MISSOULA REDEVELOPMENT AGENCY

CONDENSED WORKING MEETING MINUTES

August 24, 2023

FINAL

A *Working Session* of the Board of Commissioners of the Missoula Redevelopment Agency was held on Thursday, August 24, 2023 in the Hal Fraser Conference Room, 140 W. Pine St., and via Microsoft Teams at 12:00 p.m. Those in attendance were as follows:

Board: Karl Englund, Ruth Reineking, Melanie Brock, Tasha Jones, Jack Lawson

Staff: Ellen Buchanan, Annie Gorski, Annette Marchesseault, Tod Gass, Jilayne Dunn, Maci MacPherson; Lesley Pugh

Public: Nevin Graves, Habitat for Humanity of Missoula; Colin Lane, MMW Architects; City of Missoula: Dale Bickell, Emily Harris-Shears

CALL TO ORDER

12:00 pm.

INTRODUCTIONS

PUBLIC COMMENTS AND ANNOUNCEMENTS

There were no public comments or announcements.

DISCUSSION

Working Session on Workforce Housing Guidelines *(Gorski)*

Staff Memo | Draft TIF Workforce Housing Guidelines | FAQs | Power Point

Gorski said a Workforce Housing Working Group was created to work on ideas and options related to workforce housing. New language was added to State statute following the 2021 legislative session that allows Tax Increment Financing (TIF) to be used for workforce housing. The Working Group included Gorski, Buchanan, Reineking and Lawson from MRA, as well as Emily Harris-Shears, Dale Bickell and Mayor Hess from the City. Harris-Shears is the Senior Housing Policy Specialist for the City's Community Planning, Development and Innovation (CPDI) Department and was a very helpful member of the team in helping understand the needs she is seeing in terms of requests for funding for other programs the City has. Gorski said today's focus is discussion only and is intended as a work session. Based on today's discussion, staff will share an informational presentation to City Council's Housing, Redevelopment and Community Programs (HRCP) Committee next week and come back to the MRA Board for consideration in September.

Gorski said language in state statute, before changes in 2021 and 2023, allowed MRA to invest in publicly-owned housing, public infrastructure and deconstruction to support privately-owned housing. Additionally, to help fund acquisition and assembly of land for housing. MRA's total investment to date is just over $17 million in tax increment financing dedicated to housing projects with nearly 2,500 new units of housing.

Gorski reviewed some terms for clarification. Area Median Income (AMI) is the midpoint of a region's income distribution. The 2023 AMI for a family of four in Missoula County is $86,400 according to US Housing and Urban Development. This is the data source the City's housing office uses for income data. Staff would propose that if the TIF Workforce Housing Policy is approved, MRA will utilize it as well. Montana Code Annotated (MCA) is another term frequently used. It is state law and is updated after each Legislative Session. MCA was updated to reflect the 2021 change. The 2023 change resulted in a definition/income range for workforce housing and has not yet been added, but the bill (House Bill 819) has been signed by the Governor. Housing and Urban Development (HUD) is the federal agency responsible for national housing policies and programs. HUD publishes annual income data for Missoula County and is typically published in May each year. Missoula Organization of Realtors (MOR) provided a lot of the data in Gorski's presentation related to housing needs, sale and rental rates.

Gorski spoke about the Legislative changes. In 2021, "Workforce Housing" was added to the definition of infrastructure in the TIF section of the statute. As previously stated, the 2023 change resulted in the definition/income range for workforce housing to include families earning between 60-140% of AMI. Until HB 819 was signed, Gorski said there was no other guidance in state statute related to a definition for workforce housing. The Working Group looked at national agencies like the Urban Land Institute, Brookings Institute and other organizations that define workforce housing. Now that HB 819 is signed, the definition for these workforce housing guidelines has been determined as 60-140% AMI.

The Working Group engaged with a number of stakeholders in the housing and development sectors including lenders, architects, realtors, property managers, etc. They also met with cities around the country that operate affordable housing incentive programs. Staff met with 28 individuals and work groups to get input on ideas and options. Gorski said the International Rescue Committee recently announced the situation for housing has grown so difficult in Missoula that they have requested a pause on new refugee arrivals. This is the first time the Committee has seen that since 2016 when their partnership with Soft Landing Missoula began.

As stated earlier, the median income for a family of four in Missoula County is $86,400. The median home price, according to MOR, is $529,000. A family of four in Missoula must earn between 200-240% of AMI, or $172,000-$206,000, to afford a median priced home. That assumes the current interest rate of just over 7%. For rentals, MOR data shows a family of four must earn about 80% of AMI, or $69,000, to afford an average priced three bedroom apartment in Missoula. Gorski said the largest gap in housing supply in Missoula County are homes priced between $300,000-$450,000. MOR data also shows that 97% of homes sold in 2022 in Missoula County cost more than a family earning Missoula's AMI could afford. Because of current housing costs, many Missoulians are paying more than 30% of their income for housing. The typical industry standard is no more than 30% or a family is considered financially burdened. Gorski said she looked at August 2023 active home listings in Missoula and 14% of them were attainable for families earning less than 140% AMI. Gorski spoke to public funding available to build new housing in Missoula. Current available sources are low-income housing tax credits, US Housing and Urban Development (HOME funds) and the City's Affordable Housing Trust Fund.

Gorski reviewed the Draft TIF Workforce Housing Guidelines. The Working Group recognizes it may not be perfect on the first try. It is the best set of recommendations based on the research and analysis that was done. The recommendation is to call it a Pilot Program so that staff can work through the guidelines on some real projects in the coming year or two. Staff will report back on how it is going along with any recommended modifications.

Gorski highlighted the key pieces in the Guidelines. There are four areas outlined that have been determined for TIF to be most impactful in a project. Developments may be eligible for one of four TIF investment options, and any exceptions would need to come to the MRA Board for approval. The areas include construction of brick and mortar to help bridge a funding gap created by including income-restricted units, purchase of land or buildings upon which workforce housing units will be constructed, soft costs associated with a workforce housing acquisition/construction/improvements, and interest rate reduction for workforce construction or improvements of up to 50% of a permanent loan. Gorski said in talking with the development community and in particular market-rate developers that have not built income-restricted units in the past, it was determined there may need to be some support on the monitoring piece to ensure income-qualified buyers meet the requirements. She went on to review the investment guidelines and requirements outlined with the key pieces that would go into them, noting that the requirement for 10% payment to the Affordable Housing Trust Fund is only for private projects granted over $100,000 in TIF assistance that do not include income restricted housing. It would not apply to any projects receiving less than that.

Gorski said "for sale" projects not using a Community Land Trust (CLT) model must remain affordable for 75 years. Jones asked if those time frames are found in other towns and cities. Gorski said they are. She said the other piece is that MRA is aligning with the City's existing practice in terms of affordability requirements. 75 years is something the City is targeting for housing projects now through CPDI, but it is negotiable. Harris-Shears concurred and said they start with the longest period of affordability they can achieve in line with other communities. If there is a variable in the project it can be negotiated. For "for sale" they are doing 75 years and for rentals they are doing 30-35 years, but is dependent on the loan terms and can be negotiated. Jones asked for clarification on if the time is negotiable or not. Harris-Shears said really all of CPDI's work is negotiable because they are working towards the mission and goals for affordable and income-restricted housing, and realize every project is different. Buchanan said one of the things the Working Group did is try to do is maintain as much flexibility as possible as opposed to a formal and driven approach to this. She said their recommendation is that the terms can be negotiable with approval of the Board. Jones said the document says "affordability guaranteed by requiring a minimum" which does not speak to negotiable. Buchanan said that is one of the reasons this discussion is happening and that language can be changed. State law does not allow anything to be required in perpetuity except if it's in a CLT. Jones said the Pilot Program would allow for the possibility of a project to come to MRA that would only be restricted to a 15-year affordability period. Gorski said that's up for discussion today. Buchanan said there are several things in the document that could change from today's discussion.

Lawson said in the Working Group's conversations they did not talk about negotiated. They are proposing that these timelines be required. He said Harris-Shears mentioned negotiated because that is what the Affordable Housing Trust Fund (AHTF) is doing. Every aspect of the Draft Guidelines is for deliberation. Buchanan said one of the things that really enters into the aspect of negotiability is what is going on in the financing industry because it is changing right now. Whereas previously someone may have been able to get a 30 year loan on a project like this, some banks are maybe going to 25 years now.

Gorski said the last piece in the Guidelines is the TIF Infrastructure Grant. The existing TIF Infrastructure Grant would remain as is except for the AHTF requirement of 10%. A development team could come in and seek assistance for those typically eligible items (sidewalks, utilities, deconstruction) and workforce housing if the public benefit and available funding were there. Gorski highlighted that if the AHTF requirement were in place in 2000 it would have generated approximately $4.9 million to date for that fund to put back into housing in Missoula.

Gorski opened the Guidelines up for discussion and said based on today's discussion and the Board's comfort, staff will present it to Council Committee next week. Staff intends on coming back to the Board for approval next month if everything is ready. MRA will then work to do outreach and education to raise awareness of the program. Staff has already talked to developers and builders that are interested in inviting a group of developers and builders in that have not typically accessed TIF to try to make sure they understand the program and what the priorities are. Staff would continue to work with projects and try to get some pilot projects to work through and test the guidelines. Reineking thanked Gorski for all of her work on this.

Brock referred to the "Requirements" section of the Guidelines and asked if the 10% AHTF requirement refers to only housing projects or all projects over $100,000. Gorski said the way it is written now it applies to all projects. Jones asked if they would pay up front or if it would come out of the reimbursement from MRA at the end of the project. Gorski said the Working Group desires that those funds come from the developer and not MRA at the time of reimbursement when the project is complete.

Brock asked about the MRA contract with a third-party entity to conduct the income verification. She asked who does that and if they have capacity. Buchanan said MRA has done it on past projects with the Missoula Housing Authority (MHA). Brock asked if MRA would hire MHA to do it and if they have capacity. Buchanan said there are a number of non-profits that can do it. Gorski said staff has been talking with the City's Housing Office and because they are already doing monitoring and income verification for the AHTF and HOME, they have shared that they do have capacity on the rental side and have a model established on how to do it. She said on the "for sale" side staff has talked about issuing a joint Request for Proposals (RFP) where the entity that's selected could be hired to help the City do the income verification for the AHTF and also for MRA. Lawson said the Working Group heard from a lot of private developers that they just don't have the capacity or desire to do the income verification along the life of the affordability period. Englund asked if the income verification entity would be working for MRA or the Housing Office or the City. He asked if MRA is taking over the responsibility of monitoring these and for how long. He asked if it is something that should go through the Housing Office. Buchanan said it would almost have to go through the Housing Office because the Urban Renewal Districts (URD) have life spans. Gorski said staff has done some modeling with Harris-Shears to look at what that cost would be over the life of a project. 30 years would cost right around $9,000 to monitor per project. MRA would pay upfront for that and the Housing Office would handle the monitoring. Englund asked if that would be part of the application or something MRA would end up having to do. Gorski said MRA doesn't want it to be a barrier for a developer to apply if they are not comfortable doing the monitoring, so MRA could pay on that or the developer. She said that may be understood through the application process and is not something the Working Group discussed. Reineking said a company like BlueLine Development is used to and comfortable doing their own monitoring, but they might want to get paid for it if MRA is paying for it. On the other hand, they may come in and say they can do it.

Brock said Midtown is looking at how to keep mobile homes in URD III because there are young professionals living in them right now and are at risk for displacement because they don't own them. She asked if co-op models would be able to apply for the AHTF as a result of this, as the Guidelines seem like they're geared more towards creation and development of new, not preservation of existing. Gorski said staff received guidance from the City Attorney's Office that to align with state statute, the opinion is that MRA should focus its program on construction, improvements and acquisition. Preservation could be something that would work with the Housing Office. Buchanan asked how it fits with a project that was identified as a multi-family building that is currently at market rate and the developer wants to buy it and improve it, and dedicate it to workforce housing. Harris-Shears said that would be considered acquisition because it is in the market now. It would be acquired and brought into an affordability. Brock asked if there should be one bullet that specifically says those sort of projects are eligible because the overall tenor of the Guidelines makes it sound like its a new construction sort of policy. Brock also thanked the Working Group for their time on this.

Bickell referred to the preservation conversation. He said the example from Buchanan states the housing is technically market because they are not currently restricted. He said those ones fall into the acquisition category potentially if something is going to be moved from market rate to workforce housing. Englund said if he had an apartment building and was renting units at below workforce rate, he would be eligible if he wanted to fix it up or sold it and someone else wanted to fix it up because of the fact that he's renting it now at below workforce rates because that would be considered an improvement or acquisition. Bickell said that would be a good example of the possibility of negotiating the time period for affordability.

Brock asked if NeighborWorks and North Missoula Community Development Corporation (NMCDC) were working on a project and wanted to acquire a trailer park and move it into a co-op model, would they be eligible for the same TIF funding or do they not even need to come to MRA because they go right to the AHTF that will be bolstered from these projects of new housing. Gorski said she thinks MRA will be working closely with Harris-Shears and the Housing Office team on projects to try to maximize the use of resources that are available. Harris-Shears said both NeighborWorks and NMCDC are eligible to do acquisitions now through the AHTF. The main challenge with the AHTF now is that it is not funded to meet the demand they're seeing for projects in the community. She said with this match component, in a way, through the MRA investment, they will be able to fund more projects like acquisitions of trailer communities. She said they are doing one right now with NeighborWorks and NMCDC in the River Road Neighborhood, and just completed one on the Northside. She added that depending on the project and the specifics, it could be eligible for both the Workforce Housing and AHTF. She said the great thing is that Gorski has been very dynamic in working with all of the partners, herself and the Housing Office. They will be able to work well together in identifying where the best source of funding will come from.

Buchanan said there may be gap funding needed to acquire a mobile home park that exceeds what the AHTF can put in and what the residents there can finance. She would think MRA would consider gap funding in a situation like that. Jones said while they could be creative in defining acquisition, common perception would not see that as being within the definition of acquisition. She said a cleaner approach would be to say that someone who owns a project that is willing to encumber it for the purpose of affordability could be eligible. Either they define acquisition very clearly and educate the public that it's part of the definition of acquisition, or they add another bullet with another category of eligibility. She said the public needs clear communication to say they might be able to do it.

Jones asked if MRA will be in a position to accept projects this fall. Gorski said staff needs to finish putting an application together. She has talked with MacPherson about putting together a webpage where information can be posted. She guessed MRA could be ready to start getting applications this fall. Jones said that is wildly exciting to have the concept here now with the idea MRA can get applications in the coming months with projects on the ground.

Jones said she is concerned about the requirement of 30 years and 75 years. She said she would personally advise against having that be a requirement. She said it could be set as a default with the possibility of a variance or the goal. She said she doesn't have any data or experience, but feels it would be a disincentive to most developers to say they have to tie their property for 30 or 75 years on rental versus sale. Gorski said as another data point, the Housing Tax Credit Program in Montana just went to a 50 year affordability requirement for rentals.

Buchanan asked how the term of the loan in building rental product impacts the decision to go into a program from a financial standpoint. She asked if that makes it challenging to refinance after 25 years. Lawson said he doubts it will be critical at the 25 or 30 year marker. He said the longer the term and the lower the subsidy, the harder this is for a developer to pencil. Lawson said the 30 and 75 years being proposed are not atypical of subsidized workforce/affordable housing projects elsewhere. He said he likes the idea of having some flexibility. His concern is the burden on staff of negotiating every project similarly. Englund asked what happens if they make it a goal, similar to MRA's 1:10 rule of public to private dollars. Lawson said the idea is that this is the goal, and if a developer comes forward and says they are meeting the spirit of the program and delivering workforce housing, but then gives the reasons why it won't work for their project. Jones said her concern is not a project like Villagio Apartments where they have tons of units and are in the game and it's easy for them. Missoula does not have big chunks of land for projects like that. She said the exciting part of the Workforce Housing Policy for her is the smaller projects like a four or eight plex, along with the infill projects. Those are the folks where penciling this on being encumbered for 30 or 75 years might be a deterrent. She said the possibility of flexibility would be advisable to her. Reineking said she would advocate for leaving them in the Pilot Program as a requirement and finding out where the problem is. She said rather than calling it a goal and assuming it is going to be negotiated, if it is in there as a requirement and it turns out that an exception needs to be made, then it comes to the Board and they're all aware of where the exceptions are consistent and the program can be modified. Englund said as long as it says somewhere in the document that MRA has the authority to do that. Jones added as long as it doesn't need to go back to City Council to change the Pilot Program. Buchanan said this is going to City Council as an informational item and that is why it is a Pilot Program. City Council has already set the policy that they want to build income restricted housing. Englund asked if it is clear that if the numbers are in there hard that the Board has the ability to change it. Gorski said it is written in there that any exceptions must be approved by the MRA Board and she will move it to the top of the document so it applies to the bulk of the guidelines.

Jones asked Harris-Shears if the Housing Office is granting variances from these types of restrictions routinely or not. Harris-Shears said not typically. They are typically working around whatever the barrier is and figuring out if more subsidy can be added or address the barrier to the period of affordability in another way. They see the trade off being that the developer is committing the housing for a period of time while the AHTF investment being made is making their loss whole. She wanted to emphasize the Housing Office's goal is to figure out how to get the projects off the ground and shovels in the ground and people moved into the homes. If there is a barrier to that they will explore whether there is an exception or variance needed. They also have firm language around what their guideposts are for what they want to see around periods of affordability. She is working with a couple of developers right now and said the period of affordability is not the biggest concern for them, it is something they are working through and having conversations about.

Englund said in terms of the use of TIF funds, it can be one of the four but not a combination. Gorski said yes, unless the Board approves an exception. Englund referred to the example in #8 of the FAQ's with the gap of $69,844 per unit. Hypothetically, he said if he was thinking about doing a project and wanted to build 10 units and was using the numbers in the example he would be able to get roughly $700,000 in TIF. He said in his application he can decide whether he wants that as reimbursement for bricks and mortar or the purchase of the land or the soft costs or an interest rate reduction. If he says he wants to use it for the land he will not have to pay Davis-Bacon wages. If he wants to use it for reimbursement for bricks and mortar he does have to pay Davis-Bacon wages. Englund said he doesn't understand why, if MRA is putting money into a project, MRA shouldn't be requiring Davis-Bacon wages for everything. Gorski said the intent at the Working Group level was that state prevailing wage requirements would apply to any of these pieces. They didn't want to create a situation where developers incented to pick the one that doesn't require prevailing wage. Gorski said she will add that state prevailing wage is required for the part of the project that receives MRA funding.

Englund asked about the section under Investment Guidelines stating that MRA staff has the sole discretion to administer the guidelines and how to use them. He was unclear on that because it is the Board that has the discretion to determine, not the staff. Reineking said it may suffice to just delete that sentence. Gorski said the City's Attorney's Office said it needs to be clear that as MRA works through a Pilot Program and the application is being put together there may be some discretion as the application is reviewed in terms of how that information fulfills the criteria. Lawson asked Englund if his point is that the Board has the ultimate ability to determine whether the Guidelines have been met. Englund said yes. Jones said she agrees the sentence should be deleted.

Englund asked about the exceptions to the 10% contribution to the AHTF. One says "deconstruction only TIF requests" and he thought that MRA had gone as far away as it could from "deconstruction only" TIF requests. He said the Board has turned those down in the past. Buchanan said what it is trying to say is that deconstruction is the only piece of the project that is applying for TIF assistance. She agreed MRA does not pay for speculative deconstruction. Englund said he doesn't want it to open the door to people thinking that according to the document, MRA is okay to tear their building down even though they have no clue what they will do when it is redeveloped.

Englund asked if the Pilot Program should have a two-year end date. Gorski said staff will commit to coming back on a regular basis with updates. Jones asked if there are any projects for the Pilot Program. Gorski said staff has been in talks over the last nine months with several developers with projects. She thinks there may be one that may come to the Board this fall. Right now interest rates, finance environment and lending criteria are creating some challenges.

Reineking noted it is important to keep in mind that the goal is to increase the amount of workforce housing, not low-income or 60% below AMI because there are other funding sources for that. Increasing that supply will allow elasticity in types of housing that people live in. There is a potential that this could eat up a lot of TIF funds and is something MRA will have to consider going forward. She said MRA needs to make sure they are all talking about the public benefits of this when the interest write-down goes to a bank or the gap funding goes to the developer. Buchanan agreed and said it's one thing to give these funds to non-profits like MHA, but when it's a private developer it needs to be clear. Missoula needs to get the private sector in this game. Englund said that is a great point and the benefits are obvious when a nurse or teacher can't afford to buy a house or rent a one bedroom apartment. Reineking said it is obvious to those who have been funding housing projects for decades, it's not always immediately apparent to people who see MRA giving money to banks. Brock added she also likes the secondary benefit of hopefully getting commercial retail projects into the mindset of putting workforce housing on top of the building. She said it's one thing to say you want mixed-use buildings, but until there are more incentives sometimes it's hard to even imagine adding workforce housing into the mix.

Englund asked if someone were to do a big project and include some workforce housing, the 10% would not apply. Gorski said that was correct. If someone does a big project with no workforce housing then it applies.

Lawson had a correction on page 1 of the Guidelines draft. He said eligibility is not just individuals, it's households. Gorski said that was correct. Lawson said he expects MRA will be talking about this program frequently moving forward. If not, he thinks staff and Board should commit to a look back in October 2024 to see what is working and what isn't.

Bickell said one way he thinks of the AHTF if not necessarily to get cash in there, it's how the City is changing everything to align with its goals. This is part of that and in the basket of tools the City can have moving forward with housing goals. Reineking said to keep in mind the goal of this is not to fund the AHTF, it is a side benefit. The main goal is to create workforce housing.

Colin Lane, MMW Architects, said his guess is that this does primarily fund the AHTF. He thinks the 10%, for a lot of projects, is not a big enough penalty to force those kind of mixed-use projects. He still loves the guidelines and where this is heading because he thinks funds for the AHTF is a great thing. As a developer, they're potentially looking at a subsidy from the MRA that just covers the costs of that gap only. If it covers the gap only then maybe there is no real way for it to cover the risk associated with the 30 and 75 year periods of affordability. Lane said that risk is not quantifiable. He doesn't imagine the Board would want to cover imagined risk. As a developer, if he is stuck with that risk he's looking at the off ramp pretty seriously.

Englund was curious if there is a way to cover not just the costs, but also a certain number of years of lost profit. Lawson referred to Gorski's comment that there will be in that gap funding the funding of some overheads, they're talking about the reasonable profit rate. He said the Working Group talked about this a lot. In a development, if they're only covering the costs, the developer probably would get on the off ramp every single time and pay the 10%. The expectation, although a magical number isn't written in, is that between costs of production and the AMI target, there is a reasonable return in there. Lane said that helps, but there is still risk and unfamiliarity. He said if he is a developer he isn't building unless he thinks his baseline works anyway. If a developer builds apartments or condos and there's this offer to do some income-restricted units and in return he gets his hard and soft costs covered, but he doesn't get his risk covered, he decides his regular product works. Englund said the regular product has risk in it, and MRA is saying this doesn't if there is this great demand for workforce housing. Lane said he hopes he is wrong and is excited about the program.

Lawson wanted to understand Lane's comments and understand if his concern is the level of subsidy won't be high enough to incentivize developers? Does he think the requirement to pay 10% into the AHTF, if you choose not to participate or don't build workforce housing, is too low and will make that off ramp a little too easy? Lane said that's it exactly, although if the 10% were higher than developers might start bagging the whole thing which would be the worst outcome. Buchanan said the last thing they want to do is force development out. If it doesn't accomplish anything more than a revenue stream to the AHTF, then they've done something pretty positive in her opinion. Lawson said they also if we're not receiving applications for workforce housing than we will have to take a hard look at the Pilot Program to see what isn't working. Reineking said if MRA isn't increasing workforce housing then the goal hasn't been met. Buchanan said if MRA is creating a revenue stream to the AHTF and that is creating workforce housing then the goal is still accomplished. She said this notion of requiring every private development to add a housing component is not realistic. A bank doesn't want to be a residential landlord in all likelihood. She doesn't know that it is MRA's place to try to force that.

Englund thanked the Working Group and staff for their great work on this. Buchanan said there is one clarification she wanted to make sure everyone was on the same page on. In the Guidelines under Use of TIF Funds for Workforce Housing, #1 "State prevailing wage requirements will apply". She asked if that was for the whole project or just the units providing workforce housing. Gorski said the Working Group's intent is that it applies to the TIF funded portion of the project. Englund said it's just an overall requirement and applies to all aspects, so doesn't need to be stated in each of the requirements.

Harris-Shears added that the City's broad housing policy, A Place to Call Home, also encourages development in neighborhoods to have a role in housing development for all income levels and different housing types. By doing this match component rather than requiring a set number of units, they're also able to diversify where they can invest, not only in the URDs. They see that as a big benefit and tool to be able to meet the broader housing policy goals of the City.

Gorski will clean up the documents based on today's feedback.

ADJOURNMENT
Adjourned at 1:48 p.m.

Respectfully Submitted,

Lesley Pugh

Lesley Pugh