Potomac Job Corps Center

Exhibit 300: Part I: Summary Information and Justification (All Capital Assets)

I.A. Overview

1. Date of Submission:	8/31/2006
2. Agency:	Department of Labor
3. Bureau:	Job Corps
4. Name of this Capital Asset:	Potomac JCC - Facility Redevelopment
5. Unique Project (Investment) Identifier: (For IT investment only, see section 53. For all other, use agency ID system.)	1550
6. What kind of investment will this be in FY2008? (Please NOTE: Investments moving to O&M ONLY in FY2008, with Planning/Acquisition activities prior to FY2008 should not select O&M. These investments should indicate their current status.)	Full Acquisition / Renovations
7. What was the first budget year this investment was submitted to OMB?	FY2000

8. Provide a brief summary and justification for this investment, including a brief description of how this closes in part or in whole an identified agency performance gap: Scope of Work:

Design and construct a new Cafeteria, Recreation Buildings, two new dormitories (136 beds each), a new vocational complex and the rehabilitation of buildings 2, 12, 13 & 14.

The A/E will deliver the Contract Documents in four phases:

- A) Cafeteria and Recreation Buildings
- B) Renovation of Buildings 2, 12, 13, & 14
- C) Two new Dormitories
- D) Vocational Complex

The contracts for the construction of the Cafeteria and Recreation Building and renovation of buildings 2, 12, 13, & 14 were awarded in PY'2005. The award of the construction contracts for two new dorms is anticipated in PY2006. The award of construction contracts for the vocational complex is anticipated in PY'2007.

DOL Strategic Goals

Four strategic goals guide the Department's mission: A Prepared Workforce; A Secure Workforce; Quality Workplaces; and A Competitive Workforce. These overarching goals guide the Department's day-to-day efforts - and set into motion agency-level goals that provide focus to the Department's programmatic mission. In support of these overarching goals, DOL has identified and set certain strategic, outcome, and performance goals in its strategic plan. (http://www.dol.gov/_sec/stratplan/main.htm)

The performance goals most closely associated with this separately managed DOL real property are:

Strategic Goal 1 - A Prepared Workforce: Enhance Opportunities for America's Workforce
The mission of Job Corps is to attract eligible young adults, teach them the skills they need to become
employable and independent, and place them in meaningful jobs or further education. The new construction of
facilities for Job Corps Training Programs allows the agency to provide training programs which give the youth
served the greatest opportunity to learn skills leading to meaningful employment. New facilities create a
learning environment which enhances educational achievement and the development of vocational and
workplace skills that will lead to increased employment, retention and earnings (A Prepared Workforce).

Outcome Goal 1.2 - Increase opportunities for youth employment. (http://www.dol.gov/_sec/stratplan/strat_plan_2003-2008.htm#outcome1.2)

Performance Goal 1.2B - Improve educational achievements of Job Corps students and increase participation of Job Corps graduates in employment and education.

9. Did the Agency's Executive/Investment Committee approve this request?	Yes					
a. If "yes," what was the date of this approval?	7/31/2006					
10. Did the Project Manager review this Exhibit?	Yes					
11. Contact information of Project Manager?						
Name O'Malley, Mike; RA						
Phone Number						
Email						
	12. Has the agency developed and/or promoted cost effective, energy efficient and environmentally sustainable techniques or practices for this project.					
a. Will this investment include electronic ass	sets (including computers)?	Yes				
b. Is this investment for new construction of building or facility? (answer applicable to non	-	Yes				
1. If "yes," is an ESPC or UESC being used	to help fund this investment?	No				
2. If "yes," will this investment meet susta	ainable design principles?	Yes				
3. If "yes," is it designed to be 30% more energy efficient than relevant code?						
13. Does this investment support one of the P	MA initiatives?	Yes				
If "yes," check all that apply:		Real Property Asset Management				

(FY 2006 - FY2010)

	Baseli					
Performance Measure	ne		Interim	Targets		Goal
	FY	FY	FY	FY	FY	FY
	2005	2006	2007	2008	2009	2010
	\$5.55/	\$5.54/	\$5.53/	\$5.52/	\$5.51/	\$5.50/
Operating Cost*	sf	sf	sf	sf	sf	sf
Condition Index	84%	86%	88%	>90%	>90%	>90%
Utilization Index	88%	>90%	>90%	>90%	>90%	>90%
Mission Dependency						
Index	20%	15%	10%	8%	7%	5%

^{*} The new standard for each year is determined by IFMA based on empirical studies.

13a. Briefly describe how this asset directly supports the identified initiative(s)?

By achieving the Right-cost, Right-size, and Right-condition in this project; Job Corps will meet the objectives of Executive Order 13327. Job Corps has implemented the performance measures set forth in EO 13327 and set the following ambitious performance targets:

14. Does this investment support a program assessed using the Program Assessment Rating Tool (PART)? (For more information about the PART, visit www.whitehouse.gov/omb/part.)	Yes
a. If "yes," does this investment address a weakness found during the PART review?	No
b. If "yes," what is the name of the PART program assessed by OMB's Program Assessment Rating Tool?	Job Corps
c. If "yes," what PART rating did it receive?	Moderately Effective

I.B. Summary of Funding

Sensitive Data

* * * SENSITIVE DATA: The cost information was omitted* * *

Provide the total estimated life-cycle cost for this investment by completing the following table. All amounts represent budget authority in millions, and are rounded to three decimal places. Federal personnel costs should be included only in the row designated "Government FTE Cost," and should be excluded from the amounts shown for "Planning," "Full Acquisition," and "Operation/Maintenance." The total estimated annual cost of the investment is the sum of costs for "Planning," "Full Acquisition," and "Operation/Maintenance." For Federal buildings and facilities, life-cycle costs should include long term energy, environmental, decommissioning, and/or restoration costs. The costs associated with the entire life-cycle of the investment should be included in this report.

Table 1: SUMMARY OF SPENDING FOR PROJECT PHASES (REPORTED IN MILLIONS)

(Estimates for BY+1 and beyond are for planning purposes only and do not represent budget decisions)

				•					
	PY - 1 and Earlier	PY 2006	CY 2007	BY 2008	BY + 1 2009	BY + 2 2010	BY + 3 2011	BY + 4 and Beyond	Total
Planning									
Budgetary Resources									
Outlays									
Budgetary Resources									
Outlays									
Budgetary Resources									
Outlays									
Budgetary Resources									
Outlays									
Budgetary Resources									
Outlays									
Budgetary Resources									
Number of FTE represented by Costs:									

Note: For the cross-agency investments, this table should include all funding (both managing partner and partner agencies). Government FTE Costs should not be included as part of the TOTAL represented.

- 2. Will this project require the agency to hire $$^{\mbox{\scriptsize No}}$$ additional FTE's?
 - a. If "yes," How many and in what year?
- 3. If the summary of spending has changed from the FY2007 President's budget request, briefly explain those changes:
- I.C. Acquisition/Contract Strategy

Sensitive Data

- * * * SENSITIVE DATA: The cost information was omitted* * *
- 1. Complete the table for all (including all non-Federal) contracts and/or task orders currently in place or planned for this investment. Total Value should include all option years for each contract. Contracts and/or task orders completed do not need to be included.

_		Contracts/Task Orders Table:											
	Type of Contract/ Task Order	Has the contract been awarded?	If so what is the date of the award? If not, what is the planned award date?	Start date of Contract/ Task Order	End date of Contract/ Task Order	Acquisition?	Is it performance based?	Competitively awarded?	What, if any, alternative financing option is being used?	Is EVM in the contract?	Does the contract include the required security and privacy clauses?	Name of CO	Contracting Officer Certification Level
	Firm Fixed Price	Yes	6/30/2005	7/19/2005	1/22/2009	No	No	No	None	No	N/A	Marissa DelaCerna	Level 3

2. If earned value is not required or will not be a contract requirement for any of the contracts or task orders above, explain why:

EVM is performed for Job Corps projects by the Engineering Support Contract, which has project management staff responsible for all of the ongoing projects.

3. Do the contracts ensure Section 508 compliance?

N/A

- a. Explain why:
- 4. Is there an acquisition plan which has been Yes approved in accordance with agency requirements?
- a. If "yes," what is the date?

6/07/2000

- b. If "no," will an acquisition plan be developed?
 - 1. If "no," briefly explain why:

I.D. Performance Information

In order to successfully address this area of the exhibit 300, performance goals must be provided for the agency and be linked to the annual performance plan. The investment must discuss the agency's mission and strategic goals, and performance measures must be provided. These goals need to map to the gap in the agency's strategic goals and objectives this investment is designed to fill. They are the internal and external performance benefits this investment is expected to deliver to the agency (e.g., improve efficiency by 60 percent, increase citizen participation by 300 percent a year to achieve an overall citizen participation rate of 75 percent by FY 2xxx, etc.). The goals must be clearly measurable investment outcomes, and if applicable, investment outputs. They do not include the completion date of the module, milestones, or investment, or general goals, such as, significant, better, improved that do not have a quantitative or qualitative measure.

Agencies must use Table 1 below for reporting performance goals and measures for all non-IT investments and for existing IT investments that were initiated prior to FY 2005. The table can be extended to include measures for years beyond FY 2006.

	Performance Information Table 1:								
Fiscal Year	Strategic Goal(s) Supported	Performance Measure	Actual/baseline (from Previous Year)	Planned Performance Metric (Target)	Performance Metric Results (Actual)				
2006	A Prepared Workforce	The percent of Job Corps participants who will enter employment or enroll in post-secondary education or advanced training in the first quarter after exit from the program	79%	87%	TBD				
2006	A Prepared Workforce	The percent of students who will attain GED, high school diploma, or certificate by the end of the third quarter after exit from the program	60%	65%	TBD				
2006	A Prepared Workforce	The percent of students who will achieve literacy and numeracy gains of one adult basic education (ABE) level,	58%	47%	TBD				

		equivalent to two grade levels			
2007	A Prepared Workforce	The percent of Job Corps participants who will enter employment or enroll in post-secondary education or advanced training in the first quarter after exit from the program	87%	87%	TBD
2007	A Prepared Workforce	The percent of students who will attain GED, high school diploma, or certificate by the end of the third quarter after exit from the program	65%	65%	TBD
2007	A Prepared Workforce	The percent of students who will achieve literacy and numeracy gains of one adult basic education (ABE) level, equivalent to two grade levels	47%	49%	TBD
2008	A Prepared Workforce	The percent of Job Corps participants who will enter employment or enroll in post-secondary education or advanced training in the first quarter after exit from the program	87%	87%	TBD
2008	A Prepared Workforce	The percent of students who will attain GED, high school diploma, or certificate by the end of the third quarter after exit from the program	65%	66%	TBD
2008	A Prepared Workforce	The percent of students who will achieve literacy and numeracy gains of one adult basic education (ABE) level, equivalent to two grade levels	49%	55%	TBD

Exhibit 300: Part II: Planning, Acquisition and Performance Information

II.A. Alternatives Analysis

Sensitive Data

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Part II should be completed only for investments identified as "Planning" or "Full Acquisition," or "Mixed Life-Cycle" investments in response to Question 6 in Part I, Section A above.

In selecting the best capital asset, you should identify and consider at least three viable alternatives, in addition to the current baseline, i.e., the status quo. Use OMB Circular A- 94 for all investments, and the Clinger Cohen Act of 1996 for IT investments, to determine the criteria you should use in your Benefit/Cost Analysis.

1. Did you conduct an alternatives analysis for this project?

Yes

a. If "yes," provide the date the analysis was completed?

8/1/2006

b. If "no," what is the anticipated date this analysis will be completed?

c. If no analysis is planned, please briefly explain why:

2. Alternative Analysis Results:

Use the results of your alternatives analysis to complete the following table:

Send to OMB	Alternative Analyzed	Description of Alternative	Risk Adjusted Lifecycle Costs estimate	Risk Adjusted Lifecycle Benefits estimate
False	Alternative 1	Baseline - Status Quo – Maintain operations of substandard buildings. This is not a feasible option because the existing facilities have deteriorated to a point that they can no longer function properly.	N/A	N/A
True	Alternative 2	Construct new prototype facilities 1. The prototype dormitories will afford the students the much needed privacy. 2. The lounges and study rooms will allow extended after class training fro the students. 3. The old vocational shops will be consolidated into one prototype vocational complex. 4. No temporary housing or other facilities will be required during construction 5. The historic cottages will be renovated. The historic cottages will provide dormitory swing space during construction and will become the permanent "independent living" dormitory.		
False	Alternative 3	Modify/Rehab existing buildings 1. The existing space and configuration will not be sufficient for Job Corps operation. 2. Privacy in dormitories will still be somewhat lacking. 3. The remaining useful life for the existing buildings is questionable. 4. Construction phasing will present substantial disruption to the center operation. 5. The resultant space will remain inefficient for Job Corps operation. 6. Requires temporary facilities for housing, food service, and vocational buildings		
False	Alternative 4	Relocate This alternative was studied for quite some time but found not feasible because: 1. An extended search on GSA excess properties and other privately held properties did not yield anything suitable to Job Corps needs from a programmatic viewpoint. 2. Even if there is suitable property, the purchase cost would have been prohibitive. 3. This is not a viable solution. No life cycle cost analysis was performed on this alternative.		

3. Which alternative was selected by the Agency's Executive/Investment Committee and why was it chosen?

Background:

- 1. The existing facilities (cafeteria, recreation, vocational shops and dormitories) are deteriorating at an alarming pace.
- 2. The existing facilities do not have adequate space and present substantial challenge in complying with building codes.
- The configuration of the existing space is not conducive to Job Corps operation.
- 4. The existing dormitories are overcrowded and offer the student very little privacy.
- 5. The existing recreational spaces are scattered over several buildings and difficult to manage.
- 6. If the current condition persists, some parts of these facilities will have to be shut down and student enrollment will certainly drop.

Alternative 2 was chosen.

- 1. Even though alternative 1 has the lowest life cycle cost, this option will leave the historic cottages in a dilapidated & uninhabitable condition.
- 2. Alternative 3 is only slightly higher in cost but makes good use of the historic cottages.

Build New Dorms, Alternative 2, was selected as determined by the long range plan, which is based on the following assumptions:

Assumptions:

- 1. The life cycle cost analysis is based on a 30 yr. span.
- 2. Cost of new construction or rehabilitation is based on Job Corps historic data or R.S. Means cost publication.
- 3. Cost of repairs, utilities and maintenance is based on BOMA data.
- 4. Even after rehab, the repaired building will not perform like a new building. Some building elements will need replacement.
- 5. A rehabilitated building will be treated as the same as a ten year old building.
- 6. At the end of the 15th year, some building systems will require replacement, such as HVAC system, roofing, etc...
- 7. Discount rate in calculating the cost/benefit analysis is based on OMB guidelines (3%).
- 8. Rate of depreciation is based on IRS guidelines (39 yrs for non-residential bldgs).
- 9. Rate of investment return is based on a study by a Job Corps consultant, the Mathematica.
- 10. Costs are in constant dollar.

II.B. Risk Management

You should have performed a risk assessment during the early planning and initial concept phase of this investment's life-cycle, developed a risk-adjusted life-cycle cost estimate and a plan to eliminate, mitigate or manage risk, and be actively managing risk throughout the investment's life-cycle.

1. Does the investment have a Risk Management Plan?	Yes
a. If "yes," what is the date of the plan?	8/1/2006
b. Has the Risk Management Plan been significantly changed since last year's submission to OMB?	No
c. If "yes," describe any significant changes:	

2. If there currently is no plan, will a plan be developed?

a. it "yes,"	what is the planned comple	etion
date?		

b. If "no," what is the strategy for managing the risks?

3. Briefly describe how investment risks are reflected in the life cycle cost estimate and investment schedule:

Date I dentifie d	Area of Risk	Description	Probability of Occurrence	Strategy for Mitigation	Current Status as of the date of this exhibit
8/8/2006	1 - Schedule	Overly aggressive deliverable dates	Basic	Ensure the resources exist to support aggressive schedule and obtain senior management approval	Constructio n in Progress
8/8/2006	1 - Schedule	Overly aggressive deliverable dates	Basic	Break project up into discrete useful segments, brief in duration and narrow in scope	Constructio n in Progress
8/8/2006	1 - Schedule	Project delays due to labor issues	Basic	Monitor local labor condition.	Constructio n in Progress
8/8/2006	1 - Schedule	Time extensions required due to weather	High	Plan construction start carefully and close monitoring of CPM schedule	Constructio n in Progress
8/8/2006	1 - Schedule	Permitting process delay construction start	Medium	Coordinate with local authority early in the process.	Constructio n in Progress
8/8/2006	1 - Schedule	Inability to track actual progress against planned milestones	Medium	Structure contract to require frequent contractor reporting based on approved milestones. (CPM schedule, etc)	Constructio n in Progress
8/8/2006	2 - Initial Costs	Overly conservative or optimistic initial cost estimate	Medium	Use generally accepted cost estimation techniques	Constructio n in Progress
8/8/2006	2 - Initial Costs	Overly conservative or optimistic initial cost estimate	Medium	Use historic cost data, provide contingency	Constructio n in Progress
8/8/2006	2 - Initial Costs	Inadequate information upon which to accurately estimate costs (scope and requirements)	Medium	Conduct scope verification prior to budget request and Perform peer review of scope to ensure completeness	Constructio n in Progress
8/8/2006	2 - Initial Costs	Inadequate information upon which to accurately estimate costs (scope and requirements)	Medium	Conduct scope verification prior to budget request	Constructio n in Progress
8/8/2006	2 - Initial Costs	Inadequate information upon which to accurately estimate costs (scope and requirements)	Medium	Perform peer review of scope to ensure completeness	Constructio n in Progress
8/8/2006	2 - Initial	Mis-estimation of	Medium	Management plan incorporates human	Constructio

	Costs	scope		resource needs/estimates of government staff level of effort	n in Progress	
8/8/2006	2 - Initial Costs	Mis-estimation of scope	Medium	Provide contingency	Constructio n in Progress	
8/8/2006	2 - Initial Costs	Mis-estimation of scope	Medium	Conduct peer review of the scope	Constructio n in Progress	
8/8/2006	Costs	Inaccurate or wrong assumptions	Basic	Use generally accepted cost estimation techniques to ensure all associated costs are captured	Constructio n in Progress	
8/8/2006	Costs	Inaccurate or wrong assumptions	Basic	Use industry standards for estimating recurring costs	Constructio n in Progress	
8/8/2006		Incomplete, inappropriate parameters	Medium	Use best practices and knowledge of similar projects, as well as industry research and accepted cost estimating techniques to ensure accuracy	Constructio n in Progress	
8/8/2006	Obsolescence	Investment may not adapt to future needs of the Center (e.g. changing needs of the vocational training facilities)	Medium	Ensure system design is flexible enough to accommodate program changes	Constructio n in Progress	
8/8/2006	Obsolescence	In-house capability may be insufficient to cover all aspects of investment	Medium	Ensure troubleshooting and support issues can be handled in-house as required	Constructio n in Progress	
8/8/2006	Obsolescence	Investment may require upgrades to comply with new regulations (e.g. asbestos abatement; radon mitigation system)	Medium	Periodic facility evaluation to ensure compliance and project medical needs.	Constructio n in Progress	
8/8/2006	,	Unrealistic performance and technical specifications	Medium	Obtain independent assessment of performance and technical specifications; Ensure senior management approval of performance and technical specifications	Constructio n in Progress	
8/8/2006		Unrealistic performance and technical specifications	Medium	Review similar projects completed in the past, projects in other Agencies or the private sector to ensure the expected performance is achievable	Constructio n in Progress	
8/8/2006	5 - Feasibility	Unrealistic performance and technical specifications	Medium	Requirements definition work and planning largely complete prior to beginning of implementation/integration	Constructio n in Progress	
8/8/2006	6 - Reliability of Systems	Systems within investment do not last expected lifespan	Medium	Clarify warranty and guaranty issues in design documents	Constructio n in Progress	
8/8/2006	7 -	Many dependencies	Basic	Identify and plan for dependencies up front; Develop contingency plans for potential failure or delay of any dependent systems or processes	Constructio n in Progress	
8/8/2006		Impact of loss, damage or the	Basic	Ensure that physical and environmental security measures (protection of the asset)	Constructio n in	

	Protection) Considerations	adequacy of physical protection of the asset		are commensurate with the value of the asset and the level of risk		
8/8/2006	10 - Capability of Agency to Manage the Investment	Lack of experience to manage a project of similar size and scope	Medium	Ensure the investment project is led by experienced project manager	Constructio n in Progress	
8/8/2006	11 - Overall Risk of Project Failure	Risk assessment results in one or more factors, whose occurrence would have catastrophic consequences for the project	Medium	Ensure risk is assessed up front and actively managed throughout the life of the project; Request regular risk management reports from the contractor; Ensure management/mitigation plans will adequately address the occurrence of risk	Constructio n in Progress	
8/8/2006	11 - Overall Risk of Project Failure	Inadequate attention is paid to monitoring cost, schedule, and performance goals	High	Provide monthly reports to senior management on cost, schedule, and performance	Constructio n in Progress	
8/8/2006	11 - Overall Risk of Project Failure	Lack of senior management attention	Medium	Obtain senior management signoff on a formal risk management plan	Constructio n in Progress	
8/8/2006	12 - Organizational and Change Management	Risk of disruption to mission resulting from project	Medium		Constructio n in Progress	
8/8/2006	12 - Organizational and Change Management	Absence of formal coordination body/team/entity to manage transition	Medium	Project management plan updated regularly including transition management team/board	Constructio n in Progress	
8/8/2006	16 - Strategic	Project is ongoing or stop- gap investment not fully aligned with more recent agency strategic plan	Basic	Formal communication channel with agency leadership/central CIO shop established to inform leadership and acquire sponsor	Constructio n in Progress	
8/8/2006	17 - Security	Risk associated with construction projects	Basic	Ensure adequate security mechanisms; Consider outsourcing to alleviate surety considerations	Constructio n in Progress	
8/8/2006	19 - Project Resources	Insufficient acquisition expertise or acquisition planning resources	Basic	Members with acquisition management/planning expertise and financial management expertise included in Integrated Project Team (IPT)	Constructio n in Progress	
8/8/2006	19 - Project Resources	Insufficient acquisition expertise or acquisition planning resources	Basic	Project broken into discrete useful segments, brief in duration and narrow in scope	Constructio n in Progress	
8/8/2006	19 - Project Resources	Cost Overruns	High	Monitor contractor performance; Custom design portions of the project isolated and limited; Project plan updated regularly	Constructio n in Progress	

II.C. Cost and Schedule Performance

Sensitive Data

* * * SENSITIVE DATA: The cost information was omitted* * *

1. Does the earned value management system Yes meet the criteria in ANSI/EIA Standard-748?

2. Answer the following questions about current cumulative cost and schedule performance. The numbers reported below should reflect current actual information. (Per OMB requirements Cost/Schedule Performance information should include both Government and Contractor Costs):

a. What is the Planned Value (PV)?

b. What is the Earned Value (EV)?

c. What is the actual cost of work performed (AC)?

d. What costs are included in the reported
Cost/Schedule Performance information
(Government Only/Contractor Only/Both)?

Contractor Only

e. "As of" date:

3. What is the calculated Schedule Performance Index (SPI = EV/PV)?

0.9304123

8/1/2006

4. What is the schedule variance (SV = EV-PV)?

- 1.350000

5. What is the calculated Cost Performance Index (CPI = EV/AC)?

1.057767899

6. What is the cost variance (CV=EV-AC)?

0.985765

7. Is the CV% or SV% greater than +/- 10%? (CV%= CV/EV x 100; SV%= SV/PV x 100)

? No

a. If "yes," was it the?

b. If "yes," explain the variance:

c. If "yes," what corrective actions are being taken?

d. What is most current "Estimate at Completion"?

8. Have any significant changes been made to the baseline during the past fiscal year?

8a. If "yes," when was it approved by OMB?

No

Comparison of Initial Baseline and Current Approved Baseline

Milestone Number	Description of Milestone	Initial Baseline		Current Baseline				Current Baseline Variance		Percent
		Planned Completion Date	Total Cost (Estimated)	Completion Date		Total Cost		Schedule (# days)	Cost	Complete
				Planned	Actual	Planned	Actual	(# days)		
1	Design	1/1/04		1/1/04				935		100%
2	Construction Administration	9/15/10		9/15/10				2449		40%
3	Columbia Enterprise Building 2 – 2002	12/17/02		12/17/02				200		100%
4	Columbia Enterprise Building 2 – 2003	4/23/04		4/23/04				231		100%
5	Columbia Enterprise Building 2 - Roof	8/5/05		8/5/05				242		100%
6	Cafeteria/Rec Center	11/20/06		11/20/06				883		91%
7	Federal Cottages	2/6/07		2/6/07				568		66%
8	Dormitories	6/12/08		6/12/08			TBD	505		
9	Voc Buildings	9/15/10		9/15/10			TBD	442		
Project							TBD			44%