



# City of Santa Monica

## 2024 - 2025 Action Plan (Proposed)

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For CDBG and HOME funds received through the  
U.S. Department of Housing and Urban Development

Public Review Draft - March 2024



# Executive Summary

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

### 1. Introduction

The 2024-25 Annual Action Plan represents the fifth and final year of the City of Santa Monica's 2020-24 Consolidated Plan, as adopted by Council on June 9, 2020 and approved by the U.S. Department of Housing and Urban Development (HUD). The Annual Action Plan is prepared in response to a consolidated process developed by HUD for the Community Development Block Grant (CDBG) and the Home Investment Partnership Act (HOME) programs.

The Consolidated Plan outlines housing, community, and economic development needs, priorities, strategies, and projects to be undertaken by the City of Santa Monica with the funds received from the U.S. Department of Housing and Urban Development (HUD). As an entitlement jurisdiction, the City receives an annual share of federal Community Development Block Grant (CDBG) and HOME funds. In order to receive its CDBG and HOME entitlement, the City must submit an Annual Action Plan to HUD prior to the start of each program year. CDBG and HOME funds are intended to provide lower and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, development activities, public services, economic development, planning, and program administration.

The Annual Action Plan serves the following functions: 1) a planning document for the City, which builds upon a citizen participation process; 2) an application for federal funds under HUD's formula grant programs; 3) a strategy for the upcoming fiscal year that describes programs and projects to be undertaken to meet established goals; and 4) a basis for assessing performance. It is important to note that the Consolidated Plan identifies priority community needs and establishes a framework for goals to be achieved during the 2020-24 five-year period. The priority needs and associated goals detailed in the Consolidated Plan serve as the basis for the programs and activities identified in this 2024-25 Annual Action Plan.

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

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Priorities identified in the 2020-24 Consolidated Plan are based on input and recommendations from City staff, local organizations, and the public participation process. The strategies described herein advance Santa Monica’s goals for assisting low and moderate income persons and neighborhoods with funds made available through the 2020-24 Consolidated Plan and Annual Action Plans. The affordable housing and development needs of a community will always outweigh the resources available to address those needs. Therefore, it is necessary to prioritize the use of available funds to the highest and best use to meet the most pressing needs for community development, economic development, housing, persons experiencing homelessness, and special needs populations. For details regarding the activities identified in this 2024-25 Annual Action Plan and their relation to the objectives listed below, please refer to sections AP-20 (Annual Goals and Objectives) and AP-35 (Projects). The City’s objectives, goals and anticipated outcomes identified in the 2020-24 Consolidated Plan are shown in the following table.

<b>2020-24 Consolidated Plan</b>		
<b>Goal Name</b>	<b>Priority Needs Addressed</b>	<b>Goal Outcome Indicator</b>
1. Expand/Improve Public Infrastructure/Facilities	Expand/Improve Public Infrastructure & Facilities	-Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
2. Provide Safe, Affordable Housing Opportunities	Preserve & Develop Affordable Housing  Fair Housing	-Public service activities for Low/Moderate Income Housing Benefit: 400 Households Assisted -Tenant-based rental assistance / Rapid Rehousing: 125 Households Assisted -Home modifications for special needs populations: 25 households Assisted
3. Provide Vital Services for LMI & Special Needs	Public Services & Quality of Life Improvements	-Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
4. Economic Development Opportunities	Economic Development Opportunities	-Public service activities other than Low/Moderate Income Housing Benefit: 900 Persons Assisted
5. Provide Assistance to Homeless Services & Shelters	Homelessness Housing & Support Services	-Homelessness Prevention: 700 Persons Assisted

**2020-24 Consolidated Plan Goals**

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Accomplishments by City Departments and numerous non-profit organizations are submitted to HUD annually via the Consolidated Annual Performance and Evaluation Report (CAPER) and the Integrated Disbursement and Information System (IDIS) following the end of each program year. The list below identifies some of the accomplishments reported on the 2022 CAPER for activities completed through the third year of the current 2020-24 Consolidated Plan.

- 638 households supported through the COVID-19 Emergency Rental Assistance Program (CDBG, CDBG-CV)
- 151 households receiving tenant-based rental assistance (TBRA) to subsidize rental expenses (HOME)
- Home accessibility modifications to 21 units for special needs populations, including the elderly, frail elderly, and persons with disabilities (CDBG)
- Legal services to 2031 low-income program participants to promote access to justice, fair housing, and strengthen communities (CDBG)
- Job training, readiness workshops, and employment to 432 participants (CDBG)
- Housing retention and supportive services to 423 formerly homeless individuals in the Continuum of Care program (CDBG)

The City recognizes that the evaluation of past performance is critical to ensuring the City and its subrecipients are implementing activities effectively and that those activities align with the City's overall strategies and goals. The City will continue to track performance of programs and the 2020-24 Consolidated Plan strategies to ensure steady progress toward established five-year goals.

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

Summary from citizen participation section of plan.

The City considers the involvement of its low- and moderate-income residents to be essential to the development and implementation of its Consolidated Plan and Annual Action Plans. To that end, residents and community stakeholders of Santa Monica played a significant role in the preparation of the 2020-24 Consolidated Plan. The City's current Citizen Participation Plan was utilized to encourage citizen input as codified in the City's municipal code. Actions taken by the City to obtain citizen participation included presentations at City Commission meetings, online/website communication, community stakeholder interviews, a widely distributed online survey, public notices, and public hearings.

Well-publicized public hearings were held at City Commission meetings in February 2020, and the original draft 2020-24 Consolidated Plan and 2020-21 Annual Action Plan were available for a thirty-day public review and comment period starting on March 16, 2020. Following the receipt of CARES Act funding, the City incorporated the use of CDBG-CV funds into the Consolidated Plan and 2020-21 Annual Action Plan. The revised plans were republished for an expedited five-day review and comment period pursuant to the flexibility provided under the CARES Act. The completed plans were approved by City Council on June 9, 2020. These sessions were part of a concerted effort to obtain as much public input as possible in the preparation of the Plans. The 2020-24 Consolidated Plan and 2020-21 Annual Action Plan were amended in October 2020 to incorporate an additional allocation of CARES Act funding (CDBG-CV3), which increased resources available for the City's COVID-19 Emergency Rental Assistance Program (ERAP).

In order to inform development of this 2024-25 Annual Action Plan, and in accordance with the City's Citizen Participation Plan as documented in Chapter 2.68 of the Santa Monica Municipal Code, an advertised public hearing to receive input on the development of the 2024-25 Annual Action Plan is scheduled for the March 21, 2024 meeting of the Recreation and Parks Commission. This 2024-25 Annual Action Plan is now made available for a well-advertised 30-day public review period beginning March 22, 2024. The City Council is scheduled to consider approval of the 2024-25 Annual Action Plan at its April 23, 2024 meeting. The public hearing and public review period were both noticed in accordance with the Citizen Participation Plan and included official notices in the Santa Monica Daily Press, email notification to local grantees, service providers, neighborhood associations, and Housing and Human Services boards, commissions, and workgroups, and a notice in the SaMoNews email blast to over 40K Santa Monica community members. Notices invited participation from Spanish speakers and offered accommodations for people with disabilities upon request. Taken together, these outreach and engagement strategies are part of a concerted effort to obtain significant public input during preparation of the plan.

Following HUD's acceptance of the plan, the 2024-25 Annual Action Plan will be made available online at <https://www.santamonica.gov/community-development-block-grant-and-home-investment-partnership-programs>. Hard copies can be requested by contacting the Housing and Human Services Department at (310) 458-8701 or [humanservices@santamonica.gov](mailto:humanservices@santamonica.gov).

The City's Citizen Participation Plan will continue to guide the preparation and/or revision of the Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance & Evaluation Reports (CAPERs) over the final remaining program year in the 2020-24 Consolidated Plan.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A final accounting of any feedback or comments received in response to outreach efforts, including the aforementioned public hearing, during the 30-day public review period, or at the April 23, 2024 Council meeting will be included in the Public Participation attachment to the final, Council-approved 2024-25 Annual Action Plan. Copies of all public hearing and public review notices to participate and all input received will be incorporated into the Annual Action Plan prior to final submission to HUD, to the extent possible.

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

All comments and input received will be accepted and documented within the final 2024-25 Annual Action Plan, to the extent possible.

**7. Summary**

Not applicable.



## 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
CDBG Administrator	SANTA MONICA	Housing and Human Services Department
HOME Administrator	SANTA MONICA	Housing and Human Services Department

Table 1 – Responsible Agencies

### Narrative (optional)

The City of Santa Monica’s Housing and Human Services Department (HHSD) served as the lead agency in coordinating development of the 2024-25 Annual Action Plan. HHSD staff is currently responsible for administration of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds and works to ensure a consistent approach to administering projects and progressing towards goals. In addition, HHSD works with public agencies, for-profit, and non-profit organizations that play a part in the provision of affordable housing and community services in Santa Monica.

The City currently uses HOME funding for Tenant Based Rental Assistance (TBRA) and continues to closely monitor available federal funding, adjusting its lease up as necessary. The City adheres to income limits established by HUD in order to determine eligibility for programs and for income targeting purposes. Income eligibility is determined by comparing the annual income of an applicant to the applicable income limits for their family size. In order to be income eligible a family must be a very low-income, low-income, or moderate-income family.

### Consolidated Plan/Action Plan Public Contact Information

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

### **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(I))**

The City of Santa Monica is one of 88 cities in Los Angeles County and is geographically surrounded by the City of Los Angeles. Santa Monica has maintained a robust investment of local resources in human services, including services for people who are homeless. The City continues to be impacted by the overall rise in need for social services in the region, and encourages surrounding communities to take on their “fair share” of the cost and resource burden of providing services for people who are homeless.

The City coordinates resources and services through the Human Services Division (HSD), which includes a Homeless Prevention and Intervention Team of 5 FTE. The City’s approach is aligned with Continuum of Care (CoC) priorities and best practices. HSD also supports a community-wide safety net that provides services to seniors, people with disabilities, youth, families, and low-income households to promote housing stability, economic opportunities, education, and health.

The City continues to develop progressive and compassionate solutions that foster access to appropriate housing and services in every community, drawing on regional resources. Beginning in 2015, the City has participated in the development and implementation of Los Angeles County’s Homeless Initiative, which has a spending plan of \$783 million for fiscal year 2024-2025 to address homelessness regionwide. Santa Monica is an active participant in the Westside Cities Council of Governments (WSCCOG) and receives Homelessness Initiative funding via the WSCOG’s Local Solutions Fund for homelessness prevention and intervention efforts. The City is also a member of the Westside Coalition which is an alliance of 75 organizations, public agencies and faith communities committed to working collaboratively on issues of housing, hunger, and health through service coordination and education.

The City has the opportunity to expand services addressing homelessness using two new funding streams, Measure CS and Measure GS, approved by Santa Monica voters in November 2022. The new on-going revenue streams that will be generated through Measures CS and GS will provide funding to develop a comprehensive homelessness strategic plan and accelerate the City’s work on addressing homelessness, producing and preserving affordable housing, and maintaining clean and safe public spaces. A number of activities funded under Measure CS are underway, including preparation of a comprehensive Homelessness Strategic Plan (HSP), expansion of the City’s homeless multi-disciplinary teams, redesign of the SAMOSHEL interim housing program to accommodate 24/7 intakes, and efforts to expand the Police Department’s Homeless Liaison Program (HLP). Such a significant level of investment presents a ground-breaking opportunity for the City to embark on implementing the



recommendations laid out in the City's 2023 Homelessness Report. Planning and organizational adjustments may begin as early as FY 2024-25 for what will likely be a multi-year Measure GS implementation strategy.

The City is committed to continuing to work with regionwide partners to develop progressive and compassionate solutions that foster access to appropriate housing and services in every community.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City coordinates with the Continuum of Care (CoC) by actively participating in the Los Angeles County Homeless Initiative which is driven by the County Executive Office and the Los Angeles Homeless Services Authority (LAHSA) as the CoC lead agency. Santa Monica is focusing especially on County strategies that create a coordinated system, subsidize housing, and increase the supply of affordable housing. This plan has been effective in bringing regional partners together to form collaborative efforts and improving coordination between public (housing authorities, County Depts. of Mental Health, Public Health, Health Services and Public Social Services) and private (foundations, corporations, housing developers, nonprofit organizations, and faith-based communities) housing and services. The City has participated in the development and implementation of the Continuum of Care Coordinated Entry System (CES), in accordance with HUD requirements. CES seeks to standardize the assessment process to ensure people who are homeless are matched to the most appropriate housing options, while enhancing coordination of housing and services through intensive collaboration. CES brings together local resources with county departments, housing authorities, mainstream benefits, the Veterans Administration (VA), and private sector partners. Staff from the City's Housing and Human Services Department also participates in CoC planning meetings, quarterly CoC meetings and LAHSA Commission meetings to provide comment on critical CoC issues such as performance measures, evaluation tools, and NOFA prioritization.

**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**

While the City of Santa Monica does not administer ESG funds, the City is part of the Los Angeles Continuum of Care (CoC) led by the Los Angeles Homeless Services Authority (LAHSA). LAHSA establishes priorities for the CoC, including performance standards, evaluation, and Coordinated Entry System procedures. The City participates in quarterly CoC meetings to discuss funding priorities, evaluation tools and performance measures. All CoC funded programs are required to submit Annual Performance Reports (APR) to the CoC lead agency LAHSA. The City manages an independent Homeless Management Information System (HMIS) that was initially funded through HUD CoC and is currently supported with

local general funds. The City s meets weekly with its current HMIS vendor, LAHSA’s current HMIS vendor, and LAHSA with the goal of fully transitioning to LAHSA’s HMIS during FY 2024-25, which will improve care and case coordination. Local consent forms and policies are consistent with CoC standards. City-funded programs share this common computerized database to track unduplicated participants and their outcomes, as well as to coordinate case management within the system. Santa Monica was one of the first communities nationally to build the Vulnerability Index assessment into an existing HMIS, which allowed for the full integration of the Service Registry into HMIS to improve case coordination and outcome reporting.

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

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

1	<b>Agency/Group/Organization</b>	Housing Commission
	<b>Agency/Group/Organization Type</b>	Other government - Local City Commission
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Commission Meetings
2	<b>Agency/Group/Organization</b>	Human Services Commission
	<b>Agency/Group/Organization Type</b>	Other government - Local City Commission
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Community Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Commission Meetings
3	<b>Agency/Group/Organization</b>	Disabilities Commission
	<b>Agency/Group/Organization Type</b>	Other government - Local City Commission
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Services for Persons with Disabilities
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Commission Meetings

4	<b>Agency/Group/Organization</b>	Early Childhood Task Force
	<b>Agency/Group/Organization Type</b>	Advisory Group
	<b>What section of the Plan was addressed by Consultation?</b>	Community Service Needs for Youth and Families
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Advisory Group Meeting and Discussion
5	<b>Agency/Group/Organization</b>	Virginia Avenue Park Advisory Board
	<b>Agency/Group/Organization Type</b>	Other government - Local Advisory Group
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Community Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Advisory Board Meeting and Discussion
6	<b>Agency/Group/Organization</b>	Cradle to Career Workgroup
	<b>Agency/Group/Organization Type</b>	Advisory Group
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Community Services for Youth and Families
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Workgroup Meeting and Discussion
7	<b>Agency/Group/Organization</b>	Senior & Disability Housing Task Force
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Workgroup Meeting and Discussion
8	<b>Agency/Group/Organization</b>	St. Joseph Center
	<b>Agency/Group/Organization Type</b>	Services-homeless Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
9	<b>Agency/Group/Organization</b>	Meals on Wheels West
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
10	<b>Agency/Group/Organization</b>	Hospitality Training Academy
	<b>Agency/Group/Organization Type</b>	Services-Employment Non-Profit

	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Job-Training
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
11	<b>Agency/Group/Organization</b>	Venice Family Clinic
	<b>Agency/Group/Organization Type</b>	Services-Health Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Non-Homeless Special Needs Family Health Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
12	<b>Agency/Group/Organization</b>	Chrysalis
	<b>Agency/Group/Organization Type</b>	Services-Employment Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Job Training
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
13	<b>Agency/Group/Organization</b>	Upward Bound House
	<b>Agency/Group/Organization Type</b>	Services-homeless Non-Profit

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Service Provider participates in public meetings as-needed.
14	<b>Agency/Group/Organization</b>	WISE & Healthy Aging
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Services for Seniors
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
15	<b>Agency/Group/Organization</b>	JVS SoCal
	<b>Agency/Group/Organization Type</b>	Services-Employment Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
16	<b>Agency/Group/Organization</b>	Westside Food Bank
	<b>Agency/Group/Organization Type</b>	Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Food Insecurity



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
17	<b>Agency/Group/Organization</b>	CLARE   MATRIX
	<b>Agency/Group/Organization Type</b>	Services-Health Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Youth and Families
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
18	<b>Agency/Group/Organization</b>	Providence Saint Johns
	<b>Agency/Group/Organization Type</b>	Services-Children Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Youth and Families
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
19	<b>Agency/Group/Organization</b>	Legal Aid Foundation of Los Angeles
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Fair Housing

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
20	<b>Agency/Group/Organization</b>	Santa Monica College
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Education
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
21	<b>Agency/Group/Organization</b>	Santa Monica Boys and Girls Club
	<b>Agency/Group/Organization Type</b>	Services-Children Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Youth and Families
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
22	<b>Agency/Group/Organization</b>	The People Concern
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
23	<b>Agency/Group/Organization</b>	Step Up on Second, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
24	<b>Agency/Group/Organization</b>	Connections for Children
	<b>Agency/Group/Organization Type</b>	Services-Children Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Youth and Families, Childcare
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
25	<b>Agency/Group/Organization</b>	Family Service of Santa Monica/Vista Del Mar
	<b>Agency/Group/Organization Type</b>	Services-Children Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Youth and Families, Mental Health

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
26	<b>Agency/Group/Organization</b>	Growing Place
	<b>Agency/Group/Organization Type</b>	Services-Children Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Youth and Families, Childcare
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
27	<b>Agency/Group/Organization</b>	Disability Community Resource Center
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
28	<b>Agency/Group/Organization</b>	Haven Neighborhood Services
	<b>Agency/Group/Organization Type</b>	Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Youth and Families, Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.

29	<b>Agency/Group/Organization</b>	Social & Emotional Wellness Initiative
	<b>Agency/Group/Organization Type</b>	Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Youth and Families, Mental Health
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City-funded agency coordinates service provision with City; Participates in public meetings as-needed.
30	<b>Agency/Group/Organization</b>	Community Corporation of Santa Monica
	<b>Agency/Group/Organization Type</b>	Housing Non-Profit
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Low income housing provider; Participates in public meetings as-needed.

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

The City of Santa Monica continues to consult with a wide variety of agencies and organizations involved in activities that are relevant to CDBG and HOME activities and programs. The City also takes steps to ensure widespread awareness of the development of the Annual Action Plan and is intentional about creating opportunities for meaningful feedback from a diverse group of service providers, stakeholders, and community members.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Los Angeles Homeless Services Authority	Homelessness Strategy
Land Use and Circulation Element	City	City Vision and Goals
Housing Element	City	City Guidelines and Plans for Housing
Action Plan to Address Homelessness	City	Homelessness Strategy
SMHA Public Housing Five-Year Plan	Housing Authority	Coordination of Efforts
Analysis of Impediments to Fair Housing Choice	Housing Authority	Fair Housing Objectives & Plan
Assessment of Fair Housing	Housing Authority	Fair Housing Objectives & Plan
Human Services Grant Program Funding Guidelines	City	Coordination of Efforts
Youth Wellbeing Report Card	City	Programs for Youth and Teens
Youth Violence Prevention in SM: An Action Plan	City	Programs for Youth and Teens
2018 Resident Satisfaction Survey	City	City Vision and Goals
City Council Priorities	City	City Vision and Goals
Homelessness Resource Coordination Meetings	City	Homelessness Strategy
Westside Cities Council of Governments (WSCCOG) meetings	Council of Governments (COG)	Coordination of Efforts
Analysis and Recommendations of Local Tenant Protection	City	Tenant Protection Recommendations
Behavioral Health Feasibility Study	City	City Vision and Goals
Aging & Disability Strategic Planning	City	City Vision and Goals
Homelessness Strategic Plan	City	Homelessness Strategy

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

## **Narrative (optional)**

The City of Santa Monica has established a number of commissions and advisory boards comprised of interested citizens to monitor the needs of the community and advise the City Council on the best way to address these needs, including the Disabilities Commission, Housing Commission, Human Services Commission, and the Virginia Avenue Park Advisory Board. The City also partners with several local non-profit organizations to ensure the adequate provision of housing and community services in Santa Monica. The organizations are invited to Commission meetings and to Public Hearings, and Council meetings, where their ideas, expressions of need, and information on program activities are sought. More information on the City's non-profit partners for the Human Services Grants Program can be viewed at [santamonica.gov/human-services-grants-program](https://santamonica.gov/human-services-grants-program).

The City also works closely with a network of other private and public entities that constitute a comprehensive network of resources. These include key public and quasi-public agencies, coalitions and groups, such as the California Department of Housing and Community Development, California Employment Development Department, California Department of Aging, Federal Emergency Management Agency, Los Angeles County Department of Child and Family Services, Los Angeles County Department of Public Health, Los Angeles County Department of Health Services, Los Angeles County Department of Mental Health, Los Angeles County Department of Public Social Services, Los Angeles Homeless Services Authority, Los Angeles County Housing Authority, Los Angeles County Metropolitan Transportation Authority, Los Angeles County Development Authority, Santa Monica-Malibu Unified School District, United Way, and Westside Cities Council of Governments.

Funding for affordable housing is provided to nonprofit affordable housing organizations pursuant to the City's Housing Trust Fund Guidelines and rental housing vouchers are provided pursuant to the Santa Monica Housing Authority's 5-Year Administrative and Annual Plans. Social service delivery by non-profit agencies is coordinated through the City's Human Services Grants Program which is approved annually by the City Council during the budget adoption process. The City Council approves projects and programs that meet the City's goals. In addition, the Westside Coalition has representatives from agencies involved with emergency shelter, affordable housing, and supportive services on the Westside of Los Angeles County. The Coalition meets monthly to coordinate efforts, including advocacy in the county, state, and federal government.

In recognition of the importance of behavioral health and wellness as relevant to both Consolidated Plan goals and other City efforts, the City is currently developing a Behavioral Health Strategy with the goal of developing a holistic plan that proposes both short-term and long-term approaches to the myriad of issues facing our community in relation to mental health and substance abuse issues.



In 2024, the City will be embarking on a strategic planning process to meet the needs of older adults and people with disabilities in Santa Monica, including housing and services related needs. In 2023, the City contracted with consultant Berry Dunn to develop a comprehensive homelessness strategic plan that will set clear policy direction, promote alignment across city stakeholders, and support regional 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**

The City considers the involvement of its low- and moderate-income residents to be essential to the development and implementation of its Five-Year Consolidated Plan and Annual Action Plans. The residents of Santa Monica played a significant role in the preparation of the Consolidated Plan. While developing the 2020-24 Consolidated Plan, the City's Citizen Participation Plan was utilized to encourage citizen input as the City launched a collaborative effort to consult with elected officials, commissioners, City departments, community stakeholders, and beneficiaries of entitlement programs to inform and develop the priorities and strategies contained within the five-year plan. Actions taken by the City to obtain citizen participation included: presentations at City meetings, online/website communication, stakeholder interviews, a widely-distributed online survey, public notices, and public hearings. The City's outreach and consultation strategies included the formation of community outreach partnerships with housing, service, and mental health providers; workforce developers; community advocates; and others. The City's Citizen Participation Plan will continue to guide the preparation (and/or revision) of the Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports (CAPERs) throughout the lone remaining program year in the 2020-24 Consolidated Plan.

In order to inform development of this 2024-25 Annual Action Plan, and in accordance with the City's Citizen Participation Plan as documented in Chapter 2.68 of the Santa Monica Municipal Code, is advertising a public hearing to receive input on the development of the 2024-25 Annual Action Plan at the March 21, 2024 meeting of the Recreation and Parks Commission. The 2024-25 Annual Action Plan is subsequently made available for a well-advertised 30-day public review period beginning March 22, 2024. The City Council is scheduled to consider formal approval of the 2024-25 Annual Action Plan at its April 23, 2024 meeting. The public review period and public hearings are noticed in accordance with the Citizen Participation Plan and include official notices in the Santa Monica Daily Press, email notification to local grantees, service providers, neighborhood associations, and Housing and Human Services boards, commissions, and workgroups, and a notice in the SaMoNews email blast to over 40K Santa Monica community members. Notices invite participation from Spanish speakers and offered accommodations for people with disabilities upon request. Taken together, these outreach and engagement strategies are part of a concerted effort to obtain significant public input during preparation of the plan.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-English Speaking - Specify other language: Spanish  Persons with disabilities  Non-targeted/broad community	To be held at the March 21, 2024 meeting of the Recreation and Parks Commission	Any comments / feedback received will be summarized here.	All appropriate questions/comments will be accepted.	<a href="http://www.smgov.net/rpc">www.smgov.net/rpc</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Internet Outreach	Minorities  Non-English Speaking - Specify other language: Spanish  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing  Vulnerable Individuals and Households	Information regarding the March 21, 2024 Public Hearing, the 30-Day Public Review period, and the April 23, 2024 Council Meeting was posted on the City's CDBG/HOME webpage, with directions on how to participate and/or submit public comment.	Any comments / feedback received will be summarized here.	All appropriate questions/comments will be accepted.	<a href="http://www.santamonica.gov/community-development-block-grant-and-home-investment-partnership-programs">www.santamonica.gov/community-development-block-grant-and-home-investment-partnership-programs</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p> <p>Vulnerable Individuals and Households</p>	<p>Newspaper advertisements for the March 21, 2024 Public Hearing, the 30-Day Public Review period, and the April 23, 2024 Council Meeting were posted in the Santa Monica Daily Press, with directions on how to participate and/or submit public comment.</p>	<p>Any comments / feedback received will be summarized here.</p>	<p>All appropriate questions/comments will be accepted.</p>	<p><a href="http://www.smdp.com">www.smdp.com</a></p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Mass Emailing	City Commissions Service Providers Community Groups	Email notice of the March 21, 2024 Public Hearing, the 30-Day Public Review period, and the April 23, 2024 Council Meeting was distributed to local grantees and services providers, Santa Monica Neighborhood Associations, and boards, commissions, advisory bodies, and workgroups supported by the Housing and Human Services Department;	Any comments / feedback received will be summarized here.	All appropriate questions/comments will be accepted.	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	SaMoNews Email Newsletter	Non-targeted/broad community	The March 27, 2024 SaMoNews email newsletter included notice of the 30-Day Public Review period. The newsletter is distributed to a list of over 40K subscribers.	Any comments / feedback received will be summarized here.	All appropriate questions/comments will be accepted.	N/A
7	Public Meeting	Non-targeted/broad community	City Council is scheduled to consider formal approval of the 2024-25 Annual Action Plan on April 23, 2024.	Any comments / feedback received will be summarized here.	All appropriate questions/comments will be accepted.	<a href="http://www.santamonica.gov/topic-explainers/city-council">www.santamonica.gov/topic-explainers/city-council</a>

**Table 4 – Citizen Participation Outreach**



## Expected Resources

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

#### Introduction

Santa Monica, like many jurisdictions, is faced with the challenging task of meeting increasing needs with fluctuating federal and state resources. As this FY 2024-25 Annual Action Plan is being developed prior to passage of FY2024 HUD appropriations and the subsequent release of 2024 CDBG/HOME allocations, the figures shown in the table below reflect estimated CDBG and HOME allocations for FY 2024-25. Estimates assume that FY 2024-25 CDBG/HOME funding will remain level with FY 2023-24 funding.

As the City is entering the fifth and final year of the 2020-24 Consolidated Plan, there is no amount reported in the “Expected Amount Available Remainder of ConPlan” section. If there are substantial funding cuts or increases to CDBG or HOME over the coming years, the City will adjust accordingly to include contingency plans reflective of funding realities. The following contingencies apply to 2024-25 activities proposed for funding:

- This FY 2024-25 Annual Action Plan is being developed prior to passage of FY2024 HUD appropriations and the subsequent release of 2024 CDBG/HOME allocations. Should actual allocations differ from estimates, funding adjustments will be allocated to activities as follows:
  - CDBG funding adjustments will be allocated first to Administration and Public Services to ensure those activities remain resourced in alignment with allowable thresholds of 20% and 15%, respectively. Thereafter, any CDBG funding adjustment will be allocated proportionally to the proposed Public Infrastructure projects.
  - HOME funding adjustments will be allocated first to Administration up to ensure alignment with the allowable threshold of 10%, and then to the CHDO Reserve to ensure the required 15% set-aside. Thereafter, any HOME funding adjustments would be allocated to Tenant-Based Rental Assistance (TBRA).
  - HUD has intermittently waived the requirement that entitlement jurisdictions set aside 15% of their annual HOME allocation for Community Housing Development Organization (CHDO) activities. Should the waiver be announced for the FY 2024-25 program year, these funds would be used to increase funding for Tenant-Based Rental Assistance (TBRA) and/or HOME Administration.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,144,558	50,000	282,152	1,478,710	0	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	634,974	40,000	0	674,974	0	

**Table 5 - 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**

City administration recognizes that the City's annual entitlement and formula allocations are not sufficient to meet all of its needs, and that leveraging resources is critical to achieving the City's goals. The City continues to cultivate funding partners who can match the City's investment of CDBG and HOME funds. Even with nearly \$10+ million in funding for the City's Human Services Grants Program and local funding committed

to the production and preservation of affordable housing, the need remains great, and additional funds are sought to ensure that more affordable housing and important programs and activities are available for those in need. To that end, the City seeks funds from the State and grants from other entities, both public and private.

Matching requirements have been satisfied with other eligible financial resources and/or in-kind services, and the City will continue to seek this type of matching as well as financial matches.

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

The City owns two properties that are leased to a local non-profit at below-market rates for the operations of homeless services at the Access Center and the SAMOSHEL emergency shelter. Funds from Measure CS, passed in November 2022, will be used to support redesign of SAMOSHEL. Once the SAMOSHEL redesign is complete in March 2024, first responders will be able to refer clients to emergency shelter beds 24/7. In 2022, the City executed a long-term lease for Ken Edwards Center, a City-owned facility, to a non-profit providing services to seniors, including those who are disabled, at-risk of homelessness, or low-income.

Prior to the adoption of the October 2022 Housing Element discussed in more detail below, the City reviewed various City-owned properties and evaluated the sites for potential affordable housing development. The sites represented a range of development potential involving near-term and long-term opportunities, as well as housing production ‘yield’. One particular site was ready for redevelopment, and in January 2022, the City Council selected a developer for the property at 1318 4th Street to be developed as 100% affordable housing, including a requirement that 50 apartments of the future affordable housing be targeted to persons experiencing homelessness. During 2022 and 2023, the developer has been meeting with stakeholders and members of the community to receive input about the potential design of the affordable housing and associated services for the supportive housing component.

On October 11, 2022, the City Council adopted the 2021-2029 Housing Element, a State-mandated plan to demonstrate the City’s capacity to accommodate its share of regional housing need at all income levels. In the Housing Element, the City demonstrated capacity for 1,880 homes affordable to lower income households on specific City-owned sites. The sites will be developed with 100% affordable housing through issuance of requests for proposals (RFPs) during the Housing Element planning period. The City issued an RFP on June 22, 2023, for development of affordable housing on three City-owned public surface parking lots located at 1217 Euclid Street, 1211-17 14th Street, and 1146 16th Street. The sites are collectively projected to accommodate 130 homes. The City Council is anticipated to select a development team for the three sites on March 19, 2024. As part of Housing Element implementation, the City will issue its next RFP for affordable housing on a City-owned site no later than June 30, 2025.

**Discussion**

N/A

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1. Expand/Improve Public Infrastructure/Facilities	2020	2024	Non-Housing Community Development	Low/Mod Areas	Expand/Improve Public Infrastructure & Facilities	CDBG: \$1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7790 Persons Assisted
2	2. Provide Safe, Affordable Housing Opportunities	2020	2024	Affordable Housing Non-Homeless Special Needs	Low/Mod Areas	Preserve & Develop Affordable Housing	HOME: \$512,231	Tenant-based rental assistance / Rapid Rehousing: 25 Households Assisted
3	4. Economic Development Opportunities	2020	2024	Non-Housing Community Development	Low/Mod Areas	Economic Development Opportunities	CDBG: \$50,000	Businesses assisted: 5 Businesses Assisted
4	5. Provide Assistance Homeless Services & Shelters	2020	2024	Homeless	Low/Mod Areas	Homelessness Housing & Support Services	CDBG: \$189,800	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	1. Expand/Improve Public Infrastructure/Facilities
	<b>Goal Description</b>	<p><u>CDBG: 19th Street Parcel Development - Phase II:</u></p> <p>The vacant 2018 19th Street land parcel was originally purchased using CDBG and General Funds in FY 2019-20 in order to develop the land into a beneficial community resource. Following continued engagement of Pico Neighborhood residents within the service area, the City awarded FY 2023-24 CDBG funds for Phase I development, which includes grading and preparing the land for general accessibility. Phase II development will include the necessary infrastructure to support a community garden, including raised garden beds, seating, and lighting. With the completion of Phase II, the parcel will be transformed into a valuable amenity serving the Pico Neighborhood community while also adding an additional garden to the City's Community Garden program</p> <p><u>CDBG: Virginia Avenue Park Playground Replacement - Phase I:</u></p> <p>The Virginia Avenue Park (VAP) Playground is in need of a renovation, specifically focused on equipment replacement, reducing sand, and providing shade. VAP is home to the only City playground in the Pico Neighborhood, and one which is heavily used by families, camps, and farmers market visitors. At present, the playground equipment is aging and in need of replacement, the sand surface prevents accessible use of the playground, and community members regularly request shade to be added to this site to provide relief from direct sunlight. The VAP Playground Replacement project will use a phased, multi-year approach to update playground equipment and to install a more accessible surface and shade covering in order to create a safe, enjoyable playground experience for the community.</p>
2	<b>Goal Name</b>	2. Provide Safe, Affordable Housing Opportunities
	<b>Goal Description</b>	Increase affordable rental housing opportunities for LMI households through the provision of Tenant-Based Rental Assistance.
3	<b>Goal Name</b>	4. Economic Development Opportunities
	<b>Goal Description</b>	Fund the City's Small Business Assistance and Tenant Improvement Program to continue cultivating an equitable economic recovery for eligible Santa Monica small businesses

4	<b>Goal Name</b>	5. Provide Assistance Homeless Services & Shelters
	<b>Goal Description</b>	Fund a multidisciplinary outreach team for people experiencing homelessness, including a substance use disorder hub and spoke system that increases the City's capacity to effectively address substance use and overdose among Santa Monica's homeless and temporarily housed populations

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The development of the Annual Action Plan is informed by meetings and discussions between the staff from the City's Housing and Human Services Department and other City Departments and Divisions, as well as consultation with housing and social service agencies involved in delivering services for vulnerable populations in Santa Monica. Public input is solicited through an advertised 30-day public review period, a public hearing scheduled for the March 21, 2024 meeting of the City's Recreation and Parks Commission, and as an item to be heard as part of the City Council's April 23, 2024 agenda. All projects selected to receive funding meet objectives and goals established in the 2020-24 Consolidated Plan to address priority needs.

### Projects

#	Project Name
1	CDBG: 19th Street Parcel Development - Phase II
2	CDBG: Virginia Avenue Park Playground Replacement - Phase I
4	CDBG: Small Business Assistance and Tenant Improvement Program
5	CDBG: Public Services
6	CDBG: Administration
7	HOME: Tenant-Based Rental Assistance
8	HOME: Administration
9	HOME: CHDO Reserve

Table 7 - Project Information

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

Proposed 2024-25 capital projects were identified from a pool of unfunded projects that aligned with 2020-24 Consolidated Plan priorities while meeting the greatest current needs.

As described above, Consolidated Plan needs and priorities were identified through input received from community leaders, citizen participation, Commission meetings, and public hearings, with the objective of using limited resources to have the greatest impact in meeting the most pressing needs. These inputs were described in the public participation section of the 2020-24 Consolidated Plan. The City also remains in regular communication with agency officials and partners in county, state, and regional organizations. In addition, the City's Housing and Human Services, Community Development, and Public Works Departments continue to explore creative ways to efficiently utilize existing resources to assist



those in need.

The impacts of the COVID-19 pandemic continue to result in a significant increase in social service and housing needs in Santa Monica, while the decrease in City revenues resulting from the economic impacts of the pandemic have reduced the City's ability to adequately address these emergent needs. Concurrently, the consistent rise in market rents continues to exacerbate the difficulty of finding affordable housing in Santa Monica. Due to its heavy reliance on the tourism, hospitality and retail sectors, Santa Monica's economy was particularly hard hit by the pandemic, with revenues from transient occupancy and sales taxes and parking related revenues, which accounted for nearly one-half of General Fund revenues prior to the pandemic, falling 39% in FY 2020-21 from pre-COVID levels, while total General Fund revenues were down 22% over the same period. While General Fund revenues are now growing, it is anticipated that they will not recover to the level projected prior to the pandemic until FY 2026-27. While the City has already experienced a loss of nearly \$170 million since 2020, revenues will lag behind pre-pandemic projected growth by nearly \$34 million more over the next five years, for a total revenue loss of approximately \$204 million over 7 years.

Adding to the fiscal challenge is the current condition of the General Fund reserves. Strong reserves are necessary to cushion the delivery of services from the impact of emergency expenditures, contingent liabilities, and economic uncertainty. Since 2020, the City has had to program General Fund reserves to deliver essential services during the COVID-19 pandemic, to address several significant legal settlement payments, and to fill future budget deficits. Looking ahead, the City is facing some extraordinary, one-time contingent liabilities that further threaten reserve levels. As revenues return, the City will make every effort to allocate funding to address unmet needs in alignment with Council priorities and will continue to identify opportunities for partnership and alternative funding sources to complement the City's limited resources.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG: 19th Street Parcel Development - Phase II
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	1. Expand/Improve Public Infrastructure/Facilities
	<b>Needs Addressed</b>	Expand/Improve Public Infrastructure & Facilities
	<b>Funding</b>	CDBG: \$ 500,000 (Estimated)
	<b>Description</b>	The vacant 2018 19th Street land parcel was originally purchased using CDBG and General Funds in FY 2019-20 in order to develop the land into a beneficial community resource. Following continued engagement of Pico Neighborhood residents within the service area, the City awarded FY 2023-24 CDBG funds for Phase I development, which includes grading and preparing the land for general accessibility. Phase II development will include the necessary infrastructure to support a community garden, including raised garden beds, seating, and lighting. With the completion of Phase II, the parcel will be transformed into a valuable amenity serving the Pico Neighborhood community while also adding an additional garden to the City's Community Garden program
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4015 individuals reside in the anticipated service area, including 2210 low-moderate income individuals (55.04%); Note that this project will be associated with prior IDIS Activity 500 for the original purchase of the parcel, so no further accomplishments will be reported.
	<b>Location Description</b>	2018 19th Street Land Parcel
	<b>Planned Activities</b>	Development of infrastructure to support a community garden, including raised garden beds, seating, and lighting.
<b>2</b>	<b>Project Name</b>	CDBG: Virginia Avenue Park Playground Replacement - Phase I
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	1. Expand/Improve Public Infrastructure/Facilities
	<b>Needs Addressed</b>	Expand/Improve Public Infrastructure & Facilities
	<b>Funding</b>	CDBG: \$500,000 (Estimated)

	<b>Description</b>	The Virginia Avenue Park (VAP) Playground is in need of a renovation, specifically focused on equipment replacement, reducing sand, and providing shade. VAP is home to the only City playground in the Pico Neighborhood, and one which is heavily used by families, camps, and farmers market visitors. At present, the playground equipment is aging and in need of replacement, the sand surface prevents accessible use of the playground, and community members regularly request shade to be added to this site to provide relief from direct sunlight. The VAP Playground Replacement project will use a phased, multi-year approach to update playground equipment and to install a more accessible surface and shade covering in order to create a safe, enjoyable playground experience for the community.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	7790 individuals reside in the anticipated service area, including 4380 low-moderate income individuals (56.23%);
	<b>Location Description</b>	Virginia Avenue Park (VAP) Playground
	<b>Planned Activities</b>	Remove and replace playgrounds; prepare and finish for full use.
<b>3</b>	<b>Project Name</b>	CDBG: Small Business Assistance and Tenant Improvement Program
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	4. Economic Development Opportunities
	<b>Needs Addressed</b>	Economic Development Opportunities
	<b>Funding</b>	CDBG: \$50,000 (Estimated)
	<b>Description</b>	Fund the City's Small Business Assistance and Tenant Improvement Program to continue supporting an equitable economic recovery for eligible Santa Monica small businesses
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 Businesses Assisted
	<b>Location Description</b>	Eligible small businesses citywide
	<b>Planned Activities</b>	Fund the City's Small Business Assistance and Tenant Improvement Program to continue supporting an equitable economic recovery for eligible Santa Monica small businesses

4	<b>Project Name</b>	CDBG: Public Services
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	5. Provide Assistance Homeless Services & Shelters
	<b>Needs Addressed</b>	Homelessness Housing & Support Services
	<b>Funding</b>	CDBG: \$189,800 (Estimated)
	<b>Description</b>	Fund a multidisciplinary outreach team for people experiencing homelessness, including a substance use disorder hub and spoke system that increases the City's capacity to effectively address substance use and overdose among Santa Monica's homeless and temporarily housed populations
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 Persons Assisted
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Fund a multidisciplinary outreach team for people experiencing homelessness, including a substance use disorder hub and spoke system that increases the City's capacity to effectively address substance use and overdose among Santa Monica's homeless and temporarily housed populations
5	<b>Project Name</b>	CDBG: Administration
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	1. Expand/Improve Public Infrastructure/Facilities 2. Provide Safe, Affordable Housing Opportunities 4. Economic Development Opportunities 5. Provide Assistance Homeless Services & Shelters
	<b>Needs Addressed</b>	Expand/Improve Public Infrastructure & Facilities Preserve & Develop Affordable Housing Public Services & Quality of Life Improvements Economic Development Opportunities Homelessness Housing & Support Services Fair Housing
	<b>Funding</b>	CDBG: \$238,910 (Estimated)

	<b>Description</b>	Administer the CDBG program in compliance with federal regulations for the 2024 Program Year
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Administer the CDBG program in compliance with federal regulations for the 2024 Program Year
6	<b>Project Name</b>	HOME: Tenant-Based Rental Assistance
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	2. Provide Safe, Affordable Housing Opportunities
	<b>Needs Addressed</b>	Preserve & Develop Affordable Housing
	<b>Funding</b>	HOME: \$512,231 (Estimated)
	<b>Description</b>	Provide tenant based rental assistance for low-moderate income households
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Tenant-based Rental Assistance: 25 Households Assisted
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Provide tenant based rental assistance for low-moderate income households
7	<b>Project Name</b>	HOME: Administration
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	2. Provide Safe, Affordable Housing Opportunities
	<b>Needs Addressed</b>	Preserve & Develop Affordable Housing
	<b>Funding</b>	HOME: \$67,497 (Estimated)
	<b>Description</b>	Administer the HOME program in compliance with federal regulations for the 2024 Program Year
	<b>Target Date</b>	6/30/2025

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Administer the HOME program in compliance with federal regulations for the 2024 Program Year
8	<b>Project Name</b>	HOME: CHDO Reserve
	<b>Target Area</b>	Low/Mod Areas
	<b>Goals Supported</b>	2. Provide Safe, Affordable Housing Opportunities
	<b>Needs Addressed</b>	Preserve & Develop Affordable Housing
	<b>Funding</b>	HOME: \$95,246 (Estimated)
	<b>Description</b>	Per regulation 92.300 the City is reserving 15% of the HOME allocation for a Community Housing Development Organization (CHDO).
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Per regulation 92.300 the City is reserving 15% of the HOME allocation for a Community Housing Development Organization (CHDO).

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

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

The latest HUD data indicate that there are 19 low/mod Block Groups in Santa Monica, distributed among 10 City’s Census Tracts. A map in the appendix to this Plan shows the location of these Block Groups

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Low/Mod Areas	95

**Table 8 - Geographic Distribution**

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

Many of the City's low/mod block groups are predominantly residential, occurring in clusters and/or adjacent to one another. The most prominent grouping occurs in a stretch of low/mod block groups south of the 10 freeway and north of Pico Boulevard. Areas such as these have been areas of concern in the past and emerged in the course of continued examination of available data. These areas are consistently cited in discussions regarding resource allocation and the City remains committed to identifying and funding eligible projects that meet their established needs.

### **Discussion**

The resources available under the 2024-25 Annual Action Plan are limited. The City targets funding according to priority needs throughout the City, with an emphasis on helping the lowest-income households, block groups, and service areas. Depending on the type of need being addressed, resources may or may not be geographically targeted. For example, public services for 2024-25 are not geographically targeted and are instead provided to eligible program participants in such a manner as to provide the greatest level of availability to the widest area possible. On the other hand, assistance to projects that improve public facilities/infrastructure will be undertaken in specific locations within eligible low/mod income areas. A project may only be funded outside of this area if the project primarily benefits low-income households or persons presumed to be low-income, such as adults with disabilities. At least 95% of the funds are allocated to projects that meet the low-income limited clientele, low-mod housing, or low-mod area national objectives.



# Affordable Housing

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

### Introduction

The most notable impediment to affordable housing revolves around the lack of Federal and State resources for affordable housing initiatives commensurate with the scale of the need, including the development of additional affordable rental housing stock and the lack of funding for new construction and rehabilitation. Insufficient funding for programs and resources to reduce excessive rent or mortgage burdens to qualified persons is also a key factor.

Another barrier to affordable housing in Santa Monica is the high cost of housing created by a demand for housing, both existing and new, which exceeds the current supply. Santa Monica is perceived as a desirable place to live, and has experienced growth in terms of both businesses that wish to operate here and in terms of people who wish to reside here. Housing prices, both purchase and rental, remain high, especially for lower income households. In addition, the cost of site acquisition is very high, as are development costs. These factors make housing construction expensive and put affordable housing out of the reach of low-income households.

The Housing Needs Assessment also identified stringent criteria in the mortgage origination process due to the previous foreclosure crisis, which also is outside the scope and control of City policy. In some instances, issues revolving around personal finances (lack of down payment, credit history, employment history) affect the availability of affordable housing for Santa Monica residents.

One Year Goals for the Number of Households to be Supported	
Homeless	50
Non-Homeless	0
Special-Needs	0
Total	50

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	25
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	25

**Table 10 - One Year Goals for Affordable Housing by Support Type**

**Discussion**

N/A

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

### **Introduction**

The Santa Monica Housing Authority (SMHA) was consulted during development of the 2020-24 Consolidated Plan development process. Although the SMHA does not own or operate any public housing, the SMHA does administer several rental housing voucher programs, and it is the intention of the Authority to continue to ensure that its participants in the Housing Choice Voucher, Continuum of Care voucher, Emergency Housing voucher, HOME voucher, Veterans Affairs Supportive Housing voucher, and Stability Voucher programs are housed in safe and adequate affordable housing.

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

The City of Santa Monica and the Santa Monica Housing Authority do not own or operate any public housing.

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

Not applicable

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

Not applicable

### **Discussion**

N/A

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

### **Introduction**

The needs of homeless persons and of persons with special needs are complex and require a wide range of specialized services. Numerous agencies, including City-funded agencies, are involved in the care of people experiencing homelessness, providing distinct services such as housing, mental health counseling, employment training, and case management services. A number of activities and services are funded to help the needs of the homeless and other special needs populations. Overall, these services address the high priority of reducing homelessness and the threat of becoming homeless, as well as providing necessary services.

There are several groups that have a higher need for affordable housing and have special housing needs. These groups have been identified as: the elderly and frail elderly, persons with disabilities (mental, physical, developmental), victims of domestic violence, youth (in general and aging-out foster youth), and members of the Santa Monica Service Registry, which is a by-name list of the most vulnerable chronically homeless individuals as determined by length of time on the streets, age, and physical and mental health conditions. City-funded multidisciplinary teams combine street outreach, medical provision and behavioral healthcare with case management support and housing navigation services, with the goal of meeting immediate needs while connecting participants experiencing homelessness to long-term housing resources. Seniors and people with disabilities are more likely to face housing instability and have difficulty affording housing due to often living on fixed incomes that does not keep pace with cost of living. Seniors and people with disabilities also have a need for accessible housing to support aging in place and independent living, whether for new housing, rehabilitated existing housing, or the adaptation of the housing they currently occupy. In addition to general challenges, seniors may have additional supportive needs resulting from increasing physical and/or cognitive conditions.

### **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**

As part of the Coordinated Entry System (CES) for Los Angeles County, Santa Monica homeless service agencies use the VI-SPDAT triage pre-assessment tool to assess an individual's strengths and challenges in areas of housing, risky behavior, socialization, and wellness (health and behavioral health). The VI-SPDAT indicates the most appropriate intervention, with low scores indicating a need for light services and high scores indicating a need for more intensive services up to and including permanent supportive housing.

The City also funds two types of street engagement teams: one HMST (Homeless Multidisciplinary Street Team) and three C3 (City, County, Community), both of which are operated by local nonprofit The

People Concern. HMST is dedicated to working with the highest utilizers of fire and police services, while the C3 team focuses on the geographic areas most impacted by homelessness, including the downtown area and the beach. These teams engage individuals with street-based medical and behavioral health interventions to help stabilize behaviors while linking people to resources and housing. In support of these efforts, City Council approved use of Measure CS funds to add a third C3 Team to cover the remainder of the city started operating on July 1, 2023. In calendar year 2023, the multidisciplinary teams made 8,193 contacts with people experiencing homelessness and provided direct medical or psychiatric services to 1,012 participants. In 2023, these teams placed 45 people into interim housing and 13 into permanent housing. As part of the CES for Los Angeles County, the teams utilize the VI-SPDAT to prioritize highly vulnerable households for housing placement. Using the City's HMIS and monthly coordination meetings, the City works closely with local and regional providers to track the progress of these individuals, providing advocacy and resources in order to shorten the length of homelessness. The Downtown Santa Monica Ambassadors also support the multidisciplinary teams, providing outreach and referrals to individuals wherever they may be.

In addition, the City utilizes first responders to engage and assess the needs of homeless individuals. The Santa Monica Police Department (SMPD) maintains a specialized Homeless Liaison Program (HLP) Team of nine officers and a sergeant who work in conjunction with local nonprofits and City departments to identify vulnerable individuals and coordinate services. SMPD also provides training to all patrol officers on safe and appropriate methods for engaging and de-escalating people with mental illness. SMPD has developed the first POST (Peace Officer Standards and Training)-approved homeless curriculum in the state, which has been offered to sworn and civilian personnel from across the country.

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

While the City continues to support over 240 year-round interim housing beds in the community through direct funding, leases, and regional partnerships, shelter capacity has fluctuated due to COVID outbreaks at interim housing facilities and subsequent reduced capacity. The City continues to support efforts to increase regional bed capacity through its participation in the Westside Cities Council of Government (WSCCOG). The WSCCOG is a vehicle through which the City champions regional solutions and problem solving in tandem with the leadership of neighboring communities. City Council has identified the redesign of the SAMOSHEL interim housing program as a priority, and has supported the use of Measure CS funds for this initiative. The redesign will accommodate 24/7 intakes, giving additional options for after-hours intake and facilitating first responder transports for people experiencing homelessness and non-urgent behavioral health issues. In 2023, the City partnered with the LA County Homeless Initiative to start a Pathway Home project which is a collaboration between a local motel operator, social service provider, LA County DHS, and LAHSA to move people from encampments into motel rooms and provide case management, housing navigation, and time limited subsidies for permanent housing. The program will launch in 2024.

### **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**

Many households who become homeless experience episodes of homelessness perhaps once or twice in a lifetime and for periods of less than a year. They are often families, including families with children, and are often homeless because of a particular crisis such as loss of income, eviction, foreclosure, illness, disaster, or calamity (fire, flood, condemnation of unsafe housing). The greatest challenge for this segment is finding affordable housing.

The City uses the county's vulnerability assessment tool to prioritize highly vulnerable households for permanent housing. Using the City's HMIS and monthly care coordination meetings, the City works closely with local and regional providers to track the progress of these individuals into housing, assisting with advocacy and resources to remove system and process barriers in order to shorten the length of homelessness. Care coordination meetings are conducted virtually via teleconference. The City also maintains a variety of resources to help transition homeless individuals and families into permanent housing, and support them over time. Direct financial assistance is provided to support the moving process, including move-in costs (security deposits, moving expenses), basic furniture, and rental application fees. Once housed, the care coordination efforts continue to ensure that households do not return to homelessness. City-funded housing programs are required, as part of their contract agreement, to notify the Housing and Human Services Department if tenants are at risk for eviction. The City also funds legal services to prevent eviction, address tenant harassment and discrimination against people who are disabled or have a history of homelessness, and offers emergency rental assistance to prevent eviction.

In 2021, under the American Rescue Plan, the Department of Housing and Urban Development (HUD) allocated 104 Emergency Housing Vouchers (EHVs) to the City to be issued to people experiencing or at risk of homelessness. The City prioritized its allocation of EHVs to exit people in local shelter programs and unsheltered individuals referred by City-funded street engagement teams into permanent housing with supportive services. Households with EHVs are prioritized for permanent housing through the City's Below Market Housing waitlist. As interim housing beds become available, City staff are working closely with SMPD, SMFD and the City's multidisciplinary street teams to refer vulnerable individuals from our streets, parks, and open spaces to available shelters, housing navigation resources, and/or permanent housing opportunities. EHV participants began moving into their own apartments in February 2022. To date, 59 people experiencing homelessness have ended their experience of homelessness in Santa Monica using EHVs. In 2023, the City received an allocation of 15 Housing Stability (HS) vouchers from LAHSA and is working with the local outreach teams and interim housing programs to match eligible people experiencing homelessness to these resources.

**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.**

(Actions to address the issues noted in this Action Plan include:

- Increase the supply of and access to supportive housing and supportive services for special needs populations
- Assist the homeless and those at risk of homelessness with access to permanent affordable housing and supportive services that promote housing stability
- Coordinate homeless services, including services for those at-risk of homelessness, and encourage collaboration among providers

As part of the City's Human Services Grants Program, homeless services agencies and other non-profits are funded to provide housing retention services, supportive services to build income, health and behavioral health services, legal services, and benefits assistance that enable people to retain their housing. The City's Senior & Disability Housing Task Force meets to identify older adults and people with disabilities at imminent risk of losing housing and collaborate on solutions to keep them housed in the appropriate level of care. The City also continued its Preserving Our Diversity (POD) program, which provides cash-based assistance to low-income, long-term rent control senior households to help them achieve a minimum monthly after-rent income for basic needs. As of February 2023, 206 low-income senior households had enrolled in POD. In 2024, the City is embarking on a strategic planning process to meet the needs of older adults and people with disabilities in Santa Monica, including strategies to prevent homelessness and promote housing stability.

As pandemic-era restrictions on evictions lifted in 2022 and 2023, landlords began pursuing evictions much more frequently. As of August 2023, eviction filings had increased above pre-pandemic levels, reversing a years long downward trend in the total number of eviction filings. In the face of this data, City Council approved new tenant protection laws. The City also hosts regular tenant/landlord forums. The City also funds Legal Aid Foundation of Los Angeles (LAFLA) to investigate harassment claims and provide representation to low-income tenants to prevent unlawful evictions. In 2021, City Council approved additional funding to LAFLA to launch a Right to Counsel program to provide additional representation for tenants facing eviction, as well as new and expanded case management and paralegal services in 2022 to help support vulnerable tenants.

The City also continued its Preserving Our Diversity (POD) program, which provides cash-based assistance to low-income, long-term rent control senior households to help them achieve a minimum monthly after-rent income for basic needs. As of February 2023, 206 low-income senior households had

enrolled in POD.

In light of the COVID-19 pandemic, the City implemented a number of strategies to help prevent evictions. In March 2020, the City enacted a local eviction moratorium to keep renters impacted by COVID in their homes. The City also implemented the COVID Emergency Rental Assistance Program (ERAP) using CDBG and General Funds to provide 638 households economically impacted by COVID with three months' rent up to \$5,000. In summer 2021, staff created an enhanced outreach campaign to inform renter residents and property owners about the State COVID-19 Rental Assistance program, *Housing is Key*. Since outreach began in August, an estimated 1,400 additional applications were submitted by Santa Monica residents. Approximately 1,800 Santa Monica households were served with an average assistance of \$15,000 and \$28,150,675 total funds paid.

The 2022 General Adjustment (GA) of 6% increase for rent-controlled units was the highest increase since 1990. An increase of this magnitude was expected to lead to greater housing instability in the community. In response, the City of Santa Monica developed the Rent Control Adjustment Relief (RCAR) Program, and an Eviction Protection Ordinance for qualifying tenants who need more time to pay the increased rent. The RCAR Program provides relief equivalent to a 3% rent increase over a 12-month period to be paid directly to the property owner/manager in a single lump sum. Over the course of the RCAR program, the City issued 502 payments at a total sum of \$329,612 .

The City also works with the Westside Coalition, which meets monthly to discuss advocacy and to coordinate with publicly-funded institutions that may discharge persons into homelessness. City staff coordinates with SMPD and the City Attorney's Office (CAO) to divert individuals from local jail to available social services and court-based alternative justice options. In 2023, the City approved utilizing HOME-ARP funding for a diversion program called Shelter, Treatment and Empowerment Program (STEP) Court which is a redesign of the Homeless Community Court and will launch in 2024

## **Discussion**

N/A



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

### **Introduction:**

The Housing Element of the City’s General Plan recognizes concerns about affordable housing and addresses them through several goals, specifically: identifying programs to assist in the production of affordable units, protecting and rehabilitating affordable units, and providing assistance to low- and moderate-income households and households with special needs. The City continues to monitor, analyze, and address market conditions and governmental factors that may act as barriers to affordable housing.

Though public policies are meant to address the overall needs of citizens, they may cause inadvertent negative effects on certain aspects of the community, which in this case are affordable housing and residential investment. Affordable housing and public and private residential investments are key components to furthering fair housing in any community. In part, to identify these negative effects and further the purposes of the Fair Housing Act, the U.S. Department of Housing and Urban Development (HUD) established a legal requirement that entitlement grantees, such as the City of Santa Monica, shall affirmatively further fair housing. The primary tool for communities to identify contributing factors for these barriers to fair housing is the HUD Assessment of Fair Housing (AFH).

In 2020, the City of Santa Monica completed an AFH, which outlined contributing factors to fair housing issues in the City. The 2020 AFH prioritized the identified contributing factors, of which these were the leading priorities within the City:

1. Displacement of residents due to economic pressures
2. Impediments to mobility
3. Lack of access to opportunity due to high housing costs
4. Lack of affordable, accessible housing in a range of unit sizes
5. Land use and zoning laws
6. Private discrimination

A list of Medium and Low Priority Contributing Factors to Fair Housing Issues can be viewed in the AFH. Through the identification, evaluation, and ranking of Contributing Factors to Fair Housing, the City was able to propose four (4) goals with associated strategies to affirmatively further fair housing in Santa Monica. Below is a list of proposed goals (a list of strategies for each goal can be viewed in the 2020 AFH).

Goal 1: Increase the supply of affordable housing

Goal 2: Preserve the existing stock of affordable rental housing and rent stabilized housing

Goal 3: Prevent displacement of low- and moderate-income residents

Goal 4: Increase community integration for persons with disabilities

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

Governmental restrictions may constrain the production of affordable housing. The City of Santa Monica continues to monitor, analyze, and address as necessary, governmental regulations, land use controls and residential development standards that affect the production and preservation of affordable housing.

Fair housing is crucial to ensuring that persons of all income levels have equal access to housing. HUD requires that jurisdictions receiving federal funds commit to affirmatively further fair housing. According to HUD, a fair housing impediment is considered to be “any action, omission, or decision which has the effect of restricting housing choice or its availability because of race, color, religion, sex, disability, familial status, or national origin.” A key part to affirmatively furthering fair housing is the preparation of an Assessment of Fair Housing Plan, approved by the City Council on April 28, 2020. The Assessment of Fair Housing Plan is available at [www.santamonica.gov/housing-policy-and-reports](http://www.santamonica.gov/housing-policy-and-reports).

The City of Santa Monica’s Public Rights Division (formerly Consumer Protection Unit) in the City Attorney’s Office takes an active role to ensure fair housing opportunities are enforced. The Public Rights Division has two primary responsibilities: Enforcing local, state, and federal laws to assure that consumers are treated fairly and lawfully; and investigating complaints involving charges of discrimination based on race, age, children, marital status, sex, sexual orientation, national origin, disability, religion, or infection with HIV. The Public Rights Division also educates tenants, landlords and the real estate community on fair housing laws, provides referrals to mediation services, and conducts community outreach throughout the year.

The City’s Rent Control Board also monitors evictions and advises Santa Monica tenants of their rights.

Santa Monica’s Just Cause Eviction and Tenant Harassment laws, among others, help to assure that tenants are not discriminated against by building owners. Other agencies, such as the Santa Monica Housing Authority, Legal Aid Foundation of Los Angeles, California Department of Fair and Equal Housing, and HUD also offer assistance to persons with fair housing issues.

New housing developments subsidized by federal funding must have an Affirmative Fair Housing Marketing Plan, which sets the steps that developers or property managers must take to reach out to various populations during property rental or sale. The Marketing Plan specifically targets potential tenants, underrepresented minorities, economically-disadvantaged populations, and low-income homebuyers to better integrate them into the community. Market factors that tend to restrict affordable housing production are high land costs, high construction costs, and the availability of financing. To help mitigate the high cost of housing development in Santa Monica, the City has historically provided a program to make “gap” financing available for affordable housing projects. In November 2016, Santa Monica voters adopted Measures GSH and GS to provide a local, ongoing revenue source through a transaction and use tax, to fund nonprofit affordable housing development. In November 2022, Santa Monica voters adopted Measure GS to provide another local, ongoing revenue source through a property transfer tax, to fund homeless prevention and affordable housing programs. The City's Housing Element recognizes the role of land use regulations in housing development and has reduced regulatory barriers and streamlined development approval processes to facilitate the production of affordable units, protection and rehabilitation of affordable units, and the provision of assistance to low and moderate income households and households with special needs.

**Discussion:**

N/A

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

### **Introduction:**

The City is committed to addressing the needs of underserved populations in the community and fully understands that to efficiently leverage CDBG funds, it is necessary to mitigate obstacles low-income families face in securing financial opportunities, affordable housing, and the safety of their homes.

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

The continued growth of regional needs for homeless services and housing retention is the greatest challenge to meeting underserved needs. Significant ballot measures in LA County, LA City and City of Santa Monica were passed by voters in 2016 and 2017 to increase the resources available to tackle this problem. In February 2024, the Board of Supervisors unanimously approved a \$783 million budget for the Los Angeles County Homeless Initiative for fiscal year 2024-25. The FY 2024-25 allocation includes \$1,626,187 in Local Solutions Funds (LSF) to the Westside Cities Council of Governments (WSCCOG), a 9 percent increase from the previous year's LSF allocation. The City will identify opportunities to leverage these funds through its participation in the WSCCOG. Regionally, the City will continue to participate in working groups to strategize the application of new resources to fund the critical services proposed in the City and County of LA homeless strategies, adopted in February 2016.

The City also has the opportunity to expand services addressing homelessness using two new funding streams, Measure CS and Measure GS, approved by Santa Monica voters in November 2022. The new on-going revenue streams that will be generated through Measures CS and GS will provide the infusion of funds necessary to develop a comprehensive homelessness strategic plan and accelerate the City's work on addressing homelessness, producing and preserving affordable housing, preventing homelessness, and maintaining clean and safe public spaces. Council has approved a number of priorities under Measure CS funds, including preparation of a comprehensive Homelessness Strategic Plan (HSP), expansion of homeless multi-disciplinary teams, redesign of the SAMOSHEL interim housing program to accommodate 24/7 intakes, and expansion of the Police Department's Homeless Liaison Program (HLP). Measure GS will provide resources to produce and preserve affordable housing and prevent homelessness at a scale far beyond the City's current administration.

Addressing the behavioral health needs of vulnerable residents remains a significant unmet need. In October 2022, the City entered into a contract with Initium Health to lead the Behavioral Health Feasibility Study to assess the needs of all populations in Santa Monica. Initium is nearly completed with the phase study which includes facilitating a community engagement process, developing a behavioral health strategy and operational/financial feasibility assessment for a behavioral health center, and conducting a behavioral health center feasibility assessment. In 2024, the City will expand upon this work by partnering with the WSCCOG to begin development of a regional behavioral health center. In addition, the Providence Saint John's Development Agreement was adopted with community benefits including ten units of deed-restricted affordable housing and a significant financial investment of at least

\$10 million to support the City's behavioral health initiatives.

In November 2022, the Human Services Division (HSD) helped launch a three-month pilot with WISE & Healthy Aging (a local senior services provider) and the Santa Monica Fire Department (SMFD) to target a small group of seniors who are frequent users of the 911 system and are at high risk for eviction or premature institutionalization. The City is secured funding through the WSCCOG to dedicate a part-time WISE case manager to work with this group of vulnerable seniors.

In addition to existing programs such as the multidisciplinary street outreach teams and the WISE + SMFD pilot, the City is partnering with the LA County Department of Mental Health (DMH) to address non-violent mental health crisis calls for service. After extensive planning and preparation in 2023, the City launched the pilot in January 2024, which provides a specialized therapeutic transport team that will be available five days a week to assist Santa Monica Police and Fire personnel with 911 and non-emergency calls for service that involve someone experiencing a mental health crisis. The partnership with DMH is part of Santa Monica's push to collaborate with regional service providers for a coordinated, holistic approach to addressing homelessness.

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

The City places great emphasis upon seeing that decent, safe, affordable housing is available for low-income residents to the extent possible. Homeless activities, ranging from providing emergency shelter to preventing homelessness receive a high priority. Thus, the City will focus on multiple efforts including rental assistance, new rental construction (using local, non-federal funds), as well as home modifications to accommodate persons with special needs and in many instances prevent homelessness.

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

Since inception of the CDBG program, all homes older than 1978 scheduled for rehabilitation activities receive lead-based paint testing to determine the extent of lead hazards, and where appropriate, remediated in conjunction with the rehabilitation. Any lead found was addressed by interim controls and abatement through covering and/or painting.

The City will also continue to take the following actions this program year to meet lead-based paint requirements:

- Report incidents of lead-poisoning to the Los Angeles County Health Department
- Incorporate lead-based paint hazard reduction procedures into rehabilitation guidelines
- Develop and distribute lead-based paint reduction and abatement information to all landlords, managers, tenants, or owner-occupants of rehabilitation properties, as well as to community groups

- Work cooperatively with its nonprofit housing providers and community health organizations to provide educational material and identify potential sources of lead poisoning in City-assisted affordable housing projects
- Apply housing quality standards to inspections of Section 8 units and assess risks of exposure to lead based paint for households with children six years of age and under and report any findings to HUD on a quarterly basis
- Address blight in individual buildings by eliminating specific conditions that present health and safety hazards to the public
- Provide lead-based paint testing and remediation to existing single- and multi-family units, targeting low and moderate income households. While the health department formerly provided reports on lead-based hazards to the City, that data is no longer made available to housing authorities

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

The City’s anti-poverty strategy is part of a coordinated effort to create jobs and improve the local economy. CDBG provides core funding for critical basic needs including health, housing, and employment because the creation of economic opportunities is not an isolated solution to alleviating poverty. The City works with community partners to identify educational, life skills and training needs and provide opportunities for self-empowerment that will enable low- and moderate-income residents to become and continue to be self-sufficient and economically independent. These programs have an immediate impact on primary needs of the low-income population and the causes of poverty. The City will continue to implement the anti-poverty strategy outlined in the Consolidated Plan. This includes continued prioritization of housing and homeless programs per HUD requirements, as well as other programs that address the following:

- Pre-vocational and job readiness skills training including assessment and assistance with applications, resumes, job-seeking skills, and work performance standards
- Job development and placement for temporary and permanent employment opportunities with businesses, industry, and government
- Apprenticeships and training linkages with skills center and other vocational resources
- Educational enrichment, skill-building, and parental support to encourage children and youth to be healthy, succeed in school, avoid gang activity, and prepare for productive adulthoods
- Youth skill-building and development to design innovative and creative alternatives to criminal involvement, youth violence, isolation, and loss of opportunities for growth
- Legal services to include brief service and full representation in landlord/tenant matters, public benefits assistance, discrimination, consumer affairs, and other critical legal aid
- Domestic violence intervention and prevention that offers counsel and advice, immediate assistance in obtaining restraining, stay-away and other protective orders, and critical support services to victims of domestic violence
- Independent living skills and assistance and peer counseling to ensure full self-sufficiency and

independence among the elderly and people with disabilities

- Childcare subsidies (infant, preschool and elementary) and assistance to working parents
- Free health care and supportive service assistance to extremely low, very low, and low- income Santa Monica residents including vital assistance to those with HIV/AIDS
- Wrap-around assertive case management for vulnerable youth and their families, including access to flexible funds for emergency situations and homelessness prevention

The City continues to implement its Living Wage Ordinance, which requires all contractors with service contracts greater than \$54,200 to pay their employees a living wage. The living wage is updated annually. For FY 2023-24 the living wage was set at \$19.73 per hour.

Additionally, the City continues to leverage other federal, state, and local funds to assist homeless and near homeless households with rental assistance, housing search and placement, and legal and credit repair services.

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

See response below

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

The City has identified gaps in institutional structure for implementing the Consolidated Plan and ways to enhance coordination among housing agencies and social service providers. These gaps included a lack of sufficient resources and the need for better information dissemination and sharing among agencies and organizations that provide services. As noted in section PR-10 of the Consolidated Plan, the City has been proactive in addressing these gaps and undertaken a number of specific actions to overcome these gaps.

The City will continue to work with other agencies and departments in several areas including social services, lead abatement, and mental health services, and will continue to seek to establish new relationships with the private sector to accomplish economic and community development activities.

The City also currently coordinates housing and services for homeless and formerly homeless households through monthly Chronic Homeless Project case conferencing meetings, led by Human Services staff with representatives from all City-funded homeless programs, County Mental Health and SMPD. The Senior & Disability Housing Task Force is also enhancing coordination between housing and social service agencies and allowing for early intervention to prevent housed older adults and people with disabilities from becoming homeless. Policy coordination occurs through formal quarterly meetings with Human Services and Housing Authority staff, in addition to frequent informal communications to collaborate on shared program participant issues. Human Services Division staff also attend regular

case-conference meetings with affordable housing and service providers to support vulnerable clients at risk of eviction.

The Santa Monica Housing Authority participates in meetings with The People Concern to better communicate regarding rules, regulations, and procedures related to Continuum of Care voucher, Emergency Housing Voucher, and HOME voucher programs and update the staff of The People Concern on the status of their referrals for these programs. City staff participate in regular meeting with The People Concern and Upward Bound House to better communicate regarding rules, regulations, and procedures related to the Emergency Housing Voucher program and to support with efficient lease up, as well as regular meetings with The People Concern and Upward Bound House and local affordable housing operators to support with lease ups, as well as coordinate on case management and housing stability plans. In the fall of 2023, the City's Housing and Human Services Department started meeting with EAH Housing and The People Concern regarding a Permanent Supportive Housing (PSH) development called The Laurel that is scheduled to open in the spring of 2024 and serve highly vulnerable people experiencing homelessness and at risk of homelessness.

The City will continue supporting the efforts of the Santa Monica Housing Authority in the administration of all its voucher programs.

**Discussion:**

***Identify any specific economic development initiatives included in the jurisdiction's Comprehensive Economic Development Strategy (CEDS). If the jurisdiction does not have a CEDS, please describe other local/regional plans or initiatives that impact economic growth.***

The City does not have a stand-alone Comprehensive Economic Development Strategy (CEDS). Rather, Santa Monica's economic development efforts are led by the Community Development Department (CDD). CDD facilitates new investment and encourages economic activity consistent with the City's adopted land use policies, as articulated in the City's comprehensive and holistic Santa Monica Land Use and Circulation Element (LUCE) and in the City's Downtown Community Plan (DCP). Both the LUCE and the DCP provide a long-term framework for implementing the City's economic development goals and establish criteria for periodically assessing how well the community's goals are being met and if adjustments to the policies are necessary. Specific ED initiatives include providing support to four business improvement districts and a property-based assessment district, the implementation of the citywide Buy Local Santa Monica campaign in partnership with the City's business community and leasing of City-owned property to support local business activity.

***Please describe City initiatives/provider partnerships aimed at narrowing the digital divide through the provision of broadband internet service and aimed at narrowing the digital divide.***

The City of Santa Monica launched its Digital Inclusion Pilot in November 2015, with the goal of connecting 100% of its multi-tenant affordable housing buildings in several phases. Currently



approximately 20% of the affordable housing buildings are connected. Residents are provided free internet in the Community Rooms available for K-12 afterschool programs, and adult technology trainings sponsored by non-profit groups in the evenings. For residents requesting residential service to their housing units, the very affordable \$48/month Gigabit broadband service is provided after completion of a basic network troubleshooting course provided by the City. The goal is to facilitate interest in technology with a basic level of networking education while reducing network support costs for low-level support incidents. Currently over 100 households are paying subscribers, and over 500 households are served annually with the City's free Community Room services.

***Please describe City initiatives/agency partnerships that support the management of flood prone areas, public lands or water resources, and emergency management agencies.***

The City of Santa Monica's Office of Emergency Management routinely collaborates with multiple organizations and jurisdictions through their Operational Area partnership program. To mitigate flood risk, whether related to rainfall, dam failures, or coastal flooding, the partnership program is convened to discuss new and existing hazards within the region, and specifically to address hazards which can impact multiple jurisdictions. Through these partnerships, robust emergency planning allows for the organization to address waterways or spillways through the city, and conduct emergency response exercises to address new and ongoing concerns associated with flood prone areas.

Through regular hazard identification and mitigation efforts conducted by the City, the organization routinely discourages the new development of structures in locations which can destroy natural barriers or increase the hazard vulnerability of the city due to development in high-hazard areas.

## Program Specific Requirements

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

#### Introduction:

The City currently uses various administrative mechanisms to monitor progress of HUD-funded projects and activities that are under its control and jurisdiction. The goal is to ensure that Consolidated Plan and Annual Action Plan activities are carried out in a timely manner in accordance with federal regulations and other statutory or regulatory requirements. The City's primary monitoring goals are:

- Provide technical assistance to grant administrators and staff
- Ensure activities are carried out in compliance with federal, state, and local requirements
- Identify deficiencies and promote corrections in order to improve the City's ability to adhere to the Consolidated Plan objectives and annual goals

City staff participate in regular meetings and communicate with subrecipients as needed to discuss project or program progress.

All Requests for Proposal (RFPs) and contracts are reviewed carefully to ensure compliance with HUD and local requirements for program delivery, financial management, procurement, personnel matters, and other such requirements. Subrecipients are required to enter into agreements that specify objectives, scope of work, applicable timelines, performance targets, budget, federal, state, and local regulatory requirements, and monitoring and reporting requirements.

In addition, the City may undertake activities through the City's Capital Improvement Program (CIP), which funds the acquisition, expansion or rehabilitation of land, buildings, and other major infrastructure. Projects included in the CIP budget exceed \$50,000 and involve public works construction.

During project implementation, subrecipients are required to submit periodic reports detailing progress toward objectives, problems and/or resolution to meeting goals, and quantitative participation data by ethnicity, income, and household status. Periodic reports and payment requests are reviewed for compliance with the project agreement, budget consistency, and documentation of expenditures. Subrecipients are advised of any procedural errors and/or ineligible activities, and provided with technical assistance as needed.

Upon project completion, project sponsors are required to submit completion reports identifying program/project accomplishments, including number of persons or households served, ethnicity, and income level.

The City and subrecipients shall comply with participant eligibility requirements for CDBG funded

projects as detailed in 24 CFR Subpart C of the HUD Regulations and 24 CFR Part 92 for HOME projects. The City or subrecipients collect income verification documentation at the time of intake and at least annually while the participant is receiving CDBG-funded services or during project construction.

Projects are subject to performance monitoring during implementation or following completion. Priority for monitoring engagements may be given to high-risk programs.

Affordable housing development projects must submit annual compliance reports throughout the period of required affordability. Reports are designed to ensure continued compliance with federal regulations, affordability and use restrictions, and other requirements as specified in project loan documents. In addition, all HOME-assisted projects will be subject to periodic on-site inspections to ensure continued compliance with federal housing quality standards.

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

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>50,000</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

HOME program resources are as follows:

- The projected 2024-25 HOME allocation of \$634,974.
- Estimated Program income of \$40,000 from loan repayments from affordable housing developments originally funded with HOME.
- Repayments: None, see below.
- Recapture funds in local account: None, see below.

These funds will be used towards HOME Admin and TBRA as described in AP-35 Projects. The City does not use HOME funds in any other manner than those described in Section 92.205

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Not applicable. The City does not use HOME funds for homebuyer activities

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City does not use HOME funds for homebuyer activities. When HOME funds are used to acquire residential rental property dedicated as affordable housing, the City applies its Housing Trust Fund Guidelines, which require 55 years of affordability.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable. The City does not use HOME funds to refinance existing debt. The HOME TBRA program provides rental subsidies for households whose income is at or below 60% AMI up to 24 months or longer with an extension and if funding is available. Targeted populations include tenants at-risk of losing their housing and becoming homeless (such as rent burdened households), seniors, persons living with permanent disabilities, and persons experiencing homelessness. The program is managed by the Santa Monica Housing Authority (SMHA) and operated with guidance from the SMHA Administrative Plan. Required lease terms are specific to HOME regulations. Further details about the TBRA program can be obtained from SMHA staff at 310-458-8743.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with

special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The HOME TBRA wait list does have a preference for persons with disabilities and seniors. To receive the disabled preference, the person must present evidence of disabling condition diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. To receive the senior preference, the person must be 62 years of age or older. People can qualify for both preferences if they are 62 or older and are disabled.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

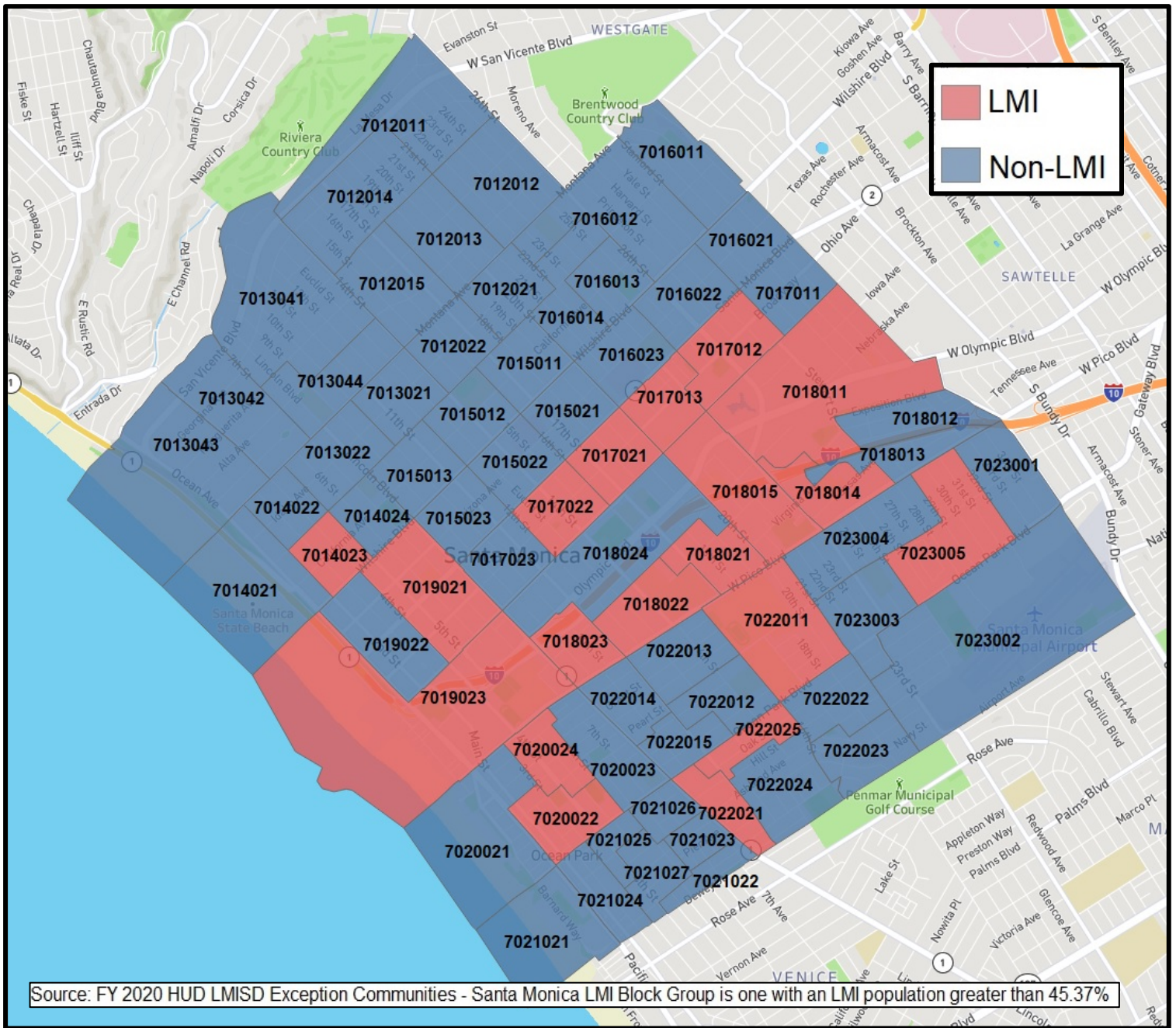
The preference for disability is not based on any specific diagnosis. However, it does narrow the gap in benefits between those individuals who are disabled and/or are seniors and those who are not. Seniors and persons living with disabilities do not as many options for employment compared to other low-income individuals who are not seniors or living with disabilities. Seniors and persons living with disabilities are therefore more vulnerable to rising rents which put them at greater risk of homelessness.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable. HOME funds used exclusively for TBRA and administration.

# CITY OF SANTA MONICA

## Low & Moderate Income Block Groups



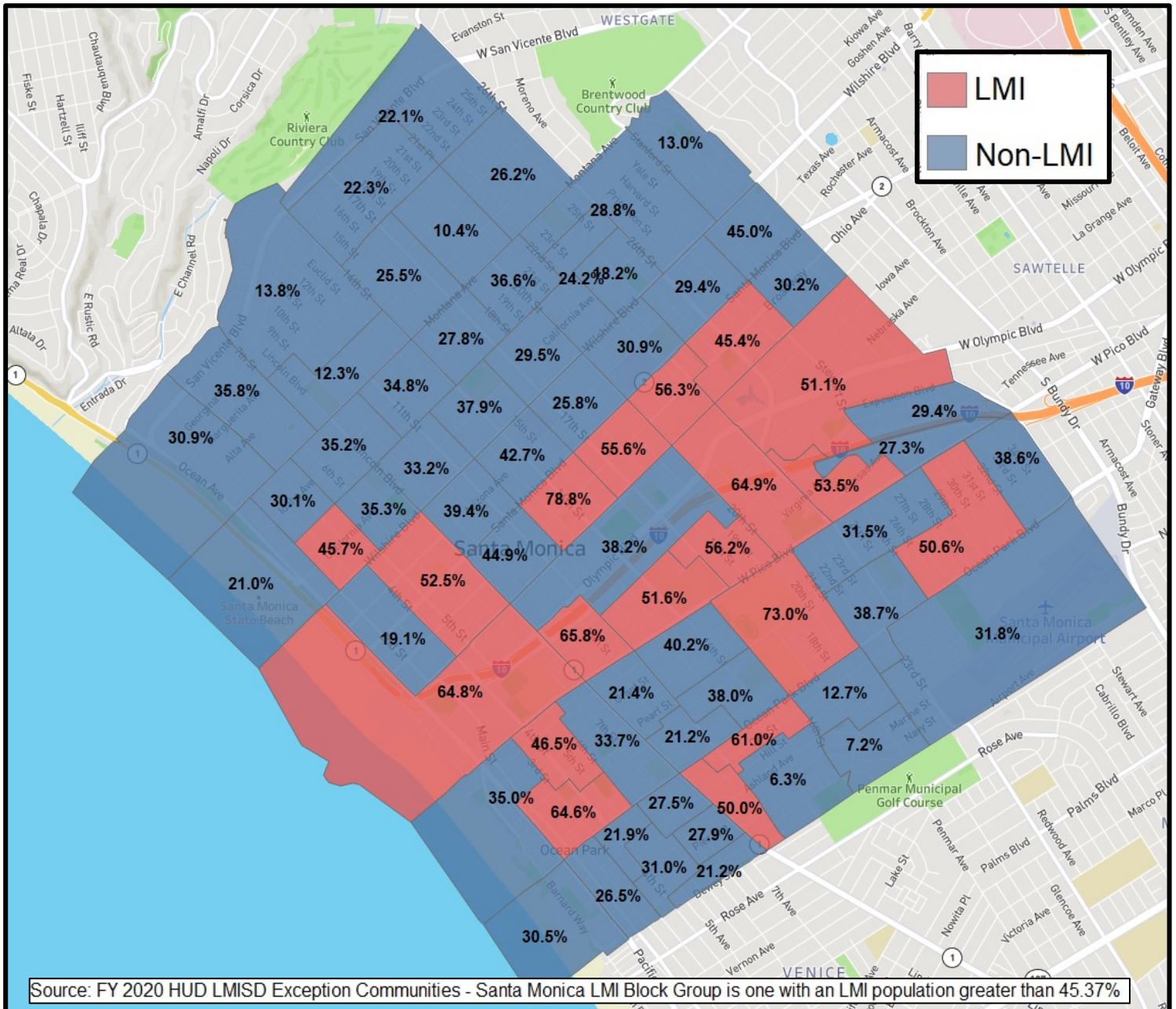
Santa Monica is an exception city. Low & Moderate Income Areas are defined by census block groups with 45.37% or more of the population considered low/moderate.

CDBG law authorizes an exception for grantees with few or no areas in which 51% of the residents are low and moderate income to be able to undertake area benefit activities.



# CITY OF SANTA MONICA

## Percent of Low & Moderate Income by Block Groups



Santa Monica is an exception city. Low & Moderate Income Areas are defined by census block groups with 45.37% or more of the population considered low/moderate.

CDBG law authorizes an exception for grantees with few or no areas in which 51% of the residents are low and moderate income to be able to undertake area benefit activities.