Pedestrian Facilities   
(Sidewalks, Streetscaping, And ADA)

Prioritizing Criteria and Measures

January 22, 2020

**Definition:** A project that primarily benefits pedestrians as opposed to multiple types of non-motorized users. Most non-motorized projects should apply in the Multiuse Trail and Bicycle Facilities application category. All projects must relate to surface transportation. A facility may serve both a transportation purpose and a recreational purpose; a facility that connects people to recreational destinations may be considered to have a transportation purpose. Multiuse trail bridges or underpasses should apply in the Multiuse Trail and Bicycle Facilities application category instead of this application category given the nature of the users and the higher maximum awards. Routine maintenance activities on a pedestrian facility are not eligible for funding. As defined by the FHWA, examples of routine maintenance activities include shrub and brush removal or minor drainage improvements. In order to be eligible for funding, reconstruction projects must be replacing a facility at the end of its useful life or include improvements to the facility (e.g., ADA, safety, other deficiencies). Resurfacing of a facility is eligible only if other improvements to the facility are also included in the proposed project.

### Examples of Pedestrian Facility Projects:

* Sidewalks
* Streetscaping
* Americans with Disabilities Act (ADA) improvements
* Making similar improvements in a concentrated geographic area, such as sidewalk gap closure throughout a defined neighborhood or downtown area

### Scoring:

| Criteria and Measures | Points | % of Total Points |
| --- | --- | --- |
| 1. Role in the Regional Transportation System and Economy | **150** | **14%** |
| Measure A - Connection to Jobs and Educational Institutions | 150 |  |
| 1. Potential Usage | **150** | **14%** |
| Measure A - Existing population within ½ mile | 150 |  |
| 1. Equity and Housing Performance | **120** | **11%** |
| Measure A – Benefits and outreach to disadvantaged populations | 70 |  |
| Measure B – Housing Performance Score/ affordable housing connection | 50 |  |
| 1. Deficiencies and Safety | **300** | **27%** |
| Measure A - Barriers overcome or gaps filled | 120 |  |
| Measure B - Deficiencies corrected or safety problems addressed | 180 |  |
| 1. Multimodal Facilities and Existing Connections | **150** | **14%** |
| Measure A - Transit or bicycle elements of the project and connections | 150 |  |
| 1. Risk Assessment/Public Engagement | **130** | **12%** |
| Measure A - Risk Assessment Form | 130 |  |
| 1. Cost Effectiveness | **100** | **9%** |
| Measure A – Cost effectiveness (total points awarded/total project cost) | 100 |  |
| Total | **1,100** |  |

## Role in the Regional Transportation System and Economy (150 Points)

This criterion measures the regional significance of the project, including the project’s connections to jobs, Educational Institutions, and people.

1. MEASURE: Reference the “Regional Economy” map generated at the beginning of the application process. Report the existing employment and educational institution enrollment within 1/2 mile of the project. Existing employment will be measured by summing the employment located in the Census block groups that intersect the 1/2-mile buffer. Enrollment at public and private post-secondary institutions will also be measured.

RESPONSE: (Select all that apply, based on the “Regional Economy” map):

* Existing Employment Within One-Half Mile:\_\_\_\_\_\_\_
* Existing Post-Secondary Enrollment Within One-Half Mile:\_\_\_\_\_\_\_

Upload the “Regional Economy” map used for this measure.

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| --- |
| SCORING GUIDANCE (150 Points)  The applicant with the highest combined total employment and post-secondary education enrollment will receive the full points for this measure. Remaining projects will receive a proportionate share of the full points. For example, if the application being scored had 1,000 workers/students within 1/2 mile and the top project had 1,500 workers/students, this applicant would receive (1,000/1,500)\*150 points or 100 points.  Using the Metropolitan Council model, all Census block groups that are included within or intersect the buffer area around the project will be included in the analysis.  In the case of multiple project locations, the employment and post-secondary enrollments around each length or point will be added together. |

## Potential Usage (150 Points)

This criterion quantifies the project’s potential usage based on the existing population adjacent to the project.

1. MEASURE: Reference the “Population Summary” map generated at the beginning of the application process. Report the existing population within 1/2-mile, as depicted on the “Population Summary” map.

RESPONSE: (Data from the “Population Summary” map):

* Existing Population Within One-Half Mile: \_\_\_\_\_\_\_

Upload the “Population Summary” map used for this measure.

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| --- |
| SCORING GUIDANCE (150 Points)  The applicant with the highest population will receive the full 150 points, as will the applicant with the highest number of jobs. Remaining projects will receive a proportional share of the full points. For example, if the application being scored had 1,000 people within 1/2 mile and the top project had 1,500 people, this applicant would receive (1,000/1,500)\*150 points or 100 points.  Using the Metropolitan Council model, all Census block groups that are included within or intersect the buffer area around the project will be included in the analysis.  In the case of multiple project locations, population around each length or point will be added together. |

## Equity and Housing Performance (120 Points)

This criterion addresses the [Council’s role in advancing equity](https://metrocouncil.org/About-Us/why-we-matter/Equity.aspx) by examining how a project directly provides benefits to, or impacts (positive and negative) low-income populations, people of color, people with disabilities, youth and the elderly. The criterion evaluates whether the applicant engaged these populations to identify transportation needs and potential solutions and how the project will address these identified needs. The criterion also evaluates a community’s overall efforts to implement affordable housing and how the project improves multimodal access to affordable housing residents.

1. MEASURE: Socio-Economic Equity
2. **Sub-measure**: Equity Population Engagement (0 to 30 points): A successful project is one that is the result of active engagement of low-income populations, people of color, persons with disabilities, youth and the elderly. Engagement should occur prior to and during a project’s development, with the intent to provide direct benefits to, or solve, an expressed transportation issue, while also limiting and mitigating any negative impacts. Describe and map the location of any low-income populations, people of color, disabled populations, youth or the elderly within a ½ mile of the proposed project. Describe how these specific populations were engaged and provided outreach to, whether through community planning efforts, project needs identification, or during the project development process. Describe what engagement methods and tools were used and how the input is reflected in the projects’ purpose and need and design. Elements of quality engagement include: outreach and engagement to specific communities and populations that are likely to be directly impacted by the project; techniques to reach out to populations traditionally not involved in community engagement related to transportation projects; feedback from these populations identifying potential positive and negative elements of the proposed project through engagement, study recommendations, or plans that provide feedback from populations that may be impacted by the proposed project. If relevant, describe how NEPA or Title VI regulations will guide engagement activities.

|  |
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| (Limit 1,400 characters; approximately 200 words): |

1. **Sub-measure:** Equity Population Benefits and Impacts (0 to 40 points): A successful project is one that has been designed to provide direct benefits to low-income populations, people of color, persons with disabilities, youth and the elderly. All projects must mitigate potential negative benefits as required under federal law. Projects that are designed to provide benefits go beyond the mitigation requirement to proactively provide transportation benefits and solve transportation issues experienced by Equity populations.
2. (0 to 40 points) Describe the project’s benefits to low-income populations, people of color, children, people with disabilities, and the elderly. Benefits could relate to pedestrian and bicycle safety improvements; public health benefits; direct access improvements for residents or improved access to destinations such as jobs, school, health care or other; travel time improvements; gap closures; new transportation services or modal options, leveraging of other beneficial projects and investments; and/or community connection and cohesion improvements. Note that this is not an exhaustive list.

|  |
| --- |
| (Limit 2,800 characters; approximately 400 words): |

1. (-10 to 0 points) Describe any negative impacts to low-income populations, people of color, children, people with disabilities, and the elderly created by the project, along with measures that will be taken to mitigate them. Negative impacts that are not adequately mitigated can result in a reduction in points.

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| (Limit 2,800 characters; approximately 400 words): |

Below is a list of negative impacts. Note that this is not an exhaustive list.

* Increased difficulty in street crossing caused by increased roadway width, increased traffic speed, wider turning radii, or other elements that negatively impact pedestrian access.
* Increased noise.
* Decreased pedestrian access through sidewalk removal / narrowing, placement of barriers along the walking path, increase in auto-oriented curb cuts, etc.
* Project elements that are detrimental to location-based air quality by increasing stop/start activity at intersections, creating vehicle idling areas, directing an increased number of vehicles to a particular point, etc.
* Increased speed and/or “cut-through” traffic.
* Removed or diminished safe bicycle access.
* Inclusion of some other barrier to access to jobs and other destinations.
* Displacement of residents and businesses.
* Mitigation of temporary construction/implementation impacts such as dust; noise; reduced access for travelers and to businesses; disruption of utilities; and eliminated street crossings.
* Other

1. **Sub-measure: Bonus Points (0 to 25 points)** Those projects that score at least 80% of the maximum total points available through measures A and B will be awarded bonus points based on the geographic location of the project. These points will be assigned as follows, based on the highest-scoring geography the project contacts:
   1. 25 points to projects within an Area of Concentrated Poverty with 50% or more people of color
   2. 20 points to projects within an Area of Concentrated Poverty
   3. 15 points to projects within census tracts with the percent of population in poverty or population of color above the regional average percent
   4. 10 points for all other areas

Upload the “Socio-Economic Conditions” map used for this measure.

RESPONSE (Select one, based on the “Socio-Economic Conditions” map):

* Project is located in an Area of Concentrated Poverty where 50% or more of residents are people of color (ACP50): ☐
* Project is located in an Area of Concentrated Poverty: ☐
* Project’s census tracts are above the regional average for population in poverty or population of color: ☐
* Project located in a census tract that is below the regional average for population in poverty or populations of color, or includes children, people with disabilities, or the elderly: ☐

SCORING GUIDANCE (70 Points)

Each application will be qualitatively scored based on the available points for each measure and will receive the number of points awarded. If the applicant receives at least 80% of the available points, i.e., 40 points for the Roadway applications, the project will receive Bonus points as described under Measure C. If an applicant qualifies for Bonus points it will result in a Socio-Economic Equity score of more than the total points available.

1. MEASURE: Projects will be scored based on two housing measures: 1. the 2019 Housing Performance Score for the city or township in which the project is located (40 points) and 2. the project’s connection to affordable housing (10 points) as described below.

**Part 1 (40 points): Housing Performance Score**

A city or township’s housing performance score is calculated annually by the Metropolitan Council using data from four categories: new affordable or mixed-income housing completed in the last ten years; preservation projects completed in the last seven years and/or substantial rehabilitation projects completed in the last three years; housing program participation and production, and housing policies and ordinances; and characteristics of the existing housing stock. Data for the housing performance scores are updated each year by the Council, and the city or township is provided with an opportunity to review and revise the information

Council staff will use the most current housing score for each city or township. If the project is located in more than one jurisdiction, the points will be awarded based on a weighted average using length or population of the project in each jurisdiction. If a project is located in a city or township with no allocation of affordable housing need (either there is no forecasted household growth or the area does not have land to support sewered development), the project will not be disadvantaged by this measure and the project’s total score will be adjusted during scoring to remove this scoring measure.

RESPONSE: (NOTE: The below bullets vary slightly by funding category)

* City/Township: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Total project cost: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Length of Segment within each City/Township: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Percent of total funds to be spent within City/Township: \_\_\_\_\_\_\_

**Part 2 (10 points): Affordable Housing Access**

This measure is a qualitative scoring measure. Describe and map any affordable housing developments— planned, under construction or existing, within ½ mile of the proposed project. The applicant should note the development stage, number of units, number of bedrooms per unit, and level of affordability using 2019 affordability limits. Also note whether the affordability is guaranteed through funding restrictions (i.e. LIHTC, 4d) or is unsubsidized, if housing choice vouchers are/will be accepted, and if there is a fair housing marketing plan required or in place.

Describe how the proposed project will improve or impact access for residents of the affordable housing locations within ½ mile of the project. This should include a description of improved access by all modes, automobiles, transit, bicycle and pedestrian access. Since residents of affordable housing are more likely not to own a private vehicle, higher points will be provided to roadway projects that include other multimodal access improvements.

RESPONSE:

(Limit 2,100 characters; approximately 300 words):

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| --- |
| SCORING GUIDANCE (50 Points)  Part 1 (40 points): The applicant with the highest 2019 Housing Performance Score will receive the full points. Remaining projects will receive a proportionate share of the full points. For example, if the application being scored had a Housing Performance Score of 55 and the top project had a Housing Performance Score of 90, this applicant would receive (55/90)\*40 points or 24 points.  Projects will use the city Housing Performance Score based on the project location. If a project is located in more than one jurisdiction, the points will be awarded based on a weighted average of the city or township scores for the project location based on the length of the project in each jurisdiction. For stand-alone roadway (intersection, bridge, underpass, and interchange) projects, a one-mile radius-buffer will be drawn around the project. If the radius-buffer enters more than one jurisdiction, the points will be awarded based on the proportionate population of the Census blocks in each jurisdiction that are all or partially located in the area within the one-mile radius-buffer.  If a project is located in a city or township with no allocation of affordable housing need (either there is no forecasted household growth or the area does not have land to support sewered development), the project’s total score will be adjusted as a result. If this is the case, the hold-harmless method will be used: the total points possible in the application will be 960 instead of 1,000. The total points awarded through the rest of the application (900 as a hypothetical example) will be divided by 960, then multiplied by 1,000. Therefore, a project scoring 900 out of 960, will equate to 938 points on a 1,000-point scale. If a portion of the project is located in a city with an affordable housing allocation and the other portion is located in a township with no affordable housing allocation, then a combination of the Housing Performance Score (or weighted average) and the hold-harmless method should be used. This will result in a total score that will be somewhere between 960 and 1,000; then the score will need to be adjusted to fit a 1,000-point scale. NOTE: Any community without a Housing Performance Score in 2018 will be awarded the better of its new score in 2020 and the above method. NOTE: in these cases, the raw points from Part 2 will be included in the 960-point total.  Part 2 (10 points): The project that best provides meaningful improvements to access to the affordable housing units will receive the full 10 points. Multiple projects may receive the highest possible score of 10 points based on this assessment. Remaining projects will receive a share of the full points at the scorer’s discretion.  Final Score (50 points): The scores in Parts 1 and 2 will be totaled. If no application gets 50 points, the highest-scoring project will be awarded 50 points, with other projects adjusted proportionately.  Note: Metropolitan Council staff will score this measure. |

## Deficiencies and Safety (300 Points)

This criterion addresses the project’s ability to improve the overall safety of an existing or future pedestrian facility. This includes how the project will overcome physical barriers or system gaps, correct deficiencies, and/or fix a safety problem.

1. MEASURE: Discuss how the project will overcome barriers (i.e., bridge or tunnel), fill gaps, or connect system segments in the pedestrian network. The applicant should include a description of barriers and gap improvements for the project. If the project is crossing or circumventing a barrier (e.g., river, stream, railroad corridor, freeway, or multi-lane highway), the applicant should describe the magnitude of the barrier (number of lanes, average daily traffic, posted speed, etc.) and how the proposed project will improve travel across or around that barrier. The description should include distance to and condition of the nearest parallel crossing of the barrier, including the presence or absence of pedestrian facilities, number of lanes, average daily traffic, and posted speed limit. The description should also include details of any project elements that advance needs prioritized in an ADA Transition Plan. (120 Points)

RESPONSE (Limit 2,800 characters; approximately 400 words):

SCORING GUIDANCE (120 Points)

The applicant will receive up to 120 points if the response shows that the project overcomes a physical barrier or system gap. The project that most meets the intent will receive the maximum points. Remaining projects will receive a portion of the maximum points based on the response. Projects that do not fulfill the intent of the measure will receive 0 points.

1. MEASURE: Discuss how the project will correct existing deficiencies or address an identified safety or security problem on the facility. The applicant should also include any available project site-related safety data (e.g. crash data, number of conflict points to be eliminated by the project by type of conflict (bicyclist/pedestrian, bicyclist/vehicle, pedestrian/vehicle, and vehicle/vehicle)) to demonstrate the magnitude of the existing safety problem. Where available, use of local crash data for the project length is highly encouraged. Crashes involving bicyclists and pedestrians should be reported for the latest available 10-year period. As part of the response, demonstrate that the project improvements will reduce the crash potential and provide a safer environment (by referencing crash reduction factors or safety studies) and/or correct a deficiency.

RESPONSE (Limit 2,800 characters; approximately 400 words):

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| --- |
| SCORING GUIDANCE (180 Points)  The applicant will receive the points shown below, based on the magnitude of the deficiencies or safety issues and the quality of the improvements, as addressed in the response. The scorer will first place each project into one of the two categories below based on whether crash data is cited as part of the response. The project with the most extensive improvements will receive the full points for each category. Remaining projects will receive a share of the full points as listed below.  For applicants that provide actual bicycle and pedestrian crash data to demonstrate the magnitude of the existing safety problem only. Project also demonstrates that the project will reduce the crash potential and provide a safer environment and/or correct a deficiency. The project that will reduce the most crashes will receive 180 points. The other projects in this category will receive a proportional share between 101 and 180 points (i.e., a project that reduces one-half of the crashes of the top project would receive 150 points): 101 to 180 Points  For applicants that do not provide actual bicycle and pedestrian crash data. However, the applicant demonstrates the project’s ability to reduce the risk for bicycle and pedestrian crashes with the reduction of modal conflict points (bike/pedestrian, bike/vehicle, pedestrian/vehicle, and vehicle/vehicle), safety improvements that address these modal conflicts, or the project’s ability to correct deficiencies. The top project will receive 120 points based on the quality of the project and response: 0 to 120 Points |

## Multimodal Elements and Connections (150 Points)

This criterion measures how the project improves the travel experience, safety, and security for other modes of transportation, provides strong connections, and addresses the safe integration of these modes.

1. MEASURE: Discuss any transit or bicycle elements that are included as part of the project and how they improve the travel experience, safety, and security for users of these modes. Applicants should make sure that new multimodal elements described in the response are accounted for as part of the cost estimate form earlier in the application. Also, describe the existing transit and bicycle connections. Furthermore, address how the proposed pedestrian facility project safely integrates all modes of transportation (i.e., pedestrians, transit, bicyclists, and vehicles). Applicants should note if there is no transit service in the project area and identify supporting studies or plans that address why mode may not be incorporated into the project.

RESPONSE: (Limit 2,800 characters; approximately 400 words):

SCORING GUIDANCE (150 Points)

The project with the most comprehensive enhancements to the travel experience and safe integration of other modes, as addressed in the required response, will receive the full points. Remaining projects will receive a share of the full points at the scorer’s discretion. The project score will be based on the quality of the improvements, as opposed to being based solely on the number of modes addressed. Projects that include the transit or bicycle elements as part of the project should receive slightly more points than existing or planned multimodal facilities on parallel routes, consistent with the supporting plans and studies.

## Risk Assessment (130 Points)

This criterion measures the number of risks associated with the project. High-risk applications increase the likelihood that projects will withdraw at a later date. If this happens, the region is forced to reallocate the federal funds in a short amount of time or return them to the US Department of Transportation. These risks are outlined in the checklist in the required Risk Assessment.

1. MEASURE: Applications involving construction must complete the Risk Assessment. This checklist includes activities completed to-date, as well as an assessment of risks (e.g., right-of-way acquisition, proximity to historic properties, etc.).

RESPONSE: (Complete Risk Assessment):

Please check those that apply and fill in anticipated completion dates for all projects, except for new/expanded transit service projects or transit vehicle purchases.

1. **Layout (30 Percent of Points)**

Layout should include proposed geometrics and existing and proposed right-of-way boundaries

|  |  |  |
| --- | --- | --- |
| 100% |  | Layout approved by the applicant and all impacted jurisdictions (i.e., cities/counties that the project goes through or agencies that maintain the roadway(s)). **A PDF of the layout must be attached along with letters from each jurisdiction to receive points.** |
| 50% |  | Layout completed but not approved by all jurisdictions. **A PDF of the layout must be attached to receive points.** |
| 0% |  | Layout has not been started |

Anticipated date or date of completion: \_\_\_\_\_\_\_

1. **Review of Section 106 Historic Resources (20 Percent of Points)**

|  |  |  |
| --- | --- | --- |
| 100% |  | No known historic properties eligible for or listed in the National Register of Historic Places are located in the project area, and project is not located on an identified historic bridge |
| 100% |  | There are historical/archeological properties present but determination of “no historic properties affected” is anticipated. |
| 80% |  | Historic/archeological property impacted; determination of “no adverse effect” anticipated |
| 40% |  | Historic/archeological property impacted; determination of “adverse effect” anticipated |
| 0% |  | Unsure if there are any historic/archaeological properties in the project area. |

Project is located on an identified historic bridge:

1. **Right-of-Way (30 Percent of Points)**

|  |  |  |
| --- | --- | --- |
| 100% |  | Right-of-way, permanent or temporary easements either not required or all have been acquired |
| 50% |  | Right-of-way, permanent or temporary easements required, plat, legal descriptions, or official map complete |
| 25% |  | Right-of-way, permanent or temporary easements required, parcels identified |
| 0% |  | Right-of-way, permanent or temporary easements required, parcels not all identified |

Anticipated date or date of acquisition \_\_\_\_\_\_\_

1. **Railroad Involvement (20 Percent of Points)**

|  |  |  |
| --- | --- | --- |
| 100% |  | No railroad involvement on project or railroad Right-of-Way agreement is executed (include signature page, if applicable) |
| 50% |  | Railroad Right-of-Way Agreement required; negotiations have begun |
| 0% |  | Railroad Right-of-Way Agreement required; negotiations have not begun. |

Anticipated date or date of executed Agreement \_\_\_\_\_\_

1. **Public Involvement (20 Percent of Points)**

Projects that have been through a public process with residents and other interested public entities are more likely than others to be successful. The project applicant must indicate that events and/or targeted outreach (e.g., surveys and other web-based input) were held to help identify the transportation problem, how the potential solution was selected instead of other options, and the public involvement completed to date on the project.

List Dates of most recent meetings and outreach specific to this project:

* Meeting with general public: \_\_\_\_\_\_\_\_\_\_\_
* Meeting with partner agencies: \_\_\_\_\_\_\_\_\_\_\_
* Targeted online/mail outreach: \_\_\_\_\_\_\_\_\_
  + Number of respondents: \_\_\_\_\_\_\_\_\_\_

|  |  |  |
| --- | --- | --- |
| 100% |  | Meetings specific to this project with the general public and partner agencies have been used to help identify the project need. |
| 75% |  | Targeted outreach specific to this project with the general public and partner agencies have been used to help identify the project need. |
| 50% |  | At least one meeting specific to this project with the general public has been used to help identify the project need. |
| 50% |  | At least one meeting specific to this project with key partner agencies has been used to help identify the project need. |
| 25% |  | No meeting or outreach specific to the project was conducted, but the project was identified through meetings and/or outreach related to a larger planning effort. |
| 0% |  | No outreach has led to the selected of this project. |

RESPONSE: (Limit 2,800 characters; approximately 400 words):

SCORING GUIDANCE (130 Points)

The applicant with the most points on the Risk Assessment (more points equate to less project risk) will receive the full points for the measure. Remaining projects will receive a proportional share of the full points. For example, if the application being scored had 40 points and the top project had 70 points, this applicant would receive (40/70)\*50 points or 29 points.

## Cost Effectiveness (100 Points)

This criterion will assess the project’s cost effectiveness based on the total TAB-eligible project cost and total points awarded in the previous criteria.

1. MEASURE: This measure will calculate the cost effectiveness of the project. Metropolitan Council staff will divide the number of points awarded in the previous criteria by the TAB-eligible project cost (not including noise walls).

* Cost effectiveness = total number of points awarded in previous criteria/total TAB-eligible project cost (not including noise walls)

RESPONSE: (This measure will be calculated after the scores for the other measures are tabulated by the Scoring Committee):

* Total Project Cost (entered in Project Cost Form):\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (automatically calculated)
* Enter amount of Noise Walls: \_\_\_\_\_\_\_\_\_\_
* Points Awarded in Previous Criteria: \_\_\_\_ (entered by Metropolitan Council staff)

|  |
| --- |
| SCORING GUIDANCE (100 Points)  The applicant with the most points (i.e., the benefits) per dollar will receive the full points for the measure. Remaining projects will receive a proportional share of the full points. For example, if the top project received .0005 points per dollar and the application being scored received .00025 points per dollar, this applicant would receive (.00025/.0005)\*100 points or 50 points.  The scorer for this measure will also complete a reasonableness check of the total project cost that is used for this measure. The scorer may follow up with the applicant to clarify any questions. Up to 50 percent of points awarded for this measure can be deducted if the scorer does not believe that the cost estimate is reasonable. |

TOTAL: 1,100 POINTS