

Special Report

Airport Leases and Community Benefits

November 2022



Report Summary

The AUS Airport has plans to expand over the next 20 years. City Council members asked our office to report on who currently leases AUS Airport land and how the airport and airlines support communities in the surrounding areas.

The City has 31 active lease agreements at the AUS Airport excluding the main passenger terminal. The City leases two of the properties for very low rates which may impact the Airport's goal to be self-sustaining. Two other agreements have provisions that could exempt tenants from the Airport's Minimum Standards.

We surveyed eight airports and found all airports provide a variety of benefits to their communities. Airline carriers at the AUS airport also provide benefits to the community. However, airlines appear to mainly support communities where they operate hubs. No airline carrier operates a hub at the AUS Airport.

Contents

Objective & Background	2
What We Learned	3
Appendix A:	10
Appendices B & C:	12
Scope & Methodology.....	13

Cover: Austin-Bergstrom International Airport, City of Austin

Objective

The objective of this special request was to provide the following information requested by the City Council:

1. Review leasing agreements and leasing activities information to determine and summarize the following:
 - i. Current and past 10 years of leased land, including the scope of use and length of lease terms.
 - ii. Do any leases contain exclusive rights and/or provisions that exempt tenants from compliance with the Airport Rules and Minimum Standards?
 - iii. Does the leased land hinder AUS's ability to be self-sustaining, a requirement of a federally obligated airport?
2. Identify and list airports that have an established community benefits agreement.
3. Evaluate how airports and airline carriers in other cities and in Austin engage and support communities surrounding the airport.

Background

The City of Austin owns the Austin Bergstrom International Airport (AUS). The City's Aviation Department is responsible for managing the Airport as well as the Airport expansions and property leasing activities. The City has secured funding to support the Airport Expansion and Development Program and is currently in the planning phase of the expansion.

The City of Austin leases land and facilities at the Airport to various entities including airlines, car rental agencies, cargo companies, concessionaires, the state, and providers for general aviation services. The Airport covers 4,242 acres. Based on information provided by Aviation Department management, the City leases approximately 13.7 million square feet (excluding passenger terminal leases) of Airport land and receives about \$574,000 a month in cumulative rent from the leased space.

What We Learned

Summary

The AUS Airport has plans to expand over the next 20 years. City Council asked our office to report on who currently leases AUS Airport land and how the airport and airlines support communities in the surrounding areas.

The City has 31 active leases agreements of land and facilities at the AUS Airport excluding the leases in the main passenger terminal area. The scope of use and length of lease terms vary among the leases. Of the agreements, two have provisions that exempt or could exempt the tenants from compliance with the Airport's Minimum Standards. We did not identify any agreement that contained exclusive rights or provisions that exempted the tenant(s) from complying with the Airport Rules and Regulations.

The City determines lease rates based on historical rates and has not done a market study to determine the base value of the airport assets. The study would help inform the Airport's determination of baseline ground rental rates. Aviation Department is in the planning stages of this study. The City executed two of the 31 leases for nominal rates. In 2015, the Federal Aviation Administration (FAA) staff requested that the AUS monitor in-kind costs for the two tenants and adjust rent as needed.

In our survey of eight airports including AUS, only two airports had established community benefits agreements. All eight airports provide a variety of benefits to their nearby communities, as well as impact mitigation programs. The benefits and mitigation efforts are generally similar but vary in extent between airports.

We also surveyed the top seven airline carriers at AUS. Based on the survey results, the airline carriers provide services and assistance to the communities either directly or through partnerships with national or local non-profit organizations. However, they appear to mainly support communities around airports where they operate hubs. No airline operates a hub at the AUS Airport.

Request 1 Review AUS Airport leasing agreements and leasing activities information to determine and summarize the following information

Current and past 10 years of leased land at the AUS Airport

Based on information provided by the Aviation Department, there are 40 lease agreements active during the years 2012 and 2022.¹ During the period under review the City also issued three month-to-month temporary use licenses agreements to three entities that engage in cargo services at the Airport. As of August 2022, thirty-one (78%) of the 40 lease agreements and all three license agreements were still active. The original terms of these leases range from one month (month to month) to 99 years.

See Appendix 1 for a detailed list of the lease and temporary cargo agreements that were active in the last 10 years, including the scope of

¹ Excluding leases inside the passenger terminal

use and length of lease terms.

Do any leases contain exclusive rights and/or provisions that exempt tenants from compliance with ABIA's Airport Rules and Minimum Standards?

AUS leases are governed by both the Airport Rules and their Minimum Standards. Both items are sets of rules for the use of the airport. While the Airport Rules are mainly about organization and ensuring a positive customer experience, the Minimum Standards relate more to construction, maintenance, and operation of facilities on airport land.

Based on our review of the 31 active lease agreements, two agreements appear to have provisions that exempt or could exempt the tenants from compliance with the Airport's Minimum Standards.

- In a private-hanger facility lease, the tenant was granted a waiver related to having an on-premises fuel facility. According to the Minimum Standards, owners of non-commercial hangers are not allowed to store fuel on the premises. The City granted a waiver from this prohibition by allowing the tenant to install, keep, and maintain a single, 12,000 gallon above-ground fuel tank in which to store aviation fuel. The Minimum Standards do allow owners of private hangers to store fuel on the premises if they only use the fuel for their own aircrafts. We did not verify if the tenant met this requirement.
- In one Fixed Base Operation (FBO) lease agreement, there is a clause that states that in the event of a conflict between the Minimum Standards and the lease, the lease shall control.

The Minimum Standards allow the Director to waive one or more of the Minimum Standards for good cause shown upon request of the owner, provided that such a waiver would not adversely affect public health and safety, airport security, airport finances or operations, or violate other applicable laws and regulations.

It appears that all the 31 agreements do not contain specific exclusive rights and/or provisions that exempt tenants from compliance with the Airport Rules.

Does AUS Airport leased land hinder the Airport's ability to be self-sustaining?

The Federal Aviation Administration (FAA) policy requires airport sponsors to ensure their airports are as self-sustaining as possible. The Guidebook for Developing and Leasing Airport Property study (Guidebook) notes "it should always be the goal of the airport sponsor, in line with FAA guidance to maximize revenue for the airport."²

The City establishes lease rates based on historical rates

² This study was sponsored by the Federal Aviation Administration.

The Guidebook notes that airport lease rates are usually determined by fair market value. The airport may vary its lease rates depending on a number of other factors including size, function, location, level of improvements to the land and facilities, and additional revenue provided by the tenant through other sources.

The lease rates charged by the City varied. Many of the AUS leases were executed more than 10 years ago. Current staff indicated that they are not aware of how the Aviation Department management at the time established the rent charges. They noted that the Airport currently establishes land lease rates based on the historical rates. Because AUS has not done a ground rental market study, we were unable to determine if the current lease rates charged are in line with the land's fair market value rates.

This does not constitute non-compliance with FAA airport leasing requirements. However, if the City charges low rent, it may impact the Airport's goal to be self-sustaining.

The Guidebook recommends that an appraisal of airport property should be conducted to determine the base value of airport assets. Aviation Department management noted that the department, with the help of the City's Office of Real Estate, is planning to carry out a rent market study, which will inform the Airport's determination of baseline ground rental rates.

Two active leases are nominal leases

There are 2 leases that were executed for nominal lease rates.

- A 99-year hanger lease for 13 acres of Airport land was executed with the State of Texas in 1999. The lease ground rent is \$1 per year. AUS management reported to the Federal Aviation Administration (FAA) that there was an Operations and Management (O&M) payment as well as an additional \$141,901 in in-kind services provided by the tenant. However, in August 2015 the FAA stated that the O & M needs to be adjusted to \$0.25 from \$0.05 per square foot to be in compliance with the lease agreement and requested that AUS management monitor in-kind costs to ensure they do not fall below \$0.25 per square foot. We have not seen evidence of such monitoring.
- An 88-year lease of 57 acres of the Airport land was executed in 1998 with the Texas National Guard. The lease ground rent is \$1 per acre annually. AUS management reported to FAA that there was an O & M payment as well as an additional \$148,840 in in-kind services provided by the tenant. However, in August 2015 the FAA stated that the in-kind services provided "seem low" for this amount and requested that AUS monitor in-kind costs to ensure they do not fall \$0.28 per square foot. We have not seen evidence of such monitoring.

The majority of the Airport long-term leases have provisions for periodic rent escalation

FAA-recommended practices indicate that airports' long-term leases should provide for continued adjustment of rent to compensate for inflation. This helps the airport avoid losing income over many years in times of long inflation. The majority of the Airport's current leases have a rent escalation clause that allows for the rates to be periodically adjusted. The consumer price index is used as the basis for determining the increase. Lease rate escalation periods range between one to five years. The two leases noted above, however, do not have options for rent escalations.

All the leases include facilities' operations and maintenance costs that have to be paid by the leasing entities.

Requests 2 and 3

Survey a sample of other Airports to:

- Identify and list airports that have an established community benefits agreements.
- Evaluate how airports and airline carriers, in other cities and Austin, support communities surrounding the airport.

A community benefits agreement (CBA) is a voluntary but legally binding contract between a developer and community representatives. The agreement commits the developer to fulfill specific obligations for the benefit of the community in connection with a development project. In exchange, the community provides their support for the proposed projects.

We surveyed eight international airports including Austin-Bergstrom International Airport (AUS), Dallas Fort Worth International Airport (DFW), El Paso International Airport (ELP), John F Kennedy International Airport (JFK), Los Angeles International Airport (LAX), Philadelphia International Airport (PHL), Phoenix Sky Harbor International Airport (PHX), and San Jose International Airport (SJC).

Identify and list airports that have an established community benefits agreement

Only two airports, JFK and LAX, had active or recently active community benefits agreements (CBAs). The agreements were introduced as part of their airports' expansion/modernization efforts. Austin does not have a CBA.

The two agreements are similar in terms of content, and only vary in terms of funding and in the details of specific benefit programs. The agreements establish a number of community benefits as well as measures to reduce noise, pollution, and traffic impacts that the airports agreed to provide to the communities as part of the airports' expansion programs.

Community Benefits

Both CBAs have similar benefits, with both having:

- Provisions for economic development, job training, and hiring (including programs for targeted groups living in the projected impact area, including women and people of color, and local businesses).
- Partnerships with nearby local schools/school districts to fund aviation-related educational programs.

Impact mitigation measures

Both CBAs have similar provisions that the airports agreed to take to

minimize the impact arising from the airport expansion programs, with both featuring:

- Noise mitigation efforts for surrounding communities.
- Funding for health, environmental, and air quality studies.
- Requirements, funding, and initiatives for green building practices.
- Shared provisions including electrification of airport gates and cargo areas, limits on idling construction equipment, incentives for alternative fuel use, restrictions on rock crushing, and the storage of hazardous materials near residential areas.

How do airports in other cities and Austin support communities surrounding the airport?

All eight airports provide a variety of benefits to their nearby communities, as well as impact mitigation programs. The benefits and mitigation efforts are generally similar but vary in extent between airports.

Community support programs

Six (75%) of the eight airports offer educational collaboration, small business collaboration/promotion, targeted hiring, and green building provisions as shown in Exhibit 1. Aviation Department staff stated that some of the AUS's identified community benefits from the Airport Capital Program will be realized as the major components are approaching the construction phase.

EXHIBIT 1: The community benefits by the airports are generally similar

International Airport	Educational collaboration	Targeted hiring	Small business promotion	Green Building
AUS	✓	✗	<i>Planned*</i>	✓
DFW	✓	✗	✓	
El Paso	✗	✗	✗	✗
JFK	✓	✓	✓	✓
LAX	✓	✓	✓	✓
Philadelphia	✓		✓	
Phoenix Sky Harbor	✓		✓	✓
San Jose	✗	✓	✓	

**Aviation Department staff said this will be implemented as major components of Airport expansion are approaching the construction phase.*

We were unable to determine areas highlighted in gray due to lack of information.

Source: OCA survey of other airports' community benefits programs, September 2022

We noted the following community benefits programs that were unique to particular airports.

EXHIBIT 2: The community benefits by the airports are unique

Airport	Programs
AUS	<ul style="list-style-type: none"> ▪ <i>Food Rescue</i>: Community food partnership ▪ <i>Honor Flight Program</i>: Through this program the City transports veterans to Washington to participate in memorials dedicated to honor their service.
JFK	<ul style="list-style-type: none"> ▪ New bus lines between nearby community and the airport ▪ <i>Business Incubator</i>: Through this program the airport provides professional assistance to small businesses in starting, running, and maintaining their businesses
LAX	<ul style="list-style-type: none"> ▪ <i>Hire LAX</i>: The program provides an 8-week apprenticeship training to underrepresented people with the goal of hiring the graduates from the program ▪ <i>ACE Academy</i>: A week-long program for middle and high school students to familiarize them with aviation-related careers and learn about the airport
Phoenix Sky Harbor	<ul style="list-style-type: none"> ▪ <i>Community Speaking Program</i>: The program includes over 100 speaking events a year at schools, in the community, and at the airport

Source: OCA survey of other airports' community benefits programs, September 2022

Impact mitigation efforts and programs

Mitigation impact initiatives are similar, with all airports having some sort of community consultation structure where they met with neighborhood associations and community stakeholders to inform the community about expansions and get their feedback on current and future airport projects. Most of the airports also have initiatives relating to noise mitigation, environmental protections, and additional programs for land use/ expansion.

EXHIBIT 3: The impact mitigation initiatives by the airports are generally similar*

Airport	Community	Noise control	Environmental protections	Nighttime departure restrictions	Land use programs
AUS	✓	✓	✓	✗	
DFW	✓	✓	✗	✗	✗
El Paso	✓	✗	✗	✗	✗
JFK		✓	✓	✓	✓
LAX	✓	✓	✓	✓	✓
Philadelphia	✓		✓		
Phoenix Sky Harbor	✓				✓
San Jose	✓	✓	✓		✓

*We were unable to determine areas highlighted in gray due to lack of information.

Source: OCA survey of other airports' community benefits programs, September 2022

How do airline carriers in other cities and Austin support communities surrounding the airport?

We surveyed the top seven airline carriers at AUS to determine the types of support provided to communities surrounding the airports they serve.

Based on the survey results, airline carriers provide services and assistance to the communities either directly or through partnerships with non-profit organizations. The airlines appear to mainly support communities around airports where they operate hubs.

Services provided by airlines directly to communities

All surveyed airline carriers offer scholarships to students who are involved in community service, aspire to pursue a career in aviation, and need financial assistance. Most airline carriers offer scholarship opportunities to students regardless of location or association with the airline, but some airlines, such as American Airlines, require students to be a dependent of an airline carrier employee. Most airline carriers provide an interactive education program that connects airline employees with local elementary, middle, or high schools to provide mentorship through aviation-themed activities. See Appendix 2 for the type of programs that the airline carriers we surveyed provide to the communities.

Services provided by nonprofits supported by airline carriers

All airline carriers we surveyed support national and local nonprofits through corporate sponsorship in the form of monetary and in-kind donations. Some airline carriers host fundraising events for selected nonprofits annually or periodically.

Most of the nonprofits work with the communities in the areas including disaster response, global health and wellbeing, education, armed forces and veterans, environment sustainability; and diversity, equity, and inclusion. See Appendix 3 for the categories of nonprofits that the sampled airline carriers support.

Appendix A: Airport leases that were active in the last 10 years including the scope of use and length of lease terms

Ground Lease Tenant	Lease purpose	Leased square feet	Monthly lease amount (\$)	Lease Start Date	Original Term (years)	Time Left on Current Term
ABIA Retail	Design, develop, construct, operate and manage facilities on the Land	260,466	\$10,078	10/7/2013	40	39 yrs.
Aeroterm (Aero Austin, LP)	Develop and operate air freight and cargo facilities at the Airport	208,609	\$1,381	4/14/1995	20	16 yrs.
AUS Fuel - Airline Fuel Facility	Fuel facility storage and distribution.	786,509	\$24,251	10/1/2019	15	12 yrs.
Alamo-National Rental Car Service Area	Operation of car rental services.	217,800	\$9,801	2/4/1998	20	9 yrs.
Atlantic Aviation	Construction of facilities for fixed-based aircraft to operate as an FBO.	2,033,381	\$40,868	5/23/1999	40	17 yrs.
AFCO - Bellyfreight	Lease, design, construct, develop and operate facilities on the land.	209,880	\$6,821	5/23/1999	20	2 yrs.
AFCO - GSEM	Lease, design, construct, develop, and operate facilities on the land.	90,953	\$2,956	5/23/1999	20	2 yrs.
ASIG/Menzies Aviation	Develop, construct, operate, maintain, and promote Air Cargo Building.	2,500	\$2,342	5/17/2013	3	m-to-m
Bradford Airport Logistics	Premises and use of part of cargo handling area and parking area.	10,000	\$10,900	8/1/2013	6.9	m-to-m
Million Air (Austin FBO, Inc.)	Have and to hold premises, design and construct facilities (hangars for private aircraft, and taxiway), operate as a fixed base operator.	1,790,273	\$25,789	11/21/2019	30	27 yrs.
Avis Rental Car Service Area	Lease, construct, and operation of a facility on the land (facility hangar development agreement).	381,950	\$17,188	2/4/1998	20	9 yrs.
Booth ABIA	Develop, finance, construct, manage, maintain, and operate a corporate aircraft hangar building on the Premises	206,926	\$5,863	1/10/2006	30	14 yrs.
Budget - Rental Car Service Area	Construct, equip, maintain, use, and operate facilities as well as service, maintain, and store cars for a car rental service.	40,521	\$1,823	2/4/1998	20	9 yrs.
COA Transportation Department	Interdepartmental Agreement for lease of land for storage of materials.	118,048	\$2,459	4/1/2019	5	2 yrs.
CONRAC (Consolidated Rental Car Facility)	For design, construction, financing, occupation, operation, maintenance, and management of the Joint Use Facility for a consolidated rental car facility.	620,689	\$81,207	10/1/2015	30	24 yrs.
Enterprise Rental Car Service Area	To lease a portion of the Terminal Complex, construct new facilities, service/maintain/store/clean/fuel rental cars for a rental car service area.	65,340	\$2,940	1/10/2000	10	9 yrs.
Delta GSE	To lease the premises and use cargo apron area, cargo handling area, and parking spaces.	4,560	\$5,487	8/1/2019	5	2 yrs.
DHL Express (USA)	Development and operation of an air freight and cargo facility.	103,604	\$58,087	6/27/1997	10	3 months
Federal Express Corporation	Lease of cargo facility and area	226,108	\$109,097	6/24/1997	10	0
Ground Service International, Inc. (Dnata)	Lease of cargo area and parking area.	2,500	\$2,653	9/1/2015	3	m-to-m

Ground Lease Tenant	Lease purpose	Leased square feet	Monthly lease amount (\$)	Lease Start Date	Original Term (years)	Time Left on Current Term
Hertz Rental Car Service Area	Construct and operate facilities to service/maintain/store rental cars for a rental car service.	378,101	\$17,015	2/4/1998	20	9 yrs.
LoneStar Airport Holdings - South Terminal	Install, construct, operate, maintain, and repair Facility.	14,180	\$697	3/24/2016	30	24 yrs.
LoneStar Airport Holdings - South Terminal Parking	Lease and concession agreement to reactivate South Terminal, parking, and other facilities to serve air carriers that serve the Airport and passengers served by such carriers.	108,020	\$2,701	6/17/2019	27	24 yrs.
Scott Airport Parking - Phase 1	Lease, design, develop, construct, operate, and manage the facilities.	911,976	\$48,931	3/4/2014	30	22 yrs.
Signature Flight Support	Construction of facilities for a full service fixed base operation for general aviation aircraft	1,448,370	\$27,244	5/23/1999	40	17 yrs.
SkyChefs	Construct and operate a facility to provide in-flight catering for air carriers.	130,026	\$4,443	3/3/1998	20	2 yrs.
Southwest Airlines	Lease for building and cargo handling and parking space	15,756	\$9,762	6/1/2022	5	5 yrs.
STS Line Maintenance/Triumph NAAS	Lease use of cargo handling area and parking area.	4,300	\$4,741	7/27/2011	3	m-to-m
Texas National Guard	Operation and maintenance of military aircraft of the Texas National Guard, a joint forces military reserve center, and a joint forces maintenance facility. May also be used to support public safety.	2,613,600	\$1 per acre per year	6/15/2004	50	32 yrs.
United Parcel Service	Lease for cargo handling area and parking area.	91,166	\$32,682	6/29/1997	5	0
TxDOT Flight Services (Pooling Board)	Construct hangars, offices, and fueling facilities for "aviation related uses for State-owned and operated aircraft and attendant support activities for other governmental agencies.	566,420	\$1 per acre per year	9/1/1998	99	75 yrs.
Atlas Air	AUS Cargo Letter Agreements	310	\$365	3/15/2021	m-to-m	n/a
FEAM	AUS Cargo Letter Agreements	740	\$871	3/15/2021	m-to-m	n/a
Global Aviation/PrimeFlight	AUS Cargo Letter Agreements	2,500	\$2,471	3/15/2021	m-to-m	n/a
Elegant Limousine & Charter	Expired/terminated					
Encompass Air	Expired/terminated					
IAS Logistics/Pinnacle	Expired/terminated					
Lynxs Austin CargoPort, LLC	Expired/terminated					
Austin CargoPort Development, LLC	Expired/terminated					
True Lee Loudspeakers/Bass Boss	Expired/terminated					
Dollar-Thrifty RAC Service Center	Expired/terminated					
Via Airlines	Expired/terminated					
Advantage RAC Service Center	Expired/terminated					

Source: OCA review of the Airport leases information provided by Aviation Department staff, September 2022

Appendix B: Airline Carriers Provide a Variety of Community Benefits Directly to the Communities

We surveyed the top seven airline carriers that frequent the AUS to determine the types of support provided to communities surrounding the airports they serve. Below are the types of community benefits that we identified.

Airline Carrier	Donations Nonprofits	Miles Donation Program	Medical Transportation Grants	Student Scholarships	Interactive Education Programs	Employee Volunteer Program**	Program Locations
Southwest Airlines	✓	✓	✓	✓	✓	✓	Headquarters & Hub Cities
American Airlines	✓	✓		✓		✓	Preidentified Counties
Delta Air Lines	✓	✓		✓	✓	✓	Headquarters & Hub Cities
United Airlines	✓	✓		✓	✓	✓	Headquarters & Hub Cities
Alaska Airlines	✓	✓		✓	✓	✓	Preidentified States
Allegiant Air	✓		✓	✓	✓	✓	Headquarters
Spirit Airlines	✓			✓		✓	Primarily South Florida

*Airline carriers' customers can donate miles to charities of their choice or to the airlines predetermined charities

** Airline carriers' staff volunteer time to work in the community

We were unable to determine areas highlighted in gray due to lack of information

Source: OCA survey of airline carriers' community benefits programs, September 2022

Appendix C: Airline Carriers Provide a Variety of Benefits to Communities Through Nonprofits

This appendix shows the airline carriers and categories of nonprofits they support.

Airline Carrier	Disaster Response	Education	Global Health & Well Being	Armed Forces & Veterans	Sustainability	Diversity, Equity & Inclusion
Southwest Airlines	✓	✓	✓	✓	✓	✓
American Airlines	✓	✓	✓	✓		
Delta Air Lines	✓	✓	✓	✓	✓	
United Airlines	✓	✓	✓	✓	✓	✓
Alaska Airlines	✓	✓	✓	✓	✓	✓
Allegiant Air	✓	✓	✓			
Spirit Airlines		✓	✓	✓	✓	✓

*We were unable to determine areas highlighted in gray due to lack of information.

Source: OCA survey of airline carriers' community benefits programs, September 2022

Scope

The audit scope included leases of City-owned property outside the Airport passenger terminal area that were active within the last 10 years, and AUS management's outreach efforts to support communities surrounding the Airport. The scope excludes AUS subleases where the City does not have a direct lessor-lessee agreement with the sublease tenant.^{3,4}

³ The lessor refers to the owner of the property being leased and the lessee is the entity that leases the property.

⁴ These are cases where, for example, the entity leasing the AUS Airport land entered into a sublease agreement with another entity.

Methodology

To complete this special request, we performed the following steps:

- interviewed Aviation Department staff
- reviewed property lease agreements that were active at any time within the last 10 years
- reviewed policies governing Aviation Department's leasing activities
- analyzed AUS reports related to outreach and community benefits
- reviewed guidance from the FAA on leasing of airport land/properties
- surveyed a sample of other airports and compared AUS's efforts to support communities surrounding the Airport to the surveyed cities
- surveyed a sample of airline carriers that frequent AUS regarding the types of support provided to communities surrounding the airports they serve.

Project Type

Special request projects conducted by the Office of the City Auditor are considered non-audit projects under Government Auditing Standards and are conducted in accordance with the ethics and general standards (Chapters 1-3).

The Office of the City Auditor was created by the Austin City Charter as an independent office reporting to City Council to help establish accountability and improve City services. Special requests are designed to answer specific questions to assist Council in decision-making. We do not draw conclusions or make recommendations in these reports.

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