

MOHAVE DR

RM-2

OS

RS-5A

CF

RM-1

RS-18

ORCHARD LN

ELBERTA DR

RM-2

401-05-004A

401-58-001A

RS-10

NAVAHOPI RD

JORDAN RD

CANYON TAIL TR

WILSON CANYON RD

SMITH RD

RM-3

RS-10

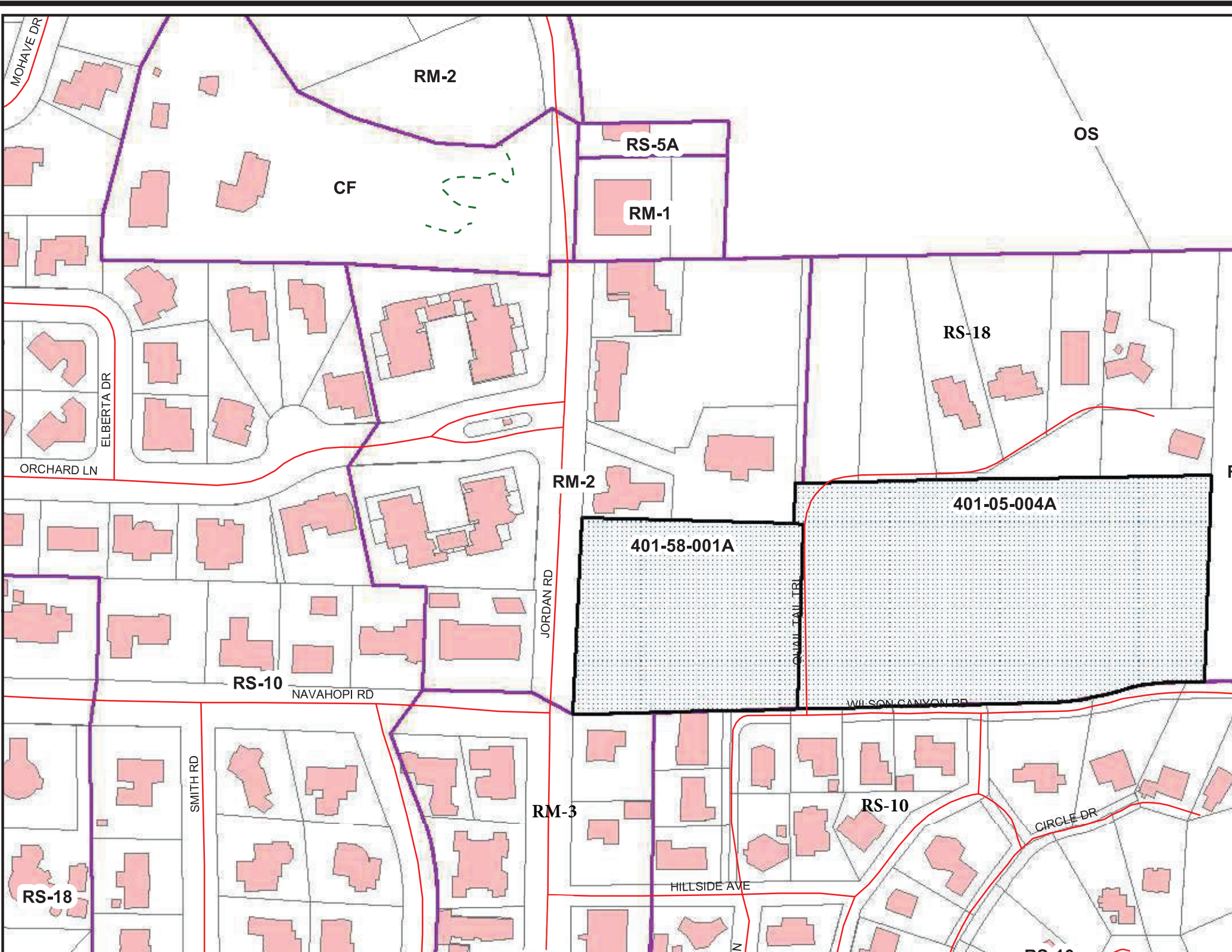
CIRCLE DR

RS-18

HILLSIDE AVE




N

52-10



Aerial View

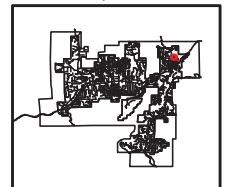
Parcel
401-58-001A &
401-05-004A
Jordan Lofts

-  Parcel 401-58-001A & 401-05-004A
-  Parcel Boundary
-  Street Centerline



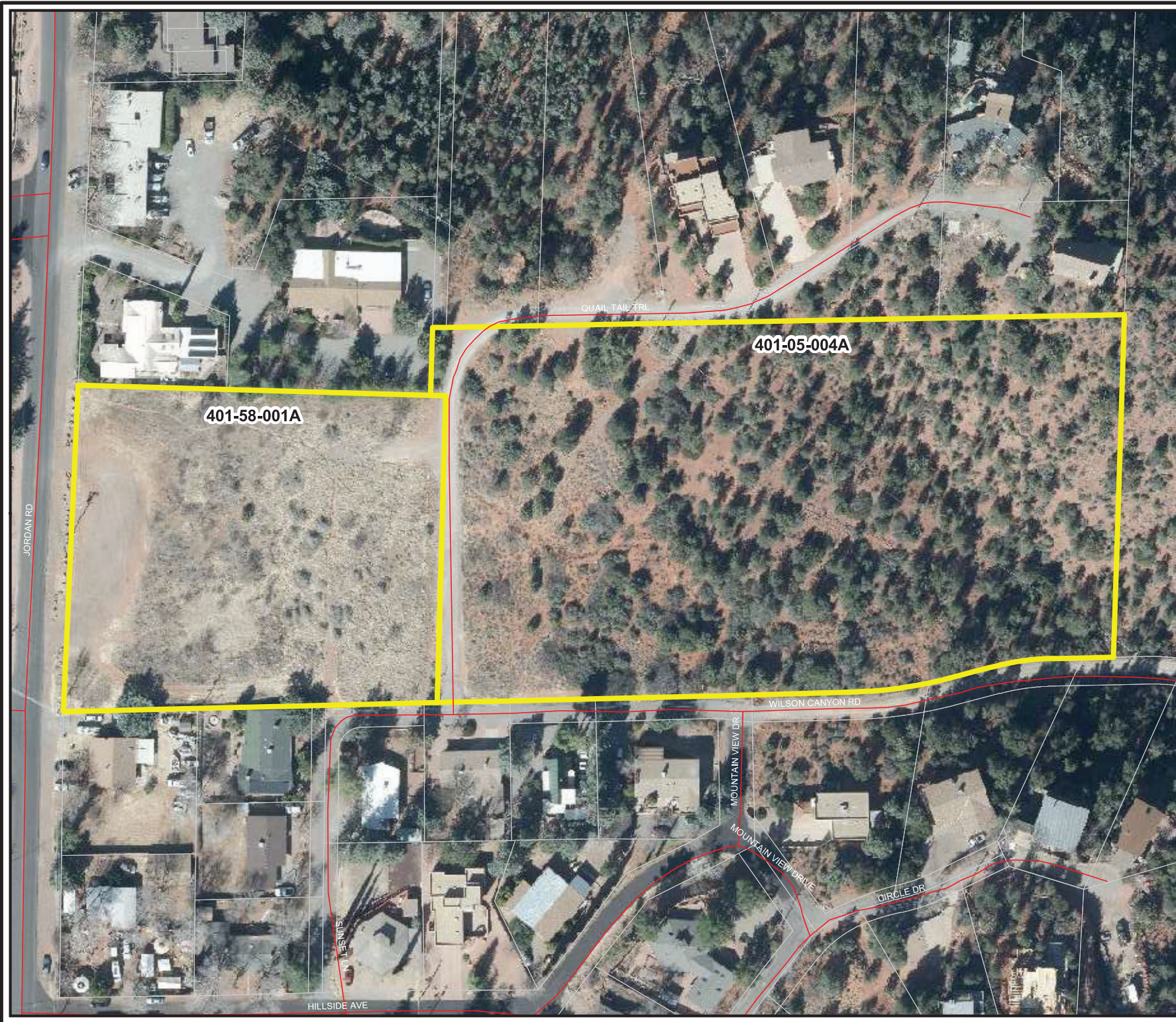
0 37½ 75 Feet

City Index



GIS, City of Sedona
05/11/2021
g:\projects\projects\jordanlofts/
mxds\401-58-001a_401-05-004a_aerial.mxd

This map is designed to provide information about Sedona, and has been prepared for general planning and informational purposes only. It is not necessarily accurate to engineering or surveying standards. Every effort has been made to make this map as complete and as accurate as possible; however, no warranty or fitness is made.
The information is provided on an "as-is" basis. The City of Sedona and its staff are not liable for any loss or damages in connection with or arising from the information contained on this map.





On June 1, 2021, the Planning and Zoning Commission held a Work Session to discuss the proposed Major Community Plan Amendments the City is considering for 2021. The purpose of the work session was for the Planning and Zoning Commission to review the proposals and request additional information they felt would be needed to allow them to act on each proposal.

During the discussion for Jordan Lofts (PZ21-00002), the Commission requested clarification on a number of items. The following is provided in response to that request.

1. Pinion Lofts Questions

Based on discussions with Pinion Lofts representatives, staff notes the following:

- There are 45 units
- Occupancy is 100%
- Sedona local workforce makes up 57%
- One bedroom, 642 sq ft units start at \$1490/mo.
- One bedroom, 742 sq ft units start at \$1,615/mo.
- Two bedroom, 1,020 sq ft units start at \$1,735/mo.
- Two bedroom, 1,042 sq ft. units start at \$1,765/mo.

There appears to be a broad age range represented based on observations from one resident.

2. Quail Tail Trail

Quail Tail Trail has a 20 foot easement. Public Works has noted that there will be no requirement to widen the easement.

3. Sewer Capacity

Public Works has indicated that there is adequate committed capacity for the project.

4. Effect of additional units in Uptown

There are a total of 626 residential units in Uptown. The Jordan Lofts project would increase this by 84 units or 13%. This would also increase the number of apartment units from 102 units to 186 units (or 82%). The existing zoning would allow for 33 units. The proposed 84 units would add another 51 units above current zoning. However, as addressed in the Staff Report, the effects of single-family houses is different than the effects of multifamily units, so comparing total units is not always the best benchmark. Refer to Staff Report for additional information.

The applicant has submitted a trip generation letter showing the development for the eastern 4.4 acres would generate 322 daily trips, 24 in the a.m. peak and 31 in the p.m. peak.

5. Sustainability recommendations for multi-family

The upcoming Climate Action Plan will have more specific recommendations for a multi-family project and would likely cover items such as:

- Renewable energy/solar
- Electric Vehicle Charging (from capable to installed).
- Construction waste
- Sidewalks, pedestrian improvements.

6. Short-Term Rentals

Total listings in the City = 771

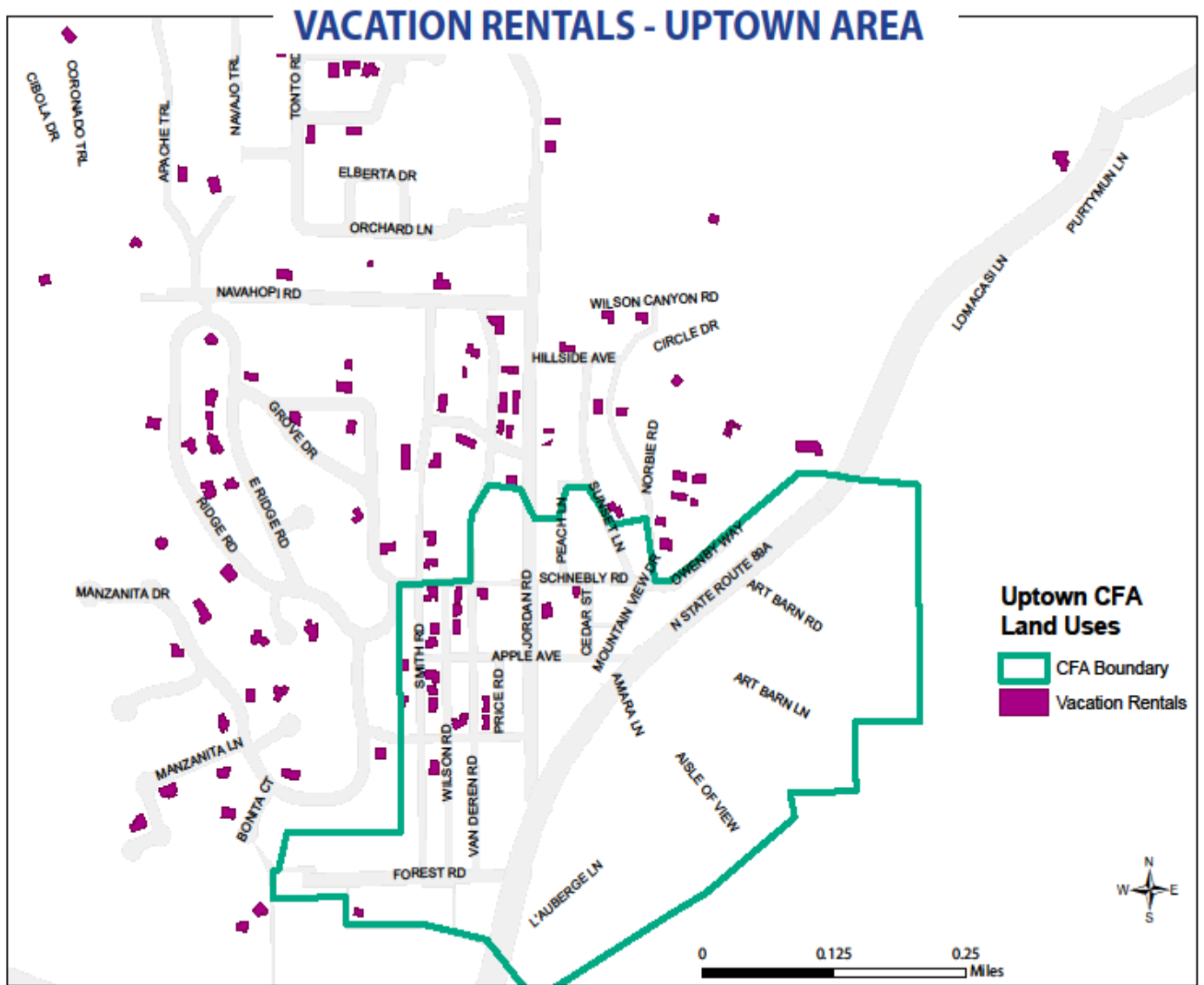
Total dwelling units in the City = 6705

Percentage of residential units listed as short-term rentals = 11%

Total listings in Uptown = 111

Total dwelling units in Uptown = 626

Percentage of residential units listed as short-term rentals in Uptown = 18%.



7. Allowable density vs. built density in Uptown.

The staff report addresses city wide trends for larger projects. Staff is looking into the Uptown numbers.

8. Largest Apartment Complexes

This is addressed in the Staff Report.

9. Past Community Plan Amendment Examples of Single-family Low Density to Multi-family Medium and High Density.Community Plan Amendment History: 1991-1997

The Community Plan was amended four times between 1994 and 1996 to increase residential density. These changes involved Single-family Medium and Low Density to Multi-family Medium and Transitional (Densities from 4-8 and 4-12 units per acre).

During 1993 and 1994, there were two amendments reducing the housing density. One involved a significant portion of the City (18 subdivisions) being reduced in density to match existing zoning (Single-family medium to single-family low density). The other amendment removed 2.3 acres of Multifamily in Uptown, redesignating it to Commercial and Open Space.

First Community Plan Update: 1998

The 1998 Community Plan established Transitional Areas, some of which could have allowed densities above 12 units per acre. However, no specific changes to the Plan's Future Land Use Map were made for densities above 12 units per acre. There were two changes to the map that increased residential densities during the Plan update: One involved changing Single-family Medium density to Transitional, Lodging, Multi-family and Single-family. The other change was from Single-family Medium to Multi-family Medium Density.

Alternatively, 20 acres were reduced in density from Multi-family Medium and High Density to Single-family Low Density (Foothills South – also noted in the staff report).

Second Community Plan Update: 2002

The 2002 Community Plan took a more conservative approach to growth, reflecting concerns about density and transitional areas. Transitional areas and zones were removed and densities were limited to a maximum of 12 units per acre. Transitional Areas and Commercial Focused Activity Centers are today's CFA locations.

The Uptown parking lot reduced the multifamily residential area by two acres (from Multi-family Medium and High Density to Public Semi-public).

Amendments in 2006 and 2007 involving the former USFS property and Cultural Park included mixed use projects for which the land was never rezoned and the projects never built.

Third Community Plan Update: 2013

This update included the CFA Planning Process:

- 2016 Soldier Pass CFA: Includes Planned AREA AND Single-family Medium Density that could be redeveloped as multi-family

- 2016 Western Gateway CFA: The CFA encourages high density multi-family development to address housing needs as part of a mixed use scenario on the Cultural Park Site and around the Medical Center.
- 2017 Sunset Live/Wk CFA – Encourages multi-family development within the mostly commercial area.
- 2017 Schnebly CFA: Proves an opportunity within the area to increase residential density for RS10 and RS-18 zoned areas.

The Pinion Lofts project (2017) re-designated commercial to multifamily High Density. Thus far, this is the only project to be re-designated under this new Community Plan High Density designation.



City Of Sedona Community Development Department

102 Roadrunner Drive Sedona, AZ 86336

(928) 282-1154 • www.sedonaaz.gov/cd

To: Whitney Cunningham, Project Contact

From: Mike Raber, Senior Planner, (928) 204-7126, mraber@sedonaaz.gov
Cari Meyer, Planning Manager, (928) 203-5049, cmeyer@sedonaaz.gov

RE: PZ21-00002 (Major CPA, Conceptual ZC, Conceptual DEV) Jordan Lofts
Community Development Department Comments

Date: May 6, 2021

Staff has completed a preliminary review of the submitted materials for the above request and has the following comments. Please note that this preliminary review does not constitute a recommendation to approve or deny the request and does not seek to verify the accuracy of statements made by the applicant.

The following is provided as comments on the initial submittal package for the proposed Major Community Plan Amendment, Conceptual Zone Change, and Conceptual Development Review, focusing on the additional information Staff will need in order to complete the review of the application. As the project moves through the process and we come to a better understanding of the proposal, additional questions and comments may be generated.

Staff is also requesting a site visit with members of the Planning and Zoning Commission during the morning of June 1, 2021.

1. Project Schedule – Major Community Plan Amendment

As this project involves a Major Community Plan Amendment, the following schedule has been set and must be adhered to in order to process the application in accordance with state requirements. If the project misses a meeting, deadline, or does not provide the required information to City Staff by the specified dates, the project may not be able to move forward and would have to wait until next year to be considered.

- a) May 19, 2021: Deadline for the initial Public Participation Report. This can be supplemented at a later date, but the final version must be submitted by June 22, 2021.
- b) May 19, 2021: Deadline for additional information to be provided to Staff for inclusion in Planning and Zoning Commission meeting materials for Planning and Zoning Commission Work Session. Responses to comments are not required at this time, but will be accepted and provided to the Commission if received by the deadline.
- c) May 24, 2021: Deadline to withdraw application and receive a refund of noticing fees (if project is withdrawn after this date, the applicant will be responsible for their share of noticing fees incurred by the City).
- d) June 1, 2021: Planning and Zoning Commission Site Visit (a.m.) and Work Session (4:30 p.m.)
- e) June 22, 2021: Revisions in response to comments and final public participation report due to Staff for inclusion in meeting materials for Planning and Zoning Commission Public Hearing.
- f) July 6, 2021, 4:30 p.m.: Planning and Zoning Commission Public Hearing.

- g) August 11, 2021, 3:00 pm: City Council Work Session
- h) September 15, 2021, 3:00 pm: City Council Public Hearing

2. General Comment

The request is for approval of a Major Sedona Community Plan amendment, Zone Change and Development Review in order to develop 84 townhome-style loft apartments. The subject parcel consists of two parcels totaling 6.5 acres along the east side of Jordan Road, bisected by Quail Tail Trail and north of Wilson Canyon Road (630 Jordan Road and 500 Quail Tail Trail, Sedona). The western 2.1-acre parcel is designated as Medium and High Density Multi-family (4-12 DU/AC) and the eastern 4.4-acre parcel is designated Single-family Low Density (.5 to 2 DU/AC) on the Sedona Community Plan Future Land Use Map. The Major amendment request would re-designate the subject property (both parcels) as “Multi-family High Density (more than 12 DU/AC)” on the Future Land Use Map. The requested rezoning is from RM-2 (Multi-family residential High Density) on the 2.1 acre parcel and RS-18 (Single-family Residential) on the 4.4 acre parcels to RM-3 (Multi-family High Density) for the entire 6.5 acres. The Community Plan provides that high density multi-family projects may exceed densities of more than 12 DU/AC on a case-by-case basis through consideration of strategies for achieving housing diversity, affordability and availability to address local housing needs.

Concerns have been expressed that since the Multi-family High Density designation allows for more than 12 DU/AC and the RM-3 zoning allows for 20 DU/AC, the project could be expanded beyond 84 units in the future. At 84 units, the proposed density is 12.9 DU/AC, just above the threshold for the High Density designation and close to the current density allowed by the RM-2 zoning on the west 2.1 acres. In order to address the public comments regarding potential future expansion, the applicant should consider assurances that can be provided to ensure that there would be no further expansion.

Although staff is not, at this point, providing a full evaluation or recommendation regarding the project, one option to consider would be the re-designation of the east 4.4 acres As Multi-family Medium and High Density (4-12 DU/AC) rather than High Density (more than 12 DU/AC) and with a rezoning to RM-2 rather than RM-3. Section 2.24.B.(3) of the Land Development Code provides that “Dwelling units that are deed-restricted to meet the City’s affordable housing criteria in the Development Incentives and Guidelines for Affordable Housing (DIGAH) shall be exempt from density calculations...” The proposed dedication of 10 units as affordable per the DIGAH could allow the entire project 84 units under RM-2 zoning. If the properties are kept separate, the eastern property would meet RM-2 density limits while the western portion would need the higher density limits of the RM-3 designation. These options could provide some assurances regarding future expansions.

3. Letter of Intent (LOI)

- a) Page 3: Please change “Sedona Lofts” to “Jordan Lofts” (and on any other re-submitted materials).
- b) Page 4: Last line. “western side” should be “eastern side”.
- c) Page 4: The Vicinity Map does not appear to show the existing land uses/zoning as described. Please include a vicinity map with the existing zoning.
- d) Item #1, page 7: The first sentence in the full paragraph includes a “C-2”. Please correct this.

- e) Item #4, page 7 and 8. Staff doesn't understand how "...proposed development helps maintain an existing lodging concentration..." has anything to do with this policy. Please consider revising this.
- f) Item #5, page 8, first full paragraph, second sentence: "...open space west..." should be "...open space east..." Please correct.

4. Citizen Participation Plan

- a) Please change "Sedona Lofts" to "Jordan Lofts".
- b) Last sentence, first paragraph: It should be clarified that the information in the Citizen Participation Plan also should comply with the Public Participation requirements of the Sedona Community Plan (For the applicant, these are essentially the same as Section 8.3.D. of the LDC and the Design Review, Engineering and Administration Manual).
- c) B. Applicability and Requirements: Please add the following bullet: Notification per the mailing list and map provided.
- d) E. Public Meetings: Follow up Meetings and G. Report of Proceedings: Please be sure to conduct a follow-up meeting to the one conducted on May 1, 2021. An initial Public Participation Report must be submitted by May 19, 2021, but a supplement to that report can be submitted as late as June 22, 2021.

5. Conceptual Zone Change and Development Review

Conceptual review of an application requires minimal information but allows for feedback to be provided to the applicant for consideration as they prepare their final application documents. No changes to the plans are required during the conceptual stage. However, the following are general comments that the applicant should take into consideration while finalizing the Zone Change and Development Review portions of the application.

a) Documents Referenced

- i) The Land Development Code (LDC) is online at the following link:
<https://sedona.municipal.codes/SLDC>
- ii) The Design Review, Engineering, and Administrative Manual (Manual) is available online at the following link:
<https://www.sedonaaz.gov/home/showpublisheddocument/38278/637176279894770000>

b) Letter of Intent (LOI)

- i) Any changes made to the Letter of Intent for the Community Plan Amendment should also be reflected in the LOI for the Zone Change/Development Review
- ii) Page 5
 - (1) The first paragraph under Vicinity and Context ends with "The subject site is an infill location with existing structures." Clarify this statement, as there are no existing structures on the property.
 - (2) Discussion of Approval Criteria: This section skips "A. Generally" from LDC Section 8.3.E(5), causing the lettering used in the LOI to not match with the lettering in the LDC. Include all sections so lettering in the LOI matches the LDC.

iii) Page 18

- (1) Under Affordable Housing Discussion, the LOI states there will be 5 one bedroom units, 78 two bedroom units, and 5 three bedroom units. This would be a total of 88 units, not the total of 84 units stated in other sections of the LOI.

iv) Page 19

- (1) Under additional assurances the applicant is proposing to protect the project for its intended market, consider whether giving priority for a percentage of the units to employees currently working within City limits or with a written offer of employment within the City is feasible. This was one of the items done for the Pinon Lofts project (approved in 2017).

c) Project Plans

- i) Provide building numbers/designations for ease and clarity of future comments.

ii) Heights

- (1) Please ensure that the architect has a good understanding of the City's height requirements and provides sufficient information for review (LDC Section 2.24.E). The topographic changes within the footprints of the easternmost buildings could create challenges when it comes to height compliance.
- (2) Based on the elevations, it appears that the units will need to apply Alternate Standards. Please review the Alternate Standards section of the code (LDC Section 2.24.E(4)) and clearly indicate how alternate standards will be applied to the buildings if needed.
- (3) Due to the complexities of the City's height requirements, please contact staff to set up a meeting to discuss heights early on in the final design stage to ensure everyone is on the same page with how heights will be evaluated.

- iii) All floor plans are for 2 bedroom units; the LOI states there will be 1 bedroom, 2 bedroom, and 3 bedroom units. Provide floor plans for all units and indicate where on the site plan the different unit types will be located.

- iv) Provide a total square footage calculation for each unit type.

v) Sidewalks/Pedestrian Circulation

- (1) A sidewalk will be required along the Jordan Road frontage of this project. To strengthen the statements in the LOI regarding circulation and the ability of residents of this development to walk to Uptown, sidewalks should continue off site and connect to existing sidewalks.
- (2) Clearly show how pedestrian connections will be provided from on-site locations to the public sidewalk along Jordan Road.
- (3) See Public Works comments for additional sidewalk requirements and how the new sidewalk will connect to existing sidewalks in the area.

vi) Parking

- (1) 1-bedroom units are required to provide 1.25 parking spaces and units with 2 or more bedrooms are required to provide 1.75 parking spaces. Adjust parking calculations to reflect the final unit counts.

- (2) 0.5 covered spaces are required for each unit; an 84-unit complex would be required to have 42 covered spaces. Indicate location of covered spaces.

vii) Landscape Plan

- (1) The landscape plan references a previous version of the Land Development Code. Please review the City's current landscaping requirements in LDC Section 5.6 and ensure the plans meet current requirements.
- (2) Use the current native plant list when developing the landscape plan, Manual Appendix A.

viii) Colors

- (1) The majority of colors submitted on the color board exceed the maximum permitted LRV. Given the proposed height and the potential for application of Alternate Standards, a lower LRV may be required.
- (2) Physical samples of all colors and materials will be required with the comprehensive submittal.

ix) ALTA Survey

- (1) The ALTA Survey submitted was done in 2008. Manual Section 1.1.H(9) requires that the ALTA be completed within the last 2 years.
- (2) The survey shows a 20' wide ingress/egress/PUE along Quail Tail Trail while the Tree/Topography survey shows a 30' wide easement through this area. Clarify width of easement.

x) Quail Tail Trail

- (1) Previous development plans for these properties widened the Quail Tail Trail ingress/egress/PUE from 20 feet to 50 feet. Indicate if widening the easement is being considered as a part of this project.

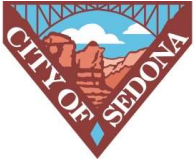
xi) When resubmitting, please roll plans (do not fold).

d) Previous Approvals

- i) The City approved Final Plats for these parcels (Jordan Condominiums and Jordan Estates) in 2012. While financial assurances were never provided and the plats were never recorded, these are still valid approvals. In order to move forward with this application, these approvals must be abandoned. Please contact Staff to determine the appropriate process.

6. Potential Fees: The project will be charged development impact fees and sewer capacity fees at the time of building permit issuance. These fees are subject to change and may be waived for deed restricted affordable housing units. The current rates are as follows:

- a) Sewer capacity: \$8,621.59 per housing unit.
- b) Development Impact Fees: \$4,491 per housing unit with square footage between 701 and 1,200 square feet (includes fees for Parks, Police, and Streets). Larger units are charged higher fees. Once square footage of the units are provided, more specific fees may be provided.
- c) Other fees may be applicable and the development will be subject to all fees in place at the time of building permit submittal.



City of Sedona

Public Works Department

102 Roadrunner Drive Sedona, AZ 86336

(928) 204-7111 • Fax: (928) 282-5348;

Ryan Mortillaro, EIT (928) 203-5091

PZ21-00002 (MCPA)
Jordan Lofts (Conceptual Review)
4/1/2021

Engineering Comments

Please address all comments by the next submittal:

1. No comments.

Potential future Engineering comments for Development Review:

- As the proposed development is 10 or more residential dwelling units, please provide a traffic impact analysis.
- Please provide preliminary grading and drainage plans.
- Please provide a preliminary drainage report.
- Please provide a geotechnical report.
- Please provide a sewer analysis report.
- Please provide a 10' sidewalk along the Jordan Rd frontage.
- For projects involving grading of more than 5,000 cubic yards, an assurance bond is required per DREAM 3.1.G.1.
- This proposal will to exceed the Wastewater Reclamation Plant's allowed committed capacity. P&Z and City Council must approve an increase in current plant capacity in order to approve this project. Please request this expansion as part of the proposal and development agreement.



Public Works Department

102 Roadrunner Drive Sedona, AZ 86336
(928) 204-7111 • Fax: (928) 282-5348;
Hanako Ueda, EIT (928) 203-5024

**PZ21-00002 (ZC, CUP)
Jordan Lofts (Conceptual)
05/06/21**

Engineering Comments

Please address all comments by the next submittal:

1. Please provide a Traffic Impact Study.
2. Please provide a geotechnical report.
3. Please provide a sewer design report.
4. Please provide a 10' shared use path along the Jordan frontage and a raised crosswalk at Navahopi Rd to connect pedestrians to the sidewalk across the street.
5. To promote social interaction, as described in the letter of intent, please provide an 8-10ft decomposed granite path of approximately a 1/3 mile around the apartments.
6. Please provide a pedestrian easement along the southerly property line along Wilson Canyon Road for a potential creek access path.
7. This proposal may exceed the Wastewater Reclamation Plant's allowed committed capacity. P&Z and City Council must approve an increase in current plant capacity in order to approve this project. Please request this expansion as part of the proposal and development agreement.
8. Please provide a stop sign at the Jordan exit, and 2 stop signs on either side of Quail Tail Trail.
9. Please provide arrows or signage for the apartments to use the Jordan exit rather than using Quail Tail Trail to Wilson Canyon.
10. Please extend the sidewalks between the two parcels to connect the east and west sides of the development, and add cross walk striping on Quail Tail Trail.
11. Please provide 1 ADA parking space per 25 spaces.
12. On the preliminary drainage report, please show a delineated watershed map of the 14.3 acres.

Prior to Issuance of Building Permit:

- For projects involving grading of more than 5,000 cubic yards, a haul plan, a dust control plan, a topsoil reutilization plan, a stormwater pollution prevention plan, and a traffic control plan shall be required. Each must be acceptable to and approved by the City Engineer. (DREAM 3.1.H.6.i).
- For projects involving grading of more than 5,000 cubic yards, an assurance bond is required per DREAM 3.1.G.1.
- Assurance bonds are required for all subdivision construction projects.
- Provide Final Grading and Drainage Plans. The Site Plan shall meet the requirements of DREAM Chapter 3.1.
- ADEQ permits for stormwater general construction permit and construction of wastewater facilities shall be obtained.
- Provide the Final Drainage Report.
- Applicant shall follow the City of Sedona Land Development Code in its entirety.
- Applicant shall provide a Storm Water Pollution Prevention Plan. SWPPP measures shall be in place prior to the start of construction (DREAM 3.1). Storm water quality measures shall also comply with City of Sedona Code requirements (City Code Chapter 13.5)
- Accessible sidewalks and parking areas will need to meet the current US Dept. of Justice ADA requirements.
- Accessible parking/signage shall meet the requirements of the City LDC and DREAM documents.
- All concrete within the City ROW shall be colored "Sedona Red" (Davis 160 color).

Re: City of Sedona Development Applications

Molly Spangler <MSpangler@sedonaaz.gov>

Mon 4/5/2021 11:20 AM

To: Cari Meyer <CMeyer@sedonaaz.gov>

Cari,

How is this?

- 4.2.21 The mission of the economic development program for the city of Sedona is aimed at diversifying Sedona's economy. To work towards this mission, we focus business development and jobs that pay above median wages. Routinely, Sedona businesses state their biggest impediment to sustaining and/or expanding their business is workforce. Further, they state the number one issue to retaining and attracting quality employees is the lack of diverse housing options inclusive of rental housing and affordable housing.

This project will create 84 rental units designed for the local residents and local workforce. The units will be targeted to households earning up to 80% or less of area median income. The units are intended to be longer term housing and will be limited to leases no less than 90 days with no allowance to sublease by the tenants.

Molly Spangler, EDFP, AZED Pro
Economic Development Director

Economic Development Department
102 Roadrunner Dr.
Sedona, AZ 86336
mspangler@sedonaaz.gov
(928) 203-5117

City business hours are Mon-Thurs 7 a.m.-6 p.m.

Public safety 24/7

Join the Economic Development news and calendar lists - unsubscribe at any time. Follow this link:

<http://www.sedonaaz.gov/community/news-information/enotify-sign-up-for-news>

From: Cari Meyer <CMeyer@sedonaaz.gov>

Sent: Tuesday, March 16, 2021 12:11 PM

Subject: City of Sedona Development Applications

Eco Dev comments for Jordan package

Molly Spangler <MSpangler@sedonaaz.gov>

Tue 6/22/2021 12:50 PM

To: Cari Meyer <CMeyer@sedonaaz.gov>; Mike Raber <MRaber@sedonaaz.gov>

Cc: Sean Brooks <SBrooks@sedonaaz.gov>

Cari and Mike,

See below. Let me know if it's inaccurate or needs rewording.

The mission of the economic development program for the city of Sedona is aimed at diversifying Sedona's economy. To work towards this mission, we focus on business diversification, business and workforce development, and jobs that pay above median wages. Routinely, Sedona businesses state their biggest impediment to sustaining and/or expanding their business is lack of available workforce options. Further, they state the number one issue to retaining and attracting quality employees is the lack of diverse housing options inclusive of rental housing and affordable housing.

The lack of rental properties at an affordable, sustainable price point, could have devastating consequences for the business economy of Sedona. This issue impacts the residents, workforce, the businesses, and Sedona's amenities. The lack of rental housing means that the workforce either lives outside of the community or chooses to relocate altogether to another community. The increased housing costs contribute to longer commutes for workers, which leads to increased traffic and road congestion and higher pollution levels.

The 2020 Five-Year Housing Action Plan's first objective is to "encourage development of affordable housing units that meets the needs of low and moderate income households". Additionally, there is a demand for market-rate apartments because currently there are so few rental units available. This project will address both of the needs.

The Jordan Lofts project will create 84 rental units designed for the local residents and local workforce. A minimum of ten units will be targeted to households earning up to 80% or less of area median income. The units are intended to be longer term housing and will be limited to leases no less than 90 days with no allowance to sublease by the tenants. By limiting the leases to no less than 90 days and no allowance to sublease, we mitigate these units being turned into short-term rentals which is already exacerbated in this region.