

Bristol Comprehensive Plan

Draft Housing Chapter

For Town Review November 2024

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Introduction

The Town of Bristol is home to a culturally and economically diverse population. The quality of life in Bristol attracts homebuyers from across the region. The Town's community spirit encourages pride and long-term commitment to the community, including people's homes and neighborhoods.

The Town of Bristol recognizes that adequately maintaining and constructing a diverse array of homes is vital for the quality of life in our community and the health of our local economy. It is also critically important for making sure the children and grandchildren of our families with deep roots in the community are able to make their homes here into the future and continue the Town's tradition of pride. The whole town benefits when people have access to a variety of housing types and prices that meet their needs at various stages of life.

Bristol also recognizes that it has limited land and environmental issues, including low-lying lands subject to flooding, that will continue to constrain how many new homes are built and where in town they can best be accommodated. Fortunately, Bristol already has one of the most diverse housing stocks in Rhode Island outside the urban core, with single-family homes of various sizes, two-families, three-families, and both small and larger-scale apartments and condominiums. Unfortunately, the cost of housing is increasingly out of reach for the average household in town, even for more modest housing in traditionally working-class neighborhoods.

Having housing that is safe and affordable is important in order to keep the younger generations in Town, help provide Town services such as the volunteer Fire Department and have a strong workforce. The Town is also aging, and in great need of more independent and assisted living opportunities for seniors as well as support services to help people better age in place. What is good for the growing elderly population is actually good for all residents, such as making streets more pedestrian friendly.

In this challenging situation, the overarching goal is to develop housing policies that meet the needs of our residents and employers, support our neighborhoods, make efficient use of our existing infrastructure, and protect our remaining natural resources today and into the future. There are no easy solutions left, and every decision the Town will make regarding housing will have tradeoffs. This Housing Chapter lays out local policies and implementation actions to provide a range of housing choices, recognizing the local, regional, and statewide housing needs of people at a range of income levels and all stages of life.

One of the major objectives of the Housing Chapter is to reassess the Town's existing strategies to facilitate the development and maintenance of at least 10 percent of the Town's housing stock as subsidized affordable housing as defined by the Rhode Island Low and Moderate Housing Income Act. However, this Housing Chapter also recognizes that market rate housing development and renovation of the existing housing stock are just as important for meeting the long-term housing needs of the community.

Low or Moderate Income Housing

The State’s definition of “low or moderate income housing” includes:

‘any housing whether built or operated by any public agency or any nonprofit organization or by any limited equity housing cooperative or any private developer, that is subsidized by a federal, state, or municipal government subsidy under any program to assist the construction or rehabilitation of housing affordable to low- or moderate-income households, as defined in the applicable federal or state statute, or local ordinance and that will remain affordable through a land lease and/or deed restriction for ninety-nine (99) years or such other period that is either agreed to by the applicant and town or prescribed by the federal, state, or municipal government subsidy program but that is not less than thirty (30) years from initial occupancy’ (www.rilin.state.ri.us).

Low to moderate income (LMI) households in Bristol are defined as those reporting incomes below 80 percent of the median household income for the Providence-Warwick Metropolitan Statistical Area (MSA).

Throughout this chapter, the term “**LMI Housing**” or “**Low-Moderate Income Housing**” will refer to subsidized housing units that count toward the Town’s low or moderate income housing goals. The term “**affordable housing**” will refer to any home that is generally affordable to the occupant, whether market rate, subsidized, owner-occupied, or renter-occupied.

Community Engagement

This chapter was updated with input from many stakeholders, as summarized below. First, several key stakeholders were interviewed to get a sense of how the Town’s housing needs have changed since the last comprehensive plan was adopted. Interviewees included the Bristol Housing Authority, the East Bay CDC, local developers, and the Town Administrator. Next, Town staff discussed the latest housing data and trends with the Planning Board and reviewed the existing Goals, Policies, and Actions for housing, considering what has been accomplished, what is in progress, what has not been accomplished, and what might be missing. The Town hosted a public meeting on May 22, 2024, where residents were asked to provide their thoughts on the Town’s current housing actions and how they might be updated. Participants were also asked three big-picture questions:

Question #1: What is working well with the housing supply and market in Bristol?

Question #2: What needs are not being met? Discuss issues that you, your family, your friends, or your neighbors have had in trying to find the types of housing you need at a price you can afford.

Question #3: What are your big ideas? Be creative! What do you think the community can do to tackle these issues together?

After this discussion, the meeting became an open house. Participants were invited to walk around and look at informational display boards, including:

- Goal and Policy Boards – Modified existing Goals and Policies
- Existing Action Boards – Participants were asked to place dots on the board indicating whether they support, support with changes, or do not support an action.
- Potential Action Boards – The same dot exercise was used to evaluate potential new actions.
- Big Ideas Board
- Zoning Map of Bristol – Where should LMI housing be encouraged?

The first part of the meeting was live-streamed online. In addition, the Town prepared an online survey that replicated many of the same questions discussed in person. In total, approximately 120 people participated in the public meeting and/or the online survey. The Goals, Policies, and Actions presented below were all informed by this feedback.



Bristol Housing Data and Trends

Snapshot

Below is a quick snapshot of some of the key housing statistics for Bristol. The data come from the 2022 American Community Survey.

HOUSING UNITS

9,432

Existing housing units in Bristol.
This number is up 8.4% since 2000

HOUSING OCCUPANCY

86%

Occupied
housing units

14%

Vacant
housing units

YEAR-ROUND vs. SEASONAL

9,095

Year-round

337

Seasonal

HOUSING TENURE

70.2%

Owner-
occupied

29.8%

Renter-
occupied

HOUSING TYPES

70.2%

Single-Family

11.9%

Two-Family

17.9%

Multi-Family (3+ units)

In brief, the housing stock in Bristol has been rising steadily, if slowly, since 2000. These increases are minimal compared with the growth experienced from the 1950s through the 1980s. The calculated vacancy rate is quite high, but it is likely that much of this reflects the increasing number of seasonal homes and properties used as short-term rentals. While only 337 seasonal vacancies were calculated, this is probably an undercount. The owner occupancy rate is just above 70%, much higher than neighboring Warren (54.9%) and Rhode Island overall (59.4%) and much lower than neighboring Barrington (87.0%). About 70% of the Town's homes are single-family units, whether attached or detached, which is much higher than Warren (58.1%) and Rhode Island overall (60.8%) and much lower than Barrington (93.6%).

Housing Costs

Table 1. Bristol Median Home Price Trends, 2019-2024.

Year End	August 2024	January 2024	January 2023	January 2022	January 2021	January 2020	August 2019
Median Sales Price	\$600,000	\$625,000	\$520,000	\$500,000	\$385,000	\$368,000	\$345,000

Source: "Bristol, RI Housing Market," Redfin, 2024, <https://www.redfin.com/city/35723/RI/Bristol/housing-market>. (January 2019 data unavailable.)

Table 2. Bristol Median Rental Prices, 2023-2024.

Year	1-Bedroom Unit	2-Bedroom Unit	3-Bedroom Unit
January 2023	\$2,200	\$2,400	\$2,100
January 2024	\$1,650	\$1,950	\$2,400
October 2024	\$1,900	\$2,200	\$2,550

Source: "Bristol, RI Rental Market," Zillow, updated: October 26th, 2024, <https://www.zillow.com/rental-manager/market-trends/bristol-ri/>.

According to [US Census data](#), for the 2018 to 2022 period, Bristol's median household income was \$91,382 and the median value of owner-occupied housing units was \$426,000. For comparison, for that same period, [the figures](#) for Rhode Island as a whole were \$81,370 and \$343,100, respectively. Broadly speaking, of course, those figures indicate that Bristol residents generally have both higher housing costs and more financial means to meet those costs (although certainly not always - a point later subsections will revisit).

Beyond US Census data, a look at real estate prices online shows a starker picture. For example, the median price for a house in Bristol on [Redfin as of August 2024](#) was \$600,000.

In 2023, according to [an article](#) from East Bay RI, Bristol had the highest price increase (28%) in real estate sales of any community in Rhode Island's East Bay region. Bristol also joined the top ten towns and cities with the highest single-family home values in Rhode Island.

In 2021, the average construction value per permit for a single-family house was \$264,000, compared to \$120,400 in 2000. However, the average cost has varied substantially, going as high as \$662,000 in 2008.¹

¹ "Bristol, Rhode Island," City-Data, last accessed: October 28th, 2024, <https://www.city-data.com/city/Bristol-Rhode-Island.html>.

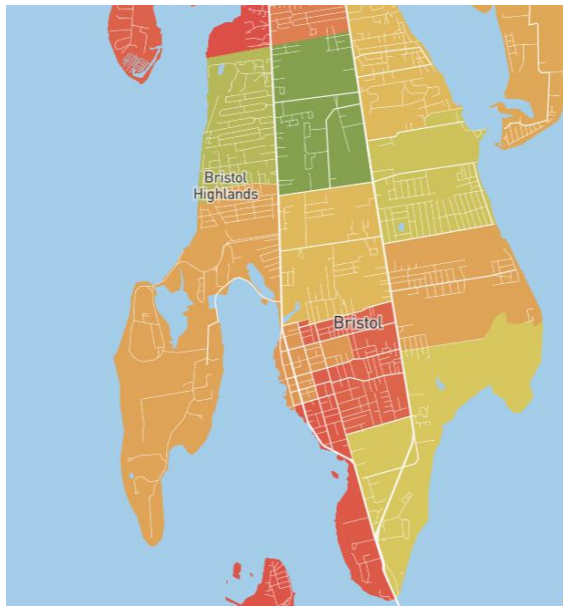
Housing Trends

Age and Condition of Housing Units

Bristol has a relatively old housing stock, with 32.5% of housing units built before 1949 and just 2.7% between 2010 and 2019. The decades from the 1950s through the 1980s are each responsible for over 10% of Bristol's housing stock, with the median home in Bristol constructed in 1966. In other words, many of Bristol's homes have long histories, and the benefits and challenges that come with age.

Older homes can be a wonderful part of a community's heritage and a financial boon for a community if those properties attract tourists or enthusiastic homebuyers. They may also bring maintenance and upkeep costs, not associated with their newer counterparts (for example, if old, unsafe materials, such as lead, need to be removed).

Below is a map of Bristol based on home ages, with the redder colors indicating older homes.



Source: <https://bestneighborhood.org/housing-data-in-bristol-ri/>

The majority of owner-occupied houses have five to seven rooms. By contrast, most renter-occupied apartments have four to five rooms. Most owner-occupied homes have three bedrooms, whereas most renter-occupied homes have one to two bedrooms.

The chart below shows the proportions of different types of homes in Bristol. The dark blue is for single family units, which make up about 70% of all units.

Table 3. Number of Housing Units by Type, 2022.

Single Family Detached	Single Family Attached	2-Family	Multifamily 3-4 Units	Multifamily 5+ Units
5,755 – 61.2%	378 – 4.0%	1,289 – 13.7%	672 – 7.1%	1,318 – 14.0%

Source: American Community Survey 2022

Housing Construction

As the previous subsection discussed, a very large proportion of Bristol’s housing units were constructed before the 1990s. Proportionally, according to the Rhode Island Department of Housing, the years following 1990 saw less housing construction. The years from 2000 to 2022, were responsible for just 12% of owner-occupied housing units, compared to 29% between 1980 and 1999. For renter-occupied housing units, only 7% were built between 2000 and 2022.

The relatively low amount of housing construction during the 2000 to 2022 period might be less surprising in light of population trends. In 2000, Bristol’s population was around 22,500, before shooting up to a peak for that period of around 24,500. The population then declined and rarely increased above 22,500 between 2010 and 2022. Additionally, the average household size remained almost the same between 2010 and 2022, at 2.31 and 2.32, respectively.

Permitting and construction completion data speaks to a tendency toward building single-family homes, rather than multifamily homes. In 2023, 11 new single-family units were completed, whereas no multifamily units were.² Of the 24 total housing units permitted in 2022, 16 were single-family units and 8 were multifamily units. This tendency is worth being aware of because it may affect factors like population density, availability of land, and construction and housing costs.

Occupancy

As of 2022 there were 8,065 occupied housing units in Bristol, 5,700 (or 70.2%) of which were occupied by the homeowners. Renters occupied 2,414 (or 29.8%) of the units. There were no vacancies among owners, but the rental vacancy rate was 8.2%. As a point of comparison, the nationwide vacancy rate for homeowners and renters was 0.8% and 5.8%, respectively.

There are many factors that can affect occupancy rates. One factor is age of homes. Many of the homes that renters live in are older. Sixty-one percent of renter-occupied housing units were built before 1960 (compared to 33% of owner-occupied housing units).

Another factor is short-term rentals. According to a 2023 report from the Rhode Island Foundation, Bristol had 106 units listed on short-term rental websites, outpaced by

municipalities like Narragansett (784) and Providence (313), but well above municipalities like Warren (42), Cranston (41), and East Greenwich (8).³

Academic institutions like Roger Williams University can be another factor. Some housing units may be unoccupied during transition periods in the academic calendar.

Framework for Housing

Zoning for Residential Uses

The Town of Bristol is divided into 18 base zoning districts, of which 12 districts allow for one or more types of standard residential use. Compared with many of its neighbors, Bristol's zoning allows for a wide range of housing types. Notably, Bristol has five zoning districts in which multi-household dwellings are allowed by right.

Table 4. Types of Residential and Mixed-Use Zoning Districts and the Types of Housing They Allow, 2024.

Name of District	Types of Housing Allowed	Minimum Lot Size (in Square Feet)	Notes
R-80 Zone	Single Household Dwelling	80,000	
R-40 Zone	Single Household Dwelling	40,000	
R-20 Zone	Single Household Dwelling; Two-Household Dwelling	20,000	Two-Household Structures allowed if at least one unit is deed restricted LMI housing.
R-15 Zone	Single Household Dwelling; Two-Household Dwelling	15,000	Two-Household Structures allowed if at least one unit is deed restricted LMI housing.
R-10 Zone	Single Household Dwelling; Two-Household Dwelling	10,000	
R-10SW Zone	Single Household Dwelling; Two-Household Dwelling	10,000	
R-8 Zone	Single Household Dwelling; Two-Household Dwelling	8,000	
R-6 Zone	Single Household Dwelling; Two-Household Dwelling; Multi-Household Dwelling	6,000	6,000 square feet for the first dwelling unit and 4,000 square feet per additional dwelling unit

³ Rhode Island Foundation. *Housing Supply and Homelessness in Rhode Island*. April 2023.
<http://assets.rifoundation.org/documents/RI-Foundation-Coalition-x-BCG-Final-Report-June-2023-vF-1.pdf>.

			where public water and sewer required.
LB Zone	Single Household Dwelling; Two-Household Dwelling; Multi-Household Dwelling		
MMU Zone	Multi-Household Dwelling		Residential on upper floors of buildings only.
D Zone	Single Household Dwelling; Two-Household Dwelling; Multi-Household Dwelling		
W Zone	Single Household Dwelling; Two-Household Dwelling; Multi-Household Dwelling		Ground floor commercial uses are required for larger-scale multi-household dwellings.

Bristol's Housing Agencies and Programs

The Bristol Housing Authority (BHA) works to make affordable housing opportunities available to Bristolians. BHA is part of Bristol's Onboard System, a collaboration between the Town and different organizations to offer services to Bristolians in need. BHA oversees Benjamin Church Manor, an affordable housing complex for the elderly.

The East Bay Community Development Corporation (EBCDC) is a nonprofit organization that has been working for over 30 years to build and preserve affordable housing for low to moderate income residents in Bristol, Barrington, and Warren. The EBCDC is currently responsible for over 300 apartment units in those three towns and Franklin Court Independent Living and Franklin Court Assisted Living (both in Bristol). Originally called the Bristol Foundation, the East Bay CDC was born in 1989, the result of a study the Town of Bristol had commissioned. Its inception was initially focused on revitalizing the neighborhood around the Kaiser Mill Complex. The Kaiser Mill Complex is now home to Franklin Court Assisted Living.

The Housing Network of Rhode Island (HNRI) is an association of the state's Community Development Corporations (CDC). To help make housing more affordable for Rhode Islanders, HNRI advocates for state policies, connects first-time homebuyers and landlords with classes on home buying, and provides housing-specific informational resources to homebuyers, homeowners, tenants, and member organizations. HNRI is also affiliated with the Community Housing Land Trust of Rhode Island (CHLT), a nonprofit which works with developers and municipalities across Rhode Island to develop affordable housing. After construction, they also work with different stakeholders to ensure the property is compliant with deed restrictions requiring it to be affordable. HNRI plays this role for many properties in Bristol.

Bristol has tax exemptions for seniors, which can ease the financial burden of living in Bristol. The table below details the annual exemptions, per the Bristol Town Code.

Table 5. Bristol’s Tax Exemptions for Seniors By Age, 2024.

Ages 65-69	Ages 70-74	Ages 75 and Older
\$15,000	\$ 17,500	\$ 20,000

Source: Bristol, RI Town Code., § 27-9. - Entitlements and amounts (2024).
https://library.municode.com/ri/bristol/codes/code_of_ordinances?nodeId=PTIVCO_CH27TA_ARTIINGE_S27-9ENAM.

Bristol has a Home Repair Program. The Town started the program in order to help residents, notably those with limited financial means, improve their homes. To receive support through this program, applicants must meet certain income requirements determined each year by the U.S. Department of Housing and Urban Development (HUD).⁴

Issues and Opportunities

Cost Burden

Cost Burden refers to any household paying more than 30% of its income on housing. Severe Cost Burden refers to any household paying more than 50% of its income on housing. Table 6 below summarizes cost burdened households of various kinds within Bristol.

The fact that nearly 1/3 of all households in Bristol are cost burdened should be a concern for the Town. Whether people choose to or are forced by circumstances to spend more than 30% of their incomes on housing, this means they have less disposable income to spend both on other necessities such as food and health care, and at local shops, restaurants, and service providers. In other words, the entire economy is impacted.

It should come as no surprise that LMI households (making less than 80% of the Area Median Income) have much higher rates of cost burden than the average household. About 2/3 are cost burdened, and over 1/3 are severely cost burdened, significantly limiting the amount of income they have available for other expenses. It is also no surprise that while just under 30% of Bristol residents live in rental households, over half of cost burdened LMI households do. That said, a significant number of cost burdened LMI households are homeowners, perhaps reflecting retirees on a fixed budget or people who choose to live where they do in spite of the burden on their incomes.

Table 6. Bristol CHAS Data, 2017-2021: Cost Burden

	Number of Households	Percent
Number of Cost Burdened Households	2,514	31.2% of total households

⁴ For more information about the Town’s program, visit: <https://bristolri.gov/330/Bristol-Home-Repair-Program>.

Number of Severely Cost Burdened Households	1,125	14.0% of total households
Number of LMI Cost Burdened Households	1,770	66.7% of LMI households
Number of LMI Severely Cost Burdened Households	905	34.1% of LMI households
Number of LMI Cost Burdened Households that are renting	920	52.0%
Number of LMI Cost Burdened Households that own their home	850	48.0%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2017-2021

The map below shows how Rhode Island municipalities compare in terms of percentage of households that are housing cost burdened.

[Note: Map to be inserted.]

Local Needs

One of the best sources of data on local housing needs and problems is the Comprehensive Housing Affordability Strategy (CHAS) developed by U.S. HUD. The CHAS data track four different housing problems, including: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. Table 7 captures households with at least one such problem, organized by renters vs. owners and by household income. The acronym “HAMFI” stands for HUD Area Median Family Income. This is calculated by HUD for each jurisdiction and will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made by the agency. The numbers in the “Percent” column represent the percent of households in each category with at least one housing problem. For example, in the first row of statistics in Table 7, “485” represents 89% of all renter households earning less than 30% HAMFI.

Table 7. Bristol CHAS Data, 2017-2021.

Households with at least 1		
Household Income	Housing Problem	Percent
RENTERS		
≤ 30% HAMFI	485	89%
> 30% - ≤ 50% HAMFI	285	95%
> 50% - ≤ 80% HAMFI	150	28%
> 80% - ≤ 100% HAMFI	40	14%
> 100% HAMFI	10	1%
Total	970	38%

OWNERS		
≤ 30% HAMFI	245	89%
> 30% - ≤ 50% HAMFI	235	72%
> 50% - ≤ 80% HAMFI	370	55%
> 80% - ≤ 100% HAMFI	175	46%
> 100% HAMFI	340	9%
Total	1,365	25%

Source: “Consolidated Planning/CHAS Data,” Department of Housing and Urban Development Office of Policy Development and Research, last accessed: October 30th, 2024, <https://www.huduser.gov/portal/datasets/cp.html#year2006-2020>.

It is no surprise that income generally correlates with housing problems. The lower a household’s income, the more likely it is to have at least one housing problem. The one notable exception is that renter households making less than 30 percent of the HAMFI are a little less likely to experience housing problems than households making between 30 percent and less than 50 percent HAMFI. One possible explanation is that a greater portion of very low-income renters are receiving some sort of housing subsidy, giving them access to higher-quality homes. Also of interest is that LMI homeowners (those making less than 80% HAMFI) are far more likely to experience housing problems than LMI renters. For renters, households making over 100 percent HAMFI have very little exposure to housing problems. However, nearly 10% of owner households making that income do.

Homelessness

Before providing an overview of homelessness in Bristol, it is worth briefly discussing two factors related to homelessness: evictions and foreclosures. According to [the Eviction Lab](#), over the last year, Bristol County had relatively few eviction filings (123) compared to other Rhode Island counties, most notably Providence County (6,169) and Kent County (960).⁵ As of mid-September of 2024, Bristol County’s number of filings has also decreased by 27% from the average year (for the 2016-2019 period).⁶ This year, Bristol County also had relatively fewer foreclosure rates. It had the second lowest number of foreclosures per housing unit (Newport County had the lowest), per [Social Finance, LLC](#) in 2024.

Another metric that can help assess homelessness levels is the number of homeless children in school. The table below indicates how many children identified as homeless were enrolled in the Bristol Warren Regional School District in different school years.

⁵ Numbers are found by hovering the cursor over each county.

⁶ Percentage is found by selecting “Relative to Average” among the options next to the map and then hovering the cursor over each county.

Table 8. Number of Children Identified as Homeless in the Bristol Warren Regional School District, 2008-2023.

Years	Number of Children Identified as Homeless
2022-2023	27
2021-2022	17
2020-2021	22
2019-2020	37
2018-2019	35
2017-2018	24
2016-2017	11
2015-2016	17
2014-2015	18
2013-2014	17
2012-2013	15
2011-2012	13
2010-2011	9
2009-2010	3
2008-2009	3

Source: Rhode Island KIDS COUNT Factbooks 2010 - 2024 "Publications," Rhode Island KIDS COUNT (2024), <https://rikidscount.org/archives/>.

According to [RI News Today](#), The Veterans Home in Bristol reserved, as of 2022, 16 beds for homeless veterans.

Low and Moderate Income Housing

Low and Moderate Income Housing Data and Trends

The Low and Moderate Income Housing Act (R.I.G.L. 45-53), mandates that Towns that do not conform to the Act find ways to encourage low-moderate income (LMI) housing development. Towns are required to maintain at least 10 percent of the total housing stock for low-moderate income households. Communities that already maintain 10 percent of their total housing stock as LMI housing are exempt from the act.

The Town adopted its Low and Moderate Income Housing Plan in 2005. The plan contained strategies for achieving the 10% LMI threshold as required under the Low and Moderate Income Housing Act (Act). These strategies were later incorporated into this housing chapter of the Town's Comprehensive Community Plan.

Why should the Town care to reach the 10 percent goal? If reached, Bristol would no longer be subject to housing development through Comprehensive Permits. Such developments currently may be allowed to override local zoning if they provide a certain percentage of LMI housing. By achieving 10%, Bristol would have more control over local land use decisions in the future. To

reiterate, “LMI” refers to “Low-Moderate Income” households, or those making 80% of the Area Median Income or less. Of course, maintaining the 10 percent goal requires additional work – as new market rate units are built new LMI units are needed to keep up. Tools such as Inclusionary Zoning (discussed below) are a good way to maintain the 10 percent goal over time.

Current LMI Count

As of 2023, Bristol has 529 LMI units, or 5.69% of Bristol’s total year-round units identified in the 2020 US Census. Below is a summary of all the LMI homes in Bristol that count towards the 10% LMI threshold as of 2023. After several years of steady progress, the number of LMI units in Bristol have been on a slow decline since 2019, when there were 537 units or 5.96%. As shown in the table below, over 2/3 of the Town’s LMI units are reserved for seniors and over 80% are available as rentals.

Currently, there are only a handful of potential new LMI units in the development pipeline. The Bristol Yarn Mill will either include 13 LMI units or else will pay a fee in lieu that will help fund the development of 13 LMI units elsewhere. In addition, the redevelopment of the Oliver School is likely to produce two new LMI units. This would bring the total to 544 in the near future. The calculations throughout the remainder of this chapter assume a baseline of 544 LMI units.

Spotlight on the Bristol Yarn Mill

The Bristol Yarn Mill is a unique case for Bristol. The fee in lieu was based on a negotiation with the Town Council in exchange for a zoning change. The Town worked with a consultant team to explore ways to use the fee in lieu to finance the development of at least 13 LMI units. The most likely solution is a revolving fund that would “buy down” deed restrictions on Accessory Dwelling Units. See more under the LMI Housing Strategies below.

Table 9. Low-Moderate Income Homes, 2023.

Housing Type	# of Units
Elderly	357 (67.5%)
Family	104 (19.7%)
Special Needs	68 (12.9%)
Ownership	50 (9.5%)
Rental	437 (82.6%)

Source: “Welcome,” State of Rhode Island Department of Housing, 2024, <https://housing.ri.gov/>.

Low and Moderate Income Housing Policy

In an effort to clarify Bristol's position on affordable housing, the following policy statement was developed for the 2009 Comprehensive Plan and re-affirmed with the last plan update as well as this plan update. Bristol supports the development of housing that helps to meet the needs of all Bristol's "local residents". Bristol is also willing to do its share to assist in meeting the housing needs of the regional population, but within the context of a broad, cooperative, fair share policy that involves all of Bristol's neighboring Towns. Bristol has great concerns over pursuing housing strategies based on past theories of public housing provisions, specifically the development of large projects for specific socioeconomic groups.

Bristol is a town that has always had a rich mixture of housing types blended together within the downtown. The outlying single-family neighborhoods have developed in a variety of lot sizes and development patterns. Bristol has never created large multifamily developments that then deteriorated causing yet more problems for residents and non-residents alike. Bristol shall not pursue that strategy in the future. In order to guide affordable housing development in Bristol, the following development standards were adopted.

Affordable housing in Bristol shall:

1. Be integrated with market price units.
2. Be dispersed throughout town rather than being congregated in specific areas or projects. It shall be developed in areas that are suitable for any type of housing development.
3. Be designed so as to physically blend with surrounding market price units in terms of height, massing, site design, and architectural treatment.
4. Be designed to give residents and neighbors pride in their homes.
5. Be developed to give residents the opportunity to share in the ownership of at least some of the units where feasible given the particular needs.

Low and Moderate Income Housing Projected Target

There are several ways to calculate the LMI housing target for the Town. Below is an update using the methodology from the Town's 2016 comprehensive plan as well as an alternate and perhaps more accurate methodology based on recent housing starts. Both methodologies surmise what can be achieved by 2040 (15-year horizon).

Update Using 2016 Methodology

The housing target is calculated as follows:

Current population = 22,493 per the 2020 Census.

2040 population projection = 23,771 per Rhode Island Statewide Planning Program population projections.

Average Household Size = 2.57 owner occupied (70.2% of occupied housing units), 1.71 renter occupied (29.8% of occupied housing units) per American Community Survey 2022.

Current housing units = 9,629 per the 2020 Census.

2040 housing unit projection = 6,493 owner-occupied and 4,143 rentals (10,636 units total). Calculated by dividing the 2040 population projection between 70.2% owner occupants and 28.8% renters and then dividing those portions respectively by the average household size for owners and renters.

Forecasted 10% threshold = 1,064 (calculated by multiplying the 2040 housing projection by 10%)

Existing affordable units = 544 (as of 2023 + expected 15 units)

Forecasted to need by 2040 = additional 520 units (1,064 10% threshold – 544 current LMI units)

Per the assumptions above, just over 1,000 additional units of housing will be needed to accommodate Bristol's population growth in the next 15 years. This assumption is also in line with the trend in smaller household sizes, which means that more units are needed to accommodate the same number of people. For example, a single-family house might have housed seven people 20 years ago (two parents, four children, and a grandparent, for example) but today those seven people are more likely to be split into multiple households (say, two parents and one child, a childless couple, and two adults living on their own). "New" units may come from the subdivision/redevelopment of existing buildings as well as brand new construction.

Revised Methodology

That said, population projections are a loose art, at best. Basing future development on population projections is potentially less realistic than basing it on development trends. As Bristol is largely built out, new housing unit starts are very low. The average number of new housing units built between 2018 and 2022 was 18.6 per year. At that rate, it would take over 54 years to develop 1,000 new units. This also means that in the next 15 years, only about 279 new units of housing can be expected, barring some large developments.

Revised housing unit projection = 279 units + existing 9,629 units = 9,908 units

Re-Forecasted 10% threshold = 991 units (calculated by multiplying the revised projection by 10%)

Forecasted to need by 2040 = additional 447 units (991 10% threshold – 544 current LMI units)

Low and Moderate Income Housing Strategies

As required by the Rhode Island Low and Moderate Income Housing Act, the Town has identified specific strategies to attain the ten percent threshold goal for low and moderate income (LMI) housing. This section presents a detailed explanation of the strategies and along with quantitative estimates of the number of LMI housing units expected to be generated by each strategy over the next 15 years.

Inclusionary Zoning (IZ)

IZ is the most significant tool in the municipal toolbox for LMI housing. However, in a situation where the Town is largely built out and many new units will come from renovations or redevelopment, this will produce fewer units than in less built out communities. It is also reliant on new market rate development, which the Town can encourage and enable, but not control. Nevertheless, it is a vital tool toward making progress.

If 279 new units can be expected over the next 15 years, how many of those can realistically be LMI under inclusionary zoning? Given that the Town is largely built out, and that opportunities for single-family subdivisions are limited, it is probably fair to assume that most new development will be individual infill single-family homes or small-scale multi-family housing (new or redevelopment) moving forward. If the Town reinstates IZ with a trigger of five units, it might be reasonable to assume that half of all proposed units will be subject to IZ, or about 140 units. The calculation below assumes an IZ policy that requires 15% of all housing development of five or more units to be LMI housing.

IZ at 15% = 21 LMI units (140×0.15)

Comprehensive Permits

“Comp” Permits are the other major tool for LMI housing. Again, while municipalities can proactively partner with non-profit developers and property owners to encourage comp permits in certain areas, they do not have direct control over development proposals. Comp permits generally fall under one of two categories:

- “Friendly” Comp Permits – Sites identified and encouraged by the Town. Partnerships with local CDCs or “friendly” private developers.
- Other Comp Permits – Developer driven - can be proposed anywhere.

This Comprehensive Plan continues to calculate potential LMI units based on specific properties where Comp Permits could be encouraged or expected. While some of the properties on this list may not be ripe for housing development today, it is important to plant the seeds. A project that is untenable today may unfold in the future with persistent work and negotiation with property owners.

To calculate the potential under this tool, the Town has included 1) properties where future development will be encouraged, and 2) Assumptions about the outcomes of partnering with

East Bay CDC and/or other local developers to proactively look for other opportunities, large and small, to invest in LMI housing (including through the reuse or sale of town-owned property). Such proactive partnerships could be part of the role of an Affordable Housing Committee.

The following is a list of properties with long term potential for future comp permit development/redevelopment:

1. Ferreira on Bayview Avenue
2. Almeida Apartments on Bayview Avenue
3. Francis property on Bayview Avenue
4. Second floor addition on Gooding Plaza shopping center
5. Second floor addition on vacant Bristol Toyota building at Metacom Avenue
6. Perry Property at Metacom Avenue across from Chestnut Street
7. King Phillip Hotel, reuse
8. Columban Fathers Monastery at Ferry Road - Future reuse of dormitory building
9. Unity Park former industrial buildings
10. St. Elizabeth's Church school - Reuse of vacant school building.

If the Town remains aggressive with this strategy, it may be possible to reasonably assume 75 new LMI units in the next 15 or so years, or an average of about five per year. However, such developments will likely occur sporadically, so there will be some years where this strategy produces no units at all and others where it may produce far more than five.

Accessory Dwelling Units

ADUs are notoriously difficult to deed restrict as LMI housing. However, the Town is exploring funding options for a revolving fund that would help “buy down” deed restrictions on ADUs. At a minimum, this could be a one-time funding of 13 LMI ADUs (which is included in the assumption of 544 current LMI housing units in Bristol). The exact number is to be determined, but with a revolving fund, the Town could perhaps buy down two ADUs per year for a total of 30 over the next 15 years. Because the 13 units from the fee in lieu are already included in the base number of LMI housing units, only an additional 17 LMI ADU units are assumed in the calculations below.

Condition of Variances or Zoning Changes

This has been a successful strategy on a small scale. The Town can pursue this more aggressively, particularly with properties that take advantage of the Metacom Mixed Use zoning district (MMU). Several properties along Metacom Avenue are called out in this comprehensive

plan as being appropriate for rezoning for higher density mixed-use, but the zoning is not actually changed until requested by the property owner and agreed to by the Town. Of course, any such development will be subject to Inclusionary Zoning, but the Town can negotiate with property owners to secure even more LMI units in the case of a variance or zoning change. Realistically, on average, this is unlikely to produce more than 1 unit per year, or about 15 units over 15 years.

Deed Restricting Existing Housing Stock

This is a strategy that many municipalities would like to see work on a larger scale. This could involve outright purchasing of existing properties by the Town or a non-profit developer (for example, East Bay CDC is always on the lookout for such opportunities); providing tax incentives or cash payments for property owners willing to deed restrict their properties; or obtaining existing buildings through tax sales. If the Town more aggressively partners with East Bay CDC, Habitat for Humanity, and other non-profit developers, it might be reasonable to expect perhaps that 2 existing units could be deed restricted each year, for a total of 30 units over 15 years.

Potential LMI Housing Progress

Based on the assumptions above, the following may be a realistic expectation of Bristol's progress towards 10% LMI housing by 2040.

Inclusionary Zoning: 21 units

Comprehensive Permits: 75 units

Accessory Dwelling Units: 17 units

Condition of Variances or Zoning Changes: 15 units

Deed Restricting Existing Housing Stock: 30 units

Maximum Total: 158 units

Total LMI Housing by 2040: 702 (158 + 544)

Percent LMI Housing by 2040: 7.1% (702 / 9,908 Revised housing unit projection for 2040)

Note: If an ADU revolving fund is not established and only 13 LMI ADU units are created as a one-time investment, the Total LMI Housing by 2040 would be 141 + 544 = 685 or 6.9%.

At current rates of development and given the current resources available to renovate and deed restrict existing buildings, Bristol can make good progress toward reaching 10% in the next 15 years, but it is likely to take several more decades before the target is reached. Looking further into the future, if the Town continues to steadily apply these strategies, the 10% target is likely

to be achieved in the next 40-45 years. Assuming a 45-year target of 2070, the following is possible:

Revised housing unit projection = 837 new housing units (18.6 units per year x 45 years) + existing 9,629 units = 10,466 units

Re-Forecasted 10% threshold = 1,047 units (calculated by multiplying the revised projection by 10%)

Forecasted to need by 2070 = additional 503 units (1,047 – 544)

Inclusionary Zoning: 63 units

Comprehensive Permits: 225 units

Accessory Dwelling Units: 77 units (or zero if a revolving fund is not established)

Condition of Variances or Zoning Changes: 45 units

Deed Restricting Existing Housing Stock: 90 units

Maximum Total: 500 units

Total LMI Housing by 2070: 1,044 (500 + 544)

Percent LMI Housing by 2070: 10.0% (1,066 / 10,466 - Revised housing unit projection for 2070)

Note: If an ADU revolving fund is not established and only 13 LMI ADU units are created as a one-time investment, the Total LMI Housing by 2070 would be 423 + 544 = 967 or 9.2% and a few more years of work would be needed to reach 10%.

Housing Goals, Policies, and Strategies

Housing policies must support a broad range of housing opportunities so that Bristol can continue to provide housing that is affordable to its traditionally diverse population and to ensure that all neighborhoods are livable places. Based on the critical issues described in this chapter and the overarching housing policies stated above, this section presents the goals, policies, and strategies developed by the Town of Bristol to guide its homes and neighborhoods.

The goals and policies are listed first, followed by the strategies. The strategies are inclusive of the LMI strategies discussed above.

Housing Goals and Policies

Goal H1: Work for a continued range of housing opportunities so that Bristol can continue to be home to our traditionally diverse population.

Policy H1.1: Prioritize Town efforts to address local housing needs that the private market is not meeting on its own, whether market rate or LMI, owner or rental, etc. This could include things such as senior housing, assisted living, smaller scale apartment buildings, or housing affordable to individuals or families making less than the Town's median income.

Policy H1.2: Address the needs of Bristol's special demographic groups, to include: working families, single parent families, parents whose children are grown, persons living alone, and the elderly.

Policy H1.3: Make sure that housing programs first meet the needs of Bristol residents.

Policy H1.4: Encourage a broad range of housing costs, with special emphasis on creating and maintaining houses and apartments that are affordable to working individuals and families making less than the Town's median income.

Policy H1.5: Continue programs to help elderly and others on fixed incomes stay in their homes.

Policy H1.6: Encourage coordination among public agencies and community organizations to leverage their resources and generate new programs that can better meet local housing needs.

Goal H2: Ensure that neighborhoods are livable places.

Policy H2.1: Properties with potential historical and architectural value should be surveyed and considered for designation for preservation.

Policy H2.2: The Town is encouraged to investigate new urbanism techniques such as form-based zoning regulations to guide the design of significant mixed-use redevelopment and design guidelines for infill development to maintain characteristics of existing residential neighborhoods and Bristol's historic downtown.

Policy H2.3: Sidewalks are encouraged for safety and sustainability purposes in new residential and mixed-use developments.

Policy H2.4: Connectivity must be maintained between neighborhoods as essential to quality of life, as well as for safety and convenience.

Policy H2.5: Address the issue of exterior lighting for public and private development, balancing the need for adequate lighting with the need to avoid excessive lighting on nearby residences.

Policy H2.6: Provide adequate water supply and pressure.

Policy H2.7: Buffer neighborhoods from incompatible land uses.

Policy H2.8: The Town should continue to call for adequate buffer zones between incompatible uses (i.e. between adjoining industrial and residential areas).

Policy H2.9: Take into account existing land use patterns when designing new zoning regulations.

Policy H2.10: Promote good design in all future developments that is appropriate to Bristol and to surrounding homes.

Policy H2.11: Require that new developments stay within a scale that is appropriate to Bristol and to surrounding homes.

Policy H2.12: Strengthen the services and amenities that make Bristol a good place to live.

Goal H3: Create affordable housing opportunities and diversify the housing stock.

Policy H3.1: Create a diversity of housing types that meets the current and future needs of low-moderate income residents, employees, and special needs populations. While Bristol does currently have housing for the elderly, families, single persons, and special needs populations, the majority of housing being built in Bristol is out of the reach of the low-mod populations. The housing gap this causes will continue to grow unless Bristol continues to actively and aggressively pursue the development of affordable housing within the town.

Policy H3.2: Meet 10% Goal for Low and Moderate Income (LMI) housing.

Policy H3.3: Provide housing opportunities for the Town's special needs populations. Achieve or maintain, whenever possible, at least a few housing units that will provide opportunities to households of one or more of the groups that have been identified as being of particular need in Bristol. Include careful and creative decisions about how the public purpose of expanded housing opportunity can be combined with other public purposes on any given site.

Policy H3.4: Revise the zoning ordinance to promote affordable housing and housing that meets the needs of all Bristol citizens.

Policy H3.5: Identify potential locations for LMI housing development.

Policy H3.6: Strengthen partnerships and build community support for affordable housing development.

Policy H3.7: Identify existing and new resources for affordable housing development.

Policy H3.8: Encourage public/private partnerships for the creation of LMI housing which will provide additional funding opportunities such as grants.

Policy H3.9: Ensure the long-term affordability of housing by requiring 99-year deed restrictions on LMI housing.

Housing Strategies

H1. Adopt a **public advertising campaign** to educate residents on the need for the creation of LMI housing units.

Misinformation and a lack of information can be major barriers to LMI housing. Throughout the public outreach process, participants noted it would be beneficial to educate people about what LMI units are, who needs them, and what is involved in creating them. An advertising campaign could be one approach to significantly educate the public.

H2. Build an **Affordable Housing Trust Fund** to help give the Town a tool to invest in the types of housing most needed by the community in the places where it makes most sense to have it.

This program would provide financial assistance to initiatives that are directly aimed at creating more affordable or LMI housing units. The Town may choose to use some or all of the fee in lieu from the Bristol Yard Mill development to seed such a fund, as well as any future negotiated fees in lieu, grant funds, or general Town revenues.

H3. Work with **RWU** to encourage **more on-campus student housing** and agree on a right of first refusal to turn the **Almeida Apartments** into LMI housing over time.

Encouraging more on-campus student housing could reduce the number of students who compete with non-students for housing not provided by the university.

H4. Re-institute the **Affordable Housing Committee** to help identify affordable housing opportunities, advocate for / educate about affordable housing needs, and explore more creative ways to achieve affordable housing goals.

The Town had an Affordable Housing Committee (AHC) that helped draft the initial housing strategies back in 2005. Once this was completed, the AHC disbanded. A revived AHC could help create content for a public education campaign on affordable housing, manage the Affordable Housing Trust Fund (in an advisory capacity), and otherwise support Town staff in implementing the strategies of this chapter.

H5. Develop a program with the Bristol Housing Authority to **educate landlords** and encourage them to participate in the **Section 8 Housing Choice Voucher** program.

Through the Section 8 Housing Choice Voucher program, the U.S. Department of Housing and Urban Development (HUD) provides funding to public housing agencies (PHAs), in this case the Bristol Housing Authority (BHA). The PHA then passes on the funds as rental assistance to eligible people (very low-income families, the elderly, and the disabled) who can find rental units owned by participating landlords. There are currently more recipients than apartments available. Expanding the number of landlords willing to accept vouchers will make more of the existing housing stock affordable to more people.

H6. Formalize agreements with East Bay Community Development Corporation and the Housing Network of Rhode Island to serve as the **monitoring agents** for privately owned LMI housing units and ensure that such housing is not lost over time.

The Town currently has had this arrangement informally with the East Bay Community Development Corporation, a nonprofit focused on affordable housing, and the Housing Network of Rhode Island. Formalizing these arrangements could involve the Town signing Memorandums of Understanding (MOUs) with these organizations and, as part of those agreements, requiring a tracking system for when deed restrictions are set to expire. That tracking system would alert Town staff and the AHC (if reestablished) when they need to start working with property owners well in advance to find financing or other mechanisms to extend deed restrictions.

H7. Utilize the services of the **RWU's Community Partnerships Center** to develop creative ways to provide affordable and LMI housing.

RWU's Community Partnerships Center's mission is to undertake and complete projects that will benefit local communities within Rhode Island and Southeastern Massachusetts, while providing RWU students with knowledge in real-world projects that deepen their academic experiences." The Town of Bristol is already a community partner with the center, as is Benjamin Church Manor, which provides affordable housing to Bristol seniors. Town staff and the AHC should approach the Center to assist with any research needed to implement the strategies of this chapter.

H8. Continue and expand the Town's Community Development Block Grant (CDBG) **home repair and home maintenance grant and loan programs**.

With CDBG funding from the U.S. Department of Housing and Urban Development (HUD), Bristol runs a Home Repair Program aimed at helping residents who may have limited financial means to make improvements to their homes. This program has helped many individuals and

families, and could be expanded from other sources, including the Affordable Housing Trust Fund.

H9. Consider the best use or reuse of **town-owned property** to include LMI housing and/or a portion from the sale to be applied to a housing trust or first-time homebuyer program.

The Town should maintain a running list of properties it owns and annually evaluate which uses would best serve the community. While there may be limited opportunities with this strategy in the foreseeable future, it is a valuable process to evaluate this annually. Note that the former schools on the Town Common must remain in general public use per the grand deed, and may not be converted to housing. (See LMI Housing Strategies for greater detail.)

H 10. Work with the General Assembly to **broaden the definition of LMI housing** to include modestly priced and locally affordable units within the community.

The Town will continue to advocate for this strategy. Certain landlords charge tenants less than the upper limit that officially defines a unit as LMI. In other words, those units could be defined as LMI because they are affordable (would represent 30% or less of a household's income) for people making 80% or less of the area median income (LMI). Many landlords are reluctant to agree to a 30+-year deed restriction, currently a requirement for most homes to count as LMI. Further, landlords would need to be willing to verify annually the rents they are charging and the incomes of their tenants.

H 11. Continue to participate in the **Community Rating System (CRS) of the National Flood Insurance Program**. Advocate for and explore options to raise the Town's credit for increased discounts on Flood Insurance Policies.

The Federal Emergency Management Agency (FEMA) oversees the CRS, a voluntary incentive program that rewards National Flood Insurance Program (NFIP) Communities for doing floodplain management activities that go beyond the minimum NFIP requirements. In exchange for performing those activities, the community receives discounts on flood insurance premiums. This approach saves money, which can benefit the community, and reduces the flood risks the community faces.

The Town is now at a Class 7 CRS rating, meaning that Bristol residents who purchase or renew their flood insurance policies for properties in a Special Flood Hazard Area in Bristol will have their flood insurance premium discounted by 15%. The Town can continue to implement actions that will help improve its ratings under the CRS Program even further.

H12. To provide incentive for creating and maintaining LMI housing, the Town will proactively **reach out to property owners of deed restricted units** to inform them they are eligible to limit the property taxes on the LMI unit to 8% of the gross income received from the unit.

Many Bristol property owners who are eligible for this tax incentive do not take advantage of it. One barrier could be that many property owners are simply not aware that the tax incentive exists. Others are wary of the paperwork it would take to verify their eligibility. To address that barrier, the Town can work to inform property owners about this, including through the public advertising campaign described for strategy 1. In addition, the Town can work with the Housing Network of Rhode Island to provide support to property owners to maintain and submit their paperwork.

H13. Continue to identify locations where the Town would like to proactively encourage the development of LMI housing through **“friendly” comp permits**.

Under Rhode Island law, an applicant proposing to build housing that qualifies as at least 25% low- or moderate-income may apply for a comprehensive (comp) permit, instead of submitting separate applications to different local boards. In other words, the permit allows the developer to move through the approval process more quickly and have a higher density of units in the proposed property. (See LMI Housing Strategies for greater detail.)

H14. Require or continue to negotiate LMI units as a **condition for zoning relief**, and changes of zone that include residential uses.

The Town currently often negotiates with developers to provide more LMI units in exchange for zoning relief. The Town could set a policy requiring developers to produce a certain number of LMI units in exchange for zoning relief. Alternatively, the Town could continue to negotiate with developers, adjusting the number of LMI units they request on a case-by-case basis. (See LMI Housing Strategies for greater detail.)

H15. Create an **information packet for for-profit developers** to help promote the creation of LMI housing.

The Town could create the packet by adapting resources from Rhode Island and Massachusetts municipalities and from Rhode Island state agencies, such as Rhode Island Housing and the Rhode Island Department of Housing. The packet could include information about income limits and prices for LMI units/rentals, contact information for the monitoring agency, a draft deed covenant, preferred areas for LMI housing development, and references to Bristol’s zoning ordinance and historic preservation standards.

H16. Create **design standards for infill development** of multi-family housing to help them blend into the character of existing residential neighborhoods.

Infill development means building on underutilized or unutilized lands within an existing developed area. For example, if someone were to build a triple-decker house on an abandoned lot between several triple-decker houses on a street, they would be practicing infill development.

H 17. The Town will work with local homeless agencies to **track homeless individuals** or families who may have resided within the Town and try to connect them with support services.

Organizations the Town could work with include: the Rhode Island Veterans Home, East Bay Coalition for the Homeless, Riverwood Mental Health Services, and East Bay Community Action Program.

H18. Mitigate the effects of **Short-Term Rentals** on housing market competitiveness.

The Town could bolster its registration process for short-term rentals in order to better track their locations and understand their impacts (being sure short-term rental permits are tracked separately from year-round, longer-term rentals). Where short-term rentals prove to have a negative impact on year-round rental housing, particularly for working class and middle class residents, consider requiring longer-term leases (12 months or more).

H19. Allow more diverse housing types in more zones. For example . . .

- Allow up to four-family dwellings in the R-8 and R-10 districts.
- Allow two-family dwellings in the R-15 within a ½ mile walking radius of any commercial or mixed-use zoning.
- Explore zoning options for allowing clusters of small-scale cottages or “tiny homes” on single parcels.

H20. Explore more options for **Senior and Accessible Housing** that would allow seniors to downsize from their single-family homes. Explore requirements for universal design and accessibility in new construction or major renovations.

H21. Explore establishing a **Community Housing Land Trust** where the Town or a non-profit owns the land while the homeowner owns the home. This would reduce the price of a home by removing the land value.

H22. Proactively foster **Local and Regional Partnerships** and regularly meet with partners to learn from each other. Communities all over the state and New England are dealing with the same issues.

H23. Amend and reinstate the Town's former **Inclusionary Zoning** policy that certain developments must provide a percentage of new residential homes as LMI. Inclusionary zoning should apply to any development of five or more units and at least 15% of units should be LMI. (See LMI Housing Strategies for greater detail.)

H24. Encourage the Development of **Accessory Dwelling Units** (ADUs).

ADUs refer to smaller independent residential units that are on the same lot as a single-family home. At a minimum, the Town will comply with all state laws related to ADUs, and will consider allowing them even more broadly.

In addition, the Town will establish a financial mechanism to provide an incentive for owners of ADUs to deed restrict them as LMI housing. (See LMI Housing Strategies for greater detail.)

H25. The Town will continue to track **tax sale properties** as they become available and will consider acquiring appropriate properties and then working with local non-profit developers to renovate them as needed and then deed restrict them for LMI housing. (See LMI Housing Strategies for greater detail.)

Note: Once Town staff and the Planning Board are comfortable with a final set of actions, HW will prepare an amended implementation matrix with responsible agencies and time frames.