

# M I N U T E S Metropolitan Redevelopment Agency Board of Commissioners – February 12, 2019

Commissioners Present John McNeill, D.D.S. - Chair

Jill Tanis – Vice-Chair Doug Dykeman Elizabeth McNally

Greg Mills

Commissioners Absent None

Staff Present Julie Baird

Michael Bulloch Mary Holton Shaña Reeves Sherry Roach Karen Walker Warren Unsicker

Others Present Liza Miller-Via phone

#### 1. Call to Order

The meeting was called to order at 4:30 p.m. by Chair John McNeill, and there being a quorum, the following proceedings were duly had and taken.

#### 2. Approval of the January 15, 2019 Minutes

Chair McNeill asked that the approval of the January 15, 2019 Minutes be postponed until the February 19, 2019 meeting.

## 3. <u>Consideration of a recommendation to City Council regarding approval of the MRA Plan Update</u>

Chair John McNeill asked the MRA Commissioners to discuss format and grammar issues first and then to discuss issues with substance in the MRA Plan draft. Dr. McNeill asked that any grammar, spelling, or labeling issues be sent directly to Liza Miller for revision.

Commissioner Tanis began the session with a discussion on grammar and format issues. Ms. Tanis pointed out various content edits throughout the MRA Plan draft.

Chair McNeill asked Ms. Miller about the use and consistency of the word 'district'. There was discussion on how that word would be used in connection with the Animas Area/District.

Commissioner Dykeman did not have any comment.

Commissioner Mills said his issues with punctuation and spelling had been addressed. However, he asked to discuss various areas where the MRA Plan draft discussed different neighborhoods and subareas. See attached comments submitted by Commissioner Mills for the full list of suggested revisions. Ms. Miller said she would make the areas clearer.

Commissioner McNally said she agreed with Commissioner Tanis comments on the Animas area with the industrial inventory being updated and complete. Ms. McNally made some suggestions. See attached comments submitted by Commissioner McNally for the full list of suggested revisions. Ms. McNally said she was confused on the designation of 'vacant' and/or 'industrial' property with outdoor storage. Ms. Miller said she would clarify this issue. Ms. McNally said terms for 'land use', 'land zoning', and 'ownership' are confusing. Ms. McNally offered suggestions.

Chair McNeill asked the Commissioners to move to issues of substance concerning facts and statistics.

Commissioner McNally made suggestions concerning connectivity projects. She suggested clarification on the Totah Park and remediation of specific areas as well as the funding for remediation. Mitigation of the property needs to take into consideration along with the purchase of the property. Ms. Miller suggested including this information in the section for "Future Farmington". Chair McNeill agreed.

Chair McNeill pointed out issues with sections B36-B40 and section B43. Section B43 states that Main and Broadway are not state owned roads. Ms. Holton stated that Main and Broadway through the City are owned and maintained by the City of Farmington.

Chair McNeill said he was confused on the Market Analysis and how it relates to the Future Plans and the Future Farmington sections in the MRA Plan draft. Dr. McNeill said he was concerned with sections C5 through C8 where rental properties are discussed in the Medical Center area. Dr. McNeill said the draft is very negative and he would like to see some positivity from the statistics. Ms. Miller said she would gladly take suggestions and recommendation to make changes.

Chair McNeill offered suggestions and recommendations to the Implementation Plan for the MRA Plan. Ms. Miller said she would make the suggested changes.

Commissioner McNally noted the vacancy analysis was confusing. Ms. McNally suggested a visual graph or pie chart to make the analysis clearer. She asked to see the same data applied to the Animas area.

Mary Holton recommended that staff review the table provided in terms of the Industrial uses. Ms. Holton noted that San Juan Spring was not listed on the table. She said Warren Unsicker and herself can provide additional information.

Julie Baird said the Commissioners needed to proceed forward with their recommendation for the MRA Plan. The information and edits suggested at this meeting will need to be worked into the document so it can proceed to City Council for approval. Chair McNeill was hesitant to recommend approval without viewing the final document.

Liza Miller said she will have the next draft with the recommendations and edits completed by the following Monday (February 18, 2019), but she could not guarantee that her editor will have time to review the document. Ms. Holton noted that the MRA Plan will need to be adopted this month to remain eligible for a grant to fund the project.

Chair McNeill made a motion to move the MRA Plan forward with the discussed revisions to the February 26, 2019 City Council meeting. The motion was seconded by Commissioner Dykeman.

Ms. Holton said a recommendation of approval or disapproval is necessary for the document to move forward to City Council. She suggested that a motion could be tabled until the next MRA meeting on February 19, 2019. Chair McNeill said an emergency meeting for the MRA can be held if the document is not ready before the February 19<sup>th</sup> meeting.

Chair McNeill made a motion to table the decision of recommendation to City Council until the next MRA meeting on February 19, 2019. The motion was seconded by Commissioner Dykeman. The vote was 5-0.

#### 4. Business from:

- a. Floor There was no business from the Floor.
- b. Chair There was no business from the Chair.
- c. **Members** –There was no business from the Members.
- d. **Staff** Mary Holton announced that she is no longer Director of Community Development. She has taken a position as Officer of the MPO, Metropolitan Planning Organization, and managing the CDBG, Community Development Block Grant.

Julie Baird said Ms. Holton will be retiring in a year. Warren Unsicker will now be the liaison for the MRA until a new Planning Manager is hired.

#### 9. Adjournment:

A motion was made by Commissioner Dykeman and seconded by Commissioner Mills to adjourn. The Metropolitan Redevelopment Agency Board of Commissioners meeting was adjourned at 5:30 p.m.

John McNeill Chair

Caren Walker Administrative Assistant

|  |  | , |
|--|--|---|
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  | • |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |

### MRA Plan Email Comments from Commissioners

2/12/19 Revised Version

-Av

From: Elizabeth McNally

Sent: Monday, February 11, 2019 4:00 PM

Subject: RE: Farmington MRA Plan Update, Feb. 12 Draft - Initial Comments

#### Hi Everyone,

I wanted to send out some initial comments about the plan – the updates from the last version look good. I am not done reviewing the entire document, but I feel there are some changes that need to be made to Section B (see below):

#### General comments so far:

- 1. Please do a search and replace so that Healthcare Hub is either consistently capitalized throughout the document (or not capitalized, just make it consistent).
- 2. Please do a search and replace so that all dates are presented consistently throughout. I think it is probably a good idea to include the year where possible, since this document will be referred to over a number of years.
- 3. For tables and graphs throughout the document, please make sure the title includes a *reference and year* for wherever the information is pulled from.

#### Section B comments:

- 4. Page B9, the numbered items (#1-#6) add/omit punctuation at the end of item so that it is consistent.
- 5. These sections: Existing Land Use, Vacant Land Analysis, Land Status and Zoning are really hard to follow. I think these sections in particular are very important to the MRA and in guiding the City with next steps and providing rationale for proposed zoning changes, so it is important that these are rock solid and accurate.
  - a. I think they should be re-organized and presented in the order of <u>Existing Land Use</u>, <u>Land Status</u>, <u>Zoning</u>, <u>and then finally Vacant Land Analysis</u>. Part of what makes these subsections currently difficult to follow is that terms and information are prematurely presented (and not introduced) in the Vacant Land Analysis.
  - b. Existing Land Use: 616.4 acres is presented as the acreage in the MRA; however, many of the following calculations are based on the acres ZONED, which appears to be about 464 acres. In this section, please include a brief explanation of how you get to 464 acres. For Exhibit B-5, Distribution of Land Use in MRA, include the total # of acres in the MRA in the title. As a side note, this graphic is not very useful because it presents vacant as separate and distinct use. Have you really separated vacant out from the other categories of land use? Just checking.
  - c. <u>Land Status</u>: I would probably update this section to make sure that the recent City purchase of the Graves/Miller Bulk Plant property is included here. Exhibit B-11 shows land ownership by category. Either include a note here or in the text that says the total MRA acreage (616.40) less the ROW is the amount of zoned acreage (150.8 acres). I think this is the calculation? I am not completely sure.
  - d. Zoning: Again, in the section, briefly explain how the zoned acreage is derived.
  - e. <u>Vacant Land Analysis</u>: this section is really important because it will provide the basis of the need for future zoning changes. Explain how the vacant determination was made, and when. Visual reconnaissance? Map review? Interviews? What is the definition of vacant land? Not in active use? Abandoned? Property taxes not paid?
    - i. With the current layout, having Exhibits B5 and B6 next to one another is confusing because the categories of land use (B5) are very close to the zoning designations (B6). If the subsections are re-ordered, this should not be a problem.
    - ii. <u>Exhibit 36</u> clarify the title to say "Vacant Land by Current Zoning Designation (2018)" to avoid confusion down the road.

| a |     |   |  |
|---|-----|---|--|
|   |     |   |  |
|   |     |   |  |
|   |     |   |  |
|   |     |   |  |
|   |     |   |  |
|   |     |   |  |
|   |     | * |  |
|   |     |   |  |
|   |     |   |  |
|   | No. |   |  |
|   | *   |   |  |
|   |     |   |  |
|   |     |   |  |

iii. Improve this table by adding a column for the "Total Acres Zoned" (should come before columns for vacant acreage and % of total acreage). The statistics don't make sense without the total acres zoned for that particular designation.

iv. Please include the total zoned acreage for General Commercial and Local Neighborhood zoning designations – this information doesn't seem to be in the plan.

v. The percentages in column "% of Total Vacant"  $\underline{do}$ 

not add up to 100%.

vi. I would like to see a pie chart that shows the information in the revised table – you can label as Exhibit B6A to avoid renumbering other exhibits. I am attaching a spreadsheet and graph as an example of how to get these categories all in one graph.

vii. Please present this same table and associated graph for zoning and vacant land that fall *specifically within the Animas District*, since that is the area where the most significant changes will need to be made. You could include within the subsection entitled "Neighborhood Industrial Zoning" – the visuals will be helpful in understanding the challenges in this district.

- f. Exhibit B-7 Existing Land Use the legend seems off. I don't see Oscar Thomas Park or Boyd Park are the parks getting presented as public or vacant? Fix this exhibit or do not include.
- g. Exhibit B-8 Vacant Properties what is the dark gray color in the legend? It is not identified. If this supposed to be vacant land, I would question the determination of vacant land (but I guess it depends on the definition).

Thanks for looking at this. I will forward other comments later tonight or tomorrow. The plan seems much clearer overall.

Beth McNally

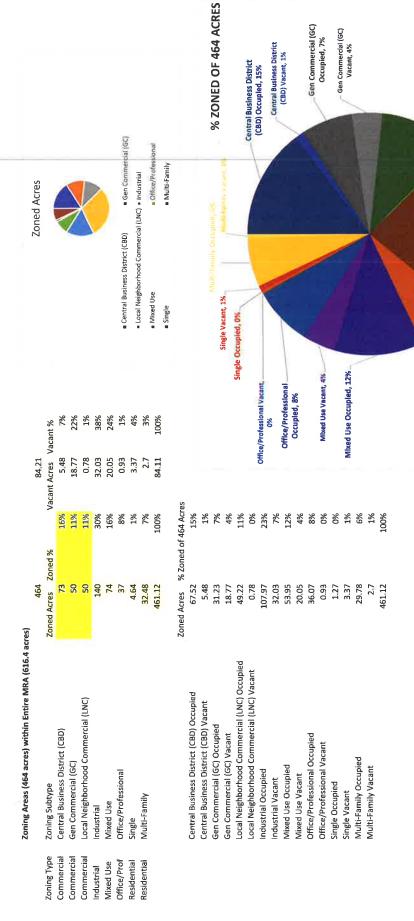
On Feb 12, 2019, at 8:53 AM, Elizabeth McNally <

Hi Everyone,

I have a few more comments to add:

- 1. Page C-28 MRA Conditions the contents of this section seem to focus only on the Downtown area. I would consider either modifying the narrative and associated exhibits to address/depict the full MRA area, or change the title of this section to "Downtown Conditions".
- 2. Page C-29 Industrial Conditions could you please clarify how the term "Industrial" is being defined? Is it purely by zoning designation, apparent current use, business license registration, etc.? Is there updated MRA rental rate and vacancy data for 2018? (Exhibit C-39). Should this subsection be renamed as "Industrial Conditions in the Animas District"?
- 3. Page C-30, Exhibit C-41 MRA Industrial Locations this map appears incomplete, but it is also inaccurate. Looking at the corresponding list of locations in Ex C-42, the list is outdated/incomplete, and the locations are not all accurately located on Ex C-41. I can see that the source of the data is E&PS, but there is no date for this reference. This information should have been updated and either field verified or confirmed with the City staff.
- 4. Page C-31 "MRA Conditions" is presented a second time as a subsection heading. Not clear if this intended, the narrative in this section talks about the Animas District.

Thanks
Beth McNally



Commercial (LNC) Occupied,

11%

Local Neighborhood

Local Neighborhood Commercial (LNC) Vacant, 0%

Industrial Occupied, 23%

Industrial Vacant, 7%

.

From: Greg Mills

Sent: Tuesday, February 12, 2019 7:43 AM

Subject: Re: Farmington MRA Plan Update, Feb. 12 Draft

Good morning,

Everyone else has addressed punctuation, spelling, etc., so I won't do that. However, I have a few things that I think need to be looked at.

- 1. The document states that there are three different neighborhoods. Where in the document, and how, does it explain the origin of the Healthcare Hub? Is it a sub area of the Animas or is it now a separate neighborhood? If it is a sub area, then the other areas should not also be called "sub areas". Or, if it's a separate neighborhood, then we need to say that there are four neighborhoods from the beginning. Personally, I like four neighborhoods.
- 2. On page C-21, it states that the purchase of the Hilcorp building on 30th street, by SJC and FMS, will reduce the vacancy rate in the MRA. How? This building is not in the MRA. I think it's supposed to say "vacancy rate in the city".
- 3. Page D-16, the header "Civic Center Neighborhood" needs to be moved to page D-17 above the Overview paragraph.

Sincerely,

Greg Mills

#### 2019 MRA Plan Update

#### **Comments submitted by Jill Tanis**

#### **Content Edits**

Throughout the document the subareas are referred to differently as indicated below:

- Historic Downtown, historic Downtown, Downtown area, downtown
- Civic Center Neighborhood, Civic Center neighborhood, Civic Center area
- Health Care Hub, Health Care hub, health care hub, Health Care Area, Health Care area
- The Animas Area, The Animas area, the Animas area, The Animas, the Animas, Animas (Animas is used interchangeably when referring to The Animas Area and also to The Animas River)

These are not all of the possible various differences but provides an overall example of the inconsistencies.

The corrections of these inconsistencies should probably not be made 'across the board'. There are situations where an 'across the board' approach may be an inappropriate action and the context of the use should be evaluated.

There are also numerous instances of the word 'city' as opposed to City when it is used or should be used as a proper noun. Again, these instances, likewise should not be made across the board but context should be considered.

- Pg vii Contents D. Future reference to 'Healthcare Hub '.......D- 9 is missing
- Pg B-5 Connections last sentence 'Connectivity to the center should be improved.' Is 'the center' Referencing the Civic Center, the Senior Center, or the center of Civic Center Neighborhood?

Assets and Opportunities section:

Community History, the page numbers are B-1 thru B-7. The page numbers should be B-7 thru B-15.

- pg B-29 Development Pattern reference to Exhibit B-16 is incorrect...not clear what exhibit should be referenced
- pg C-21 Office Conditions the Hillcorp Building is not in the MRA. The last sentence of this subsection 'If they (the buyers) acquire and occupy this building, it would reduce the vacancy rate om the MRA.' How? 'MRA' should be changed to 'Farmington' or the entire sentence should be stricken.
- Pg C-22 Exhibit C-26 Office Average Rental Rates and Vacancy Trends appears to use the Hillcorp Building vacancy in the for the MRA in the 2017 column. This directly and erroneously effects Exhibit C-28 of the data from the table represented in graph format. Also, in Exhibit C-26, why is the data for the MRA rent per sq ft for 2010 N/A instead of containing an average rate?
- Pg C-22 Industrial Conditions Exhibit C-39 Rent per sq ft for 2010 reflects \$0.00. This data also causes a misrepresentation in the graph in Exhibit C-40 on pg C-30.
- Pg C-31 MRA Conditions: Re-write the 1<sup>st</sup> sentence. Recommendation based on observation of the Animas Area. Per some of the maps such as B-39, The Animas Area intended west

boundary is South Lorena Street. Additionally, industrial uses are predominant in the entire Animas Area, not necessarily only east of South Behrend...some large industrial users are actually within the newly designated Healthcare Hub. Recommended adjustment to the 1<sup>st</sup> sentence: 'Industrial uses in the MRA are concentrated in The Animas Area which is south of Animas Street.'

Some information in Exhibit C-42 MRA Industrial Inventory is incomplete, incorrect, or duplicated (ie: item #4 and #6 are the same property and the name is incorrect). While not every property needs to be identified, a better mix of industrial use properties across the entire The Animas Area may be a better representation of MRA Industrial Inventory. An adjusted list is provided below but only contains the item #, description address, and example tenants (year and size info was not readily available). Nearly all of these properties include a warehouse and extensive use of outdoor storage.

| Item# | Description               | <u>Address</u>   | <b>Example Tenants</b> |
|-------|---------------------------|------------------|------------------------|
| 1.    | Alpine Lumber             | 400 S Miller     | Lumber Company         |
| 2.    | Daily Times Press         | 305 N Allen      | Newspaper Publisher    |
| 3.    | Dirt Bandit Sweeping      | 101 E Pinon      | Paving Contractor      |
| 4.    | XPO Logistics             | 420 W Elm        | Trucking Company       |
| 5.    | Southwest Building Blocks | 755-765 S Miller | Fence Contractor       |
| 6.    | National Roofing Co       | 110 E Pinon      | Roofing Contractor     |
| 7.    | NM Gas Co                 | 603 W Elm        | Utility Company        |
| 8.    | Cy Cooper                 | 615 W Elm        | Fire Suppression       |
| 9.    | Marquez Industrial        | 311 W Cedar      | Equipment Rental       |
| 10.   | Mechanical Solutions Inc  | 105 E Elm        | Contractor             |
| 11.   | L&L Oilfield              | 120 W Maple      | Contractor             |
| 12.   | Farmington Flooring       | 518 W Maple      | Contractor             |
| 13.   | Foster Plumbing           | 601 S Behrend    | Contractor             |
| 14.   | Frac Master               | 503 S Behrend    | Machine Shop           |
|       |                           |                  |                        |

A copy of a revised map for Exhibit C-41 is included representing the MRA Industrial Locations.

- Pg D-8 Strategies #2.  $2^{nd}$  paragraph 'next year' should be replaced with the actual year (ie: 2019 or 2020) that the implementation of the trail plan is scheduled.
- Pg D-12 Exhibit D-2 Remove the multi-modal path dotted line represented next to the Indian Center extending from Elm St to Maple St.
- Pg D-19 Healthcare Hub: 'South Auburn' should read 'South Lorena'.

#### **Typos & Formatting**

| Pg A-8  | 2 <sup>nd</sup> paragraph - Exhibit I-1 should read Exhibit A-4. |
|---------|--|
| Pg B-10 | Railroad Commercial – 'Kirkland' should read 'Kirtland'          |
| pg B-31 | Promoting Urban Fabric – Exhibit B-13 should read B-14           |
| pg B-33 | Parking Regulations – paragraph 3 – change Exhibit B-14 to B-15  |

| pg B-35 | First paragraph reads'civil penalty of fines' change to 'civil penalty or fines'   |
|---------|--|
| pg B-36 | Livability Design Guidelines – 2 <sup>nd</sup> paragraph – delete the word 'the' between 'these basic'   |
| pg B-42 | Mass Transit – 'Tnm&O' should read 'TNM&O'   |
| pg B-43 | Roadways – 'Behrand' should read 'Behrend'   |
| pg B-50 | Complete Streets on Main – 'five blocks' should read 'six blocks'  |
| pg C-17 | Retail Trade – 'Mineral Counties' should read 'Archuleta County'   |
| Pg C-23 | MRA Activity – Exhibit 4-32 should read C-32 and Exhibit 4-31 should read C-31. Also, the word 'the' should be removed between 'is 300'.   |
| Pg D-5  | 2 <sup>nd</sup> bullet point – 'program' should read 'programs'.   |
| Pg D-6  | 11 <sup>th</sup> bullet pint – 'THE' should read 'the'   |
| Pg D-8  | Strategies – #1 2 <sup>nd</sup> paragraph – 'Industrial' should read 'Industrial (IND)'  |
| Pg D-12 | Potential Connections (block) – 'Hub Boyd' should read Hub, Boyd'  |
| Pg D-14 | Historic Downtown – Overview – 'and to east' should read 'and east'  |
| Pg D-14 | Strategies - #1. 'five block' should read 'six block'.   |
| Pg D-16 | The subheading 'Civic Center Neighborhood' needs to be moved to the top of pg D-17.  |
| Pg D-17 | Roadmap – All entries for this subheading are in bold format except for the fourth one on the following page. Is that intentional or should entries be bullet points with normal font? |
| Pg F-2  | Appendix: Duplicate 10-4-2018 Sign-In Sheet  |

|  |  | • |
|--|--|---|
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |
|  |  |   |

From: John

Date: Thu, Feb 7, 2019 at 2:57 PM

Subject: Re: Farmington MRA Plan Update, Feb. 12 Draft

Thank-you. I have a suggestion regarding Exhibit B-18 on page B-39: Is it possible to change the area designations from a strictly defined border between the Healthcare hub to the Animas residential neighborhood to the Animas ORII to more blended transition zones somehow.

Please also include the concepts of the MRA and this plan affecting the areas adjacent to the MRA and how the bordering neighborhoods relate to, affect and benefit from the MRA. We need to reach out to our neighbors in all the planning processes you propose.

Finally, I noticed a couple typos:

Pg. B-6; Exhibit B-1: the label on the map: Farmington Intertribal Indian Museum is not a "Museum", it commonly referred to as a "Center".

Pg. D-19: "SMJRC" should me SJRMC

I look forward to our meeting and conference on Tuesday John McNeill

|   |          |  | 40 |
|---|----------|--|----|
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
| v |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
| - |          |  |    |
|   |          |  |    |
|   |          |  |    |
| 6 |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   | 2.<br>2. |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |
|   |          |  |    |

From: Daniel Guimond

Subject: RE: Farmington MRA Plan Update, Feb. 12 Draft - additional comments

Date: February 12, 2019 at 10:57:21 AM MST

Liza – Attached are a couple of edits to the report to address the question about the gap analysis. The text in red should be inserted and/or substituted in the Retail Conditions section.

The few tables that did not have a date are also shown the other attachment. Additional responses to Ms. McNally's comments are shown below in red as well

- 1. Page C-28 MRA Conditions the contents of this section seem to focus only on the Downtown area. I would consider either modifying the narrative and associated exhibits to address/depict the full MRA area, or change the title of this section to "Downtown Conditions". I think it should stay MRA Conditions. However, it should be a sub-heading or #2 heading under Retail Conditions. We make it clear in the text that the retail inventory is almost entirely in the Downtown District in the text. This same comment on the subheading would apply to Industrial and Multifamily Conditions as well.
- 2. Page C-29 Industrial Conditions could you please clarify how the term "Industrial" is being defined? Is it purely by zoning designation, apparent current use, business license registration, etc? Is there updated MRA rental rate and vacancy data for 2018? (Exhibit C-39). Should this subsection be renamed as "Industrial Conditions in the Animas District"? Same comment the Industrial development is largely in the Animas District but the text makes that point.
- 3. Page C-30, Exhibit C-41 MRA Industrial Locations this map appears incomplete, but it is also inaccurate. Looking at the corresponding list of locations in Ex C-42, the list is outdated/incomplete, and the locations are not all accurately located on Ex C-41. I can see that the source of the data is E&PS, but there is no date for this reference. This information should have been updated and either field verified or confirmed with the City staff. We were working with CoStar data and using end of year data for 2017. It may not be a complete inventory. If staff wants to make any edits we can incorporate them. However, they should have done this on the initial drafts.
- 4. Page C-31 "MRA Conditions" is presented a second time as a subsection heading. Not clear if this intended, the narrative in this section talks about the Animas District. Same comment as above. It is a subheading in the section on Industrial Conditions

From: Liza Miller

Sent: Tuesday, February 12, 2019 10:03 AM

Subject: Re: Farmington MRA Plan Update, Feb. 12 Draft - additional comments

#### Dan.

Ms. McNally tif the Farmington MRA Commission has shared some comments on the Market Study chapter. I will say that she has repeatedly expressed concern that there are no dates associated with tables in the chapter- despite the fact that I added a call out to the chapter noting that all data were collected during the planning process in 2018 and represent that snapshot in time. So, at this point we either ignore her or add citations with dates to each table, which is surely the more responsible route. Is it accurate to add 2018 to All sources in the market study?

Liza Miller Planner Architectural Research Consultants, Inc.

|  |  | 11 |  |
|--|--|----|--|
|  |  |    |  |
|  |  |    |  |
|  |  |    |  |
|  |  |    |  |
|  |  |    |  |
|  |  |    |  |