

SUMMARY OF RECOMMENDED CHANGES
2011 EVALUATION & APPRAISAL REPORT (EAR)

Housing Element

Goals, Objective and Policies: The entire Element should be revised to reflect the proper formatting of Goals, Objectives and Policies, as defined below.

Goal: General statement that defines what the Element will ultimately achieve.

Objective: A more specific statement than the stated Goal; describes actions that will help achieve the goal(s).

Policies: Specific statements that provide directives on how to achieve the objectives and ultimately the Element's goal(s).

Goals, Objective and Policies: The entire Element should be revised to reflect Department name changes, designee changes, renumbering due to objective and/or policy additions and/or deletions, and grammatical changes.

Objective 1: Evaluate for possible elimination of the affordable-workforce housing annual production rate requirement, or establish a new rate that is commensurate with the County's projected demand – based on County inventory, affordable-workforce units approved, but not yet built, and market conditions

Policy 1.1: Revise to reflect that the County presently has affordable-housing interlocal agreements with the City of Naples and the City of Marco Island; and, add a requirement that the municipalities shall re-evaluate their respective interlocal agreements with the County every three years.

Policy 1.4 Revise to ensure consistency with Section 163.3177(f) 1.g., Florida Statutes, and provide that no one affordable-workforce housing category is concentrated within any one geographic area

Objective 2: Modify to reflect the removal of the HDC reference and their stated mission; add the phrase “for- profit and not- for-profit providers of affordable-workforce housing” before the phrase, “shall assist Collier County...”; and, delete the references to “fifteen” percent and “1,000” units and replace with a new rate that is commensurate with the County's projected demand – based on County inventory, affordable-workforce units

approved, but not yet built, and market conditions, or evaluate for possible elimination of the affordable-workforce housing annual production rate requirement

- Policy 2.1:** Revise to remove agency reference, as it is no longer relevant
- Policy 2.9:** Revise to reflect new timeline for task completion
- Policy 2.10:** Revise to reflect departmental name change and program addition
- Policy 2.11:** Revise to replace the specific departmental reference with a general reference to the County
- Policy 3.5:** Revise to include a date for task completion
- Policy 3.7:** Revise to include a date for task completion
- Objective 4:** Revise to remove reference to survey being conducted by the City of Naples
- Policy 4.3:** Revise to include a date for task completion
- Policy 5.4:** Revise to include a date for task completion
- Policy 5.6:** Revise to include a date for task completion
- Policy 5.7:** Revise date to coincide with the amended survey commission date to be established in Policy 5.6.
- Objective 6:** Revise to delete the term, “group care facilities” and replace with the term, “group housing and Continuing Care Retirement Centers”
- Objective 7:** Revise to delete the term, “Urban Coastal Fringe” and replace with the term, “Coastal High Hazard Area”
- Objective 8:** Modify to remove the restriction that rehabilitated units must be located only in the Immokalee Urban Area, Rural Fringe Mixed Use District, and within the Rural Lands Stewardship Area.
- Policy 8.1:** Modify to remove reference to “non-conforming” residences in order to correlate with the Immokalee Area Master Plan Element
- Policy 8.2:** Delete, as Policy objective has been completed
- Policy 8.3:** Modify to reflect completion of survey and provide a reference that activities are ongoing

- Policy 8.6:** Revise to remove second sentence
- Objective 9:** Staff recommends creating a new Objective based on the 2009 adoption of HB 697, Green House Gas Reduction strategies
- Policy 9.1:** Staff recommends creating a new Policy based on the 2009 adoption of HB 697, Green House Gas Reduction strategies
- Policy 9.2:** Staff recommends creating a new Policy based on the 2009 adoption of HB 697, Green House Gas Reduction strategies
- Policy 9.3:** Staff recommends creating a new Policy based on the 2009 adoption of HB 697, Green House Gas Reduction strategies
- Policy 9.4:** Staff recommends creating a new Policy based on the 2009 adoption of HB 697, Green House Gas Reduction strategies
- Policy 9.5:** Staff recommends creating a new Policy based on the 2009 adoption of HB 697, Green House Gas Reduction strategies

**Assessment of Successes and Shortcomings
and Recommendations
for the Housing Element**

A. Introduction and Background

The purpose of the Housing Element is to provide guidance to the County in developing appropriate policies and programs which demonstrate the County's commitment to meet any identified and projected deficits in the supply of housing. Further, the stated Goal of the Housing Element is to provide an adequate supply of decent, safe, sanitary, and affordable housing for all residents of Collier County. In order to accomplish this goal, the County has implemented strategies aimed at the development of new residential units and the rehabilitation or demolition of substandard units.

During the planning period for this Evaluation and Appraisal Report (EAR), the County has successfully administered various State and Federal programs, including but not limited to, Community Development Block Grant (CDBG) entitlement funds, HOME Investment Partnerships Program (HOME) entitlement funds, Emergency Shelter Grant funds, State Housing Initiatives Partnership (SHIP) funds, and funds authorized by the Housing and Economic Recovery Act of 2008 - all of which funded numerous development and redevelopment activities. The range of funded activities includes, but is not limited to, a single family unit rehabilitation program, multi-family affordable rental unit development, park and infrastructure development, redevelopment of abandoned and foreclosed homes, and homebuyer education programs. In total, during this planning period, the County has assisted individuals and families with down payment and closing costs in the amount of \$11,571,965; funded residential rehabilitation projects in the amount of \$3,108,884; and, assisted in the development of affordable-workforce housing projects by deferring impact fees in the amount of \$9,723,672.68.

The County has been successful in reducing the number of substandard housing units, preserving historical and archeological resources, stabilizing neighborhoods by rehabilitating residential units, and encouraging development of, or commitments to develop, affordable-workforce housing within the County, through the establishment and funding of programs, and adoption of policies and regulations, aimed at achieving the County's housing objectives. However, notwithstanding these successes, the County's objective of creating 1,000 new affordable-workforce housing units each year during the evaluation period for this EAR has not been achieved. The County has approved approximately 4,214 affordable-workforce units to be built, but only 728 of those units have been constructed.

Recent cost-burdened household data, from the University of Florida's Shimberg Center for Housing Studies (July 2010), indicate that in 2010 approximately 35,942 residents are cost burdened, spending greater than thirty percent of their household income on housing related expenses, and by 2030 that number is expected to grow to 52,737 households. The data in Table 1. further indicate that over a 20-year period the average *annual* demand for affordable units will be approximately 840 units. This figure reveals an approximate 160 unit per year decrease in the affordable housing demand over the previous figure of 1,000 units recommended in the 2004 EAR.

Table 1.

Years	Average Annual Increase in Cost Burdened Households
2010 - 2015	732 Units/Year
2015 - 2020	881 Units/Year
2020 - 2025	890 Units/Year
2025 - 2030	856 Units/Year

Source: Shimberg Center, July 2010

The above data suggest that the County can reduce the annual production rate of affordable-workforce housing units. Further supporting this position is an estimated 3,486 affordable-workforce units approved, but not built, and the current availability of unrestricted affordable housing supply in the market as a result of the economic downturn across the State.

The recent decline in the housing market has increased affordability; however, it's important to note that these units are unrestricted (not subject to regulatory control of rental or sale price, occupant income level, time period to remain affordable, etc.), and are likely to increase in value as market conditions change over time. This in turn would reduce the affordable-workforce housing supply in the County. Regarding the approved, but not yet built units, it is unknown how many of those units will be built and when they would become available.

The Housing Element should continue to include a specific requirement for the provision of affordable housing to ensure that its goal, to provide an adequate supply of safe, decent and affordable housing for all residents of Collier County, is achieved. Continuing to secure "restricted" affordable-workforce housing units will reduce the long-term demand and increase the affordable-workforce housing supply in the County.

B. Objective Analysis

OBJECTIVE 1:

The number of new affordable-workforce housing units shall increase by at least fifteen percent of the units approved to be built in the County per year, but not less than 1,000 units per year averaged over a five-year period in an effort to continue meeting the current and future housing needs of legal residents with very-low, low and moderate incomes, including households with special needs such as rural and farmworker housing in rural Collier County.

Objective Achievement Analysis:

This objective has not been met. During years 2005-2009, the review period for this EAR, there have been approximately 4,214 affordable-workforce units approved to be built and approximately 728 units built in Collier County.

Estimates from the University of Florida's Shimberg Center for Housing Studies indicate that the increase in cost burdened households does not reach or exceed 1,000 units per year. The following is a summary of the projected increases in cost burdened households in Collier County through year 2030.

Years	Average Annual Increase In Cost-Burdened Households
2010 - 2015	732 units/year
2015 - 2020	881 units/year
2020 - 2025	890 units/year
2025 - 2030	856 units/year

Source: University of Florida Shimberg Center for Housing Studies, July 2010

As reflected above, the average annual increase in cost burdened households is not expected to exceed 890 units per year; the projections reveal a 160 unit per year need less than the current 1,000 unit requirement. This suggests that the Housing Element should be amended to reduce the minimum annual unit production of affordable-workforce housing. Further analyses of the above data show an annual average over 20 a year period to be 840 units. A newly revised minimum unit per year production of at least 10 percent of all units approved, but not less than 850 units per year built, may be more appropriate based on the available data.

The Objective remains relevant and should be retained. However, the Objective should be revised to reflect an annual yearly affordable-workforce unit production rate of at least ten percent of all units approved, but not less than 850 units constructed per year.

Planning Commission (CCPC) Comment from August 25, 2010 EAR Workshop – Suggesting to reduce the proposed affordable-workforce housing unit production figure of 850 units to 500 units to account for the future supply of affordable-workforce units approved, but not yet built, and the existing affordable-workforce housing supply, resulting from declining home prices caused by the economic downturn.

Staff Comment Post December 7, 2010 Planning Commission (CCPC) Adoption Hearing – Suggesting that staff work with the Department of Community Affairs to determine the appropriate number of affordable-workforce housing units to be constructed annually to meet demand within the County. [The BCC directed staff to include the market rate inventory with the EAR support data on 12/14/10.]

Board of County Commissioners (BCC) Comment from the January 31, 2011 Adoption Hearing – Evaluate for possible elimination of the affordable-workforce housing annual production rate requirement, or establish a new rate that is commensurate with the County’s projected demand – based on County inventory, affordable-workforce units approved, but not yet built, and market conditions.

Policy Relevance:

Policy 1.1:

Collier County shall pursue interlocal agreements with the City of Naples, the City of Marco Island, and Everglades City to require that each city provide their proportionate share of affordable-workforce housing units (or the financial equivalent). Each city’s proportionate share and financial equivalent will be evaluated and substantiated by the most current data, studies, and methods available to the County.

Policy Achievement Analysis:

The County has existing interlocal agreements with the City of Naples and the City of Marco Island. These agreements identify the municipalities' affordable-workforce housing obligations, based on current data, such as population and other methods available to the County.

Through the interlocal agreement between the County and the City of Naples, the City receives CDBG funds and participates in the SHIP program, returning its allocated 7 percent to the County to administer a joint affordable housing program. Through the interlocal agreement between the County and the City of Marco Island, the City provides \$50,000 dollars annually or 10 percent of the building permit revenues, whichever is greater, to the County to administer affordable housing programs.

This Policy remains relevant and should be retained. However, the Policy should be revised to reflect that the County presently has affordable-housing interlocal agreements with the City of Naples and the City of Marco Island; and, add a requirement that the municipalities shall re-evaluate their respective interlocal agreements with the County every three years.

Policy 1.4:

Collier County shall seek to distribute affordable-workforce housing equitably throughout the county where adequate infrastructure and services are available. Programs and strategies to encourage affordable-workforce housing development may include, but are not limited to, density by right within the Immokalee Urban area and other density bonus provisions, impact fee deferrals, expedited permitting (fast tracking), public-private partnerships, providing technical assistance and intergovernmental coordination.

Policy Achievement Analysis:

The equitable distribution of affordable-workforce housing throughout the county has been problematic and the location of the various affordable-workforce housing projects has been generally driven by market forces. The success of this Policy may continue to be based on market forces until affordable-housing incentives are adopted to encourage the provision of affordable-workforce housing in targeted areas of the County. Further, the County currently offers expedited permitting, flexible density and technical support to encourage and promote affordable-workforce development within the County.

This Policy remains relevant and should be retained.

Public Comment (Community Meeting on 1/25/10 and 2/23/10):

Public stated that the County does not do enough to provide housing opportunities in close proximity to employment centers, and thresholds should be established to minimize saturation of affordable housing in a single geography.

Planning Commission (CCPC) Comment from August 25, 2010 EAR Workshop – Suggesting the removal of the phrase, “seek to distribute affordable-workforce housing equitably throughout the county” and, insertion of text within the Policy that is consistent with Section 163.3177(f) I.g., Florida Statutes, which states, “...avoid the concentration of affordable housing units only in specific areas of the jurisdiction.”

Planning Commission (CCPC) Comment from December 7, 2010 – Suggesting that staff work with Habitat for Humanity representatives to revise Policy text, consistent with Florida Statutes. [Habitat representative voiced concern about proposed CCPC Policy change at the Hearing.]

Board of County Commissioners (BCC) Comment from the January 31, 2011 Adoption Hearing – Avoid the concentration of any one affordable-housing category within any one geographic area.

OBJECTIVE 2:

The Collier County Board of County Commissioners aided in the establishment of the Collier County Housing Development Corporation in 2003. The mission of the Housing Development Corporation is to serve as a non-profit agency, with an executive board made up of representatives from business, government, housing advocates, and the community at large, which along with other not for profit agencies shall assist Collier County and its municipalities in achieving a goal of increasing the number of affordable-workforce housing units by at least fifteen percent of the units approved to be built in the County per year, but not less than 1,000 units per year averaged over a five-year period for very-low, low and moderate income residents of Collier County.

Objective Achievement Analysis:

The mission of the Housing Development Corporation of Southwest Florida (fka The Collier County Housing Development Corporation) has shifted its focus to foreclosure prevention and homebuyer education. The Housing Development Corporation (HDC) is no longer an active participant in vertical construction.

The Objective remains relevant and should be retained. However, the Objective should be modified to reflect the removal of the HDC reference and their stated mission; add the phrase “for-profit and not-for-profit providers of affordable-workforce housing” before the phrase, “shall assist Collier County...”; and, delete the references to “fifteen” percent and “1,000” units and replace with “ten” percent and “850” units, consistent with the changes proposed in Objective 1.

Planning Commission (CCPC) Comment from August 25, 2010 EAR Workshop – Suggesting to insert the affordable-workforce housing production figure of 500 units, consistent with changes proposed in Objective 1.

Board of County Commissioners (BCC) Comment from the January 31, 2011 Adoption Hearing – Evaluate for possible elimination of the affordable-workforce housing annual production rate requirement, or establish a new rate that is commensurate with the County’s existing and projected demand – based on County inventory, affordable-workforce units approved, but not yet built, and market conditions.

Policy Relevance:

Policy 2.1:

Not for profit agencies, such as the Collier County Housing Development Corporation shall assist the County in reaching its annual affordable-workforce housing goal by holding workshops and fairs to raise awareness and understanding of housing issues in the County; working together to purchase and develop parcels; and, contributing funds towards the purchase of land for affordable-workforce housing projects.

Policy Achievement Analysis:

This Policy remains relevant and should be retained. However, the Policy should be revised to relect the removal of the HDC reference, as their focus has changed to foreclosure prevention and homebuyer education.

Public Comment (Community Meetings held on 1/25/10, 2/23/10 and 3/15/10):

Public stated that impact fee waivers are needed for affordable housing projects, and others stated that impact fees should be eliminated all together for affordable housing projects.

Policy 2.9:

The County shall review the County's Affordable-workforce Housing Density Bonus Ordinance every two years or sooner, as necessary, and revise the Ordinance, as necessary, to reflect changing community needs and market conditions. The purpose of the Affordable-workforce Housing Density Bonus Ordinance shall be to encourage the blending of affordable-workforce housing density bonus units into market rate developments as well as to support developments exclusively providing affordable-workforce housing.

Policy Achievement Analysis:

The Ordinance is currently under review by the Affordable Housing Advisory Committee, and is expected to be completed by December 2010.

This Policy remains relevant and should be retained. However, the Policy should be revised to reflect a new review time line of 3 years rather than 2 years, to make consistent with Section 420.9076 (4) F.S.

Public Comment (Community Meeting held on 3/15/10):

Public stated that density bonus incentives for affordable housing development within mixed use projects should be provided.

Policy 2.10:

The Collier County Operations Support and Housing Department shall continue to operate affordable-workforce housing programs, in cooperation with public and private sponsors, to provide safe, affordable-workforce housing to residents of the County's urban designated areas and rural areas. Programs operated by the Department will continue to include, but are not limited to:

- **Impact fee deferrals**
- **Housing rehabilitation and emergency repairs**
- **Down payment and closing cost assistance**

Policy Achievement Analysis:

The housing programs are working as intended. During the evaluation period for this EAR, the County has funded approximately \$9,723,672.68 in impact fee deferrals; \$3,108,883.69 in housing and rehabilitation and emergency repairs; and \$11,571,964.51 in down payment and closing costs for income qualified persons/families.

This Policy remains relevant and should be retained. However, the Policy should be revised to reflect a departmental name change – “Housing and Human Services Department”; and add to the listing of programs operated by the Housing Department, “Acquisition and rehabilitation program.”

Public Comment (Community Meeting held on 1/25/10):

Public stated that the County should provide land for affordable housing.

Policy 2.11:

The Collier County Operations Support and Housing Department will continue to coordinate with local utility providers to ensure that the necessary infrastructure and facilities for new housing developments are in place, consistent with the County’s Concurrency Management System.

Policy Achievement Analysis:

The Housing Department does not currently coordinate with local utility providers.

This Policy remains relevant and should be retained in some form. The Policy should be revised to reflect the removal of the “Collier County Operations Support and Housing Department” and in its place insert the following, “The County in coordination with for-profit and not-for-profit providers of affordable-workforce housing development...”

Public Comment (Community Meeting held on 3/15/10)

Public stated that public transportation should be provided proximate to affordable housing.

OBJECTIVE 3:

Collier County shall continue to support and adequately fund housing programs to promote the preservation and protection of existing, stable residential neighborhoods. This will be accomplished through the utilization of State Housing Incentives Partnership (SHIP) and CDBG programs including, but not limited to, down payment/closing cost assistance, rehabilitation and emergency repair, demolition with new construction, and impact fee deferrals.

[This Objective is provided for contextual purposes only; no change is proposed]

Policy Relevance:

*** Policy 3.5:**

The City of Naples will initiate a study of the Old Naples area to determine architectural and development standards to protect and preserve the existing residential character of the area.

Policy Achievement Analysis:

A study has not yet been conducted. However, the City remains interested in incentives to preserve and protect the existing residential character of the Old Naples area.

The Policy remains relevant and should be retained. However, the Policy should be revised to include a date when the study must be completed so that the Policy is measurable.

*** Policy 3.7:**

The City of Naples will implement their housing maintenance code to address the conservation of housing stock and the preservation and protection of residential neighborhoods.

Policy Achievement Analysis:

The City considered a Housing Maintenance Code, but one has not yet been adopted. The City does however include Neighborhood Action Plans for all recognized neighborhoods within the City as an element of its Comprehensive Plan. Specific needs and desires of each neighborhood are established, addressed and evaluated in those Plans.

The Policy remains relevant and should be retained. However, the Policy should be revised to include a date when the study must be completed so that the Policy is measurable.

OBJECTIVE 4:

Collier County and the City of Naples will conduct a comprehensive housing survey, every three years or sooner, for the purpose of identifying substandard dwelling units. Through continued enforcement of County housing codes, and the provision of housing rehabilitation or replacement programs, the number of substandard units (associated with a lack of plumbing and/or kitchen facilities) throughout the County shall be reduced by 5% per year through rehabilitation or demolition.

Objective Achievement Analysis: [County]

A comprehensive housing survey has been completed in certain areas of the County. The surveying of other geographies will occur in the future as funding and staff resources become available. The County, however, will continue its enforcement activities to reduce the number of substandard units within the county.

Objective Achievement Analysis: [City of Naples]

A comprehensive City-wide survey of Naples has not been completed. Generally, substandard housing units are identified by the City's Building and Code Enforcement Divisions. The City's Building and Code Enforcement Divisions do not conduct annual surveys of housing conditions to identify substandard units; such assessments occur only as a result of a natural disaster. Further, there have been no units rehabbed, demolished or replaced by the City through rehabilitation or replacement programs during this review period for this EAR. However, many units were rehabilitated by property owners following hurricane Wilma in October of 2005.

This Objective remains relevant and should be retained. However, the Objective should be revised to remove the reference to the City of Naples conducting a survey, as the City does not have this activity programmed or funded in their work plan.

Policy Relevance:

Policy 4.3:

Review and amend the existing relocation policy of the City of Naples and the County, and create one uniform relocation housing policy, consistent with the U.S. Department of Housing and Urban Development requirements.

Policy Achievement Analysis:

A uniform relocation housing policy has not yet been created for the County and the City of Naples. Until such a policy is adopted, both the County and City of Naples will continue to abide by the provisions of the Uniform Relocation Act.

This policy remains relevant and should be retained. However, the Policy should be updated to include a completion date for the joint County and City uniform relocation housing policy, so that the Policy is measurable.

OBJECTIVE 5:

Collier County and the City of Naples will annually monitor all identified historically significant homes to determine if these structures are being conserved, maintained, and/or rehabilitated.

[This Objective is provided for contextual purposes only; no change is proposed]

Policy Relevance:

Policy 5.4:

By 2008, Collier County and the City of Naples will study potential incentives to encourage the conservation, maintenance and rehabilitation of historic homes and will make recommendations to the City Council and to the Board of County Commissioners as to which incentives should be adopted.

Policy Achievement Analysis:

This Policy objective has not been achieved. The Board of County Commissioners and the City Council have not yet adopted incentives to encourage the conservation, maintenance and rehabilitation of historic homes.

However, in December, 2005, City Council and the City's Planning Advisory Board convened a joint meeting for the purpose of discussing a proposed historic preservation ordinance. Thereafter, planning staff was directed to prepare a revised draft ordinance that includes stronger incentives for the preservation of historic homes. The ordinance has not been adopted; however, the City remains interested in incentives to preserve historic structures.

This Policy remains relevant and should be retained. However, the Policy should be amended to reflect a revised completion date for the joint study between the County and the City of Naples by year 2011.

Policy 5.6:

By 2008, the Board of County Commissioners shall commission a new Historical Survey for all of unincorporated Collier County. The Survey shall review the current status of all previously identified historical structures and sites within the unincorporated County and shall make recommendations as to which of these sites or structures should be nominated to the National Register. The Survey shall also review and make similar recommendations regarding any previously unidentified historic structures or sites.

Policy Achievement Analysis:

This Policy objective has not been achieved due to an inability to fund the Survey. The County continues to rely on the Historical and Archeological Probability Map Series, updated in 1999, to determine if a project is within an area of probability.

The Policy remains relevant and should be retained. However, the survey commission date should be modified to reflect a future date when funding potentially would be available to the conduct the survey.

Policy 5.7:

By 2009, the Historical/Archaeological Preservation Ordinance shall be updated to include the results of the Historical Survey and to include any relevant changes in State or Federal regulations concerning historical properties.

Policy Achievement Analysis:

This Policy objective has not been achieved.

This Policy remains relevant and should be retained. However, the date of the required revisions to the Ordinance should be modified to coincide with the amended survey commission date established for Policy 5.6.

OBJECTIVE 6:

Collier County shall monitor changes to state and federal regulations pertaining to group care facilities, and, as necessary, amend its Land Development Code to ensure compliance.

Objective Achievement Analysis:

The County will continue monitoring all related state and federal regulations as an ongoing activity.

This Objective remains relevant and should be retained.

Planning Commission (CCPC) Comment from the August 25, 2010 EAR Workshop – Suggesting to replace the term “group care facilities” with “group housing and Continuing Care Retirement Centers” to broaden the purpose of the Objective.

OBJECTIVE 7:

Although mobile home parks currently exist within Collier County, as a result of the coastal community’s susceptibility to flooding and storm surges, any new mobile home parks will be restricted to areas outside of the Urban Coastal Fringe.

Objective Achievement Analysis:

The County currently prohibits new mobile home parks within the Urban Coastal Fringe.

This Objective remains relevant and should be retained.

Planning Commission (CCPC) Comment from the August 25, 2010 EAR Workshop – Suggesting to replace incorrect reference to the Urban Coastal Fringe with the correct reference to the “Coastal High Hazard Area.”

OBJECTIVE 8:

Collier County shall continue to utilize SHIP, CDBG, or other funding sources and, in partnership with Federal, State and non-profit housing agencies, will seek to provide a minimum of 50 rehabilitated or new residential units per year for very low, low and moderate income residents of the Immokalee Urban Area, Rural Fringe Mixed Use District, and within the

Rural Lands Stewardship Area. Families benefiting from such housing will include, but not be limited to, farmworkers and other populations with special housing needs.

Objective Achievement Analysis:

The County continues to exceed the minimum number of rehabilitation projects required by this Objective. During the latter years of the evaluation period for this EAR, the County assisted with the rehabilitation of 92 residential properties, and funded rehabilitation projects in the amount of \$3,108,883.69 during the entire review period for this EAR. Additionally, the County was allocated \$7,306,755 to assist with the redevelopment of abandoned and foreclosed homes and residential properties. As of June 2009, 35 percent of those funds have been committed for the acquisition and rehabilitation of foreclosed properties. Further, the County was awarded funding under the Disaster Recovery Initiative grant which has funded rehabilitation projects throughout the County.

It should be noted that the process for awarding funds to rehabilitate residential units must be competitive, not restricted to certain geographies within the County. As a result, the County recommends revising the Objective to remove the restriction that rehabilitated units must be located only in the Immokalee Urban Area, Rural Fringe Mixed Use District, and within the Rural Lands Stewardship Area.

Policy Relevance:

Policy 8.1:

Collier County shall continue to pursue the policy of requiring all non-conforming or sub-standard residences of any type within the Immokalee Urban Area to be either rehabilitated to current housing code standards or demolished.

Policy Achievement Analysis:

Collier County transmitted the revised Immokalee Area Master Plan (IAMP) Element to the Department of Community Affairs on June 23, 2010. This Element provides specific objectives to promote the rehabilitation of substandard residences within the Immokalee Urban Area.

This Policy remains relevant and should be retained. However, the Policy should be revised to remove the reference to “non-conforming” residences, so that it correlates with the Master Plan revisions that have no such policies.

Policy 8.2:

By 2008, Collier County shall complete a review of the residential density caps established within the Immokalee Area Master Plan Element of this Growth Management Plan. Based upon this review, the County shall determine if and where it may be appropriate to increase such caps, so as to encourage the development of new affordable-workforce housing units for farmworkers, very low, low and moderate income residents.

Policy Achievement Analysis:

The residential density cap review was completed as part of the Immokalee Area Master Plan (IAMP) Element re-write, transmitted to the Department of Community Affairs on June 23, 2010. The density caps were raised in certain sub-districts to 20 units per acre. This change would allow the development of an additional $\pm 6,730$ dwelling units within the Immokalee Urban Area; presumably promoting affordable-workforce housing developments.

This Policy is no longer relevant and should be deleted, as the Policy objective has been fulfilled.

Policy 8.3:

During 2004, the County completed a housing assessment survey of single family, multi-family, and mobile home units and mobile home parks in the Immokalee Urban Area, in order to determine the number of units that do not meet the County's current health, safety and minimum housing codes. The County shall target affordable-workforce housing and code enforcement programs to correct the conditions.

Policy Achievement Analysis:

The County has completed a housing assessment survey of the Immokalee Urban Area by the date specified in the Policy. As part of the survey, the County identified units that did not meet the County's minimum housing codes. The County will continue to work with area residents to correct housing conditions, and will continue to implement programs to improve the housing stock in the Immokalee Urban Area.

This Policy remains relevant and should be retained. However, the Policy should be modified to reflect the completion of the survey; and, include a reference identifying that activities are ongoing.

Policy 8.6:

Collier County will continue to utilize CDBG funds to provide farmworker-housing opportunities. In addition to housing units that currently qualify for assistance under SHIP program guidelines, special consideration of CDBG funds will be aimed at units that current SHIP program guidelines prohibit from assistance (i.e., mobile home units). Farmworkers will also be encouraged, through the use of multi-lingual outreach programs, to take advantage of any other CDBG, SHIP, Local, State, Federal and private programs for which they may qualify.

Policy Achievement Analysis:

This Policy remains relevant and should be retained. However, the Policy should be revised to remove the second sentence, as the process for awarding Federal and State funds is competitive and not intended for set-asides.

This Element is affected by changes to Chapter 163, Florida Statute, which were adopted into law in 2008, as follows:

163.3177(6)(f)1.h. and i. Requires that the housing element include standards, plans and principles to be followed in energy efficiency in the design and construction of new housing and in the use of renewable energy resources. Ch. 2008-191, LOF. (HB 697)

Staff proposed the below Objective and associated Policies to address these requirements.

OBJECTIVE 9:

Collier County shall support housing programs that encourage the development of energy efficient and environmentally sensitive housing.

Policy 9.1:

The County will encourage the construction of energy efficient housing by exploring innovative regulations that promote energy conserving and environmentally sensitive technologies and design.

Policy 9.2:

The County shall educate the public about the economic and environmental benefits of resource efficient design and construction.

Policy 9.3:

The County shall expedite plan review of housing projects that promote energy conservation and design.

Policy 9.4:

The County shall continue to encourage the development of mixed housing types near employment centers in order to reduce Green House Gas emissions and minimize carbon footprints.

Policy 9.5:

The County shall promote the incorporation of US EPA Energy Star Building and Appliances programs into construction and rehabilitation practices.