



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

July 2, 2025

Karen Witherspoon, AICP, Senior Project Planner
Lewis County
Community Development
2025 Northeast Kresky Avenue
Chehalis, WA 98531

Dear Karen Witherspoon:

Thank you for the opportunity to comment on the determination of non-significance for the Roamers RV Park Project (SEP25-0013) located at 676 North Military Road as proposed by Andy Royer and Danielle Peters. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SOLID WASTE MANAGEMENT: Derek Rockett (360) 995-3176

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

**WATER QUALITY/General Permit Unit:
Jacob Neuharth (360) 706-4599**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Discharges must not cause or contribute to a violation of surface water quality standards, groundwater quality standards, sediment management standards, and human health-based criteria. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

If there are known soil/ground water contaminants present on site, additional information will be required to be submitted. For contaminated construction sites, contact Evan Wood at evan.wood@ecy.wa.gov, or by phone at (360) 706-4599.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State.
 - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that
 - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
 - b) Reasonably expects to cause a violation of any water quality standard.

Applicants may apply online or obtain an application from Ecology's website at: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Construction-stormwater-permit>. Some projects may be eligible for coverage under an Erosivity Waiver. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(JKT:202502426)

cc: Derek Rockett, SWM
Jacob Neuharth, WQ

Karen Witherspoon

From: Stone, Jessica (DAHP) <jessica.stone@dahp.wa.gov>
Sent: Thursday, July 3, 2025 11:26 AM
To: Karen Witherspoon
Cc: PermitReview; sdinubilo@squaxin.us; Brad Beach; dpenn@chehalistribe.org; Casey Barney
Subject: RE: SUP25-0002 / SEP25-0013 Roamers RV Park (DAHP 2025-07-04230)

Follow Up Flag: FollowUp
Flag Status: Flagged

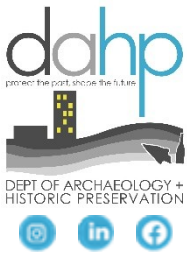
You don't often get email from jessica.stone@dahp.wa.gov. [Learn why this is important](#)

Dear Karen,

Thank you for contacting the DAHP regarding the above-referenced project. Because a portion of the project location is in an area marked "Very High Risk" for encountering archaeology by our Archaeological Risk Assessment model, we recommend that an Inadvertent Discovery Plan (IDP) be created and kept on site.

Please also note that I have assigned DAHP Project Tracking Number 2025-07-04230 to this project. Please include this number with any future related correspondence.

Thanks, and please let me know if you have any questions,
 Jessica



Jessica Stone, Ph.D (she/her)
 Assistant State Archaeologist

Email: jessica.stone@dahp.wa.gov | www.dahp.wa.gov

Cell: (360) 890-2633 | Main Office: (360) 586-3065

Hours: 7:30-4:00 PST Monday-Friday

Physical Address: 1110 S. Capitol Way, Suite 30, Olympia, WA 98501

Mailing Address: PO Box 48343, Olympia, WA 98504-8343

From: Megan Sathre <Megan.Sathre@lewiscountywa.gov>
Sent: Monday, June 16, 2025 1:11 PM
Cc: Karen Witherspoon <Karen.Witherspoon@lewiscountywa.gov>
Subject: SUP25-0002 / SEP25-0013 Roamers RV Park

External Email

Greetings,

Lewis County has received a SEPA checklist for a 57 site Recreational Vehicle Park (RV Park) in two phases. The information is being forwarded to you for review and comment.

All documentation relating to this project can be found here:

<https://lewiscountywa.gov/departments/community-development/current-planning-applications/sup25-0002-roamers-rv-park/>. The lead agency is Lewis County and the issue date of the DNS is June 18, 2025.

Please review the documents and **make all comments to Karen Witherspoon**, Senior Project Planner, Lewis County Community Development at Karen.witherspoon@lewiscountywa.gov. Comments are due by 4:00pm on July 3, 3035.

Megan Sathre

Administrative Assistant

Lewis County Community Development

360-740-2677

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SUP25-0002 & SEP25-0013 Internal Reviewer Comments

File Number: SUP25-0002 & SEP25-0013

Date Printed: July 3, 2025

Public Works Department:

Access Review:

Any changes to the existing approach, such as an upgrade to a commercial approach, will require a Road Approach Permit. This project will require a commercial road approach and new permits.

Survey Review:

Private and public survey monuments shall be maintained and replaced if destroyed per WAC 332-120-040.

Survey monuments exist along the north and south lines of this parcel per Surveys recorded under AFN 3562673 and 3158542. The proper monument removal form will need to be recorded with the Public Land Survey Office by a licensed Land Surveyor if any of these monuments are to be removed or destroyed.

Roads/Utilities Review:

Interior roads shall be consistent with Fire Marshal/ Building Official comments.

Stormwater Review:

Stormwater shall be in accordance with 15.45 of the Lewis County Code.

Traffic Review:

No comment at this time.

Community Development Department:

Fire Marshal/ Building Official Review:

Fill and grade permit and stormwater permit required for proposed access roads, All internal roads shall be designed and constructed for fire apparatus and EMS access per the 2021 IFC.

each site/place shall have an identifying number or letter

approved water and septic shall be provided

permits shall be obtained for all buildings, Current codes are 2021 ICC Building and 2021 Uniform plumbing

Public Health & Social Services Department:

Water Review:

Well site inspection is satisfactory with correctable condition (WS25-00016). Approval of a well site or preliminary site plan does not constitute or imply approval of the proposed water system. Approval of the water system is contingent upon the water system construction and management plan meeting rules and regulations of the State of Washington.

The proposed use requires Group A public water system design approval by the Washington State Department of Health Office of Drinking Water (ODW) under WAC 246-290 prior to Lewis County site development approval and use. Please contact ODW engineer, Phyo Kyaw, for further information on requirements for completion of well site and system approval at 564-669-3849.

Septic Review:

Per previous review by Beau Williquette, the septic system will require State of Washington approval, not County septic permits.

06/24/2025

Stuart and Polly MacKenzie
689 N Military RD
Winlock, WA 98596
360.219.8709/winlockcoed@yahoo.com

Karen Witherspoon, AICP Senior Project Planner Lewis County Community Development
125 N Chehalis Ave. Chehalis, WA 98532
karen.witherspoon@lewiscountywa.gov

Re: Opposition to Special Use Permit SUP25-0002 – Proposed RV Park at 676 N Military Road

Dear Ms. Witherspoon:

This commentary is being written in opposition to the afore listed Special Use Permit. Although it would seem that many issues have been covered, the impact of this request has a long term affect on the surrounding area, that if allowed to proceed, will be permanent and unforeseen problems will not be easily remedied. Below, is a list of problematic concerns that have not been fully addressed:

- Residential impact – special exemption from the current RDD-10 zoning restrictions, fundamentally changes the characteristics of this rural area that have been in place for decades. Adding a commercial property amongst farming and residential land, opens the door for other urban planning to take hold and further degrade the rural atmosphere, as well as privacy, current residents have expected when buying property in this area.

Also of concern, is the semi-permanent residency being allowed by the RV park owners. 210 days/7 full months is excessive in the idea of the permit applicant's view to use the site as accommodations for the benefit of visitors needing lodging for area special events.

- Infrastructure impact – North Military RD is a high-volume thoroughfare with current usage by residents. Farm and livestock vehicles are often seen, as well as school buses, and commercial vehicles for delivery services, 18-wheel semi-trucks and county maintenance vehicles, plus is used as a detour route for I-5 traffic when an accident happens between exit 68 and 65.

The roadway is narrow and lacking sufficient shoulders to accommodate a bigger influx of traffic as would be expected with a RV park. The site lines on the road are often limited in scope and do present added danger for moving traffic along with residents leaving their property to access the road. 60' RVs and any towing/towed vehicles compound this problem by their size and by how many will be on the road at any given time. These vehicles will be traversing either through populated homestead areas, or by way that will have them passing through a school zone.

- Environmental impact – Although geographic and land use studies have been done, with minimal DNR input, there is no definite calculations available to account for variables in use of water resources, sewage issues, non-compostable garbage generation with the effects on the surrounding community. Local fauna which was not included on the SEPA report should include bald eagle and heron populations sighted by many in the surrounding area. Other fauna to be considered is those of the scavenging type – raccoons, opossums, porcupines, and skunks – that are drawn to human waste products.

There is also no guaranteed way to stop noise pollution, especially in construction phase(s) that will carry for long distances. Pets travel with families, and are not easily kept quiet after 10 PM. Light and smoke pollution cannot be contained, either, to acceptable levels in standing with current rural expectations for peace and privacy.

- Financial impact – There is no discernable discussion of financial variables in this proposal. As stated by the permit requestors, this park will try to draw tourists and event participants to the Lewis County area. Due to the location of the proposed lodgings, it is reasonable to conclude that the cities of Winlock or Toledo will not see a large financial bump in their economies. Centralia and Chehalis stand to see more economic growth as that is where most events, recreational sites, and shopping are located.

Local residents, however, may see economic turmoil due to the proposal. The possibility of property values falling due to the un-residential nature of the RV park is valid assumption. The rise of property taxes is also a valid point. Costs of road repair/reconstruction, use of emergency/fire services, etc., all come from tax basis – which is now residential, but could be skewed by a commercial venture in the area.

The total complexity of this issue does not allow for all nuances and issues to be addressed in a comment document. There is definite reasoning to deny Special Use Permit SUP25-0002 without further research and discussion by all who will be affected by this proposal.

We look forward to ongoing dialogue in the Zoom meeting being planned.

Thank you for affording us this commentary,

Stuart and Polly MacKenzie

RECEIVED

By K. Witherspoon at 9:13 am, Jul 02, 2025

July 1, 2025

Karen Witherspoon, AICP
Senior Project Planner
Lewis County Community Development
125 N Chehalis Ave.
Chehalis, WA 98532
karen.witherspoon@lewiscountywa.gov

Re: Opposition to Special Use Permit SUP25-0002 – Proposed RV Park at 676 N Military Road

Dear Ms. Witherspoon,

We respectfully ask the County to deny the Special Use Permit for SUP25-0002, the proposed 57-site Recreational Vehicle Park at 676 N. Military Road in Winlock. We oppose this application for the negative impact it will have on the local area.

The proposed RV site in RDD-10 zoning, which we understand is one home per ten acres base density, will be a detrimental to this area. This project is contrary to rural residential and low impact uses under the existing zoning. We relocated to Lewis County for the rural character this area provides. We, like many of our neighbors have invested in this area and appreciate the quality of life that we have found. The introduction of this project will change the area - opening the door for urban sprawl commercial uses on rural land and potentially harming property values.

Further, the current infrastructure does not support such a large endeavor. The needed septic systems and access to aquifer water to support the increased property demand presents risks, including the possibility of contamination. Olequa Creek runs adjacent to the proposed RV park and has salmon spawning. Just counting on vegetation to prevent camper access to this critical area is not realistic. Also, N Military is a narrow two-lane road without shoulders and visibility limitations due to rolling terrain. This road was not designed to safely handle traffic volume or large RV vehicles turning into the park and onto N Military. With a project that provides for 57 RV sites, there will be impact not just on N Military to also to the surrounding streets.

We urge the County to deny the Special Use Permit for SUP25-0002.

Respectfully,



Joseph Grimm / Gloria Ibarra
170 Pilots Pasture
Winlock WA 98596
1jag.aviation@gmail.com

June 30, 2025

To: Karen Witherspoon, AICP
Senior Project Planner
Lewis County Community Development
125 N. Chehalis Ave. Chehalis, WA 98532
karen.witherspoon@lewiscountywa.gov

RECEIVED*By K. Witherspoon at 12:15 pm, Jun 30, 2025***Re: Opposition to Special Use Permit SUP25-0002 – Roamers RV Park Proposal**

Dear Lewis County Commissioners,

I am writing to formally oppose the Special Use Permit application SUP25-0002 for the proposed 57-site RV park at 676 N. Military Road in Winlock. I urge the commissioners to deny the requested change of zoning for the following reasons:

1. Environmental & Sanitation

Case studies across Washington have exhibited the issues RV parks often bring: risks to water quality and local watershed health, inadequate wastewater treatment, illegal dumps, and increased public health demands. Ongoing costs related to utilities and emergency services (ambulance, law enforcement) can burden the county and taxpayers without clear mitigation commitments from the applicant. Numerous public comments against RV parks cite flash pollution, trash overflow, and noise disturbances – notably impacting children, seniors, and wildlife. Without detailed plans for waste management, stormwater treatment, and creek setbacks, this project threatens Winlock's rural environment.

2. Traffic & Safety Impacts

The addition of 57 RV spaces will significantly increase vehicle traffic on local roads that have no shoulders. As demonstrated by residents opposing similarly sized parks in Cowlitz and surrounding counties, congestion and safety hazards often follow such developments – particularly during peak tourist seasons. Allowing RV's to remain on-site for 210 days (7months) at a time is not short-term.

3. Strain on Infrastructure & Broadband Endeavors

Lewis County is currently implementing a \$25.8 M fiber-optic broadband expansion in Winlock – aimed at serving over 2,300 homes and businesses with high-speed internet. Yet, an RV park of this scale could overtax sewage, water, electrical, and fiber systems – compromising both current residents and future town-wide internet access.

In conclusion, This proposal, as currently framed, introduces considerable risk to housing affordability, infrastructure stability, and public welfare. For these reasons, I respectfully ask the County to deny the Special Use Permit for SUP25- 0002.

Thank you for considering my reasons for opposing the proposal.

Sincerely,
Michelle Taylor
220 Sargent Road
Winlock WA 98596

Karen Witherspoon

From: TC H <tchvmax@gmail.com>
Sent: Thursday, July 3, 2025 2:28 PM
To: Karen Witherspoon
Subject: Comments on Type III SUP - Application Permit Number SUP25-0002 & SEP25-0013

Follow Up Flag: FollowUp
Flag Status: Flagged

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Dear Lewis County

Please see written comments regarding Application Permit Number SUP25-0002 & SEP25-0013 below.

There should have been a longer comment period for this applicatio, many in the local area were only made aware of this in the newspaper today. First request is to extend the comment period to adequately address the application.

General Concerns:

MSR24-0650 CONDITIONAL APPROVAL DECISION:

- Preston Pinkston, planner states This property is within or near land designated for long-term commercially significant resource use in which natural resource activities are permitted and encouraged etc. Has the planner taken into account that less than .75 miles from this property is a significant 60+ acre human waste biorecycling, cattle farms, pig farms, crop acerage with fertilizer, large chicken farms etc. The planner or the applicant have not mentioned that. What is the true intent of an RV park in this location? This is a rural area, there is no tourist draw to that location for the sweet smells of human waste and farm waste. The intent is not clear on the actual RV use and length of stay. Our concern is that the application does not honestly represent the intent. The application is lawful and complies, but the reality of the actual RV park is not fully represented in an open manner.

SUP25-0002 CARA Report

- Dates from nearby local wells and water supply average over 30 years old, howcis this data current to base an adequate and accurate analysis of impact to local water resources.

SUP25-0002 Trip Generation Memo:

- JTE Inc was conducted at a time when a large portion of North Military Road was closed and diversions were in place.
- JTE states 56 not 57 RV slots in the analysis and engineering portion
- JTE states N. Military is posted 40 MPH, the analysis was based on this. Posted speed is actually 50 MPH, thus negating all data used to derive future projections.

- JTE does not account for the closure of N Military to all traffic except local during their analysis timeframe, thus negating all data used to derive future projections.
- JTE did not account for the new heavy 18 wheeler trucking that is part of the newly opened distribution center on N Military since their analysis.

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July 2, 2025

Karen Witherspoon, AICP
Senior Project Planner
Lewis County Community Development
125 N Chehalis Ave.
Chehalis, WA 98532
karen.witherspoon@lewiscountywa.gov



Re: Opposition to Special Use Permit SUP25-0002 – Proposed RV Park at 676 N Military Road

Dear Ms. Witherspoon,

I am writing to state my opposition to Special Use Permit for SUP25-0002, the proposed 57-site Recreational Vehicle Park at 676 N. Military Road in Winlock, as this project will have a negative impact on the local area.

The proposed RV site in RDD-10 zoning is contrary to rural residential and low impact uses. I moved to Lewis County for the rural character in this area and appreciate the quality of life that exists here. Approval of a Special Use Permit will change this area and introduce urban sprawl commercial use on rural land. Neighboring families will see a detriment to quality of life and harming of property values.

Also, the current infrastructure does not support such a large endeavor. The needed septic systems and access to aquifer water to support the increased property demand presents risks, including the possibility of contamination. Of major concern is the safety impact on N Military Road. Without road shoulders or a designated turn lane into and out of the park, the risk of a collisions will be introduced. With a project that provides for 57 RV sites, there will be impact not just on N Military to also to the surrounding streets.

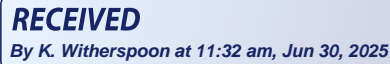
I respectfully request that the County deny the Special Use Permit for SUP25-0002.

Sincerely,

Maralyn Tuckness
162 Pilots Pasture
Winlock WA 98596
Maralyn.tuckness@gmail.com

Maralyn Tuckness
age 87

Kraig and Elaine Rinker
139 Ski View Drive
Winlock, WA. 98596



Lewis County Planning Commission
125 NW Chehalis Avenue
Chehalis, WA. 98532

RE: SUP25-0002-Roamers RV Park-57

July 28, 2025

To Whom it May Concern:

I am writing to express my serious concerns regarding the proposed RV park development adjacent to my property on 137 Pilot Pastures Road. I believe this development, a 57 lot RV park located at 679 North Military Road, would significantly impact our neighborhood's character, safety, and property values.

Research indicates that properties within a quarter-mile of RV parks can experience value depreciation of 10-20% depending on the park's maintenance and management. A study by the National Association of Realtors found that proximity to transient housing facilities can extend the average time a property stays on the market by 30-45 days. These statistics are particularly concerning as a homeowner who has invested significantly in this community.

Safety and security represent another significant concern. According to the National Crime Prevention Council, areas with transient populations typically experience a 15-25% increase in property-related crimes. Without clear policies regarding background checks and length-of-stay restrictions, this development could pose risks to our established residential community. This is particularly concerning as I have grandchildren who will live at this location.

Additionally, environmental impacts must also be considered. RV parks typically generate 2-3 times more waste per capita than permanent residences, and improper management can lead to

groundwater contamination and pest problems. The proposed location's proximity to residential areas makes these environmental concerns especially pressing.

I respectfully request that the Planning Commission:

1. Conduct a comprehensive impact study on property values and crime rates
2. Consider alternative locations further from established residential areas
3. If approved, establish strict guidelines for:
 - a. Maximum length of stay
 - b. Background check requirements
 - c. Quiet hours and traffic management
 - d. Environmental waste management
 - e. Regular property maintenance standards

Thank you for considering these concerns.

Sincerely,



Elaine Rinker

Cell: 360-485-8805

Email: Lanie44@rocketmail.com

Cc: Lindsay Pollock (via email: Lindsey.Pollock@lewiscountywa.gov)

Scott and Jill McNaught
290 Sargent Road
Winlock WA 98596
360-791-8607
onpointwithjill@gmail.com

6-23-2025

To:
Karen Witherspoon, AICP
Senior Project Planner
Lewis County Community Development
125 N Chehalis Ave.
Chehalis, WA 98532
karen.witherspoon@lewiscountywa.gov

Re: Opposition to Special Use Permit SUP25-0002 – Proposed RV Park at 676 N Military Road

Dear Ms. Witherspoon,

I am writing to formally oppose the Special Use Permit application SUP25-0002 for the proposed 57-site RV park at 676 N Military Road in Winlock. I urge Lewis County to deny this application based on the following concerns:

1. Incompatible with RDD-10 Zoning and Rural Character

This high-density RV park is inconsistent with the intent of RDD-10 zoning, which is meant to support rural residential and agricultural land use at low density (1 unit per 10 acres). The proposal—approximately 3 units per acre—introduces an urban-intensity use that undermines the rural setting, farming community, and quiet residential character of the area.

2. Strain on Infrastructure and Emergency Services

The site lacks connection to public water and sewer and would rely on private systems that may be insufficient to support peak occupancy. The project also relies on volunteer fire services, and the additional demand could compromise response capacity for existing residents.

Of particular concern is N. Military Road itself, which is a narrow, two-lane roadway with no shoulder, limited visibility, and rolling terrain. It is not designed to safely accommodate the increased traffic volume and large vehicles (RVs with trailers) that this project would generate. This raises serious safety concerns for both new and existing road users, including those operating farm equipment.

3. Risks to Critical Areas and Groundwater

The site includes a Type F stream and Category III wetland, both of which require 150-foot protective buffers. Even if structures stay outside these areas, the scope and density of use raise legitimate concerns regarding runoff, septic impact, and the potential degradation of nearby water resources.

In addition, the property lies within a designated Critical Aquifer Recharge Area (CARA), which plays an essential role in safeguarding regional drinking water supplies. Introducing high-volume septic

systems and RV hookups in such a sensitive area increases the risk of contamination and contradicts the precautionary measures outlined in Lewis County Code Chapter 17.38.

4. Excessive Density and Environmental Impact

The proposed development includes 57 RV sites, each with full hookups for water, sewer, and electricity. With additional parking for tow vehicles, group gathering areas, and possible tent camping, the actual number of occupants and vehicles could far exceed 57 RVs—potentially exceeding 100 vehicles during peak use. This level of intensity is not appropriate for a rural residential area and would significantly alter the character of the neighborhood.

Furthermore, the applicant proposes allowing RVs to remain on-site for up to 210 days at a time. This extended duration goes beyond short-term or recreational use and effectively creates a seasonal residential development—without the infrastructure or oversight required for long-term housing. Such extended occupancy increases cumulative wear on local roads, septic systems, and emergency services.

The size, density, and use profile of the proposed park will likely lead to increased noise, light, smoke, and traffic impacts. These are inconsistent with the quiet, low-impact use expected in rural residential and agricultural zones. Nearby farming operations may also be disrupted by the increase in non-agricultural traffic and activity.

5. Precedent for Urban Sprawl

This development sets a concerning precedent for permitting urban-style commercial uses on rural lands. Despite being presented as a limited RV park, the infrastructure and design encourage more intensive, future development that undermines the Comprehensive Plan's goals.

For these reasons, I respectfully ask the County to deny the Special Use Permit for SUP25-0002.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott and Jill McNaught", with a long horizontal flourish extending to the right.

Scott and Jill McNaught

In addition to the environmental and infrastructure concerns, the presence of a high-density RV park in a quiet rural setting has the potential to negatively affect property values of neighboring homes. Increased traffic, transient occupancy, and diminished rural character may reduce the appeal and market stability of surrounding residential properties, which is a legitimate concern for long-term homeowners and families who have invested in this peaceful farming community.