



JAMES SORENSEN
COMMUNITY DEVELOPMENT
DIRECTOR

MONICA ZOLTANSKI
MAYOR

SHANE E. PACE
CHIEF ADMINISTRATIVE
OFFICER

Staff Report Memorandum January 19, 2023

To: City Council via Planning Commission
From: Community Development Department
Subject: Moderate Income Housing Element Amendment
(General Plan Amendment)

GPA01052023-6462

Hearing Notice: This item has been noticed by mail to affected entities, on public websites, and at public locations.

Request

The Community Development Department is proposing an amendment to the Implementation Plan of the Moderate Income Housing Element of the Sandy City General Plan. The purpose of this proposed amendment is necessary in order to qualify for priority consideration of certain transportation funding. This is in response to a letter received from the Utah Department of Workforce Services (Exhibit "A").

Background

Revisions to Utah Code in 2022 by House Bill 462 required that Sandy City amend the Sandy City General Plan. Per HB 462, Sandy City was required, among other things, to do the following:

- Select a minimum of four moderate-income housing implementation strategies from a revised list.
- Two additional strategies would be required to receive priority consideration when requesting certain State transportation funds.
- Prepare an implementation plan for each of the selected strategies.
- Amend the General Plan to include a new chapter (Moderate Income Housing Element).
- Complete the above requirements and submit the Moderate-Income Housing Element to the State by October 1, 2022.

On August 18, 2022, the Planning Commission passed a motion, recommending to the City Council that they approve a General Plan amendment intended to comply with the requirements of HB 462. The amendment included two additional strategies to be eligible for priority consideration of the transportation funds. On September 6, 2022, the City Council approved Ordinance #22-10, adopting the proposed General Plan amendment, and Resolution #22-47C, authorizing submittal to the State. Subsequently, City staff submitted the required documents to the Utah Department of Workforce Services, per HB 462, prior to the October 1, 2022 deadline.

Property Case History	
Case Number	Case Summary
GPA-7272022-6366	Adoption of a Moderate Income Housing Element, including implementation strategies and an implementation plan, as part of the General Plan and authorization to submit, as required, to the State.

Alyssa Gamble, with the Housing and Community Development Division of the Utah Department of Workforce Services, emailed a letter to certain Sandy City officials and staff on November 22, 2022. The letter documented the State’s review of Sandy City’s submittal. The letter states that “the Housing and Community Development Division has reviewed the plan and report and finds that they comply with the requirements set forth in section 10-9a-403(2)(b).” However, the letter also mentions that the State did not accept one (Strategy P) of the City’s adopted implementation strategies, which results in the City not being eligible for priority consideration for affected transportation funding. Upon further discussion with Alyssa Gamble by staff, Strategy P (use of RDA moderate income housing set-aside funds) was not accepted due to a lack of detail in the Implementation Plan.

Public Notice and Outreach

Utah Code (Part 10-9a-2) requires that a notice of intent and notice of public hearing be posted. A combined notice (Exhibit “B”), including the requirements for both notices, was prepared and posted to the Utah Public Notice website and the City website. Physical copies were also posted in public locations. The notice was mailed to affected entities.

Analysis

HB 462 allows 90 days for cities to correct comments provided by the State upon their review. According to Alyssa Gamble, based on the date of notification, Sandy City has until February 27, 2023, to submit revisions. City staff determined to prepare an amendment to the Moderate Income Housing Element of the General Plan, with the intent to resolve the issue in order to qualify for priority consideration for affected transportation funds. RDA housing set-aside funds are administered by the Sandy City Economic Development Department based on direction from the Sandy City RDA Board. The Economic Development Department has identified additional details regarding the implementation of those housing set-aside funds (Strategy P). Those details have been incorporated into the proposed amendment.

Recommendation

Staff recommends that the Planning Commission forward a positive recommendation to the City Council to amend the Sandy City General Plan, revising the current implementation plan of the Moderate Income Housing Element (Exhibit “C”) as proposed (Exhibit “D”) based on the following findings:

Findings:

1. It was the City’s intent, when processing for approval the current Moderate Income Housing Element, to qualify for priority consideration for affected State transportation funds by adopting two additional housing implementation strategies.
2. The State’s review of the Sandy City Moderate Income Housing Element determined that, while the document is in compliance with the minimum requirements for a Moderate Income Housing Element, the City did not get credit for Strategy P (use of RDA housing set-aside funds) due to a lack of detail in the Implementation Plan. As a result, the City did not qualify for the priority consideration.
3. Utah Code (Section 10-9a-408(7)) allows for 90 days to resolve issues identified by the State’s review of a city’s

Moderate Income Housing Element.

4. The Economic Development Department, responsible for administering RDA housing set-aside funds, identified additional details regarding the future use of those funds.
5. Upon internal consultation among City staff, a decision was made to process a General Plan amendment in an effort to resolve the issue and to meet the City's original intent to qualify for priority consideration for State transportation funding.

Planner:



Jake Warner
Long Range Planning Manager

File Name: S:\Users\PLN\STAFFRPT\2023\GPA01052023-6462 MIH Implementation Amend

Exhibit "A"

(Moderate Income Housing Report – 2022 Notice of Compliance)



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

**Department of
Workforce Services**

CASEY R. CAMERON
Executive Director

GREG PARAS
Deputy Director

NATE MCDONALD
Deputy Director

KEVIN BURT
Deputy Director

November 22, 2022

To: Mayor and City Council
Sandy City

From: Department of Workforce Services
Housing and Community Development Division

Re: Moderate Income Housing Report – 2022 Notice of Compliance

Dear Sandy City Mayor and City Council,

Thank you for submitting your City's Moderate Income Housing report for this year in fulfillment of requirements set forth in State Code section 10-9a-408(2)(b). The Housing and Community Development Division has reviewed the plan and report and finds that they comply with the requirements set forth in section 10-9a-403(2)(b).

Unfortunately, Sandy City did not meet the necessary requirements for 10-9a-408(5)(a)(ii)(A) and is not eligible for Priority Consideration in the 2024 fiscal year for Transportation Commission funding for transportation projects within the boundaries of the municipality and Governor's Office of Planning and Budget Covid-19 Local Assistance Matching Grant Program. While the community included six strategies in the Housing Element of the General Plan, strategy P did not include implementation plans and timelines with specific future activities and the City does not receive credit for this strategy.

Section 10-9a-408(2)(c) requires each municipality's report starting in 2023 to describe action taken by the municipality towards implementation of the selected strategies, including how each land use decision or regulation supports the implementation of the moderate income housing strategies, barriers encountered, accessory dwelling unit information, the market's response to the strategies and implementation plans, and recommendations to the State regarding how the State can support the municipality in implementing strategies. As you prepare for next year's reporting, please keep those key points in mind and start collecting any necessary information now. The Division is working on a database of information to help you complete those reports and should have that available soon.



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If you have any questions or concerns, please contact Alyssa Gamble at angamble@utah.gov or 385-249-4808. I am available to discuss any questions, comments, or concerns. You may add a time to my calendar using this link: <https://calendar.app.google/GWQagr3YuLmKxkaJ7>.

Sincerely,

Alyssa Gamble
Program Manager – Moderate Income Housing Database
Housing and Community Development
Department of Workforce Services

Exhibit "B"

(Combined Notice of Intent and Notice of Hearing)

SANDY CITY
PLANNING COMMISSION
PUBLIC NOTICE
GENERAL PLAN AMENDMENT
MODERATE INCOME HOUSING ELEMENT
GPA01052023-6462

Notice is hereby given of intent to amend the Sandy City General Plan and to hold a public hearing before the Sandy City Planning Commission on January 19, 2023 at approximately 6:15 p.m. The purpose of the proposed amendment is to make revisions to the implementation plan of the Moderate Income Housing Element. The proposed amendment is not applicable to any specific location, but would apply generally throughout the City. Following the public hearing, the Planning Commission will forward a recommendation to the City Council. The City Council will review the proposal and make a final decision in meetings currently scheduled for January 24, 2023 and January 31, 2023.

This Planning Commission meeting will be conducted both in-person (in the Sandy City Council Chambers at City Hall, 10000 S. Centennial Pkwy.), and via Zoom Webinar (see details below). Affected entities are invited to provide information for consideration concerning impacts and conflicts that may occur due to the proposed amendment. All interested parties may attend and participate in the meeting either in-person or by accessing the meeting using the Zoom webinar link below. Please forward this information to others who may be interested. Attendees wishing to comment who are participating virtually must have a microphone connected to their device (smartphone, laptop, desktop, etc.), otherwise you'll only be able to view the proceedings. A listen-only option is also available by telephone using the phone numbers provided below.

A draft of the Moderate Income Housing Element will be available for review starting on January 9, 2023 at City Hall (10000 S. Centennial Parkway), on the City's website (<https://www.sandy.utah.gov/797/Long-Range-Planning>), or upon request. Interested parties may provide comments prior to the meeting (no later than 4 p.m.) to Jake Warner, at 801-568-7262 or by email at: jwarner@sandy.utah.gov.

How to join Zoom Webinar General Instructions:

- Join on via laptop, desktop or mobile device
- Go to www.zoom.us
- Click 'join a meeting', in the top right-hand corner
- Enter Meeting ID: 891 5325 5803 and click "Join."
- Enter Meeting Password: 401751
- A download should start automatically in a few seconds. If not, click "download here."
- Open download, meeting should begin at 6:15 p.m.
- To make a comment: Select "Participants" in the lower center of the screen. In the Participant Window, select "Raise A Hand" at the lower left to indicate that you would like to make a comment.

You can also join directly through this URL:

https://us02web.zoom.us/webinar/register/WN_W4zVNh3BSjuQRHiwuuCDaQ

Or join by phone (choose based on your current location):

US: +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 669 444 9171

Webinar ID: 891 5325 5803

Or find your local number: <https://us02web.zoom.us/j/89153255803>

Exhibit "C"

(current Implementation Plan of the Moderate Income Housing Element)

Implementation Plan

8/8/2022

STRATEGY		IMPLEMENTATION		
Utah Code	City Objectives	Action #	Implementation Actions	Timing
(V) Station Area Plans				
10-9a-403(2)(b)(ii)(V) - Develop and adopt a station area plan in accordance with Section 10-9a-402.1				
<ul style="list-style-type: none"> Prioritize affordable housing and increased supply near transit Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) 	V.1	Identify required locations.	2022	
	V.2	Determine resources needed to prepare plans	2022	
	V.3	Fund necessary resources.	2022	
	V.4	Determine a process to conduct planning.	2022	
	V.5	Inform the public, specifically affected residents and businesses, of the process, potential impact, and ways to be involved.	2023	
	V.6	Conduct public engagement and analysis.	2023	
	V.7	Plans certified by WFRC and approved by City Council.	2024	
	V.8	Prepare and adopt necessary revisions to land use regulations for two stations.	2025	
	V.9	Prepare and adopt necessary revisions to land use regulations for two stations.	2026	
	V.10	Monitor the progress and impacts of completed actions.	Ongoing	
	V.11	Evaluate the implementation of the strategy.	2027	
(G) Density and MIH Near Transit (regulations)				
10-9a-403(2)(b)(iii)(G) - Amend land use regulations to allow for higher density or new moderate income residential development in commercial or mixed-use zones near major transit investment corridors.				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Reduce barriers to homeownership (increase supply, reduce cost) Limit impacts on existing residents (regulations, taxes, physical) Prioritize affordable housing and increased supply near transit 	G.1	Prepare and adopt a comprehensive update to the master plan for Sandy City's "downtown" area.	Complete	
	G.2	Prepare and adopt regulations to implement the "downtown" master plan.	Complete	
	G.3	Amend The Cairns Design Standards to include the Stadium Village Sub-District.	2023	
	G.4	Study the potential of including residential uses to help revitalize commercial centers.	2023	
	G.5	Conduct a study to assess the housing needs of certain target populations.	2023	
	G.6	Conduct a study to determine the jobs to housing ratio to determine a suitable balance and identify actions to achieve that balance.	2023	
	G.7	Audit existing zones and zoning regulations to identify revisions that may be necessary to achieve or facilitate desired outcomes.	2025	
	G.8	Process code amendments as necessary revisions have been identified.	2026	
	G.9	Inform the public of the purpose of The Cairns Master Plan.	Ongoing	
	G.10	Pursue opportunities to implement and promote The Cairns Master Plan.	Ongoing	
	G.11	Prioritize moderate income housing along the light rail corridor when considering rezoning applications.	Ongoing	
	G.12	Monitor the progress and impacts of completed actions.	Ongoing	
	G.13	Evaluate the implementation of the strategy.	2027	
(E) Accessory Dwelling Units				
10-9a-403(2)(b)(ii)(E) - Create or allow for, and reduce regulations related to, internal or detached accessory dwelling units in residential zones.				
<ul style="list-style-type: none"> Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) Limit impacts on existing residents (regulations, taxes, physical) Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) 	E.1	Adopt a city-wide ordinance for residential zones.	Complete	
	E.2	Process a code amendment to convert from a CUP to a permitted use.	Complete	
	E.3	Inform the public to raise public awareness.	2023	
	E.4	Review the potential for additional revisions to the code.	2023	
	E.5	Study the potential for external ADUs.	2023	
	E.6	Conduct proactive code enforcement to promote good property management and to educate landlords.	Ongoing	
	E.7	Monitor the progress and impacts of completed actions.	Ongoing	
	E.8	Evaluate the implementation of the strategy.	2027	
(H) Parking Requirements				
10-9a-403(2)(b)(ii)(H) - Amend land use regulations to eliminate or reduce parking requirements for residential development where a resident is less likely to rely on the resident's own vehicle, such as residential development near major transit investment corridors or senior living facilities.				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) Limit impacts on existing residents (regulations, taxes, physical) Prioritize affordable housing and increased supply near transit 	H.1	Conduct a code amendment to reduce parking requirements for residential projects, particularly MIH, near transit.	Complete	
	H.2	Amend The Cairns design standards to include the Stadium Village Master Plan.	2023	
	H.3	Inform the public to raise awareness of requirements and potential benefits.	2023	
	H.4	Conduct a study to better assess parking needs of target populations near transit.	2023	
	H.5	Amend parking requirements as determined necessary.	2024	
	H.6	Monitor the progress and impacts of completed actions.	Ongoing	
	H.7	Evaluate the implementation of the strategy.	2027	
(Q) Housing and Transit Reinvestment Zone				
10-9a-403(2)(b)(iii)(Q) - Create a housing and transit reinvestment zone pursuant to Title 63N, Chapter 3, Part 6, Housing and Transit Reinvestment Zone Act.				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Prioritize affordable housing and increased supply near transit 	Q.1	Identify potential areas for a THRZ.	2022	
	Q.2	Inform decision makers of the potential opportunities of utilizing this strategy as an affordable housing tool.	2022	
	Q.3	Review site with the City Council.	2022	
	Q.4	Identify a potential partner/developer for the proposed site.	2022	
	Q.5	Submit for approval.	2022	
	Q.6	Upon approval, finalize establishment of THRZ.	2023	
	Q.7	Process entitlements for projects within the THRZ.	2023-2024	
	Q.8	Start construction of projects THRZ.	2025	
	Q.9	Monitor the progress and impacts of completed actions.	Ongoing	
	Q.10	Evaluate the implementation of the strategy.	2027	
(P) MIH Set Aside Funds				
10-9a-403(2)(b)(iii)(P) - Demonstrate utilization of a moderate income housing set aside from a community reinvestment agency, redevelopment agency, or community development and renewal agency to create or subsidize moderate income housing.				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Reduce barriers to homeownership (increase supply, reduce cost) Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) 	P.1	Inform RDA board of potential uses of set-aside funds and review current practices to determine other actions to meet MIH needs.	Complete	
	P.2	Utilize funds to rehab/redevelop blighted buildings/areas for MIH.	Ongoing	
	P.3	Utilize funds to retain MIH to be available to eligible city employees.	Ongoing	
	P.4	Monitor the progress and impacts of completed actions.	Ongoing	
	P.5	Evaluate the implementation of the strategy.	2027	

Exhibit "D"

(proposed Implementation Plan of the Moderate Income Housing Element)

Implementation Plan
1/5/2023

STRATEGY		IMPLEMENTATION		
Utah Code	City Objectives	Action #	Implementation Actions	Timing
(V) Station Area Plans				
10-9a-403(2)(b)(iii)(V) - <i>Develop and adopt a station area plan in accordance with Section 10-9a-403.1.</i>				
<ul style="list-style-type: none"> Prioritize affordable housing and increased supply near transit Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) 	V.1	Identify required locations.	2022	
	V.2	Determine resources needed to prepare plans.	2022	
	V.3	Fund necessary resources.	2022	
	V.4	Determine a process to conduct planning.	2022	
	V.5	Inform the public, specifically affected residents and businesses, of the process, potential impact, and ways to be involved.	2023	
	V.6	Conduct public engagement and analysis.	2023	
	V.8	Prepare and adopt necessary revisions to land use regulations.	2024	
	V.7	Plans certified by WFRCA and approved by City Council.	2024	
	V.10	Monitor the progress and impacts of completed actions.	Ongoing	
	V.11	Evaluate the implementation of the strategy.	2027	
(G) Density and MIH Near Transit (regulations)				
10-9a-403(2)(b)(iii)(G) - <i>Amend land use regulations to allow for higher density or new moderate income residential development in commercial or mixed-use zones near major transit investment corridors.</i>				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Reduce barriers to homeownership (increase supply, reduce cost) Limit impacts on existing residents (regulations, taxes, physical) Prioritize affordable housing and increased supply near transit 	G.1	Prepare and adopt a comprehensive update to the master plan for Sandy City's "downtown" area.	Complete	
	G.2	Prepare and adopt regulations to implement the "downtown" master plan.	Complete	
	G.3	Amend The Cairns Design Standards to include the Stadium Village Sub-District.	2023	
	G.4	Study the potential of including residential uses to help revitalize commercial centers.	2023	
	G.5	Conduct a study to assess the housing needs of certain target populations.	2023	
	G.6	Conduct a study to determine the jobs to housing ratio to determine a suitable balance and identify actions to achieve that balance.	2023	
	G.7	Assess the feasibility of increased transit within The Cairns.	2024	
	G.8	Audit existing zones and zoning regulations to identify revisions that may be necessary to achieve or facilitate desired outcomes.	2025	
	G.9	Process code amendments as necessary revisions have been identified.	2026	
	G.10	Inform the public of the purpose of The Cairns Master Plan.	Ongoing	
	G.11	Pursue opportunities to implement and promote The Cairns Master Plan.	Ongoing	
	G.12	Prioritize moderate income housing along the light rail corridor when considering rezoning applications.	Ongoing	
	G.13	Monitor the progress and impacts of completed actions.	Ongoing	
	G.14	Evaluate the implementation of the strategy.	2027	
(E) Accessory Dwelling Units				
10-9a-403(2)(b)(iii)(E) - <i>Create or allow for, and reduce regulations related to, internal or detached accessory dwelling units in residential zones.</i>				
<ul style="list-style-type: none"> Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) Limit impacts on existing residents (regulations, taxes, physical) Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) 	E.1	Adopt a city-wide ordinance for residential zones.	Complete	
	E.2	Process a code amendment to convert from a CUP to a permitted use.	Complete	
	E.3	Inform the public to raise public awareness.	2023	
	E.4	Review the potential for additional revisions to the code.	2023	
	E.5	Study the potential for external ADU's.	2023	
	E.6	Conduct proactive code enforcement to promote good property management and to educate landlords.	Ongoing	
	E.7	Monitor the progress and impacts of completed actions.	Ongoing	
	E.8	Evaluate the implementation of the strategy.	2027	
(H) Parking Requirements				
10-9a-403(2)(b)(iii)(H) - <i>Amend land use regulations to eliminate or reduce parking requirements for residential development where a resident is less likely to rely on the resident's own vehicle, such as residential development near major transit investment corridors or senior living facilities.</i>				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) Limit impacts on existing residents (regulations, taxes, physical) Prioritize affordable housing and increased supply near transit 	H.1	Conduct a code amendment to reduce parking requirements for residential projects, particularly MIH, near transit.	Complete	
	H.2	Amend The Cairns design standards to include the Stadium Village Master Plan.	2023	
	H.3	Inform the public to raise awareness of requirements and potential benefits.	2023	
	H.4	Conduct a study to better assess parking needs of target populations near transit.	2023	
	H.5	Amend parking requirements as determined necessary.	2024	
	H.6	Monitor the progress and impacts of completed actions.	Ongoing	
	H.7	Evaluate the implementation of the strategy.	2027	
(Q) Housing and Transit Reinvestment Zone				
10-9a-403(2)(b)(iii)(Q) - <i>Create a housing and transit reinvestment zone pursuant to Title 63N, Chapter 3, Part 6, Housing and Transit Reinvestment Zone Act.</i>				
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Prioritize affordable housing and increased supply near transit 	Q.1	Identify potential areas for a HTRZ.	2022	
	Q.2	Inform decision makers of the potential opportunities of utilizing this strategy as an affordable housing tool.	2022	
	Q.3	Review site with the City Council.	2022	
	Q.4	Identify a potential partner/developer for the proposed site.	2022	
	Q.5	Submit for approval.	2022	
	Q.6	Upon approval, finalize establishment of HTRZ.	2023	
	Q.7	Process entitlements for projects within the HTRZ.	2023-2024	
	Q.8	Start construction of projects HTRZ.	2025	
	Q.9	Monitor the progress and impacts of completed actions.	Ongoing	
	Q.10	Evaluate the implementation of the strategy.	2027	

(P) MIH Set Aside Funds			
10-9a-409(2)(b)(iii)(P) - Demonstrate utilization of a moderate income housing set aside from a community reinvestment agency, redevelopment agency, or community development and renewal agency to create or subsidize moderate income housing.			
<ul style="list-style-type: none"> Support revitalization efforts (commercial areas, dilapidated housing, conversion of use) Reduce barriers to homeownership (increase supply, reduce cost) Improve availability of affordable housing, specifically for seniors, younger families, disabled, City employees (emergency services) 	P.1	Inform RDA board of potential uses of set-aside funds and review current practices to determine other actions to meet MIH needs.	Complete
	P.2	Utilize funds to rehab/redevelop blighted buildings/areas for MIH.	Ongoing
	P.2.1	House built by CTEC and sold to LMH on second lot of Property 1 (150 W. Cottage Ave.) redeveloped and donated by City	2023
	P.2.2	House built by CTEC and sold to LMH on third lot of Property 1 redeveloped and donated by City	2024
	P.3	Utilize funds to retain MIH to be available to eligible City employees.	Ongoing
	P.3.1	Property 2 (9392 S. 500 W.) currently occupied by eligible City employee	Ongoing
	P.3.2	Property 4 (104 E. 8960 S.) currently occupied by eligible City employee	Ongoing
	P.3.3	Property 6 (9016 S. 1300 E.) to be rented to eligible City employee or sold with	2023
	P.3.4	Property 2 to be sold, funds to be reinvested in vacant property for future MIH use.	2024
	P.4	Workshop with RDA Board to evaluate use of vacant or unoccupied properties - currently Properties 3 (8971 S. 90 E.), 5 (132 E. 8960 S.), & 7 (111 E. 9000 S.)	2023
	P.5	Monitor the progress and impacts of completed actions.	Ongoing
	P.6	Evaluate the implementation of the strategy.	2027