



Land Use Committee Report

City of Newton

In City Council

Tuesday, November 29, 2016

Present: Councilors Laredo (Chair), Schwartz, Lennon, Lipof, Crossley, Auchincloss, Harney, Cote; also present: Councilors Leary, Fuller, Norton, Baker, Yates, Brousal-Glaser.

City Staff Present: Chief Planner Alexandra Ananth, Deputy City Solicitor Ouida Young, Associate City Solicitor Bob Waddick

Planning & Development Board present: Peter Doeringer, Jonathan Yeo.

#180-16 (2) MARK NEWTONVILLE, LLC petition for a change of zone to Mixed Use 4 for land located at 22 Washington Terrace, 16-18 Washington Terrace, 10-12 Washington Terrace, 6-8 Washington Terrace, 875 Washington Street, 869 Washington Street, 867 Washington Street, 861-865 Washington Street, 857-859 Washington Street, 845-855 Washington Street, 245-261 Walnut Street (a/k/a 835-843 Washington Street), 241 Walnut Street, 22 Bailey Place, 14-18 Bailey Place, and an unnumbered lot on Bailey Place, also identified as Section 21, Block 29, Lots 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 19A, 20, 21, 22, and 23, Ward 2, currently zoned Business 1, Business 2, and Public Use, further described as follows:

Beginning at a point on the northerly line of Washington Street, running thence;

Along the northerly line of Washington Street, south 89 degrees - 04 minutes - 40 seconds west, a distance of 433.14 feet to a point; thence

Along the easterly line of Washington Terrace north 02 degrees - 03 minutes - 34 seconds west, a distance of 278.34 feet to a point, thence, the following four (4) courses along the existing zone lines of MR-1 and MR-3:

North 86 degrees - 11 minutes - 41 seconds west, a distance of 15.07 feet to a point; thence

North 01 degrees - 52 minutes - 35 seconds west, a distance of 3.01 feet to a point; thence

South 86 degrees - 11 minutes - 41 seconds east, a distance of 85.43 feet to a point; thence

North 88 degrees - 31 minutes - 34 seconds east, a distance of 370.56 feet to a point on the westerly line of Walnut Street; thence

Along the westerly line of Walnut Street, south 04 degrees - 12 minutes - 48 seconds east, a distance of 261.82 feet to a point of curvature; thence

Along a curve to the right having a radius of 17.00 feet, a central angle of 93 degrees - 17 minutes - 28 seconds, an arc length of 27.68 feet, a chord bearing of south 42 degrees - 25 minutes - 56 seconds west, a chord length of 24.72 feet to the point and place of beginning.

Containing 123,765 square feet, or 2.84 acres, more or less.

#179-16

Special Permit Petition for Orr Building at Walnut St. and Washington St.

MARK NEWTONVILLE,LLC petition for SPECIAL PERMIT/SITE PLAN APPROVAL to construct a mixed use, transit oriented development in excess of 20,000 sq. ft. consisting of three interconnected buildings with building heights of 60 feet and five stories, total gross floor area of 238,075 sq. ft., incorporating 171 residential units, approximately 39,745 sq. ft. of commercial space to permit office use, medical use, retail and personal establishment of more than 5,000 sq. ft., eating and drinking establishments of more than 5,000 sq. ft. retail banking and financial services and health club establishments, and approximately 2,030 sq. ft., of office/community space; 346 on-site parking stalls within a below-grade garage and surface parking, and to allow an FAR of 1.92; waive the setback and façade transparency, waiver of 97 parking stalls and dimensional requirements for parking stalls, interior landscaping, lighting, curbing, wheel stops, guard rails and bollards, waive entrance and end stall maneuvering space requirements, waive number of signs and allow for free-standing signs and loading bay at 241-261 Walnut Street, 845-875 Washington Street, 0-22 Bailey Place, 6-22 Washington Terrace, Ward 2, Newtonville, on land known as SBL 21029 0010, 21029 0011, 21029 0012, 21029 0017, 21029 0016, 21029 0018, 21029 0019, 21029 0019A, 21029 0013, 21029 0014, 21029 0015, 21029 0020, 21029 0021, 21029 0022, 21029 0023, containing approximately 123,956 sq. ft. of land in a district zoned BUSINESS USE 1 and BUSINESS USE 2. Ref:7.3.3, 7.4, 4.2.3, 4.2.5.A.2, 4.2.5.A.4.c, 4.2.5.A.4, 4.2.5.A.6.a, 4.2.5.A.6, 4.2.5.A.6.b, 4.2.5.A.6, 4.4.1, 5.1.4.A, 5.1.4.C, 5.1.4, 5.1.13, 5.1.8.A.2, 5.1.8.B.1, 5.1.8.B.2, 5.1.10.B.3, 5.1.8.B.6, 5.1.9.B, 5.1.10.A.1, 5.1.10.B.5, 5.1.12, 5.2.13 of Chapter 30 of the City of Newton Rev Zoning Ord, 2015.

Public Hearing Opened on June 7, 2016 and continued to July 12, September 13, October 6, 2016, November 1, 2016 and November 29, 2016.

Land Use Held 8-0.

Note: Chief Planner for the City's Planning Department, Alexandra Ananth summarized Traffic Impact Analysis and Mitigation for the proposal to rezone and redevelop the Orr Block. The Planning Department believes that the petitioner has worked to incorporate feedback from the Council, Planning Department, public and the Urban Design Commission.

Ms. Ananth noted that the current site of the proposal is currently underutilized and fails to generate pedestrian activity or contributing to Newtonville significantly. She noted that the petitioner's intent is to connect the site of the proposed development to the rest of Newtonville by using ground floor commercial space; including retail and dining options, locating single floor and two bedroom units to increase housing options for Newton residents and offering streetscape enhancements, contextual architecture and a plaza for community gathering.

Ms. Ananth stated that the petitioner has designed the first story to meet MU4 district purposes, including an active pedestrian oriented streetscape and approximately 40,000 sq. ft. of commercial space. The petitioner proposes to use precast concrete trims and bases in addition to a

metal storefront window to help activate the streetscape. Additional paneling and siding will also be used to add depth to the façade.

The Urban Design Commission has reviewed the design and has found that the petitioner has designed to address previous concerns including; breaking up the massing as it nears residences and on Walnut Street, creating of a pedestrian connection from Walnut Street to the inside plaza and creating a division between the commercial and residential space.

Ms. Ananth addressed a question previously asked by Committee members regarding whether the height of the proposal is appropriate based on the width of the street. She noted that from a planning perspective, a 1:1 ratio is acceptable for the street to building height ratio for a comfortable pedestrian experience. Washington Street is 80' wide and Walnut Street is 60', as the tallest parts of the proposal are 60', the Planning Department is not concerned that the height will be too great. Ms. Ananth noted that the fifth story setback varies and height at the corner allows for additional architectural details.

Ms. Ananth reviewed changes to the petitioner's plans including the removal of "wing buildings" on Washington Terrace away from the Foster Street residents and removal of the fifth floor on some buildings.

The City's peer reviewer for the traffic study reviewed the methodology and assumptions used in the TIAS and confirmed that the traffic study conforms to industry standards and best engineering practices. The study reviewed the proposed mitigation of the new traffic signal and pedestrian improvements and confirmed the analysis that the proposed mitigation will improve conditions with this project.

Ms. Ananth stated that the applicant is working on a Transportation Demand Management Plan and that the Planning Department has encouraged them to incorporate different options and incentives focusing on ridesharing, walking, biking and other alternatives to driving. It is anticipated that the petitioner will include parking decoupled from rent, subsidized transit passes, provisions for electric charging stations, a bike share station, contributions towards the bike share program and submission of annual surveys to measure the effectiveness of the Transportation Demand Management program. Streetscape improvements proposed also include; the restriping of the Walnut Street southbound to allow for two travel lanes, a bicycle lane and a parking lane, the reconstruction of the intersection and installation of new, ADA compliant traffic signals. Ms. Ananth noted that a Department of Public Works staff person will be at the next meeting to discuss proposed streetscape improvements.

Ms. Ananth reviewed criteria for consideration for the rezoning the site to MU4, noting that the proposed zone change should promote the public welfare and be consistent with the City's Comprehensive Plan and the Council's vision for the area. She stated that the MU4 district was created to allow for sufficient density and use for the creation of a lively environment, pedestrian oriented villages and reduced auto dependency.

Ms. Ananth provided a comparison (attached) of the BU2 which the site is currently zoned and MU4 districts as requested by Committee members at previous meetings. She noted that while both zones allow for the same uses, the difference is in the maximum number of units allowable on site. Because the lot area per unit requirement in the MU4 district is lower, a greater number of units can be allowed.

The site has been identified as a priority site in the City's Housing strategy. The Planning Department believes that the request to rezone the site to MU4 in the village center is consistent with the reasons that the zone was created for and supports the project. The Planning Department believes that the site's proximity to public transit options, the development will encourage alternative modes of transportation and provide access to Newtonville's amenities.

Attorney Buchbinder reviewed the previous plans presented by the petitioner; "Option A" a 4/5 story design with added rear mass, "Option B" a 4 story design and the original proposal which was a 4/5 story design. In response to feedback from Committee members and the public, the petitioner is proposing another option, "Option C" which incorporates details from the original proposal and "Option A". Atty. Buchbinder noted that the petitioner is also working with USPS representative Mr. Healy to resolve access/egress concerns.

Damian Chaviano, partner for the petitioner presented changes to the proposal and provided a comparative chart with details from previous plans (attached). He noted that the current proposal incorporates feedback from Foster Street abutters to push the massing away from Foster Street. The petitioner's plan is to maintain 25% of units as affordable, increase the Foster Street setback to the original 90' setback and eliminate the previously proposed wing buildings near Foster Street. In response to feedback from the Newtonville Area Council, the revised plans include a more pronounced fifth story corner at Washington Street and Walnut Street with an accent color and cap, a brick facade on Washington Terrace and details to better articulate the façade. The revised plans also include a fifth story with 7' setback. Materials to be used in the rear of the building are still being discussed.

Mr. Chaviano demonstrated the roof plans (attached) highlighting the areas of green space and possible PV ready locations. Mr. Chaviano reiterated the benefits to the site and proposed mitigation (attached) as a result of the proposal including the reduction in pedestrian crossing space with increased sidewalks and bumpouts, signalization upgrades, north and south Walnut Street bike lanes and canopy detail to allow for increased sidewalk width.

The petitioner hopes to use the community space in collaboration with the New Arts Center. The New Art Center would be responsible for programming the space and providing between 20 and 40 classes a week in addition to outreach programs. The programs will be available for the residents and the public.

The petitioner is committed to decoupling parking with rent, dedicated bike lanes on Washington Street and Walnut Street, on street bike parking and garage bike parking and is offering up to one million dollars towards improvements that could include funding for additional community

benefits like the transit subsidy pilot program. The transit subsidy pilot program would allocate \$300,000 for 3-5 years to reimburse residents transit costs. Households with no cars would be eligible for the \$200 cap, households with two or more cars would not be eligible for reimbursement and households with one car would be eligible for a percentage. Details of the transit subsidy pilot program are attached. Additional considerations could include bike lanes across the Walnut Street bridge, additional bike stations, pavers, lighting and trees on the east side of Walnut Street, bearing on utility lines on the south side of Washington Street. The petitioner has proposed I&I at the ratio of 8:1.

Public Hearing Commentary

State Representative Kay Kahn, 18 St. Marys Street, noted that one of her top priorities has been to repair of the three commuter rail stations in Newton. She was pleased to announce that the FY 2017-2021 CIP includes the Auburndale MBTA station to be redone and to be made accessible. She hopes to continue her work to the West Newton and Newtonville stations and believes that all 3 stations should be done simultaneously. She has been working with the Department of Transportation, the City and the developer to see if there are options to complete work on the three stations, even if it requires a private/public partnership. She believes that while it may take some time to see a change in service, the additional housing will be beneficial.

Dan Elias, Lincoln, Mass., Director for the New Art Center reiterated the petitioner's interest in collaborating with the center. Mr. Elias hopes to program daily classes and events for all ages . In addition, the New Art Center hopes to be able to offer programs for a broader audience including with some outreach programs. They hope to work with the petitioner to program wall art in public spaces and are excited about the opportunity to become more visible to the public.

Martin Healy, Northern Ave, Boston, Mass., Owner of the Newtonville Post Office and representing USPS noted that the post office has concerns about the impact of the increased traffic on Washington Terrace on the access and egress to the Post Office's loading purposes. They hope to have a resolution with the petitioner by December 15, 2016.

Pam Shufro, 20 Blithedale Street, feels that the project has great idea and suggestions, under current zoning. She noted that the density has remained the same throughout the project and the building is a box with a flat roof. She stated that data suggests that the City already has homes that are affordable for City employees and that the RKG data demonstrates a shortage in housing ownership. Ms. Shufro provided a summary of her findings which is attached.

Sarah Ecker, 68 Prospect Park, welcomes the proposed development and urges the Council to support it. She noted an excerpt from a Boston Globe article stating that the housing supply in the region is not keeping up with the demand. She supports the project because of the potential to activate the neighborhood and the potential to offer additional housing options to residents.

Paul, Temple Street, believes that the site of the proposed development is transit oriented. He believes that the opportunity for residents will include affordable housing, less environmental impact for

commuters who can take the train, easy access to the market, a City employee that can live an auto free lifestyle. He stated that this type of development is what the City needs.

Sherrill Kaplan, 192 Nehoiden Rd., is in school and anticipates looking for housing in Newton when she graduates. She noted that housing in Newton is not accommodating and believes that the development will offer better options.

Steven Cohen, Commonwealth Avenue, is in real estate development and is supportive of the project. He believes that the proposal is a great opportunity for the City. He believes it will help sustain the vitality of Newtonville businesses and offer more reasonably priced housing options.

Nancy Zollers, 154 Oliver Road, believes that the proposal is attractive and is in support of the project. She believes that people are supportive of the transit subsidies, bike lanes, affordable housing options and smart development.

Alison Conant, 68 Brookside Ave, is opposed to the size and scale of the development. She believes that the developer should make changes to comply with the current zoning at the site. She believes that the traffic impacts will be detrimental on Washington Street and feels that signalization improvements should be considered at the intersection of Washington Street and Lowell Street. Ms. Conant does not feel that this is a transit oriented development and has concerns about the Post Office access.

Rosalie Weiner, Brookline, Mass., does not believe that there are adequate affordable housing options in Newton and would like the opportunity to return to the City to live.

Chris Steele, 254 Eliot Street, Former Chair for the Economic Development Commission, is pleased to hear discussion about use of a MU4 district. He believes that the site can use transportation options and infrastructure to ensure that small businesses thrive in Newtonville.

Fred Gold, 69 Commonwealth Avenue, noted that traffic has always been bad in the area. He believes the decoupling of the parking spaces will encourage residents to take up street spaces would otherwise be used for commercial spaces. He believes that adequate parking should be contained on site and that it is unrealistic to anticipate that people will use alternative transportation options. He noted that there are significantly fewer affordable units than people interested in living in them.

Lynn Weisberg, 5 Alden St., is in favor of the project. She believes that the inclusion of additional 10% affordable housing units and larger units is noteworthy. Ms. Weisberg feels that the project and site are what the MU4 zone was designed to allow for.

Fran Godine, 19 Crofton Road, believes that the MU4 was forward thinking when it was created and feels that Washington Place is good execution of a project for an MU4 district. She noted that people are forced to leave Newton because of lack of housing options.

Mosa Abalard, Stoughton, Mass., would like to be able to move back to Newton in order for her son to enter the school system. She noted that there are limited affordable housing options and supports this project because of its potential to bring more.

John Pelletier, 92 Central Ave., Project Manager for Sustainable transportation at Harvard, supports the project and is pleased to see the recent changes to the project. He believes that the site is transit oriented because of the different transit options available at the site. He noted that the service should be extended but the demand must exist for the service to be extended. He added that TDM measures including the decoupling of cars from rent, bike sharing programs and transit subsidies have proven reductions in car usage.

Robin Polishook, 121 Forest St., gave testimony about her and her husband being hit by a car crossing Washington Street 3 years ago. She believes that there are major pedestrian management problems and that the project should address these issues.

Stephanie DeSantis, Watertown, Mass., supports the proposal because of the affordable housing options. She stated that she regrets signing a Facebook petition against the project because of the misinformation it gave.

Drew Rizuck, 26 Greylock Road, believes that MU4 district developments are good ways to bring communities together and supports the petition. Having moved from Dallas, TX he stated that the shops and transit options in Newtonville are what drew the family to the City.

Brendan Carrigan, 25 Kempton Place, son of owners of Barn Family Shoe Store, spoke on behalf of his family who support the project. Mr. Carrigan believes, as a future small business owner, that the project has a lot of potential and the family is excited to take advantage of the open layout and added visibility that the project offers.

Patrick D, 82 Oxford Road, Director of Brookline Housing Authority, believes that the project fits well with the City's MU4 concept and believes it should receive public and Council endorsement. He noted that the developer has been responsive to the Committee thorough analysis and feedback.

Rob Gifford, 41 Oxford Road, believes that this is a great project for Newtonville. He feels that the building design is well planned, that there are significant public benefits and that it will offer good affordable housing options.

Christine Greely, 31 Freeman Rd., is a historic preservationist responsible for analyzing the potential for positive economic change on various projects. Ms. Greely stated that young service professionals want to be able to live in the City but cannot currently afford to do so. She believes that the City should strive for diversity and inclusion and ensure that service professionals including; police officers, firefighters and teachers are able to live in the City.

Ed Daly, 67 Maplewood Avenue, former member of the Planning Board and Chair of the Inclusionary Zoning Board believes that the City has a shortage of affordable housing. He stated that the City remains short of their goal to provide for affordable housing and that the project will offer affordable

units in perpetuity. He noted that the development and small businesses can attract younger people and families with buying power.

William Aldrich, 1733 Commonwealth Ave, believes that traffic at the site is currently constrained and would like to see more transit options. He has concerns that the developments will impact the MBTAs ability to expand service.

Ellen Fitzpatrick, 20 Foster Street, feels that the public hearing should be organized to allow immediate abutters to speak first. She is pleased that the Planning Department has acknowledged that the site abuts a historic district. Ms. Fitzpatrick is still concerned about the height of the proposal and requested that renderings be created to demonstrate the nighttime view & lights from the Foster Street perspective.

Peter Harrington, 157 Lowell Avenue, does not believe that the project belongs at the site. He noted that the people who live in Newtonville do not like the scale of the project and stated that it will eliminate the tax base in the area. He believes that the City needs a clear plan to protect the City and restore taxes. Mr. Harrington added that a left turn onto Lowell from Washington Street is dangerous and that north bound traffic on Lowell is congested.

Kathleen Kouril Grieser, 258 Mill Street, stated that only the developer can benefit from the proposal and that the density has not changed throughout the iterations of the project. She stated that people are in support of in scale affordable housing but not in support of density. She believes that zoning exists to protect residents' investment and it is the Council's job to enforce the zoning. Mr. Kouril Grieser stated that the new development might force abutters to leave as the area changes. She added that the service costs to the City to build the development will be costly and will result in increased taxes.

Peter Bruce, 9 Claffin Place, believes that Washington Place will gentrify Newtonville. He believes that more than 25% of the development should be affordable housing and that the development should be created within current zoning.

To allow time for discussion from Committee members, the Chair ended public comment but noted that those who were not able to speak could speak first at the next public hearing.

Committee members agreed that the transit subsidy pilot program was a creative solution to encourage the use of alternative transportation options and would like the petitioner to continue to work on the plan.

Committee members expressed concern that the number of affordable units does not justify the rezoning at the site. It was requested that the petitioner increase the density at the site and increase the number of affordable units. Committee members also requested that the Planning Department provide a comparison of how much residential and commercial space would be allowable in a BU2 district. Councilors also expressed an interest in seeing smaller, more naturally affordable

units. Committee members shared concerns that the tax base at the site would not be adequate and that there should be a greater mix of uses.

Councilors were in support of the revised plans with mass pulled away from Foster Street and the fifth story details.

Committee members requested that the petitioner address potential plans at the intersection of Lowell and Washington Street and bike lanes on the Mass Pike and Washington Street. It was requested that the Planning Department review the option to have protected bike lanes. Councilors also reiterated the need for Public Works to provide feedback on the pedestrian experience and safety and intersection work. Committee members agreed that the previously discussed bridge renovations would not be pursued in lieu of other benefits.

Committee members requested that Planning provide a comparison of the costs to the City, proposed mitigation and analysis from Planning. It was requested that the Council Order be very specific in reflecting what the petitioner has committed to in addition to the proposed one million dollar allocation for community benefits.

All audio, presentations and submitted materials can be found on the City's website at the following link:

http://www.newtonma.gov/gov/aldermen/special_permits/special_permits_2016.asp

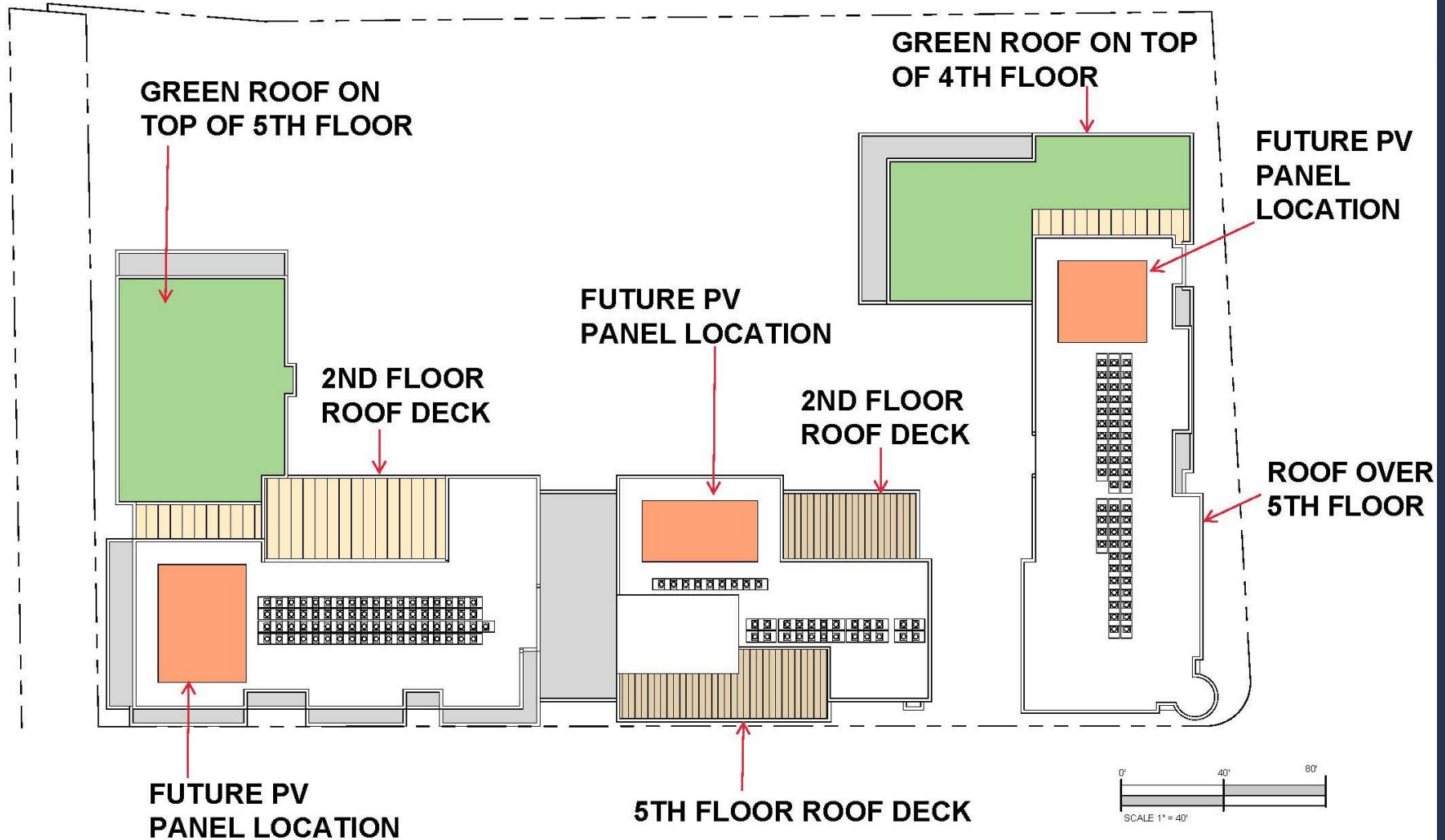
The Committee adjourned at 10:20 PM

Respectfully submitted,
Marc C. Laredo, Chair

Washington Place Revised Proposal

	Original Filing	Option A: 5/4 Stories	Option B: 4 Stories	Revised Proposal
Gross SF	238,075	228,915	228,915	226,875
# of Units	171	161	161	158 - 164
# / % Affordable	15% / 26	25% / 41	25% / 41	25% / 40 - 41
# of 3-Beds	0	6	6	6
Foster Street Setback (WT)	90'	45'	45'	90'
Foster Street Bump outs	0' / 0'	0' / 0'	72' / 34'	0' / 0'

Washington Terrace Roof Plan



Washington Place Transportation Pilot Program

Transit Subsidy Program	Affordable Units	Market Units
Monthly Stipend (Based on Usage)	Up to \$200	Up to \$200
0 Cars	100% of Stipend	100% of Stipend
1 Car	50% of Stipend	25% of Stipend
2 Car +	0% of Stipend	0% of Stipend

I applaud the patience of councilors on this issue. It has taken many months for the developer to make very modest concessions on the proposal. What is really shocking to Newtonville residents is that the developer does not budge at all on density. We still have a monstrous 5-story architecturally poor project.

However, I am here to speak about affordability. As you know, several speakers who FAVOR THIS PROPOSAL DO SO BECAUSE THEY THINK IT WILL BE AFFORDABLE. The question is: How affordable is it? The price of the rents: Studio c1800, 1 BR c 2500, 2 BR 3400 to 3700.

The project demolishes 22 existing affordable units. Originally it simply replaced those units with 26 affordables, netting us only 4 units at much-needed low-income levels. Later, Mr. Korrff did make what sounded like an important addition. He suggested 17 additional units of workforce housing, netting us 21 affordables. At first, this sounded appealing. Newton workers should be able to live in Newton. But, as it turns out, we already have reasonably priced units affordable for Newton workers. You know all those 2 and 3-family buildings we have in Newton. In fact, the supply is greater than the demand. According to RKG Associates (and I am presenting to you this chart), we have a surplus of units at 50 to 120 % AMI. People are living in them now, without a lottery ticket! The city paid for RKG to analyze Newton's housing needs. Let's not pretend these units don't exist. It's right here in black and white. What we need is affordable housing for people below 50% AMI.

And, btw, the RKG data DOES show that there is a severe shortage of OWNERSHIP HOUSING FOR NEWTON WORKERS...If this were a condo project for ownership housing...that would be a **positive** for Newton workers. But it's a rental.

So let's agree right now to NOT vote for this rental proposal as somehow meeting Newton's needs for affordable rental housing. The rents are going to be \$3400 or more for a 2 BR apartment. This project meets the developer's demands, it may meet the needs of wealthy people who want to live in an elevator building, but it does NOT meet the need for affordable housing in Newton.

If you do care about affordable housing, here is what would work: Maximum of 103 units, as allowed under BU zoning. 34 units affordable housing for low AMI residents. You will still get an elevator building for constituents who can afford it. It will look better, it will feel better, it is less intrusive on the neighborhood, and it will go a long way toward treating all residents fairly. Please vote NO on the current proposal. We can and must do better!

3.10 per sq ft.	Studio 550 sq ft.	\$1705.	Studio 585 sq ft.	\$1813.50
3.40 per sq ft.	Studio 550	\$1870	Studio 585	\$1989.00
3.10	1 BR 750	\$2325	1 BR 800	\$2480.00
3.40	1 BR 750	\$2550	1 BR 800	\$2720.00
3.40	1 BR 800	\$2720	1 BR 865	\$2941.00
3.10	2 BR 1100	\$3410	2 BR 1175	\$3642.50
3.40	2 BR 1100	\$3740	3 BR 1330	\$4522.00

Rental Affordability Thresholds Based on 2-Person HUD Income Limits
 Newton, Massachusetts

Threshold	Rental Units - Housing Supply		Housing Demand		Gap Analysis			
	Minimum Rent	Maximum Rent	Units	% of Units	Households Within Threshold	% of Households Within Threshold	Surplus/ (Shortage)	Supply as a % of Demand
Below 30%	\$0	\$565	994	13.9%	1,992	21.0%	(998)	49.9%
30% to 50%	\$566	\$941	349	4.9%	1,096	11.5%	(747)	31.8%
50% to 80%	\$942	\$1,355	1,167	16.3%	899	9.5%	268	129.8%
80% to 100%	\$1,356	\$1,883	2,326	32.5%	991	10.4%	1,335	234.7%
100% to 120%	\$1,884	\$2,259	781	10.9%	745	7.8%	36	104.8%
Over 120%	\$2,260		1,535	21.5%	3,784	39.8%	(2,249)	40.6%
Total			7,152	100.0%	9,507	100.0%	(2,355)	75.2%