

July 10, 2023

Mayor Cam Guthrie and Council  
Guelph City Hall  
1 Carden Street  
Guelph, ON

**Re: City of Guelph Council Orientation and Education Workshop, July 11, 2023**

Dear Mayor Guthrie and Council,

Last month a ([growing](#)) group of concerned citizens and community leaders submitted a letter to you with an urgent message: Guelph has a housing crisis. We have all already acknowledged that the crisis exists, and that the crisis is not just a Guelph problem<sup>1</sup>. Moreover, we all have a role to play in identifying and implementing solutions.

This call to action is not about blaming City Hall or Council for this crisis. Rather, the intent is to ask that Council take on the political and moral leadership that is required to address this crisis. We acknowledge that the request is suggesting a different kind of role for council, but it is necessary because it reflects the complexity and seriousness of the housing crisis in Guelph.

Solving this crisis requires our community - our leadership, industry, and citizens - to do things that have not been done before. We must produce more homes at an unprecedented level. This is our call to action to be leaders on this issue.

The July 11 Council Orientation and Education Workshop is a welcomed first step in the action that is required. In support of this discussion – and beyond – we have outlined a set of actionable priorities that we believe are necessary to make meaningful progress on the housing crisis. The details include identifying the various levels of government, stakeholders and partners associated with each priority. We would welcome the opportunity to discuss these ideas further.

In short, our recommendations include:

- Ensuring a point person is in place who is responsible for making and reporting on progress on the collective plans.
- Addressing emergency housing needs – now.
- Fast tracking and innovating on affordable Purpose Build Housing (PBH).
- Addressing development delays and getting market developments on track.

Thank you for your continued support and attention to this challenging crisis. We are and will continue to be committed community partners.

Sincerely,



Shakiba Shayani, President & CEO, Guelph Chamber of Commerce  
On behalf of the community housing coalition

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<sup>1</sup> The examples are [numerous: encampments](#), development [delays](#), lack of affordable and [market supply](#); pressure on [downtown businesses](#); and [here](#), [here](#), [here](#), [here](#), [here](#), [here](#), [here](#), etc.

**Context: creating a plan of action and collaborating on its implementation**

On July 5th the [agenda](#) for the Housing Orientation and Education Workshop was posted to the City of Guelph website along with a presentation deck. Upon reviewing the deck we believe that there may be a number of questions that Council and the community would want to ask about.

1. Is there a specific plan for addressing the housing crisis?
2. How do we know if that plan is on track or not?
3. Who is responsible for making progress on the plan?
4. How are we adapting to this complex crisis and doing business differently?
5. How can we help?

The slide deck contains a lot of information which makes it difficult to parse out a coherent plan around the housing crisis (a plan in the sense of a detailed proposal for achieving outcome(s)). Put another way, it is difficult to connect the dots between the extensive list of activities and spending and specific outcomes within a discernable plan of action. The slide deck points to the complicated landscape in which the crisis is located including the challenges, gaps and overlapping jurisdictional responsibilities. And yet, the slide deck also points to an extraordinary task - that of doubling the historical rate of housing unit construction every year for the next 8 years as well to the compounding challenges of homelessness and associated mental health and addiction. In addition, the slide deck information highlights the systemic challenges that have and continue to impede rapid and sustained progress on this complex crisis. By its very definition, addressing the complex crisis will require new approaches, new or redeployed resources, and many difficult choices.

We believe that this is precisely why the City of Guelph and Council in particular are uniquely positioned to take on the political leadership required to make real progress on addressing the crisis. From our perspective a plan would necessarily include:

- A clear articulation of what we are trying to achieve, in this case:
  - 18,000 new housing units by 2031, with an identified percentage of those new units being “affordable”; and,
  - addressing the immediate and longer-term challenges of homelessness in the city.
- A clear articulation of *how* we are collectively going to make this happen, including who does what. That means identifying those levers for action that are inside of City control and those that are outside of City control.
  - For those levers within the City - what is the status of progress (or lack thereof) and what happens next.
  - For those levers outside the City - what is the engagement and advocacy plan including clarity of what’s needed and being requested. This would also require identifying who does what.
- A commitment to continued engagement and reporting on the progress and status of the plan.
- Ensuring that someone is responsible for making progress on the plan; for example, when the Refugee sponsorship forum undertook the settlement of 50 Syrian refugee families a [point person](#) was put in place to have responsibility and accountability for making the settlement plan happen - to undertake action including engaging the community, public officials and all levels of government. The audacity of the plan and the success generated by the right talent and resources in place to make it happen put Guelph on the international map.

**Recommendations**

<ul style="list-style-type: none"><li>● Articulate a clear plan of action with defined roles and responsibilities for addressing the housing crisis that builds on the significant work of City and County officials to date; communicate the plan in a way that is understandable and accessible to the public and report on progress regularly.</li><li>● Put a point person in place who will have the authority, responsibility and accountability for moving the plan of action forward.</li><li>● Develop a comprehensive engagement and advocacy plan to support action plan implementation</li></ul>	<p>Lead</p> <ul style="list-style-type: none"><li>● City of Guelph (local plan)</li></ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"><li>● Community leaders (advocacy)</li><li>● Development community</li><li>● Gov’t Ontario &amp; Canada (policies and funding)</li></ul>
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## Emergency Housing

There are many people in our community who do not have a home. In fact, a number of changes in the community<sup>1</sup> over the past few weeks have compounded this humanitarian disaster - and it continues to unfold in real time. An immediate response is needed to address the crisis within the crisis. In addition, a longer-term and more permanent set of solutions is required to address this insidious and enduring crisis.

Several communities across Ontario (e.g., [Kitchener](#), [Waterloo](#), [Kingston](#)) have successfully constructed ‘outdoor shelter’ sites on municipal and/or private land as a safe and connected alternative to living rough. These shelter communities include small, furnished units equipped with electricity, heating, and cooling, and a main cabin with access to other essential amenities such as running water and washrooms. These outdoor shelter sites facilitate access to supports such as mental health and addictions services. The cost to build an outdoor shelter of 50 units is estimated to be approximately \$3.5 million.

Hotels have been used in our community to offer temporary accommodation to individuals experiencing homelessness. For example, the County of Wellington Department of Housing used hotels to provide temporary accommodation for the 34 individuals displaced by the March 13, 2023 fire on Wyndham Street North.

In the absence of indoor and outdoor shelter spaces to accommodate all people experiencing homelessness, individuals have the right to “cover themselves with the most rudimentary form of shelter while sleeping overnight in a public place.” Although outdoor living arrangements (e.g., ‘encampments’) may present health and security risks, disconnection from relationships and social services, and public backlash, some people will choose to live in these spaces irrespective of the availability of shelter. For many reasons, availability of traditional shelter beds does not equate with access (due to stigma, lack of real or perceived safety, and/or trespass orders).

Permanent supportive housing (PSH) is a significant part of the long-term solution for many individuals experiencing homelessness; it offers affordable housing with on-site health and social service supports. Guelph is a leader in PSH with three developments set to open by September 2023.

## Recommendations

<p>Immediate term:</p> <ul style="list-style-type: none"> <li>● Establish a working group to rapidly identify, assess and implement solutions suitable for our community.</li> <li>● Build an outdoor shelter in Guelph that includes a minimum of 50 units.</li> <li>● Negotiate long-term hotel accommodation for individuals or families where this option is necessary.</li> <li>● Where individuals elect to enact outdoor living arrangements, promote safety and security through policy and program initiatives.</li> <li>● Meet the remaining capital funding needs for permanent supportive housing projects through the Home for Good campaign.</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>● City of Guelph</li> <li>● County of Wellington</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>● Community leaders (advocacy)</li> <li>● Development community</li> <li>● Gov’t Ontario &amp; Canada (policies and funding)</li> </ul>
<p>Longer-term</p> <ul style="list-style-type: none"> <li>● Advocate to the Province of Ontario to secure funding to operate the permanent supportive housing developments in Guelph.</li> <li>● Undertake reform of the social service delivery system between the City and the county that can better meet the challenges of a growing and complex crisis in homelessness, mental health and addiction.</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>● City of Guelph</li> <li>● County of Wellington</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>● Community leaders (advocacy)</li> <li>● Development community</li> <li>● Gov’t Ontario &amp; Canada (policies and funding)</li> </ul>

<sup>1</sup> The sale of 90 Carden Street and subsequent agreements to end tenancy (‘cash for keys’) in June 2023 have presented immediate risks to the lives of 150-250 people living in the building. Immediate action is needed to secure access to safe, supported, and respectful housing alternatives.

**Fast-track affordable housing and rental supply developments (Purpose Built Housing – PBH)**

Like all challenges within the complex housing crisis the “affordability” element of the equation is equally daunting. Building and preserving the right mix of housing along the continuum is critical. That mix of “affordable” or Purpose Built Housing (PBH) encompasses supportive, deeply affordable and market based housing solutions.

Not-for profit solutions		For profit solutions	
Supportive PBH	Deeply affordable PBH	Market based PBH	

Currently, housing development targets and policy levers do not fully reflect different household incomes and compositions, nor do they account for external socioeconomic pressures, such as the rising cost of living. These challenges are further exacerbated by labour shortages and other economic pressures.

To help fill supply gaps, it will be critical to leverage the strengths of the private, public, and non-profit sectors to spur affordable housing development along the continuum. How and where can as a community prioritise rental construction to get the quickest impact on the local market? Like any priority we need to be clear about what the priorities are so that the limited available resources can be put towards those actions that matter the most right now.

Similar to the market housing environment (see below) the PBH landscape is operating in a difficult economic climate and decisions - whether NFP or for profit - are impacted by a dynamic between time, costs and economic sustainability/profitability. In order to accelerate and increase the scale of PBH activity we must find ways to address the challenges within this dynamic. This is a space where innovation and the application of different approaches to building, financial and ownership tools can accelerate construction and make a meaningful difference in the local rental and affordable conditions. We must acknowledge that there is no silver bullet that will solve this complex dynamic - rather a set of tools will be required.

In the immediate term, identifying key levers for more and faster construction of affordable PBH would necessarily look at a range of financial, policy and land-use tools to address the costs and timelines of building such as:

1. strategic use and deployment of municipal (or other government) owned lands - as identified in the July 11 slide deck.
2. incentives, tax breaks or deferrals and accelerated approval timelines for prioritized PBH projects
3. partner with post-secondary institutions to prioritize the acceleration of affordable student housing options with financial levers such as community improvement plans (CIPs),
4. exploring innovative solutions for maintaining PBH affordability such as holding second mortgages and leveraging Infrastructure Ontario capital for securing loans (see for example Habitat for Humanity (HfH) Guelph Wellington’s Cityview Village [project](#)).
5. recognizing and incorporating the relationship between density and construction efficiency as a core consideration for scaling PBH

Not all of the levers are in the control of municipal governments and therefore a mix of actions, advocacy and engagement will be required. In addition, key stakeholders and partners such as the University of Guelph, Conestoga College and Habitat for Humanity should be engaged with aligned interests and shared objectives.

**Recommendations**

<ul style="list-style-type: none"> <li>• Working group with City, CoW, and expert service providers like HforH and the UofG to rapidly identify, assess, deploy and scale PBH models</li> <li>• Identify any existing or emerging potential PBH projects and prioritize them for rapid approvals and possible incentive/breaks to scale development(s)</li> <li>• Work with private developers to identify and implement innovative options for incorporating PBH into new development projects</li> <li>• Undertake a shared education campaign to engage the public and change perceptions about enduring concerns around density and PBH</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>• City of Guelph</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>• Community leaders (advocacy)</li> <li>• UofG, Conestoga College</li> <li>• Habitat for Humanity</li> <li>• Private developers</li> </ul>
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**Fast-tracking Market Housing supply:  
enhanced transparency, continuous process improvements and better working relationships.**

Creating more affordable housing and increasing the supply of rental housing in Guelph must be a priority. How and where can the City prioritize construction to get the quickest impact on the local market? How can we determine if policies and regulations are working as intended? The building of market-based housing is contingent on a number of predictive factors, the most important being time, revenue and cost.

These elements interact in a complicated dynamic that are often referred to as the pro forma calculation used to plan for new projects by developers - taken together they determine the conditions as to whether projects proceed or not. These assumptions are impacted by conditions that are largely external - interest rates, global market conditions, and economic shocks. Development businesses must plan and manage known risks. Current conditions are challenging - and development companies are contending with a myriad of risks and uncertainties.

**Historical Discounted 5-year Mortgage Rates**



Inside of this context the City of Guelph has made a pledge to build 18,000 new housing units by 2031 - such an effort is unprecedented and will require the City and the developers to build at about double the best historical levels. Doing this differently for City staff will require a rebalancing of risk and progress; for developers this will mean a greater willingness to work with staff and other stakeholders more collaboratively. We recognize this will be challenging - but we know this can be done.

The good news is that Guelph is doing better with increased construction numbers in a number of housing categories; the bad news is that there is still a long way to go in order to meet the housing pledge.

**Housing Starts by Dwelling Type**

	May-23	Chg	YTD	Chg
Single	6	↓	26	↓
Semi-detached	0	↔	6	↑
Row	5	↓	5	↓
Apartment	0	↔	596	↑
<b>Total</b>	<b>11</b>	<b>↓</b>	<b>633</b>	<b>↑</b>

**Notes:**  
Arrows: indicate the variation from the same period last year  
YTD: sum of housing starts between January and this month  
Source: [CMHC Starts and Completion Survey](#)

**Under Construction by Dwelling Type**

	May-23	Chg
Single	50	↓
Semi-detached	10	↓
Row	127	↑
Apartment	880	↑
<b>Total</b>	<b>1,067</b>	<b>↑</b>

**Notes:**  
Arrows: indicate the variation from the same period last year  
Source: [CMHC Starts and Completion Survey](#)

<b>Jan 2022-May 2023 (17 Mths - 14% of 10 Years) - Housing Units Under Construction and Completions</b>							
<b>Municipalities</b>	<b>10-Year Target</b>	<b>Completions</b>	<b>As a % of Target</b>	<b>Under Construction</b>	<b>As a % of Target</b>	<b>Comp+Cons</b>	<b>As a % of Target</b>
Kingston CY	8,000	1,751	21.9%	1,017	12.7%	2,768	34.6%
Toronto C	285,000	25,517	9.0%	59,561	20.9%	85,078	29.9%
Vaughan CY	42,000	2,335	5.6%	8,819	21.0%	11,154	26.6%
Pickering CY	13,000	868	6.7%	2,551	19.6%	3,419	26.3%
Brantford CY	10,000	1,314	13.1%	1,188	11.9%	2,502	25.0%
Niagara Falls CY	8,000	1,057	13.2%	763	9.5%	1,820	22.8%
Whitby T	18,000	1,818	10.1%	1,953	10.9%	3,771	21.0%
Kitchener CY	35,000	2,935	8.4%	4,309	12.3%	7,244	20.7%
Barrie CY	23,000	1,213	5.3%	3,434	14.9%	4,647	20.2%
Hamilton C	47,000	3,620	7.7%	5,403	11.5%	9,023	19.2%
Waterloo CY	16,000	1,377	8.6%	1,675	10.5%	3,052	19.1%
London CY	47,000	3,047	6.5%	5,582	11.9%	8,629	18.4%
Oshawa CY	23,000	1,832	8.0%	2,244	9.8%	4,076	17.7%
Oakville T	33,000	1,573	4.8%	4,107	12.4%	5,680	17.2%
Ottawa CV	151,000	10,812	7.2%	15,100	10.0%	25,912	17.2%
Markham CY	44,000	2,320	5.3%	4,876	11.1%	7,196	16.4%
Richmond Hill T	27,000	1,433	5.3%	2,815	10.4%	4,248	15.7%
Caledon T	13,000	1,014	7.8%	752	5.8%	1,766	13.6%
Cambridge CY	19,000	1,141	6.0%	1,167	6.1%	2,308	12.1%
Clarington MU	13,000	815	6.3%	697	5.4%	1,512	11.6%
St. Catharines CY	11,000	543	4.9%	662	6.0%	1,205	11.0%
Mississauga CY	120,000	2,035	1.7%	11,069	9.2%	13,104	10.9%
Milton T	21,000	957	4.6%	1,147	5.5%	2,104	10.0%
Guelph CY	18,000	548	3.0%	1,014	5.6%	1,562	8.7%
Windsor CY	13,000	487	3.7%	638	4.9%	1,125	8.7%
Newmarket T	12,000	269	2.2%	686	5.7%	955	8.0%
Ajax T	17,000	394	2.3%	676	4.0%	1,070	6.3%
Brampton CY	113,000	3,262	2.9%	2,879	2.5%	6,141	5.4%
Burlington CY	29,000	333	1.1%	951	3.3%	1,284	4.4%
<b>TOTAL</b>	<b>1,229,000</b>	<b>76,620</b>	<b>6.2%</b>	<b>147,735</b>	<b>12.0%</b>	<b>224,355</b>	<b>18.3%</b>

While many of the factors affecting building housing units are outside of our collective control we are not powerless and we offer the following considerations and recommendations as tangible actions towards needed progress.

### **Time considerations - process efficiency and more effective working relationships**

Time considerations can be characterized as both the absolute length of time required to get through planning and construction as well as the unpredictability of time (i.e., not knowing how long different aspects of a project will take). Currently in the city of Guelph time is a challenge. In absolute time terms we know that planning processes often take too long, and work is being undertaken to shorten those timelines. We applaud recent staff recommendations to proceed with the Delegation of Authority for Minor Zoning By-law Amendments to overcome this, as an example. These kinds of reforms will make a difference and there is much more that we can do. To support more effective engagements, it would be beneficial to create a process tracking and reporting dashboard<sup>2</sup> that would create transparency and accountability for all involved parties - this would create insights into systemic issues both within city hall and the development industry. Key metrics to track would include status of projects, time for approval or requests for revision/resubmission of applications, time required between initiation of projects and their completion.

We also believe that it would be useful to make the current list of “6000 approved units” public to analyze where these projects are in the development process and determine how to move these projects forward. While Guelph

<sup>2</sup> See for example the City of Toronto [Application Information Centre](#) dashboard generator and the City of Toronto Development Pipeline [report](#).

does have an approved official plan (OP) and zoning by-laws providing high-level direction for development projects, there are several additional steps required to move projects forward; from site plans, to permit approvals and a myriad of other minor variances that are inevitable particularly for large and complex projects.

A significant barrier to progress at the moment is the relationship between the development community, City staff and Council. This needs to be addressed. As mentioned, creating more transparency, and dealing more openly with the “6000 approved units” will be meaningful improvements. In addition, we believe that the developer appeal of the City’s comprehensive zoning by-law *in its entirety* is an immediate barrier to continued progress on building new housing units. To that end we believe that there is scope for both sides of this debate to come together “without prejudice” and discuss alternative solutions - in whole or in part - to the real and substantive issues from both sides. Waiting for the legal process currently underway with the OLT is creating undeserved delays and distractions.

Finally, many other aspects of successful and timely project completions remain outside of the City or developer control. To that end, clear priorities for other levels of government require and would be served by a collective advocacy plan with shared priorities that can and should emerge from a more data driven and effective working relationship between city officials, council, industry, and other stakeholders. Creating a shared advocacy plan is another critical and straightforward immediate term activity.

**Recommendations**

<ul style="list-style-type: none"> <li>● Encourage - in whole or in part - a negotiated revision to the appeal of Guelph’s comprehensive zoning by-law.</li> <li>● Make the list of “6000 approved units” publicly available in order to analyze and solve delay issues; and apply learnings more broadly to continue process efficiency improvements.</li> <li>● Implement a transparent reporting dashboard on projects within the development approval process.</li> <li>● Supporting advocacy plan for provincial and federal governments</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>● City of Guelph (local plan)</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>● Community leaders (advocacy)</li> <li>● Development community</li> <li>● Gov’t Ontario &amp; Canada (policies and funding)</li> </ul>
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## Compilation of Recommendations

Priority area	Recommendations	Responsible government(s), stakeholders and partners
Creating a plan of action with authority, responsibility, and accountability for implementation	<ul style="list-style-type: none"> <li>Articulate a clear plan of action with defined roles and responsibilities for addressing the housing crisis that builds on the significant work of City and County officials to date; communicate the plan in a way that is understandable and accessible to the public and report on progress regularly.</li> <li>Put a point person in place who will have the authority, responsibility, and accountability for moving the plan of action forward.</li> <li>Develop a comprehensive engagement and advocacy plan to support action plan implementation.</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>City of Guelph (local plan)</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>Community leaders (advocacy)</li> <li>Development community</li> <li>Gov't Ontario &amp; Canada (policies and funding)</li> </ul>
Emergency Housing	<p>Immediate term:</p> <ul style="list-style-type: none"> <li>Establish a working group to rapidly identify, assess and implement solutions suitable for our community.</li> <li>Build an outdoor shelter in Guelph that includes a minimum of 50 units.</li> <li>Negotiate long-term hotel accommodation for individuals and families where this deemed as necessary.</li> <li>Where individuals elect to enact outdoor living arrangements, promote safety and security through policy and program initiatives.</li> <li>Meet the remaining capital funding needs for permanent supportive housing projects through the Home for Good campaign.</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>City of Guelph</li> <li>County of Wellington</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>Community leaders (advocacy)</li> <li>Development community</li> <li>Gov't Ontario &amp; Canada (policies and funding)</li> </ul>
	<p>Longer-term</p> <ul style="list-style-type: none"> <li>Advocate to the Province of Ontario to secure funding to operate the permanent supportive housing developments in Guelph.</li> <li>Undertake reform of the social service delivery system between the City and the county that can better meet the challenges of a growing and complex crisis in homelessness, mental health and addiction.</li> <li>Accelerate the implementation of the OHT prioritizing housing related initiatives and integrate with broader housing initiatives.</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>City of Guelph</li> <li>County of Wellington</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>Community leaders (advocacy)</li> <li>Development community</li> <li>Gov't Ontario &amp; Canada (policies and funding)</li> </ul>
Accelerate affordable housing and rental supply developments (Purpose Built Rental Housing)	<ul style="list-style-type: none"> <li>Working group with City, CoW, and expert service providers like HforH and the UofG to rapidly identify, assess, deploy and scale PBH models, including the use of financial incentives such as CIP,</li> <li>Identify any existing or emerging potential PBH projects and prioritize them for rapid approvals and possible incentive/breaks to scale development(s)</li> <li>Work with private developers to identify and implement innovative options for incorporating PBH into new development projects.</li> <li>Undertake a shared education campaign to engage the public and change perceptions about enduring concerns around density and PBH.</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>City of Guelph</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>Community leaders (advocacy)</li> <li>UofG, Conestoga College</li> <li>Habitat for Humanity</li> <li>Private developers</li> </ul>
Fast-tracking Market Housing supply – enhanced transparency, continuous process improvements and better working relationships.	<ul style="list-style-type: none"> <li>Encourage - in whole or in part - a negotiated revision to the appeal of Guelph's comprehensive zoning by-law.</li> <li>Make the list of "6000 approved units" publicly available in order to analyze and solve delay issues; and apply learnings more broadly to continue process efficiency improvements.</li> <li>Implement a transparent reporting dashboard on projects within the development approval process.</li> <li>Supporting advocacy plan for provincial and federal governments</li> </ul>	<p>Lead</p> <ul style="list-style-type: none"> <li>City of Guelph (local plan)</li> </ul> <p>Stakeholders and partners</p> <ul style="list-style-type: none"> <li>Community leaders (advocacy)</li> <li>Development community</li> <li>Gov't Ontario &amp; Canada (policies and funding)</li> </ul>