Appendix I1
Vehicle Miles Traveled Analysis

Olive Park Apartments (290 Homes)
100% Affordable Housing Project (D24-00006)
Western Terminus of Olive Drive
City of Oceanside
May 20, 2024

Draft Vehicle Miles Traveled Analysis

Prepared by:

LOS Engineering, Inc.
11622 El Camino Real Suite 100 San Diego, CA 92130
Phone 619-890-1253

Job #2401

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1.0 Introduction

The project is located at the western terminus of Olive Dr west of College Blvd in Oceanside, California. The project site is vacant. The 100% affordable housing project includes a total of up to 290 apartments across two buildings, an open space area that will be maintained and managed by the project that will include an all-weather accessible pedestrian/bicycle connection to the adjacent Sprinter rail transit station. This connection will also be available for use by neighboring residents.

The general location of the project is shown in **Figure 1**. A site plan is shown in **Figure 2**.

This report includes a Vehicle Miles Traveled (VMT) analysis to determine if there is a potential California Environmental Quality Act (CEQA) VMT transportation impact.

Figure 1: Project Location

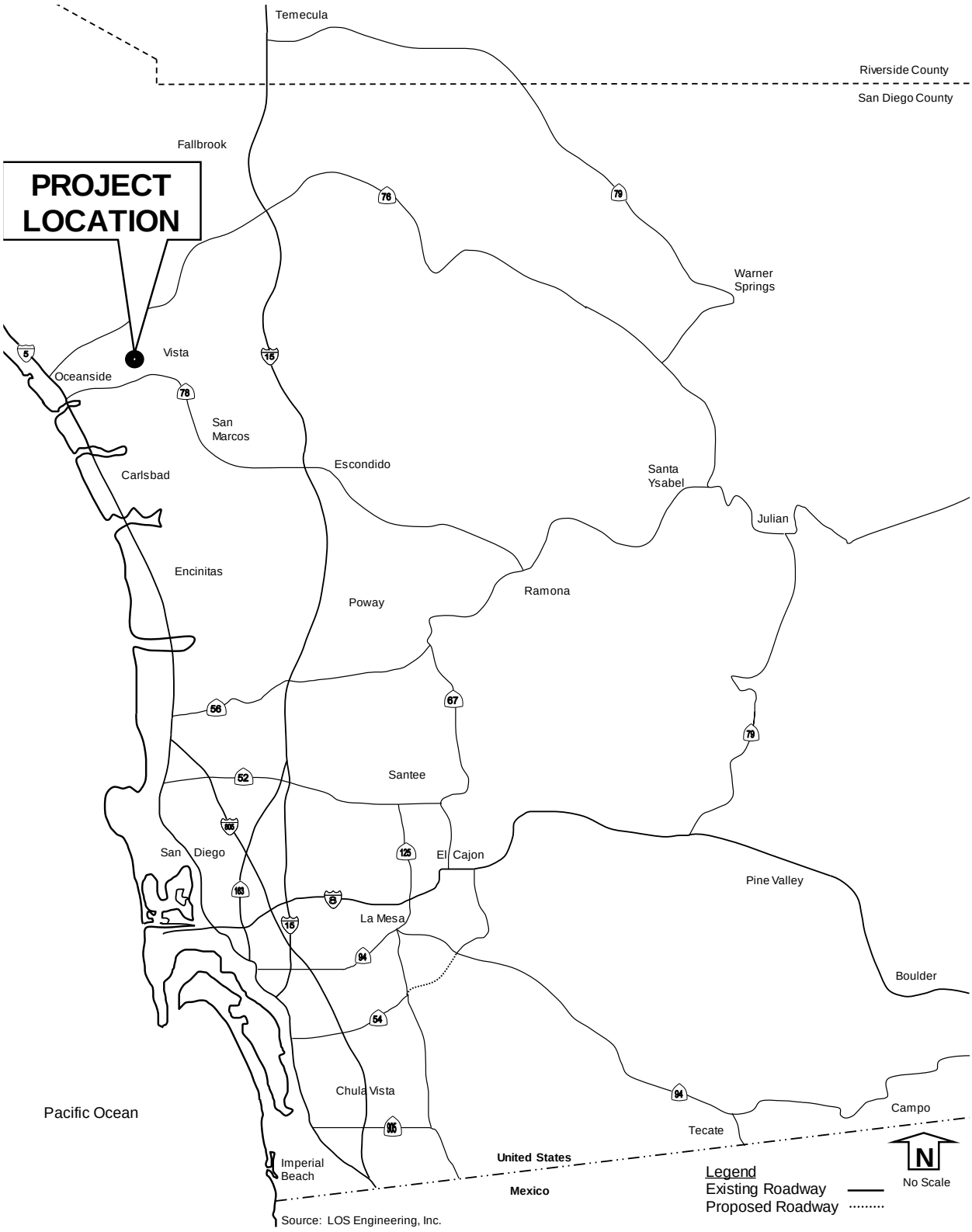
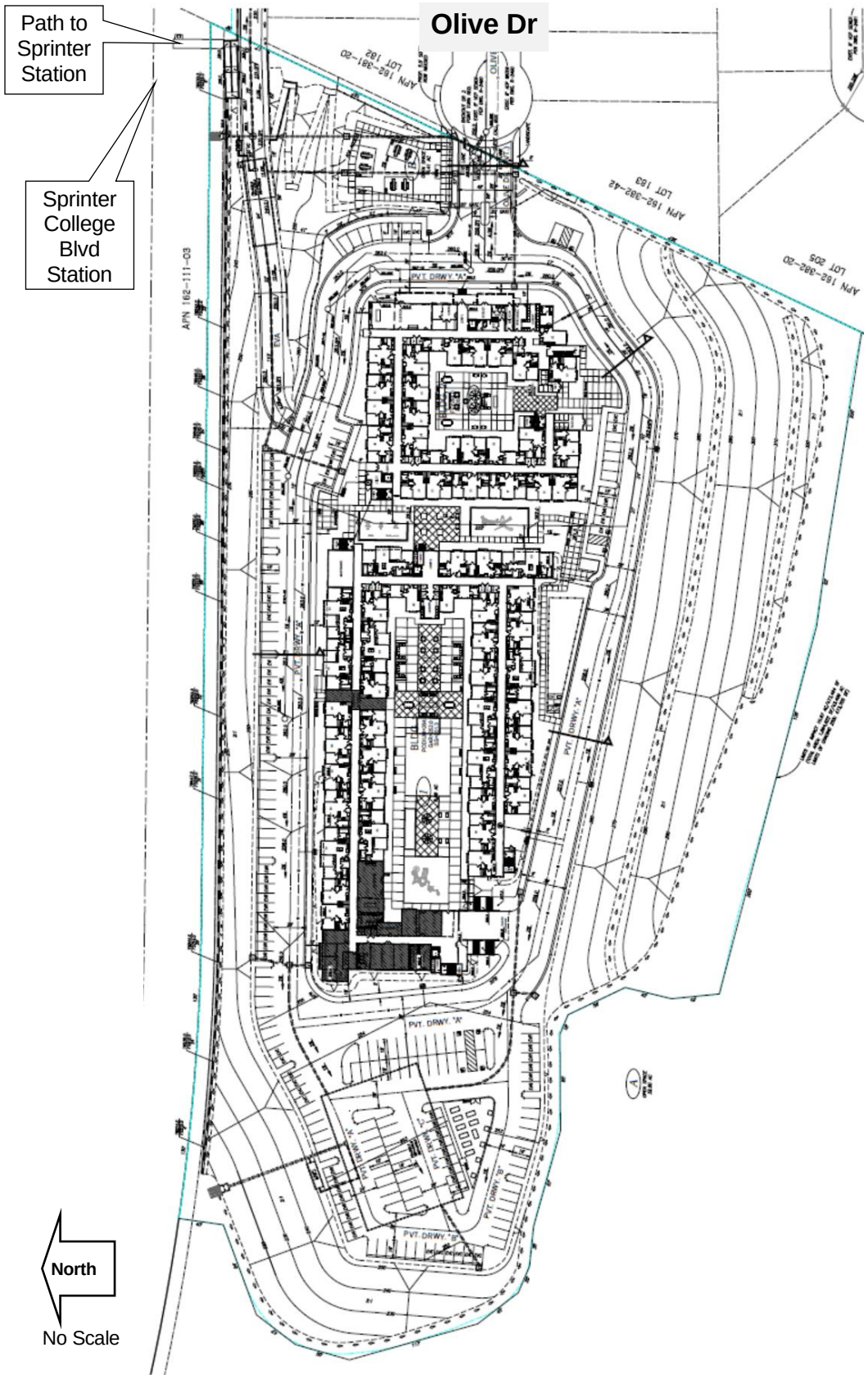


Figure 2: Site Plan



2.0 Vehicle Miles Traveled

A VMT analysis is required to satisfy the CEQA guidelines that utilize VMT as the measure of effectiveness for determining transportation impacts. The California Governor's Office of Planning and Research (OPR) Technical Advisory developed guidance on implementing Senate Bill 743 (SB 743) that shifts the transportation impact measure of effectiveness from Level of Service (LOS) to VMT. The OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 states on page 8 "As noted above, lead agencies have the discretion to set or apply their own thresholds of significance". Excerpts from the OPR Technical Advisory are included in **Appendix A**.

The City of Oceanside *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020 has identified several project types that are presumed to be considered VMT reducing projects as documented in **Appendix B**:

> "The projects listed are either locally serving or are based on substantial evidence provided by the OPR Technical Advisory Committee supporting SR 743 implementation."

The list of screened out projects is shown in **Table 1**. The project satisfies two of the criteria resulting in a VMT reducing project:

1) The project is consistent with the General Plan, located in a Transit Priority Area, and will include a pedestrian connection to a rail transit station stop (the adjacent Sprinter station) that will provide a walking distance of less than ½ mile; therefore, the project is a VMT reducing project and further VMT Analysis is not required. A copy of the Transit Priority Area map is included in **Appendix C**.

2) The project is a 100% affordable housing project therefore, the project is a VMT reducing project and further VMT Analysis is not required.

TABLE 1: CITY OF OCEANSIDE VMT SCREENED OUT PROJECT LIST

Project Type
Projects located in a Transit Priority Areas (TPA) or Smart Growth Opportunity Area as identified in the most recent SANDAG San Diego Forward Regional Plan and is consistent with the General Plan at the time of project application (1) (2).
Projects located in a low-VMT generating area identified on the most recent SANDAG SB 743 VMT Screening map
Locally serving K-12 schools
Day care centers
Local parks
Locally serving retail uses less than 50,000 square feet, including: gas stations, banks, restaurants, grocery stores, and shopping centers
Community institutions (Public libraries, fire stations, local government)
Locally serving hotels (e.g. non-destination hotels, non-regionally serving)
Student housing projects on or adjacent to college campuses
Local serving community colleges that are consistent with the assumptions noted in the most recent SANDAG Regional Transportation Plan/Sustainable Communities Strategy
Affordable housing projects (3)
Assisted living facilities
Senior housing (as defined by HUD)
Transit projects
Bike projects
Pedestrian projects
Safety improvement projects (e.g. RRFBs and high visibility crosswalks at uncontrolled locations, pedestrian count down timers, additionally projects identified through the Highway Safety Improvement Program)
Safe Routes to School
Projects generating less than 500 daily vehicle trips (if inconsistent with adopted General Plan)
Projects generating less than 1,000 daily vehicle trips (if consistent with adopted General Plan)

Source: City of Oceanside *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020

(1) Projects located in a TPA must be able to access the transit station within a ½ mile walking distance or 6 minute walk continuously without discontinuity of sidewalk or obstructions to the route. Qualifying transit stops means a site containing an existing rail transit station served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (OPR, 2017). A high-quality transit corridor may also be considered if a corridor with fixed route bus service has service intervals no longer than 15 minutes during peak commute hours (OPR, 2017).

(2) Smart Growth Opportunity Area Map is provided in Appendix B [to the City's VMT and LOS Assessment]. The most recent version available shall be used.

(3) If a project is a mix of affordable housing and market rate housing or unscreened use, only the affordable housing component would qualify as screened out. Additionally, any removal of affordable housing automatically requires CEQA VMT analysis.

3.0 Project Information Form

The City of Oceanside has developed a Project Information Form (PIF) to facilitate the screening of project requirements. A completed City PIF for this project is included in **Appendix D**.

4.0 Conclusion

The project is located at the western terminus of Olive Dr west of College Blvd in Oceanside, California. The project site is vacant. The 100% affordable housing project includes a total of up to 290 apartments across two buildings, an open space area that will be maintained and managed by the project that will include an all-weather accessible pedestrian/bicycle connection to the adjacent Sprinter rail transit station.

This VMT analysis was based on guidance from the Governor's OPR Technical Advisory and the City of Oceanside *Draft Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020. OPR developed guidance for implementing Senate Bill 743 (SB 743) requirements that shifts the transportation impact measure of effectiveness from Level of Service (LOS) to VMT.

The City of Oceanside *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled (VMT) and Level of Service Assessment*, August 2020 has identified several project types that are presumed to be considered VMT reducing projects. The project satisfies two of the criteria resulting in a VMT reducing project:

1) The project is consistent with the General Plan, located in a Transit Priority Area, and will include a pedestrian connection to a rail transit station stop (the adjacent Sprinter station) that will provide a walking distance of less than ½ mile; therefore, the project is a VMT reducing project and further VMT Analysis is not required.

2) The project is a 100% affordable housing project therefore, the project is a VMT reducing project and further VMT Analysis is not required.

# # #

Appendix A

Excerpts from OPR Technical Advisory

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA

December 2018

D. General Principles to Guide Consideration of VMT

SB 743 directs OPR to establish specific "criteria for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

To assist in the determination of significance, many lead agencies rely on "thresholds of significance." The CEQA Guidelines define a "threshold of significance" to mean "an identifiable **quantitative, qualitative[12] or performance level** of a particular environmental effect, non-compliance with which means the effect will ***normally*** be determined to be significant by the agency and compliance with which means the effect ***normally*** will be determined to be less than significant." (CEQA Guidelines, § 15064.7, subd. (a) (emphasis added).) Lead agencies have discretion to develop and adopt their own, or rely on thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (*Id*. at subd. (c); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (*Id*. at § 15384 (emphasis added); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-1109.)

Additionally, the analysis leading to the determination of significance need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy**, **completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines, § 15151 (emphasis added).)

These general principles guide OPR's recommendations regarding thresholds of significance for VMT set forth below.

[12] Generally, qualitative analyses should only be conducted when methods do not exist for undertaking a quantitative analysis.

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance. (*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own

The VMT metric can support the three statutory goals: "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, ***and*** a diversity of land uses." (Pub. Resources Code, § 21099, subd. (b)(1), emphasis added.) However, in order for it to promote and support all three, lead agencies should select a significance threshold that aligns with state law on all three. State law concerning the development of multimodal transportation networks and diversity of land uses requires planning for and prioritizing increases in complete streets and infill development, but does not mandate a particular depth of implementation that could translate into a particular threshold of significance. Meanwhile, the State has clear quantitative targets for GHG emissions reduction set forth in law and based on scientific consensus, and the depth of VMT reduction needed to achieve those targets has been quantified. Tying VMT thresholds to GHG reduction also supports the two other statutory goals. Therefore, to ensure adequate analysis of transportation impacts, OPR recommends using quantitative VMT thresholds linked to GHG reduction targets when methods exist to do so.

Various legislative mandates and state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 (2006) requires statewide GHG emissions reductions to 1990 levels by 2020 and continued reductions beyond 2020.

- Senate Bill 32 (2016) requires at least a 40 percent reduction in GHG emissions from 1990 levels by 2030.

- Pursuant to Senate Bill 375 (2008), the California Air Resources Board GHG emissions reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies (RTP/SCS). Current targets for the State's largest MPOs call for a 19 percent reduction in GHG emissions from cars and light trucks from 2005 emissions levels by 2035.

- Executive Order B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.

Appendix B

Excerpts from City of Oceanside VMT and LOS Guidelines

City of Oceanside

Traffic Impact Analysis Guidelines for

Vehicle Miles Traveled (VMT) and Level of Service Assessment

August 2020
Final Version

Trip Distribution / Assignment Procedure

Typically, two methods are used to determine trip distribution and assignment for transportation analysis and are considered acceptable by the City.

- The first method utilizes engineering judgement based on existing traffic data and land use patterns. This method requires the consultant to provide a map with project distribution and trip assignments to the City for review prior to conducting analysis.

- The second method utilizes the SANDAG Regional Travel Demand Model to perform a select zone or link analysis**. This approach is typically used for larger projects and shall be used for any project that generates over 2,400 ADT**.

Once trip distribution and assignment assumptions are submitted to the City, the City will review and provide feedback on assumptions. If necessary, the developer or consultant may coordinate with the City Traffic Engineer to discuss trip distribution and assignment for any clarification or considerations to travel patterns that are not readily apparent.

7.0 Screened Out Projects

SB 743 eliminates the need for some projects to be analyzed for CEQA purposes that support VMT reduction, these projects are considered screened out for VMT analysis. Screened out is defined as projects not needed to be analyzed for CEQA purposes that already support VMT reduction.

The projects listed in **Table 2** are presumed to be considered VMT-reducing projects. The projects listed are either locally serving or are based on substantial evidence provided by the OPR Technical Advisory Committee supporting SB 743 implementation. A project may be required to conduct a VMT analysis at the discretion of City Staff if it is unclear the project qualifies as screened out or based on the City Traffic Engineer's discretion.

Table 2 – Screened Out Projects

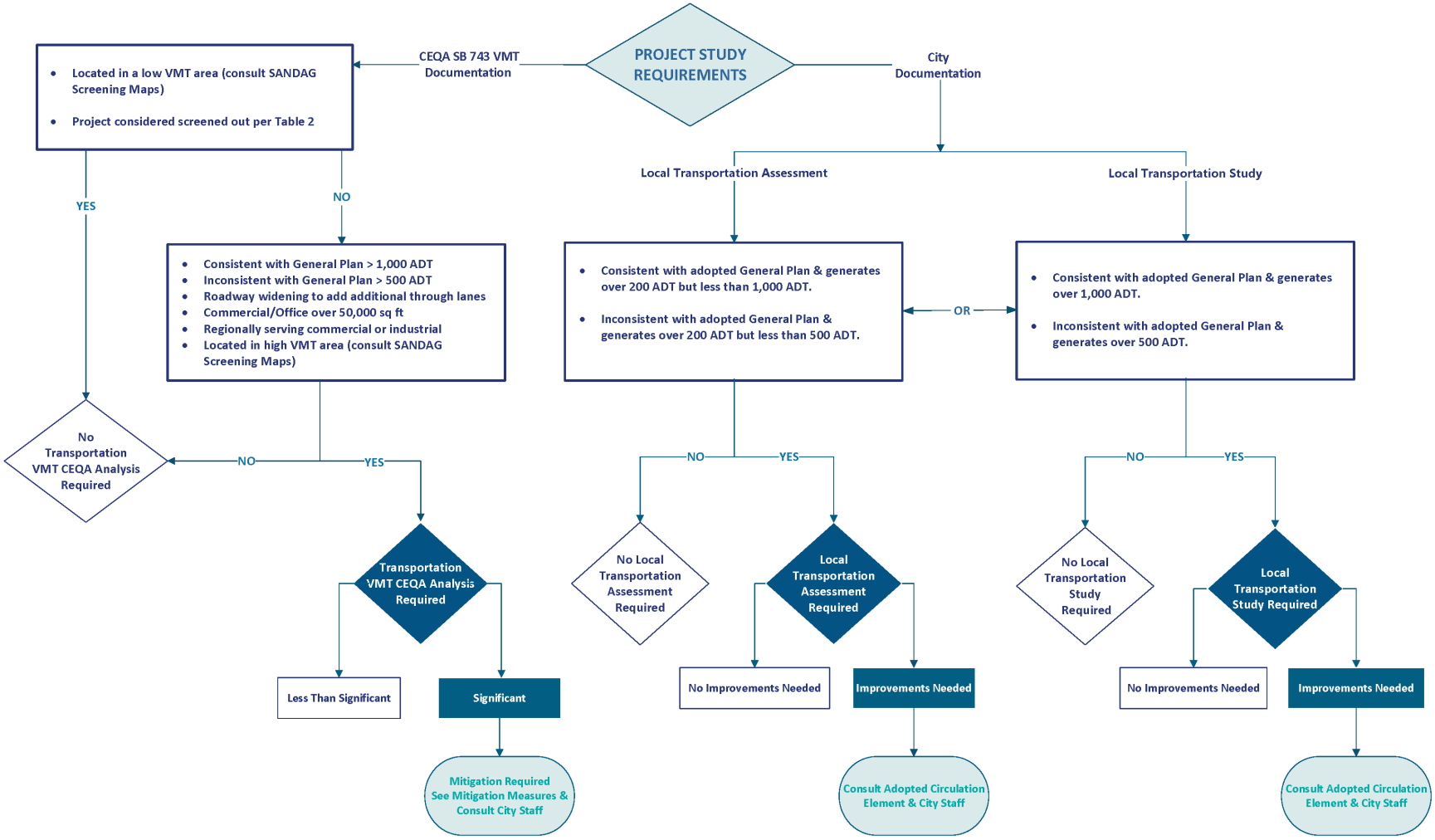
Project Type
Projects located in a Transit Priority Areas (TPA) or Smart Growth Opportunity Area as identified in the most recent SANDAG San Diego Forward Regional Plan and is consistent with the General Plan at the time of project application. (1)(2)
Projects located in a low-VMT generating area identified on the most recent SANDAG SB 743 VMT Screening map
Locally serving K-12 schools
Day care centers
Local parks
Locally serving retail uses less than 50,000 square feet, including: gas stations, banks, restaurants, grocery stores, and shopping centers
Community institutions (Public libraries, fire stations, local government)
Locally serving hotels (e.g. non-destination hotels, non-regionally serving)
Student housing projects on or adjacent to college campuses
Local serving community colleges that are consistent with the assumptions noted in the most recent SANDAG Regional Transportation Plan/Sustainable Communities Strategy
Affordable housing projects (3)
Assisted living facilities
Senior housing (as defined by HUD)
Transit projects
Bike projects
Pedestrian projects
Safety improvement projects (e.g. RRFBs and high visibility crosswalks at uncontrolled locations, pedestrian count down timers, additionally projects identified through the Highway Safety Improvement Program)
Safe Routes to School
Projects generating less than 500 daily vehicle trips (if inconsistent with adopted General Plan)
Projects generating less than 1,000 daily vehicle trips (if consistent with adopted General Plan)

(1) Projects located in a TPA must be able to access the transit station within a ½ mile walking distance or 6 minute walk continuously without discontinuity of sidewalk or obstructions to the route. Qualifying transit stops means a site containing an existing rail transit station served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (OPR, 2017). A high-quality transit corridor may also be considered if a corridor with fixed route bus service has service intervals no longer than 15 minutes during peak commute hours (OPR, 2017).
(2) Smart Growth Opportunity Area Map is provided in **Appendix B**. The most recent version available shall be used.
(3) If a project is a mix of affordable housing and market rate housing or unscreened use, only the affordable housing component would qualify as screened out. Additionally, any removal of affordable housing automatically requires CEQA VMT analysis.

8.0 Determining Project Study Requirements

Figure 8-1 helps guide development projects in determining the requirements from a local and state perspective in order to help determine study requirements. The screening flowchart indicates an overview of the circumstances where a detailed CEQA VMT analysis would or would not be required and when a project would require a Local Transportation Study or Local Transportation Assessment. The City maintains the discretion to require a project to conduct additional analysis if needed.

Figure 8-1 Project Study Requirements



* Projects are not confined to what is listed above and will need to be coordinated with City Staff to determine study requirements for developments not listed.
This flowchart is a generalization, it is up to the City's discretion to determine if additional analyses will be required and if potential mitigation or improvements are acceptable.

13.0 RESOURCES

The following resources were used in the development of these guidelines. It is recommended the consultant develop a plan of action that aligns with the City Traffic Engineer's expectation prior to conducting any analyses.

City of San Diego. "Transportation Study Manual (TSM) Draft." September 2019.

Institute of Transportation Engineers (San Diego Section). " Guidelines for Transportation Impact Studies (TIS) in the San Diego Region." May 2019. Accessed April 1, 2020.

Governor's Office of Planning and Research (OPR). "Technical Advisory on Evaluating Transportation Impacts in CEQA." December 2018. Accessed April 1, 2020.

Governor's Office of Planning and Research (OPR). "Key Resources on SB 743: Studies, Reports, Briefs, and Tools." April 2018. Accessed April 1, 2020.

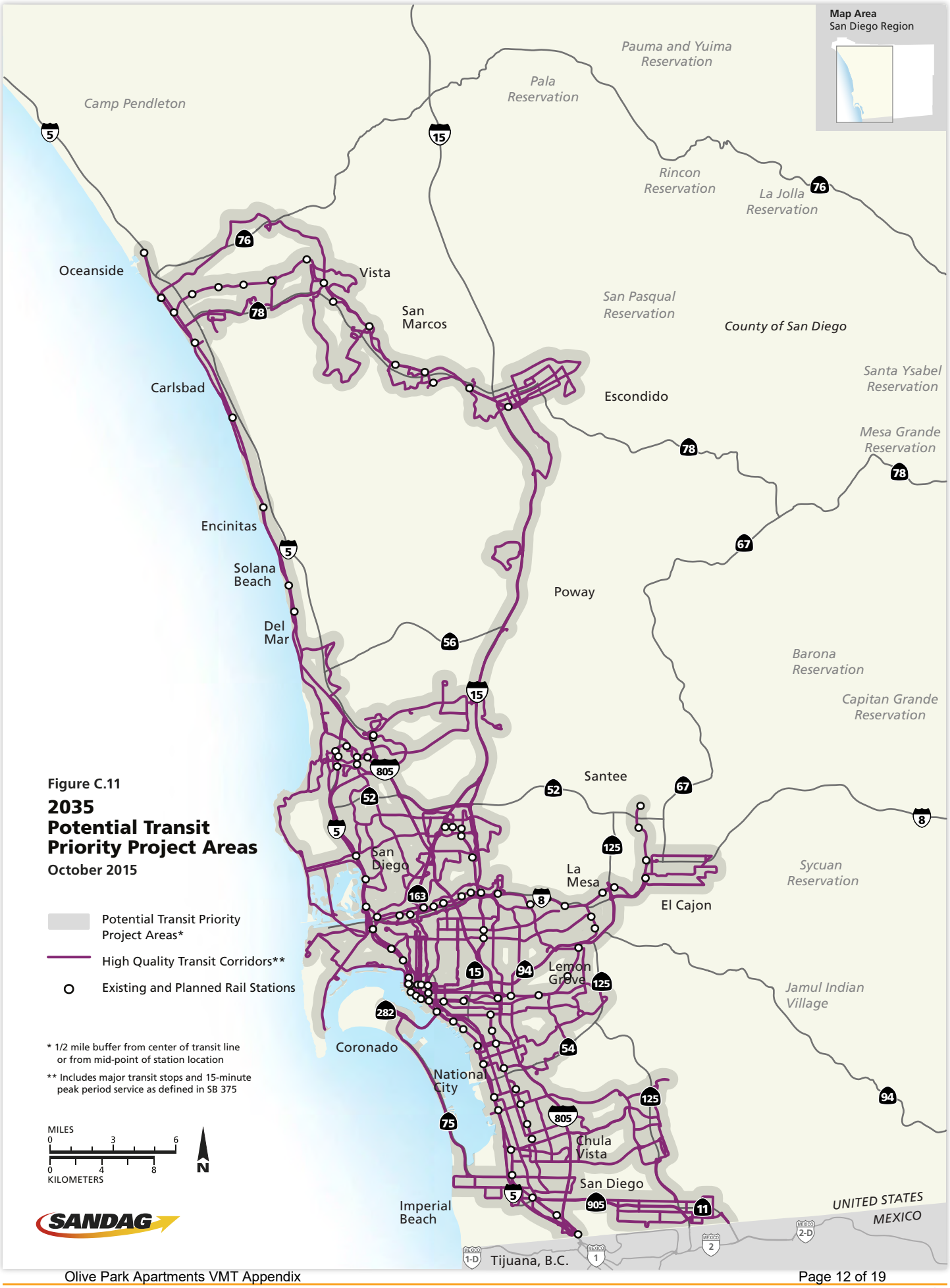
California Air Resources Board (CARB). "2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals." January 2019. Accessed April 1, 2020.

California Air Pollution Control Officers Association (CAPCOA). "Quantifying Greenhouse Gas Mitigation Measures." August 2010. Accessed April 1, 2020.

San Diego Association of Governments (SANDAG). "TDM Planning Resources." 2019. Accessed April 1, 2020.

Appendix C

Transit Priority Area Map


Map Area
San Diego Region
Camp Pendleton
Pauma and Yuima Reservation
Pala Reservation
Rincon Reservation
La Jolla Reservation
Oceanside
Vista
San Marcos
San Pasqual Reservation
County of San Diego
Carlsbad
Escondido
Santa Ysabel Reservation
Mesa Grande Reservation
Encinitas
Solana Beach
Del Mar
Poway
Barona Reservation
Capitan Grande Reservation
Santee
Sycuan Reservation
San Diego
La Mesa
El Cajon
Lemon Grove
Jamul Indian Village
Coronado
National City
Chula Vista
San Diego
Imperial Beach
UNITED STATES
MEXICO
Tijuana, B.C.
Figure C.11
2035
Potential Transit Priority Project Areas
October 2015
Potential Transit Priority Project Areas*
High Quality Transit Corridors**
Existing and Planned Rail Stations
* 1/2 mile buffer from center of transit line or from mid-point of station location
** Includes major transit stops and 15-minute peak period service as defined in SB 375
MILES
0 3 6
0 4 8
KILOMETERS
N
SANDAG

Appendix D

City of Oceanside Project Information Form

PROJECT INFORMATION FORM (PIF)

THE FOLLOWING IS TO BE COMPLETED BY THE PROJECT APPLICANT:

PROJECT INFORMATION FORM			
1.	**PROJECT DESCRIPTION:** Olive Park Apts		
2.	**PROJECT LOCATION:** Western terminus of Olive Drive, west of College Blvd		
3.	**LAND USE:** 290 Multi-Famliy Units **SIZE/DENSITY:** 8.27 du/acre (290 du/35.06 acres)		
4.	**ZONING AND LAND USE CONSISTENT WITH ADOPTED GENERAL PLAN?**	☑ Yes	☐ No
5.	**PROJECT LOCATED IN TRANSIT PRIORITY AREA[1], SMART GROWTH AREA[2], OR LOW VMT AREA[3]?**	☑ Yes	☐ No
6.	**PROJECT TRIP GENERATION:** 1,378 **ADT**	☐ < 200 ADT ☐ ≥ 200 ADT ☑ ≥ 1,000 ADT ☐ ≥ 2,400 ADT	
	ATTACHMENTS		
A.	**PROJECT LOCATION MAP**	☑ Attached	
B.	**PROJECT TRIP DISTRIBUTION**	☑ Attached	
C.	**PROJECT TRIP ASSIGNMENT**	☑ Attached	

1) Projects located in a TPA must be able to access the transit station within a ½ mile walking distance or 6 minute walk continuously without discontinuity of sidewalk or obstructions to the route. Qualifying transit stops means a site containing an existing rail transit station served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (OPR, 2017). A high-quality transit corridor may also be considered if a corridor with fixed route bus service has service intervals no longer than 15 minutes during peak commute hours (OPR, 2017).
(2) See Appendix B.
(3) Based on the most recent SANDAG SB 743 Screening Map. Example shown in Appendix C.

TO BE COMPLETED BY CITY STAFF AND RETURNED TO PROJECT APPLICANT

PROJECT STUDY REQUIREMENTS				
1)	**Does the project require a CEQA VMT analysis?**	☐ Yes	☑ No	☐ Incomplete[(1)]
	A. If yes, does the project require a SANDAG Model Run?	☐ Yes	☐ No	
2a)	**Does the project require a Local Transportation Study?**	☑ Yes	☐ No	☐ Incomplete[(1)]
	OR			
2b)	**Does the project require a Local Transportation Assessment?**	☐ Yes	☑ No	☐ Incomplete[(1)]

[(1)] Incomplete application or additional information is needed to determine study requirements.

Shannon Vitale — Digitally signed by Shannon Vitale, DN: cn=Shannon Vitale, ou=Building, email=SVitale@oceansideca.org, Date: 2024.02.14 09:35:11 -08'00'

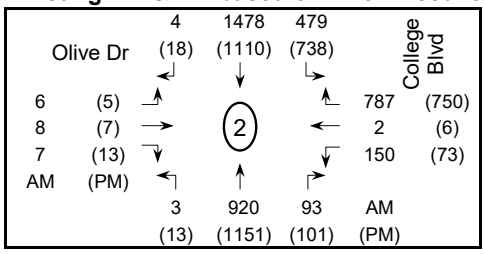
Planning Division Date

Tam Tran — Digitally signed by Tam Tran, DN: cn=Tam Tran, ou=Traffic, email=TTran@oceansideca.org, Date: 2024.02.08 09:51:47 -08'00'

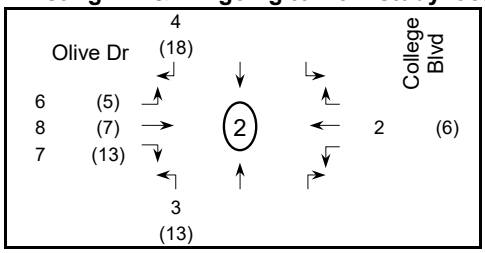
Transportation Engineering Section Date

Distribution based on existing residential traffic using Olive Dr west of College Blvd because the neighborhood is all residential and does not have a secondary access.

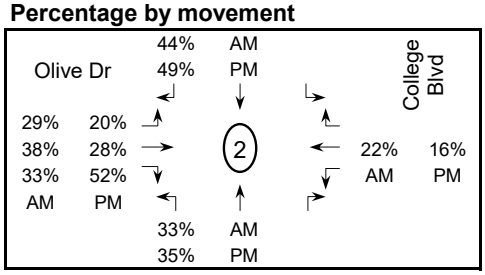
Existing AM & PM based on 1/25/24 count with schools in session



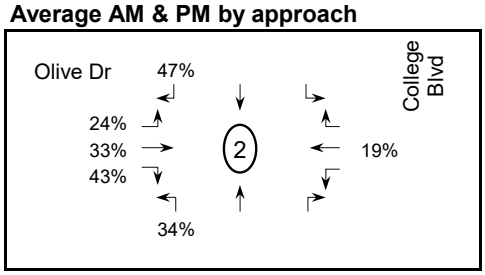
Existing AM & PM going to/from study location



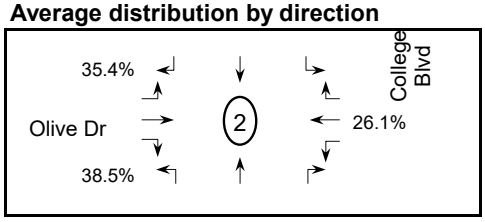
Percentage by movement



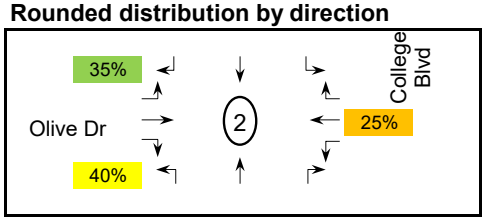
Average AM & PM by approach

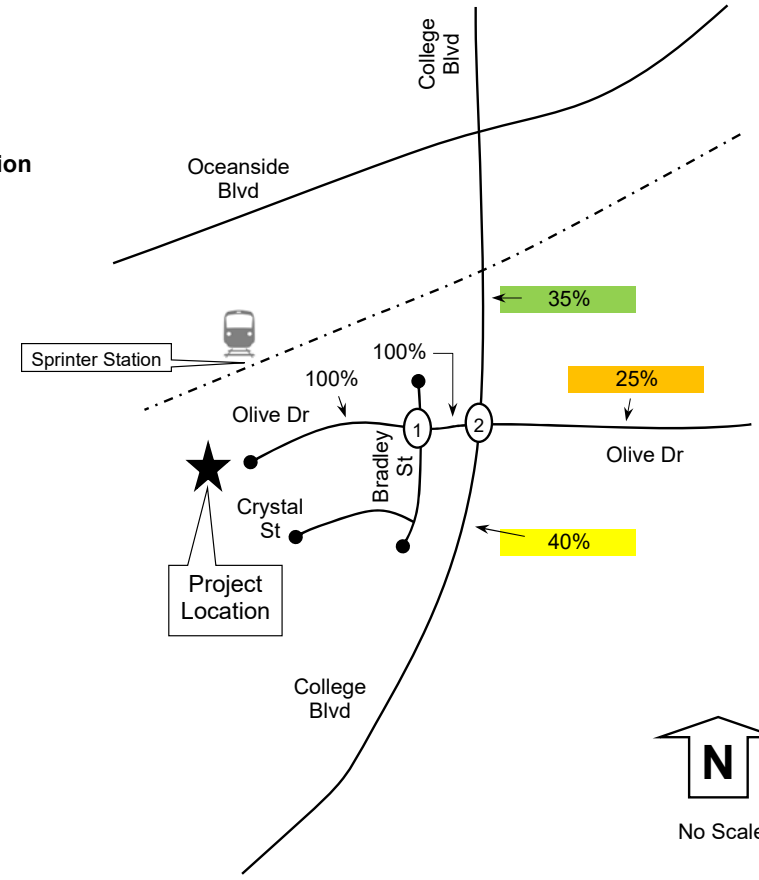


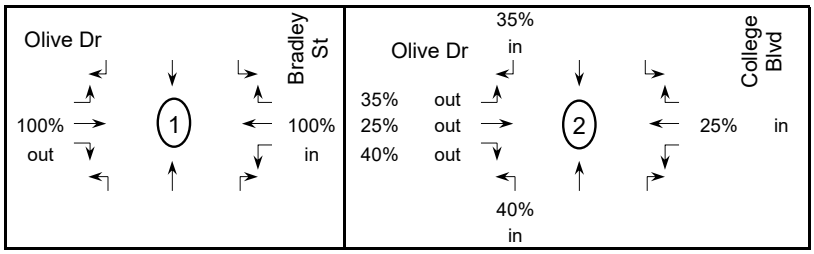
Average distribution by direction



Rounded distribution by direction







Proposed Trip Generation and Assignment

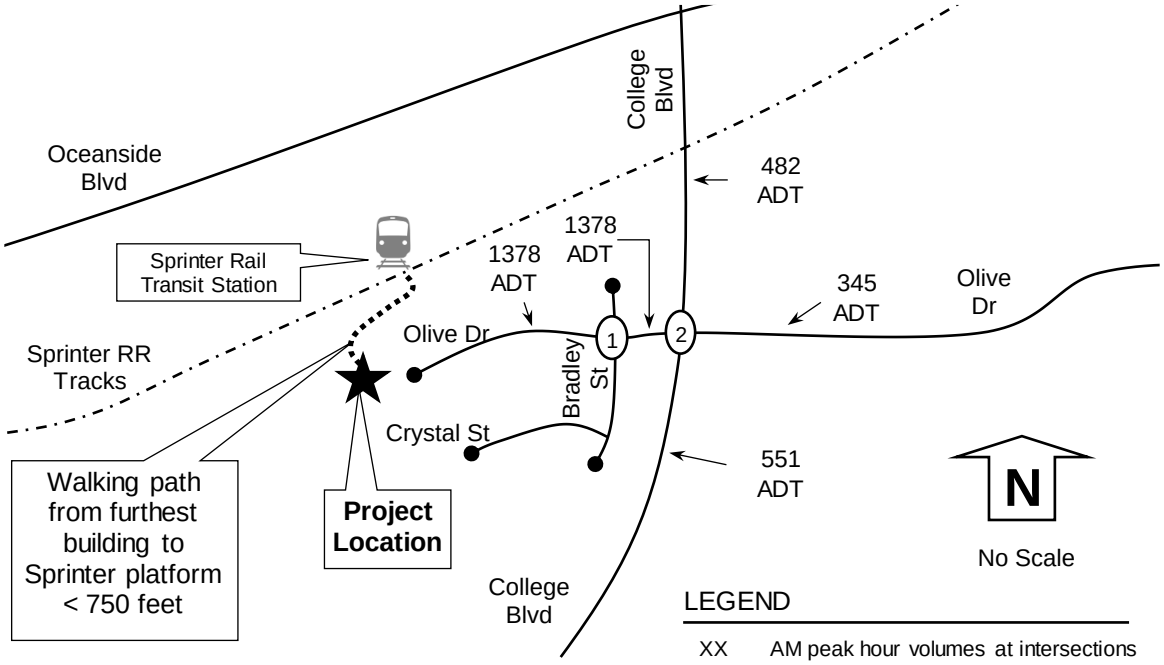
Trip generation is based on most current 11th Edition ITE Trip Generation Manual vs. SANDAG because ITE provides a trip rate that better matches the project details as follows. ITE has a trip rate specifically for multi-family buildings that are between 4 and 10 stories tall AND located within ½ mile of a rail transit station. The project has 4 stories of residential units and has a walkig distance of less than 750 feet to the Sprinter rail transit station. Furthermore, SANDAG trip generation for apartments is from 1979 while ITE data is from the 1990s through 2020s.

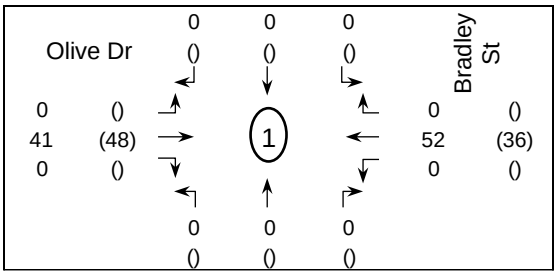
Trip Generation

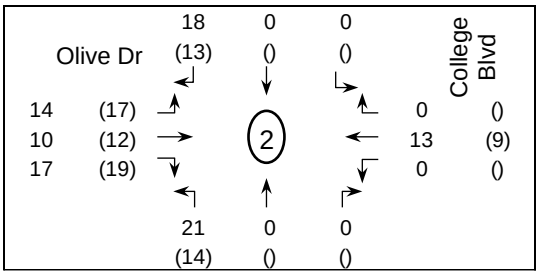
ITE 11th Edition Code and Land Use Description	Rates & Size			*Daily* Trips	AM Peak Hour IN	AM Peak Hour OUT	AM Peak Hour Total	PM Peak Hour IN	PM Peak Hour OUT	PM Peak Hour Total
ITE (221) Weekday Multi-Family	Rates:	4.75	/DU		56%	44%	0.32	43%	57%	0.29
with 4-10 floors close to transit	Size:	290	DU	Trips: **1,378**	52	41	**93**	36	48	**84**

Source: Institute of Transportation Engineers (ITE) 11th Edition *Trip Generation*. Daily: 24 hour traffic.

Trip Assignment







Multifamily Housing (Mid-Rise)
Close to Rail Transit (221)

Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

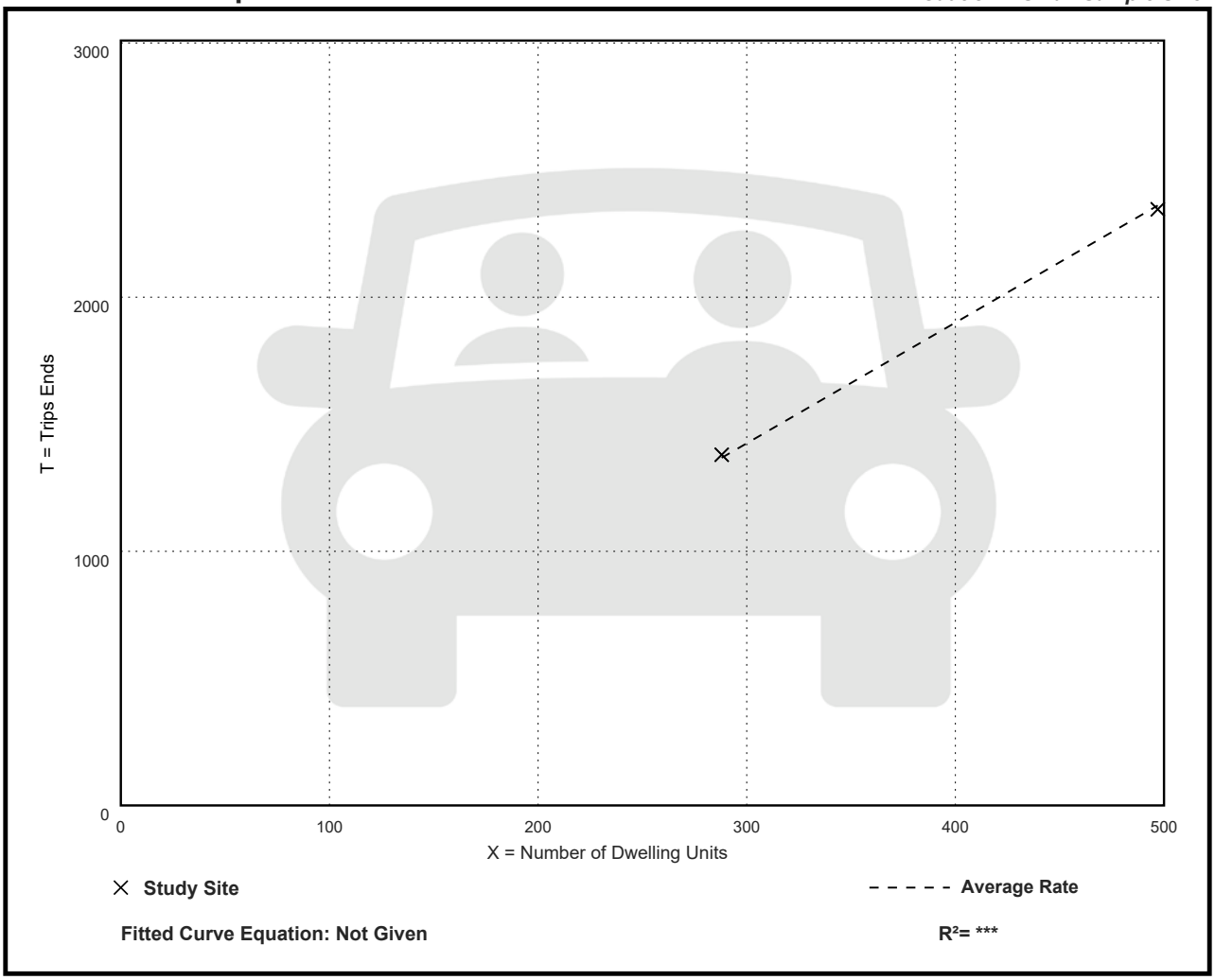
Setting/Location: General Urban/Suburban
Number of Studies: 2
Avg. Num. of Dwelling Units: 393
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
4.75	4.72 - 4.79	***

Data Plot and Equation

Caution – Small Sample Size



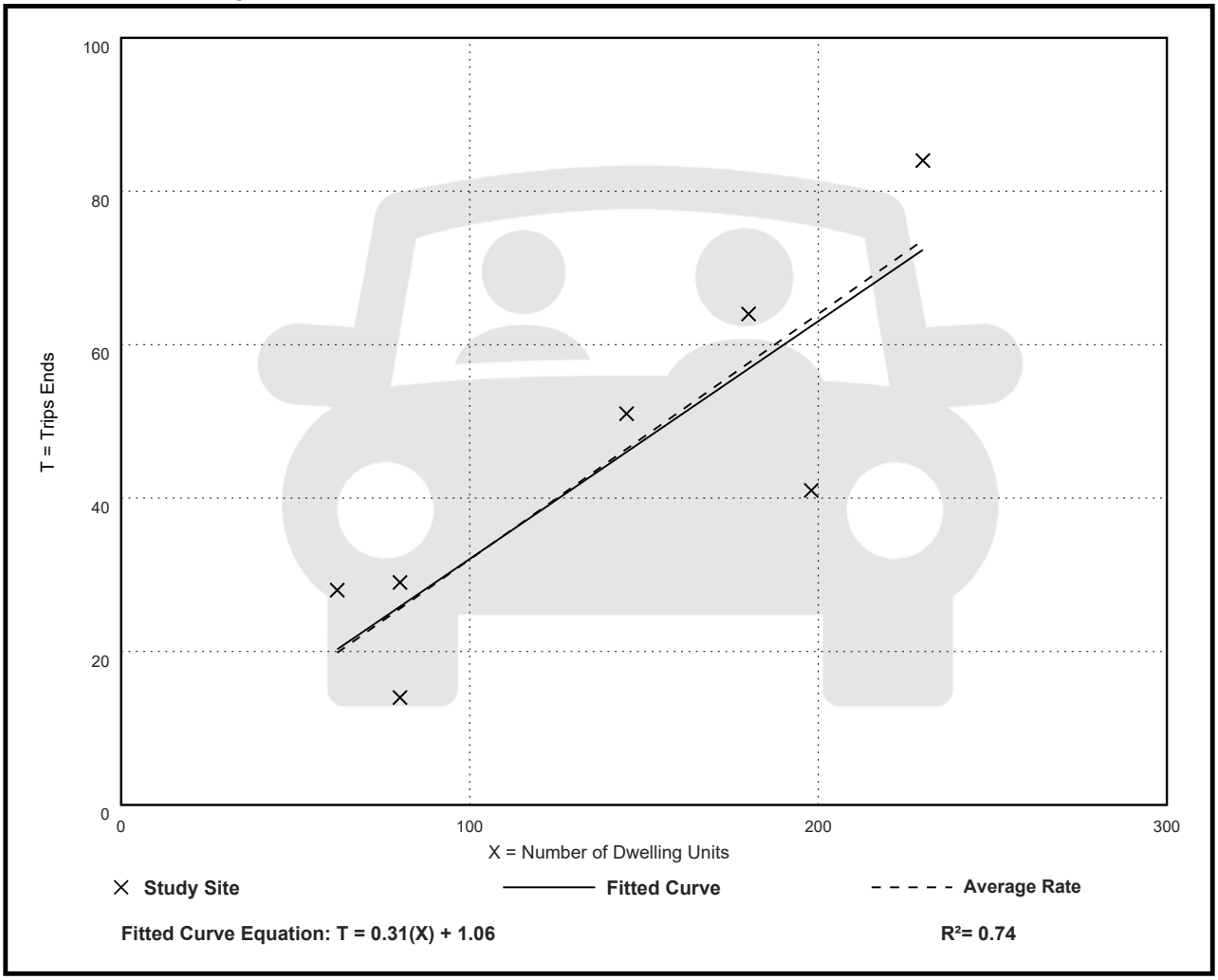
Multifamily Housing (Mid-Rise)
Close to Rail Transit (221)

Vehicle Trip Ends vs: Dwelling Units
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
Number of Studies: 7
Avg. Num. of Dwelling Units: 139
Directional Distribution: 56% entering, 44% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.32	0.18 - 0.45	0.09

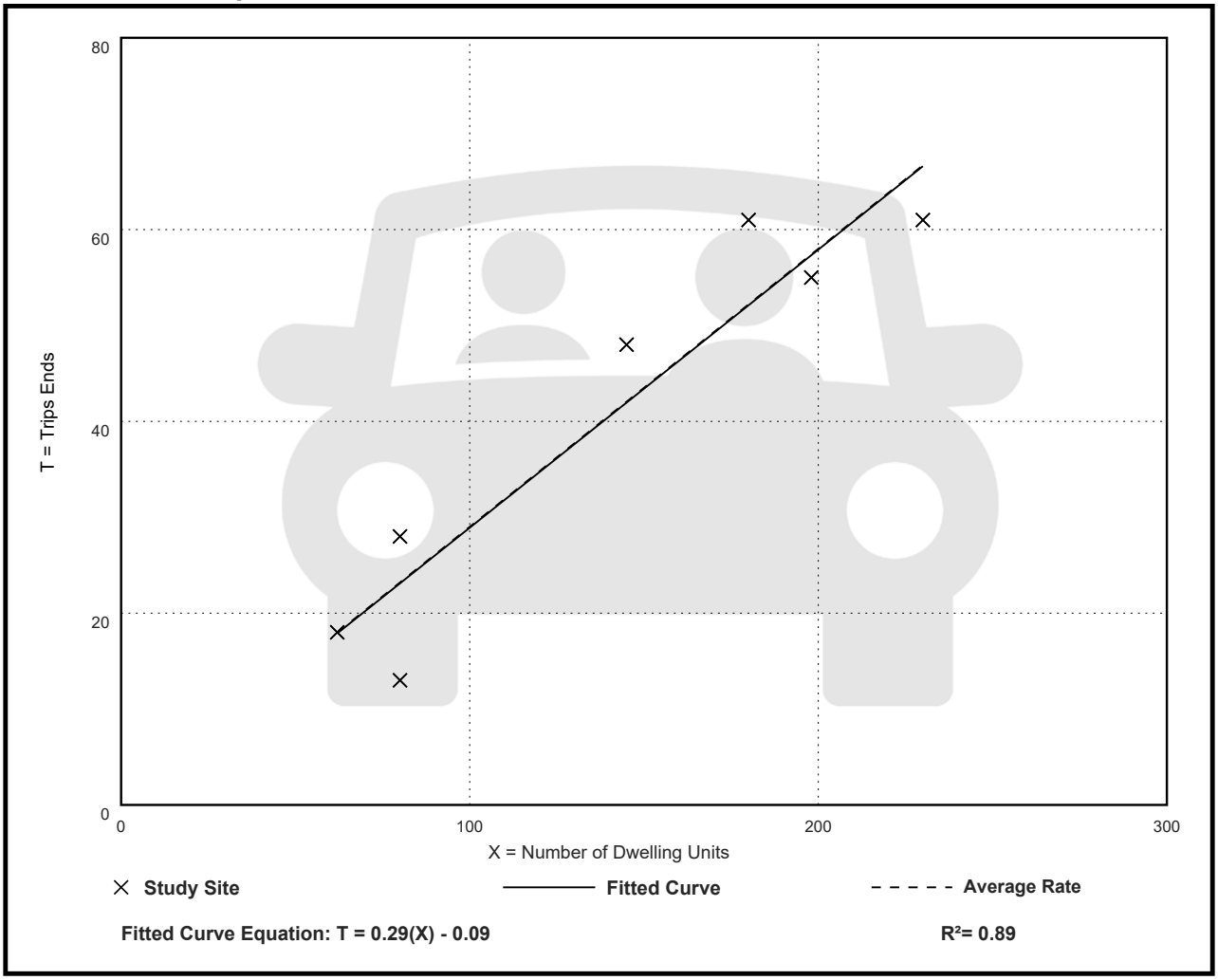
Data Plot and Equation



Multifamily Housing (Mid-Rise)
Close to Rail Transit (221)

Vehicle Trip Ends vs: Dwelling Units
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
Number of Studies: 7
Avg. Num. of Dwelling Units: 139
Directional Distribution: 43% entering, 57% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.29	0.16 - 0.35	0.05

Data Plot and Equation