

Staff Report for Committee of the Whole Meeting

Date of Meeting: November 20, 2024 Report Number: SRPBS.24.103

Department:	Planning and Building Services
Division:	Policy Planning

Subject: SRPBS.24.103 - Request for Approval – Community Improvement Plan for Affordable Housing and Sustainable Design

Purpose:

To request Council's approval of the City of Richmond Hill Community Improvement Plan for Affordable Housing and Sustainable Design.

Recommendation(s):

a) That staff report SRPBS.24.103 regarding the Community Improvement Plan for Affordable Housing and Sustainable Design, be received;

b) That the Community Improvement Plan Project Area (Proposed By-law 133-24, attached as Appendix A to staff report SRPBS.24.103) and the Community Improvement Plan for Affordable Housing and Sustainable Design (Proposed By-law 134-24, attached as Appendix B to staff report SRPBS.24.103), be approved.

Contact Person(s):

- Chun Chu, Senior Planner, Policy, ext. 5493
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- Gus Galanis, Commissioner of Planning and Building Services, ext. 2465

Report Approval:

All reports are electronically reviewed and/or approved by the Division Director, Treasurer (as required), City Solicitor (as required), Commissioner, and City Manager. Details of the reports approval are attached.

Key Messages:

- Richmond Hill Council endorsed an Affordable Housing Strategy (2021) that recommends the implementation of a Community Improvement Plan (CIP) to incentivize affordable housing while implementing sustainable design measures.
- The final CIP for Affordable Housing and Sustainable Design is one of nine initiatives supported by and committed to as part of the Canada and Mortgage Housing Corporation (CMHC) Housing Accelerator Fund (HAF). The City has allocated up to \$13M in HAF grant funds for the initial implementation of the CIP. HAF funds must be spent by November 2027. No other funding sources have been committed at this time to support this project.
- The CIP is intended to support sustainably-built, affordable rental housing projects by providing for incentives that efficiently stack with financing programs available from senior levels of government. The final CIP was developed with support from an expert consulting team and in consultation with key stakeholders.
- The final CIP applies City-wide and is available to both private and non-profit developers that provide a minimum of five affordable rental housing units in development projects that contain 11 units or more and meet, at minimum, the Silver threshold in the City's Sustainability Metrics Program. In addition, rental units incentivized through the CIP must remain affordable for a minimum of 25 years at rents that are at or below 125% average market rent.
- Staff have been actively working to identify potential candidates for the CIP and are liaising with various local landowners and developers to discuss potential affordable rental housing incentives that may be available through Richmond Hill's CIP should it be approved by Council.
- Implementation of the CIP program is based on the CIP's four incentive streams which will be administered through intake windows for applications and based on evaluation criteria. City staff will promote the CIP program in Q1 2025.

Background:

Housing affordability is a growing concern across Canada and is particularly pronounced in urban centres such as the Greater Toronto and Hamilton Area. According to Census data in both 2016 and 2021, Richmond Hill had the highest proportion of households experiencing housing unaffordability out of the nine local municipalities in York Region. In 2021, more than half (51%) of all renter households and one-third (33%) of owner households in Richmond Hill were spending 30% or more of their income on shelter costs (Census 2021).

The City has undertaken various actions to address housing affordability in Richmond Hill, guided by the Council-endorsed Affordable Housing Strategy in 2021. The Strategy includes a recommendation to create a CIP to incentivize affordable and purpose-built rental housing and to encourage the retrofit of older rental buildings to improve accessibility and energy efficiency.

In addition to Richmond Hill's housing goals, Council's adoption of the City's Community Energy and Emissions Plan (CEEP) in 2021 provides guidance and actions to mitigate the impacts and contributions to climate change by ensuring new and existing buildings are designed and operated to reduce emissions over the long-term. Council also approved the City's updated Sustainability Metrics Program (SMP) in 2023, as a tool to advance sustainable design measures through new development. The CIP seeks to implement the financial incentives identified in the SMP's background research to support the delivery of both the City's affordable housing and sustainable design objectives.

The City committed to the development of the CIP for Affordable Housing and Sustainable Design as one of nine initiatives to be completed as part of the \$31.1M Housing Accelerator Fund (HAF) awarded to Richmond Hill by the Canada and Mortgage Housing Corporation (CMHC). Through the CIP project, the City aims to work in partnership with private market developers and non-profit housing providers to achieve the goals of the Affordable Housing Strategy and CEEP.

CIP Project Overview

The City retained N. Barry Lyon Consultants (NBLC) and ERA Architects ('consultant team') to support the CIP project in late 2022. These firms have experience and expertise in the design and delivery of financial incentive programs for housing and sustainable design. The CIP project was scoped into five phases as follows:

- Phase 1 (Q1 2023-Q2 2024): Background study
- Phase 2 (Q2 2024): Consultation with key stakeholders and steering committee
- Phase 3 (Q2 2024): Draft of CIP
- Phase 4 (Q2-Q3 2024): Public consultation and draft CIP revision
- Phase 5 (Q4 2024): Final CIP adoption and associated by-law approval

In Phases 1 and 2, the consultant team completed the CIP Background Report which identified community needs and best practices based on a jurisdictional scan. The background work included a pro forma analysis of the financial gaps for building affordable housing and sustainably designed buildings. The City also undertook targeted consultation with both private and non-profit housing providers. The project was guided by a steering committee comprised of applicable City staff and external partners including CMHC, staff from the Ministry of Municipal Affairs and Housing (MMAH), York Region, Toronto and Region Conservation Authority (TRCA), Windfall Centre, and Clean Air Partnership.

Phase 3 involved the development of the draft CIP. Based on analysis completed in the Background Study and input received from targeted consultation sessions and steering committee members, the key considerations for developing a viable incentive program were identified and included in the draft CIP.

As part of Phase 4, staff and the consultant team brought forward Staff Report SRPBS.24.076 and the draft CIP for Affordable Housing and Sustainable Design to a Council Public Meeting on June 25, 2024 for information and public comment.

In summary, the draft CIP included the following four incentives:

- 1. Development Fees/Charge Grant
- 2. Tax Incremental Equivalent Grant (TIEG)
- 3. Capital Funding Grant
- 4. Public Lands

The draft CIP included the following eligibility criteria:

- **Geograph**y: The draft CIP applies City-wide to capture all opportunities for the creation of affordable housing and sustainably designed buildings.
- **Housing Types:** Affordable rental housing projects which may contain 100% affordable units, or a mixed income project with a portion of the units being affordable.
- Number of Affordable Units Provided: A minimum of 15% of the units provided in a development must meet the definition of affordability, with a minimum project size of five (5) affordable units.
- Affordable Rent and Period: The maximum affordable rent is 125% of the average market rent, by bedroom type. Affordable units in a development project should remain affordable for at least 25 years.
- **Sustainable Design Threshold:** Projects should, at minimum, meet the Silver threshold in the City's Sustainability Metrics Program.
- Eligible Developers: Applicants may be private or non-profit developers. Partnerships between private and non-profit groups are also permitted and encouraged.

Additional details of background work completed as part of the development of the draft CIP can be found in Staff Report SRPBS.24.076 and its related appendices.

Discussion:

The following section summarizes the feedback received on the draft CIP which was presented to Council in June 2024, and describes the key changes made based on implementation considerations and comments received during this time.

Draft CIP Feedback

Further to the Council Public Meeting in June 2024, staff continued to engage with stakeholders and received additional comments on the draft as presented. The feedback received fell within three general categories, as follows:

- 1. the need for both improved clarity and increased flexibility related to incentive programs and relative eligibility criteria;
- 2. input related to how applications to the CIP might be evaluated; and,
- 3. various considerations related to the administrative processes and documents that will implement the CIP policy and incentive program.

To address feedback, City staff undertook significant research and consultation with members of the CIP working group, York Region and other jurisdictions who administer CIPs and/or related high value capital grants in support of affordable housing. This review sought to understand stakeholder experiences, lessons learned, and implementation best practices. As a result of this review, staff identified three key factors affecting the success of the CIP program including meeting HAF timelines, risk mitigation and administrative capacity. Below is a summary of challenges addressed through revisions to the CIP:

1. Housing Accelerator Fund (HAF) timelines

In 2023, the City was awarded \$31.1M through the Housing Accelerator Fund (HAF) administered by CMHC in support of accelerating housing supply. Staff have allocated up to \$13M of HAF funds to the initial implementation of the CIP. The CIP will prioritize projects that can achieve Building Permit issuance by November 2026 to meet the forecasted housing target requirements of the HAF. In addition, all HAF funds must be spent by November 2027, which means the CIP is restricted in its ability to fund applicants beyond HAF (November 2027) unless an additional funding source is identified. Currently, the City has not identified a permanent long-term funding source for the CIP. As such, staff have been actively working to identify potential candidates for the CIP in consideration of HAF timelines.

2. Risk Mitigation

Staff have identified various risks associated with the CIP administration and have worked to incorporate risk mitigation measures through all steps of the CIP administration process. For example, the final CIP requires that recipients maintain affordable rental units at an affordable rate for at least 25 years. As a result, the City will be advancing funds to eligible recipients at the beginning of this 25-year affordability condition. Additionally, as noted above, funds must be advanced prior to November 2027 which means funds may potentially be advanced prior to full construction. Identified risks to the City include funds being advanced to recipients who fail to maintain the 25-year affordability period commitments or to projects that fail to be built and occupied or that go into foreclosure within the 25-year term of the agreement.

In speaking with other jurisdictions with experience administering housing funding programs, all noted that the implementation of high value housing incentive programs comes with inherent risk. As such, staff has prepared a CIP policy and implementation approach that seeks to limit the risks to the City to the greatest degree possible in consideration of City finances, expertise, and staff resources. The following risk mitigation measures have been incorporated into the implementation processes of the CIP:

- Staff will outsource the economic/financial feasibility review of applications to external experts;
- The CIP evaluation criteria will prioritize applicants who are partnered with other levels of government, such as CMHC, to leverage risk analysis completed by bodies with the depth of expertise, experience and capacity the City does not have;
- The evaluation criteria will prioritize recipients that have experience in the building and operating of purpose-built rental housing and/or affordable housing;
- Legal agreements will be structured in such a way that the City may pursue funds owing through the existing property tax arrears collection process, should an applicant default on the agreement conditions; and,
- Staff will develop an annual reporting process for CIP recipients to ensure affordable units are maintained at the appropriate thresholds.

3. Administrative Capacity

The City's administrative capacity to implement and maintain new housing programs is limited. Unlike upper levels of government, Richmond Hill is not a Housing Service Manager and does not have a dedicated housing services division. As such, staff have designed a program that leverages existing processes and resources in order to streamline the delivery of the City's affordable housing priorities. Richmond Hill also continues to be in discussion with York Region regarding opportunities for future partnership and support as the CIP implementation proceeds.

Final Community Improvement Plan for Affordable Housing and Sustainable Design

The final CIP is guided by the following three principles:

- 1. It targets the most needed type of housing in the City, which is affordable rental housing;
- 2. It must be effective in bridging a substantial amount of the financial gap for projects that include affordable rental housing and sustainable design; and,
- 3. It ought to offer the best value for municipal dollars that are being invested through incentives.

The final CIP shall address HAF agreement commitments, include appropriate measures to mitigate risk to the City and streamline administration processes in light of limited staff resources and capacity within the organization. The CIP will be reviewed in five years to assess whether it is achieving its desired outcomes.

1. Base Eligibility Criteria

Base eligibility criteria to apply for CIP incentives are set out in Table 1 below. Although the general eligibility criteria remain largely unchanged from the draft, based on feedback from our development sector, the final CIP shall establish a fixed minimum of five affordable units (versus a proportion of the overall project as proposed in the June 2024 draft). Furthermore, additional criteria were included to ensure eligible applicants have financially viable projects and are in good standing with the City.

Eligibility Criteria	Description
Geography	The CIP applies City-wide.
Eligible Developers	The CIP is open to private and non-profit developers. Partnerships between private and non-profit providers are encouraged.
Housing Types	The CIP offers incentives to affordable rental units. Projects may contain 100% affordable units or be a mixed income project with a portion of the units being affordable. The project may contain residential use and non-residential uses.
Number of Affordable Units Provided	Eligible projects must be at minimum 11 residential units, with a minimum of 5 affordable units.
Affordable Rent	The maximum affordable rent is 125% of the average market rent, by bedroom type.
Affordable Period	Affordable units in a development project should remain affordable for at least 25 years.
Sustainable Design Threshold	Projects must meet at minimum the Silver threshold in the City's Sustainability Metrics Program.
Project Feasibility	The City reserves the right to require project pro forma / financial information to demonstrate project feasibility.
Good standing with the City	Applicants must be in good standing with respect to by-laws, property taxes or other financial obligations to the municipality, and must not be involved in ongoing litigation with the City.

Table 1 Final CIP Eligibility Criteria

2. Affordable Rental Thresholds

The affordable rental thresholds remain unchanged from the draft CIP. For the purpose of this CIP, the City defines affordable rental housing as those units rented at or below 125% of CMHC's average market rent (AMR) in Richmond Hill. The affordable rental threshold values will be updated annually. The CIP further breaks the affordable unit thresholds into three categories, which serves a range of households, as defined in Table 2 Affordable Rental Unit Thresholds below.

Definition	Methodology	Target Households	Maximum Threshold Value (2024)
Deeply Affordable Rental Unit*	Units at or below 80% of the average market rent (AMR) by bedroom type in Richmond Hill, as determined by CMHC	Low-income households	Bachelor: \$986 1 Bed: \$1,183 2 Bed: \$1,502 3 Bed: \$1,615
Affordable Rental Unit*	Units between 81% - 100% of the average market rent (AMR) by bedroom type in Richmond Hill, as determined by CMHC	Low- to moderate- income households	Bachelor: \$1,233 1 Bed: \$1,479 2 Bed: \$1,877 3 Bed: \$2,019
Moderate Affordable Rental Unit	Units between 101% - 125% of the average market rent (AMR) by bedroom type in Richmond Hill, as determined by CMHC	Moderate income households	Bachelor: \$1,541 1 Bed: \$1,849 2 Bed: \$2,346 3 Bed: \$2,524

Table 2 Affordable Rental Unit Thresholds

*Note: The definition and methodology for units at or below 100% AMR aligns with the "Affordable Residential Units for the Purposes of the *Development Charges Act, 1997 Bulletin*", as established and updated from time to time by the Province of Ontario.

3. Incentive Streams

In response to stakeholder feedback, the CIP's proposed incentive streams have been refined to provide clarity and certainty to CIP applicants, as well as to simplify the overall implementation process for applicants and staff. The four final CIP incentive streams are designed to offer financial support options that address both upfront capital and ongoing operational funding needs to ensure project viability, as detailed in Table 3 CIP For Affordable Housing and Sustainable Design Incentive Streams below.

Table 3 CIP For Affordable Housing and Sustainable Design Incentive Streams

CIP Incentives	Description	
Per Affordable Unit Grant (formerly Development Fees / Charge Grants)	 Offered to cover the per unit municipal charges and fees imposed on developments. Up to \$150,000 per affordable rental unit, reflective of the approximate cost of development fees and charges per unit. Applicants required to demonstrate project feasibility and financial need per unit to meet affordability thresholds. Applications evaluated based on criteria, with funding awarded to the highest ranked applications and within available budget. 	
Tax Increment Equivalent Grant (TIEG)	 Offered to cover the increase in property taxes as a result of new or redevelopment due to increased assessment value. Only available to applications with a minimum of 10 affordable rental housing units. TIEG proportionate to the percentage of affordable units within the residential portion of the development. 10-year TIEG for projects providing rents between 101% and 125% of average market rent, and 25-year TIEG for projects providing rents at or below 100% of the average market rent. Applications evaluated based on criteria, with funding awarded to the highest ranked applications and within available budget. 	
Competitive Capital Funding Grant	 Funds that may be offered to partially cover the capital costs of development, issued on a competitive basis through a Call for Applications and evaluated based on criteria. Funding may be awarded in addition to other grants. Additional eligibility criteria grant includes deeper affordability, increased amount of affordable rental units, and higher sustainability requirements. 	
Public Lands	 City-owned lands may be sold or leased at discounted costs in exchange for affordable housing. A separate Request for Proposal (RFP) process will determine the criteria and scoring for applicants. 	

The most notable change from the draft CIP is a restructuring of the incentive stream designed to offset costs associated with the development approval process. The final CIP includes the 'Per Affordable Unit Grant', formerly labelled the 'Development Fees/Charge Grants'. The intent and purpose of this grant remains the same, which is to sufficiently cover the costs associated with development fees and charges. The revised Per Affordable Unit Grant provides certainty for the developer as it allows for a one-time funding allocation to be identified at a set point in the project. It also allows for a more efficient administration process, ensuring best use of limited resources.

The final CIP includes a Per Affordable Unit Grant to be administered through an intake window, with applicants being evaluated based on set project evaluation criteria and ranked against one another. Based on evaluation criteria and budget limitations, not all eligible applicants are guaranteed funding and the City will have the discretion to decide which applicants should be funded.

4. Evaluation Criteria

Applications for the CIP incentives will be scored based on the following evaluation criteria:

- Number of affordable units
- Depth and duration of affordability
- Project maturity and approvals status
- Achievement of required Sustainable Metrics Program performance level threshold
- Support from other government funding programs
- Development and operational feasibility
- Qualifications of applicant

The evaluation criteria set out in the CIP document provides transparency in the City's decision-making process, while also providing flexibility for the City to exercise discretion in awarding grants based on the most appropriate projects. Priority evaluation criteria and scoring considerations for each CIP incentive intake will be reflected in the online CIP Guidelines, as appropriate.

Upon completion of CIP incentive intake and evaluation review processes, staff will bring forward a report to Council that outlines recommendations for awarding CIP funding.

CIP Implementation

Staff are prepared to implement the CIP for Affordable Housing and Sustainable Design in Q1 2025. The following administrative process improvements have been identified:

1. Phased Incentive Intakes

A phased approach will be undertaken to opening incentive streams for intake. In early 2025, the Per Affordable Unit Grant and TIEG streams will be the first incentives open for application intake. The pairing of these streams addresses feedback received throughout consultation that stakeholders face both upfront capital and ongoing operational financial pressures to deliver affordable housing. The evaluation scoring associated with this intake will be reflective of the need to prioritize projects that are the most shovel ready and partnered with other levels of government to mitigate risk to the City as outlined in the preceding sections.

The TIEG takes effect after building occupancy and MPAC reassessment and, as such, is not funded by HAF which must be spent by November 2027. The TIEG incentive involves refunding part of the City's portion of the property tax increase that results from new/redevelopment, proportional to the number of affordable rental units. This incentive is to be funded through the City's tax base. Applicants will be able to apply to one or both incentives (Per Affordable Unit Grant and TIEG) during a set intake window. This approach shall provide potential financial support streams for both upfront development costs and for ongoing operational costs, which were identified through the consultation process as obstacles to affordable rental housing delivery.

Staff have been actively working with the City's Development Planning Division to identify potential candidates for the CIP and are currently liaising with various local landowners and developers to discuss the potential affordable rental housing incentives that may be available through Richmond Hill's CIP should it be approved by Council. The current budget allocated to the CIP fund is approximately \$13M in HAF funding. This would amount to 80 to 90 total affordable rental units based on an estimate of \$150,000 per unit through the Per Affordable Unit Grant. As such, it is possible that the full \$13M of HAF funding may be allocated through the initial intake window for the Per Affordable Unit Grant stream. Accordingly, staff propose delaying the Competitive Capital Grant stream, when the City can better determine whether an intake for the Per Affordable Units Grant is appropriate (i.e. once the evaluation and allocation of the Per Affordable Units Grant intake is complete). At this time, the Competitive Capital Grant stream will be targeted to tentatively launch in late 2025 or early 2026, pending funding availability.

The public lands stream of the CIP will only be implemented if and when suitable Cityowned lands are available for affordable housing, for which a separate staff report would be brought to Council for consideration prior to any action being taken.

2. Promoting the CIP

The CIP program must be well communicated to all stakeholders as staff prepare to implement the program in Q1 2025. Through the development of this CIP project, staff have developed an extensive list of targeted stakeholders and local developers with whom staff will share information. The City will also be leveraging key stakeholder groups including the Building Industry and Land Development Association (BILD), Residential Construction Council of Ontario (RESCON), CMHC, York Region and others to share information about Richmond Hill's CIP through their communications channels. Staff will also utilize existing City communication tools and channels to promote the CIP across various sectors and reach a wider audience to increase the potential for uptake.

Climate Change Considerations

The CIP for Affordable Housing and Sustainable Design directly supports climate change mitigation and adaptation by creating incentives that encourage development to achieve higher levels of sustainability. The CIP will fund affordable rental housing

projects that will also achieve, at minimum, the Silver or Gold threshold in the City's Sustainability Metrics Program.

Financial Implications:

Funding for a CIP may come from three sources: the City's tax base, Community Benefits Charges or from other sources such as grants from other levels of government. The CIP does not have a permanent long term funding source.

In late 2023, the City of Richmond Hill was awarded \$31.1M from CMHC as part of the HAF, from which a portion will be allocated towards the CIP. As previously noted, the HAF is a one-time grant with a deadline for meeting housing target forecasts by November 2026, and a deadline for spending HAF funds by November 2027. If the CIP program is to continue beyond 2027, aside from a potential \$3M from Community Benefits Charges, the City will need to rely on other funding sources for the Per Affordable Unit Grant and Competitive Capital Grant Streams.

Staff have allocated up to \$13M of the HAF grant for the initial implementation of the CIP, to be administered through the Per Affordable Unit Grant and Competitive Capital Funding Grant. This amount may increase, depending on a number of factors including CIP uptake and the City meeting HAF agreement requirements. HAF grant funds are to be disbursed over four equal payments. The first three payments of the HAF grant are contingent on the City meeting project milestones; the fourth and final disbursement of the HAF grant is contingent on Richmond Hill meeting forecasted housing targets as demonstrated by the issuance of Building Permits by November 2026. As such, the final HAF grant disbursement (~\$7.8M) is not being allocated until such time the City can be certain this final payment will be received. Administration costs associated with implementation of the CIP are also to be funded by the HAF grant, as outlined in the 2025 Budget Book.

Since the TIEG incentive stream is not funded by HAF, this incentive may continue to be offered beyond the HAF spending deadline. The TIEG takes effect after a building has been occupied and the property value is reassessed. Unlike the Per Affordable Unit Grant and Competitive Capital Grant Streams, the TIEG is administered on an annual basis after a building is occupied. This incentive will refund part of the increase in the City's portion of property tax resulting from new or redevelopment. Consequently, the TIEG will be awarded annually as a repayment of some of the property taxes paid by the applicant over 10 to 25 years, depending on the depth of affordability of the development project.

Funding for the TIEG will be sourced from the City's future tax base and it does not rely on the HAF. As the TIEG seeks to refund a portion of property taxes collected over a predetermined period of years, the TIEG does have future tax base impacts. Staff assessed the impact of a 25-year TIEG for 100 affordable housing units and it amounts to about \$1.58 per the average residential property owner.

Relationship to Strategic Plan 2024-2027:

The recommendations of this report align with the City's Strategic Plan Pillar 1 Growing a Livable, Sustainable Community, specifically, Priority 1 and 2, by establishing financial tools and a program that incentivizes a range of housing options and affordability as well as encouraging higher levels of sustainable design. The CIP for Affordable Housing and Sustainable Design supports core priorities within the Strategic Plan as well as other efforts the City is undertaking to increase the provision of affordable housing and sustainable forms of development that contribute to the overall socio-economic and environmental health of the community.

Attachments:

The following attached documents may include scanned images of appendixes, maps and photographs. All attachments have been reviewed and made accessible. If you require an alternative format please call the contact person listed in this document.

- Appendix "A" Draft By-law #133-24 Designate a Community Improvement Project Area for the City of Richmond Hill
- Appendix "B" Draft By-law #134-24 Adopt a new CIP (File #CIP-24-0001)

Report Approval Details

Document Title:	SRPBS.24.103 Request for Approval – Community Improvement Plan for Affordable Housing and Sustainable Design.docx
Attachments:	 SRPBS.24.103 - Appendix A - By-law 133-24 to Designate CIP Area.docx SRPBS.24.103 - Appendix B - By-law 134-24 - CIP for Affordable Housing and Sustainable Design.docx
Final Approval Date:	Oct 29, 2024

This report and all of its attachments were approved and signed as outlined below:

Maria Flores - Oct 29, 2024 - 11:15 AM

Gigi Li - Oct 29, 2024 - 11:42 AM

Gus Galanis - Oct 29, 2024 - 11:43 AM

Darlene Joslin - Oct 29, 2024 - 1:13 PM