



CITY OF GAINESVILLE

**STATE HOUSING INITIATIVES
PARTNERSHIP (SHIP) PROGRAM**

**LOCAL HOUSING ASSISTANCE
PLAN**

**STATE FISCAL YEARS
2017-2018, 2018-2019, and 2019-2020**

Resolution # _____

Passed _____



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<ul style="list-style-type: none">A. Administrative Budget for each fiscal year covered in the PlanB. Timeline for Estimated Encumbrance and ExpenditureC. Housing Delivery Goals Chart (HDGC) for each Fiscal Year covered in the planD. Signed LHAP CertificationE. Signed, dated, witnessed or attested adopting resolutionF. Ordinance (if changed from the original creating ordinance)G. Interlocal Agreement	

Section I. Program Details:

A. Name of the participating local government: *City of Gainesville*

Is there an Interlocal Agreement: Yes No

B. Purpose of the program:

1. To meet the housing needs of the extremely low, very low, low and moderate income households;
2. To expand production of and preserve affordable housing; and
3. To further the housing element of the local government comprehensive plan specific to affordable housing.

C. Fiscal years covered by the Plan: 2017-2018, 2018-2019 and 2019-2020

D. Governance: The SHIP Program is established in accordance with Section 420.907-9079, Florida Statutes and Chapter 67-37, Florida Administrative Code. Cities and Counties must be in compliance with these applicable statutes, rules and any additional requirements as established through the Legislative process.

E. Local Housing Partnership: The SHIP Program encourages building active partnerships between government, lending institutions, builders and developers, not-for-profit and community based housing providers and service organizations, providers of professional services related to affordable housing, advocates for low-income persons, real estate professionals, persons or entities that can provide housing or support services and lead agencies of the local continuums of care.

F. Leveraging: The Plan is intended to increase the availability of affordable residential units by combining local resources and cost saving measures into a local housing partnership and using public and private funds to reduce the cost of housing. SHIP funds may be leveraged with or used to supplement other Florida Housing Finance Corporation programs and to provide local match to obtain federal housing grants or programs.

G. Public Input: Public input was solicited through face to face meetings with housing providers, social service providers and local lenders and neighborhood associations. Public input was solicited through the local newspaper in the advertising of the Local Housing Assistance Plan and the Notice of Funding Availability.

H. Advertising and Outreach: SHIP funding availability shall be advertised in a newspaper of general circulation and periodicals serving ethnic and diverse neighborhoods, at least 30 days before the beginning of the application period. If no funding is available due to a waiting list, no notice of funding availability is required.

I. Waiting List and Priorities: A waiting list will be established when there are eligible applicants for strategies that no longer have funding available. Those households on the waiting list will be notified of their status. Applicants will be maintained in an order that is consistent with the time applications were submitted, as well as any established funding priorities as described in this Plan.

The priorities for funding described below apply to all strategies unless otherwise stated in the specific strategy:

The City will accept applications during the advertised application period, until all funds are expended for each strategy. Applications will be placed in order of receipt and separated by strategy. When funds are available for a particular strategy, the applicants from the waiting list will be contacted to update and/or complete an application for funding assistance. Applicants will receive assistance once they have provided all required documentation and have been determined eligible to receive funding. Once a list of eligible applicants is compiled for a particular strategy, applications will be awarded for assistance on a first-qualified, first-served basis.

For strategies providing Special Needs assistance, eligible applicants will be ranked giving first priority to households qualifying as Special Needs households to meet the minimum 20% set-aside for the funding year as listed below:

1. Homeowners with a developmental disability.
2. Households with household member with developmental disability.
3. Households with other disabilities and special needs, as defined by F.S. 420.0004
4. All other applicants that qualify.

After meeting the minimum 20% set-aside for Special Needs households for the funding year, remaining eligible applicants will be considered for assistance based upon a first-qualified, first-served basis.

- J. **Discrimination:** In accordance with the provisions of ss.760.20-760.37, it is unlawful to discriminate on the basis of race, color, religion, sex, national origin, age, handicap, or marital status in the award application process for eligible housing. Additionally, the City of Gainesville must comply with applicable local discrimination regulations in which there are no barriers to obtaining housing due to race, religion, color, age, sex, familial status, national origin, handicap, sexual orientation or gender identity.
- K. **Support Services and Counseling:** The City of Gainesville will administer a Housing Counseling Program designed to promote homeownership opportunities and improve access to affordable housing. Funds will be utilized for housing counseling activities carried out by staff that have appropriate training and are certified to provide the training, including equipment, materials and supplies related to housing counseling activities.

The Housing Counseling Program assists any person who wants to rent housing and/or purchase housing to obtain the counseling and resources needed for seeking, financing, maintaining, renting, or owning a home to become successful homeowners and responsible renters. The Housing Counseling Program offers support services from various sources, but is not limited to: Homeownership Counseling (Pre and Post), Credit Counseling, Foreclosure Prevention Counseling, Tenant Counseling and other general housing counseling services based on household need. The Housing Counseling Program also provides one-on-one counseling to applicants, as needed. In addition, group seminars are conducted to provide general consumer information on the home purchase process, financing options, credit repair, financial literacy and other topics that help meet the goals of homeownership to assist clients with making informed and reasonable decisions regarding their housing needs.

The City of Gainesville may also partner with other housing and community based housing providers and service organizations to provide housing counseling support services, as applicable based upon on availability of resources.

- L. Purchase Price Limits: The sales price or value of new or existing eligible housing may not exceed 90% of the average area purchase price in the statistical area in which the eligible housing is located. Such average area purchase price may be that calculated for any 12-month period beginning not earlier than the fourth calendar year prior to the year in which the award occurs. The sales price of new and existing units, which can be lower but may not exceed 90% of the median area purchase price established by the U.S. Treasury Department or as described above.

The methodology used is:

X	U.S. Treasury Department
	Local HFA Numbers

The City of Gainesville has elected to use the HUD Purchase Price Limits for the Alachua County/Gainesville Metropolitan Statistical Area. The Purchase Price Limits are updated annually by HUD and posted on the HUD Exchange website at: <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value>.

- M. Income Limits, Rent Limits and Affordability: The Income and Rent Limits used in the SHIP Program are updated annually by the Department of Housing and Urban Development and posted at www.floridahousing.org.

Affordable means that monthly rents or mortgage payments including taxes and insurance do not exceed 30 percent of that amount which represents the percentage of the median annual gross income for the households as indicated in Sections 420.9071, F.S. However, it is not the intent to limit an individual household's ability to devote more than 30% of its income for housing, and housing for which a household devotes more than 30% of its income shall be deemed Affordable if the first institutional mortgage lender is satisfied that the household can afford mortgage payments in excess of the 30% benchmark and in the case of rental housing does not exceed those rental limits adjusted for bedroom size.

- N. Welfare Transition Program: Should an eligible sponsor be used, a qualification system and selection criteria for applications for Awards to eligible sponsors shall be developed, which includes a description that demonstrates how eligible sponsors that employ personnel from the Welfare Transition Program will be given preference in the selection process.
- O. Monitoring and First Right of Refusal: In the case of rental housing, the staff and any entity that has administrative authority for implementing the local housing assistance plan assisting rental developments shall periodically monitor and determine tenant eligibility or, to the extent another governmental entity provides the same monitoring and determination, a municipality, county or local housing financing authority may rely on such monitoring and determination of tenant eligibility. However, any loan or grant in the original amount of \$3,000 or less shall not be subject to these annual monitoring and determination of tenant eligibility requirements. Tenant eligibility will be monitored annually for no less than 15 years or the term of assistance whichever is longer unless as specified above.

Eligible sponsors that offer rental housing for sale before 15 years or that have remaining mortgages funded under this program must give a first right of refusal to eligible nonprofit organizations for purchase at the current market value for continued occupancy by eligible persons.

- P. Administrative Budget: A line-item budget of proposed Administrative Expenditures is attached as Exhibit A. The City of Gainesville finds that the moneys deposited in the local housing assistance trust fund shall be used to administer and implement the local housing assistance plan.

Section 420.9075 Florida Statute and Chapter 67-37, Florida Administrative Code, states: "A county or an eligible municipality may not exceed the 5 percent limitation on administrative costs, unless its governing body finds, by resolution, that 5 percent of the local housing distribution plus 5 percent of program income is insufficient to adequately pay the necessary costs of administering the local housing assistance plan."

Section 420.9075 Florida Statute and Chapter 67-37, Florida Administrative Code, further states: "The cost of administering the program may not exceed 10 percent of the local housing distribution plus 5 percent of program income deposited into the trust fund, except that small counties, as defined in s. 120.52(17), and eligible municipalities receiving a local housing distribution of up to \$350,000 may use up to 10 percent of program income for administrative costs."

The applicable local jurisdiction has adopted the above findings in the resolution attached as Exhibit E.

- Q. Program Administration: Administration of the local housing assistance plan will be wholly performed and maintained by the City of Gainesville.
- R. Project Delivery Costs: Project delivery costs will be granted to the recipient. These project delivery costs are costs incurred for implementing and carrying out eligible program activities. The project delivery costs also cover services that are necessary for successful completion of the activity including, but are not limited to: title searches, home inspections, lead based paint inspections, credit reporting, engineering plans, surveys, appraisals and recordation fees. These project delivery costs are actual amounts of services and deliverables. In cases where an activity is outsourced to a third party, the project delivery cost will be included as part of the contractual services.
- S. Essential Service Personnel Definition: For purpose of SHIP funding, the City of Gainesville defines essential services personnel as: any household earning up to 120 % of the Gainesville Metropolitan Statistical Area median income; and employed as teachers and educators; police, fire and code enforcement personnel; government employees; military personnel; health care personnel; or skilled building trades.
- T. The City of Gainesville shall, through implementation of the various housing strategies, encourage and support green, storm resistant, and low maintenance construction, including energy efficient features that are economically sound with respect to the goals and beneficiaries of each strategy. When economically feasible, the City of Gainesville will utilize the following Green Building requirements on housing rehabilitation and new construction projects:

1. Low or No-VOC paint for all interior walls (Low-VOC means 50 grams per liter or less for flat paint; 150 grams per liter or less for non-flat paint);
2. Low-flow water fixtures in bathrooms—WaterSense labeled products or the following specifications:
 - a. Toilets: 1.6 gallons/flush or less,
 - b. Faucets: 1.5 gallons/minute or less,
 - c. Showerheads: 2.2 gallons/minute or less;
3. Energy Star qualified refrigerator;
4. Energy Star qualified dishwasher, if provided;
5. Energy Star qualified washing machine, if provided in units;
6. Energy Star qualified exhaust fans in all bathrooms; and
7. Air conditioning: Minimum SEER of 14. Packaged units are allowed in studios and one bedroom units with a minimum of 11.7 SEER.

These products and processes may be amended if federal, state and/or local regulations require a more prescriptive list.

- U. Describe efforts to meet the 20% Special Needs set-aside: The Special Needs set-aside will be addressed through the homeowner rehabilitation and rental assistance housing strategies with particular attention given to the Homeowner Rehabilitation Program to provide the opportunity for owner occupants to remain independent in their homes and maintain homeownership.

Additionally, the City of Gainesville will continue to support partnerships with organizations that focus on serving the special needs population as defined by F.S. 420.0004 and F.S. 393.063. The City of Gainesville will coordinate with these partners as referring agencies to applicable SHIP Program strategies.

- V. Describe efforts to reduce homelessness: The City of Gainesville collaborates with Alachua County, the local Continuum of Care (CoC) and other homeless service organizations through active participation in discussions, trainings and other efforts to address homelessness in the community. The City of Gainesville's goal is to continue to participate and collaborate in these planning efforts to address homelessness in the community; and to assist homeless individuals and families to obtain access to stable housing and adequate referrals to resources and assistance.

Section II. LHAP Strategies:

A. HOMEOWNER REHABILITATION	Code 3
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- a. Summary of Strategy: SHIP funds will be awarded to households in need of repairs to correct code violations, health and safety issues, electrical, plumbing, roofing, windows, structural items and accessibility. Homes eligible under this program must be financially feasible to rehabilitate as determined by the City of Gainesville. Eligible costs may include construction costs and related project soft costs (e.g., architectural, engineering, related professional services such as credit reports, recordation and filing fees, appraisal fees, lead based paint inspections, building permits, builders fees).
- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low and Low
- d. Maximum award: \$50,000
- e. Terms:
1. Loan/deferred loan/grant: Deferred loan secured by a recorded mortgage and promissory note.
 2. Interest Rate: 0%
 3. Years in Loan Term: 10 years
 4. Forgiveness: Loan is forgiven after 10 year term
 5. Repayment: N/A
 6. Default: The loan will be determined to be in default if any of the following occurs during the Loan term: sale, transfer, or conveyance of property; or failure to occupy the home as primary residence. If any of these occur during the term of the Loan, the outstanding balance will be due and payable.

In the event that a homeowner may need to refinance and/or sell his/her home for a variety of reasons including financial difficulties, job transfers, divorce, death, health related issues and other occurrences that are a normal part of family life. Under these circumstances, a subordination and/or forgiveness of the loan may be eligible as outlined below:

A subordination of a loan for the purpose of refinancing an existing debt that is in the superior lien position to the loan may be allowed for situations such as, to obtain a lower interest rate, debt consolidation, to make home improvements or improvements to the property, educational reasons, payment of medical expenses, and illness. No cash out to the homeowner. However, when a hardship exists such as, divorce, death, and health related issues, an exception may be considered. A subordination of the loan will only be approved in accordance with the guidelines of the City's Loan Subordination Policy, as amended.

Forgiveness of the loan will only be approved in accordance with the guidelines of the City's Loan Forgiveness Policy, as amended. If a homeowner needs to sale his/her home due to a hardship such as divorce, death, and/or health related issues, may be eligible to request a loan forgiveness for all or a portion of the loan. Staff will work with the existing lenders and/or legal representatives to recapture any funds available to satisfy the lien, which may vary under by request.

If a property is foreclosed on by a superior mortgage holder, the City will make an effort to recapture funds through the legal process; if it is determined that sufficient funding may be available to justify pursuing repayment. If sufficient funding is available, recapture of the loan will be repaid to the SHIP Program and/other leveraged program funding based on the percentage of the funding invested in the project, as applicable.

The program restrictions on the property shall terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD.

- f. Recipient Selection Criteria: The first priority special needs funds must be to serve persons with developmental disabilities as defined in s. 393.063, with an emphasis on home modifications, including technological enhancements and devices, which will allow homeowners to remain independent in their own homes and maintain their homeownership. Applications for assistance under this program will be reviewed and approved based on a first-qualified, first-served basis with the following priorities:

1. Homeowners with a developmental disability.
2. Households with household member with developmental disability.
3. Households with other disabilities and special needs, as defined by F.S. 420.0004
4. All other applicants that qualify.

After serving enough Special Needs households to meet the 20% set-aside for the funding year, all applicants determined to be eligible will be considered for Homeowner Rehabilitation Program assistance based upon a first-qualified, first-served basis.

- g. Sponsor/Developer Selection Criteria: N/A

- h. Additional Information:

Mobile homes are not eligible to receive assistance from this program.

Homeowner must have owned and occupied the property as their primary residence for at least five (5) years prior to applying for program assistance.

In the event that the owner(s) executing the mortgage and note are deceased during the 10-year term, the loan shall be considered satisfied and will no longer constitute a lien against the property.

B. HOUSE REPLACEMENT**Code 4**

- a. Summary of Strategy: The House Replacement Program will address housing units that are infeasible to rehabilitate due to the existing major health and safety violations, and the exorbitant cost of repairs required to make these dwellings meet the minimum housing code requirements. Funding for this program will be reserved for homeowners who applied to the Homeowner Rehabilitation Program for assistance and their homes were subsequently determined to be infeasible to rehabilitate. The House Replacement program will assist a homeowner with demolishing the existing home and rebuilding a new home on the same site or other equivalent site. The house plans will be established by the City of Gainesville. Eligible costs include construction costs and related project soft costs (e.g., architectural, engineering, related professional services such as credit reports, recordation and filing fees, appraisal fees, survey fees, lead based paint inspections, building permits, builders fees). Mobile homes are not eligible to receive assistance from this program.
- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low and Low
- d. Maximum award: \$125,000
- e. Terms:
1. Loan/deferred loan/grant: Deferred loan secured by a recorded mortgage and promissory note.
 2. Interest Rate: 0%
 3. Years in Loan Term: 20 years
 4. Forgiveness: Loan is forgiven after 20 year term
 5. Repayment: N/A
 6. Default: The loan will be determined to be in default if any of the following occurs during the Loan term: sale, transfer, or conveyance of property; or failure to occupy the home as primary residence. If any of these occur during the term of the Loan, the outstanding balance will be due and payable.

In the event that a homeowner may need to refinance and/or sell his/her home for a variety of reasons including financial difficulties, job transfers, divorce, death, health related issues and other occurrences that are a normal part of family life. Under these circumstances, a subordination and/or forgiveness of the loan may be eligible as outlined below:

A subordination of a loan for the purpose of refinancing an existing debt that is in the superior lien position to the loan may be allowed for situations such as, to obtain a lower interest rate, debt consolidation, to make home improvements or improvements to the property, educational reasons, payment of medical expenses, and illness. No cash out to the homeowner.

However, when a hardship exists such as, divorce, death, and health related issues, an exception may be considered. A subordination of the loan will only be approved in accordance with the guidelines of the City's Loan Subordination Policy, as amended.

Forgiveness of the loan will only be approved in accordance with the guidelines of the City's Loan Forgiveness Policy, as amended. If a homeowner needs to sale his/her home due to a hardship such as divorce, death, and/or health related issues, may be eligible to request a loan forgiveness for all or a portion of the loan. Staff will work with the existing lenders and/or legal representatives to recapture any funds available to satisfy the lien, which may vary under by request.

If a property is foreclosed on by a superior mortgage holder, the City will make an effort to recapture funds through the legal process; if it is determined that sufficient funding may be available to justify pursuing repayment. If sufficient funding is available, recapture of the loan will be repaid to the SHIP Program and/other leveraged program funding based on the percentage of the funding invested in the project, as applicable.

The program restrictions on the property shall terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD.

- f. Recipient Selection Criteria: Applications for assistance under this program will be transferred from the Homeowner Rehabilitation Program for applicants who applied for assistance from the Homeowner Rehabilitation Program and their homes were subsequently determined to be infeasible to rehabilitate, based upon available resources.
- g. Sponsor/Developer Selection Criteria: N/A
- h. Additional Information:
In the event that the owner(s) executing the mortgage and note are deceased during the 20-year term, the loan shall be considered satisfied and will no longer constitute a lien against the property.

C. ROOF REPLACEMENT	Code 3
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- a. Summary of Strategy: The purpose of the Roof Program is to prevent further damage to homes, and reduce rehabilitation costs of homes by repairing or replacing deteriorated or leaking roofs. Eligible repairs are limited to the roof of the structure on the home. Eligible costs include construction costs and related project soft costs (e.g., architectural, engineering, related professional services such as credit reports, recordation and filing fees, appraisal fees, lead based paint inspections, building permits, builders fees). Mobile homes are not eligible to receive assistance from this program.
- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low and Low
- d. Maximum award: \$15,000

e. Terms:

1. Loan/deferred loan/grant: Deferred loan secured by a recorded mortgage and promissory note.
2. Interest Rate: 0%
3. Years in Loan Term: 5 years
4. Forgiveness: Loan is forgiven after 5 year term
5. Repayment: N/A
6. Default: The loan will be determined to be in default if any of the following occurs during the Loan term: sale, transfer, or conveyance of property; or failure to occupy the home as primary residence. If any of these occur during the term of the Loan, the outstanding balance will be due and payable.

In the event that a homeowner may need to refinance and/or sell his/her home for a variety of reasons including financial difficulties, job transfers, divorce, death, health related issues and other occurrences that are a normal part of family life. Under these circumstances, a subordination and/or forgiveness of the loan may be eligible as outlined below:

A subordination of a loan for the purpose of refinancing an existing debt that is in the superior lien position to the loan may be allowed for situations such as, to obtain a lower interest rate, debt consolidation, to make home improvements or improvements to the property, educational reasons, payment of medical expenses, and illness. No cash out to the homeowner. However, when a hardship exists such as, divorce, death, and health related issues, an exception may be considered. A subordination of the loan will only be approved in accordance with the guidelines of the City's Loan Subordination Policy, as amended.

Forgiveness of the loan will only be approved in accordance with the guidelines of the City's Loan Forgiveness Policy, as amended. If a homeowner needs to sale his/her home due to a hardship such as divorce, death, and/or health related issues, may be eligible to request a loan forgiveness for all or a portion of the loan. Staff will work with the existing lenders and/or legal representatives to recapture any funds available to satisfy the lien, which may vary under by request.

If a property is foreclosed on by a superior mortgage holder, the City will make an effort to recapture funds through the legal process; if it is determined that sufficient funding may be available to justify pursuing repayment. If sufficient funding is available, recapture of the loan will be repaid to the SHIP Program and/other leveraged program funding based on the percentage of the funding invested in the project, as applicable.

The program restrictions on the property shall terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD.

- f. Recipient Selection Criteria: Applications for assistance under this program will be reviewed and approved based on a first-qualified, first-served basis.
- g. Sponsor/Developer Selection Criteria: N/A
- h. Additional Information:
In the event that the owner(s) executing the mortgage and note are deceased during the 10-year term, the loan shall be considered satisfied and will no longer constitute a lien against the property.

D. DOWNPAYMENT ASSISTANCE	Code 1, 2
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- a. Summary of the Strategy: The Downpayment Assistance Program will provide downpayment and/or closing cost assistance to eligible first-time homebuyers with the purchase of eligible homes. A first-time homebuyer is an individual who meets any of the following criteria:
 - An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This includes a spouse (if either meets the above test, they are considered first-time homebuyers).
 - A single parent who has only owned with a former spouse while married.
 - An individual who is a displaced homemaker and has only owned with a spouse.
 - An individual who has only owned a principal residence not permanently affixed to a permanent foundation in accordance with applicable regulations.
 - An individual who has only owned a property that was not in compliance with state, local or model building codes and which cannot be brought into compliance for less than the cost of constructing a permanent structure.

Additionally, the program may provide assistance for minor repairs of eligible existing homes purchased. Lender guidelines have been established to ensure that households are not cost burdened by housing payments after receiving assistance. Mobile homes are not eligible to receive assistance from this program. Eligible homes include existing homes and/or newly constructed homes as outlined below:

- 1. Existing Homes with minor repairs:
This program may address minor repairs up to \$2,000 as identified by a SHIP certified home inspection report for eligible homes purchased. The minor repairs must be financially feasible to address as determined by the City of Gainesville. The specified scope of eligible minor repairs may include, but are not limited to the cost of labor and materials for items such as broken electrical outlets/fixtures, broken window panes, HVAC maintenance, and battery replacement for smoke/carbon monoxide detectors:

A maximum of \$2,000 will be available to assist with minor repairs of the property; and a maximum of \$8,000 will be available to assist with downpayment and/or closing cost assistance for total maximum assistance of \$10,000.
- 2. An Existing home and/or Newly Constructed Home with no repairs is defined as:

- A home that is being newly constructed involving a construction agreement between the eligible homebuyer and a licensed general contractor; or
- A newly constructed home that has obtained a certificate of occupancy within the 12-month period preceding the purchase and sale contract; or
- A newly constructed home that was built as a model home and has never been occupied; and/or
- An existing home with no repairs identified by a SHIP certified home inspection report.
- Homes purchased through the FHA 203K Loan Program.

A maximum of up to \$10,000 will be available to assist with downpayment and/or closing cost assistance. Minor repairs are not eligible for newly constructed homes or FHA 203K Loan Program funded homes.

- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low, Low and Moderate
- d. Maximum award: \$10,000
- e. Terms:
 - 1. Loan/deferred loan/grant: Deferred loan secured by a recorded mortgage and promissory note.
 - 2. Interest Rate: 0%
 - 3. Years in Loan Term: 5 years
 - 4. Forgiveness: Loan is forgiven after 5 year term
 - 5. Repayment: N/A
 - 6. Default: The loan will be determined to be in default if any of the following occurs during the Loan term: sale, transfer, or conveyance of property; or failure to occupy the home as primary residence. If any of these occur during the term of the Loan, the outstanding balance will be due and payable.

In the event that a homeowner may need to refinance and/or sell his/her home for a variety of reasons including financial difficulties, job transfers, divorce, death, health related issues and other occurrences that are a normal part of family life. Under these circumstances, a subordination and/or forgiveness of the loan may be eligible as outlined below:

A subordination of a loan for the purpose of refinancing an existing debt that is in the superior lien position to the loan may be allowed for situations such as, to obtain a lower interest rate, debt consolidation, to make home improvements or improvements to the property, educational reasons, payment of medical expenses, and illness. No cash out to the homeowner. However, when a hardship exists such as, divorce, death, and health related issues, an exception may be considered. A subordination of the loan will only be approved in accordance with the guidelines of the City's Loan Subordination Policy, as amended.

Forgiveness of the loan will only be approved in accordance with the guidelines of the City's Loan Forgiveness Policy, as amended. If a homeowner needs to sale his/her home due to a hardship such as divorce, death, and/or health related issues, may be eligible to request a loan forgiveness for all or a portion of the loan. Staff will work with the existing lenders and/or legal representatives to recapture any funds available to satisfy the lien, which may vary under by request.

If a property is foreclosed on by a superior mortgage holder, the City will make an effort to recapture funds through the legal process; if it is determined that sufficient funding may be available to justify pursuing repayment. If sufficient funding is available, recapture of the loan will be repaid to the SHIP Program and/other leveraged program funding based on the percentage of the funding invested in the project, as applicable.

The program restrictions on the property shall terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD.

- f. Recipient Selection Criteria: Applications for assistance under this program will be reviewed and approved on a first-qualified, first-served basis, following receipt of an application, income qualification, lender approval of mortgage, completion of a City approved homeownership training program to determine applicant eligibility.
- g. Sponsor/Developer Selection Criteria: N/A
- h. Additional Information: The recipient must pay a minimum of 2% contribution towards the sales price of the home. Additional homebuyer contribution may be required by the Lender. Only the amount of SHIP subsidy required to close will be awarded. The home inspection must be performed by a City SHIP certified home inspector.

The minor repairs must be performed by a City approved vendor and/or contractor. The funds approved for the minor repairs are paid directly to the vendor and/or contractor upon satisfactory completion of the specified scope of work as determined by the City of Gainesville. The repairs must begin within the timeframe specified by the scope of work after closing and must be completed within 60 days of commencement of the work.

In the event that the owner(s) executing the mortgage and note are deceased during the 5-year term, the loan shall be considered satisfied and will no longer constitute a lien against the property.

E. INFILL HOUSING DEVELOPMENT	Code 10
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- a. Summary of the Strategy: The purpose of the Infill Housing Development Program is to provide affordable homeownership opportunities for eligible homebuyers; and to stabilize neighborhoods through the development of new affordable housing. The new housing units may be constructed on infill lots within the City. This program will address the need to provide new affordable homes to eligible homebuyers.

Funds will be used to subsidize the construction of a new home. The house plans must be approved by the City of Gainesville. Eligible costs include construction costs and related project soft costs (e.g., architectural, engineering, appraisals, surveys, building permits and recordation fees).

- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low, Low and Moderate
- d. Maximum award: \$25,000
- e. Terms:
 - 1. Loan/deferred loan/grant: Deferred loan secured by a recorded mortgage and promissory note.
 - 2. Interest Rate: 0%
 - 3. Years in Loan Term: 10 years
 - 4. Forgiveness: Loan is forgiven after 10 year term
 - 5. Repayment: N/A
 - 6. Default: The loan will be determined to be in default if any of the following occurs during the Loan term: sale, transfer, or conveyance of property; or failure to occupy the home as primary residence. If any of these occur during the term of the Loan, the outstanding balance will be due and payable.

In the event that a homeowner may need to refinance and/or sell his/her home for a variety of reasons including financial difficulties, job transfers, divorce, death, health related issues and other occurrences that are a normal part of family life. Under these circumstances, a subordination and/or forgiveness of the loan may be eligible as outlined below:

A subordination of a loan for the purpose of refinancing an existing debt that is in the superior lien position to the loan may be allowed for situations such as, to obtain a lower interest rate, debt consolidation, to make home improvements or improvements to the property, educational reasons, payment of medical expenses, and illness. No cash out to the homeowner. However, when a hardship exists such as, divorce, death, and health related issues, an exception may be considered. A subordination of the loan will only be approved in accordance with the guidelines of the City's Loan Subordination Policy, as amended.

Forgiveness of the loan will only be approved in accordance with the guidelines of the City's Loan Forgiveness Policy, as amended. If a homeowner needs to sale his/her home due to a hardship such as divorce, death, and/or health related issues, may be eligible to request a loan forgiveness for all or a portion of the loan. Staff will work with the existing lenders and/or legal representatives to recapture any funds available to satisfy the lien, which may vary under by request.

If a property is foreclosed on by a superior mortgage holder, the City will make an effort to recapture funds through the legal process; if it is determined that sufficient funding may be available to justify pursuing repayment. If sufficient funding is available, recapture of the loan will be repaid to the SHIP Program and/or other leveraged program funding based on the percentage of the funding invested in the project, as applicable.

The program restrictions on the property shall terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD.

- f. Recipient Selection Criteria: Applications for assistance under this program will be reviewed and approved on a first-qualified, first-served basis, following receipt of an application, income qualification, lender approval of mortgage, completion of a City approved homeownership training program and other program criteria as required to determine applicant eligibility.
- g. Sponsor/Developer Selection Criteria: The City of Gainesville shall administer this program. The City may also leverage funding with other non-profit affordable housing developers to construct new homes on infill lots, as applicable.
- h. Additional Information:
In the event that the owner(s) executing the mortgage and note are deceased during the 10-year term, the loan shall be considered satisfied and will no longer constitute a lien against the property.

F. MORTGAGE FORECLOSURE INTERVENTION	Code 7
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- a. Summary of the Strategy: The Mortgage Foreclosure Intervention Program provides assistance to eligible homeowners to prevent foreclosure and retain homeownership of their homes. Funds will be provided to eligible homeowners to assist with bringing their mortgage payments current. Eligible expenses include, but are not limited to: delinquent mortgage payments (principal, interest, taxes and insurance), attorney’s fees, late fees and other customary fees, if applicable. Mobile homes are eligible if the residential unit meets the standards of Chapter 553, Florida Statutes for homeownership. Owner-financed and/or private mortgage loans are not eligible for assistance.
- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low, Low and Moderate
- d. Maximum award: \$5,000
- e. Terms:
 - 1. Loan/deferred loan/grant: Funds will be awarded as a grant with no recapture terms.
 - 2. Interest Rate: 0%
 - 3. Years in Loan Term: N/A

- 4. Forgiveness: N/A
- 5. Repayment: N/A
- 6. Default: N/A
- f. Recipient Selection Criteria: Applications for assistance under this program will be reviewed and approved on a first-come, first-qualified, first-serve basis, following receipt of an application, income qualification, proof of ownership, proof of mortgage arrearage, evidence of hardship, approval of a mortgage loan workout plan with a lender, if applicable, receive foreclosure counseling; and other program criteria as required to determine applicant eligibility.
- g. Sponsor/Developer Selection Criteria: N/A
- h. Additional Information: N/A

G. DISASTER MITIGATION	Code 5
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- a. Summary of Strategy: Funds will be awarded to applicants in need of home repairs directly caused by a disaster that is declared by an Executive Order of the President or Governor. SHIP funds will be used to leverage available federal, state and/or insurance funds to provide assistance to eligible households for the purpose of repairing eligible housing. Mobile homes are not eligible for this program. Use of funds for repairs will be prioritized as follows:
 - 1. Immediate threats to health and life safety (i.e., sewage, damaged windows, tree/debris removal, roofing) in cases where the home is still habitable.
 - 2. Imminent residual damage to the home (such as damage caused by a leaking roof) in cases where the home is still habitable.
 - 3. Repairs necessary to make the home habitable.
 - 4. Repairs to mitigate dangerous situations (i.e., exposed wires)
 - 5. Relocation expenses such as security deposit and rental assistance for eligible recipients who have been displaced from their homes due to the declared disaster.
- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low, Low, Moderate
- d. Maximum award: \$5,000
- e. Terms:
 - 1. Loan/grant: Funds will be awarded as a grant with no recapture terms.
 - 2. Interest Rate: 0%
 - 3. Years in Loan Term: N/A
 - 4. Forgiveness: N/A

- 5. Repayment: N/A
- 6. Default: N/A

- f. Recipient Selection Criteria: Applicants will be assisted on a first-qualified, first-served basis with the following additional requirements:
 - 1. Must provide proof of ownership
 - 2. Must provide proof of homeowner’s insurance
 - 3. Must file for and use proceeds from homeowners insurance as first option

- g. Sponsor/Developer Selection Criteria: N/A

- h. Additional Information:

Funds for disaster mitigation will only be allocated from unencumbered funds or additional funds awarded through Florida Housing Finance Corporation for the declared disaster.

H. RENTAL DEVELOPMENT	Codes 14, 15, 21
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- a. Summary of Strategy: Funds will be awarded to developers of affordable rental units that are awarded construction financing through other state or federal housing programs (i.e., Low Income Housing Tax Credit Program, State Apartment Incentive Loan Program, etc.) to construct or rehabilitate affordable rental units. This funding is intended to be used as a local government contribution for rental development projects. For projects serving persons with special needs, as defined by 420.004 F.S., the minimum number of units required to participate in the program is 10 units. For all other projects, the minimum number of units is 50.
- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-low, Low and Moderate
- d. Maximum award: \$37,500 per project
- e. Terms:
 - 1. Loan/grant: Funds will be awarded as a deferred loan secured by a recorded mortgage and promissory note.
 - 2. Interest Rate: 0%
 - 3. Term: 15 years
 - 4. Forgiveness: Deferred loan is forgiven after 15 year term
 - 5. Repayment: Not required as long as loan is in good standing.

6. Default: For all awards, a default will be determined as: sale, transfer, or conveyance of property; conversion to another use; failure to maintain standards for compliance as required by any of the funding sources. If any of these occur, the outstanding balance will be due and payable.

If a property is foreclosed on by a superior mortgage holder, the City will make an effort to recapture funds through the legal process; if it is determined that sufficient funding may be available to justify pursuing repayment. If sufficient funding is available, recapture of the loan will be repaid to the SHIP Program and/or other leveraged program funding based on the percentage of the funding invested in the project, as applicable.

The program restrictions on the property shall terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD.

- f. Recipient Selection Criteria: All applicants for residence in a SHIP-assisted unit must meet income qualifications of the program, as determined and reported by the developer's management company and/or other managing entity for the development.
- g. Sponsor/Developer Selection Criteria: Developers will apply to the City of Gainesville through an application process that is open year round. The application will require proof of developer experience in providing affordable rental housing, proof of financial capacity, proof of property management experience, evidence of site control (or contract for sale) and proof of ability to proceed once all funding is closed. Other program criteria may apply to determine eligibility for a funding award. All housing unit design plans must comply with the City of Gainesville's Housing Element in the Comprehensive Plan.

The City of Gainesville reserves the right to select developments that meet all of the above requirements and:

1. Are located in areas of immediate need due to lack of available units; and/or
2. Propose to preserve and improve existing units.

All funding awards will be subject to closing on other funding sources.

- h. Additional Information: Developers will be required to meet compliance reporting requirements on the development necessary to meet the statutory requirements for monitoring of SHIP rental units.

I. RAPID REHOUSING RENTAL ASSISTANCE	Code 26
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- a. Summary of Strategy: SHIP funds will be awarded to eligible recipients who are in need of a rental subsidy to assist with obtaining a lease on a rental unit.

Eligible recipients must qualify as very-low income household with at least one adult who is person with special needs as defined in s. 420.004, or a person who is homeless as defined in s. 420.621 at the time of application. Rent subsidy assistance may include utility deposits, security deposits and payment of rent equal to no more than twelve (12) months.

- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low
- d. Maximum award: \$6,000
- e. Terms:
 - 1. Loan/grant: Funds will be awarded as a grant
 - 2. Interest Rate: N/A
 - 3. Term: N/A
 - 4. Forgiveness: N/A
 - 5. Repayment: N/A
 - 6. Default: N/A
- f. Recipient Selection Criteria: Eligible recipients must qualify as very-low income household with at least one adult who is person with special needs as defined in s. 420.004, or a person who is homeless as defined in s. 420.621 at the time of application.

 Additionally, applicants must be entered into the local Homeless Management Information System (HMIS) and assistance will be provided based upon priority ranking as established by the local Continuum of Care (CoC).
- g. Sponsor/Developer Selection Criteria: The Alachua County Department of Community Support Services will administer the City of Gainesville Rapid Rehousing Rental Assistance Program via an Interlocal Agreement between the City of Gainesville and Alachua County. Implementation of the Rapid Rehousing Rental Assistance Program is based upon funding availability.
- h. Additional Information: The recipient’s lease must be at least twelve (12) months. Case management will be provided by Alachua County Community Support Services Department Social Services Division or referred to community social service agencies. Collaboration with local Continuum of Care (CoC) lead agency, landlords and realtors will be fostered to provide monitoring and improve program efficiency and effectiveness.

J. EVICTION PREVENTION	Code 13
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- a. Summary of Strategy: SHIP funds will be awarded to eligible recipients who are in need of one-time payment assistance with rent payments that are in arrears.

Eviction prevention applies only to rental dwellings to prevent homelessness. Eligible recipients may seek assistance for rent payments in arrears that are equal to no more than six (6) months rent.

- b. Fiscal Years Covered: 2017-2018, 2018-2019 and 2019-2020
- c. Income Categories to be served: Very-Low and Low
- d. Maximum award: \$3,000
- e. Terms:
 - 1. Loan/grant: Funds will be awarded as a grant.
 - 2. Interest Rate: N/A
 - 3. Term: N/A
 - 4. Forgiveness: N/A
 - 5. Repayment: N/A
 - 6. Default/Recapture: N/A
- f. Recipient Selection Criteria: Applications for assistance under this program will be reviewed and approved based on a first-come, first-qualified, first-served basis.
- g. Sponsor/Developer Selection Criteria: The Alachua County Department of Community Support Services will administer the City of Gainesville Eviction Prevention Program via an Interlocal Agreement between the City of Gainesville and Alachua County. Implementation of the Eviction Prevention Program is based upon funding availability.
- h. Additional Information: The recipient's lease must be at least twelve (12) months. Case management will be provided by Alachua County Community Support Services Department Social Services Division or referred to community social service agencies. Collaboration with local Continuum of Care (CoC) lead agency, landlords and realtors will be fostered to provide monitoring and improve program efficiency and effectiveness.

III. LHAP Incentive Strategies:

The City of Gainesville offers several incentives as recommended by the SHIP Affordable Housing Advisory Committee (AHAC) and adopted by the Gainesville City Commission in efforts to encourage and facilitate development of affordable housing in the City of Gainesville.

The AHAC identifies ways to encourage affordable housing that are cost effective, environmentally sound, and supportive of broad community goals. The following incentives explicitly seek to link affordable housing with broad community values, such as environmental protection, energy efficiency, smart growth, mixed use, and infill development. As mandated by the SHIP Program, the AHAC considers eleven topics that could increase affordable housing in Gainesville. The AHAC also recognizes, however, that consideration of many of these topics also advances elements of good urban design and more sustainable, environmentally friendly development practices in general. The AHAC's goal is to integrate rather than isolate affordable housing, so that it becomes indistinguishable from market rate housing in contributing to the betterment of our citizens and community. The AHAC desires the provision of affordable housing to be integrated with, not isolated from, the wider goals and aspirations of our community, such as environmental protection, energy efficiency and smart growth.

There are several challenges associated with developing local government housing policy and affordable housing incentives. Given the current housing situation, and related constraints on public funding, the AHAC must consider the need to limit the burden on property owners and taxpayers. One means to reducing that burden is to find ways to use existing affordable housing resources more effectively. This is particularly important for very-low-income persons, because the private market often fails to accommodate their needs. However, many affordable units in our community are provided with little or no direct financial subsidy through small "mom and pop" rentals, and the City must consider how its policies affect the preservation and improvement of these units as well. Although considerable affordable housing subsidy is available for both, home ownership and rental programs, the federal home mortgage income tax deduction, the property tax homestead and Save Our Homes provisions provide a much larger public subsidy for all types of housing. Those larger subsidies, however, provide only limited help to moderate, low and very-low-income residents (and, in fact, may come at the detriment of renters). As a community, the City must ensure that working people and their families can reasonably afford housing costs without sacrificing other key expenditures (utilities, healthcare, food, etc.) or compromising safety or being forced to live unreasonably far from places of employment, schools and shopping (particularly in light of higher transportation costs).

Finally, while there is an understandable interest in direct and indirect subsidies, the AHAC also focused on ways in which all housing can be made more affordable by reducing the cost of government requirements—while still meeting the legitimate need for regulation to protect the public interest. The AHAC believe that there exist opportunities to make regulation clearer, simpler, and more environmentally friendly, while reducing the cost of development of new housing. There is a strong alignment between the potential for infill development (largely making better use of existing public infrastructure) and opportunities for quality housing development at all income levels. Beyond this report, the AHAC will seek to continue further study and dialogue on this subject. Pursuant to the AHAC's Local Housing Incentive Strategies Recommendation Report, the following is a list of the City of Gainesville affordable housing incentive strategies. These incentive strategies are intended to facilitate, encourage, preserve, and produce affordable housing and designed to assure safe, decent and affordable housing within the City of Gainesville:

A. **The processing of approvals of development orders or permits, as defined in s.163.3164 for affordable housing projects is expedited to a greater degree than other projects.**

Review Synopsis: The City's Housing and Community Development staff certifies as "Affordable Housing Projects" residential projects that are either, funded by SHIP, CDBG, HOME, State of Florida Low-Income Housing Tax Credits or associated programs; or built by nonprofit affordable housing providers such as Habitat for Humanity and Neighborhood Housing and Development Corporation.

The City expedites Affordable Housing Projects in the two ways listed below.

- The Building Department expedites the review and inspection of Affordable Housing Projects to a greater degree than other projects.
- The Planning Department offers the affordable housing concept review and approval process to help Affordable Housing Projects meet the State of Florida Low-Income Housing Tax Credit Program application requirements. The review process notifies applicants as to problems and objections pertaining to proposed developments. The money saved by developers through the reduced expenditures in the development of detailed engineered plans can result in the delivery of housing at a lower cost than it would have been without these savings.

Recommendation: Ongoing/Continue.

Board Action: Adopted.

B. Modification of impact fee requirements including reduction or waiver of fees and alternative methods of fee payment.

Review Synopsis: The City does not currently require the payment of impact fees for new development.

Recommendation: Not applicable.

Board Action: Adopted.

C. Allowance of flexibility in densities for affordable housing.

Review Synopsis: In some multiple-family zoning districts, the City currently allows developers to increase the density of a project, within specified limits, based on a point system. In this system, the City awards points for desired design and development features, including affordable housing.

Staff has identified several problems with this system including the fact that it does not define the term “affordable.” Although not codified, in the past, staff has usually defined affordable as monthly rent or mortgage payments, including taxes and insurance, not exceeding 30% of the median annual gross income for households in the Gainesville Metropolitan Area.

Another problem is that this system does not state the number or percentage of units that must be affordable for a project to earn the bonus points. According to staff, in the few instances when the City and a developer have agreed to use this provision, they have negotiated to determine the amount of affordable units needed to obtain the bonus points (in other words, how many units must be affordable to get the points).

The City permits developers of projects that earn enough density bonus points to build projects at a higher density than is otherwise allowed. With this incentive, the City intends to lower land costs and subsequently, lower per unit housing costs.

However, the City’s system of density bonuses, and its affordable housing density bonus in particular, are rarely used. There are probably several reasons for that fact, including the following:

- compared to market demand, most City residential zoning districts allow relatively high density by right; as a result, most residential projects are permitted their preferred density without having to utilize the density bonus system; and

- even in the City’s highest density zoning district, providing affordable housing would result in only a small density increase—less than 2 units per acre.

As an alternative, the City is in the process of adopting a Land Development Code (LDC) update that implements a new “Form Based” zoning over a portion of the City. Rather than a Density Bonus, the Form Based Code allows a Height Bonus for the provision of affordable housing. The City’s experiences over the last few years indicate that developers are more likely to utilize a height bonus than a density bonus. Additionally, the new Form Based Code clearly defines which units are affordable, how many units must be affordable for the project to qualify for a height bonus, and how much additional height the bonus can provide.

Recommendation: Update the Density Bonus Manual by the end of 2018. That update should clearly define which units are affordable (based on rent or mortgage payments, including taxes and insurance) and how many units must be affordable to earn a density bonus. Additionally, consider increasing the value (density bonus points) for providing affordable housing; and using a sliding scale where the number of points awarded increases (or decreases) as the number of affordable units provided increases (or decreases). As an alternative, explore restructuring the Density Bonus Manual to align more closely with the Form Based Code’s Height Bonus.

Board Action: Adopted.

D. Reservation of infrastructure capacity for housing for very-low income persons, low-income persons, and moderate-income persons.

Review Synopsis: The City plans ahead to ensure that there is adequate infrastructure capacity to accommodate all new development. Part of that planning includes extensive coordination with various Federal, State, Regional and County Agencies. At present, GRU maintains sufficient water and wastewater treatment capacity. Each development is required to demonstrate that it provides the minimum stormwater retention level of service through either on-site retention or a coordinated system.

For automobiles, nearly all roads in the City operate at or better than the adopted level of service. The Transportation Mobility Program Area covers a large portion of the City and allows for development, such as urban redevelopment and infill development, to occur along roads that operate below their adopted level of service. Although the City may permit the development, the exemption does not relieve the developer from various improvements stated in the Transportation Mobility Element of the Comprehensive Plan.

Recommendation: Continue to monitor current and projected infrastructure needs and capacity. Identify and utilize adequate funding sources to provide enough capacity to meet future housing needs.

Board Action: Adopted.

E. Allowance of affordable accessory residential units in residential zoning districts.

Review Synopsis: Accessory residential units (ARU) were historically an effective means to provide mixed-income housing widely dispersed throughout the City. ARUs can provide affordable housing at little government cost, in neighborhoods where it is otherwise costly or impractical to create new affordable housing. ARUs can also generate a revenue stream to existing homeowners, making their home ownership more affordable and funding better property maintenance.

Although the City’s LDC does not allow new ARUs in single-family residential zoning districts, some ARUs currently exist in several of the City’s older single-family residential neighborhoods. Generally classified as legal non-conformities, the City Code allows those units to remain, but not expand.

In other words, they are “grandfathered in.” Because ARUs are difficult to track and document, enforcement of many of these regulations can be difficult.

By comparison, in the unincorporated part of Alachua County, the County does allow “Accessory Living Units” in all single-family residential zoning districts. Even in the City, ARUs are permitted where single-family units are built within multiple-family zoning districts.

Many Gainesville residents have major concerns about the impacts of ARUs on neighborhood quality of life. Those concerns are greatest in the neighborhoods close to the University of Florida, where many anticipate that the demand for ARUs is the highest. The conversion of owner occupied units to rental units has already had a large negative impact on many aspects of these neighborhoods. As a result, residents have coordinated to create a vocal and well-organized opposition to any attempts to expand allowances for ARUs.

Recommendation: Ongoing/Continue.

Board Action: Adopted.

F. Reduction of parking and setback requirements for affordable housing.

Review Synopsis: Future Land Use Element Policy 1.2.4 of the City’s Comprehensive Plan allows for reduced parking requirements, where appropriate. In instances where analysis demonstrates that a proposed use will generate less parking than the minimum required by City ordinances, a City process allows for the reduction of required parking spaces. The City’s current parking regulations require fewer parking spaces for low- and moderate-income housing. City code currently requires one parking space per bedroom for market rate multiple-family housing.

Recommendation: Ongoing/Continue.

Board Action: Adopted.

G. Allowance of flexible lot configurations, including zero lot line configurations, for affordable housing.

Review Synopsis: Zero lot line developments have no required setbacks on one or more sides. Consequently, they allow the use of a greater percentage of the lot. As a result, the allowance of zero lot line developments in appropriate locations can lower overall housing costs by reducing land costs. Additional cost savings in subdivision and building design can also be gained through the *Cluster Subdivision Ordinance*, found in *Section 30-190 of the LDC*.

Recommendation: Ongoing/Continue.

Board Action: Adopted.

H. Modification of street requirements for affordable housing.

Review Synopsis: The City’s street requirements provide flexibility in regards to width and construction techniques. Many older neighborhoods have thrived with narrower street widths, even including on-street parking and two-way traffic. Developers are encouraged to select alternative street specifications (including reductions in pavement widths) for all residential development, to reduce construction costs while benefitting the environment. Flexibility exists for right of way widths, pavement widths, turn around dimensions, intersection curb radii, reduced curb and gutter requirements, etc. Modified street requirements, can reduce construction costs for all housing, including affordable housing.

Recommendation: Flexibility currently exists within the Design Manual and Green Book guidelines for addressing modified street requirements for affordable housing.

Board Action: Adopted.

I. Establishment of a process by which the City considers before adoption policies, procedures, ordinances, regulations or plan provisions that increase in the cost of housing.

Review Synopsis: The City has implemented an ongoing review of local policies, ordinances, regulations and comprehensive plan provisions that affect the cost of housing. Through this process, the City reviews new regulations to determine their potential impact on affordable housing. When appropriate and feasible, the City mitigates for negative impacts. As part of this process, the City reviews and evaluates zoning and other housing regulations to ensure that they do not limit housing opportunities for lower-income groups within the City. Petitions that regulate land use are required to include a fiscal impact statement regarding the impact of proposed development on affordable housing in the City.

Recommendation: Ongoing/Continue.

Board Action: Adopted.

J. Preparation of an inventory of locally owned public lands suitable for affordable housing.

Review Synopsis: The City's Public Works Department maintains an inventory of City-owned lands available for affordable housing. Public Works routinely shares that inventory with various city departments and with other governmental and nonprofit agencies that provide affordable housing.

Recommendation: Ongoing.

Board Action: Adopted.

K. Support of affordable housing development near transportation hubs and major employment centers and mixed-use developments.

Review Synopsis: The following objective and policies of the Future Land Use Element of the City's Comprehensive Plan encourage, support or require affordable housing near mixed use and employment centers:

- Objective 1.4
- Policy 1.4.1
- Policy 1.5.7
- Policy 4.1.4
- Policy 4.3.4g.6 (Plum Creek)
- Policy 4.3.6a.4 (Butler Development PUD)

Additionally, review of the City's Future Land Use and Zoning Maps indicate that residential zoning often is located near bus routes, major roads, mixed use areas and employment centers.

Recommendation: Ongoing.

Board Action: Adopted.

L. Additional Recommendations

Other affordable housing incentives identified by the advisory committee.

Subsidizing Water and Wastewater Utility Connection Fees for New Affordable Housing: Connection fees are a significant portion of the cost of new development, including residential development. This is particularly relevant to small, local, non-profit organizations that build new affordable housing.

These fees are an important part of GRU's budget. The City has adopted the philosophy that, to some extent, new growth should pay for itself, rather than existing rate-payers subsidizing the entire cost of serving that growth. Additionally, certain bond covenants require the City to collect connection fees for repayment. For those reasons, the City cannot simply waive the fees for affordable housing projects.

The City, however, can use other funding sources to subsidize at least a portion of the fees for projects that meet certain criteria. If the City chose to subsidize those fees, further study would be required to identify those funding sources. Funding options include, but are not limited to, State and Federal programs, surcharges on connection fees for market rate projects, and the General Fund.

Additionally, the City would need to establish criteria used to determine which projects to subsidize. As with determining the funding sources, further study would be required to identify those criteria. To limit the initial budget impacts, the City generally designs such criteria to include only specific, limited projects (e.g., nonprofit organizations that build new, affordable, single-family houses). The City does this with the understanding that, if warranted, it can amend the criteria in the future.

Recommendation: Consider studying possible funding sources and criteria to help subsidize the costs of connection fees for nonprofit organizations that build new, affordable, single-family houses.

IV. EXHIBITS:

- A. Administrative Budget for each fiscal year covered in the Plan.
- B. Timeline for Estimated Encumbrance and Expenditure.
- C. Housing Delivery Goals Chart (HDGC) For Each Fiscal Year Covered in the plan.
- D. Signed LHAP Certification.
- E. Signed, dated, witnessed or attested adopting resolution.
- F. Ordinance: (If changed from the original creating ordinance).
- G. Interlocal Agreement

EXHIBIT A

ADMINISTRATIVE BUDGET

<u>Fiscal Year 2017/2018</u>	
Salaries and Benefits	\$ <u>70,000</u>
Office Supplies and Equipment	\$ <u>7,000</u>
Travel Per Diem Workshops, etc.	\$ <u>1,500</u>
Advertising	\$ <u>3,000</u>
Total	\$ <u>81,500</u>
<u>Fiscal Year 2018/2019</u>	
Salaries and Benefits	\$ <u>70,000</u>
Office Supplies and Equipment	\$ <u>7,000</u>
Travel Per Diem Workshops, etc.	\$ <u>1,500</u>
Advertising	\$ <u>3,000</u>
Total	\$ <u>81,500</u>
<u>Fiscal Year 2019/2020</u>	
<u>Salaries and Benefits</u>	\$ <u>70,000</u>
<u>Office Supplies and Equipment</u>	\$ <u>7,000</u>
<u>Travel Per Diem Workshops, etc.</u>	\$ <u>1,500</u>
<u>Advertising</u>	\$ <u>3,000</u>
<u>Total</u>	\$ <u>81,500</u>

EXHIBIT B

TIMELINE FOR SHIP EXPENDITURES

The City of Gainesville affirms that funds allocated for these fiscal years will meet the following deadlines:

Fiscal Year	Encumbered	Expended	1st Year AR	2nd Year AR	Closeout AR
2017-2018	6/30/2019	6/30/2020	9/15/2018	9/15/2019	9/15/2020
2018-2019	6/30/2020	6/30/2021	9/15/2019	9/15/2020	9/15/2021
2019-2020	6/30/2021	6/30/2022	9/15/2020	9/15/2021	9/15/2022

If funds allocated for these fiscal years is not anticipated to meet any of the deadlines in the table above, Florida Housing Finance Corporation will be notified according to the following chart:

Fiscal Year	Funds Not Encumbered	Funds Not Expended	1st Year AR Not Submitted	2nd Year AR Not Submitted	Closeout AR Not Submitted
2017-2018	3/30/2019	3/30/2020	6/15/2018	6/15/2019	6/15/2020
2018-2019	3/30/2020	3/30/2021	6/15/2019	6/15/2020	6/15/2021
2019-2020	3/30/2021	3/30/2022	6/15/2020	6/15/2021	6/15/2022

Requests for Expenditure Extensions (close-out year ONLY) must be received by FHFC by June 15 of the year in which funds are required to be expended. The extension request shall be emailed to robert.dearduff@floridahousing.org and terry.auringer@floridahousing.org and include:

1. A statement that “(city/county) requests an extension to the expenditure deadline for fiscal year _____.
2. The amount of funds that is not expended.
3. The amount of funds that is not encumbered or has been recaptured.
4. A detailed plan of how/when the money will be expended.

Note: an extension to the expenditure deadline (June 30) does not relieve the requirement to submit (September 15) the annual report online detailing all funds that have been expended. Please email terry.auringer@floridahousing.org when you are ready to “submit” the AR.

Other Key Deadlines:

AHAC reports are due for each local government the same year as the local government’s LHAP being submitted. Local governments receiving the minimum or less allocation are not required to report.

EXHIBIT C

HOUSING DELIVERY GOALS CHART FY 2017-2018

FLORIDA HOUSING FINANCE CORPORATION HOUSING DELIVERY GOALS CHART FY 2017-2018													LHAP EXHIBIT C	2017
Name of Local Government: City of Gainesville											Allocation: \$815,270.00		Please check applicable box, & if Amendment, enter number	
											New Plan:		X	
											Amendment:			
											Fiscal Yr. Closeout:		2020	
Strategy # From Plan Text	Code	HOMEOWNERSHIP STRATEGIES	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	MI Units	Max. SHIP Award	A New Construction SHIP Dollars	B Rehab/Repair SHIP Dollars	C Without Construction SHIP Dollars	D TOTAL SHIP Dollars	E TOTAL Percentage	F TOTAL Units
A	3	Homeowner Rehabilitation	4	\$50,000	4	\$50,000				\$427,000.00		\$427,000	52.38%	8
B	4	House Replacement	1	\$125,000		\$125,000				\$75,000.00		\$75,000	9.20%	1
C	3	Roof Replacement	2	\$15,000	2	\$15,000				\$60,000.00		\$60,000	7.36%	4
D	1.2	Downpayment Assistance w/Repairs	1	\$10,000	3	\$10,000	2	\$10,000		\$60,000.00		\$60,000	7.36%	6
E	10	Infill Housing Development		\$25,000		\$25,000		\$25,000				\$0	0.00%	0
F	7	Mortgage Foreclosure Intervention		\$5,000	1	\$5,000	1	\$5,000			\$10,000.00	\$10,000	1.23%	2
G	5	Disaster Mitigation		\$5,000		\$5,000		\$5,000				\$0	0.00%	0
Subtotal 1 (Homeownership)			8		10		3		\$ -	\$622,000	\$10,000	\$632,000	77.52%	21
Strategy # From Plan Text	Code	RENTAL STRATEGIES	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	MI Units	Max. SHIP Award	A New Construction SHIP Dollars	B Rehab/Repair SHIP Dollars	C Without Construction SHIP Dollars	D TOTAL SHIP Dollars	E TOTAL Percentage	F TOTAL Units
H	14,15,21	Rental Development		\$37,500		\$37,500		\$37,500				\$0	0.00%	0
I	26	Rapid Rehousing Rental Assistance	20	\$6,000							\$100,000	\$100,000	12.27%	20
J	13	Eviction Prevention		\$3,000		\$3,000								
Subtotal 2 (Non-Homeownership)			20		0		0		\$0	\$0	\$100,000	\$100,000	12.27%	20
Administration Fees												\$81,500	10.00%	
Admin. From Program Income												\$0	0.0%	
Home Ownership Counseling												\$1,770	0.22%	100
GRAND TOTAL			28		10		3		\$0	\$622,000	\$110,000	\$815,270	100.00%	41
Add Subtotals 1 & 2, plus all Admin. & H.O. Counseling														
Percentage Construction/Rehab			Calculate Constr./Rehab by adding Grand Total columns A&B, then divide by Annual Allocation Amt.										76.3%	
Maximum Allowable														
Purchase Price:			New		Existing				\$228,000		\$157,000			
Allocation Breakdown			Amount	%										
Very-Low Income			\$407,000	49.92%										
Low Income			\$290,000	35.57%										
Moderate Income			\$35,000	4.29%										
TOTAL			\$732,000	89.79%										
					Projected Program Income		\$ -		Max Amount Program Income/Admin:		\$ -			
					Projected Recaptured Funds:		\$ -							
					Distribution:		\$815,270							
					Total Available Funds:		\$815,270							

EXHIBIT C

HOUSING DELIVERY GOALS CHART FY 2018-2019

FLORIDA HOUSING FINANCE CORPORATION HOUSING DELIVERY GOALS CHART FY 2018-2019												LHAP EXHIBIT C		2018							
Name of Local Government: City of Gainesville												Allocation:		\$815,270.00		New Plan: X		Amendment:		Fiscal Yr. Closeout: 2021	
												A		B		C		D		E	
Strategy # From Plan Text	Code	HOMEOWNERSHIP STRATEGIES	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	MI Units	Max. SHIP Award	New Construction SHIP Dollars	Rehab/Repair SHIP Dollars	Without Construction SHIP Dollars	TOTAL SHIP Dollars	TOTAL Percentage	TOTAL Units							
A	3	Homeowner Rehabilitation	4	\$50,000	4	\$50,000				\$427,000.00		\$427,000	52.38%	8							
B	4	House Replacement	1	\$125,000		\$125,000				\$75,000.00		\$75,000	9.20%	1							
C	3	Roof Replacement	2	\$15,000	2	\$15,000				\$60,000.00		\$60,000	7.36%	4							
D	1,2	Downpayment Assistance w/Repairs	1	\$10,000	3	\$10,000	2	\$10,000		\$60,000.00		\$60,000	7.36%	6							
E	10	Infill Housing Development		\$25,000		\$25,000		\$25,000				\$0	0.00%	0							
F	7	Mortgage Foreclosure Intervention		\$5,000	1	\$5,000	1	\$5,000			\$10,000.00	\$10,000	1.23%	2							
G	5	Disaster Mitigation		\$5,000		\$5,000		\$5,000				\$0	0.00%	0							
Subtotal 1 (Homeownership)			8		10		3		\$ -	\$622,000	\$10,000	\$632,000	77.52%	21							
Strategy # From Plan Text	Code	RENTAL STRATEGIES	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	MI Units	Max. SHIP Award	New Construction SHIP Dollars	Rehab/Repair SHIP Dollars	Without Construction SHIP Dollars	TOTAL SHIP Dollars	TOTAL Percentage	TOTAL Units							
H	14,15,21	Rental Development		\$37,500		\$37,500		\$37,500					0.00%	0							
I	26	Rapid Rehousing Rental Assistance	20	\$6,000							\$100,000	\$100,000	12.27%	20							
J	13	Eviction Prevention		\$3,000		\$3,000															
Subtotal 2 (Non-Homeownership)			20		0		0		\$0	\$0	\$100,000	\$100,000	12.27%	20							
Administration Fees												\$81,500	10.00%								
Admin. From Program Income												\$0	0.0%								
Home Ownership Counseling												\$1,770	0.22%	100							
GRAND TOTAL			28		10		3		\$0	\$622,000	\$110,000	\$815,270	100.00%	41							
Add Subtotals 1 & 2, plus all Admin. & H.O. Counseling																					
Percentage Construction/Rehab												Calculate Constr./Rehab by adding Grand Total columns A&B, then divide by Annual Allocation Amt.		76.3%							
Maximum Allowable																					
Purchase Price:												New		Existing							
												\$228,000		\$157,000							
Allocation Breakdown			Amount	%					Projected Program Income	\$ -		Max Amount Program Income/Admin:		\$ -							
Very-Low Income			\$407,000	49.92%					Projected Recaptured Funds:	\$ -											
Low Income			\$290,000	35.57%					Distribution:	\$815,270											
Moderate Income			\$35,000	4.29%					Total Available Funds:	\$815,270											
TOTAL			\$732,000	89.79%																	

EXHIBIT C

HOUSING DELIVERY GOALS CHART FY 2019-2020

FLORIDA HOUSING FINANCE CORPORATION HOUSING DELIVERY GOALS CHART FY 2019-2020												LHAP EXHIBIT C	2019			
Name of Local Government: City of Gainesville												Allocation: \$815,270.00				
												Please check applicable box, & if Amendment, enter number				
												New Plan: X				
												Amendment:				
												Fiscal Yr. Closeout: 2022				
Strategy # From Plan Text	Code	HOMEOWNERSHIP STRATEGIES	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	MI Units	Max. SHIP Award	New Construction SHIP Dollars	Rehab/Repair SHIP Dollars	Without Construction SHIP Dollars	TOTAL SHIP Dollars	TOTAL Percentage	TOTAL Units		
A	3	Homeowner Rehabilitation	4	\$50,000	4	\$50,000				\$427,000.00		\$427,000.00	52.38%	8		
B	4	House Replacement	1	\$125,000		\$125,000				\$75,000.00		\$75,000.00	9.20%	1		
C	3	Roof Replacement	2	\$15,000	2	\$15,000				\$60,000.00		\$60,000.00	7.36%	4		
D	1,2	Downpayment Assistance w/Repairs	1	\$10,000	3	\$10,000	2	\$10,000		\$60,000.00		\$60,000.00	7.36%	6		
E	10	Infill Housing Development		\$25,000		\$25,000		\$25,000				\$0	0.00%	0		
F	7	Mortgage Foreclosure Intervention		\$5,000	1	\$5,000	1	\$5,000			\$10,000.00	\$10,000.00	1.23%	2		
G	5	Disaster Mitigation		\$5,000		\$5,000		\$5,000				\$0	0.00%	0		
Subtotal 1 (Homeownership)			8		10		3		\$ -	\$622,000	\$10,000	\$632,000	77.52%	21		
Strategy # From Plan Text	Code	RENTAL STRATEGIES	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	MI Units	Max. SHIP Award	New Construction SHIP Dollars	Rehab/Repair SHIP Dollars	Without Construction SHIP Dollars	TOTAL SHIP Dollars	TOTAL Percentage	TOTAL Units		
H	14,15,21	Rental Development		\$37,500		\$37,500		\$37,500				\$0	0.00%	0		
I	26	Rapid Rehousing Rental Assistance	20	\$6,000							\$100,000	\$100,000	12.27%	20		
J	13	Eviction Prevention		\$3,000		\$3,000										
Subtotal 2 (Non-Homeownership)			20		0		0		\$0	\$0	\$100,000	\$100,000	12.27%	20		
Administration Fees												\$81,500	10.00%			
Admin. From Program Income												\$0	0.0%			
Home Ownership Counseling												\$1,770	0.22%	100		
GRAND TOTAL			28		10		3		\$0	\$622,000	\$110,000	\$815,270	100.00%	41		
Add Subtotals 1 & 2, plus all Admin. & H.O. Counseling																
Percentage Construction/Rehab												Calculate Constr./Rehab by adding Grand Total columns A&R, then divide by Annual Allocation Amt.		76.3%		
Maximum Allowable																
Purchase Price:												New	\$228,000	Existing	\$157,000	
Allocation Breakdown			Amount	%												
Very-Low Income			\$407,000	49.92%												
Low Income			\$290,000	35.57%												
Moderate Income			\$35,000	4.29%												
TOTAL			\$732,000	89.79%												
									Projected Program Income		\$ -	Max Amount Program Income/Admin:		\$ -		
									Projected Recaptured Funds:		\$ -					
									Distribution:		\$815,270					
									Total Available Funds:		\$815,270					

EXHIBIT D

CERTIFICATION TO FLORIDA HOUSING FINANCE CORPORATION

Name of Local Government: **CITY OF GAINESVILLE**

- (1) The local government will advertise the availability of SHIP funds pursuant to Florida Statutes.
- (2) All SHIP funds will be expended in a manner which will insure that there will be no discrimination on the basis of race, religion, color, age, sex, familial or marital status, handicap, or national origin.
- (3) A process for selection of recipients for funds has been developed.
- (4) The eligible municipality or county has developed a qualification system for applications for awards.
- (5) Recipients of funds will be required to contractually commit to program guidelines.
- (6) The Florida Housing Finance Corporation will be notified promptly if the local government (or interlocal entity) will be unable to comply with the provisions the plan.
- (7) The Local Housing Assistance Plan shall provide for the expenditure of SHIP funds within 24 months following the end of the State fiscal year in which they are received.
- (8) The plan conforms to the Local Government Comprehensive Plan, or that an amendment to the Local Government Comprehensive Plan will be initiated at the next available opportunity to insure conformance with the Local Housing Assistance Plan.
- (9) Amendments to the approved Local Housing Assistance Plan shall be provided to the Corporation within 21 days after adoption.
- (10) The trust fund shall be established with a qualified depository for all SHIP funds as well as moneys generated from activities such as interest earned on loans.
- (11) Amounts on deposit in the local housing assistance trust fund shall be invested as permitted by law.
- (12) The local housing assistance trust fund shall be separately stated as a special revenue fund in the local governments audited financial statements, copies of the audits will be forwarded to the Corporation as soon as available.
- (13) An interlocal entity shall have its local housing assistance trust fund separately audited for each state fiscal year, and the audit forwarded to the Corporation as soon as possible.
- (14) SHIP funds will not be pledged for debt service on bonds or as rent subsidies.
- (15) Developers receiving assistance from both SHIP and the Low Income Housing Tax Credit (LIHTC) Program shall comply with the income, affordability and other LIHTC requirements. Similarly, any units receiving assistance from other federal programs shall comply with all Federal and SHIP program requirements.

- (16) Loans shall be provided for periods not exceeding 30 years, except for deferred payment loans or loans that extend beyond 30 years which continue to service eligible persons.
- (17) Rental Units constructed or rehabilitated with SHIP funds shall be monitored at least annually for 15 years for compliance with tenant income requirements and affordability requirements or as required in Section 420.9075 (3)(e)
- (18) The Plan meets the requirements of Section 420-907-9079 FS, and Rule Chapter 67-37 FAC, and how each of those requirements shall be met.
- (19) The provisions of Chapter 83-220, Laws of Florida has or X has not been implemented.

Witness

Chief Elected Official or designee

Witness

Lauren Poe, Mayor- City of Gainesville

Date

OR

Attest:
(Seal)

EXHIBIT E

RESOLUTION NO. _____

PASSED _____

A resolution of the City Commission of the City of Gainesville, Florida approving the Local Housing Assistance Plan as required by the State Housing Initiatives Partnership Program Act, Sections 420.907-420.9079, Florida Statutes; and Chapter 67-37, Florida Administrative Code; authorizing and directing the Mayor to execute any necessary documents and certifications needed by the State; authorizing the submission of the Local Housing Assistance Plan for review and approval by the Florida Housing Finance Corporation; and providing an effective date.

WHEREAS, the State of Florida enacted the William E. Sadowski Affordable Housing Act, Chapter 92-317 of Florida Sessions Laws, allocating a portion of documentary stamp taxes on deeds to local governments for the development and maintenance of affordable housing; and

WHEREAS, the State Housing Initiatives Partnership (SHIP) Act, Sections 420.907-420.9079, Florida Statutes, and Chapter 67-37, Florida Administrative Code, requires local governments to develop a one- to three-year Local Housing Assistance Plan outlining how funds will be used; and

WHEREAS, the SHIP Act requires local governments to establish the maximum SHIP funds allowable for each strategy; and

WHEREAS, the SHIP Act further requires local governments to establish an average area purchase price for new and existing housing benefiting from awards made pursuant to the Act; The methodology and purchase prices used are defined in the attached Local Housing Assistance Plan; and

WHEREAS, as required by Section 420.9075, Florida Statutes, it is found that 5 percent of the local housing distribution plus 5 percent of program income is insufficient to adequately pay the necessary costs of administering the local housing assistance plan. The cost of administering the program may not exceed 10 percent of the local housing distribution plus 5% of program income deposited into the trust fund, except that eligible municipalities receiving a local housing distribution of up to \$350,000 may use up to 10 percent of program income for administrative costs; and

WHEREAS, the Neighborhood Improvement Department has prepared a three-year Local Housing Assistance Plan for submission to the Florida Housing Finance Corporation; and

WHEREAS, the City Commission finds that it is in the best interest of the public for the City of Gainesville to submit the Local Housing Assistance Plan for review and approval so as to qualify for said documentary stamp tax funds.

NOW THEREFORE, BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF GAINESVILLE, FLORIDA that:

Section 1. The City Commission of the City of Gainesville hereby approves the Local Housing Assistance Plan attached as Exhibit “A” and incorporated hereto, for submission to the Florida Housing Finance Corporation as required by Sections 420.907-420-9079, Florida Statutes, for fiscal years 2017-2018, 2018-2019, and 2019-2020.

Section 2. The Mayor is hereby designated and authorized to execute any documents and certifications required by the Florida Housing Finance Corporation as related to the Local Housing Assistance Plan, including the Certification attached as Exhibit “B” and incorporated hereto, and to do all things necessary and proper to carry out the terms and conditions of said program.

Section 3. This resolution shall take effect immediately upon adoption.

PASSED AND ADOPTED this _____ day of _____, 2017.

LAUREN POE
MAYOR

Attest:

Approved as to form and legality:

KURT LANNON
CLERK OF THE COMMISSION

NICOLLE M. SHALLEY
CITY ATTORNEY

EXHIBIT F
ORDINANCE

NOT APPLICABLE

EXHIBIT G

INTERLOCAL AGREEMENT

Not Applicable