

DOCKET ITEM #2

Special Use Permit #2011-0064**109 East Walnut Avenue**

Application	General Data	
Consideration of a request to construct a new single-family dwelling on a substandard lot.	Planning Commission Hearing:	November 1, 2011
	City Council Hearing:	November 12, 2011
Address: 109 East Walnut Avenue	Zone:	R2-5 / Single and Two-Family Residential
Applicant: East Walnut Street LLC by Stephen Kulinski, architect	Small Area Plan:	Potomac West

Staff Recommendation: APPROVAL subject to compliance with all applicable codes and ordinances and the recommended permit conditions found in Section III of this report.

Staff Reviewers: Nathan Randall nathan.randall@alexandriava.gov

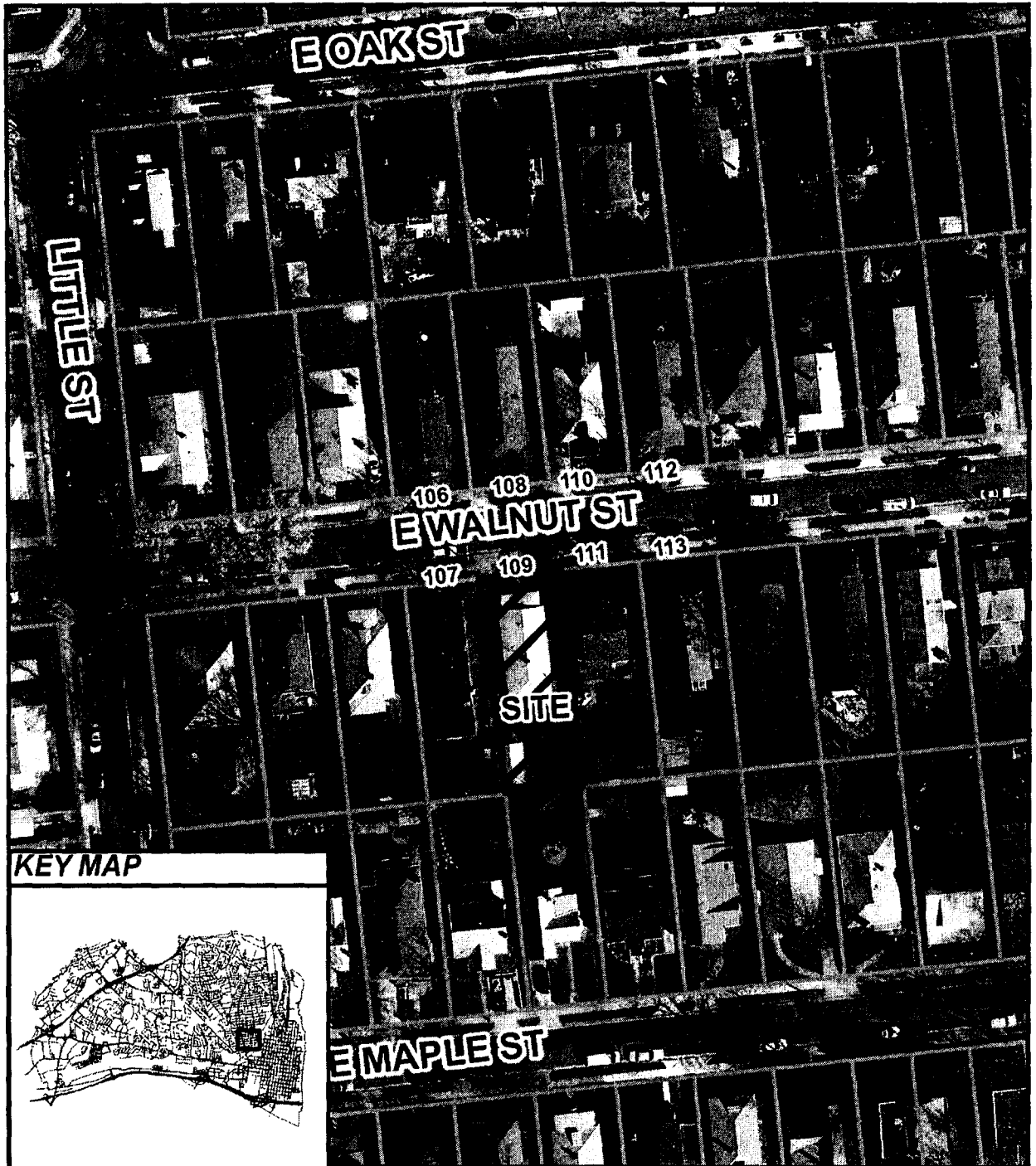
PLANNING COMMISSION ACTION, NOVEMBER 1, 2011: On a motion by Mr. Wagner, seconded by Mr. Robinson, the Planning Commission recommended approval of the request, subject to compliance with all applicable codes, ordinances and staff recommendations. The motion passed on a vote of 6 to 0. Mr. Komoroske was absent.

Reason: The Planning Commission agreed with the staff analysis.

Speakers:

Stephen Kulinski, representing the applicant, spoke in support of the request.

SUP #2011-0064
109 East Walnut Avenue



SUP #2011-0064

11/1/2011



I. DISCUSSION

The applicant, East Walnut Street LLC, represented by Stephen Kulinski, architect, requests Special Use Permit approval to construct a new single-family dwelling on a substandard lot at 109 East Walnut Avenue.

SITE DESCRIPTION

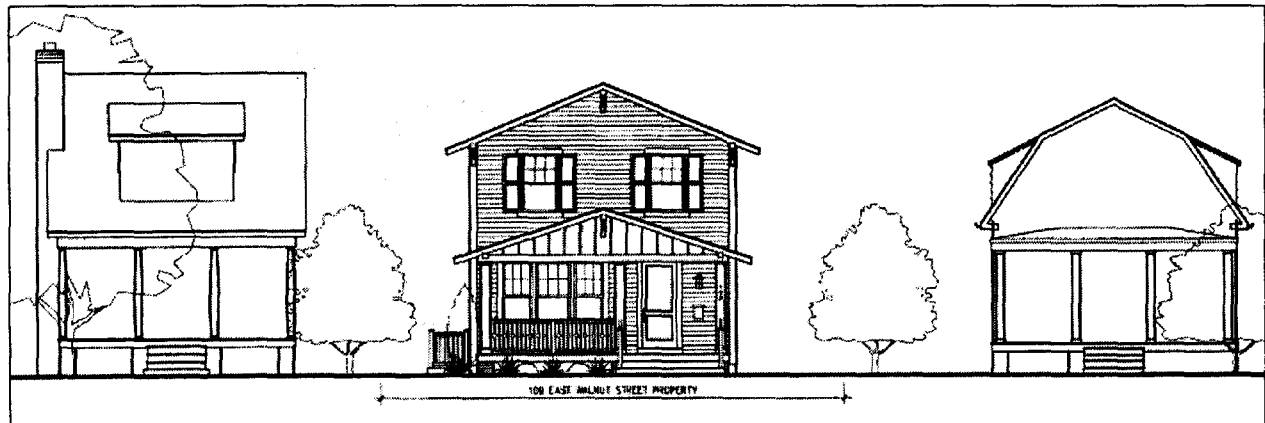
The subject site is one lot of record with 40 feet of frontage on East Walnut Avenue, 110 feet of depth and a total lot area of 4,400 square feet.

The site is surrounded by other single-family dwellings.



PROPOSAL

The applicant requests Special Use Permit approval to construct a new two-story single-family dwelling on this substandard lot. The existing one-story dwelling and one-car detached garage will be demolished. The proposed dwelling will measure 1,979 square feet in size and 22.4 feet in height. It is Colonial in design, with clapboard-style hardiplank siding, and features two full stories, a front porch, and a roofline running perpendicular to the street.



ZONING/MASTER PLAN DESIGNATION

The property is located in the R2-5/Single and Two-Family Residential zone, which ordinarily requires a minimum lot size of 5,000 square feet, minimum lot frontage of 40 feet and minimum lot width of 50 feet for a single-family dwelling. The subject lot is substandard in terms of lot area and lot width, but meets the minimum lot frontage requirement.

The provisions of Section 12-900 of the Zoning Ordinance, approved as part of the infill regulations, apply in this case because the substandard lot is already developed. Section 12-901(C) requires a Special Use Permit for the demolition and construction of a new dwelling on a substandard lot that exceeds the floor area of the existing dwelling by more than 10%, which is the case here, since the proposed new dwelling exceeds the floor area of the existing dwelling by 96%. This section of the Ordinance also requires a finding by City Council “that the proposed development will be compatible with the existing neighborhood character in terms of bulk, height, and design.”

The proposal meets Zoning Ordinance requirements regarding setbacks, FAR, building height and threshold height. Additional zoning elements of the applicant’s proposal can be found in the table on the following page:

	<u>Requirement</u>		<u>Proposal</u>
Lot Size	5,000 Sq. Ft. Min		4,400 Sq. Ft.
Lot Width	50' Min		40'
Lot Frontage	40' Min		40'
Front Yard	Established setback	22.6'	22.6'
Side Yard (East)	1:3 with 7' min	7.5'	7.7'
Side Yard (West)	1:3 with 7' min	7.5'	9.3'
Rear Yard	1:1 with 7' min	22.4'	38'
Building Height	Max: prevailing (21.1') plus 20% OR 25' whichever is higher	25.3'	22.4'
Threshold Height	Max: prevailing (3.2') plus 20%	3.8'	2.3'
FAR	0.45 max		0.45
FAR over existing house	1012 Sq. Ft. + 10% = 1113 Sq. Ft. max without SUP		1,979 Sq. Ft.

MASTER PLAN DESIGNATION

The proposed use is consistent with the Potomac West Small Area Plan chapter of the Master Plan which designates the property for residential use.

PARKING

Pursuant to Section 8-200(A)(1) of the Zoning Ordinance, a minimum of two standard-size parking spaces are required for single-family detached dwellings. The applicant meets this parking requirement by providing a total of two tandem parking spaces in the existing driveway.

II. STAFF ANALYSIS

Staff supports the applicant's proposal to redevelop this substandard lot with a new single-family dwelling. The design of the proposed dwelling fits well in the neighborhood and the overall height, threshold height, and placement on the lot are appropriate here.

The design of the dwelling is similar to other neighborhood homes in that it follows a simple Colonial style, has two full stories, and includes a front porch. The perpendicular roofline of the proposed porch, while unique compared to other porches on the street, is a reasonable departure from strict design uniformity and does not detract from the overall compatibility of the dwelling. The proposed clapboard-style siding is typical for the neighborhood, and the window scheme, after revisions to each side of the dwelling as requested by staff, is reasonable and balanced. The footprint of the dwelling and its placement on the lot follows the dominant development pattern of relatively narrow and long homes with modest side yard setbacks and tandem parking to one side of the dwelling.

Staff has closely considered the matter of overall building height given that the proposed dwelling is a full story taller than the dwelling it replaces. As a general matter, staff believes that a two-story dwelling here is appropriate and notes that the existing home is the only one-story dwelling on the block. With the exception of a few one-and-a-half story homes, the majority of the houses are two-stories tall. Nonetheless, staff was initially concerned that the original proposal was slightly too tall compared to its immediate neighbors, and asked the applicant to lower the overall building height. The applicant revised the proposal by almost two feet, from 24.2 to 22.4 feet, such that it is now about three feet shorter than what is allowed under infill regulations. Although it is about a foot taller than the average overall height found in homes on the blockface, the dwelling still falls within the range of building heights found there. Staff is also satisfied that the proposal now compares favorably to its immediate neighbors, with the two houses to the east measuring 21.7 and 23.8 feet in height and the two houses to the west measuring 20.8 and 22.8 feet in height.

Two conditions related to the driveway have been included in this report. One condition, which has been included in virtually all other substandard lot cases, requires the existing driveway to maintain, or any new driveway area to use, a permeable paving system. The other condition stipulates that a portion of the existing driveway should be removed to comply with the Zoning

Ordinance requirement that no driveway shall occupy more than 50% of a required yard, which in this case is the west side yard.

Staff concludes that the proposal is a reasonable plan for the redevelopment of this substandard lot and recommends approval of the Special Use Permit request subject to the conditions contained in Section III of this report.

III. RECOMMENDED CONDITIONS

Staff recommends **approval** subject to compliance with all applicable codes and ordinances and the following conditions:

1. The design of the dwelling shall be substantially consistent with the submitted illustrations dated October 14, 2011 to the satisfaction of the Director of Planning & Zoning. (P&Z)
2. The existing driveway shall maintain, and any new driveway areas shall be constructed with, a permeable paving system to the satisfaction of the Director of Planning & Zoning. (P&Z)
3. The applicant shall depict on the grading plan submission the removal of a portion of the existing driveway such that the driveway does not occupy more than 50% of any required yard to the satisfaction of the Director of Planning & Zoning. (P&Z)
4. The applicant shall be responsible for repairs to the adjacent city right-of-way if damaged during construction activity. (T&ES)
5. No permanent structure may be constructed over any existing private and/or public utility easements. It is the responsibility of the applicant to identify any and all existing easements on the plan. (T&ES)

STAFF: Barbara Ross, Deputy Director, Department of Planning and Zoning;
Nathan Randall, Urban Planner.

Staff Note: In accordance with section 11-506(c) of the zoning ordinance, construction or operation shall be commenced and diligently and substantially pursued within 18 months of the date of granting of a special use permit by City Council or the special use permit shall become void.

IV. CITY DEPARTMENT COMMENTS

Legend: C - code requirement R - recommendation S - suggestion F - finding

Transportation & Environmental Services:

- R-1 The applicant shall be responsible for repairs to the adjacent city right-of-way if damaged during construction activity. (T&ES)
- R-2 No permanent structure may be constructed over any existing private and/or public utility easements. It is the responsibility of the applicant to identify any and all existing easements on the plan. (T&ES)
- C-1 An erosion and sediment control plan must be approved by T&ES prior to any land disturbing activity greater than 2500 square feet. An erosion and sediment control bond shall be posted prior to release of the grading plan. (Sec.5-6-224) (T&ES)
- C-2 An approved GRADING PLAN must be attached to the building permit application. City Code Section -5-6-224 requires that a grading plan be submitted to and approved by T&ES prior any land disturbing activities or the issuance of building permits for improvements involving:
- the construction of a new home;
 - construction of an addition to an existing home where either
 - the addition exceeds the area of the existing building footprint by 100% or more;
 - or, the construction of the addition results in less that 50% of the existing first floor exterior walls, in their entirety, remaining;
 - changes to existing grade elevation of 1-foot or greater;
 - changes to existing drainage patterns;
 - land disturbance of 2,500 square feet or greater.
- Questions regarding the processing of grading plans should be directed to the T&ES Site Plan Coordinator at (703) 746-4064. Memorandum to Industry No. 02-08 was issued on April 28, 2008 and can be viewed online via the following link.
<http://alexandriava.gov/uploadedFiles/tes/info/gradingPlanRequirements.pdf>
- C-3 If construction of the residential unit(s) result in land disturbing activity in excess of 2500 square feet, the applicant is required to comply with the provisions of Article XIII of the City's Zoning Ordinance for stormwater quality control. (T&ES)
- C-4 Roof, surface and sub-surface drains be connected to the public storm sewer system, if available, by continuous underground pipe. Where storm sewer is not available applicant must provide a design to mitigate impact of stormwater drainage onto adjacent properties and to the satisfaction of the Director of Transportation & Environmental Services. (Sec.5-6-224) (T&ES)
- C-5 All secondary utilities serving this site shall be placed underground. (Sec. 5-3-3) (T&ES)

- C-6 All improvements to the city right-of-way such as curbing, sidewalk, driveway aprons, etc. must be city standard design and must be included on the required Grading Plan. (Sec. 5-2-1) (T&ES)
- C-7 Any work within the right-of-way requires a separate permit from T&ES. (Sec. 5-2) (T&ES)
- C-8 The applicant shall comply with the City of Alexandria's Noise Control Code, Title 11, Chapter 5, which sets the maximum permissible noise level as measured at the property line. (T&ES)
- C-9 Pay sanitary sewer tap fee prior to release of Grading Plan. (Sec. 5-6-25) (T&ES)
- C-10 The applicant shall comply with the City of Alexandria's Solid Waste Control, Title 5, Chapter 1, which sets forth the requirements for the recycling of materials. (Sec. 5-1-99) (T&ES)
- C-11 The building permit plans shall comply with requirements of City Code Section 5-6-224 regarding the location of downspouts, foundation drains and sump pumps. Refer to Memorandum to Industry dated June 18, 2004. [Memorandum is available online at the City web site under Transportation\Engineering and Design\Memos to Industry.]. (T&ES)

Code Enforcement:

- F-1 The review by Code Administration is a preliminary review only. Once the applicant has filed for a building permit, code requirements will be based upon the building permit plans. If there are any questions, the applicant may contact Thomas Sciulli, Plan Review Supervisor at thomas.sciulli@alexandriava.gov or 703-746-4190. (Code)
- C-1 Demolition, building and trades permits are required for this project. Five sets of *construction documents* sealed by a *Registered Design Professional* that fully detail the construction as well as layout and schematics of the mechanical, electrical, and plumbing systems shall accompany the permit application(s)
- C-2 A soils report must be submitted with the building permit application.
- C-3 All exterior walls shall comply with Table R302.1 of the 2009 USBC (2009 IRC as amended). See section R302.2 for *Townhouse* exception.
- C-4 New construction must comply with the current edition of the Uniform Statewide Building Code (USBC).

Health:

F-1 No Comment

Parks and Recreation:

F-1 No Comment

Police Department:

F-1 No Comment



APPLICATION

SPECIAL USE PERMIT

SPECIAL USE PERMIT # 2011-0064

PROPERTY LOCATION: 109 E Walnut Street

TAX MAP REFERENCE: 053.04-10-05 **ZONE:** R 2-5

APPLICANT:

Name: EAST WALNUT STREET LLC

Address: PO BOX 7469 ALEXANDRIA VA 22307

PROPOSED USE: Single family residence

THE UNDERSIGNED, hereby applies for a Special Use Permit in accordance with the provisions of Article XI, Section 4-11-500 of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

THE UNDERSIGNED, having obtained permission from the property owner, hereby grants permission to the City of Alexandria staff and Commission Members to visit, inspect, and photograph the building premises, land etc., connected with the application.

THE UNDERSIGNED, having obtained permission from the property owner, hereby grants permission to the City of Alexandria to post placard notice on the property for which this application is requested, pursuant to Article IV, Section 4-1404(D)(7) of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

THE UNDERSIGNED, hereby attests that all of the information herein provided and specifically including all surveys, drawings, etc., required to be furnished by the applicant are true, correct and accurate to the best of their knowledge and belief. The applicant is hereby notified that any written materials, drawings or illustrations submitted in support of this application and any specific oral representations made to the Director of Planning and Zoning on this application will be binding on the applicant unless those materials or representations are clearly stated to be non-binding or illustrative of general plans and intentions, subject to substantial revision, pursuant to Article XI, Section 11-207(A)(10), of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

Stephen Kulinski - Architect/agent
Print Name of Applicant or Agent
104 N West Street
Mailing/Street Address
Alexandria, VA 22314
City and State Zip Code

[Signature] 8/18/11
Signature Date
703-836-7243 703-836-7247
Telephone # Fax #
steve@kulinskigroup.com
Email address

ACTION-PLANNING COMMISSION: _____ **DATE:** _____
ACTION-CITY COUNCIL: _____ **DATE:** _____

PROPERTY OWNER'S AUTHORIZATION

As the property owner of _____, I hereby
 (Property Address)
 grant the applicant authorization to apply for the _____ use as
 (use)
 described in this application.

Name: _____ Phone: _____
 Please Print
 Address: _____ Email: _____
 Signature: _____ Date: _____

1. Floor Plan and Plot Plan. As a part of this application, the applicant is required to submit a floor plan and plot or site plan with the parking layout of the proposed use. The SUP application checklist lists the requirements of the floor and site plans. The Planning Director may waive requirements for plan submission upon receipt of a written request which adequately justifies a waiver.

Required floor plan and plot/site plan attached.

Requesting a waiver. See attached written request.

2. The applicant is the (check one):

Owner

Contract Purchaser

Lessee or

Other: _____ of the subject property.

State the name, address and percent of ownership of any person or entity owning an interest in the applicant or owner, unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent.

OWNERSHIP AND DISCLOSURE STATEMENT

Use additional sheets if necessary

1. Applicant. State the name, address and percent of ownership of any person or entity owning an interest in the applicant, unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

Name	Address	Percent of Ownership
1. EAST WALNUT ST LLC	PO BOX 7469 ALEXANDRIA, VA 22307	100%
2.		
3.		

2. Property. State the name, address and percent of ownership of any person or entity owning an interest in the property located at _____ (address), unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

EAST WALNUT ST. LLC
same

Name	Address	Percent of Ownership
1. Mark Poskaitis	P.O. Box 7469 Alexandria, VA 22307	33 1/3%
2. Arthur Fox	P.O. Box 7469 Alexandria, VA 22307	33 1/3%
3. Joseph Hanson	P.O. Box 7469 Alexandria, VA 22307	33 1/3%

3. Business or Financial Relationships. Each person or entity indicated above in sections 1 and 2, with an ownership interest in the applicant or in the subject property are require to disclose any business or financial relationship, as defined by Section 11-350 of the Zoning Ordinance, existing at the time of this application, or within the 12-month period prior to the submission of this application with any member of the Alexandria City Council, Planning Commission, Board of Zoning Appeals or either Boards of Architectural Review. All fields must be filled out completely. Do not leave blank. (If there are no relationships please indicated each person or entity below and "None" in the corresponding fields)

Name of person or entity	Relationship as defined by Section 11-350 of the Zoning Ordinance	Member of the Approving Body (i.e. City Council, Planning Commission, etc.)
1. NONE		
2. EAST WALNUT ST. LLC	NONE	
3.		

NOTE: Business or financial relationships of the type described in Sec. 11-350 that arise after the filing of this application and before each public hearing must be disclosed prior to the public hearings.

As the applicant or the applicant's authorized agent, I hereby attest to the best of my ability that the information provided above is true and correct.

8-18-11 _____
Date Printed Name

Stephen Kulinski

Signature

If property owner or applicant is being represented by an authorized agent such as an attorney, realtor, or other person for which there is some form of compensation, does this agent or the business in which the agent is employed have a business license to operate in the City of Alexandria, Virginia?

Yes. Provide proof of current City business license

No. The agent shall obtain a business license prior to filing application, if required by the City Code.

NARRATIVE DESCRIPTION

3. The applicant shall describe below the nature of the request **in detail** so that the Planning Commission and City Council can understand the nature of the operation and the use. The description should fully discuss the nature of the activity. (Attach additional sheets if necessary.)

The application is for a new single family house to replace the existing one bedroom house currently located on the property. The home is designed to comply with the infill regulations and to fit in with the character of the neighborhood.

Parking for two full size cars will be provided in the existing driveway in a tandem configuration. The existing one car garage located at the rear of the property will remain as well as the existing driveway concrete driving strips that provide access to the garage and the parking pad immediately in front of the garage.

The new house design will be two stories in height with a full width one story front porch. the new house is located between two existing two story houses. The house will be only three feet wider (23 feet) than the existing house (20 feet) The Architecture style will respect the look of the current neighborhood structures.

The substandard property has the same or more square footage (4,400) of every lot on the blockface and every lot on the opposite blockface with the exception of the corner lots.

The house is designed to comply with the infill regulations and the average blockface height and setback requirements. The existing curb cut will be reused and the street parking situation will remain unchanged.

USE CHARACTERISTICS

4. The proposed special use permit request is for (check one):

- a new use requiring a special use permit,
- an expansion or change to an existing use without a special use permit,
- an expansion or change to an existing use with a special use permit,
- other. Please describe: a new single family dwelling to replace existing dwelling on a substandard lot

5. Please describe the capacity of the proposed use:

A. How many patrons, clients, pupils and other such users do you expect?
Specify time period (i.e., day, hour, or shift).

N/A

B. How many employees, staff and other personnel do you expect?
Specify time period (i.e., day, hour, or shift).

N/A

6. Please describe the proposed hours and days of operation of the proposed use:

Day:
N/A

Hours:
N/A

7. Please describe any potential noise emanating from the proposed use.

A. Describe the noise levels anticipated from all mechanical equipment and patrons.

Typical for a single family house

B. How will the noise be controlled?

N/A

8. Describe any potential odors emanating from the proposed use and plans to control them:

N/A

9. Please provide information regarding trash and litter generated by the use.

A. What type of trash and garbage will be generated by the use? (i.e. office paper, food wrappers)
standard household waste

B. How much trash and garbage will be generated by the use? (i.e. # of bags or pounds per day or per week)
2 bags per week

C. How often will trash be collected?
weekly

D. How will you prevent littering on the property, streets and nearby properties?
N/A

10. Will any hazardous materials, as defined by the state or federal government, be handled, stored, or generated on the property?

Yes. No.

If yes, provide the name, monthly quantity, and specific disposal method below:

11. Will any organic compounds, for example paint, ink, lacquer thinner, or cleaning or degreasing solvent, be handled, stored, or generated on the property?

Yes. No.

If yes, provide the name, monthly quantity, and specific disposal method below:

12. What methods are proposed to ensure the safety of nearby residents, employees and patrons?
N/A

ALCOHOL SALES

13.

A. Will the proposed use include the sale of beer, wine, or mixed drinks?

Yes No

If yes, describe existing (if applicable) and proposed alcohol sales below, including if the ABC license will include on-premises and/or off-premises sales.

PARKING AND ACCESS REQUIREMENTS

14. A. How many parking spaces of each type are provided for the proposed use:

- 2 tandem Standard spaces
- _____ Compact spaces
- _____ Handicapped accessible spaces.
- _____ Other.

<p>Planning and Zoning Staff Only</p> <p>Required number of spaces for use per Zoning Ordinance Section 8-200A _____</p> <p>Does the application meet the requirement?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

B. Where is required parking located? (check one)

- on-site
- off-site

If the required parking will be located off-site, where will it be located?

PLEASE NOTE: Pursuant to Section 8-200 (C) of the Zoning Ordinance, commercial and industrial uses may provide off-site parking within 500 feet of the proposed use, provided that the off-site parking is located on land zoned for commercial or industrial uses. All other uses must provide parking on-site, except that off-street parking may be provided within 300 feet of the use with a special use permit.

C. If a reduction in the required parking is requested, pursuant to Section 8-100 (A) (4) or (5) of the Zoning Ordinance, complete the PARKING REDUCTION SUPPLEMENTAL APPLICATION.

Parking reduction requested; see attached supplemental form

15. Please provide information regarding loading and unloading facilities for the use:

A. How many loading spaces are available for the use? N/A

<p>Planning and Zoning Staff Only</p> <p>Required number of loading spaces for use per Zoning Ordinance Section 8-200 _____</p> <p>Does the application meet the requirement?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
--

B. Where are off-street loading facilities located? N/A

C. During what hours of the day do you expect loading/unloading operations to occur?
N/A

D. How frequently are loading/unloading operations expected to occur, per day or per week, as appropriate?
N/A

16. Is street access to the subject property adequate or are any street improvements, such as a new turning lane, necessary to minimize impacts on traffic flow?
Access is adequate

SITE CHARACTERISTICS

17. Will the proposed uses be located in an existing building? Yes No
 Do you propose to construct an addition to the building? Yes No
 How large will the addition be? _____ square feet.

18. What will the total area occupied by the proposed use be?
 _____ sq. ft. (existing) + _____ sq. ft. (addition if any) = 1,980 sq. ft. (total)

19. The proposed use is located in: (check one)
 a stand alone building
 a house located in a residential zone
 a warehouse
 a shopping center. Please provide name of the center: _____
 an office building. Please provide name of the building: _____
 other. Please describe: _____

End of Application

FRONT SETBACK DATA									
EAST WALNUT STREET									
Setback From		Setback From							
Address #	Face of Curb	Address #	Face of Curb						
101	30.4	117	22.2						
103	21.6	119	22.1						
105	20.6	121	22.4						
107	21.7	123	20.4						
111	21.8	125	22.9						
113	26.2	127	22.7						
115	22.4	129	22.5						
			AVERAGE =	22.6					
Building & Threshold Height Data									
A	B	C	D	E	F	G	H	I	
		1st Floor	Bottom	Top	(C-B)	(D-B)	(E-B)	(G+H)/2	
	Ground	Threshold	of Roof	of Roof	Distance	Distance	Distance	Building	
Address #	Elevation	Elevation	Elevation	Elevation	Ground to 1st Floor	Bottom of Roof	Top of Roof	Height	
101	27.7	31.4	49.2	57.7	3.7	21.5	30.0	25.8	
103	27.2	30.1	43.4	50.6	2.9	16.2	23.4	19.8	
105	26.7	29.8	45.8	53.2	3.1	19.1	26.5	22.8	
107	26.5	29.5	44.2	50.4	3.0	17.7	23.9	20.8	
111	26.0	29.2	43.2	52.2	3.2	17.2	26.2	21.7	
113	25.9	29.2	45.6	53.8	3.3	19.7	27.9	23.8	
115	25.5	28.6	41.6	49.0	3.1	16.1	23.5	19.8	
117	25.2	28.4	44.9	51.5	3.2	19.7	26.3	23.0	
119	24.9	28.0	42.5	48.9	3.1	17.6	24.0	20.8	
121	24.5	27.1	38.4	49.8	2.6	13.9	25.3	19.6	
123	24.2	27.4	44.1	51.9	3.2	19.9	27.7	23.8	
125	23.4	26.7	34.9	49.5	3.3	11.5	26.1	18.8	
127	23.6	26.7	35.1	46.3	3.1	11.5	22.7	17.1	
129	23.2	26.8	35.2	46.6	3.6	12.0	23.4	17.7	
AVERAGE	25.3	28.5	42.0	50.8	3.2	16.7	25.5	21.1	

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