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SPOTLIGHT ON AFFORDABLE HOUSING

SUMMARY

Securing housing that is affordable continues to be a challenge for almost half the citizens of Sonoma County. Providing housing options for working families who are well below the median income requires public subsidies. Funding sufficient development to meet the needs of this population and curb the intense upward pressure on rents would require new public investments in excess of \$40 million per year. Without significant realignment of current County and city budgets, such sums are simply not available.

In order to increase the housing supply, the County and its cities will have to aggressively promote private sector development. Changing fee structures and improving the permitting process will help private developers include affordable housing in their projects. At the same time, the County and the cities need to prioritize accessing new federal and state subsidies for these housing developments. The Sonoma County Civil Grand Jury learned that the County and the City of Santa Rosa are considering a wide range of policy choices that, if implemented, will eventually begin to increase the supply of housing in the County. Absent new funding, expediting adaptive re-use of County/City owned properties such as Chanate Hospital, Los Guilicos and the underutilized County Administration campus appear to be logical priorities.

BACKGROUND

Communities throughout Sonoma County are grappling with the challenge of housing costs that are increasingly prohibitive for a significant portion of the population. The recession of 2008 resulted in a severe slowdown in construction and renovation that aggravated the imbalance in the supply and demand. In short, without sharing living quarters, working multiple jobs, accepting substandard conditions or commuting long distances, housing affordability is simply out of reach for many citizens of the County. The impact, especially on work force residents, has been profound and has the potential to erode the fabric of our communities. The Grand Jury investigated the mechanisms that could increase the supply of affordable housing to see if there are specific steps that local jurisdictions can take to materially improve the situation.

METHODOLOGY

Between September 2015 and April 2016, members of the Grand Jury conducted more than twenty interviews. These included representatives of the following agencies: the Board of Supervisors; the Community Development Commission (which acts as Housing Authority for all jurisdictions in the County except the City of Santa Rosa); the Permit and Resource Management Department; the Santa Rosa Housing Authority, the Santa Rosa Planning and Economic Development Department and the Petaluma Housing Division. Jurors also interviewed non-profit housing advocates, non-profit housing providers, and both local and

national for-profit real estate developers. Jurors researched numerous publications and online resources related to housing, housing finance, zoning, permitting and construction.

DISCUSSION

Affordability in Sonoma County

The conventional measure of affordability is that a family should not pay more than 30 percent of its monthly household income for housing costs. By this standard, Sonoma County ranks as one of the least affordable housing markets in the United States.

According to the 2015 "Out of Reach" Report published by the National Low Income Housing Coalition, 74,000 households, representing 40 percent of the County, are renters. According to the same report, the countywide estimated average rental cost for a two bedroom apartment is \$1,370 (many press reports put this figure as high as \$1,600). In order to not exceed the 30 percent of income threshold for housing costs, one full-time worker would have to earn \$26.35 per hour to afford the average county rent. A household with two wage earners would require average hourly wages in excess of \$13 per hour to afford the average rent. The state minimum wage is currently \$10 dollars per hour.

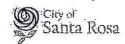
On December 15th, 2015, the Sonoma County Board of Supervisors passed a living wage ordinance covering employees of certain companies that contract with the County. Over time, the ordinance will raise the minimum wage to \$15 per hour for employees of these contractors. While this ordinance covers only 1,100 workers it is an important step. On April 4, 2016, Governor Brown signed Senate Bill 3 which gradually raises the statewide minimum wage to \$15 per hour by 2022. It is important to note, however, that the Governor retains the option to delay wage increases should economic conditions warrant.

Another barometer of the housing crisis is the waiting list for rental assistance from the Housing Choice Voucher program commonly referred to as Section 8 housing vouchers. The Section 8 program offers a monthly subsidy that bridges the gap between what qualifying low-income workers can pay and the actual market rent. Currently 10,000 local applicants, and twice that number of out-of- state applicants, have met the criteria to qualify for the program and are on the waiting list. Only about 300-500 rental units become available each year, leaving the vast majority of eligible Section 8 recipients unable to find housing within the program and having to share housing, accept substandard housing, become a commuter or leave the county.

In the past, the primary source of subsidies for construction of affordable housing came from local redevelopment agencies. These agencies created special redevelopment zones that attracted financing for new commercial and residential development. These redevelopment zones generated new tax revenues. Taxes in excess of those collected prior to the creation of the redevelopment zone were distributed directly to the redevelopment agency. By law, 20 percent of this incremental tax revenue was reserved for investment in affordable housing. Redevelopment agencies were ended in 2012. As a result, Sonoma County and the City of

Santa Rosa lost approximately \$6 million and \$4 million, respectively, of annual funding for affordable housing. This loss represents between 150 - 200 units per year of housing intended for Extremely Low and Very Low Income households.

The table below, produced by the Santa Rosa Housing Authority in 2015, covers the City of Santa Rosa but is representative of the situation throughout the County.



Affordable Housing Categories

43 percent of the City's households are below
80 percent of median income

| Average Household Income Category | Family-Income Range | Maximun Affordable Rent | Maximum Affordable Sale Price | Existing Households | |
|--|----------------------|-------------------------------|-------------------------------------|---------------------|------------------------|
| | | | | Estimated Number | Percentage of Total |
| Extremely Low Income (< 30% Median) | <.\$24,780 | \$620 | N/A. | 8,185 | 13,% |
| Very Low Income (30% to 50% Median) | <:\$41,300 | \$1,030 | \$132,700 | 7,605 | 12% |
| Low Income (50% to 80% Median | \$41;300 to \$65,000 | \$1,625 | \$215,500 | 11;410 | 18% |
| Moderate Income | \$65,000 to \$99,100 | \$2,480 | \$345,280 | . 12,495 | 20% |
| Above Moderate Income (1) | >,\$99;100 | > \$2,480 | >:\$345,280 | 22,870 | 37% |

The cost of housing is a challenge for many families but, as shown above, for Extremely Low and Very Low Income families it is simply out of reach without financial support. This table is based on 'family income' and reflects wages of two or more members of the household.

The private sector cannot build housing that is affordable to Extremely Low and Very Low income families without public funding. Limiting the rent charged makes a unit worth less than the cost of building that unit. Thus there is a funding gap between the cost of the building and its value that must be subsidized. Federal grants and tax credit programs account for as much as 75 percent of the funding gap. The balance must come from local jurisdictions. The Santa Rosa Housing Authority estimates that locally provided subsidies range from \$48,000 to \$60,000 per unit. The size of the funding gap becomes clear when one looks at the total number of new affordable housing units the Association of Bay Area Governments (ABAG) has allocated to Sonoma County. This allocation target is called the Regional Housing Needs

Allocation (RHNA) and is part of a statewide program to track whether housing availability keeps pace with population growth.

The local funding required to meet the RHNA target for the city of Santa Rosa is \$155,764,634 for eight years. This equals roughly \$19 million per year compared to Santa Rosa's historical annual spending of \$5.6 million and results in a shortfall of \$13.4 million. Petaluma estimates a shortfall of \$7.7 million per year with respect to its RHNA allowance. The County as a whole faces similar shortfalls in public funding for the affordable housing developments suggested by the RHNA.

County and City Actions Affecting Affordable Housing Development

County and municipal policies covering affordable housing are outlined in the Housing Elements of their respective General Plans. These plans provide roadmaps for growth and development that promote affordable housing construction. Below are examples of some of these policies.

Density Allowances: All jurisdictions provide for "density allowances" that enable a developer to increase the number of units that can be built on a property. To be eligible, a certain percentage of the units, rented or sold, must be affordable to specific income groups. For example, on a parcel zoned for twenty units a developer may be allowed to build thirty units. The extra ten units equal a density bonus of 50 per cent. A developer can build the additional units provided he limits the sale or rental prices of at least 30 percent of the total number of units in the project (nine of thirty) to levels that are affordable to households in the Low Income category.

Fees: The Grand Jury compared Sonoma County building fees to those in other Bay Area cities and found the County's to be higher than many neighboring jurisdictions. Private sector developers whom we interviewed highlighted fees ranging from \$50,000-80,000 per dwelling as a major barrier to increased building activity. Fees are referred to as 'impact fees' because they attempt to recover the increased associated costs of community services (fire protection, traffic, police, parks). Fees are traditionally charged on a per - unit basis This practice has the unintended consequence of penalizing smaller, higher density units and encouraging large single family dwellings. The developer of four small units selling for \$400,000 each or \$1.6 million total might pay \$200,000 in fees while a builder who builds a 4,000 square foot mansion selling for \$1.6 million could pay only \$50,000 in fees.

By making it more profitable to build large houses, both builders and policymakers acknowledge that the current fee formula promotes construction of large single family dwellings. The County and the City of Santa Rosa are reconsidering the method of calculating fees. The California Environmental Quality Act (CEQA) mandates that all developments consider their community impact. Thus efforts to reform fee calculations must be carefully crafted so as not to violate CEQA rules. The County plans to conduct a study to justify such changes so that they will comply with CEQA.

Fast Track Approval: Most General Plans call for 'fast track' approval processes for affordable housing projects. City and County officials are keenly aware that uncertainty surrounding the process of, and delays in, obtaining permits increases developer costs. Both the County and the City of Santa Rosa permitting departments are attempting to streamline and simplify the permitting process. In practice, the complexity of larger developments can and does derail these good intentions. Early in our investigation we could not find a private developer satisfied with the progress made in either Santa Rosa's or the County's approval processes. Several industry-wide efforts to correct this problem have produced recommendations for improvements. None has been successfully implemented. It was not the intent of this investigation to address this issue, but the lack of fast track implementation is an important bottleneck that impacts the overall supply and demand for housing countywide. Santa Rosa and the County are taking steps to streamline their processes.

Rent Control: Rent controls are often cited as a serious measure to address soaring rental prices. While rent control may provide temporary relief, many economists argue that such restrictions can inhibit new building and reduce maintenance levels of existing rental stock. Imposing rent controls would also require establishing an enforcement mechanism. With limited budgets, it might be more productive to invest in improving code enforcement rather than investing in a new bureaucracy. It is unclear to the Grand Jury how rent control effectively addresses the underlying shortage of housing. This view is echoed in the California State Legislative Analyst's 2016 Report entitled Perspectives on Helping Low Income Californians Afford Housing.

Inclusionary Zoning Versus 'In Lieu' Fees: In 2016 the United States Supreme Court allowed a California Supreme Court's decision to stand, which upheld the use of Inclusionary Zoning laws. Inclusionary Zoning requires developers of more than twenty housing units to market 15 percent of those units at affordable rates. Inclusionary Zoning is therefore a tool that the County and cities will continue to use to promote affordable housing construction.

In the past, developers have had the option to pay fees instead of actually building the affordable units. In theory, these 'in lieu' fees are used in partnership with non-profit housing developers to build affordable housing. There is rarely a direct accounting trail linking 'in lieu' fees to actual construction of affordable housing, making it difficult to track the effectiveness of these fees. The City of Santa Rosa is currently studying the possibility of raising 'in lieu' fees to dissuade developers from paying their way out of the obligation, forcing them to build and market lower cost housing. Raising fees in order to increase private sector building is counterintuitive. The Supreme Court's validation of inclusionary zoning laws has increased our jurisdiction's leverage to induce the private sector to build affordable housing

Fighting "Not in My Backyard" (NIMBY) Obstruction: Public complaints can derail projects that meet all local zoning requirements. Recent approval of housing on North Street in Santa Rosa is an example of a project that neighbors challenged even though it met all existing zoning and building code requirements. Elected officials can be tempted to mediate such disputes, but, in doing so, they undermine the General Plan and the ability of the planning department to promote private sector development. City and County planners cannot attract developers if the rules of the game are going to be rewritten as part of the process. The appropriate time to challenge zoning and defend neighborhood character is during the periodic review of the General Plan. Large scale developments that include affordable housing, meet existing zoning requirements, and comply with all other codes, merit expedited approval without being derailed by NIMBYism. The 1982 Housing Accountability Act has repeatedly been upheld by the courts. Sometimes called the Anti-Nimby law, this act makes it illegal to force developers to decrease the number of units in a proposal that otherwise complies with all local zoning and codes.

Area Specific Plans (ASP): Developers frequently cite the delays and complexities of complying with CEQA as a major impediment to getting homes from planning to permit. County and city planners can create Area Specific Plans that pre-qualify a project area for development. Once an ASP has been approved CEQA obligations have been met thus making parcels within the ASP more attractive to developers. Our investigation disclosed numerous instances where housing development was stymied by CEQA challenges. This 1970 law is a major impediment to housing development throughout California. CEQA has prevented rampant development, but it has become a blunt instrument in need of reform. Advances in conservation techniques should, for example, allow Sonoma County to develop a countywide plan to preserve the tiger salamander. This could be more effective than repeated CEQA challenges that discourage and delay needed housing projects. Absent such reform, ASPs are the only way that the County and cities can eliminate this risk factor for developers

Building Homes and Homelessness: Any discussion of housing affordability must mention homelessness. Assisting the chronically homeless is part of the overall equation of housing supply and demand and thus has an impact on housing affordability. This is particularly true with respect to use of public funds. In 2015, the County Board of Supervisors voted to adopt, as priority policy, the Sonoma County Community Development Commission report Building Homes: A Policy Maker's Toolbox for Ending Homelessness. This report presents a series of policy tools and regulatory steps that fulfill the goal of eradicating homelessness in Sonoma County. The central premise of Building Homes is that the investment required to shelter the 2,000-4,000 chronically homeless people in Sonoma County by 2025 will yield a significant savings in reduced health care, emergency services, jail stays and mental health services. Nevertheless, the estimated net cost of implementing all the Building Homes recommendations is \$11 million per year over ten years. Although the Board of Supervisors has endorsed

Building Homes, it is unclear that this endorsement will translate into budget allocations.

County/City Owned Surplus Property: The County and most cities within the County own property that is either abandoned or underused. In addition, the County faces a maintenance backlog estimated to be \$70 million over the next five years. Abandoned properties, like the hospital on Chanate Road or the Los Guilicos facility adjacent to the new Juvenile Justice Center, represent significant opportunities to negotiate for affordable housing commitments from developers. The Los Guilicos property, with current maintenance costs in excess of \$700,000 per year, has significant residential and recreational potential if developed. The County Administration Campus offers significant redevelopment potential that could also yield savings in County office costs. Similarly, the City of Santa Rosa has thirty vacant parcels that possibly could be used for affordable housing. The City of Petaluma has two such parcels.

Private Sector Role in Creating Affordable Housing

Without significant new public funding for affordable housing, the private sector must be encouraged to add supply to the housing market. There are several ways to promote private construction efforts:

Developers, both for-profit and non-profit, using only existing density bonus allowances, can and do build housing with up to 30 percent of the units with affordability restrictions. These units would meet the needs of Low and Moderate Income residents. However, because of delays in obtaining permits, many builders prefer not to attempt such developments. One frustrated developer has abandoned projects on several suitable properties because of permitting delays and uncertainties.

The Land Trust Model, buying land and holding it in trust for the benefit of the community, effectively removes the cost of land from the equation. By partnering with for-profit developers, Land Trusts help bridge the funding gap and encourage construction of affordable housing. A Land Trust retains ownership of the land to assure permanent affordability. This model has been successfully used in the County.

Individual Home Owners play both positive and negative roles in the supply and demand for all types of housing. On the negative side, vacation rentals take supply off the market. The impact of vacation rental properties on housing supply is difficult to assess. In today's market, with a 1 percent vacancy rate, shifting even a small number of houses from long-term leases to vacation rentals can increase rental prices for the remaining supply.

Private home owners could also have a positive impact on availability of alternative housing in the County. Vancouver, British Columbia loosened its zoning and permitting requirements covering accessory dwelling units (granny units) and saw over a thousand

of these units built in a short period of time. Cities in our County have differing rules covering additions of this type. In some cases, like Santa Rosa, fees on the order of \$23,000 per granny unit may be prohibitive. Nevertheless, accessory dwellings represent an opportunity to quickly increase supply and diversity of housing options.

Similarly, Shared Housing and Resource Exchange (SHARE) of Sonoma County, which began in 2014, attempts to match the growing number of older County residents living in larger homes with tenants. SHARE is modeled after a program in San Mateo County that has matched more than 1,000 homeowners with tenants since it began. The County is drafting amendments to its zoning rules to permit this practice.

New Sources of Funding

Affordable housing development for Extremely Low and Very low income residents requires leveraging local grant funding *plus* County or city concessions to obtain federal tax credits. Since the end of Redevelopment Agencies, and barring new general fund outlays, there are no significant sources of supplemental funding for the construction of housing. Federal funds are limited to the Federal Housing and Human Development Agency (HUD) administered programs such as Community Development Block Grants (CDBG) and HOME Investment Partnerships Program (HOME). These programs annually yield about \$2 million in awards that are allocated to various programs across the County. According to 2015-16 allocations, only \$612,721 out of the \$2 million is committed to actual new construction. The balance is committed to Americans with Disabilities Act (ADA) compliance upgrades, homelessness services and maintenance of existing affordable units. While the current funding picture is limited, there are important sources of funding that may be available to cities and the County, such as:

Cap and Trade Funds: California's Cap and Trade law created an auction market for carbon credits. Companies that do not want to invest in factory improvements to reduce carbon emissions can buy carbon credits. The funds generated by the purchase of carbon credits have been reserved by the State, in part, to subsidize "Transit Oriented Development". The goal is to encourage development around transit hubs to increase the use of mass transport. The opening of the Sonoma Marin Area Rapid Transit (SMART) train will create the opportunity for communities along the rail line to compete for grants from these 'cap and trade' funds. The State has started a competitive bidding process and anticipates that \$200 million per year will be awarded under this program.

Surplus Land Sales: California Assembly Bill 2135 (AB 2135) amended the State Surplus Land Statute to permit the sale of public land at below market rates. The City of Santa Rosa and the County control numerous properties that are unused or underutilized. Since land acquisition represents an important component of housing development cost, AB 2135 permits the County or City to discount the sale of land in exchange for affordability restrictions on the dwellings that would be constructed there. The County could take advantage of this legislation in their efforts to redevelop the recently vacated hospital site off Chanate Road in Santa Rosa.

New types of Redevelopment Areas: California Assembly Bill 2 (AB 2), signed into law on September 22, 2015, allows for the creation of Community Revitalization and Investments Areas (CRIA). These are similar to the now ended Redevelopment Zones. The criteria for creating a CRIA are so stringent that they will likely preclude all but a few of the poorest neighborhoods in the County from this new designation. If CRIA eligibility can be established, these neighborhoods will function in the same way they did under redevelopment. Incremental tax revenues will be directed to local control and 25 percent of these monies will be reserved for affordable housing.

Another recent California law, Senate Bill 628, amends Title 5 of the Government Code to allow for the creation of Enhanced Infrastructure Financing Districts (EIFD). Such EIFDs will be allowed to capture incremental tax revenues generated from improvements constructed within the district. The purposes of the EIFD are restricted but include affordable housing development.

National Housing Trust Fund: The two federal mortgage finance companies, Fannie Mae and Freddie Mac, collect a small fee on every mortgage transaction. A portion of this fee is designated for the National Housing Trust Fund to support affordable housing construction and rehabilitation nationwide. Following the 2008 recession these funds were restricted. With the economic recovery, they are scheduled to be released and California could receive as much as \$89 million annually.

Building Homes and Jobs Act: Pending California Assembly Bill 1335 (AB 1335) proposes a \$75 fee on real estate transactions. Some monies raised from this fee would be reserved for housing. If passed, the Bill will raise as much as \$300-\$400 million annually of which 20 percent would be designated for workforce housing and 10 percent for farmworker housing. The remainder would be used to match funds placed in a local or regional housing trust fund. When our investigation began, few agencies in the County had officially supported this bill. We are pleased to report that both the County and the City of Santa Rosa have done so.

The Community Reinvestment Act (CRA): The CRA states it "...is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate." Along with direct lending activity, financial institutions may fulfill their obligations under this Act by investing in special purpose Community Development Entities (CDEs), which facilitate capital investments in low to moderate income communities. County officials have indicated an interest in forming public/private partnerships with local financial institutions to encourage such CDE investments in Sonoma County.

Without unrealistic sums of public funds, increasing the supply of affordable housing will be a long-term challenge for Sonoma County. Elected officials and administrators should focus on

those policies that can accelerate construction of all types of housing and on building consensus for those policies.

FINDINGS

- F1. The downturn in new home construction following the recession, combined with low vacancy rates, high rents, wage stagnation and the desirability of Sonoma County as a place to live or vacation, has resulted in systemic undersupply of housing of all types.
- F2. The end of redevelopment agencies reduced funding for affordable housing by \$10 million annually between the County and City of Santa Rosa.
- F3. Increasing the supply of affordable housing is dependent upon budgeting priorities because a \$48-\$60,000 local subsidy is required for every unit of Very Low and Extremely Low Income Housing.
- F4. The County would need to invest \$40 million annually to ensure adequate development of affordable housing for Very Low and Extremely Low Income Housing.
- F5. Density bonus allowances make it possible for private sector developers to build Low and Moderate Income housing without public subsidies.
- F6. Private sector developers, including individual homeowners with granny unit potential, are often stymied in their efforts to pursue development opportunities due to high unit-based permitting costs, long bureaucratic delays, neighborhood opposition and CEQA compliance.
- F7. Area Specific Plans can accelerate the development approval process and would facilitate private development.
- F8. New or untapped sources of public and private monies are accessible to jurisdictions within the County.
- F9. The impact that vacation rentals have on the overall supply of housing in the County is difficult to quantify.

RECOMMENDATIONS

The Grand Jury recommends that:

- R1. The Sonoma County Permit and Resource Management Department and the City of Santa Rosa Planning and Economic Development Department reduce impact fees where possible by changing from per unit to per square foot calculation and prioritize working with forprofit developers by continuing to improve permitting turnaround time (F5, F6).
- R2. The City of Santa Rosa Planning and Economic Development Department and the Petaluma Planning Department encourage construction of granny units by reducing permit fees and zoning restrictions (F6).

- R3. The Sonoma County Board of Supervisors, City Council of Santa Rosa and City Council of Petaluma improve regulation and oversight of vacation rental activity in order to determine how rental rates are affected by having long-term rentals removed from the market (F9).
- R4. The Sonoma County Board of Supervisors, City Council of Santa Rosa and City Council of Petaluma develop appropriate tax and fee schedules to offset the impact of short-term vacation rentals on housing supply (F9).
- R5. The Sonoma County Community Development Commission and the Santa Rosa Housing Authority take necessary steps to pre-approve building sites with maximum density allowance to take advantage of transit-oriented development grants available from Cap and Trade funds (F 4,5,8).
- R6. The Sonoma County Board of Supervisors, Community Development Commission and Santa Rosa Housing Authority prioritize the development of new sources of affordable housing funding by supporting the passage of AB 1335, applying for grants from the National Housing Trust Fund and creating Community Revitalization and Investment Areas or Enhanced Infrastructure Financing Districts (F8).
- R7. The Sonoma County Board of Supervisors coordinate with local and regional financial institutions to discharge their Community Reinvestment Act obligations by investing in affordable housing efforts (F8).
- R8. The Sonoma County Community Development Commission and the Santa Rosa Housing Authority expedite formation of Area Specific Plans to facilitate private housing development (F7).
- R9. The Sonoma County Board of Supervisors, City Council of Santa Rosa and City Council of Petaluma consider invoking AB 2135 to donate surplus lands to Land Trusts or to sell these properties at below market rates to developers in exchange for commitments to include affordable housing (F7,8).

REQUIRED RESPONSES

Pursuant to Penal Code Section 933.05, the Grand Jury requires responses as follows:

- R1. The Sonoma County Permit and Resource Management Department, the City of Santa Rosa Planning and Economic Development Department
- R2. City of Santa Rosa Planning and Economic Development Department, Petaluma Planning Department
- R3. Sonoma County Board of Supervisors, City Council of Santa Rosa, City Council of Petaluma
- R4. Sonoma County Board of Supervisors, the City Council of Santa Rosa and the City Council of Petaluma

- R5. Sonoma County Board of Supervisors, Community Development Commission, Santa Rosa Housing Authority
- R6. Sonoma County Board of Supervisors, Sonoma County Community Development Commission, Santa Rosa Housing Authority
- R7. Sonoma County Board of Supervisors
- R8. Sonoma County Board of Supervisors, Sonoma County Community Development Commission, Santa Rosa Housing Authority
- R9. Sonoma County Board of Supervisors, City Council of Santa Rosa, City Council of Petaluma

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North Bay Biz: Cost of Living Article

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The 1982 Housing Accountability Act

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Urban Land Institute: 10 Principles for Developing Affordable Housing

Reports issued by the Civil Grand Jury do not identify individuals interviewed. Penal Code Section 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Civil Grand Jury.