

An aerial photograph of Park County, Montana, showing a town, a river, and mountains. The town is in the foreground, with a river winding through it. The mountains are in the background, with some snow on the peaks. The sky is blue with some clouds.

2022 HOUSING ACTION PLAN

PARK COUNTY, MONTANA



PARK COUNTY
HOUSING COALITION

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INTRODUCTION

The non-regulatory Park County housing action plan (HAP), finalized in early 2022, aims to define clear goals, strategies, policies, priorities, and responsible parties for implementation to create and preserve homes affordable to Park County, Montana, residents. The plan will define a mechanism to monitor progress and priorities. This plan was developed to reflect the values of a wide variety of community stakeholders from Park County, including residents, nonprofits, governmental, and business partners, in a process facilitated by the Human Resource Development Council of District IX.

The plan is an outcome of the Park County Housing Coalition (PCHC), a community-based collaborative effort to increase opportunities for Park County residents to access housing where they can afford to live and thrive.

Acknowledging the limited housing resources within the region, nonprofit organizations came together to build capacity around this top community priority. In 2020, in partnership with Park County Community Foundation (PCCF), HRDC re-convened the Park County Housing Coalition (PCHC) to expand on 2017-2018 work convened by the Park County Extension office of Montana State University.

In 2021, HRDC facilitated a dedicated subcommittee of the PCHC to guide the development of this HAP — the housing working group. As the local community action agency serving southwest Montana since 1975, HRDC's community development team brought decades of experience and technical expertise to steer this conversation. The facilitation team leveraged the existing resources available on LocalHousingSolutions.org, a digital housing policy platform intended to assist communities in developing, implementing, and monitoring local housing solutions while educating the community and shaping the framework of the HAP.

Going forward, the PCHC will continue to collaborate across organizations and municipalities to focus efforts on implementing this HAP and fulfilling the mission.

In addition to this HAP, the PCHC released the 2021 Park County housing needs assessment (HNA) in October 2021 as a companion document to provide data and insight into this HAP's recommendations.

AFFORDABLE HOUSING OR “HOMES RESIDENTS CAN AFFORD”

Affordable housing is relative to household income. This assessment uses the standard of the monthly rent or mortgage payment being equal to or less than 30% of gross household income (before taxes) for renters towards contract rent and utilities and 33% of gross income towards the mortgage, insurance, taxes, utilities, and condominium association fees if applicable for owners.

AMERICAN COMMUNITY SURVEY (ACS)

The ACS is part of the Decennial Census Program of the US Census. The survey was fully implemented in 2005, replacing the decennial census long-form, and has been administered annually since. Typically, ACS data for localities represent the aggregate results of five years of responses; for example, the 2019 ACS cited in this report reflects data collected between 2015 and 2019. Because it is based on a sample of responses, its use in smaller areas (under 65,000 persons) is best suited for monitoring general changes over time rather than for precise estimates due to margins of error.

AREA MEDIAN INCOME (AMI)

The AMI is a Housing and Urban Development (HUD) calculation of the midpoint of a region's household income distribution. This metric is a common tool for setting household income limits in affordable housing programs.

COMMUNITY LAND TRUST (CLT)

A CLT is a community-based organization established to serve as the long-term steward of the land and to protect long-term affordability and access to housing for the community.

COORDINATED ENTRY SYSTEM (CES)

CES was developed by HUD through the Continuum of Care (CoC) program to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

COST-BURDENED

When housing costs exceed 30% of a household's gross (pre-tax) income. Housing costs include rent or mortgage and may or may not include utilities, homeowner association fees, transportation, or other necessary costs depending upon its application.

DEED RESTRICTIONS

A covenant that imposes requirements for land use that sets restrictions for tenant or owner eligibility standards and/ or ensures long-term affordability.

HOUSING CHOICE VOUCHER

The housing choice voucher program (also referred to as Section 8 Housing Choice Vouchers) is the federal government's largest rental assistance program for assisting very low-income families, the elderly, and people with disabilities to afford decent, safe, and sanitary housing in the private market. Since housing assistance through the housing choice voucher program is provided on behalf of a family or individual directly to the owner of a rental unit of their choice, participants can find their own housing, including single-family homes, townhouses, and apartments.

LOW-INCOME HOUSING TAX CREDIT (LIHTC)

The LIHTC is the largest federal subsidy program for the development of affordable rental housing through new construction and substantial rehabilitation. Generally allocated by state housing finance agencies, it subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants.

MARKET RATE

Housing with no restrictions; property owners or sellers are free to set prices.

RESIDENT-OWNED COOPERATIVE (ROC)

In resident-owned manufactured housing communities, the lot rent goes to the resident cooperative and is managed to meet community needs and maintain affordability. NeighborWorks Montana provides the ROC program in Montana as part of the ROC USA® Network and works with local partners to create and preserve ROCs.

RENT-RESTRICTED HOUSING

A kind of low or moderate-income housing that rents below market to households earning a certain percentage of the AMI.

SHORT-TERM RENTAL (STR)

STRs in Montana are defined as a unit with a rental period of fewer than 30 consecutive days.

SUBSIDIZED HOUSING

A kind of low-income housing where a qualified tenant pays a fixed share of their income towards rent. These subsidies are typically provided by federal programs funded by HUD or USDA Rural Development.

SUPPORTIVE HOUSING (SH)

SH is an evidence-based intervention for chronic homelessness that offers affordable non-time-limited housing with optional, flexible support services.

TEMPORARY VS. CHRONIC HOMELESSNESS

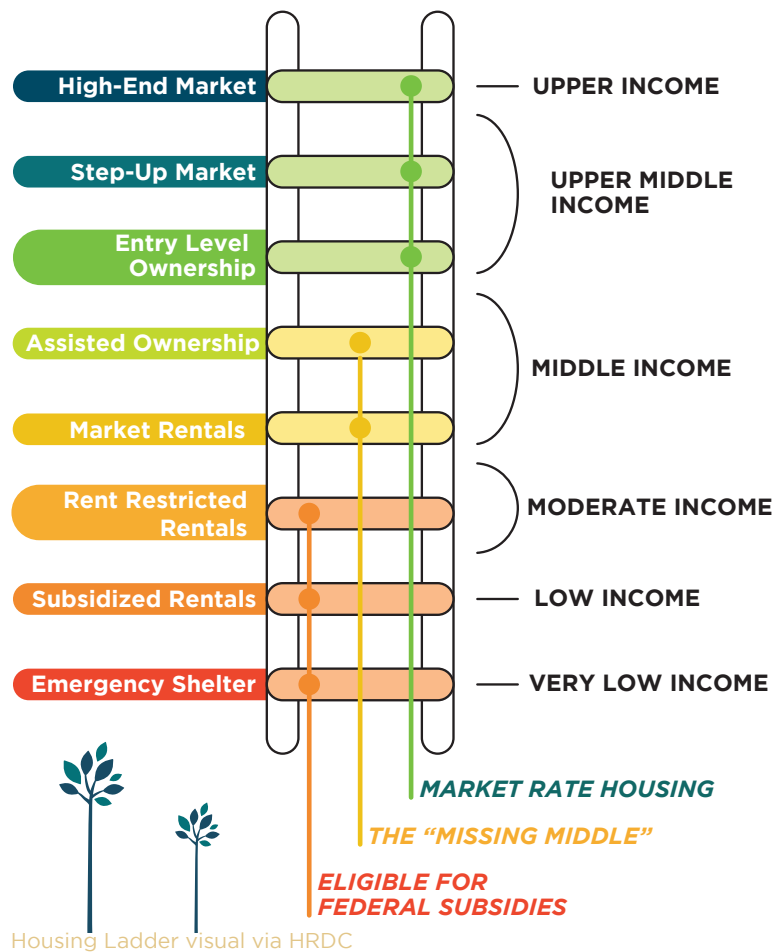
Chronic homelessness as defined by HUD describes the situation where people who have continually experienced homelessness for at least a year, or have experienced four episodes of homelessness over the past three years while struggling with a disabling condition such as a serious mental illness, substance use disorder, or physical disabilities. In contrast, temporary homelessness refers to an individual or family who lacks a fixed, regular, and adequate nighttime residence, such as those living in emergency shelters, transitional housing, or places not meant for habitation, but are doing so on a temporary basis.

WORKFORCE HOUSING

A broad term typically used for housing for employees earning local wages and may or may not include housing for rent or sale below market rates.

Increasing access to homes affordable to people who live or work in Park County is a top priority of residents, local governments, businesses, and nonprofit partners. The current market conditions do not provide enough opportunities for rent or ownership to meet current or future housing needs.

While various factors impact a household’s ability to secure affordable, safe, and stable housing, affordability is relative to a household’s income. The 2021 housing needs assessment found that rental households with incomes below \$50,000 a year faced the most challenges while households earning less than \$100,000 a year faced the most challenges purchasing homes. Since 2021, preliminary data shows needs continue to increase along the housing continuum, causing more downward pressure on households with lower incomes. In a housing market with reduced options, the “rungs of the ladder” shown in the graphic below become further apart.



As of 2021, the 7,774 households in Park County faced challenges along the housing continuum. Park County had 910 households with annual incomes of less than \$14,999, while only 221 homes in the County have rental subsidies attached to ensure monthly rent is affordable to households in this income range. Meanwhile, the year-to-date median single-family home sales price in Park County was \$440,750, as of December 2021.

Only an approximate one-in-five, or 1,572 households, in Park County earn incomes above \$100,000 a year, enough to support a mortgage for the median single-family for sale home.

In addition to affordability challenges, the 2021 HNA highlights a mismatch of household sizes and available homes. There are 1.65 single-person households for every studio or one-bedroom home in the County, with more small households than homes. This creates a more acute shortage of homes for single-person households.

There are several barriers to increasing the number of homes to meet the community's price point needs. Like many amenity-rich areas in Montana, Park County has experienced sharp increases in demand from out of state purchasers seeking first or second homes, along with increased pressure from people seeking a more affordable alternative to neighboring Gallatin County. These populations may have equity from more costly locations or the ability to work remotely and earn wages in excess of typical local wages, increasing their willingness and ability to pay increasing rents and sales prices. The HNA reported 2021 construction costs between \$180-\$200 per square foot for basic new residential construction, a function of both material cost escalation and a shortage of local labor. There is also limited available land with existing infrastructure, and just over half of land in Park County is federally managed by federal entities such as the forest service and parks.

Many local regulatory challenges exist, restricting local governments' ability to require, incentivize, or fund housing affordable to residents. There are opportunities for funding affordable housing in other states that are not currently available in Montana. The State of Montana has regulations preventing rent control, as well as luxury, second home, and real estate transfer taxes. The state also has property tax increase protections and a recent prohibition of inclusionary zoning.

For a detailed snapshot of Park County's housing needs as of mid-2021, please review the [2021 Park County housing needs assessment](#).



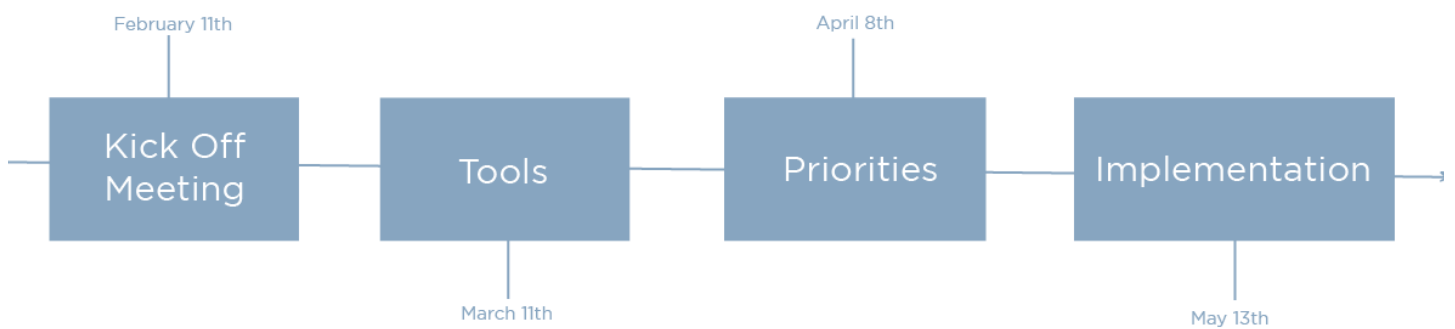
A draft of this plan was released to the public in October 2021, supported by the 2021 HNA. The public review occurred through a variety of outreach methods, detailed below, over four months between October 2021 and February 2022. Due to the COVID-19 pandemic, most of the public engagement occurred through online platforms.

This plan is an outcome of the work of the Park County housing coalition, beginning in 2020 with the re-convening and six-part webinar series to allow for a deeper community discussion and understanding around housing topics. Each online conversation attracted approximately 25 to 40 community members and featured a combination of local and regional experts to share current insight. The topic and timeline of each of the six sessions are below:

- Relaunching the Park County Housing Coalition (May 2020)
- Park County rental opportunities (June 2020)
- Park County homeownership opportunities (July 2020)
- Housing insecurity in Park County (August 2020)
- Assessments and strategies (September 2020)
- Next steps to develop the housing action plan (October 2020)

To create this HAP, a subcommittee was formed through an application process that occurred between November 2020 and January 2021. The housing working group represents a diversity of geographic range, lived experience, community leadership, and perspectives on housing challenges in Park County. Fourteen members participated in the housing working group.

The meetings for the housing working group included the following focus and timelines.



HRDC Community Development staff led the housing working group meetings. Through this process, HRDC produced the draft HAP in October 2021. The steps below occurred from October 2021 to February 2022.



Opportunities to comment on the plan were hosted on HRDC’s website or received via email and in writing. The plan received over 50 written survey responses, direct emails, and comments from individuals and organizations that have been incorporated into this final draft, excluding discussion during public events. Responses included feedback on the proposed tools and suggestions for additional partners as well as confirmed that residents are “very concerned” about housing opportunities for community members in Park County. Survey responses are available by contacting HRDC’s community development department.

The opportunity for engagement was publicly noticed in the Gardiner community newsletter, the Livingston Enterprise, and through partner listservs. Engagement opportunities were further supplemented by a series of three webinar events in partnership with the Park County Environmental Council that attracted 142 unique participants. The first part of this series featured a presentation and overview of the draft plan available online through the open comment period. The two additional community conversations welcomed regional experts to discuss some of the policy proposals in this HAP, including the Community Land Trust model and a discussion on short-term rentals. A draft of the plan was also presented publicly to the Park County planning board and the City of Livingston planning board with additional public comment received.

This process is consistent with the **2017 Park County Growth policy goals.**

Goal 6: Encourage efforts of non-governmental partners to address community needs.

Objective 6.1: Facilitate and provide support to community groups. Community groups and non-profits and other Non-Governmental Organizations (NGOs) often fill public service roles the governing body cannot cover. Economic development corporations, aging services and housing services are just a few examples. Park County has numerous existing relationships with community groups and will likely continue to have more in the future.

-Park County Growth Policy, page 14

Housing working group members established a set of core guiding principles to guide the values and priorities of the HAP in the spring of 2021.

1. Residents deserve safe, stable, and accessible homes that are affordable to households earning local wages and within reasonable proximity to school, work, and essential services.
2. Community and individual resident health depend upon having an adequate supply of homes available to residents of various incomes, ages, and household sizes, recognizing the entire community benefits from abundant housing availability, future economic growth, prosperity.
3. The solutions to providing affordable housing should involve diverse approaches, partnerships, and strategies — there is no one solution.
4. A sense of place should be supported by promoting vibrant communities.
5. Housing options should meet the needs of the current and future generations while preserving the natural landscapes.

In addition to the guiding principles above, this plan supports the values outlined in the 2017 Park County Growth Policy, including Chapter Six Key Issue: Housing, and the 2021 City of Livingston Growth policy, including Chapter Five: Housing.



This HAP aims to address challenges along the housing continuum with a balanced set of tools and strategies that are based on community engagement and local resources and are appropriate to the needs of Park County and its residents. To organize this HAP, HRDC utilized tools including the framework for a balanced strategy from LocalHousingSolutions.org, a digital housing policy platform intended to assist communities in developing, implementing, and monitoring local housing solutions. We encourage stakeholders interested in learning more about the tools and framework to visit their website.

Housing to meet community needs must accommodate a wide range of incomes, including households on fixed incomes, entry-level wage earners, and professionals. Housing also needs to consider the various life stages of community members, from households with elderly members seeking to downsize to those with young children.

A BALANCED APPROACH

This section frames each priority, existing and future consideration tools in the context of the localhousingsolutions.org balanced framework to show how a multi-pronged approach will address housing from all angles. As a community plan, it is important to have diversity in housing tools and implementing organizations. Both priority tools for the future and existing local tools and resources have been considered in the framework below.



INDICATES AN ESTABLISHED TOOL



INDICATES AN ESTABLISHED TOOL THAT WOULD BENEFIT FROM EXPANSION



INDICATES A NEW PRIORITY TOOL

GOAL: CREATE AND PRESERVE AFFORDABLE HOUSING

There are ten tools identified as a top priority in this section.

1. Strategy: Establishing incentives or requirements for affordable housing

- Short-term rental management
- Density Bonus
- Flexible development standards
 - Expedited plan review
 - Parking reduction

3. Strategy: Supporting affordable housing through subsidies

- Low-Income Housing Tax Credits (LIHTC)

4. Strategy: Preserving existing affordable housing

- Rehabilitation Loans and Grants
 - Right of first refusal

5. Strategy: Creating durable affordable homeownership opportunities

- ROC (Resident-Owned Communities)
- Community Land Trust

2. Strategy: Generating revenue for affordable housing

- Employer Assisted Housing/Partnerships
 - Local Option Resort Tax
 - Mill Levy
 - Commercial linkage
 - Tax Increment Finance District

6. Strategy: Facilitating the acquisition or identification of land for affordable housing

- Land banking
 - Use of publicly owned property for affordable housing



INDICATES AN ESTABLISHED TOOL



INDICATES AN ESTABLISHED TOOL THAT
WOULD BENEFIT FROM EXPANSION



INDICATES A NEW PRIORITY TOOL

GOAL: ALIGN HOUSING SUPPLY WITH MARKET AND NEIGHBORHOOD HOUSING CONDITIONS

There are two tools identified as a top priority in this section.

1. Strategy: Planning

- **General zoning reform**

2. Strategy: Reduce development costs

- **Increasing Accessory Dwelling units**

GOAL: HELP HOUSEHOLDS ACCESS AND AFFORD PRIVATE MARKET HOMES

There are two tools identified as a top priority in this section.

1. Strategy: Providing tenant-based rental assistance

- Existing programs available to Park County residents Housing choice vouchers and HOME tenant-based rental assistance

- Coordinated Entry System (CES)

- Security deposit/ first month's rent assistance - not discussed yet possible program

2. Strategy: Reducing barriers to homeownership

- **Down Payment Assistance (DPA)**

- Housing education and counseling

3. Strategy: Reducing energy use and costs

- Combating housing discrimination

- Existing Ongoing Programs

- **Fair housing oversight programs from the Montana Board of Housing**

- **Tenant protection programs offered through Montana Legal Services Association**

4. Enhancing homeowners' housing stability

- **Property tax relief for income-qualified homeowners**

- **Foreclosure prevention programs Improving the quality of both new and existing housing**

- **Weatherization-Homeowner rehabilitation assistance programs including Low Income Energy Assistance Program (LIEAP)**

This section will look at each of the twelve tools recommended for prioritization by the Park County housing working group, a subcommittee of the Park County Housing Coalition. Each tool aims to increase access for Park County residents to homes that they can afford. The proposed housing tools take into account the current priorities, community needs, and existing resources available to meet the housing needs of residents in Park County.

In this section, you will find a brief description of the tool, why it was prioritized, and some examples of other communities that have utilized the tool. Some of the tools are new strategies for the community, while others provide recommendations for altering or expanding existing programs or policies.

The housing working group met four times with additional time spent on research and review of materials outside of meetings. The first meeting focused on our collaborative process and co-creating the guiding principles. During the three additional sessions, participants had opportunities to learn from housing policy experts about possible tools, share priorities and specifics on implementation. To ensure equal representation among all housing working group participants, the group also completed several surveys to assess group priorities, values, and opinions on implementation guidance. Tools were prioritized by a voting process, with the resulting rankings representing housing working group preferences.

- 1. Low-Income Housing Tax Credit (LIHTC)**
- 2. Employer Assisted Housing/Partnerships**
- 3. Resident-Owned Community Program (ROC)**
- 4. Community Land Trust (CLT)**
- 5. Density Bonus**
- 6. Land Banking**
- 7. Down Payment Assistance (DPA)**
- 8. Accessory Dwelling Units (ADUs)**
- 9. General Zoning Reform & Flexible Development Standard**
- 10. Rehabilitation Loans and Grants**
- 11. Short-Term Rental (STR) Management**
- 12. Coordinated Entry System (CES)**

1. LOW-INCOME HOUSING TAX CREDIT (LIHTC)

What is this tool? The Low-Income Housing Tax Credit (LIHTC) subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants. The federally funded LIHTC program is the largest resource for creating affordable housing nationally and is administered at the state housing finance agencies. Created by the Tax Reform Act of 1986, the LIHTC program gives state and local LIHTC-allocating agencies the equivalent of approximately \$8 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. There are two types of credits, the non-competitive 4%, and the competitive 9%. These credits can be sold to cover about 30% or 90% of eligible construction costs, respectively. Each year in Montana, about 5-6 LIHTC 9% awards are made by the Montana Department of Commerce.

Why was this tool prioritized? The housing working group selected the LIHTC program to address the urgent needs of low and moderate-income renters. Although 9% LIHTCs are a highly competitive process in the state of Montana, 4% LIHTCs may be more easily accessible for development because they are awarded by right for proposals that meet the qualifications. This tool's potential impact targets a demographic identified by community members as a top priority. The housing needs assessment found 70% of renters in Park County have an annual income of \$50,000 or less. The LIHTC income and rent chart indicate that the majority of renter households in Park County would qualify for this program.

Recommendation:

1. Seek out partnerships with affordable housing developers to encourage the use of LIHTC in Park County
2. Investigate opportunities to generate funding through public or private sources to cover the gap between total development costs and the funds that can be raised through LIHTC and debt supported by expected tenant rent contributions.

Recommended Geographic Implementation: Park County and City of Livingston

Existing examples in Livingston: Bluebunch Flats, Miles Building, and Sherwood Building.

Expected Impact: Create and preserve housing that is affordable to low- and moderate-income renters.

Impacted Players: Low-income renters and employers of low-wage workers.

2. EMPLOYER-ASSISTED HOUSING (EAH) PARTNERSHIPS

What is this tool? Employer-assisted housing (EAH) programs are efforts that engage employers as partners to expand the availability of housing affordable to their workers and others. EAH provides employers with a mechanism to invest in and create housing opportunities, including land acquisition, down-payment assistance, master leasing homes, or equity contributions to purchase affordable properties. It may be temporary, for relocation only, or long-term depending on the employer's needs. Employers also serve a critical role in creating partnerships and political will for broader solutions.

Why was this tool prioritized? Employers have identified affordable housing as a barrier to hiring and maintaining a consistent workforce; with a vested interest in addressing housing challenges in the community, employers have the opportunity to play a role in solutions. Housing working group members noted anecdotal existing local solutions that have the potential to be shared between employers. Members also expressed concerns about linking employment and housing opportunities too closely because of the potential downsides for both parties. The recommendation seeks to prioritize solutions that untether housing from jobs with a single employer and increase residents' access to all local job opportunities, promoting professional growth and stable communities, benefitting all employers.

Recommendation: Form a priority area subcommittee of the PCHC "Workforce Housing Challenges & Employer-Based Solutions" – Through the subcommittee, leverage local employer expertise and concern to share existing solutions that are already working in the community, discuss challenges facing employers regarding housing and discuss ways for employers to become involved in expanding the availability of affordable housing for their workers (and others) and how to scale solutions being implemented by peer communities that may work locally.

Recommended Geographic Implementation: All areas of Park County.

Examples: EAH may address supply through development of housing, financing, or donation of land or other investments towards housing or assisting employees to access housing through rent subsidies, DPA, education, deposit assistance, rent guarantee, or subleases. Employers can also supply land for the development of affordable housing or create a fund that would invest equity in affordable housing developments.

Expected Impact: The whole community benefits when there are homes available to workers.

Impacted Players: Employers and workers.

3. RESIDENT-OWNED COMMUNITY PROGRAM (ROC)

What is this tool? In resident-owned manufactured home communities, the lot rent goes to the resident cooperative and is managed to meet community needs and maintain affordability. The tool prevents escalating costs for residents, displacement, and loss of naturally occurring affordable homes to redevelopment. NeighborWorks Montana operates the ROC program in Montana as part of the ROC USA® Network, which includes over 250 across the nation and partners with local organizations to provide technical assistance to create ROCs.

Why was this tool prioritized? Naturally occurring affordable housing meets a critical need for Park County residents. Many manufactured homes, either rented or owned, provide residents with homes they can afford. In the City of Livingston, manufactured homes account for 3.6% of structures and 10.4% in the County for a total of 14% of structures or 1136 homes within Park County. While owners of manufactured homes on rented lots may have affordable payments, they do not have the protections associated with owning their lot. Without changes such as the ROC program, residents of mobile home parks are vulnerable to price increases or displacement of the entire community for redevelopment. With a limited supply of homes available to residents with low incomes, preserving and stabilizing mobile home parks can ensure residents are able to stay in their homes while adding economic benefits to new ROC owners.

Recommendation: Work with residents of existing manufactured housing communities in Park County to ensure they are aware of the benefits of ROCs and partner with NeighborWorks Montana to secure advice and financing for park residents that wish to purchase their parks and turn them into ROCs. Use the existing View Vista ROC as a model to increase awareness of ROCs in Park County as an alternative to selling for residents and owners.

Recommended Geographic Implementation: Park County, incorporated and unincorporated.

Examples: View Vista, or peer examples in Billings C&C Community Inc.

Expected Impact: Prevent displacement of low-income households from the preservation of naturally occurring affordable housing.

Impacted Players: Low-income households and employers of low-wage workers.

4. COMMUNITY LAND TRUST (CLT)

What is this tool? CLTs preserve affordable homeownership through the use of a ground lease. As a nonprofit steward of the land, the CLT will maintain ownership of the land beneath the home and sell the home for a reduced price to income-qualified homeowners. To maintain long-term affordability for future buyers, typically an annual appreciation cap and owner occupancy requirements are part of the terms of the ground lease. CLTs provide an opportunity for residents to purchase below market-rate homes to benefit from stable, affordable housing, and equity building while preserving these opportunities in perpetuity.

Why was this tool prioritized? The current for-sale market is not meeting the needs of low- and middle-income households. CLTs can help provide an in-between option from market rentals and market homes for sale while helping build stability for the community and families purchasing CLT homes.

Recommendation:

1. Educate potential buyers about existing opportunities to purchase a home in HRDC's Livingston Land Trust and share the community impact with decision makers and potential partners.
2. Seek out funding from public and private sources to help make homes affordable through CLTs.
3. Expand offerings of CLT homes through a partnership with existing CLT stewards, including HRDC, Habitat for Humanity, or Trust Montana.

Recommended Geographic Implementation: Park County and City of Livingston.

Local examples: Livingston Land Trust by HRDC, **Peer examples:** In Bozeman by HRDC, or in Red Lodge by Trust Montana in partnership with Habitat for Humanity.

Expected Impact: Create and preserve homes for ownership that are affordable to residents in perpetuity.

Impacted Players: Households with moderate incomes seeking homeownership, employers of moderate-income households that wish to retain employees in the community.

5. DENSITY BONUS

What is this tool? A density bonus can be used as an incentive for developers by allowing additional units per acre, Floor Area Ratio (FAR), or height for projects that meet community housing objectives. This exchange is typically 10 or 20 percent beyond the baseline allowed density.

Why was this tool prioritized? Specifically for the city of Livingston, areas of town have been identified through the Livingston Growth Policy as recommended for infill development. Creating a density bonus could incentivize the creation of more affordable housing.

Recommendation: Encourage the City of Livingston to access and implement a density bonus for developers that meet the needs of residents by providing units with long-term affordability commitments.

Recommended Geographic Implementation: City of Livingston.

Examples: City of Boise, ID Housing Bonus Ordinance., 2021 (Boise City Code Chapter 11-06-03.4)

Expected Impact: Increase the supply of homes in targeted areas of Livingston.

Impacted Players: Developers, renters, and owners.

6. LAND BANKING

What is this tool? Acquiring land for unspecified future community housing needs. Land can be donated, traded, or purchased.

Why was this tool prioritized? Although the needs of today are pressing, the communities in Park County are expected to continue growing. Housing working group members expressed a desire to plan for future growth intentionally.

Recommendation:

1. Identify land owned by public entities, institutional owners, or private donors that can be deed-restricted for future use as community housing.
2. Increase local capacity on land banking by leveraging technical assistance resources from organizations such as the Center for Community Progress or as a future subcommittee objective for the PCHC.

Recommended Geographic Implementation: Park County, especially targeting areas just outside of the city of Livingston located in the Extraterritorial jurisdiction.

Examples: The Northside Neighborhood Initiative & Land Bank in Chapel Hill, NC.

Expected Impact: Create future opportunities by facilitating land acquisition or identification.

Impacted Players: Future generations of Park County residents.

7. DOWN PAYMENT ASSISTANCE

What is this tool? Down payments or second mortgages for purchasing homes. It may be used for market rate or below-market priced homes. Programs are typically income-limited relative to the area median income (AMI), a benchmark released annually by the US Housing and Urban Development (HUD) for each county in the United States. Federal and state funds are typically limited to households earning less than 80% AMI; private financing may not have the same restrictions. There are currently active programs for down payment assistance in the region, including the HOME down payment program administered by the HRDC, the HomeNow program administered by MoFi, and various programs provided by NeighborWorks Montana and the Montana Board of Housing (MBOH).

Why was this tool prioritized? Down payment assistance can help first-time homebuyers access or afford homes in the market or income-restricted homes for sale, including households purchasing CLT homes. This tool was prioritized to meet the needs of locals facing challenges around coming up with a down payment or with addressing the gap between the mortgage they qualify for and housing prices of less than \$30,000 (the current maximum amount of assistance under the HOME program).

Recommendation:

1. Promote the existing programs offered through HRDC, MoFi, NeighborWorks, and MBOH for eligible first time home buyers.
2. PCHC, or partner organization, facilitates connections with developers selling moderately priced homes with home buyers to use existing down payment assistance programs.
3. Explore establishing a funding source for a new down payment assistance program that would serve middle income households not currently eligible for existing programs yet still priced out of the current market.

Recommended Geographic Implementation: All areas of Park County, including the city of Livingston.

Examples: City of Bozeman DPA program through a revolving loan fund to first time homebuyers

Expected Impact: Increase homeownership rate for middle-income households by helping households access and afford the private market and reducing barriers to homeownership.

Impacted Players: Middle-income first-time home buyers and employers of middle-income households.

8. ACCESSORY DWELLING UNITS (ADUS)

What is this tool? Accessory dwelling units (ADUs) are accessory apartments or secondary units (sometimes called granny flats). They serve as additional living quarters on single-family lots independent of the primary dwelling unit, either attached or detached to the primary dwelling. Due to their smaller size and location, ADUs have the potential to provide homes affordable to lower- and middle-income households while providing stability to existing homeowners. Programs to encourage accessory units to meet local housing needs, including various examples of incentives, education, and outreach, should be considered.

Why was this tool prioritized? The Livingston Growth Policy highlights infill development that complements existing neighborhood character while allowing for additional homes to provide for new neighbors of all income levels as well as support existing homeowners to maintain the affordability of their homes. The draft 2021 Gardiner Neighborhood plan also supports strategies to increase housing opportunities, especially for year-round residents. This tool could be used in communities with access to public water and wastewater services to increase density and dwelling units.

Recommendation:

1. Provide educational materials to the community to help potential ADU owners understand the existing ADU process, along with the technical capacity to assist with financing, obtaining approval, and project development.
2. Evaluate possible incentives or funding sources for developing new ADUs, including an incentive for ADUs with deed restrictions for long term rental with possible income restrictions.

Recommended Geographic Implementation: City of Livingston.

Examples: West Denver ADU program (West Denver Renaissance Collaborative) and ADU handbook.

Expected Impact: Increasing ADUs can provide more options for households of all sizes, benefitting both those living in ADUs and owners of ADUs from the additional rental income. ADUs can increase stability for families to provide more flexible living arrangements for changing family compositions.

Impacted Players: Homeowners, renters of a range of income levels, visitors.

9. GENERAL ZONING REFORM & FLEXIBLE DEVELOPMENT STANDARDS

What is this tool? Conducting a review and implementing changes to development standards through the lens of removing barriers to building a variety of housing choices, including the missing middle typology of homes such as duplexes, triplexes, garden-style apartments, and town homes. Re-legalizing homes of all shapes and sizes for people of all incomes can help preserve mixed-income neighborhoods while offering opportunities for residents to rent or own homes, including expanding options for starter homes for families.

A consideration for parking reduction should be included in the general zoning reform. A parking reduction removes barriers to construction, including cost and required space, increases access to housing at all levels, including low- and moderate-income. Scaling of incentives to meet deeper levels of affordability impacting lower-income residents may also be considered.

Changes “cut red tape”, such as by-right development policies, which ensure a more predictable and streamlined permitting and development process, reducing barriers and risk that may contribute to higher building costs. By-right development policies also reduce the potential impact of Not-In-My-Backyard (NIMBY) groups or individuals representing a minority of public opinion preventing new homes from becoming available for residents.

Why was this tool prioritized? For the city of Livingston, this strategy aligns with the Livingston Growth Policy and offers an opportunity to prioritize community values through the zoning code that offers incentives for building community housing.

Recommendation:

1. Conduct a code audit to assess zoning and development code barriers to expand housing opportunities in Livingston.
2. Implement changes to the current code to allow for more abundant housing.
3. Encourage the city of Livingston to conduct an assessment of the current parking requirements impact on housing and consider a parking reduction in exchange for meeting affordability requirements or increased density.
4. Align wastewater infrastructure investments to expand the developable land for future housing needs.

Recommended Geographic Implementation: the City of Livingston and the immediate surrounding areas.

Examples: The “Home In Tacoma Project” (2021)

Expected Impact: Remove barriers to development, increase the supply of homes, and increase developable land with community water and wastewater infrastructure.

Impacted Players: A community-wide impact would be expected from increasing the supply of homes.

10. REHABILITATION LOANS AND GRANTS

What is this tool? Grants typically from the state or federal level to improve existing housing in need of repair serving low-income households. This category covers a few types of programs; LIHTC rehabilitation loans can be used to update multifamily rental housing, while weatherization or Community Development Block Grant (CDBG) programs focus on life and safety updates to both renter- and owner-occupied homes of low-income households. Some rehabilitation programs are also funded with locally generated funds and cover home repairs for seniors and others.

Why was this tool prioritized? Many homes in Park County are older and in need of improvements. Promoting existing and expanding rehabilitation loans and weatherization programs, especially for those with low incomes or disabilities, can help residents stay in their homes, including older community members interested in aging in their homes.

Recommendation:

1. Include weatherization program information in the housing resources dashboard.
2. HRDC or another community partner expands capacity for home rehabilitation programs targeting low-income residents housed in private homes by applying for Community Development Block Grant (CDBG) Housing Stabilization funding through the Montana Department of Commerce.
3. Prioritize LIHTC acquisition/rehabilitation projects to preserve subsidized and rent-restricted units.

Recommended Geographic Implementation: All areas in Park County, including the city of Livingston.

Examples: Weatherization Assistance Program through the United States Department of Energy administered locally through HRDC, City of Helena home rehabilitation program, Big Sky Villas Rural Development 515 Preservation in Belgrade.

Expected Impact: Prevent vulnerable homeowners and renters from displacement or unsafe living conditions through critical preservation.

Impacted Players: Low-income renters and homeowners and employers.

11. SHORT-TERM RENTAL (STR) MANAGEMENT

What is this tool? Local policies, tracking, and enforcement on agreed-upon standards and use for STR. This may include expanded registration fees for STRs. The state of Montana defines short-term rentals as lasting fewer than 30 consecutive days. The scope of this HAP does not define the precise application of a short-term rental approach. However, the plan recommends continued data collection and partnerships between the city and county. The collected data can then be used to inform an in-depth community process to define and target a short-term rental policy that is values-driven and meets the stakeholders' goals.

Why was this tool prioritized? Based on information in the housing needs assessment (HNA), if a home is rented for the median price of \$243 a night for 15 days a month, the resulting gross revenue would be \$3,645, well above median rents. If a home is rented at the median price every day of the summer season (90 days), the gross revenue would be \$21,870. Community members and the housing working group advocated for a mechanism to benefit the broader community and address possible displacement by the continued growth of STRs. STRs benefit the community by allowing owners to generate income and adding value to the local tourism-based economy. In addition, STR management ensures the safety of visitors. The 2021 HNA reports an estimated 6.8% of homes in Park County are currently being used for short-term rentals.

Recommendation:

1. Work with the Park County Health Department to renew contract services to monitor, manage compliance, and collect fees for registered STRs. Share and expand data collection with the PCHC.
2. City of Livingston and Park County partner to create standards for STRs, including increasing the registration fee for STRs to cover administrative costs and consider a maximum percentage of dwelling units by the community. Any future consideration involving short-term rentals should include individuals that own and operate short-term rentals and include a robust public engagement process with diverse representation from across the County prior to any implementation.

Recommended Geographic Implementation: All areas of Park County, including the city of Livingston and the community of Gardiner.

Examples: City of Bozeman Short-Term Rental Ordinance, 2017 (Ordinance 1974); Whitefish, MT Short-Term Rental Ordinance, 2021 (11-3-35: SHORT-TERM RENTAL STANDARDS).

Expected Impact: Standards and fees on STRs are intended to balance the potential negative impacts of displacement with positive benefits to the community by generating revenue for an affordable housing fund. Targeting a maximum percentage of STRs per community would help maintain available homes for long-term residents.

Impacted Players: Tourism industries, renters, owners.

12. COORDINATED ENTRY SYSTEM (CES)

What is this tool? Coordinated Entry (CES) is a process developed by HUD through the Continuum of Care (CoC) program intended to prevent or remediate homelessness. CES aims to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred to and connected to housing and assistance based on their strengths and needs. Park County began using CES in 2021 with biweekly meetings of four local service providers: L'Esprit: certified mental health center, Community Health Partners: federally qualified health center, ASPEN: a nonprofit organization dedicated to serving victims and survivors of domestic and sexual violence, and the lead organization HRDC: a community action agency offering a range of programs, including homeless services and seasonal shelter.

Why was this tool prioritized? Following best practices for CES, the participation of Livingston Healthcare was identified as a gap in program implementation. As the community grows, CES will provide an efficient and impactful way to address the needs of unhoused residents.

Recommendation:

1. Expand CES partners in the healthcare industry, including Livingston Healthcare.
2. Continue to meet regularly and increase data collection to advocate for residents.

Recommended Geographic Implementation: Park County, including the city of Livingston.

Examples: Greater Helena Area Housing First Coordinated Entry System, many larger communities in Montana and the United States.

Expected Impact: Improve coordination between service providers to address the needs of unhoused residents and connect individuals to housing by providing tenant-based rental assistance and helping residents access private market rentals.

Impacted Players: Unhoused residents and community service providers.

AFFORDABLE HOUSING CONTINUUM: PARK COUNTY

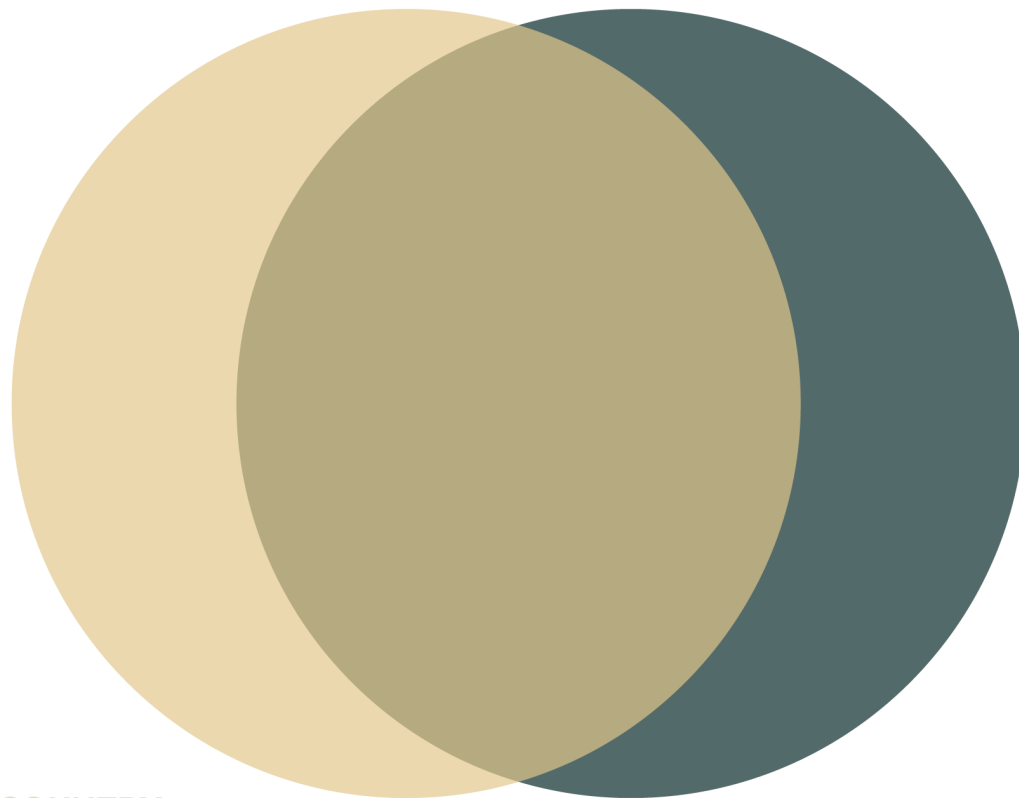
The chart below summarizes how the proposed priority tools would impact the housing needs of Park County residents and relevant partners for implementation.

Income	Less than 30% AMI \$0 - \$18,000	31% to 60% AMI \$18,000 - \$36,000	61%-90% AMI \$36,000- \$60,000	91%-120% AMI \$60,000- \$80,000	120% - 150% AMI \$80,000 - \$100,000	Over 150% AMI Over \$100,000
Total Household Rounded estimate based on HRDC staff analysis of INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) based on population 2019 the average household size is 2.07 persons ACS Survey/Program: American Community Survey TableID: S1901	13.18% 1,026 Households	20.20% 1,572 Households	21.46% 1,670 Households	13.18% 1,055 Households	11.41% 888 Households	20.20% 1,571 Households
What is Affordable? Based on 30% gross household income at the mid-point of this income range	\$225 per month	\$675 per month	\$1,200 per month	\$1,750 per month	\$2,250 per month	\$2,750+ per month
Strategies & Tools	renters	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Low Income Housing Tax Credit	owners	owners	owners	owners	owners	owners
Community Land Trust (CLT)	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Resident Owned Community Program (ROCC)	renters	renters	renters	renters	renters	renters
Density Bonus	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Accessory Dwelling Units	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Down Payment Assistance	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Employer Assisted Housing/Partnerships	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Rehabilitation Loans and Grants	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Short term Rental Regulation	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Land Banking	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
General Zoning Reform & Flexible Development Standards	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners	renters & owners
Coordinated Entry System (CES)	renters	renters	renters	renters	renters	renters
Partners	Service Providers	Property owners and rental agencies	Owners Nonprofit Developers and Community Land Trusts	For-Profit Affordable Housing Developers	For-Profit Affordable Housing Developers	For-Profit Developers

The following chart shows tools that have not been prioritized at this time but were discussed during the planning process with the housing working group. These tools may be appropriate for another time or specific area of Park County. They have not been prioritized at this time due to lack of precedence in peer communities, barriers to implementation, limited perceived impact, or tools deemed less likely to be accepted by residents. The twelve prioritized tools above aim to represent a balance of near-term priorities, acknowledging there are possibilities worth considering that have not been selected at this time. Housing working group members expressed a strong interest in focusing on increasing opportunities for households with more limited resources, including renters and owners.

TOOL OR PROGRAM	DEFINITION	WHEN TO PRIORITIZE AND EXPLORATORY STEPS	IMPACTED PLAYERS
<p>Commercial Linkage Goal: Create and preserve affordable housing Strategy: Generating revenue for affordable housing</p>	<p>Requirements for new commercial development to build, dedicate, donate, or pay for the creation of new housing directly related to the impact they are making in terms of new households to the housing market to provide housing for a portion of employees generated. Can be defined for community priorities.</p>	<p>Housing working group members did not advocate to prioritize this tool as a good fit for the communities of Park County. The employer round table should consider this tool highlighted as an outcome of the top tool, “employer-assisted housing.”</p>	<p>New businesses and potential residents of workforce housing.</p>
<p>Local Option Resort Tax Goal: Create and preserve affordable housing Strategy: Generating revenue for affordable housing</p>	<p>Legislative changes to levy a Resort Tax on specific tourism related activities in the area to fund housing and/or other community priorities.</p>	<p>Advocate for state approval of a Resort Tax District that would allow funding to be directed to community priorities including affordable housing. Local Option Resort Taxes are already in place in Gardiner and Cooke City. The resort tax board should consider allocating additional funding towards housing. Creating a resort tax in Livingston would require a legislative change at the state level.</p>	<p>Potential funds could be used to address a range of housing needs along the housing continuum.</p>
<p>Right of First Refusal programs Goal: Create and preserve affordable housing Strategy: Preserving existing affordable housing</p>	<p>Most often these programs require owners of affordable housing to notify the public sector of intent to sell or redevelop the property and allow a period of potential purchase by the public sector or nonprofit partner.</p>	<p>Housing working group members did not advocate to prioritize this tool as a good fit for the communities of Park County. We encourage local governments and nonprofits to monitor opportunities for the preservation of existing affordable housing with a focus on housing with subsidies.</p>	<p>Low-income renters at risk of displacement.</p>
<p>Tax Increment Financing (TIF) Goal: Create and preserve affordable housing Strategy: Generating revenue for affordable housing</p>	<p>A tool currently only available to incorporated areas in Montana that allows the allocation of taxes within a defined district towards priorities of that district.</p>	<p>The City of Livingston could consider this tool for a specific area intending to promote the development of homes in that area.</p>	<p>Businesses intending to hire low to moderate-income employees locally, low and moderate-income households.</p>

As the largest incorporated community in Park County, the city of Livingston will play an important role in the success of future housing work. The Park County housing coalition will continue to focus on implementation in 2022 and beyond. The PCHC intends to move forward with additional subcommittees to focus on near-term goals, PCHC sustainability, and access to funding to ensure the success of this HAP. We expect three subcommittees will kick off in 2022. The top focus areas have been identified by a prioritization exercise with the housing working group. They will focus on workforce housing, establishing local funding sources including a community fund, a local investment fund, or additional grant funding, and a focus on continued data collection and monitoring. Led by HRDC in 2022, each subcommittee will develop a scope of work and timeline to ensure efficient use of volunteers' time. A PCHC coordinator will be identified to continue monitoring the success of the plan and the coalition by 2023.



**PARK COUNTRY
PRIORITY TOOLS**

- Resident-owned cooperative
- Land Banking
- General Zoning Reform

PARTNERSHIP TOOLS

- Low Income Housing Tax Credit
- Community Land Trust
- Down Payment Assistance
- Employer Assisted Housing
- Short term rental regulations
- Coordinated Entry System
- STR Regulation
- Rehabilitation Loans and Grants

**CITY OF LIVINGSTON
PRIORITY TOOLS**

- Density Bonus
- ADU expansion
- General Zoning Reform and Flexible Development Standards

The PCHC website launched in 2022 will be built out to provide additional information, including:

1. Key housing market snapshot indicators, for example:
 - Median home prices in Livingston and Park County
 - Number of permanently affordable homes under ownership (income restricted)
 - Average rent in Livingston and Park County
 - Number of HUD housing choice vouchers active in Park County
 - Number of subsidized and rent-restricted housing units
 - Rental vacancy rates
 - Status of housing funding sources
 - Average household income and associated affordable housing costs
 - Average household size
 - Percent of population housing cost-burdened, by race

2. Progress of HAP implementation, for example:
 - Number of homes created
 - Number of bedrooms created
 - Number of homes preserved
 - Number of bedrooms preserved
 - Number of new policies or regulations enacted
 - Number of residents that receive assistance including rental, loans or down payment assistance
 - Amount of land acquired and reserved for housing

3. A consolidated list of local housing
 - resources for community members,
 - planning documents, and relevant recorded virtual events

SCOPE & TIMELINE OF RECOMMENDED HOUSING TOOLS

TOOL OR PROGRAM	LEAD AND SUPPORTING IMPLEMENTERS	GOAL	SUGGESTED TIMELINE	RECOMMENDED GEOGRAPHIC
Density Bonus	City of Livingston, supported by 3rd party expert	City of Livingston to pass ordinance of incentive program	Midterm	City of Livingston
General Zoning Reform & Flexible Development Standards	City of Livingston, supported by 3rd party expert	Pass ordinance based on recommendations	Midterm	City of Livingston
Increasing Accessory Dwelling Units	City of Livingston, educational support from community organizations including Park County Environmental Council and Park County Community Foundation	Create how-to guide to connect residents to education, financing, and resources to build ADUs	Short-Term	City of Livingston
Community Land Trust (CLT)	HRDC, Habitat, Trust Montana, Gardiner Investment Cooperative	Increase capacity of existing organizations and expand partnerships to add additional homes to CLT portfolio	Immediate	Park County and City of Livingston
Coordinated Entry System (CES)	HRDC supported by members of CES	Have Livingston Healthcare join CES by 2023, continue to meet regularly and increase data collection to advocate for residents	Immediate	Park County and City of Livingston
Down Payment Assistance (DPA)	HRDC, MoFi, Gardiner Investment Cooperative	Provide DPA to households in Park County	Immediate	Park County and City of Livingston
Employer Assisted Housing/ Partnerships	PCHC, local business community	Complete convenings in 2022/2023 and create EHA strategy while ensuring the autonomy of local employees	Immediate focus area of PHCH in 2022	Park County and City of Livingston

SCOPE & TIMELINE OF RECOMMENDED HOUSING TOOLS CONT.

TOOL OR PROGRAM	LEAD AND SUPPORTING IMPLEMENTERS	GOAL	SUGGESTED TIMELINE	RECOMMENDED GEOGRAPHIC
Land Banking	Park County and City of Livingston, public and institutional landowners including school districts	Consider land banking for future success of residents	Ongoing/long term	Park County and City of Livingston
Low-Income Housing Tax Credit	For-profit and nonprofit LIHTC developers supported by local governments	Continue to increase opportunities for low- and moderate-income renters through LIHTC home production	Ongoing	Park County and City of Livingston
Rehabilitation Loans and Grants	HRDC	Continue to weatherize homes in Park County and create new home rehab program for low-income owners and renters through CDBG grant funding	Immediate/Ongoing	Park County and City of Livingston
Resident-Owned Community Program (ROC)	NeighborWorks Montana, supported by Park County	Expand new communities in Park County	Ongoing	Park County and City of Livingston
Short-term Rental Management	Park County Health Department, Park County, City of Livingston, Gardiner Community Council	Increase data collection on the impact of short-term rentals, engage the public and pass a values-based ordinance	Short-term	Park County and City of Livingston



The PCHC priority area subcommittees will move forward on three topics in 2022. Additional information and registration will be available on the PCHC website. Facilitated by the PCHC coordinator, each subcommittee will define the scope and timeline within the first two meetings. There may be a small amount of overlap between the work of the subcommittees. The three priority areas will be focused on:

1. Developing a Community Investment Fund

- This subcommittee will evaluate the existing and future options related to expanding funding opportunities. Examples of options that subcommittee members may choose to advance would be:
 - a. Work with the Montana Cooperative Development Center to establish a community investment fund
 - b. Identify a leading organization and establish a local housing grant program
 - c. Support and organize support for a mill levy to fund housing within the City of Livingston

2. Workforce Housing Challenges & Employer-Based Solutions

- This subcommittee will focus on the impact of housing on the local economy, including examining current housing solutions that may be scaled and establishing new solutions to meet collective housing needs. Some examples of outcomes may include
 - a. Allocating land for housing development
 - b. Providing employees down payment assistance
 - c. Creating a community investment fund (joint-subcommittee outcome)
 - d. Build political will around policy changes and/or large-scale investments

3. Data Tracking/Metrics

- This subcommittee will add capacity to data collection and analysis for the PCHC, including building out the PCHC website and housing dashboard.

This HAP and future PCHC membership priorities will guide future subcommittee work. Existing subcommittees may have the option to extend or conclude and establish new focus areas.

NEXT STEPS

In addition to working throughout Park County, this plan recommends local housing leaders engage in regional housing discussions, coordinate with neighboring counties, and advocate for pro-housing policies at the state level.

Post-adoption by Park County and the City of Livingston, the Park County Housing Coalition will move forward with 2022 subcommittees to address near-term topics and coordinate with the local government to ensure successful implementation of the HAP. The PCHC will continue to be led by HRDC until additional capacity within the community has been identified to serve as the PCHC coordinator.

Initially led by HRDC's community development staff, the PCHC coordinator will be responsible for representing the goals and objectives of this HAP. The PCHC coordinator will monitor relevant local activities that pertain to the goals of this HAP and share information with the membership for advocacy opportunities when appropriate. These duties may include expected or unexpected opportunities to preserve or expand community housing, align infrastructure investments, secure funding from local, state, federal, or philanthropic sources, and support land-use and zoning strategies that align with the goals of this plan.

CONCLUSION

The Park County housing action plan (HAP) is the outcome of a multi-year community engagement effort through the Park County Housing Coalition. The Park County Housing Coalition is a community-based collaborative effort to increase opportunities for Park County residents to access housing where they can afford to live and thrive. In 2022 Park County residents are experiencing a variety of challenges in housing access, affordability, and quality. This HAP provides a roadmap of twelve prioritized tools and strategies taking into account a balanced local housing strategy that includes regulations, programs, funding options and covers a range of household types, ages, geographic, and income spreads. Many stakeholders identified in this plan include the Park County Housing Coalition members, local governments, community partners, and local business representatives. The HAP outlines an implementation plan, schedule, responsible parties, and metrics as Park County works to provide housing opportunities for community members.

