



**CITY OF SALINAS
COUNCIL STAFF REPORT**

DATE: MARCH 19, 2018
DEPARTMENT: COMMUNITY DEVELOPMENT
FROM: MEGAN HUNTER, DIRECTOR
TITLE: ADMINISTRATIVE REPORT ON ACTIVITIES TO ADDRESS HOMELESSNESS

RECOMMENDED MOTION:

No action is required. This item is an Administrative Report on the City's activities to address homelessness.

RECOMMENDATION:

Staff recommends the City Council receive and accept the Administrative Report, which provides an update on the City's implementation of multiple actions to address homelessness in Salinas and Monterey and San Benito Counties.

EXECUTIVE SUMMARY:

In the City of Salinas, the City Council has shown strong leadership by taking on an active role in advocating for implementation of best practices to end homelessness throughout the region. City funding has been directed to programs known to work such as street outreach, emergency shelter, homeless prevention, housing navigation, and rapid rehousing. In addition, City Council has approved millions in funding for affordable housing projects such as Moon Gate Plaza (88 affordable units of permanent supportive housing) and Hikari (49 affordable units of family housing). When the Salinas/Monterey and San Benito Counties Continuum of Care (CoC) Emergency Solutions Grant (State ESG) allocation administered through the California Housing and Community Development (HCD) was almost lost, City Council authorized staff to administer the grant program for San Benito and Monterey Counties. The City is the only Administrative Entity (AE) in the State administering State ESG funds. This has resulted in nearly \$1.2 million of additional funding for homelessness services in San Benito and Monterey Counties over the last two years.

Over the past year, the City has stepped up even more to address homelessness. On October 9, 2018, City Council authorized the City Manager to enter into a Memorandum of Understanding (MOU) with the County of Monterey (County) regarding the: 1) development and operation of a new homeless shelter at 855 East Laurel Drive, 2) development of permanent supportive housing at 1220 Natividad Road, and 3) continued operations of a temporary warming shelter at 111 West Alisal Street. Under the direction of Chief Frese, the Police Department appointed a new Homeless Outreach Team (Hot) Officer who is actively working with homeless in Chinatown. Public Works

continues its diligent cleanup of encampment areas overrun with trash and other sanitation challenges in an effort to protect our waterways and ensure the safety of residents from diseases like Hepatitis A. In addition to these activities, multiple departments and divisions are allocating time and resources to coordinate efforts and funding to address homelessness. Whether it is the Fire Department extinguishing fires in encampments or the Library and Community Services Department hosting a homeless case manager at John Steinbeck, the City is actively coordinating our services across departments, meeting monthly to do so.

As we continue these efforts, staff has begun to discuss ways to accurately calculate our expenditures. Unfortunately, this is difficult to accomplish because many of our homeless services are integrated within larger departmental budgets. In 2017-2018, it is estimated that the City spent nearly \$3 million on homeless services and housing. Of this amount, approximately \$2.75 million came through grant funding. In 2018/2019, it is estimated that the City's direct General Fund allocation on homeless activities is nearly \$835,000. These expenditures do not account for the hundreds of hours of staff time allocated to addressing homelessness.

BACKGROUND:

As noted in the 2015-2023 Housing Element, Salinas's residents are facing increasing challenges affording housing. The Housing Element identified that 77% of Salinas households are experiencing significant cost burdens, defined as gross housing costs exceeding 30% of gross household income. These conditions have only grown worse, as lack of units helped push up rents between 2015 and 2016 by almost 20%. As a result, the Salinas metro area ranks in the top 10 least affordable in the United States, according to an analysis of 2016 census data by Harvard's Joint Center for Housing Studies. The housing crisis in Salinas is also evident by the steep increase in the number of homeless. The 2017 Monterey County Homeless Census (Point In Time Count) identified that Salinas had 1,361 residents experiencing homelessness, a 57% increase from 2015. As a result, Salinas represented approximately 56% of all homeless residents in the County.

The City of Salinas has taken its role in addressing homelessness very seriously and as a result, hired Urban Initiatives (UI) in 2016, a non-profit based out of Pasadena. UI has assisted the City in formalizing a strategy based upon the best practices for ending homelessness and has helped us direct funding to have the greatest impact with limited resources.

DISCUSSION:

Services

The City is able to support direct homeless services through federal and state grants. As an entitlement jurisdiction, the City receives funding from the United States Department of Housing and Urban Development (HUD) specifically for Salinas including: 1) Community Development Block Grant (CDBG), 2) HOME Investment Partnerships Program (HOME) and 3) Emergency Solutions Grant (ESG). In fiscal year 2017/2018, the City received a HUD entitlement grant allocation in the amount of \$2,780,843 and \$293,775 in program income. In addition to our federal grant, the City received \$565,704 in State ESG for services in Monterey and San Benito Counties. On January 11, 2019, the City also received notification of a \$1,027,285 award from HCD for the California Emergency Solutions and Housing (CESH) Grant Program.

CDBG (FY 17/18) - \$550,000

The City provided \$50,000 to the Franciscan Workers of Junipero Serra for operation of the Chinatown Health Service Center, which served 675 unduplicated clients. The City also leased the facility for this program. The City allocated \$500,000 to the First United Methodist Church to fund improvements to the church's kitchen facility to assist with their ongoing work to feed, clothe, and provide day shelter to low-income and homeless residents six days a week. The church provides up to 200 meals daily. While many of those utilizing these services are homeless, the church plays an important role in providing food support to low-income families. The project was initially delayed due to potential litigation.

Federal ESG (FY 17/18) - \$447,820

The ESG program utilizes federal funds to support communities in providing street outreach, emergency shelter, rental assistance, and related services. This program provides resources for adults and families with children experiencing or at-risk of homelessness. The City allocated the full amount \$447,820, but \$385,614 was expended during the FY 17/18 year.

FY 2017-18 ESG Public Services			
Agency	Program Name	Unduplicated Clients Served	Budget
Central Coast Center for Independent Living	RRH Housing Assistance Program	48	\$33,482
Community Homeless Solutions	Temporary Warming Shelter	337	\$254,043
Franciscan Workers of Junipero Serra	Dorothy's Drop-In Center	1,174	\$46,985
Interim, Inc.	MCHOME	28	\$79,724
Interim, Inc.	Site-Specific Homeless Outreach Carry-over funding	6	\$14,946
City of Salinas	Program Administration	0	\$33,586
	Total	1,587	\$447,820

State HCD ESG (FY 17/18) - \$565,704

In addition to entitlement ESG received directly from HUD, the City received a Continuum of Care (COC), ESG allocation from California Housing and Community Development (State HCD) for San Benito and Monterey Counties. This program began in April 2018 due to State program delays and resulted in expenditures of only \$134,579 in FY 17/18, representing only two months.

FY 2017-18 State HCD ESG Public Services			
Agency	Program Name	Unduplicated Clients Served	Budget
Central Coast Center for Independent Living	RRH Housing Assistance Program	42	\$186,000
Community Human Services	Safe Place Emergency Shelter	74	\$55,000
County of San Benito	San Benito Shelter and Rapid Rehousing Program	89	\$190,801
Interim, Inc.	Site-Specific Homeless Outreach	24	\$113,912
City of Salinas	Program Administration	0	\$19,991
	Total	229	\$565,704

Warming Shelter - \$254,043 (FY 17/18)

Over the last four years, the City has spent \$429,870 to fund the Warming Shelter (Shelter) typically in partnership with the County. In FY 17/18, the City provided \$254,043 in funding to Community Homeless Solutions to support shelter operations including housing navigation, rapid rehousing, and case management. This year (FY 18/19), the City budgeted \$22,442 from federal ESG, and \$174,264 from State ESG to fund the Shelter through May 2019. The Shelter has been consistently serving 70-80 persons, including men, women, and families with children, daily. Because of the delay in receiving authorization to expend the State ESG funding, the City has allocated an additional \$89,573 in General Fund (\$24,573 CDD Budget, \$65,000 Mid-year) to ensure continuous operations.

California Emergency Solutions and Housing (CESH) Grant Program - \$1,027,285

Funding will be distributed between Salinas/Monterey (\$877,285) and San Benito (\$150,000) Counties based on percentage of homeless. The City of Salinas will utilize the full 5 percent administrative allocation totaling \$51,364 for the two-year grant.

Funding within Monterey County is proposed to be used within the City's Chinatown and Downtown areas as a pilot program to attempt to reach functional zero in homelessness in a focused area. The Chinatown and Downtown Project will include heavy street outreach and utilize funding for housing subsidies to accomplish the core goal of ending homelessness.

2018 Award CESH Program – Proposed Funded Activities	
Rental Assistance, Housing Relocation and Stabilization Services	\$267,503
Flexible Housing Subsidy Funds	\$267,504
Operating Support for Emergency Housing Interventions	\$390,914
Project Administration Costs	\$51,364
Development of a Plan Addressing Actions Within Service Area	\$50,000
Total	\$1,027,285

Public Safety

As homelessness has increased, more individuals and families have become unsheltered, living in vehicles, tents, and sleeping bags. Salinas is also experiencing growth in the number of encampments, which have spread throughout the City, particularly within parks. Homeless encampments are no longer solely concentrated in Chinatown. As a result, both neighborhood residents and business owners are expressing greater concern about public safety challenges. Consequently, beginning last Fall, City departments began meeting monthly to coordinate services and to determine how best to address public safety around homelessness.

Police & the Homeless Outreach Team (HOT) Officer

The Salinas Police Department (SPD) has been researching various best practices on how police have effectively addressed homelessness. Inspired by both national programs in places like Florida and the work in the City of Monterey, Chief Frese created a position for a HOT Officer, selecting Officer Gabriel Carvey to serve in the position. The HOT Officer is currently working in Chinatown and is focused on building trust with the homeless and fostering a culture change to better maintain encampment areas. SPD continues to provide support to Public Works, Code Enforcement, and Library and Community Services to address encampments. SPD has been especially focused on addressing challenges in Chinatown and more recently within Sherwood Park.

Public Works and Sanitation & Trash - \$209,000 (FY 17/18)

The Public Works Department has been funding regular sanitation clean-ups of homeless encampments throughout the City beginning in 2014.

Public Works – Clean-up Efforts Marginally Housed Response Team (MHRT)	
<i>Fiscal Year</i>	<i>Budget</i>
FY 15/16	\$269,000
FY 16/17	\$368,000
FY 17/18	\$209,000
FY 18/19	\$396,824 <i>(Projected \$500,000)</i>
Total	\$1,242,824

Despite limited resources and the recent loss of the program coordinator, the number of clean-ups orchestrated by Public Works has increased. In FY 18/19 Public Works managed and closed ninety-three (93) reports of homeless encampments, representing 938 homeless individuals and 433 tons of trash collected. More recently, with assistance from the Mayor, Public Works was able to coordinate a clean-up along the Union Pacific (UP) Railroad right of way in Chinatown. The City is continuing to put pressure on UP to maintain its right of way, but since this issue is occurring throughout the state, it is unclear that UP will be diligent about future clean-up efforts. In March 2019, Public Works set a record for trash collection, removing approximately twenty-nine (29) tons of trash from under the Sanborn Bridge and is projected to spend at least \$500,000 this year.

To address the need for a sustainable approach to sanitation, Public Works launched a Trash Design Team and Advisory Committee, focusing on a Trash Reduction Implementation Strategy for the City to reach zero waste in storm drains. This program began implementation in January and is particularly focused in Chinatown and other areas impacted by homelessness.

Code Enforcement

Code Enforcement is responsible for working with owners to address encampments on private property. In 2018, Code Enforcement received forty (40) reports of encampments, twenty-four of those cases were determined to be valid. Through the work of Code Enforcement Officer, Matt Pierce several properties have been cleaned up and secured. Code Enforcement also works on blighted properties that may have unauthorized occupants including homeless, working effectively with the Fire and Legal Departments to properly secure these buildings and limit safety risks.

Private Security

The City also employs private security to address issues related to homelessness. For example, private security is utilized at the Steinbeck Library, Recreational Center, 65 W. Alisal, Sherwood Park, and at the Intermodal Transit Facility. This has helped reduce impacts that are caused by homelessness.

Economic Development

Downtown Streets Team (DST) - \$80,000

To address our challenges with trash and debris created by marginally housed populations, the City plans to launch a new job program for homeless in July 2019, known as the Downtown Streets Team (DST). More than just a clean-up service, DST incorporates homeless outreach, case management, and housing navigation services. The annual estimated cost of the DST program is \$320,000, less expensive than the City's ongoing clean-ups. It is anticipated that this program would start in Chinatown and ultimately may be moved to other areas experiencing these challenges particularly in and around our parks. DST provides case management that results with assisting people in obtaining vital documents, housing navigation services, Medical benefits, SSA, treatments and court hearings to assist participants on a pathway to stabilization, jobs and housing.

Housing

CDBG & HOME Affordable Housing Multi-Family Projects

In FY 2017-18, the City used CDBG and HOME grant funds for various housing activities that expanded the supply of decent, safe, sanitary and affordable housing. The bulk of CDBG and HOME housing development funds were passed through Monterey County Housing Authority Development Corporation (MCHADC) and Mid-Peninsula Housing Inc. (MidPen) to fill in financing gaps in multi-million-dollar affordable housing projects.

- Haciendas Phase III (Hikari): The project was awarded \$500,000 of HOME funds for construction purposes. The project is in the final phase of construction. The project recently received a temporary Certificate of Occupancy (COO). The project is expected to receive a final COO by March 2019.

- Moon Gate Plaza (21 Soledad Street): The project was awarded \$575,494 of CDBG funds for environmental remediation purposes. The project was also awarded \$91,566 of HOME funds for construction purposes. The project was awarded California Tax Credit Allocation Committee (CTCAC) funding. City staff worked with MidPen to complete the property transfer along with all environmental site remediation work. The project is currently under construction and expected to be completed by December 2019.

FY 2017-18 CDBG & HOME Affordable Housing Multi-Family Rental Projects					
Agency	Project Name	Description	Total # of Units	Budget	Est. Completion Date
MCHADC	Hikari (Haciendas Phase III)	New construction, multi-family residential low-income rental project	50	HOME \$500,000	March 2019
MidPen	Moon Gate Plaza Project (21 Soledad Street)	New construction, multi-family residential low-income rental project	90	CDBG/Activity Delivery \$575,494/\$20,747 HOME \$91,566	December 2019
Total			140	CDBG: \$596,695 HOME: \$591,566	

City/County Collaboration on Housing & Homelessness

On October 9, 2018, City Council authorized the City Manager to execute a Memorandum of Understanding (MOU) establishing roles and responsibilities for the development of a shelter at 855 East Laurel Drive, Permanent Supportive Housing at 1220 Natividad Road, and continuation of the Warming Shelter at 111 West Alisal until the new shelter is operational.

Homeless Shelter – 855 E. Laurel Dr.

For many years, the City and County have been discussing ways to move forward quickly with the development of a homeless shelter. Through the California’s Homeless Emergency Aid Program (HEAP), both jurisdictions recognized an opportunity to apply for funds for the construction of a 24-hour emergency shelter. The County identified 855 E. Laurel as the best site for the shelter given the need to move through an accelerated process to construct the shelter.

The County will assume the lead on the HEAP application and has initiated early conceptual design work to facilitate the CEQA process and future community meetings. The application is due April 1st. After the application is submitted, the City will assist the County in scheduling future community meetings to discuss shelter operations.

Prior to the adoption of the MOU, the City organized an official community meeting on October 1st to discuss the proposal. Councilmembers in Districts 1 and 6 have also organized meetings where the shelter was discussed, and City staff continue to meet with small groups of residents to discuss shelter operations. Several neighborhood groups have either expressed opposition to the proposed shelter location, or frustration due to lack of community engagement.

Last budget year, City Council allocated \$125,000 for pre-development costs for the shelter or permanent supportive housing. The City has allocated \$100,000 to the County for initial conceptual design work on the shelter to facilitate the application process, CEQA, and community engagement.

Permanent Supportive Housing - 1220 Natividad Rd.

More than just providing temporary shelter, the City and County recognize that the shelter must be used as a bridge to permanent housing to effectively reduce homelessness. As a result, the MOU also includes development of 1220 Natividad for permanent supportive housing. With the recent passage of the \$4 billion housing bond measure, additional funding may be available to construct housing at 1220 Natividad. Under the MOU city staff will act as the lead project manager and facilitator for the RFP process in order to select a qualified housing developer for the site. Staff anticipate releasing the RFP in May. This will allow time to engage the community in discussions regarding the vision for housing at this location.

Shelter Bed/Transitional Housing Inventory

The City Housing Division staff initiated a homeless housing database through its online grant management software system (City Data Services) in collaboration with regional homeless service providers. The database lists properties within Monterey and San Benito Counties, showing the total number of shelter beds that are available or occupied at any given time. The goal is to use the database to more efficiently place homeless in shelter beds.

Coordination Among External Partners

As described above, the City's coordination with the County on homelessness has significantly improved especially with the implementation of the MOU on the homeless shelter and permanent supportive housing. Recently, the County hired former staff Anastacia Wyatt to serve as their Housing Manager, which has facilitated even greater homeless coordination.

In addition to our work with the County Departments of Social Services, Health, and Resource Management Agency, the City is working with the Continuum of Care (CoC) to implement homeless programs and services at a regional level. Through our regional and citywide efforts, the City has established a strong network of public and private housing and social service agencies that provide an increased level of service for homeless and those at-risk of homelessness.

City staff also coordinate closely with the CoC collaborative applicant, the Coalition for Homeless Service Providers (Coalition) and participate in the following committee meetings: Administration and Implementation, Housing Pipeline, Homeless Management Information System (HMIS), and Homeless Prevention and Rapid Rehousing Program (HPRP). The Leadership Council is responsible for guiding the CoC. The Mayor represents the City on the Leadership Council and

Councilwoman De La Rosa serves as the alternate. City staff also attend the meetings to provide technical support to our elected officials.

Lead Me Home Plan

Lead Me Home is a regional plan, 10-year plan to end homelessness. The Plan is the guiding document for the Leadership Council and the Coalition and helps direct funding for homeless programming. The Monterey County Health Department is working on development of an application for funding for No Place Like Home funding. To be eligible for this grant, the Lead Me Home Plan must be updated. The City has agreed to lead this update under an existing contract with Urban Initiatives to facilitate completion of this task by the April. The City will continue to work with the County, Coalition, and Leadership Council to complete a more comprehensive update of the Lead Me Home Plan next year.

No Place Like Home Funding

The City is proposing to utilize a portion of its CESH funding to assist with updating of the existing 10 Yr. Plan to End Homelessness (Homeless Plan). By updating the Homeless Plan, Monterey and San Benito Counties would be eligible for certain funding programs such as No Place Like Home.

Chinatown Revitalization Plan (\$228,920)

The Chinatown Revitalization Plan (Plan), currently under development, will devise innovative strategies relevant to current economic conditions to revitalize and enhance the economic, social, and cultural fabric of the City's Chinatown Neighborhood. The City began the planning process in December 2016 and anticipates completion in September of this year. Although the Plan is broader than just homelessness, it will incorporate multiple strategies aimed at transitioning residents living on the streets into housing. Urban Initiatives is the consultant for the Plan's homeless strategies.

Chinatown Homeless Action Team (CHAT)

The City of Salinas participates in the Chinatown Homeless Action Team (CHAT) with representatives of the Coalition of Homeless Service Providers, Interim Inc., California State University Monterey Bay (CSUMB), Sun Street Centers, Mid-Peninsula Housing Coalition, Housing Resource Center of Monterey County (HRC) and the Franciscan Workers of Junipero Serra. CHAT meets monthly.

California Emergency Solutions and Housing (CESH)

The City has hired a contractor to serve as the CESH Program Manager. The Program Manager will coordinate a pilot program in Chinatown and Downtown that includes focused street outreach and housing navigation services to help move homeless from the streets into Moongate Plaza and other housing projects. The City, as the CESH grant administrator, will conduct periodic surveys to determine the population needs within Chinatown and ensure that service providers are matched to the needs of each individual client through Coordinated Entry and HMIS. Once this match is conducted, the Chinatown Project will concentrate on individual needs, housing one client at a time. Subrecipients of CESH funding will participate in weekly case management to discuss program participants to achieve the outcome of reducing homelessness in Chinatown. The lessons

learned through this pilot program will serve as a best practice to inform other regional homeless efforts.

1st and 2nd Annual Chinatown Block Party

The City of Salinas in conjunction with New Harvest Christian Fellowship Group, Coalition of Homeless Services Providers, Dorothy's Place, MidPen Inc., PG&E, the Monterey County Housing Authority, Victory Mission, Chinatown Health Services Center, Interim Inc., Central Coast Center for Independent Living organized the 1st Annual Chinatown Block Party- 1st Step to Housing, which occurred on November 18, 2017. The 2nd Annual Chinatown Block Party – Housing Starts in Chinatown occurred on November 17, 2018 and was organized by the City, Salinas Upper Room Church, Buddhist Temple and other non-profit organizations and community members. The event was a great success with 300 to 400 people in attendance. Homeless individuals were assisted in their first step to housing by connecting them to housing services and resources. In addition, the intent of this event was to change the perception of the neighborhood by creating a safe and welcoming place where economic growth can occur.

Local Economic Advisory Program (LEAP)

The Local Economic Advisory Program (LEAP) was a 2-day event that happened on April 11 and 12, 2018 as part of the Chinatown Revitalization Plan. The goal of this event was to help community leaders, City officials, and stakeholders understand Chinatown's local economy, learn about economic development, and identify and build consensus around an action plan on ways to revitalize Chinatown. Thirty-four (34) interviews were conducted with stakeholders, residents, homeless service providers, community organizations, and City and County staff. In total, eighty-four (84) people participated and contributed ideas on how to revive Chinatown's economy. One of the report's recommendations is to immediately focus on reducing homeless encampments as way to encourage the return of viable small creative businesses and incentivize building improvements.

Brownfields Grant

The City of Salinas submitted the Brownfields Wide Assessment Grant application on January 31, 2019 to the Environmental Protection Agency (EPA). The requested grant amount was \$300,000 (\$180,000 for Hazardous Substances and \$120,000 for Petroleum assessment). If the City is awarded funding, Phase I and II site investigations would be initiated along Soledad Street on parcels with the potential of hazardous material and/or petroleum contamination. Once sites and soil conditions are characterized through the Phase I and II process, the City would apply for additional cleanup grants through the EPA.

DEPARTMENT COORDINATION:

Although the Community Development Department was tasked with writing this Administrative Report, every City Department has been critical in carrying out this work. The departments that contributed with their ongoing partnership, staff time and resources (in no particular order) include: Finance, Public Works, Legal, Administration, Police, Fire, and Library and Community Services

Department	Contribution
Finance	Assists in helping manage grant revenue and expenditures related to homelessness.
Public Works	Assists in sanitation efforts for marginally housed populations in parks and other public rights of way; Manages public assets such as the Chinatown Health Center; Participates in the development and implementation of the Chinatown Revitalization Plan.
Legal	Provides legal guidance on homeless policy and legislation and approves all contracts related to the provision of homeless services.
Administration (City Manager)	Provides oversight on the City's homeless activities and coordinates with the Mayor and City Council to ensure alignment with the Strategic Plan.
Police	Provides immediate emergency response to homeless residents; Ensures the safety of other city departments engaged in the provision of homeless services; Participates in the development and implementation of the Chinatown Revitalization Plan; and Implements community policing through provision of a HOT Officer.
Fire	Provides emergency medical services to the homeless; Protects property and neighborhoods from fire due to homeless encampments; and Coordinates with building and code enforcement to ensure safe buildings and adequate property maintenance.
Libraries and Community Services	Assist in community engagement around homelessness and housing; Provides community programs at the libraries, parks, and community centers that serve homeless residents; and Participates in the development and implementation of the Chinatown Revitalization Plan.

CEQA CONSIDERATION:

Not a Project. The City of Salinas has determined that the proposed action, acceptance of an administrative report on the City's activities to address homelessness is not a project as defined by the California Environmental Quality Act (CEQA) (CEQA Guidelines Section 15378).

STRATEGIC PLAN INITIATIVE:

Although homelessness efforts are specifically outlined under Quality of Life in the Strategic Plan, the activities in the Administrative Report also advances the Goals of: Economic Diversity and Prosperity; Safe, Livable Community; Effective, Sustainable Government; and Well-Planned City and Excellent Infrastructure. For many of our residents, the lack of safe, decent affordable housing and homelessness have become the most pressing issue the City faces.

FISCAL AND SUSTAINABILITY IMPACT:

The Administrative Report has no direct fiscal impact as it only outlines various departmental activities that have already been budgeted. Unforeseen expenditures particularly around clean-up efforts were budgeted at mid-year. Many of the expenditures highlighted in this report are funded through grants such as the CDBG, HOME, and ESG Programs. During the Fiscal 19/20 budget process, City Council may provide additional funding to those activities that are most effective in addressing homelessness.

ATTACHMENTS: None