Madison Yards at Hill Farms

Transportation Demand Management Plan (TDMP)

January 15, 2021

Madison Yards Block 6, LLC, in consultation with the project consulting team and City of Madison Staff, has developed this Transportation Demand Management Plan (TDMP) for the Madison Yards at Hill Farms development located in the southwest quadrant of the University Avenue/Segoe Road intersection in Madison, Wisconsin. The Madison Yards redevelopment site is bounded by University Avenue and Old Middleton Road to the north, Segoe Rd to the east, Sheboygan Avenue to the south, and the new State Office Building to the west. The development plan for the site includes the previously completed removal of the former State of Wisconsin Department of Transportation building and future construction of a new mixed-use development including residential, hotel, retail, and office land uses. This TDMP documents bicycle, pedestrian, and transit connections currently available to the area and how users of the site will access those connections. It includes recommendations for transportation demand management strategies that the developer team plans to implement on the site, including providing bike parking, B-cycle stations, and kiosks with information for transit and bicycles. In addition, the memorandum includes recommendations for transportation demand management strategies that will be provided to future designers and tenants of each of the proposed block group within the Madison Yards development.

Commitment

The developer team is committed to creating a comprehensive and proactive TDMP for Madison Yards. Our intent is focused on building a single organization for the entire development to facilitate a shift from driving alone in a car to alternative public and private travel. The development of a TDMP for the site was requested by City of Madison staff and was included as a recommendation in the Traffic Impact Evaluation report completed for the site by Kimley-Horn in December of 2017. This document sets the framework for a comprehensive and proactive TDMP for the Madison Yards development and will be provided to all future designers and tenants. The recommendations in this TDMP are intended to reduce single occupancy vehicle (SOV) trips to/from the site with a goal of achieving a 30% non-SOV (including non-motorized) mode spilt for the development. The developer team will designate a TDM coordinator that will oversee, guide, promote, and monitor TDM activities for Madison Yards. The TDMP coordinator role will be part of the management entity responsible for managing the shared private streets, central green, and other common infrastructure responsibilities for entire Madison Yards development. The full structure of the management entity for the Madison Yards development is defined in the Declaration of Covenants Reservations, Restrictions and Easements for Madison Yards at Hill Farms. The management entity will assess annual fees to all development blocks for their respective share of the private management functions such as snow removal, security, landscaping, TDM implementation, marketing and stormwater maintenance. TDM activities will be used to establish and maintain structures and programs which advocate for alternative modes of transportation.

Existing Multimodal Connections

The development site currently has access to bicycle share and public transit options near the site. There are also nearby bicycle and pedestrian trails, which are accessible from the site. The figures attached display the existing bicycle/pedestrian paths, existing and planned B-cycle stations, existing Metro Transit routes and bus stop locations, and the proposed pedestrian and bicycle circulation during the development site.

PEDESTRIAN

The redevelopment site is located in a walkable urban environment. As shown in **Attachment B** there is a dense network of sidewalks in the study area, and sidewalks are present on all of the study roadways surrounding the site. Crossing locations surrounding the site are currently provided at the intersections of University Avenue & Segoe Road, Segoe Road & Frey Street, Segoe Road & Sheboygan Avenue, Sheboygan Avenue & Eau Claire Avenue, and Eau Claire Avenue & Old Middleton Road. Additionally, a midblock crossing is currently present on the south side of the site along Sheboygan Avenue just east of the driveway to the Park Tower Apartments. The pedestrian infrastructure in the neighborhood has the potential to encourage walk trips to and from the site.

As shown in **Attachment E** the proposed development is planned to be laid out in blocks with interconnecting roadways between the blocks. Sidewalks and pedestrian crosswalks will be provided on the new roads internal to the site, providing adequate pedestrian accessibility within and to/from the site.

BICYCLE

The site is well-situated to promote bicycling as a viable mode of transportation. Existing bicycle paths near the site are shown in **Attachment C**. In addition to these paths, the roadway network surrounding the site is accommodating to cyclists. University Avenue, Old Middleton Road, and Whitney Way have shoulder bicycle lanes in each direction near the site. Segoe Road, Sheboygan Avenue, Eau Claire Avenue, and Midvale Boulevard have wide shoulders for bicycle traffic and onstreet parking. As shown in **Attachment C**, two B-cycle stations are located within a ½ mile radius of the site and a B-cycle station will be located in Block 6 of Madison Yards on the Central Green as shown in Attachment C.

The low-speed internal roadways of the development will provide a comfort level for cyclists traveling to/from origins destinations within the site on bike.

TRANSIT

Transit service in the project area is a strong asset, as Metro Transit has multiple routes that serve the development site area. As shown in **Attachment D** the following transit routes have bus stop locations immediately adjacent to the development site: 2, 8, 10, 12, 15, 28, 37, 38, 56, 57, 70, 71, 72. With the exception of Route 8, which provides weekend service only, all routes provide weekday service. Based on ridership data provide by Madison Metro, 4 of the 12 routes that provide weekday service near within the Madison Yards development currently have estimated average peak loads during the rush hour that exceed the bus capacity of 32 people per bus. Descriptions for each route are provided below and detailed information is provided in **Table 1**.

Proximate Transit Routes

Route 2 is a local route serving Sheboygan Ave, University Ave, UW Hospital, UW Campus, State St, Capitol Square, and Johnson-Gorham areas. The route includes weekday peak service at 15-minute intervals between 6-9:30am and 3-7:30pm, otherwise arriving at 30-minute intervals during all daytime routes (including weekends and holidays) and hour intervals after 9pm. At least one of the weekday average peak loads estimated for this route during the rush hour exceed the bus capacity at stops 2175 and 2376.

Route 8 is a local route between Capitol Square and Spring Harbor, serving State St, UW Campus, University Ave, Sheboygan Ave, and Old Middleton Rd areas. Service is limited to weekends and holidays, arriving once an hour between 7am-10pm.

Route 10 is a local route between Union Corners and Sheboygan Avenue, including stops at East HS, Jenifer St, Johnson-Gorham, Broom-Bassett, UW Campus, University Ae, UW Hospital, and Sheboygan Ave. This route does not include weekend or holiday service, and does not run at times when UW is not in session. Hourly service occurs between E. Washington and E. Gorham between 7am-3:15pm. Increased service occurs near campus between 7:30am-9pm, with buses arriving approximately every 10 minutes during peak hours and every 30 minutes during non-peak hours.

Route 12 is a local route between Dutch Mill Park & Ride and Capitol Square operating only during weekday peak hours (6:00am - 9:00am and 3:00pm - 6:00pm). It serves Lake Point Drive, Alliant Energy Center, Capitol Square, State St, UW Campus, and University Ave areas.

Route 15 is a local route between Junction Ridge and Capitol Square including stops at areas such as Prairie Towne Center, High Point Rd, Old Sauk Trails Office Park, Greenway Station, Old Middleton Rd, Sheboygan Ave, University Ave, UW Campus, State St, Capitol Square, East Washington Ave, Metro Administration Facility, East HS, and Milwaukee St. Weekday service arrives approximately every 30 minutes between 5:30am and 10:45pm. This route does not include weekday or holiday service. At least one of the weekday average peak loads estimated for this route during the rush hour exceed the bus capacity at stops 2370 and 2513.

Route 28 is a local route connecting Johnson-Gorham, UW Campus, Observatory Drive, UW Hospital, and University Ave areas. Service occurs during weekday peak hours and runs approximately every 15 minutes between 5:30- 9:30am and between 2:30-6:30pm.

Route 37 is a local route with service only during weekday peak hours and only in the peak direction between Sheboygan Ave and Pflaum Rd, serving University Ave, UW Campus, State St, Capitol Square, E Washington Ave, Metro Administration Building, Atwood Ave, Buckeye Rd, and Dean Clinic East. On weekday service days, the route operates in the Pflaum Road direction approximately every 15 minutes between 6:45-10am and in the Sheboygan Avenue direction between 3:30-6pm.

Route 38 is a local route travelling between Plfaum Rd and UW Campus/Sheboygan Ave. It includes stops at LaFollette HS, Turner Ave, Atwood Ave/Oakridge Ave, Jenifer St, Wilson St, Broom-Bassett, UW Campus, Observatory Dr, UW Hospital, and University Ave areas. Service is exclusive to peak hours and in the peak direction only. The route arrives every 15 minutes between 5:30-9:30am in the

morning in the Sheboygan Avenue direction and from 2:45-6:45pm in the evening in the Pflaum Road direction.

Route 56 is a local route serving East Pass, McKenna Blvd, Reetz Rd, Whitney Way, Sheboygan Ave, UW Campus, State St, Capitol Square, E Washington Ave, Metro Administration Facility, East HS, and Commercial Ave. It has limited stop service between the West Transfer Point and UW Campus. Service occurs only during morning and evening peak hours, approximately every 30 minutes between 6-8am and between 4-6pm.

Route 57 is a local route serving East Pass, Muir Field Rd, Piping Rock Rd, Whitney Way, Sheboygan Ave, UW Campus, State St, Capitol Square, E Washington Ave, Metro Administration Facility, East HS, and Commercial Ave, with limited stop service between West Transfer Point and UW Campus. Service is limited to peak hours, occurring approximately every 30 minutes between 6-8:30am and between 4-6:30pm. At least one of the weekday average peak loads estimated for this route during the rush hour exceed the bus capacity at stop 2175.

Route 70 is a local route between Middleton and Capitol Square, including stops at State St, UW Campus, University Ave, Spring Harbor, Marshall Park, Century Ave, Donna Dr, Branch St-Terrace Ave-Discovery Springs, and Greenway Station. Service is available on weekdays, arriving every 30 minutes between 5am-11:30pm.

Route 71 is a local route between Middleton and Capitol Square serving State St, UW Campus, University Ave, Spring Harbor, Marshall Park-Terrace Ave/Parameter St-Discovery Springs, and Greenway Station areas, with limited service between Whitney Way and the UW Campus. Service is limited to peak hours and occurs approximately every 30 minutes between 6:30-8:30am and between 4-5:30pm.

Route 72 is also a local route between Middleton and Capitol Square. It serves State St, UW Campus, University Ave, Spring Harbor, Marshall Park-Terrace Ave/Parameter St-Discovery Springs, and Greenway Station areas. It has limited service between Whitney Way and the UW Campus. Service occurs during peak hours only and arrives at approximately 30-minute intervals between 6:15-8:30am and between 4-5:30pm. At least one of the weekday average peak loads estimated for this route during the rush hour exceed the bus capacity at stop 2370.

TDMP Strategies

The following sections describe the recommended transportation demand management strategies for the proposed Madison Yards development.

SITE WIDE / GLOBAL

The following items are committed to be provided within the site. Specific information for each of these items, designed to support the reduction of SOV trips, will be provided as part of Specific Implementation Plans that will be individually approved for each phase of the development.

- Kiosks/Posting Areas with transit and bicycle information throughout the site.
- Well-defined bus stops on Sheboygan Avenue and Segoe Road.

- A B-cycle station will be centrally located in Block 6 of Madison Yards on the Central Green. The Station will initially consistent of 5 docks and 3 Bcycles with the ability to grow as the site develops.
- Dedicated areas for indoor and outdoor bike parking within the site.
- Dedicated preferred parking stalls for rideshare a car sharing program (e.g. UBER, Lyft, HOURCAR, Zipcar) within the site.
- A comprehensive parking enforcement strategy will be implemented to enforce posted parking restrictions and prevent daily employees from parking in short-term retail/commercial spaces.

TDM COORDINATOR

The ownership entity for the private streets, central green, and infrastructure (currently, Lot 6) will designate a coordinator role within the operations team to manage TDM activities for the entire Madison Yards development. Each block will be assessed annual fees to fund the TDM program as well as to maintain common development items, including bus shelters, B-cycle stations, parking enforcement, storm water, and private law enforcement for the development. The TDM coordinator will have the following responsibilities:

- Serve as the liaison to the Madison TDM Coordinator, Madison Traffic Engineering and Planning Departments regarding the TDMP including provide Madison staff with updated contact information if the coordinator were to change.
- Collect and report performance metrics to the City on an annual basis (metrics are defined in the *Performance Metrics* section of this document) for five years following the completion of each phase of the development
- Review and evaluate the effectiveness of the TDM strategies being implemented within the development against the collected performance metrics and 30% non-SOV mode spilt goal. Communicate the results to Madison TDM Coordinator, City Traffic Engineering, Madison Metro, and Ped/Bike coordinators
- Provide the TDMP to all future designers of each block group and tenants within the Madison Yards development. Work with each TDM Liaison annually to develop and implement TDM strategies identified for each use within the block group. Provide guidance on how to adjust strategies each year based on the results of the evaluation of the collected performance metrics.
- Recommend revisions to the 30% non-SOV mode split goal. Revisions to the goal can be approved by City Traffic Engineering or the City of Madison Planning Commission
- Work with the State of Wisconsin's TDM Liaison to increase state employee and visitor use of alternative transportation.
- Work with entities to organize a bulk purchase program for transit passes.
- Coordinate site-wide promotions for special events and incentives such as Bike to Work Week.

- Meet annually with the Madison TDM coordinator to review current policies and programs.
- Commit to hosting up to two (2) sessions per year where Madison Metro, Rideshare, Etc., shared bike and car providers can come to the site to conduct a commuter fair and educate residents and employees on commuting options.
- Maintain information on transportation alternatives available to residents, guests, and employees through a variety of mediums, including print and online media.
- Serve as a direct contact and resource for residents and tenants who have question about TDM options.

RESIDENTIAL USES

The following are committed to be requirements for all residential projects within the site:

- Separate the cost of residential parking from residential leases, and do not require residents who do not own a car to rent a parking stall as part of their lease.
- Promote biking as a mode of transportation to and from residences by providing bicycle
 amenities, including short-term bicycle spaces for the residents, guests, and employees,
 long-term covered, secured bicycle parking for residents, and a bicycle air/repair station.
- Provide residents the option of subscribing to broadband (fiber or wireless) internet access. Where relevant, provide information and promote telecommuting to residents and employees.
- Residential Project lobbies will have a screen with real-time transit information displayed for routes serving the site (e.g. transitapp, Madison Metro Monitor, or similar)
- Each residential project will designate a TDM Liaison as the point of contact for the TDM Coordinator. The TDM Liaison(s) will work with the TDM coordinator to:
 - Maintain information on transportation alternatives available to residents, guests, and employees through a variety of mediums, including kiosks, posting boards, print and online resources
 - Provide information on car share options available to residents to facilitate travel for individuals that do not have access to a car.
 - Provide orientation packets to new residents, upon move-in, detailing ways to reduce SOV travel, including information on nearby transit and bicycle/pedestrian facilities and amenities. Orientation packets will include the following:
 - A 10-ride, pre-loaded transit card will be offered to each new resident. These passes will promote trial or guest use of the local transit system.

- Information on Wisconsin's Rideshare Program, RIDESHARE, etc. To encourage and match commuter carpools and vanpools since the work or home destination is a commonality.
- Information on the Guaranteed Ride Home program provided through RIDESHARE, etc. The program offers a backup / emergency ride home from work to employees who regularly travel to work via carpool, vanpool, mass transit, or bicycle for up to six times per year.

Information on car sharing and ride sharing programs available to residents (e.g. UBER, Lyft, HOURCAR, Zipcar). Note the location of the designated parking spaces for these vehicles near the site, as well as shared car parking instructions.

- Business card and/or contact information for the TDM Coordinator

In addition, the TDM coordinator will encourage and assist future property managers and owners of residential buildings to do the following:

- Develop and maintain a policy that provides for truck and service deliveries outside of peak traffic periods. This does not include FedEx/UPS-type deliveries.
- Develop and implement an incentive program in order to actively encourage residents, guests, and employees to use alternative modes of transportation.
- Distribute and collect mode share surveys to all residents
- Provide available, parking access control system vehicular trip information to the MPO TDM coordinator and City Staff

RETAIL / COMMERCIAL USES

The TDM coordinator will encourage and assist future business owners and employers to do the following:

- Provide information and promote telecommuting to employees.
- Provide preferential parking for designated rideshare users (carpool or vanpool).
- Develop and maintain a policy that encourages truck and service deliveries outside of peak traffic periods. This does not include FedEx/UPS-type deliveries.
- Designate a TDM Liaison as the point of contact for the TDM Coordinator. The TDM Liaison(s) will work with the TDM coordinator to:
 - Post information on the business website about how to arrive to the retail / commercial via transit & bicycle.
 - Promote biking as a mode of transportation to and from retail / commercial uses by highlighting the site's bicycle amenities, including bicycle parking spaces, Bcycle access and the Central Green bicycle air / repair station.

- Evaluate the possibility of providing transit subsidies to employees to reduce the
 cost of transit by offering prepaid or discounted transit passes to employees.
 Cost sharing can be done in various ways, including employer subsidized, transit
 agency subsidized, shared cost partnerships or variations of each. Federal tax
 law allows employees to receive a transit subsidy (to an IRS maximum) without
 incurring tax liability for the benefit, and Wisconsin offers employers tax credit for
 offering commuting options.
- Maintain information on transportation alternatives available to customers and employees through a variety of mediums, including print and online media.
- Promote special events and incentives such as Bike to Work Week.
- Distribute and collect mode share surveys to all employees
- Provide any available, parking access control system vehicular trip information to the TDM coordinator and City Staff
- Provide orientation packets to employees (consistent with employer communication policies). Packets will detail ways to reduce SOV travel, including information on nearby transit and bicycle/pedestrian facilities and amenities.
 Orientation packets may include the following:
 - Transit passes or a pre-loaded transit card. These passes will promote trial or guest use of the local transit system.
 - Information on Wisconsin's Rideshare Program, RIDESHARE, etc. To encourage and match commuter carpools and vanpools since the work or home destination is a commonality.
 - Information on the Guaranteed Ride Home program provided through RIDESHARE, etc. The program offers a backup / emergency ride home from work to employees who regularly travel to work via carpool, vanpool, mass transit, or bicycle for up to six times per year.
 - Information on ride sharing programs available to employees (e.g. UBER, Lyft). Note the location of the designated parking spaces for these vehicles near the site.
 - Business card and/or contact information for the TDM Coordinator

OFFICE / MEDICAL OFFICE USES

The TDM coordinator will encourage and assist future office and medical employers to do the following:

 Post information on the business website about how to arrive to the office / medical office via transit and bicycle

- Promote biking as a mode of transportation to and from the office / medical office by providing bicycle amenities, including bicycle spaces for employees / visitors and a bicycle air / repair station.
- Provide on-site showers and personal locker facilities for employees.
- Office Project ground floor lobbies will have a screen with real-time transit information displayed for routes serving the site (e.g. transitapp, Madison Metro Monitor, or similar)
- Provide lobby amenities including umbrellas and other items available to facilitate midday walking trips during inclement weather.
- Develop and maintain a policy that encourages truck and service deliveries outside of peak traffic periods. This does not include FedEx/UPS-type deliveries.
- Provide car share options to facilitate travel for individuals that do not drive to work or have access to a car.
- Provide preferential parking for designated rideshare users (carpool or vanpool).
- Consider alternate work arrangements for employees including:
 - Telecommuting: Arrangement for employees to work at remote locations one or more days per week rather than commuting to the work site. Technology plays an important role in telecommuting, since many employees will need to maintain a virtual connection with the worksite in order to access necessary information and/or people.
 - Flexible Work Hours: Employees are allowed to choose their clock-in/clock-out times. Core hours may be required to maintain a certain amount of the work-day for scheduling face-to-face interactions, collaborations, and meetings without conflicting with flexible start and end times.
 - Staggered Work Hours: Good for large facilities where work schedules are regular, causing long arrival and departure lines. Individual groups may be assigned to fixed arrival/departure, typically over a one- to three-hour period.
 - Compressed Work Week: Employees are allowed to work fewer days per week or over a two-week period by increasing the number of hours worked per day. Common schedules:
 - 9/80 (employees work 9 hours per day for a two-week period and get the 10thday off)
 - 10/80 (employees work 10 hours per day for one-week and get the 5th day off)
- Designate a TDM Liaison as the point of contact for the TDM Coordinator. The TDM Liaison(s) will work with the TDM coordinator to:
 - Post information on the business website about how to arrive to the retail / commercial via transit & bicycle.
 - Promote biking as a mode of transportation to and from retail / commercial uses by highlighting the site's bicycle amenities, including bicycle parking spaces, Bcycle access and the Central Green bicycle air / repair station.

- Evaluate the possibility of providing transit subsidies to employees to reduce the
 cost of transit by offering prepaid or discounted transit passes to employees.
 Cost sharing can be done in various ways, including employer subsidized, transit
 agency subsidized, shared cost partnerships or variations of each. Federal tax
 law allows employees to receive a transit subsidy (to an IRS maximum) without
 incurring tax liability for the benefit, and Wisconsin offers employers tax credit for
 offering commuting options.
- Maintain information on transportation alternatives available to customers and employees through a variety of mediums, including print and online media.
- Promote special events and incentives such as Bike to Work Week.
- Distribute and collect mode share surveys to all employees
- Provide any available, parking access control system vehicular trip information to the TDM coordinator and City Staff
- Provide orientation packets to employees (consistent with employer communication policies). Packets will detail ways to reduce SOV travel, including information on nearby transit and bicycle/pedestrian facilities and amenities.
 Orientation packets may include the following:
 - Transit passes or a pre-loaded transit card. These passes will promote trial or guest use of the local transit system.
 - Information on Wisconsin's Rideshare Program, RIDESHARE, etc. To encourage and match commuter carpools and vanpools since the work or home destination is a commonality.
 - Information on the Guaranteed Ride Home program provided through RIDESHARE, etc. The program offers a backup / emergency ride home from work to employees who regularly travel to work via carpool, vanpool, mass transit, or bicycle for up to six times per year.
 - Information on ride sharing programs available to employees (e.g. UBER, Lyft). Note the location of the designated parking spaces for these vehicles near the site.
 - Business card and/or contact information for the TDM Coordinator

Performance Metrics

For the first five years after each phase of the development is completed, the TDM coordinator will collect the following information annually. After the information is reviewed and evaluated, the results will be provided to City of Madison staff.

- Current contact information for each TDM Liaison
- Summary of TDM strategies that occurred within the previous calendar year within the development

- List of on-going strategies currently being implemented within the development
- Number of attendees that attended commuter fairs held within the development
- Number of employers offering prepaid or discounted transit passes
- Summary of mode share survey results for Madison Yards

The mode share survey will be developed in coordination with City staff, and the survey questions will be customized for each block-group based upon its land uses. An example mode share survey provided by the City of Madison, and based on the survey included in Appendix C of the Dane County *Employer's Guide to a Commute Solutions Program* guidebook, is included as **Attachment F**. This survey will be the basis of those developed for each block-group within the Madison Yards development. As such, it is anticipated that the questions included for the Madison Yards surveys will be similar in nature to those included on the attached example.

In addition, a trip generation study will be conducted to track the site's progress towards achieving the 30% non-SOV mode split goal of the General Planned Development. The results will be documented in a brief memorandum and shared with the MPO TDM Coordinator. An initial study will be conducted approximately one year after the first construction project's stabilization (95% occupancy). An update of the study will be conducted in coordination with the MPO TDM Coordinator at the stabilization of each subsequent development block. The proposed methodology for the study as well as an example for how to calculate the number of trips that will meet the target for non-SOV (including non-motorized) trips is included in **Attachment G**.

TDM Resources

The following transportation demand management resources are available for multimodal transportation options and transportation demand within the City of Madison.

- Madison Metro Transit: http://www.cityofmadison.com/metro/
- Madison B-cycle: https://madison.bcycle.com/
- **RIDESHARE**, etc.: https://www.rideshareetc.org/rp2/Home/Home
- Greater Madison MPO
 https://www.greatermadisonmpo.org/rideshare/foremployers.cfm
- Wisconsin DOT Commuter Benefit Program Information for Employers: http://wisconsindot.gov/Pages/travel/road/rideshare/employer.aspx

Attachments

The following attachments are included to supplement this memorandum:

- A. Table 1: Detailed Transit Service Near Madison Yards
- B. Circulation Diagram Pedestrian
- C. Circulation Diagram Bicycle
- D. Circulation Diagram Public Transit
- E. Internal Pedestrian & Bicycle Circulation
- F. City of Madison Example Mode Share Survey
- G. Trip Generation Study Methodology and Example
- H. Current Madison Yards Project Scope
- I. Madison Yards Block 2 TDM Measures Scorecard
- J. Madison Yards Block 3 TDM Measures Scorecard

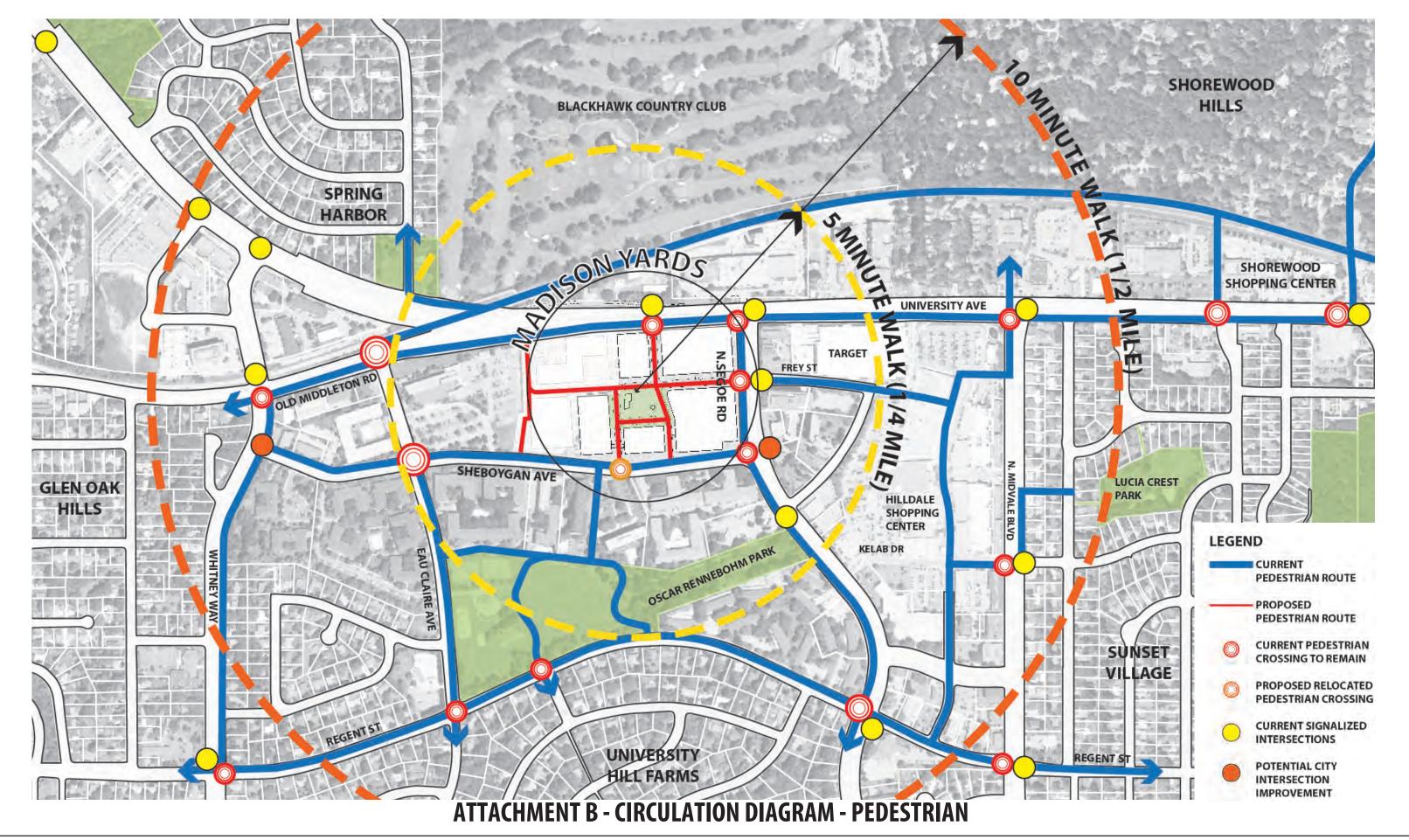
Attachment A: Table 1: Detailed Transit Service Near Madison Yards

	Stops			Weekday A	M Peak (6am – 9:30am)	Weekday	PM Peak (3pm – 7:30pm)	
Route ¹	Near Madison Yards ¹	Direction of Travel	Service Description	Number of Buses Departing Each Stop	First – Last Departure Time² / Approximate Service Headway	Number of Buses Departing Each Stop	First – Last Departure Time² / Approximate Service Headway	
2	2175, 2101, and 2395	North Transfer Point (eastbound along Sheboygan Avenue)	All day on every service	14	6:07am – 9:23am / 15-minute	22	3:07pm – 7:22pm / 15-minute	
2	2184, 2100, and 2376	West Transfer Point (westbound along Sheboygan Avenue)	day	6	6:42am – 9:14am / 30-minute	19	3:01pm - 7:21pm / 15-minute	
8	2175, 2101, and 2395 2184, 2100, and 2376	Capitol Square (eastbound along Sheboygan Avenue) Spring Harbor (westbound along Sheboygan Avenue)	All day on weekends and holidays		No Weekd	lay Service		
10	2175, 2101, 2395, and 2923	Union Corners (eastbound along Sheboygan Avenue)	Weekday service 7:00am – 6:00pm	15	7:11am – 9:22am / 5-minute to 18-minute	19	3:15pm – 7:05pm / 9-minute to 30-minute	
10	2846, 2184, 2100, and 2376	University Row (westbound along Sheboygan Avenue)	Weekday service 7:00am – 10:00pm	5	8:04am – 9:20am / 5-minute to 30-minute	223	3:02pm - 7:10pm / 4-minute to 30-minute	
12	2513 and 2923	Dutch Mill (eastbound along University Avenue)	Weekday service 3:00pm – 6:00pm		No Service	4	4:21pm - 5:50pm / ~30-minute	
12	2370 and 2902	West Transfer Point (westbound along University Avenue)	Weekday service 6:00am – 9:00am	4	6:33am – 7:59am / ~30-minute		No Service	
	2175, 2101, and 2395	East Transfer Point (eastbound along Sheboygan Avenue)		6	6:26am – 8:54am / 15- to 60-minute	8	3:14pm – 7:06pm / 30- to 60-minute	
	2513	East Transfer Point (eastbound along Old	All day service on every	9	7:17am – 9:19am / 15-minute		No Service	
15	2923	Middleton Road/University Avenue)	weekday (limited service	15	6:27am – 9:20am / 5- to 15-minute	8	3:16pm – 7:06pm / 30-minute	
	2846, Ju 2184, (we	Junction Ridge (westbound along Sheboygan Avenue)	in certain areas beyond the site)	7	6:12am _ 00:08am /		6:08pm – 7:26pm / 30- to 60-minute	
	2370 and 2902	Junction Ridge			No Service	10	3:07pm – 5:51pm / 10- to 25-minute	

Route ¹	Stops Near Madison Yards ¹	Direction of Travel	Service Description	Weekday A Number of Buses Departing Each Stop	Buses Time ² / Approximate Departing Service Headway		PM Peak (3pm – 7:30pm) First – Last Departure Time² / Approximate Service Headway	
		(westbound along Old Middleton Road/University Avenue)						
28	2513 and 2923	North Transfer Point (eastbound along University Avenue)	Weekday service 2:00pm - 6:00pm		No Service	8	4:29pm – 6:16pm / 15-minute	
20	2370 and 2902	West Transfer Point (westbound along University Avenue)	Weekday service 5:00am – 9:00am	8	6:31am – 9:07am / 15- to 45- minute		No Service	
37	2175, 2101, 2395, and 2923	Pflaum Road (eastbound along Sheboygan Avenue)	Weekday service 7:00am – 10:00am	2	6:42am – 7:10am / ~30-minute		No Service	
38	2370 and 2902	Sheboygan Avenue (westbound along University Avenue/Old Middleton Road)	Weekday service 5:00am – 9:00am	8	6:01am to 7:59am/ ~15-minute		No Service	
56	2175 and 2101	North Transfer Point (eastbound along Sheboygan Avenue)	Weekday service 6:00am – 9:00am	7	7 6:18am – 9:18am / 30-minute		No Service	
50	2100 and 2376	McKee Road (westbound o along Sheboygan Avenue)	Weekday service 3:00pm – 6:00pm		No Service	6	3:26pm – 5:57pm / 30-minute	
57	2175 and 2101	North Transfer Point (eastbound along Sheboygan Avenue)	Weekday service 6:00am – 9:00am	5	7:04am – 9:03am / 30-minute		No Service	
37	2100 and 2376	McKee Road (westbound along Sheboygan Avenue)	Weekday service 3:00pm – 6:00pm		No Service	5	3:41pm – 5:42pm / 30-minute	
	2923	Capitol Square (eastbound along University Avenue)	Weekday service 5:00am – 6:00am	1	6:30am	6:30am 2 3:39a		
70	2370	Middleton (westbound along University Avenue)	(extended), 9:00am – 3:00pm, and 6:00pm – 11:00pm	1	9:27am	1	6:51pm	
71	2923	Capitol Square (eastbound along university Avenue)	Weekday service 3:00pm - 6:00pm	5	7:00am - 8:57am / 30-minute	4	4:16pm - 5:46pm / 30-minute	

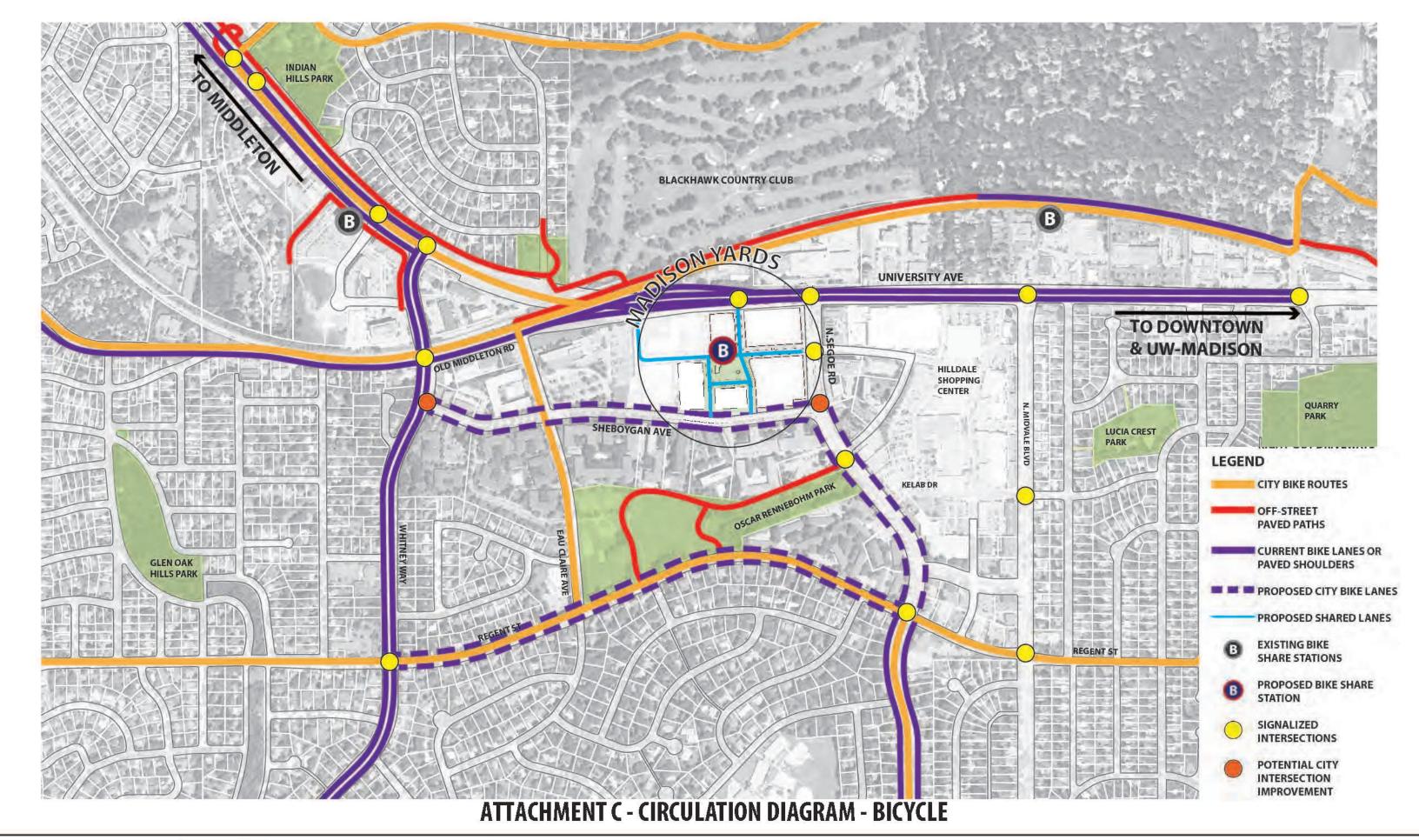
	Stops			Weekday A	M Peak (6am – 9:30am)	Weekday PM Peak (3pm – 7:30pm)		
Route ¹	Near Madison Yards ¹	Direction of Travel	Direction of Travel Service Description Sumber of Buses Departing Each Stop		First – Last Departure Time ² / Approximate Service Headway	Number of Buses Departing Each Stop	First – Last Departure Time² / Approximate Service Headway	
	2370	Middleton (westbound along University Avenue)	Weekday service 6:00am – 9:00am	4	6:35am - 8:05am / 30- minute	6	3:27pm - 5:59pm / 30- minute	
72	2923	Capitol Square (eastbound along university Avenue)	Weekday service 6:00am – 9:00am	6	6:45am - 9:12am / 30- minute	4	4:28pm - 5:58pm / 30- minute	
	2370	Middleton (westbound along university Avenue)	Weekday service 3:00pm – 6:00pm	4	6:55am - 8:21am / 30- minute	7	3:10pm - 6:12pm / 30- minute	

Routes and Stop locations are shown on attached GDP Figure 5
 Within the vicinity of the Madison Yards development, departure time for the first stop and last stop in the direction of travel.
 Bus does not stop at each bus stop during every trip. Some of the bus stops have as low as 12 bus departures during the PM peak.



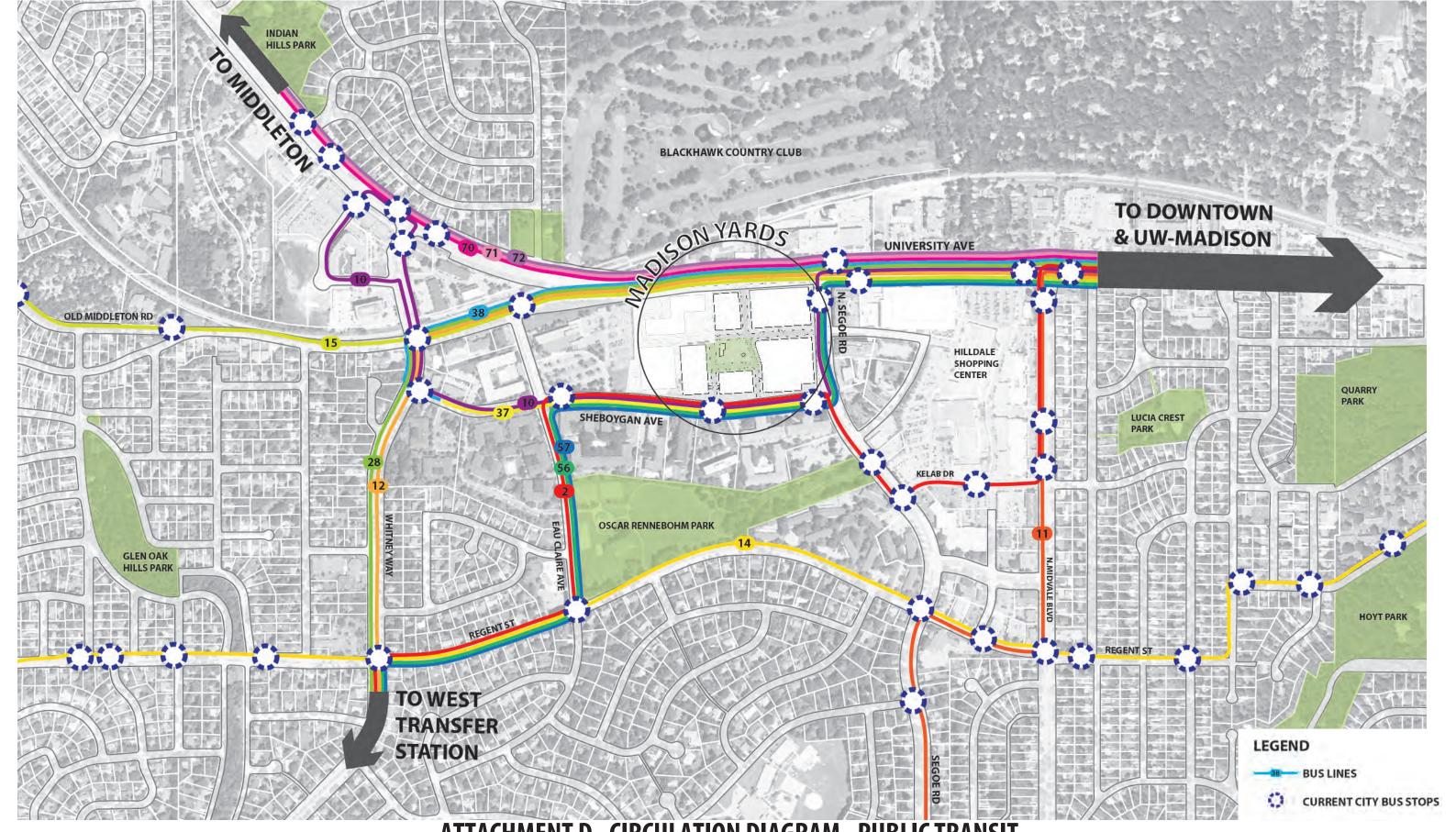








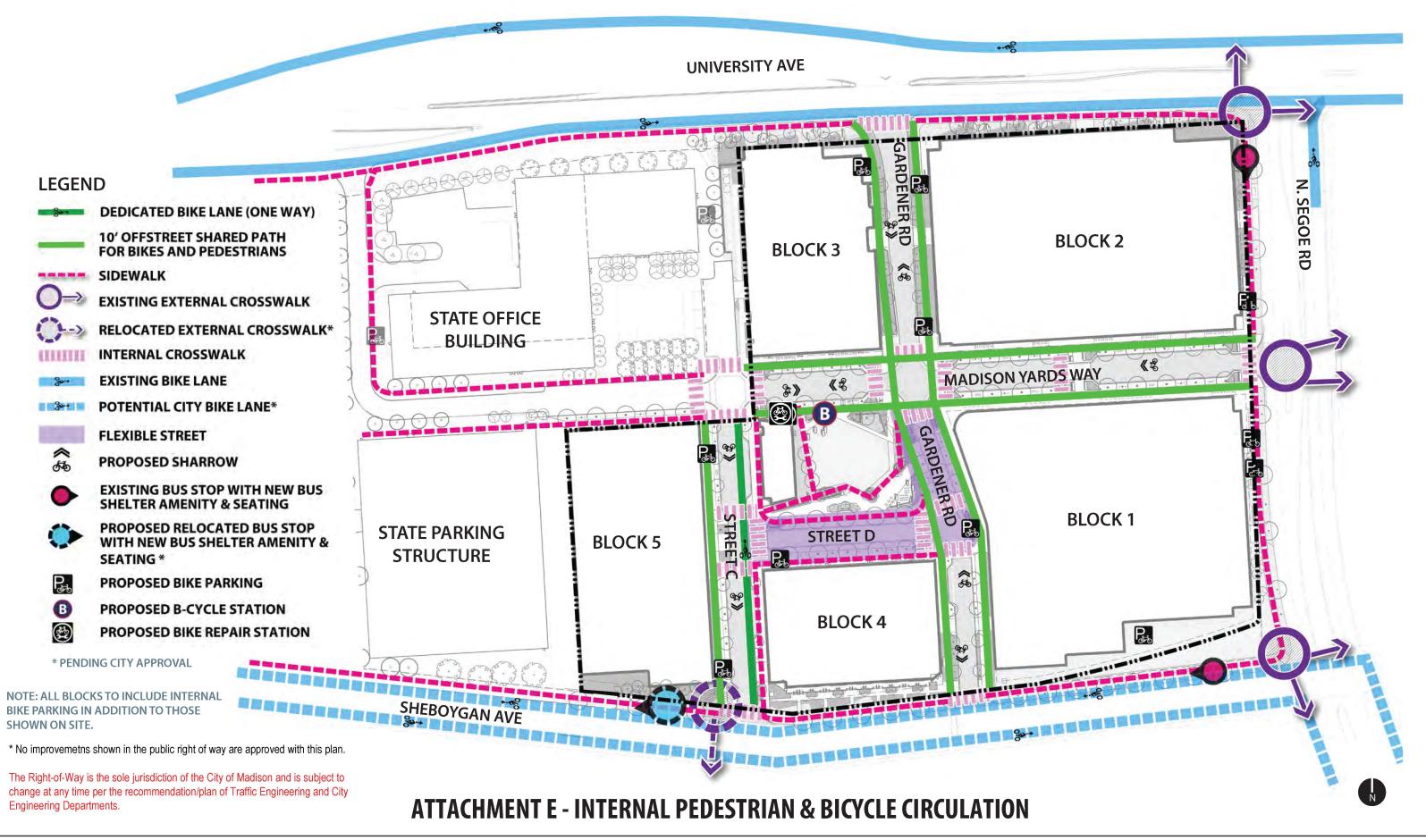
















ATTACHMENT F

Employee Commuting Survey

1. In the prior week, how did you travel to work each day?

N	londay	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday		
		o Transit ool with one ool with two le	other person or more other	F. BicycleG. WalkH. Motorcycle or mopedI. Worked from homeJ. Worked from other locationK. Day Off					
2.	If you di	rove, carpoo	led or vanpoo	oled during t	the week wh	ere did you	park?		
	Paid emp Paid park Free stree	ployee parkin ployee parkin king - not affi et parking lease specify)	g lot iliated with en	nployer					
3.	When do	o you typical	lly:						
Ar De	rive at wo part work	rk? ?		-					
4.	Is there apply)	a time of day	y you find it h	nard to get to	o or from we	ork? (Check	all the		
	Mid mor Late mor Early afte Late Afte Evening	orning (5:00-7) ning (7:00-9) rning (9:00 a. ernoon (noon ernoon (3:00- (6:00-9:00 p. nt (9:00 p.m.	00 a.m.) mnoon) a-3:00 p.m.) -6:00 p.m.) m.)						

5. If you frequently walk, bike, take transit, carpool or vanpool to work, what are your main reasons?

Rank from Very Important to Not Important

- Cost Savings
- Save wear and tear on personal vehicle
- Stress reduction
- Guaranteed Ride Home program
- Time Savings

- Convenience
- Employer offered incentives
- Environmental Concerns
- No or limited access to a car
- Enjoy time spent not driving
- Other (please specify)

6. If you frequently drive alone to work, what are your main reasons?

Rank from Very Important to Not Important

- Need my car at work for company related business
- Need my car at work for personal errands
- Need to run errands before or after work that require a car
- Don't have anyone to ride with
- Prefer to not depend on others
- Need to transport my children
- Safety concerns

- Cannot get home in an emergency
- Parking is free or inexpensive
- Irregular work schedule
- Other options would take too much time
- No reasonable transit option
- Poor bike and pedestrian facilities for your trip
- Other (please specify)

7. What would encourage you to bus, bike, walk, carpool, vanpool to work if you don't already?

Rank from Very Important to Not Important

- Discounted/free parking rates for carpools
- Subsidy for bus fare
- Reserved carpool parking close to building
- Guaranteed Ride Home in case of an emergency
- Child care facilities at or near work
- Help finding people with whom to carpool
- Improved bike route to work

- Higher parking rates for those driving alone
- Financial incentives for not driving to work
- Use of company car during work day
- More flexible work hours
- More fixed work hours
- Change of work shift
- Secure bike parking
- Showers and clothing lockers
- Other (please specify)

	If you drive alone, would you consider using a different option on an occasional basis? Yes No
	Ves, what modes? Check all that you would consider. Carpool Vanpool Metro Transit bus Walk Bicycle
9.	Where do you reside? Address OR
	Nearest street intersection: On Street: At Street:
10.	Please provide any suggestions you have for improving transportation options.

Attachment G: Trip Generation Study Methodology

A trip generation study will be conducted, by a traffic engineering firm, to track the site's progress towards achieving the mode split goal of the General Planned Development. An initial study will be conducted within one year after the first construction project's completion. An update of the study will be conducted, in coordination with the MPO TDM Coordinator, within one year of each subsequent development block's completion. Prior to collecting data, the site's TDM Coordinator and the MPO TDM Coordinator will review the proposed data collection period and methodology. The results of the study will be documented in a brief memorandum summarizing the methodology, findings, and collected data. A draft of the study will be provided to the MPO TDM Coordinator within one month of the data collection period. Once the study is complete, the TDM Coordinators will meet to discuss the results of the analysis.

The following methodology is proposed for the study:

- 1. Coordinate with the MPO TDM Coordinator on the proposed data collection period and methodology. All data collection should occur while school is in session.
- 2. Collect trip generation data for the site
 - a. Collect in and out data for each entry and exit driveway for the development.
 - b. Collect count data over a 72-hour period on a typical weekday (Tuesday, Wednesday, Thursday) while school is in session.
 - c. Estimate the number of trips using on-street parking by developing a ratio between trips generated by off-street parking and the number of off-street parking spaces.
 - d. If desired, use in and out data from available parking access control systems as a substitute for conducting traffic counts.
- 3. Collect vehicle occupancy data for the site
 - a. On one day during the count collection period, track the number of occupants per vehicle for each trip entering and exiting one driveway location per development block during the assumed morning and evening peak hour.
 - b. Assume that single and multiple occupancy vehicles will be equally distributed among all parking locations/driveways and will be consistent throughout the day.
 - c. If desired, the collection of vehicle occupancy data can be omitted, and it can be assumed that all trips are SOV trips.
- 4. Determine the average number of SOV trips traveling to and from the site during the morning peak hour, evening peak hour, and daily.
 - a. Calculate an average of the three days of data and the sum of each data collection location to determine the average number of trips traveling to and from the site for each analysis period.
 - b. Use the collected vehicle occupancy data to determine the percentage of trips during the evening period hour that were SOV trips.
 - c. Multiple the average number of trips by the percentage of SOV trips to develop the number of SOV trips for each study period.
- 5. Estimate the number of trips traveling to and from the site during the morning peak hour, evening peak hour, and daily by using the latest version of the Institute of Transportation Engineers' (ITE's) manual *Trip Generation*. The calculation should be completed using the

- occupied square footage for the on the site on the date that the trip generation data was collected.
- 6. Compare the average number of trips during the data collection period to the calculated number of trips generated by ITE.
- 7. Meet with the MPO TDM Coordinator to discuss the results of the analysis.

Example Trip Generation Target

Based upon the Specific Implementation Plans, Block 3 will be occupied by 189 apartment units and 10,000 square feet of first-floor retail. For the purposes of this example ITE data from the manual, *Trip Generation*, 10th Edition, for LUC 220: Multifamily Housing (Low-Rise) and LUC 820: Shopping Center were used for the calculation. As more specific users become available, LUC 820 can be substituted to better represent the actual tenants within Block 3. The first step of the trip generation study methodology will include a discussion with the MPO TDM Coordinator to determine the best ITE LUCs to use for each tenant of the development.

Table 2 provides an example calculation for the number of trips anticipated for Block 3 as well as the target for SOV and non-SOV (including non-motorized) trips.

Weekday Land Use AM Peak PM Peak Unit Daily Out Out Total Total Apartment (LUC 220) 189 Units 1,390 20 65 85 65 40 105 380 5 5 10 20 20 40 First-Floor Retail (LUC 820) 10,000 sq. ft. 25 95 85 145 Total Trips per ITE 1,770 Goal: Non-SOV: 30% or more 530 20 25 25 40 Goal: SOV Trips: 70% or less 1,240 20 50

Table 2: Example Trip Generation Calculation for Block 3

Although the 10th Edition of the ITE Trip Generation manual includes a land use category for a Mid-Rise Residential building with First-Floor Commercial (LUC 231), the trip generation rates are based on a limited data set of one to two studies. Using LUC 231 to estimate the number of trips generated for Block 3 results in 650 daily trips, 55 morning peak hour trips, and 70 evening peak hour trips, which is roughly half of the trips generated by the LUCs used in the example calculation. The specific LUCs to use for each tenant within the development will need to be agreed upon with the MPO TDM Coordinator as part of the first step of the trip generation study.

Attachment H: Current Madison Yards Project Scope 12/16/2020

	Parking Stalls	Residential Units	Retail / Commercial GSF	Big Box GSF	Office GSF
Block 2	552	273	-	56,000	-
Block 3	200	189	10,270	-	-
Block 6	57	-	5,000	-	-
Total	809	462	15,270	56,000	-

Attachment I: Madison Yards Block 2 TDMP Scoring Analysis 1/15/2021

		Parking	
Project Scope		Spaces	
Residential	273 Residential Units	313	25
Big Box	56,000 GSF	239	28

BASIC MEASURES (B)

S. No.	Measure & Options	Possible Points	Block 2 Points	City Traffic Feedback / Notes
B-1	Designated coordinator & pay program fee	1	1	MY TDM Coordinator
B-2	On-site pedestrian path to sidewalk	1	1	Block 6 Design
B-3	Provide bike parking as per city standards	1	1	All Blocks per City Standards

ACTIVE TRANSPORTATION (AT)

S. No.	Measure & Options	Possible Points	Block 2 Points	City Traffic Feedback / Notes
AT-1	Enhanced access to bike parking	1 to 2		
Option A	Segregated access to bike parking with no stairs	1	1	No stairs required for Bike Parking
Option B	Locational Advantage	1	1	Res Parking Indoors + Grocer
AT-2	On-site pedestrian access - No drive aisle crossing	1	1	Design complies
AT-3	Provide off-site bike facilities (provide ROW and/or funding)	1 to 8		
Option A	Along building frontage	2	0	
Option B	Beyond building frontage	Up to 8	0	
AT-4	Bike User Facilities	2		
Option A	Provide lockers & shower	1	1	okay to break showers/lockers apart and provide one point for each
Option B	Provide bike repair and maintenance facilities	1	0	
AT-5	Provide shared fleet of bikes for on-site users	2	0	NA
AT-6	Provide bike share facility within a 0.25 mile	2 or 3		
Option A	On-site bikeshare kiosk	2	0	
Option B	Provide memberships to employees/residents	3	0	
Option C	Off-site bike-share kiosk open to public	2	2	Bcycle Station on Block 6
AT-7	Provide off-site ped facilities (provide ROW and/or funding)	1 to 8		
Option A	Along building frontage	2	2	points awarded for ROW dedication and sidewalk widening
Option B	Beyond building frontage	1 to 8	0	
AT-8	Provide funding for traffic calming	2	0	Block 6 includes Traffic Calming

HIGH OCCUPANCY VEHICLES (HOV)

S. No.	Measure & Options	Possible Points	Block 2 Points	City Traffic Feedback / Notes
HOV-1	Provide vanpools/shuttle bus	3 to 6		
Option A	Onsite users only	3 to 5	0	
Option B	Open to the public	1	0	
HOV-2	Provide car share/company fleet	1 to 2	0	
Option A	Provide shared fleet of cars	1 to 2	0	
Option B	Provide car-share parking space	2	2	Block 6 Rideshare Space or Residential Parking
Option C	Provide memberships	2	0	
HOV-3	Provide guaranteed ride home	1	0	
HOV-4	Pay for TNC ^[1] rides to BRT ^[2]	2	0	
HOV-5	Provide transit passes or nontaxable subsidy	4 to 8	0	
HOV-6	Contribute to bus facilities (shelters, stations, real-time arrival screens)	1 to 8	4	New Bus Stop on Block 2
HOV-7	Transit ticket validation/One-ride pass (for visitors/students)	2	0	NA

INFORMATION AND COMMUNICATION (IC)

		D 'l- l -	DII- 3	
S. No.	Measure & Options	Possible	Block 2	City Traffic Feedback / Notes
3. NO.	ivieasure & Options	Points	Points	City Hallic Feedback / Notes
IC-1	Marketing campaign	1 to 4		

Option A	Welcome packet and one annual promotional campaign	1	2	Managed by TDM Coordinator. 1 additional point for limited-time transit passes, minimum 10-ride
Option B	Employee orientation and >1 annual promotional campaigns	1	1	Managed by TDM Coordinator
Option C	Personal consultation and financial incentive	1	0	No Incentives
Option D	Information Center	1	1	Managed by TDM Coordinator
IC-2	Multimodal wayfinding signs (usually outside)	1	1	Signage to be provided
IC-3	Real-time bus/shuttle/vanpool arrival screen	1	1	Residential Lobby Screen
IC-4	Participate in city-wide educational and outreach programs	1	1	TDM Coordinator respond and participate in opportunities like bike challenges, rideshare promotions, etc. Probably 1-2 times per year. Could include hosting an on-site event with city staff, like a rideshare sign-up, bikeshare orientation tour, Metrorelated event, etc.

LAND USE AND LOCATION (LU)

S. No.	Measure & Options	Possible Points	Block 2 Points	City Traffic Feedback / Notes
LU-1	Affordable housing	1 to 10	0	NA
LU-2	Walk score	1 to 5	4	86 Walk Score for Weston Place across street
LU-3	Add land use mix	2 to 6		
Option A	Two land uses	2 to 4	4	Two significant uses
Option B	Three land uses	4 to 6	0	NA
LU-4	Provide daycare facilities	2 to 3		
Option A	Off-site facility (within walking distance)	2	0	
Option B	On-site facility	3	0	
LU-5	Provide other specific trip-reducing service	1	0	None assumed
LU-6	Quarter-mile of all-day bus service	3	3	Multiple bus options

PARKING MANAGEMENT (P)

S. No.	Measure & Options	Possible Points	Block 2 Points	City Traffic Feedback / Notes
P-1	Priced parking program	5		
Option A	Cash out for employees	5	0	
Option B	Unbundled for residential	5	5	Uncoupled residential parking
Option C	Charge users a daily minimum amount (all uses)	5	0	
P-2	Shared parking agreement	1 to 2	0	
P-3	Carpool preferential/free parking	1	0	
P-4	Visitor/Student Parking Management	1	0	
0-1	In-Lieu Fee	1 to 37	0	
0-2	Other Innovative Measures	1 to 4	0	

Total Block 2 Mitigation Points

Required 28

40

Attachment J: Madison Yards Block 2 TDMP Scoring Analysis 1/15/2021

Project Scope		Parking Spaces	TDM Point Requirements (Table 1)
Residential	189 Residential Units	189	25
Commerical	10,270 GSF	11	10

BASIC MEASURES (B)

S. No.	Measure & Options	Possible Points	Block 3 Points	City Traffic Feedback / Notes
B-1	Designated coordinator & pay program fee	1	1	MY TDM Coordinator
B-2	On-site pedestrian path to sidewalk	1	1	Block 6 Design
B-3	Provide bike parking as per city standards	1	1	All Blocks per City Standards

ACTIVE TRANSPORTATION (AT)

S. No.	Measure & Options	Possible	Block 3	City Traffic Feedback / Notes
.		Points	Points	on, name coassan, notes
AT-1	Enhanced access to bike parking	1 to 2		
Option A	Segregated access to bike parking with no stairs	1	1	No stairs required for Bike Parking
Option B	Locational Advantage	1	1	Res Parking Indoors + Grocer
AT-2	On-site pedestrian access - No drive aisle crossing	1	1	Design complies
AT-3	Provide off-site bike facilities (provide ROW and/or funding)	1 to 8		
Option A	Along building frontage	2	0	
Option B	Beyond building frontage	Up to 8	0	
AT-4	Bike User Facilities	2		
Option A	Provide lockers with shower	1	1	okay to break showers/lockers apart and provide one point for each
Option B	Provide bike repair and maintenance facilities	1	0	
AT-5	Provide shared fleet of bikes for on-site users	2	0	NA
AT-6	Provide bike share facility within a 0.25 mile	2 or 3		
Option A	On-site bikeshare kiosk	2	0	
Option B	Provide memberships to employees/residents	3	0	
Option C	Off-site bike-share kiosk open to public	2	2	Bcycle Station on Block 6
AT-7	Provide off-site ped facilities (provide ROW and/or funding)	1 to 8		
Option A	Along building frontage	2	2	points awarded for ROW dedication and sidewalk widening
Option B	Beyond building frontage	1 to 8	0	
AT-8	Provide funding for traffic calming	2	0	Block 6 includes Traffic Calming

HIGH OCCUPANCY VEHICLES (HOV)

S. No.	Measure & Options	Possible Points	Block 3 Points	City Traffic Feedback / Notes
HOV-1	Provide vanpools/shuttle bus	3 to 6		
Option A	Onsite users only	3 to 5	0	
Option B	Open to the public	1	0	
HOV-2	Provide car share/company fleet	1 to 2		
Option A	Provide shared fleet of cars	1 to 2	0	
Option B	Provide car-share parking space	2	2	Block 6 Rideshare Space or Residential Parking
Option C	Provide memberships	2	0	
HOV-3	Provide guaranteed ride home	1	0	
HOV-4	Pay for TNC ^[1] rides to BRT ^[2]	2	0	
HOV-5	Provide transit passes or nontaxable subsidy	4 to 8	0	
HOV-6	Contribute to bus facilities (shelters, stations, real-time arrival screens)	1 to 8	2	
HOV-7	Transit ticket validation/One-ride pass (for visitors/students)	2	0	NA

INFORMATION AND COMMUNICATION (IC)

S. No.	Measure & Options	Possible Points	Block 3 Points	City Traffic Feedback / Notes
IC-1	Marketing campaign	1 to 4		
Option A	Welcome packet and one annual promotional campaign	1	2	Managed by TDM Coordinator. 1 additional point for limited-time transit passes, minimum 10-ride
Option B	Employee orientation and >1 annual promotional campaigns	1	1	Managed by TDM Coordinator

Option C	Personal consultation and financial incentive	1	0	No Incentives
Option D	Information Center	1	1	Managed by TDM Coordinator
IC-2	Multimodal wayfinding signs (usually outside)	1	1	Signage to be provided
IC-3	Real-time bus/shuttle/vanpool arrival screen	1	1	Residential Lobgby Screen
IC-4	Participate in city-wide educational and outreach programs	1	1	TDM Coordinator respond and participate in opportunities like bike challenges, rideshare promotions, etc. Probably 1-2 times per year. Could include hosting an on-site event with city staff, like a rideshare sign-up, bikeshare orientation tour, Metrorelated event, etc.

LAND USE AND LOCATION (LU)

S. No.	Measure & Options	Possible	Block 3	City Traffic Feedback / Notes
		Points	Points	,,
LU-1	Affordable housing	1 to 10	0	NA
LU-2	Walk score	1 to 5	4	86 Walk Score for Weston Place across street
LU-3	Add land use mix	2 to 6		
Option A	Two land uses	2 to 4	2	Two uses
Option B	Three land uses	4 to 6	0	NA
LU-4	Provide daycare facilities	2 to 3		
Option A	Off-site facility (within walking distance)	2	0	
Option B	On-site facility	3	0	
LU-5	Provide other specific trip-reducing service	1	0	None assumed
LU-6	Quarter-mile of all-day bus service	3	3	Multiple bus options

PARKING MANAGEMENT (P)

S. No.	Measure & Options	Possible Points	Block 3 Points	City Traffic Feedback / Notes
P-1	Priced parking program	5		
Option A	Cash out for employees	5	0	
Option B	Unbundled for residential	5	5	Uncoupled residential parking
Option C	Charge users a daily minimum amount (all uses)	5	0	
P-2	Shared parking agreement	1 to 2	0	
P-3	Carpool preferential/free parking	1	0	
P-4	Visitor/Student Parking Management	1	0	
0-1	In-Lieu Fee	1 to 37	0	
0-2	Other Innovative Measures	1 to 4	0	

Total Block 2 Mitigation Points

36

Required

25