



ADMINISTRATIVE REPORT

Report Date: September 10, 2019
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VanRIMS No.: 08-2000-20
Meeting Date: October 22, 2019

TO: Vancouver City Council
FROM: General Manager of Arts, Culture and Community Services
SUBJECT: Housing Infrastructure Grant Framework Update

RECOMMENDATION

THAT Council approve the establishment of a \$25 million 2019-2022 Community Housing Incentive Program, as described in this report, to support the development and deepen the affordability of social and co-op housing projects led by non-profit housing providers.

Source of funding to be:

- \$8 million from the approved multi-year capital budget for Social Housing Infrastructure Grants;
- \$17 million from Empty Homes Tax revenue.

REPORT SUMMARY

This report proposes the establishment of the 2019-2022 Community Housing Incentive Program to increase the City's grant contribution towards non-profit and co-op housing projects offering deeper levels of affordability (e.g. more homes renting at income assistance and at BC Housing Income Limits, where the rent is geared to income. Each grant would be a capital contribution towards the construction of a non-profit or co-op housing project, subject to various conditions and future Council approvals, by not less than two thirds of all its members.

COUNCIL AUTHORITY/PREVIOUS DECISIONS

Council approval is not being sought in this report for specific grants. If the Recommendation above is adopted by Council, future grants from the Community Housing Incentive Program to specific housing providers would be brought forward for

Council consideration and approval by an affirmative vote of not less than two thirds of all its members pursuant to Section 206(1) of the *Vancouver Charter*.

- Housing Vancouver Strategy (2017)
- Affordable Housing Delivery and Financial Strategy (2018)
- 2019-2022 Capital Plan
- City of Reconciliation Framework (2014)
- Healthy City Strategy (2015)
- Women's Equity Strategy (2018)

CITY MANAGER'S/GENERAL MANAGER'S COMMENTS

With the on-going housing affordability challenges impacting many Vancouver residents, Council have directed staff to look for more targeted ways to enhance affordability outcomes. The launch of a new capital grant framework as part of a more holistic incentive program is a key way to deliver on the ambitious goals in *Housing Vancouver* and demonstrate to our partners that the City is willing to increase the amount of upfront equity contribution to improve viability and drive deeper affordability for new non-market and co-op housing projects. This program will also be streamlined to enable our housing partners to better leverage senior government and financing early on in the process. The proposed Community Housing Incentive Program also responds to the February 26, 2019 motion entitled "Changing Vancouver's Housing By-laws, Policies and Budgets to Achieve Real Housing Affordability". Therefore the General Manager, Arts, Culture and Community Services and the City Manager RECOMMEND approval of the foregoing.

REPORT

Background/Context

Housing Vancouver Strategy

Housing Vancouver sets a target of 12,000 new units of social, supportive and co-operative housing over the next 10 years to meet the needs of lower income residents. Of the 12,000 units, 2,000 are intended to be created in the form of co-ops and 4,100 are intended to be supportive housing. This target exceeds the social and supportive housing targets set in the previous Housing and Homelessness Strategy (2012-2021) by 50 percent.

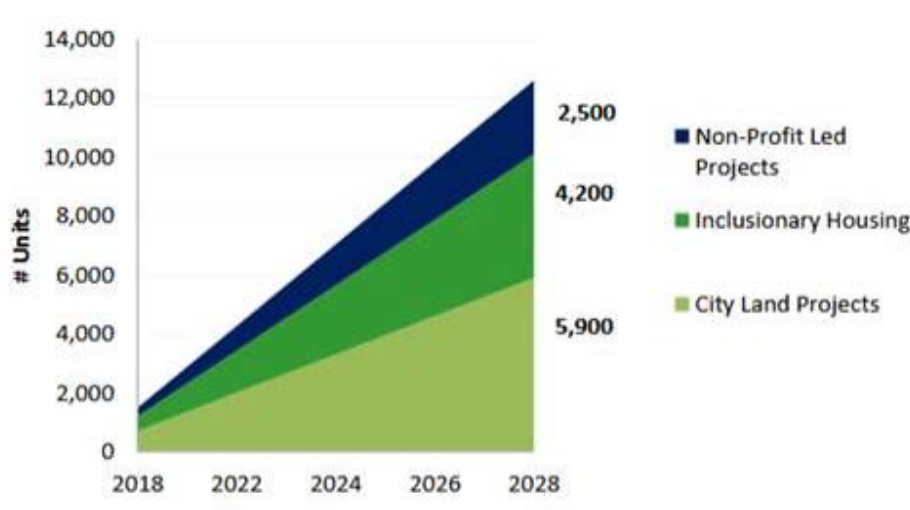
Affordable Housing Delivery and Financial Strategy

The Housing Vancouver Affordable Housing Delivery and Financial Strategy (2018) sets out key approaches to shift the City's delivery mechanisms to achieve the 12,000 units of social and supportive housing set out in *Housing Vancouver*. The Financial Strategy describes the City's three primary roles in housing delivery: as an equity partner through the deployment of city land and capital grants for affordable housing projects; as an advocate to identify local needs and investment opportunities for Provincial and Federal government partnerships and funding; and as a regulator to create policy to enable new development and redevelopment and to streamline development processes.

Achieving the Housing Vancouver targets for affordable social, supportive, and co-op housing will require significant financial and other commitments from the City and other entities, including the Provincial and Federal governments. Creating new homes affordable to lower-income residents, including homes rented at shelter rates, will require significant capital and ongoing operating revenue/funding and services to ensure long-term sustainability. As such, strategic partnerships and funding contributions from Provincial and Federal government and non-profit housing societies are crucial in meeting our social and supportive housing targets.

One key way the City delivers affordable housing is through ongoing collaboration with non-profit and co-op housing providers. They play a key role in delivery of new affordable homes both through operations over the life of the buildings on City or other Provincial/Federal government-owned land and in increasingly important ways such as in the creation of new projects through development or redevelopment of their own land. As such, strategic partnerships and funding contributions from the Provincial and Federal governments and non-profit housing providers are crucial in meeting our social and supportive housing targets.

Figure 1. Anticipated 10-year delivery of social and supportive units by delivery program



Some non-profit, co-op, or faith-based organizations may have the vision and capacity to support new affordable homes on their own land. Many existing non-profit and co-op housing providers may also be operating aging buildings that face significant reinvestment costs. In these cases, there may be the opportunity to create new housing on existing sites, or redevelop and expand the existing number of homes. The Affordable Housing Delivery and Financial Strategy specifically identifies the current Housing Infrastructure Grant program as a key tool to support non-profit-led affordable housing projects. The Strategy notes that through the further development of a new grant program, the City will seek to more intentionally and better align grant allocations with the housing needs and targets identified in Housing Vancouver.

Provincial & Federal Government Funding Context

The funding landscape into which the development of new affordable homes is being contemplated has changed significantly in the last couple of years. When the City first introduced its Housing Capital Infrastructure Grants, there were very few places for non-

profit providers to access grant funding for new projects. Over the last two years, there has been a renewed focus on affordable housing investments on the part of both the Provincial and Federal governments. Canada Mortgage and Housing Corporation (CMHC) introduced new financing and funding programs through the National Housing Strategy, enabling many non-profit organizations to access low-cost financing and increased up-front funding towards pre-development costs. In addition, the Provincial government introduced new and increased funding commitments (e.g. BC Housing's Community Housing Fund), covering both capital and operating funding. The launch of both of these new funds presents the City with an opportunity to re-examine its own support to projects through the use of regulatory authority, policy, land use and investment (e.g. grants) to best deliver new homes that meet the affordability levels laid out in Housing Vancouver. Many of these new government programs include increased affordability targets, with BC Housing seeking increased proportions of homes renting at income assistance and Housing Income Limits (HILs) levels through the Community Housing Fund and Indigenous Housing Fund.

As many non-profit and co-op-initiated projects have been able to leverage partner funding from several streams, it is anticipated that the updated Community Housing Incentive Program could be used to ensure project viability at improved levels of affordability or to further deepen affordability beyond that which was originally anticipated.

Role of City Housing Infrastructure Grants

The Affordable Housing Delivery and Financial Strategy specifically identifies the Housing Infrastructure Grant program as a key tool to support non-profit and co-op-led affordable housing projects. The Housing Infrastructure Grant program was introduced in 2015 and is administered by the City with grants approved by Council as required. The grant amounts are currently based on a "per-door" basis of \$10,000 per studio and 1-bedroom, \$20,000 per 2-bedroom or supportive housing unit, and \$30,000 per 3-bedroom unit, regardless of affordability level.

The 2015-2018 Housing Infrastructure Grant Program supported 10 projects with \$10.8 million of grants overall, contributing toward the development of 680 non-market homes. Of these 10 projects, three projects have completed and opened, five are currently under construction, and two are moving through the development process to construction. Appendix A provides a summary of the individual project grants and status. The previous grants typically made up less than 5% of the total cost to construct a project. While the grants contributed to the viability of projects, there was often minimal impact on affordability over the long term. However, at an average cost to the City of \$15,000 to \$20,000 per unit, the grants were a cost-effective way for the City to incentivize and contribute to new social and co-op homes. The timing of the grants and an ability to leverage partner funds also help to reduce the equity gap for affordable housing projects. With increased investments from Provincial and Federal levels of government, and an increased need identified in Housing Vancouver for homes offering deeper affordability, staff undertook a review of the existing grants program with the objective of increasing grant amounts and maximizing impact on affordability.

Strategic Analysis

Engagement with non-profit housing providers

To seek further feedback on the City's existing grant program, two engagement initiatives were undertaken. A survey was distributed to non-profit and co-op housing societies in the spring of 2019, soliciting input from the non-profit and co-op housing sector regarding development experience, capacity, and potential incentives to ensure project viability and success. In addition, a discussion with non-profit & co-op housing providers and development consultants was held on April 30th, 2019 and input was sought on the City's grant program.

Feedback received from the consultation was similar among the stakeholders and included the following key themes:

Grant timing:

- Earlier approval of grant would be helpful – this can help the non-profit partner to leverage other funding opportunities.
- Satisfaction with timing of grant payment (at Building Permit issuance).
- Could consider a phased grant payment approach, including pre development grants to help shape the initial scope of a project.

Grant amount:

- Should reflect current construction and development costs.
- Support for tiered approach (e.g. larger grant amounts for projects with more income assistance rate units).
- Satisfaction with per-door approach but suggestion to further increase grant amounts to further incentivize family units.

Grant prioritization:

- Support for grant towards low-to-moderate income households and target populations that may not fall under other funding programs.
- General support for increased funding towards projects delivering deeper affordability (e.g. income assistance rents, rent-geared-to-income).

In addition to the above, non-profits and places of worship also expressed interest in more resources to guide project development.

Lessons Learned From Other Jurisdictions

Discussions with other municipalities were undertaken to further understand how affordable housing granting programs work in other jurisdictions. Although the programs varied in scope, objective and/or type (funding vs. financing), some common themes emerged:

- Oversubscription of funds and the need to prioritize.
- Challenges with aligning funding strategies with provincial/state and federal programs.
- Annual funding call that outlines specific housing priority/focus.

- Housing projects must be viable or demonstrate how grants will contribute to viability.
- Established processes to recover funds if organizations are unable to deliver units.
- Increased funding opportunities for projects that achieve deeper levels of affordability.
- Applicants (e.g. non-profits and co-ops) appreciate the streamlining of application processes and coordination with other funding partners.
- Land acquisition costs are the most significant expense; programs that provide land or support non-profits to acquire sites are used to increase project viability.
- Housing providers would like more resources to build development capacity and assistance with navigating complex development/administrative processes.
- Funding disbursement schedules should better align with project timelines to minimize impact on overall project budget.

Updated Grant Framework

Staff have incorporated input from stakeholders along with lessons from the previous grant program and direction from the Affordable Housing Delivery and Financial Strategy into the proposed new Community Housing Incentive Program framework. The new framework focuses on delivering deeper levels of affordability in non-profit and co-op housing projects and allowing for earlier in-principle commitment of City contribution, all while reflecting the City's role and financial capacity to support non-profit and co-op housing projects.

Consistent with Council policies, all affordable housing projects are expected to be self-sustaining over the long-term, where rents are set at levels or operating subsidies are provided so that all costs will be covered including mortgage payments (to repay some or all of the construction costs), operating costs and capital replacement; without further operating subsidies, property tax exemptions, and/or financial guarantees from the City.

1 – Target support for deepening affordability

While the City's 2015-2018 Housing Infrastructure Grant Program provided grants based on fixed per unit amount of \$10,000 per studio and 1-bedroom, \$20,000 per 2-bedroom and \$30,000 per 3-bedroom unit, the updated grant framework proposes to increase grant amounts for housing projects that deliver greater affordability. To accomplish this, grants will be targeted to support the capital cost of HILs and Shelter Rate homes based on the net capital funding requirement of a proposed project.

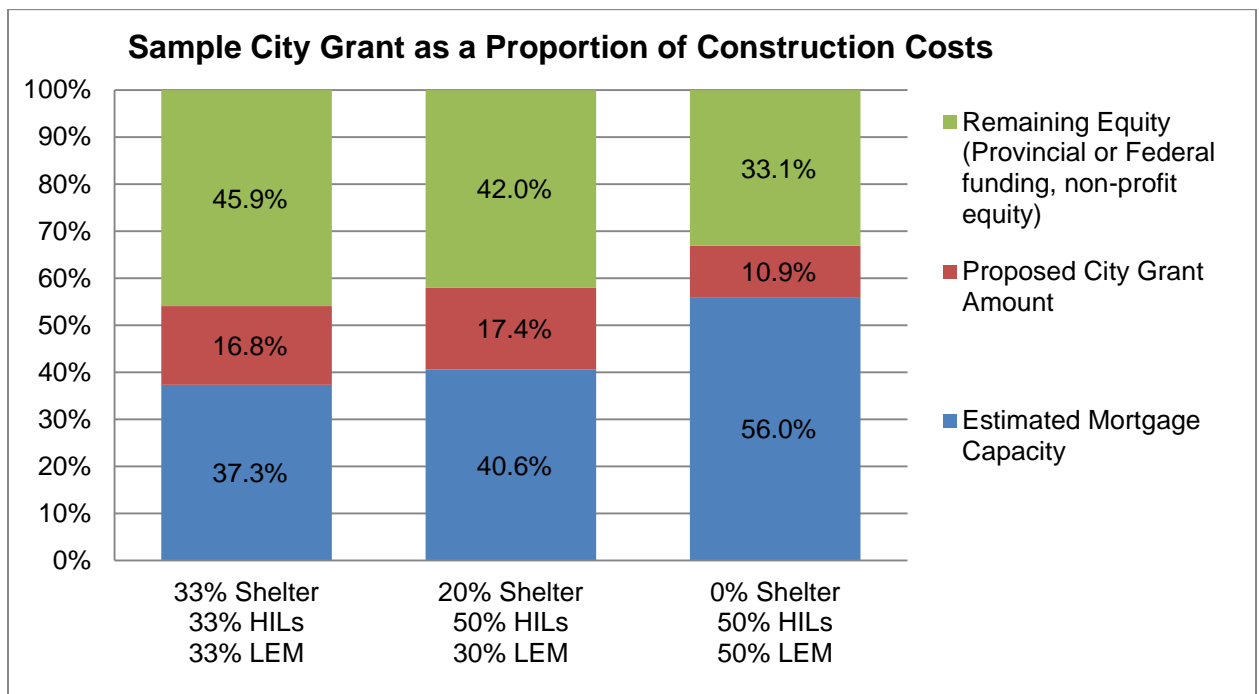
The net capital funding requirement of a project recognizes that units that deliver a deeper level of affordability have a lower mortgage capacity to repay construction loans. In the case of a Shelter unit where operating costs exceed rent revenues from the Shelter Rate of Income Assistance, the unit provides no mortgage capacity to repay the construction loan, and will likely require ongoing operating subsidies from other levels of government subject to the project's overall rental mix.

Generally speaking, there is less mortgage capacity and greater net upfront capital funding requirement for projects offering a higher proportion of homes at deeper levels of

affordability. The proposed new Community Housing Incentive Program will be able to provide capital contributions to projects with deeper affordability.

Under the program, the City’s contribution to project could reach up to 20% of the project construction costs, depending upon the depth of affordability secured. This significantly increased funding will incentivize and contribute towards deeper affordability in non-profit and co-op housing projects, especially for family sized (two- and three-bedroom) Shelter Rate and HILs units. However, this increased level of funding from the City does not reduce the need for both ongoing and additional Provincial and Federal government funding, and non-profit/co-op equity to fill the construction equity gap, as illustrated in Figure 2.

Figure 2: Sample Social/Co-op Housing Project Capital Costs



The grant amount for individual homes in a proposed project will be modelled using baseline assumptions including:

- Unit construction costs;
- Unit rents, operating, and maintenance expenses and financing cost to model a unit’s mortgage capacity; and
- An assumed level of Provincial/Federal government or other partner funding.

The new program also recognizes the ability of cross-subsidy within the project. Typically, homes that offer deeper levels of affordability, such as at Shelter Rates, may run operating deficits that would reduce the overall mortgage capacity of a project. These impacts are expected to be addressed through ongoing operating subsidies from senior governments and therefore not considered as part of the grant framework. Appendix B outlines the potential range of increased grant amounts.

To further focus the grant program on supporting affordability, the grant will be targeted only to non-market/co-op homes with rents affordable to households who earn up to BC Housing's Housing Income Limits.

2 – Signal intent to commit grant support earlier

To help non-profit and co-op societies leverage other funding opportunities, such as Provincial and Federal government funding, the proposed new program will allow the City to provide in-principle funding commitments to projects based on the proposed number of homes, types and affordability, estimated net capital funding requirement determined using baseline assumptions. As a project further develops, the funding commitment could be adjusted to reflect the updated project specifics, additional funding partner contributions, updated cost assumptions, or changes in the affordability levels, as agreed to by the project's partners.

3 – City's role in supporting affordable housing

To reflect the City's role and capacity in supporting development of affordable housing, the grant program includes an assumed level of Provincial and Federal government investment through BC Housing's Community Housing Fund program or CMHC's Co-Investment Fund. The proposed level of senior government support will be modelled at a minimum of \$100,000 per home, for the purposes of estimating the amount of upfront capital contribution from the City, given that the City's intent to advance our in-principle commitment earlier in a project timeline. The program will also include a cap on the grant for any single non-market/co-op home in a project to ensure the City's contribution is used to best position our housing providers to leverage the City's early in-principle commitment to a project and obtain Provincial and/or Federal government investments or other philanthropic financial support.

4 - Equity, Access and Reconciliation

As the City advances the development of an Equity Framework and continues the implementation of other equity related efforts (e.g. Women's Equity Strategy, TGV2S Inclusion Strategy), additional housing population priorities may be reflected in City targets and projects.

Equity – The Canada Council recognizes equity as “a principle and process that promotes just conditions for all persons to fully participate in society”. Equity involves identifying barriers, removing them, and accommodating the differences that people face. An intersectional approach to equity acknowledges that people who face multiple barriers will experience the compounding effects of marginalization.

The Housing Vancouver Strategy identifies protecting and supporting diversity across the city – of incomes, backgrounds, and household types – as a key objective. It states housing should promote equitable access to jobs, education, and other opportunities for economic prosperity for people of all ages, incomes, and backgrounds.

Accessibility – Housing Vancouver Strategy states that new housing types should incorporate design principles that meet the needs of Vancouver's diverse households and populations. One of the actions includes ensuring that an adequate share of new housing is accessible and meets the needs of people with mobility challenges,

disabilities and other groups with specific accessibility needs. The City also requires at least 5% of social housing units in City-owned airspace parcels/buildings must be accessible. The Federal and Provincial governments have also incorporated accessibility targets into funding and financing programs, acknowledging the need for affordable, accessible and secure housing.

City of Reconciliation – On June 25, 2014, Vancouver City Council formally acknowledged that the City of Vancouver is situated on the unceded traditional territory of the Musqueam, Squamish, and Tsleil-Waututh First Nations, and subsequently designated Vancouver as a City of Reconciliation to further strengthen the City's services and ongoing relationships with the First Nations and the urban Indigenous community. The City of Reconciliation long term goals include:

- Strengthen local First Nations and Urban Indigenous relations;
- Promote Indigenous peoples arts, culture, awareness and understanding; and
- Incorporate First Nations and Urban Indigenous perspectives for effective City services.

The Housing Vancouver Strategy identifies housing as an opportunity to advance our existing commitments as a City of Reconciliation. The strategies to advance cultural belonging as well as equity and prosperity for Indigenous people living in Vancouver must continue to strengthen the broader commitment to engage Indigenous partners and families, to reflect Indigenous culture across the city, and to align and support a longer-term strategy with housing goals and targets for Indigenous people across all incomes in the Metro Vancouver region.

The proposed 2019-2022 Community Housing Incentive Program will ask applicants to describe how their project meets equity, access and reconciliation objectives as part of the application and evaluation process. This information will allow this and future grant programs to evaluate alignment with the City equity, access and reconciliation objectives and impact to targeted groups and incorporate that analysis in to future updates to the grant programs. In addition, there may be future opportunities to target a set amount of funding towards housing population priorities (e.g. alignment with BC Housing's Indigenous Housing Fund).

5 - Updating and clarifying grant processes

Initial feedback indicated that grant recipients were generally satisfied with the existing grant program. However, the non-profit and co-op housing survey also indicated that a number of organizations were unaware that the City offered capital grants towards non-profit-initiated projects. Feedback around the grant process was generally positive, including timing of payment and rolling intake process.

As part of the updated grant program, some immediate actions can be taken to promote and clarify the updated grant process, including:

1. Creation of a program webpage outlining the application process, eligibility criteria, guidelines and project pro-forma template;
2. Workshop sessions with non-profit and co-op housing providers to review the updated grant program and walk through the application process; and

3. Formal launch of the new grant program in the coming months, in anticipation of new funding calls from the Provincial and Federal governments. This may allow non-profits to prepare submissions and leverage potential City grant funding to seek additional capital and operating funding from other levels of government/funding sources.

With respect to process, grant application intakes will continue on a rolling basis as many projects are in various stages in the development cycle. Stakeholders identified the desire to have earlier confirmation of grant funding to leverage with other funding partners, and greater certainty around project viability. In an effort to meet this need, staff are proposing to review projects through the new eligibility and application criteria and issue a preliminary grant funding confirmation letter (similar to BC Housing's funding process) subject to final Council approval. The grant application review will be undertaken, with the preliminary confirmation to be included in, or provided in close proximity to, the issuance of the rezoning enquiry response letter as part of the development approval process. The timing of payment is not proposed to change, with grant funds disbursed at building permit issuance.

Additional incentives to increase impact on affordable housing projects

A new and broader program, currently named the Affordable Housing and Community Spaces Incentive Program (AHCSIP), is being developed to support non-profit, co-op, and faith-based organizations interested in creating new affordable homes on their own land. Further work is being undertaken as part of AHCSIP to explore additional opportunities (e.g. development incentives, process improvements, and capacity support) to enable additional affordable homes through redevelopment or new projects. The details of this program will be brought forward to Council in 2020.

Supporting non-profit and co-op housing projects requires action from all partners. Initial economic feasibility analysis and conversations with non-profit, co-op, and faith-based organizations have indicated several key areas of work:

- Addressing the equity gap involved in delivering projects with deeper affordability, and in some cases replacing community serving spaces. The deepest levels of affordability, particularly shelter-rate units, may also require ongoing operating funds.
- Supporting non-profit, co-op, and faith-based organizations with developing the capacity to undertake development on their sites.
- Improving the process and time to deliver affordable housing.

Staff will also continue to explore the potential for new grant opportunities to further bolster the non-profit and co-op housing sector in delivering more affordable homes across the city. Further considerations include:

1. Examining whether there are sufficient pre-development funding opportunities for organizations interested in portfolio planning – additional funding could be utilized towards concept development around portfolio (re)-development, developing strategies for tenant relocation if needed, and initial pre-development costs to put forward a number of sites together for (re)-development.
2. Exploring opportunities and developing a framework to partner with non-profit and co-op housing providers to acquire properties adjacent to their existing sites

to increase (re)-development potential, and achieve more homes at deeper levels of affordability.

To address other components contributing to overall project affordability and feasibility (e.g. speed/processing time and additional density), staff are undertaking a review of the SHORT program which prioritizes rezoning and development applications with social & co-op housing components for expedited review. As part of the engagement with the sector, staff heard concerns around processing times for non-profit, social and co-op housing applications, and it was suggested that there could be a separate stream for non-profit and co-op applicants. The SHORT program is functioning as the channel for non-profit housing applications through the regulatory process, but further refinements and improvements could be made. In terms of land use and form of development, there are a number of City planning initiatives underway (e.g. City-Wide Plan, Broadway Corridor Plan) that have been directed to identify opportunities for affordable housing across Vancouver. Further work will be undertaken through these initiatives and the Affordable Housing and Community Spaces Program to determine the form of development for affordable homes in each community.

Financial Implications

Consistent with Council policies, all affordable housing projects are expected to be self-sustaining over the long-term where rents and/or external operating subsidies are set at levels that will cover mortgage payments (to repay some or all of the construction costs), operating costs and capital replacement; and do not require further operating subsidies, property tax exemptions, and/or financial guarantees from the City.

\$8 million was allocated as part of the 2019 Capital Budget. Staff propose to allocate \$17 million of Empty Homes Tax revenues to establish a \$25 million program to support development and deepen affordability of social housing projects led by non-profit and co-op societies during the 2019-2022 Capital Plan. Staff will bring forward the related budget adjustments as part of the regular budget process.

Prior to disbursement of the grants, the following steps are to be undertaken to ensure that the grant funds are used for the intended affordability outcomes:

- Council approval of grant;
- Execution of a Grant Agreement by the non-profit/co-op and the City;
- In most projects, registration of a Housing Agreement on title to secure affordability level of all homes;
- Confirmation of funding/financing sources for the development; and

If the above conditions are met, the funds will be released upon Building Permit issuance for the project.

CONCLUSION

The existing Housing Infrastructure Grant program has supported deeper affordability in non-profit and co-op housing developments over the past five years. The proposed new grant program will build on the success of the existing program, while addressing

feedback received from stakeholders about ways to improve the program moving forward. The proposed Community Housing Incentive Program is a vital new component of supporting non-profit, and co-op housing providers to assist in meeting the affordability goals laid out in Housing Vancouver. It is designed to best position our non-profit and co-op organizations to access investments from the Provincial and Federal governments, optimizing investment in affordability for Vancouver residents.

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SUMMARY OF 2015-2018 HOUSING INFRASTRUCTURE GRANTS PREVIOUSLY APPROVED BY COUNCIL

Approved	Address & Organization	Amount	Units	Status
Oct-2015	Community Builders Group - - 1060 Howe St.	\$1,000,000	100	Complete
May-2016	Salsbury Community Society - 1723 Victoria Dr.	\$240,000	26	Complete
Jul-2016	BC Housing - 288 East Hastings St.	\$1,040,000	104	Complete
Oct-2016	Atira Women's Resource Society - 420 Hawks Ave	\$350,000	21	Approved
Oct-2016	Catalyst Community Developments Society - 585 West 41 st Ave	\$620,000	46	Under Construction
Nov-2017	Fair Haven United Homes - 2720 East 48 th Ave	\$1,390,000	39	Under Construction
Dec-2017	Red Door Society - 870 East 8 th Ave.	\$1,060,000	51	Under Construction
Jul-2018	BC Housing - 33 West Cordova St.	\$1,600,000	80	Approved
Sep-2018	Union Gospel Mission - 616 East Cordova St.	\$1,590,000	63	Under Construction
Dec-2018	Vancouver Masonic Centre Association - 1495 W 8 th Ave.	\$1,910,000	150	Under Construction
Total		\$10,80,000	680	

MAXIMUM GRANT BY UNIT TYPE

Unit Types	City Grant per Shelter Rate / HILs Unit	2015-2018 Grant Program per Unit
Studio	\$35,000	\$10,000
1-bedroom	\$60,000	\$10,000
2 bedroom	\$100,000	\$20,000
3 bedroom	\$100,000	\$30,000
Overall max per unit	\$75,000	N/A

Note: The actual grant amounts will be determined based on the proposed project units and affordability breakdown, with a maximum grant calculated based on the above rate per Shelter or HILs unit. The 2015-2018 grant program supported social housing projects based on a simple per unit grant regardless of affordability level.

PROPOSED GRANT ESTIMATES UNDER VARIOUS SCENARIOS

Affordability Scenario Examples	Estimated City Grant
34 Shelter, 33 HILs, 33 LEM units	\$5.1 m
20 Shelter, 50 HILs, 30 LEM units	\$5.3 m
50 HILs, 50 LEM units	\$3.3 m
2015-2018 Grant Program	
All scenarios	\$1.7m

Note: The above estimated grant amounts are based off of example buildings of 100 units with varying affordability scenarios. The assumed family mix in these buildings is 20% studio, 30% 1-bedroom, 30% 2-bedroom, and 20% 3-bedroom units. The actual grant amounts will be determined based on the proposed project units and affordability breakdown, with a maximum grant based on the table above with an overall cap of \$75,000 per Shelter Rate and HILs units.