WORK SESSION AGENDA

Monday, March 22, 2021 at 1:00 PM

Mayor Ken Miyagishima

Mayor Pro Tem Kasandra Gandara

Councilors
Tessa Abeyta-Stuve
Gabe Vasquez
Johana Bencomo
Gill Sorg
Yvonne Flores

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Council Work Session Summary

Meeting: Work Session - Mar 22 2021

TITLE: ARMS QUARTERLY UPDATE

PURPOSE(S) OF DISCUSSION: ☒ Inform/Update ☐ Direction/Guidance ☐ Legislative Development/Policy

BACKGROUND / KEY ISSUES / CONTRIBUTING FACTORS:

ARMS is the Alliance for Regional Military Support. It is non-profit 501 (c)6 organization whose sole mission is to support the three military installations in the region referred to as the TRIAD: White Sands Missile Range, Holloman Air Force Base, Fort Bliss and by extension William Beaumont Army Medical Center, and our adjoining communities of Las Cruces, Alamogordo and El Paso. The focus areas are to grow the missions of each installation and to retain, attract and recruit defense-related industries to the region, working in partnership with the economic development entities of Mesilla Valley Economic Development Authority, Border Industrial Association, and Borderplex Alliance. The City entered into an agreement with ARMS in late 2020 to perform promotion and advocacy services; this will be the organization's first quarterly update to Council on its efforts.

City of Las Cruces
MOUNTAINS OF OPPORTUNITY

Council Work Session Summary

Meeting: Work Session - Mar 22 2021

TITLE: 2021-2025 CONSOLIDATED PLAN

PURPOSE(S) OF DISCUSSION: ☒ **Inform/Update** ☐ **Direction/Guidance** ☐ **Legislative Development/Policy**

BACKGROUND / KEY ISSUES / CONTRIBUTING FACTORS:

The City of Las Cruces, as both an entitlement community for the Community Development Block Grant (CDBG) program and a participating jurisdiction for the HOME program from the Department of Housing and Urban Development (HUD), must develop and adopt a 5-year plan that identifies the community development and affordable housing needs that the City will attempt to address during the plan period. This plan is known as the Consolidated Plan (Con Plan) and has been developed in accordance with HUD regulations that also require City Council approval of the plan. The proposed Con Plan is for HUD program years 2021 to 2025, which corresponds with fiscal years 2022 to 2026. The City's Con Plan also includes the required Analysis of Impediments to Fair Housing Choice (AI) and 2021 Action Plan (AP).

The draft Con Plan, AI, and AP were developed between September 2020 and March 2021. The Plans are available for public comment and review from March 15, 2021, until April 15, 2021. These plans must be submitted to HUD no later than May 14, 2021.

The Con Plan has identified the following goals:

Goal 1: Low-to-moderate-income residents will have access to safe, decent, and affordable housing.
Goal 2: Improve access to current programs for health and safety, information, transportation, and recreation services.
Goal 3: Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development.
Goal 4: Enhance the quality and use of the physical infrastructure in Las Cruces.
Goal 5: Prevent and reduce homelessness.

The AI has identified the following impediments to Fair Housing Choices:

Impediment 1: Lack of knowledge about fair housing roles and responsibilities of consumers and providers.
Impediment 2: Discrimination by property owners and managers, against persons with disabilities and/or housing voucher programs limits these groups from equal access to housing.
Impediment 3: The increasing cost and scarcity of both rental and for-sale housing disproportionately impact low-income households as quantified in the Con Plan and the housing concerns section of the analysis of impediments.
Impediment 4: Loan denial rates remain relatively high for some racial/ethnic groups.

SUPPORT INFORMATION:

2021-2025 City of Las Cruces Consolidated Plan DRAFT FOR PUBLIC COMMENT 3-15-21
2021-2025 Las Cruces Analysis of Impediments - DRAFT FOR PUBLIC COMMENT 3-15-21

PLAN(S):

2021-2025 Consolidated Plan

COMMITTEE/BOARD REVIEW:

Affordable Housing Committee, Housing PRC

2021-2025 Five-Year Consolidated Plan

2021 Annual Action Plan

DRAFT FOR PUBLIC COMMENT

Prepared by:

Crescendo Consulting Group
90 Bridge Street, Suite 216
Westbrook, ME 04092

Prepared For:

City of Las Cruces

Housing and Neighborhood Services

March 11, 2021

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

1. Introduction

The City of Las Cruces New Mexico is submitting its 2021-2025 Consolidated Plan. This Plan has been prepared according to HUD requirements. The Plan will govern the City's investment of federal funds for persons experiencing homelessness, housing, and non-housing community development activities for the next five-year period. This plan will be updated annually through preparation of the Annual Action Plan.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

High priority needs identified in the Las Cruces Five-Year Consolidated Plan include both housing and non-housing community development, infrastructure, persons experiencing homelessness and special population needs. Las Cruces has developed and managed a robust Citizen Participation process to solicit resident input on priority needs. The City has integrated that Citizen Participation process with substantial research efforts to acquire hard data on the scope of those needs.

3. Evaluation of past performance

Overall, during the last five-year reporting period for Consolidated Annual Performance Evaluation Reports (CAPERs) the City has received satisfactory reviews regarding its performance in meeting goals set forth in the Five-Year Consolidated Plan and each year's Annual Action Plan. Additionally, HUD continues to conclude that the City of Las Cruces is administering its programs in a manner consistent with the applicable regulatory requirements. Review and conclusions are based solely on information available to HUD, and do not constitute a comprehensive evaluation or approval of specific activities. The City of Las Cruces has responded to all technical assistance provided as a part of any HUD review and evaluation.

4. Summary of citizen participation process and consultation process

Citizen and stakeholder participation components are a critical process in the development of the Consolidated Plan and are a priority for the City of Las Cruces. The Housing and Neighborhood Services Section of Economic Development encouraged meaningful public participation in the Consolidated Plan process, especially by low- and moderate-income residents, as well as those in legally protected classes. The department conducted a broad consultation process with public and private agencies that provide affordable/subsidized housing, homelessness prevention and intervention efforts, and health and public/human services.

Input from a broad range of citizens and citizen groups were collected during the development of the Five-Year Consolidated Plan. The public was encouraged to participate through multiple modes, including an online Citizen Survey, including 39,000 citywide mailers, 22,762 postcards targeting low-income census tracts, and 1,500 postcards handed out at a local food pantry; Multiple Public Hearings and Public Meetings; submittal of written comments regarding the draft Five-Year Plan; and the City Council Public Hearing to adopt the plan. The Housing and Neighborhood Services section of Economic Development notified the public about opportunities to participate in the process on the City website, through direct mailing to households in low- and moderate-income census tracts (in English and Spanish), through publications in local newspapers, through an interagency list serv, through non-profit and service providers, and through other means. Input from citizens was used when determining high priority needs and five-year goals to meet needs.

5. Summary of public comments

Public comments were received at virtual meetings held to gather input into community needs, were emailed to staff during the process of developing the Consolidated Plan, and at public hearings held to discuss the draft Consolidated Plan, Annual Action Plan, and Analysis of Impediments to Fair Housing. [Will update after the public comment period closes 4/15].

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

All comments were reviewed and considered as the Consolidated Plan was written and edits. The only comments not included in this document were those that were submitted with Citizen Surveys that included profane language.

7. Summary

The City of Las Cruces provided a variety of avenues for citizen comment and participation in Consolidated Plan development. Citizens were invited and participated in multiple community focus groups to provide their input and views on community issues. Due to the COVID-19 pandemic and in-person meeting restrictions, all community meetings were held virtually using Zoom. Meetings were held on various days and times with two Spanish language groups offered. Approximately 2,000 Citizens living in low-income census tracts were sent flyers about these meetings and the four public hearings held to review the draft Consolidated Plan, Annual Action Plan and Analysis of Impediments to Fair Housing. Over 940 residents completed the Citizen Survey online, in English and in Spanish. All input was reviewed and used to develop the Priority Needs and Goals within the Consolidated Plan.

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	LAS CRUCES	Housing and Neighborhood Services Section of Economic Development
CDBG Administrator	LAS CRUCES	Housing and Neighborhood Services Section of Economic Development
HOPWA Administrator		
HOME Administrator	LAS CRUCES	Housing and Neighborhood Services Section of Economic Development
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The Housing and Neighborhood Services Section of Economic Development is responsible for administering both the CDBG and the HOME programs.

Consolidated Plan Public Contact Information

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Housing and Neighborhood Services Manager
Economic Development Department
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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

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 Las Cruces coordinates city funded housing activities through the Affordable Housing Land Bank and Trust Fund Advisory Committee, and public service activities through the Health and Human Services Advisory Committee. The City will provide public service funding over the next five years to local non-profit agencies that serve special needs populations, primarily to the homeless, victims of domestic violence, and the disabled. Additionally, the City will provide HOME funds to non-profit housing providers for the development of single-family and multi-family housing, and affordable rental housing assistance.

The City will continue to coordinate efforts in the areas of homeless services and ending homelessness, including chronic homelessness, veteran homelessness for the Mesilla Valley Community of Hope campus and other homeless providers working in the City.

The City will continue to participate in meetings with outside partners in efforts to improve overall delivery of CDBG and HOME-funded projects, as well as public service and homeless providers on a regular basis.

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 falls under the jurisdiction of the New Mexico Coalition to End Homelessness (NMCEH), the New Mexico Balance of State Continuum of Care (CoC). The City participates with staff representation in the regular NMCEH meetings held as well as the NMCEH CoC Board meetings. Governmental and nonprofit agencies in the Balance of State cities and counties can apply annually for HUD Continuum of Care grants through the NMCEH.

Consultation with the CoC takes place with the NMCEH for the City's jurisdiction.

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

The City currently does not receive ESG funding. The NMCEH administers the operations of the HMIS system.

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 1 – Agencies, groups, organizations who participated

2	**Agency / Group / Organization**	La Casa, Inc.
	Agency / Group / Organization Type	Services - Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with Children
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	La Casa staff were key informants providing information about the needs of victims of domestic violence in Las Cruces. La Casa coordinates with the City of Las Cruces and other providers of services.
3	**Agency / Group / Organization**	Mesilla Valley Community of Hope
	Agency / Group / Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from the Mesilla Valley Community of Hope (MVCH) were key informants, providing insights and data related to the needs of homeless citizens in Las Cruces. MVCH coordinates with all other homeless service agencies and the City through the Continuum of Care and to ensure coordinated homeless service provision. MVCH is also the Coordinated Entry lead agency for Southern New Mexico.
4	**Agency / Group / Organization**	Veterans Administration
	Agency / Group / Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans
	How was the Agency / Group / Organization consulted and what are the anticipated	The VA VASH staff participated as key informants and coordinate with other homeless services providers, the City,

	outcomes of the consultation or areas for improved coordination?	and the Mesilla Valley Housing Authority to provide coordinated services to homeless veterans in Las Cruces.
5	**Agency / Group / Organization**	Casa de Peregrinos
	Agency / Group / Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Casa de Peregrinos staff provided information about food insecurity in Las Cruces and the high priority needs of low and very low-income households. The agency coordinates with other service providers in Las Cruces and with the City.
6	**Agency / Group / Organization**	JL Gray
	Agency / Group / Organization Type	Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	JL Gray property management and development staff were key informants who provided information and insights into the need for affordable housing.
7	**Agency / Group / Organization**	NMSU Economics Department
	Agency / Group / Organization Type	Business Leaders University
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from the NMSU Economics Department was a key informant discussing the employment needs in Las Cruces and the economic climate.

8	**Agency / Group / Organization**	Housing Policy Review Committee
	Agency / Group / Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Las Cruces Housing PRC provided insights into the housing market and housing needs in Las Cruces.
9	**Agency / Group / Organization**	Families and Youth, Inc.
	Agency / Group / Organization Type	Services - Children Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Unaccompanied Youth
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from FYI were key informants, and provided information about the needs of homeless youth, homeless youth programs, and programs for at-risk youth.
10	**Agency / Group / Organization**	Tresco, Inc.
	Agency / Group / Organization Type	Housing Services - Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or	Staff from Tresco were key informants providing information about persons with disabilities, and their needs for housing and services in Las Cruces.

	areas for improved coordination?	
11	**Agency / Group / Organization**	El Caldito Soup Kitchen
	Agency / Group / Organization Type	Services - Children Services - Elderly Persons Services - Persons with Disabilities Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The staff and board of El Caldito provided insights into the need for food and meals for homeless and low-income persons and households in Las Cruces. The agency works with other homeless and service providers to coordinate services in Las Cruces.
12	**Agency / Group / Organization**	Health and Human Services Advisory Committee
	Agency / Group / Organization Type	Services - Victims of Domestic Violence Services - Homeless Services - Health Services - Education Services - Employment Service - Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The HHSAC Committee met to provide insights into high priority public services needs within Las Cruces. The committee helps the city coordinate and prioritize funding requests for public services dollars.
13	**Agency / Group / Organization**	New Mexico Department of Health, Public Health Division
	Agency / Group / Organization Type	Services - Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and	Doctors and Health Promotion program managers provided information and insights into the challenges faced by persons

	what are the anticipated outcomes of the consultation or areas for improved coordination?	with HIV/AIDS in Las Cruces and coordination for service delivery for this population.
14	**Agency / Group / Organization**	Dona Ana County Health and Human Services
	Agency / Group / Organization Type	Health Agency Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Dona Ana County HHS provided information about gaps in the healthcare system for low-income residents of Las Cruces, and the challenges of bringing high quality care to the community.
15	**Agency / Group / Organization**	Jardin de los Ninos
	Agency / Group / Organization Type	Services - Children Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with Children
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Jardin de los Ninos staff were key informants providing information regarding homeless children and families that they serve, and their services. The agency coordinates with other homeless providers and the City to ensure that families are accessing all services available to them.
16	**Agency / Group / Organization**	League of Women Voters
	Agency / Group / Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The League of Women's Voters provided a Housing Needs report that they prepared and observations about housing needs throughout Las Cruces.

17	**Agency / Group / Organization**	Amador Health Center (FKA St. Luke's Healthcare Clinic)
	Agency / Group / Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from Amador Health Center (FKA St. Luke's Health Care Clinic) were key informants providing information related to homeless health needs and programs available at the clinic. The agency coordinates services with other homeless providers and the city.
19	**Agency / Group / Organization**	Tierra del Sol Housing Corp
	Agency / Group / Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Tierra del Sol, as a nonprofit housing developer, provided insights into housing needs, the housing market, and development challenges in Las Cruces. Tierra del Sol coordinates with other housing and service providers and the City to construct new housing units.
20	**Agency / Group / Organization**	Precision Mortgage Group
	Agency / Group / Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Precision Mortgage Group was a key informant providing information related to the housing market and economic conditions in Las Cruces.

21	**Agency / Group / Organization**	Mesilla Valley Public Housing Authority
	Agency / Group / Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Mesilla Valley Public Housing Authority provided data related to residents, properties and waiting lists and needs for affordable housing in Las Cruces.
22	**Agency / Group / Organization**	Las Cruces Home Builders Association
	Agency / Group / Organization Type	Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from the Las Cruces Home Builders Association provided insights into the housing development market and challenges related to building housing in Las Cruces.
25	**Agency / Group / Organization**	Mesilla Valley Habitat for Humanity
	Agency / Group / Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat for Humanity staff were key informants to provide insights into the housing needs of residents, construction of housing units, and the development challenges in Las Cruces. Habitat coordinates with other housing and service agencies and the City to provide housing.
26	**Agency / Group / Organization**	City of Las Cruces
	Agency / Group / Organization Type	Housing Services - Elderly Persons Other government - Local

		Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically Homeless Homeless Needs - Families with Children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied Youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from many City departments in Las Cruces, including Planning, Public Works, Housing, Community Development, Senior Programs, Land Management, the City Council, Mayor's Office, and Metropolitan Planning Organization provided data, insights, programmatic information, and priorities for development of the Consolidated Plan.
27	**Agency / Group / Organization**	Mesilla Valley Court Appointed Special Advocates (CASA) Inc.
	Agency / Group / Organization Type	Services - Children Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Mesilla Valley CASA staff was a key informant providing information related to children in need and in the court system in Las Cruces.
28	**Agency / Group / Organization**	New Mexico CAFE
	Agency / Group / Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency / Group / Organization consulted and what are the anticipated	Staff was a key information related to the housing and service needs of the Spanish speaking community in Las Cruces. The agency has also worked to provide foreclosure

	outcomes of the consultation or areas for improved coordination?	prevention assistance in the past, are proponents of economic development and minimum wage increases in Las Cruces
29	**Agency / Group / Organization**	Enchanted Sun Realty
	Agency / Group / Organization Type	Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Enchanted Sun Realty provided information related to the homeownership market in Las Cruces and availability of land for development.
30	**Agency / Group / Organization**	Las Cruces Economic Development Office
	Agency / Group / Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency / Group / Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Las Cruces Economic Development Director was a key informant providing information and insights into the economy in Las Cruces and economic development needs.

Efforts were made to include all agency types. No specific agencies were excluded from this process.

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?
New Mexico Continuum of Care	NM Coalition to End Homelessness	The efforts to end homelessness including chronic homelessness overlap. Providing Affordable Housing to Homeless Persons and special needs populations also overlap

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City benefits from having a small group of established non-profit organizations specializing in serving homeless, special needs, and other low-income populations.

The City has worked diligently to foster and develop strong relationships with the organizations that provide housing and supportive services to low-income and special needs populations. City staff are accessible to housing and social service providers and continue to make the CDBG and HOME application processes straightforward and transparent. In recent years, the City has been very proactive in implementing policies and programs that remove barriers and support the provision of needed housing and services, such as the establishment of a land bank, an affordable housing trust fund, streamlining the development process and implementing fee waivers for affordable housing development. These efforts will continue during the five-year Consolidated Plan period.

PR-15 Citizen Participation

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

Input from a broad range of citizens and citizen groups were collected during the development of the Five-Year Consolidated Plan. The public was encouraged to participate through multiple modes, with outreach to 22,762 residents in low-income census tracts (in Spanish and English); Public Hearings and Meetings; submittal of written comments regarding the draft Five-Year Plan; and the City Council Public Hearing to adopt the plan. The Housing and Neighborhood Services Division notified the public about opportunities to participate in the process on the City website, through mailings (in English and Spanish) to 22,762 residents in low-income census tracts, through 39,000 utility mailouts, through publications in local newspapers, through 1,500 postcards at a local food pantry, through other non-profit and service providers, and additional means. Input from citizens and key informants was used along with data to determine high priority needs and five-year goals to meet needs.

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	Citizen Survey	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted / broad community	942 resident surveys were received and used as resident feedback for priorities. An online version of the survey was available on the City website and through outreach in English and Spanish.	The survey solicited comments and opinions about housing, community development, economic development, supportive services, and homelessness needs in Las Cruces. Respondents provided a wide range of opinions on multiple issues. Respondents ranked top needs as Economic development, Mental Health Services, Domestic Violence Shelters, and Education and Job Training as their top needs. For a more comprehensive list, including needs as ranked by discrete ethnic groups, see	For a full list of survey comments, see Appendix.	

				Community Survey section on Appendix.		

2	Public Meetings	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted / broad community Residents of Public and Assisted Housing	The City of Las Cruces held 8 public meetings to gather input into high priority needs for housing, public services, economic development, and infrastructure. Invitations were sent to 22,762 residents in low-income census tracts in English and Spanish, the meetings were advertised through the local newspaper, on the City website and to partner organizations and grantees. Due to the COVID-19 pandemic, meetings were held online via Zoom during the day and in the evening, with Spanish translation on-hand for all gatherings. 33 residents attended and provided input into high priority needs and goals after a presentation of data included in this plan. Please see the attachments to the Consolidated Plan for a summary of input.	Attendees were concerned about homeless assistance, supportive services to vulnerable households, increasing the supply of affordable rental and for-sale housing, and creating an ecosystem where the City better works with community partners to facilitate holistic growth for all.	None	

3	Key Informant Interviews	Representatives of service agencies, housing providers, government programs and the business community	56 key informants gave input related to housing needs, public service and special needs population needs, homeless needs, the need for jobs and economic activity programs, and infrastructure needs.	Data, comments, priorities and information gathered from this input was used to develop various sections of the Consolidated Plan and is reflected in Consolidated Plan narratives.		

4	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted / broad community	[Update after public comment period]	[Update after public comment period]		
5	City Website	Non-targeted / broad community	The City of Las Cruces posted notices of all public meetings and draft documents on the City website	[Update after public comment period]		http://www.las-cruces.org/en/departments/community-development/housing-and-family-services/2016-2020-consolidated-plan

NA-05 Overview

Needs Assessment Overview

The needs assessment analyzes a variety of housing, homeless, community development, and non-homeless special needs through an examination of the 2019 American Community Survey (ACS) and 2013-2017 CHAS data, which was created by the U.S. Census Bureau and the U.S. Department of Housing and Urban Development. This data quantifies housing problems, such as overcrowding and its cost burdens, and measures the magnitude of special needs populations, such as the elderly, frail elderly, and persons with HIV/AIDS. As shown in the following analysis, cost burdened (paying more than 30 percent of household income on housing expenses) and extreme cost burdened (paying more than 50 percent of household income on housing expenses) has a considerable impact on households in Las Cruces, particularly in lower income households. Measures of housing condition (lack of complete kitchen or plumbing facilities) do not provide a reliable measure of condition; although it represents the best, easily accessible data on the topic. Other needs are represented through various census and state data sources.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Between the year 2010 and 2019, the population in Las Cruces grew by 5.3 percent. Median incomes rose 24.6 percent during this time.

Demographics	Base Year: 2010	Most Recent Year: 2019	% Change
Population	98,239	103,436	↑5.3%
Households	38,430	40,185	↑4.5%
Median Income	$36,202	$45,130	↑24.6%

Table 5

SOURCE: American Community Survey, 2019 1-Year Estimates

The population of Las Cruces is expected to increase over the next five years, though the rate of change is not expected to be as great (3.9%) as it was during the decade between 2010 and 2019 (5.3%). Income growth from 2010 to 2019 in Las Cruces (24.6%) was greater than the New Mexico rate (10.9%) but was not as robust as the national average (31%).

Percent Population by Age, 2000 - 2019

Age	2010	2019	Percent Change '10 - '19
0 - 17	23.0%	24.1%	+4.7%
18 - 24	10.9%	10.3%	-5.5%
25 - 44	25.1%	24.6%	-1.9%
45 - 64	23.4%	21.0%	-10.2%
65 - 84	11.5%	14.8%	+28.7%
85 and over	1.7%	1.4%	-17.6%

Source: American Community Survey 1-Year Estimates, 2010, 2019

The fastest growing age group in Las Cruces is the senior population. From 2010 to 2019, the age group 65 to 84 years old increased by 28.7 percent while the 85 and older age group decreased 17.6 percent for a net increase of 11.1 percent. There is a net decrease in age groups from age 18 through 64 indicating that young adults are leaving the community for higher education and then seeking employment elsewhere in the country where they can potentially earn more money. They may eventually “boomerang” back for their retirement years.

American Community Survey data below shows that 80.6 percent of all Las Cruces residents identify their race as white, and 58.5 percent consider themselves Hispanic/Latino. The percent of population who identify themselves as non-white is slightly higher than that of Dona Ana County (79%), though the percentage of Hispanic/Latino population is lower than the Dona Ana County average (68%).

Population by Race, 2019

Race	Dona Ana County		Las Cruces	
	Total Population	% by Race	Total Population	% by Race
White	174,131	79.80%	83,391	80.60%
Black/African American	3,881	1.80%	2,945	2.80%
American Indian and Alaska Native	2,930	1.30%	1,916	1.90%
Asian	3,135	1.40%	2,155	2.10%
Native Hawaiian and Other Pacific Islander	229	0.10%	229	0.20%
Some other race alone	29,566	13.60%	9,671	9.30%
Two or more races	4,323	2.00%	3,129	3.00%
Total	218,195		103,436	

Source: 2019 American Community Survey 1-Year Estimates

The fastest growing racial groups in Las Cruces from 2010-2019 were Asian (1.4% to 2.1%) and Black/African American (1.8% to 2.8%). Both populations nearly doubled in size. There was a decline in residents who identify as White (89.9% to 80.6%). Hispanic or Latino ethnicity remained similar (58.3% to 58.5%).

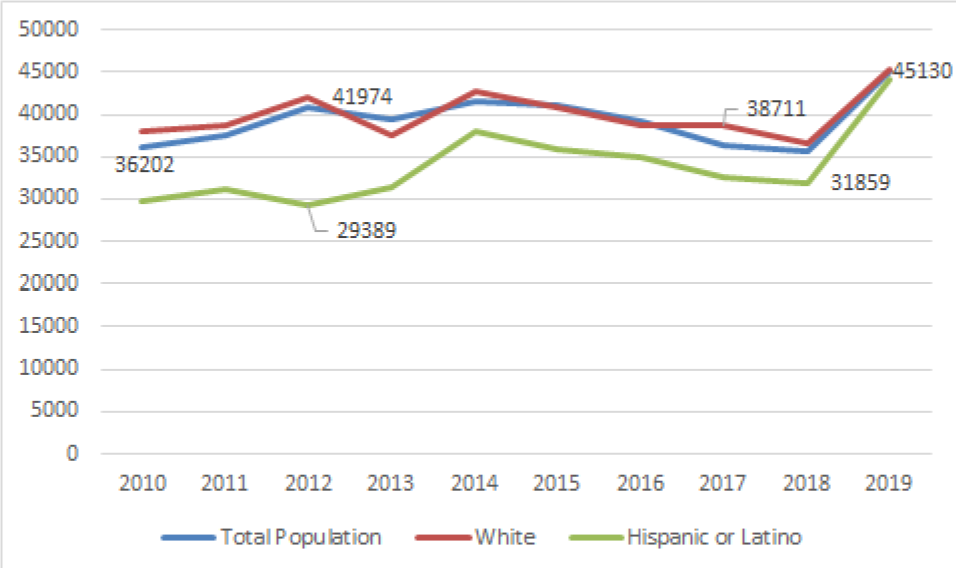
Population by Ethnicity, 2019

Ethnicity	Dona Ana County		Las Cruces	
	Total Population	% by Ethnicity	Total Population	% by Ethnicity
Hispanic or Latino	150,033	68.80%	60,471	58.50%
Mexican	133,073	61.0%%	ND	
Puerto Rican	554	0.30%	ND	
Cuban	810	0.40%	ND	
Other Hispanic or Latino	15,596	7.10%	ND	

Source: 2019 American Community Survey, 1-Year Estimates

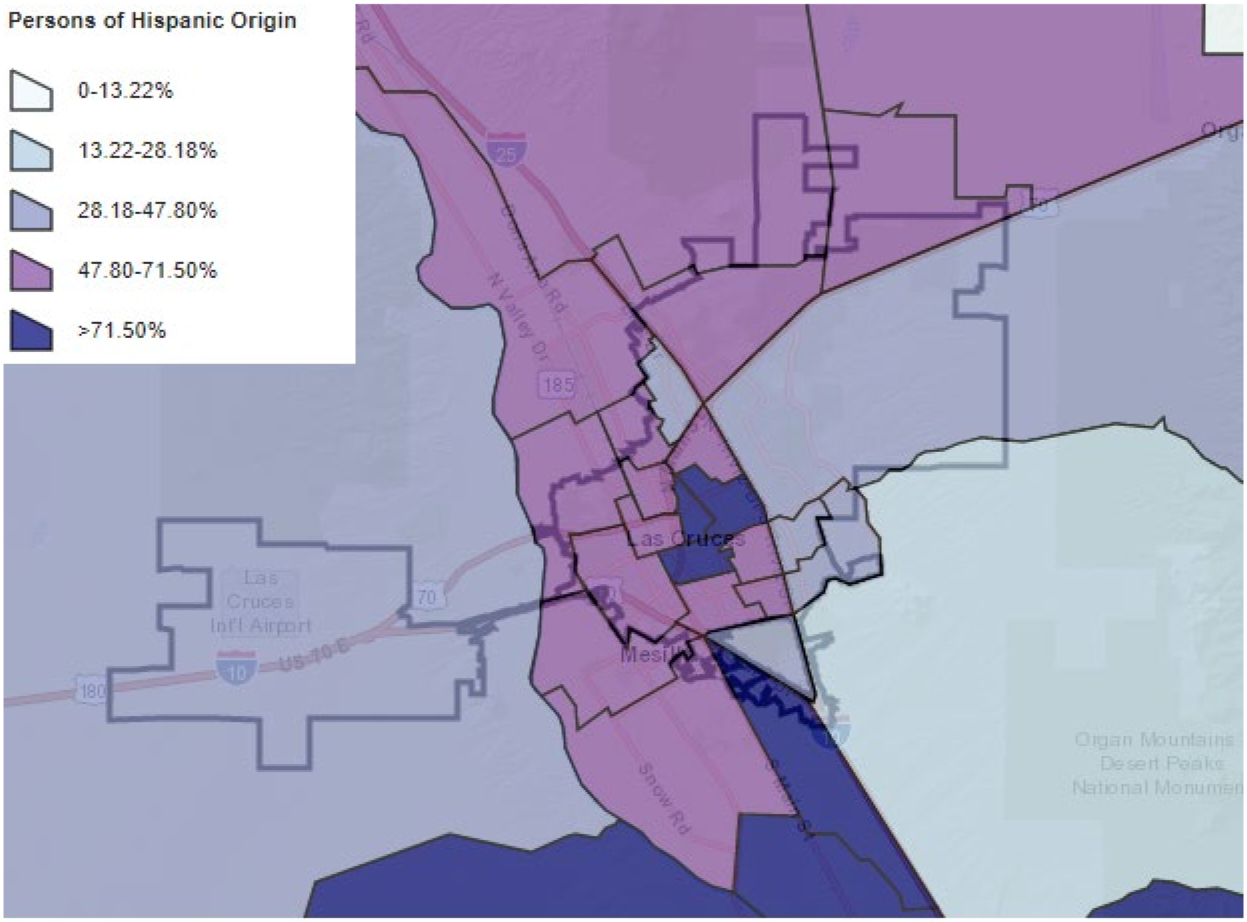
Median household incomes have risen 24.6 percent in Las Cruces since 2010. Incomes have increased especially among Hispanic or Latino residents. In 2010, the median income for a Hispanic or Latino household was $29,769. As of 2019, the median household income for a Hispanic or Latino family is $44,161, an increase of 48%. The median household income in White households increased 19% over the same time period. Overall incomes dipped slightly between 2014 and 2017, then rose quickly from 2018 to 2019.

Median Household Income (USD), 2010-2019



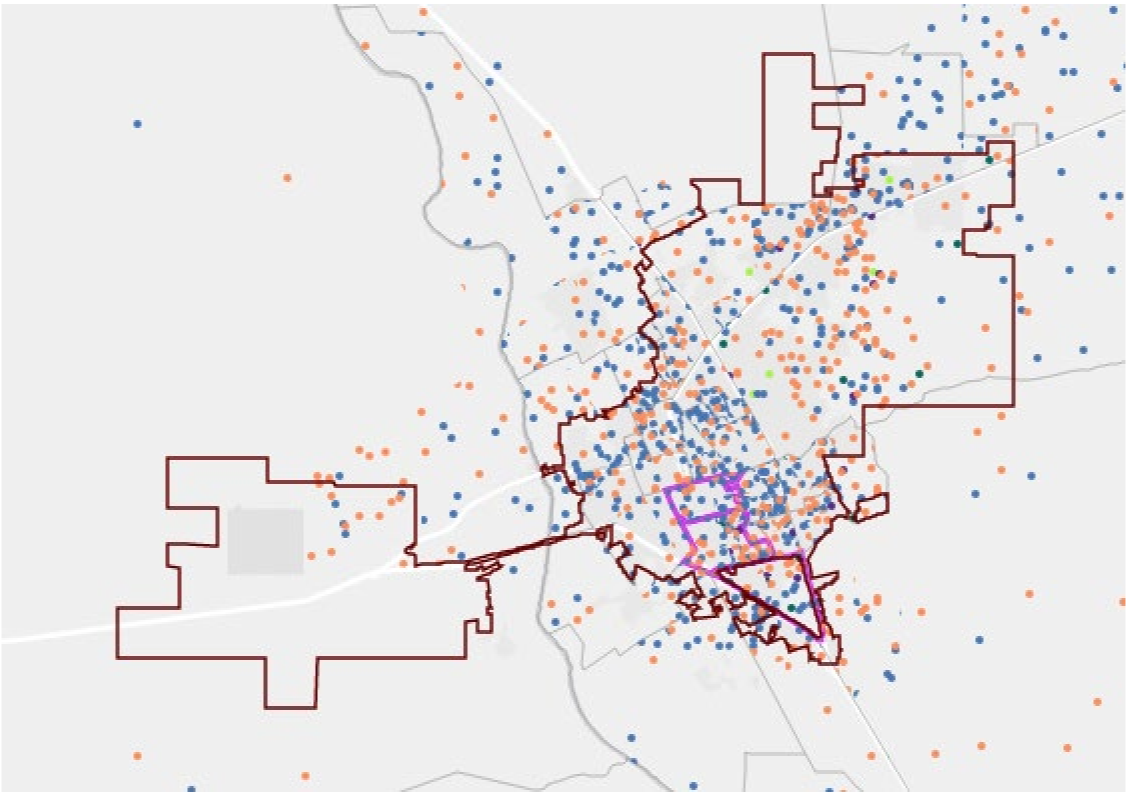
SOURCE: ACS, 2010-2019

The following map shows the concentrations of Hispanic households in Las Cruces. City-wide, 51 percent of households are Hispanic or Latino. It is not surprising, then, to see that in 61.5 percent of census tracts within the City (16 of 26), more than 50 percent of residents are Hispanic or Latino. Las Cruces considers there to be a "concentration" of racial or ethnic minorities if there is more than 50 percent of one group in a census group. This is also consistent with the definition found in the new AFFH analysis of poverty concentrations for racially/ethnically concentrated areas of poverty (R/ECAPs). Areas shaded in purple or dark purple indicate greater than 50% percent Hispanic household concentration.



Source: HUD CPD Maps

While many census tracts have more than 50 percent Hispanic population, there are just two that meet the R/ECAP threshold of 50 percent non-white and having a poverty rate of 40 percent or more, or three times or more the average tract poverty rate for the Las Cruces MSA. HUD has recently developed a data and mapping tool that identifies these "R/ECAP" census tracts based on 2019 data. In Las Cruces, there are two R/ECAP tracts – 6.00 and 9.00. Tract 10.00 is also a R/ECAP tract but is outside the City limits and owned by New Mexico State University.



SOURCE: HUD AFFHT Mapping System R/ECAP Census Tract Map

According to the HUD AFFHT data system, 77 percent of households in these tracts were Hispanic in 2019, and the median household size was 2.5 persons. Tracts 6.00 and 9.00 are near downtown, and in older Las Cruces neighborhoods. The American Community Survey data shows that in tract 6.00, 77.1 percent are Hispanic/Latino, and in tract 9.00, 76.9 percent are Hispanic/Latino.

The following table provides information about persons in poverty living in Las Cruces from 2010–2019. The poverty rate, or percent of persons in poverty, was 21.3 percent of the total population in 2010 and increased slightly to 22.2 percent in 2019. However, there was variance on a year over year basis. From 2014 to 2017, poverty rates dropped, then rose quickly in 2018 and 2019, bringing the average back near where it began in 2010. The number of seniors aged 65 and older who are living in poverty rose from 927 to 2,804, an increase of 6 percent.

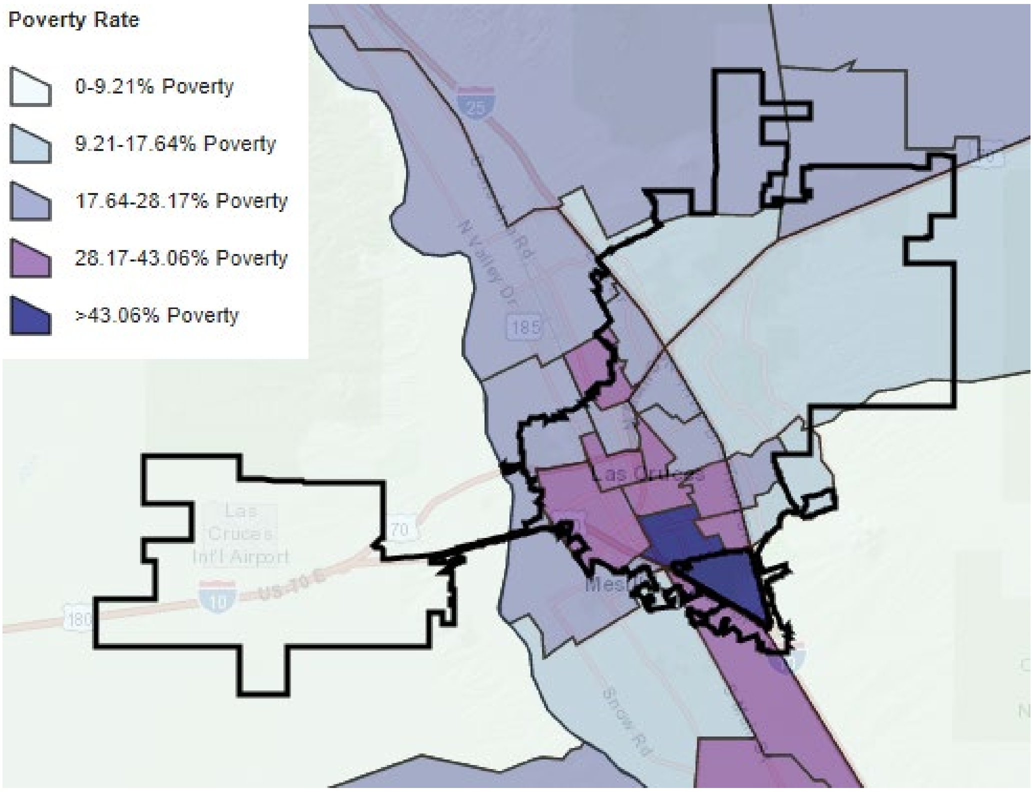
The groups of people who saw a slight decline in poverty rate were children and single Female Parents, (52.5% to 50.7.%).

Poverty in Las Cruces, 2010 – 2019

Measure	2010	2019
Persons in Poverty	20,140	22,561
Poverty Rate	21.30%	22.20%
Children in Poverty	5,679	4,953
Poverty Rate	25.63%	21.87%
Over 65 in Poverty	927	2,084
Poverty Rate	7.32%	13.36%
Single Female Parents in Poverty	1,885	1,859
Poverty Rate	52.51%	50.70%

SOURCE: American Community Survey, 2010, 2019 1-Year Estimates

The following map shows census tract concentrations of poverty. Areas with concentrations of 40 percent or more households in poverty tend to be in older, central neighborhoods near downtown, and near the university campus.



Source: HUD CPD Maps

Households have grown at a slightly lower rate (4.5%) than the total population (5.3%) in Las Cruces, indicating that young Las Cruces residents may no longer be moving out of larger family households to form their own smaller household or seniors may be moving in with family.

Total Households, Las Cruces, 2010 – 2019

	Dona Ana County	Las Cruces
2010	75,532	38,430
2019	79,094	40,185
Percent Change	4.70%	4.50%

Source: American Community Survey, 2010, 2019 1-Year Estimates

HUD provides the following table showing the estimated number of households by household type and Area Median Income (AMI) level in 2017. The highest concentrations of any household type are in the greater than 100% AMI income range. Small family households have the highest number of households in all income ranges.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households*	5,900	4,370	6,615	3,245	19,680
Small Family Households*	1,980	1,720	2,950	1,520	13,150
Large Family Households*	360	400	490	300	1,370
Household contains at least one person 62-74 years of age	660	795	1,135	420	5,105
Household contains at least one person age 75 or older	355	620	790	345	2,435
Households with one or more children 6 years old or younger *	1,095	850	1,255	535	2,960

Table 6

SOURCE: 2013-2017 CHAS

* The highest income category for these family types is >80% HAMFI

The following table quantifies the percent of households in Las Cruces by tenure (renter vs. owner) and by percent of HUD median income in 2019. The median income for renters in Las Cruces is $22,185. The median income for homeowners in Las Cruces is 300 percent greater - $66,682. This large income disparity between renters and owners highlights the challenge many current renters face as they navigate requirements to find affordable rental units and/or become homeowners themselves.

Households by Tenure and Income, Las Cruces, 2019

	Renter Households	Owner Households	Total Households
Less than $10,000	20.5%	3.9%	11.6%
$10,000 - $14,999	8.7%	3.6%	6.0%
$15,000 - $24,999	9.2%	1.5%	5.1%
$25,000 - $34,999	17.2%	2.9%	9.6%
$35,000 - $49,999	7.1%	10.1%	8.7%
$50,000 - $74,999	8.5%	15.8%	12.4%
$75,000 - $99,999	16.3%	20.1%	18.3%
$100,000 - $149,999	7.2%	18.4%	13.2%
$150,000+	5.1%	23.8%	15.1%
Median Income	$22,185	$66,682	$45,130

Source: 2019 American Community Survey, 1-Year Estimates

HUD provides the following tables which show households with Housing Problems by tenure and income range. These tables are created using US Census Bureau 2013-2017 American Community Survey (ACS) data. Housing problems are defined by HUD for the Consolidated Plan as:

1. Housing unit lacks complete kitchen facilities
2. Housing unit lacks complete plumbing facilities
3. Overcrowding (1.01–1.5 persons per room)
4. Severe overcrowding (greater than 1.5 persons per room)
5. Cost burden (households paying between 30% and 50% of their income for housing)
6. Severe cost burden (household pays 50% or more of their income for housing)

In Las Cruces, HUD estimates there were 200 rental units and 75 owner occupied units without complete plumbing or kitchen facilities in 2019. There were 495 severely overcrowded households in Las Cruces, 280 renters and 215 owners, respectively.

The largest housing problems experienced in Las Cruces are cost burden and severe cost burden, with 17,195 households experiencing some form of cost burden. Renter households are more likely to be both severely cost burdened, and cost burdened than owners. CHAS Data shows there were 2,520 renter households at 0–30% AMI that were severely cost burdened. 1,595 renters earning 30–50% of the AMI were severely cost burdened. There were also 6,710 owners earning below 100% AMI who are cost burdened. and 3,435 owner households who were severely cost burdened.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	30	40	90	40	200	30	30	15	0	75
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	115	105	20	40	280	95	30	50	40	215
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	315	265	260	195	1,035	45	40	110	65	260
Housing cost burden greater than 50% of income (and none of the above problems)	2,520	1,595	875	30	5,020	1,220	1,080	920	215	3,435
Housing cost burden greater than 30% of income (and none of the	2,730	2,725	3,955	1,075	10,485	1,425	1,560	2,500	1,225	6,710

above problems)										
Zero/negative Income (and none of the above problems)	500	0	0	0	500	430	0	0	0	430

Table 7 – Housing Problems Table
Data Source: 2013-2017 CHAS

The next HUD-provided table shows the number of households with one of the four housing problems, or none of the four housing problems, by tenure and AMI income range in 2017. There are more renters with housing problems than owners. Housing problems are experienced by many more extremely low (0–30% AMI) and low-income (31–50% AMI) renters and owners than by moderate income households or those with incomes above 80% AMI.

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					**Owner**				
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,280	2,600	2,575	445	8,900	1,150	985	1,125	520	3,780
Having none of four housing problems	385	390	1,300	1,350	3,425	95	395	1,615	925	3,030
Household has negative income, but none of the other housing problems	720	0	0	0	720	270	0	0	0	270

Table 8 – Housing Problems 2

Data Source: 2013-2017 CHAS

HUD data shows that “Other” households have the highest number of cost burdened households in Las Cruces. “Small related” also have high numbers of cost burdened households.

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**Total**
NUMBER OF HOUSEHOLDS								
Small Related	1,195	895	685	2,775	260	345	560	1,165
Large Related	235	195	170	600	35	90	100	225
Elderly	0	24	130	154	40	195	90	325
Other	1,810	1,440	1,370	4,620	780	325	350	1,455
Total need by income	3,240	2,554	2,355	8,149	1,115	955	1,100	3,170

Table 9 – Cost Burden > 30%
Data Source: 2013-2017 CHAS

The highest number of severely cost-burdened households are renters with incomes at 0–30% AMI. Most are "other" households, and many are small, related households. The highest number of severely cost-burdened owner households are those at 31–50% AMI.

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**Total**
NUMBER OF HOUSEHOLDS								
Small Related	1,085	425	35	1,545	240	280	210	730
Large Related	210	35	0	245	35	15	15	65
Elderly	0	4	15	19	25	70	0	95
Other	1,630	860	530	3,020	580	195	55	830
Total need by income	2,925	1,324	580	4,828	880	560	280	1,720

Table 10 – Cost Burden > 50%
Data Source: 2013-2017 CHAS

Overcrowding is also most prevalent in renter households with lower incomes, especially in single family households. Overcrowding often occurs when a low-income household must rent or own a home smaller than they need because the price is lower than larger units.

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	155	195	145	60	555	35	15	35	55	140
Multiple, unrelated family households	45	10	0	0	55	0	15	0	0	15
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	200	205	145	60	610	35	30	35	55	155

Table 11 – Crowding Information – 1/2
Data Source: 2013-2017 CHAS

HUD requires grantees to estimate the number of households with children living in the household by tenure and AMI income range. This data has been provided through the HUD CPD Maps data system. There are 2,570 renter households and 630 owner households at or below 80% AMI with children living in the household in Las Cruces. Many of these households may also be cost burdened or overcrowded due to rising housing prices.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	1,015	745	810	2,570	80	105	445	630

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

There are 12,141 single person households (30.2%) in Las Cruces. Single persons most in need of housing assistance are persons with disabilities, homeless individuals, persons with substance abuse issues, persons with criminal records, and extremely low-income individuals earning 0 – 30% of the AMI. These households have difficulties finding an affordable place to live, and often can't find the funds needed to pay application fees and deposits once units are found. Many also need supported housing, either with case management and healthcare for chronic health and mental health issues, or with assistance with activities of daily living.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Households with disabled household members will be discussed in further detail in NA-40, Non-Homeless Special Needs Assessment. The following overviews disability in Las Cruces, where there are 15,143 individuals living with a disability.

- 7,517 households with a hearing or visually impaired household member
- 7,133 households with a member who has an ambulatory limitation
- 6,036 households with a member who has a cognitive limitation
- 9,463 households with a member who has a self-care or independent living limitation

The most common assistance needed for households with a disabled household member are housing accessibility modifications, access to public transportation, and rent restrictions to reduce household housing costs.

The New Mexico Coalition of Sexual Assault Programs (NMCSAP) tracks Domestic Violence trends by New Mexico county. In Las Cruces in 2019, there were 1,483 Domestic Violence Reports filed by Las Cruces and State Police. La Casa, the Las Cruces domestic violence shelter, recorded 879 crisis hotline calls. However, those numbers may not reflect the scope of domestic violence, dating violence, and stalking. The NMCSAP recorded 14 reported cases of stalking in Las Cruces in 2019 but estimates 5,098 cases occurring. Research has shown that domestic violence and child abuse has risen during the 2020 COVID-19 pandemic due to lockdowns and stay-at-home orders. Many of these cases are likely to go unreported.

What are the most common housing problems?

The most common housing problems experienced by Las Cruces households are cost burden and severe cost burden. The combination of low median incomes, and home and rental prices continued rise, have left very little affordable housing options for Las Cruces residents.

Are any populations/household types more affected than others by these problems?

The highest number of severely cost-burdened households are renters with incomes at 0–30% AMI. Most are "other" households, and many are small, related households. The highest number of severely cost-burdened owner households are those at 31–50% AM

Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Households with severe cost burden and those with more than one family living in a unit are most in danger of becoming unsheltered and homeless. This is especially true for extremely low-income households. In 2017, there were a total of 3,240 extremely low-income renter households who were cost burdened (spending more than 30% of income on housing expenses) and 2,925 extremely low-income renter households who were severely cost burdened (spending more than 50% of income on housing expenses) in Las Cruces. While some low-income students are included in these numbers, not all students respond to the census where they reside for school, and not all are low-income. Many severely cost-burdened households are low and very low-income families, elderly, and individuals. Las Cruces has an average rental vacancy rate (7.5%), and most price restricted rental properties have waiting lists, as does the Las Cruces Housing Authority Housing Choice program. Households who fall behind in rent payments will find it difficult to find a less costly rental unit within Las Cruces.

Homeless providers and housing providers interviewed during the preparation of the Consolidated Plan indicated the biggest hurdle for their clients is finding an affordable rental when they are ready to leave a shelter or homeless program. This is also true for families and individuals with bad credit or a criminal record. Households will struggle to avoid the homeless cycle without housing that costs 30% or less of their income.

Formerly homeless families and individuals nearing the termination of rapid re-housing assistance need extended case management or supportive services to ensure once financial assistance is no longer needed that they will have the support, resources, and skills required to retain their housing permanently.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City of Las Cruces does not provide estimates of any specific at-risk populations.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing cost and housing availability are the two housing characteristics most linked to housing instability in Las Cruces. The Las Cruces rental housing market and the gap between low wages and increasing rent costs is causing many households to be priced out of the rental market. Additionally, the quality of some of the more affordable rental units is not good. Many community leaders who specialize in affordable housing in Las Cruces also identify mental and behavioral health issues, a lack of financial literacy, and long wait lists of individuals trying to find and secure affordable rental units or rental assistance as contributing factors to housing instability.

Discussion

Please refer to the MA-15 Cost of Housing section of the Consolidated Plan to read more about housing costs, and the gap in prices and unit availability for households in Las Cruces.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need.

Introduction

A disproportionately greater need exists when the members of a racial or ethnic group at any income level experience housing problems at a greater rate (10 percent points or more) than the income level. Tables 13 through 16 show the number of households experiencing housing problems by income level and race/ethnicity.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,430	480	990
White	1,490	190	560
Black / African American	35	0	0
Asian	55	0	20
American Indian, Alaska Native	80	0	0
Pacific Islander	0	0	0
Hispanic	2,560	240	410

Table 13 - Disproportionally Greater Need 0 - 30% AMI
Data Source: 2013-2017 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,585	785	0
White	1,245	290	0
Black / African American	185	10	0
Asian	65	0	0
American Indian, Alaska Native	40	15	0
Pacific Islander	0	0	0
Hispanic	2,025	475	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,700	2,915	0
White	1,100	885	0
Black / African American	50	20	0
Asian	40	10	0
American Indian, Alaska Native	0	100	0
Pacific Islander	0	0	0
Hispanic	2,445	1,880	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2013-2017 CHAS

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	965	2,275	0
White	405	675	0
Black / African American	35	105	0
Asian	65	45	0
American Indian, Alaska Native	10	10	0
Pacific Islander	0	0	0
Hispanic	440	1,445	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2013-2017 CHAS

Discussion

Extremely Low Income - 0 to 30% AMI

An estimated 75.1 percent of all extremely low-income households in the city had at least one housing problem. 66.5 percent of White households, 100 percent of Black/African American households, 73.3 percent of Asian households, 100 percent of American Indian / Alaska Native households, zero percent of Pacific Islander households, and 79.8 percent of Hispanic or Latino households in this income range experienced housing problems. In the extremely low-income group, Black/African American, American Indian/Alaska Native and Hispanic or Latino households experienced the highest rates of housing problem(s).

Very Low Income - 30 to 50% AMI

An estimated 82.0 percent of all very low-income households had at least one housing problem. 81.1 percent of White households, 94.8 percent of Black/African American households, 100 percent of Asian households, 72.7 of American Indian/Alaska Native households, zero Pacific Islander households, and 81 percent of Hispanic households in this income range experienced housing problems. Black/African American and Asian households experienced the highest rates of housing problem(s) in this very low-income group, with White and Hispanic or Latino households experiencing nearly the same rates.

Low Income - 50 to 80% AMI

An estimated 55.9 percent of low-income households had at least one housing problem. 55.4 percent of White households, 71.4 percent of Black/African American households, 80 percent of Asian households, zero American Indian/Alaska Native households, zero Pacific Islander households, and 56.5 percent of Hispanic households in this income range experienced housing problems. In the low-income category, Black/African American and Asian households had a disproportionately greater need. Hispanic or Latino households experienced housing problems at a slightly higher rate than white households.

Moderate Income - 80 to 100% AMI

An estimated 29.8 percent of all moderate-income households had at least one housing problem. 37.5 percent of White households, 25.0 percent of Black/African American households, 59.1 percent of Asian households, 50.0 percent of American Indian/Alaska Native households, zero Pacific Islander households, and 23.3 percent of Hispanic households in this income range experienced housing problems. American Indian/Alaska Native households (50%) experienced housing problems at the highest rate in this moderate-income group.

Summary

Housing problems in Las Cruces are experienced at a higher rate by households with lower incomes. However, across income ranges, housing problems disproportionately affect non-White, non-Hispanic or

Latino households. Black/African American and American Indian/Alaska Native households experience housing problems at a rate unequal to their overall representation in the Las Cruces population.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need.

Introduction

Severe housing problems in Las Cruces are experienced at a higher rate by households with lower incomes. However, as incomes increase, and overall severe housing problems decrease, severe housing problems continue to affect Black/African American households at a much higher rate than other household races.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,880	1,030	990
White	1,320	360	560
Black / African American	10	25	0
Asian	55	0	20
American Indian, Alaska Native	80	0	0
Pacific Islander	0	0	0
Hispanic	2,210	590	410

Table 17 – Severe Housing Problems 0 - 30% AMI
Data Source: 2013-2017 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,165	2,205	0
White	835	700	0
Black / African American	125	70	0
Asian	45	25	0
American Indian, Alaska Native	40	15	0
Pacific Islander	0	0	0
Hispanic	1,110	1,405	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,215	5,400	0
White	320	1,670	0
Black / African American	25	45	0
Asian	0	50	0
American Indian, Alaska Native	0	100	0
Pacific Islander	0	0	0
Hispanic	870	3,455	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017CHAS

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	150	3,095	0
White	60	1,025	0
Black / African American	35	105	0
Asian	10	100	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	45	1,840	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

DISCUSSION

Extremely Low Income - 0 to 30% AMI

An estimated 65.8 percent of all extremely low-income households in the city had at least one severe housing problem. 58.9 percent of White households, 28.5 percent of Black/African American households, 73.3 percent of Asian households, 100 percent of American Indian /Alaska Native households, zero percent of Pacific Islander households, and 68.9 percent of Hispanic or Latino households in this income range experienced severe housing problems. In the extremely low-income group, Asian, American Indian/Alaska Native, and Hispanic or Latino households experienced the highest rates of severe housing problem(s).

Very Low Income - 30 to 50% AMI

An estimated 49.5 percent of all very low-income households had at least one severe housing problem. 54.4 percent of White households, 64.1 percent of Black/African American households, 64.3 percent of Asian households, 72.7 of American Indian/Alaska Native households, zero Pacific Islander households, and 44 percent of Hispanic households in this income range experienced severe housing problems. Black/African American, Asian, and American Indian/Alaska Native households experienced the highest rates of severe housing problem(s) in this very low-income group.

Low Income - 50 to 80% AMI

An estimated 18.4 percent of low-income households had at least one severe housing problem. 16.1 percent of White households, 35.7 percent of Black/African American households, zero Asian households, zero American Indian/Alaska Native households, zero Pacific Islander households, and 20.1 percent of Hispanic households in this income range experienced severe housing problems. In the low-income category, Black/African American households had a disproportionately greater need.

Moderate Income - 80 to 100% AMI

An estimated 4.6 percent of all moderate-income households had at least one severe housing problem. 5.5 percent of White households, 25.0 percent of Black/African American households, 9.1 percent of Asian households, zero American Indian/Alaska Native households, zero Pacific Islander households, and 2.4 percent of Hispanic households in this income range experienced severe housing problems. Black/African American households experienced a disproportionately greater rate of severe housing problems than other household races.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need.

Introduction:

Despite making up just 2.1 and 1.1 percent of the population respectively, Black/African American and American Indian/Alaska Native households make up 30.1 and 7.7 percent of severely cost burdened households.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	25,365	6,730	6,700	1,005
White	11,595	2,360	2,385	560
Black / African American	727	10	165	0
Asian	280	185	100	20
American Indian, Alaska Native	290	10	105	15
Pacific Islander	0	0	0	0
Hispanic	12,180	3,965	3,710	410

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Yes, households in the 0 – 30% AMI range are more likely to have a disproportionate housing need than in other ranges. Black/African American, Asian, and Native American/Alaska Native households in this income range have disproportionate housing needs

If they have needs not identified above, what are those needs?

These households most likely are overcrowded. There are few households that lack complete kitchen or plumbing facilities in Las Cruces. Black/African American and American Indian/Alaska Native households experience extreme housing cost burden at an unequal rate compared to other households.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

No, there are no concentrations of either Black/African American, Asian or Native American/Alaska Native households in any census tracts in Las Cruces.

NA-35 Public Housing – 91.205(b)

Introduction

The Mesilla Valley Public Housing Authority (MVPHA) operates a variety of programs for residents of Las Cruces and throughout Dona Ana County, including Section 8 choice vouchers, public housing, and elderly price restricted rental units. The Housing Authority administers 1,227 housing choice vouchers within the City of Las Cruces. They also own 248 public housing units located in Las Cruces.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	0	236	1,227	0	1,048	53	33	93

Table 22 - Public Housing by Program Type
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**
Data Source: Mesilla Valley Housing Authority

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	77	334	0			
# of Disabled Families	0	0	113	502	0	464	29	9

# of Families requesting accessibility features	0	0	1	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type
Data Source: Mesilla Valley Housing Authority

The Mesilla Valley Housing Authority has provided information from the agency's own resident characteristics report. Public Housing tenants served by the Housing Authority are 46 percent households with children, 32 percent elderly and 44 percent households with a disabled household member. Forty two percent (42%) of public housing and 43 percent of voucher households are female headed households with children.

Distribution of Family Type

	Public Housing	Vouchers
Elderly, No Children, Non-Disabled	8%	9%
Elderly, with Children, Non-Disabled	1%	0%
Non-Elderly, No Children, Non-Disabled	6%	10%
Non-Elderly, with Children, Non-Disabled	39%	39%
Elderly, No Children, Disabled	22%	15%
Elderly, with Children, Disabled	1%	0%
Non-Elderly, No Children, Disabled	16%	19%
Non-Elderly, with Children, Disabled	5%	7%
Female Headed Household with Children	42%	43%

Source: Mesilla Valley Public Housing Authority

Children make up 52 percent of public housing unit tenants and 47 percent of voucher unit tenants. Elderly persons age 62 and over make up 13% of Public Housing residents and 12% of Voucher tenants.

Age of Residents

	Public Housing	Vouchers
0 - 5	15%	14%
0 to 17	37%	33%
18 - 50	30%	32%
51 - 61	6%	10%
62 - 82	10%	11%
83+	3%	1%

Source: Mesilla Valley Public Housing Authority

Table 25 (Below) – Race of Public Housing Residents by Program Type

Nearly 75% (74.0%) of clients served by the Housing Authority identify as Hispanic or Latino.

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled
White	0	0	231	1,149	0	985	48	27	89
Black/African American	0	0	5	73	0	59	5	5	4
Asian	0	0	0	3	0	2	0	1	0
American Indian/Alaska Native	0	0	0	2	0	2	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

Ethnicity of Residents

Program Type									
Ethnicity	**Certificate**	**Mod-Rehab**	**Public Housing**	**Vouchers**					
				Total	**Project - based**	**Tenant - based**	**Special Purpose Voucher**		
							Veterans Affairs Supportive Housing	**Family Unification Program**	**Disabled***
Hispanic	0	0	189	911	0	804	17	21	60
Not Hispanic	0	0	47	320	0	244	36	12	33

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

While 38 percent of Public Housing tenants and 39 percent of voucher holders have been with their programs for five or more years, most tenants have either lived in their Public Housing unit or used their Section 8 Voucher for less than five years. Approximately one third (29%) of Public Housing residents have been in their units for less than a year.

Length of Stay

	Public Housing	Vouchers
Less than 1 Year	29%	13%
1 - 2 Years	11%	11%
2 - 5 Years	22%	37%
5 - 10 Years	19%	16%
10 - 20 Years	11%	18%
Over 20 Years	8%	5%

Source: Mesilla Valley Public Housing Authority

Nearly 7 out of 10 (68%) of public housing residents make 30% of the AMI or less, and just over a quarter of Voucher holders have incomes in this range. The majority of households assisted through these programs have incomes at 50% AMI or less.

Tenant Incomes

	Public Housing	Vouchers
0 - 30% AMI	68%	26.0%
31 - 50% AMI	22%	9.0%
51 - 80% AMI	10%	1.0%
81% and above	0%	0.0%
$0	7%	7%
$1 - $5,000	14%	12%
$5,001 - $10,000	40%	35%
$10,001 - $15,000	22%	22%
$15,001 - $20,000	7%	13%
$20,001 - $25,000	6%	6%
Above $25,000	6%	4%

Source: Mesilla Valley Public Housing Authority

One third of all Housing Authority residents have some income from working. More than half have income from social security, disability income, or pensions.

Source of Tenant Income

	Public Housing	Vouchers
With any Wages	33%	38%
With any TANF	85%	72%
With any SSI/SS/Pension	53%	52%
With other income	12%	19%
No income	1%	0%

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Housing Authority does not keep waiting list demographics of those waiting for accessible units. However, the current tenant profiles show that many residents are disabled or rely upon disability income. It can be assumed that many of these tenants need accessible units or accessibility features in their units.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate needs of Public Housing and Choice Voucher residents are to continue having a rent subsidized housing unit. Many low-income residents of Las Cruces also note that finding employment at a livable wage is a challenge.

How do these needs compare to the housing needs of the population at large?

These needs are the same as for other low, very low and extremely low-income residents of Las Cruces. However, it is important to note that the long wait list indicates that there is a need for additional public housing and landlords who accept housing vouchers in Las Cruces.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Continuum of Care (CoC) is the coordinated approach that addresses physical, economic, and social needs of the homeless population. Services organized within the Continuum of Care include emergency shelter, transitional and permanent housing, and supportive services. The New Mexico Coalition to End Homelessness (NMCEH), is the leader of this process. NMCEH convenes, manages, and leads the Balance of State Continuum of Care Coalition. The Mesilla Valley Community of Hope is the local lead in providing an array of services for the homeless population in Las Cruces.

There were 73 chronically homeless individuals in shelter at the time of the 2019 PIT count and 78 unsheltered chronically homeless persons. Of chronically homeless persons, 29 were living as a family, 67 were by themselves. The total number of homeless individuals was 497, highlighting the large portion of individuals experiencing homelessness who are recently homeless, or in and out of housing. Many of these individuals are exiting hospitals, the judicial system, or other transitional housing situations, and often have no quality next step options. Key stakeholders emphasized the need for increased supportive and permanent housing options in Las Cruces.

Homelessness in Las Cruces affects a variety of populations and differs from many other parts of the country. In urban areas, cars and vacant buildings may be utilized by some people experiencing homelessness. In New Mexico, people who are homeless often camp out in open areas that may be harder to identify and outreach. Special populations such as migrant workers and other new Americans are more likely to be homeless, underserved, or at-risk according to the City of Las Cruces 10-year Plan to End Homelessness.

Point in Time Homeless Count, 2019

	Estimate the # of persons experiencing Homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year
	Sheltered	**Unsheltered**			
Persons in households with adult(s) and children	184	11			
Persons in households with only children	3	4			
Persons in Households with only adults	145	157			
Chronically homeless Individuals	55	67			
Chronically homeless families	6	1			
Veterans	39	21			
Unaccompanied Child	3	4			

Source: New Mexico Coalition to End Homelessness, 2019

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that person's experience homelessness," describe these categories for

each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The table below shows the results of the 2019 Point in Time (PIT) Count in Dona Ana County. There were 497 total homeless persons counted on that day. Of those, 168 were unsheltered and 329 were utilizing emergency shelter.

Point in Time Homeless Results January 2019

Dona Ana County	Number
Total Homeless 2019	**497**
Total Sheltered 2019	329
Total Unsheltered 2019	168
Total Individuals 2019	302
Total Individuals Sheltered 2019	145
Total Individuals Unsheltered 2019	157
Total Persons in Families 2019	195
Total Persons in Families Sheltered 2019	184
Total Persons in Families Unsheltered 2019	11
Total Family Households 2019	53
Total Family Households Sheltered 2019	52
Total Family Households Unsheltered 2019	1

Total Chronically Homeless 2019	151
Chronically Homeless Sheltered 2019	73
Chronically Homeless Unsheltered 2019	78
Chronically Homeless Individuals 2019	67
Chronically Homeless Persons in Families 2019	29
Total Veterans 2019	60
Total Veterans Sheltered 2019	39
Total Veterans Unsheltered	21

Source: New Mexico Coalition to End Homelessness

There were 60 veterans identified during the PIT. Of those, 39 were sheltered and 21 were unsheltered. Many veterans and veterans with families who are homeless or at risk of homelessness utilize the Supportive Services for Homeless Veteran's Program (SSVF), the HUD VASH program and its partner, Mesilla Valley Community of Hope. This significant focus on veterans at the local and federal level and flexible financial and service-based resources are helping veterans in Las Cruces obtain and maintain permanent housing. Interviews of representatives of homeless programs and services in Las Cruces were conducted to prepare an analysis of homeless needs.

Of the 494-total identified homeless people counted on this day, 122 were children. There were eight chronically homeless families counted with 59 family members. Thirty-two percent of individuals experiencing homelessness were severely mentally ill or suffered from chronic substance abuse.

Point in Time Homeless Subpopulations January 2019

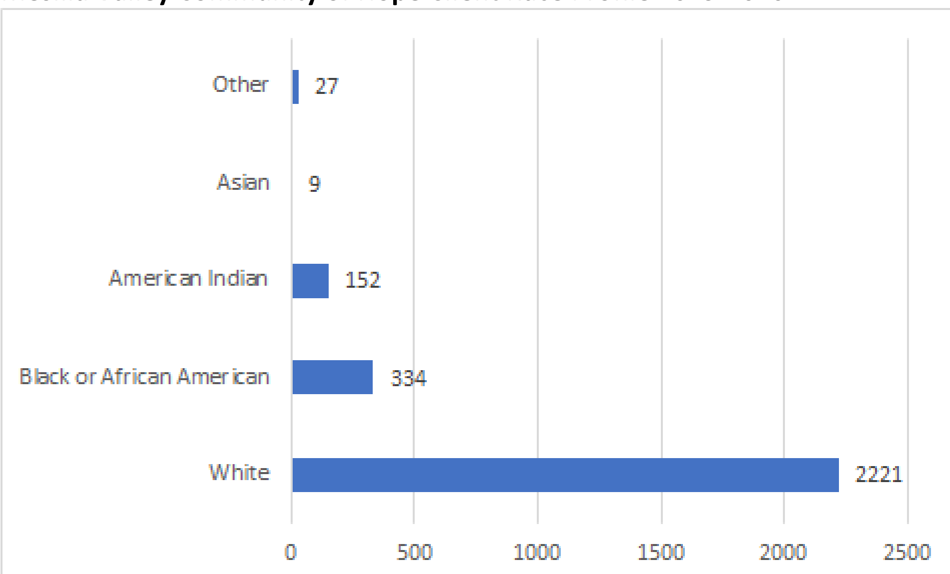
	Number
Households with children	53
Persons (under 18)	122
Persons (18-24)	12
Persons (over 24)	60
Households without Children	297
Persons (18-24)	15
Persons (over 24)	285
Total # of persons	494
Chronically Homeless Individuals	122
Chronically homeless Families	8
Chronically homeless Family Members	59
Severely Mentally Ill	108
Chronic Substance Abuse	55

Source: New Mexico Coalition to End Homelessness, 2019

Nature and Extent of Homelessness: (Optional)

The Mesilla Valley Community of Hope (MVCH) is the entry point for many of the homeless persons served by agencies in Las Cruces. The agency operates on a campus owned by the City, which includes a health clinic, soup kitchen, and childcare center for homeless children. While not the only entry point for homeless persons in Las Cruces, the MVCH is often the first stop for homeless individuals and families in Las Cruces, and coordinates services with partners on campus and off campus, including La Casa, the domestic violence shelter serving Las Cruces; Families and Youth Inc., serving homeless youth; and the Gospel Rescue Mission shelter. The table and charts below provide demographics of the 2,774 case managed clients served by MVCH during FY 2019-2020. The majority of clients were Caucasian (2,221), followed by African American (334).

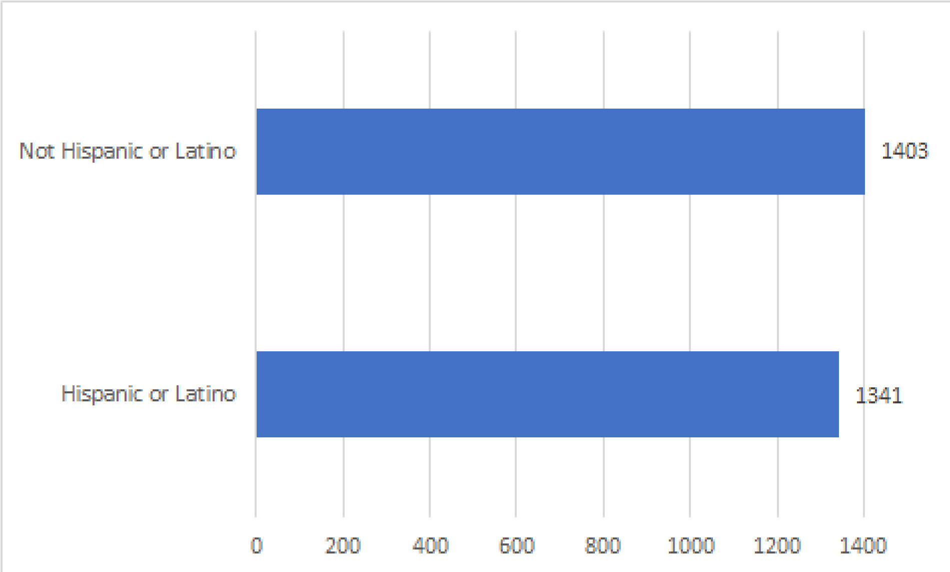
Mesilla Valley Community of Hope Client Race Profile 2019-2020



Source: Mesilla Valley Community of Hope, 2019-20

There were 1,341 clients who identified as Hispanic/ Latino and 1,403 who identified as Non-Hispanic.

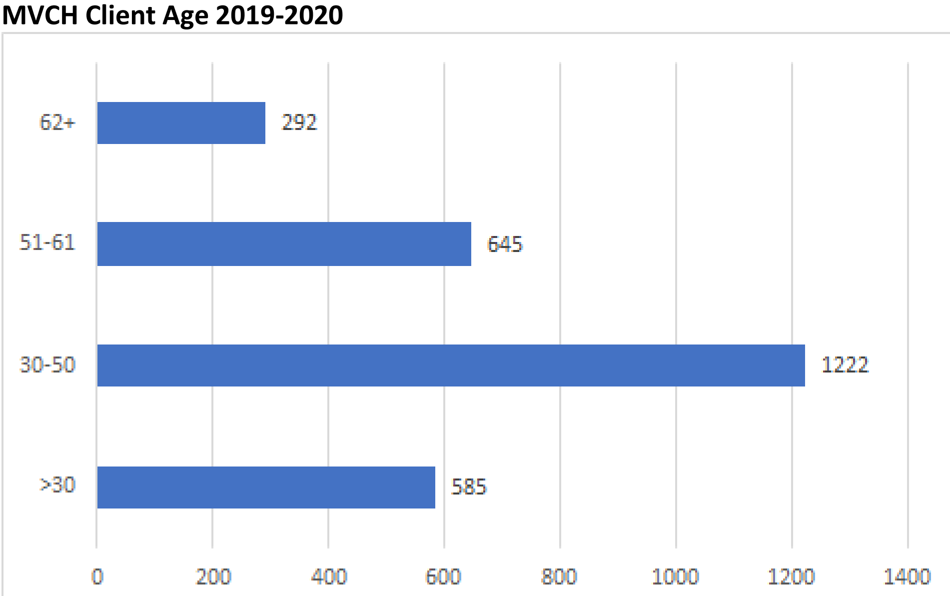
Mesilla Valley Community of Hope Client Ethnicity Profile 2019-2020



Source: Mesilla Valley Community of Hope, 2019-2020

Many homeless persons served through MVCH were age 30 and older. The age group with the largest number served was those age 30 – 50.

MVCH Client Age 2019-2020



Source: Mesilla Valley Community of Hope, 2019-2020

Clients at MVCH are coming from a variety of prior living situations. Almost one third were previously in their own rental, 37 percent were living on the streets, and 8.1 percent were in some sort of emergency shelter.

MVCH Prior Living Situation

	#	%
Street	241	37.0%
Emergency shelter	53	8.1%
Transitional Housing	5	0.8%
Psychiatric Facility	5	0.8%
Substance Abuse Facility	5	0.8%
Hospital	4	0.6%
Jail/Prison	18	2.8%
Domestic Violence Situation	1	0.2%
Friend/Relative	28	4.3%
Rental Housing	208	31.9%
Other	8	1.2%
Unknown	14	2.1%
Homeowner	7	1.1%
Hotel/Motel	25	3.8%
Subsidized Rental Housing	5	0.8%
Living with Relative	25	3.8%

Source: Mesilla Valley Community of Hope 2019

Of those served by MVCH in 2019-2020, 1,457 clients lived in households categorized as having "Extremely Low" income, 92 were categorized as having "Very Low" income, and 43 of the clients were categorized as having "Low" income.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

There were 60 veterans identified during the 2019 PIT count. Of those, 39 were sheltered and 21 were unsheltered. Many veterans and veterans with families who are homeless or at risk of homelessness utilize the Supportive Services for Homeless Veteran's Program (SSVF), the HUD VASH program with its partner, Mesilla Valley Community of Hope. There is significant focus on veterans at the local and federal level and flexible financial and service-based resources are helping veterans in Las Cruces obtain and maintain permanent housing. Some homeless veterans live at the tent city though it is only a temporary (12-month) solution. The Housing Authority owns an apartment complex where Community of Hope can place homeless veterans. There are 22 dedicated units and an on-site HUD VASH Representative and a Community of Hope Case Manager present to serve those veterans.

There were 53 family households counted during the PIT count with 195 family members. Most were sheltered (184), but there were 11 people in families who were unsheltered on the day of the PIT count. Around 30 percent of individuals experiencing homelessness were classified as "chronically homeless." The other 70 percent of individuals can obtain a new housing arrangement if they are able to gain better employment or receive economic assistance.

Community stakeholders report affordable housing for young families is difficult to come by, especially as the Las Cruces rental market has become increasingly competitive. Providers of services for at-risk children discussed a pressing need for larger public housing units to accommodate families and a need for increased inventory of assisted housing for this population. Children in foster care who are awaiting being reunited with parents can face delays due to family homelessness. The tables below show the numbers of students by age group who were identified as homeless during the 2019-2020 school year by the Las Cruces School District. There were 192 elementary aged students, and 436 total students experiencing homelessness.

Age range of homeless students in Las Cruces School District

Ages	**Number of homeless**
Under age 5	52
Elementary	192
Middle School	70
High School	122
Totals	**436**

Source: Homeless Families Program Las Cruces School District, 2019-2020

Most homeless students are in doubled up living conditions which can create significant stressors for young children. The numbers listed here only include identified homeless students. Those who work with these families believe there may be more who do not seek services or identify as homeless with their school.

Location/Situation of Homeless Students by age group during 2019-2020 School Year

	Under 5 years old	Elementary age	Middle school	High School	Total by Situation
Doubled up	45	163	56	111	375
Shelter	5	13	3	4	25
Motel/ Hotel	2	15	7	3	27
Unsheltered	0	1	4	4	9
Car/ RV	0	0	0	0	0
Total by Age	**52**	**192**	**70**	**122**	**436**

Source: Las Cruces School District Homeless Families Program 20119-2020

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The Mesilla Valley Community of Hope (MVCH) served 2,221 individuals in FY 2019-2020. Of those, 1,341 clients identified as Hispanic/ Latino and 1,403 identified as Non-Hispanic. Three hundred and forty-four people identified as African American and 152 identified as American Indian during this time. Black/African American individuals make up just 2.1 percent of Las Cruces' population but made up 15 percent of MVCH clients served in FY 2019-2020, indicating Black/African American individuals are more likely than other populations to experience homelessness. American Indian populations experience similar disparity. Making up just 1.1 percent of the population, American Indian individuals comprised 7 percent of MVCH clients in FY 2019-2020.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Of the 497 homeless people identified in the PIT Count, 329 were sheltered and 168 were unsheltered. There were 73 chronically homeless people in shelter and 78 who were not in shelter during this count. In addition to the PIT count data, Mesilla Valley Community of Hope (MVCH) served 2,221 individuals in FY 2019-2020. Almost one third were previously in their own rental, 37 percent were living on the streets, and 8.1 percent were in some sort of emergency shelter. The remaining visitors to MVCH were people leaving domestic violence, existing transitional housing and other facilities and in need of permanent housing solutions.

Providers of homeless programs and services, legal advocates for children and almost all other providers interviewed indicated that mental health and substance use services for parents, children, and individuals are lacking. Affordable childcare and access to transportation are often lacking for lower income people. These gaps create additional barriers for homeless people and those in crisis in Las Cruces.

Discussion:

All providers of services reported a significant need for mental health and substance use treatment options and an increased need for service enriched affordable housing in Las Cruces. A lack of appropriately sized affordable units for larger families contributes to family homelessness in Las Cruces. Progress has been made in addressing veteran homelessness with the availability of case management, housing vouchers, and more flexible financial resources to prevent homelessness. Other barriers for homeless persons identified by homeless service providers are a lack of jobs and employment opportunities, a livable wage, reliable public transportation, funding for existing program expansion, and Fair Housing practices by local private landlords.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The City of Las Cruces identifies several special needs groups that are served in a variety of settings. These populations include persons with physical disabilities, intellectual and developmental disabilities (IDD), mental health disabilities, substance use disorders (SUD), elderly, frail elderly, people with HIV/AIDS, victims of domestic violence, veterans, at-risk youth, migrant/seasonal workers and their families, and immigrant populations. Special needs communities often encounter financial barriers and access/availability of appropriate housing and services.

Describe the characteristics of special needs populations in your community:

Seniors

The number of seniors in Las Cruces has grown over the past decade and is expected to continue to grow through 2025 as the Baby Boomer population ages and continues to live longer. There is a clear need for gerontology-based medical services in the community. Local providers report an increase in the number of seniors with medical issues, including mental health and increasing need for home-based services. The CHAS table below shows the numbers of elderly households in Las Cruces in 2017 with one or more housing problems as defined by HUD. There were 620 senior households at 30% or below of the area median income (AMI) and 795 households between 31-50% of the AMI with one or more HUD defined housing problems. A large percentage of low- and moderate-income senior households in Las Cruces had at least one of the four housing problems. HUD defines “elderly” as those aged 62 to 74 and “extra elderly as those aged 75 and above.

HUD CHAS Senior Households with One or More Housing Problems, 2013-2017

	Total	0-30% AMI	31- 50% AMI	51- 80% AMI	81-100 % AMI	> 100 % AMI
All Households						
Elderly	8,075	620	795	1,135	420	5,105
Extra Elderly	4,460	270	620	790	345	2,435
Renters						
Elderly	2,085	355	440	370	135	785
Extra Elderly	1,170	120	210	305	130	405
Owners						
Elderly	5,990	265	355	765	285	4,320
Extra Elderly	3,290	150	410	485	215	2,030

Source: HUD CHAS Data 2013-2017

The HUD CHAS table below shows the cost burden of seniors by income range and tenure. The data shows that 13.7 percent of seniors are cost burdened, with 39.1 percent of seniors who rent experiencing cost burden. Just two percent of seniors who are homeowners experience cost burden.

HUD CHAS Senior Households by Cost Burden, Tenure, and Income Range, 2013-2017

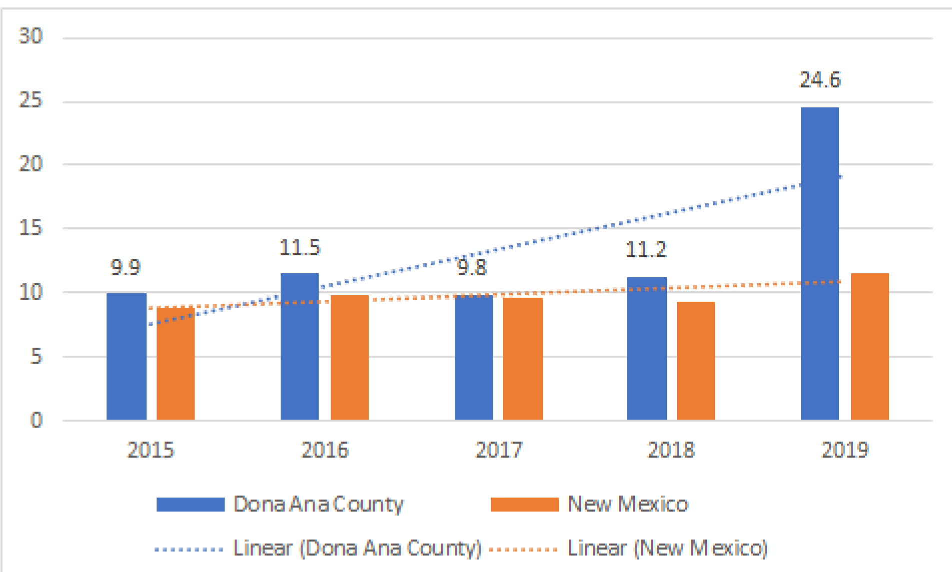
	Total	0-30% AMI	31-50% AMI	51-80% AMI	81-100 % AMI	> 100 % AMI
All Households						
Housing cost burden is less than or equal to 30%	4,770	10	35	490	190	4045
Housing cost burden is greater than 30% but less than or equal to 50%	630	15	145	205	70	195
Housing cost burden is greater than 50%	129	25	74	15	15	0
Total households	5,529	50	254	710	275	4240
Renters						
Housing cost burden is less than or equal to 30%	435	10	0	65	35	325
Housing cost burden is greater than 30% but less than or equal to 50%	245	0	20	115	50	60
Housing cost burden is greater than 50%	34	0	4	15	15	0
Total renters	714	10	24	195	100	385
Owners						

Housing cost burden is less than or equal to 30%	4,335	0	35	425	155	3720
Housing cost burden is greater than 30% but less than or equal to 50%	385	15	125	90	20	135
Housing cost burden is greater than 50%	95	25	70	0	0	0
Housing cost burden not computed (household has no/negative income)	0	0	0	0	0	0
Total owners	4,815	40	230	515	175	3,855

Source: HUD CHAS Data 2013-2017

Domestic Violence

Domestic Violence Rates Per 1,000 Population, 2015-2019



SOURCE: New Mexico Coalition of Sexual Assault Programs, 2020. https://nmcsap.org/wp-content/uploads/DV_Report_Trends_2015-2019_Betty_Caponera_Oct20web.pdf

Domestic Violence rates in Dona Ana County have increased dramatically since 2015, according to the New Mexico Coalition of Sexual Assault Programs. This makes Dona Ana County the highest county in the state for rates of domestic violence. There were 5,438 incidents of domestic violence in Dona Ana County in 2019, comprising 24 percent of all statewide domestic violence incidents. While new data is not yet available for 2020, it is estimated incidents of Domestic Violence have risen during the COVID-19 pandemic, due to sheltering in place orders. In Las Cruces, the domestic violence shelter (La Casa) estimates that it is at its maximum capacity 80 percent of the time. La Casa served 351 adult survivors of domestic violence in 2019.

Services Provided for Adult Victims of Domestic Violence

	2015	2016	2017	2018	2019
Adult Victims Served	360	417	375	308	351
Counseling	176	280	270	144	87
Emergency Services	153	143	161	152	197
Transportation	94	110	28	36	28
Financial Support	0	2	0	15	12
Housing	6	8	20	37	31
Protection Orders	48	35	26	12	19
Legal Advocacy	18	72	22	24	34
Psycho-Education Classes	59	52	66	47	93
Case Management	129	172	168	164	153
Crisis Intervention	245	241	271	218	261
Other	0	0	1	7	17

Source: New Mexico Interpersonal Violence Data Central Registry, 2015-2019

The table below indicates the types of services received by children who have witnessed or been a victim of violence in their homes in Dona Ana County from 2015-2019. In 2019, children were most likely served with emergency shelter, counseling, and daycare.

Number of Children Served and Number Receiving Each Type of Service in Dona Ana County, 2015-2019

	2015	2016	2017	2018	2019
Number of Children Victim-Witnesses	178	224	386	159	188
Counseling	116	120	80	36	175
Emergency Shelter	120	138	342	108	79
Day Care	0	0	0	0	0
School	12	0	0	0	0
Case Management	104	113	75	0	0
Other Services	--	0	0	0	0

Source: New Mexico Interpersonal Violence Data Central Registry, 2015-2019

Mental Illness

In Dona Ana County, there are 294.7 mental health providers for every 100,000 people, a lower amount than the statewide average (391.3). An estimated 14.8 percent of Dona Ana County adults experience depression, a slightly better rate than the New Mexico average (16.1%). In Dona Ana County, the average adult experiences 4.5 poor mental health days a month. The COVID-19 pandemic is impacting behavioral health in a significant way. A national study conducted in July 2020 found 53 percent of adults in the United States reporting their mental health has been negatively impacted due to worry and stress over COVID-19. Many adults are also reported specific negative impacts on their mental health and wellbeing, such as difficulty sleeping (36%) or eating (32%), increases in alcohol consumption or substance use (12%), and worsening chronic conditions (12%), due to worry and stress over the coronavirus.

While it is likely that most people with mental illness do not require specialized housing or services, some with serious mental illness are unable to obtain and maintain employment and may need significant support, medication monitoring as well as subsidized housing. Stakeholder interviews indicated the need for expanded mental health care for all ages within the community. There are financial barriers to acquiring community-based psychiatrists and other challenges in obtaining and transferring care to providers outside of the community. Creating conditions that increase availability would benefit the homeless and non-homeless special needs populations in Las Cruces and Dona Ana County.

Substance Use Disorders

According to the New Mexico's Indicator Based Information System (NM-IBIS), there were 17 drug overdose deaths per 100,000 population in Dona Ana County in 2017, up from 13.8 in 2013. According to NM-IBIS, New Mexico's drug overdose death rate has more than tripled since 1990. Approximately 16 percent of Dona Ana County residents binge drink - a higher rate than the state average (14.2%). A lack of substance abuse treatment options in Las Cruces is a barrier to care, especially for veterans, where it was noted by key stakeholders that substance use treatment programs for veterans through the VA exist in El Paso, but not in Las Cruces.

At-risk Youth

Families and Youth, Inc. serves disadvantaged, and homeless youth with a variety of programs including transitional housing and supportive housing. Agency staff indicate that there is a need for permanent housing units for youth once they leave the transitional program. A lack of reliable public transportation after 6 pm is also a gap for youth, who often are working jobs on weekends and in the evenings, and who depend upon public transportation instead of cars.

Staff from Mesilla Valley CASA (MV CASA) for children note that mental health services for children and their parents are lacking in Las Cruces. The agency also noted the lack of affordable housing and transportation barriers pointed out by Families and Youth, Inc. Other gaps identified by MV CASA are a limited number of support groups for youth, better coordination of services between the City of Las Cruces and Dona Ana County, and a lack of jobs that pay a living wage in Las Cruces.

Service providers noted the lack of in-person school learning due to the COVID-19 pandemic has made it difficult to provide services for and monitor youth and families who need assistance. Distance learning often disadvantages at-risk youth, who may not have equitable access to internet access, nor involved guardians to ensure and encourage their participation in remote school.

Migrant Farm Workers / Immigrant Communities

According to staff from the agency NM Café, needs for the migrant farm worker and immigrant communities in Las Cruces include safe, decent, affordable housing units, reliable public transportation, and affordable mental health services. These individuals may be most at-risk when it comes to understanding how to navigate the systems in place to help them, due to language or literacy barriers, and a mistrust of some local authority. Stakeholders also called attention to the issues immigrant communities and families face while existing outside the system: very little is available in the way of public assistance. For instance, while undocumented individuals did not receive a government stimulus of $1,200 or $600 dollars, neither did documented workers who resided in a home with undocumented persons.

Disabilities

In 2019 there were an estimated 7,693 adults aged 18 to 64 with a disability in Las Cruces. Those adults may have more than one disability. There were 5,748 seniors over the age of 65 with disabilities and 1,702 children with disabilities. The most common disabilities for seniors were hearing, ambulatory, and independent living difficulty. These disabilities can require service enriched or modified housing.

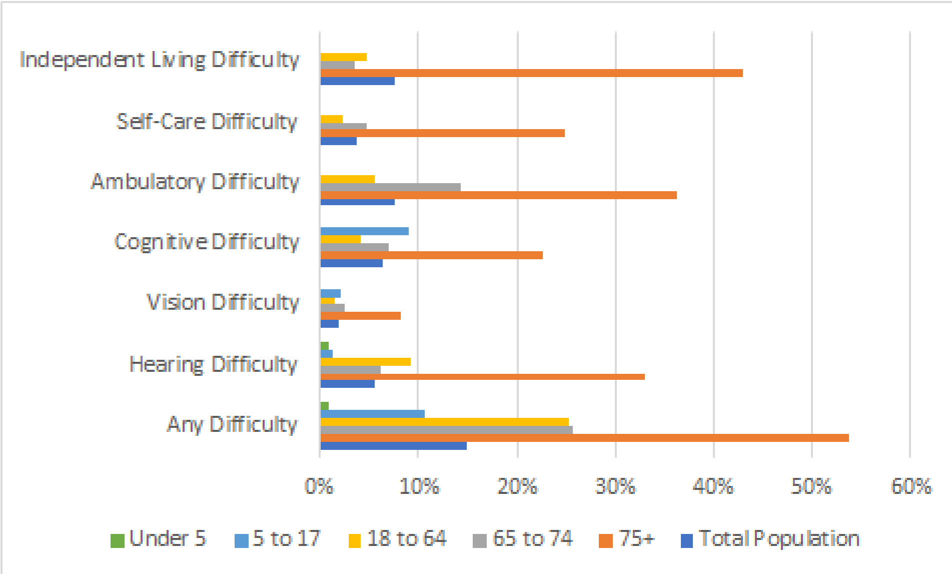
Disability Characteristics by Age/Difficulty, Las Cruces, 2019

	Under 5	5 to 17	18 to 64	65 to 74	75+	Total Population
Any Difficulty	0.8%	10.6%	25.2%	25.7%	53.7%	14.9%
Hearing Difficulty	0.8%	1.2%	9.1%	6.2%	33.0%	5.5%
Vision Difficulty	0.0%	2.0%	1.4%	2.5%	8.1%	1.9%
Cognitive Difficulty	ND	9.0%	4.1%	7.0%	22.6%	6.4%
Ambulatory Difficulty	ND	0.0%	5.6%	14.3%	36.3%	7.5%

Self-Care Difficulty	ND	0.0%	2.3%	4.8%	24.9%	3.7%
Independent Living Difficulty	ND	ND	4.8%	3.6%	42.9%	7.6%

SOURCE: American Community Survey, 1-Year Estimates

Disability by Type, Las Cruces



SOURCE: American Community Survey, 1-Year Estimates

The following table shows households with a disabled household member by tenure and income range. Among the lowest income group, 0-30% AMI, the most common household disability is self-care or independent living difficulty. Among the highest income group, greater than 80% AMI, the most common household disability is hearing or vision impairment.

HUD CHAS Disability Status by Tenure and Income Range, Las Cruces, 2013-2017

	Total	0-30% AMI	31-50% AMI	51-80% AMI	> 80% AMI
All Households					
Household member has a cognitive limitation	4,055	845	655	755	1,800
Household member has a hearing or vision impairment	5,120	540	675	850	3,055
Household member has a self-care or independent living limitation	4,680	815	780	890	2,195
Household member has an ambulatory limitation	6,135	970	775	1,165	3,225
Renters					
Household member has a cognitive limitation	2,250	640	435	460	715
Household member has a hearing or vision impairment	2,025	415	365	465	780
Household member has a self-care or independent living limitation	2,345	635	490	440	780

Household member has an ambulatory limitation	2,610	750	485	585	790

Source: HUD CHAS Data 2013-2017

The next table shows the number of households with one of the four housing problems and a disabled household member. The most common disability among renters with housing problems is ambulatory limitation. The most common disability among owners with housing problems is self-care or independent living limitation.

HUD CHAS Household with Housing Problems with Disabled Household Member

	Total	0-30% AMI	31-50% AMI	51-80% AMI	> 80% AMI
All Households					
Household member has a cognitive limitation	2,105	665	515	445	480
Household member has a hearing or vision impairment	1,820	355	430	485	550
Household member has a self-care or independent living limitation	2,020	575	610	420	415
Household member has an ambulatory limitation	2,315	730	620	500	465
Renters					
Household member has a cognitive limitation	1,520	500	360	330	330
Household member has a hearing or vision impairment	1,255	245	260	355	395

Household member has a self-care or independent living limitation	1,410	465	400	285	260
Household member has an ambulatory limitation	1,625	600	410	380	235
Owners					
Household member has a hearing or vision impairment	585	165	155	115	150
Household member has an ambulatory limitation	565	110	170	130	155
Household member has a cognitive limitation	610	110	210	135	155
Household member has a self-care or independent living limitation	690	130	210	120	230

Source: HUD CHAS Data 2013-2017

The table below shows the percent of people with a disability by race and Hispanic origin. One third of the Black/African American population in Las Cruces has a disability, the highest rate in Las Cruces. Hispanic households have a similar rate of disability than the white alone population.

Population by Disability by Race and Hispanic Origin Las Cruces, 2019

	Number With a Disability	Percent with a Disability
White	11,228	13.7%
Black/African American	1,007	34.3%
American Indian and Alaska Native	ND	-

Asian	ND	-
Native Hawaiian and Other Pacific Islander	ND	-
Some other race alone	1,557	16.1%
Two or more races	ND	-
White alone, not Hispanic or Latino	5,080	14.7%
Hispanic or Latino (of any race)	8,286	14.0%

Source: American Community Survey, 2019

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

As of 2016 there 372 persons living with an HIV infection in Dona Ana county and a total of 492 people with HIV/AIDS in Southwest New Mexico. Persons living in poverty and those without a high school education have a rate of HIV infection twice as high as other populations. This same source also shows that Hispanic and Black households' have higher rates than Caucasian people. Providers of assistance to people with HIV/AIDS find that most of their clients are at or below 80% of the area median income and often need financial assistance related to rent and utilities and/or mortgage areas.

What are the housing and supportive service needs of these populations and how are these needs determined?

Housing services needed:

- Emergency Financial assistance – rental and/or mortgage and utility assistance.
- HOPWA (Housing Opportunities for Persons with AIDS) – long term or short-term assistance for partial or full housing assistance which is determined by need, income, and availability.

Other supportive services needed:

- Medical and Non-medical case management services
- Early intervention services (EIS)
- ADAP – AIDS Drug Assistance Program
- AIDS Pharmaceutical Assistance
- Health Insurance Premium assistance
- Co-pay assistance for contracted HIV providers and lab visits
- Oral health care

- Food Bank/Food cards
- Medical Transportation (travel reimbursement/bus pass)
- Health education/Risk Reduction
- Referrals for Substance use, Harm Reduction, Behavioral Health, Nutrition, Psychosocial Support Services

Client's must be enrolled into Ryan White Services to be eligible to receive supportive services (this does not include HOPWA). Client's must be under the 400% FPL, a resident of New Mexico and be diagnosed with HIV to qualify. Once enrolled into services, a medical case manager will meet with the client to complete a detailed assessment of the client's needs. The assessment is then utilized to complete an acuity scale which is then used to determine the supportive services the client needs.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need:

Public Facilities:

The social safety net in Las Cruces is composed of a combination of City agencies and community-based organizations that supply short- and long-term service centers. Often, charitable groups do not have the resources to secure and maintain adequate facilities for their service activities. Critical health and safety improvements to community-based facilities, as well as structuring COVID-19 friendly protocols to provide safe services is an ongoing challenge. Top public facility needs identified in the project analysis included increased availability of mental health, substance use, and support centers, domestic violence shelters, and youth centers.

How were these needs determined?

To understand the need for public facilities in Las Cruces, the needs assessment section of this consolidated plan and the public participation process included service data analysis, stakeholder interviews, community focus discussion groups, and a citywide community survey.

Describe the jurisdiction's need for Public Improvements:

There are several low-income neighborhoods that lack basic infrastructure improvements such as sidewalks, curb and gutter, drainage and water and sewer improvements. The City maintains a Capital Improvements Plan and through its budget process identifies areas of need for investment in public improvements.

How were these needs determined?

To understand the need for public improvements in Las Cruces, the needs assessment section of this consolidated plan and the public participation process included service data analysis, stakeholder interviews, community focus discussion groups, and a citywide community survey.

Describe the jurisdiction's need for Public Services:

Many households in Las Cruces are priced out of the appreciating housing market. This economic stress on individuals and families is further exacerbated by the lack of other services that also contribute to a positive living situation. Many households which are at the lower end of the income spectrum are also dealing with other challenges that make it more difficult to maintain stable housing. Medical challenges, substance use challenges, domestic violence, nutritional needs, mental health issues, needs of children, and support for elderly residents in poverty all contribute to conditions that tear at the fabric of independence. The City, through its general fund and federal allocations, partners with local agencies and charitable groups to provide a level of basic services to assist those households in maintaining greater independence and stability. An essential aspect of this support system also involves making people aware they can obtain help when the need arises. Las Cruces is served by a strong supportive service system that can assist people challenged by poverty in getting the necessary help they need to overcome a range of challenging situations.

The COVID-19 pandemic had a major impact on households across the country and in Las Cruces. The unemployment rate reached an all-time high in July 2020 but has since declined. Households living at or under the federal poverty line are more likely to experience more negative impacts of the pandemic and thus requiring more access to assistance programs, like rental assistance, utility assistance, and access to food.

How were these needs determined?

To understand the need for public improvements in Las Cruces, the needs assessment section of this Consolidated Plan and the public participation process included secondary data analysis, stakeholder interviews, community focus discussion groups, and a citywide community survey.

MA-05 Overview

Housing Market Analysis Overview:

The Las Cruces housing market has seen a continued increase in demand over the past several years. Price per square foot for single-family homes is up 24 percent from January 2018 to January 2021, and the availability of single-family homes on the market has dropped 66 percent. The rental market is also very competitive. While vacancy rates are stagnant around 7 percent, rents have increased approximately 16 percent since 2010. Realtors, homebuilders, lenders, landowners, landlords, and current or prospective home buyers interviewed for this study indicated a lack of quality affordable housing units for sale or rent within the City for low-income families and individuals.

Overall, home value costs rose at a much greater rate nationally (33%) than in Las Cruces (3.5%) through 2019. But where home values have been slow to grow, median rent in Las Cruces has increased (15.6%), though not as much as the national level (28.3%) While affordability and supply are two of the major issues in Las Cruces, the quality of affordable housing has reported to be not good in many neighborhoods. Qualitative research has indicated that many properties for sale or rent to households of low-income are not updated, some have code violations, or are in areas with high crime.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Over half (56.7%) of the housing stock in Las Cruces is single family detached homes, and another 4.6% is attached townhomes and condos. Approximately one third of all housing in Las Cruces are small to large multi-unit buildings. Access to available buildable development sites and infrastructure costs are challenges to building additional dense housing within central Las Cruces. Landowners and builders have expressed interest in constructing new homes, both in the downtown core and in outlying areas. However, the process of facilitating new developments will require continued communication and partnership between city officials and homebuilders, to ensure business friendly tactics are used to yield increased affordable housing.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	25,676	56.7%
1-unit, attached structure	2,081	4.6%
2-4 units	4,009	8.9%
5-19 units	6,961	15.4%
20 or more units	2,170	4.8%
Mobile Home, boat, RV, van, etc.	4,352	9.6%
Total	***45,249***	

Table 31 – Residential Properties by Unit Number
Data Source: American Community Survey, 2019

Over 85 percent of all owners live in detached single-family homes, while 60 percent of occupy detached single-family homes.

Tenure by Units in Structure, 2019

	Owner		**Renter**		**Total**	
	Number	Percent	Number	Percent	Number	Percent
1-unit Detached	18,334	85.2%	6,101	35.6	24435	60.8%
1-unit Attached	1,062	4.9%	814	4.3	1876	4.7%
2 to 4 Units	265		3,092	16.5	3357	8.4%
5 to 19 Units	106	0.4%	5,235	28.0	5341	13.3%
20 or More Units	94	0.4%	2,076	11.1	2170	5.4%
Other (mobile home, RV, etc.)	1,654	7.6%	1,352	7.2%	3006	7.5%

Total	**21,515**	**18,670**	**40,185**

Source: American Community Survey, 2019

In 2019, most owners lived in homes with three or more bedrooms, while most renters lived in units with two bedrooms. Note the number of occupied units (40,185) is less than the total number of units (45,249), which accounts for vacant housing units (5,064).

Unit Size by Tenure

	Owner occupied:		Renter occupied:	
	Number	**%**	**Number %**	
No bedroom	34	0.2%	749	4.0%
1 bedroom	231	1.1%	3,817	20.4%
2 bedrooms	2,421	11.3%	8,051	43.1%
3 or more bedrooms	18829	87.5%	6,053	32.4%
Total	**21,515**		**18,670**	

Table 32 – Unit Size by Tenure

Data Source: 2019 American Community Survey, 5-Year Estimates

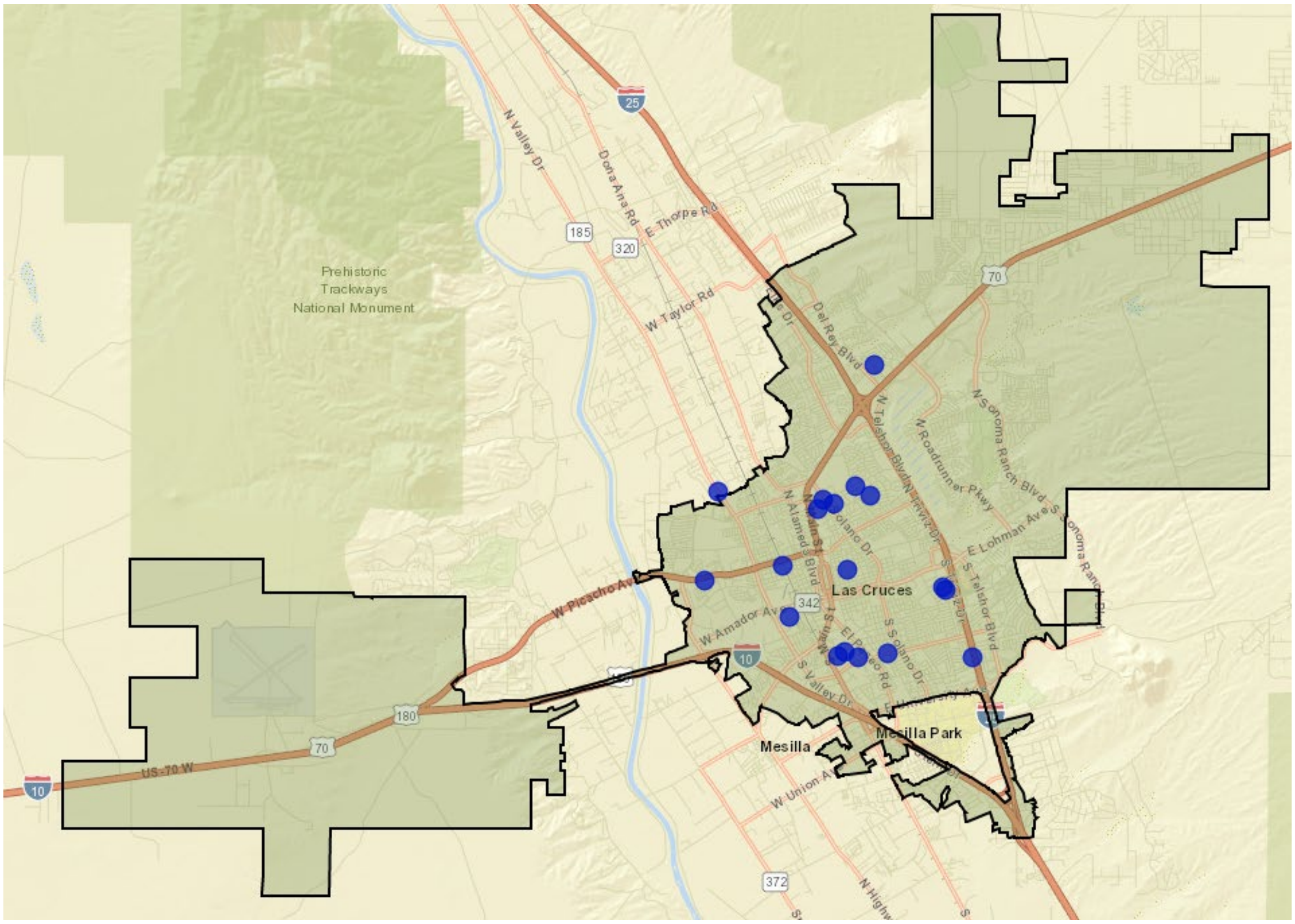
The following list includes public housing units, Section 8 financed units, LIHTC units and other price restricted units owned by the Mesilla Valley Housing Authority, Tierra del Sol, other nonprofits and private ownership interests in Las Cruces. There are a total of 1,547 units included. Most units have income restrictions at 50% or 60% AMI. Pecos Apartments are currently (2020) being remodeled with LIHTC, City funds, and HOME funds. Desert Hope, a new complex, will open in July 2021 with 40 units.

Price Restricted Rental Units in Las Cruces

Property Name	Total Units	Price Restricted
Doña Ana Park Apartments	132	132
Highland Park Apartments	50	50
Montana Meadows Apartments	80	80
Desert Palms	100	100
Four Hills Apartments	72	60
Mesquite Village	48	48
Stone Mountain Place	84	72
Vista Montana	80	79
Casa de Corazones	15	14
Chaparral Senior Apartments	40	40
Mira Vista Senior Village	76	60
Montana Senior Village	49	48
St. Genevieve Village	42	41
Los Altos Apartments	72	60
Alta Tierra	56	56
Burley Court Apartments	40	40
Robledo Ridge Apartments	70	61
El Crucero	12	12
Cactus Gardens (Duplex)	2	2
Cactus Gardens (Duplex)	2	2
Alta Tierra	57	57
La Casa - NSP Rental Housing	5	5
MVCH - NSP Sue's House	1	1
Abode	15	15
Oak Street	20	20
Tres Arboles	64	64
San Pedro Place	38	38
Walnut Grove	100	100
Jardines Alegres	47	47
Jardines Verdes	40	40
Almedra Apartments	18	18
Pecos Apartments	20	20
Total	**1,547**	**1,482**

Source: City of Las Cruces, Mesilla Valley Housing Authority, Tierra del Sol

Locations of Price Restricted Rental Units



Source: ESRI

Units are mostly two- and three-bedroom units.

Restricted Units by Bedroom Size

Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5+ Bedroom(s)
4%	26%	32%	33%	5%	0%

Source: Mesilla Valley Housing Authority, Tierra Del Sol

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City of Las Cruces
MOUNTAINS OF OPPORTUNITY

Table 25: Ownership Housing Gap (Supply/Demand) Analysis

Measure	Supply of Existing Owner-Occupied Units	Number of Households Able to Afford Units	Existing Surplus (Deficit) of Units
Owner Occupied Homes	21,515		
< $50,000 (Home Value)	1,162	982	180
$50,000 - $99,999 (Home Value)	1,999	950	1,049
$100,000 - $149,999 (Home Value)	5,247	2,171	3,076
$150,000 - $199,999 (Home Value)	6,658	3,391	3,267
$200,000 - $349,999 (Home Value)	4,153	8,284	(4,131)
$350,000 - $499,999 (Home Value)	2,112	2,706	(594)
$500,000 - or More (Home Value)	184	2,406	(2,222)
Median Home Value	$165,300		
Housing Unit Vacancy Rate (% of Total Housing Units)	11.2%		
Number of Vacant Units (Weighted)	5,064		

Total Housing Supply	**45,249**		

Source: American Community Survey, Crescendo Consulting Group

Table 26: Price Gaps for Renters

	Supply of Existing Renter Occupied Units	Number of Households Able to Afford Units	Existing Surplus (Deficit) of Units
Total Occupied Rental Supply (Paying Rent)	17,507		
Occupants Paying No Rent	1,163		
$1 - $499	2,682	5,565	(2,883)
$500 - $999	11,140	4,550	6,590
$1,000 - $1,499	3,042	1,581	1,461
$1,500 - $1,999	266	3,052	(2,786)
$2,000 - $2,499	377	1,352	(975)
$2,500 - $2,999	0	803	(803)
$3,000 or More	0	156	(156)
Median Monthly Rent	791		
Rental Vacancy Rate	8.7%		

Number of Vacant Units (Weighted)	5,064
Total Rental Supply	**20,449**

Source: American Community Survey, Crescendo Consulting Group

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

There are currently 1,547 price restricted rental units in Las Cruces aimed at serving low-income individuals. All restrictions are for households at income levels from 0–60% AMI.

Habitat for Humanity and Tierra Del Sol build affordable homes for households earning 80% or less of the AMI. Habitat provides a zero percent interest loan with affordable monthly payment to homeowners who contribute up to 500 hours of "sweat equity" in the building of their home, and Tierra Del Sol also uses a self-help model with low-cost mortgages for buyers. The two agencies build approximately 14-15 units per year to help low-income households afford to buy a home in Las Cruces.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

At this time, the Mesilla Valley Public Housing Authority does not have any plans to dispose of public housing units in Las Cruces that are owned by the Housing Authority.

Does the availability of housing units meet the needs of the population?

For individuals and families earning less than 80% AMI, there is a need for more affordable housing or subsidy programs to make homeownership attainable for low-income earners.

Table 27: Sales Market Gaps						
	Potential Buyers (Current homeowners excluding renters)	Income Limit	Affordable Price	Units Available (12 m supply)	Median Priced Home	Subsidy Needed
0-30%	980	$13,539	$49,900	17	$165,300	$115,400
31-50%	633	$22,565	$83,200	172	$165,300	$82,100
51-60%	317	$27,078	$99,800	87	$165,300	$65,500
61-80%	1,443	$36,104	$133,200	269	$165,300	$32,100
81-100%	1,842	$45,130	$166,400	316	$165,300	None
101-120%	2,641	$54,156	$199,700	73	$165,300	None
120% and over	13,416	>$54,156	>$199,700	252	$165,300	None
Total Occupied Homeowners (excl. current renters)	**21,273**					

SOURCE: Source: ACS, 2019 1-year Estimates. MLS Listings.

Describe the need for specific types of housing:

There is a need for rental housing for individuals and families at 60% AMI or less. The need is especially acute for those at 0–30% AMI. Persons on fixed incomes and persons with special needs, such as disabled individuals, need deeply subsidized units that are accessible and close to public transportation and service enriched housing. There is also a need for homeownership opportunities for those at 80% AMI or less.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The Las Cruces housing market has seen a continued increase in demand over the past several years. Price per square foot for single-family homes is up 24 percent from January 2018 to January 2021. The rental market is also very competitive. Rents have increased approximately 16 percent since 2010.

Cost of Housing

	Base Year: 2010	Most Recent Year: 2019	% Change
Median Home Value	$159,600	$165,300	↑3.6%
Median Housing Costs (Owner)	$1,156	$1,193	↑3.2%
Median Contract Rent	$684	$791	↑15.6%

Table 33 – Cost of Housing

Data Source: American Community Survey, 2010, 2019

Rent Paid	Number	%
Less than $500	2,682	15.3%
$500-999	11,140	63.6%
$1,000-1,499	3042	17.4%
$1,500-1,999	266	1.5%
$2,000 or more	377	2.2%
Total	17,507	

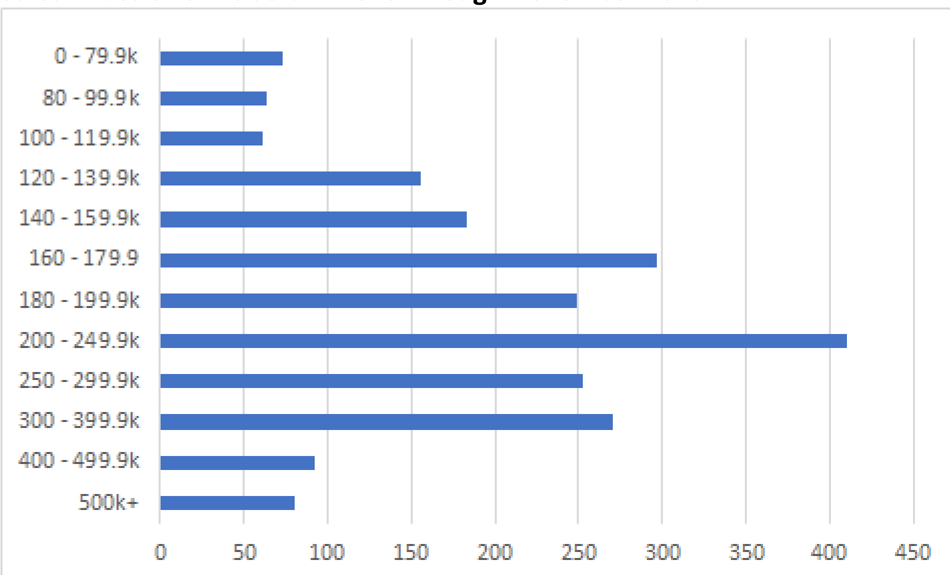
Table 34 - Rent Paid

Data Source: American Community Survey, 2019

Rent Paid Narrative

The median gross rent in Las Cruces is $791, up 15.6 percent from $684 in 2010. For example, a worker earning the minimum wage of $10.50 an hour who works the standard 40 hours a week would gross $1,680 a month. The median rent of $791 would be almost half the workers monthly income putting them in the severely house burden category. Of the 17,507 renters in the city, the majority (11,140) pay between $500-$999 per month.

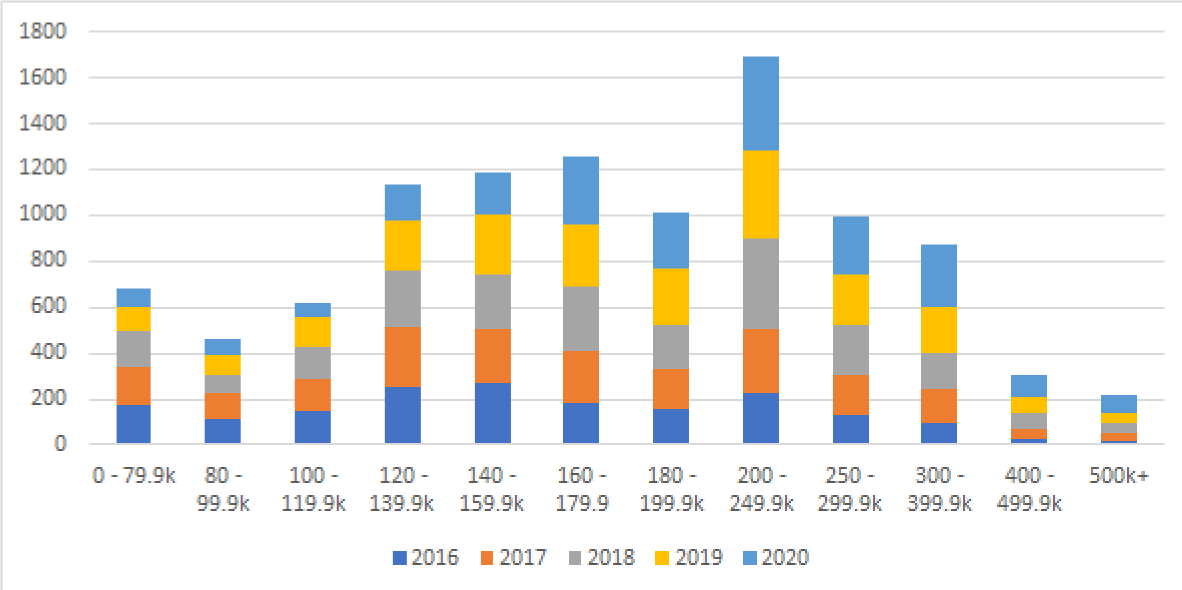
Sales Prices of Units Sold in 2020 through November 2020



Source: MLS

In 2020, most housing units sold for a price between $200,000 - $250,000. The median home value in Las Cruces in 2019 was $165,300, indicating the majority of movement in the Las Cruces housing market is operating above what low-to-median households can afford. Due to the very limited supply of houses and the COVID-19 pandemic, the median sale price for a house in Las Cruces was $200,000 putting it significantly higher than many low-to-moderate income households can afford.

Sales by Price Range, 2016 – 2020, Las Cruces



Source: MLS

While the median home value in the city is $165,300, home sales skew higher, with the most common sale bracket being between $200,000-$249,999.

According to HUD estimates, there are a total of 12,330 owner and 7,545 renter occupied units affordable to households at 100% AMI or less in Las Cruces. Affordable rental units decreased from 12,243 to 7,545 (a 38 percent decrease) from 2011 to 2017, while affordable homes on the market increased from 9,711 to 12,330 (a 27 percent increase). This figure underscores the growing disparity between owners and renters in Las Cruces.

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	845	No Data
50% HAMFI	1,520	3,475
80% HAMFI	5,180	4,895
100% HAMFI	No Data	3,960
Total	**7,545**	**12,330**

Table 35 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	506	574	700	1,012	1,211
High HOME Rent	506	574	700	914	1,000
Low HOME Rent	470	503	605	698	778

Table 36 – Monthly Rent
Data Source: HUD FMR and HOME Rents

Current Rents Compared to HUD Fair Market Rents and HOME High Rent Limits, 2019

	Median Rent	FMR	% Difference	High HOME	% Difference
Efficiency	$500	$506	1.20%	$506	1.20%
One Bedroom	$601	$574	-4.40%	$574	-4.40%
Two Bedroom	$757	$700	-7.50%	$700	-7.50%
Three Bedroom	$980	$1,012	3.30%	$914	-6.70%

Source: HUD 2019 Rent Limits, American Community Survey, 2019

Is there sufficient housing for households at all income levels?

No, there is not enough price restricted rental housing for renter households earning 60% or less of the AMI, and especially for those extremely low renter households at 30% AMI or less. Renters earning under 80% AMI may have a hard time finding an affordable unit for sale as prices rise in Las Cruces. Stakeholders interviewed throughout the project indicated that many homes affordable at 80% AMI or less may need repairs and updates.

How is affordability of housing likely to change considering changes to home values and/or rents?

Gaps for households at 80% AMI or less will most likely remain constant, as there is no large influx of households expected in Las Cruces, and prices have remained stable over the past few years.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Median rents for one- and two-bedroom units in Las Cruces are higher than the Fair Market Rent. Efficiency and three-bedroom units in Las Cruces are slightly more affordable than Fair Market Rent. Qualitative research revealed that private landlords are reluctant to rent to Housing Voucher holders for various reasons. If Housing Vouchers provided slightly higher rents than the fair market, then more landlords might be open to renting to voucher holders.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

In addition to analyzing housing costs, it is essential to also study the condition of the housing stock within a community. Older housing units may need rehabilitation or upgrades to make them safe and habitable. Older units may also have lead-based paint or other hazards that need to be mitigated. The following information provides an analysis of the condition of housing units in Las Cruces.

HUD calculates the number of occupied housing units with one or more “selected conditions” by tenure. These conditions include:

- Lack of complete plumbing
- Lack of complete kitchen facilities
- More than one person per room
- Cost burden greater than 30%

Most households with a housing condition in Las Cruces only have one housing condition. In Las Cruces, very few housing units lack complete plumbing. In Las Cruces, HUD estimates there were 200 rental units and 75 owner occupied units without complete plumbing or kitchen facilities in 2019. There were 495 severely overcrowded households in Las Cruces, 280 renters and 215 owners, respectively. Overcrowding is most often a result of households living in units too small for their families because of cost or housing availability, or because of a lack of units large enough for their households. Cost burden is the greatest issue facing Las Cruces households, as reported in the Housing Needs section of this report and can be assumed to be the one selected condition most often found in the City.

Definitions

Las Cruces will employ the following definitions and standards to units which may be under consideration for Home Repair services within the Rehabilitation Program:

Standard Unit(s) not suitable for Rehabilitation: Dwelling units that meet minimum local, state, and federal code requirements adopted by the City of Las Cruces and are in good condition requiring only cosmetic work, correction of minor livability problems, or maintenance work.

Substandard, Suitable for Rehabilitation: Dwelling units that do not meet minimum local, state, and federal code requirements adopted by the City of Las Cruces but are both financially and structurally feasible for rehabilitation. This does not include units that require only cosmetic work, correction of minor livability problems, or maintenance work.

Substandard, Unit not Suitable for Non-Substantial Rehabilitation: Dwelling units that are in such poor condition as to be neither structurally nor financially feasible for rehabilitation, such as instances where most of a unit is structurally unstable and thereby unsafe for habitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	**%**	**Number**	**%**
With one selected Condition	9,778	18.0%	12,083	36.6%
With two selected Conditions	330	0.1%	971	2.9%
With three selected Conditions	0	0.1%	12	0.0%
With four selected Conditions	0	0.0%	0	0.0%
No selected Conditions	44,211	81.4%	19,901	60.3%
Total	***54,319***		***32,976***	

Table 37 - Condition of Units

Data Source: 2013-2017 CHAS

Owner occupied units in Las Cruces are moderately newer than renter occupied units. Two-thirds (66.9%) of owner-occupied units were built in 1980 or after, while only 58 percent of renter occupied units were built in 1980 or after. Units constructed before 1980 may need rehabilitation and upgrades and may also contain lead-based paint.

Year Unit Built – SOURCE: CHAS, 2013-2017

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	**%**	**Number**	**%**
2000 or later	8,005	37.3%	4,400	24.2%
1980-1999	6,345	29.6%	6,215	33.8%
1950-1979	6,585	30.7%	7,060	38.4%
Before 1950	505	2.4%	655	3.6%
Total	***21,440***		***18,370***	

HUD calculates the number of housing units that may be at-risk for lead-based paint hazards. Units built before 1980 may have lead-based paint, which is dangerous to children if not properly encapsulated or remediated. The following table shows the number of homes built in Las Cruces before 1980 where children are present. New Mexico has not conducted any area wide lead-based paint studies which would help determine how many children may be at-risk for lead poisoning in Las Cruces. Owners of rental housing units should test for lead to ensure rental units are safe for children living in them. Homes rehabilitated with CDBG funds and built before 1978 must meet all HUD lead-based paint safety requirements.

HUD estimates of the units built before 1980 where children are present, 650 owner-occupied units and 1,325 renter-occupied units may contain a lead hazard.

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	7,090	33.1%	7,115	42.0%
Housing Units built before 1980 with children present	650	3.0%	1,325	7.2%

Table 39 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2008-2012 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	NA	NA	NA
Abandoned Vacant Units	NA	NA	NA
REO Properties	NA	NA	NA
Abandoned REO Properties	NA	NA	NA

Table 40 - Vacant Units

REO Properties

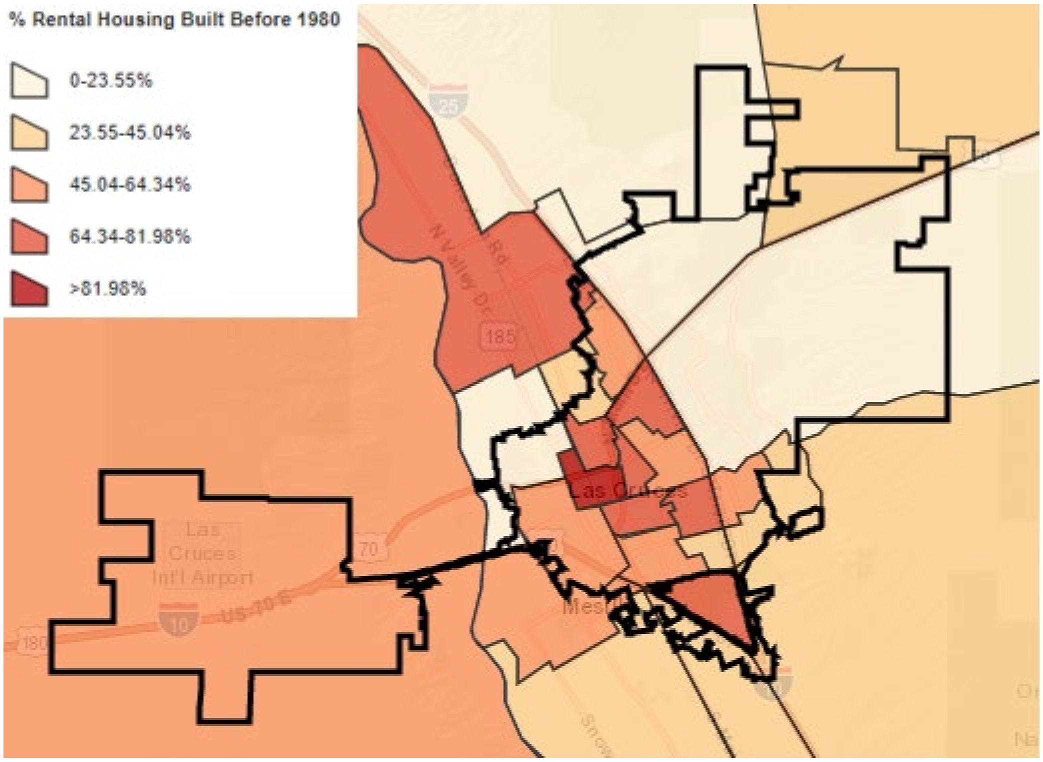
According to www.auction.com, there are six single-family homes on auction in Las Cruces.

Vacant Units in Las Cruces

There are 5,064 vacant housing units in Las Cruces, or 11.1% of all housing units. 7.5% of rental units are vacant, 2.9% owner units are vacant.

Need for Owner and Rental Rehabilitation

The following map shows the percent of rental housing units in each Las Cruces census tract constructed before 1980. These units are more likely than newer units to contain lead paint, lack complete plumbing and kitchens, and to need upgrades to major systems, including heating, cooling, roofs, electrical and plumbing. Units in these areas of Las Cruces are most likely to benefit from the owner-occupied housing rehabilitation program than units in areas of town with higher concentrations of units constructed since 1980.



Source: HUD CPD Maps

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

HUD estimates of the units built before 1980 where children are present, 650 owner-occupied units and 1,325 renter-occupied units may contain a lead hazard.

Discussion

There is a need in Las Cruces for rehabilitation programs targeting the city's oldest housing stock. CDBG and HOME funding can provide owners of owner occupied, single-family housing resources to meet needed repairs. These repairs include structural and cosmetic repairs of a housing unit interior and exterior, along with testing for and remediation or abatement of lead-based paint hazards in older housing units.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Mesilla Valley Housing Authority owns 248 units of public housing in four developments and has no plans to dispose of units in the next five years. The Housing Authority owns 40 Section 8 financed rental units as well. The Housing Authority has 75 VASH Vouchers, and 40 Family Unification vouchers, in addition to the 100 vouchers available throughout Dona Ana County.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available			248	1,647			75	40	100
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 41 – Total Number of Units by Program Type

Data Source: Mesilla Valley Public Housing Authority

Describe the supply of public housing developments:

The Housing Authority owns 248 units of public housing in Las Cruces in four locations. Tres Arboles is a 64-unit family property, San Pedro Place is 38 units of senior and disabled housing, Walnut Grove is 100 units of family housing and Jardines Alegres is 47 units of elderly/disabled housing. All are low density properties that stay mostly full.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Public housing units in Las Cruces are kept to HQS standards, but most are outdated properties.

Public Housing Condition

All units have been rolled into one for a housing inspection score. Inspections are conducted every 3 years. In 2018, the MVPCA units' score was: 88. Inspection scores are comprised of physical housing characteristics and building management.

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The city intends to oversee conversion of Public Housing to Project-Based Assistance under Rental Assistance Demonstration (RAD).

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Housing Authority has a Resident Advisory Board, and resident council boards for each of the four public housing developments. The Housing Authority has worked with private and public developers of housing to partner on Low Income Housing Tax Credit developments to expand the inventory of affordable rental properties available in Las Cruces.

Discussion:

The Mesilla Valley Housing Authority intends to conduct demolition and/or disposition, conversion of Public Housing to Tenant-Based Assistance, conversion of Project-Based Assistance under RAD, and employ Project-Based vouchers to fulfill the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families in Las Cruces.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Las Cruces and its partners provide a continuum of homeless facilities and services for individuals and families experiencing homelessness and those who are at risk of becoming homeless. Programs provided through the Continuum of Care include emergency shelter, supportive services, transitional housing, permanent supportive housing and Housing First (Rapid Rehousing). The New Mexico Coalition to End Homelessness (NMCEH) takes the lead in developing New Mexico's Continuum of Care Plan. NMCEH convenes and manages the Continuum of Care planning process and the Mesilla Valley Community of Hope provides multiple services for the homeless and chronically homeless population in Las Cruces. The table below outlines the numbers of beds under each umbrella category. The following section describes facilities and services in detail.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	70	0	34	108	0
Households with Only Adults	12	0	26	132	0
Chronically Homeless Households	0	0	0	22	0
Veterans	0	0	0	101	0
Unaccompanied Youth	0	0	0	0	0

Table 43 - Facilities and Housing Targeted to Homeless Households

SOURCE: New Mexico Coalition to End Homelessness, 2019

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.
The Mesilla Valley Community of Hope is a provider of services that connects people who are experiencing homelessness with opportunities to apply for public benefits, such as SSI, SSDI, food assistance, employment, and training through the SOAR program, and other programs. MVCH case management staff provides one-on-one assistance in accessing public benefits, legal assistance, and other mainstream services. Its partnerships with multiple organizations such as the Department of Workforce Solutions, increases employment connections for its residents and clients.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Mesilla Valley Community of Hope (MVCH) – MVCH is a service center designed to assist homeless and address poverty issues in Las Cruces and Dona Ana County. MVCH offers case management, day shelter, an overnight tent city for individuals who are homeless, and assistance with disability applications and other community resources to help transition from homelessness into permanent housing solutions. Continuum of Care programs administered by MVCH include Sue's House, a permanent housing program for chronically homeless women, the Oak Street Apartments for homeless veterans with the Mesilla Valley Public Housing Authority, two HUD Rapid Re-housing programs which serve 40 people, the Abode permanent supportive housing program for chronically homeless men, and a Supportive Services for Veteran's Families (SSVF) Program. Other housing programs include short term housing in apartments for up to three months, rapid rehousing assistance, and homeless prevention assistance. MVCH also offers services such as case management, laundry, showers, lockers, assistance in obtaining identification and public income, and access to computers.

Gospel Rescue Mission is the only indoor shelter in Las Cruces that offers emergency food and shelter and is accessible 24 hours per day, year-round. The shelter is operated by 70 volunteers and seven paid staff members, is self-funded with no city, state, or federal funding sources, and will take families and individuals. As of January 2021, Gospel Rescue Mission was housing 24 adults and seven children in its shelter.

El Caldito Soup Kitchen is a non-profit provider of food and meals for homeless and low-income people in Las Cruces and the surrounding rural communities. El Caldito offers a mid-day meal to between 250 and 300 persons six days, per week and is staffed by three-part time employees and several volunteers. The agency also provides sack lunches on Saturdays.

Families and Youth Inc. is an organization geared toward helping families and at-risk youth and children. It operates permanent supportive housing Transitional Living Program outlined in greater detail in the Special Needs Section of this report.

La Casa Domestic Violence Shelter – La Casa domestic violence shelter can shelter up to 80 people and approximately 26 children for up to 90 days. This includes both men, women, and families. La Casa has transitional housing units which they own (5 units which are scattered site units). It provides non-residential support as well. The shelter itself is typically full about 80% of the time. The shelter expanded in 2009 due to an increasing need to assist more female and male victims of violence. The agency's transitional housing program assists 22 families with tenant based rental assistance through the Continuum of Care process. Residents and those seeking services must have proof of documentation or they cannot be assisted, which agency staff identifies as an issue for undocumented community members in need. The tenant based rental assistance provided through HOME funds allows up to 24-month stay. La Casa also provides non-residential counseling/case management, legal advocacy, immigration specialists to determine status, and a court ordered batterer program. La Casa has an MOU with Catholic Charities who can help undocumented persons and immigrants in Las Cruces.

Amador Health Center - Amador Health Center (Previously known as St. Luke's Health Clinic) is a significant partner of MVCH. It is located at the homeless campus and operates 5 days per week. It provides primary health care, prevention education, diagnostics/treatment center, chronic disease management and is a Federally Qualified Health Center (FQHC). Amador has a full-time nurse practitioner, volunteer doctors and provides Medicaid enrollment assistance on site. The outreach program operates an eye clinic and a foot clinic. They collaborate with the Department of Health on Harm Reduction Strategies and operate the Dona Ana Indigent program that targets low-income people who are not eligible for other insurance. Amador also recently started a Behavior Health Program funded by The Substance Abuse and Mental Health Services Administration (SAMHSA). The program will provide counseling, substance abuse outpatient services, and job readiness assistance. Amador also collaborates with Opportunities of Hope for Housing Counseling assistance for its patients in need.

Jardin de los Ninos - Jardin de los Ninos is an early childhood education program that provides education, and therapeutic and other comprehensive services to children and their families who are homeless or at risk of homelessness. The childcare facility is located on the homeless campus and the agency coordinates with other homeless providers to support homeless families with children.

Las Cruces Veteran Affairs - The Las Cruces New Mexico VA Community Based Outpatient Clinic (CBOC) delivers primary care services to eligible veterans in Dona Ana County and outlying areas. It provides health screening, health promotion, education, acute and chronic disease management, and primary and mental health care. The New Mexico VA Health Care Systems HealthCare for Homeless Veteran's Program (HCHV) is designed to end veteran homelessness through outreach, community partnerships establishing health care access for veterans, and assisting with benefits and discharge documents. However, the nearest VA services for substance use and psychiatric care case management are in El Paso.

The VASH program is the local VA Supportive Housing Program that serves homeless veterans with health, mental health, and substance abuse challenges in Las Cruces. The VASH program has 80 vouchers in Las Cruces. The program provides two VASH staff located at the housing authority to discuss the program with potential program participants and to assist them in obtaining housing and health care. VASH is well coordinated with MVCH, which provides flexible funds for security deposit, rent arrears, and in issuing vouchers to clients. The Mesilla Valley Housing Authority operates the HUD VASH Program for homeless veterans who have health, mental health, and/or substance abuse disorders. It is a provider of 80 VASH Vouchers and works directly with the VA to serve homeless veterans. Even with vouchers, a lack of safe affordable housing for veterans exists.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

FOOD, TRANSPORTATION, SENIOR CENTER FRAME WITH COVID OUTLOOK

The City of Las Cruces identifies several special need populations within the city. They include persons with physical disabilities, intellectual and developmental disabilities (IDD), mental health disabilities, people with Substance Use Disorders (SUD), elderly, frail elderly, people with HIV/AIDS, victims of domestic violence, veterans, at-risk youth, and the immigrant community. The primary housing need of many households is affordable inventory and services. Many people with special needs require supportive housing and services to allow them to live in the least restrictive environment and to avoid homelessness.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Seniors

In-home health care and accessible and affordable living quarters are all necessary components for some members of the aging population in Las Cruces. Transportation assistance, light housekeeping/shopping and other disability services are necessary supportive housing for many seniors. The emotional and physical well-being of this group relies on available services, and affordable housing and service options. In addition, seniors are more likely to have a disability than other populations. Some may need 24-hour care to remain safely in their homes as cognitive and physical abilities change over time.

City of Las Cruces Senior Programs and Munson Center provides comprehensive senior programs, coordination of services, nutrition and meal services, Long Term Care Services, arts and crafts, language and physical fitness activities, case management (assessments and resource referral assistance) and In-home services including meals on wheels, homecare (light housekeeping), and respite care. The City's Senior Resource Center staff offer information, referrals, assistance and advocacy to seniors at no charge. They provide Medicare/Medicaid information, a "Grandparents Raising Grandchildren" program and many other relevant workshops on –site.

Dial a Ride – Dial a Ride provides Curbside transit for people with disabilities and seniors. The program operates 7am to 7pm Monday through Friday and has a modified Saturday schedule and no Sunday service. Dial a Ride has eight routes and one combined route.

Immigrant Communities

New Mexico Comunidades de Acción y de Fe (CAFé)- New Mexico CAFé is a non-partisan 501c3 organization that is part of the PICO (People Improving Communities through Organizing) National

Network.   CAFé is an advocacy organization that focuses on increasing community engagement on citizenship, immigration reform, subprime lending issues, and community organizing.

La Clinica de Familia (LCDF)- La Clinica de Familia is a private, not-for-profit federally qualified health center (FQHC) that provides health care for the entire family through a system of medical clinics, dental clinics, school based clinics, behavioral health services, and mental health services.

Catholic Charities - Catholic Charities provides immigration legal services, financial assistance and counseling for individuals and families in need. They are a mental health care provider for people in crisis and offer some cash assistance to individuals and families who are homeless. They partner with many local organizations to provide services for people in need in Las Cruces.

Disabilities

Members of the community who have physical disabilities need accessible, affordable housing options with a spectrum of services available to be tailored to their individual needs. Transportation assistance, medication assistance and assistance with shopping, bathing, and cleaning are necessary for some members of the community.

Tresco - Tresco serves people ages 18 – 72 with disabilities throughout a three-county area. Most of the people served have needs related to developmental disabilities or have Autism Spectrum related needs.   Tresco provides early intervention and helps approximately 850 unduplicated children per year and 1,500 adults. Services provided by Tresco include a variety of therapies, a day shelter, group housing for up to four persons in a unit, long term home care for elderly and medically frail clients, client transportation, and food assistance. Tresco also operates a work program and other vocational services to help clients who can work.

Mental Health

Persons with mental health challenges also need a variety of supportive services tailored to their individual needs. Safe, affordable housing coupled with in-home medication monitoring, peer to peer support, social outings, therapeutic services, life-skills, and case management are all facets of the supportive housing needs of this population. As stated previously, two of the biggest gaps identified in Las Cruces by stakeholder interviews and community focus groups include mental health (including home-based) and substance abuse treatment.

The New Mexico Behavioral Health Institute (NMBHI) is the only state owned and operated psychiatric hospital in New Mexico. It is made up of five clinical divisions and serves a range of statewide behavioral health care needs. The hospital is located outside Las Cruces but within Dona Ana County and can provide treatment to residents of Las Cruces.

La Clinica de Familia has just begun to offer mental health services to low-income residents of Las Cruces.

Substance Use Disorders

Individuals with substance use disorders or who are dually diagnosed with mental health and substance use disorders may also need affordable quality housing with in-home and community based on-going case management and therapy. Individualized plans may involve medication monitoring, employment and/or vocational assistance and possibly other supports. Transportation is an important factor for all these mentioned populations. Providers noted a lack of substance abuse treatment options in Las Cruces as a barrier for many residents, and a needed addition to the community.

HIV/AIDS

People with HIV/AIDS with limited financial resources may need affordable, supportive housing to improve outcomes related to their physical and mental well-being. Lower income people with HIV/AIDS are more likely to receive necessary medical treatments and therapeutic and other social supports which aid recovery when access to quality housing is available.

At-risk Youth

Families and Youth Inc. **(FYI)** - Families and Youth Inc. works to help disadvantaged youth in a variety of ways. It operates permanent supportive housing which includes 12 units of supportive housing and serves justice involved and homeless youth. The program allows one to two teens per unit and has three family units for parenting teens. The agency also operates drug courts, child and adult food programs, summer food service, and a youth employment program. Other Families and Youth, Inc. programs include:

- **The JV Assessment and Reporting Center -** The JV Assessment and Reporting Center identifies and serves youth who are at-risk and system-involved. The program provides referrals to community resources, and support systems to address risky behaviors and reduce involvement in the juvenile justice system.
- **Children's Advocacy Center –** This program facilitates investigation, prosecution, intervention, and treatment of child abuse. FYI works with law enforcement, the judicial system, and protective services.
- **Family Navigation Education Services –** this program provides parenting and family support to prevent behavioral problems in children by enhancing the knowledge, skills, and confidence of parents.
- **The AmeriCorps Program -** the AmeriCorps Program identifies low performing schools and provides in school and after school and summer support for youth.
- **The Youth Empowerment Program** – The Youth Empowerment Program works typically with 16–24-year-olds and teaches soft skills, career skills, and places them in work sites across the county for paid work opportunities.

City of Las Cruces Juvenile Citation Program – The Juvenile Citation Program (JPO) is an alternative program for youth offenders who commit a misdemeanor, petty misdemeanor, or status offense. The citation is screened by JPO and a referral is made to the Citation Program when it is determined that the youth is appropriate for services. The program provides youth an immediate consequence to their offense and diverts them from the formal juvenile justice system.

Domestic Violence

La Casa Domestic Violence Shelter - a description of La Casa can be found in the Homeless Needs Section of this report.

Child Advocacy Center – The Child advocacy center at FYI conducts forensic interviews for suspected cases of abuse.

La Pinon- Rape Crisis Center – La Pinon Rape Crisis Center provides medical exams at the hospital, 24-hour crisis intervention, counseling services, outreach to schools, a Kid Talk phone program, and other children's advocacy services. La Pinon provides a representative at NMSU who is available for students and provides various therapies for participants. La Pinon also provides a program to assist the prison population.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The New Mexico Balance of State Continuum of Care (CoC), which includes Las Cruces, was developed knowing that people who are experiencing homelessness often do not always enter the system at a set point and institutional discharge planning is an important component of prevention. And ending the practice of discharging individuals to the streets or shelters is a priority of the City of Las Cruces 10 Year Plan to End Homelessness. The 2015 BOS CoC application outlines an effort to coordinate local and state corrections departments on a plan to provide state funded supportive housing for people with mental illness who are most likely to end up in jail or prison.

The State Linkages Program was designed for homeless people with a disabling behavioral health disorder and is funded by the New Mexico Mortgage Finance Authority/Behavioral Health Collaborative. In Las Cruces, the Mesilla Valley Community of Hope administers the program with Amador Health Clinic and La Clinica de Familia. In 2020, the program administered 37 vouchers, which provide permanent supportive housing for individuals with physical and behavioral health issues. Amador and La Clinica de Familia expect to add more vouchers to the Linkages program in 2021.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Program Year 2021 Public services funding to non-profit agencies to provide a variety of services including homeless services, emergency shelter for victims of domestic violence, childcare services, and advocacy for abused and neglected children and food rescue and distribution.

• Mesilla Valley Community of Hope will provide homeless day shelter services, housing assistance, mail, showers etc.

• Jardin de los Ninos will provide childcare services to homeless and near homeless children.

• Casa de Peregrinos will conduct food rescue to supplement their food distribution program.

• La Casa Inc will provide emergency shelter services for victims fleeing domestic violence.

MV CASA will provide case advocacy for abused and neglected children who are part of the foster care system in the 3rd district court system.

Mesilla Valley Community of Hope will assist approximately 530 persons. Jardin de los Ninos will assist approximately 220 children. Casa de Peregrinos will assist approximately 18,000 households. La Casa Inc will assist approximately 500 homeless victims of domestic violence. MVCASA will assist approximately 200 children.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Las Cruces has set goals to improve access to current programs for health and safety, information, transportation, and recreation services, and Enhance the quality and use of the physical infrastructure in Las Cruces, to better serve those with non-homeless needs.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

As part of the City's Affordable Housing Plan conducted by Community Strategies Institute in 2016, a detailed review of the City's land use policies and zoning codes were reviewed for potential barriers to affordable housing development and recommended changes to facilitate affordable housing development. Although the study did not find any egregious barriers to affordable housing creation in Las Cruces, the regulatory review resulted in several recommendations.

Issue 1: Lack of multi-family sites close to public transit and employment centers. While Las Cruces has significant unmet demands in both single family and multifamily affordable housing, the city has mainly focused on single family housing supply. Through the Consolidated Plan process and qualitative research, there is a high need for more affordable rental units, which could be met through multi-unit dwellings. A review of the building permits submitted from 2010 through 2020 revealed that 36 permits were issued for new multi-unit construction. Las Cruces' zoning ordinance includes the R-2, R-3, and R-4 multifamily districts, which are well designed to permit potential affordable developments. The R-4 district regulations, which include minimum density high enough to help support bus/transit service and no maximum density, is particularly well suited for use in constructing affordable multifamily units. Proactively up-zoning parcels into R-4 classification and multi-use classification will increase the number of parcels available for affordable developments.

Issue 2: Lack of smaller lot subdivisions which facilitate greater densities per acre. The Urban R-1aM zone allows for 5,000 square foot lot sizes. The Urban R-1bM allows for a minimum lot size of 3,500 square feet. On the 5,000 square foot the allowed density is eight units to the acre. On the smaller lot size, a density of 112 units per acre is allowed. The smaller lot configurations provide more development flexibility particularly in the infill overlay district because many of the older legacy lots are smaller than the lots platted in the new subdivisions in the city. In keeping with the smaller overall lot size, the City could consider allowing smaller minimum lot dimensions as well. In the older parts of the city, it may be feasible to have lots with narrower frontages. Many of the legacy lots have been planted with 25-foot frontages. In those areas, lots have been split and some existing homes have suitable sitting on 37.5-foot-wide lots. If a developer were to pursue an assemblage of the legacy lots, the narrower lot frontage may facilitate the placement of a few more homes on the same amount of ground. The greater density is allowed and by utilizing the greater permitted densities, lower land costs could enhance affordability of new detached units. The side setback requirements presently in place in the R-1aM and R-1bM zones allows flexibility. The side setback can vary between 0 and 5 feet depending on the development plan for the parcel.

Issue 3: Insufficient monetary resources for Impact Fee Deferral Program for Affordable Housing. Limit of 25 units annually is too low for larger multifamily developments. The City has adopted a Development Impact Fee Waiver Program for water, wastewater, public safety, and park impact fees to assist in lowering the costs of affordable housing development, both for rental and sale units. The Ordinance allows for the Community Development Department Director to approve waivers of impact fees which meet the requirements for affordability contained in the Ordinance. The Impact Fee Waivers may be granted for any of the impact fees currently assessed by the City. To manage the fiscal impact of the waiver program, the City has set forth provisions for alternative payment of the waived fees from sources other than the City Department impacted by the fee waiver. The present practice is for the City to set aside a budgeted amount in its General Fund budget to provide alternative payments for the waived fees. Based on budgetary limitations, the fee waiver has been budgeted to assist approximately 4 units per year. The Ordinance allows for the payment of the waived fees from other revenue sources beyond the City General Fund. The Fee Waiver Program Administrator could choose to backfill the waived fees from other sources including federal grant dollars.

Issue 4: Lack of use of incentives in Zoning Code/Comprehensive Plan to make denser rental housing more affordable for households with incomes less than 50% of AMI. Apply existing provisions for greater density and other non-cash incentives to incent developers to provide rental housing to the lowest income residents. More incentives, both monetary, fee waivers, and tax credits may help encourage developers to build denser affordable rental units.

Issue 5: Limited use of Accessory Dwelling Unit Ordinance (ADU) to create more dwellings on existing lots. By changing the zoning and building code ordinances to allow ADUs for non-family households and alternative types of housing, such as tiny homes or containers, more affordable units may become available.

Issue 6: Lack of smaller lots for single family homeownership development. Since there is a supply of land zoned appropriately for medium density and high-density multifamily development, the supply of land is not considered a constraint for the expansion of the affordable rental housing supply. While there is a supply of lots suitable for single family detached ownership development, the City could encourage new subdivisions to include a greater number of smaller lots as a way of lowering the cost of new ownership units for low- and moderate-income households.

Issue 7: Lack of compact development with population to support commercial uses in Downtown Business District. Elevate Las Cruces comprehensive plan encourages the development of mix-use buildings. The City of Las Cruces can encourage developers to build mixed use commercial and residential units through cash and non-cash incentives, such as impact fee waivers and tax credits.

Issue 8: Parking requirements that drive higher percentages of land devoted to car parking. In addition to the various development regulations, on-site parking requirements can also impact the development cost of affordable housing. Currently the City requires two on-site parking spaces for most residential, detached units. There is some flexibility in the requirements for attached rental and for sale units. The standard for those types of units is 1.5 to 2.0 spaces per dwelling unit. There are further reductions in parking requirements for facilities which house elderly clients or those with disabilities. Generally, those types of residential land uses allow for a parking ratio of less than one parking space per unit or bed, depending on the configuration of the facility. By encouraging multi-unit development near public transit and developers imposing restrictions on the number of parking spots, more land may be used for housing versus parking in Las Cruces.

Issue 9: Lack of guidance that would allow for narrower road widths and other innovative techniques that would lower onsite and offsite infrastructure costs for new denser development. The City is convening a task force to address infrastructure regulations and requirements that could help lower costs for developers and ultimately homeowners.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

According to American Community Survey 2019 1-Year Estimates, the Las Cruces Labor Force comprises 51,244 individuals, with an unemployment rate of 5.0 percent. Young people in Las Cruces are more likely to experience unemployment, with 8.8 percent of persons age 16-24 experiencing unemployment. Approximately 7.4 percent of adults aged 25-65 are unemployed.

Due to the COVID-19 pandemic in Las Cruces where many businesses were forced to shut down, the unemployment rate reached record highs. It is estimated the overall unemployment rate may have risen as high as 13.0 percent in July 2020 but has since fallen by nearly half to 7.1 percent as of November 2020. Many community stakeholders interviewed for this analysis emphasized the need for good jobs and a livable wage as a necessity for low-to-moderate income Las Cruces residents. They also expressed that the full scale of the COVID-19 pandemic on the economic landscape in Las Cruces will not be fully known for some time.

Economic Development Market Analysis

The following table indicates the share of jobs and share of workers in Las Cruces. The most common business sector in the city is Education and Healthcare services, followed by Retail Trade and Professional, Scientific, Management Services. The least common business sectors/shares of workers in the city are Information and Wholesale Trade.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs less workers
Agriculture, Mining, Oil & Gas Extraction	1,041	2,868	2.2%	4.9%	-2.7%
Arts, Entertainment, Accommodations	3,199	1,089	6.8%	1.9%	4.9%
Construction	3,443	4,046	7.3%	6.9%	0.4%
Education and Health Care Services	16,345	25,605	34.7%	43.8%	-9.1%
Finance, Insurance, and Real Estate	1,411	1,910	3.0%	3.3%	-0.3%
Information	320	456	0.7%	0.8%	-0.1%
Manufacturing	1,605	2,897	3.4%	5.0%	-1.6%
Other Services	2,193	1,240	4.7%	2.1%	2.5%
Professional, Scientific, Management Services	5,577	3,872	11.8%	6.6%	5.2%
Public Administration	3,614	2,930	7.7%	5.0%	2.7%
Retail Trade	6,331	7,913	13.4%	13.5%	-0.1%
Transportation and Warehousing	1,643	2,198	3.5%	3.8%	-0.3%
Wholesale Trade	387	1,411	0.8%	2.4%	-1.6%

Total	**47,109**	**58,435**	--	--	--

Table 45 - Business Activity. SOURCE: 2019 ACS 1-Year Estimates, 2019 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	48,764
Civilian Employed Population 16 years and over	45,826
Unemployment Rate	3.5%
Unemployment Rate for Ages 16-24	17.9%
Unemployment Rate for Ages 25-65	6.7%

Table 46 - Labor Force
Data Source: 2019 American Community Survey

The 2019 American Community Survey projected the Las Cruces Unemployment Rate to be 3.5%, but the most recent US Bureau of Labor Statistics report (November 2020) estimates the Las Cruces unemployment rate is 7.1 percent.

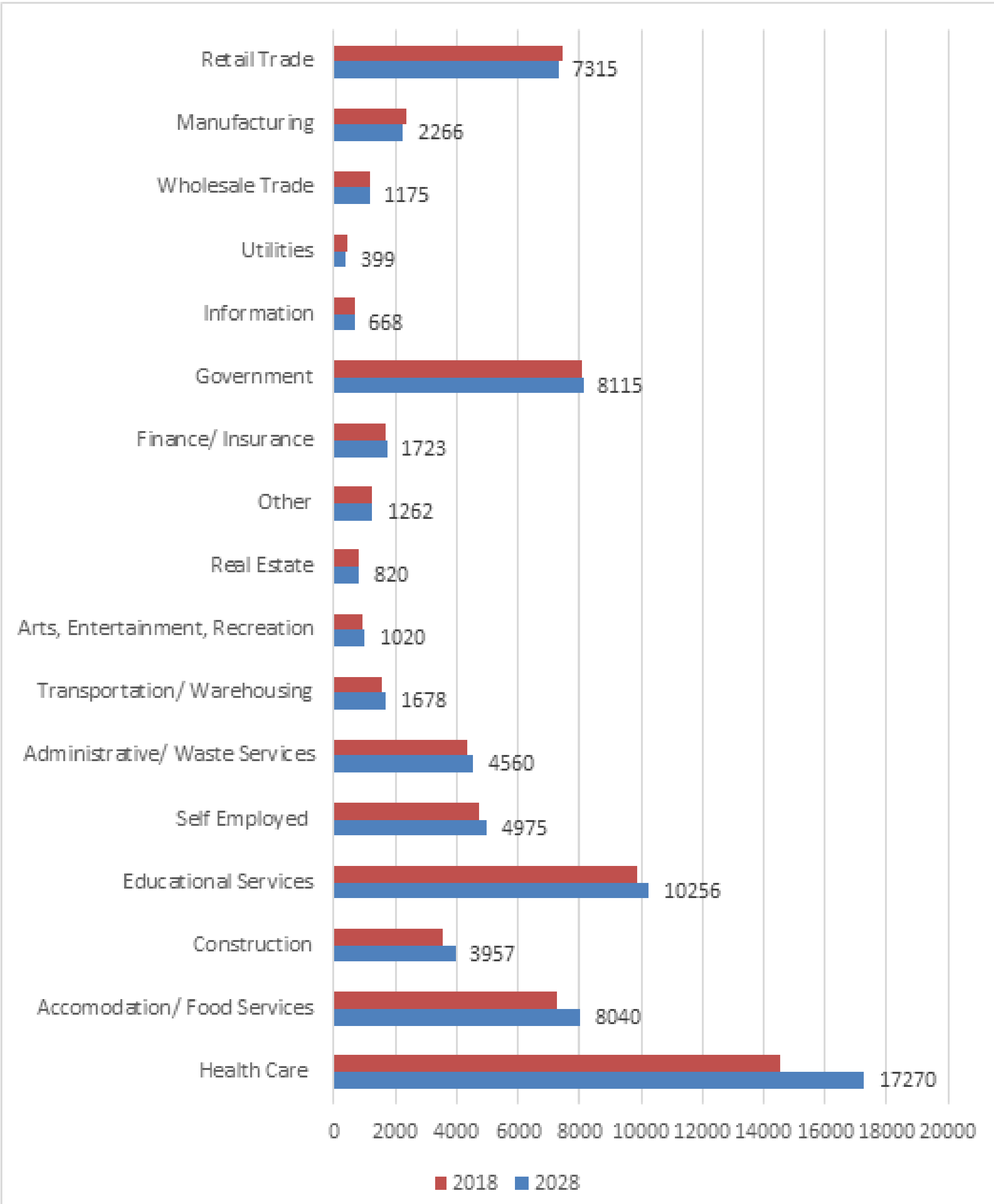
Occupations by Sector	**Number of People**
Management, business and financial	18,895
Farming, fisheries, and forestry occupations	355
Service	8,515
Sales and office	11,653
Construction, extraction, maintenance, and repair	3,708
Production, transportation, and material moving	3,983

Table 47 – Occupations by Sector
Data Source: 2019 American Community Survey

The leading occupations by sector in Las Cruces are Management, Business, and Financial. Construction, Farming, Fisheries and Forestry occupations are the lowest. Another lower represented occupation is Construction, extraction, maintenance and repair, which is in line with what many key stakeholders expressed in interviews: there is a lack of properly licensed and bonded tradespeople in Las Cruces.

The fastest growing industry in Las Cruces is Health Care and Social Assistance, followed by Construction. The industry experiencing the lowest rate of growth is Retail Trade, which, along with Wholesale Trade and Information lost growth over the past 10 years.

The graphic below shows the projected industry employment growth in the Las Cruces MSA from 2010 – 2020.



SOURCE: https://www.dws.state.nm.us/en-us/Researchers/Data/Employment-Projections

Figure 9: Occupational Wages

The highest average wages in Las Cruces are in the fields of Management, Architecture and Engineering, and Healthcare Practitioners. The fields averaging the lowest annual incomes are farming, fishing, and forestry occupations, and food preparation.

Salary by Employment Sector

Sector	Entry Salary	Average Salary	Experienced Salary
Business and Financial Operations	$36,060	$60,880	$73,290
Management	$47,150	$89,510	$110,700
Computer and Mathematics	$34,400	$68,460	$85,490
Architecture and Engineering	$48,950	$79,620	$94,950
Life, Physical, and Social Science	$40,660	$69,710	$84,240
Community and Social Service	$28,820	$47,900	$57,450
Legal	$35,490	$76,630	$97,200
Education, Training, and Library	$21,220	$52,390	$67,970
Arts, Design, Entertainment	$30,800	$53,430	$64,740
Healthcare Practitioners and Technical	$39,560	$82,770	$104,380

Healthcare Support	$18,160	$24,240	$27,290
Protective Service	$25,470	$49,140	$60,970
Food Preparation	$17,910	$22,460	$24,740
Building and Grounds	$18,430	$24,420	$27,410
Personal Care and Service	$18,190	$29,660	$35,400
Sales	$19,980	$30,800	$36,210
Office and Administrative Support	$21,230	$32,320	$37,870
Farming, Fishing and Forestry Occupations	$17,800	$23,250	$25,970
Construction and Extraction	$25,610	$39,210	$46,000
Installation, Maintenance, and Repair	$24,110	$40,990	$49,420
Production Occupations	$21,020	$35,150	$42,210

Transportation and Material Moving Occupations	$21,130	$30,080	$34,550

SOURCE: Bureau of Labor Statistics

Most Las Cruces residents travel less than 30 minutes to work each day. Accessibility of public transportation is a barrier for many low-income households in accessing transit to jobs and housing, especially for those individuals who may work outside the normal public transit hours. A desire for communities to be more walkable for families and children was expressed by many key stakeholders.

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	36,872	84%
30-59 Minutes	5,541	13%
60 or More Minutes	1,388	3%
Total	***43,801***	

Table 48 - Travel Time
Data Source: 2019 ACS 1-Year Estimates

Approximately 27 percent of the Las Cruces labor force has a high school degree or less. Fifty five percent of the Las Cruces unemployed population has a High School degree or less. Job training and placement programs for these residents could reduce the unemployment rate for less educated workers.

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	2,609	411	2,710
High school graduate (includes equivalency)	5,761	1,155	2,610
Some college or associate degree	12,389	543	3294
Bachelor's degree or higher	13,059	731	2,395

Table 49 - Educational Attainment by Employment Status
Data Source: 2019 ACS 1-Year Estimates

Many Las Cruces residents without a high school diploma are older than 24-years-old and have limited job options that will pay a living wage. Job training programs must target residents in all age groups.

Educational Attainment by Age

	Age				
	18–24 yrs	**25–34 yrs**	**35–44 yrs**	**45–65 yrs**	**65+ yrs**
Less than 9th grade	152	614	695	1,702	2,869
9th to 12th grade, no diploma	1,483	215	555	1,949	911
High school graduate, GED, or alternative	3,560	3,978	1,159	4,389	3,047
Some college, no degree	6,675	4,986	2,000	3,602	3,022
Associate degree	2,927	2,683	1,069	1,886	934
Bachelor's degree	2,085	3,929	1,889	3,481	2,458
Graduate or professional degree	264	2,037	1,570	3,279	2,697

Table 50 - Educational Attainment by Age
Data Source: 2019 ACS 1-Year Estimates

Residents with the most education also earn the most in Las Cruces. Persons with a bachelor’s degree earned 73 percent more than those with just a high school education.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	**Median Earnings in the Past 12 Months**
Less than high school graduate	13,588
High school graduate (includes equivalency)	19,942
Some college or associate degree	30,237
Bachelor's degree	34,637
Graduate or professional degree	57,486

Table 51 – Median Earnings in the Past 12 Months
Data Source: 2019 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors in Las Cruces are Education and Health Care Services, Arts, Entertainment and Accommodations, and Retail Trade.

Describe the workforce and infrastructure needs of the business community:

Key informants and staff from the Las Cruces Economic Development Department state a lack of jobs, especially those paying a living wage, as the biggest workforce and infrastructure need of the business community in Las Cruces. The City is focusing on growing locally owned businesses to take advantage of local skills and talent.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City is promoting incentive programs such as Wage Plus to encourage employee training and development in the City. The City plans to start a business incubator program to encourage and support new businesses started in Las Cruces that can increase local employment. The City is also planning to promote the area to the film industry and grow the capacity of Las Cruces to attract film projects to Las Cruces.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

There is a lack of higher-paying jobs for skilled labor in Las Cruces.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The City of Las Cruces collaborates with Economic Development Partners like the Greater Las Cruces Chamber, the Hispanic Chamber, the Green Chamber, as well as Dona Ana County and the Mesilla Valley Economic Development Alliance.

The Bridge of Southern NM is a program for the enhancement of career readiness and workforce development to boost the region's future economic prosperity. Their goals are achieved primarily through bridging the gap between skills and knowledge within New Mexico’s Education System.

Elevate Las Cruces, the city’s new comprehensive plan, includes a detailed economic development analysis. The following observations were made:

The jobs-housing balance in Las Cruces is below the recommended target range, although a high percent of the City’s labor force commutes from other jurisdictions.

Other conclusions from Elevate Las Cruces include:

- High percentage of imported labor may reflect limitations in housing choice.
- Las Cruces has used creative investment tools such as Tax Increment Development Districts and Qualified Opportunity Zones to encourage redevelopment and reinvestment in certain areas of the City.
- The City's Infill Area Overlay District has not generated a substantial increase in commercial development activity in center city as opposed to other areas.
- Most major employment is within public sector agencies and organizations.
- Business recruitment by the City and other local and regional agencies (e.g. NMSU, MVEDA, DAC, BRIDGE, LCPS) is not clearly focused on targeted industry sectors.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

See above summary about the Elevate Las Cruces comprehensive plan.

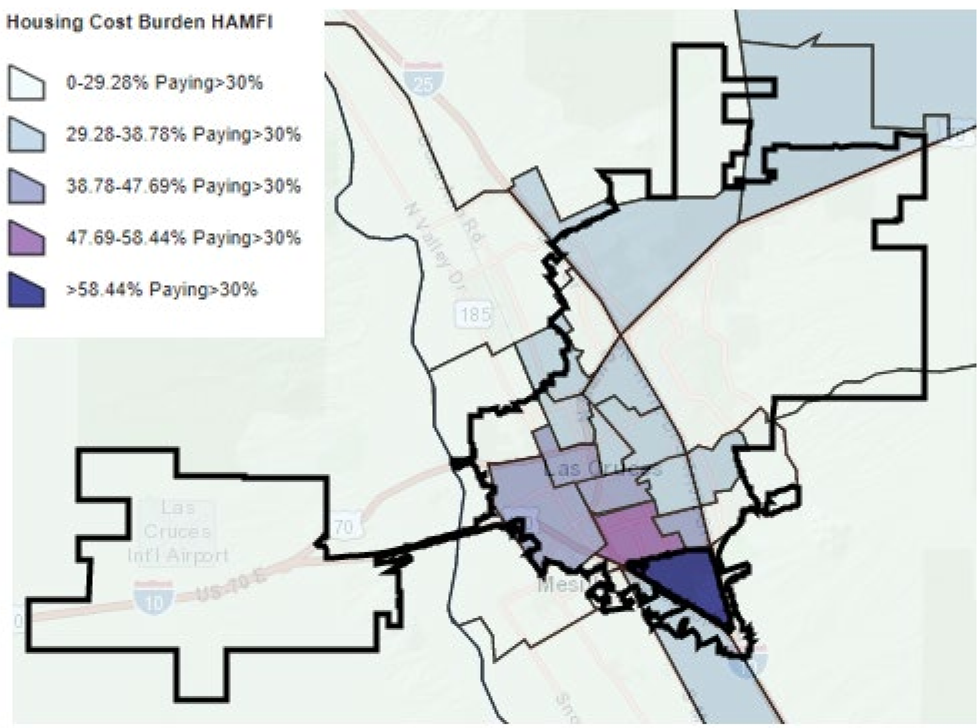
MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. R/ECAPs must have a non-white population of 50 percent or more and a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

Las Cruces considers there to be a “concentration” of a certain population group or characteristic if that group or characteristic is found to be at least 40% more than in other areas, following the definition found in the new AFFH analysis of poverty concentrations for racially/ethnically concentrated areas of poverty (R/ECAPs).

Households with One of Four Housing Problems

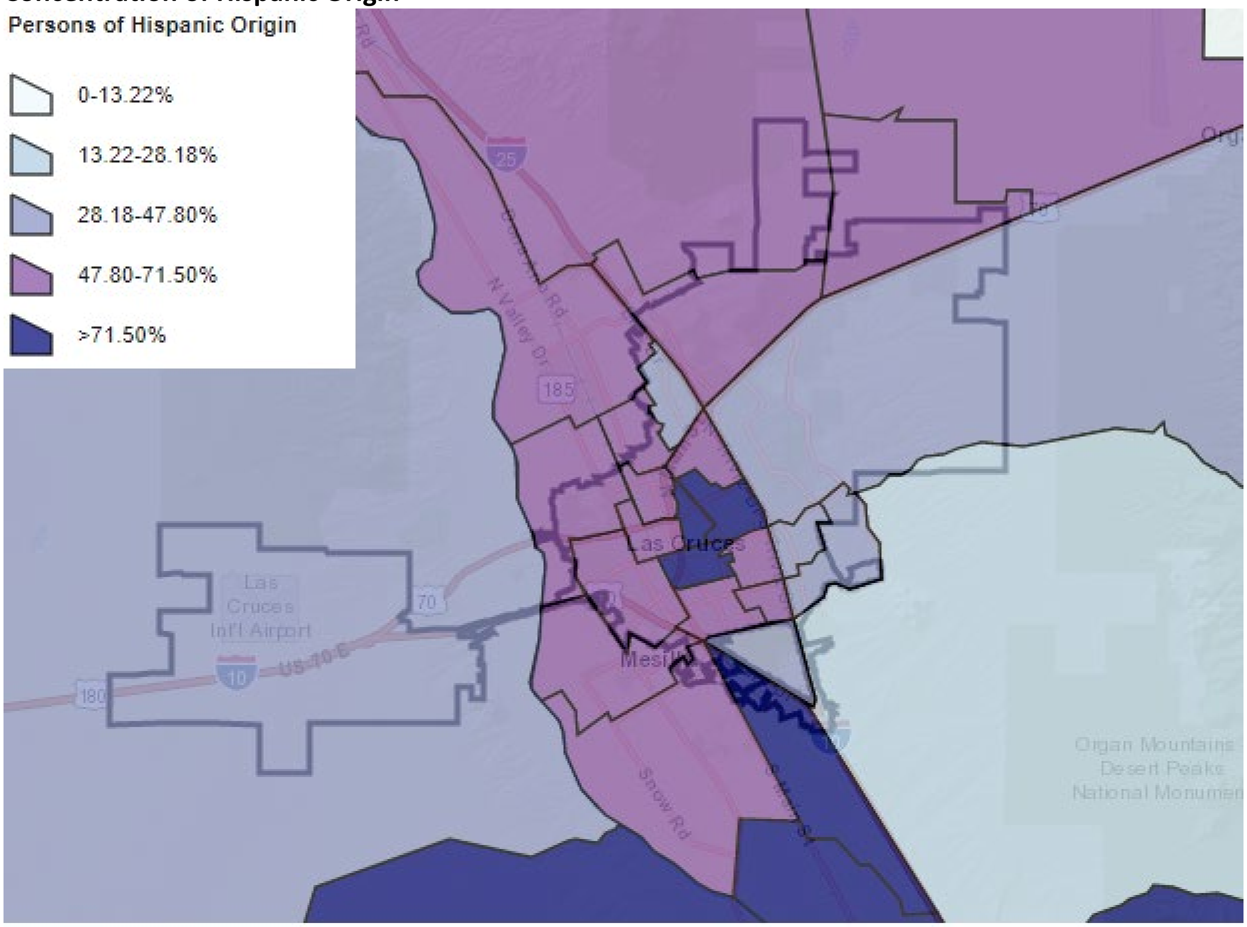


Source: CPD Maps

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The following map shows the concentrations of Hispanic households in Las Cruces. City-wide, 51.7% of households are Hispanic or Latino. It is not surprising, then, to see that 61.5% of census tracts within the City (16 of 26) have more than 50% of residents are Hispanic or Latino. Areas shaded in purple or dark purple indicate greater than 50% Hispanic household concentration.

Concentration of Hispanic Origin



Source: HUD CPD Maps

While many census tracts have more than 50% Hispanic population, there are just two that meet the R/ECAP threshold of 50% non-white and having a poverty rate of 40% or more, or three times or more the average tract poverty rate for the Las Cruces MSA. HUD has recently developed a data and mapping tool that identifies these “R/ECAP” census tracts based on 2019 census data. In Las Cruces, there are two R/ECAP tracts – 4.01, and 6.00.

What are the characteristics of the market in these areas/neighborhoods?

According to the HUD AFFHT data system, 77.98% of households in tract 4.01 were of Hispanic origin, 77.12% of households in tract 6.00 were of Hispanic origin.

Are there any community assets in these areas/neighborhoods?

Yes, tracts 4.01 and 6.00 are in central Las Cruces, and are close to many services and amenities. These tracts are also located near more public transportation than other areas of the City.

Are there other strategic opportunities in any of these areas?

Yes, there are opportunities for revitalization, housing rehabilitation and housing construction in Central Las Cruces, near the University, on vacant lots in existing subdivisions, and on in-fill sites within the central City.

MA-60 Broadband Needs of Housing Occupied by Low- and Moderate-Income Households – 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

One hundred percent of Las Cruces' geography has access to Broadband Internet, with 81.0 percent of households having an internet subscription, a slightly higher percent than the Dona Ana County average (78.9%). The average speed test result in Las Cruces is 95 Mbps, the best rate in the state.

According to Broadband Now, small households with one to two individuals need download speeds of at least 25 Mbps. For larger households of four or more or individuals looking to work from home, speeds of at least 100 Mbps are ideal.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Las Cruces has a total of 13 internet providers, with eight offering residential service. Of those 13, four are Fiber providers, two are Cable Internet providers, three are DSL providers, two are Fixed Wireless providers and two are Satellite providers. Introductory rates for internet access in Las Cruces range from $20 to $90 monthly, depending on service provider and download speed.

ZIP Code 88001, which comprises Las Cruces City Hall, Las Cruces High School, and the majority of Las Cruces' downtown core, has the best download speed in the city.

MA-65 Hazard Mitigation

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Urban heat occurs in areas with large amounts of asphalt and concrete that absorb the sun's energy, radiate it out as heat, and raise surrounding air temperatures. This can affect residents outside and inside their homes. Urban heat is a product of historic and traditional urban planning that ignored the importance of green space and quality homes. Climate change is not the cause of urban heat, but it can make conditions worse.

The City has worked with the National Aeronautics and Space Administration (NASA) and National Oceanic and Atmospheric Administration (NOAA) to measure urban heat through surface and ambient temperature, respectively. Both studies (NASA DEVELOP, 2017. CAPA Strategies, 2020) found that:

- By midafternoon major intersections and the low- and moderate-income areas in the infill or older part of the town experienced temperatures 10-13°F warmer than the more affluent areas.

A Climate Modeling study (LeRoy and Garfin, 2017) projected that Las Cruces will experience the following natural stressors and shocks:

- Extreme Heat: Las Cruces will experience higher temperatures often and for longer periods of time. By 2050, Las Cruces may experience seven weeks of extreme heat with temperatures over 100°F, with at least three of these weeks with temperatures over 105°F.
- Drought: Higher temperatures increase evaporation. Although the City uses groundwater for drinking, surface water losses will have a great impact on agriculture, a large part of the economy.
- Flooding: Drought decreases infiltration, heavy rainfalls of over 2" – not unheard of in the summer- can cause flash floods creating major erosion, sediment loading, and test the integrity of dams. The runoff is so rapid many areas do not benefit from the rain.
- Winds: Winds carry all sorts of pollutant 100's of miles. For children under five, seniors over 65, and those with chronic disease, these winds can be debilitating. The lack of visibility is a traffic hazard, lowers solar (PV) generation, and keeps people from enjoying our natural resources.
- Fire: The smoke from neighboring western states has traveled into the Las Cruces area for weeks at a time.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The impacts from urban heat and climate change extreme heat events may disproportionately impact certain populations more than others. According to the National Integrated Health Heat Information System (NIHHIS, 2021) the following factors put individuals at risk during extreme heat conditions:

- Household composition (e.g., children under 5 or over 65)
- Chronic health conditions (e.g., diabetes, asthma, cardiac problems)

- Economic status (e.g., low income, fixed income, health care)
- Housing and transportation (e.g., substandard housing)
- Exposure, (e.g., outdoor workers, athletes, individuals experiencing homelessness; and
- Ethnicity (language barriers, cultural practices).

Thermal comfort and safety. Homes with minimal insulation, single pane windows, concrete construction, limited cross ventilation, old or poorly maintained evaporative coolers, and leaking ducts are just some of the many factors that interfere with thermal comfort and ultimate safety. From a targeted survey (LaRocque, unpublished) of one inner city LMI neighborhood (with a 26 % response rate), several heat experiences were illuminated:

- 77% were bothered by extreme heat.
- 67% sweated heavily; 50% had headaches; 45% felt weak; 45% had muscle cramps.
- 43% attribute the above symptoms to the house not being cool; 38% to working outside; and 25% to health issues.
- 34% rent their home.
- 75% of the households used evaporative coolers.
- 33% went to another place to cool off such as a shopping mall or grocery store for 1-4 hours.
- 79% reported that they had 0 (39%) or 1-2 (40%) family members or friends in the neighborhood that they could call if they needed help.
- 20% of potential households that may be at risk due to household composition, (7% with children under 5; 6% with couples over 65 years old; and 7% of households with adults over 65 years old living alone.)

Much of this data is accompanied by anecdotes and observations that encourage further concern. Evaporative coolers perform best in arid conditions; however, summer extreme heat events can occur during the monsoon season, limiting the efficiency of coolers to just a 10°F drop in temperatures. With unreceptive landlords, renters must work with legal aid delaying response time by three months. During the pandemic, cool centers and commercial operations were either closed or not conducive to gathering. Neighborhoods with limited social cohesion are more likely to be impacted by extreme weather events that neighborhoods that have strong connections.

Given this initial evidence climate change projections, and clean energy technologies must be incorporated in LMI housing and neighborhood planning to address the increasing vulnerabilities and inequities that Las Cruces LMI populations continue to face.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Las Cruces Strategic Plan identifies the priority needs in the City and describes strategies the City will undertake to serve the priority needs. The sections of the Strategic Plan include: Geographic Priorities; Priority Needs; Influence of Market Conditions; Anticipated Resources; Institutional Delivery System; Goals; Public Housing; Barriers to Affordable Housing and strategies to ameliorate those barriers; Homeless Strategy; Lead Based Paint Hazards; and an Anti-Poverty Strategy.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Geographic Area (view/add)

Sort*	Area Name	Area Type	Include	Action
1	Citywide	Other		Edit | View

Table 52 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Las Cruces does not target funding or programs to specific geographies within the City. Funds are allocated based upon need, priorities, and goals.

The City's primary method of allocating CDBG and HOME dollars is to assist low to moderate income and special needs populations. To the extent that specific geographic areas have greater needs than other areas in the City and/or if service and housing organizations are in certain areas, they will receive a larger proportionate share of the funding. For sidewalk improvements, the City will focus on the geographic areas where sidewalks, curb cuts and related ADA accommodations are lacking. Finally, to provide affordable rental and single-family housing, the City's dollars will be allocated in areas of new development where affordable housing is lacking and/or infill areas that can accommodate affordable housing

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 53 – Priority Needs Summary

1	**Priority Need Name**	Housing Needs
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Persons with HIV/AIDS Unaccompanied Youth Disabled Single Parents
	Geographic Areas Affected	Within Jurisdiction
	Associated Goals	**Low- to moderate-income residents will have access to safe, decent, and affordable housing** **Prevent and reduce homelessness**

	Description	Goal: Low- to moderate-income residents will have access to safe, decent, and affordable housing. Potential strategies include, but are not limited to: • Voluntary Rental unit registration and inspection program • Reduce landlord stigma around Housing Voucher programs • Develop property maintenance code policies • Preserve existing affordable housing options • Assistance program for renters for safety and sanitary improvements to units in code violation • Provide incentive programs to develops to encourage building of multiunit • Ensure ADA accessible housing are available • Provide incentives and/or programs to help homeowners modify units for accessibility • Develop preservation and rehab programs to maintain seniors in owner-occupied housing • Acquire land to be designated for low-income affordable housing projects • Provide Fair Housing education to all landlords, realtors, and city and non-profit organizations that work in housing • Develop a city-wide Fair Housing PSA campaign • Centralized location for all Fair Housing complaints • Provide credit and first-time homebuyer education to help minority populations reach homebuyer goals • Representation on the MFA board and statewide housing committees • Lobby state for more funding for projects in southern NM
	Basis for Relative Priority	Overall, the biggest need mentioned by providers in community stakeholder interviews, community focus group meetings, and the community survey was for additional affordable housing units for very low-income households, accessible units for those with physical disabilities, transitional or permanent housing for persons experiencing homelessness and/or mental health/substance use disorders.
2	**Priority Need Name**	Community Services (Public Services)
	Priority Level	High
	Population	Extremely Low Low

crescendo

City of Las Cruces
MOUNTAINS OF OPPORTUNITY

		Moderate Large Families Families with Children Elderly Chronic Homelessness Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and Their Families Victims of Domestic Violence
	Geographic Areas Affected	Within Jurisdiction
	Associated Goals	**Improve access to current programs for health and safety, information, transportation, and recreation services**
	Description	Goal: Improve access to current programs for health and safety, information, transportation, and recreation services. Potential strategies include, but are not limited to: • Increase awareness about available services in the community • Provide free or low-cost services to qualified individuals • Increase capacity and access to case management • Increase mental health services and support for isolated seniors (COVID-19 impact) • Expand current substance use and mental health services available • Increase access to quality childcare centers in the community
	Basis for Relative Priority	The COVID-19 Pandemic has placed increased strain on service providers, and behavioral health acuity is up nationwide. There is great need for easy access to community services that serve large swaths of the population. Additionally, the

		need for recreation is greater than ever, with social isolation and lack of community activities.
3	**Priority Need Name**	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Public Housing Residents Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and Their Families
	Geographic Areas Affected	Within Jurisdiction
	Associated Goals	**Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development.**
	Description	Goal: To enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development. Potential strategies include, but are limited to: • Support the development of job skills training for youth, workforce development and job creation • Job skills training – nurse education training (COVID-related) • Financial literacy education for youth and adults • Provide small business support and education • Provide small business grants and/or resources (i.e., shared workspace, technology, etc.) • Ensure city policies and regulations are business-friendly

		• Develop city infrastructure to meet the needs of area industries and to help attract new industries
	Basis for Relative Priority	Las Cruces has all the structures in place to be a desirable place for business and families to grow and thrive. An international airport, a state-of-the-art business park, a University, and new medical school, and geographic proximity to major industry. Providing incentive to continue growth in Las Cruces can potentially provide a boost to all citizens. l
4	**Priority Need Name**	Community and Public Facilities
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and Their Families
	Geographic Areas Affected	Within Jurisdiction
	Associated Goals	**Enhance the quality and use of the physical infrastructure in Las Cruces**
	Description	Goal: Enhance the quality and use of the physical infrastructure in Las Cruces. Potential strategies include, but are not limited to: • Develop and/or improve youth centers and recreation facilities • Expand bus route hours in the evenings and weekends • Ensure bus routes are tied to housing and areas of employment • Build more bus stops
	Basis for Relative Priority	Many community leaders and stakeholders have expressed the need for greater infrastructure to serve the diverse communities in Las Cruces. Improved transportation and facilities will increase flow throughout the city, allowing Las Cruces residents of all types to more easily access services.

5	**Priority Need Name**	Public Improvements and Public Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Non-Housing Community Development Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and Their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Within jurisdiction
	Associated Goals	**Enhance the quality and use of the physical infrastructure in Las Cruces**
	Description	Goal: To enhance the quality and use of the physical infrastructure in Las Cruces. Potential strategies include, but are not limited to: • Increase the number of sidewalks and bike lanes • Increase green space

		• Increase downtown revitalization • Casa de Peregrinos Campus Expansion
	Basis for Relative Priority	Enhancing existing services will allow the City to help community service providers serve more residents more efficiently. Focusing on greenspace and revitalization will address the needs many key stakeholders identified as they relate to improving quality of life in Las Cruces.
6	**Priority Need Name**	Homeless Needs and Services
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Homeless Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Use Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Within jurisdiction
	Associated Goals	**Prevent and reduce homelessness.**
	Description	Goal: Prevent and reduce Homelessness. Potential strategies include, but are not limited to: • Support the expansion of beds for domestic violence shelters • Support the expansion of wraparound services for domestic violence victims • Provide vouchers and assistance for those transitioning from shelters to more permanent housing

		• Increase awareness of current programs and services • Increase awareness of current programs and services • Enhance referral services • Support the expansion of transitional housing and emergency shelters in Las Cruces • Reduce landlord stigma of housing voucher programs • Increase case management
	Basis for Relative Priority	Those who are experiencing repeated episodes and/or chronic homelessness are the hardest to provide consistent housing in the City of Las Cruces. Because of economic conditions and the lack of decent, affordable housing, there are other households which face a first or second experience of losing their housing.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics That Will Influence
The use of funds available for housing type	
Tenant Based Rental Assistance (TBRA)	Demand outstrips the supply of subsidized, accessible affordable rental units. TBRA will provide a bridge for those seeking a HCV or a Public Housing unit but can't obtain one because of the long waiting lists.
TBRA for Non-Homeless Special Needs	Special needs households often have poverty level incomes and because of long waiting lists for assisted housing, TBRA can provide an interim term of two years while those households move up on PHA waiting lists.
New Unit Production	The City of Las Cruces provided funding for the Desert Hope, a 40-unit permanent supportive housing that was recently completed. The numbers of rent burdened households indicate the tight market for affordable rentals. With the short supply of affordable units in the Las Cruces rental market, any new affordable units constructed that are targeted to the lowest income will be absorbed rapidly in the current market. Additionally, the COVID-19 pandemic has only exacerbated the need for more affordable, quality rental units in Las Cruces.
Rehabilitation	A significant number of homes in Las Cruces are more than thirty years old. Many of these homes are occupied by households with limited incomes that prevent them from making the necessary health and safety improvements to antiquated systems. With upgrades to basic systems, these homes will remain livable and will also represent affordable purchase opportunities for future first homebuyers.

Table 54 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

HOME Investment Partnerships grant program has flexibility to assist in housing programs; participating jurisdictions decide how to use money for: Acquisition, Rehabilitation, New Construction, Tenant Based Rental Assistance (TBRA), Home Buyer Assistance, Planning, and Operating Assistance for CHDOs. For 2021, the City anticipates it will receive $491,071 of HOME Entitlement funds. The City anticipates receiving approximately $55,000 in estimated program income from previous Home Rehabilitation projects that are paying off their mortgages or other HOME projects (rental properties) with loans that require repayment to the City’s HOME Program. This will give the City’s 2021 HOME Program a full funding amount of $546,071.

With the CDBG program funds may be used to address neighborhood revitalization, economic development, provisions of improved community facilities, prevention and elimination of slums or blight, and activities aiding low- and moderate-income families. For 2021, the City anticipates receiving $1,014,641 of CDBG Entitlement funds and an anticipated $35,000 of program income from houses which have been previously rehabilitated. With a prior year CDBG resource value of $191,000 This will give the City's 2021 CDBG Program a full funding amount of $1,240,641.

The City has an Affordable Housing Land Bank and Housing Trust Fund with approximately $500,000 in funds available for implementation in accordance with the City’s Affordable Housing General Oversight Ordinance once the City has a written Affordable Housing Plan approved by MFA. Other efforts include an impact fee waiver program for developers of affordable housing in the City of Las Cruces (approximately $25,000 in value).

Las Cruces has a local Health and Human Services funding source for health-related public services. The annual amount available for allocation is $400,000.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	1,014,641	35,000	191,000	1,240,641	4,058,564	CDBG funding is used for a variety of programs and projects in Las Cruces. Prior Year Resources are excess program income.

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	491,071	55,000	0	546,071	1,964,284	HOME funds are used for both homeownership and rental housing projects and programs. Prior Year Resources is excess program income.

Other	public - local	Acquisition Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership	500,000	0	0	50,000	2,000,000	The Affordable Housing Trust Fund dollars are used for affordable housing related projects.
Other	public - local	Housing	25,000	0	0	15,000	100,000	The City providers impact fee waivers for specific projects.

Other	public - local	Public Services	400,000	0	0	300,000	1,600,000	These funds are used to provide public service funding to a variety of human service organizations working in Las Cruces.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

HOME and CDBG funds will leverage additional resources including Low Income Housing Tax Credit funding (multi-family years,) private investors, private donations, and local funds.

The HOME funds generally require a match of local monies; however, through CPD Notice 07-05, issued July 11, 2007 and expiring July 11, 2008, the City's HOME match percentage had been waived or reduced by 100% from PY 2004 through PY 2014. The HOME funds normally require a 25% match; however, due to federal guidelines for HOME match waivers, the City of Las Cruces currently receives a 100% reduction in match liability waiver for Federal fiscal year 2020 and we assume there will be a match reduction for 2021-2025 as well. Match requirements will be satisfied through various sources to including TBRA supportive services, local loan amounts in conjunction with MFA Mortgage Revenue Bond Program, volunteer labor and sweat equity, amounts discounted from sales prices of land to value amount for lot purchases for affordable housing development and other non-federal sources. The City currently has 1,120,091.48 in excess match contributions.

The City requires a CDBG match of 50% for infrastructure programs as of 2015.

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

Public owned land and facilities are used for homeless services including, medical, childcare, homeless day shelter, food services, meals, and victims of domestic violence emergency shelter and services. Additionally, public owned land or the proceeds from the sale of public owned land may be used for the development of affordable housing.

Discussion

1. Due to limited funding, the City of Las Cruces will require that no more than $200,000 of HOME funds, starting in Program Year 2016, may be dedicated to a single project (but not necessarily one single agency in one program year). Should the dedication or financing of a land bank and trust fund be established, the City may evaluate and update this policy as appropriate

2. Due to limited HOME funding each program year, the City of Las Cruces will alternate the priority between dedicating HOME funds between affordable rental housing development and single-family homeownership developments. Starting in Program Year 2017, funding will be priority to affordable rental housing development and continue in odd numbered years (2019). Single family housing development will receive priority in even numbered program years (2016, 2018, 2020). However, given the number, type, and quality of applications for funding and any undedicated funds available, HOME funds may be provided to the other priority in any given year.

The City of Las Cruces requires that no more than 50% of CDBG funds may be dedicated to infrastructure, public facilities, or economic development activities that result in capital or facility improvements and that the remaining 50% or more may come from other sources. Other sources can include other federal, state, local, and private funds. For improvements made to City-owned facilities that are occupied by non-city operated programs, the other 50% must come from other federal, state and private (non-City of Las Cruces) sources or will provide full funding from CDBG funds with 50% of the funding provided as loan, resulting in program income upon payback.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Housing and Neighborhood Services Section of Economic Development	Local Government	Lead coordinating and administrative agency for housing, homeless and supportive service agencies serving the jurisdiction	Las Cruces jurisdictional boundaries.

Table 56 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

While Las Cruces residents benefit from an institutional structure which can provide needed supportive services to those who need them, the continued pressure on resources from both the federal and local level are making it difficult to respond to increased demand. The COVID-19 pandemic has affected many households across the country and in Las Cruces. With the closing of nonessential businesses and job losses in the community, many households, especially low-income households, have struggled more than ever to pay rent, utilities, and food costs. Many households may be on the brink of homelessness at any given moment. Thanks to a national eviction moratorium and federal and state rental/mortgage assistance programs, households struggling financially due to the pandemic can receive the help they need to stay in their homes. However, as eviction moratoriums lift and rental/mortgage assistance program funds run out, there could be a rapid increase of homeless individuals in the community.

All of the service delivery agencies in Las Cruces report that they see increased demand for their services. To some extent, the ability to expand the service delivery system is dependent on greater resource availability. This is a challenging situation because the fiscal pressures on local government make it difficult for local government to simply allocate more money out of strapped local revenues.

The need for new supportive housing developments that addresses the needs of special populations and those experiencing homelessness is critical.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	x	x	x
Legal Assistance	x	x	x
Mortgage Assistance	x		x
Rental Assistance	x	x	x
Utilities Assistance	x	x	x
Street Outreach Services			
Law Enforcement	x	x	x
Mobile Clinics	x		
Other Street Outreach Services	x	x	x
Supportive Services			
Alcohol & Drug Abuse	x	x	x
Child Care	x	x	x
Education	x	x	
Employment and Employment Training	x	x	x
Healthcare	x	x	x
HIV/AIDS	x	x	x
Life Skills	x	x	x
Mental Health Counseling	x	x	x
Transportation	x	x	x
Other			
Early Childhood Education	x	x	x
Nutritional Support	x	x	x

Table 57 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above to meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Within the city of Las Cruces, Mesilla Valley Community of Hope offers a variety of temporary and permanent housing options for those experiencing homelessness. Additionally, they manage Camp Hope, a tent city with 50 tent pad sites, full-service bathroom, and a kitchen. La Casa, Inc. provides services for victims of domestic violence. Families and Youth, Inc. provide wraparound services for homeless youth and families in Las Cruces. Gospel Rescue Mission also provides emergency food and lodging services in Las Cruces and is open 24 hours a day, seven days a week.

Community stakeholders from Community of Hope, Families and Youth, Inc., and La Casa have all stated that finding permanent housing for homeless individuals in Las Cruces can be difficult. Many individuals qualify for rental assistance programs, such as Housing Choice Vouchers, but many private landlords are not willing to rent to those with vouchers. Additionally, many homeless individuals may have mental health conditions and/or substance use disorders that require additional wraparound services that can be difficult to access. The Community of Hope campus, however, is unique in that it serves almost as a "one-stop shop" for individuals as the campus is home to laundry and mail services, a legal clinic, a medical clinic, and more.

Located on the Community of Hope Campus, the Casa De Peregrinos food program is seeking to expand its community impact by partnering with the City of Las Cruces to fund building expansion. With a larger space to serve clients, and increased warehouse storage, Casa de Peregrinos will continue delivering food and shelter to individuals and families experiencing hardships.

Through CDBG and non-HUD funding, the City provides public services grants to nonprofits who assist in homeless prevention and homeless services to extremely low-income individuals and families. The City continues oversight and technical assistance to affordable rental partners for affordable rental housing.

Coordinated efforts to provide funding and facilities to the non-profit agencies providing housing and needed services to the homeless population in the City of Las Cruces are on-going. City staff participates in regularly scheduled meetings to discuss facilities provided by the City and services to the homeless population. Opportunities to increase and improve services and address needs to the homeless population are discussed at various levels. On-going technical assistance is provided to the various agencies providing services to the homeless.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The COVID-19 Pandemic has placed additional demand on service providers. One key stakeholder interviewed for this project explained: "COVID has not added new needs. It's exacerbated all our preexisting ones." Service delivery agencies in Las Cruces reported increased demand for their services in 2020 and noted these issues will persist in 2021 and beyond. To some extent, the ability to expand the service delivery system for individuals experiencing homelessness is dependent on greater resource availability. This is a challenging situation because the fiscal pressures on local government make it difficult for local government to simply allocate more money out of strapped local revenues.

The need for new supportive housing developments that addresses the needs of special populations and those experiencing homelessness is critical. Barriers include a current lack of investment within older areas of the city for redevelopment, lack of infill development strategy, and a lack of variety of housing types being developed.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City of Las Cruces will need to make substantial changes to its Las Cruces Development Code to achieve sustainable growth through its Elevate Las Cruces Comprehensive Plan. Elevate Las Cruces recommends that the City revise its Development Code using a form-based code approach that incorporates transect-based principles. The transect-based approach to zoning is already being utilized by the City within the Downtown Development Code. Key policies related to Housing Choice are identified and reviewed below.

Policy CE-1.2: Promote investment within older areas of the city through redevelopment.
Policy CE-2.1 Promote infill development strategies to sustain the city's established neighborhoods and historic residential areas.
For the City to obtain this goal, it must facilitate infill or higher density mixed use development in key places. To do this, the City will need to partner with property owners of vacant land and builders for infill opportunities. During the qualitative stakeholder interviews with several local builders and developers, it was revealed that it was difficult to build affordable housing on infill properties in Las Cruces due to high costs of land, high impact fees, regulations, and potential theft of building materials. To promote investment within older areas of the city, especially infill opportunities, the City needs to offer more monetary incentives, reduce impact fees even more, and/or loosen regulations and policies. Additionally, focus groups and stakeholder interviews also revealed that there is a stigma with "affordable housing" that leads to many residents saying, "not in my neighborhood." The stigma further reduces the opportunity to diversify housing type in older, established neighborhoods in the city of Las Cruces.

Policy CE-4.1: Encourage a variety of housing types into new and redeveloping neighborhoods to provide options for all ages and incomes throughout the city.

Elevate Las Cruces' goal of developing "complete" neighborhoods is derived from the concept of the Neighborhood Unit originally conceived by Clarence Perry in the early 1900s. The concept includes elements such as centered around schools and other civics and transit accommodations. For the City to obtain the goal of developing neighborhoods and new housing types in a variety of neighborhoods from urban to suburban, the City may need to revise its zoning policies and provide incentives for builders and developers to build a variety of housing types, especially multi-units. According to permit data pulled from the City of Las Cruces from 2010 through 2020, only 36 permits were pulled for multi-unit construction. The City has a goal of building 5,310 additional multi-unit units through 2045. In order to achieve this goal, the City of Las Cruces needs to work with builders, developers, landowners, and neighborhood residents to encourage the development of multi-units and dwellings other than single family houses. Qualitative interviews and focus groups identified a stigma around multi-unit dwellings, especially units designated as affordable. The City of Las Cruces should encourage a communitywide campaign and educational sessions so community residents can learn about the City's development plan.

SP-45 Goals Summary – 91.215(a)(4)

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Low- to moderate-income residents will have access to safe, decent, and affordable housing	2021	2025	Affordable Housing, Homeless, Public Housing	Citywide	Housing Needs, Reduce Homelessness	CDBG: $629,641 HOME: $546,071	Housing Units Rehabilitated: 34 Individuals Benefitting from Housing Assistance: 234
2	Improve access to current programs for health and safety, information, transportation, and recreation services	2021	2025	Non-Homeless Special Needs, Non-Housing Community Development	Citywide	Community Services (Public Services)	CDBG: $350,000	Improved Access to public service center: 30,000 persons assisted
3	Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development	2021	2025	Non-Homeless Special Needs, Non-Housing Community Development	Citywide	Economic Development	CDBG: $41,000	Individuals given access to economic opportunity: 58
4	Enhance the quality and use of the physical infrastructure in Las Cruces.	2021	2025	Non-Homeless Special Needs, Non-Housing Community Development	Citywide	Public Improvements and public infrastructure, Community and Public facilities	CDBG: $160,000	Improved public services for individuals: 750 Improved Public Services for

								Households: 18,000
5	Prevent and reduce homelessness	2021	2025	Homeless, Affordable Housing	Citywide	Homeless Needs and Services	CDBG: $60,000	Provide Homeless Services for: 625 Individuals

Goals Summary Information

Table 58 – Goals Summary

Goal Descriptions

1	**Goal Name**	Low- to moderate-income residents will have access to safe, decent, and affordable housing
	Goal Description	Overall, the biggest need mentioned by providers in community stakeholder interviews, community focus group meetings, and the community survey was for additional affordable housing units for very low-income households, accessible units for those with physical disabilities, transitional or permanent housing for persons experiencing homelessness and/or mental health/substance use disorders. To improve access to safe, decent, and affordable housing, the City of Las Cruces will preserve existing affordable housing options, provide incentive programs to develop to encourage building of multi-units and mixed-use development, and offer programs to help homeowners modify units for rehabilitation and accessibility.
2	**Goal Name**	Improve access to current programs for health and safety, information, transportation, and recreation services
	Goal Description	There is great need for easy access to community services that serve large swaths of the population. Additionally, the need for recreation is greater than ever, with social isolation and lack of community activities. The City of Las Cruces will improve access to current programs by increasing awareness about available services in the community, provide free or low-cost services to qualified individuals, and expand current services.
3	**Goal Name**	Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development.
	Goal Description	Las Cruces has all the structures in place to be a desirable place for business and families to grow and thrive. An international airport, a state-of-the-art business park, a University, and geographic proximity to major industry. Providing incentive to continue growth in Las Cruces will provide a boost to all citizens. The City will support the development of job skills training for youth, workforce development and job creation, and take the lead on developing mixed use sites for housing and industry growth.
4	**Goal Name**	**Enhance the quality and use of the physical infrastructure in Las Cruces**
	Goal Description	Many community leaders and stakeholders have expressed the need for greater infrastructure to serve the diverse communities in Las Cruces. Improved transportation and facilities will increase flow throughout the city, allowing Las Cruces residents of all types to access services more easily. The City will work to develop and/or improve youth centers and recreation facilities, ensure bus routes

		are tied to housing and areas of employment, and work to provide transit for those who cannot afford it.
5	**Goal Name**	**Prevent and reduce homelessness.**
	Goal Description	There is great need to increase resources available for individuals and households experiencing repeated episodes of homelessness, episodic homelessness, and the threat of homelessness. Presently it is challenging for households in this situation to obtain stable decent housing and the accompanying needed supportive services to maintain stability in an independent living environment. The City has had to resort to supporting an overflow tent village to provide a basic level of safety and sanitary living conditions for those who are unable to obtain stable permanent housing through the homeless support system in the community. The City will focus on homeless prevention through short term assistance to pay rent, utility bills, and other items which could force a household into homelessness.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Las Cruces estimates to assist 234 extremely low-, low- and moderate-income renters with affordable housing access, and 34 rehabilitated units of housing.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Mesilla Valley Public Housing Authority is not under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

The Housing Authority has a Resident Advisory Board, and resident council boards for each of the four public housing developments. The Housing Authority has worked with private and public developers of housing to partner on Low Income Housing Tax Credit developments to expand the inventory of affordable rental properties available in Las Cruces

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

NA

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The following impediments or potential barriers to affordable housing were identified in the 2021-2015 Analysis of Impediments to Fair Housing Choice.

IMPEDIMENT 1: LACK OF KNOWLEDGE ABOUT FAIR HOUSING ROLES AND RESPONSIBILITIES OF CONSUMERS AND PROVIDERS.

ANALYSIS: Roles and responsibilities of both consumers and housing providers under federal and local Fair Housing rules can be complex and often up-to-date, accurate information is not readily available. Qualitative research through stakeholder interviews, community focus groups, and an online community survey revealed that Fair Housing laws are not widely known, and many community residents don't know who to turn to if they have questions or issues in Las Cruces. The City and many community organizations that work with housing issues report that they do train staff, but general awareness regarding Fair Housing in the community is low. The City would like to increase Fair Housing awareness, roles, and responsibilities for both consumers and providers. The actions outlined below are intended to increase the knowledge base of both consumers and producers.

IMPEDIMENT 2: DISCRIMINATION BY PROPERTY OWNERS AND MANAGERS, AGAINST PERSONS WITH DISABILITIES AND/OR HOUSING VOUCHER PROGRAMS LIMITS THESE GROUPS FROM EQUAL ACCESS TO HOUSING.

ANALYSIS: Key informants, community surveys and public meeting comments point to instances of discriminatory practices for individuals and households who have a member with a disability and/or a receipt of a housing voucher. Community focus groups and the community survey revealed that there is a significant stigma about people who have a housing voucher through the Section 8 or other programs. Many private landlords refuse to rent to those who have a housing voucher and with limited public housing options, many eligible individuals who have a housing voucher cannot find adequate housing. Additionally, many of the rental properties in Las Cruces are not accessible and many landlords are reluctant to allow tenants to make modifications to the property. There were several fair housing complaints filed with HUD involving individuals with disabilities.

IMPEDIMENT 3: THE INCREASING COST AND SCARCITY OF BOTH RENTAL AND FOR SALE HOUSING DISPROPORTIONATELY IMPACTS LOW INCOME HOUSEHOLDS AS QUANTIFIED IN THE CONSOLIDATED PLAN AND THE HOUSING CONCERNS SECTION OF THE ANALYSIS OF IMPEDIMENTS.

ANALYSIS: Approximately half of all renters in Las Cruces have one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing). Households earning less than 50% AMI are more likely to experience cost burden and severe cost burden than those earning high incomes, especially among renters. There is a severe lack of quality affordable rental units in Las Cruces and a hot housing market is only increasing the median sale price of homes in the City making homeownership harder for households earning less than the median income. The housing gap charts show that a major barrier to Fair Housing Choice is the lack of units available to households with limited incomes. The lack of affordable units, results in many residents who are cost burdened and cannot afford the units available in the market.

IMPEDIMENT 4: LOAN DENIAL RATES REMAIN RELATIVELY HIGH FOR SOME RACIAL/ETHNIC GROUPS.

Analysis: Although HMDA data is not conclusive, it does show some racial/ethnic groups may struggle more on the dream to homeownership. Loan denial rates show that American Indian or Alaska Native, Hispanic, and women have slightly higher loan denial rates than other groups. Data in the Analysis of Impediments to Fair Housing Choice report, shows underlying systemic racism that had hurt people of color for decades. Black or African America and American Indian or Alaska Native individuals are more likely to get denied a loan due to credit history.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Proposed Actions the City will take to address Impediment 1:

- The City will continue to be a partner with other agencies and programs to increase awareness of Fair Housing Laws and policies including those at the Federal level, State level and local level. The City will provide an updated Fair Housing website as part of the Las Cruces web portal. The Fair Housing website will contain necessary information in English and Spanish including Fair Housing Laws and Ordinances as well as information on agencies to contact and the steps needed to file a complaint. It will also contain the City's adopted Analysis of Impediments to Fair Housing Action Plan. The City will provide Fair Housing materials and all other informational documents related to its Community Development activities and reports in alternative formats if requested by a disabled person. Ongoing.
- As the administrator and technical assistance provider for Federal and local housing programs the City Community Development Department will work with subgrantees as well as private housing providers to ensure that housing consumers are dealt with in a non-discriminatory fashion as defined by Fair Housing rules. The City will provide printed and electronic information to landlords and property managers that they can pass on to prospective tenants and purchasers. This information will be a brief summary of the information contained on the City's Fair Housing website. Fair Housing information will be made available in alternative formats upon request. Ongoing.
- The City Community Development Department will partner with professional associations and fair housing agencies to provide community forums and meetings educating citizens on Fair Housing laws and their importance in ensuring equal access to housing and the programs and services the City provides. The City of Las Cruces Fair Housing Ordinance (Chapter 13: Article I) will also be explained and highlighted at public Fair Housing events. Annually.

Proposed Actions the City will take to address Impediment 2:

- The City of Las Cruces Community Development Department will continue its outreach and educational efforts to inform builders, property owners and landlords of the provisions and requirements that must be met in providing equal access to housing for the protected classes of people outlined above. The educational effort will include providing written and electronic information on how housing providers can ensure that advertising, screening processes, lease policies, and general interactions with those seeking housing are treated equally. The City educational effort will also include information for builders on ways to address accessibility requirements through the design and construction of accessible, adaptable units. The City will continue to partner with other agencies serving the Las Cruces area to educate property owners, Mesilla Valley Public Housing Authority, managers, and builders on their Fair Housing responsibilities. Partner agencies may include Las Cruces Homebuilders Association, Las Cruces Association of Realtors, New Mexico Human Rights Division, and local community organizations with involvement in Fair Housing Activities. Ongoing.

- Through online and printed Fair Housing materials, the City Community Development Director or designee, will assist complainants who wish to file a discrimination complaint, in filing the necessary forms and providing guidance and referrals on the process the City and other state and federal agencies will utilize in responding to complaints. Ongoing.
- The City will post Fair Housing Information at all facilities controlled by the City of Las Cruces. This effort will be extended to City subgrantees which provide housing services. Those agencies will be required to post the Fair Housing sign at all housing facilities assisted with local or federal funds. Ongoing.
- The City will enforce its Fair Housing Ordinance in cases of discrimination as prescribed in the Ordinance. Ongoing.
- The City will provide technical assistance and oversight to CDBG and HOME subgrantees to ensure that each agency has a compliant Affirmatively Furthering Fair Housing Marketing Plan (AFFHMP), if applicable. The City will monitor the use of the agency AFFHMP to determine the success of subgrantees in using the plan to encourage participation in housing activities by underserved populations. Ongoing.
- The City will monitor its communications and public outreach and funding activities to measure the effectiveness of its AFFHMP to ensure that underserved populations are actively recruited to participate in public meetings and housing programs and activities. Annually.

Proposed Actions the City will take to address Impediment 3:

- The City will examine current planning and development review procedures to provide fast tracking and concurrent review of affordable rental projects. Elevate Las Cruces has provided some guidelines on affordable housing going forward. The City will work with its stakeholders to update its Affordable Housing Ordinance that more clearly outlines what incentives, concessions, and enhancements it will make available to increase the production of affordable rental housing that meets the needs of those with the greatest challenges. Annually.
- The City will continue to serve as lead convener of state level and federal agencies and private sources of capital to create a more robust set of tools to address the development cost of new housing. This enhanced finance approach will focus on Low-income Housing Tax Credits, HOME Investment Partnership Funding, various supportive housing financing sources, various tax-exempt bonds including General Obligation Bonds and affordable loans from lenders doing business in the community. Ongoing.

- The City will review density limitations, minimum lot sizes and other regulations that may constrict housing providers' ability to produce both smaller apartments and for sale homes for sectors of the market which cannot presently afford the products available in Las Cruces. Ongoing.
- Development Readiness Measures: The City through its mapping and property records system will identify vacant and underutilized residentially zoned properties in zoning areas that have adequate infrastructure to support greater densities for residential uses. This action could effectively steer development to sites that are considered suitable by the locality and expedite the pace at which affordable development occurs. Annually.
- The City will continue to provide limited financial assistance to households who qualify for long term mortgages. The City will utilize its Impact Fee Deferral policies for starter homes that meet the City definition of affordable housing. Annually.
- The City will track the numbers of those populations which receive assistance to alleviate the identified housing problems. Annually.
- The City will update its Affordable Housing Plan to review and develop strategies, goals, and measures to encourage and track the development of affordable housing in Las Cruces. 2021-2022

Proposed Actions the City will take to address Impediment 4:

- The City will support organizations that provide credit and homebuying counseling, such as Tierra del Sol and the TYWCA to ensure that the programs are geographically targeted to areas in the community where loan denial rates are the highest.
- The City will provide educational information about how to access government sponsored and subsidized loans that have more flexible underwriting standards, as well as types of lenders to avoid.
- The City will work with lenders to ensure all lenders are trained on Fair Housing laws.

SP-60 Homelessness Strategy – 91.215(d)

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

The Continuum of Care (CoC) is the coordinated approach that addresses physical, economic, and social needs of the homeless population. Services organized within the Continuum of Care include emergency shelter, transitional and permanent housing, and supportive services. The New Mexico Coalition to End Homelessness (NMCEH), is the leader of this process. NMCEH convenes, manages, and leads the Balance of State Continuum of Care Coalition. The Mesilla Valley Community of Hope is the local lead in providing an array of services for the homeless population in Las Cruces.

Addressing the emergency and transitional housing needs of homeless persons

The City of Las Cruces and its partners provide a continuum of homeless facilities and services for individuals and families experiencing homelessness and those who are at risk of becoming homeless. Programs provided through the Continuum of Care include emergency shelter, supportive services, transitional housing, permanent supportive housing and Housing First (Rapid Rehousing). The New Mexico Coalition to End Homelessness (NMCEH) takes the lead in developing New Mexico's Continuum of Care Plan. NMCEH convenes and manages the Continuum of Care planning process and the Mesilla Valley Community of Hope provides multiple services for the homeless and chronically homeless population in Las Cruces. The table below outlines the numbers of beds under each umbrella category. The following section describes facilities and services in detail.

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 veterans and veterans with families who are homeless or at risk of homelessness utilize the Supportive Services for Homeless Veteran's Program (SSVF), the HUD VASH program with its partner, Mesilla Valley Community of Hope. There is significant focus on veterans at the local and federal level and flexible financial and service-based resources are helping veterans in Las Cruces obtain and maintain permanent housing. Some homeless veterans live at the tent city though it is only a temporary (12-month) solution. The Housing Authority owns an apartment complex where Community of Hope can place homeless veterans. There are 22 dedicated units and an on-site HUD VASH Representative and a Community of Hope Case Manager present to serve those veterans.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs

The Mesilla Valley Public Housing Authority (MVPHA) operates a variety of programs for residents of Las Cruces and throughout Dona Ana County, including Section 8 choice vouchers, public housing, and elderly price restricted rental units. The Housing Authority administers 1,227 housing choice vouchers within the City of Las Cruces. They also own 248 public housing units located in Las Cruces.
Families and Youth, Inc. serves disadvantaged, and homeless youth with a variety of programs including transitional housing and supportive housing.

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

The Continuum of Care (CoC) is the coordinated approach that addresses physical, economic, and social needs of the homeless population. Services organized within the Continuum of Care include outreach, emergency shelter, transitional and permanent housing, and supportive services. The New Mexico Coalition to End Homelessness (NMCEH), is the leader of this process. NMCEH convenes, manages, and leads the Balance of State Continuum of Care Coalition. The Mesilla Valley Community of Hope is the local lead in providing an array of services for the homeless population in Las Cruces. The City provides technical assistance, coordination and support for the agencies which serve homeless populations. As part of the training and technical assistance the City works with agencies to provide effective outreach and needs assessment for those individuals experiencing homelessness.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The purpose of the Residential Lead-Based Paint Hazard Reduction Act of 1992 is to develop a national strategy to eliminate lead-based paint hazards in all housing as expeditiously as possible; to implement, on a priority basis, a broad program to evaluate and reduce lead-based paint hazards in the Nation's housing stock; to encourage effective action to prevent childhood lead poisoning by establishing a framework for lead-based paint hazard evaluation and reduction; to ensure that the existence of lead-based paint hazards is taken into account in the development of Government housing policies and in the sale, rental, and renovation of homes and apartments; to mobilize national resources through a partnership among all levels of government and the private sector; to reduce the threat of childhood lead poisoning in housing owned, assisted, or transferred by the Federal Government; and to educate the public concerning the hazards and sources of lead-based paint poisoning and steps to reduce and eliminate such hazards. The City will continue to test homes constructed prior to 1978 for lead-based paint at the time households seek assistance under the City's Home Rehabilitation Program.

How are the actions listed above related to the extent of lead poisoning and hazards?

The table below, from the City's Home Rehabilitation Handbook, summarizes the procedures taken to remove or mitigate lead paint during rehabilitation work.

SUMMARY OF LEAD-BASED PAINT REQUIREMENTS

FOR REHABILITATION (24 CFR 35; Subpart J)

Total Project Cost	**Less than $5,000**	**$5,000 to $25,000**	**More than $25,000**
Strategy	Do no harm	Assess and Control Lead Hazards	Assess and Abate Lead Hazards
Notification	All 3 types	All 3 types	All 3 types
Lead Hazard Evaluation	Paint Testing or Presume Lead	Paint Testing and Risk Assessment or Presume Lead	Paint Testing and Risk Assessment or Presume Lead
Lead Hazard Reduction	Repair Surfaces disturbed during rehabilitation	Interim Controls and Standard Treatments	Abatement (Interim controls on exterior surfaces not disturbed by rehabilitation)
Work Practices	Safe work practices Clearance of site	Safe work practices Clearance of site	Safe work practices Clearance of site
Total Project Cost	**Less than $5,000**	**$5,000 to $25,000**	**More than $25,000**
Documentation	Notice Evaluation Clearance Report	Notice Evaluation Clearance Report	Notice Evaluation Clearance Report

How are the actions listed above integrated into housing policies and procedures?

The City of Las Cruces Home Rehab CDBG program policies include provisions for compliance with applicable lead-based paint hazard reduction. The City will continue to provide required notice and information to all home rehabilitation program participants of the hazards posed by lead paint. Home Rehabilitation staff attend CDBG Lead Based Paint Remediation training when the training is available.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Las Cruces Economic Development department has identified the following initiatives to serve as an anti-poverty strategy:

- Building a local wealth program within the Economic Development department created to reach low- and moderate-income populations.
- Implementation of a Microbusiness Technical Assistance Program (MTAP) to support low-income business owners/entrepreneurs.
- Workforce development partnerships with Dona Ana Community College, Workforce Connections and Workforce Solutions for coordinated efforts to reach the chronically unemployed and recently displaced workers.
- A business incubator with affordable retail space for startups in downtown, accessible to lower income segments of the population.
- A Small Business section dedicated to serve locally owned businesses and for the purposes of Business Retention and Expansion resulting in job creation.
- A business recruitment section dedicated to facilitating job creation through new companies locating in Las Cruces.
- Programming provided in English and Spanish, allowing to lower the barrier to access resources based on language constraints.

How are the Jurisdiction's poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City of Las Cruces wants to address poverty by providing access to affordable housing, revitalizing neighborhoods, and developing mixed use sites throughout the city. This plan will serve as the launching pad for an anti-poverty strategy. It is through housing the city can fulfill its anti-poverty initiatives, while making the city more desirable from a housing market and business development standpoint. The Las Cruces City Council is considering a General Obligation Bond to secure funding for affordable housing. For every dollar of city investment, four dollars of non-city investment are secured. This goal also aligns with the city's Elevate comprehensive plan, which identified goals of Economic Equity, Attainable Housing, Serving Underserved Populations, Diversification, and Entrepreneurship.

SP-80 Monitoring – 91.230

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

The City of Las Cruces has a well-established procurement and contracting process that ensures sub-grantees meet the established goals and outcomes for the project, program or services funded by the City.

At least annually, each subrecipient is monitored to ensure subrecipient files contain the necessary documentation to validate that program funds have been expended on appropriate expenses that produce the outcomes specified in contract documents.

The City monitors subrecipient documentation to ensure the subrecipient meets the cross-cutting requirements contained in HOME and CDBG regulations, including Section 3, National Environmental Protection Agency (NEPA) requirements, procurement and Fair Housing Marketing and Outreach and all other cross-cutting requirements.

The City also partners with subrecipients to ensure their activities are tracked and documented for use in other City plans and strategies that measure how well the City is meeting the milestones and outcome indicators contained in other strategic plans as well as the Consolidated Plan. The City requires sometimes, monthly, and quarterly performance updates from sub-grantees. Annually the City updates the Annual Action Plan to reflect progress and deficiencies within the stated Goal Outcome indicators included in the Strategic Plan and One-Year update. The City completes the HUD required Consolidated Annual Evaluation Reporting System report (CAPER) annually, to document achievements and identify areas of deficiency.

The City through its Section 3 recruitment efforts and in conjunction with its Economic Development Department, provides outreach and technical assistance to minority and women owned businesses to ensure that local enterprises are aware of and capable of participating in City funded projects and activities listed in the Consolidated Plan.

City of Las Cruces
MOUNTAINS OF OPPORTUNITY

2021 Annual Action Plan

DRAFT FOR PUBLIC COMMENT

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Prepared For:

City of Las Cruces

Housing and Neighborhood Services

March 11, 2021

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

Introduction

HOME Investment Partnerships grant program has flexibility to assist in housing programs; participating jurisdictions decide how to use money for: Acquisition, Rehabilitation, New Construction, Tenant Based Rental Assistance (TBRA), Home Buyer Assistance, Planning, and Operating Assistance for CHDOs. For 2021, the City anticipates it will receive $463,500 of HOME Entitlement funds. The City anticipates receiving approximately $55,000 in estimated program income from previous Home Rehabilitation projects that are paying off their mortgages or other HOME projects (rental properties) with loans that require repayment to the City's HOME Program. This will give the City's 2021 HOME Program a full funding amount of $518,500.

With the CDBG program funds may be used to address neighborhood revitalization, economic development, provisions of improved community facilities, prevention and elimination of slums or blight, and activities aiding low- and moderate-income families. For 2021, the City anticipates receiving $962,200 of CDBG Entitlement funds and an anticipated $35,000 of program income from houses which have been previously rehabilitated. This will give the City's 2021 CDBG Program a full funding amount of $997,200.

The City has an Affordable Housing Land Bank and Housing Trust Fund with approximately $500,000 in funds available for implementation in accordance with the City's Affordable Housing General Oversight Ordinance once the City has a written Affordable Housing Plan approved by MFA. Other efforts include an impact fee waiver program for developers of affordable housing in the City of Las Cruces (approximately $25,000 in value).

Las Cruces has a local Health and Human Services funding source for health-related public services. The annual amount available for allocation is $400,000.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	1,014,641	35,000	191,000	1,240,641	4,058,564	CDBG funding is used for a variety of programs and projects in Las Cruces. Prior Year Resources are excess program income.

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	491,071	55,000	0	546,071	1,964,284	HOME funds are used for both homeownership and rental housing projects and programs. Prior Year Resources is excess program income.

Other	public - local	Acquisition Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership	500,000	0	0	50,000	2,000,000	The Affordable Housing Trust Fund dollars are used for affordable housing related projects.
Other	public - local	Housing	25,000	0	0	15,000	100,000	The City providers impact fee waivers for specific projects.

Other	public - local	Public Services	400,000	0	0	300,000	1,600,000	These funds are used to provide public service funding to a variety of human service organizations working in Las Cruces.

1 - 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.

HOME and CDBG funds will leverage additional resources including Low Income Housing Tax Credit funding (multi-family years), private investors, private donations, and local funds.

The HOME funds generally require a match of local monies; however, through CPD Notice 07-05, issued July 11, 2007 and expiring July 11, 2008, the City's HOME match percentage had been waived or reduced by 100% from PY 2004 through PY 2014. The HOME funds normally require a 25% match; however, due to federal guidelines for HOME match waivers, the City of Las Cruces currently receives a 0% reduction in match liability waiver for Federal fiscal year 2020 and we assume there will be a match reduction for 2021-2025 as well. Match requirements will be satisfied through various sources to including TBRA supportive services, local loan amounts in conjunction with MFA Mortgage Revenue Bond Program, volunteer labor and sweat equity, amounts discounted from sales prices of land to value amount for lot purchases for affordable housing development and other non-federal sources. The City currently has $1,120,091.48 in excess match contributions.

The City requires a CDBG match of 50% for infrastructure programs as of 2015.

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

Public owned land and facilities are used for homeless services including, medical, childcare, homeless day shelter, food services, meals, and victims of domestic violence emergency shelter and services. Additionally, public owned land or the proceeds from the sale of public owned land may be used for the development of affordable housing.

Discussion

1. Due to limited funding, the City of Las Cruces will require that no more than $200,000 of HOME funds, starting in Program Year 2016, may be dedicated to a single project (but not necessarily one single agency in one program year). Should the dedication or financing of a land bank and trust fund be established, the City may evaluate and update this policy as appropriate

2. Due to limited HOME funding each program year, the City of Las Cruces will alternate the priority between dedicating HOME funds between affordable rental housing development and single-family homeownership developments. Starting in Program Year 2017, funding will be priority to affordable rental housing development and continue in odd numbered years (2019). Single family housing development will receive priority in even numbered program years (2016, 2018, 2020). However, given the number, type, and quality of applications for funding and any undedicated funds available, HOME funds may be provided to the other priority in any given year.

The City of Las Cruces requires that no more than 50% of CDBG funds may be dedicated to infrastructure, public facilities, or economic development activities that result in capital or facility improvements and that the remaining 50% or more may come from other sources. Other sources can include other federal, state, local, and private funds. For improvements made to City-owned facilities that are occupied by non-city operated programs, the other 50% must come from other federal, state and private (non-City of Las Cruces) sources or will provide full funding from CDBG funds with 50% of the funding provided as loan, resulting in program income upon payback.

AP-20 Annual Goals and Objectives

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Low- to moderate-income residents will have access to safe, decent, and affordable housing	2021	2025	Affordable Housing, Homeless, Public Housing	Citywide	Housing Needs, Reduce Homelessness	CDBG: $629,641 HOME: $546,071	Housing Units Rehabilitated: 34 Individuals Benefitting from Housing Assistance: 234
2	Improve access to current programs for health and safety, information, transportation, and recreation services	2021	2025	Non-Homeless Special Needs, Non-Housing Community Development	Citywide	Community Services (Public Services)	CDBG: $350,000	Improved Access to public service center: 30,000 persons assisted
3	Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development	2021	2025	Non-Homeless Special Needs, Non-Housing Community Development	Citywide	Economic Development	CDBG: $41,000	Individuals given access to economic opportunity: 58

4	Enhance the quality and use of the physical infrastructure in Las Cruces.	2021	2025	Non-Homeless Special Needs, Non-Housing Community Development	Citywide	Public Improvements and public infrastructure, Community and Public facilities	CDBG: $160,000	Improved public services for individuals: 750 Improved Public Services for Households: 18,000
5	Prevent and reduce homelessness	2021	2025	Homeless, Affordable Housing	Citywide	Homeless Needs and Services	CDBG: $60,000	Provide Homeless Services for: 625 Individuals

Goals Summary Information

Table 58 – Goals Summary

Goal Descriptions

1	**Goal Name**	Low- to moderate-income residents will have access to safe, decent, and affordable housing
	Goal Description	Overall, the biggest need mentioned by providers in community stakeholder interviews, community focus group meetings, and the community survey was for additional affordable housing units for very low-income households, accessible units for those with physical disabilities, transitional or permanent housing for persons experiencing homelessness and/or mental health/substance use disorders. To improve access to safe, decent, and affordable housing, the City of Las Cruces will preserve existing affordable housing options, provide incentive programs to develop to encourage building of multi-units and mixed-use development, and offer programs to help homeowners modify units for rehabilitation and accessibility.
2	**Goal Name**	Improve access to current programs for health and safety, information, transportation, and recreation services
	Goal Description	There is great need for easy access to community services that serve large swaths of the population. Additionally, the need for recreation is greater than ever, with social isolation and lack of community activities. The City of Las Cruces will improve access to current programs by increasing awareness about available services in the community, provide free or low-cost services to qualified individuals, and expand current services.
3	**Goal Name**	Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development.
	Goal Description	Las Cruces has all the structures in place to be a desirable place for business and families to grow and thrive. An international airport, a state-of-the-art business park, a University, and geographic proximity to major industry. Providing incentive to continue growth in Las Cruces will provide a boost to all citizens. The City will support the development of job skills training for youth, workforce development and job creation, and take the lead on developing mixed use sites for housing and industry growth.
4	**Goal Name**	**Enhance the quality and use of the physical infrastructure in Las Cruces**
	Goal Description	Many community leaders and stakeholders have expressed the need for greater infrastructure to serve the diverse communities in Las Cruces. Improved transportation and facilities will increase flow throughout the city, allowing Las Cruces residents of all types to access services more easily. The City will work to develop and/or improve youth centers and recreation facilities, ensure bus routes

		are tied to housing and areas of employment, and work to provide transit for those who cannot afford it.
5	**Goal Name**	**Prevent and reduce homelessness.**
	Goal Description	There is great need to increase resources available for individuals and households experiencing repeated episodes of homelessness, episodic homelessness and the threat of homelessness. Presently it is challenging for households in this situation to obtain stable decent housing and the accompanying needed supportive services to maintain stability in an independent living environment. The City has had to resort to supporting an overflow tent village to provide a basic level of safety and sanitary living conditions for those who are unable to obtain stable permanent housing through the homeless support system in the community. The City will focus on homeless prevention through short term assistance to pay rent, utility bills and other items which could force a household into homelessness.

AP-35 Projects – 91.220(d)

Introduction

The City of Las Cruces has allocated CDBG and HOME funds to projects in 2021 that meet its Priority Needs and Annual Goals. These projects include homeowner rehabilitation, land acquisition for new construction of for-sale affordable homes, rehabilitation of affordable rental housing, public service activities, and public facility repairs.

Projects

#	Project Name
1	City of Las Cruces Admin
2	CHDO Operating Funds
3	Habitat for Humanity Property Acquisition and Single-Family Development
4	HOME TBRA
5	City Home Rehabilitation
6	CDBG Public Services
7	Casa de Peregrinos
8	Families and Youth, Inc.
9	Community of Hope
10	La Casa

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

Allocation priorities were made based upon annual goals and priority needs, agency funding requests and needs, and current opportunities to meet goals.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	City of Las Cruces Admin
	Target Area	Citywide
	Goals Supported	Low- to moderate-income residents will have access to safe, decent, and affordable housing
	Needs Addressed	Reduce Homelessness More affordable, accessible rental housing Preserve existing affordable housing Affordable home ownership options Improve public facilities/infrastructure expand economic opportunity
	Funding	CDBG: $149,600 HOME: $54,071
	Description	in Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	All CDBG and HOME beneficiaries from other activities will benefit from expenditure of CDBG and HOME funds for administration of the programs.
	Location Description	All program year 2021 CDBG and HOME funded activities will be in the City of Las Cruces with the exception of any travel expenses for training purposes.
	Planned Activities	CDBG and HOME eligible administrative expenses including a set aside for Fair Housing Activities and the Consolidated Plan.

2	**Project Name**	CHDO Operating Funds
	Target Area	Citywide
	Goals Supported	Provide affordable home ownership options
	Needs Addressed	Reduce Homelessness More affordable, accessible rental housing Preserve existing affordable housing Affordable home ownership options Improve public facilities/infrastructure expand economic opportunity
	Funding	HOME: $12,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	At least 5 families will benefit working with MVHFH employees.
	Location Description	CHDO operating assistance will take place at Habitat's main office at 720 Santa Fe.
	Planned Activities	Assistance is getting families qualified for HOME-assisted building single family building projects.
3	**Project Name**	Habitat for Humanity Property Acquisition and Single-Family Dev
	Target Area	Citywide

	Goals Supported	Provide affordable home ownership options
	Needs Addressed	Reduce Homelessness More affordable, accessible rental housing Preserve existing affordable housing Affordable home ownership options Improve public facilities/infrastructure Expand Economic Opportunity
	Funding	CDBG: $150,000 HOME: $180,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Up to 5 low-income households, below 80% AMI will be assisted.
	Location Description	Agency is evaluating lots in the City's Los Enamorados Estates (Diamante Ct.) and/or Tierra Grange/Rincon Mesa or nearby Subdivisions in Las Cruces New Mexico.
	Planned Activities	Habitat for Humanity Property Acquisition and Single Family Development.
4	**Project Name**	HOME TBRA
	Target Area	Citywide

	Goals Supported	Low- to moderate-income residents will have access to safe, decent, and affordable housing
	Needs Addressed	Reduce Homelessness
	Funding	CDBG: $300,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Up to 14 households fleeing domestic violence and 14 households experiencing homelessness.
	Location Description	Scattered Site
	Planned Activities	Tenant Based Rental Assistance including utility assistance and security deposits.
5	**Project Name**	City Home Rehabilitation
	Target Area	Citywide
	Goals Supported	Preserve existing affordable housing
	Needs Addressed	Reduce Homelessness More affordable, accessible rental housing Preserve existing affordable housing Affordable home ownership options Improve public facilities/infrastructure Expand Economic Opportunity
	Funding	CDBG: $330,041

	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The City estimates that 20 households at 80% AMI or less will benefit. Households are selected off annual waiting lists.
	Location Description	Scattered Site.
	Planned Activities	Homeowner Rehabilitation, Mobile Home Ramp Program, and Mobile Home Utility Upgrades for households at 80% AMI or less.
6	**Project Name**	CDBG Public Services
	Target Area	Citywide
	Goals Supported	Reduce Homelessness Enhance the overall economic well-being of all residents through education and training, employment opportunities, and business development
	Needs Addressed	Reduce Homelessness More affordable, accessible rental housing Preserve existing affordable housing Affordable home ownership options Improve public facilities/infrastructure Expand Economic Opportunity
	Funding	CDBG: $160,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	Mesilla Valley Community of Hope will assist approximately 530 persons. Jardin de los Ninos will assist approximately 220 children. Casa de Peregrinos will assist approximately 18,000 households. La Casa Inc will assist approximately 500 homeless victims of domestic violence. MVCASA will assist approximately 200 children.
	Location Description	Citywide. All public service activities will be provided in the City of Las Cruces. Most service providers are located at 999 W. Amador, Las Cruces, NM on the Mesilla Valley Community of Hope homeless campus. La Casa is a domestic violence emergency shelter located at another city owned facility (Address suppressed). MV CASA provides case advocacy across the 3rd district court jurisdiction.
	Planned Activities	Program Year 2021 Public services funding to non-profit agencies to provide a variety of services including homeless services, emergency shelter for victims of domestic violence, childcare services, and advocacy for abused and neglected children and food rescue and distribution. • Mesilla Valley Community of Hope will provide homeless day shelter services, housing assistance, mail, showers etc. • Jardin de los Ninos will provide childcare services to homeless and near homeless children. • Casa de Peregrinos will conduct food rescue to supplement their food distribution program. • La Casa Inc will provide emergency shelter services for victims fleeing domestic violence. MV CASA will provide case advocacy for abused and neglected children who are part of the foster care system in the 3rd district court system.
7	**Project Name**	Casa de Peregrinos
	Target Area	Citywide
	Goals Supported	Enhance the quality and use of the physical infrastructure in Las Cruces. Prevent and reduce homelessness

	Needs Addressed	Improve public facilities/infrastructure expand economic opportunity
	Funding	CDBG: $350,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	30,000 low to extremely low-income persons, 10,000 of those estimated to be children.
	Location Description	991 W. Amador Ave.
	Planned Activities	Substantial rehabilitation and expansion for use as a food bank.
8	**Project Name**	Families and Youth, Inc.
	Target Area	Citywide
	Goals Supported	Enhance the quality and use of the physical infrastructure in Las Cruces.
	Needs Addressed	Improve public facilities/infrastructure Expand economic opportunity
	Funding	CDBG: $41,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	FYI Facility Improvement at El Crucero will benefit approximately 14 adults and 28 children. FYI Facility Improvement at My Friend's Place will benefit approximately 16 homeless teenagers.
	Location Description	FYI's El Crucero housing shelter for permanent supportive housing is located at: 1089 W. Amador Ave. FYI's My Friend's Place Teen Shelter address is confidential.
	Planned Activities	El Crucero is a rehabilitation project 12-unit complex. The My Friend's Place Teen shelter is an 8-bedroom shelter facility which will upgrade the kitchen to commercial grade.
9	**Project Name**	Community of Hope
	Target Area	Citywide
	Goals Supported	Prevent and reduce homelessness
	Needs Addressed	Improve public facilities/infrastructure expand economic opportunity
	Funding	CDBG: $20,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	100 clients and 25 staff daily.
	Location Description	999 W. Amador Ave Phase III Building.

	Planned Activities	Replacement of 3 existing security, external access doors with new, keyless entry doors. One additional door of the same type will be installed in the back of the Resource room. This will provide access for certain residents from Camp Hope from the backside of the facility.
10	**Project Name**	La Casa
	Target Area	Citywide
	Goals Supported	Prevent and reduce homelessness Low- to moderate-income residents will have access to safe, decent, and affordable housing
	Needs Addressed	Reduce Homelessness More affordable, accessible rental housing Preserve existing affordable housing Affordable home ownership options Improve public facilities/infrastructure Expand Economic Opportunity
	Funding	CDBG: $40,000
	Description	In Las Cruces, NM
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	All CDBG and HOME beneficiaries from other activities will benefit from expenditure of CDBG and HOME funds for administration of the programs.
	Location Description	800 S. Walnut St. Las Cruces, NM 88001
	Planned Activities	Interior improvements to include painting

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 City of Las Cruces does not target funding or programs to specific geographic areas within the City. Funds are allocated based upon need, priorities, and goals.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City's primary method of allocating CDBG and HOME dollars is to assist low to moderate income and special needs populations. To the extent that specific geographic areas have greater needs than other areas in the City and /or if service and housing organizations are in certain areas, they will receive a larger proportionate share of the funding. For sidewalk improvements, the City will focus on the geographic areas where sidewalks, curb cuts and related ADA accommodations are lacking. Finally, to provide affordable rental and single-family housing, the City's dollars will be allocated in areas of new development where affordable housing is lacking and/or infill areas that can accommodate affordable housing.

Discussion

All priority needs, goals and projects are designed to serve the geographic distribution area.

AP-55 Affordable Housing – 91.220(g)

Introduction

The following impediments or potential barriers to affordable housing were identified in the 2021-2015 Analysis of Impediments to Fair Housing Choice.

IMPEDIMENT 1: LACK OF KNOWLEDGE ABOUT FAIR HOUSING ROLES AND RESPONSIBILITIES OF CONSUMERS AND PROVIDERS.

ANALYSIS: Roles and responsibilities of both consumers and housing providers under federal and local Fair Housing rules can be complex and often up-to-date, accurate information is not readily available. Qualitative research through stakeholder interviews, community focus groups, and an online community survey revealed that Fair Housing laws are not widely known, and many community residents do not know who to turn to if they have questions or issues in Las Cruces. The City and many community organizations that work with housing issues report that they do train staff, but general awareness regarding Fair Housing in the community is low. The City would like to increase Fair Housing awareness, roles, and responsibilities for both consumers and providers. The actions outlined below are intended to increase the knowledge base of both consumers and producers.

IMPEDIMENT 2: DISCRIMINATION BY PROPERTY OWNERS AND MANAGERS, AGAINST PERSONS WITH DISABILITIES AND/OR HOUSING VOUCHER PROGRAMS LIMITS THESE GROUPS FROM EQUAL ACCESS TO HOUSING.

ANALYSIS: Key informants, community surveys and public meeting comments point to instances of discriminatory practices for individuals and households who have a member with a disability and/or a receipt of a housing voucher. Community focus groups and the community survey revealed that there is a significant stigma about people who have a housing voucher through the Section 8 or other programs. Many private landlords refuse to rent to those who have a housing voucher and with limited public housing options, many eligible individuals who have a housing voucher cannot find adequate housing. Additionally, many of the rental properties in Las Cruces are not accessible and many landlords are reluctant to allow tenants to make modifications to the property. There were several fair housing complaints filed with HUD involving individuals with disabilities.

IMPEDIMENT 3: THE INCREASING COST AND SCARCITY OF BOTH RENTAL AND FOR SALE HOUSING DISPROPORTIONATELY IMPACTS LOW INCOME HOUSEHOLDS AS QUANTIFIED IN THE CONSOLIDATED PLAN AND THE HOUSING CONCERNS SECTION OF THE ANALYSIS OF IMPEDIMENTS.

ANALYSIS: Approximately half of all renters in Las Cruces have one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing). Households earning less than 50% AMI are more likely to experience cost burden and severe cost burden than those earning high incomes, especially among renters. There is a severe lack of quality affordable rental units in Las Cruces and a hot housing market is only increasing the median sale price of homes in the City making homeownership harder for households earning less than the median income. The housing gap charts show that a major barrier to Fair Housing Choice is the lack of units available to households with limited incomes. The lack of affordable units, results in many residents who are cost burdened and cannot afford the units available in the market.

IMPEDIMENT 4: LOAN DENIAL RATES REMAIN RELATIVELY HIGH FOR SOME RACIAL/ETHNIC GROUPS.

Analysis: Although HMDA data is not conclusive, it does show some racial/ethnic groups may struggle more on the dream to homeownership. Loan denial rates show that American Indian or Alaska Native, Hispanic, and women have slightly higher loan denial rates than other groups. Data in the Analysis of Impediments to Fair Housing Choice report, shows underlying systemic racism that had hurt people of color for decades. Black or African America and American Indian or Alaska Native individuals are more likely to get denied a loan due to credit history.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Proposed Actions the City will take to address Impediment 1:

- The City will continue to be a partner with other agencies and programs to increase awareness of Fair Housing Laws and policies including those at the Federal level, State level and local level. The City will provide an updated Fair Housing website as part of the Las Cruces web portal. The Fair Housing website will contain necessary information in English and Spanish including Fair Housing Laws and Ordinances as well as information on agencies to contact and the steps needed to file a complaint. It will also contain the City's adopted Analysis of Impediments to Fair Housing Action Plan. The City will provide Fair Housing materials and all other informational documents related to its Community Development activities and reports in alternative formats if requested by a disabled person. Ongoing.
- As the administrator and technical assistance provider for Federal and local housing programs the City Community Development Department will work with subgrantees as well as private housing providers to ensure that housing consumers are dealt with in a non-discriminatory fashion as defined by Fair Housing rules. The City will provide printed and electronic information to landlords and property managers that they can pass on to prospective tenants and purchasers. This information will be a brief summary of the information contained on the City's Fair Housing website. Fair Housing information will be made available in alternative formats upon request. Ongoing.
- The City Community Development Department will partner with professional associations and fair housing agencies to provide community forums and meetings educating citizens on Fair Housing laws and their importance in ensuring equal access to housing and the programs and services the City provides. The City of Las Cruces Fair Housing Ordinance (Chapter 13: Article I) will also be explained and highlighted at public Fair Housing events. Annually.

Proposed Actions the City will take to address Impediment 2:

- The City of Las Cruces Community Development Department will continue its outreach and educational efforts to inform builders, property owners and landlords of the provisions and requirements that must be met in providing equal access to housing for the protected classes of people outlined above. The educational effort will include providing written and electronic information on how housing providers can ensure that advertising, screening processes, lease policies, and general interactions with those seeking housing are treated equally. The City educational effort will also include information for builders on ways to address accessibility requirements through the design and construction of accessible, adaptable units. The City will continue to partner with other agencies serving the Las Cruces area to educate property owners, Mesilla Valley Public Housing Authority, managers, and builders on their Fair Housing responsibilities. Partner agencies may include Las Cruces Homebuilders Association, Las Cruces Association of Realtors, New Mexico Human Rights Division, and local community organizations with involvement in Fair Housing Activities. Ongoing.

- Through online and printed Fair Housing materials, the City Community Development Director or designee, will assist complainants who wish to file a discrimination complaint, in filing the necessary forms and providing guidance and referrals on the process the City and other state and federal agencies will utilize in responding to complaints. Ongoing.
- The City will post Fair Housing Information at all facilities controlled by the City of Las Cruces. This effort will be extended to City subgrantees which provide housing services. Those agencies will be required to post the Fair Housing sign at all housing facilities assisted with local or federal funds. Ongoing.
- The City will enforce its Fair Housing Ordinance in cases of discrimination as prescribed in the Ordinance. Ongoing.
- The City will provide technical assistance and oversight to CDBG and HOME subgrantees to ensure that each agency has a compliant Affirmatively Furthering Fair Housing Marketing Plan (AFFHMP), if applicable. The City will monitor the use of the agency AFFHMP to determine the success of subgrantees in using the plan to encourage participation in housing activities by underserved populations. Ongoing.
- The City will monitor its communications and public outreach and funding activities to measure the effectiveness of its AFFHMP to ensure that underserved populations are actively recruited to participate in public meetings and housing programs and activities. Annually.

Proposed Actions the City will take to address Impediment 3:

- The City will examine current planning and development review procedures to provide fast tracking and concurrent review of affordable rental projects. Elevate Las Cruces has provided some guidelines on affordable housing going forward. The City will work with its stakeholders to update its Affordable Housing Ordinance that more clearly outlines what incentives, concessions and enhancements it will make available to increase the production of affordable rental housing that meets the needs of those with the greatest challenges. Annually.
- The City will continue to serve as lead convener of state level and federal agencies and private sources of capital to create a more robust set of tools to address the development cost of new housing. This enhanced finance approach will focus on Low-income Housing Tax Credits, HOME Investment Partnership Funding, various supportive housing financing sources, various tax-exempt bonds including General Obligation Bonds and affordable loans from lenders doing business in the community. Ongoing.

- The City will review density limitations, minimum lot sizes and other regulations that may constrict housing providers' ability to produce both smaller apartments and for sale homes for sectors of the market which cannot presently afford the products available in Las Cruces. Ongoing.
- Development Readiness Measures: The City through its mapping and property records system will identify vacant and underutilized residentially zoned properties in zoning areas that have adequate infrastructure to support greater densities for residential uses. This action could effectively steer development to sites that are considered suitable by the locality and expedite the pace at which affordable development occurs. Annually.
- The City will continue to provide limited financial assistance to households who qualify for long term mortgages. The City will utilize its Impact Fee Deferral policies for starter homes that meet the City definition of affordable housing. Annually.
- The City will track the numbers of those populations which receive assistance to alleviate the identified housing problems. Annually.
- The City will update its Affordable Housing Plan to review and develop strategies, goals, and measures to encourage and track the development of affordable housing in Las Cruces. 2021-2022

Proposed Actions the City will take to address Impediment 4:

- The City will support organizations that provide credit and homebuying counseling, such as Tierra del Sol and the TYWCA to ensure that the programs are geographically targeted to areas in the community where loan denial rates are the highest.
- The City will provide educational information about how to access government sponsored and subsidized loans that have more flexible underwriting standards, as well as types of lenders to avoid.
- The City will work with lenders to ensure all lenders are trained on Fair Housing laws.

One Year Goals for the Number of Households to be Supported	
Homeless	625
Non-Homeless	18,000
Special-Needs	220
Total	**18,845**

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

One Year Goals for the Number of Households Supported Through	
Rehab of Existing Units	34
Total	34

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

Discussion

Affordable housing remains a key focus for the City of Las Cruces across its proposed funding and partnership initiatives.

AP-60 Public Housing – 91.220(h)

Introduction

The Mesilla Valley Housing Authority owns 248 units of public housing in four developments and has no plans to dispose of units in the next five years. The Housing Authority owns 40 Section 8 financed rental units as well. The Housing Authority has 75 VASH Vouchers, and 40 Family Unification vouchers, in addition to the 100 vouchers available throughout Dona Ana County. All units have been rolled into one for a housing inspection score. Inspections are conducted every 3 years. In 2018, the MVPCA units' score was: 88. Inspection scores are comprised of physical housing characteristics and building management. The Housing Authority owns 248 units of public housing in Las Cruces in four locations. Tres Arboles is a 64-unit family property, San Pedro Place is 38 units of senior and disabled housing, Walnut Grove is 100 units of family housing and Jardines Alegres is 47 units of elderly/disabled housing. All are low density properties that stay mostly full.

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

The Mesilla Valley Public Housing Authority intends to conduct demolition and/or disposition, conversion of Public Housing to Tenant-Based Assistance, conversion of Project-Based Assistance under RAD, and employ Project-Based vouchers to fulfill the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families in Las Cruces.

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

The Housing Authority has a Resident Advisory Board, and resident council boards for each of the four public housing developments. The Housing Authority has worked with private and public developers of housing to partner on Low Income Housing Tax Credit developments to expand the inventory of affordable rental properties available in Las Cruces

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

NA

Discussion

The Mesilla Valley Public Housing Authority recently completed a public housing plan to continue serving the needs of low- income, very low- income, and extremely low- income families in Las Cruces. In it, the Housing Authority has committed to expanding initiatives around Public Housing to Tenant-Based Assistance, conversion of Project-Based Assistance under RAD, and employment of Project-Based vouchers.

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

Introduction

Persons who are homeless and at-risk of homelessness in Las Cruces will be primarily assisted by the City through the provision of CDBG Public Services funds to homeless service and housing providers. Funds administered by the City of Las Cruces for activities that assist the homeless include the use of CDBG funds for public service activities, HOME funds for Tenant Based Rental Assistance, and HOME funds for eligible housing development activities. These agencies provide a variety of services including a homeless day shelter for services provided, homeless medical clinic, homeless childcare, legal services for homeless and near homeless, and funding to an emergency shelter for victims of domestic violence. Additionally, the City is the grantee of a HUD Continuum of Care Permanent Supportive Housing/Shelter Plus Care grant which provides rental housing subsidy to the homeless special needs population.

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

Program Year 2021 Public services funding to non-profit agencies to provide a variety of services including homeless services, emergency shelter for victims of domestic violence, childcare services, and advocacy for abused and neglected children and food rescue and distribution.

- Mesilla Valley Community of Hope will provide homeless day shelter services, housing assistance, mail, showers etc.
- Jardin de los Ninos will provide childcare services to homeless and near homeless children.
- Casa de Peregrinos will conduct food rescue to supplement their food distribution program.
- La Casa Inc will provide emergency shelter services for victims fleeing domestic violence.

MV CASA will provide case advocacy for abused and neglected children who are part of the foster care system in the 3rd district court system.

Mesilla Valley Community of Hope will assist approximately 530 persons. Jardin de los Ninos will assist approximately 220 children. Casa de Peregrinos will assist approximately 18,000 households. La Casa Inc will assist approximately 500 homeless victims of domestic violence. MVCASA will assist approximately 200 children.

Addressing the emergency shelter and transitional housing needs of homeless persons

La Casa domestic violence shelter can shelter up to 80 people and approximately 26 children for up to 90 days. This includes both men, women, and families. La Casa has transitional housing units which they own (5 units which are scattered site units). It provides non-residential support as well. The shelter itself is typically full about 80% of the time. The shelter expanded in 2009 due to an increasing need to assist more female and male victims of violence. The agency's transitional housing program assists 22 families with tenant based rental assistance through the Continuum of Care process. Residents and those seeking services must have proof of documentation or they cannot be assisted, which agency staff identifies as an issue for undocumented community members in need. The tenant based rental assistance provided through HOME funds allows up to 24-month stay. La Casa also provides non-residential counseling/case management, legal advocacy, immigration specialists to determine status, and a court ordered batterer program. La Casa has an MOU with Catholic Charities who is able to help undocumented persons and immigrants in Las Cruces.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Las Cruces and its partners provide a continuum of homeless facilities and services for individuals and families experiencing homelessness and those who are at risk of becoming homeless. Programs provided through the Continuum of Care include emergency shelter, supportive services, transitional housing, permanent supportive housing and Housing First (Rapid Rehousing). The New Mexico Coalition to End Homelessness (NMCEH) takes the lead in developing New Mexico's Continuum of Care Plan. NMCEH convenes and manages the Continuum of Care planning process and the Mesilla Valley Community of Hope provides multiple services for the homeless and chronically homeless population in Las Cruces.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City of Las Cruces and its partners provide a continuum of homeless facilities and services for individuals and families experiencing homelessness and those who are at risk of becoming homeless. Programs provided through the Continuum of Care include emergency shelter, supportive services, transitional housing, permanent supportive housing and Housing First (Rapid Rehousing). The New Mexico Coalition to End Homelessness (NMCEH) takes the lead in developing New Mexico's Continuum of Care Plan. NMCEH convenes and manages the Continuum of Care planning process and the Mesilla Valley Community of Hope provides multiple services for the homeless and chronically homeless population in Las Cruces.

Discussion

Coordinated efforts to provide funding and facilities to the non-profit agencies providing housing and needed services to the homeless population in the City of Las Cruces are on-going. City staff participates in regularly scheduled meetings to discuss facilities provided by the City and services to the homeless population. Opportunities to increase and improve services and address needs to the homeless population are discussed at various levels. On-going technical assistance is provided to the various agencies providing services to the homeless.

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

Introduction:

The City will continue to provide support for creating affordable homeownership and affordable rentals.

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

IMPEDIMENT 1: LACK OF KNOWLEDGE ABOUT FAIR HOUSING ROLES AND RESPONSIBILITIES OF CONSUMERS AND PROVIDERS.

ANALYSIS: Roles and responsibilities of both consumers and housing providers under federal and local Fair Housing rules can be complex and often up-to-date, accurate information is not readily available. Qualitative research through stakeholder interviews, community focus groups, and an online community survey revealed that Fair Housing laws are not widely known, and many community residents don't know who to turn to if they have questions or issues in Las Cruces. The City and many community organizations that work with housing issues report that they do train staff, but general awareness regarding Fair Housing in the community is low. The City would like to increase Fair Housing awareness, roles, and responsibilities for both consumers and providers. The actions outlined below are intended to increase the knowledge base of both consumers and producers.

IMPEDIMENT 2: DISCRIMINATION BY PROPERTY OWNERS AND MANAGERS, AGAINST PERSONS WITH DISABILITIES AND/OR HOUSING VOUCHER PROGRAMS LIMITS THESE GROUPS FROM EQUAL ACCESS TO HOUSING.

ANALYSIS: Key informants, community surveys and public meeting comments point to instances of discriminatory practices for individuals and households who have a member with a disability and/or a receipt of a housing voucher. Community focus groups and the community survey revealed that there is a significant stigma about people who have a housing voucher through the Section 8 or other programs. Many private landlords refuse to rent to those who have a housing voucher and with limited public housing options, many eligible individuals who have a housing voucher cannot find adequate housing. Additionally, many of the rental properties in Las Cruces are not accessible and many landlords are reluctant to allow tenants to make modifications to the property. There were several fair housing complaints filed with HUD involving individuals with disabilities.

IMPEDIMENT 3: THE INCREASING COST AND SCARCITY OF BOTH RENTAL AND FOR SALE HOUSING DISPROPORTIONATELY IMPACTS LOW INCOME HOUSEHOLDS AS QUANTIFIED IN THE CONSOLIDATED PLAN AND THE HOUSING CONCERNS SECTION OF THE ANALYSIS OF IMPEDIMENTS.

ANALYSIS: Approximately half of all renters in Las Cruces have one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing). Households earning less than 50% AMI are more likely to experience cost burden and severe cost burden than those earning high incomes, especially among renters. There is a severe lack of quality affordable rental units in Las Cruces and a hot housing market is only increasing the median sale price of homes in the City making homeownership harder for households earning less than the median income. The housing gap charts show that a major barrier to Fair Housing Choice is the lack of units available to households with limited incomes. The lack of affordable units, results in many residents who are cost burdened and cannot afford the units available in the market.

IMPEDIMENT 4: LOAN DENIAL RATES REMAIN RELATIVELY HIGH FOR SOME RACIAL/ETHNIC GROUPS.

Analysis: Although HMDA data is not conclusive, it does show some racial/ethnic groups may struggle more on the dream of homeownership. Loan denial rates show that American Indian or Alaska Native, Hispanic, and women have slightly higher loan denial rates than other groups. Table 39 shows underlying systemic racism that had hurt people of color for decades. Black or African America and American Indian or Alaska Native individuals are more likely to get denied a loan due to credit history.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Proposed Actions the City will take to address Impediment 1:

- The City will continue to be a partner with other agencies and programs to increase awareness of Fair Housing Laws and policies including those at the Federal level, State level and local level. The City will provide an updated Fair Housing website as part of the Las Cruces web portal. The Fair Housing website will contain necessary information in English and Spanish including Fair Housing Laws and Ordinances as well as information on agencies to contact and the steps needed to file a complaint. It will also contain the City's adopted Analysis of Impediments to Fair Housing Action Plan. The City will provide Fair Housing materials and all other informational documents related to its Community Development activities and reports in alternative formats if requested by a disabled person. Ongoing.
- As the administrator and technical assistance provider for Federal and local housing programs the City Community Development Department will work with subgrantees as well as private housing providers to ensure that housing consumers are dealt with in a non-discriminatory fashion as defined by Fair Housing rules. The City will provide printed and electronic information to landlords and property managers that they can pass on to prospective tenants and purchasers. This information will be a summary of the information contained on the City's Fair Housing website. Fair Housing information will be made available in alternative formats upon request. Ongoing.
- The City Community Development Department will partner with professional associations and fair housing agencies to provide community forums and meetings educating citizens on Fair Housing laws and their importance in ensuring equal access to housing and the programs and services the City provides. The City of Las Cruces Fair Housing Ordinance (Chapter 13: Article I) will also be explained and highlighted at public Fair Housing events. Annually.

Proposed Actions the City will take to address Impediment 2:

- The City of Las Cruces Community Development Department will continue its outreach and educational efforts to inform builders, property owners and landlords of the provisions and requirements that must be met in providing equal access to housing for the protected classes of people outlined above. The educational effort will include providing written and electronic information on how housing providers can ensure that advertising, screening processes, lease policies, and general interactions with those seeking housing are treated equally. The City educational effort will also include information for builders on ways to address accessibility requirements through the design and construction of accessible, adaptable units. The City will continue to partner with other agencies serving the Las Cruces area to educate property owners, Mesilla Valley Public Housing Authority, managers, and builders on their Fair Housing responsibilities. Partner agencies may include Las Cruces Homebuilders Association, Las Cruces Association of Realtors, New Mexico Human Rights Division, and local community organizations with involvement in Fair Housing Activities. Ongoing.
- Through online and printed Fair Housing materials, the City Community Development Director or designee, will assist complainants who wish to file a discrimination complaint, in filing the necessary forms and providing guidance and referrals on the process the City and other state and federal agencies will utilize in responding to complaints. Ongoing.
- The City will post Fair Housing Information at all facilities controlled by the City of Las Cruces. This effort will be extended to City subgrantees which provide housing services. Those agencies will be required to post the Fair Housing sign at all housing facilities assisted with local or federal funds. Ongoing.
- The City will enforce its Fair Housing Ordinance in cases of discrimination as prescribed in the Ordinance. Ongoing.
- The City will provide technical assistance and oversight to CDBG and HOME subgrantees to ensure that each agency has a compliant Affirmatively Furthering Fair Housing Marketing Plan (AFFHMP), if applicable. The City will monitor the use of the agency AFFHMP to determine the success of subgrantees in using the plan to encourage participation in housing activities by underserved populations. Ongoing.
- The City will monitor its communications and public outreach and funding activities to measure the effectiveness of its AFFHMP to ensure that underserved populations are actively recruited to participate in public meetings and housing programs and activities. Annually.

Proposed Actions the City will take to address Impediment 3:

- The City will examine current planning and development review procedures to provide fast tracking and concurrent review of affordable rental projects. Elevate Las Cruces has provided some guidelines on affordable housing going forward. The City will work with its stakeholders to update its Affordable Housing Ordinance that more clearly outlines what incentives, concessions and enhancements it will make available to increase the production of affordable rental housing that meets the needs of those with the greatest challenges. Annually.
- The City will continue to serve as lead convener of state level and federal agencies and private sources of capital to create a more robust set of tools to address the development cost of new housing. This enhanced finance approach will focus on Low-income Housing Tax Credits, HOME Investment Partnership Funding, various supportive housing financing sources, various tax-

exempt bonds including General Obligation Bonds and affordable loans from lenders doing business in the community. Ongoing.

- The City will review density limitations, minimum lot sizes and other regulations that may constrict housing providers' ability to produce both smaller apartments and for sale homes for sectors of the market which cannot presently afford the products available in Las Cruces. Ongoing.
- Development Readiness Measures: The City through its mapping and property records system will identify vacant and underutilized residentially zoned properties in zoning areas that have adequate infrastructure to support greater densities for residential uses. This action could effectively steer development to sites that are considered suitable by the locality and expedite the pace at which affordable development occurs. Annually.
- The City will continue to provide limited financial assistance to households who qualify for long term mortgages. The City will utilize its Impact Fee Deferral policies for starter homes that meet the City definition of affordable housing. Annually.
- The City will track the numbers of those populations which receive assistance to alleviate the identified housing problems. Annually.
- The City will update its Affordable Housing Plan to review and develop strategies, goals, and measures to encourage and track the development of affordable housing in Las Cruces. 2021-2022

Proposed Actions the City will take to address Impediment 4:

- The City will support organizations that provide credit and homebuying counseling, such as Tierra del Sol and the TYWCA to ensure that the programs are geographically targeted to areas in the community where loan denial rates are the highest.
- The City will provide educational information about how to access government sponsored and subsidized loans that have more flexible underwriting standards, as well as types of lenders to avoid.
- The City will work with lenders to ensure all lenders are trained on Fair Housing laws.

Discussion:

The City of Las Cruces will work to ensure the goals and strategies of affiliated partners, such as the Elevate Las Cruces Comprehensive Plan and the Mesilla Valley Housing Authority's Housing Plan, are collaborative with the goals and strategies laid out in the Consolidated Plan project.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Las Cruces identifies several special needs groups that are served in a variety of settings. These populations include persons with physical disabilities, intellectual and developmental disabilities (IDD), mental health disabilities, substance use disorders (SUD), elderly, frail elderly, people with HIV/AIDS, victims of domestic violence, veterans, at-risk youth, migrant/seasonal workers and their families, and immigrant populations. Special needs communities often encounter financial barriers and access/availability of appropriate housing and services.

Actions planned to address obstacles to meeting underserved needs

Housing services:

- Emergency Financial assistance – rental and/or mortgage and utility assistance.
- HOPWA (Housing Opportunities for Persons with AIDS) – long term or short-term assistance for partial or full housing assistance which is determined by need, income, and availability.

Other supportive services:

- Medical and Non-medical case management services
- Early intervention services (EIS)
- ADAP – AIDS Drug Assistance Program
- AIDS Pharmaceutical Assistance
- Health Insurance Premium assistance
- Co-pay assistance for contracted HIV providers and lab visits
- Oral health care
- Food Bank/Food cards
- Medical Transportation (travel reimbursement/bus pass)
- Health education/Risk Reduction
- Referrals for Substance use, Harm Reduction, Behavioral Health, Nutrition, Psychosocial Support Services

Client's must be enrolled into Ryan White Services to be eligible to receive supportive services (this does not include HOPWA). Client's must be under the 400% FPL, a resident of New Mexico and be diagnosed with HIV to qualify. Once enrolled into services, a medical case manager will meet with the client to complete a detailed assessment of the client's needs. The assessment is then utilized to complete an acuity scale which is then used to determine the supportive services the client needs.

Actions planned to foster and maintain affordable housing

HOME and CDBG funds will be used to construct new for-sale housing, preserve existing affordable owner-occupied housing, and provide TBRA. The City of Las Cruces works with the local housing authority, nonprofit housing agencies and private developers to expand and preserve the affordable housing stock in Las Cruces.

Actions planned to reduce lead-based paint hazards

Through the City's home rehabilitation program, homeowners occupying units with lead-based paint will have the hazard removed when their units are rehabilitated. This program only benefits low to moderate income owners in the City. Through the creation of new affordable rental and owner-occupied housing, families and individuals occupying units with lead-based paint will have greater opportunities to relocate into lead-free units.

Actions planned to reduce the number of poverty-level families

The City of Las Cruces wants to address poverty by providing access to affordable housing, revitalizing neighborhoods, and developing mixed use sites throughout the city. This plan will serve as the launching pad for an anti-poverty strategy. It is through housing the city can fulfill its anti-poverty initiatives, while making the city more desirable from a housing market and business development standpoint. The Las Cruces City Council is considering a General Obligation Bond to secure funding for affordable housing. For every dollar of city investment, four dollars of non-city investment are secured. This goal also aligns with the city's Elevate comprehensive plan, which identified goals of Economic Equity, Attainable Housing, Serving Underserved Populations, Diversification, and Entrepreneurship.

Actions planned to develop institutional structure

The City of Las Cruces will need to make substantial changes to its Las Cruces Development Code to achieve sustainable growth through its Elevate Las Cruces Comprehensive Plan. Elevate Las Cruces recommends that the City revise its Development Code using a form-based code approach that incorporates transect-based principles. The transect-based approach to zoning is already being utilized by the City within the Downtown Development Code. Key policies related to Housing Choice are identified and reviewed below.

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

The City will provide public service funding over the next year to local non-profit funds for agencies that serve special needs populations, primarily to the homeless, victims of domestic violence, the disabled, and low-income youth and young adults. Additionally, the City will provide HOME funds to private, non-profit housing providers for the development of single-family housing and affordable rental development(s).

The City of Las Cruces requires that no more than 50% of CDBG funds may be dedicated to infrastructure, public facilities, or economic development activities that result in capital or facility improvements and that the remaining 50% or more may come from other sources. Other sources can include other federal, state, local, and private funds. For improvements made to City-owned facilities that are occupied by non-city operated programs, the other 50% must come from other federal, state and private (non-City of Las Cruces) sources or will provide full funding from CDBG funds with 50% of the funding provided as loan, resulting in program income upon payback.

Discussion:

The City of Las Cruces' strategy to foster economic growth by supplying accessible mixed use housing and business opportunity sites will ensure the needs of its most vulnerable populations are met while keeping an eye on growing the City in a sustainable fashion.

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

Introduction:

As a participating jurisdiction the allocation of CDBG and HOME funds provided to the City of Las Cruces are used in accordance with the guidelines provided by the specific programs. Projects are selected based upon need, capacity, and funding availability. See Discussion for more detail.

The City of Las Cruces adheres to HUD regulations for monitoring requirements and has an adopted Evaluation & Monitoring Guide which identifies the methods in which applications and agencies will be determined to be evaluated each year. In addition to the Evaluation Guide, which determines the number of monitoring reviews that are to be accomplished each year, the Program Monitoring and Compliance staff is charged with conducting the monitoring visits for each agency including sub-recipients, sponsors or administering agents each year as applicable. The monitoring conducted includes both financial and programmatic review in accordance with the requirements of the CDBG, HOME, and applicable OMB circulars. This is in addition to technical assistance provided by the City's HOME, CDBG and Permanent Supportive Housing Program staff.

Goals and objectives identified in the Consolidated Plan are reviewed prior to awarding funds for proposed plans and projects to ensure that the proposed project meets identified goals and objectives of the plan. This process includes underwriting and risk assessments. To ensure timeliness of project expenditures City staff review applicable IDIS reports for HOME and CDBG projects. Written agreements with outside agencies for all programs include specific expenditure requirements as well as project completion deadlines. For HOME projects City staff follows additional guidelines per CPD notice 07-06.

To perform the actual monitoring visit, City staff use Community Planning and Development (CPD) Handbook guideline/exhibit information as applicable for both HOME/CHDO, CDBG, and CDBG Public Services as required in the regulations for each of the programs.

Generally, for all on-site reviews there is a full record(s) review (review of program participant eligibility and supporting documentation), a complete Housing Quality Standards (HQS) for HOME multi-family, TBRA, and SHP rentals, and a walk-through of HOME single-family homes under construction or un-occupied, but where construction has been completed. These on-site inspections ensure long-term compliance with housing codes. If there are problems or issues beyond Program staff's expertise, other City Departments may be contacted. Once the review is complete, a written follow-up letter is provided to the agency, noting any Findings, Concerns, Observations, and/or to the Sub-recipient, with appropriate due dates for correction/compliance as applicable.

For Program Year 2021, City staff will begin scheduling on-site monitoring visits the 3rd quarter of the program year per the monitoring schedule spreadsheet for the programs. Normally, monitoring is complete for all projects during the first quarter of the next program year.

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	35,000
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
Total Program Income:	**35,000**

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

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:

None

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:

The City files a Deed Restriction and Covenants agreement against the units that are HOME-assisted via grants for the acquisition of land and new construction of individual single family owner-occupied units. Following a resale provision, during the period of affordability, that restricts the purchase price and ensures the original HOME-assisted owner a fair return on investment. The full resale provisions detailed in the Deed Restriction and Covenants agreement filed against the HOME-assisted units can be found in Appendix "B" attached in the Grantee Unique Appendices of this document.

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:

For single-family owner-occupied units that are provided HOME funds for direct down payment, the City files a Deed Restriction and Covenants agreement that contains resale/recapture provisions.

The City's resale recapture requirements are provided in appendix B.

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:

The City does not have plans in place at this time to use HOME funds for the refinancing of existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Housing Trust Fund (HTF)

Reference 24 CFR 91.220(l)(5)

1. Distribution of Funds

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. **Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

6. **Resale or Recapture Guidelines.** Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. **HTF Affordable Homeownership Limits.** If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

8. **Limited Beneficiaries or Preferences.** Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. **Refinancing of Existing Debt.** Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a

minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A."

Discussion:

The City of Las Cruces follows a Standard Operating Procedure for competitive Requests for Proposals (RFPs) that is in accordance with 24 CFR Part 85.36(d)(3) and the City's Procurement Code 24.92. RFPs for CDBG and HOME applications will be publicized annually, and all evaluation factors and their relevant importance will be included. Applicants must first submit a standardized Letter of Intent (LOI) which must be received by the published deadline. Staff will review submitted LOIs for terms and conditions of the RFP, grant program guidelines and registration and debarment, and applicable program regulations. Each applicant will be notified in writing of acceptance or rejection of the LOI. If accepted, City staff will inform an applicant for which program the LOI will be considered and provide a blank RFP application for that program to the applicant.

RFPs are accepted each year for CDBG Public Services, and all other HOME and CDBG activities. Each will be reviewed for technical, subjective and risk analysis by City staff according to program guidelines. At completion of the review, City staff will present a CDBG &HOME summary to the Community Administering Department Director for review and concurrence. City staff will issue a preliminary funding award letter, subject to City Council final approval, or issue a letter of rejection. After council action is completed, City staff will notify each applicant of formal City Council action and the award amount. CDBG Public Services applications are processed for recommended approvals by the Health and Human Services Advisory Committee.

For Program Year 2021 funding, the City of Las Cruces published a notice of funds available and the RFP process that let applicants know that the RFP LOI would be available on November 16, 2020. LOIs were due back to the City no later than 4:30 pm on December 2nd, 2020. City staff reviewed LOIs, notified applicants who were eligible to submit an RFP for a specific project or program, and City Council approved projects and the Annual Action Plan on May 3, 2021.

Median Area Purchase Price (HOME Homeownership Value Limits)

The City of Las Cruces uses the HOME homeownership value limits provided by HUD for newly constructed housing and for existing housing. HUD provides limits for affordable newly constructed housing based on 95% of the median purchase price for the area using FHA single-family mortgage program data with a minimum limit based on 95% of the U.S. median purchase price for new construction or rehabilitation of owner-occupied single-family housing in the jurisdiction.

Changing conditions provision. As market changes occur within Las Cruces, the City will re-dedicate funding sources to address the market needs in other areas.

Please see the Grantee Specific Appendixes for a description of CDBG special benefit area designation status.

Analysis of Impediments to Fair Housing Choice

DRAFT FOR PUBLIC COMMENT

Prepared by:

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90 Bridge Street, Suite 216
Westbrook, ME 04092

Prepared For:

City of Las Cruces
Housing and Neighborhood Services

March 15, 2021

CONTENTS

SECTION 1: INTRODUCTION AND EXECUTIVE SUMMARY OF ANALYSIS

The U.S. Department of Housing and Urban Development (HUD) imposes an obligation to affirmatively further fair housing on recipients of certain HUD funding, which includes conducting an analysis of assessment of fair housing. As a Community Development Block Grant (CDBG) entitlement city, the City of Las Cruces is required to complete an Analysis of Impediments to Fair Housing every five years in junction with its Consolidated Plan requirements in order to receive CDBG and HOME grant funding from HUD.

The purpose of this Analysis of Impediments report is to identify barriers to fair housing faced by protected classes of citizens. This report describes how public policies, laws, and actions may affect housing choice or impede fair access to housing.

A. Who Conducted

The City of Las Cruces hired Crescendo Consulting Group to conduct its 2021-2015 Consolidated Plan, 2021 Annual Action Plan, and Analysis of Impediments to Fair Housing. Based in Westbrook, Maine, Crescendo Consulting Group has over 20 years of community needs assessment, consolidated plan and housing study, and population health research. The Consolidated Plan and Analysis of Impediments to Fair Housing work was completed by the following staff members:

- Katelyn Michaud, MPH, Research and Communications Manager
- Jeremy Vandroff, Project Support Specialist
- Scott Good, MBA, Managing Principal

B. Participants

The Analysis of Impediments of Fair Housing utilized the Consolidated Plan Citizen Participant Plan to ensure Las Cruces community members were involved in the research process through community stakeholder interviews, community focus groups, and online community survey. Over 1,200 community members participated in the process.

C. Methodology Used

The 2021 Analysis of Impediments utilized a mix-method quantitative and qualitative approach to identify barriers to fair housing faced by protected classes of citizens. This report includes a review of City of Las Cruces laws, regulations, and policies followed by an analysis of how these policies might impact the location, availability, and accessibility of housing. It also identifies lending practices and household economic conditions that affect housing choice, patterns of occupancy and location of public and government assisted housing, possible forms of discrimination and other factors impacting fair housing.

Crescendo Consulting Group utilized its experience and knowledge regarding fair housing issues in writing this report. The following steps were taken to formulate the report:

- The City of Las Cruces' 2016 Analysis of Impediments to Fair Housing Choice report was examined and analyzed.

- Extensive secondary research was conducted using various publicly available resources such as the U.S. Census Bureau, HUD, the City of Las Cruces, and others.
- Over 60 community stakeholder interviews and eight public community focus groups.
- Online community survey of X community residents.
- A draft was published for public comments and feedback, four public hearings to review the plan were held on March 30, 31, and April 1, 2021, and feedback was solicited for 30 days. [Add feedback received after public comment period]
- A formal adoption hearing was scheduled for May 2nd and the AI was adopted.
- The final document was prepared for submittal to HUD.

The purpose of this Analysis of Impediments is to:

- Review the data and impediments identified in the previous 2016 report.
- Determine if the 2016 impediments still exist and if new impediments must be identified.
- Review actions taken and evaluated the effectiveness of the actions.
- Identify any new impediments and make recommendations on actions to address the impediments.

The actions suggested are intended to:

- Analyze and eliminate housing discrimination in the city of Las Cruces.
- Promote fair housing choice for all persons.
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Encourage the construction of housing that is physically accessible to persons with disabilities.
- Facilitate community compliance with federal and state fair housing laws.

Disclaimer: The most recent data available was always used to complete the 2021-2025 Consolidated Plan and Analysis of Impediments to Fair Housing. The most recent HUD CHAS data was 2013-2017 data while the U.S. Census Bureau American Community Survey (ACS) 1-Year Estimates for 2019 were used. Additional 2019 and/or 2020 (if available) data was provided by Mesilla Valley Public Housing Authority, Mesilla Valley Community of Hope, and other community partners as needed to complete the report.

D. Who Funded

The Analysis of Impediments to Fair Housing Choice was funded by the City of Las Cruces through City funds.

E. Conclusions

As a result of the research and analysis conducted for this report, Crescendo Consulting Group has identified possible barriers to fair housing choice in Las Cruces. Accompanying the listing of impediments to fair housing choice, are actions which the City of Las Cruces proposes to undertake to ameliorate the identified impediments to fair housing choice. The impediments to Fair Housing Choice and recommended actions listed below have been identified through the Public Citizen Participation Plan adopted by the City. These impediments are not listed in any particular order of priority. Each action includes a target time period for the action to be undertaken and completed. Some actions are noted as ongoing. The 2021 Impediments listing includes and expands upon the Impediments identified in the 2011 and 2016 Impediments report.

2021 Impediments to Fair Housing Choice – City of Las Cruces

The impediments to Fair Housing Choice and recommended actions listed below have been identified through the preparation of this report. These impediments are not listed in any particular order of priority. Each action includes a target time period for the action to be undertaken and completed. Some actions are noted as ongoing. The 2021 Impediments listing includes and expands upon the Impediments identified in the 2016 Impediments report with the exception of the 2016 Impediment, "Housing consumers with Limited English Proficiency have difficulty in understanding and accessing information on Fair Housing" (See assessment of 2016 Impediments). The 2021 listing reflects current conditions and concerns that exist in the community.

IMPEDIMENT 1: LACK OF KNOWLEDGE ABOUT FAIR HOUSING ROLES AND RESPONSIBILITIES OF CONSUMERS AND PROVIDERS.

ANALYSIS: Roles and responsibilities of both consumers and housing providers under federal and local Fair Housing rules can be complex and often up-to-date, accurate information is not readily available. Qualitative research through stakeholder interviews, community focus groups, and an online community survey revealed that Fair Housing laws are not widely known, and many community residents don't know who to turn to if they have questions or issues in Las Cruces. The City and many community organizations that work with housing issues report that they do train staff, but general awareness regarding Fair Housing in the community is low. The City would like to increase Fair Housing awareness, roles, and responsibilities for both consumers and providers. The actions outlined below are intended to increase the knowledge base of both consumers and producers.

Proposed Actions the City will take to address Impediment 1:

- The City will continue to be a partner with other agencies and programs to increase awareness of Fair Housing Laws and policies including those at the Federal level, State level and local level. The City will provide an updated Fair Housing website as part of the Las Cruces web portal. The Fair Housing website will contain necessary information in English and Spanish including Fair Housing Laws and Ordinances as well as information on agencies to contact and the steps needed to file a complaint. It will also contain the City's adopted Analysis of Impediments to Fair Housing Action Plan. The City will provide Fair Housing materials and all other informational documents related to its Community Development activities and reports in alternative formats if requested by a disabled person. Ongoing.
- As the administrator and technical assistance provider for Federal and local housing programs the City Community Development Department will work with subgrantees as well as private housing providers to ensure that housing consumers are dealt with in a non-discriminatory fashion as defined by Fair Housing rules. The City will provide printed and electronic information to landlords and property managers that they can pass on to prospective tenants and purchasers. This information will be a brief summary of the information contained on the City's Fair Housing website. Fair Housing information will be made available in alternative formats upon request. Ongoing.
- The City Community Development Department will partner with professional associations and fair housing agencies to provide community forums and meetings educating citizens on Fair Housing laws and their importance in ensuring equal access to housing and the programs and services the City provides. The City of Las Cruces Fair Housing Ordinance (Chapter 13: Article I) will also be explained and highlighted at public Fair Housing events. Annually.

IMPEDIMENT 2: DISCRIMINATION BY PROPERTY OWNERS AND MANAGERS, AGAINST PERSONS WITH DISABILITIES AND/OR HOUSING VOUCHER PROGRAMS LIMITS THESE GROUPS FROM EQUAL ACCESS TO HOUSING.

ANALYSIS: Key informants, community surveys and public meeting comments point to instances of discriminatory practices for individuals and households who have a member with a disability and/or a receipt of a housing voucher. Community focus groups and the community survey revealed that there is a significant stigma about people who have a housing voucher through the Section 8 or other programs. Many private landlords refuse to rent to those who have a housing voucher and with limited public housing options, many eligible individuals who have a housing voucher cannot find adequate housing. Additionally, many of the rental properties in Las Cruces are not accessible and many landlords are reluctant to allow tenants to make modifications to the property. There were several fair housing complaints filed with HUD involving individuals with disabilities.

Proposed Actions the City will take to address Impediment 2:

- The City of Las Cruces Community Development Department will continue its outreach and educational efforts to inform builders, property owners and landlords of the provisions and requirements that must be met in providing equal access to housing for the protected classes of people outlined above. The educational effort will include providing written and electronic information on how housing providers can ensure that advertising, screening processes, lease policies, and general interactions with those seeking housing are treated equally. The City educational effort will also include information for builders on ways to address accessibility requirements through the design and construction of accessible, adaptable units. The City will continue to partner with other agencies serving the Las Cruces area to educate property owners, Mesilla Valley Public Housing Authority, managers, and builders on their Fair Housing responsibilities. Partner agencies may include Las Cruces Homebuilders Association, Las Cruces Association of Realtors, New Mexico Human Rights Division, and local community organizations with involvement in Fair Housing Activities. Ongoing.
- Through online and printed Fair Housing materials, the City Community Development Director or designee, will assist complainants who wish to file a discrimination complaint, in filing the necessary forms and providing guidance and referrals on the process the City and other state and federal agencies will utilize in responding to complaints. Ongoing.
- The City will post Fair Housing Information at all facilities controlled by the City of Las Cruces. This effort will be extended to City subgrantees which provide housing services. Those agencies will be required to post the Fair Housing sign at all housing facilities assisted with local or federal funds. Ongoing.
- The City will enforce its Fair Housing Ordinance in cases of discrimination as prescribed in the Ordinance. Ongoing.
- The City will provide technical assistance and oversight to CDBG and HOME subgrantees to ensure that each agency has a compliant Affirmatively Furthering Fair Housing Marketing Plan (AFFHMP), if applicable. The City will monitor the use of the agency AFFHMP to determine the success of subgrantees in using the plan to encourage participation in housing activities by underserved populations. Ongoing.
- The City will monitor its communications and public outreach and funding activities to measure the effectiveness of its AFFHMP to ensure that underserved populations are actively recruited to participate in public meetings and housing programs and activities. Annually.

IMPEDIMENT 3: THE INCREASING COST AND SCARCITY OF BOTH RENTAL AND FOR SALE HOUSING DISPROPORTIONATELY IMPACTS LOW INCOME HOUSEHOLDS AS QUANTIFIED IN THE CONSOLIDATED PLAN AND THE HOUSING CONCERNS SECTION OF THE ANALYSIS OF IMPEDIMENTS.

ANALYSIS: Approximately half of all renters in Las Cruces have one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing). Households earning less than 50% AMI are more likely to experience cost burden and severe cost burden than those earning high incomes, especially among renters. There is a severe lack of quality affordable rental units in Las Cruces and a hot housing market is only increasing the median sale price of homes in the City making homeownership harder for households earning less than the median income. The housing gap charts show that a major barrier to Fair Housing Choice is the lack of units available to households with limited incomes. The lack of affordable units, results in many residents who are cost burdened and cannot afford the units available in the market.

Proposed Actions the City will take to address Impediment 3:

- The City will examine current planning and development review procedures to provide fast tracking and concurrent review of affordable rental projects. Elevate Las Cruces has provided some guidelines on affordable housing going forward. The City will work with its stakeholders to update its Affordable Housing Ordinance that more clearly outlines what incentives, concessions and enhancements it will make available to increase the production of affordable rental housing that meets the needs of those with the greatest challenges. Annually.
- The City will continue to serve as lead convener of state level and federal agencies and private sources of capital to create a more robust set of tools to address the development cost of new housing. This enhanced finance approach will focus on Low-income Housing Tax Credits, HOME Investment Partnership Funding, various supportive housing financing sources, various tax exempt bonds including General Obligation Bonds and affordable loans from lenders doing business in the community. Ongoing.
- The City will review density limitations, minimum lot sizes and other regulations that may constrict housing providers' ability to produce both smaller apartments and for sale homes for sectors of the market which cannot presently afford the products available in Las Cruces. Ongoing.
- Development Readiness Measures: The City through its mapping and property records system will identify vacant and underutilized residentially-zoned properties in zoning areas that have adequate infrastructure to support greater densities for residential uses. This action could effectively steer development to sites that are considered suitable by the locality and expedite the pace at which affordable development occurs. Annually.
- The City will continue to provide limited financial assistance to households who qualify for long term mortgages. The City will utilize its Impact Fee Deferral policies for starter homes that meet the City definition of affordable housing. Annually.
- The City will track the numbers of those populations which receive assistance to alleviate the identified housing problems. Annually.
- The City will update its Affordable Housing Plan to review and develop strategies, goals, and measures to encourage and track the development of affordable housing in Las Cruces. 2021-2022.

IMPEDIMENT 4: LOAN DENIAL RATES REMAIN RELATIVELY HIGH FOR SOME RACIAL/ETHNIC GROUPS.

Analysis: Although HMDA data is not conclusive, it does show some racial/ethnic groups may struggle more on the dream to homeownership. Loan denial rates show that American Indian or Alaska Native, Hispanic, and women have slightly higher loan denial rates than other groups. Table 39 shows underlying systemic racism that had hurt people of color for decades. Black or African America and American Indian or Alaska Native individuals are more likely to get denied a loan due to credit history.

Proposed Actions the City will take to address Impediment 4:

- The City will support organizations that provide credit and homebuying counseling, such as Tierra del Sol to ensure that the programs are geographically targeted to areas in the community where loan denial rates are the highest.
- The City will provide educational information about how to access government sponsored and subsidized loans that have more flexible underwriting standards, as well as types of lenders to avoid.
- The City will work with lenders to ensure all lenders are trained on Fair Housing laws.

Section II: Jurisdictional Background Information

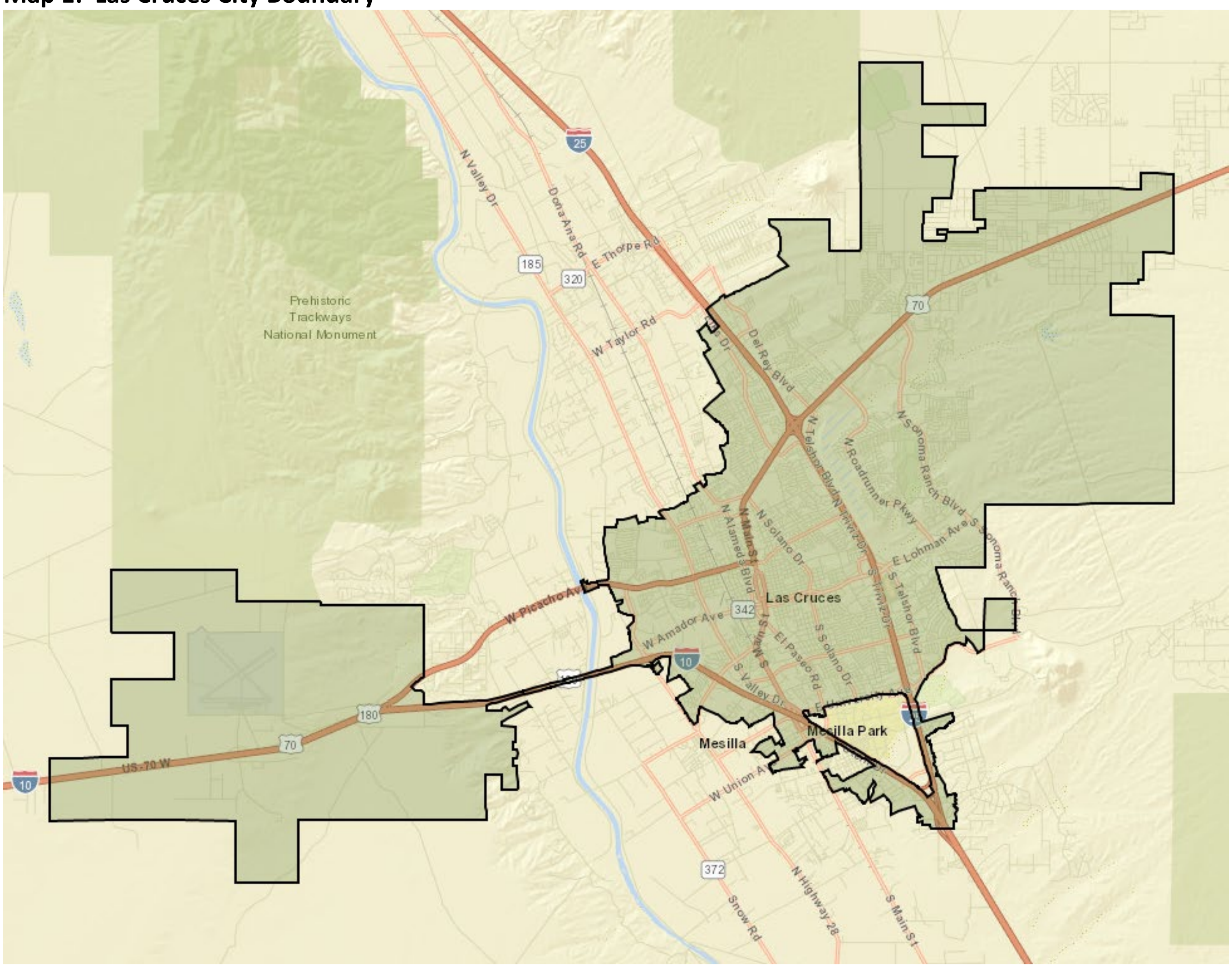
SECTION II: DATA COLLECTION AND ANALYSIS

Demographics

Located in southern New Mexico in the agricultural region on the Rio Grande floodplain on the edge of the Chihuahuan Desert, the city of Las Cruces is New Mexico's second largest city. This once small community was known for its rich farmland and New Mexico State University (the only land based grant university) in New Mexico. The settlement of Las Cruces was created as an overflow area from the colony of Doña Ana. Incorporated in 1907, the 1910 federal census recorded the Las Cruces population at 3,386.

The city has grown rapidly, especially since 1960. In 1960, the city occupied 10.79 square miles with a population of 29,367. Today, the city is projected to encompass 77.03 square miles, with a population of 103,436 residents.

Map 1: Las Cruces City Boundary



Source: ERSI

POPULATION

As of 2019, 103,436 people reside in Las Cruces, up from 98,239 in 2010. During the past 10 years, Las Cruces had a population growth of 5.3 percent. The average annual growth rate was higher between 2000 and 2010. Population growth is expected at an annual rate of 3.9 percent between 2020 and 2025, a higher rate than the state, but slightly lower than Dona Ana County.

Table 1: Las Cruces Total Population, 2010 - 2020

Demographics	Base Year: 2010	Most Recent Year: 2019	% Change
Population	98,239	103,436	+5.3%
Households	38,430	40,185	+4.5%
Median Income	$36,202	$45,130	+24.6%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 1-Year Estimates

Between the year 2010 and 2019, the population in Las Cruces increased 5.3 percent. During the same period, median household incomes increased 24.6 percent.

Table 2: Total Population, 2010 - 2020

Measure	Las Cruces	Dona Ana County	New Mexico
2010	98,239	209,233	2,059,179
2020	103,346	218,195	2,096,829
Total Change ('10 – '20)	5.8%	4.3%	1.8%
2025 (Projected)	107,521	227,725	2,155,641
Projected Change ('20-'25)	+3.9%	+4.3%	+2.7%

Source: American Community Survey, 2019, 2010 1-Year Estimates

POPULATION BY AGE

The following table shows the number of residents in Las Cruces by age group. The largest shifts in population between 2010 and 2020 were in the 65 – 84 and 85 and over age groups. Between the two age groups, there is a net increase of 11.1 percent. Based on the data, there is an apparent "brain drain" occurring in Las Cruces where high school graduates left Las Cruces for high education and ultimately settle elsewhere where they likely have better job opportunities and higher wages. Las Cruces is attracting more seniors in area. As seniors ages, they begin to have more unique health, housing, and social needs.

Table 3: Percent Population by Age, 2000 - 2020

Age	2010	2020	Percent Change '10 - '20
0 - 17	23.0%	24.1%	+4.7%
18 - 24	10.9%	10.3%	-5.5%
25 - 44	25.1%	24.6%	-1.9%
45 - 64	23.4%	21.0%	-10.2%
65 - 84	11.5%	14.8%	+28.7%
85 and over	1.7%	1.4%	-17.6%

Source: American Community Survey, 2010, 2019 1-Year Estimates

POPULATION BY RACE, ETHNICITY, AND LIMITED ENGLISH PROFICIENCY

As 2019 American Community Survey data shows below, over 80 percent of all Las Cruces residents identify their race as white, and 58.5 percent consider themselves Hispanic/Latino. The percent of population who identify themselves as non-white is approximately the same throughout Dona Ana County, though the percentage of Hispanic/Latino population is lower than throughout the County.

Table 4: Population by Race, 2019

Race	Doña Ana County		Las Cruces	
	Total Population	**% by Race**	**Total Population**	**% by Race**
White	174,131	79.8%	83,391	80.6%
Black or African American	3,881	1.8%	2,945	2.8%
American Indian and Alaska Native	2,930	1.3%	1,916	1.9%
Asian	3,135	1.4%	2,155	2.1%
Native Hawaiian and Other Pacific Islander	229	0.1%	229	0.2%
Some other race alone	29,566	13.6%	9,671	9.3%
Two or more races	4,323	2.0%	3,129	3.0%
Total	218,195		103,436	

Source: American Community Survey, 2019 1-Year Estimates

Table 5: Population by Ethnicity, 2019

Ethnicity	Doña Ana County		Las Cruces	
	Total Population	% by Ethnicity	Total Population	% by Ethnicity
Hispanic or Latino	150,033	68.8%	60,471	58.5%
Mexican	133,073	61.0%%	NA	
Puerto Rican	554	0.3%	NA	
Cuban	810	0.4%	NA	
Other Hispanic or Latino	15,596	7.1%	NA	
Total	150,033		60,471	

Source: American Community Survey, 2019 1-Year Estimates

Table 6: Population by Race/Ethnicity, Las Cruces 2010-2019

Measure	2010	2019
White	89.9%	80.6%
Black or African American	1.5%	2.8%
American Indian and Alaska Native	1.7%	1.9%
Asian	1.1%	2.1%
Hispanic or Latino	58.3%	58.5%

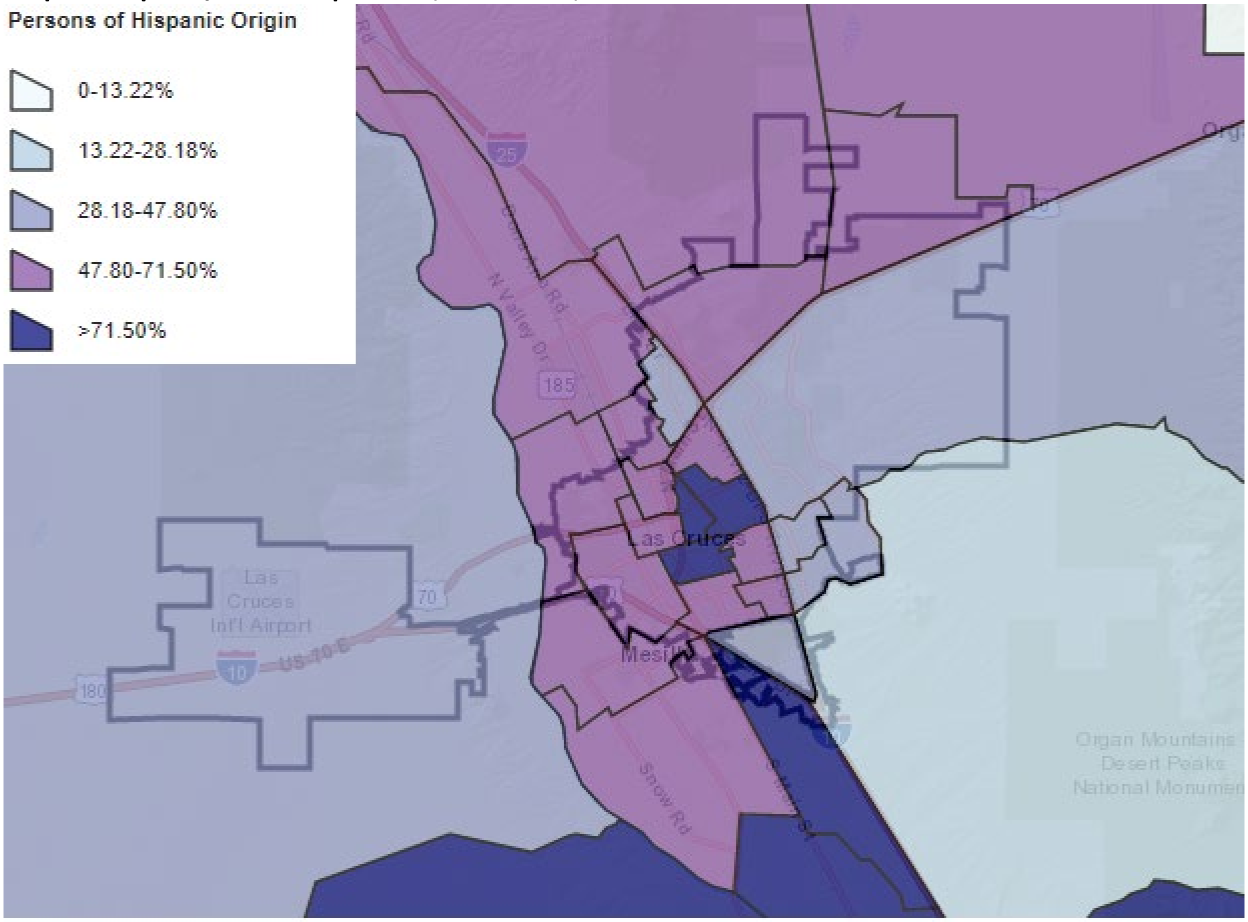
Source: American Community Survey, 2010,2019 1-Year Estimates

Over the past 10 years, Las Cruces is slowly becoming more diverse. The White population has decreased 10.3 percent while the Asian population has nearly doubled, and the Black or African American population has increased by 86.7 percent. The American Indian and Alaska Native and Hispanic or Latino population has remained similar.

The following map shows the concentrations of Hispanic households in Las Cruces. Within the city of Las Cruces, 51.7% of households identify as Hispanic or Latino. It is not surprising, then, to see that in 61.5% of census tracts within the City (16 of 26), more than 50% of residents are Hispanic or Latino.

To help communities understand racial and/or ethnically-concentrated areas that may be socioeconomically disadvantaged, HUD developed its R/ECAP model. HUD defines Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: 1) the non-white population comprises 50 percent or more of the total population and 2) the percentage of individuals living in households with incomes become poverty rate is either a) 40 percent or above or b) three times the average poverty rate for the metropolitan area, whichever is lower.

Map 2: Hispanic/Latino Population, Las Cruces, 2019



SOURCE: CPD Maps

Approximately 11 percent of Las Cruces' population is foreign born as seen in Table 7. Half of these individuals are not U.S. Citizens. Considering the proximity of Las Cruces to the border with Mexico, it is not surprising to see so many residents who are not yet citizens. The percentage of Las Cruces residents who were not born in the U.S. has been slowly declining since 2010.

Table 7: Place of Birth, 2010-2019

	2010		2019	
	Number	Percent	Number	Percent
Native	80,673	86.8%	92,434	89.4%
Born in state of residence	41,889	45.1%	51,811	50.1%
Born in other state in the United States	37,644	40.5%	38,881	37.6%
Born outside the United States	1,140	1.2%	1,742	1.7&%
Foreign born	12,224	13.2%	11,002	10.6%
Naturalized U.S. citizen	4,295	4.6%	5,184	5.0%
Not a U.S. citizen	7,929	8.5%	5,818	5.6%
Total Population	92,897		103,436	

Source: American Community Survey, 2019 1-Year Estimates

Table 8 shows that in Las Cruces, 62.1 percent of the population speaks only English while 37.9 percent speak a language other than English. Of those who speak a language other than English, 91.4 percent speak Spanish.

Table 8: Language Spoken for Population Age 18 and Up, 2019

	Las Cruces Population Aged 18+	% of Total	Speak English "very well"	Speak English less than "very well"
Speak only English	46,531	62.1%		
Speak a Language other than English	28,402	37.9%	24,675	3,727
Total	74,933		24,675	3,727

Source: American Community Survey, 2019 1-Year Estimates

Table 9: Languages Spoken, Las Cruces

Speak a Language Other Than English	
Spanish	91.4%
Other languages	8.6%

Source: American Community Survey, 2019 1-Year Estimates

Housing and other social programs in Las Cruces must be aware of the language and cultural barriers that may exist for foreign born and non-English speaking residents to access City and other services within the community.

POPULATION WITH DISABILITIES

The American Community Survey collects data related to disability status. In 2019, there was a total of 30,139 persons or 14.9 percent with at least one disability living in Las Cruces. The top difficulty or disability in Las Cruces is independent living difficulty and ambulatory difficulty, which are often interrelated, especially when it comes to housing.

Table 10: Persons with Disabilities in Las Cruces, 2019

	Under 5	5 to 17	18 to 64	65 to 74	75+	Total Population
Any Difficulty	0.8%	10.6%	25.2%	25.7%	53.7%	14.9%
Hearing Difficulty	0.8%	1.2%	9.1%	6.2%	33.0%	5.5%
Vision Difficulty	0.0%	2.0%	1.4%	2.5%	8.1%	1.9%
Cognitive Difficulty	ND	9.0%	4.1%	7.0%	22.6%	6.4%
Ambulatory Difficulty	ND	0.0%	5.6%	14.3%	36.3%	7.5%
Self-Care Difficulty	ND	0.0%	2.3%	4.8%	24.9%	3.7%
Independent Living Difficulty	ND	ND	4.8%	3.6%	42.9%	7.6%

SOURCE: American Community Survey, 2019 1-Year Estimates

The percent of the population with disabilities increases as the population ages. For persons age 75 and older, 53.7 percent have at least one difficulty or disability. As seniors age, the frequency of ambulatory, self-care and independent living disabilities increases greatly. This is especially important for housing as seniors may need small modifications or potentially costly renovations to their houses in order to maintain living independently in their homes.

The following table shows households with a disabled household member by tenure and income range. The most common disabilities were ambulatory and vision or hearing impairment. In the lowest income category (0-30% AMI), there were a higher number of households with a member who have ambulatory, cognitive, or self-care or independent living limitations. Renters are more likely to have a disabled member than homeowners in Las Cruces, except in higher median income households (80% or higher AMI).

Table 11: HUD CHAS Disability Status by Tenure and Income Range, Las Cruces, 2013-

	Total	0-30% AMI	31-50% AMI	51-80% AMI	> 80% AMI
All Households					
Household member has a cognitive limitation	4,055	845	655	755	1,800
Household member has a hearing or vision impairment	5,120	540	675	850	3,055
Household member has a self-care or independent living limitation	4,680	815	780	890	2,195
Household member has an ambulatory limitation	6,135	970	775	1,165	3,225
Renters					
Household member has a cognitive limitation	2,250	640	435	460	715
Household member has a hearing or vision impairment	2,025	415	365	465	780
Household member has a self-care or independent living limitation	2,345	635	490	440	780
Household member has an ambulatory limitation	2,610	750	485	585	790

Owners					
Household member has a hearing or vision impairment	1,805	205	220	295	1,085
Household member has an ambulatory limitation	3,095	125	310	385	2,275
Household member has a cognitive limitation	2,335	180	290	450	1,415
Household member has a self-care or independent living limitation	3,525	220	290	580	2,435

Source: HUD CHAS Data 2013-2017

The City of Cruces total population increased by 37.7 percent from 2000 to 2013 according to the 2015 New Mexico Annual Social and Economic Indicators report[1]. During the same time period, the total population of Dona Ana County increased 22.2 percent and t is projected to grow 31.8 percent from 2015 to 2040. As the Baby Boomer generation continues to age, they will have unique housing and health care needs. Many seniors are opting to age in place in their homes and may be reluctant to accept government assistance. Accessibility modifications and in-home assistance will become increasingly important for this growing segment of the population.

[1] https://www.jobs.state.nm.us/admin/gsipub/htmlarea/uploads/ASEI_2015.pdf

HOUSEHOLDS

As the total population in the city of Las Cruces has grown over the past 10 years, so has the total number of households. Las Cruces did not experience the full effects of the 2008 housing crisis and has continued to grow steadily since 2000. While the growth rate has begun to slow in recent years, the city is still experiencing some growth. Dona Ana County has experienced a higher growth rate than the city since 2010, which is likely due to the new developments being built on the outskirts of city limits.

Table 12: Total Households, Las Cruces, 2010 – 2019

	Dona Ana County	Las Cruces
2010	75,532	39,433
2019	79,094	40,185
Percent Change	+4.7%	+1.9%

Source: American Community Survey, 2010, 2019 1-Year Estimates

Table 13 shows these types and estimates the total number and percent of all households by type in 2017. Over half of all households in Las Cruces are small family households, defined as those with two to four family members. Households with at least one person age 62 – 74 years of age made up 20.4 percent of Las Cruces households in 2017. Approximately one in five households in Las Cruces have one or more children six years old or younger.

Table 13: Household Type, Las Cruces, 2017

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	5,900	4,370	6,615	3,245	19,680
Small Family Households *	1,980	1,720	2,950	1,520	13,150
Large Family Households *	360	400	490	300	1,370
Household contains at least one person 62-74 years of age	660	795	1,135	420	5,105
Household contains at least one person age 75 or older	355	620	790	345	2,435
Households with one or more children 6 years old or younger *	1,095	850	1,255	535	2,960

Source: 2013-2017 CHAS

* indicates that the highest income category for these family types is >80% HAMFI.

HOUSEHOLD INCOMES

In Las Cruces, 22.7 percent of households earn less than $25,000 a year, which is equivalent to 55 percent AMI in Las Cruces). The household median income for the city of Las Cruces is $45,130. As shown in Table 14, approximately 60 percent of households earn more than the median household income.

Table 14: Households by Tenure and Income, Las Cruces, 2019

	Renter Households	Owner Households	Total Households
Less than $10,000	20.5%	3.9%	11.6%
$10,000 - $14,999	8.7%	3.6%	6.0%
$15,000 - $24,999	9.2%	1.5%	5.1%
$25,000 - $34,999	17.2%	2.9%	9.6%
$35,000 - $49,999	7.1%	10.1%	8.7%
$50,000 - $74,999	8.5%	15.8%	12.4%
$75,000 - $99,999	16.3%	20.1%	18.3%
$100,000 - $149,999	7.2%	18.4%	13.2%
$150,000+	5.1%	23.8%	15.1%
Median Income	$22,185	$66,682	$45,130

Source: American Community Survey, 2019 1-Year Estimates

While over two-thirds of total households in Las Cruces earns more than the median household income, there is a disproportionate number of renters who earn less than the median income. Approximately one in five renter households earn less than $10,000 annually. The median household income for owners is three times that of renters in Las Cruces.

Table 15 estimates the number of households in Las Cruces by tenure (renter vs. owner) and by percent of HUD's area median income (AMI) in 2019. AMI is important to understand as individuals receiving funding or services under HUD's CDBG or HOME grants must meet certain requirements, such as median household income. Programs and services are generally allocated to households and individuals earning less than 80% of a city's AMI. Half of renter households in Las Cruces have incomes at 50% of the AMI or less, while 66% of owner households have incomes at 80% of the AMI or above.

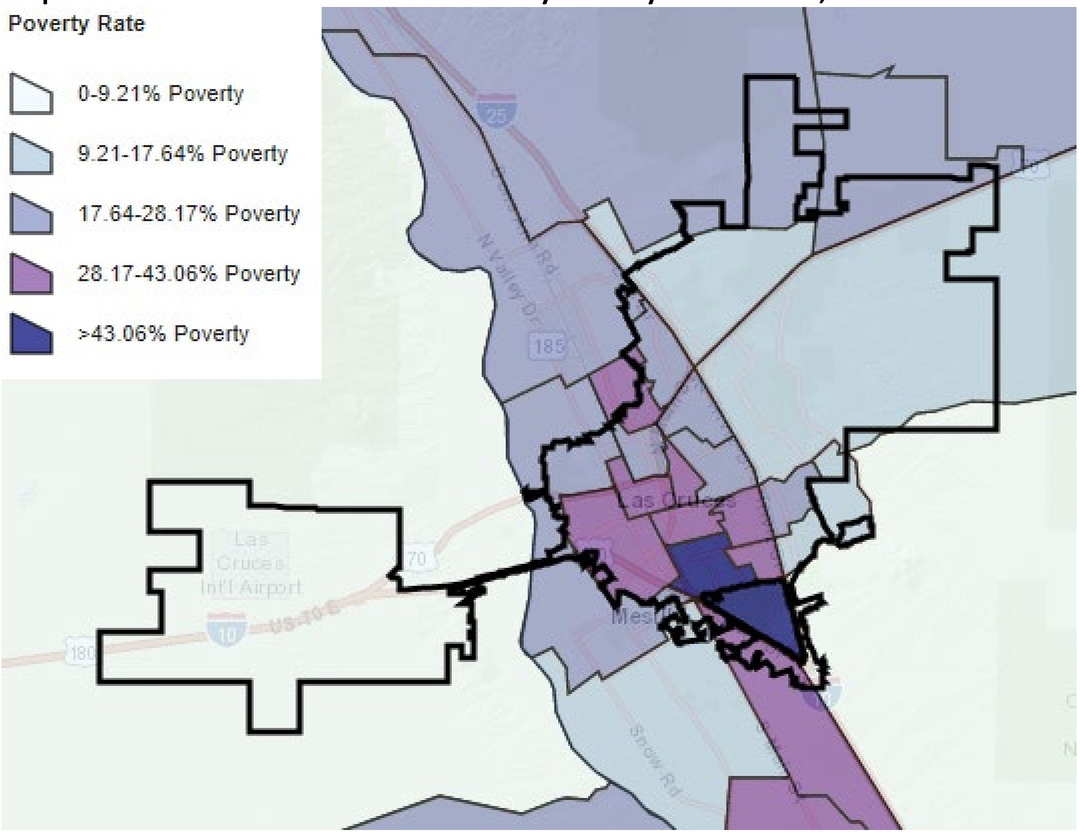
Table 15: Households by Income Range and Tenure, 2019

	Renter Households		Owner Households		Total Households	
	Number	**Percentage**	**Number**	**Percentage**	**Number**	**Percentage**
0 – 30% AMI	4,411	20.5%	729	3.9%	4,661	11.6%
31-50% AMI	3,851	17.9%	952	5.1%	4,460	11.1%
51-80% AMI	3,701	17.2%	541	2.9%	3,858	9.6%
81-100% AMI	1,528	7.1%	1,886	10.1%	3,496	8.7%
101-120% AMI	1,829	8.5%	2,931	15.7%	4,983	12.4%
120% AMI and over	6,196	28.8%	11,631	62.3%	18,727	46.6%
Total	21,515		18,670		40,185	

Source: 2013-2017 CHAS

Map 3, below, shows the percentage of households in each of Las Cruces' census tracts, with incomes below 80% AMI. The highest concentrations of households with low incomes are in central Las Cruces.

Map 3: Percent of Households Below Poverty Level by Census Tract, 2019



SOURCE: CPD Maps

Approximately one in six families have lived below the poverty line in the past 12 months. The disparities are great between renters and owners in both Las Cruces and Dona Ana County. Over one quarter of all renters in Las Cruces live in poverty, which is slightly lower than the percentage of families living in poverty in Dona Ana County.

Table 16: Family Poverty Level by Tenure, Las Cruces, 2019

	Las Cruces		Dona Ana County	
	Number	**Percentage**	**Number**	**Percentage**
Families with income in the past 12 months below poverty level	3,261	14.2%	9,869	19.4%
Families in poverty, owner occupants	1,306	8.4%	5443	14.7%
Families in poverty, renter occupants	1,958	26.4%	4458	32.2%

Source: American Community Survey, 2019 1-Year Estimates

The following table provides information about persons in poverty living in Las Cruces from 2010–2019. The number of persons in poverty has grown during this time period, from a total of 18,175 in 2010 to 24,474 in 2019, according to the US Census Bureau American Community Survey. The total poverty rate, or percent of persons in poverty, has increased from 21.3 percent of the total population to 22.2 percent. The poverty rate for children in Las Cruces has increased from 27.2 percent to 33.4 percent from 2010 to 2019.

Research shows that single female parents are more vulnerable to low income and poverty status in the United States.[2] The poverty rate for single female parents in poverty has stayed relatively the same between 2010 and 2019.

Table 17: Poverty in Las Cruces, 2010-2019

	2010	2019
Persons in Poverty	18,175	24,474
Poverty Rate	21.3%	22.2%
Children in Poverty	6,184	7,783
Poverty Rate	27.2%	33.4%
Over 65 in Poverty	877	1,275
Poverty Rate	7.30%	8.4%
Single Female Parents in Poverty	6,816	8,605
Poverty Rate	40.4%	40.0%

Source: American Community Survey 2010, 2019 1-Year Estimates

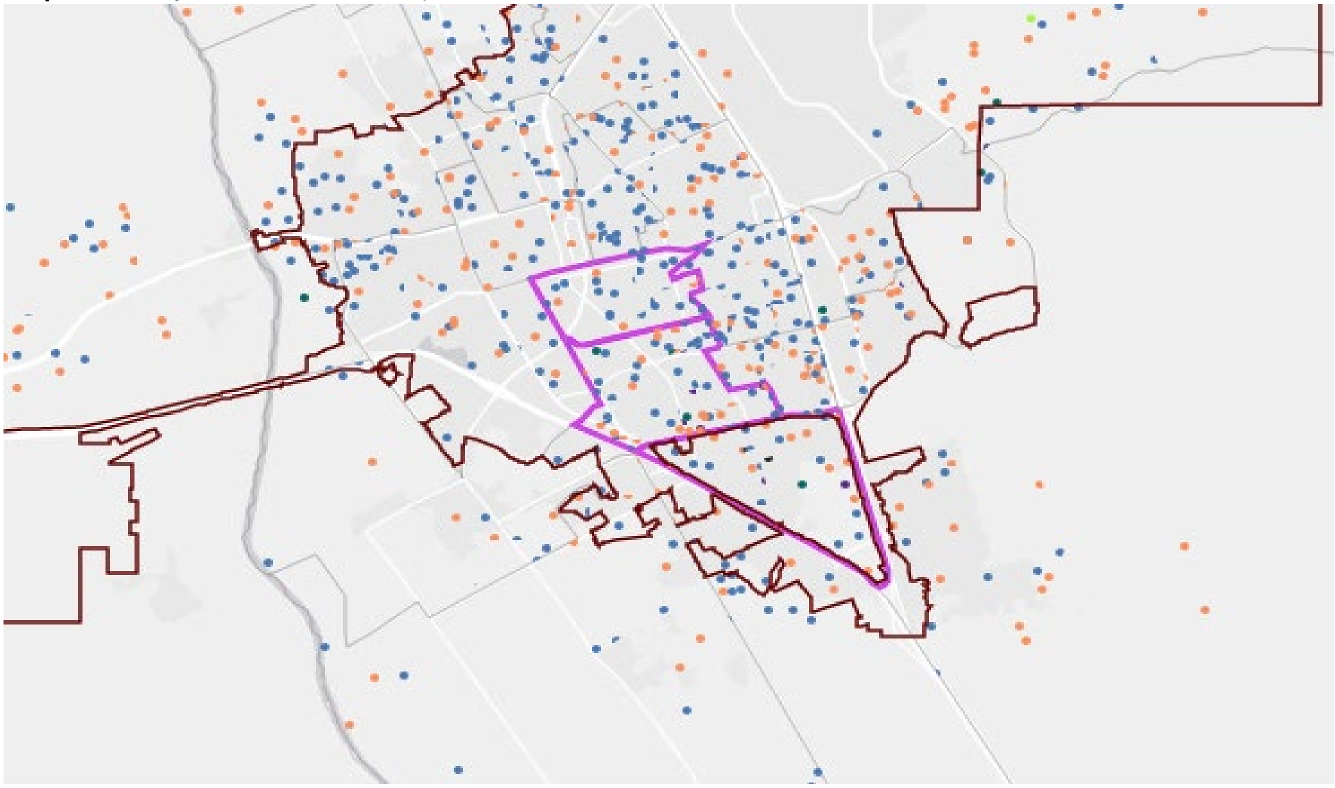
Persons in poverty are more likely to need affordable housing solutions and other services, such as public transportation, subsidized childcare, medical and food assistance. A rising number of persons in poverty means greater demand for housing and services.

HUD R/ECAP CENSUS TRACTS

While many census tracts have more than 50% Hispanic population, there are just four that meet the R/ECAP threshold of 50% non-white and having a poverty rate of 40% or more, or three times or more the average tract poverty rate for the Las Cruces MSA. HUD has developed a data and mapping tool that identifies these “R/ECAP” census tracts based on 2010 census data. In Las Cruces, there are two R/ECAP tracts –6.00 and 9.00. Tract 10.00, shown in the map below, is owned solely by New Mexico State University and is not within the City limits.

[2] Inequalities in Poverty and Income between Single Mothers and Fathers. Int J Environ Res Public Health 2020 Jan; 17(1): 135. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6982282/

Map 4: HUD R/ECAP Census Tracts, Las Cruces 2019



HUD AFFHT Mapping System R/ECAP Census Tract Map

According to the HUD AFFHT data system, 77 percent of households in these tracts were Hispanic in 2019, and the median household size was 2.5 persons. Tracts 6.00 and 9.00 are near downtown, and in older Las Cruces neighborhoods. The American Community Survey data shows that in tract 6.00, 77.1 percent are Hispanic/Latino, and in tract 9.00, 76.9 percent are Hispanic/Latino.

ECONOMY AND LOCAL EMPLOYMENT

The Las Cruces MSA's labor force has changed drastically in the past year due to the COVID-19 pandemic. In 2019, the average unemployment rate was 3.5 percent. However, due to the pandemic and many localities implementing strict shelter in place orders across the country to help curb the spread of the virus, the national unemployment rate increased to all-time highs. In Las Cruces, the unemployment rate peaked at 13.0 percent in July 2020[3]. The unemployment rate has since declined, and the November 2020 unemployment rate was 7.1 percent.

Table 18: Labor Force in Las Cruces, 2019

Total Population in the Civilian Labor Force	48,764
Civilian Employed Population 16 years and over	45,826
Unemployment Rate	3.5%
Unemployment Rate for Ages 16-24	17.9%
Unemployment Rate for Ages 25-65	6.7%

Source: 2019 American Community Survey 1-Year Estimates

The largest number of employed workers in Las Cruces are in the education and health care services, retail trade, and professional, scientific, and management services. Many of these jobs are relatively "safe" during economic downturns with the exception of some retail jobs. During the COVID-19 pandemic, some retail workers, such as grocery store or gas station employees, were considered essential while others were not.

[3] U.S. Bureau of Labor Statistics. Las Cruces, New Mexico. https://www.bls.gov/eag/eag.nm_lascruces_msa.htm

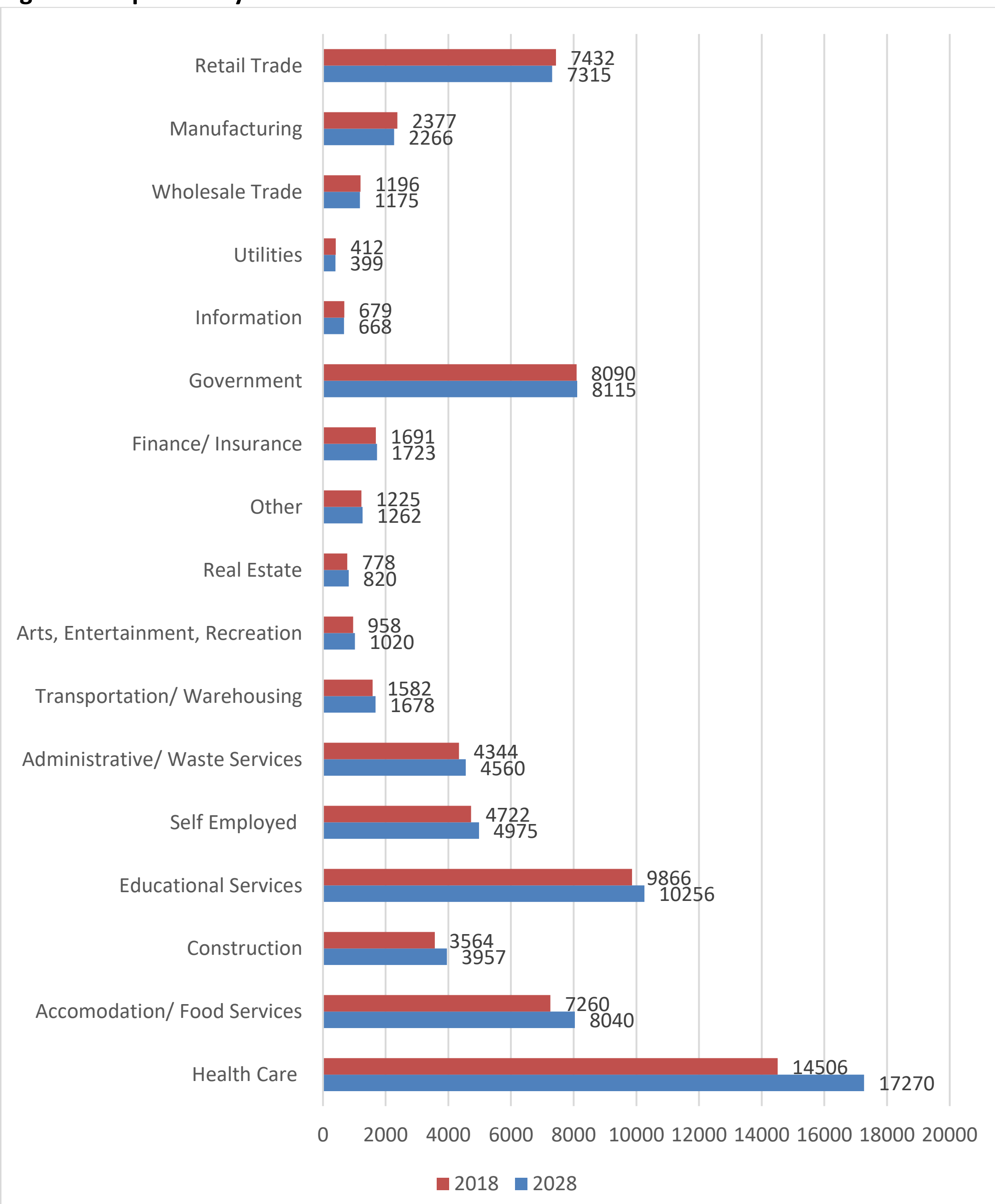
Table 19: Occupations by Sector in Las Cruces, 2019

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs less workers
			%	%	%
Agriculture, Mining, Oil & Gas Extraction	1,041	2,868	2.20%	4.90%	-2.70%
Arts, Entertainment, Accommodations	3,199	1,089	6.80%	1.90%	4.90%
Construction	3,443	4,046	7.30%	6.90%	0.40%
Education and Health Care Services	16,345	25,605	34.70%	43.80%	-9.10%
Finance, Insurance, and Real Estate	1,411	1,910	3.00%	3.30%	-0.30%
Information	320	456	0.70%	0.80%	-0.10%
Manufacturing	1,605	2,897	3.40%	5.00%	-1.60%
Other Services	2,193	1,240	4.70%	2.10%	2.50%
Professional, Scientific, Management Services	5,577	3,872	11.80%	6.60%	5.20%
Public Administration	3,614	2,930	7.70%	5.00%	2.70%
Retail Trade	6,331	7,913	13.40%	13.50%	-0.10%
Transportation and Warehousing	1,643	2,198	3.50%	3.80%	-0.30%
Wholesale Trade	387	1,411	0.80%	2.40%	-1.60%
Total	**47,109**	**58,435**	**--**	**--**	**--**

Source: 2019 American Community Survey 1-Year Estimates; Longitudinal Employer-Household Dynamics (Jobs)

The figure below shows the projected industry employment growth in the Las Cruces MSA from 2018 – 2028. Health care is projected to grow rapidly over the next 10 years likely due to the aging Baby Boomer population who will require more health care services and providers. The second highest growth rate industry is accommodation/food services followed closely by construction and educational services. As the population continues to grow in Las Cruces, more houses and educators will be needed. Industries likely to decline over the next 10 years include retail trade and manufacturing. Elevate Las Cruces comprehensive plan provides strategies to help economic and job growth in Las Cruces through 2045.

Figure 1: Top Industry Growth in Las Cruces



SOURCE: New Mexico Department of Workforce Solutions, 2019. https://www.dws.state.nm.us/Researchers/Data/Occupations-Wages

Table 20: Occupational Wages

Sector	Entry Salary	Average Salary	Experienced Salary
Business and Financial Operations	$36,060	$60,880	$73,290
Management	$47,150	$89,510	$110,700
Computer and Mathematics	$34,400	$68,460	$85,490
Architecture and Engineering	$48,950	$79,620	$94,950
Life, Physical, and Social Science	$40,660	$69,710	$84,240
Community and Social Service	$28,820	$47,900	$57,450
Legal	$35,490	$76,630	$97,200
Education, Training, and Library	$21,220	$52,390	$67,970
Arts, Design, Entertainment	$30,800	$53,430	$64,740
Healthcare Practitioners and Technical	$39,560	$82,770	$104,380
Healthcare Support	$18,160	$24,240	$27,290
Protective Service	$25,470	$49,140	$60,970
Food Preparation	$17,910	$22,460	$24,740
Building and Grounds	$18,430	$24,420	$27,410
Personal Care and Service	$18,190	$29,660	$35,400
Sales	$19,980	$30,800	$36,210
Office and Administrative Support	$21,230	$32,320	$37,870
Farming, Fishing and Forestry Occupations	$17,800	$23,250	$25,970
Construction and Extraction	$25,610	$39,210	$46,000
Installation, Maintenance, and Repair	$24,110	$40,990	$49,420
Production Occupations	$21,020	$35,150	$42,210
Transportation and Material Moving Occupations	$21,130	$30,080	$34,550

SOURCE: New Mexico Department of Workforce Solutions, 2019.
https://www.dws.state.nm.us/Researchers/Data/Occupations-Wages

The median household income in Las Cruces is $45,130. As Table 20 shows, salaries vary widely based on industry sector and experience level. The highest paying jobs are typically found in management, architecture and engineering, health care practitioners and technical, and legal. Very few entry salaries are above the median household income in Las Cruces meaning that young adults just entering the workforce after college may struggle financially, especially if they have high student loan debts.

HOUSING MARKET PROFILE

MARKET OVERVIEW

The Las Cruces housing market has been hot in the recent years, especially in 2020 when supply reached a record setting low due to the COVID-19 pandemic and high demand. Realtors, home builders, and developers discussed the rising costs of affordable housing for sale within the City during stakeholder interviews and community focus group meetings. The median sale price for a housing in 2020 was $200,000 whereas the median sale price was $183,000 in 2019. For the household earning the median income of $45,130, $200,000 is unaffordable. For those earning even less, the dreams of homeownership are limited.

Approximately one third of all housing units in Las Cruces were constructed prior to 1980, and deferred maintenance and disrepair are an issue for some of the aging housing stock. A Home Rehabilitation Program for low and moderate income owners is offered by the City of Las Cruces and is important for ensuring that the existing housing stock is maintained. Older rental housing properties in some areas of Las Cruces are in need of upgrades and repairs to ensure the health and safety of tenants.

The most significant HUD “housing condition” experienced in Las Cruces is cost burden, the result of a lack of affordable units. HUD CHAS data shows that approximately 40 percent of renters in 0-30% AMI are cost burden and 60 percent are severely cost burden. The number of severely cost burden renters is approximately 2.8 times higher than owners.

The Housing Gap Analysis reveals a gap in rental units for households with very low income. The number of households that can afford a rental unit with a rent of $1 to $499 is over twice that of the supply of rental units in that rent range in Las Cruces. While the ownership housing gap analysis shows a surplus of houses available that is affordable to low income earners, local realtors say those houses need significant investments to make them livable.

Table 21: Tenure by Units in Structure, 2019

	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
1-unit Detached	18,334	85.2%	6,101	35.6%	24,435	60.8%
1-unit Attached	1,062	4.9%	814	4.3%	1,876	4.7%
2 to 4 Units	265	1.2%	3,092	16.5%	3,357	8.4%
5 to 19 Units	106	0.4%	5,235	28.0%	5,341	13.3%
20 or More Units	94	0.4%	2,076	11.1%	2,170	5.4%
Other (mobile home, RV, etc.)	1,654	7.6%	1,352	7.2%	3,006	7.5%
Total	**21,515**		**18,670**		**40,185**	

Source: American Community Survey, 2019 1-Year Estimates

Over 85 percent of homeowners in Las Cruces own a single family detached house whereas over one half of renters live in a multifamily unit. Approximately one in three renters live in a single family house.

Table 22: Year Units Built by Tenure, 2019

	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
Built 2000 or later	8,317	38.7%	4,419	23.7%	13,686	30.2%
Built 1980-1999	6,187	28.8%	7,103	38.0%	15,430	34.1%
Built 1950-1979	5,441	25.3%	6,421	34.4%	13,624	30.1%
Built 1949 or earlier	1,570	7.3%	727	3.9%	2,509	5.5%
Total	**18,670**	**53.5%**	**21,515**	**46.4%**	**45,249**	
Median Year Built	1989		1983		1978	

Source: American Community Survey, 2019 1-Year Estimates

Compared to other regions of the United States, the current housing stock in Las Cruces is relatively new. Approximately one-third of tenures in the city were built between 2000 and 2019. Only 5.5 percent of houses in Las Cruces were built before 1949. Older houses often require more upkeep and may contain lead-based paint or asbestos, which can be hazardous to a person's health.

Table 23: Unit Size by Tenure[4]

	Owner occupied:		Renter occupied:	
	Number	%	Number %	
No bedroom	34	0.20%	749	4.00%
1 bedroom	231	1.10%	3,817	20.40%
2 bedrooms	2,421	11.30%	8,051	43.10%
3 or more bedrooms	18,829	87.50%	6,053	32.40%
Total	21,515		18,670	

Source: American Community Survey, 2019 1-Year Estimates

[4] The total number of tenures varies slightly.

Most housing units in Las Cruces have three or more bedrooms. However, renters are more likely to live in smaller units, while most units with three or more bedrooms are owner occupied. A lack of larger rental units can be a challenge to larger families trying to find a rental housing unit.

RENT PROFILE

The New Mexico Apartment Association and BBER at the University of New Mexico both track the rental market in Las Cruces, and provide more accurate data on vacancy rate, square footage, and market rate compared to the U.S. Census Bureau.

The average rent for all units in Las Cruces in Fall 2017 was $707 and ranged from $594 for a one bedroom one bath unit to $1,450 for a three bedroom 2.5 bath unit.

Table 24: New Mexico Apartment Association Rent and Vacancy Survey, Fall 2017

	Total Units Responded to Survey	Vacant Units	Percent Occupied	Average SF	Average Base Mkt Rent	Average Base Rent/SF
All Units	2,665	94	96.5%	870	$707	$0.81
EFF	8	0	100.0%	706	$750	$1.06
1 BR/1B	867	34	96.1%	693	$594	$0.93
2 BR/1B	692	15	97.8%	805	$636	$0.79
2 BR/1.5B	64	2	96.9%	940	$694	$0.74
2 BR/2B	540	25	95.4%	1,042	$863	$0.83
2 BR/2.5B	6	1	83.3%	1,517	$1,450	$0.96
3BR/1BA	48	0	100.0%	1,500	$680	$0.45
3 BR/2B	434	16	96.3%	1,121	$836	$0.75
3 BR/2.5 B	6	1	83.3%	1,677	$1,358	$0.81

Source: New Mexico Apartment Association, 2017

Unsurprisingly, the highest vacancy rates occur in the higher priced units. Housing providers and landlords interviewed during this study indicate a tight market, with long waiting lists and few vacancies in price restricted and lower rent units. Very low vacancy rates in lower priced units may indicate the need for more affordable units.

Community stakeholder interviews with the Mesilla Valley Public Housing Authority, Community of Hope, Tierra Del Sol, private landlords, and community residents indicate that there is a significant need for affordable housing options. Wait lists for housing vouchers can be up to two years and many private landlords in Las Cruces do not accept housing vouchers.

Table 25 includes public housing units, Section 8 financed units, LIHTC units and other price restricted units owned by the Mesilla Valley Public Housing Authority, Tierra del Sol, other nonprofits and private ownership interests. Of the 1,547 units in Las Cruces, 95.8 percent (1,482 units) are price restricted units. Most units have income restrictions at 50% or 60% AMI.

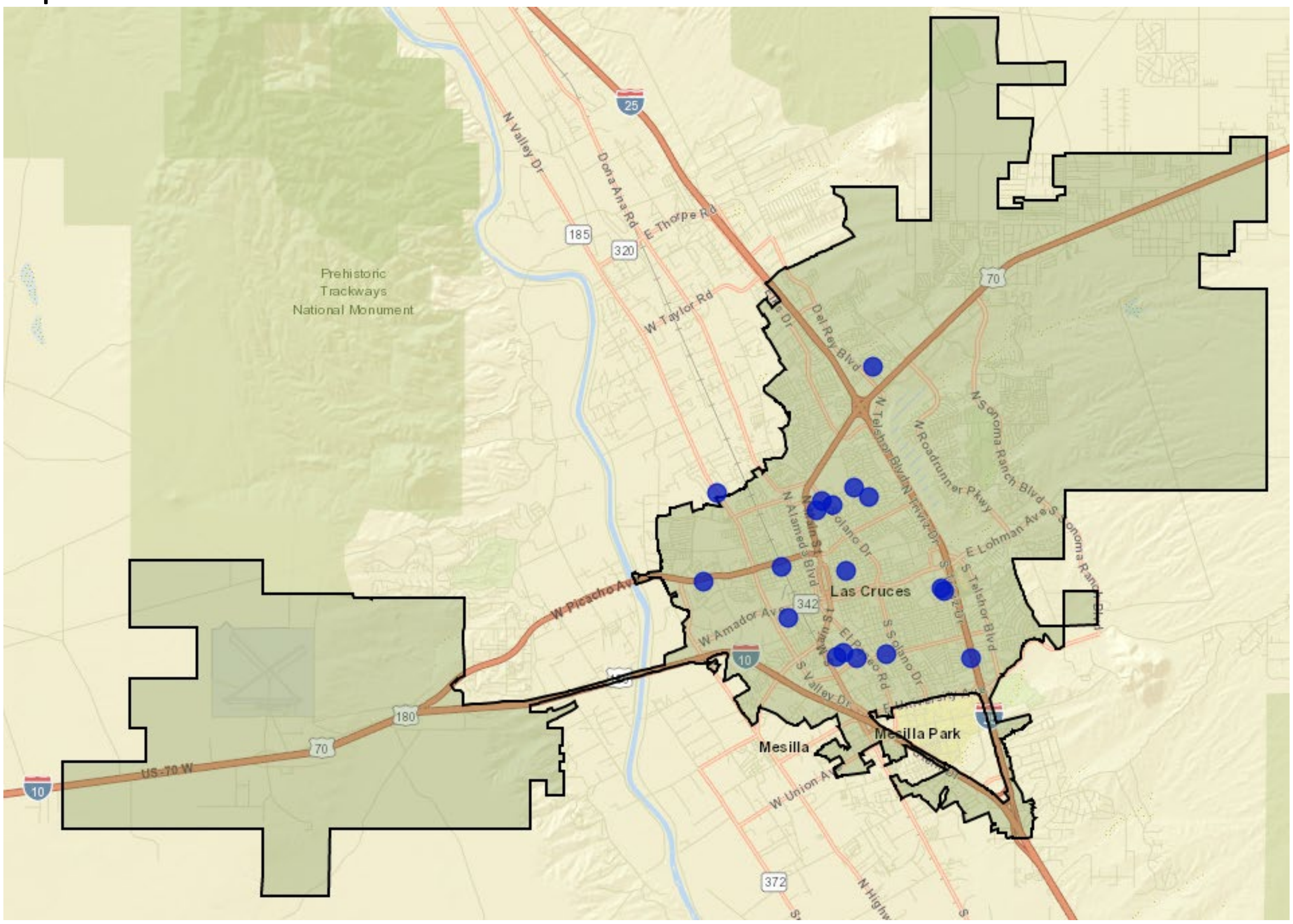
Table 25: Price Restricted Rental Units in Las Cruces, 2019

Property Name	Total Units	Price Restricted
Doña Ana Park Apartments	132	132
Highland Park Apartments	50	50
Montana Meadows Apartments	80	80
Desert Palms	100	100
Four Hills Apartments	72	60
Mesquite Village	48	48
Stone Mountain Place	84	72
Vista Montana	80	79
Casa de Corazones	15	14
Chaparral Senior Apartments	40	40
Mira Vista Senior Village	76	60
Montana Senior Village	49	48
St. Genevieve Village	42	41
Los Altos Apartments	72	60
Alta Tierra	56	56
Burley Court Apartments	40	40
Robledo Ridge Apartments	70	61
El Crucero	12	12
Cactus Gardens (Duplex)	2	2
Cactus Gardens (Duplex)	2	2
Alta Tierra	57	57
La Casa - NSP Rental Housing	5	5
MVCH - NSP Sue's House	1	1
Abode	15	15
Oak Street	20	20
Tres Arboles	64	64
San Pedro Place	38	38
Walnut Grove	100	100
Jardines Alegres	47	47
Jardines Verdes	40	40
Almedra Apartments	18	18
Pecos Apartments	20	20
Total	**1,547**	**1,482**

Source: City of Las Cruces, Mesilla Valley Housing Authority, Tierra del Sol, 2019

Rental units are located for the most part in central neighborhoods of Las Cruces, which is also where many community services are located, and the best access to the local public transportation system.

Maps 5: Locations of Price Restricted Rental Units



Source: City of Las Cruces, ESRI

HUD AFFHT shows that a low dissimilarity index that is in the Low Segregation index level in Las Cruces, indicating that segregation is not a concerning issue. The same data AFFHT source shows that 15% of all price restricted rental units, and 25% of all rental assistance opportunities (price restricted rentals and vouchers) are located in Re/CAP tracts.

Table 22 shows the 2019 HUD HOME and Fair Market Rent limits for the Las Cruces MSA. Owners of affordable properties must meet these rent guidelines, and Section 8 voucher holders must find units at or below the Fair Market Rents, which is becoming a challenge, according to the local housing authority and non-profit housing providers. Fair Market Rent has increased approximately 5 percent for FY2021[5].

[5] FY 2021 Fair Market Rent Documentation System.
https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2021_code/2021summary.odn

Table 26: Monthly Rent, 2019

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	506	574	700	1,012	1,211
High HOME Rent	506	574	700	914	1,000
Low HOME Rent	470	503	605	698	778

Source: HUD FMR and HOME Rents, 2019.

Table 27 shows housing costs for the most common jobs in Las Cruces and household size. A retiree on a fixed income of social security can only afford rent up to $456 a month while a married couple with no children can afford up to $1,448 a month in rent.

Table 27: Housing Costs by Most Common Jobs in Las Cruces, 2019

	Retiree on Fixed Income **	Office and Administrative Support Occupations	Educational Instruction and Library Occupations	Single Parent with a Child(ren)	Family of Four People	Married Couple with No Children
Number of Persons in Household	1	1	1	2	4	2
Estimated Household Income	$18,264	$32,320	$52,390	$32,012	$60,808	$57,900
% of Area Median Income	42%	75%	122%	74%	141%	135%
Max Rent They Can Afford	$457	$808	$1,310	$800	$1,520	$1,448
Max Home Price	$52,966	$93,728	$151,931	$92,833	$176,343	$167,910
Area Median Income	$43,022					
** Based on average monthly Social Security benefits paid to Retired Workers (October 2020)						
Max Home Price Multiplier	2.9	2.9	2.9	2.9	2.9	2.9
Source: U.S. Department of Housing and Urban Development (2019)						

Sources: US Census Bureau.[6]

[6] Available at https://www.census.gov/quickfacts/fact/table/lascrucescitynewmexico/RHI125219; ACS. Available at https://data.census.gov/cedsci/table?q=S19&g=1600000US3539380&d=ACS%201-Year%20Estimates%20Subject%20Tables&tid=ACSST1Y2019.S1903&moe=false&hidePreview=true; Social Security Administration. Available at https://www.ssa.gov/policy/docs/quickfacts/stat_snapshot/2020-10.html

HOMEOWNERSHIP PROFILE

The real estate market in 2020 was an unusual year. For many regions across the country, the existing housing stock was limited due to many people reluctant to sell their homes during a global pandemic. With higher demand than supply, this led to a sharp increase in prices. The rapid increase in sale prices and intense buyer competition negatively impacted low-income and first-type homebuyers who may be limited by a low downpayment and more restricted loan options, such as FHA or VA loans.

From January 2020 through November 2020, 2,186 homes[7] were sold in Las Cruces, an increase of 4.8 percent from 2019. The median sale price was $200,000 whereas in 2019, the median sale price from $183,600.

Table 28: Houses Sold in Las Cruces, Year-to-Date 2020 and 2019

Price	YTD 2020	YTD 2019	Percent Change
$0 - 29,999	7	2	250%
$30,000 - 39,999	5	13	-61.5%
$40,000 - 49,999	11	13	-15.4
$50,000 – 59,999	11	24	-54.2%
$60,000 – 69,999	17	23	-26.1%
$70,000 – 79,999	22	23	-4.3%
$80,000 – 89,999	33	39	-15.4%
$90,000 – 99,999	30	46	-34.8%
$100,000 – 119,999	61	119	-48.7%
$120,000 – 139,999	156	206	-24.3%
$140,000 – 159,999	183	233	-21.5%
$160,000 – 179,999	297	252	17.9%
$180,000 – 199,999	249	225	10.7%
$200,000 – 249,999	410	362	13.3%
$250,000 – 299,999	252	212	18.9%
$300,000 – 399,999	270	187	44.4%
$400,000 – 499,999	92	71	29.6%
$500,000+	80	36	122.2%
Total	2,186	2,086	4.8%

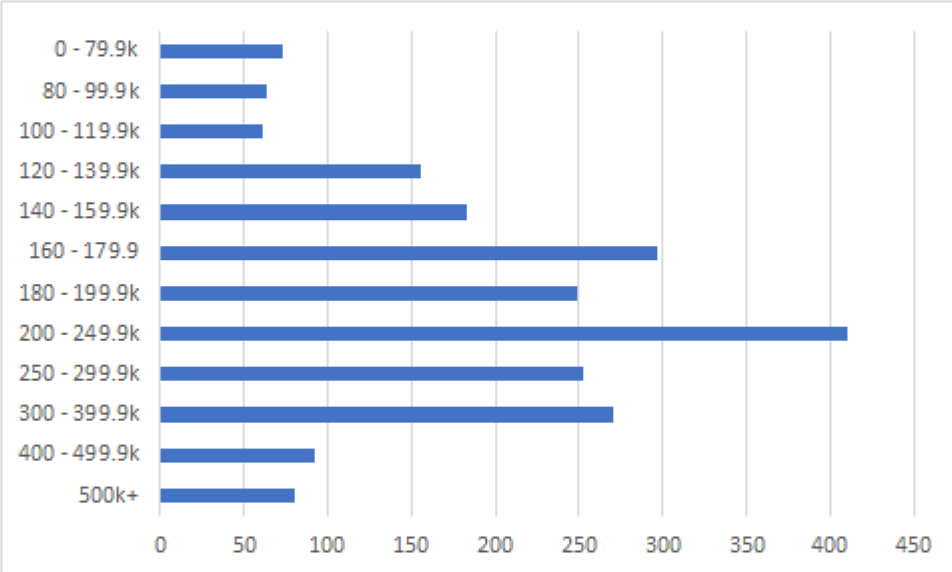
Source: 2020 MLS

Most homes sold in 2020 were $160,000 to $399,999 price range. There was a 122.2 percent increase in the number of homes sold with a listing price of $500,000 or more indicating there is an increased demand for luxury homes in Las Cruces. As of January 2021, the housing market in Las Cruces has a severe shortage of houses for sale. Typically, there is approximately 3,000 listings, but there is currently between 1,200-1,400 listings and homes go under contract almost immediately[8]. The very limited supply of housing is driving up the median sale price. Additionally, many builders are not taking any new orders of homes as they are so busy.

[7] 2020 MLS data.

[8] Stakeholder interview with Realtor Kevin Wilson. January 19, 2021.

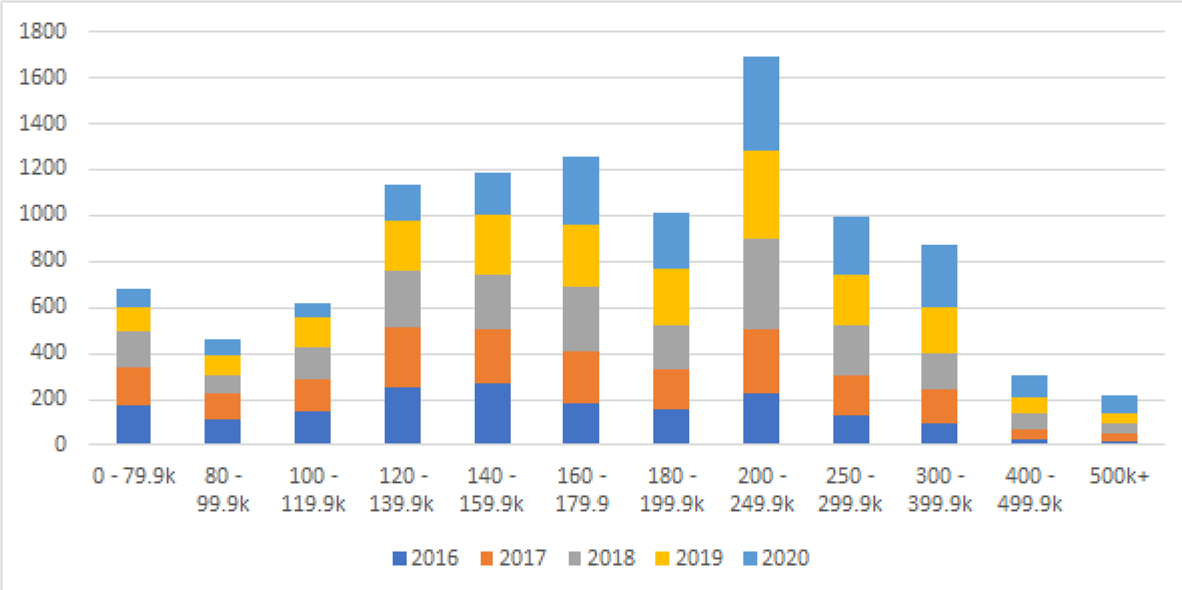
Figure 2: Sales Prices of Units Sold, YTD November 2020



Source: MLS

While approximately 50 percent of the units for sale in Las Cruces are still priced at $200,000, the percentage of these units in the overall inventory is on the decline. A household earning the median income of $45,130 in Las Cruces can only afford a house with a maximum price of $166,400 based on HUD's recommended 30 percent of income paid towards housing costs. There is an increased demand of higher end homes in Las Cruces indicating that affordable housing is either not in demand, not being sold, or not being built. Based on stakeholder interviews and community-wide focus groups, there is a need for affordable houses in Las Cruces. However, due to regulations, policy, and the costs of building materials, land, and labor, new affordable housing is difficult to build.

Figure 3: Sales by Price Range, 2015 – 2020, Las Cruces



Source: MLS

The median sale price in Las Cruces has increased 30.5 percent since 2015. The largest increases have occurred in the most recent years. The raising median sales price is largely due to the limited supply and high demand for housing in Las Cruces.

Table 29: Median Sale Price over Time in Las Cruces, 2015 – 2020

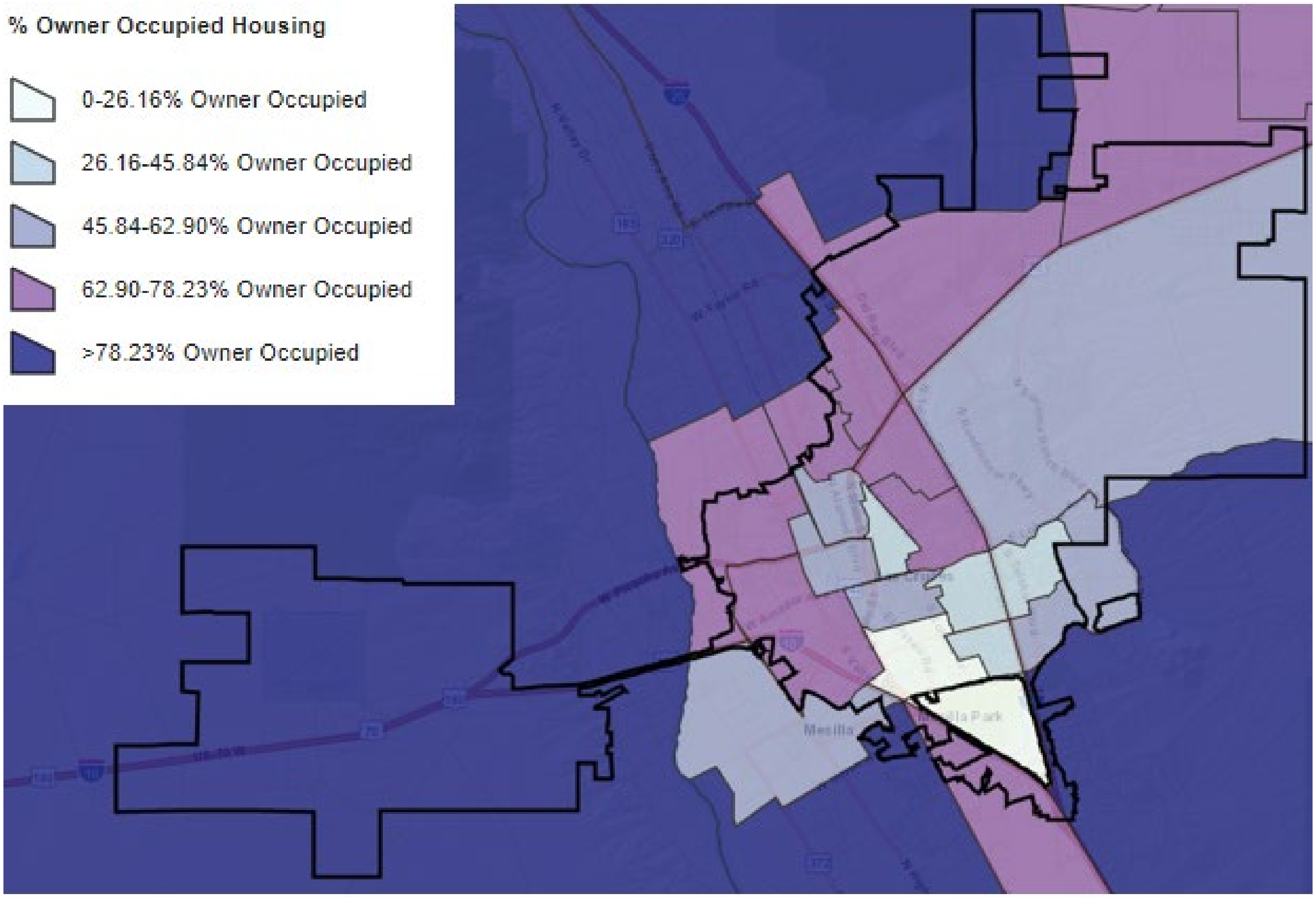
Year	Median Sale Price	Total Units Sold
2015	$153,250	1,576
2016	$155,500	1,787
2017	$165,100	1,980
2018	$176,000	2,204
2019	$183,145	2,260
2020	$200,000	2,186[9]

Source: MLS, 2016-2020

[9] November 2020 data.

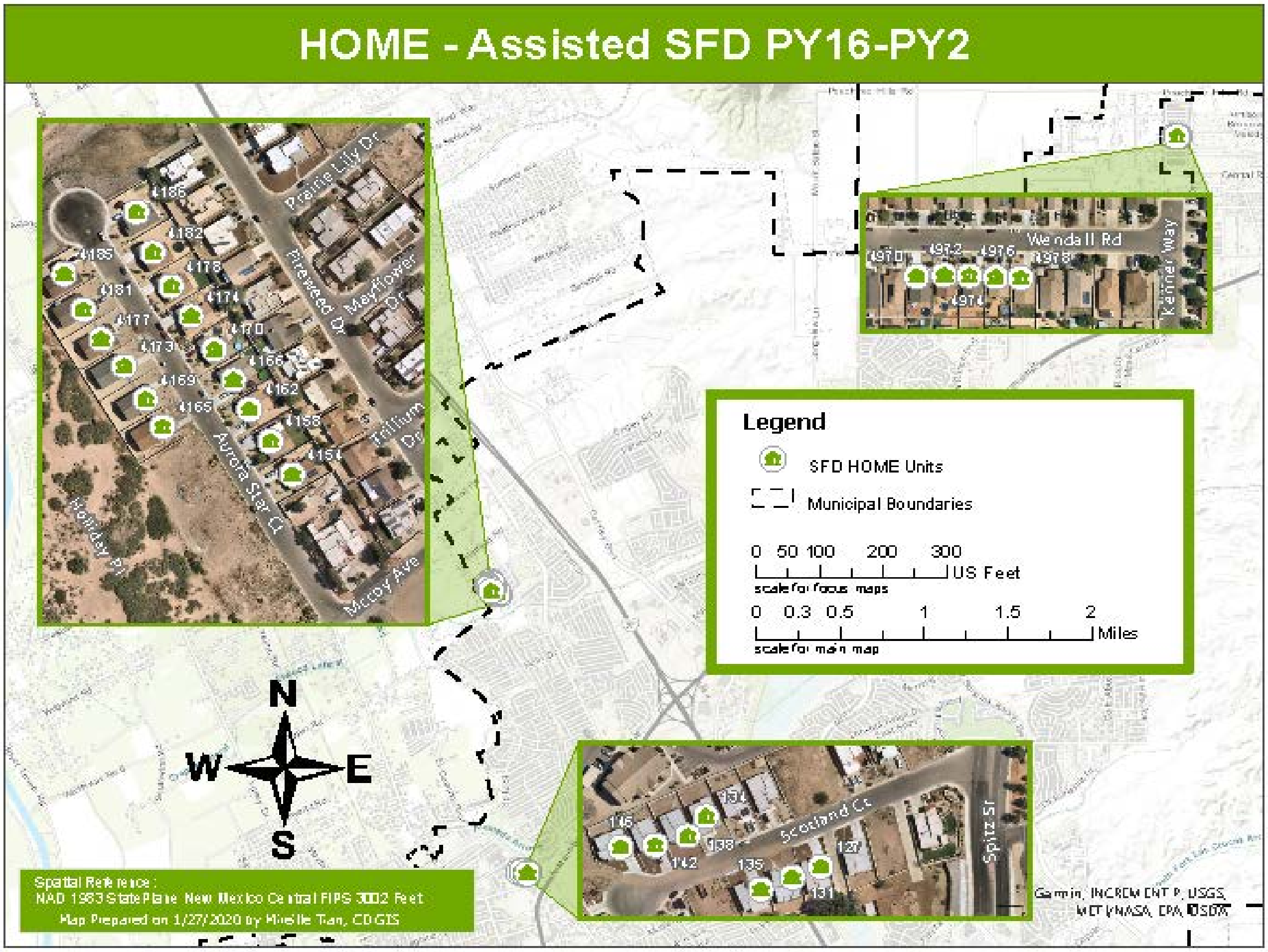
The highest concentrations of owners are in the newest areas of Las Cruces where large single family developments were built in the 1990s and early 2000s and are still being developed. Central neighborhoods have a higher concentration of renter-occupied households.

Maps 6: Homeownership Rates by Census Tract, 2019



Source: HUD CPD Maps

Map 7: Location of Homebuyer Assistance Units



Source: City of Las Cruces

Map 7 shows the location of each of the 27 households who received homebuyer assistance from the City of Las Cruces from 2016 through 2020 through its Habitat for Humanity Property Acquisition and Single Family Development project. The current developments are being built in Rincon Mesa, Aurora, and Highland subdivisions.

Table 30 shows that the total number of residential building permits has declined between 2010 and 2020 in Las Cruces. However, there is an increase in the number of building permits issued for new single family units since 2015. The number of building permits for multifamily units is less than 40 over the past 10 years.

Table 30: Building Permits Issued in Las Cruces, 2010-2020

Description	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Totals
New Single Family	560	430	396	381	289	362	413	470	511	584	739	3,301
New Townhouses	16	9	19	16	4	10	5	8	16	3	1	87
Mobile Homes	107	108	76	78	76	78	74	61	59	46	29	658
Duplexes	0	0	2	0	0	1	1	0	1	4	1	5
Triplexes	3	0	0	0	0	0	0	1	0	0	0	4
Fourplexes	0	1	0	0	0	1	0	1	0	0	0	3
Multi-Family (Comm)	2	1	6	4	1	2	1	4	2	1	0	24
Addition & Alteration	326	255	252	269	311	266	313	237	121	172	114	2,229
TOTALS	1,014	804	751	748	681	720	807	782	710	810	884	6,311

Source: Source: City of Las Cruces

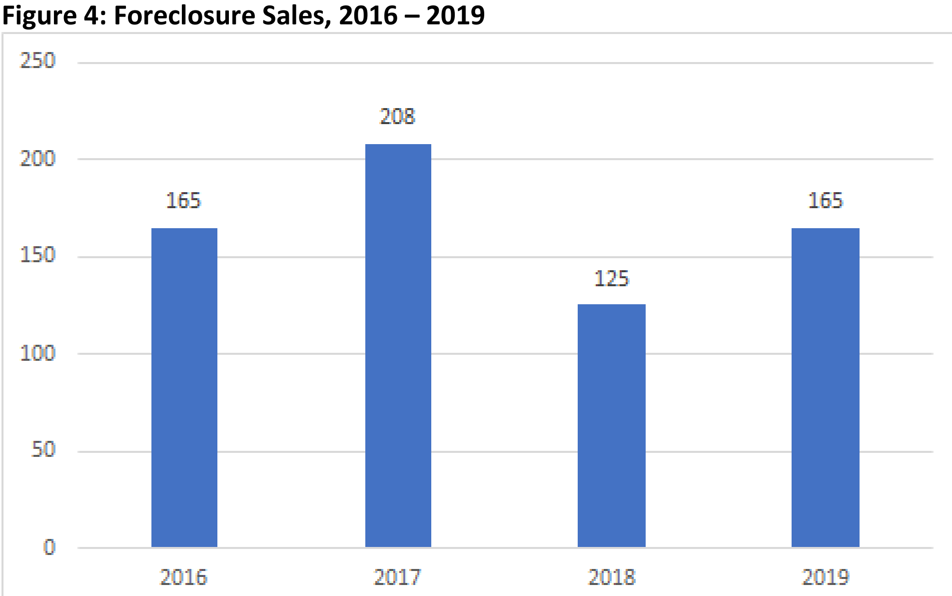
In previous years, Las Cruces has had a higher foreclosure rate than the national average. However, due to the COVID-19 pandemic, homeowners who are struggling to pay their mortgages may enter forbearance without the fear of foreclosure. These policies will likely last into 2021, but there is great uncertainty for future years.

Table 31: Foreclosure Ratios, 2020

	United States	New Mexico	Dona Ana County	Las Cruces
2020	1:360,660	1:91,86	1:21,555	1:16,6187

SOURCE: RealtyTrac

Figure 4: Foreclosure Sales, 2016 – 2019



Source: MLS Data

Low and moderate income households are especially vulnerable to foreclosure. Foreclosure counseling programs and refinancing options can help these homeowners stay in their unit and avoid foreclosure. While many vulnerable households are protected under the CARES ACT and other COVID-19-related federal policies, once forbearance and foreclosure protections are limited in the future, these households may lose their house if they are still catching up financially.

AFFORDABLE HOUSING NEEDS

There is an affordable housing crisis in the United States currently. HUD federal grants, such as CDBG and HOME funds are designated to help low to moderate income households with housing issues, such as home repairs and related services. In 2016, approximately 50 percent of all renters in the United States were considered cost burden[10]. In addition to cost burden, HUD defines housing problems as:

1. Housing unit lacks complete kitchen facilities.
2. Housing unit lacks complete plumbing facilities.
3. Overcrowding (1.01–1.5 persons per room).
4. Severe Overcrowding (greater than 1.5 persons per room).
5. Cost Burden (households paying between 30% and 50% of their income for housing).
6. Severe Cost Burden (household pays 50% or more of their income for housing).

HUD estimates there were 305 rental units and 135 owner occupied units without complete plumbing or kitchen facilities in 2017. Of the 305 renter-occupied units, 88.5 percent of the households had an income in the 30 – 80 percent AMI[11]. There were few severely overcrowded households in Las Cruces, though 500 renters and 115 owners were overcrowded in 2017.

By far the largest housing problem experienced by households in Las Cruces is cost burden and severe cost burden. Renters experience cost burden disproportionately more than homeowners, especially in the very low income AMI brackets. Approximately 40 percent of renters in 0-30% AMI are cost burden and 60% are severely cost burden.

Table 31: Cost Burden (> 30%) Households by Tenure

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,195	895	685	2,775	260	345	560	1,165
Large Related	235	195	170	600	35	90	100	225
Elderly	0	24	130	154	40	195	90	325
Other	1,810	1,440	1,370	4,620	780	325	350	1,455
Total need by income	3,240	2,554	2,355	8,149	1,115	955	1,100	3,170

Source: 2013-2017 CHAS

[10] Joint Center for Housing Studies of Harvard University. The State of the Nation's Housing 2018: https://www.jchs.harvard.edu/sites/default/files/Harvard_JCHS_State_of_the_Nations_Housing_2018.pdf
[11] Data tables found in NA-10 of the 2021-2025 Consolidated Plan.

The highest number of severely cost-burdened households are also renters and owners with incomes at 0–30% AMI. The number of severely cost burden renters is approximately 2.8 times higher than owners.

Table 32: Severe Cost Burden (> 50%) Households by Tenure

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,085	425	35	1,545	240	280	210	730
Large Related	210	35	0	245	35	15	15	65
Elderly	0	4	15	19	25	70	0	95
Other	1,630	860	530	3,020	580	195	55	830
Total need by income	2,925	1,324	580	4,828	880	560	280	1,720

Source: 2013-2017 CHAS

Overcrowding is also most prevalent in renter households with lower incomes, especially in households comprised of unrelated persons. Overcrowding often occurs when a low-income household must rent or own a home smaller than they need because the price is lower than larger units. The largest numbers of overcrowded households are single family renter households at 30 - 50% AMI[12].

[12] Data tables found in NA-10 of the 2021-2025 Consolidated Plan.

HOUSING GAP ANALYSIS

A housing gap exists when there is a greater number of households than there is housing supply at specific income brackets. Data from the 2019 American Community Survey and HUD income limit data was used to calculate the rental housing and ownership housing supply in the city of Las Cruces in 2019.

Table 25 indicates that the number of households that can afford a rental unit with a rent of $1 to $499 is over twice that of the supply of rental units in that rent range in Las Cruces. There are more rental units with a rent of $500 to $999 and $1,000 to $1,4999 than there are of households who can afford those rents indicating that there is a surplus of available units in Las Cruces. The table also shows that there is a deficit of higher priced rental units in Las Cruces.

It is important to note that this table does not take in account the quality or true demand of housing, only the supply numbers. Additionally, as household incomes increase, those households are more likely to become homeowners as they can likely afford a downpayment, closing costs, and a mortgage. The demand of high end rentals in Las Cruces is likely not high. However, the table does indicate that there is a lack of affordable rental units in Las Cruces for low-income households.

Table 33: Rental Housing Gap (Supply/Demand) Analysis

	Supply of Existing Renter Occupied Units	Number of Households Able to Afford Units	Existing Surplus (Deficit) of Units
Total Occupied Rental Supply	17,507		
$1 - $499	2,682	5,565	(2,883)
$500 - $999	11,140	4,550	6,590
$1,000 - $1,499	3,042	1,581	1,461
$1,500 - $1,999	266	3,052	(2,786)
$2,000 - $2,499	377	1,352	(975)
$2,500 - $2,999	0	803	(803)
$3,000 or More	0	156	(156)
Median Monthly Rent	791		
Rental Vacancy Rate	8.7%		
Number of Vacant Units (Weighted)			
Total Rental Supply	20,449		

Source: American Community Survey, 2019 1-Year Estimates; Crescendo Consulting Group

Table 34: Ownership Housing Gap (Supply/Demand) Analysis

Measure	Supply of Existing Owner Occupied Units	Number of Households Able to Afford Units	Existing Surplus (Deficit) of Units
Home Value			
Owner Occupied Homes	21,515		
< $50,000 (Home Value)	1,162	982	180
$50,000 - $99,999 (Home Value)	1,999	950	1,049
$100,000 - $149,999 (Home Value)	5,247	2,171	3,076
$150,000 - $199,999 (Home Value)	6,658	3,391	3,267
$200,000 - $349,999 (Home Value)	4,153	8,284	(4,131)
$350,000 - $499,999 (Home Value)	2,112	2,706	(594)
$500,000 - or More (Home Value)	184	2,406	(2,222)
Median Home Value	$165,300		
Housing Unit Vacancy Rate (% of Total Housing Units)	11.2%		
Number of Vacant Units (Weighted)	5,064		
Total Housing Supply (including rental units)	45,249		

Source: American Community Survey, 2019 1-Year Estimates; Crescendo Consulting Group

There is a surplus of the number of households who can afford houses under $200,000 in Las Cruces. However, the tables do not take in consideration the quality and size of the available supply. Houses under $50,000 may not be livable or meet the needs of a household without extensive rehabilitation. There is a deficiency of houses over $200,000. Households that can afford houses over $200,000 are more likely to custom build a new home or buy an existing home in one of the new developments in Las Cruces.

The sales market gap analysis indicates that households earning less than 80% AMI will need some sort of subsidy to afford the median priced home in Las Cruces. However, the 2020 MLS data revealed that the median sale price in Las Cruces in 2020 was $200,000. A continued increase in the median sales price will continue to make homeownership for low-income households increasingly more difficult.

Downpayment assistance programs, interest rate subsidies and lower cost units constructed by Tierra Del Sol and Habitat for Humanity are all strategies for meeting demand for affordable homeownership opportunities for low-income households.

Table 35: Sales Market Gaps

	Potential Buyers (current homeowners excluding renters)	Income Limit	Affordable Price	Units Available (12 m supply)	Median Priced Home	Subsidy Needed
0-30%	980	$13,539	$49,900	17	$165,300	$115,400
31-50%	633	$22,565	$83,200	172	$165,300	$82,100
51-60%	317	$27,078	$99,800	87	$165,300	$65,500
61-80%	1,443	$36,104	$133,200	269	$165,300	$32,100
81-100%	1,842	$45,130	$166,400	316	$165,300	None
101-120%	2,641	$54,156	$199,700	73	$165,300	None
120% and over	13,416	>$54,156	>$199,700	252	$165,300	None
Total Occupied Homeowners (excl. current renters)	21,273					

SOURCE: 2020 MLS Data; American Community Survey, 2019 1-Year Estimates; Crescendo Consulting Group

AVAILABILITY OF ACCESSIBLE HOUSING

The Mesilla Valley Public Housing Authority has some fully accessible rental units in the affordable housing stock, as are some of the privately held price restricted rentals, though much of the older rental housing stock is not accessible. While new HOME funded units must have 5 percent of units accessible, demand for fully accessible units for those with very low and low-incomes is higher than the available inventory.

SECTION III: EVALUATION OF FAIR HOUSING LEGAL STATUS

SECTION THREE: EVALUATION OF FAIR HOUSING LEGAL STATUS

FAIR HOUSING COMPLAINTS:

EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING STATUS

Las Cruces residents filed 23 complaints with HUD between January 1, 2015 and December 31, 2019. These 23 complaints resulted in 18 individual cases filed. The most frequently named protected class was disability, followed by race and familial status. The highest number of highest number of cases occurred in 2016 and has since declined. The most common protected class affected is those living with a disability.

Table 36: Summary of HUD Complaints, 2015-2019

	2015	2016	2017	2018	2019	Total
Number of Cases	3	7	5	1	2	18
Number of Complaint Issues:	3	11	6	1	2	23
Most Common Protected Class Affected	Disability	Disability	Disability, Race	Familial Status	Disability	Disability

Source: HUD, FHEO Filed Title VIII Cases, https://catalog.data.gov/dataset/fheo-filed-cases

The City of Las Cruces also collects Fair Housing complaints and, if warranted, will refer the community member to file an official complaint with HUD. From 2016 through 2019, the City of Las Cruces received X complaints from community members.

Table 37: Summary of Housing Complaints Received by City of Las Cruces, 2016-2019

	2016	2017	2018	2019	Total
Number of Cases	41	55	55	112	263
Number of Complaints Referred to HUD	1	3	3	3	10
Most Common Concerns	Landlord / Tenant disputes; repairs	Landlord / Tenant disputes; repairs	Landlord / Tenant disputes; repairs	Landlord / Tenant disputes; repairs	

Of the complaints received by the City and referred to HUD, most were due to landlords refusing to accommodate persons with disabilities, acceptance of service animals, or housing voucher discrimination. In many cases for non-HUD referred complaints, community residents were advised to advised to contact Legal Aid for further guidance.

IDENTIFICATION OF FAIR HOUSING CONCERNS OR PROBLEMS

Impediments to fair housing choice include any action, omission or decision taken because of race, color, religion, sex, disability, familial status, or national origin that may restrict housing choices or the availability of housing choices. This section addresses housing problems related to discriminatory and illegal practices, as well as general and specific local housing concerns that may occur. The discriminatory and illegal practices listed below are examples and definitions of the kinds of discrimination that could occur in a community with respect to housing, which are considered illegal under the provisions of the Fair Housing Act and are not intended to imply that these practices are occurring in a community.

1. Discriminatory And Illegal Practices

Advertising or printing and/or publishing or causing the printing and/or publishing of any notice, statement or advertisement in the sale or rental of a dwelling which shows preference, limitation, or discrimination.

Blockbusting is the unethical real estate practice of creating fear by moving one or more households of another race or creed into a neighborhood, then exploiting the situation by urging residents to sell their homes at deflated prices.

Control of listings is when a real estate agent or broker refuses to list a home or rental because it is minority-owned or because of the neighborhood in which it is located.

Discrimination in the provision of brokerage services may result when a minority or disabled real estate agent or broker is denied membership in a multiple listing directory or other organization.

Lending practices are discriminatory when different credit standards are used to qualify minority and non-minority home buyers. In addition to race, such things as marital status, age, sex and number of dependents may also be the basis for discriminatory lending practices.

Rental practices discriminate against minorities, families, seniors, or persons with disabilities when a landlord charges higher rent for equivalent units, misrepresents information concerning unit vacancies, requires larger security deposits and/or uses different or higher standards of tenant approval.

Steering is the practice of directing a prospective buyer away from a certain property due to a person's race, color, religion, sex, disability, familial status, or national origin.

Many of the above described discriminatory practices may occur unknowingly. When discrimination occurs in the area of housing, it encourages segregated living patterns and housing markets. These discriminatory practices are often difficult to see and document. Those who have been discriminated against must bring charges of housing discrimination to the attention of local, state or federal authorities in order to detect and enforce against such illegal practices.

2. General Housing Concerns/Preferences

Las Cruces residents are served by the Mesilla Valley Public Housing Authority, which is the largest provider of affordable housing units and tenant-based rental assistance in the city. The Housing Authority operates a variety of programs for residents of Las Cruces and throughout Dona Ana County, including Section 8 choice vouchers, public housing, and elderly price restricted rental units. The Housing Authority administers 1,627 housing choice vouchers within the City of Las Cruces and throughout Dona Ana County. They also own 248 public housing units located in Las Cruces, and 40 Section 8 new construction units, which are located within the City and throughout Dona Ana County.

The Housing Authority provides 40 Family Unification Vouchers, 55 VASH Vouchers for homeless veterans, 100 Non-Elderly Disabled (NED) vouchers for non-elderly disabled families, 17 homeownership vouchers and 1,415 regular housing choice vouchers.

EXPIRING HOUSING ASSISTANCE CONTRACTS

At this time, the Mesilla Valley Public Housing Authority does not have any plans to dispose of public housing units located in Las Cruces that are owned by the Housing Authority.

SPECIFIC HOUSING CONCERNS

HOUSING NEEDS OF PERSONS WITH DISABILITIES

Las Cruces is home to a variety of community service organizations and agencies that provide services to persons with special needs in the community. HUD defines special needs groups as seniors, persons with mental, physical, and intellectual and developmental disabilities (IDD), persons with HIV/AIDS, and persons with mental health and/or substance use issues. Some individuals with disabilities may have limited ability to work and earn a living, requiring them to live on Social Security Disability. They may also require modified housing units that include ramps, widened doors, and other features, and/or service enriched housing that includes assistance with activities of daily living, a group quarter, or an assisted living environment.

The next table shows the number of households with one of the four housing problems and a disabled household member. There is more renter than owner households with disabled household members and housing problems, according to CHAS data from 2012. There are more households with ambulatory limitations with housing problems than households with other limitations. Households at 80% AMI or less with a disabled household member may need a price restricted housing unit or a housing unit with accessibility features.

Table 38: HUD CHAS Household with Housing Problems with Disabled Household Member

	Total	0-30% AMI	31-50% AMI	51-80% AMI	> 80% AMI
All Households					
Household member has a cognitive limitation	2,105	665	515	445	480
Household member has a hearing or vision impairment	1,820	355	430	485	550
Household member has a self-care or independent living limitation	2,020	575	610	420	415
Household member has an ambulatory limitation	2,315	730	620	500	465
Renters					
Household member has a cognitive limitation	1,520	500	360	330	330
Household member has a hearing or vision impairment	1,255	245	260	355	395
Household member has a self-care or independent living limitation	1,410	465	400	285	260
Household member has an ambulatory limitation	1,625	600	410	380	235
Owners					
Household member has a hearing or vision impairment	585	165	155	115	150
Household member has an ambulatory limitation	565	110	170	130	155
Household member has a cognitive limitation	610	110	210	135	155
Household member has a self-care or independent living limitation	690	130	210	120	230

Source: HUD CHAS Data 2013-2017

Forty eight percent of all renters in Las Cruces has at least one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing). Approximately 32 percent of all renters have both a HUD-defined housing problem and a disabled household member. The most common disability is ambulatory limitations followed by cognitive limitations. Only 11 percent of homeowners have both a disabled household member and at least one HUD-defined housing problem in Las Cruces. Renters are more likely to experience a housing problem, most likely cost burden, than homeowners.

The table below shows the percent of people of people with a disability by race and Hispanic origin. Nearly one in every three Black or African American residents in Las Cruces has a disability, which is significantly higher than any other race or ethnicity. Hispanic households have a slightly higher rate of disability than the white alone population.

Table 39: Population by Disability by Race and Hispanic Origin Las Cruces, 2019

	Number with a Disability	Percent with a Disability
White	11,228	13.7%
Black or African American	1,007	34.3%
American Indian and Alaska Native	ND	ND
Asian	ND	ND
Native Hawaiian and Other Pacific Islander	ND	ND
Some other race alone	1,557	16.1%
Two or more races	ND	ND
White alone, not Hispanic or Latino	5,080	14.7%
Hispanic or Latino (of any race)	8,286	14.0%

Source: American Community Survey, 2019 1-Year Estimates

SPECIAL POPULATIONS

HUD's grant programs are designed to increase safe and affordable rental options, reduce chronic homelessness, fight housing discrimination by ensuring equal opportunity in the rental and purchase markets, and support vulnerable populations. Vulnerable populations, or defined as special populations by HUD, may have unique housing needs and are defined as the following:

Seniors - The supportive housing needs of this population may involve maintaining individuals in their homes with minor home repairs, in-home support services, at-home nursing (skilled) care, and hospice care.

Persons with Physical Disabilities - Accessible and adaptable housing is a primary housing need for people with disabilities and their families. Affordable housing with supportive services is needed to serve these populations effectively. Many people with disabilities are best served in an independent living environment. However, some may need higher levels of support and supervision. Small group home facilities are a model that may work well for persons with physical or developmental disabilities. But there can be significant financial challenges with this model.

Mental Illness - For individuals with mental health conditions, supportive housing is critical to avoid homelessness. Types of services include home based case management, therapeutic services, medication monitoring, and peer to peer support.

Substance Use Disorders – People with serious mental illness, substance use disorders, or co-occurring disorders require coordinated and accessible treatment and support. Permanent supportive housing, particularly for those who have experienced homelessness is critical to prevent future episodes of homelessness. Peer supports and case management support can be effective services for persons with substance use disorders.

Persons Living with HIV/AIDS - The supportive housing needs of persons living with HIV/AIDS are unique and varied. Some require only short-term assistance with their rent, mortgage, or utilities during times of financial insecurity. Others who have HIV/AIDS and co-occurring disorders may require longer term supportive housing. Supportive housing allows people living with HIV/AIDS to access necessary drug therapies and other health/mental health supports.

Overall, the biggest need mentioned by providers in community stakeholder interviews, community focus group meetings, and the community survey was for additional affordable housing units for very low-income households, accessible units for those with physical disabilities, transitional or permanent housing for persons experiencing homelessness and/or mental health/substance use disorders, and improved public transportation system.

Table 40: Summary of Special Population Housing Needs

Population Group	Needs for Las Cruces Residents
Seniors	Affordable independent living units Accessibility features in housing units Home rehabilitation services, especially for those on fixed incomes Mental health services Food services Transportation
Persons with Physical Disabilities	Affordable, accessible, quality rental housing Affordable, reliable, and accessible (near housing and work) Transportation options
Persons with Mental Health Conditions	More mental health providers and services Inpatient residential facilities and services Permanent, supportive housing Transitional housing
Persons with Substance Use Disorders	Inpatient and outpatient substance use disorder treatments options Detox facility Intensive inpatient residential treatment facility Transitional housing Permanent, supportive housing
Persons with HIV/AIDS	Low cost affordable rental housing units Mental health providers and services

Source: Crescendo Consulting Group; Community Stakeholder Interviews

HOUSING NEEDS FOR SENIORS

The senior population (65 years old and over) is the fastest growing population in Las Cruces. From 2010 to 2020, the 65 to 84 year old age group increased 28.7 percent while the 85 and over age group decreased 17.6 percent yielding a net growth of 11.1 percent. [insert age group projects]. As people age, they may develop additional housing and community service needs, such as transportation to medical appointments or assistance with day-to-day household tasks.

Community stakeholders report an increase in the number of seniors with medical issues, including mental health and increasing need for home based services. Additionally, transportation to medical appointments, grocery stores, and to social events and activities was also identified as a need. Due to the COVID-19 pandemic, more seniors are homebound then ever before and social isolation and mental health conditions may become more prevalence in the senior population as short-term and possibly long-term effect of the pandemic.

Table 33 below shows the numbers of senior households in Las Cruces in 2017 with one or more housing problem as defined by HUD. There were 890 senior households at 30% or below of the area median income (AMI) and 1,415 households between 31-50% of the AMI with one or more HUD defined housing problem. A large percentage of low and moderate income senior households in Las Cruces had at least one of the four housing problems, the most common being cost burden.

HUD defines "elderly" as those aged 62 to 74 and "extra elderly" as those aged 75 and above. Table X shows that elderly homeowners are more likely to cost burden than renters in Las Cruces. This is likely due to the limited fix income that seniors often live on and the high costs of maintaining an older home or the purchase of a newer home.

Table 41: Seniors with One or More Housing Problems

	Total	0-30% AMI	31- 50% AMI	51- 80% AMI	81-100 % AMI	> 100 % AMI
All Households						
Elderly	8,075	620	795	1,135	420	5,105
Extra Elderly	4,460	270	620	790	345	2,435
Renters						
Elderly	2,085	355	440	370	135	785
Extra Elderly	1,170	120	210	305	130	405
Owners						
Elderly	5,990	265	355	765	285	4,320
Extra Elderly	3,290	150	410	485	215	2,030

Source: HUD CHAS Data 2013-2017

HOUSING NEEDS FOR MINORITIES

The city of Las Cruces is a minority majority community with approximately 60 percent of the population identifying as Hispanic or Latino. As the city grows to grow, it continues to become more diverse. The Black or African American, American Indian and Alaska Native, and Asian populations have all increased since 2010. While data is not available on all races, Hispanic or Latino households are more likely to live in poverty than white households and have lower median incomes. However, over the recent decade, the median income for Hispanic or Latino household has increased consider to the median household income of white households in Las Cruces.

As the population of minority racial and ethnic groups grows, housing providers and local agencies must continue to ensure that outreach is conducted in communities of color and through information channels appropriate to each group to ensure access to housing resources.

Table 42: Change in Population by Race, 2010-2019

	Percent Population 2010	Percent Population 2019	Percent Change
White	89.9%	80.6%	↓10.6%
Black or African American	1.5%	2.8%	↑86.6%
American Indian and Alaska Native	1.7%	1.9%	↑11.7%
Asian	1.1%	2.1%	↑90.9%
Native Hawaiian and Other Pacific Islander	ND	0.2%	NA
Some other race alone	3.6%	9.3%	↑158.3%
Two or more races	2.2%	3.0%	↑36.6%

Source: American Community Survey, 2010, 2019 1-Year Estimates

Table 43: Change in Population by Ethnicity, 2010-2019

	Percent Population 2010	Percent Population 2019	Percent Change
Hispanic or Latino	58.3%	68.8%	↑18.0%
Mexican	54.7%	61.0%%	↑11.5%
Puerto Rican	0.2%	0.3%	↑50.0%
Cuban	0.0%	0.4%	NA
Other Hispanic or Latino	3.3%	7.1%	↑115.2%

Source: American Community Survey, 2010, 2019 1-Year Estimates

Table 44 shows the median income of households in Las Cruces by race and ethnicity. White households and Hispanic or Latino households earned approximately the same median income in 2019. Black or African American and “Other” earned above the median incomes while “Two or More Races” earned significantly less.

Table 44: Median Income of Households by Race, 2019

	Median Income
White	$45,264
Black or African American	$58,073
American Indian and Alaska Native	$41,488
Asian	ND
Native Hawaiian and Other Pacific Islander	ND
Other	$55,729
Two or more races	$30,644
Hispanic Origin	$44,161

Source: American Community Survey, 2019 1-Year Estimates

HOUSING NEEDS FOR THE HOMELESS

Persons experiencing homelessness or those at risk of becoming homelessness continues to be a growing need in Las Cruces. The New Mexico Coalition to End Homelessness (NMCEH) leads the Continuum of Care planning process in its efforts to address the needs of people experiencing homelessness and those at risk of homelessness in Las Cruces. As a part of this process, an annual Point in Time count (PIT) of the sheltered and unsheltered homeless populations is conducted in Las Cruces and statewide as part of HUD's national strategy to end homelessness.

The most recent Point in Time Count (PIT) survey[13] was completed on January X, 2019 by NMECH. At the time of the survey, 497 individuals were homeless in Las Cruces. Of the 497 individuals, 329 were sheltered and 168 were unsheltered. Approximately one in three homeless individuals were identified as chronically homeless. NMCEH estimates that on any given night in Las Cruces, there are 184 sheltered and 11 unsheltered individuals.

Within the city of Las Cruces, Mesilla Valley Community of Hope a variety of temporary and permanent housing options for those experiencing homelessness. Additionally, they manage Camp Hope, a tent city with 50 tent pad sites, full service bathroom, and a kitchen. La Casa, Inc. provides services for victims of domestic violence. Families and Youth, Inc. provide wraparound services for homeless youth and families in Las Cruces. Gospel Rescue Mission also provides emergency food and lodging services in Las Cruces and is open 24 hours a day, seven days a week.

Community stakeholders from Community of Hope, Families and Youth, Inc., and Las Casa have all stated that finding permanent housing for homeless individuals in Las Cruces can be difficult. Many individuals qualify for rental assistance programs, such as Housing Choice Vouchers, but many private landlords are not willing to rent to those with vouchers. Additionally, many homeless individuals may have mental health conditions and/or substance use disorders that require additional wraparound services that can be difficult to access. The Community of Hope campus, however, is unique in that it serves almost as a "one-stop shop" for individuals as the campus is home to laundry and mail services, a legal clinic, a medical clinic, and more.

The COVID-19 pandemic has affected many households across the country and in Las Cruces. With the closing of nonessential businesses and job losses in the community, many households, especially low income households, have struggled more than ever to pay rent, utilities, and food costs. Many households may be on the brink of homelessness at any given moment. Thanks to a national eviction moratorium and federal and state rental/mortgage assistance programs, households struggling financially due to the pandemic can receive the help they need to stay in their homes. However, as eviction moratoriums lift and rental/mortgage assistance program funds run out, there could be a rapid increase of homeless individuals in the community.

[13] Las Cruces Point in Time Survey results can be found in the 2021 – 2015 Consolidated Plan.

Table 45: Homeless Needs

	Estimate the # of persons experiencing Homelessness on a given night	
	Sheltered	Unsheltered
Persons in households with adult(s) and children	184	11
Persons in households with only children	3	4
Persons in Households with only adults	145	157
Chronically homeless Individuals	55	67
Chronically homeless families	6	1
Veterans	39	21
Unaccompanied Child	3	4
Person with HIV	1	1

Source: New Mexico Coalition to End Homelessness, 2019

The City of Las Cruces and its partners provide a continuum of homeless facilities and services for individuals and families experiencing homelessness and those who are at risk of becoming homeless. Programs provided through the Continuum of Care include emergency shelter, supportive services, transitional housing, permanent supportive housing and Housing First (Rapid Rehousing).

The New Mexico Coalition to End Homelessness (NMCEH) takes the lead in developing New Mexico's Balance of State Continuum of Care Plan. NMCEH convenes and manages the Continuum of Care planning process and the Mesilla Valley Community of Hope provides multiple services for individuals experiencing homelessness and the chronically homeless population in Las Cruces. Table 37 below outlines the numbers of beds under each umbrella category. The following section describes facilities and services in detail.

Table 46: Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	70	0	34	108	0
Households with Only Adults	12	0	26	132	0
Chronically Homeless Households	0	0	0	22	0
Veterans	0	0	0	101	0
Unaccompanied Youth	0	0	0	0	0

Source: New Mexico Coalition to End Homelessness, 2019

Mesilla Valley Community of Hope (MVCH) is a service center designed to assist individuals experiencing homelessness and address poverty issues in Las Cruces and Dona Ana County. MVCH offers case management, a day shelter, an overnight tent city for individuals who are homeless, and assistance with disability applications and other community resources to help transition from homelessness into permanent housing solutions. Continuum of Care programs administered by MVCH include Sue's House, a Permanent Housing program for chronically homeless women, the Oak Street Apartments for homeless veterans with the Mesilla Valley Public Housing Authority, two HUD Rapid Rehousing programs which serve 40 people, the Abode permanent supportive housing program for chronically homeless men, and a Supportive Services for Veteran's Families (SSVF) Program. Other housing programs include short term housing in apartments for up to three months, rapid rehousing assistance, and homeless prevention assistance. MVCH also offers services such as case management, laundry, showers, lockers, assistance in obtaining identification and public income, and access to computers.

Gospel Rescue Mission is the only indoor shelter in Las Cruces that offers emergency food and shelter and is accessible 24 hours per day year round. The shelter is operated by 70 volunteers and seven paid staff members, is self-funded with no city, state or federal funding sources and will take families and individuals.

El Caldito Soup Kitchen is a non-profit provider of food and meals for homeless and low-income people in Las Cruces and the surrounding rural communities. El Caldito offers a mid-day meal to between 250 and 300 persons six days per week and is staffed by three-part time employees and several volunteers. The agency also provides sack lunches on Saturdays.

Families and Youth, Inc. is an organization geared toward helping families and at-risk youth and children. It operates a permanent supportive housing program for youth and families..

La Casa Domestic Violence Shelter can shelter up to 80 people and approximately 26 children for up to 90 days. This includes both men, women, and families. La Casa has transitional housing units which they own (5 units which are scattered site units). It provides non-residential support as well. The shelter itself is typically full about 80% of the time. In 2009, the shelter expanded due to an increasing need to assist more female and male victims of violence. The agency's transitional housing program assists 22 families with tenant-based rental assistance through the continuum of care progress. Residents and those seeking services must have proof of documentation or they cannot be assisted, which agency staff identifies as an issue for undocumented community members in need. The tenant-based rental assistance provided through HOME funds allows up to 24-month stay. Las Casa also provides non-residential counseling/case management, legal advocacy, immigration specialists to determine status, and a court-ordered batterer program. La Casa has an MOU with Catholic Charities who is able to help undocumented persons and immigrants in Las Cruces.

Amador Health Center is significant partner of MVCH. It is located at the MVCH campus and operates five days per week. It provides primary health care, prevention education, diagnostics/treatment center, chronic disease management and is a Federally Qualified Health Center (FQHC). Amador Health Center has a full time nurse practitioner, volunteer doctors, and provides Medicaid enrollment assistance on site. The outreach program operates an eye clinic and a foot clinic. They collaborate with the Department of Health on Harm Reduction Strategies and operate the Dona Ana Indigent program that targets low-income people who are not eligible for other insurance. Amador also has Behavior Health Program funded by The Substance Abuse and Mental Health Services Administration (SAMHSA). The program provides counseling, substance abuse outpatient services (including medication assisted treatment), and job readiness assistance.

Jardin de los Ninos is an early childhood education program that provides education, therapeutic, and other comprehensive services to children and their families who are experiencing homelessness and at risk of homelessness. The childcare facility is located on the MVCH campus and the agency coordinates with other homeless providers to support homeless families with children.

Las Cruces Veteran Affairs operates the Las Cruces New Mexico VA Community Based Outpatient Clinic (CBOC) that delivers primary care services to eligible veterans in Dona Ana County and outlying areas. It provides health screening, health promotion, education, acute and chronic disease management, primary and mental health care. The New Mexico VA Health Care Systems' Health Care for Homeless Veteran's Program (HCHV) is designed to end veteran homelessness through outreach, community partnerships, and establishing health care access for veterans by aiding with benefits and discharge documents. Other services include psychiatric assessments, alcohol and drug treatment, case management, and assistance with basic needs. The VA offers veterans' access to a Compensated Work Therapy Employment Program (CWT) for veterans in recovery.

The VASH Program is the local VA Supportive Housing Program that serves homeless veterans with health, mental health, and substance use challenges in Las Cruces. The VASH program currently has 55 vouchers in Las Cruces. The program provides two VASH staff located at the housing authority to discuss the program with potential program participants and to assist them in obtaining housing and health care. VASH is well coordinated with MVCH, which provides flexible funds for security deposit, rent arrears and issuing vouchers to clients. The Mesilla Valley Public Housing Authority operates the HUD VASH Program for homeless veterans who have health, mental health, and substance use disorders. It is the provider of 55 VASH Vouchers and works directly with the VA to serve homeless veterans.

Conclusion: Las Cruces has a robust homelessness and special needs housing delivery and wraparound services system. However, community providers and residents have indicated there is a need for more mental health and substance use treatment providers in the city. Continued coordination among homelessness and housing providers to increase opportunities for individuals experiencing homelessness to obtain and retain affordable housing is essential in Las Cruces.

DISPLACEMENT

There have been no known instances of displacement of residents as a result of governmental action.

SECTION IV: IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

SECTION FOUR: IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

HUD requires that jurisdictions review previously identified impediments to fair housing choice as part of the update of the Analysis of Impediments update. Crescendo Consulting Group has completed this review and will be recommending changes in the wording and identification of some Impediments.

REVIEW OF 2016 IMPEDIMENTS

IMPEDIMENT 1: LACK OF KNOWLEDGE ABOUT FAIR HOUSING ROLES AND RESPONSIBILITIES OF CONSUMERS AND PROVIDERS.

ANALYSIS: Roles and responsibilities of both consumers and housing providers under federal and local Fair Housing rules can be complex and often up-to-date, accurate information is not readily available. Information gathered from both consumers and housing providers pointed to the need for continued educational efforts to raise the level of awareness regarding Fair Housing. Key informants and the community survey indicate that citizens with limited English proficiency and immigrants who are not familiar with Fair Housing protections do not always realize that they are the victims of discrimination when they search for housing options. Housing providers, both private and community based, often are not adequately informed about their responsibilities in marketing, processing applications, and tenant selection under Fair Housing guidelines. During the qualitative research of the Consolidated Plan, many community residents were not familiar with Fair Housing laws. Of the total number of community residents who completed the community survey, approximately 20 percent were very familiar with Fair Housing Laws while 26 percent were not familiar at all.

IMPEDIMENT 2: HOUSING CONSUMERS WITH LIMITED ENGLISH PROFICIENCY HAVE DIFFICULTY IN UNDERSTANDING AND ACCESSING INFORMATION ON FAIR HOUSING AND THE OFTEN COMPLEX FORMS AND DOCUMENTS USED IN OBTAINING SERVICES OR COMPLETING A TRANSACTION FOR HOUSING.

ANALYSIS: Key informants, public meeting participants and data on non-English speaking residents indicates that applicants with limited English proficiency have challenges understanding the often complex legal documents that a required in order to enter into contracts for the leasing or purchasing of housing and any documents required to obtain loans. While Census data indicates that households widely speak English, not all households may be fluent to understand legal language, which is often written at a college reading level That is a substantial portion of housing consumers who would be challenged understanding complex legal documents if they are only presented in the English language. Generally, the numbers of consumers who speak English fluently are lower than the number of consumers who can read English “very well”. It can be deducted that a significant number of residents also have various sensory disabilities which make it challenging to read or understand explanations of complex legal concepts. Approximately 15 percent of Las Cruces residents have a hearing, visual or cognitive impairment.

IMPEDIMENT 3: DISCRIMINATION BY PROPERTY OWNERS AND MANAGERS, AGAINST PERSONS WITH DISABILITIES AND HISPANIC RESIDENTS LIMITS THESE GROUPS FROM EQUAL ACCESS TO HOUSING.

ANALYSIS: Civil Rights complaint data, lists those with disabilities as the highest proportion of residents experiencing discrimination in the housing market. From 2015 through 2019, HUD received 23 complaints for Las Cruces residents and the most common protected class involved in the complaints were persons living with a disability. Additionally, housing complaints received by the City of Las Cruces that were referred to HUD were largely centered around landlords not accommodating the needs of a person living with a disability, such as high-vis paint on steps for visually impaired persons or service dogs.

IMPEDIMENT 4: THE INCREASING COST AND SCARCITY OF BOTH RENTAL AND FOR SALE HOUSING DISPROPORTIONATELY IMPACTS PERSONS WITH DISABILITIES, AND HISPANICS AS QUANTIFIED IN THE CONSOLIDATED PLAN AND THE HOUSING CONCERNS SECTION OF THE ANALYSIS OF IMPEDIMENTS.

ANALYSIS: While 48 percent of all renters in Las Cruces has one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing), renters with disabilities have a higher rate of housing problems, depending upon the disability type. Thus, renters with a disabled household member have disproportionate instances of housing problems, most likely cost burden. In the previous 2016-2020 Consolidated Plan, Hispanic households earned incomes 22 percent lower than the median incomes for white households. However, 2019 data shows that the median incomes for both white and Hispanic households are almost the same. The housing gap charts, Tables 33, 34, and 35, show that a major barrier to Fair Housing Choice is the lack of units available to households with limited incomes. The lack of affordable units, results in many residents who are cost burdened and cannot afford the units available in the market.

PUBLIC SECTOR: CITY OF LAS CRUCES

As part of the required analysis for public policies and actions that affect Housing Choice in Las Cruces, Crescendo Consulting Group has reviewed Las Cruces' Comprehensive Plan (known as Elevate Las Cruces), the development and zoning regulations, and the building code requirements promulgated by the City.

COMPREHENSIVE PLAN REVIEW:

The City of Las Cruces adopted its new Comprehensive Plan, Elevate Las Cruces, on February 18, 2020. Elevate Las Cruces is Las Cruces' unified policy guide and action plan for enhancing the city's long-term prosperity and happiness by building a city that is environmentally, fiscally, and socially sustainable. The comprehensive planning process began in the summer of 2018 and included the collective input of City staff, Las Cruces residents, business owners, property owners, and more to create a shared community vision that will guide and support policies and actions that will be implemented over the next 25 years. Elevate Las Cruces includes substantive elements that address Housing Choice and makes policy changes to help incentivize and encourage more affordable housing in the city.

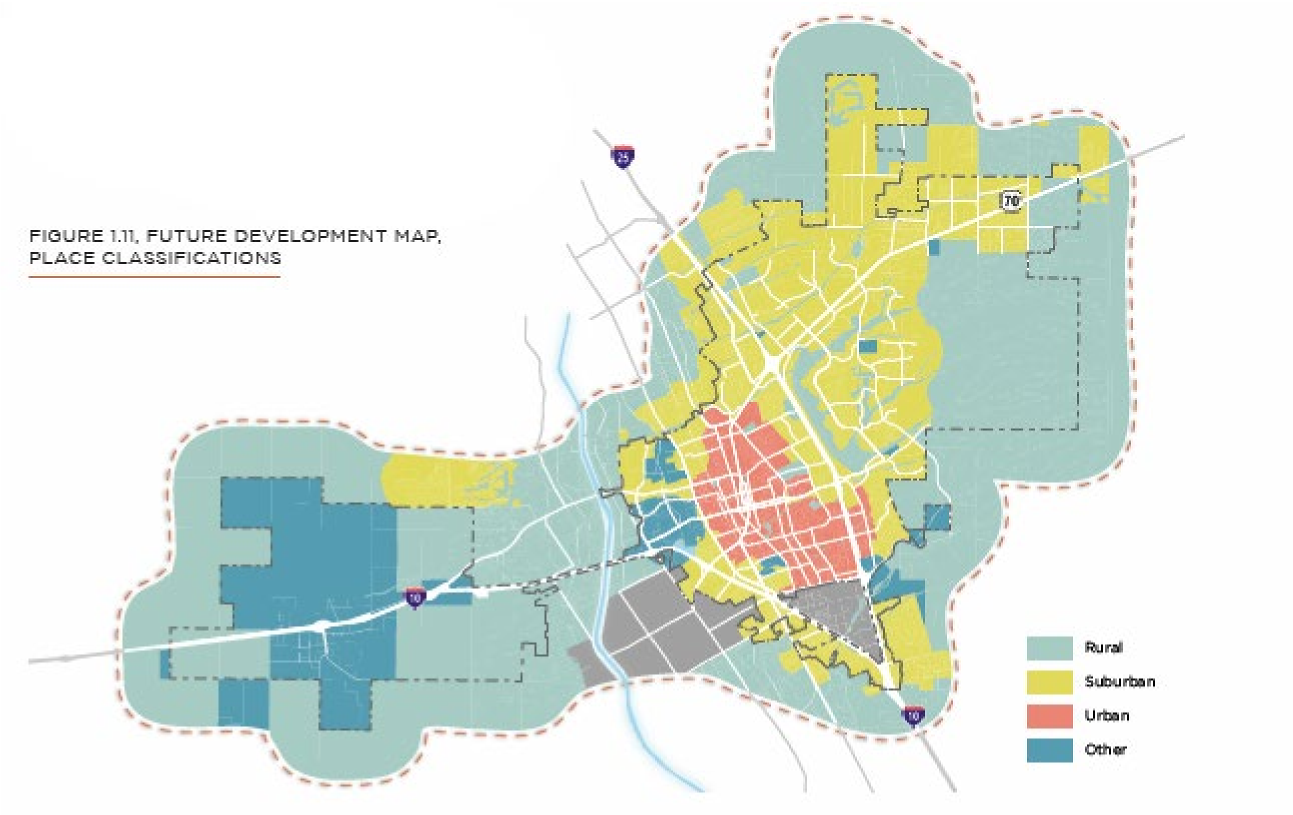
VISION "Las Cruces is an inclusive community, recognized for its cultural diversity, enchanting natural amenities, and vibrant quality of life. We are committed to enhancing our livability, prosperity, and environment for the shared benefit of current and future generations of Las Crucens in a fiscally and socially sustainable manner."

Elevate Las Cruces used a scenario-based planning approach to help develop the "preferred" scenario for future growth within and around Las Cruces. Four different scenarios were presented, reviewed, and discussion by the comprehensive plan committee and ultimately, the "consensus scenario," which contains elements of three different scenarios serves as the foundation for the Elevate Las Cruces Future Development Map and Major Thoroughfare Map.

The Consensus Scenario is connected to housing choice by incorporating the following key features:

- Development is promoted within urban place types and is directed to new centers and corridors within suburban place types.
- Infill is more prevalent in proximity to town centers, mixed-use corridors, and major intersections.
- Future development clusters are located in close proximity to existing City infrastructure.
- Development encroachment into the East Mesa is limited during the 25 year planning period.
- Entitled lots approved by the City prior to the comprehensive planning process absorb a large portion of projected residential development.

Through its Elevate Las Cruces plan, the City of Las Cruces is implementing a place-based approach to future development. This approach "to planning looks beyond the basic use of land to also consider building and site design characteristics – including development intensity, form, appearance, and physical arrangement – to present the preferred image of the entire community over an extended period." Places most relevant to Housing Choice include suburban neighborhoods, urban neighborhoods and downtown, neighborhood and town centers, and mixed-use corridors.



Source: Elevate Las Cruces Volume I

Over the next 25 years, the City of Las Cruces hopes to add 10,790 single family dwellings and 5,310 multi-family dwellings within city limits[14]. A majority of the new single-family and multi-family dwellings will be concentrated in the suburban, urban, neighborhood centers, and mixed-use corridors.

Suburban Neighborhood

"Suburban Neighborhoods provide for low-to-moderate density residential land uses intermixed with areas of commercial development. Predominant land uses include single-family and multi-family development, retail and office uses, and other ancillary institutional and public uses such as schools, parks, and places of worship."

Development strategies include:

- Distribute areas of multi-family development to promote mixed-residential neighborhoods.
- Provide diversity of residential building types, lots sizes, density ranges, and architectural styles.
- Locate multi-family development near employment, activity, transit, and trail corridors.

Urban Neighborhood

"Urban Neighborhoods include a variety of residential housing types at medium-to-high densities and areas of supporting neighborhood commercial development. The place type includes single-family and multi-family dwelling types, neighborhood retail and office uses and contains many of the City's established neighborhoods and historic residential areas closer to center city. This place type also supports live-work units."

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Development strategies include:

- Permit a diverse mix of single-family detached housing types including variations in lot sizes, build-to lines, and other spatial characteristics.
- Promote higher development intensities along major thoroughfares, especially those with transit service.
- Reduce off-street parking requirements using on-street parking spaces and shared parking provisions.

Neighborhood Center

"Neighborhood Centers include a mix of residential and non-residential land uses that provide nodes of community activity for surrounding residential neighborhoods. These walkable activity centers provide local employment, shopping, and entertainment opportunities and provide for a diverse mix of residential living options. Neighborhood Centers are located at key neighborhood intersections and provide a transitional between single-family residential neighborhoods and areas of higher development intensity."

Development strategies include:

- Construct mixed-use buildings with upper-floor residential and ground floor flex space for residential and non-residential uses near major intersections.
- Construct transitional high-density residential development along roadways that provide access to lower-density single-family development.
- Allow for centers of employment along major corridors.
- Design projects to facilitate walking or biking to jobs, shopping, entertainment, and recreation.
- Locate development along transit and trail corridors to promote transit-oriented and trail-oriented development.

Mixed-Use Corridors

"Mix-Use Corridors support a mix of residential and non-residential land users along roadway or trail corridors. The place type mimics the built environment of a central business district or other mixed-use activity center by combining residential and non-residential land uses withing buildings or on shared parcels but arranges such uses in a linear manner along established thoroughfares."

Development strategies include:

- Construct mixed-use buildings with upper-floor residential and ground floor flex space for residential and non-residential uses near major intersections.
- Construct transitional high-density residential development along roadways that provide access to lower-density single-family development.

Elevate Las Cruces also includes a future thoroughfare development plan to accommodate the city's future growth. The plan includes a mixed modal approach of current and new roadways and roadside features. The approach includes dedicated lanes for transit, on and off-street bicycle and pedestrian projects, and improved intersections and crossing treatments.

POLICY CHANGES AND ANALYSIS

The City of Las Cruces will need to make substantial changes to its Las Cruces Development Code in order to achieve sustainable growth through its Elevate Las Cruces Comprehensive Plan. Elevate Las Cruces recommends that the City revise its Development Code using a form-based code approach that incorporates transect-based principles. The transect-based approach to zoning is already being utilized by the City within the Downtown Development Code. Key policies related to Housing Choice are identified and reviewed below.

Policy CE-1.2: Promote investment within older areas of the city through redevelopment.
Policy CE-2.1 Promote infill development strategies to sustain the city's established neighborhoods and historic residential areas.

In order for the City to obtain this goal, it must facilitate infill or higher density mixed use development in key places. To do this, the City will need to partner with property owners of vacant land and builders for infill opportunities. During the qualitative stakeholder interviews with several local builders and developers, it was revealed that it was difficult to build affordable housing on infill properties in Las Cruces due to high costs of land, high impact fees, regulations, and potential theft of building materials. To promote investment within older areas of the city, especially infill opportunities, the City needs to offer more monetary incentives, reduce impact fees even more, and/or loosen regulations and policies. Additionally, focus groups and stakeholder interviews also revealed that there is a stigma with "affordable housing" that leads to many residents saying, "not in my neighborhood." The stigma further reduces the opportunity to diverse housing type in older, established neighborhoods in the city of Las Cruces.

Policy CE-4.1: Encourage a variety of housing types into new and redeveloping neighborhoods to provide options for all ages and incomes throughout the city.

Elevate Las Cruces' goal of developing "complete" neighborhoods is derived from the concept of the Neighborhood Unit originally conceived by Clarence Perry in the early 1900s. The concept includes elements such as centered around schools and other civics and transit accommodations. In order for the City to obtain the goal of developing neighborhoods and new housing types in a variety of neighborhoods from urban to suburban, the City may need to revise its zoning policies and provide incentives for builders and developers to build a variety of housing types, especially multi-units. According to permit data pulled from the City of Las Cruces from 2010 through 2020, only 36 permits were pulled for multi-unit construction. The City has a goal of building 5,310 additional multi-unit units through 2045. In order to achieve this goal, the City of Las Cruces needs to work with builders, developers, landowners, and neighborhood residents to encourage the development of multi-units and dwellings other than single family houses. Qualitative interviews and focus groups identified a stigma around multi-unit dwellings, especially units designated as affordable. The City of Las Cruces should encourage a communitywide campaign and educational sessions so community residents can learn about the City's development plan.

TABLE 1.2, FUTURE DEVELOPMENT MAP PLACE TYPE COMPOSITION

PLACE TYPE	% OF CITY LIMITS
OPEN SPACE RESERVE	17.7%
RURAL RESERVE	2.9%
RURAL NEIGHBORHOOD	5.7%
SUBURBAN NEIGHBORHOOD	30.7%
REGIONAL COMMERCIAL	3.4%
URBAN NEIGHBORHOOD	6.9%
DOWNTOWN	0.4%
BUSINESS PARK/INDUSTRIAL	16.3%
CIVIC/INSTITUTIONAL	5.6%
OTHER (RIGHT-OF-WAY, TRANSIT, RIVER, NMSU)	10.6%

Source: Halff Associates

TABLE 1.3, CONSENSUS SCENARIO DEVELOPMENT CHARACTERISTICS

DEVELOPMENT TYPE	NUMBER (2019-2045)
SINGLE-FAMILY DWELLING UNITS	10,790 ADDITIONAL UNITS
MULTI-FAMILY DWELLING UNITS	5,310 ADDITIONAL UNITS
INDUSTRIAL BUILDING SQUARE FEET	559,000 ADDITIONAL SF
OFFICE BUILDING SQUARE FEET	1,103,000 ADDITIONAL SF
RETAIL BUILDING SQUARE FEET	1,607,000 ADDITIONAL SF
NATURAL AREA CONSUMED	3,643 ADDITIONAL ACRES

Source: City Explained

Policy CE-4.4: Integrate parks, schools, and other civic space into neighborhoods.

Neighborhoods are more than just housing. Neighborhoods include places such as schools, community gardens, parks and recreation facilities, places of worship, libraries, and other civic spaces. Elevate Las Cruces incorporates the use of parks and recreation in its neighborhood development plans. Qualitative community survey released during the Consolidated Plan research phase identified the need for more recreation opportunities for children and adults in the city. Additionally, with high rates of obesity and chronic disease across the country, city parks, recreation centers, and bicycle and walking trails all provide opportunities for exercise and healthy living.

Policy CE-8.1: Encourage green building technologies for new development and retrofitting existing development.
Policy-8.2: Encourage residents and businesses to use alternative energy sources as a means to increase energy efficiency.
Policy CE-8.3: Promote and incentivize use of renewable energy to take advantage of abundant sun and wind.

With the threat of climate change, it is important to incorporate green technology, energy efficiency, and renewable energy in all future development in Las Cruces. Las Cruces is located in region of the Unite States that can experience extreme weather, especially heat. In 2018, the City Council adopted a goal for the community to be 100 percent powered by renewable energy by year 2020 and to source at least 25 percent of its electricity from renewable energy by 2022. In order to accomplish this goal, the City needs to partner with both commercial and residential developers and builders. However, requiring the use of energy efficient HVAC systems and green technology in residential dwellings can be cost prohibitive to building, especially affordable housing. One builder said in a focus group that the new green building codes could add as much as $7,000 to

$15,000 to the cost of building a new house. With an affordable housing crisis, the added costs can make homeownership even more unobtainable for lower income households. Incentives from the city, state, or federal governments or energy companies may help lower costs for builders who are trying to build affordable housing in Las Cruces.

Policy CP-7.1: Coordinate with local community organizations to provide education and implement attainable housing.

Many of the suggested actions under this policy fall under the City of Las Cruces' Community Development Department. The Community Development Department manages CDBG and HOME grant funding that is distributed throughout the city to organizations and city departments to provide housing-related programs and services. In addition to continuing to manage these housing projects and funding, the City of Las Cruces should conduct an update to its Affordable Housing Plan to understand and provide guidance in conjunction with the Elevate Las Cruces comprehensive plan.

Policy CP-7.2: Disperse affordable housing units to promote the development of mixed-income neighborhoods.

Elevate Las Cruces emphasizes the need for housing diversity in its development plan. This includes diversity of housing types and affordability. To accomplish housing type diversity and ultimately affordable housing, the City needs to review its current zoning and building codes to ensure new housing types can be built throughout the city and infill development. Additionally, to encourage more multiunit development to help meet the housing needs as the population grows over the next 25 years, the city will likely need to incentivize builders and developers through programs like impact fee waivers, matching grants, tax credits, and more.

Policy CP-7.3: Promote improvements to existing affordable housing units to make them sage and secure.

The qualitative research revealed that a large portion of what is deemed "affordable housing" in Las Cruces may be affordable, but it not quality. Many of the affordable units, especially rental units, are located in the older neighborhoods and landlords and property owners are not maintaining the properties well and some units may have one or multiple building code violations. In addition to establishing a rental rehabilitation program to help rental property owners make health and safety improvements to affordable units, incentive programs may be needed to encourage rental property owners and low-income homeowners the opportunity to upgrade their HVAC systems and homes to be more energy efficient. The City should also investigate implementing a property maintenance code for the jurisdiction. A property maintenance code can help improve the overall health and safe of individual properties and the community as a whole.

Policy CP-7.4: Provide incentives for developing or re-purposing attainable units.

There is a shortage of quality affordable housing units in Las Cruces. With the increasing costs of materials, land, and labor, the costs of building new or renovating older properties is continuing to increase every year making it difficult for builders to build and sell "affordable houses." Qualitative interviews and focus groups identified several local builders who would like to build affordable housing options, but find the current incentives offered by the City and State not enough. Additionally, the current structure of impact fee waivers and building and development regulations may need to be reviewed and revised to provide more incentives for building new or re-purposing existing affordable housing units.

Policy CP-8.1: Support efforts to provide transitory populations permanent, stable homes.

Persons experiencing homelessness or those who are at risk of becoming homeless have unique needs. While the city of Las Cruces has robust programs and services through community organizations like the Mesilla Valley Community of Hope, Casa de Peregrinos, Gospel Rescue Mission, and others, there is a need for more temporary and permanent housing for persons experiencing homelessness. Qualitative research indicated that many private landlords do not accept housing voucher programs and there is a stigma associated with the housing voucher program and persons experiencing homelessness throughout the community. In order to provide more permanent housing options to persons experiencing homeless, the City and other organizations should consider an education outreach program to private landlords and the community at large about the housing voucher programs.

Policy CP-8.2: Educate residents about homeownership assistance programs.

The City of Las Cruces helps fund Habitat for Humanity homes which are then sold to eligible homeowners. Additionally, New Mexico Mortgage Finance Authority (MFA) offers homeownership assistance programs to qualified households. Knowledge of the programs is low and the City could help develop an advertising and outreach plan so residents are more aware of the housing programs offered by local and state organizations.

Policy CP-9.1: Encourage the use of alternative housing types, styles, and living arrangements as a means to provide additional housing opportunities.

Current land development codes and zoning do not generally allow accessory dwelling or alternative housing types such as tiny homes or container homes. By amending land development codes to allow for alternative housing types, community residents may choose to invest in building accessory dwelling that can be rented or aging parents may choose to move in with their families for care. This scenario would increase the stock of existing units available in Las Cruces. Additionally, smaller homes provide a more environmentally-friendly footprint that will help with Las Cruces' larger goal of combatting climate change and adopting more renewal energy.

Policy CP-9.2: Promote denser housing options in the urban neighborhood, downtown, town centers, neighborhood centers, and mixed-use corridors identified in the future development map.

Housing trends are shifting across the country with different generations. Many millennials prefer to live in a setting that is close to amenities such as restaurants, entertainment, shopping, and parks and recreation. At the same time, Baby Boomers and even millennials are looking to either downsize or live in smaller footprint homes. By encouraging the development of multi-unit dwellings and thus increasing density in more urban areas, this will provide a variety of housing types for various generations. For the past 10 years, only 36 multi-unit dwellings were permitted by the City of Las Cruces. The City needs to review and enhance its infill policies and land development codes and policies to incentivize more multi-unit and alternative housing types in denser neighborhoods within the city.

CONCLUSION:

Elevate Las Cruces Comprehensive Plan provides a holistic overview for future development and sustainability of the city into 2045. A large portion of the plan provides important guidance of housing and land development issues that relate to housing choice within the city of Las Cruces. The City is currently in the early phases of implementing the new plan and much of the housing-related policies fall under the Community Development Department. Many of the recommended policies and actions require additional reviews of current land development and building codes, zoning, and other city-mandated regulations. It is important that the City review each element and make appropriate revisions to aid in implementation of Elevate Las Cruces.

DEVELOPMENT REGULATIONS REVIEW

As part of the City's Affordable Housing Plan conducted by Community Strategies Institute in 2016, a detailed review of the City's land use policies and zoning codes were reviewed for potential barriers too affordable housing development and recommended changes to facilitate affordable housing development. Although the study did not find any egregious barriers to affordable housing creation in Las Cruces, the regulatory review resulted in several recommendations.

Table 47: Review of Development Regulations and Recommendations

Issue	Recommendation	Priority Level
Lack of multi-family sites close to public transit and employment centers	Proactively up-zone parcels into R-4 classification and multi-use classifications to increase the number of parcels available for affordable development.	Medium
Lack of smaller lot subdivisions which facilitate greater densities per acre.	Utilize existing flexible setback requirements for smaller lot subdivisions located in Infill Overlay Zone.	Medium
Insufficient monetary resources for Impact Fee Deferral Program for Affordable Housing. Limit of 25 units annually is too low for larger multifamily developments	Increase budget ceiling for affordable rental and for sale units that qualify under the fee waiver standard.	High
Lack of use of incentives in Zoning Code/Comprehensive Plan to make denser rental housing more affordable for households with incomes less than 50% of AMI.	Apply existing provisions for greater density and other non-cash incentives to incent developers to provide rental housing to the lowest income residents. Provide incentives that match those in the Infill Development Overlay District.	High
Limited use of Accessory Dwelling Unit Ordinance (ADU) to create more dwellings on existing lots.	Add flexibility to ordinance by opening the occupancy requirement to non-family individuals.	Medium
Lack of smaller lots for single family homeownership development.	Encourage the inclusion of the R-1A Zoning classification at least in some areas to allow for smaller lots for single family homes. Incorporate minimum lot size to 8 DUs per acre in new subdivision proposals.	High
Lack of compact development with population to support commercial uses in Downtown Business District.	Encourage and support through cash and non- cash incentives, new residential development including adding additional living units above low rise commercial buildings.	High
Parking requirements that drive higher percentages of land devoted to car parking.	Reduce parking requirements for MF development located close to public transit in compliance with reduced requirements in Comprehensive Plan & Central Business District vision for higher density development. Provide conditions for less on-site parking by allowing developer imposed restrictions on the number of autos owned by residents.	Medium
Lack of guidance that would allow for narrower road widths and other innovative techniques that would lower onsite and offsite infrastructure costs for new denser development.	The City will convene a task force to address infrastructure requirements that could be modified to lower costs and preserve public health and safety in higher density development.	Medium

Source: City of Las Cruces Affordable Housing Plan, Community Strategies Institute, 2016.

Issue 1: Lack of multi-family sites close to public transit and employment centers. While Las Cruces has significant unmet demands in both single family and multifamily affordable housing, the city has mainly focused on single family housing supply. Through the Consolidated Plan process and qualitative research, there is a high need for more affordable rental units, which could eb met through multi-unit dwellings. A review of the building permits submitted from 2010 through 2020 revealed that 36 permits issued for new multi-unit construction. Las Cruces' zoning ordinance includes the R-2, R-3, and R-4 multifamily districts, which are fairly well designed to permit potential affordable developments. The R-4 district regulations, which include minimum density high enough to help support bus/transit service and no maximum density, is particularly well suited for use in constructing affordable multifamily units. By proactively up-zoning parcels into R-4 classification and multi-use classification will increase the number of parcels available for affordable developments.

Issue 2: Lack of smaller lot sub-divisions which facilitate greater densities per acre. The Urban R-1aM zone allows for 5,000 square foot lot sizes. The Urban R-1bM allows for a minimum lot size of 3,500 square feet. On the 5,000 square foot the allowed density is eight units to the acre. On the smaller lot size, a density of 112 units per acre is allowed. The smaller lot configurations provide more development flexibility particularly in the infill overlay district because many of the older legacy lots are smaller than the lots platted in the new subdivisions in the City. In keeping with the smaller overall lot size, the City could consider allowing smaller minimum lot dimensions as well. In the older parts of the City, it may be feasible to have lots with narrower frontages. Many of the legacy lots have been platted with 25 foot frontages. In those areas, lots have been split and some existing homes have suitable siting on 37.5 foot wide lots. If a developer were to pursue an assemblage of the legacy lots, the narrower lot frontage may facilitate the placement of a few more homes on the same amount of ground. The greater density is allowed and by utilizing the greater permitted densities, lower land costs could enhance affordability of new detached units. The side setback requirements presently in place in the R-1aM and R-1bM zones allows flexibility. The side setback can vary between 0 and 5 feet depending on the development plan for the parcel.

Issue 3: Insufficient monetary resources for Impact Fee Deferral Program for Affordable Housing. The City has adopted a Development Impact Fee Waiver Program for water, wastewater, public safety, and park impact fees to assist in lowering the costs of affordable housing development, both for rental and sale units. The Ordinance allows for the Community Development Department Director to approve waivers of impact fees which meet the requirements for affordability contained in the Ordinance. The Impact Fee Waivers may be granted for any of the impact fees currently assessed by the City. In order to manage the fiscal impact of the waiver program, the City has set forth provisions for alternative payment of the waived fees from sources other than the City Department impacted by the fee waiver. The present practice is for the City to set aside a budgeted amount in its General Fund budget to provide alternative payments for the waived fees. Based on budgetary limitations, the fee waiver has been budgeted to assist approximately 4 units per year. The Ordinance allows for the payment of the waived fees from other revenue sources beyond the City General Fund. The Fee Waiver Program Administrator could choose to backfill the waived fees from other sources including federal grant dollars.

Issue 4: Lack of use of incentives in Zoning Code/Comprehensive Plan to make denser rental housing more affordable for households with incomes less than 50% of AMI. Apply existing provisions for greater density and other non-cash incentives to incent developers to provide rental housing to the lowest income residents. More incentives, both monetary, fee waivers, and tax credits may help encourage developers to build denser affordable rental units.

Issue 5: Limited use of Accessory Dwelling Unit Ordinance (ADU) to create more dwellings on existing lots. By changing the zoning and building code ordinances to allow ADUs for non-family households and alternative types of housing, such as tiny homes or containers, more affordable units may become available.

Issue 6: Lack of smaller lots for single family homeownership development. Since there is a supply of land zoned appropriately for medium density and high density multifamily development, the supply of land is not considered a constraint for the expansion of the affordable rental housing supply. While there is a supply of lots suitable for single family detached ownership development, the City could encourage new subdivisions to include a greater number of smaller lots as a way of lowering the cost of new ownership units for low and moderate income households.

Issue 7: Lack of compact development with population to support commercial uses in Downtown Business District. Elevate Las Cruces comprehensive plan encourages the development of mix-use buildings. The City of Las Cruces can encourage developers to build mixed use commercial and residential units through cash and non-cash incentives, such as impact fee waivers and tax credits.

Issue 8: Parking requirements that drive higher percentages of land devoted to car parking. In addition to the various development regulations, on-site parking requirements can also impact the development cost of affordable housing. Currently the City requires two on-site parking spaces for most residential, detached units. There is some flexibility in the requirements for attached rental and for sale units. The standard for those type of units is 1.5 to 2.0 spaces per dwelling unit. There are further reductions in parking requirements for facilities which house elderly clients or those with disabilities. Generally, those types of residential land uses allow for a parking ratio of less than one parking space per unit or bed, depending on the configuration of the facility. By encouraging multiunit development near public transit and developers imposing restrictions on number of parking spots, more land may be used for housing versus parking in Las Cruces.

Issue 9: Lack of guidance that would allow for narrower road widths and other innovative techniques that would lower onsite and offsite infrastructure costs for new denser development. The City is convening a task force to address infrastructure regulations and requirements that could help lower costs for developers and ultimately homeowners.

DEVELOPMENT PROCESS AND COSTS

As part of the research for the 2021-2025 Consolidated Plan and Analysis of Impediments to Fair Housing Choice, Crescendo Consulting Group and the City of Las Cruces has conducted a vigorous Public Participation effort including surveys, public meetings and key stakeholder interviews. The general consensus is that the Development regulations and fees associated with that process are not unreasonably onerous. The City has reinvented its permitting process and has implemented a permitting counter to allow builders and homeowners to deal quickly with City personnel in obtaining necessary guidance and approvals for housing improvements. The City has moved to an electronic development application process that allows them to process permits within zero to three business days for residential projects and zero to eight business days for commercial projects.

The City will provide fast track reviews of affordable housing development proposals through its electronic submittal system, and the priority treatment of affordable housing proposals will serve to lower the carrying costs and potential delays associated with these developments.

The City Development and Building Services Section has formulated electronic guides to assist builders and owners in navigating the development review process. The information sheets lay out a step by step process that development applications will follow. The overarching policy document is the Las Cruces Comprehensive Plan and development reviewers will use the Comprehensive Plan as the basis for assessing project suitability. The City has a Development Code which deals with all details related to the various types of development for residential, commercial and mixed use. The process of submitting an application for a multi-family development requires technical expertise, but knowledgeable professionals engaged in architecture, engineering and construction management should not find the challenges in Las Cruces greater than in other comparably sized communities.

The costs for water and wastewater appear to be in-line for an arid environment. Below is a listing of the tap fees associated with varying development sizes, typically detached homes use either a three quarter inch water tap or a one-inch tap depending on size of the dwelling. Multi-family residences require larger sizes depending on the number of units and how many fixture units are counted for each living unit. Wastewater charges are based on the size of the water meter because the larger the water connection, the more water is returned to the wastewater system.

WASTEWATER
DEVELOPMENT IMPACT FEES

APPLICABILITY

A Wastewater Development Impact Fee is assessed for each new connection to the Las Cruces Utilities wastewater supply system based on water meter size of capacity whether the water provider is the City of Las Cruces, a public water utility, a mutual domestic, a private well, or other entity.

Wastewater Development Impact Fees will not be assessed to properties within the West Mesa Industrial Park per Resolutio 15-16-LCU007.

The fee is also applicable to any increase in size of capacity. The fee will be assessed for any such increase in an amount representing the difference between the fee that would be imposed for the existing size of capacity and the fee imposed for the proposed size of capacity.

FEE

Size of Capacity	Total Fee	Fee to Builder	Customer Surcharge	Fee to Rate Base
⅝– ¾ inch meter	$1,943.00	$971.00	$389.00	$583.00
1.0 inch meter	$4,858.00	$2,429.00	$972.00	$1,457.00
1.5 inch meter	$9,715.00	$4,857.00	$1,943.00	$2,915.00
2.0 inch meter	$15,544.00	$7,772.00	$3,109.00	$4,663.00
3.0 inch meter	$31,088.00	$15,544.00	$6,218.00	$9,326.00
4.0 inch meter	$48,575.00	$24,287.00	$9,715.00	$14,573.00
6.0 inch meter	$97,150.00	$48,575.00	$19,430.00	$29,145.00
8.0 inch meter	$155,440.00	$77,720.00	$31,088.00	$46,632.00

Fees for meters greater than 8 inches will be based on $46.66 per gpm.

WATER
DEVELOPMENT IMPACT FEES

APPLICABILITY

A Water Development Impact Fee is assessed for each new connection to the Las Cruces Utilities water supply system based on water meter size of capacity.

The fee is also applicable to any increase in size of an existing meter. The fee will be assessed for any such increase in an amount representing the difference between the fee that would be imposed for the existing meter size and the fee imposed for the size of the proposed meter.

FEE

Size of Capacity	Total Fee	Fee to Builder	Customer Surcharge	Fee to Rate Base
⅝– ¾ inch meter	$2,420.00	$1,210.00	$678.00	$532.00
1.0 inch meter	$6,050.00	$3,025.00	$1,694.00	$1,331.00
1.5 inch meter	$12,100.00	$6,050.00	$3,388.00	$2,662.00
2.0 inch meter	$19,360.00	$9,680.00	$5,421.00	$4,259.00
3.0 inch meter	$38,720.00	$19,360.00	$10,842.00	$8,518.00
4.0 inch meter	$60,500.00	$30,250.00	$16,940.00	$13,310.00

In addition to water and sewer impact fees, the City also has a Public Safety Impact Fee. Presently it assessed on a square foot basis. The fee is the same for detached residences and multifamily units. The City of Las Cruces is considering an increase in the Public Safety Impact Fee. If the proposed fee schedule is adopted by the City Council, some residential units will see a moderate increase. Other smaller units would see a reduction in the fee. Part of the proposed new fee schedule would base the fee charged on habitable square footage of the dwelling. Therefore, smaller dwellings would see a reduction and larger ones would see the increase. The reduction in the fee will tend to increase affordability for those purchasers of smaller units. Below is the comparison between the proposed fee schedule and the current Public Safety Impact Fees.

Public Safety Development Fees

Residential (per dwelling by square feet of living space)	*Current*	*Proposed*	*Change*
900 or less	$466	$337	-$129
901 to 1300	$466	$552	$86
1301 to 1700	$466	$712	$246
1301 to 1700	$639	$712	$73
1701 to 2100	$639	$835	$196
2101 or more	$639	$887	$248

The City also requires a Parks Impact fee. The fee is set at $2,600.00 per residential unit including multifamily units. There is a provision that if the developer of multi-family housing provides on-site open space areas that conform with the requirements of the Parks Impact Fee regulation, that $2,600.00 fee will be reduced to $1,300.00 per unit.

Conclusion:

The Las Cruces development review process, fee schedule and the associated costs to obtain the necessary permits to undertake a housing development project are in-line with costs in other communities which are dealing with similar planning, infrastructure challenges and water availability challenges. The sum of the Las Cruces development impact fees is below the New Mexico average of $5,950 for residential fees according to a study completed by Duncan and Associates.

BUILDING CODES

Las Cruces continues to administer the 2009 Battery of Codes under the International Building Code. The 2014 National Electric Code has been adopted by the City. These codes are national codes which serve to bring efficiencies into the building regulation process because they are becoming the standard codes in many jurisdictions. This assists designers and builders in creating efficiencies because the codes are becoming a standard in most municipalities and the technical requirements do not differ substantially from municipality to municipality. This allows for efficiencies in the design process as well as the construction process because development professionals don't have to learn a different code for each city they work in. As of March 25, 2021, the 2018 NM Energy Codes (Residential & Commercial) become the mandatory minimum statewide.

The Las Cruces Residential Building Permit fee schedule charges $0.20 per square foot of gross floor area measured to the outside wall. For a 1,300 square foot home, the building permit cost would be $260.00. Depending on the project, there may be other fees associated with drainage inspections, plan review, etc.

For multifamily construction, the cost is based on the square footage the building(s). The table below illustrated how these charges are determined:

Total Project Valuation (without land cost)	Fees
Under $2,000	$50
$2,001 through $25,000	$50 for the first $2,000 plus $10 for each additional $1,000
$25,001 through $50,000	$280 for the first $25,000 plus $8 for each additional $1,000
$50,001 through $100,000	$480 for the first $50,000 plus $7 for each additional $1,000
$101,001 through $500,000	$830 for the first $100,000 plus $6 for each additional $1,000
$500,001 through $1,000,000	$3,330 for the first $500,000 plus $5 for each additional $1,000
$1,000,0001 or more	$5,830 for the first $1,000,000 plus $4 for each additional $1,000

NEIGHBORHOOD REVITALIZATION: MUNICIPAL AND OTHER SERVICES; EMPLOYMENT, HOUSING

Elevate Las Cruces comprehensive plan continually supports downtown revitalization and growth through exploring public-private partnerships to activate vacant properties downtown, encourage efforts to enhance existing properties in accordance with the Downtown Las Cruces Master Plan, and attract new businesses, residents, and mixed-use development. The City Council adopted the Downtown Las Cruces Master Plan in 2016 and the document provides guidance on development in the area.

Las Cruces citizens have access to a wide array of municipal services. Those service include libraries, police and fire protection, public services for underserved populations, cultural and entertainment activities, housing assistance, and transit options. These services are delivered in an equitable manner and there is no evidence that services are less available in neighborhoods occupied by underserved populations. In the community surveys used as part of the research for the 2021-2025 Consolidated Plan, residents expressed desire for better public infrastructure including youth centers and parks and recreational space.

Employment in Las Cruces has been affected recently by the COVID-19 pandemic with Las Cruces experiencing record high unemployment rates. The unemployment has since decreased but has remained higher than normal at the time of writing. Previously, the City created an economic development office to enhance local economic opportunities. The office concentrates on providing assistance to local businesses in an effort to encourage employment growth. The City works with existing employers and new employers to match the skills of residents with job opportunities through training and job placement services. Additionally, the City tries to coordinate youth employment agencies to ensure that younger people have an opportunity to receive training and job readiness skills so that they can compete in the changing job market.

Las Cruces has completed its Consolidated Plan for 2021-2025 and the plan prioritizes affordable rental housing as a high priority. Additionally, the City plans to continue supporting affordable homeownership programs operated by Habitat for Humanity and Tierra del Sol. The City operates an owner occupied rehab program that addresses both accessibility needs and housing preservation needs. The City works closely with the Mesilla Valley Public Housing Authority to ensure that their Public Housing units in Las Cruces remain viable and in good repair for the residents.

TRANSPORTATION LINKAGE

The City operates a municipal bus system that utilizes a loop system to cover as much of the City as is practical.

The City also operates an on demand van system that provides pick-up and return for elderly residents and those requiring special accommodation for transit.

Elevate Las Cruces and the 2018 Active Transportation Plan detail the City's vision for the integration of a multi-modal transit system that provides good connectivity between neighborhoods, commercial areas and regional transit nodes in the community. As part of Elevate Las Cruces, the City has formulated a Transit Oriented Development (TOD) framework that calls for the positioning of dense, attached housing, small commercial and retail activities within transit villages that are served by bus service, bike and walking paths and roadways linking the TOD to other parts of the City.

The Central Business Corridor and adjoining Civic Plaza will provide multi-modal transit nodes for moving through the central area and connecting residents to adjoining neighborhoods and public facilities. By emphasizing housing as part of the development plan, the City hopes to increase economic activity in the downtown area, particularly after normal working hours.

PUBLIC HOUSING. PUBLIC HOUSING AND OTHER ASSISTED/INSURED HOUSING PROVIDER TENANT SELECTION PROCEDURES; HOUSING CHOICES FOR VOUCHER HOLDERS

The policies and procedures of the Mesilla Valley Public Housing Authority (MVPHA) were reviewed through materials provided by MVPHA and stakeholder interviews with its staff.

Housing Choice Program. As of January 2021, MVPHA was serving approximately 1,600 tenants through its allocation of funds through the federal Section 8 voucher program. MVPHA has a total of 1,415 conventional Housing Choice Vouchers (HCV), 55 HUD-Veterans Affairs Supportive Housing (HUD-VASH), 40 Family Unification Program (FUP), 100 Non-Elderly Disabled (NED) vouchers, and 17 Homeownership Vouchers for a total of 1,627 vouchers.

MVPHA reports that it has as many as 1,200 households on its voucher wait list at any one time. However, many applicants request to be dropped off the list before they reach the top or are unable to be reached (an estimated 25 percent on the wait list). MVPHA reports that voucher holders have difficulty finding affordable units for a number of reasons: private landlords do not accept vouchers, there is a stigma about housing vouchers, voucher holders cannot find units that meet their needs, and more.

Affordable Units. MVPHA owns three affordable housing properties with a total of 60 units and partners with eight LIHTC developments with a total of 603 units. However, the demand for affordable rental units is still higher than the supply meaning voucher holders have to rent through private landlords. Many private landlords are reluctant to rent to voucher holders with the most common reasons being that their units may not pass the inspection or the stigma around voucher holders not caring for the properties.

Client Demographics. Approximately 43 percent of voucher holders have been in the voucher program for five or more years. One out of three voucher holders earn less than 50% AMI. Seventy two percent of voucher holders receive TANF and 52 percent receive social security, SSI, or pension. Almost 50 percent of housing voucher residents are children under the age of 17.

Accessibility. Five percent of the total public housing units are accessible. If units are needed beyond five percent, then additional units will be retrofitted to be made accessible on an as needed basis. Two percent of the public housing units are accessible to person who are visually and/or hearing impaired.

Waitlist Procedures. MVPHA has an active wait list of households waiting to receive a housing voucher. When a household leaves the program, the next eligible household on the list will be contacted. If that household is ineligible or MVPHA is unable to contact them, the next eligible household is contacted. Eligible households will remain on the list, but they must continue to meet eligibility when a voucher becomes available to them.

Occupancy Standard. MVPHA uses the "two person per bedroom" occupancy standard used by HUD. This allows MVPHA to house more families through public housing and with private landlords. BY broadening the size of the unit (and thus supply of units for voucher holders), households can live in more affordable units, enabling the housing authority to serve more people.

SALE OF SUBSIDIZED HOUSING/DISPLACEMENT

There are no plans for the sale of subsidized housing units at the time of this analysis.

PROPERTY TAX POLICIES:

The City does not administer the property tax system. The property tax collections are administered by Dona Ana County. There are provisions available for certain property tax exemptions for some types of affordable housing. Qualified entities must submit an application for tax exemptions and are reviewed and approved by the County tax authority.

PRIVATE SECTOR

HOMEOWNERSHIP LENDING POLICIES AND PRACTICES

Enacted by Congress in 1975, the Home Mortgage Disclosure Act (HMDA) requires lending institutions to report public loan data. HMDA data is available for all loans made on properties in Las Cruces. This information provides an overview of mortgage lending practices within Las Cruces in 2017[15]. Specific areas to evaluate (which may suggest potential discriminatory practices or trends) include high denial rates for minority and female applicants; very low denial rates; unusually low levels of applications from women, minorities and low and moderate-income persons; and a high number of applications withdrawn by minority applicants, as compared to non-minority applicants.

In 2017, a total of 7,963 loan applications were made in Las Cruces. Over half the loans were conventional loans with Asian/Pacific Islander and White individuals having the highest rates. Approximately one in four loans from White and American Indian or Alaska Native individuals took out an FHA loan. Black or African American and Native Hawaiian or Other Pacific Islander were more likely to use a VA-guaranteed loan. Approximately half the loans were for home purchase while the other half were for refinancing.

Table 48: Types of Loans and Purpose of Loans Originated in Las Cruces, 2017

	FSA/RHS-guaranteed	FHA-insured	Conventional	VA-guaranteed	Home purchase	Refinancing	Home improvement
Race							
Black or African American	0.00%	17.95%	38.46%	43.59%	61.54%	35.90%	2.56%
Asian/Pacific Islander	0.00%	11.90%	85.71%	2.38%	69.05%	30.95%	0.00%
White	0.29%	25.15%	58.64%	15.92%	66.74%	28.65%	4.60%
American Indian or Alaska Native	0.00%	25.00%	56.25%	18.75%	50.00%	50.00%	0.00%
Native Hawaiian or Other Pacific Islander	0.00%	8.33%	41.67%	50.00%	41.67%	58.33%	0.00%
No Info Provided	0.00%	24.80%	52.59%	22.62%	39.78%	56.95%	3.27%
N/A	0.00%	0.00%	100.00%	0.00%	82.76%	17.24%	0.00%
Ethnicity							
Hispanic/Latino	0.46%	35.10%	51.48%	12.96%	66.36%	28.59%	5.06%
Non-Hispanic	0.06%	14.26%	64.81%	20.87%	64.26%	31.88%	3.86%
No Info Provided	0.00%	22.31%	55.77%	21.92%	42.31%	55.38%	2.31%

[15] The most recently available HMDA data is 2017.

NA	0.00%	0.00%	100.00%	0.00%	83.33%	16.67%	0.00%
Gender							
Women	0.30%	33.86%	60.81%	5.03%	65.65%	29.02%	5.33%
Male	0.25%	21.20%	56.74%	21.82%	64.50%	31.45%	4.05%
No Info Provided	0.00%	21.31%	55.74%	22.95%	42.08%	55.74%	2.19%
NA	0.00%	0.00%	100.00%	0.00%	82.76%	17.24%	0.00%

Source: Consumer Financial Protection Bureau, 2017 HMDA Raw Data, https://www.consumerfinance.gov/data-research/hmda/historic-data/

Loan origination rates varies by race, ethnicity, and gender, but loans taken out by American Indian or Alaska Native were significantly lower than all other categories. Hispanic/Latino rates are still below that of non-Hispanic rates in Las Cruces. Loan Denial rate is much higher for American Indian or Alaska Native (32.65%), Hispanic/Latinos (22.99%), and women (21.45%) when compared to the overall average of 17.59 percent loan denial rate.

Table 49: Action Taken on Loan by Race, Ethnicity, and Sex, Las Cruces, 2017

Race/Ethnicity	Loan Originated	Loan Not Accepted by Applicant	Loan Denied	Application Withdrawn	File Closed	Loan purchased by the institution	Total
Race							
Black or African American	56.12%	0.72%	15.11%	17.27%	2.88%	7.91%	139
Asian/Pacific Islander	53.85%	2.56%	10.26%	11.54%	7.69%	14.10%	7
White	53.60%	3.87%	16.59%	11.43%	4.64%	9.87%	5,756
American Indian or Alaska Native	32.65%	3.06%	32.65%	19.39%	10.20%	2.04%	98
Native Hawaiian or Other Pacific Islander	70.59%	0.00%	17.65%	11.76%	0.00%	0.00%	17
No Info Provided	33.27%	3.54%	34.45%	15.05%	11.70%	1.99%	1,103
N/A	3.76%	0.26%	0.26%	0.13%	0.00%	95.60%	772
Ethnicity							
Hispanic/Latino	47.55%	3.79%	22.99%	11.77%	6.60%	7.29%	3,619
Non-Hispanic	56.19%	3.82%	12.86%	11.97%	3.78%	11.38%	2,908
No Info Provided	39.22%	3.02%	29.11%	15.69%	10.11%	2.87%	663
N/A	3.88%	0.26%	0.26%	0.13%	0.00%	95.47%	773
Gender							
Women	49.15%	4.12%	21.45%	11.31%	5.09%	8.88%	2,061
Male	51.70%	3.61%	17.58%	12.31%	5.85%	8.95%	4,681
No Info Provided	40.58%	3.10%	29.71%	15.30%	8.20%	3.10%	451
N/A	3.77%	0.26%	0.26%	0.13%	0.00%	95.58%	770

Average (%) and Grand Total	**45.77%**	**3.39%**	**17.59%**	**11.04%**	**5.22%**	**16.98%**	**7,963**

Source: Consumer Financial Protection Bureau, 2017 HMDA Raw Data, https://www.consumerfinance.gov/data-research/hmda/historic-data/

Reasons for the denial of applications are listed in Table 39 by race, ethnicity, and gender. The most frequent reasons for denial were debt to income ratio, credit history, credit application incomplete, and collateral. There was a total of 1,401 loan denials during 2017. No one racial or ethnic group had higher denial rates in a majority of categories than other groups, although Native American or Alaska Native had higher than overall denial rates in four of the nine categories. Black or African American and Native American individuals were more likely to be denied for credit history than any other reason.

Table 39 reveals underlying systemic racism that has long plagued the financial system in the United States. Current credit scoring systems have a disparate impact on people on color[16]. It is not surprising that Black or African American, and Native American or Alaska Native had the highest loan denial rate for credit history and/or credit application incomplete. Women are also most likely to be denied for credit history or debt-to-income ratio.

Table 50: Loan Denial Reason by Race, Ethnicity, and Gender Las Cruces, 2017

	All	White	Black	Asian	Native American	Hispanic	Women
Debt-to-Income Ratio	14.92%	16.86%	4.76%	0.00%	6.25%	14.78%	16.74%
Employment History	0.71%	0.84%	0.00%	0.00%	0.00%	0.96%	0.68%
Credit History	15.63%	16.86%	33.33%	12.50%	21.88%	18.63%	19.00%
Collateral	7.99%	7.75%	4.76%	0.00%	18.75%	6.49%	7.92%
Insufficient Cash	1.78%	1.99%	0.00%	0.00%	3.13%	1.80%	1.58%
Unverifiable Information	3.43%	4.29%	0.00%	0.00%	0.00%	3.00%	3.85%
Credit Application Incomplete	9.21%	7.43%	9.52%	0.00%	18.75%	5.29%	5.88%
Mortgage Insurance Denied	0.07%	0.10%	0.00%	0.00%	0.00%	0.00%	0.23%
Other	4.07%	4.19%	4.76%	0.00%	3.13%	3.61%	4.52%
Non Noted	42.18%	39.69%	42.86%	87.50%	28.13%	45.43%	39.59%
Total Number	1,401	955	21	8	32	832	442

Source: Consumer Financial Protection Bureau, 2017 HMDA Raw Data, https://www.consumerfinance.gov/data-research/hmda/historic-data/

Table 51 shows the number of high cost loans in Las Cruces. The 2008 Housing Crisis and following national foreclosure crisis illuminated the risks to borrowers who used high cost loans[17] and ended up losing their

[16] Rice, L, Swesnik D. Discriminatory Effects of Credit Scoring on Communities of Color. Suffolk University Lae Review. 46; 935 (2013).

[17] A high cost loan is defined as having the following three conditions: 1) the APR exceeds the APOR by more than 6.5 percent, 2) the total lender/broker points and fees exceed 5 percent of the total loan amount, and 3) the loan has a prepayment penalty.

homes. Risky loan products were often targeted to low-income households and minorities across the nation. In 2017, Las Cruces had a slightly higher rate of high cost loans than the state of New Mexico.

Table 51: High Cost Loans, 2017

	# of Loans	High Cost Loan %	Purchase Loans	High Cost Purchase Loans %	Refinance Loans	High Cost Refinance Loans %
Las Cruces	3,645	9.41%	2,327	12.08%	1,162	4.48%
State of New Mexico	37,465	8.59%	22,211	11.09%	13,219	1.08%

Source: Consumer Financial Protection Bureau, 2017 HMDA Raw Data, https://www.consumerfinance.gov/data-research/hmda/historic-data/

Table 41 shows that Hispanic or Latino, Asian, and Native American individuals are slightly more likely to borrow using high cost loans to purchase and refinance existing loans, though the total number of these loans in Las Cruces is very small. Las Cruces high cost loan holders are similar to the state of New Mexico high cost loan demographics.

Table 52: Las Cruces High Cost Loans by Race and Ethnicity, 2017

	# of Loans	High Cost Loan %	Purchase Loans	High Cost Purchase Loans %
Las Cruces Total	3,645	9.41%	2,327	12.08%
White	3,085	9.66%	2,059	11.61%
Black or African American	78	6.41%	48	10.42%
Asian	42	11.90%	29	17.24%
Native American	32	9.38%	16	18.75%
Hispanic or Latino	1,721	13.77%	1,142	17.25%

Source: Consumer Financial Protection Bureau, 2017 HMDA Raw Data, https://www.consumerfinance.gov/data-research/hmda/historic-data/

While the number of loans is small, the percent of high cost loan are higher for low income individuals and households. As the 2013-2017 CHAS revealed, households earning less than 80% AMI are more likely to be cost burden or severe cost burden.

Table 53: High Cost Loans by Borrower Income Range, 2017

	# of Loans	% High Cost
Las Cruces		
0 - 50% AMI	393	13.23%
51 - 80% AMI	846	13.95%
81 - 120% AMI	927	10.90%
>120% AMI	1,248	5.45%
New Mexico		
0 - 50% AMI	3,340	11.74%
51 - 80% AMI	8,003	11.08%
81 - 120% AMI	8,958	11.82%
>120% AMI	14,770	5.55%

Source: Consumer Financial Protection Bureau, 2017 HMDA Raw Data, https://www.consumerfinance.gov/data-research/hmda/historic-data/

Although HMDA data is not conclusive, it does show some racial/ethnic groups may struggle more on the dream to homeownership. Loan denial rates show that American Indian or Alaska Native, Hispanic, and women have slightly higher loan denial rates than other groups. Table 39 shows underlying systemic racism that had hurt people of color for decades. Black or African America and American Indian or Alaska Native individuals are more likely to get denied a loan due to credit history.

Additionally, while the number of high cost loans in Las Cruces are small compared to other cities in New Mexico, households earning less than 80% AMI disproportionately have high cost loans compared to higher income brackets. Approximately one in five American Indian or Alaska Native individuals has a high cost loan in Las Cruces.

Conclusion: Increased emphasis on homebuyer counseling and efforts to target populations for downpayment assistance programs and credit counseling could help increase the success rate of loan applicants in Las Cruces. Education for area lenders about Fair Housing laws and practices should be increased, and lending practices should be watched carefully, to ensure that minorities and low-income households are fairly treated**.**

PUBLIC AND PRIVATE SECTOR

FAIR HOUSING ENFORCEMENT

As part of the 2021-2025 Consolidated Plan, an online community survey was used to gather insights and perceptions of community needs within the city of Las Cruces by community residents. A total of 943 respondents completed the survey. When asked if "you have ever encountered any of the following forms of housing discrimination or known someone who has," 22.7 percent of survey respondents identified as experiencing one of the following issues:

- 42.1% experienced "refusing, discouraging or charging more to rent an apartment or buy a home."
- 38.3% experienced "discouraging a person from living where they want to live or steering them to another apartment, complex or neighborhood."
- 34.1" experienced other. A few of the comments provided by respondents include:
    - "most renters of this type destroy the property before leaving and do not understand that causes the next applicant to be rejected."
    - "Service dogs not being allowed due to breed [restrictions.]"
    - "Illegal activities, like entering without notice, illegal eviction, etc. There is no functioning housing authority here, so you have these [people] who just take every tenant to court."
    - "Gross neglect of tenant laws by landlords."
    - "Asking for my nationality."
    - "Banker told me not a good idea to own a home as a single woman."

When asked how familiar they are with Fair Housing Laws, approximately 26 percent of respondents said "not familiar at all. Approximately 54 percent said "slightly familiar" while 18.8 percent said very familiar. When asked if they felt they were discriminated against during the rental or sales process of a home or apartment do they know where to turn for help, only 15.1 percent said yes. Approximately 85 percent of survey respondents don't know who to turn to for Fair Housing issues. Of those who selected "yes," most said they would go to an attorney/Legal Aid NM, the City of Las Cruces, or HUD.

FAIR HOUSING LAWS AND EDUCATION IN LAS CRUCES

In addition to the federal Fair Housing Act, the New Mexico Humans Rights Act also prohibits discrimination based upon ancestry, sexual orientation, spousal affiliation, and gender identity.

The City of Las Cruces provide Fair Housing information on the City's Community Development Department website. Fair Housing information from HUD is available in both English and Spanish. Discrimination complaints can be filed with the City, New Mexico Human Rights Division, and HUD. The complaint forms are found on the City's website.

The City of Las Cruces provides it staff with annual training on Fair Housing and all new City staff members receive training during their employee orientation. Mesilla Valley Public Housing Authority and Mesilla Valley Community of Hope also report Fair Housing training for all staff members.

SECTION V: ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES IN THE JURISDICTION

SECTION V: ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES IN THE JURISDICTION

ACTIONS AND PROGRAMS

The City of Las Cruces has organized its fair housing programs around expanding housing choice and preserving existing neighborhoods and the single family housing stock within those neighborhoods. In order to meet that goal, the bulk of the City ‘s current fair housing activities exist to address the identified impediments that cause a lack of affordable housing and also result in discriminatory actions particularly for those with special needs. The City of Las Cruces emphasizes infill, preservation and new projects that are served by municipal services.

The City of Las Cruces cosponsors and supports the efforts of private fair housing groups which provide a variety of trainings and workshops. The City Community Development and Housing office will partner with professional associations and fair housing agencies to provide community forums and meetings educating citizens on Fair Housing laws and their importance in ensuring equal access to housing and the programs and services the City provides. The City of Las Cruces City Council has adopted a Fair Housing Ordinance that will be used as a tool to discourage discriminatory acts and practices that can limit Fair Housing Choice.

The Las Cruces 2021-2025 Consolidated Plan and 2021 Annual Action Plan proposes that CDBG and HOME funds be used for the following affordable housing activities and housing related public service activities: assisting persons at risk of becoming homeless and chronically homeless, increasing the supply of affordable, accessible housing, retaining the affordable housing stock, increasing the availability of affordable permanent rental housing to low-income and moderate-income families, expanding and maintaining emergency and short term housing. Public Service activities and non-housing community development actions include increasing the access to quality public and private facilities, making public improvements to infrastructure, offering the provision of public services concerned with creating suitable living environments for youth, those experiencing homelessness, the elderly, those with special needs and HIV/AIDS patients. The City will also pursue its economic development goals as a way to improve the economy and expand equal employment opportunities to those who have been underserved in the Las Cruces economy.

As resources and staff capacity allows, the City of Las Cruces will more actively promote the dissemination of Fair Housing Information and provide training to its subgrantees on how to comply with HUD Fair Housing requirements a, including implementing effective Affirmatively Furthering Fair Housing Marketing Plans. The City will strive to provide understandable Fair Housing information to both consumers and those engaged in the Las Cruces housing industry.

SECTION VI: CONCLUSIONS AND RECOMMENDATIONS

2021 IMPEDIMENTS TO FAIR HOUSING CHOICE – CITY OF LAS CRUCES

The impediments to Fair Housing Choice and recommended actions listed below have been identified through the preparation of this report. These impediments are not listed in any particular order of priority. Each action includes a target time period for the action to be undertaken and completed. Some actions are noted as ongoing. The 2021 Impediments listing includes and expands upon the Impediments identified in the 2016 Impediments report with the exception of the 2016 Impediment, "Housing consumers with Limited English Proficiency have difficulty in understanding and accessing information on Fair Housing" (See assessment of 2016 Impediments). The 2021 listing reflects current conditions and concerns that exist in the community.

IMPEDIMENT 1: LACK OF KNOWLEDGE ABOUT FAIR HOUSING ROLES AND RESPONSIBILITIES OF CONSUMERS AND PROVIDERS.

ANALYSIS: Roles and responsibilities of both consumers and housing providers under federal and local Fair Housing rules can be complex and often up-to-date, accurate information is not readily available. Qualitative research through stakeholder interviews, community focus groups, and an online community survey revealed that Fair Housing laws are not widely known, and many community residents don't know who to turn to if they have questions or issues in Las Cruces. The City and many community organizations that work with housing issues report that they do train staff, but general awareness regarding Fair Housing in the community is low. The City would like to increase Fair Housing awareness, roles, and responsibilities for both consumers and providers. The actions outlined below are intended to increase the knowledge base of both consumers and producers.

Proposed Actions the City will take to address Impediment 1:

- The City will continue to be a partner with other agencies and programs to increase awareness of Fair Housing Laws and policies including those at the Federal level, State level and local level. The City will provide an updated Fair Housing website as part of the Las Cruces web portal. The Fair Housing website will contain necessary information in English and Spanish including Fair Housing Laws and Ordinances as well as information on agencies to contact and the steps needed to file a complaint. It will also contain the City's adopted Analysis of Impediments to Fair Housing Action Plan. The City will provide Fair Housing materials and all other informational documents related to its Community Development activities and reports in alternative formats if requested by a disabled person. Ongoing.
- As the administrator and technical assistance provider for Federal and local housing programs the City Community Development Department will work with subgrantees as well as private housing providers to ensure that housing consumers are dealt with in a non-discriminatory fashion as defined by Fair Housing rules. The City will provide printed and electronic information to landlords and property managers that they can pass on to prospective tenants and purchasers. This information will be a brief summary of the information contained on the City's Fair Housing website. Fair Housing information will be made available in alternative formats upon request. Ongoing.
- The City Community Development Department will partner with professional associations and fair housing agencies to provide community forums and meetings educating citizens on Fair Housing laws and their importance in ensuring equal access to housing and the programs and

services the City provides. The City of Las Cruces Fair Housing Ordinance (Chapter 13: Article I) will also be explained and highlighted at public Fair Housing events. Annually.

IMPEDIMENT 2: DISCRIMINATION BY PROPERTY OWNERS AND MANAGERS, AGAINST PERSONS WITH DISABILITIES AND/OR HOUSING VOUCHER PROGRAMS LIMITS THESE GROUPS FROM EQUAL ACCESS TO HOUSING.

ANALYSIS: Key informants, community surveys and public meeting comments point to instances of discriminatory practices for individuals and households who have a member with a disability and/or a receipt of a housing voucher. Community focus groups and the community survey revealed that there is a significant stigma about people who have a housing voucher through the Section 8 or other programs. Many private landlords refuse to rent to those who have a housing voucher and with limited public housing options, many eligible individuals who have a housing voucher cannot find adequate housing. Additionally, many of the rental properties in Las Cruces are not accessible and many landlords are reluctant to allow tenants to make modifications to the property. There were several fair housing complaints filed with HUD involving individuals with disabilities.

Proposed Actions the City will take to address Impediment 2:

- The City of Las Cruces Community Development Department will continue its outreach and educational efforts to inform builders, property owners and landlords of the provisions and requirements that must be met in providing equal access to housing for the protected classes of people outlined above. The educational effort will include providing written and electronic information on how housing providers can ensure that advertising, screening processes, lease policies, and general interactions with those seeking housing are treated equally. The City educational effort will also include information for builders on ways to address accessibility requirements through the design and construction of accessible, adaptable units. The City will continue to partner with other agencies serving the Las Cruces area to educate property owners, Mesilla Valley Public Housing Authority, managers, and builders on their Fair Housing responsibilities. Partner agencies may include Las Cruces Homebuilders Association, Las Cruces Association of Realtors, New Mexico Human Rights Division, and local community organizations with involvement in Fair Housing Activities. Ongoing.
- Through online and printed Fair Housing materials, the City Community Development Director or designee, will assist complainants who wish to file a discrimination complaint, in filing the necessary forms and providing guidance and referrals on the process the City and other state and federal agencies will utilize in responding to complaints. Ongoing.
- The City will post Fair Housing Information at all facilities controlled by the City of Las Cruces. This effort will be extended to City subgrantees which provide housing services. Those agencies will be required to post the Fair Housing sign at all housing facilities assisted with local or federal funds. Ongoing.
- The City will enforce its Fair Housing Ordinance in cases of discrimination as prescribed in the Ordinance. Ongoing.
- The City will provide technical assistance and oversight to CDBG and HOME subgrantees to ensure that each agency has a compliant Affirmatively Furthering Fair Housing Marketing Plan (AFFHMP), if applicable. The City will monitor the use of the agency AFFHMP to determine the success of subgrantees in using the plan to encourage participation in housing activities by underserved populations. Ongoing.

- The City will monitor its communications and public outreach and funding activities to measure the effectiveness of its AFFHMP to ensure that underserved populations are actively recruited to participate in public meetings and housing programs and activities. Annually.

IMPEDIMENT 3: THE INCREASING COST AND SCARCITY OF BOTH RENTAL AND FOR SALE HOUSING DISPROPORTIONATELY IMPACTS LOW INCOME HOUSEHOLDS AS QUANTIFIED IN THE CONSOLIDATED PLAN AND THE HOUSING CONCERNS SECTION OF THE ANALYSIS OF IMPEDIMENTS.

ANALYSIS: Approximately half of all renters in Las Cruces have one of the four housing issues identified by HUD in the Consolidated Plan (cost burden, overcrowding or lack of kitchen or plumbing). Households earning less than 50% AMI are more likely to experience cost burden and severe cost burden than those earning high incomes, especially among renters. There is a severe lack of quality affordable rental units in Las Cruces and a hot housing market is only increasing the median sale price of homes in the City making homeownership harder for households earning less than the median income. The housing gap charts show that a major barrier to Fair Housing Choice is the lack of units available to households with limited incomes. The lack of affordable units, results in many residents who are cost burdened and cannot afford the units available in the market.

Proposed Actions the City will take to address Impediment 3:

- The City will examine current planning and development review procedures to provide fast tracking and concurrent review of affordable rental projects. Elevate Las Cruces has provided some guidelines on affordable housing going forward. The City will work with its stakeholders to update its Affordable Housing Ordinance that more clearly outlines what incentives, concessions and enhancements it will make available to increase the production of affordable rental housing that meets the needs of those with the greatest challenges. Annually.
- The City will continue to serve as lead convener of state level and federal agencies and private sources of capital to create a more robust set of tools to address the development cost of new housing. This enhanced finance approach will focus on Low-income Housing Tax Credits, HOME Investment Partnership Funding, various supportive housing financing sources, various tax exempt bonds including General Obligation Bonds and affordable loans from lenders doing business in the community. Ongoing.
- The City will review density limitations, minimum lot sizes and other regulations that may constrict housing providers' ability to produce both smaller apartments and for sale homes for sectors of the market which cannot presently afford the products available in Las Cruces. Ongoing.
- Development Readiness Measures: The City through its mapping and property records system will identify vacant and underutilized residentially-zoned properties in zoning areas that have adequate infrastructure to support greater densities for residential uses. This action could effectively steer development to sites that are considered suitable by the locality and expedite the pace at which affordable development occurs. Annually.
- The City will continue to provide limited financial assistance to households who qualify for long term mortgages. The City will utilize its Impact Fee Deferral policies for starter homes that meet the City definition of affordable housing. Annually.
- The City will track the numbers of those populations which receive assistance to alleviate the identified housing problems. Annually.
- The City will update its Affordable Housing Plan to review and develop strategies, goals, and measures to encourage and track the development of affordable housing in Las Cruces. 2021-2022.

IMPEDIMENT 4: LOAN DENIAL RATES REMAIN RELATIVELY HIGH FOR SOME RACIAL/ETHNIC GROUPS.

Analysis: Although HMDA data is not conclusive, it does show some racial/ethnic groups may struggle more on the dream to homeownership. Loan denial rates show that American Indian or Alaska Native, Hispanic, and women have slightly higher loan denial rates than other groups. Table 39 shows underlying systemic racism that had hurt people of color for decades. Black or African America and American Indian or Alaska Native individuals are more likely to get denied a loan due to credit history.

Proposed Actions the City will take to address Impediment 4:

- The City will support organizations that provide credit and homebuying counseling, such as Tierra del Sol to ensure that the programs are geographically targeted to areas in the community where loan denial rates are the highest.
- The City will provide educational information about how to access government sponsored and subsidized loans that have more flexible underwriting standards, as well as types of lenders to avoid.
- The City will work with lenders to ensure all lenders are trained on Fair Housing laws.

APPENDIX

Council Work Session Summary

Meeting: Work Session - Mar 22 2021

TITLE: FY2022 BUDGET REVIEW

PURPOSE(S) OF DISCUSSION: ☒ **Inform/Update** ☐ **Direction/Guidance** ☐ **Legislative Development/Policy**

BACKGROUND / KEY ISSUES / CONTRIBUTING FACTORS:

In November 2020, Public Works and Budget met with the Mayor and each Councilor to acquire their priorities for FY2022. Public Works and Budget have put together a list of all the Council priorities from these meetings and have developed a fact sheet for each priority.

The work session will include a discussion of the FY2022 Budget, specifically: 1) Council priorities, 2) current general fund budget and 3) current Capital Improvement Program.

PLAN(S):

Comprehensive Plan

Council Work Session Summary

Meeting: Work Session - Mar 22 2021

TITLE: PROCUREMENT CODE UPDATE

PURPOSE(S) OF DISCUSSION: ☒ **Inform/Update** ☒ **Direction/Guidance** ☒ **Legislative Development/Policy**

BACKGROUND / KEY ISSUES / CONTRIBUTING FACTORS:

The Purchasing Program administers and adheres to the City's Procurement Code (P-Code), Las Cruces Municipal Code (LCMC) Chapter 24. In 2019, portions of the code were identified for revision or new inclusion. The intention of the revisions was to provide clarity, make the P-Code more user friendly, clear up multiple cross-references between sections, and to realign and consolidate sections. Gaps in the code had been identified, including the omission of the Purchase Card Program.

The team working on the revisions decided that in addition to content, formatting changes were necessary. A comprehensive revision of the P-Code was then completed. The team discussed revision highlights with the Finance Select Committee, which was supportive of the revisions. Due to the magnitude of the impact of the P-Code, the Finance Select Committee requested further review by the entire City Council. The purpose of this work session is to inform the City Council of the proposed changes to the P-Code and to receive guidance prior to bringing an ordinance forward for consideration at a City Council meeting.

PLAN(S):

None

COMMITTEE/BOARD REVIEW:

Finance Select Committee