

Date: 10/22/2014

To: Density Bonus Working Group

Subject: Transition Document on Density Bonus Working Group

I. Introduction:

This document is a summary of recommendations by the Density Bonus Working Group, a collection of stakeholders convened by the San Diego Housing Commission to recommend updates to the City of San Diego's density bonus program.

The Density Bonus Working Group ("Working Group") identified a variety of tools that the City of San Diego can consider to encourage more developers to use the density bonus program, to create more of both market-rate and affordable housing.

II. Summary of Recommendations:

Through a process of informal consensus, the Working Group recommended that the City of San Diego's density bonus program be updated to include the below items. A more detailed discussion follows later in this memorandum.

- Allow additional units for projects that provide a higher percentage of affordable housing.
- Grant additional concessions from development regulations for projects that provide a higher percentage of affordable housing.
- Round up permissible unit counts during both underlying density calculations, and for density bonus calculations.
- Allow affordable housing density bonus project that require a Site Development Permit (SDP) as a requirement of a Planned District Ordinance to reduce the SDP from a Process Three to a Process Two.
- Dedicate the impact fee revenue from units in excess of the underlying allowed density to fund infrastructure identified as priorities within the communities where those density bonus projects are built.
- Rename the "density bonus" program to the "affordable homes bonus" program, to reflect the variety of benefits provided separate from ordinary density.
- The updated "affordable homes bonus" program should be marketed to the development community, to both demystify and encourage use of the program.

The Working Group did not have an opportunity to discuss how to structure an option for projects to receive a density bonus if they satisfied their obligation to construct affordable homes off-site. A summary of issues that would need to be addressed for such a program to function is included below.

III. Background on Density Bonus Program:

a. State law requires cities to have a density bonus program.

State law requires local governments to implement a density bonus program. (CA Gov. Code §§ 65915-65918). The density bonus program provides a variety of benefits to developers that build at least some affordable units among their projects:

- (1) Density benefits: Projects that include affordable housing are permitted to build modestly more units than the underlying land use rules ordinarily allow. The amount of added units is based on a sliding scale, which increases along with the percentage of affordable units included in the project, maxing out at an additional 35 percent.
- (2) Parking benefits: Projects that include affordable homes under the density bonus program are entitled to use a set of parking minimums that are prescribed under the State code, regardless of what the local rules otherwise require.
- (3) Incentives: Projects that include affordable homes can receive up to three “incentives,” increasing along a sliding scale based on the percentages of affordable units included. These incentives are characterized in statute as concessions from local development standards.

b. Local governments in California enjoy some discretion on how to implement density bonus.

Local governments in California have some discretion on how to implement density bonus. The state density bonus statute sets a minimum threshold for providing development benefits for projects that include affordable homes. However, the State statute does not preclude local governments from providing even greater incentives for developments that include affordable homes.

Many cities have implemented density bonus through their municipal codes, city guidelines, and other documents. Some cities detail the types of “incentives” they will grant, and others outline specified processes for approval of density bonus projects. Some cities, like San Francisco, have no specific local density bonus code. Instead, they rely on the State density bonus statute as a process that overrules their local land use rules when developers seek to use density bonus benefits. These programs reflect a diversity of approaches to implementing the State mandate.

The City of San Diego adopted a density bonus Municipal Code intended to comply with the State density bonus law. Subsequently, State law has changed, and the City is currently undergoing a process to review and update the City Municipal Code to conform to the State density bonus statute. Generally, the City Municipal Code parallels the requirements in the State density bonus law, without significant tailoring to San Diego. Of note, the process for granting incentives is administered by City staff, and is considered non-discretionary.

- c. The City of San Diego's density bonus program has not produced many affordable homes in market-rate developments.

The City of San Diego's density bonus program has not been used by many market-rate developers. Between 2000-2013, only 57 units of affordable housing within nine market-rate buildings were created through density bonus.

100 percent affordable developments often use density bonus. Those developments automatically qualify for the program by virtue of the affordable units they are already building. It is difficult to determine how many units in 100 percent affordable developments are built "but for density bonus." Often, the limiting factor for the development of affordable homes is the amount of gap financing available, not underlying land use restrictions. Nonetheless, assuming a maximum of 35 percent of homes in 100 percent density bonus projects were the result of the program, no more than 757 have benefitted from density bonus.

A summary of density bonus production data from San Diego is detailed below.

San Diego Density Bonus Production

(Period from 2000 - 2013)

<u>Types of Developments</u>	<u>No. of Projects</u>	<u>No. of Affordable Units</u>	<u>Total Units in Project</u>
100% Affordable Developments	28	2,140	2,163
Market Rate Developments	9	57	630

These figures should be qualified because the City of San Diego's current density bonus rules were placed into effect in 2006. Moreover, the City of San Diego experienced a major slow-down in all residential development between 2007 and 2011.

- d. The City of Los Angeles has produced far more affordable homes than San Diego through their density bonus program.

The City of Los Angeles produced 917 units of affordable housing in market-rate density bonus projects, between 2008 and 2012. This dataset represents the production after Los Angeles adopted its most recent local density bonus code.

For average yearly production, Los Angeles is building 5,229 percent more affordable homes than San Diego in market rate developments using density bonus. While Los Angeles is larger than San Diego, that alone cannot explain the great disparity between home production. Los Angeles is about four times the size of San Diego, not 5,000 times. A summary of density bonus production data from Los Angeles is detailed below.

While the development environment in Los Angeles is different than from San Diego on many levels, the disparity in density bonus construction illustrates that density bonus, as a concept, can be used more widely than is currently being used in San Diego. The Los Angeles experience shows that if a program is properly calculated, local governments can effectively trade development rights for the construction of affordable homes in market-rate developments.

Los Angeles Density Bonus Production:

(Period from 2008 - 2012)

<u>Types of Developments</u>	<u>No. of Projects</u>	<u>No. of Affordable Units</u>	<u>Total Units in Project</u>
Affordable Housing Trust Fund (generally 100% affordable developments)	55	2,658	2,942
Market Rate Developments	133	917	5,643

IV. Working Group Recommendations:

The Working Group discussed and recommended the below updates to the City of San Diego's density bonus program.

- a. Developments that build higher percentages of affordable housing should be able to construct modestly more overall units.

Under state density bonus law, projects can build more units than the underlying zoning allows, if they dedicate a percentage of their units as affordable. The percentage of additional units allowed runs along a sliding scale, depending on the level of affordability, and the percentage of units dedicated as affordable. Under the density bonus statute, the maximum density bonus is 35 percent over the underlying allowed density.

Historically, San Diego offered a density bonus of up to 50 percent greater than underlying density. That percentage was reduced to 35 percent after the State adopted density bonus law in its current form.

The working group recommends restoring the density bonus to a maximum of 50 percent. The working group proposes an acceleration of density benefits at the same rate as identified in the State density bonus statute.

As an example from the current rules, if a development dedicates some of their units to very low income tenants, they receive a 20 percent density bonus for dedicating 5 percent of their units. The percentage of density bonus increases by 2.5 percent for every 1 percent of units dedicated to affordable tenants. This maxes out at 35 percent density bonus, once 11 percent of the units are dedicated as affordable. Beyond 11 percent, there is no further incentive for market-rate developers to dedicate more units as affordable, because there would be no further increase in permissible density.

Under the Working Group's proposal, a project could dedicate 12 percent of their units to affordable housing, and receive 37.5 percent density bonus. Further increases in affordable set-asides would result in increased density bonus, up to 50 percent. A spreadsheet illustrating the proposed increase of permissible units is attached as an appendix to this memorandum.¹

For downtown San Diego, residential developments are not limited by the number of units per acre. Instead, Floor Area Ratio (FAR) is the primary limitation on the number of units that may be developed. The City of San Diego currently allows developments downtown that incorporate affordable homes to receive a bonus of FAR, equal to the percentage allowed under State density bonus law. The Working Group recommends that the FAR bonuses downtown continue to parallel the City's other density bonus rules, allowing added FAR up to 50 percent, as more affordable homes are incorporated into a project.

b. Developments that build higher percentages of affordable homes should be eligible to receive more "incentives."

Under state density bonus law, projects that build affordable units receive "incentives," which are concessions from local development standards. Projects receive more incentives on a sliding scale, based on what percentage of a project is dedicated as affordable.

Incentives allow developers to make small adjustments to the underlying development rules, necessary to accommodate the added units provided under the density bonus program. The definition of incentives under the State density bonus statute is broad, allowing developers flexibility to determine what sort of concessions their project will require. Local governments may deny concessions, but only on narrow grounds, such as requests for concessions that threaten health and safety. The relevant text describing incentives is as follows:

A reduction in site development standards or a modification of zoning code requirements or architectural design requirements . . . including, but not limited to, a reduction in setback and square footage requirements and in the ratio of vehicular parking spaces that would otherwise be required that results in identifiable, financially sufficient, and actual cost reductions.

CA. Gov. Code Section 65915(k)(1).

The State density bonus statute limits the available number of incentives to three for each project. The Working Group proposes allowing projects to receive up to five incentives, if they provide more affordable housing than the amount conceived by the State density bonus statute. Five incentives were considered to be a modest increase above the three incentives provided by the State, but still sufficient to encourage more developers to build even higher numbers of affordable units.

Like with the overall density benefits, the Working Group recommended providing additional incentives at the same rate as the State statute. As an example, a developer would receive one incentive for every five percent of their units dedicated to very low income residents. Instead of a developer maxing out their potential incentives by dedicating 15 percent of their units as affordable to very low income residents, a developer could receive up to five incentives if they dedicated 25 percent of their

¹ Appendix B: Proposed Density Benefits.

units. A spreadsheet illustrating the proposed scale for incentives is attached as an appendix to this memorandum.²

c. Calculations for permissible units under density bonus should be rounded up twice.

In ordinary density calculations, the City of San Diego multiplies a parcel's acreage by the number of units allowed for that parcel's zoning. The resulting figure represents the number of permissible units that can be built on the site. Calculations yielding fractional units are rounded down if the figure ends in less than .5 units, and up if .5 units or greater. With density bonus, a second calculation occurs, multiplying the base density by the density bonus, which can be up to a 35 percent increase.

Under the State density bonus statute, "All density calculations resulting in fractional units shall be rounded up to the next whole number." CA. Gov. Code Section 65915(f)(5). Some cities, including San Diego, interpret this to mean that only the second calculation is rounded up. Other cities interpret the density bonus statute to require rounding density calculations upwards for fractional units, both for underlying density, and for density bonus.

The Working Group recommends that the City of San Diego begin to round up density calculations for both the baseline and the density bonus calculations. At most, these calculations will lead to only one extra unit per project, and only in a limited number of circumstances.

The increased amount of housing will be relatively small, both city-wide and in particular neighborhoods. However, the extra units can have a meaningful impact on an individual project's financial feasibility. Margins for infill and affordable developments can be small. One additional unit can be the difference between a project that goes forward, and one that does not materialize.

d. Expedite density bonus projects in through the approval process.

Currently, many areas in the City of San Diego are covered by a Planned District Ordinance (PDO). Within PDOs, projects often require discretionary Site Development Permits (SDPs) through Process Three, even when they comply with all relevant land use rules.

The Working Group recommended allowing projects within PDO's that include affordable homes through density bonus to be approved with the less time-consuming Process Two. This change will allow projects that serve the City's goal to create more affordable homes to receive an expedited review. Public participation will still be preserved, because community planning groups are noticed regarding Process Two applications, and the community has a right to appeal from Process Two approvals.

e. Dedicate development fees from added units to infrastructure projects selected as priorities by community planning groups.

Projects in San Diego are generally charged development impact fees (DIFs) or Facility Benefits Assessments (FBAs) to offset the infrastructure costs associated with those projects. Those fees are allocated to infrastructure projects in a manner that balances City-wide goals, and projects identified as priorities by individual local planning groups.

² Appendix C: Proposed Incentive Benefits.

The DIF and FBA fees are calculated using the underlying density allowed by a community plan area's zoning. Yet, density bonus permits development in excess of the underlying zoning. Density bonus projects create some "additional" fee revenue.

The Working Group recommends that the City of San Diego adopt a policy to dedicate the fees generated by units added through density bonus to infrastructure identified as priorities by local planning groups. The "additional" fee revenue would directly benefit communities that accommodate the added units from density bonus projects.

So for a density bonus project, the fees generated for units allowed under the baseline density would be spent in accordance with the City's current and existing infrastructure prioritization plans. Fees generated for units added as a result of the density bonus project would be allocated in a different manner, for projects identified as priorities by the community. This way, community residents would see local infrastructure benefits, in exchange for accepting added density in their neighborhoods.

- f. Rename the "density bonus" program to the "affordable homes bonus" program, to reflect the variety of benefits awarded to projects that include affordable home.

The program currently named "density bonus" is about much more than the number of permissible units per acre. A variety of benefits are currently available for projects that incorporate affordable homes, including favorable parking ratios, concessions from development standards, and more. The Working Group recommends a variety of additional benefits, described above.

To reflect the broad nature of the benefits provided under the program, the Working Group recommends renaming the City's policy the "affordable homes bonus" program. The update to the program name may also help to moderate some community concern about density increases in the City, since the program, even as envisioned by the Working Group, would only result in modest increases in density over a limited number of parcels.

- g. The updated "affordable homes bonus" program should be marketed to the development community, to both demystify and encourage use of the program.

The Working Group feels that the density bonus program, in both its current and potential form, offers valuable benefits to market-rate developers. However, few market-rate developers have chosen to use the program.

The Working Group recommends that the City of San Diego engage in a vigorous marketing program to encourage the market-rate development community to use the updated density bonus (or renamed "affordable homes bonus") program. The specific marketing efforts should be based on the ultimate outcome of the updated program, as decided by the City Council, City Administration, and Mayor. However, the Working Group identified a number of options the City could consider:

- **Step-By-Step Guide:** The City can create a step-by-step guide to using the density bonus program, similar to the guide published by the City for applying for development permits. The guide would use plain language, diagrams, and other tools to explain the program in plain language to developers.

- **Examples of Projects:** As a part of any set of publications the City creates, a list of example projects could be included. These would include projects already created, or imagined examples. Such a list would help show what sort of incentives developers have received, so that developers and the public can understand the extent of the concessions the program contemplates.
- **Road Show:** The City development services staff can present information about the revised density bonus program to industry and community groups, to expand understanding of the program. Target audiences can include community planning groups, the Building Industry Association, the San Diego Housing Federation, and others.

V. Further Research and Process:

The Working Group performed only a limited review of potential updates to the City of San Diego's density bonus program. Before the program is formally amended, the below issues should be addressed.

- a. The City of San Diego should be responsible for drafting and submitting for public review a formal code amendment language.

A more thorough public vetting process is necessary to develop a concrete proposal to be reviewed by the public, the Council of Community Planners, the Planning Commission, and ultimately the City Council. City staff will be responsible for developing such a proposal, and shepherding it through the public review process.

- b. Further discussion and investigation should go into any proposal to allow for off-site density bonus.

One area where the Working Group did not discuss a set of policy proposals is the concept of "off-site density bonus." Over the past few years, a number of voices have suggested proposals to allow for projects to receive a density bonus, or similar benefits, in exchange for developing affordable homes in off-site separate developments.³

Implementing off-site density bonus would require several policy decisions to ensure that allowing such an option did not undercut the intent of density bonus law. The City could organize stakeholder discussions to inform policy decisions that implement off-site density bonus. Alternatively, interested industry groups and advocates could develop a proposal for off-site density bonus on their own initiative, and bring it to the City to review and implement.

Generally, the purpose of density bonus law is to marry the interests of both affordable housing advocates, and market-rate developers. Developers get to build more units, and earn more profit, in exchange for creating more affordable homes in the same areas as new market-rate homes. For off-site density bonus to achieve similar goals, the below issues would need to be resolved.

³ C.f., Mayor Kevin Faulconer's "One San Diego Transition Advisory Committee Report," June 12, 2014, at page 14. Available at <http://www.sandiego.gov/mayor/pdf/transitionadvisoryreport.pdf>, last visited October 8, 2014.

(1) Distance: The general purpose of inclusionary housing policy, including the State density bonus program, is to ensure economically diverse neighborhoods, with equitable access to city services, transit, public education and infrastructure. Access to those amenities could be made available through requiring affordable homes in a neighborhood, not a specific building. For off-site density bonus to achieve the same values as on-site, some maximum distance should be imposed for how far off-site affordable homes can be built from new market-rate developments.

(2) Contribution: In some circumstances, affordable homes can be more efficiently constructed off-site from market-rate developments. If off-site affordable homes are developed in sufficient scale, those projects can gain access to public subsidies like federal Low Income Housing Tax Credits, adding leverage to the impact of a market-rate developer's contribution to affordable housing goals. Some policy mechanism would need to be established to ensure that if a developer used off-site density bonus, they would help create at least as many affordable homes as if the units were developed on-site.

(3) Surety: Some mechanism would need to be established to ensure that if a market-rate developer received a density bonus, the off-site affordable units will ultimately be created. Through other affordable housing programs in San Diego, bonds are posted with the Housing Commission to ensure affordable units are built. Additional mechanisms might be desirable for off-site density bonus, like requiring market-rate developers to enter into contracts with 100 percent affordable developers to contribute to actual and identifiable pipeline projects.

VI. Conclusion:

The density bonus program can be a useful tool to create more affordable homes in the City of San Diego. While the State density bonus statute sets a baseline, the City of San Diego can choose to provide additional benefits for developers that create more affordable homes. If calculated correctly, a revised density bonus program can create modestly more supply of both market-rate and affordable homes, to help address the rising costs of living in the San Diego region.

The Density Bonus Working Group discussed and determined that the above set of benefits were appropriate for the City of San Diego to consider, and possibly to adopt. Further efforts by the City will be required to draft municipal code language, and to refine the details of any formal proposal. Hopefully, these recommendations will help begin a process to update the City's density bonus program.

VII. Appendices:

- Appendix A: Roster of Working Group Participants
- Appendix B: Proposed Density Benefits
- Appendix C: Proposed Incentive Benefits

Appendix C: Roster of Working Group Participants

The below individuals were invited to working group meetings. They include City staff, advocates for affordable housing and development issues, and developers who used the density bonus program in the past.

- Laura Nunn - laura@housingsandiego.org
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Density Bonus Working Group - Proposed Density Benefits

Yellow = Areas of Permissible Policy Change
 Blue = Proposed Policy Change

Basis of Proposals:

Proposed acceleration at same rate as State law

Proposed maximums at 50% density benefits (as with prior SD rules)

AH	Very Low	Updated	Low	Updated	Moderate	Updated	Land	Updated	Senior -	Updated
Unit	Income -	Very Low	Income -	Low	Income -	Moderate	Donation -	Land	Donation -	Senior -
%	DB	DB	DB	DB	DB	DB	DB	DB	DB	DB
5%	20.0%	20.0%	-	-	-	-	-	-	20%	20%
6%	22.5%	22.5%	-	-	-	-	-	-	20%	20%
7%	25.0%	25.0%	-	-	-	-	-	-	20%	20%
8%	27.5%	27.5%	-	-	-	-	-	-	20%	20%
9%	30.0%	30.0%	-	-	-	-	-	-	20%	20%
10%	32.5%	32.5%	20%	20.0%	5%	5%	15%	15%	20%	20%
11%	35.0%	35.0%	21.50%	21.5%	6%	6%	16%	16%	20%	20%
12%	35%	37.5%	23%	23.0%	7%	7%	17%	17%	20%	20%
13%	35%	40.0%	24.50%	24.5%	8%	8%	18%	18%	20%	20%
14%	35%	42.5%	26%	26.0%	9%	9%	19%	19%	20%	20%
15%	35%	45.0%	27.50%	27.5%	10%	10%	20%	20%	20%	20%
16%	35%	47.5%	29%	29.0%	11%	11%	21%	21%	20%	20%
17%	35%	50%	30.50%	30.5%	12%	12%	22%	22%	20%	20%
18%	35%	50%	32%	32.0%	13%	13%	23%	23%	20%	20%
19%	35%	50%	33.50%	33.5%	14%	14%	24%	24%	20%	20%
20%	35%	50%	35.0%	35.0%	15%	15%	25%	25%	20%	20%
21%	35%	50%	35%	36.5%	16%	16%	26%	26%	20%	20%
22%	35%	50%	35%	38.0%	17%	17%	27%	27%	20%	20%
23%	35%	50%	35%	39.5%	18%	18%	28%	28%	20%	20%
24%	35%	50%	35%	41.0%	19%	19%	29%	29%	20%	20%
25%	35%	50%	35%	42.5%	20%	20%	30%	30%	20%	20%
26%	35%	50%	35%	44.0%	21%	21%	31%	31%	20%	21%
27%	35%	50%	35%	45.5%	22%	22%	32%	32%	20%	22%
28%	35%	50%	35%	47.0%	23%	23%	33%	33%	20%	23%
29%	35%	50%	35%	48.5%	24%	24%	34%	34%	20%	24%
30%	35%	50%	35%	50%	25%	25%	35%	35%	20%	25%
31%	35%	50%	35%	50%	26%	26%	35%	36%	20%	26%
32%	35%	50%	35%	50%	27%	27%	35%	37%	20%	27%
33%	35%	50%	35%	50%	28%	28%	35%	38%	20%	28%
34%	35%	50%	35%	50%	29%	29%	35%	39%	20%	29%
35%	35%	50%	35%	50%	30%	30%	35%	40%	20%	30%
36%	35%	50%	35%	50%	31%	31%	35%	41%	20%	31%
37%	35%	50%	35%	50%	32%	32%	35%	42%	20%	32%
38%	35%	50%	35%	50%	33%	33%	35%	43%	20%	33%
39%	35%	50%	35%	50%	34%	34%	35%	44%	20%	34%
40%	35%	50%	35%	50%	35%	35%	35%	45%	20%	35%
41%	35%	50%	35%	50%	35%	36%	35%	46%	20%	36%
42%	35%	50%	35%	50%	35%	37%	35%	47%	20%	37%
43%	35%	50%	35%	50%	35%	38%	35%	48%	20%	38%
44%	35%	50%	35%	50%	35%	39%	35%	49%	20%	39%
45%	35%	50%	35%	50%	35%	40%	35%	50%	20%	40%
46%	35%	50%	35%	50%	35%	41%	35%	50%	20%	41%
47%	35%	50%	35%	50%	35%	42%	35%	50%	20%	42%
48%	35%	50%	35%	50%	35%	43%	35%	50%	20%	43%
49%	35%	50%	35%	50%	35%	44%	35%	50%	20%	44%
50%	35%	50%	35%	50%	35%	45%	35%	50%	20%	45%
51%	35%	50%	35%	50%	35%	46%	35%	50%	20%	46%
52%	35%	50%	35%	50%	35%	47%	35%	50%	20%	47%
53%	35%	50%	35%	50%	35%	48%	35%	50%	20%	48%
54%	35%	50%	35%	50%	35%	49%	35%	50%	20%	49%
55%	35%	50%	35%	50%	35%	50%	35%	50%	20%	50%

Density Bonus Working Group - Proposed Incentives Benefits

Yellow = Areas of Permissible Policy Change
Blue = Proposed Policy Change

Basis of Proposals:			Senior: "Incentives" when 20% hits for Moderate		
Proposed acceleration at same rate as State law			Same acceleration as Moderate		
Proposed maximums at 5 Incentives					

AH	Very Low	Updated	Low	Updated	Mod.	Updated Mod.	Land	Updated	Senior	Updated
Unit %	Income - DB	Very Low Income - DB	Income - DB	Low Income - DB	Income - DB	Income - DB	Donation - DB	Land Donation - DB	DB	Senior - DB
5%	1	1						1		-
6%	1	1						1		-
7%	1	1						1		-
8%	1	1						1		-
9%	1	1						1		-
10%	2	2	1	1	1	1		2		-
11%	2	2	1	1	1	1		2		-
12%	2	2	1	1	1	1		2		-
13%	2	2	1	1	1	1		2		-
14%	2	2	1	1	1	1		2		-
15%	3	3	1	1	1	1		3		-
16%	3	3	1	1	1	1		3		-
17%	3	3	1	1	1	1		3		-
18%	3	3	1	1	1	1		3		-
19%	3	3	1	1	1	1		3		-
20%	3	4	2	2	2	2		4		-
21%	3	4	2	2	2	2		4		-
22%	3	4	2	2	2	2		4		-
23%	3	4	2	2	2	2		4		-
24%	3	4	2	2	2	2		4		-
25%	3	5	2	2	2	2		5		-
26%	3	5	2	2	2	2		5		1
27%	3	5	2	2	2	2		5		1
28%	3	5	2	2	2	2		5		1
29%	3	5	2	2	2	2		5		1
30%	3	5	3	3	3	3		5		1
31%	3	5	3	3	3	3		5		1
32%	3	5	3	3	3	3		5		1
33%	3	5	3	3	3	3		5		1
34%	3	5	3	3	3	3		5		1
35%	3	5	3	3	3	3		5		1
36%	3	5	3	3	3	3		5		2
37%	3	5	3	3	3	3		5		2
38%	3	5	3	3	3	3		5		2
39%	3	5	3	3	3	3		5		2
40%	3	5	3	4	3	4		5		2
41%	3	5	3	4	3	4		5		2
42%	3	5	3	4	3	4		5		2
43%	3	5	3	4	3	4		5		2
44%	3	5	3	4	3	4		5		2
45%	3	5	3	4	3	4		5		2
46%	3	5	3	4	3	4		5		3
47%	3	5	3	4	3	4		5		3
48%	3	5	3	4	3	4		5		3
49%	3	5	3	4	3	4		5		3
50%	3	5	3	5	3	5		5		3
51%	3	5	3	5	3	5		5		3
52%	3	5	3	5	3	5		5		3
53%	3	5	3	5	3	5		5		3
54%	3	5	3	5	3	5		5		3
55%	3	5	3	5	3	5		5		3