



Ninth Program Year Action Plan – DRAFT

The CPMP Seventh Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 9 Action Plan Executive Summary:

The Program Year 9 Action Plan for the City of Miami Gardens covers the period beginning October 1, 2014 through September 30, 2015. As in previous years, the programs and activities described in this 9th Year Action Plan are developed with three primary objectives, 1) providing benefits to low- and moderate-income individuals, and households, 2) providing benefits to neighborhoods with high concentrations of low- and moderate-income residents, and 3) benefits to the City as a whole. The City will also use the plan to coordinate its efforts with other federal, state, and local grant programs to produce decent housing, a suitable living environment and increase economic opportunities in the community.

The City intends to fully utilize its Program Year 9 allocation of \$999,851 to address the priority needs identified in the 2011-2016 Consolidated Plan. However significant funding cuts and fewer grant opportunities in the past couple of years has tasked the City with making tough decisions regarding some of the programs funded through the CDBG Program. As a result, the City will focus program year 9 funding on preserving decent and affordable housing stock through the City's housing programs; maintaining the safety and sanitary conditions of neighborhoods through infrastructure improvements; and providing much needed social services to city residents through our Public Services program.

NSP Round 1 and 3 funds will continue to be used to implement revitalization strategies in communities with high foreclosure rates. As part of NSP 1, the City has already purchased 74 abandoned and foreclosed homes in neighborhoods where high foreclosures and sub-prime mortgages exist, rehabbed and sold 65 homes to eligible first-time homebuyers, including 17 properties to households under 50% of the area median income. The City will continue to provide indirect subsidies to eligible homebuyers participating in the NSP program by selling the homes purchased and rehabbed with NSP funds at affordable prices. These activities are

already underway and will continue as part of the Program Year 9 Action Plan. The expected overall outcome of the NSP program is revitalization of communities where foreclosures were prevalent in causing the decline in home values and the quality of life. It is anticipated that the remaining 9 properties that have been purchased will be rehabilitated and sold to eligible homebuyers during Program Years 9 and 10. As part of NSP 3, the City has selected two developers to continue the City's stabilization efforts. These agreements are leveraging the funds originally granted to the City to achieve the total number of impact units needed in the target areas proposed in the NSP 3 Action Plan. One of those developers will provide 5 low-income housing units for sale at affordable prices, while the other will provide a low-income rental housing program for the elderly. Both agreements will continue into Program Year 9.

General Questions

Action Plan General Question responses:

1. Geographic areas of the jurisdiction

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*
- 2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.*
- 3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.*
- 4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

The City of Miami Gardens was incorporated on May 13, 2003, as the 33rd city in Miami-Dade County. With an estimated population of 107,167 it is the third largest city in the County, according to the 2010 US Census. The City is located in North-Central Miami-Dade County and covers an area of approximately 20 square miles. Miami Gardens borders Broward County to the north, the City of Miami Lakes and Unincorporated Miami-Dade County to the west, the City of Opa-Locka to the south, and the City of North Miami Beach and Unincorporated Miami-Dade County to the east.

Miami Gardens is an urban/suburban community that was heavily developed between 1950 and 1969. It is a solid, working and middle class community of unique diversity and holds the distinction of being the largest predominantly African-American municipality in the State of Florida. The City is 74% non-Hispanic Black, 20% Hispanic, 5% White non-Hispanic, and 1% other.

According to the 2005-2009 American Community Survey, approximately 15,982 households in the City of Miami Gardens earn 80% of the area median income or less, and are therefore classified as low-income by HUD. This represents approximately 47% of the citywide population for whom household income could be determined. Maps I-1 and I-2 in the 2011-2016 Consolidated Plan illustrate the following areas of the City: (1) the City location and (2) the CDBG priority areas by census block group and neighborhood.

2. Basis for Allocating Funding

Since the primary national objective of the Consolidated Plan programs are to benefit low- and moderate-income residents, the City of Miami Garden’s CDBG program funds will be utilized to develop programs and activities that will provide assistance to this target population, and benefit the City as a whole in improving the quality of life for the residents.

Target Areas: The City of Miami Gardens has identified twelve areas that have more than 50% of their residents within the low-to-moderate income range category, as defined by HUD. These areas are designated CDBG priority areas for the purpose of program funding.

Neighborhood	Census Tracts
Brentwood & Vicinity	010002-1
Bunche Park	000401-6, 000402-2, 000402-3, 000402-4*
Cloverleaf Estates & Vicinity	009501-9
Kings Gardens	010010-2
Lake Lucerne	009904-1, 009904-9
LeJeune Gardens & Vicinity	010006-1
Leslie Estates & Vicinity	010002-2
Myrtle Grove & Vicinity	009400-1
Rainbow Park	000403-1, 000403-5*, 000403-6
Vista Verde & Vicinity	010001-9
Unidentified	009600-2, 009902-3

**indicates neighborhood with greater than 70% low-mod income*

Public Services: The City continues to make public services a priority, setting aside the maximum amount of 15% of its annual CDBG allocation to these programs each year. Over the years, the City has implemented many programs by partnering with not-for-profit agencies that provide these services in the community. Some of these programs include; home delivered meals for the elderly, telephone reassurance services for seniors who live alone or are alone for most of the day, services for children who are victims of abuse, after school tutoring, a food pantry, and a youth development program for children living in HUD assisted housing in Miami Gardens.

Housing Rehabilitation: The City’s housing rehabilitation program has been widely successful. In just 8-years, the City has performed rehabilitation on 188 single family homes using CDBG as well as other grant funds; more than 700 homeowners and residents have benefited from this assistance. The program has provided better safety and living conditions for low- and moderate-income residents that would not have been able to afford such improvements. However, the City has a waitlist of more than 550 residents in need of housing repairs. While the City is young, just 11 years old, more than 53% of its housing stock is 50 years or older.

Infrastructure: The Livable Neighborhoods program was created in 2006 with the intent of improving storm water drainage facilities in neighborhoods with a history of flooding problems. Using CDBG and Disaster Recovery funding from the State of Florida, 3 projects were completed in Kings Gardens I & II, Bunche Park, and a portion of the Vista Verde Neighborhood. Over 5,000 households in these neighborhoods have benefited from the improved storm water drainage, sidewalks and crosswalks, lighting, and repaired streets; making these neighborhoods safer and more sanitary for their residents. Additional infrastructure improvements to the rest of the Vista Verde Neighborhood will continue into 2014-2015.

3. Obstacles to Meeting Underserved Needs

The great recession has impacted federal, state, and local government budgets over the past several years. The City is seeing a slight decrease of 2% in CDBG funding for program year 9, and overall federal funding has been on the decline since the 2010-11 fiscal year. The City's CDBG allocation has been reduced by 34% since the 2010-11 fiscal year. Furthermore, the national foreclosure crisis and the generally slow-moving recovery from the great recession has caused the City to rely on its municipal budget reserves to offset some of the budget deficits, which has reduced the reserve. These budgetary constraints have forced the City to make difficult decisions regarding the allocation of resources for programs in the community. These factors will limit the City's ability to fully fund all the program needs identified.

Despite these funding challenges, the City continues to seek partnerships with various state, county, and non-profit agencies with existing programs in the community to leverage the City's CDBG allocation.

4. Federal, State, and Local Resources Expected

In Program Year 9, the City's expected resources include:

- Program income generated from the Neighborhood Stabilization Program (NSP) Round 1;
- CDBG allocation of \$999,851; and
- State Housing Initiative Partnership (SHIP) Program estimated allocation of \$310,498.

Homeless assistance grants are administered by the Miami-Dade County Homeless Trust, which serves as the regional Continuum of Care.

Managing the Process

1. *Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*
2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*
3. *Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.*

Action Plan Managing the Process response:

1. Lead Agency

As the entitlement grantee for the CDBG programs, the City of Miami Gardens' Department of Community Development is the lead agency for the development of this 2014-2015 Action Plan that outlines the proposed activities and expenditures under these programs. Community Development staff will also act as the public agency that will administer the programs and activities under the plan. This Department will oversee economic development, community development, housing, lead paint abatement, public facilities and infrastructure improvement programs.

2. Plan Development Process

The City of Miami Gardens has implemented a process for the development of the 5-Year Consolidated Plan and the 2014-2015 Action Plan that encouraged broad participation from the community. At each step in the process, care has been taken to ensure that low- and moderate-income residents, members of minority groups, agencies involved in the provision of services to these populations, and others who are directly impacted by the programs and projects supported by the Consolidated Plan programs have been actively involved. The organizations that actively participated in the process included homeowner associations, faith-based organizations, community organizations, other service providers, residents and business owners.

3. Enhanced Coordination

As stated above, the City of Miami Gardens has limited resources to address the many priorities identified by the community. As such, during the upcoming year the City will continue working to create partnerships with other funding sources, public and private housing agencies, and health and social service providers to leverage the 2014-2015 CDBG allocation.

Citizen Participation

1. *Provide a summary of the citizen participation process.*
2. *Provide a summary of citizen comments or views on the plan.*
3. *Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*
4. *Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

**Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.*

Action Plan Citizen Participation response:

1. Citizen Participation Process

The City of Miami Gardens encourages its citizens to participate in the development of its Consolidated Plan, Annual Action Plan, any Amendments, and required Consolidated Annual Performance and Evaluation Report (CAPER). The City publicly advertises the meetings and holds the meetings in the City's Council Chambers and other central locations in the City, such as the Betty T. Ferguson Recreation Complex, which are publicly accessible.

In addition, the City will take steps to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities by providing translation services for any public meeting or public hearing, if a request for such services is requested four days in advance of the meeting. In addition, all meetings are conducted in areas and locations that are accessible to persons with disabilities.

Citizen Input: The City, on an annual basis, will make available to citizens, public agencies, and other interested parties, information that includes: the amount of assistance the City expects to receive, including specific grant funds, available unspent prior years funds, and related program income. The City will also disclose the range of activities that may be undertaken including the estimated amount that will benefit persons of low- and moderate-income.

City's Notification Requirement Regarding Draft Plan Availability: For Program Year 9, notification was advertised in a local newspaper of general circulation (The Miami Herald) to inform the public that a draft Annual Action Plan was available to examine and subject to public comment. The notification provided a summary of the proposed Annual Action Plan, and described the contents and purpose of the particular plan. The notice was also posted on the City's website (www.miamigardens-fl.gov) and at the location below. The public notice stated that copies of the Plan were available for review on the City's website and at the following locations for a period of 30-days:

City of Miami Gardens
Department of Community Development
18605 NW 27 Avenue, Suite 151
Miami Gardens, FL 33056

Public comment could also be submitted electronically by sending emails to: hudcomment@miamigardens-fl.gov.

Citizen Response Time Frame: The City will make the Plan public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the preparation of the final Annual Action Plan. The City will include any written or oral comments in the final Annual Action Plan submitted to HUD. The City will also make copies of the draft plan, and final plan available to the general public, at no cost on the City's website (www.miamigardens-fl.gov). Hard copies will also be available upon request.

Amendments: The City will amend its approved plan whenever it makes one of the following decisions:

1. To make a change in the goal, priority, or project of the Consolidated Plan; or
2. To carry out a project, using funds from any program covered by the Consolidated Plan (including program income), not previously covered in the Action Plan; or
3. To change the purpose, scope, location, or beneficiaries of a project included in the Annual Action Plan.

Each amendment must be authorized by the City Manager or his designee, and submitted to HUD. All amendments will also be made public by posting at City Hall and on the City's website (www.miamigardens-fl.gov). Amendments involving at least \$50,000 will also be advertised in the local newspaper. The amendment may be implemented immediately after submitting it to HUD and making it public.

A substantial amendment to the Consolidated or Annual Action Plan is defined by the City as a transfer between two or more Plan projects that is greater than 20% of each CDBG funding year allocation. Moving funds between same projects under different funding years, where accomplishments and activities do not change, will not require a substantial amendment.

Substantial amendments to the Plan will need to be presented to the City of Miami Gardens City Council for their review and approval. The public will also be notified of the amendment by advertising in the local newspaper. The advertising of the substantial amendment will begin a 30-day citizen review and comment period. The City will consider any comments or views of citizens received in writing or orally during the comment period, and will be submitted to HUD, and made available at City Hall, the Betty T. Ferguson Recreation Complex, and the North Dade Regional Library. The City Manager will submit a letter to HUD authorizing the amendment after the 30-day comment period and will implement the amendment at that time.

Performance Report: At the end of each program year, a Comprehensive Annual Performance and Evaluation Report (CAPER) must be submitted to HUD. The CAPER gives an actual account of the activities that occurred during the previous program year, and how the City maintained and expended the funds outlined in the Annual Action Plan for that program year.

Upon completion of the CAPER, and at least 15-days prior to its submission to HUD, the City will hold 2 public hearings to adopt the CAPER. The hearings shall be advertised at least 1 week in advance in a newspaper of general circulation throughout the area(s) eligible to receive funds

under the programs advertised. Additionally, the report will be made available to the general public for a 15-day public review and comment period. The notice and the draft CAPER will also be made available to the public via the City's website (www.miamigardens-fl.gov) at least 2 weeks prior to the hearing date. Any comments received from the general public will be included in the CAPER submitted to HUD.

Each public hearing notice must include the availability of an interpreter if a significant number of non-English speaking or hearing-impaired persons are expected to participate at the hearing. It will be the responsibility of the residents to notify the City at least 4-days in advance of the hearing if interpreter services are needed. Each public hearing notice will indicate this policy and provide a telephone number to contact the City. The City will consider any comments or views of citizens received in writing, or orally at the public hearings.

Access to Records: The City will provide citizens, public agencies and other interested parties access to information and records relating to the City's Consolidated Plan and the City's use of funds for the CDBG funds. Citizens will be able to download program information, action plans, and the consolidated plan documents from the City's website. In addition, citizens will be able to request hard copies or to meet with City staff to go over the records.

Technical Assistance: The Community Development Department will provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the federal or state programs covered by the Consolidated Plan. The level and type of assistance will be determined by the Community Development Department, but shall not include the provision of funds to any person, group, or agency.

Complaints: Citizens with complaints related to the Consolidated and Annual Action Plans, amendments, and the CAPER must submit the complaint in writing to:

City of Miami Gardens - Community Development Department
18605 NW 27 Avenue, Suite 151
Miami Gardens, FL 33056
Attention: Community Development Director

If the complaint is given orally, the person initiating the complaint must schedule a meeting with the Community Development Director at the above-mentioned address and a formal complaint letter will be transcribed. The person must sign the letter and submit an address for response. Upon receipt of the written complaint, the Community Development Staff will respond to the complaint in writing within 15 working days. A meeting to discuss the complaint must be scheduled by the person initiating the complaint.

Use of the Citizen Participation Plan: The requirements for citizen participation do not restrict the responsibility or authority of the jurisdiction in the development and execution of the City's Consolidated Plan.

2. Citizens Comments/Views on the plan

The City scheduled 2 citizens participation meetings to give residents an opportunity to give their input on the use of Program Year 9 federal funds. Meetings will be held on June 17, 2014 during the morning at 10am and on June 19, 2014, during the evening at 5pm. Additionally, a public hearing will be held on July 11, 2014 during the regularly scheduled City Council meeting.

3. Efforts made to broaden public participation

Each year the City makes every effort to reach out to residents, businesses and non-profit organizations to ensure their participation in this program year's process. A flyer was created detailing the program with dates and times of the meetings and was widely distributed throughout the City. Flyers were posted in City Departments, City Hall, the Betty T. Ferguson Recreation Complex, and the local public library. Additionally, flyers were distributed to all clients receiving services through our public services partnering agencies, to residents who have received assistance or are on the waiting lists of the City's housing rehab program, neighborhood crime watch groups, homeowners associations, area clubs, and churches.

4. Explanation of comments not accepted

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Action Plan Institutional Structure response:

The City of Miami Gardens Community Development Department is the lead administrative agency for the Consolidated Plan programs. The Department provides fiscal and regulatory oversight of all CDBG funding sources, as well as other Federal and State grants for housing, economic, and community development.

The City of Miami Gardens City Council acts as the final authority for the appropriation of funds for Annual Action Plan activities under the Consolidated Plan grant programs, following the recommendations of the City Manager. Within each of the priority funding areas, activities will be completed and managed by a diverse team of public, private, not-for-profit, and institutional partners. The lists below identify some of the principal partners for each priority funding area.

Decent Housing - Program Partners:

- Miami-Dade Public Housing and Community Development Department
- City of Miami Gardens Development Services Department
- City of Miami Gardens Police Department
- Florida Housing Finance Corporation
- Florida Housing Coalition
- Approved Housing Counseling Agencies
- Participating Financial Lending Institutions

Suitable Living Environment - Program Partners:

- City of Miami Gardens Public Works Department
- City of Miami Gardens Development Services Department
- City of Miami Gardens Police Department
- Homeowners Associations
- Faith Based Organizations

Public Services - Program Partners:

- Faith Based Organizations
- Not-for-Profit Organizations

Expanded Economic Opportunities - Program Partners:

- Greater Miami Gardens Chamber of Commerce

Consolidated Plan Delivery System

The City of Miami Gardens strives to use the CDBG program to create successful partnerships among public and private sector entities. The delivery system for the Consolidated Plan programs is no exception. Communication and cooperation between the City of Miami Gardens Department of Community Development and the partner agencies, organizations, and departments that administer activities is strong.

Monitoring

- 1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

Action Plan monitoring response:

The City of Miami Gardens Community Development Department shall conduct an initial site visit with each new sub-recipient within the first quarter of the contract period to provide technical assistance with implementing the program. A comprehensive annual on-site monitoring visit will also be scheduled during the program year. New sub-recipients may be visited more frequently in order to assist with questions and check on program progress. A monitoring schedule will be prepared and the sub-recipient visits will be prioritized by determining if any organizations are considered high risk, i.e., new to the CDBG program-first year as a sub-recipient; high staff turnover-especially in key positions; carrying out high-risk activities, such as economic development and/or conducting multiple CDBG activities for the first time.

The annual monitoring visits include the following: First, the assigned monitor contacts the agency to explain the purpose of monitoring and schedules a date and time for the on-site visit. Once this is completed, a confirmation letter is sent before the scheduled visit to confirm all aspects of the monitoring and to explain what can be expected. In preparation for the monitoring visit, the monitor will review all written data on file for the sub-recipient, such as application for CDBG funding, written agreement and amendments, monthly reporting requirements, documentation of previous monitoring, and copies of audits. During the actual visit, a thorough review of the sub-recipient's files ensures they comply with all regulations governing their administrative, financial and programmatic operations and that they are achieving their performance objectives within schedule and budget. A clear written record of the on-site visit is kept by using one or more of the City's monitoring checklists. The assigned monitor will fill out the form during the visit.

At the end of the visit, the monitor concludes the visit by reviewing the tentative conclusions from the monitoring. At this point, there will be a clear understanding between the monitor and sub-recipient of the areas of disagreement and agreement regarding the monitoring results. Once the on-site visit is completed, the monitor prepares a formal written letter describing the results of the visit, providing recognition of the sub-recipient's strengths and weaknesses. A copy of this letter is kept on file with the sub-recipient's grant agreement and monthly reports.

If the sub-recipient is experiencing problems or is failing to comply with regulations, these issues will be specifically outlined in the monitoring follow-up letter, along with recommendations or requirements to address and rectify the problems. If a concern or finding is issued for noncompliance with federal rules and regulations, the monitoring follow-up letter will provide recommendations on how the situation can be remedied, but no additional action is required. When a finding is issued, the monitoring follow-up letter will identify a deadline for when the specific issues must be corrected. The monitor will then follow-up with the organization to make sure the corrections have been made.

For situations in which the recommended corrections have not been made, the organization will be placed on a probationary period, which must be approved by the Community Development Director, until the issues have been rectified and the sub-recipient is once again in compliance with Federal regulations and the grant agreement.

Lead-based Paint

- 1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

Action Plan Lead-based Paint response:

Participant property owners are notified of the hazards of lead-based paint and of the symptoms associated with lead-based contamination. The City of Miami Gardens further prohibits the use of lead-based paint in any federally funded construction or rehabilitation project.

The City of Miami Gardens shall either perform paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all these painted surfaces are coated with lead-based paint. For residential properties receiving an average of up to and including \$5,000.00 per unit the City of Miami Gardens shall:

Perform paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all these painted surfaces are coated with lead-based paint. If testing indicates that the surfaces are not coated with lead-based paint, safe work practices and clearance shall not be required. In addition, the City of Miami Gardens will follow all additional requirements as listed in 24 CFR 35.930 (b).

For residential properties receiving an average of more than \$5,000.00 and up to and including \$25,000.00 per unit the City of Miami Gardens shall follow requirements of 24 CFR 35.930(c) which include but are not limited to risk assessments and interim controls.

For residential properties receiving an average of more than \$25,000.00 per unit the City of Miami Gardens shall follow regulations as set forth in 24 CFR 35.930(d) which include abatement.

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HOUSING

Specific Housing Objectives

**Please also refer to the Housing Needs Table in the Needs.xls workbook.*

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Action Plan Specific Objectives response:

1. Housing Objectives

The following table outlines the specific Housing accomplishment goals that the City of Miami Gardens hopes to achieve over the 2014-2015 Action Plan period.

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
NSP Rehabilitation	Households	9
Rehab, Single-Unit Residential	Housing Units	15

Housing Rehabilitation Program: Housing rehabilitation provides assistance for low- to moderate-income residents Citywide. Given the age of the City's housing stock, priority will be placed on improving energy efficiency in these units by replacing central air conditioning and insulation that are no longer energy efficient, disaster mitigation and weatherization, and addressing building and/or code violations when feasible, along with meeting Housing Quality Standards (HQS).

Homeownership Assistance Program: Provide direct homeownership assistance to low- to moderate-income first-time homebuyers participating in the Neighborhood Stabilization Program.

Neighborhood Stabilization Program (NSP): With NSP Round 1 and 3 funds, the City intends to purchase and rehabilitate foreclosed and abandoned homes. The rehabilitation will be done using the same standards as the housing rehabilitation program; however, because of the condition of some of these homes, repairs will be more extensive.

2. Use of Resources

In Program Year 9, the City estimates receiving an allocation from the Florida Housing Finance Corporation of \$310,498 in State Housing Initiatives Partnership (SHIP) Program funds. The City will use this allocation to augment the housing rehabilitation program by performing emergency roof repairs and replacements, and homeownership assistance. The City will continue to maximize these resources by leveraging the funds it receives and work creatively to attempt to meet the community's needs. Finally, program income received from the NSP funds will continue to expand our housing program activities, including rehabilitation and homeownership assistance.

Needs of Public Housing

1. *Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.*
2. *If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.*

Action Plan Public Housing Strategy response:

1. Partnership with Public Housing Agency

The Miami-Dade Public Housing and Community Development Department (PHCD) encourages public housing residents to become more involved in the management of the housing developments and to participate in homeownership through its Family Self-Sufficiency (FSS) program. PHCD has also implemented a Section 8 homeownership program to provide section 8 participants the opportunity to purchase a home. The housing agency also offers a variety of homeownership programs to low- and moderate-income families through its Development and Loan Administration Division and New Markets Division. Homeownership programs include: Surtax, State Housing Initiative, HOME, and infill programs.

2. Troubled Designation

The Miami-Dade County Public Housing is not troubled. Previous experiences with operations have been corrected and the merger with the Housing and Community Development Department has helped to focus future planning efforts as well as current operations.

Barriers to Affordable Housing

1. *Describe the actions that will take place during the next year to remove barriers to affordable housing.*

Action Plan Barriers to Affordable Housing response:

1. Barriers to Affordable Housing

The City of Miami Gardens has experienced a significant decrease in housing prices (-46%) over the past five years. Miami Gardens is an urban community that is 93% built out with a forecasted 9% increase in population growth by 2015. In addition, the nationwide sub-prime mortgage and foreclosure crisis and subsequent economic downturn have put downward pressure on home prices in the City. The recent economic crisis throughout the country has created an increase in job losses and foreclosures thereby creating a decrease in persons who are "mortgage ready."

2. Strategy to Remove Barriers

The City of Miami Gardens has established a new comprehensive development master plan and associated land development regulations specific to the City. In recognition of the impact that regulatory requirements have on the cost of development, the City has developed goals,

objectives, and policies to address affordable housing issues in the City. These policies will guide all future growth management policies established by the City. The goals are as follows:

- Affordable Housing Incentives: Provide incentives to assist in the provision of affordable housing.
- Adopt land development regulations and appropriate policies that assist private developers with providing (and sustaining) affordable housing.
- Through the comprehensive planning process and the land development regulations, streamline the permitting process providing for efficient review with minimal delays and waiving or reducing costs for development with a substantial affordable housing component.
- Offer technical assistance and referral services to applicants interested in developing affordable housing opportunities.
- Investigate the feasibility of using inclusionary zoning to encourage or require a certain percentage of dwelling units of new development or redevelopment to be set aside for low- or moderate-income housing. The City has adopted a new zoning code that includes Article VI Housing which addresses the following:
 - a) Promote the development and provision of high quality housing in the City of Miami Gardens;
 - b) Implement the goals, objectives and policies of the Housing Element of the City of Miami Gardens Comprehensive Development Master Plan to the maximum extent practicable;
 - c) Implement the recommendations of the City of Miami Gardens Affordable Housing Advisory Committee to the maximum extent practicable;
 - d) Increase and otherwise encourage home ownership opportunities within the city;
 - e) Stimulate private sector production of workforce housing units for ownership, available to families within the range of 65 percent to 200 percent of the area median income;
 - f) Facilitate and encourage residential development that includes a range of high quality housing opportunities through a variety of residential types, forms of ownership, and home sale prices;
 - g) Encourage even and widespread distribution of high quality housing opportunities throughout the City; and
 - h) Insure that new housing in the City meets high quality development standards.
- Consider awarding density and height bonuses for the provision of workforce housing in new developments, on infill sites, or within mixed-use developments as referred to in the Future Land Use Element.
- Encourage the development of rental housing alternatives for family households.
- Examine the feasibility of adopting a mixed income ordinance that requires any new mixed-use development exceeding a specific threshold of units to include an affordable component.
- Develop incentive programs in conjunction with a Community Design Element of the Comprehensive Development Master Plan for increasing residential housing densities and providing enhanced urban amenities with funding programs for multistory parking, combining public open space, shared parking areas for use in high density/intensity projects and other similar techniques and mechanisms.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Action Plan HOME/ADDI response:

Not applicable; the City of Miami Gardens does not receive a direct allocation of HOME funds.

HOMELESS

Specific Homeless Prevention Elements

**Please also refer to the Homeless Needs Table in the Needs.xls workbook.*

1. *Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.*
2. *Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.*
3. *Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.*
4. *Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*
5. *Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.*

Action Plan Special Needs response:

1. Source of Funds

The Homeless Trust pools the Entitlement Jurisdiction funds for all of Miami-Dade County to provide a wide variety of Homeless Assistance Programs. The City of Miami Gardens along with the cities of Miami, Miami Beach, Hialeah, Homestead and North Miami has joined in partnership with the Miami-Dade County Homeless Trust to provide countywide Homeless Assistance Services. These funds will go directly to Miami-Dade County for regional distribution.

The City of Miami Gardens has mirrored the priorities of the Homeless Trust as its regional service provider. The table below outlines the relative priorities of various categories of homeless needs within the Continuum of Care. Activities that are identified as “Medium” priorities will likely receive Consolidated Plan funding if the applicable formula grants to the City of Miami Gardens are increased during the next five years. Activities that receive a “Low” priority will not receive Consolidated Plan funding over the next five years without an amendment to this Consolidated Plan.

A “Low” rating does not necessarily diminish the importance of these activities or indicate that there is no need for them in the City. Many activities that are assigned a “Low” priority for CDBG funding are nevertheless important needs for the community or high priorities for other

sources of funding. Some activities receive “Low” ratings if they are funded under the County’s programs, if the Consolidated Plan funding would be insufficient to have a meaningful impact on these needs, or if adequately funding them would result in minimal output or outcome accomplishments relative to the amount of funds expended at the expense of other priority programs.

Table III-4: Priority Homeless Needs Funding

Housing Continuum of Care	Individuals	Families	Funding Source
Emergency Shelter	Low	Low	Other, County
Transitional Housing	Low	Low	Other, County
Permanent Supportive Housing	Medium	Medium	Other, County
Chronically Homeless	Medium	Medium	Other, County

The addition of HPRP funds in Program Years 4, 5, and 6 allowed the City to address the needs of individuals and families that are either at risk of homelessness or currently homeless with assistance in housing stability; directly meeting the needs of populations that were at or below 50% AMI. However, the City no longer receives a direct allocation of HPRP funds. Instead, all Federal Homeless Assistance funding will go directly to the Miami-Dade Homeless Trust, as the Continuum of Care, for regional distribution.

2. Homelessness

As required by HUD each jurisdiction must develop a local continuum of care plan, the City of Miami Gardens in partnership with Miami-Dade County Homeless Trust (the Trust) operate under the Miami-Dade County Community Homeless Plan. The Trust serves as the lead agency implementing a countywide strategy to serve homeless individuals and families throughout our community. The Trust pools the entitlement jurisdiction funds for all of Miami-Dade County to provide a wide variety of Homeless Assistance Programs. The City of Miami Gardens, along with the Cities of Miami, Miami Beach, Hialeah, Homestead, and North Miami has joined in partnership with the Trust to provide countywide Homeless Assistance Services.

Each year the Trust meets with all of its entitlement partners to establish funding priorities for the upcoming year. The City of Miami Gardens in partnership with the Trust established the priority homeless needs identified in this plan.

3. Chronic Homelessness

The following describes the action steps which the Trust will implement in order to eliminate chronic homelessness.

Phase One - Temporary (Emergency) Care:

- Increase coordination with One Stop Centers, State and Federal agencies and other social services systems to maximize available resources;
- Assess the impact of the hard-core, chronic homeless with high service needs and access to the emergency housing system to determine what additional resources may be required;
- Enhance the role of emergency housing in the “housing first approach” model to address homelessness by moving families and individuals directly into permanent housing;
- Increase the inventory of emergency housing serving the chronic homeless population

Phase Two - Primary Care (Transitional) housing:

- Shift of Food and Beverage funding from transitional non-treatment housing to permanent housing, via a Housing 1st, housing placement program;
- Identify additional resources to maintain and/or expand the inventory of beds to provide mental health and substance abuse treatment;
- Identify a funding source for capital and supportive services match funds;
- Coordinate homeless funding by other local social service funders;

Phase Three - Advanced Care (permanent supportive) housing units:

- Creation of 100-200 units of permanent supportive housing per year, for 10 years;
- Via a new Case Rate, pay for performance model, those people identified by homeless outreach and the courts, who are experiencing chronic homelessness, high utilizers of jails, emergency rooms, and crisis services and are typically service resistant, are being placed in a variety of permanent housing models;
- Remove barriers to the funding of permanent housing: draft local and state legislative proposals that set-aside and/or prioritize housing for formerly homeless persons and participate actively in rule-making processes;
- Identify a funding source for capital match funds; and explore the use of permanent housing in the “housing first approach” in ending homelessness;

4. Homelessness Prevention

Through the Countywide Homeless Helpline, individuals and families at risk of homelessness are assessed and provided with or linked to appropriate services, including but not limited to: case management, rental assistance, mortgage assistance, utility assistance, and other services. FEMA funds available through the Emergency Food and Shelter Board, are used for the same purpose. The Greater Miami Prosperity Campaign via the Human Services Coalition provides Tax and Earned Income Tax Credit Assistance to individuals residing in Miami-Dade County Homeless Assistance Centers and in One Stop locations.

In 2009 the Housing Assistance Network of Dade (HAND) was created by Citrus Health Network with HPRP funding from the Cities of Miami Gardens, Miami, and North Miami and Miami-Dade County, which has greatly enhanced the County’s currently in place homeless system and prevention activities and services. Although the Cities no longer receive a direct allocation of HPRP funds, the HAND network continues to operate and provide these services throughout Miami-Dade County with funding from the Homeless Trust and the State of Florida.

5. Discharge Coordination Policy

In 2007, Miami-Dade County underwent a process to implement a cohesive community-wide discharge coordination policy. As a result of that process, the County developed a Memoranda of Agreement establishing discharge policies for all agencies that provide services to homeless persons or those at risk of homelessness. The interagency Agreement includes the Miami-Dade Homeless Trust, State and County Correction agencies, the 11th Circuit Court, Jackson Memorial Hospital/Public Health Trust, community mental health facilities, Our Kids, Inc., and the Florida Department of Children and Families.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Action Plan ESG response:

Not applicable; the City of Miami Gardens does not receive a direct allocation of ESG funds. Instead, these funds are awarded to Miami-Dade County through the Homeless Trust for regional distribution.

DRAFT

COMMUNITY DEVELOPMENT

Community Development

**Please also refer to the Community Development Table in the Needs.xls workbook.*

1. *Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.*
2. *Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

**Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.*

Action Plan Community Development response:

1. Priority non-housing community development needs

As defined in the City of Miami Garden's mission statement, the City's core community development needs are those activities that enhance the quality of life through the efficient and professional delivery of public services. The City is committed to fostering civic pride, participation and responsible economic development for the community, and as such the City anticipates using Community Development Block Grant (CDBG) funding to support programs to:

- Assist in the development of state of the art recreational facilities and services.
- Provide funding to redevelop blighted commercial and residential areas.
- Improve infrastructure facilities, including storm water drainage, sewer, street lighting, sidewalks, and othe infrastructure facilities.
- Create economic development programs that promote business attraction and retention
- Creat programs and services for youth and elderly residents

CDBG and other funding will be used to strengthen, preserve, and enhance the physical character of and quality of life in City of Miami Gardens neighborhoods. Designated funding will be used to improve the housing stock, as well as economic development with particular emphasis on the low- and moderate-income neighborhoods.

Economic Development Programs: Through the City's adopted Comprehensive Economic Development Strategy, particular emphasis will be placed on programs that cultivate entrepreneurship and create opportunities for larger-scale job creation through site assembly, environmental remediation, building rehabilitation, infrastructure development, technical assistance, and assistance to businesses. One of the targeted areas in the Strategy is the Sunshine State International Park, a once vibrant and thriving business district with both manufacturing and retail businesses. The area has experienced significant deterioration and

businesses have either gone out of business or relocated to another community. It is the City’s intention to re-engage the industrial park as a mixed-use site with the appropriate combination of commercial, entertainment and service uses that harmonize with existing industrial uses. The City has already taken steps to initiate this process; passing new zoning codes to allow mixed uses, as well as seeking out other funding sources to help in the redevelopment of the park. The redevelopment of the park will spur economic activity into the local economy through tourism/visitor revenues, job creation and tax revenues.

Create Programs and Services for Youth and Elderly Residents: CDBG and other funding will be used to implement programs to assist the youth and elderly populations in providing them increased access to benefits and credits.

Livable Neighborhoods Initiative Program: CDBG and other funding will be used to implement improvements to residential storm water drainage facilities, street lighting, and landscaping to address flooding, and safety issues in three specifically designated neighborhoods. These neighborhoods are Kings Gardens I, II, & III, Vista Verde, and Garden Circle. All three neighborhoods have been determined to be at least 51% low-moderate income. Program Year 9 improvements will be conducted in the Vista Verde neighborhood and will include pre-development expenses and construction.

Consistent with HUD Community Development Needs Table, the relative priority of community development activities were identified with input obtained from numerous outreach efforts, and consultations during the 2011-2016 consolidated planning process.

Three distinct tables in the Consolidated Plan document defines activities that received high, medium and low priority ranking during the visioning and focus group exercises conducted in support of the Consolidated Plan. The first table (Table IV-1), identified Public Facilities and Improvements Priorities, the second table (Table IV-2), identified Public Services Priorities, and the third table (Table IV-3), identified Housing, Economic Development, & Historic Preservation Priorities. Activities identified as high and medium priorities were consistent in all three tables. High and medium priorities centered around housing rehab, street and drain improvements, homeownership assistance, energy efficiency, services for youth and seniors.

2. Specific Long Term and Short Term Objectives

Accomplishment goals have been established for those activities that received a high priority ranking. The following tables, consistent with HUD Community Development Need Table provide the specific output accomplishment goals for each activity. These activities are listed under the five community priorities as defined by the stakeholders throughout the visioning process. Because funding for "medium" and "low" priority activities may not be available, accomplishment goals have not been provided for these categories. The accomplishment goals represent the activities anticipated in the 2014-2015 Action Plan period. A discussion of anticipated outcomes for each conceptual goal is as follows:

1) Public Services

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Youth Services	People Served	100
Senior Services	People Served	100

Priority projects in this category include support for public service activities that benefit youth and senior populations. These activities will assist the City of Miami Gardens in moving closer to achieving its goal of providing sustained services for the residents of Miami Gardens.

2) Redevelop aging housing stock in residential areas

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Rehab, Single-Unit Residential	Housing Units	15
NSP Rehabilitation	Households	9
NSP Direct Homeownership Assistance	Households	9

The priority projects in this category includes housing rehab projects benefiting low- to moderate-income residents with a focus on weatherization and code enforcement activities to eliminate substandard and blighted influences. NSP priorities continue to be the rehabilitation of abandoned and foreclosed properties and the resale of these properties to eligible first-time homebuyers. Homebuyer assistances is provided as needed to homebuyers participating in the NSP program.

3) Public Facilities and Improvements

ACTIVITY	ACCOMPLISHMENT UNITS	GOAL
Infrastructure (Livable Neighborhoods)	Area Benefit (households)	2000

Priority projects in this category include improvements to residential storm water drainage facilities to address flooding issues in targeted low-mod census tracts.

Antipoverty Strategy

1. *Describe the actions that will take place during the next year to reduce the number of poverty level families.*

Action Plan Antipoverty Strategy response:

The City of Miami Gardens Anti-Poverty Strategy describes the programs and policies that will be utilized to reduce the number of households with incomes below the poverty line, in coordination with affordable housing efforts. The Department of Community Development will deploy a strategy responsive to the needs of low-income citizens and disadvantaged populations throughout the City.

The Department of Community Development will further the U.S. HUD national objectives by coordinating the priorities established in the City's visioning process with goals and objectives adopted by HUD.

The City's strategy will:

- Work with existing programs to maximize program dollars for residents.
- Leverage potential CDBG eligible activities with private, state, and local funds.
- Implement programs in the Neighborhood Revitalization Strategy Areas to maximize funding and program opportunities in neighborhoods with greater than 70% low to moderate-income residents.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

**Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.*

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Action Plan Specific Objectives response:

1. Priorities and specific objectives

The chart below outlines the relative priority needs for various identified special needs categories for housing and supportive services in Miami Gardens. Activities which are labeled as “High” priorities in the table below and elsewhere in this plan are those which will receive 2014-2015 Action Plan funding. Activities which are identified as “Medium” priorities are those that will not receive Action Plan funding unless additional funds are secured or particularly strong projects are identified. Activities that receive a “Low” priority will not receive Plan funding without a Plan Amendment.

Special Needs Category	Housing	Supportive Services
Elderly	High	High
Individuals with Disabilities	Medium	Low
Individuals with HIV/AIDS	Low	Low
Public Housing Residents	Medium	Medium

2. Use of Resources

The City of Miami Gardens is working to secure various funding streams to enhance our CDBG programs. Currently, the City will expand housing rehabilitation programs by increasing its allocation of CDBG funds to housing programs in program year 9, and utilizing funding received from the 2014-15 SHIP Program that will enhance the CDBG program as well as benefit the City as a whole.

Housing Opportunities for People with AIDS

**Please also refer to the HOPWA Table in the Needs.xls workbook.*

1. *Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.*
2. *Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.*
3. *Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.*
4. *Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.*
5. *Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.*
6. *Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.*
7. *Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.*
8. *Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.*

Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Action Plan HOPWA response:

Not applicable; the City of Miami Gardens does not receive a direct allocation of HOPWA. Instead, these funds are awarded to the City of Miami for regional distribution.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Specific HOPWA Objectives response:

Not applicable; the City of Miami Gardens does not receive a direct allocation of HOPWA. Instead, these funds are awarded to the City of Miami for regional distribution.

PUBLIC COMMENTS

The following is a summary of the relevant Questions and Comments received during the Citizen's Participation Meetings held on June 17 & 19, 2014. Comments have been grouped into categories.

Questions/comments are **in bold**, responses from staff are in *italics*.

Once all comments are received they will be added here.