

Environmental Resource Permitting Advisory Group Meeting

Southwest Florida
Water Management District

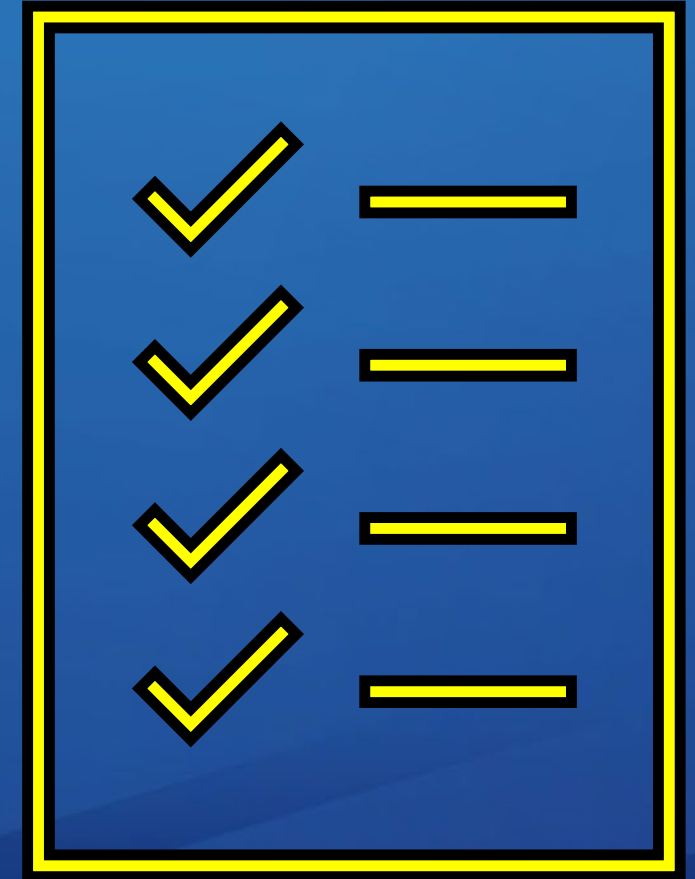


Chris Kuzlo, P.E.
Environmental Resource Permit Bureau

September 16, 2026

Agenda

- Redevelopment exemptions
- Treatment performance standards
- Hydrologic Unit Code (HUC) 12 map
- Determination of applicable standards
- 100-year event retention
- Permit modifications



Redevelopment Definition (Section 2.0(a)96, A.H.V.I)

- “Redevelopment” means the construction on sites having existing commercial, industrial, institutional, roadway, or residential land uses, excluding silviculture or agriculture, where the existing land use has not been previously permitted under Part IV of Chapter 373 F.S., where all or part of the existing impervious surface is removed and replaced with new impervious surface, which has the same or lesser area as the existing impervious surface, and the same or less intense land use, based on respective EMC values.



Redevelopment Exemption (Section 8.3.6, A.H.V.I)

- Redevelopment site cannot be located within a HUC12 subwatershed containing an Impaired Water or Outstanding Florida Water (OFW) and be located upstream of that water.
- Redevelopment site must be under one (1) acre.
- Redevelopment must result in reduced impervious surface or reduced pollutant loading.



Development/redevelopment projects may qualify for an exemption pursuant to Rule 62-330.020 F.A.C. regardless of impervious/semi-impervious area increase or site location. The 4000/9000 impervious/semi-impervious threshold will apply to the total post-development impervious/semi-impervious area.

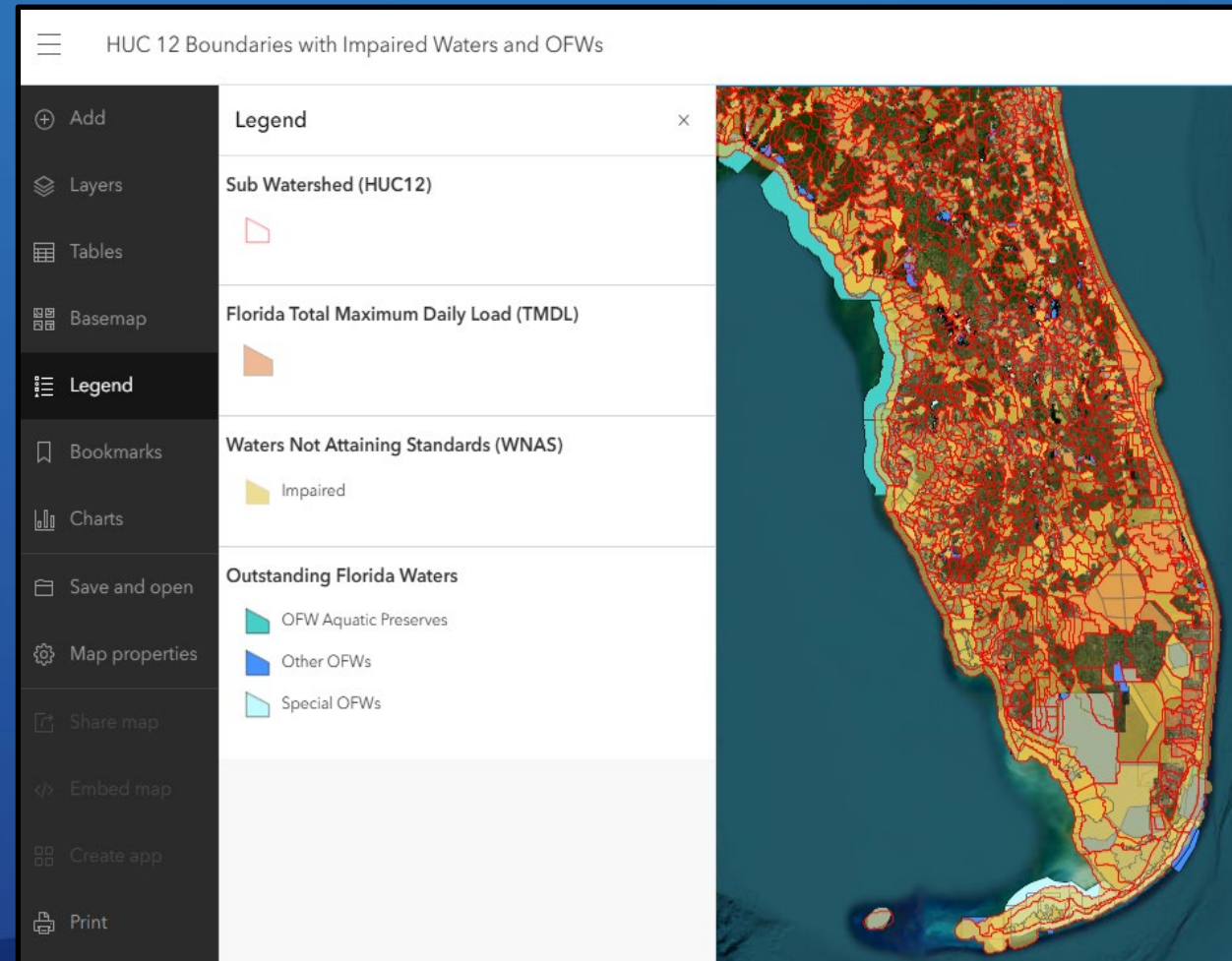
Treatment Performance Standards (Section 8, A.H.V.I)

- Treatment must accomplish **the greater** of the following:
 - The post-development $\leq$ the pre-development (nutrient load)
 - A specific reduction of the post-development nutrient load
- Discharges to **OFWs** and **IWs**:
 - Require a greater reduction of the post-development nutrient load.
- Provide for alternative performance standards for **redevelopment**:
 - Must meet the definition of redevelopment (Section 2.0(a)96, A.H.V.I).

All Sites	OFWs	Impaired Waters	Impaired OFWs	Redevelopment
Post $\leq$ Pre, and TP: 80% & TN: 55%	Post $\leq$ Pre, and TP: 90% & TN: 80%	Post $\leq$ Pre, TP: 80% & TN: 80%, and Post < Pre (Impaired Parameters)	Post $\leq$ Pre, TP: 95% & TN: 95%, and Post < Pre (Impaired Parameters)	TP: 80% & TN: 45% or TP: 90% & TN: 60% (for OFWs) and Post < Pre (Impaired Parameters)
TSS: 80%	TSS: 95%	TSS: 80%	TSS: 95%	

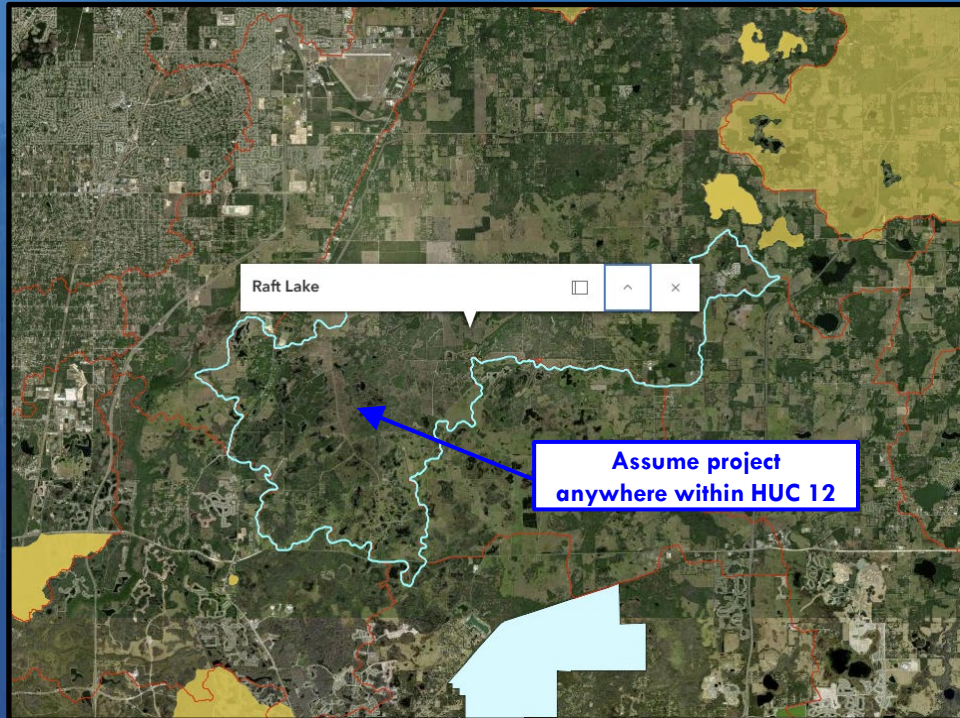
HUC 12 FDEP Map

- The Florida Department of Environmental Protection (FDEP) provides an online map that can be used to determine the applicable performance standards.
- Please contact the FDEP regarding any mapping questions or suspected issues.



<https://floridadep.gov/water/engineering-hydrology-geology/content/erp-stormwater-resource-center>

Determination of Applicable Standards

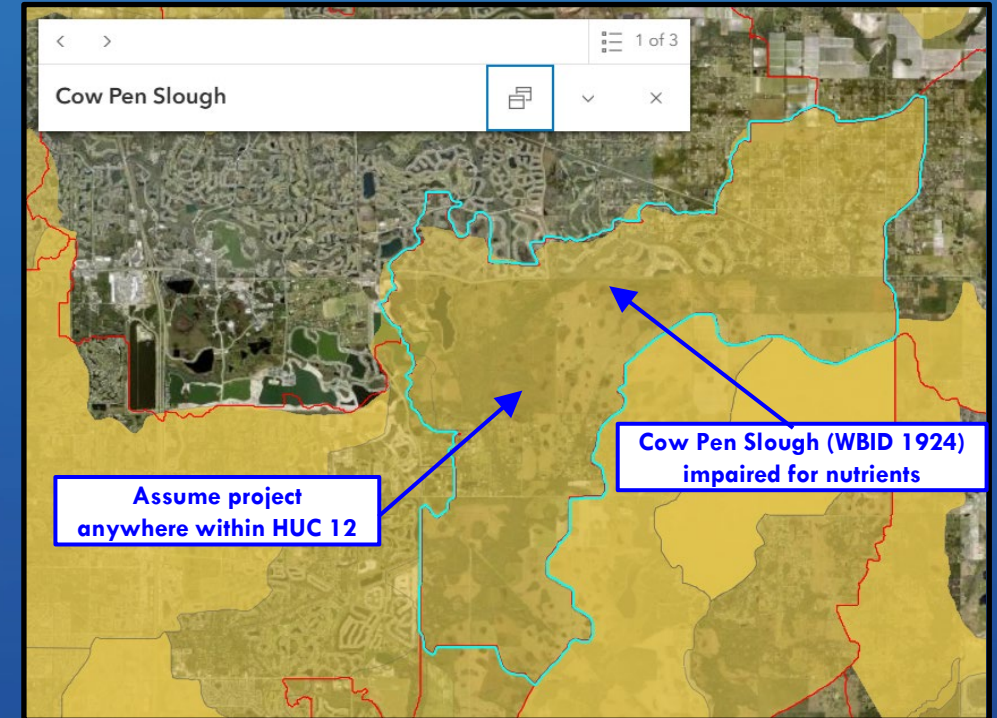


Treatment to accomplish the greater of:

- The post-dev. $\leq$ the pre-dev. (nutrient load)
- A reduction of the post-dev. nutrient load for

All Sites criteria:

- **TP reduction: 80%**
- **TN reduction: 55%**



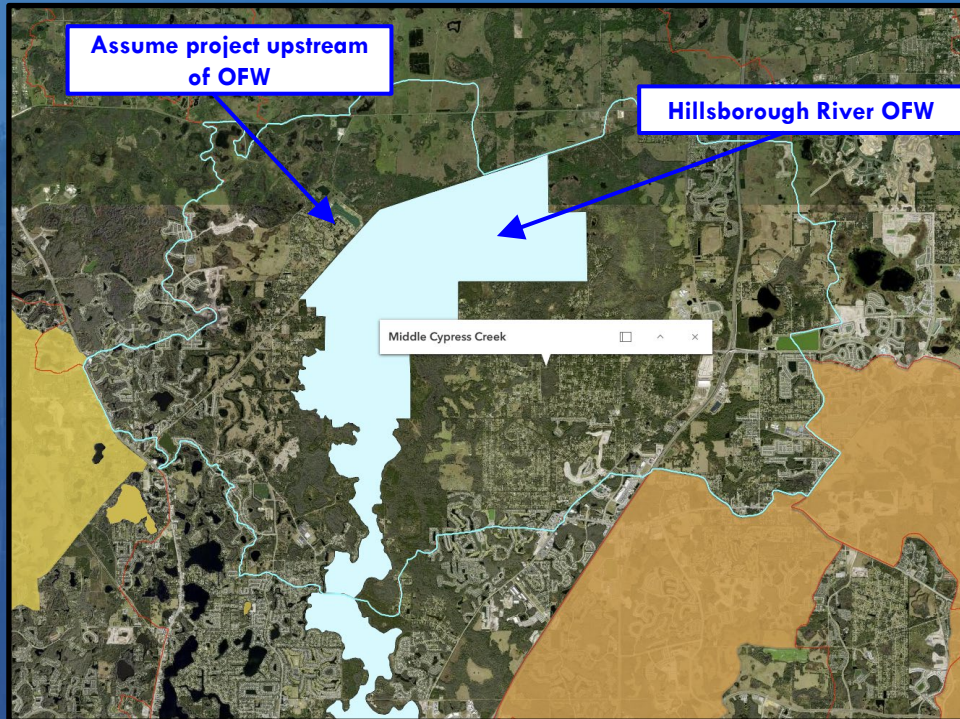
Treatment to accomplish the greater of:

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- A reduction of the post-dev. nutrient load for

Impaired Waters criteria:

- **TP reduction: 80%**
- **TN reduction: 80%**

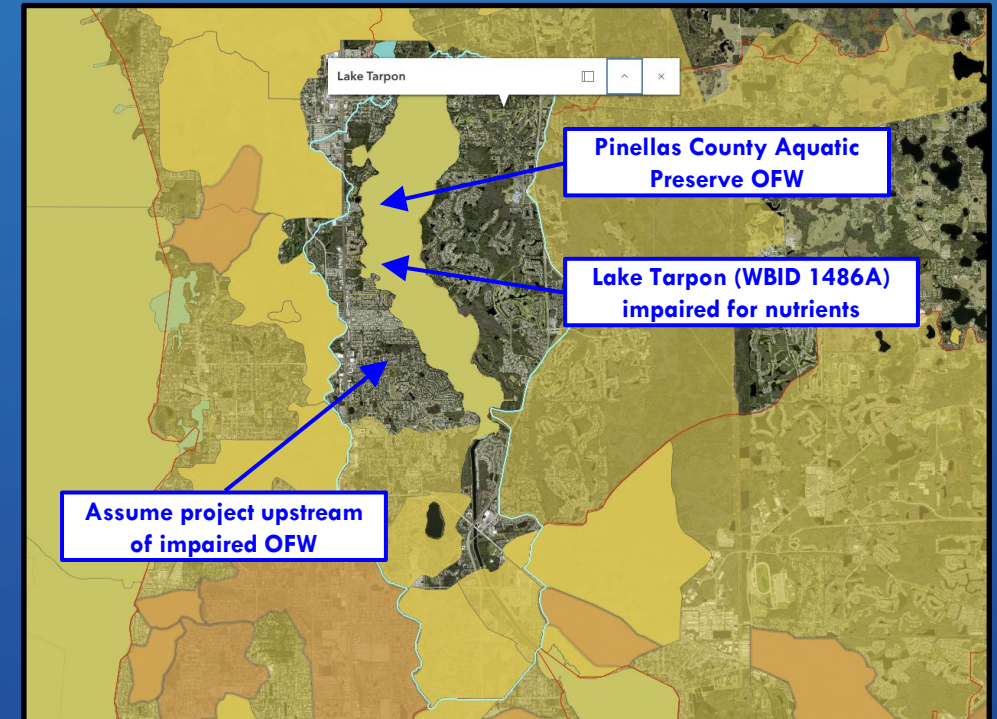
Determination of Applicable Standards (cont.)



Treatment to accomplish the greater of:

- The post-dev. $\leq$ the pre-dev. (nutrient load)
- A reduction of the post-dev. nutrient load for **OFW** criteria:

- **TP reduction: 90%**
- **TN reduction: 80%**

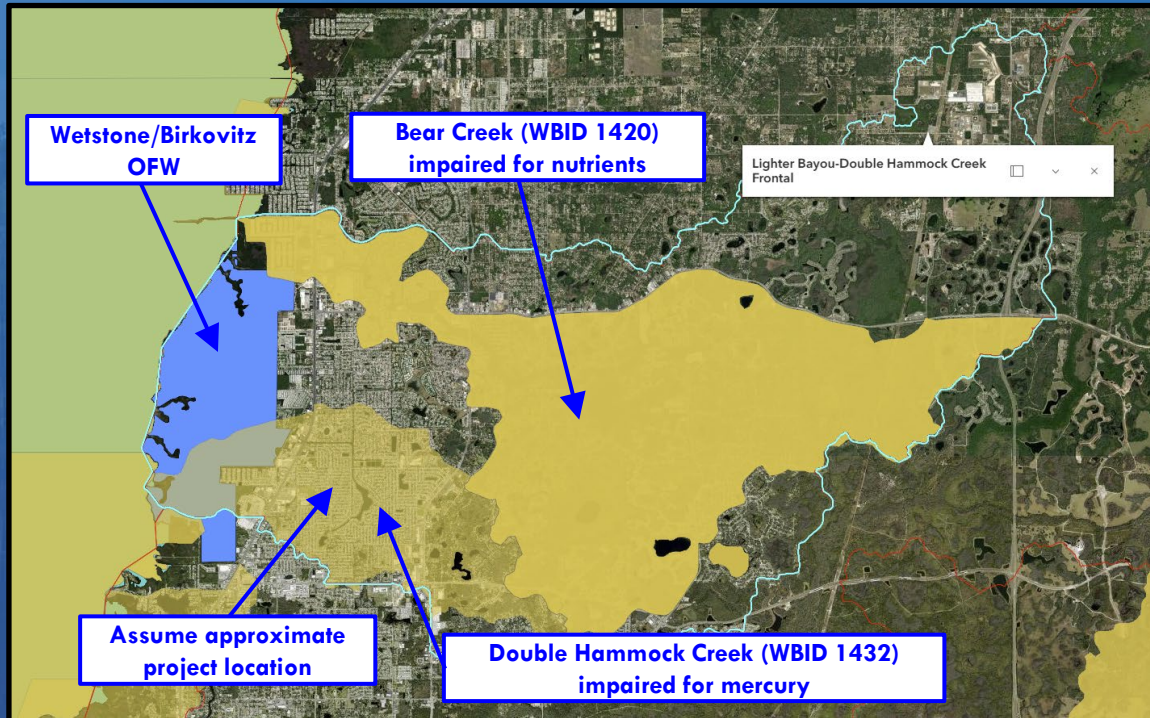


Treatment to accomplish the greater of:

- The post-dev. $\leq$ the pre-dev. (nutrient load)
- A reduction of the post-dev. nutrient load for **Impaired OFW** criteria:

- **TP reduction: 95%**
- **TN reduction: 95%**

Determination of Applicable Standards (cont.)



Treatment to accomplish the greater of:

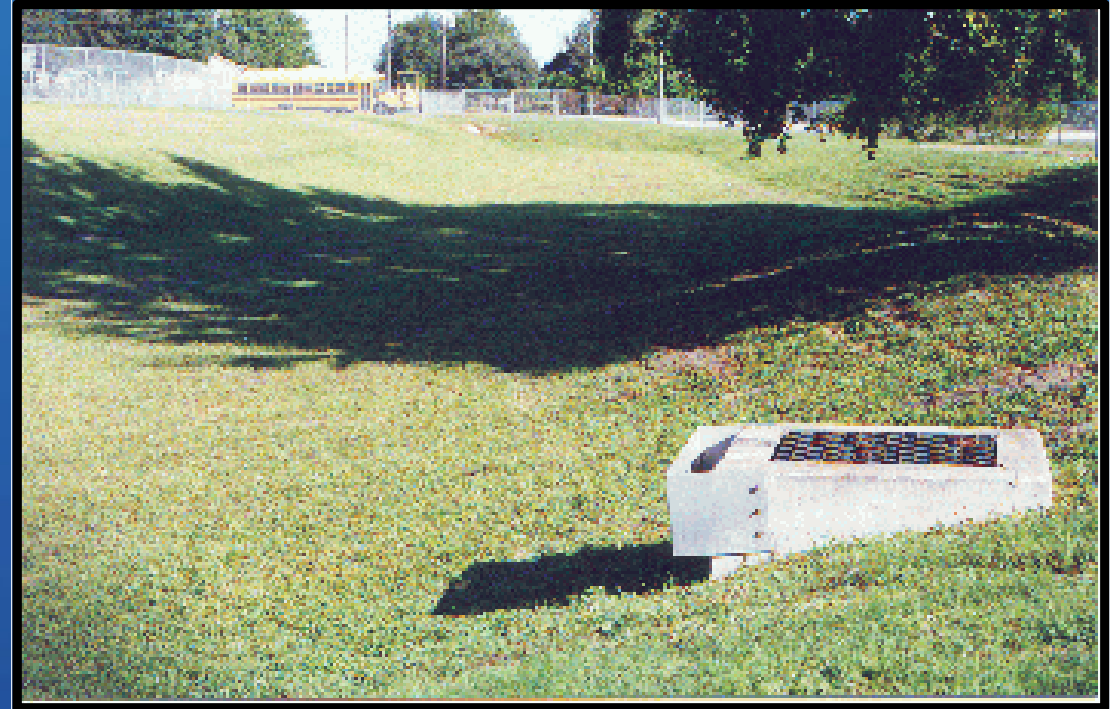
- The post-dev. $\leq$ the pre-dev. (nutrient load)
- A reduction of the post-dev. nutrient load for

OFW criteria:

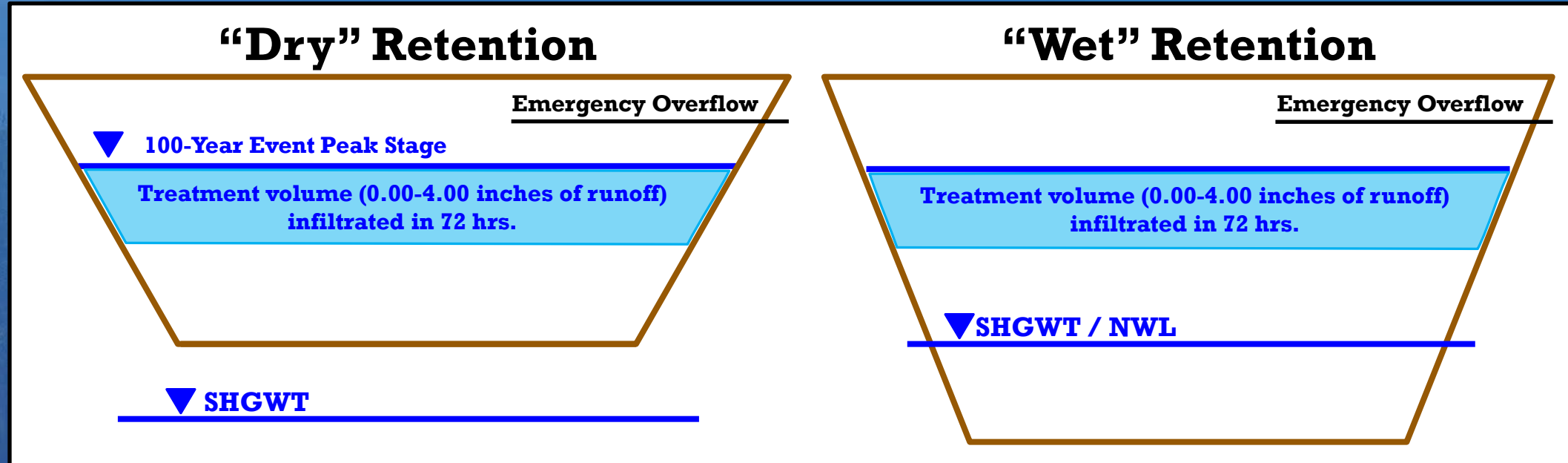
- **TP reduction: 90%**
- **TN reduction: 80%**

100-Year Event Retention

- There are no provisions in Chapter 62-330 F.A.C., A.H.V.I and A.H.V.II. allowing for acceptance of 100-year event retention as a method to address stormwater treatment performance standards.
- **Event** vs. **average annual** approach
- Average annual discharge volume reduction within retention systems is a function of **two design elements**:
 - Retention of runoff volume
 - Recovery of retained runoff volume via infiltration



100-Year Event Retention (cont.)



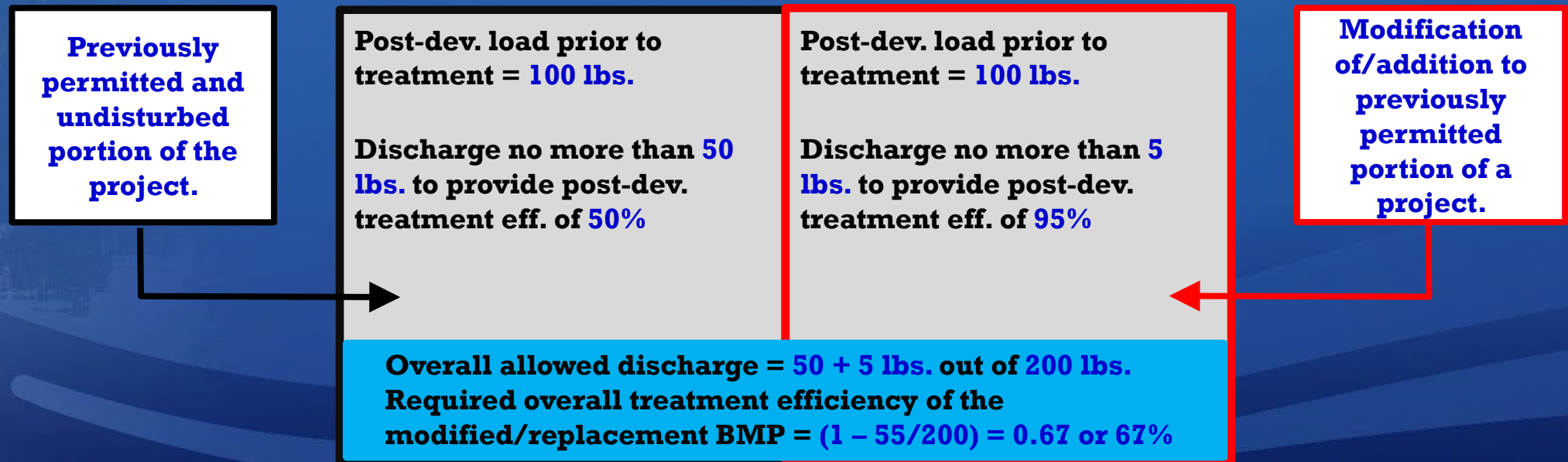
- **Option 1:**
 - The treatment volume is provided within the 100-year event retention volume.
 - The treatment volume is infiltrated into soil within 72 hours.
- **Option 2 (no loading calculations):**
 - 4 inches of runoff volume are provided within the 100-year event retention volume.
 - 4 inches of runoff volume are infiltrated into soil within 72 hours.

Permit Modifications

- Grandfathered permit modifications (Section 3.1.2(e), A.H.V.I):
 - Minor modifications
 - Major modifications “that do not cause substantially different water resource impacts.”
- The following examples of major modifications could demonstrate they “do not cause substantially different water resource impacts”:
 - Major modification to an Individual ERP due to additional/different wetland impacts. No changes to the permitted stormwater management system.
 - Major modification to an Individual ERP for a project which did not require formal stormwater treatment (ex: stormwater retrofit projects).
 - Major modification to an Individual ERP where site changes are proposed, including the potential modification of a previously permitted stormwater management system. The site changes must not result in additional pollutant loads and the stormwater management system modifications must not result in reduced water quality treatment capacity.

Permit Modifications (cont.)

- Conceptual example to a major modification evaluation approach:
 - Determine the treatment efficiency of previously permitted BMP (50% for this example).
 - Determine the required treatment efficiency for the project/disturbed area (95% for this example).
 - Compare the calculated 67% treatment efficiency to treatment efficiency that results post-dev. = pre-dev. Select the more protective one.



Example

Project type:

- Major modification. “Dry” retention BMP on-site. Existing BMP not designed for the increase in impervious area.
- Existing/proposed stormwater treatment via exfiltration.
- Modification project area (disturbed area): **5 ac**

Location:

- HUC 12: **Clearwater Harbor**
- Downstream IW: **Clearwater Harbour South (WBID 1924)**
- Downstream OFW: **Pinellas County Aquatic Preserve**

Pre-development conditions:

- Pre-development area: **10 ac**
- Land use: **High Intensity Commercial**
- Hydrologic Soil Group (HSG): **HSG D (good condition)**
- Impervious areas: **7.0 ac DCIA, 0.0 ac Non-DCIA**

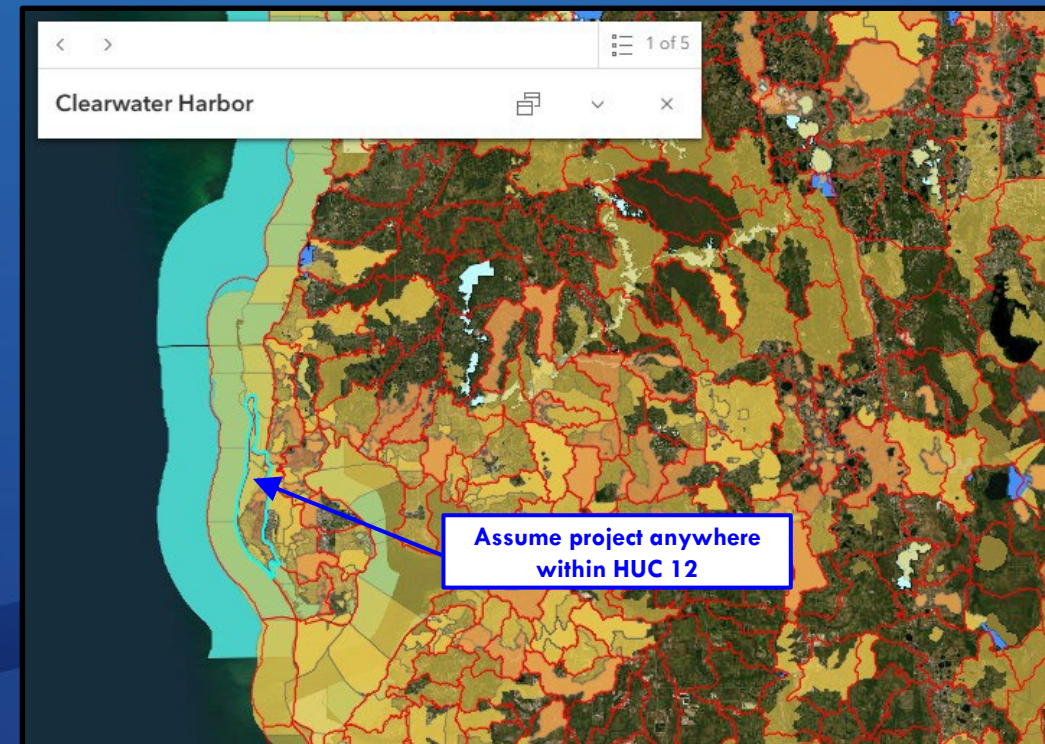
Post-development conditions:

- Post-development area: **10 ac**
- Land use: **High Intensity Commercial**
- Hydrologic Soil Group (HSG): **HSG D (good condition)**
- Impervious areas: **8.0 ac DCIA, 0.0 ac Non-DCIA**

Stormwater treatment criteria:

Impaired OFW (Section 8.3.4, A.H.V.I)

- Post-development $\leq$ the pre-development
- TP reduction: **95%**
- TN reduction: **95%**



Example (cont.)

Rainfall characteristics (Appendix M, A.H.V.I)

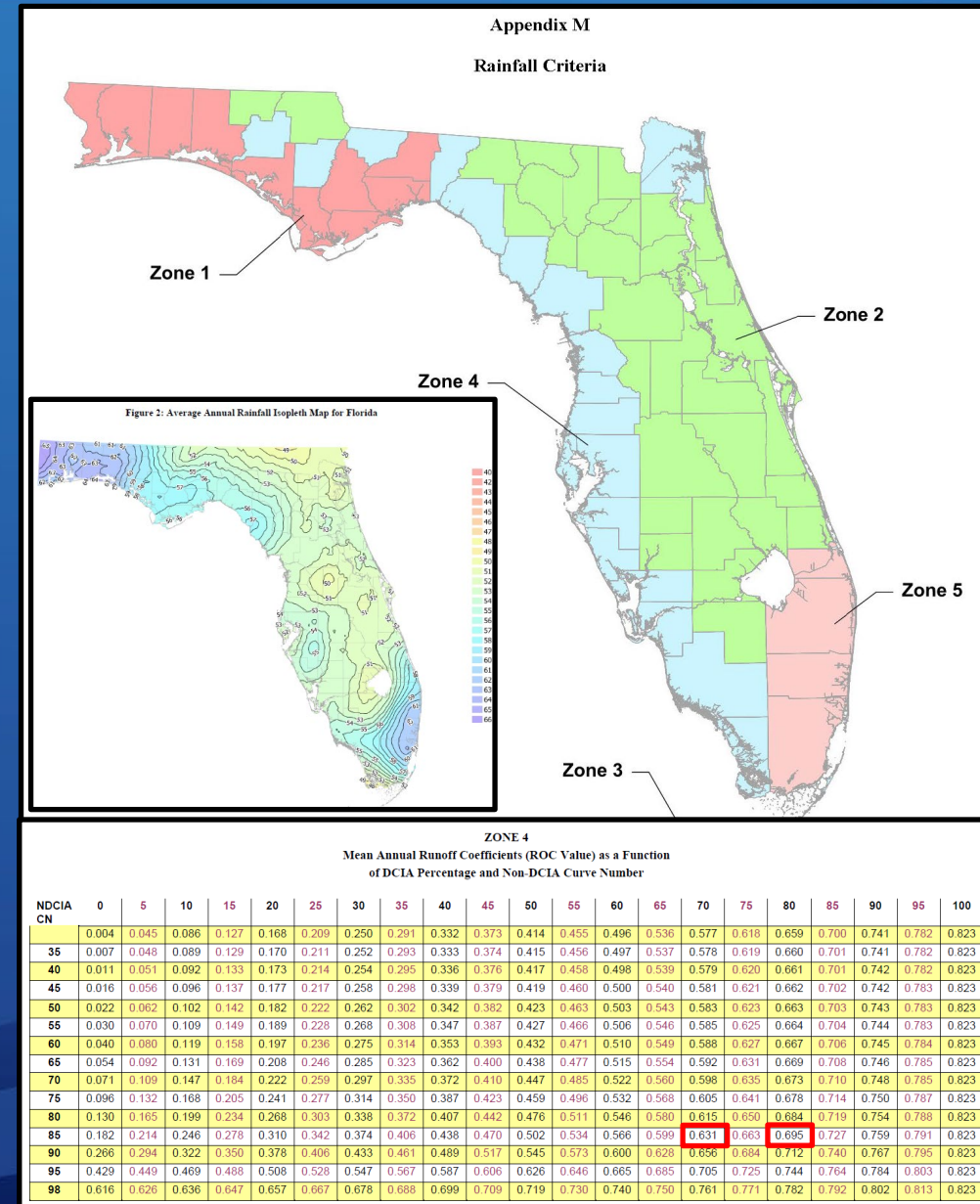
- Meteorological Zone: **Zone 4**
- Average Annual Rainfall: **53 in/yr**

Pre- and post-development % DCIA and Non-DCIA (NDCIA) CN:

- Pre NDCIA CN: $\frac{(80)(10-7 \text{ ac})}{(10-7 \text{ ac})} = 80$
- Pre DCIA: $(7 \text{ ac} / 10 \text{ ac}) (100\%) = 70\%$
- Post NDCIA CN: $\frac{(80)(10-8 \text{ ac})}{(10-8 \text{ ac})} = 80$
- Post DCIA: $(8 \text{ ac} / 10 \text{ ac}) (100\%) = 80\%$

Determine the appropriate mean annual runoff coefficients (ROC) (Appendix N, A.H.V.I).

- Pre ROC: **0.631**
- Post ROC: **0.695**



Example (cont.)

Annual runoff volume (Equation 9-1, A.H.V.I.):

- Pre volume: $10 \text{ ac} * 53 \text{ in} * (1 \text{ ft}/12 \text{ in}) * 0.631 = 27.87 \text{ ac-ft}$
- Post volume: $10 \text{ ac} * 53 \text{ in} * (1 \text{ ft}/12 \text{ in}) * 0.695 = 30.70 \text{ ac-ft}$

Pre annual mass loading prior to existing BMP
(Equation 9-2, A.H.V.I.):

- Pre TP: $27.87 \text{ ac-ft} * 0.345 \text{ mg/l} * 2.719 = 26.14 \text{ lbs/yr}$
- Pre TN: $27.87 \text{ ac-ft} * 2.400 \text{ mg/l} * 2.719 = 181.87 \text{ lbs/yr}$

Treatment efficiency of existing BMP

(Retention efficiency tables, Appendix O, A.H.V.I.):

- Previously permitted retention depth: **0.50 in**
- Treatment efficiency of existing BMP: **50.7% (0.507)**

Mean Annual Mass Removal Efficiencies for 0.50-inches of Retention for Zone 4 by Percent DCIA																				
Non DCIA CN	5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100
30	94.0	94.2	92.1	88.8	84.8	80.5	76.3	72.4	68.6	65.2	62.0	59.1	56.4	53.9	51.7	49.5	47.6	45.8	44.1	42.6
35	91.1	92.3	90.7	87.7	84.0	79.9	75.9	72.0	68.4	65.0	61.9	59.0	56.3	53.9	51.6	49.5	47.6	45.8	44.1	42.6
40	87.8	90.0	88.9	86.4	82.9	79.1	75.3	71.5	68.0	64.7	61.6	58.8	56.2	53.8	51.5	49.4	47.5	45.7	44.1	42.6
45	84.0	87.2	86.8	84.7	81.6	78.1	74.5	70.9	67.5	64.3	61.3	58.6	56.0	53.6	51.4	49.4	47.5	45.7	44.1	42.6
50	79.9	84.0	84.3	82.7	80.1	76.9	73.5	70.2	66.9	63.9	61.0	58.3	55.8	53.5	51.3	49.3	47.4	45.7	44.1	42.6
55	75.6	80.4	81.4	80.4	78.2	75.4	72.3	69.2	66.2	63.3	60.5	57.9	55.5	53.2	51.1	49.2	47.3	45.6	44.0	42.6
60	71.3	76.5	78.1	77.6	75.9	73.6	70.9	68.0	65.2	62.5	59.9	57.4	55.1	53.0	50.9	49.0	47.2	45.6	44.0	42.6
65	67.1	72.4	74.4	74.5	73.3	71.4	69.1	66.6	64.1	61.6	59.2	56.9	54.7	52.6	50.6	48.8	47.1	45.5	44.0	42.6
70	63.0	68.1	70.3	70.8	70.2	68.9	67.0	64.9	62.7	60.5	58.3	56.1	54.1	52.1	50.3	48.6	46.9	45.4	43.9	42.6
75	59.2	63.7	65.9	66.7	66.6	65.7	64.4	62.7	60.9	59.0	57.1	55.2	53.3	51.5	49.8	48.2	46.7	45.2	43.8	42.6
80	55.8	59.4	61.4	62.3	62.4	61.9	61.1	59.9	58.6	57.1	55.5	53.9	52.3	50.7	49.2	47.8	46.4	45.0	43.8	42.6
85	52.7	55.2	56.7	57.5	57.7	57.6	57.1	56.4	55.5	54.5	53.3	52.1	50.8	49.6	48.3	47.1	45.9	44.7	43.6	42.6
90	49.7	51.1	52.0	52.5	52.8	52.8	52.6	52.2	51.7	51.1	50.3	49.6	48.7	47.9	47.0	46.1	45.2	44.3	43.4	42.6
95	46.7	47.1	47.4	47.5	47.6	47.6	47.5	47.3	47.1	46.8	46.5	46.2	45.8	45.4	44.9	44.5	44.0	43.5	43.0	42.6
98	44.9	44.9	44.8	44.8	44.7	44.7	44.6	44.5	44.3	44.2	44.1	44.0	43.8	43.6	43.5	43.3	43.1	42.9	42.7	42.6

Equation 9-1

$$\text{Annual Runoff Volume (ac - ft.)} = \text{Area (acres)} \times \text{Average Annual Rainfall (inches)} \times \text{ROC Value} \times (1\text{ft}/12\text{in})$$

Table 9.2 Standardized Statewide Stormwater Nutrient EMC Values

Land Use Category	Total N (mg/l)	Total P (mg/l)
Low Density Residential	1.65	0.270
Single Family	1.77	0.327
Multi-Family	1.84	0.520
Low Intensity Commercial	0.93	0.19
High Intensity Commercial	2.40	0.345
Light Industrial	1.20	0.260
Highway	1.25	0.173
Dry Prairie	2.025	0.184
Marl Prairie	0.684	0.012
Mesic Flatwoods	1.087	0.043
Ruderal/Upland Pine	1.694	0.162
Scrubby Flatwoods	1.155	0.027
Upland Hardwood	1.042	0.346
Upland Mixed Forest	0.606	1.166
Wet Flatwoods	1.213	0.021
Wet Prairie	1.095	0.015
Xeric Scrub	1.596	0.156
Rangeland/parkland	1.150	0.055
General Agricultural	2.29	0.381
Pasture	3.03	0.593
Citrus	2.11	0.180
Row Crops	2.50	0.577

Equation 9-2

$$\frac{43,560 * 7.48 * 3.785}{453,592} = 2.719$$

$$\text{Annual Average Mass Loading} = \text{Annual Runoff Volume} \times \text{EMC}$$

The components of Equation 9-2 are expressed in different units and require some conversion factors, as provided below.

$$\begin{aligned} & \text{Annual Mass Loading (lb./year)} \\ &= \text{Annual Runoff Volume (ac - ft./year)} * 43,560 \text{ ft}^2 \\ & \quad / \text{ac} * 7.48 \text{ gal/ft}^3 * 3.785 \text{ liter/gal} * \text{EMC (mg/l)} * 1 \text{ lb./453,592 mg} \end{aligned}$$

Example (cont.)

Pre annual mass loading after existing BMP:

- Pre TP: $26.14 \text{ lbs/yr} * (1-0.507) = 12.89 \text{ lbs/yr}$
- Pre TN: $181.87 \text{ lbs/yr} * (1-0.507) = 89.66 \text{ lbs/yr}$

Post annual mass loading prior to proposed BMP (Equation 9-2, A.H.V.I):

- Post TP: $30.70 \text{ ac-ft} * 0.345 \text{ mg/l} * 2.719 = 28.80 \text{ lbs/yr}$
- Post TN: $30.70 \text{ ac-ft} * 2.400 \text{ mg/l} * 2.719 = 200.34 \text{ lbs/yr}$

Required % reduction for post mass loading $\leq$ pre mass loading (Equation 9-3, A.H.V.I):

- TP % reduction: $[1 - (12.89 / 28.80)] * 100\% = 55.25\%$
- TN % reduction: $[1 - (89.66 / 200.34)] * 100\% = 55.25\%$

Required % reduction for minimum post-development:

- TP and TN% reduction for undisturbed area: **50.70% (exist. BMP)**
- TP and TN% reduction for disturbed area: **95.00%**
- Allowed load for undisturbed area:
 TP: $(5 \text{ ac}/10 \text{ ac}) * (1-0.507) * 28.80 \text{ lbs/yr} = 7.10 \text{ lbs/yr}$
 TN: $(5 \text{ ac}/10 \text{ ac}) * (1-0.507) * 200.34 \text{ lbs/yr} = 49.38 \text{ lbs/yr}$
- Allowed load for disturbed area:
 TP: $(5 \text{ ac}/10 \text{ ac}) * (1-0.950) * 28.80 \text{ lbs/yr} = 0.72 \text{ lbs/yr}$
 TN: $(5 \text{ ac}/10 \text{ ac}) * (1-0.950) * 200.34 \text{ lbs/yr} = 5.01 \text{ lbs/yr}$
- TP % reduction: $[1 - ((7.10 + 0.72 \text{ lbs/yr}) / 28.80 \text{ lbs/yr})] * 100\% = 72.85\%$
- TN % reduction: $[1 - ((49.38 + 5.01 \text{ lbs/yr}) / 200.34 \text{ lbs/yr})] * 100\% = 72.85\%$

Equation 9-1

$$\text{Annual Runoff Volume (ac - ft.)} = \text{Area (acres)} \times \text{Average Annual Rainfall (inches)} \times \text{ROC Value} \times (1\text{ft}/12\text{in})$$

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Equation 9-2

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Equation 9-3: Percent reduction calculation

$$\left(1 - \left(\frac{\text{Predevelopment loading}}{\text{Post development Loading before treatment}} \right) \right) \times 100$$

	TP	TN
Post $\leq$ Pre Reduction	55.25%	55.25%
Minimum Post Reduction	72.85%	72.85%
Required % Reduction	72.85%	72.85%

Example (cont.)

Retention depth to meet the treatment efficiency (Retention efficiency tables, Appendix O, A.H.V.I):

- Required TP % reduction: **72.85%** Required TN % reduction: **72.85%**
- Required % reduction: **72.85%**
- Required retention depth: **1.09 in** Required retention/treatment volume: **10 ac * 1.09 in * (1 ft/12 in) = 0.91 ac-ft**

Mean Annual Mass Removal Efficiencies for 1.00-inches of Retention for Zone 4 by Percent DCIA

Non DCIA CN	5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100
30	96.6	97.5	97.2	96.4	95.2	93.7	91.9	90.0	87.9	85.7	83.5	81.2	79.0	76.9	74.8	72.8	70.9	69.1	67.3	65.6
35	95.0	96.3	96.2	95.6	94.5	93.1	91.4	89.6	87.5	85.4	83.2	81.1	78.9	76.8	74.8	72.8	70.9	69.0	67.2	65.6
40	93.0	94.9	95.1	94.6	93.6	92.4	90.8	89.0	87.1	85.1	82.9	80.8	78.7	76.7	74.7	72.7	70.8	69.0	67.2	65.6
45	90.8	93.1	93.6	93.4	92.6	91.5	90.0	88.4	86.5	84.6	82.6	80.5	78.5	76.5	74.5	72.6	70.7	68.9	67.2	65.6
50	88.3	91.1	92.0	91.9	91.4	90.4	89.1	87.6	85.9	84.0	82.1	80.1	78.2	76.2	74.3	72.5	70.6	68.9	67.2	65.6
55	85.7	89.0	90.1	90.2	89.9	89.1	88.0	86.6	85.1	83.4	81.5	79.7	77.8	75.9	74.1	72.3	70.5	68.8	67.1	65.6
60	83.1	86.6	87.9	88.3	88.1	87.6	86.7	85.5	84.1	82.5	80.8	79.1	77.3	75.6	73.8	72.1	70.4	68.7	67.1	65.6
65	80.4	83.9	85.5	86.1	86.1	85.8	85.1	84.1	82.9	81.5	80.0	78.4	76.8	75.1	73.5	71.8	70.2	68.6	67.1	65.6
70	77.7	81.2	82.8	83.6	83.9	83.7	83.2	82.4	81.4	80.3	78.9	77.5	76.0	74.5	73.0	71.5	70.0	68.5	67.0	65.6
75	75.2	78.4	80.1	81.0	81.3	81.3	81.0	80.4	79.6	78.7	77.6	76.4	75.1	73.8	72.4	71.0	69.6	68.3	66.9	65.6
80	73.0	75.6	77.2	78.1	78.5	78.6	78.4	78.1	77.5	76.8	75.9	74.9	73.9	72.8	71.6	70.4	69.2	68.0	66.8	65.6
85	71.1	73.0	74.2	75.0	75.4	75.6	75.5	75.3	74.9	74.4	73.8	73.1	72.3	71.4	70.5	69.6	68.6	67.6	66.6	65.6
90	69.4	70.5	71.2	71.7	72.0	72.2	72.2	72.1	71.9	71.6	71.2	70.8	70.3	69.7	69.1	68.5	67.8	67.1	66.3	65.6
95	67.6	67.9	68.1	68.3	68.4	68.5	68.5	68.5	68.4	68.3	68.2	68.0	67.8	67.6	67.3	67.0	66.7	66.3	65.9	65.6
98	66.7	66.8	66.8	66.8	66.8	66.7	66.7	66.7	66.6	66.6	66.5	66.4	66.3	66.3	66.1	66.0	65.9	65.8	65.7	65.6

Mean Annual Mass Removal Efficiencies for 1.25-inches of Retention for Zone 4 by Percent DCIA

Non DCIA CN	5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100
30	97.3	98.0	98.0	97.5	96.8	95.8	94.6	93.3	91.8	90.2	88.5	86.8	85.0	83.2	81.4	79.6	77.9	76.2	74.5	72.9
35	95.9	97.2	97.3	96.9	96.2	95.3	94.2	92.9	91.5	89.9	88.3	86.6	84.8	83.0	81.3	79.5	77.8	76.2	74.5	72.9
40	94.5	96.0	96.3	96.1	95.5	94.6	93.6	92.4	91.1	89.6	88.0	86.3	84.6	82.9	81.2	79.5	77.8	76.1	74.5	72.9
45	92.7	94.6	95.1	95.0	94.6	93.9	93.0	91.8	90.6	89.1	87.6	86.0	84.4	82.7	81.0	79.3	77.7	76.1	74.5	72.9
50	90.7	93.1	93.8	93.8	93.6	93.0	92.1	91.1	89.9	88.6	87.2	85.7	84.1	82.4	80.8	79.2	77.6	76.0	74.5	72.9
55	88.6	91.3	92.2	92.5	92.3	91.9	91.2	90.3	89.2	88.0	86.6	85.2	83.7	82.1	80.6	79.0	77.5	75.9	74.4	72.9
60	86.4	89.3	90.5	90.9	90.9	90.6	90.0	89.2	88.3	87.2	86.0	84.6	83.2	81.8	80.3	78.8	77.3	75.8	74.4	72.9
65	84.3	87.2	88.5	89.1	89.2	89.0	88.6	88.0	87.2	86.3	85.2	84.0	82.7	81.3	79.9	78.5	77.1	75.7	74.3	72.9
70	82.1	85.0	86.4	87.1	87.4	87.3	87.0	86.6	85.9	85.1	84.2	83.1	82.0	80.7	79.5	78.2	76.9	75.6	74.3	72.9
75	80.1	82.7	84.1	84.9	85.3	85.4	85.2	84.9	84.4	83.7	82.9	82.0	81.1	80.0	78.9	77.7	76.6	75.4	74.2	72.9
80	78.2	80.4	81.7	82.5	83.0	83.2	83.1	82.9	82.5	82.0	81.4	80.7	79.9	79.1	78.1	77.1	76.1	75.1	74.0	72.9
85	76.7	78.3	79.3	80.1	80.5	80.7	80.7	80.6	80.4	80.1	79.6	79.1	78.5	77.8	77.1	76.4	75.5	74.7	73.8	72.9
90	75.4	76.3	77.0	77.5	77.8	78.0	78.1	78.0	77.9	77.7	77.5	77.1	76.8	76.3	75.9	75.3	74.8	74.2	73.6	72.9
95	74.2	74.5	74.7	74.9	75.0	75.1	75.1	75.1	75.1	75.0	74.9	74.8	74.6	74.5	74.3	74.0	73.8	73.5	73.3	72.9
98	73.7	73.7	73.7	73.7	73.7	73.7	73.7	73.7	73.7	73.6	73.6	73.6	73.5	73.4	73.4	73.3	73.2	73.1	73.0	72.9

Comments and Questions