

Cook County Plan

Implementation

Implementing this plan will take time and a host of actions undertaken by the County alone and in concert with other public and private entities. This section of the plan first identifies a series of new or modified "tools" available for implementing elements of the plan. This is followed by a priority set of actions that the County should undertake to initiate implementation of this plan.

THE IMPLEMENTATION "TOOL BOX"

Many of the techniques for implementing portions of this plan are already available to Cook County and the other parties interested in the plan. Some of these tools, for example zoning, may need revision to better address plan goals and policies. Other tools and mechanisms may have to be built, enacted, or organized. Not all of these tools are the responsibility of the County although the County may have to initiate or encourage their use by the appropriate parties.

* Regulation

Tool Type: County ordinances adopted to regulate land use, protect public health and safety, and protect private investment.

Zoning and Other Land Use Based Ordinances: Regulations regarding location, type and intensity of land uses (also can cover signs, construction standards, etc.). Most are at the discretion of the County but state-mandated minimum standards apply in shorelands.

Subdivision Ordinance: Regulations governing division, dedication, and transfer of land.

Design Review: Regulations concerning the style of development, usually but not always, within designated districts.

Public Health Code: Regulations, generally based on state-mandated minimum standards, governing the provision of on-site sanitary collection and treatment, drinking water wells, and solid waste collection.

* Public Investment and Taxation

Tool Type: Direct and indirect use of County funds to accomplish public purposes.

Capital Improvement Program (CIP): An ongoing plan detailing annual County capital expenditures (e.g., roads, parks, buildings, major equipment purchases) and their sources of financing. An additional element can be an Operations Program that identifies long-term costs and funding for operating programs.

Land Ownership: The acquisition (through purchase, donation, trade) and management of land by the County to achieve plan objectives.

Economic Development Financing: A variety of direct and indirect public financing tools can encourage or support private development that achieves plan objectives. Among these are Tax Increment Financing, bonding, land and building leases, and revolving loan funds. Capitalization assistance for some tools may come from non-County sources.

Special Assessment Districts: Specific projects (e.g., roads, facilities, programs, services) may be supported through special, limited assessments on property or users within a specific geographic area.

Work to Resolve Property Tax Issues: The unwanted effects of Minnesota's property tax system on Cook County (e.g., an disincentive to provide lower cost or rental housing) can only be resolved through changes in legislation. The County can actively participate in efforts to devise a more equitable property taxation system.

*** Public Authorities**

Tool Type: Public, quasi-governmental entities organized to achieve specific, limited purposes operating in coordination with but not necessarily under the control of local government.

Range: Alone or in conjunction with other governmental units the County can establish public authorities to undertake one or more specific tasks on behalf of the County. One such authority, the Cook County Grand Marais Economic Development Authority, already exists. Others could be established for housing, the airport, or other enterprise activities.

*** Intergovernmental Coordination**

Tool Type: Voluntary, formal agreements between units of government to achieve mutual goals and objectives.

Memorandum of Understanding (MOU): The County executes agreements with local, state, federal or tribal governments regarding cooperative actions on specific land use and management topics.

Land Trades: The County can undertake land trades of its own and/or encourage land trades between other units of government to help achieve plan objectives.

Resource Sharing: The County can cooperate with other units of government to provide services, share equipment and buildings, and reduce duplication.

*** Private Initiatives**

Tool Type: Undertakings by citizens as individuals or organizations to achieve shared objectives.

Nonprofit Housing Corporation: The County can encourage the creation of a not-for-profit corporation and work with it to provide lower cost housing within Cook County.

Conservation Easement: Conservation easements provide a means for individual land owners to permanently restrict future development on their lands. Conservation easements serve to preserve views, secure wildlife and plant habitat, provide open space, and limit development

density.

Community Associations: The County can encourage and work with private organizations (e.g., lake associations, recreational activity groups) to deliver services, monitor resources, generate public participation, educate the public on land use and community issues, and the like.

*** Public Process**

Tool Type: Methods of making public decisions (involved in the use of nearly all other tools).

Planning: Formal efforts to prepare plans at the county or subcounty (e.g., community center) levels to define desired directions for land use, public investment (e.g., parks, roads), or land management.

Public Decision Making Processes: The means by which public decisions are made, including the degree of public participation in those processes, are tools that influence the decisions themselves and, more important, affect the confidence of the public in the decisions.

Leadership Development: A small community does not have the luxury of hoping that quality leaders step forward, there must be a concerted effort to foster leaders. Such efforts may include: creating a public decision making process that encourages civil debate and thus greater public participation, and providing opportunities for new leaders to emerge.

Conflict Resolution: The means by which controversial public processes are resolved preferably in ways that foster constructive, civil debate and that secures mutually satisfactory compromise solutions

*** Information and Education**

Geographic Information System for Public Decision Making: The County can enhance its GIS to achieve a variety of plan objectives including: data input and analysis for planning and zoning administration, organizing and analyzing monitoring information, and providing information and perspective on land use and management decisions.

Information Dissemination: The County can use various means to inform the general public about County processes, programs, projects, issues, and the like as a means to enhance informed debate and to encourage implementation of the plan without resorting to regulation or County funded actions.

Education: The County can work with resource providers (e.g., Cook County schools, Minnesota Extension) to establish a coordinated approach to the provision of opportunity for county residents to gain or enhance job skills and undertake business development (self-employed for example) as a specified means of achieving this plan.

ESSENTIAL ACTIONS TO IMPLEMENT THE PLAN

Implementation is a balance of desire and capacity and it will occur in increments—a series of small actions taken on several fronts will create significant impact over time. Cook County's ability to implement the plan is limited by time,

finances and human resources. Priority must be placed on undertaking those actions deemed capable of doing the most to implement the critical, core aspects of the plan. These essential actions are listed in detail below.

✓ ZONING and SUBDIVISION ORDINANCES

Responsible Entity: Cook County (Board of Commissioners, Planning Commission, Board of Adjustments, Office of Zoning and Planning)

Applications for Plan Implementation:

1. The plan may require creation of new districts or reworking of existing ones to accomplish such tasks as insuring low density in remote, inland areas and allowing mixed use village-like development patterns in designated community centers.
2. The plan may require coordinated revisions to the zoning and subdivision ordinances to encourage where desirable and permit greater flexibility and creativity in the design of subdivisions. Specifically, concepts such as "clustered" or "conservation" subdivisions need to be considered as means to foster desirable, lower cost residential development that preserves tracts of undeveloped land and which maintains the designated development density of the affected area.
3. The plan suggests that various forms of approved Best Management Practices for land management be included, referenced or otherwise incorporated into the ordinances.
4. The County may find it essential to conduct research (or obtain the results of such research) that seeks to establish the correlation between specific land use standards and the desired outcomes in the environment.

Cost Considerations:

There will be a minimum cost in staff and citizen time to review the existing ordinances for desired changes. This would be increased in outside assistance was sought. If changes are proposed, there will be costs for the public review and approval process including public meetings, publication of drafts, public notices, legal review, publication of the final ordinances, printing of new zoning maps, and possible changes to administrative forms.

✓ PLANNING / SUBAREA PLANS

Responsible Entity: Cook County for catalyst and support; local citizens in each area for undertaking the processes

Applications for Plan Implementation:

The plan suggests that detailed land use plans be prepared for subareas within the county. The likely process would be as follows: Cook County identifies the opportunity and concept with each community; a group of local citizens (Town Board or ad hoc committee) would assume responsibility for directing the planning effort with staff support from the County; either using

all local talent or paying for outside professional assistance, the local group prepares the plan; final approval of the plan rests with the County Board since much of the implementation would come through County authorities such as zoning, subdivision, and road development.

Cost Considerations:

There will be an initial cost in terms of time and some direct expense to conduct the first workshop on the concept. If planning processes are undertaken, there will be costs for meetings, citizen involvement, logistics and support, County staff time, and the like. If consultants are retained, there will be costs for their time. At the end there will be costs for plan publication plus any changes to County ordinances and maps.

✓	CAPITAL IMPROVEMENT PROGRAM
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Responsible Entity: Cook County

Applications for Plan Implementation:

The plan strongly suggests that Cook County devise an ongoing Capital Improvement Program governing all major County capital investments. This will require County departments to conduct joint sessions to design the format for the CIP and to input pertinent information. The County Board will have a major role in the process both by requesting the CIP and then adopting it on an annual basis.

The CIP can be augmented by a similar long-range view of operating programs. A combination of capital and operating programs will allow the County to better understand the resources available to it, the fiscal implications of decisions, and its capacity to implement those decisions.

Cost Considerations:

The cost for developing a CIP will be primarily staff time.

✓	NONPROFIT HOUSING CORPORATION
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Responsible Entity: Private parties

Applications for Plan Implementation:

The plan identifies the provision of housing across a wide range of household incomes as a key implementation concern but it clearly indicates that the County would not have a direct financial role in such efforts. The most likely strategy would be for the County to cooperate with such groups as the Cook County-Grand Marais EDA to conduct workshops on innovative approaches to housing development. One probable desired outcome would be the formation of a nonprofit corporation dedicated to the provision of lower cost housing. The County's ongoing relationship in housing development would be peripheral but might include providing land, cooperative development of roads, planning, revisions of regulations to facilitate desired development, and the seeking of funding sources available to or through units of government.

Cost Considerations:

Initial actions would only involve limited amounts of County staff time. It is possible that County-owned land might be used directly or indirectly (via

trades) for desired development. It is possible that additional staff time would be involved in planning efforts and grant writing.

✓	MEMORANDUM OF UNDERSTANDING REGARDING LAND TRADES
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Responsible Entity: Cook County

Applications for Plan Implementation:

Cook County should negotiate memoranda of agreement with the US Forest Service, Minnesota DNR and other units of government as may be appropriate to establish plans and procedures for facilitating land trades and then aggressively implement those plans. For instances where County-owned land is not involved, the County should be the catalyst encouraging desired trades to occur.

Cost Considerations:

Costs to Cook County will center on staff time and possibly outside legal services.

✓	MEMORANDUM OF UNDERSTANDING REGARDING GRAND PORTAGE ZONING
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Responsible Entity: Cook County (Office of Planning and Zoning, Planning Commission, Board of Commissioners)

Applications for Plan Implementation:

While in general principal the Cook County plan and the Grand Portage Reservation land use plan do not conflict, there are specific applications where conflict may arise. Rather than waiting for an incident to force resolution, the County may prefer to establish procedures with Grand Portage on resolving these issues. The probable tool would be a memorandum of understanding.

Cost Considerations:

Initial County costs would involve staff time and possibly outside legal assistance.

✓	CONSERVATION EASEMENTS
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Responsible Entity: Private parties

Applications for Plan Implementation:

Non-regulatory, private actions can contribute towards implementing aspects of the plan. Conservation easements provide many of the benefits of public lands while keeping the land taxable and private. Conservation easements are permanent limitations on development that a landowner chooses to impose on their property. A conservation easement does not grant public access unless the owner specifies that it should. Primary motivations for doing this might include factors such as wishing to insure that one's land remain in an undeveloped state, support of wildlife and plant habitat, open space, views, water quality benefits of near-shore areas

remaining undeveloped, and a sense of personal contribution of doing one's part in insuring the continuation of an important pattern in the overall landscape. Tax benefits may also result from the placement of a conservation easement on private lands. The implementation of a conservation easement requires an organization qualified to hold the easement. One such organization is the Minnesota Land Trust. A Cook County chapter of the MLT is presently under formation.

Cost Considerations:
No public costs.



PUBLIC DECISION MAKING PROCESSES LEADERSHIP DEVELOPMENT CONFLICT RESOLUTION

Responsible Entity: Cook County

Applications for Plan Implementation:

Implementation of the plan is founded upon effective public decision making processes such as those employed in the development of the plan itself. Ongoing application of such processes may require workshops on the proper conduct of public meetings, group dynamics, and public debate. There may be a need for groups of citizens to undergo community leadership training. There may be a need for various public bodies to periodically undergo training on public processes and to adopt principles for decision making. There may also be a need to review existing County public participation procedures to determine if changes are needed.

Cost Considerations:

There would be costs for any workshops or training sessions plus the investment of citizen and staff time. The adoption of revised public participation procedures may increase the cost of public processes through additional meetings, enhanced public notification procedures, additional information dissemination, and the like.



PLAN MONITORING

Responsible Entity: Cook County (Planning Commission)

Applications for Plan Implementation:

The plan suggests that indicators be used to monitor progress toward plan implementation in Cook County. To be used the indicators require data collection, analysis and review. The following is a suggested list of indicators.

Land Use

1. Acres of land by land use
Use Assessor's annual listing of property by tax classification (to stand in for land use) to measure change in number of parcels and acres by classification.
2. Acres of land by public and private ownership
Use Assessor's annual listing to record the acres of land owned privately and publicly. If possible, this should be done by geographic

area within the county (approximating the inland/highway corridor concept of the plan).

3. Zoning permits issued
List permits issued by type and geographic location.
4. Property values
Use Assessor's records to track property values by type of land use and by geographic location.
5. Traffic counts on Highway 61
Although not strictly a land use measure, Highway 61 traffic volumes reflect level of overall land use and economic activity in Cook County.
6. Cost of services
Assign the cost of providing public services to land uses and identify any changes in these costs.

Ecology

1. Sechi disk readings
Although only a few lakes are measured, their readings provide a perspective on surface water quality.
2. On-site sewage treatment systems inspected/failures
Use Zoning office records to measure the number of systems installed, replaced and inspected.
3. Endangered/threatened species/biotic communities
Although these figures may not be updated regularly, they provide one view of ecological health. Other measures may emerge once the statewide County Biological Survey process has been completed.
4. Silvicultural Practices
Use figures from the Forest Service, MnDNR on number of acres managed using: selective cutting; clearcutting; shelterwood; prescribed burning; and size of harvest units. Include with this changes caused by forest wildfires (acres burned) and windfalls (significant events).
5. Land conversion
Figures on permanent conversion of land from one type to another by acre and type of land converted.
6. Forest composition
Data on acres managed through natural regeneration and plantations.
7. River monitoring
Tie in to actions in the County Comprehensive Water Management Plan. Use information from MPCA, DNR and perhaps a school coordinated River Watch program.
8. Wetlands disturbances
Measure the number of permit exemptions and mitigations by acres, number, type and location (by watershed).
9. Forest Breeding Bird Monitoring
Use data provided by Natural Resources Research Institute study and US Forest Service where available to monitor trends in forest bird breeding populations.
10. Road building
Measure the number of miles of new and upgraded roads and compare to previous years.

Community

1. High school graduation rates
These figures offer insight into educational competency within the county.
2. Voter participation
These figures offer insight into the degree of community concern and

involvement.

3. Crime statistics

These figures measure one basic quality of life feature.

4. Recycling participation/volume

Recycling figures can reflect community interest in sustaining a quality environment and a willingness to commit their own time to this shared community purpose.

Economy

1. Employment

Employment and unemployment figures offer a basic view of the economy; this should include analysis of type of employment, wages, and jobs by economic sector.

2. Number of businesses by sector

These figures, which may not be available annually, provide insight into the changing composition and vitality of the local economy.

3. Personal income

Income measures the relative affluence of the community.

4. Income distribution

The distribution of income provides insight into the degree of equitable participation in the local economy by county residents.

5. Self-employment

Cook County has a higher than average number of self-employed people. This figure offers insight into community vitality, entrepreneurial spirit, and economic vigor.

6. Lodging tax

This tax is a consistent measure of the level of tourism activity in the county.

Demographics

1. Total population

This is a basic measure of change within the county. It can be augmented by estimating seasonal population from seasonal property figures.

2. Birth and deaths

These figures reflect the vitality of the population and can help suggest key population trends.

3. School enrollment

This figure offers insight into change within the community and emerging or changing public service needs.

4. Age structure

This measure is an indicator of the potential future vitality of a community and a predictor of emerging public service needs. It will probably have to be estimated from other information.

Subjective Measures

These are not quantitative measures of the community. Instead, they are indicators of perceptions and feelings about the area. They should be done by all members of the Planning Commission.

1. "Tourist town" test

St. John's ten-question test provides insights into a view of Cook County as a tourism area. The test should be done for individual geographic areas within the county.

2. Listening spots

Members should visit representative spots around the county

(consistent from year to year) and record what they hear. Discuss their observations and changes from prior year.

3. Night sky viewing

Members should visit representative spots around the county (or use their own homes) and view the sky on a clear night. Discuss observations and changes from prior year.

4. Photos of selected views/corridors

Photographs or slides should be taken of selected sites from year to year. The sites should be representative of typical or key areas in the county.

Cost Considerations:

Collection, analysis and presentation of the indicator data will require staff time. This may be provided by a combination of Cook County staff, other agencies such as Minnesota Extension, and volunteers. It is possible that a teacher may undertake the task as a "real world" project for a class or group of students. The review process will absorb one meeting of the Planning Commission.

ADDITIONAL ACTIONS TO FURTHER PLAN IMPLEMENTATION

As resources and time allow, additional actions may be taken to implement the plan. These are listed below.

✓	LAND OWNERSHIP
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Responsible Entity: Cook County

Applications for Plan Implementation:

Aspects of the plan could be implemented through acquisition of land by the County. The County should undertake an analysis of lands within the county relative to plan objectives, establish priorities, and integrate acquisitions into the CIP.

Cost Considerations:

Unless there are trades or donations involved, each parcel acquired by the County will be through fee purchase. The actual amounts will vary.

✓	MEMORANDUM OF UNDERSTANDING REGARDING LAND MANAGEMENT
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Responsible Entity: Cook County

Applications for Plan Implementation:

Given the fact that 90% of Cook County is owned by federal, state and tribal governments, the plan suggests that Cook County establish formal agreements with these entities to coordinate land management in accord with this plan.

Cost Considerations:

There will be costs associated with staff time, possible legal assistance, and public process. Costs associated with the implementation of the

agreements cannot be known at this time but may exist.



DESIGN STANDARDS

Responsible Entity: Cook County and local community residents

Applications for Plan Implementation:

The plan supports the consideration of design standards to sustain a desired sense of place, especially within the built environment of Cook County. The plan calls for design standards in the review of Planned Unit Developments, Conditional Uses, new Subdivisions, or construction in designated Design Districts. The purpose of the standards is to strive for a higher level of quality and site specific design for projects that benefit from these provisions. The designation of Design Districts would arise from requests to the County from the local communities.

Some of the concepts to be integrated into the design standards might be:

1. Building Height, massing and scale

The usual limitation on building heights should be augmented with attention with standards for maximum heights for structures on slopes. A site with little or no slope can use the average grade around the building. As the slope increases, greater heights would be allowed but they would be measured on the down-slope elevation line. There could be several categories of slope each with appropriately weighted height limits.

Building massing and scale are more subjective measures related to surrounding development and site context. For example, is a store with two gas pumps the same as a station with 16 pumps and a huge canopy? In terms of permitted use they are equal, but each has clearly different scales, characters and impacts on surrounding property.

2. Materials and color

These factors need to be used carefully and should be thought of as mechanisms to deal with a proposal that might be a strong departure from the community norms rather than imposed on every project. The intent is not to interfere with the creative use of materials and colors but to gain a grip on a proposal that exceeds community character.

3. Vegetation removal

This is meant to allow consideration of views from the project and of the project from lakes, private and public lands, trails, and roadways. This is not intended to preclude close and distant views from the site or the building envelope. Standards should consider elevation, slope and type of tree cover (e.g., greatest screening is on a site with lower elevation, little slope, and conifer cover).

Community centers and urban areas require more visible connection between public roadways and buildings. This does not relieve the need for custom site design.

4. Design specific to a particular site and function

"Packaged" or standardized designs from corporate or franchise developments do not have to be accepted. Location-specific design, including consideration of re-use of existing buildings, should be

required perhaps with Incentives in the form of required parking spaces or setbacks. Commercial uses that incorporate a "drive through" function, should be viewed as a different type of use and subject to a set of specific design standards different from store-front, walk-in uses.

5. Cost to implement

The standards should consider the degree of potential increased costs for construction and maintenance, especially for residential buildings.

Cost Considerations:

There would be cost in terms of staff time and public notice for initial meetings on design districts. For any planning processes undertaken there would be costs for staff time, possible professional assistance, and public process. Amending the zoning ordinance or adopting new design ordinances would require staff time, public process, legal review, and publication expenses.



GEOGRAPHIC INFORMATION SYSTEM

Responsible Entity: Cook County (Assessor's Office, Auditor, Planning)

Applications for Plan Implementation:

The plan assumes that an increasing level of geographically oriented information will be available to guide decision making in the future.

Cost Considerations:

Providing data for the County's geographic information system will be expensive in most cases. Although some data layers may be acquired relatively inexpensively from existing sources, most will require extensive input and review work. The cost for each level of information could vary from \$5,000 to \$25,000.



COMMUNITY ASSOCIATIONS

Responsible Entity: Cook County; Minnesota Extension; Soil and Water Conservation District; private citizens

Applications for Plan Implementation:

The plan clearly calls for greater use of non-public, non-regulatory means of implementation. One of these is the use of community-based organizations operating independently and/or in coordination with the County. The County, working with Extension, could foster such actions by holding periodic workshops identifying opportunities and needs and encourage or even assist with the formation of private groups to address them.

Cost Considerations:

There would be costs for workshops and other means of disseminating information to the general public. This cost could be shared by the County and Minnesota Extension and may even be covered by a grant. Ongoing costs should fall to the private groups although County staff time may be required for follow up and coordination.



INFORMATION DISSEMINATION

Responsible Entity: Cook County; SWCD

Applications for Plan Implementation:

The plan suggests that increasing substantive public participation in land use planning processes is critical to success. One way to encourage this is to provide more information to the general public about County ordinances, procedures, documents, meetings, and similar activities. A variety of methods should be considered to maximize impact while striving to reduce costs. Techniques may include meetings, direct mailings, publication in the newspaper, use of the new community radio station, distribution via community organizations, and postings on the Internet.

Cost Considerations:

Distributing information can be expensive even for a small county. The amount of cost per year will depend upon the methods chosen and the degree of activity.



PROPERTY TAX LOBBYING

Responsible Entity: Cook County

Applications for Plan Implementation:

The plan indicates that property taxes are increasingly a controversial topic state-wide and within the county and may affect land use related decisions. They may also affect private decisions regarding development (e.g., residential units for sale or rent). The County should clearly identify its position on the property tax system and in concert with appropriate organizations such as the Association of Minnesota Counties lobby the legislature for change.

Cost Considerations:

Devising the County's position on the property tax system will require staff time and the time of the County Board. Lobbying efforts probably would occur under the auspices of the County's membership in the AMC; there may be travel expenses if members of the County Board were to address the legislature or attend functions related to this effort.



EDUCATION / ECONOMIC DIVERSITY

Responsible Entity: Local business community; Cook County; Minnesota Extension; School District; CC-GMEDA; Higher Education group.

Applications for Plan Implementation:

The plan notes that Cook County's economy has a higher than average reliance on self-employment, a figure that probably will increase in the future given changes in technology. One strategy to encourage greater diversity and dynamism in the local economy would be ongoing educational programs that foster self-employment, encourage acquisition of additional job skills, and support small business development. The impetus for such action should arise from the local business community with the County being

a cooperator along with Minnesota Extension, the school district, and the EDA. This would likely begin with a task force charged with devising a county development effort focusing on education.

Cost Considerations:

Initial costs to the County would result from staff time spent to initiate a task force and to participate on it. Follow up costs would depend on the strategies developed. Other local costs would likely fall to the school district and other participants; some of these might be offset by grants.



EDUCATION / BEST MANAGEMENT PRACTICES

Responsible Entity: County; Extension; SWCD; Lake Associations

Applications for Plan Implementation:

Appropriate and sensitive design and management of sites is not something that can always be legislated through ordinances and controls. A better approach may likely be intensive educational efforts intended to inform land owners how to be better stewards of the land. These programs could address site design, vegetation management, visual concerns, timber management, private road design and construction, surface water control, and similar concerns.

Cost Considerations:

County costs could be related to staff time and involvement with training and educational sessions.



EDUCATION / LOCAL CULTURE

Responsible Entity: Citizens; School District; Extension; Historical Society; SWCD

Applications for Plan Implementation:

The plan suggests that maintaining a sense of place and a sense of community are desired goals. Education may be a tool for integrating new residents into the weave of the heritage, culture and tradition of rural life. It is important to recognize that what may be a good solution to situations in urban or suburban centers may not work well or at all in small towns or rural settings. Similarly, it is important to recognize that newcomers may bring experiences and talents that can enhance the community. What is critical is that the solutions reflect and sustain the rural situation of Cook County. One means of achieving this would be to develop materials, pamphlets, video tapes and the like that could help introduce newcomers to the rich heritage of Cook County and create opportunities for initiatives that benefit the overall quality of life in the community.

Cost Considerations:

County costs would only relate to any staff time that might be offered to assist with this effort. Grants would be sought to conduct the research and support the production. Much of the materials, including oral histories, would come from residents themselves.