

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: Revise 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.

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.

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 "ten" percent and "850" units, consistent with the changes proposed in Objective 1.

Policy 2.1: Revise to remove agency reference, as it is no longer relevant.

Policy 2.9: Revise to reflect new time line for task completion

- Policy 2.10:** Revise to reflect departmental name change and Program addition
- Policy 2.11:** Revise to replace a specific departmental reference with a general reference
- Policy 3.5:** Revise to include a date for completion of the Policy task
- Policy 3.7:** Revise to include a date for completion of the Policy task
- Policy 4.3:** Revise to include a date for completion of the Policy task
- Policy 5.4:** Revise to include a date for completion of the Policy task
- Policy 5.6:** Revise to include a date for completion of the Policy task
- Policy 5.7:** Revise date to coincide with the amended survey commission date to be established in Policy 5.6.
- Objective 8:** Modify 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 8.1:** Modify to remove reference to “non-conforming” residences 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
- 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. A further analysis of the above data show an annual average over 20 years 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.

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 1.2:

Collier County and the City of Naples will work together to accomplish the community wide goal of supporting a sufficient supply of market rate and below market rate housing. This effort may include the consolidation of the City of Naples and the County housing programs and activities, including, but not limited to, state and federally funded programs such as SHIP and CDBG, in an effort to provide greater efficiency.

Policy Achievement Analysis:

The current programs are operating as intended. Presently, the City of Naples participates in the SHIP program and returns its allocated percentage of those funds to the County to administer a joint affordable-workforce housing program.

During this evaluation period for the EAR, the County has funded over \$9,723,672.68 in impact fee deferrals for residential construction and over \$3,108,883.69 for residential rehabilitation projects to accomplish its goal of increasing the supply of both market rate and below market rate housing.

This Policy remains relevant and should be retained.

Policy 1.3:

The City of Naples and Collier County shall explore the development of a fair share affordable-workforce housing ordinance that shall require commercial and residential developments to address the lack of affordable-workforce housing. The local jurisdictions will evaluate a broad range of options including the development of an affordable-workforce housing impact fee, the requirement that a percentage of units developed will be “set aside” for below market rate housing, an option whereby land could be donated to a nonprofit entity and/or placed in a land bank, or other alternatives that will assist in mitigating the rising need for affordable-workforce housing as the population increases.

Policy Achievement Analysis:

Collier County and the City of Naples have not yet adopted a fair share affordable-workforce housing ordinance.

During this evaluation period for the EAR, the Affordable Housing Advisory Committee worked with staff to evaluate various housing incentives and initiatives that would promote the development of affordable-workforce housing. The Committee’s proposed initiatives included, but were not limited to, land banking and inclusionary zoning.

The County and City will likely explore the development of a fair share affordable-workforce housing ordinance in the future.

This Policy remains relevant and should be retained.

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

Public stated that the County does not do enough to encourage or mandate a workforce housing component in developments.

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.

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.

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.

Policy 2.2:

Partnerships shall be encouraged between private developers, non-profit entities, local governments and other interested parties to ensure the development of housing that meets the needs of the County's very-low, low and moderate income residents.

Policy Achievement Analysis:

The County continues to partner with for-profit and not-for-profit agencies and local governments to ensure the development of housing that meets the needs of County residents. During the evaluation period for this EAR, the County has partnered with various entities to fund the acquisition and rehabilitation of homes for income qualified persons/families through programs, such as the Neighborhood Stabilization Program, authorized under the Housing and Economic Recovery Act of 2008.

This Policy remains relevant and should be retained.

Policy 2.3:

Collier County and the City of Naples staff will continue to provide community organizations with brochures and up-dates on various housing programs, grant opportunities, technical assistance and other information that will promote affordable-workforce housing opportunities for very low, low and moderate income residents.

Policy Achievement Analysis:

Collier County and the City of Naples participate cooperatively in all housing programs. However, it is the County that administers programs and seeks grants for affordable-workforce housing. Also, the County provides community organizations with brochures and up-dates on various housing programs, grant opportunities, technical assistance and other information to promote affordable-workforce housing opportunities for very low, low and moderate income residents.

This Policy remains relevant and should be retained.

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

Public stated that the County does not sufficiently address low income housing (incentives).

Policy 2.4:

Collier County and the City of Naples shall continue to review existing codes and ordinances and amend them as needed to allow for flexible and innovative residential design that encourages mixed use development with a variety of housing designs, styles, and price ranges.

Policy Achievement Analysis:

The codes for both the City of Naples and the County allow and promote flexible and innovative designs which encourage mixed use developments with a variety of housing types and price ranges. The City and County will continue to evaluate their respective land use plans and land development code regulations to encourage development that provides a variety of unit types and price ranges.

This Policy remains relevant and should be retained.

Policy 2.5:

Collier County and the City of Naples shall continue to review its existing permit processing systems in an effort to reduce the processing time and cost of affordable-workforce housing and continue to identify areas that can be streamlined.

Policy Achievement Analysis: [Collier County]

The County currently has an expedited review and permitting program for all affordable-workforce housing projects. The County will continue to evaluate its permitting processes in order to reduce processing time and costs for developing affordable-workforce housing. The City of Naples; however, does not currently have an expedited permitting process or a fee structure that provides for cost relief for affordable-workforce housing projects. However, expedited processing would be considered should an affordable housing project be proposed.

This Policy remains relevant and should be retained.

Policy 2.6:

Collier County shall continue to provide technical support and assistance to private developer and non-profit housing organization in their efforts to secure State or Federal funding.

Policy Achievement Analysis:

The Housing and Human Services Department provides technical assistance to affordable-workforce housing providers by educating those individuals or agencies about available funding sources, eligibility criteria, monitoring of monetary awards and procedures, and provides assistance with various application processes for obtaining State and Federal funding.

This Policy remains relevant and should be retained.

Policy 2.7:

Collier County shall increase the utilization of existing impact fee ordinances to facilitate the development of affordable-workforce housing through the provisions of deferrals.

Policy Achievement Analysis:

As of December 1, 2009 the impact fee deferral program has been suspended temporarily until revenue streams can support the program. However, during the review period for this EAR, the County

deferred approximately \$9,723,672.68 in impact fees to facilitate the development of affordable-workforce housing.

This Policy remains relevant and should be retained.

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 2.8:**

Provide financial, technical and support assistance to the residents of the Carver/River Park neighborhood through continued coordination with property owners, property managers and renters.

Policy Achievement Analysis:

Financial, technical and support assistance have been, and continue to be, provided to the Carver/River Park Neighborhood.

This Policy remains relevant and should be retained.

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.

Policy 2.12:

The County will continue to adopt and implement policies which provide for the proper siting and implementation of farm worker housing, including, but not limited to, strategies such as density bonus agreements, impact fee deferrals, and the provision of adequate infrastructure and services.

Policy Achievement Analysis:

The County recently transmitted the Immokalee Area Master Plan Element of the Growth Management Plan to the Department of Community Affairs. This Element provides specific policies that guide the development of farm worker housing within the Immokalee Urban Area.

This Policy remains relevant and should be retained.

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.

Objective Achievement Analysis:

Collier County and the City of Naples utilize SHIP resources and other funds to leverage the number and amount of loans provided by local lending institutions to very low, low and moderate income residents for home improvements, rehabilitation and first time homebuyer's assistance.

During this evaluation period for this EAR, the County used Federal and State funds for neighborhood stabilization programs in Immokalee, Golden Gate City, Golden Gate Estates and other areas throughout the County. Additionally, the Federal and State funds received by the City of Naples were dedicated to improvements in the River Park neighborhood.

This Objective remains relevant and should be retained.

Policy Relevance:

Policy 3.1:

Collier County shall continue to seek out and utilize federal, state and local resources for housing rehabilitation programs that repair and maintain the existing housing stock. The County shall also continue to support local municipal and non-profit efforts to identify and secure funding for housing rehabilitation programs.

Policy Achievement Analysis:

The County will continue to seek out and utilize federal, state and local resources for rehabilitation projects. During the evaluation period for this EAR, the County funded approximately \$3,108,883.69 in rehabilitation projects. Additionally, Collier County was the recipient of approximately \$7,306,755 authorized under the Housing and Economic Recovery Act of 2008 for the redevelopment of abandoned and foreclosed homes and residential properties.

This Policy remains relevant and should be retained.

Policy 3.2:

Collier County will support applications from for-profit and not-for-profit organizations that apply for state and federal funding for the purpose of constructing and/or rehabilitating affordable-workforce housing.

Policy Achievement Analysis:

The Housing and Human Services Department provides technical assistance to affordable-workforce housing providers by educating those individuals or agencies about available funding sources, eligibility criteria, monitoring of monetary awards and procedures, and provides assistance with various application processes for obtaining State and Federal funding.

This Policy remains relevant and should be retained.

Policy 3.3:

Collier County shall continue to utilize SHIP resources and other funds to leverage the number and amount of loans provided by local lending institutions to very low, low and moderate income residents for home improvements, rehabilitation and first time homebuyer's assistance.

Policy Achievement Analysis:

Collier County utilizes SHIP resources and other funds to leverage the number and amount of loans provided by local lending institutions to very low, low and moderate income residents for home improvements, rehabilitation and first time homebuyer's assistance.

This Policy remains relevant and should be retained.

***Policy 3.4:**

Through the Neighborhood Planning Process, the City will identify local housing issues and develop programs as needed to address these concerns.

Policy Achievement Analysis:

The lack of affordable workforce housing was identified as an issue in the City. In response, the City joined the Essential Services Personnel Coalition (ESP). The Coalition's mission was to focus on the establishment of "workforce" housing. However, the Coalition was dissolved by the Collier County School District, based on the District's determination that "the County has a significant amount of affordable housing available" due to the economic decline in the housing market.

The City will continue to work through the Neighborhood Planning Process to identify local housing issues and develop new programs, as needed.

This Policy remains relevant and should be retained.

*** 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 3.6:**

The City of Naples will study and make recommendations to amend the Code of Ordinances to address impacts of larger homes on smaller lots within the City of Naples. These changes will be reviewed to determine their effectiveness.

Policy Achievement Analysis:

The City continues to study the impacts of larger homes on smaller lots within the City, and will make changes to the Code, as needed. As a component of this study, the City has conducted a stormwater study and adopted a Stormwater Ordinance designed to minimize the impacts of larger homes on adjacent properties.

The Policy remains relevant and should be retained.

*** 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.

Policy 3.8:

Collier County will continue to maintain its Community Development Block Grant (CDBG) urban entitlement county status with the U.S. Department of Housing and Urban Development, which will continue to result in an annual allocation of federal funding available to assist very-low, low and moderate income households.

Policy Achievement Analysis:

The County continues to maintain its CDBG entitlement status, which has successfully funded a variety of activities, including but not limited to, infrastructure development, single-family rehabilitation program, and multi-family affordable rental developments in Immokalee.

The Policy remains relevant and should be retained.

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 funded or programmed in their work plan.

Policy Relevance:

Policy 4.1:

Utilize the most recent comprehensive housing inventory to develop and implement new programs to reduce substandard housing. Reduction of the number of substandard units will be accomplished by employing existing methods such as, but not limited to, housing code inspections, rehabilitation programs, and demolition of substandard units and their replacement with new construction.

Policy Achievement Analysis:

During the planning period for this EAR, the County used CDBG to fund a single family rehabilitation program and created the Collier County Neighborhood Stabilization Program to fund the redevelopment of abandoned and foreclosed homes and residential properties. Recent records (June 2007 – June 2009) indicate that the County assisted with the residential rehabilitation of 92 properties and assisted two not-for-profit agencies acquire and rehabilitate 28 homes.

This Policy remains relevant and should be retained.

Policy 4.2:

Require the demolition of dilapidated, unsafe or unsanitary housing that does not meet the housing code or, which cannot economically be rehabilitated.

Policy Achievement Analysis: [Collier County]

The County will continue to require the demolition of unsafe and/or unsanitary housing that does not meet the housing code or cannot be economically rehabilitated. During the planning period for this EAR, the County funded rehabilitation projects in the amount of \$3,108,883.69.

Policy Achievement Analysis: [City of Naples]

Substandard housing units are identified by the City's Building and Code Enforcement Divisions. During this planning period for this EAR there have been no units identified in the City as being unsafe or unsanitary.

This Policy remains relevant and should be retained.

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.

Policy 4.4:

In the event of a natural disaster, replacement housing shall comply with all applicable federal, state and local codes and shall consider factors such as, but not limited to, commercial accessibility, public facilities, places of employment, and housing income.

Policy Achievement Analysis:

This Policy remains relevant and should be retained.

Policy 4.5:

All dwelling units will be maintained in a safe and sanitary condition, including adequate light, ventilation, sanitation and other provisions, as required by the County and the City of Naples minimum housing codes. This task will be accomplished through housing code inspections and code enforcement actions, and housing rehabilitation programs supported through state, federal, local and/or private resources.

Policy Achievement Analysis: [Collier County]

The County continues to be committed to improving dwelling unit conditions for Collier County residents. Code Enforcement personnel will continue their housing code inspections in order to identify safe or unsanitary conditions.

Policy Achievement Analysis: [City of Naples]

The City of Naples does not have a housing code. Substandard housing units are identified by the City's Building and Code Enforcement Divisions. During this planning period for the EAR, there have been no units identified as being unsafe or unsanitary.

This Policy remains relevant and should be retained.

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.

Objective Achievement Analysis:

This Objective remains relevant and should be retained.

Policy Relevance:

Policy 5.1:

All residential structures that are listed on the National Register of Historic Places, or as contributing structures within the Old Naples National Register Historic District, or which are designated as locally significant historic resources, will be encouraged to maintain their historic value through the provision of technical assistance.

Policy Achievement Analysis: [County]

The County has adopted regulations to protect, preserve and perpetuate the County's historical and archeological sites, districts, structures, buildings and properties. The Historical and Archeological Preservation Board was created by the Board of County Commissioners, in part, to provide technical assistance to accomplish this Policy objective.

Policy Achievement Analysis: [City of Naples]

The City recognizes the Historic District and those properties listed on the National Register; however, the City does not currently have an ordinance establishing guidelines for historic preservation.

This Policy remains relevant and should be retained.

Policy 5.2:

Collier County and the City of Naples will review their land development regulations, building code, FEMA regulations, and other requirements every five years, and amend these as necessary to encourage the conservation, maintenance and rehabilitation of historically significant structures.

Policy Achievement Analysis:

The codes of the County and City encourage the conservation, maintenance and rehabilitation of historically significant structures. The Collier County Land Development Code regulates the use of land so as to maximize the protection to historical and archeological sites, districts, structures, buildings and properties. Further, the County and City enforce Floodplain (FEMA) and Florida Building Code regulations for historic structures.

This Policy remains relevant and should be retained.

***Policy 5.3**

The City will implement Objective 6 and all associated policies in the Future Land Use Element as they pertain to historically significant structures including the criteria for designation of locally historic resources found in Chapter 12 of the Support Document.

Policy Achievement Analysis:

This Policy remains relevant and should be retained.

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 5.5:**

The conservation and rehabilitation of housing, which is of historic significance, shall be accomplished by working with private sector groups and private developers to develop incentive-based programs.

Policy Achievement Analysis:

The City of Naples has not established an incentive program for the preservation of historic homes. However, the City remains interested in providing incentives to preserve historic structures.

This Policy remains relevant and should be retained.

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.

Policy Relevance:

Policy 6.1:

Provide non-profit group care facility organizations with information on federal, state and local housing resources that will assist them in the provision of special needs housing. On an annual basis, or as needed, provide technical assistance and support as organizations apply for funding assistance.

Policy Achievement Analysis:

Technical assistance provided to group care facility organizations include, but is not limited to, assisting with the monitoring of awards and procedures, providing eligibility criteria, identifying available funding sources, and providing assistance with various application processes for obtaining State and Federal funding is currently.

This Policy remains relevant and should be retained.

Policy 6.2:

Collier County shall review the County and the City of Naples Fair Housing ordinances and procedures with regard to group care facilities and shall seek to consolidate local fair housing implementation in order to promote consistency and coordination in the siting of such facilities between the jurisdictions.

Policy Achievement Analysis:

Group care facilities are allowed in specific zoning districts as either a permitted or conditional use. The facilities must meet specific siting criteria of the zoning district in which it is located. The County and the City continue to comply with State Statutes regarding group care facilities (Ch. 419, F.S.)

This Policy remains relevant and should be retained.

Policy 6.3:

Review the existing County and City of Naples land development regulations and building codes, and amend as necessary, to ensure compliance with State and Federal regulations to provide for group homes and foster care facilities licensed by the State of Florida.

Policy Achievement Analysis:

The County and City continue to comply with spacing and siting criteria for group homes and foster care facilities, as well as other statutory provisions of Ch. 419, F.S.

This Policy remains relevant and should be retained.

Policy 6.4:

Collier County may allow group care facilities in residentially zoned neighborhoods where adequate infrastructure, services and resources are available. The location of these facilities will be in compliance with local land use regulations and will be consistent with Chapter 419, Florida Statutes.

Policy Achievement Analysis:

This Policy remains relevant and should be retained.

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.

Policy Relevance:

***Policy 7.1:**

The City formally recognized the existence of one mobile home park in the city limits through a Planned Development rezone process. This rezone process recognized that the Naples Mobile Home Park does provide affordable housing opportunities to those living in the 141 mobile homes and 31 recreational vehicle spaces within this complex.

Policy Achievement Analysis:

This Policy remains relevant and should be retained.

***Policy 7.2:**

Additional mobile home developments will not be permitted in the city limits due to the City's low elevation, susceptibility to flooding, storm surges and high winds in hurricane and tropical storms and that mobile homes are particularly vulnerable to damage.

Policy Achievement Analysis:

There is no zoning provision that would allow for new mobile home developments within the city limits.

This Policy remains relevant and should be retained.

Policy 7.3:

The County has numerous sites where mobile homes are a permitted use and these sites will continue to be available for mobile home developments. However, due to the low lying elevations, susceptibility to flooding, storm surges and high winds from hurricanes and tropical storms, and that mobile homes are particularly vulnerable to damage, no additional sites will be zoned for mobile home development within the Coastal High Hazard Area, as depicted on the countywide Future Land Use Map.

Policy Achievement Analysis:

There are no zoning provisions that would allow for new mobile home developments within the Coastal High Hazard Area.

This Policy remains relevant and should be retained.

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 activities as ongoing.

Policy 8.4:

Funding for rehabilitation of both owner and rental units within the Immokalee Urban and Rural Lands Stewardship Areas will be provided through USDA funding, State SHIP funding, CDBG funding, or other appropriate funding sources, and leveraged with additional funding sources to the maximum degree possible.

Policy Achievement Analysis:

This Policy remains relevant and should be retained.

Policy 8.5:

Proposed farmworker housing sites will be evaluated and selected on the basis of health, safety and welfare concerns and to ensure that housing for this group is located in close proximity to employment locations, transportation opportunities, shopping opportunities, and health care facilities.

Policy Achievement Analysis:

This Policy remains relevant and should be retained.

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.