

## Appendix B: Future Conditions

Market conditions describe the supply and demand for different types of land uses. Market trends indicate the stability or variability of those conditions over time, including future trends assuming no major disruptions in market drivers, such as the economy and public policy. This section examines market conditions and future trends for residential, commercial, and industrial uses to forecast demand for the development of these uses in the Exit 26 planning area.

### RESIDENTIAL MARKET

#### County Population and Residential Development

With a population increase of 12,444 between 2021 and 2018 and a growth rate of 2.9 percent, York County ranked 7<sup>th</sup> of Pennsylvania’s 67 counties for population growth and 11<sup>th</sup> in growth rate during that time period.<sup>3</sup>

From a regional perspective, York County residential growth surpassed that of surrounding Pennsylvania and Maryland counties. Between 2006 and 2012 the

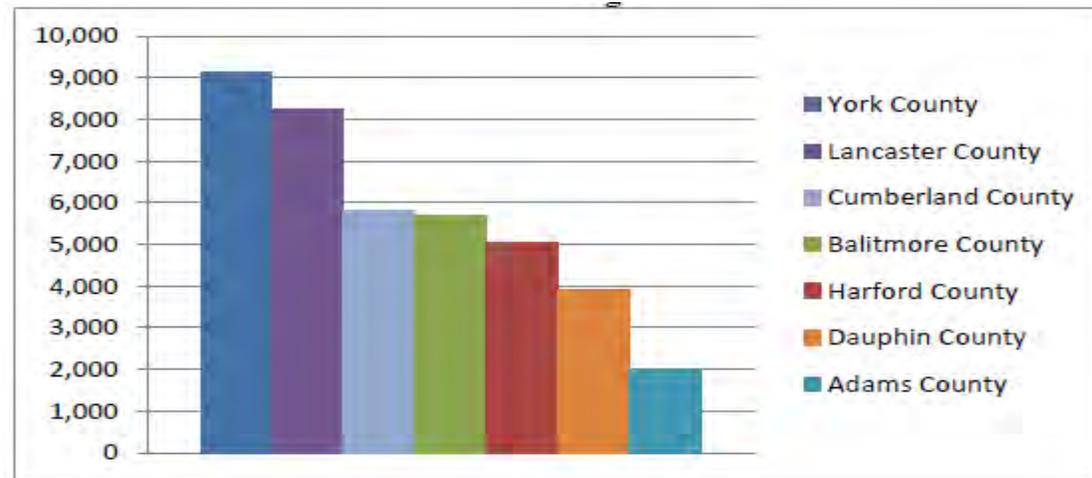
total number of residential building permits issued in York County was more than 9,000, the highest among York and surrounding counties. See Figure 37.

#### Municipal Residential Supply and Trends, 2010-2019

Residential building permit activity over the past 10 years was reviewed to

determine the extent to which planning-area municipalities have contributed to the county’s growth in new housing units and to develop a forecast for residential development. For the purposes of this analysis, all permits were assumed to represent completed construction.

Figure 37: Residential Building Permits York County and Surrounding Counties, 2006–2012



Source: YCPC, YCEA York County Economic Development Plan 2014 Update, p. 23.

<sup>3</sup> YCEA, Site Selector Profile, August 2020, p. 2.

**Figure 38: Residential Building Permits, 2010–2019**

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
<b>Conewago Township</b>	59	39	27	52	33	42	52	39	62	37	442
<b>East Manchester Township</b>	15	18	21	12	35	36	37	28	35	39	276
<b>Manchester Borough</b>	1	0	0	1	0	0	1	0	0	0	3
<b>Manchester Township</b>	35	32	32	31	29	26	26	24	24	21	280
<b>Exit 26 Municipalities</b>	110	89	80	96	97	104	116	91	121	97	1001
<b>Percent of County</b>	13%	14%	12%	11%	13%	14%	13%	10%	13%	9%	-
<b>York County</b>	815	640	657	901	737	763	877	907	934	1,056	8,287

Source: YCPC

**Figure 39: Residential Building Permits by Type, 2010–2019**

Municipality	Single Family	Mobile/ Modular	Duplex	Townhouse	Condo	Apartment	Total
<b>Conewago Township</b>	266	44	0	132	0	0	442
<b>East Manchester Township</b>	266	10	0	0	0	0	276
<b>Manchester Borough</b>	0	3	0	0	0	0	3
<b>Manchester Township</b>	279	0	0	1	0	0	280
<b>Exit 26 Planning Area</b>	811	57	0	133	0	0	1,001
<b>Percent of Total</b>	81%	6%	0%	13%	0%	0%	

Source: YCPC, Gannett Fleming, Inc.

Planning-area municipalities issued a total of 1,001 residential building permits—12 percent of York County’s total—from 2010 to 2019 (see Figure 38). This represents a yearly average of 100 new home constructions across planning-area municipalities.

Conewago Township experienced the largest increase in new homes (442 units). East Manchester and Manchester townships each approved about 280 housing permits. Manchester Borough approved only three.

**Residential Supply by Type, 2010–2019**

The dwelling units constructed reflect uses (or housing unit type), lot sizes, and densities established by municipal zoning ordinances. As shown on Figure 39, of the 1,001 new homes built in the Exit 26 planning area since 2010, single-family

homes comprise 81 percent followed by townhomes at 13 percent, and mobile/modular homes at 6 percent. Numbers of new single-family homes were similar across all three townships. The vast majority of townhomes and mobile/modular homes were built in Conewago Township. No residential building permits were issued for apartments, duplexes, or condominiums within planning-area municipalities between 2010 and 2019.

### Residential (Housing) Demand Forecast, 2015-2040

York County’s Growth Management Plan (amended 2017) developed housing forecasts for years 2020, 2030, and 2040 as a forecast of housing demand. The forecast was based 2010 census data and on the assumptions that key factors will remain steady: average household size (2.58 persons per household), the percentage of total population living in group quarters (1.9 percent), and housing vacancy rate (5 percent).

The housing unit forecast identified demand for an increase the County’s housing unit supply of 36,832, or 20 percent, between 2015 and 2040. Refer to Figure 40. A comparison of 2015-2019 countywide residential building permit activity to YCPC’s 2015-2020 residential demand forecast shows that actual residential construction has absorbed about 80 percent of the five-year projected demand, lending confidence to YPCP’s housing demand forecast.

**Figure 40: Residential (Supply) Trend for 2020, 2030, and 2040 based on 2010–2019 Trend**

Year	2010	2010-2020		2020-2030		2030-2040		2020-2040
	Count	Increase in Units	Total Units	Increase in Units	Total Units	Increase in Units	Total Units	Total Increase
<b>Conewago Township</b>	2,992	487	3,479	463	3,943	483	3,992	991
<b>East Manchester Township</b>	2,721	303	3,024	573	3,598	844	3,694	1,444
<b>Manchester Borough</b>	1,229	3	1,232	-	1,232	-	1,232	0
<b>Manchester Township</b>	7,110	308	7,418	120	7,538	7	7,538	155
<b>Exit 26 Municipalities</b>	16,062	1,102	17,164	1,154	18,318	1,334	18,464	2,589
<b>Percent of County</b>	9%	13%	9%	10%	9%	9%	9%	7%
<b>York County</b>	178,671	8,287	186,958	11,908	198,866	15,199	214,065	35,394

### Municipal Residential (Housing) Demand Forecast, 2020-2040

The York County housing demand forecast indicates significant future demand countywide (Figure 41). The York County Growth Management Plan encourages the majority of future housing and other intensive uses to be located within the designated growth areas, which includes developable lands within each of the planning-area municipalities, however it does not indicate sub-county distribution of the demand.

Figure 43 shows that the county’s demand projection for 2015-2020 was reasonably accurate, assuming building permits in 2020, the final year of the projection, continued at a similar pace; 2020 building permit data was not available at the time of this report. This analysis provided assurance that the county’s demand projection could be used as the basis for further analysis.

Residential building permit data was analyzed to determine the percentage of the county’s residential development by planning-area municipality for each year, 2015 through 2019. Less than five percent of the county’s development was in each of the planning-area townships and less than one percent of the county’s development was in Manchester Borough.

Figure 41: York County Housing Unit Projections

Time Period	2015–2020	2021–2030	2031–2040	Total
<b>Additional Housing Units</b>	5,646	16,234	14,952	36,832

Source: YCPC, York County Growth Management Plan. 2017.

Figure 42: Housing Demand Projection vs. Residential Building Permits Trend

<b>Housing Unit Projection, 2015–2020</b>	5,646
<b>Countywide Residential Building Permits, 2015–2019 (2020 data was unavailable)</b>	4,537
<b>Difference (units)</b>	1,109
<b>Difference (percent)</b>	19.6%

Source: Gannett Fleming, Inc.

These distribution rates were then applied to housing demand forecasts for 2020-2030 and 2030-2040 to proportionally distribute the county’s projected housing demand to the planning-area municipalities (Figure 44).

This analysis indicates a housing demand forecast of nearly 4,000 additional housing units for the planning-area municipalities by 2040. The largest residential development increase is expected in Conewago Township (1,842) followed by Manchester Township (1,072) and East Manchester Township (1,040). A small housing demand forecast is indicated for Manchester Borough (12).

Specific locations for future residential uses are dependent upon the availability of residentially zoned land as well as water and sewer service availability and treatment capacity. Both conditions exist within the Exit 26 planning-area portion of each municipality.

### Residential Real Estate Perspective

The residential market in York County was moving faster in 2020 than any time in the county’s history. Based on input provided by the REALTORS® Association of York & Adams Counties, Inc. (RAYAC), the county was a seller’s market, meaning there is not enough inventory of homes to meet buyers’ demand. Homes were on the market for an average of only 7 days, and multiple offers were common. For

context, a balanced market in the county—meaning an equal amount of residential supply and demand with neither the buyer nor the seller having an advantage—is 60 days.

Housing inventory in 2020 was down 47 percent from 2019 and the number of new homes brought to the market each year has been significantly lower than the peak of 3,064 in 2005<sup>4</sup> (Figure 45).

Nationally, and characterized locally by RAYAC, the residential development or supply is influenced by four factors:

- **Land available** for new residential development;
- **Costs of regulatory compliance**, i.e., fulfilling the process and requirements of local and state development regulations, including stormwater management provisions;
- **Cost of lumber**, which is renewable but finite in the short term; and
- **Skilled labor supply**, which has been a challenge for the construction industry. York County builders have construction projects under contract but find it difficult to attract and keep skilled construction workers.

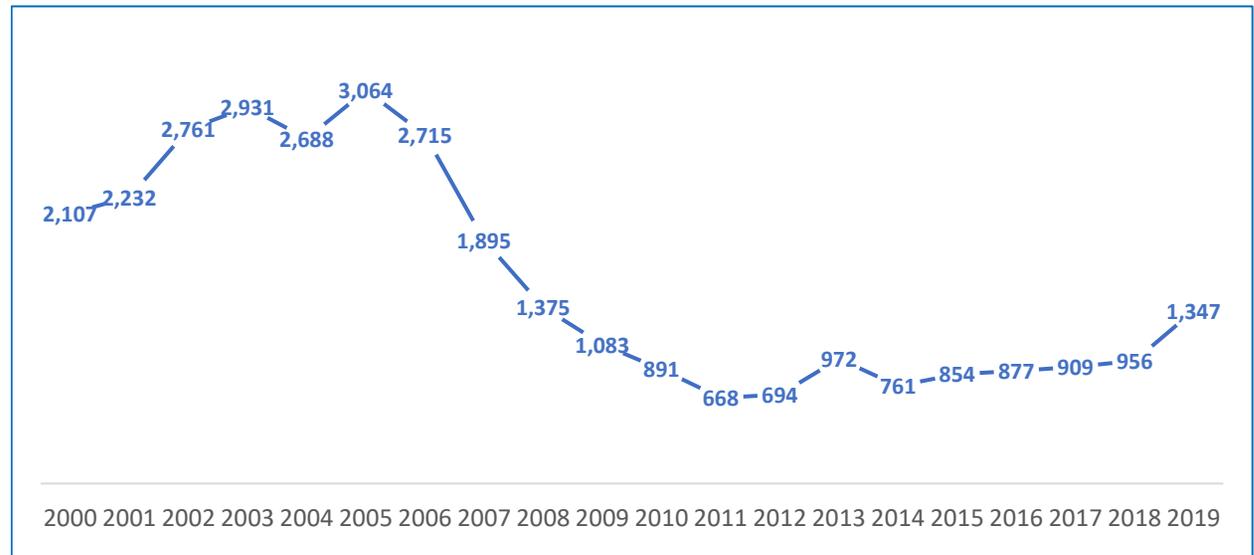
<sup>4</sup> RAYAC, October 2020

Figure 44: Projected 2020–2040 Housing Demand by Planning-Area Municipality

	2015-2019	2020-2030 Demand	2030-2040 Demand	Total Demand, 2020-2040	Percent Municipal Total
<b>York County GMP Housing Unit Projections (2017)</b>	4,537	16,234	14,952	40,549	-
<b>Municipal Distribution of County Housing Unit Increase</b>	<b>Actual</b>	<b>Projected</b>			
<b>Conewago Township</b>	5%	940	902	1,842	46%
<b>East Manchester Township</b>	4%	543	497	1,040	26%
<b>Manchester Borough</b>	0%	6	6	12	0%
<b>Manchester Township</b>	3%	558	514	1,072	27%
<b>Planning Area Total</b>	-	2,048	1,919	3,966	-
<b>% County Total</b>	12%	12%	13%	13%	-

Based on a distribution of countywide GMP housing demand per 2015-2019 municipal distribution rates.  
Source: YCPC, Gannett Fleming, Inc.

Figure 45: York County New Residential Housing Unit Permits, 2000 – 2019



According to RAYAC, factors that drive the pace of the residential demand include:

- **Interest rates** are at historic lows, resulting in greater demand to purchase and refinance homes.
- Now in their 30s, **Millennials are entering the housing market**, focused on first-time home buying.
- York County is **an affordable housing alternative** to the higher-priced Baltimore–Washington metropolitan area. Buyers know they can purchase more house for their dollar in York County compared to higher-priced housing markets.
- Pennsylvania is a tax-friendly **retirement location** for out-of-state Baby Boomers.
- In the short-term, as a result of **the COVID-19 pandemic**, some homeowners living in denser housing types, such as townhomes or condominiums, are seeking a single-family home where family members have more space, both inside and outside, for remote working and remote schooling, leading to residential pressures on larger lots in suburban or rural locations.

For the foreseeable future and until one or more of the above noted factors shifts, RAYAC believes that York County’s residential real estate market will remain highly active. An increase in new home construction would help meet the increased demand.

### Proposed Residential Development

The Exit 26 planning area provides a location to satisfy some of the York County’s housing demand. Planning-area municipalities identified three residential developments in or near the Exit 26 planning area that were already in the development proposal process.

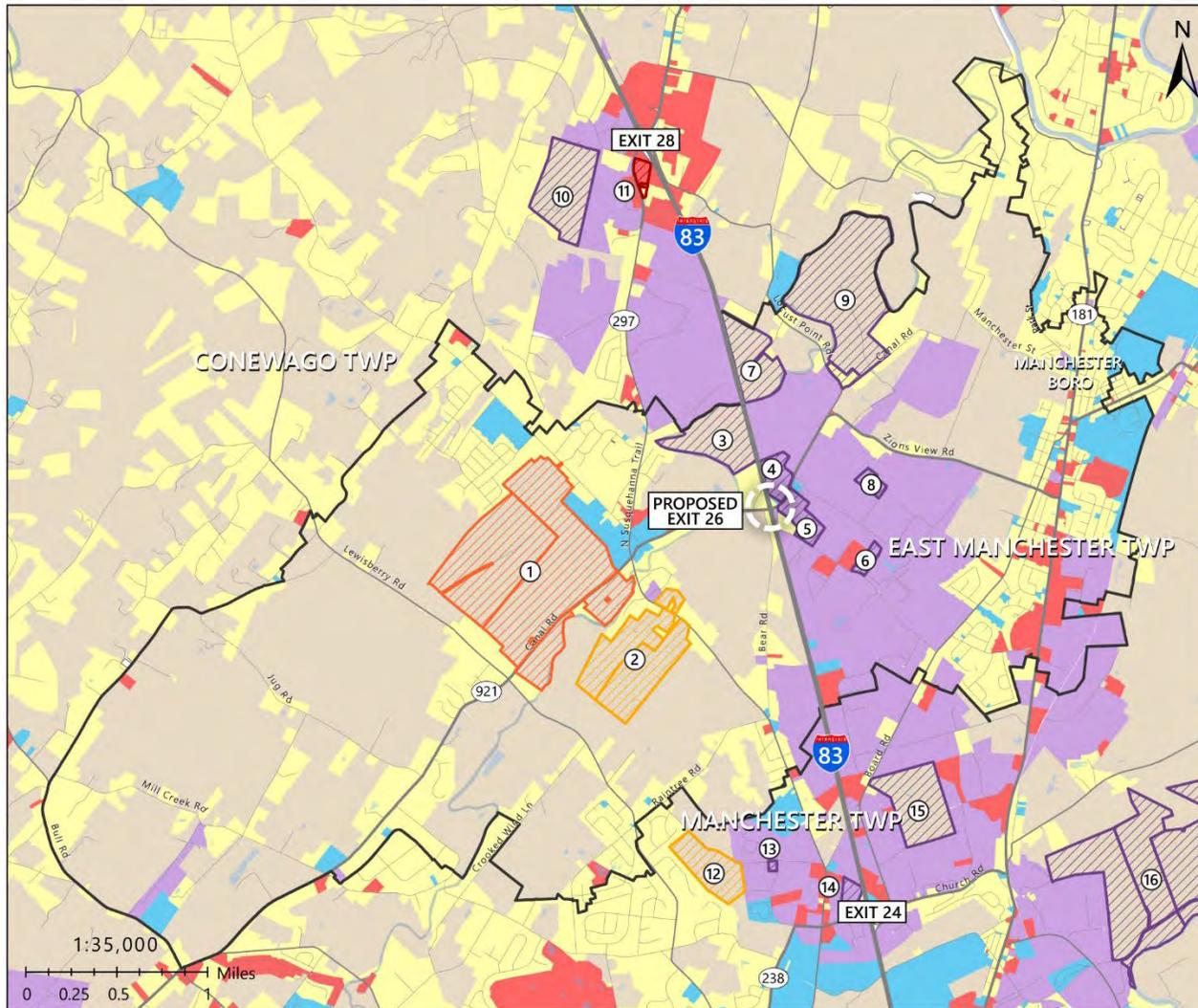
Freedom Square was proposed as a mixed residential and commercial development, generally located in Conewago Township’s village zoning district between Copenhaffer Road and Lewisberry Road north of Canal Road. The 460-acre site would be developed to include single-family homes, townhomes, and apartments, and senior homes and apartments, as well as commercial and office space, hotels, restaurants, green space, and a community center.

Wellbourne Reserve is a residential development proposal along the west side of North Susquehanna Trail. The 144-acre

site will include 121 single-family homes and 69 acres of open space.

A third, a single family residential development, is located south of the planning area along Farmbrook Road. See Figure 46 for locations.

Figure 46: Recent and Proposed Development, August 2020



**I-83 EXIT 26 LAND USE PLAN**

**Recent & Proposed Development, August 2020**

**LEGEND**

- Residential
- Commercial
- Mixed Use
- Industrial

ID	Development Description	Parcel Acres
1	Mixed-Use Development	443.7
2	Single Family Residential	144.4
3	Warehouse	68.9
4	Warehouse	19.3
5	Industrial (other)	18.2
6	Industrial (expansion)	6.4
7	Warehouse	64.5
8	Warehouse	11.4
9	Warehouse	205.8
10	Warehouse	85.6
11	Sheetz	6.2
12	Single Family Residential	49.3
13	Industrial (expansion)	3.8
14	FedEx Terminal	40.2
15	Warehouse	79
16	Warehouse	270.2

Sources: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNEX/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, York County Planning Commission, PennDOT Open Data. Prepared by Gannett Fleming, 2020.

## INDUSTRIAL, OFFICE, AND RETAIL MARKETS

### York County Industry Overview

York County has a diverse industry base and is a consistent economic performer in terms of employment business establishments. In the first quarter of 2020, the manufacturing sector ranked 4<sup>th</sup> in the state for employment (32,142 jobs) and 7<sup>th</sup> for establishments (584). With multiple sub-sectors in Advanced Materials and Diversified Manufacturing (AMDM), including Vehicle/Vehicle Equipment, Metals/Metal Fabrication, and Printing, as well as food production, manufacturing provides a higher percentage of all jobs in York County (18 percent) than in the South Central Workforce Development Area (WDA)(13 percent) or the state (10 percent). See Figure 47.

The Health Care and Social Assistance industry provides 15 percent of all jobs in York County compared to 16 percent at the WDA level and 19 percent at the state level.

The Retail industry rounds out the top three across all three geographic areas, providing 11 percent of all jobs in York County and 10 percent at the WDA and state levels.

Transportation and Warehousing, which includes distribution facilities, is a notable industry among many Pennsylvania counties traversed by Interstates; York County is no exception. Interstate 83

provides north–south access to the capital region and to the Port of Baltimore and I-76 (Pennsylvania Turnpike offers east–west access, making York County a prime location for warehouses and distribution facilities). In the first quarter of 2020, the industry ranked 10<sup>th</sup> statewide for establishments (323) and 11<sup>th</sup> for employment (10,867).

**Figure 47: Top Five Employing Industry Sectors for York County, South Central Workforce Development Area, and Pennsylvania (1<sup>st</sup> Quarter 2020)**

York County		South Central WDA		Pennsylvania	
Sector	Percent Total Employment	Sector	Percent Total Employment	Sector	Percent Total Employment
Manufacturing	18%	Health Care and Social Assistance	16%	Health Care and Social Assistance	19%
Health Care and Social Assistance	15%	Manufacturing	13%	Retail Trade	10%
Retail Trade	11%	Retail Trade	10%	Manufacturing	10%
Accommodation and Food Services	8%	Transportation and Warehousing	9%	Educational Services	9%
Educational Services	7%	Accommodation and Food Services	8%	Accommodation and Food Services	8%

Source: U.S. Department of Labor, Bureau of Labor Statistics, Quarterly Census of Employment and Wages, First Quarter 2020. Accessed via PA Center for Workforce Information & Analysis (CWIA).

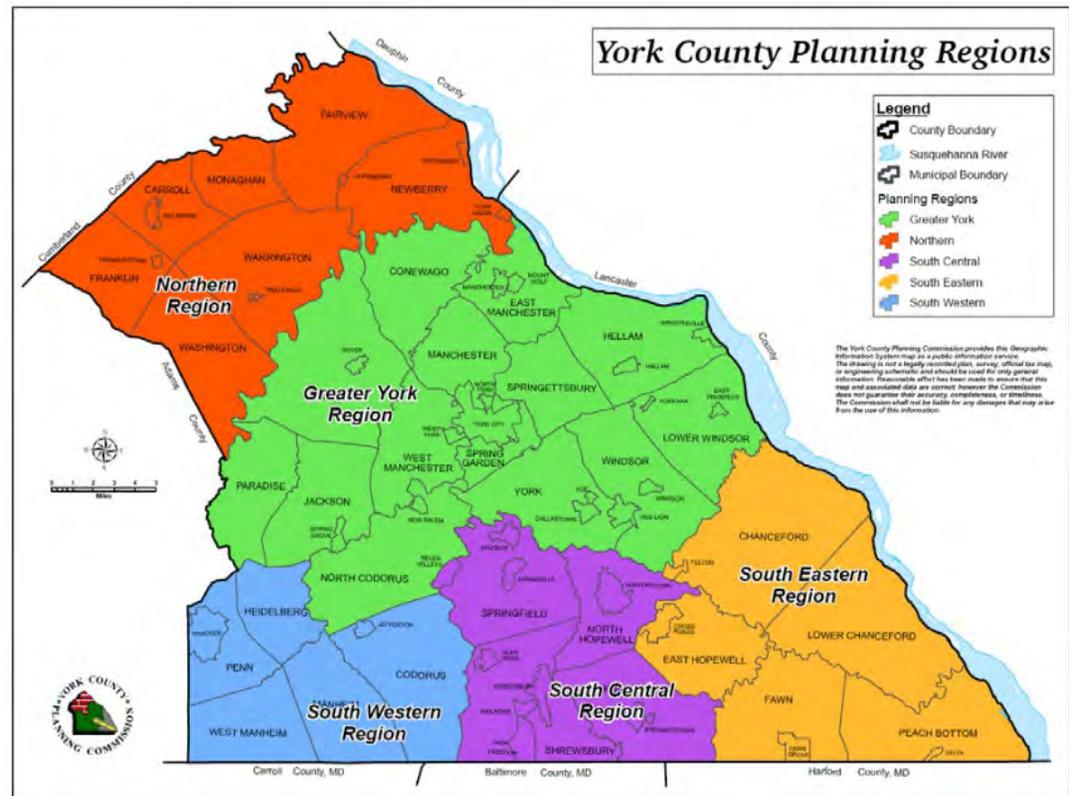
## County Economic Development Vision

The York County Economic Development Plan articulates a countywide vision for continued economic performance, guiding county and partnered investment by location and industry type or sector. The plan supports economic reinvestment in existing buildings, commercial corridors, and business and industrial parks, as well as in areas planned or designated for future economic development. In terms of industry sectors, the plan leans into the county’s manufacturing and industrial strength, complemented by retail, agricultural, and service sectors—both public and private/professional.

The countywide plan also presents vision statements for each of the county’s planning regions. The Exit 26 planning area lies within the Greater York Planning Region, the largest planning region in the County (Figure 48). Key points of the vision statement for the Greater York Region are listed below:

- Small business retention and expansion where infrastructure supports growth.
- Neighborhood-serving, smaller-scale retail expansion that addresses the daily needs of residents.
- Revitalization and infill development (redevelopment).
- Development of community/cultural facilities and services (e.g., including a youth center, playground, performing arts center, library, and medical clinic).
- Conservation of rural and scenic areas.
- Commercial corridor development that is accessible via alternative modes of transportation (e.g., walking, bicycling, and/or bus).

Figure 48: York County Planning Regions



**Figure 49: Industry Cluster Targets and Space Requirements**

Space Type	Current Strengths Strong National Performer, Current Local Specialization	High-Priority Retention Targets Lagging National Performer, Current Local Specialization	Emerging Strengths Strong National Performer, Not a Current Local Specialization
<b>Industrial Space</b>	<ul style="list-style-type: none"> <li>• AMDM*: Vehicle/Vehicle Equipment</li> <li>• Logistics/Transportation</li> </ul>	<ul style="list-style-type: none"> <li>• Energy</li> <li>• AMDM: Metals/Metal Fabrication</li> <li>• AMDM: Printing</li> <li>• Building and Construction</li> <li>• Agriculture and Food Production</li> </ul>	<ul style="list-style-type: none"> <li>• Bio-Medical</li> </ul>
<b>Office Space</b>			<ul style="list-style-type: none"> <li>• Health Care</li> <li>• Business and Financial Services</li> </ul>
<b>Other Space (e.g., Agricultural and Institutional)</b>		<ul style="list-style-type: none"> <li>• Agriculture and Food Production</li> </ul>	<ul style="list-style-type: none"> <li>• Health Care</li> </ul>

\*Advanced Materials and Diversified Manufacturing Source: YCPC, YCEA York County Economic Development Plan 2014 Update

**Industry Cluster Targets**

The plan also identified 10 industry cluster targets as a focus for industry retention and attraction, as well as to identify and address issues and barriers to economic development. An industry cluster is a geographical concentration of related industries in a defined location, making that location uniquely competitive for investment and job creation. Identifying target clusters helps to focus economic development efforts for a particular area. Figure 49 categorizes these industry targets as current strengths, retention targets, and emerging strengths and

identifies the types of space needed to support each industry target.

**Recent Industrial Development**

Based on review of building permit data, 79 non-residential development projects invested nearly \$1.2 billion in York County from 2010 to 2019, with 20 percent invested in Exit 26 planning-area municipalities.

Between 2010 and 2019, 23 industrial projects, or 44 percent of industrial building permits in the county, were issued in Exit 26 planning-area municipalities. This investment represents 52 percent of industrial investment value

in the county. Manchester Township issued 10 industrial building permits; East Manchester Township, 9; and Conewago Township, 4.

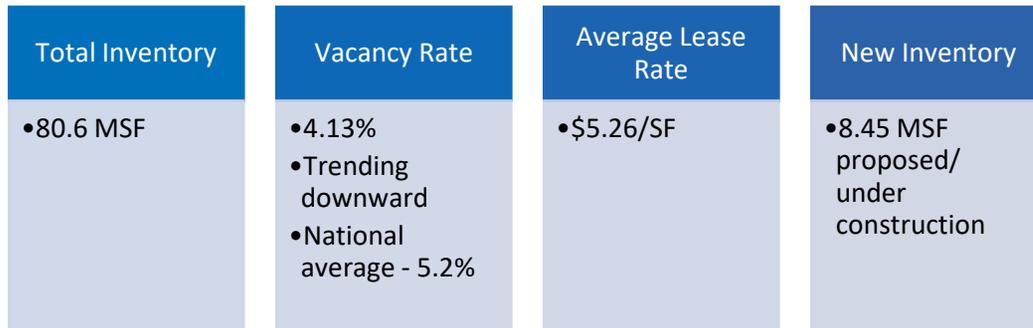
Commercial activity in the planning area was slightly lower—a total of 19 permits issued in Exit 26 planning-area municipalities, or 9 percent of all commercial building permits in the county, representing 10 percent of all commercial investment value. Eleven commercial building permits were issued in Manchester Township, 6 in East Manchester Township, and 1 each in Conewago Township and Manchester Borough. See Figure 50.

Figure 50: Building Permits Issued by Type & Value, 2010–2019

Geography		Exit 26 Municipalities	Percent of County	Greater York Region	Percent of County	York County
Number of Building Permits	Commercial	19	9%	131	59%	223
	Industrial	23	44%	39	75%	52
	Public	4	15%	14	52%	27
	Total	1,047	12%	3741	44%	8,589
Value of Building Permits	Commercial	\$43,681,501	10%	\$336,353,963	76%	\$440,324,100
	Industrial	\$179,340,238	52%	\$215,067,776	62%	\$346,338,986
	Public	\$17,155,832	4%	\$125,339,018	31%	\$401,326,613
	Total	\$403,054,795	16%	\$1,285,710,331	49%	\$2,598,358,061

Source: YCPC, Gannett Fleming, Inc.

Figure 51: York County Industrial Market Trends



Source: ROCK 2nd Quarter 2020 Market Reports.

### 2020 Industrial Market Conditions

York County’s current industrial market conditions in terms of space, vacancy, lease rates, and inventory are summarized in Figure 51.

### Industry Cluster Targets

In 2020, York County’s industrial space needs were driven primarily by warehouse distribution and manufacturing of various types. Factors driving growth in each industry cluster are summarized below. Note that not all industry clusters are identified, and the list of factors is not exhaustive.

#### Warehouse Distribution (Logistics/Transportation)

- Nationally, **e-commerce and online shopping** have been increasing

demand for warehouse distribution space. Consumers are requiring faster turnaround times on orders, including pharmaceuticals from local producers such as Pfizer and Bayer. Goods storage and distribution locations proximate to population is key to quick delivery. The COVID-19 pandemic expanded the demand from dry warehouse space to cold storage space for foods, driven by increased home delivery of groceries.

- York County’s **location**, within a four-hour drive of more than 42 million people, including the Port of Baltimore, Port of New York and New Jersey, and PhilaPort, makes it a good location for import/export businesses.
- The **I-83 corridor** makes York County attractive for warehouse distribution space. Available land along the I-83 corridor becomes increasingly attractive as sites along the I-81 corridor are developed.
- York County is known **for a highly skilled, dependable workforce**. According to YCEA’s most recent site-selector profile, businesses expanding and locating in York County identified workforce as one of the county’s key attributes and noted a “strong

workforce” and “low labor costs” as advantages over other markets. Stakeholders to the County’s Economic Development Plan (2014 update) “commended York County’s labor force for its strong work ethic.”<sup>5</sup>

- **Available and site-ready sewer, water, broadband, and electricity** are requirements for any type of development. Electricity is a priority need for warehouse distribution facilities. Increased automation as well as cold storage require more power—sometimes double or triple the typical industrial electrical requirement. YCEA noted that upfront partnerships between the electric utility (MetEd) and real estate developers and tenants is required to ensure cold storage warehouse space is delivered efficiently.

#### Vehicle/Vehicle Equipment Manufacturing

For decades, the manufacturing sector has been the backbone for York County’s industrial growth. YCEA notes that vehicle/vehicle equipment manufacturing continues to contribute to the county’s manufacturing strength. Factors influencing the sector include:

- Vehicle/vehicle equipment manufacturing companies rely on the **strong supply chain network** in York County. According to YCEA, Harley-Davidson recently relocated some manufacturing from Kansas City back to York County to be closer to parts manufacturers. BAE Systems, a manufacturer specializing in the rehabilitation and construction of military vehicles for the U.S. Department of Defense, also relies on the automotive supply chain available in York County.
- The skill sets and work ethic of the **workforce** continue to make York County attractive to manufacturers. However, YCEA reports that finding additional skilled labor is an increasing challenge, especially during the global pandemic.

#### Agriculture and Food Production

York County is known as a location for food production with companies including Utz, Snyder’s of Hanover, and Starbucks.

- As noted above, available utilities are requirements of any manufacturer. Food production relies heavily on **water** for processing and

<sup>5</sup> Ibid., p. 30.

corresponding **wastewater** treatment capacity for production effluent discharge. When YCEA receives requests to site food processing facilities in York County, site search is generally limited to existing, underutilized food processing facilities or to sites within the sewer service areas of Springettsbury Township or York City where capacity is available to handle large effluent discharge.

#### Energy: Solar

Across Pennsylvania, renewable energy generation companies have been seeking locations to site solar farms. In York County, a proposed solar farm in Conewago Township—Strinestown Solar Farm—would be a \$75 million investment by Dakota Power Partners.<sup>6</sup> Several factors influence the increased interest in solar.

- Solar installations have sought to fill capacity in Pennsylvania’s transmission infrastructure left vacant by **declining power generation from coal**.

<sup>6</sup> York Daily Record. State’s largest solar farm might land in York County, \$75 Million project could power 13,000 homes. March 15, 2019. Accessed 10/15/20 at: <https://www.ydr.com/story/news/2019/03/15>

- Solar farms are compatible with agriculture; the combined land uses are known as agrivoltaics. Farmland offers open, flat, dry land on which to build solar arrays. Dakota Power Partners, the solar developer proposing installation in Conewago Township, is designing a solar project in southern New Jersey that will collocate solar with sheep.<sup>7</sup> The sheep will graze the land beneath the solar arrays, minimizing the need for mowing. Blue Wave Solar in Boston is working on several projects combining solar arrays with vegetable farming.<sup>8</sup>
- In addition, if farmland is at least 25 acres in size and located within two miles of an electric substation, it meets minimum requirements to efficiently **deliver power to market via the electric grid**.

#### Building and Construction

With the increased demand for warehouse space, the building and construction industry is active in York County. York County-based contractors, such as Kinsley,

[/states-largest-solar-farm-might-land-york-county-75-m-project/3160617002/](https://www.npr.org/2020/10/09/919225272/how-to-have-your-solar-farm-and-keep-your-regular-farm-too).

<sup>7</sup> NPR, How to Have Your Solar Farm and Keep Your Regular Farm, Too. October 9, 2020. Accessed 10/15/20 at:

are actively building contract and speculative warehouses.

- As noted with both the warehouse distribution and manufacturing sectors, the availability of a **skilled workforce** benefits the building and construction industry as well. Skilled workers from all trades are needed for contractors to keep pace with construction project demands.

#### **Industrial Real Estate Potential**

Due to the presence of I-83 and existing industrial growth that has already occurred, is planned, or is under construction, the Exit 26 planning area is viable for continued industrial growth. The exact location and acceptable amounts of industrial growth are dependent on variables such as local zoning and utility availability and capacity, as well as housing and transportation conditions.

<https://www.npr.org/2020/10/09/919225272/how-to-have-your-solar-farm-and-keep-your-regular-farm-too>.

<sup>8</sup> Ibid.

### Proposed Industrial Development

Planning-area municipalities identified seven industrial developments that have been recently constructed or proposed within the Exit 26 planning area and another five nearby. Within the planning area, four are recently completed: two in East Manchester Township’s commercial zoning district along Canal Road and two in its industrial zoning district. Two proposed industrial developments are located in Conewago Township and one is in East Manchester Township, all in industrial zoning districts. Outside the planning area, recently completed and proposed industrial development has located in industrial zoning districts in all three townships and has proposed expansion of lands used by industry in Conewago Township.

See Map 13: Recent and Proposed Development for locations.

### Office Market

York County’s current office market conditions in terms of space, vacancy, lease rates, and inventory are summarized in Figure 52.

The office market in York County and Central Pennsylvania is in a better competitive position as compared to office markets in major metropolitan areas. The

Figure 52: York County Office Market Trends



Source: ROCK 2nd Quarter 2020 Market Reports

office vacancy rate nationally is 13.7 percent while York County’s office vacancy rate is 5.66 percent.

### Factors Affecting the Office Market

Factors influencing the County’s office space market include:

- Although office space demand is traditionally determined by the growth in office-based businesses, the impact of the **COVID-19 pandemic** has yet to be fully realized. The county economic development plan estimated average new office space demand of 91,650 SF per year with annual office space growth of 1.8 percent. The impact of the pandemic and rapid shift to remote working for many office employees will likely decrease demand for office space for some industry sectors. Larger

companies may downsize office space as employees choose to work from home regularly. Smaller companies may upsize to make more room for social distancing.

- **Health Care** is an industry resilient to economic fluctuations; new office space will likely be needed to serve York County’s growing population. Continued expansion of WellSpan has resulted in increased specialty medical services and facilities. Medical office space needed for urgent care and family practitioners is growing consistent with population growth. ROCK Real Estate notes that a physician’s office requires an average of 5,000 SF and health care administrative offices require an average of 10,000 SF.
- Future office space for sectors such as **Business and Financial Services** will

most likely be influenced by the impact of the current global pandemic. If the need for office space decreases as more office-based employees continue to work from home, the existing office space inventory may prove adequate to meet future demand.

**Office Real Estate Potential**

The Exit 26 planning area provides the opportunity to locate small community-scale medical office space to serve the needs of current and future residents. With population in Exit 26 planning-area municipalities projected to grow by 25 percent—to 51,405—by 2040, additional medical office space would serve the needs of residents.

**Proposed Commercial Office Development**

No commercial office development was identified as recently completed or proposed in the planning area.

**Retail Market**

York County’s current retail market conditions in terms of inventory, vacancy, and lease rates are summarized in Figure 53.

**Figure 53: York County Retail Market Trends**

Total Inventory	Vacancy Rate	Absorption	Average Lease Rate
<ul style="list-style-type: none"> <li>•28.86 MSF</li> </ul>	<ul style="list-style-type: none"> <li>•7.97%</li> <li>•Upward trending</li> <li>•National average - 6.8%</li> </ul>	<ul style="list-style-type: none"> <li>•Negative plus increasing vacancy - suggests supply outpacing demand</li> </ul>	<ul style="list-style-type: none"> <li>•\$10.89/SF</li> <li>•Declining</li> <li>•Reflecting leases in convenience &amp; street retail compared to large shopping centers</li> </ul>

Source: ROCK 2nd Quarter 2020 Market Reports.

Demand for retail space is closely tied to growth in households. The County Economic Development Plan compared retail space to households to project retail demand. Projected average retail space demand per year was 91,797 SF with an annual growth rate of 2.3 percent. This is contrary to 2020 conditions that reflect increasing vacancy and suggest that retail supply is outpacing demand.

**Factors Affecting the Retail Market**

Factors influencing retail space across the nation and in York County include:

- **Increased e-commerce and online shopping** have significantly impacted

brick-and-mortar retail space. With fewer consumers traveling to physical locations to browse and make selections for purchase, far less space is required for retail uses. This phenomenon is termed the “retail apocalypse” in many business journals. Retail space analytics firm Coresight documented 9,300 retail store closures in 2019, up 50 percent from 2018 at 5,844.<sup>9</sup>

- In addition to service retail meeting day-to-day food and household needs, retail spaces that offer **unique shopping experiences** targeted toward niche consumer needs are

<sup>9</sup> Coresight <https://www.cnbc.com/2020/06/09/coresight->

[predicts-record-25000-retail-stores-will-close-in-2020.html](https://www.cnbc.com/2020/06/09/coresight-predicts-record-25000-retail-stores-will-close-in-2020.html)

thriving. Retailers are continuing to strengthen their businesses by identifying the optimal balance of e-commerce and brick-and-mortar.<sup>10</sup>

- As a result of the above, the forecast for traditional shopping malls and strip malls has been rapidly shifting. Some large **retail spaces are being repurposed** into warehouse distribution facilities, medical facilities, and all-in-one lifestyle centers. While this is not occurring in York County, CBRE Group identified 24 projects since 2016 in which developers turned closed malls and shopping centers into logistics properties.<sup>11</sup> In York County, the former Sears store at the York Galleria is being repurposed for gaming. Hollywood Casino York is scheduled to open in 2021.<sup>12</sup> YCEA reports interest in locating call centers in York Galleria. Two floors of open space combined with ample parking meets requirements for such facilities.
- The full impact of the COVID-19 pandemic on the already declining retail industry is not fully realized;

however, it has resulted in several significant retail trends. While larger retailers like Walmart, Lowes, and grocery stores are increasing profitability, smaller retailers relying on foot traffic are being impacted. A 50 percent loss in foot traffic caused national chains Dunkin' Donuts and Starbucks to close many locations, focusing on drive-through stores. U.S. travel spending is 44 percent lower than in 2019 due to the global pandemic. This has resulted in the loss of \$396 billion for the U.S. travel industry and the loss of \$50.9 billion in federal, state, and local tax revenue from March through September 2020.<sup>13</sup>

### Retail Real Estate Potential

Portions of the Exit 26 planning area could serve small-scale retail to meet the daily needs of both residents and businesses. Small-scale retail could include small-footprint storefronts for dining, groceries,

general merchandise, personal services, and fuel.

### Proposed Retail Development

Planning-area municipalities identified only one commercial development, Sheetz near Exit 28, that was recently constructed within the Exit 26 planning area. See Map 13: Recent and Proposed Development for location.

### Public Use Outlook

The need for public facility development, such as schools, parks and recreational areas, public safety and emergency services, and waste management, is driven in large part by residential and economic growth.

When asked if projected growth would require the expansion of existing public facilities or the development of new ones, municipal representatives indicated no current needs or plans for public facilities. However, both Central York and Northeastern School Districts reported that additional residential development would increase enrollment, only some of

<sup>10</sup>Deloitte/NAR, Expectations & Market Realities in Real Estate 2020, p. 40.

<sup>11</sup> Marcus & Millichap, Amazon to Convert Another Dead Mall into a Fulfillment Center, July 24, 2019. Accessed 10/15/20 at: <http://www.iaconoretailgroup.com/amazon->

[to-convert-another-dead-mall-into-a-fulfillment-center/](http://www.iaconoretailgroup.com/amazon-to-convert-another-dead-mall-into-a-fulfillment-center/).

<sup>12</sup> York Daily Record. Mini-casino at the York Galleria: Opening date has been pushed back. August 20, 2020. Accessed 10/15/20 at: <https://www.ydr.com/story/news/2020/08/20>

[/mini-casino-york-galleria-opening-pushed-back-until-later-2021/5616191002/](http://www.iaconoretailgroup.com/amazon-to-convert-another-dead-mall-into-a-fulfillment-center/).

<sup>13</sup> ROCK Commercial Real Estate. October 7, 2020.

which could be accommodated without the addition of new facilities.

### **Municipal**

Municipal comprehensive plans provide documentation of community needs and public policy to address land use management and other community and economic conditions. The comprehensive plans of the planning-area municipalities were adopted 8 to 16 years ago. Though dated, they are the most recent comprehensive municipal policy documents.

Key community needs and policy statements are summarized in the following tables as a listing of potentially still relevant needs.

HOUSING	Needs	Policy & Recommendations
Conewago Township 2008 Comprehensive Plan	<ul style="list-style-type: none"> <li>Recognizes residential development pressure due to township’s easy access to employment centers, availability of sewer and water, and a high quality of life.</li> </ul>	<ul style="list-style-type: none"> <li>Encourage infill and expansion of settled areas when public water and sewer facilities of adequate capacity and functionality are available.</li> <li>Encourage new mixed-use neighborhoods.</li> </ul>
East Manchester Township 2005 Comprehensive Plan	<ul style="list-style-type: none"> <li>Determined the township has an adequate amount of housing and areas to accommodate housing growth through 2025.</li> </ul>	<ul style="list-style-type: none"> <li>Implement a combination of the apartment/office and high-density residential (R-3) residential zoning districts and evaluate the possibility of revising or incorporating the village and commercial districts.</li> </ul>
Manchester Township 2004 Comprehensive Plan	<ul style="list-style-type: none"> <li>Found a housing shortage.</li> <li>Noted that the township offers housing with more amenities at a lower price than other locations.</li> <li>Recognized that different households need different types of housing. Lower-income households cannot always afford to purchase a home and seek affordable rental housing options instead. Older citizens seek low-maintenance housing options such as apartments, condominiums, or assisted living centers.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Manchester Borough 2012 Comprehensive Plan	<ul style="list-style-type: none"> <li>Identified a need for 1,013 units (20.7% increase) to meet the projected 2030 housing need.</li> </ul>	<ul style="list-style-type: none"> <li>Identifies infill of single-family homes on vacant parcels in residential neighborhoods and the adaptive reuse of vacant and underutilized commercial buildings into housing in the downtown. The Borough also specifies strategies for home occupations and live–work housing and employment options while maintaining the Borough’s historic character.</li> </ul>
York County Growth Management Plan: Envision 2040 (2017)	<ul style="list-style-type: none"> <li>Identified the need to increase York County’s housing units by 20% (an additional 36,832 housing units), between 2015 and 2040.</li> <li>Assumptions based on average household size at remaining consistent at 2.58 persons per household (year 2010), the percentage of total population living in</li> </ul>	<ul style="list-style-type: none"> <li>Recommends continued use of growth management areas (Established Growth and Rural Areas) to guide growth.</li> <li>Recommends implementing the YES 2040 preferred Resource Protection Scenario, which plans for projected growth based on maximizing the protection of natural and historic resources.</li> </ul>

HOUSING	Needs	Policy & Recommendations
	<p>group quarters remains consistent 2010 at 1.9% (year 2010), and a housing vacancy rate of 5%.</p>	<p>Eliminating resource impact and focusing importance on public transit and centralizing development to areas where infrastructure, jobs, and services are available.</p> <ul style="list-style-type: none"> <li>• Establishes that a residential development consisting of 50 or more lots or units is considered a Proposed Development of Regional Significance and Impact, requiring the host municipality to carefully review the proposed development for needed services and mitigate any possible adverse impacts.</li> <li>• Provide for a diversity of dwelling types, at varying densities, for people of all incomes, ages, and abilities, especially in Established Growth Areas.</li> <li>• Established policy to: Improve existing housing stock through the County’s Weatherization and Home Improvement Programs; provide assistance and support to first time homebuyers through the York Homebuyer Assistance Program; create new affordable housing opportunities within Established Growth Areas through the County’s HOME funds; provide administration for the York County Continuum of Care to address homelessness throughout the County, including administration of the County’s ESG funds to provide funds for emergency housing to assist the homeless and administration of the County’s Homeless Management Information System (HMIS).</li> </ul>

UTILITIES	Water/Sewer Needs	Water/Sewer Policy & Recommendations
<p><b>Conewago Township 2008 Comprehensive Plan</b></p>	<ul style="list-style-type: none"> <li>Identified that York Water Company has future capacity to meet the township’s needs for the next 20 years.</li> </ul>	<ul style="list-style-type: none"> <li>Identified an upgrade to the Conewago Township Wastewater Treatment Plant to be complete in 2023 that will raise residential supply from 485 to 2,162.</li> <li>Provide necessary community facilities and services to township residents in an efficient, cost-effective, and quality manner within the financial resources of the township.</li> <li>Coordinating land use and sewer and water planning to ensure the extension of public sewer and water facilities is consistent with land use and other goals and objectives.</li> </ul>
<p><b>East Manchester Twp 2005 Comprehensive Plan</b></p>	<ul style="list-style-type: none"> <li>Determined that water and sewer service is adequate.</li> </ul>	<ul style="list-style-type: none"> <li>Recommended no improvements.</li> </ul>
<p><b>Manchester Township 2004 Comprehensive Plan</b></p>	<ul style="list-style-type: none"> <li>Identified a need to extend central water service along Westwind Lane, which extends from Greenbriar Road to Mill Creek Road.</li> <li>Noted that if development occurs west of I-83 along Bear Road, the Township will need to arrange for sewage service from the York or Springettsbury sewer systems or Northeastern York County Sewage Authority.</li> </ul>	<ul style="list-style-type: none"> <li>Recommended that central water service be extended to all areas of the township as land is developed; work with York Water Company, residents, and developers of adjacent land to bring central water service to concentrations of development currently dependent upon individual wells.</li> <li>Recommended adequate sewage services to lands southwest of the new interchange of I-83, if the interchange moves forward.</li> <li>Identified working with sewage service providers to make sure adequate treatment and transmission capacity will be available to serve future growth.</li> </ul>
<p><b>Manchester Borough 2012 Comprehensive Plan</b></p>	<ul style="list-style-type: none"> <li>Identified the need to continue to support the Northeastern York County Sewer Authority.</li> </ul>	<ul style="list-style-type: none"> <li>Recommended encouraging maintenance and upgrades to the sewer system.</li> </ul>

UTILITIES	Water/Sewer Needs	Water/Sewer Policy & Recommendations
<p><b>York County Growth Management Plan: Envision 2040 (2017)</b></p>	<ul style="list-style-type: none"> <li>• Identified the need to separate areas appropriate for more intensive residential, commercial, and industrial uses, and the extension of services and utilities, from areas intended for rural uses and resource protection.</li> <li>• Recognized the coordination of the development and maintenance of sewage disposal systems and potable water supply systems with comprehensive land use planning as essential for assuring safe and adequate wastewater treatment and long term, reliable potable water supplies.</li> </ul>	<ul style="list-style-type: none"> <li>• Recommended that Future Growth Areas provide for an orderly progression of development and extension of utilities if, and when, additional area is needed to accommodate future population growth and land use demand.</li> <li>• Established policy to support and advocate the extension of public utilities throughout the Established Growth Areas</li> <li>• Established policy to limit public water and sewer services to Established Growth Areas, unless necessary to address a health and safety issue in an Established Rural Area.</li> <li>• Established policy to partner with local providers (schools, health care, emergency services) to plan for future needs by sharing data (demographics, land use, utilities, proposed development).</li> <li>• Established policy to work with municipalities and utilities to develop and maintain comprehensive GIS mapping of water and sewer lines and stormwater infrastructure.</li> </ul>

PUBLIC/COMMUNITY FACILITIES & SERVICES	Needs	Policy & Recommendations
Conewago Township 2008 Comprehensive Plan	<ul style="list-style-type: none"> <li>• Stated there are three schools in Northeastern School District over 90% capacity and plans to build a new middle school were in process.</li> <li>• Noted that as township population increases, the need for open space and recreation facilities increases.</li> </ul>	<ul style="list-style-type: none"> <li>• Identify the need for additional community, cultural, and social facilities and services for all age groups in the township, and encourage provision of those facilities and services.</li> <li>• Establish the responsibility of developers for providing social and cultural facilities.</li> <li>• Identify community facilities and services that can help attract and support desired economic development.</li> </ul>
East Manchester Township 2005 Comprehensive Plan	<ul style="list-style-type: none"> <li>• Identified that major new residential developments may require future utilization of existing buildings or require the construction of new buildings in the Northeastern School District.</li> <li>• Noted that residents use township as well as York County park and recreation facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen partnerships with parks and recreation facility owners and operators for use by East Manchester Township residents.</li> </ul>
Manchester Township 2004 Comprehensive Plan	<ul style="list-style-type: none"> <li>• As population in Manchester Township continues to grow there may be a need to construct a new school in the township.</li> <li>• Identified the need to maximize the use of existing recreation facilities, particularly at public schools.</li> </ul>	<ul style="list-style-type: none"> <li>• Identified the consideration of opportunities for additional parks such as a passive park along the Little Conewago Creek.</li> </ul>
Manchester Borough 2012 Comprehensive Plan	<ul style="list-style-type: none"> <li>• Identified that smaller communities like the borough benefit from cooperative public facilities and services.</li> </ul>	<ul style="list-style-type: none"> <li>• Identified a comprehensive plan strategy to coordinate with East Manchester Township and Mount Wolf Borough on future recreation facilities and open space planning.</li> </ul>
York County Growth Management Plan: Envision 2040 (2017)	<ul style="list-style-type: none"> <li>• Identified that Growth Areas build upon and help maintain the viability of existing developed areas and that a full mixture of land uses, including a complete range of housing choices for owners and renters and ample community facilities and services, will</li> </ul>	<ul style="list-style-type: none"> <li>• Established policy to direct investment of York County housing and community development funding to improve accessibility to community facilities (ADA).</li> </ul>



be available for all generations, income levels, and abilities.

- Recognizes that Primary Growth Areas have a full ranges of land uses, housing types, services, community facilities, and infrastructure.



LOCAL TRANSPORTATION	Needs	Policy & Recommendations
Conewago Township 2008 Comprehensive Plan	<ul style="list-style-type: none"> <li>Noted the township faces the lack of a convenient and dependable east/west transportation route.</li> </ul>	<ul style="list-style-type: none"> <li>Transportation improvements identified included the Exit 26 interchange, reconfiguration of the Canal Road/Susquehanna Trail/Copenhaffer Road intersection, and several projects to address alignment, sight distance, and signalization.</li> </ul>
East Manchester Township 2005 Comprehensive Plan	<ul style="list-style-type: none"> <li>Identified that a new I-83 interchange was the top issue identified in the comprehensive plan.</li> </ul>	<ul style="list-style-type: none"> <li>Roads and locations within the planning area identified for improvement included:                             <ul style="list-style-type: none"> <li>New I-83 interchange</li> <li>Canal Road/Susquehanna Trail</li> <li>Susquehanna Trail</li> </ul> </li> <li>Extension of West Crone Road – connection between Bear Road and Susquehanna Trail</li> <li>Recommended improving pedestrian and bicycle access and safety, including seeking wider shoulders on main roads where alternative routes are not available.</li> <li>Encouraged increased use of public transit and carpooling, including providing additional park-and-ride lots, including the provision of a carpool lot at the proposed new Canal Road interchange.</li> </ul>
Manchester Township 2004 Comprehensive Plan	<ul style="list-style-type: none"> <li>Identified 32 transportation projects.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Manchester Borough 2012 Comprehensive Plan	<ul style="list-style-type: none"> <li>Identified several transportation needs to improve vehicular and bicycle and pedestrian transportation.                             <ul style="list-style-type: none"> <li>Consider traffic calming techniques like curb extensions or bulb-outs, gateway entrance treatments, on-street parking, and textured crosswalks for easing the impact of traffic through the borough.</li> <li>Encourage pedestrian access to Northeastern School District Facilities.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>

LOCAL TRANSPORTATION	Needs	Policy & Recommendations
	<ul style="list-style-type: none"> <li>○ Consider streetscape amenities in downtown revitalization efforts.</li> <li>○ Support Commuter Services of PA to reduce daily vehicle trips by residents.</li> </ul>	
<p><b>2017-2040 York Area MPO Metropolitan Transportation Plan</b></p>	<ul style="list-style-type: none"> <li>● Re-timing of traffic signal systems based on congestion and proximity to other signals</li> <li>● Repair or replacement of state bridges over eight feet in length, local bridges over 20 feet in length, and all county bridges generally based on age of the structure.</li> <li>● Capacity increases at congested intersections and interchanges.</li> <li>● Install missing sidewalks near schools.</li> <li>● Implement streetscapes within commercial or mixed-use areas within Boroughs.</li> <li>● Identify needs for the other areas of the enhancement category.</li> <li>● Maintain state-owned and local road pavement.</li> <li>● Maintain roadside signage.</li> <li>● Complete various safety studies to identify needs.</li> </ul>	<ul style="list-style-type: none"> <li>● Address signal timing optimization for traffic signals identified through the Congestion Management Process</li> <li>● Advance priority congested segments, intersections, and interchanges to a future MTP/TIP update.</li> <li>● Improve bus stops to meet requirements of the Americans with Disabilities Act and enhance use.</li> <li>● Maintain state-owned and local road pavement and roadside signage.</li> </ul>

LAND & RESOURCE PROTECTION	Needs	Policy & Recommendations
Conewago Township 2008 Comprehensive Plan	<ul style="list-style-type: none"> <li>Identified the need to preserve existing productive farmland for agricultural use and support agricultural and agricultural support operations.</li> </ul>	<ul style="list-style-type: none"> <li>Protecting groundwater and surface water resources.</li> <li>Protecting woodlands.</li> <li>Protecting important Natural Areas identified in the York County Natural Areas Inventory.</li> <li>Preserving watershed, stream corridors, floodplains, wetlands, and recharge areas.</li> <li>Protecting steep slopes.</li> <li>Preserving natural wildlife habitats.</li> <li>Preventing air quality deterioration.</li> </ul>
East Manchester Township 2005 Comprehensive Plan	<ul style="list-style-type: none"> <li>States that East Manchester Township is not a Priority Preservation Township per YCPC.</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Manchester Township 2004 Comprehensive Plan	<ul style="list-style-type: none"> <li>None</li> </ul>	<ul style="list-style-type: none"> <li>Seek to maintain agricultural activities in portions of the township.</li> <li>Encourage the designation of additional agricultural security areas.</li> <li>Continue to promote use of agricultural easements to preserve farmland.</li> <li>Take full advantage of other funding sources for land preservation, including connecting interested landowners with available resources and publicizing tax benefits.</li> <li>Permit a range of farm-based businesses.</li> <li>Preserve areas along major creeks in as natural a condition as possible.</li> <li>Protect the amounts and quantity of groundwater and creek waters. Stress recharge of stormwater into the ground to maintain groundwater supplies and reduce stormwater runoff.</li> <li>Carefully minimize sinkhole threats in limestone areas.</li> </ul>

LAND & RESOURCE PROTECTION	Needs	Policy & Recommendations
		<ul style="list-style-type: none"> <li>• Make sure that any changes to suspected wetlands comply with state and federal regulations.</li> <li>• Minimize development on steeply sloped lands.</li> <li>• Carefully manage wooded areas and avoid clear-cutting.</li> <li>• Carefully control large-scale withdrawals of groundwater and spring water.</li> <li>• Seek extensions of central water and sewage systems where needed and cost-effective.</li> </ul>
Manchester Borough 2012 Comprehensive Plan	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
York County Growth Management Plan: Envision 2040 (2017)	<ul style="list-style-type: none"> <li>• Identified the need to provide more guidance on how to maintain Growth and Rural Areas to protect resources, and manage growth and resources in a positive way to meet the needs of the present generation without compromising the ability to meet the needs of future generations.</li> <li>• Identified a Vision for the Future where a balance is achieved between: promoting economic growth and prosperity; protecting or preserving important historic, cultural, and natural resources; maintaining the esteemed quality of life that residents cherish.</li> <li>• Identified a goal to protect and conserve the County’s important natural resources and a goal to protect and conserve the County’s important cultural and historic resources.</li> </ul>	<ul style="list-style-type: none"> <li>• Established policy to: protect significant natural resources, especially in Established Rural Areas, protect prime and productive agricultural land in Established Rural Areas, protect heritage resources.</li> <li>• Established policy to provide training and technical assistance to municipalities on the use of planning tools for: natural resource protection such as zoning overlays, effective agricultural protection zoning, acquisition of flood prone areas, and source water protection plans; historic preservation such as overlay zones, ordinance provisions, and the process to have National Register “eligible” properties become “listed”.</li> </ul>