



**Community Development Authority
Meeting Agenda
Wednesday, October 27, 2021 at 10:00 a.m.
via teleconference**

Join Zoom Meeting: <https://us06web.zoom.us/j/85228580620>

You may also join the meeting via toll free phone number: 1-312-626-6799

Meeting ID: 852 2858 0620

1. Call to order.
2. Consider August 10, 2021 meeting minutes.
3. Presentation – [Shorewood Housing Market and Needs Analysis](#) 2020
Presenter – Julia Smith, Novogradac
4. Consider hosting Shorewood Speaks on Affordable Housing with the HRC as the next session in: [The Role of Suburbs in Creating a Diverse and Inclusive Region: Spotlight on Housing](#).
5. CDA Q3 financial report.
6. Adjournment.

DATED at Shorewood, Wisconsin, this 21st of October 2021 at 4:00 p.m.

VILLAGE OF SHOREWOOD
Rebecca Ewald, Village Manager

Should you have any questions or comments regarding any items on this agenda, please contact the Village Manager's Office at 847-2701. It is possible that members of and possibly a quorum of members of other governmental bodies of the municipality may attend the above stated meeting to gather information; no action will be taken by any governmental body at the above stated meeting other than the governmental body specifically referred to above in this notice. Upon reasonable notice, efforts will be made to accommodate the needs of all individuals



Community Development Authority
Meeting Minutes
Friday, August 10, 2021 at 9:00 a.m.
via Tele/Video-Conference

Present: Chair Peter Hammond, Jessica Carpenter, Jon Krouse and Tr. Stokebrand

Also present: President Ann McKaig, Teig Whaley-Smith, Gina Stilp; Village Manager Rebecca Ewald; and Planning & Development Director Bart Griepentrog

1. Call to order.

The meeting was called to order at 9:05 am.

2. Consider July 9, 2021 meeting minutes.

Tr. Stokebrand motioned to approve the minutes as drafted; seconded by Ms. Carpenter. Vote 4-0.

3. Presentation – Affordable Housing, Co-presented by Gina Stilp, Executive Director - Zilber Family Foundation and the Chair - Community Development Alliance and Teig Whaley-Smith, Project Manager, for the Collective Affordable Housing Plan led by CDA and its partners.

Village Manager Ewald introduced Gina Stilp and Teig Whaley-Smith.

Ms. Stilp noted that the Community Development Alliance was happy to hear that Shorewood extended TID 1 for the purposes of affordable housing. She stated that the Community Development Alliance was interested in the opportunity to spread its efforts beyond the city of Milwaukee with its suburban partners. She noted that Community Development Alliance was interested in creating a quality affordable home for every Milwaukeean. She noted that the Community Development Alliance was an affiliate group of funders and housing and community economic development implementers.

Mr. Whaley-Smith provided an overview of the Government Alliance on Race and Equity's (GARE) Racial Equity Policy Process. He noted that the Community Development Alliance started their process in February 2021 and was currently at the Development Strategies phase. He pointed out that the Community Development Alliance was focused on serving households in the city of Milwaukee making between \$7.25/hour (\$16,763 annually) and \$32/hour (\$67,050 annually).

Chair Hammond questioned if the Community Development Alliance had considered starting with a smaller geographic scope and identifying proof of concepts. Mr. Whaley-Smith noted that the affordable housing industry was quite mature and proof of concepts, such as low-income housing tax credits and habitat for humanity for example, were well known. He noted that current strategies needed to work on focus and scale to make sure all populations were served in the numbers required to make an impact. He reminded the group that the Community Development Alliance's goal (its "why") was to provide quality affordable housing for every Milwaukeean, but he noted that Shorewood's "why" may be different. He noted that unlike Milwaukee, Shorewood does not have large scale areas available for redevelopment, but that it did have a strong real estate market that could grow vertically.

Tr. Stokebrand questioned how the Community Development Alliance was making choices between rental and homeownership options. Mr. Whaley-Smith responded that it was important to start with the data. He noted that the homeownership rate of Black (27.4%) and Latino (39.5%) households was significantly less than that of White households (68.5%) and that they were also trending in different

directions, up 7% for White households and down 7% for Black households since 1970. He stated that the Milwaukee would need to produce an additional 32,000 Black and Latino households to achieve equity, or 42,000 within the metro area.

Tr. Stokebrand questioned what options were available if Shorewood was not interested in developing vertically. Mr. Whaley-Smith noted this question was operational and suggested that Shorewood first focus on answering why it was interested in pursuing racial equity work not how to do it.

Mr. Whaley-Smith provided an overview of the rental housing market in the city of Milwaukee. He noted that the city has the right number of units, but they are at the wrong price point for many households. He showed data that pointed out that an additional 32,000 housing units were needed for families making between \$7.25-\$15.00/hour. Mr. Whaley-Smith noted that the data relied on the standard calculation that a household should not spend more than 30% of its income on housing. As a result, he said that families may be forgoing other needs or doubling-up their households.

Based on the data, he stated that the Community Development Alliance identified four strategic areas to focus on. In order to lesson the Black and Latino homeowner gap, an offensive strategy to produce, promote and purchase homes was needed alongside a defensive strategy to preserve and prevent displacement. He noted similar strategies were needed to align the rental market by producing or converting higher income units for households making \$7.25-\$15.00/hour, and preserving existing housing in those markets and preventing displacement and evictions.

Mr. Whaley-Smith discussed the operational tactics that have been selected by the Community Development Alliance to address its strategic areas of focus. He noted a belief that investors are beating homeowners to the market in certain areas and are making large portfolio purchases without contingencies, which mitigates individual risk. The creation of an acquisition fund was developed as an operational strategy to compete with those forces and slow down the market. He also noted that alternative homeownership and physical structures need to be developed, along with alternative forms of lending. He stated these strategies will take decades to implement.

Mr. Whaley-Smith reiterated that Shorewood first needed to understand why it was interested in pursuing equity efforts. He noted that the GARE process starts with normalizing the conversation with shared analysis, definitions and priorities. Then organizing internal infrastructure and partnerships is recommended, followed by operationalizing tools and data to drive strategies. He noted that this process was similar to the “start with why” process of tackling big goals. Why are we doing this, followed by how can we act and then what should we do.

Mr. Whaley-Smith provided the following example questions that Shorewood may wish to answer to help understand why equity work should be considered alongside its affordable housing efforts:

- A quality affordable home for everyone already living in Shorewood?
- A quality affordable home for everyone working in Shorewood?
- A quality affordable home so our kids can and want to live near us?
- Racial equity in homeownership rates in Shorewood?
- Racial equity in population in Shorewood?
- A quality affordable home for every Milwaukeean?

Ms. Carpenter stated that suggesting Shorewood first answer its “why” hit the nail on the head for her. She was not sure we had that answered yet. She also noted that property taxes often come up as an important issue with respect to affordability in Shorewood. Mr. Whaley-Smith noted that adjusting tax rates for particular households is not allowed in Wisconsin under its Uniformity Clause, but stated that anti-displacement funds have been set up to help low-income homeowners as their property taxes rise. Mr. Whaley-Smith also suggested that Shorewood may have different “whys” for affordability and racial equity.

Chair Hammond stated that Shorewood could pursue its own path in identifying its “whys,” but acknowledged that Shorewood is also part of the larger ecosystem. He questioned if the Community Development Alliance had considered partnerships with communities where it provided higher level strategic guidance in helping to assure that the overall approach is consistent and additive. Mr. Whaley-Smith stated that was a critical question for the entire region, do we stay in our own silos or work together. He noted that if Shorewood had the same “why” as the Community Development Alliance that it would be easy to add itself to the table as a partner. Shorewood would then just need to understand what role it would play in the larger picture. He suggested that Shorewood may be ahead of the game in some sense in that its school district has been open to students of color from outside of the community. He noted that developing strategies to assist those families to live in Shorewood would not be disruptive in the sense that the families are already part of the community.

Mr. Whaley-Smith discussed the difficulties of focusing equity programs on racial groups. He provided the example of disadvantaged business designations, which has been done for decades and withstood challenges. He noted that same principle is also starting to be applied to housing programs, including targets to Black and Latino homeowners, as well as other potential groups. He noted that a race neutral strategy would be to target families with students in the Shorewood School District.

Chair Hammond questioned if there were any examples of how communities came to consensus on their “whys”. Mr. Whaley-Smith stated that he’s seen it happen in two ways. The first was strong leadership, which was exemplified in Milwaukee County through their declaration of racism as a public health crisis. The second involved broad-based community planning processes. He noted that the geographic scope of what “community” meant in that planning process would likely present difficulties. He stated an understanding that people move to Shorewood because they like the way it is but suggested that may change for future generations. He believed that understanding whether Shorewood saw itself as part of the region or as its own neighborhood would be necessary to drive its strategies moving forward.

Tr. Stokebrand noted that Shorewood was not a city, but rather a village with limited resources. She questioned how Shorewood could break out of its silo into more metro-wide thinking, yet remain Shorewood. Ms. Stilp noted that the Community Development Alliance is still working through its own implementation and that there is room at the table for more partners, but ultimately it would be Shorewood’s decision as to how to move forward. Chair Hammond noted that moving forward will require an understanding of both perspectives: Shorewood’s larger role in the ecosystem as well as its individual issues. He expressed appreciation for being invited to consider participation in the Community Development Alliance’s process.

Chair Hammond noted that Shorewood strives to be an inclusive community. He stated that Shorewood as a community will benefit from increased diversity. He noted that diverse companies deliver better results to their investors and clients, and he believed the same would be true in a community. He stated that we need to live together to break down barriers and everyone wins in that process. He believed that understanding the “why” with that perspective is a good place to start. Mr. Whaley-Smith agreed and stated that a next level question in the process would be to know if the goal is that people of color feel welcomed in Shorewood, actually live in Shorewood and actually feel like they belong in Shorewood.

India McCause commented that she appreciated the conversation and questioned if there was an example of a community somewhat like Shorewood that has taken incremental steps towards a “why.” She also questioned how the Village could keep true to its mission to advance affordable housing as it did with its decision to extend TID 1 while proposals for luxury housing continue to be received. Mr. Whaley-Smith was unaware of a similar suburb that has gone down this process, but did mention Brown Deer as a community that has successfully brought in Black and Latino homeowners and serves people who earn \$7.25-\$15.00/hour. He also noted from a physical development perspective that

Brown Deer is very different than Shorewood. He stated that if Shorewood prioritized maintaining its density and geographic character as its “why” that operational solutions towards racial equity would be limited and expensive. He provided an example of a \$300,000 home requiring a \$150,000 subsidy to make it affordable to a household earning \$60,000. Whereas, he noted that a more dense development with more modern, smaller units could require a subsidy of only \$40,000 per unit for that same household.

Mr. Whaley-Smith referenced The Color of Law as a worthy resource to explain the history of housing policy and its past mistakes, including red-lining. He noted that exclusionary zoning, which is race neutral, but prohibits the development of smaller units, may be seen as today’s version of red-lining in 40-60 years.

Mr. Whaley-Smith stated that if Shorewood chose to go on a racial equity journey and begins to normalize the conversation that discussing the priorities between racial equity and current density could involve a major conversation. He noted that not everyone may agree and tough votes may need to be taken. He reiterated that the Community Development Alliance is available to help Shorewood on its journey.

Ms. Stilp noted that the Community Development Alliance hired the Wisconsin Policy Forum (WPF) to do research for them which identified peer cities for Milwaukee. She suggested that the WPF may be able to do a follow-up from their “Laying the Foundation” report to look at suburban communities as additive research. Ms. Carpenter noted that additional research of similarly sized, inner-ring suburbs would be helpful. Tr. Stokebrand questioned if some of the TID extension money could be used to fund research. Village Manager Ewald noted that she had reached out to the WPF about two months ago to ask if they would have interest in doing a study on how the suburbs around Milwaukee could leverage their TIF extension money. She also stated that it would be critical to identify communities with characteristics similar to Shorewood that have high real estate costs and do not have available land to develop. Chair Hammond also noted that other funds were available. Tr. Stokebrand reiterated her prior concern that the extension money be spent on actual assistance, not administration.

Mr. Whaley-Smith noted that developing affordable housing or racial equity programs will be an incremental journey that could be decades long in the making. He encourages all communities to look at the occupations that people think favorably about and keep the economy going, such as an entry level teacher or health-care professional, and do the calculation if they can live in the community. If they can’t, what strategies should be developed to allow them to live there or understand what is needed to accommodate them. Tr. Stokebrand noted that a lot of our police, fire fighters and teachers do not live in Shorewood because the houses are too expensive, and the taxes are too high.

Sue Bronson appreciated the focus on equity and stated that it was very important but noted that there are also people who have lived in Shorewood for a long time and would like to remain, such as fixed-income older residents. Chair Hammond noted that was a great point and stated that affordable housing means slightly different things to different groups. He pointed out the three groups that have been mostly discussed in these conversations focused on racial equity, aging in place and communities with special needs.

Chair Hammond summarized that today’s presentation should help the CDA to start asking the next level questions necessary to move forward. Ms. Carpenter noted that she would like to see a workshop with residents or listening session be part of the next steps.

Davida Amenta appreciated Mr. Whaley-Smith’s presentation and how he connected belonging and policing and noted that focusing only on one area is not the most holistic approach. She believed that the community generally agrees that it wants equity and diversity and to be a better partner to the city of Milwaukee. She noted that we do need more definition on why and who, but operationalizing will

involve another whole set of questions that should be thought of across issues and functions, not by the CDA alone with housing.

4. CDA Q2 Financial Report.

Village Manager Ewald stated that the Q2 financial report was provided for reference.

5. Update on project page for educational series: The Role of Suburbs in Creating a Diverse and Inclusive Region: Spotlight on Housing.

Village Manager noted that a landing page for all for all of the information on the topic of affordable housing has been assembled. She stated that Mr. Whaley-Smith's presentation would be added. She also noted that if anyone had additional resources or information to add, that they should contact her.

**6. Next meeting: Tuesday, September 14, 2021 – 6:30 p.m. via zoom
Presentation: Affordable Housing 101: What You Need To Know About Affordable Housing
***Registration required via the program link above.**

Opportunities and Challenge

Presenters: Reggie Jackson, Nurturing Diversity Partners

Village Manager Ewald reminded the CDA that the next session to continue the conversation of affordable housing will take place on September 14th in partnership with Nurturing Diversity Partners, the Senior Resource Center and the Shorewood Library, and that pre-registration is required.

Village Manager Ewald also noted that a presentation from Novogradac to re-summarize the findings of the recent Housing Market Study and Needs Analysis is being arranged for a future meeting.

7. Adjournment.

The meeting adjourned at 10:23 am due to loss of quorum.

Respectfully submitted,



Bart Griepentrog, AICP
Planning & Development Director



VILLAGE OF SHOREWOOD

REPORTS AND PRESENTATIONS TO THE CDA

Agenda Item: Presentation – [Shorewood Housing Market and Needs Analysis 2020](#)

Presenter – Julia Smith, Novogradac

Date: October 27, 2021

Presenter: Rebecca Ewald, Village Manager

Department: Village Manager's Office

History – *Please include a timeline of historical relevant events related to this agenda item. This may include previous Village Board action, policies, planning documents, etc. If able, hyperlink to previous agenda packets (include page number) to reference information. If there is no relevant history, N/A should be entered in this space.*

As a part of the CDA's education series, [The Roles of Suburbs in Creating a Diverse and Inclusive Region: Spotlight on Housing](#) the CDA requested the author of the recently completed [2020 Shorewood Housing Market and Needs Analysis](#) come back before the CDA and provide an presentation on the report, with a focus on the data, information and recommendations that relate to affordable housing.

Agenda Item Discussion – *Please provide a summary of the agenda item along with bullet points highlighting the main items and key issues to be discussed.*

Julia Smith, Novogradac, and author of the report will be joining us virtually to provide the presentation.

Community and Business Outreach – *If applicable, did you notify the community groups and businesses that are directly impacted by this agenda item. Please specify in attached communication plan how community groups and businesses will be informed of action after Village Board consideration.*

Yes No

If Yes, identify how and what community groups and businesses were notified.

Action Required / Recommended – *Please include the recommended motion or possible actions for this agenda item.*

No action required.

Attachments – *Please list the following attachments and supporting documents for this agenda item. Some attachments may be hyperlinked. Include Fiscal notes, if applicable, as the first attachment following this memorandum. Attachments may include: agreements/contracts, presentation materials, letters, service proposals, etc.*



VILLAGE OF SHOREWOOD

REPORTS AND PRESENTATIONS TO CDA

Agenda Item: Consider hosting Shorewood Speaks on Affordable Housing with the HRC.

Date: October 27, 2021

Presenter: Rebecca Ewald, Village Manager

Department: Village Manager's Office

Agenda Item Discussion – *Please provide a summary of the agenda item along with bullet points highlighting the main items and key issues to be discussed.*

At the meeting, it was announced there would be a Shorewood Speaks on affordable housing for the third week of November via Zoom. Commission members asked for help to seek guest speakers and suggestions on the format. Village staff has been working on developing a proposal for both the Human Relations Commission and the Community Development Authority (CDA) to review. Since affordable housing is a topic that impacts both volunteer committees, it is recommended by staff for the committees to co-host the next Shorewood Speaks event. Below are details for the November 2021 Shorewood Speaks:

Hosting

The HRC and CDA would assign one representative to co-host the Shorewood Speaks event. This would entail kicking off the event with a summary and purpose of the Shorewood Speaks, introducing the guest speakers and facilitator, summarizing the speaking guidelines for the event, and thanking community members for attending. The hosts would also close the event by including next steps and thanking everyone, once again, for attending. Each committee shall assign a representative during their October meeting for the November event.

Speakers

Village staff is recommending Kori Schneider Peragine (Metropolitan Milwaukee Fair Housing Council), Matthew Melendes (Milwaukee LISC), and Joaquin Altoro (Wisconsin Housing and Economic Development Authority) to be the guest speakers and presenters for the event. After the hosts provide an introduction, the speakers will be asked to give a 10-15 minute presentation to provide some general context on affordable housing. Once the presentations are done, speakers will remain available to answer specific questions or comments that may come up during the community discussion. During the presentation, the speakers will share experiences which will address the following concepts:

- What are some of the reasons a community may elect to do affordable housing?
- What does an affordable housing project look like?
- What is a municipality's role (and other stakeholders' roles) in an affordable housing project?
- How does someone qualify and apply to live in an affordable housing unit?
- What other programs and tax credits exist to assist affordable housing developments and users?
- What factors does a developer consider when working on an affordable housing project?
- Why would a community not elect or shy away from affordable housing projects?
- How common are affordable housing projects in suburban communities?
- What resources are available to learn more about affordable housing?

Facilitator

Once the presentations are complete, the event will have a community discussion on the topic of affordable housing. Staff proposes the main role of CDA, HRC, and other Village officials and staff is to listen to the discussion while taking notes. As a result, Village staff proposes having a separate

facilitator to moderate the community conversation, Frank Cumberbatch – Bader Foundation. The facilitator would enforce the conversation guidelines reported at the beginning of the event by the hosts. The facilitator would also announce questions and direct topics between the community, the speakers, and any staff or officials when necessary. The facilitator assures the discussion stays on topic and the event ends at an appropriate time. It is recommended for the entire event to last two hours (6:00 – 8:00 p.m.).

Format of the Community Discussion

It is proposed for the community discussion to last 75 minutes. This would allow time for 3-5 topics to be covered. The facilitator would read off content produced by Village staff to introduce the question and the community members/participants would then have the ability to respond. Participants wishing to speak would raise their virtual hand and called individually by the facilitator. Specific topics are yet to be determined. The virtual meeting would be recorded and shared through the Village's communication channels.

What needs to be resolved by the HRC and CDA during their October meetings?

- Does this format and proposal meet the expectations and wishes of the HRC/CDA?
- Are there any specific topics the HRC/CDA wishes to be covered? Think about what potential policy decisions may be upcoming that your committee would appreciate to receive community feedback.
- What general rules or discussion guidelines would you want for the event?
- Which person from your committee would you like to serve as a co-host for the event?
- How will committee members help promote this event to community members?

Finalized Shorewood Speaks Event

Village staff anticipates all details related to the event will be finalized by the first week of November so that there will be at least two weeks to promote the event to the public.

Human Relations Committee Feedback

On October 14, 2021 the HRC met to discuss the same information included within this memo. An excerpt from their meeting minutes is below. The CDA is requested to confirm if they agree with the suggestions provided.

“Mr. Burkart summarized the memo included in the Commission packet. He expressed the desire for the Commission to respond to a number of questions to help coordinate for the next Shorewood Speaks event. The Commission expressed support for this approach for the event. For potential topics to inquire about, one suggestion was to ask about baseline data about urban development and parking. It was expressed for a desire to hear from dissenting opinions and acknowledge those perspectives. The Commission supported time limits for community members and set it to 3 minutes. There was also a suggestion for advertising of the event to include the virtual meeting rules. When it came to the chat feature, the Commission feels it could be distracting and take away from the discussion. People should only make “I” statements when talking. Community members can submit questions or comments through a staff member to be read during the forum as long as they have their name with the remark. No offensive or derogatory language shall be used. The CDA or HRC reserves the right to remove someone from the

call if they aren't meeting the guidelines. Ms. Van Hoorn and Mr. Weiss will check their schedules to see if they can serve as a co-host. If not available, Ms. Parker will serve as a co-host. The Commission discussed different ways to promote and market the event. Ms. Berry offered the suggestion to put the event on the electronic board outside of the high school. The members shared different groups and organizations in the area who also may have interest in attending."

Community Development Authority - 3Q 2021 Financial Report

Account Number	Account Name	2018 Actual	2019 Actual	2020 Actual	YTD 9/30/21	Benchmark Budget	Notes
Revenues							
700-6800-48100	Interest Income	-	7,400	4,206	258	\$ 5,000	
700-6800-48110	Loan Interest Income	7,319	6,703	1,600	1,380	\$ 5,000	Business Loans
700-6800-48900	Miscellaneous Revenues	-	-	-	-	-	
Total Revenue		<u>7,319</u>	<u>14,103</u>	<u>5,806</u>	<u>1,638</u>	<u>10,000</u>	
Expenditures							
700-6800-52100	Program Administration Fees	7,700	7,700	7,700	7,700	\$ 7,700	Village Staff / Façade Admin
700-6800-52120	Professional Fees - Legal	-	-	-	-	2,000	
700-6800-52130	Professional Fees - Financial	7,531	130	140	-	5,000	Audit / Annual CDA report
700-6800-52920	Assessment & Planning	-	30,000	35,000	5,000	5,000	Trans. 2019, Housing 2020, TIF Policy 2021
700-6800-53120	Copy & Printing Costs	-	-	-	-	1,000	
700-6800-53130	Postage & supplies	-	-	-	-	1,000	
700-6800-53140	Communications / Education	5,909	3,055	4,000	4,000	5,000	SWTDY contributions
700-6800-54620	Loan Program costs	240	545	384	-	3,000	Inactive
700-6800-54630	Façade Program	5,935	59,428	39,271	-	-	closed in 2020
700-6800-54640	EBAP Grants	-	-	300,635	-	-	closed in 2020
700-6800-54650	Business Recruitment	3,260	2,065	-	-	8,000	BID activities ??
700-6800-54660	Developer Recruitment	585	195	-	-	2,000	BID activities ??
Total Expenditures		<u>31,160</u>	<u>103,118</u>	<u>387,130</u>	<u>16,700</u>	<u>39,700</u>	
Net Change in Fund Balance		(23,841)	(89,015)	(381,324)	(15,062)	(29,700)	
Beginning Fund Balance		1,222,436	1,198,536	1,109,521	728,197	1,109,521	
Restricted for Façade Program		309,327	249,899	-	-		
Restricted for Loan Program		623,736	629,894	631,110	632,490		
Restricted for other CDA activities		<u>265,532</u>	<u>229,728</u>	<u>97,087</u>	<u>80,645</u>		
Ending Fund Balance		<u>\$ 1,198,536</u>	<u>\$ 1,109,521</u>	<u>\$ 728,197</u>	<u>\$ 713,135</u>	<u>\$ -</u>	

Business Loan outstanding balances	241,747	\$ 107,779	\$ 94,931	\$ -
Available Business Loan funds	\$ 381,989	\$ 522,115	\$ 536,179	\$ 632,490

Village of Shorewood CDA

9/30/2021

BUSINESS LOAN SUMMARY

<u>Borrower</u>	<u>Amount Loaned</u>	<u>Closing Date</u>	<u>Final Pay Due</u>	<u>2021 Beginning Balance</u>	<u>2021 payments</u>	<u>Ending Balance</u>	
Kensington Liquor (Keith Marquardt)	24,195	3/20/2013	4/1/2020	8,296	8,296	-	paid 10/4/21
Northwoods (Patrick Bieser)	179,779	7/1/2014	8/1/2023	86,635	86,635	-	Paid 7/9/21
Total				94,931	94,931	-	