AGE	ENDA INFORMATION
☑ Council Workshop	Date: January 14, 2017
☐ Finance & Audit	Date:
☐ Advisory Oversight	Date:
Other:	Date:



# The District of North Vancouver REPORT TO COMMITTEE

January 9, 2019

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**AUTHOR**: Dan Milburn, General Manager of Planning, Properties & Permits

**SUBJECT:** Pace of Development

#### RECOMMENDATION:

THAT the report titled Pace of Development dated January 9, 2019, from the General Manager of Planning, Properties & Permits be received for information.

#### **REASON FOR REPORT:**

Council members have expressed a desire to discuss pace of development in the District of North Vancouver. This report and accompanying presentation are intended to provide Council with useful background information on the District's historical and projected pace of development.

#### SUMMARY:

Pace of development can be expressed as the amount of development (e.g. number of residential units) approved, under construction, or occupied in a given period of time (e.g. per year). The accompanying presentation includes information on the historical and projected pace of development, in addition to information on active rezoning applications (i.e. instream applications).

Development pace results from a combination of supply and demand influences. For example, with changing demographics (e.g. aging population and increasing immigration) comes demand for new and different housing. It should be noted that local governments have limited tools to moderate the supply and demand of development. For example, private individuals, corporations, non-profits organizations, and other levels of government construct housing, while local governments moderate the supply of housing through policies (e.g. OCP), regulations (e.g. zoning), and development application review processes (e.g. rezoning) which collectively define the amount, type, location, and density of development permitted in the District.

Pace of development has been the focus of many previous staff and committee reports since the OCP was adopted in June 2011. Attached to this report is a chronology of these various reports (Attachment B).

#### **EXISTING POLICY:**

The OCP identifies a number of key issues to address including:

- Challenging demographic profile growing elderly population and a "missing generation" of younger adults 20-40 years in age.
- Lack of diversity and affordable housing housing types, locations, sizes and affordability that did not match future needs (e.g. low vacancy and high cost)
- Loss of economic vibrancy loss of jobs and vibrancy in commercial centres.
- Large environmental footprint a spread-out community with costly and inefficient infrastructure (e.g. transit), resulting in a high reliance on automobile use.
- **Social issues** Lack of active transportation options affecting physical and mental health. Increasing gap between rich and poor and a growth in the homeless population.
- Aging municipal infrastructure and financial challenges Existing aging
  infrastructure and facilities. Lower population growth which limits the District's ability
  to leverage funding through development costs changes and other mechanisms. The
  existing predominant single-family form is not sustainable.

Together with the Vision and Principles, these Goals inform the policies, strategies and targets developed for the District of North Vancouver Official Community Plan.

- Create a network of vibrant, mixed-use centres while enhancing the character of our neighbourhoods and protecting natural areas
- Encourage and enable a diverse mix of housing type, tenure and affordability to accommodate the lifestyles and needs of people at all stages of life
- Foster a safe, socially inclusive and supportive community that enhances the health and well-being of all residents
- Support a diverse and resilient local economy that provides quality employment opportunities
- Provide a safe, efficient and accessible network of pedestrian, bike and road ways and enable viable alternatives to the car through effective and coordinated land use and transportation planning
- Conserve the ecological integrity of our natural environment, while providing for diverse park and outdoor recreational opportunities
- **Develop an energy-efficient community** that reduces its greenhouse gas emissions and dependency on non-renewable fuels while adapting to climate change
- Provide infrastructure to support community health, safety and economic prosperity, and facilities that enhance recreational opportunities, cultural activity and artistic expression

Three Strategic directions were established to address these issues and achieve the goals of the OCP:

- **Balanced and Diverse Population** Facilitate diverse housing choice and vibrant, age-friendly communities with a range of facilities and services.
- Complete, Compact and Connected Communities Establish a network of connected town and village centres that support effective transit, walking and cycling; and focus growth and renewal in four key centres: Lynn Valley, Lynn Creek, Lions Gate, and Maplewood.
- Reduced Environmental Footprint Conserve energy and reduce greenhouse gas
  emissions through compact, connected and "green" communities; and encourage the
  protection and enhancement of our natural systems; become more economically
  dynamic and sustainable; encourage the protection, intensification and diversification
  of our employment lands, and a customer-oriented and business-friendly environment.

Town and Village Implementation Plans and Related Guidelines:

- Lions Gate (formerly Lower Capilano Marine Village) Implementation Plan (April 2013)
- Lions Gate Peripheral Area Housing Policy (July 2014)
- Lions Gate Public Realm Strategy (July 2015)
- Lynn Valley Town Centre Flexible Planning Framework (October 2013)
- Lynn Valley Town Centre Public Realm and Design Guidelines (June 2015)
- Lynn Creek (formerly Lower Lynn) Town Centre Implementation Plan (May 2013)
- Lynn Creek Design Guidelines (January 2016)
- Maplewood Village Centre and Innovation District Implementation Plan & Design Guidelines (November 2017)
- Edgemont Village Centre Plan & Design Guidelines (March 2014).

### Official Community Plan Monitoring

An OCP Implementation Monitoring Committee was created in 2017. The purpose of this Committee was to encourage meaningful community engagement in the implementation of the OCP and to provide commentary and observations, as requested, on elements of OCP implementation, monitoring, and communications with the public. The Committee reported their findings to Council in October of 2018, and the Executive Summary is included with this report as Attachment C.

#### Conclusion:

Pace of development is a key issue for the District of North Vancouver. This report and accompanying presentation are intended provide Council with useful background information for Council's consideration.

## **SUBJECT**: Pace of Development

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Respectfully submitted,

Dan Milburn

General Manager of Planning, Properties & Permits

### Attachments:

**Attachment A: Pace of Development Presentation** 

Attachment B: Chronology of Pace of Development Reports and Presentations

Attachment C: Official Community Plan - Implementation Monitoring Committee:

**Executive Summary** 



## Introduction

## Defining the issue:

- -What is "pace of development" and why is it important?
- -Influences
- -Current policy (OCP, 2011)
- -Historical and projected pace of development
- -Options/Discussion



## Options for Active Rezoning Applications (i.e. instream):

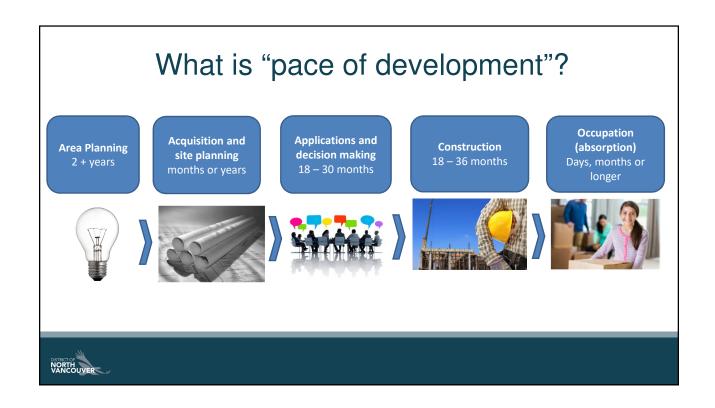
- -Consider proposals on their individual merits
- -Focus on key town and village centres
- Focus on rental housing, affordable housing and care facilities
- Focus on proposals with significant transportation improvements

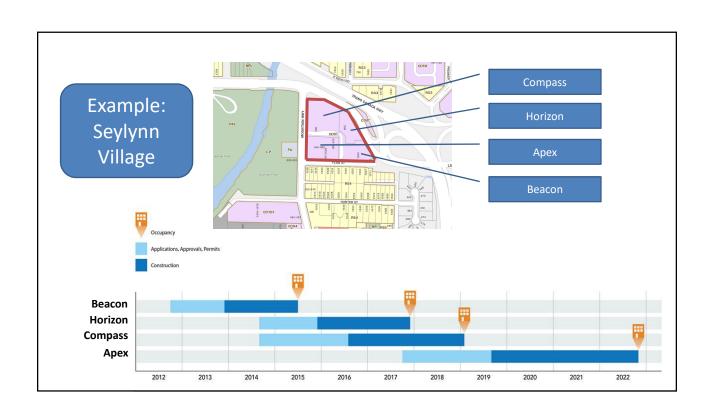


What is "pace of development"?

E.g. Residential units approved, under construction or occupied per year







# Why is pace of development important?



Change, uncertainty and risk (e.g. existing tenants)

Construction impacts (e.g. noise, construction traffic)

Land use impacts (e.g. traffic, character)

Costs and service demands (e.g. capacity)



# Why is pace of development important?

Changing community needs

(e.g. aging population)

Identified issues
(e.g. housing diversity and affordability)

Renewal and revitalization

(e.g. asset life cycle)





# What influences the pace of development?

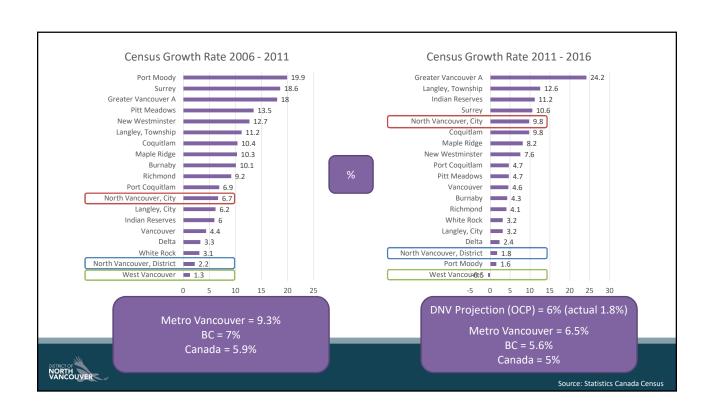
#### Demand: Supply:

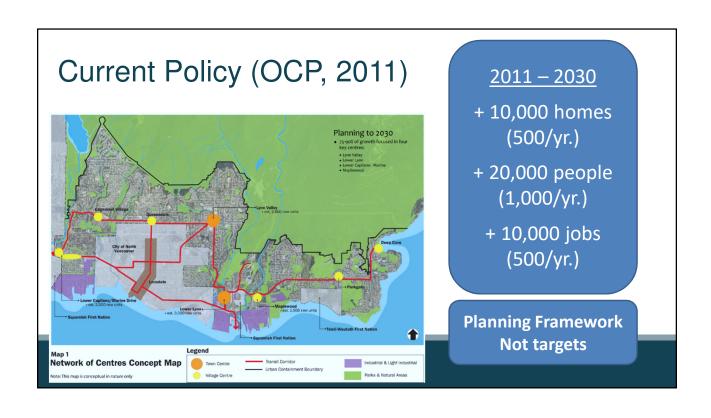
Population change **Employment change** Interest rates Foreign Buyers Tax **Property Transfer Tax** School Tax Mortgage "stress-test" Land supply - vacant, partially utilized, underutilized Market factors - speculation, holdings & settlements Physical limits - environmental sensitivity, hazards Policies - federal, provincial, regional, local

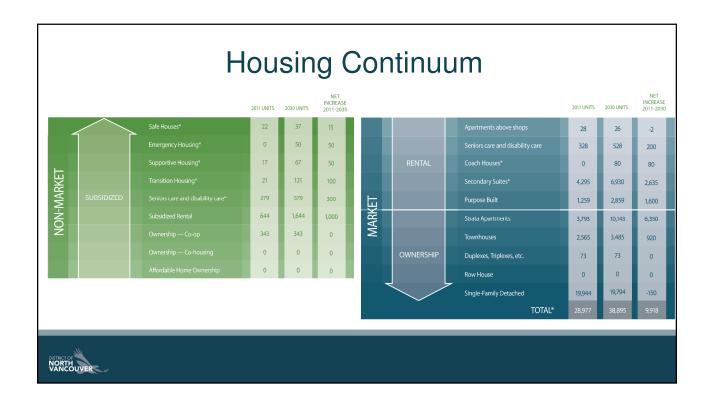
Regulations - Zoning

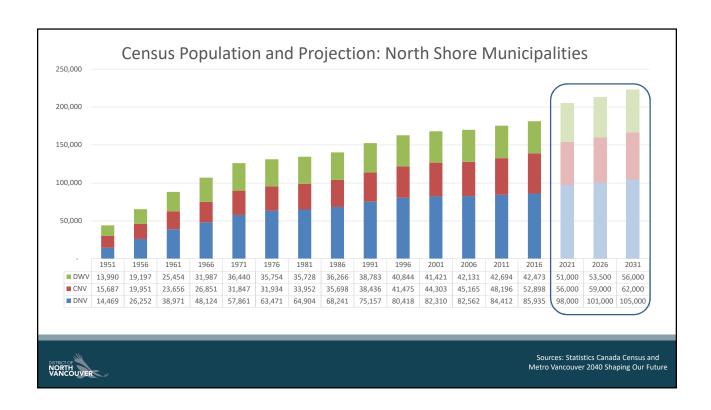
Development review process

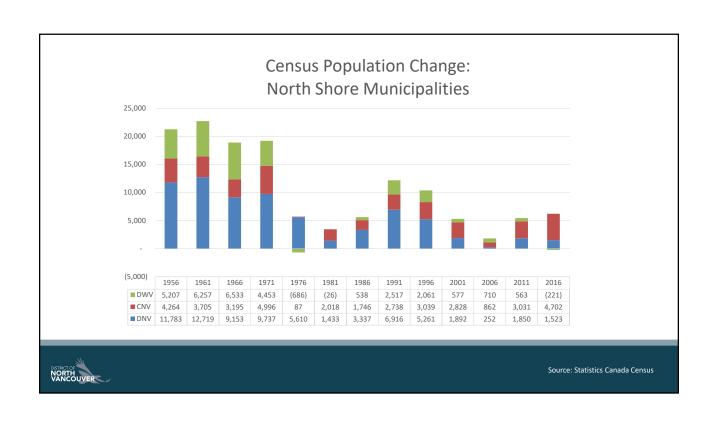










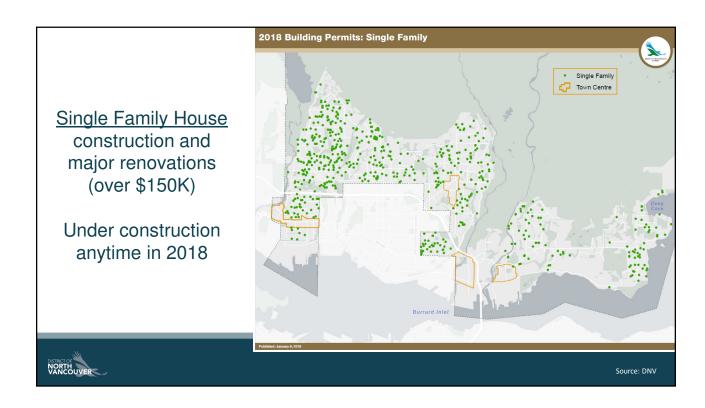


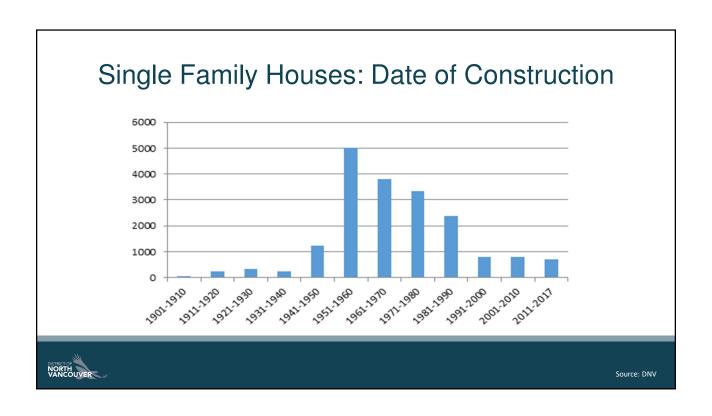
# Historical and Projected Pace of Development

Single Family

Multi-family



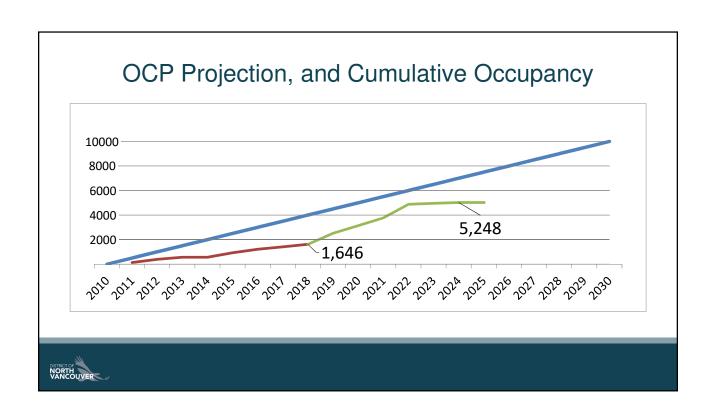


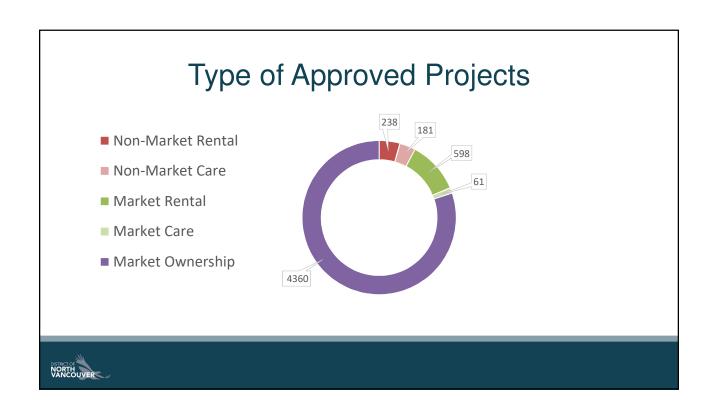


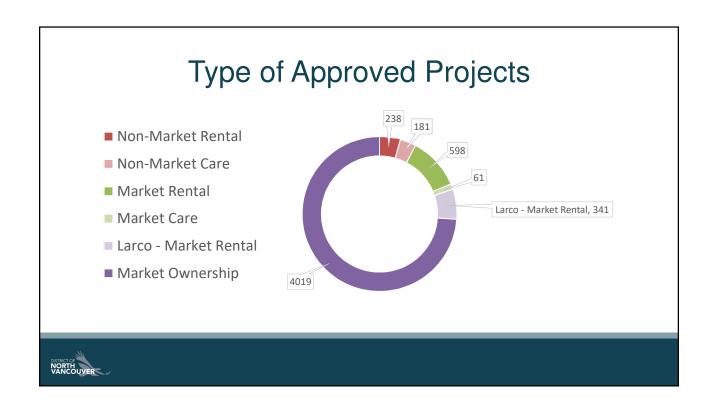
# Historical Pace of Rezoning Approvals and Multi-Family Occupancies

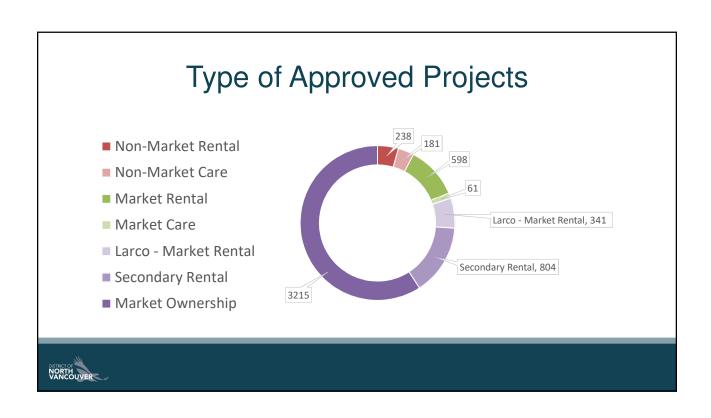
- Net new multi-family residential units approved (i.e. rezoning) since OCP adoption = 4,456 (Average ~ 595/yr.)
- Net new multi-family residential units occupied since OCP adoption = 1,646 (Average ~ 220/yr.)



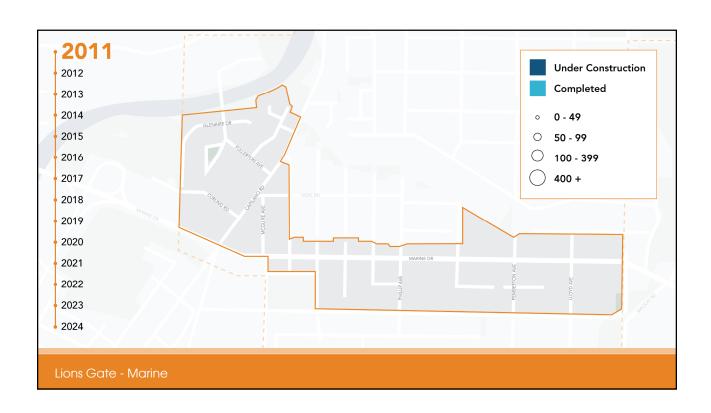


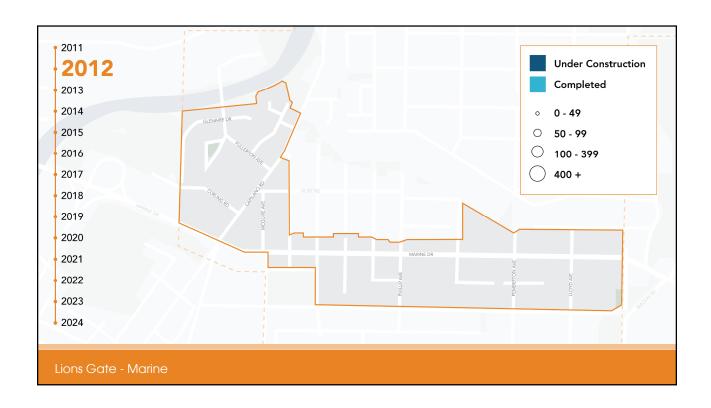


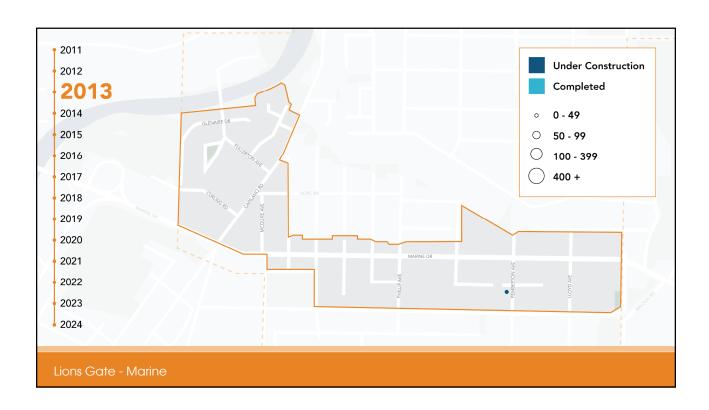


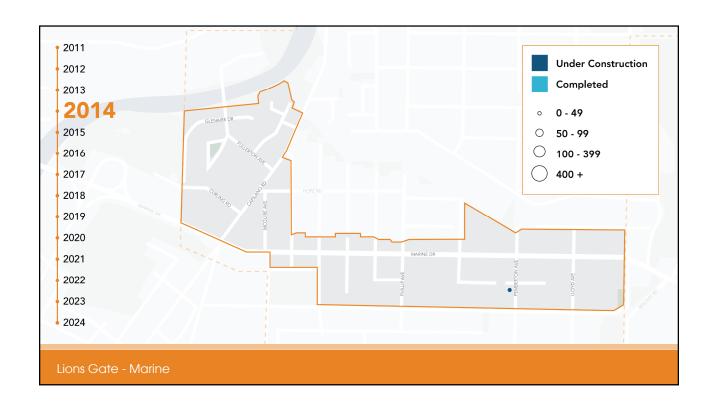


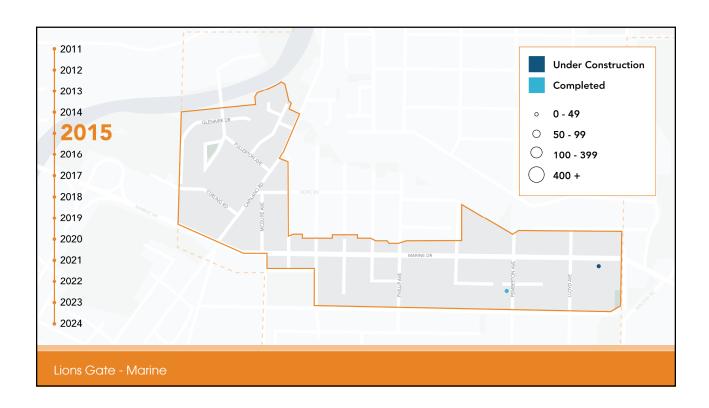
# Lions Gate-Marine Pace of Development



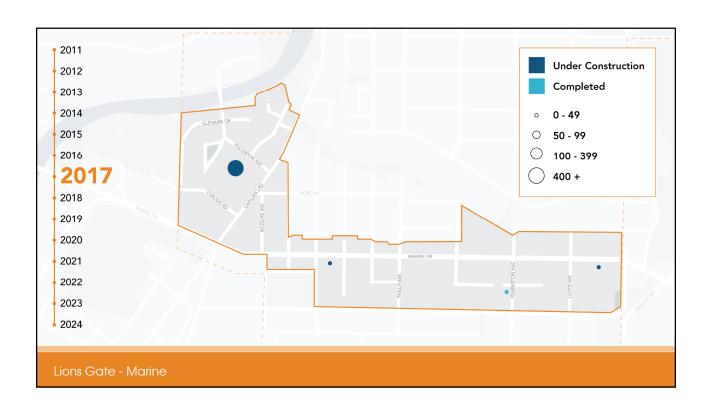


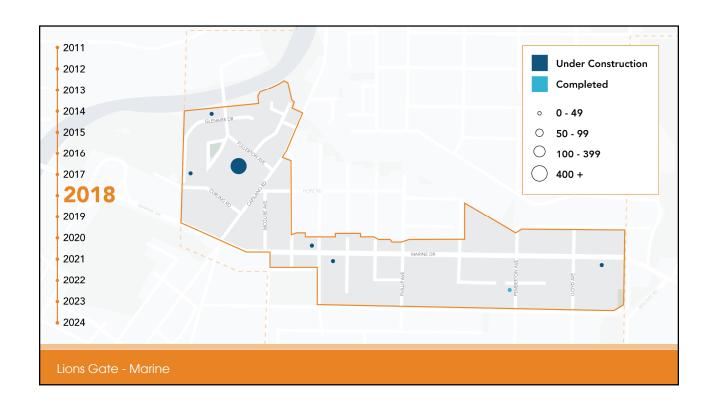


















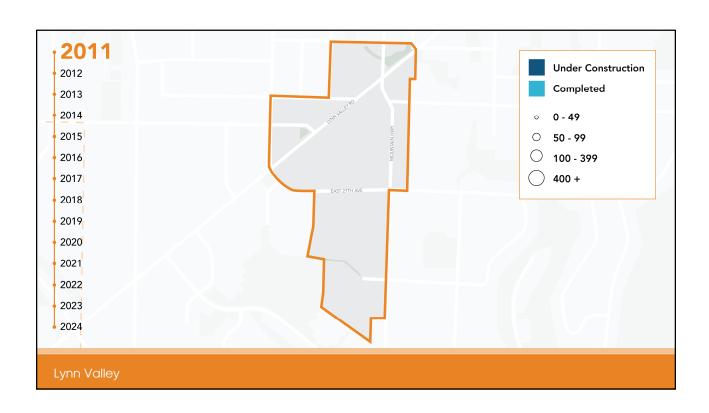


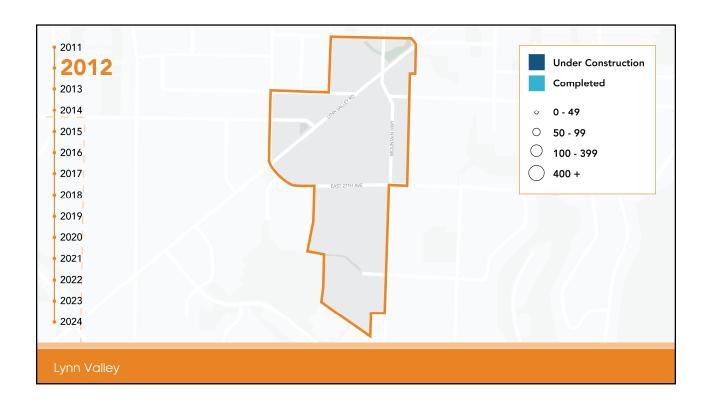


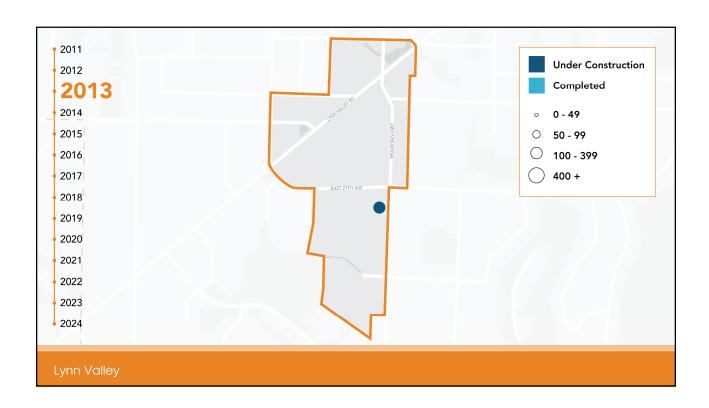


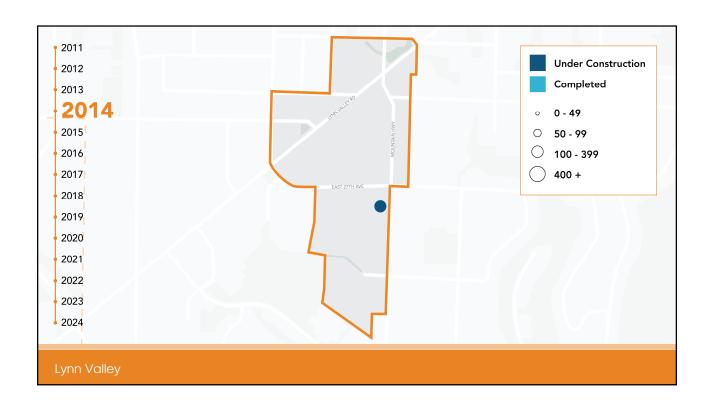


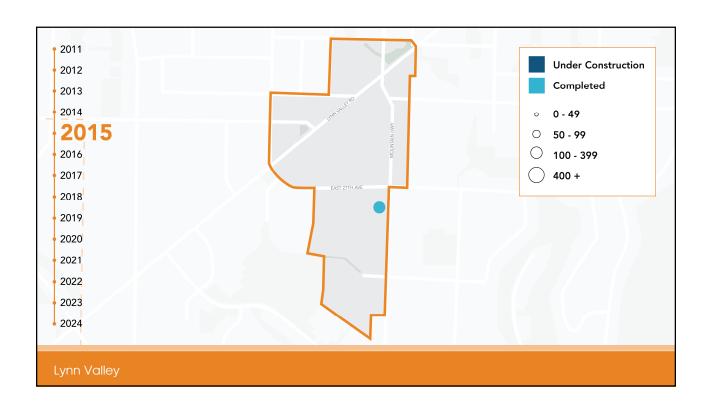
# Lynn Valley Pace of Development

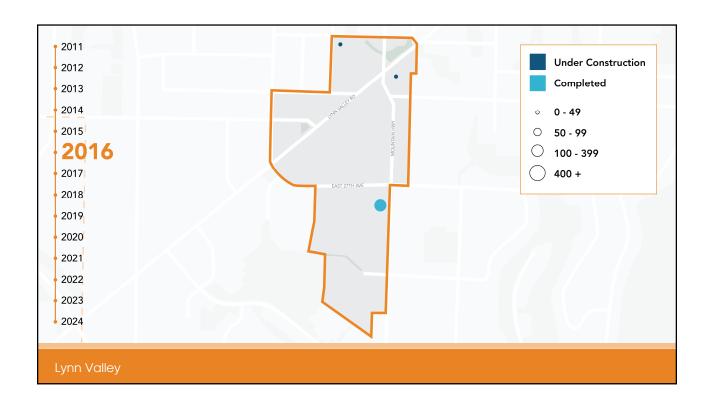


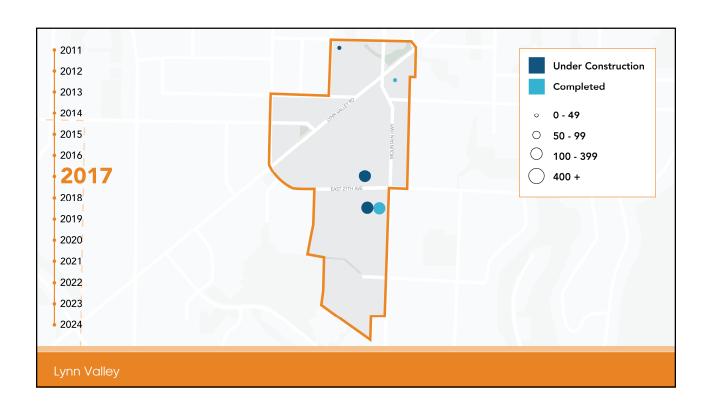


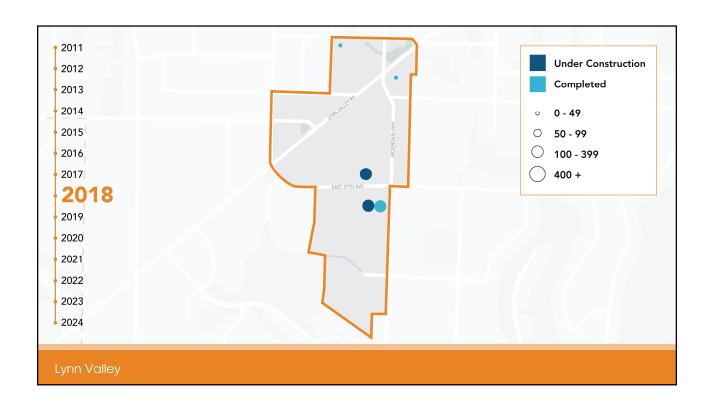


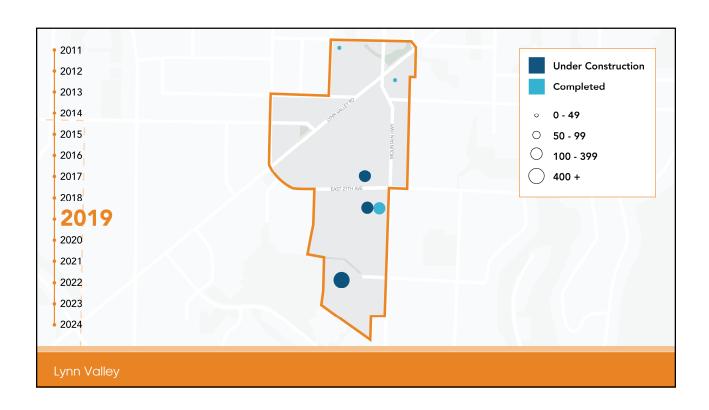


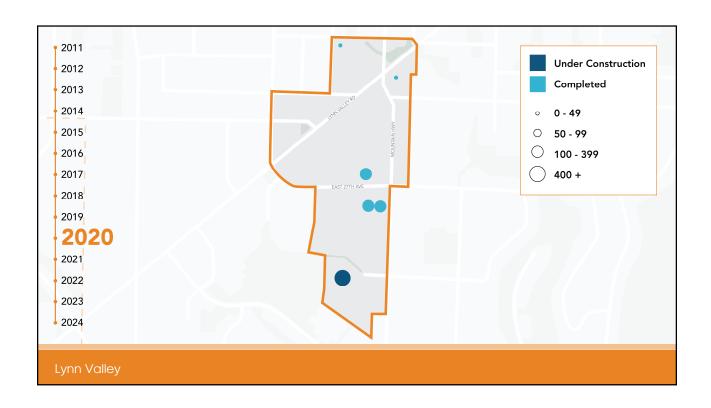


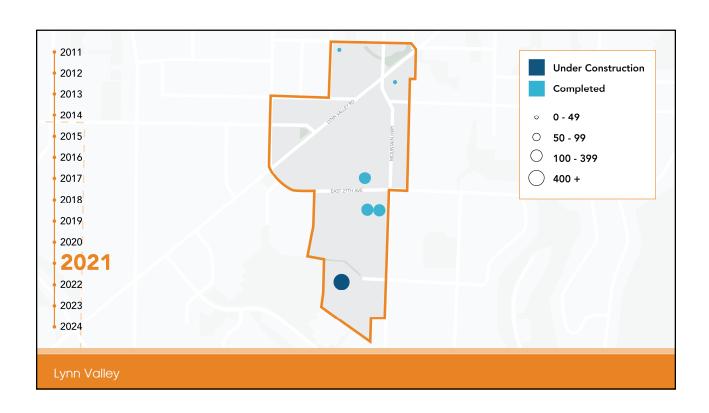


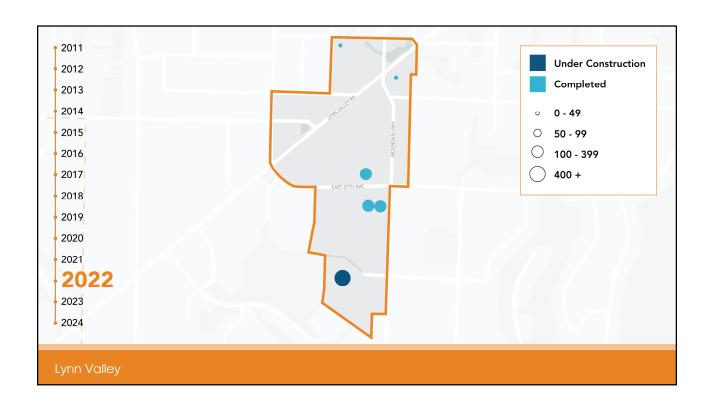


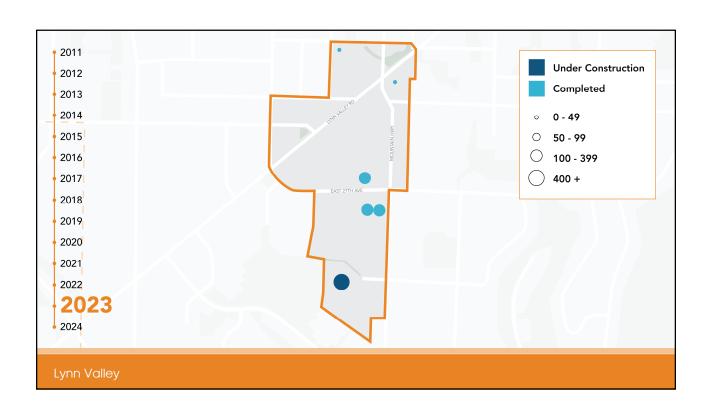


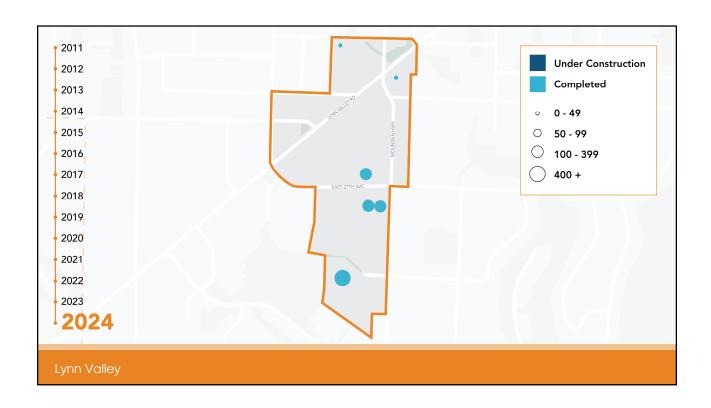


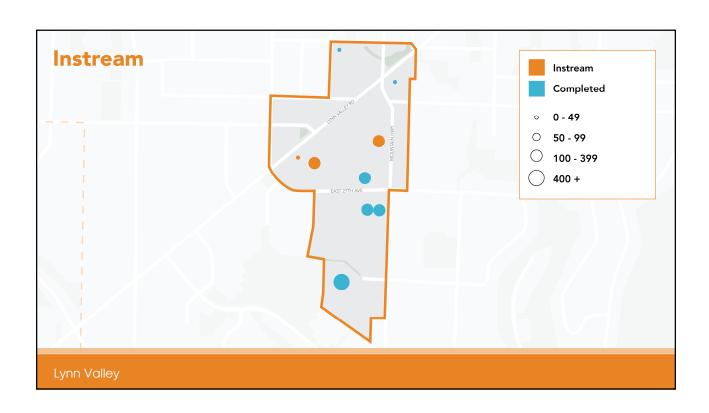




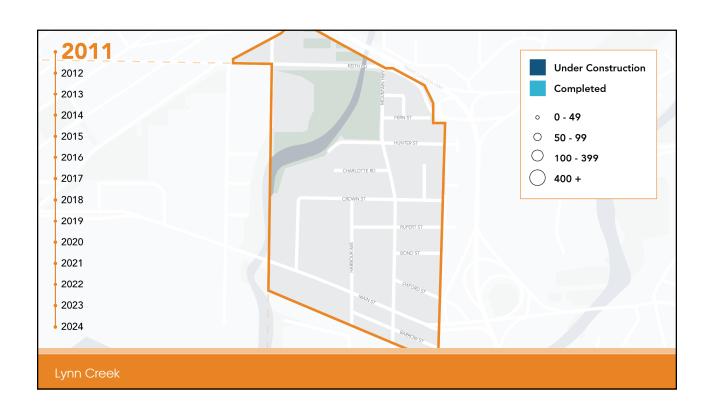


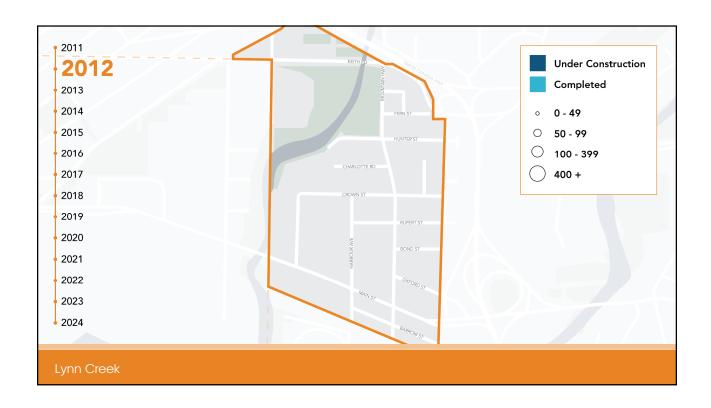


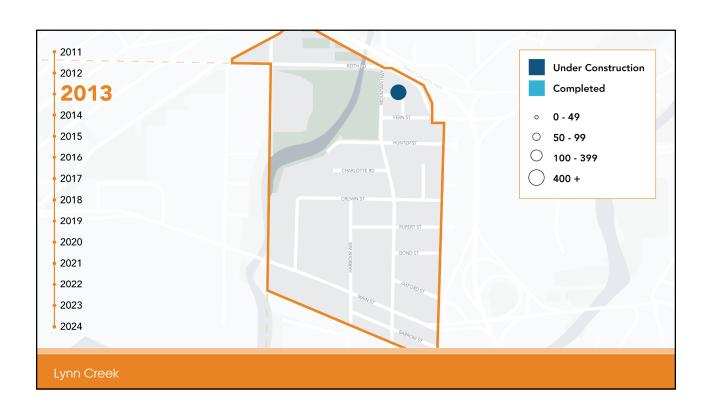


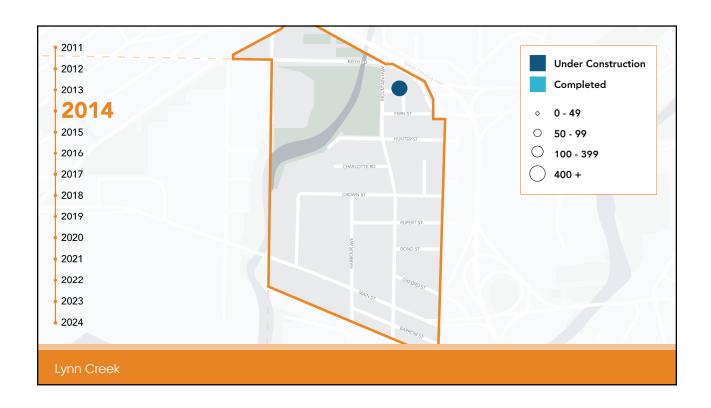


# Lynn Creek Pace of Development

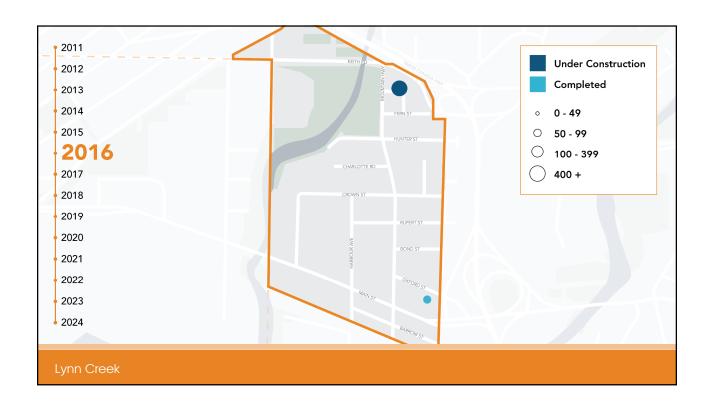


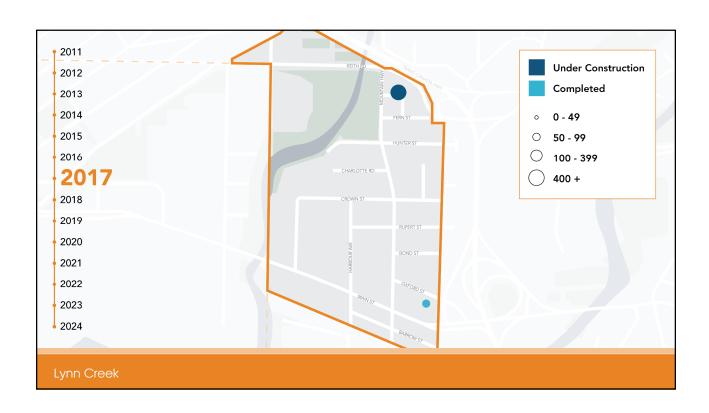


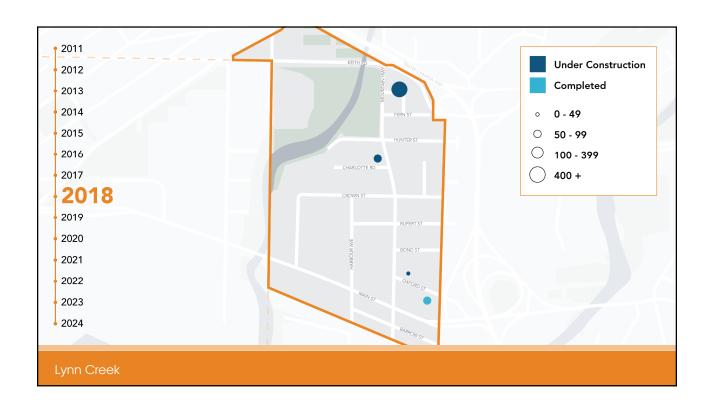


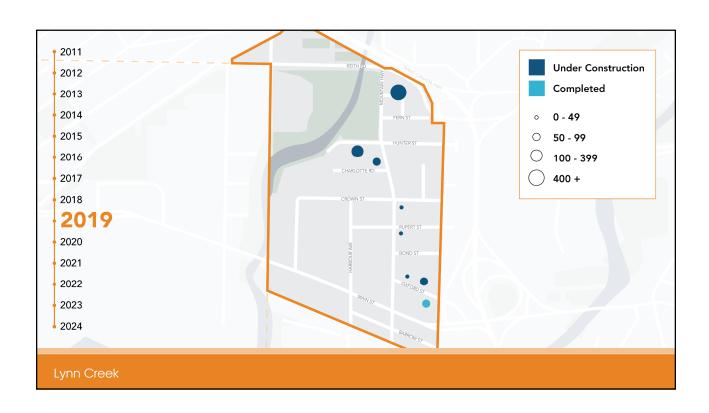








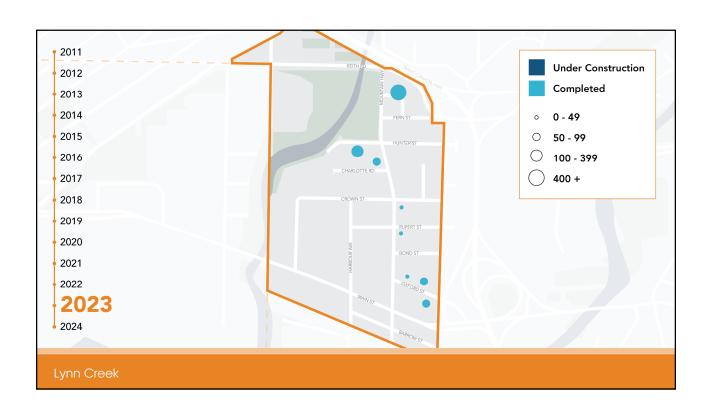




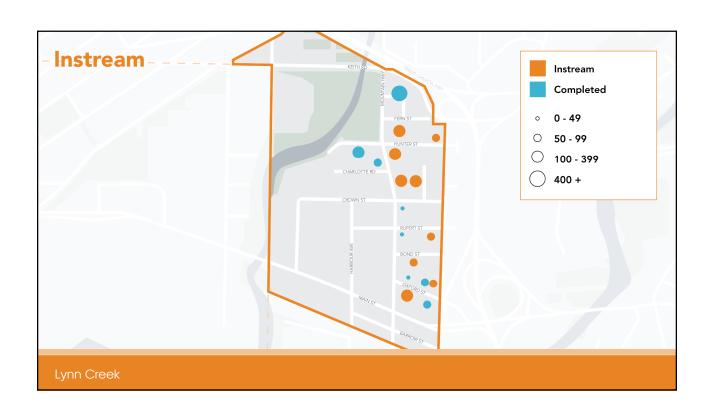




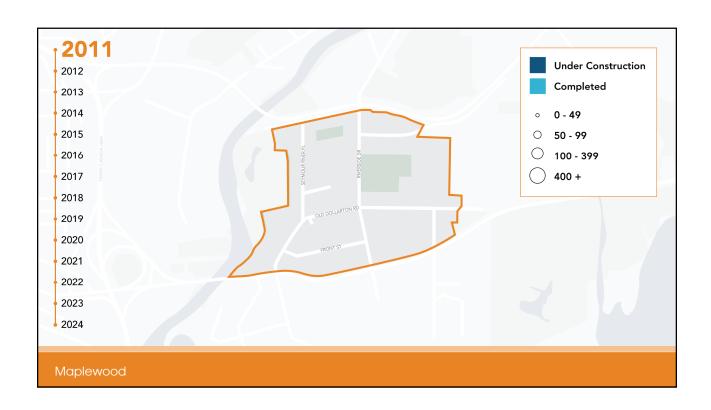


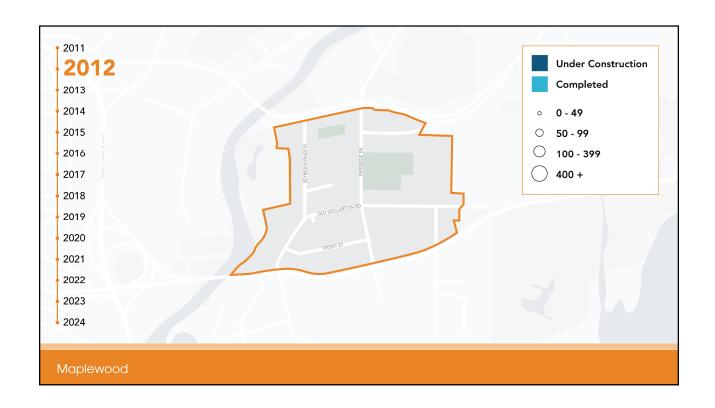


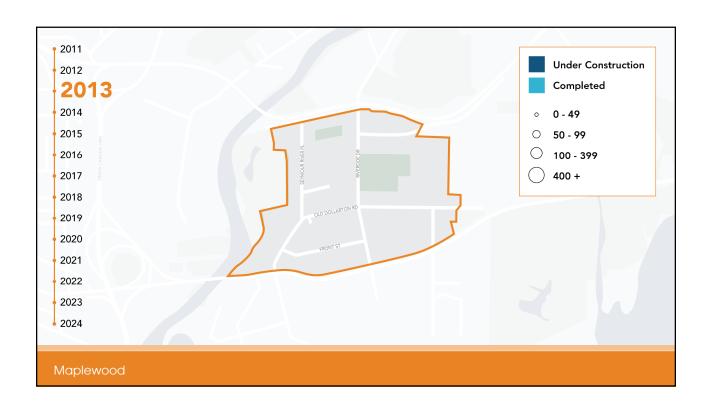


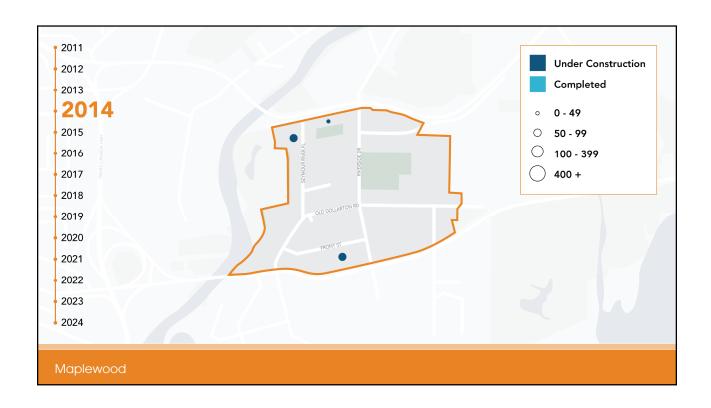


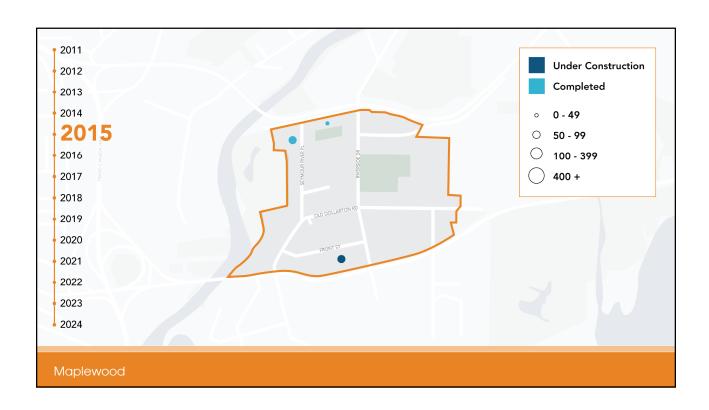
## Maplewood Pace of Development

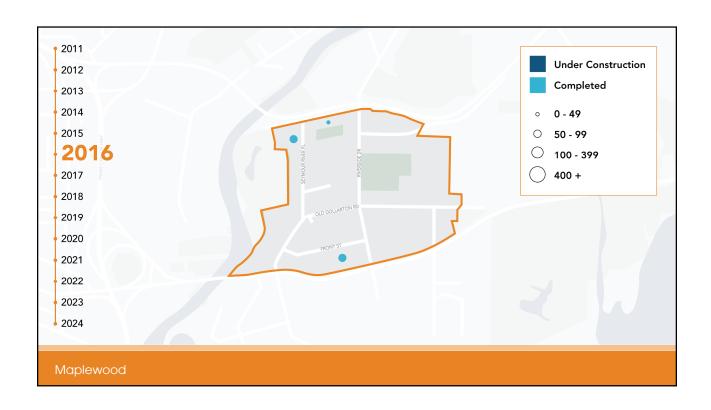


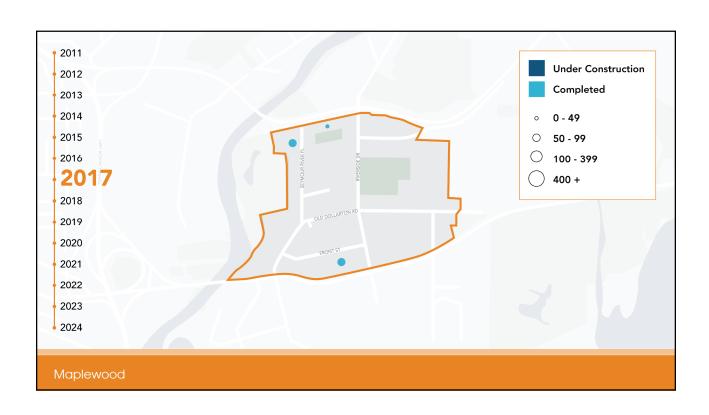


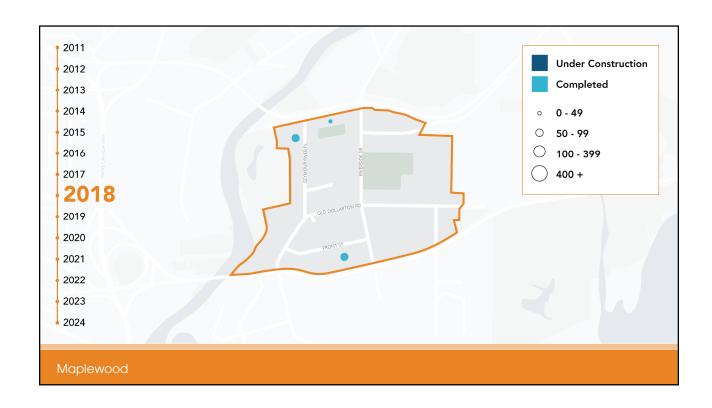


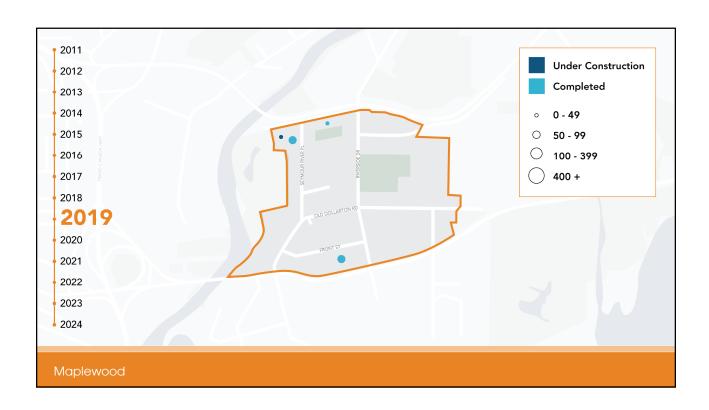


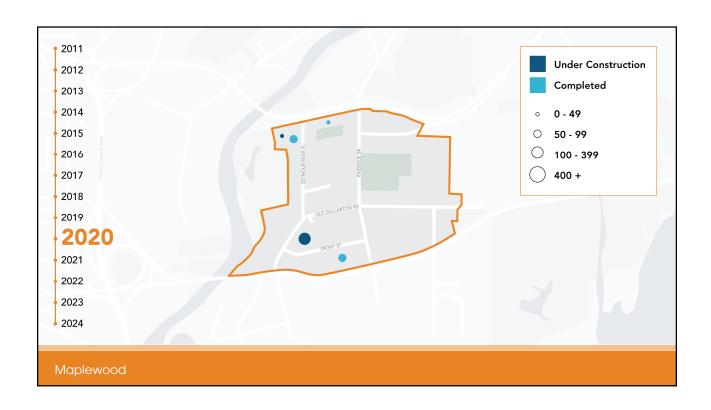


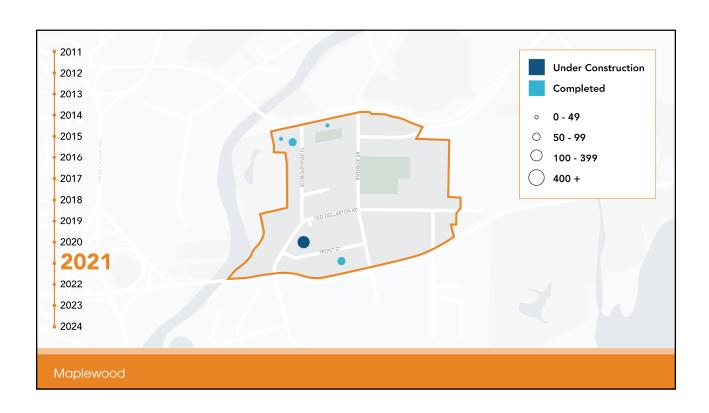


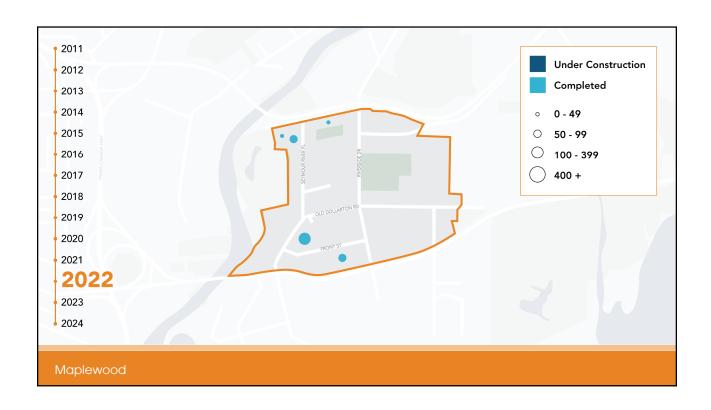


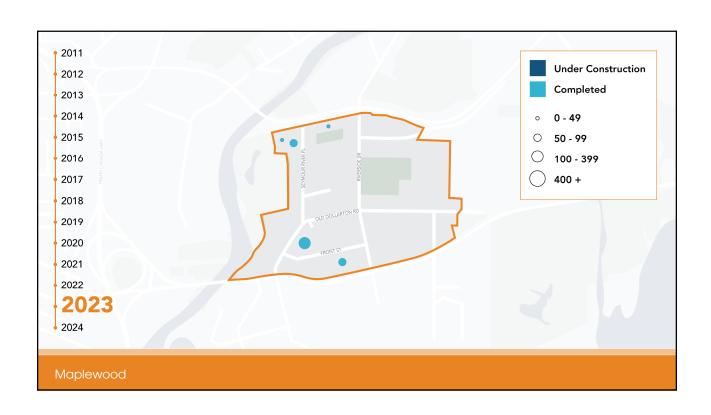


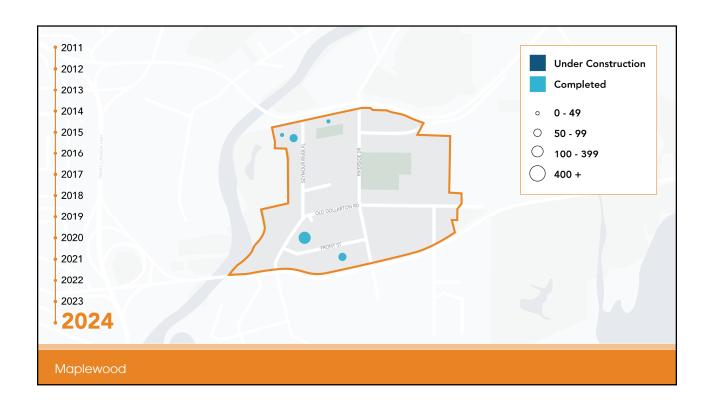


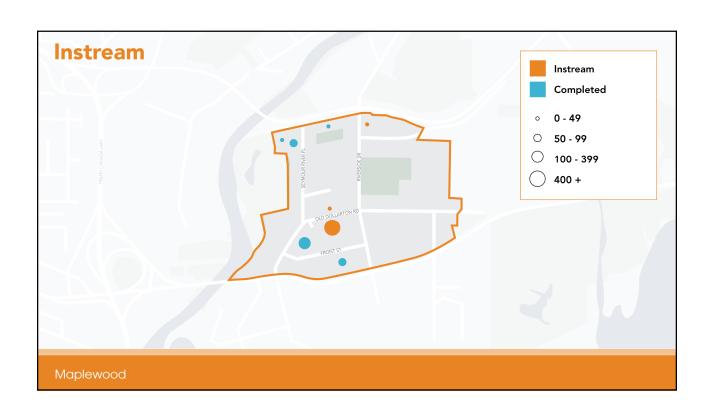




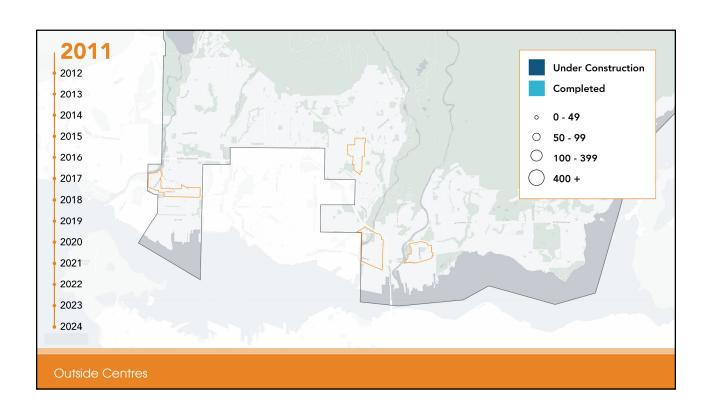


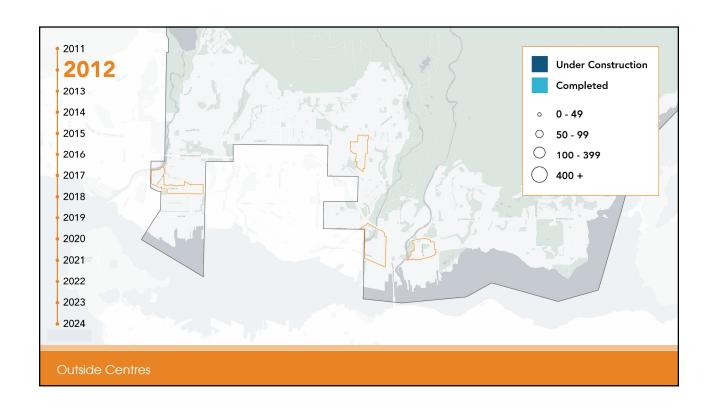


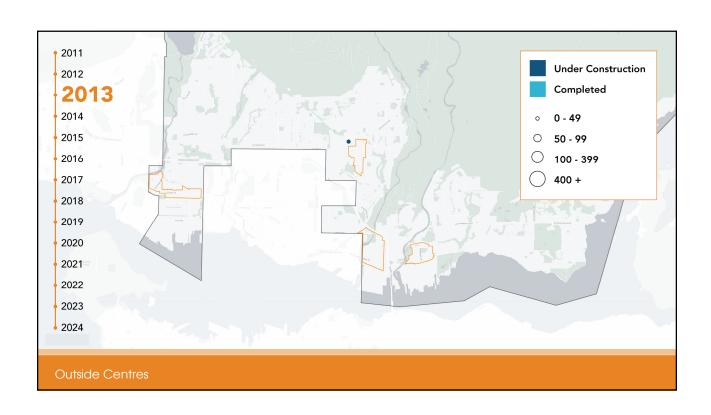


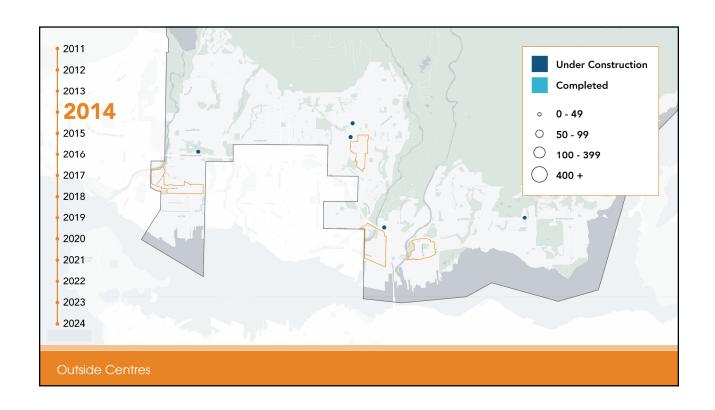


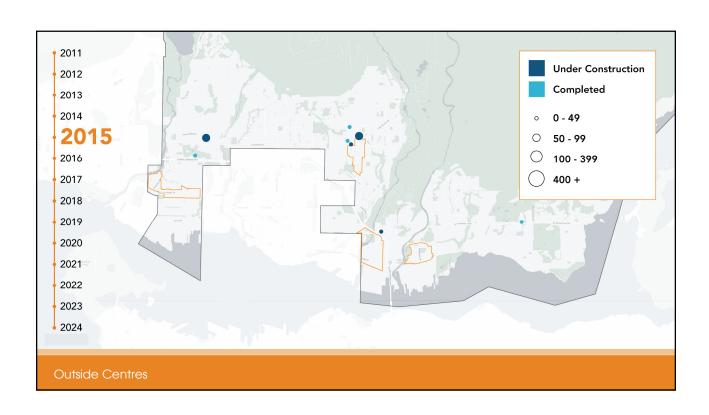
# Outside Centres Pace of Development

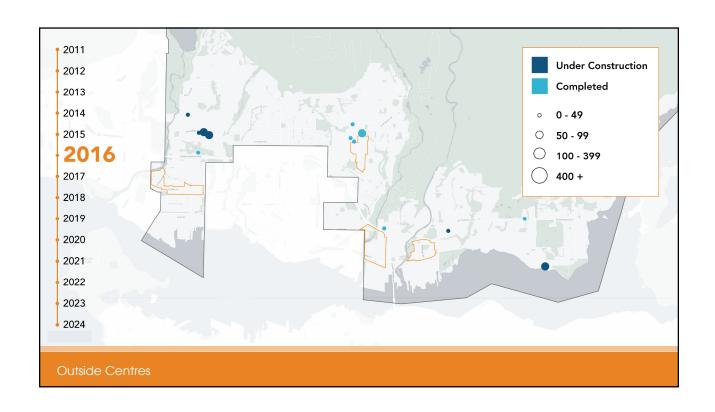


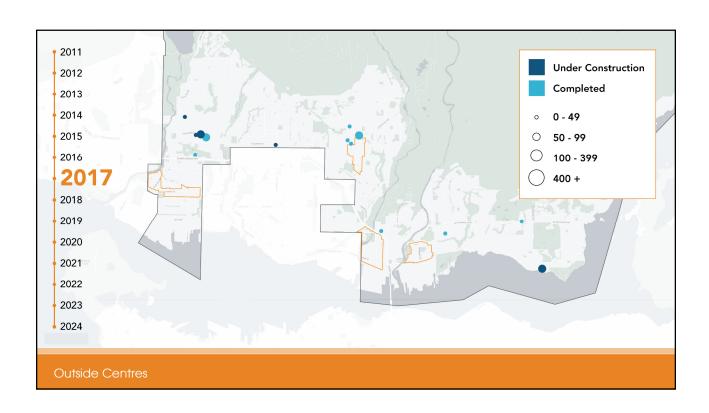


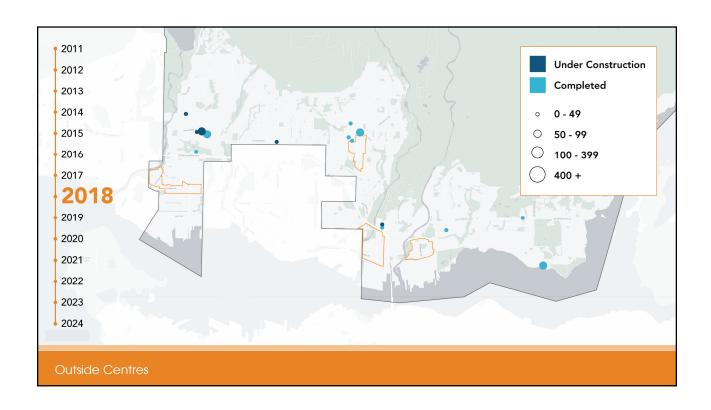


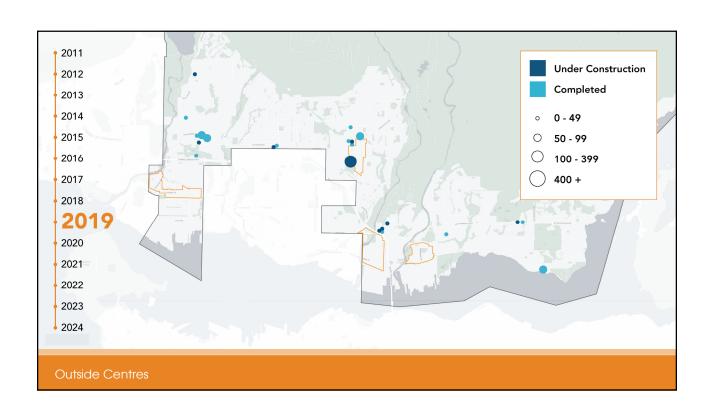


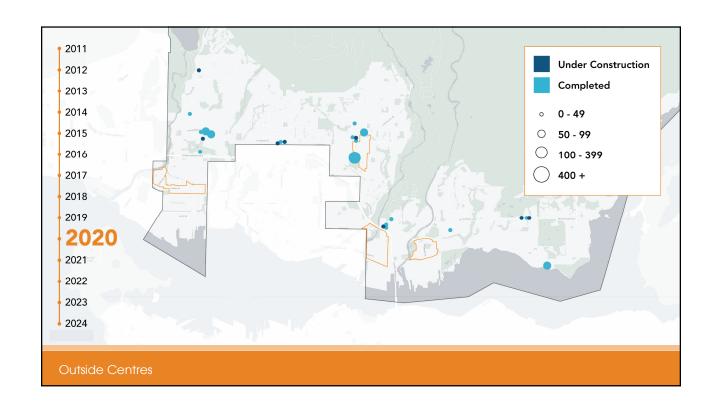


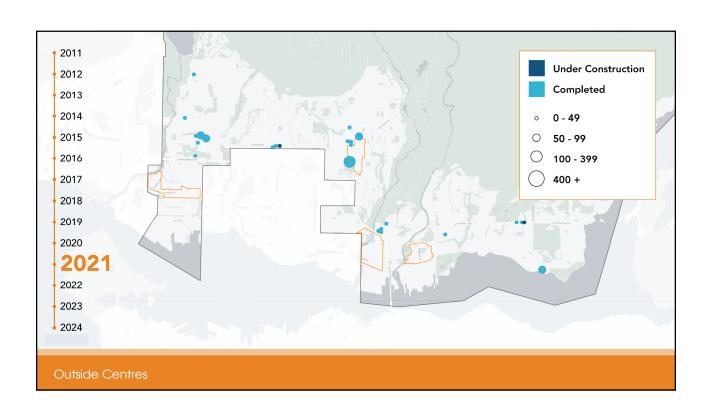


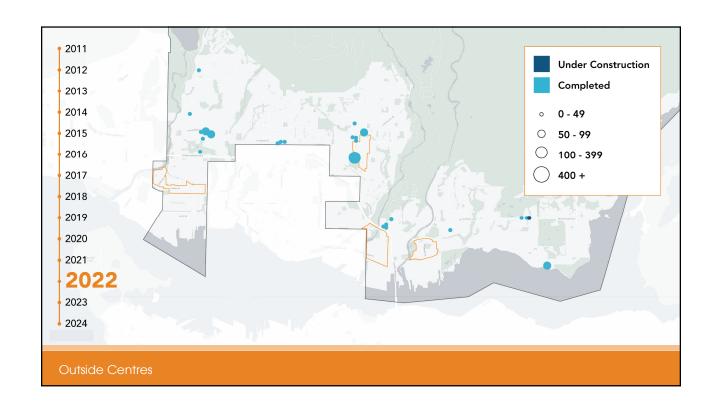


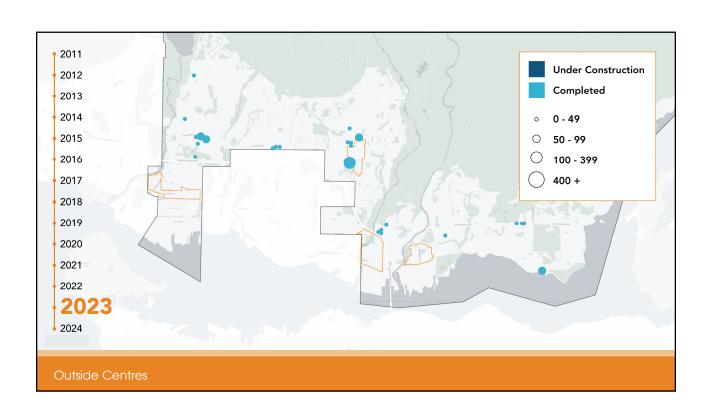


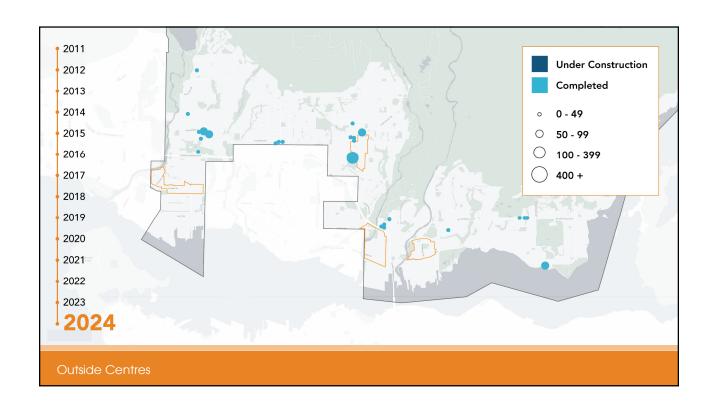


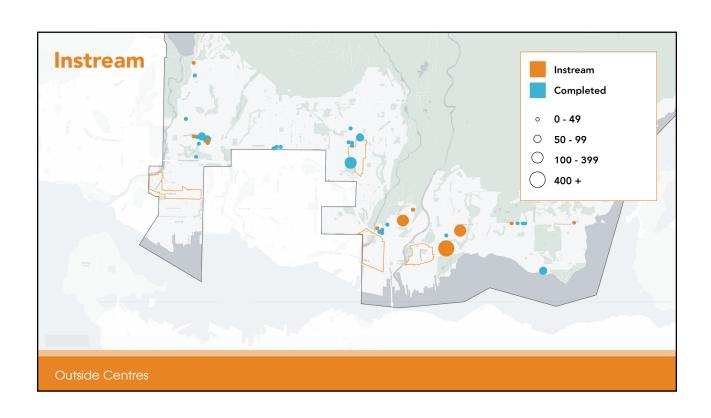


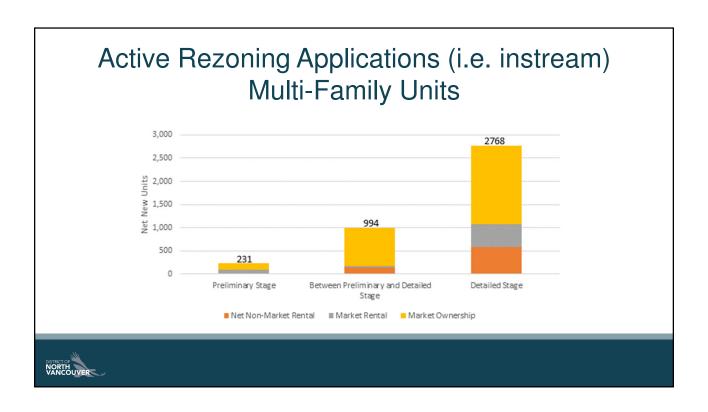












### Options for Active Rezoning Applications (i.e. instream):

- -Consider proposals on their individual merits
- -Focus on key town and village centres
- Focus on rental housing, affordable housing and care facilities
- Focus on proposals with significant transportation improvements



#### Attachment B: Chronology of Pace of Development Reports and Presentations

This attachment provides a chronological overview of the pace of development reports and presentations to Council beginning with Council's endorsement of the Regional Growth Strategy and adoption of the Official Community Plan in 2011. The reports and presentations summarized below are found on the District's web page: District Council minutes, agendas and notices: <a href="https://app.dnv.org/councilsearchnew/">https://app.dnv.org/councilsearchnew/</a>

#### Regional Growth Strategy - March 2011

On March 21, 2011, Council endorsed the new Regional Growth Strategy entitled Metro Vancouver 2040 – Shaping Our Future, which included collective goals: Compact Growth Management; Sustainable Economy; Natural Environment & Climate Change; Complete Communities; and Transportation Choice. As a member municipality, the District's OCP and approach to growth management aligns with the Metro Region which is expected to accommodate an additional 1 million people and 500,000 jobs by 2040. Please see item number 8.2 (page 43) in the March 21, 2011 agenda: <a href="https://app.dnv.org/OpenDocument/Default.aspx?docNum=1592661">https://app.dnv.org/OpenDocument/Default.aspx?docNum=1592661</a>

#### Official Community Plan (OCP) Adoption – June 2011

After two years of intense, creative dialogue and input, the District Council adopted an Official Community Plan (OCP) on June 20, 2011. The OCP included an estimated of 10,000 net new residential units (500 units/year) and 20,000 new residents (1,000 people/yr.) between 2011 and 2030. The OCP also called for growth to be focused (75% to 90%) in the four key centres (Lions Gate, Lynn Valley, Lynn Creek and Maplewood), and housing diversity to increase with new multi-family development in town/village centres and modest infill in existing single-family neighbourhoods. The OCP includes direction for plan monitoring (Sec. 12.2) and plan implementation (Sec. 12.3). Please see item number 8.2 (page 5) in the June 20, 2011 agenda: <a href="https://app.dnv.org/OpenDocument/Default.aspx?docNum=1649188">https://app.dnv.org/OpenDocument/Default.aspx?docNum=1649188</a>

#### OCP Implementation Committee – April 2012 to February 2014

In April 2012, an OCP Implementation Committee was created to encourage meaningful community engagement in the implementation of the OCP and to provide comment to staff on the direction of the implementation plans to ensure they support the community's vision as expressed in the OCP. The committee's focus included:

- Community engagement
- Reviewing implementation plans, and other related plans, to ensure consistency with the OCP, and
- Comment on a monitoring program to measure progress on OCP targets

#### OCP Implementation Committee – February 2014 to December 2015

In February of 2014, an updated Implementation Committee Terms of Reference was approved, while the mandate remained relatively consistent:

- Community engagement in OCP implementation
- Consistency of implementation planning with the OCP vision
- Monitoring program to measure progress on OCP targets

A Monitoring Working Group subcommittee was formed in July 2014, with a mandate to:

- Establish OCP performance indicators
- Track progress towards OCP goals and objectives

To view the Terms of Reference please click:

https://www.dnv.org/sites/default/files/edocs/OCP-Implementation-terms-reference.pdf

The OCP Implementation Committee and staff presented the results of their work to Council during two workshops (October 26, 2015, and December 14, 2015), and the Committee's mandate ended on December 31, 2015. Key finding of the Committee included:

- Relatively short time lapse since adoption
- Slow incremental change heading in the right direction towards OCP implementation
- Value in establishing targets/trends, indicators and baseline measures
- Background planning and ongoing implementation work as important foundation
- Stay the course, results become more meaningful over time
- Useful tool for the community and Council

On March 7, 2016, District staff provided Council with a comprehensive report in response to the committee's work. Please see item number 9.2 (page 37) in the March 7, 2016 agenda: https://app.dnv.org/OpenDocument/Default.aspx?docNum=2827978

#### Pace of Development Update - January 2015

While the OCP Implementation Committee's work was ongoing, Staff provided Council with a pace of development update on January 20, 2015. At that time, staff predicted that 2,752 new units would be built in the District by the end of 2019, and a total of 4,674 new units would be built by the end of 2024. Furthermore, the witnessed pace of approximately 370 new residential units built per year was less than the OCP estimate of 500 net new residential units per year between 2011 – 2030. The age of single-family homes was also highlighted as a potential cause of future increases in the rate of single-family house renewal. Key observations:

- Approved development not outpacing the OCP estimates
- Building for local needs and occupants
- On track for a balanced market
- Regionally, the District was not taking a large share of growth
- Plan directions remained valid:
  - Network of centres
  - Minimize change to single-family neighbourhoods
  - Producing needed housing to support a vibrant economy
  - Manage OCP and construction impacts
  - o Focus on relieving HWY 1

To view the presentation click:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=2607542

#### Pace of Development (Town Centre) Update - February 2016

On February 1, 2016, staff provided Council with an overview of progress achieved towards Council's vision, principles and goals for the growth centres including an update on the number of permit approvals and an overview of in-stream applications. The analysis

indicated that the pace of development continued to lag behind the anticipated demand from the OCP (500 net new residential units per year); however the forecast also indicated that pace would quicken over the subsequent years. Staff estimated that approximately 3,000 units could be constructed between 2011 and 2019, and approximately 6,000 total units constructed by 2022, if Council approved all of the applications under review at that time. To view presentation click:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=2807594

#### Pace of Development (Town Centre) Update - July 2016

On July 18, 2016, staff provided Council with an update on year-to-date permit and land use application activity. To view presentation click:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=2942437

#### Metro Vancouver Regional Affordable Housing Strategy - November 2016

After considering a draft strategy in December 2015, Council endorsed the Metro Vancouver Regional Affordable Housing Strategy on November 21, 2016, which includes the following goals:

- Expand the supply and diversity of housing to meet a variety of needs
- Preserve and expand the rental housing supply
- Meet housing demand estimates for low and moderate income earners
- Increase the rental housing supply along the Frequent Transit Network
- End homelessness in the region

Please see item number 9.5 (page 137) from the November 21, 2016 agenda: <a href="https://app.dnv.org/OpenDocument/Default.aspx?docNum=3046579">https://app.dnv.org/OpenDocument/Default.aspx?docNum=3046579</a>

#### District of North Vancouver Rental and Affordable Housing Strategy – November 2016

After a series of workshops in 2015 and 2016, Council approved the Rental and Affordable Housing Strategy on November 28, 2018. The strategy is focused on the needs of low and moderate income households including families, young adults and students, seniors, persons with disabilities, and vulnerable persons at risk of homelessness. The strategy includes an estimated 10-yr demand of 600 to 1,000 affordable rental units (2016 – 2026) and the following goals:

- Expand the supply and diversity of housing
- Expand the supply of new rental and affordable housing
- Encourage the maintenance and retention of existing affordable rental
- Enable the replacement of existing rental housing with conditions
- Minimize impacts to tenants
- · Partner with other agencies to help deliver affordable housing.

Please see item number 9.6 (page 235) from the November 28, 2016 agenda: https://app.dnv.org/OpenDocument/Default.aspx?docNum=3056928

#### Review of the Official Community Plan Implementation – November 2016

On November 29, 2016, Council directed staff to complete a high-level review of the OCP implementation in consideration of emerging issues and their impact on progress towards the OCP goals, and report back in early 2017.

Please see item number 3.1 (page 13) in the November 29, 2016 workshop agenda: <a href="https://app.dnv.org/OpenDocument/Default.aspx?docNum=3056009">https://app.dnv.org/OpenDocument/Default.aspx?docNum=3056009</a>

Progress Towards 2030: OCP Implementation Review - April and May 2017

In response to Council's direction in November 2016, staff presented a report on April 18<sup>th</sup>, 24<sup>th</sup>, and May 2<sup>nd</sup> 2017 which included the results of the high-level review on progress towards implementing the OCP from the years 2011 to 2016. The results of a New Multi-Family Residential Survey were also presented. Some key findings:

- A combined 92% of new multi-family survey respondents indicated their previous home location was the North Shore (54%) or in other parts of Metro Vancouver (38%)
- 46% of new multi-family survey respondents were in the "missing generation" (20 40 years of age)
- Consistent with the OCP target, about 76% of the net-new residential unit growth was focused in the four key centres
- 86% of the net-new residential unit growth was close to existing or future Frequent Transit Network.
- Regional and sub-regional growth outpaced the District's growth (1.8% for the DNV, 3.4% for the North Shore, and 6.5% for Metro Vancouver between 2011 and 2016)
- Since 2011 the District maintained or exceeded the target ratio of 3.6 Ha of community and neighbourhood park per 1,000 residents.
- Housing diversity and choice is increasing with the vast majority (98%) of net-new residential units being multi-family (e.g. apartments and townhouses)
- Single-family home renewal was likely to increase over time as the bulk (61%) of the existing supply was nearing 40 to 70 years old.

Please see presentation from April 18, 2017:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3184623

Please see item number 3.1 (page 7) from April 24, 2017:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3184947

Please see presentation from May 2, 2017:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3197900

#### OCP Implementation Monitoring Committee – May 2017 to October 2018

Council debated the need for a new committee on May 9<sup>th</sup>, 2017, and a Terms of Reference for this new committee was approved by Council on May 29, 2017, and amended on June 19, 2017. The purpose of the Committee was to encourage meaningful community engagement in the implementation of the OCP and to provide commentary and observations, as requested, on elements of OCP implementation, monitoring, and communications with the public. After their appointment on September 18, 2017, the committee developed a work plan and presented a series of reports to Council, with a final report on October 1, 2018. An executive summary of the Committee's final report is included with this report as Attachment C.

Please see presentation from May 9, 2017:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3203874

Please see Terms of Reference, item number 9.8 (page 331) from the May 29, 2017 agenda: https://app.dnv.org/OpenDocument/Default.aspx?docNum=3218400

Please see final report, item 9.1 (page 29) from the October 1, 2018 agenda: <a href="https://app.dnv.org/OpenDocument/Default.aspx?docNum=3732389">https://app.dnv.org/OpenDocument/Default.aspx?docNum=3732389</a>

#### Housing Continuum – January 2018

While the OCP Implementation Monitoring Committee's work was ongoing, Staff provided Council with an update on the Housing Continuum on January 23, 2018. The continuum provided a detailed breakdown of the anticipated market and non-market housing types to meet the future needs of District residents with four areas of focus:

- Housing diversity,
- Rental housing,
- Housing affordability, and
- Non-market housing and homelessness.

Please see continuum here:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3463495

#### Rental and Affordable Housing Strategy Update - April 2018

On April 17, 2018, staff provided Council with an update on the implementation of the District's Rental and Affordable Housing Strategy including progress towards the six goals of the strategy, and a description of the National Housing Strategy and Provincial: Homes for BC plan. Please see presentation here:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3549643

## <u>Information Report: Detailed Rezoning Applications Pending Council Consideration of First Reading – March and April 2018</u>

A list of in-stream rezoning applications was provided to Council in March of 2018. On April 9, 2018, Council requested a report on current and future development being considered for the year 2018.

Please see item number 9.2 (page 49) from the April 9, 2018 agenda: https://app.dnv.org/OpenDocument/Default.aspx?docNum=3535885

#### **Development Update (2011 – 2018) – June 2018**

In response to Council's request from April 9<sup>th</sup>, 2018, staff provided a detailed report on June 19, 2018, summarizing:

- Historical and anticipated net new housing units (both annual and cumulative estimates) for the whole community and each key centre.
- The gross number of units by housing type and number of bedrooms was also provided
- Updated Housing Continuum summarizing progress towards the estimated units described in the OCP (i.e. 10,000 net new units)
- Estimated construction values, and
- Estimated Community Amenity Contributions approved by Council from 2011 2018.
- The net new residential units built and occupied from 2011 to May 2018 was 1,530, while the total number of residential units that were presented to Council for the remainder of the 2014 2018 Council term totalled up to 6,540 units which could be built and occupied by 2030. Please note: Not all of these units were ultimately

considered by the former Council (e.g. Maplewood Innovation District was deferred to the new Council)

Please see item number 3.2 (page 19) from the June 19, 2018 agenda: https://app.dnv.org/OpenDocument/Default.aspx?docNum=3604911

#### Community Amenity and Housing Update – July 2018

On July 17, 2018, staff presented the current state of affairs related to Community Amenity Contributions and housing that had been approved since 2011, and those pending Council consideration in 2018.

Please see presentation here:

https://app.dnv.org/OpenDocument/Default.aspx?docNum=3642103

#### Multi-family Development Statistics - November 2018

Development statistics were updated on the District's web-page:

https://www.dnv.org/property-development/multi-family-development-statistics

#### Official Community Plan - Implementation Monitoring Committee

#### **Executive Summary**

## District of North Vancouver October 2018

The OCP was published in 2011. The Council requested that the OCP IMC committee begin September 2017.

- We affirm the OCP as a living document that accurately reflects the vision and plans of the District of North Vancouver.
- We encourage our fellow citizens to recognize that we are in a growing pains stage of growth.
- The dynamics of the real estate market have distorted the implementation of the OCP.
  High density condominium development proposals have mushroomed and the DNV has
  not been as diligent as it needs to be to achieve the goals of the OCP in providing a
  variety of diverse housing opportunities.
- OCP implementation has had issues in Transportation with respect to Infrastructure for pedestrians, bicyclists and transit.
- The DNV needs to create more affordability and the most efficient and long term ways to do that are

Follow the OCP by opening up zoning so that more housing diversity is possible.

Motivating and requiring developers to build non-market and purpose built rental in perpetuity.

Recognizing that innovative ways of thinking are required to respond to new problems

- Transportation solutions follow density but need to be planned at the same time.
- The OCP goals to create concentrated town and village centres (and along transit corridors) with diverse housing help us solve issues of climate change, traffic and create more opportunities for people to live and work on the North Shore. This connection to minimizing environmental impact cannot be overstated.
- We recommend that any future OCP review committee use the OCP IMC Reports dated February 2018 and October 2018 as a starting place.