

# Building Capacity for Affordable Housing in Immokalee



A Report to the Collier County Community and Human Services Division

Prepared by Florida Housing Coalition, Inc.

May 2016

## Table of Contents

<b>Introduction.....</b>	<b>3</b>
<b>Section I: Housing Needs Assessment.....</b>	<b>5</b>
<b>Section II: Community Input.....</b>	<b>23</b>
<b>Section III: Affordable Workforce Housing Workshop.....</b>	<b>34</b>
<b>Section IV: Impact of Land Use Policies and Regulations.....</b>	<b>38</b>
<b>Section V: Strengthening Collier County’s SHIP Program.....</b>	<b>59</b>
<b>Conclusion .....</b>	<b>61</b>
<b>Appendix A: Overcrowding and Incomplete Kitchen or Plumbing Facilities in Immokalee Units</b>	<b>64</b>
<b>Appendix B: Methodology for Figures in Text.....</b>	<b>65</b>
<b>Appendix C: Rents at Selected Subsidized Housing Developments in Immokalee.....</b>	<b>68</b>
<b>Appendix D: List of Recommendations .....</b>	<b>69</b>
<b>References.....</b>	<b>81</b>

This report was funded by a U.S. Department of Housing and Urban Development (HUD) Rural Capacity Building Technical Assistance Grant administered by the National Association for Latino Community Asset Builders (NALCAB).

Photo credit: <http://www.naplesnews.com/business/real-estate/new-construction-on-the-rise-in-immokalee-with-affordable-rentals-and-higher-end-homes-for-sale-32fd-380043831.html>

## Introduction

Immokalee is a distinctive community in eastern Collier County, with a diverse population and a strong agricultural base. Immokalee's populations swells with migrant farmworkers on a seasonal basis, but is also a permanent home for many families. For many decades, improving the community's housing and working conditions have been ongoing concerns. In recent years, Immokalee residents and other stakeholders have worked together to improve the quality of life in their community, making improvements to homes and public infrastructure, campaigning for higher wages, and fostering cultural activities and support services.

In many ways these efforts have paid off, but Immokalee continues to have a high poverty rate (43% in 2014), and many residents struggle to maintain affordable and adequate housing. A persistent weakness of the multitude of plans, initiatives, and redevelopment efforts in Immokalee is their lack of coordination with one another.

In 2015, Collier County's Community and Human Services (CHS) division successfully applied to the National Association for Latino Community Asset Builders (NALCAB) for Rural Capacity Building technical assistance to support its efforts to improve Immokalee's affordable housing delivery system. The purpose of the Rural Capacity Building Technical Assistance program, sponsored by the U.S. Department of Housing and Urban Development (HUD), is to strengthen the capacity of public, private, and nonprofit institutions that engage in rural affordable housing and community redevelopment efforts. In addition to helping rural stakeholders improve in their own respective roles, this technical assistance program is designed to help these stakeholders *function together* more effectively.

NALCAB partnered with the Florida Housing Coalition (the Coalition) to provide direct technical assistance to CHS staff and their partners under the Rural Capacity Building Technical Assistance grant. Between September 2015 and April 2016, Coalition staff met with numerous stakeholders and collected extensive data to identify strengths and gaps in local efforts to provide affordable housing opportunities in Immokalee. This report summarizes the findings and outcomes of the Coalition's technical assistance activities in Immokalee, and consists of the following five sections:

### **I: Housing Needs Assessment**

This section examines the nature and extent of housing-related hardships among Immokalee's low-income households, identifies current and projected gaps between affordable housing supply and demand, and assesses the potential affordable housing market for Immokalee's professional workforce.

### **II: Community Input**

This section provides an overview of the public and private organizations involved in affordable housing development in Immokalee, identifies stakeholder concerns about roadblocks in Collier County, and provides recommendations for facilitating the provision of affordable housing.

### **III: Affordable Workforce Housing Workshop**

Florida Housing Coalition staff participated in the Collier County Board of County Commissioners' Affordable Workforce Housing Workshop on March 1, 2016. This section summarizes the contributions of Coalition staff and the workshop outcomes, including authorization for a Community Housing Plan.

### **IV: Impact of Land Use Policies and Regulations**

This section reviews policy documents, regulations, and enforcement practices applicable to Immokalee. Recommendations for possible updates and improved implementation are given for the Housing Element of the Collier County Growth Management Plan, the Immokalee Area Master Plan, the Immokalee Redevelopment Area Plan, the Local Housing Assistance Plan for State Housing Initiatives Partnership (SHIP) funds, and the Collier County Land Development Code. Additionally, this section includes recommendations for improving code enforcement in Immokalee and obtaining land for affordable housing development.

### **V: Strengthening Collier County's SHIP Program**

Coalition staff assisted Collier County with improving its State Housing Initiatives Partnership (SHIP) program. SHIP is funded by documentary stamp taxes that are collected by the State of Florida and deposited in the Sadowski State Housing Trust Fund. On an annual basis, every County and large City in Florida receives a SHIP allocation based on its population<sup>1</sup>. This section briefly summarizes the assistance provided and highlights the importance of SHIP program improvements to affordable housing efforts in Immokalee.

This report is intended to provide data and guidelines for the CHS Division, other County departments involved in affordable housing production, elected officials, nonprofit and for-profit affordable housing developers, and other stakeholders with an interest in improving Immokalee's housing supply and overall quality of life. In addition to quantifying Immokalee's housing needs and identifying current and potential affordable housing providers, we sought to identify steps in the affordable housing delivery system where greater communication, clarity, or efficiency is needed. Our hope is that this document will serve as a blueprint for a more coordinated and effective approach to improving Immokalee's housing and community assets.

---

<sup>1</sup> The amount of the allocations for Counties and Cities depends on the extent to which the Florida Legislature appropriates the Housing Trust Fund money for its intended purpose. Between Fiscal Years 2009-10 and 2013-14, the Florida Legislature swept most of the Housing Trust Fund money into general revenue.

## Section I: Housing Needs Assessment

Immokalee has been the subject of numerous initiatives to improve housing conditions, develop community assets, and expand the local economy. These initiatives have borne some fruit, including infrastructure improvements, expanded cultural and youth enrichment programs, and substantial improvements in the local housing stock. Nonetheless, many of Immokalee's low-income households continue to suffer from housing cost burden, residential crowding, and other housing-related problems.

This Housing Needs Assessment (HNA) provides quantitative data on the nature of housing-related hardships among Immokalee households, particularly those with low incomes. The HNA compares Immokalee's housing needs to the existing supply of affordable housing, and describes the disconnect between housing supply and what residents are able to afford. The HNA also discusses the potential to develop workforce housing for low- and moderate-income individuals who currently work in Immokalee but live elsewhere.

### Overview of Housing Problems

Experts generally consider housing to be affordable if it costs no more than 30% of a household's income, and households who pay more than this amount are considered "housing cost burdened". This is not a perfect benchmark, since it is applied equally at all income levels. However, it is a reasonable standard for lower income households. More conservative analyses of housing affordability focus on households that are "severely cost burdened", or paying more than 50% of their incomes for housing. This Housing Needs Assessment focuses on cost burden and other housing problems among households that are "low-income", meaning that their annual income is no more than 80% of the median income for a household of their size. (See the Glossary of Affordable Housing Terms on p. 6.)

Cost burden and other housing problems among low-income households in Immokalee and Collier County as a whole are summarized in Figure 1. This information comes from the most recent Comprehensive Housing Affordability Strategy (CHAS) dataset provided by the U.S. Department of Housing and Urban Development (HUD). The CHAS data provides data on "regular" housing units, and does not include dormitories, group homes, nursing homes, or other types of group quarters. CHAS data on housing problems other than cost burden is limited, including only overcrowding and incomplete plumbing and kitchen facilities (see Glossary).

In Collier County, 37% of households are low-income, and approximately two-thirds of low-income households are cost burdened. A small percentage of low-income households in Collier County are not cost burdened but do experience other housing problems. The patterns of income, cost burden, and other housing problems in Collier County are similar to the patterns among households in the State of Florida as a whole.

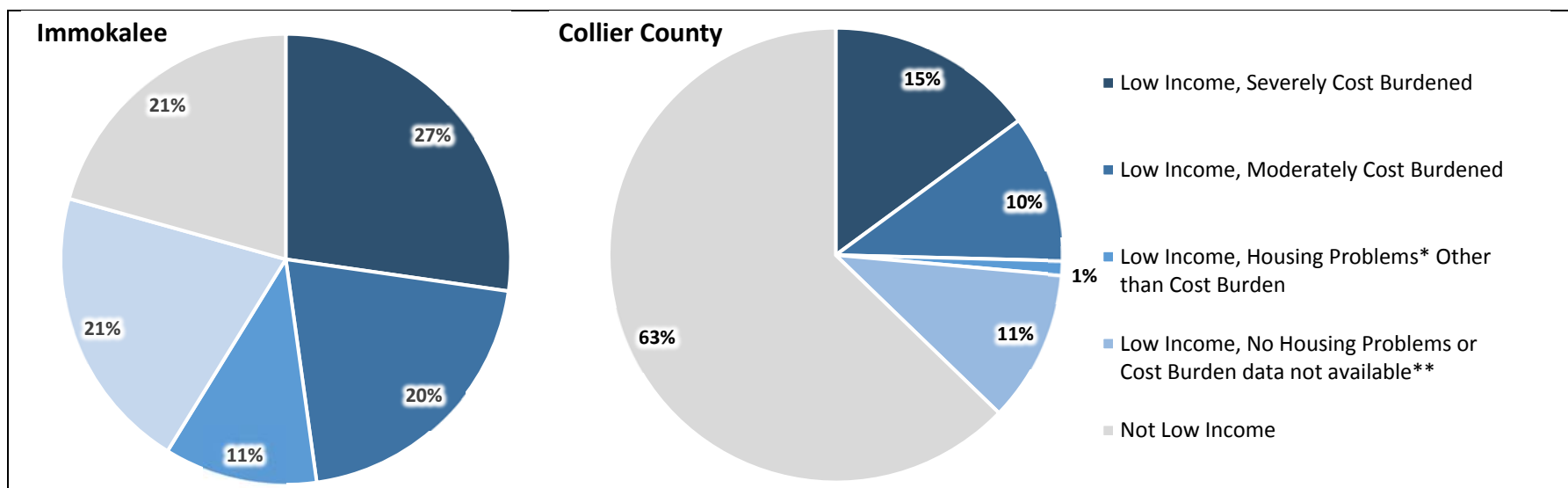
Immokalee's households, however, have a very different pattern for income and housing problems. Most Immokalee households (79%) are low-income, and the overall percentage of households with housing

problems is larger than in Collier County as a whole (58% compared to 26%). Low-income households in Immokalee are somewhat less likely to be cost burdened, but they are more likely to be overcrowded or have incomplete kitchen or plumbing facilities.

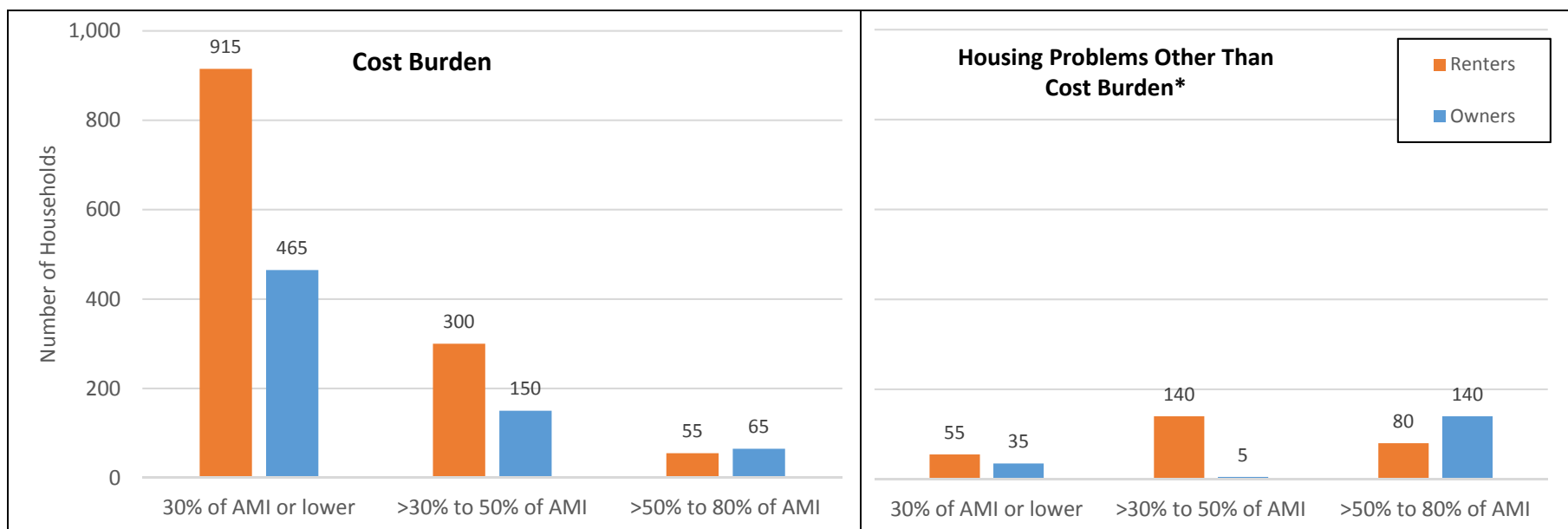
GLOSSARY of AFFORDABLE HOUSING TERMS	
•	<b>Area Median Income (AMI):</b> Median annual household income (pre-tax) for a metropolitan area, subarea of a metropolitan area, or non-metropolitan county.
•	<b>Moderate-Income:</b> Household is at or below 120% of AMI for a household of their size.
•	<b>Low-Income (LI):</b> Household is at or below 80% of AMI for a household of their size.
•	<b>Very Low-Income (VLI):</b> Household is at or below 50% of AMI for a household of their size.
•	<b>Extremely Low-Income (ELI):</b> Household is at or below 30% of AMI for a household of their size.
•	<b>Housing Costs:</b> Includes the household's rent or mortgage payments, utility payments, property taxes, insurance, and mobile home or condominium fees, as applicable.
•	<b>Affordable Housing:</b> Housing that costs no more than 30% of a household's gross income.
•	<b>Cost Burdened:</b> Household pays >30% of its gross income on housing costs.
•	<b>Moderately Cost Burdened:</b> Household pays >30% but no more than 50% of its gross income on housing costs.
•	<b>Severely Cost Burdened:</b> Household pays >50% of its gross income on housing costs.
•	<b>Moderate Overcrowding:</b> Housing unit has >1 but no more than 1.5 persons per room (excluding bathrooms, closets, utility rooms etc.)
•	<b>Severe Overcrowding:</b> Housing unit has >1.5 persons per room (excluding bathrooms, closets, utility rooms etc.)
•	<b>Incomplete Plumbing or Kitchen Facilities:</b> Housing unit lacks a kitchen sink, refrigerator, cooking equipment, hot or cold piped water, a flush toilet, or a bathtub or shower for the exclusive use of the unit.

To understand housing needs in Immokalee, we also need to consider the absolute numbers of households that have housing problems. Since a disproportionate share of Immokalee households are Extremely Low Income (ELI), they comprise most of the community's cost burdened households. The left chart in Figure 2 shows cost burdened households by income bracket and tenure (i.e. renter versus owner), and 1,380 of Immokalee's 1,955 low-income, cost burdened households are ELI. Most of Immokalee's ELI cost burdened households are renters (915 households). The 30.01% to 50% AMI bracket also has more cost burdened renters than owners (300 compared to 150).

As the right chart in Figure 2 shows, a relatively small number of low-income households are not cost burdened but do suffer from other housing problems—overcrowding or incomplete plumbing or kitchen facilities. Data on all households that have “other” housing problems—including households that are also cost burdened—is shown in Appendix A. Over 1,000 households are moderately or severely overcrowded, while fewer than 50 households lack complete plumbing or kitchen facilities. Moderate overcrowding is about three times more common than severe overcrowding. While overcrowding is more common at lower income brackets, 175 households over 80% AMI are crowded.



**Figure 1. Summary of Cost Burden and Other Housing Problems in Immokalee and Collier County.** (Source: HUD CHAS 2008-2012)

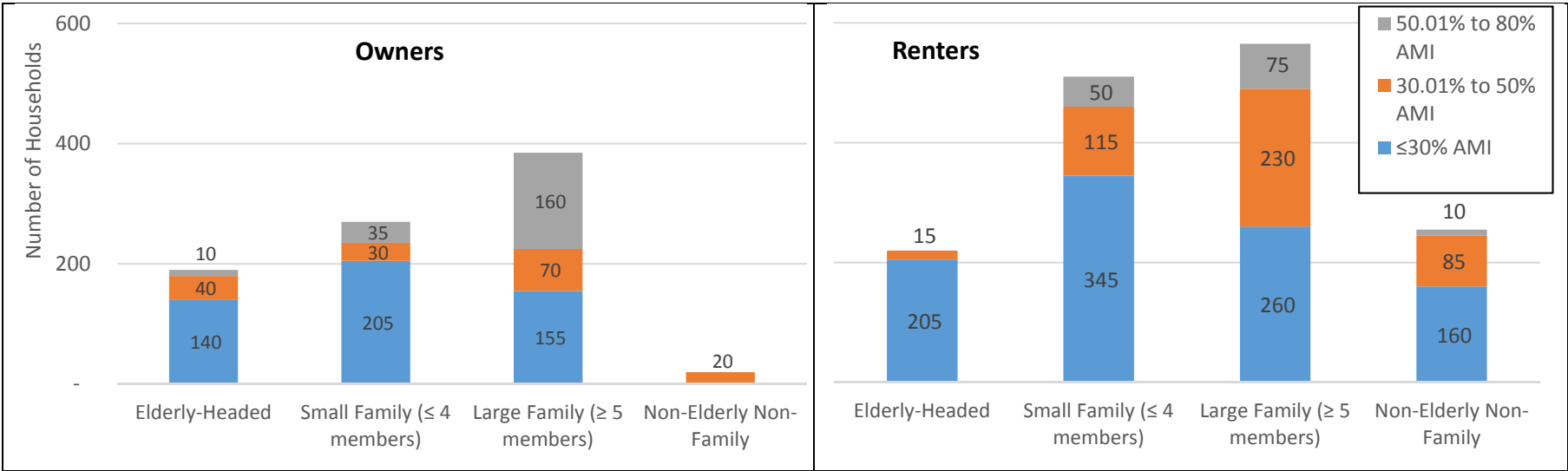


**Figure 2. Number of Immokalee Households with Housing Problems by Income Bracket and Tenure.** (Source: HUD CHAS 2008-2012)

**Notes on Figures 1 and 2:**

\*Housing problems other than cost burden include overcrowding and incomplete kitchen or plumbing facilities. Some cost burdened households may also be overcrowded or lack complete plumbing or kitchen facilities, but they are included in the counts of households with “housing problems other than cost burden”.

\*\*In Immokalee and Collier County, cost burden data is unavailable for 2% or fewer of households.



**Figure 3. Housing Problems\* by Household Type in Immokalee.** (Source: HUD CHAS 2008-2012)

\*Housing problems include cost burden, overcrowding, and incomplete kitchen or plumbing facilities.



Overcrowding is an important indicator of housing-related hardships, since crowded living conditions have been linked to problems like illness and impaired school performance in children<sup>1,2,3</sup>. However, conditions that many Americans consider “crowded” are accepted in certain cultures, including many Hispanic and Latino cultures<sup>4</sup>. These cultural differences highlight the need for affordable housing developers and their partners to understand the preferences of their target market before building new units with the intention of alleviating overcrowding.

## Housing Problems by Household Type

An ongoing concern in Immokalee is the living conditions of farmworkers who room together in substandard mobile homes during the growing season. Some of these workers are undocumented immigrants, making them ineligible for many subsidized housing programs. Even among immigrant workers with documentation, a major impediment to improving living conditions is the preferences of the workers themselves. Many immigrant farmworkers are unaccompanied men who send as much money as possible back to family members in their home countries, and crowded mobile homes have lower rents than even the subsidized apartments in Immokalee<sup>5</sup>.

The Collier County government is responsible for the health, safety, and welfare of all residents, and bears considerable financial risk if the living conditions of these workers are not addressed. For example, County agencies may have to extinguish a fire or treat a disease outbreak at one of these mobile homes. As a result, the County must strike a balance between respecting the preferences of immigrant farmworkers and protecting its own interests by enforcing minimum housing standards.

In addition, the housing problems in Immokalee are not restricted to households of unrelated farmworkers. As Figure 3 shows, most low-income households with housing problems are families, which are unlikely to include the large groups of male farmworkers that rent crowded mobile homes. Immokalee also has several hundred low-income owner households and elderly-headed renter households with housing problems. Indeed, of the approximately 2,400 low-income households with housing problems in Immokalee, only 95 are non-elderly non-family renters with incomes over 30% AMI—the household type most likely to include large groups of unrelated male farmworkers.

There may be farmworkers living in elderly-headed or family households, but these household types are presumably less willing to compromise their living conditions than are unaccompanied male workers who send their earnings to families abroad. As a result, even if we assumed that all unaccompanied male farmworkers are excluded from Immokalee’s subsidized housing market, there would still be a high demand for subsidized housing.

## Other Measures of Housing Quality

A family’s housing problems can extend far beyond cost burden, overcrowding, and incomplete kitchen or plumbing facilities, but detailed data on housing quality is limited. There is no comprehensive data on

interior housing problems in Immokalee, such as mold, leaks, and vermin. However, the 2011 *Housing Condition Inventory*<sup>6</sup>, sponsored by the Immokalee Community Redevelopment Agency and the Immokalee Housing Collaboration, provides detailed data on the exterior conditions of Immokalee's housing stock. The *Inventory* was an update of a similar study performed in 2004. Both the 2004 and 2011 studies used the following definitions for housing conditions:

- **Standard:** No visual defects, or slight defects that can be corrected during the course of regular maintenance. Structure provides safe and adequate shelter<sup>b</sup>.
- **Substandard:** Minor defects requiring more repair than would be provided during regular maintenance. Structure provides safe and adequate shelter.
- **Deteriorated:** Major defects requiring extensive repairs. Structure will not provide safe and adequate shelter unless repairs are made.
- **Dilapidated:** Does not provide safe and adequate shelter in present condition and endangers health, safety, and well-being of occupants. Structure cannot be economically repaired. Repair costs would exceed 50% of the total value of the shelter.

**Table 1. Immokalee Housing Conditions in 2004 and 2011.**

Condition Type	2004		2011	
	Number	% of Units	Number	% of Units
Standard	2,725	77%	6,053	97%
Substandard	427	12%	133	2%
Deteriorated	287	8%	63	1%
Dilapidated	119	3%	19	0%
<b>All</b>	<b>3,558</b>	<b>100%</b>	<b>6,268</b>	<b>100%</b>

(Source: *Housing Condition Inventory* 2011)

The 2011 *Housing Condition Inventory* found that the number of substandard, deteriorated, and dilapidated housing units in Immokalee had declined since 2004, even as the total number of housing units nearly doubled (Table 1). The authors attributed these improvements to increased code

enforcement, requirements for mobile home park owners to make site improvements, new construction of subsidized and market-rate housing units, and efforts by local nonprofits to rehabilitate substandard housing. They did find that 19% of Immokalee's housing units need roof repairs, and encouraged stakeholders to help property owners finance these repairs.

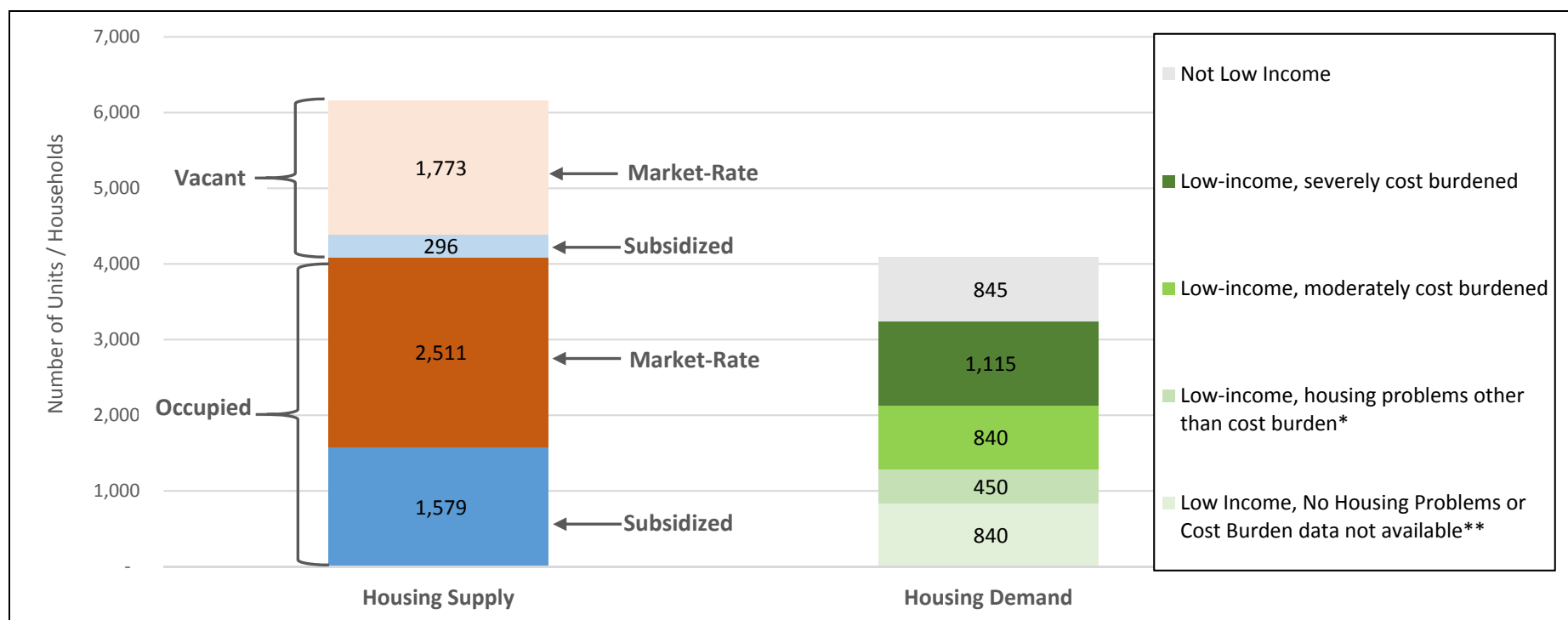
Table 2 shows housing conditions among the most prevalent housing types, including single-family homes, mobile homes, and multifamily units. Single-family units comprise 36% of all housing units in Immokalee, a larger share than any other housing type, and account for roughly one-third of Immokalee's substandard, deteriorated, and dilapidated units. Mobile homes comprise only 13% of Immokalee's housing units, but account for nearly half of the units below standard condition. Only three multifamily

<sup>b</sup> The Standard category included two tiers: "Standard" (no visual defects) and "Standard M" (slight defects). Data for the two tiers has been combined in this HNA.

**Table 2. Conditions of Major Housing Unit Types in Immokalee.**

Condition Type	Number of Units (All Types)	Single Family		Mobile Home		Multifamily ( < 10 Units)		Multifamily ( ≥ 10 Units)		Mobile Home Park	
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Standard	6,053	2,173	36%	713	12%	398	7%	911	15%	710	12%
Substandard	133	47	35%	64	48%	12	9%	0	0%	11	8%
Deteriorated	63	18	29%	25	40%	2	3%	1	2%	17	27%
Dilapidated	19	7	37%	11	58%	0	0%	0	0%	1	5%
<b>All</b>	<b>6268</b>	<b>2,245</b>	<b>36%</b>	<b>813</b>	<b>13%</b>	<b>412</b>	<b>7%</b>	<b>912</b>	<b>15%</b>	<b>739</b>	<b>12%</b>

(Source: Immokalee Housing Condition Inventory 2011)



**Figure 4. Housing Supply and Demand for Low-Income Immokalee Households with Housing Problems.** (Source: American Community Survey 2012 5-year estimates, Collier County Housing Authority 2015<sup>7</sup>, Florida Housing Finance Corporation 2013<sup>8</sup>, HUD CHAS 2008-2012, Meridian Appraisal Group 2015a<sup>9</sup>, Shimberg Center 2015<sup>10</sup>)

units are deteriorated or dilapidated, while units in mobile home parks are overrepresented among deteriorated units.

## Affordable Housing Supply and Demand

The extent of housing problems among Immokalee's low-income households may surprise many stakeholders. Not only have extensive efforts been made to upgrade Immokalee's housing stock, but the community also has over 1,800 subsidized units—of which over 500 were added since 2000. An estimated 1,579 of these units are occupied, accounting for 38% of all occupied units. However, only about 840 low-income households (21% of all Immokalee households) are free of the housing problems documented in the CHAS data (Figure 4; see Appendix B for methodology used in Figure 4).

Some of this discrepancy is explained by the fact that Immokalee's subsidized housing stock is overwhelmingly rental (only 131 subsidized units are owner-occupied), while over one-third of low-income households with housing problems own their homes. This does *not* mean that low-income renters are less likely than low-income owners to experience housing problems—on the contrary, 78% of low-income renters have housing problems, compared to 67% of low-income owners<sup>11</sup>. However, it does suggest that low-income owners are underserved. Of the 860 low-income owner households with housing problems, half are severely cost burdened. Many of these owners would likely prefer to age in place rather than move into rental housing. Local housing providers can assist these owners with repairs and retrofits to reduce utility costs, make the homes accessible for residents with disabilities, and defray the cost of roof repair and other major renovation costs.

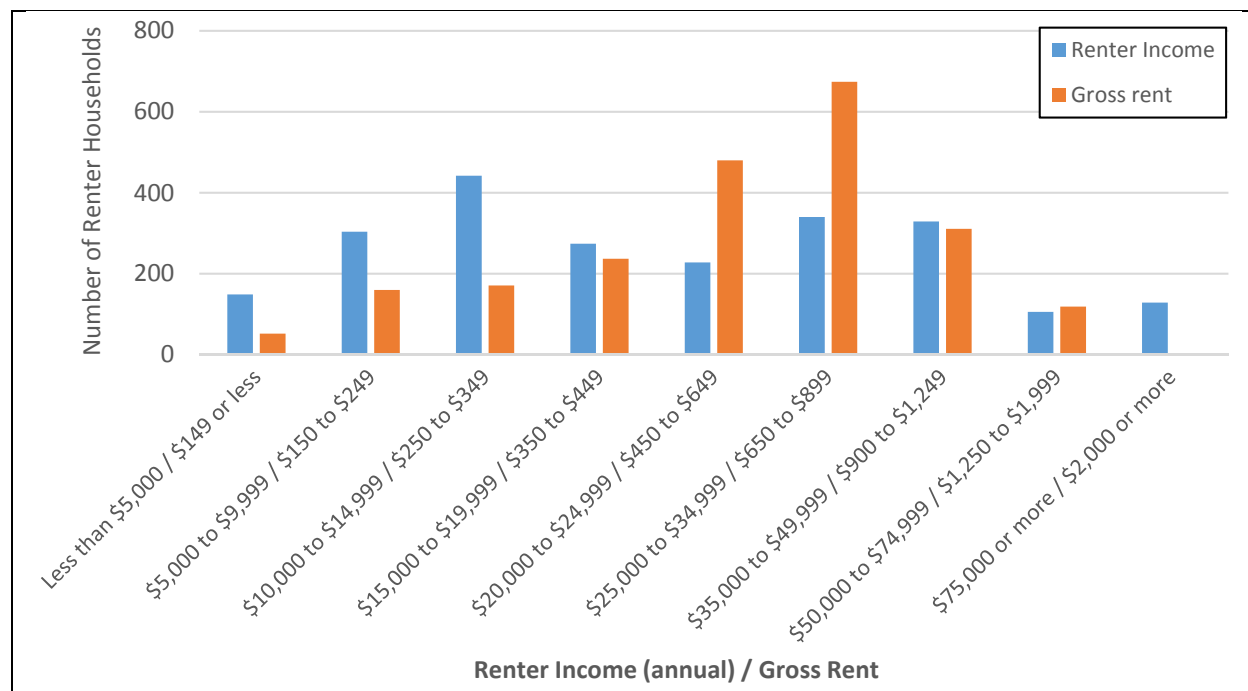
The discrepancy is also explained by the fact that not all subsidized housing residents are free of housing problems. According to a recent market study<sup>12</sup>, the average housing cost is 37% of income—within the moderately cost burdened range—for tenants in a subset of subsidized rental developments in Immokalee. In fact, nearly half of the tenants in these developments paid lower rents in their previous residences. Some of these tenants may have moved from units of much lower quality, and were willing to pay a premium for better housing. The inverse trend is also seen in Immokalee—i.e. some low-cost units are occupied by households that could afford more expensive units. Specifically, when units occupied by higher-income households are taken into account, the deficit of affordable units for ELI renters grows from 290 units to 520 units<sup>13</sup>.

Finally, the bulk of Immokalee's rental units, including many subsidized units, have monthly rents of \$400 or higher (see Appendix C), above the level that the lowest-income renters can afford. This is partly because the Low Income Housing Tax Credit, a major source of subsidy for affordable multifamily rental developments, is designed to make units affordable to households with incomes of 50% to 60% AMI.

Figure 5 compares American Community Survey data on the number of renter households by income bracket and gross rent, matched side-by-side as closely as possible. For example, a household with an income of \$10,000 to \$14,999 can afford to pay \$250 to \$375 in monthly rent, using the 30%-of-income standard. The number of renter households in this income bracket is compared to the number of renter

households with monthly rents between \$250 and \$349. This comparison shows a striking undersupply of rentals affordable to households with incomes under \$15,000, and an oversupply of rentals affordable to households with incomes between \$20,000 and \$34,999. (As a frame of reference, the maximum income for a 1-person ELI household was \$15,300 in 2012, while the >30%-50% AMI range for a 4-person household fell between \$21,850 and \$36,400<sup>14</sup>.)

These findings are in agreement with the above-mentioned market study, which found a favorable market for rental developments with deep subsidies designed to make rents affordable for ELI households. By contrast, new rental developments targeting households at 60% AMI would likely “cannibalize” occupancy from existing subsidized developments.



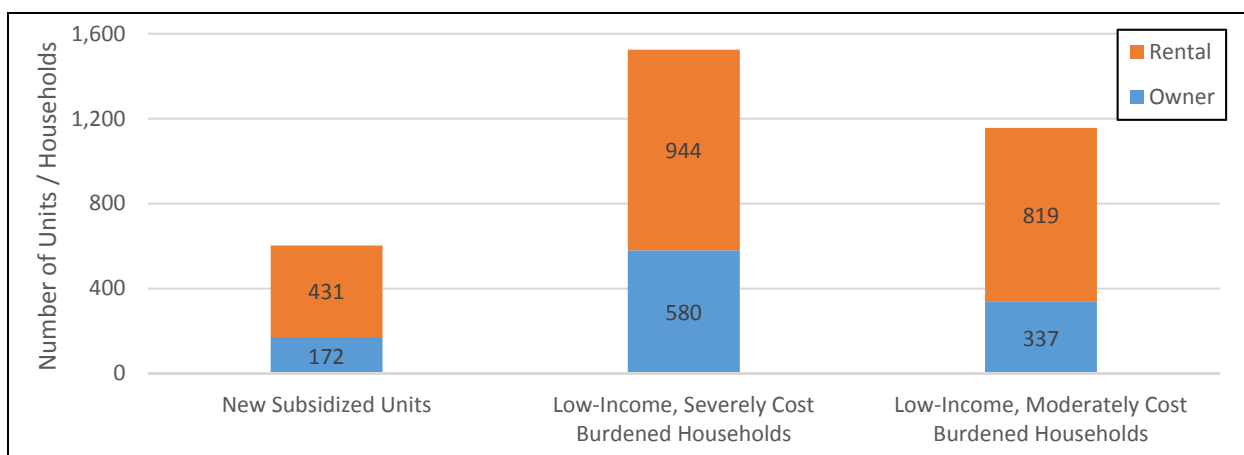
**Figure 5. Mismatch Between Supply and Demand for Low-Cost Rental Units.** (Source: ACS 2012 5-year estimates)

One critical factor is not captured in the analysis above: public perceptions of existing subsidized developments. Occupancy rates for these developments (other than the Housing Authority-owned properties) are above 90%, but are perceived to have drug, crime, and upkeep problems. These concerns should be addressed, since the success of Immokalee’s existing subsidized housing stock is essential to building political will for future affordable housing construction and rehabilitation. See Section II for further discussion.

## Future Supply and Demand

About 600 subsidized units are expected to come online in Immokalee in the next few years, but the community's population is expected to grow as well. Figure 6 shows Immokalee's projected supply and demand for affordable housing in 2020, assuming that all proposed subsidized units are completed and occupied by then (see Appendix B for methodology used in Figure 6). The 431 rental units expected to come online are insufficient to meet the needs of the projected 944 low-income, severely cost burdened renters in 2020. The gap between demand and supply for affordable rentals is even larger when we consider that some low-income, severely cost burdened owners would be in the market for affordable rentals. Most of these severely cost burdened owners are ELI, and would probably not be in a financial position to buy a new home—especially since the proposed homes would be sold at price points for households above 50% AMI.

The most likely market for the 172 new owner units consists of low-income, moderately cost burdened renters. With 819 households in this category, the demand for affordable homes for sale exceeds the supply by nearly 650 households. The supply of affordable homes for sale may be increased if Arrowhead Landings, a Planned Unit Development (PUD) expected to produce up to 1,245 units, successfully incorporates homes with sale prices affordable to low-income buyers.



**Figure 6. 2020 Projected Supply and Demand of Subsidized Housing Units in Immokalee.** (Source: ACS 5-year estimates 2011 to 2014, Decennial Census estimates 2000 and 2010, Collier County Housing Authority 2015, HUD CHAS 2008-2012, Meridian Appraisal Group 2015a, other local stakeholders)

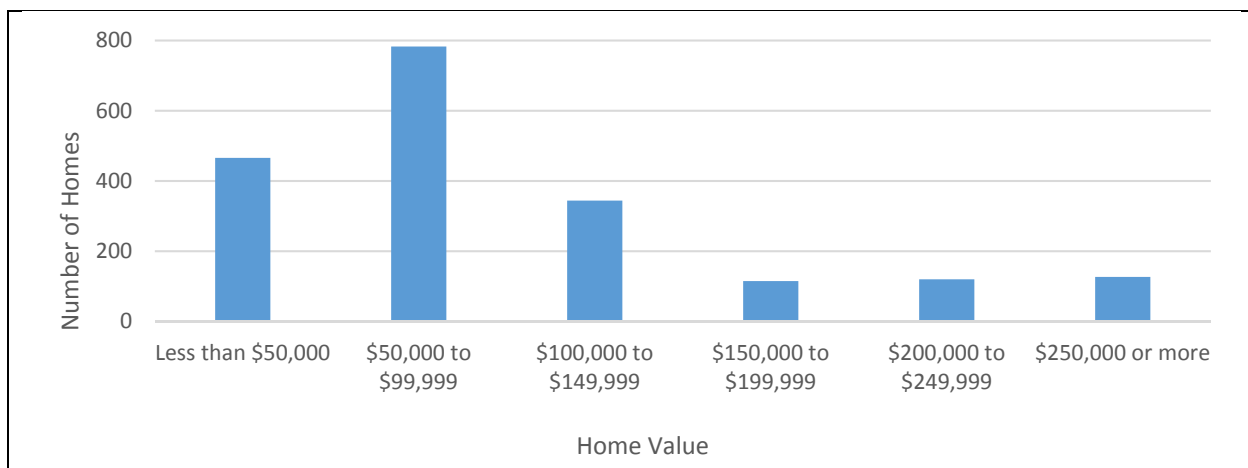
## Potential for Workforce Housing

The projection of affordable housing supply and demand above assumes that Immokalee's income composition will not change. However, local stakeholders report that Immokalee has a shortage of housing priced for moderate-income households (80-120% AMI), a perception that is borne out by the most recent available data on values of owner-occupied homes (Figure 7). Over 80% of these homes have

values below \$150,000, an affordable price for a household with an annual income of \$48,926. This income was slightly higher than 80% AMI for a family of three in 2014<sup>15</sup>.

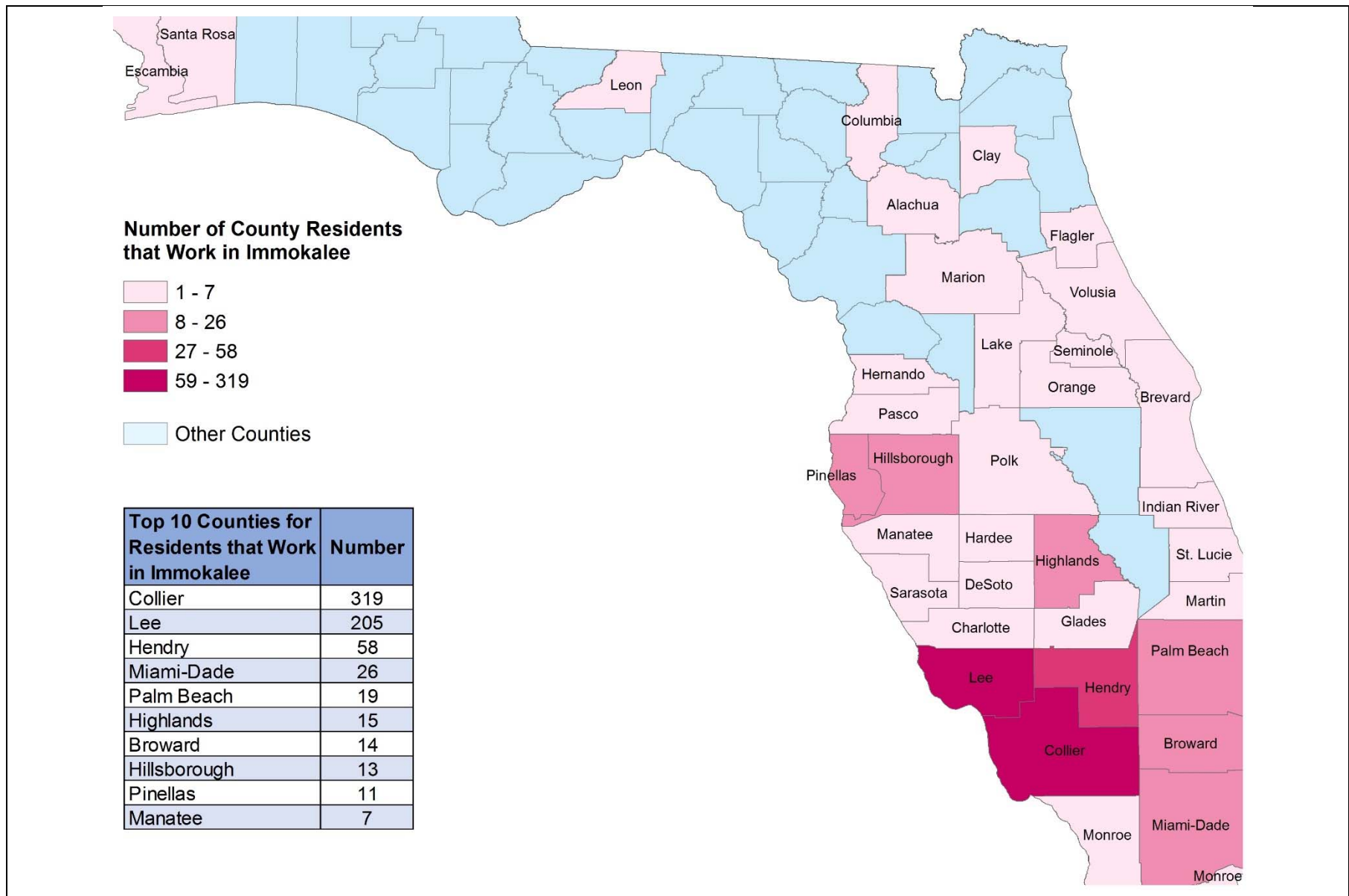
Because of this shortage, local stakeholders also report that many of Immokalee’s professional workers commute from elsewhere, particularly Lee County. To examine the commuting patterns of Immokalee’s highest-earning workers, we used the Census Bureau’s Longitudinal Employer-Household Dynamics (LEHD) data from 2013. The following two maps show home counties and Census tracts for Immokalee workers with earnings over \$3,333 per month (about \$40,000 per year).

Of the 5,648 jobs in Immokalee that are considered “primary jobs” (a worker’s highest-paying job), 786 (14%) pay over \$3,333 per month. Of these 786 workers, 467 (nearly 60%) live outside Collier County. Consistent with the input of local stakeholders, Lee County is the most common county other than Collier where these workers live (see Figure 8). It is not unusual for a substantial portion of a community’s workers—particularly the highest earners—to commute from other counties, including far-flung counties throughout the state. However, the substantial share of high-earning workers who commute to Immokalee from other counties suggests a potential demand for workforce housing in Immokalee. Most notably, dozens of Immokalee’s high-earning workers commute from the high-cost counties of Pinellas, Hillsborough, Palm Beach, Broward, and Miami-Dade.



**Figure 7. Values of Owner-Occupied Homes in Immokalee.** (Source: ACS 2014 5-year estimates)

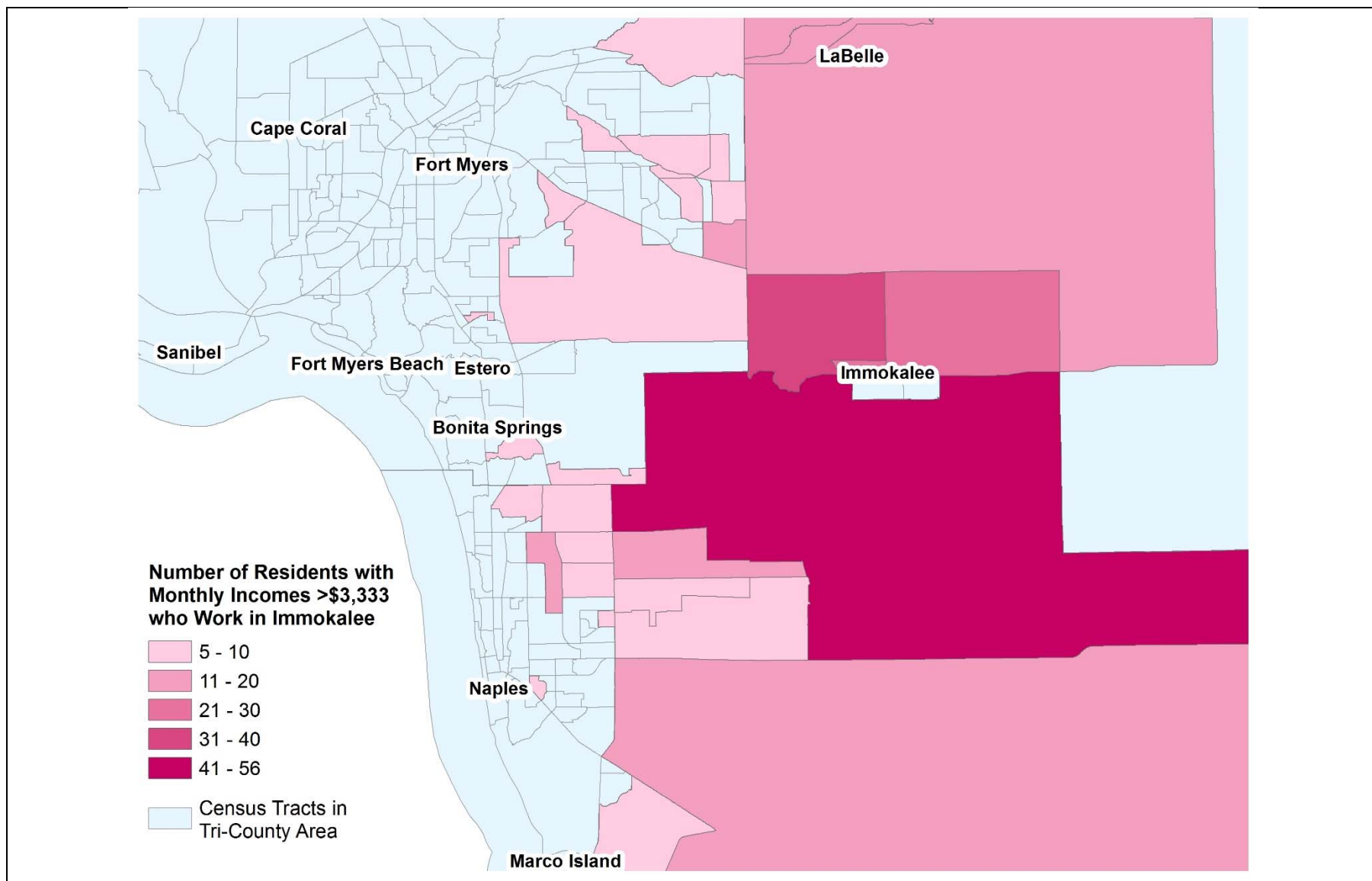
Figure 9 shows the home Census tracts for the highest-earning Immokalee workers who live in the Collier-Lee-Hendry tri-county area. Most of these workers live in large Census tracts that include parts of Immokalee. The Census tract where the highest number of high-earning Immokalee workers live is the large one that includes the southernmost part of Immokalee, Ave Maria, Harker, Orangetree, and parts of the numbered streets north of East Golden Gate Boulevard. The workers who live relatively close to Immokalee may not be easily enticed to move to the community core, unless workforce housing development in Immokalee offers them substantially lower housing costs. It may be easier to attract professional workers who live further away from Immokalee, since a move closer to their workplaces would allow them to save transportation time and costs. (For example, a commute from Gateway in Lee County is about 30 miles and nearly 40 minutes.)



**Figure 8. Home Counties of Highest-Earning Immokalee Workers\*.** (Source: Longitudinal Employer-Household Dynamics [LEHD] 2013)

\*Primary Jobs





**Figure 9. Home Census Tracts of Immokalee's Highest-Earning Workers\* in the Tri-County Area.** (Source: LEHD 2013)

\*Primary jobs

One issue that has plagued Collier County’s efforts to expand “workforce housing” and “affordable housing” in Immokalee area is a lack of a clear definitions for these terms, as well as a lack of specificity in agreements between the County and some developers of subdivisions that are slated to include affordable housing. Section II describes this issue in more detail.

## Summary

- Compared to Collier County and the state as a whole, Immokalee has a distinctive profile. It is a primarily low-income community with widespread housing problems, including housing cost burden and overcrowding.
- Most Immokalee households that suffer from housing cost burden or other problems are extremely low-income (ELI). Among all low-income households with housing problems, renters outnumber owners.
- Most low-income households with housing problems in Immokalee do not fit the profile of unaccompanied male farmworker households. Instead, they consist of families, elderly-headed households, and owner households.
- Housing problems persist in Immokalee despite considerable expansion and improvement of its housing stock in the last decade, including the addition of hundreds of subsidized rental units. This paradox is primarily due to a shortage of units with deep subsidies for ELI households. Affordable housing developments that are in the pipeline or planning stages will narrow this gap, but will not eliminate it.
- There is widespread interest in expanding “workforce housing” for low- and moderate-income professionals who work in Immokalee. Commuting data confirms that hundreds of Immokalee’s highest-earning workers live outside Immokalee, some traveling from as far away as the high-cost Tampa Bay and Gold Coast regions.

## Recommendations

**RECOMMENDATION #1:** Develop and maintain a robust system for renovating Immokalee’s existing housing units. This strategy would help owners and renters on fixed incomes reduce the utility portion of their housing costs; allow elders and people with disabilities to make their homes accessible and age in place; address exterior maintenance needs documented by the 2011 *Housing Condition Inventory* (particularly roof repairs); and address interior health and safety improvement needs that are not captured in available data.

The following actions would support a strong rehabilitation program in Immokalee:

- In the Owner-Occupied Rehabilitation, Rental Rehabilitation, and Rental Acquisition strategies included in Collier County's Local Housing Assistance Plan (LHAP) outlining the use of SHIP funds, include a funding preference for properties in Immokalee.
- Use the *Housing Condition Inventory* to identify the most dilapidated or deteriorated units in Immokalee, and prioritize these units for rehabilitation assistance.
- Enlist the assistance of Code Enforcement to address deficiencies and identify homes that would be suitable for owner-occupied home repair programs.
- Disseminate information among Immokalee residents and stakeholders about the County's existing home rehabilitation programs. In particular, the County should assertively advertise the fact that the Growth Management Department holds office hours in Immokalee.
- Assign a dedicated staff person to Immokalee at the 7th Avenue Building or another convenient location to provide assistance to residents seeking home repair or other housing-related information.
- Distribute brochures, applications, and other marketing materials about the County's housing programs at community centers, social service organizations, employment assistance centers, faith-based organizations, and other locations within Immokalee.
- Increase engagement with stakeholders by regularly attending Immokalee Interagency Council meetings and other relevant community meetings.

**RECOMMENDATION #2:** In addition to SHIP funds, several other funding sources and initiatives could be used to support home rehabilitation in Immokalee:

- The Weatherization Assistance Program (WAP) is a block grant from the U.S. Department of Energy that funds home energy efficiency improvements for households with incomes up to 200% of the federal poverty level. WAP is administered in Florida by the Department of Economic Opportunity, which provides grants to local governments, community action agencies, and nonprofits to administer to qualified households. More information may be found at the following link: <http://www.floridajobs.org/community-planning-and-development/community-services/weatherization-assistance-program>.
- The County should explore additional leveraging for rehabilitation which can be provided through:
  - Property Assisted Clean Energy (PACE) program: <http://www.pacenation.us/pace-programs/>
  - Florida Division of Emergency Management's Residential Construction Mitigation Program: <http://www.floridadisaster.org/mitigation/RCMP/index.htm>

- Some Habitat for Humanity affiliates provide home repair services to low-income families. The County may be able to encourage the local Habitat affiliate to offer home repair assistance.
- The County and local nonprofit rehabilitation providers could contact national corporations such as Home Depot and Lowe's to provide sponsorships in the form of direct financial assistance or in-kind donations. Additionally, both Home Depot and Lowe's offer competitive grants on a regular basis. The County and its partners could also work with local employers to provide cash, in-kind, or volunteer assistance for rehabilitation activities.
- A model organization for amassing corporate donations and volunteer labor for home repair is Rebuilding Together, which has affiliates throughout the nation. The County could encourage the formation of a Rebuilding Together affiliate in Southwest Florida, possibly with the assistance of neighboring counties.

**RECOMMENDATION #3:** Prioritize County Federal funding to Immokalee by designating Immokalee as a target geography within the Consolidated Plan for Community Development Block Grant (CDBG) and HOME funds received from HUD.

**RECOMMENDATION #4:** Efforts to expand Immokalee's affordable housing stock through new construction and rehabilitation should include deep subsidies for extremely low-income (ELI) households whenever possible, since these households have the highest need. Programs such as the Low Income Housing Tax Credit (LIHTC) and the State Apartment Incentive Loan (SAIL) programs are not enough by themselves to make rental units affordable to ELI households. Whenever possible, ELI rental housing developments should offer amenities that make them an attractive housing alternative to severely cost burdened ELI owners, some of whom may be unable to feasibly maintain homeownership. However, investments in deeply subsidized housing should be coordinated with local economic development strategies, which are ultimately designed to reduce the number of ELI households.

**RECOMMENDATION #5:** Ensure that affordable housing developers know how to access all Florida Housing Finance Corporation (FHFC) programs. These funds are available through a competitive Request for Application Process (RFA) posted on [www.floridahousing.org](http://www.floridahousing.org). County staff should sign up for announcements on the FHFC WebBoard and encourage interested developers to do the same.

**RECOMMENDATION #6:** Ensure that local developers, realtors, and lenders are aware of all the down payment assistance options available for low- and moderate-income buyers of affordable homes, including:

- Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) funds

- Florida Housing Finance Corporation Single Family Bond assistance
- Mortgage Credit Certificates

**RECOMMENDATION #7:** Ensure that affordable housing developers are aware of training and technical assistance through the Florida Housing Finance Corporation’s Catalyst program as well as national training opportunities.

**RECOMMENDATION #8:** Low-income, moderately cost burdened renter households should be targeted for efforts to increase homeownership in Immokalee. Appropriate strategies may include creating new affordable units through new construction and rehabilitation, as well as providing purchase assistance and homebuyer counseling. To market these programs, the County should partner with organizations that already provide services to these households to distribute flyers, conduct social media campaigns, and host community events for prospective homebuyers. Additionally, County representatives should attend meetings and events held by Rural Neighborhoods, the Immokalee Interagency Council, and other local organizations to make announcements about options for low- and moderate-income first-time homebuyers.

**RECOMMENDATION #9:** Develop “workforce housing” priced for low- and moderate-income professional workers who commute to Immokalee from elsewhere. Since Immokalee has fewer amenities than coastal Collier County or Lee County to attract professionals, a pilot project would be wiser than massive workforce housing development in the near term. This strategy could be expressed as “build a little bit and see if they come.” Marketing for a workforce housing pilot should be focused on households with long commutes, particularly those from high-cost areas of the state.

**RECOMMENDATION #10:** Even on a pilot basis, a workforce housing development in Immokalee should not be undertaken without conducting a market study first. The County should commission, provide financial support for, or otherwise support a market study, which should:

- Identify the number of potential buyers in the income bands targeted by the homes to be constructed.
- Obtain information from local realtors on the supply of existing homes for sale at prices affordable to these income bands, and the amount of time that these homes stay on the market before being purchased. (For example, if the existing homes in good condition are on the market for a relatively long time before being purchased, it would indicate weak demand for homes affordable to these income bands.)
- Work with local employers to identify professional employees in the “workforce” income range, and conduct focus groups and surveys with these employees to determine the circumstances in which they would consider buying a home in Immokalee.

- Obtain feedback from the sales department of the Ave Maria development on the factors of the development (e.g. design features of the houses, neighborhood amenities, location) that entice low- and moderate-income professional households to buy homes there, as opposed to elsewhere.

If the market study shows potential demand for workforce housing in Immokalee, one of the County's developer partners should construct a "spec home" based on feedback about the design features desired by workforce homebuyers in the area. Additionally, the County should work with local developers to identify the incentives or funding sources, if any, that they need to make the workforce homes affordable, aside from what the County already offers.

To increase market demand for these homes, a workforce housing strategy should be coordinated with local strategies to develop Immokalee's cultural and economic life, to help make Immokalee an attractive and enticing community for low- and moderate-income professionals.

## Section II: Community Input

The Housing Needs Assessment in Section I detailed substantial affordable housing needs in Immokalee, as well as the gap between projected demand and supply. In an effort to supplement the HNA data with first-hand perspectives and explore options for closing the demand-supply gap, Florida Housing Coalition staff surveyed community organizations and housing developers in Collier County about Immokalee's housing needs and the capacity of developers capable of producing additional units. Since there are few qualified affordable housing developers working in the Immokalee area, our goal was to identify existing organizations in the Immokalee area that would be willing to expand their business line to include housing development. We also sought to identify qualified developers that are not currently working in Immokalee but would be willing to do so. Additionally, we surveyed nonprofit organizations that had previously developed affordable housing in the area, in an effort to better understand existing impediments to housing development and obtain feedback and recommendations for improvement.

In November and December 2015, we interviewed staff from the following organizations and gathered input regarding the quality and availability of housing in Immokalee:

- Rural Neighborhoods
- Habitat for Humanity of Collier County
- Housing Development Corporation of Southwest Florida
- Affordable Homeownership Foundation
- Collier County United Way (host of Workforce Housing Summit, October 1, 2015)
- Lee County Housing Development Corporation
- Guadalupe Social Services/Catholic Charities
- Collier County Hungry and Homeless Coalition
- Community Assisted and Supported Living
- Collier County Housing Authority
- Immokalee Housing and Family Services
- Florida Community Bank

### Nonprofit Affordable Housing Developers

The only nonprofits actively involved in new affordable housing development in Immokalee are Rural Neighborhoods and Habitat for Humanity.

**Rural Neighborhoods** is an experienced developer with strong ties to the Immokalee Community. In the past few years, other housing development organizations have either disbanded or been absorbed by Rural Neighborhoods. The organization owns and operates several affordable rental developments in the area as well as land slated for future development. Rural Neighborhoods is also spearheading the Eden Park-Esperanza project. This initiative will bring stakeholders and residents together to improve the

community through infrastructure improvements (e.g. parks and lighting) and neighborhood programs for youth and adults.

**Habitat for Humanity of Collier County** is actively developing single family homes for sale to low income buyers in both Immokalee and in Naples, as well as providing homebuyer education courses. This Habitat affiliate, one of the nation's oldest, is a capable organization with an excellent reputation.

We identified four existing nonprofits that have not previously worked in Collier County, but have indicated a willingness to enter the Immokalee market should the County provide reasonable incentives.

1. **Lee County Housing and Development Corporation (LCHDC)** has experience with single family acquisition, renovation, and resale; community land trusts; rental development; homebuyer counseling; and foreclosure prevention. LCHDC has administered funds from HUD's Neighborhood Stabilization Program (NSP) and the HOME program, the State Housing Initiatives Partnership (SHIP) program, the Federal Home Loan Bank of Atlanta's Affordable Housing Program (AHP), and the Hardest Hit Fund (HHF).

Contact: Erika Cooke, Executive Director, (239) 275-5105 ext. 102

2. **Affordable Homeownership Foundation**, based in Lee County, has experience in developing small rental developments as well as single family homes. This organization also provides credit counseling, homebuyer education and foreclosure counseling.

Contact: Lois Healy, Executive Director, (239) 689-4944

3. **Catholic Charities, Diocese of Venice**, is an experienced developer of affordable rental housing in Southwest Florida. This Catholic Charities member agency operates Guadalupe Social Services in Immokalee, and may consider developing affordable units on the parcel where Guadalupe Social Services is located.

Contact: Peter Routsis-Arroyo, CEO, (941) 488-5581

4. **Community Assisted and Supported Living (CASL)**, an experienced developer of housing for special needs populations, expressed interest in developing additional units in Immokalee should funding become available.

Contact: Todd Abbott, Director of Housing and Community Outreach (941) 916-9621

**RECOMMENDATION #11:** The County would benefit from having additional affordable housing developers in the area, especially those that focus on rental and ownership development for demographics not served by Rural Neighborhoods and Habitat for Humanity of Collier County. Underserved demographics include



special needs households, renters and homebuyers between 60% and 140% AMI, and Extremely Low-Income (ELI) renters.

The County is encouraged to actively foster relationships with these organizations and others that may be interested in adding housing development to their business line. We recommend that the County initiate discussions to ascertain what real and perceived barriers they feel exist in developing affordable housing. The County should ask these organizations about the tools, funding, training, strategies and incentives they would need to increase the affordable housing supply.

## Governmental Organizations

The Housing Authority of Collier County (HA) currently has 591 affordable housing units and one 192-bed dormitory for unaccompanied farmworkers. Notably, the HA has just finalized a \$9.2 million USDA grant to rehabilitate 315 units in its portfolio. A summary of the Housing Authority's portfolio follows:

### **1. Farm Worker Village (FWV)**

This development consists of two components:

- 276 single-family units constructed with United States Department of Agriculture (USDA) funding. This funding source originally required all units to be rented to farmworkers, but the units have since been released from those guidelines. The occupancy status of these units is as follows:
  - 110 units occupied by low-income households, of which 70 have recently undergone electrical improvements with County Community Development Block Grant (CDBG) funding.
  - 50 units occupied by farmworkers. These households will move into designated USDA Rural Development (RD) farmworker units as they become available through renovation funded by the \$9.2 million USDA grant.
  - 80 units are vacant and need renovation before they can be occupied. The Housing Authority plans to renovate these units 6 at a time as funding becomes available. The renovations commenced in January 2016.
  - 36 units are vacant.
- 285 units (single-family and duplexes) designated as USDA RD farmworker units. All are scheduled to be renovated with the \$9.2 million USDA grant. The occupancy status of these units is as follows:
  - 220 units are occupied by farmworkers.
  - 65 units are vacant and will be renovated at a later date.

Rents for Farm Worker Village units are listed in Appendix C.

## **2. Collier Village**

This development has 30 units, which must be rented to farmworkers. To be considered a farmworker household, at least \$4,000 of the household's income must come from farming and the household must have legal residency. These units previously had air conditioning systems installed with State Housing Initiatives Partnership (SHIP) funds administered by the County. The units require additional minor rehabilitation, which is included in the \$9.2 million USDA grant. Rents for Collier Village are listed in Appendix C.

## **3. Horizon Dormitory**

This dormitory has 24 four-bedroom units with bunk beds housing 8 people per unit (192 beds total). This project was funded with a former Department of Community Affairs grant, Hurricane Hardness Grant, Empowerment Alliance Grant, and County SHIP loan. The infrastructure was funded by CDBG, a Community Facility Grant and SHIP. Rents are \$9 per person per day. Farmers reserve these beds during the season for A1 visa workers (October to June), but there are often cancellations. Currently only 90 beds are occupied, and it is common for beds to be vacant as the off season approaches.

**RECOMMENDATION #12:** The County is encouraged to coordinate with the HA to target funding to HA units that are currently vacant and lack designated funding for future repairs. The County should determine why the HA did not apply for funding during a recent round of solicitations, and should assist the HA as needed to overcome any barriers that may have prevented them from applying.

Since this proposed repair effort has the potential to return a large number of affordable units to the rental market, the County may consider structuring a competitive funding proposal that contains a preference for larger projects and/or rental housing in Immokalee.

The Request for Proposal or Request for Application process can be driven by the County to target funds to areas of greatest need. Data from the Consolidated Plan should be used to support such targeting.

## **For-Profit Developers**

**Florida Star Development** is interested in developing the Arrowhead site, a 300-acre Planned Unit Development (PUD) immediately to the west of Crestview Park Apartments. Of the 1,245 planned units, 186 are set aside for households at or below 80% AMI. These affordable housing commitments were not made pursuant to the County's Affordable Housing Density Bonus (AHDB) program. Two issues have arisen regarding these commitments:

- Ordinance 2005-13, which added the affordability commitments to the PUD agreement, does not clearly state how many affordable units will be owner-occupied and how many will be rentals. It merely states that “each affordable housing unit in Phase 1 of Tract 2 shall be restricted to remain and be maintained as an affordable housing rental unit,” implying that additional units of either tenure type might be included in a subsequent phase of Tract 2. A Staff report prepared by the Department of Zoning and Land Development Review for a June 5, 2008 Board of County Commissioners hearing does not clarify this issue.
- In the absence of an Affordable Housing Density Bonus to subsidize the construction of the affordable units, Florida Star Development is uncertain if they will be able to break even on the construction and sale of the affordable units intended for homeownership. In part, the developer’s uncertainty may have stemmed from a lack of understanding of the income brackets targeted and the sale prices that are affordable for these families. For example, an affordable sale price for a family of four at 80% AMI is approximately \$160,000, but the developer was under the impression that they would have to offer the “affordable” homes at a much lower price, similar to the prices offered by Habitat for Humanity. The County has been in contact with the developer to discuss these issues, but they remain unresolved and the timeline for developing units on the site is uncertain.

An additional for-profit development known as the First Assembly Planned Unit Development (PUD), undertaken by **Lord’s Way Apartments, LLC**, is in the planning stages. The multifamily rental development will be constructed on a parcel near Lely, and will contain up to 296 units. Lord’s Way has committed to including affordable units in the PUD in return for increased density, although this agreement is not pursuant to the Affordable Housing Density Bonus ordinance. The development will include a minimum of 147 rental units for Essential Service Personnel (ESP), including teachers and other school district employees, community college and university employees, police and fire personnel, skilled building trade workers, and government employees. Of the 147 units for ESP, 25 units will be set aside for households with incomes up to 80% AMI, 35 units will be set aside for households up to 150% AMI, and the remaining 87 will be available to ESP at any income level.

The affordable housing agreement for the First Assembly PUD specifies that “For the purposes of this Agreement, the median income of the area as defined by the U.S. Department of Housing and Urban Development (HUD) shall be the then current median income for the Naples Metropolitan Statistical Area, established periodically by HUD and published in the Federal Register, as adjusted for family size.” However, the agreement does not specify the maximum rents by bedroom size for income-restricted units, due to a one-time situation where such restrictions were not permitted.

Contact: David Torres, (239) 208-4079

The Arrowhead and First Assembly PUDs are not isolated cases. The Affordable Housing Density Bonus ordinance requires developers to attend a pre-application conference with County staff, followed by a formal application specifying the number and type of units, the proposed zoning, and other details of the project (see discussion in Section IV). In many cases, PUD developers are asked to make affordable housing commitments after they have obtained PUD approval, when it is too late to use the formal AHDB process. This practice potentially results in weaker affordable housing commitments or less accountability than would have been required under the AHDB. In the coming months, CHS and other County divisions involved in development review plan to collaborate on improvements to the system for securing affordable housing commitments.

**RECOMMENDATION #13:** The County should study alternatives that would result in more widespread use of the AHDB program or comparable affordable housing commitments. These alternatives may include:

- Amending the AHDB ordinance to provide greater flexibility, allowing it to be used for developments that have already obtained PUD approval.
- Adding language to the Land Development Code requiring that affordable housing agreements formed outside the AHDB process should have certain minimum features that would have been required under the AHDB.
- Coordinating with the Development Review Division to ensure that the issue of affordable housing commitments is addressed in the preapplication stages for developers seeking PUD approval or other approvals.
- Replacing the AHDB ordinance with a mandatory inclusionary housing ordinance (see Sections III and IV).

**RECOMMENDATION #14:** In cases where a developer makes affordable housing commitments in exchange for increased density—whether pursuant to the AHDB process or through a separate process—the County should work with the developer during the crafting of the agreement to determine if monetary subsidies (from the County or another source) are needed to allow the developer to offer the income-restricted units at an affordable price. When a developer is provided with a density bonus, the proceeds from the extra units should ideally allow the developer to offer affordable units to the designated income brackets without the need for additional subsidy. However, for homebuyers with incomes substantially below the designated income bracket, down payment assistance from SHIP or other County or state programs may be needed to make the homes affordable. (See **RECOMMENDATION #6** in Section I.)

## Community Feedback

The observations below are a compilation of the thoughtful comments provided by the organizations listed above. We asked these groups if they would be interested in developing affordable housing in Immokalee. For those that were not interested, we asked about the factors that dissuaded them. We

also asked these organizations to provide recommendations to the County that would improve the affordable housing situation in Immokalee.

The issues most commonly cited by the respondents are listed below:

### **1. Affordable Housing Needs:**

- There are few homeownership opportunities for moderate-income households in Immokalee. Habitat for Humanity does an excellent job of serving households earning below 60% of Area Median Income (AMI; see Glossary of Affordable Housing Terms in Section I), but households between 60% and 120% AMI have fewer options. Households in this income bracket frequently live in Lee County and commute to Immokalee for work.
- There is a shortage of safe and decent rental units for very low-, low- and moderate-income households. The occupancy rates of many rental developments targeted to households earning less than 60% AMI are well above 90%.
- Several affordable rental properties intended for farmworkers have reported an inability to lease up units for this demographic group, and have obtained waivers from the Florida Housing Finance Corporation allowing them to serve non-farmworker families.
- All income brackets are underserved in Immokalee. Respondents expressed a need for more high-quality affordable housing for elders, people with special needs, farmworkers (especially unaccompanied workers), and low- and moderate-income households.

**RECOMMENDATION #15:** The County, when issuing Requests for Proposals, should strategically target funds to Immokalee by using the data provided during the Consolidated Planning process, including public comments and the information provided in this report. In addition, funding should be targeted to HA-owned units in Immokalee that are currently vacant and lack designated funding for repairs. The Consolidated Plan allows for designated target geographies based on data and need. (See **RECOMMENDATIONS #3** and **#12**.)

In addition, a complete neighborhood revitalization plan could be commissioned, although the County should carefully assess whether the cost of such a plan is prudent at this time.

### **2. Condition of Housing Stock**

The quality of Immokalee's housing units is an ongoing concern. In 2011, the Immokalee Community Redevelopment Agency and the Immokalee Housing Collaboration, which includes the Collier County Housing Authority, the Empowerment Alliance of Southwest Florida, I HOPE, and Immokalee Housing and Family Services, sponsored a *Housing Condition Inventory* on exterior conditions for virtually all housing units in Immokalee. As mentioned in Section I, the study found that Immokalee's housing stock has

improved dramatically since 2004. The *Inventory* did report, however, that 19% of Immokalee's housing units need roof repairs, and encouraged stakeholders to help property owners finance these repairs.

The *Inventory* results are described in more detail in Section I. Comprehensive data on the interior conditions of Immokalee's housing stock is not available.

### **3. More County Participation Needed**

- Housing and community development efforts are often led by the area's nonprofit agencies, with little input by the County.
- Applications for the County's owner-occupied home repair program are only available in Naples. There is no avenue for interested applicants to apply in Immokalee.
- The Community Redevelopment Agency (CRA) does not take action on the Housing Element of the CRA plan, and CRA funds are only being used for infrastructure.
- There is a lack of confidence that the County has invested the appropriate political and staff effort in addressing affordable housing in Immokalee.

**RECOMMENDATION #16:** Efforts by individual County departments and divisions (e.g. CHS, Community Redevelopment Agency, Growth Management) to address affordable housing needs in Immokalee and Collier County as a whole are sometimes performed in isolated "silos." These departments and divisions should continue their efforts to improve communication and coordination, possibly with the assistance of Visio process mapping software. The departments and divisions involved in affordable housing should ensure that they are all familiar with the land use and affordable housing policies and regulations provided in documents such as the Growth Management Plan's Housing Element, the Land Development Code, the Immokalee Area Master Plan, and the SHIP Local Housing Assistance Plan (see Section IV for a detailed discussion of these documents).

**RECOMMENDATION #17:** CHS can expand Immokalee residents' awareness of and access to County affordable housing programs by working with local social service agencies to provide information, distributing brochures and other marketing materials, using social media, and dedicating a staff person to hold office hours in Immokalee. (See **RECOMMENDATIONS #1** and **#8**.)

**RECOMMENDATION #18:** It would be beneficial for CHS and the CRA to actively educate affordable housing developers and other stakeholders about the efforts they have undertaken in recent years to promote affordable housing and community development.

### **4. Difficulty with County Reimbursements for Housing-Related Expenditures**

Nonprofit organizations that develop affordable housing and housing-related programs have reported difficulty in obtaining reimbursement for qualified expenses from state and federal funds administered by the County. These organizations attribute the difficulty to a history of complex bureaucracy and a lack

of communication with the County. Several organizations that have capacity to develop affordable housing have either restructured their business to not rely on the County, or have stated they do not wish to work with the County on future developments.

It should be noted that efforts have been made to streamline the reimbursement process. The County reports that in the past 7 months, 90% of overall payment applications have been processed timely and 75% of HOME payment requests have been processed timely. The County has recently funded Income Certification training by the Florida Housing Coalition (see Section V), which served to clarify misconceptions that may have resulted in past payment delays.

**RECOMMENDATION #19:** It would be beneficial for the County to educate nonprofits on the requirements for seeking reimbursement of expenses from state and federal funding sources. The County should also streamline internal processes so that reimbursements are provided in a timely manner.

The County would benefit from additional outreach to housing providers in an effort to strengthen and/or rebuild these important relationships.

## **5. Negative Perception of Existing Affordable Housing Developments**

With the exception of the HA units, all rental units designated as affordable are at 92% occupancy or above. There is a perception that these complexes are dangerous, drug-infested, and poorly maintained.

A review of the FHFC compliance report found that Oakhaven Apartments was reported out of compliance during an April 2015 monitoring for failing to pass the Physical Condition Standard due to a 2014 fire. The damage has since been repaired, and the one damaged unit was back in service as of February 2016. No other physical deficiencies were noted in the report.

Even though the negative perceptions of the County's affordable housing developments are unfounded, they may persist and negatively impact the properties' financial performance.

**RECOMMENDATION #20:** The County should periodically review crime statistics to determine the accuracy of the allegations regarding drug use and crime. Should the County find that the allegations are accurate, efforts should be made to coordinate with management, police and tenants to develop a plan for improvement.

**RECOMMENDATION #21:** The County should work with the property owner, manager, tenants, neighbors and other community stakeholders on a plan to improve the reputation of Oakhaven.

In addition, the County should stay abreast of monitoring reports for rental projects located in Immokalee and be prepared to proactively address any noted concerns. The County should request to be added to the interested parties list for all Collier properties funded by FHFC. The contracted monitoring agents are currently First Housing, Amerinational, and Seltzer Management.

## **6. Lack of Public Investment in Affordable Housing**

Since the County's federal and state grants for affordable housing are insufficient to meet the need, the County should pursue additional funding. Ideas suggested by the organizations providing feedback included creating a dedicated revenue source (such as a hotel tax), developing a funding collaborative, and establishing public-private partnerships. The County is currently embarking on development of a Comprehensive Housing Plan which will further explore these and other recommendations.

**RECOMMENDATION #22:** To increase the size and stability of its SHIP grant, the County's legislative delegation should advocate for full funding of the Sadowski Housing Trust Fund. Full funding of SHIP would increase the County's allocation from approximately \$2.1 million to approximately \$2.25 million, and would increase Naples' allocation from approximately \$130,000 to an estimated \$225,000.

## **7. Definition of Affordable Housing and Collaboration**

- There are misconceptions about the meaning of "affordable housing." Due to negative perceptions and the reported lack of political support for "affordable" housing, the terms "workforce," "market," and "affordable" are undefined and used interchangeably.
- Local advocates have proposed that the issue be rebranded to focus on children and families, and a community-wide education effort should be initiated. Regardless of the rebranding, County staff, elected officials, stakeholders and the community should agree upon a label tied to a measurable indicator. For example, "workforce" housing could be defined as affordable to households earning between 100% AMI and 140% AMI.
- Elected officials, County staff, faith-based organizations, nonprofit social service organizations, the business community, and for-profit and nonprofit developers should collaborate rather than working in silos.
- The Board of County Commissioners (BCC) has directed that the Affordable Housing Advisory Committee (AHAC) and staff work together with the community to develop a short- and long-term Comprehensive Housing Plan. A project charter is slated for BCC approval in June 2016 and it is anticipated that an affordable housing expert consultant/partner will be engaged in the fall to facilitate the plan development.

**RECOMMENDATION #23:** Common terminology should be used by all stakeholders so that specific issues are well understood. Definitions for terms such as "affordable housing" and "workforce housing" should be established in the ongoing collaboration among the County, the United Way, the Community Redevelopment Agency, the Affordable Housing Advisory Committee, Immokalee nonprofits, and elected officials.



## **8. Leadership**

The United Way's Workforce Housing Summit, the Eden Park-Esperanza initiative, the Immokalee Interagency Council, and recommendations of the Affordable Housing Advisory Committee are striving to improve their coordination. While the United Way formed working groups at the October 2015 summit, the groups have not yet met, but plan to do so in the future.

**RECOMMENDATION #24:** An ongoing leadership team consisting of government and private for-profit and nonprofit stakeholders should be formed to advance Immokalee affordable housing initiatives in a coordinated manner. An additional staff person has recently been authorized for the Department to assist in this effort.

## Section III: Affordable Workforce Housing Workshop

On March 1, 2016, the Collier County Board of County Commissioners (BCC) held a full-day Affordable Workforce Housing Workshop to review incentives proposed by the Affordable Housing Advisory Committee (AHAC) for the SHIP Local Housing Assistance Plan (LHAP), as well as addressing overall affordable housing needs in the County. Many stakeholders participated in the event, including staff from the County Manager's Office, the Community & Human Services Division, and the Growth Management Department, as well as nonprofit affiliates, banking industry constituents, and a broad spectrum of community members from throughout Collier County. Florida Housing Coalition staff participated extensively in the workshop.

### Presentation: Overview of Local Government Affordable Housing Activities

In the morning, Coalition President/CEO Jaimie Ross gave a presentation on the roles and best practices of local governments in promoting affordable housing development. Highlights of her presentation are described below.

#### Statutory Framework

Florida Statutes §163.3177 requires every local government in Florida to develop a Comprehensive Plan, including a Housing Element that provides for housing options for its current and anticipated population, including its most vulnerable population groups. The Housing Element requirement does not compel a local government to build housing itself. Rather, a local government should use its police powers, its land use authority, and fair housing laws to create an environment in which affordable housing will be provided by the private sector.

#### Local Government Tools: Land Use Planning and Financial Resources

Local governments have many tools at their disposal to promote affordable housing development. Some tools are based on a local government's land use planning authority, while others consist of funds administered or accessed by the local government. There is some overlap among these two general types of tools, with some local land use policies creating new funding streams.

- **Inclusionary Housing Ordinance:** This land use policy requires housing developers to include a certain percentage of affordable housing units (often 15%) within market-rate developments. Inclusionary housing ordinances are authorized by §125.01055 and §166.0415, Florida Statutes. Good inclusionary housing ordinances require long-term or perpetual affordability, and provide public subsidies for some inclusionary units to make them affordable to very low-income households. Inclusionary units should be designed to blend in with market-rate units—for example, duplexes, triplexes, or townhomes can be designed to look similar to large single-family

homes in the same development. Inclusionary housing ordinances are most effective when they provide a pipeline of affordable properties for a local Community Land Trust.

- **Community Land Trusts (CLTs):** A local government can facilitate the formation of a private, mission-based nonprofit Community Land Trust. The CLT model separates ownership of a home from the land underneath it, with the Community Land Trust organization retaining ownership of the land. This model provides permanent affordability by taking the land out of the speculative market and sharing home value appreciation between homeowners and the CLT. When homebuyers purchase CLT homes, the CLT provides them with a 99-year ground lease to the land underneath the home. The CLT model can also be used to provide permanently affordable rental housing.
- **Accessory Dwelling Units (ADUs):** ADUs are small residential units that are built on existing residential lots and are secondary to the principal residential use on the property. An ADU, sometimes called a “granny flat,” can be an apartment within the primary residence or a freestanding home on the same lot as the primary residence, but should be a complete residential unit with spaces for sleeping, bathing, and cooking. ADUs are a tool to promote both affordable housing and smart growth, as they make use of existing infrastructure and already-developed land. ADUs are encouraged by §163.31771, F.S.
- **Flexibility:** Local land use ordinances, such as minimum lot sizes and required setbacks, should allow for development of relatively small residences with lower development costs. Additionally, local governments should avoid regressive impact fees.
- **Linkage Fee Ordinance:** This land use policy requires commercial developers to contribute to a local housing trust fund that supports the production and preservation of affordable housing. Linkage fees complement inclusionary housing ordinances by providing funds to subsidize units for very low-income households. A linkage fee is similar to an impact fee, and should ideally be justified by a study showing a “rational nexus” between commercial development and the need for affordable housing.
- **Sadowski State and Local Housing Trust Funds:** In 1992, the Florida Legislature increased the documentary stamp (doc stamp) tax on real estate transactions to create the Sadowski Trust Funds, a dedicated revenue source for affordable housing. Of the doc stamp tax revenue collected for affordable housing, about 70% is deposited in the Local Government Trust Fund (LGTF), and about 30% is deposited in the State Housing Trust Fund (SHTF).
  - LGTF funds support the State Housing Initiatives Partnership (SHIP) programs in all 67 counties and 52 major cities throughout the state. The funds are allocated to SHIP jurisdictions according to a population-based formula.
  - The SHTF supports the State Apartment Incentive Loan (SAIL) program, which is administered by the Florida Housing Finance Corporation and supports multifamily rental development. The SHTF funds other Florida Housing programs as well, such as the Predevelopment Loan Program (PLP).

Although the Sadowski Trust Funds were created as a dedicated revenue source for affordable housing, they must be appropriated on an annual basis by the Florida Legislature. It is vital for local governments to advocate for the Legislature to fully appropriate the Sadowski Trust Fund money for housing, rather than sweeping some of the funds into General Revenue.

- **Other Dedicated Funding Sources:** Some cities and counties have identified potential local sources of revenue for affordable housing. In addition to the linkage fees discussed above, options include recording fees and sales tax increases. For a city or county considering these options, it is important to discuss the advantages and disadvantages of each. One possibility to increase the political will for raising local revenue for affordable housing is to offset it with a reduction in other local taxes. For example, local tax revenue increases as property values rise, so it may be possible to adjust the local millage rate to stem the increase in local property taxes.
- **Low Income Housing Tax Credit (LIHTC) Program:** Known as “housing credits” in Florida, these tax credits for low-income rental housing development are authorized by the U.S. Treasury Department’s Internal Revenue Code. The federal government allows for a certain number of tax credits in each state per year, and Florida’s housing credit allocation is administered by the Florida Housing Finance Corporation. Florida Housing allocates the most valuable Housing Credits through competitive applications, and developers are generally required to obtain a matching contribution from the cities or counties where the proposed developments will be built. These matching funds can come from SHIP or other dedicated affordable housing funds administered by the local government.

## Existing and Proposed Affordable Housing Incentives

The morning session also included a discussion of the AHAC’s recommendations regarding current and proposed land use planning incentives for affordable housing. In its *2015 Incentive Review and Recommendation Report*, the AHAC recommended maintaining or expanding existing affordable housing incentives, including impact fee deferrals, reduction of parking and setback requirements, and flexible lot configurations. The report also provided several recommendations for new affordable housing policies and incentives, which include but are not limited to:

- Incentives for affordable elderly units, such as additional density or reduced impact fees
- Preservation of existing affordable housing, e.g. by extending the minimum affordability period from 15 to 30 years
- Identify dedicated revenue source(s) for the County’s Affordable Housing Trust Fund, such as impact fees, general funding, or additional tourist taxes
- Implement an inclusionary zoning ordinance

## Workshop Outcomes

The Board of County Commissioners authorized the development of a comprehensive Community Housing Plan for Collier County, as recommended by the AHAC. The Plan will synthesize quantitative data on housing needs, stakeholder input, and a review of existing programs, regulations, and incentives related to affordable housing development. All options are open for consideration in the Community Housing Plan. This includes the most ambitious AHAC recommendations, such as inclusionary housing, as well as options not recommended by the AHAC (e.g. Accessory Dwelling Units).

The workshop also provided stakeholders with an opportunity to voice concerns and identify gaps in Collier County's affordable housing delivery system. Most notably, Steven Kirk, the Executive Director of Rural Neighborhoods, stated that a major impediment to affordable housing development in Collier County is the lack of local government matching funds for developments funded by sources such as SAIL and LIHTC. As the next section discusses, Mr. Kirk's concerns are addressed by the new rental strategies in Collier County's Local Housing Assistance Plan (LHAP) for the use of SHIP funds. Additionally, in workshop discussions about mechanisms for reducing residential development costs, Jaimie Ross cited Alachua County's residential impact fees, which are charged per square foot rather than per unit. These options and others are considered in the following section, which reviews the impact of land use policies and regulations on affordable housing development.

## Section IV: Impact of Land Use Policies and Regulations

A community's land development policies and practices—including its Comprehensive Plan, redevelopment plans, zoning and land development regulations, and code enforcement—play a powerful role in promoting or hindering affordable housing development. Florida Housing Coalition staff reviewed the land development documents and processes relevant to housing activities in Immokalee, and obtained additional insight from County staff, the Collier County Community Redevelopment Agency, and local nonprofit leaders. Some affordable housing-related provisions in the County's planning documents would benefit from modifications, while others simply require ongoing implementation.

### Housing Element of Collier County Comprehensive Plan

Florida's Community Planning Act requires local governments to develop Comprehensive Plans, which provide an overall vision and guiding policies for a community's orderly development. The Comprehensive plan must include a 5-year and 10-year planning period, at a minimum. In addition to required periodic updates to reflect statutory changes governing Comprehensive Plans, the Plan should be updated every few years to incorporate new data and reflect changing conditions.

One required element of a Comprehensive Plan (also known as a Growth Management Plan in some communities) is a Housing Element, which provides guidelines for meeting the housing needs of current and future residents at all income levels. Collier County last updated the Housing Element of its Growth Management Plan on January 8, 2013, enacting a series of amendments to support several affordable housing strategies that have the potential to significantly impact affordable housing development in Immokalee. Coalition staff identified several policies that could be revised to provide stronger or clearer requirements, or should be targeted for implementation. These policies and associated recommendations are detailed below:

1. On June 23, 2015, the Collier County Community and Human Services Department fulfilled the requirements of Policies 1.1 through 1.4 with an *Affordable/Workforce Housing Population Based Index Model Methodology*. The document states the Department's intention to review and update the model semi-annually.

**Policy 1.1:** By January 14, 2014, the Department of Housing, Human and Veteran Services shall establish a method of Indexing the demand for very-low, low, moderate and affordable workforce housing.

**Policy 1.2:** By January 14, 2014, the Department of Housing, Human and Veteran Services shall establish a method of Indexing the availability and costs of very-low, low, moderate and affordable workforce housing.

**Policy 1.3:** By January 14, 2014, the Department of Housing, Human and Veteran Services shall develop methods to predict future need, based on the Indexes established in Policies 1.1 and 1.2 above.

**Policy 1.4:** By January 14, 2015, the Department of Housing, Human and Veteran Services shall establish necessary strategies, methods and tools to support [the provision of very-low, low, moderate, and affordable workforce housing].

**RECOMMENDATION #25:** Going forward, the Department is advised to put a process in place for ensuring that the document is reviewed and updated regularly.

**RECOMMENDATION #26:** To ensure ease of implementation, the Department may wish to alternate between relatively simple updates and comprehensive updates on a semi-annual basis, with the latter being conducted annually. Six months after each comprehensive update, the Department could review the most recent local data on home sale prices and rental prices and vacancies. Data from sources such as the Southwest Florida Apartment Association are less comprehensive than the U.S. Census Bureau or HUD data used by the Shimberg Center for Housing Studies, but are more current.

Regarding the comprehensive update methodology, the Department may wish to provide more detail on moderate and severe housing cost burden by tenure and income bracket, using projections available from the Shimberg Center. Annual comprehensive updates are also an appropriate time to assess whether the studies required by Policies 1.1 through 1.4 are successful in supporting affordable housing initiatives.

2. In accordance with Policy 1.5, the County currently has a map of the affordable housing developments in each County Commissioner's district. Implementation of Policy 1.11 is expected to be on the County's 2017 calendar.

**Policy 1.5:** On an annual basis, beginning in June 2014, the Department of Housing, Human and Veteran Services shall provide a report to the Board of County Commissioners on the status of affordable housing in each Commission District within the County.

**Policy 1.11:** The County shall maintain an inventory of all approved affordable housing units within the county. The inventory shall contain the location, structure type, number of bedrooms, and target income range for each housing unit.

**RECOMMENDATION #27:** It is recommended that the responsible County departments coordinate efforts to ensure that these Policies are implemented on a regular basis. For Policy 1.11, an annual or semi-annual review of the affordable housing inventory should be considered. Similar to the recommendations for Policies 1.1 through 1.4, the responsible departments should periodically assess whether the implementation of Policies 1.5 and 1.11 are successful in supporting affordable housing initiatives.

3. Policy 2.4 calls for land use ordinances that allow flexible housing development practices. This policy is intended to promote affordable housing development by allowing for relatively small and low-cost housing units. However, the policy does not mention affordable housing specifically.

**Policy 2.4:** The County shall, with the City of Naples, 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.

**RECOMMENDATION #28:** Policy 2.4 should specifically require the County to review existing codes and ordinances for positive or negative impacts on affordable housing development, and to amend these documents as needed to facilitate the development of housing for low- and moderate-income residents.

**4. Policies 2.7 and 2.10 both reference impact fee deferrals:**

**Policy 2.7:** The County shall increase the utilization of existing impact fee ordinances to facilitate the development of affordable housing through the provisions of deferrals.

**Policy 2.10:** The County Housing, Human and Veteran Services Department shall continue to administer affordable housing programs, in cooperation with public and private sponsors, to provide safe, affordable housing to residents of the County's urban designated areas and rural areas. Programs administered 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
- Acquisition (exclusive of Collier County Government) and rehabilitation program

**RECOMMENDATION #29:** A complete waiver or substantial reduction of impact fees for affordable housing developments for low- and moderate-income households would have a much greater impact in decreasing development costs and incentivizing affordable housing than providing impact fee deferrals. Deferring the impact fee over a given amount of time does not reduce the cost of development, and the repayment of the fee remains a part of the development's financial constraints. Another powerful mechanism for reducing the cost of housing would be to charge impact fees per square foot of residential development, rather than per unit. This approach is currently used by Alachua County, and incentivizes the development of smaller, lower-cost housing units.

**5. The implementation of Policies 4.2 and 8.1 depends on the availability of comprehensive and current data on housing conditions in Collier County, clear definitions of substandard housing (including guidelines on when a unit should be rehabilitated or demolished and reconstructed), and a process for evaluating progress on correcting deficiencies in the County's housing stock. Except for the *2011 Housing Condition Inventory for Immokalee*, Collier County lacks both comprehensive data on substandard housing conditions and a mechanism for tracking progress on eliminating them.**

Rehabilitation, demolition, and code enforcement are essential parts of a community's housing strategy, but these activities can reduce the overall supply of low-cost housing. Rehabilitated homes become more expensive to buy or rent on the private market, while demolition permanently removes units from the housing stock, and code enforcement liens can lead to home foreclosures.



**Policy 4.2:** The County shall, with the City of Naples, 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 8.1:** The County shall continue to target affordable housing and code enforcement programs to correct deficiencies identified in the 2004 Immokalee Urban Area housing assessment survey.

**RECOMMENDATION #30:** The Housing Element should include provisions for data collection and ongoing evaluation of substandard housing conditions, which should be implemented in a coordinated fashion by the responsible County departments, with a specified timeline for completion and periodic updates.

**RECOMMENDATION #31:** Policies 4.2 and 8.1 should include provisions for retaining affordable housing stock. To ensure that rehabilitation, demolition, and code enforcement activities do not erode the affordable housing supply in Immokalee and other parts of Collier County, Policies 4.2 and 8.1 should encourage the use of affordability restrictions and investment of County affordable housing funds for home rehabilitation or reconstruction, as appropriate. At a minimum, these restrictions should apply to any housing unit receiving County rehabilitation funds.

6. The Housing Element does not specifically mention Accessory Dwelling Units as an affordable housing alternative.

**RECOMMENDATION #32:** An objective allowing and encouraging the use of Accessory Dwelling Units to create variety in Immokalee's housing stock and expand affordable housing options should be added to the Housing Element.

## Immokalee Area Master Plan

The Immokalee Area Master Plan, a component of Collier County's Growth Management Plan, was last updated on March 10, 2015. However, most provisions have not changed since 2007. Many of the Master Plan's policies are sound and may still be relevant to the community, but the document needs updates to reflect the latest quantitative and qualitative data on housing and community development needs. For example, the Master Plan could use specific guidance on farmworker housing and nonconforming mobile home parks.

Overall, the Master Plan would benefit from a thorough update to reflect the community's current housing conditions, ensure consistency with the Housing Element of the Growth Management Plan, and provide an opportunity for public input. Specific issues and associated recommendations are detailed below:

1. Policies 2.1.1 and 2.1.2 require capital improvements to be made to Immokalee's neighborhoods, with Policy 2.1.1 stating that "needed public infrastructure improvements ... shall receive priority in the Capital Improvement Element." However, the extent to which the County's current Capital Improvement Plan prioritizes Immokalee improvements is unclear. Many projects in the Schedule of Capital Improvements for Fiscal Years 2016 through 2020 do not identify specific locations.

**RECOMMENDATION #33:** CHS should collaborate with the County's Comprehensive Planning Section and other responsible departments to ensure that capital improvements in Immokalee are prioritized.

2. In compliance with Policy 2.1.3, a staff member from the Growth Management Department has office hours in Immokalee to answer general zoning questions. This is unknown to many residents and other County staff members working in Immokalee. Moreover, for housing-related services from the Community and Human Services Division, Immokalee residents must travel to Naples.

**RECOMMENDATION #34:** Assertive marketing of the presence of County Planning staff in Immokalee may reduce the incidence of Immokalee residents failing to obtain proper permits for rehabilitation of homes and other structures. It is recommended that CHS staff regularly attend meetings of the Immokalee Interagency Council and engage with Rural Neighborhoods on community events in the Eden Park/Esperanza neighborhoods to spread awareness about the availability of County Planning staff in Immokalee.

In addition, the Community and Human Services Division could build upon the Growth Management Department's work in Immokalee by establishing its own presence in the community. CHS could utilize the 750 South 5<sup>th</sup> Street building as a Housing Resource Center, providing information and applications for purchase assistance, home repair programs, and other housing-related services. (See **RECOMMENDATIONS #1** and **#8**.)

3. Policies 2.2.1, 2.2.2, and 2.4.3 require studies regarding neighborhood revitalization needs, options for obtaining land for affordable housing development, and farmworker housing, respectively. The information from these studies is central to addressing Immokalee's housing needs.

**Policy 2.2.1:** The County Operations Support and Housing Department will analyze the data collected from the Immokalee Housing Initiative Program Survey and establish a process for revitalizing Immokalee's neighborhoods.

**Policy 2.2.2:** The County shall continue to research initiatives such as land banking of foreclosed upon land due to County held liens, land grants from County and other public holdings, and tax incentives for private owners who commit to developing affordable-workforce housing.

**Policy 2.4.3:** The County Manager, or his designee, in cooperation with the Florida Department of Health, shall be responsible for an annual report to the Board of County Commissioners on identified "living quarters for four or more seasonal, temporary or migrant farm workers" as defined in Chapter 10D-25, F.A.C. The report shall include recommendations on improvements to ensure County code and F.A.C.

compliance and suggested amendments to County codes that may restrict needed rehabilitation and new development.

**RECOMMENDATION #35:** The responsible County departments should coordinate efforts to ensure that these policies are implemented on an annual or semi-annual basis, or are amended to provide new guidance. It may be useful to address these policies, particularly Policy 2.2.2, in the forthcoming Comprehensive Housing Plan.

4. The Immokalee Area Master Plan does not currently address Housing Element policies that call for use of local funding sources and land use policy tools to facilitate farmworker housing development.

**RECOMMENDATION #36:** The Master Plan should expand on Housing Element provisions for regulatory incentives and County housing funds to support farmworker housing, such as providing adequate infrastructure (Policy 2.12) and using CDBG and SHIP funds in a complementary fashion (Policy 8.4). In addition, explicit guidance should be provided on suitable types of farmworker housing for the zoning districts described in the Master Plan.

5. The Master Plan does not currently have policy provisions for Accessory Dwelling Units.

**RECOMMENDATION #37:** Update policies to permit ADUs in all residential districts, as a measure to create variety in Immokalee's housing stock and expand affordable housing options.

6. The Master Plan does not currently provide extensive guidance for mobile homes, aside from specifying that mobile home developments are only permitted in the form of mobile home subdivisions or parks as authorized in the Land Development Code.

**RECOMMENDATION #38:** The Master Plan should provide guidance for addressing slum and blight created by nonconforming or substandard mobile homes and mobile home parks. The Plan may propose strategies such as enhanced enforcement of health and safety regulations and/or financial incentives to mobile home park owners to bring their properties into compliance with existing codes.

## Immokalee Redevelopment Area Plan

The Immokalee Redevelopment Area Plan, a component of the Collier County Community Redevelopment Plan, provides guidelines for the activities of the Collier County Community Redevelopment Agency (CRA) in the designated Immokalee Redevelopment Area. The Immokalee Redevelopment Area Plan was last updated in 2000.

**RECOMMENDATION #39:** The Immokalee Redevelopment Area Plan is due for a thorough review and update, including updates of references to the Housing Element. The Redevelopment Area goals and

objectives should be revised to reflect progress made since 2000 as well as current issues and concerns in Immokalee. The CRA and its partners should also review the progress made on specific tasks outlined in the current plan, some of which have target dates over 20 years old.

In the last 16 years, the CRA has made progress on the Immokalee Redevelopment Area Plan's goals by providing infrastructure (specifically stormwater improvements), developed the award-winning La Placita Park, and provided façade enhancements. The improvements have been primarily concentrated in commercial areas, but have also benefitted a few residential areas, including the Esperanza Place development.

The CRA is a potential resource for additional affordable housing funds in Immokalee. Community Redevelopment Agencies often focus on infrastructure in commercial areas because business taxes are an important revenue source for continued redevelopment. However, a balance is needed between commercial and residential investments, since visible improvements in the quality of housing stock can help encourage businesses to invest in downtown areas. The Immokalee Redevelopment Area Plan includes multiple provisions supporting a strong role in affordable housing investment:

- Section 4.4 – Community Objectives: Includes a Housing Goal – “To Provide Safe, Affordable Housing to All [Empowerment] Zone Residents”
- Section 4.7 – Redevelopment Area Goals: Includes the following affordable housing-related goals:
  - “Provide opportunities for adequate, safe and affordable housing. Encourage the development of both affordable rental and home ownership through rehabilitation and new construction.”
  - “Develop a program to address the replacement of existing old mobile homes with newer mobile home units or modular homes.”
  - “Create adaptive development standards in each of the subdistricts identified in the Immokalee Overlay District to permit flexibility and incentives for redevelopment and development.”
- Section 4.8 – Phase I – Redevelopment Activities: Contains provisions for affordable housing development and rehabilitation in the South Immokalee, Main Street, and Lake Trafford areas. For example:
  - “Provide a rehabilitation or replacement of substandard housing within the neighborhood.” [South Immokalee and Main Street Program Area]
  - “Property may need to be acquired within this subarea for the implementation of housing and economic development initiatives.” [South Immokalee Area]
  - “Revitalize the neighborhoods adjacent to Lake Trafford Road through a comprehensive housing improvement project that will include increased code enforcement, economic incentives for replacement and rehabilitation of mobile homes and the development or rehabilitation of single and multi-family structures.” [Lake Trafford Area]

Additionally, this section contains several provisions for “Neighborhood Revitalization/Housing Programs.”

- Section 4.9 – Future Phases: Contains provisions related to affordable housing development, including:
  - “Continue land assembly for the development of new affordable housing.” [Phase II]
  - “Coordinate with Farmworkers Village to develop programs that move tenants from renter housing to home ownership.” [Phase II]
  - “Continue land assembly for the future development of affordable housing and economic development.” [Phase III]
- Section 4.10 – Neighborhood Impact Statement: Contains the following statements indicating that supporting affordable housing development is a primary goal in the Immokalee Redevelopment Area:
  - “The structure of the Immokalee Redevelopment Plan was specifically organized to have a positive impact on housing and residential neighborhoods by providing incentives to rehabilitate and replace unsafe housing.”
  - “... the provision of supportive services to existing residents and the additional low and moderate income housing in the area are primary objectives of the plan...”

Additionally, Table One identifies several housing-related projects to be funded by Tax Increment Financing (TIF), although the amount of funding was to be determined at a later date.

**RECOMMENDATION #40:** We recommend that the Collier County CRA expand its investment in “bricks and mortar,” residential land purchases, and other activities directly related to affordable housing development. To fully implement the Immokalee Redevelopment Area’s provisions for affordable housing investment, the CRA depends on the active support of the County’s elected officials.

**RECOMMENDATION #41:** Table One in Section 4.10 of the Immokalee Redevelopment Area plan should be revisited, with funding sources identified for unfinished housing activities. Going forward, this table should be updated on an annual basis.

In 2012, the CRA and its partners hired a consulting firm to rewrite the Immokalee Redevelopment Area Plan at a cost of approximately \$300,000. Due to a political impasse, the updated plan was never implemented.

**RECOMMENDATION #42:** To fulfill **RECOMMENDATION #39** for a thorough Plan update, the CRA should consider adoption and implementation of the proposed document revision performed by the hired consultant firm in 2012. If at all possible the document should be reviewed as a full replacement to the existing CRA Plan, with minor revisions as needed. Going forward, it is recommended that the CRA use

consultants that charge considerably lower fees—no more than \$50,000 as a “rule of thumb.” This practice will free up funds for affordable housing development and rehabilitation.

## Local Housing Assistance Plan

Collier County’s current Local Housing Assistance Plan (LHAP) for the use of SHIP funds includes eight strategies: 1) Owner-Occupied Rehabilitation, 2) Purchase Assistance, 3) Foreclosure Prevention, 4) Disaster Mitigation, 5) Rental Development, 6) Rental Assistance, 7) Rental Rehabilitation, and 8) Rental Acquisition. The County’s new LHAP, which covers Fiscal Years 2016-2017 through 2018-2019 and will take effect in July 2016, is the first to include strategies for Foreclosure Prevention, Rental Development, and Rental Assistance. The Rental Development strategy allows for SHIP funds to be provided as gap financing or a local match for developments funded by other state or federal housing programs, such as the State Apartment Incentive Loan (SAIL) program or the Low Income Housing Tax Credit (LIHTC). The Rental Rehabilitation and Rental Acquisition strategies, which were recently added to the LHAP with the help of Florida Housing Coalition staff (Section V), also allow for SHIP funds to be leveraged by other funding sources.

Another change included in the current LHAP is a tiered system for providing purchase assistance. The Purchase Assistance strategy previously provided \$20,000 or 20% of the purchase price, whichever was less, to all low- and moderate-income buyers. As amended, the Purchase Assistance strategy provides a maximum of \$50,000, \$30,000, and \$20,000 to households up to 50% AMI (extremely and very low-income), between 50% and 80% AMI (low-income), and between 80% and 120% AMI (moderate-income), respectively.

The LHAP also contains several land use policy incentives for affordable housing. These include the two incentives that SHIP jurisdictions are required by statute to include in their LHAPs: expedited permitting for affordable housing developments, and an ongoing review process for identifying provisions of proposed local regulations that may increase housing costs. Two additional incentives listed in the LHAP are Collier County’s Affordable Housing Density Bonus (see the discussion below of Collier County’s Land Development Code), and a process for identifying surplus County-owned lands that are suitable for affordable housing. The latter incentive is required of all counties by F.S. 125.379, and the inventory of suitable properties is updated every 3 years.

One limitation of the current LHAP is that the strategies for Rental Development, Rental Rehabilitation, and Rental Acquisition only require a 15-year affordability period. As subsidized and low-cost market-rate rental developments are continually lost from the housing stock, it is more critical than ever to have long-term affordability for rental developments that are constructed or rehabilitated with public funds. Although many federal and state funding sources require affordability periods of 30 to 50 years, the HOME program requires only 20 years as a maximum for rental developments, and some SHIP-assisted rental developments do not receive public funds with long-term affordability requirements.

**RECOMMENDATION #43:** The County should make a technical revision to the Rental Development, Rental Rehabilitation, and Rental Acquisition strategies to require a 50-year affordability period.

## Collier County Land Development Code

The Land Development Code (LDC) is one of the key tools for implementing the policies expressed in the Housing Element and the Immokalee Area Master Plan. Collier County's LDC includes several regulations designed to facilitate affordable housing production:

- An Affordable Housing Density Bonus (LDC §2.06.00), which allows developers to increase the density of their developments above the maximum allowed base density in return for making a certain percentage of units affordable to low- or moderate-income households. According to the schedule in the ordinance, higher density bonuses are provided for making a higher percentage of units affordable, and for targeting lower income brackets.
- An Affordable Housing Impact Fee Deferral Program (Code of Ordinances Ch. 74, Article IV). Under this program, low- and moderate-income owner-occupants of affordable units may defer payment of impact fees until they sell, refinance, or lose their homestead exemption. Owners of affordable rental units for low- and moderate-income households must repay deferred impact fees within ten years. However, the available value of impact fee deferrals is limited, and deferrals are available on a first-come, first-served basis. The deferrals were unavailable for single-family residences for about seven years during the Recession and its aftermath, but were reinstated by the Board of County Commissioners on June 23, 2015.
- Provisions for zero lot line configurations, reduced parking and setback requirements, and reduced street widths. These provisions give flexibility to many development types, and are not restricted to affordable housing developments<sup>3</sup>.

However, some LDC provisions could be introduced or expanded to enhance consistency the Housing Element and the Immokalee planning documents, and to provide further incentives for affordable housing development. Recommendations for revisions and improved implementation of the LDC are provided below.

1. The Affordable Housing Density Bonus (AHDB) contains several provisions that would benefit from modifications or a review of implementation practices:
  - To obtain an Affordable Housing Density Bonus, the developer must have a pre-application conference with County staff, and must submit a formal application that identifies the proposed

---

<sup>3</sup> For more information on these provisions, see the *2015 Incentive Review and Recommendation Report* issued by Collier County's Affordable Housing Advisory Committee.

zoning district, the number and type of affordable units to be built, and other details (§2.06.01(D) & (E)). In practice, the formal AHDB framework cannot be used if the developer has already passed through the development approval process. As a result, several developers have made affordable housing commitments to the County outside the formal AHDB process, a practice that potentially dilutes the effectiveness of the AHDB.

**RECOMMENDATION #44:** As **RECOMMENDATION #13** proposed, The County should study alternatives that would result in more widespread use of the AHDB program or comparable affordable housing commitments. These alternatives may include:

- Amending the AHDB ordinance to provide greater flexibility, allowing it to be used for developments that have already obtained PUD approval.
  - Adding language to the Land Development Code requiring that affordable housing agreements formed outside the AHDB process should have certain minimum features that would have been required under the AHDB.
  - Coordinating with the Development Review Division to ensure that the issue of affordable housing commitments is addressed in the preapplication stages for developers seeking PUD approval or other approvals.
  - Replacing the AHDB ordinance with a mandatory inclusionary housing ordinance (see Section III and discussion below).
- AHDB development agreements are required to specify both the number of bedrooms and the rent or sales price for each unit (§2.06.04(A)(3) and (6), respectively). However, it is common for several years to elapse between execution of a development agreement and completion of housing units. By that time, Area Median Income has often increased, and the sale prices or rents affordable to low- and moderate-income households have increased. Additionally, the affordability of a housing unit depends on the household size. (For example, a 3-bedroom apartment may have a monthly rent set at 30% of the monthly income of a 4-person household at 50% AMI. However, the rent will comprise more than 30% of the monthly income of a 3-person household at 50% AMI.)

**RECOMMENDATION #45:** Instead of requiring that developers specify rents and sale prices of affordable units should be eliminated, the ordinance should provide flexible language requiring that AHDB agreements reference a schedule of price limits that will be in effect at the time the units are ready for occupancy (e.g. HUD rent limits specified by bedroom size). To clarify the program's intent and provide guidance on setting prices, the County should consider adding regulatory language similar to §67-37.005(5)(e) of the SHIP Rule, which allows for households to pay more than 30% of their incomes for housing, within certain limits.



- If an owner of an affordable home sells the home within the affordability period, they must pay a portion of the sale proceeds to County, which dedicates the funds future affordable housing development (§2.06.04(A)(9) & (10)). On the other hand, §2.06.04(A)(19) stipulates that:

Each affordable housing unit shall be restricted to remain and be maintained as the type of affordable housing rental unit (moderate, low or very low income) designated in accordance with the AHDB development agreement for at least 15 years from the issuance of a certificate of occupancy for such unit.

LDC §2.06.04(A)(9) and (10) imply that the home may be sold at its market price. However, since §2.06.04(A)(19) already restricts the resale price during the affordability period, §2.06.04(A)(9) and (10) limit the sale proceeds for the owner even further.

**RECOMMENDATION #46:** The procedure for setting a home's resale price during the affordability period should be clarified. Rather than requiring the home to be sold at an "affordable" (30% of income) price to the next income-qualified buyer, it would be best to provide a formula for calculating the exact resale price. Unlike the formula in §2.06.04(A)(9) and (10), the resale formula should explicitly result in a resale price that is less than the home's market value, while providing a fair return to the seller (e.g. 25% of the market appreciation over the price that the seller paid for the home). Rather than conveying funds to the County for future affordable housing development, this formula would capitalize the value of the County's initial density bonus into a subsidy for the next homebuyer by reducing the sale price below market rate.

- The affordability period for affordable units created under the AHDB is only 15 years (§2.06.04(A)(19)).

**RECOMMENDATION #47:** The affordability period should be extended from 15 years to 50 years.

- The current ordinance requires developers to verify whether prospective buyers or tenants are income-qualified (§2.06.05(B)(2)).

**RECOMMENDATION #48:** This responsibility should be shifted to County staff or a subrecipient, to minimize the bureaucratic burden for the developer.

- The AHDB ordinance provides enforcement mechanisms for developers that violate an agreement made with the County to provide affordable units. However, the ordinance does not address situations where the developer receives permission from the County to not provide affordable units as originally intended. Specifically, the ordinance does not require developers to relinquish their density bonuses if the County releases them from obligations to provide affordable units under the AHDB.

**RECOMMENDATION #49:** County staff should review whether any developers have been allowed to use density bonuses after being released from affordable housing obligations.

- Finally, the AHDB program is voluntary, and most developers do not participate. By contrast, a mandatory inclusionary housing ordinance would require developers to provide a certain amount of affordable housing. Florida Housing Coalition President/CEO Jaimie Ross provided information on inclusionary housing best practices at the Affordable Workforce Housing Workshop on March 1, 2016, discussed in Section III.

**RECOMMENDATION #50:** Once the County hires a consultant to develop a Comprehensive Housing Plan, County staff should work with the consultant to develop specific recommendations for a mandatory inclusionary housing ordinance. To minimize the cost of compliance for developers, the maximum density in the County's base residential zoning districts should be increased.

2. The LDC explicitly permits farmworker housing, including dormitory-style housing, only in the Rural Agricultural and Rural Fringe Mixed-Use Districts (LDC Chapter 2). In the Rural Agricultural district, the LDC requires that farmworker housing be used solely for that purpose.

**RECOMMENDATION #51:** County staff should evaluate whether the LDC's limited provisions for farmworker housing constrict the supply to a level below what is needed, or whether other housing types provided in other districts are able to meet this need, even if they are not classified as "farm labor housing" under the LDC. If necessary, provisions for "farm labor housing" should be expanded in the LDC.

3. Modular homes can provide a high-quality affordable homeownership option for low- and moderate-income households. However, the LDC permits modular homes only in Mobile Home Districts (§2.03.02).

**RECOMMENDATION #52:** Modular homes should be permitted wherever single-family homes are permitted.

4. The Immokalee Urban Overlay District includes a Nonconforming Mobile Home Overlay Subdistrict (§2.03.07(G)(6)), which establishes provisions for owners of nonconforming mobile home parks to submit Site Improvement Plans. Specific requirements for Site Improvement Plans are provided in §10.02.05(F). This ordinance is designed to implement several provisions of the Immokalee Area Master Plan that call for improving substandard mobile homes and mobile home parks. Although Immokalee's substandard mobile home parks have been a vested land use in the community for many years, they directly conflict with property maintenance and site development ordinances. These mobile home parks are perhaps the most visible example of blight in Immokalee, and they undermine other CRA goals for attracting business investment and promoting neighborhood revitalization.

**RECOMMENDATION #53:** To address this persistent problem, it is strongly recommended that the CRA and appropriate County divisions (e.g. CHS, Code Enforcement) encourage the Board of County Commissioners to pass a resolution in support of active enforcement of the Immokalee Urban Overlay District provisions. As an alternative, the BCC is encouraged to approve a revised ordinance for the

Immokalee Urban Overlay District that is legally defensible and addresses concerns of property owners, while preserving the spirit of the original ordinance. The ordinance would be best implemented through a phased process, which may require financial assistance from the County (see [RECOMMENDATION #36](#)).

5. Many of Immokalee's vacant lots are nonconforming, and would fail to meet minimum lot size and width requirements in LDC §4.02.00 for development in their respective base zoning districts.

**RECOMMENDATION #54:** County staff should review whether the above-mentioned provisions for zero lot line configurations, reduced parking and setback requirements, and reduced street widths offer sufficient flexibility to allow affordable housing development on Immokalee's nonconforming lots. If necessary, the provisions of the Immokalee Urban Overlay District should be expanded to provide this flexibility.

6. Accessory Dwelling Units (ADUs) are explicitly permitted only in Rural Land Stewardship Area districts (§4.08.00). Guesthouses are permitted in the Rural Agricultural, Estate, and Gateway Triangle Mixed-Use Districts (LDC Chapter 2), but leasing or renting a guesthouse is prohibited (§5.03.03).

**RECOMMENDATION #55:** The LDC should explicitly permit Accessory Dwelling Units in all residential zoning districts. Additionally, the County should revise the LDC to relax side and rear setback requirements (§4.02.00) as they relate to the placement of ADUs.

7. For Planned Unit Developments, LDC §10.02.13(E)(3)(c) allows the County to release the developer from requirements to pay affordable housing contributions. The LDC does not contain provisions for monetary affordable housing contributions, so this provision refers to contributions that are required by the County on a case-by-case basis in Development Agreements. In these agreements, the developer generally agrees to pay affordable housing contributions in return for some benefit from the County, such as increased density or a conditional use permit.

**RECOMMENDATION #56:** This LDC provision should stipulate that developers who ask to be released from affordable housing contribution requirements, will relinquish any benefits that the County provided in exchange for that affordable housing contribution.

8. Fees related to development applications, permitting, and infrastructure impacts are especially burdensome to low-income homeowners whose homes have fallen into disrepair and are in need of rehabilitation. Water and sewer connection fees are another major barrier to housing construction and rehabilitation in Immokalee. Much of Immokalee's land area lacks water and sewer connections and is dependent on septic systems. Many of these septic systems are failing, posing a threat to public health and safety and the environment.

**RECOMMENDATION #57:** Impact fees in Immokalee should be reduced or waived whenever possible, rather than merely deferred. Since the entirety of Immokalee is a Community Redevelopment Area with a

determination of blighted conditions, it would be appropriate to target fee waivers to property owners wishing to construct or rehabilitate housing in Immokalee. If the County pursues this option, it should identify funding sources to compensate for lost fee revenue. Additionally, Collier County should charge impact fees per square foot of residential development rather than per unit. As mentioned in the [Housing Element](#) discussion above, Alachua County takes this approach. (See [RECOMMENDATION #29](#)).

**RECOMMENDATION #58:** Immokalee's needed water and sewer improvements will only be accomplished through a significant capital improvement investment by the County and the South Florida Water Management District, leveraged with CRA, state, and federal funding.

## Code Enforcement

The Immokalee Area Master Plan emphasizes the need for strong and proactive code enforcement. However, feedback from local stakeholders suggests that the current code enforcement efforts in Immokalee are mainly reactive in nature, driven by the Collier County Sheriff's Office or by citizen complaint. Although data on code enforcement complaints was not available for this report, local feedback suggests that many complaints involve mobile home parks and single-family housing renovations done without obtaining proper permitting. Non-conforming and substandard mobile home parks, in particular, were cited by several stakeholders as an eyesore and a public health and safety hazard. These units may be included in the 54 mobile home units that were identified as deteriorated or dilapidated in the 2011 *Housing Condition Inventory* (see Section I), but it is also possible that the number of deteriorated and dilapidated mobile homes has significantly increased since 2011.

Two specific health and safety concerns were raised in discussions between Coalition staff and local stakeholders:

- Some mobile home units lack address numbers, making it extremely difficult for first responders (fire, police, ambulance) to identify where in the mobile home park a distress call originated.
- In some mobile home parks, the units are spatially located in a manner that impedes access to first responder vehicles.

**RECOMMENDATION #59:** The County should raise awareness about the presence of Growth Management Department staff in Immokalee, and should establish a presence of Community and Human Services Division staff in the community (see [RECOMMENDATION #34](#)). This would help Immokalee property owners obtain proper authorization and/or County funds for home repairs.

**RECOMMENDATION #60:** The *Housing Condition Inventory* study should be updated. If it is not feasible to conduct a complete update at this time, the County should commission a comprehensive survey of the exterior conditions of mobile homes in Immokalee.

**RECOMMENDATION #61:** The County should analyze data on code enforcement complaints addressed in the past year to determine the frequency and nature of complaints related to mobile home parks. This

data should inform the scale and the specific elements of a County effort to secure compliance from owners of substandard or nonconforming mobile home parks.

**RECOMMENDATION #62:** County divisions involved in maintaining housing quality and compliance, including CHS, Comprehensive Planning, Development Review, and Code Enforcement, should work with the County Attorney to build a case for strong enforcement of local codes in Immokalee’s nonconforming and substandard mobile home parks. In particular, the County should seek qualified legal advice to determine how to strike a balance between the County’s police powers to protect health, safety, and welfare, and protections afforded to private property owners with vested land use rights.

**RECOMMENDATION #63:** The County should propose strategies to correct substandard and nonconforming conditions in Immokalee’s mobile homes and mobile home parks, which may include expanded enforcement efforts and/or financial incentives to mobile home park owners (see **RECOMMENDATION #38**). The proposed strategies should balance principle and practicality. That is, as a matter of principle, the County should not be forced to bear the cost of correcting deficiencies on properties owned by parties with the financial means to do so themselves. However, as a matter of practicality, the County must recognize that the owners of deficient mobile homes and mobile home parks would likely pass on the cost of correcting deficiencies to their tenants, who would no longer be able to afford these units. It may not be ideal for the County to spend public funds to help landowners correct these deficiencies, but it would protect the tenants of these mobile homes from displacement. Moreover, the public costs of correcting these deficiencies could be offset by reduced taxpayer expenditures on Fire, Sheriff, and Health Department responses to emergencies in these mobile home parks.

### Inventory of Surplus County Property Suitable for Affordable Housing

All Florida Counties are required to identify County-owned surplus properties that would be suitable for on-site affordable housing development, or could be sold to raise funds for affordable housing development elsewhere (F.S. §125.379)<sup>4</sup>. The first County inventories of surplus lands suitable for these purposes were developed in 2007, and Counties are required to update their inventories every three years. These properties generally fall into a County’s possession after becoming tax-delinquent and passing through the escheatment process. To dispose of surplus properties that are suitable for on-site affordable housing development, many Counties donate the properties to local nonprofit housing developers. For more information on inventories of surplus lands suitable for affordable housing disposition, please refer to the following articles from the Florida Housing Coalition’s Housing News Network Journal:

- “Surplus Lands & Local Governments: A Source for Affordable Housing”  
<http://www.flhousing.org/wp-content/uploads/2015/09/Surplus-Lands-and-Local-Governments.pdf>
- “Surplus Lands for Affordable Housing”

---

<sup>4</sup> A parallel statute, F.S. §166.0451, applies to municipalities in Florida.

Collier County's Preliminary Surplus Real Estate for Affordable Housing list identifies six properties for affordable housing development. These properties include:

- Two properties on Livingston Road, which total more than 20 acres but are not developable due to utility easements.
- One property in Naples Manor on Confederate Drive. This property does not meet LDC residential lot width requirements and cannot be developed without some form of variance waiver.
- Three properties that would provide suitable sites for affordable housing development.

To determine if additional properties could be added to the list of surplus properties suitable for affordable housing, Coalition staff used GIS mapping software and data files obtained from the Collier County Property Appraiser to analyze all 57 County-owned surplus properties. Of the 51 surplus properties not on the list of lands suitable for affordable housing, only 2 additional properties have a property use code that would permit housing development. One property, 3571 Carson Road, is located in Immokalee. It is likely that the number of properties that escheat to the County is low because strong private demand exists for tax-delinquent properties.

**Table 3. Zillow Listings of Residential Lots for Sale in Immokalee**

Address (All properties are in Immokalee 34142)	Acres	Price	Number of days listed on Zillow	Lot Width
NW of Eustis Ave and S 1st St intersection	0.13	\$99,000	87	~50
408 Carver St	0.15	\$19,900	130	50
1238 Arden Ave	0.29	\$12,900	177	~60
On Jones St near E Eustis Ave	0.14	\$14,000	72	~40
1320 Peach St	0.16	\$26,900	97	50
316 School Dr	1.93	\$99,500	45	~200
309 S 1st St	0.22	\$99,800	72	~40
381 Lakeshore Dr	3.78	\$85,000	228	~200
Lightner Dr	1.24	\$74,900	170	~170
407 S 1st St	0.13	\$99,900	423	~50

Search date: May 9, 2016

Search parameters: For Sale, Up to \$100,000, Lots/Land, Immokalee FL

Since surplus County properties are not a major resource for affordable housing development in Immokalee, we reviewed the market for privately owned parcels that are suitable for development or

redevelopment. With a brief Zillow search, we identified 10 vacant residential lots with prices below \$100,000 (excluding four lots in the Arrowhead development). The lot at 316 School Drive is advertised as an optimal site for an affordable housing development (see Table 3 below).

**RECOMMENDATION #64:** The County should consider a land purchase initiative for affordable housing development, especially in the Immokalee area. By purchasing developable parcels when their prices are relatively low, the County can take them out of the speculative market and make them available to local nonprofit developers for low to no cost. CRA funds would be appropriate for this purpose. As a best practice, land purchased by the County or the CRA should be donated to a Community Land Trust (see Section III).

## Summary and Concluding Recommendations

- The Housing Element of Collier County's Growth Management Plan contains several policies calling for data collection and analysis related to affordable housing. The Community and Human Services Division, and any other departments and divisions involved in these data collection efforts, are advised to develop a systematic plan for updating these datasets, plans, and inventories.
- The Housing Element should provide a framework for progressive land use policies, such as supporting Accessory Dwelling Units (ADUs), preventing displacement when rehabilitating substandard housing, providing impact fee waivers or substantial reductions for affordable housing, and assessing impact fees on a per-square-foot rather than a per-unit basis. Alachua County provides a successful example of a per-square-foot impact fee schedule.
- The Immokalee Area Master Plan, a component of Collier County's Growth Management Plan, would benefit from an update to ensure consistency with the current Housing Element. The Master Plan could also be revised to provide expanded guidance for farmworker housing and explicitly encourage ADUs.
- The Master Plan contains several policies for data collection and research efforts, including surveys, reports on farmworker housing needs, and research on incentives and policies for creating affordable housing on vacant, foreclosed, or developable privately-owned parcels. The County should ensure that these policies are implemented on a regular basis.
- The Master Plan should provide a framework for addressing slum and blight created by nonconforming or substandard mobile homes and mobile home parks.
- The Immokalee Area Redevelopment Plan, which guides the Collier County Community Redevelopment Agency's activities in the Immokalee Redevelopment Area, was last updated in 2000. It is due for a thorough review to identify progress made on its goals and objectives, and incorporate new goals and objectives to address current concerns.
- Going forward, it is recommended that the CRA contribute additional funds for affordable housing development, thereby complementing financial contributions from the County, private developers and other stakeholders. The CRA should pursue cost-effective options for updating

the Immokalee Redevelopment Area Plan that leave ample funds remaining for affordable housing development.

- Collier County's use of SHIP funds is governed by a Local Housing Assistance Plan (LHAP). The current LHAP was recently updated to include Rental Rehabilitation and Rental Acquisition strategies, which will play an important role in rehabilitating Immokalee's housing stock. The LHAP update that takes effect in July 2016 has several new strategies, including a Rental Development strategy that can be used to provide vital gap financing for State Apartment Incentive Loan (SAIL) and Low Income Housing Tax Credit (LIHTC) developments.
- Going forward, it is recommended that the County make technical revisions to its LHAP Rental Rehabilitation, Rental Acquisition, and Rental Development strategies to extend the affordability period from 15 years to 50 years.
- Collier County's Land Development Code (LDC) translates the broad policies of the Housing Element and other land use planning documents into specific regulations. The LDC contains several provisions to incentivize affordable housing, including an Affordable Housing Density Bonus program, impact fee deferrals, and flexibility in zoning regulations such as parking and setback requirements.
- The provisions and implementation of the Affordable Housing Density Bonus ordinance could be improved in several ways, such as ensuring that the ordinance is not bypassed by weaker, post hoc affordability agreements with the County; adding flexibility to the process for determining rent and sale prices; clarifying the formula for calculating resale prices of affordable owner-occupied units; extending the affordability periods from 15 to 50 years; and requiring developers who back out of affordable housing commitments to relinquish their density bonuses. Ultimately, the AHDB would be most effective as a mandatory inclusionary housing ordinance.
- The County should ensure that when PUD developers back out of commitments to pay affordable housing contributions, they also relinquish any benefits that the County provided in return for those commitments.
- The regulatory environment for affordable housing development in Immokalee could be improved by certain other revisions to the LDC, such as expanding provisions for farmworker housing, allowing modular homes to be built outside of mobile home parks, adding flexibility to lot size and width requirements, and reducing or waiving certain development-related fees. Additionally, the County, the CRA and their partners should invest in water and sewer connections to address the issue of failing septic tanks on many of Immokalee's residential properties.
- Code enforcement in Immokalee and Collier County as a whole is largely reactive in nature. Stakeholder feedback suggests that code enforcement complaints in Immokalee primarily address unpermitted housing renovations and substandard or non-conforming mobile home properties. The former can be addressed in part by educating Immokalee residents about the presence of Growth Management Department staff in the community, and establishing a Community and Human Services Division staff presence in Immokalee. The latter requires a concerted effort to document code enforcement complaints about mobile home parks and enforce basic health and safety standards, such as accessibility to first responders when distress calls are received.



- As required by state law, the County maintains an inventory of County-owned surplus properties that are suitable for on-site affordable housing development, or could be sold to raise affordable housing funds. The current inventory is limited, and a review of County-owned properties that are not on the inventory list revealed only one residential property in Immokalee. An alternative to using surplus County lands for affordable housing in Immokalee would be for the County to purchase privately owned lots and make them available to nonprofit developers.

## Concluding Observations and Recommendations

1. As this section has demonstrated, the policy documents that govern land use planning in Immokalee contain numerous provisions for periodic data collection, research, and reporting efforts, some of which span more than one County department or division. These provisions can quickly become overwhelming if they are addressed individually, rather than as part of a systematic data collection plan.

**RECOMMENDATION #65:** It may be beneficial for the Community and Human Services Division to work with the relevant divisions of the Growth Management Department to develop a comprehensive data collection schedule. If it is determined that certain data collection policies are onerous or do little to advance affordable housing development, they should be stricken from their respective policy documents during periodic updates.

2. Land use policies have little value if they are not implemented, and updating and expanding land use planning documents should not be an end in itself. When the County adds or expands provisions for Accessory Dwelling Units, farmworker housing, and other affordable housing priorities, these policies should provide a foundation for more detailed Land Development Code provisions, which should remain “on the radar” of County staff. Strong land use planning documents can help compensate for the loss of institutional knowledge as old County staff members leave and new ones take their place.

**RECOMMENDATION #66:** Implementation of land use planning policies and regulations will be greatly facilitated by a culture of collaboration among the Community and Human Services, Comprehensive Planning, and Development Review Divisions. Review of the County’s land use planning documents, including those for the Immokalee Redevelopment Area, should be part of the orientation process for new staff members of these divisions.

3. The importance of addressing the code enforcement issues with Immokalee’s substandard and nonconforming mobile home parks cannot be overstated. This issue arose repeatedly when Coalition staff consulted with Immokalee stakeholders, and contributes strongly to the perception of slum and blight conditions in Immokalee. The success of other affordable housing and

redevelopment activities in Immokalee, such as enticing professionals in the “workforce” income range to relocate to the community, may hinge on the County’s success in addressing these problematic mobile home parks.

**RECOMMENDATION #67:** The Florida Housing Coalition does not provide legal advice, but we strongly recommend that the County consult with qualified legal counsel about balancing health and safety issues surrounding Immokalee’s mobile home parks with private property rights (see **RECOMMENDATION #62**).

4. Many of the issues and suggestions raised in this section are likely to be revisited in the development of the Comprehensive Housing Plan authorized by the Board of County Commissioners on March 1, 2016. For example, we proposed replacing the voluntary Affordable Housing Density Bonus with a mandatory inclusionary housing ordinance, and the Immokalee Area Master Plan requires the County to research the use of land banking, land grants, and tax incentives for private landowners as mechanisms to promote affordable housing development in Immokalee.

**RECOMMENDATION #68:** Once the County selects a consulting firm to lead the development of the Comprehensive Housing Plan, we encourage that firm to review the land use policy tools proposed in this section and incorporate them as appropriate into their final recommendations.

## Section V: Strengthening Collier County's SHIP Program

In addition to working with Immokalee stakeholders to build their capacity for meeting housing needs, the Florida Housing Coalition is currently providing technical assistance to Collier County's Community and Human Services (CHS) Division staff on improving the County's SHIP program. This technical assistance is sponsored by the Florida Housing Finance Corporation, and has served to complement the Coalition's work in Immokalee. As a result of these efforts, the County's SHIP program will provide funds for a wider array of housing activities, and program administration will be more streamlined for both developers and beneficiaries—outcomes that are essential for effective implementation of the recommendations provided in the preceding sections.

The most notable outcome of the Coalition's work with County SHIP staff was the introduction of two new assistance strategies to the County's Local Housing Assistance Plan (LHAP) for the use of SHIP funds. Previously, the LHAP only allowed SHIP funds to be used for purchase assistance, rehabilitation of owner-occupied homes, and disaster relief. The new strategies include:

**Rental Acquisition:** This strategy provides SHIP funds for the acquisition and rehabilitation of properties to serve as affordable rental housing, with a preference for developments serving people with special needs. Nonprofit and for-profit developers may receive up to \$300,000 for property acquisition and up to \$30,000 per unit for rehabilitation. The rehabilitated units must be offered at affordable rents to very low-, low-, and moderate-income households. SHIP assistance is provided to the developer as a 0% interest loan, and the rental units must remain affordable for 15 years.

**Rental Rehabilitation:** Under this strategy, nonprofit or for-profit owners of existing rental units may receive up to \$30,000 per unit for rehabilitation, with a maximum total award of \$500,000. The rehabilitated units must be offered at affordable rents to very low-, low-, and moderate-income households. Similar to the Acquisition/Rehabilitation strategy, SHIP assistance is provided to the developer as a 0% interest loan, and the rental units must remain affordable for 15 years.

To date, the Coalition has provided several additional services to County SHIP staff:

- Provided guidance to SHIP staff on working with the County Finance Department to obtain details about revenues, expenses, and administrative costs related to SHIP activities
- Provided training on income certification
- Provided training to SHIP staff on topics including serving people with special needs, best practices for existing SHIP strategies, and determining income eligibility of program applicants
- Worked with SHIP staff to ensure effective management of active SHIP purchase assistance and owner-occupied rehabilitation cases

- Helped SHIP staff identify potential nonprofit partners for SHIP rehabilitation strategies (the previous nonprofit partner, Centro Campesino, no longer operates in Collier County)
- Assisted SHIP staff with tracking and reporting of expenditures to ensure transparency and accountability
- Provided training to SHIP staff on implementation of the new SHIP strategies for rental rehabilitation

The Florida Housing Coalition, in providing SHIP technical assistance to CHS staff, has helped the division to identify and resolve potential roadblocks to approving applicants for SHIP assistance and providing payments to developers and contracts. With improved efficiency and the addition of two new rental strategies, SHIP may help developers to provide a higher volume of affordable housing in Immokalee than they had previously. As explained in Section IV, the County's new Rental Rehabilitation and Rental Acquisition strategies could be improved by expanding the affordability period. Although the SHIP Statute and Rule only mandate a 15-year affordability period, 50 years is ideal for affordable rental housing.

## Conclusion

As a low-income rural community with a sizeable farmworker population, Immokalee has housing and community development needs that are distinct from those of Collier County's coastal communities. Some of these needs must be addressed by activities and resources that target Immokalee specifically, while others must be addressed by changes in Countywide policies and practices. Above all, the County and Immokalee's many stakeholders must continue their efforts to improve collaboration. Collier County's Community and Human Services (CHS) Division obtained a HUD Rural Capacity Building grant because it seeks to provide leadership in identifying gaps, eliminating duplication of efforts, and cultivating a community of affordable housing developers with a capacity that is equal to the scale of Immokalee's affordable housing needs.

The Florida Housing Coalition provided technical assistance to CHS under the Rural Capacity Building grant. This report synthesizes publicly available data on Immokalee's housing needs with qualitative feedback collected by Coalition staff from County employees, for-profit and nonprofit affordable housing developers, social service providers, and other stakeholders. Coalition staff also contributed to the Affordable Workforce Housing Workshop held on March 1, 2016, and reviewed the land use policy and regulatory documents that affect affordable housing development in Immokalee. The Coalition's work under the Rural Capacity Building grant has dovetailed with its ongoing technical assistance to the County's State Housing Initiatives Partnership (SHIP) program staff.

Several major themes have emerged from the Rural Capacity Building project:

1. As a low-income community, Immokalee has a high number of households that are paying more than they can afford for housing or live in overcrowded conditions. Most of the households with housing problems in Immokalee are extremely low-income (ELI), meaning that their incomes are no more than 30% of the area median income (AMI). However, potential demand also exists for housing targeted to professionals in the "workforce" income range (80% to 120% AMI).
2. The exterior conditions of Immokalee's housing stock improved immensely between 2004 and 2011, but several dozen deteriorated and dilapidated units remain. The new Rental Rehabilitation and Rental Acquisition strategies in the SHIP Local Housing Assistance Plan (LHAP) will provide additional financial resources for improving Immokalee's housing stock. Strategies to expand rehabilitation efforts in Immokalee include advertising the presence of a Growth Management Department staff person in Immokalee, establishing a CHS presence in the community, and conducting outreach to local residents and stakeholder agencies.
3. The number of nonprofit affordable housing providers that are active in Immokalee has dwindled in recent years. However, the two nonprofit developers that remain are capable and well-respected, and several other nonprofits in the region have expressed an interest in serving Immokalee. Nonprofit developers who are active in Immokalee, or have been in the past, identified several impediments to housing development in Immokalee—including a perceived lack of leadership, gaps in coordination among the multiple County departments involved in housing

development, problems with timely reimbursement from County affordable housing funds, and limited funding for housing subsidies. Although the County has made considerable improvements to its affordable housing activities, staff from CHS and other divisions may need to conduct active outreach to dispel these outdated negative perceptions.

4. For-profit and nonprofit developers alike can be hampered by an insufficient understanding of the regulations governing affordable housing development, the financial and policy tools available to them, and even the populations they are serving. The County can dispel much of this confusion by helping to establish standard definitions for terms like “workforce housing” and educating developers on additional subsidy sources for both development and down payment assistance.
5. Land use policies and regulations are an essential vehicle for making affordable housing financially feasible and integrating it into the broader community. Our recommendations for land use provisions include replacing the voluntary Affordable Housing Density Bonus with a mandatory inclusionary housing ordinance, encouraging the formation of Community Land Trusts (CLTs), authorizing Accessory Dwelling Units (ADUs) in all residential zoning districts, and targeting Immokalee for waived or reduced impact fees, among others. We encourage the consulting firm tasked with developing the Comprehensive Housing Plan to consider each of these recommended policy tools.
6. The conditions of certain substandard or nonconforming mobile home parks are a particularly pressing land use issue in Immokalee. If these conditions are not addressed, they threaten to undermine many other housing and community development goals in Immokalee, such as attracting professional workforce households. The County is encouraged to assertively enforce basic health and safety standards within the limits of the law, providing financial assistance for property upgrades if necessary.

Many of the suggestions in this document are not highly complex or novel. For the Community and Human Services Division, expanding the reach of its affordable housing programs in Immokalee can be as simple as distributing brochures, attending meetings held by local service providers or faith-based organizations, listening to concerns from community residents, and having meetings or telephone calls with developers. Successful affordable housing programs are made possible as much by the “soft” work of relationship-building as by bricks and mortar or money.

Cultivating relationships is conceptually simple, but it requires staff time and commitment. CHS has already made strides in cultivating these relationships by working with the United Way, Immokalee-based nonprofits, and other stakeholders, and played a leading role in the Affordable Workforce Housing Workshop on March 1, 2016. Fortunately, CHS is expecting the addition of a dedicated staff member to continue these efforts.

Ultimately, the success of affordable housing development in Immokalee and Collier County as a whole depends on the commitment of elected officials. It is essential for County staff to have streamlined internal processes and effective partnerships with private, nonprofit, and faith-based stakeholders, but it is not enough. The support of County Commissioners will embolden County and CRA staff to pursue the most appropriate and innovative solutions to Immokalee's housing and community development problems.

The County Commission has already contributed greatly to this effort by soliciting public input and authorizing a Comprehensive Housing Plan with all options on the table. Once the Housing Plan and its recommendations are developed, it is vital for the Commission to heed the data on local housing needs and the wishes of those families who are struggling to find decent affordable housing in Immokalee. In addition, Immokalee residents rely on their State Legislators to advocate for full appropriation of the Sadowski State and Local Housing Trust Funds for housing. If Collier County's leadership oversees a transformation of Immokalee, they will make the County a model for redevelopment initiatives throughout Florida.

## Appendix A: Overcrowding and Incomplete Kitchen or Plumbing Facilities in Immokalee Units\*

### OWNER HOUSEHOLDS

Income Bracket	All Owner Households	Moderately Crowded**		Severely Crowded**		Incomplete Plumbing/Kitchen	
		Number	% of HHs in Income Bracket	Number	% of HHs in Income Bracket	Number	% of HHs in Income Bracket
≤30% AMI	575	100	17%	10	2%	0	0%
30.01% to 50% AMI	305	55	18%	0	0%	0	0%
50.01% to 80% AMI	395	75	19%	70	18%	0	0%
80.01% to 100% AMI	175	60	34%	0	0%	0	0%
>100% AMI	340	40	12%	0	0%	4	1%
<b>Total</b>	<b>1790</b>	<b>330</b>	<b>18%</b>	<b>80</b>	<b>4%</b>	<b>4</b>	<b>0.2%</b>

### RENTER HOUSEHOLDS

Income Bracket	All Renter Households	Moderately Crowded**		Severely Crowded**		Incomplete Plumbing/Kitchen	
		Number	% of HHs in Income Bracket	Number	% of HHs in Income Bracket	Number	% of HHs in Income Bracket
≤30% AMI	1115	135	12%	95	9%	25	2%
30.01% to 50% AMI	600	220	37%	25	4%	15	3%
50.01% to 80% AMI	255	80	31%	0	0%	0	0%
80.01% to 100% AMI	125	0	0%	0	0%	0	0%
>100% AMI	205	25	12%	50	24%	0	0%
<b>Total</b>	<b>2300</b>	<b>460</b>	<b>20%</b>	<b>170</b>	<b>7%</b>	<b>40</b>	<b>2%</b>

(Source: HUD CHAS 2008-2012)

\*The data on crowded households and households with incomplete plumbing/kitchen facilities includes households that are also cost burdened.

\*\*The moderately and severely overcrowded households in these tables have complete plumbing and kitchen facilities.



## Appendix B: Methodology for Figures in Text

Figure 4

1. Based upon data from the Shimberg Center for Housing Studies, recent market studies, and personal communication from local stakeholders, the affordable housing units that are in service or under construction in Immokalee were identified (see table):

Development Name	Subsidized Units	Tenure
Bromelia Place	30	Rental
Collier Village	30	Rental
Crestview Park	208	Rental
Crestview Park II	96	Rental
Cypress Run	39	Rental
Eden Gardens	51	Rental
Eden Gardens II	37	Rental
Eden Gardens Supportive Housing	4	Rental
Esperanza Place	48	Rental
Faith Landing	42	Owner
Farm Worker Village	561	Rental
Garden Lake Apts	65	Rental
Heritage Villas Of Immokalee Ltd	41	Rental
Immokalee Apts	100	Rental
Jubilee Community	89	Owner
Main Street Village	79	Rental
Oakhaven	160	Rental
Sanders Pines	40	Rental
So Villas Immokalee	35	Rental
Summer Glen	45	Rental
Timber Ridge Of Immokalee	34	Rental
Willowbrook Place	41	Rental

2. We calculated the number of subsidized units that are occupied and vacant:

- The Collier County Housing Authority informed us that 380 Farm Worker Village units and all Collier Village units are occupied.

- All Jubilee Community homes are assumed to be occupied. A recent market study described Faith Landing as a development in progress with 42 occupied units, and we assumed that these 42 units comprise the total that are ready for occupancy in Faith Landing.

- To estimate the occupancy rate of the remaining developments, we calculated the average occupancy rate for the Immokalee developments listed in Florida Housing Finance Corporation's 2012 Occupancy Report (90%). Using this occupancy rate, we estimated that 1,038 of the remaining 1,153 units are occupied.

- Total occupied subsidized units:  $380 + 30 + 89 + 42 + 1,038 = 1,579$
  - Total vacant subsidized units:  $181 + 115 = 296$
3. To calculate the number of occupied market-rate units, we subtracted the estimate of occupied subsidized units from the total number of occupied units (from 2008-2012 HUD CHAS):
    - $4,090 - 1,579 = 2,511$

4. To calculate the number of vacant market-rate units, we subtracted the estimate of vacant subsidized units from the total number of vacant units (from American Community Survey 2012 5-year estimates):

$$2,069 - 296 = 1,773$$

5. Housing demand data is derived from 2008-2012 HUD CHAS data.

**Notes:**

- We included farmworker developments in our housing supply calculations because many farmworker households are likely to be included in HUD CHAS data. The CHAS data is derived from the American Community Survey, which collects data throughout the year and classifies respondents as residents if they “are living at the sample address at the time of the interview and ... have lived or plan to live at that housing unit for more than 2 months,” according to the U.S. Census Bureau:  
<http://www.census.gov/content/dam/Census/library/publications/2009/acs/ACSRsearch.pdf>
- We excluded Horizon Dormitory from this analysis because the CHAS data includes “regular” housing units only, excluding dormitories and other group quarters.
- The Florida Housing Finance Corporation does not provide Occupancy Reports for years prior to 2011, and it is likely that occupancy rates were lower during the Recession years of 2008 to 2011. By using the 2012 occupancy data alone, we attempted to strike a balance between consistency with the use of 2008-2012 CHAS data (the most recent available) and relevancy to the subsidized apartment market in 2016. As Section II describes, local stakeholders report occupancy rates well above 90% for privately owned subsidized units. However, only 115 units of this type were estimated to be vacant in the analysis above, so the error from using an outdated occupancy rate is small.

**Figure 6**

1. Based on information from recent market studies and feedback from the Collier County Housing Authority and other local stakeholders, we identified affordable units that are expected to come online in the next few years (see table below), and assumed that all these units would be complete and occupied by 2020. The Arrowhead development was not included because the breakdown of its 186 proposed affordable units by tenure is unknown. However, the units to be built in the Eden Park owner-occupied development and the First Assembly PUD may serve families above 80% AMI, thereby overestimating the units available to “low-income” households.

Development	Units	Tenure	Notes
Faith Landing	122	Owner	Habitat for Humanity development in progress
Eden Park	50	Owner	Subject of a recent market study
First Assembly PUD	60*	Rental	In planning stages
Esperanza Place	128	Rental	In progress; development parcels recently changed ownership
Hatchers Preserve	18	Rental	Under construction
Eden Park	80	Rental	Subject of a recent market study
Farm Worker Village	145	Rental	Vacant units with planned renovations

\*Includes 25 units affordable to low-income households with Essential Service Personnel (ESP) workers, and 35 units affordable to ESP households with incomes up to 150% AMI. Excludes 87 units for ESP households at any income level.

- To project Immokalee's 2020 population, we used both American Community Survey and Decennial Census data. Immokalee's population in the 2014 5-year ACS was 24,021, and the average annual increase between 2011 and 2014 was 1,191 households. Between the 2000 and 2010 Decennial Census, Immokalee's population increased by 439 people per year on average. We used the average of these two annual increase rates – 815 people per year – to project a 2020 population of 28,911.
- Using the average household size of 5.16 from the 2014 5-year ACS, we estimated that Immokalee will have 5,603 households in 2020.
- Using a 43% homeownership rate from the 2014 5-year ACS, we estimated that 2,409 households would be owner-occupied and 3,194 households would be renters. (Note: Immokalee had a nearly identical homeownership rate in 2012.)
- We assumed that the shares of owner and renter households that were low-income and severely or moderately cost burdened would be the same in 2020 as in the 2008-2012 HUD CHAS data. We used the proportions in the table below to estimate the numbers of severely and moderately cost burdened owner and renter households:

Tenure	Estimated Households in 2020	% Low-Income, Severely Cost Burdened	Low-Income, Severely Cost Burdened Households in 2020	% Low-Income, Moderately Cost Burdened	Low-Income, Moderately Cost Burdened Households in 2020
Owner	2,409	24%	580	14%	337
Renter	3,194	30%	944	26%	819

## Appendix C: Rents at Selected Subsidized Housing Developments in Immokalee

### Collier County Housing Authority Properties

#### **Farm Worker Village**

- For the 276 units that have been released from the requirement to rent to farmworkers, rents are \$544 per month.
- For the 285 units still subject to the requirement to rent to farmworkers, the table below shows current monthly rents and the applicable rents once renovations are complete:

Bedrooms	Current	After Renovation
1	\$ 435	\$ 475
2	\$ 486	\$ 550
3	\$ 517	\$ 627
4	\$ 544	\$ 649

#### **Collier Village**

Monthly rents are as follows:

- 1 bedroom: \$435
- 2 bedrooms: \$466
- 3 bedrooms: \$517
- 4 bedrooms: \$544

### Market Study for Eden Park – Esperanza Apartments

The market study, conducted by Meridian Appraisal Group, Inc. in 2015, analyzed rents for the subsidized rental developments in the table below (left). The average gross rents for these developments are shown in the table to the right:

Bromelia Place
Crestview Park
Crestview Park II
Eden Gardens
Esperanza Place
Main Street Village
Oakhaven
Sanders Pines
Summer Glen
Timber Ridge Of Immokalee

Bedrooms	Average Gross Rent
1	\$ 406
2	\$ 752
3	\$ 868
4	\$ 1,000

## Appendix D: List of Recommendations

The recommendations made throughout the report are listed below. There is considerable overlap among several recommendations, since the same guidance applies in multiple contexts.

**1.** Develop and maintain a robust system for renovating Immokalee's existing housing units. This strategy would help owners and renters on fixed incomes reduce the utility portion of their housing costs; allow elders and people with disabilities to make their homes accessible and age in place; address exterior maintenance needs documented by the 2011 *Housing Condition Inventory* (particularly roof repairs); and address interior health and safety improvement needs that are not captured in available data.

The following actions would support a strong rehabilitation program in Immokalee:

- In the Owner-Occupied Rehabilitation, Rental Rehabilitation, and Rental Acquisition strategies included in Collier County's Local Housing Assistance Plan (LHAP) outlining the use of SHIP funds, include a funding preference for properties in Immokalee.
- Use the *Housing Condition Inventory* to identify the most dilapidated or deteriorated units in Immokalee, and prioritize these units for rehabilitation assistance.
- Enlist the assistance of Code Enforcement to address deficiencies and identify homes that would be suitable for owner-occupied home repair programs.
- Disseminate information among Immokalee residents and stakeholders about the County's existing home rehabilitation programs. In particular, the County should assertively advertise the fact that the Growth Management Department holds office hours in Immokalee.
- Assign a dedicated staff person to Immokalee at the 7th Avenue Building or another convenient location to provide assistance to residents seeking home repair or other housing-related information.
- Distribute brochures, applications, and other marketing materials about the County's housing programs at community centers, social service organizations, employment assistance centers, faith-based organizations, and other locations within Immokalee.
- Increase engagement with stakeholders by regularly attending Immokalee Interagency Council meetings and other relevant community meetings.

**2.** In addition to SHIP funds, several other funding sources and initiatives could be used to support home rehabilitation in Immokalee:

- The Weatherization Assistance Program (WAP) is a block grant from the U.S. Department of Energy that funds home energy efficiency improvements for households with incomes up to 200% of the federal poverty level. WAP is administered in Florida by the Department of Economic Opportunity, which provides grants to local governments, community action agencies, and nonprofits to administer to qualified households. More information may be found at the following link: <http://www.floridajobs.org/community-planning-and-development/community-services/weatherization-assistance-program>.

- The County should explore additional leveraging for rehabilitation which can be provided through:
  - Property Assisted Clean Energy (PACE) program: <http://www.pacenation.us/pace-programs/>
  - Florida Division of Emergency Management's Residential Construction Mitigation Program: <http://www.floridadisaster.org/mitigation/RCMP/index.htm>
- Some Habitat for Humanity affiliates provide home repair services to low-income families. The County may be able to encourage the local Habitat affiliate to offer home repair assistance.
- The County and local nonprofit rehabilitation providers could contact national corporations such as Home Depot and Lowe's to provide sponsorships in the form of direct financial assistance or in-kind donations. Additionally, both Home Depot and Lowe's offer competitive grants on a regular basis. The County and its partners could also work with local employers to provide cash, in-kind, or volunteer assistance for rehabilitation activities.
- A model organization for amassing corporate donations and volunteer labor for home repair is Rebuilding Together, which has affiliates throughout the nation. The County could encourage the formation of a Rebuilding Together affiliate in Southwest Florida, possibly with the assistance of neighboring counties.

**3.** Prioritize County Federal funding to Immokalee by designating Immokalee as a target geography within the Consolidated Plan for Community Development Block Grant (CDBG) and HOME funds received from HUD.

**4.** Efforts to expand Immokalee's affordable housing stock through new construction and rehabilitation should include deep subsidies for extremely low-income (ELI) households whenever possible, since these households have the highest need. Programs such as the Low Income Housing Tax Credit (LIHTC) and the State Apartment Incentive Loan (SAIL) programs are not enough by themselves to make rental units affordable to ELI households. Whenever possible, ELI rental housing developments should offer amenities that make them an attractive housing alternative to severely cost burdened ELI owners, some of whom may be unable to feasibly maintain homeownership. However, investments in deeply subsidized housing should be coordinated with local economic development strategies, which are ultimately designed to reduce the number of ELI households.

**5.** Ensure that affordable housing developers know how to access all Florida Housing Finance Corporation (FHFC) programs. These funds are available through a competitive Request for Application Process (RFA) posted on [www.floridahousing.org](http://www.floridahousing.org). County staff should sign up for announcements on the FHFC WebBoard and encourage interested developers to do the same.

**6.** Ensure that local developers, realtors, and lenders are aware of all the down payment assistance options available for low- and moderate-income buyers of affordable homes, including:

- Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) funds

- Florida Housing Finance Corporation Single Family Bond assistance
- Mortgage Credit Certificates

7. Ensure that affordable housing developers are aware of training and technical assistance through the Florida Housing Finance Corporation’s Catalyst program as well as national training opportunities.

8. Low-income, moderately cost burdened renter households should be targeted for efforts to increase homeownership in Immokalee. Appropriate strategies may include creating new affordable units through new construction and rehabilitation, as well as providing purchase assistance and homebuyer counseling. To market these programs, the County should partner with organizations that already provide services to these households to distribute flyers, conduct social media campaigns, and host community events for prospective homebuyers. Additionally, County representatives should attend meetings and events held by Rural Neighborhoods, the Immokalee Interagency Council, and other local organizations to make announcements about options for low- and moderate-income first-time homebuyers.

9. Develop “workforce housing” priced for low- and moderate-income professional workers who commute to Immokalee from elsewhere. Since Immokalee has fewer amenities than coastal Collier County or Lee County to attract professionals, a pilot project would be wiser than massive workforce housing development in the near term. This strategy could be expressed as “build a little bit and see if they come.” Marketing for a workforce housing pilot should be focused on households with long commutes, particularly those from high-cost areas of the state.

10. Even on a pilot basis, a workforce housing development in Immokalee should not be undertaken without conducting a market study first. The County should commission, provide financial support for, or otherwise support a market study, which should:

- Identify the number of potential buyers in the income bands targeted by the homes to be constructed.
- Obtain information from local realtors on the supply of existing homes for sale at prices affordable to these income bands, and the amount of time that these homes stay on the market before being purchased. (For example, if the existing homes in good condition are on the market for a relatively long time before being purchased, it would indicate weak demand for homes affordable to these income bands.)
- Work with local employers to identify professional employees in the “workforce” income range, and conduct focus groups and surveys with these employees to determine the circumstances in which they would consider buying a home in Immokalee.
- Obtain feedback from the sales department of the Ave Maria development on the factors of the development (e.g. design features of the houses, neighborhood amenities, location) that entice low- and moderate-income professional households to buy homes there, as opposed to elsewhere.

If the market study shows potential demand for workforce housing in Immokalee, one of the County’s developer partners should construct a “spec home” based on feedback about the design features desired

by workforce homebuyers in the area. Additionally, the County should work with local developers to identify the incentives or funding sources, if any, that they need to make the workforce homes affordable, aside from what the County already offers.

To increase market demand for these homes, a workforce housing strategy should be coordinated with local strategies to develop Immokalee's cultural and economic life, to help make Immokalee an attractive and enticing community for low- and moderate-income professionals.

**11.** The County would benefit from having additional affordable housing developers in the area, especially those that focus on rental and ownership development for demographics not served by Rural Neighborhoods and Habitat for Humanity of Collier County. Underserved demographics include special needs households, renters and homebuyers between 60% and 140% AMI, and Extremely Low-Income (ELI) renters.

The County is encouraged to actively foster relationships with these organizations and others that may be interested in adding housing development to their business line. We recommend that the County initiate discussions to ascertain what real and perceived barriers they feel exist in developing affordable housing. The County should ask these organizations about the tools, funding, training, strategies and incentives they would need to increase the affordable housing supply.

**12.** The County is encouraged to coordinate with the HA to target funding to HA units that are currently vacant and lack designated funding for future repairs. The County should determine why the HA did not apply for funding during a recent round of solicitations, and should assist the HA as needed to overcome any barriers that may have prevented them from applying.

Since this proposed repair effort has the potential to return a large number of affordable units to the rental market, the County may consider structuring a competitive funding proposal that contains a preference for larger projects and/or rental housing in Immokalee.

The Request for Proposal or Request for Application process can be driven by the County to target funds to areas of greatest need. Data from the Consolidated Plan should be used to support such targeting.

**13.** The County should study alternatives that would result in more widespread use of the AHDB program or comparable affordable housing commitments. These alternatives may include:

- Amending the AHDB ordinance to provide greater flexibility, allowing it to be used for developments that have already obtained PUD approval.
- Adding language to the Land Development Code requiring that affordable housing agreements formed outside the AHDB process should have certain minimum features that would have been required under the AHDB.
- Coordinating with the Development Review Division to ensure that the issue of affordable housing commitments is addressed in the preapplication stages for developers seeking PUD approval or other approvals.
- Replacing the AHDB ordinance with a mandatory inclusionary housing ordinance.



**14.** In cases where a developer makes affordable housing commitments in exchange for increased density—whether pursuant to the AHDB process or through a separate process—the County should work with the developer during the crafting of the agreement to determine if monetary subsidies (from the County or another source) are needed to allow the developer to offer the income-restricted units at an affordable price. When a developer is provided with a density bonus, the proceeds from the extra units should ideally allow the developer to offer affordable units to the designated income brackets without the need for additional subsidy. However, for homebuyers with incomes substantially below the designated income bracket, down payment assistance from SHIP or other County or state programs may be needed to make the homes affordable. (See [RECOMMENDATION #6](#))

**15.** The County, when issuing Requests for Proposals, should strategically target funds to Immokalee by using the data provided during the Consolidated Planning process, including public comments and the information provided in this report. In addition, funding should be targeted to HA-owned units in Immokalee that are currently vacant and lack designated funding for repairs. The Consolidated Plan allows for designated target geographies based on data and need. (See [RECOMMENDATIONS #3](#) and [#12](#).)

In addition, a complete neighborhood revitalization plan could be commissioned, although the County should carefully assess whether the cost of such a plan is prudent at this time.

**16.** Efforts by individual County departments and divisions (e.g. CHS, Community Redevelopment Agency, Growth Management) to address affordable housing needs in Immokalee and Collier County as a whole are sometimes performed in isolated “silos.” These departments and divisions should continue their efforts to improve communication and coordination, possibly with the assistance of Visio process mapping software. The departments and divisions involved in affordable housing should ensure that they are all familiar with the land use and affordable housing policies and regulations provided in documents such as the Growth Management Plan’s Housing Element, the Land Development Code, the Immokalee Area Master Plan, and the SHIP Local Housing Assistance Plan (see Section IV for a detailed discussion of these documents).

**17.** CHS can expand Immokalee residents’ awareness of and access to County affordable housing programs by working with local social service agencies to provide information, distributing brochures and other marketing materials, using social media, and dedicating a staff person to hold office hours in Immokalee. (See [RECOMMENDATIONS #1](#) and [#8](#).)

**18.** It would be beneficial for CHS and the CRA to actively educate affordable housing developers and other stakeholders about the efforts they have undertaken in recent years to promote affordable housing and community development.

**19.** It would be beneficial for the County to educate nonprofits on the requirements for seeking reimbursement of expenses from state and federal funding sources. The County should also streamline internal processes so that reimbursements are provided in a timely manner.

The County would benefit from additional outreach to housing providers in an effort to strengthen and/or rebuild these important relationships.

**20.** The County should periodically review crime statistics to determine the accuracy of the allegations regarding drug use and crime at affordable housing developments. Should the County find that the allegations are accurate, efforts should be made to coordinate with management, police and tenants to develop a plan for improvement.

**21.** The County should work with the property owner, manager, tenants, neighbors and other community stakeholders on a plan to improve the reputation of the Oakhaven affordable housing development.

In addition, the County should stay abreast of monitoring reports for affordable rental projects located in Immokalee and be prepared to proactively address any noted concerns. The County should request to be added to the interested parties list for all Collier properties funded by FHFC. The contracted monitoring agents are currently First Housing, Amerinational and Seltzer Management.

**22.** To increase the size and stability of its SHIP grant, the County's legislative delegation should advocate for full funding of the Sadowski Housing Trust Funds. Full funding of SHIP would increase the County's allocation from approximately \$2.1 million to approximately \$2.25 million, and would increase Naples' allocation from approximately \$130,000 to an estimated \$225,000.

**23.** Common terminology regarding affordable housing should be used by all stakeholders so that specific issues are well understood. Definitions for terms such as "affordable housing" and "workforce housing" should be established in the ongoing collaboration among the County, the United Way, the Community Redevelopment Agency, the Affordable Housing Advisory Committee, Immokalee nonprofits, and elected officials.

**24.** An ongoing leadership team consisting of government and private for-profit and nonprofit stakeholders should be formed to advance Immokalee affordable housing initiatives in a coordinated manner. An additional staff person has recently been authorized for the Department to assist in this effort.

**25.** Going forward, the Department is advised to put a process in place for ensuring that the *Affordable/Workforce Housing Population Based Index Model Methodology* document is reviewed and updated regularly.

**26.** To ensure ease of implementation of **RECOMMENDATION #25**, the Department may wish to alternate between relatively simple updates and comprehensive updates on a semi-annual basis, with the latter being conducted annually. Six months after each comprehensive update, the Department could review the most recent local data on home sale prices and rental prices and vacancies. Data from sources such as the Southwest Florida Apartment Association are less comprehensive than the U.S. Census Bureau or HUD data used by the Shimberg Center for Housing Studies, but are more current.

Regarding the comprehensive update methodology, the Department may wish to provide more detail on moderate and severe housing cost burden by tenure and income bracket, using projections available from the Shimberg Center. Annual comprehensive updates are also an appropriate time to assess whether the studies required by Policies 1.1 through 1.4 are successful in supporting affordable housing initiatives.

**27.** It is recommended that the responsible County departments coordinate efforts to ensure that Policies 1.5 and 1.11 of the Housing Element are implemented on a regular basis. For Policy 1.11, an annual or semi-annual review of the affordable housing inventory should be considered. Similar to the recommendations for Policies 1.1 through 1.4, the responsible departments should periodically assess whether the implementation of Policies 1.5 and 1.11 are successful in supporting affordable housing initiatives.

**28.** Policy 2.4 of the Housing Element should specifically require the County to review existing codes and ordinances for positive or negative impacts on affordable housing development, and to amend these documents as needed to facilitate the development of housing for low- and moderate-income residents.

**29.** A complete waiver or substantial reduction of impact fees for affordable housing developments for low- and moderate-income households would have a much greater impact in decreasing development costs and incentivizing affordable housing than providing impact fee deferrals. Deferring the impact fee over a given amount of time does not reduce the cost of development, and the repayment of the fee remains a part of the development's financial constraints. Another powerful mechanism for reducing the cost of housing would be to charge impact fees per square foot of residential development, rather than per unit. This approach is currently used by Alachua County, and incentivizes the development of smaller, lower-cost housing units.

**30.** The Housing Element should include provisions for data collection and ongoing evaluation of substandard housing conditions, which should be implemented in a coordinated fashion by the responsible County departments, with a specified timeline for completion and periodic updates.

**31.** Policies 4.2 and 8.1 of the Housing Element should include provisions for retaining affordable housing stock. To ensure that rehabilitation, demolition, and code enforcement activities do not erode the affordable housing supply in Immokalee and other parts of Collier County, Policies 4.2 and 8.1 should encourage the use of affordability restrictions and investment of County affordable housing funds for home rehabilitation or reconstruction, as appropriate. At a minimum, these restrictions should apply to any housing unit receiving County rehabilitation funds.

**32.** An objective allowing and encouraging the use of Accessory Dwelling Units to create variety in Immokalee's housing stock and expand affordable housing options should be added to the Housing Element.

**33.** CHS should collaborate with the County's Comprehensive Planning Section and other responsible departments to ensure that capital improvements in Immokalee are prioritized.

**34.** Assertive marketing of the presence of County Planning staff in Immokalee may reduce the incidence of Immokalee residents failing to obtain proper permits for rehabilitation of homes and other structures. It is recommended that CHS staff regularly attend meetings of the Immokalee Interagency Council and engage with Rural Neighborhoods on community events in the Eden Park/Esperanza neighborhoods to spread awareness about the availability of County Planning staff in Immokalee.

In addition, the Community and Human Services Division could build upon the Growth Management Department's work in Immokalee by establishing its own presence in the community. CHS could utilize the 750 South 5<sup>th</sup> Street building as a Housing Resource Center, providing information and applications for purchase assistance, home repair programs, and other housing-related services. (See **RECOMMENDATIONS #1** and **#8**.)

**35.** The responsible County departments should coordinate efforts to ensure that Policies 2.2.1, 2.2.2, and 2.4.3 of the Immokalee Area Master Plan are implemented on an annual or semi-annual basis, or are amended to provide new guidance. It may be useful to address these policies, particularly Policy 2.2.2, in the forthcoming Comprehensive Housing Plan.

**36.** The Immokalee Area Master Plan should expand on Housing Element provisions for regulatory incentives and County housing funds to support farmworker housing, such as providing adequate infrastructure (Policy 2.12) and using CDBG and SHIP funds in a complementary fashion (Policy 8.4). In addition, explicit guidance should be provided on suitable types of farmworker housing for the zoning districts described in the Master Plan.

**37.** Update the Immokalee Area Master Plan's policies to permit ADUs in all residential districts, as a measure to create variety in Immokalee's housing stock and expand affordable housing options.

**38.** The Immokalee Area Master Plan should provide guidance for addressing slum and blight created by nonconforming or substandard mobile homes and mobile home parks. The Plan may propose strategies such as enhanced enforcement of health and safety regulations and/or financial incentives to mobile home park owners to bring their properties into compliance with existing codes.

**39.** The Immokalee Redevelopment Area Plan is due for a thorough review and update, including updates of references to the Housing Element. The Redevelopment Area goals and objectives should be revised to reflect progress made since 2000 as well as current issues and concerns in Immokalee. The CRA and its partners should also review the progress made on specific tasks outlined in the current plan, some of which have target dates over 20 years old.

**40.** We recommend that the Collier County CRA expand its investment in "bricks and mortar," residential land purchases, and other activities directly related to affordable housing development. To fully implement the Immokalee Redevelopment Area's provisions for affordable housing investment, the CRA depends on the active support of the County's elected officials.

41. Table One in Section 4.10 of the Immokalee Redevelopment Area plan should be revisited, with funding sources identified for unfinished housing activities. Going forward, this table should be updated on an annual basis.

42. To fulfill **RECOMMENDATION #39** for a thorough update, the CRA should consider adoption and implementation of the proposed document revision performed by the hired consultant firm in 2012. If at all possible, the document should be reviewed as a full replacement to the existing CRA Plan, with minor revisions as needed. Going forward, it is recommended that the CRA use consultants that charge considerably lower fees—no more than \$50,000 as a “rule of thumb.” This practice will free up funds for affordable housing development and rehabilitation.

43. The County should make a technical revision to the Rental Development, Rental Rehabilitation, and Rental Acquisition strategies in the Local Housing Assistance Plan to require a 50-year affordability period.

44. As **RECOMMENDATION #13** proposed, The County should study alternatives that would result in more widespread use of the Affordable Housing Density Bonus (AHDB) program or comparable affordable housing commitments. These alternatives may include:

- Amending the AHDB ordinance to provide greater flexibility, allowing it to be used for developments that have already obtained PUD approval.
- Adding language to the Land Development Code requiring that affordable housing agreements formed outside the AHDB process should have certain minimum features that would have been required under the AHDB.
- Coordinating with the Development Review Division to ensure that the issue of affordable housing commitments is addressed in the preapplication stages for developers seeking PUD approval or other approvals.
- Replacing the AHDB ordinance with a mandatory inclusionary housing ordinance.

45. Instead of requiring that developers specify rents and sale prices of affordable units should be eliminated, the AHDB ordinance should provide flexible language requiring that agreements reference a schedule of price limits that will be in effect at the time the units are ready for occupancy (e.g. HUD rent limits specified by bedroom size). To clarify the program’s intent and provide guidance on setting prices, the County should consider adding regulatory language similar to §67-37.005(5)(e) of the SHIP Rule, which allows for households to pay more than 30% of their incomes for housing, within certain limits.

46. The procedure in the AHDB ordinance for setting a home’s resale price during the affordability period should be clarified. Rather than requiring the home to be sold at an “affordable” (30% of income) price to the next income-qualified buyer, it would be best to provide a formula for calculating the exact resale price. Unlike the formula in §2.06.04(A)(9) and (10), the resale formula should explicitly result in a

resale price that is less than the home's market value, while providing a fair return to the seller (e.g. 25% of the market appreciation over the price that the seller paid for the home). Rather than conveying funds to the County for future affordable housing development, this formula would capitalize the value of the County's initial density bonus into a subsidy for the next homebuyer by reducing the sale price below market rate.

**47.** The affordability period for units created pursuant to the AHDB should be extended from 15 years to 50 years.

**48.** The responsibility for verifying whether prospective buyers or tenants of affordable AHDB units are income-qualified should be shifted to County staff or a subrecipient, to minimize the bureaucratic burden for the developer.

**49.** County staff should review whether any developers have been allowed to use density bonuses after being released from affordable housing obligations.

**50.** Once the County hires a consultant to develop a Comprehensive Housing Plan, County staff should work with the consultant to develop specific recommendations for a mandatory inclusionary housing ordinance to take the place of the voluntary AHDB. To minimize the cost of compliance for developers, the maximum density in the County's base residential zoning districts should be increased.

**51.** County staff should evaluate whether the Land Development Code's limited provisions for farmworker housing constrict the supply to a level below what is needed, or whether other housing types provided in other districts are able to meet this need, even if they are not classified as "farm labor housing" under the LDC. If necessary, provisions for "farm labor housing" should be expanded in the LDC.

**52.** The Land Development Code should permit modular homes wherever single-family homes are permitted.

**53.** It is strongly recommended that the CRA and appropriate County divisions (e.g. CHS, Code Enforcement) encourage the Board of County Commissioners to pass a resolution in support of active enforcement of the Immokalee Urban Overlay District provisions. As an alternative, the BCC is encouraged to approve a revised ordinance for the Immokalee Urban Overlay District that is legally defensible and addresses concerns of property owners, while preserving the spirit of the original ordinance. The ordinance would be best implemented through a phased process, which may require financial assistance from the County (see [RECOMMENDATION #36](#)).

**54.** County staff should review whether the County's regulatory and administrative provisions for zero lot line configurations, reduced parking and setback requirements, and reduced street widths offer sufficient flexibility to allow affordable housing development on Immokalee's nonconforming lots. If

necessary, the provisions of the Immokalee Urban Overlay District should be expanded to provide this flexibility.

**55.** The Land Development Code should explicitly permit Accessory Dwelling Units in all residential zoning districts. Additionally, the County should revise the LDC to relax side and rear setback requirements (§4.02.00) as they relate to the placement of ADUs.

**56.** Section 10.02.13(E)(3)(c) of the Land Development Code should stipulate that developers who ask to be released from affordable housing contribution requirements, will relinquish any benefits that the County provided in exchange for that affordable housing contribution.

**57.** Impact fees in Immokalee should be reduced or waived whenever possible, rather than merely deferred. Since the entirety of Immokalee is a Community Redevelopment Area with a determination of blighted conditions, it would be appropriate to target fee waivers to property owners wishing to construct or rehabilitate housing in Immokalee. If the County pursues this option, it should identify funding sources to compensate for lost fee revenue. Additionally, Collier County should charge impact fees per square foot of residential development rather than per unit, an approach taken by Alachua County. (See [RECOMMENDATION #29](#)).

**58.** Immokalee's needed water and sewer improvements will only be accomplished through a significant capital improvement investment by the County and the South Florida Water Management District, leveraged with CRA, state, and federal funding.

**59.** The County should raise awareness about the presence of Growth Management Department staff in Immokalee, and should establish a presence of Community and Human Services Division staff in the community (see [RECOMMENDATION #34](#)). This would help Immokalee property owners obtain proper authorization and/or County funds for home repairs.

**60.** The *Housing Condition Inventory* study should be updated. If it is not feasible to conduct a complete update at this time, the County should commission a comprehensive survey of the exterior conditions of mobile homes in Immokalee.

**61.** The County should analyze data on code enforcement complaints addressed in the past year to determine the frequency and nature of complaints related to mobile home parks. This data should inform the scale and the specific elements of a County effort to secure compliance from owners of substandard or nonconforming mobile home parks.

**62.** County divisions involved in maintaining housing quality and compliance, including CHS, Comprehensive Planning, Development Review, and Code Enforcement, should work with the County Attorney to build a case for strong enforcement of local codes in Immokalee's nonconforming and substandard mobile home parks. In particular, the County should seek qualified legal advice to determine

how to strike a balance between the County's police powers to protect health, safety, and welfare, and protections for private property owners.

**63.** The County should propose strategies to correct substandard and nonconforming conditions in Immokalee's mobile homes and mobile home parks, which may include expanded enforcement efforts and/or financial incentives to mobile home park owners (see [RECOMMENDATION #38](#)). The proposed strategies should balance principle and practicality. That is, as a matter of principle, the County should not be forced to bear the cost of correcting deficiencies on properties owned by parties with the financial means to do so themselves. However, as a matter of practicality, the County must recognize that the owners of deficient mobile homes and mobile home parks would likely pass on the cost of correcting deficiencies to their tenants, who would no longer be able to afford these units. It may not be ideal for the County to spend public funds to help landowners correct these deficiencies, but it would protect the tenants of these mobile homes from displacement. Moreover, the public costs of correcting these deficiencies could be offset by reduced taxpayer expenditures on Fire, Sheriff, and Health Department responses to emergencies in these mobile home parks.

**64.** The County should consider a land purchase initiative for affordable housing development, especially in the Immokalee area. By purchasing developable parcels when their prices are relatively low, the County can take them out of the speculative market and make them available to local nonprofit developers for low to no cost. CRA funds would be appropriate for this purpose. As a best practice, land purchased by the County or the CRA should be donated to a Community Land Trust.

**65.** It may be beneficial for the Community and Human Services Division to work with the relevant divisions of the Growth Management Department to develop a comprehensive schedule for implementing data collection provisions in the Housing Element of the Growth Management Plan, the Immokalee Area Master Plan, the Immokalee Redevelopment Area Plan, and other planning documents. If it is determined that certain data collection policies are onerous or do little to advance affordable housing development, they should be stricken from their respective policy documents during periodic updates.

**66.** Implementation of land use planning policies and regulations will be greatly facilitated by a culture of collaboration among the Community and Human Services, Comprehensive Planning, and Development Review Divisions. Review of the County's land use planning documents, including those for the Immokalee Redevelopment Area, should be part of the orientation process for new staff members of these divisions.

**67.** The Florida Housing Coalition does not provide legal advice, but we strongly recommend that the County consult with qualified legal counsel about balancing health and safety issues surrounding Immokalee's mobile home parks with private property rights (see [RECOMMENDATION #62](#)).

**68.** Once the County selects a consulting firm to lead the development of the Comprehensive Housing Plan, we encourage that firm to review the land use policy tools proposed in Section IV of this document and incorporate them as appropriate into their final recommendations.



## References

---

- <sup>1</sup> Roy, A.L. and Raver, C. 2014. Are All Risks Equal? Early Experiences of Poverty-Related Risk and Children's Functioning. Journal of Family Psychology 28 (3): 391-400.
- <sup>2</sup> Newman, S.J. 2008. Does Housing Matter for Poor Families? A Critical Summary of Research and Issues Still to be Resolved. Journal of Policy Analysis and Management 27 (4): 895-925.
- <sup>3</sup> Evans, G.W. 2006. Child Development and the Physical Environment. Annual Review of Psychology 57: 423-451.
- <sup>4</sup> Newman 2008.
- <sup>5</sup> Greg Schell, Migrant Farmworker Justice Project, personal communication, October 2015.
- <sup>6</sup> Barbara A. Cacchione Consulting, Inc. 2011. *Immokalee Housing Condition Inventory, 2011*. Prepared for the Immokalee Housing Collaboration and the Immokalee Community Redevelopment Agency.
- <sup>7</sup> Dottie Cook, Collier County Housing Authority, personal communication, December 2015.
- <sup>8</sup> Florida Housing Finance Corporation. 2013. *Entire Portfolio Occupancy Report 2012* [Excel spreadsheet]. <http://www.floridahousing.org/PropertyOwnersAndManagers/OccupancyReports/>. Retrieved 2/23/16.
- <sup>9</sup> Meridian Appraisal Group, Inc. 2015a. [Market Study for Eden Park – Esperanza Neighborhood Single Family Development] Provided on request by Rural Neighborhoods.
- <sup>10</sup> Shimberg Center for Housing Studies. 2015. [Affordable Housing Inventory] [http://filhousingdata.shimberg.ufl.edu/a/ahi\\_basic](http://filhousingdata.shimberg.ufl.edu/a/ahi_basic). Retrieved 2/23/16.
- <sup>11</sup> U.S. Department of Housing and Urban Development [HUD]. Comprehensive Housing Affordability Strategy [CHAS] 2008-2012 data.
- <sup>12</sup> Meridian Appraisal Group, Inc. 2015b. [Market Study for Eden Park – Esperanza Neighborhood Apartment Development] Provided on request by Rural Neighborhoods.
- <sup>13</sup> HUD CHAS 2008-2012.
- <sup>14</sup> HUD. 2011. [FY 2012 Income Limits] <https://www.huduser.gov/portal/datasets/il/il12/fl.pdf>. Retrieved 2/24/16.
- <sup>15</sup> HUD. 2013. [FY 2014 Income Limits] [https://www.huduser.gov/portal/datasets/il/il14/fl\\_RevSec8.pdf](https://www.huduser.gov/portal/datasets/il/il14/fl_RevSec8.pdf). Retrieved 2/24/16.