



MEMORANDUM

DATE: January 16, 2009

TO: Transportation Commission

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Transportation Department
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SUBJECT: Transportation Management Program (TMP) Update Recommendation

Purpose

In response to Transportation Commission feedback provided at the November 13 meeting, staff will summarize the research we have conducted and the findings we have made related to the TMP Code update. Staff will seek a formal Transportation Commission recommendation for updating the TMP code at this meeting.

Background

In the Fall of 2007, staff initiated an evaluation of Transportation Management Programs (TMPs), a Transportation Code requirement that primarily affects property owners of large office buildings. This evaluation resulted in four potential alternatives (Attachment 1) to update elements of the TMP Code, which were discussed with stakeholders during several meetings, and presented during two public workshops in October 2008. A majority of City staff, TransManage staff, King County Metro staff, and members of the development and property management communities indicated TMP Alternative 4: Code Update + Menu of Options as the preferred alternative. On November 13, 2008 staff presented public workshop comments and recommended a preferred alternative (Alternative 4) for updating the TMP Code. Public comment during the November 13 Commission meeting suggested that TMP code amendments should include provisions that TMP conditioned developments be given an associated reduction or credit toward the development's imposed transportation impact fees pursuant to the idea that a development's trip generation should be less if the development is conditioned with and successfully implements an effective TMP.

Transportation Commission Feedback

In general, the Transportation Commission was supportive of the staff preferred "Menu of Options" alternative and the flexibility it would provide to developers relative to the other three options. However, in part due to the public input received, the Commission requested that staff consider a new, incentive-based approach for developers to implement a TMP, potentially acknowledging trip reductions assumed in a TMP when assessing a transportation impact fee.

Staff Analysis and Findings

In trying to establish the basis for making the connection between TMPs and Impact Fees, staff analyzed multiple data sources (discussed below), and found inadequate data to develop defensible conclusions regarding the level of PM peak commute trips that may be reduced at a given development with a building-wide trip reduction program.

To determine a defensible trip reduction factor for a TMP-affected development, it is necessary to understand the number of PM peak commute trips generated by developments of diverse land uses, sizes, and locations, before applying a reasonable trip reduction factor for each of those developments. Staff reviewed a range of local, state, and national data to determine the connection between TMPs and Impact Fees:

1. The Institute of Transportation Engineers (ITE) Trip Generation Manual (7th ed.) provides PM peak trip generations for diverse land uses and building sizes. Staff found that trips are not differentiated between commute, visitor, delivery, or any other type of trips. Thus, typical PM peak commute trips could not be determined and used as a baseline for TMP-related trip reductions.
2. Reduced trip rate calculations are used in the current City of Bellevue impact fee schedule (Attachment 2) for office developments located in downtown. Staff found that the trip reduction already accounts for higher HOV use in downtown, but the reduced trip rates are for all downtown office developments, including the larger TMP-affected development projects. Therefore, this trip reduction factor does not differentiate between TMP trip reductions and typical trip reductions assumed with a downtown location.
3. Staff reviewed Downtown and Citywide mode shares, commute trips, and parking demands from TMP and Commute Trip Reduction (CTR)-affected buildings, and buildings with CTR-affected tenants. Staff found that the first comprehensive mode share data was collected for TMP-affected buildings in 2005, so there is not currently enough data to understand how many commute trips might be reduced from the 2005 baseline at a TMP-affected building. At buildings solely or predominantly occupied by CTR-affected tenants there is a rich dataset to apply average commute trip reduction rates for Downtown and Citywide, however, CTR reports use a 6-9AM arrival time frame for tracking commute trips, and there is no data to determine how many of the afternoon commute trips occur at PM peak hour.
4. CTR calculations from Washington State Department of Transportation (WSDOT) provide guidance for determining how rideshare trips should be tallied in TMP and CTR data. Staff found that carpools and vanpools are assigned a fraction of a trip according to vehicle occupancy (i.e. a 2-person carpool counts as one-half of a trip per employee, a 3-person carpool counts as one-third of a trip, etc.). This calculation requires knowledge of carpool and vanpool usage rates and vehicle occupancies at TMP sites; but again, there is no determination on how many rideshare trips occur at PM peak hour.
5. Since no rideshare trips or occupancies are identified in TMP or CTR data, staff reviewed King County Metro's Rideshare Operations database for Downtown and Citywide average carpool and vanpool ridership, useful for determining rideshare trips with the CTR calculation above. Staff found average vanpool ridership data and

- I-405 carpool ridership data, and could determine how many rideshare trips are generated in a given area, but average vehicle occupancy would have to be assumed at a given site, and the rideshare data does not indicate PM peak trips.
6. The 2005 Mode Share Survey is the most current data available for comparing typical Downtown and Citywide mode shares to mode shares at TMP-affected buildings. Staff found that this comparison has little value because the mode shares at TMP-affected buildings are included in the calculation for typical area-wide mode shares. Also, the mode share survey targets employers, not buildings, so a TMP-affected building cannot be compared to a non-affected building as there is no data on non-affected buildings. Surveying and data analysis currently underway in the 2008 Mode Share Survey will determine changes at the 8 TMP-affected buildings surveyed in 2005, but will not provide data on which trip occur at PM peak hour.
 7. Staff reviewed Downtown and Citywide PM peak trips in Concurrency modeling, and found that the model inputs PM peak trips determined using the ITE trip generation manual and impact fee schedule. Therefore, PM peak commute trips could not be determined and used as a baseline for TMP-related trip reductions, nor could the model differentiate between TMP trip reductions and typical trip reductions, as for example, associated with a building being located in downtown.
 8. Evidence suggests that parking supply correlates with trip generation, so staff reviewed Downtown and Citywide parking requirements in the Land Use Code. Staff found that parking requirements were lower in Downtown, and the units of measurement used in parking requirements (Stalls per 1000 Square Feet) are closely associated with the units used in the ITE Trip Generation Manual (Trips per 1000 Square Feet). Parking requirements, however, do not differentiate between supply for commuters or visitors, so the requirements do not provide insight into how many trips would be attributable to commuters.
 9. Since local and state data did not indicate what portion of PM peak trips are commute trips, staff reviewed work trips-per-worker data from the 2001 National Household Travel Survey (NHTS). Staff found that the 2001 NHTS lists an average of 1.14 work trips-per-worker, but there is no indication what portion of those trips are PM peak commute trips.

Staff Considerations

Despite the lack of data to support a credible PM peak TMP trip reduction factor, staff considered different concepts to acknowledge the trip reductions of a TMP-affected development when assessing the development's transportation impact fee.

Concept A: TMP Performance Assurance Device

For properties subject to a TMP performance requirement, a performance assurance device could be required as a portion of the assessed transportation impact fee. The developer would be required to produce a traffic impact analysis for forecasting trips that included defensible data for determining drive-alone and carpool/vanpool PM peak commute trips, and then commit to a specified reduction from forecasted drive-alone PM peak commute trips. An upfront assurance device could hold developers more accountable for fulfilling TMP performance obligations, however:

- There would be a high burden on staff to meticulously monitor and enforce these agreements, and present budget realities do not allow the dedicated staff and funding required to make this feasible.
- There would be no direct control over the variable impact fee, resulting in a loss of potential revenue for TFP projects.

Concept B: Upfront TMP Trip Reduction

Staff could assume a trip reduction for all TMP-affected developments, resulting in an associated reduction in impact fees. Since existing data is not adequate to document a specific PM peak TMP trip reduction, staff may propose an assumed trip reduction for all TMP-affected development depending on the location, land use, and size of the development. For example, a TMP-affected development in Bel-Red could be assumed to reduce 5 percent of PM peak trips, whereas a downtown development could be assumed to reduce 10 percent of PM peak trips because of better transit service and higher parking costs in downtown. However:

- Any trip reduction assumptions would be highly speculative as there is insufficient existing data to accurately determine credible PM peak trip reductions due to a TMP.
- The resulting impact fee reduction would essentially be a give-away to TMP-affected development, particularly for short-term property owners.
- Despite the effective give-away, developers may challenge the assumed trip reduction which could result in further losses of potential impact fees.
- There could be a substantial loss of potential funding for transportation projects since the number of TMP-affected developments has increased sharply in recent years.

After discussing the costs and benefits of these concepts in several meetings, staff consider both to be inadequate given the realities of a constrained budget for administration, the lack of accountability, and the potential impact to essential transportation facilities.

Staff Conclusion

At any time during the impact fee assessment, a developer may propose a modification, and staff may approve on a case-by-case basis. A proposal to modify the impact fee assessment to account for trip reductions of a TMP is allowable under existing and proposed Transportation Management Program (TMP) code (BCC 14.60.070.H) and existing Transportation Impact Fee code (BCC 22.16.080.C and I):

14.60.070.H. Substitution of Alternate Program. With the approval of the director, an alternate transportation management program may be substituted by the property owner if, in the judgment of the director, the alternate program is at least equal in potential benefits to the requirements

22.16.080.C.The transportation department shall be authorized to adjust the impact fees for any mixed development based on analysis of specific trip generating characteristics of the development.

22.16.080.I. The transportation department may consider unusual circumstances for specific developments and may adjust the standard impact fee for specific developments in order to ensure that impact fees are imposed fairly. The department shall set forth its reasons for adjusting the impact fee in written findings.

If a developer is not satisfied by a staff assessment, he/she may appeal and a decision will be made by the Hearings Examiner (BCC 22.16.095).

22.16.095 Appeal of fees.

The developer may appeal the determination of the amount of the transportation impact fee, including whether or to what extent an exemption applies or a credit should be provided. The developer must file an appeal with the city clerk within 14 days of the date that notice is given to the developer of the fee. The appeal shall be processed pursuant to the Process II appeal procedures of the LUC 20.35.250. Pending determination on any appeal, a building permit may only be issued if the developer first pays under protest the full amount of the fee, as determined by the department. (Ord. 4978 § 33, 1997; Ord. 4824 § 8, 1995.)

The language in existing and proposed TMP and Impact Fee codes offers a simplified solution to the Transportation Commission's request, without requiring dedicated funding and staffing to monitor and enforce, without relying on inadequate data, and without presenting a substantial threat to transportation facility funding.

In conclusion, stakeholder comments lead staff to believe that TMP Alternative 4 is much more of an incentive-based approach for developers than existing code. Alternative 4 allows developers who have multiple TMP-affected buildings in the region to implement one program at all of their properties, or to tailor their programs to site conditions. Alternative 4 intentionally includes a number of program options that overlap with LEED certification requirements (Attachment 3), an increasingly desired certification in its own right and marketable to tenants. Alternative 4 also addresses lessons learned from over 20 years of administration, adopts a number of best practices, making TMP implementation more consistent regionally and nationally, and provides flexibility for the City and the property owner to enforce and ensure performance.

Next Steps

- Staff is seeking Commission endorsement of TMP Alternative 4 for Council consideration at this meeting.
- Staff anticipates requesting Council consideration for updating the TMP code in March or April.

Attachment 1 – TMP Alternatives

Alternative 1: No Action – This alternative proposes no code changes since the existing code addresses a majority of transportation impacts of current proposed development projects, and provides a trip reduction program to the estimated 15,000 new employees in these new developments.

Alternative 2: Code Update - This alternative includes minimum revisions based on lessons learned from over 20 years of TMP administration and recognition of evolving conditions in Bellevue. Revisions include:

- Consistent Citywide requirements (eliminating enhanced downtown-only requirements)
- Financial incentive for each non-drive-alone commuter equivalent to 20 percent of building's monthly parking rate
- Performance goal of 20 percent drive-alone reduction, with specific 2-year targets

Alternative 3: Code Update + Best Practices - This alternative would incorporate all of the proposed code modifications in Alternative 2, and many best practices, including incentivizing TMA membership, shower and locker requirements for bicyclists and pedestrians, and adjusting requirements based on performance.

Alternative 4: Code Update + Menu of Options – This alternative includes proposed code modifications in Alternative 2 and a point-based system incorporating best practices, where each property owner is required (based on property size and land use) to reach a designated amount of points (Table 1), which are earned by choosing to implement a menu of TMP elements (Table 2). TMP elements are given an assigned value that, when implemented, are summed together to meet the required number of points. Base requirements include posting commuter information, distributing information annually, designating a Transportation Coordinator, and submitting biennial reports. The most points are given to TMA membership and incentives for non-drive-alone commuters. This system would allow property owners/developers flexibility to choose programmatic options that are most applicable to their specific development.

Table 1 shows the required number of additional points for each land use and property size, Table 2 shows the point distribution for each TMP element, and Table 3 illustrates point distributions for two different developments.

	Office & High Technology Light Industry	Mftng/ Assembly (other than High Tech)	Professional Services Medical Clinics & Other Health Care Services	Hospitals	Retail/ Mixed Retail/ Shopping Centers	Mixed Uses
TMP Base Requirements	30,000 gsf or over ¹	50,000 gsf or over	30,000 gsf or over	80,000 sf or over	60,000 sf or over	4
TMP Requirement	69 points for 50,000 gsf or over	45 points for 150,000 gsf or over	45 points for 50,000 gsf or over	45 points for 80,000 sf or over	45 points for 150,000 sf or over	4
If performance targets are attained	5 point reduction after biennial survey confirmation ²	N/A	N/A	N/A	N/A	4
If performance targets are not attained	Additional 5 points required with each biennial survey confirmation until improvement occurs or additional efforts demonstrate no improvement ³	N/A	N/A	N/A	N/A	4

¹ Base requirements include: Line item parking costs, Ridematching Service, Employee Survey, Performance Goal

² Point reductions shall not be below required base level points

³ No more than 88 points shall be required for any development

⁴ Requirements apply for the same or most similar land uses, as determined by the Director

Table 1 - Alternative 4: Point Requirements

The point distributions in Table 2 were determined by adding the scores of four different criteria: the financial and administrative burden to property owners, whether the TDM element provided or supported a non-drive-alone transportation option, and the relative amount of drive-alone reduction expected with each practice.

Building TDM Practice		Financial Burden ¹	Administrative Burden ²	Transportation Choices ³	Mode Shift Impacts ⁴	Points
Base Requirements	Post Information	Low	Low	Med	Low	5
	Distribute Information	n/a	Low	Med	Low	4
	Designate Transportation Coordinator	n/a	High	High	High	9
	Biennial Report	n/a	Med	n/a	n/a	2
	Line Item Parking Costs	n/a	Low	High	High	7
	Ridematching Service	n/a	Med	Med	Med	6
	Biennial Survey	n/a	Med	n/a	n/a	2
	Performance Goal	n/a	High	High	High	9
Point Options	Showers	High	High	High	Low	10
	Lockers	Med	Med	Med	Low	7
	Building or Campus-based Bikeshare or Bike Maintenance Program	Med	Med	High	Low	8
	Membership in a TMA maintaining an average client drive-alone rate equal to or less than the current area-wide average ⁵	n/a	High	High	High	18 ⁶
	Designate preferential carpool/vanpool parking for at least 1 space or 5% of spaces, whichever is greater	Low	Med	Med	Med	7
	Locate carshare vehicle onsite, and designate preferential carshare parking for at least 1 space	Med	Low	High	Low	7
	Provide shuttle service to/from transit center or designated park and ride	High	High	High	High	12
	Financial incentive for each designated non-drive-alone commuter	High	High	High	High	12
	Voluntary lease agreements for unsubsidized parking	n/a	Low	High	High	9
	Guaranteed Ride Home Program	n/a	Med	Med	Med	6

Scoring Criteria: Low=1 point, Med=2 points, High=3 points

¹ Capital costs of property owners

² Operational and Maintenance costs of property owners

³ Score based on provision and support of a non-drive-alone mode

⁴ Score based on expected building-wide changes in drive-alone behavior

⁵ Or current area-wide target as determined by the director

⁶ Score is weighted to account for TMA services that reduce property owners' administrative burdens of: updating posted information, information distribution, designating a transportation coordinator, surveying and reporting, attaining performance goals,

Table 2 - Alternative 4: Point Distribution

The following examples illustrate the points that would likely be earned by an office development both in and outside of downtown. The downtown development has the option of joining the TMA, whereas the Bel-Red development does not.

		Points	Example		Example	
			300,000 sf Downtown Office Building	69 points required	300,000 sf Bel-Red Office Building	69 points required
Base Requirements	Post Information	5	x		x	
	Distribute Information	4	x		x	
	Designate Transportation Coordinator	9	x		x	
	Biennial Report	2	x		x	
	Line Item Parking Costs	7	x		x	
	Ridematching Service	6	x		x	
	Biennial Survey	2	x		x	
	Performance Goal	9	x	44 Points	x	44 Points
	Showers	10			x	
Point Options	Lockers	7			x	
	Building or Campus-based Bikeshare or Bike Maintenance Program	8			x	
	Membership in a TMA maintaining an average client drive-alone rate equal to or less than the current area-wide average ⁵	18 ⁶	x			
	Designate preferential carpool/vanpool parking for at least 1 space or 5% of spaces, whichever is greater	7	x			
	Locate carshare vehicle onsite, and designate preferential carshare parking for at least 1 space	7				
	Provide shuttle service to/from transit center or designated park and ride	12				
	Minimum 2 Free Park days/mo. financial incentive for each designated non-drive-alone commuter	12				
	Voluntary lease agreements for unsubsidized parking	9				
	Guaranteed Ride Home Program	6				
			Total Points	69	Total Points	69

Table 3 – Alternative 4: Example

Attachment 2 – Current Transportation Impact Fee Schedule (subject to amendment)

TRIP GENERATION RATES					
LAND USE	UNITS	P.M. PEAK	NEW TRIPS	REDUCED	TRIP LENGTH
		TRIPS/UNIT	%	TRIP RATE	
Single Family	DWELLING	1.01	100	1.01	3.5
Multi-family	DWELLING	0.51	100	0.51	3.7
Multifamily (D)	DWELLING	0.38	100	0.38	3.7
Senior Citizen Dwelling	OCC. DWELL.	0.11	100	0.11	2.8
Senior Citizen Dwelling (D)	OCC. DWELL.	0.11	100	0.11	2.8
Nursing Home	BED	0.22	100	0.22	2.8
Congregate Care/Assisted Living	OCC. DWELL.	0.17	100	0.17	2.8
Hotel/Motel	OCC. ROOM	0.65	80	0.52	4.0
Hotel/Motel (D)	OCC. ROOM	0.49	80	0.39	5.1
Bank/S&L wo Window	1000 GSF	33.15	60	19.89	2.9
Bank/S&L w Window	1000 GSF	45.74	55	25.16	2.9
Day Care Center (exempt)	1000 GSF	13.18	75	9.89	2.0
Service Station	VFP	13.86	50	6.93	1.7
Service Station w Convenience Mkt	VFP	13.38	45	6.02	1.7
Convenience Market	1000 GSF	52.41	40	20.96	1.3
Convenience Mkt w Gas Pumps	1000 GSF	60.61	35	21.21	1.3
Movie Theater w/Matinee	SCREEN	44.53	85	37.85	2.3
Car Wash - Self Service	STALL	5.54	65	3.60	1.6
Medical Clinic	DOCTOR	3.78	75	2.84	4.8
Medical/Dental Office	1000 GSF	3.72	75	2.79	4.8
Hospital (non-profit exempt)	1000 GSF	1.18	80	0.94	5.0
Elementary School	STUDENT	0.01	100	0.01	3.7
High School	STUDENT	0.14	100	0.14	3.7
Junior College	STUDENT	0.12	100	0.12	3.7
Religious Institution	1000 GSF	0.66	100	0.66	3.7
Quality Restaurant	1000 GSF	7.49	65	4.87	3.4
High Turnover Restaurant	1000 GSF	10.92	65	7.10	2.3
Fast Food Restaurant w window	1000 GSF	34.64	50	17.32	2.0
Fast Food Restaurant wo Window	1000 GSF	26.15	50	13.08	2.0
Shopping Center 0 - 9999	1000 GLSF	14.24	40	5.70	1.3
Shopping Center 10,000 - 49,999	1000 GLSF	9.43	45	4.26	1.5
Shopping Center 50,000 - 99,999	1000 GLSF	6.90	60	4.15	1.5
Shopping Center 100,000 - 199,999	1000 GLSF	5.45	65	3.56	1.7
Shopping Center 200,000 - 299,999	1000 GLSF	4.58	70	3.22	1.7
Shopping Center 300,000 - 399,999	1000 GLSF	4.09	70	2.87	2.1
Shopping Center 400,000 - 499,999	1000 GLSF	3.75	75	2.83	2.4
Shopping Center 500,000+	1000 GLSF	3.51	75	2.64	3.2
Supermarket	1000 GSF	10.45	70	7.32	2.1
Discount Supermarket	1000 GSF	8.90	70	6.23	2.1
Discount Store	1000 GSF	5.06	80	4.05	1.7
Discount Superstore	1000 GSF	3.87	75	2.90	1.7
Miscellaneous Retail	1000 GSF	4.80	50	2.40	1.7
Retail Warehouse (Hardware)	1000 GSF	2.45	60	1.47	3.2
Retail Warehouse (Gen.Merch.)	1000 GSF	4.24	70	2.97	3.2
Furniture Store	1000 GSF	0.46	50	0.23	1.7
Car Sales - New/Used	1000 GSF	2.64	80	2.11	4.6
Office 0 - 9999	1000 GSF	4.09	90	3.68	5.1
Office 0 - 9999 (D)	1000 GSF	3.07	90	2.76	5.1
Office 10,000 - 49,999	1000 GSF	2.55	90	2.30	5.1
Office 10,000 - 49,999 (D)	1000 GSF	1.91	90	1.72	5.1
Office 50,000 - 99,999	1000 GSF	2.00	90	1.80	5.1
Office 50,000 - 99,999 (D)	1000 GSF	1.50	90	1.35	5.1
Office 100,000 - 199,999	1000 GSF	1.65	90	1.49	5.1
Office 100,000 - 199,999 (D)	1000 GSF	1.24	90	1.12	5.1
Office 200,000 - 299,999	1000 GSF	1.44	90	1.30	5.1
Office 200,000 - 299,999 (D)	1000 GSF	1.08	90	0.97	5.1
Office 300,000+	1000 GSF	1.39	90	1.25	5.1
Office 300,000+ (D)	1000 GSF	1.04	90	0.94	5.1
Light Industry/Manufacturing	1000 GSF	0.98	100	0.98	5.1
Industrial Park	1000 GSF	0.86	100	0.86	5.1
Warehousing/Storage	1000 GSF	0.47	100	0.47	5.1
Mini-Warehouse	1000 GSF	0.26	100	0.26	5.1

Attachment 3 – Overlap between TMP Alternative Elements and LEED Certification Requirements

TMP Element		Alternative 1: No Action	Alternative 2: Code Update	Alternative 3: Code Update + Best Practices	Alternative 4: Code Update + Menu of Options
Current TMP code	Post information	x	x	x	x
	Distribute information	x	x	x	x
	Designate Transportation Coordinator	x	x	x	x
	Preferential parking	x	x	x	O
	Financial Incentive	x	x	x	O
	Guaranteed Ride Home Program	x	x	x	O
	Leases stating line item parking cost	x	x	x	x
	Ridematching Service	x	x	x	x
	<u>Performance Goal</u>	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>
	<u>10% reduction</u>	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>
	<u>25% reduction</u>	<u>x</u>			
	<u>50% reduction</u>				
	<u>75% reduction</u>				
	Best Practices	Survey	x	x	x
Report		x	x	x	x
Implementation plan earlier			x	x	x
TMA membership				O	O
Bike Commuter Parking			x	x	x
Building or Campus-based Bikeshare or Bike Maintenance Program				x	O
Showers				x	O
Lockers				x	O
Posted on site activities with contact info			x	x	x
2 year performance goals			x	x	x
Credit towards goal				O	
Adjust requirements according to performance				x	x
Record Implementation plan			x	x	x
Notice of ownership change			x	x	x
Additional Elements	Shared use of facilities		O	O	O
	Provide shuttle service				O
	Locate Carshare vehicle on-site				O
	Provide Carshare membership				O
	Cost of short term (daily) parking less than long term (monthly) parking¹⁰				O
	Voluntary Lease Agreements for Unsubsidized parking				O
	<u>LEED certified building (NC or CS)</u>				O
<u>Parking not exceeding minimum req'd by zoning</u>					O
<u>TDM program to reduce weekday pk trips by 20% compared to forecasted trips</u>					O
<u>Provide 50% subsidized transit passes for 3 years</u>					O
<u>Amount of TMP elements that overlap with LEED certification</u>		<u>up to 13%</u>	<u>up to 15%</u>	<u>up to 15%</u>	<u>up to 15%</u>
<u>Amount of TMP elements that overlap with LEED certification for commercial tenants</u>		<u>up to 17%</u>	<u>up to 19%</u>	<u>up to 19%</u>	<u>up to 19%</u>
<p>KEY: x - Required, O - Optional <u>Blue underlined</u> and Red Struckthrough items indicate modifications that have been made since public commenting on 10/28/08.</p>					