



**2019 UPDATE**  
**Tippecanoe County**  
**Student Rental Report & Survey**  
**The Area Plan Commission of Tippecanoe County**  
**November 2019**

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## **ACKNOWLEDGEMENTS**

This report update could not have been produced without the kind assistance of the following:

- Purdue University: Off-Campus Student Services, Housing & Food Services, Office of Enrollment Management Analysis and Reporting, Parking & Transportation Services, Fire Department, Physical Facilities, and the Office of Fraternity, Sorority, and Cooperative Life.
- City of West Lafayette: Department of Engineering, Department of Development, and the Department of Information Technology.
- Area Plan Commission intern Derek Paz who led numerous data gathering and analysis efforts and conducted the landlord survey.
- The landlords and management companies who graciously participated in our survey.

## **INTRODUCTION**

This update continues to build our storehouse of data by augmenting our previous reports with the latest information. As with the previous reports, our objective is to identify emerging trends in the state of our community's student and multi-family housing market to better inform elected and appointed officials as they make decisions on future developments both near campus and countywide.

This report contains four parts:

1. Analysis of existing data and other relevant public information;
2. Analysis of vacancy data and survey results;
3. Conclusions and recommendations; and
4. Appendix.

The first part involves a review of a variety of data sources containing historical and current information regarding population and housing. The second part involves an analysis of vacancy data from HUD/USPS concerning residential vacancies by census tract and the results of our survey. The third part draws conclusions from the data sets and survey results and identifies any patterns or trends that the data may reveal.

## **PART 1: DATA & INVENTORY**

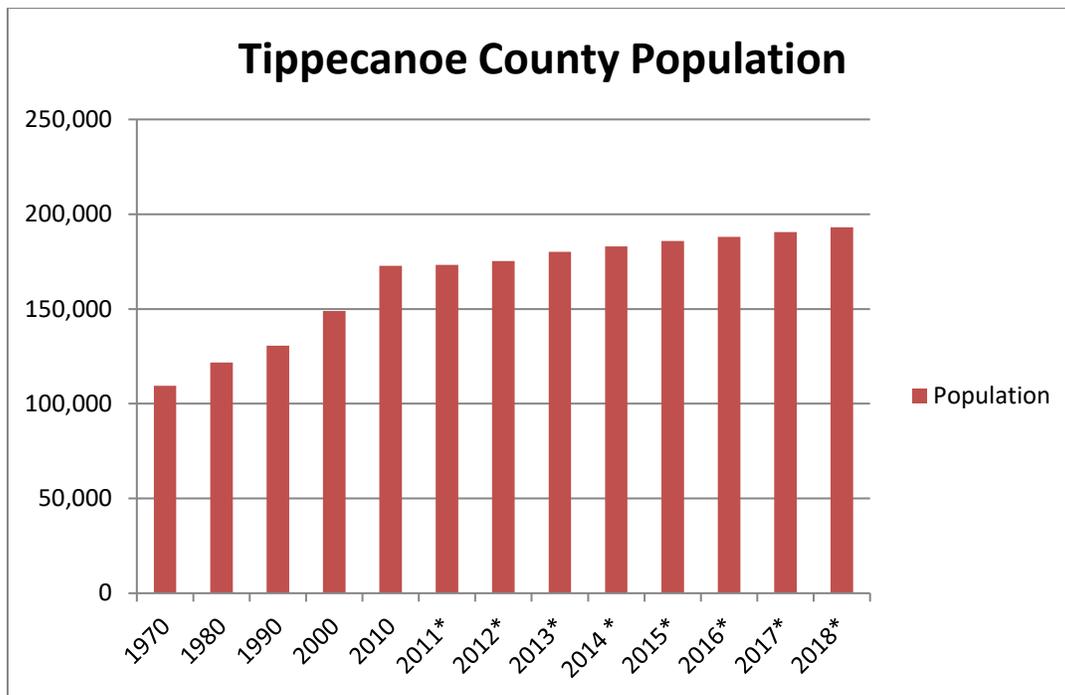
Multiple sources were used to capture as much relevant public information as possible pertaining to the status of student-oriented housing. The entities that provided data included:

1. US Bureau of the Census
2. US Department of Housing and Urban Development & US Postal Service
3. Purdue University
4. Tippecanoe County Assessor
5. City of West Lafayette Rental Inspection Program

### **The 2010 Census and Census Estimates**

According to the Census, the total population of Tippecanoe County in 2010 was 172,780 persons. Population growth county-wide is projected to remain steady in future years as reflected in the Census estimates for 2011 (173,186), 2012 (175,204), 2013 (180,174), 2014 (183,074), 2015 (185,826), 2016 (188,059), 2017 (190,587), and 2018 (193,048). This estimated growth represents an approximate 11.7% increase between 2010 and 2018 and a 1.3% increase in the population's projected growth rate reported in last year's report.

**Figure 1 – Tippecanoe County Population 1970-2018**

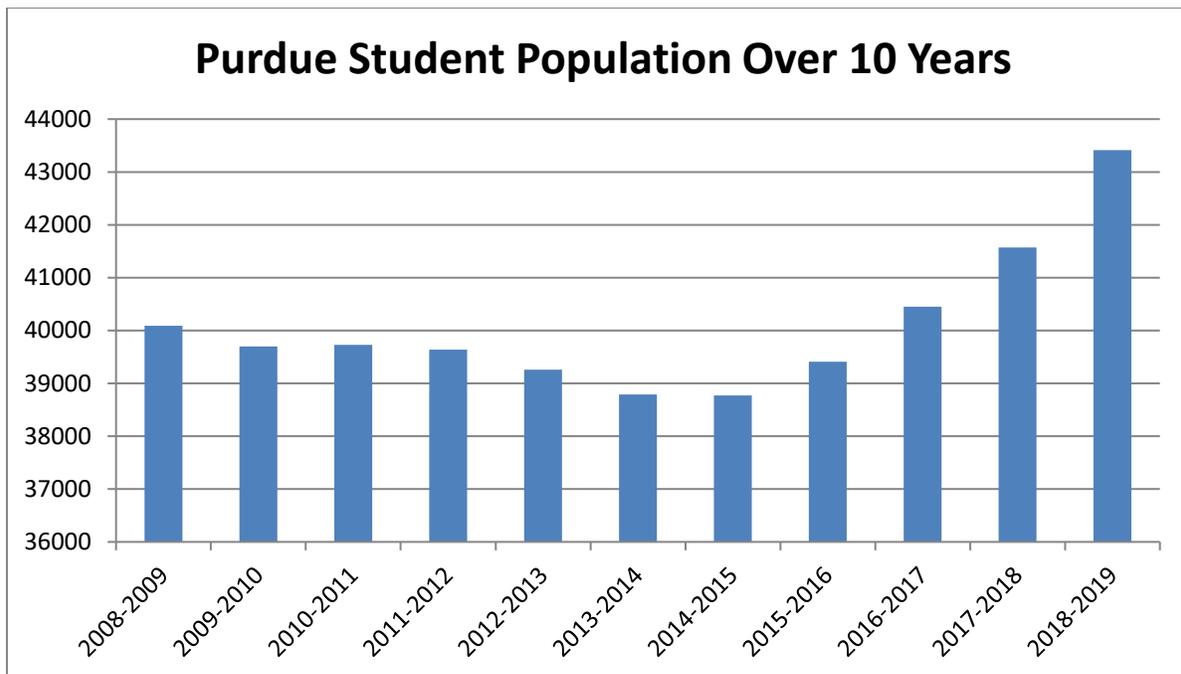


Source: US Bureau of the Census (\* indicates estimate only)

## Purdue University Student Population

At the start of the fall 2018 semester, the total student population (both undergraduate and graduate students) of the West Lafayette campus of Purdue University was 43,411 students. Compared to the previous year (41,573 students), this represents an approximate 4.4% increase in population. As shown in Figure 2 below, the fall 2018 population figure is the highest recorded not only within the last ten years but the highest recorded in the university's history.

**Figure 2 – Purdue Student Population 2008 – 2018**



*Source: Purdue University – Office of Enrollment Management Analysis and Reporting*

## Purdue University Housing

In the fall of 2018, Purdue University Housing's capacity totaled 13,625 on-campus bedspaces and 588 off-campus bedspaces for a grand total of 14,213 bedspaces. Occupancy in both sets consisted of 13,490 on-campus bedspaces occupied and 478 off-campus bedspaces occupied making for an overall vacancy rate (combining on/off-campus bedspace occupancy) of 1.7%. Of the 43,411 students enrolled at the West Lafayette campus beginning in the fall of 2018 there were 13,968 students living in university owned or leased housing units (an increase of 780 students from the previous year) and 29,443 students living in non-university housing situations (an increase of 1,058 students from the previous year).

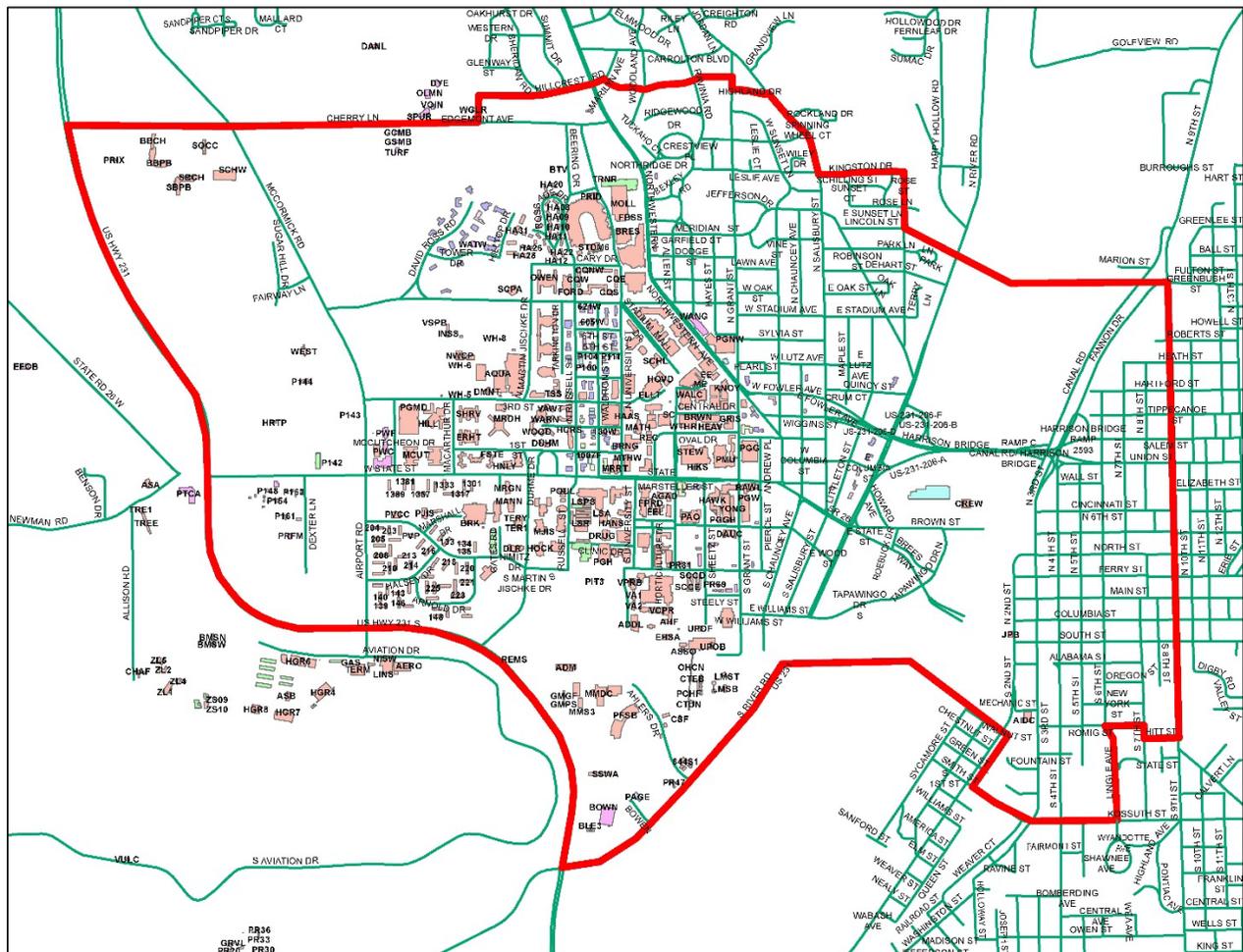
## Purdue University Fraternities, Sororities and Cooperatives

Of the 29,443 students living off-campus during the fall 2018 semester, 3,379 lived in a fraternity, sorority or cooperative (an increase of 183 students from the previous year). The total capacity among the 66 houses was 3,998 persons (a capacity decrease of 173 persons from the previous year despite no change in the number of houses).

## Purdue University Parking

The “C” parking permit is required for all commuter students who seek to park their vehicle on campus and reside outside the University-imposed, near-campus boundary. Those students living within the boundary but not on campus are generally not eligible for a commuter “C” parking permit. As illustrated in Figure 3, the boundary surrounds the campus and is roughly rectangular.

Figure 3 – Parking Permit C (Commuter Permit Exclusion) Boundary



Source: Purdue University Parking & Transportation Services

For the fall of 2018, Purdue University’s Parking and Transportation Services Office issued 4,641 “C” permits for those commuter students who resided beyond this boundary surrounding campus (an increase of 331 permits from the previous year).

<b>Purdue Commuter Student Parking Facility</b>	<b>Number of C-permits issued</b>
C Parking Lots	4,121
Northwestern Garage	145
Wood Street Garage	195
Grant Street Garage	None Sold
Harrison Street Garage	180
<b>Total</b>	<b>4,641</b>

For the purposes of this report, it is assumed that the majority of the 21,423 remaining off-campus students who are ineligible to apply for “C” permits and don’t live in a fraternity, sorority or co-op likely lived within the C-permit exclusion boundary. These 21,423 students represent an increase (approximately 2.61%) from last year’s 20,879 students.

City of West Lafayette Rental Inspection Program Data

The City of West Lafayette continues to operate its rental inspection program. As of September 2019, the city’s rental inspection database consisted of 11,014 units containing 23,070 bedrooms. These figures represent an approximate 1.52% increase in units and a 0.07% increase in bedrooms from last year’s report.

Of these West Lafayette rental units, there were:

- 866 single-family dwellings containing 2,842 bedrooms
- 236 dwellings in two-family buildings containing 573 bedrooms
- 168 dwellings in three-family buildings containing 345 bedrooms
- 9,744 dwellings in multi-family buildings containing 19,310 bedrooms

## **PART 2: VACANY DATA & SURVEY RESULTS**

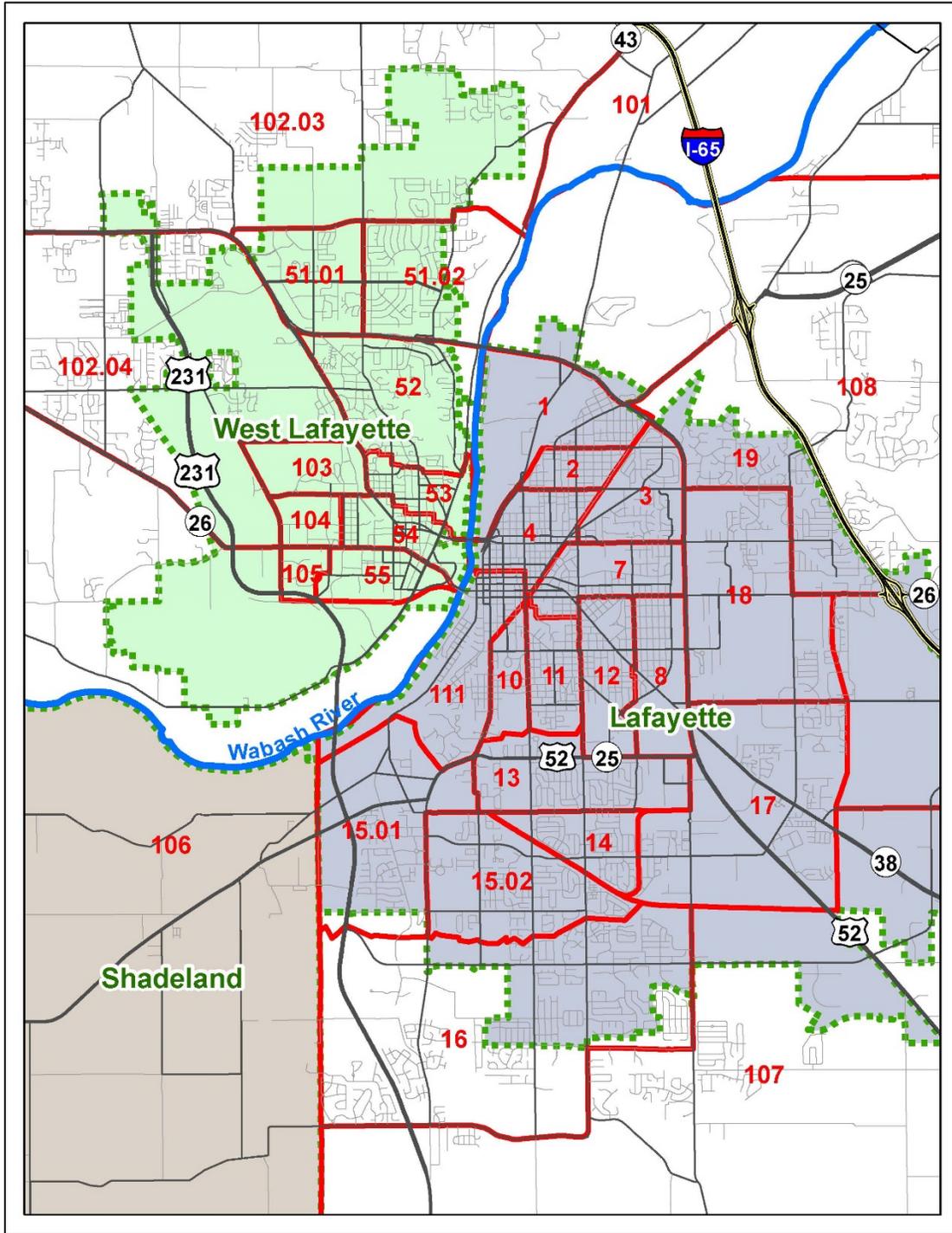
### **US Department of Housing and Urban Development and US Postal Service Data**

Since 2005 the US Department of Housing and Urban Development (HUD) and the US Postal Service (USPS) have jointly produced quarterly reports of mailing address vacancies by Census Tract for residential and non-residential properties. This data is made available to local governments by request and does not discriminate between owner-occupied and rental units.

The USPS mail carriers who collect the data, while not capturing vacancy data for all units in a tract, have collected a large enough sample of units in each tract that the results can reasonably be relied upon to identify trends or patterns for the entire tract. For the following analysis, we have only made use of the residential unit vacancy data for the years 2015 through the second quarter of 2019.

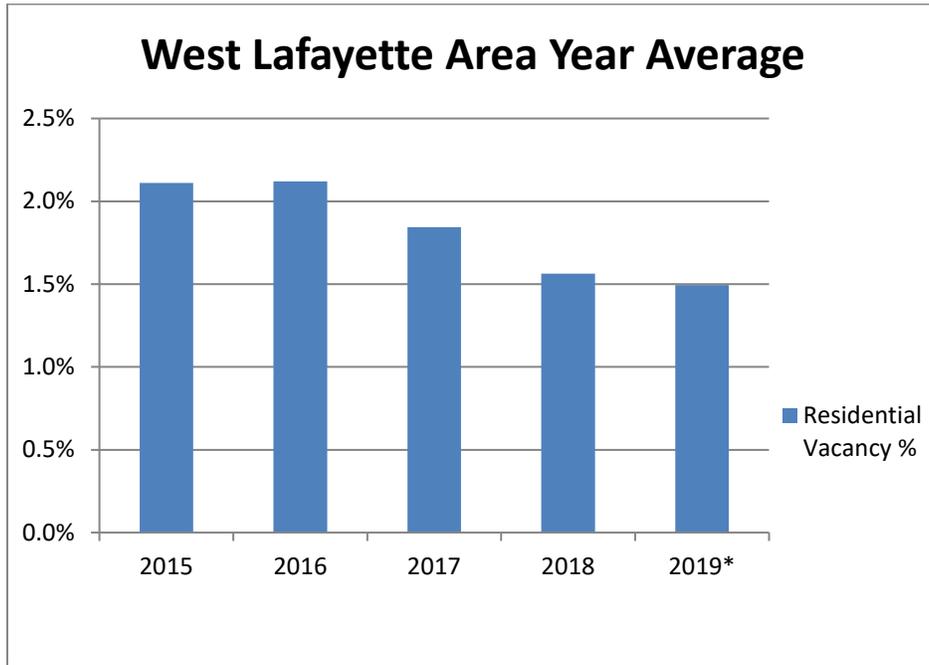
As shown in Figure 4, the “West Lafayette Area” includes the following Census Tracts: 51.01, 51.02, 52, 53, 54, 55, 102.03, 102.04, 103, 104, 105 and 106. The “Lafayette Area” includes these Census Tracts: 1, 2, 3, 4, 7, 8, 10, 11, 12, 13, 14, 15.01, 15.02, 16, 17, 18, 19, 108 and 111. Again, the vacancy data does not discriminate between a rental unit and an owner-occupied unit. Through our agreement with HUD, we can present the following findings (Figure 5) on residential vacancies in these tracts:

Figure 4 – Greater Lafayette Urban Area Census Tracts

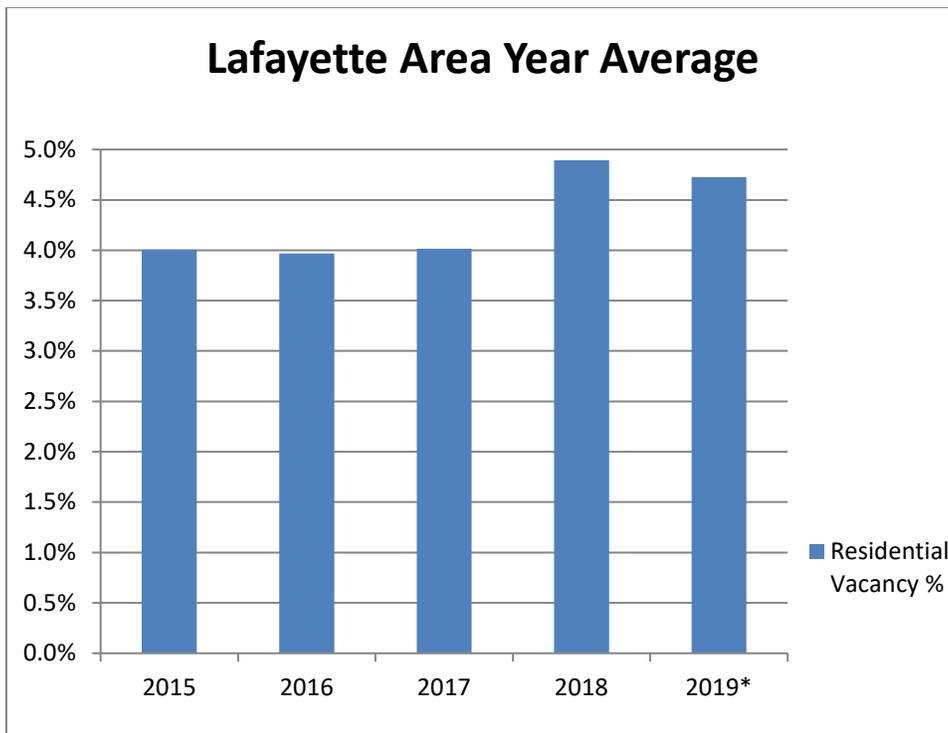


Source: US Bureau of the Census

**Figure 5 – West Lafayette Area Residential Vacancy Rates**



**Figure 6 – Lafayette Area Residential Vacancy Rates**



Sources for Figures 5 & 6: US Department of Housing & Urban Development

\*Represents the first and second quarter of 2019 only

As shown in Figure 5, over the last four-and-a-half years the West Lafayette Area has experienced on average an approximate 1.83% residential vacancy rate while in Figure 6 the Lafayette Area experienced on average a 4.32% residential vacancy rate (down from 2.02% for West Lafayette and up from 3.72% for Lafayette relative to last year's report). As with our past reports, these figures were calculated by averaging the quarterly data into single years and averaging the years (including the first two quarters of 2019).

Generally, there were no dramatic fluctuations in each area's vacancy rates over a four-and-a-half-year period, although it is notable that Lafayette's overall vacancy rate appears to have increased. The main difference between the two areas remains the relationship each area's core has with its periphery.

The urban periphery of the West Lafayette Area (which includes tracts 51.01, 51.02, 52, 102.03, 102.04 and 106) averaged (over a four-and-a-half-year period) 2.68% in residential vacancy (up from 2.53% last year's report) while the area's core tracts (53, 54, 55, 103, 104 and 105) had, on average, a 0.98% vacancy rate (down from 1.27% last year's report). Meanwhile in the Lafayette Area, the tracts in and near the urban core (1, 2, 3, 4, 7, 8, 10, 11, 12 and 111) have the highest four-and-a-half-year average vacancy rate at 6.57% (up from 6.54% last year's report), while the urban periphery of the Lafayette Area (tracts 13, 14, 15.01, 15.02, 16, 17, 18, 19 and 108) averaged 2.41% in residential vacancy (down from 2.55% last year's report).

So, the inverse relationship between the two cities, as it relates to residential vacancies, remains as was reported in our past analyses: Residential vacancies remain highest near Lafayette's urban core and lowest in its urban periphery while vacancies remain lowest in West Lafayette's urban core and highest in its urban periphery.

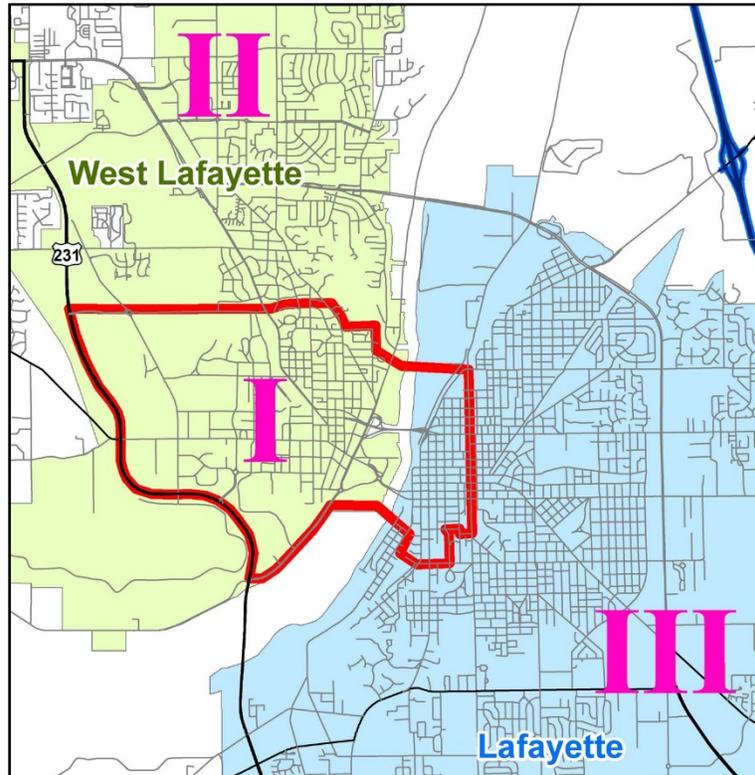
### 2019 Campus Area Landlord Survey

Over the summer months of 2019 the Area Plan Commission staff conducted a survey of off-campus landlords and management companies who manage rental units near Purdue's campus, those away from campus but primarily in West Lafayette, and those in areas of Lafayette that have traditionally housed Purdue students. The purpose was to augment the HUD/USPS vacancy data with firsthand information directly from the landlords and management companies about these rental units and complexes. The survey sought to verify total units and bedrooms, vacancy rates by unit and, if possible, by bedroom for the 2018-2019 school year (those units/bedrooms that remained vacant the entire school year). We also sought demographic information about the tenants, specifically whether they were students, non-student singles or families (which included both student and non-student family groups).

This year's survey reached out to 130 landlords and management companies. Our efforts resulted in 33 responding participants with 97 either declining to participate or not

responding. The respondents who chose to participate represented a wide spectrum of rental properties from large complexes to small single-family detached rental homes in both the urban cores and urban peripheries of both cities. In all, 162 properties were included in the survey compared with 109 properties in 2018's survey.

**Figure 7 – Campus Area Survey Extent**



In order to respect the confidentiality of the respondents, the precise location of their properties is not identified on the map.

Respondents' properties all lie within the map shown in Figure 7. The three areas, identified by the Roman numeral labels in Figure 7, include areas within and outside the C-permit "Commuter Permit Exclusion" boundary in the cities of West Lafayette and Lafayette.

Of the 162 properties surveyed, 86 are located within the C-permit boundary in the City of West Lafayette, 23 are located within the C-permit boundary in the City of Lafayette, 39 are located outside the C-permit boundary in or near the city limits of West Lafayette (west of the Wabash River) and 14 are located within the city limits of Lafayette, but outside of the C-permit boundary. Added together these properties contained 8,552 units and over 11,000 bedrooms (not every respondent provided bedroom data).

The results are now divided into three geographically defined categories:

- I. Of the 109 properties surveyed in the non-commuter C-permit “Commuter Permit Exclusion” (Area I) boundary:
  - There were 3,050 units.
  - On average, over the course of the 2018-2019 school year, approximately 0.79% of the total units remained vacant, up slightly from 0.60% reported in 2018.
  - The highest unit vacancy rate reported for a property was 7.59% in Area I. This West Lafayette property contained a large, multi-unit, multi-family building.
  - Generally, 2 and 4-bedroom units leased the slowest, while studios and 1-bedroom units leased the fastest.
  
- II. Of the 39 West Lafayette Area properties surveyed in the commuter area outside the C-permit “Commuter Permit Exclusion” (Area II) boundary:
  - There were 4,668 units.
  - On average, over the course of the 2018-2019 school year, approximately 2.46% of the total units remained vacant, up from 1.37% reported in 2018.
  - The highest unit vacancy rate reported for a property was 19.84%. The property contained multiple, low-rise multi-family buildings.
  - Generally, 2 and 4-bedroom units leased the slowest, while studios and 1-bedroom units leased the fastest.
  
- III. Of the 14 Lafayette area properties surveyed in the commuter area outside the C-permit “Commuter Permit Exclusion” (Area III) boundary:
  - There were 834 units.
  - On average, over the course of the 2018-2019 school year, approximately 0.96% of the total units remained vacant, up from zero reported in 2018.
  - The highest unit vacancy rate reported for a property was 5.83%. The property contained multiple, low-rise multi-family buildings.
  - Generally, 2-bedroom units leased the slowest, while studios and 1-bedroom units leased the fastest.

## **PART 3: CONCLUSIONS & RECOMMENDATIONS**

### **Population Growth**

US Census estimates continue to show steady increases in the overall population of Tippecanoe County. The estimated 11.7% increase from 2010 to 2018 continues to highlight the stability and economic vitality of the community and its ability to attract growth. Purdue University's growth continues, with four straight years of record enrollment, including the most recent 4.4% increase in student population over the previous school year.

### **Residential Vacancies Overview**

As with previous reports' conclusions, no great fluctuations have occurred relative to the analysis of the USPS/HUD data. Residential unit vacancies generally remain higher near Lafayette's core and in the areas surrounding the C-permit "Commuter Permit Exclusion" boundary in West Lafayette. Conversely, the lowest residential unit vacancies in the community are found close to campus within the C-permit "Commuter Permit Exclusion" boundary and around the outer parts of Lafayette.

Relative to our own local survey data, we also didn't encounter any great deviations from the results of our previous reports. Residential unit vacancies generally remain higher in the areas surrounding the C-permit boundary in West Lafayette and around downtown Lafayette. Conversely, the lowest residential unit vacancies in the community are found within the C-permit boundary in West Lafayette and around the outer parts of Lafayette.

### **Residential Vacancies in West Lafayette**

From the West Lafayette Area's HUD/USPS data set, we reported a four-and-a-half-year average 1.83% residential vacancy rate (2.02% was reported last year). Along the urban periphery of the West Lafayette Area the residential vacancy rate increased to 2.68% (up from 2.53% a year ago). Meanwhile, within the urban core of the West Lafayette Area, the residential vacancy dropped to 0.98% (down notably from 1.27% a year ago).

Our survey results for West Lafayette demonstrated some similarities with the HUD/USPS data: A 0.79% vacancy rate was reported for the area inside the C-permit "Commuter Permit Exclusion" boundary (0.60% was reported in 2018) while a 2.46% vacancy rate was reported for the area outside of the C-permit boundary (notably up from 1.37% reported in 2018).

The conclusion to draw from the analysis of both data sets for the West Lafayette area remains similar to our past reports: Lower vacancies in the core areas (as opposed to the urban periphery) continue to support the responsible urban densification of the near-

campus area while discouraging dramatic increases in large, undergraduate-student-oriented, multi-family housing developments in the outlying areas of West Lafayette. The exception to multi-family expansion in the periphery continues to be units that cater to a mix of student and non-student groups and families which are adjacent and walkable to major commercial activity centers and public transit.

*Comprehensive Plan* support for this conclusion is found, in part, in some of the implementation strategies within the *New Chauncey Neighborhood Plan*:

- *“Goal 2 – Neighborhood Redevelopment – Objective 1, Strategy 2 – Focus all residential density along the Northwestern and Fowler corridors per the future land use map.”*
- *“Goal 2 – Neighborhood Redevelopment – Objective 3, Strategy 1 - Develop neighborhood plans for Chauncey Village, Hills & Dales and the neighborhood south of State Street.”*
- *“Goal 2 – Neighborhood Redevelopment – Objective 3, Strategy 2 – Direct urban density residential projects to primarily rental neighborhoods like Chauncey Village and the neighborhood south of State Street through land use planning, reduced parking ratios, on-street permit parking for residents, and the construction of public parking facilities.”*
- *“Goal 2 – Neighborhood Redevelopment – Objective 3, Strategy 3 - Analyze existing zoning districts and develop an Overlay Plan that respects the Land Use Plan and provides specific direction for development to the appropriate areas within the New Chauncey Neighborhood.”*

### Residential Vacancies in the Lafayette Area

As with our previous reports, the HUD/USPS data continues to report residential vacancies in Lafayette being highest in and around the downtown core. The four-and-half year average residential vacancy rate increased slightly to 6.57% (from 6.54% reported last year). Beyond this core area, the city’s outlying Census tracts reported a four-and-half year vacancy rate average of 2.41% (down slightly from 2.55% reported last year).

Our survey respondents in the Lafayette area this year were largely scattered in both the urban core and urban periphery areas of the city. Of the properties surveyed a vacancy rate of 0.96% was reported (up slightly from zero reported last year). Similar to last year, with a relatively small number of respondents, our results are likely not representative of the actual vacancy rate. For the purposes of this report’s conclusions, we continue to favor the HUD/USPS data results.

As with our previous reports’ conclusions, the Lafayette rental market continues to cater to a more diverse collection of groups than West Lafayette and it is that defining quality

which sets it apart from the West Lafayette Area. This difference should continue to be promoted in housing policy for the city; policy which the *Historic Centennial Neighborhood Plan* already supports in such strategies as Task 1 of Implementation Strategy 1 which calls for the promotion of “urban living” to non-student groups in core neighborhoods like Centennial.

### Looking to the Future

Dramatic changes in the student housing market have taken place in the near-campus neighborhoods since our first report. The well-established pattern of urban densification of the near-campus neighborhoods has given way to even larger projects centered on West Lafayette’s traditional central business district of Chauncey Village.

Looking ahead, it is important to note the following as new student-oriented rental and other multi-family projects are considered:

1. Purdue’s student population: The university’s record population growth over the past few years has been remarkable. With the 4.4% increase from 2017 to 2018 and the current 2.56% increase from 2018 to 2019 (44,551 total students), this growth will continue to present supply challenges for both on and off campus housing providers.
2. Purdue’s On-Campus Housing: With a low vacancy rate of 1.7%, the on-campus housing totals increased during the 2018-2019 school year from the previous year (from 13,364 to 14,213 bedspaces) due to Purdue expanding the leasing of privately-owned, off-campus student apartments. Presently in the on-campus housing construction pipeline are two projects scheduled to open in the fall of 2020 and containing a combined 1,300 bedspaces.
3. New multi-family projects:

In West Lafayette: The fall of 2019 has seen the greatest increase in multi-family units arguably in the city’s history, with a total of at least 1,188 units with 2,519 bedrooms entering the market. Projects in the near-campus and Purdue Research Park areas that are either completed, under construction, under review, or approved to submit construction plans include:

- 302 Vine Street “Hi-Vine” (completed): 73 units, 117 bedrooms
- Rise at Chauncey (completed): 300 units, 675 bedrooms
- The Hub on State (completed): 233 units, 608 bedrooms
- Wabash Landing Apartments II (completed): 115 units/bedrooms
- 202 S. Chauncey Avenue (completed): 56 units, 104 bedrooms

- Innovation Place Apartments “Aspire” (completed): 375 units, 835 bedrooms
- State Street Corner (under construction): 36 units, 96 bedrooms
- Fowler Avenue Apartments (under construction): 53 units, 65 bedrooms
- PURE Development Apartments (under construction): 252 units
- Continuum (under construction): 249 units, 332 bedrooms
- Evergreen Campus Rentals (approved): 48 units, 64 bedrooms
- 443 Vine Street (approved): 4 units, 12 bedrooms
- Provenance (approved): 550 units (mix of single-family and multi-family)

In Lafayette: Since the completion of the Marq (99 units, 122 bedrooms) in 2018, multi-family development continues in and near Lafayette’s downtown and its suburban areas. Other projects on the horizon in the city include:

- Union Place Apartments (completed): 40 units
- H38 Apartments (under construction): 32 units
- Overlook Pointe Apartments (under construction): 248 units
- Star City Crossing (under construction): 76 units
- Shenandoah Place (under construction): 52 units
- Nova Tower (under review): 77 units
- Union & 14<sup>th</sup> Street (under review): 20 units
- Redwood Apartments (approved): 173 units

(Note: The projects listed in both cities as “completed” were not part of the landlord survey due to not being open during the full 2018-2019 school year.)

### Guiding Policies & Recommendations

To best manage future growth and ensure that sound planning principles work in concert with market forces, applicable policies from the 2011 *Housing Element* of the *Tippecanoe County Comprehensive Plan*, found in Appendix A-1 of this report, should be respected along with the following recommendations:

1. Support the land use recommendations in the *New Chauncey Neighborhood Plan* and create land use plans for West Lafayette’s downtown (Chauncey Village and the Levee) and the neighborhood south of State Street.
2. Support the land use policies of the *US 231 Corridor Plan* and the upcoming *West Lafayette Downtown Plan* (currently under development).
3. Continue to support redevelopment efforts centered on West Lafayette’s downtown (Chauncey Village and Riverfront), along Northwestern Avenue (from State Street to Meridian Street), and the neighborhood south of State Street.

4. Require compelling data from developers that supports significant increases in student-oriented residential density, particularly along the fringe areas of the campus and West Lafayette city limits.
5. Prepare for the adaptive re-use of multi-family rental units built for students beyond the near-campus area.
6. Discourage the development of multi-family, residential developments on the urban fringe that are not along a transit route and not adjacent and walkable to a major commercial activity center.
7. Explore the creation of near-campus, municipal public parking facilities and investigate creating a residential parking permit program for the neighborhood south of State Street to increase parking efficiency and availability for residents while discouraging commuter students, faculty and staff from parking there.
8. Continually monitor Purdue's on-campus housing planning and construction efforts to ensure proposed off-campus residential development is in fact needed.

### Conclusion

Purdue's record student population growth continues to drive the demand for more student housing. Over the last few years, both the City of West Lafayette and Purdue University have responded to this demand by increasing their respective supplies of student-oriented, multi-family dwelling units. During the construction and completion of the first three high-rise projects (Rise on Chauncey, The Hub on State Street, and Campus Edge) the City of West Lafayette initiated a "pause" in new, large-scale, student-oriented residential units until such time as vacancy data could be obtained for these new projects. Over the course of the current 2019-2020 school year, staff will be able to obtain this data and we expect to present it in our next report.

In anticipation of next year's report, staff of the Area Plan Commission has nearly completed its master planning effort for West Lafayette's downtown. The *West Lafayette Downtown Plan* will likely be adopted in early 2020 and establish new ground rule development policies for the city's urban core that will shape future development. Until this downtown plan is adopted and the fundamentals impacting growth are demonstrated to be relatively unaffected by the recent surge in new multi-family stock, this report recommends the "pause" on major student-oriented projects continue.

## **PART 5: APPENDIX**

### **Appendix A-1: Policies of the Comprehensive Plan's Housing Element**

- *Policy 5 - In relation to established needs multi-family development should be encouraged on lands located near major activity centers.*
- *Policy 14 - Create land use plans that emphasize vibrant neighborhoods and support growth in Downtown Lafayette, the Levee area, and West Lafayette Village areas.*
- *Policy 23 - Significant new residential construction, regardless of density and configuration, is to be constructed only in the presence of, or in conjunction with, sufficient levels of public services, facilities, and all modes of transportation.*
- *Policy 24 - Housing specifically intended to serve low and moderate income and student populations is to be built within reasonable proximity to major shopping facilities and established public transportation routes.*
- *Policy 27 - Zoning and land use decisions regarding housing development and redevelopment shall be guided, in part, by adopted neighborhood plans. A neighborhood plan found to be outdated relative to the neighborhood's current situation shall be updated as APC staff resources allow. In developing neighborhood plans, staff shall encourage the active participation of neighborhood associations with all other property owners and residents. Continued development of neighborhood associations and property owner associations is strongly encouraged.*
- *Policy 28 - Zoning and land use decisions impacting neighborhoods rich in diversity, including those near Purdue University, shall consider all competing interests and promote an improved quality of life for all neighborhood residents.*

## Appendix A-2: The 2019 Landlord Survey

1. Please state the name of your apartment building/complex.
2. Please state the address of your complex.
3. Who is the owner of the building/complex?
4. How many years has the building/complex been leasing?
5. How many total units and bedrooms are in the building/complex?
6. Please provide a breakdown of unit type by number of bedrooms (x number of studios, x number of 1 bedrooms, x number 2 bedrooms, etc....)
7. Do you use one lease for the unit or one lease per bedroom?
8. What was the total number of lease signing adults in the complex?
9. How many units (or percentage of total units) were not leased during the 2018-2019 school year?
10. Of the unleased units, how many per unit type remained unleased during the 2018-2019 school year?
11. Was leasing more difficult than previous years? Did you have to lower price of apartments from last year to get more units occupied?
12. Approximately what percentage of your tenants are undergraduate college students, graduate college students, couples, young professionals, singles, other? If other, please name the group.
13. Of your rental unit inventory, which unit type leases up most quickly?
14. Which unit type leases most slowly?
15. Any additional comments or personal opinions?