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Via Email and Regular Mail
Steve A. Watts
New York State Department of Environmental Conservation
47-40 21st Street
Long Island City, NY 11101-5407

Re: Draft State Pollutant Discharge Elimination System Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems owned or operated by the City of New York.

Dear Mr. Watts:

The City of New York ("City") submits the following comments on the Draft State Pollutant Discharge Elimination System ("SPDES") Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems ("MS4") owned or operated by the City ("Draft Permit"). The City appreciates the Department of Environmental Conservation's ("DEC") concerted effort to coordinate with the New York City Department of Environmental Protection ("DEP") to develop this Draft Permit. As reflected in our comments below, the City is committed to developing and implementing the extensive requirements of this permit in order to address stormwater discharges from the City's separately sewered areas.

The City has also had the opportunity to consider the comments raised at the public information session on March 5, 2014 made by a number of interested parties and takes this opportunity to provide its view on some of the issues presented. The City looks forward to discussing any further comments offered, and to working closely with DEC on its implementation of its MS4 program.

A. The City's Investment in Water Quality

The City is currently in the midst of an unprecedented period of investment to improve water quality in New York Harbor; since 2002, DEP alone has spent approximately $10 billion on projects which have been completed or are underway including wet weather expansion at the City's wastewater treatment plants, aggressive nutrient removal, billions of gallons of

combined sewer overflow ("CSO") green and grey infrastructure projects, marshland restoration in Jamaica Bay, and numerous other projects. These projects—which have been nearly 100% funded by New York City residents through rate payer funds—have resulted in significant reductions in combined sewer overflows and in nitrogen discharges from our wastewater treatment plants, and have moved the City toward the goals in PlaNYC, which serves as the blueprint for a sustainable New York City. As a result of this work, New York Harbor is healthier than it has been at any time in the last 100 years. One benefit of this success is that more of New York Harbor than ever before is available for recreation and the other use goals set out in the Clean Water Act.

Our recent successes are significant milestones in the effort to continuously improve water quality, but they have come at a very substantial cost to New Yorkers. Since January 2002 alone, water rates have increased by 164%, in large part to fund federally and state mandated projects, and also due to a steep decline in federal and state funding to support such projects. In implmenting federal and state mandates, we need to be sensitive to the additional costs imposed on our ratepayers and make sure scarce dollars are invested wisely.

B. The City Supports the Programs Set Forth in the Draft Permit as a Next Step to Further Improve Water Quality

The Draft Permit applies to the approximately 40% of the City's land area that is served by the MS4 or by direct drainage, with the rest of the City served by the combined sewer system. The City's sewer system includes over 7,500 miles of sewer pipes of varying size (consisting of combined, sanitary and separate storm sewers) and approximately 148,000 catch basins. Every year, New York City has approximately 45 inches of precipitation, generating an average of 165 billion gallons of stormwater runoff. Approximately half that rainfall/snowmelt makes its way into the City's combined sewer system, with much of the balance flowing directly into surrounding waterways through the City's MS4. Currently, DEP's separate sewer outfalls are incorporated into the SPDES permits for the 14 wastewater treatment plants. The Draft Permit, for the first time, implements City-wide MS4 system requirements to manage urban sources of stormwater runoff into the MS4.

The City recognizes that the Draft Permit reflects a next step toward improving water quality in New York Harbor. At this early stage, it is premature to judge which permit elements may prove to be most beneficial. Given the fact that the implementation of this permit will require a significant commitment of time and resources by a large array of City agencies and departments, the City requires the maximum flexibility to expand its current efforts and believes that the current Draft Permit takes a reasonable approach to affording the City such flexibility while ensuring the City moves forward expeditiously with its terms.

Broadly, the Draft Permit includes the required minimum control measures to address sources of pollutants and their means of entry into the MS4. It requires the City to develop a detailed Stormwater Management Program Plan ("SWMP") that addresses the requirements for public education and participation, illicit discharges, construction sites and municipal facilities and operations. In addition, the Draft Permit requires an industrial user and industrial source control program and a floatables control program. The Draft Permit contains an aggressive, but achievable, schedule requiring the City, after the effective date of the permit

("EDP"), among other things, to: submit a complete SWMP plan within three years; complete a preliminary map of the MS4 drainage area within three years and a final map within five years; establish and maintain an inventory of post-construction stormwater management practices within three years; prepare an inventory of industrial and commercial facilities that that are possible pollutant sources and develop an inspection plan to assess these facilities within three years; develop an inspection program for SPDES Multi Sector General Permit ("MSGP") facilities within three years; submit a draft workplan for determining the amount of floatables discharged from the MS4 to floatables-impaired waterbodies within two years and a final work plan within three; certify the development of a Consolidated Information Tracking System and develop a monitoring and assessment program within three years and implement the program within five years. *See* Draft Permit § IV.O (listing the time-frame for all deliverables under the Draft Permit).

Complying with these requirements will require detailed, resource-intensive, and sustained efforts from numerous City agencies and departments. Recognizing the need for extensive coordination, New York City Executive Order No. 429 of 2013, "Coordination and Implementation of Matters Pertaining to Stormwater Controls and Municipal Separate Storm Sewer System Permit Requirements," directs DEP to coordinate the efforts of City agencies with respect to all matters related to the City's stormwater SPDES permit requirements and requires all relevant City agencies and entities to facilitate compliance with SPDES permit requirements. The interagency coordination required by Executive Order No. 429 is already well underway with regular interagency task force meetings to plan for implementation of the Draft Permit's requirements. DEP has also already started the lengthy and complex process of mapping the MS4 drainage area, which is a vast undertaking with major implications for the regulated community, and includes both the City's own municipal operations and the owners and operators of construction sites and industrial facilities that come within the regulatory scope of the MS4 program. *See* Draft Permit § IV.C. To more accurately delineate the MS4 boundary, the City will have to do refined analyses to ensure accurate compliance with the permit requirements.

C. Detailed Comments

(a) Public Participation

The Draft Permit requires the SWMP to include a robust public education and outreach component through development and implementation of a public involvement/public participation program. *See* Draft Permit § IV.A, B. As part of this requirement, the City has to, and is committed to providing, the opportunity for the public to meaningfully participate in the development, implementation, review and major revision of the SWMP. *Id.* § IV.B(2)(d). The Draft Permit, appropriately, does not prescribe the exact form of public outreach and participation, but rather requires the City to propose a public outreach plan in the draft SWMP, subject to DEC review and approval.

The City intends to build on the public outreach and participation successes and lessons learned from the many other DEP water quality public outreach and participation efforts. The flexibility to develop a meaningful, effective and iterative public participation process is essential to ensuring that this input ultimately benefits the public and the City. The City already plans to convene a steering committee modeled on the success of the Green Infrastructure

Steering Committee; this steering committee will focus on, among other things, MS4 and SWMP development. However, the City believes the Draft Permit takes the correct approach in affodaing the City the flexibility to design the most effective outreach program rather than mandating a specific outreach or coordination strategy.

To the extent that commenters on the Draft Permit suggest that pursuant to 33 U.S.C. § 1342(a), DEC must solicit formal public comment through an additional public notice process before approving the final SWMP because the final SWMP is functionally equivalent to a permit, this suggestion lacks merit. As decided in *Natural Resources Defense Council, Inc. v. New York State Department of Environmental Conservation* the requirement of 33 U.S.C. § 1342(a) is satisfied by public comment and the opportunity for a hearing on the Draft Permit itself. 111 A.D.3d 737, 747 (2d Dep't 2013). While public participation in the development of the SWMP is important, and the City will encourage robust participation, formal public comment and the opportunity for a hearing before DEC is not legally required and should not be mandated in the permit.

(b) Impaired Waters

The Draft Permit's approach to discharges to impaired water is appropriately in line with the requirements in the *SPDES General Permit for Stormwater Discharges from MS4s*. Under the Draft Permit, if a discharge authorized under the permit is later determined to cause, or have the reasonable potential to cause or contribute to, the violation of an applicable water quality standard, the City must take all necessary action to ensure future discharges do not directly or indirectly cause or contribute to the violation of a water quality standard and must document these actions in the SWMP. Draft Permit § II.A. The City must ensure no net increase of pollutants of concern causing the impairment from non-negligible land use changes or changes to stormwater management practices within the MS4 area draining into the impaired water. *Id.* § II.B.1. The Draft Permit also contains provisions requiring the City to take appropriate actions to insure specific pollutant reductions are achieved if a TMDL is approved for any waterbody or watershed. *Id.* § II.B.2.

To the extent any commenters on the Draft Permit suggest that the final permit should impose a stricter requirement than a no net increase standard for discharges to impaired waters, meeting such a requirement is not feasible at this time. The Draft Permit includes a host of requirements, such as public education, illicit discharge detection and elimination, post-construction stormwater management, and pollution prevention and good housekeeping of municipal operations, which are intended to reduce the discharge of pollutants of concern into impaired waters. Achieving these requirements in the time-frame set forth in the Draft Permit will require significant City resources, and stricter requirements are unwarranted, particularly since neither the City nor DEC has had a chance to evaluate the effectiveness of the programs that will be implemented under the Draft Permit. Moreover, the monitoring and assessment required by the Draft Permit will provide the necessary baseline to determine whether additional controls may be warranted to comply with Clean Water Act requirements in the future.

(c) Industrial and Commercial Stormwater Sources

The Draft Permit includes a provision requiring the development of a plan to require certain industrial and commercial facilities, which are not subject to the requirements of the SPDES Multi Sector General Permit or an individual SPDES permit but which generate significant contributions of pollutants of concern to impaired waters, to select, install, implement and maintain cost-effective stormwater control measures. *See* Draft Permit § IV.H.2. Thus, the City will be required to develop a regulatory program for these facilities even though they are not subject to any existing SPDES requirements under state law.

This provision goes beyond the legal requirements for MS4 permits and creates an unnecessary additional burden on the City in carrying out the MS4 program, and it should be deleted from the Draft Permit. Unlike the Draft Permit prepared for the City, DEC's MS4 General Permit (Permit No. GP-0-10-002) exempts from that permit's requirements stormwater associated with industrial activity that is effectively addressed by and in compliance with a different SPDES general permit or an individual SPDES permit. *See* MS4 General Permit Part I.C.1. Thus, the MS4 General Permit recognizes that DEC's existing SPDES permitting programs for industrial stormwater sources provide an appropriate level of control for these facilities. By contrast, the Draft Permit requires the City to go further, and begin regulating a class of industrial and commercial facilities that have never before been subject to SPDES stormwater requirements. This requirement is in addition to Section IV.H.3 of the Draft Permit, which requires the City to develop an inspection program for facilities that are subject to the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity. Presumably, in issuing the Multi-Sector General Permit and individual SPDES permits to various industrial facilities, DEC has already determined that the industrial stormwater sources covered by those permits are significant contributors of stormwater pollution, and should be subject to regulations. However, DEC has made no such determination for industrial and commercial facilities that are not subject to those permits' requirements. Requiring the City to create a new class of regulated facilities under the auspices of the MS4 program will substantially add to the overall burden of developing an effective and successful SWMP. Therefore, the City recommends deleting Section IV.H.2 from the Draft Permit in its entirety.

(d) Size Threshold for Construction and Post-Construction Stormwater Controls

The Draft Permit requires the City to develop, implement and enforce a program for controlling runoff to the MS4 from construction activities that result in a land disturbance of one acre or greater, or construction activity disturbing less than one acre if the construction activity is part of a larger common plan of development or sale that would disturb one acre or more. Draft Permit § IV.E. The Draft Permit also requires the City to develop, implement and enforce a program that requires post-construction run-off controls for each applicable land disturbing activity to reduce pollutants of concern to the maximum extent practicable, and to establish and maintain an inventory of post-construction stormwater management practices within the MS4. *Id.* § IV.F. The City's permitting programs are required to provide protection equivalent to the NYS General Permit for Stormwater Discharges from Construction Activity (GP-0-10-001). *Id.* §§ IV.E(1)(a), IV.F(1)(a).

Developing, implementing and enforcing these programs require a new and ongoing commitment of City resources. Some commenters, however, have suggested that the one acre threshold for construction activity is too high and that the size threshold should be reduced to as little as 5,000 square feet. In response to these comments, DEP conducted a preliminary analysis comparing the number of lots that would be subject to the provisions of §§ IV.E and F for the current one acre size threshold and for three smaller sizes: a half an acre (20,000 square feet), 15,000 square feet and 5,000 square feet. In order to develop these estimates, DEP analyzed building permit applications submitted for the period January 1, 2009 to December 31, 2013; this period includes several years of lower than average real estate development, meaning the analysis likely underestimates the actual permit applications that will be subject to the new requirements as the City's program is implemented in coming years. The results of the analysis are annexed to this letter as Appendix A. Based on DEP's analysis, and for the additional reasons set forth below, the City opposes any reduction of the one acre threshold as unnecessary and unwarranted.

DEP's analysis demonstrates that a reduction of the size threshold to even a half an acre would nearly double the number of lots that would require coverage under the construction stormwater program, from an estimated 175 lots using the one-acre size threshold to 347 using a half an acres size threshold in any given year. Such an increase would also correspondingly increase the number of sites requiring post-construction monitoring in the following years. Moreover, the analysis indicates than the number of lots subject to the current one acre threshold is much higher than projected by the Natural Resources Defense Council (175 as opposed to 77). *See* Appendix A. As a technical matter, the water quality improvements related to reduced acre thresholds are not well documented and thus do not warrant the additional public/private investments that a reduced threshold would require.

Next, even using the existing one acre threshold, the development of a compliance framework for these MS4 requirements will be a complicated and resource intensive task. Not only must the City develop the review and compliance framework, but it must also provide guidance to the regulated community on how to achieve the new standards, provide resources and standards for the review of permit applications, set up a procedures for receipt, response, and resolution of complaints and other inquiries from the public, develop procedures for site inspection by trained inspectors, and establish an inventory of active construction sites that trigger the stormwater requirements. *Id.* § IV. Moreover, various existing site constraints in New York City, such as existing sewer and gas pipes and other underground infrastructure, and areas with a high groundwater table, urban fill, and shallow bedrock, can considerably limit the number of feasible locations for installing post-construction controls, particularly for roadway projects, while the City's costly development context can also make implementation of such controls challenging. The City must ensure that any program requiring implementation of controls on a site-by-site basis can prescribe practices that are effective in improving the quality of discharge and feasible to construct. The Draft Permit allows the City to develop a banking or credit system to accommodate site conditions (*see* § IV.F(h)); the City will need to develop a flexible framework for implementation of post-construction controls in the SWMP. Ensuring that practices are cost effective and that they achieve the desired water quality results are critical first steps before considering imposing additional requirements on sites less than one acre in size.

A reduction of the one-acre size threshold would also impose additional burdens on the regulated community, affecting both private construction and City agency projects. It is improper to impose an additional requirement on the regulated community without notice and the opportunity to comment on such a significant requirement. Public comment on this topic from the private sector would be especially important for DEC to understand the potential economic impacts of any reduction, and such comments have not been sought in connection with the current Draft Permit.

Some commenters have suggested that the lower size threshold for construction activities currently used in other cities such as Philadelphia and Washington, DC should also apply to New York City. However, as we understand these programs, these smaller cities did not start out regulating at the lower size threshold for construction activities, but rather developed them as their MS4 programs developed and matured over time. In addition, development in these cities occurs under different geographic and economic conditions as compared to New York City.

Finally, a reduction in the size threshold in this permit would create inconsistent regulations and permitting between sites/lots located in direct drainage areas and those in the rest of the City because lots in direct drainage areas would still be regulated under the State General Permit where the one acre rule applies. For these reasons, DEC should retain the current one acre threshold in the Draft Permit.

(e) Integrated Management

As stated in the Draft Permit, the intent of the Permit is to "manage urban sources of stormwater runoff to protect overall water quality and improve water quality in impaired waters as part of a comprehensive integrated planning approach that considers non-MS4 sources and planned controls for those sources." Draft Permit § 1.A. Under the Draft Permit the SWMP must include "a comprehensive integrated planning approach" and the measureable goals of the SWMP should be chosen using this integrated approach. *Id.* § IV, VI.B. The baseline data and analysis of current loading conditions required by the Draft Permit will provide an essential first step toward further integrated planning. By recognizing that an integrated planning approach is appropriate for the SWMP and allowing the City to develop that approach during the first three years of the permit, the Draft Permit provides this critical flexibility. A final permit that explicitly mandated other water quality efforts and required the City to achieve the complex task of integrating such efforts before a final SWMP is adopted—as some might urge—would unnecessarily mire the development of the SWMP in the resolution of other Clean Water Act compliance matters, particularly since those matters are generally managed primarily by DEP, whereas the Draft Permit requires a citywide strategy with input and participation from numerous City agencies.

(f) Accommodating Emergency Situations

Although the Draft Permit does not explicitly address the provision of emergency services, the City anticipates that the SWMP will include provisions recognizing the need for flexible implementation of stormwater BMPs during emergency situations and asks, therefore, that DEC reasonably accommodate the need to balance stormwater controls with safe and effective emergency response during its review of the City's SWMP.

D. Conclusion

The City urges DEC to issue as final the Draft Permit in its current form with the proposed deletion of Section IV.H.2 set forth above. We look forward to working with DEC, the regulated community and other stakeholders to further improve water quality through implementation of the permit conditions.

Sincerely,

/s/
Sarah Kogel-Smucker
Senior Counsel
Environmental Law Division

cc: Susan Amron, Chief, Environmental Law Division, New York City Law Department
Julian Bazel, Counsel to the Department, New York City Fire Department
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John Rousakis, General Counsel, New York City Department of Environmental Protection
Andrew Schwartz, First Deputy Commissioner, Department of Small Business Services
David Varoli, General Counsel, New York City Department of Design and Construction

APPENDIX A

New York City Department of Environment Protection ("DEP")
Bureau of Environmental Planning and Analysis ("BEPA")

Analysis of Lots Covered by Draft MS4 Permit §§ IV.E & F Size Thresholds
4/7/2014

The following is a preliminary analysis of the number of lots that would be covered by the Draft State Pollutant Discharge Elimination System ("SPDES") Permit for Stormwater Discharges from Municipal Separate Storm Sewer Systems ("MS4") owned or operated by the City ("Draft MS4 Permit") §§ IV.E & F (Construction Site Stormwater Runoff Control and Post-Construction Stormwater Management) for four different size thresholds. The tables compare the City of New York ("City")'s analysis with the results of the analysis provided by NRDC on March 17, 2014. As noted below, the City's analysis results in a greater number of sites being subject to the construction and post-construction controls under the Draft MS4 Permit at the lower thresholds than the NRDC analysis. It is also important to note that while some of the same data sources may have been used for both analyses, it is evident that different methodologies were employed to calculate figures corresponding to different size thresholds. Thus further information would be needed from NRDC to explain significant variation in the results. Notwithstanding, based on the City's analysis, and for the reasons stated in the City's comments on the draft permit dated April 7, 2014, the City believes retaining the one acre size threshold in the Draft MS4 Permit is appropriate, whereas reducing the threshold below one acre would be unduly burdensome and would create inconsistent obligations for construction sites located in the direct drainage areas versus the MS4.

Methodology

A. Lots Analysis (Pluto Data)

1. Removed LandUse code "9" (Open Space)
2. Methodology for Property ownership same as NRDC's methodology as outlined in "*lot sizes by drainage area – 2-15-14*". C and O used for "Public" ownership, M, X, P, and Blank used for "Private" ownership.
3. The definition of "Other" for drainage type is anything that the City is not responsible for or has not yet defined and includes cemeteries, federal lands, airports, etc.

B. NYC Department of Building (DOB) Permit Analysis

1. 5 year totals comprised years 2013-2009. Each year consists of Jan-Dec.
2. Current Issued permit was used for date, not First permit issued.
3. Removed LandUse code "9" (Open Space)
4. Methodology for Property ownership same as NRDC. C and O used for "Public" ownership, M, X, P, and Blank used for "Private" ownership.

Scenario 1: Lots >1 acre

A. In any given year projected lots that could be affected by the Draft MS4 Permit §§ IV.E & F based on Pluto Data (i.e., total number of lots in the MS4 area that meet the size threshold of >1 acre):

	Cumulative Area (acres)				Number of Lots			
	CITY		NRDC		CITY		NRDC	
Drainage Type	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Direct Drainage	3,671	2,760	4,137	2,990	942	431	1,217	478
Separate	6,542	3,269	4,126	5,304	1,898	682	1,493	457
Other	3,138	2,782	543	213	495	167	146	55
TOTAL	13,352	8,811	8,806	8,507	3,335	1,280	2,856	990

B. Existing DOB Permit Analysis, predicted number of sites that would be built or have a major alteration within MS4 drainage area:

	Cumulative Area (acres)				Number of Lots			
	CITY		NRDC		CITY		NRDC	
Drainage Type	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Direct Drainage	993	259	156	112	89	16	44	13
Separate	825	137	142	47	154	21	58	19
Other	294	18	6	11	28	3	3	2
TOTAL	2,112	414	304	170	271	40	105	34

Scenario 2 (~0.5 acre) : Lots > 20,000 ft^2 [1]

A. In any given year projected lots that could be affected by the Draft MS4 Permit §§ IV.E& F based on Pluto data (i.e., total number of lots in the MS4 area that meet the size threshold >20,000 ft^2):

	Cumulative Area (acres)		Number of Lots	
	CITY		CITY	
Drainage Type	**Private**	**Public**	**Private**	**Public**
Direct Drainage	4,031	2,403	1,578	561
Separate	8,065	3,436	4,421	945
Other	3,306	2,799	821	214
TOTAL	15,402	8,638	6,820	1,720

[1] Threshold size data analysis not provided from NRDC

B. Existing DOB Permit Analysis, predicted number of sites that would be built or have a major alteration within MS4 drainage area:

	Cumulative Area (acres)		Number of Lots	
	CITY		CITY	
Drainage Type	**Private**	**Public**	**Private**	**Public**
Direct Drainage	1,013	261	128	19
Separate	927	139	323	24
Other	302	18	46	3
TOTAL	2,242	418	497	46

Scenario 3: Lots > 15,000 ft^2

A. In any given year projected lots that could be affected by the Draft MS4 Permit §§ IV.E & F based on Pluto data (i.e., total number of lots in the MS4 area that meet the size threshold >15,000 ft^2):

	Cumulative Area (acres)				Number of Lots			
	CITY		NRDC		CITY		NRDC	
Drainage Type	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Direct Drainage	4,123	2,818	4,609	3,083	1,844	607	2268	668
Separate	8,736	3,473	5,409	5,409	6,219	1,046	4246	695
Other	3,369	2,807	587	224	1,049	231	245	77
TOTAL	16,228	9,098	10,605	8,716	9,112	1,884	6,759	1,440

B. Existing DOB Permit Analysis, predicted number of sites that would be built or have a major alteration within MS4 drainage area:

	Cumulative Area (acres)				Number of Lots			
	CITY		NRDC		CITY		NRDC	
Drainage Type	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Direct Drainage	1,016	261	167	113	138	20	68	15
Separate	970	140	189	51	434	26	160	25
Other	304	18	7	11	55	3	5	2
TOTAL	2,291	419	363	175	627	49	233	42

Scenario 4: Lots > 5,000 ft^2

A. In any given year projected lots that could be affected by the Draft MS4 Permit §§ IV.E & F based on Pluto data (i.e., total number of lots in the MS4 area that meet the size threshold >5,000 ft^2):

	Cumulative Area (acres)				Number of Lots			
	CITY		NRDC		CITY		NRDC	
Drainage Type	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Direct Drainage	4,655	2,900	5,126	3,114	5,163	777	5,569	857
Separate	16,511	3,587	9,336	5,460	55,359	1,631	31,306	970
Other	3,660	2,818	641	226	3,100	313	637	91
TOTAL	24,826	9,304	15,103	8,800	63,622	2,721	37,512	1,918

B. Existing DOB Permit Analysis, predicted number of sites that would be built or have a major alteration within MS4 drainage area:

	Cumulative Area (acres)				Number of Lots			
	CITY		NRDC		CITY		NRDC	
Drainage Type	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**	**Private**	**Public**
Direct Drainage	1,035	261	177	113	249	21	140	15
Separate	1,287	140	297	53	2,279	29	881	34
Other	317	18	8	11	145	3	16	2
TOTAL	2,640	419	482	177	2,673	53	1037	51