APPENDIX L

PUBLIC COMMENT LETTERS ON THE RECIRCULATED DRAFT PEIR

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Comment Letter A1

DEPARTMENT OF TRANSPORTATION
DISTRICT 6 OFFICE
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FRESNO, CA 93778-2616
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Making Conservation a California Way of Life

May 4, 2021

Program Environmental Impact Report
City of Fresno General Plan
Amendment No. P19-04226

SENT VIA EMAIL

Sophia Pagoulatos, Planning Manager
Development and Resource Management
2600 Fresno Street, Room 3065
Fresno, CA 93721

Dear Mx. Pagoulatos:

Thank you for the opportunity to review the Draft Program Environmental Impact Report (PEIR) for the City of Fresno General Plan Amendment no. p19-04226. The City of Fresno (City) has prepared the recirculated Draft PEIR to analyze environmental impacts associated with implementation of the proposed project based on new information made available after its original circulation, but before certification, in 2020. The project location is the Planning Area of the City of Fresno. The Planning Area is generally bounded by the San Joaquin River to the north, American Avenue to the south, Garfield Avenue to the west, and McCall Avenue to the east. **A1-1**

Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

1. Caltrans believes a traffic safety impact analysis should be performed during the California Environmental Quality Act (CEQA) development review process. Therefore, please include Caltrans in the scope of work for the traffic analysis. **A1-2**

2. Any safety impacts to any State facilities should be included in the local regions traffic impact fee program. **A1-3**

3. Page 78 of the PDF document: **3.2.1.1 General Plan Elements**- *Mobility and Transportation Element*. "This element addresses the multi-modal transportation needs throughout the Planning Area including all users of streets and highways, transit, sidewalks and trails, and bicycle transportation modes". **A1-4**

4. Caltrans concurs with the above statement to address multi-modal transportation needs for a growing population. **A1-4 cont.**

5. Page 78 of the PDF document: **3.2.1.1 General Plan Elements** *–Parks, Open Space, and Schools Element*. "This element provides guidance for green spaces and community facilities in the Planning Area such as parks, recreation, open space, biological resources, and schools. The project evaluated in this PEIR does not include any revisions to this element".

6. If not done so already, the General Plan might consider including recommendations to implement Safe Routes to School strategies where feasible for safer modes of active transportation. **A1-5**

7. Page 292 of the PDF document: Policy MT-2-c: **Reduce VMT through Infill Development**. "Provide incentives for infill development that would provide jobs and services closer to housing and multi-modal transportation corridors in order to reduce citywide vehicle miles travelled (VMT)".

8. For high density areas, Caltrans recommends the Lead Agency conduct a study to determine if a bike-share kiosk is feasible. This can provide commuter options for those who do not own an automobile or for those who prefer alternative transportation. **A1-6**

9. Active Transportation Plans (ATP) and Smart Growth efforts support the State's 2050 Climate goals. Caltrans supports reducing Vehicle Miles Traveled (VMT) and GHG emissions in ways that increase the likelihood people will benefit from a multimodal transportation network. **A1-7**

If you have any other questions, please call or email Edgar Hernandez at (559) 981-7436 or at Edgar.Hernandez@dot.ca.gov. **A1-8**

Sincerely,

David Padilla, Branch Chief
Transportation Planning – North

Comment Letter A2

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 10, 2021

Sophia Pagoulatos
City of Fresno
2600 Fresno St, Room 3065
Fresno, California 93721

Subject: City of Fresno General Plan (Project)
Program Environmental Impact Report (PEIR) (Recirculated)
SCH#: 2019050005

Dear Ms. Pagoulatos:

The California Department of Fish and Wildlife (CDFW) received a PEIR from the City of Fresno for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id*., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

A2-1

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

A2-1 cont.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Fresno

Objective: The City of Fresno is updating the existing General Plan Master EIR (MEIR) and converting it to a Program EIR (PEIR) to be in conformance with State law and consistent with recent legislative changes related to Vehicle Miles Traveled (VMT). The PEIR includes a current baseline for the continued implementation of the approved General Plan and reflects changes in City planning documents that have occurred since adoption of the approved General Plan in 2014. The City is not proposing any land use changes as a part of this project, but it does include an update to the City's Greenhouse Gas Reduction Plan. This update, consistent with Section 15168 of the CEQA Guidelines, is intended to streamline implementation of the General Plan's programs and projects by supporting them with updated environmental analysis, regulatory framework, and mitigation measures, pursuant to CEQA. The Draft PEIR is being recirculated to address a new significant impact related to VMT which includes air quality, greenhouse gas emissions, and transportation. All other information, including Biological Resources, remains the same as the March 2020 PEIR.

A2-2

Location: The Project site (General Plan Planning Area) encompasses approximately 106,000 acres and includes all areas within the City's limits and current sphere of influence.

The majority (approximately 63 percent) of the Project site/Planning Area consists of previously disturbed urban/developed areas containing industrial, commercial, and residential development and associated roads and infrastructure. Approximately 32 percent of this area contains previously disturbed agricultural lands, orchards, pasture, and row and field crops located predominately along the outer boundaries of the Planning Area. Undeveloped and undisturbed areas with native vegetation occur within the remaining 5 percent of the Planning Area.

Timeframe: The proposed project would be implemented over a 15-year period, through the horizon year of 2035 and beyond since the complete build out of the General Plan would not likely occur until after 2056.

COMMENTS AND RECOMMENDATIONS

After reviewing the 2021 recirculated PEIR document, CDFW has the same comments as previously listed in our comment letter dated April 20, 2020 for the City's previous version of PEIR written in 2020 (See Attachment 1).

A2-3

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CDFW remains concerned regarding potential impacts to special-status species including, but not limited to, the State and federally endangered Fresno kangaroo rat (*Dipodomys nitratoides exilis*), San Joaquin kit fox (*Vulpes macrotis mutica*), and least Bell's vireo (*Vireo bellii pusillus*); the State endangered and federally threatened western yellow-billed cuckoo (*Coccyzus americanus occidentalis*); the federally endangered valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*); the federally threatened vernal pool fairy shrimp (*Branchinecta lynchi*); the State and federally threatened California tiger salamander (*Ambystoma californiense*); the State threatened Swainson's hawk (*Buteo swainsoni*) and tricolored blackbird (*Agelauis tricolor*); the State species of special concern burrowing owl (*Athene cunicularia*), western spadefoot (*Spea hammondii*), western pond turtle (*Emys* marmorata), American badger (*Taxidea taxus*), Chinook salmon (*Oncorhynchus tshawytscha*), pallid bat (*Antrozous pallidus),* and spotted bat (*Euderma maculatum*); the State rare California Satintail (*Imperata brevifolia*), and other special-status plants.

A2-3 cont.

We acknowledge that it is unlikely that any individual Project site would require all the recommended mitigation measures to reduce impacts to less than significant, and it's likely that some or most of the disturbed urban/developed areas would not require any of the recommended mitigation measures to reduce impacts to less than significant. However, special status species may occur in previously disturbed agricultural lands, orchards, pasture, and row and field crops as well as the undisturbed areas occurring within the Project area. Based on the information provided in the recirculated PEIR, CDFW cannot determine the extent of impacts that are likely to occur to fish and wildlife resources, or what mitigation measures may be necessary to reduce impacts to less than significant and/or avoid unauthorized take of species listed pursuant to CESA.

CDFW appreciates the opportunity to comment on the Project to assist the City of Fresno in identifying and mitigating the Project's impacts on biological resources. We are happy to meet with you to discuss the Project, our recommended mitigation measures, and/or consider alternative measures. If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at Kelley.Nelson@wildlife.ca.gov.

A2-4

Sincerely,

DocuSigned by:
Annee Ferranti
041A77B10D78486...

for Julie A. Vance
Regional Manager

Attachment 1

ec: Patricia Cole
United States Fish and Wildlife Service
Patricia.Cole@fws.gov

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Comment Letter B1

2907 S. MAPLE AVENUE
FRESNO, CALIFORNIA 93725-2208
TELEPHONE: (559) 233-7161
FAX: (559) 233-8227

A Century of Commitment, Conveyance & Customer Service

May 5, 2020

Sophia Pagoulatos, Planning Manager
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

RE: City of Fresno's General Plan Draft Program Environmental Impact Report (PEIR)
FID Facilities: Various

Dear Ms. Pagoulatos:

The Fresno Irrigation District (FID) has reviewed the Draft Program Environmental Impact Report (PEIR) for the City of Fresno. The project location is the Planning Area of the City of Fresno. To be in conformance with State law and consistent with recent legislative changes, the City is updating the 2014 adopted Fresno General Plan and certified Master Environmental Impact Report (MEIR). This update is to provide consistency with Section 15168 of the CEQA Guidelines. We appreciate the opportunity to review and comment on the subject documents for the proposed Plan. The proposed Plan is a significant development and requires thorough and careful consideration of all the potential impacts. Our comments are as follows: **B1-1**

1. FID previously reviewed and commented on the subject project on May 29, 2019 as Notice of Preparation of a Program Environmental Impact Report, an Update to the Master Environmental Impact Report for the City of Fresno General Plan. A copy of FID's previous comments have been attached for your reference. The comments and conditions still apply. It also appears that there may still be a water deficit within the project area by 2040. These impacts must be mitigated or considered as part of the your determination. **B1-2**

BOARD OF DIRECTORS President RYAN JACOBSEN, Vice-President JERRY PRIETO, JR.
CHRISTOPHER WOOLF, GEORGE PORTER, GREGORY BEBERIAN, General Manager BILL STRETCH

Comment Letter B1 cont.

Thank you for making available to us the City of Fresno's Draft Plan Environmental Impact Report for our review and allowing us the opportunity to provide comments. We appreciate the opportunity to review and comment on the subject documents for this project. While it is difficult to envision all of the potential impacts without all of the improvement details, we attempted to provide you as much information as possible. We reserve the right to provide additional comments when more detailed information becomes available. If you have any questions, please feel free to contact me at (559) 233-7161 extension 7103 or LKimura@fresnoirrigation.com.

B1-3

Sincerely,

Laurence Kimura, P.E.
Chief Engineer

Attachments

Comment Letter B2

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

May 06, 2021

Sophia Pagoulatos
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Project: Recirculated Program Environmental Impact Report for the City of Fresno General Plan Amendment No. P19-04226

District CEQA Reference No: 20210311

Dear Ms. Pagoulatos:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Recirculated Draft Program Environmental Impact Report (DPEIR) for the project referenced above from the City of Fresno (City). The project consists only of text changes to the Mobility and Transportation Element related to Vehicle Miles Traveled (VMT) analysis, and an update to the Greenhouse Gas Reduction Plan from the prior DPEIR (Project). The text changes for Mobility and Transportation Element related to Vehicle Miles Traveled and Greenhouse Gas Plan Update sections include adding the City of Fresno's adopted VMT thresholds and guidelines that were adopted after the last DPEIR was circulated to the public. Additionally, the thresholds and guidelines adopted by the City include screening methods for VMT threshold, and VMT significance thresholds for development projects, transportation projects, and plans. The Project is located within the Planning Area, shown in Figure 1, which is bounded by the San Joaquin River to the north, American Avenue to south, Garfield Avenue and McCall Avenue to the east, with the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF) generally located with Jensen Avenue to the north, American Avenue to the south, South Chateau Fresno Avenue to the west, and Cornelia Avenue to the east. This Project also lies within one of the fifteen communities in the State selected by the California Air Resources Board (CARB) for investment of additional air quality resources and attention under Assembly Bill (AB) 617 (2017, Garcia) in an effort to reduce air pollution exposure in impacted disadvantaged communities.

B2-1

Samir Sheikh
Executive Director/Air Pollution Control Officer

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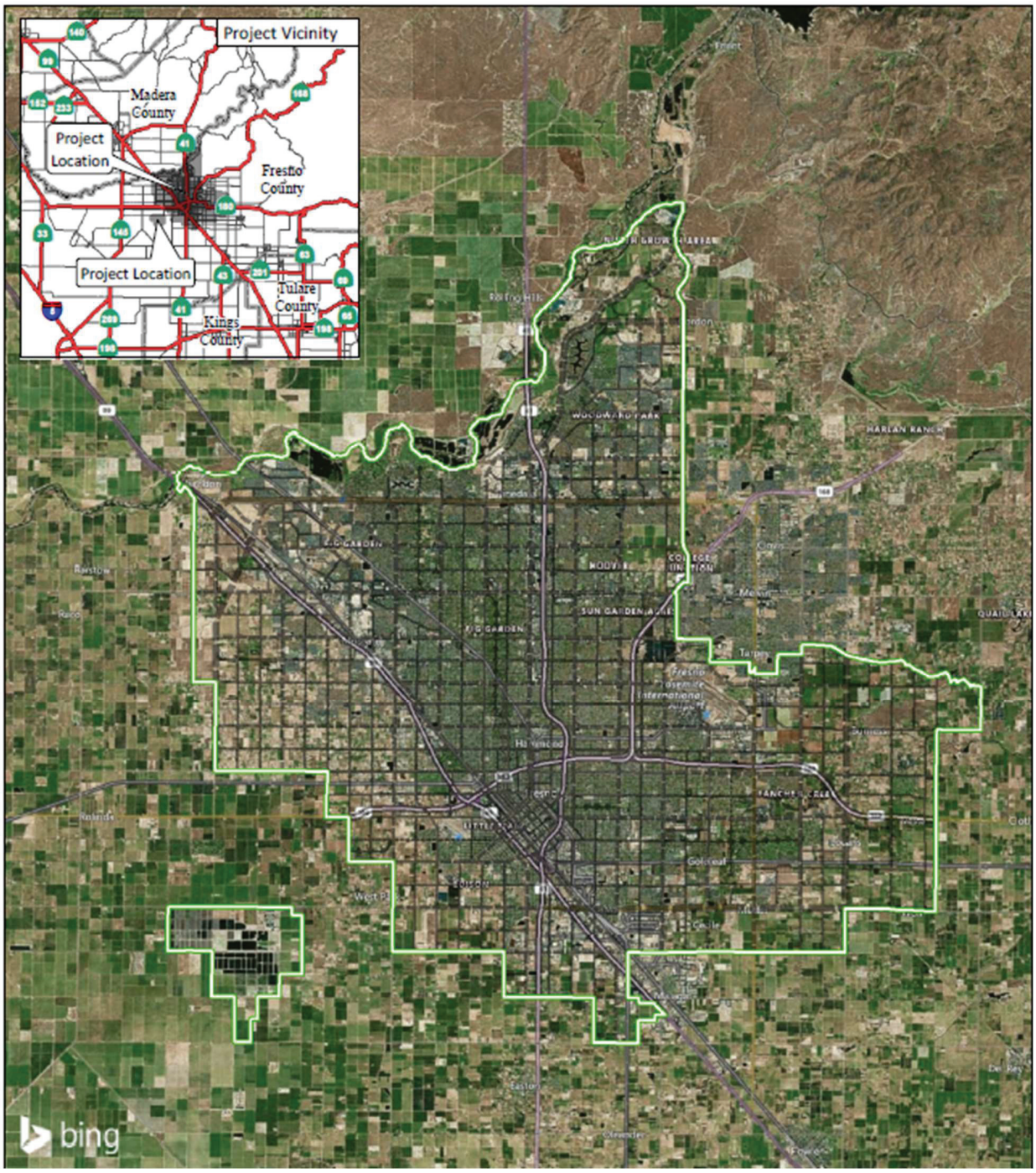
Comment Letter B2 cont.

Figure 1: Boundaries of the City of Fresno General Plan Amendment



Comment Letter B2 cont.

B2-1 cont.

The District offers the following comments:

1) Ongoing Commitment to Strengthen Working Relationship

The District appreciates the City's ongoing commitment to strengthen the working relationship with the District, and commits to supporting the City in identifying and mitigating impacts on air quality through the CEQA review process.

Consistent with this cooperative effort and in order to address air quality impacts and concerns prior to future development projects occurring, the District recommends that the City develop administrative mechanisms and policies that ensure consistency in providing the District with information about projects under consideration by the City, such as land use designation, project size, and proximity to sensitive receptors and existing emission sources. To aid the City in determining a project's potential impacts, the District recommends the City provide an assessment evaluating potential project construction and operation related to air quality impacts to the District as early as possible. Additionally, the District is available to work with the City and project applicants on future development projects to address air quality impacts and concerns. The District encourages the City to include in the General Plan a section that advises project applicants to reach out and work with the District. The District's goal is to assist with enhancing project designs in the early stages of the planning process for a better overall project with minimized impact on air quality and early identification of feasible mitigation measures.

B2-2

2) Project Siting

The General Plan is the blueprint for future growth and provides guidance for the community's development. The Project itself will not have an impact on air quality. However, without appropriate mitigation, future development projects within the City may contribute to negative impacts on air quality due to increased traffic and ongoing operational emissions. The General Plan sets the planning guidelines for where future developments can be sited and includes the City's comprehensive community goals, policies, and objectives. Appropriate project siting helps ensure there is adequate distance between conflicting land uses, to prevent or reduce both localized and cumulative air pollution impacts from commercial and industrial land uses that are in close proximity to schools or residential areas. Possible planning resources that may be included in the General Plan that are available to the City and future developers include:

B2-3

- California Air Board Resources' (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*. The document includes tables with recommended buffer distances associated with various types of common sources (e.g. distribution centers, chrome platers, gasoline dispensing facilities, etc.), and can be found at: https://ww3.arb.ca.gov/ch/handbook.pdf

- *CARB Freight Handbook Concept Paper*. This document will compile the best practices designed to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities. CARB and the District are committed to work cooperatively to advance implementation of the best practices discussed in Tables 5 and 6 of the Freight Handbook Concept Paper. CARB Freight Handbook Concept Paper documents can be found at: https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf

B2-3 cont.

3) Reducing Vehicle Miles Traveled

The District is currently designated as extreme non-attainment of the federal national ambient air quality standard for ozone and non-attainment for PM2.5. Mobile source emissions resulting from growth and development could have significant impacts on air quality. To reduce the project related impacts on air quality, the General Plan should include language supported by policy establishing standards designed to reduce vehicle miles traveled (VMT). The General Plan VMT can be reduced through encouragement of mixed-use development, walkable communities, and other project design elements.

To aid agencies in addressing VMT impacts the District has prepared the following guidance documents: *Air Quality Guidelines for General Plans*, and *AB 170 Requirements for General Plans*. These documents provide general information and recommendations for policies that are effective in reducing impacts from growth and development projects. The District appreciates the City for its effort in integrating recommendations identified in the *Air Quality Guidelines for General Plans* document into the proposed General Plan.

B2-4

These documents are available on the District's website at: http://www.valleyair.org/transportation/Guidelines_for_General_Plans.htm.

Additionally, recommended design elements can be found on the District's website at: http://www.valleyair.org/transportation/Mitigation-Measures.pdf.

4) Assembly Bill 617

Assembly Bill 617 requires CARB and air districts to develop and implement Community Emission Reduction Programs (CERPs) in an effort to reduce air pollution exposure in impacted disadvantaged communities, like those in which the Project is located. The South Central Fresno AB 617 community is one of the three Valley communities selected by CARB for investment of additional air quality resources and attention under AB 617.

B2-5

The CERP for South Central Fresno was developed through an extensive community engagement process, which included input from members of a Community Steering

Committee. The South Central Fresno CERP was adopted by the District's Governing Board in September 2019 and by CARB in February 2020. The CERP identifies a wide range of measures designed to reduce air pollution and exposure, including a number of strategies to be implemented in partnership between agencies and local organizations. The Community Steering Committee has developed, through a collaborative process, a series of emission reduction strategies with the goal to improve community health by reducing exposure to air pollutants. Such emission reduction strategies include, but are not limited to, enhanced community participation in land use processes, the deployment of zero and near-zero emission Heavy Heavy-Duty (HHD) trucks, HHD truck rerouting analyses, reducing HHD truck idling, and incorporating vegetative barriers and urban greening. In addition, one of the measures identified and prioritized in the CERP includes working collaboratively with the City to enhance community participation in land use processes, including working together to ensure more comprehensive opportunities for public input on land use decisions, and better communicating and understanding air quality impacts and potential mitigation.

B2-5 cont.

Recognizing that a large portion of the City consists of the South Central Fresno AB 617 community, the District encourages the City to further assess the emission reductions measures and strategies contained in the CERP, and address them in the Fresno General Plan, as appropriate.

For more details about the South Central Fresno CERP, please visit the District website at:
http://community.valleyair.org/media/1516/01finalscfresnocerp-9-19-19.pdf.

5) Recommendations for Future Individual Development Projects

The following recommendations should be considered for inclusion in the PEIR to address impacts resulting from future development projects on air quality:

B2-6

5a) Construction Related Emissions

Mitigation Measure (MM) Air-2.1 in the Draft PEIR states,

"*Prior to future discretionary project approval, development project applicants shall prepare and submit to the Director of the City Planning and Development Department, or designee, a technical assessment evaluating potential project construction phase-related air quality impacts. The evaluation shall be prepared in conformance with SJVAPCD methodology for assessing construction impacts. If construction related air pollutants are determined to have the potential to exceed the SJVAPCD adopted threshold of significance, the Planning and Development Department shall require that applicants for new development projects incorporate mitigation measures into construction plans to reduce air pollutant emissions during construction activities*."

B2-7

Per the Draft PEIR, if construction emissions for specific future development projects would result in a significant impact on air quality, the new development project will be required to incorporate mitigation measures, such as the use of diesel oxidation catalysts and/or catalyzed diesel particulate traps on diesel equipment, into their construction plans.

Nonetheless, to further reduce impacts from construction-related exhaust emissions and activities, the District recommends the proposed mitigation measure Air-2.1 be modified to include the following additional potential mitigation measures:

B2-7 cont.

- Requiring all future development projects with construction-related exhaust emissions and activities resulting in significant impacts on air quality to utilize the cleanest reasonably available off-road construction fleets and practices (i.e. eliminating unnecessary idling), and

- Advising all future development projects with construction-related exhaust emissions and activities resulting in a less than significant impact on air quality to utilize the cleanest reasonably available off-road construction fleets and practices (i.e. eliminating unnecessary idling).

5b) <u>Operational Related Emissions – Heavy-Duty Trucks and Other Heavy-Duty Equipment</u>

Mitigation Measure (MM) Air-2.2 in the Draft PEIR states:

> *"Prior to future discretionary project approval, development project applicants shall prepare and submit to the Director of the City Planning and Development Department, or designee, a technical assessment evaluating potential project operation-related air quality impacts. The evaluation shall be prepared in conformance with SJVAPCD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SJVAPCD-adopted thresholds of significance, the Planning and Development Department shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities."*

B2-8

Per the Draft PEIR, new development projects that result in significant impact on air quality for operational emissions are required to incorporate clean air project design elements aimed at reducing project impact on air quality to less than significant when feasible.

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from Heavy Heavy-Duty (HHD) Trucks, the single largest source of NOx emissions in the San Joaquin Valley. The District recently adopted the *2018 PM2.5 Plan* for meeting federal

PM2.5 standards in the San Joaquin Valley, and which relies on significant new emissions reductions from HHD Trucks. These reductions include those achieved through the implementation of the California Air Resources Board (CARB) Statewide Truck and Bus Regulation, which requires truck fleets operating in California to meet the 2010 0.2 g/bhp-hr NOx standard by 2023. Additionally, to meet the federal air quality standards by the 2020 to 2024 attainment deadlines, the Plan relies on a significant and immediate transition of heavy-duty truck fleets to zero or near-zero emissions technologies, including the near-zero truck standard of 0.02 g/bhp-hr NOx established by the California Air Resources Board.

Nonetheless, to further reduce impacts from future development projects with related operational emissions and activities that result in significant impacts on air quality, the District recommends the following proposed mitigation measures be included in the General Plan:

- Requiring operational fleets to utilize the cleanest available HHD truck technologies, including zero and near-zero (0.02 g/bhp-hr NOx) technologies as feasible,

- Requiring all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) from development projects (such as distribution centers, warehouse, etc.) to utilize zero-emissions technologies as feasible, and

- Requiring fleets associated with future development projects to implement best practices (i.e. eliminating unnecessary idling).

Furthermore, for future development projects with operational emissions and activities that result in a less than significant impact on air quality, the District recommends the following proposed measures be included in the General Plan:

- Advising operational fleets to utilize the cleanest available HHD truck technologies, including zero and near-zero (0.02 g/bhp-hr NOx) technologies as feasible,

- Advising all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) from development projects (such as distribution centers, warehouse, etc.) to utilize zero-emissions technologies as feasible, and

- Advising fleets associated with future development projects to implement best practices (i.e. eliminating unnecessary idling).

B2-8 cont.

5c) Operational Related Emissions - Truck Routing

Truck routing involves the path/roads heavy-duty trucks take to and from their destination. The air emissions from heavy-duty trucks can impact residential communities and sensitive receptors.

The District recommends the General Plan include guidance supported by policy requiring future development projects to evaluate heavy-duty truck routing patterns to help limit emission exposure to residential communities and sensitive receptors. More specifically, this measure would require study of current truck routes, in consideration of the number and type of each vehicle, destination/origin of each vehicular trip, time of day/week analysis, vehicle miles traveled and emissions. The truck routing study would also identify alternative truck routes and their impacts on VMT, GHG emissions, and air quality.

B2-9

Additionally, as related information, the City has committed to working with the District to commission a heavy-duty truck rerouting study for the community in the adopted CERP for South Central Fresno. The District recommends that this study be discussed in the General Plan as appropriate, and look forward to working with the City to move forward with this project, including identifying co-funding opportunities to ensure maximum leveraging of funding.

5d) Operational Related Emissions – Under-fired Charbroilers

Future development projects for restaurants with under-fired charbroilers may pose the potential for immediate health risk, particularly when located in densely developed locations near sensitive receptors. Since the cooking of meat can release carcinogenic PM2.5 species like polycyclic aromatic hydrocarbons, controlling emissions from new under-fired charbroilers will have a substantial positive impact on public health. The air quality impacts on neighborhoods near restaurants with under-fired charbroilers can be significant on days when meteorological conditions are stable, when dispersion is limited and emissions are trapped near the surface within the surrounding neighborhoods. This potential for neighborhood-level concentration of emissions during evening or multi-day stagnation events raises environmental concerns.

B2-10

Furthermore, reducing commercial charbroiling emissions is essential to achieving attainment of multiple federal PM2.5 standards and associated health benefits in the Valley. Therefore, the District recommends that the General Plan include a measure requiring the assessment and potential installation, as technologically feasible, of particulate matter emission control systems for new large restaurants operating under-fired charbroilers. The District is available to assist the City and project proponents with this assessment. Additionally, to ease the financial burden for Valley businesses, the District is currently offering substantial incentive funding that covers the full cost of purchasing, installing, and maintaining the system for

up to two years. Please contact the District at (559) 230-5800 or technology@valleyair.org for more information.

B2-10 cont.

5e) Voluntary Emission Reduction Agreement

Per the Draft PEIR, the City recognizes that a Voluntary Emission Reduction Agreement (VERA) is a method available for projects to mitigate significant criteria pollutant impacts. The District supports the City's acknowledgment that a VERA should be considered for projects with significant air impacts.

A VERA is a mitigation measure by which the project applicant provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project applicant and the District enter into a contractual agreement in which the project applicant agrees to mitigate Project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-specific regional impacts on air quality can be fully mitigated. Types of emission reduction projects that have been funded in the past include replacement of old heavy-duty trucks with new, cleaner, heavy-duty trucks, electrification of stationary internal combustion engines (such as agricultural irrigation pumps), and replacement of older school buses.

B2-11

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-specific regional emissions have been mitigated to less than significant. To assist the Lead Agency and project applicant in ensuring that the environmental document is compliant with CEQA, the District recommends the Draft PEIR includes an assessment of the feasibility of implementing a VERA.

Additional information on implementing a VERA can be obtained by contacting District CEQA staff at by email at CEQA@valleyair.org or by phone at (559) 230-6000.

5f) Allowed Uses Not Requiring Project-Specific Discretionary Approval

In some cases, for future development projects, the City may determine that a proposed project be approved as an allowed use not requiring a project-specific discretionary approval from the City. The District recommends the General Plan include language supported by policy requiring such projects to prepare a technical assessment in consultation with the District, and recommending that a VERA be

B2-12

considered for development projects determined to have a significant impact on air quality. For example, this requirement would apply to large development projects (i.e. large residential project, large distribution center, large warehouse, etc.) that would have the potential to significantly impact air quality and is determined by the City to be allowed by use, not requiring a project specific discretionary approval from the City.

B2-12 cont.

Furthermore, to strengthen City policies for allowed uses, the District recommends that only future development projects resulting in a less than significant impact for all District CEQA applicable thresholds be eligible for an allowed use approval. Projects exceeding any District CEQA significance threshold should be required to receive a discretionary approval from the City.

5g) Health Risk Screening/Assessment

A Health Risk Screening/Assessment identifies potential Toxic Air Contaminants (TAC's) impact on surrounding sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. TACs are air pollutants identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB). A list of TACs which post a present or potential hazard to human health can be found at:
https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants

The District recommends the future development project(s) be evaluated for potential health impacts to surrounding receptors (on-site and off-site) resulting from operational and multi-year construction TAC emissions.

i) The District recommends conducting a screening analysis that includes all sources of emissions. A screening analysis is used to identify projects which may have a significant health impact. A prioritization, using the latest approved California Air Pollution Control Officer's Association (CAPCOA) methodology, is the recommended screening method. A prioritization score of 10 or greater is considered to be significant and a refined Health Risk Assessment (HRA) should be performed.

B2-13

For your convenience, the District's prioritization calculator can be found at:
http:www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION%20RMR%202016.XLS.

ii) The District recommends a refined HRA for development projects that result in a prioritization score of 10 or greater. Prior to performing an HRA, it is recommended that development project applicants contact the District to review the proposed modeling protocol. A development project would be considered to have a significant health risk if the HRA demonstrates that the project related health impacts would exceed the Districts significance threshold

of 20 in a million for carcinogenic risk and 1.0 for the Acute and Chronic Hazard Indices, and would trigger all feasible mitigation measures. The District recommends that development projects which result in a significant health risk not be approved.

For HRA submittals, please provide the following information electronically to the District for review:

- HRA AERMOD model files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodology.

More information on toxic emission factors, prioritizations and HRAs can be obtained by:

- E-Mailing inquiries to: hramodeler@valleyair.org; or
- Contacting the District by phone for assistance at (559) 230-6000; or
- Visiting the Districts website (Modeling Guidance) at: http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

B2-13 cont.

5h) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of the ambient air quality standards. For future development projects the District recommends that an AAQA be performed for the project if emissions exceed 100 pounds per day of any pollutant.

If an AAQA is performed, the analysis should include emissions from both project specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance is available online at the District's website: www.valleyair.org/ceqa.

B2-14

5i) Nuisance Odors

Future development projects should be evaluated to determine the likelihood that the project would result in nuisance odors. Nuisance odors may be assessed qualitatively taking into consideration project design elements and proximity to off-site receptors that potentially would be exposed to objectionable odors. The intensity of an odor source's operations and its proximity to sensitive receptors influences the potential significance of odor emissions. Any project with the

B2-15

potential to frequently expose members of the public to objectionable odors should be deemed to have a significant impact and should be required to implement all feasible mitigation measures.

B2-15 cont.

5j) District Rule 9510 (Indirect Source Review)

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM10 emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of completed development projects. The Rule requires all developers whose projects are applicable to the Rule to mitigate their NOx and PM10 emissions by incorporating clean air design elements into their development projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee which ultimately funds incentive projects to achieve off-site emissions reductions.

Accordingly, a future development project within the City of Fresno General Plan area would be subject to District Rule 9510 if upon full buildout, the project would equal or exceed any of the following applicability thresholds, depending on the type of development, and the land use agency's approval mechanism:

Development Type	Discretionary Approval Threshold	Ministerial Approval Threshold
Residential	50 dwelling units	250 dwelling units
Commercial	2,000 square feet	10,000 square feet
Light Industrial	25,000 square feet	125,000 square feet
Heavy Industrial	100,000 square feet	500,000 square feet
Medical Office	20,000 square feet	100,000 square feet
General Office	39,000 square feet	195,000 square feet
Educational Office	9,000 square feet	45,000 square feet
Government	10,00 square feet	50,000 square feet
Recreational	20,000 square feet	100,000 square feet
Other	9,000 square feet	45,000 square feet

B2-16

District Rule 9510 also applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two (2.0) tons of NOx or two (2.0) tons of PM10.

In the case the future development project(s) are subject to District Rule 9510, an Air Impact Assessment (AIA) application is required and the District recommends that demonstration of compliance with District Rule 9510, before issuance of the first building permit, be made a condition of Project approval.

Information about how to comply with District Rule 9510 can be found online at: http://www.valleyair.org/ISR/ISRHome.htm.

The AIA application form can be found online at: http://www.valleyair.org/ISR/ISRFormsAndApplications.htm.

District staff is available to provide assistance with determining if future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-6000 or by email at ISR@valleyair.org.

B2-16 cont.

5k) District Rule 9410 (Employer Based Trip Reduction)

Future development projects may be subject to District Rule 9410 (Employer Based Trip Reduction) if the Project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

B2-17

Information about how District Rule 9410 can be found online at: http://www.valleyair.org/Programs/Rule9410TripReduction/eTRIP_main.htm.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org.

5l) Air Quality Permitting: District Rules 2010 and 2201

Future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and will require District permits. In general, facilities with equipment that may emit air pollution or is used for controlling air pollution are subject to permit requirements. Prior to construction, the future development project proponent should submit to the District an application for an Authority to Construct (ATC).

B2-18

For further information or assistance, the project proponent can contact the District's Small Business Assistance (SBA) office at (559) 230-5888, or visit https://www.valleyair.org/busind/pto/ptoprocess.htm#who.

5m) Other District Rules and Regulations

Future development projects may also be subject to the following District rules: Regulation VIII, (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

B2-19

Comment Letter B2 cont.

The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to future project or to obtain information about District permit requirements, project applicants are strongly encouraged to contact the District's Small Business Assistance Office at (559) 230-5888.

Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm.

B2-19 cont.

5n) Referral Documents.

Referral documents provided to the District for review for new development projects should include a project summary detailing, at a minimum, the land use designation, project size, and proximity to sensitive receptors and existing emission sources.

B2-20

If you have any questions or require further information, please contact Eric McLaughlin by e-mail at Eric.McLaughlin@valleyair.org or by phone at (559) 230-5808.

B2-21

Sincerely,

Brian Clements
Director of Permit Services



John Stagnaro
Program Manager

BC: em

Comment Letter C1

LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

GOLDEN GATE UNIVERSITY SCHOOL OF LAW
ENVIRONMENTAL LAW AND JUSTICE CLINIC

May 10, 2021

Sophia Pagoulatos
Planning Manager
Development and Resource Management Department
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721
Sent via email

RE: City of Fresno General Plan Recirculated Draft Programmatic Environmental Impact Report and Greenhouse Gas Reduction Plan (SCH # 2019050005)

Dear Ms. Pagoulatos:

We are submitting this letter on behalf of South Fresno Community Alliance, Friends of Calwa, and Fresno Building Healthy Communities. Leadership Counsel for Justice and Accountability submitted comments on the Draft PEIR ("DPEIR") on May 5, 2020 ("May 2020 comments"). *See* Fresno General Plan Response to Comments Document, SCH 2019050005, July 2020 ("Response to Comments") at Comment Letter C-3; C-69 to C-123. Shute, Mihaly and Weinberger, LLP submitted additional comments to the City on the DPEIR on Leadership Counsel's behalf on August 19, 2020 ("August 2020 comments"). See Attachment 1, SMW August 2020 Comments. These letters raised serious concerns about the inadequacies of the DPEIR and the consequences of these inadequacies to South Fresno neighborhoods which the General Plan designates for thousands of acres of industrial development.

Despite Leadership Counsel and Shute, Mihaly and Weinberger's efforts to inform the City in detail of the DPEIR's deficiencies and their requests that the City correct these deficiencies and recirculate the corrected DPEIR for public review and comment, the RPEIR makes only minor revisions to three sections of the DPEIR (Air Quality, Greenhouse Gas Emissions, and Transportation) and to DPEIR Appendix G, the Greenhouse Gas Reduction Plan ("GGRP"). These minor revisions fail to correct the DPEIR's deficiencies, including the DPEIR's illegal truncated description of the Project, its inadequate analysis of the Project's significant impacts for a range of impact categories, and its failure to identify enforceable mitigation measures or a reasonable range of alternatives to the Project that will avoid or reduce environmental impacts, among other flaws. As a result, the DPEIR and RPEIR continue to fail to comply with the requirements of the California Environmental Quality Act (CEQA) (Public Resrouces Code sections 2100, *et seq.*), the CEQA Guidelines (California Code of Regulation, title 14 sections 15000, *et seq.*) and the GGRP, which fails to meet the requirements of CEQA Guidelines section 15183.5, cannot be used to support streamlined project-level GHG analysis. Further. the City's continued refusal to disclose and analyze the Project's significant impacts on South Fresno communities and identify mitigation and alternatives that would reduce those impacts conflicts with the City's duties under state and federal fair housing and civil rights laws. *See e.g.,* Government Code §§ 11135, 12900, *et seq*.; 65008, 8899.50; 42 U.S.C. § 2000d, *et seq.*, 3601, *et seq*., 5304(b)(2)&(s)(7B), & 12075.

C1-1

This letter describes below the DPEIR and RPEIR's failures to comply with CEQA's requirements and provides the City once again with specific information about revisions the City can make to come into compliance. Leadership Counsel's May 2020 comments and Shute, Mihaly, and Weinberger's August 2020 comments are also hereby incorporated into this letter by reference. Furthermore, we reserve the right to submit additional comments on this matter to the City. We ask that the City revise and recirculate the DPEIR for public review and comment to address the legal deficiencies detailed in this letter. Doing so is both the City's legal obligation and an ethical imperative to ensure that City policy and actions support quality of life, environmental quality, and public health for South Fresno residents.

C1-1 cont.

I. The RPEIR's Flawed Project Description Conflicts with CEQA's Mandate to Review the Impacts of the "Whole of an Action" and Undermines the Entire PEIR

The City's recirculated PEIR fails to correct the PEIR's ill-defined description of the project and its truncated environmental review stemming from that flawed description. As a result, the City has prepared a deficient environmental document that fails to serve its required informational purpose, in violation of CEQA.

An EIR must accurately and consistently describe the project it analyzes. CEQA Guidelines § 15124; Guidelines § 15378 (defining "project"); *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-3 ("An accurate, stable, and finite project description is the sine qua non of an informative and legally sufficient EIR."). As a result, courts have found that, even if an EIR is adequate in all other respects, the use of a "truncated project concept" violates CEQA and requires the conclusion that the lead agency did not proceed in a manner required by law. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730. An inaccurate or incomplete project description undermines CEQA's purposes because it thwarts a full analysis of project impacts, thus minimizing the project's effects. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656. Thus, when an EIR gives "conflicting signals to decision-makers and the public about the nature and scope of the activity being proposed," the courts have found it "fundamentally inadequate and misleading." *San Joaquin Raptor Rescue Center*, 149 Cal.App.4th at 655-56.

C1-2

As we have critiqued in prior comment letters, the PEIR – and now the RPEIR – has precisely the type of conflicted and confusing project description that CEQA prohibits, and creates uncertainty about the nature of the action under review. Specifically, the RPEIR states that the Project consists of "updating the EIR to include a current baseline for the continued implementation of the General Plan," and that the Project also includes minor edits to the General Plan "to reflect changes in applicable statutes and regulations related to Vehicle Miles Traveled (VMT), . . . changes in City planning documents since adoption of the General Plan in 2014", and "an update to the City's Greenhouse Gas Reduction Plan." RPEIR at 3-2. The RPEIR further explains that in taking these actions "the City is converting the previously-certified MEIR to a PEIR with the goal of extending the life of the environmental document for the General Plan." RPEIR at 3-2.

This description of the Project sows doubt about the scope of environmental impacts, especially those resulting from General Plan implementation, that the RPEIR intends to and does analyze. In describing the RPEIR as a conversion of the General Plan MEIR to a PEIR (RPEIR

at 3-2), the City suggests that the RPEIR will serve as a complete, standalone EIR for the City's General Plan. And in explaining why the RPEIR generally uses a 2019 baseline, in contrast to the earlier baseline used in the MEIR, the RPEIR asserts:

> "Baseline conditions other than 2019 would therefore not achieve CEQA's objective of informing the public and decision makers as to the potential impacts of the project compared with the baseline of the physical conditions at the time of publication of the Notice of Preparation. Therefore, if the PEIR used the same baseline as the MEIR, approximately five years of development in physical environmental conditions would not be accounted for and *would not provide an accurate assessment of potential environmental effects that have occurred or would occur through continued implementation of the approved General Plan*." RPEIR at 3-5 (emphasis added).

However, this statement demonstrates the problem in the RPEIR's approach. By including five years of development in the baseline, the RPEIR fails to address these impacts at all—even though that development is part of the General Plan. By characterizing the Project as simply "updating the EIR to include a current baseline for the continued implementation of the General Plan" (RPEIR at 3-2; *see also id*. at 3-5, 4-1) the RPEIR artificially and incorrectly limits the scope of the project subject to environmental review.[1] Given that the City has prepared a new EIR for its General Plan, that EIR must analyze and mitigate all significant environmental impacts associated with the General Plan's implementation. Yet the City takes the position that it need not do so because it adopted the General Plan and because it previously prepared an EIR (i.e. the MEIR) for the General Plan. For example, the RPEIR states:

C1-2 cont.

> "The City is not proposing any land use designation changes as part of the project, and the project will not result in any direct physical changes or new land uses. All previous changes to land use designations since the adoption of the General Plan in 2014 have already been evaluated under CEQA, as applicable, and those changes do not result in any new potential environmental impacts to be considered as part of this project." RDEIR at 3-5.

This position echoes similar statements in the PEIR's Response to Comments that the PEIR need not review impacts from implementation of the General Plan's land use policies, because the City does not propose to amend those policies and because the General Plan has already been adopted. For example, the Response to Comments states:

> "The General Plan, as a whole, is not being considered to be re-adopted. The City is not modifying the City's current land use plan, and the proposed project does not result in any direct physical changes or new land uses. . . . Any previous changes to the land use plan, including General Plan amendments, adoption of Specific Plans, and approval of various projects throughout Fresno, have already been evaluated under CEQA, as applicable, and those changes, by definition do not result in any new potential

[1] Notably, the PEIR never clearly defines what "continued implementation of the General Plan" actually means, heightening uncertainty about the EIR's scope.

> environmental impacts to be considered or evaluated as part of the proposed project." Response to Comments at 3-3.

See also Response to Comments, pp. 3-70, 71, 72, 74, 78, 80 (making similar assertions in responding to Leadership Counsel's critiques of the PEIR's failure to adequately analyze or mitigate the General Plan's impacts).

As these statements demonstrate, the City has prepared an EIR that it *admits* does not provide a full portrait of the General Plan's environmental impacts. Moreover, by refusing to consider any changes to the General Plan, the City has undermined one of the key functions of CEQA—to address a project's impacts and determine whether changes or alternatives to the project could reduce those impacts. By taking as a given the level and type of development approved under the General Plan in 2014 and refusing to reconsider any element of the Plan, the RPEIR ignores one of its fundamental purposes under CEQA. The RPEIR then compounds this error with its intention to allow other projects and plans to tier from it for their own environmental review.

In describing the Project as "continued implementation of the approved General Plan," and picking and choosing which impacts of General Plan implementation to review, the RPEIR fails to describe the whole of the action. A fundamental premise of CEQA is that a lead agency must consider the environmental impacts of the whole of the action being approved, not segmented pieces. CEQA Guidelines § 15378(a) (defining "project"). CEQA prohibits segmentation of a project. *See Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1229 ("when one activity is an integral part of another activity, the combined activities are within the scope of the same CEQA project" and must be analyzed together); Guidelines § 15378(a) ("'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."); *see also* CEQA Guidelines § 15378(c) (term "project" means the whole of the "activity which is being approved"). Because the statute requires study of "the whole of an action," CEQA prohibits public agencies from "subdivid[ing] a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole." *Orinda Assn. v. Bd. of Supervisors* (1986) 182 Cal.App.3d 1145, 1171. Breaking the project into smaller sub-projects will lead to inadequate environmental review. See, e.g., *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1452 (citation omitted) (CEQA "mandates 'that environmental considerations do not become submerged by chopping a large project into many little ones'" which, individually, may have lesser environmental effects but which together may be "disastrous.").

Here, the "whole of the action" includes all of the development permitted under the General Plan. However, the RPEIR, by proposing to only review the adopted General Plan's "continued implementation," has effectively segmented the review of the General Plan into two projects—the first five years of development under the General Plan, which have now been subsumed into the baseline, and the next 15 years of development that fall under the Plan's planning horizon. At the same time, however, the City refuses to consider any changes to the General Plan itself that could address its significant impacts. Instead, the General Plan will continue to be implemented as previously approved, but the City has truncated its review such that it avoids the obligation to ensure the impacts of the project as a whole are addressed. Nor does the City consider any alternatives that even attempt to reduce any of the significant and

C1-2 cont.

unavoidable impacts identified in the RPEIR. For example, the RPEIR evaluates a net zero energy alternative for commercial buildings that would reduce GHG and energy impacts—impacts that the RPEIR already finds (incorrectly) less than significant, but ignores alternatives—such as a low VMT alternative—that would address potentially significant impacts.

This results in an incomplete and inaccurate impacts analysis that significantly underestimates the impacts of General Plan implementation. The RPEIR must be revised to evaluate the full scope of development permitted under the General Plan. If it does not do so, the must define an actual project for review and subject it to the review CEQA requires, including consideration of alternatives and mitigation measures that could reduce the project's impacts, as well as a complete assessment of the impacts of the full scope development permitted by the project.

C1-2 cont.

II. General Comments

C1-3

The following are our general comments on the legal inadequacies of the PEIR. More specific comments on individual sections of the document follow.

A. The DPEIR and RPEIR Improperly Attempt to Avoid Analysis and Mitigation of the General Plan's Impacts by Concluding That They Are Significant and Unavoidable

Where all available and feasible mitigation measures have been proposed, but are inadequate to reduce an environmental impact to a less-than-significant level, an EIR may conclude that the impact is significant and unavoidable. See CEQA Guidelines § 15126.2. If supported by substantial evidence, the lead agency may make findings of overriding considerations and approve the project in spite of its significant and unavoidable impacts. Id. at §§ 15091, 15093. However, the lead agency cannot simply conclude that an impact is significant and unavoidable and move on. A conclusion of residual significance does not excuse the agency from (1) performing a thorough evaluation and description of the impact and its severity before and after mitigation, and (2) proposing all feasible mitigation to "substantially lessen the significant environmental effect." CEQA Guidelines § 15091(a)(1); *see also id*. § 15126.2(b) (requiring an EIR to discuss "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance" (emphasis added). "A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely." 1 Stephen Kostka & Michael Zischke, Practice Under the California Environmental Quality Act § 14.6 (2d ed. 2008).

C1-4

The PEIR finds that the City's plans for future growth and development as set out in the General Plan will result in significant and unavoidable impacts in multiple topic areas. Draft PEIR at 1-9 to 1-46. As detailed below, in numerous instances, the PEIR fails to thoroughly assess impacts deemed to be significant and unavoidable and/or fails to identify all feasible mitigation measures to reduce the severity of the impacts.

B. The PEIR Fails to Analyze the Impacts of All Development That Could Occur as a Result of Buildout under the General Plan.

The General Plan acknowledges the harmful effects of unrestricted growth in the City, including increased reliance on personal automobile use and the inability to provide efficient public transit service to new development, which leads to increased air pollution and greenhouse gas emissions. General Plan, pp. 3-6, 3-7, and 7-7. Yet, the General Plan proposes land use policies that fail to limit development in future growth areas. Specifically, the General Plan includes objectives and policies that address growth by "promoting" development in certain parts of the City. (See, e.g., Objective UF-12 directing the City to locate roughly one half of future residential development in infill areas; and PEIR at 4.3-28 emphasis added.) However, the General Plan is unclear regarding the definitions for terms such as "roughly" and "approximately" as applied in the Plan. Specifically, the General Plan states that use of these terms is intended to be flexible so that depending on context, a reference to "approximately one-half" could vary at least 10 to 15 percent and use of the term "roughly" could include twice that amount or more. General Plan at 1-30. These vague definitions have important implications when applied to planning policy.

For example, General Objective UF-12 directs the City to locate "roughly one half" of future residential development in infill areas. But given the General Plan's flexible definition of the word "roughly," anywhere from 20 percent to over 80 percent of future development could occur in infill areas. General Plan at 1-28 and 1-29. Such "infill" developments in the city have included several sprawl developments, including city islands, east of Highway 180 bordering Clovis and west of Highway 99. However, the DPEIR presents only one set of estimates for the amount of anticipated development at build-out. See DPEIR Table 3-3. Thus, the DPEIR fails to disclose its assumptions for the amount of infill used (i.e., 20 percent, 50 percent, or 80 percent of development in infill areas at build-out) for the analyses of the Project's environmental impacts. Given that the Plan allows a broad range of development to occur outside of infill areas, the PEIR must evaluate potential impacts that would occur if only 20 percent of anticipated future development were to take place in identified infill areas, or better yet, revise General Objective UF-12 to ensure the majority of future development occurs in infill areas and define infill areas with sufficient precision to promote reduced automobile travel. If the majority of Project-related growth takes place outside the identified infill areas, Project impacts related to transportation, air quality and greenhouse gases would be much worse than the DPEIR indicates. These impacts would be even more severe in disadvantaged communities that are already over-burdened with pollution and inadequate access to transit.

C1-5 cont.

C. The DPEIR Ignores Feasible Mitigation, Such as Changes to the Land Use Designations and Densities and Intensities Proposed in the General Plan

For several of the General Plan's significant and unavoidable impacts, notably the Project's significant impacts related to greenhouse gas emissions, the DPEIR fails to consider all feasible mitigation. The DPEIR never considers changes to land use designations or densities and intensities as potential mitigation even though such changes could significantly reduce greenhouse gas emissions and other significant impacts disclosed in the DPEIR. CEQA requires the EIR to consider such mitigation.

The City cannot approve projects with significant environmental impacts if any feasible mitigation measure or alternative is available that will substantially lessen the severity of any impact. Pub. Res. Code § 21002; CEQA Guidelines § 15126(a). The City is legally required to mitigate or avoid the significant impacts of the projects it approves whenever it is feasible to do so. Pub. Res. Code § 21002.1(b). "In the case of the adoption of a plan, policy, regulation, or other public project [such as the General Plan], mitigation measures can be incorporated into the plan, policy, regulation, or project design." CEQA Guidelines § 15126.4(a)(2). Mitigation is defined by CEQA to include "[m]inimizing impacts by limiting the degree or magnitude of the action and its implementation." CEQA Guidelines § 15370(b). In addition to proposing new "policies" as mitigation, mitigation should include changes in where development is planned, what kind is planned, and how dense or intense that development is planned to be, i.e., changes to the land use diagram and land use designations. C1-6

There is no indication that the DPEIR considered modifications to land use designations or densities and intensities to mitigate the impacts of the General Plan. This omission is surprising given that those changes are the easiest, most effective, and most obvious ways to lessen or avoid many of the General Plan's impacts. For example, the Plan has resulted, and will continue to result in, locating a substantial amount of new industrial uses in close proximity to existing and proposed residential areas. DPEIR at Figure 3-5 Growth Areas; General Plan Implementation Element Figure IM-2. This will in turn result in increased exposure of sensitive receptors, especially disadvantaged communities, to substantial pollutant concentrations. DPEIR at 4.3-57 and 58. As explained in previous comments, exploring alternative land use scenarios would go a long way toward reducing numerous significant General Plan impacts identified in the DPEIR, and with the MEIR before it, such as air quality, public health, climate change, traffic, and noise.

D. The PEIR Cannot Rely on Unenforceable and Noncommittal General Plan Policies to Mitigate the Project's Significant Impacts

C1-7

Mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions, agreements, or other legally binding instruments. Pub. Res. Code §

21081.6(b); CEQA Guidelines § 15126.4(a)(2). The PEIR relies on a number of General Plan policies to mitigate significant environmental impacts. See, for example, DPEIR at 4.3-47, 4.3-55, 4.3-59. Many of these General Plan policies and programs are vague, optional, directory, or otherwise unenforceable.

For example, the Plan fails to provide enforceable policies that direct orderly growth. Instead, the Plan includes policies that call for "promoting" development in certain parts of the City. See, e.g., Policy LU-1-a (directing the City to promote development within the existing City Limits and in infill areas); Policy LU-1-c (directing the City to promote order land use development in pace with public facilities and services needed to serve development) (emphasis added). These vague and unenforceable policies fail to describe how the City will promote and enforce an orderly growth process and fail to ensure that infill development will occur prior to development in the Growth Areas. General Plan Implementation Element at 12-30.

A other examples of ineffective mitigation—out of numerous instances—include the following (emphases added):

- Policy RC-8-c: Energy Conservation in New Development. Consider providing an incentive program for new buildings that exceeds California Energy Code requirements by fifteen percent. Draft PEIR at 4.3-33.
- Policy RC-8-j: Alternative Fuel Network. Support the development of a network of integrated charging and alternate fuel stations for both public and private vehicles, and if feasible, open up municipal stations to the public as part of network development. Id. at 4.3-34.
- Policy LU-2-b: Infill Development for Affordable Housing. Consider a priority infill incentive program for residential infill development of existing vacant lots and underutilized sites within the City limits as a strategy to help to meet the affordable housing needs of the community. Id. at 4.6-15.
- Policy LU-6-b: Consider adopting commercial development guidelines to assure high quality design and site planning for large commercial developments, consistent with the Urban Form policies of this Plan. Id. at 4.6-16.
- Policy LU-1-e: Annexation Requirements. Consider implementing policies and requirements that achieve annexations to the City that conform to the General Plan Land Use Designations and open space and park system, and are revenue neutral and cover all costs for public infrastructure, public facilities, and public services on an ongoing basis. *Id*. at 4.10-10.
- Policy LU-2-a: Infill Development and Redevelopment. Promote development of vacant, underdeveloped, and redevelopable land within the City Limits where urban services are available by considering the establishment and implementation of supportive regulations and programs. *Id*. at 4.11-11.
- Policy D-4-b: Incentives for Pedestrian-Oriented Anchor Retail. Consider adopting and implementing incentives for new pedestrian-friendly anchor retail at

C1-7 cont.

intersections within Activity Centers and along corridors to attract retail clientele and maximize foot traffic. Id. at 4.6-17.

- Policy D-4-f: Design Compatibility with Residential Uses. Strive to ensure that all new nonresidential land uses are developed and maintained in a manner complementary to and compatible with adjacent residential land uses, to minimize interface problems with the surrounding environment and to be compatible with public facilities and services. Id. at 4.1-10 and 11.

A general plan's goals and policies are necessarily general and aspirational. The City may rely on such policies to mitigate environmental impacts under CEQA, however, only if they will be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. *See Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 358 (citing *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 377). CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1186-87; *Fed'n of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.

Here, the General Plan's vague, unenforceable, and noncommittal policies and programs (and policies for which no implementation programs are identified) allow the City to take no action and thus fail to mitigate impacts. As a result, the PEIR cannot ensure that the policies relied on as mitigation measures will ever in fact be implemented. Therefore, they cannot serve as CEQA mitigation. *See Anderson First,* 130 Cal.App.4th at 1186-87.

C1-7 cont.

III. The RPEIR's Analysis of and Mitigation for the General Plan's Transportation Impacts is Factually and Legally Deficient

Leadership Counsel's May 2020 comments and Shute, Mihaly & Weinberger's August 2020 comments alerted the City to deficiencies in the Draft PEIR's and Final PEIR's analysis of the General Plan's transportation impacts, relating both to VMT and impacts on pedestrians, cyclists, and transit riders. Despite recirculating the transportation section of the EIR, the RPEIR's transportation analysis suffers from many of the same flaws as the earlier documents. The RPEIR must be remedied if the public and decisionmakers are to fully understand the General Plan's potential effects.

C1-8

A. The RPEIR Fails to Adequately Analyze Impacts Relating to Conflicts with Programs and Policies Addressing Transit, Bicycle and Pedestrian Facilities

The RPEIR relies on CEQA's Appendix G's thresholds of significance. To this end, the RPEIR determines that implementation of the approved General Plan would result in a significant impact related to transportation if it would conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian

C1-9

facilities. RPEIR at 4.16-36. Unfortunately, the RPEIR fails entirely to analyze how implementation of the General Plan would affect programs, plans, ordinances, and policies pertaining to bicycles, pedestrians and transit.

The RPEIR focuses exclusively on the adopted General Plan's conflict with auto-based policies (i.e., policies intended to ensure efficient operations of roadways and intersections). *See e.g.*, RPEIR pp. 4.16-38 through 4.16-41 discussing how General Plan implementation conflicts with the General Plan Mobility and Transportation Element's policies intended to reduce traffic congestion. While the General Plan's Mobility and Transportation Element contains numerous policies and objectives intended to ensure that development does not adversely impact travel by pedestrian and bicycles, the RPEIR makes no attempt to determine whether the growth and development contemplated by implementation of the General Plan would be inconsistent with these policies and objectives.

For example, several General Plan policies and objectives call for planning for "complete streets," improving quality of life, implementing traffic calming measures, redesigning streets to support non-automobile travel modes, prioritizing bikeway improvements, retrofitting streets to improve bicycle and pedestrian safety, and taking measures to minimize vehicular and pedestrian conflicts. *See* RPEIR at 4.16-21 through 4.16-29 (citing Plan policies MT-1-e: Ensure Interconnectivity Across Land Use, MT-1-f: Match Travel Demand with Transportation Facilities, GP Policy MT-1-g: Complete Streets Concept Implementation, Policy MT-1-i: Local Street standards, Policy MT-2-d: Street Redesign where Excess Capacity Exist, Policy MT-2-g: Transportation Demand Management and Transportation System Management; Objective MT-4, MT-4-b: Bikeway Improvements; MT-5-b: Sidewalk Requirements, and Policy MT-2-d: Street Redesign where Excess Capacity Exist). All of these policies and objectives are intended to reduce travel by automobile and promote walking and bicycling. Yet implementation of the General Plan would result in a substantial increase in VMT and traffic congestion (as evidenced by the increase in number of intersections operating at deficient LOS levels) and thus would be directly at odds with these important General Plan policies and objectives. But the RPEIR omits any analysis of these conflicts. Consequently, the City is not only in violation of CEQA for not analyzing these inconsistencies, it is also missing a critical opportunity to promote alternative modes of travel. Moreover, the conflicts that General Plan implementation would create with these General Plan policies and objectives constitutes a significant impact. *See* RPEIR at 4.16-36 (the project would have a significant impact related to transportation if it would "[c]onflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.")

C1-9 cont.

The RPEIR also fails to acknowledge that General Plan implementation would be clearly inconsistent with policies in the Mobility and Transportation Element that call for reducing VMT. For example, Policy MT-2-b: Reduce Vehicle Miles Traveled and Trips and Policy MT-2-c: Reduce VMT through Infill Development (pp. 4.16-2- through 4.16-24) call for implementing various strategies to reduce VMT including through the provision of incentives for infill development. Because the General Plan would result in a substantial increase in VMT, it would be clearly inconsistent with these policies. The RPEIR's failure to acknowledge the General Plan's inconsistency with these policies is another serious flaw and this inconsistency constitutes a significant impact.

Finally, the RPEIR fails to analyze how General Plan implementation would conflict with applicable transit policies. Here, the RPEIR errs in two ways. First, it does not analyze the General Plan's inconsistency with the multiple policies calling for the City to increase public

transit (e.g., General Plan Policy MT-8-b: Transit Serving Residential and Employment Nodes, Policy MT-8-c: New Development Facilitating Transit, and Policy MT-8-j: Transit Services, Policy MT-9-c: Addressing Unmet Transit Needs, Policy MT-9-e: Area Specific Transit Improvements). *See* RPEIR at 4.16-32 through 4.16-35. Here too, the RPEIR focuses exclusively on analyzing how the General Plan may conflict with auto-oriented policies and ignores altogether the General Plan's potential to conflict the transit-oriented General Plan policies and objectives.

Second, the RPEIR omits any analysis of how growth resulting from implementation of the General Plan would affect local and regional transit service. The City operates Fresno Area Express (FAX) which operates 17 fixed-route buses, including paratransit services. RPEIR at 4.16-7. The RPEIR fails to provide any information about existing local and regional transit service and does not disclose how growth resulting from General Plan implementation would affect transit service. Buildout of the General Plan could increase transit demand potentially causing overcrowding of buses and the potential for drivers to pass-up waiting passengers. The addition of vehicle traffic generated by the General Plan could also increase bus delay, reduce the ability of FAX to meet its on-time performance and schedule goals, and increased pedestrian safety risks. This could cause people to switch to using private vehicles, increasing the low-occupancy vehicle share of trips causing secondary safety impacts from the increased number of motor vehicles on city streets.

C1-9 cont.

The RPEIR must be revised to evaluate how growth from General Plan implementation would affect the City's bicycle, pedestrian and transit's plans, programs and policies. The revised document must begin this evaluation by estimating existing mode share (e.g., the number of people walking, biking, taking transit, and driving) and then disclose mode share upon build out under the General Plan. Then the RPEIR must also identify any specific bike, pedestrian and transit projects that would be implemented as a result of the General Plan. Finally, the revised RPEIR must identify mitigation for pedestrian, bicycle and transit related impacts.

B. The RPEIR Fails to Adequately Analyze Impacts Relating to VMT and Lacks Support for Its Conclusion That Impacts Relating to VMT Would Be Less than Significant

The RPEIR's analysis of the General Plan's effect on VMT is deficient because it fails to document its assumptions relating to existing and General Plan-related VMT, and because it lacks support for its conclusion that the General Plan's VMT-related impacts would be less than significant.

The RPEIR identifies existing (2019) VMT and VMT under the General Plan in 2035. *See* Table 4.16-B: County and City of Fresno VMT, Draft PEIR at 4.16-43. However, it is not sufficient to simply identify these numbers without providing information about how the RPEIR arrived at these estimates. Meaningful analysis of impacts effectuates one of CEQA's fundamental purposes: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123. To accomplish this purpose, an EIR must contain facts and analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 568. An EIR's conclusions must be supported by substantial evidence. *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 409.

C1-10

As transportation engineer Neal Liddicoat with Griffin Cove Transportation Consulting ("GCTC") explained in his comments on the Draft PEIR, the brevity of the VMT discussion in the PEIR is a function of the "black box" analysis procedure involved. *See* GCTC Report, August 7, 2020, Attachment 2, p. 1. The RPEIR employs precisely the same approach as the Draft PEIR, and suffers from precisely the same flaws, and his comments are therefore equally applicable to the RPEIR. The RPEIR's VMT analysis was completed entirely within the Fresno Council of Governments Regional Travel Demand Model (also referred to as the "Activity-Based Model"). As such, the background assumptions and detailed analysis steps are unknown and it is impossible for the public and decisionmakers to determine whether the VMT estimates are accurate. *Id*. This error is particularly serious because Neal Liddicoat also informed the City of this precise problem in his 2014 comments on the MEIR's transportation analysis. *See* Letter from N. Liddicoat, MRO Engineers to C. Borg, Shute, Mihaly & Weinberger, LLP, September 10, 2014, p. 5, Attachment 3 to this letter: "No information is provided in the DMEIR with regard to the specific input parameters that were used in developing the theoretical thresholds applied in the LOS analysis, whether for freeways or any of the other roadway types presented. Consequently, it is impossible to judge whether the analysis is credible and, moreover, whether the LOS results are valid.").

The RPEIR errs further because it fails to identify mitigation for the significant increase in VMT that would result from implementation of the General Plan. Rather than provide meaningful mitigation for this impact, the RPEIR generally refers to VMT mitigation measures and project alternatives purportedly contained within the City's Guidelines for VMT Thresholds. RPEIR at 4.16-44. The RPEIR does not bother to specifically identify these mitigation measures. Instead the RPEIR simply concludes that VMT-related impacts would be significant and unavoidable. RPEIR at 4.16-44. The RPEIR's lackluster approach to impact analysis and mitigation violates CEQA. A lead agency cannot simply conclude that an impact is significant and unavoidable and move on. A conclusion of residual significance does not excuse the agency from (1) performing a thorough evaluation and description of the impact and its severity before and after mitigation, and (2) proposing all feasible mitigation to "substantially lessen the significant environmental effect." CEQA Guidelines § 15091(a)(1); *see also id*. § 15126.2(b) (requiring an EIR to discuss "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance" (emphasis added). Consequently, the City must consider feasible mitigation measures in a revised and recirculated RPEIR.

The City's CEQA Guidelines for VMT thresholds, adopted June 2020, are an important first step as they set forth measures that, if revised to be more specific and enforceable, could potentially reduce vehicular travel associated with buildout of the General Plan. Indeed, the Guidelines concede that the measures provided in the Guidelines are mere summaries of measures. The Guidelines do nothing more than direct the reader to the "original source" for details and subsequent updates to the mitigation measures. Fresno VMT Guidelines at 42. The City must take the general measures identified in the Guidelines and refine them so that they are able to reduce the General Plan's significant VMT impacts. For example, the revised RPEIR must identify feasible, specific, and efficacious mitigation measures for the following categories:

- Public transportation: expand the City's public transportation network, increase capacity on transit lines, and increase the frequency of transit service; require development to subsidize public transit service upgrades; and require development to provide transit passes;

C1-10 cont.

- Shuttle service: require development to implement shuttle service to reduce motor vehicle trips;
- Electric infrastructure: increase electric vehicle infrastructure (e.g., charging equipment) beyond the levels identified in the General Plan;
- Bicycle and pedestrian: improve pedestrian and bicycle networks; require development to provide bike parking in non-residential projects; and,
- Parking management: limit or eliminate parking supply; unbundle parking costs from property costs.

C1-10 cont.

C. The PEIR Fails to Analyze or Mitigate Significant Impacts on Pedestrians, Cyclists, and Transit Riders

The PEIR does not evaluate the significant impacts on pedestrians, cyclists, and public transit riders that will be caused by increased vehicle miles traveled (VMT) under the General Plan. The PEIR concludes that VMT will increase substantially from the General Plan's implementation. *See* PEIR at 4.16-41. The PEIR acknowledges that this VMT increase will "result in a significant impact [under CEQA]." *Id.* at 4.16-44. As transportation engineer Neal Liddicoat with Griffin Cove Transportation Consulting ("GCTC") explains in his comments on the RPEIR, the RPEIR fails to adequately analyze the General Plan's impact on pedestrians, cyclists, and transit riders. *See* GCTC Report, May 7, 2021, Attachment 4, p. 1. Although the General Plan places a heavy emphasis on the on the importance of pedestrian and bicycle travel in Fresno's future, the RPEIR transportation analysis largely ignores these non-motorized travel modes. *Id.* at 3.

The PEIR's failure to analyze impacts on pedestrians, cyclists and transit riders violates CEQA. CEQA requires the City to evaluate the General Plan's traffic safety impacts on pedestrians, cyclists, and transit riders. *See City of Maywood v. Los Angeles Unified Sch. Dist.,* (2012) 208 Cal. App. 4th 362, 392-95 (holding EIR was inadequate because it failed to analyze and mitigate project impacts on pedestrians). The City must also identify and adopt feasible mitigation measures to reduce those impacts if feasible. Pub. Res. Code § 21083(b)(2); CEQA Guidelines § 15064(h)(1)). Here, however, the PEIR states explicitly that it "does not consider potential impacts on walking, biking, and transit. Pedestrians, bicyclists, transit riders are all users of the roadway system but may not be fully recognized in the traffic operations analysis and the calculation of LOS." PEIR at 4.16-4. It is an understatement to say that the impacts on pedestrians and bicyclists "may not be fully recognized" in the LOS analysis. GCTC Report, at 3. In fact, the impacts on those vulnerable transportation system users have been completely ignored in the RPEIR, as well as in the technical report provided in Appendix J. *Id.* Nor does the PEIR identify any feasible mitigation measures to address the potentially significant VMT impacts. The City's failure here "precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." *Ass'n of Irritated Residents v. Cty. of Madera* (2003) 107 Cal. App. 4th 1383, 1391.

C1-11

The failure to address pedestrian safety is particularly concerning given recent trends in pedestrian fatalities. GCTC Report at 5-6 & Tables 2 & 3. VMT increases are concomitant with increased traffic fatality rates. *See* Hamed Ahangari, et al., *Automobile-dependency as a barrier to vision zero, evidence from the states in the USA*, ACCIDENT ANALYSIS & PREVENTION, Vol.

107 (2017), at 77-85[2]. The fatalities and other negative impacts caused by increased VMT are not limited to motorists; increases in vehicle travel negatively affect pedestrians, cyclists, and many transit users. *See* Governor's Office of Planning and Research, *Technical Advisory: On Evaluating Transportation Impacts in CEQA* (December 2018), at 7.[3] Again, pedestrians and bicyclists are vulnerable users of the transportation system, as they are not protected by thousands of pounds of vehicular structure, airbags, and other such safety devices. GCTC Report at 7. In 2018, 64 percent of deadly vehicle collisions in Fresno involved pedestrians.[4] Pedestrians are 1.5 times more likely than passenger vehicle occupants to be killed in a car crash. GCTC Report at 7. In California, more than one quarter of people killed in motor vehicle collisions are pedestrians, bicyclists, or users of other non-motorized modes. Fang, et al., *Cutting Greenhouse Gas Emissions Is Only the Beginning: A Literature Review of the Co-Benefits of Reducing Vehicle Miles Traveled*, U.C. DAVIS WHITE PAPER (March 2017).[5]

Although VMT increases are directly related to pedestrian and cyclist deaths and negative impacts on residents that rely on public transportation, the RPEIR does not analyze or attempt to mitigate these impacts. The PEIR lists certain General Plan policies relating to walking, biking, and public transportation. *See* GCTC Report at 4. The RPEIR also discusses the City's Active Transportation Plan—a plan which was adopted after the General Plan and which is not a component thereof. However, the RPEIR does not include any discussion of how the General Plan itself might impact pedestrians, cyclists, or public transit users, and to what extent the policies identified affect the impacts. *See id.* Indeed, the impacts on pedestrians and bicyclists are not addressed within the RPEIR in terms of either system operational capacity (i.e., will the City be able to accommodate the demand for these non-motorized travel modes?) or, more importantly, safety GCTC Report at 4. This failure does not satisfy CEQA's informational mandate.

C1-11 cont.

The RPEIR's failure to address these impacts is particularly concerning because increased VMT raises environmental justice concerns. Increased VMT will cause impacts on residents of lower-income neighborhoods and neighborhoods of color in South Fresno, which disproportionately rely on active transportation and public transit. *See* City of Fresno, Active Transportation Plan, at Figure 37.[6] These neighborhoods also lack basic infrastructure (e.g., sidewalks, streetlights, crosswalks, storm water drainage) to accommodate walking and biking safely. *See, e.g.* General Plan at 4-16 & 3-66 to 3-68. For instance, the route that many schoolchildren take to Orange Center Elementary School lacks sidewalks, stormwater drainage, safety installations and even a crosswalk on East Central Avenue, which is a primary route for truck traffic.

These disproportionate impacts are exacerbated by the General Plan's designation of these same neighborhoods for heavy industrial and warehouse development—which the RPEIR

[2] Available at https://blinktag.com/induced-travel-calculator/downloads/20180413-Automobile_dependency_as_a_barrier_to_vision_zero_evidence_from_the_states.pdf
[3] Available at http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf
[4] https://www.yourcentralvalley.com/news/64-percent-of-fresnos-deadly-collisions-are-vehicle-vs-pedestrian-ones-police-say/
[5] Available at https://ncst.ucdavis.edu/project/cutting-greenhouse-gas-emissions-only-beginning-literature-review-co-benefits-reducing
[6] Available at https://www.fresno.gov/publicworks/wp-content/uploads/sites/17/2016/09/170022FresnoATPFinal012017.pdf

acknowledges generate significant truck and car traffic. Pedestrians and bicyclists are often vulnerable users of the transportation system. GCTC Report at 4-5. They operate within a system that has traditionally focused on the needs of motor vehicles weighing thousands of pounds, many of which are operated by drivers who are increasingly distracted by cell phones and unnecessarily complicated automotive infotainment systems. *Id.* This vulnerability will be exacerbated by the future warehouse (and other industrial facility) projects contemplated by the General Plan. For instance, a recently approved warehouse in the North Pointe Business Park in South Fresno will generate more than 3,000 vehicle trips a day, or 1.1 million trips a year. *See* Urban Crossroads, *Northpointe Building 31 Trip Generation and Impact Assessment* (November 2020) p. 4, Attachment 5. This is only one of several warehouses generating thousands of trips every day in South Fresno. In fact, the City has approved over more than at least 2.8 million square feet of warehouse development since the General Plan was approval and more than 5 million square feet since 2012. *See* Attorney General Letter to City's Director of Development and Resource Management, *Re: City of Fresno's South Industrial Priority Area Specific Plan* (August 2, 2019) at 10[7;] Footnote 48, p. 63. Pedestrians and cyclists forced to share the road with intensive truck and car traffic will be impacted by the air pollution, noise, and vibration generated by that traffic and the safety hazard of walking and biking on roads shared by trucks without sidewalks, crosswalks, speed bumps, or other protective measures.

Furthermore, the RPEIR incorrectly concludes that there are no feasible mitigation measures for reducing increased VMT impacts. The City cannot approve projects with significant environmental impacts if any feasible mitigation measure or alternative is available that will substantially reduce the project's effects. *See* Pub. Res. Code § 21002; CEQA Guidelines § 15126(a). Significant impacts must be mitigated when it is feasible to do so. Pub. Res. Code § 21002.1(b); *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 879. A feasible mitigation measure is one that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. Pub. Res. Code § 21061.1; CEQA Guidelines § 15364; *Covington* (2019) 43 Cal.App.5th at 878. The City's conclusion that there are no feasible mitigation measures for VMT impacts is without merit.

The City's determination that there are no feasible mitigation measures is based on the RPEIR's cursory observation that "mitigation would be limited to re-designating the affected arterials to a higher classification, creating a new General Plan LOS goal, widening the roads, or identifying the infeasibility of acquiring the affected right-of-way and implementing road widening." RPEIR at 4.16-41. However, the RPEIR fails to conduct the required feasibility analysis. *See* Pub. Res. Code § 21061.1; CEQA Guidelines § 15364. In fact, there are potentially feasible mitigation measures here. For instance, the California Air Resources Board has made many suggestions for mitigating VMT impacts—such as providing more public transportation options and investing in disadvantaged communities.[8] [9] Similarly, the Governor's Office of Planning and Research has found that "data from the past two decades shows that

C1-11 cont.

[7] Available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/comments-fresno-south-industrial-priority-area-specific-plan-08-02-2019.pdf.

[8] CARB 2017 Scoping Plan Identified VMT Reductions and Relation to State Climate Goals (January 2019), https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf.

[9] CARB Staff Presentation, Interface Between Air Quality, Climate Change, and Transportation (June 27, 2018), https://ww3.arb.ca.gov/board/books/2018/062718/carbstaffpres.pdf?_ga=2.203024280.884607571.1530222910-1119340360.1463155559.

economic growth is possible without a concomitant increase in VMT." *See* OPR, *Technical Advisory,* at 3. The RPEIR inexplicably disregards these potentially feasible mitigation measures to reduce significant VMT impacts on pedestrians, cyclists, and public transit users.

It is critically important that the potential safety impacts associated with continued implementation of the Fresno General Plan be adequately addressed. GCTC Report at 7. As currently presented, that is not the case. *Id.* The RPEIR should consider, at a minimum, the following potentially feasible mitigation measures:

- Rezoning industrial zoned land on streets where residences are located and on routes to schools to reduce truck traffic;
- Investing in sidewalks, streetlights, crosswalks, transit stops, bicycle lanes, speed bumps and other pedestrian safety infrastructure on heavily travelled routes. (Active transportation infrastructure should be on both sides of the street, not just the side of development projects, which is all the City currently requires.)

C1-11 cont.

IV. The RPEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts

The City of Fresno and the surrounding San Joaquin Valley Air Basin suffer from some of the nation's worst air pollution. In its 2020 State of the Air Report, the American Lung Association graded the Fresno-Madera-Hanford Metropolitan Area as the city with the worst short-term air pollution (24-hour PM2.5) the nation. pp. 8, 20. The State of the Air Report also ranked the Fresno Metropolitan area the second worst city for annual particle pollution and the fourth most ozone polluted city.[10] ALA, State of the Air Report, pp. 9, 21, 22. All Fresno residents are impacted by the region's poor air quality, but vulnerable populations, including people of color, low-income residents, children, and people with underlying health conditions, face heightened health risks. *Id.* pp. 20, 21, 37, 66. And South Fresno neighborhoods, where the General Plan concentrates industrial and warehouse land uses, are disproportionately exposed to concentrated air emissions generated by these facilities.

C1-12

It is therefore imperative that the RPEIR provide an accurate assessment of the Project's potential to further degrade air quality and the impact of air emissions on vulnerable residents and identify and adopt all feasible mitigation measures to minimize those impacts. Nevertheless, the RPEIR omits critical information that is necessary to allow the public and decision-makers to understand the nature or magnitude of its impacts and fails to identify enforceable mitigation measures to reduce those impacts.

1. The RPEIR Fails to Adequately Describe the Existing Setting by Failing to Acknowledge the Location of Existing Sensitive Receptors and Their Vulnerability to Air Pollution Exposure

C1-13

The General Plan designates approximately 5,000 acres of land in Southwest, South Central, and South East Fresno for industrial and warehouse development, including land currently occupied by residences and places of worship and on land surrounding schools and

[10] Available at http://www.stateoftheair.org/assets/SOTA-2020.pdf, access on May 6, 2021.

other sensitive receptors. The Plan also allows excessive vehicle traffic serving this planned industrial and warehouse development to use roadways, such as East Central Avenue and Jensen Avenue, which are lined with occupied housing. Despite the General Plan's policies to encircle and replace neighborhoods with development responsible for significant quantities of criteria and toxic air pollutants, the RPEIR includes no description about the location of existing sensitive receptors which may be exposed to air pollution as a result of the Project. In fact, the RPEIR's discussion of sensitive receptors is limited to a definition of the term "sensitive receptors" and the acknowledgement that "There are many sensitive receptors throughout the city of Fresno." RPEIR, p. 4.3-8.

This omission renders the EIR inadequate. An EIR's description of the environmental setting must be contain sufficient information to "permit the significant effects of the project to be considered in the full environmental context." CEQA Guidelines, § 15125(c). "If the description of the environmental setting 'is inaccurate, incomplete or misleading, the EIR does not comply with CEQA.'" *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 439. An accurate description of the environmental setting is critical, because the significance of an activity may vary with the setting. CEQA Guidelines, § 15064(b). A "project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant." *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718, 721; CEQA Guidelines, § 15300.2(a)). The RPEIR should identify the location of sensitive receptors in relation to areas designated for industrial and warehouse development and other land uses which may be expected to generate substantial quantities of toxic air contaminants as well as to roadways expected to experience high volumes of diesel truck traffic and car traffic as a result of General Plan implementation. The existence of entire communities on land planned or surrounded by land designated for industrial development is a component of the environmental context which the RPEIR must consider for the public and decision-makers to fully understand the nature and scope of the Project's impact on air quality, public health, other environmental impacts.

C1-13 cont.

The RPEIR's failure to include information about the environmental setting in communities vulnerable to the General Plan's industrial development plans also prevents the RPEIR from making accurate determinations about the significance of project-related air emissions and exposure of sensitive populations to toxic air contaminants. "[A]n EIR's designation of a particular adverse environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect." *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 514. Here, the RPEIR cannot accurately assess the nature and magnitude of the impact of exposure of sensitive receptors to air emissions without information about existing air pollution levels in vulnerable communities, health factors impacting susceptibility to adverse outcomes due to air pollution exposure, or the location of sensitive receptors.

Although the RPEIR does not disclose it, many South Fresno neighborhoods, including in the South Industrial Priority Area, are heavily impacted by emissions from existing industrial uses, warehouse distribution centers, freeway traffic, fueling stations, and the use of local roadways for heavy diesel truck traffic. These neighborhoods include neighborhoods in Southwest Fresno, South Central Fresno, Calwa, the community located along Drummond and Jensen Avenues, and Southeast Fresno. These and other South Fresno neighborhoods rank among the most pollution burdened in the state according to the California Communities Environmental Health Screening Tool (CalEnviroScreen), 3.0., a tool created by the California

EPA to identify communities by census tract which are disproportionately burdened by and vulnerable to multiple sources of pollution.[11] See Attachment 6, Fresno CalEnviroScreen Results[12]; Attachment 7, CalEnviroScreen 3.0 Excell Results (Abridged)[13]. To rank neighborhoods across the state, CalEnviroScreen 3.0 uses pollution burden and population characteristic indicators. The CalEnviroScreen pollution burden indicators include air pollution exposure indicators for ozone, PM2.5, Diesel, Particulate Matter, pesticide use, toxic releases from facilities, and traffic density.[14] [15]

Ten of the twenty highest ranked census tracts in the state under CalEnviroScreen are located in South Fresno neighborhoods. See Attachment C. Census Tract 601900100 ranks as the most pollution-burdened census tract and encompasses portions of South Central, Southwest, and Southeast Fresno, including the Orange Center Elementary School. In terms of air pollution exposure, Census Tract 601901100 in the 93706 zip code ranks in the 98th percentile for ozone, 97th percentile for toxic releases from facilities, 97th percentile for PM2.5, and 95th percentile for diesel. Census Tract 6019001500, located in the 93725 zip code and which includes incorporated and unincorporated residential neighborhoods in South Central and Southeast Fresno, is listed as the third most pollution burdened neighborhood in the state, ranks as the fifth most pollution burdened census tract and ranks in the 98th percentile for ozone, 98th percentile for toxic releases, 97th percentile for PM2.5, and 95th percentile for pesticides. As another example, Census Tract 601901000 in the 93706 zip code ranks as the eighth most pollution burdened census tract in the state and in the 99th percentile for ozone and toxic releases, 97th percentile for PM2.5, and 96th percentile for diesel and traffic.

These same census tracts, census tracts 601901100, 6019001500, and 601901000, and other top-ranking census tracts in South Fresno, score among the highest in the state for the CalEnviroScreen population indicators for asthma, low-birth weight, and cardiovascular disease.[16] Air pollution exposure is a known cause and contributor to these health issues, and those health issues render individuals even more vulnerable to further health impacts from pollution. See Attachment XX; Update to the California Communities Environmental Health Screening Tool, CalEnviroScreen 3.0 Report, January 2017, pp. 6-7, 11, 27, 33, 60. [17] Therefore,

C1-13 cont.

[11] CalEPA's Office of Environmental Health Hazard Assessment (OEHHA)'s webpage on CalEnviroScreen, 3.0 is accessible at this link: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

[12] Downloaded from the California Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 website at https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30 on May 10, 2020

[13] Downloaded from the California Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 website at https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30 on May 10, 2020.

[14] See OEHHA's CalEnviroScreen 3.0 "Pollution Indicators" webpage, accessible at https://oehha.ca.gov/calenviroscreen/pollution-indicators

[15] The City could also use data from the U.S. EPA's National Air Toxic Assessment which includes data on ambient pollution concentrations, exposures, and health risks for every census tract in the U.S., to illustrate relevant characteristics of the environmental setting.

[16] Census Tract 6019001100 ranks in the 97th percentile for asthma, the 93rd percentile for low-birth weight (LBW), and the 96th percentile for cardiovascular diseases. Census Tract 6019001000 ranks in the 98th percentile for asthma, 80th percentile for LBW, and 97th percentile for cardiovascular disease. Census Tract 6019001000 ranks in the 99th percentile for asthma, the 97th percentile for LBW, and the 91st percentile for cardiovascular disease. See Attachment C.

[17] Available at https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf.

the RPEIR must disclose these existing sensitive receptors and their vulnerability to air pollution exposures. C1-13 cont.

2. The RPEIR Fails to Accurately Describe Potential Inconsistencies Between the Project and Applicable Air Quality Plans

CEQA requires EIRs to discuss any inconsistencies between the proposed project and applicable air quality plans. *See* CEQA Guidelines § 15125(d). Here, the RPEIR fails to discuss the inconsistencies between the General Plan's implementation and South Central Fresno's Community Emissions Reduction Plan under AB 617 (C. Garcia, Stats. 2017). C1-14

3. The RPEIR Fails to Describe the General Plan Implementation's Inconsistencies with South Central Fresno's AB 617 Community Emissions Reduction Plan

In 2018, the California Air Resources Board (CARB) selected the South Central Fresno community, as described in the RPEIR, for the development of a Community Air Monitoring Plan and Community Emissions Reduction Program (CERP) pursuant to AB 617. AB 617 requires CERPs to reduce cumulative air pollution in disadvantaged communities such as South Central Fresno. Health & Safety Code § 44391.2 (c)(2). South Central Fresno was selected in recognition of its high cumulative air pollution exposure burden, significant number of sensitive receptors, and census tracts which have been designated as disadvantaged communities. After substantial work to develop a plan to reduce emissions in South Central Fresno by community members and Air District staff, in September 2019 CARB approved the CERP under AB 617[18]. The CERP recognizes that the majority of air pollution emissions in South Central Fresno come from mobile and industrial sources. p. 69. As described by CARB, the CERP "focuses on reducing exposure to fine particulate matter (PM2.5), toxic air contaminants (TAC), as well as oxides of nitrogen (NOx). [19]

The CERP is unequivocal that its purpose is to reduce pollution in the designated south Fresno area. While the San Joaquin Valley Air Pollution Control District ("Air District") leads CERP implementation, the City has a critical role in supporting CERP implementation and emission reduction. Several policies and commitments in the CERP implicate the City of Fresno's participation, yet none of these policies and commitments have made their way into either the General Plan or the RPEIR. Some of the relevant policies and commitments in the CERP that require municipal coordination include: C1-15

- HD.11: Heavy Duty Truck Rerouting

- C.5: Incentive Program for Educational Training for Electric Vehicle Mechanics

- LU.2: Provide Assistance During the California Environmental Quality Act

[18] The CERP is available on CARB's webpage at the following link: http://community.valleyair.org/media/1516/01finalscfresnocerp-9-19-19.pdf

[19] CARB, South Central Fresno webpage available at https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/communities/south-central-fresno, accessed on May 6, 2021.

Process

● LU.3: Provide Education and Outreach on Available Tools for Public Information Regrading Land Use Projects

● LU.4: Collaborating to Enhance Community Participation in Land Use Processes

● FD.2: Street Sweeping

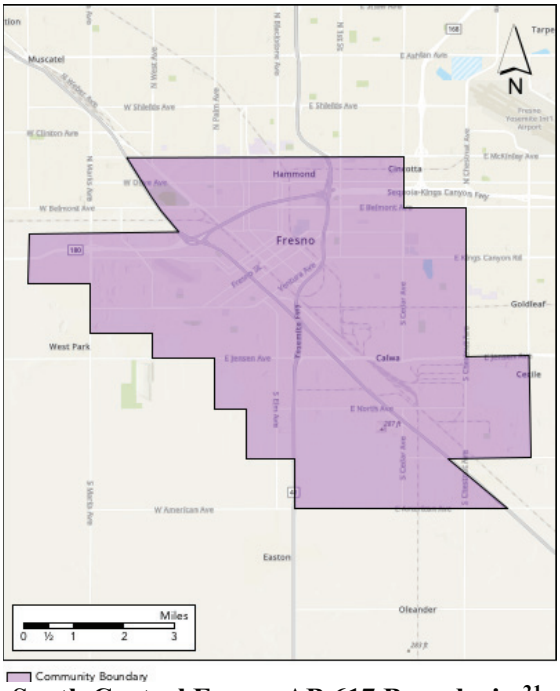
● Strengthened working relationship between the Air District and agencies that have land use and transportation authority in South Central Fresno, including development of a Memorandum of Understanding or other appropriate mechanisms for coordination.

C1-15 cont.

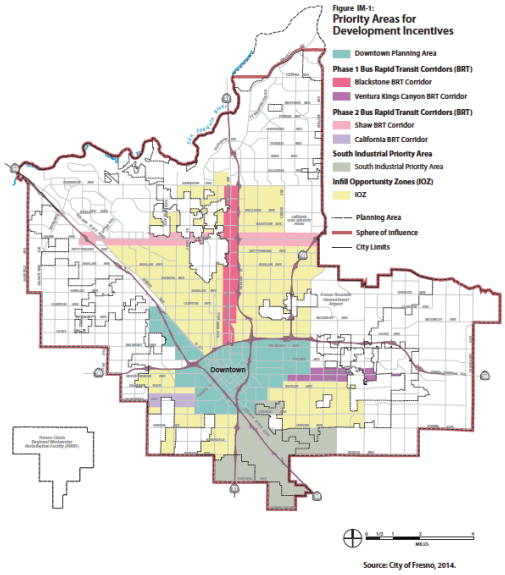
And the Response to Comments also declines, for example, to consider suggestions from the Air District that revisions be made to the General Plan to discuss a heavy-duty truck rerouting study from the adopted CERP, noting that "approved General Plan at this time are limited to specific changes related to VMT and compliance with recent legislative updates." Response to Comments, p. 3-55.

The RPEIR concludes that the Project is consistent with the CERP, because many of the CERP's policies require implementation by the Air District or CARB and because the General Plan contains policies supporting mixed-use development and multi-modal transportation. Yet the RPEIR's analysis fails to acknowledge or discuss the General Plan's South Industrial Priority Area, which designates roughly 5,000 acres of land for heavy industrial use in an area that falls within the AB 617 South Fresno community boundaries. General Plan, pp. 2-13, 12-26, Figure IM-1; See Draft South Industrial Priority Area Specific Plan, March 2019, p. 7[20]. We have provided below copies of the South Central Fresno Community AB 617 Boundaries, as they appear on CARB's South Central Fresno webpage; the SIPA boundaries as displayed in General Plan Firgure IM-1, "Priority Areas for Development Incentives," and an overlay of these boundaries which we created.

[20] Available at the City of Fresno's website at https://www.fresno.gov/darm/wp-content/uploads/sites/10/2019/05/SIPA_doc_v4-pressready-1.pdf

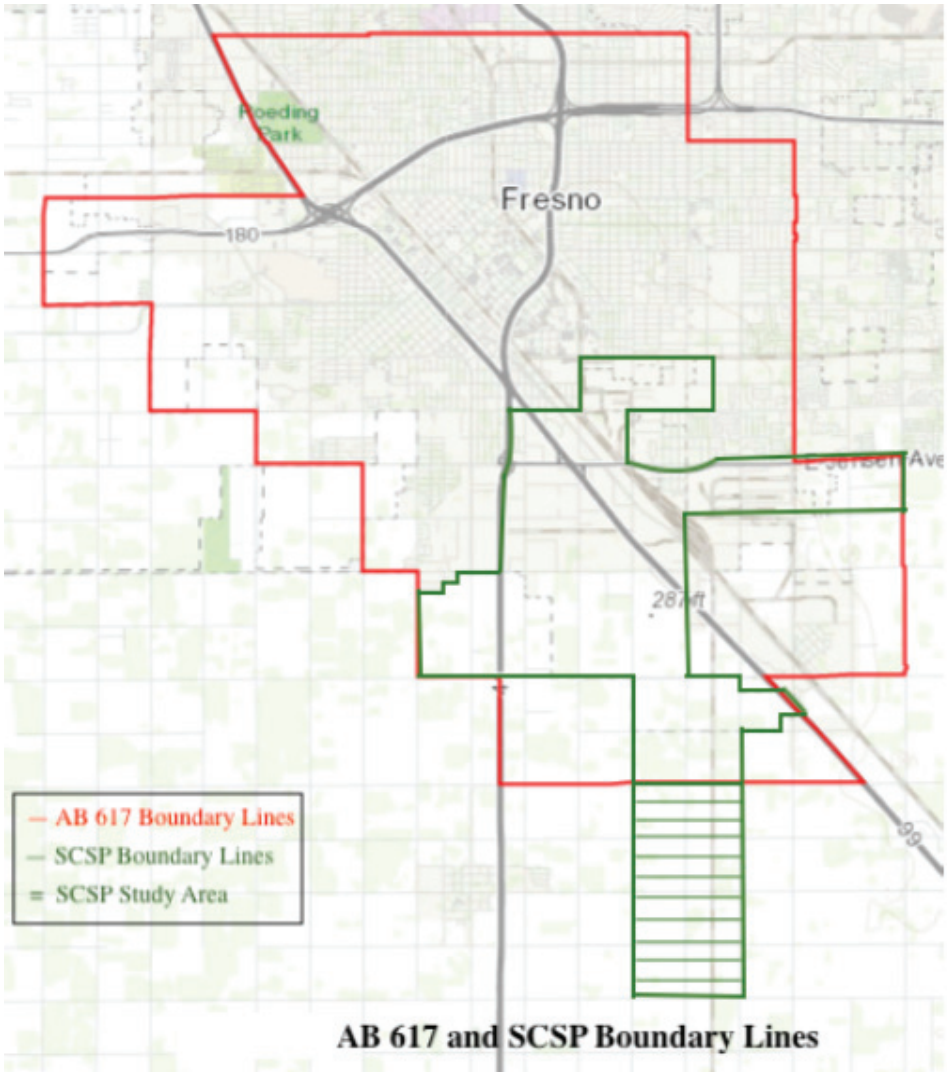


South Central Fresno AB 617 Boundaries[21]



General Plan South Industrial Priority Area
(SIPA designated in grey) (General Plan, Figure IM-1)

[21] South Central Fresno AB 617 Boundaries figure copied from CARB's South Central Fresno webpage at https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/communities/south-central-fresno



AB 617 and SCSP Boundary Lines

The RPEIR also fails to disclose General Plan policies intended to promote and expedite industrial business expansion in this and other industrial-designated areas within the General Plan Sphere of Influence. *See* General Plan, pp. 2-13, 14, 22 (Policy ED-1-j, describing permit streamlining and industrial development incentive programs); 12-24 (Policy ED-3-b, providing for targeted marketing efforts to support industrial business expansion; Policy ED-3-c, requiring the development of incentives to attract targeted industries). The General Plan's emphasis on industrial business expansion in the heart of the AB 617 South Central Fresno community, through Plan's land use designations and policies, is antithetical to the CERP's statutory mandate to reduce air emissions exposures by sensitive receptors within that area.

In addition, General Plan and Development Code policies that prioritize and facilitate the streamlined approval of industrial development with little or no public process conflicts with CERP provisions calling for City and Air District collaboration to deepen community

C1-15 cont.

engagement in land use decision-making. CERP Policy LU.4 identifies "[e]nsuring more comprehensive opportunities for public input on land-use decisions," "[p]roviding additional public access and education regarding permitting and CEQA processes," and "[b]etter communicating and understanding air quality impacts and potential mitigation" as strategies to pursue to this end. CERP, p. 94. In contrast, the first of the General Plan's 17 goals includes the use of land use and Development Code policies to "streamline permit approval" to stimulate economic development. General Plan, p. 1-5. Goal 13 calls for "efficient processing and permit streamlining." *Id.*, p. 1-7. This potential for exclusion of community engagement in land use decision-making runs afoul of AB 617 and the state-approved CERP.

The Development Code implements the General Plan's development streamlining goals by designating numerous land uses, including a wide range of industrial land uses[22], for ministerial approval, wherein CEQA does not apply and the City must issue permits for the project upon demonstration of compliance with objective design standards and application procedures. Fresno Municipal Code (FMC) § 15-4907, Table 15-4907. The Code provides for no public notice to potentially impacted residents or other members of the public and no public hearing. Development Permit and Conditional Use Permits, which do trigger CEQA review, also may be unilaterally approved by the planning director with no public hearing and the Code does not require any public notice for Development Permit issuance.[23] *Id.* Based on these Development Code procedures, the City has approved millions of square feet of industrial and warehouse development in South Central Fresno since the Code's approval without any advance public notice to or input from surrounding community members.

Thus, the RPEIR fails to discuss the clear inconsistencies of the City of Fresno General Plan and Development Code provisions with the CERP. This violates CEQA. *See* CEQA Guidelines § 15125(d).

C1-15 cont.

4. The RPEIR Relies on Tenuous Reasoning to Arrive at its Conclusion That the Project is Consistent with Air District Attainment Plans

The RPEIR uses two tests to determine if the project would create a potentially significant impact by conflicting with or obstructing applicable air quality plans (AQPs or attainment plans). Pursuant to the first test, if development proposed by the approved General Plan exceeds the growth projections used in an applicable attainment plan, it would produce a potentially significant impact. The RPEIR determines that the project would not result in a potentially significant impact under this test, because "the growth projections used for the approved General Plan assume that growth in population, vehicle use and other source categories

C1-16

[22]The FMC permits warehouses, freight/truck terminals, and research and development land uses by right in the Heavy Industrial, Light Industrial, Regional Business Park, and Business Park zone districts. FMC, § 15-1302, Table 15-1302. In the Light and Heavy Industrial zone districts land uses permitted by right include, among other things, "agricultural processing" and "General Industrial" land uses, which the Code states includes "operations such as food and beverage processing...; production apparel manufacturing; photographic processing plants; leather and allied product manufacturing; wood product manufacturing; paper manufacturing; plastics and rubber products manufacturing; nonmetallic mineral product manufacturing; primary metal manufacturing; fabricated metal product manufacturing; and automotive and heavy equipment manufacturing." FMC §§ 15-6705, 6707.

[23] Individuals may issue a written request for notice in advance of the approval of a Development Permit or Conditional Use Permit in order to receive notice of the director's approval of such requests. After receiving notice of permit approval, individuals have the option to file an appeal of the decision within fifteen days. FMC § 15-5017.

will occur at historically robust rates that are consistent with the rates used to develop the SJVAPCD's attainment plans." However, several attainment plans listed in the RPEIR – the 2013 Plan for the Revoked 1-Hour Ozone Standard, the 2007 PM10 Maintenance Plan, and the 2004 Revision to the California State Implementation Plan for Carbon Monoxide – were adopted prior to the General Plan's approval in December 2014. The RPEIR's reasoning therefore raises the question of how attainment plans adopted prior to the 2014 General Plan would have taken into account the General Plan's growth projections used for the adopted General Plan. Even if population growth and residential vehicle use projections remained the same for the same for the 2014 General Plans and previous City of Fresno General Plans, those projections would not account for land use and policy changes included in the 2014 General Plan which significantly influence the nature and air impacts of growth.

C1-16 cont.

Given the Fresno's notoriously poor air quality, its non-attainment status for several criteria air pollutants, and the health consequences for residents, it is imperative that the RPEIR's discussion of the bases on which it reached its determination that the General Plan is consistent with applicable AQPs is both accurate and transparent. The City must revise the RPEIR to clarify the basis for its determination.

5. The RPEIR's Analysis of Project-Related Criteria Air Pollutants Omits Critical Information and Relies on Unsound Reasoning

The RPEIR's analysis of the impacts of criteria air pollutant that will result from the Project does not allow the public and decision-makers to understand the nature and magnitude of the criteria air pollutants that will result from the Project, because it omits critical information and fails to demonstrate that its conclusions are supported by sound reasoning and evidence. An adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR. *Sierra Club v. Fresno County* (2018) 6th Cal.5th 502, 514.The RPEIR must be revised to include an accurate and complete analysis of the project's CAPs and their impacts and to include appropriate mitigation measures to address those impacts.

First, the RPEIR emphasizes that individual projects that occur as a result of the General Plan and that exceed thresholds of significance will be required to adopt mitigation measures that reduce impacts to less than significance or the City would be required to adopt an EIR. RPEIR, 4.3-54. But this statement is inaccurate, because, as mentioned above, under the Development Code dozens of individual project types are permitted by right without further CEQA review or mitigation, including industrial and warehouse projects which are significant emissions sources. Thus, the RPEIR violates CEQA by overstating the degree of mitigation and misrepresenting the magnitude of the adverse impacts from criteria air emissions that will occur as a result of General Plan implementation. *See Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 514.

C1-17

Second, the RPEIR uses circular and faulty reasoning to support its conclusion that criteria air emissions from construction will not violate Air District attainment plans. In the same way that the RPEIR claims that General Plan growth projects are consistent with AQPs, the RPEIR also claims that emissions related to construction activities are included in emissions forecasts in attainment plans and would therefore not interfere with or obstruct attainment plans. RPEIR, p. 4.3-54. As discussed above, however, several AQPs were adopted before the adoption of the General Plan. The RPEIR does not disclose how construction emissions forecasts for the 2014 General Plan could be accounted for attainment plans adopted before 2014.

Third, the RPEIR fails to support its conclusion that the project's stationary source emissions may be expected to be less than significant. The RPEIR's analysis references emissions from the City's top-three stationary source emitters but does not connect those emissions to a broader analysis of stationary source emissions which may occur as a result of entirety of General Plan implementation. Nor does the RPEIR include any other discussion of the nature or magnitude of stationary source emissions which may occur. However, General Plan implementation represents the potential for extensive new stationary source development, with the General Plan's designation of roughly 5,000 acres of industrial-zoned land in South Central Fresno, and Development Code rules allowing for the streamlined development of numerous stationary sources on a by right basis or otherwise limited process.

In finding stationary source emissions to be less than significant, the RPEIR argues that the Air District regulatory system will result in "continued reductions in stationary source emissions including the continued implementation of the approved General Plan." RPEIR, p. 4.3-57. The RPEIR is not explicit as to whether it anticipates ongoing reductions in stationary source emissions only at the individual project level or whether this expectation extends to the entire air basin, or why such an expectation would be warranted. Even if the RPEIR is correct that Air District rules will ensure ongoing reduction in emissions, the RPEIR does not identify "ongoing emissions reductions" as a threshold for significance and the RPEIR's assertion that ongoing emissions reductions will occur does not justify the finding that stationary source emissions for this Project are less than significant. Accordingly, the RPEIR lacks substantial evidence to support its determination that stationary-source criteria emissions are less than significant, and the RPEIR must be revised. *See California Oak Federation v. Regents Univ. of California* (2010) 188 Cal.App.4th 227, 261-232; CEQA Guidelines § 15384(a).

C1-17 cont.

6. The RPEIR's Determination That Construction-Related Fugitive Dust Emissions Are Less Than Significant Lacks Substantial Evidence

The RPEIR relies heavily on Air District rules and regulations, especially Regulation VIII, to support its conclusion that construction-related fugitive dust impacts are less than significant. RPEIR, p. 4.3-53. In doing so, the RPEIR misrepresents the Air District's assessment of the adequacy of Regulation VIII as a CEQA mitigation measure. The RPEIR reads, "The GAMAQI," the Air District's Guidance for Assessing and Mitigation Air Quality Impacts, "states that compliance with Regulation VIII will normally reduce impacts from fugitive dust to less than significant." RPEIR, p. 4.3-53. Yet the GAMAQI actually states:

C1-18

> "although compliance with District Regulation VIII substantially reduces project specific fugitive dust emissions, it may not be sufficient to reduce project specific emissions to less than significant levels. Furthermore, District Regulation VIII does not reduce construction exhaust emissions." p. 78[24].

The RPEIR also states that the Air District may "require" the application of certain enhanced control measures to projects which merit them due to their size or proximity to sensitive receptors. Again, the RPEIR's choice of words is misleading. The GAMAQI in fact says that

[24] The GAMAQI is available on the Air District's website at the following link: http://www.valleyair.org/transportation/GAMAQI.pdf, accessed on May 10, 2020

District may "recommend" such measures "when conditions warrant," indicating that a project's adoption of such measures is not a requirement but an option. p. 119. A review of Regulation VIII, including Rule 8011 (General Requirements)[25] and Rule 8021 (Construction, Demolition, Excavation, and Other Earthmoving Activities)[26], does not reveal any process for the provision or imposition of enhanced control measures by the Air District nor otherwise mention the topic.

The RPEIR attempts to further emphasize the comprehensive protection against construction-related fugitive dust emissions afforded by Regulation VIII, noting that "[if] measures included in the Dust Control Plan prove inadequate to control fugitive dust, construction contractors must implement additional controls or cease dust generation construction activities." RPEIR, p. 4.3-53. Yet Regulation VIII does not establish any triggering event for a review of the adequacy of fugitive dust control or other oversight mechanism that would ensure compliance.

General Plan implementation to date has shown that fugitive dust impacts as a result of construction are in fact significant, and in the case of warehouse development near sensitive receptors, severe despite Regulation VIII and other Air District rules and regulations. Since the General Plan was adopted, several concrete warehouse buildings, including an Amazon distribution center in 2016, have been constructed in and around the North Pointe Business Park located on South North Pointe Drive. The round-the-clock months-long construction of these buildings resulted in the generation of plumes of dust from the project site which coated nearby residences on East Central Avenue. Residents, including members of South Fresno Community Alliance, a signatory to this letter, were forced to keep their windows shut to reduce the infiltration of dust into their homes during this time. Even with such preventative measures, residents reported that dust accumulated inside their homes as well as adverse health impacts from dust inhalation, including allergies and asthma. See Attachment 8, South Central Neighbors United v. City of Fresno, et al., Petition for Writ of Mandate and Complaint for Injunctive Relief, p. 7, lns. 21-23. Continued build out of vacant industrial-zoned sites in this area may be expected to result in similar significant impacts on nearby residences and community-members in the absence of suitable mitigation.

Simply put, by relying on Regulation VIII and other Air District rules, the RPEIR fails to support its conclusion that fugitive dust emissions are less than significant with substantial evidence and overlooks information provided to the City about the serious impacts that General Plan buildout has resulted in to date.

C1-18 cont.

7. The RPEIR's Analysis or Mitigation of the Health Impacts Associated with the Project's Air Emissions Falls Short of CEQA's Requirements

The RPEIR acknowledges that high-volume roadways, stationary diesel engines, and. "facilities attracting heavy and constant diesel vehicle traffic," including distribution centers and trucks stops, have been identified by CARB as "posing the highest risk to adjacent receptors." RPEIR, 4.3-16. The RPEIR also states that other facilities with increased risk include warehouse distribution centers and large industrial facilities and that "most diesel particulate matter," a carcinogen, "is emitted from mobile sources" including construction and agricultural equipment, truck-mounted refrigeration units, and "trucks and buses traveling on freeways and

C1-19

[25] Available on the Air District's website at https://www.valleyair.org/rules/currntrules/r8011.pdf

[26] Available on the Air District's website at http://www.sjvapcd.dst.ca.us/rules/currntrules/r8021.pdf

local roadways." *Id*. Despite these recognitions, the RPEIR fails to even acknowledge or analyze the impacts of the Project's land use and transportation policies which concentrate industrial and warehouse distribution facilities and generate voluminous diesel truck traffic in some of the most vulnerable communities in Fresno County and the state.

In addition, the RPEIR omits information necessary for a complete and accurate understanding by the public and decision-makers understanding of the Project's air emissions-related health impacts. The RPEIR must be revised to address these flaws.

C1-19 cont.

8. The RPEIR Fails to Use Available Information to Analyze Potential Health Impacts as a Result of Criteria Air Pollutants

The RPEIR briefly acknowledges three groups of people as sensitive to air pollution: children, the elderly, and persons with pre-existing respiratory or cardiovascular illness." Research shows that other population characteristics, including lower educational attainment levels, linguistic isolation, housing-cost burden level, poverty and identification as a person of color, are associated with heightened vulnerability to health impacts from air pollution. *See* CalEPA's Update to the California Communities Environmental Health Screening Tool, CalEnviroScreen, 3.0, January 2017, pp. 12,9 American Lung Association, 2020 State of the Air Report, pp. 20, 21, 37, 66. Many neighborhoods in Fresno, and in South Fresno in particular, rank highly for the percentage of the population the falls into these categories of vulnerability pursuant to the California EPA's CalEnviroScreen, 3.0 tool. To provide a complete analysis, the RPEIR should be revised to consider the health impacts of Project air emissions on this broader range of vulnerable populations.

The Air District's comments on the DPEIR implored the City to include a discussion of how the General Plan "will endeavour to conform to the Court's holding" in S*ierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (Friant Ranch), where the California Supreme Court held that an EIR's overly general discussion of adverse health impacts from air pollution failed to comply with CEQA. Response to Comments B3-5. Despite the Air District's comments, the RPEIR makes no attempt to correlate the project's anticipated emissions of criteria air pollutants and human health. Rather, it claims that an analysis of the correlation between a project's anticipated criteria air pollutants on human health is not possible, relying on statements contained in a 2015 Amicus Curiae brief by the Air District in *Sierra Club, et al. v. Fresno County, et al.* that "currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts." RPEIR, 4.3, 57, 58. Yet, the project studied by the RPEIR is not an individual development project but rather a plan-level project encompassing all development within the General Plan Planning Area through buildout in 2056. The RPEIR's use of project-level significance thresholds for CAPs is not an adequate basis for the RPEIR to fail to assess health impacts associated with the Project's criteria air pollutants.

C1-20

The RPEIR's analysis of the health impacts associated with criteria air emissions focuses in significant part on the RPEIR's claims that Project emissions are not high enough to use regional modeling to correlate health effects on a Basin-wide level. RPEIR, p. 4.3-58, 59. It also emphasizes that that "emissions of NOx, VOCs, and ozone... have been trending downward" within the San Joaquin Valley Air Basin. RPEIR, p. 4.3-58. Yet in focusing on modeling deficiencies at the regional level and regional level trends, the RPEIR completely ignores abundant research associating serious localized health impacts with concentrated air pollutant

exposures. The Office of Planning and Research recommends that "[l]ocal governments should . . . consider localized air pollution resulting from the concentration of various stationary sources in disadvantaged communities, such as freight-handling facilities, manufacturing facilities or other industrial air pollution sources." State of California 2017 General Plan Guidelines, p. 16.[27] The California Air Resources Board's "Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways," (CARB Technical Advisory) states that studies show that sensitive populations can experience serious health impacts, including worsening of asthma and cardiovascular disease and adverse birth outcomes because of exposure to traffic-related air pollution.[28] The advisory also states that studies "show that poor and minority communities are more likely to live near busy roadways, and therefore may be more at-risk for the health effects related to exposure to traffic emissions." p. 3. Here, the General Plan's land use designations providing for the extensive co-location of new industrial development and warehouses with existing disadvantaged communities and the use of local roadways for high-volume truck and car traffic serving those projects indicate that the General Plan can be expected to result in significant adverse health impacts associated with localized project air emissions. The RPEIR improperly fails to evaluate these impacts.

The DPEIR also fails to include any discussion of the project's anticipate emissions of criteria air pollutants for which the Air District is currently in attainment, including lead, carbon monoxide, and sulfur dioxide. The City's Response to Comments justifies this exclusion on the basis that Project is "not expected to result in substantial changes to the levels of these pollutants." But this expectation is unsupported. Carbon monoxide is a primary emission from motor vehicles. CARB Technical Advisory, p. 3.

In addition, the DPEIR does not even provide any information about the quantity of ozone that may be expected to result from project implementation. As noted above, in recent case law, the Supreme Court held that inclusion of raw numbers estimating tons of ROG and NOx from a project alone do not provide meaningful information to a reader about how much ozone will be produced and whether that ozone will result in adverse health effects. *Sierra Club v. Fresno County* (2018) 6 Cal.5th 502, 520. The Air District's assertion in a legal brief in 2015 that it lacks models to assess CAP impacts from individual projects on human health does not justify the DPEIR's failure to make any attempt to conduct such an analysis. As the Supreme Court stated in Sierra Club, "technical perfection" or "scientific certainty" are not required of a DPEIR's analysis, but "adequacy, completeness, and a good-faith effort at full disclosure" is. *Sierra Club v. Fresno County* (2018) 6 Cal.5th 502, 515.

C1-20 cont.

9. The RPEIR Fails to Make a Good-Faith Effort to Analyze Health Risks Resulting from Sensitive Populations' Exposures to Toxic Air Contaminants

The RPEIR specifically identifies only four toxic air contaminants, namely, benzene, butadiene, formaldehyde, and hydrogen sulfide, and provides little information about their individual health impacts. However, the California EPA identifies several dozen TACs and

C1-21

[27] Available at https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf, accessed on May 6, 2021.

[28] Available at https://ww3.arb.ca.gov/ch/rd_technical_advisory_final.pdf, accessed on May 6, 2021.

provides extensive documentation regarding their unique health impacts.[29] The RPEIR cannot analyze the impacts of toxic air contaminants on sensitive receptors where it has not even identified the air pollutants at issue.

In addition, The DPEIR fails to include any meaningful analysis of potential exposure of sensitive receptors to TACs based on its assertion that it is not possible to calculate the risks, because the City cannot determine the amount of TACs that will be released. The RPEIR fails to make a good-faith effort to provide information that is available regarding potential exposures of sensitive receptors and possible health impacts given General Plan land use designations, land uses permitted within those designations and their potential TAC emissions, their proximity to sensitive receptors, and factors impacting sensitive receptor exposure in those locations. C1-21 cont.

The City must revise the RPEIR to correct these deficiencies and adopt adequate mitigation measures to address the exposure of sensitive populations to air pollution as identified in the revised DPEIR.

10. The RPEIR Fails to Identify Adequate Mitigation for the Project's Criteria Air Pollutants

The RPEIR finds that the Project will result in significant impacts associated with the release of criteria air pollutants. In response to these impacts, the RPEIR identifies two mitigation measures, AIR-2.1 and AIR-2.2. MM AIR-2.1 states:

> "If construction related air pollutants are determined to have the potential to exceed the SJVAPCD adopted threshold of significance, the Planning and Development Department shall require that applicants for new development projects incorporate mitigation measures into construction plans to reduce air pollutant emissions during construction activities" (p. 2-5)

MM AIR-2.2 states: C1-22

> "If operation-related air pollutants are determined to have the potential to exceed the SJVAPCD-adopted thresholds of significance, the Planning and Development Department shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities" (p. 2-6).

As designed, these measures will fail to meaningfully reduce project CAP impacts. First, AIR-2.1 and 2.2 only apply to projects which require discretionary review. Yet, as discussed above, the General Plan and Development Code establish by right permit issuance for numerous projects, including industrial and warehouse projects which the RPEIR acknowledges are associated with significant air emissions. AIR-2.1 and 2.2 will not apply to these projects. The Air District's comments on the DPEIR recognize this problem as well; the Air District recommended that the "the General Plan include language supported by policy requiring

[29] CalEPA's Office of Environmental Health Hazard Assessment provides a list of TACs and documents with information specific to each TAC on its website at the following link: https://oehha.ca.gov/air/general- info/toxic-air-contaminant-list-staff-reportsexecutive-summaries

[projects that do not require discretionary review] to prepare a technical assessment in consultation with the District, and recommending that a VERA be considered for development projects determined to have a significant impact on air quality." Response to Comments at B3-12. The City improperly refused to adopt this sensible recommendation. *See id.*

Second, the measures would unlawfully defer formulation of mitigation to future projects without incorporation of specific performance standards the mitigation will achieve. CEQA Guidelines § 15126.4(a)(1)(B). The City may not rely on mitigation measures AIR-2.1 and 2.2 as currently drafted.

The RPEIR is required to identify and consider all feasible mitigation. The City must revise the DPEIR to incorporate mitigation measures which apply to all projects (not only those subject to discretionary review) that contribute to the General Plan's significant CAP emissions impacts and identify enforceable and feasible mitigation at this time. Examples of feasible and effective mitigation measures include but are not limited to:

- the re-designation of industrial land uses near residential land uses, schools, and other sensitive receptors to less intensive and community-serving uses;
- amendment of the Development Code to incorporate enhanced protections for disadvantaged communities and vulnerable populations, including adopting Conditional Use Permit requirements for warehouse facilities and other land uses known for significant air quality impacts;
- heightened standards for acceptable impact levels for permit issuance; heightened performance standards; and specific penalties and enforcement measures to reduce air quality-related violations for projects which would have air quality impacts and are located in or near disadvantaged communities;
- the adoption, funding, and staffing of a program to conduct proactive code enforcement of air quality-related rules, regulations, and mitigation measures applicable to industrial facilities, warehouse and distribution centers, and other facilities which result in significant air impacts on sensitive receptors;
- the creation of a program to dedicate funds for enforcement of air quality-related rules and regulations to programs to reduce the impacts of air pollution exposure on vulnerable populations; and,
- commitments to take specific actions and work with the Air District to implement specific policies and measures contained in the South Fresno Community CERP.

C1-22 cont.

In addition, the Attorney General Xavier Becerra issued a guidance document titled, "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act."[30] The document identifies numerous mitigation measures applicable to air quality and other impacts of warehouse development which have been implemented in warehouse projects across the state and are recommended by the Attorney General's Office. These measures include but are not limited to the following mitigation for construction and operation impacts:

[30] Available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, accessed on May 7, 2021.

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.

C1-22 cont.

- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARBapproved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

C1-22 cont.

Given the increasing prevalence of warehouse development in Fresno, we recommend that the City review the mitigation measures contained in the document and incorporate them as appropriate into the RPEIR.

11. The RPEIR Erroneously Fails to Acknowledge or Analyze COVID-19 As Part of the Environmental Setting

Over the past year, the global COVID-19 pandemic has had a devastating toll on San Joaquin Valley and Fresno residents. Fresno County has registered over 100,000 COVID-19 cases and 1,680 deaths as a result of the pandemic.[31] Studies comparing excess deaths in 2020 versus prior years indicate that confirmed U.S. deaths due to the coronavirus are significantly lower than the actual death rate attributable to COVID-19.[32] In December 2020, ICUs of

C1-23

[31] See Fresno County, COVID-19 Data Hub, available at https://covid-19-cofgisonline.hub.arcgis.com/, access on May 6, 2021.

[32] CNBC, Official U.S. coronavirus death toll is "a substantial undercount' of actual tally, Yale study finds," July 1, 2020, available at https://www.cnbc.com/2020/07/01/official-us-coronavirus-death-toll-is-a-substantial-undercount-of-actual-tally-new-yale-study-finds.html, accessed on May 6, 2021

hospitals in the San Joaquin Valley region reached full capacity and zero available beds due to the prevalence of critically-ill COVID-19 patients.[33] COVID-19 has disproportionately infected and killed more Latino and disproportionately killed more Black people in the United States, and has disproportionately killed and infected Latinos in Fresno County. Fresno County COVID-19 Data and Surveillance Dashboard, Covid-19 Deaths Race-Ethnicity, and Cases by Race and Ethnicity; U.S. Center for Disease Control, COVID-19 Racial and Ethnic Health Disparities[34].

Numerous studies published over the past year have documented heightened susceptibility to COVID-19 and other viruses among people who experience greater air pollution exposures, including traffic-related air pollution. A study by researchers at the Harvard T.H Chan School of Public Health found that people who live in U.S. regions with high levels of PM2.5 are more likely to die from COVID-19 than people who live in less polluted regions.[35] Another study found that patients with severe COVID-19 infections requiring intensive care were twice as likely to have had pre-existing diseases, including heart diseases, stroke, chronic lung disease and diabetes, known to be caused by air pollution.[36] Multiple studies have found that living in communities with greater exposure to tailpipe emissions is associated with increased COVID-19 incidence and risk of dying from COVID.[37] Another study found positive associations between short-term PM2.5, PM10, CO, NO2, and O3 exposure with COVID-19 infection.[38] Studies have also found evidence from past outbreaks, including SARS and influenza, that breathing more polluted air increased risks of death.

As a result of vaccine access barriers and vaccine hesitancy, only 26.5% of residents have been fully vaccinated and just 28% of residents who live in the economically and socially disadvantaged South Fresno zip codes have received at least one does of COVID-19 vaccine.[39] Due to low demand for vaccine, Fresno County shipped about 28,000 vaccines to other counties

C1-23 cont.

[33] Los Angeles Times, "'I've seen people die.' COVID-19 slams Central Valley hospitals, as many resist lockdowns." December 13, 2020, available at https://www.latimes.com/california/story/2020-12-13/san-joaquin-valley-coronavirus-hospitals-many-resist-lockdown, access on May 6, 2021.

[34] Fresno County's COVID-19 Data and Surveillance Dashboard is accessible at https://covid-19-cofgisonline.hub.arcgis.com/. Accessed on May 10, 2021; the U.S. CDC's COVID-19 Racial and Ethnic Health Disparities webpage is located at the following link: https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/racial-ethnic-disparities/disparities-deaths.html

[35] Wu, X., et al. Air pollution and COVID-19 mortality in the United States: Strengths and limitations of an ecological regression analysis, *Science Advances,* Nov 4, 2020:
Vol. 6, no. 4., available at https://advances.sciencemag.org/content/6/45/eabd4049/tab-pdf

[36] Yang, J., et al. Prevalence of comorbidities and its effects in patients infected with SARS-CoV-2: a systematic review and meta-analysis, International Journal of Infectious Diseases 94 (2020) 91-95, available at https://www.ijidonline.com/article/S1201-9712(20)30136-3/pdf, accessed on May 6, 2021

[37] Liang, D. et al., Urban Air Pollution May Enhance COVID-19 Case Fatality and Mortality Rates in the United States, The Innovation, Sept. 21, 2020, available at https://www.cell.com/the-innovation/fulltext/S2666-6758(20)30050-3, accessed on May 6, 2021; Lipsitt, J., et al., Spatial analysis of COVID-19 and traffic-related air pollution in Los Angeles, Environment International, Vol. 153, August 2020, available at https://www.sciencedirect.com/science/article/pii/S0160412021001562#!, accessed on May 6, 2021

[38] Zhu, Y., et al. Association between short-term exposure to air pollution and COVID-19 infection: Evidence from China. Science of the Total Environment, Vol. 727, July 20, 2020, available at https://www.sciencedirect.com/science/article/abs/pii/S004896972032221X?via%3Dihub, accessed on May 6, 2021

[39] Fresno Bee, "See Fresno County vaccination rates by ZIP code. How does your neighborhood compare?," April 18, 2021, available at https://www.fresnobee.com/news/local/article250730119.html, accessed on May 6, 2021

and reduced the number of vaccines it ordered in April 2021.[40] In addition, recent uncontrolled COVID-19 outbreaks in India and other nations have led to the spread of dangerous virus variants. Experts expect that vaccine hesitancy and barriers, coupled with ongoing and accelerating outbreaks and the emergence of variants, is likely to prolong the pandemic.[41]

Despite the abundance of information available about the continued prevalence of COVID-19, the virus' grim impacts on people in Fresno, and the heightened susceptibility to COVID and other viruses caused by air pollution exposure, the RPEIR dismisses the relevance of COVID to its analysis. The RPEIR mischaracterizes the nature of the pandemic in relationship to the City's obligations under CEQA, stating that the pandemic "is an impact of the environment on the Project, which is not required to be addressed in a CEQA analysis." RPEIR, p. 1-3. The City is incorrect. The General Plan's impacts, including the nature and severity of its air quality impacts, are affected by and must be considered in light of research and other information demonstrating the heightened vulnerability of residents who are exposed to air pollution to viral illness, including COVID-19 and other viruses. In particular, the pandemic and potential for other viral outbreaks are relevant to the nature and severity of the General Plan's air quality impacts on human beings and must be acknowledged and incorporated into the RPEIR as a component of the environmental setting. CEQA Guidelines, § 15125(c) (requiring "the significant effects of the project to be considered in the full environmental context"); *Friends of the Eel River v. Sonoma County Water Agency* (2003), 108 Cal.App.4th 859, 874 (interpreting CEQA Guidelines § 15125 broadly to afford the fullest possible protection to the environment and ensure the accuracy of the EIR's environmental effects analysis). The disproportionate impacts of COVID-19 on people of color, and the disproportionate share of Latino and Black residents that live in South Fresno neighborhoods with heightened exposures to air pollution raise particular concerns as to the PEIR's failure to assess and mitigate air quality and health impacts, and failure to assess the disproportionate impacts of this failure on people of color, especially in the context of COVID-19.

C1-23 cont.

V. The RPEIR Fails to Adequately Analyze and Mitigate for the General Plan's Greenhouse Gas Emissions, and the Recirculated GHG Plan Cannot Qualify as a CEQA Streamlining Document

Reducing GHG emissions to minimize the harms from climate change is one of the most urgent challenges of our time. Scientific evidence continues to mount that we are not only facing a true climate crisis, but also rapidly running out of time to confront it. The City of Fresno and the surrounding region face mounting risks from climate change, including wildfire, precipitation extremes, and decreased water supply. GHG Plan at 2.7 to 2.8. Moreover, the effects of climate change in California and the San Joaquin Valley in particular – such as extreme heat events, flooding, and drought – disproportionately impact low-income communities and communities of color. See *The climate gap: environmental health and equity implications of climate change and mitigation policies in California-a review of the literature*, S. Shonkoff et al., Climatic Change (2011) at S485-86, Attachment 9; See Climate Change, Public Health, and Policy: A California

C1-24

[40] Fresno Bee, "'Demand isn't there.' As Fresno residents refuse vaccine, doeses shipped to other counties.' April 15, 2021, available at https://www.fresnobee.com/news/local/article250706119.html.

[41] New York Times, "India's outbreak is a danger to the world. Here's why. https://www.nytimes.com/2021/05/02/world/india-covid-variants.html

Case Study, C. Ganesh, *et al.* AJPH Policy (2017).. These communities often have more limited resources to access cooler and safer conditions during heat events and are more likely to suffer from chronic health conditions that heighten risk of death during heat waves and other extreme weather events. See Id. at S486-90. The residents of Fresno therefore have a direct and immediate interest in swift and decisive climate action at all levels of government. Further, the law is clear that lead agencies must thoroughly evaluate a project's impacts on climate change under CEQA, and identify and adopt feasible mitigation measures to address project-specific or cumulative impacts. *See Communities for a Better Env't v. City of Richmond* (2010) 184 Cal.App.4th 70, 89-91; CEQA Guidelines § 15064.4.

The City's preparation of the RPEIR and 2021 Recirculated GHG Plan ("GHG Plan"), included as Appendix G to the RPEIR, offered an important opportunity to aggressively reduce emissions, including from VMT, which contributes significantly to climate disruption in Fresno. GHG Plan at ii. Unfortunately, in preparing these recirculated documents, the City has yet again passed up the opportunity to do so. The RPEIR and 2021 GHG Plan suffer from the same defects as the PEIR and the 2020 GHG Plan before them.

The GHG Plan continues to rely largely on vague, nonbinding policies from the General Plan to reduce GHG emissions, and fails to provide data to support its conclusion that compliance with these policies would be sufficient to meet the state's GHG emission reduction mandates. Further, the GHG Plan applies such a vague approval process for a project to tier off of the GHG Plan that it provides no assurance that tiered projects will reliably reduce GHG emissions though project design. With these deficiencies, the GHG Plan cannot serve as a "qualified" climate action plan under CEQA Guidelines section 15183.5, i.e. one that can be used as a "threshold of significance" for evaluating the climate impacts of future discretionary projects.

C1-24 cont.

The RPEIR likewise relies on implementation of these same vague, optional General Plan policies to mitigate the impacts of greenhouse gas emissions from General Plan implementation. Finding that GHG emissions from implementation might nevertheless have potentially significant climate change impacts, the RPEIR asserts that these emissions can be mitigated to less than significant levels with a single mitigation measure: new development projects subject to discretionary review are to show consistency with the GHG Plan and implement applicable measures from the GHG Plan's CEQA Project Consistency Checklist. *See* Mitigation Measure GHG-1.1, RPEIR at 4.8-47. Efficacy of this measure is unsupported by substantial evidence and cannot be relied upon given the vague framework for project-level GHG reductions laid out in the GHG Plan. The RPEIR also lacks evidence to support its conclusion that the General Plan is consistent with applicable plans, policies, and regulations adopted to reduce GHG emissions. RPEIR at 4.8-47 to 49.

A. The City's Recirculated GHG Plan Fails to Ensure Reduction of GHG Emissions and Cannot be Relied on for Tiering under CEQA Guidelines § 15183.5

C1-25

Where a public agency's climate action plan meets the requirements in CEQA Guidelines section 15183.5, compliance with that plan may be used to mitigate cumulative levels of GHG emissions within a jurisdiction to a less-than-significant level and allows development project tiering from the plan. CEQA Guidelines § 15185.3. Such plans must do all of the following: (1) make an inventory of greenhouse gas emissions, both existing and projected over a specified

time period, resulting from activities within a defined geographic area; (2) set a reduction target, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; (3) forecast projected emissions for activities covered by the plan; (4) specify reduction measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the reduction target; and (5) establish a mechanism to monitor the plan's progress toward achieving reduction targets.

The City's GHG Plan fails to meet all of these requirements. In particular, it continues to omit 2050 as a target reduction year, which leaves the City without information on whether adequate reductions, under General Plan and other local policies, will be possible in later years. The Plan also lacks substantial evidence that its reduction measures, taken largely from the General Plan, are capable of achieving reduction targets. Further, it provides only vague direction for how a project tiering off of the GHG Plan would comply with the plan, undermining the GHG Plan's ability to ensure project-level emissions reduction.

C1-25 cont.

1. The Baseline Inventory of GHG Emissions Is Incomplete and Inaccurate

The baseline inventory of City GHG emissions is the foundation of the GHG Plan. Without a complete and accurate inventory, the City cannot accurately project future business-as-usual ("BAU") emissions or measure the effectiveness of reduction measures in meeting identified targets and goals. Effective policies cannot be built on a flawed inventory. Unfortunately, the City's GHG Plan inventory is incomplete and therefore inaccurate.

First, the GHG Plan omits a 1990 inventory of local emissions (GHG Plan at 3-2), even though compliance with AB 32 and California's 2017 Climate Change Scoping Plan require an 80 percent emissions reduction below 1990 levels by 2050. RPEIR at 4.8.50. Because the Plan omits a 1990 inventory, the City will not be able to establish whether it is on track to meet and ultimately does meet, this state-mandated target. The GHG Plan must be revised to include a 1990 emission inventory.

Second, in developing a 2010 inventory – which the GHG Plan uses to the exclusion of a 1990 inventory – the GHG Plan omits certain types of emissions without justification. For example, the GHG Plan states that it did not include emissions sources that comprise less than 3 percent of the emissions inventory. GHG Plan at 3-1. The GHG Plan gives no further details and no explanation or basis for this arbitrary omission.

C1-26

Similarly, the inventory specifically omits emissions from large industrial sources that are subject to California Air Resources Board's (CARB) reporting regulations and to Cap-and-Trade regulations. *Id.* In other words, only emissions from smaller sources are counted in the baseline inventory, while emissions from larger permitted sources are ignored. However, by subtracting permitted industrial emissions from the baseline inventory, the GHG Plan presents an inaccurate description of existing conditions. CEQA Guidelines § 15125(a).

The City's GHG Plan and PEIR fail to disclose these emissions, analyze their impacts, or identify feasible measures to ensure emission reductions over the life of the Plan. The result is a GHG Plan that presents flawed baseline data of GHG emissions that undermines the entire planning process. Without an accurate baseline inventory, the PEIR presents an inaccurate description of the existing setting and its projected future emissions have no evidentiary basis. Inasmuch as the City permits the activities resulting in emissions, the City has an obligation to

disclose these emissions. The failure to do so renders the GHG Plan fatally flawed. A revised Plan must correct this flaw and include a comprehensive inventory of all emissions. C1-26 cont.

2. The GHG Plan Must Include Substantial Evidence to Support Its BAU Scenarios and Further Explain Its 2020 Emissions Figures

The GHG Plan, as well as the RPEIR, use "Business-as-Usual" (BAU) scenarios as a starting point to calculate the City's projected GHG emissions in 2020, 2030, and 2035. GHG Plan at 3-4; RPEIR at 4.8-33. Yet those documents fail to explain how these BAU figures were calculated and what assumptions they rely on. While the GHG Plan notes that BAU emissions used "population, households, and employment growth rate from the Fresno County 2050 Growth Projections developed by Fresno County Council of Governments" (GHG Plan at 3-4), it does not disclose what methodology it used to arrive at the BAU figures, and whether, for example, the BAU numbers take into account the surge in warehouse development and associated truck trips allowed for under the City's General Plan. The GHG Plan and the RPEIR must be revised to include substantial evidence supporting its BAU calculations. C1-27

At the same time, it is unclear to what extent the GHG Plan's 2020 emissions figures represent an emissions inventory versus an emissions projections. *See* GHG Plan at 3-4. The City must revise the Plan to explain how it arrived at these 2020 figures, including whether those figures account for the dramatic increase in warehouse space and truck traffic in Fresno subsequent to adoption of the City's 2014 General Plan.

3. The GHG Plan's Emission Forecasts Should Extend to 2050

The GHG Plan states that the "approved General Plan and GHG Plan Update ensure that the City of Fresno will do its part of reducing GHG emissions for the short-term (2020) and the long term (2050)." GHG Plan at 1-9; *see also* RPEIR at 4.8-50. Yet the GHG Plan, as well as the RPEIR, forecast emissions only for the years 2020, 2030, and 2035. The forecast does not go to 2050. GHG Plan at i; RPEIR at 4.8-50. Although the GHG states that "[a] straight-line projection from the 2030 to 2050 goals would result in a reduction goal of 58 percent below baseline levels by 2035" (GHG Plan at 4-4) it is unclear how this figure was determined and the GHG Plan does not include 2050 in its emission forecast charts. (GHG Plan at 4-4, 4-33, 4-34).

The RPEIR asserts that a forecast farther into the future than 2035 is unnecessary. It states that "[a]lthough the General Plan growth rate would result in buildout by the year 2056, given current methods and the State's goals and targets, 2035 is a reasonable forecast for GHG and is in-line with the State emission reduction targets." RPEIR at 4.8-47. This approach is inadequate. First, the GHG Plan notes that one of the goals of converting the MEIR to a PEIR is to "extend[] the life of the Fresno General Plan and the accompanying environmental document by up to 10 years." GHG Plan at 1-2. To the extent that this means extending the lives of these documents 10 years past 2035, until 2045, a forecast farther into the future is essential to establish that the General Plan's policies are capable of reducing emissions in line with state mandates over the entire life of the General Plan. C1-28

Further, because buildout under the General Plan extends to 2056 (GHG Plan at 2-2; RPEIR at 4.8-47) the GHG Plan should have forecast emissions to implement the plan until at least 2050. As drafted, the document considers less than 20 years' worth of emissions. Twenty year is a small fraction of the time over which General Plan impacts will be felt, a Plan that sets

in place land use patterns leading to emissions for decades to come, long after 2035. In particular, the General Plan designated the South Industrial Priority Area, roughly 5,000 acres slated for heavy industrial use in South Fresno. General Plan, pp. 2-13, 12-26, Figure IM-1. Development within this industrial hub will be significant source of GHG emissions far into the future. Only projecting impacts until 2035 fails to provide the public with a meaningful assessment of the Project's long-term impacts. The GHG Plan should have accounted for, and the RPEIR should have analyzed, GHG emissions at least through the year 2050. Only then could the RPEIR analysis determine if implementation of the General Plan and other local GHG reducing policies is consistent with the long-term emissions reductions targets for climate stabilization articulated in AB 32 and California's 2017 Climate Change Scoping Plan. The statewide reduction goals set forth in the Scoping Plan call for reducing emissions levels to 80 percent below 1990 levels by the year 2050. Accordingly, 2050 is the minimum appropriate planning horizon for analyzing annual emissions of a long-term project such as the City's General Plan.

C1-28 cont.

Critically, meeting the statewide 2050 goals requires continuing and steady annual reductions in both total and per capita GHG emissions. *See* California's 2017 Climate Change Scoping Plan, CARB, April 1, 2018 at 18[42]. Because state policy aims to steeply reduce GHG emissions over that same time period, it is imperative that the RPEIR inform the public and decision-makers whether the General Plan implementation directly conflicts with the state's reduction goals. Of course, as mentioned above, that analysis should include the Project's anticipated emissions out to 2050. As the California Supreme Court has held, an agency "abuses its discretion if it exercises it in a manner that causes an EIR's analysis to be misleading or without informational value." *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 457. Here, neither the GHG Plan nor the EIR provide evidence that emissions reductions targets will be met.

4. The GHG Plan Presents Vague Measures That Cannot Produce the Necessary Emission Reductions and Lacks Evidence of the Development of Implementation Programs

The GHG Plan's most fundamental weakness may be its failure to identify a set of GHG reduction measures that comes anywhere close to achieving the City's desired targets and goals. The GHG Plan offers only a vague assurance that the "GHG Plan Update ensures conformity with the mandates of California Supreme Court in the Newhall Ranch case and the State of California's latest GHG regulations" (GHG Plan at i) but fails to comprehensively address how it will "ensure conformity" and does not demonstrate how these policies in the GHG Plan will reduce emissions by the amounts necessary.

C1-29

Indeed, many of the GHG reduction measures collected in the GHG Plan from various elements of the General Plan represent vague, unenforceable, unquantifiable commitments to "encourage" or "promote" various actions (*see* Section V.B below for specific examples). Although measures of this sort may be appropriate to supplement more concrete requirements, identification of specific, enforceable measures and quantification of resulting emissions reductions are required to demonstrate consistency with quantitative targets and goals.

[42] Available on CARB's website at https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf, accessed on May 10, 2021/

Enforceable, concrete commitments to mitigation also are required under CEQA. Neither the GHG Plan nor the RPEIR contain adequate measures of this kind. Such measures are vital here given that the City needs tremendous reductions in emissions by 2035 and even greater reductions in 2050, particularly through reductions in VMT, to achieve state-mandated targets. The City will be unable to achieve these reductions through unenforceable policies.

In addition, although the GHG Plan states conclusions regarding projected levels of GHG emission reductions under the GHG Plan, it fails to provide evidentiary support for those conclusions. For example, that plan indicates that required emissions reductions are met for 2020, but provides no evidence that the GHG Plan policies will be enforceable and effective at meeting emission reduction targets. GHG Plan at 4-4. In addition, the GHG Plan concludes that the reductions will be met for 2030 and 2035, but again provides no evidence to support this conclusion. GHG Plan at 5-34. And although the GHG Plan appears to be relying heavily on VMT reduction to meet these targets (GHG Plan at 5-34; see also RDEIR at 4.8-41), this appears inconsistent with the RDEIR's conclusion that increases in VMT amount to a significant and unavoidable Transportation impact (RDEIR at 4.16-44).

Meanwhile, the approval process and checklist the GHG Plan sets for individual development projects to qualify for CEQA streamlining is too undefined to ensure that projects will achieve necessary GHG reductions. This severely undermines the GHG Plan's ability to reduce emissions. This is especially serious given that the Plan relies largely on reducing emissions from new development because "[r]esidents of new development projects will achieve lower per capita rates than residents of existing development." GHG Plan at 1-8.

The Plan specifies a review process for proposed new developments subject to discretionary approval that are consistent with the underlying land use and zoning designations. Such projects would review the GHG Plan Update Consistency Checklist, and incorporate and implement design features or mitigation measures "as needed to demonstrate consistency." GHG Plan at 6-1, -2. The GHG Plan does not specify what these proposed projects must demonstrate consistency with. For example, if it is consistency with the Checklist itself, what would consistency with the Checklist entail? Adoption of one or more measures included on the Checklist? Adoption of all measures included in the Checklist? This requirement is vague and unclear, even after edits to the Checklist in the most recent GHG Plan update. Furthermore, the Checklist itself contains only a small number of measures, some of which are optional, or appear to already be required by state law or local policy. GHG Plan Checklist at 1-3Appendix B to GHG Plan. Notably, the GHG Plan does not clarify how it will be determined if design features or mitigation measures will be "needed," and does not specify that all possible features or measures will be required. *Id.* It further does not make clear whether a project may still take advantage of CEQA streamlining if it does not comply with all or certain measures on the checklist. *Id*. It is also unclear how the City will determine how a project is consistent with the Checklist given that not all the measures are mandatory. *Id*.

Meanwhile, the approval process for new discretionary industrial projects requiring a general plan amendment inexplicably exempts emissions from stationary sources from consideration in the significance determination. GHG Plan at 6-2. Neither the GHG Plan nor the RPEIR provide any justification for omitting stationary sources from CEQA review for these projects. To ensure that future projects are adequately reviewed, all emissions, including stationary sources must be considered in the CEQA analysis.

C1-29 cont.

5. The GHG Plan Lacks a Reliable Mechanism for Monitoring Compliance

Under CEQA Guidelines section 15183.5, a qualifying plan must establish a mechanism to monitor the plan's progress toward achieving reduction targets. The City's GHG Plan does not meet this requirement. The Plan concedes that its implementation and monitoring steps are "suggested—not required" (GHG Plan at 7-1) even though the Plan states that "successful implementation of the GHG Plan Update will require implementation and monitoring." *Id*. The GHG Plan then states: "presently it would appear that without future State action the City would need to implement the local reduction strategies to reach its reduction targets for 2035." GHG Plan at 7-2. This casts doubt on the City's plans for implementing reduction strategies, yet according to other sections of the GHG Plan, the City must implement local reduction strategies regardless in order to meet reduction targets. GHG Plan at 5-33. This further underscores the need for a reliable monitoring mechanism. Moreover, although the RPEIR, at Mitigation Measure GHG-1, calls for the Director of the City Planning and Development Department to "ensure" that discretionary development projects are consistent with the GHG Plan and implement all measures deemed applicable to the project through the GHG Reduction Plan Update-Project Consistency Checklist, it includes no mechanism to monitor the City's progress in achieving reduction targets.

C1-30

6. The GHG Plan Does Not Satisfy the Requirements for CEQA Streamlining and Must Be Revised to Indicate That

The GHG Plan allows for streamlined review for new projects subject to discretionary review and that trigger review under CEQA. GHG Plan at iv. As drafted, however, the GHG Plan falls far short of the requirements of CEQA Guidelines section 15183.5. In order to support a determination that climate action plan consistency eliminates significant climate effects, a climate action plan must, among other things, clearly demonstrate that its prescribed measures will actually achieve the reductions necessary to attain the climate action plan's stated goals. CEQA Guidelines § 15183.5(b)(1)(D). As discussed above, the GHG Plan provides no basis for such a conclusion. The GHG Plan and the RPEIR should therefore be revised to make explicit that the GHG Plan does not contain sufficient specific, enforceable GHG reduction measures to support streamlined CEQA review of future projects. Development projects in Fresno are already subject to great discretion regarding the level of applicable environmental review. *See, e.g.* Attorney General's Letter to City's Director of Development and Resource Management, *Re: City of Fresno's South Industrial Priority Area Specific Plan* (August 2, 2019), at 11-12. The City cannot, in addition, allow most projects subject to discretionary review bypass GHG analysis under the GHG Plan.

C1-31

B. The PEIR Fails to Adequately Analyze and Mitigate for the General Plan's Greenhouse Gas Emissions

The RPEIR, like the GHG Plan, concludes that implementation of the General Plan, along with implementation of other local policies, will enable the City to meet state-mandated GHG reduction targets. RPEIR at 4.8-46, 50. The City therefore relies on implementation of these policies to mitigate GHG emissions resulting from implementation of the General Plan.

C1-32

Courts have clarified that an EIR is inadequate where proposed mitigation measures are so undefined that it is impossible to evaluate their effectiveness. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 79. Moreover, "[m]itigation measures must be fully enforceable through permit conditions, agreements, or legally binding instruments." CEQA Guidelines § 15126.4(a). The record must also contain substantial evidence of the measures' feasibility and effectiveness. *Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1027.

Unfortunately, the GHG mitigation identified in the PEIR fails to meet these standards. Many of the General Plan's policies and programs relied on to mitigate impacts related to GHG emissions are vague, optional, directory, or otherwise unenforceable, or lack evidence to support their assumptions. Emissions reductions cannot be assumed from such policies. A few examples—out of numerous instances—include the following:

- General Plan Objective UF-12. Directing the City to locate *roughly* one half of future residential development in infill areas (emphasis added). RPEIR at 4.8-19. However, the General Plan provides liberal definitions for terms such as "roughly" and "approximately" as applied in the Plan. It states that use of these terms is intended to be flexible so that depending on context, a reference to "approximately one-half" could vary at least 10 to 15 percent and use of the term "roughly" could include twice that amount or more. General Plan at 1-30. Anywhere from 20 percent to over 80 percent of future development could occur in infill areas.
- General Plan Policy RC-5-c: GHG Reduction through Design and Operations. "*Promote* the expansion of incentive-based programs that involve certification of projects for energy and water efficiency and resiliency. . . . *Promote* appropriate energy and water conservation standards and facilitate mixed-use projects, new incentives for infill development, and the incorporation of mass transit, bicycle and pedestrian amenities into public and private projects." RPEIR at 4.8-28 (emphasis added).
- Building Energy Efficiency. "The City *encourages* developers to achieve the *voluntary* tier levels from the CPUC Energy Efficiency Strategic Plan, which ultimately lead to net zero energy consumption for residential development by 2020 and non-residential development by 2030." RPEIR at 4.8-43.
- General Plan Policy RC-8-b: Energy Reduction Targets. "Strive to reduce per capita residential electricity use to 1,800 kWh per year and non-residential electricity use to 2,700 kWh per year per capita by developing and implementing incentives, design and operation standards, promoting alternative energy sources, and cost-effective savings." RPEIR at 4.8-31.
- General Policy RC-8-c: Energy Conservation in New Development. "*Consider* providing an *incentive* program for new buildings that exceed California Energy Code requirements by fifteen percent." RPEIR at 4.8-31.
- Electric Vehicles. The PEIR states that based upon the historic trends in Electric Vehicle (EV) ownership and the CARB Zero-Emission Vehicles (ZEV) Action Plan, it is assumed that by 2030 EV ownership in the city would reach 8.7%, and by 2035, 13% of the vehicle trips would be made by EVs. RPEIR at 4.8-4@. The

C1-32 cont.

> PEIR offers no evidence to support this assertion. The City's planned launch of an EV charging pilot program does not provide such evidence. *Id.*

Moreover, although the RPEIR purports to analyze impacts of the General Plan's continued implementation (RPEIR at 4-1), it fails to present evidence that the City has acted on these policies. The City has had over six years since General Plan adoption to develop incentive programs and reduction measures, yet it presents no evidence that any programs have been implemented. References to future plans to implement General Plan policies related to transportation demand management and VMT reduction do not provide such evidence. RPEIR at 4.8-41, 42. Nor do references to the EV charging pilot program. RPEIR at 4.8-42. Therefore, the RPEIR cannot conclude that the City will see the substantial emissions reductions from these policies necessary to meet state mandates.

Further, in concluding that General Plan implementation may directly or indirectly generate GHG emissions having significant environmental impacts and would result in significant cumulative GHG impacts, the RPEIR relies entirely on Mitigation Measure GHG-1 to reduce these emissions to less than significant. RPEIR at 4.8-47, 50. Mitigation Measure GHG-1 requires new development projects subject to discretionary review to show consistency with the GHG Plan and its CEQA Project Consistency Checklist. RPEIR at 4.8-47. However, Mitigation Measure GHG-1 relies on consistency with the very policies, described above, from the General Plan and other local programs, that require little apart from consistency with existing regulations, or with vague and unenforceable measures. This approach fails for the same reasons as noted above. Permissible mitigation under CEQA must be binding or fully enforceable. The RPEIR fails to present evidence applying Mitigation Measure GHG-1 will actually allow the City to meet GHG emissions reduction mandates.

C1-32 cont.

There are numerous feasible mitigation measures the City could adopt to reduce the General Plan's GHG impacts. Some examples include:

- Create funding incentives for projects that conform to the General Plan and development approvals to smart growth and infill development standards such as LEED Neighborhood Development standards. Alternatively, the City could adopt a policy that it will not provide or seek future funding for widening roadways to serve sprawl developments but will instead prioritize funding for projects that serve development adjacent to or within already developed areas.
- Require local hiring within the vicinity of new employment centers to reduce VMTs.
- Facilitate the development of affordable housing for lower-income residents near low-wage jobs by zoning for multi-family housing and working with affordable housing developers to assemble financing for deed-restricted affordable housing in those areas.
- Redesignate industrial land use designations on vacant parcels in areas with sensitive receptors to land uses associated with fewer emissions in order to lessen the cumulative impact of GHG emissions in areas already experiencing disproportionate air impacts.
- Adopt any number of policies that apply to new development within the City's jurisdiction. For example, it could:

- Adopt an ordinance requiring payment of indirect source impact fees from development projects, similar to what the San Joaquin Valley Air Pollution Control District requires in order to offset air pollution. The fee could be tailored to address traditional air pollution, toxic air contaminants, and disproportionate impacts on overburdened communities as well as GHG emissions through community-driven processes.
- Adopt a policy conditioning funding of certain transportation projects on a demonstration that the project will reduce vehicle-miles traveled and will not add to cumulative and disproportionate pollution burdens on disadvantaged communities.
- Adopt a policy requiring publicly accessible electric vehicle charging stations to be installed at all new buildings (residential, and commercial, and industrial) with a parking lot larger than 10 parking spots.
- Offer fee reductions, waivers, loans or grants to developers and contractors who commit to verifiable green building practices that exceed state minimum standards and that create co-benefits that reduce cumulative impacts on surrounding disadvantaged communities. *See* Attachment 11, , Exhibit K (Institute for Local Government Sustainability Best Practices) at 9.
- Provide incentives for new development projects to install home or business electric vehicle charging stations, alternative energy systems or energy efficiency upgrades. *See* Attachment 11, Exhibit K (Institute for Local Government Sustainability Best Practices) at 11.

C1-32 cont.

Even if the City cannot feasibly adopt some of these measures as part of its environmental review of the General Plan, it certainly can commit to developing and adopting specific measures in the future, provided it includes proper performance standards that will guide it in developing the measures. *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099.

C. The RPEIR's Conclusion that the Project Will Not Conflict with an Applicable Plan to Reduce GHG Emissions is Not Supported by Substantial Evidence

The RPEIR recognizes that the Project will have significant GHG-related impacts if it will conflict with an applicable plan, policy, or regulation that was adopted for the purpose of reducing the emissions of GHGs. RPEIR at 4.8-47. However, the RPEIR concludes that the Project will not conflict with any such plan, and therefore will not have a significant impact. *Id*. at 4.8-47 to 49. The RPEIR's analysis on this point is flawed.

First, the RPEIR concludes that the Project is consistent with state GHG reduction goals and with the CARB Scoping Plan, and asserts that implementation of the GHG Plan will allow the City to meet the state's reduction targets. *Id*. Yet it appears to omit data supporting this conclusion. An EIR's conclusions must be supported by substantial evidence. *Laurel Heights Improvement Ass'n*, 47 Cal.3d at 409. And without presenting such evidence, the RPEIR cannot ensure that the Project is consistent with state climate mandates.

C1-33

Second, the RPEIR fails to analyze the Project's consistency with the San Joaquin Valley Air Pollution Control District Climate Change Action Plan. Goal 3 of that plan, referenced in the RPEIR, states: "Ensure that climate protection measures do not cause increases in toxic or

criteria pollutants that adversely impact public health or environmental justice communities." RPEIR at 4.8-16. The Project is inconsistent with this goal, and therefore with the District's plan, because it results in increases of both toxic and criteria pollutants in close proximity to, and in some cases directly within, low income communities and communities of color in Fresno already overburdened by pollution – environmental justice communities.

Finally, the RPEIR fails to examine the Project's consistency with the San Joaquin Valley Air Pollution Control District's Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA. The Project, however, is inconsistent with this Guidance as well, where the Guidance finds that project-specific emissions are cumulative, and "that this cumulative impact is best addressed by requiring all projects to reduce their GHG emissions" RPEIR at 4.8-17. The RPEIR does not generally "require" such project-specific reductions, and therefore could not be found consistent with the Guidance. C1-33 cont.

VI. The PEIR Fails to Analyze and Mitigate the General Plan's Significant Energy Impacts in Violation of CEQA

Leadership Counsel's May 2020 comments discussed the PEIR's deficient analysis of the General Plan's energy impacts. The City's responses to Leadership Counsel's comments, and the RPEIR, do not remedy the deficiencies. The PEIR must be revised to fully disclose the General Plan's energy impacts and evaluate feasible mitigation measures. C1-34

A. The PEIR's Restriction of the Study Area for Energy Impacts to the Planning Area Artificially Excludes the Project's Energy Impacts

The City must revise and broaden the Study Area for energy impacts so that the energy impacts associated with all phases of project implementation are included in the impact analysis. 14 C.C.R. § 1516.2(b). An EIR's analysis must include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. *Id.*; CEQA Guidelines Appendix F. Here, the PEIR's description of the Project Area for energy impacts is the City of Fresno Planning Area. 4.6-2. However, this Project Area artificially excludes analysis of project impacts from certain phases and components of the project, including transportation-related and operational energy impacts which extend beyond the Planning Area. For example, the project designates land for industrial development and warehouse distribution centers in South Fresno. Distribution facilities will increase VMTs from trucks that travel to and from facilities along Highway 99 and other high-volume freeways and roadways. These thousands of additional truck trips will require fuel throughout their journeys and will therefore impact energy usage well beyond the Planning Area. C1-35

With respect to operations resulting from the project, the General Plan plans for extensive industrial and warehouse distribution center development in close proximity to residential areas located just outside of the Planning Area. One example is the disadvantaged unincorporated community of Malaga, which is located less than a quarter mile to the east of the Planning Area. The development and operation of industrial and warehouse distribution facilities on land that is currently vacant or used for farming may be expected to result in ambient temperature increases for nearby land uses, including existing residential, commercial, and public facilities just outside of the Planning Area.

The City failed to substantively respond to Leadership Counsel's May 2020 comments on the Draft PEIR concerning the inadequate Study Area. *See* Response to Comments, p. C3-25. The City argued that the project "would not result in any physical improvements that would require the construction of new energy generating facilities within the Planning Area," does "not change the distribution or intensity of land uses," and does "not result in any physical impacts that would affect energy." *Id.* The City is mistaken. The General Plan's implementation will foreseeably result in development that will impact energy use. These foreseeable impacts must therefore be studied in the PEIR. *See* 14 C.C.R. § 15152. Moreover, the PEIR's discussion of unenforceable and non-binding "policies and implementation programs that are focused on improving the sustainability of the city" (*id.* C3-25) does not remedy the failure to fully disclose and mitigate the General Plan's impacts.

C1-35 cont.

B. The PEIR's Project Setting Description Fails to Identify Diesel Fuel and Renewable Energy Supplies and Use Patterns in the Planning Area

An EIR's description of the environmental setting must include existing energy supplies and energy use patterns in order to permit a complete and accurate assessment of the project's energy impacts. *See* CEQA Guidelines Appendix F(II)(B). Here, the PEIR's environmental setting discussion contains just one reference to renewable energy sources—a statement of the percentage that renewable sources comprise among all energy sources generated in California. The PEIR's environmental setting discussion includes no information about existing renewable energy supplies and energy use patterns in Fresno. The PEIR must be revised to include information about supplies and usage of wind, solar, hydrogen and other renewable sources.

The PEIR's cursory discussion of existing fuel usage focuses on gasoline use by light-duty vehicles. The PEIR provides an estimate of diesel usage from trips in Fresno County in 2018 but does not state anything about the basis for that usage or provide any information about diesel and gasoline usage for trips that extend beyond Fresno County. Fresno is located in the heart of inland California, hundreds of miles from California's heavily-populated coastal cities and ports, and is home to warehouse distribution centers, agricultural processing, and other industries that rely on shipping and transportation. Thus, the PEIR's environmental setting discussion should disclose the patterns of diesel-energy usage from truck traffic to and from Fresno, including trips both within and beyond Fresno County.

C1-36

Although Leadership Counsel's May 2020 comment informed the City of the Draft PEIR's failure to fully disclose energy supplies and use patterns, the City did not substantively respond. *See* Response to Comments, p. C3-26. The City's response to the Leadership Counsel's comment merely references the PEIR's cursory energy supply discussion—which Leadership Counsel already identified as deficient. *Id.* The RPEIR similarly does not attempt to address the deficiencies.

C. The PEIR Fails to Include Information Necessary to Describe the Project and Support the City's Conclusion That the Project Will Not Have Significant Energy Impacts

CEQA requires an EIR's analysis to include "the project's energy use for all project phases and components, including transportation-related energy, during construction and operation." 14 C.C.R. § 1516.2(b). The analysis should consider not only building code compliance, but also other relevant factors such as "the project's size, location, orientation,

C1-37

equipment use and any renewable energy features that could be incorporated into the project." CEQA Guidelines Appendix F describes five topics that an EIR's project description and five topics which an EIR's energy impacts analysis must include where relevant. Appendix F(II)(A)(1-5) & (II)(C)(1- 5). Here, the PEIR fails to describe and analyze several aspects of the project's energy usage which are both relevant to the project and identified in Appendix F as important components of an EIR's energy impact analysis. The PEIR further fails to support its findings that the project's energy-related impacts are less than significant with facts and analysis.

C1-37 cont.

1. The PEIR Fails to Describe Construction-Related Energy Impacts or Support Its Conclusion That Such Impacts Are Less Than Significant Without Mitigation

The PEIR concludes that "[p]otential construction impacts would be less than significant, and no mitigation is required." The PEIR arrives at this conclusion based on only two sentences of analysis that respectively state:

> "Energy would be required during construction for the transportation of building materials, manufacturing of building materials, and the actual construction of buildings and infrastructure." PEIR, 4.6-29, and;
>
> "Energy use during construction of future development facilitated by the approved General Plan would primarily involve gasoline and diesel fuel and would represent a short-term use of readily available resources." PEIR, 4.6-30.

C1-38

Other than a general assertion regarding the primary construction-related fuel sources, this analysis contains no information about the project's construction-related energy use requirements. The PEIR does not provide any information about the amount of energy from different sources that may be expected to be used; the energy consuming equipment and processes; or the energy intensiveness of materials and equipment that may be expected for construction-related activities, as required by Appendix F. The PEIR provides no factual basis for its conclusion that construction-related energy use would be derived from "readily available resources" nor does this conclusion support a finding that the project avoids the "inefficient, wasteful, and unnecessary consumption of energy" (PEIR, 4.6-30) from construction-related activities.

The project plans for thousands of acres of new residential, commercial, and industrial development. Yet the PEIR contains no discussion of any policies or implementation measures included in the General Plan that would reduce energy consumption associated with construction. Therefore, it is likely that, without mitigation, the project will have significant energy-related construction impacts that require the identification and adoption of mitigation measures to avoid and reduce those impacts.

2. The PEIR Fails to Support Its Conclusion That Project Operational Energy Impacts Are Less Than Significant Without Mitigation

C1-39

The PEIR states that project operational energy demand "includes natural gas and electricity" and indicates that the project's operational energy requirements and use efficiencies

by amount and fuel type are less than significant.[43] The PEIR's conclusion is unfounded and its analysis fails to include the information required by CEQA. The PEIR does not provide any information about the energy consuming equipment or processes which may be used or the energy intensiveness of activities which may occur during operation of buildings and facilities developed as a result of General Plan implementation. See Appendix F(II)(A)(1) & (II)(C)(1). The PEIR also makes no effort to quantify the project's potential energy impacts or to explain why that is not possible. *See Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256. Without adequate information about the project's operational energy impacts, the PEIR provides no factual basis for its finding that those impacts are less than significant.

In addition, the factors that the PEIR relies on to support its conclusion that the project's operational energy impacts are less than significant and do not require mitigation do not in fact demonstrate that the project will not result in wasteful, inefficient, or unnecessary consumption of energy and that the project's energy impacts are less than significant. The General Plan policies which the PEIR's analysis of the project's operational energy impacts cites – Policies RC-8-a through k and Policy HC-3-d – contain no clear or enforceable requirements or commitments that ensure the reduction or avoidance of unnecessary energy consumption. PEIR, 4.6-30, 33. Rather, those policies use discretionary and vague terms and descriptions without guarantees, enforcement mechanisms or timelines to ensure implementation. In most cases, the policies fail to identify specific actions to be taken and lack quantified targets relating to the amount of energy to be saved.

For example, Policy RC-8-b calls on the City to "*[s]trive* to reduce per capita residential electricity consumption," Policy RC-8-c directs the City to "*[c]onsider* providing an incentive program for new buildings that exceed California Energy Code requirements," and Policy RC-8-I states, "[a]dopt and implement a program to increase the use of renewable energy to meet a *given percentage* of the city's peak electrical load in a *given timeframe*." Italics added. Policy HC-3-d in turn states, "[p]rovide *appropriate* incentives for affordable housing providers, agencies, non-profit, and market-rate developers to use LEED and CalGreen Tier 1 or Tier 2 standards." PEIR, 4.3-34. Policy HC-3- d includes a commentary that the "City will publicize the health, environmental, and long term economic and maintenance benefits of applying LEED, CalGreen [or] third party equivalents to projects in Fresno." These and the other policies cited by the PEIR do not demonstrate that any reduction in project energy emissions will occur compared to emissions levels that would occur without those policies nor do they show that the project's energy impacts will be less than significant and that mitigation is not required.

The PEIR bases its conclusion that the operational impacts would be less than significant in part on its assertion that "potential improvements" to energy and natural gas "facilities" for future projects, which have not yet been proposed, would be identified at the time such projects are considered. PEIR 4.6-31. The use of the term "facilities" in this sentence is unclear, and we assume it refers to all use of energy and natural gas in future projects which have yet to be proposed. That said, the PEIR provides no information about the nature or impact of such improvements as they relate to project operational energy usage nor does it provide a factual

C1-39 cont.

[43] The PEIR actually states that "continued implementation of the approved General Plan is consistent with this item," referring to a paraphrased statement the impact category contained in Appendix F, Section II(C)(1). We assume that by "consistent with" the authors of the PEIR mean that the impact in this category is less than significant. PEIR, 4.6-30.

basis for this assertion. An EIR must contain facts and analysis, not just an agency's bare conclusions or opinions. *Sierra Club v. County of Fresno* (2018) 6C5th 502, 522. Here, the PEIR's conclusion that future projects that result from General Plan implementation will reflect unidentified "potential improvements" to energy usage does not support the PEIR's finding that project operational energy impacts are less than significant.

In addition, the PEIR contends that General Plan implementation's energy impacts will be less than significant because future projects will be required to meet California Energy Code building efficiency standards and the CalGreen Code. However, a requirement that a project comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts that occur during construction and operation of a project. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173. Likewise, a statement that a project will be required to comply with Energy Code requirements does not in itself mean that project impacts are less than significant. And in this case, the PEIR does not provide support for its assertion that future projects will be required to comply with the Energy Code. Indeed, the PEIR does not identify any policies or mitigation measures that require compliance with the Energy Code. Nor does it describe how and at what stage the City will ensure such compliance. In fact, future projects that qualify for "by right" under the City's Development Code will not be required to undergo further environmental review under CEQA and will not be subject to additional mitigation measures to require compliance with Energy Code building efficiency standards.

C1-39 cont.

The City did not adequately respond to Leadership Counsel's May 2020 comments concerning these issues. Again, the City argues incorrectly that the General Plan's implementation "would not result in any physical impacts that would affect energy." Response to Comment C3-28. To the contrary, the General Plan will foreseeably result in development that causes significant energy impacts, including approximately 6,000 acres of energy-intensive industrial and warehouse development in and around South Fresno neighborhoods. Moreover, the City's reference to General Plan policies "encouraging alternative energy sources and affordable housing (*id.* C3-29), for example, does not address the PEIR's failure to identify enforceable mitigation measures for significant energy impacts.

D. The PEIR Fails to Acknowledge or Mitigate Significant Indirect Energy-Related Impacts Resulting from New Construction

The PEIR does not disclose or attempt to mitigate the energy impacts caused by new construction that will take place under the General Plan. As discussed above, the General Plan's implementation stands to significantly increase energy demand within existing residential, commercial, mixed-use and public facilities buildings due to the construction of structures on parcels that are currently vacant or are used for agriculture. New development and, in particular, the construction of large concrete distribution facilities in the Southern portion of the planning area, will, without mitigation, radiate heat into surrounding areas and increases ambient air temperatures and contribute to higher temperatures during the evenings. The increase in air temperatures means that air conditioning units in nearby structures used by people will need to consume more energy to cool the structures to desired temperatures. Because temperatures in Fresno routinely reach highs of well over 100 degrees in the summer, energy demand from air conditioners is already high in the Planning Area compared to other parts of the state and further increases in energy demand are likely to be significant. Given this and the fact that the General

C1-40

Plan plans for approximately 6,000 acres of industrial and warehouse development in and surrounding South Fresno neighborhoods that are occupied by thousands of residents and are home to schools, utility districts, commercial, and employment centers, the project's impact on increased energy usage due to AC units will likely be significant. Thus, under CEQA, the PEIR should evaluate these potentially significant energy impacts and adopt feasible mitigation measures.

Yet again, the City did not substantively respond to Leadership Counsel's May 2020 comments addressing increased energy demand caused by new construction. The City contended that the Draft PEIR was not required to address these potentially significant impacts because the review is "programmatic in nature." Response to Comments, C3-30. The City is mistaken. The use of a programmatic EIR "does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration." 14 C.C.R. § 15152. Here, the significant energy impacts from new development under the General Plan are foreseeable. The PEIR must therefore evaluate these impacts and mitigate them.

C1-40 cont.

E. The DPEIR's Analysis of the Project's Transportation-Related Energy Impacts is Inadequate

CEQA Guidelines Appendix F requires that an EIR's energy impact analysis include the "project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project," as well as the project's "project transportation energy use requirements and its overall use of efficient transportation alternatives." Appendix F(II)(C)(1)&(6). The DPEIR however makes no attempt to meet these requirements. Instead, it states only, "[t]he project would result in energy usage associated with gasoline to fuel project-related trips (i.e., the use of motor vehicles). When evaluating a long-range planning project, forecasting future travel methods and gasoline use is too speculative and not appropriate or feasible." DPEIR, 4.6-33. The DPEIR provides no explanation for why any assessment of future travel methods and/or gasoline use is too speculative and not feasible or why the DPEIR cannot otherwise comply with the energy impacts analysis requirements set forth in Appendix F. This failure violates CEQA. See *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs* (2001) 91 CA.4th 1344, 1370.

C1-41

The project-related VMT forecasts the DPEIR provides have limited value in assisting the reader in understanding the nature and the significance of the Project's transportation-related impacts. In support of its conclusion that the project will not result in wasteful, inefficient, or unnecessary use of energy, the DPEIR states:

> "Although the measures of VMT in per capita terms increase from existing conditions with the City's General Plan Update, the city's VMT is below that of the regional average and the propose project would not result in a significant impact on gasoline demand."

The fact that the DPEIR's forecasts show average VMT per capita in the City of Fresno as less than the average VMT per capita for Fresno County does not support the conclusion that project implementation would not result in the wasteful use of energy. The City and County of Fresno have distinct residential and employment land use patterns and transportation options available to residents and workers. For instance, many residents in rural Fresno employed in the

agricultural sector must travel significant distances each day to and from work on farms which are widely dispersed across the region as well as to meet their everyday household needs, as many rural communities, including disadvantaged unincorporated communities, lack grocery stores, health clinics, libraries, and other locations to obtain essential goods and services. Residents in the City of Fresno on average need to drive significantly shorter distances in order to reach their place of employment and/or obtain essential goods and services. In addition, the limited operations of Fresno County's Rural Transit Service, which reach many communities once or twice a day, makes using public transit infeasible for many residents, whereas residents in the City of Fresno have greater access to more frequent service to meet their mobility needs. Therefore, whether a given VMT level may be indicate "efficient" energy usage differs based on context and comparison of the City and County of Fresno's average VMT levels does not provide useful guidance to assess the project's energy impacts.

The DPEIR's general discussion of the General Plan's support for active transportation also does not demonstrate that the project will not result in the wasteful or unnecessary consumption of energy. The discussion only mentions one specific policy, Policy RC-8-j, which provides that the City will "[s]upport the development of a network of integrated charging and alternate fuel stations for both public and private vehicles, and if feasible, open up municipal stations to the public as part of network development." DPEIR, 4.6-12, italics added. Like other policies that the DPEIR relies on to support its findings that impacts will be less than significant, Policy RC-8-j provides no details about what "support" the city will provide for the charging network; when that support will be provided; any specifics about the extent of that network or the nature of charging infrastructure, including whether the network will serve trucks as well as passenger vehicles; and how the City will determine whether to open municipal stations to the public as part of the network. The DPEIR's general description of the General Plan's support for alternative transportation apart from motor vehicles also lacks the specificity to show that General Plan implementation will not result in energy waste. This general description also does not address if and how general plan policies ensure efficient transportation-related energy use for truck and car trips associated with industrial development in South Fresno.

C1-41 cont.

And, as discussed above, while Table 4.16-2 includes forecasts for total employment VMT, the DPEIR does not state whether this figure includes VMT resulting from truck and car trips made by employees during the course of work (rather than just commute trips); truck trips made to and from commercial and industrial facilities, such as warehouse distribution centers and agricultural processing facilities, by individuals who do not reside in and/or are not employed within the Planning Area; and VMT portions of truck and car trips that extend outside of Fresno. DPEIR, 4.6-33.

The DPEIR also makes no attempt to discuss transportation energy use requirements that may be expected (for instance, projections relating to project-related VMT attributable to cars, trucks, and/or public transit and their respective projected energy requirements) nor does it discuss the use of "efficient transportation alternatives." Efficient transportation alternatives relevant to General Plan implementation that should be discussed include the extent to which clean energy vehicles, such as electric or hydrogen fuel cell vehicles may be utilized as opposed to vehicles reliant upon diesel or gasoline. The Attorney General's guidance document, "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California

Environmental Quality Act[44]," discussed elsewhere in this letter, provides numerous examples of feasible measures to reduce unnecessary fuel usage by vehicles serving warehouse projects. These examples include but are not limited to the following:

- requirements that facility-owned and operated fleet equipment with vehicle weight rating greater than 14,000 pounds meet or exceed 2010 model-year emissions equivalent engine standards, requiring all heavy duty vehicles entering the project site to be zero-emission beginning in 2030
- prohibitions on truck idling for more than two minutes
- construction of electric truck and light-duty vehicle charging stations proportional to the number of dock doors and parking spaces respectively at the project. The City must consider incorporation into the General Plan and Development Code of these and other requirements listed in the Attorney General's guidance that would reduce unnecessary transportation-related energy consumption.
- construction of electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration
- requirements that operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking

While the Attorney General's guidance is designed to reduce the impacts of warehouse projects, the measures listed above and others included in the guidance are applicable to a wide range of industrial and commercial projects which generate significant traffic. The City must consider incorporating these and other measures into the General Plan and Development Code in order to reduce unnecessary transportation-related energy-consumption associated with the Project.

C1-41 cont.

In addition, the DPEIR's discussion of the project's energy impacts, as well as its discussion of the environmental setting, completely omits any discussion of impacts associated with the use of freight. As the DPEIR notes elsewhere, both the Union Pacific and BNSF rail lines in Fresno carry freight traffic, with the Union Pacific line carrying exclusively freight. 4.13-8. The U.S. Department of Transportation's Bureau of Transportation indicates that rail freight service was responsible for the consumption of 507 trillion BTU of distillate/diesel fuel nationwide.[45] The DPEIR must disclose the project's anticipated impacts on the use of freight, in addition to underlying energy demand associated with freight in Fresno. The presence of two freight-carrying rail lines and a BNSF intermodal hub center in Fresno and the General Plan's dedication of extensive land for industrial development, including agricultural processing and warehouse distribution uses, indicate that the project's freight-related energy impacts are potentially significant.

The City must revise the DPEIR to accurately and completely describe the project's likely energy impacts and must provide factual bases justifying its conclusions regarding the energy impact significance levels. Given the regional scope and multi-decade nature of this

[44] Available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, access on May 8, 2021.

[45] See Bureau of Transportation Statistics, Energy Consumption by Mode of Transportation, Table 4-6, available at https://www.bts.gov/content/energy-consumption-mode-transportation

project; the extensive development it contemplates; and the lack of clear and enforceable requirements that will ensure the reduction and avoidance of unnecessary and wasteful energy usage, the project will likely result in significant energy impacts which require mitigation. Pub. Res. Code § 21100(b)(3); 14 C.C.R. § 1516.2(b) ("If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use"). Mitigation measures identified must comply with the specific mitigation requirements set forth in Public Resources Code Section 21000(b)(3), CEQA Guidelines Section 15126.4(a)(1), and Appendix F(II)(D)(1-5). See also *People v. County of Kern* (1976) 62 CA.3d 761, 774 (finding an EIR deficient that failed to include a detailed statement setting forth the mitigation measures proposed to reduce wasteful, inefficient, and unnecessary consumption of energy as required by section 21100(c) and CEQA Guidelines section 15143).

C1-41 cont.

F. The PEIR Fails to Consider Electrification of Buildings as a Potentially Feasible Mitigation Measure for Reducing the General Plan's Significant Energy, Air Quality, and GHG Impacts

The PEIR errs by failing to analyze building electrification as a potentially feasible mitigation measure for reducing energy use, GHG emissions, and air pollution. The California Energy Commission recently found that "[t]here is a growing consensus that building electrification is the most viable and predictable path to zero-emissions buildings" and is "essential to California's strategy to meet its [greenhouse gas] reduction goals for 2030 and 2050.[46] Given the General Plan's significant GHG and air quality impacts, the PEIR should evaluate building electrification as a potentially feasible mitigation measure.

Building electrification substantially reduces GHG emissions. Energy use by buildings is a major source of GHG emissions, much of which comes from gas end uses, such as space and water heating. Electrification can "reduce total greenhouse gas emissions in single family homes by approximately 30 to 60 percent in 2020, relative to a natural gas-fueled home."[9] In addition, as "the carbon intensity of the grid decreases over time, these savings are estimated to increase to approximately 80 to 90 percent by 2050, including the impacts of upstream methane leakage and refrigerant gas leakage from air conditioners and heat pumps."[10]

C1-42

Building electrification also reduces air pollution. Gas appliances in buildings make up a quarter of California's nitrogen oxide (NO_x) emissions from natural gas. NO_x is a precursor to ozone and particulate matter, which are key pollutants to curb in order to comply with state and federal ambient air quality standards. All-electric buildings reduce NO_x and ground level ozone, improving outdoor air quality and benefiting public health. A recent study from the UCLA Fielding School of Public Health found that immediate replacement of all residential gas appliances with clean electric alternatives would result in 354 fewer deaths, 596 fewer cases of acute bronchitis, and 304 fewer cases of chronic bronchitis annually in California due to

[46] Docket No. 18-IEPR-01, 2018 IEPR Update Volume II, at 28, 32 (Mar. 21, 2019), https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2018-integrated-energy-policy-report-update.

improvements in outdoor air quality alone—the monetized equivalent of $3.5 billion in health benefits per year.[47]

In addition, given the disproportionately high asthma rates in low-income communities in Fresno, it is essential that the PEIR evaluate all-electric development as a potentially feasible mitigation measure.[48] Children from low-income households who have asthma often experience greater exposure to outdoor air pollution and are more susceptible to the health effects of pollution than asthmatic children from higher-income families.[49]

Requiring electrified buildings is a potentially feasible mitigation measure for reducing the significant air quality and GHG impacts identified in the DPEIR. All-electric residences can be less costly to build due to avoided gas infrastructure costs. Industry leaders have shown that all-electric construction is feasible for all building types, from single-family residences to large, commercial buildings.[50] For example, PG&E records demonstrate the average cost of gas infrastructure to serve a single-family home in an existing subdivision may be $8,700 or more. Moreover, while electric rates are expected to have long-run stability due to increased sales from electrification of vehicle and gas end uses, gas rates are likely to rise substantially as gas throughput decreases, particularly in an unmanaged scenario where avoidable capital investments in the gas system continue. Thus, the DPEIR improperly fails to consider building electrification as a potentially feasible mitigation measure.

C1-42 cont.

VII. The DPEIR Fails to Adequately Analyze or Mitigate Significant Noise and Groundborne Vibration Impacts

The DPEIR does not analyze potentially feasible mitigation measures to reduce or avoid the significant noise impacts caused by implementation of the General Plan. The DPEIR concludes that the General Plan's implementation will result in a significant increase in noise levels that cannot be mitigated. NOI-1 at 1-36. However, the DPEIR does not meaningfully evaluate ways to minimize the impact of noise on residents through noise reduction and suppression techniques, or through appropriate land use policies.

As discussed above, the City has approved millions of square feet of warehouse projects in South Fresno. The California Attorney General recently observed that the noise from the construction of these warehouses causes "intrusive impacts to nearby sensitive receptors." *See* Attorney General, *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*, at 9.[51] In addition, the Attorney General notes that trucks and on-site loading activities at warehouses can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure. *Id.* (citing

C1-43

[47] Zhu, *et al., Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California*, UCLA Fielding School of Public Health (April 2020), available at https://ucla.app.box.com/s/xyzt8jc1ixnetiv0269qe704wu0ihif7.

[48] Brady Seals and Andee Krasner, *Health Effects from Gas Stove Pollution*, Rocky Mountain Institute, Physicians for Social Responsibility, and Sierra Club, 2020, at 13, https://rmi.org/insight/gasstoves-pollution-health.

[49] *Id.*

[50] Redwood Energy, *Zero Carbon Commercial Construction: An Electrification Guide for Large Commercial Buildings and Campuses* (2019), *available at* https://www.redwoodenergy.tech/wp-content/uploads/2019/09/Pocket-Guide-to-Zero-Carbon-Commercial-Buildings-2nd-Edition.pdf

[51] Available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

Noise Sources and Their Effects (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).[52] Therefore, the Attorney General implores "developers and lead agencies [to] adopt measures to reduce the noise generated by both construction and operation activities." *Id.*

Although the DPEIR notes several examples of possible measures to reduce noise from new development—such as providing setbacks and regulating hours of operation—it fails to impose any such requirements on construction or new development to reduce noise. *See* DPEIR 4.13-13. In fact, the DPEIR asserts that all construction activity is exempt from noise controls so long as the activity is conducted pursuant to an applicable construction permit and occurs between 7:00 a.m. and 10:00 p.m. 4.13-9. DPEIR at 4.13-19. The DPEIR then contends that "short-term construction impacts associated with the exposure of persons to or the generation of noise levels . . . would be less than significant" because construction noise is exempt from the City's noise ordinance. *Id.* That is not how CEQA works. The City ordinance's exemption of construction noise does not authorize a finding that construction noise will be less than significant. To the contrary, the lack of any applicable local regulation controlling construction noise impacts indicates the need for mitigation to address noise impacts. CEQA provides no exemption for mitigating construction noise impacts simply because a local ordinance does not apply to such impacts.

The City must analyze potentially feasible mitigation measures for the significant construction noise impacts caused by the Project, which the DPEIR acknowledges could be approximately 90 decibels (dB) at 50 feet. 4.13-18. That level is known to cause hearing damage. DPEIR at 4.13-5. In fact, construction noise impacts are known to occur at over 90 dB at 100 feet from the source, and over 80 dB at 200 feet from the source. *See* Kimley Horn, *Acoustical Assessment of Sierra Avenue and Casa Grande Warehouse Project City of Fontana, California* (June 2020), at 20, Table 6.[53] Although the DPEIR acknowledges that activities anticipated by the General Plan will expose sensitive populations to excessive groundborne vibration and groundborne noise levels (DPEIR 4.13-24), the PEIR fails to discuss any potential feasible mitigation measures. The DPEIR observes that disturbance due to groundborne vibration and groundborne noise are "usually contained to areas within about 100 feet of the vibration source" and as far as 200 feet. PEIR at 4.13-6. Despite identifying this 100 to 200-foot impact area, the DPEIR asserts that requiring a 25-foot buffer between heavy construction equipment and existing structures would mitigate groundborne vibration impacts to less than significant. DPEIR 4.13-24 (Mitigation Measure NOI-2); Table 1-1 at 1-36. The DPEIR provides no analysis for this conclusion that a 25-foot buffer will mitigate noise that the DPEIR itself admits is significant within a 100 to 200-foot area.

Instead of attempting to mitigate noise impacts, the DPEIR improperly proposes to relax noise limits. For instance, the DPEIR proposes to increase the maximum allowable noise exposure level for noise-sensitive land uses such as residential, transient lodging, hospitals/nursing homes, and churches/meeting halls from 60 to 65 dB. DPEIR at 4.13-22. This increase is not supported by any rational analysis or evidence. The DPEIR merely states that the increase is justified considering the "intensification of land uses in the city" and the "continuing

C1-43 cont.

[52] Available at https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm

[53] Available at https://www.fontana.org/DocumentCenter/View/32906/Sierra-and-Casa-Grande-Appendix-G---Noise

urbanization of the city." *Id*. This is not a legitimate reason to allow development to expose sensitive populations to unmitigated noise pollution.

Likewise, the DPEIR proposes a 3 dB increase from ambient levels as a significance threshold for noise impacts (Policy NS-1-j). Again, the DPEIR does not explain why this 3 dB threshold was selected or is appropriate for determining the significance of noise impacts. In any case, the DPEIR fails to acknowledge that noise thresholds set in General Plans and ordinances are not determinative of whether noise impacts are significant. *See Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 732. Accordingly, the City's reliance on this arbitrary 3 dB significance threshold is misplaced and may not be used to analyze the noise impacts of future development. Thus, the DPEIR fails to analyze and mitigate significant noise impacts in violation of CEQA.

It is critical for the DPEIR to evaluate potential mitigation of the significant noise impacts that will foreseeably occur from General Plan implementation. The City should consider, at a minimum, the following potentially feasible mitigation measures identified by the Attorney General's *Warehouse Best Practices* guide:

- Siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors;
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets;
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility;
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility;
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

See Attorney General, *Warehouse Best Practices*, at 5. In addition, the City should consider limiting construction to daytime hours, e.g., 9:00 a.m. to 5:00 p.m.

C1-43 cont.

VIII. The DPEIR Fails to Adequately Analyze and Mitigate the Project's Aesthetic Impacts Resulting From Industrial Development in Rural Settings and Residential Areas

C1-44

The General Plan's designation of nearly the entire South Industrial Priority Area for industrial development would result in the visual transformation of this area, which includes

scenic semi-rural and agricultural landscapes, low-density residential neighborhoods, and cultural and architectural landmarks like Wat Brahmacariyakaram, to a sprawling industrial center. The aesthetic, light, and glare impacts resulting from buildout of the South Industrial Priority Area are clearly significant and require thorough analysis and consideration and adoption of all feasible mitigation measures. Indeed, the implementation of the General Plan and Development Code since their adoption in 2014 has already wrought significant aesthetic impacts in the area. The approval and development of millions of square feet of towering warehouse distribution centers has replaced farmland, blocked scenic vistas of the Sierra Nevada mountains, directed light glare into residents' homes at night, and filled roadways with heavy-duty trucks, vans, and car traffic.

Leadership Counsel detailed for the City the potential for and occurrence of significant aesthetic impacts associated with the Project in its May 2020 comments on the DPEIR. Unfortunately, both the DPEIR and the RPEIR fail to address these issues. The RPEIR includes no revisions to address the comments regarding aesthetic impacts that Leadership Counsel previously raised. In its Response to Comments, the City claims that the "the proposed project does not include any land use changes" that would result in aesthetic impacts, "because the current land uses have already been adopted." Response to Comments, p. 3-78. But as discussed elsewhere in this letter, the City cannot evade a holistic review of the General Plan's impacts by narrowly defining the project as "continued implementation of the General Plan." The City's Response to Comments also asserts that analysis is not required at this time, because future development would be subject to CEQA analysis. Yet, CEQA does not permit the City to defer analysis and mitigation of reasonably foreseeable impacts because of possible CEQA review of subsequent projects. Further, the City's response ignores the fact that the Development Code provides for the approval of dozens of land use types without project-level discretionary review. As discussed further below, the DPEIR's analysis of the Project's aesthetic impacts and its failure to identify suitable mitigation to reduce those impacts fails to comply with CEQA.

C1-44 cont.

A. Substantial Adverse Impacts on Scenic Vistas in Rural and Residential Areas

The DPEIR concludes that the project would not have a substantial adverse effect on a scenic vista and that no mitigation is required to achieve this result. The analysis supporting the DPEIR's conclusion fails to acknowledge or describe the impacts on scenic vistas of the Sierra Nevada Mountain Ranges and semi-rural agricultural landscapes that implementation of the General Plan has had and will continue to have on South Fresno neighborhoods which are designated by the General Plan Land Use Map for industrial development.

The DPEIR states that:

> "scenic vistas may be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors. Typical scenic vistas are locations where views of rivers, hillsides, and open spaces are accessible from public vantage points." (4.1-3)
>
> The General Plan's designation of about 5,000 acres of land for industrial development

C1-45

South Industrial Priority Area has and will continue to directly diminish the area's scenic quality and block the view of scenic vistas. These impacts result from large industrial warehouses and other industrial buildings constructed on vacant land and land occupied by agricultural or low-density residential uses and heavy truck and car traffic on local roadways generated by these industrial facilities. The height, mass, and location of industrial development permitted by the General Plan and Development Code and of the truck and car traffic which this development generates has and will continue to have a substantial adverse impact on scenic vistas.6 Since the General Plan's adoption, more than two million square feet of warehouse distribution facilities have been developed and permitted in the area.

The Development Code permits buildings in all industrial zone districts, including the Heavy Industrial, Light Industrial, Regional Business Park, and Business Park zone districts, to stand up to 60 feet tall (or up to 30 or 40 feet when the building is within 40 or 50 feet of a residential property line) and requires buildings in those zone districts to be set back just 15 feet from the property line. FMC § 15-303, Tables 15-302-1 & 15-302-2. The construction of these buildings mars the scenic vista of the rural agricultural setting, as low-lying vineyards, agricultural lands, and small residential communities become interspersed with expansive and towering buildings in relation to the setting. The industrial buildings and other features of industrial sites, like retaining walls and berms, also substantially or completely block views of the Sierra Nevada Mountain Ranges from both public and private spaces depending on the location of the observer. For instance, since the General Plan's adoption, the construction of the Ulta Beauty distribution facility and retaining walls along the facility's perimeter at 850 East Central Avenue has blocked the previously open view of the Sierra Nevada mountain range from the community of Daleville on E Daleville and S Mary Avenues, which is adjacent to the facility.

C1-45 cont.

In addition, constant truck and car traffic associated with these projects blocks and interferes with scenic vistas in the Southern portion of the Planning Area. Pursuant to the California Vehicle Code, trucks may be up to 14 feet in height, and the average car is five to six feet tall. For just one warehouse project alone, an expansion of the existing Amazon warehouse in the North Pointe Business Park which was approved in 2021, the project's Traffic Impact Analysis estimated that the project would generate 3,274 daily vehicle trips into the neighborhood or 1,195,010 vehicle trips per year. Northpoint Building 31 Trip Generation and Impact Assessment, p. 4, Attachment 5. The continuous passage of trucks, vans, and cars on local roadways to and from this and other projects which have been approved since the General Plan's adoption and future projects which will occur with continued implementation of the General Plan substantially diminishes the quality and blocks the view of both the Sierra Nevadas and agricultural lands for pedestrians and users of private property throughout the area.

Because the DPEIR fails to study these significant impacts on aesthetics, despite our previous comments describing these impacts to the City, the DPEIR fails to live up to its role as an informational document. Further, given the clearly significant impacts which have and will continue to result from General Plan and Development Code implementation, the DPEIR must consider and identify feasible and legally enforceable mitigation measures to reduce the project's impacts to scenic vistas on rural and residential areas. We recommend that the City consider the following measures to reduce these impacts:

- Revise the General Plan land use designations for the SIPA to non-industrial land

use designations that establish smaller height and building size limitations (i.e, designations other than Heavy Industrial, Light Industrial, Regional Business Park, and Business Park) around schools, places of worship, neighborhoods, residences, and public parks.

- Revise the Development Code to reduce the maximum building height allowed in Employment Districts where buildings would block the view of a scenic vista.
- Require enhanced set backs, installation of mature evergreen trees, and adoption of other design features for industrial development in areas that are near residential neighborhoods to mitigate adverse impacts on scenic vistas.
- Re-route truck traffic from roadways lined with residences in industrial-designated areas.

C1-45 cont.

B. Significant Adverse Impacts on the Visual Character and Quality of Rural and Residential Neighborhoods

The DPEIR recognizes that the land uses proposed by the General Plan would replace existing rural, agricultural, and open space uses and that as a result, continued implementation of the General Plan will substantially alter the visual character within the Planning Area. Yet the DPEIR's analysis fails to describe the magnitude and severity of this impact, including in communities and neighborhoods located in these areas, and the DPEIR fails to identify feasible mitigation measures that would effectively reduce the projects impacts on visual character and quality. The City must revise the DPEIR to address these flaws and recirculate it for public review and comment. *Sierra Club v. County of Fresno* (2018) 6 C5th 502, 514 ([A]n EIR's designation of a particular adverse environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect.); *City of Long Beach v. City of Los Angeles* (2018) 19 CA5th 465, 486.

Buildout of the General Plan has and will continue to dramatically adversely impact the visual character and quality of these areas due to the replacement of agricultural land uses, low-density residential housing, and cultural and architectural landmarks like Wat Brahmacariyakaram with industrial development pursuant to the General Plan land use map. features of the area. Vineyards, single-family farm residences, and single-family residences and neighborhoods would be replaced with concrete warehouses and other industrial facilities up to 60 feet tall pursuant to Development Code standards for industrial zone districts. These changes would significantly alter and degrade the visual character or quality of views of the area, including from streets, sidewalks, schools, places of worship, and residences.

C1-46

We note that the DPEIR's significance criteria for impacts to visual character and quality do not include impacts to views from privately-owned spaces. While the project would have significant impacts on the visual character of the area from both public and private spaces, The DPEIR provides no explanation for its exclusion of privately owned spaces. CEQA does not limit an EIR's impacts analysis only to impacts that affect spaces within the public domain. The DPEIR must be revised and recirculated to address the Project's impacts to visual character and the quality of views on privately-owned spaces, including from the residences and other privately-owned property in the neighborhoods and communities located in and near the South Industrial Priority Area. The DPEIR must identify and adopt suitable mitigation to address these impacts too.

Furthermore, while DPEIR acknowledges that the project will result in a potentially significant impact on visual character and quality of public views, it states that no feasible

mitigation measures are available without even considering any measures at all. The DPEIR is incorrect. Many feasible mitigation measures exist to avoid and reduce the Project's impacts of visual characters and the quality of public views. These include the same mitigation measures identified sub-section (A) of this section of this letter above. In addition, the City could adopt mitigation measures that would establish a commitment by the City to invest in the visual character of the area, including through the installation of landscaping, the modification of Development Code design standards to ensure compatibility of new development with the existing rural residential character of the area, and investment in aesthetically pleasing public spaces, such as trails and parks, which could be used by residents and workers.

C1-46 cont.

IX. The DPEIR Fails to Acknowledge the Project's Significant Land Use Impacts Resulting from the General Plan's Division of Established Communities

The DPEIR finds that the Project "would not physically divide an established community," and therefore would have a less than significant impact in this impact category. In reaching this conclusion, the DPEIR fails to consider the impacts of the General Plan's application of industrial land use designations to entire residential neighborhoods in South Fresno and policies promoting shovel ready development. The City failed to correct this serious omission in its RPEIR and in doing so, dismissed comments by Leadership Counsel in its May 2020 comments in which it raised these issues. As the City did for other portions of Leadership Counsel's May 2020 comments, the City based its dismissal of our comments on its description of the Project as only the "continued implementation of the General Plan" rather than the General Plan in its entirety, including its land use designations. Response to Comments, p. 3-115. The City's reliance on an inaccurate and segmented project description does not excuse it from analyzing, acknowledging, and mitigating the Project's significant impacts from its designation of entire neighborhoods for industrial development.

The DPEIR's brief analysis of this impact category states that "future development could create established communities within rural communities that are located in the outer areas of the Planning Area," and that "[i]t is anticipated that as future development in accordance with the approved General Plan expands within the rural areas, there could be continuing conflicts between existing and new land uses, which could create a division of existing rural communities." DPEIR, 4.11-28. The DPEIR then goes on to state that objectives and policies contained within the General Plan would "lessen the impact of dividing established communities by increasing or maintaining connectivity to the surrounding area." Id. This analysis does not acknowledge that in addition to new residential development in and around existing rural communities, the General Plan also plans for industrial development where residential neighborhoods are currently located. The General Plan Land Use Map designates entire neighborhoods and communities, as well as the land surrounding these communities, for industrial development. Residential neighborhoods and communities designated for industrial development include but are not limited to the following:

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- the community of Daleville
- the community bounded by East Central, South Orange, and East Cedar Avenues
- the portion of the community of Calwa located to the South of East Jensen Avenue
- the community bounded by South Peach Avenue on the East and East Jensen Avenue on the North

- the community bounded by South Rose, East Kaviland, and East Grove Avenue
- a mobile home park located in the Jane Addams neighborhood of the City of Fresno

The General Plan's designation of these and other communities for industrial land uses is designed not only to divide established residential communities, as industrial development projects occur in the midst of those communities, but ultimately to replace those communities with industrial development. General Plan, p. 3-31, Figure IM-1. In addition, the designation of homes and other community-serving land uses for industrial development may impair residential property owners' ability to successfully obtain credit for home maintenance and permits for home improvements and reduce their ability to sell their homes for residential use. The DPEIR's designation of residential neighborhoods for industrial land use requires analysis, mitigation and a finding of significance. It is critical that the City acknowledge and assess these impacts in order for the public and decision-makers to have accurate information about the nature and severity of the Project's land use impacts. The DPEIR's lack of such analysis renders it deficient under CEQA.

Moreover, the DPEIR fails to identify and acknowledge General Plan policies facilitating investment in shovel ready development opportunities and permit streamlining for areas designated for industrial uses (which the General Plan calls "employment" land uses) . See e.g., General Plan, Ch. 2-3, 22 (Policies ED-1-e & j), 24 (ED-3-b), 27 (ED-5-c). By planning for and supporting industrial development surrounding residential communities, the General Plan results in negative impacts on housing quality and on schools, places of worship, corner stores, and other neighborhood-serving institutions and destabilizes the long-term viability of the community. General Plan Policy MT-1-c, "Plan Line Adoption," (General Plan, 4-26) furthers the City's objectives to transform residential neighborhoods to industrial centers by providing for the adoption of Official Plan Lines "for transportation corridors, roadways, and bicycle/pedestrian paths/trails, as necessary to preserve and/or obtain right-of-way needed for planned circulation improvements." General Plan, p. 4-26. Since the General Plan's adoption, the City has implemented Policy MT-1-c by adopting OPLs for East Central Avenue which plan to widen East Central Avenue in a manner that would encroach into residential property and allow for higher traffic volumes in closer proximity to homes in the SIPA. MT-1-c therefore accelerates the decline of SIPA neighborhoods and their ultimate division and elimination. But the DPEIR does not acknowledge or analyze the impacts of these policies on existing communities.

The DPEIR lists certain General Plan objectives and policies as evidence that project impacts associated with the division of existing communities will not be significant. But the DPEIR provides no analysis of those objectives and policies to explain why they support that conclusion or how they would counteract policies aimed at the division of existing communities. The DPEIR simply states that they would "reduce the potential to physically divide an established community to a less than significant level," and that "[n]o mitigation is required." DPEIR, 4.11-28. These policies appear to do nothing to reduce the likelihood that the General Plan's industrial land use designations and policies will result in the division and replacement of existing communities with industrial land uses. For example, Objective UF-8 states, "Develop each of Downtown's neighborhoods and districts, according to its unique character,"; Policy UF-12-a provides, "[d]esign land uses and integrate development site plans along BRT corridors,

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with transit-oriented development that supports transit ridership"[54]; and Policy UF-12-g directs the City to establish design standards for mixed-used activity centers (none of which are located within the areas designated purely for industrial development listed in this section above). Policy LU-1-b calls for the creation of "appropriate transitions or buffers between new development with existing uses," yet the General Plan Land Use Map, as explained above, provide for no buffers or transition zones between areas designated for heavy industrial land use and existing residential and community-serving land uses. And as explained above in this this letter, the Development Code also lacks standards to create buffers and ensure that existing residential neighborhoods are protected from new industrial and warehouse development.

C1-47 cont.

For these reasons, the DPEIR fails to support its conclusion that the division of existing communities is a less than significant impact with substantial evidence, and the City ignores crucial information provided by Leadership Counsel and evident from a review of the General Plan land use map and policies that demonstrate that these impacts will be significant. The City must revise and recirculate the DPEIR to correct these deficiencies in order to comply with CEQA.

X. The DPEIR's Analysis of Project Impacts to Population and Housing is Deficient Because it Fails to Acknowledge the Project's Potential to Displace Substantial Numbers of People

The DPEIR must consider the project's potential impact on population and housing, and specifically, whether the project would "[d]isplace substantial numbers of existing people or housing." 14 C.C.R. § 15000 *et seq.*, appen. G, § XIV; *cf. Hollywoodians Encouraging Rental Opportunities v. City of Los Angeles* (2019) 37 Cal. App. 5th 768, 774. The DPEIR does not adequately do so here.

The DPEIR's analysis of the Project's potential to displace existing people or housing fails to acknowledge or discuss the potential for displacement associated with planned industrial development and fails to provide facts to support its assertions that General Plan policies will mitigate any displacement impacts to less than significant levels. DPEIR, 4.14-14, 15. As discussed above, the General Plan designates entire residential communities (both within and outside of current City limits) and land up to and surrounding housing for industrial development. As a result of the designation of residential uses for industrial development, the project anticipates the conversion of hundreds of units of housing to industrial land uses. And, as also discussed above in this letter, the designation of land adjacent to housing for industrial uses and the use of local roadways where housing is located for heavy truck and car traffic serving those industrial uses will contribute to the significant deterioration of housing quality and the relocation of neighborhood residents to more suitable housing. The elimination of housing stock and the relocation of residents from neighborhoods designated for industrial development will put pressure on the housing supply. These housing supply impacts may be expected to occur not only in the City of Fresno but also elsewhere in Fresno County and beyond, given that most of the housing stock impacted by the General Plan's industrial land use designations are located outside of City limits and near the edge of the Planning Area and residents who relocate will not necessarily move to an area within the Planning Area. Notably, the Study Area that the DPEIR

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[54] None of the residential communities listed in this letter as designated by the General Plan for industrial development are located along a designated BRT corridor.

adopts for this analysis – the Planning Area – fails to allow for the consideration of the impacts of that displacement outside of the Planning Area in Fresno County and beyond. See DPEIR, 4.14-2.

The DPEIR dismisses the project's potential displacement impacts by stating that the General Plan implementation "would also result in the development of a net increase in units when compared to the existing inventory" and that the housing units available as replacement units for those that could be removed as a result of General Plan implementation would be increased. DPEIR, 4.14-15, 15. However, the DPEIR fails to state how many units may be expected to be developed with General Plan implementation and how this compares to the number of units which may be lost due to displacement coupled with the demand for housing among existing and future residents. In addition, the DPEIR says nothing of the expected price levels of new housing development and how that compares to price levels which displaced residents can afford. According to the City of Fresno's 2019 and 2018 Housing Element Annual Progress Reports, new residential development in the City of Fresno has primarily served above-moderate income households. On the other hand, South Fresno neighborhoods which the General Plan designates for heavy industrial development have high poverty rates, meaning that many residents in these neighborhoods are unlikely to be able to afford new residential development that occurs as a result of General Plan implementation.

In addition, the DPEIR's statement that a relocation analysis would be required to be prepared "[p]rior to any displacement" is inaccurate and misleading. First, a displacement study will not be required prior to relocation of residents who move to avoid the impacts of new industrial development and roadway expansion or for residents who chose to sell their homes to a buyer that develops the land for industrial uses. Second, pursuant to General Plan policies promoting permit streamlining for "employment" land uses, much new industrial development occurs by right under the Development Code and is not subject to CEQA or a displacement analysis that the law might otherwise trigger.

Finally, the DPEIR also states that several Housing Element policies and objectives would "reduce housing impacts," and "avoid the need for construction of replacement housing due to the development of a net increase of new housing units" and that therefore "[n]o mitigation would be required." DPEIR, 4.14-15. This analysis fails to contain facts necessary to support its conclusion. First, the DPEIR does not make the connection between the housing element policies to which it cites and the conclusion that the General Plan's displacement required. The DPEIR does not explain or demonstrate (1) how or why the specific policies cited would lead to an actual reduction in impacts, (2) the nature and scope of the reduction in housing impacts which may be expected to occur and/or the nature and number of new housing units which may be developed, or (3) how the DPEIR determined that the reduction in housing impacts and/or the development of new units as a result of the housing element objectives and policies would reduce housing and population displacement impacts to a less than significant level. The analysis also does not explain why implementation of housing element policy and objectives in and of themselves will reduce potential displacement impacts to less than significant levels, taking into consideration existing lower-income housing needs in Fresno, which include the need for more than 15,000 units for lower-income households; increasing employee to housing ratios identified by the DPEIR, and the very low levels of lower-income housing production compared to the need that has occurred as a result of Housing Element implementation to date. DPEIR, 4.14-3, 7 (identifying the City's current lower-income RHNA of 8,955 units and the City's carry-over RHNA of 6,476 units);

C1-48 cont.

The City must revise the DPEIR to accurately and completely acknowledge and disclose the project's potential to displace substantial numbers of existing people and units of housing in existing residential neighborhoods that are planned for industrial development. *See* 4 C.C.R. § 15000 *et seq.*, appen. G, § XIV. Given the apparent significance of these impacts, the revised DPEIR must include feasible and enforceable mitigation measures to reduce and avoid these impacts.

C1-48 cont.

XI. The DPEIR Fails to Disclose & Identify Adequate Mitigation to Minimize the Project's Groundwater Impacts

A. The DPEIR Fails to Disclose or Adopt Adequate Mitigation to Minimize the Project's Groundwater Supply Impacts on Neighborhoods Reliant on Well Water

The Planning Area is located in the Kings Groundwater Subbasin which is designated by the State Water Resources Control Department as a "critically over-drafted high priority basin." North Fork Kings Groundwater Sustainability Agency "Groundwater Sustainability Plan in Compliance with the Sustainable Groundwater Management Act," (2019), p. 1-1&2.[55] The subbasin was given its high-priority status as a result of the removal of millions of acre-feet of groundwater from subsurface storage as a result of groundwater pumping exceeding recharge. Id., p. 1-2. The DPEIR acknowledges that "the City is creating an overdraft of the Kings Groundwater Subbasin." 4.10-21. The adopted 2019 Groundwater Sustainability Plan (GSP) for the Kings Subbasin notes that the "trend of groundwater overdraft was accelerated in recent years by increased groundwater pumping as[56] a result of significantly reduced surface water deliveries" during the drought from 2012 and 2016. *Id.* Given this reality, CEQA requires the DPEIR to include a thorough discussion of the project's potentially significant impacts on groundwater and propose robust mitigation measures to reduce groundwater impacts however feasible. *San Joaquin Raptor Rescue Ctr. v. Cty. of Merced* (2007) 149 Cal. App. 4th 645, 661–62. An adequate evaluation is particularly important in light of the current local drought, which the City Board of Supervisors recently declared an emergency. *See* Fresno Bee, *Fresno County leaders declare local drought emergency. One says drought is 'man-made'* (May 4, 2021). This DPEIR does not do so.

C1-49

First, the DPEIR contains no discussion about the current groundwater availability for residential communities and households which rely on domestic wells for their everyday water needs and the project's potential groundwater impacts on these communities and households. The DPEIR provides some data from City wells about groundwater level decline rates since 1990 in certain areas within the City that range from .5 to three feet per year. 4.10-3. This data does not include unincorporated areas within the Planning Area and the DPEIR does not indicate the range of years which the data represents and how reflective the decline rates are of recent trends. Between 2012 and 2016, numerous households and entire neighborhoods located in unincorporated County in the Southcentral and Southwestern portions of the Planning Area lost access to water in their homes as their wells ran dry. These households were forced to buy bottled water, rely on emergency connections to neighbors, seek emergency assistance such as the installation of water tanks from the state and non-profit organizations like Self-Help

[55] Available at http://northforkkings.org/webpages/wp-content/uploads/2020/01/NFKGSA_GSP_Final_Adopted.pdf
[56] Available at https://www.fresnobee.com/news/local/water-and-drought/article251156669.html.

Enterprises, and in the case of households with the financial resources to do so, spend thousands of dollars to drill deeper wells. The DPEIR asserts that the City's continued participation in the North Kings Groundwater Sustainability Agency (GSA) and compliance with the Subbasin GSP will result in balanced water demand by 2040. 4.10-21, 22. Yet a balanced water demand in 2040 does not address significant impacts on households and communities impacted by groundwater depletion that occur within the next twenty years. For homes with shallow domestic wells, reductions in groundwater levels by just a few feet can mean the difference between flowing and dry taps. A potentially balanced water demand in 20 years will not alleviate the significant impact that occurs should households lose access to water supply in the present.

The South Fresno neighborhoods reliant upon domestic groundwater are disproportionately lower-income and disproportionately comprised of people of color, immigrants, and people who speak languages other than English compared to other parts of the Planning Area. The DPEIR's failure to disclose, analyze, and adopt feasible and enforceable mitigation measures to address the project's potentially significant impacts on groundwater supply in households that rely on domestic wells disproportionately adversely impacts protected classes and potentially violates civil rights and fair housing laws.

Second, while the GSP recognizes that recent severe and prolonged drought accelerated groundwater pumping in the Kings Subbasin, the DPEIR does not mention this in its discussion of the environmental setting nor does it disclose or discuss the likelihood of future drought conditions, water supply reductions, and increased groundwater demand that will occur as a result of climate change.[57] Without information relating to the impacts of climate change on groundwater supply between the present and the potential attainment of balanced water demand in 2040, the DPEIR fails to accurately inform decision-makers of the nature and magnitude of the project's significant impacts on groundwater supplies in the Kings Subbasin and the Planning Area as a whole and on domestic well users who are the most vulnerable to groundwater depletion.

Third, the DPEIR's calculations of the amount of water that will be available to the City of Fresno as buildout occurs do not appear to take into account groundwater depletion that occurs outside of City limits. The GSP does not contain measures to limit groundwater pumping and pumping that occurs outside of City limits may negatively impact subsurface inflow from neighboring areas and recharge supplies. The DPEIR relies on estimates of subsurface inflow and recharge supplies for its calculations of the water supply available to the City and the amount of groundwater that may be necessary. The DPEIR's failure to account for groundwater pumping outside of City limits therefore has the result of potentially inflating the DPEIR's calculation of available water supplies and understating future groundwater demand in the Planning Area. These calculation errors would artificially lessen the apparent significance of the project's impacts on groundwater supplies. The City must revise the DPEIR to its calculations with respect to groundwater pumping outside of City limits and its effects on subsurface inflow and recharge supplies and correct the DPEIR's calculations and analysis if they failed to account for the pumping.

C1-49 cont.

[57] See Michael E. Mann & Peter H. Gleick, "Commentary: Climate change and California drought in the 21st century," March 31, 2015, discussing study results showing that the climate change is influencing the frequency, magnitude, and duration of drought in California and that the co-occurrence of dry years with warm years raises the risk of drought. Published on the Proceedings of the National Academy of Science of the United States of America's website and available at https://www.pnas.org/content/pnas/112/13/3858.full.pdf

Fourth and finally, the one mitigation measure that the DPEIR proposes, Mitigation Measure HYHD-2.1, will not minimize the project's impact on groundwater supplies and will not address impacts to households on domestic wells over the next twenty years. The measure provides only that the City will "continue to be an active participant in the North Fork Kings [GSA] and the implementation of the North Fork Kings [GSP]..." The commitment for the City to be an "active participant" in the GSA and GSP implementation is undefined and lacks clear actions that the City will take that will actually reduce groundwater supply depletion. Numerous feasible and effective mitigation options to minimize this impact exist, including commitments by the City to decrease groundwater pumping, switch to other sources of water, and ensure the City does not exceed the amount it can consume within the GSA boundaries while not depleting supplies (as it is currently doing). The DPEIR must consider each of these mitigation options and incorporate them as enforceable mitigation measures which specify the actions that the City will take to ensure that the project's groundwater impacts are minimized. Pub. Res. Code §§ 21002.1(a), 21100(b)(2), 21081.6(b); 14 C.C.R. § 15126.4.(a)(2). Further, the DPEIR also must identify specific mitigation measures to minimize groundwater supply depletion impacts on households on domestic wells. Such measures may include but are not limited to the following:

- a commitment to work proactively to facilitate the connection by such households to City water supplies, including by seeking and offering financial assistance and waiving and/or reducing fees to make it financially feasible for lower-income households to connect;
- the incorporation of households on domestic wells into City planning for infrastructure extension projects serving new development and/or requirements that new development which will contribute to the City's overall water demand pay a fee to support the connection of households on domestic wells.

C1-49 cont.

XI. The RPEIR Fails to Adequately Analyze or Mitigate the General Plan's Cumulative Impacts

An EIR must discuss significant "cumulative impacts." CEQA Guidelines § 15130(a). "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." CEQA Guidelines § 15355(a). "[I]ndividual effects may be changes resulting from a single project or a number of separate projects." CEQA Guidelines § 15355(a). A legally adequate "cumulative impacts analysis" views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. CEQA Guidelines § 15065(a)(3). "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b). The cumulative impacts concept recognizes that "[t]he full environmental impact of a proposed . . . action cannot be gauged in a vacuum." *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 408. Here, the RPEIR's analysis of cumulative impacts is incomplete, cursory and superficial.

C1-50

The CEQA Guidelines provide that an agency can take two approaches to its cumulative impacts analysis. It may identify a list of past, present, and probable future projects producing related or cumulative impacts or identify a summary of projections contained in an adopted plan that describes or evaluates cumulative conditions. CEQA Guidelines § 15130(b)(1). The RPEIR

purports to use both the list of projects approach and the summary of projections approach for analyzing cumulative impacts, and the RPEIR's approach varies by impact chapter. RPEIR at 4-3. Yet a review of the impact chapters reveals that the RPEIR generally fails to disclose which approach is being used. In those few instances in which the RPEIR states that it is using the list of projects approach, it never identifies the projects that are purportedly being evaluated.

Nor is there any evidentiary support that the RPEIR's cumulative impacts analysis takes into account past projects and future projects, as CEQA requires. CEQA Guidelines § 15065(a)(3). In order for the public and decisionmakers to fully understand which projects have and have not been included in the RPEIR's cumulative impacts analysis, the RPEIR must first explicitly identify the following and then describe how the RPEIR's cumulative impacts analysis included this information:

- the change in light industrial and heavy industrial land use acreage between 2014 and 2019;
- the number of light industrial and heavy industrial projects that were approved between 2014 and 2019;
- a description of these 2014-2019 light industrial and heavy industrial projects, including the nature of the projects and whether their approval required general plan amendments and/or rezonings;
- an identification of the general plan amendments and/or rezonings to "light industrial" and/or "heavy industrial" land uses since 2019;
- an identification of the light industrial and heavy industrial projects approved since 2019;
- a list of proposed applications for general plan amendments or rezonings to "light industrial" and/or "heavy industrial" land uses; and,
- a list of proposed applications for light industrial and heavy industrial projects.

C1-50 cont.

Information regarding this development is critical to understanding the impacts of the Project. Since the 2014 General Plan was adopted, the City approved over 2.8 million square feet of industrial development, particularly warehouse projects in the South Central area of Fresno, including Amazon and Ulta warehouse projects.[58] These projects, which were approved with minimal notice to the public and little to no mitigation, have had substantial impacts on the

[58] This figure includes the following developments: three warehouse buildings located at 3455, 3523, and 3611 South North Pointe Drive, approved pursuant to Development Permit No. 17-175, and consisting of 804,045 square feet of industrial warehouse space; an Amazon distribution center also located at 3575 South Orange Avenue, and consisting of 856,000 square feet; an Ulta Beauty distribution center located at 850 East Central Avenue, approved pursuant to Development Permit No. D-16-150, and consisting of 871,020 square feet, and a warehouse located at 3608 East East Avenue, approved pursuant to Development Permit, No. P18-03577. These are only a few examples of warehouse development approved in this area since the General Plan's adoption, and we understand that at least several other projects have been approved during this time.

surrounding community. The RPEIR must analyze the impacts of these projects in combination with the development permitted under the General Plan.

C1-50 cont.

Set forth below are examples of deficiencies within each of the cumulative impacts analyses.

A. Agricultural Resources Impacts

The RPEIR's cumulative impacts section pertaining to impacts to agricultural resources purports to rely on the summary of projections approach (at 4.2-17), yet we can find no indication that the document actually used this approach. Moreover, the RPEIR fails to conduct the required cumulative impact analysis. While the RPEIR generally refers to cumulative development occurring within the city of Clovis, the county of Fresno, and the county of Madera, the RPEIR never actually identifies the nature or amount of the development in these other jurisdictions. Nor does the RPEIR identify the amount of agricultural land that would be converted to development within these jurisdictions. In addition, the RPEIR makes no attempt to determine how much agricultural land would be lost as a result of the development contemplated by the Fresno General Plan, together with the development contemplated by the city of Clovis, the county of Fresno, and the county of Madera. Notwithstanding the fact that the RPEIR provides no actual analysis, it nonetheless concludes that cumulative impacts to agricultural resources would bs be significant and unavoidable. RPEIR at 4.2-18. In further violation of CEQA, the EIR fails to provide any mitigation for this significant impact. CEQA Guidelines § 15126.4. Such mitigation should include limits on the conversion of agricultural land, requirements for restoration of agricultural lands, and the use of conservation easements to offset agricultural land conversions.

C1-51

B. Air Quality Impacts

A thorough evaluation of the General Plan's cumulative effect on air quality is particularly important because the San Joaquin Valley Air Basin is designated as "nonattainment" of the ozone, PM_{10} and $PM_{2.5}$ state ambient air quality standards. The RPEIR purports to assess the General Plan's cumulative air quality impacts by evaluating development within the San Joaquin Valley Air Basin. RPEIR at 4.3-68. However, the RPEIR fails to conduct any actual analysis of how buildout of the General Plan, together with other growth in the air basin, will affect air quality. Instead, the document offers vague statements such as "[f]uture development that may occur with the continued implementation of the approved General Plan would contribute criteria pollutants to the area during project construction and operation." RPEIR at 4.3-68. "To facilitate CEQA's informational role, an EIR must contain facts and analysis, not just the agency's bare conclusions or opinions." *Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1303. At a minimum, the RPEIR could have evaluated whether growth from the Fresno General Plan together with growth from the other jurisdictions within the San Joaquin Valley Air Basin is consistent with the projections identified in the San Joaquin Valley APCD's air quality plan.

C1-52

C. Biological Resources Impacts

C1-53

The RPEIR's discussion of cumulative biological resources fails to disclose whether it relies on a summary of projections or a list of projects approach. Regardless, it fails to undertake the analysis of cumulative impacts CEQA requires. For example, the RPEIR makes no attempt to evaluate the cumulative loss of habitat for special-status species that would result from buildout of the General Plan and other development in the area (e.g., development contemplated by city of Clovis, the county of Fresno, and the county of Madera). Nor does the RPEIR disclose how cumulative development would affect riparian habitat habitats and wetland habitats. The document lacks any substantive analysis and instead offers self-evident assertions such as "cumulative development near the San Joaquin River corridor *could* result in potential impacts on riparian habitat" and "[t]he conversion of grassland and undeveloped areas to cumulative development, within the San Joaquin Valley, *may* increase effects on protected wetland habitats." RPEIR at 4.4-33 and 4.4-34 (emphasis added). Here too, in direct violation of CEQA, the RPEIR fails to provide any specific analysis as to the effect that cumulative development would have on habitat loss for special-status species, or riparian or wetland habitats, yet concludes such impacts would be significant. RPEIR at 4.4-33.

C1-53 cont.

The RPEIR includes a laundry list of mitigation measures (Mitigation Measures BIO-1.1 through BIO-1.4, Mitigation Measures BIO-2.1 through BIO-2.3, and Mitigation Measures BIO-3.1 through BIO-3.2) and concludes that cumulative impacts to biological resources would be less than significant. But here too, the RPEIR makes no attempt to explain how these mitigation measures would reduce the General Plan's cumulative effects. To conclude, as the RPEIR does, that an impact is less than significant, substantial evidence must demonstrate that mitigation measures will reduce an impact to a less-than-significant level. Substantial evidence consists of "facts, a reasonable presumption predicated on fact, or expert opinion supported by fact," not "argument, speculation, unsubstantiated opinion or narrative." Pub. Res. Code § 21080(e)(1)-(2). Because the RPEIR's conclusion of insignificance is premised on unsupported assumptions, it fails far short of this threshold.

D. Energy Impacts

The RPEIR purports to assess the General Plan's cumulative energy impacts by evaluating development within the PG&E service area, which encompasses 70,000 square miles. RPEIR at 4.6-36. However, the RPEIR fails to conduct any actual analysis. Instead, the RPEIR asserts that development within the General Plan Planning Area would be required to adhere to policies in the General Plan and concludes that future development in the Planning Area would not contribute to cumulative impacts. RPEIR at 4.6-36. This approach fails. As an initial matter, the RPEIR only refers to impacts from the General Plan itself; it makes no attempt to evaluate cumulative energy impacts from the General Plan together with cumulative development.

C1-54

Second, the RPEIR concludes that the General Plan's energy impacts would be less than significant asserting that the City would comply with General Plan policies. But once again, the RPEIR fails to provide the evidentiary support that such policies would effectively reduce impacts. For example, the RPEIR refers to one policy—Policy RC-8-b—which, "includes targets for reducing residential and non-residential electricity use." RPEIR at 4.6-36. However, this Policy does not actually require that any action be taken. Rather, it calls for the city to "strive" to reduce per capita electricity use by developing and implementing incentives and promoting alternative energy sources. RPEIR at 4.3-33. A policy calling for the City to strive to reduce electricity use is meaningless as it does not provide a firm commitment to take action. Nor does

the policy include any type of performance standards that would provide concrete criteria for success. Thus the RPEIR may not rely on this policy to conclude that the General Plan's cumulative energy impacts would be less than significant.

Third, the RPEIR's analysis does not comply with CEQA's requirement that agencies first determine whether cumulative impacts to a resource are significant, and then determine whether a project's impacts are cumulatively considerable (i.e., significant when considered in conjunction with other past, present and reasonably foreseeable projects). CEQA Guidelines § 15064(h)(1). The RPEIR skips the first step and focuses only on the second. This error causes the document to underestimate the significance of the Project's cumulative impacts because it focuses on the significance of the Project's impacts on their own as opposed to considering them in the context of the cumulative problem. It is wholly inappropriate to end a cumulative analysis on account of a determination that a project's individual contribution would be less than significant. Rather, this should constitute the beginning of the analysis.

C1-54 cont.

E. Hydrology and Water Quality Impacts

The RPEIR's discussion of cumulative hydrology and groundwater impacts gives the impression that it assesses cumulative effects from other projects in the area. RPEIR at 4.10-35. Yet, the document never identifies those projects. Consequently, although the RPEIR asserts that operations of these (unidentified) other projects would increase impervious surfaces and increase stormwater runoff rates, it fails to provide any factual analysis to allow for a determination as to whether this runoff would degrade water quality in the area.

In addition, the RPEIR does not adequately analyze cumulative impacts due to groundwater pumping. The RPEIR acknowledges that Kings Subbasin is in overdraft condition and that if the City does not continue to implement programs, a significant impact would occur. RPEIR at 4.10-36. Yet, the RPEIR never does the hard work of identifying the other projects that are contributing to the overdraft condition. Nor does it analyze the specific consequences to the Kings Subbasin of this overdraft (e.g., severity of localized cones of depression, the effects of changes in groundwater flow direction, the potential for increased concentrations of contaminants, and the specific effects of land subsidence). Here too, the RPEIR lists several mitigation measures (HYD-2.1, HYD-3.1, HYD-3.2, HYD-3.3, HYD-3.4, and HYD-3.5) and concludes that cumulative hydrology and water quality impacts would be less than significant. RPEIR at 4.10-36. Yet, the document fails to describe the nature of these measures or explain how these measures would protect against overdraft. Therefore, the RPEIR lacks support that the measures would reduce impacts to a less than significant level.

C1-55

F. Water Supply Impacts

Similar to the RPEIR's analysis of cumulative energy impacts, the RPEIR determines that the General Plan's cumulative water supply impacts would be less than significant because water supplies would be adequate to serve buildout of the General Plan. The RPEIR fails to even mention, let alone identify, water demand from cumulative development and fails to provide any information about the adequacy of water supplies in the region, including for domestic well users impacted by City and regional groundwater usage. Consequently, the RPEIR lacks support for its conclusion that cumulative water supply impacts would be less than significant.

C1-56

XII. The EIR Fails to Identify a Reasonable Range of Potentially Feasible Alternatives

C1-57

An EIR must consider a reasonable range of potentially feasible alternatives that would avoid or lessen a project's potentially significant effects.14 C.C.R. § 15126.6(a). "The core of an EIR is the mitigation and alternatives section." *Watsonville Pilots Association v. City of Watsonville* (2010), 183 Cal.App.4th 1059, 1089. Alternatives must be able to implement most project objectives, though they need not implement all of them. 14 C.C.R. § 15126.6; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 CA4th 477, 489. The range of alternatives required in an EIR are those that are necessary to permit a reasoned choice. 14 C.C.R. § 15126.6(f). The scope of alternatives reviewed must be considered in light of the nature of the project, the project's impacts, relevant agency policies and other material facts. *Rancho Palos Verdes v. City Council* (1976) 59 Cal. App. 3d 869, 891. The "purpose of an alternatives analysis is to allow the decision maker to determine whether there is an environmentally superior alternative that will meet most of the project's objectives." *Watsonville Pilots Ass'n*, 183 Cal.App.4th at 1089.

In evaluating only the "No Project Alternative" and the Net Zero Energy Consumption Alternative, the City has failed to meet CEQA's standards for its alternatives analysis. Courts have made clear that the "No Project Alternative" is not in fact an "alternative" pursuant to the CEQA Guidelines, since the No Project Alternative by default does not advance the Project's objectives. The City therefore effectively evaluates only one alternative, the Net Zero Energy Consumption Alternative, despite the fact that the Project will guide all development in Fresno through 2056 and will have far reaching environmental impacts long beyond that time. For a project of this scale and impact, the evaluation of just one alternative is unreasonable.

Further, the one alternative the City does analyze does not meet CEQA's requirements for a legally adequate alternative. First, the Net Zero Energy Consumption Alternative is not feasible or reasonable, because it consists of a requirement with a deadline which has already passed – the achievement of net zero energy consumption by both residential and non-residential development by 2020. DPEIR, 6.5.1; Pub. Res. Code § 21061.1 (defining "feasible" as "capable of being accomplished in a successful manner..."). Second, the Net Zero Energy Alternative fails to reduce or avoid significant environmental effects based on the DPEIR's own findings. The DPEIR finds that the Project would not result in potentially significant impacts related to energy or Greenhouse Gas Emissions. DPEIR, 6.5.2. Nevertheless, the DPEIR identified the Net Zero Energy Consumption Alternative as the Environmentally Superior Alternative since it "has the least impact to the environment because it would result in few impacts related to energy and greenhouse gas emissions". *See* DPEIR, 6.6. The selection and consideration of the Net Zero Energy Consumption Alternative is inconsistent with CEQA, since it will not reduce a significant impact, as acknowledged by the City. Thus, the City must identify other alternatives that potentially will avoid or lessen a significant effect of the project.

The City's failure to analyze a reduced development alternative compounds the inadequacy of the DPEIR's alternatives analysis. The Net Zero Energy Consumption Alternative is explicit that, other than the requirement that all development achieve zero net energy by 2020, "[all other components of the approved General Plan would remain in effect." DPEIR, p. 6-6. The alternative specifies that "new development would occur using new development practices," but that "development would still occur consistent with the policies of the approved General

C1-57 cont.

Plan. DPEIR, p. 6-7. The Net Zero Energy Alternative and therefore the DPEIR's alternatives analysis does not include a reduced development component. And the RPEIR does not include an alternatives analysis, because the City did not modify the DPEIR's alternatives analysis. Moreover, the DPEIR does not consider or propose any changes to its Development Code lessen the severity of the impacts of new industrial development, including on vulnerable disadvantaged communities and sensitive receptors. Such changes considered in an alternative could include the reduction in the intensity of land use types allowed within certain zone districts or near sensitive receptors or the addition of discretionary permit requirements for certain industrial uses likely to have significant environmental impacts.

The City's failure to include a reduced development alternatives analysis is particularly significant, because Leadership Counsel requested that the City consider such an alternative in its May 2020 comments. Leadership Counsel May 2020 comments, pp. 3, 4, 21. Specifically, the letter requested that the City analyze alternatives to industrial land use designations avoid and minimize significant environmental and public health impacts on South Fresno neighborhoods. Leadership Counsel even included a map as an attachment to its letter that provided sample alternative land use designations in South Fresno which would achieve this objective.[59] The City's preparation and consideration of such an alternative would be consistent with guidance by the Attorney General Xavier Becerra's encouraging proactive planning to avoid conflicts between industrial districts and residential communities. "Land use designation and zoning decisions should channel development into appropriate areas," including away from sensitive receptors. Attorney General Xavier Becerra, Stat of California Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, p. 3.[60]

C1-57 cont.

An EIR is required to consider those alternatives that will "attain most of the basic objectives" while avoiding or substantially reducing the environmental impacts of the project. A reduced development alternative may be required where it is capable of avoiding or substantially lessening any significant effects of the project," even if it "would impede to some degree the attainment of the project objectives. *Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1058, 1088-1089 (General Plan EIR was inadequate where it failed to consider a reduced development alternative that would have met most general plan objectives and would have reduced environmental impacts attributable primarily to growth itself). A reduced development alternative which replaces heavy industrial land use designations with less intensive, non-industrial designations with land use designations that meet community needs directly surrounding existing residential and other sensitive neighborhood uses would achieve the CEQA requirement that alternatives considered avoid or substantially reduce the project's significant environmental impacts. In particular, the enactment of buffers between residential neighborhoods and industrial development could substantially reduce a variety of significant

[59] That map is available on the City's webpage for the South Central Specific Plan at the following link: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2020/06/Community-Revision-Map.pdf, accessed on May 10, 2021.

[60] Available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, access on May 8, 2021.

impacts identified in the DPEIR, including but not limited to aesthetic, light, noise, air pollution, public health, traffic, and greenhouse gas emissions, among others. Importantly, such a reduced development alternative would reduce health impacts on vulnerable populations in pollution-burdened South Fresno neighborhoods who would be subjected to fewer environmental impacts.

Additionally, a reduced development alternative that creates buffer zones around sensitive land uses while leaving remaining industrial land use designations in place would achieve all of the Project's goals and objectives and further many of them more than the General Plan with its existing land use designations. Among the General Plan's seventeen goals, some of the goals that this alternative would actively further include the following (discussion by author is in italics):

Goal 3. Emphasize conservation, successful adaptation to climate and changing resource conditions, and performance effectiveness in the use of energy, water, land, buildings, natural resources, and fiscal resources required for the longterm sustainability of Fresno. (General Plan, p. 1-6)

Creating buffer zones between residences and other sensitive land uses will stabilize neighborhoods and promote their long-term sustainability by reducing adverse impacts from industrial land uses. By preserving the quality and long-term viability of existing housing, the alternative promotes resource conservation. The alternative also supports climate adaptation by reducing heat impacts from large warehouse and industrial development on sensitive land uses.

C1-57 cont.

Goal 4. Emphasize achieving healthy air quality and reduced greenhouse gas emissions. (General Plan, p. 1-6)

The RPEIR acknowledges that industrial development is a leading source of air pollution in Fresno. By reducing the scale of planned industrial development, the alternative promotes the achievement of both healthy air quality and reduced GHG emissions.

Goal 6. Protect, preserve, and enhance natural, historic, and cultural resources.

[This includes both designated historic structures and neighborhoods, but also "urban artifacts" and neighborhoods that create the character of Fresno. (General Plan, p. 1-6)

The General Plan currently designates entire neighborhoods and unique and culturally-important places of worship for industrial development. A few examples include the disadvantaged unincorporated community of Daleville, neighborhoods on East Central Avenue and East Malaga Avenue, the Sikh Gurdwaras Nanaksar Sahib, and the Thai Buddhist Temple Wat Brahmacariyakaram, all located in South Central Fresno. By planning for the elimination of these places, the General Plan undermines

Goal 6. The reduced development alternative proposed by Leadership Counsel, on the other hand, would actively promote this goal.

Goal 8. Develop Complete Neighborhoods and districts with an efficient and diverse mix of residential densities, building types, and affordability which are designed to be healthy, attractive, and centered by schools, parks, and public and commercial services to provide a sense of place and that provide as many services as possible within walking distance. (General Plan, p. 1-6)

The land use map proposed by Leadership Counsel replaces industrial land use designations around sensitive uses with commercial and office space. These designations respond to resident priorities articulated at workshops held by the City for the development of the South Central Specific Plan, where residents requested that the City plan for uses to meet basic community needs, including fresh food, retail, health services, and green space. These land use types would also meet the needs of the thousands of workers already employed within the SCSP area, allowing both residents and workers to meet day-to-day needs without reliance on car travel.

Goal 9. Promote a city of healthy communities and improve quality of life in established neighborhoods. (General Plan, p. 1-6)

C1-57 cont.

The further concentration of industrial land uses in and around South Fresno neighborhoods, as proposed by the General Plan, will undermine public health and quality of life in neighborhoods which bare the brunt of their environmental impacts. Alternatively, a reduced development alternative with buffer zones which facilitate commercial, retail, health care and other establishments that meet community needs promotes healthy communities and would improve quality of life in South Fresno neighborhoods which lack basic services and amenities.

Goal 11. Emphasize and plan for all modes of travel on local and Major Streets in Fresno. [Facilitate travel by walking, biking, transit, and motor vehicle with interconnected and linked neighborhoods, districts,...shopping centers and other service centers...] (General Plan, p. 1-7)

Planning for neighborhood-serving land uses in South Fresno residential areas will reduce residents' dependence on travel by car. By redesignating industrial land use designations around sensitive uses, it will also promote walking and biking by reducing truck traffic in the area and improving pedestrian and cyclist safety.

Goal 13. Emphasize the City as a role model for good growth management

planning,...effective urban development policies, environmental qualities, and a strong economy...

By balancing industrial growth with the safeguarding of existing residential communities and cultural resources, the alternative would advance Goal 13.

Goal 16. Protect and improve public health and safety.

Goal 17. Recognize, respect, and plan for Fresno's cultural, social, and ethnic diversity, and foster an informed and engaged citizenry.

South Fresno neighborhoods which the General Plan designates for industrial development are disproportionately comprised of Latino, Black, Asian American residents, households which speak languages other than English, and immigrants compared to the City as a whole. A reduced development alternative which plans for the continuation of these neighborhoods, not their elimination, and for the basic resources they need to thrive better aligns with Goal 17's directive that the City "[r]ecgonize, respect, and plan for Fresno's cultural, social, and ethnic diversity".

C1-57 cont.

In addition, a reduced development alternative that creates buffer zones while still including significant industrial land use designation aligns with Goal 1 ("Increase opportunity, economic development, business, and job creation) by creating a range of job development opportunities with industrial employers as well as commercial, retail and other employers which could serve both community and industrial worker needs. Furthermore, a land use redesignation alternative is clearly feasible as it can be accomplished through the City's legal authority to do so.[61]

Finally, the DPEIR fails to "identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination" as required by Section 15126.6(c). The only explanation the City provided for selecting only two alternatives is that "given the set of specific changes that the project is proposing for the approved General Plan, a reasonable range of alternatives is limited". *See* DPEIR, 6.2. As explained elsewhere in this letter, an accurate description of the Project includes the General Plan and the entire duration of its implementation, not only the revisions to the General Plan to which the City wishes to limit its environmental review. Regardless, the DPEIR's explanation neither discloses whether other alternatives were in

[61] Our proposed alternatives would not constitute a "taking" pursuant to U.S. Constitutional law, an issue the City has raised in the past. The land use map we have proposed includes re-designation of certain land in the SIPA from industrial to commercial and office space uses, which allow parcels to retain at least some economic value.

fact considered, such as the reduced development alternative proposed in Leadership Counsel's May 2020 comments, or why the specific changes of the project limit the alternatives.

As such, the City must revise and recirculate the DPEIR to comply with CEQA's requirements for its selection and analysis of project alternatives.

C1-57 cont.

XIII. The DPEIR's and RPEIR's Inadequacies Together With the General Plan's Policies Promoting Industrial Development in South Fresno Neighborhoods Render Them Inconsistent with Fair Housing and Civil Rights Laws

As noted in all previous correspondence on the matter, the RPEIR's deficiencies violate state and federal fair housing and civil rights laws as codified in Cal. Gov. Code §§ 12900, et. seq., 11135, 65008, 8899.50; 42 U.S.C. § 2000d, et seq., 3601, et seq., 5304(b)(2)&(s)(7B), & 12075), and other applicable law. These deficiencies include the RPEIR's failure to acknowledge and fully analyze impacts which uniquely, acutely, and / or disproportionately burden lower income communities of color and non-English speaking populations; the RPEIR's failure to analyze project alternatives that would reduce or eliminate impacts that disproportionately impact lower income communities of color and non-English speaking populations; and the RPEIR's failure to identify and include adequate mitigation measures for the same. Thus, the DPEIR not only violates CEQA but results in violations of state and federal fair housing and civil rights laws which require the City to both avoid discrimination and to affirmatively further fair housing.

C1-58

XIV. Conclusion

For the foregoing reasons, we request that the City revise the DPEIR and RPEIR to correct the errors identified in this letter and recirculate the revised PEIR for public review and comment. The revised PEIR must thoroughly review the impacts from the entire lifetime of the General Plan and Development Code and consider all feasible mitigation measures and a reasonable range of alternatives to avoid and mitigate those impacts. In addition, we request that the City revise its GHG Reduction Plan to indicate that it does not meet the requirements for CEQA streamlining.

Please contact Ashley Werner at awerner@leadershipcounsel.org or (415) 686-1368 if you would like to set up a time to discuss these comments.

C1-59

Sincerely,





Ashley Werner
Directing Attorney
Leadership Counsel for
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Lucas Williams
Visiting Associate Professor of Law /Staff Attorney
Golden Gate University
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cc: Jennifer Clark, AICP, Director, Development and Resources Management Department
Mayor Jerry Dyer
Councilmember Esmeralda Soria, District 1
Councilmember Mike Karbassi, District 2
Councilmember Miguel Arias, District 3,
Councilmember Tyler Maxwell, District 4
City Council President Luis Chavez, District 5
Councilmember Gary Bredefeld, District 6
City Council Vice-President Nelson Esparza, District 7
Terry Hirschfield, Principle, Orange Center Elementary School
Samir Sheikh, Executive Director/APCO, San Joaquin Valley Air Pollution Control District
Scott Lichtig, Deputy Attorney General, California Department of Justice

ATTACHMENTS

Attachment 1: Shute, Mihaly, and Weinberger Comments on the City of Fresno General Plan FPEIR and GGRP, dated August 19, 2020

Attachment 2: Neal Liddicoat, Griffin Cover Transportation Consulting, PLLC, Comments on FPEIR, Fresno General Plan, dated August 7, 2020

Attachment 3: Neal Liddicoat, MRO Engineers, Review of "Transportation and Traffic" Analysis, DMEIR, General Plan and Development Code Update dated September 10, 2014

Attachment 4: Neal Liddicoat, Griffin Cover Transportation Consulting, PLLC, Comments on Recirculated Public Review DPEIR, Fresno General Plan, dated May 7, 2021

Attachment 5: Haseeb Qureshi, Urban Crossroads, Inc., Northpointe Building 31 Trip Generation and Impact Assessment

Attachment 6: Fresno CalEnviroScreen 3.0 Results

Attachment 7: CalEnviroScreen 3.0 Excel Results (Abridged)

Attachment 8: South Central Neighbors United v. City of Fresno, et al. (2018), Petition for Writ of Mandate

Attachment 9: Seth Shonkoff, et al, The Climate Gap: Environmental health and equity implications of climate change and mitigation policies in California - a

review of the literature 2011

Attachment 10: Chandrakala Ganesh, PhD, et al., Climate Change, Public Health, and Policy: A California Case Study, AJPH Policy, 2017

Attachment 11: Shute, Mihaly, and Weinberger Comments on the Draft MEIR for the Draft General Plan and Development Code Update for the City of Fresno, dated October 8, 2014

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August 19, 2020

Via E-Mail

Council President Arias and Councilmembers
City of Fresno
2600 Fresno Street
Room 2097
Fresno, CA 93721

Re: *City of Fresno General Plan Final Program Environmental Impact Report and Greenhouse Gas Reduction Plan (SCH # 2019050005)*

Dear Council President Arias and Councilmembers:

This firm represents Leadership Counsel for Justice and Accountability ("Leadership Counsel") in matters relating to the Program Environmental Impact Report ("PEIR") for the City of Fresno's 2014 General Plan ("General Plan"). Leadership Counsel submitted comments on the Draft PEIR on May 5, 2020. *See* Response to Comments at Comment Letter C-3; C-69 to C-123. Unfortunately, the PEIR's Response to Comments does little to address the concerns raised in that letter. Chief among these are deficiencies in the PEIR's project description, and its inadequate analysis and mitigation of the Project's significant air quality and transportation impacts, including impacts to public health. The PEIR is also seriously deficient in its analysis of impacts from greenhouse gas (GHG) emissions and mitigation of those impacts. In light of these flaws and others previously raised by Leadership Counsel, the PEIR continues to fall far short of the requirements of the California Environmental Quality Act ("CEQA") (Public Resources Code section 21000 et seq.) and CEQA Guidelines (California Code of Regulations, title 14 section 15000 et seq.). Moreover, the City's updated GHG Reduction Plan ("GHG Plan"), which would serve as its climate action plan, fails to meet the requirements of CEQA Guidelines section 15183.5, and cannot be used to support streamlined project-level GHG analysis.

This is not the first time the City Council has been asked to certify an EIR for this General Plan. The City adopted its current General Plan in 2014, with a 2035 planning horizon and a 2056 buildout date. The General Plan set a blueprint for development in

Fresno for decades to come, one that would prevent the City from significantly improving air quality or aggressively reducing GHG emissions, and which would set in motion acute deterioration of many Fresno residents' quality of life. In particular, it planned for the transformation of South Fresno residential communities into sites for massive industrial warehouses and distribution centers, with high volumes of commercial truck traffic crisscrossing neighborhood streets and interfering with residents' enjoyment and access to their homes, places of worship, and community-serving businesses and amenities. These neighborhoods are already some of the most pollution burdened not just in the city, but in the entire state, and are disproportionately home to people of color, immigrants, and people whose first language is not English.

In 2014, the City prepared a Master Environmental Impact Report (MEIR) for its update to the City's General Plan and the Development Code, which was "prepared to evaluate the potential environmental impacts associated with the implementation" of these documents. Draft MEIR at 1-1 and 1-2. This law office prepared comments on the Draft MEIR, emphasizing the gravity of the General Plan's proposed changes and the MEIR's lack of adequate analysis of associated environmental impacts. That letter detailed how, in numerous instances, the MEIR failed to thoroughly assess impacts deemed to be significant and unavoidable and to identify all feasible mitigation measures to reduce the severity of the impacts. *See* Shute, Mihaly & Weinberger LLP Oct. 8, 2014 comment letter re Draft MEIR, Attachment 1 to this letter. It highlighted these flaws with regard to transportation impacts, air quality and associated public health impacts, greenhouse gas emissions, and noise. The City nevertheless certified the MEIR and adopted the General Plan in 2014 without seriously addressing those concerns. And since then, as described below, South Fresno neighborhoods have already begun to suffer the impacts of the City-approved of the industrialization of their communities.

Now, just six years after certifying the MEIR for the General Plan, the City has drafted a Program EIR for the already-approved General Plan.[1] The PEIR is an entirely new, largely rewritten environmental impact report. In some instances it imports text

[1] The PEIR omits any environmental review of the impacts of implementing the City's Development Code. It justifies this by noting that "[t]he project is not amending the Development Code, and the environmental analysis that was conducted when the Development Code was adopted was adequate." Response to Comments at 3-74. This is an unsatisfactory explanation, and is generally inconsistent to the PEIR's approach to environmental review of the General Plan – the Project only proposes to amend the Mobility and Transportation Element of the General Plan, yet the PEIR addresses more than just transportation impacts.

from the MEIR but also has original text, and reaches similar – but not entirely the same – conclusions about environmental impacts from and needed mitigation for the General Plan's implementation.[2] Yet the PEIR never explains exactly how it stands in relationship to the MEIR. The PEIR describes itself as a "conversion" of the General Plan's "previously-certified MEIR to a PEIR." PEIR at 1.2. This would suggest simply a shift in format from one type of environmental impact report – a master EIR – to another one – a program EIR. Yet, as described below, the PEIR simultaneously insists that it is *not* in fact an EIR for the entire period of General Plan implementation, but rather an EIR for the "*continued* implementation of the approved General Plan." PEIR at 1-2 (emphasis added). The PEIR never explains what this means. However, given that the PEIR employs a 2019 baseline, it presumably refers to the fact that the PEIR only analyzes impacts from the General Plan's implementation from 2019 onward, and not the impacts of the entire lifetime of the General Plan starting in 2014.

This uncertainty and confusion about the status of the PEIR and MEIR, and the scope of the project that the PEIR must review, infects the entire document. The PEIR appears to take advantage of this uncertainty, seeming to claim at times that it need not fully review certain impacts of General Plan implementation because the General Plan has already been adopted. *See, e.g.* Response to Comments at 3-78 (declining to review the impacts of General Plan land use policies because those policies were adopted in 2014). The PEIR also declines to consider recommending revisions to the General Plan in order to address and reduce environmental impacts. To justify this, it references the artificially-imposed constraint that the City only contemplates limited edits to the General Plan regarding vehicles miles travelled ("VMT"), even though additional revisions might in fact be necessary to fully mitigate for environmental impacts of General Plan implantation. *See e.g.*, Response to Comments at 3-50. This, along with the PEIR's significant flaws in analysis, as described in the Leadership Counsel May 5, 2020 letter and below, render the PEIR inadequate and incompliant with CEQA. As a result, the City must recirculate and revise the PEIR to address these deficiencies before it can consider certification, and must not close off consideration in the PEIR that revisions to the General Plan might be needed to mitigate for significant environmental impacts from the General Plan's implementation.

Additionally, as noted in Leadership Counsel's correspondence of May 5, 2020, the various deficiencies in the PEIR have a negative and disproportionate impact on

[2] Because the PEIR carries forward many of the same defects as the MEIR, we renew the October 8, 2019 comments our firm made on the MEIR, and apply them to the PEIR. That comment letter and its exhibits appear as Attachment 1 to this letter.

communities of color. Accordingly, the proposed action to approve the Project and certify the associated PEIR violates state and federal civil rights laws, in addition to the California Environmental Quality Act.

I. The PEIR's Flawed Project Description and Improper Baseline Conflict with CEQA's Mandate to Review the Impacts of the "Whole of an Action" and Undermine the Entire PEIR.

An EIR must accurately and consistently describe the project it analyzes. CEQA Guidelines § 15124; Guidelines § 15378 (defining "project"); *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-3 ("An accurate, stable, and finite project description is the sine qua non of an informative and legally sufficient EIR."). An inaccurate or incomplete project description undermines CEQA's purposes because it thwarts a full analysis of project impacts, thus minimizing the project's effects. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656. Thus, when an EIR gives "conflicting signals to decision-makers and the public about the nature and scope of the activity being proposed," the courts have found it "fundamentally inadequate and misleading." *San Joaquin Raptor Rescue Center*, 149 Cal.App.4th at 655-56.

As Leadership Counsel emphasized in its May 5, 2020 letter, the PEIR's description of the project is conflicted, confusing, and raises doubts about the nature of the action. Response to Comments 3-74 to 77. The PEIR explains that the project consists of two discretionary approvals: an update to the City's GHG Plan and limited updates to the text of the approved General Plan to reflect changes in statutes and regulations related to Vehicle Miles Traveled (VMT). Draft PEIR at 1-2. But the PEIR also notes that the project includes "converting the previously-certified MEIR to a PEIR" and updating "technical analyses to reflect the current baseline conditions of 2019" "for the continued implementation of the approved General Plan." *Id*. at 1-2. The Staff PowerPoint posted on the City's website for the August 20, 2020 City Council meeting continues to frame the project in this disjointed manner. For clarity, this letter's references to the "Project" includes this entire suite of actions, even though, as discussed further below, some of these actions are not technically a project subject to CEQA review.

The City's description of the Project poses several problems. First, the PEIR is an environmental document. Its purpose is to *evaluate* the environmental impacts of a project and set mitigation measures for them; by definition it therefore cannot be a *part* of a project. To assert otherwise confuses environmental review itself with the subject of that review.

Second, it sows doubt about the scope of environmental impacts from General Plan implementation that the PEIR does and should review. When the PEIR describes itself as a conversion of the General Plan MEIR (*see, e.g.* Draft PEIR at 3-5), it necessarily claims to be an EIR for the whole of the implementation of General Plan. But then, in direct contradiction, it describes itself as the environmental document for "the *continued* implementation of the approved General Plan," (Draft PEIR at 3-5, emphasis added) i.e., presumably the EIR for only one segment the General Plan's implementation, from 2019 onward. The PEIR's Response to Comments fails to meaningfully address Leadership Counsel's concerns about the PEIR's contradictory stances on its purpose and scope; it essentially restates the text from the Draft PEIR that the Leadership Counsel letter critiqued. Response to Comments 3-74 to 3-78.

Equally concerning, the PEIR's *Master Response: Project Description and Baseline Conditions* suggests that the PEIR need not give full review to impacts from implementation of the General Plan's land use policies, because no amendments are currently being proposed to those policies. It states:

> "The General Plan, as a whole, is not being considered to be re-adopted. The City is not modifying the City's current land use plan, and the proposed project does not result in any direct physical changes or new land uses. . . . Any previous changes to the land use plan, including General Plan amendments, adoption of Specific Plans, and approval of various projects throughout Fresno, have already been evaluated under CEQA, as applicable, and those changes, by definition do not result in any new potential environmental impacts to be considered or evaluated as part of the proposed project." Response to Comments at 3-3.

The Response to Comments makes similar assertions in its responses to portions of Leadership Counsel's letter on the PEIR's failure to adequately analyze or mitigate the General Plan's impacts, such as land use-related impacts. *See, e.g.,* Response to Comments at 3-70, 71, 72, 74, 78, 80. This selective approach to reviewing the General Plan's impacts is inexplicable, even under the approach of only analyzing "continuing impacts" of General Plan implementation. The General Plan's land use policies will be implemented, and their effects felt, over the next several decades. Under the PEIR's logic, the PEIR would not need to review potential impacts associated with any General Plan elements for which no amendments are proposed. To the extent that the PEIR takes this approach regarding other potential impacts, its analysis of those impacts is incomplete and in violation of CEQA.

In characterizing the Project as "continued implementation of the approved General Plan" rather than the implementation of the full General Plan over its lifetime,

and picking and choosing which impacts of General Plan implementation to review, the PEIR fails to describe the whole of the action. A fundamental premise of CEQA is that a lead agency must consider the environmental impacts of the whole of the action being approved, not segmented pieces. CEQA Guidelines § 15378(a) (defining "project"). CEQA prohibits segmentation of a project. *See Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1229 ("when one activity is an integral part of another activity, the combined activities are within the scope of the same CEQA project" and must be analyzed together); Guidelines § 15378(a) ("'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."); *see also* CEQA Guidelines § 15378(c) (term "project" means the whole of the "activity which is being approved"). Because the statute requires study of "the whole of an action," CEQA prohibits public agencies from "subdivid[ing] a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole." *Orinda Assn. v. Bd. of Supervisors* (1986) 182 Cal.App.3d 1145, 1171. Breaking the project into smaller sub-projects will lead to inadequate environmental review. *See, e.g., City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1452 (citation omitted) (CEQA "mandates 'that environmental considerations do not become submerged by chopping a large project into many little ones'" which, individually, may have lesser environmental effects but which together may be "disastrous.").

Here, the "whole of the action" is the full period of the General Plan's implementation, starting at its adoption in 2014. Yet the PEIR, by resetting the baseline at 2019, and claiming to only review the General Plan's "continued implementation," incorrectly truncates that review. This approach improperly segments the environmental review for one general plan between two different EIRs. Doing so has the effect of ignoring the impacts of the substantial industrial development that has already occurred under the General Plan to date. Further, it risks minimizing the significance of impacts from proposed projects that might tier off of the PEIR's environmental analysis. When using a 2019 baseline, and not the baseline from the time of General Plan adoption, impacts from projects that have come online since General Plan adoption are absorbed into the new baseline.

This is evident, for example, in the PEIR's baseline for air quality emissions analysis, as measured by levels of criteria pollutants in different areas of the City. The 2015 to 2018 air quality baseline, which undergirds the PEIR's air quality analysis, is markedly worse than the 2009 to 2012 baseline applied in the MEIR. PEIR at 4.3-6 to 4.6-7; MEIR at 5.3-4 to 5.3-6. This decrease in air quality is not a surprise. Since the

2014 General Plan was adopted, large-scale industrial facilities have begun to proliferate in South Fresno, just as the General Plan allows. The California Attorney General's Office highlighted the impacts of this development in an August 2, 2019 comment letter on the City's preparation of the South Industrial Area Specific Plan. That letter noted that "[i]n the past few years, Fresno has approved over 5 million square feet of industrial warehouse space along E. Central Avenue" and that this industrial development has resulted in "thousands of associated truck trips visiting these warehouses daily." *See* California Attorney General August 2, 2019 letter to City of Fresno re City of Fresno's South Industrial Priority Area Specific Plan at 10, Attachment 2 to this letter. That letter details the significant increase in air pollutants brought about by several of these projects, projects the City approved under Mitigated Negative Declarations on the basis that they would not have significant environmental impacts. Attorney General's Letter at 11-12.

One of the implications of this skewed baseline is that project-level analysis of cumulative impacts will also be skewed. Specifically, as a result of this decrease in air quality, when new projects come up for review, their contributions to cumulative air emissions will be evaluated against a baseline for air quality that is already substantially deteriorated, making the project's emissions contributions appear artificially low compared to existing conditions.

The PEIR's failure to describe and analyze the entire project, including implementation of both the General Plan and the Development Code over their entire life cycles, violates CEQA and results in an inaccurate impacts analysis that significantly underestimates the project's impacts. The PEIR does not look at the impacts for the project as a whole, because it zeros out six years of development under the General Plan, and six years of negative impacts for the community. The PEIR must use the predevelopment baseline to fully account for all environmental impacts occurring as a result of the General Plan as drafted. To do otherwise minimizes the General Plan's impacts. At the same time the PEIR cannot assert that environmental review of certain impacts is unnecessary because the underlying General Plan has already been adopted. On that premise, the PEIR could skip over or shortchange review of almost any environmental impact, which would entirely defeat the purpose of conducting environmental review. The PEIR must be revised to correct these deficiencies.

II. General Comments.

The following are our general comments on the legal inadequacies of the PEIR. More specific comments on individual sections of the document follow.

A. The PEIR Improperly Attempts to Avoid Analysis and Mitigation of the General Plan's Impacts by Concluding That They Are Significant and Unavoidable.

Where all available and feasible mitigation measures have been proposed, but are inadequate to reduce an environmental impact to a less-than-significant level, an EIR may conclude that the impact is significant and unavoidable. *See* CEQA Guidelines § 15126.2. If supported by substantial evidence, the lead agency may make findings of overriding considerations and approve the project in spite of its significant and unavoidable impacts. *Id.* at §§ 15091, 15093. However, the lead agency cannot simply conclude that an impact is significant and unavoidable and move on. A conclusion of residual significance does not excuse the agency from (1) performing a thorough evaluation and description of the impact and its severity before and after mitigation, and (2) proposing *all* feasible mitigation to "substantially lessen the significant environmental effect." CEQA Guidelines § 15091(a)(1); *see also id.* § 15126.2(b) (requiring an EIR to discuss "any significant impacts, *including those which can be mitigated but not reduced to a level of insignificance*" (emphasis added). "A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely." 1 Stephen Kostka & Michael Zischke, *Practice Under the California Environmental Quality Act* § 14.6 (2d ed. 2008).

The PEIR finds that the City's plans for future growth and development as set out in the General Plan will result in significant and unavoidable impacts in multiple topic areas. Draft PEIR at 1-9 to 1-46. As detailed below, in numerous instances, the PEIR fails to thoroughly assess impacts deemed to be significant and unavoidable and/or fails to identify all feasible mitigation measures to reduce the severity of the impacts.

B. The PEIR Fails to Analyze the Impacts of All Development That Could Occur as a Result of Buildout under the General Plan.

The General Plan acknowledges the harmful effects of unrestricted growth in the City, including increased reliance on personal automobile use and the inability to provide efficient public transit service to new development, which leads to increased air pollution and greenhouse gas emissions. General Plan at 3-6, 3-7, and 7-7. Yet, the General Plan proposes land use policies that fail to limit development in future growth areas. Specifically, the General Plan includes objectives and policies that address growth by "promoting" development in certain parts of the City. (*See*, e.g., Objective UF-12 directing the City to locate *roughly* one half of future residential development in infill areas; and PEIR at 4.3-28 emphasis added.) However, the General Plan is unclear regarding the definitions for terms such as "roughly" and "approximately" as applied in

the Plan. Specifically, the General Plan states that use of these terms is intended to be flexible so that depending on context, a reference to "approximately one-half" could vary at least 10 to 15 percent and use of the term "roughly" could include twice that amount or more. General Plan at 1-30. These vague definitions have important implications when applied to planning policy.

For example, General Objective UF-12 directs the City to locate "roughly one half" of future residential development in infill areas. But given the General Plan's flexible definition of the word "roughly," anywhere from 20 percent to over 80 percent of future development could occur in infill areas. General Plan at 1-28 and 1-29. Such "infill" developments in the city have included several sprawl developments, including city islands, east of Highway 180 bordering Clovis and west of Highway 99. However, the PEIR presents only one set of estimates for the amount of anticipated development at build-out. *See* Draft PEIR Table 3-3. Thus, the PEIR fails to disclose its assumptions for the amount of infill used (*i.e.*, 20 percent, 50 percent, or 80 percent of development in infill areas at build-out) for the analyses of the Project's environmental impacts. Given that the Plan allows a broad range of development to occur outside of infill areas, the PEIR must evaluate potential impacts that would occur if only 20 percent of anticipated future development were to take place in identified infill areas, or better yet, revise General Objective UF-12 to ensure the majority of future development occurs in infill areas and define infill areas with sufficient precision to promote reduced automobile travel. If the majority of Project-related growth takes place outside the identified infill areas, Project impacts related to transportation, air quality and greenhouse gases would be much worse than the PEIR indicates. These impacts would be even more severe in disadvantaged communities that are already over-burdened with pollution and inadequate access to transit.

C. The PEIR Ignores Feasible Mitigation, Such as Changes to the Land Use Designations and Densities and Intensities Proposed in the General Plan.

For several of the General Plan's significant and unavoidable impacts, notably the Project's significant impacts related to greenhouse gas emissions, the PEIR fails to consider all feasible mitigation. The PEIR never considers changes to land use designations or densities and intensities as potential mitigation even though such changes could significantly reduce greenhouse gas emissions and other significant impacts disclosed in the PEIR. CEQA requires the EIR to consider such mitigation.

The City cannot approve projects with significant environmental impacts if any feasible mitigation measure or alternative is available that will substantially lessen the

severity of any impact. Pub. Res. Code § 21002; CEQA Guidelines § 15126(a). The City is legally required to mitigate or avoid the significant impacts of the projects it approves whenever it is feasible to do so. Pub. Res. Code § 21002.1(b). "In the case of the adoption of a plan, policy, regulation, or other public project [such as the General Plan], mitigation measures can be incorporated into the plan, policy, regulation, or project design." CEQA Guidelines § 15126.4(a)(2). Mitigation is defined by CEQA to include "[m]inimizing impacts by limiting the degree or magnitude of the action and its implementation." CEQA Guidelines § 15370(b). In addition to proposing new "policies" as mitigation, mitigation should include changes in where development is planned, what kind is planned, and how dense or intense that development is planned to be, *i.e.*, changes to the land use diagram and land use designations.

There is no indication that the PEIR considered modifications to land use designations or densities and intensities to mitigate the impacts of the General Plan. This omission is surprising given that those changes are the easiest, most effective, and most obvious ways to lessen or avoid many of the General Plan's impacts. For example, the Plan has resulted, and will continue to result in, locating a substantial amount of new industrial uses in close proximity to existing and proposed residential areas. Draft PEIR at Figure 3-5 Growth Areas; General Plan Implementation Element Figure IM-2. This will in turn result in increased exposure of sensitive receptors, especially disadvantaged communities, to substantial pollutant concentrations. Draft PEIR at 4.3-57 and 58. As explained in previous comments, exploring alternative land use scenarios would go a long way toward reducing numerous significant General Plan impacts identified in the PEIR, and with the MEIR before it, such as air quality, public health, climate change, traffic, and noise.

D. The PEIR Cannot Rely on Unenforceable and Noncommittal General Plan Policies to Mitigate the Project's Significant Impacts.

Mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions, agreements, or other legally binding instruments. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2). The PEIR relies on a number of General Plan policies to mitigate significant environmental impacts. *See*, for example, Draft PEIR at 4.3-47, 4.3-55, 4.3-59. Many of these General Plan policies and programs are vague, optional, directory, or otherwise unenforceable.

For example, the Plan fails to provide enforceable policies that direct orderly growth. Instead, the Plan includes policies that call for "promoting" development in certain parts of the City. *See*, e.g., Policy LU-1-a (directing the City to *promote* development within the existing City Limits and in infill areas); Policy LU-1-c (directing

the City to *promote* order land use development in pace with public facilities and services needed to serve development) (emphasis added). These vague and unenforceable policies fail to describe how the City will promote and enforce an orderly growth process and fail to ensure that infill development will occur prior to development in the Growth Areas. General Plan Implementation Element at 12-30.

A other examples of ineffective mitigation—out of numerous instances—include the following (emphases added):

- Policy RC-8-c: Energy Conservation in New Development. *Consider* providing an incentive program for new buildings that exceeds California Energy Code requirements by fifteen percent. Draft PEIR at 4.3-33.

- Policy RC-8-j: Alternative Fuel Network. *Support* the development of a network of integrated charging and alternate fuel stations for both public and private vehicles, and *if feasible*, open up municipal stations to the public as part of network development. *Id*. at 4.3-34.

- Policy LU-2-b: Infill Development for Affordable Housing. *Consider* a priority infill incentive program for residential infill development of existing vacant lots and underutilized sites within the City limits as a strategy to help to meet the affordable housing needs of the community. *Id*. at 4.6-15.

- Policy LU-6-b: *Consider* adopting commercial development guidelines to assure high quality design and site planning for large commercial developments, consistent with the Urban Form policies of this Plan. *Id*. at 4.6-16.

- Policy LU-1-e: Annexation Requirements. *Consider* implementing policies and requirements that achieve annexations to the City that conform to the General Plan Land Use Designations and open space and park system, and are revenue neutral and cover all costs for public infrastructure, public facilities, and public services on an ongoing basis. *Id*. at 4.10-10.

- Policy LU-2-a: Infill Development and Redevelopment. *Promote* development of vacant, underdeveloped, and redevelopable land within the City Limits where urban services are available by *considering* the establishment and implementation of supportive regulations and programs. *Id*. at 4.11-11.

- Policy D-4-b: Incentives for Pedestrian-Oriented Anchor Retail. *Consider* adopting and implementing incentives for new pedestrian-friendly anchor retail at intersections within Activity Centers and along corridors to attract retail clientele and maximize foot traffic. *Id*. at 4.6-17.

- Policy D-4-f: Design Compatibility with Residential Uses. *Strive to ensure* that all new nonresidential land uses are developed and maintained in a manner complementary to and compatible with adjacent residential land uses, to minimize interface problems with the surrounding environment and to be compatible with public facilities and services. *Id*. at 4.1-10 and 11.

A general plan's goals and policies are necessarily general and aspirational. The City may rely on such policies to mitigate environmental impacts under CEQA, however, only if they will be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. *See Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 358 (citing *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 377). CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1186-87; *Fed'n of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.

Here, the General Plan's vague, unenforceable, and noncommittal policies and programs (and policies for which no implementation programs are identified) allow the City to take no action and thus fail to mitigate impacts. As a result, the PEIR cannot ensure that the policies relied on as mitigation measures will ever in fact be implemented. Therefore, they cannot serve as CEQA mitigation. *See Anderson First*, 130 Cal.App.4th at 1186-87.

III. The PEIR's Analysis of and Mitigation for the General Plan's Transportation Impacts is Factually and Legally Deficient.

The Leadership Counsel's May 5, 2020 letter alerted the City to deficiencies in the PEIR's analysis of the General Plan's transportation impacts, relating both to VMT and impacts on pedestrians, cyclists, and transit riders. The PEIR's Response to Comments fails to respond to those concerns, and the PEIR's transportation analysis continues to contain numerous defects that must be remedied if the public and decisionmakers are to fully understand the General Plan's potential effects.

A. The PEIR Fails to Adequately Analyze Impacts Relating to VMT and Lacks Support for Its Conclusion That Impacts Relating to VMT Would Be Less than Significant.

The PEIR's analysis of the General Plan's effect on VMT is deficient because it fails to document its assumptions relating to existing and General Plan-related VMT, and because it lacks support for its conclusion that the General Plan's VMT-related impacts would be less than significant.

The Draft PEIR identifies existing (2019) VMT and VMT under the General Plan in 2035. *See* Table 4.16-2: County and City of Fresno VMT, Draft PEIR at 4.16-40. However, it is not sufficient to simply identify these numbers without providing information about how the City arrived at these estimates. Meaningful analysis of impacts effectuates one of CEQA's fundamental purposes: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123. To accomplish this purpose, an EIR must contain facts and analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 568. An EIR's conclusions must be supported by substantial evidence. *Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 409.

As transportation engineer Neal Liddicoat with Griffin Cove Transportation Consulting ("GCTC") explains, the brevity of the VMT discussion in the Draft PEIR is a function of the "black box" analysis procedure involved. *See* GCTC Report, August 7, 2020, Attachment 3 at 1. The VMT analysis was completed entirely within the Fresno Council of Governments Regional Travel Demand Model (also referred to as the "Activity-Based Model"). As such, the background assumptions and detailed analysis steps are unknown and it is impossible for the public and decisionmakers to determine whether the VMT estimates are accurate. *Id*.

This error is particularly serious because Liddicoat informed the City of this precise problem with the 2014 Master EIR's transportation analysis. (*See* September 10, 2014 Letter from N. Liddicoat, MRO Engineers to C. Borg, Shute, Mihaly & Weinberger, LLP at 5, Exhibit A to Attachment 1 to this letter: "No information is provided in the DMEIR with regard to the specific input parameters that were used in developing the theoretical thresholds applied in the LOS analysis, whether for freeways or any of the other roadway types presented. Consequently, it is impossible to judge whether the analysis is credible and, moreover, whether the LOS results are valid.").

The PEIR's Response to Comments attempts to address this deficiency when it asserts that the VMT projections were calculated using the Fresno COG Model and directing the reader to a link to the Fresno Council of Governments and to the Technical Appendix. Response to Comments at 3-82. This approach does not cure the deficiencies in the PEIR. The City may not scatter relevant information through an EIR (or send the public to a generalized link to an agency) and then demand that the public locate, collate, and then analyze it to obtain vital information. Much to the contrary, CEQA obligates the agency to present the information in an accessible manner. As the California Supreme Court put it in *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 443, "The question is [] not whether the project' s significant environmental effects *can* be clearly explained [in a brief], but whether they *were* explained in the EIR." (emphasis in original).

The Draft PEIR errs further by concluding, absent the required evidentiary support, that the General Plan's VMT-related impacts would be less than significant. Draft PEIR at 4.16-42. Indeed, the PEIR's conclusion is directly contrary to the analysis within the Draft PEIR which states that the increase in VMT from the General Plan *would* constitute a significant impact. (*See* Draft PEIR at 4.16-41, "Because the measures of VMT in per capita and per employee increase with the City's General Plan (2035) compared to existing (2019) conditions, it is determined that continued implementation of the approved General Plan may be considered to result in a significant impact related to State CEQA Guidelines Section 15064.3 subdivision (b), analyzing transportation impacts consistent with SB 743."). Indeed, we concur that a plan that would more than double VMT from 9,395,800 to 19,883,400 would undoubtedly result in a significant impact. *See* Response to Comments at 3-36 Comment A2-19.

The Draft PEIR arrives at its "less than significant" conclusion merely because the City had not yet adopted thresholds of significance. *See* Draft PEIR at 4.16-42. Yet a lack of a threshold of significance is not a sufficient basis for determining that a project's impact is less than significant.

There are additional defects in the City's approach. First, the City erred by publishing an EIR without thresholds of significance. Significance thresholds are of critical importance as CEQA's most basic purpose is to inform governmental decisionmakers and the public about the potential significant environmental effects of a proposed project. CEQA Guidelines § 15002(a)(1). Determining whether a project may result in a significant adverse environmental effect is one of the key aspects of CEQA. Guidelines § 15064(a) (determination of significant effects "plays a critical role in the CEQA process"). CEQA specifically anticipates that agencies will use thresholds of significance as an analytical tool for judging the significance of a project's impacts. *Id.* §

15064.7. The determination of significance "is critical, because once 'significant effects' have been identified in the EIR, an agency must explore feasible mitigation measures or alternatives to avoid or reduce the effect." *See Berkeley Keep Jets Over the Bay Committee v. City of Oakland* (2001) 91 Cal.App.4th 1344, 1373. Thus, one of the first steps in any analysis of an environmental impact is to select a threshold of significance. The Draft PEIR's failure to contain a threshold of significance for the General Plan's substantial increase in VMT leads to a cascade of other failures: without a threshold, the PEIR cannot do its job. Specifically, although the PEIR demonstrates the General Plan would result in a significant increase in VMT, it failed to identify mitigation for this impact.

Second, the Draft PEIR may not rely on its failure to adopt a threshold of significance to claim impacts would be less than significant in light of clear evidence to the contrary. Agencies may not rely exclusively on a lack of significance threshold for a finding of insignificant impacts if other substantial evidence in the record demonstrates that the project may actually cause significant impacts. *Communities for a Better Env't v. California Resources Agency* (2002) 103 Cal.App.4th 98, 112-13 (thresholds of significance cannot be used as binding standards that foreclose the use of other evidence to demonstrate that a project may have significant effects); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109 ("in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met"). Clearly, the Draft PEIR should have disclosed that the General Plan would result in a significant impact related to its increase in VMT. The Draft PEIR should have then been recirculated.

Apparently recognizing the flawed approach in the Draft PEIR, the Response to Comments makes a futile attempt to correct this error. The Response to Comments notes that the City adopted VMT guidelines and thresholds in June 2020 to be effective on July 1, 2020. Response to Comments at 3-81. These guidelines, entitled "CEQA Guidelines for Vehicle Miles Traveled Thresholds for the City of Fresno," June 18, 2020 ("VMT Guidelines") include thresholds of significance for land use plans. *Id.* Specifically, the VMT Guidelines identify the following methodology and significance threshold for land use plans: "compare the existing VMT per capita and/or VMT per employee for the region with the expected horizon year VMT per capita and/or VMT per employee for the land use plan. *If there is a net increase in the VMT metric under horizon year conditions, then the project will have a significant impact*." VMT Guidelines at 38 (emphasis added).

Yet, rather than evaluate the increase in VMT from the General Plan against the significance thresholds established in the VMT Guidelines, the Final EIR promises to

apply the newly adopted VMT thresholds of significance the *next time* the City updates its General Plan. Response to Comments at 3-82, 3-83. The Final EIR then changes its reason as to why the Plan would not result in a significant impact relating to VMT increases, but even here the document is inconsistent. First it asserts that "with the adoption of Policy MT-2-m, the City will use VMT as the criteria for transportation impacts as the City continues to implement the approved General Plan. Therefore, impacts related to VMT are considered [less than significant] at this time." Response to Comments at 3-84. Yet Policy MT-2-m will do nothing to reduce VMT impacts from the Plan as it simply sets forth the City's policy to use VMT (as opposed to level of service) as the criteria for evaluating transportation impacts for CEQA review. Draft PEIR at 3-8. A policy that requires the City to study VMT does nothing to ensure that impacts will be less than significant.

Second, the Response to Comments asserts that with implementation of the VMT Guidelines, impacts related to VMT would be reduced to a less than significant level through mitigation measures identified in the VMT Guidelines that include measures such as improving or increasing access to transit, implementing employer-based trip reduction programs, and increasing development density. Response to Comments at 3-84. While the VMT Guidelines do include a list of mitigation strategies (*see* Table C), the PEIR includes no indication that these strategies would actually be adopted, let alone implemented. In short, the mitigation measures listed in the VMT Guidelines simply do not and cannot reduce to insignificance the increase in VMT caused by the General Plan. When a lead agency relies on mitigation measures to find that a project's impacts will be reduced to a level of insignificance, there must be substantial evidence in the record demonstrating that the measures are feasible and will be effective. *Sacramento Old City Assn. v. City Council of Sacramento*, 229 Cal.App.3d 1011, 1027 (1991); *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 726-29 (1990). There is no such evidence in the record for this Plan. In fact, to the contrary, the VMT Guidelines make clear that it may not even be feasible to mitigate a project's VMT impacts. (*See* VMT Guidelines at 40, stating the "practical implementation of these [VMT] strategies as formal CEQA mitigation measures in perpetuity is yet to be tested," and "[t]hese issues of regional scale, partial participation, and geographic ambiguity confound the certainty of the City's identification of VMT mitigation measures"; *see also* VMT Guidelines at 27).

The VMT Guidelines refer to the potential for regional VMT mitigation strategies such as mitigation banks, fees, and exchanges (VMT Guidelines at 41), yet the PEIR does not identify such banks, fees or exchanges or analyze how such strategies could effectively reduce the General Plan's VMT impacts.

In sum, the PEIR should be revised to disclose that the General Plan will result in significant impacts due to its increase in VMT. The revised document should then identify mitigation for these impacts. The PEIR notes that that given the increase in VMT under the General Plan, "it is recommended that when the City plans to update its General Plan Mobility and Transportation Element, it should strive to lower the General Plan (2035) VMT per capita compared to existing conditions." Draft PEIR at 4.16-41. However, the City may not update this Element again for decades. Given the gravity of the GHG and air quality impacts associated with high VMT, the PEIR must identify mitigation measures or General Plan alternatives that promote sustainable growth as a mechanism for reducing VMT.

B. The PEIR Fails to Disclose, Analyze, or Identify Feasible Mitigation Measures for the General Plan Implementation's Significant Impacts on Pedestrians, Cyclists, or Transit Riders.

As noted in Leadership Counsel's May 5, 2020 Draft PEIR comment letter, the PEIR does not contain information on or analysis of how implementation of the General Plan would affect pedestrians, cyclists, or public transit riders. The PEIR in fact states explicitly that it "does not consider potential impacts on walking, biking, and transit. Pedestrians, bicyclists, transit riders are all users of the roadway system but may not be fully recognized in the traffic operations analysis and the calculation of LOS." Draft PEIR at 4.16-4. The PEIR's Response to Comments points to General Plan goals and policies pertaining to pedestrians, cyclists, and transit rides (Response to Comments at 3-85), but as noted in Leadership Counsel's May 5, 2020 letter (*id.*), this approach does not substitute for an analysis of General Plan implementation's direct impact on pedestrians, transit riders, and cyclists, nor can it suffice as mitigation for those not-yet analyzed impacts. During public meetings held by the General Plan Implementation Committee, staff presentations have disclosed that, six years in to General Plan implementation, many of the General Plan policies have not yet been implemented. Reliance on the existence of policies is insufficient.

The Response to Comments asserts that the proposed project ultimately does not include any environmental changes resulting in impacts to cyclists, pedestrians, or transit users. *Id*. It therefore appears to contend that the environmental impacts of an already-adopted General Plan policy need not be analyzed. But this would improperly limit the scope of environmental review, which includes impacts of implementing the General Plan, including impacts that implementation of the General Plan's environmental and policy changes will have on multimodal transportation users.

The PEIR's Response to Comments also points to the adopted Active Transportation Plan (ATP). *Id*. However, as the Leadership Counsel noted in its May 5, 2020 letter, the ATP is not incorporated into the General Plan, does not address the General Plan's unspecified and unanalyzed impacts, and operates as a guidance document that aids the City in choosing from an extensive list of projects when applying for regional, state, and federal dollars to invest in active transportation projects throughout the City. *Id*. There is no mandatory duty to implement the ATP and there is no required methodology for choosing projects, much less projects that will mitigate the impacts of this project. Of particular importance, the ATP has no projects proposed to be developed in the ATP's priority network for the city's south central areas where industrial land uses are planned, sited, and under development and includes very few projects proposed in the "build-out" (presumably secondary) phase for this area. The price tag on the priority network is approximately $90 million which makes the possibility of investment in the build out phase (and thus south central Fresno) elusive. Accordingly, the PEIR's identification of the ATP as justification of lack of pedestrian or cyclist impacts is insufficient.

Land use changes in the project area, specifically siting and development of industrial land uses in the south central region of the city and in areas within the sphere of influence, have and will significantly impact and worsen walking and biking conditions for residents. Since the siting and development of several facilities in this area, including facilities developed since General Plan adoption, residents in the neighborhood have noticed an astronomical increase in low and heavy duty vehicles as the cumulative traffic each of these facilities attracts thousands of more trips than before. *See Warehouses Are Headed for the Central Valley Too*, The New York Times, July 22, 2020, Attachment 4 to this letter; *Will Fresno put the brakes on an industrial park project? Some residents hope so*, The Fresno Bee, January 11, 2019, Attachment 5 to this letter; *Judge grants state attorney general intervention in Fresno environmental justice lawsuit*, The Fresno Bee, July 12, 2018, Attachment 6 to this letter.

Recent industrial installations have made it much more unsafe for students walking to Orange Center Elementary and residents trying to stay active in their neighborhoods in south central Fresno, as increased traffic volume and speeds increasingly impact streets already deficient in pedestrian facilities. The community of Calwa and the surrounding areas of southeast Fresno have also been impacted by recent developments including a parking facility for Amazon delivery vans. The facility increases traffic congestion and pollution levels, exacerbating already unsafe conditions for students walking to school and bus stops, and for parent volunteers who help usher younger children to school.

IV. The Draft PEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.

A. The Draft PEIR Fails to Support its Conclusion that the Project Will Not Violate Applicable Air Quality Plans.

One of the PEIR's thresholds of significance for Air Quality, AQ-1, looks at whether the "proposed project would [] conflict with or obstruct implementation of the applicable air quality plan." In reviewing the project's potential impacts in this regard, the PEIR lists several Air Quality Plans ("AQPs"), including the Assembly Bill 617: Community Emission Reduction Plan ("AB 617","CERP"). However, it does not go beyond a simple description of the CERP, and fails to address the role of the City and General Plan in ensuring consistency with the goals and policies of the recently adopted CERP. Both the Leadership Counsel's letter, and a letter from the San Joaquin Valley Air Pollution Control District, noted the Draft PEIR's failure to provide an analysis of the General Plan's consistency with the CERP. Response to Comments at 3-55, 56.

The PEIR's Response to Comments states that the City "will continue the planning efforts related to the CERP," but goes no further. *Id*. at 3-87; *see also id*. at 3-55, 56. And the Response to Comments also declines, for example, to consider suggestions from the San Joaquin Valley Air Pollution Control District that revisions be made to the General Plan to discuss a heavy-duty truck rerouting study from the adopted CERP, noting that "approved General Plan at this time are limited to specific changes related to VMT and compliance with recent legislative updates." *Id*. at 3-59.

The CERP covers an area that includes large swaths of southwest, southeast, south central, and central Fresno. This area was chosen as a result of the atrocious air pollution and the unfair burden low-income communities of color in these areas of the city bear, and the urgent need to respond to historical inequities in these communities. Antithetical to these efforts, however, is the City continuing to zone parts of these same areas—south central, southeast, and the downtown regions—for nearly all of the city's heavy industrial development. Attachment 7 to this letter includes a map identifying these overlapping efforts.

The CERP itself is unequivocal that its purpose is to reduce pollution in the designated south Fresno area. While the San Joaquin Valley Air Pollution Control District ("Air District") leads CERP implementation, the City has a critical role in supporting CERP implementation and emission reduction. Several policies and commitments in the CERP implicate the City of Fresno's participation, yet none of these policies and commitments have made their way into either the General Plan or the PEIR,

and the PEIR does not analyze whether implementation of the General Plan would be consistent with these policies. Some of the most relevant policies and commitments in the CERP that require municipal coordination include:

- HD.11: Heavy Duty Truck Rerouting
- C.5: Incentive Program for Educational Training for Electric Vehicle Mechanics
- LU.2: Provide Assistance During the California Environmental Quality Act Process
- LU.3: Provide Education and Outreach on Available Tools for Public Information Regrading Land Use Projects
- LU.4: Collaborating to Enhance Community Participation in Land Use Processes
- FD.2: Street Sweeping
- Strengthened working relationship between the Air District and agencies that have land use and transportation authority in South Central Fresno, including development of a Memorandum of Understanding or other appropriate mechanisms for coordination.

The PEIR has not demonstrated, nor can it support, a basis for its conclusion that the General Plan is consistent with the AQPs listed or furthers the goals and commitments in the CERP.

B. The PEIR's Analysis of the Health Impacts Associated with the Project's Air Quality Impacts is Deficient.

The PEIR's analysis (or lack thereof) of the connection between the project's likely air emissions and health impacts falls far short of the standards set by CEQA. The PEIR's failures include: 1) failing entirely to acknowledge potential health impacts on certain vulnerable populations, and 2) dismissing the possibility of assessing the health impacts of criteria air pollutants emitted as a result of General Plan implementation, without providing adequate justification. These failures and the PEIR's resulting lack of mitigation to address the health impacts associated with the project's criteria air pollutant emissions will disproportionately harm people of color, low-income Fresnans, the elderly and children who are most susceptible to air pollution, as well as disadvantaged

communities in and near the Planning Area which are designated for new industrial development.

The PEIR does not assess the strong correlation between air pollution, disparate impacts on Black and Latino populations, and coronavirus disease ("COVID-19"). An unprecedented infectious disease, the 2019 novel coronavirus is a newly identified disease that has caused illness in millions of people worldwide. At the time of the PEIR's release in March 2020, widespread transmission of the novel coronavirus was a recent development in Fresno and most other California counties, and the extent of its impact was still unknown. As time has passed and the coronavirus continues to ravage communities worldwide, including communities in Fresno, local and state agencies better understand the impacts and vulnerabilities associated with the virus, including the extent to which polluted air increases susceptibility to the virus and the severity of its impacts.

The American Lung Association has ranked the Fresno area as the most polluted metro area in the nation from PM 2.5 by calculating the average year-round concentration. *See* American Lung Association press release re 'State of the Air' report, April 21, 2020, Attachment 9 to this letter. A Harvard study found that an increase of only 1 $\mu g/m^3$ in PM 2.5 is associated with an increase of eight percent death rate from COVID-19. *See* Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study, Xiao Wu & Rachel C. Nethery, et al., Department of Biostatistics, Harvard T.H. Chan School of Public Health, posted April 27, 2020, Attachment 8 to this letter. Moreover, COVID-19 has disproportionately infected and killed more Latino and disproportionately killed more Black people in the United States, and has disproportionately killed and infected Latinos in Fresno County. Fresno County COVID-19 Data and Surveillance Dashboard, Covid-19 Deaths Race-Ethnicity, and Cases by Race and Ethnicity, accessed August 18, 2020, Attachments 10 and 11 to this letter. These disproportionate impacts of COVID-19 on people of color, and the disproportionate share of Latino and Black residents that live in South Fresno neighborhoods raise particular concerns as to the PEIR's failure to assess and mitigate air quality and health impacts, and failure to assess the disproportionate impacts of this failure on people of color, especially in the context of COVID-19.

V. The PEIR Fails to Adequately Analyze and Mitigate for the General Plan's Greenhouse Gas Emissions, and the GHG Plan Cannot Qualify as a CEQA Streamlining Document.

Reducing GHG emissions to minimize the harms from climate change is one of the most urgent challenges of our time. Scientific evidence continues to mount that we are not only facing a true climate crisis, but also rapidly running out of time to confront

it. The City of Fresno and the surrounding region face mounting risks from climate change, including wildfire, precipitation extremes (GHG Plan at 2.7 to 2.8), drought, decreased water supply, and worsening air quality (*see Climate Change, Public Health, and Policy: A California Case Study*, American Journal of Public Health, C. Ganesh & J. Smith, April 1, 2018, Attachment 12 to this letter). The residents of Fresno therefore have a direct and immediate interest in swift and decisive climate action at all levels of government. Further, the law is clear that lead agencies must thoroughly evaluate a project's impacts on climate change under CEQA, and identify and adopt feasible mitigation measures to address project-specific or cumulative impacts. *See Communities for a Better Env't v. City of Richmond* (2010) 184 Cal.App.4th 70, 89-91; CEQA Guidelines § 15064.4.

The City's preparation of the PEIR and update to its GHG Plan, included as Appendix G to the Draft PEIR and incorporated into the General Plan, offer an important opportunity to aggressively reduce emissions, including from VMT, which contributes significantly to climate disruption in Fresno. GHG Plan at ii. Unfortunately, the City is effectively passing up this opportunity with its proposed GHG Plan and associated PEIR.

The GHG Plan relies largely on vague, nonbinding policies from the General Plan to reduce GHG emissions, and fails to provide data to support its conclusion that compliance with these policies would be sufficient meet the state's GHG emission reduction mandates. These polices are essentially the same as those relied on in the 2014 GHG Plan. Further, the GHG Plan applies such a vague approval process for a project to tier off of the GHG Plan that it provides no assurance that tiered projects will reliably reduce GHG emissions though project design. With these deficiencies, the GHG Plan cannot serve as a "qualified" climate action plan under CEQA Guidelines section 15183.5, i.e. one that can be used as a "threshold of significance" for evaluating the climate impacts of future discretionary projects.

The PEIR likewise relies on implementation of these same vague, optional General Plan policies to mitigate the impacts of greenhouse gas emissions from General Plan implementation. Finding that GHG emissions from implementation might nevertheless have potentially significant climate change impacts, the PEIR asserts that these emissions can be mitigated to less than significant levels with a single mitigation measure: for new development projects subject to discretionary review are to show consistency with the GHG Plan and its CEQA Project Consistency Checklist. *See* Mitigation Measure GHG-1.1, Draft PEIR at 4.8-45. Efficacy of this measure is unsupported by substantial evidence, and cannot be relied upon given the vague framework for project-level GHG reductions laid out in the GHG Plan. The PEIR also lacks evidence to support its conclusion that the General Plan is consistent with

applicable plans, policies, and regulations adopted to reduce GHG emissions. Draft PEIR at 4.8-46, 47.

A. The City's GHG Plan Fails to Ensure Reduction of GHG Emissions and Cannot be Relied on for Tiering under CEQA Guidelines § 15183.5.

Where a public agency's climate action plan meets the requirements in CEQA Guidelines section 15183.5, compliance with that plan may be used to mitigate cumulative levels of GHG emissions within a jurisdiction to a less-than-significant level, and allows development project tiering from the plan. CEQA Guidelines § 15185.3. Such plans must do all of the following: (1) make an inventory of greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; (2) set a reduction target, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; (3) forecast projected emissions for activities covered by the plan; (4) specify reduction measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the reduction target; and (5) establish a mechanism to monitor the plan's progress toward achieving reduction targets.

The City's GHG Plan fails to meet all of these requirements. In particular, it omits 2050 as a target reduction year, which leaves the City without information on whether adequate reductions, under General Plan and other local policies, will be possible in later years. The Plan also lacks substantial evidence that its reduction measures, taken largely from the General Plan, are capable of achieving reduction targets. Further, it provides only vague direction for how a project tiering off of the GHG Plan would comply with the plan, undermining the GHG Plan's ability to ensure project-level emissions reduction.

1. *The Baseline Inventory of GHG Emissions Is Incomplete and Inaccurate.*

The baseline inventory of City GHG emissions is the foundation of the GHG Plan. Without a complete and accurate inventory, the City cannot accurately project future business-as-usual ("BAU") emissions or measure the effectiveness of reduction measures in meeting identified targets and goals. Effective policies cannot be built on a flawed inventory. Unfortunately, the City's GHG Plan inventory is incomplete and therefore inaccurate. The GHG Plan omits certain types of emissions without justification. For example, the GHG Plan states that it did not include emissions sources that comprise less

than 3 percent of the emissions inventory. GHG Plan at 3-1. The GHG Plan gives no further details and no explanation or basis for this arbitrary omission.

Similarly, the inventory specifically omits emissions from large industrial sources that are subject to California Air Resources Board's (CARB) reporting regulations and to Cap-and-Trade regulations. *Id*. In other words, only emissions from smaller sources are counted in the baseline inventory, while emissions from larger permitted sources are ignored. However, by subtracting permitted industrial emissions from the baseline inventory, the GHG Plan presents in inaccurate description of existing conditions. CEQA Guidelines § 15125(a).

The City's GHG Plan and PEIR fail to disclose these emissions, analyze their impacts, or identify feasible measures to ensure emission reductions over the life of the Plan. The result is a GHG Plan that presents flawed baseline data of GHG emissions that undermines the entire planning process. Without an accurate baseline inventory, the PEIR presents an inaccurate description of the existing setting and its projected future emissions have no evidentiary basis. Inasmuch as the City permits the activities resulting in emissions, the City has an obligation to disclose these emissions. The failure to do so renders the GHG Plan fatally flawed. A revised Plan must correct this flaw and include a comprehensive inventory of all emissions.

2. *The GHG Plan's Emission Forecasts Should Extend to 2050.*

The GHG Plan states that the "approved General Plan and GHG Plan Update ensure that the City of Fresno will do its part of reducing GHG emissions for the short-term (2020) and the long term (2050)." GHG Plan at 1-8; PEIR at 4.8-48. Yet the GHG Plan, as well as the PEIR, forecast emissions only for the years 2020, 2030, and 2035. The forecast does not go to 2050. GHG Plan at i; Draft PEIR at 4.8-48.

The PEIR asserts that a forecast farther into the future is unnecessary. It states that "[a]lthough the General Plan growth rate would result in buildout by the year 2056, given current methods and the State's goals and targets, 2035 is a reasonable forecast for GHG and is in-line with the State emission reduction targets." Draft PEIR at 4.8-45. This approach is inadequate. First, the GHG Plan notes that one of the goals of converting the MEIR to a PEIR is to "extend[] the life of the Fresno General Plan and the accompanying environmental document by up to 10 years." GHG Plan at 1-2. To the extent that this means extending the lives of these documents 10 years past 2035, until 2045, a forecast farther into the future is essential to establish that the General Plan's policies are capable of reducing emissions in line with state mandates over the entire life of the General Plan.

Further, because buildout under General Plan extends to 2056 (GHG Plan at 2-2; PEIR at 4-2, 4.8-32) the GHG Plan should have forecast emissions to implement the plan until at least 2050. As drafted, the document considers at most only 20 years' worth of emissions—a small fraction of the time over which General Plan impacts will be felt, a Plan that sets in place land use patterns leading to emissions for decades to come, long after 2035. This time horizon fails to provide the public with a meaningful assessment of the Project's long-term impacts. The GHG Plan should have accounted for, and the PEIR should have analyzed, GHG emissions at least through the year 2050. Only then could the PEIR analysis determine if implementation of the General Plan and other local GHG reducing policies is consistent with the long-term emissions reductions targets for climate stabilization articulated in AB 32 and California's 2017 Climate Change Scoping Plan. The statewide reduction goals set forth in in the Scoping Plan call for reducing emissions levels to 80 percent below 1990 levels by the year 2050. Accordingly, 2050 is the minimum appropriate planning horizon for analyzing annual emissions of a long-term project such as the City's General Plan.

Critically, meeting the statewide 2050 goals requires continuing and steady annual reductions in both total and per capita GHG emissions. *See* California's 2017 Climate Change Scoping Plan (excerpt), California Air Resources Board, April 1, 2018 at 18, Attachment 13 to this letter. Because state policy aims to steeply reduce GHG emissions over that same time period, it is imperative that the PEIR inform the public and decision-makers whether the General Plan implementation directly conflicts with the state's reduction goals. Of course, as mentioned above, that analysis should include the Project's anticipated emissions out to 2050. As the California Supreme Court has held, an agency "abuses its discretion if it exercises it in a manner that causes an EIR's analysis to be misleading or without informational value." *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 457. Here, neither the GHG Plan nor the EIR provide evidence that emissions reductions targets will be met.

3. *The GHG Plan Presents Vague Measures That Cannot Produce the Necessary Emission Reductions and Lacks Evidence of the Development of Implementation Programs.*

The GHG Plan's most fundamental weakness may be its failure to identify a set of GHG reduction measures that comes anywhere close to achieving the City's desired targets and goals. The GHG Plan offers only a vague assurance that the "GHG Plan Update ensures conformity with the mandates of California Supreme Court in the Newhall Ranch case and the State of California's latest GHG regulations" (GHG Plan Update at i) but fails to comprehensively address how it will "ensure conformity" and

does not demonstrate how these policies in the GHG Plan will reduce emissions by the amounts necessary.

Indeed, many of the GHG reduction measures collected in the GHG Plan from various elements of the General Plan represent vague, unenforceable, unquantifiable commitments to "encourage" or "promote" various actions (*see* Section V.B.1 below for specific examples). Although measures of this sort may be appropriate to supplement more concrete requirements, identification of specific, enforceable measures and quantification of resulting emissions reductions are required to demonstrate consistency with quantitative targets and goals. Enforceable, concrete commitments to mitigation also are required under CEQA. Neither the GHG Plan nor the PEIR contain adequate measures of this kind. Such measures are vital here given that the City needs tremendous reductions in emissions by 2035 and even greater reductions in 2050, particularly through reductions in VMT, to achieve state-mandated targets. The City will be unable to achieve these reductions through unenforceable policies.

In addition, although the GHG Plan states conclusions regarding projected levels of GHG emission reductions under the GHG Plan, it fails to provide evidentiary support for those conclusions. For example, that plan indicates that required emissions reductions are met for 2020, but provides no evidence that the GHG Plan policies will be enforceable and effective at meeting emission reduction targets. GHG Plan at 4-4. In addition, the GHG Plan concludes that the reductions will be met for 2030 and 2035, but again provides no evidence to support this conclusion. *Id*. at 5-31.

Meanwhile, the approval process and checklist the GHG Plan sets for individual development projects to qualify for CEQA streamlining is too undefined to ensure that projects will achieve necessary GHG reductions. This severely undermines the GHG Plan's ability to reduce emissions. This is especially serious given that the Plan relies largely on reducing emissions from new development because "[r]esidents of new development projects will achieve lower per capita rates than residents of existing development." GHG Plan at 1-8.

The Plan specifies a review process for proposed new developments subject to discretionary approval that are consistent with the underlying land use and zoning designations. Such projects would review the GHG Plan Update Consistency Checklist, and incorporate and implement design features or mitigation measures "as needed to demonstrate consistency." GHG Plan at 6-1, 2. The GHG Plan does not specify what these proposed projects must demonstrate consistency with. For example, if it is consistency with the Checklist itself, what would consistency with the Checklist entail? Adoption of one or more measures included on the Checklist? Adoption of all measures

included in the Checklist? This requirement is vague and unclear. Furthermore, the Checklist itself contains only a handful of measures, some of which are optional, or appear to already be required by state law or local policy. Checklist at 4, Appendix B to GHG Plan. Notably, the GHG Plan does not clarify how it will be determined if design features or mitigation measures will be "needed," and does not specify that all possible features or measures will be required. It further does not make clear whether a project may still take advantage of CEQA streamlining if it does not comply with all the measures on the checklist. *Id*. It is also unclear how the City will determine how a project is consistent with the Checklist given that not all the measures are mandatory. *Id*.

Meanwhile, the approval process for new discretionary industrial projects requiring a general plan amendment inexplicably excepts emissions from stationary sources from consideration in the significance determination. GHG Plan at 6-2. Neither the GHG Plan nor the PEIR provide any justification for omitting stationary sources from CEQA review for these projects. To ensure that future projects are adequately reviewed, all emissions, including stationary sources must be considered in the CEQA analysis.

4. *The GHG Plan Lacks a Reliable Mechanism for Monitoring Compliance.*

Under CEQA Guidelines section 15183.5, a qualifying plan must establish a mechanism to monitor the plan's progress toward achieving reduction targets. The City's GHG Plan does not meet this requirement. The Plan concedes that its implementation and monitoring steps are "suggested—not required" (GHG Plan at 7-1) even though the Plan states that "successful implementation of the GHG Plan Update will require implementation and monitoring." *Id*. The GHG Plan then states: "presently it would appear that without future State action the City would need to implement the local reduction strategies to reach its reduction targets for 2035." GHG Plan at 7-2. This casts doubt on the City's plans for implementing reduction strategies, yet according to other sections of the GHG Plan, the City must implement local reduction strategies regardless in order to meet reduction targets. GHG Plan at 3-31. This further underscores the need for a reliable monitoring mechanism.

5. *The GHG Plan Does Not Satisfy the Requirements for CEQA Streamlining and Must Be Revised to Indicate That.*

The GHG Plan allows for streamlined review for new projects subject to discretionary review and that trigger review under CEQA. GHG Plan at iv. As drafted, however, the GHG Plan falls far short of the requirements of CEQA Guidelines section 15183.5. In order to support a determination that climate action plan consistency

eliminates significant climate effects, a climate action plan must, among other things, clearly demonstrate that its prescribed measures will actually achieve the reductions necessary to attain the climate action plan's stated goals. CEQA Guidelines § 15183.5(b)(1)(D). As discussed above, the GHG Plan provides no basis for such a conclusion. The GHG Plan and the PEIR should therefore be revised to make explicit that the GHG Plan does not contain sufficient specific, enforceable GHG reduction measures to support streamlined CEQA review of future projects. Development projects in Fresno are already subject to great discretion regarding the level of applicable environmental review. *See, e.g.* Attorney General Letter at 11-12. The City cannot, in addition, allow most projects subject to discretionary review bypass GHG analysis under the GHG Plan.

B. The PEIR Fails to Adequately Analyze and Mitigate for the General Plan's Greenhouse Gas Emissions.

The PEIR, like the GHG Plan, concludes that implementation of the General Plan, along with implementation of other local policies, will enable the City to meet state-mandated GHG reduction targets. Draft PEIR at 4.8-44, 38. The City therefore relies on implementation of these policies to mitigate GHG emissions resulting from implementation of the General Plan.

Courts have clarified that an EIR is inadequate where proposed mitigation measures are so undefined that it is impossible to evaluate their effectiveness. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 79. Moreover, "[m]itigation measures must be fully enforceable through permit conditions, agreements, or legally binding instruments." CEQA Guidelines § 15126.4(a). The record must also contain substantial evidence of the measures' feasibility and effectiveness. *Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1027.

Unfortunately, the GHG mitigation identified in the PEIR fails to meet these standards. Many of the General Plan's policies and programs relied on to mitigate impacts related to GHG emissions are vague, optional, directory, or otherwise unenforceable, or lack evidence to support their assumptions. Emissions reductions cannot be assumed from such policies. A few examples—out of numerous instances—include the following:

- General Plan Objective UF-12. Directing the City to locate *roughly* one half of future residential development in infill areas (emphasis added). Draft PEIR at 4.8-18. However, the General Plan provides liberal definitions for terms such as "roughly" and "approximately" as applied in the Plan. It

states that use of these terms is intended to be flexible so that depending on context, a reference to "approximately one-half" could vary at least 10 to 15 percent and use of the term "roughly" could include twice that amount or more. General Plan at 1-30. Anywhere from 20 percent to over 80 percent of future development could occur in infill areas.

- General Plan Policy RC-5-c: GHG Reduction through Design and Operations. "*Promote* the expansion of incentive-based programs that involve certification of projects for energy and water efficiency and resiliency. . . . *Promote* appropriate energy and water conservation standards and facilitate mixed-use projects, new incentives for infill development, and the incorporation of mass transit, bicycle and pedestrian amenities into public and private projects." Draft PEIR at 4.8-27 (emphasis added).

- Building Energy Efficiency. "The City *encourages* developers to achieve the *voluntary* tier levels from the CPUC Energy Efficiency Strategic Plan, which ultimately lead to net zero energy consumption for residential development by 2020 and non-residential development by 2030." Draft PEIR at 4.8-42.

- General Plan Policy RC-8-b: Energy Reduction Targets. "Strive to reduce per capita residential electricity use to 1,800 kWh per year and non-residential electricity use to 2,700 kWh per year per capita by developing and implementing incentives, design and operation standards, promoting alternative energy sources, and cost-effective savings." Draft PEIR at 4.8-30.

- General Policy RC-8-c: Energy Conservation in New Development. "*Consider* providing an *incentive* program for new buildings that exceed California Energy Code requirements by fifteen percent." Draft PEIR at 4.8-30.

- Electric Vehicles. The PEIR states that based upon the historic trends in Electric Vehicle (EV) ownership and the CARB Zero-Emission Vehicles (ZEV) Action Plan, it is assumed that by 2030 EV ownership in the city would reach 8.7%, and by 2035, 13% of the vehicle trips would be made by EVs. Draft PEIR at 4.8-40, 41. The PEIR offers no evidence to support this assertion.

Moreover, although the PEIR purports to analyze impacts of the General Plan's continued implementation (Draft PEIR at 1-1), it fails to present evidence that the City has acted on these policies. The City has had six years since General Plan adoption to develop incentive programs and reduction measures, yet it present no evidence that any programs have been implemented. Therefore, the PEIR cannot conclude that the City will see the substantial emissions reductions from these policies necessary to meet state mandates.

Further, in concluding that General Plan implementation may directly or indirectly generate GHG emissions having significant environmental impacts and would result in significant cumulative GHG impacts, the PEIR relies entirely on Mitigation Measure GHG-1 to reduce these emissions to less than significant. Draft PEIR at 4.8-45, 47-48. Mitigation Measure GHG-1 requires new development projects subject to discretionary review to show consistency with the GHG Plan and its CEQA Project Consistency Checklist. Draft PEIR at 4.8-45. However, Mitigation Measure GHG-1 relies on consistency with the very policies, described above, from the General Plan and other local programs, that require little apart from consistency with existing regulations, or with vague and unenforceable measures. This approach fails for the same reasons as noted above. Permissible mitigation under CEQA must be binding or fully enforceable. The PEIR fails to present evidence applying Mitigation Measure GHG-1 will actually allow the City to meet GHG emissions reduction mandates.

There are numerous feasible mitigation measures the City could adopt to reduce the General Plan's GHG impacts. Some examples include:

- Create funding incentives for projects that conform to the General Plan and development approvals to smart growth and infill development standards such as LEED Neighborhood Development standards. Alternatively, the City could adopt a policy that it will not provide future funding for widening roadways to serve sprawl developments, but will instead prioritize funding for projects that serve development adjacent to or within already developed areas.

- Institute city-wide parking pricing policies.

- Adopt any number of policies that apply to new development within the City's jurisdiction. For example, it could:

    - Adopt an ordinance requiring payment of indirect source impact fees from development projects, similar to what the San Joaquin Valley

Air Pollution Control District requires in order to offset air pollution. The fee could be tailored to address traditional air pollution, toxic air contaminants, as well as GHG emissions.

- Adopt a policy conditioning funding of certain transportation projects on a demonstration that the project will reduce vehicle-miles traveled.

- Adopt a policy requiring publicly accessible electric vehicle charging stations to be installed at all new buildings (residential and commercial) with a parking lot larger than 10 parking spots.

- Offer fee reductions, waivers, loans or grants to developers and contractors who commit to verifiable green building practices that exceed state minimum standards. *See* Attachment 1, Exhibit K [Institute for Local Govt Best Practices] at 9.

- Provide incentives for new development projects to install home or business electric vehicle charging stations, alternative energy systems or energy efficiency upgrades. *See* Attachment 1, Exhibit K [Institute for Local Govt Best Practices] at 11.

- Review and adopt other policies such as those outlined in the Institute for Local Government's Best Practices guide. *See* Attachment 1, Exhibit K.

Even if the City cannot feasibly adopt some of these measures as part of its environmental review of the General Plan, it certainly can commit to developing and adopting specific measures in the future, provided it includes proper performance standards that will guide it in developing the measures. *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099.

C. The PEIR's Conclusion that the Project Will Not Conflict with an Applicable Plan to Reduce GHG Emissions is Not Supported by Substantial Evidence.

The PEIR recognizes that the Project will have significant GHG-related impacts if it will conflict with an applicable plan, policy, or regulation that was adopted for the purpose of reducing the emissions of GHGs. Draft PEIR at 4.8-46. However, the PEIR

concludes that the Project will not conflict with any such plan, and therefore will not have a significant impact. *Id*. at 4.8-46 to 47. The PEIR's analysis on this point is flawed.

First, the PEIR concludes that the Project is consistent with state GHG reduction goals and with the CARB Scoping Plan, and asserts that implementation of the GHG Plan will allow will the City to meet the state's reduction targets. *Id*. Yet it appears to omit data supporting this conclusion. An EIR's conclusions must be supported by substantial evidence. *Laurel Heights Improvement Ass'n*, 47 Cal.3d at 409. And without presenting such evidence, the PEIR cannot ensure that the Project is consistent with state climate mandates.

Second, the PEIR fails to analyze the Project's consistency with the San Joaquin Valley Air Pollution Control District Climate Change Action Plan. Goal 3 of that plan, referenced in the PEIR, states: "Ensure that climate protection measures do not cause increases in toxic or criteria pollutants that adversely impact public health or environmental justice communities." PEIR at 4.8-15. The Project is inconsistent with this goal, and therefore with the District's plan, because it results in increases of both toxic and criteria pollutants in close proximity to, and in some cases directly within, low income communities and communities of color in Fresno already overburdened by pollution – environmental justice communities.

Finally, the PEIR fails to examine the Project's consistency with the San Joaquin Valley Air Pollution Control District's Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA. The Project, however, is inconsistent with this Guidance as well, where the Guidance finds that project-specific emissions are cumulative, and "that this cumulative impact is best addressed by requiring all projects to reduce their GHG emissions" Draft PEIR at 4.8-16. The PEIR does not generally "require" such project-specific reductions, and therefore could not be found consistent with the Guidance.

VI. Conclusion.

For the foregoing reasons, we request that the City revise the PEIR to correct the errors identified in this letter, and recirculate the revised PEIR for public review and comment. The revised PEIR must conduct a thorough review of impacts from the entire lifetime of the General Plan, and cannot fail to consider proposed mitigation measures simply because the General Plan has already been adopted. In addition, we request the City to revise its GHG Plan to indicate that it does not meet the requirements for CEQA streamlining.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Marlene Dehlinger



Carmen J. Borg, AICP, Urban Planner

ATTACHMENTS

Attachment 1: Shute, Mihaly & Weinberger LLP comment letter re Draft Master Environmental Impact Report for the Draft General Plan and Development Code Update for the City of Fresno, including Exhibits A-Q, October 8, 2014

Attachment 2: California Attorney General letter to City of Fresno re City of Fresno's South Industrial Priority Area Specific Plan, August 2, 2019

Attachment 3: Griffin Cove Transportation Consulting report, August 7, 2020

Attachment 4: *Warehouses Are Headed for the Central Valley Too.* The New York Times, July 22, 2020

Attachment 5: *Will Fresno put the brakes on an industrial park project? Some residents hope so.* The Fresno Bee, January 11, 2019

Attachment 6: *Judge grants state attorney general intervention in Fresno environmental justice lawsuit.* The Fresno Bee, July 12, 2018

Attachment 7:	Map showing AB 617 and South Central Specific Plan boundary lines
Attachment 8:	Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study, Xiao Wu & Rachel C. Nethery, et al., Department of Biostatistics, Harvard T.H. Chan School of Public Health, posted April 27, 2020
Attachment 9:	American Lung Association press release re 'State of the Air' report, April 21, 2020
Attachment 10:	Fresno County COVID-19 Data and Surveillance Dashboard, Covid-19 Deaths Race-Ethnicity, accessed August 18, 2020
Attachment 11:	Fresno County COVID-19 Data and Surveillance Dashboard, Cases by Ethnicity, accessed August 18, 2020
Attachment 12:	*Climate Change, Public Health, and Policy: A California Case Study*, American Journal of Public Health, C. Ganesh & J. Smith, April 1, 2018
Attachment 13:	California's 2017 Climate Change Scoping Plan (excerpt), California Air Resources Board, April 1, 2018

cc: lee.brand@fresno.gov; scott.lichtig@doj.ca.gov; samir.sheikh@valleyair.org

1276240.6

August 7, 2020

Ms. Laurel L. Impett, AICP
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, California 94102

Subject: ***Final Program Environmental Impact Report***
Fresno General Plan, Fresno, California

Dear Ms. Impett:

As requested, Griffin Cove Transportation Consulting, PLLC (GCTC) has completed a review of the transportation analysis completed with respect to the City of Fresno General Plan (Project) in Fresno, California. The General Plan is the subject of a Final Program Environmental Impact Report (FPEIR) prepared for the City. The FPEIR consists of two elements: the March 2020 Draft Program EIR (DPEIR) and the July 2020 Response to Comments document, both of which were prepared by LSA. The "Transportation" component of the FPEIR is primarily based on information presented in a traffic study presented in Appendix J to the document. (Reference: LSA, *City of Fresno General Plan Program EIR Traffic Impact Analysis*, February 2020)

Our review focused on the technical adequacy of these documents, particularly with respect to the analysis of vehicle-miles traveled (VMT).

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT REVIEW

1. The VMT analysis is presented on pp. 5-1 – 5-2 of the LSA traffic impact analysis in FPEIR Appendix J. An additional half-page summary of the analysis is on p. 6-1 of that document. The brevity of the VMT discussion in the FPEIR is a function of the "black box" analysis procedure involved. The VMT analysis is completed entirely within the Fresno Council of Governments (COG) Regional Travel Demand Model (also referred to as the "Activity-Based Model" or ABM). As such, the background assumptions and detailed analysis steps are unknown, and it is impossible to judge whether the results are reasonable. The model development process is described in detail in an August 30, 2018 Fresno COG report, but even review of this would likely not fully reveal the VMT estimation process.

2. As of the time the VMT analysis was prepared and the Draft PEIR published, the City of Fresno had not adopted a standard of significance regarding VMT. The Draft PEIR says [p. 4.16-40]:

   > *The City has not yet established thresholds related to VMT. Once VMT thresholds are established by the City, the project impacts would be evaluated against established thresholds to determine the significance and identify mitigation measures, similar to LOS methodology. Specific details about thresholds and methodologies for project impact evaluation and mitigations will be identified prior to July 1, 2020.*

   This raises an obvious question: If the City didn't have adopted criteria, how could they credibly determine significance?

3. Despite the lack of adopted significance criteria, the City somehow determined that the Project would have a Less Than Significant impact. (DPEIR, p. 4.16-42) The basis for this finding is simply that they have no adopted criteria ". . . nor are they required to be adopted until July 1, 2020. Therefore,

impacts related to VMT are considered LTS at this time." This seems disingenuous, at best. Absent an adopted standard, the significance of the impact can only be "Unknown."

4. Moreover, this "Less Than Significant" finding is contrary to other statements within the DPEIR and the LSA Traffic Impact Analysis (presented as Appendix J).

   - DPEIR p. 4.16-41 says:

     Because the measures of VMT in per capita and per employee increase with the City's General Plan (2035) compared to existing (2019) conditions, it is determined that continued implementation of the approved General Plan may be considered to result in a significant impact related to State CEQA Guidelines Section 15064.3 subdivision (b), analyzing transportation impacts consistent with SB 743.

   - According to the *General Plan Program EIR Traffic Impact Analysis* (LSA, February 2020, p. 5-2):

     Because the measures of VMT in per capita and per employee increase with the City's General Plan (2035) compared to existing (2019) conditions, it is determined that the proposed project would have a significant impact related to State CEQA Guidelines Section 15064.3 subdivision (b), analyzing transportation impacts consistent with SB 743.

5. It seems obvious that the VMT analysis revealed a significant impact with respect to transportation, based on the city's recommended standard of significance and the two statements immediately above. The Draft PEIR must be revised to incorporate this finding and recirculated for further public review.

6. The City attempted to remedy these deficiencies in the Response to Comments document, but failed miserably. We particularly refer to Response to Comment C3-9 (Response to Comments Document, pp. 3-81 – 3-85). Within that response, we have identified statements specifically addressing the significance of the VMT-related impact, as follows:

   - *. . . no determination regarding VMT was made.* (p. 3-81)
   - *. . . a significant impact determination could not be made due to lack of any adopted thresholds and guidelines at the time the analysis was prepared.* (p. 3-82)
   - *. . . no determination regarding VMT was made because the City did not have adopted thresholds and guidelines when the Draft PEIR was circulated for public comment.* (p. 3-83)
   - ***Level of Significance Without Mitigation:*** *Less Than Significant impact. VMT Thresholds were not adopted prior to publication of this Draft PEIR. With the adoption of Policy MT-2-m, the City will use VMT as the criteria* [sic] *for transportation impacts as the approved General Plan is continued to be implemented. Therefore, the impacts related to VMT are considered LTS at this time.* (p. 3-84) [Emphasis not added]

   So, contrary to the three statements clearly saying that no determination was made regarding VMT, the FPEIR ultimately and incorrectly determines that the impact will be Less Than Significant, even without mitigation. It is absolutely unclear how implementation of Policy MT-2-m relates to this determination, as that policy simply describes the parameter (VMT) that will serve as the basis for

determining CEQA transportation impacts in the future. It does not in any way address the specific VMT impacts of the General Plan.

Response to Comment C3-9 concludes with the following dubious statement:

> *With implementation of the City's VMT Guidelines and mitigation measures associated with VMT, the impacts related to VMT would be considered less than significant.* (p. 3-84)

Very simply, without knowing the specific mitigation measures that might be proposed under the City's newly-adopted guidelines, there is no basis for any conclusion regarding significance.

7. Response to Comment C3-9 also states that the City adopted VMT guidelines and thresholds subsequent to public review of the Draft PEIR, although the response fails to describe those guidelines or, more importantly, the thresholds. The response indicates that the newly-adopted thresholds apply to development projects, transportation projects, and plans (such as the General Plan) and, critically, that they were made effective July 1, 2020. This appears to be a blatant attempt to avoid addressing the VMT impacts associated with the General Plan. As noted above, both the DPEIR (p. 4.16-41) and the LSA traffic impact study (p. 5-2) state that the Project will have a significant impact with respect to VMT.

   Further research reveals that the VMT thresholds were adopted by the Fresno City Council on June 25, 2020. The specific guidelines and thresholds are documented in a report entitled, *CEQA Guidelines for Vehicle Miles Traveled Thresholds* (LSA, June 18, 2020). With respect to the adopted threshold for land use plans, that document (p. 38) states:

   > *Therefore, the recommended methodology for conducting VMT assessments for land use plans* [such as General Plans] *is to compare the existing VMT per capita and/or VMT per employee for the region with the expected horizon year VMT per capita and/or VMT per employee for the land use plan. If there is a net increase in the VMT metric under horizon year conditions, then the project will have a significant impact.*

   DPEIR Table 4.16-2: County and City of Fresno VMT (p. 4.16-40) clearly demonstrates that this threshold is exceeded in terms of both VMT per capita and VMT per employee. As noted above, DPEIR p. 4.16-41 directly states that the Project will have a significant impact under this threshold.

   Despite this clear evidence of a VMT-related significant impact, the City has chosen to evade its responsibilities. Instead:

   > *When the City prepares its next General Plan update, . . . the VMT analysis will be updated to include the City's adopted requirements for preparation of a VMT analysis for land use plans.*

   In other words, rather than set an example for other nearby jurisdictions by making a good faith effort to address this issue, the City has chosen to defer consideration of VMT impacts to some future time.

   We believe that the City must incorporate the VMT analysis (which has already been completed) into the FPEIR and identify necessary and appropriate mitigation measures. Then, the document must be recirculated for further public review prior to its adoption.

CONCLUSION

Our review of the Final Program Environmental Impact Report completed in connection with the City of Fresno General Plan revealed several issues regarding the adequacy of the traffic analysis, particularly with respect to consideration of impacts related to vehicle-miles traveled. Of particular concern is the fact that, although the document clearly states that a significant impact would result from implementation of the plan, it incorrectly identified that impact as less than significant, and thereby failed to identify necessary mitigation measures.

These deficiencies must be addressed prior to approval by the City of Fresno of the General Plan and its environmental documentation.

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact me at (906) 847-8276.

Sincerely,

GRIFFIN COVE TRANSPORTATION CONSULTING, PLLC

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September 10, 2014

Ms. Carmen Borg
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Subject: Review of "Transportation and Traffic" Analysis –
Draft Master Environmental Impact Report
General Plan and Development Code Update
City of Fresno, Fresno County, California

Dear Ms. Borg:

As requested, MRO Engineers, Inc., has completed a review of the "Transportation and Traffic" section of the Draft Master Environmental Impact Report (DMEIR) prepared with respect to the proposed General Plan and Development Code Update for the City of Fresno, California. That document was prepared by First Carbon Solutions and published on July 22, 2014. The DMEIR incorporates a traffic and transportation impact analysis prepared by Fehr & Peers (F&P).

This letter report documents the results of our detailed review of the DMEIR "Transportation and Traffic" analysis.

1. ***Deficient Travel Demand Forecasting Model*** – According to page 5.14-27 of the DMEIR:

> *"A modified version of the Fresno COG countywide travel demand forecasting (TDF) model was used to forecast future traffic volume for the City of Fresno General Plan Update. The modifications were specific to the City of Fresno to ensure that the model accurately estimated traffic volumes used in the analysis process . . . Appendix H-5 includes documentation of the transportation modeling and analysis steps including a summary of the model validation."*

Although DMEIR Appendix H-5 contains maps illustrating the boundaries of the model's traffic analysis zones (TAZ) and detailed information concerning the land use inputs for Existing, Existing Plus Project, and Cumulative Conditions, there is no other "documentation of the transportation modeling and analysis steps." As noted, however, there is a summary of the model validation, which is presented in a table entitled, "Fresno COG Traffic Model GIS Validation Results: PM Peak Hour Two-Way Total Traffic Volumes." For ease of reference, that table is presented here as Attachment A.

According to the *Travel Model Validation and Reasonableness Checking Manual – Second Edition* (Federal Highway Administration and Cambridge Systematics, Inc., September 24, 2010, p. 1-4), validation is defined as follows:

> *"Validation is the application of the calibrated models and comparison of the results against observed data."*

Specifically, the "base year" model is run and the traffic volume estimates generated by the model are compared to existing traffic volume data on a link-by-link basis. The question is, how well does the model replicate existing traffic volumes? The theory is that if the model can

accurately predict existing volumes (based on existing land use data and transportation system information), then it will accurately predict future traffic volumes (based on future land use and transportation system projections).

The results of the model validation process are summarized at the bottom of the table presented in Attachment A. Three parameters were used to determine whether the modified Fresno COG countywide model provides valid traffic estimates:

- The percent of road segments "within target deviation,"
- The Percent Root Mean Square Error, and
- The Correlation Coefficient.

For each of those three metrics, a target was established, and the model-generated traffic volume estimates were compared to those targets, with the following results:

- The percent of road segments "within target deviation" was 60 percent, whereas the goal was to exceed 75 percent,
- The "Percent Root Mean Square Error" was 46 percent, while the goal was to be less than 40 percent, and
- The "Correlation Coefficient" was 0.88, which just missed the goal of exceeding 0.88.

Each of these three parameters is discussed below.

Target Deviation

The "target deviations" employed in the model validation process are listed in the table presented in Attachment A; they range from 0.20 to 0.60. These values were derived from a curve presented in the Caltrans *Travel Forecasting* Guidelines (November 1992).

As noted above, the goal of the model validation process was for 75 percent of the links to fall within the allowable deviation. In other words, it was considered acceptable for 25 percent of the links to fall outside that allowable value. In fact, only 60 percent of the links met this target, meaning that a full 40 percent failed to do so. In this case, 199 of the 495 tested links had traffic forecasts that were either excessively high or low, compared to the actual traffic counts.

Of those 199 deficient traffic forecasts, 120 (60 percent) were lower than the corresponding traffic count. Moreover, of the 495 total roadway links, the traffic forecasts at 281 (57 percent) were lower than the actual count. The links at which traffic was underestimated are highlighted in yellow in Attachment A.

Percent Root Mean Square Error

Percent root mean square error, according to the FHWA *Travel Model Validation and Reasonableness Checking Manual* is a:

> *". . . measure of accuracy of the traffic assignment measuring the average error between the observed and modeled traffic volumes on links with traffic counts."*

The modified Fresno COG model validation had a goal for this parameter of less than 40 percent. The actual model validation result was 46 percent, which failed to meet the established goal. Thus, the model validation process determined that the modified Fresno COG model is not sufficiently accurate, which reinforces the results described above with respect to the target deviation.

Correlation Coefficient

Correlation coefficient is a measure of the degree of straight-line or linear association between two variables. A value of 1.00 would indicate a perfect relationship between the two variables. That is, as one variable increases, the other variable increases in a linear fashion. In this case, although the validation results indicate that the model again fell short of the established standard, the shortfall is minimal.

Conclusion

The model validation results for the modified Fresno COG countywide travel demand forecasting model clearly indicate that the model fails to provide accurate forecasts of future traffic – it can't even "predict" existing volumes. As described above, it tends to underestimate traffic. In fact, a number of the roadway links listed in the validation results table had literally no traffic assigned to them.

The use of this deficient tool to estimate study area traffic volumes has substantial ramifications for the environmental analysis. In addition to the likelihood that the underestimated traffic will result in failure to identify significant traffic impacts, it is probable that the air quality, noise, and greenhouse gas analyses are compromised by the defective traffic forecasts.

Clearly, more effort needs to be devoted to the model refinement process, with the goal of creating a travel demand forecasting model that actually provides credible forecasts of travel demand; the modified Fresno COG model used in the DMEIR traffic analysis is woefully inadequate in this regard. Once the model has been improved to the point that it is capable of replicating existing traffic volumes and generating meaningful future traffic projections, the DMEIR traffic analysis needs to be revised and the document needs to be recirculated for further public review.

2. ***Level of Service Calculation Methodology*** – The DMEIR traffic analysis focused on determination of level of service (LOS) for major roadway segments throughout the city. The specific process is described on DMEIR p. 5.14-4:

> *"The LOS was determined by comparing traffic volumes for selected roadway segments with peak hour LOS capacity thresholds. These thresholds are shown in Table 5.14-2 and were calculated based on the methodology contained in the Highway Capacity Manual (HCM) (Transportation Research Board 2000). The HCM methodology is the prevailing measurement standard used throughout the United States."*

Several points are in order with respect to the above statement from the DMEIR.

First, we note that the LOS analysis was based on the year 2000 version of the *Highway Capacity Manual*. This violates the requirement established in the *City of Fresno Traffic*

Impact Study Report Guidelines (City of Fresno, Department of Public Works, Updated February 2, 2009, p. 3), which requires that the:

> *"Most current edition of the Highway Capacity Manual by Transportation Research Board, and MUTCD shall be used."*

The current (year 2010) version of the *Highway Capacity Manual* (HCM 2010) was released on April 11, 2011. It follows previous editions completed in 1965, 1985, 1997, and 2000.

Although it is unclear exactly when the DMEIR traffic analysis was initiated, p. 5.14-4 of the document says that the traffic counts used in the analysis represent year 2012 conditions. Thus, the DMEIR traffic study was initiated at least a year after the current (2010) version of the *Highway Capacity Manual* became widely available. Despite this, the traffic analysis was performed using procedures documented in the superseded (year 2000) version of the *Highway Capacity Manual*, which violates standard City of Fresno procedures.

The second point concerns the DMEIR statement regarding the status of the HCM methodology as the prevailing standard for level of service analysis. This statement (which is true) implies that the HCM method was used in the DMEIR analysis (which is not true).

The DMEIR analysis is a simple volume/capacity (V/C) ratio evaluation. In this case, the volumes represent either the existing (year 2012) traffic volumes or the pertinent traffic forecasts generated by the deficient modified Fresno COG model. Only the estimated capacity thresholds were ostensibly based on HCM methodologies. DMEIR Table 5.14-2 (pages 5.14-7 and 5.14-8) presents a highly detailed set of LOS thresholds for various roadway types. Unfortunately, no information is provided that would illuminate the question of exactly how these thresholds were derived. (For ease of reference, DMEIR Table 5.14-2 is presented here as Attachment B.)

For example, DMEIR Table 5.14-2 provides thresholds for each level of service (LOS A through LOS F) for various numbers of lanes for a variety of roadway types, including freeways. Chapter 11 of the *Highway Capacity Manual* (2010) describes the HCM 2010 analysis procedures for "Basic Freeway Segments." According to that chapter, freeway level of service is defined by density (i.e., the number of passenger cars per mile per lane); neither traffic volume nor volume/capacity ratio is a measure of freeway level of service.

Moreover, under the HCM 2010 methodology, calculation of level of service on a freeway segment requires substantial data input, including the following:

- Free-flow speed (miles/hour),
- Number of mainline freeway lanes,
- Lane width (feet),
- Right-hand lateral clearance (feet),
- Total ramp density (i.e., ramps/mile),
- Terrain (level, rolling, or mountainous or specific grade information),
- Heavy-vehicle (i.e., truck) percentage,

- Peak-hour factor (which describes the uniformity of traffic flow within the peak hour), and
- Driver population (e.g., commuters who are familiar with the route or tourists who are not).

Although we have used freeways as an example to illustrate our point, similar considerations apply to all of the roadway types represented in DMEIR Table 5.14-2.

No information is provided in the DMEIR with regard to the specific input parameters that were used in developing the theoretical thresholds applied in the LOS analysis, whether for freeways or any of the other roadway types presented. Consequently, it is impossible to judge whether the analysis is credible and, moreover, whether the LOS results are valid.

Moreover, we assume (based on the nature of the information presented in DMEIR Table 5.14-2) that the same input assumptions were applied across the entire study area. This ignores the obvious fact that different roadways, or even different sections of a given road, vary somewhat. Lane widths, shoulder widths, truck percentages, and a wide variety of parameters could easily change as one travels down a particular roadway. The generic approach employed in the DMEIR analysis fails to account for these key differences, which raises serious questions as to the validity of the analysis results.

We also note that DMEIR Table 5.14-2 has "holes" where no capacity threshold value has been provided. For example, for "super arterial" roads, values are only shown for LOS D and E; no thresholds are presented for LOS A, B, or C. A footnote to the table might be an attempt to explain this. It says, "LOS is not achievable because of type of facility." Referring again to super arterials, this suggests that it is impossible for a driver to experience LOS A, B, or C. How can this be? If that driver happens to be traveling on one of Fresno's super arterials at a time when traffic is particularly light, will he not experience LOS A, which the DMEIR (p. 5.14-4) defines as:

> *". . . free-flow travel with an excellent level of comfort and convenience and the freedom to maneuver."*

According to DMEIR Table 5.14-2, the best this driver can expect is LOS D, which is defined as:

> *". . . high-density, but stable flow. Users experience severe restrictions in speed and freedom to maneuver, with poor levels of comfort and convenience."*

This simply defies common sense and, more importantly, raises questions as to the technical and philosophical approach to the analysis of roadway level of service. As presented, the LOS analysis for certain roadway types lacks credibility.

The failure to use the latest version of the *Highway Capacity Manual* represents a violation of City of Fresno procedures. To ensure the accuracy of the DMEIR traffic analysis, as well as consistency with City procedures and policies, the level of service calculations must be performed using the current, year 2010 version of the *Highway Capacity Manual*. Also, the specific inputs used to develop LOS thresholds must be revealed and adjusted, as necessary, to reflect the specific link-by-link characteristics of the study area roadways. After the LOS calculations are corrected, the DMEIR will need to be recirculated for further public review.

3. ***Obsolete Traffic Volume Data*** – According to the DMEIR (page 5.14-4):

> *"Traffic counts used for this analysis represent year 2012 conditions."*

Referring to the *City of Fresno Traffic Impact Study Report Guidelines* (p. 7):

> *"Available existing counts can be used if they are less than twelve (12) months old and the counts have not be* [sic] *significantly changed due to more recent development in the vicinity.*

The traffic counts used in the DMEIR are now two years old, which violates the City's standard, as well as accepted practice within the traffic engineering profession. Page 19 of the 2006 Institute of Transportation Engineers (ITE) document, *Transportation Impact Analyses for Site Development*, specifically states that ". . . traffic volume data should generally be no older than 1 year."

Because the traffic volumes represent the most critical input parameter in the level of service calculation process, any inaccuracies in those values directly affect the validity of the level of service results. In short, to the extent that the existing peak-hour traffic volumes are inaccurate, the corresponding level of service results reported in the DMEIR are invalid, and a misleading representation of the environmental setting and plan-related impacts will be provided. Although the document does not specifically say so, it is also likely that the future year traffic volumes were developed based, in part, on the existing traffic volumes. Thus, any shortcomings in the existing conditions data will adversely affect the validity of the future year information, as well.

Updated traffic data must be obtained and all analysis scenarios must be revised using the current traffic volume information. The modified transportation and traffic impact analysis should then be incorporated into a revised DMEIR, which must be recirculated for further public review.

4. ***Failure to Consider the Operational Effects of Truck Traffic*** – The proposed General Plan calls for substantial additional industrial land use, particularly in the south and west Fresno areas. Consequently, the road system in those areas will be called upon to accommodate substantial truck traffic.

As described above, it is impossible to determine what assumption has been incorporated into the analysis with regard to the heavy-vehicle percentage on the study area road system. Moreover, we would point out that the use of a blanket heavy-vehicle percentage for all study area roadways would be inappropriate, as it would fail to account for the relatively high truck percentages that can reasonably be anticipated in south and west Fresno and any other areas where substantial industrial development is proposed.

To ensure that the traffic impact analysis fully accounts for truck traffic, the analysis of each roadway link should incorporate a realistic "heavy vehicle percentage" and an appropriate "passenger-car equivalent" (PCE) factor. These factors can be used to derive adjusted traffic volumes that accurately account for the truck component of the pertinent traffic volume.

The traffic impact analysis incorporated into a recent draft environmental impact report prepared for the City of Irwindale in southern California used the following PCE values

(Reference: Urban Crossroads, *Athens-Irwindale Materials Recovery Facility and Transfer Station Traffic Impact Analysis*, February 27, 2014.):

- Light trucks: PCE = 1.5,
- Medium-duty trucks: PCE = 2.7, and
- Heavy-duty trucks: PCE = 3.7.

Thus, according to the assumptions employed in that analysis, one truck is equivalent to between 1.5 and 3.7 passenger cars, depending upon the specific type of truck. These factors reflect not only the size of the vehicles, but also their operating characteristics, particularly with regard to slower acceleration, longer braking distances, and the need for greater separation between vehicles.

The failure to incorporate appropriate factors reflecting the presence of a substantial number of trucks in the prevailing traffic stream results in unrealistic, overly-optimistic level of service results. The roadway segment level of service analyses must be revised to reflect the existing and anticipated composition of traffic in the study area.

5. ***Failure to Consider the Safety Effects of Truck Traffic*** – As described above, the proposed General Plan proposes substantial additional industrial land use in south and west Fresno, where residential neighborhoods are also common. Consequently, implementation of the proposed plan will add a considerable volume of heavy trucks to the road system in those areas. Despite this, the "Transportation and Traffic" section of the DMEIR includes no discussion or analysis of auto-truck conflicts and the potential safety issues associated with mixing automobile traffic with a considerable amount of heavy-vehicle traffic. This is a substantial deficiency in the DMEIR, given the extent of nearby residential land uses.

6. ***Deficient Safety Analysis*** – DMEIR p. 5.14-15 provides a one-paragraph section labeled "Traffic Safety." That section briefly describes a small number of locations in Fresno having the highest number of vehicular collisions since 2009. This information, which is presented graphically on Exhibit 5.14-5 in Appendix H-12, is based on data presented in the Statewide Integrated Traffic Records System (SWITRS).

   Unfortunately, this information is virtually meaningless, as the number of collisions alone fails to account for the total volume of traffic at any given location. For example, consider two hypothetical locations, both of which were found to have 100 collisions per year. Location A carries 10,000 vehicles per day, while Location B has 100,000 vehicles per day. Based on the analysis presented in the DMEIR, these two locations are equally problematical, despite the fact that one carries ten times more traffic than the other.

   This is, of course, not accurate and is, further, misleading. This example illustrates that it is not simply the number of collisions that matters; it's the rate at which the collisions occur that accurately tells the story. A valid traffic safety analysis will include the development and comparison of accident rates, in terms of collisions per million-vehicle-miles for key roadway segments. The DMEIR, though, provides no such assessment and, therefore, it is impossible to determine whether the accident data indicates an existing safety problem. In addition, the DMEIR contains no evaluation with respect to the potential impacts of implementation of the proposed General plan on traffic safety within the City of Fresno. The DMEIR must be revised

to include a detailed analysis of plan-related safety impacts and to identify needed mitigation measures.

7. ***Failure to Consider Pedestrian and Bicycle System Impacts*** – As noted above, the level of service on the study area road system was derived (DMEIR, p. 5.14-4):

> *". . . based on the methodology contained in the Highway Capacity Manual (HCM) (Transportation Research Board 2000)."*

The DMEIR goes on to say:

> *"It should be noted that this traditional methodology used to analyze the roadway system does not consider the potential impact on walking, bicycling, and transit."*

The analyst appears to be unfamiliar with the current, year 2010 edition of the *Highway Capacity Manual*, which might explain why the roadway LOS values were inappropriately derived using the superseded year 2000 version of that document. In fact, the very first paragraph of the "Foreword" in the current HCM document (p. V1-i) states that:

> *"It is the first* Highway Capacity Manual *to provide an integrated multimodal approach to the analysis and evaluation of urban streets from the points of view of automobile drivers, transit passengers, bicyclists, and pedestrians. This is the first manual to take into account the effects of cars on bicyclists and pedestrians."*

Recognizing the integrated nature of the transportation system, the HCM does not include separate chapters for non-automobile travel modes. Instead, the document states (HCM 2010, p. 1-4.):

> *"Where applicable, pedestrian and bicycle material has been integrated throughout the Volume 3* [Interrupted Flow] *chapters, along with the public transit material specific to multimodal analyses."*

Detailed analysis procedures for the pedestrian, bicycle, and transit modes are presented in HCM 2010 Chapters 16 (Urban Street Facilities) and 17 (Urban Street Segments).

Given the focus of the proposed Fresno General Plan Update on accommodating all travel modes, it is difficult to understand how the non-automobile modes could be so thoroughly dismissed in the DMEIR. The DMEIR acknowledges this modified City perspective with the following statement (DMEIR, p. 5.14-42):

> *"The General Plan Update accepts lower LOS values. This reflects a change in policy for the City of Fresno to acknowledge that transportation planning based solely on roadway LOS . . . is not desirable since it fails to acknowledge other users of the circulation system and other community values."*

Moreover, the specific policies and objectives in the proposed General Plan related to pedestrian, bicycle, and transit facilities are detailed on pages 5.14-85 through 5.14-88 in the DMEIR.

Impact TRANS-6 concerns the potential impacts of the proposed General Plan on these "alternative" travel modes. It is addressed beginning on p. 5.14-85 of the DMEIR. As stated there:

> *"The project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities."*

Although the next several pages of the DMEIR list the policies and objectives that relate to the non-automobile travel modes, no quantitative analysis or qualitative statement is provided to address the potential impacts of the proposed General Plan with regard to the "performance or safety of such facilities." Consequently, there is simply no basis for the DMEIR' s finding of a less-than-significant impact.

The DMEIR ignores factors that could lead to significant operational and safety-related impacts throughout the City as the plan is implemented. At the very minimum, transit users will suffer from the extensive travel delays imposed by a roadway system where LOS E and F are prevalent. Moreover, pedestrians and bicyclists are likely to be exposed to unsafe conditions, as frustrated motorists become impatient and make poor decisions leading to red light running, failure to yield to pedestrians in crosswalks, or using road shoulders and bike lanes as added travel or turn lanes.

Given the importance of non-automotive travel within the proposed plan, it is essential that the DMEIR include a meaningful analysis of the plan's impacts on those alternative modes. Such an analysis is absent from the current document. Upon completion of the analysis, the DMEIR must be revised and recirculated for further public review.

8. ***Vehicle Miles Traveled Calculation*** – DMEIR Table 5.14-3 presents estimates of vehicle miles traveled (VMT) for the three analysis scenarios addressed in the traffic study: Existing Conditions, Existing Plus General Plan Buildout, and Cumulative Plus General Plan Buildout.

   Addition of General Plan Buildout to existing conditions is projected to increase the daily VMT by almost 8,950,000 vehicle-miles, an increase of 95 percent. Under cumulative conditions, total VMT is projected to increase by over 111 percent (i.e., 10,487,655 vehicle-miles) compared to existing conditions.

   Unfortunately, these values were derived through a "black box" process using the modified Fresno COG Countywide Travel Demand Forecasting Model, and no detail is provided to assist the reader in understanding the factors that were key in developing these estimates or, more importantly, to judge whether the estimates are credible. Because the VMT values are key inputs to the air quality and greenhouse gas analyses, it is important to ensure the validity of these values. (Of course, as described earlier, the ability of the Fresno COG model to provide meaningful estimates of future travel (including future VMT estimates) is highly questionable.)

   We note that California in September 2013 enacted Senate Bill 743 (SB 743), which will eventually eliminate level of service as a determinant of significant effects in documents prepared under the California Environmental Quality Act (CEQA), such as the DMEIR. In other words, vehicular delay will no longer be considered an environmental impact under CEQA. Instead, VMT will be the primary measure of transportation impacts. Although

debatable, this is ostensibly intended to better reflect the multi-modal nature of the transportation system, particularly with regard to pedestrians, bicyclists, and transit users.

Although no local or statewide thresholds have been established with regard to what constitutes a significant impact concerning increases in vehicle miles traveled, it is disappointing that the DMEIR would dismiss a 111 percent increase in VMT as insignificant.

9. ***At-Grade Railroad Crossing Safety*** – As described on DMEIR pages 5.14-17 and 5.14-18, Fresno is served by two railroad corridors. The Burlington Northern Santa Fe (BNSF) corridor runs through "the middle of downtown" and the Union Pacific (UP) corridor runs parallel to State Route 99 (SR 99). Moreover, ". . . about 50 freight trains pass through the two rail corridors daily as they travel through Downtown."

   Each of these rail lines has numerous at-grade crossings of local streets and, further, each of those locations represents a potentially hazardous condition. As traffic increases in Fresno in accordance with the General Plan Update land use plan, the likelihood of conflicts between automobiles and trains will also increase. Despite this, the DMEIR fails to address safety-related issues associated with at-grade rail crossings. This is a substantial deficiency that must be corrected.

10. ***Emergency Access*** – Impact TRANS-5 (DMEIR, p. 5.14-83) addresses whether the proposed plan would result in inadequate emergency access, and concludes that the General Plan Update would have a less-than-significant impact. This conclusion was based largely on a review of the proposed General Plan policies and objectives that might "provide adequate emergency access." We note that the potential role of certain of these policies in providing adequate emergency access is questionable. For example, it is unclear how Policy LU-1-g has any effect on emergency access: "Maintain the City's current SOI boundaries without additional expansion . . ." Since the SOI boundary is nothing more than a line on a map, we fail to see any effect whatsoever with respect to emergency access.

    The DMEIR discussion of the emergency access issue includes the following statement:

    > *"Implementation of the City of Fresno General Plan Update would increase the amount of vehicle traffic, which would require the improvement and expansion of the City of Fresno's roadway system . . . to accommodate forecasts* [sic] *travel demand as well as maintaining acceptable traffic operations (LOS) in the City (see Impact TRANS-1). An enhanced roadway network that accommodates forecasted travel demand would also provide adequate emergency access."*

    There are several problems with this statement. First, while it is certainly true that implementation of the proposed plan will increase the amount of vehicle traffic (as noted earlier, the plan will more than double daily vehicle miles traveled), there is no certainty regarding the "improvement and expansion of the City of Fresno's roadway system." Road construction is dependent upon the availability of funding (among other factors) and it is not certain whether adequate funding will be available in coming years to keep up with needs.

    Second, it is also true that, "[a]n enhanced roadway network that accommodates forecasted travel demand would also provide adequate emergency access." Unfortunately, as demonstrated in the DMEIR, the City's road system will not, in many cases, accommodate the forecasted traffic demand. For example, the level of service standard for the entire Downtown

Planning Area (designated as Traffic Impact Zone I or TIZ-I) is LOS F. Similarly, roadway segments within TIZ-II ("areas of the City currently built-up and wanting to encourage infill development") and TIZ-III ("areas near or outside the City limits but within the SOI") that the DMEIR has identified as operating at LOS F are "grandfathered in" and will be allowed to continue to operate at LOS F.

By definition, roads that are projected to operate at LOS F will not accommodate forecasted traffic demand. Referring to the level of service definitions provided on DMEIR p. 5.14-4:

> *"LOS F is used to define forced or breakdown conditions. This condition exists wherever the volume of traffic exceeds the capacity of the roadway. Long queues can form behind these bottleneck points with queued traffic traveling in a stop-and-go fashion."*

Clearly, such roads will not provide adequate emergency access. The simple fact is that roads that are at LOS F will be clogged with traffic, which will impede the ability of emergency vehicles to respond to calls. A recent (September 2 and 3, 2014) feature on the NBC *Nightly News* addressed the issue of delays in emergency response due to traffic congestion. According to that report, research has indicated a ten percent increase in deaths for every minute of delay in emergency response time. Further, a 2012 study in Utah found an eight percent increase in fatalities within the 24-hour period following a delayed emergency response.

Traffic delays caused by planned congestion associated with the proposed General Plan Update will, very simply, result in additional fatalities among the citizens of Fresno, particularly in the areas of the City where LOS F will be allowed by General Plan policies. This is a significant impact, which was ignored in the DMEIR.

CONCLUSION

Our review of the "Transportation and Traffic" section of the Draft Master Environmental Impact Report for the proposed City of Fresno General Plan Update revealed several issues that affect the validity of the conclusions presented in that document. These issues should be addressed prior to City of Fresno approval of the proposed plan and the associated environmental documentation.

Among other considerations, we find it ironic that the City of Fresno has developed a General Plan Update that:

- Explicitly encourages and addresses the needs of non-automobile travel through an extensive set of policies and objectives, while
- Performing absolutely no analysis to determine whether the proposed plan will have adverse operational or safety impacts on pedestrians, bicyclists, and transit users, and
- Determines that implementation of the proposed General Plan Update will have no significant traffic impacts, even though roads throughout the City will operate at LOS E and F, while also
- Determining that VMT in the City will more than double as a result of plan implementation, but still

- Maintaining that the proposed plan will have no significant transportation impacts requiring mitigation.

As described above, the DMEIR "Transportation and Traffic" analysis has substantial deficiencies and, further, has failed to identify a number of significant impacts,

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact us at (916) 783-3838.

Sincerely,

MRO ENGINEERS, INC.

Neal K. Liddicoat, P.E.
Traffic Engineering Manager

MRO ENGINEERS

ATTACHMENT A

Fresno COG Traffic Model GIS Validation Results:
PM Peak Two-Way Total Traffic Volumes

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes													
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
1	A	N/O	STANISLAUS	5186	5190	05186-05190	160	183	0.87	0.60	Yes	-23	529
2	ABBY	S/O	180	4404	2040	04404-02040	983	290	3.39	0.60	No	693	480,249
3	ABBY	N/O	DIVISADERO	2093	2092	02093-02092	1,055	371	2.84	0.60	No	684	467,856
4	ABBY	S/O	OLIVE	2087	2086	02087-02086	908	854	1.06	0.60	Yes	54	2,916
5	AIRWAYS	W/O	CLOVIS	2540	8220	02540-08220	1,338	1,135	1.18	0.35	Yes	203	41,209
6	ALLUVIAL	E/O	CEDAR	3093	3105	03093-03105	483	912	0.53	0.60	Yes	-429	184,041
7	ALLUVIAL	E/O	CHESTNUT	3100	3110	03100-03110	130	1,013	0.13	0.37	No	-883	779,689
8	ALLUVIAL	E/O	INGRAM	6540	6542	06540-06542	739	840	0.88	0.60	Yes	-101	10,201
9	ALLUVIAL	E/O	MAPLE	3096	3108	03096-03108	350	1,020	0.34	0.37	No	-670	448,900
10	ALLUVIAL	E/O	MARKS	3165	5047	03165-05047	97	162	0.60	0.60	Yes	-65	4,225
11	ALLUVIAL	W/O	MILBURN	5784	5791	05784-05791	790	436	1.81	0.60	No	354	125,316
12	ALLUVIAL	E/O	VAN NESS	3166	5048	03166-05048	8	104	0.08	0.60	No	-96	9,216
13	ALLUVIAL	E/O	WEST	3168	5049	03168-05049	1	53	0.02	0.60	No	-52	2,704
14	ANNADALE	E/O	CEDAR	8434	9236	08434-09236	0	66	0.00	0.60	No	-66	4,356
15	ANNADALE	W/O	ELM	2134	2779	02134-02779	307	206	1.49	0.60	Yes	101	10,201
16	ANNADALE	W/O	MARTIN LUTHER KING JR	2914	2934	02914-02934	17	19	0.89	0.60	Yes	-2	4
17	ANNADALE	W/O	WALNUT	2934	3036	02934-03036	0	9	0.00	0.60	No	-9	81
18	ARMSTRONG	N/O	BELMONT	3559	12146	03559-12146	294	239	1.23	0.60	Yes	55	3,025
19	ARMSTRONG	N/O	BUTLER	5627	6684	05627-06684	16	118	0.14	0.60	No	-102	10,404
20	ARMSTRONG	S/O	CHURCH	6685	12142	06685-12142	11	121	0.09	0.60	No	-110	12,100
21	ARMSTRONG	S/O	DAKOTA	5021	8378	05021-08378	118	360	0.33	0.60	No	-242	58,564
22	ARMSTRONG	S/O	KINGS CANYON	3560	6684	03560-06684	15	252	0.06	0.60	No	-237	56,169
23	ASHLAN	W/O	41	3128	4336	03128-04336	2,411	2,210	1.09	0.27	Yes	201	40,401
24	ASHLAN	E/O	BLACKSTONE	2077	3128	02077-03128	1,911	2,312	0.83	0.27	Yes	-401	160,801
25	ASHLAN	W/O	BRYAN	3330	5072	03330-05072	138	155	0.89	0.60	Yes	-17	289
26	ASHLAN	E/O	CEDAR	2450	2451	02450-02451	2,522	2,091	1.21	0.28	Yes	431	185,761
27	ASHLAN	E/O	CHESTNUT	5034	6812	05034-06812	1,425	1,863	0.76	0.29	Yes	-438	191,844
28	ASHLAN	E/O	DEL MAR	2077	2444	02077-02444	1,171	1,598	0.73	0.31	Yes	-427	182,329
29	ASHLAN	E/O	FRESNO	2445	2446	02445-02446	1,850	1,805	1.02	0.29	Yes	45	2,025
30	ASHLAN	W/O	FRUIT	2440	5428	02440-05428	1,611	1,375	1.17	0.32	Yes	236	55,696
31	ASHLAN	W/O	HAYES	3330	5072	03330-05072	138	208	0.66	0.60	Yes	-70	4,900
32	ASHLAN	E/O	MILLBROOK	2449	5007	02449-05007	1,960	1,931	1.02	0.28	Yes	29	841
33	ASHLAN	W/O	SANTA FE	2440	5428	02440-05428	1,611	1,359	1.19	0.32	Yes	252	63,504
34	ASHLAN	E/O	WEBER	3119	5084	03119-05084	3,093	3,111	0.99	0.25	Yes	-18	324
35	ASHLAN	W/O	WEST	2438	5431	02438-05431	1,801	1,495	1.20	0.31	Yes	306	93,636
36	ASHLAN	W/O	WINERY	5034	6288	05034-06288	1,425	2,657	0.54	0.26	No	-1,232	1,517,824
37	AUDUBON	E/O	BLACKSTONE	3173	3174	03173-03174	729	1,465	0.50	0.31	No	-736	541,696
38	AUDUBON	N/O	COLE	3175	3176	03175-03176	772	1,028	0.75	0.37	Yes	-256	65,536
39	AUDUBON	W/O	DEL MAR	2060	12117	02060-12117	434	1,237	0.35	0.33	No	-803	644,809
40	AUDUBON	W/O	FRIANT	3173	5584	03173-05584	575	1,519	0.38	0.31	No	-944	891,136
41	AUDUBON	N/O	LEXINGTON	3272	3274	03272-03274	499	1,244	0.40	0.33	No	-745	555,025
42	AUDUBON	N/O	NEES	3272	6560	03272-06560	437	1,126	0.39	0.35	No	-689	474,721
43	B	N/O	STANISLAUS	3493	4438	03493-04438	214	213	1.00	0.60	Yes	1	1
44	B	N/O	TUOLUMNE	2180	3493	02180-03493	94	180	0.52	0.60	Yes	-86	7,396
45	BARSTOW	E/O	BLACKSTONE	2072	2347	02072-02347	1,660	1,542	1.08	0.31	Yes	118	13,924
46	BARSTOW	E/O	BRAWLEY	2337	3562	02337-03562	33	354	0.09	0.60	No	-321	103,041
47	BARSTOW	E/O	CEDAR	2354	12314	02354-12314	1,569	1,073	1.46	0.36	No	496	246,016
48	BARSTOW	W/O	CEDAR	2354	5442	02354-05442	1,451	987	1.47	0.60	Yes	464	215,296
49	BARSTOW	E/O	FRUIT	2342	2343	02342-02343	358	1,009	0.35	0.37	No	-651	423,801
50	BARSTOW	E/O	GRANTLAND	3295	6744	03295-06744	32	79	0.41	0.60	Yes	-47	2,209
51	BARSTOW	E/O	PALM	2311	2344	02311-02344	684	903	0.76	0.60	Yes	-219	47,961
52	BARSTOW	E/O	THORNE	2344	3195	02344-03195	358	1,084	0.33	0.36	No	-726	527,076
53	BARSTOW	W/O	VALENTINE	3562	3563	03562-03563	30	133	0.23	0.60	No	-103	10,609
54	BARSTOW	E/O	WEST	2341	3194	02341-03194	156	770	0.20	0.60	No	-614	376,996
55	BEHYMER	E/O	CHANCE	5513	5517	05513-05517	16	427	0.04	0.60	No	-411	168,921
56	BEHYMER	E/O	MAPLE	5513	6648	05513-06648	474	332	1.43	0.60	Yes	142	20,164
57	BEHYMER	W/O	MAPLE	5513	5517	05513-05517	16	378	0.04	0.60	No	-362	131,044
58	BELMONT	W/O	99	4368	4369	04368-04369	428	420	1.02	0.60	Yes	8	64
59	BELMONT	E/O	ABBY	2090	2728	02090-02728	809	573	1.41	0.60	Yes	236	55,696
60	BELMONT	W/O	BLACKSTONE	4402	4403	04402-04403	530	168	3.15	0.60	No	362	131,044
61	BELMONT	E/O	CEDAR	2737	2738	02737-02738	1,167	1,070	1.09	0.36	Yes	97	9,409
62	BELMONT	W/O	CHESTNUT	2741	2742	02741-02742	698	884	0.79	0.60	Yes	-186	34,596
63	BELMONT	W/O	CLOVIS	2746	2747	02746-02747	289	534	0.54	0.60	Yes	-245	60,025
64	BELMONT	E/O	FIRST	2733	2734	02733-02734	762	1,388	0.55	0.32	No	-626	391,876
65	BELMONT	W/O	FRESNO	2729	2730	02729-02730	771	659	1.17	0.60	Yes	112	12,544
66	BELMONT	W/O	FULTON	4382	5178	04382-05178	1,031	878	1.17	0.60	Yes	153	23,409
67	BELMONT	W/O	H	2723	6650	02723-06650	651	634	1.03	0.60	Yes	17	289
68	BELMONT	W/O	MAPLE	2739	2740	02739-02740	923	1,160	0.80	0.34	Yes	-237	56,169
69	BELMONT	W/O	MARKS	3363	3473	03363-03473	179	409	0.44	0.60	Yes	-230	52,900
70	BELMONT	W/O	PEACH	2745	5505	02745-05505	442	904	0.49	0.60	Yes	-462	213,444
71	BLACKSTONE	N/O	ALLUVIAL	6539	9180	06539-09180	2,657	2,821	0.94	0.26	Yes	-164	26,896
72	BLACKSTONE	N/O	BREMER	5438	4400	05438-04400	802	685	1.17	0.60	Yes	117	13,689
73	BLACKSTONE	N/O	BULLARD	2071	2130	02071-02130	2,566	1,259	2.04	0.33	No	1,307	1,708,249
74	BLACKSTONE	N/O	CLINTON	2082	3253	02082-03253	1,789	1,177	1.52	0.34	No	612	374,544
75	BLACKSTONE	S/O	DAKOTA	2078	2079	02078-02079	1,632	835	1.95	0.60	No	797	635,209
76	BLACKSTONE	N/O	DIVISADERO	4413	4412	04413-04412	479	421	1.14	0.60	Yes	58	3,364
77	BLACKSTONE	N/O	GETTYSBURG	2075	2076	02075-02076	1,953	1,098	1.78	0.36	No	855	731,025
78	BLACKSTONE	S/O	HERNDON	2068	3223	02068-03223	2,225	968	2.30	0.60	No	1,257	1,580,049
79	BLACKSTONE	S/O	OLIVE	2086	4361	02086-04361	491	637	0.77	0.60	Yes	-146	21,316
80	BLACKSTONE	N/O	SHAW	2073	2074	02073-02074	1,942	1,241	1.56	0.33	No	701	491,401

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
81	BLACKSTONE	N/O	SHIELDS	2079	2080	02079-02080	1,877	835	2.25	0.60	No	1,042	1,085,764
82	BLACKSTONE	N/O	SIERRA	2069	3223	02069-03223	2,285	605	3.78	0.60	No	1,680	2,822,400
83	BRAWLEY	N/O	BARSTOW	2337	5487	02337-05487	1,249	1,798	0.69	0.30	No	-549	301,401
84	BRAWLEY	S/O	CALIFORNIA	5136	8062	05136-08062	104	106	0.98	0.60	Yes	-2	4
85	BRAWLEY	N/O	CLINTON	2562	3429	02562-03429	213	860	0.25	0.60	No	-647	418,609
86	BRAWLEY	N/O	DAKOTA	3339	3340	03339-03340	579	537	1.08	0.60	Yes	42	1,764
87	BRAWLEY	N/O	GETTYSBURG	3118	3585	03118-03585	1,290	1,218	1.06	0.33	Yes	72	5,184
88	BRAWLEY	S/O	HERNDON	3281	5107	03281-05107	1,280	793	1.61	0.60	No	487	237,169
89	BRAWLEY	N/O	NIELSEN	5120	5440	05120-05440	152	384	0.40	0.60	No	-232	53,824
90	BRAWLEY	N/O	SHAW	2374	3571	02374-03571	1,436	3,053	0.47	0.25	No	-1,617	2,614,689
91	BRAWLEY	N/O	WEBER	3118	3585	03118-03585	1,290	608	2.12	0.60	No	682	465,124
92	BROADWAY	N/O	41	6145	6187	06145-06187	436	522	0.84	0.60	Yes	-86	7,396
93	BROADWAY	N/O	DIVISADERO	4385	5400	04385-05400	186	87	2.14	0.60	No	99	9,801
94	BROADWAY	N/O	FRESNO	9226	9227	09226-09227	297	202	1.47	0.60	Yes	95	9,025
95	BROADWAY	S/O	VENTURA	4457	5222	04457-05222	25	238	0.11	0.60	No	-213	45,369
96	BRYAN	S/O	ASHLAN	3326	5632	03326-05632	162	62	2.61	0.60	No	100	10,000
97	BULLARD	E/O	41	3675	4327	03675-04327	2,646	2,601	1.02	0.26	Yes	45	2,025
98	BULLARD	W/O	BLACKSTONE	2071	3126	02071-03126	2,177	1,983	1.10	0.28	Yes	194	37,636
99	BULLARD	E/O	CARNEGIE	5806	5808	05806-05808	292	808	0.36	0.60	No	-516	266,256
100	BULLARD	E/O	CEDAR	2316	5001	02316-05001	1,850	2,114	0.88	0.27	Yes	-264	69,696
101	BULLARD	W/O	CEDAR	2313	2314	02313-02314	2,006	2,055	0.98	0.28	Yes	-49	2,401
102	BULLARD	W/O	CHESTNUT	2316	5001	02316-05001	1,850	2,029	0.91	0.28	Yes	-179	32,041
103	BULLARD	W/O	FIRST	2309	3245	02309-03245	2,044	2,467	0.83	0.26	Yes	-423	178,929
104	BULLARD	W/O	FRESNO	3675	4327	03675-04327	2,646	2,563	1.03	0.26	Yes	83	6,889
105	BULLARD	E/O	GRANTLAND	2294	6740	02294-06740	14	104	0.13	0.60	No	-90	8,100
106	BULLARD	W/O	JEANNE	3291	5052	03291-05052	34	91	0.37	0.60	No	-57	3,249
107	BULLARD	W/O	MAPLE	2316	5001	02316-05001	1,850	1,900	0.97	0.28	Yes	-50	2,500
108	BULLARD	E/O	MAROA	2306	3126	02306-03126	2,350	2,328	1.01	0.27	Yes	22	484
109	BULLARD	W/O	MILLBROOK	2312	3244	02312-03244	2,084	2,514	0.83	0.26	Yes	-430	184,900
110	BULLARD	W/O	PALM	2303	3201	02303-03201	2,230	1,869	1.19	0.29	Yes	361	130,321
111	BULLARD	E/O	VALENTINE	6062	12301	06062-12301	40	358	0.11	0.60	No	-318	101,124
112	BULLARD	E/O	WEST	2301	3193	02301-03193	1,940	1,668	1.16	0.30	Yes	272	73,984
113	BUTLER	E/O	ARMSTRONG	2850	5627	02850-05627	24	16	1.50	0.60	Yes	8	64
114	BUTLER	E/O	CHESTNUT	2842	2843	02842-02843	661	684	0.97	0.60	Yes	-23	529
115	BUTLER	W/O	CLOVIS	2846	2847	02846-02847	157	410	0.38	0.60	No	-253	64,009
116	CALAVERAS	E/O	N	3008	6084	03008-06084	213	148	1.44	0.60	Yes	65	4,225
117	CALIFORNIA	E/O	BRAWLEY	3068	3113	03068-03113	15	95	0.16	0.60	No	-80	6,400
118	CALIFORNIA	W/O	CEDAR	2879	3505	02879-03505	148	88	1.68	0.60	No	60	3,600
119	CALIFORNIA	E/O	CHERRY	5405	6188	05405-06188	11	59	0.19	0.60	No	-48	2,304
120	CALIFORNIA	E/O	MARKS	2863	2966	02863-02966	94	154	0.61	0.60	Yes	-60	3,600
121	CALIFORNIA	E/O	ORANGE	2878	3505	02878-03505	203	127	1.60	0.60	Yes	76	5,776
122	CALIFORNIA	W/O	TUPMAN	2872	6089	02872-06089	409	455	0.90	0.60	Yes	-46	2,116
123	CALIFORNIA	W/O	WALNUT	3586	6750	03586-06750	185	304	0.61	0.60	Yes	-119	14,161
124	CALIFORNIA	E/O	WEST	2865	2866	02865-02866	58	496	0.12	0.60	No	-438	191,844
125	CECELIA	N/O	BULLARD	2929	5411	02929-05411	1,388	468	2.97	0.60	No	920	846,400
126	CEDAR	N/O	BULLDOG	2354	3129	02354-03129	1,693	2,100	0.81	0.27	Yes	-407	165,649
127	CEDAR	S/O	CALIFORNIA	2879	3146	02879-03146	528	605	0.87	0.60	Yes	-77	5,929
128	CEDAR	N/O	CENTRAL	2962	12353	02962-12353	98	126	0.78	0.60	Yes	-28	784
129	CEDAR	S/O	CENTRAL	5169	8106	05169-08106	105	129	0.81	0.60	Yes	-24	576
130	CEDAR	N/O	CHURCH	2897	3146	02897-03146	461	714	0.65	0.60	Yes	-253	64,009
131	CEDAR	N/O	CLINTON	2557	2586	02557-02586	1,315	941	1.40	0.60	Yes	374	139,876
132	CEDAR	N/O	COPPER	3053	12318	03053-12318	283	80	3.54	0.60	No	203	41,209
133	CEDAR	S/O	DAKOTA	2491	2508	02491-02508	938	1,450	0.65	0.31	No	-512	262,144
134	CEDAR	S/O	HERNDON	2252	2283	02252-02283	1,962	1,686	1.16	0.30	Yes	276	76,176
135	CEDAR	N/O	JENSEN	3150	4614	03150-04614	401	417	0.96	0.60	Yes	-16	256
136	CEDAR	S/O	MCKINLEY	2634	2651	02634-02651	1,684	1,611	1.05	0.30	Yes	73	5,329
137	CEDAR	N/O	NEES	2230	3112	02230-03112	879	1,839	0.48	0.29	No	-960	921,600
138	CEDAR	N/O	NORTH	2952	5296	02952-05296	225	387	0.58	0.60	Yes	-162	26,244
139	CEDAR	S/O	PARKWAY	2962	3693	02962-03693	114	148	0.77	0.60	Yes	-34	1,156
140	CEDAR	S/O	SHAW	2140	2399	02140-02399	1,836	1,401	1.31	0.31	No	435	189,225
141	CEDAR	S/O	SHEPHERD	2222	3067	02222-03067	422	1,716	0.25	0.30	No	-1,294	1,674,436
142	CEDAR	N/O	TEAGUE	3067	3161	03067-03161	630	1,685	0.37	0.30	No	-1,055	1,113,025
143	CEDAR	N/O	TULARE	2767	2787	02767-02787	761	1,322	0.58	0.32	No	-561	314,721
144	CEDAR	N/O	VENTURA	2189	2813	02189-02813	893	1,390	0.64	0.32	No	-497	247,009
145	CENTRAL	W/O	MAPLE	5176	6202	05176-06202	89	136	0.65	0.60	Yes	-47	2,209
146	CHAMPLAIN	E/O	FRIANT	3305	5464	03305-05464	5	386	0.01	0.60	No	-381	145,161
147	CHERRY	N/O	ANNADALE	2938	5177	02938-05177	508	256	1.98	0.60	No	252	63,504
148	CHESTNUT	S/O	BELMONT	2742	3545	02742-03545	2,223	2,173	1.02	0.27	Yes	50	2,500
149	CHESTNUT	S/O	BUTLER	2842	2856	02842-02856	1,197	743	1.61	0.60	No	454	206,116
150	CHESTNUT	S/O	CALIFORNIA	2856	5278	02856-05278	1,474	1,429	1.03	0.31	Yes	45	2,025
151	CHESTNUT	S/O	CHURCH	2900	3541	02900-03541	1,096	921	1.19	0.60	Yes	175	30,625
152	CHESTNUT	N/O	HERNDON	2253	6107	02253-06107	1,414	505	2.80	0.60	No	909	826,281
153	CHESTNUT	S/O	JENSEN	2927	5291	02927-05291	1,197	1,126	1.06	0.35	Yes	71	5,041
154	CHESTNUT	N/O	NEES	2231	4996	02231-04996	1,055	887	1.19	0.60	Yes	168	28,224
155	CHESTNUT	N/O	OLIVE	2653	2687	02653-02687	2,028	1,332	1.52	0.32	No	696	484,416
156	CHESTNUT	N/O	SHIELDS	2539	5011	02539-05011	1,749	1,204	1.45	0.33	No	545	297,025
157	CHESTNUT	N/O	TEAGUE	3071	5467	03071-05467	845	978	0.86	0.60	Yes	-133	17,689
158	CHURCH	E/O	ARMSTRONG	3317	3557	03317-03557	11	32	0.34	0.60	No	-21	441
159	CHURCH	E/O	BLYTHE	4263	4407	04263-04407	11	34	0.32	0.60	No	-23	529
160	CHURCH	E/O	CHESTNUT	3239	5277	03239-05277	132	323	0.41	0.60	Yes	-191	36,481

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
161	CHURCH	E/O	ELM	2108	5729	02108-05729	225	342	0.66	0.60	Yes	-117	13,689
162	CHURCH	E/O	FOWLER	3317	3557	03317-03557	11	94	0.12	0.60	No	-83	6,889
163	CHURCH	W/O	FRUIT	2885	2992	02885-02992	23	120	0.19	0.60	No	-97	9,409
164	CHURCH	E/O	PEACH	6527	8264	06527-08264	0	157	0.00	0.60	No	-157	24,649
165	CHURCH	W/O	PEACH	2901	3533	02901-03533	137	236	0.58	0.60	Yes	-99	9,801
166	CLINTON	E/O	ANGUS	2580	2581	02580-02581	1,315	1,048	1.25	0.37	Yes	267	71,289
167	CLINTON	E/O	BLACKSTONE	2082	2577	02082-02577	1,552	1,245	1.25	0.33	Yes	307	94,249
168	CLINTON	E/O	CEDAR	2586	5710	02586-05710	851	840	1.01	0.60	Yes	11	121
169	CLINTON	E/O	FIRST	2581	2582	02581-02582	1,258	1,095	1.15	0.36	Yes	163	26,569
170	CLINTON	E/O	FOWLER	12148	12154	12148-12154	57	180	0.32	0.60	No	-123	15,129
171	CLINTON	E/O	FRUIT	2571	2572	02571-02572	1,425	1,467	0.97	0.31	Yes	-42	1,764
172	CLINTON	E/O	MARKS	2564	2565	02564-02565	1,790	1,793	1.00	0.30	Yes	-3	9
173	CLINTON	N/O	MCKINLEY	5783	6119	05783-06119	577	571	1.01	0.60	Yes	6	36
174	CLINTON	E/O	SUNNYSIDE	6633	8228	06633-08228	629	293	2.15	0.60	No	336	112,896
175	CLINTON	E/O	TEMPERANCE	12148	12154	12148-12154	57	69	0.83	0.60	Yes	-12	144
176	CLINTON	W/O	WEST	2568	2569	02568-02569	1,588	1,735	0.92	0.30	Yes	-147	21,609
177	CLOVIS	S/O	CALIFORNIA	3316	5591	03316-05591	1,315	915	1.44	0.60	Yes	400	160,000
178	CLOVIS	N/O	CLINTON	2541	5394	02541-05394	2,308	1,991	1.16	0.28	Yes	317	100,489
179	CLOVIS	S/O	KINGS CANYON	2199	2822	02199-02822	1,357	2,169	0.63	0.27	No	-812	659,344
180	CLOVIS	N/O	MCKINLEY	6631	8232	06631-08232	4,071	2,360	1.73	0.27	No	1,711	2,927,521
181	CLOVIS	N/O	TULARE	3547	7051	03547-07051	2,813	2,331	1.21	0.27	Yes	482	232,324
182	COLE	E/O	AUDUBON	3176	3208	03176-03208	483	423	1.14	0.60	Yes	60	3,600
183	COPPER	E/O	CEDAR	5773	3053	05773-03053	673	603	1.12	0.60	Yes	70	4,900
184	CORNELIA	N/O	DAKOTA	2472	3410	02472-03410	123	803	0.15	0.60	No	-680	462,400
185	DAKOTA	E/O	BLACKSTONE	2078	2485	02078-02485	335	1,032	0.32	0.37	No	-697	485,809
186	DAKOTA	E/O	CEDAR	2492	5708	02492-05708	763	843	0.91	0.60	Yes	-80	6,400
187	DAKOTA	E/O	CHESTNUT	2495	5015	02495-05015	321	976	0.33	0.60	No	-655	429,025
188	DAKOTA	E/O	FOWLER	5016	12157	05016-12157	24	120	0.20	0.60	No	-96	9,216
189	DAKOTA	E/O	MAPLE	2493	2494	02493-02494	510	953	0.54	0.60	Yes	-443	196,249
190	DAKOTA	W/O	MAPLE	2493	5713	02493-05713	707	1,263	0.56	0.33	No	-556	309,136
191	DAKOTA	W/O	PEACH	2495	5015	02495-05015	321	806	0.40	0.60	No	-485	235,225
193	DAKOTA	E/O	WEST	2478	2479	02478-02479	576	574	1.00	0.60	Yes	2	4
194	DIVISADERO	W/O	41	4637	6180	04637-06180	1,771	1,757	1.01	0.30	Yes	14	196
195	DIVISADERO	E/O	FRESNO	2781	5263	02781-05263	1,839	1,475	1.25	0.31	Yes	364	132,496
196	DIVISADERO	E/O	VAN NESS	2778	5237	02778-05237	227	520	0.44	0.60	Yes	-293	85,849
197	E	N/O	STANISLAUS	5413	5501	05413-05501	49	604	0.08	0.60	No	-555	308,025
198	EAST	S/O	CALIFORNIA	2876	2884	02876-02884	281	255	1.10	0.60	Yes	26	676
199	EL DORADO	E/O	E	3489	5413	03489-05413	246	359	0.69	0.60	Yes	-113	12,769
200	EMERSON	W/O	WEST	3214	12297	03214-12297	359	367	0.98	0.60	Yes	-8	64
201	F	N/O	FRESNO	5418	5500	05418-05500	35	101	0.35	0.60	No	-66	4,356
202	FIG	S/O	NORTH	2946	8094	02946-08094	39	189	0.21	0.60	No	-150	22,500
203	FIGARDEN	E/O	BRAWLEY	4628	5060	04628-05060	790	380	2.08	0.60	No	410	168,100
206	FIRST	N/O	ALLUVIAL	3087	3088	03087-03088	846	938	0.90	0.60	Yes	-92	8,464
207	FIRST	N/O	BARSTOW	2351	5006	02351-05006	746	1,742	0.43	0.30	No	-996	992,016
208	FIRST	N/O	BULLARD	2309	2310	02309-02310	1,205	1,654	0.73	0.30	Yes	-449	201,601
209	FIRST	N/O	CLINTON	2555	2581	02555-02581	1,710	1,063	1.61	0.36	No	647	418,609
210	FIRST	N/O	DAKOTA	2467	2488	02467-02488	1,361	899	1.51	0.60	Yes	462	213,444
211	FIRST	N/O	GETTYSBURG	2411	3234	02411-03234	1,454	1,688	0.86	0.30	Yes	-234	54,756
212	FIRST	N/O	HERNDON	2250	6102	02250-06102	1,220	1,029	1.19	0.37	Yes	191	36,481
213	FIRST	N/O	MCKINLEY	2602	2630	02602-02630	1,633	1,261	1.30	0.33	Yes	372	138,384
214	FIRST	N/O	NEES	3073	3178	03073-03178	601	1,145	0.52	0.35	No	-544	295,936
215	FIRST	N/O	SAN JOSE	2351	2364	02351-02364	990	1,626	0.61	0.30	No	-636	404,496
216	FIRST	S/O	SHAW	2138	2397	02138-02397	959	1,806	0.53	0.29	No	-847	717,409
217	FIRST	N/O	SIERRA	2281	5471	02281-05471	1,072	1,879	0.57	0.29	No	-807	651,249
218	FIRST	N/O	TULARE	2764	2783	02764-02783	1,037	896	1.16	0.60	Yes	141	19,881
219	FOWLER	N/O	CHURCH	5304	5592	05304-05592	196	369	0.53	0.60	Yes	-173	29,929
220	FOWLER	N/O	CLINTON	2593	8462	02593-08462	906	376	2.41	0.60	No	530	280,900
221	FOWLER	S/O	CLINTON	6839	8238	06839-08238	926	487	1.90	0.60	No	439	192,721
222	FOWLER	S/O	CLINTON	6839	8238	06839-08238	926	526	1.76	0.60	No	400	160,000
223	FOWLER	S/O	CLINTON	6839	8238	06839-08238	926	400	2.32	0.60	No	526	276,676
224	FOWLER	N/O	DAKOTA	5016	8376	05016-08376	953	1,187	0.80	0.34	Yes	-234	54,756
225	FOWLER	N/O	JENSEN	2906	3317	02906-03317	193	501	0.39	0.60	No	-308	94,864
226	FOWLER	N/O	KINGS CANYON	7056	7082	07056-07082	564	1,149	0.49	0.35	No	-585	342,225
227	FRESNO	E/O	99	4440	5870	04440-05870	1,592	1,637	0.97	0.30	Yes	-45	2,025
228	FRESNO	N/O	CLINTON	2554	2578	02554-02578	984	1,021	0.96	0.37	Yes	-37	1,369
229	FRESNO	N/O	DIVISADERO	2763	6092	02763-06092	881	899	0.98	0.60	Yes	-18	324
230	FRESNO	E/O	E	5418	5870	05418-05870	1,516	1,148	1.32	0.35	Yes	368	135,424
232	FRESNO	N/O	GETTYSBURG	2409	3232	02409-03232	1,484	696	2.13	0.60	No	788	620,944
233	FRESNO	N/O	HERNDON	2249	6100	02249-06100	2,287	2,478	0.92	0.26	Yes	-191	36,481
234	FRESNO	S/O	HERNDON	2249	2280	02249-02280	1,181	1,536	0.77	0.31	Yes	-355	126,025
235	FRESNO	S/O	MCKINLEY	2629	2646	02629-02646	724	893	0.81	0.60	Yes	-169	28,561
236	FRESNO	N/O	NEES	5461	6099	05461-06099	309	1,422	0.22	0.31	No	-1,113	1,238,769
237	FRESNO	S/O	SHAW	2339	3232	02339-03232	1,484	1,582	0.94	0.31	Yes	-98	9,604
238	FRESNO	N/O	SHIELDS	2502	2527	02502-02527	1,022	956	1.07	0.60	Yes	66	4,356
239	FRESNO	E/O	VAN NESS	3015	3016	03015-03016	847	915	0.93	0.60	Yes	-68	4,624
240	FRIANT	N/O	AUDUBON	2221	5036	02221-05036	4,487	4,202	1.07	0.23	Yes	285	81,225
241	FRIANT	N/O	CHAMPLAIN	3304	8116	03304-08116	1,966	1,423	1.38	0.31	No	543	294,849
242	FRIANT	N/O	SHEPHERD	2220	2221	02220-02221	2,852	2,347	1.22	0.27	Yes	505	255,025
244	FRUIT	S/O	ASHLAN	5429	5430	05429-05430	565	690	0.82	0.60	Yes	-125	15,625
245	FRUIT	S/O	CALIFORNIA	2867	2880	02867-02880	195	127	1.54	0.60	Yes	68	4,624

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
246	FRUIT	N/O	CLINTON	2571	3261	02571-03261	369	853	0.43	0.60	Yes	-484	234,256
247	FRUIT	S/O	HERNDON	2245	5058	02245-05058	827	728	1.14	0.60	Yes	99	9,801
248	FRUIT	S/O	SHAW	2380	3270	02380-03270	890	309	2.88	0.60	No	581	337,561
249	FULTON	N/O	DIVISADERO	4386	4384	04386-04384	301	322	0.93	0.60	Yes	-21	441
250	FULTON	N/O	SAN JOAQUIN	5857	5861	05857-05861	86	120	0.72	0.60	Yes	-34	1,156
251	G	N/O	EL DORADO	2775	2776	02775-02776	177	108	1.64	0.60	No	69	4,761
252	G	S/O	STANISLAUS	4392	5191	04392-05191	205	371	0.55	0.60	Yes	-166	27,556
253	G	S/O	STANISLAUS	4392	5191	04392-05191	205	741	0.28	0.60	No	-536	287,296
254	G	N/O	TUOLUMNE	4392	5191	04392-05191	205	371	0.55	0.60	Yes	-166	27,556
255	G	S/O	VENTURA	2105	5879	02105-05879	309	338	0.91	0.60	Yes	-29	841
256	GARFIELD	S/O	BARSTOW	6725	6756	06725-06756	11	52	0.21	0.60	No	-41	1,681
257	GATES	N/O	BLYTHE	3297	4632	03297-04632	1,167	946	1.23	0.60	Yes	221	48,841
258	GATES	N/O	SAN JOSE	3564	4632	03564-04632	1,147	1,056	1.09	0.36	Yes	91	8,281
259	GATES	S/O	SAN JOSE	3297	4632	03297-04632	1,167	760	1.54	0.60	Yes	407	165,649
260	GETTYSBURG	E/O	BLACKSTONE	2076	2408	02076-02408	872	1,105	0.79	0.35	Yes	-233	54,289
261	GETTYSBURG	E/O	CEDAR	2413	2414	02413-02414	1,230	1,401	0.88	0.31	Yes	-171	29,241
262	GETTYSBURG	E/O	WEST	2401	3205	02401-03205	84	128	0.66	0.60	Yes	-44	1,936
263	GOLDEN STATE	N/O	ASHLAN	4635	12254	04635-12254	1,485	1,732	0.86	0.30	Yes	-247	61,009
264	GOLDEN STATE	N/O	BUCKINGHAM	4635	12254	04635-12254	1,485	1,541	0.96	0.31	Yes	-56	3,136
265	GOLDEN STATE	S/O	CHURCH	2892	5406	02892-05406	302	346	0.87	0.60	Yes	-44	1,936
266	GOLDEN STATE	S/O	JENSEN	2892	5406	02892-05406	302	385	0.78	0.60	Yes	-83	6,889
267	GOLDEN STATE	N/O	SHAW	3723	4847	03723-04847	147	822	0.18	0.60	No	-675	455,625
268	GRANTLAND	N/O	BARSTOW	3293	5388	03293-05388	315	350	0.90	0.60	Yes	-35	1,225
269	GRANTLAND	N/O	BULLARD	2294	6165	02294-06165	348	502	0.69	0.60	Yes	-154	23,716
271	H	N/O	DIVISADERO	2761	6182	02761-06182	1,024	1,015	1.01	0.37	Yes	9	81
272	H	S/O	DIVISADERO	2777	3007	02777-03007	565	130	4.35	0.60	No	435	189,225
273	H	N/O	MERCED	4419	5207	04419-05207	581	166	3.50	0.60	No	415	172,225
274	HAYES	N/O	ASHLAN	3402	5633	03402-05633	84	119	0.71	0.60	Yes	-35	1,225
275	HAZELWOOD	N/O	BUTLER	2816	2834	02816-02834	598	257	2.33	0.60	No	341	116,281
276	HERNDON	E/O	BLACKSTONE	2068	4321	02068-04321	5,061	4,169	1.21	0.23	Yes	892	795,664
277	HERNDON	W/O	BRAWLEY	3281	5106	03281-05106	2,783	2,631	1.06	0.26	Yes	152	23,104
280	HERNDON	E/O	CEDAR	2252	4999	02252-04999	3,997	4,235	0.94	0.23	Yes	-238	56,644
281	HERNDON	E/O	CHESTNUT	2253	5002	02253-05002	4,404	3,301	1.33	0.24	No	1,103	1,216,609
282	HERNDON	E/O	FIRST	2251	5004	02251-05004	4,171	5,023	0.83	0.21	Yes	-852	725,904
283	HERNDON	E/O	FRUIT	2246	5037	02246-05037	5,432	5,673	0.96	0.20	Yes	-241	58,081
284	HERNDON	W/O	MARKS	3055	5041	03055-05041	3,334	3,191	1.04	0.25	Yes	143	20,449
285	HERNDON	E/O	MAROA	2068	2248	02068-02248	4,660	3,973	1.17	0.23	Yes	687	471,969
286	HERNDON	E/O	MILLBROOK	2251	5003	02251-05003	4,769	4,208	1.13	0.23	Yes	561	314,721
287	HERNDON	W/O	PALM	2246	5037	02246-05037	5,432	5,673	0.96	0.20	Yes	-241	58,081
289	HUGHES	N/O	KEARNEY	2815	2827	02815-02827	20	14	1.43	0.60	Yes	6	36
290	HUGHES	N/O	NIELSEN	3474	5326	03474-05326	329	116	2.84	0.60	No	213	45,369
291	HUGHES	S/O	SHIELDS	2517	2549	02517-02549	706	599	1.18	0.60	Yes	107	11,449
292	HUNTINGTON	E/O	R	3034	3155	03034-03155	78	214	0.36	0.60	No	-136	18,496
293	INGRAM	N/O	HERNDON	2247	3302	02247-03302	1,188	1,102	1.08	0.35	Yes	86	7,396
294	INYO	E/O	L	3160	5219	03160-05219	428	117	3.66	0.60	No	311	96,721
295	INYO	E/O	VAN NESS	3159	5219	03159-05219	62	176	0.35	0.60	No	-114	12,996
296	ISLAND WATERPARK	N/O	SHAW	6820	5596	06820-05596	2,747	530	5.18	0.60	No	2,217	4,915,089
297	JENNIFER	E/O	GATES	6063	6064	06063-06064	1,091	680	1.60	0.60	No	411	168,921
298	JENSEN	E/O	CEDAR	2925	6296	02925-06296	1,704	1,528	1.12	0.31	Yes	176	30,976
299	JENSEN	E/O	CLOVIS	2929	5411	02929-05411	1,388	993	1.40	0.60	Yes	395	156,025
300	JENSEN	W/O	CORNELIA	2908	5135	02908-05135	208	251	0.83	0.60	Yes	-43	1,849
301	JENSEN	E/O	ELM	2109	5730	02109-05730	899	1,568	0.57	0.31	No	-669	447,561
302	JENSEN	W/O	FRUIT	2913	5146	02913-05146	256	292	0.88	0.60	Yes	-36	1,296
303	JENSEN	E/O	GOLDEN STATE	2923	8440	02923-08440	2,024	2,041	0.99	0.28	Yes	-17	289
304	JENSEN	E/O	MAPLE	2926	3531	02926-03531	1,927	1,459	1.32	0.31	No	468	219,024
305	JENSEN	E/O	PEACH	2928	6200	02928-06200	1,376	1,634	0.84	0.30	Yes	-258	66,564
306	JENSEN	W/O	WILLOW	2927	5276	02927-05276	1,326	1,207	1.10	0.33	Yes	119	14,161
307	KEARNEY	W/O	FRESNO	2833	8410	02833-08410	605	328	1.84	0.60	No	277	76,729
308	KEARNEY	E/O	HUGHES	2827	2828	02827-02828	54	136	0.40	0.60	No	-82	6,724
309	KEARNEY	E/O	MARKS	2826	5329	02826-05329	95	100	0.95	0.60	Yes	-5	25
310	KEARNEY	E/O	WEST	2829	8418	02829-08418	205	148	1.39	0.60	Yes	57	3,249
312	KINGS CANYON	E/O	CEDAR	2189	2190	02189-02190	806	1,379	0.58	0.32	No	-573	328,329
313	KINGS CANYON	W/O	CLOVIS	2198	2199	02198-02199	1,535	1,684	0.91	0.30	Yes	-149	22,201
314	KINGS CANYON	E/O	MAPLE	2193	2194	02193-02194	736	1,273	0.58	0.33	No	-537	288,369
315	LANE	E/O	CHESTNUT	2820	5317	02820-05317	574	405	1.42	0.60	Yes	169	28,561
316	LANE	W/O	PEACH	2821	3555	02821-03555	1,640	304	5.39	0.60	No	1,336	1,784,896
317	LOS ANGELES	E/O	L	3042	3263	03042-03263	195	286	0.68	0.60	Yes	-91	8,281
318	M	N/O	CALAVERAS	4416	5240	04416-05240	86	96	0.90	0.60	Yes	-10	100
321	M	N/O	MERCED	2183	5225	02183-05225	36	139	0.26	0.60	No	-103	10,609
322	M	S/O	VENTURA	2102	3039	02102-03039	929	690	1.35	0.60	Yes	239	57,121
323	MAPLE	S/O	CALIFORNIA	3506	12170	03506-12170	785	801	0.98	0.60	Yes	-16	256
324	MAPLE	N/O	CLINTON	2537	2559	02537-02559	624	536	1.16	0.60	Yes	88	7,744
325	MAPLE	N/O	GETTYSBURG	2416	3143	02416-03143	603	297	2.03	0.60	No	306	93,636
326	MAPLE	S/O	MCKINLEY	2685	2695	02685-02695	887	1,056	0.84	0.36	Yes	-169	28,561
328	MAPLE	N/O	TEAGUE	3070	4598	03070-04598	340	648	0.52	0.60	Yes	-308	94,864
329	MAPLE	N/O	TULARE	2789	3488	02789-03488	1,736	1,228	1.41	0.33	No	508	258,064
330	MARKS	S/O	CALIFORNIA	2863	2903	02863-02903	253	131	1.93	0.60	No	122	14,884
331	MARKS	N/O	CLINTON	4276	12241	04276-12241	688	876	0.79	0.60	Yes	-188	35,344
332	MARKS	S/O	HERNDON	3055	6060	03055-06060	347	1,088	0.32	0.36	No	-741	549,081
333	MARKS	N/O	KEARNEY	2826	5129	02826-05129	305	265	1.15	0.60	Yes	40	1,600

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334	MARKS	N/O	NIELSEN	5132	5133	05132-05133	234	529	0.44	0.60	Yes	-295	87,025
335	MARKS	S/O	SHAW	2375	2394	02375-02394	1,370	1,699	0.81	0.30	Yes	-329	108,241
336	MAROA	S/O	BULLARD	2306	2332	02306-02332	245	919	0.27	0.60	No	-674	454,276
337	MAROA	N/O	CLINTON	2576	2552	02576-02552	463	461	1.00	0.60	Yes	2	4
338	MAROA	S/O	HERNDON	2248	2275	02248-02275	336	694	0.48	0.60	Yes	-358	128,164
339	MAROA	S/O	SHAW	2384	2396	02384-02396	495	590	0.84	0.60	Yes	-95	9,025
340	MAROA	N/O	SIERRA	2274	2275	02274-02275	301	693	0.43	0.60	Yes	-392	153,664
341	MARTIN LUTHER KING JR	S/O	CALIFORNIA	2704	2872	02704-02872	67	360	0.19	0.60	No	-293	85,849
342	MCKINLEY	E/O	BLACKSTONE	2084	3249	02084-03249	1,788	1,798	0.99	0.30	Yes	-10	100
343	MCKINLEY	E/O	CEDAR	2634	5711	02634-05711	2,121	1,707	1.24	0.30	Yes	414	171,396
344	MCKINLEY	E/O	CHESTNUT	2636	8226	02636-08226	1,581	1,204	1.31	0.33	Yes	377	142,129
345	MCKINLEY	W/O	CLOVIS	2637	2638	02637-02638	1,317	838	1.57	0.60	Yes	479	229,441
346	MCKINLEY	E/O	FIRST	2630	2631	02630-02631	1,759	1,430	1.23	0.31	Yes	329	108,241
347	MCKINLEY	E/O	MARKS	2612	2613	02612-02613	982	215	4.57	0.60	No	767	588,289
348	MCKINLEY	E/O	PALM	2606	2621	02606-02621	1,167	979	1.19	0.60	Yes	188	35,344
349	MCKINLEY	E/O	VAN NESS	2624	2625	02624-02625	1,965	1,281	1.53	0.33	No	684	467,856
350	MCKINLEY	E/O	WEST	2617	2618	02617-02618	1,184	1,128	1.05	0.35	Yes	56	3,136
351	MILBURN	S/O	HERNDON	6058	12269	06058-12269	672	1,211	0.55	0.33	No	-539	290,521
352	MILBURN	N/O	SPRUCE	5526	5831	05526-05831	827	1,236	0.67	0.33	No	-409	167,281
353	MILBURN	S/O	SPRUCE	5526	8043	05526-08043	606	723	0.84	0.60	Yes	-117	13,689
354	MILLBROOK	S/O	ASHLAN	2449	2468	02449-02468	510	597	0.85	0.60	Yes	-87	7,569
355	MILLBROOK	N/O	CLINTON	2583	6192	02583-06192	6	168	0.04	0.60	No	-162	26,244
356	MILLBROOK	N/O	NEES	3074	3076	03074-03076	647	792	0.82	0.60	Yes	-145	21,025
357	MILLBROOK	S/O	SHAW	2975	8112	02975-08112	477	373	1.28	0.60	Yes	104	10,816
358	MINARETS	E/O	BLACKSTONE	2066	4597	02066-04597	561	1,459	0.38	0.31	No	-898	806,404
359	NEES	E/O	AUDUBON	6528	6560	06528-06560	2,224	1,983	1.12	0.28	Yes	241	58,081
360	NEES	E/O	CEDAR	2230	3078	02230-03078	1,813	1,699	1.07	0.30	Yes	114	12,996
361	NEES	E/O	FIRST	2229	3084	02229-03084	1,494	2,388	0.63	0.27	No	-894	799,236
362	NEES	E/O	FRESNO	3114	3115	03114-03115	1,603	2,160	0.74	0.27	Yes	-557	310,249
363	NEES	W/O	FRESNO	2228	5835	02228-05835	1,496	2,322	0.64	0.27	No	-826	682,276
364	NEES	E/O	MAPLE	3080	3097	03080-03097	1,321	1,729	0.76	0.30	Yes	-408	166,464
365	NEES	E/O	WILLOW	2232	4929	02232-04929	1,113	1,198	0.93	0.34	Yes	-85	7,225
366	NIELSEN	E/O	WEST	2772	2773	02772-02773	239	120	1.99	0.60	No	119	14,161
367	NORTH	W/O	CEDAR	3690	5321	03690-05321	716	551	1.30	0.60	Yes	165	27,225
368	NORTH	W/O	CHERRY	2948	5733	02948-05733	221	283	0.78	0.60	Yes	-62	3,844
369	NORTH	E/O	EAST	2951	3152	02951-03152	222	514	0.43	0.60	Yes	-292	85,264
370	NORTH	E/O	ELM	2948	5733	02948-05733	221	521	0.42	0.60	Yes	-300	90,000
371	NORTH	W/O	ELM	2110	2947	02110-02947	206	754	0.27	0.60	No	-548	300,304
372	NORTH	W/O	GOLDEN STATE	2953	2954	02953-02954	568	444	1.28	0.60	Yes	124	15,376
373	NORTH	E/O	MARTIN LUTHER KING JR	2946	2947	02946-02947	206	312	0.66	0.60	Yes	-106	11,236
374	NORTH	E/O	PEACH	2956	8086	02956-08086	215	169	1.27	0.60	Yes	46	2,116
375	NORTH	W/O	WALNUT	2945	3019	02945-03019	65	172	0.38	0.60	No	-107	11,449
376	NORTH	W/O	WEST	3318	8078	03318-08078	60	101	0.59	0.60	Yes	-41	1,681
377	O	S/O	TULARE	4610	5234	04610-05234	275	243	1.13	0.60	Yes	32	1,024
378	O	S/O	VENTURA	4612	6184	04612-06184	230	457	0.50	0.60	Yes	-227	51,529
379	OLIVE	W/O	99	4364	4366	04364-04366	95	724	0.13	0.60	No	-629	395,641
380	OLIVE	E/O	CEDAR	2683	2684	02683-02684	313	841	0.37	0.60	No	-528	278,784
381	OLIVE	W/O	CLOVIS	2692	5491	02692-05491	303	401	0.76	0.60	Yes	-98	9,604
382	OLIVE	E/O	FIRST	2679	2680	02679-02680	489	948	0.52	0.60	Yes	-459	210,681
383	OLIVE	E/O	GOLDEN STATE	2642	2667	02642-02667	483	435	1.11	0.60	Yes	48	2,304
385	OLIVE	W/O	WEBER	2642	2667	02642-02667	483	498	0.97	0.60	Yes	-15	225
386	ORANGE	N/O	CALIFORNIA	2854	2878	02854-02878	111	328	0.34	0.60	No	-217	47,089
387	ORANGE	S/O	CALIFORNIA	2878	3147	02878-03147	310	279	1.11	0.60	Yes	31	961
388	ORANGE	S/O	NORTH	3528	8102	03528-08102	100	45	2.22	0.60	No	55	3,025
389	P	S/O	TULARE	2133	5236	02133-05236	55	379	0.15	0.60	No	-324	104,976
390	P	S/O	VENTURA	6184	4461	06184-04461	88	147	0.60	0.60	Yes	-59	3,481
391	PALM	S/O	BELMONT	2724	5185	02724-05185	607	423	1.43	0.60	Yes	184	33,856
393	PALM	N/O	BULLARD	2303	2304	02303-02304	1,627	1,691	0.96	0.30	Yes	-64	4,096
394	PALM	N/O	CLINTON	2551	2573	02551-02573	1,333	970	1.37	0.60	Yes	363	131,769
395	PALM	N/O	DAKOTA	2463	2482	02463-02482	1,477	1,045	1.41	0.37	No	432	186,624
396	PALM	N/O	HERNDON	2246	6536	02246-06536	2,933	3,138	0.93	0.25	Yes	-205	42,025
397	PALM	S/O	HERNDON	2246	5065	02246-05065	1,471	1,631	0.90	0.30	Yes	-160	25,600
398	PALM	N/O	MCKINLEY	2606	2621	02606-02621	1,167	984	1.19	0.60	Yes	183	33,489
399	PALM	S/O	SHAW	2984	5159	02984-05159	18	1,153	0.02	0.34	No	-1,135	1,288,225
400	PEACH	S/O	ASHLAN	2454	5014	02454-05014	992	1,187	0.84	0.34	Yes	-195	38,025
401	PEACH	N/O	BELMONT	2745	5609	02745-05609	1,808	2,324	0.78	0.27	Yes	-516	266,256
402	PEACH	S/O	CALIFORNIA	3321	3537	03321-03537	734	964	0.76	0.60	Yes	-230	52,900
403	PEACH	N/O	CHURCH	2901	3535	02901-03535	642	631	1.02	0.60	Yes	11	121
404	PEACH	S/O	OLIVE	2690	5700	02690-05700	1,324	1,437	0.92	0.31	Yes	-113	12,769
405	PEACH	N/O	TULARE	2793	3546	02793-03546	1,331	1,355	0.98	0.32	Yes	-24	576
406	PERRIN	W/O	MAPLE	4595	5515	04595-05515	650	771	0.84	0.60	Yes	-121	14,641
407	PERRIN	N/O	SHEPHERD	3309	3310	03309-03310	1,356	1,626	0.83	0.30	Yes	-270	72,900
408	POLK	S/O	HERNDON	3164	6625	03164-06625	463	849	0.55	0.60	Yes	-386	148,996
409	POLK	S/O	SHAW	2370	6295	02370-06295	1,199	275	4.36	0.60	No	924	853,776
410	R	N/O	HUNTINGTON	3034	5258	03034-05258	194	524	0.37	0.60	No	-330	108,900
411	R	N/O	INYO	3034	3155	03034-03155	78	483	0.16	0.60	No	-405	164,025
412	R	N/O	TULARE	3022	3031	03022-03031	114	582	0.20	0.60	No	-468	219,024
413	SAN JOSE	E/O	GATES	3397	4633	03397-04633	21	200	0.11	0.60	No	-179	32,041
414	SAN PABLO	N/O	DIVISADERO	4388	4389	04388-04389	128	84	1.52	0.60	Yes	44	1,936
415	SANTA FE	S/O	PALO ALTO	6058	12269	06058-12269	672	1,089	0.62	0.36	No	-417	173,889

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes													
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
416	SHAW	E/O	ANGUS	2137	2138	02137-02138	2,957	1,356	2.18	0.32	No	1,601	2,563,201
417	SHAW	W/O	ANGUS	2136	2137	02136-02137	3,227	3,164	1.02	0.25	Yes	63	3,969
418	SHAW	E/O	BLACKSTONE	2074	2135	02074-02135	3,816	3,486	1.09	0.24	Yes	330	108,900
419	SHAW	W/O	BRAWLEY	3117	3574	03117-03574	2,154	2,199	0.98	0.27	Yes	-45	2,025
420	SHAW	E/O	CEDAR	2140	2141	02140-02141	2,723	3,411	0.80	0.24	Yes	-688	473,344
421	SHAW	W/O	GOLDEN STATE	2371	2372	02371-02372	1,768	2,543	0.70	0.26	No	-775	600,625
422	SHAW	W/O	HAYES	3301	3398	03301-03398	609	1,004	0.61	0.37	No	-395	156,025
423	SHAW	W/O	LOLA	3399	12245	03399-12245	662	1,008	0.66	0.37	Yes	-346	119,716
424	SHAW	E/O	MARKS	2375	5426	02375-05426	2,584	2,939	0.88	0.26	Yes	-355	126,025
425	SHAW	W/O	VAN NESS	2377	4559	02377-04559	3,070	3,160	0.97	0.25	Yes	-90	8,100
426	SHAW	E/O	WEST	2378	2379	02378-02379	3,142	2,961	1.06	0.26	Yes	181	32,761
427	SHEPHERD	E/O	CEDAR	2222	3062	02222-03062	649	1,268	0.51	0.33	No	-619	383,161
428	SHEPHERD	E/O	FRIANT	2221	3059	02221-03059	1,681	2,316	0.73	0.27	No	-635	403,225
429	SHEPHERD	W/O	MAPLE	3062	3063	03062-03063	649	1,182	0.55	0.34	No	-533	284,089
430	SHIELDS	E/O	BLACKSTONE	2080	2526	02080-02526	3,039	2,481	1.22	0.26	Yes	558	311,364
431	SHIELDS	E/O	BLYTHE	2547	3346	02547-03346	286	418	0.68	0.60	Yes	-132	17,424
432	SHIELDS	E/O	CEDAR	2534	5709	02534-05709	1,998	1,553	1.29	0.31	Yes	445	198,025
433	SHIELDS	E/O	FOWLER	3142	5024	03142-05024	473	838	0.56	0.60	Yes	-365	133,225
434	SHIELDS	W/O	SUNNYSIDE	2542	9221	02542-09221	1,188	937	1.27	0.60	Yes	251	63,001
435	SHIELDS	E/O	TEMPERANCE	2544	5018	02544-05018	207	131	1.58	0.60	Yes	76	5,776
436	SHIELDS	E/O	VALENTINE	6171	6173	06171-06173	623	686	0.91	0.60	Yes	-63	3,969
437	SHIELDS	E/O	WEBER	2516	5104	02516-05104	359	393	0.91	0.60	Yes	-34	1,156
438	SHIELDS	E/O	WEST	2519	2520	02519-02520	1,365	826	1.65	0.60	No	539	290,521
439	SIERRA	E/O	BLACKSTONE	2277	12210	02277-12210	592	1,223	0.48	0.33	No	-631	398,161
440	SIERRA	E/O	CEDAR	5474	5481	05474-05481	2	139	0.01	0.60	No	-137	18,769
441	SIERRA	W/O	POLK	5631	6245	05631-06245	0	259	0.00	0.60	No	-259	67,081
442	SIERRA	E/O	WEST	2269	2270	02269-02270	88	605	0.15	0.60	No	-517	267,289
443	SIXTH	N/O	TULARE	2766	2785	02766-02785	67	189	0.35	0.60	No	-122	14,884
444	SPRUCE	W/O	BLYTHE	5039	6057	05039-06057	545	156	3.49	0.60	No	389	151,321
447	TEAGUE	E/O	MAPLE	3070	5469	03070-05469	276	877	0.31	0.60	No	-601	361,201
448	TEILMAN	N/O	NIELSEN	2754	2773	02754-02773	197	135	1.46	0.60	Yes	62	3,844
449	TEMPERANCE	S/O	BUTLER	5303	12198	05303-12198	653	545	1.20	0.60	Yes	108	11,664
450	TEMPERANCE	N/O	CLINTON	2544	8360	02544-08360	663	663	1.00	0.60	Yes	0	0
451	TEMPERANCE	N/O	SHIELDS	2544	8386	02544-08386	1,125	214	5.26	0.60	No	911	829,921
452	THORNE	N/O	KEARNEY	2177	2831	02177-02831	128	176	0.73	0.60	Yes	-48	2,304
453	TRINITY	N/O	STANISLAUS	8412	8428	08412-08428	183	83	2.20	0.60	No	100	10,000
456	TULARE	E/O	41	4408	4640	04408-04640	1,509	2,410	0.63	0.26	No	-901	811,801
457	TULARE	E/O	CEDAR	2787	2788	02787-02788	1,521	1,023	1.49	0.37	No	498	248,004
458	TULARE	E/O	CHESTNUT	2791	5315	02791-05315	747	578	1.29	0.60	Yes	169	28,561
459	TULARE	E/O	E	5419	5421	05419-05421	214	244	0.88	0.60	Yes	-30	900
460	TULARE	E/O	N	3510	4610	03510-04610	1,340	769	1.74	0.60	No	571	326,041
461	TULARE	W/O	R	5253	5254	05253-05254	1,827	1,111	1.64	0.35	No	716	512,656
462	TULARE	E/O	U	4409	4638	04409-04638	2,150	1,737	1.24	0.30	Yes	413	170,569
464	U	S/O	MARIPOSA	4409	5250	04409-05250	505	284	1.78	0.60	No	221	48,841
465	U	N/O	TULARE	4409	5250	04409-05250	505	430	1.17	0.60	Yes	75	5,625
466	VALENTINE	S/O	ASHLAN	3254	12176	03254-12176	249	231	1.08	0.60	Yes	18	324
467	VALENTINE	S/O	BARSTOW	3563	3566	03563-03566	30	245	0.12	0.60	No	-215	46,225
468	VALENTINE	S/O	CALIFORNIA	2862	5137	02862-05137	181	48	3.77	0.60	No	133	17,689
469	VALENTINE	S/O	CLINTON	2563	3442	02563-03442	39	151	0.26	0.60	No	-112	12,544
470	VALENTINE	S/O	MCKINLEY	2660	3467	02660-03467	7	106	0.07	0.60	No	-99	9,801
471	VAN NESS	N/O	41	4467	6186	04467-06186	935	476	1.96	0.60	No	459	210,681
472	VAN NESS	S/O	CALIFORNIA	2875	2882	02875-02882	182	192	0.95	0.60	Yes	-10	100
474	VAN NESS	N/O	DIVISADERO	2778	2762	02778-02762	483	201	2.40	0.60	No	282	79,524
475	VAN NESS	S/O	FRESNO	3026	3494	03026-03494	473	673	0.70	0.60	Yes	-200	40,000
476	VAN NESS	N/O	HERNDON	2243	5043	02243-05043	591	303	1.95	0.60	No	288	82,944
477	VAN NESS	S/O	MCKINLEY	2645	2624	02645-02624	180	542	0.33	0.60	No	-362	131,044
478	VAN NESS	N/O	SAN JOAQUIN	3010	8406	03010-08406	459	503	0.91	0.60	Yes	-44	1,936
479	VAN NESS	N/O	SHAW	2988	4852	02988-04852	335	406	0.83	0.60	Yes	-71	5,041
480	VAN NESS	N/O	SIERRA	2268	3182	02268-03182	756	414	1.83	0.60	No	342	116,964
481	VAN NESS	N/O	STANISLAUS	3010	4393	03010-04393	427	543	0.79	0.60	Yes	-116	13,456
482	VAN NESS	N/O	STANISLAUS	3010	4393	03010-04393	427	526	0.81	0.60	Yes	-99	9,801
483	VAN NESS	S/O	VENTURA	2104	3037	02104-03037	888	674	1.32	0.60	Yes	214	45,796
484	VENTURA	W/O	41	2184	5256	02184-05256	1,523	1,215	1.25	0.33	Yes	308	94,864
485	VENTURA	E/O	E	2106	5424	02106-05424	1,303	965	1.35	0.60	Yes	338	114,244
487	VENTURA	E/O	H	5223	8554	05223-08554	1,660	1,087	1.53	0.36	No	573	328,329
489	VENTURA	E/O	MAYOR	3500	5497	03500-05497	409	367	1.11	0.60	Yes	42	1,764
490	VENTURA	E/O	P	2100	5255	02100-05255	1,520	1,076	1.41	0.36	No	444	197,136
491	VENTURA	E/O	VAN NESS	2103	2104	02103-02104	1,046	930	1.12	0.60	Yes	116	13,456
492	WALNUT	S/O	CALIFORNIA	3586	6751	03586-06751	160	275	0.58	0.60	Yes	-115	13,225
493	WALNUT	S/O	CHURCH	2886	5166	02886-05166	81	111	0.73	0.60	Yes	-30	900
495	WALNUT	S/O	GROVE	2915	5166	02915-05166	49	110	0.45	0.60	Yes	-61	3,721
497	WALNUT	N/O	JENSEN	2915	5166	02915-05166	49	174	0.28	0.60	No	-125	15,625
498	WALNUT	N/O	NORTH	2945	3027	02945-03027	27	16	1.69	0.60	No	11	121
500	WEBER	N/O	OLIVE	2667	2698	02667-02698	886	806	1.10	0.60	Yes	80	6,400
501	WEBER	E/O	VALENTINE	3268	5111	03268-05111	1,010	918	1.10	0.60	Yes	92	8,464
502	WEST	N/O	ASHLAN	2438	3214	02438-03214	1,933	1,418	1.36	0.31	No	515	265,225
504	WEST	S/O	CALIFORNIA	2865	3029	02865-03029	134	82	1.63	0.60	No	52	2,704
505	WEST	N/O	CLINTON	2569	3260	02569-03260	1,671	957	1.75	0.60	No	714	509,796
506	WEST	S/O	DAKOTA	2478	2499	02478-02499	1,495	1,388	1.08	0.32	Yes	107	11,449
507	WEST	N/O	GETTYSBURG	2401	3123	02401-03123	1,771	1,714	1.03	0.30	Yes	57	3,249

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared	
508	WEST	S/O	HERNDON	2244	3145	02244-03145	620	1,079	0.57	0.36	No	-459	210,681	
509	WEST	S/O	KEARNEY	2095	2829	02095-02829	81	148	0.55	0.60	Yes	-67	4,489	
510	WEST	N/O	MCKINLEY	2596	2617	02596-02617	1,387	981	1.41	0.60	Yes	406	164,836	
511	WEST	N/O	SANTA FE	2401	12298	02401-12298	1,766	1,418	1.25	0.31	Yes	348	121,104	
512	WEST	N/O	SHAW	4534	2010	04534-02010	3,451	1,481	2.33	0.31	No	1,970	3,880,900	
513	WEST	N/O	SIERRA	2269	3145	02269-03145	680	944	0.72	0.60	Yes	-264	69,696	
514	WEST	S/O	SIERRA	2269	3187	02269-03187	742	1,068	0.69	0.36	Yes	-326	106,276	
515	WHITES BRIDGE	E/O	WEST	2176	5754	02176-05754	131	240	0.55	0.60	Yes	-109	11,881	
516	WILLOW	S/O	CALIFORNIA	3534	3536	03534-03536	238	286	0.83	0.60	Yes	-48	2,304	
517	WILLOW	S/O	HERNDON	2254	5511	02254-05511	2,298	2,240	1.03	0.27	Yes	58	3,364	
518	WILLOW	N/O	SPRUCE	3100	3111	03100-03111	1,572	1,963	0.80	0.28	Yes	-391	152,881	
519	WILLOW	N/O	TEAGUE	3072	5468	03072-05468	848	1,687	0.50	0.30	No	-839	703,921	
520	WISHON	N/O	CLINTON	4352	4354	04352-04354	174	624	0.28	0.60	No	-450	202,500	
521	WISHON	N/O	FLORADORA	4355	4356	04355-04356	207	1,074	0.19	0.36	No	-867	751,689	
522	ELM AVE	S/O	CALIFORNIA	2120	6090	02120-06090	325	466	0.70	0.60	Yes	-141	19,881	
						Subtotal	**463,732**	**476,825**			**Model/Count Ratio =**	**0.97**	Targets	
											Percent Within Target Deviation =	**60%**	>75%	
											Percent Root Mean Square Error =	**46%**	<40%	
											Correlation Coefficient =	**0.88**	>0.88	

ATTACHMENT B

DMEIR Table 5.14-2
Roadway Functional Class and Peak Hour Level-of-Service Thresholds

It should be noted that this traditional methodology used to analyze the roadway system does not consider the potential impact on walking, bicycling, and transit. Pedestrians, bicyclists, and transit riders are all users of the roadway system but may not be fully recognized in the traffic operations analysis and the calculation of LOS. The LOS thresholds in Table 5.14-2 are based on driver's comfort and convenience. Identifying the need for roadway improvements based on the resulting roadway LOS can have unintended impacts to other modes such as increasing the walking time for pedestrians. In evaluating the roadway system, a lower vehicle LOS may be desired when balanced against other community values related to resource protection, social equity, economic development, and consideration of pedestrians, bicyclists, and transit users.

Table 5.14-2: Roadway Functional Class and Peak Hour Level-of-Service Thresholds

Functional Class	Median	Lanes	Peak Hour Level of Service Capacity Threshold				
			A	B	C	D	E
Freeway	N/A[1]	4	2,720	4,460	6,630	7,720	8,630
		3+Aux[2]	2,360	3,860	5,640	6,730	7,530
		3	2,000	3,270	4,660	5,740	6,430
		2+Aux	1,650	2,700	3,850	4,760	5,340
		2	1,300	2,130	3,050	3,790	4,260
State Expressway	Divided	6	2,410	3,960	5,730	7,450	8,450
		4	1,610	2,650	3,810	4,960	5,630
		2	810	1,340	1,890	2,470	2,810
City Expressway	Raised Median	6			1,860	6,170	6,520
		5			1,520	5,110	5,430
		4			1,180	4,050	4,340
		2			520	1,910	2,160
Super Arterial	Raised Median	6				4,910	6,240
		5				4,040	5,195
		4				3,170	4,150
Arterial	Raised Median	8			2,120	7,070	7,490
		6			1,560	5,270	5,610
		5			1,280	4,370	4,670
		4			1,000	3,470	3,730
		3			720	2,555	2,795
		2			440	1,640	1,860
	TWLTL[3]	4			940	3,290	3,550
		2			420	1,550	1,760

Functional Class	Median	Lanes	Peak Hour Level of Service Capacity Threshold				
			A	B	C	D	E
	Undivided	4			770	2,740	2,980
		2			340	1,270	1,480
Collector	TWLTL	4			940	3,290	3,550
		2			420	1,550	1,760
	Undivided	4			770	2,740	2,980
		2			340	1,270	1,480
One-Way	Undivided	3		1,960	2,240	2,430	2,610
		2		1,250	1,490	1,620	1,740
		1		550	740	800	870
Rural State Highway	Undivided	2	310	570	1,020	1,730	2,470
Rural Arterial	Divided	4			1,950	3,580	3,780
	Undivided	2			570	1,230	1,310
Rural Collector/Local	Undivided	2			700	930	1,000

Notes:
[1] N/A - Not applicable for operational class
[2] Aux - Auxiliary Lane
[3] TWLTL – Two-way Left-turn Lane
- LOS is not achievable because of type of facility.
Source: Fehr & Peers 2012.

Exhibit 5.14-2 shows existing AM peak hour traffic volumes (two-way total) and LOS (See Appendix H-3 for detail) and Exhibit 5.14-3 shows existing PM peak hour traffic volumes (two-way total) and LOS (See Appendix H-4 for detail). Exhibit 5.14-4 illustrates the planned roadway number of lanes.

Most roadways operate at LOS D or better during the AM and PM peak hours, except for the following, which operate at LOS E and F:

City of Fresno

- Willow Avenue – Copper to Behymer Avenue (LOS E during the PM peak hour)
- Willow Avenue – Behymer Avenue to Shepherd Avenue (LOS F during the PM peak hour)
- Golden State Boulevard – Shaw Avenue to Swift Avenue (LOS F during the PM peak hour)
- Golden State Boulevard – Motel Drive to Ashlan Avenue (LOS E during the PM peak hour)
- Nees Avenue – Jordan Avenue to Paula Avenue (LOS E during the PM peak hour)
- Cornelia Avenue – Ashlan Avenue to Griffith Way (LOS E during the PM peak hour)
- Marks Avenue – Dakota Avenue to Weber Avenue (LOS E during the PM peak hour)
- Clinton Avenue – Valentine Avenue to Marks Avenue (LOS F during the PM peak hour)

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May 7, 2021

Ms. Ashley Werner, Esq.
Leadership Counsel for Justice and Accountability
2210 San Joaquin Street
Fresno, CA 93721

Subject: ***Recirculated Public Review Draft Program Environmental Impact Report***
Fresno General Plan, Fresno, California

Dear Ms. Werner:

As requested, Griffin Cove Transportation Consulting, PLLC (GCTC) has completed a review of the Recirculated Program Environmental Impact Report (RPEIR) completed with respect to the City of Fresno General Plan ("General Plan") in Fresno, California. (Reference: LSA, *Fresno General Plan Recirculated Public Review Draft Program Environmental Impact Report*, March 2021.) According to the City's Notice of Availability for the RPEIR, it was prepared in response to "new information made available" subsequent to circulation of the previous environmental documentation.

On August 7, 2020, GCTC prepared a letter commenting on the Final Program Environmental Impact Report (FPEIR) for the General Plan. In large part, the new information in the RPEIR relates to properly incorporating analyses of vehicle-miles-traveled, as was addressed in our earlier letter.

Appendix J to the RPEIR presents the traffic impact analysis that was incorporated into the document. We note that the technical analysis presented there is unchanged from the previous environmental documents. (Reference: LSA, *City of Fresno General Plan Program EIR Traffic Impact Analysis*, February 2020.)

Our review focused on the technical adequacy of the RPEIR documents, particularly with respect to the analysis of pedestrian and bicycle safety impacts.

BACKGROUND

The adopted General Plan includes policies and provisions emphasizing and encouraging pedestrian and bicycle activity. Examples of this include the following:

- RPEIR Table 3.2.A (p. 3-9), which includes General Plan policies that would be modified or added as a result of establishing VMT as a metric for environmental analysis, contains three General Plan policies relating to consideration of pedestrians and bicyclists and, in general, development of a multi-modal transportation system, with pertinent excerpts shown below:
  - Policy MT-1-k
    - "**Multi-Modal Level of Service Standards.** Develop and use a tiered system of flexible, multi-modal Level of Service standards for streets designated by the Circulation Diagram (Figure MT-1). . . . Establish minimum acceptable service levels for other modes and use them in the development ~~and environmental~~ review process." [Emphasis not added.]
  - Policy MT-1-m
    - "Give priority to maintaining pedestrian service first, followed by transit service, and then by vehicle LOS [level of service], where conflicts between objectives for service capacity between different modes occur."

- "Identify pedestrian-priority and transit-priority streets where these modes would have priority in order to apply a multi-modal priority system, as part of the General Plan implementation."

- Policy MT-4-g
  - "**Advocacy for Bike Accommodation.** Advocate for the accommodation of bike facilities in new or upgraded State Route interchanges and railroad construction projects, and construction of bicycle crossings of freeways and railroads." [Emphasis not added.]

- Beginning at p. 3-10, the RPEIR describes a range of General Plan text changes. Within that section, the following General Plan text appears:

  > ***Multi-Modal LOS.*** *As mentioned above, the General Plan proposes a balanced transportation system that serves public transit, bicyclists and pedestrians as well as motor vehicles. . . . Fresno can create a transportation system that performs well for all modes, in part by measuring performance with qualitative indicators for each mode based on inputs covering facility design, facility controls, and volumes. This multi-modal LOS concept is illustrated in Table 4-2*. (RPEIR, p. 3-10) [Emphasis not added.]

  We should note that a search of the RPEIR (including Appendix J) failed to locate Table 4-2, so the specific characteristics of the proposed multi-modal LOS concept are unknown.

- The land use categories incorporated in the General Plan are described beginning at RPEIR p. 3-11. Among the pertinent references are the following:
  - "Medium High Density residential is . . . intended to support a fine-grain, pedestrian scale." (p. 3-15)
  - "Main Street commercial encourages a traditional 'Main Street' character with . . . pedestrian-oriented design." (p. 3-15)
  - "Community commercial is intended for pedestrian-oriented commercial development . . ." (p. 3-15)
  - "The Corridor/Center Mixed Use designation is higher intensity . . . Development will facilitate the transformation of existing transportation corridors into vibrant, highly walkable areas with broad, pedestrian-friendly sidewalks . . . " (p. 3-17)
  - The Neighborhood Mixed Use designation . . . provides for mixed-use districts of local-serving, pedestrian-oriented commercial development . . ." (p. 3-17)

- Other General Plan policies also address the desire for additional pedestrian and bicycle activity. Selected examples include:
  - "**Policy UF-14-a: Design Guidelines for Walkability.** Develop and use design guidelines and standards for a walkable and pedestrian-scaled environment with a network of streets and connections for pedestrians and bicyclists, as well as transit and autos." (p. 4.3-31) [Emphasis not added.]
  - "**Policy UF-14-b: Local Street Connectivity.** Design local roadways to connect throughout neighborhoods . . . Create access for pedestrians and bicycles . . ." (p. 4.3-31) [Emphasis not added.]

- "**Policy MT-1-g: Complete Streets Concept Implementation.** Provide transportation facilities based upon a Complete Streets concept that facilitates the balanced use of all viable travel modes (pedestrians, bicyclists, motor vehicle and transit users) . . ." (p. 4.3-37) [Emphasis not added.]
- "**Policy MT-1-h: Update Standards for Complete Streets.** Update the City's Engineering and Street Design Standards to ensure that roadway and streetscape design specifications reflect the Complete Streets concept, while also addressing the needs of . . . bike lanes, pedestrian accommodation . . ." (p. 4.3-38) [Emphasis not added.]
- "***Objective MT-4:*** Establish and maintain a continuous, safe, and easily accessible bikeways system throughout the metropolitan area . . ." (P. 4.3-39) [Emphasis not added.]
- "***Objective MT-5:*** Establish a well-integrated network of pedestrian facilities to accommodate safe, convenient, practical, and inviting travel by walking, including for those with physical mobility and vision impairments." (p. 4.3-40) [Emphasis not added.]
- "***Objective MT-6:*** Establish a network of multi-purpose pedestrian and bicycle paths . . ." (p. 4.3-41) [Emphasis not added.]

In short, the General Plan places an emphasis on the importance of pedestrian and bicycle travel in Fresno's future. However, as described below, our review of the RPEIR transportation analysis revealed that it has largely ignored these non-motorized travel modes.

RECIRCULATED PROGRAM ENVIRONMENTAL IMPACT REPORT REVIEW

The RPEIR transportation analysis is presented in Section 4.16. It is based on the detailed LSA technical report referenced above and presented as Appendix J. Although the RPEIR represents a substantial modification to the transportation analysis, which more fully considers the impact of the General Plan on vehicle-miles-traveled (VMT), the bulk of the analysis still focuses on roadway segment level of service (LOS).

The level of service analysis methodology is described at p. 4.16-4. As noted there:

> *This methodology does not consider potential impacts on walking, bicycling, and transit. Pedestrians, bicyclists, and transit riders are all users of the roadway system but may not be fully recognized in the traffic operations analysis and the calculation of LOS.*

Detailed review of the RPEIR reveals that it is a substantial understatement to say that the impacts on pedestrians and bicyclists "may not be fully recognized" in the LOS analysis. In fact, the impacts on those vulnerable transportation system users have been completely ignored in the RPEIR, as well as in the technical report provided in Appendix J.

Aside from references to the General Plan objectives and policies presented above, the only mention of pedestrians and bicyclists in either document is in the description of the existing Fresno transportation system, beginning at RPEIR p. 4.16-8 and Appendix J p. 2-71. Ironically, each of those sections begin with the following statement:

> *Fresno has made a strong commitment to improving non-motorized travel.*

The RPEIR fails to live up to this commitment.

This failure is not inconsequential. The transportation significance criteria employed in the RPEIR are presented beginning at p. 4.16-36. Criterion TRA-1 states that the General Plan would have a significant impact if it would:

> *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway,* ***bicycle and pedestrian facilities****;* [Emphasis added.]

The impact finding for this issue states the following (p. 4.16-41):

> *Continued implementation of the approved General Plan would increase vehicle traffic and would result in 12 roadways segments to exceed General Plan LOS standards, which is in conflict with LOS-related policies in the Mobility and Transportation Element of the approved General Plan.*

Note the lack of any reference to pedestrian- or bicycle-related impacts in this finding.

Very simply, the impacts on pedestrians and bicyclists are not addressed within the RPEIR in terms of either system operational capacity (i.e., will the City be able to accommodate the demand for these non-motorized travel modes?) or, more importantly, safety.

Pedestrian and Bicycle System Operations

As noted above, General Plan Policy MT-1-k calls for development and use of a multi-modal level of service system that addresses travel modes beyond motor vehicles. The RPEIR, however, has failed to include any multi-modal level of service analysis.

The standard reference for analysis of the capacity of transportation facilities and development of level of service values is the *Highway Capacity Manual – A Guide for Multimodal Mobility Analysis* (Transportation Research Board, Sixth Edition, 2016). That document represents an evolution from previous versions of the document, particularly with respect to consideration of multi-modal transportation operations. As described in the Foreword to the document (p. V1-i), it contains:

> *Enhanced methods for analyzing* ***pedestrian, bicycle, and transit facilities, as well as their interactions with motor vehicles****.* [Emphasis not added.]

Despite the availability of this industry-standard document, the RPEIR has completely ignored the operational impacts of the expanded pedestrian and bicycle systems proposed within the General Plan. Consequently, it is unknown whether adequate capacity will be available to serve the needs of pedestrians and bicyclists. Similarly, the nature and extent of "interactions with motor vehicles" will remain a mystery.

Given the expressed intent of the City to provide expanded opportunities for pedestrians and bicyclists, it is imperative that the RPEIR address these issues.

Pedestrian and Bicycle System Safety

Pedestrians and bicyclists are often described as "vulnerable" users of the transportation system. This is because they operate within a system that has traditionally focused on the needs of motor vehicles weighing thousands of pounds, many of which are operated by drivers who are increasingly distracted by cell phones and unnecessarily complicated automotive infotainment systems.

As described below, recent statistics reveal that pedestrians and bicyclists are increasingly in danger. Nonetheless, the RPEIR includes no consideration of potential safety issues for these individuals.

Recent Pedestrian Fatality and Injury Trends

The failure to address pedestrian safety is particularly concerning given recent trends in pedestrian fatalities. Table 1 summarizes pedestrian fatality and injury statistics from the National Highway Traffic Safety Administration (NHTSA) for the years 2009 – 2019.

Table 1
Pedestrian Safety Summary[1]

	Pedestrian Fatalities		Pedestrian Injuries	
Year	Number	Percentage of Total Fatalities	Number	Percentage of Total Injuries
2019[2]	6,205	17%	76,000	3%
2018	6,283	17%	75,000	3%
2017	6,075	16%	71,000	3%
2016	6,080	16%	86,000	3%
2015	5,494	15%	70,000	3%
2014	4,910	15%	65,000	3%
2013	4,779	15%	66,000	3%
2012	4,818	14%	76,000	3%
2011	4,457	14%	69,000	3%
2010	4,302	13%	70,000	3%
2009	4,109	12%	59,000	3%

Notes:
1 Source: NHTSA, *Traffic Safety Facts – 2018 Data – Pedestrians*, March 2020 (except as noted).
2 Source: NHTSA, *Traffic Safety Facts – Research Note – Overview of Motor Vehicle Crashes in 2019*, December 2020.

As shown, the number of pedestrian fatalities in the United States has increased substantially in recent years. Between 2009 and 2019 fatalities increased by 51 percent. Further, preliminary data for the first six months of the year 2020 indicate that the total number of pedestrian deaths will be close to the 2019 figure, even though overall motor vehicle travel was substantially reduced due to the COVID-19 pandemic. The largest number of those early 2020 pedestrian fatalities occurred in California – 485 deaths, which constituted 16.4 percent of the national total. (Reference: Governors Highway Safety Association, *Pedestrian Traffic Fatalities by State – 2020 Preliminary Data*, March 2021.)

The pedestrian injury trend is less consistent, but the number of pedestrian injuries is clearly substantial, with no indication that those numbers will be reduced in the near future.

Recent Bicyclist Fatality and Injury Trends

Table 2 presents similar NHTSA information for "pedalcyclists" (i.e., the NHTSA term for "bicyclists and other cyclists including riders of two-wheel, nonmotorized vehicles, tricycles, and unicycles powered solely by pedals"). This table covers the years 2009 through 2018.

Table 2
Pedalcyclist Safety Summary

	Pedalcyclist Fatalities		Pedalcyclist Injuries	
Year	Number	Percentage of Total Fatalities	Number	Percentage of Total Injuries
2018	857	2.3%	47,000	1.7%
2017	806	2.2%	50,000	1.8%
2016	853	2.3%	64,000	2.1%
2015	829	2.3%	45,000	1.8%
2014	729	2.2%	50,000	2.2%
2013	749	2.3%	48,000	2.1%
2012	734	2.2%	49,000	2.1%
2011	682	2.1%	48,000	2.2%
2010	623	1.9%	52,000	2.3%
2009	628	1.9%	51,000	2.3%

Source: NHTSA, *Traffic Safety Facts – 2018 Data – Bicyclists and Other Cyclists*, July 2020 (Revised).

Although the bicyclist numbers are not as dramatic as for pedestrians, they remain indicative of a need to fully address the potential safety impacts associated with increased bicyclist activity, as proposed in the General Plan. In the ten years from 2009 through 2018, the number of bicyclist fatalities increased by 36 percent. Again, the trend in the number of injuries is less clear, but with numbers ranging from 45,000 to 64,000, the potential risks to bicyclists are obvious.

Relative Risk for Pedestrians and Bicyclists

It is also critical to recognize that, as stated above, pedestrians and bicyclists are vulnerable users of the transportation system, as they are not protected by thousands of pounds of vehicular structure, airbags, and other such safety devices.

According to the Centers for Disease Control and Prevention "Pedestrian Safety" website (https://www.cdc.gov/transportationsafety/pedestrian_safety/index.html#:~:text=Per%20trip%2C%20pedestrians%20are%201.5,killed%20in%20a%20car%20crash.&text=Who%20is%20most%20at%20risk%3F&text=Almost%20half%20(47%25)%20of,driver%20and%2For%20the%20pedestrian), "pedestrians are 1.5 times more likely than passenger vehicle occupants to be killed in a car crash."

In addition, the specific level of risk to which pedestrians and bicyclists are exposed varies depending upon the environment in which they are located, particularly as it relates to the speed of nearby motor vehicles. Table 3 summarizes some of the key conclusions of a study performed for the AAA Foundation for Traffic Safety, which addressed the risk of severe injury or death for pedestrians hit by vehicles traveling at various speeds. The corresponding numbers for bicyclists are likely to be even less favorable, due to the increased level of kinetic energy associated with a moving bicycle, which adds to the severity of the impact.

Table 3
Pedestrian Risk of Severe Injury or Death

Risk	Motor Vehicle Speed	
	Severe Injury	Death
10%	16 MPH	23 MPH
25%	23 MPH	32 MPH
50%	31 MPH	42 MPH
75%	39 MPH	50 MPH
90%	46 MPH	58 MPH

Source: Tefft, B.C., *Impact Speed and a Pedestrian's Risk of Severe Injury or Death*, AAA Foundation for Traffic Safety, September 2011.

As shown, even on local, residential streets and other streets with low operating speeds (e.g., 25 – 35 MPH), there is a significant risk of severe injury or death for pedestrians.

Moreover, in a June 2018 article, the Detroit Free Press published the results of an investigation into the adverse pedestrian safety impacts associated with the growth in sales of sport utility vehicles (SUVs). According to that article:

> *At crashes where a vehicle is traveling 20 mph, 5 percent of pedestrians die. At 30 mph, the percentage increases to 45 percent. At 40 mph, the percentage skyrockets to 85 percent, according to research from 1995 cited by the European Commission, an arm of the European Union.* (Reference: Detroit Free Press, "Death on Foot: America's love of SUVs is killing pedestrians," June 28, 2018 (Updated online December 16, 2019).)

Thus, vulnerable road users such as pedestrians and bicyclists assume a relatively high risk every time they venture onto the transportation system. Because of this, it is critically important that the potential safety impacts associated with continued implementation of the Fresno General Plan be adequately addressed. As currently presented, that is not the case.

Trucks vs. Pedestrians and Bicyclists

The failure to adequately address pedestrian and bicycle impacts is particularly problematic given the level of warehouse development contemplated by the General Plan. Such developments generate substantial volumes of truck traffic, which poses real safety impacts to pedestrians and bicyclists. (References: City of Fresno General Plan, Figure LU-1 – General Plan Land Use and Circulation Map, p. 3-31 and FirstCarbon Solutions, *Master Environmental Impact Report - General Plan and Development Code Update*, July 22, 2014, Table 3-3 – Incremental Development for Buildout of Fresno General Plan and Development Code Update, p. 3-24.)

The Detroit Free Press article cited above specifically addresses pedestrian safety issues associated with SUVs, but its conclusions also apply to the heavy trucks that will serve the anticipated warehouse development. In fact, the heavy trucks traveling to and from the warehouse facilities will have even greater safety impacts than those portrayed in the article. A key factor contributing to the pedestrian safety problems is the "higher-profile, blunt-nosed" front end found on large vehicles.

The article notes that the recent increase in pedestrian fatalities is:

> *. . . primarily an urban plague that kills minorities at a disproportionate rate.*

Further:

> *It is most prominent in cities both in the industrial heartland and warm weather spots on the nation's coasts and Sun Belt.*

With regard to the federal government's response to interactions between pedestrians and large vehicles, the article states:

> *Federal safety regulators have known for years that SUVs, with their higher front-end profile, are at least twice as likely as cars to kill the walkers, joggers and children they hit, yet have done nothing.*

More specifically:

> *The National Highway Traffic Safety Administration made the connection in 2015 that SUVs were deadlier for pedestrians than cars . . . citing 12 independent studies of injury data, [which] said pedestrians are two to three times 'more likely to suffer a fatality when struck by an SUV or pickup than when struck by a passenger car.'*

As noted earlier, all of the above statements regarding the safety issues associated with SUVs also apply to the large trucks that will occur as a result of the warehouse development as envisioned in the General Plan. In fact, given their even higher profile and their much greater weight, the problem is somewhat magnified for such vehicles.

The lack of federal action suggests that it is up to local governments to take the lead in adopting measures aimed at ensuring the safety of pedestrians and bicyclists. Although the City's General Plan and the RPEIR represent clear opportunities to thoroughly address this matter, they have failed to do so.

CONCLUSION

Our review of the Recirculated Program Environmental Impact Report completed in connection with the City of Fresno General Plan revealed several deficiencies in the transportation analysis, particularly with respect to consideration of impacts related to pedestrians and bicyclists. Of particular concern is the total failure to provide even a minimal analysis of the operational impacts associated with these non-motorized travel modes. Even more important is the lack of any consideration with respect to the safety impacts to which pedestrians and bicyclists would be exposed under the proposed General Plan including the additional truck traffic that will occur as a result of increased warehouse development. These deficiencies must be addressed prior to approval by the City of Fresno of the General Plan and its environmental documentation.

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact me at (906) 847-8276.

Sincerely,

GRIFFIN COVE TRANSPORTATION CONSULTING, PLLC



Neal K. Liddicoat, P.E.
Principal

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November 20, 2020

Mr. Leland Parnagian
G4 Enterprises LTD
8570 S. Cedar
Fresno, CA 93725

SUBJECT: NORTHPOINT BUILDING 31 TRIP GENERATION AND IMPACT ASSESSMENT

Dear Mr. Leland Parnagian:

Urban Crossroads, Inc. is pleased to provide the following Trip Generation and Impact Assessment for the Northpoint Building 31 Project ("Project") which is located in within the entitled TPM-2012-06 in the City of Fresno. The purpose of this work effort is to assess the potential changes in trip generation from the currently entitled Project ("Existing Project") to the proposed modified Project ("Modified Project"). It is our understanding that the Modified Project, as the Existing Project is to consist of approximately 469,596 square feet (sf). The currently entitled land uses are illustrated on Exhibit 1 and the proposed Project land uses are illustrated on Exhibit 2. As discussed below, the Modified Project's impacts are less than the impacts of the Existing Project, and thus, aside from this Trip Generation and Impact Assessment, no additional CEQA analysis is required.

The minor changes from the Existing Project to the Modified Project are summarized as follows:

TABLE 1: EXISTING PROJECT COMPARED TO MODIFIED PROJECT

Existing Project:	Modified Project
Auto Parking: 651	Auto Parking: 297
Trailer Parking: 66	Trailer Parking: 54
Dock Doors: 84	Dock Doors: 113
Dock Level Doors: 8	Dock Level Doors: 2

ENTITLED LAND USE AND EXISTING PROJECT

On March 20, 2015, the City of Fresno adopted a Mitigated Negative Declaration (MND) for TPM-2012-06 which includes approximately 122.01 acres of property generally located at the northwest corner of the intersection of East Central and South Orange Avenues in the City of Fresno. The entire TPM-2012-06 includes future development of a proposed industrial park yielding up to 2,125,728 sf of building floor area. More specifically, the Existing Project and Modified Project both consist of 469,596 sf of the total 2,125,728 sf adopted pursuant to TPM-2012-06. On January 17, 2018 the City of Fresno issued a Development Permit for the Existing Project.

EXHIBIT 1: CURRENTLY ENTITLED LAND USE/EXISTING PROJECT

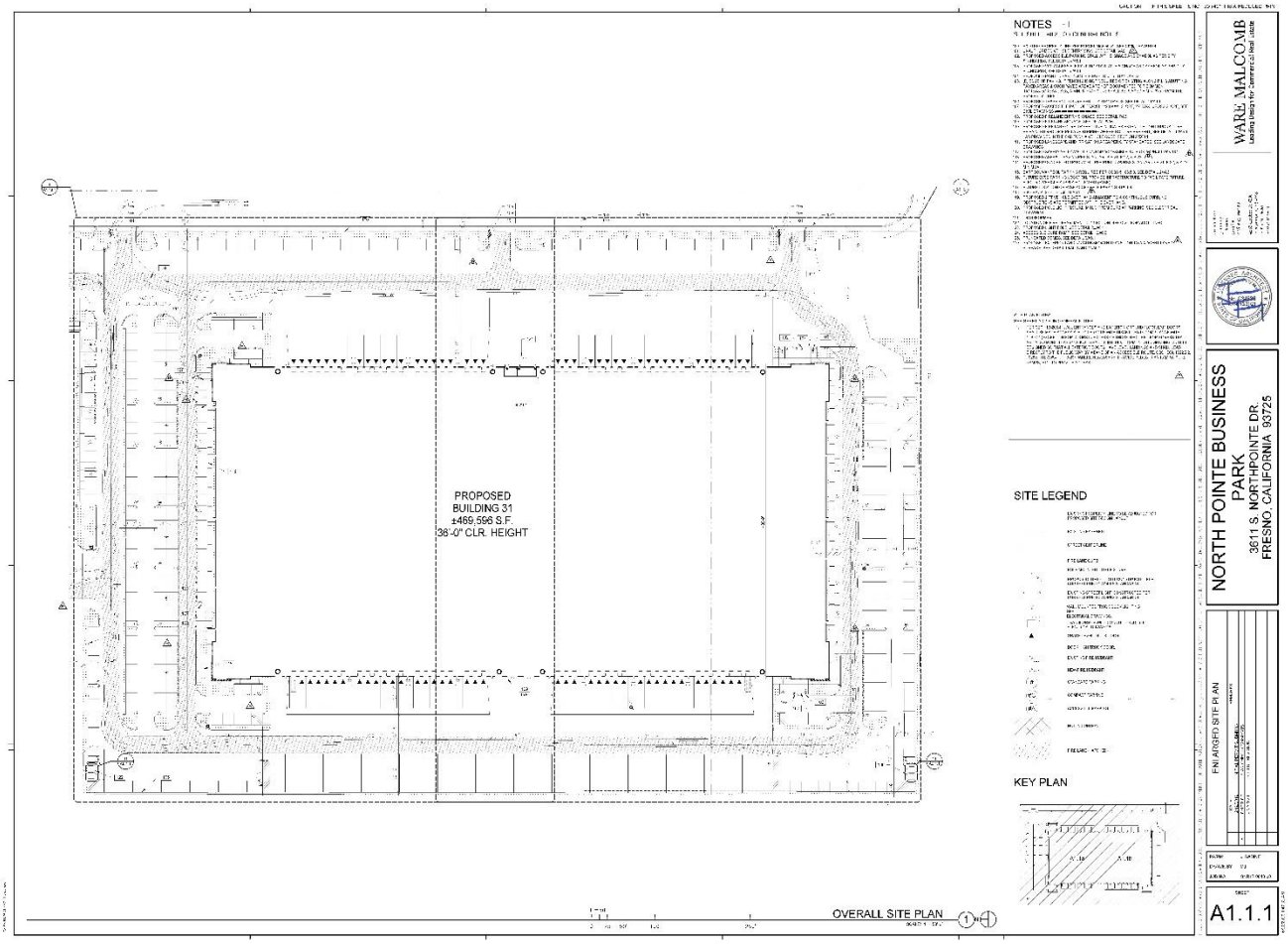


EXHIBIT 2: PROPOSED PROJECT LAND USES/MODIFIED PROJECT

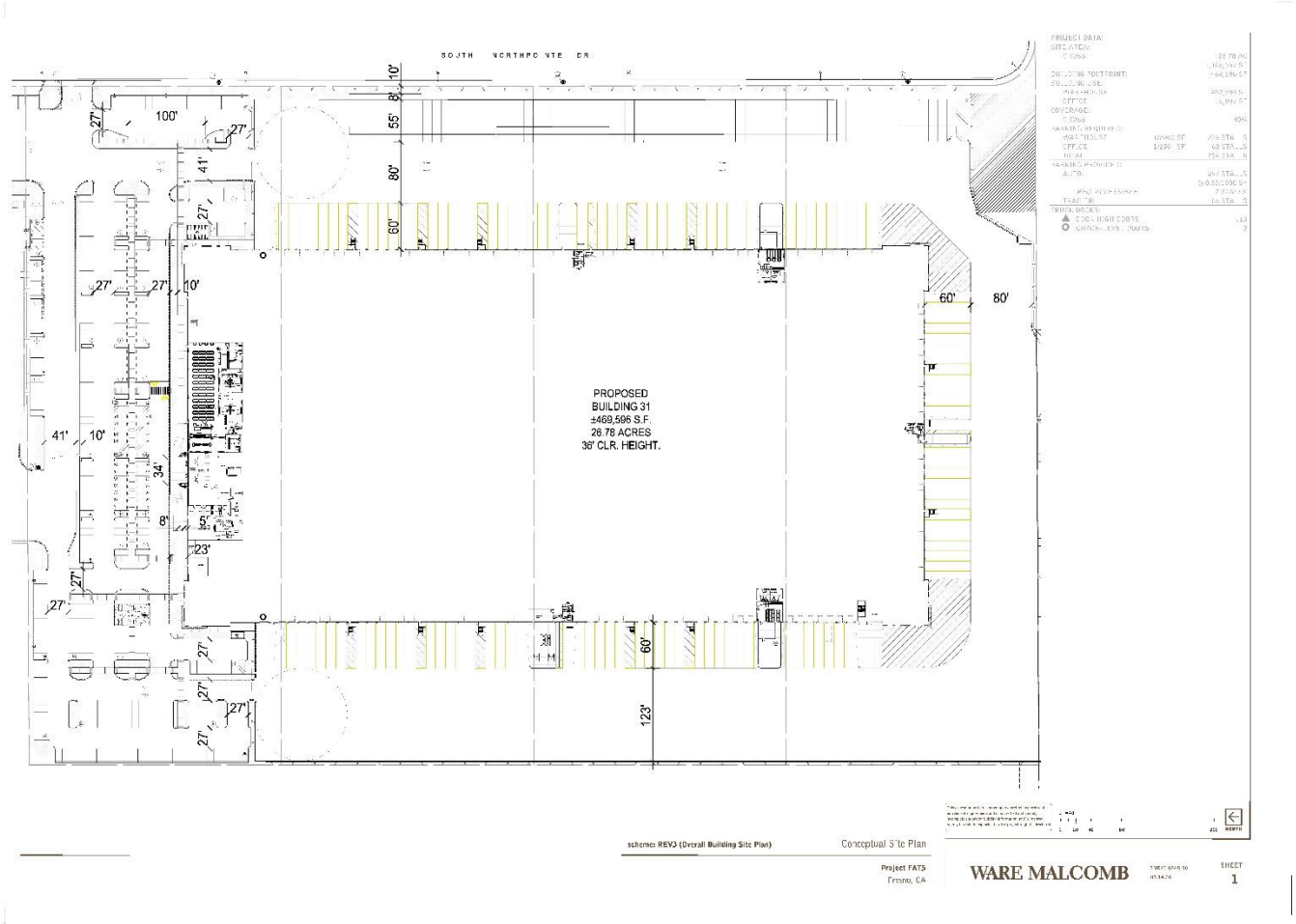


Table 2 presents the trip generation rates from the adopted MND for the existing industrial park land use.

As shown in Table 3, the Existing Project, 496,596 sf of currently entitled industrial park, would generate 3,274 vehicle trips per day, with 431 vehicle trips generated during the AM peak hour and 659 vehicle trips generated during the PM peak hour.

TABLE 2: CURRENTLY ENTITLED LAND USE/EXISTING PROJECT TRIP GENERATION RATES

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Industrial Park[3]	TSF	130	0.810	0.110	0.920	0.854	0.548	1.402	6.970
Passenger Cars (87.0%)			0.705	0.096	0.800	0.743	0.477	1.220	6.064
2-Axle Trucks (2.17%)			0.018	0.002	0.020	0.019	0.012	0.030	0.151
3-Axle Trucks (2.69%)			0.022	0.003	0.025	0.023	0.013	0.038	0.187
4+-Axle Trucks (8.14%)			0.066	0.009	0.075	0.070	0.045	0.114	0.567

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

[2] TSF = thousand square feet

[3] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition Supplement (February 2020).

TABLE 3: CURRENTLY ENTITLED LAND USE/EXISTING PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity	Units[1]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Industrial Park	469.596	TSF							
Passenger Cars:			331	45	376	349	224	573	2,848
Truck Trips:									
2-axle:			8	1	9	9	6	15	72
3-axle:			10	1	11	11	6	17	88
4+-axle:			31	4	35	33	21	54	266
- Truck Trips			49	6	55	53	33	86	426
TOTAL TRIPS [2]			**380**	**51**	**431**	**402**	**257**	**659**	**3,274**

[1] TSF = thousand square feet

[2] TOTAL TRIPS = Passenger Cars + Truck Trips.

MODIFIED PROJECT

The Modified Project is to consist of up to 469,596 sf of high-cube fulfillment center (sort) warehouse space.

Table 4 presents the trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) for the high-cube fulfillment center (sort). As shown in Table 5, the Modified Project, 469,596 sf of proposed high-cube fulfillment center (sort) space, would generate 3,028 vehicle trips per day, with 407 vehicle trips generated during the AM peak hour and 563 vehicle trips generated during the PM peak hour.

PROJECT TRIP GENERATION COMPARISON AND RELATED IMPACTS COMPARISON

As shown in Table 6, the development of the Modified Project is anticipated to generate 246 fewer vehicle trip-ends per day with 24 fewer AM and 96 fewer PM peak hour vehicle trips as compared to the Existing Project. The development of the Modified Project is also anticipated to generate 332 fewer truck trip-ends per day with 48 fewer AM and 75 fewer PM peak hour truck trips as compared to the Existing Project. Also, because the Modified Project will generate less trips than the Existing Project, the Modified Project will have less air quality and greenhouse gas impacts.

It should also be noted that even if the Project site were developed consistent with the industrial park land use designation, it would result in fewer vehicle trips than what was previously entitled since the ITE trip generation rates for the industrial park use have been updated based on more current survey data resulting in a reduction in vehicle trips and consequently fewer air quality and greenhouse gas impacts.

TABLE 4: MODIFIED PROJECT LAND USE TRIP GENERATION RATES

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Fulfillment Center (Sort)[3,4]	TSF	155	0.705	0.165	0.870	0.468	0.732	1.200	6.440
Passenger Cars (AM-98.0%; PM-98.0%; Daily-97.0%)			0.691	0.162	0.853	0.459	0.717	1.176	6.247
2-Axle Trucks (AM-0.33%; PM-0.33%; Daily-0.50%)			0.002	0.001	0.003	0.002	0.002	0.004	0.032
3-Axle Trucks (AM-0.41%; PM-0.41%; Daily-0.62%)			0.003	0.001	0.004	0.002	0.003	0.005	0.040
4-Axle+ Trucks (AM-1.25%; PM-1.25%; Daily-1.88%)			0.009	0.002	0.011	0.006	0.009	0.015	0.121

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

[2] TSF = thousand square feet

[3] Vehicle Mix Source: ITE Trip Generation Handbook Supplement (2020), Appendix C.

Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.

Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks.

Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.

Inbound and outbound split source: ITE Trip Generation Manual, Tenth Edition (2017) for ITE Land Use Code 154.

[4] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition Supplement (February 2020).

TABLE 5: MODIFIED PROJECT LAND USE TRIP GENERATION SUMMARY

Land Use	Quantity	Units[1]	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Fulfillment (Sort)	469.596	TSF							
Passenger Cars:			324	76	400	215	337	552	2,934
Truck Trips:									
2-axle:			1	0	1	1	1	2	16
3-axle:			1	0	2	1	1	2	20
4+-axle:			4	1	5	3	4	7	58
- Truck Trips			6	1	7	5	6	11	94
TOTAL TRIPS [2]			**330**	**77**	**407**	**220**	**343**	**563**	**3,028**

[1] TSF = thousand square feet

[2] TOTAL TRIPS = Passenger Cars + Truck Trips.

TABLE 6: TRIP GENERATION COMPARISON

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Existing Project - Industrial Park	380	51	431	402	257	659	3,274
Modified Project - High-Cube Fulfillment Center (Sort)	330	77	407	220	343	563	3,028
Variance	***-50***	***26***	***-24***	***-182***	***86***	***-96***	***-246***

CONCLUSION

As the Modified Project is anticipated to result in a net reduction to the AM, PM, and daily trips (including fewer trucks) in comparison to that evaluated for the Existing Project, no additional traffic-related, air quality, and greenhouse gas impacts are anticipated as a result of the proposed development currently being contemplated. If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

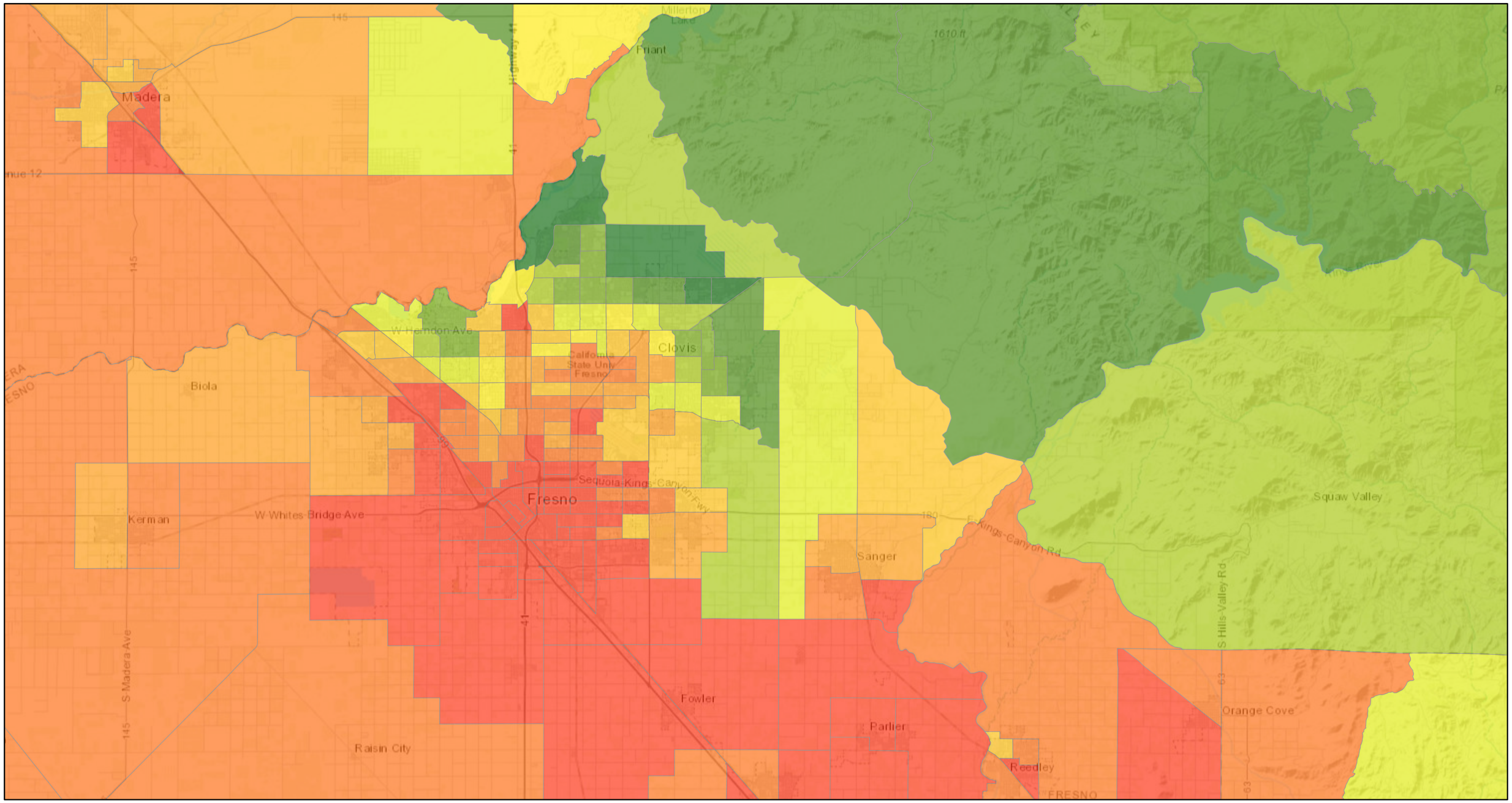
Respectfully submitted,

URBAN CROSSROADS, INC.



Haseeb Qureshi
Associate Principal

Fresno CalEnviroScreen 3.0 Results (June 2018 Update)



5/10/2021, 1:51:11 PM

CalEnviroScreen 3.0 Results (June 2018 Update)

- 1 - 10% (Lowest Scores)
- 11 - 20%
- 21 - 30%
- 31 - 40%
- 41 - 50%
- 51 - 60%
- 61 - 70%
- 71 - 80%
- 81 - 90%
- 91 - 100% (Highest Scores)

1:288,895

0 2.75 5.5 11 mi

0 4.5 9 18 km

Fresno County Dept. PWP, Bureau of Land Management, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

Web AppBuilder for ArcGIS
Fresno County Dept. PWP, Bureau of Land Management, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | OEHHA |

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CalEnviroScreen 3.0, June 2018 update:

For more information, see the report and access additional data at:
CalEnviroScreen 3.0 Webpage
A web map of the CalEnviroScreen 3.0 results is available at:
CalEnviroScreen 3.0 Web Map

Variable Name	Description	CalEnviroScreen Category
Census Tract	Census Tract ID from 2010 Census	
Total Population	2010 population in census tracts	
California County	California county that the census tract falls within	
ZIP	Postal ZIP Code that the census tract falls within	
Nearby City (to help approximate location only)	City or nearby city the census tract falls within	
Longitude	Longitude of the centroid of the census tract	
Latitude	Latitude of the centroid of the census tract	
CES 3.0 Score	CalEnviroScreen Score, Pollution Score multiplied by Population Characteristics Score	
CES 3.0 Percentile	Percentile of the CalEnviroScreen score	
CES 3.0 Percentile Range	Percentile of the CalEnviroScreen score, grouped by 5% increments	
SB 535 Disadvantaged Community	Disadvantaged communities list from: https://oehha.ca.gov/calenviroscreen/sb535 http://www.calepa.ca.gov/EnvJustice/GHGInvest/	
Ozone	Amount of daily maximum 8 hour Ozone concentration	Pollution Burden (Exposures Indicator)
Ozone Pctl	Ozone percentile	Pollution Burden (Exposures Indicator)
PM2.5	Annual mean PM 2.5 concentrations	Pollution Burden (Exposures Indicator)
PM2.5 Pctl	PM2.5 percentile	Pollution Burden (Exposures Indicator)
Diesel PM	Diesel PM emissions from on-road and non-road sources	Pollution Burden (Exposures Indicator)
Diesel PM Pctl	Diesel PM percentile	Pollution Burden (Exposures Indicator)
Drinking Water	Drinking water contaminant index for selected contaminants	Pollution Burden (Exposures Indicator)
Drinking Water Pctl	Drinking water percentile	Pollution Burden (Exposures Indicator)
Pesticides	Total pounds of selected active pesticide ingredients (filtered for hazard and volatility) used in production-agriculture per square mile in the census tract	Pollution Burden (Exposures Indicator)
Pesticides Pctl	Pesticides percentile	Pollution Burden (Exposures Indicator)
Tox. Release	Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration (from RSEI)	Pollution Burden (Exposures Indicator)
Tox. Release Pctl	Toxic release percentile	Pollution Burden (Exposures Indicator)
Traffic	Traffic density, in vehicle-kilometers per hour per road length, within 150 meters of the census tract boundary	Pollution Burden (Exposures Indicator)
Traffic Pctl	Traffic percentile	Pollution Burden (Exposures Indicator)
Cleanup Sites	Cleanup sites, sum of weighted EnviroStor cleanup sites within buffered distances to populated blocks of census tracts	Pollution Burden (Environmental Effects Indicator)
Cleanup Sites Pctl	Cleanup sites percentile	Pollution Burden (Environmental Effects Indicator)
Groundwater Threats	Groundwater threats, sum of weighted GeoTracker leaking underground storage tank sites within buffered distances to populated blocks of census tracts	Pollution Burden (Environmental Effects Indicator)
Groundwater Threats Pctl	Groundwater threats percentile	Pollution Burden (Environmental Effects Indicator)
Haz. Waste	Sum of weighted hazardous waste facilities and large quantity generators within buffered distances to populated blocks of census tracts	Pollution Burden (Environmental Effects Indicator)
Haz. Waste Pctl	Hazardous waste percentile	Pollution Burden (Environmental Effects Indicator)
Imp. Water Bodies	Impaired water bodies, sum of number of pollutants across all impaired water bodies within buffered distances to populated blocks of census tracts	Pollution Burden (Environmental Effects Indicator)
Imp. Water Bodies Pctl	Impaired water bodies percentile	Pollution Burden (Environmental Effects Indicator)
Solid Waste	Sum of weighted solid waste sites and facilities (SWIS) within buffered distances to populated blocks of census tracts	Pollution Burden (Environmental Effects Indicator)
Solid Waste Pctl	Solid waste percentile	Pollution Burden (Environmental Effects Indicator)
Pollution Burden	Average of percentiles from the Pollution Burden indicators (with a half weighting for the Environmental Effects indicators)	
Pollution Burden Score	Pollution Burden variable scaled with a range of 0-10. (Used to calculate CES 3.0 Score)	
Pollution Burden Pctl	Pollution burden percentile	
Asthma	Age-adjusted rate of emergency department visits for asthma	Population Characteristics (Sensitive Populations)
Asthma Pctl	Asthma percentile	Population Characteristics (Sensitive Populations)
Low Birth Weight	Percent low birth weight	Population Characteristics (Sensitive Populations)

Low Birth Weight Pctl	Low birth weight percentile	Population Characteristics (Sensitive Populations)
Cardiovascular Disease	Age-adjusted rate of emergency department visits for heart attacks per 10,000	Population Characteristics (Sensitive Populations)
Cardiovascular Disease Pctl	Cardiovascular disease percentile	Population Characteristics (Sensitive Populations)
Education	Percent of population over 25 with less than a high school education	Population Characteristics (Socioeconomic Factors)
Education Pctl	Education percentile	Population Characteristics (Socioeconomic Factors)
Linguistic Isolation	Percent limited English speaking households	Population Characteristics (Socioeconomic Factors)
Linguistic Isolation Pctl	Linguistic isolation percentile	Population Characteristics (Socioeconomic Factors)
Poverty	Percent of population living below two times the federal poverty level	Population Characteristics (Socioeconomic Factors)
Poverty	Poverty percentile	Population Characteristics (Socioeconomic Factors)
Unemployment	Percent of the population over the age of 16 that is unemployed and eligible for the labor force	Population Characteristics (Socioeconomic Factors)
Unemployment Pctl	Unemployment percentile	Population Characteristics (Socioeconomic Factors)
Housing Burden	Percent housing burdened low income households	Population Characteristics (Socioeconomic Factors)
Housing Burden Pctl	Housing burden percentile	Population Characteristics (Socioeconomic Factors)
Pop. Char.	Average of percentiles from the Population Characteristics indicators	
Pop. Char. Score	Population Characteristics variable scaled with a range of 0-10. (Used to calculate CES 3.0 Score)	
Pop. Char. Score Pctl	Population characteristics percentile	

CalEnviroScreen 3.0: Description of Zeros and Missing Values

8035 California Census Tracts are used in the CalEnviroScreen analysis

Indicator	Ozone	PM 2.5	Diesel PM	Pesticides Use	Toxic Releases	Traffic	Drinking Water	Cleanup sites	Ground-water threats	Hazardous Waste	Impaired Water Bodies	Solid Waste
# of Zeros	0	0	0	5147	17	0	0	2553	1993	2640	3512	3794
# of NAs	0	19	0	0	0	56	18	0	0	0	0	0

Indicator	Asthma	LBW	CVD	Education	Linguistic isolation	Poverty	Unemployment	Housing Burden
# of Zeros	14	10	14	13	292	1	1	0
# of NAs	0	222	0	96	242	79	155	157

What do indicator raw values of zero and NA mean?

NA or missing raw values:
When an indicator has a missing value ("NA"), it typically means no monitoring or reporting was conducted or no population was reported within that census tract. For example, ambient air quality measures are not available for all California census tracts because many places do not have an air monitor close enough to reliably estimate air quality in that community.
There are 11 out of 8035 census tracts that have zero population reported by the U.S. Census. These were assigned "NA" for all population characteristic indicators. In addition, census tracts with highly unreliable estimates for the educational attainment, linguistic isolation, poverty, and rent-adjusted income indicators were assigned "NA." These variables are derived from the household data rather than individual level data (see the report for more detail).
Zero raw values:
A value of zero, typically implies that monitoring or reporting was conducted, but no impacts were present. For many exposure and environmental effects indicators, this means that no facilities or sites were located within 1000 meters of a populated area of the census tract. For example, 2553 census tracts did not have a Cleanup site within 1000 meters of a populated area of the census tract. These census tracts were given a value zero. Similarly, a zero for a Population Characteristics indicator such as poverty, for example, means people live there but there are no residents under the poverty level.

What do percentiles of zero and NA mean?

NA or missing percentiles values:
Indicators that include missing values ("NA") are PM 2.5, Traffic, Drinking Water, Low Birth Weight and all socioeconomic factor indicators. In these cases, missing values were assigned no percentile (given an "NA") and did not contribute to their overall CalEnviroScreen score. For example, if a census tract was missing both and PM2.5 and Traffic the denominator of the exposure indicators was adjusted to five instead of seven indicators.
Zero percentile values:
Many census tracts for exposure and environmental effects indicators have a raw value of zero. We do not include these census tracts in the percentile calculation, which would give the false impression that an impact is present. For example, around 64% of census tracts have none of the select pesticides used. If these were used in the percentile calculation, a value of zero would correspond to the 63rd percentile. It is more appropriate to assign these places a percentile value of "0" corresponding to no impact. This means that for the pesticide indicator, 2888 (8035 minus 5147) census tracts make up the percentile range. Indicators with missing values ("NAs") are never included in the percentile calculation. The Education indicator has 7926 census tracts in the percentile calculation (8035 minus 13 (zeros values) minus 96 (missing values) = 7926).

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Census Tract	CES 3.0 Score	CES 3.0 Percentile	CES 3.0 Percentile Range	Total Population	California County	Age group from 2010 Census (%)			Race or ethnicity from 2010 Census (%)					
						Children < 10 (%)	Pop 11-64 years (%)	Elderly > 65 (%)	Hispanic (%)	White (%)	African American (%)	Native American (%)	Asian American (%)	Other (%)
6019001100	94.09	100.00	95-100% (highest scores)	3174	Fresno	18.8	73.6	7.6	65.3	4.2	24.6	0.5	3.5	1.8
6071001600	90.68	99.99	95-100% (highest scores)	6133	San Bernardino	19.7	76.1	4.2	91.1	5.8	0.7	0.3	1.4	0.7
6019000200	85.97	99.97	95-100% (highest scores)	3167	Fresno	21.5	72.5	6	63.6	5.3	18.9	0.6	9.8	1.8
6077000801	82.49	99.96	95-100% (highest scores)	6692	San Joaquin	18.7	74.5	6.8	57.4	6	12.5	0.3	20.9	2.8
6019001500	82.03	99.95	95-100% (highest scores)	2206	Fresno	14.8	72.1	13.1	71.8	21.4	1.2	0.5	4.5	0.6
6037204920	80.73	99.94	95-100% (highest scores)	2598	Los Angeles	15.3	74.5	10.2	98.1	1.2	0.1	0.1	0.2	0.3
6077000300	80.18	99.92	95-100% (highest scores)	2396	San Joaquin	16.7	69.8	13.5	51.8	16.4	16.4	1.3	9.9	4.1
6019001000	80.13	99.91	95-100% (highest scores)	4106	Fresno	21	71.3	7.7	52.7	2.7	28.7	0.4	14.3	1.2
6037206050	79.03	99.90	95-100% (highest scores)	2146	Los Angeles	12.4	63.2	24.4	79.3	8.9	4.1	0.1	7.2	0.5
6019000400	78.53	99.89	95-100% (highest scores)	6343	Fresno	18.3	75.8	5.9	78	9.1	5.8	0.8	5.3	0.9
6099002100	78.52	99.87	95-100% (highest scores)	4165	Stanislaus	19.3	75.3	5.4	66.5	25.6	2.4	0.9	2.2	2.5
6029002500	78.41	99.86	95-100% (highest scores)	9122	Kern	23.3	70.8	5.9	76.7	5.1	15.9	0.7	0.4	1.2
6019000600	78.41	99.85	95-100% (highest scores)	6161	Fresno	21.4	71	7.6	70.8	15.2	6.8	0.7	4.4	2.2
6019001201	78.05	99.84	95-100% (highest scores)	5936	Fresno	20.7	73.1	6.2	83.1	5.1	3.7	0.7	6.6	0.8
6037205120	78.04	99.82	95-100% (highest scores)	3618	Los Angeles	17.8	75	7.2	96.5	0.8	1	0.1	1.1	0.4
6019000902	77.65	99.81	95-100% (highest scores)	5252	Fresno	23.6	70.2	6.2	57.9	1.5	21.3	0.3	17.7	1.3
6037291220	77.50	99.80	95-100% (highest scores)	3353	Los Angeles	14.8	74.7	10.5	65.1	4.5	11.5	0.1	17	1.7
6019001202	77.41	99.79	95-100% (highest scores)	4756	Fresno	22.5	71.4	6.1	72.5	2.5	11.7	0.4	12.3	0.6
6019000800	77.40	99.77	95-100% (highest scores)	964	Fresno	24.5	69.7	5.8	66.9	4	6.2	0.6	20.9	1.3
6019000300	76.71	99.76	95-100% (highest scores)	3609	Fresno	18.5	70.1	11.4	62.8	3.4	25.7	0.9	5.8	1.4
6037239202	76.04	99.75	95-100% (highest scores)	4724	Los Angeles	19.7	75.5	4.8	82.6	0.7	16.1	0	0	0.6
6037226002	76.04	99.74	95-100% (highest scores)	1604	Los Angeles	6.5	86.6	6.9	49.8	22.7	18.3	0.4	6.7	2.2
6077000700	76.02	99.72	95-100% (highest scores)	5269	San Joaquin	18.5	72.8	8.7	74.4	4	4.8	0.3	14.3	2.2
6019000901	75.86	99.71	95-100% (highest scores)	3151	Fresno	25.5	68.7	5.8	54.4	3.6	21.9	0.1	18.5	1.5
6077000100	75.54	99.70	95-100% (highest scores)	3863	San Joaquin	13	75	12	51.9	17	15.2	1	11.9	3.1
6099002302	75.19	99.68	95-100% (highest scores)	4010	Stanislaus	19.2	73.9	6.9	76.1	18.4	1.5	0.6	2.3	1.1
6071004900	74.95	99.67	95-100% (highest scores)	7590	San Bernardino	20.4	74.1	5.5	86.6	6.6	4.6	0.3	0.8	1
6037535400	74.46	99.66	95-100% (highest scores)	3495	Los Angeles	19	76.4	4.6	86.4	1.1	11.9	0	0.1	0.5
6019000700	74.16	99.65	95-100% (highest scores)	3921	Fresno	17	72.7	10.3	61.7	4.2	29	0.5	2.8	1.8
6065030300	74.06	99.63	95-100% (highest scores)	4497	Riverside	9.9	81	9.1	41.4	36.8	16	0.8	2.1	2.9
6019007100	73.78	99.62	95-100% (highest scores)	7904	Fresno	18.8	73.2	8	87.8	7.3	1.1	0.4	2.6	0.8
6037243100	73.54	99.61	95-100% (highest scores)	5350	Los Angeles	22.4	72.1	5.5	64.7	1.8	31.8	0.2	0.4	1
6037543305	73.54	99.60	95-100% (highest scores)	2666	Los Angeles	9.5	72.7	17.8	27.2	26.9	37.3	0.6	5.2	2.9
6071005701	73.28	99.58	95-100% (highest scores)	2216	San Bernardino	14.2	61.3	24.5	59.3	19.2	11.9	1	6.7	1.9
6037204600	73.13	99.57	95-100% (highest scores)	4101	Los Angeles	16.8	74	9.2	96.3	1.8	0.4	0.2	1.1	0.2
6037227010	72.68	99.56	95-100% (highest scores)	4662	Los Angeles	19.2	76.3	4.5	92.1	0.6	7.1	0.1	0	0.2
6099002301	72.39	99.55	95-100% (highest scores)	7841	Stanislaus	20.6	74.8	4.6	74.4	15.6	2.4	0.7	5	2
6019000100	71.95	99.53	95-100% (highest scores)	2860	Fresno	0.3	92.9	6.8	55.7	21.7	16.4	0.8	4.6	0.7
6077001900	71.89	99.52	95-100% (highest scores)	5592	San Joaquin	18.5	72.4	9.1	74.1	7.7	10.9	0.5	4.5	2.4
6037206032	71.56	99.51	95-100% (highest scores)	5275	Los Angeles	15.4	71.6	13	80.3	2	1.2	0.2	15.5	0.7
6037226001	71.53	99.50	95-100% (highest scores)	2068	Los Angeles	17.1	76.5	6.4	89.1	1.7	6.1	0.2	2.6	0.2
6037239501	71.36	99.48	95-100% (highest scores)	3454	Los Angeles	19.3	74.1	6.6	74.8	0.7	24	0	0.1	0.3
6019002000	71.34	99.47	95-100% (highest scores)	6369	Fresno	18.4	73.2	8.4	58.3	22.5	8.1	0.9	7.9	2.4
6077005119	71.30	99.46	95-100% (highest scores)	6006	San Joaquin	19.3	75	5.7	29.8	22.5	10.1	0.3	33.1	4.3
6037203100	71.05	99.45	95-100% (highest scores)	4839	Los Angeles	20.1	74	5.9	95.8	1	1.1	0.3	1.5	0.3
6037530700	71.03	99.43	95-100% (highest scores)	2213	Los Angeles	16.5	76	7.5	95.2	2.1	0.8	0.2	1.5	0.2
6073005000	70.91	99.42	95-100% (highest scores)	2227	San Diego	17.3	76.2	6.5	90.3	5.4	1.8	0.2	1.4	0.9
6037301601	70.91	99.41	95-100% (highest scores)	6198	Los Angeles	8.7	75.8	15.5	18.9	66.8	1.2	0.1	8.3	4.7
6037185320	70.89	99.39	95-100% (highest scores)	3081	Los Angeles	13.6	76	10.4	90	3.7	0.6	0.2	5	0.6
6037543202	70.82	99.38	95-100% (highest scores)	4867	Los Angeles	19.4	75.1	5.5	73.6	0.9	23.5	0	1.1	0.8
6065030502	70.63	99.37	95-100% (highest scores)	2220	Riverside	18.2	76.2	5.6	87.2	7.6	3.7	0.3	0.5	0.7
6071012500	70.61	99.36	95-100% (highest scores)	4268	San Bernardino	19.2	72.6	8.2	87.7	6.7	3.3	0.4	0.8	1.1
6037531302	70.59	99.34	95-100% (highest scores)	6709	Los Angeles	19.9	73.9	6.2	98.1	1.1	0.2	0.1	0.1	0.4
6019001301	70.56	99.33	95-100% (highest scores)	5653	Fresno	18.6	74.2	7.2	84.9	5.9	2.5	0.6	5.2	0.8
6019002502	70.56	99.32	95-100% (highest scores)	5431	Fresno	24.3	71	4.7	66.6	5.2	3.6	0.5	22.4	1.8
6037402801	70.39	99.31	95-100% (highest scores)	5170	Los Angeles	21.5	75.1	3.4	92.5	2.9	1.8	0.1	2	0.6
6019001304	70.21	99.29	95-100% (highest scores)	5796	Fresno	21.3	71.8	6.9	60.2	3.5	9	0.8	25.2	1.4
6077002201	70.16	99.28	95-100% (highest scores)	2771	San Joaquin	19.5	71.8	8.7	67.1	2.9	24.5	0.3	2.8	2.4
6037532304	69.97	99.27	95-100% (highest scores)	3987	Los Angeles	14.6	76.5	8.9	87.8	5.9	3.6	0.7	1.3	0.6
6019001303	69.96	99.26	95-100% (highest scores)	2888	Fresno	20.9	74.6	4.5	64.4	3.9	4.3	1.2	25.7	0.6
6029002200	69.89	99.24	95-100% (highest scores)	6537	Kern	23.8	71.4	4.8	75.8	3.3	19.2	0.3	0.3	1
6037205110	69.85	99.23	95-100% (highest scores)	3766	Los Angeles	20.4	76.2	3.4	98.5	1.1	0.1	0.1	0.1	0.2
6037570502	69.77	99.22	95-100% (highest scores)	6616	Los Angeles	17	76.9	6.1	54.8	11	13.9	0.3	17.7	2.3
6037291210	69.62	99.21	95-100% (highest scores)	4967	Los Angeles	14.7	75	10.3	62.6	5.6	13.5	0.1	16.5	1.6
6037219901	69.47	99.19	95-100% (highest scores)	5234	Los Angeles	17.9	77.3	4.8	79.8	2.2	16	0.1	0.6	1.2
6037534202	69.37	99.18	95-100% (highest scores)	5790	Los Angeles	19.2	77.3	3.5	95.6	3	0.7	0.1	0.3	0.2
6037540400	69.24	99.17	95-100% (highest scores)	2384	Los Angeles	20.3	75.8	3.9	80.8	0.9	16.4	0.3	0.9	0.8
6065046700	69.15	99.16	95-100% (highest scores)	4442	Riverside	18.3	64.8	16.9	55.6	24	14.6	0.2	3.2	2.4
6029002301	69.08	99.14	95-100% (highest scores)	9743	Kern	19.6	73.1	7.3	85	9.4	3.4	0.5	0.9	0.9
6071002501	68.99	99.13	95-100% (highest scores)	5840	San Bernardino	16.8	77.4	5.8	88.5	7.6	1.8	0.1	1.4	0.7
6019008502	68.98	99.12	95-100% (highest scores)	7929	Fresno	21.3	74.1	4.6	97.5	1.5	0.1	0.1	0.5	0.2
6019000502	68.97	99.10	95-100% (highest scores)	3606	Fresno	20.5	70.8	8.7	71.5	13.9	5.9	0.5	6.9	1.3
6037242100	68.88	99.09	95-100% (highest scores)	2714	Los Angeles	24.5	72.1	3.4	66.6	0.4	31.4	0.1	0.4	1
6037203500	68.82	99.08	95-100% (highest scores)	3064	Los Angeles	16.2	74.5	9.3	85.1	2.4	0.8	0.2	10.7	0.9
6037302401	68.65	99.07	95-100% (highest scores)	5944	Los Angeles	9.8	75.5	14.7	37.3	41.2	1.9	0.1	17	2.5
6067005301	68.64	99.05	95-100% (highest scores)	1823	Sacramento	10.6	85.5	3.9	20.1	33.1	35.1	2.1	4.1	5.5
6037204820	68.47	99.04	95-100% (highest scores)	2274	Los Angeles	16.8	71.6	11.6	97.9	0.8	0	0.3	0.9	0.1
6037532302	68.30	99.03	95-100% (highest scores)	4707	Los Angeles	16.2	74.1	9.7	95.8	2.5	0.7	0.3	0.5	0.3
6073004900	68.27	99.02	95-100% (highest scores)	5028	San Diego	17.3	75.1	7.6	90.4	3.4	4.7	0.1	0.7	0.7
6037229420	68.25	99.00	95-100% (highest scores)	4729	Los Angeles	19.7	76.6	3.7	87.4	0.3	11.4	0.1	0.1	0.6
6037541001	68.24	98.99	95-100% (highest scores)	1164	Los Angeles	12.6	72.5	14.9	43.8	2.7	47.8	0.1	3.5	2.1
6099002200	68.22	98.98	95-100% (highest scores)	6223	Stanislaus	19.7	73.5	6.8	67.5	18.3	4.2	0.7	7.5	1.9
6037534302	67.96	98.97	95-100% (highest scores)	3673	Los Angeles	18.8	77.6	3.6	96.6	1.5	1.3	0.1	0.4	0.1
6073003902	67.79	98.95	95-100% (highest scores)	4927	San Diego	18.8	75.8	5.4	88.7	2.9	6.3	0.2	1.1	0.6
6037239701	67.77	98.94	95-100% (highest scores)	4261	Los Angeles	20.6	74.1	5.3	76.8	0.7	21.5	0.1	0.3	0.7
6077002300	67.75	98.93	95-100% (highest scores)	5020	San Joaquin	19.6	71.3	9.1	78.7	3.3	6.9	0.3	9.1	1.7
6037570301	67.72	98.92	95-100% (highest scores)	7330	Los Angeles	17.5	78	4.5	64.5	7.1	17.7	0.2	8.9	1.6
6071012400	67.63	98.90	95-100% (highest scores)	3617	San Bernardino	17.1	75.1	7.8	80.7	8.9	6	0.2	3.5	0.7
6037128302	67.55	98.89	95-100% (highest scores)	4688	Los Angeles	15	79.7	5.3	77.8	13	3.9	0.2	3.6	1.4
6037242700	67.52	98.88	95-100% (highest scores)	5273	Los Angeles	20.1	74.6	5.3	72.3	0.4	25.7	0.1	0.4	1.1
6065031300	67.44	98.86	95-100% (highest scores)	2651	Riverside	16.4	74.4	9.2	92.7	2.8	1.9	0.9	1.2	0.4
6071007000	67.44	98.85	95-100% (highest scores)	7898	San Bernardino	20.2	73	6.8	87	6.7	3.9	0.2	1.1	1.1
6037533001	67.42	98.84	95-100% (highest scores)	4527	Los Angeles	20.5	74.2	5.3	95	0.8	3.5	0.2	0.3	0.2
6037121222	67.39	98.83	95-100% (highest scores)	5293	Los Angeles	19.2	75.9	4.9	85	6.5	3.1	0.1	4.4	0.9
6037532800	67.31	98.81	95-100% (highest scores)	4409	Los Angeles	21.5	74.1	4.4	91.5	0.4	7.6	0	0.3	0.2
6037239601	67.30	98.80	95-100% (highest scores)	3755	Los Angeles	21.9	74.2	3.9	82.2	0.3	16.4	0.2	0.2	0.6
6037575401	67.20	98.79	95-100% (highest scores)	5155	Los Angeles	19.8	76.5	3.7	76.9	5.7	11.5	0.2	4.5	1.3
6077002401	67.08	98.78	95-100% (highest scores)	5001	San Joaquin	17.1	73.4	9.5	63.5	2.8	6.8	0.1	25.1	1.6
6037534201	67.05	98.76	95-100% (highest scores)	4439	Los Angeles	20	73.6	6.4	95.4	2.7	0.8	0.3	0.6	0.2
6037122410	66.93	98.75	95-100% (highest scores)	3794	Los Angeles	17.2	75.2	7.6	83.2	7.6	4.6	0	3.3	1.2
6037239702	66.87	98.74	95-100% (highest scores)	3927	Los Angeles	19.9	74.5	5.6	68.6	0.9	29	0.1	0	1.4
6037572800	66.79	98.73	95-100% (highest scores)	839	Los Angeles	15.6	80.5	3.9	19	25.3	38.6	1.5	9.4	6.2
6073003601	66.76	98.71	95-100% (highest scores)	3250	San Diego	19.5	75.1	5.4	89.6	2.9	5.5	0	1.5	0.5
6037228100	66.68	98.70	95-100% (highest scores)	4916	Los Angeles	20.1	75.8	4.1	91.3	0.4	7.3	0.1	0.1	0.8
6037292000	66.67	98.69	95-100% (highest scores)	6543	Los Angeles	17.5	76.4	6.1	59.7	11	13.2	0.1	14.2	1.8
6037434001	66.54	98.68	95-100% (highest scores)	4395	Los Angeles	15.7	77	7.3	87.3	2.9	0.3	0.1	9.1	0.3
6037122122	66.51	98.66	95-100% (highest scores)	2439	Los Angeles	15.9	77.4	6.7	80.3	12.6	4.4	0.3	1.7	0.6
6099001500	66.48	98.65	95-100% (highest scores)	6551	Stanislaus	14.9	72	13.1	54.9	31	4.6	0.4	6.4	2.7
6037242600	66.48	98.64	95-100% (highest scores)	4409	Los Angeles	27.2	70.1	2.7	59.9	0.9	38.2	0.1	0.2	0.7
6077000900	66.46	98.63	95-100% (highest scores)	5859	San Joaquin	17.7	73.8	8.5	49.6	30.6	6.7	0.9	8.5	3.6
6037228900	66.42	98.61	95-100% (highest scores)	3216	Los Angeles	20.7	75	4.3	86.1	0.5	9.8	0.2	2.9	0.5
6037433302	66.41	98.60	95-100% (highest scores)	1595	Los Angeles	19.3	73.4	7.3	82.6	3.3	0.3	0.3	13.1	0.4
6099001400	66.39	98.59	95-100% (highest scores)	6430	Stanislaus	14.7	71.7	13.6	32.2	52.3	3.9	0.8	6.6	4.2
6099002402	66.28	98.57	95-100% (highest scores)	5559	Stanislaus	21.7	72.9	5.4	83.1	12.9	0.8	0.2	1.4	1.7
6071005600	66.14	98.56	95-100% (highest scores)	7101	San Bernardino	21.2	74.7	4.1	73.8	8.5	13.4	0.1	2.9	1.2
6019003001	66.11	98.55	95-100% (highest scores)	3175	Fresno	20	74.3	5.7	48.8	12.2	5.9	1.2	30	1.9
6037402304	66.06	98.54	95-100% (highest scores)	3848	Los Angeles	20.6	75.4	4	90	3.8	2.7	0.3	2.8	0.5
6037122420	66.04	98.52	95-100% (highest scores)	5050	Los Angeles	16.3	76.5	7.2	79.9	9.3	3.1	0.1	6.4	1.2
6037536103	66.03	98.51	95-100% (highest scores)	5516	Los Angeles	15.4	77.1	7.5	94.6	3.7	0.5	0.3	0.6	0.2
6037199700	66.03	98.50	95-100% (highest scores)	3411	Los Angeles	13.1	78.2	8.7	69.4	11	0.8	0.2	18	0.6
6019006802	66.01	98.49	95-100% (highest scores)	4019	Fresno	18.6	71.9	9.5	87.2	10	0.1	0.2	2.2	0.2

6029002100	66.00	98.47	95-100% (highest scores)	3852 Kern	20.7	72.9	6.4	83.4	4.8	9.7	1	0.3	0.9
6037219902	65.96	98.46	95-100% (highest scores)	4113 Los Angeles	14	77.7	8.3	72.2	3.5	20.6	0.1	1.7	1.8
6037206300	65.94	98.45	95-100% (highest scores)	7540 Los Angeles	2	89.1	8.9	24.9	16.7	52.8	1	2.3	2.2
6037123206	65.93	98.44	95-100% (highest scores)	2945 Los Angeles	14.7	77.6	7.7	85	8.7	2.4	0.1	3.2	0.6
6077000600	65.82	98.42	95-100% (highest scores)	2279 San Joaquin	19.9	74.7	5.4	74.6	6	5.5	0.7	11.5	1.8
6065030104	65.81	98.41	95-100% (highest scores)	6922 Riverside	17.3	77	5.7	62.1	18.7	8.7	0.3	8.5	1.7
6071004004	65.79	98.40	95-100% (highest scores)	5076 San Bernardino	16.9	75.9	7.2	71	20.6	3.3	0.3	3.5	1.3
6037540901	65.75	98.39	95-100% (highest scores)	4994 Los Angeles	14.8	74.4	10.8	64.4	1.8	32.2	0.1	0.4	1.1
6037532603	65.70	98.37	95-100% (highest scores)	3319 Los Angeles	18.9	75.6	5.5	98	0.9	0.1	0.1	0.6	0.4
6029002400	65.67	98.36	95-100% (highest scores)	7478 Kern	23.1	71.6	5.3	70.8	18.4	5.3	0.6	3.1	1.8
6065042505	65.65	98.35	95-100% (highest scores)	3639 Riverside	23.1	72.3	4.6	80.1	8.9	6.8	0.2	2.4	1.6
6071002204	65.53	98.34	95-100% (highest scores)	6139 San Bernardino	19.2	76.1	4.7	78.5	11.6	4.9	0.2	4.1	0.7
6037239502	65.46	98.32	95-100% (highest scores)	3372 Los Angeles	18.8	75.8	5.4	76.3	0.2	22.3	0.2	0.1	0.8
6019003805	65.41	98.31	95-100% (highest scores)	6852 Fresno	18.4	74.7	6.9	56.2	18.9	10.2	1	11	2.7
6037553601	65.37	98.30	95-100% (highest scores)	4750 Los Angeles	18.1	77.1	4.8	75	4.6	15.8	0.1	3.2	1.2
6037402804	65.36	98.28	95-100% (highest scores)	4085 Los Angeles	19.5	76.8	3.7	79.2	4.5	3.5	0.2	11.6	1.1
6019001800	65.35	98.27	95-100% (highest scores)	4615 Fresno	15.2	72.3	12.5	60.6	32	1.1	0.7	4.3	1.2
6071001813	65.35	98.26	95-100% (highest scores)	4576 San Bernardino	19.3	75.7	5	91.6	3.3	3	0	1.2	0.9
6037534301	65.29	98.25	95-100% (highest scores)	4636 Los Angeles	18.5	76	5.5	95	2.7	1	0.1	0.6	0.6
6037206200	65.26	98.23	95-100% (highest scores)	3386 Los Angeles	3.1	71.3	25.6	19.5	12.2	25.9	0.4	39.7	2.2
6037432801	65.18	98.22	95-100% (highest scores)	2568 Los Angeles	10.9	61.8	27.3	59.3	3.3	0.1	0.4	36.8	0.2
6037601600	65.05	98.21	95-100% (highest scores)	4375 Los Angeles	17.3	75.4	7.3	92.5	2.5	2.2	0	2.2	0.5
6037229410	65.00	98.20	95-100% (highest scores)	3343 Los Angeles	19.5	75.5	5	83.6	1	14.4	0.1	0.4	0.5
6037601401	64.99	98.18	95-100% (highest scores)	4683 Los Angeles	13.1	80.6	6.3	58.9	5.1	32.4	0.3	1.9	1.4
6037239602	64.92	98.17	95-100% (highest scores)	3313 Los Angeles	19	76.4	4.6	77.1	0.7	20.6	0.4	0.1	1
6037127400	64.88	98.16	95-100% (highest scores)	5818 Los Angeles	16.9	78.2	4.9	73.2	15.3	5	0.1	4.8	1.5
6037302302	64.86	98.15	95-100% (highest scores)	4895 Los Angeles	10.1	76.5	13.4	34.4	44.6	1.7	0.3	16.9	2.2
6037228800	64.82	98.13	95-100% (highest scores)	5575 Los Angeles	20.7	75	4.3	88.1	0.6	9.1	0	1.5	0.7
6071005500	64.69	98.12	95-100% (highest scores)	8618 San Bernardino	23.8	72.5	3.7	73.6	7.8	14.9	0.3	1.4	2
6037533002	64.65	98.11	95-100% (highest scores)	2822 Los Angeles	19.2	74.5	6.3	97.3	1.2	1	0.1	0.1	0.3
6037543100	64.64	98.10	95-100% (highest scores)	6759 Los Angeles	15.1	73.5	11.4	49.6	0.7	47.9	0.2	0.6	1
6037575801	64.47	98.08	95-100% (highest scores)	2446 Los Angeles	19.9	77.1	3	79.3	9.5	6.9	0.5	2.5	1.3
6077001500	64.46	98.07	95-100% (highest scores)	8384 San Joaquin	19.6	72.9	7.5	58.8	21.8	5.6	1	10.3	2.6
6037532900	64.43	98.06	95-100% (highest scores)	6681 Los Angeles	19.7	75.6	4.7	92.7	0.3	6.5	0.1	0.1	0.3
6029002302	64.38	98.05	95-100% (highest scores)	3378 Kern	23.2	69.9	6.9	94	3	1.8	0.4	0.5	0.4
6037291130	64.33	98.03	95-100% (highest scores)	3582 Los Angeles	14.5	74.6	10.9	64	4.8	18.6	0	11.1	1.5
6037553701	64.32	98.02	95-100% (highest scores)	4176 Los Angeles	20	74.7	5.3	93	3.3	2.5	0.1	0.5	0.6
6037535101	64.30	98.01	95-100% (highest scores)	7306 Los Angeles	18.3	75.8	5.9	82.7	0.5	16.2	0.1	0.1	0.5
6019002601	64.22	97.99	95-100% (highest scores)	5821 Fresno	21.9	72.3	5.8	84.8	4.4	2.3	0.4	7	1
6071001309	64.22	97.98	95-100% (highest scores)	4793 San Bernardino	17.3	75.7	7	78.5	11.2	5.8	0.1	3.1	1.4
6099001800	64.21	97.97	95-100% (highest scores)	2196 Stanislaus	10.6	76.4	13	32.7	53.8	5.6	1.5	3	3.4
6037535200	64.19	97.96	95-100% (highest scores)	5820 Los Angeles	19.6	75.4	5	80.6	0.6	17.9	0.2	0.2	0.5
6037203300	64.17	97.94	95-100% (highest scores)	2607 Los Angeles	8.5	81.7	9.8	68.8	8.9	11	0.1	10.4	0.8
6037404703	64.09	97.93	95-100% (highest scores)	3178 Los Angeles	18.3	74.8	6.9	88.6	2.7	0.8	0.2	7.3	0.4
6037242200	64.03	97.92	95-100% (highest scores)	6554 Los Angeles	21.6	73.4	5	71.9	0.7	25.8	0.2	0.3	1
6037535603	64.01	97.91	95-100% (highest scores)	3493 Los Angeles	18	77	5	96.1	2.1	1	0	0.7	0.1
6019001700	63.99	97.89	95-100% (highest scores)	5701 Fresno	15.7	73	11.3	57.7	26.2	1.8	0.6	12.3	1.5
6037570202	63.99	97.88	95-100% (highest scores)	6415 Los Angeles	16.2	78.2	5.6	62.5	8.2	16.8	0.2	10.2	2.1
6037541604	63.96	97.87	95-100% (highest scores)	6207 Los Angeles	21.5	74.2	4.3	81.4	0.6	16.7	0.2	0.3	0.7
6037535300	63.92	97.86	95-100% (highest scores)	6251 Los Angeles	18.3	75.8	5.9	91.6	1	7	0	0.1	0.3
6037123304	63.90	97.84	95-100% (highest scores)	4687 Los Angeles	12.2	72.4	15.4	50.8	39.2	3.2	0.1	4.4	2.2
6037536102	63.90	97.83	95-100% (highest scores)	3164 Los Angeles	12.2	72.2	15.6	74.1	17.8	1.8	0.2	5.3	0.8
6037237202	63.82	97.82	95-100% (highest scores)	4388 Los Angeles	14.9	76.8	8.3	61.3	0.8	35.8	0.1	0.3	1.8
6065030400	63.80	97.81	95-100% (highest scores)	6414 Riverside	18.7	73.4	7.9	78	7.2	11.5	0.4	1.5	1.4
6037542502	63.76	97.79	95-100% (highest scores)	4284 Los Angeles	18.4	75.1	6.5	57.1	0.6	40.4	0.6	0.7	0.6
6037127104	63.75	97.78	95-100% (highest scores)	3573 Los Angeles	13.7	77.8	8.5	52.5	32.4	4.6	0.2	8	2.4
6019002800	63.65	97.77	95-100% (highest scores)	5205 Fresno	23.3	71.5	5.2	63.1	8	4.5	0.6	22.4	1.4
6037433901	63.58	97.76	95-100% (highest scores)	5593 Los Angeles	18	77	5	76.7	2.3	0.5	0.1	19.8	0.7
6071004003	63.54	97.74	95-100% (highest scores)	6178 San Bernardino	18.4	76.1	5.5	83.6	12.4	2	0.3	0.9	0.8
6037302505	63.53	97.73	95-100% (highest scores)	3749 Los Angeles	11.8	75.8	12.4	43.5	38.8	1.5	0.1	13.3	2.7
6077002000	63.53	97.72	95-100% (highest scores)	3977 San Joaquin	18.5	70.3	11.2	75.9	8.6	11.9	0.3	1.9	1.5
6037188100	63.51	97.70	95-100% (highest scores)	4076 Los Angeles	10.9	78.2	10.9	55.8	27.3	2.3	0.1	12.8	1.7
6065040204	63.49	97.69	95-100% (highest scores)	3716 Riverside	21.1	75.1	3.8	84.7	7.4	6.1	0.2	1	0.6
6037240500	63.49	97.68	95-100% (highest scores)	5655 Los Angeles	19.3	75	5.7	62.4	0.6	35.6	0	0.2	1.1
6071004104	63.49	97.67	95-100% (highest scores)	5257 San Bernardino	18.2	76	5.8	81.8	10.9	5.1	0.4	0.7	1.1
6037602509	63.43	97.65	95-100% (highest scores)	4118 Los Angeles	17.8	76.7	5.5	63.8	4.1	20	0.2	10.3	1.7
6047001005	63.40	97.64	95-100% (highest scores)	2406 Merced	18.2	73.2	8.6	51.9	30.5	8	0.7	6.2	2.8
6099003700	63.36	97.63	95-100% (highest scores)	4796 Stanislaus	16.3	75.2	8.5	51.7	38.8	0.8	0.7	5.5	2.5
6077002402	63.36	97.62	95-100% (highest scores)	2219 San Joaquin	18.4	72	9.6	69.8	4.5	10	0.2	13.4	2.1
6037239320	63.31	97.60	95-100% (highest scores)	3444 Los Angeles	18.1	77.1	4.8	85.2	0.5	13.1	0.1	0.2	0.8
6037542601	63.25	97.59	95-100% (highest scores)	3016 Los Angeles	21.7	73.1	5.2	85.1	0.6	13.7	0.1	0	0.4
6037122121	63.23	97.58	95-100% (highest scores)	2833 Los Angeles	14	78.2	7.8	79.4	10	1.3	0	8.3	1
6037219800	63.22	97.57	95-100% (highest scores)	3310 Los Angeles	15.6	78.8	5.6	74.3	1.5	21.5	0.2	1.1	1.4
6037541603	63.20	97.55	95-100% (highest scores)	2983 Los Angeles	20.9	72.4	6.7	79.1	1.1	19	0	0.1	0.6
6037402303	63.15	97.54	95-100% (highest scores)	3996 Los Angeles	17.2	75.6	7.2	75.5	13.6	6	0.5	3.3	1.2
6065042209	63.05	97.53	95-100% (highest scores)	4579 Riverside	10.5	83.9	5.6	40.4	24.3	12.9	0.5	18.6	3.3
6037433801	63.04	97.52	95-100% (highest scores)	6197 Los Angeles	18.7	75.2	6.1	90.5	2.4	0.1	0.1	6.3	0.5
6037601502	63.03	97.50	95-100% (highest scores)	3963 Los Angeles	18.7	76	5.3	94.4	1.9	1.9	0.1	1.4	0.3
6037121020	62.91	97.49	95-100% (highest scores)	3741 Los Angeles	12.5	78.4	9.1	59.6	26.8	1.6	0.1	9.9	2
6037572301	62.87	97.48	95-100% (highest scores)	3833 Los Angeles	16.3	76.2	7.5	58.8	4.1	8	0.1	26.8	2.2
6037204700	62.82	97.47	95-100% (highest scores)	4972 Los Angeles	16.2	74.8	9	97.2	1.5	0.2	0	0.9	0.2
6037535606	62.70	97.45	95-100% (highest scores)	1860 Los Angeles	20.2	74.3	5.5	98	1.2	0.3	0.1	0.1	0.3
6037239330	62.67	97.44	95-100% (highest scores)	2879 Los Angeles	20.3	75.3	4.4	86.1	0.6	12.9	0.1	0	0.2
6019002400	62.67	97.43	95-100% (highest scores)	4959 Fresno	20.8	72.9	6.3	67.5	9.2	4.5	1.2	16.4	1.3
6099000304	62.64	97.41	95-100% (highest scores)	5003 Stanislaus	18.1	75.1	6.8	72.8	22.6	1.2	0.7	0.8	1.8
6037122000	62.60	97.40	95-100% (highest scores)	5446 Los Angeles	10.1	76	13.9	36.5	41.5	1.2	0.4	18.2	2.3
6037534101	62.48	97.39	95-100% (highest scores)	2295 Los Angeles	19.2	77.2	3.6	95.7	2.2	0.2	0.4	0.8	0.6
6077003802	62.45	97.38	95-100% (highest scores)	6519 San Joaquin	17.7	76.7	5.6	39.2	14.2	18	0.2	23.8	4.5
6037602801	62.42	97.36	95-100% (highest scores)	3819 Los Angeles	18.8	75.4	5.8	62.2	1.1	34.1	0.1	0.7	1.7
6099002501	62.39	97.35	95-100% (highest scores)	7036 Stanislaus	18.2	77.4	4.4	68.6	18.7	2.8	0.3	8.2	1.4
6077003900	62.38	97.34	95-100% (highest scores)	1749 San Joaquin	15.4	73.4	11.2	72.6	25.7	0.3	0.3	0.6	0.5
6019001410	62.37	97.33	95-100% (highest scores)	9109 Fresno	18.4	74.1	7.5	51.8	12.5	5.2	0.4	28.2	1.9
6067000700	62.37	97.31	95-100% (highest scores)	2806 Sacramento	0	85.2	14.8	21.6	33.2	24.5	1.6	13.7	5.4
6071002110	62.37	97.30	95-100% (highest scores)	7020 San Bernardino	12.6	81.9	5.5	39.8	30.1	15.2	0.2	11.2	3.4
6037532303	62.34	97.29	95-100% (highest scores)	4464 Los Angeles	13.8	73.5	12.7	94.5	2.7	0.3	0.2	1.8	0.4
6037123010	62.33	97.28	95-100% (highest scores)	4580 Los Angeles	18.2	76.7	5.1	90.4	5.2	0.9	0.2	2.2	1
6037296210	62.31	97.26	95-100% (highest scores)	3019 Los Angeles	18.6	74.7	6.7	83.2	6.3	7.1	0.3	1.4	1.7
6037124103	62.29	97.25	95-100% (highest scores)	2030 Los Angeles	14.9	77.9	7.2	75	18.3	1.8	0.1	3.6	1.2
6071005400	62.28	97.24	95-100% (highest scores)	6590 San Bernardino	19.1	73.5	7.4	66.3	12.4	17	0.5	1.6	2.2
6037104703	62.25	97.23	95-100% (highest scores)	2397 Los Angeles	19.5	76.2	4.3	94.5	2.9	1.8	0	0.3	0.6
6037239310	62.24	97.21	95-100% (highest scores)	3996 Los Angeles	20.7	74.1	5.2	80.5	0.6	17.4	0.3	0.3	1
6037575802	62.21	97.20	95-100% (highest scores)	5167 Los Angeles	19.3	77.2	3.5	76.6	8.5	10.1	0.4	3.2	1.3
6037541002	62.20	97.19	95-100% (highest scores)	3209 Los Angeles	11.2	72	16.8	32.2	12.9	49.1	0.3	2.6	2.9
6037229300	62.20	97.17	95-100% (highest scores)	5498 Los Angeles	21.2	75.2	3.6	87.7	1	10.6	0	0.2	0.4
6037602600	62.19	97.16	95-100% (highest scores)	7910 Los Angeles	10.8	72.8	16.4	16.7	3.1	74.3	0.2	3.6	2.2
6037570402	62.14	97.15	95-100% (highest scores)	3496 Los Angeles	13.1	78.6	8.3	44.7	6.8	37.8	0.2	8.1	2.4
6037224010	62.14	97.14	95-100% (highest scores)	2433 Los Angeles	13.6	77.6	8.8	71.3	7.7	14.1	0.4	5.4	1.1
6071001400	62.13	97.12	95-100% (highest scores)	2923 San Bernardino	15.1	74.2	10.7	63.5	22.9	7.1	0.1	4.8	1.6
6031001100	62.11	97.11	95-100% (highest scores)	6613 Kings	20.4	71.6	8	72.8	13.2	9.2	0.8	2.1	2
6037294620	62.11	97.10	95-100% (highest scores)	4219 Los Angeles	16.1	75.1	8.8	95.5	1.5	1.7	0	0.9	0.4
6037294900	62.08	97.09	95-100% (highest scores)	3265 Los Angeles	20.3	74.5	5.2	88.6	3.6	4.6	0.2	2.5	0.6
6071001501	62.04	97.07	95-100% (highest scores)	4052 San Bernardino	19.5	76.5	4	89.3	7.8	1	0	1	0.9
6037294830	61.94	97.06	95-100% (highest scores)	3707 Los Angeles	19.4	74.2	6.4	90.1	3.1	3.9	0.4	1.3	1.3
6099001700	61.93	97.05	95-100% (highest scores)	2589 Stanislaus	18.8	74.5	6.7	65	15.9	6.2	0.9	10	2
6099001601	61.91	97.04	95-100% (highest scores)	4803 Stanislaus	19.4	75	5.6	70.5	12.9	4	0.2	10.3	2
6071005800	61.90	97.02	95-100% (highest scores)	3981 San Bernardino	24.1	71.7	4.2	67.1	7.1	20.3	0.6	2.8	2.1
6037541100	61.88	97.01	95-100% (highest scores)	3321 Los Angeles	15.6	74.9	9.5	49.8	0.8	47.9	0.2	0.5	0.8
6037533806	61.85	97.00	95-100% (highest scores)	4165 Los Angeles	19.3	76	4.7	96	2.9	0.5	0.3	0	0.2
6037542402	61.84	96.99	95-100% (highest scores)	3152 Los Angeles	16.2	75.6	8.2	55.4	1.5	39.6	0	2	1.5
6077002701	61.84	96.97	95-100% (highest scores)	6409 San Joaquin	18.7	72.6	8.7	66.8	25	1.8	0.5	3.5	2.4
6037208000	61.81	96.96	95-100% (highest scores)	6893 Los Angeles	14.6	80.6	4.8	71.3	7.5	4.6	0.1	15.2	1.3
6037229100	61.66	96.95	95-100% (highest scores)	4557 Los Angeles	20	75.9	4.1	89.8	0.6	9.2	0	0	0.5
6037301602	61.64	96.94	95-100% (highest scores)	3908 Los Angeles	10.3	78.9	10.8	42.6	38.1	2.2	0.1	13.9	3

6037533901	61.59	96.92	95-100% (highest scores)	6065 Los Angeles	17.5	78.1	4.4	96.4	2.2	0.3	0.2	0.5	0.4
6001409000	61.56	96.91	95-100% (highest scores)	3552 Alameda	17.2	74.3	8.5	48.8	1.7	43.3	0.1	4.3	1.8
6037541400	61.50	96.90	95-100% (highest scores)	7312 Los Angeles	20	74.6	5.4	79.6	0.8	18.6	0.1	0.4	0.5
6037534102	61.47	96.88	95-100% (highest scores)	6263 Los Angeles	19.1	76.6	4.3	96.7	1.9	0.3	0.1	0.7	0.3
6037573201	61.46	96.87	95-100% (highest scores)	4930 Los Angeles	17.6	76.2	6.2	60.5	4.6	14	0.1	18.8	1.9
6037531301	61.45	96.86	95-100% (highest scores)	5601 Los Angeles	19.1	73.6	7.3	98.6	0.8	0.4	0	0.1	0.1
6037553702	61.44	96.85	95-100% (highest scores)	4902 Los Angeles	18.1	76.2	5.7	91.6	1.8	4.7	0	1.7	0.2
6037536104	61.42	96.83	95-100% (highest scores)	4052 Los Angeles	18.7	74.5	6.8	91.5	4.6	2.1	0.1	1.2	0.5
6037535001	61.39	96.82	95-100% (highest scores)	4325 Los Angeles	19.8	75.1	5.1	88.4	0.8	10.1	0	0	0.6
6037543000	61.35	96.81	95-100% (highest scores)	4345 Los Angeles	14.5	72.9	12.6	41.6	0.5	55.4	0.1	0.3	2.1
6019000501	61.30	96.80	95-100% (highest scores)	2815 Fresno	24.4	70.4	5.2	79.5	5.7	6.2	0.4	7	1.1
6099003802	61.27	96.78	95-100% (highest scores)	5860 Stanislaus	19.8	72.2	8	74.4	20.9	1.1	0.5	1.8	1.3
6037404802	61.25	96.77	95-100% (highest scores)	4335 Los Angeles	16.1	76.9	7	81.5	3.5	1	0.3	13.1	0.5
6037542401	61.23	96.76	95-100% (highest scores)	4912 Los Angeles	16.8	74.1	9.1	56.1	0.8	40	0.1	1.7	1.4
6037199000	61.19	96.75	95-100% (highest scores)	5066 Los Angeles	14.7	75.3	10	61.2	2.6	0.8	0.1	34.8	0.5
6037187102	61.18	96.73	95-100% (highest scores)	3254 Los Angeles	11	77.4	11.6	60	16	1.4	0.1	21.1	1.3
6037553801	61.13	96.72	95-100% (highest scores)	4174 Los Angeles	20.4	73.9	5.7	75.2	3.9	16.8	0.1	2.8	1.3
6071001504	61.09	96.71	95-100% (highest scores)	5676 San Bernardino	19.4	74.8	5.8	69.7	8	11.3	0.2	9.5	1.3
6037232500	61.01	96.70	95-100% (highest scores)	4619 Los Angeles	15.8	75.2	9	56.9	0.6	40.8	0.2	0.2	1.4
6037404702	60.99	96.68	95-100% (highest scores)	5882 Los Angeles	15.3	78.4	6.3	75.8	3.2	1.2	0.1	18.8	0.8
6099000803	60.92	96.67	95-100% (highest scores)	4789 Stanislaus	17.5	69.5	13	50.7	33.6	5.3	0.6	6.2	3.7
6037241001	60.89	96.66	95-100% (highest scores)	4285 Los Angeles	18.8	76.1	5.1	61.7	0.9	35.6	0.3	0.5	1.1
6037402702	60.81	96.65	95-100% (highest scores)	6313 Los Angeles	21.9	75	3.1	86	4.8	5.7	0.2	2.3	1
6037240200	60.81	96.63	95-100% (highest scores)	5252 Los Angeles	19.2	75.3	5.5	70.2	1.1	27.5	0.2	0.2	0.8
6071001803	60.80	96.62	95-100% (highest scores)	2985 San Bernardino	11.5	71.2	17.3	55.6	30.9	6.7	0.4	5.5	0.8
6037530902	60.65	96.61	95-100% (highest scores)	4160 Los Angeles	17.4	69.8	12.8	95.7	1.3	0.2	0.1	2.5	0.2
6037602002	60.64	96.59	95-100% (highest scores)	3195 Los Angeles	16.2	78.4	5.4	76.8	3.8	14.1	0.1	4.2	1.1
6071007200	60.58	96.58	95-100% (highest scores)	6798 San Bernardino	16.4	73.9	9.7	49.9	17.5	6.6	0.3	23.2	2.6
6037433102	60.51	96.57	95-100% (highest scores)	5085 Los Angeles	16.5	76.4	7.1	60.4	2.2	0.1	0.1	36.6	0.6
6037550000	60.50	96.56	95-100% (highest scores)	1146 Los Angeles	6.6	86.2	7.2	33.6	32.7	13.5	0.3	16.5	3.3
6037540000	60.44	96.54	95-100% (highest scores)	6973 Los Angeles	19.1	75.9	5	90.6	1.6	5.5	0	1.6	0.6
6019004404	60.38	96.53	95-100% (highest scores)	3556 Fresno	17.5	76.4	6.1	59.2	19	5.7	1.1	12.8	2.3
6037220100	60.35	96.52	95-100% (highest scores)	2334 Los Angeles	10.9	69.5	19.6	28.7	4.5	58.3	0	6.1	2.4
6037540700	60.24	96.51	95-100% (highest scores)	3014 Los Angeles	18.8	76	5.2	61.3	0.6	36.7	0.2	0.2	1
6037404701	60.18	96.49	95-100% (highest scores)	5873 Los Angeles	15.4	76.9	7.7	82.3	2.9	0.5	0.1	13.7	0.4
6037531602	60.12	96.48	95-100% (highest scores)	4494 Los Angeles	17.6	73.7	8.7	98.5	1.1	0.2	0	0.1	0.2
6037204910	60.12	96.47	95-100% (highest scores)	3105 Los Angeles	18.3	73.9	7.8	96.6	1.5	0.3	0.3	0.7	0.5
6037543400	60.10	96.46	95-100% (highest scores)	4090 Los Angeles	13.2	73.7	13.1	56.2	5.9	17.2	0.2	18.2	2.3
6037239801	60.09	96.44	95-100% (highest scores)	3412 Los Angeles	19.4	75.5	5.1	75.2	0.4	23.6	0.1	0.1	0.6
6037553802	60.08	96.43	95-100% (highest scores)	6342 Los Angeles	16.7	73.8	9.5	71.7	9.2	13.1	0.5	4.5	0.9
6037530500	60.01	96.42	95-100% (highest scores)	4567 Los Angeles	14.6	74.4	11	98.1	0.9	0.1	0.1	0.4	0.4
6019008501	59.95	96.41	95-100% (highest scores)	4585 Fresno	21.4	71.5	7.1	93.7	3.9	0.1	0.2	1.7	0.5
6037408800	59.87	96.39	95-100% (highest scores)	3738 Los Angeles	16.2	77.8	6	71	11.3	7	0.2	9.4	1.2
6001409100	59.87	96.38	95-100% (highest scores)	2255 Alameda	17	73.5	9.5	51.8	1.6	41	0.1	3.7	1.8
6065030103	59.83	96.37	95-100% (highest scores)	2105 Riverside	14.3	76.3	9.4	65	24.4	4	0.7	3.2	2.6
6065041410	59.81	96.36	95-100% (highest scores)	3288 Riverside	19.6	75	5.4	94.1	4.5	0.2	0.4	0.5	0.2
6037297110	59.81	96.34	95-100% (highest scores)	4679 Los Angeles	13.7	78.3	8	64.5	20.4	8.2	0.4	4.1	2.3
6019002702	59.80	96.33	95-100% (highest scores)	5882 Fresno	22	73.4	4.6	80.7	4.1	3	0.3	11	1
6037530601	59.78	96.32	95-100% (highest scores)	3431 Los Angeles	15.8	75.4	8.8	95	1.7	0.4	0.1	2.2	0.6
6029002000	59.77	96.30	95-100% (highest scores)	7111 Kern	20.7	69	10.3	57.5	9.3	28.3	0.6	2.4	1.8
6037541500	59.74	96.29	95-100% (highest scores)	5836 Los Angeles	19.8	75.5	4.7	85.9	0.4	12.7	0	0.6	0.3
6037572500	59.69	96.28	95-100% (highest scores)	3365 Los Angeles	15.9	64.6	19.5	39.5	11.1	26.9	0.5	18.5	3.5
6037104310	59.68	96.27	95-100% (highest scores)	4921 Los Angeles	18.2	74.9	6.9	94	1.6	3.9	0.1	0.1	0.3
6065042508	59.68	96.25	95-100% (highest scores)	4888 Riverside	19.9	76.6	3.5	72.4	9.8	12.2	0.2	3.3	2.1
6037241120	59.67	96.24	95-100% (highest scores)	4564 Los Angeles	19.4	75.5	5.1	65.1	0.7	32.3	0.4	0.4	1.2
6037242300	59.66	96.23	95-100% (highest scores)	4586 Los Angeles	20.8	74.6	4.6	71.4	0.5	26.7	0.2	0.1	1
6001408800	59.65	96.22	95-100% (highest scores)	5547 Alameda	19	73.9	7.1	45.9	2.1	41.4	0.2	7.8	2.7
6029006201	59.60	96.20	95-100% (highest scores)	2877 Kern	18.6	72.3	9.1	69.3	26.9	0.9	0.6	1.3	0.9
6037122200	59.48	96.19	95-100% (highest scores)	4141 Los Angeles	15.9	77.4	6.7	86.4	8.9	0.7	0.1	3.1	0.8
6037543801	59.43	96.18	95-100% (highest scores)	5263 Los Angeles	11	73.6	15.4	45.4	10.9	4.8	0.3	35.5	3
6073003901	59.42	96.17	95-100% (highest scores)	4241 San Diego	19.7	75.7	4.6	86.5	1.8	10	0.4	0.8	0.6
6029004604	59.32	96.15	95-100% (highest scores)	15845 Kern	14.7	81.7	3.6	69.7	7.8	11	0.3	10.2	1
6029002600	59.30	96.14	95-100% (highest scores)	3539 Kern	19.2	73.1	7.7	72.4	14.8	9.1	1.1	0.9	1.7
6037231720	59.28	96.13	95-100% (highest scores)	4966 Los Angeles	17.3	74.8	7.9	78.1	1.2	17.2	0.1	2.2	1.3
6065030503	59.23	96.12	95-100% (highest scores)	3812 Riverside	24.1	73.1	2.8	84.6	6.1	5.6	0.3	1.5	1.8
6077003700	59.22	96.10	95-100% (highest scores)	3570 San Joaquin	16.5	71.1	12.4	63.4	28.6	1.7	0.6	4.2	1.5
6037191810	59.18	96.09	95-100% (highest scores)	3498 Los Angeles	12.3	83.3	4.4	72.7	17.1	4.1	0.1	4.2	1.8
6037502500	59.17	96.08	95-100% (highest scores)	4215 Los Angeles	15.7	72.5	11.8	88.8	7.8	0.9	0.2	1.5	0.7
6037542602	59.14	96.07	95-100% (highest scores)	5496 Los Angeles	18.4	75.9	5.7	71.8	1.1	25.2	0.2	1	0.7
6019003400	59.13	96.05	95-100% (highest scores)	4555 Fresno	15.6	71.5	12.9	50.5	23.4	4.3	0.7	19.6	1.6
6065040102	59.13	96.04	95-100% (highest scores)	4630 Riverside	15.9	76.3	7.8	74	21.7	1.7	0.5	1.3	0.8
6037530801	59.13	96.03	95-100% (highest scores)	6325 Los Angeles	18.6	74.6	6.8	96.4	1.6	0.5	0.1	1.1	0.3
6037227020	59.12	96.01	95-100% (highest scores)	3599 Los Angeles	20.5	75.4	4.1	92.8	0.3	6.5	0	0.2	0.3
6037533902	59.01	96.00	95-100% (highest scores)	4051 Los Angeles	16.5	78	5.5	96	2.4	0.2	0.3	0.8	0.3
6037530802	59.00	95.99	95-100% (highest scores)	3668 Los Angeles	16.6	73.8	9.6	95	2	0.4	0.4	2	0.3
6047002201	58.98	95.98	95-100% (highest scores)	6097 Merced	20.2	68.6	11.2	73.3	21.3	2.4	0.4	1.1	1.4
6037534502	58.94	95.96	95-100% (highest scores)	4257 Los Angeles	15.4	77.4	7.2	96.3	2.6	0.2	0	0.4	0.5
6037294701	58.93	95.95	95-100% (highest scores)	3019 Los Angeles	17.8	75.5	6.7	87.1	4.2	6.1	0.4	1.5	0.8
6037534900	58.85	95.94	95-100% (highest scores)	6569 Los Angeles	18.1	75.8	6.1	98	0.7	0.6	0.1	0.2	0.4
6037195802	58.85	95.93	95-100% (highest scores)	2881 Los Angeles	11.6	77.3	11.1	62.1	6.2	2.4	0.2	27.9	1.2
6037534405	58.80	95.91	95-100% (highest scores)	4292 Los Angeles	19.5	75.2	5.3	96.3	1.8	0.6	0.2	0.6	0.4
6071007108	58.79	95.90	95-100% (highest scores)	2202 San Bernardino	17.8	79.5	2.7	45.7	18.2	25.9	0.4	7	2.8
6037104401	58.76	95.89	95-100% (highest scores)	3357 Los Angeles	17.5	73.9	8.6	96.8	2.1	0.1	0.4	0.6	0.1
6037570403	58.76	95.88	95-100% (highest scores)	4587 Los Angeles	20	75.3	4.7	76.8	2.5	15.3	0.1	4.4	0.9
6111004902	58.75	95.86	95-100% (highest scores)	5091 Ventura	19.6	70.7	9.7	95.8	1.5	1.2	0.1	0.9	0.5
6037402501	58.73	95.85	95-100% (highest scores)	5577 Los Angeles	20.9	74.8	4.3	91.2	2.9	2.7	0.5	1.9	0.7
6037570203	58.73	95.84	95-100% (highest scores)	3973 Los Angeles	19.1	76.5	4.4	60.7	5.2	23.3	0.2	8.9	1.8
6037123204	58.69	95.83	95-100% (highest scores)	3449 Los Angeles	17.4	77.5	5.1	77.6	13.5	3.9	0.1	3.5	1.4
6037229200	58.69	95.81	95-100% (highest scores)	4394 Los Angeles	18.4	74.5	7.1	81.7	0.6	16.2	0.1	0.8	0.6
6037127220	58.66	95.80	95-100% (highest scores)	4931 Los Angeles	14.1	75.3	10.6	63.8	19.2	4.8	0.2	10.5	1.5
6073005100	58.65	95.79	95-100% (highest scores)	7140 San Diego	8.4	85.4	6.2	33.3	42	15.4	0.8	5.4	3.1
6037542106	58.64	95.78	95-100% (highest scores)	3373 Los Angeles	21.3	73.8	4.9	85.2	1.4	12	0.1	0.8	0.5
6037123203	58.60	95.76	95-100% (highest scores)	3765 Los Angeles	17.3	78.6	4.1	81.8	9.3	4	0.1	3.3	1.5
6037192700	58.57	95.75	95-100% (highest scores)	3513 Los Angeles	11.4	80.8	7.8	59.4	9.9	5	0.3	23.9	1.5
6037239201	58.55	95.74	95-100% (highest scores)	3562 Los Angeles	19.6	75.8	4.6	81.5	0.7	16.8	0.1	0.2	0.8
6037532700	58.53	95.72	95-100% (highest scores)	2990 Los Angeles	21	74.2	4.8	97.3	0.6	1.9	0	0.1	0.1
6037232120	58.51	95.71	95-100% (highest scores)	5263 Los Angeles	18.9	75.9	5.2	78.3	0.7	19.3	0.4	0.4	1
6037571701	58.46	95.70	95-100% (highest scores)	6352 Los Angeles	17.5	76.1	6.4	57.8	9	14.2	0.3	16.3	2.4
6037218500	58.46	95.69	95-100% (highest scores)	2869 Los Angeles	13.3	77.1	9.6	54.2	5.3	34.6	0.1	2.8	3
6071007604	58.44	95.67	95-100% (highest scores)	4306 San Bernardino	15.2	74	10.8	48.4	32.2	8.5	0.6	7.8	2.6
6037541605	58.38	95.66	95-100% (highest scores)	5323 Los Angeles	19	75.3	5.7	76.3	0.8	21.5	0.1	0.5	0.8
6037204810	58.38	95.65	95-100% (highest scores)	4478 Los Angeles	16.3	75.8	7.9	97.6	1.3	0	0.1	0.5	0.4
6019002701	58.33	95.64	95-100% (highest scores)	4673 Fresno	19.3	74.3	6.4	80.4	9.5	2.3	0.5	6.4	0.9
6037531504	58.31	95.62	95-100% (highest scores)	4414 Los Angeles	17.3	74.1	8.6	97.3	1.8	0.2	0.4	0.2	0.2
6037502301	58.28	95.61	95-100% (highest scores)	5461 Los Angeles	13.2	75.3	11.5	91.6	5.3	1.1	0.4	1.2	0.4
6099002004	58.28	95.60	95-100% (highest scores)	6022 Stanislaus	17.6	72.9	9.5	41.6	42.1	6.1	0.5	5.4	4.3
6071004800	58.28	95.59	95-100% (highest scores)	3282 San Bernardino	21	72.1	6.9	91.1	2.3	5	0.1	0.6	0.9
6037224020	58.27	95.57	95-100% (highest scores)	2789 Los Angeles	16.6	78.1	5.3	83.7	4.8	8.4	0.1	1.8	1.2
6037535002	58.26	95.56	95-100% (highest scores)	3681 Los Angeles	20.2	74.2	5.6	94.3	0.9	4.4	0	0.3	0.1
6037228720	58.25	95.55	95-100% (highest scores)	4492 Los Angeles	20.1	75.9	4	87.7	0.5	10.9	0.1	0	0.8
6037541606	58.18	95.54	95-100% (highest scores)	2506 Los Angeles	22.3	73.4	4.3	84	1	14.9	0	0	0.2
6037503000	58.16	95.52	95-100% (highest scores)	6057 Los Angeles	17.2	77.4	5.4	91.8	5.5	0.4	0.1	1.9	0.3
6037536000	58.15	95.51	95-100% (highest scores)	3720 Los Angeles	18.5	74.9	6.6	97	2.1	0.4	0.1	0.3	0.1
6037208302	58.14	95.50	95-100% (highest scores)	4360 Los Angeles	14.3	76.7	9	75.3	4.2	7.4	0.1	11.2	1.7
6025011400	58.13	95.48	95-100% (highest scores)	4580 Imperial	18.3	69.8	11.9	91.7	2.3	5.3	0.1	0.1	0.4
6037603001	58.13	95.47	95-100% (highest scores)	7139 Los Angeles	14.1	73.9	12	45.1	5	27.4	0.2	20.2	2.1
6037602900	58.13	95.46	95-100% (highest scores)	4427 Los Angeles	14.9	75.7	9.4	66.8	6.6	18.8	0.4	5.6	1.9
6059086407	58.12	95.45	95-100% (highest scores)	6488 Orange	14.9	77.9	7.2	53.8	30.3	2.8	0.2	10.8	2.1
6077005131	58.10	95.43	95-100% (highest scores)	4173 San Joaquin	12.3	75.8	11.9	38.2	51.1	4	0.9	3.6	2.3
6099003804	58.09	95.42	95-100% (highest scores)	6450 Stanislaus	17.7	71	11.3	51.9	40	1.3	0.8	3.8	2.3
6037541700	58.08	95.41	95-100% (highest scores)	6366 Los Angeles	16.6	76.6	6.8	82.8	1.4	14.7	0.1	0.8	0.2
6037219300	58.07	95.40	95-100% (highest scores)	3700 Los Angeles	16.2	74.3	9.5	56	2.5	33.7	0.4	4.8	2.6
6037190801	58.06	95.38	95-100% (highest scores)	2594 Los Angeles	5.7	76.1	18.2	46.3	36.4	6.7	0.2	8.1	2.4

6037206010	58.06	95.37	95-100% (highest scores)	3127 Los Angeles	13.4	73.4	13.2	51.5	4	3.3	0.2	39.7	1.3
6037104320	58.03	95.36	95-100% (highest scores)	5998 Los Angeles	17.7	74.2	8.1	91.1	1.1	5.8	0.2	1.4	0.4
6037408301	57.98	95.35	95-100% (highest scores)	5427 Los Angeles	15.2	76	8.8	85.8	5.3	0.5	0	8.1	0.4
6037190510	57.97	95.33	95-100% (highest scores)	4227 Los Angeles	8.9	83.8	7.3	39.3	32.9	7.4	0.1	17.5	2.8
6037402903	57.95	95.32	95-100% (highest scores)	4138 Los Angeles	15.6	77.2	7.2	79.1	5	4.1	0.2	10.8	0.8
6037128303	57.94	95.31	95-100% (highest scores)	3982 Los Angeles	17.7	78.9	3.4	85.4	7.3	2.7	0.3	3.4	1
6029000400	57.94	95.30	95-100% (highest scores)	4319 Kern	17.4	73.5	9.1	21.6	72.4	1.4	1.1	0.4	3.1
6099002005	57.93	95.28	95-100% (highest scores)	3631 Stanislaus	15.2	77.4	7.4	42.5	39.3	3.9	0.6	10.2	3.5
6037402406	57.86	95.27	95-100% (highest scores)	4776 Los Angeles	17.1	77.9	5	82.8	5.5	5.5	0.1	5.2	0.9
6037533603	57.85	95.26	95-100% (highest scores)	6617 Los Angeles	17.8	72.6	9.6	93.1	5.5	0.2	0.1	0.2	0.9
6107003400	57.84	95.25	95-100% (highest scores)	7016 Tulare	16.8	70.5	12.7	57.1	34.1	0.2	0.9	6.3	1.4
6111009100	57.83	95.23	95-100% (highest scores)	5279 Ventura	17.2	74.6	8.2	93	3.6	2.1	0.1	0.8	0.4
6019002602	57.81	95.22	95-100% (highest scores)	3520 Fresno	17.7	74.3	8	75.7	17.2	2.4	0.8	2.6	1.3
6071006601	57.78	95.21	95-100% (highest scores)	4564 San Bernardino	17.4	74.4	8.2	83.1	12.8	1.9	0.3	0.7	1.2
6037243000	57.76	95.19	95-100% (highest scores)	6769 Los Angeles	20.3	74.3	5.4	79.4	1.2	18.6	0.2	0	0.6
6037228710	57.76	95.18	95-100% (highest scores)	4235 Los Angeles	19.8	74.7	5.5	88.1	0.6	9.5	0	1.2	0.5
6099002604	57.76	95.17	95-100% (highest scores)	4681 Stanislaus	20.6	71.9	7.5	66.6	24	2.5	0.8	4.1	1.9
6037433101	57.76	95.16	95-100% (highest scores)	2281 Los Angeles	12.5	74.1	13.4	49.5	6.2	0.2	0.3	43.6	0.3
6029004800	57.75	95.14	95-100% (highest scores)	9297 Kern	21.3	70.2	8.5	88.3	1.5	1.3	0.3	8	0.7
6037603102	57.73	95.13	95-100% (highest scores)	4084 Los Angeles	12.1	71.1	16.8	45.1	6.5	11.8	0.1	34.6	2
6037533602	57.73	95.12	95-100% (highest scores)	5420 Los Angeles	17.9	76.1	6	93.4	5.2	0.2	0.1	0.4	0.8
6037502902	57.70	95.11	95-100% (highest scores)	4043 Los Angeles	15.3	77	7.7	86.6	8.2	1.6	0.1	2.9	0.6
6071004103	57.66	95.09	95-100% (highest scores)	5634 San Bernardino	20.2	74.2	5.6	79.6	6.2	8.5	0.2	4.2	1.2
6071000301	57.64	95.08	95-100% (highest scores)	8795 San Bernardino	20.5	74.6	4.9	77.9	5.3	5.4	0.3	10.1	1
6071003301	57.64	95.07	95-100% (highest scores)	4841 San Bernardino	17.8	73.5	8.7	78.7	13.6	4.3	0.3	2.4	0.8
6019003809	57.61	95.06	95-100% (highest scores)	4771 Fresno	17.3	77.6	5.1	49.7	23.3	12.2	0.8	11.3	2.6
6037542200	57.60	95.04	95-100% (highest scores)	6962 Los Angeles	18.9	74.7	6.4	75.1	1	21.8	0.1	1	1
6037502302	57.60	95.03	95-100% (highest scores)	3000 Los Angeles	18.3	74.7	7	93.2	3.5	0.8	0.3	1.7	0.5
6039000502	57.58	95.02	95-100% (highest scores)	10473 Madera	21.7	72.3	6	78.7	14.3	3.7	0.4	1.6	1.3
6019008302	57.57	95.01	95-100% (highest scores)	6562 Fresno	19.3	75.4	5.3	96.2	2.8	0.2	0.3	0.3	0.3
6037240900	57.54	94.99	90-95%	5620 Los Angeles	19.7	74.7	5.6	73.9	0.3	24.8	0.1	0.2	0.7
6037294120	57.54	94.98	90-95%	2370 Los Angeles	17.1	76.7	6.2	91.7	1.4	5.3	0.2	0.7	0.8
6037241002	57.54	94.97	90-95%	3606 Los Angeles	18.2	75.3	6.5	54.7	0.6	42.9	0	0.3	1.5
6099002401	57.52	94.96	90-95%	3567 Stanislaus	19.9	75.6	4.5	81.1	10	3.2	0.1	4.1	1.5
6037241202	57.51	94.94	90-95%	4943 Los Angeles	16.1	74.8	9.1	56	0.9	41	0.2	0.3	1.5
6037123020	57.47	94.93	90-95%	3432 Los Angeles	15.1	77.8	7.1	88	6.4	0.6	0	4.3	0.8
6037120300	57.46	94.92	90-95%	5531 Los Angeles	11.6	79.2	9.2	61.1	16.2	1.6	0.2	19.5	1.4
6071004201	57.46	94.90	90-95%	6854 San Bernardino	20.7	71.7	7.6	60	3.2	29.7	0.3	5.3	1.5
6037207102	57.45	94.89	90-95%	2553 Los Angeles	9.5	63.6	26.9	23.7	2.6	3.4	0.3	69.5	0.5
6037535604	57.41	94.88	90-95%	4435 Los Angeles	18.8	75.7	5.5	97.7	1.2	0.8	0	0.2	0.1
6071006500	57.41	94.87	90-95%	8386 San Bernardino	17.6	78.3	4.1	62.3	14.4	14.8	0.7	5.4	2.4
6037533105	57.40	94.85	90-95%	2580 Los Angeles	17.7	77.3	5	98.2	1.1	0.2	0	0	0.4
6067005205	57.39	94.84	90-95%	2109 Sacramento	12.5	74.6	12.9	21.1	46.7	13.5	1.1	11.6	6.1
6037120020	57.37	94.83	90-95%	4057 Los Angeles	16.1	78.5	5.4	76.4	5	2.1	0.3	15.2	1.1
6099003100	57.36	94.82	90-95%	4000 Stanislaus	15.5	74.3	10.2	50	45.2	1.1	0.7	1.3	1.7
6037402402	57.32	94.80	90-95%	7076 Los Angeles	14	80.9	5.1	67.7	14.7	4.4	0.2	11.2	1.8
6037532001	57.31	94.79	90-95%	3415 Los Angeles	13.5	71.6	14.9	93.8	4.8	0.2	0.1	0.9	0.2
6037405001	57.24	94.78	90-95%	6170 Los Angeles	15	77.5	7.5	88.5	4.1	1	0.1	5.7	0.5
6037533805	57.24	94.77	90-95%	3604 Los Angeles	17.2	76.3	6.5	96.2	2.9	0.3	0	0.3	0.2
6037534203	57.21	94.75	90-95%	3204 Los Angeles	19.2	72.6	8.2	96.5	2.2	0.3	0.1	0.6	0.2
6047001301	57.20	94.74	90-95%	3213 Merced	15.8	71.7	12.5	49.6	38.4	5.9	0.7	3.2	2.2
6037534803	57.16	94.73	90-95%	4930 Los Angeles	17	74.8	8.2	97.6	1.7	0.2	0.2	0.2	0.2
6065042904	57.15	94.72	90-95%	9352 Riverside	18.5	74.6	6.9	76.1	13.3	8	0.3	1.1	1.2
6037532606	57.12	94.70	90-95%	4284 Los Angeles	16.3	75.3	8.4	96.5	1.8	0.8	0	0.6	0.2
6037533601	57.11	94.69	90-95%	4484 Los Angeles	17.5	77.5	5	95.5	3.4	0.1	0.2	0.4	0.5
6037123205	57.08	94.68	90-95%	2645 Los Angeles	16.7	78.6	4.7	82.9	10.8	2.3	0.1	2.7	1.2
6037209103	57.05	94.67	90-95%	3216 Los Angeles	17.9	78.6	3.5	93.8	1.2	3.2	0.2	1.3	0.4
6013379000	57.04	94.65	90-95%	6117 Contra Costa	17.9	72.9	9.2	52.8	2.3	40.2	0.3	2.5	1.9
6037291300	57.04	94.64	90-95%	2601 Los Angeles	9.3	66.4	24.3	24.4	16.5	6.4	0.5	48.3	4.1
6037121900	56.98	94.63	90-95%	4110 Los Angeles	12.7	78.6	8.7	78.8	13	0.9	0.5	5.7	1.1
6037540600	56.96	94.61	90-95%	4271 Los Angeles	18.6	74.2	7.2	64.5	1	33	0.1	0.5	0.9
6107002901	56.96	94.60	90-95%	3729 Tulare	20	71.1	8.9	72.1	17.7	7.2	0.4	1	1.6
6037186401	56.91	94.59	90-95%	3452 Los Angeles	17.7	74.1	8.2	82.7	3.2	0.7	0	12.6	0.9
6037533103	56.90	94.58	90-95%	3577 Los Angeles	20.6	75.3	4.1	98.3	1.3	0.1	0	0.1	0.2
6037432802	56.90	94.56	90-95%	5821 Los Angeles	18.5	76.8	4.7	76.9	3	0.8	0	19.1	0.2
6013312000	56.88	94.55	90-95%	2292 Contra Costa	15.2	72.5	12.3	38.3	10.5	39	0.4	8.5	3.2
6037191000	56.87	94.54	90-95%	3228 Los Angeles	6.4	84	9.6	44.2	36.5	8.8	0.5	7.1	3
6071000904	56.82	94.53	90-95%	3248 San Bernardino	16.4	77.6	6	60.1	26.4	5.2	0.2	6.2	1.8
6037226700	56.78	94.51	90-95%	6170 Los Angeles	19.6	75.5	4.9	95.1	0.5	3.8	0	0.2	0.4
6065040101	56.78	94.50	90-95%	4287 Riverside	16.7	76	7.3	73.6	13.9	9	0.3	1.4	1.8
6099001900	56.72	94.49	90-95%	5257 Stanislaus	13	72.4	14.6	26.5	65.8	2.1	0.6	2	3.1
6037226410	56.69	94.48	90-95%	3491 Los Angeles	19	75.7	5.3	95.3	0.5	2.7	0.1	1.2	0.2
6037226420	56.69	94.46	90-95%	4906 Los Angeles	18.3	75.7	6	90.5	0.3	7.7	0	1.2	0.3
6037533202	56.68	94.45	90-95%	2762 Los Angeles	15.9	77.1	7	97.6	1.8	0.1	0	0.3	0.2
6077001800	56.63	94.44	90-95%	3939 San Joaquin	19.7	70.6	9.7	72.3	18.6	1.7	0.6	4.4	2.4
6065041600	56.63	94.43	90-95%	6230 Riverside	21.4	73.3	5.3	84.6	10.3	2.2	0.4	1.4	1.1
6067002200	56.60	94.41	90-95%	4004 Sacramento	19.5	70.4	10.1	18.5	32.4	25.4	0.5	16.6	6.7
6037240600	56.58	94.40	90-95%	4932 Los Angeles	19.5	74.8	5.7	67.1	0.7	31.1	0.2	0.2	0.8
6037123303	56.56	94.39	90-95%	3301 Los Angeles	13.3	78.2	8.5	60.2	26.5	3	0	7.8	2.5
6099002002	56.55	94.38	90-95%	4527 Stanislaus	15.2	74.6	10.2	52.4	42.3	0.3	0.8	1.3	2.9
6037540902	56.55	94.36	90-95%	4506 Los Angeles	13.4	73.3	13.3	37	1	60.4	0.2	0.2	1.2
6037541200	56.54	94.35	90-95%	5662 Los Angeles	13.6	71.1	15.3	29.3	0.7	68.1	0.2	0.4	1.3
6019004205	56.53	94.34	90-95%	5888 Fresno	18.8	72.1	9.1	49.2	28.7	12.7	0.7	6.2	2.4
6037402301	56.51	94.32	90-95%	5454 Los Angeles	17.6	76.8	5.6	80.5	8	4.7	0.1	5.9	0.8
6037241400	56.47	94.31	90-95%	3285 Los Angeles	19.2	74.9	5.9	62.7	0.5	34.9	0.1	0.5	1.4
6071001503	56.42	94.30	90-95%	4195 San Bernardino	23	73.7	3.3	90.2	4.8	2.4	0.3	1.4	0.9
6037603302	56.40	94.29	90-95%	3804 Los Angeles	11	71.6	17.4	33.9	10.6	5.8	0.2	46.5	3
6037127605	56.39	94.27	90-95%	3549 Los Angeles	15.7	80.7	3.6	72.7	14.2	5.9	0.1	5.9	1.3
6037432700	56.38	94.26	90-95%	5262 Los Angeles	14.6	76.4	9	77.3	3.1	0.2	0.2	18.9	0.3
6037433902	56.34	94.25	90-95%	3780 Los Angeles	14.4	75.6	10	86.5	4.4	0.1	0.1	8.7	0.3
6037553602	56.33	94.24	90-95%	4730 Los Angeles	17.1	78.3	4.6	70.1	4.2	20.7	0.1	3.9	1.1
6037218400	56.31	94.22	90-95%	4714 Los Angeles	15.1	77.3	7.6	66	4.1	26.5	0.1	1.2	2.1
6037433501	56.31	94.21	90-95%	1954 Los Angeles	17.6	74.8	7.6	87.9	4.1	0.1	0.1	7.3	0.6
6037228600	56.29	94.20	90-95%	5049 Los Angeles	19.6	76.5	3.9	86.9	1.3	10.8	0	0.3	0.8
6037570602	56.26	94.19	90-95%	6356 Los Angeles	14.8	78	7.2	45.8	11.2	11.5	0.2	28.9	2.3
6037543201	56.24	94.17	90-95%	3607 Los Angeles	16.3	74.7	9	59	1	38	0	0.6	1.4
6019001407	56.23	94.16	90-95%	4694 Fresno	22.6	73.7	3.7	59.3	8.7	16.2	0.3	13.7	1.8
6037531902	56.23	94.15	90-95%	4077 Los Angeles	14.5	75	10.5	97.1	2.2	0.1	0.1	0.3	0.2
6037232700	56.20	94.14	90-95%	5895 Los Angeles	16.4	77.2	6.4	73.6	0.7	24.2	0.1	0.5	1
6037291120	56.20	94.12	90-95%	2210 Los Angeles	16.7	76.5	6.8	66.3	1.9	28.6	0	2.6	0.5
6037531702	56.18	94.11	90-95%	4754 Los Angeles	18	73.6	8.4	96.8	1.9	0.4	0.1	0.4	0.4
6037542104	56.16	94.10	90-95%	3524 Los Angeles	18.8	75.5	5.7	85.6	0.5	12.2	0	1	0.6
6077003803	56.15	94.09	90-95%	5281 San Joaquin	12.9	78.9	8.2	48.7	26.3	11.6	0.6	10	2.8
6065041203	56.11	94.07	90-95%	3545 Riverside	18.5	77.4	4.1	78	13.5	4.3	0.4	2.4	1.4
6037121802	56.11	94.06	90-95%	3525 Los Angeles	13.3	78.6	8.1	67.7	17.3	5.6	0.2	8	1.2
6037434004	56.09	94.05	90-95%	2796 Los Angeles	15.2	74.7	10.1	90.6	3.8	0.2	0.4	4.6	0.5
6037185203	56.09	94.03	90-95%	3200 Los Angeles	15.1	76.3	8.6	84.8	7.4	1.3	0.1	5.8	0.7
6037532500	56.05	94.02	90-95%	4078 Los Angeles	16.7	78.1	5.2	96.3	1.1	0.6	0	1.6	0.3
6037407002	56.04	94.01	90-95%	3804 Los Angeles	15.7	74.4	9.9	87	2.9	1	0.1	8.5	0.5
6037239802	56.03	94.00	90-95%	4902 Los Angeles	20.1	74.9	5	72	0.4	26.5	0.1	0.3	0.6
6037228210	56.02	93.98	90-95%	3806 Los Angeles	17.7	75.5	6.8	84.3	1.7	10.9	0.1	2.8	0.3
6047001302	56.00	93.97	90-95%	3264 Merced	16.2	72.8	11	49.7	34.5	5.7	0.9	6.5	2.6
6037575402	56.00	93.96	90-95%	4065 Los Angeles	19.8	76.8	3.4	77	3.7	11.7	0.5	5.5	1.5
6037231710	55.98	93.95	90-95%	4358 Los Angeles	19	77	4	79.1	0.5	18.8	0.3	0.3	1
6065042010	55.98	93.93	90-95%	5887 Riverside	18.2	74.2	7.6	75.1	15.5	6.4	0.2	1.1	1.7
6037405102	55.97	93.92	90-95%	5069 Los Angeles	15.8	75.4	8.8	78.4	4.2	1.2	0.1	15.3	0.7
6037203600	55.95	93.91	90-95%	5394 Los Angeles	17.9	74.6	7.5	97.4	1.2	0.2	0.2	0.7	0.3
6037570204	55.93	93.90	90-95%	4130 Los Angeles	15.7	73.7	10.6	53.6	15.2	16.1	0.4	13.4	1.2
6065040201	55.92	93.88	90-95%	5897 Riverside	18.4	76.2	5.4	63.5	25.1	5.3	0.2	4.3	1.5
6037104822	55.92	93.87	90-95%	2277 Los Angeles	17.1	73	9.9	87.7	3.3	1.1	0	7.1	0.7
6077005127	55.91	93.86	90-95%	5510 San Joaquin	17.5	76.5	6	42.7	21.9	7.5	0.5	23.8	3.6
6037124104	55.89	93.85	90-95%	2439 Los Angeles	13.1	78.1	8.8	60.3	27.1	6.7	0.2	3.5	2.2
6037302503	55.89	93.83	90-95%	4330 Los Angeles	10	76.5	13.5	25.4	60	0.6	0	11.5	2.5

6059110500	55.88	93.82	90-95%	8631 Orange	16.4	75.2	8.4	60.6	13.5	5.3	0.2	18.7	1.7
6071002401	55.88	93.81	90-95%	8946 San Bernardino	18.5	76	5.5	88.6	7.8	1.2	0.1	1.6	0.6
6037408401	55.86	93.79	90-95%	4289 Los Angeles	11.7	75.8	12.5	69.2	9.4	1.5	0.1	19	0.7
6019003807	55.86	93.78	90-95%	3362 Fresno	17.6	72.5	9.9	53.1	25.9	7.3	0.7	11.5	1.5
6071004604	55.85	93.77	90-95%	5177 San Bernardino	15.4	75	9.6	64.4	23.8	8.3	0.5	1.3	1.7
6065041101	55.84	93.76	90-95%	5139 Riverside	24.8	72.6	2.6	85.8	7.6	3.5	0.9	1.2	1.1
6019006900	55.81	93.74	90-95%	3170 Fresno	17.5	72	10.5	81.3	12.5	0.2	0.2	5.1	0.7
6037310501	55.81	93.73	90-95%	3205 Los Angeles	12.3	80.8	6.9	57.7	27.8	2.7	0.2	9.2	2.3
6037237101	55.80	93.72	90-95%	3705 Los Angeles	18.5	75.3	6.2	68.3	0.6	30	0.1	0.2	0.7
6071000303	55.79	93.71	90-95%	7169 San Bernardino	17	77.4	5.6	82.3	10.9	1.6	0.1	4.5	0.6
6077005110	55.77	93.69	90-95%	6488 San Joaquin	14.7	74.3	11	37.1	53.7	2.2	0.7	3	3.3
6037204410	55.73	93.68	90-95%	2363 Los Angeles	16.8	76.2	7	93.6	1.8	0.2	0.3	3.5	0.7
6077005122	55.71	93.67	90-95%	4829 San Joaquin	15.4	77.7	6.9	35.6	43.2	3.3	0.5	14.1	3.3
6059011601	55.69	93.66	90-95%	7955 Orange	18.3	77.7	4	73.8	15	2.2	0.2	7.5	1.3
6037534406	55.68	93.64	90-95%	4609 Los Angeles	19.1	76.1	4.8	97.5	1.3	0.5	0.2	0.2	0.3
6037237300	55.65	93.63	90-95%	5262 Los Angeles	13.9	74.1	12	39.6	1	56.8	0.1	0.5	2
6037207301	55.65	93.62	90-95%	4521 Los Angeles	1.8	83.7	14.5	20.8	37.2	20.2	0.9	15.9	4.9
6037531901	55.62	93.61	90-95%	6529 Los Angeles	16	75.1	8.9	97.3	1.9	0.2	0.1	0.4	0.2
6037192620	55.62	93.59	90-95%	3868 Los Angeles	12.5	81.6	5.9	68.6	5.5	2.6	0.3	21.5	1.5
6077001700	55.60	93.58	90-95%	3998 San Joaquin	20.1	72.8	7.1	74.6	18	1.9	0.6	2.9	2
6071005300	55.59	93.57	90-95%	5516 San Bernardino	18.2	75	6.8	67.1	17.4	11.8	0.5	1.6	1.6
6037199201	55.58	93.56	90-95%	4089 Los Angeles	15.4	75.7	8.9	68.4	2.5	0.8	0.1	27.4	0.8
6037433504	55.55	93.54	90-95%	4679 Los Angeles	17.3	75.8	6.9	79.5	2.7	0.2	0	16.9	0.6
6019006201	55.52	93.53	90-95%	2608 Fresno	21.8	71.1	7.1	91.4	6.2	0	0.5	1.1	0.7
6037531101	55.51	93.52	90-95%	5091 Los Angeles	17.8	73	9.2	97.6	1.6	0.1	0.1	0.4	0.3
6037602105	55.44	93.50	90-95%	4273 Los Angeles	15.8	77.3	6.9	66.6	6.4	19.5	0.4	5.5	1.6
6071001001	55.35	93.49	90-95%	4990 San Bernardino	15.9	76.7	7.4	66.8	19.2	6.4	0.3	5.7	1.6
6001409200	55.29	93.48	90-95%	3152 Alameda	17.4	75	7.6	49.5	1.7	40.1	0.4	6.4	1.9
6037572900	55.29	93.47	90-95%	5250 Los Angeles	17.9	75	7.1	70.2	2.7	8.6	0.1	16.6	1.7
6037208402	55.28	93.45	90-95%	2775 Los Angeles	12.4	79	8.6	71.7	2.7	1.5	0.3	22.4	1.2
6019002100	55.26	93.44	90-95%	5419 Fresno	14.6	74	11.4	56.2	33.1	4.9	1	2.9	1.9
6037132102	55.26	93.43	90-95%	5310 Los Angeles	12.7	76.6	10.7	46.6	35	4.6	0.2	10.8	2.8
6037402902	55.18	93.42	90-95%	6445 Los Angeles	18.3	73.9	7.8	78.6	6.1	4.5	0.2	9.8	0.8
6019001900	55.16	93.40	90-95%	2914 Fresno	16.1	71.2	12.7	56.3	25.6	5.3	0.5	9	3.3
6077002100	55.14	93.39	90-95%	5546 San Joaquin	20.1	72.9	7	65.4	5	15.6	0.2	11	2.8
6047000201	55.14	93.38	90-95%	3626 Merced	17.1	72.5	10.4	56.9	36	0.2	0.6	4.1	2.1
6047002100	55.12	93.37	90-95%	3862 Merced	16.4	73.6	10	60	35.6	1.2	0.2	1.9	1
6037127102	55.09	93.35	90-95%	4726 Los Angeles	15.4	78.6	6	61.9	21.7	5.7	0.1	8.7	1.9
6113010203	55.09	93.34	90-95%	5397 Yolo	17.6	70.1	12.3	45.7	37.6	4.8	1.5	6.5	3.9
6037532605	55.07	93.33	90-95%	3715 Los Angeles	16.9	72.3	10.8	96.1	1.3	1	0	1.3	0.3
6037232400	55.05	93.32	90-95%	6957 Los Angeles	15	76.5	8.5	56.4	1.3	39.6	0.1	0.8	1.8
6071001809	55.03	93.30	90-95%	4476 San Bernardino	15.6	78.8	5.6	73.1	19.1	4.3	0.2	2.3	1.1
6077005129	55.01	93.29	90-95%	3582 San Joaquin	16.3	75.2	8.5	53.2	28.2	2.9	0.9	12.3	2.6
6019002300	54.99	93.28	90-95%	3624 Fresno	15.6	78.1	6.3	57.5	27.6	6.6	1.2	4.9	2.3
6037408139	54.98	93.27	90-95%	4482 Los Angeles	16.9	76.5	6.6	95	2.3	0	0.1	2.5	0.1
6047000902	54.97	93.25	90-95%	8419 Merced	18.5	73.7	7.8	48.5	30.7	3.2	0.4	14.7	2.6
6037187200	54.95	93.24	90-95%	3132 Los Angeles	12.4	78	9.6	76.3	8.9	1	0.1	12.2	1.5
6037209200	54.95	93.23	90-95%	2785 Los Angeles	11.1	84.7	4.2	48.5	19.5	5.7	0.3	23.2	2.8
6067004502	54.94	93.21	90-95%	4795 Sacramento	19.6	71.2	9.2	52.3	17	14.1	0.4	12.3	3.8
6065042507	54.89	93.20	90-95%	5011 Riverside	15.5	77.4	7.1	58.8	14.8	17.3	0.4	6	2.7
6071007107	54.88	93.19	90-95%	3302 San Bernardino	22.3	72.5	5.2	52.6	21.6	19.7	0.4	3.1	2.6
6037302002	54.88	93.18	90-95%	3532 Los Angeles	7.5	74	18.5	15.3	62.6	2.3	0.2	15.6	4
6037535901	54.86	93.16	90-95%	5757 Los Angeles	15.3	77.6	7.1	95.1	3.4	0.5	0.1	0.6	0.4
6037575101	54.84	93.15	90-95%	4754 Los Angeles	17.6	78.1	4.3	50	9.6	15.5	0.3	21.8	2.8
6037228220	54.84	93.14	90-95%	4389 Los Angeles	20.9	75.5	3.6	86.8	0.9	11.3	0	0.1	1
6037536200	54.84	93.13	90-95%	7289 Los Angeles	15.1	77.1	7.8	87.3	8.5	1.1	0.2	2.2	0.7
6037121010	54.83	93.11	90-95%	4989 Los Angeles	12.3	77.4	10.3	62.6	24.1	1	0.3	10.5	1.5
6037221401	54.81	93.10	90-95%	3359 Los Angeles	11.8	63.5	24.7	42.5	8.8	42.4	0.3	3.8	2.2
6077002800	54.81	93.09	90-95%	6052 San Joaquin	20.3	74.1	5.6	61.9	9.2	15.6	0.4	10.2	2.7
6037601700	54.80	93.08	90-95%	5646 Los Angeles	16.9	78.7	4.4	91	1.7	4.7	0.1	1.9	0.6
6047001502	54.78	93.06	90-95%	2822 Merced	19.8	72.5	7.7	82.8	5.1	4.7	0.1	6.1	1.2
6071004700	54.77	93.05	90-95%	5791 San Bernardino	20.3	71.7	8	87.2	3.6	7.5	0.2	1.1	0.4
6019004701	54.74	93.04	90-95%	6682 Fresno	18.7	68.8	12.5	49.1	28.3	14.5	0.6	4.9	2.7
6037204420	54.72	93.03	90-95%	3138 Los Angeles	17.9	75.5	6.6	94.1	2.2	2.1	0.1	1.1	0.5
6037123410	54.71	93.01	90-95%	4247 Los Angeles	13.5	76.4	10.1	57.2	31.8	2.9	0.1	6	2
6037294810	54.70	93.00	90-95%	3991 Los Angeles	21.1	74.9	4	93.2	1.6	2.2	0.1	2	0.9
6037433700	54.69	92.99	90-95%	3294 Los Angeles	15.3	73.8	10.9	86.8	4.2	0.3	0	8.3	0.5
6037552400	54.65	92.98	90-95%	2794 Los Angeles	16	76.4	7.6	83.9	6.4	2.1	0.4	6.1	1
6037121210	54.65	92.96	90-95%	3122 Los Angeles	12.9	75.4	11.7	70.7	11	1.1	0.3	16	1
6047001602	54.63	92.95	90-95%	7243 Merced	22.2	73.2	4.6	63.3	7.6	6.2	0.2	21.4	1.3
6037302301	54.62	92.94	90-95%	3790 Los Angeles	9.8	76.7	13.5	21.1	51.1	1.7	0.3	23.5	2.3
6071001104	54.61	92.92	90-95%	5058 San Bernardino	13.4	71.9	14.7	60.3	32.6	2.4	0.2	3	1.5
6039000900	54.57	92.91	90-95%	9612 Madera	22.8	72.8	4.4	91.3	3.5	3	0.6	1.1	0.5
6037540300	54.54	92.90	90-95%	5267 Los Angeles	16.5	77.6	5.9	95.3	1.3	2.4	0.2	0.2	0.5
6037404600	54.52	92.89	90-95%	1422 Los Angeles	12.9	76.5	10.6	90.6	6.1	0.4	0.1	2	0.8
6077002503	54.51	92.87	90-95%	2560 San Joaquin	22.9	68.4	8.7	45.1	4.5	17.7	0.5	28.9	3.3
6071009400	54.51	92.86	90-95%	3493 San Bernardino	18.9	73	8.1	44.9	26.5	20.2	1.1	2.4	5
6037602802	54.50	92.85	90-95%	4304 Los Angeles	12.8	73.5	13.7	32.6	1.5	62	0.1	1.8	1.9
6037533501	54.49	92.84	90-95%	3090 Los Angeles	16.5	77	6.5	97.9	1.4	0.3	0	0.1	0.2
6029001600	54.49	92.82	90-95%	1390 Kern	13.4	69.8	16.8	40.9	37.2	11.2	2.4	5.5	2.8
6037575300	54.49	92.81	90-95%	4947 Los Angeles	18.2	73.7	8.1	58.6	2.7	15.8	0.5	20	2.3
6059089003	54.46	92.80	90-95%	4012 Orange	17.8	76.4	5.8	60	7.6	0.7	0.2	30.3	1.2
6037190520	54.46	92.79	90-95%	3728 Los Angeles	9.1	77.4	13.5	37.8	42.7	2.5	0.1	14.4	2.5
6019002501	54.46	92.77	90-95%	5098 Fresno	23.6	71.5	4.9	63.7	7.7	8.9	0.8	17.5	1.4
6037242000	54.46	92.76	90-95%	3938 Los Angeles	20.8	73	6.2	65.2	0.7	33	0.2	0.4	0.6
6071001308	54.45	92.75	90-95%	5100 San Bernardino	17.2	77.5	5.3	79.4	11.5	4.7	0.2	3.5	0.6
6071004101	54.41	92.74	90-95%	5698 San Bernardino	18.9	75.9	5.2	80.1	10.6	6.2	0.2	1.9	1
6037296220	54.40	92.72	90-95%	4307 Los Angeles	15.4	74.1	10.5	65.2	13	11.4	0.2	8.1	2.1
6037602700	54.38	92.71	90-95%	3045 Los Angeles	9.3	72.8	17.9	14	2	79.8	0.2	2.2	1.7
6037294820	54.38	92.70	90-95%	3579 Los Angeles	21	75.3	3.7	94.3	2.4	2	0.5	0.6	0.1
6037531102	54.37	92.69	90-95%	3548 Los Angeles	19.1	71.3	9.6	98.2	0.6	0.7	0	0.3	0.1
6071001101	54.37	92.67	90-95%	4092 San Bernardino	18.8	76.2	5	80.8	11.6	3.3	0.1	3.2	0.9
6037228420	54.35	92.66	90-95%	3150 Los Angeles	20	76.7	3.3	88.3	0.4	10.5	0	0.1	0.7
6037127210	54.34	92.65	90-95%	5531 Los Angeles	14.8	76.4	8.8	61.7	20	6.1	0.1	10.4	1.7
6037531503	54.32	92.63	90-95%	3116 Los Angeles	17.3	75.8	6.9	98.1	1.5	0.1	0	0.1	0.2
6099001603	54.31	92.62	90-95%	5706 Stanislaus	19	74.4	6.6	67.1	20.9	2.4	0.4	7.1	2.2
6037195720	54.30	92.61	90-95%	2304 Los Angeles	10.8	81.1	8.1	72.4	17.1	1.2	0.2	7.5	1.6
6107000501	54.26	92.60	90-95%	6712 Tulare	21.1	72.3	6.6	93.1	5.9	0.1	0.1	0.5	0.3
6037603005	54.26	92.58	90-95%	5591 Los Angeles	15.5	77.8	6.7	46.3	4.8	32.4	0.1	13.8	2.5
6037201402	54.25	92.57	90-95%	4311 Los Angeles	12	69.8	18.2	76.6	3.7	0.5	0.3	18.6	0.3
6065041001	54.19	92.56	90-95%	2832 Riverside	18.7	76	5.3	77.4	16.1	3.4	0.4	1.9	0.9
6019008301	54.18	92.55	90-95%	5989 Fresno	21.2	74.6	4.2	96.5	2.3	0.3	0.2	0.5	0.2
6037190802	54.18	92.53	90-95%	2784 Los Angeles	8.3	82.5	9.2	50.1	34.9	4.2	0.2	8.8	1.8
6071004202	54.15	92.52	90-95%	5176 San Bernardino	17.6	71.6	10.8	67.5	4.6	23.9	0.5	2.3	1.2
6037540502	54.13	92.51	90-95%	6552 Los Angeles	23.1	74.2	2.7	84.1	1.8	13	0.1	0.5	0.6
6037570404	54.04	92.50	90-95%	3501 Los Angeles	17.2	77.5	5.3	66.6	3.6	22.7	0.7	5.2	1.3
6037236100	54.01	92.48	90-95%	5265 Los Angeles	12.2	70.5	17.3	17.6	1.7	71.4	0.2	6.4	2.7
6037407701	54.00	92.47	90-95%	5401 Los Angeles	16	74.6	9.4	86	2.3	1.2	0.1	9.7	0.7
6013365002	54.00	92.46	90-95%	5462 Contra Costa	18.8	76	5.2	54	3.1	30.9	0.2	8.7	3.1
6037531502	54.00	92.45	90-95%	3273 Los Angeles	19.4	74.1	6.5	98	1.2	0.1	0	0.2	0.5
6037433304	53.96	92.43	90-95%	4726 Los Angeles	15.1	73.4	11.5	65.5	3.7	1.2	0.1	28.9	0.6
6077002202	53.96	92.42	90-95%	5417 San Joaquin	22.6	71.1	6.3	69.6	3.2	11.4	0.3	13.7	1.9
6071006401	53.95	92.41	90-95%	3343 San Bernardino	24.1	71.6	4.3	77.1	6.7	11.6	0.4	3.1	1.2
6037291110	53.94	92.40	90-95%	3510 Los Angeles	17.2	74.5	8.3	42.1	0.8	54	0.1	0.7	2.4
6037434003	53.90	92.38	90-95%	4273 Los Angeles	17.5	75.4	7.1	85.8	4.1	0.2	0.1	9.3	0.4
6037206031	53.90	92.37	90-95%	2957 Los Angeles	3.8	91.7	4.5	12.2	38.2	7.1	0.3	37.8	4.3
6037533300	53.89	92.36	90-95%	3558 Los Angeles	20.5	74.6	4.9	97.9	1.8	0.1	0	0	0.1
6037240700	53.89	92.34	90-95%	6161 Los Angeles	18	74.4	7.6	62.9	0.4	35.5	0	0.3	0.9
6037199900	53.88	92.33	90-95%	2683 Los Angeles	15.7	73.7	10.6	79.3	1.3	1	0	17.9	0.5
6037535702	53.86	92.32	90-95%	5522 Los Angeles	16.9	77.1	6	96.4	2.4	0.4	0	0.4	0.4
6099002702	53.86	92.31	90-95%	6940 Stanislaus	18.9	74.5	6.6	65.6	24.4	1.5	0.3	6.2	2.1
6067006900	53.84	92.29	90-95%	4763 Sacramento	13.1	73.3	13.6	31.1	45.2	11.4	1.1	6.8	4.3
6037575803	53.83	92.28	90-95%	2837 Los Angeles	13.9	68.3	17.8	55.5	15.9	15.2	0.2	11	2.3

6037123301	53.81	92.27	90-95%	4559 Los Angeles	11.4	79.8	8.8	45.6	22.6	4.7	0.2	25	1.8
6037302504	53.80	92.26	90-95%	4234 Los Angeles	9.8	78.2	12	32.9	50.8	0.8	0	12.6	2.9
6085503105	53.78	92.24	90-95%	2484 Santa Clara	13.5	73.2	13.3	31.5	4.6	0.8	0.6	61.2	1.2
6037533703	53.76	92.23	90-95%	4236 Los Angeles	19.4	75.4	5.2	98.1	1.3	0	0.1	0.3	0.1
6037209402	53.74	92.22	90-95%	3728 Los Angeles	15.5	79.8	4.7	86.1	4.7	3.3	0.2	5.2	0.5
6037502802	53.72	92.21	90-95%	1380 Los Angeles	10.3	55.7	34	65.8	13.5	8.6	0.4	11.1	0.7
6037228310	53.71	92.19	90-95%	4449 Los Angeles	18.9	76.7	4.4	92.3	0.5	6.5	0	0.1	0.5
6037296600	53.70	92.18	90-95%	5218 Los Angeles	14.8	76.3	8.9	70.8	18	5.9	0.4	3.2	1.7
6037231400	53.70	92.17	90-95%	4688 Los Angeles	14.8	76.8	8.4	63.3	1.4	31.2	0.2	2.5	1.5
6037402102	53.64	92.16	90-95%	4815 Los Angeles	15.6	76.3	8.1	65.4	11.2	15.4	0.1	6	1.9
6013377000	53.63	92.14	90-95%	6962 Contra Costa	18.2	74.3	7.5	63.1	7	23	0.2	4.8	1.9
6037570501	53.62	92.13	90-95%	7419 Los Angeles	15.5	78.3	6.2	55.3	11.7	16	0.2	14.4	2.5
6037402101	53.61	92.12	90-95%	4623 Los Angeles	14.5	78.4	7.1	70.9	5.1	13.7	0.2	8.3	1.8
6037311801	53.60	92.10	90-95%	3033 Los Angeles	10.8	81.1	8.1	43.6	40.9	4.1	0.1	8	3.2
6037195710	53.59	92.09	90-95%	4328 Los Angeles	11.9	79.6	8.5	68.9	12.8	2.6	0.2	13.9	1.5
6037433305	53.58	92.08	90-95%	4893 Los Angeles	18.7	75.2	6.1	77.1	2.8	0.6	0.1	19.1	0.3
6037603704	53.57	92.07	90-95%	6348 Los Angeles	18.7	77.5	3.8	58	5.1	28.9	0.1	6.2	1.6
6037602508	53.55	92.05	90-95%	7022 Los Angeles	17.2	76.9	5.9	52.5	5.3	34.8	0.1	5	2.2
6037534001	53.54	92.04	90-95%	5613 Los Angeles	18.2	76.9	4.9	97	2.2	0.1	0.3	0.4	0.1
6037241300	53.51	92.03	90-95%	2313 Los Angeles	17.5	72.9	9.6	51.7	1	45.1	0.1	0.4	1.8
6037573300	53.51	92.02	90-95%	4323 Los Angeles	16.2	77.9	5.9	37	3.5	15.9	0.2	41.8	1.6
6071009117	53.50	92.00	90-95%	8267 San Bernardino	15	78.9	6.1	56	25.2	14.2	0.3	1.6	2.6
6037121801	53.46	91.99	90-95%	3942 Los Angeles	16.5	78.4	5.1	75.8	13.2	3.6	0.3	5.5	1.6
6099000602	53.45	91.98	90-95%	2953 Stanislaus	13.6	77.3	9.1	41.8	43.1	4.1	0.3	7.5	3.2
6037232110	53.45	91.97	90-95%	3191 Los Angeles	16.7	76.7	6.6	70.7	0.5	27.2	0	0.1	1.4
6047002401	53.44	91.95	90-95%	1756 Merced	14.8	73.5	11.7	49.3	46.6	1	0.3	0.9	1.9
6099000510	53.43	91.94	90-95%	8480 Stanislaus	16.7	76.6	6.7	51	39.3	2.7	0.3	4	2.7
6037570603	53.43	91.93	90-95%	4435 Los Angeles	19.8	73.5	6.7	23.6	9.7	54.8	0.2	8.5	3.3
6065046500	53.41	91.92	90-95%	9277 Riverside	4.1	95.4	0.5	27.6	18.8	8.3	0.2	41.2	4
6037302202	53.41	91.90	90-95%	5254 Los Angeles	9.8	75.9	14.3	23.8	59.7	1	0	12.1	3.4
6037404801	53.41	91.89	90-95%	7305 Los Angeles	15.7	75	9.3	76.6	4.1	0.7	0	17.9	0.6
6037551800	53.40	91.88	90-95%	7533 Los Angeles	13.9	77.4	8.7	64.8	17.4	7.3	0.3	8.8	1.4
6037224420	53.36	91.87	90-95%	2369 Los Angeles	13.2	78.3	8.5	82.8	5.3	6.8	0.3	4.3	0.6
6037535102	53.36	91.85	90-95%	4517 Los Angeles	19	75	6	81.4	0.3	17.5	0.2	0.2	0.5
6037502004	53.34	91.84	90-95%	4359 Los Angeles	16.6	77	6.4	89.1	7.6	0.5	0	2.4	0.3
6037231100	53.31	91.83	90-95%	3350 Los Angeles	13.5	81.3	5.2	72.4	4	20.1	0.8	1.4	1.2
6037197500	53.27	91.81	90-95%	3889 Los Angeles	9.7	82	8.3	57.9	24.7	1.7	0.2	13.7	1.9
6065042902	53.27	91.80	90-95%	4930 Riverside	16	73.4	10.6	65.5	26.8	4.7	0.3	1.2	1.4
6037533701	53.27	91.79	90-95%	3934 Los Angeles	19.5	74.5	6	96.8	2.4	0.3	0	0.3	0.3
6037576301	53.26	91.78	90-95%	4176 Los Angeles	14.3	77	8.7	51.2	14.7	19.7	0.2	11.6	2.6
6019002905	53.26	91.76	90-95%	2889 Fresno	20.2	72.2	7.6	57.1	17.2	9	1	13.5	2.2
6037218210	53.23	91.75	90-95%	4457 Los Angeles	15	76.2	8.8	71.4	3.2	22.5	0	1	1.8
6029001902	53.21	91.74	90-95%	4679 Kern	18	76	6	51.5	34.2	9.1	0.8	1.9	2.5
6037204200	53.19	91.73	90-95%	3303 Los Angeles	17.5	75.1	7.4	94	1.5	0.5	0	3.5	0.5
6037237201	53.19	91.71	90-95%	3506 Los Angeles	16.2	77	6.8	74.6	0.9	22.8	0.1	0.3	1.2
6037530602	53.19	91.70	90-95%	1590 Los Angeles	14.9	74.8	10.3	92.1	2.5	0.8	0.7	3.6	0.3
6037502100	53.18	91.69	90-95%	5110 Los Angeles	12.9	69.9	17.2	81	14.7	1	0.2	2.4	0.8
6037533402	53.16	91.68	90-95%	4105 Los Angeles	17.3	76.3	6.4	98.1	1.3	0.1	0.2	0.1	0.2
6037405101	53.15	91.66	90-95%	5304 Los Angeles	15	76	9	81.1	4.5	0.8	0.1	13	0.4
6037301502	53.14	91.65	90-95%	6908 Los Angeles	8.6	77	14.4	8.6	77.7	1.1	0	7.6	4.9
6025012200	53.14	91.64	90-95%	7804 Imperial	15.3	74.7	10	98.1	1.1	0.1	0	0.5	0.1
6071002402	53.11	91.63	90-95%	8434 San Bernardino	20	76.2	3.8	88	6.7	3.5	0.1	0.9	0.8
6037219010	53.11	91.61	90-95%	2814 Los Angeles	15.2	75.3	9.5	65.7	2.6	26.9	0	2.8	2.1
6029004402	53.09	91.60	90-95%	5437 Kern	22.7	70.9	6.4	91.9	3.8	3.2	0.2	0.4	0.5
6065042901	53.04	91.59	90-95%	7385 Riverside	18	73.5	8.5	74.4	16.6	5.9	0.2	1.3	1.5
6037576302	53.03	91.58	90-95%	4101 Los Angeles	17.5	78.6	3.9	59.4	7.8	16.6	0.1	14.1	2.1
6037552302	53.02	91.56	90-95%	3648 Los Angeles	12.7	68.7	18.6	60.6	18.7	5.4	0.2	13.4	1.7
6037542000	53.02	91.55	90-95%	5732 Los Angeles	18.1	75.1	6.8	71.1	0.9	25.6	0.6	1.1	0.7
6037207103	53.01	91.54	90-95%	2077 Los Angeles	9	70.2	20.8	10.4	2.1	0.8	0.2	86	0.5
6037231500	53.01	91.52	90-95%	4752 Los Angeles	12.8	75	12.2	54	1.2	40.7	0.1	2.4	1.6
6037575901	52.97	91.51	90-95%	3454 Los Angeles	16.5	79.1	4.4	51.2	15.6	22.3	0.5	7.3	3.1
6037190901	52.96	91.50	90-95%	4742 Los Angeles	12.5	81.6	5.9	76.1	14	3.6	0.1	5	1.1
6099003803	52.95	91.49	90-95%	3004 Stanislaus	17.7	75.9	6.4	64.2	24.1	0.7	0.2	8.8	1.9
6037121101	52.91	91.47	90-95%	2932 Los Angeles	14.4	78.2	7.4	69.6	17.2	2	0.2	9.8	1.3
6059086802	52.85	91.46	90-95%	5913 Orange	14.8	77.4	7.8	55	19	2.8	0.2	21.5	1.6
6037191620	52.82	91.45	90-95%	2789 Los Angeles	11.2	66.6	22.2	60.3	20.2	3.6	0.3	14.2	1.4
6037124204	52.82	91.44	90-95%	3071 Los Angeles	12.8	82.4	4.8	63.9	23.2	4.7	0.3	5.7	2.3
6037228500	52.80	91.42	90-95%	5220 Los Angeles	21.1	75.1	3.8	89.2	0.6	9.4	0	0.1	0.7
6037533702	52.80	91.41	90-95%	3585 Los Angeles	18.8	76.5	4.7	97.2	2	0.2	0	0.6	0.1
6037231600	52.79	91.40	90-95%	7110 Los Angeles	15.3	76.5	8.2	65.7	1.5	29.7	0.1	1.4	1.6
6037201700	52.79	91.39	90-95%	5093 Los Angeles	11	80.7	8.3	65.1	7.9	6.7	0.4	17.9	1.9
6047001601	52.79	91.37	90-95%	4498 Merced	23.8	72.6	3.6	79	6	6.4	0.3	7.3	1
6019006602	52.78	91.36	90-95%	5597 Fresno	19	70.7	10.3	87.6	9.1	0.1	0.3	2.2	0.6
6071001812	52.72	91.35	90-95%	4321 San Bernardino	18.9	73.1	8	85.2	5.7	3.6	0.2	3.8	1.5
6037211122	52.70	91.34	90-95%	3075 Los Angeles	10.9	83.7	5.4	47	10.1	6.9	0.5	34	1.5
6037407200	52.69	91.32	90-95%	7315 Los Angeles	15	75.4	9.6	89.1	4.9	1.2	0.1	4.2	0.4
6029003000	52.69	91.31	90-95%	7374 Kern	20.6	72.7	6.7	72.9	14.9	8.6	0.7	1.5	1.4
6037543306	52.69	91.30	90-95%	7214 Los Angeles	11.4	74.4	14.2	32.3	7.7	20.2	0.3	36.9	2.6
6037211320	52.69	91.29	90-95%	3184 Los Angeles	12	81.4	6.6	60.6	8.4	4.6	0.1	24.9	1.3
6037218300	52.68	91.27	90-95%	5520 Los Angeles	12.2	78	9.8	52.8	6.8	33.7	0.2	3.4	3.1
6037301701	52.67	91.26	90-95%	2849 Los Angeles	8.1	74	17.9	21.7	56.2	1.2	0.4	16.4	4.1
6107004200	52.66	91.25	90-95%	6529 Tulare	22.5	71.8	5.7	80.4	15.6	2.5	0.2	0.7	0.6
6037600502	52.62	91.23	90-95%	2355 Los Angeles	12.7	76	11.3	49.5	1.9	45.6	0.3	1.5	1.2
6099000805	52.59	91.22	90-95%	6188 Stanislaus	15.6	73.3	11.1	39.4	45.2	4	0.7	6.8	3.9
6107000302	52.59	91.21	90-95%	3427 Tulare	20.1	73.3	6.6	83.6	14.7	0	0.6	0.5	0.6
6037531000	52.58	91.20	90-95%	5629 Los Angeles	17.3	74.1	8.6	97.4	1.3	0.3	0.2	0.7	0.2
6059087405	52.58	91.18	90-95%	5912 Orange	21.3	74.3	4.4	85.5	8.4	0.9	0.2	4.1	0.9
6037296500	52.54	91.17	90-95%	3910 Los Angeles	15.5	75.3	9.2	72.8	13.2	9.1	0.2	3.5	1.1
6001407300	52.54	91.16	90-95%	2598 Alameda	14.4	79.7	5.9	63.1	13.2	12.7	0.1	9.2	1.8
6037432601	52.53	91.15	90-95%	6564 Los Angeles	14.1	76.4	9.5	60	5.1	0.5	0.1	33.5	0.8
6059001202	52.52	91.13	90-95%	3586 Orange	18	74.1	7.9	80	14.6	1.1	0	3.6	0.8
6077000402	52.48	91.12	90-95%	4582 San Joaquin	18	71.9	10.1	47.6	25.4	16.8	0.8	5.5	3.9
6037534501	52.47	91.11	90-95%	5201 Los Angeles	15.9	76.5	7.6	96.8	2.2	0.2	0.1	0.3	0.4
6067004501	52.47	91.10	90-95%	3529 Sacramento	19.5	74.1	6.4	48.6	8.3	7.3	0.5	32.7	2.6
6037540203	52.38	91.08	90-95%	5594 Los Angeles	20.3	75.2	4.5	89.5	1.6	7.9	0.1	0.6	0.4
6059074003	52.37	91.07	90-95%	3137 Orange	14.7	80.7	4.6	76.1	11.9	1.2	0.1	9.8	0.9
6037533403	52.33	91.06	90-95%	2973 Los Angeles	15.6	75	9.4	95.9	2.5	0.6	0.2	0.7	0.1
6037199400	52.32	91.05	90-95%	4668 Los Angeles	14	76.4	9.6	76.5	3.9	0.7	0.1	18	0.9
6037433200	52.29	91.03	90-95%	6163 Los Angeles	14.7	75	10.3	70.4	4.7	0.4	0.1	24	0.4
6037542900	52.28	91.02	90-95%	3285 Los Angeles	18.3	73.6	8.1	76.3	0.9	20.5	0.1	1.2	1.1
6067005002	52.27	91.01	90-95%	6284 Sacramento	17	68.3	14.7	30.7	21.3	21.5	0.7	21.1	4.7
6037402405	52.26	91.00	90-95%	3006 Los Angeles	15.9	76	8.1	83	2.8	11.9	0.1	1.5	0.7
6037541300	52.26	90.98	90-95%	6044 Los Angeles	17.6	74.2	8.2	58.6	0.8	38.8	0.2	0.5	1.1
6037573003	52.24	90.97	90-95%	1802 Los Angeles	13.5	78.7	7.8	46.6	18.7	14.8	0.4	16.9	2.6
6037228410	52.20	90.96	90-95%	3320 Los Angeles	19.6	76.7	3.7	91.9	1	6.1	0	0.1	0.9
6071001307	52.20	90.94	90-95%	4163 San Bernardino	15.5	76.8	7.7	78	14.2	2.1	0.4	4	1.2
6059086502	52.18	90.93	90-95%	6551 Orange	20	75.8	4.2	92.3	4.2	0.5	0.2	2	0.6
6019005202	52.17	90.92	90-95%	3619 Fresno	18.6	73.5	7.9	50.9	19.3	7	1	19.8	2
6037535607	52.15	90.91	90-95%	4775 Los Angeles	17	77.6	5.4	97.5	1.5	0.7	0	0.2	0.1
6047002000	52.13	90.89	90-95%	7835 Merced	15.4	71.3	13.3	51.2	45.1	0.7	0.2	1.3	1.5
6071004302	52.11	90.88	90-95%	4413 San Bernardino	17.3	69.4	13.3	76.9	7.8	12.6	0.4	1.2	1.1
6037191720	52.10	90.87	90-95%	3770 Los Angeles	12.6	79.3	8.1	73.3	13.4	3.2	0	9.2	1.1
6037186403	52.09	90.86	90-95%	2899 Los Angeles	13	75.7	11.3	71.7	6.2	1	0.1	20.1	0.9
6037132101	52.08	90.84	90-95%	4259 Los Angeles	14.2	77.9	7.9	50.4	31.5	6.6	0.1	8.6	2.7
6037540501	52.07	90.83	90-95%	6943 Los Angeles	13.6	82.2	4.2	75.3	6.2	16.9	0	0.7	0.9
6065045303	52.07	90.82	90-95%	3035 Riverside	21.8	72	6.2	94	4	1.1	0	0.7	0.2
6067007301	52.07	90.81	90-95%	4644 Sacramento	17.8	74.3	7.9	25.2	51.7	12.5	1.1	3.8	5.8
6037240800	52.05	90.79	90-95%	4377 Los Angeles	18.2	76.5	5.3	63.4	0.8	34	0.3	0.4	1
6065042620	52.05	90.78	90-95%	10463 Riverside	19.1	76	4.9	65.3	13.5	12.2	0.2	6	2.8
6037222002	52.03	90.77	90-95%	4655 Los Angeles	14.6	78.1	7.3	65.3	3	29.1	0	0.6	2
6037204300	52.02	90.76	90-95%	4787 Los Angeles	15.1	72.8	12.1	94.9	1.6	0.2	0.2	2.7	0.4
6067004702	52.01	90.74	90-95%	4945 Sacramento	19.4	72.1	8.5	39.9	16.9	18.4	0.6	19.7	4.4
6037209102	52.00	90.73	90-95%	5267 Los Angeles	14.6	77.6	7.8	76.4	3.1	5.8	0.2	13.6	0.9

6037124201	51.93	90.72	90-95%	3506 Los Angeles	11.5	78.1	10.4	57.9	30.6	2.4	0.1	6.9	2.1
6037301702	51.93	90.71	90-95%	5556 Los Angeles	8.8	77.3	13.9	17.6	63.5	0.8	0.3	13.8	4.1
6037191201	51.90	90.69	90-95%	4591 Los Angeles	6.2	77.2	16.6	29.9	50.5	3.2	0.3	13.2	2.9
6037199800	51.89	90.68	90-95%	5631 Los Angeles	13.7	75.8	10.5	61.8	1.5	0.2	0.2	36	0.3
6037240010	51.88	90.67	90-95%	3673 Los Angeles	19.8	74.7	5.5	75.4	0.8	22.9	0.2	0.3	0.5
6025011500	51.87	90.65	90-95%	6232 Imperial	14.9	73.2	11.9	88.1	7.5	2.1	0.4	1.1	0.8
6037533804	51.84	90.64	90-95%	4543 Los Angeles	17.4	76.4	6.2	94.8	3.7	0.1	0.4	0.5	0.5
6037543903	51.84	90.63	90-95%	3804 Los Angeles	12.2	73.8	14	43.1	8	5	0	41.4	2.5
6037433306	51.80	90.62	90-95%	3333 Los Angeles	16.1	75.3	8.6	66	2.3	0.7	0.1	30.3	0.7
6037602103	51.78	90.60	90-95%	6992 Los Angeles	15.7	75.7	8.6	68.3	4.8	19.7	0.3	4.7	2.2
6071000201	51.78	90.59	90-95%	4195 San Bernardino	15.5	76.3	8.2	68.5	16.6	5.9	0.1	7.5	1.4
6037197700	51.77	90.58	90-95%	5103 Los Angeles	9.8	80.1	10.1	30.1	9.6	2.3	0.2	56	1.7
6037553902	51.76	90.57	90-95%	5809 Los Angeles	17.3	77.1	5.6	76.7	8.7	8.9	0.2	4.6	0.9
6037310703	51.73	90.55	90-95%	5114 Los Angeles	9.6	79	11.4	17.9	66.4	2	0.1	8.8	4.8
6037240020	51.73	90.54	90-95%	5055 Los Angeles	19.6	73.3	7.1	70.9	0.5	27.6	0	0.2	0.7
6037502700	51.71	90.53	90-95%	6956 Los Angeles	12.7	74.5	12.8	87	7.8	1.4	0.5	2.6	0.7
6019002903	51.70	90.52	90-95%	4329 Fresno	20.9	68.7	10.4	62	10.1	8.2	0.3	18	1.4
6037219020	51.69	90.50	90-95%	4798 Los Angeles	15.3	75.1	9.6	64.7	2.8	27.7	0.3	2.6	1.9
6065041704	51.65	90.49	90-95%	3908 Riverside	20.6	75.1	4.3	89.1	7.2	0.6	0.3	2	0.7
6037125320	51.63	90.48	90-95%	4843 Los Angeles	8.3	82.9	8.8	36.4	38.5	10	0.2	10.8	4.3
6037602104	51.62	90.47	90-95%	5416 Los Angeles	16.3	77.5	6.2	63.4	3.9	25.3	0.3	5	2
6019003003	51.60	90.45	90-95%	4154 Fresno	19.4	70.5	10.1	49.8	18.2	8	0.5	21.1	2.4
6067006400	51.58	90.44	90-95%	5347 Sacramento	16.4	75.3	8.3	28.9	40.5	13.5	1.1	11.8	4.4
6075023103	51.58	90.43	90-95%	3725 San Francisco	21.4	73	5.6	16.2	3.5	55.8	0.3	18.1	6.1
6037540102	51.57	90.41	90-95%	6972 Los Angeles	16.6	77.5	5.9	85.4	1.5	11.7	0.1	0.7	0.6
6037573202	51.56	90.40	90-95%	6230 Los Angeles	16.7	78.2	5.1	58	3.2	17	0.2	20.1	1.5
6037575201	51.55	90.39	90-95%	4667 Los Angeles	16.6	77.2	6.2	48.9	3.1	17.8	0.1	27.8	2.1
6037554301	51.53	90.38	90-95%	3554 Los Angeles	16.4	78.1	5.5	62	11.4	18.1	0.1	6.6	1.9
6037231900	51.50	90.36	90-95%	5968 Los Angeles	19.3	75.7	5	83.7	0.7	14.8	0.1	0.3	0.5
6037532604	51.48	90.35	90-95%	2806 Los Angeles	19	77.2	3.8	96.7	1.5	0.7	0	0.9	0.2
6037127920	51.47	90.34	90-95%	4100 Los Angeles	14	77.4	8.6	54.6	33.8	2.8	0.1	6.2	2.6
6037553504	51.47	90.33	90-95%	5368 Los Angeles	17	77.6	5.4	81.4	3.9	9.1	0.1	4.9	0.6
6037533201	51.46	90.31	90-95%	2805 Los Angeles	16.6	77.5	5.9	98.2	1.1	0.4	0.1	0.1	0.1
6001409500	51.44	90.30	90-95%	3122 Alameda	18.9	75.2	5.9	67.8	2.3	24.4	0.4	3.6	1.6
6071000825	51.44	90.29	90-95%	3905 San Bernardino	17	78.9	4.1	56.4	22	12.2	0.2	7.3	1.9
6019006501	51.43	90.28	90-95%	6662 Fresno	24	70.7	5.3	91.2	6.2	0.2	0.3	1.3	0.8
6073003603	51.41	90.26	90-95%	4228 San Diego	18.3	74.3	7.4	88.2	3.2	4.3	0.1	3.1	1.1
6037127103	51.40	90.25	90-95%	2939 Los Angeles	14.9	79.9	5.2	61.7	25.9	5.2	0	5.2	2
6071006301	51.39	90.24	90-95%	5324 San Bernardino	15.6	68.5	15.9	60.6	23.8	11.9	0.8	1.8	1.2
6037502200	51.39	90.23	90-95%	6585 Los Angeles	13.4	75.4	11.2	86.3	10.5	0.7	0.2	1.5	0.8
6037120030	51.35	90.21	90-95%	2675 Los Angeles	20.2	76.5	3.3	92.8	2.7	0.3	0	3.8	0.3
6019001600	51.33	90.20	90-95%	5099 Fresno	15.4	72.2	12.4	65.7	23.5	0.8	0.5	8.1	1.5
6071001310	51.32	90.19	90-95%	5814 San Bernardino	15.3	75	9.7	75.4	18.8	2.4	0.3	2.1	1
6037240402	51.31	90.18	90-95%	3854 Los Angeles	16.8	74.9	8.3	57.2	1.1	38.8	0.3	0.3	2.2
6019007004	51.29	90.16	90-95%	5520 Fresno	16.7	69.1	14.2	63	28.3	0.7	0.4	6	1.6
6037224600	51.28	90.15	90-95%	3425 Los Angeles	18.3	74.7	7	86.4	2.5	8.8	0	1.2	1.1
6037575902	51.28	90.14	90-95%	4762 Los Angeles	9.3	80.5	10.2	37.3	29.4	19.9	0.4	8.9	4.2
6071009500	51.28	90.12	90-95%	7094 San Bernardino	17.8	72.2	10	44.9	34.1	13.9	1.3	2	3.8
6065048800	51.24	90.11	90-95%	4512 Riverside	17.7	77.6	4.7	59.9	10.8	19.1	0.1	7.7	2.4
6071007603	51.24	90.10	90-95%	4605 San Bernardino	17.4	71.5	11.1	53.4	20.2	17.3	0.5	6.7	1.9
6037191120	51.24	90.09	90-95%	4135 Los Angeles	9.4	78.4	12.2	53.7	29.8	3.8	0.1	9.8	2.7
6113010102	51.23	90.07	90-95%	7702 Yolo	15.6	73	11.4	42.9	44.2	2.3	0.6	6.3	3.7
6065031601	51.22	90.06	90-95%	4390 Riverside	18.5	73.7	7.8	65.1	23.2	4.3	0.8	4.9	1.8
6037125310	51.22	90.05	90-95%	4750 Los Angeles	11.1	81.8	7.1	47.5	36.3	8	0.2	5.2	2.8
6107004102	51.20	90.04	90-95%	2028 Tulare	19.2	68	12.8	65.3	28.8	0.4	0.7	3.3	1.4
6047000505	51.19	90.02	90-95%	6156 Merced	18.7	72.4	8.9	61.6	27.3	1.3	0.3	7.9	1.6
6037542103	51.19	90.01	90-95%	4114 Los Angeles	19.7	75.5	4.8	83.5	0.8	14.4	0	0.8	0.5
6037240300	51.18	90.00	85-90%	5691 Los Angeles	19.1	75.5	5.4	70.1	1.7	26.4	0.2	0.2	1.2
6071000203	51.17	89.99	85-90%	4474 San Bernardino	13.6	76.5	9.9	65.4	18.6	4.1	0.2	10	1.5
6037218120	51.17	89.97	85-90%	4530 Los Angeles	13.9	77.6	8.5	69	2.3	11.1	0.2	15.5	2
6037220000	51.17	89.96	85-90%	5345 Los Angeles	13.3	76.7	10	49.5	2.5	42.9	0.2	2.4	2.5
6037482402	51.16	89.95	85-90%	6971 Los Angeles	10.6	74.5	14.9	35.5	4.6	0.2	0.1	58.6	1
6037104810	51.15	89.94	85-90%	5328 Los Angeles	16.5	76	7.5	93.8	3	0.5	0.1	2.3	0.4
6077000500	51.15	89.92	85-90%	2749 San Joaquin	19.5	74.6	5.9	73.8	11.3	7.3	1.1	5.1	1.5
6037201501	51.12	89.91	85-90%	5306 Los Angeles	14.4	75	10.6	85.4	4	0.7	0.3	9	0.6
6065040501	51.11	89.90	85-90%	6878 Riverside	16.7	76.2	7.1	68.3	27.3	1.4	0.2	1.6	1.1
6067007413	51.10	89.89	85-90%	5932 Sacramento	16.7	72.5	10.8	25.6	52.2	11	1.1	5.6	4.5
6099002504	51.10	89.87	85-90%	4422 Stanislaus	15.4	77.6	7	59	29.6	2.7	0.8	4.9	2.9
6019003202	51.10	89.86	85-90%	5265 Fresno	20.4	71.7	7.9	52	20.2	9.1	0.5	16.2	2.1
6071007305	51.09	89.85	85-90%	4060 San Bernardino	16.3	74.2	9.5	33.8	26.4	9.5	0.3	26.6	3.4
6037224200	51.09	89.83	85-90%	2392 Los Angeles	14.3	77.1	8.6	94.1	1.8	1.7	0	1.9	0.4
6037228320	51.08	89.82	85-90%	3219 Los Angeles	19.8	76.2	4	89.2	0.3	10	0.1	0	0.3
6107000900	51.07	89.81	85-90%	8171 Tulare	16.5	76.4	7.1	71.1	23.5	1.7	0.6	1.6	1.4
6037573002	51.06	89.80	85-90%	3990 Los Angeles	20.6	76.1	3.3	71.4	3.3	16.6	0.4	7	1.3
6037294610	51.01	89.78	85-90%	4065 Los Angeles	17.1	73.3	9.6	92.3	4.1	1.1	0.2	1.6	0.6
6037311802	50.99	89.77	85-90%	3813 Los Angeles	10.9	82.8	6.3	48.7	31	4.5	0.6	12.4	2.9
6067001101	50.98	89.76	85-90%	2047 Sacramento	3.1	88.5	8.4	16.1	61.3	8.9	0.5	9.1	4.1
6075980600	50.95	89.75	85-90%	467 San Francisco	12.7	78.9	8.4	12.8	8.8	57	0	18.2	3.2
6029004102	50.93	89.73	85-90%	5451 Kern	23.6	70.7	5.7	89.5	9	0.5	0.6	0.1	0.4
6037402904	50.92	89.72	85-90%	3603 Los Angeles	15.4	76.7	7.9	86.8	7.7	1.9	0.4	2.3	0.9
6039000201	50.88	89.71	85-90%	9049 Madera	3.4	94	2.6	38.8	28.9	23.9	1.7	0.9	5.8
6037128400	50.87	89.70	85-90%	4114 Los Angeles	13	77.2	9.8	36.2	50.5	4.1	0.3	6.1	2.9
6073004000	50.87	89.68	85-90%	5160 San Diego	20	74.4	5.6	86.3	2.8	8.7	0.2	1.1	0.9
6059001304	50.86	89.67	85-90%	3803 Orange	16.5	70.4	13.1	75.7	19.5	0.9	0.1	2.8	1
6037531701	50.85	89.66	85-90%	5718 Los Angeles	17.6	74.7	7.7	97.8	1.5	0.1	0.2	0.1	0.2
6037542105	50.85	89.65	85-90%	5200 Los Angeles	20	74.9	5.1	80.6	1.1	16.9	0.2	0.4	0.7
6037408501	50.84	89.63	85-90%	3314 Los Angeles	13.9	75.2	10.9	77.2	6.4	0.8	0.1	14.3	1.2
6019003701	50.80	89.62	85-90%	3314 Fresno	17.7	73.5	8.8	62.8	22.9	5.8	0.7	6.1	1.8
6077005109	50.79	89.61	85-90%	4016 San Joaquin	16.2	71.8	12	46.3	45	2	1	2.5	3.2
6037600303	50.76	89.60	85-90%	3664 Los Angeles	18.6	75.8	5.6	50.1	0.7	46.6	0.1	0.5	2
6037210010	50.75	89.58	85-90%	3520 Los Angeles	15.3	73.1	11.6	81	2.5	3	0	12.9	0.7
6037232800	50.73	89.57	85-90%	3823 Los Angeles	17.5	77.7	4.8	80.5	0.7	17.1	0.3	0.4	1
6037601501	50.70	89.56	85-90%	3890 Los Angeles	18.5	76.6	4.9	89.9	1.9	6.5	0.1	1.1	0.4
6037122120	50.69	89.54	85-90%	5000 Los Angeles	16	76.3	7.7	86.1	7.3	0.7	0.2	4.9	0.8
6085512602	50.69	89.53	85-90%	2997 Santa Clara	14.9	74.6	10.5	55.5	37.5	0.2	0.5	4.5	1.8
6019001411	50.68	89.52	85-90%	5276 Fresno	20.4	74	5.6	41.8	27.6	7.1	0.4	20.9	2.4
6099002503	50.63	89.51	85-90%	4368 Stanislaus	18.6	74.2	7.2	57.9	34.2	1.6	0.9	3.3	2.1
6037192610	50.62	89.49	85-90%	4389 Los Angeles	12.7	79.8	7.5	74.1	8.1	2.4	0.3	13.6	1.6
6037433401	50.61	89.48	85-90%	3371 Los Angeles	17.5	75.1	7.4	74.4	2.3	0.1	0.1	22.7	0.4
6037600304	50.61	89.47	85-90%	3424 Los Angeles	19.7	75.7	4.6	58	1.5	38.8	0.1	0.2	1.4
6065042300	50.58	89.46	85-90%	6782 Riverside	16.9	75.5	7.6	64.1	25.7	4.9	0.3	3.3	1.7
6037601402	50.57	89.44	85-90%	5059 Los Angeles	13.8	78.9	7.3	88.2	4.2	5.3	0.2	1.5	0.7
6037575102	50.56	89.43	85-90%	4510 Los Angeles	18.1	77.1	4.8	58.5	5.8	9.5	0.3	24	2
6065042510	50.56	89.42	85-90%	5048 Riverside	17.3	77.5	5.2	65.8	12.6	14.3	0.2	5.5	1.5
6111002905	50.56	89.41	85-90%	5478 Ventura	12.3	76.3	11.4	55.5	25.1	5.4	0.3	11.3	2.5
6037191500	50.55	89.39	85-90%	5551 Los Angeles	13	77.8	9.2	60.7	17	1.4	0.2	19	1.7
6099000301	50.55	89.38	85-90%	1987 Stanislaus	15.4	70.1	14.5	60.9	35.4	0.7	1.1	0.6	1.4
6047002302	50.53	89.37	85-90%	13709 Merced	18.7	73.9	7.4	66.5	23.3	3.7	0.4	3.9	2.2
6037123103	50.52	89.36	85-90%	4165 Los Angeles	14.8	77.9	7.3	62.1	25.4	2.8	0.1	7.4	2.3
6037405201	50.50	89.34	85-90%	5205 Los Angeles	14.9	77.5	7.6	80.1	6.6	1.3	0.1	11.3	0.7
6037232200	50.49	89.33	85-90%	3119 Los Angeles	15	76.9	8.1	62	1.4	34.9	0.1	0.2	1.4
6107004300	50.48	89.32	85-90%	7682 Tulare	22.5	72.1	5.4	89.2	6.4	0.6	0.2	3.3	0.4
6037408630	50.47	89.31	85-90%	2319 Los Angeles	14.7	75.5	9.8	73.3	9.1	0.4	0.6	15.1	1.5
6067000600	50.46	89.29	85-90%	1122 Sacramento	6.4	85	8.6	24.9	48.3	16.4	1.1	3.7	5.6
6065040502	50.46	89.28	85-90%	6202 Riverside	18.7	75.6	5.7	76.9	17.6	2.4	0.4	1.5	1.2
6037123510	50.45	89.27	85-90%	4753 Los Angeles	13	74.1	12.9	49.9	37.1	2.8	0.1	7.8	2.2
6037553502	50.44	89.25	85-90%	4183 Los Angeles	15.9	76.1	8	76.4	5.7	12.5	0.1	2.8	2.4
6037530101	50.44	89.24	85-90%	5400 Los Angeles	13.9	72	14.1	85.5	9.1	0.6	0.1	3.8	0.9
6067005001	50.44	89.23	85-90%	8107 Sacramento	16	72.3	11.7	30.4	17.9	15.6	0.6	32	3.5
6037532002	50.39	89.22	85-90%	3151 Los Angeles	16.2	72.1	11.7	91.3	5	0.2	0.1	3.1	0.4
6075023200	50.36	89.20	85-90%	4582 San Francisco	13.4	76.5	10.1	38.8	4.5	38.9	0.3	14.8	2.6
6019005100	50.34	89.19	85-90%	5723 Fresno	16.8	72.4	10.8	47.8	28.2	10.5	0.8	10	2.7
6037221810	50.33	89.18	85-90%	2773 Los Angeles	9.4	82.3	8.3	51.1	18.4	8.3	0.2	18.8	3.2

6037601211	50.32	89.17	85-90%	2823 Los Angeles	12.6	73.7	13.7	42.4	3	50.2	0.1	2.2	2.2
6037123420	50.30	89.15	85-90%	4638 Los Angeles	15	76.9	8.1	56.9	32.8	2	0.2	6.2	1.9
6037433601	50.29	89.14	85-90%	4923 Los Angeles	11.7	73.9	14.4	31.5	4	0.3	0.1	63.6	0.5
6001406000	50.28	89.13	85-90%	3450 Alameda	9.4	76.8	13.8	21.3	16.7	12.1	0.3	46.8	2.8
6059086702	50.28	89.12	85-90%	7094 Orange	17.2	77.7	5.1	67	14.7	4.3	0.1	12.2	1.8
6025011300	50.27	89.10	85-90%	10460 Imperial	17.9	74.2	7.9	92.9	5.6	0.5	0.2	0.6	0.3
6037203200	50.27	89.09	85-90%	4844 Los Angeles	18.8	73.7	7.5	97	1.1	0.4	0.1	0.9	0.5
6037104404	50.26	89.08	85-90%	3236 Los Angeles	16.6	76	7.4	96.2	1.8	1	0.2	0.5	0.4
6047002402	50.24	89.07	85-90%	7505 Merced	16.7	73.3	10	65.3	27.4	4.6	0.4	1	1.3
6071002704	50.24	89.05	85-90%	10787 San Bernardino	16.5	78.1	5.4	45	20.3	16.4	0.2	15.1	3
6031001601	50.24	89.04	85-90%	4516 Kings	20.3	72.5	7.2	75.2	14.2	0.6	7.9	0.8	1.2
6013382000	50.24	89.03	85-90%	6964 Contra Costa	15.6	73.1	11.3	25.4	8.8	53.2	0.3	8.7	3.6
6059074405	50.23	89.02	85-90%	5820 Orange	22.3	74	3.7	90.9	5.9	0.6	0.1	2.1	0.5
6029000200	50.22	89.00	85-90%	7644 Kern	16.4	75.7	7.9	21.6	73.1	0.4	1.5	0.4	3
6037185310	50.22	88.99	85-90%	3061 Los Angeles	15.1	75.1	9.8	90	3	0.5	0.3	5.9	0.4
6065030501	50.18	88.98	85-90%	5095 Riverside	16.9	74.3	8.8	63.4	10.5	16	0.5	7.5	2.1
6037218900	50.16	88.96	85-90%	5464 Los Angeles	15.1	76.9	8	50	5.1	39.2	0.2	3	2.5
6067004802	50.15	88.95	85-90%	4485 Sacramento	17.1	73	9.9	34.6	21.6	15	0.7	24.7	3.4
6037542800	50.13	88.94	85-90%	3123 Los Angeles	14	74.3	11.7	40.7	0.7	55.7	0.2	0.3	2.3
6077001600	50.09	88.93	85-90%	2383 San Joaquin	22.6	70.1	7.3	73	17.6	2	1.1	3.9	2.3
6037207302	50.09	88.91	85-90%	3791 Los Angeles	1.6	91.6	6.8	18.4	47.4	19	1	9.2	5
6037237402	50.08	88.90	85-90%	3526 Los Angeles	13.3	75	11.7	59.8	0.6	38.5	0.2	0	0.9
6037501400	50.07	88.89	85-90%	3978 Los Angeles	15.8	77.6	6.6	84.4	12.1	0.9	0.5	1.6	0.6
6037502601	50.05	88.88	85-90%	7145 Los Angeles	13	75.5	11.5	91.3	6.2	0.4	0.1	1.5	0.5
6085500100	50.03	88.86	85-90%	6339 Santa Clara	14.8	77.5	7.7	57.9	16.9	2.1	0.4	20.6	2.2
6071006204	50.03	88.85	85-90%	4495 San Bernardino	23.4	70.9	5.7	53.5	16.8	24.4	0.2	1.8	3.2
6037432500	50.03	88.84	85-90%	8210 Los Angeles	12.5	74.2	13.3	55.6	12.4	0.8	0.1	30.5	0.7
6065042511	50.03	88.83	85-90%	3308 Riverside	18.6	75.5	5.9	64.4	14.3	15.8	0.2	3.2	2.2
6037573100	49.99	88.81	85-90%	7165 Los Angeles	15.7	77.4	6.9	48.1	10.5	22.6	0.4	16	2.4
6077005302	49.99	88.80	85-90%	6507 San Joaquin	16.3	72.9	10.8	51.4	36.6	4.6	0.5	4.1	2.8
6077003113	49.95	88.79	85-90%	6256 San Joaquin	16.6	75.3	8.1	35.6	25.3	15.4	0.5	18.9	4.2
6099001604	49.95	88.78	85-90%	3861 Stanislaus	22.5	71.9	5.6	73.3	10.3	4.9	0.2	8.5	2.8
6037238320	49.94	88.76	85-90%	3787 Los Angeles	20.3	74.2	5.5	67.4	1.2	29.3	0.2	0.1	1.8
6071001305	49.94	88.75	85-90%	5348 San Bernardino	20	74	6	83.1	10.8	2.5	0.4	2.8	0.5
6019005408	49.92	88.74	85-90%	1276 Fresno	2.1	97.6	0.3	21.9	58.6	8.3	0.4	7.4	3.4
6037576401	49.89	88.72	85-90%	4779 Los Angeles	18.2	77.2	4.6	67.7	5.9	10.7	0.2	13.9	1.7
6037407801	49.89	88.71	85-90%	5074 Los Angeles	13.8	76.1	10.1	76.9	6.1	1.4	0.3	14.6	0.7
6037543905	49.87	88.70	85-90%	4510 Los Angeles	16	76.6	7.4	76.3	3.4	9.7	0.2	9.3	1.2
6067004602	49.86	88.69	85-90%	5067 Sacramento	19.4	72.8	7.8	54.1	20.5	10.7	0.6	10.9	3.2
6013368002	49.85	88.67	85-90%	3404 Contra Costa	18.3	76.6	5.1	70.6	8.1	8.2	0.1	10.3	2.8
6019003702	49.83	88.66	85-90%	4933 Fresno	18.8	70.9	10.3	52	23.8	7.3	0.6	14.4	1.8
6099004000	49.82	88.65	85-90%	3822 Stanislaus	14.2	71.5	14.3	29.4	65.1	0.9	0.3	2.5	1.9
6037543501	49.82	88.64	85-90%	6805 Los Angeles	11	74.3	14.7	32.3	9.2	7.9	0.2	47.5	2.9
6065040203	49.75	88.62	85-90%	3626 Riverside	21.3	73.8	4.9	85.9	10	2.3	0.1	1.1	0.6
6065042512	49.74	88.61	85-90%	3200 Riverside	20.9	74.8	4.3	70.6	9.8	13.7	0.2	3.3	2.5
6059086601	49.72	88.60	85-90%	9584 Orange	20.3	73.9	5.8	82.6	8.2	2.2	0.1	5.6	1.3
6019007003	49.72	88.59	85-90%	7750 Fresno	16.5	73.8	9.7	74.7	16.6	0.6	0.4	6.4	1.3
6037238310	49.71	88.57	85-90%	4821 Los Angeles	22.2	74.1	3.7	70.8	1	26.7	0.2	0.2	1.1
6071001002	49.69	88.56	85-90%	5530 San Bernardino	19.6	75.7	4.7	84.5	9.9	3.2	0.1	1.5	0.8
6073003502	49.67	88.55	85-90%	4946 San Diego	19.1	74	6.9	84	2.1	11.8	0.2	0.6	1.3
6037534804	49.67	88.54	85-90%	3878 Los Angeles	16.5	76.6	6.9	98.2	1	0.1	0.2	0.2	0.4
6037501803	49.67	88.52	85-90%	4705 Los Angeles	17.4	76.9	5.7	86.5	9.9	1	0.5	1.1	1
6065042506	49.65	88.51	85-90%	9483 Riverside	19.3	76.7	4	50	14	21.3	0.3	10.8	3.6
6029003112	49.64	88.50	85-90%	5116 Kern	17.8	73.1	9.1	47.4	32.5	10.7	0.5	5.9	3
6071000207	49.63	88.49	85-90%	4635 San Bernardino	15	76.8	8.2	76.2	13	3.4	0.3	6.4	0.8
6037540800	49.61	88.47	85-90%	5042 Los Angeles	14.6	74.6	10.8	41	0.6	56.3	0.2	0.3	1.6
6037570100	49.59	88.46	85-90%	2837 Los Angeles	10.9	77.1	12	31.4	24.3	20.1	0.1	21.1	2.9
6077002702	49.56	88.45	85-90%	4239 San Joaquin	19.3	73.9	6.8	72.2	21.1	0.9	0.7	2.8	2.3
6107000201	49.56	88.43	85-90%	9406 Tulare	20.4	72.4	7.2	87.3	3.4	0.1	0.2	8.3	0.7
6047001003	49.56	88.42	85-90%	4061 Merced	20.3	72.4	7.3	49.1	22.6	11.9	0.2	12.8	3.4
6037208301	49.55	88.41	85-90%	2201 Los Angeles	17.4	80.2	2.4	94.7	1.8	0.3	0.4	2.6	0.2
6019004703	49.54	88.40	85-90%	4218 Fresno	18.2	71.3	10.5	60.2	23.7	7.8	0.7	5.7	1.8
6037531604	49.53	88.38	85-90%	3580 Los Angeles	16.5	74.6	8.9	97.8	1.8	0.1	0.1	0	0.1
6037191710	49.51	88.37	85-90%	3231 Los Angeles	11	79.1	9.9	67.1	19.1	2.5	0	9.8	1.5
6099000909	49.51	88.36	85-90%	4402 Stanislaus	13.8	69.7	16.5	26.7	62.2	3.1	0.8	4	3.2
6037533803	49.48	88.35	85-90%	6309 Los Angeles	17.7	74.4	7.9	89.3	7.3	0.4	0.2	2.1	0.7
6037576402	49.47	88.33	85-90%	5181 Los Angeles	19.3	76.5	4.2	67.1	5.9	10	0.1	15.6	1.3
6001402200	49.46	88.32	85-90%	2385 Alameda	13.1	78.2	8.7	30.2	16.3	36.4	0.3	11.4	5.4
6073012502	49.43	88.31	85-90%	4466 San Diego	16.1	77.6	6.3	78.7	9.6	4.5	0.3	5.2	1.7
6037552602	49.42	88.30	85-90%	4191 Los Angeles	13.7	74.9	11.4	49.9	8.9	5.4	0.1	33.7	1.8
6037213310	49.41	88.28	85-90%	3477 Los Angeles	13.6	78.3	8.1	67.1	1.5	1.2	0	29.7	0.5
6065041002	49.41	88.27	85-90%	3312 Riverside	17	76.9	6.1	73.1	19.5	2.8	0.3	2.6	1.7
6037570304	49.41	88.26	85-90%	5171 Los Angeles	19.8	75.8	4.4	63.4	7.3	18.4	0.3	8.4	2.3
6037551101	49.41	88.25	85-90%	3926 Los Angeles	16.8	77.7	5.5	76.1	10.7	5.3	0.2	6.5	1.2
6037432202	49.40	88.23	85-90%	4252 Los Angeles	10.5	75.4	14.1	33.5	8.6	0.6	0.2	56	1.2
6037236202	49.40	88.22	85-90%	6192 Los Angeles	17.9	75.6	6.5	47.4	1.1	48.4	0.2	0.4	2.4
6037404901	49.40	88.21	85-90%	5658 Los Angeles	15.3	76.6	8.1	80.7	3.1	0.6	0.1	15.1	0.4
6037237500	49.38	88.20	85-90%	2675 Los Angeles	17.1	76.4	6.5	74.2	1.2	23.3	0.2	0	1.1
6065031401	49.38	88.18	85-90%	6702 Riverside	16.2	76.2	7.6	53.7	35.2	6.4	0.5	1.7	2.6
6037232600	49.36	88.17	85-90%	6288 Los Angeles	14.6	77.4	8	69.5	0.6	27.7	0.1	0.1	2
6071001312	49.35	88.16	85-90%	4645 San Bernardino	15	77.5	7.5	54.8	21.4	11.2	0.2	10.7	1.8
6037573004	49.35	88.14	85-90%	5153 Los Angeles	20.2	75.9	3.9	61.8	8.3	21.5	0.3	6.3	1.9
6037402600	49.32	88.13	85-90%	7453 Los Angeles	16.2	74.6	9.2	66.6	21.4	5.2	0.3	4.9	1.5
6037433307	49.31	88.12	85-90%	3421 Los Angeles	17.1	76.6	6.3	65.4	3	0.3	0.1	30.2	0.9
6099002602	49.29	88.11	85-90%	4561 Stanislaus	18.6	73.4	8	53.6	37.4	3.4	0.5	2.6	2.5
6065042515	49.27	88.09	85-90%	3803 Riverside	23.9	71.1	5	70.8	9.3	15.4	0.6	2.5	1.5
6077001300	49.26	88.08	85-90%	4903 San Joaquin	14.4	72	13.6	44.2	41.4	5.3	1.3	3.8	4.1
6037104704	49.25	88.07	85-90%	4219 Los Angeles	18.1	75.8	6.1	76.7	5.5	13.1	0.2	3.7	0.7
6019003900	49.25	88.06	85-90%	5804 Fresno	18.7	71.8	9.5	69.1	28.1	0.3	0.4	1.5	0.7
6077004404	49.24	88.04	85-90%	3670 San Joaquin	21.2	73.5	5.3	69.2	16.9	0.6	0.2	11.5	1.7
6037224410	49.23	88.03	85-90%	3140 Los Angeles	9	83.5	7.5	58.3	12.4	4.1	0	23.6	1.5
6001409400	49.22	88.02	85-90%	4306 Alameda	18.9	75.6	5.5	67.1	2.3	23.4	0.1	5.7	1.4
6037128210	49.18	88.01	85-90%	4822 Los Angeles	16.9	79.2	3.9	79.1	11.1	4.4	0.2	3.8	1.4
6037533203	49.17	87.99	85-90%	1827 Los Angeles	19	75.6	5.4	93.5	2.5	0.1	0.2	2.8	0.8
6037191610	49.13	87.98	85-90%	4502 Los Angeles	13.3	80.5	6.2	75.1	10.5	1.5	0	11.4	1.4
6099003603	49.13	87.97	85-90%	3952 Stanislaus	16.1	72.3	11.6	41.6	55.4	0.1	0.3	0.8	1.8
6037405202	49.11	87.96	85-90%	5227 Los Angeles	17.5	73.7	8.8	81.4	4.3	0.6	0	12.9	0.7
6075017902	49.09	87.94	85-90%	2880 San Francisco	9.4	89.6	1	23	27.2	23.5	0.6	18.8	7
6047002202	49.08	87.93	85-90%	9923 Merced	18.9	74.3	6.8	69.3	23.8	2.9	0.4	2.1	1.5
6025011900	49.08	87.92	85-90%	10966 Imperial	17.9	72.4	9.7	96.6	2.2	0.1	0	0.9	0.2
6037433402	49.07	87.91	85-90%	4776 Los Angeles	18.2	75.5	6.3	77.8	2.2	0.1	0	19.5	0.5
6037234901	49.07	87.89	85-90%	2999 Los Angeles	16.3	74.6	9.1	45.3	0.7	51.8	0	0.4	1.7
6037533503	49.05	87.88	85-90%	1920 Los Angeles	16.4	76.8	6.8	97.6	1.7	0.1	0.3	0.2	0.3
6037554403	49.00	87.87	85-90%	5483 Los Angeles	17.3	76.4	6.3	49.5	13.6	22	0.3	12.2	2.4
6037219700	48.99	87.85	85-90%	4306 Los Angeles	12.6	78.8	8.6	63.7	3.1	29.7	0.5	1.2	1.8
6037237710	48.98	87.84	85-90%	3887 Los Angeles	19.4	76	4.6	72.1	1	25.2	0.3	0.5	0.9
6037209300	48.97	87.83	85-90%	5021 Los Angeles	13	83.4	3.6	67.4	14.1	6.4	0.4	10	1.7
6071003609	48.94	87.82	85-90%	4871 San Bernardino	18.4	74.5	7.1	74.4	12.7	9.2	0.2	1.6	1.8
6067004701	48.89	87.80	85-90%	3303 Sacramento	19.8	69.6	10.6	40.2	15.5	18.1	0.6	21.6	4
6065030101	48.89	87.79	85-90%	1226 Riverside	17.2	78.2	4.6	66.4	16	5.3	0.1	10.8	1.4
6037572600	48.88	87.78	85-90%	5370 Los Angeles	13.1	76.2	10.7	45.2	4.4	10.9	0.1	36.9	2.5
6037127803	48.88	87.77	85-90%	4037 Los Angeles	15	72.4	12.6	65.2	21.2	3.6	0.1	7.8	2.1
6037603702	48.86	87.75	85-90%	5087 Los Angeles	12.6	73.8	13.6	33	34.6	5.1	0.2	23.5	3.5
6013376000	48.86	87.74	85-90%	5962 Contra Costa	17.9	75	7.1	56	3.3	31.6	0.2	6.8	2.1
6037530301	48.85	87.73	85-90%	2168 Los Angeles	13.9	74.8	11.3	97	1.8	0	0	1	0.2
6037552301	48.84	87.72	85-90%	4900 Los Angeles	13.4	77.9	8.7	65	11.1	6.7	0.4	15.3	1.6
6037109500	48.84	87.70	85-90%	4303 Los Angeles	15.2	74.9	9.9	92.6	3.1	0.9	0.1	2.4	0.8
6037603200	48.83	87.69	85-90%	2777 Los Angeles	9	69.1	21.9	27.2	14.9	8	0.3	46.9	2.8
6037104701	48.83	87.68	85-90%	4208 Los Angeles	21.2	73.3	5.5	95.5	0.9	2.9	0.1	0.3	0.5
6037232300	48.81	87.67	85-90%	3926 Los Angeles	14.6	75.8	9.6	64.5	0.7	33	0.2	0.2	1.4
6065042800	48.80	87.65	85-90%	9260 Riverside	22.9	72	5.1	77	8.8	10.6	0.4	1.6	1.6
6037500403	48.80	87.64	85-90%	4023 Los Angeles	13.1	72.6	14.3	89.4	5.1	0.5	0.2	4.4	0.3
6071003505	48.78	87.63	85-90%	5969 San Bernardino	22.7	74.1	3.2	73.8	6	16.9	0.1	2.1	1

6059087803	48.78	87.62	85-90%	5658 Orange	18.5	74.9	6.6	67.6	8.2	2.5	0.1	20.4	1.2
6065041703	48.73	87.60	85-90%	5695 Riverside	20.3	73.4	6.3	78.6	12.1	4.1	0.2	3.8	1.3
6031001300	48.73	87.59	85-90%	3761 Kings	21.8	70.5	7.7	79.6	12.2	5.7	0.6	0.8	1.2
6071009300	48.72	87.58	85-90%	1257 San Bernardino	13.8	72.3	13.9	40.3	49.7	3.8	0.6	2.5	3
6073016202	48.71	87.56	85-90%	3337 San Diego	14.9	80.6	4.5	33.5	42.5	13.1	0.6	6	4.4
6037224700	48.70	87.55	85-90%	4856 Los Angeles	1.3	97.5	1.2	13.3	55	4.9	0.1	22.5	4.2
6073021900	48.70	87.54	85-90%	6816 San Diego	4.3	93.2	2.5	36.8	37.4	13	0.8	8.7	3.3
6037208801	48.69	87.53	85-90%	2995 Los Angeles	12.5	72.6	14.9	59.9	6.8	5.8	0.1	26.4	0.9
6037208502	48.68	87.51	85-90%	3571 Los Angeles	13.3	78.2	8.5	72.1	5.2	3.3	0	18.1	1.3
6037433802	48.67	87.50	85-90%	2780 Los Angeles	13	73.4	13.6	81.9	4.5	0.1	0.1	12.8	0.7
6037433602	48.66	87.49	85-90%	2803 Los Angeles	11.7	72.6	15.7	36.7	4.2	0.1	0	58.3	0.6
6037552100	48.66	87.48	85-90%	5891 Los Angeles	12.8	68.2	19	64.9	13.9	3.2	0.2	16.7	1.1
6019002200	48.64	87.46	85-90%	3594 Fresno	13.4	78.7	7.9	51.3	38.8	4.2	1.2	2.3	2.3
6067000500	48.64	87.45	85-90%	3159 Sacramento	6.2	87.6	6.2	26.8	56.5	5.2	1.4	5.8	4.3
6067009201	48.64	87.44	85-90%	2293 Sacramento	12	69.2	18.8	19.8	51.3	6.9	1.4	16.5	4.1
6037104821	48.63	87.43	85-90%	3514 Los Angeles	17.1	76.7	6.2	93	3.4	1.1	0.2	1.8	0.5
6029004500	48.63	87.41	85-90%	3937 Kern	24.6	71.8	3.6	93.3	5.5	0.1	0.1	0.9	0.1
6037405002	48.61	87.40	85-90%	3197 Los Angeles	16.1	77.6	6.3	88.5	3.6	0.3	0	7	0.6
6029003202	48.59	87.39	85-90%	15579 Kern	19.8	74.8	5.4	71.1	17.4	4.2	0.5	5.1	1.7
6037213202	48.58	87.38	85-90%	3873 Los Angeles	13.6	77.8	8.6	63.4	1.6	3.6	0.1	30.7	0.7
6037576200	48.56	87.36	85-90%	6158 Los Angeles	11.8	80.2	8	46.5	24.4	19.8	0.7	5.7	2.9
6037221500	48.53	87.35	85-90%	3507 Los Angeles	14.2	75.7	10.1	68.2	1.8	22.4	0.2	4	3.5
6037402502	48.52	87.34	85-90%	7225 Los Angeles	18.5	73.5	8	80.6	3.8	3.4	0.3	10.9	1
6085504318	48.52	87.33	85-90%	5265 Santa Clara	13.7	79	7.3	25.4	17.7	2.6	0.3	52.2	1.8
6037534404	48.52	87.31	85-90%	3647 Los Angeles	18.4	75.9	5.7	94	3.1	1.2	0.3	0.7	0.6
6013310000	48.52	87.30	85-90%	5641 Contra Costa	18.4	75.9	5.7	53.7	14.2	17.9	0.4	9.7	4.1
6037236203	48.48	87.29	85-90%	3417 Los Angeles	16.1	75.1	8.8	28.2	0.9	66.7	0.3	1.2	2.7
6067005502	48.48	87.27	85-90%	5477 Sacramento	17.6	75	7.4	48.7	29.2	10.4	1	6.7	4
6037191820	48.47	87.26	85-90%	2647 Los Angeles	9	83.4	7.6	52.8	29.8	4.2	0.2	10.4	2.7
6037408140	48.47	87.25	85-90%	3835 Los Angeles	15.4	77.3	7.3	90	3.2	0.7	0.1	5.4	0.5
6019004802	48.47	87.24	85-90%	4599 Fresno	20.5	71	8.5	57.5	23.2	12.9	1.1	3.3	1.9
6037553901	48.47	87.22	85-90%	6896 Los Angeles	14.1	78.3	7.6	78.4	7.9	7	0.2	5.5	1
6067002100	48.47	87.21	85-90%	2377 Sacramento	9.9	80.9	9.2	24.9	35.4	4.7	0.8	28.6	5.7
6037552200	48.46	87.20	85-90%	6835 Los Angeles	18.9	75.8	5.3	78.8	7.1	5.2	0.4	7.6	1
6025010400	48.43	87.19	85-90%	7162 Imperial	20.1	70.9	9	94.1	3.6	1.4	0.2	0.2	0.5
6019003500	48.41	87.17	85-90%	5674 Fresno	14.9	77.5	7.6	51.3	33.3	5.7	0.8	5.7	3.1
6037535501	48.41	87.16	85-90%	3866 Los Angeles	19.7	74.4	5.9	96.7	1.9	0.8	0.1	0.4	0.1
6037231220	48.41	87.15	85-90%	3824 Los Angeles	16.5	76.1	7.4	72.7	1.3	21.6	0.4	2.7	1.4
6037543802	48.39	87.14	85-90%	7126 Los Angeles	11.8	73.2	15	33.1	7.2	8.2	0.1	48.5	2.9
6037237401	48.37	87.12	85-90%	3616 Los Angeles	14.4	77.7	7.9	65.4	0.9	32.4	0	0.2	1
6071001702	48.35	87.11	85-90%	4827 San Bernardino	14.1	75.1	10.8	57.1	30.4	5.5	0.3	5.2	1.4
6037572700	48.35	87.10	85-90%	5499 Los Angeles	13.4	74.3	12.3	37.8	3.7	9.4	0.2	45.6	3.2
6037407302	48.34	87.09	85-90%	3501 Los Angeles	13.5	75.6	10.9	89.7	4.3	0.8	0.2	4.7	0.3
6037121221	48.34	87.07	85-90%	2365 Los Angeles	13.4	77.7	8.9	83.3	7.7	1.2	0.2	6.3	1.4
6107000502	48.32	87.06	85-90%	3405 Tulare	19.9	71.4	8.7	87.1	10.3	0.1	0.2	1.6	0.7
6071001706	48.32	87.05	85-90%	6231 San Bernardino	17.8	77.3	4.9	74.8	11.7	7.2	0.1	4.3	1.9
6107000401	48.30	87.03	85-90%	5193 Tulare	19.5	73.6	6.9	81.3	13.7	0.2	0.3	3.4	1
6065040503	48.29	87.02	85-90%	3876 Riverside	9.5	65.7	24.8	51.1	33.2	10.5	0.3	3.2	1.8
6071003102	48.29	87.01	85-90%	5466 San Bernardino	22.2	74.1	3.7	86.8	7.3	3.4	0.2	2	0.4
6013311000	48.28	87.00	85-90%	5001 Contra Costa	17.3	75.4	7.3	52.4	11.4	18.4	0.7	13.7	3.5
6047001901	48.26	86.98	85-90%	5739 Merced	18.4	72.8	8.8	88.7	9.3	0.4	0.1	1.3	0.3
6047001700	48.25	86.97	85-90%	6335 Merced	21.1	70.3	8.6	52.7	30.3	4.5	0.5	9.4	2.4
6075023400	48.25	86.96	85-90%	3660 San Francisco	16.2	74.2	9.6	33.5	3.5	33	0.2	25.2	4.8
6065041408	48.21	86.95	85-90%	4017 Riverside	18.1	76.8	5.1	51.5	27.8	10.8	0.5	5.3	4.2
6059011602	48.19	86.93	85-90%	5237 Orange	15.5	72.7	11.8	78.9	14.8	1.7	0.1	3.8	0.7
6019008200	48.18	86.92	85-90%	6978 Fresno	22.1	72	5.9	91.3	7.1	0.1	0.2	0.9	0.4
6071004301	48.17	86.91	85-90%	4677 San Bernardino	17	73.3	9.7	68	6.5	21.9	0.2	2.3	1.2
6037221302	48.15	86.90	85-90%	4403 Los Angeles	14.3	78.8	6.9	67	4.8	18.4	0.2	8.1	1.6
6095250701	48.15	86.88	85-90%	2962 Solano	14.4	73.8	11.8	35.9	19.3	30.3	0.7	10.4	3.4
6037120400	48.14	86.87	85-90%	6272 Los Angeles	13	76.3	10.7	56.7	17.7	2.8	0.2	20.6	2
6067002000	48.12	86.86	85-90%	2376 Sacramento	5.5	81.2	13.3	16.8	39.1	3.4	1.2	34.8	4.7
6029004301	48.12	86.85	85-90%	7416 Kern	22.2	72.9	4.9	84.7	11.4	2.3	0.2	0.7	0.7
6081611900	48.11	86.83	85-90%	10325 San Mateo	17.1	75.8	7.1	56.9	6.8	19.8	0.1	13.3	3.1
6037302201	48.11	86.82	85-90%	3856 Los Angeles	7.2	69.7	23.1	14.5	68.8	1	0	12	3.7
6037408202	48.10	86.81	85-90%	2037 Los Angeles	15.6	76.3	8.1	86.3	5.4	0.2	0.2	7.1	0.7
6037234700	48.10	86.80	85-90%	3888 Los Angeles	12.9	74.6	12.5	38.3	1.1	57.6	0.4	0.6	2
6037533502	48.10	86.78	85-90%	2143 Los Angeles	16.5	78	5.5	98.4	1.1	0.2	0.1	0.2	0
6025011100	48.09	86.77	85-90%	3685 Imperial	15.8	72.6	11.6	66.7	27.1	2.3	0.1	1.6	2.1
6037530302	48.05	86.76	85-90%	6556 Los Angeles	14.8	74.5	10.7	96.3	2.1	0.1	0.1	1.1	0.3
6037191410	48.04	86.74	85-90%	5092 Los Angeles	12.5	77.1	10.4	73.1	6	3.6	0.1	15.8	1.4
6037121600	48.03	86.73	85-90%	3005 Los Angeles	10	75.3	14.7	36.1	36.8	1.8	0.1	22.4	2.8
6071006302	48.01	86.72	85-90%	8815 San Bernardino	20	73.2	6.8	68.4	15.7	9.7	0.4	4	1.8
6073004700	47.99	86.71	85-90%	1858 San Diego	11.9	78.8	9.3	70.5	19.5	6.2	0.4	1.3	2.2
6037603400	47.98	86.69	85-90%	4367 Los Angeles	13.1	73	13.9	42.9	12.6	13.7	0.1	27.8	2.9
6001408900	47.97	86.68	85-90%	3414 Alameda	18.1	72.8	9.1	59.4	2	31.9	0.4	4.2	2.1
6037504101	47.96	86.67	85-90%	5126 Los Angeles	12.2	74.4	13.4	67.9	19.8	1.5	0.3	9.3	1.2
6025012100	47.95	86.66	85-90%	6937 Imperial	14.3	68.6	17.1	96.6	2.1	0.2	0.2	0.7	0.2
6037551900	47.95	86.64	85-90%	5344 Los Angeles	13.1	75.8	11.1	65.8	16.2	6.6	0.3	10.1	1.1
6059110606	47.90	86.63	85-90%	4590 Orange	17.8	77.2	5	59	10.7	4.3	0.1	24.2	1.8
6019007500	47.90	86.62	85-90%	5287 Fresno	16.9	73.1	10	62.9	27.6	0.3	0.2	7.6	1.4
6037213401	47.87	86.61	85-90%	4951 Los Angeles	14	80	6	76.7	1.6	1	0.1	19.9	0.7
6037603900	47.83	86.59	85-90%	7527 Los Angeles	14.6	76.8	8.6	61.9	17.4	8	0.4	9.9	2.4
6037238000	47.82	86.58	85-90%	5864 Los Angeles	12.8	72.1	15.1	19.9	0.7	76.7	0.2	0.4	2
6037532200	47.82	86.57	85-90%	6836 Los Angeles	18.4	74.5	7.1	92.7	3.8	1.7	0.1	1.4	0.2
6115040400	47.81	86.56	85-90%	5538 Yuba	19.6	72.7	7.7	34.7	45.3	2.6	2.6	10.3	4.5
6019006604	47.79	86.54	85-90%	7959 Fresno	19.6	74.5	5.9	88.5	8.3	0.2	0.1	2.3	0.7
6037241110	47.77	86.53	85-90%	3074 Los Angeles	19.5	75.4	5.1	70.1	0.6	28.2	0	0.1	1
6037195804	47.77	86.52	85-90%	2643 Los Angeles	9.1	79.4	11.5	53.5	24	2.3	0.1	17.9	2.3
6077003313	47.76	86.51	85-90%	2926 San Joaquin	20.5	69.9	9.6	41	12.4	17.2	0.9	25.2	3.3
6029000101	47.74	86.49	85-90%	12240 Kern	17.8	74.6	7.6	19.1	74.2	0.8	1	2.7	2.2
6059074300	47.71	86.48	85-90%	4392 Orange	18.3	76	5.7	96	2.6	0.1	0.1	1	0.2
6037221304	47.69	86.47	85-90%	3319 Los Angeles	14.5	76.6	8.9	54.1	3.2	22.7	0.2	18.5	1.3
6037532101	47.66	86.45	85-90%	6663 Los Angeles	17.7	76.2	6.1	93.5	3.5	0.4	0.4	2	0.2
6037237600	47.66	86.44	85-90%	4259 Los Angeles	18.7	73.1	8.2	75.5	0.8	21.9	0.1	0.4	1.2
6039000800	47.65	86.43	85-90%	7027 Madera	20.7	71.7	7.6	81.2	14.1	2.2	0.7	0.8	1
6059089004	47.63	86.42	85-90%	7011 Orange	16.3	73.7	10	62.3	7.2	0.7	0.1	28.8	0.9
6073011602	47.62	86.40	85-90%	3228 San Diego	14.7	74.9	10.4	78.4	8.4	3.8	0.2	8	1.1
6065042513	47.62	86.39	85-90%	3379 Riverside	14.9	77.5	7.6	63.5	17.6	10.2	0.1	6.2	2.4
6037601302	47.60	86.38	85-90%	6856 Los Angeles	14.8	79.4	5.8	25.8	3.6	65.7	0.2	1.4	3.3
6071006700	47.60	86.37	85-90%	4486 San Bernardino	17.9	74.4	7.7	88.5	7.7	1.8	0.1	0.8	1.1
6037294421	47.60	86.35	85-90%	2950 Los Angeles	16.6	75.1	8.3	70.9	8.7	6.6	0.1	12	1.6
6077002504	47.59	86.34	85-90%	3982 San Joaquin	17.7	75.6	6.7	49.1	7.4	12.5	0.1	27.8	3.2
6037104610	47.59	86.33	85-90%	3672 Los Angeles	18.5	74.4	7.1	97.3	1.4	0.4	0.2	0.5	0.3
6037481500	47.58	86.32	85-90%	4361 Los Angeles	8.6	68.6	22.8	18.8	8.6	0.4	0	70.9	1.2
6037190401	47.57	86.30	85-90%	3135 Los Angeles	5.1	83.4	11.5	21.6	59.4	4.3	0.4	10.8	3.6
6037218702	47.57	86.29	85-90%	2176 Los Angeles	15	76.2	8.8	53.8	3.4	37.7	0.1	2.7	2.3
6037406702	47.56	86.28	85-90%	5823 Los Angeles	13.5	75.5	11	61.2	13.7	4	0.3	19.1	1.7
6019007300	47.54	86.27	85-90%	4869 Fresno	16.1	72.2	11.7	55.9	30	0.6	0.4	11.1	2.1
6001401800	47.54	86.25	85-90%	1703 Alameda	15.3	77.9	6.8	19.3	15	57.4	0.3	3.3	4.6
6037208903	47.53	86.24	85-90%	4019 Los Angeles	14.4	78.3	7.3	82.8	5.3	6.9	0.1	3.6	1.4
6029003121	47.52	86.23	85-90%	8264 Kern	20.3	72.6	7.1	65.5	17.1	11.4	0.4	3.5	2.1
6019007002	47.50	86.22	85-90%	4514 Fresno	16.9	73.3	9.8	80.7	16.3	0.4	0.8	0.9	0.9
6037294510	47.49	86.20	85-90%	4214 Los Angeles	17.8	76.5	5.7	92.9	3.8	1.1	0.1	1.5	0.5
6037222600	47.48	86.19	85-90%	5631 Los Angeles	12.5	81.2	6.3	54.5	7.7	24.1	0.1	10.6	3
6037127804	47.48	86.18	85-90%	3933 Los Angeles	13.2	79.3	7.5	50.9	28	6.8	0.3	11.5	2.4
6037270300	47.47	86.16	85-90%	2364 Los Angeles	11.3	75.5	13.2	34.9	14.9	38.2	0.3	7.4	4.1
6031000800	47.47	86.15	85-90%	4858 Kings	17.4	70.5	12.1	54.1	35.9	4.9	0.6	2.3	2.2
6037128601	47.46	86.14	85-90%	4288 Los Angeles	12.9	79.4	7.7	48.6	40.4	4.5	0.2	3.6	2.8
6073003602	47.45	86.13	85-90%	3079 San Diego	18.3	75.7	6	84.4	3.1	8.8	0.2	2.7	0.8
6065040402	47.45	86.11	85-90%	4224 Riverside	16.2	74.8	9	64.8	31.5	1	0.2	1	1.5
6071003200	47.45	86.10	85-90%	8005 San Bernardino	17.5	74.4	8.1	73.8	20.3	3.5	0.2	1.2	1
6071002502	47.44	86.09	85-90%	8051 San Bernardino	17.7	76	6.3	85.8	9	2.7	0.3	1.8	0.5
6077003405	47.44	86.08	85-90%	4214 San Joaquin	18.2	73	8.8	31	10.5	7.9	0.1	47.2	3.2

6037500402	47.44	86.06	85-90%	4910 Los Angeles	15.8	75.5	8.7	95.5	2.4	0.2	0.1	1.4	0.5
6029005003	47.43	86.05	85-90%	3543 Kern	21.2	70.2	8.6	80.6	6.7	0.8	0.3	10.5	1.1
6037542700	47.43	86.04	85-90%	5720 Los Angeles	17.7	76.2	6.1	72.2	0.7	26	0.1	0.4	0.5
6037127910	47.43	86.03	85-90%	4769 Los Angeles	14.7	77	8.3	67.1	20.2	5	0	5.3	2.4
6077004502	47.42	86.01	85-90%	4450 San Joaquin	24.2	71.1	4.7	79.5	13.4	0.3	0.6	4.9	1.4
6037203720	47.40	86.00	85-90%	4001 Los Angeles	18.1	74.3	7.6	96.7	1	0.7	0	1	0.6
6107003300	47.40	85.99	85-90%	7837 Tulare	19.4	71.2	9.4	66	30.9	0.3	0.6	1.1	1.2
6031001003	47.40	85.98	85-90%	5699 Kings	19.1	74.8	6.1	66.2	22.7	4.8	0.6	3.1	2.6
6037221601	47.38	85.96	85-90%	3403 Los Angeles	14.1	78.7	7.2	81.3	3.4	9.8	0.3	3.9	1.3
6085512603	47.37	85.95	85-90%	3954 Santa Clara	20.1	75.1	4.8	86.1	9.6	0.9	0.4	1.9	1
6019002904	47.37	85.94	85-90%	2897 Fresno	16.2	72.9	10.9	59.2	16.2	4.3	0.4	19.1	0.8
6037221820	47.37	85.93	85-90%	3095 Los Angeles	2.9	93.2	3.9	17.2	31	6.7	0	40.5	4.6
6037530400	47.36	85.91	85-90%	3683 Los Angeles	13.8	69.6	16.6	76.6	2.9	1.2	0.4	18.2	0.7
6037602403	47.36	85.90	85-90%	5230 Los Angeles	15.7	77.4	6.9	59.7	8.5	20.8	0.2	8.6	2.1
6099003300	47.34	85.89	85-90%	5077 Stanislaus	16.1	74.4	9.5	59.9	32.9	2.3	0.5	2.4	2
6037119001	47.33	85.87	85-90%	4038 Los Angeles	12.2	78.2	9.6	70.5	9.7	0.8	0.2	16.9	2
6037213320	47.33	85.86	85-90%	2481 Los Angeles	9.6	74.7	15.7	64	1.9	3.1	0	29.8	1.1
6071007109	47.32	85.85	85-90%	6064 San Bernardino	16	74.7	9.3	38.6	33.3	17.9	0.4	6.1	3.7
6037297120	47.32	85.84	85-90%	3315 Los Angeles	16.3	75.7	8	69.5	18.4	5.5	0.4	4.5	1.8
6107003100	47.32	85.82	85-90%	3591 Tulare	19.9	72.2	7.9	64.1	32.4	1.3	0.8	0.3	1.2
6001406100	47.31	85.81	85-90%	4381 Alameda	14.5	78.6	6.9	57.7	16.3	10.5	0.7	12.6	2.2
6037231300	47.29	85.80	85-90%	5348 Los Angeles	15.7	76.8	7.5	64	1.6	30.2	0.3	1.2	2.6
6071004001	47.26	85.79	85-90%	4763 San Bernardino	17.3	75.9	6.8	82.5	12.7	2.5	0.5	1.2	0.7
6099000302	47.26	85.77	85-90%	2641 Stanislaus	16.6	70.6	12.8	47.1	46.3	2.1	0.7	1.7	2
6037190700	47.23	85.76	85-90%	3379 Los Angeles	4.1	83.9	12	34.3	47.1	9	0.4	6.5	2.8
6037576901	47.22	85.75	85-90%	6092 Los Angeles	17.1	78.7	4.2	55.9	11	12.7	0.2	17.5	2.7
6037123901	47.20	85.74	85-90%	4500 Los Angeles	12.6	78.9	8.5	54.7	33.3	4.2	0.2	5.4	2.1
6037241201	47.18	85.72	85-90%	2898 Los Angeles	16.6	74.8	8.6	51.8	0.7	46.3	0.1	0.2	0.9
6075023102	47.15	85.71	85-90%	3478 San Francisco	15.5	74.9	9.6	16.2	4.9	61	0.4	13.7	3.8
6071002301	47.14	85.70	85-90%	9721 San Bernardino	17.2	77	5.8	72.9	11.3	8.5	0.3	5.8	1.2
6059087403	47.12	85.69	85-90%	3186 Orange	18.4	77.6	4	86.7	7.2	1.2	0.2	4	0.7
6037602505	47.12	85.67	85-90%	4072 Los Angeles	19.2	76.9	3.9	52.8	5.2	35.4	0.2	4.5	1.9
6065940400	47.10	85.66	85-90%	6504 Riverside	20.4	75.7	3.9	96.6	2.3	0.4	0.3	0.1	0.3
6037404402	47.09	85.65	85-90%	5107 Los Angeles	15.3	76.4	8.3	78.9	10.9	0.7	0.4	8.4	0.7
6085503601	47.09	85.64	85-90%	2992 Santa Clara	16.2	74.3	9.5	54.4	26.3	1.4	0.2	15.3	2.4
6037530004	47.08	85.62	85-90%	3695 Los Angeles	11.7	72.9	15.4	73.2	14.7	0.5	0.2	10.6	0.8
6029000300	47.07	85.61	85-90%	4217 Kern	16.8	71.2	12	21.1	73.5	0.5	1.8	0.7	2.5
6071002206	47.07	85.60	85-90%	6656 San Bernardino	14.1	80.6	5.3	55.3	26.3	7.9	0.3	7.6	2.6
6025011600	47.06	85.58	85-90%	6310 Imperial	15.9	73.5	10.6	84.9	11.8	1.6	0.2	0.7	0.9
6037551102	47.06	85.57	85-90%	5503 Los Angeles	18.6	77.5	3.9	79	8.3	7.4	0.3	3.8	1.1
6029001300	47.05	85.56	85-90%	7559 Kern	23.7	71.6	4.7	83.1	8	6.5	1.3	0.2	0.9
6059074403	47.04	85.55	85-90%	5688 Orange	24.7	72.6	2.7	94.6	2.3	0.2	0.1	2.4	0.4
6037218800	47.02	85.53	85-90%	2658 Los Angeles	14	77.2	8.8	62.3	2.7	25.1	0.2	8.2	1.5
6037430101	46.99	85.52	85-90%	4887 Los Angeles	10.4	66.4	23.2	50.1	24.5	8.5	0.5	13.9	2.5
6071003506	46.99	85.51	85-90%	4802 San Bernardino	18.8	75	6.2	67.5	8.9	19.6	0.2	2.1	1.7
6037542501	46.95	85.50	85-90%	4307 Los Angeles	18.3	75.8	5.9	40.7	0.7	51.6	0.1	5.6	1.3
6007001300	46.95	85.48	85-90%	4169 Butte	14.6	78.9	6.5	30.8	51.5	2.2	2.8	9.1	3.7
6077005114	46.95	85.47	85-90%	7721 San Joaquin	17.1	77.8	5.1	34.4	40.9	6.3	0.2	14.3	4
6037216900	46.94	85.46	85-90%	5060 Los Angeles	8.5	76	15.5	19.7	35	34.2	0.3	6.1	4.7
6039001000	46.94	85.45	85-90%	5319 Madera	13	72.2	14.8	53.8	41	1	0.5	2.6	1.3
6099003904	46.92	85.43	85-90%	4374 Stanislaus	14.5	71.4	14.1	40.2	54.5	1	0.4	1.7	2.1
6037535605	46.92	85.42	85-90%	4153 Los Angeles	17.8	74.6	7.6	96.2	1.8	0.6	0	1	0.4
6037404401	46.92	85.41	85-90%	3979 Los Angeles	17.4	75	7.6	85.3	9.7	0.7	0.3	3.4	0.6
6001401400	46.92	85.40	85-90%	4314 Alameda	12.5	79.6	7.9	21.1	15.2	48.4	0.6	10	4.6
6037231800	46.92	85.38	85-90%	5303 Los Angeles	18.4	77.7	3.9	86.9	1.1	11.1	0.1	0.1	0.7
6071005200	46.92	85.37	85-90%	4141 San Bernardino	16.3	74.3	9.4	54.9	29.7	9.4	0.6	2.2	3
6029004000	46.91	85.36	85-90%	7704 Kern	18.8	76.5	4.7	83	13.5	1.4	0.5	1	0.6
6071006402	46.90	85.34	85-90%	4951 San Bernardino	21.1	74	4.9	64.4	10.2	17.7	0.5	5.3	1.8
6071003302	46.89	85.33	85-90%	6037 San Bernardino	18.6	73.5	7.9	73.2	19.2	5.1	0.4	0.8	1.3
6037550300	46.87	85.32	85-90%	7727 Los Angeles	13.6	76.7	9.7	70.4	16	3.4	0.3	8.6	1.3
6037980010	46.87	85.31	85-90%	164 Los Angeles	5.5	71.9	22.6	14	28.7	0.6	0	56.1	0.6
6065031704	46.87	85.29	85-90%	5284 Riverside	13.4	74.8	11.8	52.5	34.4	5.8	0.5	5.4	1.4
6019005608	46.86	85.28	85-90%	3064 Fresno	12.2	63.6	24.2	25.8	63.3	2.1	1.5	3.9	3.4
6019003302	46.86	85.27	85-90%	4749 Fresno	18	73.3	8.7	67.6	20	4.8	0.5	5.2	2
6037190902	46.85	85.26	85-90%	3960 Los Angeles	10.1	81.3	8.6	60.7	27.8	3.1	0	6.5	1.8
6037209401	46.85	85.24	85-90%	3914 Los Angeles	14.2	72.9	12.9	73.1	4.8	4.5	0.2	16.3	1.1
6077005126	46.85	85.23	85-90%	4131 San Joaquin	16.3	71.3	12.4	40.7	45.8	3.4	0.8	5.4	3.9
6029004200	46.83	85.22	85-90%	1320 Kern	19	71.3	9.7	67	30	0.4	1.1	0.3	1.2
6073003501	46.82	85.21	85-90%	4255 San Diego	19.2	75.3	5.5	84.3	2.6	10.2	0.2	1.6	1.1
6037127711	46.80	85.19	85-90%	3356 Los Angeles	14.1	77.8	8.1	55.2	31.6	4.4	0.3	6.4	2.1
6073015901	46.78	85.18	85-90%	3450 San Diego	18.3	76.8	4.9	48.8	31.2	9.9	0.2	4.6	5.4
6037231210	46.77	85.17	85-90%	3688 Los Angeles	16	78.5	5.5	71.2	2.1	23.8	0.1	1.6	1.2
6047001501	46.76	85.16	85-90%	2693 Merced	17.7	74.8	7.5	58.3	18.8	3.2	0.5	16.9	2.3
6065043401	46.75	85.14	85-90%	5791 Riverside	17.9	73.4	8.7	52.9	35.8	6.8	0.8	1	2.8
6037132002	46.74	85.13	85-90%	3299 Los Angeles	12	76.5	11.5	39.6	47.5	2.6	0.3	7.7	2.4
6037234300	46.73	85.12	85-90%	4098 Los Angeles	9.6	75.2	15.2	6.2	1	89	0.2	0.9	2.7
6065042405	46.69	85.11	85-90%	4997 Riverside	22.6	74.1	3.3	48.7	14.5	30.8	0.5	2.7	2.7
6085503122	46.69	85.09	85-90%	3449 Santa Clara	14.4	77.8	7.8	31.1	14.4	6	0.2	46.4	1.9
6037407102	46.69	85.08	85-90%	5445 Los Angeles	14.3	76.7	9	86.8	4	0.4	0.2	7.9	0.6
6071006203	46.69	85.07	85-90%	4771 San Bernardino	22.9	70	7.1	53	16.5	24.7	0.5	2.7	2.6
6099001100	46.68	85.05	85-90%	3899 Stanislaus	13.4	70.8	15.8	28.6	57.8	4.8	0.8	3.8	4.1
6029002900	46.68	85.04	85-90%	7449 Kern	18.7	70.8	10.5	59.1	24.2	10.8	0.6	3.2	2
6071008002	46.66	85.03	85-90%	7256 San Bernardino	17.1	74.9	8	65.8	16.8	10.6	0.4	4	2.4
6065042516	46.65	85.02	85-90%	4177 Riverside	21.4	72.6	6	67.2	10.5	15.1	0.4	4.3	2.4
6037433403	46.64	85.00	85-90%	4675 Los Angeles	17.5	77.2	5.3	82.7	2.4	0.2	0.1	14.4	0.2
6001403000	46.63	84.99	80-85%	2788 Alameda	4.4	51.4	44.2	1.3	4.2	4.4	0.1	88.3	1.6
6037544001	46.63	84.98	80-85%	4791 Los Angeles	15.1	76.6	8.3	69.2	7.1	7.3	0.1	14.8	1.6
6071001103	46.63	84.97	80-85%	3997 San Bernardino	13.2	73.6	13.2	54	39	3.1	0.3	1.9	1.8
6071003000	46.62	84.95	80-85%	3120 San Bernardino	14.4	71.4	14.2	73.8	15.4	6.6	0.3	2.1	1.7
6065042514	46.62	84.94	80-85%	3165 Riverside	20.2	74.3	5.5	60.4	14.7	16.5	0.2	5.1	3.1
6037554302	46.62	84.93	80-85%	3916 Los Angeles	16.5	78.1	5.4	53.8	11.6	19.5	0.3	12.8	2
6037310601	46.61	84.92	80-85%	5716 Los Angeles	11.3	78.7	10	32.3	43.5	3.1	0.1	17.2	3.8
6037531201	46.60	84.90	80-85%	5335 Los Angeles	18.4	74.5	7.1	97.8	1.4	0.1	0.1	0.2	0.3
6037191301	46.58	84.89	80-85%	2327 Los Angeles	9.9	76.4	13.7	56.7	17.7	4	0.1	20.2	1.3
6037133000	46.56	84.88	80-85%	4449 Los Angeles	12.9	76.3	10.8	55.9	27.3	3.1	0.1	11.5	2
6077005123	46.54	84.87	80-85%	4493 San Joaquin	15.3	78.1	6.6	35.6	45.8	5.4	0.4	9	3.9
6013305000	46.53	84.85	80-85%	6620 Contra Costa	16.8	75.6	7.6	45.6	33.7	12.9	0.6	2.7	4.4
6037270100	46.49	84.84	80-85%	4412 Los Angeles	6.2	88.5	5.3	20.6	40.1	10.7	0.2	23.4	4.9
6067006702	46.49	84.83	80-85%	7560 Sacramento	20.5	73	6.5	30.8	14.9	19.7	0.4	29.7	4.6
6107000202	46.49	84.82	80-85%	2663 Tulare	18.1	73.6	8.3	81.5	13.7	0.2	0.4	3.2	1
6037501001	46.47	84.80	80-85%	3248 Los Angeles	16.6	75.4	8	92.9	4.5	0.6	0.7	0.8	0.5
6013380000	46.47	84.79	80-85%	5706 Contra Costa	12.8	79.3	7.9	22.9	28	28	0.2	16.4	4.6
6037403000	46.47	84.78	80-85%	6835 Los Angeles	16.4	75.5	8.1	81.5	4.2	6.4	0.1	7.1	0.7
6037238200	46.47	84.76	80-85%	5267 Los Angeles	13	71.8	15.2	21.8	1	74.1	0.3	0.9	1.9
6037208720	46.47	84.75	80-85%	4179 Los Angeles	14.8	78.6	6.6	81.6	5	3	0.1	9.4	0.9
6065030900	46.46	84.74	80-85%	3308 Riverside	15.4	77.9	6.7	65.2	23.9	5.2	0.3	3.3	2.1
6037600100	46.44	84.73	80-85%	6657 Los Angeles	18.4	74.4	7.2	55.1	0.9	42.1	0.2	0.3	1.5
6077005202	46.40	84.71	80-85%	6765 San Joaquin	15.8	75.5	8.7	25.8	49.4	6.1	0.3	13.3	5.1
6037191420	46.40	84.70	80-85%	3365 Los Angeles	13.4	81.3	5.3	70	8.7	1.4	0	18.5	1.4
6037570303	46.38	84.69	80-85%	4247 Los Angeles	18.2	77	4.8	62.8	8.5	15.2	0.3	11.4	1.8
6019003201	46.37	84.68	80-85%	4398 Fresno	17.2	72.2	10.6	53.2	23.5	5.8	0.6	15.1	1.8
6037302104	46.32	84.66	80-85%	3917 Los Angeles	9.4	78.7	11.9	25.7	39.4	2.6	0.2	28.3	3.8
6019001408	46.32	84.65	80-85%	2504 Fresno	4.5	51.3	44.2	37.5	46.3	7.1	0.6	7.1	1.4
6071007110	46.27	84.64	80-85%	4831 San Bernardino	14.2	77.7	8.1	39.3	25.3	8	0.2	22.9	4.3
6071004510	46.26	84.63	80-85%	5178 San Bernardino	11.2	86.6	2.2	39.5	25.8	22.7	0.4	8.3	3.3
6013375000	46.26	84.61	80-85%	4389 Contra Costa	19.7	75.2	5.1	78.6	3.6	12.6	0.1	3.7	1.4
6037502401	46.25	84.60	80-85%	4747 Los Angeles	12.4	74.8	12.8	90.9	4.7	1.1	0.3	2.6	0.4
6073005300	46.24	84.59	80-85%	6667 San Diego	1.5	85.9	12.6	33.1	46.8	9.1	0.5	7.6	2.9
6071003510	46.24	84.58	80-85%	4512 San Bernardino	23.6	72.8	3.6	66.5	6.1	23.4	0.2	1.5	2.3
6001401700	46.23	84.56	80-85%	2667 Alameda	12.3	83.2	4.5	25.6	25.9	33.1	0.4	10.3	4.6
6037433503	46.22	84.55	80-85%	3108 Los Angeles	16.2	77	6.8	78.2	2.3	0.2	0	19.1	0.2
6037237720	46.22	84.54	80-85%	3153 Los Angeles	21.5	74.5	4	75.3	0.5	22.5	0.1	0.2	1.5
6037221110	46.22	84.53	80-85%	3565 Los Angeles	16.4	76.5	7.1	88.6	2.4	1.2	0.2	7.1	0.4

6073005700	46.21	84.51	80-85%	1948 San Diego	2.7	82.7	14.6	17.7	58.9	12.6	0.9	6.6	3.3
6037234501	46.21	84.50	80-85%	2728 Los Angeles	12.2	75.1	12.7	35.6	1.6	57.8	0.2	1.1	3.6
6037432901	46.20	84.49	80-85%	4464 Los Angeles	11.2	76.9	11.9	29.6	5.1	0.4	0	64.2	0.6
6019003808	46.19	84.47	80-85%	5082 Fresno	18	74.6	7.4	50.4	21.4	7.1	0.6	18.6	1.8
6071001810	46.19	84.46	80-85%	4497 San Bernardino	16.4	78.4	5.2	79.2	10.7	4.8	0.2	4	1.2
6019004207	46.17	84.45	80-85%	8115 Fresno	19.1	75	5.9	47.3	22.3	8.2	0.7	19.2	2.4
6059099601	46.16	84.44	80-85%	7016 Orange	13.6	74.6	11.8	37.8	18.2	1.1	0.1	40.9	2
6025010200	46.15	84.42	80-85%	2640 Imperial	18.8	69.6	11.6	83.8	14.2	0.6	0.2	0.5	0.7
6037121102	46.14	84.41	80-85%	2721 Los Angeles	13.1	76	10.9	57.8	34	0.9	0.1	5.7	1.4
6037701801	46.13	84.40	80-85%	5867 Los Angeles	7.2	81.8	11	37.2	35.9	8.7	0.4	14.3	3.5
6029000600	46.12	84.39	80-85%	6931 Kern	21.5	67.6	10.9	46.9	30	16.8	1.2	2	3.1
6037197420	46.10	84.37	80-85%	3509 Los Angeles	9.7	81.1	9.2	60.1	23.4	1.7	0.3	12.4	2.1
6037555001	46.10	84.36	80-85%	5411 Los Angeles	13.3	76.9	9.8	46.1	17.7	8.5	0.5	25.2	2.1
6037553200	46.08	84.35	80-85%	7055 Los Angeles	13	76	11	56.3	22.9	7.5	0.6	10.6	2.1
6071003700	46.06	84.34	80-85%	3903 San Bernardino	18.9	70.8	10.3	71.9	10.4	15	0.4	1.1	1.2
6037602003	46.05	84.32	80-85%	5124 Los Angeles	18.7	75.3	6	80.5	1.8	14.6	0.2	1.3	1.5
6019004002	46.04	84.31	80-85%	7129 Fresno	19.3	72.4	8.3	75.4	13.3	0.2	0.3	9.4	1.5
6037407802	46.04	84.30	80-85%	3635 Los Angeles	13.7	77.6	8.7	79.8	8	2.4	0.2	8.6	1
6059074406	46.04	84.29	80-85%	3797 Orange	17.2	78.3	4.5	87.8	7.9	1.3	0.2	2	0.8
6099003201	46.03	84.27	80-85%	5055 Stanislaus	16.9	74.8	8.3	73.9	21.4	1.5	0.3	1.5	1.3
6037402706	46.03	84.26	80-85%	3945 Los Angeles	13.8	78.2	8	73.4	11.2	8.2	0.2	5.9	1.1
6037533401	46.01	84.25	80-85%	5004 Los Angeles	17.7	76.2	6.1	97.7	1.6	0.1	0.1	0.1	0.4
6037502602	45.99	84.24	80-85%	4321 Los Angeles	14.7	75	10.3	86.7	8.1	1	0.2	3.2	0.9
6037234902	45.99	84.22	80-85%	4005 Los Angeles	15.9	75.5	8.6	44	1.8	51.4	0.1	0.3	2.4
6073003301	45.97	84.21	80-85%	3337 San Diego	17.1	75.9	7	66.1	1.9	26.6	0	3.9	1.4
6037575202	45.96	84.20	80-85%	4916 Los Angeles	19.2	75.9	4.9	61	2.8	6.8	0.1	28	1.4
6029002812	45.93	84.18	80-85%	5215 Kern	19.1	73.5	7.4	47.2	34.5	13	1	1.8	2.6
6019004216	45.93	84.17	80-85%	2629 Fresno	15.6	75.6	8.8	36.7	40.7	4.7	0.9	14.1	2.9
6059087102	45.93	84.16	80-85%	5816 Orange	18.4	77.8	3.8	60.7	16	3.6	0.2	17.8	1.7
6073004800	45.91	84.15	80-85%	4115 San Diego	17.4	77.1	5.5	88.5	5	4.1	0.1	1.1	1.3
6059011720	45.89	84.13	80-85%	7329 Orange	22.3	74.6	3.1	91	4.5	1.2	0.3	2.6	0.5
6085501600	45.89	84.12	80-85%	6854 Santa Clara	11.9	84.4	3.7	49.4	24.7	4.7	0.3	18.2	2.7
6037294302	45.88	84.11	80-85%	4754 Los Angeles	17.1	75.9	7	87.9	6	1.9	0.1	3.1	1
6029003700	45.85	84.10	80-85%	3953 Kern	20.1	72.8	7.1	62.5	33.5	1.4	0.7	0.8	1.1
6059086404	45.84	84.08	80-85%	6546 Orange	15.4	77.8	6.8	76.9	10.1	0.7	0.3	11	0.9
6037217200	45.82	84.07	80-85%	3905 Los Angeles	11.1	79	9.9	40.9	17.3	29.5	0.1	8.3	3.9
6037211202	45.82	84.06	80-85%	2645 Los Angeles	12.9	80.3	6.8	69.6	7.8	2.9	0.1	17.7	2
6037320300	45.79	84.05	80-85%	6948 Los Angeles	15.3	74.2	10.5	96.4	2	0.4	0.3	0.6	0.3
6107001701	45.79	84.03	80-85%	6117 Tulare	18.6	73.8	7.6	52	40.6	2.4	1.1	2.1	1.8
6037500600	45.78	84.02	80-85%	5688 Los Angeles	15.6	72.8	11.6	95	3.2	0.2	0.1	1.1	0.4
6019006700	45.77	84.01	80-85%	6304 Fresno	16.6	69.3	14.1	60.1	33.9	0.1	0.3	4	1.6
6065041813	45.76	84.00	80-85%	6698 Riverside	15.5	72.9	11.6	65.9	27.4	3.2	0.4	2.1	1
6037186404	45.76	83.98	80-85%	2471 Los Angeles	13.6	78.5	7.9	77.9	7.1	0.6	0.2	13.5	0.8
6037236204	45.76	83.97	80-85%	3203 Los Angeles	18.6	73.8	7.6	42.4	1.2	53.8	0.2	0.4	2
6077003403	45.76	83.96	80-85%	4586 San Joaquin	15.9	76.7	7.4	30.2	12.2	12.5	0.4	41.1	3.6
6037208802	45.74	83.95	80-85%	2906 Los Angeles	10.6	78.1	11.3	59.8	13.8	5.6	0.2	19.2	1.4
6065041412	45.71	83.93	80-85%	4415 Riverside	12.9	72.5	14.6	51	30.4	4.6	0.1	11.8	2.1
6019004504	45.71	83.92	80-85%	4762 Fresno	12.3	70.1	17.6	36.8	49.2	5.6	0.5	5.6	2.4
6037302103	45.70	83.91	80-85%	5504 Los Angeles	8.3	77.3	14.4	22.1	55.1	0.9	0	18.3	3.7
6071003503	45.70	83.89	80-85%	5489 San Bernardino	15.9	79	5.1	66	9.7	18	0.2	3.9	2.2
6067009007	45.68	83.88	80-85%	2818 Sacramento	16.9	77	6.1	26.3	36.1	20.2	0.8	10.8	5.9
6037189201	45.68	83.87	80-85%	3293 Los Angeles	4.6	84.2	11.2	14.3	68.9	3.6	0.1	10.1	3.1
6019003004	45.67	83.86	80-85%	2301 Fresno	14.8	72.6	12.6	49.5	28.6	5.3	1.3	12.6	2.8
6037572302	45.67	83.84	80-85%	3483 Los Angeles	14.9	76.1	9	53.9	3.7	12.2	0.1	27.7	2.3
6037601002	45.67	83.83	80-85%	5311 Los Angeles	14.6	78	7.4	43.1	2.1	49.6	0.2	3.4	1.7
6037123104	45.66	83.82	80-85%	4596 Los Angeles	12.9	77.4	9.7	63.6	24.6	3.5	0.3	5.4	2.5
6065045604	45.66	83.81	80-85%	13694 Riverside	22.9	73	4.1	97.4	1.7	0.2	0.1	0.3	0.2
6029004901	45.66	83.79	80-85%	5733 Kern	21.2	72	6.8	76.6	4.8	1.2	0.1	15.8	1.5
6039000202	45.63	83.78	80-85%	6109 Madera	17.2	73.9	8.9	41.2	47.9	2.8	0.7	5.1	2.4
6071007601	45.58	83.77	80-85%	7277 San Bernardino	22.2	73	4.8	66.2	12.3	13	0.4	5.4	2.5
6037408138	45.56	83.76	80-85%	5936 Los Angeles	16.5	75.2	8.3	88.1	6	1.1	0.1	4	0.7
6037501504	45.55	83.74	80-85%	3592 Los Angeles	13.1	69	17.9	69	21	1.4	0.3	6.8	1.4
6019008401	45.55	83.73	80-85%	7991 Fresno	19	74.4	6.6	90.5	8.2	0.4	0.3	0.5	0.3
6037235202	45.55	83.72	80-85%	4557 Los Angeles	14.3	74.7	11	31.5	1.4	64.6	0.2	0.6	1.8
6067005101	45.54	83.71	80-85%	4454 Sacramento	16.4	74.1	9.5	28.3	25.6	12.5	0.5	27.9	5.3
6037222001	45.54	83.69	80-85%	3237 Los Angeles	12.7	78.5	8.8	63.8	4	26.8	0.3	2	3.1
6037500404	45.52	83.68	80-85%	4795 Los Angeles	13.7	73.5	12.8	88.6	4.2	0.4	0.1	6.1	0.6
6037533107	45.52	83.67	80-85%	3645 Los Angeles	17.1	76.5	6.4	97.2	2.2	0.1	0.1	0.3	0.1
6059001404	45.51	83.65	80-85%	3972 Orange	17.1	75.9	7	76.8	17.4	0.9	0.3	3.5	1.1
6073013205	45.50	83.64	80-85%	2381 San Diego	17	75.3	7.7	85.7	8.1	2.9	0.1	2.3	1
6037197300	45.50	83.63	80-85%	3909 Los Angeles	8.1	82.4	9.5	44.4	33.1	1.5	0.2	18.3	2.6
6019007600	45.49	83.62	80-85%	4806 Fresno	18.8	71.8	9.4	69.3	23.6	0.9	0.3	4.7	1.2
6001432400	45.48	83.60	80-85%	5814 Alameda	13.8	76.3	9.9	37.4	23.9	8	0.4	26.5	3.7
6037199202	45.48	83.59	80-85%	3031 Los Angeles	13.8	76.4	9.8	79.2	7.7	2	0.1	9.9	1.1
6037301802	45.47	83.58	80-85%	3578 Los Angeles	9.6	75.3	15.1	16.2	61.5	1	0	17	4.3
6047000601	45.47	83.57	80-85%	5438 Merced	16.8	73.6	9.6	56.1	36	2.7	0.4	2.6	2.2
6071000205	45.46	83.55	80-85%	4736 San Bernardino	12.8	74.5	12.7	65.2	21.6	4.9	0.2	6	2.1
6037120010	45.46	83.54	80-85%	2844 Los Angeles	14.6	78.8	6.6	77.9	7.7	2.1	0.1	10.1	2.2
6037601900	45.45	83.53	80-85%	5685 Los Angeles	19.1	76.6	4.3	82.4	1.3	13.9	0.1	1.2	1.1
6065041500	45.44	83.52	80-85%	2053 Riverside	18.8	73.8	7.4	87.3	7.2	2.3	0.5	1.9	0.8
6065041201	45.42	83.50	80-85%	4299 Riverside	14.4	75.7	9.9	67	22.2	3.7	0.3	5.8	1
6099000303	45.41	83.49	80-85%	5883 Stanislaus	16.3	76	7.7	53.9	39.4	1.8	0.5	2.4	2
6073011700	45.40	83.48	80-85%	6773 San Diego	13.8	70.3	15.9	61.6	7.4	2.4	0.2	26.1	2.3
6065041409	45.38	83.47	80-85%	14898 Riverside	15.6	77.8	6.6	32.2	42.1	6.9	0.2	15.7	2.9
6071003606	45.37	83.45	80-85%	5109 San Bernardino	16.7	76.2	7.1	78.6	14.7	3.5	0.2	1.6	1.3
6037501804	45.37	83.44	80-85%	2131 Los Angeles	15.1	77	7.9	79.3	16.8	0.7	0.2	2.3	0.8
6065040403	45.36	83.43	80-85%	5801 Riverside	15.2	78.4	6.4	72.6	23.9	1	0.3	1.2	1
6037570601	45.35	83.42	80-85%	5421 Los Angeles	16.4	78.1	5.5	57.3	8.6	17.9	0.1	14	2.1
6037224320	45.35	83.40	80-85%	3224 Los Angeles	16.1	75.3	8.6	92	1.4	3.9	0.1	2.6	0.1
6037204120	45.34	83.39	80-85%	2650 Los Angeles	16.9	74.6	8.5	97.7	0.9	0.1	0.2	0.9	0.2
6037554002	45.33	83.38	80-85%	5659 Los Angeles	15.4	77.2	7.4	58.3	16.9	9.7	0.1	13.4	1.6
6019005607	45.33	83.36	80-85%	3993 Fresno	13.9	72.6	13.5	31	54.5	3.7	1.1	6.7	3
6107001100	45.33	83.35	80-85%	6983 Tulare	22.3	71.9	5.8	74.9	14.3	1.9	0.5	6.8	1.6
6037127606	45.33	83.34	80-85%	3164 Los Angeles	15.1	77.9	7	60.8	24.2	5.3	0.3	7.1	2.2
6037104403	45.32	83.33	80-85%	3282 Los Angeles	15.8	75.3	8.9	96.3	1.8	0.5	0.1	0.9	0.4
6019005000	45.30	83.31	80-85%	3917 Fresno	13.5	72.4	14.1	40.8	42.3	4.4	0.7	8.9	3
6037240401	45.29	83.30	80-85%	5383 Los Angeles	20.8	74.5	4.7	71.2	0.6	26.5	0.1	0.4	1.2
6065031602	45.29	83.29	80-85%	5314 Riverside	16.2	74.1	9.7	59.3	27.9	6	1	3.4	2.4
6037104103	45.29	83.28	80-85%	4085 Los Angeles	14.6	77.2	8.2	71.4	7.5	12.6	0.1	6.9	1.5
6111004715	45.27	83.26	80-85%	5020 Ventura	16.4	75.3	8.3	73.6	12.4	3	0.2	9	1.9
6037554203	45.27	83.25	80-85%	3689 Los Angeles	14.3	76.2	9.5	51.5	25	10.8	0.5	10.8	1.4
6059011721	45.26	83.24	80-85%	5023 Orange	17.2	77.8	5	71.1	19.1	2	0.2	5.8	1.9
6019005305	45.26	83.23	80-85%	3635 Fresno	17.2	72	10.8	41.1	34.1	7.1	1.4	13.4	2.9
6059086306	45.25	83.21	80-85%	3658 Orange	12.9	76.3	10.8	48.6	32.7	2.6	0.2	13.8	2.1
6037572100	45.22	83.20	80-85%	1045 Los Angeles	11.3	78.1	10.6	29.3	18.8	13.7	0.5	34.3	3.5
6085503110	45.22	83.19	80-85%	4618 Santa Clara	20.9	73.2	5.9	64	2.2	2	0.3	30.5	0.9
6059074602	45.22	83.18	80-85%	9156 Orange	19.9	75.7	4.4	96.3	2.5	0.3	0.1	0.6	0.1
6059086402	45.22	83.16	80-85%	5651 Orange	15.1	76.5	8.4	68.8	20.2	1.2	0.2	8.1	1.5
6047001002	45.22	83.15	80-85%	13467 Merced	15.4	76.9	7.7	35.1	36.3	5.2	0.4	19.7	3.3
6059089001	45.21	83.14	80-85%	7154 Orange	13.7	76.9	9.4	44.1	5.2	0.3	0.1	49.1	1.3
6037402403	45.20	83.13	80-85%	5381 Los Angeles	11.4	81.4	7.2	59.4	21.1	5.6	0.1	10.8	3
6029001400	45.20	83.11	80-85%	7766 Kern	22.2	70.4	7.4	79.4	13.4	4.4	1	0.5	1.4
6077003110	45.19	83.10	80-85%	3708 San Joaquin	15.6	73	11.4	36	36.9	12.7	0.3	9.1	4.9
6037407602	45.19	83.09	80-85%	4008 Los Angeles	15.5	75.5	9	84.8	6.3	0.9	0.2	7.3	0.5
6037602004	45.18	83.07	80-85%	4126 Los Angeles	16.4	77.3	6.3	73.2	0.8	23.6	0	1.7	0.7
6029003103	45.17	83.06	80-85%	3979 Kern	18.4	74.9	6.7	76.7	18.5	2.3	0.8	0.9	0.8
6037600902	45.15	83.05	80-85%	6613 Los Angeles	14.8	76.9	8.3	41.8	2.7	52.6	0.2	0.8	1.9
6095250801	45.15	83.04	80-85%	3917 Solano	10.5	78.9	10.6	13.1	33.6	30.1	0.3	17.5	5.4
6071003509	45.15	83.02	80-85%	4827 San Bernardino	18.7	74.4	6.9	79	12.7	5.9	0.1	1.4	1
6067009318	45.14	83.01	80-85%	2620 Sacramento	14.9	77.1	8	23.1	16.7	12	0.3	43.3	4.7
6037211310	45.10	83.00	80-85%	3846 Los Angeles	14	80.8	5.2	74.8	6.6	2.9	0.1	14.3	1.5
6037550100	45.10	82.99	80-85%	7518 Los Angeles	13.8	76.4	9.8	77.2	11.5	2.4	0.1	8	0.8
6037213201	45.10	82.97	80-85%	4198 Los Angeles	13.2	76.8	10	50.4	2.7	2.9	0.1	42.9	1

6019005301	45.09	82.96	80-85%	5740 Fresno	14.8	74	11.2	44.5	33.4	5.3	0.6	14	2.2
6029004101	45.08	82.95	80-85%	4917 Kern	18.7	70.2	11.1	64.4	32.7	0.4	0.3	0.9	1.2
6019004704	45.08	82.94	80-85%	5212 Fresno	21.9	71.8	6.3	62.7	18.5	11	0.6	5	2.2
6037237102	45.07	82.92	80-85%	3254 Los Angeles	18.3	74.3	7.4	73.8	0.8	23.6	0	0.6	1.3
6037432201	45.06	82.91	80-85%	4342 Los Angeles	10.1	72.2	17.7	23.5	11.1	0.6	0.2	63.8	0.9
6037601100	45.06	82.90	80-85%	6533 Los Angeles	16.4	74.9	8.7	58.5	2.8	33.2	0.3	3.4	1.7
6037234600	45.05	82.89	80-85%	5024 Los Angeles	11.7	75.9	12.4	31.5	1.6	63.4	0.1	0.9	2.5
6067004801	45.03	82.87	80-85%	5899 Sacramento	15.1	72.8	12.1	20.4	11.3	15.8	0.3	48	4.2
6047000301	45.03	82.86	80-85%	4790 Merced	18.4	75.3	6.3	71.3	9.6	0.5	0.2	16.7	1.6
6099003805	45.02	82.85	80-85%	2667 Stanislaus	18.1	76.6	5.3	41.5	44.8	1.2	0.5	8.9	3.2
6031001002	45.02	82.84	80-85%	4424 Kings	20.3	69.6	10.1	68.8	20.8	5.2	0.6	2.9	1.7
6037218600	45.00	82.82	80-85%	3142 Los Angeles	14.2	76.3	9.5	52.7	5.9	36.2	0.2	2.2	2.8
6037554204	44.99	82.81	80-85%	4391 Los Angeles	16	72.5	11.5	58	14.9	15.6	0.4	8.7	2.4
6087110400	44.98	82.80	80-85%	7976 Santa Cruz	21	75.2	3.8	82.2	11.7	0.6	0.2	4.5	0.9
6099002802	44.96	82.78	80-85%	6310 Stanislaus	15	74.2	10.8	37.8	57.2	0.5	0.8	1.6	2.2
6037601801	44.96	82.77	80-85%	3789 Los Angeles	17.6	78	4.4	90.3	1.8	4.8	0.2	2	1
6019006100	44.95	82.76	80-85%	7536 Fresno	18.4	72.9	8.7	79.4	13.4	0.8	0.5	5	0.9
6037119340	44.93	82.75	80-85%	3884 Los Angeles	22.5	75.4	2.1	94.1	2.2	2	0	1.3	0.4
6019006502	44.93	82.73	80-85%	4159 Fresno	21.7	71.1	7.2	89.4	8.3	0.4	0.5	1	0.4
6037106648	44.93	82.72	80-85%	3890 Los Angeles	18.1	74.6	7.3	89.4	5.5	2.2	0.2	1.4	1.2
6107001004	44.92	82.71	80-85%	8235 Tulare	21	72.6	6.4	77.6	7.3	1.2	0.4	12.3	1.2
6037600400	44.92	82.70	80-85%	3986 Los Angeles	12.4	72.5	15.1	12.8	1.7	81.9	0.1	0.8	2.7
6037127806	44.92	82.68	80-85%	3447 Los Angeles	12.9	80.5	6.6	60.8	23.5	5.8	0.3	7.9	1.8
6001433200	44.90	82.67	80-85%	6897 Alameda	10.9	74	15.1	22.9	24.1	15.5	0.2	33.8	3.5
6037195600	44.88	82.66	80-85%	3340 Los Angeles	10.3	80.6	9.1	55.7	24.9	2.6	0.1	14.2	2.5
6037534002	44.88	82.65	80-85%	4352 Los Angeles	16.7	75.6	7.7	91.4	5.7	1.5	0.3	0.9	0.3
6107003200	44.87	82.63	80-85%	6446 Tulare	22.1	72.5	5.4	80.3	18.6	0.1	0.3	0.3	0.5
6037209520	44.86	82.62	80-85%	2791 Los Angeles	14.1	80.2	5.7	83.8	1.7	2.5	0.3	11.2	0.4
6037269700	44.84	82.61	80-85%	4085 Los Angeles	12	79.2	8.8	36.1	35.6	12.6	0.2	11.3	4.3
6001409300	44.83	82.60	80-85%	5229 Alameda	17	74.2	8.8	60.1	2.8	31.4	0.2	3.5	1.9
6019005403	44.83	82.58	80-85%	4171 Fresno	15.2	80.9	3.9	36	31	15.4	0.8	14.1	2.7
6065030200	44.83	82.57	80-85%	4633 Riverside	12.4	77.9	9.7	34.1	53.2	6.2	0.6	2.5	3.4
6037543222	44.82	82.56	80-85%	6611 Los Angeles	9.9	71.5	18.6	9.6	3.1	76	0.1	8	3.2
6053010101	44.80	82.55	80-85%	4518 Monterey	19.7	74.8	5.5	87.9	8.9	0.3	0.3	1.8	0.8
6037602507	44.78	82.53	80-85%	4156 Los Angeles	15.5	78	6.5	36.5	5.4	49	0.2	6.5	2.4
6047001401	44.77	82.52	80-85%	3953 Merced	17.3	74	8.7	49.7	35.7	4.7	1.1	5.7	3.1
6071000605	44.76	82.51	80-85%	5274 San Bernardino	17.6	73.5	8.9	90.4	6.9	0.5	0.1	1.7	0.4
6037552601	44.75	82.49	80-85%	5720 Los Angeles	16.2	76.6	7.2	92	3.6	0.6	0.4	2.8	0.6
6037203900	44.73	82.48	80-85%	2944 Los Angeles	16.2	74.8	9	97.3	1.2	0.4	0.1	0.7	0.2
6037407001	44.73	82.47	80-85%	5905 Los Angeles	15.5	74.6	9.9	88.3	4.1	1.1	0.1	5.9	0.4
6065044000	44.73	82.46	80-85%	2109 Riverside	17.6	75.7	6.7	64.2	27.5	2.1	1.4	2.5	2.3
6037190100	44.72	82.44	80-85%	4481 Los Angeles	3.1	90.8	6.1	18.2	62.6	6.8	0.3	8.7	3.3
6037575103	44.70	82.43	80-85%	5119 Los Angeles	14.6	80.4	5	43.3	20.4	19.9	0.5	12	3.9
6037541802	44.69	82.42	80-85%	5431 Los Angeles	18.4	76	5.6	87.9	1.2	9.7	0.2	0.4	0.6
6037269601	44.69	82.41	80-85%	3413 Los Angeles	14.9	79.9	5.2	64.2	8.8	20.6	0.2	3.1	3
6001401500	44.68	82.39	80-85%	2630 Alameda	9.2	83.8	7	15.4	20	52.9	0.1	7.6	3.9
6039000503	44.68	82.38	80-85%	8539 Madera	17	73.6	9.4	57.1	31.7	3	0.5	5.8	1.9
6037221710	44.67	82.37	80-85%	2621 Los Angeles	10.9	77.9	11.2	76.5	6	7.5	0	9	1
6029003113	44.67	82.36	80-85%	4784 Kern	18.6	69.7	11.7	59.5	22.4	10.1	0.3	5.7	2
6037191110	44.62	82.34	80-85%	3338 Los Angeles	6.8	75.7	17.5	36.6	47.5	3.1	0.2	10.1	2.6
6067003204	44.59	82.33	80-85%	5456 Sacramento	17.2	74.1	8.7	37.5	10.3	8.4	0.6	39.9	3.2
6071004403	44.58	82.32	80-85%	5647 San Bernardino	17.8	76.8	5.4	77.7	9.8	7.9	0.3	2.8	1.5
6029005204	44.56	82.31	80-85%	6158 Kern	9.9	67	23.1	10.1	83.1	0.2	2.1	0.7	3.7
6065031502	44.54	82.29	80-85%	8020 Riverside	15.6	72.2	12.2	52.4	36.6	5.3	0.4	3.3	2
6085504602	44.52	82.28	80-85%	2144 Santa Clara	13.9	76.8	9.3	61.1	17.6	2.1	0.4	16.7	2.1
6085503214	44.50	82.27	80-85%	7253 Santa Clara	16.6	72.7	10.7	35.4	6.1	1.5	0.1	55.5	1.3
6071007303	44.50	82.26	80-85%	4828 San Bernardino	13.2	77.5	9.3	30.5	30.7	11.9	0.2	22.9	3.7
6037222500	44.50	82.24	80-85%	4963 Los Angeles	14.8	77.9	7.3	71.7	1.5	23.2	0.3	1.8	1.6
6071003612	44.48	82.23	80-85%	4256 San Bernardino	17.3	74.6	8.1	68	12.4	11.8	0.3	5.9	1.7
6047000304	44.47	82.22	80-85%	9116 Merced	17.8	74.5	7.7	72.9	8.8	0.4	0.3	16.3	1.2
6107001302	44.44	82.20	80-85%	8037 Tulare	18.6	72.5	8.9	52	37.1	2.2	0.6	5.9	2.2
6037294410	44.43	82.19	80-85%	4579 Los Angeles	16.5	75.4	8.1	40.9	13.5	23.9	0.1	18.4	3.1
6037554105	44.42	82.18	80-85%	4569 Los Angeles	19.4	74.1	6.5	54.7	13.3	19.9	0.1	10	2
6013366002	44.39	82.17	80-85%	6093 Contra Costa	17.9	76.1	6	61	8.2	13.7	0.3	14.3	2.5
6037407702	44.38	82.15	80-85%	6497 Los Angeles	13.9	76.2	9.9	77.9	6.7	2	0.2	12.7	0.6
6019005204	44.37	82.14	80-85%	4105 Fresno	16.6	73.1	10.3	44.3	31.6	6.1	1	13.8	3.1
6001403300	44.37	82.13	80-85%	4054 Alameda	7	80.2	12.8	6	25.4	11.2	0.2	54	3.2
6037535902	44.36	82.12	80-85%	6519 Los Angeles	14.9	76.6	8.5	94.9	3.8	0.2	0.1	0.8	0.2
6065040303	44.36	82.10	80-85%	3243 Riverside	17.4	75.3	7.3	71.4	20.4	2.6	0.2	4.1	1.4
6095250900	44.36	82.09	80-85%	2798 Solano	14.4	65.4	20.2	19.1	20.8	36.2	0.8	17.8	5.4
6025010102	44.35	82.08	80-85%	5007 Imperial	17.3	71.8	10.9	78.8	14.9	2.8	0.9	1.2	1.5
6019007700	44.34	82.07	80-85%	5599 Fresno	19.4	72.3	8.3	69.9	26.1	1.6	0.5	0.7	1.3
6059074502	44.33	82.05	80-85%	5674 Orange	17.6	76.5	5.9	91.7	2.5	0.2	0.1	5.2	0.2
6107004101	44.29	82.04	80-85%	9670 Tulare	23.3	71.8	4.9	83.8	11.1	0.6	0.9	2.5	1.1
6101050302	44.28	82.03	80-85%	6071 Sutter	19.1	72.3	8.6	55.9	33	1.6	1	5.6	2.9
6071009116	44.28	82.02	80-85%	6717 San Bernardino	25.2	70.2	4.6	57.3	17.2	21	0.4	1.1	2.9
6067007001	44.27	82.00	80-85%	3842 Sacramento	19.4	72.7	7.9	56.7	24.4	5.3	1.1	8.8	3.7
6073011601	44.26	81.99	80-85%	5891 San Diego	16.7	77.1	6.2	82.5	4.9	2.2	0.3	9.1	1
6071001808	44.25	81.98	80-85%	4413 San Bernardino	14.1	80.8	5.1	63	23.7	8	0.1	3.6	1.5
6115040100	44.25	81.96	80-85%	4615 Yuba	11.9	77.9	10.2	26.1	57.8	4.6	2.3	5	4.2
6037235201	44.25	81.95	80-85%	2781 Los Angeles	12.9	73.8	13.3	31.1	1.2	63.2	0.4	0.5	3.7
6047000504	44.24	81.94	80-85%	6129 Merced	21.6	72.3	6.1	73.4	19.1	1.2	0.2	4.7	1.4
6037601802	44.23	81.93	80-85%	4658 Los Angeles	18	77	5	94.8	2.1	1.7	0.1	0.8	0.5
6037551700	44.20	81.91	80-85%	6547 Los Angeles	15.6	76.1	8.3	79.1	11.4	4.1	0.2	3.9	1.2
6075061200	44.19	81.90	80-85%	4089 San Francisco	12.5	77	10.5	36.7	7.6	31.3	0.4	21.4	2.5
6037296901	44.19	81.89	80-85%	4127 Los Angeles	14.8	77.7	7.5	60.4	24.4	6.4	0.3	5.1	3.4
6037550800	44.19	81.88	80-85%	7170 Los Angeles	12.1	75.2	12.7	67.9	23.7	2.2	0.2	5.2	0.9
6071002803	44.19	81.86	80-85%	3982 San Bernardino	20.8	74.4	4.8	82.3	9	6.5	0.1	1.4	0.8
6037500500	44.18	81.85	80-85%	2950 Los Angeles	13.2	73.1	13.7	89	5.6	0.9	0.1	4.3	0.2
6037115403	44.18	81.84	80-85%	3188 Los Angeles	14.6	77.7	7.7	57.4	21.6	4	0.1	14.8	2.2
6099003400	44.18	81.83	80-85%	1601 Stanislaus	13.4	73.5	13.1	60.3	37.3	0.9	0.4	0.5	0.6
6029002813	44.17	81.81	80-85%	4161 Kern	16.7	75.2	8.1	44.1	32.4	14.6	0.3	5.9	2.7
6037128220	44.17	81.80	80-85%	3011 Los Angeles	12.5	79.3	8.2	44.5	44.9	4.1	0.1	4.5	1.8
6037139303	44.17	81.79	80-85%	4186 Los Angeles	10.8	76.4	12.8	26.8	53.8	6.5	0.4	7.3	5.4
6059011403	44.16	81.78	80-85%	5565 Orange	13.3	76.6	10.1	47.9	38.6	1.9	0.3	9.1	2.2
6031000300	44.16	81.76	80-85%	7446 Kings	25.1	74.7	0.2	19.5	56.8	9	0.6	7.9	6.3
6029002700	44.15	81.75	80-85%	5370 Kern	17.3	74	8.7	59.3	30.5	5.2	0.7	1.9	2.3
6037209810	44.13	81.74	80-85%	2472 Los Angeles	12.2	70.5	17.3	71.9	7.4	8.5	0.1	11.2	0.8
6037572201	44.11	81.73	80-85%	6197 Los Angeles	11.2	73	15.8	30.5	17.6	16.9	0.2	31.3	3.5
6077004403	44.11	81.71	80-85%	4230 San Joaquin	22.3	72.6	5.1	68.8	15.1	0.4	0.2	14.2	1.3
6037209104	44.10	81.70	80-85%	2434 Los Angeles	16.1	77.9	6	84.6	4.6	4.7	0.1	5.1	0.9
6081612000	44.09	81.69	80-85%	7327 San Mateo	17.8	76.2	6	72.8	3.2	13	0.1	9	2
6099003002	44.08	81.67	80-85%	6818 Stanislaus	17.7	73.3	9	56.4	36.9	0.8	0.5	3.3	2
6025010300	44.08	81.66	80-85%	933 Imperial	10.8	73.7	15.5	55.4	42.1	0.2	0.6	1.2	0.4
6065045706	44.08	81.65	80-85%	4821 Riverside	21.8	72.4	5.8	98.4	0.9	0.3	0	0.2	0.1
6059088101	44.07	81.64	80-85%	2078 Orange	14	78.6	7.4	40.4	38.1	2	0.3	16.5	2.7
6099001300	44.07	81.62	80-85%	5778 Stanislaus	11.6	73.6	14.8	18.2	74.3	1.8	0.6	2.3	2.7
6037208902	44.05	81.61	80-85%	2339 Los Angeles	16.5	78	5.5	91.3	2.9	0.7	0.3	4.3	0.6
6037405203	44.04	81.60	80-85%	3484 Los Angeles	14.7	75.9	9.4	70	6.4	1	0.3	21.4	0.9
6037208401	44.01	81.59	80-85%	3770 Los Angeles	17.1	71.8	11.1	78.8	3.5	1.6	0.1	15.3	0.8
6037131701	43.97	81.57	80-85%	4541 Los Angeles	12.5	77.7	9.8	38.1	30.8	6.6	0.2	21.1	3.3
6037131010	43.96	81.56	80-85%	6409 Los Angeles	14.6	78.2	7.2	55.7	21.2	4.2	0.1	15.4	3.3
6001402500	43.96	81.55	80-85%	1784 Alameda	19.5	74.2	6.3	4.5	8.1	66.8	0.4	16.5	3.6
6047002500	43.95	81.54	80-85%	2328 Merced	13.2	73.4	13.4	33	58.1	0.6	0.9	6.1	1.4
6037234800	43.95	81.52	80-85%	3426 Los Angeles	13.5	74.4	12.1	42.5	1.3	52.8	0.1	0.5	2.9
6037221602	43.94	81.51	80-85%	2816 Los Angeles	16.1	76.8	7.1	90.5	1.7	4.1	0	2.9	0.7
6107003700	43.94	81.50	80-85%	5931 Tulare	19.1	70.7	10.2	58.8	34.1	0.7	1	2.9	2.4
6019007802	43.94	81.49	80-85%	5269 Fresno	22.6	73.1	4.3	96.2	1.9	0.6	0.2	0.3	0.9
6037106510	43.94	81.47	80-85%	5108 Los Angeles	13.2	79.4	7.4	63.8	20.1	6.8	0.3	7.4	1.6
6067006201	43.92	81.46	80-85%	6290 Sacramento	15.3	73.6	11.1	27.7	47.6	14	0.8	5	4.8
6037124203	43.91	81.45	80-85%	2748 Los Angeles	14.5	79.7	5.8	75.7	16.2	2.4	0.4	3.8	1.5
6013368001	43.89	81.44	80-85%	5327 Contra Costa	18	76.8	5.2	78.4	5.6	8.1	0.2	6.6	1
6077005305	43.89	81.42	80-85%	6495 San Joaquin	15.1	74.1	10.8	42.7	37.3	6.4	0.3	9.5	3.8

6037104108	43.88	81.41	80-85%	5256 Los Angeles	17.2	74.4	8.4	79.3	4.8	11.1	0.1	3.5	1.2
6037530901	43.88	81.40	80-85%	4080 Los Angeles	19.1	73.8	7.1	98.6	0.4	0.1	0	0.5	0.4
6037127805	43.88	81.38	80-85%	3768 Los Angeles	12.3	71.9	15.8	60.4	27.7	4.3	0.2	6	1.5
6029000507	43.88	81.37	80-85%	3598 Kern	14.9	72.1	13	23.3	69.1	1.3	1.1	3.7	1.6
6037190201	43.87	81.36	80-85%	2870 Los Angeles	5	83.9	11.1	34.4	47.9	9	0.6	5.4	2.7
6065042519	43.85	81.35	80-85%	1706 Riverside	18.9	75.4	5.7	63.7	11.1	18.9	0.4	3.5	2.5
6067006202	43.84	81.33	80-85%	3599 Sacramento	14.8	75.1	10.1	33.2	41.7	14	0.7	6.4	4
6059087805	43.83	81.32	80-85%	6952 Orange	16.6	76.4	7	59.1	18.4	3.2	0.1	17.6	1.6
6037553100	43.81	81.31	80-85%	6298 Los Angeles	13.7	76.2	10.1	44.6	24.3	15.2	0.3	12.6	2.9
6059074004	43.80	81.30	80-85%	7444 Orange	13.1	78.9	8	58.6	19.5	2.5	0.1	17.1	2.2
6037185202	43.79	81.28	80-85%	3712 Los Angeles	12.4	77.1	10.5	64	23.9	3	0.2	6.8	2
6071009800	43.79	81.27	80-85%	5017 San Bernardino	19.5	72.8	7.7	63.1	20.4	11.3	0.8	1.7	2.7
6037531800	43.79	81.26	80-85%	5066 Los Angeles	16.7	75.9	7.4	96.8	2.3	0.2	0.2	0.3	0.1
6037301801	43.77	81.25	80-85%	4079 Los Angeles	9.3	75.7	15	18.9	52	2.4	0.2	21.6	4.9
6071002105	43.76	81.23	80-85%	5036 San Bernardino	13.9	75.1	11	50.1	32.2	7	0.1	8.7	1.9
6107001602	43.76	81.22	80-85%	5745 Tulare	17.6	74	8.4	72.1	24.2	0.2	1	1	1.5
6065040301	43.76	81.21	80-85%	7857 Riverside	17.3	72.5	10.2	75.5	18.1	3.3	0.5	1.6	1
6047001503	43.76	81.20	80-85%	4438 Merced	22.6	70	7.4	75.8	5.9	5.2	0.2	11.9	1
6037555211	43.76	81.18	80-85%	5818 Los Angeles	17.1	75.7	7.2	89	4.4	0.8	0.4	5	0.3
6001410500	43.75	81.17	80-85%	2193 Alameda	15.8	76.4	7.8	9.1	7.1	62	0	17.1	4.7
6001432501	43.73	81.16	80-85%	4839 Alameda	13.3	74.4	12.3	36.4	19.9	5.7	0.3	35	2.6
6111003201	43.71	81.15	80-85%	4577 Ventura	20	74.5	5.5	97.1	1.8	0.7	0.1	0	0.3
6037117405	43.70	81.13	80-85%	3442 Los Angeles	23.1	74.9	2	90.6	3.3	3.6	0.1	1.6	0.8
6113010204	43.69	81.12	80-85%	4922 Yolo	13.1	69.5	17.4	35.2	51.1	2.2	1.6	5.4	4.4
6037106604	43.68	81.11	80-85%	5020 Los Angeles	16.6	75.2	8.2	85.4	8	2.1	0.4	3.6	0.5
6107004500	43.66	81.09	80-85%	6628 Tulare	19.1	72	8.9	72.7	23.9	0.2	0.5	1.8	0.8
6037533104	43.65	81.08	80-85%	4356 Los Angeles	19.2	72.7	8.1	97.9	1.1	0.6	0	0.3	0.2
6037134520	43.63	81.07	80-85%	5453 Los Angeles	16.2	76.5	7.3	72.8	14.6	2.8	0.2	7.7	2
6037600302	43.61	81.06	80-85%	3317 Los Angeles	11.7	73.7	14.6	27.1	0.8	69.2	0.2	0.3	2.4
6071006604	43.60	81.04	80-85%	4278 San Bernardino	18.6	73.3	8.1	84.8	5.6	5.8	0.1	2.9	0.8
6029003114	43.60	81.03	80-85%	7654 Kern	17	75.2	7.8	47.4	37.5	8.5	0.5	4	2
6037531202	43.60	81.02	80-85%	4747 Los Angeles	17.9	75.9	6.2	99	0.5	0.1	0	0.2	0.1
6037554101	43.60	81.01	80-85%	3799 Los Angeles	18	77.9	4.1	69.6	11.2	9.1	0.3	8.3	1.5
6071001704	43.59	80.99	80-85%	5056 San Bernardino	13.9	79.3	6.8	65.8	19.3	5.9	0.2	7.1	1.7
6037540101	43.57	80.98	80-85%	6483 Los Angeles	15.8	77.5	6.7	89.4	1.9	7.5	0.2	0.7	0.3
6037293202	43.57	80.97	80-85%	6742 Los Angeles	17.5	77.6	4.9	69.7	6.7	6.3	0.2	15.2	1.9
6099003908	43.56	80.96	80-85%	2226 Stanislaus	15.4	70.4	14.2	40.1	50.9	1.8	0.3	2.7	4.3
6053000900	43.56	80.94	80-85%	5746 Monterey	20.7	73.5	5.8	93.1	3.9	0.5	0.1	1.6	0.8
6065043405	43.56	80.93	80-85%	4217 Riverside	13.6	59.4	27	37.4	51.1	6.7	1.1	1.4	2.4
6085501102	43.54	80.92	80-85%	4477 Santa Clara	13.4	76.4	10.2	64.6	20	2.1	0.2	11.1	2
6037208610	43.54	80.91	80-85%	4195 Los Angeles	11.7	79.5	8.8	47.2	3.8	3.2	0.2	43.6	2
6081602300	43.53	80.89	80-85%	3753 San Mateo	12.5	77.1	10.4	45.4	19.5	1.5	0.2	30.3	3.2
6071000208	43.53	80.88	80-85%	4124 San Bernardino	14.1	75.6	10.3	71.5	18.6	3.4	0.2	5.1	1.2
6047000901	43.51	80.87	80-85%	3970 Merced	14.9	77.4	7.7	53.2	39.9	3	0.2	2	1.7
6037530203	43.48	80.86	80-85%	3238 Los Angeles	12.8	76.3	10.9	79.7	7.2	0.4	0.3	11.5	0.8
6013358000	43.46	80.84	80-85%	5298 Contra Costa	14.2	74.7	11.1	24.6	39.8	17	0.4	13	5.2
6037191901	43.44	80.83	80-85%	3355 Los Angeles	5.4	88.6	6	26.5	53.2	6.7	0.2	9.4	4
6047000203	43.44	80.82	80-85%	9272 Merced	19.4	74.9	5.7	72.4	20.6	0.9	0.3	4.4	1.4
6037554405	43.44	80.80	80-85%	3040 Los Angeles	13.2	74.7	12.1	36	23.2	22.3	0.7	16.2	1.6
6029001102	43.42	80.79	80-85%	6682 Kern	21.5	72.2	6.3	83.9	11.4	2.8	0.6	0.5	0.9
6037197600	43.42	80.78	80-85%	2376 Los Angeles	11.1	80.5	8.4	55	20.4	2	0.2	21	1.4
6037533106	43.42	80.77	80-85%	1743 Los Angeles	16.7	75.9	7.4	96.8	2.2	0.1	0	0.8	0
6037119002	43.41	80.75	80-85%	7210 Los Angeles	14.2	77.3	8.5	86.5	5.3	0.5	0.1	6.8	0.8
6059011502	43.40	80.74	80-85%	4101 Orange	11.8	80.2	8	45	35.5	1.9	0.2	15.3	2.2
6037555102	43.40	80.73	80-85%	6526 Los Angeles	14.4	77.1	8.5	49	9.9	10.3	0.3	28.4	2.1
6071002804	43.40	80.72	80-85%	5417 San Bernardino	24.8	72.5	2.7	85.5	4.2	8.3	0.1	1	0.8
6059110603	43.39	80.70	80-85%	8540 Orange	15.8	79	5.2	57.4	12.9	4.4	0.2	23.9	1.2
6071001806	43.39	80.69	80-85%	4760 San Bernardino	13.3	80.4	6.3	59.4	24.6	7	0.2	7.8	1.1
6071012002	43.38	80.68	80-85%	5366 San Bernardino	16.9	70.4	12.7	45.8	33.8	11.9	1.4	3.9	3.2
6013381000	43.38	80.67	80-85%	6097 Contra Costa	16.2	74.3	9.5	42.6	4.8	44.1	0.3	5	3.2
6037603500	43.37	80.65	80-85%	3074 Los Angeles	11.2	76.1	12.7	40.8	19.4	10.3	0.4	26.2	3
6037534403	43.37	80.64	80-85%	2948 Los Angeles	16.4	77.6	6	96.5	2.5	0.2	0.1	0.4	0.2
6077003409	43.36	80.63	80-85%	4450 San Joaquin	15.6	77.4	7	33.2	12.7	10.9	0.2	39.5	3.6
6037576001	43.36	80.62	80-85%	4969 Los Angeles	4.1	85.4	10.5	18.4	48.3	13	0.4	15.4	4.6
6007003700	43.36	80.60	80-85%	4505 Butte	12.9	71.5	15.6	11.1	67.9	0.9	4	12.4	3.7
6067009316	43.36	80.59	80-85%	4605 Sacramento	15.5	78	6.5	19.6	22	14	0.2	38.8	5.3
6073003403	43.34	80.58	80-85%	4283 San Diego	17.7	75.1	7.2	75.3	3.5	11.3	0.2	8.3	1.5
6107003902	43.32	80.57	80-85%	5847 Tulare	19.7	70.9	9.4	60	34.2	0.5	0.9	3	1.5
6059086501	43.32	80.55	80-85%	4848 Orange	16.7	77.4	5.9	83.7	12.4	0.6	0.1	2	1.2
6037128102	43.31	80.54	80-85%	4795 Los Angeles	14.7	80	5.3	68.1	18.2	5.8	0.2	6.1	1.6
6071000901	43.31	80.53	80-85%	4600 San Bernardino	12	71.9	16.1	47	38.8	6	0.3	5.5	2.4
6037294520	43.31	80.51	80-85%	3564 Los Angeles	19	75.8	5.2	94.7	2.7	1	0.2	1.1	0.3
6059063605	43.30	80.50	80-85%	5672 Orange	18.3	77.8	3.9	75.4	19.7	1	0.2	1.9	1.9
6099001200	43.28	80.49	80-85%	3623 Stanislaus	13.3	78.1	8.6	23.4	66.8	2.7	0.7	1.9	4.4
6037543502	43.27	80.48	80-85%	4560 Los Angeles	13	76.5	10.5	50.1	18.9	3.6	0.4	23.8	3.2
6037132700	43.24	80.46	80-85%	4912 Los Angeles	14.2	76.7	9.1	60	29.1	2.6	0.1	6	2.1
6001438203	43.22	80.45	80-85%	3920 Alameda	10.1	74.7	15.2	25	18.9	6.5	0.3	44.6	4.8
6037191203	43.21	80.44	80-85%	2922 Los Angeles	9.2	79.2	11.6	45.1	27.4	4.4	0.2	20.6	2.2
6019006300	43.21	80.43	80-85%	7254 Fresno	14.8	72.9	12.3	54.3	38.8	0.4	0.8	3.7	1.8
6037461600	43.20	80.41	80-85%	5826 Los Angeles	15.5	75.6	8.9	59.9	8.2	22	0.2	7.9	1.8
6037573402	43.19	80.40	80-85%	6430 Los Angeles	14.9	77.7	7.4	36.2	25.2	14	0.2	20.4	3.9
6071002107	43.19	80.39	80-85%	4970 San Bernardino	13.8	79.9	6.3	52.5	30.2	8.7	0.3	5.9	2.4
6037117303	43.19	80.38	80-85%	3512 Los Angeles	11	75.7	13.3	39.2	39.8	3	0.1	16	1.8
6065042404	43.18	80.36	80-85%	2038 Riverside	17	76.1	6.9	57.7	16.9	18	0.1	3.8	3.5
6019007202	43.18	80.35	80-85%	5109 Fresno	17.2	70.4	12.4	55.5	39.7	0.5	0.5	2	2
6029001000	43.17	80.34	80-85%	9186 Kern	19.6	73.7	6.7	67.2	27.9	1.2	0.9	1.3	1.4
6065031701	43.17	80.33	80-85%	2943 Riverside	14.6	74	11.4	52.7	32.5	7.5	0.1	5.4	1.8
6059086406	43.16	80.31	80-85%	4330 Orange	15.9	76.3	7.8	59.5	25.1	1.8	0.3	11.4	1.9
6029001700	43.16	80.30	80-85%	4287 Kern	12.5	74.4	13.1	24.4	66.4	3.6	0.7	1.9	3
6037601212	43.15	80.29	80-85%	6511 Los Angeles	16.3	78.2	5.5	66.5	2.6	28.6	0.2	0.9	1.2
6067009008	43.14	80.27	80-85%	4928 Sacramento	16.5	73.8	9.7	26.5	50.7	9.2	0.8	8	4.8
6037554404	43.13	80.26	80-85%	4447 Los Angeles	15.2	78.4	6.4	49.1	17.7	16.5	0.3	13.4	2.9
6065043006	43.11	80.25	80-85%	4703 Riverside	17.7	76.1	6.2	63	27.3	4.6	0.7	2.5	2
6019002906	43.05	80.24	80-85%	5520 Fresno	19.8	72.7	7.5	51.2	15.1	7	0.5	24.6	1.5
6029001500	43.04	80.22	80-85%	3147 Kern	18.6	73.6	7.8	74.9	12.3	10.5	0.5	0.7	1
6081610201	42.97	80.21	80-85%	5764 San Mateo	17.8	74.5	7.7	74.4	12.1	2.5	0.4	8.3	2.2
6059087404	42.95	80.20	80-85%	3591 Orange	19.6	76.7	3.7	89.1	6.2	0.7	0.3	3	0.8
6037302506	42.95	80.19	80-85%	3534 Los Angeles	9.9	75	15.1	29.3	53.9	2.2	0	11.1	3.5
6059001801	42.93	80.17	80-85%	5544 Orange	17.8	76.5	5.7	58.7	20.6	4.3	0.3	14.3	1.8
6037191204	42.93	80.16	80-85%	2124 Los Angeles	10.1	77.8	12.1	45.9	33	2.4	0.1	16.3	2.3
6037408302	42.93	80.15	80-85%	4036 Los Angeles	15.1	73	11.9	79.4	8.9	0.6	0.2	9.8	1
6037222200	42.92	80.14	80-85%	3965 Los Angeles	12.9	78.8	8.3	64.9	5.7	23.6	0.1	3.5	2.2
6037221900	42.92	80.12	80-85%	3664 Los Angeles	4.4	88.1	7.5	28.8	26.6	8.1	0	31.8	4.6
6059089106	42.92	80.11	80-85%	3973 Orange	14.8	74.6	10.6	67.5	9	0.6	0.1	22	0.8
6071003804	42.89	80.10	80-85%	4578 San Bernardino	15.3	74.6	10.1	59.9	11	24.3	0.2	3.1	1.6
6037186301	42.89	80.09	80-85%	2999 Los Angeles	16.5	76.6	6.9	73.5	12.6	2.5	0	10	1.3
6037192520	42.89	80.07	80-85%	5067 Los Angeles	14.1	79.5	6.4	75.5	4.8	1.1	0.1	17.5	1
6037192510	42.89	80.06	80-85%	3670 Los Angeles	12.2	78.3	9.5	50.4	4.8	1	0.2	42.4	1.2
6029006304	42.89	80.05	80-85%	3895 Kern	20.5	73.5	6	92	6.4	0.3	0.2	0.6	0.5
6059074200	42.88	80.04	80-85%	9450 Orange	17.6	77.4	5	95.2	2.8	0.1	0.1	1.4	0.4
6085503602	42.87	80.02	80-85%	4741 Santa Clara	17.5	72.3	10.2	59.6	7.7	2.6	0.1	28.6	1.5
6037552900	42.86	80.01	80-85%	6881 Los Angeles	14.2	76.1	9.7	61	14.6	5	0.2	17.3	1.9
6065031002	42.86	80.00	75-80%	4559 Riverside	17.9	75.5	6.6	70.3	21.5	4.1	0.2	2.5	1.4
6085501401	42.85	79.98	75-80%	3295 Santa Clara	19.5	73.5	7	75.5	10.6	2.7	0.4	9.3	1.6
6077005130	42.85	79.97	75-80%	3186 San Joaquin	16	76.8	7.2	54.4	31.3	2.8	0.8	8.7	2
6029003400	42.85	79.96	75-80%	4318 Kern	18.2	73.5	8.3	45.8	50.3	0.3	0.3	1.4	1.8
6075017801	42.84	79.95	75-80%	3499 San Francisco	1.8	40.6	57.6	4	25.6	3.2	0.1	64.6	2.5
6029003206	42.83	79.93	75-80%	12112 Kern	19.8	75.3	4.9	53.2	24.1	6.2	0.2	14	2.3
6077003601	42.82	79.92	75-80%	3453 San Joaquin	10.7	69.5	19.8	31.5	59.5	0.9	0.8	5	2.2
6037404902	42.80	79.91	75-80%	3973 Los Angeles	15	76.6	8.4	71.9	5.2	0.4	0.1	22	0.6
6029002815	42.79	79.90	75-80%	4282 Kern	19.3	72.9	7.8	46	31.9	15	0.7	3.6	2.8
6065042706	42.77	79.88	75-80%	8393 Riverside	20.2	76	3.8	74.2	7.4	12.9	0.3	2.9	2.3
6001402400	42.77	79.87	75-80%	2351 Alameda	12.1	71.4	16.5	9.4	12.6	57.8	0.5	14.2	5.5

6085512310	42.75	79.86	75-80%	3791 Santa Clara	18.1	74.3	7.6	48.7	32.9	2.3	0.3	12.5	3.3
6037601303	42.74	79.85	75-80%	4879 Los Angeles	14.3	77.8	7.9	34.3	2.6	58.5	0.4	1.5	2.7
6019005804	42.73	79.83	75-80%	6626 Fresno	15.2	76.3	8.5	35.9	44.7	2.7	0.8	13.4	2.5
6071002602	42.71	79.82	75-80%	7639 San Bernardino	16.9	79.2	3.9	76	11.2	7.2	0.3	4	1.3
6037554001	42.70	79.81	75-80%	4171 Los Angeles	13.8	77.4	8.8	56	23.5	6	0.2	12.3	1.9
6111004704	42.68	79.80	75-80%	1469 Ventura	17.5	74.5	8	82.3	13.7	1.2	0.1	1.3	1.4
6037134720	42.68	79.78	75-80%	4594 Los Angeles	12.8	78.8	8.4	45	27.8	6.3	0.1	17.5	3.4
6067006300	42.68	79.77	75-80%	4592 Sacramento	14.7	77	8.3	33.6	43.4	8.8	1.2	8.5	4.3
6099002006	42.67	79.76	75-80%	4458 Stanislaus	13.7	80.8	5.5	38.9	41.6	4.6	0.6	10.3	3.9
6037602506	42.65	79.75	75-80%	4329 Los Angeles	15.4	80.3	4.3	35.9	4.4	49.2	0.1	7.9	2.4
6113010101	42.65	79.73	75-80%	6645 Yolo	14.3	74.4	11.3	41.3	38.5	5.8	1.4	9.3	3.8
6037297201	42.65	79.72	75-80%	3475 Los Angeles	14.9	76.9	8.2	55.5	28.5	7.3	0.5	4.7	3.5
6037212203	42.64	79.71	75-80%	2679 Los Angeles	12.8	74.2	13	77.6	2	2.6	0.1	17.2	0.6
6073011801	42.63	79.69	75-80%	3961 San Diego	14.9	76.9	8.2	77.3	8.2	2.2	0.2	11.1	1
6037221220	42.62	79.68	75-80%	3378 Los Angeles	14.4	77.4	8.2	88.4	2.3	2.1	0.1	6.5	0.7
6071003101	42.62	79.67	75-80%	5040 San Bernardino	19.2	75.4	5.4	83.3	9.9	3.4	0.3	2.2	1
6037120108	42.62	79.66	75-80%	4838 Los Angeles	18	75.8	6.2	82.2	6.2	3.8	0.3	6.6	0.9
6071007407	42.58	79.64	75-80%	2940 San Bernardino	20.8	74.6	4.6	52.4	12.4	25.6	1	6.1	2.4
6019003301	42.58	79.63	75-80%	3507 Fresno	15.6	69.3	15.1	56.6	27.8	4.8	1.5	8.3	1.1
6037120103	42.58	79.62	75-80%	3287 Los Angeles	22.5	75.6	1.9	91.9	2.3	2.9	0	2.3	0.6
6031000200	42.55	79.61	75-80%	2271 Kings	13.4	74.1	12.5	34.5	60.9	1.6	0.4	1	1.7
6019006202	42.55	79.59	75-80%	6807 Fresno	18.7	73.1	8.2	89.5	7.8	0.2	0.3	1.6	0.6
6071008001	42.55	79.58	75-80%	6513 San Bernardino	14.8	74.5	10.7	54.2	25.6	4.7	0.3	13.2	2.1
6059075002	42.54	79.57	75-80%	8605 Orange	19	72.1	8.9	86.1	6.1	1.3	0.1	5.9	0.5
6037208620	42.53	79.56	75-80%	4660 Los Angeles	12.1	79.5	8.4	52.5	4.1	5.7	0.3	35.2	2.2
6077005133	42.52	79.54	75-80%	4249 San Joaquin	14.5	75.6	9.9	46	45.4	2.3	0.7	2.7	3
6019005410	42.51	79.53	75-80%	3298 Fresno	14.5	72.8	12.7	39.5	40.2	6.1	0.6	11.2	2.4
6071000603	42.50	79.52	75-80%	5576 San Bernardino	14.9	77.3	7.8	60	27.5	4.2	0.4	6.2	1.6
6059074108	42.48	79.51	75-80%	5226 Orange	16.6	76.9	6.5	88.5	3.8	0.5	0.1	6.6	0.6
6037576403	42.47	79.49	75-80%	5033 Los Angeles	17.7	78.5	3.8	53.5	7.4	17.2	0.6	18.9	2.4
6037407900	42.46	79.48	75-80%	6296 Los Angeles	13.3	76.9	9.8	67.7	7	3	0.1	20.9	1.3
6037124105	42.45	79.47	75-80%	2658 Los Angeles	14.6	79.4	6	60.3	29.2	4.1	0.1	4.2	2.1
6037503104	42.43	79.46	75-80%	2719 Los Angeles	18.7	74.6	6.7	88.6	7.9	0.1	0.1	2.3	1
6037117404	42.40	79.44	75-80%	4279 Los Angeles	9.4	78.2	12.4	39	36.5	4.9	0.1	16.9	2.6
6019005203	42.40	79.43	75-80%	4519 Fresno	17.4	72.6	10	51.7	27	9.3	0.8	9.3	1.9
6037551401	42.38	79.42	75-80%	4290 Los Angeles	14.2	77	8.8	73.4	16	3.2	0.2	6.1	1.1
6029001201	42.37	79.40	75-80%	2895 Kern	19.1	74.4	6.5	82.2	11.3	4.2	1.4	0.3	0.5
6077005135	42.37	79.39	75-80%	5139 San Joaquin	13.6	70	16.4	28.8	56.6	2.4	0.4	7.9	3.9
6037134904	42.35	79.38	75-80%	4338 Los Angeles	14.1	76.1	9.8	54.5	29.5	4.1	0.2	9.4	2.3
6013314103	42.34	79.37	75-80%	5546 Contra Costa	17.9	76.9	5.2	54.5	14.3	14.9	0.4	13	2.9
6037602504	42.33	79.35	75-80%	4407 Los Angeles	16.8	79.1	4.1	44.1	5	38.5	0.2	9.6	2.5
6047000801	42.33	79.34	75-80%	4444 Merced	15.8	71.4	12.8	48.6	36.9	5.5	0.2	6	2.7
6099000601	42.32	79.33	75-80%	4647 Stanislaus	13.1	78.2	8.7	35.2	52.4	3.2	0.4	6.3	2.6
6115040302	42.32	79.32	75-80%	2143 Yuba	22.2	71.5	6.3	49.6	36.4	2	0.8	8.1	3
6037603004	42.32	79.30	75-80%	1512 Los Angeles	10.8	72.9	16.3	28.4	6.3	19.8	0	43.3	2.2
6073012501	42.30	79.29	75-80%	3858 San Diego	14.4	70.6	15	70.7	13.8	5.2	0.5	7.5	2.3
6037209403	42.30	79.28	75-80%	3600 Los Angeles	13.6	68.6	17.8	70.6	4.8	5.1	0.1	18.7	0.7
6037127520	42.30	79.27	75-80%	4045 Los Angeles	19.8	77.6	2.6	82	6.2	3	0.1	6.5	2.1
6071000824	42.29	79.25	75-80%	5092 San Bernardino	15.6	74.4	10	47.1	34.4	10.6	0.3	5.1	2.5
6067006101	42.29	79.24	75-80%	4608 Sacramento	11.8	75.4	12.8	19.2	60.7	9.3	0.8	5.3	4.7
6037535503	42.28	79.23	75-80%	2497 Los Angeles	17.9	74.9	7.2	97.7	1.4	0.1	0.2	0.5	0.1
6037221120	42.28	79.22	75-80%	3373 Los Angeles	16.2	77.6	6.2	93.6	2.1	1.6	0.1	1.8	0.8
6037406800	42.28	79.20	75-80%	4926 Los Angeles	12.6	74.3	13.1	55.2	15.2	2.8	0.3	24.9	1.7
6029006500	42.27	79.19	75-80%	5152 Kern	5.5	85.3	9.2	59	34.4	1.6	0.5	2.3	2.2
6067007007	42.27	79.18	75-80%	5356 Sacramento	15.7	73.3	11	54.1	25.7	9.6	0.4	7	3.1
6029002816	42.26	79.17	75-80%	5465 Kern	18.1	74.7	7.2	48	36.7	9.2	1.1	2.9	2.1
6037402803	42.26	79.15	75-80%	3436 Los Angeles	19.9	75.4	4.7	88.2	4.6	3.7	0.1	2.9	0.6
6077001000	42.25	79.14	75-80%	4915 San Joaquin	13.8	68.5	17.7	35.9	46.4	7.7	0.2	5.9	3.8
6071000903	42.24	79.13	75-80%	4338 San Bernardino	16.9	75.3	7.8	60.2	23	8.8	0.4	5.9	1.7
6029001202	42.23	79.11	75-80%	6264 Kern	25.6	71.1	3.3	83.9	6.6	7.3	0.7	0.5	0.9
6013320001	42.22	79.10	75-80%	3615 Contra Costa	14.3	76.6	9.1	33.3	52.8	2.6	0.7	5.9	4.8
6037212800	42.22	79.09	75-80%	4273 Los Angeles	12.1	76.3	11.6	53.1	8.1	8.8	0.1	28.1	1.8
6037237800	42.21	79.08	75-80%	4371 Los Angeles	14.3	75.4	10.3	47.7	0.8	49.5	0.1	0.8	1.1
6071001906	42.21	79.06	75-80%	7060 San Bernardino	14	81.2	4.8	49.5	24	11.9	0.3	11.8	2.6
6059099802	42.20	79.05	75-80%	5111 Orange	12.3	68.2	19.5	29.3	19.6	0.9	0.1	48.8	1.3
6037238100	42.19	79.04	75-80%	4626 Los Angeles	12.5	74	13.5	23	1	73.4	0.2	0.6	2
6037120104	42.17	79.03	75-80%	2310 Los Angeles	16.7	78.3	5	69.2	8	5.5	0.1	15.5	1.7
6037237900	42.16	79.01	75-80%	3621 Los Angeles	12.5	72.2	15.3	20.5	1.2	74.6	0.1	0.7	3
6039000506	42.16	79.00	75-80%	6438 Madera	17.3	74	8.7	67.9	26.5	2.2	0.6	1.1	1.8
6067004601	42.16	78.99	75-80%	7614 Sacramento	18.8	73.4	7.8	49.8	18.3	10.5	0.7	17.5	3.2
6107002800	42.15	78.98	75-80%	3395 Tulare	24.5	69	6.5	83.9	14.3	0.3	0.3	0.7	0.4
6037530005	42.14	78.96	75-80%	4346 Los Angeles	7.6	66.7	25.7	35.7	10.9	0.5	0.1	51.3	1.4
6029006202	42.13	78.95	75-80%	6401 Kern	22.9	74	3.1	90.6	6.1	0.8	0.1	1.5	0.9
6107003901	42.12	78.94	75-80%	7184 Tulare	20.2	73.6	6.2	74.9	21	0.4	1.1	1.2	1.4
6037481604	42.11	78.93	75-80%	3942 Los Angeles	9.4	79.6	11	28.2	7.8	1.4	0.1	61.4	1.1
6037604100	42.10	78.91	75-80%	7058 Los Angeles	15	77.9	7.1	64.2	16.5	7	0.4	9.1	2.9
6013314104	42.09	78.90	75-80%	7118 Contra Costa	17.7	74.4	7.9	51.4	20.3	15.5	0.4	9.5	2.9
6029000504	42.08	78.89	75-80%	4086 Kern	13.3	69.1	17.6	20.2	70.7	3.5	1.6	1.8	2.1
6037211201	42.08	78.88	75-80%	2645 Los Angeles	13.6	80.2	6.2	74	7.5	3.3	0.2	13.7	1.4
6107001200	42.07	78.86	75-80%	1337 Tulare	14.9	68.6	16.5	51.5	40.2	2.5	1.1	2.3	2.4
6047000701	42.07	78.85	75-80%	3191 Merced	19.6	69.7	10.7	63.4	29.6	3	0.5	2.3	1.1
6037224310	42.05	78.84	75-80%	2025 Los Angeles	16.3	77	6.7	89.4	4.3	1.6	0	3.9	0.7
6001437101	42.05	78.82	75-80%	6448 Alameda	13.6	74.9	11.5	22.5	13.3	6.1	0.1	53.2	4.8
6107002202	42.04	78.81	75-80%	5542 Tulare	22.4	71.1	6.5	77.4	15.4	4.6	0.4	0.7	1.5
6065040607	42.04	78.80	75-80%	9317 Riverside	18.5	76.5	5	47.9	26.8	9.3	0.2	13.3	2.5
6037550201	42.03	78.79	75-80%	2941 Los Angeles	15.5	76.1	8.4	81.3	9.6	2.3	0.2	5.6	1
6059074801	42.01	78.77	75-80%	5499 Orange	17.1	76.6	6.3	93.2	1.2	2.7	0.3	2.3	0.3
6037277200	42.00	78.76	75-80%	2490 Los Angeles	12.7	82.3	5	30.8	20.5	32.2	0.2	10.3	6
6075012502	42.00	78.75	75-80%	3821 San Francisco	3.6	69.6	26.8	21.1	20	13.9	0.6	41.1	3.3
6001444601	41.99	78.74	75-80%	4761 Alameda	12.5	74.6	12.9	26.3	35.1	4.1	0.4	30.2	3.8
6037120106	41.99	78.72	75-80%	4417 Los Angeles	19.3	75.2	5.5	77.6	4.7	2.1	0.1	14.2	1.3
6037221303	41.98	78.71	75-80%	2551 Los Angeles	14.7	78.4	6.9	76.8	3.4	7.6	0.5	11.1	0.6
6037432602	41.97	78.70	75-80%	4554 Los Angeles	13	76.8	10.2	53.9	6.6	0.4	0.2	38.3	0.7
6029004702	41.96	78.69	75-80%	4051 Kern	21.5	71.6	6.9	96.1	2.5	0.2	0.1	0.6	0.6
6085503113	41.93	78.67	75-80%	4760 Santa Clara	17.8	75.9	6.3	79.7	10.9	1.7	0.6	5.6	1.6
6075017601	41.93	78.66	75-80%	7630 San Francisco	5.6	85.1	9.3	13.6	31.6	12.9	1	36.4	4.5
6037405302	41.93	78.65	75-80%	5351 Los Angeles	12.9	77.1	10	65.2	16.7	2	0.5	13.7	2
6065043517	41.93	78.64	75-80%	6815 Riverside	20.2	75.1	4.7	53.8	26.8	9.6	1	5.8	3.1
6077003308	41.88	78.62	75-80%	1590 San Joaquin	16.9	73.7	9.4	44.5	25.1	13	0.8	12.6	4
6037481603	41.88	78.61	75-80%	3802 Los Angeles	9.4	78.9	11.7	24	5	1	0	69	0.9
6107003001	41.87	78.60	75-80%	4652 Tulare	21.1	72	6.9	82	12.9	2.6	0.3	0.9	1.1
6037404201	41.86	78.58	75-80%	3711 Los Angeles	17	77.6	5.4	76.6	13.1	3.4	0.1	5.6	1.2
6059086602	41.85	78.57	75-80%	6131 Orange	16.1	75.4	8.5	65.3	17.7	2.8	0.2	12.7	1.4
6039000602	41.84	78.56	75-80%	5161 Madera	20	71.9	8.1	88.6	9.4	0.8	0.5	0.2	0.5
6065046200	41.83	78.55	75-80%	3341 Riverside	17.1	71.8	11.1	63.9	18.7	14	0.5	0.9	2
6059001402	41.82	78.53	75-80%	5185 Orange	14.7	75.2	10.1	58	34.4	0.7	0.4	4.7	1.7
6001401000	41.81	78.52	75-80%	5678 Alameda	11.2	80.8	8	14.2	22.3	50.2	0.4	7.6	5.4
6037535803	41.81	78.51	75-80%	4458 Los Angeles	17.3	76.9	5.8	96.3	2.2	0.4	0.2	0.4	0.7
6037302003	41.80	78.50	75-80%	3578 Los Angeles	8.2	75	16.8	12.5	70.8	1.1	0.1	12.5	3
6019003102	41.79	78.48	75-80%	7048 Fresno	17.3	74.9	7.8	40.8	41.3	5.3	1.1	8.7	2.7
6111002300	41.78	78.47	75-80%	7430 Ventura	18.1	77	4.9	70.7	24.2	1.4	0.5	1.6	1.6
6001407200	41.76	78.46	75-80%	6746 Alameda	16.2	75.1	8.7	74.8	6.4	6.7	0.6	10.5	1
6037500700	41.74	78.45	75-80%	6496 Los Angeles	12.3	73.4	14.3	91.9	5.6	0.7	0.2	1.2	0.4
6037603802	41.74	78.43	75-80%	4153 Los Angeles	14.4	78.3	7.3	60.3	12.9	7.6	0.2	16.6	2.3
6067003700	41.73	78.42	75-80%	4219 Sacramento	19.1	74	6.9	50.1	10.8	19	0.7	15.8	3.6
6037541801	41.68	78.41	75-80%	4903 Los Angeles	18.8	76.8	4.4	81.1	1.7	14	0.1	1.9	1.2
6073004100	41.67	78.40	75-80%	6546 San Diego	12.3	82.9	4.8	58	29	6.9	0.4	3.2	2.5
6037602200	41.63	78.38	75-80%	7314 Los Angeles	13.6	78.5	7.9	50.2	26.5	10	0.2	10.3	2.8
6039000603	41.62	78.37	75-80%	5585 Madera	24.7	70.4	4.9	89.5	5.8	3.1	0.3	0.7	0.6
6037402200	41.61	78.36	75-80%	6584 Los Angeles	12.1	72.5	15.4	52.5	27.5	11.6	0.1	6.3	1.9
6071002902	41.59	78.35	75-80%	6584 San Bernardino	17.3	73.3	9.4	75.9	15.3	5.9	0.3	1.8	0.8
6037554104	41.59	78.33	75-80%	2600 Los Angeles	17.1	75.6	7.3	55.3	16	14.3	0.2	12.5	1.7
6029003304	41.58	78.32	75-80%	5248 Kern	5.6	87.9	6.5	43.8	47	6.2	0.4	0.6	2

6099000202	41.57	78.31	75-80%	6593 Stanislaus	18.2	73.2	8.6	29.9	62.9	1.1	0.4	3.3	2.4
6065042520	41.57	78.29	75-80%	4669 Riverside	17.9	73.1	9	69.5	12.3	10.7	0.3	4.9	2.3
6071003900	41.57	78.28	75-80%	5484 San Bernardino	17.7	74.1	8.2	81.3	11.9	4.8	0.3	0.9	0.7
6037530102	41.56	78.27	75-80%	5116 Los Angeles	10.9	68.7	20.4	79.7	12.6	0.3	0.2	6.5	0.8
6071000826	41.56	78.26	75-80%	4075 San Bernardino	14.8	76.3	8.9	49.9	34.8	7.2	0.3	5.7	2.2
6037189101	41.56	78.24	75-80%	2743 Los Angeles	5.7	82.4	11.9	14	66.6	2.8	0.3	12.5	3.9
6037134521	41.54	78.23	75-80%	3126 Los Angeles	18.9	78.9	2.2	90.2	5.2	0.8	0.1	2.8	0.9
6019008402	41.53	78.22	75-80%	1152 Fresno	16.4	75.1	8.5	66.5	31.5	0.3	0.1	1.2	0.4
6037406200	41.53	78.21	75-80%	5678 Los Angeles	12.6	71.3	16.1	60.1	20.6	4.4	0.4	12.7	1.8
6053014500	41.52	78.19	75-80%	4410 Monterey	14.2	69.2	16.6	46.4	42.2	2.4	0.4	6.2	2.5
6065042719	41.52	78.18	75-80%	5025 Riverside	16.4	73.7	9.9	57.7	34.3	4.2	0.5	1.7	1.5
6037201601	41.51	78.17	75-80%	2288 Los Angeles	12.2	75.7	12.1	80.4	4.5	1.5	0.3	12.8	0.6
6071009912	41.50	78.16	75-80%	4762 San Bernardino	16.6	68.4	15	43.7	35.1	14.8	0.7	2.4	3.2
6071003607	41.49	78.14	75-80%	5369 San Bernardino	16.9	74.2	8.9	75.8	11.7	9.3	0.6	1.8	0.8
6037127604	41.49	78.13	75-80%	2939 Los Angeles	14.9	71.4	13.7	53.1	27.8	6.8	0.1	9.3	2.8
6065042624	41.48	78.12	75-80%	3784 Riverside	15.1	77.5	7.4	45.3	31.7	12.4	0.3	6.3	4
6037293307	41.47	78.11	75-80%	2306 Los Angeles	15.7	77.6	6.7	56	15.4	13.1	0.1	12.8	2.5
6077003801	41.46	78.09	75-80%	12552 San Joaquin	17.9	76.6	5.5	38.9	12.6	21.2	0.3	23	4
6111002400	41.45	78.08	75-80%	2571 Ventura	8.4	81	10.6	23.1	67.7	2.6	1.1	1.8	3.7
6085503117	41.45	78.07	75-80%	3120 Santa Clara	17.6	73.8	8.6	58.7	2.5	0.9	0	37.5	0.4
6037212900	41.44	78.06	75-80%	4074 Los Angeles	12.5	79.3	8.2	54.3	6.2	11.8	0	25.9	1.8
6071010011	41.44	78.04	75-80%	5221 San Bernardino	19.3	73.5	7.2	58.2	29.6	8	0.4	1.9	1.9
6065041411	41.43	78.03	75-80%	3187 Riverside	15.2	73.1	11.7	81	14.5	1.5	0.5	1.8	0.8
6047000503	41.43	78.02	75-80%	3292 Merced	9.8	82.8	7.4	40	35.7	14.9	2.1	5.3	2
6077003312	41.42	78.00	75-80%	3220 San Joaquin	23.4	68.9	7.7	58.8	8.9	11.6	0.5	17.1	3.1
6077003500	41.42	77.99	75-80%	20177 San Joaquin	16.1	73.7	10.2	26.2	24.3	6.4	0.3	38.8	3.9
6013313102	41.39	77.98	75-80%	3984 Contra Costa	15.4	74.5	10.1	35.5	25	23.7	0.7	11.2	3.9
6071004601	41.38	77.97	75-80%	7032 San Bernardino	17.3	77.9	4.8	48	27.2	17.6	0.5	4.1	2.7
6077001400	41.37	77.95	75-80%	4425 San Joaquin	12.8	66.7	20.5	33.6	40.4	3.6	0.6	18.6	3.2
6013309000	41.37	77.94	75-80%	2771 Contra Costa	13.3	77.9	8.8	29.2	24.7	33	0.3	8.5	4.3
6081602100	41.37	77.93	75-80%	3615 San Mateo	16.2	76.6	7.2	72.4	9	1.9	0.4	14.1	2.1
6085501501	41.36	77.92	75-80%	4278 Santa Clara	18.2	75.7	6.1	66.7	5.1	1.6	0.1	25.2	1.3
6071000821	41.36	77.90	75-80%	3478 San Bernardino	15.1	81.2	3.7	40	31.9	14.3	0.2	10.9	2.7
6037120105	41.35	77.89	75-80%	2812 Los Angeles	14.3	73.8	11.9	72.7	10	1.8	0.1	14.4	1.1
6073002502	41.35	77.88	75-80%	6264 San Diego	15.8	76.9	7.3	50.5	23.2	11.4	0.5	11.7	2.7
6071004401	41.35	77.87	75-80%	4383 San Bernardino	16.4	75.2	8.4	74.9	14.1	7	0.1	2.7	1.3
6059087401	41.35	77.85	75-80%	3954 Orange	14.5	79.4	6.1	64.7	19.3	1.6	0.1	13.1	1.2
6001401600	41.35	77.84	75-80%	2163 Alameda	13.1	81.7	5.2	20.8	16.2	46.5	0.7	12	3.9
6067009006	41.34	77.83	75-80%	4940 Sacramento	13.6	76.7	9.7	20.9	50.5	12.1	0.6	10.5	5.5
6099000404	41.32	77.82	75-80%	5564 Stanislaus	13.6	72	14.4	24	57.4	3.8	0.4	10.3	4.2
6067005102	41.30	77.80	75-80%	4481 Sacramento	13.3	68.2	18.5	26	37.8	10.1	0.8	21.1	4.2
6071010802	41.27	77.79	75-80%	5338 San Bernardino	11.6	75.4	13	17.9	73.7	2	0.8	1.6	4
6029004701	41.27	77.78	75-80%	8868 Kern	20.2	76.2	3.6	89.1	7.6	1.8	0.1	0.6	0.7
6077005132	41.26	77.77	75-80%	3257 San Joaquin	17.2	73.9	8.9	49.3	42.4	2.7	1	2.1	2.5
6077003305	41.25	77.75	75-80%	3704 San Joaquin	12.8	68.2	19	34.8	44.3	6.5	0.5	10	3.9
6071001707	41.25	77.74	75-80%	5966 San Bernardino	15.6	77.4	7	70.5	14.3	4.7	0.3	8.6	1.6
6065042518	41.24	77.73	75-80%	3670 Riverside	18.2	77	4.8	54.3	15.7	21.8	0.3	5.8	2
6037554600	41.23	77.71	75-80%	4374 Los Angeles	11.1	76.3	12.6	43	17.4	4.4	0.2	33.6	1.3
6059099904	41.22	77.70	75-80%	6352 Orange	14.1	76.4	9.5	37	15.6	0.6	0.1	44.3	2.3
6073003404	41.20	77.69	75-80%	4634 San Diego	18	74.9	7.1	62.2	2.8	16.6	0.1	16.5	1.8
6029003115	41.19	77.68	75-80%	5482 Kern	19.7	74.7	5.6	65.2	18.6	9.9	0.4	3.6	2.4
6037552700	41.18	77.66	75-80%	6985 Los Angeles	14.6	77.2	8.2	73.8	12.2	2.6	0.2	10.1	1.1
6047000401	41.17	77.65	75-80%	1834 Merced	17.3	72.5	10.2	39	57	1.2	0.3	0.7	1.8
6037294301	41.17	77.64	75-80%	2448 Los Angeles	13.9	75.6	10.5	81.7	8.9	1.3	0	6.8	1.2
6065042007	41.17	77.63	75-80%	4339 Riverside	11.2	75.5	13.3	28.7	62.7	2.3	0.5	2.9	2.9
6071000403	41.15	77.61	75-80%	4678 San Bernardino	12.6	75.9	11.5	55.7	34.4	1.4	0.4	6.6	1.5
6037195803	41.14	77.60	75-80%	2603 Los Angeles	8.4	82.2	9.4	47.7	32.7	1.6	0.5	15.7	1.9
6013313101	41.13	77.59	75-80%	7251 Contra Costa	15.1	70.7	14.2	39.2	22.1	20.2	0.2	15	3.3
6071001311	41.13	77.58	75-80%	3236 San Bernardino	13.8	78.8	7.4	38.9	24.8	9.9	0.3	23	3.2
6025012001	41.11	77.56	75-80%	3831 Imperial	15	69.5	15.5	98.4	1.3	0	0.1	0.2	0.1
6047002600	41.11	77.55	75-80%	5319 Merced	16.8	73.7	9.5	38.3	42.8	3.3	0.4	12.3	3
6037238400	41.08	77.54	75-80%	4497 Los Angeles	10.5	69.9	19.6	17.6	0.9	78.8	0.3	0.6	1.8
6037501002	41.08	77.53	75-80%	4861 Los Angeles	13.1	75.7	11.2	81.5	14.9	0.5	0.2	1.8	1.1
6071012700	41.08	77.51	75-80%	4052 San Bernardino	15.2	80	4.8	51.4	27.7	9.9	0.1	8.1	2.8
6037404803	41.06	77.50	75-80%	1741 Los Angeles	14.4	74.5	11.1	78.3	8.8	1.4	0.3	10.1	1.1
6037119320	41.05	77.49	75-80%	4694 Los Angeles	17.3	77.7	5	69.6	6.8	4.3	0.1	17.7	1.5
6065041004	41.04	77.48	75-80%	4590 Riverside	17.9	77.3	4.8	61	26.8	4.1	0.3	5.6	2.2
6107002304	41.03	77.46	75-80%	1740 Tulare	16.9	68.3	14.8	42.8	48.4	4.1	0.5	0.6	3.6
6037234000	41.03	77.45	75-80%	5335 Los Angeles	10.9	74.4	14.7	31.4	2.9	60	0.2	2	3.5
6037534802	41.01	77.44	75-80%	2875 Los Angeles	15.8	75.8	8.4	96.4	2.1	0.3	0	0.9	0.3
6037530006	40.99	77.42	75-80%	3963 Los Angeles	13.9	74.9	11.2	64.5	13.4	0.8	0	20.2	1
6037530204	40.96	77.41	75-80%	3682 Los Angeles	16	75	9	89.3	5.9	0.5	0.3	3.6	0.4
6065043507	40.95	77.40	75-80%	6700 Riverside	18.9	69.7	11.4	50.6	38.5	6.6	0.6	1.2	2.5
6001425104	40.94	77.39	75-80%	3175 Alameda	7.7	82	10.3	13.2	34	24.7	0.3	21.2	6.6
6037134800	40.94	77.37	75-80%	5949 Los Angeles	11.5	77.4	11.1	46.7	33.5	3.7	0.3	12.9	2.9
6107000600	40.93	77.36	75-80%	6200 Tulare	21.8	72.1	6.1	92.3	5.6	0.1	0.1	1.3	0.6
6037115302	40.89	77.35	75-80%	4351 Los Angeles	17.3	77.3	5.4	79.4	10.8	1.6	0.1	6.9	1.2
6037104203	40.88	77.34	75-80%	5210 Los Angeles	19.1	74.1	6.8	90.4	1.3	6.1	0.2	1.4	0.7
6037134001	40.87	77.32	75-80%	3765 Los Angeles	16.2	78.4	5.4	75.4	8.9	2.7	0	12.1	0.9
6077004902	40.86	77.31	75-80%	6106 San Joaquin	13.1	74.6	12.3	32.5	64.3	0.5	0.5	1.1	1.1
6099002902	40.84	77.30	75-80%	7609 Stanislaus	15.5	73.2	11.3	41.5	53	0.6	0.7	2	2.1
6059086701	40.83	77.29	75-80%	8876 Orange	15.1	73.8	11.1	56.6	22.8	2.2	0.2	16.7	1.5
6059087504	40.83	77.27	75-80%	7141 Orange	20.2	75.6	4.2	81.1	9.1	1	0.4	7.5	1
6019004505	40.82	77.26	75-80%	4866 Fresno	15.1	71.6	13.3	40.3	37.8	11.2	0.7	6.9	3.1
6037500300	40.81	77.25	75-80%	2903 Los Angeles	9.4	77.1	13.5	58.7	23	1.7	0.1	14.6	1.8
6025010500	40.81	77.24	75-80%	6593 Imperial	18	73.9	8.1	76.7	19	1.6	0.5	1	1.1
6071010300	40.78	77.22	75-80%	3846 San Bernardino	12.8	73.2	14	32.9	59.5	2.3	0.9	2	2.4
6019003803	40.78	77.21	75-80%	8153 Fresno	17.5	73.1	9.4	42.5	29.3	5.3	0.7	19	3.1
6099001002	40.78	77.20	75-80%	3153 Stanislaus	13.4	71.2	15.4	27.1	61.1	3	1	3.7	4.1
6031000500	40.77	77.19	75-80%	5476 Kings	17.5	73.5	9	59.2	34.4	2.2	0.6	2	1.5
6031001402	40.75	77.17	75-80%	2384 Kings	19.4	70.9	9.7	82	13.8	2.1	0.5	0.4	1.2
6037127300	40.75	77.16	75-80%	4460 Los Angeles	11.4	78.4	10.2	49	29.8	7.9	0.3	10	3.1
6037552002	40.75	77.15	75-80%	3721 Los Angeles	14.7	77.3	8	70.2	9.2	6.3	0.4	12.3	1.6
6065041102	40.74	77.13	75-80%	4185 Riverside	16.9	76.6	6.5	74.6	18.8	1.4	0.4	3.9	0.9
6065048902	40.74	77.12	75-80%	5957 Riverside	17	76.3	6.7	66.4	14.1	13.5	0.2	3.7	2.1
6059001802	40.74	77.11	75-80%	7154 Orange	16	77.5	6.5	60.9	22.9	3.4	0.3	11	1.5
6037187101	40.73	77.10	75-80%	3235 Los Angeles	9.2	75.6	15.2	45.1	26.3	1.1	0.3	24.4	2.7
6059074501	40.72	77.08	75-80%	6880 Orange	22	74.5	3.5	87.9	1.1	0.1	0.2	9.9	0.7
6037408623	40.72	77.07	75-80%	3023 Los Angeles	9	74.4	16.6	32.8	13.1	2.6	0.2	48.8	2.4
6099000801	40.70	77.06	75-80%	6216 Stanislaus	10.2	67.3	22.5	21.5	68.9	2.5	0.5	3.5	3.1
6037127603	40.70	77.05	75-80%	2938 Los Angeles	16	79.1	4.9	74.5	14	4.3	0.3	5.8	1.1
6037432401	40.69	77.03	75-80%	3789 Los Angeles	13.7	74.4	11.9	52.3	6.7	0.4	0.3	39.7	0.6
6037302102	40.69	77.02	75-80%	6439 Los Angeles	8.9	77	14.1	21.6	56.5	1.4	0.1	18	2.4
6037531603	40.67	77.01	75-80%	3568 Los Angeles	17.8	73.9	8.3	97.7	1.3	0.1	0.3	0.5	0.1
6037212701	40.66	77.00	75-80%	2430 Los Angeles	9	73.3	17.7	29.5	8	5.4	0	55.4	1.6
6067000800	40.66	76.98	75-80%	1425 Sacramento	2	69.3	28.7	14.6	67.9	4.4	0.2	9.9	2.9
6037482401	40.66	76.97	75-80%	3761 Los Angeles	12.1	76.2	11.7	37.6	2.7	0.2	0.1	58.6	0.9
6019005409	40.65	76.96	75-80%	3560 Fresno	11.1	79.2	9.7	33.5	42.4	11.3	0.4	8.8	3.5
6037213100	40.64	76.95	75-80%	2721 Los Angeles	11.2	75.5	13.3	31.8	6.6	12	0	47.7	1.9
6001407400	40.62	76.93	75-80%	3954 Alameda	16.4	77.3	6.3	64.9	3.4	19.9	0.3	9.9	1.7
6037134710	40.62	76.92	75-80%	5287 Los Angeles	16.8	77.6	5.6	69	14	3.2	0.2	11.7	2
6019001413	40.61	76.91	75-80%	4605 Fresno	18.4	72.1	9.5	36.1	31.2	2.8	0.4	27.5	1.8
6085505202	40.60	76.89	75-80%	5867 Santa Clara	15.9	75.6	8.5	41.6	25	3.9	0.4	25.8	3.4
6037213402	40.60	76.88	75-80%	4645 Los Angeles	13.1	80.2	6.7	73.8	4	2.4	0.2	18.8	0.8
6075023300	40.59	76.87	75-80%	2624 San Francisco	12.1	76.2	11.7	21	2.6	10.8	0.5	63.1	2
6059076204	40.56	76.86	75-80%	4492 Orange	16.9	77.9	5.2	68.8	21.1	1	0.3	7.3	1.4
6037123800	40.56	76.84	75-80%	5531 Los Angeles	11.1	78	10.9	27	60.4	4.4	0.3	5.2	2.7
6029005103	40.55	76.83	75-80%	2564 Kern	11.5	64.8	23.7	9.5	85.2	0.3	1.3	1.6	2.1
6037601202	40.54	76.82	75-80%	4115 Los Angeles	14.3	78	7.7	90	3	5.1	0.1	1.5	0.3
6073010009	40.54	76.81	75-80%	6693 San Diego	17.5	76.8	5.7	91	3	2.5	0	2.9	0.6
6037133100	40.54	76.79	75-80%	5446 Los Angeles	10.7	69	20.3	33.1	50.5	3.7	0.2	8.8	3.8
6059074901	40.54	76.78	75-80%	9170 Orange	19.5	73.7	6.8	94.5	1.6	0.2	0.2	3.2	0.4
6059075201	40.53	76.77	75-80%	5822 Orange	17.7	76.2	6.1	92.3	1.9	1	0.3	4.1	0.3

6065041407	40.51	76.76	75-80%	5830 Riverside	17	73.4	9.6	64.2	22.1	6	0.3	5.7	1.7
6107001003	40.50	76.74	75-80%	19732 Tulare	19.6	74.6	5.8	48.4	40.1	1.5	0.4	7.7	2
6071006603	40.50	76.73	75-80%	4958 San Bernardino	15.5	74.4	10.1	80.2	11.4	4.7	0.1	2.4	1.3
6037134305	40.50	76.72	75-80%	3847 Los Angeles	18.6	77.4	4	77.6	8.6	2.7	0	10.1	1.1
6037234200	40.47	76.71	75-80%	2376 Los Angeles	8.6	67	24.4	11.8	2.9	70.7	0.3	10.4	3.9
6071002901	40.46	76.69	75-80%	4446 San Bernardino	19.2	75.2	5.6	81.3	12.1	4.6	0.1	1	1
6071000823	40.45	76.68	75-80%	6658 San Bernardino	15.6	77	7.4	47.9	30.5	10.8	0.3	7.8	2.7
6065045707	40.44	76.67	75-80%	6397 Riverside	19.4	74.9	5.7	96.4	2.5	0.3	0	0.4	0.4
6019007400	40.42	76.66	75-80%	3548 Fresno	16.9	73.7	9.4	67.8	30.5	0.1	0.4	0.5	0.7
6099002605	40.42	76.64	75-80%	3855 Stanislaus	14.8	73.9	11.3	48.3	45	1.5	0.5	2.3	2.3
6037277400	40.40	76.63	75-80%	1533 Los Angeles	15.4	79.8	4.8	22.9	8.2	53.9	0	11	4
6047000303	40.40	76.62	75-80%	2158 Merced	16.4	71.4	12.2	48.4	45.1	0.4	1.2	3.8	1.2
6099003202	40.39	76.60	75-80%	16007 Stanislaus	18.2	76.1	5.7	53.6	28.3	6.9	0.5	7.5	3.3
6071010025	40.38	76.59	75-80%	7405 San Bernardino	17.7	70.9	11.4	46.3	33.2	12.7	0.6	3.9	3.3
6077004308	40.37	76.58	75-80%	3870 San Joaquin	18.4	75.6	6	52.7	33	1	0.7	9.2	3.4
6037195903	40.37	76.57	75-80%	2216 Los Angeles	7.2	85.1	7.7	51	22.4	3.2	0.3	21.4	1.8
6037408133	40.35	76.55	75-80%	5739 Los Angeles	14.1	77	8.9	51	6.1	3.8	0.3	36.7	2.1
6077005206	40.34	76.54	75-80%	16787 San Joaquin	19.4	75.2	5.4	24.3	34.5	7.1	0.3	28.4	5.4
6037554801	40.33	76.53	75-80%	3366 Los Angeles	14.9	76.7	8.4	76.2	7.6	2.5	0.1	11.9	1.7
6037211420	40.32	76.52	75-80%	3859 Los Angeles	11.6	79.1	9.3	52	9.3	3.7	0.1	33.8	1.2
6059099402	40.32	76.50	75-80%	8090 Orange	18.7	76.7	4.6	70.2	20.7	0.5	0.1	7	1.4
6037294200	40.31	76.49	75-80%	4951 Los Angeles	15.9	74.8	9.3	87.7	6.5	0.9	0.3	3.2	1.4
6037900300	40.30	76.48	75-80%	4514 Los Angeles	14.5	77.3	8.2	37.8	42	12.3	0.6	4.4	2.9
6037191302	40.29	76.47	75-80%	2422 Los Angeles	9.6	81.1	9.3	47.5	20.6	3.3	0.2	26.5	1.8
6065040405	40.29	76.45	75-80%	5353 Riverside	12.1	76	11.9	43.9	45.8	3.3	0.4	4.9	1.8
6037543321	40.27	76.44	75-80%	5418 Los Angeles	10.7	74.3	15	13.8	8.8	61.4	0.1	12.6	3.4
6037540202	40.26	76.43	75-80%	6845 Los Angeles	17.6	74	8.4	87.3	3.5	7.5	0.1	1.2	0.5
6037432402	40.25	76.42	75-80%	6310 Los Angeles	15.1	74.7	10.2	61.6	6.3	0.7	0.2	30.3	0.9
6067009601	40.23	76.40	75-80%	6621 Sacramento	17	75.3	7.7	24.3	10.6	23.9	0.2	35.7	5.3
6001402700	40.23	76.39	75-80%	1569 Alameda	13.7	79.7	6.6	15.5	12.7	56.2	0.1	10.3	5.3
6037222100	40.19	76.38	75-80%	3877 Los Angeles	14.5	77.2	8.3	67.8	3.4	23.9	0.1	2.6	2.2
6037571703	40.18	76.37	75-80%	3667 Los Angeles	16.4	70.5	13.1	59.3	8	14.8	0.1	15.5	2.2
6073003305	40.17	76.35	75-80%	5738 San Diego	18	74.1	7.9	56.4	2.2	30.6	0	8.8	2
6071000606	40.17	76.34	75-80%	4374 San Bernardino	17.2	76.7	6.1	69.8	18.3	3.2	0.5	7	1.2
6029001901	40.17	76.33	75-80%	3434 Kern	15.5	74.5	10	40	48.4	4.4	0.9	3.3	2.9
6037576903	40.16	76.31	75-80%	3802 Los Angeles	16.5	80.3	3.2	58.2	12.9	16.4	0.3	9.1	3
6037221210	40.15	76.30	75-80%	3300 Los Angeles	13.6	79.1	7.3	81.4	2.8	5	0.2	9.4	1.2
6025010700	40.14	76.29	75-80%	4322 Imperial	18	69.7	12.3	94.1	3.2	1.9	0.3	0.1	0.4
6071001200	40.13	76.28	75-80%	4730 San Bernardino	14.5	76.3	9.2	56.7	37.1	2.5	0.2	1.6	1.9
6071006100	40.12	76.26	75-80%	8346 San Bernardino	15.7	73.8	10.5	47	34.2	13.2	0.4	3	2.3
6037320201	40.11	76.25	75-80%	3756 Los Angeles	17.8	74.9	7.3	94	4.6	0.6	0.2	0.2	0.3
6037503105	40.11	76.24	75-80%	3634 Los Angeles	15.5	77.9	6.6	75.6	14.4	2.3	0.2	6.1	1.3
6037209820	40.11	76.23	75-80%	2968 Los Angeles	16.6	78.2	5.2	86.2	2	3.8	0.1	6.6	1.3
6037294110	40.11	76.21	75-80%	4140 Los Angeles	15.1	75.5	9.4	86.3	6.4	1.2	0.1	5	0.9
6075012301	40.11	76.20	75-80%	2734 San Francisco	4.7	75.4	19.9	21.9	31.7	11.6	0.6	31	3.3
6077003407	40.10	76.19	75-80%	2914 San Joaquin	21.4	68	10.6	36.8	15.8	15.3	0.4	27.6	4.3
6037481401	40.09	76.18	75-80%	6061 Los Angeles	9	78.3	12.7	16.1	5.2	0.2	0.1	78	0.5
6073022000	40.08	76.16	75-80%	4186 San Diego	14.5	74.6	10.9	52.2	7.5	3.3	0.2	34.4	2.4
6037431100	40.08	76.15	75-80%	6629 Los Angeles	14.2	76.9	8.9	61.2	14.2	13.2	0.2	9	2.2
6037502003	40.07	76.14	75-80%	2693 Los Angeles	15.1	77.5	7.4	84.5	11.8	0.7	0.8	1.2	1
6059087806	40.06	76.13	75-80%	5702 Orange	16.8	76.7	6.5	61.7	16	1.6	0.4	18.6	1.7
6059087901	40.06	76.11	75-80%	3638 Orange	13.3	70.9	15.8	44.9	19.3	1.6	0.5	31.8	1.9
6071002207	40.05	76.10	75-80%	4461 San Bernardino	6.1	91.4	2.5	48.4	24.8	22.2	0.1	2.1	2.4
6037310800	40.05	76.09	75-80%	4909 Los Angeles	10.1	75.9	14	30.1	54	2	0.3	10.3	3.3
6013364002	40.04	76.08	75-80%	5518 Contra Costa	12.8	74.2	13	37.5	28.8	12.7	0.3	17.4	3.3
6037104204	40.03	76.06	75-80%	3375 Los Angeles	15.6	76.7	7.7	73.5	10.2	7.4	0.1	8	0.8
6087110300	39.99	76.05	75-80%	6710 Santa Cruz	20.8	74.3	4.9	92	5.2	0.2	0.3	1.3	0.9
6065041302	39.99	76.04	75-80%	4303 Riverside	19.3	75.4	5.3	81.6	11	1.9	0.5	4.2	0.8
6037544002	39.98	76.02	75-80%	3142 Los Angeles	14	76.1	9.9	62.2	12.3	4.5	0.1	18.7	2.3
6065045502	39.98	76.01	75-80%	3744 Riverside	18.6	72	9.4	84.3	12.2	1.1	0.3	1	1
6013392200	39.97	76.00	75-80%	10605 Contra Costa	13.2	77.5	9.3	37.1	15.8	18.2	0.2	25.5	3.1
6059110302	39.97	75.99	75-80%	6033 Orange	12	76.8	11.2	46.5	28.5	1.5	0.3	20.8	2.4
6037134522	39.97	75.97	75-80%	3954 Los Angeles	17.7	77.3	5	70	15.5	5	0.2	7.7	1.7
6067004401	39.97	75.96	75-80%	4122 Sacramento	16	74	10	40	21.9	16.8	0.7	16	4.8
6095251802	39.96	75.95	75-80%	2538 Solano	12.1	64.4	23.5	24.9	24	23.2	0.3	23.8	3.7
6001422000	39.95	75.94	75-80%	1756 Alameda	9.1	82.5	8.4	12.6	43.3	28	0.2	10	5.9
6029006401	39.95	75.92	75-80%	8320 Kern	20.7	73.8	5.5	95.1	4	0.1	0.2	0.5	0.2
6013302005	39.94	75.91	75-80%	6592 Contra Costa	15.6	74.5	9.9	39.1	46.2	6.8	0.8	3.4	3.7
6071003401	39.93	75.90	75-80%	7502 San Bernardino	17	76.9	6.1	79	14	4.2	0.2	1.7	0.8
6065043005	39.93	75.89	75-80%	5049 Riverside	16.4	76.5	7.1	52.1	39	3.3	0.4	3	2.3
6065042521	39.92	75.87	75-80%	4922 Riverside	17.8	76.4	5.8	64.5	12.9	15	0.3	5	2.2
6097153200	39.90	75.86	75-80%	7522 Sonoma	16.9	77.5	5.6	49.2	35	2.8	1.1	8.8	3.1
6037113422	39.90	75.85	75-80%	6057 Los Angeles	12.8	77.9	9.3	42.2	31.6	5.6	0.1	17.6	2.9
6107001601	39.90	75.84	75-80%	5587 Tulare	21	71.9	7.1	85.8	12.8	0.1	0.5	0.1	0.8
6029002814	39.90	75.82	75-80%	4158 Kern	17.6	71.2	11.2	47.4	34.2	11.2	0.3	4.6	2.3
6037106520	39.90	75.81	75-80%	5837 Los Angeles	15.4	75.3	9.3	85.4	11.3	1.1	0.3	1.2	0.6
6037407601	39.89	75.80	75-80%	4366 Los Angeles	16.1	77.1	6.8	84.2	4	1.1	0.3	9.7	0.8
6037296902	39.89	75.79	75-80%	3851 Los Angeles	14.1	75.3	10.6	54	32.8	6.6	0.2	4.2	2.1
6019003804	39.89	75.77	75-80%	5531 Fresno	16	77.7	6.3	47.3	23.6	9.3	0.4	16.4	2.9
6059011714	39.88	75.76	75-80%	499 Orange	14.4	83.4	2.2	70.9	19	2	0	6.8	1.2
6071002606	39.88	75.75	75-80%	7089 San Bernardino	17.1	78.6	4.3	68.3	11	12.6	0.3	5.9	1.9
6037212304	39.87	75.73	75-80%	1804 Los Angeles	12.9	78.7	8.4	67.9	10	4.7	0.3	15.9	1.3
6037143200	39.86	75.72	75-80%	3743 Los Angeles	8.1	85	6.9	18.8	61	7.9	0.2	8.1	3.9
6037543702	39.85	75.71	75-80%	7083 Los Angeles	13.9	76.4	9.7	52	10	4.7	0.3	30.8	2.2
6037408631	39.85	75.70	75-80%	5087 Los Angeles	11.9	76	12.1	55.5	11.8	1.2	0.4	29.9	1.2
6037603703	39.80	75.68	75-80%	2703 Los Angeles	12.9	76.1	11	42.8	26.4	7.8	0.1	19.8	3.1
6039000400	39.79	75.67	75-80%	1288 Madera	17.5	73.3	9.2	66.1	32	0.7	0.5	0.3	0.4
6073005200	39.76	75.66	75-80%	4563 San Diego	3.7	86.4	9.9	20	52.4	13	0.9	8.7	5.1
6037301900	39.76	75.65	75-80%	7810 Los Angeles	9.3	71.3	19.4	14	64.2	1.6	0.1	16.1	4
6107002100	39.76	75.63	75-80%	2499 Tulare	19.3	72.5	8.2	56.3	40.6	0.2	0.9	0.7	1.3
6029003500	39.73	75.62	75-80%	6156 Kern	15.7	73	11.3	26.2	67.6	0.8	1	2.3	2.1
6037530003	39.70	75.61	75-80%	2983 Los Angeles	8.7	66.4	24.9	58.1	22.3	0.1	0.1	17.8	1.6
6037601001	39.70	75.60	75-80%	2154 Los Angeles	8.7	67.8	23.5	19.4	3.7	70.8	0.2	2.7	3.2
6073012600	39.69	75.58	75-80%	5047 San Diego	15.2	73.9	10.9	75.6	15.3	2.7	0.4	3.9	2.1
6071003803	39.69	75.57	75-80%	4732 San Bernardino	17.4	74.9	7.7	74.6	11.9	10.6	0.2	1.3	1.5
6001405401	39.68	75.56	75-80%	3957 Alameda	10.8	80.9	8.3	21	11.6	19.3	0.4	44.3	3.5
6001440301	39.68	75.55	75-80%	7312 Alameda	14.6	75.9	9.5	34.5	17.7	5.7	0.2	37.4	4.5
6099002701	39.67	75.53	75-80%	3811 Stanislaus	12.7	75.9	11.4	44.2	44.1	1.9	0.8	6.2	2.8
6059088501	39.67	75.52	75-80%	6785 Orange	16.2	75.8	8	53.2	16.1	0.7	0.2	27.8	1.8
6073003303	39.66	75.51	75-80%	4193 San Diego	20.8	74.9	4.3	71	4.2	14.6	0.2	7.9	2.1
6059001201	39.65	75.50	75-80%	5505 Orange	18.8	75.4	5.8	80.6	12.5	1.7	0.2	3.5	1.3
6001406201	39.64	75.48	75-80%	4649 Alameda	16	77.8	6.2	49.2	3.1	15.5	0.3	30.7	1.3
6037115404	39.63	75.47	75-80%	2913 Los Angeles	12.4	77.8	9.8	51.4	24.3	7.1	0.1	14.3	2.8
6031001701	39.63	75.46	75-80%	9142 Kings	21.5	73.9	4.6	91.1	6.9	0.5	0.2	0.6	0.6
6071006201	39.62	75.44	75-80%	3583 San Bernardino	16.9	74.1	9	58.6	26.8	10.4	0.4	1.7	2.1
6081604200	39.61	75.43	75-80%	4170 San Mateo	14.3	78	7.7	56.9	14.9	0.9	0.5	23.1	3.7
6077003406	39.60	75.42	75-80%	3700 San Joaquin	19.3	68.7	12	33.9	13.6	16.5	0.3	29.9	5.7
6065042517	39.60	75.41	75-80%	3278 Riverside	17.1	77.4	5.5	62.6	15.9	14.2	0.1	5.1	2.2
6037131020	39.60	75.39	75-80%	5698 Los Angeles	14.1	78.8	7.1	62.9	21.3	2.7	0.1	11.1	2
6095251901	39.57	75.38	75-80%	5072 Solano	11.9	71.9	16.2	21.2	18.1	32.4	0.3	22.6	5.4
6059088802	39.57	75.37	75-80%	5551 Orange	15.1	75.9	9	32.2	14.9	1	0	50.5	1.4
6107000301	39.57	75.36	75-80%	6717 Tulare	16.1	71.8	12.1	57.2	39.5	0.3	0.3	1.7	1.1
6071004603	39.54	75.34	75-80%	5717 San Bernardino	15.2	76.2	8.6	45.7	30.7	15.1	0.5	5.4	2.6
6053014102	39.54	75.33	75-80%	2259 Monterey	19.9	76.2	3.9	28.3	31.7	15.4	0.4	15.9	8.3
6037404301	39.53	75.32	75-80%	5665 Los Angeles	16.7	75	8.3	86.7	7.3	1.8	0.3	3.2	0.6
6037199120	39.52	75.31	75-80%	4086 Los Angeles	15	71.2	13.8	72.5	2.4	1.1	0.4	23	0.6
6037197200	39.52	75.29	75-80%	3757 Los Angeles	11.1	75.6	13.3	54.5	3.3	0.6	0.2	40.2	1.1
6037550202	39.52	75.28	75-80%	5496 Los Angeles	12.8	77	10.2	71.5	15.5	3.9	0.4	6.9	1.7
6037503902	39.52	75.27	75-80%	4636 Los Angeles	12.5	74	13.5	44.7	39.9	2.2	0.2	11	2
6071001804	39.51	75.26	75-80%	5145 San Bernardino	14.3	80.2	5.5	56.6	20.5	6.7	0.2	14.2	1.7
6037117408	39.51	75.24	75-80%	2830 Los Angeles	18.5	77.7	3.8	82.5	7.1	4.6	0	4.2	1.6
6073002501	39.50	75.23	75-80%	5504 San Diego	17.1	76.6	6.3	61.9	11.6	8.8	0.1	15.3	2.2
6099000807	39.50	75.22	75-80%	3694 Stanislaus	11.8	68.2	20	33.1	51	2.7	0.5	9.1	3.6

6047001902	39.48	75.20	75-80%	2572 Merced	16.1	72.6	11.3	68.6	28.7	0.5	0.2	1.2	0.8
6077005106	39.46	75.19	75-80%	6017 San Joaquin	15.9	74.7	9.4	32.6	48.7	4.8	0.5	9.2	4.2
6065049500	39.46	75.18	75-80%	8421 Riverside	21.9	71.2	6.9	89.6	7.4	1	0.3	1.2	0.5
6077000401	39.45	75.17	75-80%	3043 San Joaquin	13	74.3	12.7	38.1	43.5	7.7	1.1	5.1	4.6
6037432300	39.44	75.15	75-80%	3951 Los Angeles	12.7	75.9	11.4	52.8	10.3	0.4	0.1	35.1	1.3
6037481103	39.43	75.14	75-80%	5350 Los Angeles	10.9	74	15.1	39.3	5.9	0.4	0.2	53	1.2
6037219500	39.43	75.13	75-80%	1737 Los Angeles	10	68	22	19.4	3.6	54.6	0.2	18.9	3.3
6019004212	39.42	75.12	75-80%	10762 Fresno	17	76.8	6.2	37.7	36.5	10.7	0.7	11.2	3.3
6037650901	39.42	75.10	75-80%	5928 Los Angeles	11.5	77.9	10.6	31.7	42.9	2.5	0.2	18.6	4.1
6037553000	39.41	75.09	75-80%	4825 Los Angeles	13.8	77.5	8.7	69.9	17.6	3.7	0.2	7.4	1.3
6019004001	39.41	75.08	75-80%	7248 Fresno	20.1	72.9	7	65.8	25.7	0.4	0.5	6.3	1.3
6059063604	39.41	75.07	75-80%	3835 Orange	14.9	73.7	11.4	57.7	35.9	0.8	0.1	4	1.5
6037543604	39.40	75.05	75-80%	5620 Los Angeles	11.6	73.1	15.3	34.6	9.1	5.3	0.1	47.8	3.1
6037302004	39.39	75.04	75-80%	4214 Los Angeles	8.2	77.1	14.7	15.7	61.3	1.1	0.1	17.5	4.3
6065042409	39.38	75.03	75-80%	3299 Riverside	15.7	78	6.3	52.3	24.1	17.5	0.2	3.5	2.4
6001437200	39.37	75.02	75-80%	6755 Alameda	12.2	72.4	15.4	27.1	22.8	12	0.3	33.2	4.6
6037310701	39.35	75.00	75-80%	2361 Los Angeles	7.6	69.8	22.6	16.4	66.1	1.5	0.1	12.1	3.8
6029001801	39.35	74.99	70-75%	5579 Kern	14.7	71.5	13.8	39.7	43.9	9.6	0.5	3.8	2.5
6037117520	39.34	74.98	70-75%	4052 Los Angeles	21.2	76.6	2.2	86	3.8	4.1	0.1	5.2	0.8
6071009913	39.33	74.97	70-75%	6068 San Bernardino	17.3	69.3	13.4	53.3	29.3	12.4	0.5	1.7	2.9
6037222700	39.32	74.95	70-75%	3748 Los Angeles	0.1	99.8	0.1	11.6	46.6	4.2	0	31.7	5.9
6065043001	39.32	74.94	70-75%	5593 Riverside	15.8	76.8	7.4	60.1	32.5	3.2	0.3	1.7	2.1
6065041405	39.32	74.93	70-75%	4096 Riverside	15.3	77.4	7.3	58.8	32	2.7	0.4	4.3	1.8
6099003500	39.31	74.91	70-75%	10720 Stanislaus	17.8	73.6	8.6	61.4	32.9	2	0.4	1.7	1.6
6037535804	39.30	74.90	70-75%	5498 Los Angeles	18	77.5	4.5	97.5	1.7	0.3	0.1	0.1	0.3
6071002101	39.30	74.89	70-75%	4399 San Bernardino	16.9	76.5	6.6	65.1	17.9	9.9	0.4	4.8	1.8
6073010013	39.27	74.88	70-75%	5484 San Diego	15.8	73.5	10.7	97.3	1.7	0.3	0.1	0.3	0.2
6081602200	39.27	74.86	70-75%	8084 San Mateo	14.8	76.8	8.4	66.6	14.4	2.6	0.2	13.4	2.7
6001428700	39.27	74.85	70-75%	4119 Alameda	18.2	76.4	5.4	12	34.8	14.2	1	31.2	6.7
6099000203	39.25	74.84	70-75%	8756 Stanislaus	13.8	72.2	14	27.7	66.9	0.7	0.7	2.1	2
6037602106	39.25	74.83	70-75%	5702 Los Angeles	13.7	78.4	7.9	55	11.2	20.2	0.3	10.6	2.8
6037700102	39.25	74.81	70-75%	4061 Los Angeles	3.4	76.9	19.7	12.8	76.1	3	0.2	5.2	2.7
6037207502	39.24	74.80	70-75%	2589 Los Angeles	2.1	49.4	48.5	12.4	19.9	4.9	0.1	60.1	2.6
6073014400	39.22	74.79	70-75%	3523 San Diego	15.5	73.8	10.7	41.9	23.5	26.5	0.4	4.2	3.5
6037600602	39.21	74.78	70-75%	2551 Los Angeles	19.8	75.8	4.4	62.9	0.6	33.7	0.2	0.5	2
6059087505	39.21	74.76	70-75%	5222 Orange	17.9	76.2	5.9	64.3	17.8	3	0.2	12.2	2.4
6107003002	39.20	74.75	70-75%	3519 Tulare	22	73	5	72.3	19.2	5.2	0.3	1.7	1.4
6037502402	39.19	74.74	70-75%	3755 Los Angeles	12.4	75.5	12.1	93.9	4.6	0.5	0.3	0.4	0.3
6039000507	39.18	74.73	70-75%	10546 Madera	18	73.8	8.2	69.1	24.4	3.3	0.5	1.5	1.2
6037408004	39.18	74.71	70-75%	2246 Los Angeles	12.7	77.8	9.5	46.1	11.8	5.1	0.2	35	1.8
6037190202	39.17	74.70	70-75%	3044 Los Angeles	2.9	85.3	11.8	23.4	54.9	7.8	0.6	9.8	3.6
6037301206	39.17	74.69	70-75%	5363 Los Angeles	8.7	76.3	15	8.1	68.2	0.8	0.1	17.9	4.9
6065048200	39.16	74.68	70-75%	4301 Riverside	15.5	76.9	7.6	38.6	34.8	8.3	0.4	14.8	3.2
6037603801	39.16	74.66	70-75%	4483 Los Angeles	15.7	78.6	5.7	54.7	9.7	19.5	0.2	13.8	2.2
6067006800	39.15	74.65	70-75%	7455 Sacramento	20.4	73.4	6.2	53.3	18.3	11	0.5	14	2.9
6037188202	39.13	74.64	70-75%	2347 Los Angeles	8	74.9	17.1	12.5	66.4	3.2	0	14.8	3.1
6037910101	39.11	74.62	70-75%	1684 Los Angeles	19.2	76.3	4.5	74.3	10.5	10.2	0.2	3.3	1.5
6037500900	39.09	74.61	70-75%	5719 Los Angeles	13.1	73.3	13.6	91.1	4.9	0.6	0.2	2.7	0.5
6067001800	39.08	74.60	70-75%	4686 Sacramento	12.1	79.4	8.5	24.9	44.4	17.2	0.7	7.6	5.2
6031000900	39.07	74.59	70-75%	8057 Kings	18.9	69.1	12	56.3	35.2	3.9	0.9	1.7	2
6037407501	39.07	74.57	70-75%	4411 Los Angeles	16.7	75.2	8.1	81.5	5.1	2.2	0.2	9.8	1.1
6059087902	39.06	74.56	70-75%	6039 Orange	16.1	75.5	8.4	63	12.4	0.5	0.1	22.6	1.3
6085501502	39.06	74.55	70-75%	4549 Santa Clara	18.6	75.7	5.7	70	11.4	1.4	0.2	15.1	1.8
6019005304	39.05	74.54	70-75%	5305 Fresno	13.8	79.3	6.9	44.4	32.4	7.6	0.6	12.2	2.8
6039000508	39.04	74.52	70-75%	6878 Madera	15.5	75.2	9.3	59.3	35.4	2	0.8	1.5	1
6075023001	39.04	74.51	70-75%	5216 San Francisco	9.5	76	14.5	15	5.4	14	0.1	63.8	1.6
6013306002	39.04	74.50	70-75%	2985 Contra Costa	12.1	73.9	14	33	49.8	9.1	0.3	3.8	4
6025011202	39.03	74.49	70-75%	5444 Imperial	18.3	71	10.7	86.7	9.6	1.7	0.2	1.3	0.5
6101050202	39.01	74.47	70-75%	4037 Sutter	19.5	73.7	6.8	52.1	39.3	2.3	1.5	2.1	2.8
6067007501	39.01	74.46	70-75%	6067 Sacramento	14.7	73.9	11.4	18.5	64.2	8	0.8	4.4	4.1
6037602301	39.00	74.45	70-75%	6265 Los Angeles	12.7	76.4	10.9	54.8	29.4	3.6	0.2	8.7	3.3
6065041202	39.00	74.44	70-75%	4458 Riverside	18.1	74.8	7.1	81.9	14.1	1.1	0.2	2	0.7
6037554521	39.00	74.42	70-75%	5752 Los Angeles	8.5	70.8	20.7	16.9	25	9.4	0.1	45.6	2.9
6037104620	39.00	74.41	70-75%	3539 Los Angeles	16.5	74.8	8.7	96.6	2	0.3	0.5	0.3	0.2
6037408303	38.99	74.40	70-75%	4029 Los Angeles	12.7	73.5	13.8	77.2	11.6	1.1	0.1	9	0.9
6071003507	38.98	74.39	70-75%	4887 San Bernardino	15.9	76.7	7.4	69.4	11.2	14.5	0.4	2.6	2
6037270200	38.98	74.37	70-75%	3761 Los Angeles	11.8	79.2	9	58.7	20.2	9.8	0.1	8.2	3
6099000503	38.96	74.36	70-75%	4930 Stanislaus	15.2	77.8	7	34.9	46.6	4.9	0.4	8	5.1
6031000100	38.95	74.35	70-75%	3457 Kings	15.1	72.2	12.7	38.2	57.8	0.5	0.4	1.5	1.6
6037212204	38.95	74.33	70-75%	3344 Los Angeles	14	77.2	8.8	75.3	4.5	4	0	15.5	0.7
6037573401	38.94	74.32	70-75%	1439 Los Angeles	14.9	76.3	8.8	38.2	27.4	10.8	0.4	19.2	4
6099000402	38.92	74.31	70-75%	10095 Stanislaus	17	73.2	9.8	34	54.1	2	0.4	6.3	3.2
6047000603	38.91	74.30	70-75%	6143 Merced	19.3	71.2	9.5	56.5	33.8	4.3	0.6	3	1.8
6037188300	38.91	74.28	70-75%	3536 Los Angeles	9	73.5	17.5	31.5	36.3	0.8	0.1	28.6	2.8
6037192420	38.91	74.27	70-75%	3637 Los Angeles	9.7	81.2	9.1	45.1	11.1	2.5	0.2	39.2	1.9
6107002400	38.89	74.26	70-75%	11470 Tulare	18.7	74.2	7.1	44.1	46.9	1.9	0.7	4.2	2.3
6037124300	38.88	74.25	70-75%	4046 Los Angeles	13.1	78.6	8.3	69.6	22	2.5	0.2	4.4	1.3
6053000502	38.85	74.23	70-75%	4161 Monterey	18.8	72.3	8.9	86.6	8.8	0.2	0.2	3.3	0.9
6067009005	38.83	74.22	70-75%	3165 Sacramento	13.2	76.5	10.3	20.3	53.6	10	0.7	9.3	6
6071000504	38.83	74.21	70-75%	5450 San Bernardino	11.9	80.2	7.9	55.2	32.4	3.3	0.2	7.6	1.3
6065041404	38.82	74.20	70-75%	3725 Riverside	14.8	78.2	7	58.2	27.5	3.5	0.8	7.7	2.2
6071007800	38.82	74.18	70-75%	4912 San Bernardino	14.7	80.6	4.7	28.5	44.2	7.6	0.4	15.9	3.5
6059087200	38.82	74.17	70-75%	7643 Orange	13.7	74.7	11.6	61	27.3	2.5	0.2	7.4	1.5
6013314102	38.81	74.16	70-75%	5923 Contra Costa	16	76.9	7.1	54.3	18.3	11.4	0.2	12.1	3.6
6037139302	38.81	74.15	70-75%	4422 Los Angeles	10.4	79.1	10.5	27.1	49.4	9.2	0.3	9.5	4.5
6077003311	38.80	74.13	70-75%	3303 San Joaquin	17.5	72.9	9.6	37.5	25.7	15.1	0.6	16.5	4.7
6037113321	38.77	74.12	70-75%	5473 Los Angeles	11.2	81	7.8	33	38.2	5.5	0.3	20	3.1
6037131800	38.76	74.11	70-75%	5341 Los Angeles	14.1	76.7	9.2	56.7	23.7	2.6	0.3	14.6	2.1
6085504319	38.76	74.10	70-75%	6936 Santa Clara	14.4	75.9	9.7	18.4	10.2	2.2	0.3	66.5	2.5
6013315000	38.74	74.08	70-75%	3281 Contra Costa	12.7	80.9	6.4	23	44.2	7.5	0.6	19.7	5
6099000910	38.71	74.07	70-75%	6585 Stanislaus	15.3	72.6	12.1	32.2	51.9	5.6	0.6	4.9	4.8
6037554511	38.70	74.06	70-75%	4029 Los Angeles	9.5	76	14.5	9.9	12.5	4.9	0	70.1	2.6
6077005113	38.70	74.04	70-75%	6156 San Joaquin	13.9	69.9	16.2	32.5	48.6	5.2	0.6	8.8	4.3
6071004404	38.69	74.03	70-75%	5570 San Bernardino	20.7	72.8	6.5	76.8	11.3	7.4	0.4	2.8	1.3
6085503112	38.66	74.02	70-75%	4025 Santa Clara	14.4	78.7	6.9	59.8	14.5	2.9	0.2	20.5	2.1
6095253500	38.66	74.01	70-75%	8423 Solano	8.7	61.7	29.6	17.2	70	4.8	0.5	4.8	2.6
6071000304	38.66	73.99	70-75%	5871 San Bernardino	15.7	76.8	7.5	62.8	15.1	4.2	0.4	15.4	2.1
6073015902	38.65	73.98	70-75%	5220 San Diego	17	75.9	7.1	35.2	50.4	6.9	0.4	2.9	4.2
6037404903	38.64	73.97	70-75%	2905 Los Angeles	15.5	76.4	8.1	74.7	5.5	1.3	0.1	18.1	0.3
6037482303	38.63	73.96	70-75%	5818 Los Angeles	12.3	77.7	10	35.3	2.6	0.1	0.1	61.5	0.4
6037406701	38.62	73.94	70-75%	3246 Los Angeles	12.4	75.3	12.3	60.5	13.3	6	0.2	18	1.9
6025012400	38.61	73.93	70-75%	1266 Imperial	3.5	48.9	47.6	18.3	73	3.7	1.5	0.5	3
6029003205	38.60	73.92	70-75%	8998 Kern	18.2	76.6	5.2	56	22.6	7.3	0.2	11.8	2.1
6037119342	38.58	73.91	70-75%	3180 Los Angeles	17.1	78.6	4.3	80.2	4.7	3.5	0.3	10	1.2
6037203710	38.57	73.89	70-75%	3259 Los Angeles	16.2	75.9	7.9	97.2	0.8	0.7	0.2	0.8	0.3
6077003307	38.57	73.88	70-75%	4559 San Joaquin	16.3	69.2	14.5	38.1	29.7	11.7	0.3	15.6	4.5
6037535701	38.56	73.87	70-75%	6050 Los Angeles	16.4	76.4	7.2	97.1	2.1	0.1	0	0.4	0.3
6029001103	38.56	73.86	70-75%	4782 Kern	23.8	72.5	3.7	86.5	7.9	3	1.2	0.5	0.9
6095252402	38.53	73.84	70-75%	5238 Solano	17.1	75.7	7.2	42.2	26.5	13	0.5	12.4	5.5
6037212202	38.51	73.83	70-75%	3612 Los Angeles	15	79.4	5.6	79.4	2.3	2	0.2	15.4	0.6
6071001903	38.50	73.82	70-75%	8028 San Bernardino	14.1	82.7	3.2	34	30.3	9.9	0.7	21.8	3.3
6029006303	38.49	73.81	70-75%	6784 Kern	24	71.7	4.3	93.8	4	0.5	0.3	0.4	0.9
6037600912	38.48	73.79	70-75%	5517 Los Angeles	15.8	77.8	6.4	76.4	2.8	18.3	0.2	0.8	1.5
6037183620	38.47	73.78	70-75%	3264 Los Angeles	15.4	76.6	8	73.8	12.4	1.1	0.4	10.9	1.4
6059086301	38.47	73.77	70-75%	7474 Orange	14.6	76.1	9.3	73	17.3	1.1	0.1	7.6	0.9
6067007503	38.46	73.75	70-75%	4912 Sacramento	15.5	74.7	9.8	13.9	59.7	13.8	1.5	5.6	5.4
6037119700	38.45	73.74	70-75%	5045 Los Angeles	11.8	74.7	13.5	47.4	26.8	1.5	0.2	22.4	1.8
6037131100	38.45	73.73	70-75%	3252 Los Angeles	12.3	75.8	11.9	42.7	42.8	4	0.3	8.1	2.2
6065042621	38.44	73.72	70-75%	6556 Riverside	16.9	77.3	5.8	54.3	14.2	18.4	0.4	9.6	3
6037600501	38.44	73.70	70-75%	2478 Los Angeles	10.8	70.8	18.4	13.4	1.1	81.8	0	1	2.6
6059075004	38.43	73.69	70-75%	5245 Orange	25.6	72.7	1.7	94.4	3.9	0.6	0	0.7	0.3
6019004801	38.41	73.68	70-75%	4604 Fresno	20.6	72.6	6.8	58.1	27.1	8.7	0.9	2.8	2.4
6077003216	38.40	73.67	70-75%	2725 San Joaquin	14	73.5	12.5	31.6	35.5	11.9	0.5	16.4	4

6037600201	38.40	73.65	70-75%	4600 Los Angeles	18.4	75.4	6.2	60.3	0.6	37.6	0	0.4	1.1
6059001303	38.38	73.64	70-75%	5752 Orange	14.5	77.4	8.1	63.3	23.8	1.2	0.2	9.4	2
6073013103	38.32	73.63	70-75%	2668 San Diego	14.7	75.7	9.6	79.8	12.2	2.3	0.4	4.5	0.9
6065043813	38.31	73.62	70-75%	4340 Riverside	16.6	73	10.4	36.1	41	3.7	12.4	2.6	4.2
6085501000	38.30	73.60	70-75%	4769 Santa Clara	10.9	77.1	12	52.5	22.7	3.4	0.4	18.3	2.7
6083002502	38.30	73.59	70-75%	7345 Santa Barbara	18.8	73	8.2	85.1	9.9	0.7	0.3	2.6	1.5
6037117201	38.29	73.58	70-75%	4352 Los Angeles	15.8	73.9	10.3	66.1	13.3	5.1	0.1	12.9	2.5
6037221402	38.28	73.57	70-75%	2715 Los Angeles	12.5	71.7	15.8	49	8.4	28.4	0.2	11.8	2.3
6065043317	38.25	73.55	70-75%	8526 Riverside	17.7	71.4	10.9	38.4	44	7.4	0.4	6	3.8
6037481606	38.25	73.54	70-75%	4871 Los Angeles	9.9	76.7	13.4	19.7	4.8	0.8	0.1	73.4	1.1
6037408006	38.25	73.53	70-75%	3863 Los Angeles	13.4	79.4	7.2	43.3	5.3	5.9	0.2	43	2.4
6001438100	38.23	73.51	70-75%	7675 Alameda	15.1	76.5	8.4	44.2	19.6	7.9	0.4	24.2	3.7
6065042903	38.21	73.50	70-75%	5738 Riverside	17.4	73.8	8.8	72.4	18.3	7.2	0.4	0.8	0.9
6085503208	38.20	73.49	70-75%	3985 Santa Clara	16.9	75.9	7.2	65	7.6	2.9	0.4	22.7	1.4
6037132300	38.19	73.48	70-75%	6494 Los Angeles	12.9	76.3	10.8	54.8	25.7	2.9	0.3	11.8	4.4
6065040605	38.18	73.46	70-75%	3543 Riverside	18.7	75.7	5.6	82.5	15.7	0.2	0.1	0.8	0.7
6001402800	38.17	73.45	70-75%	3345 Alameda	7.5	75.8	16.7	8.3	23.7	41.2	0.6	21.5	4.8
6077001102	38.17	73.44	70-75%	4889 San Joaquin	15.4	72.5	12.1	43	40.4	6.9	0.5	5.1	4.1
6037535502	38.17	73.43	70-75%	4958 Los Angeles	17.2	75.3	7.5	96.5	2.4	0.3	0.1	0.3	0.4
6047001200	38.16	73.41	70-75%	5023 Merced	14	68.7	17.3	32.8	51.8	3.9	0.8	7.4	3.3
6037920023	38.14	73.40	70-75%	2598 Los Angeles	12.2	78.2	9.6	48.8	45.1	1.8	0.2	1.7	2.4
6037104500	38.13	73.39	70-75%	3293 Los Angeles	18.4	73.1	8.5	95.3	3.2	0.6	0	0.8	0.1
6037481001	38.13	73.38	70-75%	3842 Los Angeles	8	71.2	20.8	30.5	13.4	0.9	0.2	53.8	1.2
6047001402	38.12	73.36	70-75%	4277 Merced	14.9	72.8	12.3	44.5	43.9	3.4	0.9	5.7	1.7
6037106112	38.12	73.35	70-75%	5969 Los Angeles	14	76.9	9.1	68.6	16.9	3.6	0.3	9.1	1.6
6037604001	38.10	73.34	70-75%	4470 Los Angeles	15.1	78.6	6.3	64.7	17.6	8.6	0.2	7	1.9
6073020500	38.10	73.33	70-75%	5196 San Diego	17.8	71.2	11	69.2	25	0.9	0.2	3.3	1.4
6077005501	38.10	73.31	70-75%	5268 San Joaquin	2.9	91.3	5.8	28.2	47.2	18.7	1.1	1.3	3.7
6037115104	38.09	73.30	70-75%	4444 Los Angeles	7.8	83	9.2	22.6	43.1	8.1	0.2	21.8	4.2
6107000701	38.08	73.29	70-75%	2635 Tulare	17.2	73.6	9.2	72.2	24.4	0.5	0.5	0.6	1.7
6037217100	38.08	73.28	70-75%	5374 Los Angeles	11.2	78.1	10.7	37.9	20	33.2	0.4	4.6	4
6037407502	38.08	73.26	70-75%	3937 Los Angeles	15.1	76.2	8.7	80.4	7.1	0.9	0.1	10.9	0.6
6059074802	38.07	73.25	70-75%	5845 Orange	19.7	75.2	5.1	90.6	2.9	1.2	0.3	4.6	0.4
6037104201	38.07	73.24	70-75%	4780 Los Angeles	17.8	76.5	5.7	89.8	1	8.1	0.1	0.1	0.8
6067007424	38.07	73.22	70-75%	3508 Sacramento	16.6	76.4	7	21.5	49.4	16	0.8	5.8	6.6
6107002601	38.06	73.21	70-75%	4218 Tulare	21.4	69.7	8.9	87.6	11	0.2	0.4	0.5	0.3
6085512604	38.05	73.20	70-75%	4505 Santa Clara	18.9	71.6	9.5	83.3	12.1	1.2	0.6	1.6	1.2
6037236400	38.03	73.19	70-75%	4113 Los Angeles	9.2	70.8	20	6.1	2.9	85	0.1	1.5	4.4
6055200301	38.02	73.17	70-75%	5095 Napa	16.2	75.8	8	48.7	46.7	0.5	0.2	2.1	1.8
6037190301	38.02	73.16	70-75%	4758 Los Angeles	4.7	82.9	12.4	24.4	60.1	4.9	0.1	6.9	3.5
6059074601	38.02	73.15	70-75%	8286 Orange	18.3	76.9	4.8	92.1	6.1	0.2	0.1	1.2	0.3
6037310702	38.02	73.14	70-75%	7104 Los Angeles	7.1	72.4	20.5	14.5	65.3	3.5	0.2	12.6	4
6037501200	38.01	73.12	70-75%	5057 Los Angeles	14.5	74.9	10.6	81.4	14.6	0.4	0.2	2.2	1.2
6059088902	38.00	73.11	70-75%	5143 Orange	12.1	76.9	11	28.3	10.1	0.6	0.1	59.5	1.5
6065042210	37.96	73.10	70-75%	4761 Riverside	10.4	87.5	2.1	39	23	14.3	0.3	19.7	3.7
6037550601	37.95	73.09	70-75%	5639 Los Angeles	15.2	74.3	10.5	71.6	15.5	3.1	0.2	8.7	0.9
6073012401	37.94	73.07	70-75%	3676 San Diego	14.9	75.3	9.8	67.1	18	6	0.4	6.3	2.2
6065031402	37.93	73.06	70-75%	6518 Riverside	14.1	73.3	12.6	47.6	40.2	6	0.7	2.9	2.6
6067004300	37.93	73.05	70-75%	9553 Sacramento	18	74.8	7.2	26.9	9.6	22.4	0.5	35.2	5.4
6013369001	37.91	73.04	70-75%	6246 Contra Costa	13.1	69.5	17.4	40.7	15.3	23.5	0.3	16.4	3.8
6059075403	37.91	73.02	70-75%	7081 Orange	13	77.3	9.7	64.7	25.2	2.2	0.2	6.4	1.3
6037552800	37.91	73.01	70-75%	6401 Los Angeles	16	77.2	6.8	72.1	12.5	3.3	0.1	11	1
6037131300	37.90	73.00	70-75%	4902 Los Angeles	12.2	77.8	10	62.4	20.9	2	0.2	12.6	1.9
6037183820	37.88	72.99	70-75%	3464 Los Angeles	17.5	77.4	5.1	88.1	5.1	1.6	0.1	4.3	0.7
6037211410	37.87	72.97	70-75%	3095 Los Angeles	11.2	79	9.8	36	6.6	3.4	0	53.1	0.9
6077005405	37.83	72.96	70-75%	3417 San Joaquin	17.3	75.2	7.5	51.5	27.2	8.2	0.3	8.2	4.7
6037134104	37.83	72.95	70-75%	4322 Los Angeles	13.2	79.4	7.4	42.9	19.8	6	0	28.4	2.9
6037430102	37.83	72.93	70-75%	4809 Los Angeles	14.6	75.1	10.3	74.7	11.3	4.4	0.3	8	1.3
6065031703	37.82	72.92	70-75%	3611 Riverside	14.5	78.4	7.1	49.6	37.7	4.3	0.5	5.9	1.9
6037201602	37.82	72.91	70-75%	2840 Los Angeles	13.3	74.6	12.1	84.1	4.5	0.6	0	10.5	0.3
6029002817	37.81	72.90	70-75%	5173 Kern	19.4	74.3	6.3	41.6	35.5	15.6	1	2.9	3.4
6037212303	37.81	72.88	70-75%	3326 Los Angeles	14.8	81.7	3.5	69.5	6.6	5.1	0.2	17	1.6
6069000400	37.81	72.87	70-75%	5975 San Benito	16.5	74.3	9.2	73.4	24	0.8	0.2	0.7	1
6037125200	37.80	72.86	70-75%	3524 Los Angeles	9.6	82.3	8.1	30	54.5	5.1	0.7	6.2	3.5
6065040815	37.79	72.85	70-75%	3586 Riverside	13	80.8	6.2	34	27.9	11.2	0.2	23.6	3.1
6037482304	37.78	72.83	70-75%	3556 Los Angeles	13.7	75.5	10.8	45.8	2.2	0.1	0	51.5	0.4
6107002500	37.77	72.82	70-75%	3778 Tulare	17.6	71.7	10.7	63.8	32.5	0.3	0.3	1.7	1.4
6059086903	37.76	72.81	70-75%	6861 Orange	16.9	75.2	7.9	53.4	22.8	4	0.1	17.4	2.3
6037600202	37.74	72.80	70-75%	6205 Los Angeles	17.2	75.3	7.5	51.5	1	45.5	0.2	0.4	1.3
6073015802	37.74	72.78	70-75%	4673 San Diego	13.4	72	14.6	32	51.8	6.6	0.7	3.6	5.3
6037135114	37.74	72.77	70-75%	4445 Los Angeles	9.5	73.8	16.7	12.7	51.2	5.1	0.3	26.7	4.1
6059099702	37.74	72.76	70-75%	8182 Orange	12	74.2	13.8	21.3	25.6	1	0.3	49.7	2.2
6073012700	37.72	72.75	70-75%	4955 San Diego	13.9	75.1	11	71.1	16.4	5	0.3	5.2	2
6059088602	37.72	72.73	70-75%	4433 Orange	12.7	76.6	10.7	36.7	23.1	1.3	0.2	37.2	1.6
6037480304	37.71	72.72	70-75%	4098 Los Angeles	8.5	76.7	14.8	27.6	7.5	2.7	0.2	59.6	2.4
6055200503	37.66	72.71	70-75%	1769 Napa	13.8	80.2	6	47.3	48.9	0.2	0.4	1	2.3
6101050201	37.64	72.70	70-75%	3249 Sutter	18.2	71.6	10.2	43.4	41.6	1.7	1.3	8.5	3.5
6013366001	37.63	72.68	70-75%	4307 Contra Costa	14.9	76.3	8.8	56	9.4	13.4	0.2	18.4	2.5
6025011802	37.63	72.67	70-75%	4870 Imperial	13.6	72.3	14.1	73.1	20.7	2.4	0.5	2.6	0.8
6037218701	37.63	72.66	70-75%	2430 Los Angeles	13.9	75.8	10.3	42.3	5	41.7	0.4	7.3	3.3
6071011700	37.62	72.64	70-75%	1768 San Bernardino	14.4	72.5	13.1	48.5	45.1	1.5	1	1.6	2.4
6037117407	37.61	72.63	70-75%	3636 Los Angeles	22.3	75.9	1.8	92.9	1.7	2.3	0	2.5	0.6
6001407500	37.59	72.62	70-75%	3931 Alameda	18.9	73.4	7.7	49.5	3.4	37.3	0.2	7.6	2.1
6037320202	37.58	72.61	70-75%	5797 Los Angeles	14.8	76.5	8.7	89.5	7.5	0.5	0.4	1.4	0.7
6071002703	37.56	72.59	70-75%	5780 San Bernardino	14.9	79.4	5.7	49.2	26.1	18.4	0.1	4	2.2
6037186302	37.56	72.58	70-75%	5198 Los Angeles	11.9	77.3	10.8	55.1	21.1	1.9	0.2	19.4	2.3
6047000202	37.54	72.57	70-75%	1841 Merced	18.4	72.6	9	63.7	31.7	0.2	0.4	3	1.1
6107002003	37.53	72.56	70-75%	5663 Tulare	14.1	72.7	13.2	38.8	53	2.2	0.9	2.5	2.6
6107002904	37.52	72.54	70-75%	5002 Tulare	18.8	73.3	7.9	54.1	38.6	3.9	0.5	0.8	2.1
6085503121	37.51	72.53	70-75%	4499 Santa Clara	15	76.6	8.4	56.4	19.2	6.9	0.5	15	1.9
6019008100	37.50	72.52	70-75%	5691 Fresno	18.4	74.8	6.8	60.3	33.4	1.7	0.4	3.1	1.1
6067006102	37.48	72.51	70-75%	3114 Sacramento	9.7	71.5	18.8	16.1	63.9	9.3	0.5	5.4	4.7
6071001703	37.47	72.49	70-75%	5979 San Bernardino	13.2	78	8.8	49.2	34.3	4.3	0.4	9.9	2
6037301204	37.45	72.48	70-75%	4990 Los Angeles	9.4	75.4	15.2	11.4	62.7	3	0	18.8	4.1
6085503710	37.44	72.47	70-75%	3599 Santa Clara	19.2	69	11.8	70.8	3.4	2.3	0.1	22	1.3
6037402703	37.43	72.46	70-75%	4686 Los Angeles	14.6	78	7.4	68.5	12.3	8.2	0.4	8.6	2.1
6037603101	37.43	72.44	70-75%	4244 Los Angeles	12.2	74.7	13.1	40.2	10.1	16	0.1	30.8	2.8
6019001414	37.43	72.43	70-75%	7381 Fresno	17.4	72.8	9.8	35.6	27.3	6.5	0.3	27.4	2.9
6019005602	37.42	72.42	70-75%	5467 Fresno	14.3	68.6	17.1	30.8	55	1.5	0.9	8.7	3.2
6029006100	37.41	72.41	70-75%	8264 Kern	16.5	69.2	14.3	31.7	61.6	1.5	0.8	2.1	2.3
6065042212	37.40	72.39	70-75%	6727 Riverside	14.3	79.9	5.8	45.9	26.9	16.3	0.3	7.3	3.2
6073014806	37.40	72.38	70-75%	2577 San Diego	11.6	79.3	9.1	26.2	48.4	14	0.6	6.5	4.3
6019005704	37.39	72.37	70-75%	5542 Fresno	16.1	75.9	8	37.2	50.5	1.2	0.8	7.3	2.9
6037481402	37.39	72.35	70-75%	7175 Los Angeles	8.3	76.5	15.2	18	6.1	0.4	0.1	74.5	1
6067008801	37.38	72.34	70-75%	4436 Sacramento	19.2	76.5	4.3	15.9	47.7	10.2	0.6	19.3	6.3
6065042009	37.37	72.33	70-75%	7119 Riverside	15.9	75.5	8.6	57	28.1	8.3	0.3	4.5	1.7
6013327000	37.36	72.32	70-75%	6695 Contra Costa	11.4	74.4	14.2	31.9	52.4	4.1	0.4	7.4	3.9
6077005108	37.33	72.30	70-75%	4463 San Joaquin	17.4	75.5	7.1	49.5	39.5	3.4	0.6	4.4	2.7
6037600802	37.32	72.29	70-75%	2597 Los Angeles	9.8	73.5	16.7	11.2	3.5	81.2	0.5	0.5	3.2
6071009904	37.31	72.28	70-75%	10960 San Bernardino	20	71.8	8.2	47.3	23.7	21.9	0.4	3.2	3.4
6065042617	37.30	72.27	70-75%	11436 Riverside	19.5	75.8	4.7	76	8.1	11.2	0.2	2.7	1.7
6065040821	37.28	72.25	70-75%	5691 Riverside	15.4	79.6	5	36.1	31.5	12.2	0.2	16	4.1
6037124102	37.26	72.24	70-75%	3549 Los Angeles	12.4	80.9	6.7	53.2	31.6	5.6	0.1	6.3	3.1
6071002604	37.26	72.23	70-75%	5723 San Bernardino	17	79.3	3.7	74.7	12.3	7.8	0.2	3.6	1.4
6037572202	37.26	72.22	70-75%	3609 Los Angeles	12.1	74.6	13.3	34.3	17.3	15.4	0.2	30	2.8
6001428000	37.26	72.20	70-75%	2928 Alameda	10.6	81.5	7.9	17.9	35.1	7.5	0.3	32.9	6.3
6107003502	37.25	72.19	70-75%	10796 Tulare	18.2	73.7	8.1	54.1	35	0.8	0.7	7.5	2
6067004903	37.25	72.18	70-75%	6740 Sacramento	19.3	73.5	7.2	22.7	8.9	24.6	0.4	38	5.5
6007003001	37.23	72.17	70-75%	3140 Butte	16.2	72.7	11.1	15.7	46.8	11.2	3.7	17	5.6
6077003410	37.23	72.15	70-75%	5778 San Joaquin	17.2	75.2	7.6	34.3	11.4	14	0.3	36.1	3.9
6037120107	37.22	72.14	70-75%	3818 Los Angeles	22.9	72.5	4.6	85.8	5.3	2	0.1	5.3	1.4
6037576502	37.21	72.13	70-75%	4543 Los Angeles	12.4	83.3	4.3	45.7	26	17.5	0.5	6.4	3.9
6067003101	37.21	72.12	70-75%	3568 Sacramento	15.9	74.1	10	53.3	29.5	7.2	0.8	5.5	3.8

6067005601	37.20	72.10	70-75%	4822 Sacramento	10.5	67.3	22.2	17	62	8.8	1	6.7	4.5
6037132001	37.19	72.09	70-75%	3202 Los Angeles	13.3	74.5	12.2	33.3	52	3.4	0.2	7.7	3.3
6019004901	37.19	72.08	70-75%	4052 Fresno	17.8	73.7	8.5	51.7	34.1	5.6	1	5.8	1.7
6037482502	37.18	72.06	70-75%	3373 Los Angeles	12.4	76.1	11.5	29.3	2.2	0.4	0.1	67.5	0.5
6077003112	37.16	72.05	70-75%	2974 San Joaquin	11	68.4	20.6	25	45.9	9.2	0.4	15.4	4
6077004501	37.15	72.04	70-75%	2327 San Joaquin	13.4	68	18.6	37	52.3	0.9	0.4	6.5	2.8
6071003403	37.15	72.03	70-75%	4524 San Bernardino	15.7	76.9	7.4	78.2	16.6	2	0.2	2	1
6037216700	37.14	72.01	70-75%	3709 Los Angeles	9.3	75.3	15.4	20.1	31.6	34.2	0.3	8.5	5.2
6075012501	37.14	72.00	70-75%	5335 San Francisco	7	80.3	12.7	19.2	34.1	16.6	0.8	24.9	4.4
6099003605	37.12	71.99	70-75%	8007 Stanislaus	11.3	77.1	11.6	25.6	59.2	2	0.4	8.7	4.1
6037125501	37.11	71.98	70-75%	3077 Los Angeles	7.5	84.8	7.7	29.2	53.7	7.2	0.2	7.1	2.6
6059087300	37.11	71.96	70-75%	10413 Orange	18	76.6	5.4	71.7	13.7	2.1	0.1	11	1.4
6099003001	37.10	71.95	70-75%	9397 Stanislaus	17.4	75.2	7.4	48.4	31.1	2.1	0.6	14.4	3.5
6039000300	37.10	71.94	70-75%	8213 Madera	17.9	70.4	11.7	44.4	49.6	1.3	1	1.2	2.6
6059086304	37.10	71.93	70-75%	4847 Orange	13.6	77	9.4	54.2	32	1.4	0.3	10	2
6025011000	37.09	71.91	70-75%	12047 Imperial	17.3	75.5	7.2	72.3	23.1	1.9	0.2	1.5	0.9
6019003103	37.08	71.90	70-75%	5708 Fresno	15.9	75.6	8.5	36.7	44.4	4.3	0.7	10.8	3
6071011800	37.08	71.89	70-75%	7000 San Bernardino	16.3	72.8	10.9	41.9	46.4	4.8	1.5	2.6	2.8
6059074109	37.08	71.88	70-75%	3801 Orange	18.2	77	4.8	89.4	3.5	0.6	0.2	6.1	0.1
6071001905	37.08	71.86	70-75%	6389 San Bernardino	15.5	79.3	5.2	46.4	30.6	5.3	0.3	14.9	2.6
6071000604	37.07	71.85	70-75%	5682 San Bernardino	13.5	76.3	10.2	65.1	26.6	2.9	0.3	3.8	1.3
6037482301	37.07	71.84	70-75%	5162 Los Angeles	11	78.2	10.8	26.3	2.3	0.4	0.1	70.1	0.7
6019003600	37.06	71.82	70-75%	4009 Fresno	12.8	75.8	11.4	37.1	54.4	2.2	0.7	3.1	2.4
6037267300	37.06	71.81	70-75%	3680 Los Angeles	5.3	84.9	9.8	19.9	42.4	4.4	0.2	28.3	4.9
6107004400	37.04	71.80	70-75%	7470 Tulare	22.4	71.2	6.4	91.1	1.9	0.5	0.1	5.9	0.5
6013306004	37.02	71.79	70-75%	3324 Contra Costa	14.4	72.5	13.1	30.4	46.4	14.4	0.6	4.1	4.2
6025010900	37.00	71.77	70-75%	6755 Imperial	15.6	72	12.4	80.9	17.4	0.3	0.1	0.6	0.6
6071008705	36.99	71.76	70-75%	4617 San Bernardino	14.3	74.2	11.5	35.8	58.9	1.2	0.6	1.2	2.4
6037183610	36.99	71.75	70-75%	3275 Los Angeles	15.1	78	6.9	80.6	8.2	2	0.2	7.3	1.6
6085502002	36.96	71.74	70-75%	4887 Santa Clara	19.3	75.8	4.9	69.8	18.6	2.8	0.3	6	2.5
6037577000	36.96	71.72	70-75%	6995 Los Angeles	8.6	84.8	6.6	27.1	44.6	13	0.3	10.4	4.7
6037115401	36.95	71.71	70-75%	5776 Los Angeles	13.5	76.6	9.9	46.2	33.4	5.2	0.1	12.2	2.9
6067005509	36.94	71.70	70-75%	1910 Sacramento	13.2	83.2	3.6	28.8	32.8	19.3	0.7	12.1	6.3
6037576501	36.94	71.69	70-75%	3369 Los Angeles	13.4	78.4	8.2	46.4	27.5	17.1	0.3	5.5	3.2
6037293201	36.92	71.67	70-75%	6629 Los Angeles	14	77.6	8.4	53.2	15.9	4.6	0.2	24	2.1
6037234502	36.92	71.66	70-75%	2698 Los Angeles	11.1	72.5	16.4	33.7	1.6	60.8	0.1	1	2.8
6071000401	36.91	71.65	70-75%	6387 San Bernardino	12.2	78.7	9.1	54.2	34.2	2.5	0.2	7.1	1.7
6037106114	36.91	71.64	70-75%	5880 Los Angeles	17	76.7	6.3	84.9	7.5	3.6	0.4	2.3	1.3
6037201504	36.89	71.62	70-75%	2428 Los Angeles	14.8	76.6	8.6	88	3.3	0.8	0.5	7.1	0.3
6037543304	36.88	71.61	70-75%	6061 Los Angeles	9.3	71.8	18.9	6.4	1.6	87.1	0.1	2.5	2.4
6065043310	36.88	71.60	70-75%	3120 Riverside	17.7	72.6	9.7	40.5	49.3	6.8	0.4	1	2
6037123602	36.87	71.59	70-75%	3332 Los Angeles	11.3	75.9	12.8	38	49.9	3	0.2	6.3	2.6
6071004507	36.86	71.57	70-75%	5042 San Bernardino	18.2	76.7	5.1	54	26.6	12.6	0.3	3.3	3.2
6067004905	36.86	71.56	70-75%	6649 Sacramento	18.4	69.8	11.8	49.3	15	18	0.3	13.4	3.9
6071005100	36.85	71.55	70-75%	7749 San Bernardino	15.5	73.2	11.3	46.5	37.6	11	0.4	1.7	2.9
6071002706	36.84	71.53	70-75%	6654 San Bernardino	11.8	79.8	8.4	47.4	25.8	20.7	0.3	3.3	2.4
6103001100	36.83	71.52	70-75%	7523 Tehama	17.8	70.9	11.3	42.3	52.3	0.4	1.6	1.2	2.3
6099000908	36.83	71.51	70-75%	5093 Stanislaus	13.3	75.9	10.8	27.9	58.8	3.5	0.8	5.4	3.5
6037139504	36.83	71.50	70-75%	3476 Los Angeles	7.9	69.1	23	9.9	76.3	3.6	0.1	4.3	5.8
6065045605	36.82	71.48	70-75%	10543 Riverside	21.8	68.6	9.6	83.2	14.3	0.4	1.1	0.8	0.2
6037209510	36.82	71.47	70-75%	2692 Los Angeles	13.9	78.8	7.3	70.7	3.2	3.6	0.2	21.2	1
6013303103	36.82	71.46	70-75%	10812 Contra Costa	17.3	74.9	7.8	41.4	43.9	5.8	0.5	4.8	3.7
6065042618	36.82	71.45	70-75%	8283 Riverside	19.5	74.5	6	79.4	8.8	7.3	0.1	3.4	1
6037211922	36.81	71.43	70-75%	3389 Los Angeles	12.6	82.9	4.5	53.2	5.3	5.6	0.2	34.2	1.4
6037553503	36.81	71.42	70-75%	2768 Los Angeles	17.9	76.4	5.7	78.7	4.5	13.6	0.1	2	1.2
6073018509	36.80	71.41	70-75%	4968 San Diego	16.9	76.3	6.8	57.3	29.4	5.3	0.5	4.3	3.1
6067004904	36.79	71.40	70-75%	5675 Sacramento	15.2	71.6	13.2	33.5	28.4	16.8	0.4	15.8	5
6081600100	36.77	71.38	70-75%	4854 San Mateo	12.2	78.3	9.5	18	46.7	1.7	0.2	28.4	4.9
6067004402	36.76	71.37	70-75%	4252 Sacramento	18.1	74.1	7.8	45.8	13.5	16.2	0.5	19.9	4.1
6037400602	36.75	71.36	70-75%	4719 Los Angeles	16.2	75.8	8	74.3	18.1	1.6	0.3	4.6	1.2
6037503106	36.72	71.35	70-75%	3795 Los Angeles	15.4	75	9.6	73.1	20.7	0.9	0.3	4.1	0.9
6071000404	36.71	71.33	70-75%	4419 San Bernardino	12.4	72.2	15.4	52.5	31.9	5.5	0.3	7.6	2.1
6071003801	36.70	71.32	70-75%	4735 San Bernardino	15.6	76	8.4	61.8	11.7	22.3	0.1	2.3	1.8
6037402001	36.70	71.31	70-75%	3080 Los Angeles	13.6	75.4	11	39.3	33.9	10.6	0.3	13.5	2.5
6037131400	36.70	71.30	70-75%	5897 Los Angeles	12.9	77.2	9.9	46.9	28.4	6	0.2	15.9	2.6
6001401300	36.69	71.28	70-75%	3528 Alameda	6.6	73	20.4	13.8	26.4	35.6	0.3	19.4	4.5
6037117530	36.69	71.27	70-75%	5641 Los Angeles	17.7	77	5.3	75	5.1	3.1	0.1	15.4	1.3
6111006100	36.68	71.26	70-75%	8378 Ventura	15.6	78.4	6	37.4	39.8	1.2	0.1	18.7	2.7
6059099701	36.67	71.24	70-75%	6171 Orange	12.8	74	13.2	22.5	15.9	0.2	0.2	59.2	1.9
6067006500	36.67	71.23	70-75%	6637 Sacramento	18.7	74.1	7.2	27.4	19.3	25.5	0.9	21.7	5.2
6007001200	36.67	71.22	70-75%	3556 Butte	9.5	84.8	5.7	14.6	76.6	1.1	1	2.8	3.9
6073010111	36.66	71.21	70-75%	3072 San Diego	15.6	75.7	8.7	90.5	4.9	1.3	0	2.4	0.9
6081601300	36.66	71.19	70-75%	7510 San Mateo	12.3	76	11.7	40.4	10.3	2.6	0.1	44	2.5
6037208904	36.66	71.18	70-75%	3926 Los Angeles	15	74.6	10.4	86.3	4.5	2	0.5	6.4	0.4
6097153104	36.66	71.17	70-75%	4046 Sonoma	19.4	75.7	4.9	65.2	27.5	1.3	1.1	2.8	2.1
6067005402	36.65	71.16	70-75%	2641 Sacramento	6	77.9	16.1	14.5	55.9	11	0.7	12.3	5.6
6071009905	36.64	71.14	70-75%	7575 San Bernardino	19.5	73.7	6.8	53.6	23.5	15.5	0.5	3.8	3.1
6037503202	36.64	71.13	70-75%	4462 Los Angeles	13.7	74.4	11.9	76.2	16.5	0.9	0.5	5	0.9
6071010013	36.63	71.12	70-75%	8022 San Bernardino	15.1	75.9	9	46.6	44.9	3.9	0.6	1.6	2.5
6037403318	36.63	71.11	70-75%	6243 Los Angeles	11.4	80.1	8.5	34.6	25.3	11.6	0.2	25.2	3.2
6059075515	36.62	71.09	70-75%	15295 Orange	16.3	79.5	4.2	37.9	25.1	2.2	0.2	31.4	3.2
6025012002	36.62	71.08	70-75%	9678 Imperial	15.8	75.2	9	95	2.1	0.2	0.1	2.4	0.4
6059074005	36.62	71.07	70-75%	7432 Orange	15.6	75.7	8.7	74.8	8.9	0.8	0.2	14	1.2
6013355200	36.61	71.06	70-75%	7444 Contra Costa	15.7	78.5	5.8	23.5	19.3	10.9	0.2	41.2	4.9
6065030800	36.60	71.04	70-75%	6973 Riverside	13.4	75.2	11.4	41.5	47.5	5.4	0.4	3.1	2.2
6001436200	36.58	71.03	70-75%	3827 Alameda	17.8	73.2	9	54	16.7	15.5	0.4	10.1	3.2
6037406902	36.58	71.02	70-75%	3149 Los Angeles	12.5	72.6	14.9	76.6	7.2	2.6	0.2	12.5	0.9
6053001801	36.58	71.01	70-75%	3957 Monterey	16.2	76.4	7.4	60.9	20.2	2.4	0.3	12.9	3.3
6067007504	36.57	70.99	70-75%	2054 Sacramento	13.3	69.8	16.9	15.3	67.9	7.4	0.4	5	4
6001406202	36.57	70.98	70-75%	4718 Alameda	17.8	74.4	7.8	65.5	5.6	11.9	1	14.4	1.6
6059099801	36.57	70.97	70-75%	5816 Orange	13.8	74.6	11.6	34.9	20.7	1.1	0.2	41.4	1.7
6037482503	36.57	70.95	70-75%	4357 Los Angeles	12.8	76.5	10.7	33.9	1.5	0	0	63.2	1.3
6007002800	36.57	70.94	70-75%	4275 Butte	16.4	71.7	11.9	13.4	70.7	2.6	3.1	4.3	5.9
6071002601	36.56	70.93	70-75%	10799 San Bernardino	16.9	76.6	6.5	70.2	14.2	6.7	0.2	7.3	1.3
6077003310	36.56	70.92	70-75%	4191 San Joaquin	16.9	68.4	14.7	36.2	23.3	16.2	0.5	20.2	3.5
6037134002	36.56	70.90	70-75%	3372 Los Angeles	14	77.6	8.4	61	18.2	3.1	0.3	15.3	2.1
6037602402	36.55	70.89	70-75%	6769 Los Angeles	13.5	76.6	9.9	58.5	19.6	10.1	0.2	9	2.5
6107002303	36.55	70.88	70-75%	6447 Tulare	12.9	65.8	21.3	29.7	63.6	1.9	0.4	2.1	2.2
6099000501	36.54	70.87	70-75%	7165 Stanislaus	13.5	77	9.5	30	56.6	2.7	0.6	7.1	3
6037576904	36.52	70.85	70-75%	3288 Los Angeles	12	83.6	4.4	39.4	29.5	15.2	0.4	12.3	3.3
6053001700	36.52	70.84	70-75%	3780 Monterey	16.4	75.9	7.7	64.3	24.8	3	0.2	4.9	2.9
6037481002	36.52	70.83	70-75%	5447 Los Angeles	10.2	77.5	12.3	33	8.8	1.7	0.1	55	1.4
6059001903	36.50	70.82	70-75%	3418 Orange	14.9	75.8	9.3	50.9	30	1.6	0.4	15	2.1
6037128101	36.49	70.80	70-75%	3738 Los Angeles	14.2	78.2	7.6	47.5	42	3.2	0	4.9	2.4
6067006003	36.49	70.79	70-75%	4461 Sacramento	14.6	74	11.4	19.4	64.4	6.3	0.7	5	4.2
6059086803	36.48	70.78	70-75%	7478 Orange	13.3	72.7	14	33.2	30	5.5	0.2	28.1	2.9
6037127712	36.48	70.77	70-75%	2991 Los Angeles	14.2	79.3	6.5	59.7	24.6	6.1	0.2	7.7	1.7
6037104105	36.48	70.75	70-75%	5412 Los Angeles	16.9	77.4	5.7	82.6	4.1	6.4	0.1	5.7	1.1
6059001103	36.47	70.74	70-75%	4489 Orange	14.3	72.3	13.4	61.3	30.6	1.3	0.3	5	1.4
6107003802	36.45	70.73	70-75%	4123 Tulare	20.6	68.8	10.6	66.3	29	0.7	0.9	1.8	1.2
6025010800	36.44	70.72	70-75%	1368 Imperial	13.6	73.8	12.6	52.6	45.4	0.2	0.2	0.6	1
6107001902	36.43	70.70	70-75%	4016 Tulare	12.8	72.5	14.7	33	59.4	1.2	0.7	3.9	1.8
6065040603	36.43	70.69	70-75%	2376 Riverside	15.8	76.2	8	72.5	25	0.4	0.4	1	0.7
6037543603	36.42	70.68	70-75%	3690 Los Angeles	6.2	64.3	29.5	17.9	29.5	28.1	0.3	20.4	3.9
6037211703	36.41	70.66	70-75%	4750 Los Angeles	10.7	82.3	7	38.6	8	5	0.1	46.3	2
6037183220	36.41	70.65	70-75%	4114 Los Angeles	14.4	75.1	10.5	74.7	8.7	1.4	0.2	13.9	1.2
6001432600	36.40	70.64	70-75%	6842 Alameda	11.3	74.4	14.3	30.2	26.1	19.5	0.5	20.5	3.3
6077003404	36.40	70.63	70-75%	5842 San Joaquin	17.1	69	13.9	32.9	16.4	10.7	0.4	37.1	2.5
6029006007	36.40	70.61	70-75%	5474 Kern	11.7	70.9	17.4	16.1	77.3	1.2	0.9	1.7	2.7
6065046800	36.39	70.60	70-75%	6365 Riverside	15.3	79.1	5.6	58.9	16.7	15.7	0.4	5.7	2.6
6037503103	36.39	70.59	70-75%	5004 Los Angeles	14.7	78.1	7.2	85.1	9.7	1	0.2	3.5	0.6
6071003603	36.38	70.58	70-75%	4141 San Bernardino	14.7	79.8	5.5	72.9	11.5	11.6	0.3	2.6	1.2
6019006000	36.38	70.56	70-75%	8895 Fresno	17.1	70.3	12.6	69.3	25	0.7	0.5	3.2	1.3

6107003602	36.38	70.55	70-75%	7114 Tulare	19	68.6	12.4	57.2	34	0.4	0.7	6.3	1.4
6067005506	36.37	70.54	70-75%	3066 Sacramento	16.3	79.5	4.2	31.5	36.2	16.8	0.8	8.4	6.3
6037550901	36.36	70.53	70-75%	3762 Los Angeles	13.9	77.1	9	73	19	2.6	0.1	4.2	1
6111004400	36.35	70.51	70-75%	7251 Ventura	15.3	75	9.7	52.8	33	4.6	0.4	6.1	3.2
6073010005	36.34	70.50	70-75%	7366 San Diego	14.8	72.8	12.4	92.1	2.6	1	0	3.6	0.7
6037123520	36.33	70.49	70-75%	2567 Los Angeles	11.7	78.5	9.8	51.7	38.1	2.6	0.2	4.8	2.6
6059076208	36.32	70.48	70-75%	4999 Orange	10.9	74.5	14.6	29	57.6	1.7	0.4	9.1	2.2
6029000506	36.31	70.46	70-75%	2795 Kern	16.2	77.5	6.3	24.1	57.1	5.1	1	9.7	3
6071010012	36.31	70.45	70-75%	4877 San Bernardino	15.3	74	10.7	43.9	47.7	3.9	0.4	1.6	2.5
6037218220	36.31	70.44	70-75%	4358 Los Angeles	13.4	76.8	9.8	52.1	6.8	33.3	0.1	4.7	2.9
6065031100	36.29	70.43	70-75%	4584 Riverside	14.7	73.7	11.6	35.4	52.6	6.9	0.7	1.7	2.6
6065043505	36.28	70.41	70-75%	2911 Riverside	5.2	49	45.8	23.7	65.9	5.8	0.6	1.6	2.4
6065043504	36.26	70.40	70-75%	7743 Riverside	15.5	65.9	18.6	33.7	52.8	5.6	0.6	4.4	2.9
6037119202	36.24	70.39	70-75%	4707 Los Angeles	15.5	76.5	8	89	5	1.5	0.1	3.8	0.7
6019003810	36.22	70.37	70-75%	5256 Fresno	15.5	78.2	6.3	46.4	24	11.3	1	15.3	2
6037554201	36.22	70.36	70-75%	4108 Los Angeles	15	76.4	8.6	53.4	21.1	9.8	0.3	13.3	2.1
6037482800	36.21	70.35	70-75%	4074 Los Angeles	10.6	70.4	19	48.8	8.4	0.2	0	40.6	2
6037117510	36.20	70.34	70-75%	4028 Los Angeles	20.5	74.6	4.9	83.4	4.4	3.5	0	7.8	0.9
6037408402	36.20	70.32	70-75%	5799 Los Angeles	10	72.5	17.5	55.5	21.8	1.1	0.1	20.1	1.5
6037481202	36.20	70.31	70-75%	6608 Los Angeles	12.3	76.8	10.9	37	9.2	1.1	0.3	50.9	1.5
6065042206	36.18	70.30	70-75%	5620 Riverside	9.6	82.4	8	24.8	45.7	12	0.4	13.3	3.8
6107000800	36.18	70.29	70-75%	7416 Tulare	17.6	73.2	9.2	67.5	29.9	0.2	0.8	0.6	0.9
6071002103	36.18	70.27	70-75%	4646 San Bernardino	17.5	78.2	4.3	45.2	32.2	12.1	0.3	6.2	4
6067006701	36.17	70.26	70-75%	8370 Sacramento	17.5	74	8.5	38.1	23	15.9	0.4	18.5	4.1
6069000300	36.15	70.25	70-75%	4217 San Benito	17.5	74.1	8.4	87.1	9.9	0.3	0.5	1.6	0.6
6037275603	36.14	70.24	70-75%	2711 Los Angeles	8.5	73	18.5	34.9	34.9	3.8	0.3	22.2	4
6065040809	36.14	70.22	70-75%	3353 Riverside	15.1	77	7.9	43.8	34.3	6.5	0.3	13	2.1
6001423200	36.09	70.21	70-75%	2794 Alameda	11.9	81.2	6.9	31.7	32	22.2	0.1	8.9	5.1
6019007801	36.09	70.20	70-75%	2722 Fresno	19.1	75.4	5.5	96.7	2.1	0	0.1	0.9	0.1
6057000501	36.09	70.19	70-75%	6034 Nevada	10	64.4	25.6	9.2	85.4	0.2	1.1	1.2	2.8
6071002037	36.08	70.17	70-75%	7739 San Bernardino	14.2	80.7	5.1	42.7	22.9	15.9	0.3	15.3	2.9
6065045609	36.08	70.16	70-75%	5880 Riverside	19.1	73.5	7.4	93.2	5.4	0.1	0.4	0.4	0.5
6037207101	36.08	70.15	70-75%	3047 Los Angeles	5.5	74.4	20.1	11.8	11	4.9	0.1	69.8	2.5
6037402705	36.08	70.13	70-75%	3328 Los Angeles	14.5	76.4	9.1	74.1	12.9	6.2	0.1	5.2	1.5
6071003405	36.07	70.12	70-75%	5109 San Bernardino	21.9	74	4.1	70.6	9.3	16.5	0.2	1.6	1.7
6097153002	36.07	70.11	70-75%	6827 Sonoma	16	76.6	7.4	53.2	38.6	2.1	0.9	2.7	2.5
6019004100	36.06	70.10	70-75%	3306 Fresno	16.7	72.3	11	60	26.7	0.2	0.5	11.7	0.9
6001436900	36.05	70.08	70-75%	6724 Alameda	18.3	74.2	7.5	62.5	13	7.5	0.2	14.5	2.3
6037104124	36.04	70.07	70-75%	4175 Los Angeles	12.7	78	9.3	50.8	28.1	13.6	0.4	5.6	1.5
6037201301	36.03	70.06	70-75%	3442 Los Angeles	14	73.9	12.1	79.8	5.1	1.9	0.3	11.9	0.9
6037502801	36.03	70.05	70-75%	6186 Los Angeles	11.7	76.7	11.6	75.7	17.6	0.9	0.3	4.3	1.2
6053010504	36.03	70.03	70-75%	4732 Monterey	17.6	75.6	6.8	71.4	16.4	2.4	0.3	7.2	2.2
6037128910	36.01	70.02	70-75%	4083 Los Angeles	11	78.4	10.6	14.2	65.3	7	0	8	5.4
6037401704	36.00	70.01	70-75%	5828 Los Angeles	13.6	71.2	15.2	58.2	20.9	9.9	0.3	8.3	2.4
6071010026	35.99	70.00	65-70%	10495 San Bernardino	19.2	70.8	10	40.8	34.8	16.1	0.4	4.8	3.2
6037551202	35.99	69.98	65-70%	7666 Los Angeles	14.8	75.2	10	73.2	15.6	3.7	0.1	6.3	1.1
6099000506	35.99	69.97	65-70%	4295 Stanislaus	13	72.9	14.1	28.5	58.2	4.6	0.6	4.5	3.6
6037113401	35.99	69.96	65-70%	5543 Los Angeles	11.5	74.2	14.3	40.3	36.1	3.6	0.1	17.2	2.7
6047002301	35.98	69.95	65-70%	6680 Merced	15.4	72.9	11.7	45.7	43.6	3.2	0.4	4.7	2.4
6037401603	35.96	69.93	65-70%	2913 Los Angeles	7.2	55.7	37.1	26.5	65.8	1.5	0.1	4.1	1.9
6107002204	35.94	69.92	65-70%	6126 Tulare	18.7	73.8	7.5	67.9	24.4	3.8	0.5	1.7	1.8
6037535802	35.93	69.91	65-70%	6814 Los Angeles	15	77.5	7.5	96.2	2.5	0.5	0.3	0.2	0.2
6037408211	35.93	69.90	65-70%	5947 Los Angeles	9.4	79	11.6	34.1	7.7	1.2	0.1	55.6	1.3
6037603301	35.92	69.88	65-70%	3828 Los Angeles	11.4	70	18.6	25.9	9	6.6	0.1	54.7	3.8
6037555103	35.90	69.87	65-70%	4727 Los Angeles	13.5	76.7	9.8	29.4	23.4	14.6	0.1	29	3.5
6037552001	35.89	69.86	65-70%	4105 Los Angeles	13.1	76.3	10.6	73.3	12.1	2.9	0.4	10.2	1.1
6115040500	35.89	69.84	65-70%	4111 Yuba	18.1	73.4	8.5	38.4	46.1	2.1	2.6	5.3	5.6
6037480902	35.87	69.83	65-70%	4218 Los Angeles	11.5	78.9	9.6	37	4.4	1	0.2	56.2	1.2
6065043309	35.87	69.82	65-70%	2890 Riverside	17.9	67.8	14.3	44.3	44.6	7.2	0.5	1.3	2.1
6001400700	35.87	69.81	65-70%	4206 Alameda	9.2	78.7	12.1	10.4	29.5	49.2	0.3	6.3	4.3
6037430002	35.87	69.79	65-70%	7021 Los Angeles	11.2	73.9	14.9	41.1	28.6	8.5	0.2	19.3	2.3
6071007302	35.87	69.78	65-70%	10039 San Bernardino	10	70.5	19.5	16.3	43.9	5.7	0.2	30.1	3.7
6095251500	35.86	69.77	65-70%	3555 Solano	16.4	76.1	7.5	40.1	24	21.9	0.5	8.5	5
6075026403	35.84	69.76	65-70%	4140 San Francisco	10.2	74.5	15.3	16.2	6.5	4.7	0.2	70.8	1.6
6031000403	35.83	69.74	65-70%	5281 Kings	16.4	73.7	9.9	37.2	42.6	6.4	0.7	8.7	4.4
6019004215	35.81	69.73	65-70%	4475 Fresno	17.9	76.2	5.9	35.3	40	7	0.4	14.3	3
6067005505	35.81	69.72	65-70%	4550 Sacramento	15.5	73.2	11.3	33.7	41.1	13	0.6	6.6	4.9
6073015801	35.78	69.71	65-70%	3550 San Diego	16.5	76.3	7.2	37.4	41.6	11.4	0.8	2.8	5.9
6059074701	35.77	69.69	65-70%	8346 Orange	18.3	76.9	4.8	94.4	1.7	0.7	0.2	2.8	0.3
6037900102	35.73	69.68	65-70%	1029 Los Angeles	13.8	71.9	14.3	52.1	37.9	5.2	0.5	1.7	2.6
6071008100	35.71	69.67	65-70%	3182 San Bernardino	14.5	77.2	8.3	30.7	49.5	7.5	0.8	8	3.5
6037406411	35.70	69.66	65-70%	2126 Los Angeles	12.7	76.7	10.6	66.5	15	2.5	0.3	14.5	1.2
6037555002	35.69	69.64	65-70%	3475 Los Angeles	12.3	80.4	7.3	42.3	26.3	10.6	0.5	16.7	3.6
6001433300	35.69	69.63	65-70%	6834 Alameda	11.4	73.2	15.4	25	27.3	3.7	0.3	40	3.7
6065051200	35.68	69.62	65-70%	3403 Riverside	12.4	73.9	13.7	33.6	55.5	1.5	0.4	6.3	2.6
6037404501	35.68	69.61	65-70%	2355 Los Angeles	16.1	76.3	7.6	82.1	11.3	1	0.4	4.3	1
6081600200	35.67	69.59	65-70%	4154 San Mateo	12.3	75.8	11.9	30.4	5.2	5.8	0	55.5	3.1
6037530202	35.66	69.58	65-70%	4063 Los Angeles	11.9	72.9	15.2	87.8	5.9	0.3	0.2	5.2	0.5
6037534700	35.65	69.57	65-70%	4283 Los Angeles	14.2	77	8.8	97	2	0	0	0.8	0.1
6059074106	35.65	69.55	65-70%	6015 Orange	15.1	79	5.9	62.9	20.8	2.2	0.2	11.7	2.1
6037571600	35.65	69.54	65-70%	2039 Los Angeles	25.9	66.5	7.6	37.4	4.5	52.5	0.1	2.8	2.7
6065042730	35.65	69.53	65-70%	5338 Riverside	15.6	76.5	7.9	63.9	30.5	2.2	0.3	1.7	1.5
6067006600	35.63	69.52	65-70%	6166 Sacramento	17.9	75.5	6.6	32	30	15.8	1.2	15.7	5.3
6037139401	35.62	69.50	65-70%	2645 Los Angeles	10.6	74.2	15.2	22	60	4.9	0.5	7.2	5.5
6037554900	35.61	69.49	65-70%	6991 Los Angeles	10.6	74.5	14.9	26.6	24.2	3.5	0.3	42.9	2.5
6111005002	35.59	69.48	65-70%	3003 Ventura	21.5	74.4	4.1	89.9	8.7	0.2	0.3	0.5	0.4
6037139301	35.58	69.47	65-70%	4462 Los Angeles	11	71.7	17.3	9.5	76.1	3.6	0.1	6.9	3.7
6037431200	35.57	69.45	65-70%	6439 Los Angeles	15.1	76.9	8	73.7	10.6	7.8	0.1	6.5	1.3
6037603600	35.56	69.44	65-70%	4037 Los Angeles	11.1	76.8	12.1	32.4	25.5	6.9	0.2	31.7	3.4
6041112202	35.56	69.43	65-70%	4217 Marin	15.9	75.4	8.7	61.4	23.1	1.4	0.1	11.9	2.1
6071003611	35.56	69.42	65-70%	4575 San Bernardino	19.6	76.7	3.7	76.2	6.2	10.9	0.2	5.3	1.2
6037482600	35.56	69.40	65-70%	6866 Los Angeles	9.4	67.6	23	25.3	8	0.3	0.1	64.2	2
6085503217	35.54	69.39	65-70%	4512 Santa Clara	18.4	76.3	5.3	66.7	3.7	3	0.3	25.1	1.2
6037480903	35.51	69.38	65-70%	3206 Los Angeles	8.6	73.6	17.8	32.3	10.4	1.6	0.3	54.6	1
6001425102	35.50	69.37	65-70%	2807 Alameda	6.2	87.1	6.7	7.4	35.1	14.8	0.2	37.8	4.7
6037576601	35.49	69.35	65-70%	4399 Los Angeles	5.7	85.2	9.1	25.8	48.8	13.6	0.5	7.5	3.8
6037119900	35.49	69.34	65-70%	4940 Los Angeles	13.5	77.4	9.1	64	11.7	1.3	0.1	21.3	1.6
6037571704	35.49	69.33	65-70%	4107 Los Angeles	17.7	76.9	5.4	59.6	7	16.2	0.3	15	1.9
6067009639	35.47	69.32	65-70%	3554 Sacramento	16.3	73.6	10.1	19.1	21.5	16.7	0.2	37.3	5.2
6071002705	35.46	69.30	65-70%	5513 San Bernardino	14.2	75.9	9.9	56.6	17.5	19.8	0.4	3.4	2.2
6037123700	35.46	69.29	65-70%	4114 Los Angeles	11.5	75.2	13.3	29.5	56.7	3.1	0.1	7.9	2.8
6077003109	35.46	69.28	65-70%	5630 San Joaquin	13.5	71.8	14.7	32.1	49.8	7.5	0.7	6.1	3.8
6107003801	35.43	69.26	65-70%	3077 Tulare	19.6	68.4	12	58.6	36.1	0.5	0.8	2.5	1.4
6059074803	35.42	69.25	65-70%	9053 Orange	15.3	76.9	7.8	77.8	4.6	0.9	0.1	16.1	0.5
6067001300	35.42	69.24	65-70%	3005 Sacramento	3.6	92.3	4.1	17.1	66.7	5.6	0.8	5.9	3.8
6019005606	35.40	69.23	65-70%	3847 Fresno	14.7	75	10.3	22.9	61	1.9	1	10.5	2.7
6073010110	35.40	69.21	65-70%	7298 San Diego	15.2	74.3	10.5	63.5	11.9	3.1	0.1	18.7	2.7
6099000201	35.40	69.20	65-70%	5908 Stanislaus	12.8	71.5	15.7	18.8	76.9	0.4	0.8	0.8	2.3
6065046102	35.40	69.19	65-70%	2027 Riverside	20.5	71.6	7.9	67.6	18.6	10.7	0.7	1.1	1.3
6067002700	35.40	69.18	65-70%	3383 Sacramento	14.1	79.7	6.2	31.1	32.2	24.9	0.5	6	5.4
6037113234	35.39	69.16	65-70%	4667 Los Angeles	14.3	73.9	11.8	55	23.8	3.4	0.2	15.7	1.8
6037235100	35.38	69.15	65-70%	4520 Los Angeles	10.2	75.2	14.6	18.9	4.2	71	0.1	1.8	4
6037602404	35.36	69.14	65-70%	5863 Los Angeles	15.2	77.4	7.4	58.2	9.8	18.5	0.1	11.3	2.1
6037540201	35.36	69.13	65-70%	2370 Los Angeles	20.2	76.6	3.2	96.7	1.3	0.9	0.4	0.4	0.3
6037407301	35.35	69.11	65-70%	4828 Los Angeles	13.7	76.3	10	82.3	6.5	1.4	0.2	8.9	0.7
6075022802	35.35	69.10	65-70%	2099 San Francisco	6.6	81.9	11.5	31.5	39.8	5.1	0.7	19.2	3.7
6053014601	35.35	69.09	65-70%	5232 Monterey	16.5	75	8.5	77.6	17.3	0.5	0.3	2.9	1.5
6081610202	35.34	69.08	65-70%	2429 San Mateo	5.8	85.4	8.8	40.5	30.8	10.6	0.5	12.9	4.8
6031001500	35.34	69.06	65-70%	4619 Kings	18.2	71.7	10.1	74.3	18.8	3.3	0.5	1.8	1.3
6037207900	35.33	69.05	65-70%	4163 Los Angeles	4.7	87.2	8.1	24	27.8	7.7	0.2	37.6	2.7
6037293304	35.32	69.04	65-70%	4178 Los Angeles	16	76.7	7.3	63	15.2	7.1	0.2	12.3	2.3
6059063701	35.32	69.03	65-70%	6266 Orange	17.6	75	7.4	77.7	16.4	1	0.2	3.7	1.1
6065042406	35.31	69.01	65-70%	4150 Riverside	14.9	75.2	9.9	56.6	23.2	13.8	0.1	3.7	2.6

6047000402	35.31	69.00	65-70%	8071 Merced	13.9	72.9	13.2	21.3	74.7	0.3	0.3	1.4	2
6037600702	35.31	68.99	65-70%	4191 Los Angeles	11.8	75	13.2	18.4	2	75.6	0.2	1.2	2.6
6037572400	35.29	68.97	65-70%	1152 Los Angeles	12	75.6	12.4	37.8	5.1	31.6	0.3	23.1	2
6071025100	35.26	68.96	65-70%	1688 San Bernardino	11.1	64.7	24.2	19.9	52	1.1	22	0.5	4.4
6037113421	35.26	68.95	65-70%	6109 Los Angeles	14.2	79.1	6.7	52	23.1	8.7	0.2	13.3	2.6
6059088001	35.25	68.94	65-70%	5004 Orange	12.4	76.6	11	35.8	25.9	1.4	0.2	34.9	1.9
6075025702	35.25	68.92	65-70%	4665 San Francisco	10.1	75.9	14	24.5	10	2.1	0.2	61.8	1.3
6037310400	35.25	68.91	65-70%	3379 Los Angeles	10.4	76.4	13.2	23.7	61	1	0.2	10.9	3.3
6071000501	35.24	68.90	65-70%	6785 San Bernardino	13.8	76.9	9.3	58.7	27.4	2.3	0.2	9.9	1.6
6065040812	35.23	68.89	65-70%	3480 Riverside	13	75	12	36.9	59.2	1	0.3	1.2	1.4
6029004401	35.22	68.87	65-70%	7308 Kern	19.1	72.7	8.2	79.6	16.3	2.1	0.5	0.7	0.8
6037900701	35.21	68.86	65-70%	5289 Los Angeles	16.9	73.8	9.3	39.6	33.4	20.3	0.4	2.5	3.8
6037119400	35.21	68.85	65-70%	4987 Los Angeles	13.7	78.1	8.2	81.8	7.7	1.3	0.3	7.6	1.3
6037432902	35.20	68.84	65-70%	3482 Los Angeles	11.9	74.1	14	39.9	7.4	0.3	0.1	51.4	0.8
6037195901	35.20	68.82	65-70%	2235 Los Angeles	6.9	82.6	10.5	38.1	43.9	3.9	0.3	10.8	3
6037211120	35.19	68.81	65-70%	5194 Los Angeles	9.5	82.2	8.3	27.6	6.1	3.9	0.1	60.7	1.6
6037132502	35.18	68.80	65-70%	3672 Los Angeles	11	75.3	13.7	40	43.5	3.4	0.1	9.4	3.4
6007003002	35.18	68.79	65-70%	3531 Butte	14.8	75.6	9.6	12.8	59.9	3.4	4	13.5	6.3
6065040901	35.17	68.77	65-70%	6516 Riverside	16.1	78.3	5.6	47.3	27.3	8.3	0.5	13.8	2.8
6059074102	35.17	68.76	65-70%	6819 Orange	15.8	77.4	6.8	84.4	4.2	0.9	0.1	10.2	0.4
6099002803	35.17	68.75	65-70%	2866 Stanislaus	12.2	67.7	20.1	26	64.5	3.2	1	3.6	1.7
6037106649	35.16	68.74	65-70%	2853 Los Angeles	14.1	76.8	9.1	63.9	9.6	3.7	0.3	21	1.5
6013307202	35.16	68.72	65-70%	3933 Contra Costa	21.3	75.2	3.5	46.2	14.1	29.6	0.3	5.9	4
6037115202	35.16	68.71	65-70%	4828 Los Angeles	10.2	80.7	9.1	33.2	36.6	6.3	0.3	20	3.6
6071007408	35.14	68.70	65-70%	4181 San Bernardino	20.9	73.1	6	60	16	17.5	0.5	4	1.9
6081610500	35.14	68.68	65-70%	4963 San Mateo	17.1	76.3	6.6	80.9	12.5	1.1	0.2	4.3	1
6037208501	35.14	68.67	65-70%	2656 Los Angeles	11.4	77.9	10.7	44.4	4.6	1.7	0.2	47	2.1
6113010201	35.14	68.66	65-70%	2538 Yolo	9.8	76.3	13.9	27.6	61.5	1.3	1.3	5	3.2
6075023003	35.13	68.65	65-70%	4093 San Francisco	10.6	76.8	12.6	23.5	6.9	24.8	0.1	42.4	2.3
6021010400	35.12	68.63	65-70%	7636 Glenn	16	71	13	30.9	60	0.9	1.8	4.4	2
6067004100	35.10	68.62	65-70%	5015 Sacramento	15	72.1	12.9	32.8	17.7	15.5	0.6	28.5	4.9
6037701701	35.09	68.61	65-70%	3196 Los Angeles	7.2	79.8	13	15.9	64	2.8	0.1	12.4	4.8
6037502901	35.08	68.60	65-70%	5413 Los Angeles	12.4	77.6	10	78.6	15.2	0.7	0.2	3.8	1.5
6071002305	35.07	68.58	65-70%	10725 San Bernardino	16.1	78.8	5.1	62.5	16.6	10.6	0.2	8.3	1.9
6037132900	35.06	68.57	65-70%	3461 Los Angeles	10.6	74.6	14.8	22.1	62	2.9	0.4	8	4.4
6013316000	35.06	68.56	65-70%	1483 Contra Costa	5.5	89.4	5.1	20.9	52.3	18.8	0.8	3.5	3.6
6059087703	35.06	68.55	65-70%	6246 Orange	13.8	77.7	8.5	56.4	19.6	0.7	0.2	21	2.2
6077005303	35.04	68.53	65-70%	4694 San Joaquin	17.5	73.6	8.9	57	32.6	4.3	0.5	3	2.6
6073016617	35.02	68.52	65-70%	3102 San Diego	11.9	66.3	21.8	19.1	71	2.3	0.7	3.8	3.1
6037212305	35.02	68.51	65-70%	2865 Los Angeles	15.1	80.5	4.4	74.5	3.5	3.6	0.1	17.2	1.1
6001402600	35.00	68.50	65-70%	1151 Alameda	7.9	66.5	25.6	5.7	11.3	29.5	0.3	50.7	2.4
6077004102	34.99	68.48	65-70%	8072 San Joaquin	15.4	73.5	11.1	25.9	28.5	6.6	0.3	35.5	3.2
6037211804	34.98	68.47	65-70%	3221 Los Angeles	10.5	80.5	9	23.4	6	4	0	64.7	1.8
6075026401	34.98	68.46	65-70%	4044 San Francisco	11.1	74.6	14.3	19.7	4.2	9.9	0.2	64.4	1.7
6081611800	34.98	68.44	65-70%	4433 San Mateo	16.7	75.9	7.4	63.1	1.8	20.8	0.1	12	2.2
6039000604	34.97	68.43	65-70%	5467 Madera	22.2	72.7	5.1	89.5	6.3	2.6	0.5	0.4	0.7
6047001004	34.96	68.42	65-70%	3968 Merced	13.5	68.3	18.2	35.5	42.4	10.9	0.5	7.7	2.9
6075061400	34.96	68.41	65-70%	5395 San Francisco	14	79.2	6.8	16.9	46.2	16.4	0.4	15.6	4.5
6067007004	34.95	68.39	65-70%	7533 Sacramento	17.5	79.2	3.3	43.2	21.5	17.3	0.4	12.8	4.8
6065042744	34.94	68.38	65-70%	3726 Riverside	15.5	75.8	8.7	56.5	39.8	0.8	0.9	0.3	1.6
6037702803	34.94	68.37	65-70%	2963 Los Angeles	10.8	75.1	14.1	43.6	42	3.2	0	8.1	3.2
6065040904	34.93	68.36	65-70%	3655 Riverside	14.2	76.4	9.4	64.3	25.3	3.3	0.9	4.7	1.6
6059011722	34.93	68.34	65-70%	2363 Orange	8.1	61.2	30.7	28.1	50.1	2.9	0.5	17.1	1.3
6037406602	34.93	68.33	65-70%	4973 Los Angeles	13.1	75.5	11.4	63.7	14	3.1	0	18.1	1.1
6059089105	34.93	68.32	65-70%	6387 Orange	20.7	75.5	3.8	87.8	1.4	0.1	0	10.3	0.2
6037480803	34.90	68.31	65-70%	3464 Los Angeles	11.6	74.7	13.7	58.9	13	1	0	25.2	1.9
6111004716	34.90	68.29	65-70%	4476 Ventura	16.9	76	7.1	80	6.6	1	0	11.4	1
6001405901	34.89	68.28	65-70%	3910 Alameda	15.4	76.1	8.5	40	2.9	13.6	0.5	40.7	2.3
6037131702	34.89	68.27	65-70%	3751 Los Angeles	12.4	78.3	9.3	53.1	27.2	5.3	0.1	12.8	1.5
6037189102	34.89	68.26	65-70%	3096 Los Angeles	4.6	80	15.4	11.3	71.5	2	0.2	11.8	3.2
6037134101	34.88	68.24	65-70%	4922 Los Angeles	13	75.6	11.4	41.1	26.4	3.6	0.1	25.9	2.9
6037199300	34.88	68.23	65-70%	3848 Los Angeles	12.6	75.9	11.5	67.2	17.1	2.7	0.5	10.4	2.2
6037201503	34.88	68.22	65-70%	3323 Los Angeles	18	73.4	8.6	91.8	2.6	0.3	0	4.9	0.4
6073012402	34.88	68.21	65-70%	5445 San Diego	16	73.1	10.9	68.6	19.2	4.7	0.3	4.8	2.4
6013314200	34.87	68.19	65-70%	6482 Contra Costa	18.1	75.9	6	69.1	19.6	3.5	0.2	5.3	2.3
6065040606	34.87	68.18	65-70%	3329 Riverside	18	75.6	6.4	77.1	20.6	0.9	0.2	0.4	0.7
6059086901	34.87	68.17	65-70%	8725 Orange	16.3	73.6	10.1	50.1	23.7	4.3	0.3	19.2	2.5
6029006301	34.86	68.15	65-70%	4004 Kern	17.5	73.4	9.1	90.1	7.9	0.4	0.2	0.7	0.6
6037107020	34.85	68.14	65-70%	5404 Los Angeles	17	77.3	5.7	85.3	5.6	1	0.4	6.4	1.3
6053001300	34.85	68.13	65-70%	2548 Monterey	17.4	74.7	7.9	79.6	12.2	2.3	0.7	3.7	1.6
6065042509	34.85	68.12	65-70%	3193 Riverside	15.3	76.1	8.6	64.9	18.6	9.9	0.1	4.4	2.1
6085503204	34.84	68.10	65-70%	8175 Santa Clara	16.8	75.7	7.5	55.7	7.9	3.1	0.2	31.6	1.5
6107000402	34.84	68.09	65-70%	7002 Tulare	18.5	71.6	9.9	74.6	21.1	0.2	0.3	2.7	1.1
6037407400	34.83	68.08	65-70%	2133 Los Angeles	11.5	75.7	12.8	52.8	7.7	3.4	0.2	34.3	1.5
6065040202	34.83	68.07	65-70%	2821 Riverside	15.1	74.6	10.3	48.7	42.3	4.2	0.6	2.3	1.8
6037551000	34.81	68.05	65-70%	7200 Los Angeles	12.5	74.8	12.7	63.8	23.9	1.8	0.1	9	1.4
6037189902	34.81	68.04	65-70%	4971 Los Angeles	3	86.3	10.7	10.3	75.9	4.1	0.2	6.1	3.5
6037900806	34.81	68.03	65-70%	3620 Los Angeles	14.8	65.7	19.5	34.3	31.5	27.3	0.9	2.2	3.8
6071000113	34.80	68.02	65-70%	11112 San Bernardino	14.7	77	8.3	50.6	27	2.7	0.4	17.1	2.3
6037702600	34.80	68.00	65-70%	6069 Los Angeles	11.1	68.5	20.4	17.8	53.1	5	0.2	18.4	5.4
6077004402	34.80	67.99	65-70%	4998 San Joaquin	15.9	74.7	9.4	36	51.3	0.9	0.6	8.2	2.9
6107002008	34.79	67.98	65-70%	2769 Tulare	16.8	65.1	18.1	45.3	46.4	3.8	0.8	1.6	2.1
6037117202	34.78	67.97	65-70%	2471 Los Angeles	10	75.6	14.4	36.9	31	4.5	0.1	25.2	2.3
6037201200	34.78	67.95	65-70%	2519 Los Angeles	15.6	76.3	8.1	89.3	3	0.4	0.1	6.9	0.2
6059087103	34.78	67.94	65-70%	8470 Orange	14	75.6	10.4	44	25.5	2.1	0.4	25.9	2
6037501300	34.78	67.93	65-70%	7238 Los Angeles	13.2	76.2	10.6	74.2	21.7	0.5	0.2	2.2	1.2
6001406500	34.76	67.92	65-70%	5930 Alameda	15	76.9	8.1	44	8.5	19.7	0.5	24.5	2.9
6037910403	34.76	67.90	65-70%	2235 Los Angeles	25.9	71	3.1	77.4	9.1	11.1	0	0.8	1.6
6059074806	34.75	67.89	65-70%	5057 Orange	20.4	74.5	5.1	94.3	1.2	1.7	0.1	2.5	0.1
6077003217	34.73	67.88	65-70%	3201 San Joaquin	18.8	74.3	6.9	33.9	19	19.3	0.2	22.8	4.9
6037212410	34.72	67.86	65-70%	3903 Los Angeles	11.2	81	7.8	47.8	6.4	3.3	0.1	41.2	1.2
6037134103	34.71	67.85	65-70%	4193 Los Angeles	12.5	73.6	13.9	42	33.5	4.7	0.1	17.7	2
6065041904	34.70	67.84	65-70%	4786 Riverside	13.9	77.4	8.7	41.2	48	2.1	0.7	5.7	2.3
6019004409	34.70	67.83	65-70%	3486 Fresno	12.7	75.7	11.6	32	54.2	4	0.7	6.1	3
6037218110	34.70	67.81	65-70%	3453 Los Angeles	13.2	77.5	9.3	54.6	5.6	23.2	0.1	14.5	1.9
6077005307	34.69	67.80	65-70%	3214 San Joaquin	17.3	75.7	7	45.5	34.5	6.3	0.5	8.6	4.6
6059086305	34.68	67.79	65-70%	4006 Orange	10.2	74	15.8	42.3	38.4	1.2	0.2	16.6	1.3
6037134303	34.68	67.78	65-70%	5057 Los Angeles	11.9	74.6	13.5	35.3	42.4	3	0.2	15.6	3.6
6059052410	34.68	67.76	65-70%	5403 Orange	10.4	71	18.6	29.1	53.4	1.4	0.4	13.4	2.4
6085503207	34.67	67.75	65-70%	3938 Santa Clara	12.5	77.4	10.1	19.7	7.5	2.6	0.2	68.9	1
6001427200	34.67	67.74	65-70%	4107 Alameda	9.6	79.3	11.1	14.4	39.4	5.3	0.6	34.7	5.6
6007001000	34.67	67.73	65-70%	4801 Butte	6.1	90	3.9	15.7	77.1	1.2	0.8	1.6	3.6
6101050501	34.66	67.71	65-70%	6182 Sutter	14	75	11	23	36.4	1.8	1.2	32.9	4.7
6019001412	34.63	67.70	65-70%	2790 Fresno	13.5	74.6	11.9	32.7	38.5	3.7	0.7	22.1	2.4
6065031501	34.62	67.69	65-70%	7387 Riverside	11.8	78.5	9.7	46.1	40.5	5.5	0.5	4.1	3.2
6037212610	34.62	67.68	65-70%	4074 Los Angeles	9.4	79.6	11	33	8.1	5	0	52.1	1.8
6073014803	34.61	67.66	65-70%	4690 San Diego	9	70.2	20.8	16.3	65.7	5.9	0.3	7.4	4.3
6037311100	34.60	67.65	65-70%	3897 Los Angeles	10.6	76.3	13.1	39.1	45.7	1.8	0.3	10.8	2.3
6071010014	34.59	67.64	65-70%	4800 San Bernardino	20.8	73.2	6	66.1	23.6	6.5	0.5	1.4	2
6067007403	34.59	67.63	65-70%	4537 Sacramento	15.4	73.9	10.7	28.7	50	9.3	0.8	5.4	5.8
6059099223	34.57	67.61	65-70%	5102 Orange	11.9	71.7	16.4	16.1	17.8	0.5	0.2	63.5	1.9
6073010012	34.57	67.60	65-70%	4581 San Diego	15.8	76.4	7.8	94.8	2.4	0.7	0.1	1.5	0.5
6037481201	34.57	67.59	65-70%	3598 Los Angeles	10.6	77.5	11.9	23	16.1	0.9	0.1	58.3	1.6
6077003106	34.56	67.57	65-70%	3600 San Joaquin	11.8	65.2	23	22.8	58.4	6.4	0.3	8.1	3.9
6071003605	34.56	67.56	65-70%	4223 San Bernardino	16.6	78.2	5.2	73.5	12.3	9.4	0.2	3	1.6
6037404202	34.55	67.55	65-70%	3366 Los Angeles	12.3	80.6	7.1	57.5	27.9	3.3	0.3	8.7	2.3
6037141302	34.55	67.54	65-70%	5504 Los Angeles	8.4	80.4	11.2	11.7	70.5	5.5	0.1	8.4	3.7
6001444500	34.54	67.52	65-70%	6696 Alameda	16.6	76.3	7.1	39.9	19.1	5.5	0.2	31.3	4
6071011900	34.54	67.51	65-70%	3567 San Bernardino	13.3	73.3	13.4	34.7	56.9	3.4	1.1	1.6	2.4
6071012101	34.51	67.50	65-70%	5565 San Bernardino	11.7	69.7	18.6	21.8	61	9.3	0.6	4	3.3
6085501700	34.50	67.49	65-70%	4916 Santa Clara	17.5	77.6	4.9	84	9.8	1.7	0.2	3.2	1.1
6037407101	34.50	67.47	65-70%	4834 Los Angeles	15.5	74.6	9.9	89.7	4.6	0.5	0.3	4.3	0.7
6001405902	34.49	67.46	65-70%	3035 Alameda	12.6	77.1	10.3	23.2	5.8	14.2	0.2	53.7	3

6101050900	34.46	67.45	65-70%	1561 Sutter	13.2	73.8	13	40.1	53.5	0.2	2.4	1.6	2.2
6037551300	34.46	67.44	65-70%	5422 Los Angeles	13.4	72.7	13.9	71.9	18	3.9	0.2	4.9	1
6065040902	34.45	67.42	65-70%	5040 Riverside	9.6	74.7	15.7	39.8	42.8	4.5	0.4	10.2	2.4
6059088402	34.45	67.41	65-70%	4854 Orange	15.2	76.6	8.2	58.4	16.7	1.6	0.1	21.7	1.5
6067007202	34.44	67.40	65-70%	4065 Sacramento	12.8	76.2	11	21.2	65.3	3	0.6	6.9	3
6031000402	34.42	67.39	65-70%	5280 Kings	14.8	75.7	9.5	39	45.8	5.8	0.5	5.6	3.3
6065050900	34.41	67.37	65-70%	4340 Riverside	11.8	82.8	5.4	26.3	43.5	10.6	0.3	15.6	3.8
6013313206	34.40	67.36	65-70%	5757 Contra Costa	17.7	74.3	8	57	12.6	14.9	0.2	11.6	3.7
6077001101	34.40	67.35	65-70%	4931 San Joaquin	14.1	73.9	12	39.2	42.1	5.4	0.7	8.1	4.4
6037532102	34.37	67.34	65-70%	3574 Los Angeles	13.9	73.3	12.8	87.6	6.9	0.1	0.1	4.9	0.4
6039000700	34.37	67.32	65-70%	10776 Madera	15.1	70.6	14.3	50	42.1	2.1	0.7	3.2	1.9
6073016504	34.36	67.31	65-70%	6253 San Diego	15.4	77.4	7.2	30.9	51.2	9.2	0.3	3.9	4.4
6057000600	34.36	67.30	65-70%	6237 Nevada	12	69.1	18.9	10	83.2	0.4	1.1	1.6	3.6
6059075202	34.36	67.28	65-70%	5753 Orange	17.3	74.8	7.9	91.9	3.7	1	0.2	2.8	0.3
6031001401	34.35	67.27	65-70%	3002 Kings	19.7	75	5.3	85.3	11.1	1.7	0.1	0.8	1
6085503709	34.35	67.26	65-70%	5088 Santa Clara	13.6	75.4	11	35.3	2.1	1.1	0.1	60.3	1.1
6073004600	34.35	67.25	65-70%	1940 San Diego	5.3	89.5	5.2	33.4	53	5.7	0.5	4.1	3.4
6037211910	34.34	67.23	65-70%	4657 Los Angeles	13.6	81.4	5	61.4	7.4	5.9	0.2	23.3	1.8
6065044200	34.33	67.22	65-70%	5701 Riverside	19.5	73.8	6.7	56.3	17.9	16.1	1.4	5.3	2.9
6037554522	34.33	67.21	65-70%	4787 Los Angeles	9.2	71.9	18.9	15.9	20.3	6.6	0.3	53.5	3.5
6085503712	34.31	67.20	65-70%	4108 Santa Clara	14.8	67.2	18	45	5.6	2.7	0.2	44.4	2.1
6019006603	34.29	67.18	65-70%	2047 Fresno	16.2	73.1	10.7	61.7	30.7	2.6	0.3	3.5	1.1
6073016000	34.25	67.17	65-70%	2419 San Diego	11.5	75.9	12.6	24.9	62.5	3.6	0.2	4.1	4.8
6059075302	34.25	67.16	65-70%	4481 Orange	14.7	77.3	8	79.2	13.3	1.7	0.1	5	0.8
6065045703	34.25	67.15	65-70%	5708 Riverside	20.7	74.5	4.8	98	1.3	0.2	0.1	0.3	0.1
6067008908	34.24	67.13	65-70%	4835 Sacramento	11.6	69	19.4	21.6	59.9	6.3	0.7	7.3	4.2
6065041406	34.24	67.12	65-70%	5968 Riverside	16.1	79.4	4.5	44.4	31.9	8.6	0.3	11.9	2.9
6013302007	34.22	67.11	65-70%	6347 Contra Costa	16.2	76.1	7.7	40.2	42.4	6.8	0.4	6.6	3.6
6083000804	34.22	67.10	65-70%	7189 Santa Barbara	13.6	78.4	8	71.3	23.1	2.1	0.7	1.4	1.3
6037462002	34.21	67.08	65-70%	3942 Los Angeles	17.3	76.2	6.5	69.1	6.8	18.8	0.1	4.3	0.8
6095252606	34.21	67.07	65-70%	5148 Solano	17.2	71.7	11.1	44.4	21.5	16.9	0.1	11.5	5.6
6025012301	34.19	67.06	65-70%	5633 Imperial	2.9	93.2	3.9	51.1	19.3	27.5	0.4	1.2	0.5
6001400800	34.19	67.05	65-70%	3594 Alameda	9.4	78.3	12.3	10.2	31.6	40.7	0.4	12.1	5
6077004302	34.18	67.03	65-70%	5718 San Joaquin	13.9	65.7	20.4	31.3	60	0.7	0.4	5.4	2.2
6037132501	34.18	67.02	65-70%	3763 Los Angeles	11.1	69.7	19.2	47.8	36.2	3	0.2	10.9	1.9
6059089104	34.18	67.01	65-70%	5376 Orange	18.3	74.6	7.1	71.3	5.2	0.6	0.1	22.2	0.5
6071004505	34.17	66.99	65-70%	4724 San Bernardino	17.6	74.5	7.9	49.3	30.9	15.1	0.7	1.1	2.9
6085503401	34.17	66.98	65-70%	4915 Santa Clara	17.9	74.8	7.3	81.3	2.5	1.4	0.1	14	0.8
6037701802	34.15	66.97	65-70%	4463 Los Angeles	8.3	82.8	8.9	32.7	41.7	13.7	0.2	8.3	3.4
6059011504	34.15	66.96	65-70%	5473 Orange	5.1	92.6	2.3	25.4	41	5	0.3	24	4.2
6099001001	34.14	66.94	65-70%	6042 Stanislaus	11.4	70.8	17.8	22.9	68.6	2.4	0.5	3.1	2.7
6107002602	34.13	66.93	65-70%	5561 Tulare	20.1	72.1	7.8	84.3	11.1	0.1	0.1	3.9	0.5
6013307102	34.12	66.92	65-70%	5038 Contra Costa	16.9	73.9	9.2	49.4	34.7	8.6	1	3	3.3
6031001001	34.11	66.91	65-70%	4176 Kings	14.3	72.2	13.5	34.9	48.8	4.3	0.6	8.7	2.6
6001403100	34.09	66.89	65-70%	2238 Alameda	2.9	91.3	5.8	14.3	18.2	30.3	0.2	33.9	3.1
6029005004	34.09	66.88	65-70%	7219 Kern	18.9	72.8	8.3	78.6	8.1	0.6	0.2	11	1.5
6029003124	34.08	66.87	65-70%	5414 Kern	15.6	78	6.4	46.3	36.3	5.9	0.4	8.8	2.4
6059088601	34.08	66.86	65-70%	6305 Orange	12.4	75.4	12.2	32.5	16.8	1.1	0.3	48.1	1.2
6095251600	34.07	66.84	65-70%	2359 Solano	14.5	77.9	7.6	28.3	29.6	24.4	0.5	10.4	6.7
6037212420	34.06	66.83	65-70%	3228 Los Angeles	11.8	80.5	7.7	55.5	5.4	4.1	0	33.7	1.3
6053001802	34.05	66.82	65-70%	5078 Monterey	16.9	78.5	4.6	68.4	17.9	3	0.3	8.1	2.4
6075061000	34.05	66.81	65-70%	3610 San Francisco	10.6	78.6	10.8	16.5	10.9	13.1	0.5	55.1	3.9
6099000905	34.05	66.79	65-70%	6102 Stanislaus	13.5	70.7	15.8	21.3	66	3	0.6	5.4	3.7
6099002801	34.03	66.78	65-70%	5624 Stanislaus	16.3	75.2	8.5	37.1	57.9	0.9	0.6	1.3	2.3
6037183810	34.03	66.77	65-70%	4369 Los Angeles	17	77.7	5.3	87.5	6.3	1.2	0.1	3.6	1.2
6037701702	34.03	66.75	65-70%	3106 Los Angeles	6.5	82.2	11.3	19.3	59	7.8	0.2	9.1	4.6
6001400900	34.02	66.74	65-70%	2302 Alameda	10.8	79.7	9.5	13.3	31	43.7	0.3	5.8	6
6073013104	34.00	66.73	65-70%	5893 San Diego	15.9	75.2	8.9	73.2	12.6	6.2	0.3	5.3	2.5
6059075514	34.00	66.72	65-70%	3703 Orange	17.1	76.6	6.3	66.3	15.9	2.3	0.1	13.8	1.6
6037265201	34.00	66.70	65-70%	2608 Los Angeles	6.7	76.2	17.1	4.9	76.1	0.8	0	13.3	4.9
6037551402	33.98	66.69	65-70%	4468 Los Angeles	13	76.3	10.7	67.6	20.3	2.4	0.2	8.3	1.1
6085503210	33.97	66.68	65-70%	4453 Santa Clara	16.3	76.6	7.1	46.6	4.7	2.2	0.1	44.7	1.7
6115040901	33.96	66.67	65-70%	2783 Yuba	12.5	73.8	13.7	17.1	65.1	0.7	2.1	10.6	4.3
6007003300	33.96	66.65	65-70%	4852 Butte	11.3	71.3	17.4	16.2	71	1.2	4.4	2.8	4.4
6065043812	33.95	66.64	65-70%	5409 Riverside	0.2	17.3	82.5	6.3	88.2	2.1	0.2	2.7	0.5
6073018200	33.95	66.63	65-70%	6847 San Diego	16.5	76.7	6.8	55.8	36.7	2.6	0.5	2.2	2.2
6037134903	33.94	66.62	65-70%	4216 Los Angeles	11.9	84.8	3.3	39.2	30.5	8.4	0.2	18	3.7
6037600601	33.93	66.60	65-70%	2461 Los Angeles	9.7	70	20.3	7.3	1.2	88.6	0.2	0.6	2.1
6059021821	33.93	66.59	65-70%	6582 Orange	14.7	79	6.3	29	42	2.6	0.4	23.2	2.8
6067008910	33.93	66.58	65-70%	3486 Sacramento	12.3	73.4	14.3	17.8	60.3	9.8	1.1	4.9	6.1
6073003401	33.92	66.57	65-70%	6065 San Diego	14.1	72.9	13	39.7	17.7	24.9	0.3	14.5	2.9
6037920106	33.92	66.55	65-70%	3110 Los Angeles	15.2	79.1	5.7	54.8	36.7	3.5	0.3	2	2.9
6073011802	33.89	66.54	65-70%	6741 San Diego	19.8	73.6	6.6	76.8	4.5	4.5	0.1	12.8	1.3
6037107010	33.89	66.53	65-70%	3247 Los Angeles	14.7	77.2	8.1	91.5	6.1	0.4	0.1	1.6	0.2
6059087106	33.88	66.52	65-70%	5097 Orange	15.3	71.3	13.4	66.5	18.9	1.5	0.4	11.5	1.2
6067009110	33.86	66.50	65-70%	1482 Sacramento	18.5	76.2	5.3	24.2	27.6	34.4	0.7	7.2	5.8
6037600801	33.86	66.49	65-70%	3245 Los Angeles	10.7	71.9	17.4	10.9	1.2	84.4	0.1	0.9	2.6
6013307201	33.85	66.48	65-70%	3467 Contra Costa	19.7	70.6	9.7	46	31.4	13.6	0.3	5.5	3.2
6059099903	33.84	66.46	65-70%	5749 Orange	13.3	77	9.7	43.7	19.2	0.5	0.2	34.7	1.7
6029000102	33.83	66.45	65-70%	3055 Kern	15.3	69.6	15.1	11.7	82.6	0	1.6	0.4	3.8
6037187300	33.82	66.44	65-70%	3216 Los Angeles	10	80	10	23.4	51	2.8	0.2	18.8	3.9
6077005125	33.82	66.43	65-70%	1859 San Joaquin	12.7	75.5	11.8	37.4	53.3	3.2	0.3	3.4	2.4
6037554700	33.81	66.41	65-70%	4874 Los Angeles	15.3	75.3	9.4	80.9	4.1	1.8	0.2	11.6	1.5
6085505100	33.80	66.40	65-70%	3027 Santa Clara	11.8	78.6	9.6	32.3	27.8	3.3	0.2	32.8	3.5
6071002306	33.79	66.39	65-70%	4169 San Bernardino	14.5	79.5	6	66.8	11.4	15.1	0.5	4.4	1.8
6037212306	33.79	66.38	65-70%	3052 Los Angeles	12.3	80.8	6.9	48.5	3.9	1.4	0	45.4	0.8
6059075100	33.78	66.36	65-70%	9983 Orange	14.2	79.8	6	74.9	16.9	2.3	0.1	5	0.9
6001427600	33.77	66.35	65-70%	4722 Alameda	13.7	78.7	7.6	13.6	23.1	15.7	0.4	40.6	6.6
6037115301	33.77	66.34	65-70%	4156 Los Angeles	8	71	21	17.5	55.6	4.4	0.2	18.8	3.4
6059042312	33.77	66.33	65-70%	9085 Orange	18.5	72.7	8.8	73.2	23.2	0.4	0.8	1.7	0.7
6115040301	33.76	66.31	65-70%	3366 Yuba	20.5	72.2	7.3	28	47.9	3.4	1.6	13.5	5.6
6001427300	33.76	66.30	65-70%	4896 Alameda	9.6	73.1	17.3	10.5	42.3	7.9	0.4	33.1	5.7
6037301501	33.75	66.29	65-70%	1902 Los Angeles	7.7	76.4	15.9	8.4	79.4	0.4	0	8.4	3.4
6099000102	33.75	66.28	65-70%	3869 Stanislaus	10.9	72.5	16.6	18.5	76.2	0.1	1.2	1.8	2.3
6019005805	33.75	66.26	65-70%	3798 Fresno	19.4	73.5	7.1	25.2	42.8	1.9	0.8	25.6	3.7
6067001200	33.75	66.25	65-70%	3323 Sacramento	2.3	87.3	10.4	16.2	63	8.4	0.8	7.5	4.1
6037701902	33.74	66.24	65-70%	4016 Los Angeles	2.6	80.6	16.8	10.1	68.5	6.7	0.3	10.4	4
6013302006	33.72	66.23	65-70%	3779 Contra Costa	14.2	80.9	4.9	31.8	51.8	7	0.6	4.7	4.1
6073013206	33.71	66.21	65-70%	6544 San Diego	14.2	67.6	18.2	78.7	13.7	2.3	0.1	4.1	1.1
6025011700	33.70	66.20	65-70%	4797 Imperial	13.6	76	10.4	81.3	15.1	1.8	0.1	1.1	0.5
6013367200	33.69	66.19	65-70%	5171 Contra Costa	14.3	77.8	7.9	45.6	9.9	15.9	0.2	25.7	2.7
6067003000	33.69	66.17	65-70%	6563 Sacramento	13.2	74.8	12	36.5	45	6.6	0.6	7	4.4
6037408135	33.67	66.16	65-70%	4159 Los Angeles	12.3	77.2	10.5	35.3	5.7	4.5	0.4	52.1	2.1
6037700101	33.66	66.15	65-70%	5232 Los Angeles	3.2	76.3	20.5	11.9	77.8	3.2	0.2	4.4	2.5
6065043216	33.66	66.14	65-70%	6495 Riverside	14.5	79.1	6.4	31.4	51	4.8	0.8	8.3	3.7
6095251100	33.65	66.12	65-70%	3271 Solano	15.4	77.1	7.5	41.9	24	19	0.5	9.5	5.1
6071012104	33.64	66.11	65-70%	5110 San Bernardino	11.4	73.4	15.2	25.4	65.4	3.6	1.7	1.9	2.1
6037201110	33.63	66.10	65-70%	2574 Los Angeles	12.6	76.9	10.5	81.3	7.1	1.3	0.3	9.6	0.4
6037482101	33.62	66.09	65-70%	4568 Los Angeles	10	71.8	18.2	25	4.1	0.3	0.2	69.1	1.3
6101050101	33.62	66.07	65-70%	6438 Sutter	17.1	71.4	11.5	28.4	51.4	4.1	0.9	10.5	4.6
6001437102	33.60	66.06	65-70%	4251 Alameda	12.4	74.9	12.7	31.8	12.7	9.8	0.4	40.9	4.4
6111007611	33.60	66.05	65-70%	4375 Ventura	18.7	76	5.3	83.2	13.3	0.7	0.2	1.8	0.8
6037482521	33.60	66.04	65-70%	5754 Los Angeles	10.7	73.8	15.5	44.2	5.4	1.4	0.3	47.6	1.1
6013373000	33.60	66.02	65-70%	4376 Contra Costa	18.1	74.1	7.8	76.8	5	10.6	0.2	6.1	1.3
6073020018	33.58	66.01	65-70%	7708 San Diego	18	76.4	5.6	70.1	22.6	1.8	0.2	3.9	1.4
6019004902	33.56	66.00	65-70%	1985 Fresno	15.5	73	11.5	46.5	44.7	2.5	0.5	3.2	2.6
6037406901	33.56	65.99	65-70%	4701 Los Angeles	15.5	72.9	11.6	80.7	5.9	3.4	0.1	9.2	0.7
6099000806	33.55	65.97	65-70%	4231 Stanislaus	12.2	73.6	14.2	29.7	54.1	3.9	0.6	7.9	3.8
6019004601	33.55	65.96	65-70%	2641 Fresno	10.3	66.2	23.5	30.5	60.9	3.1	0.3	3.1	2.2
6073010109	33.53	65.95	65-70%	4595 San Diego	14.3	77.3	8.4	71.2	8.5	3.7	0.1	13.9	2.7
6037405301	33.53	65.94	65-70%	3349 Los Angeles	14.9	74.6	10.5	68.4	14.2	5	0.3	10.5	1.6
6059075812	33.52	65.92	65-70%	6573 Orange	17.2	73.3	9.5	52.9	39	0.9	0.2	5.4	1.5
6071000808	33.52	65.91	65-70%	5840 San Bernardino	11.3	75.9	12.8	38.1	47.7	4.7	0.4	6.8	2.3

6037670003	33.51	65.90	65-70%	5788 Los Angeles	11.1	77.3	11.6	32.1	47.8	2.7	0.5	13	3.9
6037211921	33.50	65.88	65-70%	2474 Los Angeles	11.7	82	6.3	44.2	4.6	4.2	0	45.6	1.2
6037236000	33.48	65.87	65-70%	4113 Los Angeles	7.4	68.5	24.1	8.5	17.4	63.1	0.1	6.5	4.4
6001437300	33.48	65.86	65-70%	3111 Alameda	13.6	75.8	10.6	35.4	16.5	13.4	0.5	28.8	5.4
6001436300	33.48	65.85	65-70%	7129 Alameda	17.5	76.1	6.4	56.3	13.2	12.7	0.3	14.3	3.3
6037271200	33.47	65.83	65-70%	2525 Los Angeles	6.6	86	7.4	33	33.1	3.8	0.2	26.9	3
6115040200	33.45	65.82	65-70%	7767 Yuba	16.3	70.6	13.1	23.4	63.4	3.6	1.3	3.5	4.8
6037910402	33.45	65.81	65-70%	3751 Los Angeles	22.3	72.8	4.9	70.9	9.7	16.4	0.2	0.9	1.8
6067006002	33.44	65.80	65-70%	4624 Sacramento	14	73.1	12.9	16.4	64.6	7.8	0.8	6.1	4.3
6001405302	33.44	65.78	65-70%	2530 Alameda	6.5	76	17.5	14.6	23.4	19.3	0.4	38	4.3
6075026402	33.44	65.77	65-70%	4118 San Francisco	10.4	77.2	12.4	21.2	9	10.1	0.1	56.8	2.7
6037201401	33.44	65.76	65-70%	4803 Los Angeles	15.5	75.5	9	82.1	3.6	2.9	0.1	10.6	0.7
6029001101	33.43	65.75	65-70%	4413 Kern	19.6	73.1	7.3	68.2	25.1	3.4	0.9	0.7	1.7
6073016301	33.43	65.73	65-70%	4919 San Diego	16.3	77.3	6.4	36.6	43.9	9.9	0.6	4.5	4.5
6037183520	33.43	65.72	65-70%	3881 Los Angeles	15.6	77.5	6.9	85.4	8.8	1.3	0.2	3.6	0.8
6059088801	33.42	65.71	65-70%	8343 Orange	13.9	78.5	7.6	28.1	12.3	1.5	0.3	56.3	1.6
6111004901	33.42	65.70	65-70%	6249 Ventura	17.4	79.1	3.5	57.2	16.6	4.4	0.3	19.1	2.4
6001436500	33.42	65.68	65-70%	4583 Alameda	14.4	80.2	5.4	36.4	18.6	17.3	0.5	22.4	4.8
6073013308	33.42	65.67	65-70%	3731 San Diego	15.9	77.1	7	82	9.4	3.5	0.1	3.6	1.4
6073013306	33.40	65.66	65-70%	4773 San Diego	13.4	75.3	11.3	68.7	17.7	3.6	0.4	7.7	2.1
6073013204	33.40	65.65	65-70%	4014 San Diego	14	75	11	86.9	7.3	1.5	0.1	3.1	1.1
6037543701	33.40	65.63	65-70%	2994 Los Angeles	11.8	77	11.2	50	7.5	1.6	0.1	39.2	1.6
6077003210	33.40	65.62	65-70%	2800 San Joaquin	10.6	65.4	24	24.5	48	9.3	0.2	13.9	4.1
6059074805	33.39	65.61	65-70%	5962 Orange	22.7	74.6	2.7	95.1	1.4	1.3	0	1.9	0.3
6037550700	33.39	65.59	65-70%	6921 Los Angeles	13.3	74.6	12.1	69.3	20.8	1.5	0.2	7.1	1.2
6065040404	33.39	65.58	65-70%	3309 Riverside	16	75.6	8.4	55	30.9	3.7	0.3	8.3	1.9
6001410100	33.38	65.57	65-70%	2406 Alameda	13.5	75.9	10.6	17.7	9.7	61.6	0.6	6.5	3.9
6071000503	33.38	65.56	65-70%	5270 San Bernardino	15.5	79.1	5.4	57.2	22.4	5.7	0.3	12.2	2
6007001100	33.38	65.54	65-70%	4572 Butte	4.6	87.5	7.9	15.3	74	2.6	0.6	3.8	3.7
6111008700	33.37	65.53	65-70%	6424 Ventura	16.7	74.3	9	79.4	14.7	2.1	0.3	1.8	1.7
6065040615	33.36	65.52	65-70%	9024 Riverside	18	77.4	4.6	40.3	22.9	10	0.2	23.5	3.2
6037900602	33.36	65.51	65-70%	5214 Los Angeles	20.1	72.7	7.2	57.3	22.9	15.3	0.3	1.2	3
6067003600	33.36	65.49	65-70%	2826 Sacramento	14.8	76.2	9	51	26.4	8.2	1	10.8	2.6
6081602400	33.35	65.48	65-70%	6679 San Mateo	10.4	69.1	20.5	24.8	39.7	1.9	0.1	29.5	4
6037577602	33.35	65.47	65-70%	3441 Los Angeles	5.7	69.4	24.9	11.7	72.6	3.1	0.5	9.5	2.7
6037650101	33.33	65.46	65-70%	5831 Los Angeles	10.9	69.3	19.8	17.3	24	2.1	0.2	51	5.4
6013378000	33.33	65.44	65-70%	3435 Contra Costa	7.7	72.5	19.8	14.4	67.5	7.3	0.3	7.7	2.8
6059074111	33.32	65.43	65-70%	5568 Orange	13.6	76.3	10.1	66.3	13.8	1.7	0.1	16.7	1.4
6095251200	33.32	65.42	65-70%	3061 Solano	14.6	75.9	9.5	37.7	23.1	23.3	0.5	10.9	4.5
6037216200	33.31	65.41	65-70%	4911 Los Angeles	7.6	82.3	10.1	15.1	38.8	24.7	0.3	17.1	4.1
6037275500	33.30	65.39	65-70%	5207 Los Angeles	14.9	75.4	9.7	71	13	6.2	0.2	8.1	1.5
6037125600	33.28	65.38	65-70%	2657 Los Angeles	8.8	75.4	15.8	13.7	71.5	4.3	0.2	6.4	4
6065041909	33.28	65.37	65-70%	4990 Riverside	13	76.9	10.1	52.4	42.2	1.7	0.3	2	1.4
6037297202	33.27	65.36	65-70%	3423 Los Angeles	13.6	73.2	13.2	37.6	50.3	3.7	0.3	4.2	3.9
6065042403	33.27	65.34	65-70%	4071 Riverside	13.7	76.3	10	49	28.4	14.1	0.5	5.7	2.2
6059001506	33.27	65.33	65-70%	4109 Orange	9.3	72	18.7	19.3	60	0.7	0.2	17	2.7
6067004202	33.26	65.32	65-70%	5538 Sacramento	15.7	70.8	13.5	37.1	11.3	23.1	0.5	24	4
6037500800	33.26	65.30	65-70%	5470 Los Angeles	13.7	75	11.3	91.7	5.7	0.4	0.2	1.5	0.5
6065042401	33.24	65.29	65-70%	2082 Riverside	8.7	80.3	11	37.5	46.7	8.3	0.3	4.6	2.6
6037211500	33.23	65.28	65-70%	4355 Los Angeles	11.5	76.8	11.7	21.8	36.1	3.7	0.1	36	2.2
6077004001	33.21	65.27	65-70%	2508 San Joaquin	14.4	70.5	15.1	53	39.4	2	0.3	3.7	1.6
6059099803	33.20	65.25	65-70%	5762 Orange	13	70.9	16.1	20.5	12.7	0.6	0.1	65	1
6065040808	33.20	65.24	65-70%	7008 Riverside	16.8	72.9	10.3	57	27.7	6	0.3	7.1	1.9
6037482202	33.19	65.23	65-70%	5229 Los Angeles	10.4	76.6	13	17.7	2.8	0.3	0	78.6	0.6
6083002402	33.17	65.22	65-70%	11406 Santa Barbara	20.6	73.2	6.2	74	17.4	1.4	0.2	5.5	1.6
6099000403	33.16	65.20	65-70%	4317 Stanislaus	9.9	71.5	18.6	21.8	68.4	2.1	0.5	4.1	3.1
6059075811	33.16	65.19	65-70%	3332 Orange	16.4	75.2	8.4	57.6	33.9	0.8	0.2	5.9	1.6
6111000200	33.16	65.18	65-70%	2822 Ventura	18.4	75	6.6	85.8	11.5	0.8	0.2	0.5	1.2
6071009910	33.14	65.17	65-70%	4653 San Bernardino	14.5	75.5	10	47.5	34	11.4	0.3	3.8	3
6037431001	33.13	65.15	65-70%	7171 Los Angeles	12.7	79.2	8.1	44.2	38.4	6.2	0.4	8.1	2.8
6071001901	33.12	65.14	65-70%	5753 San Bernardino	13.5	80.3	6.2	48.4	31.5	5.1	0.1	12.6	2.2
6045011600	33.11	65.13	65-70%	5802 Mendocino	16.8	70.1	13.1	40.2	49.6	1.2	2.8	2.9	3.3
6001438204	33.11	65.12	65-70%	5368 Alameda	11.2	71	17.8	29	23.4	8.7	0.1	33.7	5
6095251902	33.11	65.10	65-70%	5833 Solano	14.4	74.5	11.1	34.7	8.9	24.8	0.2	27.4	4
6081604101	33.10	65.09	65-70%	7993 San Mateo	14.3	77.6	8.1	51.6	21.3	2	0.2	20.4	4.5
6037703200	33.09	65.08	65-70%	5629 Los Angeles	9.1	69.4	21.5	6.4	3.5	84.2	0.2	1.5	4.2
6037207710	33.08	65.06	65-70%	2490 Los Angeles	3.1	78.2	18.7	15.5	35	11.7	0.2	34.7	2.9
6037462201	33.06	65.05	65-70%	3788 Los Angeles	9.6	66.1	24.3	39.6	31.2	10.6	0.3	15.8	2.5
6037102107	33.06	65.04	65-70%	3851 Los Angeles	8.9	70.9	20.2	27	60	2.6	0.4	7.6	2.4
6037109603	33.04	65.03	65-70%	4252 Los Angeles	12.9	76.5	10.6	64.9	17.9	4.5	0.3	10.8	1.6
6059074702	33.02	65.01	65-70%	6316 Orange	17.9	76.9	5.2	96.5	2.3	0.2	0	0.8	0.1
6065043503	33.01	65.00	65-70%	4112 Riverside	12	54	34	26.5	58.7	7.9	0.9	3.3	2.8
6107000702	33.01	64.99	60-65%	5391 Tulare	20.5	72	7.5	87.6	10.3	0.2	0.6	0.7	0.7
6029005201	33.01	64.98	60-65%	5397 Kern	7	61.6	31.4	7.4	86	0.2	1.8	0.5	4.1
6065043008	33.00	64.96	60-65%	5394 Riverside	16.2	76.6	7.2	44.6	44.6	4.2	0.3	4	2.3
6001435104	33.00	64.95	60-65%	5216 Alameda	14.8	79.7	5.5	35.9	16.8	19	0.3	23.5	4.6
6059076101	33.00	64.94	60-65%	8933 Orange	11.8	82.6	5.6	46.1	32.7	2.4	0.2	15.8	2.8
6053010400	33.00	64.93	60-65%	6481 Monterey	19.1	74.5	6.4	90.1	5.8	0.7	0.1	2.2	1
6107001006	33.00	64.91	60-65%	5765 Tulare	11.6	73.4	15	32.1	60.1	1.9	0.7	3.5	1.7
6055200203	32.99	64.90	60-65%	2497 Napa	16.1	76.5	7.4	57.4	38.9	0.2	0.5	1.1	1.9
6037600911	32.99	64.89	60-65%	3349 Los Angeles	13.9	78.2	7.9	53.8	7.6	34	0.2	1.7	2.6
6013371000	32.99	64.88	60-65%	5316 Contra Costa	13.2	76.6	10.2	42.3	23.7	14.2	0.2	15.2	4.4
6059088502	32.99	64.86	60-65%	5249 Orange	13.8	72.7	13.5	53.6	15.1	1.1	0.3	28.4	1.4
6077004203	32.98	64.85	60-65%	3883 San Joaquin	16.9	69.1	14	38.5	54.8	0.5	0.5	3.7	2.1
6037269602	32.98	64.84	60-65%	3252 Los Angeles	15.1	79.6	5.3	53.5	24	15.1	0.1	4.9	2.3
6037103200	32.97	64.83	60-65%	6150 Los Angeles	9.4	75.9	14.7	29	56.3	4.2	0.4	7.4	2.6
6071002036	32.96	64.81	60-65%	11640 San Bernardino	15.8	78.9	5.3	33.4	33.4	14.5	0.3	14.5	3.8
6037212102	32.94	64.80	60-65%	2446 Los Angeles	9	71.3	19.7	29.1	13.2	8.3	0.1	46.3	2.9
6001407102	32.93	64.79	60-65%	4351 Alameda	15.2	76.5	8.3	48.2	8.6	20.9	0.6	20	1.7
6037201120	32.93	64.77	60-65%	4097 Los Angeles	14.1	77.9	8	82.1	5.5	1.9	0.1	9.5	0.8
6037481300	32.92	64.76	60-65%	3153 Los Angeles	10.5	75.3	14.2	31	5.1	0.2	0.3	62.8	0.7
6001442800	32.92	64.75	60-65%	2816 Alameda	11.8	75.5	12.7	23.8	35.7	2.9	0.1	33.4	4.1
6071008404	32.91	64.74	60-65%	2729 San Bernardino	15.7	78.5	5.8	43.6	39.5	8.8	0.4	4.7	3
6037320100	32.91	64.72	60-65%	7144 Los Angeles	16.8	76.5	6.7	90.3	7.2	0.9	0.2	1	0.3
6077003111	32.90	64.71	60-65%	3754 San Joaquin	12.1	72.9	15	26.4	34.8	18.8	0.6	15.1	4.4
6037134901	32.90	64.70	60-65%	3069 Los Angeles	11	73.8	15.2	25.3	58.6	4.3	0.2	7.6	4
6037920312	32.89	64.69	60-65%	5268 Los Angeles	11.7	73.4	14.9	28.2	60.9	2.9	0.2	4.9	3
6031001200	32.89	64.67	60-65%	2507 Kings	15.8	71.2	13	44.8	52.7	0.6	0.6	0.4	0.9
6037203800	32.88	64.66	60-65%	4589 Los Angeles	16.7	75	8.3	96.6	1.6	0.6	0.1	0.8	0.3
6037650200	32.87	64.65	60-65%	5783 Los Angeles	10.8	76.1	13.1	24.8	41.3	2.8	0.2	25.5	5.4
6069000502	32.86	64.64	60-65%	6099 San Benito	18.1	76	5.9	76.5	19.7	0.3	0.3	1.7	1.5
6085501200	32.86	64.62	60-65%	4186 Santa Clara	12.8	78.2	9	62.6	20.9	2.2	0.5	11.2	2.7
6077003215	32.86	64.61	60-65%	3855 San Joaquin	14.9	76.8	8.3	28.1	35.6	15.7	0.3	15.9	4.4
6019004503	32.85	64.60	60-65%	4723 Fresno	9.5	70.2	20.3	23.6	63.5	3.4	0.3	5.9	3.2
6073010103	32.85	64.59	60-65%	5569 San Diego	15	76	9	75.3	15	3	0.2	4.5	1.9
6073016502	32.83	64.57	60-65%	6915 San Diego	14.5	76.2	9.3	28.7	57	5.1	0.4	3.2	5.5
6019005302	32.82	64.56	60-65%	5208 Fresno	14.3	75.8	9.9	40.7	34	9.9	1	11.9	2.6
6037134304	32.82	64.55	60-65%	2882 Los Angeles	11.7	68.8	19.5	28.3	46	4.1	0.2	18.6	2.7
6101050702	32.81	64.54	60-65%	6205 Sutter	15.8	72.9	11.3	44	39.4	1.6	0.7	11.1	3.1
6065041301	32.80	64.52	60-65%	3473 Riverside	17.5	75.9	6.6	77.7	16.7	1.9	0.4	2.5	0.8
6061020901	32.79	64.51	60-65%	2605 Placer	17.5	73	9.5	40.9	51.4	1.7	1	1.5	3.5
6037117302	32.79	64.50	60-65%	4914 Los Angeles	10.4	72.9	16.7	27.2	50	4.5	0.1	15.2	3
6029003122	32.79	64.48	60-65%	8845 Kern	20	75.5	4.5	73.3	13.9	8.5	0.4	2.5	1.4
6075017802	32.78	64.47	60-65%	4516 San Francisco	4.5	88.3	7.2	14.3	47.2	10.6	0.6	23.6	3.8
6065041906	32.77	64.46	60-65%	6360 Riverside	17.6	73.7	8.7	66.4	26.8	3.1	0.3	2.2	1.2
6111004503	32.76	64.45	60-65%	4387 Ventura	19.2	76.7	4.1	79.1	5.6	2	0.1	11.7	1.5
6029005900	32.75	64.43	60-65%	3589 Kern	18.6	71.8	9.6	39.1	40.3	16.5	0.6	1.1	2.4
6059074408	32.75	64.42	60-65%	5399 Orange	19.2	76.2	4.6	78	11.6	2.7	0.3	6.4	1.1
6107002203	32.74	64.41	60-65%	4363 Tulare	21.1	73.6	5.3	70.9	21.7	3.1	0.4	2.5	1.3
6047000602	32.73	64.40	60-65%	3550 Merced	15.1	72.1	12.8	48	41.4	3.4	0.4	4	2.8
6007002500	32.72	64.38	60-65%	4930 Butte	17	75.6	7.4	14.2	63	3.3	2.5	12.9	4.2
6037131600	32.71	64.37	60-65%	5494 Los Angeles	12	78.8	9.2	54.5	28.9	2.5	0.2	11.9	2.1
6037124903	32.71	64.36	60-65%	3262 Los Angeles	7.3	81.2	11.5	20.5	64.3	6.3	0.3	4.6	4.1

6059001901	32.71	64.35	60-65%	2810 Orange	12.8	77.2	10	50.4	33.4	1.3	0.4	12.4	2.1
6073012102	32.70	64.33	60-65%	3279 San Diego	15.4	74.8	9.8	75.6	11.2	2.4	0.4	9.1	1.4
6095252605	32.69	64.32	60-65%	5520 Solano	17	75	8	46	22.4	16	0.3	9.3	5.9
6065046101	32.69	64.31	60-65%	3060 Riverside	17.1	72.2	10.7	50.5	39	5.7	0.6	2.9	1.3
6029005802	32.69	64.30	60-65%	7379 Kern	17.1	74.3	8.6	40.6	42.2	9.2	0.9	3.2	3.9
6085503402	32.67	64.28	60-65%	5263 Santa Clara	18.6	74.7	6.7	69.1	2.7	3.6	0.1	22.9	1.5
6065043900	32.64	64.27	60-65%	6405 Riverside	17.8	73.5	8.7	51.1	41.1	2.5	1	1.8	2.5
6037430901	32.64	64.26	60-65%	4324 Los Angeles	14	77.3	8.7	49.1	27.2	7.8	0.2	12.5	3.3
6025010600	32.63	64.25	60-65%	6998 Imperial	16.7	71.8	11.5	65.3	30	1.1	0.4	2.3	0.9
6077003213	32.63	64.23	60-65%	4571 San Joaquin	14.2	72.4	13.4	27.2	27.9	17.4	0.4	23.1	3.9
6069000701	32.62	64.22	60-65%	3644 San Benito	20.9	74.6	4.5	78.5	17.2	0.7	0.2	2.1	1.4
6037703100	32.61	64.21	60-65%	5446 Los Angeles	9.1	69.8	21.1	6.6	4.9	82.1	0.1	1.2	5.2
6085503306	32.60	64.19	60-65%	4311 Santa Clara	15.2	75.5	9.3	62.2	3.7	1.5	0.2	31.2	1.1
6037125100	32.60	64.18	60-65%	5431 Los Angeles	9.3	81.9	8.8	19.4	64.4	6.8	0.2	5.7	3.5
6095251000	32.59	64.17	60-65%	2470 Solano	12.8	79.8	7.4	27	39.5	21.9	0.6	5.9	5
6065042407	32.59	64.16	60-65%	3262 Riverside	14.9	78.1	7	50.7	31.3	10.8	0.9	3.5	2.9
6065045900	32.58	64.14	60-65%	1838 Riverside	17	72.9	10.1	57.7	32.4	7.6	0.9	0.5	0.9
6059087601	32.57	64.13	60-65%	4808 Orange	14.2	75.4	10.4	52.4	25.8	3	0.1	16.9	1.9
6037604002	32.57	64.12	60-65%	5078 Los Angeles	14.8	79.9	5.3	58.4	21.3	7.5	0.2	9.5	3.1
6071010700	32.57	64.11	60-65%	3798 San Bernardino	16.3	70.2	13.5	22.4	68.9	2.1	2.7	0.9	3.1
6099000912	32.56	64.09	60-65%	17129 Stanislaus	15.9	76.3	7.8	26	49.8	3.9	0.4	15.4	4.4
6099002603	32.56	64.08	60-65%	2906 Stanislaus	13.7	70.8	15.5	36.5	55.8	1.4	1.4	2.3	2.6
6037113233	32.55	64.07	60-65%	6655 Los Angeles	15.1	75.9	9	54.4	24.2	6.9	0.2	12	2.4
6065041403	32.55	64.06	60-65%	2763 Riverside	11.6	74.1	14.3	48.1	41.6	4.7	0.2	3.9	1.5
6037460900	32.53	64.04	60-65%	6998 Los Angeles	13.7	77	9.3	55.9	8.6	27.6	0.1	5.2	2.6
6037106405	32.53	64.03	60-65%	3966 Los Angeles	16.3	78.3	5.4	79.8	10.1	5.9	0.3	3.3	0.7
6059088903	32.52	64.02	60-65%	8585 Orange	13.2	75.8	11	27	8.7	0.3	0.2	62.5	1.4
6037551501	32.52	64.01	60-65%	4869 Los Angeles	13	77.3	9.7	65.6	21.2	4.6	0.1	7.2	1.2
6037603006	32.50	63.99	60-65%	2035 Los Angeles	10.5	68.5	21	30.7	9.5	10.3	0.1	46.5	2.9
6037480901	32.50	63.98	60-65%	4686 Los Angeles	11	80.1	8.9	36.1	3.9	1.5	0.1	56.7	1.7
6067003202	32.49	63.97	60-65%	5052 Sacramento	14.9	72.6	12.5	38.6	23.7	5.5	0.5	29.3	2.4
6037543703	32.49	63.96	60-65%	3472 Los Angeles	11.5	76.6	11.9	57.7	10.1	5	0.1	24.6	2.5
6065046900	32.49	63.94	60-65%	2043 Riverside	14.7	70.9	14.4	52.3	42.7	1.7	0.6	0.7	2.1
6029004902	32.49	63.93	60-65%	8349 Kern	16.5	75	8.5	68.7	4.1	0.5	0.3	25.2	1.2
6065043822	32.48	63.92	60-65%	2689 Riverside	16.2	75.5	8.3	37	52.8	2.9	0.5	4.8	2
6059074103	32.47	63.90	60-65%	5026 Orange	16.2	77.8	6	91.8	4.2	0.4	0.4	2.8	0.4
6077005406	32.46	63.89	60-65%	3262 San Joaquin	18.6	74.4	7	55.5	22.8	7.2	0.5	9.5	4.4
6001409600	32.46	63.88	60-65%	5063 Alameda	18.3	75.2	6.5	58.8	1.9	33.2	0.1	4	2
6107001301	32.45	63.87	60-65%	8013 Tulare	15.8	75.9	8.3	48.9	41.9	1.6	0.8	4.8	2
6065043307	32.45	63.85	60-65%	5872 Riverside	13.1	61.1	25.8	33.4	55	5.3	0.7	2.9	2.6
6103000700	32.44	63.84	60-65%	7828 Tehama	17.8	68.3	13.9	24.5	67.8	0.7	2	1.7	3.3
6081610302	32.43	63.83	60-65%	2108 San Mateo	10.1	80	9.9	40.3	43.5	2.7	0.5	9.7	3.3
6071002607	32.43	63.82	60-65%	7826 San Bernardino	16.2	79.3	4.5	64.5	9.1	14.6	0.3	9.6	1.9
6067009319	32.41	63.80	60-65%	4864 Sacramento	15.8	76.3	7.9	22.7	16.6	12.6	0.3	42.7	5
6075026404	32.41	63.79	60-65%	2851 San Francisco	12.7	77.3	10	29.1	1.9	18.1	0	47	3.8
6059074407	32.39	63.78	60-65%	6700 Orange	22.6	73.5	3.9	87.5	6.8	1.3	0.1	3.5	0.7
6065040609	32.38	63.77	60-65%	8422 Riverside	20.1	75.4	4.5	37.5	21.1	7.3	0.2	30.7	3.1
6037293306	32.37	63.75	60-65%	2189 Los Angeles	13.1	73.4	13.5	37.7	45	5	0.5	9.1	2.7
6037211802	32.37	63.74	60-65%	4192 Los Angeles	9.8	82.3	7.9	35.6	9.9	6.5	0.1	45.4	2.4
6065043308	32.35	63.73	60-65%	2770 Riverside	18.3	73.7	8	47.2	39.2	8.6	1.2	1.4	2.3
6099003909	32.35	63.72	60-65%	5980 Stanislaus	11.8	74.8	13.4	28.3	62.8	1.5	0.6	3.2	3.7
6037269905	32.33	63.70	60-65%	2423 Los Angeles	6.6	88.8	4.6	31	32.1	11.3	0.6	20.3	4.6
6053000800	32.33	63.69	60-65%	5628 Monterey	20.2	74.8	5	95	3.8	0.2	0	0.8	0.3
6067009004	32.32	63.68	60-65%	3878 Sacramento	15.2	75.3	9.5	19.9	50.7	13.9	0.5	8.8	6.2
6075017700	32.31	63.67	60-65%	2128 San Francisco	6.5	87.5	6	34	42.7	4.7	0.4	14.5	3.7
6085501402	32.31	63.65	60-65%	2947 Santa Clara	14.2	77.7	8.1	68.8	17.3	1.6	0.1	11	1.1
6065042723	32.30	63.64	60-65%	5506 Riverside	14.4	67	18.6	47.5	47.4	1.7	0.7	1.1	1.6
6093000900	32.30	63.63	60-65%	7231 Siskiyou	11.6	70.8	17.6	11.1	76.5	3.7	1.7	3.2	3.8
6037199110	32.29	63.61	60-65%	2710 Los Angeles	14.8	75.2	10	88	4.3	1.1	0.2	5.6	0.8
6059087602	32.29	63.60	60-65%	7722 Orange	15	73.9	11.1	50.1	26.5	1.6	0.2	20.1	1.4
6037195300	32.27	63.59	60-65%	3203 Los Angeles	6.7	83.1	10.2	30.4	51.1	1.7	0.2	13.8	2.8
6001436800	32.26	63.58	60-65%	4027 Alameda	16.2	74.4	9.4	45	15.9	13.6	0.4	21.3	3.8
6037408134	32.24	63.56	60-65%	2743 Los Angeles	8	77.9	14.1	30.7	9	7.5	0	50.4	2.4
6111003900	32.22	63.55	60-65%	7533 Ventura	19.6	74.8	5.6	88.8	5.5	0.8	0.3	4	0.7
6077003205	32.22	63.54	60-65%	3537 San Joaquin	11.1	72.8	16.1	25.9	54.2	5.3	0.6	9.8	4.2
6037311500	32.22	63.53	60-65%	5633 Los Angeles	10.8	77.7	11.5	23.3	61	2.3	0.2	10.2	3
6037401901	32.21	63.51	60-65%	4610 Los Angeles	0.9	98.8	0.3	11.8	63.8	3.6	0.1	13.8	6.8
6075020100	32.21	63.50	60-65%	6172 San Francisco	5.6	83.9	10.5	43	31.4	5.7	1.4	15.2	3.3
6037431400	32.21	63.49	60-65%	3970 Los Angeles	12.8	72.3	14.9	25.6	31.8	1.4	0.3	38.3	2.7
6071003404	32.21	63.48	60-65%	4946 San Bernardino	20.5	74.8	4.7	74.6	11.2	11.3	0.3	1.4	1.1
6001432502	32.21	63.46	60-65%	4485 Alameda	12.6	77.7	9.7	32.2	14	11.8	0.4	38.6	3
6065030700	32.20	63.45	60-65%	5598 Riverside	14.1	76.7	9.2	34.2	54.6	5.9	0.6	1.6	3.1
6037191902	32.19	63.44	60-65%	2867 Los Angeles	9.4	79.9	10.7	13.6	70.4	3.2	0.1	9.8	2.9
6037269907	32.18	63.43	60-65%	2761 Los Angeles	8	87.1	4.9	23.9	37.4	12.1	0.2	21.5	4.9
6031000404	32.17	63.41	60-65%	9791 Kings	17.5	76.3	6.2	36.6	43.9	5.3	0.7	9.6	3.9
6037183300	32.16	63.40	60-65%	3480 Los Angeles	13.7	76.4	9.9	72	8.7	0.5	0.2	17.4	1.3
6037550500	32.16	63.39	60-65%	7809 Los Angeles	12.4	74	13.6	68.1	19.5	1.9	0.1	9.3	1
6037405702	32.16	63.37	60-65%	4854 Los Angeles	13.9	76.6	9.5	61.8	18.8	3.5	0.3	14.1	1.5
6099002901	32.16	63.36	60-65%	4764 Stanislaus	13.1	73.2	13.7	27.9	68.2	0.3	0.9	1.2	1.4
6059011102	32.16	63.35	60-65%	4356 Orange	12.8	77.5	9.7	52.6	29.2	2.1	0.4	14	1.8
6037702400	32.14	63.34	60-65%	4541 Los Angeles	10.6	78.5	10.9	32.1	46.4	4.8	0.2	11.2	5.3
6099003906	32.13	63.32	60-65%	4880 Stanislaus	17.9	71.5	10.6	42	47.9	3.3	0.6	3.1	3.1
6037297601	32.13	63.31	60-65%	2594 Los Angeles	15.8	76.3	7.9	26.9	50.1	11.1	0.5	5.8	5.4
6055200202	32.13	63.30	60-65%	2856 Napa	9.9	81.2	8.9	36.3	57.4	1.4	0.8	1.7	2.4
6071004509	32.13	63.29	60-65%	4764 San Bernardino	14.7	76.4	8.9	43.1	38.9	11	0.3	3.9	2.7
6073005800	32.12	63.27	60-65%	2725 San Diego	4	91.3	4.7	17.3	70.6	3.2	0.2	6.1	2.6
6077005134	32.11	63.26	60-65%	4743 San Joaquin	12.5	77.9	9.6	32	56.5	3.3	0.7	4	3.5
6001437000	32.09	63.25	60-65%	3473 Alameda	12.3	75.6	12.1	31.6	23.6	9.1	1	29.7	5
6071002038	32.08	63.24	60-65%	5366 San Bernardino	11.6	82.6	5.8	38.8	21.3	20.9	0.3	15.5	3.2
6071010010	32.08	63.22	60-65%	6446 San Bernardino	17.1	74.3	8.6	58.4	31	6.6	0.5	1.7	1.8
6031000405	32.07	63.21	60-65%	6281 Kings	17.7	75.4	6.9	49.8	33.4	6	1.4	5.7	3.7
6099000505	32.06	63.20	60-65%	4895 Stanislaus	15.8	75.1	9.1	30.3	47.9	4.2	0.8	12.5	4.3
6065045209	32.06	63.19	60-65%	5441 Riverside	17.7	73.7	8.6	86.2	10.7	1.5	0.2	0.6	0.8
6065040702	32.06	63.17	60-65%	2746 Riverside	10.8	77.5	11.7	30.7	65	0.9	0.5	1.5	1.4
6071009908	32.05	63.16	60-65%	4817 San Bernardino	15.3	75.1	9.6	43.9	35.4	13.2	0.4	4.1	3
6107002009	32.05	63.15	60-65%	4376 Tulare	13.6	71.3	15.1	37.8	54.4	1.9	0.8	2.7	2.3
6037119800	32.05	63.14	60-65%	6108 Los Angeles	13.2	78.2	8.6	78.2	8.9	1	0.1	11.1	0.7
6037183103	32.03	63.12	60-65%	3967 Los Angeles	13.8	79	7.2	73	11.4	2.8	0.5	10.3	1.9
6097153003	32.03	63.11	60-65%	5502 Sonoma	15.3	77	7.7	42.1	47.5	2.3	1.1	4	2.9
6037124902	32.02	63.10	60-65%	2766 Los Angeles	9.5	73	17.5	24.5	57.8	6.5	0.3	7.4	3.4
6053010606	32.02	63.08	60-65%	6299 Monterey	17.4	76.2	6.4	74.8	16.2	0.7	0.2	7.3	0.8
6037400302	32.01	63.07	60-65%	3016 Los Angeles	9.5	73.5	17	37.9	49.8	2.8	0.4	7.5	1.7
6001433900	32.01	63.06	60-65%	6599 Alameda	20.1	75.1	4.8	47.4	9.9	26.8	0.3	12.6	3.1
6085503510	32.01	63.05	60-65%	5968 Santa Clara	18.1	74.9	7	77.2	7.6	1.2	0.3	12.7	1
6065045302	32.00	63.03	60-65%	4459 Riverside	17.6	72.5	9.9	90.8	7.1	0.9	0.1	0.5	0.6
6037432102	31.99	63.02	60-65%	5633 Los Angeles	10.4	75	14.6	20.1	22	0.4	0.1	55.5	2
6037482001	31.97	63.01	60-65%	2761 Los Angeles	8.4	59.7	31.9	11.8	7.8	0.2	0.1	77.8	2.4
6037650003	31.93	63.00	60-65%	3158 Los Angeles	11.3	78.9	9.8	27.8	27	7.5	0.1	33	4.6
6083000900	31.91	62.98	60-65%	3266 Santa Barbara	8.8	74.1	17.1	45.1	47.7	2.4	0.6	2.4	1.8
6059087701	31.90	62.97	60-65%	5323 Orange	13.5	72.6	13.9	38.2	29.2	3.4	0.4	26	2.8
6001433700	31.90	62.96	60-65%	3182 Alameda	14.1	78.6	7.3	45.6	22.6	11.3	0.8	15.3	4.5
6059087001	31.88	62.95	60-65%	5537 Orange	15.7	75.7	8.6	49.5	25.8	5	0.2	17.2	2.3
6071002027	31.88	62.93	60-65%	5543 San Bernardino	11.7	75.7	12.6	37.8	48.4	5.4	0.3	5.7	2.5
6069000100	31.88	62.92	60-65%	5007 San Benito	12.6	75.7	11.7	48.6	47.7	0.3	0.5	1.5	1.4
6065040903	31.88	62.91	60-65%	2626 Riverside	13	74.9	12.1	57.3	30.3	4.4	0.2	5.4	2.4
6059011000	31.88	62.90	60-65%	6626 Orange	12.1	76.1	11.8	32.3	50.9	1.9	0.2	11.7	3
6037408504	31.88	62.88	60-65%	5322 Los Angeles	12.1	77.4	10.5	54.2	12	0.8	0.1	31.6	1.2
6019001409	31.87	62.87	60-65%	1848 Fresno	13.4	70.5	16.1	36.5	39.7	7.4	0.3	12.8	3.4
6067007011	31.87	62.86	60-65%	5788 Sacramento	14	82	4	35.5	27	20	0.7	11	5.9
6073014300	31.85	62.85	60-65%	3618 San Diego	14.6	75.6	9.8	44.6	33.8	11.4	0.5	5.9	3.8
6019007902	31.84	62.83	60-65%	2742 Fresno	17.4	76.3	6.3	70.2	23.9	0.8	0.4	3.4	1.2
6065048300	31.83	62.82	60-65%	6649 Riverside	16.5	78.2	5.3	49.5	12.5	25.6	0.2	9.2	3
6107002903	31.82	62.81	60-65%	5097 Tulare	16.3	73.8	9.9	49.2	45.3	1.9	0.5	1.1	2.1

6075018000	31.82	62.79	60-65%	4221 San Francisco	3.3	94.1	2.6	14.3	43.2	20.2	0.7	17.2	4.4
6067007406	31.82	62.78	60-65%	7626 Sacramento	15.5	71.4	13.1	26.4	51.4	10.4	0.6	6.7	4.6
6029006404	31.82	62.77	60-65%	3564 Kern	20.3	74.4	5.3	92.2	7	0	0.1	0.4	0.3
6065045207	31.81	62.76	60-65%	5014 Riverside	19.9	71.7	8.4	80.6	14.8	2.5	0.1	1.3	0.7
6037461502	31.80	62.74	60-65%	6563 Los Angeles	13.2	71.8	15	57.7	17	19.7	0.1	3.8	1.7
6081610400	31.80	62.73	60-65%	5623 San Mateo	16.3	76.9	6.8	69.7	20.6	1.8	0.2	5.5	2.3
6067008907	31.79	62.72	60-65%	4835 Sacramento	15.5	71.6	12.9	23.2	55.1	10.3	0.7	5.7	4.9
6037267403	31.79	62.71	60-65%	3011 Los Angeles	3.9	86.5	9.6	13.3	62.5	1.8	0.2	17.4	4.9
6037212620	31.79	62.69	60-65%	4341 Los Angeles	11.9	78.6	9.5	42.5	5.7	4.1	0.1	46.3	1.2
6111003100	31.78	62.68	60-65%	14589 Ventura	15.9	77.5	6.6	70.6	11.7	1.8	0.2	13.9	1.8
6037543602	31.78	62.67	60-65%	7762 Los Angeles	11.4	73.1	15.5	31.9	20.8	8	0.5	35.6	3.2
6065031702	31.77	62.66	60-65%	2387 Riverside	12	76.4	11.6	43.1	47.3	1.9	0.5	4.8	2.5
6037275200	31.76	62.64	60-65%	3887 Los Angeles	11.4	80.6	8	49.4	30.9	5	0.2	11.4	3
6037431501	31.75	62.63	60-65%	4107 Los Angeles	8.8	71.1	20.1	31.5	27.4	1.4	0.1	37.8	1.8
6075012401	31.75	62.62	60-65%	5075 San Francisco	7.5	82.4	10.1	36.5	24.5	9.8	0.5	25.4	3.4
6037109300	31.75	62.61	60-65%	3085 Los Angeles	11	76	13	43.8	32.7	4.1	0.2	16.6	2.6
6107001703	31.73	62.59	60-65%	7149 Tulare	14.7	74.3	11	35.5	57.9	1.2	0.5	2.9	2
6065044101	31.73	62.58	60-65%	2973 Riverside	18.1	74.8	7.1	63.8	24.9	3.1	2	3.8	2.4
6037401703	31.73	62.57	60-65%	4176 Los Angeles	13.8	78.6	7.6	39	31.3	11.5	0.3	14.2	3.7
6059099222	31.72	62.56	60-65%	4733 Orange	11	71.3	17.7	13	26.3	0.3	0.2	57.4	2.9
6059087503	31.72	62.54	60-65%	6808 Orange	18	75.6	6.4	66.8	19.7	2	0.2	10	1.3
6111001302	31.72	62.53	60-65%	1778 Ventura	11.3	58.8	29.9	57.5	37.3	1.6	0.6	1.9	1.1
6037650902	31.71	62.52	60-65%	7103 Los Angeles	12.1	78.6	9.3	28.8	30.5	2.4	0.3	34.6	3.5
6065043003	31.71	62.50	60-65%	6600 Riverside	21.4	73.7	4.9	65.7	26.4	3.4	0.3	1.9	2.3
6065048700	31.69	62.49	60-65%	4489 Riverside	17.2	76.5	6.3	40.7	17.3	27.1	0.7	10.4	3.9
6013359103	31.68	62.48	60-65%	5051 Contra Costa	10.5	76.4	13.1	18.6	35.4	16.6	0.3	24.2	4.9
6077005207	31.66	62.47	60-65%	13899 San Joaquin	18.4	75.5	6.1	27.3	28.2	7.6	0.2	30.2	6.4
6037551502	31.66	62.45	60-65%	4250 Los Angeles	13.7	75.1	11.2	69.1	18.9	3.2	0.1	7.4	1.3
6085503218	31.64	62.44	60-65%	4471 Santa Clara	20	74.6	5.4	77.2	4.7	2	0.3	15	0.8
6065042720	31.62	62.43	60-65%	4434 Riverside	15.3	72.6	12.1	48.6	45.9	1.5	0.6	1.4	2
6111008600	31.62	62.42	60-65%	7982 Ventura	18.8	73.9	7.3	82	9.9	2.9	0.3	3.8	1.1
6095252604	31.61	62.40	60-65%	3674 Solano	15	72.6	12.4	36.8	25.4	20.9	0.5	9.6	6.8
6037543503	31.61	62.39	60-65%	5687 Los Angeles	9	71	20	29.6	18.9	7.8	0.2	40.8	2.8
6071011600	31.61	62.38	60-65%	7444 San Bernardino	12.2	67.2	20.6	19.3	69.7	4.8	0.7	3.3	2.3
6085500800	31.60	62.37	60-65%	2600 Santa Clara	8.8	77.5	13.7	41.6	30.1	5.3	0.2	19.4	3.3
6065042728	31.59	62.35	60-65%	2266 Riverside	14.5	69.4	16.1	37.6	48.5	5.3	0.7	5.7	2.3
6037204110	31.59	62.34	60-65%	3078 Los Angeles	15.6	72.5	11.9	97.4	0.6	0.4	0.1	1.3	0.2
6059099248	31.57	62.33	60-65%	5290 Orange	17	71.3	11.7	63.1	6.9	0.4	0.3	28.6	0.7
6085503305	31.56	62.32	60-65%	6069 Santa Clara	13.2	74.8	12	48.4	3.3	1.7	0.2	44.8	1.6
6071007106	31.54	62.30	60-65%	3943 San Bernardino	13	76.3	10.7	41	45.4	5.4	0.2	5.6	2.5
6011000200	31.52	62.29	60-65%	5121 Colusa	17	69.6	13.4	46.9	46.7	0.8	1.9	2	1.8
6059087101	31.52	62.28	60-65%	4635 Orange	13.8	77.7	8.5	37.9	22.7	3.9	0.2	32.6	2.6
6037703001	31.51	62.27	60-65%	5889 Los Angeles	9.4	79	11.6	12	38.4	28.1	0.3	15.6	5.6
6037208710	31.51	62.25	60-65%	4309 Los Angeles	10.9	80.7	8.4	32.4	5.2	5.5	0	55.3	1.6
6065042623	31.50	62.24	60-65%	3682 Riverside	13.8	73	13.2	29.9	32.5	22.7	0.2	11	3.7
6073005600	31.50	62.23	60-65%	4463 San Diego	3.5	82.6	13.9	15.3	65.4	6.3	0.3	9.5	3.2
6037267700	31.50	62.21	60-65%	2990 Los Angeles	6.6	82.5	10.9	18.7	40.8	2.3	0	33.5	4.6
6059086902	31.50	62.20	60-65%	5614 Orange	11.4	69.3	19.3	33.1	34.5	3.8	0.1	25.9	2.5
6001432300	31.50	62.19	60-65%	4656 Alameda	15.7	75.2	9.1	35.5	21.6	10.6	0.5	28.5	3.2
6037650300	31.49	62.18	60-65%	6704 Los Angeles	10.4	74.7	14.9	24.9	34.5	3.8	0.4	31.6	4.8
6037480303	31.49	62.16	60-65%	3858 Los Angeles	11.5	80.2	8.3	37.6	7.7	1.9	0.2	50.6	2
6097153102	31.47	62.15	60-65%	5742 Sonoma	18	75.5	6.5	66.4	23.2	1.8	2	4.7	1.9
6037481712	31.47	62.14	60-65%	5225 Los Angeles	8.6	75	16.4	16.9	1.6	0.2	0.1	80.3	0.9
6077005124	31.46	62.13	60-65%	3438 San Joaquin	14.6	74.6	10.8	38.2	48.6	4.4	0.5	5	3.4
6037192001	31.45	62.11	60-65%	2466 Los Angeles	8.2	74.6	17.2	11.9	74.1	5.2	0.2	6	2.6
6037404503	31.45	62.10	60-65%	2977 Los Angeles	14.6	76.4	9	74.1	8.9	2	0.2	13.7	1.1
6053010506	31.45	62.09	60-65%	4752 Monterey	21.8	72.8	5.4	79.8	13.2	2	0.2	3.6	1.3
6085503123	31.45	62.08	60-65%	3585 Santa Clara	15.4	75.5	9.1	46.4	26.8	11.4	0.7	11.9	2.9
6013308001	31.43	62.06	60-65%	7229 Contra Costa	12.5	75.7	11.8	30.1	49.1	11.3	0.4	5.5	3.6
6073012101	31.43	62.05	60-65%	2235 San Diego	15.4	70.7	13.9	77.1	13.2	1.6	0.4	6.7	0.9
6081606200	31.42	62.04	60-65%	8107 San Mateo	14.4	78.5	7.1	62.3	11.7	6.4	0.2	16.8	2.5
6059089102	31.41	62.03	60-65%	7217 Orange	14.8	76.1	9.1	64.9	11.6	1.2	0.2	20.9	1.3
6037211803	31.41	62.01	60-65%	3529 Los Angeles	10.6	82.9	6.5	16.7	5.3	6.9	0	69.5	1.6
6067009608	31.40	62.00	60-65%	7597 Sacramento	18.1	76.8	5.1	18.9	15.2	19.8	0.2	39.1	6.9
6047000802	31.40	61.99	60-65%	4296 Merced	15.6	72.2	12.2	42.9	41.9	3.8	0.7	7.5	3.3
6067009638	31.38	61.98	60-65%	4330 Sacramento	7.6	79.2	13.2	22.1	44.5	18.7	0.2	12.4	2.2
6019008000	31.37	61.96	60-65%	5277 Fresno	13.8	76.7	9.5	48.3	43.3	3.3	0.8	2.7	1.5
6037481901	31.36	61.95	60-65%	5770 Los Angeles	10.2	74.3	15.5	48.1	12.6	1	0.3	36.3	1.7
6037406102	31.36	61.94	60-65%	5828 Los Angeles	14.2	77.5	8.3	55.1	29.2	4.4	0.3	9.3	1.7
6107001704	31.35	61.92	60-65%	6500 Tulare	16.8	73.8	9.4	36.8	52.6	2.2	0.6	5.6	2.2
6019004211	31.35	61.91	60-65%	6319 Fresno	17.2	76.2	6.6	37.4	41.9	8	0.6	8.6	3.4
6087110501	31.35	61.90	60-65%	7646 Santa Cruz	18.3	73.2	8.5	78.2	17.3	0.5	0.4	2.2	1.4
6059099510	31.35	61.89	60-65%	4058 Orange	0	17.9	82.1	5.5	80.9	0.7	0.1	11.9	0.9
6067009606	31.34	61.87	60-65%	7159 Sacramento	15.9	72.4	11.7	31.5	16	25.4	0.3	21.7	5
6073002602	31.34	61.86	60-65%	4450 San Diego	19.4	75.7	4.9	62.6	9	10.2	0.2	16.1	2
6067004203	31.34	61.85	60-65%	5112 Sacramento	22.7	70.4	6.9	36.5	10	21.9	0.4	26.3	4.9
6053010306	31.33	61.84	60-65%	1250 Monterey	12.8	69.6	17.6	45.3	47.5	0.7	1.1	2.6	2.8
6001433400	31.31	61.82	60-65%	6305 Alameda	11.8	70	18.2	11.5	22.3	10.1	0.2	52.8	3.1
6087110200	31.31	61.81	60-65%	7399 Santa Cruz	16.5	74.2	9.3	75.7	18.1	0.2	0.4	3.8	1.7
6067007014	31.30	61.80	60-65%	7342 Sacramento	15.4	77.8	6.8	40.4	26.9	17.6	0.7	9.5	4.8
6013313204	31.30	61.79	60-65%	5542 Contra Costa	15.1	75.6	9.3	45	28.2	12.5	0.3	10.7	3.4
6071002801	31.29	61.77	60-65%	5508 San Bernardino	18.5	77.4	4.1	81.1	8.7	6.5	0.3	2.3	1.1
6037482522	31.29	61.76	60-65%	4269 Los Angeles	10	74.4	15.6	51.1	9.1	1.8	0	36.7	1.3
6069000702	31.29	61.75	60-65%	4948 San Benito	14.7	75.2	10.1	54.1	39.3	1.3	0.3	3.3	1.7
6065042213	31.28	61.74	60-65%	4194 Riverside	7.8	80.3	11.9	22.3	47.5	6.5	0.3	19.2	4.2
6059087801	31.27	61.72	60-65%	5337 Orange	15.2	73.5	11.3	44.3	30.3	3.1	0.1	19.5	2.7
6019005406	31.26	61.71	60-65%	3899 Fresno	11.2	71.2	17.6	28.4	57.8	2.9	0.8	7.4	2.6
6077004002	31.25	61.70	60-65%	10717 San Joaquin	17.2	76.2	6.6	24.6	31.6	10	0.3	28.5	5
6019005906	31.25	61.68	60-65%	2240 Fresno	9.6	75.4	15	26.7	64.7	0.4	1	4.6	2.5
6001434000	31.24	61.67	60-65%	4884 Alameda	16.4	74.8	8.8	45.8	17	17.3	0.3	16.1	3.6
6065043403	31.22	61.66	60-65%	2847 Riverside	18.4	69.3	12.3	47.6	37.5	9.7	0.7	1.8	2.8
6037106407	31.21	61.65	60-65%	2933 Los Angeles	16.5	67.2	16.3	76.2	14	6.4	0.1	2.5	0.8
6103000900	31.21	61.63	60-65%	3678 Tehama	13.2	69.3	17.5	23.9	70.1	0.2	2.3	0.7	2.9
6097153300	31.21	61.62	60-65%	11010 Sonoma	15	78.6	6.4	37.9	45.3	3.6	1.2	8.6	3.4
6037555212	31.21	61.61	60-65%	4561 Los Angeles	18.5	73.3	8.2	77.4	10.1	2.1	0.2	9	1.2
6019004406	31.20	61.60	60-65%	5211 Fresno	12	73.7	14.3	25	59.5	4.5	0.7	6.9	3.3
6053000400	31.19	61.58	60-65%	7161 Monterey	18.1	71.1	10.8	73.8	17.5	2.2	0.4	4.7	1.4
6001431000	31.18	61.57	60-65%	2714 Alameda	11.4	75.5	13.1	22.7	46.9	6.5	0.3	19.2	4.4
6111000302	31.17	61.56	60-65%	6786 Ventura	15.8	70.5	13.7	68.6	28.5	0.4	0.4	0.9	1.2
6059062611	31.17	61.55	60-65%	4105 Orange	7.8	83.2	9	11.2	42	2.4	0.1	39.5	4.8
6095252401	31.16	61.53	60-65%	4559 Solano	16	75	9	47.6	26.6	12.3	1	6.8	5.6
6037482702	31.14	61.52	60-65%	2397 Los Angeles	8.3	69.3	22.4	44.2	7	0.3	0.1	46.6	1.8
6037183101	31.14	61.51	60-65%	3922 Los Angeles	12.7	76.4	10.9	66.5	20.8	1.8	0.4	8.5	2
6037128801	31.13	61.50	60-65%	3307 Los Angeles	8.5	81.8	9.7	14.8	60.5	9.7	0.1	10.2	4.7
6095252502	31.12	61.48	60-65%	2275 Solano	10.9	84.3	4.8	33.5	31.9	23.7	1	4.7	5.3
6073003001	31.12	61.47	60-65%	4226 San Diego	15.3	71.7	13	45.1	6.5	39.4	0.2	5.9	2.9
6037275102	31.11	61.46	60-65%	4226 Los Angeles	14.7	77.4	7.9	67.1	19.8	2.3	0.1	8.6	2.1
6085505009	31.10	61.45	60-65%	6256 Santa Clara	15.5	78.4	6.1	23.9	28.8	7	0.3	35.8	4.2
6077004901	31.10	61.43	60-65%	7214 San Joaquin	13.5	73.9	12.6	27.1	68.7	0.4	0.8	1.3	1.6
6059076103	31.10	61.42	60-65%	9137 Orange	16.9	77	6.1	60.7	14	1.4	0.2	22.5	1.2
6001435400	31.10	61.41	60-65%	4503 Alameda	12	76.4	11.6	33.1	26.3	19.5	0.6	16.2	4.4
6037600704	31.08	61.39	60-65%	2971 Los Angeles	9.9	71.6	18.5	9.7	1.8	85.1	0.2	0.8	2.5
6037125402	31.08	61.38	60-65%	3544 Los Angeles	6.8	86	7.2	20	59.9	9.5	0.2	6.6	3.8
6067007010	31.08	61.37	60-65%	3626 Sacramento	13.2	82.7	4.1	23.3	47.5	13.5	0.6	9.2	5.9
6037106646	31.06	61.36	60-65%	3237 Los Angeles	10.8	73.1	16.1	34.2	42.4	3.5	0.1	17	2.9
6037403312	31.06	61.34	60-65%	5160 Los Angeles	11.4	77.9	10.7	33.8	24.1	4.4	0.2	35.2	2.4
6085503213	31.05	61.33	60-65%	4494 Santa Clara	14.3	76.4	9.3	33.6	6.3	2.2	0.1	57	0.8
6037650001	31.02	61.32	60-65%	5853 Los Angeles	9.2	72	18.8	20	25.4	2.9	0.2	47.4	4.2
6067009800	31.02	61.31	60-65%	1984 Sacramento	8.1	67.3	24.6	26.1	66.2	0.8	0.6	3.3	3
6037190402	31.01	61.29	60-65%	2487 Los Angeles	6	79.1	14.9	17.9	60.1	4.5	0.1	14	3.5
6001438400	31.00	61.28	60-65%	2331 Alameda	9.6	74.5	15.9	32.7	24.6	5.1	0.5	33.4	3.7
6113011206	30.97	61.27	60-65%	7329 Yolo	14.2	78.4	7.4	33.8	49.5	2.3	0.5	11	2.8
6037570701	30.97	61.26	60-65%	6569 Los Angeles	11.9	74.7	13.4	25.3	30.9	20	0.2	20	3.6

6095252904	30.95	61.24	60-65%	4726 Solano	10.7	76.6	12.7	20	60	5.5	0.8	9.8	3.8
6037267501	30.94	61.23	60-65%	5379 Los Angeles	8.9	84.4	6.7	32.7	40.7	2.5	0.1	20.2	3.8
6065043701	30.93	61.22	60-65%	3512 Riverside	11.7	66.2	22.1	26.2	67.4	2.2	1.2	1.4	1.7
6065043206	30.93	61.21	60-65%	7606 Riverside	14.1	75.7	10.2	29.9	53.2	5.8	0.4	7.2	3.5
6037207501	30.91	61.19	60-65%	2218 Los Angeles	4.2	84.4	11.4	14.5	27.5	7.9	0.3	46.4	3.3
6059032014	30.90	61.18	60-65%	6323 Orange	13.9	65.2	20.9	52	36	1	0.2	8.5	2.2
6037402002	30.90	61.17	60-65%	3913 Los Angeles	11.3	71.2	17.5	32.5	50.7	5.8	0.4	7	3.6
6065043821	30.90	61.16	60-65%	2707 Riverside	22.6	71.7	5.7	47.4	33	9.7	0.6	6.8	2.5
6065051100	30.89	61.14	60-65%	6188 Riverside	18.1	77.4	4.5	47	15.5	26.4	0.3	7.4	3.4
6059001507	30.88	61.13	60-65%	4665 Orange	11.2	79.1	9.7	25.6	49	1.9	0.3	19.8	3.4
6059074902	30.88	61.12	60-65%	6627 Orange	22.4	74.6	3	97.3	1.6	0.1	0.1	0.8	0.1
6029000700	30.87	61.10	60-65%	4825 Kern	14.5	74.6	10.9	42.5	50.5	1.7	0.8	1.8	2.6
6059011712	30.86	61.09	60-65%	4865 Orange	12	78.6	9.4	50.9	30.1	2.3	0.2	14.1	2.4
6065043312	30.86	61.08	60-65%	3862 Riverside	15.8	74.3	9.9	53.5	39.6	2.7	0.8	1.9	1.6
6037106010	30.86	61.07	60-65%	3152 Los Angeles	13.5	76.4	10.1	67.1	19.7	5.2	0.3	5.8	1.9
6059087802	30.85	61.05	60-65%	7146 Orange	14.3	75.8	9.9	45.3	25.8	2.8	0.3	23.4	2.4
6037554512	30.84	61.04	60-65%	6108 Los Angeles	8.1	73.4	18.5	9.3	14.3	6.6	0	66.9	2.8
6053014302	30.81	61.03	60-65%	4024 Monterey	13.1	75.5	11.4	24.7	39.5	6.3	0.3	22.5	6.8
6013307205	30.81	61.02	60-65%	6595 Contra Costa	14.9	75.5	9.6	31.1	38.8	17.2	0.5	7.4	5
6087110100	30.81	61.00	60-65%	7466 Santa Cruz	17	68.2	14.8	74.8	19.9	0.3	0.4	3.4	1.2
6037125401	30.81	60.99	60-65%	4024 Los Angeles	6	87.8	6.2	27.4	46.7	14.3	0.2	7.2	4.2
6037408003	30.80	60.98	60-65%	4992 Los Angeles	13	76.6	10.4	60.5	9.9	4.2	0.2	23.8	1.3
6011000500	30.79	60.97	60-65%	2565 Colusa	17	70.6	12.4	48.4	47.2	0.3	1.4	1.4	1.4
6037109601	30.79	60.95	60-65%	5020 Los Angeles	13.2	75.5	11.3	70	15	2.9	0.1	10.2	1.6
6001433103	30.78	60.94	60-65%	3530 Alameda	16.3	76.6	7.1	39.9	14.5	24.2	0.2	17.7	3.4
6037102104	30.75	60.93	60-65%	3648 Los Angeles	8.8	76.8	14.4	14.6	66.8	2.4	0.1	13	3.2
6071008704	30.74	60.92	60-65%	7789 San Bernardino	12.9	72.8	14.3	28.1	65.1	1.6	0.4	2.7	1.9
6095250601	30.74	60.90	60-65%	4695 Solano	14.9	75.7	9.4	35.1	20.2	24.3	0.6	13.8	6
6071007409	30.74	60.89	60-65%	5760 San Bernardino	16.6	74.4	9	51.9	29.5	10.8	0.4	4.9	2.5
6073002402	30.71	60.88	60-65%	5254 San Diego	19.1	76.9	4	68.7	6.4	9.3	0.2	13.5	2
6065043404	30.71	60.87	60-65%	2544 Riverside	7.4	47	45.6	25.4	66.4	3.6	0.7	1.7	2.2
6037403722	30.70	60.85	60-65%	5734 Los Angeles	15.8	76	8.2	62.5	21.7	3.7	0.2	9.8	2.1
6001408700	30.69	60.84	60-65%	7207 Alameda	16.5	74.9	8.6	44.9	3.9	43.6	0.1	5.4	2
6059099247	30.69	60.83	60-65%	3287 Orange	13.2	77.4	9.4	45.2	6.8	0.5	0.3	46.3	0.8
6037189904	30.68	60.81	60-65%	2260 Los Angeles	3.3	89.8	6.9	13.3	70.6	4.3	0.1	7.3	4.4
6065042402	30.66	60.80	60-65%	4780 Riverside	13.2	79.1	7.7	52.8	27.7	11.4	0.4	4.9	2.8
6071004504	30.66	60.79	60-65%	8145 San Bernardino	17.5	78.6	3.9	42.6	35	13.4	0.5	5	3.6
6089011002	30.66	60.78	60-65%	5324 Shasta	12	69.4	18.6	7.8	83.6	0.5	3.2	1.4	3.6
6037269800	30.65	60.76	60-65%	3458 Los Angeles	9.7	82.5	7.8	26	38.5	11.1	0.3	19.7	4.4
6037408505	30.65	60.75	60-65%	2682 Los Angeles	10	73.7	16.3	44.9	17.6	1.8	0.1	34.2	1.4
6007000603	30.64	60.74	60-65%	3130 Butte	3.7	92.2	4.1	12.2	78.8	1.7	0.4	2.1	4.9
6073020601	30.63	60.73	60-65%	5560 San Diego	20.6	75	4.4	75.6	18.5	2.1	0.5	2.1	1.2
6001425101	30.63	60.71	60-65%	1596 Alameda	2.6	73.3	24.1	3.5	59	6	0	27	4.4
6085503212	30.63	60.70	60-65%	4058 Santa Clara	12.3	78.1	9.6	31.5	7.9	2.6	0.3	56	1.7
6037113301	30.62	60.69	60-65%	2201 Los Angeles	9.2	70	20.8	19.6	57.4	4	0.1	15.8	3.1
6037572002	30.62	60.68	60-65%	4409 Los Angeles	9.2	67.7	23.1	17.4	37.7	20.3	0.4	20	4.2
6037311400	30.61	60.66	60-65%	2274 Los Angeles	11.2	74.4	14.4	16.6	70.4	1.5	0.2	8.3	3
6037214800	30.60	60.65	60-65%	2573 Los Angeles	6.5	76	17.5	7	82.6	3.1	0.2	4.5	2.5
6037602302	30.60	60.64	60-65%	3477 Los Angeles	12.4	73.3	14.3	20.4	61.3	2.4	0.2	11.3	4.4
6085512506	30.60	60.63	60-65%	6686 Santa Clara	19.4	74.5	6.1	72.3	18.8	1.6	0.4	5	1.9
6037311600	30.59	60.61	60-65%	7249 Los Angeles	8.4	80.2	11.4	16	64.4	5.1	0.3	11.1	3.2
6081612100	30.58	60.60	60-65%	7041 San Mateo	20	76.3	3.7	60.4	20.3	8	0.1	9.1	2.1
6047000702	30.56	60.59	60-65%	4903 Merced	14.9	73.7	11.4	30.5	58.7	1.7	0.5	6.4	2.2
6037702801	30.55	60.58	60-65%	5205 Los Angeles	10	75.1	14.9	31.1	41.2	4.8	0.1	19	3.8
6001424002	30.55	60.56	60-65%	2172 Alameda	11.6	77.2	11.2	17	27.9	41.7	0.7	7.5	5.1
6067001900	30.55	60.55	60-65%	2771 Sacramento	6	85.7	8.3	21.3	57.8	6.3	1	8.6	5.1
6067003203	30.54	60.54	60-65%	3200 Sacramento	16.1	74.9	9	23.7	8.2	10.6	0.4	53.3	3.8
6059088104	30.53	60.52	60-65%	4780 Orange	13.9	70.8	15.3	36.8	29.2	1.9	0.3	29.9	1.9
6071002304	30.50	60.51	60-65%	18904 San Bernardino	17	78.2	4.8	42.1	23.9	16.4	0.2	14.4	3
6073010402	30.50	60.50	60-65%	5558 San Diego	16.1	76.8	7.1	58	22.1	4.6	0.6	10.9	3.8
6037408137	30.50	60.49	60-65%	4152 Los Angeles	12.5	78.6	8.9	39.8	9.7	6.6	0.2	42	1.7
6037106406	30.49	60.47	60-65%	4962 Los Angeles	14.5	75.2	10.3	70.8	18.8	2.6	0.6	6.1	1
6071011203	30.48	60.46	60-65%	1593 San Bernardino	9.6	67.5	22.9	17.4	78.7	0.2	0.6	1.1	2.1
6065043602	30.47	60.45	60-65%	3953 Riverside	19.8	73.2	7	71.3	21.3	3.7	0.8	0.9	2
6037900504	30.47	60.44	60-65%	5816 Los Angeles	18.5	75.8	5.7	41.4	29.3	21.4	0.5	5	2.3
6001405700	30.46	60.42	60-65%	3243 Alameda	12.4	78.7	8.9	17.2	10.7	32.3	0.4	36	3.4
6037185100	30.46	60.41	60-65%	6295 Los Angeles	11.9	75.6	12.5	53.1	31.6	2.6	0.2	9.9	2.6
6065048901	30.46	60.40	60-65%	3805 Riverside	16.1	78.3	5.6	59.8	19.7	14.5	0.4	3.2	2.5
6019003104	30.45	60.39	60-65%	3810 Fresno	12.9	75.3	11.8	33.1	48.2	3.5	0.5	11.8	2.9
6073005400	30.45	60.37	60-65%	7435 San Diego	2.7	82.8	14.5	11.4	71.9	5.2	0.3	8.6	2.6
6073003304	30.45	60.36	60-65%	3563 San Diego	20	73.9	6.1	65.6	4.9	13.5	0.1	14.3	1.5
6099003604	30.45	60.35	60-65%	8092 Stanislaus	14.2	74.5	11.3	28.6	65.2	0.4	0.6	3	2.2
6037554103	30.44	60.34	60-65%	1572 Los Angeles	15.8	76.6	7.6	54.3	21.1	9.5	0.1	12.5	2.5
6037430902	30.44	60.32	60-65%	4652 Los Angeles	13.2	75.4	11.4	39.6	30	5.4	0.2	22.1	2.6
6037183701	30.44	60.31	60-65%	3922 Los Angeles	14.6	78	7.4	83.1	8.2	2.7	0.4	4.5	1
6065042622	30.42	60.30	60-65%	4107 Riverside	16.5	79.3	4.2	44.2	18.2	18	0.3	15.6	3.7
6095252608	30.41	60.29	60-65%	3807 Solano	18.9	71.8	9.3	40.2	23.6	21.4	0.1	8.6	6.1
6059076206	30.40	60.27	60-65%	4517 Orange	13.2	70.7	16.1	33.9	58.1	0.8	0.2	5.2	1.8
6037910501	30.40	60.26	60-65%	5339 Los Angeles	25.3	68.2	6.5	54.9	10.5	28.9	0.2	2.4	3
6001437400	30.40	60.25	60-65%	3408 Alameda	15.3	74.3	10.4	55.8	18.5	4.5	0.5	17.7	3
6001407600	30.39	60.23	60-65%	6027 Alameda	15.6	76	8.4	34.8	11.4	35.3	0.6	13.9	4
6037432101	30.38	60.22	60-65%	4179 Los Angeles	11.7	74.8	13.5	21.9	21.9	0.7	0.2	53.9	1.4
6037271801	30.35	60.21	60-65%	3635 Los Angeles	9	82.9	8.1	33.9	33.1	5	0.2	23.6	4.1
6071010803	30.35	60.20	60-65%	3375 San Bernardino	11	78.2	10.8	15.8	78.4	0.7	0.9	1.2	3.1
6085503711	30.35	60.18	60-65%	4763 Santa Clara	18.3	76.2	5.5	80.6	1.8	1.3	0.1	15.3	0.9
6037482701	30.35	60.17	60-65%	4298 Los Angeles	11.7	71.9	16.4	63.7	5.2	0.3	0.2	29.8	0.8
6111004506	30.35	60.16	60-65%	7858 Ventura	22.2	73.8	4	88.6	4.1	1.1	0.2	5.2	0.9
6111002200	30.34	60.15	60-65%	6288 Ventura	15.6	78.5	5.9	58.8	35.4	1.2	0.4	1.9	2.3
6085500902	30.33	60.13	60-65%	4523 Santa Clara	2.6	96.2	1.2	23.3	32.5	9.8	0.4	30	3.9
6065041809	30.33	60.12	60-65%	5834 Riverside	12.3	74.9	12.8	37.2	45.5	6.3	0.4	8.1	2.5
6037185204	30.33	60.11	60-65%	2091 Los Angeles	11.2	73.5	15.3	42.9	27.8	2.6	0	23.6	3.2
6037183702	30.33	60.10	60-65%	2805 Los Angeles	12.2	77.7	10.1	57.8	16.2	4	0.3	19.9	1.9
6067007422	30.32	60.08	60-65%	2692 Sacramento	17.7	75.7	6.6	21.5	56.8	10.1	0.8	5.6	5.1
6071011205	30.32	60.07	60-65%	1239 San Bernardino	13.9	69.8	16.3	37	55	0.4	1.2	2.9	3.5
6111004600	30.30	60.06	60-65%	2126 Ventura	27.5	72.2	0.3	20.6	62.1	6.7	0.5	5.1	4.9
6037310202	30.30	60.05	60-65%	4985 Los Angeles	10.1	78.5	11.4	13	71.5	1.8	0.1	9.5	4.1
6037900804	30.30	60.03	60-65%	3489 Los Angeles	20.1	73.7	6.2	53	19.2	22.4	0.3	2.4	2.7
6073008511	30.30	60.02	60-65%	2633 San Diego	8.3	81.6	10.1	16.3	51.3	4.5	0.4	23.3	4.2
6071007403	30.29	60.01	60-65%	6947 San Bernardino	13.9	73.1	13	40.6	36.7	15.7	0.4	3.9	2.8
6037404302	30.29	59.99	55-60%	2498 Los Angeles	14.2	77.8	8	85.9	9.1	1.1	0.1	3.1	0.6
6037273200	30.28	59.98	55-60%	3711 Los Angeles	8.9	84.5	6.6	34.5	47.7	11.9	0.6	2.4	2.9
6059076000	30.27	59.97	55-60%	8371 Orange	11.2	77.9	10.9	44.7	39.6	2.1	0.3	11.3	2
6001406400	30.26	59.96	55-60%	2145 Alameda	10.1	60.3	29.6	17.3	24.6	27.5	0.5	27.1	3
6111003300	30.26	59.94	55-60%	8187 Ventura	15.4	73.6	11	73	17.9	3.6	0.2	3.3	2
6085502102	30.26	59.93	55-60%	7469 Santa Clara	16.2	76.3	7.5	50.8	27.4	5.1	0.2	13.9	2.6
6037310602	30.25	59.92	55-60%	2655 Los Angeles	9.9	76.4	13.7	20.5	58.5	2.7	0	15.4	2.9
6001435500	30.23	59.91	55-60%	3725 Alameda	14	74.4	11.6	41.8	28.2	12.9	0.7	12.5	3.9
6065042410	30.22	59.89	55-60%	4882 Riverside	12.8	79.6	7.6	38.8	27.5	21.9	0.3	7.8	3.6
6077005003	30.22	59.88	55-60%	5417 San Joaquin	14.6	74	11.4	20.9	68.7	1.4	0.6	5.9	2.6
6107002002	30.22	59.87	55-60%	4830 Tulare	15.4	69.9	14.7	37.7	54.2	1.8	0.5	3.2	2.5
6085501101	30.21	59.86	55-60%	4074 Santa Clara	9.8	77.8	12.4	38.6	28.5	3.3	0.4	24.5	4.7
6037573403	30.21	59.84	55-60%	3208 Los Angeles	11.6	78.6	9.8	18.6	41.7	11.5	0.2	24	3.9
6059088905	30.20	59.83	55-60%	5282 Orange	11.7	72.8	15.5	17.8	11.1	0.4	0	69.4	1.2
6037408141	30.18	59.82	55-60%	5450 Los Angeles	15.5	76.5	8	81.6	3.7	1.5	0.1	12.5	0.6
6037217002	30.18	59.81	55-60%	4977 Los Angeles	10.2	78	11.8	10.9	66.3	9.6	0.1	8.5	4.6
6037311700	30.16	59.79	55-60%	6137 Los Angeles	8.7	74.6	16.7	19.1	65.1	2.5	0.1	10.1	3.1
6073012200	30.16	59.78	55-60%	3326 San Diego	15.2	74.8	10	71.1	15	2.1	0.2	9.5	2
6037277100	30.16	59.77	55-60%	3004 Los Angeles	12.8	74.3	12.9	24.1	51.7	4.8	0.1	13.6	5.7
6099000906	30.16	59.76	55-60%	5810 Stanislaus	12.1	75	12.9	24	65.2	3.1	0.6	4.1	3
6073016302	30.14	59.74	55-60%	5444 San Diego	17	76.5	6.5	41.1	42.2	7.2	0.3	4	5.3
6037920017	30.14	59.73	55-60%	4342 Los Angeles	10.6	79.7	9.7	24.9	65.6	1.3	0.5	5.2	2.5
6037504002	30.13	59.72	55-60%	5383 Los Angeles	11.6	75.9	12.5	43.1	41.5	2.1	0.4	10.6	2.3
6059099249	30.12	59.70	55-60%	4449 Orange	20.5	75.4	4.1	81.7	1.7	0.4	0.2	15.3	0.7

6037553400	30.12	59.69	55-60%	3861 Los Angeles	13.9	77.5	8.6	82.6	9.1	2.3	0.4	4.3	1.4
6037481605	30.10	59.68	55-60%	3387 Los Angeles	10.2	76.8	13	35	4.7	0.3	0.2	58.4	1.5
6007003400	30.10	59.67	55-60%	2956 Butte	15.5	68	16.5	36.9	56.2	0.2	1.2	3	2.6
6001405402	30.09	59.65	55-60%	3114 Alameda	12.3	78.1	9.6	19.7	8.8	23.1	0.1	45.8	2.4
6037482002	30.08	59.64	55-60%	6947 Los Angeles	10.8	69.4	19.8	25.6	5.2	0.5	0.2	66.7	1.9
6059063702	30.08	59.63	55-60%	5767 Orange	13	80.2	6.8	54.2	37.3	1.1	0.3	5.3	1.8
6037481102	30.07	59.62	55-60%	3624 Los Angeles	11.4	79.8	8.8	27.6	7.8	2.2	0.1	60.2	2.2
6037405500	30.07	59.60	55-60%	6808 Los Angeles	13.3	75.2	11.5	61.8	19.3	2.3	0.1	14.8	1.7
6073018517	30.07	59.59	55-60%	4127 San Diego	10.8	71.4	17.8	30.5	54.7	4.5	0.3	6.8	3.1
6037269906	30.04	59.58	55-60%	2878 Los Angeles	6.8	88.1	5.1	23.2	39.2	10.1	0.2	23.4	3.9
6111004717	30.04	59.57	55-60%	4120 Ventura	19.8	74.3	5.9	88	4.3	1.3	0.2	5.4	0.7
6013367100	30.04	59.55	55-60%	5099 Contra Costa	13	72.9	14.1	29.6	8.9	43.1	0.1	14.8	3.5
6111005600	30.03	59.54	55-60%	9976 Ventura	14.3	70.2	15.5	24.8	58.7	1.6	0.2	11.8	2.9
6019004408	30.03	59.53	55-60%	3517 Fresno	10.5	78.7	10.8	26.8	54.1	4.7	0.5	10.9	3
6037406500	30.03	59.52	55-60%	6705 Los Angeles	14.3	76	9.7	60.9	16.6	3	0.2	17.3	2
6013301000	30.02	59.50	55-60%	3659 Contra Costa	9.8	70.9	19.3	16.3	70.8	4.7	0.5	4.3	3.4
6085512508	30.00	59.49	55-60%	7955 Santa Clara	15.2	73.4	11.4	58.3	34.4	0.9	0.3	4.5	1.6
6037401500	30.00	59.48	55-60%	5572 Los Angeles	11.4	78.4	10.2	45.1	40.2	4.3	0.4	7.5	2.5
6001403400	29.99	59.47	55-60%	4146 Alameda	5	76.3	18.7	9.3	32.6	19.7	0.3	32.7	5.4
6085508900	29.99	59.45	55-60%	5273 Santa Clara	15.6	77.2	7.2	41.7	18.4	1.8	0.3	35	2.7
6077005308	29.98	59.44	55-60%	4189 San Joaquin	15.3	73.9	10.8	38	37.5	6.9	0.6	12.7	4.3
6001442500	29.98	59.43	55-60%	7371 Alameda	12.5	74.7	12.8	23.7	28.7	3.2	0.3	40.1	4
6013320004	29.96	59.41	55-60%	6216 Contra Costa	12.8	78.9	8.3	15	65.7	3.4	0.6	10.8	4.5
6037503501	29.96	59.40	55-60%	6481 Los Angeles	14.8	77.1	8.1	68.3	25	1.1	0.4	3.9	1.2
6077003306	29.96	59.39	55-60%	4229 San Joaquin	15.9	72.8	11.3	42.5	20.9	9.6	0.5	22.1	4.4
6065040616	29.96	59.38	55-60%	7610 Riverside	18.4	76.1	5.5	35.9	20.8	10.9	0.1	29.4	2.9
6059110604	29.96	59.36	55-60%	8117 Orange	9.8	75.1	15.1	16.5	29.6	2.7	0.2	49	2.1
6059088106	29.95	59.35	55-60%	4638 Orange	12.3	77.5	10.2	31.6	27.3	1.3	0.7	36.9	2.2
6113011400	29.95	59.34	55-60%	4193 Yolo	13.8	70.9	15.3	48.6	44.4	2.8	0.6	1.4	2.2
6067003800	29.95	59.33	55-60%	5083 Sacramento	14.2	70.8	15	33.5	19.3	26.4	0.3	16.1	4.5
6053001200	29.94	59.31	55-60%	3178 Monterey	11.9	73.1	15	40.2	51.7	1.2	0.3	4.3	2.4
6001435700	29.93	59.30	55-60%	4594 Alameda	14.5	74.5	11	45	27	7.3	0.2	17.6	2.9
6065049800	29.93	59.29	55-60%	3771 Riverside	16.1	77.1	6.8	35.3	52.1	3.5	0.3	5.1	3.7
6037404504	29.93	59.28	55-60%	5266 Los Angeles	17.8	75.6	6.6	84.4	6.4	2.4	0.2	6	0.7
6095251803	29.92	59.26	55-60%	4988 Solano	14.4	72.5	13.1	38	16.4	12.9	0.1	28.8	3.8
6085500300	29.92	59.25	55-60%	3140 Santa Clara	11.2	83.4	5.4	38.7	41.7	3.3	0.6	11.9	3.9
6107002302	29.91	59.24	55-60%	4570 Tulare	16.3	73.8	9.9	41.1	51.3	2.7	0.7	2.4	1.8
6037702802	29.90	59.23	55-60%	2282 Los Angeles	11.4	75.3	13.3	40.4	41.8	2.7	0.4	11	3.6
6103000800	29.90	59.21	55-60%	4112 Tehama	14.2	71.8	14	34.9	59.2	0.4	2.5	0.6	2.3
6037181000	29.90	59.20	55-60%	6144 Los Angeles	9.8	71.2	19	27.6	41.7	1.5	0.3	25.9	3
6013365003	29.90	59.19	55-60%	4924 Contra Costa	11.2	79.3	9.5	20.7	14.3	34.9	0.3	24.5	5.2
6065042012	29.90	59.18	55-60%	6242 Riverside	15.4	79.6	5	29.8	45.9	9.7	0.4	11	3.3
6029001802	29.89	59.16	55-60%	5408 Kern	13.4	73.4	13.2	27.7	57.2	7	0.9	4.7	2.5
6019004506	29.87	59.15	55-60%	3158 Fresno	8.1	63.6	28.3	17.1	73.3	2.2	0.5	3.9	3
6037461901	29.87	59.14	55-60%	5118 Los Angeles	15.8	78.6	5.6	67.9	12.3	11.6	0.1	6.2	1.9
6013306003	29.86	59.12	55-60%	4881 Contra Costa	13.6	72.6	13.8	36.9	45.7	9	0.6	3.7	4.1
6059011200	29.85	59.11	55-60%	3916 Orange	11.9	71.5	16.6	31	56.3	1.4	0.3	8.5	2.6
6037265510	29.85	59.10	55-60%	4234 Los Angeles	3.4	88.7	7.9	7	47.9	2.1	0.1	38.5	4.4
6037106408	29.85	59.09	55-60%	3463 Los Angeles	19.8	76.9	3.3	86.8	4.5	3.3	0.1	4.3	1
6085503304	29.84	59.07	55-60%	6916 Santa Clara	16.2	72.6	11.2	43.9	6.2	2.7	0.1	45.2	2
6037403323	29.84	59.06	55-60%	5356 Los Angeles	8.9	78.6	12.5	11.8	18.2	2.9	0.1	65.2	1.8
6029006403	29.84	59.05	55-60%	5824 Kern	21.8	73.1	5.1	94.7	4.4	0.3	0.2	0.2	0.2
6053000600	29.83	59.04	55-60%	7143 Monterey	21.8	73.7	4.5	96.4	2.4	0.3	0.1	0.3	0.5
6065049000	29.79	59.02	55-60%	8249 Riverside	17.1	78.2	4.7	41.5	18.5	24.2	0.2	12.6	3.1
6037293302	29.77	59.01	55-60%	4720 Los Angeles	13.7	76.4	9.9	44.7	24.3	5.7	0.1	22.8	2.5
6001433000	29.76	59.00	55-60%	3832 Alameda	11.7	73	15.3	28.3	35.8	8.2	0.3	24	3.3
6059086303	29.76	58.99	55-60%	6212 Orange	10.8	79.2	10	43.7	34.1	2.7	0.2	16.6	2.7
6037461000	29.75	58.97	55-60%	6243 Los Angeles	13.5	75.8	10.7	53.8	8.6	30.9	0.2	3.3	3.1
6037106113	29.72	58.96	55-60%	3493 Los Angeles	14.4	74	11.6	76.4	15.7	2.1	0.5	4.6	0.6
6019007201	29.72	58.95	55-60%	7671 Fresno	14.8	71.5	13.7	34.9	57.4	0.2	0.6	4.8	2.1
6107003601	29.72	58.94	55-60%	7090 Tulare	17.5	72.5	10	54.5	36.9	0.8	1	4.8	1.8
6001435601	29.72	58.92	55-60%	4902 Alameda	17	75.2	7.8	57.5	17.4	12.1	0.6	9	3.4
6037214902	29.71	58.91	55-60%	2586 Los Angeles	6	74.1	19.9	7.2	74.6	3	0	11.7	3.5
6065043313	29.71	58.90	55-60%	3504 Riverside	17.4	75.5	7.1	51.6	40.3	4.1	1.1	1.1	1.8
6037189202	29.71	58.89	55-60%	2718 Los Angeles	8.3	74.1	17.6	10	73.1	1.3	0.2	11.7	3.7
6059076202	29.70	58.87	55-60%	5812 Orange	13.5	76	10.5	38.6	49.3	1.9	0.5	7.8	1.9
6059088401	29.69	58.86	55-60%	5317 Orange	12.5	76.8	10.7	43	26.5	0.9	0.3	27.1	2.2
6059021903	29.69	58.85	55-60%	4034 Orange	12.1	75	12.9	29.2	48.8	1.7	0.2	17.1	3
6037920337	29.69	58.83	55-60%	7257 Los Angeles	19.7	76.7	3.6	72	15.5	4	0.2	6.5	1.7
6037212101	29.69	58.82	55-60%	2507 Los Angeles	9.2	83.5	7.3	29.5	9.3	6.5	0.2	52.5	2
6073013307	29.69	58.81	55-60%	3966 San Diego	12.5	74	13.5	71.3	13.1	4.4	0.1	9.1	2
6059087002	29.68	58.80	55-60%	6922 Orange	13.8	75.5	10.7	40.1	31.5	3.8	0.3	22.3	2
6065043316	29.67	58.78	55-60%	3713 Riverside	8.4	43.4	48.2	15.1	67.7	7.8	0.4	6.2	2.9
6037920029	29.67	58.77	55-60%	3574 Los Angeles	12.7	79	8.3	34.5	54	2.7	0.3	4.7	3.8
6037109100	29.67	58.76	55-60%	2492 Los Angeles	10.8	62.4	26.8	57.4	29.2	2.7	0.2	9.6	0.9
6037103300	29.67	58.75	55-60%	3819 Los Angeles	9.3	75.5	15.2	19.5	71	0.9	0.3	5.8	2.5
6089012200	29.66	58.73	55-60%	5379 Shasta	13.1	72.7	14.2	9.8	81.9	0.3	2.2	2.2	3.4
6037134201	29.66	58.72	55-60%	4270 Los Angeles	15	75.2	9.8	54.5	27.6	2.5	0.1	13.5	1.8
6083002101	29.65	58.71	55-60%	3873 Santa Barbara	19.5	72.7	7.8	62.4	31.2	1.8	0.6	1.6	2.3
6059110402	29.65	58.70	55-60%	5459 Orange	15.8	75.3	8.9	54.7	21.1	3.1	0.4	18.3	2.4
6001444302	29.64	58.68	55-60%	4354 Alameda	16.7	76.4	6.9	48.3	19.1	4.6	0.6	22.9	4.5
6071008601	29.64	58.67	55-60%	5618 San Bernardino	13.6	78	8.4	37.6	49.4	5.3	0.7	4	3
6085504418	29.63	58.66	55-60%	4883 Santa Clara	14.5	77	8.5	31.7	11.2	2.5	0.2	50.9	3.4
6115040600	29.63	58.65	55-60%	6130 Yuba	16.5	73.9	9.6	37	50.2	1.6	2.3	5.5	3.5
6059042201	29.63	58.63	55-60%	5639 Orange	9.7	71.5	18.8	20.1	73.9	0.5	0.4	2.6	2.5
6059075806	29.56	58.62	55-60%	6121 Orange	14.4	73.2	12.4	48.1	41.5	1.4	0.2	7.2	1.6
6037275302	29.55	58.61	55-60%	4775 Los Angeles	7	68.5	24.5	14.1	64.1	4.6	0.1	12.9	4.3
6109001200	29.55	58.60	55-60%	3678 Tuolumne	11.5	72.9	15.6	11	81.9	0.5	1	2.5	3
6001422100	29.54	58.58	55-60%	2685 Alameda	11.7	77.9	10.4	28.3	36.9	15.8	0.4	12.6	6.1
6013329000	29.52	58.57	55-60%	6309 Contra Costa	11.6	78	10.4	34.2	49.8	2.7	0.3	8.8	4.2
6083002103	29.51	58.56	55-60%	3930 Santa Barbara	16.4	70.5	13.1	57.5	31.3	1.9	0.5	7.2	1.6
6029000800	29.50	58.54	55-60%	4925 Kern	16.2	72	11.8	57.7	34.7	2.7	0.9	1.7	2.4
6037186100	29.50	58.53	55-60%	4715 Los Angeles	10.3	74.8	14.9	35	30.3	1.4	0.2	30	3.2
6001401100	29.50	58.52	55-60%	4156 Alameda	7.6	86.2	6.2	12.6	46.5	23.5	0.5	10.8	6.3
6037211121	29.50	58.51	55-60%	2351 Los Angeles	9.5	80.9	9.6	45.2	8.7	4.8	0.1	38.7	2.5
6099003606	29.49	58.49	55-60%	10838 Stanislaus	16.5	77.1	6.4	26.9	55.5	1.7	0.4	12	3.5
6073010014	29.49	58.48	55-60%	17679 San Diego	13.4	82.9	3.7	50.6	16.4	11.9	0.3	17.5	3.3
6037405701	29.49	58.47	55-60%	3853 Los Angeles	14.5	78.9	6.6	72.5	14	2.8	0.5	9.3	1
6067008913	29.48	58.46	55-60%	4145 Sacramento	13.2	71.9	14.9	14.4	70.6	5.5	0.5	5.3	3.8
6037900705	29.48	58.44	55-60%	4285 Los Angeles	14	71.5	14.5	25	50	18.4	0.7	2.7	3.2
6095253300	29.45	58.43	55-60%	2743 Solano	12.2	75.2	12.6	43.7	51.6	0.5	0.5	1.9	1.8
6111001206	29.45	58.42	55-60%	941 Ventura	8.8	69.1	22.1	14.3	79.2	0.3	0.4	2.3	3.4
6071007105	29.45	58.41	55-60%	2715 San Bernardino	12.4	77.5	10.1	33.3	38.5	10	0.4	14.7	3.2
6037216402	29.45	58.39	55-60%	2615 Los Angeles	8	71.9	20.1	5.4	77.8	3.2	0.3	6.7	6.7
6067008905	29.43	58.38	55-60%	4451 Sacramento	13.1	71.5	15.4	22.6	59.2	7	1.1	6	4
6037920336	29.40	58.37	55-60%	7027 Los Angeles	19.2	76.4	4.4	74.3	20.2	1.1	0.2	3	1.2
6037109400	29.38	58.36	55-60%	3720 Los Angeles	11.8	74.9	13.3	75	14	2.4	0.5	6.5	1.6
6101050102	29.36	58.34	55-60%	4559 Sutter	16.3	66.1	17.6	34	54.6	2.5	1.3	3.8	3.7
6037212501	29.36	58.33	55-60%	2165 Los Angeles	10.8	84.1	5.1	54	13.1	6	0	24.8	2.2
6065043703	29.36	58.32	55-60%	2585 Riverside	14	66.7	19.3	32.1	60.5	1.8	1.1	1.4	3.1
6059011300	29.35	58.30	55-60%	4379 Orange	8.2	77.2	14.6	20.3	60.6	2.1	0.2	14.1	2.7
6067008909	29.35	58.29	55-60%	2358 Sacramento	13	71.4	15.6	24.5	50.3	9.8	0.4	10.1	4.9
6001436602	29.34	58.28	55-60%	4571 Alameda	16.6	75.9	7.5	44.3	11.1	16.3	0.3	22.2	5.8
6067009105	29.34	58.27	55-60%	2709 Sacramento	12.3	78.4	9.3	19.2	52.1	13.8	0.7	8.3	5.9
6059099227	29.33	58.25	55-60%	5922 Orange	12.4	76	11.6	27.2	30	1.5	0	39.2	2
6027000800	29.31	58.24	55-60%	3378 Inyo	10.9	69.6	19.5	25.4	63.7	0.4	6.7	1.2	2.7
6037115103	29.30	58.23	55-60%	2776 Los Angeles	0.1	99.7	0.2	31.7	26.8	24.2	0.4	12.4	4.6
6073005900	29.29	58.22	55-60%	2821 San Diego	2.9	83.1	14	18.9	69	3.7	0.4	4.8	3.3
6069000802	29.28	58.20	55-60%	2534 San Benito	12.1	75.5	12.4	32.8	64.3	0.2	0.8	0.9	1.1
6001410300	29.28	58.19	55-60%	3536 Alameda	18.8	75.3	5.9	61.8	1.9	28.1	0.4	5.9	1.8
6067008703	29.28	58.18	55-60%	4912 Sacramento	9.9	71.8	18.3	7.4	65	3	0.3	21	3.3
6037480802	29.28	58.17	55-60%	3279 Los Angeles	11.7	72.4	15.9	54.6	8.6	0.6	0.3	35.1	0.8
6031000702	29.27	58.15	55-60%	4382 Kings	14.3	74.7	11	37.4	53.7	3	0.7	2	3.3

6037462302	29.27	58.14	55-60%	2972 Los Angeles	8	82.9	9.1	28.5	32.3	9.2	0.1	25.7	4.1
6037503201	29.27	58.13	55-60%	3912 Los Angeles	12.6	73.6	13.8	66.9	25.7	1.2	0.2	4.4	1.6
6037900703	29.24	58.12	55-60%	4375 Los Angeles	13.3	73.6	13.1	31.9	37.1	20.3	0.5	6.4	3.9
6071011300	29.24	58.10	55-60%	1408 San Bernardino	6.4	69	24.6	10.9	85	0.1	0.4	1.5	2.1
6081600600	29.23	58.09	55-60%	5352 San Mateo	11.5	77.8	10.7	42.8	8.2	2.2	0.1	44.1	2.6
6037550400	29.22	58.08	55-60%	1534 Los Angeles	12.9	76.9	10.2	74.3	17.6	2.2	0.3	5.3	0.3
6067004201	29.22	58.07	55-60%	5290 Sacramento	16.3	70.8	12.9	37	17.3	26.2	0.5	14.5	4.5
6073009201	29.21	58.05	55-60%	5014 San Diego	25.1	68.2	6.7	23.1	39.9	15.3	0.7	14.9	6.2
6037102105	29.20	58.04	55-60%	1731 Los Angeles	11.2	79.2	9.6	65.6	23.9	0.9	0.1	8	1.5
6067009010	29.20	58.03	55-60%	4866 Sacramento	15.1	81.7	3.2	20.6	41.7	13.4	0.4	17.6	6.3
6059086405	29.19	58.01	55-60%	6578 Orange	18.8	75.7	5.5	81.2	12.2	1.6	0.2	3.9	0.9
6059001401	29.18	58.00	55-60%	5013 Orange	14.2	72.9	12.9	57.3	35.7	1.4	0.3	3.8	1.5
6037139402	29.17	57.99	55-60%	2851 Los Angeles	12.5	69.8	17.7	5.2	84.6	1.3	0.2	4.2	4.5
6073003111	29.13	57.98	55-60%	6183 San Diego	16.4	74	9.6	50.2	3.9	21.5	0.1	21.2	3.1
6037117101	29.12	57.96	55-60%	4796 Los Angeles	14.8	78.8	6.4	45.6	10.3	5.2	0.1	37	1.8
6095252702	29.12	57.95	55-60%	6808 Solano	13.8	77.2	9	20.3	30.6	17.7	0.5	24.1	6.8
6073006100	29.10	57.94	55-60%	2237 San Diego	8.2	80.1	11.7	19.2	70.1	2.2	0.4	4.9	3.2
6081600800	29.09	57.93	55-60%	6768 San Mateo	11.6	79.9	8.5	20.7	17.3	6.8	0.1	50.5	4.6
6095252501	29.09	57.91	55-60%	2670 Solano	15.1	71.9	13	42.1	31.9	12.6	0.4	7.3	5.8
6037404100	29.08	57.90	55-60%	6445 Los Angeles	15.7	77.2	7.1	80.7	10.2	2.5	0.1	5.5	1
6037543601	29.08	57.89	55-60%	3910 Los Angeles	11	76.1	12.9	37.2	8.5	5.8	0.2	45.9	2.4
6077005001	29.07	57.88	55-60%	5569 San Joaquin	12.5	70.3	17.2	23.4	71.2	0.8	0.5	2	2
6075025800	29.06	57.86	55-60%	1960 San Francisco	10.2	76.4	13.4	21.8	10.7	8	0.2	56.7	2.7
6111002800	29.02	57.85	55-60%	6270 Ventura	11.8	78.1	10.1	30.6	62.6	1.2	0.6	2.4	2.6
6101050403	29.02	57.84	55-60%	3585 Sutter	19.5	75.5	5	26.1	54.1	2.9	0.6	11.3	4.9
6037124500	29.02	57.83	55-60%	2779 Los Angeles	9.9	77.3	12.8	22.5	63.8	3.5	0.4	6.6	3.3
6085512017	29.01	57.81	55-60%	7804 Santa Clara	15.4	75.9	8.7	46.6	15.9	3	0.3	31.4	2.7
6113010800	29.00	57.80	55-60%	3881 Yolo	15.7	75.1	9.2	56.1	37.8	0.8	0.6	2.7	2.1
6029006004	28.99	57.79	55-60%	1601 Kern	7.3	70.2	22.5	15.6	77.1	0.5	1.3	1.4	4.1
6065042408	28.98	57.78	55-60%	3152 Riverside	15	77.4	7.6	51.8	26.9	12.2	0.5	5.3	3.4
6065941500	28.98	57.76	55-60%	4291 Riverside	15.8	72.8	11.4	29.4	52.8	4.5	8.7	1.9	2.6
6085503337	28.98	57.75	55-60%	3772 Santa Clara	13.4	76.9	9.7	23.1	9	3.7	0.2	61.3	2.6
6037554406	28.97	57.74	55-60%	4875 Los Angeles	11.2	75.5	13.3	26.4	39.1	11.7	0.1	19.1	3.6
6067007423	28.96	57.72	55-60%	5313 Sacramento	21.1	75.6	3.3	37.9	32.8	19.8	0.5	3.8	5.2
6025011201	28.96	57.71	55-60%	6043 Imperial	17.2	75.1	7.7	76.2	19.1	1.3	0.2	2.4	0.9
6037269903	28.93	57.70	55-60%	3650 Los Angeles	7.7	88.1	4.2	29.3	32.1	10.4	0.2	24	4.1
6005000304	28.93	57.69	55-60%	3946 Amador	10.6	74.2	15.2	13.4	80.9	0.2	1.6	1	2.9
6071000103	28.93	57.67	55-60%	4740 San Bernardino	11.9	80.6	7.5	26.7	28.8	6	0.2	35.2	3
6071008901	28.93	57.66	55-60%	2174 San Bernardino	14	69.4	16.6	15.6	73.5	3.1	2.7	1.1	4
6073020214	28.93	57.65	55-60%	5143 San Diego	20	71	9	78.3	15.9	1.7	0.5	2.6	1
6059011101	28.93	57.64	55-60%	4140 Orange	15.5	76.6	7.9	53	33.2	2	0.1	9.5	2.1
6065041702	28.93	57.62	55-60%	4572 Riverside	14.6	75.2	10.2	62.2	31.6	1.9	0.3	2.4	1.6
6037189905	28.91	57.61	55-60%	2304 Los Angeles	4.4	81.8	13.8	9.3	78.7	3.3	0.2	5.3	3.2
6037101210	28.88	57.60	55-60%	5990 Los Angeles	13.6	77.9	8.5	37	48.2	3.1	0.1	7.5	4
6111000304	28.88	57.59	55-60%	4777 Ventura	17.6	74.4	8	79.1	19.3	0.2	0.2	0.4	0.8
6037124400	28.88	57.57	55-60%	4192 Los Angeles	13.9	73.4	12.7	19.6	71.1	3.3	0.2	3.5	2.3
6037403317	28.87	57.56	55-60%	4721 Los Angeles	9.5	80.6	9.9	34.5	25.1	9.3	0.1	28	3
6067009503	28.86	57.55	55-60%	3067 Sacramento	14	69.1	16.9	43.5	50.9	0.8	0.8	1.3	2.8
6073006500	28.85	57.54	55-60%	2569 San Diego	4.3	73.5	22.2	18.6	64	8.3	0.6	5.4	3
6037480804	28.84	57.52	55-60%	4998 Los Angeles	11	79.2	9.8	36.8	9.3	1.4	0	50.7	1.8
6037301203	28.84	57.51	55-60%	4368 Los Angeles	8.8	73	18.2	8.3	69.9	0.9	0.1	17.4	3.5
6037267600	28.82	57.50	55-60%	2549 Los Angeles	7.9	77.4	14.7	23.4	43.5	2.3	0.2	26.2	4.4
6099000911	28.82	57.49	55-60%	4815 Stanislaus	13	78.6	8.4	29	56.7	3.6	0.4	6	4.4
6085503111	28.82	57.47	55-60%	5101 Santa Clara	15.2	76.1	8.7	47.9	5.5	1.5	0.1	43.7	1.3
6029005203	28.82	57.46	55-60%	4679 Kern	8.5	62.9	28.6	7.4	86.3	0.3	2.4	0.5	3.1
6075012402	28.81	57.45	55-60%	3974 San Francisco	5.1	81.4	13.5	19.6	43.3	10.1	0.4	22.6	3.9
6065040813	28.81	57.43	55-60%	6080 Riverside	13.2	77.7	9.1	29	55.8	3	0.4	9.2	2.6
6037123601	28.81	57.42	55-60%	4995 Los Angeles	10.3	76.1	13.6	33.3	55.3	4.1	0.2	4.8	2.4
6095252102	28.78	57.41	55-60%	3874 Solano	12.1	76.6	11.3	16.1	65.2	5.4	0.6	6.8	5.8
6071002307	28.78	57.40	55-60%	5085 San Bernardino	15.4	77.6	7	76.4	11.3	6.9	0.2	3.7	1.5
6037403902	28.78	57.38	55-60%	4806 Los Angeles	10.8	73.1	16.1	41.9	44.1	2.7	0.1	8.6	2.5
6037400603	28.77	57.37	55-60%	5249 Los Angeles	14.2	78.5	7.3	46	29.6	5.4	0.2	16.1	2.6
6037276100	28.77	57.36	55-60%	5592 Los Angeles	9.5	83.1	7.4	14.4	20.1	49.4	0.2	11.3	4.6
6059088702	28.75	57.35	55-60%	6107 Orange	13.7	76.2	10.1	26.7	13.7	0.7	0.1	57.1	1.9
6037480302	28.75	57.33	55-60%	4255 Los Angeles	9	75.8	15.2	34.6	18.8	2.1	0.1	42.1	2.3
6107001005	28.75	57.32	55-60%	2733 Tulare	14.3	71.8	13.9	27.4	63.3	0.5	0.9	5	2.9
6037481711	28.74	57.31	55-60%	4530 Los Angeles	7	74.3	18.7	8.3	3.8	0.4	0	86.7	0.8
6037406412	28.73	57.30	55-60%	2482 Los Angeles	10.1	73.1	16.8	48.3	28.4	3	0.3	18.9	1
6067007601	28.73	57.28	55-60%	6416 Sacramento	11.8	71.1	17.1	13	70.3	5.1	0.8	5.8	5
6111004304	28.72	57.27	55-60%	6760 Ventura	14.9	68.1	17	49.6	37	5.1	0.4	5.1	2.9
6077003214	28.71	57.26	55-60%	3054 San Joaquin	11.8	78.6	9.6	27.2	43.9	6.8	0.4	16.9	4.7
6077004600	28.71	57.25	55-60%	5892 San Joaquin	12.2	70.5	17.3	27.9	65.7	0.6	0.7	3	2.2
6037310900	28.70	57.23	55-60%	6870 Los Angeles	10.8	75.8	13.4	31.9	52.8	1.5	0.3	11	2.6
6095252317	28.68	57.22	55-60%	6823 Solano	15.4	78.8	5.8	16.1	29.2	15.9	0.3	30.1	8.4
6037106403	28.68	57.21	55-60%	3825 Los Angeles	15	77.6	7.4	88.9	7.7	1.2	0.1	1.3	0.8
6037131900	28.68	57.20	55-60%	4210 Los Angeles	11.7	78.7	9.6	48.6	36.8	2.9	0.3	9.1	2.3
6037401311	28.66	57.18	55-60%	6521 Los Angeles	11.2	77.6	11.2	35.4	49.3	4.7	0.5	7.3	2.9
6047001101	28.65	57.17	55-60%	5880 Merced	14.7	74	11.3	34.5	48.9	4.3	0.7	8.3	3.2
6077003108	28.65	57.16	55-60%	4450 San Joaquin	15.5	74.8	9.7	29.3	45.8	10.5	0.4	9	5
6037463102	28.64	57.14	55-60%	3779 Los Angeles	11.8	71.3	16.9	34.9	33.6	2.1	0.1	26.6	2.8
6037900507	28.64	57.13	55-60%	7669 Los Angeles	18.8	74.5	6.7	45.3	26.5	21.8	0.3	3.1	3.2
6067001700	28.62	57.12	55-60%	4794 Sacramento	8	74.1	17.9	15.1	64.9	6.1	0.4	8.5	5
6037311000	28.62	57.11	55-60%	3755 Los Angeles	10.6	78.3	11.1	32.2	51.2	1.8	0.2	12	2.6
6065043702	28.61	57.09	55-60%	4235 Riverside	12	68.9	19.1	27.7	64.3	1.9	1.1	2.3	2.7
6037197410	28.61	57.08	55-60%	3704 Los Angeles	9.4	79.1	11.5	37.8	46.2	2.1	0.2	10.4	3.2
6071010015	28.59	57.07	55-60%	5434 San Bernardino	15.1	74.7	10.2	52.6	40.4	3.4	0.3	1.5	1.8
6037408005	28.59	57.06	55-60%	5088 Los Angeles	11.5	75.2	13.3	37.5	20.2	4.6	0.1	34.8	2.8
6037651001	28.59	57.04	55-60%	5522 Los Angeles	11.3	73.2	15.5	23.3	41.4	2.7	0.2	28	4.4
6073011902	28.57	57.03	55-60%	5246 San Diego	11.8	71.3	16.9	55.9	10.4	5.1	0.2	25.9	2.6
6037555104	28.55	57.02	55-60%	4239 Los Angeles	13.4	76.8	9.8	46.4	17.6	5	0.3	29	1.8
6065043509	28.54	57.01	55-60%	5117 Riverside	16.6	70.7	12.7	50.9	40.1	4.3	0.7	2.1	2
6067008129	28.52	56.99	55-60%	3358 Sacramento	13.5	72	14.5	19.1	69.4	3.2	0.7	3.1	4.5
6075980501	28.51	56.98	55-60%	797 San Francisco	9.4	60.6	30	19.1	4.8	11.9	0	62.1	2.1
6073002202	28.51	56.97	55-60%	4859 San Diego	16.9	72.7	10.4	61.2	8.1	6.7	0.3	22.1	1.6
6065051300	28.50	56.96	55-60%	8371 Riverside	14.1	67	18.9	38.4	50.2	5.1	0.5	3.2	2.6
6073013312	28.50	56.94	55-60%	2853 San Diego	16.2	74.7	9.1	69.8	17.6	2.8	0.2	6	3.6
6001440333	28.50	56.93	55-60%	2839 Alameda	10.4	79.7	9.9	7.9	9.7	5.6	0	72.3	4.5
6059099410	28.49	56.92	55-60%	4101 Orange	12.3	78.2	9.5	26.7	48.2	2	0.3	18.4	4.3
6077005004	28.48	56.91	55-60%	5702 San Joaquin	14.5	77	8.5	23	68.3	1.8	0.3	3.3	3.3
6071010804	28.48	56.89	55-60%	2947 San Bernardino	9.7	77.3	13	17.7	75.6	1	1.2	0.9	3.7
6037117102	28.47	56.88	55-60%	2631 Los Angeles	11.8	77.2	11	58.7	21.7	4.2	0.1	13.4	1.9
6067009618	28.47	56.87	55-60%	4642 Sacramento	14.6	78	7.4	22.8	30.8	13.7	0.3	25.8	6.6
6013336101	28.46	56.85	55-60%	4802 Contra Costa	19.4	77.3	3.3	69.7	13.1	6.9	0.2	7.7	2.4
6059088701	28.46	56.84	55-60%	6067 Orange	15.4	74.6	10	34.2	17.6	1.4	0.2	44.5	2.1
6059075805	28.46	56.83	55-60%	4213 Orange	14.2	77.8	8	48.9	43.7	0.9	0.2	4.7	1.5
6037553300	28.45	56.82	55-60%	3390 Los Angeles	12.2	76.3	11.5	59.2	19.8	6.7	0.2	12.5	1.6
6085504410	28.43	56.80	55-60%	4431 Santa Clara	13.5	74.8	11.7	21.5	12.8	3.2	0.2	60	2.3
6083002404	28.40	56.79	55-60%	7800 Santa Barbara	23.7	72.6	3.7	89.5	6	0.6	0.2	2.9	0.7
6001437600	28.39	56.78	55-60%	3217 Alameda	13.9	68	18.1	43.6	17.8	8.6	0.3	25.5	4.2
6037405400	28.38	56.77	55-60%	4795 Los Angeles	14.1	75.6	10.3	71.7	17.2	2.4	0	7.3	1.4
6037650605	28.37	56.75	55-60%	2763 Los Angeles	11.8	76.9	11.3	8.8	34.2	3.7	0.1	49	4.2
6085504001	28.36	56.74	55-60%	6017 Santa Clara	17.8	75	7.2	71.4	6.7	2	0.2	18.2	1.5
6103001000	28.34	56.73	55-60%	7175 Tehama	15	70.9	14.1	35.1	60.1	0.4	1.6	0.8	2
6001438300	28.34	56.72	55-60%	3731 Alameda	13.8	75.4	10.8	44.3	8.4	7.1	0.2	35.1	4.9
6037111400	28.33	56.70	55-60%	7560 Los Angeles	11	74.2	14.8	32.1	41.3	3.3	0.1	20.5	2.7
6107001502	28.33	56.69	55-60%	5918 Tulare	17.2	72.1	10.7	49.2	47	0.6	0.7	1.1	1.4
6029003303	28.32	56.68	55-60%	1471 Kern	11.9	77	11.1	18.6	76.1	0.1	1.7	1.3	2.2
6067008911	28.32	56.67	55-60%	2295 Sacramento	19.5	72	8.5	31.9	37.5	18.7	0.6	5.4	6
6037135102	28.31	56.65	55-60%	3513 Los Angeles	9.7	72	18.3	17.5	64.3	3.4	0.2	10.6	3.9
6107002007	28.30	56.64	55-60%	8185 Tulare	17.1	70.8	12.1	37.6	51.3	1.5	0.8	6.4	2.4
6065046404	28.29	56.63	55-60%	5590 Riverside	17.8	75.1	7.1	42.2	45.1	4.6	0.9	4.6	2.6
6071009906	28.29	56.61	55-60%	4941 San Bernardino	15.2	76.8	8	45.7	31.9	15.3	0.3	3.8	3
6099000907	28.28	56.60	55-60%	3200 Stanislaus	10.2	67.7	22.1	17.4	74.9	1.1	0.7	2.5	3.3

6029005506	28.26	56.59	55-60%	5998 Kern	12.7	75.9	11.4	30.4	59.5	3.4	1	2.4	3.3
6037403801	28.26	56.58	55-60%	6212 Los Angeles	12.6	79	8.4	50.1	28.3	4.3	0.3	14.9	2
6059099242	28.26	56.56	55-60%	3584 Orange	13.2	75.8	11	31.5	44.8	0.9	0.3	19.4	3.2
6111000600	28.25	56.55	55-60%	6141 Ventura	19.5	72.3	8.2	89.4	8.6	0.4	0.3	0.7	0.6
6037106603	28.24	56.54	55-60%	2979 Los Angeles	9.2	74.7	16.1	15.9	55.8	3.2	0.2	20	4.8
6081601601	28.24	56.53	55-60%	2893 San Mateo	10.2	74	15.8	33.8	26.3	2.4	0.1	33.6	3.9
6085512401	28.24	56.51	55-60%	4782 Santa Clara	12.5	74.6	12.9	43.1	47.7	0.6	0.4	6.1	2
6059087105	28.23	56.50	55-60%	4635 Orange	13.8	73.8	12.4	46.9	25.9	2.9	0.5	21.8	2
6071010017	28.22	56.49	55-60%	14798 San Bernardino	17	76.5	6.5	44.9	42.5	6.3	0.5	3.9	1.9
6073002710	28.21	56.48	55-60%	4228 San Diego	19.3	73.6	7.1	38.2	7.8	23.2	0.3	28.2	2.4
6001433102	28.21	56.46	55-60%	3989 Alameda	11.5	75.8	12.7	28.6	21.9	9	0.1	37.9	2.6
6023010901	28.20	56.45	55-60%	4533 Humboldt	15.2	66.3	18.5	21.8	70.7	0.3	2.5	1.4	3.3
6073010015	28.20	56.44	55-60%	2803 San Diego	17.2	76.7	6.1	82.9	4.9	2.4	0.2	7.9	1.7
6001433600	28.20	56.43	55-60%	5978 Alameda	11.9	74.6	13.5	23.3	25.5	9.1	0.1	38.8	3.1
6037206020	28.18	56.41	55-60%	7883 Los Angeles	0.1	98.7	1.2	38.3	20.5	36.5	0.1	3.8	0.9
6037403600	28.18	56.40	55-60%	6672 Los Angeles	10.8	73.2	16	44.1	37.5	3.3	0.3	13	1.9
6075011700	28.18	56.39	55-60%	1783 San Francisco	4.2	80.9	14.9	9.6	34.7	5.9	0.5	46.6	2.8
6085503703	28.18	56.38	55-60%	4271 Santa Clara	17.3	76.5	6.2	73.4	1.8	2.1	0.2	22	0.6
6037920030	28.17	56.36	55-60%	5818 Los Angeles	15	81.1	3.9	31.2	49.1	5	0.1	10.6	4
6115040700	28.17	56.35	55-60%	10879 Yuba	21.4	73.6	5	25.4	55.5	4.8	0.9	8.5	4.9
6085504802	28.16	56.34	55-60%	5242 Santa Clara	12.4	76.2	11.4	25	26.4	1.6	0.5	42.6	3.8
6077005403	28.16	56.32	55-60%	5875 San Joaquin	14.6	79.1	6.3	35.7	45.1	6.9	0.3	8	3.9
6065045704	28.16	56.31	55-60%	2804 Riverside	18.8	71.7	9.5	98.3	1.1	0.1	0.3	0	0.1
6001437500	28.15	56.30	55-60%	4528 Alameda	19.6	73.1	7.3	59.7	10.9	8.2	0.2	17.2	3.7
6071002034	28.15	56.29	55-60%	13758 San Bernardino	15.2	80	4.8	33.9	31.9	10.9	0.2	19.8	3.3
6073015301	28.14	56.27	55-60%	3179 San Diego	15.7	75.1	9.2	30.5	53.9	4.2	0.7	6.3	4.3
6077005208	28.14	56.26	55-60%	5784 San Joaquin	14	80.1	5.9	29.9	46.4	6.7	0.6	11.8	4.6
6037271901	28.14	56.25	55-60%	3087 Los Angeles	10.4	79.3	10.3	28.2	44.2	7.1	0.1	16.7	3.8
6059076205	28.13	56.24	55-60%	6847 Orange	8.9	82.2	8.9	35.1	53.6	1.2	0.4	6.9	2.8
6037111201	28.13	56.22	55-60%	3410 Los Angeles	9.3	74.7	16	29.2	49.9	2.7	0.1	14.7	3.3
6037400304	28.12	56.21	55-60%	6714 Los Angeles	11.1	76.1	12.8	33.1	51.9	3.1	0.3	8.8	2.8
6083002403	28.12	56.20	55-60%	6811 Santa Barbara	23	72.9	4.1	91.7	5.1	0.6	0.4	1.3	0.9
6065040611	28.12	56.19	55-60%	7640 Riverside	19.7	76.3	4	37.9	24	8.9	0.2	26.2	2.9
6067002900	28.11	56.17	55-60%	4499 Sacramento	11.2	75.4	13.4	23.9	59.7	4.7	0.6	6.5	4.7
6067009320	28.11	56.16	55-60%	4336 Sacramento	17.1	73.4	9.5	25.7	21.2	16.5	0.4	31.3	4.9
6029000903	28.11	56.15	55-60%	3653 Kern	14.5	68.4	17.1	44.6	46.9	3.7	1.2	1.5	2.1
6037900606	28.11	56.14	55-60%	3721 Los Angeles	19.1	74	6.9	42.1	23.4	30	0.7	1.3	2.5
6029000904	28.11	56.12	55-60%	4008 Kern	15.4	70.6	14	55.7	36.2	2.9	0.5	3	1.6
6037141303	28.10	56.11	55-60%	3089 Los Angeles	8.2	78.6	13.2	13.3	70	5.6	0.1	7.7	3.4
6065040604	28.10	56.10	55-60%	5541 Riverside	13.1	79.1	7.8	50.9	43.2	1.2	0.6	1.6	2.5
6037195902	28.10	56.09	55-60%	1905 Los Angeles	6.6	84.9	8.5	30.7	48.9	2.4	0.2	14.2	3.6
6037109700	28.10	56.07	55-60%	4493 Los Angeles	12.1	74.7	13.2	42.1	35.3	2.7	0.3	16.9	2.7
6065040302	28.09	56.06	55-60%	7308 Riverside	12.9	78.3	8.8	48.8	38.6	5	0.4	5.2	2.1
6059074006	28.08	56.05	55-60%	5555 Orange	15.5	80.4	4.1	66.9	16.9	2.6	0	12.2	1.4
6059075003	28.08	56.03	55-60%	7408 Orange	24.7	73.6	1.7	95.6	3.2	0.4	0.2	0.3	0.4
6097151402	28.07	56.02	55-60%	9177 Sonoma	17	75.1	7.9	49.4	38.9	2.5	1.1	5.1	2.9
6077003203	28.05	56.01	55-60%	3519 San Joaquin	11.1	69	19.9	21.6	63.3	5.3	0.8	5.6	3.4
6071007410	28.05	56.00	55-60%	5519 San Bernardino	16.9	67.8	15.3	40.5	31.8	18	0.4	6	3.3
6073004501	28.04	55.98	55-60%	2875 San Diego	10.7	84.9	4.4	50.6	40.6	3.4	0.2	3	2.1
6059075512	28.04	55.97	55-60%	3548 Orange	15.4	78	6.6	57.4	19.8	2.1	0.2	18.2	2.4
6037910201	28.04	55.96	55-60%	3549 Los Angeles	14.1	73.1	12.8	47.7	35.1	10.6	0.5	3.7	2.3
6085500901	28.03	55.95	55-60%	3723 Santa Clara	4.7	87.3	8	19.7	36.8	6.5	0.3	33.5	3.3
6059076102	28.02	55.93	55-60%	7487 Orange	7.7	83.4	8.9	50.6	25.2	4.4	0.2	18.4	1.2
6031000601	28.02	55.92	55-60%	10021 Kings	19.3	74.1	6.6	33.1	50.5	3.9	0.5	8.5	3.5
6059110003	28.02	55.91	55-60%	3194 Orange	11	72.2	16.8	17.4	65.3	0.8	0.2	12.6	3.6
6073008800	27.99	55.90	55-60%	6188 San Diego	13.6	75.2	11.2	29.1	17.5	7.3	0.1	43.1	2.9
6073010107	27.99	55.88	55-60%	6498 San Diego	13.5	75.8	10.7	72.1	12.4	2.7	0.1	10.7	1.9
6085503508	27.98	55.87	55-60%	6219 Santa Clara	17	75.5	7.5	75.1	6.1	1.6	0.3	15.7	1.2
6077003208	27.98	55.86	55-60%	12534 San Joaquin	16.1	74.9	9	23.1	29.3	9	0.2	34.7	3.7
6071011401	27.97	55.85	55-60%	4394 San Bernardino	13.4	73.8	12.8	27.3	67.5	0.7	0.9	1.1	2.6
6059110010	27.96	55.83	55-60%	4526 Orange	10.7	74.8	14.5	16.3	54.9	1.2	0.2	24.2	3.1
6059063904	27.95	55.82	55-60%	4658 Orange	13.7	74.2	12.1	44.4	40	0.9	0.2	12.7	1.7
6071012001	27.95	55.81	55-60%	5612 San Bernardino	16.1	72.8	11.1	38.2	36.1	13	0.7	8	4
6067009103	27.94	55.80	55-60%	3495 Sacramento	12.9	78.5	8.6	17.3	52	12.9	0.8	10.8	6.3
6065044103	27.92	55.78	55-60%	5669 Riverside	11.8	61.8	26.4	33.9	51	4.9	1.4	6.1	2.7
6037272301	27.91	55.77	55-60%	2941 Los Angeles	8.9	77.7	13.4	31	48.4	4.9	0.1	11.9	3.8
6111005003	27.90	55.76	55-60%	8366 Ventura	17.4	74.2	8.4	87.4	9.5	0.8	0.4	1.2	0.7
6053014107	27.90	55.74	55-60%	7088 Monterey	23.5	73.7	2.8	18.5	57.5	6.2	0.3	10.7	6.9
6061020908	27.90	55.73	55-60%	6706 Placer	14	76.5	9.5	29.1	61.5	1.5	0.6	4.4	2.8
6059099509	27.90	55.72	55-60%	3491 Orange	0.2	17.4	82.4	5.8	81.8	0.6	0.1	11	0.7
6001438201	27.89	55.71	55-60%	4540 Alameda	13.2	76.3	10.5	51.5	16.3	6	0.5	22.4	3.4
6037125502	27.88	55.69	55-60%	3083 Los Angeles	6.1	87.4	6.5	16	63.3	7.9	0.3	8.3	4.2
6073020021	27.88	55.68	55-60%	6423 San Diego	19.3	77	3.7	61	21.8	2.2	0.2	11.7	3.1
6073003208	27.87	55.67	55-60%	6619 San Diego	14	77.8	8.2	31.9	10.3	16.7	0.1	36.7	4.3
6065042731	27.87	55.66	55-60%	5768 Riverside	17.3	68.4	14.3	54.9	32.5	6.9	0.3	3.5	1.9
6059001902	27.86	55.64	55-60%	2967 Orange	11.8	78	10.2	44	37.4	1.6	0.1	14.6	2.3
6081610203	27.86	55.63	55-60%	3436 San Mateo	18.5	77.6	3.9	84.2	9.1	1.9	0.1	3.3	1.4
6065043508	27.86	55.62	55-60%	7014 Riverside	14.6	68.7	16.7	36.1	53.9	4.2	1.2	1.9	2.7
6057000502	27.84	55.61	55-60%	4664 Nevada	10.9	69.8	19.3	8.4	85.9	0.2	1.2	1.7	2.7
6037405800	27.84	55.59	55-60%	5881 Los Angeles	14.4	76.3	9.3	65.7	19.5	3.5	0.4	8.9	2
6065043601	27.84	55.58	55-60%	4505 Riverside	17.7	73.7	8.6	66	25.1	4.2	1.5	1.1	2.1
6071009110	27.82	55.57	55-60%	15578 San Bernardino	20.2	74.5	5.3	48.9	23	18.7	0.4	5.3	3.7
6073018504	27.82	55.56	55-60%	6631 San Diego	11.4	74.5	14.1	20	67.4	3.6	0.4	4.8	3.7
6013304002	27.82	55.54	55-60%	1426 Contra Costa	13.8	76	10.2	38.9	52.7	4.6	0.4	1.1	2.5
6037501802	27.81	55.53	55-60%	3326 Los Angeles	13.6	74.6	11.8	63.6	30.9	1.1	0.3	2.7	1.4
6073002401	27.81	55.52	55-60%	4573 San Diego	16.6	78.5	4.9	60.6	17.5	10.9	0.4	8	2.6
6037601301	27.80	55.51	55-60%	1915 Los Angeles	10.2	77.2	12.6	19.6	14.4	57.8	0.2	3.7	4.2
6019005701	27.79	55.49	55-60%	3697 Fresno	14.5	74	11.5	32.1	56.2	1.8	1.9	4.9	3
6085505203	27.78	55.48	55-60%	4809 Santa Clara	7.6	89.4	3	21.1	49.8	3.1	0.1	20.8	5.1
6019005405	27.78	55.47	55-60%	4145 Fresno	10	68.3	21.7	27	57.8	4.4	0.7	7.5	2.6
6065042741	27.77	55.45	55-60%	2142 Riverside	0.2	27.5	72.3	10.5	78.6	6.6	0.7	1.7	1.9
6097151401	27.77	55.44	55-60%	7306 Sonoma	18.2	76.9	4.9	51	35.4	2.8	0.9	7	2.9
6059088107	27.76	55.43	55-60%	5866 Orange	12.5	74.8	12.7	24	17.7	0.9	0.2	54.9	2.3
6019004210	27.75	55.42	55-60%	3480 Fresno	15.4	79.1	5.5	34.5	44.1	7.2	0.7	10.1	3.6
6073021100	27.75	55.40	55-60%	7589 San Diego	12.4	74.3	13.3	35.3	54.5	2.3	4.1	1.1	2.7
6001423100	27.74	55.39	55-60%	3964 Alameda	9.6	75.3	15.1	16.2	47.8	17.5	0.4	13.3	4.9
6037119341	27.74	55.38	55-60%	2719 Los Angeles	12.1	78.9	9	54.6	9.6	3.5	0	30.4	1.9
6067007402	27.73	55.37	55-60%	6180 Sacramento	14.5	72.3	13.2	26.6	55.8	7	0.7	5	4.9
6001440308	27.73	55.35	55-60%	5883 Alameda	11.2	71.4	17.4	32.3	15.4	4.9	0.2	42.9	4.4
6037192410	27.73	55.34	55-60%	3628 Los Angeles	9.6	79.1	11.3	25	45.3	3.2	0.1	23.4	3
6111005205	27.73	55.33	55-60%	5767 Ventura	9.1	69.5	21.4	16.9	70.1	1.3	0.2	9	2.5
6037143604	27.72	55.32	55-60%	3205 Los Angeles	4.5	89.2	6.3	12.9	61.3	9.2	0.4	11.9	4.4
6071007904	27.72	55.30	55-60%	6697 San Bernardino	15	78.8	6.2	31.9	49.3	6.1	0.3	9.4	3
6025012302	27.72	55.29	55-60%	4756 Imperial	17.4	68.3	14.3	65.7	28.7	1.7	1.2	1.1	1.6
6001440307	27.71	55.28	55-60%	4219 Alameda	9.2	70.4	20.4	20.8	25.7	7	0.2	41.9	4.5
6099003905	27.71	55.27	55-60%	3871 Stanislaus	12.1	71.4	16.5	15.9	79.2	0.6	0.5	1.5	2.4
6073013802	27.70	55.25	55-60%	2957 San Diego	16.8	75.7	7.5	48.4	27.9	12.6	0.4	6.8	3.9
6067000400	27.68	55.24	55-60%	3667 Sacramento	5.4	87.6	7	19.9	67.6	3.9	0.8	3.5	4.2
6073020029	27.68	55.23	55-60%	4819 San Diego	15.3	67.2	17.5	62.5	28.7	1.4	0.8	5	1.5
6065043513	27.68	55.22	55-60%	2456 Riverside	15.4	67	17.6	46.1	42.1	6.5	1.1	2	2.2
6073002709	27.67	55.20	55-60%	3945 San Diego	20.3	75.2	4.5	52.6	9.8	18.4	0.5	16.6	2.2
6037900501	27.67	55.19	55-60%	6764 Los Angeles	17.7	74.4	7.9	43.3	26.8	23.7	0.5	2.9	2.8
6073013907	27.66	55.18	55-60%	4185 San Diego	19.7	73.6	6.7	60.7	15.8	13.1	0.3	6.5	3.7
6099000101	27.65	55.16	55-60%	4928 Stanislaus	10.8	73.1	16.1	16.1	79.3	0.4	0.5	1.2	2.4
6039000102	27.64	55.15	55-60%	4163 Madera	9.6	66.2	24.2	10.2	75.9	0.5	8.7	0.9	3.9
6071010016	27.63	55.14	55-60%	5584 San Bernardino	18.2	75.4	6.4	58	31.8	6	0.6	2.1	1.5
6037576801	27.63	55.13	55-60%	4325 Los Angeles	9.9	81.8	8.3	36.1	41.9	11	0.5	7.5	2.9
6089012301	27.63	55.11	55-60%	2578 Shasta	12	70.4	17.6	15.2	76.8	0.5	2.8	1.5	3.3
6095251400	27.62	55.10	55-60%	5357 Solano	11.9	74.2	13.9	21.9	42.2	15.2	0.5	14.1	6.1
6059088201	27.62	55.09	55-60%	4022 Orange	15.1	72.7	12.2	40.1	28.6	1.4	0.2	28	1.7
6073002201	27.61	55.08	55-60%	3796 San Diego	18.8	77.8	3.4	61.4	8	17.7	0.1	10.9	2
6037501503	27.61	55.06	55-60%	5016 Los Angeles	14.3	78.9	6.8	68.4	25.2	1.4	0.4	3	1.6
6045011300	27.61	55.05	55-60%	5972 Mendocino	15.2	73.3	11.5	34.4	56.5	0.7	4.1	1.8	2.6

6001443002	27.61	55.04	55-60%	5918 Alameda	12.4	78.2	9.4	23.1	29.2	2.7	0.3	41	3.6
6067001400	27.60	55.03	55-60%	2466 Sacramento	3.1	82.1	14.8	13.7	71.2	5.4	0.7	4.4	4.7
6037297602	27.60	55.01	55-60%	3503 Los Angeles	10.3	77.1	12.6	32.3	53.4	5.9	0.7	4.5	3.3
6065044404	27.59	55.00	55-60%	1860 Riverside	8.8	74.6	16.6	11.6	77.5	0.8	0.4	6.3	3.3
6001406300	27.59	54.99	50-55%	4113 Alameda	15	75.4	9.6	38.3	6.2	18.2	0.1	34.7	2.6
6037216401	27.58	54.98	50-55%	4189 Los Angeles	9.3	75.8	14.9	7.7	73.5	4.6	0.4	7.8	6
6013374000	27.58	54.96	50-55%	4506 Contra Costa	14.1	75.6	10.3	50.3	19.1	18.8	0.3	8.3	3.2
6037900607	27.57	54.95	50-55%	3904 Los Angeles	18.3	74.4	7.3	44.6	25.1	23.9	0.8	2.1	3.6
6085503118	27.56	54.94	50-55%	5474 Santa Clara	17.3	78.2	4.5	54.8	7.6	2.8	0.5	32.6	1.8
6001444602	27.55	54.92	50-55%	4014 Alameda	15	77.3	7.7	13.3	23.2	7.3	0.1	51.5	4.6
6023010800	27.55	54.91	50-55%	4785 Humboldt	13.2	73.6	13.2	13.8	75.9	0.9	4.7	0.9	3.8
6037406601	27.55	54.90	50-55%	5269 Los Angeles	12.1	74.2	13.7	57.8	19.2	4.4	0.1	16.6	1.9
6071009112	27.53	54.89	50-55%	8744 San Bernardino	19.9	75.4	4.7	57.4	17.2	19	0.3	3.2	2.8
6067009900	27.53	54.87	50-55%	3976 Sacramento	13.3	71.6	15.1	46.9	44.4	0.7	0.7	5	2.2
6019004602	27.52	54.86	50-55%	2555 Fresno	11.3	70.4	18.3	19.5	72	1.6	0.4	4.3	2.2
6071011002	27.51	54.85	50-55%	1673 San Bernardino	11	72.2	16.8	21.5	66.8	3.6	3.1	2	3
6053014000	27.49	54.84	50-55%	2637 Monterey	15.2	76.9	7.9	51.6	33.3	2.8	0.3	8.6	3.4
6037269904	27.49	54.82	50-55%	3902 Los Angeles	6.2	86.6	7.2	21.6	40.8	11.3	0.2	21.6	4.5
6075061100	27.49	54.81	50-55%	4307 San Francisco	6.7	61.5	31.8	2.1	4.7	2.5	0	89.9	0.7
6067006004	27.48	54.80	50-55%	2319 Sacramento	10	66.7	23.3	9	79.4	3.3	0.6	4.6	3.1
6097152802	27.48	54.79	50-55%	6807 Sonoma	16.4	73.7	9.9	43.3	42.4	3.5	1.5	5.9	3.6
6073013906	27.47	54.77	50-55%	4701 San Diego	15.3	74.1	10.6	41.5	31.3	14.4	0.2	7.7	4.9
6081602000	27.47	54.76	50-55%	7649 San Mateo	11.7	75.4	12.9	35	24.5	1.2	0.2	35.5	3.6
6011000100	27.47	54.75	50-55%	5183 Colusa	17.2	73.1	9.7	60.2	35.8	0.3	1	0.9	1.8
6101050701	27.46	54.74	50-55%	4358 Sutter	15.8	71.4	12.8	43.5	43.3	0.5	1.1	9.9	1.7
6067009111	27.45	54.72	50-55%	5539 Sacramento	13.6	78.9	7.5	22.3	46.6	10.8	1	12.6	6.7
6037141304	27.44	54.71	50-55%	2738 Los Angeles	10.2	74.2	15.6	8.6	76.7	4.1	0.1	6.5	3.9
6001433800	27.43	54.70	50-55%	7369 Alameda	13.5	77.1	9.4	35.4	16.6	15.5	0.5	29	3
6065046602	27.43	54.69	50-55%	3712 Riverside	10.6	77.8	11.6	31.2	63.6	1	0.2	1.8	2.1
6037431900	27.43	54.67	50-55%	3828 Los Angeles	10.6	76.8	12.6	16.4	23.6	0.8	0.1	57.4	1.6
6053011204	27.41	54.66	50-55%	3190 Monterey	19.4	75.9	4.7	89.3	8.7	0.6	0.1	0.3	1
6037106642	27.40	54.65	50-55%	3236 Los Angeles	10.5	72.8	16.7	22.3	58.6	3.5	0.1	12.6	2.8
6037111302	27.39	54.63	50-55%	4786 Los Angeles	8.4	72.5	19.1	21.4	50.2	5.8	0.2	19.2	3.3
6037134306	27.38	54.62	50-55%	3498 Los Angeles	15.2	75.7	9.1	44.5	26.6	8.2	0.5	17.5	2.7
6001409800	27.38	54.61	50-55%	2887 Alameda	13.2	72	14.8	12.7	13.6	65.3	0.1	4.6	3.7
6089012102	27.36	54.60	50-55%	1916 Shasta	14	63.5	22.5	9.3	82.5	0.6	2.2	1.6	3.8
6001436601	27.36	54.58	50-55%	6091 Alameda	17	75.6	7.4	57.5	13.7	12	0.3	13.4	3.1
6067008133	27.36	54.57	50-55%	2652 Sacramento	14.2	75.5	10.3	15.8	65	9.8	0.7	4.1	4.6
6059099229	27.35	54.56	50-55%	6312 Orange	9.4	69.4	21.2	15.2	50	1.1	0.1	30.3	3.2
6073003115	27.35	54.55	50-55%	6454 San Diego	14.2	73.6	12.2	31.7	8.1	13.1	0.2	43.5	3.4
6037920034	27.34	54.53	50-55%	3628 Los Angeles	14.3	78.8	6.9	29.6	52.4	4.9	0.3	9.4	3.4
6037401800	27.34	54.52	50-55%	7378 Los Angeles	9.4	73.1	17.5	18.2	60.1	3.6	0.2	14.4	3.5
6001405500	27.34	54.51	50-55%	3643 Alameda	10.3	80.1	9.6	12.3	15.8	20.2	0.3	47.2	4.2
6037139503	27.33	54.50	50-55%	4657 Los Angeles	7.2	71.2	21.6	11.5	73.4	3.7	0.1	5.6	5.6
6067007415	27.33	54.48	50-55%	3039 Sacramento	10.8	72.5	16.7	17.9	62.3	9.7	0.5	4.1	5.5
6071010009	27.32	54.47	50-55%	3511 San Bernardino	13.9	76.8	9.3	43.8	43.5	6.5	0.7	3.1	2.4
6037300902	27.32	54.46	50-55%	1998 Los Angeles	10.8	70.1	19.1	12.6	66.6	0.7	0.1	16.2	4
6073002712	27.31	54.45	50-55%	4652 San Diego	15.7	71	13.3	33.5	17.2	30.5	0.1	15.9	2.9
6029003600	27.29	54.43	50-55%	4531 Kern	17.5	74.4	8.1	31.7	64.1	0.4	1.1	0.6	2.1
6037272202	27.29	54.42	50-55%	3378 Los Angeles	9.8	83.8	6.4	43.4	39.2	3.9	0.4	9.3	3.8
6101051000	27.29	54.41	50-55%	2461 Sutter	12.7	72.4	14.9	34.2	52.4	0.7	0.8	9.1	2.9
6037183401	27.29	54.40	50-55%	2543 Los Angeles	11.7	77.8	10.5	61.5	15.7	1.3	0.4	19.2	1.9
6037554517	27.28	54.38	50-55%	4883 Los Angeles	10	76.4	13.6	9.6	12.3	4	0.1	70.8	3.2
6053010505	27.28	54.37	50-55%	4892 Monterey	16.6	75.2	8.2	69	21.9	1.9	0.6	4.6	1.9
6037211704	27.28	54.36	50-55%	3016 Los Angeles	6.6	77.8	15.6	20.4	14.2	5.6	0	57.8	2
6001433104	27.27	54.34	50-55%	3760 Alameda	12.9	77.8	9.3	33.1	25.4	23	0.5	14.4	3.7
6007003600	27.26	54.33	50-55%	3404 Butte	13.9	73.2	12.9	24.9	68.8	0.7	1.6	1.5	2.5
6059088403	27.25	54.32	50-55%	6896 Orange	14.4	78.8	6.8	55.4	17.4	2.7	0.2	22.2	2.1
6069000200	27.24	54.31	50-55%	6051 San Benito	13.1	74.2	12.7	40.8	52	0.8	0.7	2.9	2.7
6107002004	27.23	54.29	50-55%	4910 Tulare	13.3	71.3	15.4	41.4	50.5	1.6	0.5	4.1	1.9
6025011801	27.22	54.28	50-55%	3821 Imperial	12.5	78.7	8.8	65.2	29.3	0.9	0.2	3.3	1
6001407000	27.21	54.27	50-55%	5885 Alameda	13.3	76.8	9.9	26.3	11.9	25.3	0.6	32.4	3.5
6059075404	27.20	54.26	50-55%	6347 Orange	14.1	74.5	11.4	63	26.2	1.6	0.3	7.2	1.6
6029000905	27.19	54.24	50-55%	2483 Kern	16.7	73.8	9.5	65.2	30.1	1.6	0.7	1.2	1.1
6037701602	27.18	54.23	50-55%	4037 Los Angeles	9	77.5	13.5	13.2	67.6	3.9	0.1	10.3	4.8
6001407101	27.18	54.22	50-55%	3414 Alameda	17	76	7	56.1	6.6	15.1	0.3	19.2	2.6
6037119201	27.17	54.21	50-55%	4137 Los Angeles	14.2	77.9	7.9	86.4	6.4	1.1	0.2	5.3	0.6
6071007903	27.16	54.19	50-55%	4365 San Bernardino	11.8	80.4	7.8	28	49.4	7.6	0.4	11.5	3
6055200201	27.14	54.18	50-55%	3466 Napa	14.8	74.6	10.6	41.9	54.2	0.5	0.4	1.4	1.6
6019005407	27.14	54.17	50-55%	3139 Fresno	10.7	73.2	16.1	21.9	62.2	2.3	0.8	10.2	2.6
6037137201	27.13	54.16	50-55%	5270 Los Angeles	11.2	74.9	13.9	13.7	64	5.3	0.2	12.4	4.4
6071010022	27.13	54.14	50-55%	4084 San Bernardino	13.6	72.5	13.9	33.7	58.5	3.1	0.7	1.6	2.4
6037102103	27.13	54.13	50-55%	1740 Los Angeles	8.8	75.2	16	21.6	64	1.2	0.2	9.7	3.3
6037101220	27.12	54.12	50-55%	3363 Los Angeles	11.5	76.9	11.6	37.8	49.4	1.1	0.3	8.1	3.2
6067005201	27.11	54.11	50-55%	3040 Sacramento	4.8	94.3	0.9	30.4	38.4	11.9	0.6	13.5	5.4
6029003123	27.10	54.09	50-55%	15296 Kern	19	76.5	4.5	41.8	32.3	7.1	0.5	14.9	3.3
6067005904	27.10	54.08	50-55%	4825 Sacramento	10.5	71.5	18	12.4	73.8	5.8	0.6	4.1	3.4
6065041003	27.09	54.07	50-55%	2521 Riverside	13.5	77.5	9	57	34.9	1.8	0.3	4.8	1.2
6059075504	27.08	54.05	50-55%	4041 Orange	11.9	71.6	16.5	28.6	59.6	1.4	0.3	7.7	2.4
6065040807	27.08	54.04	50-55%	3391 Riverside	11.1	80.6	8.3	36.3	51.3	3.7	0.4	5.5	2.8
6037128802	27.07	54.03	50-55%	4325 Los Angeles	12.1	74.3	13.6	18.4	62.8	6.1	0.3	8.9	3.5
6059075513	27.06	54.02	50-55%	5074 Orange	14.8	78.4	6.8	53.9	24.4	3.5	0	16	2.1
6037194500	27.06	54.00	50-55%	2037 Los Angeles	10.5	70	19.5	5.3	82.9	1.9	0	6.6	3.3
6007000903	27.05	53.99	50-55%	6117 Butte	13.8	75.1	11.1	20	64.8	2.4	1.3	7.3	4.2
6037183222	27.05	53.98	50-55%	3483 Los Angeles	9.6	75	15.4	49.2	26.5	2.9	0.4	18.1	3
6067002800	27.05	53.97	50-55%	3291 Sacramento	17.2	74.8	8	39	15.4	30.1	1.5	8.6	5.3
6065045213	27.04	53.95	50-55%	5216 Riverside	13.1	74.8	12.1	61.5	32	1.8	0.1	3.1	1.4
6059062610	27.03	53.94	50-55%	6393 Orange	5.3	88.4	6.3	9.4	54.3	2.7	0.2	28.4	5.1
6029002819	27.00	53.93	50-55%	4586 Kern	16.1	76.8	7.1	33.6	53.3	6.4	0.9	3.2	2.6
6037401312	27.00	53.92	50-55%	5575 Los Angeles	7.8	69.7	22.5	32.1	55.2	2	0.2	7.6	2.8
6037462001	26.98	53.90	50-55%	3974 Los Angeles	15.5	78.9	5.6	66.8	11.1	15.9	0.3	4.1	1.8
6001408600	26.98	53.89	50-55%	5492 Alameda	16.1	74.4	9.5	45.1	2.3	45.1	0.2	5.1	2.3
6037189600	26.97	53.88	50-55%	3529 Los Angeles	5.8	85.8	8.4	13.8	72.1	5.3	0.2	5.2	3.3
6065043506	26.97	53.87	50-55%	6386 Riverside	14.1	63.9	22	38	50	4.7	0.7	4.4	2.2
6067007602	26.97	53.85	50-55%	4619 Sacramento	11	71.5	17.5	10.8	74.2	4	0.5	6.2	4.3
6001422200	26.97	53.84	50-55%	3144 Alameda	8.6	79.9	11.5	11.4	55	12.5	0.1	15.7	5.3
6103000500	26.96	53.83	50-55%	5507 Tehama	13.9	73.4	12.7	17.5	75.5	0.9	2.4	0.8	2.9
6109002100	26.96	53.82	50-55%	4439 Tuolumne	10.1	70.6	19.3	7.1	87.1	0.7	0.8	0.9	3.2
6111000701	26.95	53.80	50-55%	6441 Ventura	19.2	73.5	7.3	86.4	11.8	0.2	0.5	0.7	0.4
6037550602	26.93	53.79	50-55%	4211 Los Angeles	11.2	75.1	13.7	60.9	26.8	1.6	0.1	9.5	1
6029005300	26.92	53.78	50-55%	2139 Kern	27.5	69.8	2.7	26	53	9.2	1.5	4.1	6.2
6005000303	26.92	53.76	50-55%	5073 Amador	11	70.3	18.7	12.4	80	0.3	1.8	1.9	3.6
6067009322	26.92	53.75	50-55%	13206 Sacramento	16.9	76.6	6.5	17.2	20.6	11.8	0.3	44.2	5.9
6037408624	26.92	53.74	50-55%	3227 Los Angeles	8.8	74.2	17	26.5	13.7	1.4	0.1	57.3	1.1
6065043512	26.91	53.73	50-55%	6580 Riverside	17.8	70.7	11.5	50.2	35.7	7	1	3.3	2.8
6013383000	26.91	53.71	50-55%	4485 Contra Costa	10.4	75	14.6	17.6	42.6	11.4	0.4	22.6	5.4
6095252607	26.90	53.70	50-55%	3819 Solano	20.4	72.4	7.2	49.6	20	15.4	0.6	8.9	5.5
6079011103	26.90	53.69	50-55%	2737 San Luis Obispo	7.8	71	21.2	24.9	68.1	1.4	0.2	3.4	2
6041112201	26.90	53.68	50-55%	7809 Marin	18.4	79.6	2	90.4	5.4	1.2	0.1	2	0.7
6073002703	26.89	53.66	50-55%	6900 San Diego	14.6	77.4	8	40.3	27.2	12.8	0.3	15.8	3.7
6007000604	26.89	53.65	50-55%	4217 Butte	8.8	89	2.2	18.9	62.4	4.5	0.5	9.3	4.3
6065043820	26.88	53.64	50-55%	3895 Riverside	16.3	67.5	16.2	37.3	39.3	9.4	0.4	10.9	2.6
6081601200	26.88	53.63	50-55%	6252 San Mateo	11.6	75.7	12.7	30.8	24.9	2.4	0.2	37.9	3.8
6071008602	26.86	53.61	50-55%	3564 San Bernardino	12.7	74.6	12.7	28.9	61.2	3.2	0.3	3.9	2.5
6071012103	26.85	53.60	50-55%	3828 San Bernardino	11.7	72.4	15.9	23.5	68.1	3	0.9	1.2	3.3
6013328000	26.85	53.59	50-55%	2281 Contra Costa	7.1	69.1	23.8	21.9	48.8	6.6	0.7	18.2	3.7
6037183402	26.84	53.58	50-55%	2820 Los Angeles	10.7	78	11.3	47	17.9	1.6	0	31.8	1.6
6073003003	26.82	53.56	50-55%	5062 San Diego	12.3	76.4	11.3	44.9	25.1	18.9	0.8	5.8	4.5
6037482201	26.82	53.55	50-55%	3813 Los Angeles	8	73.9	18.1	16.8	3.2	0.1	0	78.9	1
6085503707	26.81	53.54	50-55%	5462 Santa Clara	17.3	76.3	6.4	48.4	5.5	2.4	0.1	41.9	1.6
6097153808	26.80	53.53	50-55%	4251 Sonoma	14.3	72.4	13.3	43.4	51.7	0.8	1.1	1.3	1.8
6111001507	26.80	53.51	50-55%	4330 Ventura	13.4	76	10.6	38.7	51.5	1.7	0.6	4.8	2.7
6059089107	26.78	53.50	50-55%	5944 Orange	13.5	76.9	9.6	52.6	13.3	0.7	0.2	32.1	1

6073002705	26.77	53.49	50-55%	4300 San Diego	13	74.5	12.5	28.7	16.3	13	0.1	38.9	3
6037900104	26.76	53.47	50-55%	6242 Los Angeles	16.6	75.6	7.8	51.7	33.2	11.4	0.7	0.8	2.2
6067007802	26.76	53.46	50-55%	4808 Sacramento	10.1	71.8	18.1	11.1	76.3	4.7	0.6	3.3	4
6065042715	26.75	53.45	50-55%	12805 Riverside	17.1	75.6	7.3	35.8	43.9	6.2	0.2	10.6	3.3
6081604102	26.74	53.44	50-55%	2321 San Mateo	8.4	75.2	16.4	17.4	30.8	4.6	0	42	5.3
6089010100	26.73	53.42	50-55%	1581 Shasta	7.7	81.4	10.9	11.1	77	2	3.4	1.8	4.6
6073013203	26.73	53.41	50-55%	6464 San Diego	15.3	74.7	10	79.6	8.9	3	0.1	6.9	1.4
6065045501	26.73	53.40	50-55%	5518 Riverside	18.2	76.7	5.1	84.3	8.3	4.7	0.4	1.5	0.8
6037570702	26.73	53.39	50-55%	2433 Los Angeles	10.7	76.7	12.6	30.2	38.8	9.2	0.2	17.4	4.1
6067008131	26.72	53.37	50-55%	4922 Sacramento	11.3	72.7	16	13.5	69.6	7	0.8	3.7	5.3
6085503708	26.70	53.36	50-55%	2725 Santa Clara	12	77.1	10.9	24	5.5	1.9	0.1	66.5	2
6077001200	26.69	53.35	50-55%	5303 San Joaquin	6.2	79.4	14.4	20.4	55.5	3.2	0.4	16.3	4.2
6037481902	26.68	53.34	50-55%	3355 Los Angeles	10.5	71.6	17.9	44.8	10.3	1.9	0.1	41.3	1.6
6037134302	26.67	53.32	50-55%	3732 Los Angeles	11.2	74.9	13.9	22.8	54.4	2.9	0.1	15.3	4.4
6059110607	26.67	53.31	50-55%	3845 Orange	13.5	78.1	8.4	37.6	25.4	2.2	0.2	32.4	2.3
6059063908	26.66	53.30	50-55%	5430 Orange	10.4	82.5	7.1	25.4	49.5	2.6	0.2	18.2	4.1
6001410200	26.66	53.29	50-55%	3062 Alameda	15.6	76.3	8.1	33.9	4.4	53.6	0.1	5.7	2.3
6059021802	26.65	53.27	50-55%	7091 Orange	12.8	71.3	15.9	20.5	67	1.9	0.3	7.4	2.9
6001440200	26.65	53.26	50-55%	5989 Alameda	15.7	76.6	7.7	74.3	6.1	3.5	0.3	14.4	1.3
6001402900	26.65	53.25	50-55%	1434 Alameda	4.3	72.3	23.4	9.6	23.5	20.2	0.1	43.2	3.4
6037406402	26.64	53.23	50-55%	2076 Los Angeles	10.9	72.7	16.4	54.4	25.8	2.6	0.2	14.9	2
6095253402	26.63	53.22	50-55%	6940 Solano	15.6	74.7	9.7	47.8	43.8	1.9	0.8	2.8	2.9
6087122300	26.62	53.21	50-55%	3943 Santa Cruz	10.5	76.4	13.1	26.1	65.6	0.8	0.6	3.9	3
6071004503	26.62	53.20	50-55%	3327 San Bernardino	12.9	79.3	7.8	34.7	50.1	7.8	0.2	3.8	3.3
6085502001	26.62	53.18	50-55%	5022 Santa Clara	13.4	78.7	7.9	50.7	34	2.7	0.4	9.8	2.5
6013372000	26.62	53.17	50-55%	7353 Contra Costa	14.3	77.3	8.4	57.9	14.9	10.5	0.3	13.4	3
6037101400	26.62	53.16	50-55%	3903 Los Angeles	7.9	77.7	14.4	18.5	67.9	1.2	0.2	8.6	3.7
6059099212	26.62	53.15	50-55%	4914 Orange	12.1	77.7	10.2	28.5	49.9	1.3	0.3	17.2	2.8
6037296300	26.61	53.13	50-55%	4221 Los Angeles	10.8	76.4	12.8	35.1	41.2	6.3	0.2	13.3	3.8
6083002702	26.61	53.12	50-55%	7395 Santa Barbara	20.7	73.8	5.5	72.8	17.8	4.5	0.4	2.2	2.3
6019005514	26.61	53.11	50-55%	3961 Fresno	11.9	70.4	17.7	16.1	69.6	1.5	0.7	8.9	3.2
6073012002	26.61	53.10	50-55%	3285 San Diego	11.9	65.5	22.6	35.9	5.8	5.6	0.1	50.2	2.5
6053000103	26.59	53.08	50-55%	3894 Monterey	18.1	72.3	9.6	62	16.6	2.8	0.1	15.3	3.2
6059099906	26.58	53.07	50-55%	4866 Orange	11	71.3	17.7	15.4	61.8	0.9	0.3	18	3.7
6065043306	26.58	53.06	50-55%	4538 Riverside	14.3	67.1	18.6	35.1	54.4	4.5	0.6	3.3	2.1
6037212702	26.58	53.05	50-55%	3635 Los Angeles	8.6	76.5	14.9	16.3	23.1	8.8	0	49.5	2.2
6001440331	26.57	53.03	50-55%	3205 Alameda	15.3	76	8.7	18.4	10.5	7.6	0.2	58	5.3
6033000801	26.57	53.02	50-55%	2894 Lake	14.7	70.5	14.8	23.5	65.8	3.7	1.3	1.4	4.4
6001436700	26.56	53.01	50-55%	3284 Alameda	15.3	75.9	8.8	58.1	13.5	8.5	0.3	17.1	2.4
6073020207	26.56	53.00	50-55%	4765 San Diego	20.4	74.7	4.9	75.2	18.3	1.8	0.1	3.1	1.4
6037550902	26.56	52.98	50-55%	5572 Los Angeles	14.4	77.3	8.3	72	15.7	2.4	0.3	8.1	1.4
6013302008	26.54	52.97	50-55%	7718 Contra Costa	17.2	77.9	4.9	38.8	39.7	9.3	0.6	7.5	4.2
6005000401	26.54	52.96	50-55%	5020 Amador	8.8	64.5	26.7	9.4	84.1	0.4	1.7	1.7	2.6
6053011304	26.53	52.94	50-55%	6688 Monterey	19.9	75.2	4.9	87.9	7.8	0.4	0.4	2.7	0.8
6037401202	26.53	52.93	50-55%	4371 Los Angeles	10.7	75.8	13.5	36.9	49	1.1	0.1	10	2.8
6037551201	26.53	52.92	50-55%	3588 Los Angeles	13.6	73.8	12.6	70.1	18.2	3.9	0.1	6.1	1.6
6085504322	26.52	52.91	50-55%	5263 Santa Clara	15.4	80.1	4.5	10.5	12.5	5.1	0	69.3	2.6
6073020202	26.52	52.89	50-55%	6689 San Diego	22.7	72.2	5.1	79.5	13.7	2.7	0.3	2.5	1.3
6059074110	26.50	52.88	50-55%	3843 Orange	11.2	76.9	11.9	42.9	14.5	1.7	0.2	38.5	2.2
6085512402	26.50	52.87	50-55%	5167 Santa Clara	12.6	74.7	12.7	40.7	48.2	0.6	0.4	7.7	2.3
6001437701	26.50	52.86	50-55%	3649 Alameda	18.2	76.3	5.5	55.4	8.4	15.6	0.4	15.7	4.5
6065031200	26.47	52.84	50-55%	6878 Riverside	12.6	75.1	12.3	47.7	42.8	4.3	0.3	3.2	1.7
6083002306	26.46	52.83	50-55%	8810 Santa Barbara	16.3	71.5	12.2	65	24.5	1.7	0.4	7	1.6
6067007801	26.45	52.82	50-55%	5481 Sacramento	11.2	72.6	16.2	11.8	74	6	0.5	3.7	4
6037480101	26.45	52.81	50-55%	3908 Los Angeles	9.2	77.1	13.7	13.9	21.1	0.5	0.1	62.3	2.1
6037920036	26.44	52.79	50-55%	3419 Los Angeles	15.4	78.7	5.9	55.7	35	1.8	0.6	4.7	2.1
6085508800	26.44	52.78	50-55%	3766 Santa Clara	14.5	80.3	5.2	40	24.7	2.1	0.1	30.6	2.4
6053010501	26.44	52.77	50-55%	6339 Monterey	12.4	75.1	12.5	38.4	52.9	1	0.7	4.4	2.6
6081607400	26.41	52.76	50-55%	4451 San Mateo	12.5	67.5	20	19.7	52.9	1.9	0.1	21.3	4
6085509000	26.40	52.74	50-55%	7407 Santa Clara	15.5	77.1	7.4	47.3	25.5	1.8	0.3	22.2	2.9
6113010608	26.40	52.73	50-55%	5882 Yolo	7.9	89.5	2.6	13.6	43.5	1.9	0.2	36.5	4.3
6037700400	26.39	52.72	50-55%	5237 Los Angeles	4.5	81.7	13.8	10.1	77.5	2.8	0.1	6.3	3.2
6085500200	26.39	52.71	50-55%	5822 Santa Clara	7.2	87.2	5.6	39.4	34.5	6.5	0.3	15.8	3.5
6037195100	26.38	52.69	50-55%	4717 Los Angeles	11	71.5	17.5	14.2	62.3	3.1	0	16.3	4
6037109800	26.37	52.68	50-55%	4565 Los Angeles	11.5	75.5	13	46.2	33.3	3	0.4	14.7	2.5
6071002109	26.37	52.67	50-55%	4626 San Bernardino	16	81.9	2.1	38.8	26.6	22	0.3	8.8	3.5
6071010020	26.37	52.65	50-55%	7471 San Bernardino	19.9	70	10.1	45.8	41.5	8.2	0.2	1.8	2.3
6053014202	26.37	52.64	50-55%	4075 Monterey	13.1	72.2	14.7	29	32.9	6.3	0.2	24.4	7.2
6065045217	26.37	52.63	50-55%	6225 Riverside	18.6	75.5	5.9	79.4	16.5	1.5	0.2	1.7	0.7
6095252611	26.36	52.62	50-55%	3263 Solano	18.1	74.4	7.5	30.8	20.9	30.8	0.9	9.7	6.8
6059011401	26.36	52.60	50-55%	1982 Orange	9.9	74.5	15.6	23.3	66.4	1.8	0.2	5.8	2.6
6065043810	26.35	52.59	50-55%	4933 Riverside	10.8	62.3	26.9	25.7	58.3	5.7	0.4	7.7	2.1
6037482102	26.34	52.58	50-55%	2828 Los Angeles	9.6	70.5	19.9	29.8	9.3	0.7	0	58.1	2.2
6065043311	26.34	52.57	50-55%	2265 Riverside	14.8	73.4	11.8	33.3	57.7	2.9	1.1	2.8	2
6053010608	26.33	52.55	50-55%	3646 Monterey	17.3	80.8	1.9	83.9	9	3.3	0.1	3.1	0.7
6067003501	26.33	52.54	50-55%	2629 Sacramento	11.3	74.8	13.9	26.4	46.9	8.9	0.8	12.6	4.3
6067007204	26.32	52.53	50-55%	4965 Sacramento	16.7	76.3	7	25.3	41.5	10.1	0.9	17.6	4.6
6059110011	26.31	52.52	50-55%	2832 Orange	10.2	68.8	21	13.1	58.1	2.2	0.5	22.8	3.4
6065040701	26.31	52.50	50-55%	2248 Riverside	9.3	79.6	11.1	24.7	68.9	1	0.4	2.7	2.3
6029003807	26.31	52.49	50-55%	3616 Kern	13.3	77.5	9.2	21	72.4	0.7	2	1.6	2.3
6037111100	26.29	52.48	50-55%	2982 Los Angeles	12.7	74.1	13.2	39.2	39.3	3.5	0.1	15.4	2.5
6023000100	26.29	52.47	50-55%	4901 Humboldt	9.9	83.4	6.7	14.1	71.7	2.9	3.4	3.6	4.2
6059021814	26.28	52.45	50-55%	6816 Orange	9.5	81.2	9.3	18.9	54.4	1.5	0.1	22	3.1
6075012302	26.28	52.44	50-55%	3073 San Francisco	2	89.5	8.5	12.1	42.5	7.9	0.7	32.9	3.9
6037650004	26.27	52.43	50-55%	4005 Los Angeles	10.4	80.1	9.5	20.6	27	6.4	0.1	41.2	4.6
6107001901	26.26	52.42	50-55%	3390 Tulare	14.5	70.4	15.1	37.2	55.4	1.5	0.9	2.6	2.4
6001410400	26.25	52.40	50-55%	3792 Alameda	15.7	75.4	8.9	43.4	4.5	40.6	0.1	8.7	2.8
6037106020	26.25	52.39	50-55%	5557 Los Angeles	14.1	77.4	8.5	76.3	16.2	2.3	0.2	3.4	1.5
6073015701	26.23	52.38	50-55%	6239 San Diego	16.5	75	8.5	34.6	44.7	10.1	0.5	3.8	6.3
6037111202	26.23	52.36	50-55%	5213 Los Angeles	10.7	75	14.3	27.3	50.2	2.8	0.2	16.2	3.2
6037501900	26.23	52.35	50-55%	4213 Los Angeles	13.8	77	9.2	67.9	27.6	0.8	0.1	2.5	1.1
6073008702	26.22	52.34	50-55%	5206 San Diego	10.9	74.8	14.3	23.1	49	9	0.7	13.1	5.1
6067009408	26.22	52.33	50-55%	1783 Sacramento	15.9	74.7	9.4	34.1	49.5	3.9	0.6	8.3	3.6
6059052411	26.22	52.31	50-55%	5182 Orange	12.9	76	11.1	44.6	39.3	1	0.3	12.4	2.4
6067005510	26.21	52.30	50-55%	4291 Sacramento	10.7	81.1	8.2	24.2	45.4	16.8	0.3	8	5.3
6037183510	26.21	52.29	50-55%	2725 Los Angeles	13.2	77.6	9.2	78.2	11.1	0.7	0.2	8.6	1.2
6037910401	26.20	52.28	50-55%	6608 Los Angeles	14	78	8	39.9	33.3	13.6	0.4	9.1	3.7
6073018603	26.20	52.26	50-55%	6810 San Diego	14.4	76.7	8.9	63.7	23.8	5.2	0.7	4	2.7
6037401701	26.20	52.25	50-55%	4137 Los Angeles	8.7	69	22.3	22.8	59.3	6.5	0.3	7.8	3.2
6001451501	26.20	52.24	50-55%	4668 Alameda	14.3	71.7	14	16.8	67.5	2.3	0.1	9.7	3.5
6053010804	26.19	52.23	50-55%	5029 Monterey	19.3	73	7.7	88.9	9	0.2	0.1	1.4	0.5
6037109604	26.19	52.21	50-55%	2975 Los Angeles	12.5	75.8	11.7	60.5	23.8	3.9	0.1	9.7	2
6037137104	26.17	52.20	50-55%	2717 Los Angeles	10	69.3	20.7	9.1	77.1	2.8	0.1	5.3	5.6
6065046401	26.16	52.19	50-55%	3768 Riverside	13.8	77.9	8.3	37.8	55.1	1.9	0.2	2.6	2.4
6037311200	26.16	52.18	50-55%	3138 Los Angeles	11.3	77	11.7	33	55.4	1.2	0.1	8.4	1.9
6077004106	26.15	52.16	50-55%	1913 San Joaquin	11	71.4	17.6	35.1	57.4	0.3	0.2	5.1	2
6071011001	26.14	52.15	50-55%	2390 San Bernardino	14.9	74.2	10.9	34.9	59.1	1.2	1.1	1	2.7
6083002705	26.13	52.14	50-55%	4210 Santa Barbara	15.9	70.3	13.8	48.9	36.8	5.4	0.9	4.7	3.3
6085505006	26.13	52.13	50-55%	3898 Santa Clara	13.1	83.8	3.1	5.3	25.7	2.1	0.2	63.6	3.1
6059087704	26.12	52.11	50-55%	5061 Orange	12.9	75.9	11.2	42.2	27.3	2.4	0.1	25.8	2.2
6067009112	26.12	52.10	50-55%	3630 Sacramento	13.1	80.5	6.4	23.1	49.9	10.1	0.6	10.6	5.6
6053011302	26.12	52.09	50-55%	5813 Monterey	21.4	72.3	6.3	87.4	10.5	0.3	0.4	0.6	0.9
6067007020	26.11	52.07	50-55%	4034 Sacramento	15	79	6	17.6	52.5	8.7	0.6	15.7	4.8
6085504805	26.11	52.06	50-55%	5294 Santa Clara	8.3	73.6	18.1	16.7	54.2	2.1	0.2	23.3	3.5
6067005202	26.11	52.05	50-55%	3154 Sacramento	9.5	71.8	18.7	15.5	67.6	4.1	0.7	8.2	3.9
6071009114	26.11	52.04	50-55%	10232 San Bernardino	20.6	75.2	4.2	58.3	16.6	19.7	0.3	2.6	2.6
6073015000	26.05	52.02	50-55%	6193 San Diego	11.5	79.4	9.1	21.6	61.6	6.4	0.3	6	4.1
6113010501	26.05	52.01	50-55%	5922 Yolo	4.8	94.8	0.4	12.5	38.3	2.3	0.2	41.4	5.3
6037920038	26.05	52.00	50-55%	4430 Los Angeles	17	76.3	6.7	49.6	35.1	7	0.1	5.9	2.4
6013336201	26.05	51.99	50-55%	4032 Contra Costa	15.4	75.2	9.4	54.7	29.4	2.5	0.1	11	2.2
6053001400	26.05	51.97	50-55%	2680 Monterey	13.3	76.1	10.6	47.9	41.5	1.6	0.5	4.1	4.3
6037930200	26.04	51.96	50-55%	546 Los Angeles	12.3	77.3	10.4	36.8	55.5	1.8	0.9	3.5	1.5
6055200804	26.04	51.95	50-55%	5566 Napa	18.2	76.6	5.2	69.9	27.2	0.4	0.4	0.6	1.5

6073018700	26.04	51.94	50-55%	37452 San Diego	19.8	80.1	0.1	21.9	62.3	7.3	1.1	3.5	4
6111001301	26.03	51.92	50-55%	7724 Ventura	13	79.6	7.4	40.2	50.2	1.7	0.5	4.2	3.2
6037128500	26.03	51.91	50-55%	4015 Los Angeles	8.7	75.6	15.7	17.1	65.7	6.2	0.2	7.7	3.1
6085503504	26.02	51.90	50-55%	6463 Santa Clara	17.7	75.5	6.8	80	1.9	1.6	0.1	15	1.4
6025011803	26.01	51.89	50-55%	5937 Imperial	18.2	74.9	6.9	74.1	18.2	0.8	0.1	5.5	1.3
6107002006	26.01	51.87	50-55%	4378 Tulare	12.7	76	11.3	25.7	66.6	0.9	0.4	4.1	2.4
6037900805	26.01	51.86	50-55%	5089 Los Angeles	12.8	68	19.2	30.4	48.8	14	0.4	3.2	3.1
6037404000	26.01	51.85	50-55%	4474 Los Angeles	14.7	77.6	7.7	59.1	23	3.4	0.2	12.1	2.2
6073002711	26.00	51.84	50-55%	3200 San Diego	24.8	69.1	6.1	35.9	24.1	14.9	0.3	20.4	4.2
6037181300	26.00	51.82	50-55%	3629 Los Angeles	10.2	73.8	16	33.3	31.6	2.2	0.2	30	2.7
6037111301	25.98	51.81	50-55%	7087 Los Angeles	8.9	81.6	9.5	29.3	37.6	5.5	0.1	23.2	4.3
6111000500	25.98	51.80	50-55%	1867 Ventura	15.7	66.1	18.2	65.6	32	0.2	0.2	1.1	1
6101051100	25.98	51.78	50-55%	2551 Sutter	11.9	70.9	17.2	19.2	71.8	0.5	0.5	5.2	2.7
6037111205	25.97	51.77	50-55%	3375 Los Angeles	9.2	75	15.8	18.1	41.4	4.6	0	32.5	3.4
6037217001	25.97	51.76	50-55%	2654 Los Angeles	18.3	70.2	11.5	6.9	83.3	3	0.1	2.7	4
6001441700	25.97	51.75	50-55%	7436 Alameda	14.4	77.9	7.7	23	27.5	5.2	0.4	39	5
6037406000	25.96	51.73	50-55%	5059 Los Angeles	11.4	75.7	12.9	55.4	29.9	3.3	0.5	9.4	1.5
6059088302	25.95	51.72	50-55%	6029 Orange	11.3	75.4	13.3	26	31.9	1.6	0.1	38.5	1.9
6037406300	25.95	51.71	50-55%	5532 Los Angeles	10.5	75.1	14.4	39	23.6	3.1	0.2	31.8	2.3
6067009107	25.95	51.70	50-55%	3213 Sacramento	11.6	74.1	14.3	14.6	63.3	8.2	0.2	8.1	5.7
6037554802	25.95	51.68	50-55%	6165 Los Angeles	9.5	75.5	15	24.1	25.4	3.5	0.2	44.2	2.5
6095251701	25.95	51.67	50-55%	3372 Solano	13.4	78.6	8	24.5	31.8	24.8	0.9	13.3	4.7
6085504601	25.94	51.66	50-55%	817 Santa Clara	10.4	72.7	16.9	25.6	50.8	3.3	0.1	16.4	3.8
6085505301	25.94	51.65	50-55%	4424 Santa Clara	14.2	77	8.8	37	22.1	2.3	0.2	35	3.4
6065045705	25.94	51.63	50-55%	7522 Riverside	26.2	71.1	2.7	97.4	1.4	0.3	0.1	0.4	0.4
6073018516	25.90	51.62	50-55%	3992 San Diego	13.5	78.7	7.8	37.7	47.7	2.8	0.4	7.8	3.6
6013386000	25.90	51.61	50-55%	3317 Contra Costa	11.3	73.2	15.5	17.5	30	14.1	0.5	32.8	5.1
6037137501	25.89	51.60	50-55%	4124 Los Angeles	9.5	76.9	13.6	13	67.6	5.3	0.1	8.8	5.3
6037195400	25.89	51.58	50-55%	4395 Los Angeles	6.7	81.8	11.5	26.9	53.5	2.7	0.1	13.7	3.1
6001408500	25.89	51.57	50-55%	4972 Alameda	17.3	74.5	8.2	45.5	2	45.6	0.2	4.3	2.4
6065040613	25.88	51.56	50-55%	12842 Riverside	20	75.4	4.6	39.3	24.7	9.3	0.2	23.4	3.1
6001406601	25.88	51.54	50-55%	4596 Alameda	13.2	78	8.8	23.4	12.1	26.7	0.5	33.5	3.8
6037481714	25.88	51.53	50-55%	2551 Los Angeles	7.7	68.4	23.9	11.2	1.8	0.3	0	85.9	0.8
6107003501	25.86	51.52	50-55%	2861 Tulare	15.1	70.5	14.4	37.2	51.7	0.3	0.5	7.9	2.4
6037195500	25.85	51.51	50-55%	4971 Los Angeles	8.1	80.1	11.8	33.3	43.5	1.9	0.1	18.1	3.2
6071002033	25.85	51.49	50-55%	7663 San Bernardino	14.3	80.2	5.5	35.2	44.8	5.9	0.3	10.8	3.2
6097150901	25.85	51.48	50-55%	4904 Sonoma	13.7	76.7	9.6	31	62.1	1.5	0.3	2	3.2
6037463200	25.85	51.47	50-55%	3403 Los Angeles	10.3	69.7	20	25.8	42.7	5.3	0.2	23	3
6059099703	25.84	51.46	50-55%	4979 Orange	10.6	72.5	16.9	15	39.5	0.9	0.1	41.6	2.8
6097153001	25.84	51.44	50-55%	6594 Sonoma	16.6	74.8	8.6	42.7	43.9	2.7	1	6.2	3.4
6085504002	25.83	51.43	50-55%	5875 Santa Clara	15.6	75	9.4	66.3	3.5	2.7	0.2	26	1.3
6065042619	25.83	51.42	50-55%	11267 Riverside	21.6	74.8	3.6	62.5	13.3	15.2	0.2	6.1	2.7
6011000300	25.82	51.41	50-55%	6055 Colusa	18	72.8	9.2	68.7	26.6	0.9	1	2	0.9
6037301000	25.82	51.39	50-55%	4841 Los Angeles	9	75.3	15.7	18.7	55.8	2.3	0.2	20	3.1
6013313103	25.81	51.38	50-55%	7723 Contra Costa	13.5	77.2	9.3	32.8	28.8	16.8	0.3	16.3	4.9
6037403401	25.79	51.37	50-55%	5038 Los Angeles	10.2	77.2	12.6	27	13	2.8	0.1	55	2.1
6067008135	25.78	51.36	50-55%	4000 Sacramento	10.9	64.4	24.7	11.9	75.4	4.9	0.3	3.6	3.9
6037267502	25.78	51.34	50-55%	3243 Los Angeles	7.6	82.4	10	22.5	50.9	2.6	0.1	19.5	4.5
6059075816	25.78	51.33	50-55%	3709 Orange	15.7	76.6	7.7	44.3	35.8	2.2	0.2	14.8	2.8
6037403402	25.77	51.32	50-55%	3322 Los Angeles	8	77.6	14.4	23.9	17.4	2.7	0.3	53.4	2.2
6065046402	25.77	51.31	50-55%	4684 Riverside	14.8	77.3	7.9	42.3	51.1	2	0.6	1.3	2.8
6059099234	25.76	51.29	50-55%	3466 Orange	8.6	69	22.4	10.4	51.2	0.6	0.3	34.4	3.1
6029005600	25.76	51.28	50-55%	2253 Kern	14.3	72.6	13.1	18	68	7	1.8	2.1	3.1
6067003102	25.76	51.27	50-55%	2933 Sacramento	14.9	73.3	11.8	44.3	34.7	4.9	1.5	11.1	3.5
6073012003	25.75	51.25	50-55%	3351 San Diego	13.7	74.4	11.9	58.4	10.3	3	0.1	26	2.1
6115040800	25.75	51.24	50-55%	4233 Yuba	15.4	73	11.6	16.8	71.2	0.8	1.5	5	4.7
6085512100	25.75	51.23	50-55%	1666 Santa Clara	11.4	75.1	13.5	42.1	37	0.5	0.4	17.5	2.6
6013356001	25.74	51.22	50-55%	3759 Contra Costa	10.9	76.8	12.3	23.9	26.2	13.2	0.3	30.8	5.6
6103000100	25.73	51.20	50-55%	4699 Tehama	11.1	68.5	20.4	10.5	82.8	0.9	2.2	0.5	3.1
6059110401	25.72	51.19	50-55%	4953 Orange	13.4	75.4	11.2	40.8	33.2	3	0.1	19.7	3.1
6089012701	25.72	51.18	50-55%	4392 Shasta	12.8	67.8	19.4	9.9	80.7	0.4	5.4	0.3	3.2
6073010112	25.72	51.17	50-55%	4764 San Diego	18.2	76.8	5	83	6.5	4.6	0.3	4.1	1.6
6107001800	25.71	51.15	50-55%	4689 Tulare	15.4	71.2	13.4	38.9	53.9	2.3	0.7	1.7	2.5
6077004204	25.70	51.14	50-55%	3006 San Joaquin	10.9	71.9	17.2	20.6	73.9	0.5	0.7	2.2	2.1
6033000802	25.69	51.13	50-55%	4234 Lake	15	72.2	12.8	23.3	65.5	3.4	1.7	1.5	4.6
6059099250	25.69	51.12	50-55%	3062 Orange	8.2	73.4	18.4	14.5	52.9	1.3	0.3	27.7	3.3
6097152100	25.69	51.10	50-55%	3004 Sonoma	8.6	80.6	10.8	22.7	63.8	3.5	1.8	5.2	2.9
6065044300	25.68	51.09	50-55%	4774 Riverside	12.8	75.8	11.4	48.5	29.6	7.8	1.1	10.9	2.1
6037650602	25.67	51.08	50-55%	7161 Los Angeles	10.9	76.4	12.7	11.1	29.3	4.2	0.2	50.6	4.6
6065042412	25.67	51.07	50-55%	5129 Riverside	10.2	77.7	12.1	31	46.1	12.6	0.2	6.1	4
6075012202	25.67	51.05	50-55%	2986 San Francisco	4.2	86.7	9.1	18.4	35.1	12.7	1	28.1	4.8
6067007416	25.65	51.04	50-55%	3866 Sacramento	13.9	73.2	12.9	19.7	58.4	10.2	0.6	5.4	5.7
6073010104	25.65	51.03	50-55%	3217 San Diego	11.2	73.3	15.5	46.9	33	1.9	0.5	13.5	4.2
6073016804	25.65	51.02	50-55%	7292 San Diego	16.3	77.9	5.8	23.3	69.7	1.1	0.7	1.4	3.7
6065041910	25.64	51.00	50-55%	6342 Riverside	13.5	72	14.5	33.9	50.5	5.4	0.2	6.9	3.2
6067007019	25.64	50.99	50-55%	1203 Sacramento	29.4	68.1	2.5	24.2	12.9	39.2	0.2	14.6	8.9
6067003502	25.64	50.98	50-55%	2916 Sacramento	10.5	71.9	17.6	30	40.4	3.5	0.7	21.8	3.6
6103000600	25.64	50.96	50-55%	5213 Tehama	11.9	70.1	18	15.3	78.6	0.5	1.2	1.7	2.7
6013336102	25.64	50.95	50-55%	7595 Contra Costa	18.8	77.7	3.5	65	16.8	5.6	0.4	9.5	2.7
6075010700	25.63	50.94	50-55%	5592 San Francisco	5.4	65.5	29.1	3	14.9	1.5	0.1	79.3	1.2
6059088301	25.62	50.93	50-55%	6430 Orange	14.1	74.7	11.2	41.5	26	0.8	0.2	29.4	2
6069000501	25.60	50.91	50-55%	5395 San Benito	14.8	79.2	6	46.2	47	0.7	0.5	3	2.6
6111001502	25.59	50.90	50-55%	8668 Ventura	12.9	74.5	12.6	34.5	54.2	1.9	0.4	6.3	2.6
6071012200	25.59	50.89	50-55%	6076 San Bernardino	4.1	94.5	1.4	35.8	26.1	23.1	0.4	12	2.5
6097153005	25.58	50.88	50-55%	6669 Sonoma	11.1	74.8	14.1	24.5	64.9	1.3	1.1	5.3	2.9
6073020108	25.57	50.86	50-55%	5813 San Diego	18.1	75.5	6.4	69.2	20.7	2.7	0.6	5.3	1.5
6059075301	25.56	50.85	50-55%	5712 Orange	15.6	76.2	8.2	66.7	19.7	1.4	0.3	10.6	1.3
6067007012	25.54	50.84	50-55%	3345 Sacramento	13.8	79.5	6.7	34.1	38	16.1	0.4	7.1	4.2
6073014805	25.53	50.83	50-55%	4328 San Diego	9.9	76.2	13.9	19.6	62.5	8.1	0.3	6.2	3.3
6085501900	25.53	50.81	50-55%	4641 Santa Clara	12.2	78.2	9.6	38.1	32.8	7.5	0.3	17.8	3.5
6081601400	25.52	50.80	50-55%	6658 San Mateo	8.7	74.9	16.4	11.2	12.1	2.1	0.1	71.3	3.3
6085503713	25.51	50.79	50-55%	2974 Santa Clara	16.9	67.9	15.2	61.9	6.1	3.3	0.4	26.8	1.6
6077003209	25.49	50.78	50-55%	3540 San Joaquin	12.6	73	14.4	28.4	47.7	10.1	0.3	9.7	3.8
6067007018	25.49	50.76	50-55%	5083 Sacramento	12.8	81	6.2	16.9	31.9	14.4	0.4	30.1	6.3
6059075807	25.48	50.75	50-55%	4324 Orange	12.4	74.1	13.5	40.6	45.3	1.4	0.5	10	2.2
6001428100	25.47	50.74	50-55%	4651 Alameda	12.2	76.3	11.5	13.3	57.9	3.1	0.2	19.5	6
6071000105	25.45	50.73	50-55%	6676 San Bernardino	10.3	83.5	6.2	22.5	25.3	4.8	0.1	44.2	3
6073018903	25.44	50.71	50-55%	4861 San Diego	13	72	15	48.3	47.1	0.7	0.5	1.6	1.8
6095253101	25.44	50.70	50-55%	4974 Solano	12.5	72.7	14.8	26.4	63.9	2.5	0.5	3.5	3.3
6059110014	25.44	50.69	50-55%	4905 Orange	12.6	78.6	8.8	25	51.3	4	0.1	15.3	4.2
6059062647	25.44	50.67	50-55%	4123 Orange	5.8	45.9	48.3	17	65	0.8	0.1	14.9	2.2
6001405600	25.43	50.66	50-55%	3137 Alameda	10.8	80.6	8.6	13.1	20.8	22.6	0.3	38.5	4.7
6067009634	25.43	50.65	50-55%	4913 Sacramento	19.9	75.5	4.6	36.5	7.8	25.5	0.5	25	4.6
6059088105	25.43	50.64	50-55%	4133 Orange	10.7	76.1	13.2	30.4	26.3	1	0.1	40.5	1.6
6001425103	25.42	50.62	50-55%	2502 Alameda	8.6	87.1	4.3	9.8	42	17.5	0.1	24.3	6.3
6071008200	25.40	50.61	50-55%	5147 San Bernardino	10.6	70.6	18.8	17.2	73.2	2.9	0.4	3.5	2.8
6001430500	25.39	50.60	50-55%	6049 Alameda	11.5	77.7	10.8	23.2	35.4	21.3	0.3	15.6	4.1
6083003001	25.38	50.59	50-55%	5547 Santa Barbara	13.1	76.8	10.1	58.2	29.4	1.6	0.5	8.5	1.7
6067009501	25.38	50.57	50-55%	2772 Sacramento	16.1	70.5	13.4	55.6	39.4	0.6	0.5	2	1.8
6037670100	25.37	50.56	50-55%	6659 Los Angeles	12.2	75.2	12.6	31.2	41.7	6.6	0.4	16.1	3.9
6037300400	25.37	50.55	50-55%	5740 Los Angeles	10.3	78.8	10.9	16.5	58.5	0.6	0.1	20.9	3.3
6037920035	25.36	50.54	50-55%	7720 Los Angeles	15.8	78.4	5.8	49.6	36.7	3.1	0.2	7.8	2.6
6037502005	25.36	50.52	50-55%	4251 Los Angeles	13.5	77.5	9	73.9	21.6	0.8	0.4	2.4	0.8
6037462100	25.35	50.51	50-55%	5259 Los Angeles	14.3	77.4	8.3	61	18.2	13.2	0.1	4.8	2.8
6001430900	25.35	50.50	50-55%	4681 Alameda	13.1	75.2	11.7	26.9	42.2	8.8	0.5	16.5	5.1
6037554516	25.35	50.49	50-55%	3902 Los Angeles	8.1	73.7	18.2	12.1	15.6	6.2	0.1	63.4	2.6
6059063808	25.35	50.47	50-55%	6393 Orange	16.9	79.2	3.9	74.5	19.3	1.1	0.4	3.6	1.2
6037670001	25.35	50.46	50-55%	3311 Los Angeles	11.3	73.5	15.2	31.7	46.7	1.8	0.2	15.4	4.1
6037301205	25.34	50.45	50-55%	2209 Los Angeles	10.7	72.2	17.1	8.7	75.6	0.8	0	11.9	3
6037480102	25.33	50.44	50-55%	4303 Los Angeles	11.6	73.8	14.6	24.8	18	1.5	0.1	53.4	2.1
6081610601	25.33	50.42	50-55%	6257 San Mateo	17.4	77.7	4.9	82.4	10.4	1.2	0.2	4.3	1.5
6005000301	25.31	50.41	50-55%	5871 Amador	3.1	89.4	7.5	29.1	51.6	13.8	1.4	1.5	2.6
6037271802	25.30	50.40	50-55%	5911 Los Angeles	7.9	83.7	8.4	25.4	36.2	8.2	0.2	25.7	4.4

6113011102	25.30	50.38	50-55%	4884 Yolo	17.3	73.8	8.9	67.4	21.7	1	0.3	8.2	1.5
6037900605	25.27	50.37	50-55%	7100 Los Angeles	17.7	74	8.3	48.4	28.5	16.8	0.4	3.1	2.9
6067003400	25.26	50.36	50-55%	4085 Sacramento	10.4	66	23.6	22.1	39.3	14.3	0.2	18.9	5.3
6111004200	25.26	50.35	50-55%	5324 Ventura	16.2	74	9.8	71	19	1.8	0.6	5.6	2
6065043279	25.22	50.33	50-55%	5093 Riverside	13.4	71	15.6	25.3	68.2	1.4	0.6	2.1	2.4
6037408704	25.22	50.32	50-55%	3155 Los Angeles	7.5	69.4	23.1	26.8	10.3	1.6	0.1	59.1	2.2
6037183221	25.20	50.31	50-55%	3118 Los Angeles	12	78.6	9.4	66.1	21	2.7	0.4	8.5	1.4
6037481101	25.19	50.30	50-55%	3814 Los Angeles	9.5	75	15.5	35.8	11.5	2.5	0.2	47.9	2.1
6037181600	25.18	50.28	50-55%	4352 Los Angeles	7.8	84.8	7.4	36.6	36.4	2	0.4	20.4	4.3
6037189800	25.17	50.27	50-55%	4021 Los Angeles	4.5	84.9	10.6	10.3	77.5	4.2	0.1	5	3
6073000700	25.17	50.26	50-55%	3754 San Diego	3.7	83.9	12.4	15.6	72.5	2.7	0.3	5.7	3.1
6065031001	25.16	50.25	50-55%	5622 Riverside	12.3	69.9	17.8	38.5	49	6.1	0.5	3.2	2.7
6059075901	25.15	50.23	50-55%	4126 Orange	11.6	81.5	6.9	40.9	51.2	1.5	0.5	3.7	2.3
6013321200	25.15	50.22	50-55%	5533 Contra Costa	9.1	82.4	8.5	14.4	50.5	2.9	0.3	27.5	4.4
6111001503	25.14	50.21	50-55%	5898 Ventura	9.4	79.4	11.2	39.3	50.4	3.4	0.5	3.8	2.4
6013303205	25.14	50.20	50-55%	8309 Contra Costa	10.7	63.1	26.2	18.6	70.4	3.3	0.2	4.5	3
6095253107	25.13	50.18	50-55%	6016 Solano	15.7	73.9	10.4	30.6	50	7.6	0.9	5.3	5.7
6001428400	25.13	50.17	50-55%	4357 Alameda	9.5	73	17.5	13.3	47.6	7.4	0.5	26.6	4.7
6037267200	25.12	50.16	50-55%	5927 Los Angeles	9.6	75.9	14.5	7.6	67.6	1.8	0.1	17.5	5.4
6037431502	25.11	50.15	50-55%	4361 Los Angeles	11.3	73.9	14.8	32.3	28.6	0.9	0.1	36.6	1.5
6073000300	25.10	50.13	50-55%	4732 San Diego	3.7	79.5	16.8	14.5	73.1	2.3	0.3	6.7	3.2
6037910502	25.10	50.12	50-55%	4086 Los Angeles	19.5	74.3	6.2	68	16.3	12.4	0	1.4	1.8
6073013409	25.10	50.11	50-55%	5380 San Diego	11	75.6	13.4	50.8	29.5	4.1	0.6	12.2	2.8
6053011102	25.09	50.09	50-55%	11454 Monterey	19.9	74.5	5.6	86.5	8.4	1.2	0.2	2.6	1.1
6071008301	25.09	50.08	50-55%	6340 San Bernardino	9.9	69.6	20.5	17.8	66.3	3.6	0.3	8.9	3
6073020211	25.09	50.07	50-55%	6702 San Diego	16.9	73.9	9.2	61.5	27.2	2.4	0.5	5.9	2.4
6111006000	25.08	50.06	50-55%	4845 Ventura	11.3	76.2	12.5	23.2	66.5	0.7	0.1	6.3	3.1
6075025100	25.07	50.04	50-55%	3077 San Francisco	9.6	78	12.4	23.4	54	4.8	0.1	13.3	4.3
6059110605	25.07	50.03	50-55%	6638 Orange	10.5	76	13.5	7.7	19.5	0.9	0	69.9	2
6037461902	25.07	50.02	50-55%	1654 Los Angeles	5.7	81.8	12.5	16.3	43.8	14.6	0.4	21.2	3.7
6053000104	25.06	50.01	50-55%	3478 Monterey	14.2	75	10.8	64.4	23.3	1.4	0.6	7.7	2.5
6059001101	25.04	49.99	45-50%	4523 Orange	13.1	74.2	12.7	45.8	46.8	1.1	0.3	4.3	1.6
6083001000	25.04	49.98	45-50%	6270 Santa Barbara	9.4	80.6	10	46.3	45.7	2	0.5	3.2	2.4
6019004208	25.03	49.97	45-50%	7124 Fresno	14.4	74.6	11	23.1	52.1	6.1	0.3	15.3	3.2
6037572001	25.03	49.96	45-50%	5278 Los Angeles	13.1	77.5	9.4	25.5	50.6	8.5	0.4	10.7	4.4
6029003811	25.02	49.94	45-50%	2661 Kern	11.8	74.1	14.1	20.2	72.6	1.4	1.1	2.6	2.2
6037195201	25.01	49.93	45-50%	2834 Los Angeles	6.7	80.7	12.6	16.1	65.3	2.3	0.1	12.4	3.9
6095252707	25.01	49.92	45-50%	4753 Solano	13.3	72.1	14.6	21.2	41.1	19.5	0.3	11	6.8
6103000300	25.00	49.91	45-50%	4515 Tehama	9.4	70.8	19.8	13.1	78.9	1.2	1.6	2.2	3
6083002706	25.00	49.89	45-50%	6054 Santa Barbara	19.3	72.8	7.9	67	24.5	3.3	0.5	2.2	2.4
6037651102	24.98	49.88	45-50%	3639 Los Angeles	8.7	65.8	25.5	12.6	47	2.4	0.1	33.9	4
6065041812	24.98	49.87	45-50%	3319 Riverside	12.4	74.8	12.8	42.3	47.5	3.5	0.3	4.3	2.1
6067009109	24.97	49.85	45-50%	4842 Sacramento	10.4	76.9	12.7	18	58.2	9.4	0.5	9.1	4.8
6065040814	24.97	49.84	45-50%	4782 Riverside	15.8	80.2	4	35.9	32.8	12.9	0.3	13.6	4.6
6037401601	24.97	49.83	45-50%	5034 Los Angeles	8.5	65.4	26.1	29	56.4	4.1	0.2	7.9	2.4
6067009610	24.97	49.82	45-50%	6072 Sacramento	16.2	77.1	6.7	28.8	16.4	20.8	0.6	27.7	5.7
6001403501	24.96	49.80	45-50%	4374 Alameda	6.7	75.1	18.2	10.1	31.3	27.9	0.4	24	6.3
6081606000	24.95	49.79	45-50%	4959 San Mateo	13.3	74.7	12	44.2	35	2.1	0.2	15.8	2.7
6059099902	24.95	49.78	45-50%	4486 Orange	13.1	77.3	9.6	29.6	39.2	1.2	0.3	26.4	3.2
6037310201	24.94	49.77	45-50%	5466 Los Angeles	10.5	77.5	12	13.7	67.3	1.7	0	14	3.3
6001441926	24.93	49.75	45-50%	4080 Alameda	16.5	77.3	6.2	32.2	19.2	4.4	0.4	37.7	6.1
6037128702	24.92	49.74	45-50%	5639 Los Angeles	9.2	74.7	16.1	13.5	70.1	6	0.3	7	3.1
6037461300	24.91	49.73	45-50%	6638 Los Angeles	10.7	73.1	16.2	17.5	62.4	6.7	0.1	8.8	4.5
6111008201	24.91	49.72	45-50%	4315 Ventura	14.5	74.5	11	29.5	56.2	0.8	0.3	9.7	3.4
6085512509	24.91	49.70	45-50%	4111 Santa Clara	15	75.9	9.1	54.1	36	1.5	0.3	6	2
6085506402	24.91	49.69	45-50%	5733 Santa Clara	13.6	75.4	11	30.4	46.9	4.8	0.4	14	3.5
6067005508	24.91	49.68	45-50%	3106 Sacramento	7.1	77	15.9	14.2	60.8	10.6	0.5	8.4	5.6
6073003004	24.90	49.67	45-50%	4940 San Diego	17.8	76.4	5.8	70.7	6.6	15.8	0.1	4.5	2.2
6071000109	24.90	49.65	45-50%	6752 San Bernardino	12	80.8	7.2	32.9	53	2.1	0.2	9.3	2.5
6053014201	24.88	49.64	45-50%	5133 Monterey	13.8	72.8	13.4	32.4	31.7	6.1	0.4	21	8.5
6037400604	24.87	49.63	45-50%	2980 Los Angeles	14.4	76.9	8.7	47.8	32	2.9	0.1	15.8	1.4
6037408212	24.86	49.62	45-50%	4485 Los Angeles	10.4	73.7	15.9	28.6	12.3	1.7	0.1	55.6	1.7
6073013302	24.85	49.60	45-50%	4933 San Diego	12.8	72.8	14.4	68.8	21.6	1.8	0.4	5.7	1.8
6013303201	24.84	49.59	45-50%	9989 Contra Costa	16.4	77.7	5.9	23.8	41.4	14.4	0.3	14.6	5.5
6085504317	24.84	49.58	45-50%	4429 Santa Clara	11	77.1	11.9	14.5	11.7	1.6	0.2	69.1	2.9
6065042726	24.84	49.56	45-50%	5357 Riverside	21.2	72.9	5.9	40.2	46.7	4.5	0.2	4.9	3.5
6065043270	24.83	49.55	45-50%	4991 Riverside	13.4	74.7	11.9	31.5	54.7	3.5	0.5	6	3.8
6067003900	24.83	49.54	45-50%	3374 Sacramento	9.3	65.2	25.5	18.9	45.2	8.9	0.4	21.2	5.3
6037503302	24.81	49.53	45-50%	6271 Los Angeles	14.1	78.3	7.6	73.1	19.5	1.5	0.3	4.6	1
6085512038	24.81	49.51	45-50%	2847 Santa Clara	12.5	82.5	5	26.8	37.7	5.1	0.3	26.2	3.9
6029002821	24.80	49.50	45-50%	4897 Kern	16.2	77.8	6	35.6	52.4	4.9	1	3.3	2.9
6037106645	24.79	49.49	45-50%	3389 Los Angeles	9.6	68.5	21.9	16.1	63.5	3.4	0.1	14	3
6037408136	24.78	49.48	45-50%	3849 Los Angeles	11.7	76.2	12.1	52.2	13	3.4	0.1	28.7	2.5
6073018610	24.78	49.46	45-50%	7635 San Diego	17.4	74.3	8.3	56.6	25.6	5.4	0.2	8.6	3.7
6073018519	24.77	49.45	45-50%	5891 San Diego	16.9	73.8	9.3	62.9	24	2.7	0.5	6.9	3
6065044702	24.77	49.44	45-50%	2295 Riverside	14.5	76.9	8.6	82.2	10.4	2.4	0.3	3.9	0.8
6111001204	24.75	49.43	45-50%	2473 Ventura	12.7	78.1	9.2	46.2	48.4	0.8	0.6	1.4	2.5
6037910504	24.74	49.41	45-50%	4797 Los Angeles	19.5	74.6	5.9	67.9	16.4	11.6	0.3	2.1	1.7
6037401101	24.74	49.40	45-50%	5663 Los Angeles	13	74.6	12.4	36.2	50.1	2.7	0.3	7.6	3
6059099224	24.74	49.39	45-50%	3521 Orange	9.6	72.6	17.8	8.5	45.6	0.5	0.2	42.4	2.8
6059001501	24.73	49.38	45-50%	6373 Orange	10.2	68.6	21.2	19.8	59.4	0.6	0.2	18.1	1.9
6081604400	24.72	49.36	45-50%	4448 San Mateo	9.7	74.6	15.7	20.9	32.7	1.4	0.1	41.4	3.5
6037119310	24.72	49.35	45-50%	3871 Los Angeles	13.6	73.3	13.1	68.9	11	4.2	0.1	14.5	1.3
6059075303	24.71	49.34	45-50%	3412 Orange	12.1	72.7	15.2	42.2	49	1.3	0.1	5.2	2.1
6111007100	24.70	49.33	45-50%	6335 Ventura	13.3	75.2	11.5	43.5	46.3	2.1	0.2	5.5	2.4
6045011500	24.68	49.31	45-50%	6739 Mendocino	15.4	73.7	10.9	31.1	59.9	0.8	3.2	2	2.9
6077003114	24.66	49.30	45-50%	10129 San Joaquin	12.4	76.4	11.2	17.2	47.4	5.7	0.3	25.4	3.9
6073020213	24.64	49.29	45-50%	4028 San Diego	23.7	71.2	5.1	86.7	9.8	1.1	0	1.7	0.7
6075016100	24.64	49.27	45-50%	5366 San Francisco	7.9	66.1	26	9.7	26.3	37.6	0.1	22.4	3.9
6037141201	24.62	49.26	45-50%	3707 Los Angeles	10.6	81	8.4	16	67.4	6.7	0.1	6.5	3.4
6059052408	24.62	49.25	45-50%	6154 Orange	9.9	76.8	13.3	12.3	71.8	1.9	0.2	10.7	3.2
6029000902	24.62	49.24	45-50%	3340 Kern	15.4	70.3	14.3	47.5	43.1	4.6	1.2	2.5	1.3
6081607701	24.62	49.22	45-50%	3954 San Mateo	12.6	77.7	9.7	36	29.6	2	0.1	28	4.2
6037403316	24.61	49.21	45-50%	6783 Los Angeles	10	76	14	27.3	29.1	6.9	0.1	34.1	2.4
6029002818	24.61	49.20	45-50%	3761 Kern	11.5	76.2	12.3	25.8	60.3	6.3	1	3.8	2.8
6001441602	24.61	49.19	45-50%	6802 Alameda	13.9	76.7	9.4	24.7	27.2	5.5	0.2	37.2	5.2
6065041911	24.60	49.17	45-50%	10258 Riverside	16.4	72.9	10.7	26	48.7	7.2	0.3	14.4	3.3
6071002028	24.60	49.16	45-50%	5282 San Bernardino	14.7	79.4	5.9	39	43.4	9.4	0.3	5.3	2.6
6037189903	24.60	49.15	45-50%	2164 Los Angeles	2.4	87.3	10.3	8.4	77.3	4.5	0.1	6.1	3.5
6071000818	24.60	49.14	45-50%	5428 San Bernardino	10	74	16	29.8	56.6	5.6	0.1	5.6	2.2
6037463101	24.59	49.12	45-50%	2383 Los Angeles	10.6	75.8	13.6	34.6	34.8	3.1	0.6	24	2.9
6059075902	24.59	49.11	45-50%	6548 Orange	11.4	78	10.6	40.8	50.7	1.3	0.2	4.6	2.4
6089010500	24.58	49.10	45-50%	4928 Shasta	14.1	73.2	12.7	9.6	79.1	2	2.5	2.4	4.4
6037297500	24.58	49.09	45-50%	5163 Los Angeles	11.4	73	15.6	28.4	59.5	3.6	0.2	4.6	3.7
6037462800	24.58	49.07	45-50%	2915 Los Angeles	12.2	76.7	11.1	32.7	40.6	8.7	0.2	14.7	3.1
6109005100	24.57	49.06	45-50%	8355 Tuolumne	9.1	68.9	22	10.2	83.7	0.4	1.7	0.8	3.1
6037214503	24.55	49.05	45-50%	3325 Los Angeles	14.2	75.1	10.7	6.3	39.5	4.9	0.1	46	3.2
6019005801	24.55	49.04	45-50%	4856 Fresno	11.6	75.8	12.6	29	56.3	3	1.1	8	2.6
6001435602	24.55	49.02	45-50%	5329 Alameda	15	76.2	8.8	52.5	23.8	9.9	0.4	11.2	2.3
6037113102	24.54	49.01	45-50%	2828 Los Angeles	6.6	72.6	20.8	13	66.8	3.3	0	13.8	3
6059099204	24.53	49.00	45-50%	4729 Orange	10.2	72.1	17.7	12.6	22.4	0.6	0	62.9	1.4
6037405600	24.53	48.98	45-50%	5428 Los Angeles	11.6	72.9	15.5	58.8	22	2.8	0.1	15.4	1
6053011202	24.53	48.97	45-50%	6868 Monterey	21.8	73.1	5.1	88.1	7.5	1.2	0.4	1.6	1.1
6073014001	24.52	48.96	45-50%	4630 San Diego	12.7	76.2	11.1	39.5	40.8	8.3	0.5	7.3	3.6
6001406602	24.52	48.95	45-50%	2493 Alameda	13.2	78.9	7.9	29.6	11.1	26	0.9	28.4	4
6073013303	24.52	48.93	45-50%	4909 San Diego	12.5	71.5	16	75.2	15.2	2.2	0.5	5.3	1.5
6059099226	24.52	48.92	45-50%	3889 Orange	10.2	71.5	18.3	13	30.1	0.7	0.3	53.6	2.3
6001408300	24.52	48.91	45-50%	4167 Alameda	11.5	77.5	11	16.2	24	45	0.4	8.7	5.7
6073009400	24.51	48.90	45-50%	5028 San Diego	12.7	87.2	0.1	20.4	59.3	9.4	1.1	5	4.8
6073002601	24.49	48.88	45-50%	6148 San Diego	18.5	76.6	4.9	70.9	6.1	4.1	0.1	17.6	1.2
6037141202	24.47	48.87	45-50%	2800 Los Angeles	10.9	76.7	12.4	9	77.9	3.8	0	5.2	4
6037189500	24.46	48.86	45-50%	4452 Los Angeles	4.1	87.3	8.6	12.7	72.2	4.6	0.3	6.2	4.1
6037137402	24.45	48.85	45-50%	5364 Los Angeles	10	67	23	7.7	76.4	4.7	0.1	6.2	5

6075025701	24.45	48.83	45-50%	4788 San Francisco	9.4	75.9	14.7	22.4	11.6	3.3	0.1	60.8	1.8
6107001400	24.45	48.82	45-50%	5581 Tulare	16	73.3	10.7	49.9	45.8	0.3	0.6	1.6	1.8
6067009611	24.44	48.81	45-50%	3165 Sacramento	14.2	77	8.8	22	42.3	14.5	0.2	14.2	6.8
6037181400	24.44	48.80	45-50%	4302 Los Angeles	9.4	75.9	14.7	35.7	29.3	2.3	0.2	29.7	2.7
6067008705	24.43	48.78	45-50%	4397 Sacramento	20	75.6	4.4	11.1	45.2	6.7	0.3	31.6	5.2
6077005502	24.43	48.77	45-50%	1806 San Joaquin	13.8	77	9.2	35.2	50.7	3.3	0.3	7.3	3.2
6073020308	24.43	48.76	45-50%	5743 San Diego	11.8	65	23.2	35.5	50.5	3.9	0.2	6.9	3
6073020403	24.43	48.75	45-50%	4107 San Diego	12.9	74.8	12.3	40.2	48.8	1.4	0.7	7	1.9
6059063902	24.42	48.73	45-50%	6670 Orange	10.8	82.9	6.3	32.1	48.4	2	0.3	13.2	4.1
6067007016	24.42	48.72	45-50%	5537 Sacramento	18.6	77	4.4	22	28.2	14	0.4	28.5	6.8
6023001300	24.41	48.71	45-50%	1479 Humboldt	10.7	80.9	8.4	9.3	80.1	1.1	2.6	0.5	6.4
6109004100	24.40	48.69	45-50%	5358 Tuolumne	8.1	62.5	29.4	7.8	87.8	0.2	0.9	1.2	2
6037600703	24.40	48.68	45-50%	1914 Los Angeles	7.5	69.8	22.7	3.4	1.9	89.8	0.2	1	3.7
6103000400	24.40	48.67	45-50%	5508 Tehama	9.5	69.9	20.6	9.5	85.2	0.3	1.4	1	2.5
6073002801	24.39	48.66	45-50%	3068 San Diego	3	87.4	9.6	14.7	65.4	3.4	0.2	11.4	4.9
6099003907	24.39	48.64	45-50%	7460 Stanislaus	10	65.9	24.1	16.1	75.8	1.2	0.3	3.6	3
6073001600	24.39	48.63	45-50%	5651 San Diego	13.5	82	4.5	54	24.5	12.4	0.3	5.6	3.1
6065041805	24.39	48.62	45-50%	5799 Riverside	14.6	80.3	5.1	44.4	39.5	4.7	0.3	8.3	2.8
6037920313	24.39	48.61	45-50%	6010 Los Angeles	12.7	76.6	10.7	35.5	54.9	1.5	0.3	5.4	2.3
6067004001	24.38	48.59	45-50%	5755 Sacramento	10.3	65.9	23.8	18.1	36.1	13.9	0.7	26	5.2
6007003200	24.38	48.58	45-50%	4234 Butte	13.4	68.6	18	26.1	60.5	0.6	3.9	4.1	4.8
6037621204	24.37	48.57	45-50%	3230 Los Angeles	4.3	77.5	18.2	9.8	71.2	2.2	0.3	13.7	2.7
6029003306	24.36	48.56	45-50%	4897 Kern	10	72.7	17.3	17.6	76.5	0.9	1	1.6	2.3
6111004710	24.36	48.54	45-50%	5089 Ventura	16.8	73.6	9.6	70.6	11.6	2.5	0.2	13.4	1.8
6037139001	24.35	48.53	45-50%	4767 Los Angeles	13	73.7	13.3	17.9	66.1	4.6	0.2	6.7	4.6
6001423300	24.35	48.52	45-50%	3647 Alameda	10.7	74.5	14.8	14.9	36	33.8	0.3	9.1	5.9
6085504803	24.34	48.51	45-50%	5756 Santa Clara	14.4	75	10.6	17.3	25.7	2.3	0.2	51.5	3
6065044403	24.30	48.49	45-50%	4402 Riverside	10.7	72.8	16.5	30.2	60.7	0.5	5.1	1.1	2.4
6073010502	24.30	48.48	45-50%	5514 San Diego	16.8	76.7	6.5	58.5	27.8	4.5	0.3	5.7	3.3
6037800327	24.30	48.47	45-50%	5305 Los Angeles	10.7	78.3	11	16.4	71.9	1.9	0.1	6.7	3
6095250400	24.29	48.46	45-50%	3087 Solano	13.1	77.2	9.7	27	41.4	14.8	0.9	9.9	6.1
6059076201	24.28	48.44	45-50%	6772 Orange	11.3	78	10.7	28.4	50.6	2	0.1	16.9	2.1
6067009314	24.28	48.43	45-50%	5922 Sacramento	15.8	76.7	7.5	16.7	33	12.8	0.3	31.2	5.9
6013355107	24.28	48.42	45-50%	5048 Contra Costa	13	78.6	8.4	26.7	47.2	10.4	0.5	10.3	5
6071010019	24.28	48.40	45-50%	5235 San Bernardino	16	73.3	10.7	47.6	43.6	4.5	0.5	1.5	2.4
6037702201	24.27	48.39	45-50%	4483 Los Angeles	9.7	78.5	11.8	12.5	69	3.3	0.2	10.7	4.3
6037900704	24.27	48.38	45-50%	3050 Los Angeles	19.5	76.4	4.1	34.1	28.3	28.9	0.4	4.6	3.6
6037113303	24.27	48.37	45-50%	4006 Los Angeles	10.1	73.3	16.6	29.1	50.4	3.3	0.4	14.4	2.4
6037124000	24.27	48.35	45-50%	4550 Los Angeles	10.8	74.8	14.4	12.1	76.5	3.5	0.1	4.4	3.4
6085504506	24.26	48.34	45-50%	5924 Santa Clara	15.7	74.4	9.9	10.1	14.4	2.3	0.2	69.3	3.5
6037143602	24.25	48.33	45-50%	4260 Los Angeles	8.7	74.4	16.9	8.2	77.3	4.1	0.3	7.1	3.1
6059032022	24.25	48.32	45-50%	6833 Orange	12.9	78.4	8.7	45.8	43.3	1.5	0.2	6.3	2.8
6067005903	24.25	48.30	45-50%	2277 Sacramento	10.7	79.7	9.6	14.4	63.7	11.2	0.7	3.6	6.3
6111008302	24.24	48.29	45-50%	5380 Ventura	11.1	73.9	15	21.5	66.1	1.3	0.5	7.7	2.9
6013359102	24.24	48.28	45-50%	5159 Contra Costa	11.1	76.1	12.8	24.8	27.5	17.6	0.4	25	4.7
6071008500	24.24	48.27	45-50%	8316 San Bernardino	9.6	70.3	20.1	12.4	75.6	1.2	0.3	7.3	3.2
6037113232	24.24	48.25	45-50%	3894 Los Angeles	8.6	72.2	19.2	17.8	61.1	4	0.2	13.5	3.4
6013360101	24.24	48.24	45-50%	4576 Contra Costa	9.8	72.4	17.8	18.8	43.1	9.7	0.2	22.3	5.8
6023001101	24.24	48.23	45-50%	6350 Humboldt	9.5	79.5	11	9.1	79.9	1.5	2.4	1.7	5.3
6065050600	24.24	48.22	45-50%	6850 Riverside	11.4	78.5	10.1	23.3	66.1	3.2	0.4	4.1	2.9
6033001000	24.23	48.20	45-50%	6045 Lake	12	71.9	16.1	32.6	59.6	0.7	4.2	0.8	2.1
6041112100	24.23	48.19	45-50%	4315 Marin	11.8	76.8	11.4	26.1	64	1.5	0.2	4.7	3.5
6085504311	24.21	48.18	45-50%	7062 Santa Clara	14.5	76.3	9.2	7.7	8.1	1.7	0	80.3	2.1
6075011300	24.21	48.16	45-50%	3143 San Francisco	5.6	63.6	30.8	2.4	15.7	0.8	0	80	1.2
6037503802	24.20	48.15	45-50%	5054 Los Angeles	11.6	77	11.4	39.6	33.1	1.2	0.3	23.7	2.1
6001405800	24.20	48.14	45-50%	3965 Alameda	14	77.2	8.8	18.4	6.2	19.4	0.4	53.4	2.4
6059099202	24.20	48.13	45-50%	8323 Orange	13.5	77.8	8.7	54.2	11.1	0.8	0.4	32	1.5
6073013102	24.20	48.11	45-50%	6487 San Diego	15.1	74.1	10.8	75.4	14.6	4.3	0.4	3.7	1.6
6037124600	24.19	48.10	45-50%	3123 Los Angeles	11.6	75.1	13.3	15.5	69	4.3	0.1	7.7	3.3
6115040303	24.19	48.09	45-50%	6555 Yuba	19.3	74.1	6.6	28	46.5	5	0.9	14.9	4.7
6037700502	24.19	48.08	45-50%	4246 Los Angeles	1.4	86.9	11.7	9.9	78	3.3	0.1	5.9	2.8
6101050402	24.18	48.06	45-50%	3970 Sutter	17.6	70.6	11.8	20.3	56.6	2.3	0.4	16.7	3.8
6037920328	24.18	48.05	45-50%	1990 Los Angeles	10.8	83	6.2	13.3	68.1	4	0.3	10.7	3.7
6073013309	24.17	48.04	45-50%	7005 San Diego	12.9	75.4	11.7	56.6	22.7	2.7	0.2	14.2	3.6
6073015703	24.17	48.03	45-50%	7102 San Diego	16	72	12	28.9	54.1	6.5	0.2	3.9	6.3
6001435800	24.17	48.01	45-50%	5382 Alameda	13.2	76.3	10.5	37.9	29.8	4.6	0.3	24.3	3.1
6071009911	24.17	48.00	45-50%	6456 San Bernardino	15.6	76.1	8.3	46.3	33.2	12.3	0.6	4.8	2.9
6037137103	24.16	47.99	45-50%	4199 Los Angeles	8.8	78.7	12.5	11.7	61.4	5.8	0.3	16	4.8
6029005700	24.16	47.98	45-50%	2226 Kern	27.7	71.9	0.4	17.2	64.2	7.5	0.7	4.5	5.8
6001437702	24.16	47.96	45-50%	4256 Alameda	22.5	74.6	2.9	69.8	5.7	8.2	0.2	13	3.1
6059088901	24.15	47.95	45-50%	6725 Orange	11.4	76	12.6	17.1	13	0.8	0.1	67	2
6021010200	24.14	47.94	45-50%	4901 Glenn	14.5	69.7	15.8	32.1	63	0.4	1.2	1.2	2.1
6001423400	24.14	47.93	45-50%	4685 Alameda	10.9	79.5	9.6	15.8	41.1	25.1	0.2	10.9	7
6111007700	24.12	47.91	45-50%	5988 Ventura	14.8	74.7	10.5	34.6	50.4	1.3	0.3	10	3.4
6067007903	24.11	47.90	45-50%	4576 Sacramento	10	68	22	11.2	76	4.2	0.5	4.5	3.6
6059110301	24.11	47.89	45-50%	6729 Orange	11.2	76.7	12.1	28	34.8	3.8	0.2	30.4	2.7
6037575002	24.10	47.87	45-50%	4627 Los Angeles	8.7	77.6	13.7	26.3	46.1	9.7	0.3	13.4	4.1
6037609900	24.10	47.86	45-50%	2034 Los Angeles	11.6	70.6	17.8	55.3	29.7	6.4	0.4	5.3	2.9
6065045224	24.08	47.85	45-50%	5471 Riverside	15.9	74.6	9.5	59.3	35.8	1.2	0.2	2.3	1.1
6037183104	24.07	47.84	45-50%	2065 Los Angeles	11.3	74.7	14	52.3	22.5	2.6	0.2	19.9	2.5
6037143800	24.07	47.82	45-50%	4878 Los Angeles	10.3	74.8	14.9	7.3	79	3.7	0.1	6.4	3.4
6059099411	24.07	47.81	45-50%	5500 Orange	12.4	81.9	5.7	32.9	48.7	2.3	0.3	11.7	4
6073020206	24.07	47.80	45-50%	5217 San Diego	19	76	5	76.6	17.3	2.2	0.2	2.5	1.2
6037910404	24.06	47.79	45-50%	4130 Los Angeles	18.4	76.9	4.7	63	18.5	13.2	0.3	2.6	2.3
6085504700	24.05	47.77	45-50%	719 Santa Clara	28.3	70.9	0.8	22.9	49.5	13.8	1	7.1	5.7
6095252314	24.04	47.76	45-50%	4113 Solano	11.4	73.7	14.9	22.4	40.1	14.7	0.7	14.2	8
6071010424	24.02	47.75	45-50%	1966 San Bernardino	4.7	68.5	26.8	8.7	85.8	1.3	1.2	0.7	2.3
6073019002	24.02	47.74	45-50%	1759 San Diego	11	75.6	13.4	42.5	51.6	1	0.3	3.4	1.3
6037400800	24.01	47.72	45-50%	3967 Los Angeles	4.3	83.8	11.9	17.6	65.3	3	0.2	9.5	4.3
6085504504	24.01	47.71	45-50%	9882 Santa Clara	12.7	83.2	4.1	20.7	12.6	5.4	0.3	58.2	2.7
6059011711	24.00	47.70	45-50%	7305 Orange	13.3	79.4	7.3	48.7	31.6	2.9	0.3	13.9	2.7
6081601502	24.00	47.69	45-50%	5125 San Mateo	11.9	73.7	14.4	27.1	10.2	4.9	0.1	54.6	3.1
6095253204	24.00	47.67	45-50%	7098 Solano	16	77.1	6.9	36.1	47.3	6.2	0.4	5.8	4.2
6065050500	24.00	47.66	45-50%	13261 Riverside	17.9	76.6	5.5	30.7	42.5	7.5	0.4	14.2	4.8
6073019404	23.99	47.65	45-50%	3984 San Diego	18.4	76.4	5.2	80.7	14.8	0.7	0.2	1.7	1.8
6001409900	23.99	47.64	45-50%	3308 Alameda	8.8	70	21.2	8.1	26.8	53.1	0.2	7.6	4.3
6037272302	23.98	47.62	45-50%	4074 Los Angeles	10.6	77.9	11.5	50.1	33.9	4.6	0.3	8.8	2.4
6037401201	23.98	47.61	45-50%	3110 Los Angeles	11	76.1	12.9	25.7	61.5	1.6	0.3	8.2	2.7
6085504101	23.98	47.60	45-50%	4273 Santa Clara	14.1	78	7.9	63	14.3	1.9	1	18.2	1.5
6037702002	23.98	47.58	45-50%	5700 Los Angeles	6.1	82.6	11.3	11.9	74.4	4.5	0.4	5.4	3.5
6037571504	23.97	47.57	45-50%	4699 Los Angeles	11.9	79.3	8.8	28.9	27.9	21.2	0.2	18	3.7
6067009633	23.97	47.56	45-50%	3309 Sacramento	17.5	76.5	6	33.2	11.3	25.1	0.2	23.4	6.9
6073001800	23.95	47.55	45-50%	5319 San Diego	11.4	83.8	4.8	40	38.9	12.6	0.3	4.4	3.8
6031000701	23.95	47.53	45-50%	5321 Kings	13	73.6	13.4	28.8	63.1	2.3	0.6	2.8	2.4
6037910706	23.94	47.52	45-50%	6022 Los Angeles	18.9	76.6	4.5	69.3	10.9	14.5	0.2	3.4	1.8
6037920115	23.94	47.51	45-50%	4149 Los Angeles	13.4	79.5	7.1	15.3	63.5	2.9	0.2	15	3.1
6075060502	23.94	47.50	45-50%	3216 San Francisco	20.5	72.4	7.1	26.1	4.2	29.2	0.2	36.6	3.7
6071011500	23.93	47.48	45-50%	1890 San Bernardino	8.9	79	12.1	15.8	76	2.8	0.6	1	3.8
6065043222	23.93	47.47	45-50%	3842 Riverside	9.6	77	13.4	18	72.7	1.7	1.1	4.7	1.8
6037920037	23.92	47.46	45-50%	7131 Los Angeles	19.7	77.2	3.1	58.4	22	10.4	0.4	6	2.8
6107001501	23.91	47.45	45-50%	5258 Tulare	17	70	13	38.1	56.5	0.5	0.9	1.7	2.3
6071002016	23.91	47.43	45-50%	3883 San Bernardino	12.4	78.9	8.7	38	51.6	2.6	0.4	4.8	2.6
6013303204	23.91	47.42	45-50%	4182 Contra Costa	13.6	73	13.4	27.7	60	3.3	0.5	4.1	4.3
6087122500	23.91	47.41	45-50%	6670 Santa Cruz	17.1	75.1	7.8	76.4	17.4	0.6	0.3	3.5	1.8
6075020800	23.90	47.40	45-50%	6577 San Francisco	7	84.2	8.8	50.9	31	2.1	0.3	13.2	2.5
6053014800	23.89	47.38	45-50%	6112 Monterey	20	74.8	5.2	84.9	11.7	0.4	0.2	1.6	1.2
6073008360	23.89	47.37	45-50%	5857 San Diego	11.4	79.4	9.2	20	29.9	6.3	0.2	38.1	5.6
6037920102	23.89	47.36	45-50%	5668 Los Angeles	14.3	78	7.7	30.2	53.6	3.4	0.4	9.2	3.2
6073003201	23.88	47.35	45-50%	4932 San Diego	20.4	70.6	9	29.8	19.9	12	0.3	32.5	5.4
6073021000	23.87	47.33	45-50%	4440 San Diego	8.9	59.8	31.3	34.4	63.1	0.4	0.9	0.5	0.7
6097154201	23.86	47.32	45-50%	3925 Sonoma	13.2	74.7	12.1	43.4	52	0.7	1.7	0.9	1.5
6067004906	23.85	47.31	45-50%	2797 Sacramento	15.3	75.1	9.6	25.2	15.6	27.6	0.4	27.5	3.8
6071010409	23.85	47.29	45-50%	3018 San Bernardino	11.3	72.8	15.9	15.9	71	4.2	1.3	2.7	5

6037920043	23.85	47.28	45-50%	5711 Los Angeles	17.4	77.1	5.5	23.4	43.3	5.2	0.2	24.7	3.2
6045010400	23.84	47.27	45-50%	3467 Mendocino	11.3	74.2	14.5	25	69.1	0.3	1.2	1.3	3.1
6065044104	23.84	47.26	45-50%	2647 Riverside	12.3	75	12.7	40	49.9	4.2	1.2	2.8	1.9
6059110106	23.83	47.24	45-50%	3577 Orange	11.1	76.4	12.5	14.4	53.1	3.4	0	25.4	3.7
6085505303	23.83	47.23	45-50%	5940 Santa Clara	14.3	77.5	8.2	29.1	25.7	2.3	0.1	39.1	3.7
6085503211	23.82	47.22	45-50%	4744 Santa Clara	13.3	76.2	10.5	38.3	9.9	2.2	0.4	47.8	1.5
6037212502	23.82	47.21	45-50%	2767 Los Angeles	7.5	83.5	9	35.3	8.8	5	0.1	49.1	1.7
6071009708	23.81	47.19	45-50%	5221 San Bernardino	12.3	74.1	13.6	21.1	71.4	2.9	0.7	1.6	2.4
6037106111	23.81	47.18	45-50%	4334 Los Angeles	11.4	78.4	10.2	58.9	27.5	4.6	0.3	7.2	1.5
6001405301	23.80	47.17	45-50%	2603 Alameda	7	84.2	8.8	14.2	41.3	23.2	0.5	14.8	5.9
6073016100	23.80	47.16	45-50%	5788 San Diego	11.4	74.3	14.3	18.7	70.6	3.1	0.7	3.5	3.5
6029005401	23.80	47.14	45-50%	6099 Kern	12	70	18	16	72.9	2.5	0.9	4.9	2.8
6037501600	23.79	47.13	45-50%	7190 Los Angeles	10.4	77.1	12.5	50.3	38.8	1.7	0.2	7.4	1.7
6037460302	23.79	47.12	45-50%	4442 Los Angeles	12.3	77.1	10.6	42	16.8	33.8	0.2	3.2	4
6075012201	23.78	47.11	45-50%	4567 San Francisco	5.1	85.7	9.2	27.9	36.5	5.4	0.6	25.5	4.1
6037275101	23.78	47.09	45-50%	1177 Los Angeles	9.1	78.3	12.6	28.1	41.6	7.3	0.2	18.2	4.6
6113010310	23.78	47.08	45-50%	5485 Yolo	19.7	76.7	3.6	21.5	46.8	7.6	0.3	16.4	7.3
6073013000	23.78	47.07	45-50%	5903 San Diego	12.2	74.8	13	68.2	19.6	3.8	0.7	5.7	1.9
6059062627	23.78	47.06	45-50%	3308 Orange	5.2	72.2	22.6	8.2	45.3	1.4	0.1	40.2	4.8
6037461501	23.78	47.04	45-50%	3700 Los Angeles	12.8	76.8	10.4	52.1	23.8	14.6	0.2	6.2	3.1
6037278001	23.77	47.03	45-50%	2458 Los Angeles	11.7	76.8	11.5	25.5	49.3	8.5	0.1	12.4	4.3
6073010200	23.76	47.02	45-50%	6800 San Diego	10.9	79	10.1	33.7	52.6	4.6	0.6	5	3.5
6037405900	23.76	47.00	45-50%	4049 Los Angeles	12	77.5	10.5	57.3	27.5	4.1	0.2	9.1	1.8
6065042711	23.76	46.99	45-50%	4543 Riverside	1.4	35.6	63	13.3	76	6.2	0.5	2.2	1.7
6059099603	23.74	46.98	45-50%	6126 Orange	11.5	72.7	15.8	15.8	62.9	0.9	0.2	16.2	3.9
6097151201	23.74	46.97	45-50%	6855 Sonoma	10.4	77.5	12.1	19.6	71.9	1.2	0.8	2.8	3.7
6065044602	23.74	46.95	45-50%	2907 Riverside	7.2	67.8	25	23.8	66.4	2.8	0.8	4	2.2
6085503336	23.73	46.94	45-50%	3492 Santa Clara	14.2	78.2	7.6	36.9	7.2	2.5	0.6	51	1.8
6059075401	23.73	46.93	45-50%	3895 Orange	14.3	72.3	13.4	53.5	39	1.2	0.5	4.6	1.3
6021010300	23.73	46.92	45-50%	2373 Glenn	11.2	72.6	16.2	17.6	70.8	1.3	6.9	0.8	2.7
6037700200	23.73	46.90	45-50%	6321 Los Angeles	2.4	85.6	12	10.5	77.4	3.3	0.2	5	3.6
6013303102	23.72	46.89	45-50%	7624 Contra Costa	18.2	75.7	6.1	34.2	41.1	7.5	0.3	11.8	5.2
6037113213	23.72	46.88	45-50%	4316 Los Angeles	10.6	75.7	13.7	24	47.3	4.3	0.3	20.7	3.4
6059063603	23.72	46.87	45-50%	6223 Orange	7.4	76	16.6	15	76.3	1.1	0.2	4.6	2.7
6073010003	23.72	46.85	45-50%	5906 San Diego	12.2	71.9	15.9	64.7	11.5	3.5	0.2	17.3	2.7
6075022903	23.70	46.84	45-50%	3384 San Francisco	8.3	82.7	9	50.6	30.6	1.8	0.2	13.7	3.1
6075020900	23.68	46.83	45-50%	4372 San Francisco	6.6	84.3	9.1	50	33	1.5	0.3	11.9	3.2
6053001500	23.67	46.82	45-50%	5741 Monterey	11.3	70.4	18.3	37.7	50.7	1.4	0.4	7.2	2.6
6053011101	23.66	46.80	45-50%	5188 Monterey	20.1	72.4	7.5	86.7	10.4	0.4	0.2	0.8	1.4
6073014200	23.65	46.79	45-50%	6277 San Diego	13.9	74.2	11.9	42.9	35.4	10.4	0.3	7.5	3.5
6085503506	23.65	46.78	45-50%	6432 Santa Clara	17.2	75.5	7.3	67.8	3.5	2.2	0	25	1.5
6053014301	23.64	46.77	45-50%	3602 Monterey	11.8	76.8	11.4	22.5	43.1	6.5	0.3	21.2	6.4
6065049600	23.64	46.75	45-50%	7176 Riverside	19.7	70.7	9.6	23.9	53.6	4.9	0.2	13.4	4.1
6079010016	23.64	46.74	45-50%	4864 San Luis Obispo	13.7	73.7	12.6	31.5	63.2	1.5	1	0.8	2
6097152702	23.63	46.73	45-50%	5242 Sonoma	13.1	75.8	11.1	23.5	66.7	1.5	1.3	3.9	3.1
6053000101	23.63	46.71	45-50%	2079 Monterey	16.1	72.7	11.2	63.2	28	1	0.2	4.5	3.1
6019005905	23.63	46.70	45-50%	6809 Fresno	11.7	72.8	15.5	21.3	63	1	0.6	11.6	2.4
6059088203	23.63	46.69	45-50%	4819 Orange	14.8	73.6	11.6	34.9	24.5	1.6	0.4	36.9	1.6
6059086801	23.62	46.68	45-50%	3267 Orange	12.2	75.9	11.9	38.1	35.8	1.5	0.1	21.8	2.6
6073002707	23.62	46.66	45-50%	5369 San Diego	20.3	75.4	4.3	58.3	4.5	14.5	0.2	20.7	1.7
6065044606	23.62	46.65	45-50%	2852 Riverside	7.2	73.3	19.5	25.1	67.5	2.9	0.9	2	1.6
6021010100	23.61	46.64	45-50%	8192 Glenn	16	71.8	12.2	42.3	51.7	0.7	1	2.6	1.7
6085504507	23.61	46.63	45-50%	5768 Santa Clara	12.4	75.9	11.7	20.1	17.4	2.8	0.3	55.7	3.7
6071010411	23.61	46.61	45-50%	6752 San Bernardino	13.3	68.3	18.4	17.8	73.8	3.2	0.8	2.1	2.3
6095250300	23.61	46.60	45-50%	3206 Solano	12.7	72.7	14.6	23.8	31.1	19.1	0.6	20.3	5.1
6037575001	23.59	46.59	45-50%	3608 Los Angeles	10.9	83.2	5.9	23.6	41.5	11.2	0.5	18.1	5
6037403901	23.59	46.58	45-50%	3110 Los Angeles	12.6	76.2	11.2	47.1	39.7	2.7	0.2	8.1	2.2
6075022801	23.59	46.56	45-50%	5078 San Francisco	10.2	84	5.8	42.2	39.1	2.8	0.1	12	3.8
6059011716	23.59	46.55	45-50%	5410 Orange	14.1	75.7	10.2	26.3	36.1	1.9	0.1	33.4	2.2
6083002211	23.58	46.54	45-50%	5366 Santa Barbara	10.7	64.2	25.1	43.7	47.3	1	0.5	5.8	1.7
6059062612	23.58	46.53	45-50%	8186 Orange	8.2	75.4	16.4	6.9	56.6	1.1	0.1	30.3	5
6059001704	23.57	46.51	45-50%	7451 Orange	14.7	75.4	9.9	8.6	19.9	1	0	68.2	2.2
6013303203	23.56	46.50	45-50%	8491 Contra Costa	15.5	70.8	13.7	21.2	55.6	8.3	0.4	10	4.5
6037503401	23.56	46.49	45-50%	6529 Los Angeles	11.7	74.2	14.1	48.6	43.5	1	0.2	5.3	1.4
6067005204	23.55	46.47	45-50%	4220 Sacramento	10.7	67.9	21.4	16.7	66	5.4	0.6	7.4	3.9
6073010300	23.55	46.46	45-50%	4507 San Diego	13.2	74.2	12.6	46.9	38.1	2.9	0.4	7.1	4.5
6001442700	23.54	46.45	45-50%	2873 Alameda	12.5	71.5	16	16.8	53.3	1.6	0.2	22.5	5.6
6061021003	23.54	46.44	45-50%	6210 Placer	12.9	76.3	10.8	16.1	72.6	1.7	0.8	5.7	3.1
6111005502	23.54	46.42	45-50%	5127 Ventura	14.5	78.4	7.1	34.4	45.7	3.1	0.4	12.7	3.6
6073009000	23.53	46.41	45-50%	3861 San Diego	12.6	77.1	10.3	42.4	35.5	5	0.2	13.8	3.2
6073013702	23.53	46.40	45-50%	5357 San Diego	15.6	76.4	8	40.1	35.8	13.6	0.4	6.2	4
6001420400	23.52	46.39	45-50%	3124 Alameda	24.6	74.8	0.6	13.6	27.8	3.8	0.9	48.9	5
6097153902	23.51	46.37	45-50%	4147 Sonoma	14.3	74.6	11.1	49.8	46.9	0.3	0.9	0.7	1.3
6073014902	23.51	46.36	45-50%	3186 San Diego	11.5	75.7	12.8	22.1	66.3	3.6	0.4	3.6	3.9
6073012303	23.51	46.35	45-50%	3431 San Diego	9.8	67.9	22.3	45.3	40.4	4.8	0.2	6.8	2.4
6059001301	23.50	46.34	45-50%	6423 Orange	10.5	78.7	10.8	41.5	42.4	2.4	0.2	11.1	2.4
6001436100	23.50	46.32	45-50%	5261 Alameda	12.5	74.7	12.8	40.1	28	5.3	0.4	22.4	3.7
6053000501	23.49	46.31	45-50%	4842 Monterey	23.6	72.7	3.7	97.2	1.6	0.2	0.2	0.3	0.5
6037571900	23.49	46.30	45-50%	5509 Los Angeles	11.3	76.8	11.9	18.7	48.3	16.4	0.5	12	4.1
6001440336	23.49	46.29	45-50%	4459 Alameda	12.6	77.1	10.3	23.9	18	8	0.2	45	4.9
6029002804	23.48	46.27	45-50%	2672 Kern	3.9	39.8	56.3	15.8	76.9	2.5	0.4	2.3	2.1
6001432700	23.47	46.26	45-50%	2478 Alameda	11.4	72.5	16.1	21.2	47.9	9.8	0.4	16.5	4.1
6007001704	23.47	46.25	45-50%	3060 Butte	10.5	71.4	18.1	7.1	86.8	0.2	1.2	0.8	4
6113010302	23.46	46.24	45-50%	7270 Yolo	15.3	78.4	6.3	21	50.5	4.8	0.4	17.9	5.5
6073002708	23.45	46.22	45-50%	5689 San Diego	18.7	74.6	6.7	53.6	8	14.8	0.1	21	2.5
6037186202	23.44	46.21	45-50%	1974 Los Angeles	11	77.5	11.5	44.9	16	2	0.1	35.3	1.8
6029000907	23.44	46.20	45-50%	2463 Kern	19.2	73	7.8	66.4	27.2	3.7	1.3	0.6	0.9
6037189300	23.42	46.18	45-50%	3077 Los Angeles	10.3	71.5	18.2	5.9	76	2.3	0	13	2.7
6037214901	23.42	46.17	45-50%	3083 Los Angeles	4.3	78.9	16.8	5.1	78.8	2.9	0.1	7.9	5.3
6097152000	23.41	46.16	45-50%	2079 Sonoma	12.2	82.9	4.9	26	62	2.5	1.2	3.9	4.4
6075016802	23.40	46.15	45-50%	3264 San Francisco	4.5	89.9	5.6	13	58.8	11.1	0.7	11.8	4.5
6095253205	23.40	46.13	45-50%	3022 Solano	16.2	77.8	6	35.8	49	5.7	0.5	4.6	4.3
6085512311	23.40	46.12	45-50%	3314 Santa Clara	16	72.5	11.5	37	46.7	2.1	0.3	10.3	3.7
6001410000	23.39	46.11	45-50%	2805 Alameda	9.8	69.7	20.5	9.6	31	48.8	0.1	6.3	4.2
6013336202	23.39	46.10	45-50%	5701 Contra Costa	21.9	75.3	2.8	77.2	11.2	3.5	0.1	6.1	1.9
6037503502	23.38	46.08	45-50%	4130 Los Angeles	12.8	75.8	11.4	60.5	31.3	1	0.2	5.4	1.6
6001442900	23.38	46.07	45-50%	7194 Alameda	14.1	74.9	11	19.1	33.5	3.2	0.3	38.7	5.1
6071010417	23.37	46.06	45-50%	3251 San Bernardino	10.2	74.6	15.2	15.4	79	1	1	1.1	2.5
6053000102	23.37	46.05	45-50%	9054 Monterey	16.6	75.2	8.2	65.8	12	2	0.2	18.3	1.8
6065044102	23.36	46.03	45-50%	2841 Riverside	14.8	70.8	14.4	51.7	36.6	5.5	1.9	1.8	2.5
6037128602	23.36	46.02	45-50%	3189 Los Angeles	10.2	76.5	13.3	17.6	70.1	3.6	0	5.4	3.3
6059099413	23.35	46.01	45-50%	8230 Orange	11.1	69.2	19.7	16.3	62.6	0.8	0.2	16.8	3.3
6037109200	23.35	46.00	45-50%	2669 Los Angeles	11	76	13	37.7	37.7	3.5	0.2	18.2	2.7
6075020200	23.34	45.98	45-50%	6269 San Francisco	5.7	83.7	10.6	25.2	49.5	6	0.5	15.9	2.9
6101050401	23.34	45.97	45-50%	4783 Sutter	15.9	73.9	10.2	24	54.4	1.6	0.9	15	4
6055201003	23.34	45.96	45-50%	4389 Napa	18.9	73.9	7.2	18.2	22.6	8.8	0.3	45.8	4.2
6085506301	23.34	45.95	45-50%	5334 Santa Clara	10.8	77.3	11.9	23.5	41.1	5.2	0.2	25.7	4.3
6001451506	23.33	45.93	45-50%	3138 Alameda	17.2	75.1	7.7	33.8	51.1	4	0.4	6.5	4.1
6037461100	23.32	45.92	45-50%	4844 Los Angeles	13.7	75.7	10.6	39.2	26.3	25.4	0.2	5	3.9
6071009707	23.32	45.91	45-50%	5920 San Bernardino	7.6	50.4	42	17.9	69.1	5.3	0.5	5.1	2
6001440335	23.31	45.89	45-50%	6496 Alameda	16.5	78.1	5.4	8.5	11.5	4.7	0.1	69.3	5.9
6037265304	23.31	45.88	45-50%	3570 Los Angeles	0.4	98.7	0.9	14.8	45.2	2.1	0.2	32.9	4.7
6037403721	23.31	45.87	45-50%	4998 Los Angeles	12.1	75	12.9	52.9	31.7	3	0.2	10.2	2
6037113237	23.31	45.86	45-50%	3661 Los Angeles	9.2	73.3	17.5	16.1	56.8	5.2	0.2	17.8	3.9
6065045000	23.30	45.84	45-50%	3424 Riverside	11.3	72.2	16.5	46.4	48.6	1.8	0.3	1.3	1.5
6037570902	23.30	45.83	45-50%	3616 Los Angeles	12.9	76.2	10.9	26.4	53.8	6.2	0.5	9.4	3.7
6065046405	23.29	45.82	45-50%	3974 Riverside	13.5	76.6	9.9	37.2	54.3	2.1	0.9	2.9	2.7
6059099905	23.29	45.81	45-50%	3053 Orange	12.5	76.1	11.4	28.6	46.4	1.8	0.6	19.9	2.7
6037406101	23.29	45.79	45-50%	3139 Los Angeles	11.6	76.3	12.1	51.2	36.4	2.5	0.5	7.1	2.3
6037267404	23.27	45.78	45-50%	2806 Los Angeles	4.6	85.1	10.3	11	63.6	2.6	0	18.5	4.3
6085504422	23.26	45.77	45-50%	3672 Santa Clara	11.7	75	13.3	20.7	11.4	3.5	0.1	61.5	2.9
6005000500	23.26	45.76	45-50%	2995 Amador	9.8	68.4	21.8	9.4	85.5	0.4	1.3	0.8	2.6
6029000910	23.26	45.74	45-50%	9904 Kern	15.9	71.6	12.5	37.2	48.3	5.5	0.8	5.6	2.6

6065040703	23.26	45.73	45-50%	2780 Riverside	10.5	77.9	11.6	27.5	66.2	0.8	1	1.5	3.1
6059062626	23.25	45.72	45-50%	2773 Orange	4.6	91.6	3.8	9.6	34.5	1.8	0	49.5	4.6
6073018100	23.25	45.71	45-50%	5659 San Diego	10.3	77.4	12.3	20.7	70.4	1.8	0.6	3.2	3.2
6073003204	23.24	45.69	45-50%	3453 San Diego	11.8	73.1	15.1	51.5	31	2.8	0.5	11.9	2.3
6037403408	23.24	45.68	45-50%	6576 Los Angeles	9	78.2	12.8	19.7	7.8	4	0.1	66.1	2.2
6075031201	23.24	45.67	45-50%	6167 San Francisco	9.2	77.7	13.1	15.8	13.7	8.4	0.2	59.7	2.1
6111005403	23.22	45.66	45-50%	2694 Ventura	13	71.3	15.7	53.2	37.8	1.1	0.4	5.2	2.3
6073010010	23.22	45.64	45-50%	5510 San Diego	12.9	70.3	16.8	72.7	12.4	1.9	0.1	11.2	1.7
6037408628	23.21	45.63	45-50%	5103 Los Angeles	7.7	72	20.3	18.1	9.7	1.1	0	69.4	1.8
6037403802	23.21	45.62	45-50%	5553 Los Angeles	12.1	76.6	11.3	45.3	36.2	4.1	0.4	11.6	2.5
6059063903	23.21	45.60	45-50%	3957 Orange	12.5	74.7	12.8	36.4	43.1	1.1	0.1	16.5	2.8
6075026100	23.19	45.59	45-50%	6810 San Francisco	10.2	75.6	14.2	26.5	10.9	1.4	0.1	58.8	2.2
6073008509	23.17	45.58	45-50%	6647 San Diego	10.7	75.7	13.6	19.1	55.2	7.5	0.5	12.6	5.1
6085505001	23.15	45.57	45-50%	9741 Santa Clara	15.1	78.7	6.2	15.4	22.4	2.8	0.1	55.5	3.8
6095250103	23.15	45.55	45-50%	4292 Solano	11.7	73.4	14.9	17.3	26.9	20.1	0.5	30.2	5
6059042310	23.15	45.54	45-50%	8391 Orange	12.5	73.2	14.3	35.6	59	0.4	0.5	2.2	2.3
6037462202	23.15	45.53	45-50%	2928 Los Angeles	10.2	84	5.8	11.1	46.1	6.2	0.1	32.4	4
6059001705	23.15	45.52	45-50%	4343 Orange	12.7	74.4	12.9	39.9	35.2	2.1	0.2	19.5	3
6037276000	23.15	45.50	45-50%	5396 Los Angeles	10.6	73.3	16.1	17.5	63.6	3.5	0.1	10.7	4.5
6081611700	23.14	45.49	45-50%	5970 San Mateo	16.9	75.6	7.5	68.6	3.6	17.9	0	8.2	1.7
6073018601	23.14	45.48	45-50%	4779 San Diego	15	76.8	8.2	27.9	53	2.7	0.4	11.4	4.6
6095253404	23.14	45.47	45-50%	6611 Solano	16.4	76.6	7	39.4	48.8	3.8	0.4	3.9	3.6
6073002903	23.14	45.45	45-50%	3717 San Diego	14.4	74.9	10.7	36.5	40.3	9.1	0.3	10.4	3.4
6037462301	23.14	45.44	45-50%	4655 Los Angeles	13.3	78.2	8.5	52	22.6	12.1	0.2	10.2	3
6085506501	23.13	45.43	45-50%	7710 Santa Clara	17.9	75.4	6.7	52	24.9	5.8	0.2	14.7	2.6
6037702901	23.12	45.42	45-50%	8866 Los Angeles	4.9	81.7	13.4	7.7	74.7	5.1	0.2	8.4	3.8
6013307204	23.11	45.40	45-50%	4300 Contra Costa	13.4	73.9	12.7	40	40.2	9	0.6	6.6	3.6
6111004000	23.11	45.39	45-50%	6586 Ventura	17.7	72.6	9.7	85.2	7.9	1.4	0.2	4.5	0.7
6037403702	23.08	45.38	45-50%	3794 Los Angeles	9.6	74.1	16.3	40.1	41.9	3.3	0.2	11.8	2.7
6065043010	23.08	45.37	45-50%	5687 Riverside	16.2	77.8	6	46.3	43.7	4.1	0.3	3	2.6
6077004701	23.08	45.35	45-50%	2757 San Joaquin	13.6	72	14.4	30.4	64.7	0.3	0.4	1.3	2.8
6059021915	23.07	45.34	45-50%	3985 Orange	8.2	70.3	21.5	14.2	61	1.2	0.1	20.1	3.5
6037554519	23.07	45.33	45-50%	3613 Los Angeles	7.6	69.4	23	9	17.9	4.2	0.1	66.4	2.4
6107000100	23.06	45.31	45-50%	5142 Tulare	9.7	71	19.3	23.3	71.9	0.4	1.1	1.4	2
6061020806	23.05	45.30	45-50%	3494 Placer	11.5	70.3	18.2	19.2	74.5	1.1	0.7	1.7	2.8
6097152801	23.05	45.29	45-50%	5547 Sonoma	12.3	79.9	7.8	21	66.3	1.6	1	5.8	4.3
6067007701	23.04	45.28	45-50%	6126 Sacramento	12.2	74	13.8	14.7	68.2	6.6	0.8	5.8	4
6065042717	23.04	45.26	45-50%	5079 Riverside	18.3	76	5.7	49.5	43.6	2.5	0.5	1.7	2.4
6075015801	23.04	45.25	45-50%	3594 San Francisco	9.5	77.8	12.7	11.1	38	28.2	0.3	18.2	4.1
6073003108	23.03	45.24	45-50%	3520 San Diego	15.6	74.5	9.9	55.1	23.2	8.1	0.3	9.4	3.9
6065041807	23.03	45.23	45-50%	2400 Riverside	12.9	78.2	8.9	48.6	43.8	2	0.2	3.2	2.1
6111000400	23.02	45.21	45-50%	6758 Ventura	15.7	73	11.3	76.2	22.3	0.1	0.3	0.4	0.7
6065043239	23.02	45.20	45-50%	6792 Riverside	9.8	75.1	15.1	19.7	74	1	0.6	2.4	2.2
6073014500	23.00	45.19	45-50%	3749 San Diego	14.1	73	12.9	31	43.9	11.8	0.7	8.9	3.6
6013304001	22.99	45.18	45-50%	3718 Contra Costa	16.4	73.4	10.2	17.1	55.3	6.8	0.1	15.4	5.3
6053000300	22.99	45.16	45-50%	4177 Monterey	16	73.1	10.9	66.1	21.3	1.9	0.2	7.6	2.9
6059088904	22.99	45.15	45-50%	5766 Orange	11.4	75.6	13	9	10.8	0.3	0.1	77.9	1.9
6037408625	22.98	45.14	45-50%	4160 Los Angeles	9.5	72.2	18.3	33.8	20.5	0.8	0	43.4	1.5
6059110110	22.97	45.13	45-50%	5706 Orange	12.5	78.2	9.3	32.1	33.9	4	0.2	26.6	3.2
6073020309	22.97	45.11	45-50%	3945 San Diego	16.3	76.2	7.5	42.6	40.1	1.4	0.8	11.6	3.5
6095253108	22.96	45.10	45-50%	4088 Solano	13.4	77.3	9.3	25	53.3	7.8	0.8	7.5	5.6
6037462700	22.96	45.09	45-50%	5471 Los Angeles	10.5	79.1	10.4	35.7	35.9	6.4	0.4	18.4	3.2
6111005004	22.96	45.08	45-50%	5419 Ventura	19	78	3	58.6	25	3	0.2	10.3	3
6097153006	22.95	45.06	45-50%	7286 Sonoma	12.8	72.8	14.4	29	60.7	1.6	0.7	4.8	3.2
6111007612	22.95	45.05	45-50%	4762 Ventura	14.1	77.6	8.3	39.1	50.6	1.9	0.1	5.4	2.9
6037300800	22.93	45.04	45-50%	6947 Los Angeles	10.2	73.5	16.3	12.3	67.3	1.1	0.1	15.8	3.4
6065043271	22.92	45.02	45-50%	3930 Riverside	14.6	76.5	8.9	41.5	51.4	1.9	0.6	2	2.6
6007002200	22.92	45.01	45-50%	5156 Butte	8.7	68.4	22.9	7.3	87.9	0.4	0.6	1.3	2.6
6053000701	22.91	45.00	40-45%	6439 Monterey	24.2	72.3	3.5	95.3	2.5	0.6	0.3	0.7	0.7
6037216800	22.91	44.99	40-45%	3289 Los Angeles	11	78.2	10.8	18.2	63.6	8.8	0.1	6	3.4
6085512043	22.91	44.97	40-45%	6129 Santa Clara	19.1	74.8	6.1	63.4	10.5	5.3	0.1	19.1	1.6
6071011101	22.91	44.96	40-45%	3771 San Bernardino	11.5	76.5	12	14.1	78.8	1	0.4	1.8	4
6065043314	22.91	44.95	40-45%	3631 Riverside	15.1	73.8	11.1	33.4	59.2	2.4	1.3	1.4	2.3
6037141101	22.90	44.94	40-45%	4066 Los Angeles	8.3	81.7	10	12.1	71.1	4.8	0.3	7.6	4.2
6009000210	22.90	44.92	40-45%	9515 Calaveras	10.2	72.7	17.1	13.3	79.5	1.1	0.9	1.8	3.5
6073008507	22.90	44.91	40-45%	7627 San Diego	10.8	76	13.2	26.9	50	3.9	0.2	15	4
6073020017	22.89	44.90	40-45%	3282 San Diego	15.4	74.7	9.9	47.7	38.6	3	0.7	6.7	3.1
6059001504	22.89	44.89	40-45%	4605 Orange	12.7	77.3	10	39.8	41.4	1.7	0.2	14.3	2.6
6001443001	22.88	44.87	40-45%	2917 Alameda	14	77.7	8.3	35.1	28.3	3	0.2	30.7	2.6
6071010018	22.88	44.86	40-45%	7068 San Bernardino	17.2	74.7	8.1	49.4	36.4	6.8	0.6	4.7	2
6037501700	22.88	44.85	40-45%	3695 Los Angeles	12.9	73.6	13.5	57.5	37	0.6	0.3	3.2	1.3
6029000906	22.88	44.84	40-45%	4355 Kern	19.3	72.6	8.1	69.2	23.1	4	1.2	1.2	1.2
6037650401	22.86	44.82	40-45%	4472 Los Angeles	12.3	74.2	13.5	14.6	46.3	1	0.3	32.7	5
6085503507	22.86	44.81	40-45%	2182 Santa Clara	17.5	75.2	7.3	78	1.6	2.8	0.3	16.1	1.1
6001435900	22.85	44.80	40-45%	5073 Alameda	10.7	73.9	15.4	28.4	36.7	4.4	0.2	27.3	3.1
6071008710	22.85	44.78	40-45%	4442 San Bernardino	15	67.1	17.9	39	55.5	1	0.7	1.7	2.2
6083002102	22.85	44.77	40-45%	2084 Santa Barbara	14.3	72.5	13.2	52.2	40.9	0.8	0.5	2.9	2.6
6001444100	22.84	44.76	40-45%	7280 Alameda	11.1	70.5	18.4	28.8	39.9	3.2	0.1	22.9	5.1
6087110600	22.84	44.75	40-45%	8349 Santa Cruz	17.4	73	9.6	83.3	11.2	0.5	0.2	3.7	1.1
6065043304	22.83	44.73	40-45%	6816 Riverside	9	69.5	21.5	19.6	72.8	1.4	0.7	3.7	1.8
6037192300	22.82	44.72	40-45%	2799 Los Angeles	7.1	77.7	15.2	7.9	66.9	4.1	0	17.4	3.7
6037113322	22.81	44.71	40-45%	3947 Los Angeles	9.2	71.6	19.2	19.3	54.8	3.7	0.1	18.8	3.3
6055200501	22.80	44.70	40-45%	5013 Napa	16.2	75.6	8.2	54.2	41.7	0.2	0.6	1.4	1.9
6081606100	22.79	44.68	40-45%	4246 San Mateo	15.2	75.5	9.3	41.3	29.8	2.5	0.1	21.8	4.5
6073000900	22.79	44.67	40-45%	5178 San Diego	6.6	81.3	12.1	29.6	51.8	7.7	0.4	6.8	3.7
6037900201	22.77	44.66	40-45%	1261 Los Angeles	13.1	72.2	14.7	39.7	52.7	2.8	0.7	1.3	2.8
6073013310	22.77	44.65	40-45%	28960 San Diego	16.8	76.9	6.3	44.4	16.9	5.7	0.2	28.9	3.9
6085509304	22.76	44.63	40-45%	2871 Santa Clara	11.9	81.3	6.8	28.7	40.3	2.9	0	24.5	3.6
6019005513	22.75	44.62	40-45%	2952 Fresno	13.3	76.6	10.1	15.8	68.7	2.3	0.8	10	2.4
6059052502	22.75	44.61	40-45%	5913 Orange	11.5	73.4	15.1	24.1	51.6	1.4	0	20.1	2.7
6073016201	22.74	44.60	40-45%	5843 San Diego	10.9	70.6	18.5	12.9	78	1.7	0.2	4.1	3.2
6095252903	22.74	44.58	40-45%	4368 Solano	9	74.6	16.4	17.6	73.9	1.6	0.3	2.9	3.7
6037311300	22.74	44.57	40-45%	3811 Los Angeles	12.1	74.5	13.4	25	60	1.8	0.5	10.3	2.5
6037702700	22.74	44.56	40-45%	3440 Los Angeles	12.8	72.6	14.6	20.9	57.8	2.3	0.1	14.5	4.4
6065043009	22.74	44.55	40-45%	4736 Riverside	15.5	78.4	6.1	43.3	44.9	3.8	0.6	4.2	3
6101050301	22.73	44.53	40-45%	2403 Sutter	12.3	71.4	16.3	23.3	63.4	1.1	0.8	7.4	3.9
6075012100	22.73	44.52	40-45%	3833 San Francisco	1.9	90.6	7.5	13	50.1	4.6	0.9	26.4	5
6081610100	22.71	44.51	40-45%	2484 San Mateo	14.5	79.7	5.8	47.8	39.8	1.8	0.2	7.9	2.6
6037403404	22.69	44.49	40-45%	2521 Los Angeles	7.1	78.7	14.2	13.8	16.1	3	0	64.4	2.7
6073013908	22.68	44.48	40-45%	3708 San Diego	16.1	74.4	9.5	56.8	20.9	11.1	0.3	7.7	3.1
6039000509	22.67	44.47	40-45%	5935 Madera	11.6	76.9	11.5	26.3	67.6	1	0.9	2.4	1.8
6037101110	22.67	44.46	40-45%	4731 Los Angeles	9.7	80.2	10.1	28	56.1	1.6	0.3	10.4	3.7
6059088002	22.67	44.44	40-45%	3936 Orange	12.9	74.6	12.5	28.5	31.7	0.9	0.1	36.6	2.3
6037273902	22.67	44.43	40-45%	4227 Los Angeles	7.5	81	11.5	9.1	79.9	3	0.1	4.6	3.4
6071010024	22.65	44.42	40-45%	5359 San Bernardino	13.4	74.8	11.8	32.7	61.8	2.3	0.3	1.3	1.5
6111008202	22.63	44.41	40-45%	4353 Ventura	12.9	77.5	9.6	27.8	59.4	1.5	0.3	8.2	2.8
6059075507	22.63	44.39	40-45%	5187 Orange	13.3	79.5	7.2	49.8	29.2	2.9	0.3	15.1	2.7
6037571502	22.63	44.38	40-45%	4661 Los Angeles	12.4	76.1	11.5	32.7	23.1	17.9	0.3	21.6	4.5
6037481713	22.63	44.37	40-45%	2507 Los Angeles	7.1	77.7	15.2	14.6	2.7	0.3	0	81.9	0.5
6081600900	22.62	44.36	40-45%	3933 San Mateo	11.1	71.3	17.6	8.7	38.3	1	0.1	48.3	3.6
6083002209	22.58	44.34	40-45%	3321 Santa Barbara	17.7	74.8	7.5	73.7	20	0.8	0.4	3.6	1.5
6073019501	22.57	44.33	40-45%	4147 San Diego	22.8	74.3	2.9	86.4	8.1	1.3	0.5	2.2	1.4
6037201302	22.57	44.32	40-45%	3732 Los Angeles	8.9	75.1	16	24.9	26	7	0.2	39.1	2.8
6037700801	22.57	44.31	40-45%	5220 Los Angeles	7.2	68.5	24.3	4.7	79.6	2.3	0	8.2	5.3
6071008706	22.56	44.29	40-45%	12298 San Bernardino	15.3	72.6	12.1	22.8	65.9	2.2	0.3	6	2.8
6067005404	22.55	44.28	40-45%	5611 Sacramento	9	67.2	23.8	10.3	75.1	2.8	0.3	8.4	3.1
6085509108	22.54	44.27	40-45%	4281 Santa Clara	12.2	81.1	6.7	26.5	37.4	4.2	0.2	27.5	4.2
6073010001	22.53	44.26	40-45%	4097 San Diego	12.5	73.6	13.9	62.8	12.2	3.4	0	18.4	3.2
6073002803	22.53	44.24	40-45%	5370 San Diego	9.4	75	15.6	24.1	45.5	10.6	0.3	16.1	3.4
6067008128	22.51	44.23	40-45%	2462 Sacramento	13.7	71.4	14.9	18.3	72.5	2.4	0.6	3.7	2.5
6019005605	22.50	44.22	40-45%	1470 Fresno	10.8	73.8	15.4	22.9	63.5	2.2	0.6	8.3	2.4
6083002703	22.49	44.20	40-45%	4165 Santa Barbara	15.2	71.9	12.9	51.5	38.8	3.8	1.1	2.5	2.3
6071025000	22.49	44.19	40-45%	8850 San Bernardino	24.9	74.9	0.2	25.6	51.6	11.4	0.8	5.5	5.1

6073009306	22.49	44.18	40-45%	5589 San Diego	11.9	78.2	9.9	16.4	56.5	7	0.6	13.8	5.6
6001451401	22.49	44.17	40-45%	5850 Alameda	11.6	77.5	10.9	22.2	62	2.5	0.2	9.9	3.3
6083001102	22.48	44.15	40-45%	4740 Santa Barbara	16.7	78.9	4.4	75.1	20.3	1.2	0.3	1.9	1.2
6037267901	22.48	44.14	40-45%	2428 Los Angeles	3.6	45.8	50.6	3.6	82.8	0.9	0.1	10.4	2.1
6071002023	22.47	44.13	40-45%	5118 San Bernardino	11.9	71	17.1	34.8	46.4	9.1	0.3	6.1	3.3
6037900505	22.47	44.12	40-45%	4002 Los Angeles	17.5	75	7.5	36.7	34.4	22.6	0.2	2.9	3.2
6037103102	22.47	44.10	40-45%	4751 Los Angeles	10.2	77.5	12.3	28.4	55.7	0.6	0.3	12.4	2.6
6069000600	22.47	44.09	40-45%	8317 San Benito	15.6	76.1	8.3	48.9	43	0.8	0.5	4.4	2.4
6037276500	22.46	44.08	40-45%	5063 Los Angeles	3.8	91	5.2	18.4	60.5	4.7	0.1	10.2	6.1
6037123902	22.46	44.07	40-45%	2561 Los Angeles	9.8	80.2	10	29.6	51.3	4.8	0.3	10.8	3.2
6059075815	22.45	44.05	40-45%	5176 Orange	13.6	75.5	10.9	41.5	49.4	0.9	0.3	6.2	1.8
6045010700	22.45	44.04	40-45%	6203 Mendocino	13.7	71.8	14.5	20.2	70.6	0.6	4.3	1.3	3
6037214502	22.44	44.03	40-45%	5528 Los Angeles	11	82.4	6.6	6.5	43.2	6	0.1	41.1	3.1
6037503701	22.44	44.02	40-45%	4717 Los Angeles	13	74.4	12.6	51.7	39.5	1.7	0.3	4.9	1.9
6071010004	22.43	44.00	40-45%	8437 San Bernardino	11.2	70.4	18.4	18.2	68.8	4.7	0.4	4.6	3.3
6109005201	22.43	43.99	40-45%	1778 Tuolumne	8.9	71.8	19.3	13.3	78.5	2.5	1.7	0.8	3.3
6075022901	22.42	43.98	40-45%	4640 San Francisco	10.7	82.6	6.7	60.1	24.5	4.5	0.1	8	2.8
6037214501	22.41	43.97	40-45%	2932 Los Angeles	10.6	80	9.4	7.9	56	4.9	0.1	27.7	3.3
6059099230	22.40	43.95	40-45%	4358 Orange	10.8	74.7	14.5	10.9	67.6	0.7	0.1	16.5	4.2
6073010106	22.40	43.94	40-45%	5200 San Diego	13.1	76.4	10.5	86.9	6.7	1.5	0.1	3.9	1
6097150601	22.40	43.93	40-45%	4089 Sonoma	14.5	74.3	11.2	32.9	57.2	2.3	0.3	5.1	2.2
6007002602	22.39	43.91	40-45%	3455 Butte	7.2	59.7	33.1	7.5	85	0.7	1.5	2.3	3
6037135113	22.39	43.90	40-45%	2795 Los Angeles	11.9	77.8	10.3	13.6	52.5	9.4	0.4	19.1	5
6065042214	22.39	43.89	40-45%	6316 Riverside	11.5	80.4	8.1	39.5	36.9	11.6	0.3	8.3	3.3
6001431200	22.39	43.88	40-45%	5627 Alameda	10.6	72.9	16.5	23.4	49.4	10.9	0.3	12.2	3.8
6073008600	22.39	43.86	40-45%	6864 San Diego	15.2	75.5	9.3	51.4	19.7	4.9	0.3	20.7	3.1
6073015404	22.39	43.85	40-45%	7626 San Diego	13.8	72.2	14	18.8	68.8	3.8	0.4	2.1	6.1
6073013401	22.39	43.84	40-45%	4203 San Diego	10.2	73	16.8	52.1	39	0.8	0.3	5.3	2.5
6107002700	22.38	43.83	40-45%	5615 Tulare	10.9	69.1	20	17.1	64.5	0.6	14	1.7	2.2
6001422900	22.38	43.81	40-45%	4336 Alameda	2.8	93.3	3.9	11.2	37.1	8.6	0.2	37.1	5.8
6073018906	22.37	43.80	40-45%	6033 San Diego	16.1	73	10.9	50.1	42.8	2.5	0.3	2.3	2
6053010605	22.36	43.79	40-45%	4219 Monterey	20.2	77	2.8	90.2	2.8	1	0.3	4.5	1.2
6065042003	22.35	43.78	40-45%	5525 Riverside	12.1	77.1	10.8	27.7	54	5.9	0.2	8.7	3.5
6019005509	22.34	43.76	40-45%	4678 Fresno	14.3	73.2	12.5	22.5	55.9	3	0.4	15.5	2.7
6007003502	22.34	43.75	40-45%	4758 Butte	15.9	70.1	14	50.9	42.7	0.3	0.9	3.2	2
6085502101	22.30	43.74	40-45%	4798 Santa Clara	11.5	74.5	14	23.7	52	3.5	0.2	16.9	3.7
6073018904	22.30	43.73	40-45%	5640 San Diego	16.7	71.2	12.1	53.3	42	0.9	0.5	1.6	1.7
6037702300	22.30	43.71	40-45%	6364 Los Angeles	8.8	76	15.2	15.2	66.6	2.7	0.3	11.2	3.9
6037480400	22.30	43.70	40-45%	5654 Los Angeles	9.2	74.1	16.7	29.7	23.9	1.9	0.1	42	2.5
6013313203	22.29	43.69	40-45%	3222 Contra Costa	13.4	79.1	7.5	39.7	28.1	8.8	0.4	18.4	4.7
6065043227	22.29	43.68	40-45%	7051 Riverside	15.7	78.5	5.8	27.6	50.8	6.7	0.4	10.8	3.8
6073018400	22.29	43.66	40-45%	3566 San Diego	11	75.7	13.3	37.5	48.7	4.1	0.6	6.2	2.9
6113010901	22.28	43.65	40-45%	5311 Yolo	15.5	72.9	11.6	56.7	36.7	0.9	1	2.9	1.8
6019005911	22.28	43.64	40-45%	3386 Fresno	18.7	72.7	8.6	24.1	53	1.5	0.4	18.2	3
6001440334	22.28	43.62	40-45%	4016 Alameda	10.6	74.7	14.7	16.4	13.4	7.4	0.2	56.8	5.9
6059032027	22.27	43.61	40-45%	6328 Orange	15.5	80.4	4.1	39	43.4	1	0.4	13.2	3
6111008401	22.27	43.60	40-45%	5308 Ventura	11.5	74.8	13.7	23.1	66.3	1	0.2	7	2.4
6077004800	22.26	43.59	40-45%	5423 San Joaquin	13.9	73.9	12.2	33.1	62.2	0.6	0.5	1.6	2
6085512026	22.25	43.57	40-45%	3871 Santa Clara	15	76.3	8.7	34.1	29.4	5.7	0.3	25.4	5.1
6097153103	22.24	43.56	40-45%	4716 Sonoma	18	76.4	5.6	59.2	29.9	1.9	1.3	5.2	2.5
6079010603	22.23	43.55	40-45%	1287 San Luis Obispo	7.7	61.5	30.8	13.2	79.6	0.3	1.4	4	1.6
6089010400	22.23	43.54	40-45%	4417 Shasta	11.7	74.4	13.9	9.2	81.8	1.5	2.2	1.3	4
6085501300	22.23	43.52	40-45%	4153 Santa Clara	8.3	86.9	4.8	26.5	49	4.8	0.4	15.3	3.9
6029005508	22.23	43.51	40-45%	4198 Kern	16.4	73.1	10.5	25.9	48.6	17.9	0.6	2.1	5
6095252610	22.23	43.50	40-45%	3142 Solano	13.3	72.2	14.5	25.9	34.5	20.3	0.5	12	6.7
6071000117	22.22	43.49	40-45%	6959 San Bernardino	10.7	81.2	8.1	20.1	33.3	4.1	0.2	39.7	2.6
6059110111	22.22	43.47	40-45%	5736 Orange	11.9	75.6	12.5	19.4	41.8	4.2	0.3	30.9	3.4
6111000800	22.22	43.46	40-45%	7788 Ventura	14.4	73.1	12.5	64.8	32.4	0.6	0.4	0.8	1
6049000100	22.22	43.45	40-45%	3518 Modoc	13	70.2	16.8	12	81.2	0.5	2.2	1.6	2.5
6075012000	22.21	43.44	40-45%	3833 San Francisco	2.8	85.5	11.7	15.1	46.5	4.3	0.3	28.8	5
6037275400	22.21	43.42	40-45%	3349 Los Angeles	8.8	83.1	8.1	20.1	58	3.4	0.2	13.9	4.5
6111005202	22.20	43.41	40-45%	2694 Ventura	10.4	72	17.6	22.8	69.3	1.1	0.3	4.4	2.1
6053011203	22.20	43.40	40-45%	7173 Monterey	21.8	73.3	4.9	93.4	4.6	0.5	0.3	0.6	0.6
6019004213	22.19	43.39	40-45%	3248 Fresno	13.5	77.2	9.3	35.3	49.8	7.2	0.5	4	3.2
6093000702	22.18	43.37	40-45%	4406 Siskiyou	14.4	65.6	20	11.1	75.1	0.5	7.2	1	5.1
6075010600	22.17	43.36	40-45%	3894 San Francisco	4.9	77.1	18	6.5	34.2	1.4	0.1	55.3	2.5
6001442302	22.17	43.35	40-45%	4788 Alameda	15.6	74.1	10.3	21.2	24.1	8	0.4	40.4	5.9
6059110201	22.16	43.33	40-45%	7483 Orange	11.3	72	16.7	29.4	33.5	4.5	0.4	29	3.2
6037301100	22.16	43.32	40-45%	6491 Los Angeles	10.4	71.3	18.3	12.5	71.1	0.8	0.1	11.9	3.7
6073015704	22.16	43.31	40-45%	4024 San Diego	15.4	76.5	8.1	31.8	53.9	6.4	0.4	3.4	4.2
6059001707	22.15	43.30	40-45%	7482 Orange	10.6	77.5	11.9	10.9	20.8	1.8	0.1	64.2	2.2
6083001101	22.14	43.28	40-45%	4738 Santa Barbara	14.8	78.1	7.1	59.7	35.1	0.9	0.5	1.9	1.9
6065043802	22.14	43.27	40-45%	5116 Riverside	11.3	71.5	17.2	26.3	69.1	0.7	0.9	1.2	1.9
6037554515	22.13	43.26	40-45%	3703 Los Angeles	10.3	69.6	20.1	16	17.3	6	0	57.4	3.3
6019005510	22.13	43.25	40-45%	4997 Fresno	9.5	67.4	23.1	17.5	67.2	3.7	0.4	8.2	2.9
6071009119	22.13	43.23	40-45%	5729 San Bernardino	12.6	77.9	9.5	30.5	61.3	2.7	0.5	2.3	2.7
6067008111	22.13	43.22	40-45%	6153 Sacramento	11.2	74.6	14.2	12.7	78.6	1.9	0.7	2.8	3.3
6065042008	22.12	43.21	40-45%	7082 Riverside	12.3	77.8	9.9	33.5	54	5.1	0.3	5	2.2
6111002700	22.12	43.20	40-45%	3881 Ventura	10.6	70	19.4	24.4	68.5	1.1	0.4	2.3	3.3
6081610700	22.11	43.18	40-45%	5207 San Mateo	13	73.7	13.3	43.4	40.4	5	0.3	7.4	3.6
6067008912	22.10	43.17	40-45%	3100 Sacramento	12.1	75.9	12	13.7	66.7	6.2	0.7	7.3	5.4
6037570003	22.10	43.16	40-45%	4447 Los Angeles	12.8	76.5	10.7	32.3	41.1	8.5	0.3	14.5	3.4
6085503327	22.09	43.15	40-45%	4712 Santa Clara	12.6	73.7	13.7	33.2	19.9	2.8	0.1	41.3	2.8
6037273300	22.08	43.13	40-45%	3695 Los Angeles	9.5	85.1	5.4	32.8	49.5	10.3	0.2	3.3	3.8
6037139200	22.07	43.12	40-45%	5175 Los Angeles	11.9	75.2	12.9	17.6	65.6	4.6	0.1	7.5	4.7
6037900900	22.07	43.11	40-45%	3813 Los Angeles	11.8	73.6	14.6	25	60.9	7.5	0.7	3.2	2.6
6037900803	22.06	43.09	40-45%	8284 Los Angeles	17.6	75	7.4	38.8	32	20.9	0.5	4.5	3.4
6059110104	22.04	43.08	40-45%	6024 Orange	10.7	73.7	15.6	14.5	40.3	2.6	0.3	39.3	2.9
6071000817	22.04	43.07	40-45%	3264 San Bernardino	10.1	74.1	15.8	28	53.9	5.9	0.2	9	2.9
6095252704	22.04	43.06	40-45%	5155 Solano	14.2	76.6	9.2	27.7	28.2	20	0.2	16.8	7.1
6037910002	22.04	43.04	40-45%	7217 Los Angeles	14	76.4	9.6	56.8	35.5	3.8	0.4	1.2	2.3
6085505007	22.03	43.03	40-45%	4083 Santa Clara	11.9	72.6	15.5	22.9	25.1	3.5	0.6	44.2	3.7
6073003212	22.02	43.02	40-45%	4053 San Diego	11.8	71.8	16.4	44.9	15.8	10.9	0.1	24.4	3.9
6067007208	22.02	43.01	40-45%	4495 Sacramento	14.8	75	10.2	23	65.7	2.1	0.9	4.6	3.8
6037555202	22.01	42.99	40-45%	3399 Los Angeles	11.3	71.8	16.9	19.1	59.7	5.6	0.1	11.3	4.2
6053011400	22.00	42.98	40-45%	3778 Monterey	12	76.7	11.3	29.5	62.2	1.9	1.3	2.3	2.8
6073003109	21.99	42.97	40-45%	3358 San Diego	10.1	78.1	11.8	10	5.7	7.2	0.1	74	2.9
6037143100	21.98	42.96	40-45%	3984 Los Angeles	7.8	78.8	13.4	12.3	75	4.2	0.2	5.7	2.6
6037408724	21.97	42.94	40-45%	5362 Los Angeles	16.2	79.6	4.2	54.6	3.8	1.9	0	38.2	1.4
6095252316	21.96	42.93	40-45%	3427 Solano	13.5	77	9.5	25.9	28.4	18.2	0.3	20	7.3
6001437800	21.94	42.92	40-45%	4621 Alameda	12.6	77.4	10	37.6	16.9	7.9	0.2	33.3	4.1
6065043211	21.94	42.91	40-45%	5486 Riverside	12.7	79.3	8	29.4	57.8	3.3	0.2	5.9	3.3
6085512027	21.94	42.89	40-45%	4085 Santa Clara	12.4	74.2	13.4	29.7	42.6	5.3	0.3	17.7	4.4
6037401602	21.92	42.88	40-45%	5282 Los Angeles	12.6	79	8.4	36.9	50.1	4.1	0.6	5	3.2
6037651002	21.92	42.87	40-45%	4606 Los Angeles	9.6	73.4	17	17.2	40.2	2.3	0.3	36.3	3.6
6065043276	21.91	42.86	40-45%	3620 Riverside	16.3	75	8.7	26.3	52.1	4.6	0.2	12.7	4.1
6037273502	21.90	42.84	40-45%	2884 Los Angeles	5.4	89.1	5.5	9.5	78	3.2	0.5	4.4	4.4
6071010423	21.90	42.83	40-45%	3786 San Bernardino	8.5	69.6	21.9	17.1	76.9	1	1.2	1.2	2.5
6073002302	21.89	42.82	40-45%	6589 San Diego	18.7	75.7	5.6	57.4	6.4	10.1	0.2	24.1	1.7
6067009321	21.88	42.80	40-45%	5573 Sacramento	15.4	76.4	8.2	20.7	24.9	15.4	0.2	33	5.8
6065049400	21.85	42.79	40-45%	2978 Riverside	9.5	52.4	38.1	42.2	54.9	0.8	0.2	1.1	0.6
6081613501	21.85	42.78	40-45%	4141 San Mateo	14	75.1	10.9	40.6	52.5	0.3	0.1	4.3	2.2
6037115201	21.85	42.77	40-45%	6437 Los Angeles	8.8	80.6	10.6	24.7	40.1	6.3	0.4	24.4	4.1
6065043254	21.84	42.75	40-45%	5011 Riverside	13.2	79.3	7.5	30.1	56.1	2.9	1	7	2.9
6073018905	21.83	42.74	40-45%	6765 San Diego	17.2	74.4	8.4	61.6	32.4	1.9	0.3	1.7	2.1
6111003612	21.83	42.73	40-45%	4355 Ventura	7.6	78.2	14.2	13.3	77.5	1.7	0.3	3.9	3.3
6085506401	21.83	42.72	40-45%	4380 Santa Clara	12.4	76.9	10.7	27	44.5	4.6	0.2	20	3.6
6001405200	21.82	42.70	40-45%	4597 Alameda	7.5	80.8	11.7	9.4	38	15.2	0.2	31.2	6
6073003101	21.81	42.69	40-45%	3785 San Diego	13.2	72.5	14.3	44.3	5.6	43.1	0.3	4.6	2.1
6019005802	21.81	42.68	40-45%	4195 Fresno	9.8	74.4	15.8	20.7	62.9	2.1	0.7	11.4	2.2
6037403500	21.81	42.67	40-45%	1628 Los Angeles	8.5	66.1	25.4	32	41.2	2.5	0.1	22.1	2.1
6037186203	21.80	42.65	40-45%	2936 Los Angeles	12.2	75.3	12.5	49.5	30.8	2	0	14	3.7
6009000120	21.79	42.64	40-45%	4434 Calaveras	10.6	71.1	18.3	12	82.5	0.8	0.6	1.3	2.8

6037272201	21.79	42.63	40-45%	2411 Los Angeles	9.7	82	8.3	38	44	4.4	0.4	10.2	3
6037651221	21.78	42.62	40-45%	3291 Los Angeles	10.5	74	15.5	11.3	39	4	0.2	41.8	3.7
6067008138	21.78	42.60	40-45%	3568 Sacramento	11.5	70.3	18.2	21.2	66.8	3.1	0.7	4.2	4
6023011100	21.77	42.59	40-45%	4976 Humboldt	13.8	74.5	11.7	12.2	78.5	0.9	3.3	0.9	4.2
6037620002	21.77	42.58	40-45%	3609 Los Angeles	10.7	79.1	10.2	15.6	66.1	1.9	0.3	11.4	4.6
6059075701	21.77	42.57	40-45%	6879 Orange	13.6	74.3	12.1	44.1	43.7	2.1	0.1	7.9	2.1
6007000502	21.77	42.55	40-45%	4204 Butte	7.9	88.9	3.2	17.7	64	3.6	0.6	10	4.2
6097150611	21.75	42.54	40-45%	4067 Sonoma	15.7	75.3	9	31.3	56	1.8	0.5	7.1	3.3
6059099203	21.74	42.53	40-45%	6029 Orange	12.2	74.8	13	20.6	17.7	0.5	0	60	1.2
6067007015	21.74	42.51	40-45%	4997 Sacramento	14.9	74.8	10.3	17.5	40.2	14.4	0.6	22.7	4.6
6081600700	21.74	42.50	40-45%	7568 San Mateo	10.1	77.5	12.4	36	7.2	2.9	0.1	51.3	2.5
6083002210	21.74	42.49	40-45%	6035 Santa Barbara	17.4	75.2	7.4	63.2	27.2	0.9	0.5	6.5	1.8
6021010501	21.74	42.48	40-45%	3456 Glenn	16	74	10	68.7	27.7	0.3	0.6	1.9	0.8
6073003112	21.74	42.46	40-45%	4574 San Diego	13.6	77.6	8.8	41.7	7.4	23.9	0.1	23.6	3.4
6059075505	21.69	42.45	40-45%	3599 Orange	12.5	74.7	12.8	41.1	41.9	1.5	0.7	12.1	2.7
6037463602	21.69	42.44	40-45%	5051 Los Angeles	5.4	82.4	12.2	16.1	47.9	7.3	0.2	25.1	3.4
6037273800	21.68	42.43	40-45%	3107 Los Angeles	8.7	82.7	8.6	19.4	67	2.8	0.5	6.8	3.6
6033000400	21.68	42.41	40-45%	5574 Lake	12.1	69.3	18.6	17.7	74.1	0.8	2.9	2.1	2.4
6059063803	21.68	42.40	40-45%	4437 Orange	10.1	78.2	11.7	31.3	61.3	1	0.1	3.9	2.4
6001437900	21.67	42.39	40-45%	2338 Alameda	15.6	77.5	6.9	60.2	11.7	6.8	0.5	17.4	3.5
6059052517	21.66	42.38	40-45%	10096 Orange	15.5	79.4	5.1	8	41.5	1.5	0.1	44.2	4.8
6067008117	21.65	42.36	40-45%	2084 Sacramento	10.8	71.5	17.7	12.8	74.1	4.2	1.1	2.6	5.1
6095251300	21.64	42.35	40-45%	2938 Solano	10.5	73	16.5	18.9	58.4	9.8	0.4	6.6	5.8
6037135111	21.64	42.34	40-45%	2967 Los Angeles	10.8	76.8	12.4	23.3	58.3	4.1	0.3	10	3.9
6059021913	21.64	42.33	40-45%	8140 Orange	14.5	76.2	9.3	63.6	24	0.7	0.3	9.9	1.6
6037141102	21.64	42.31	40-45%	2869 Los Angeles	10.3	78.5	11.2	11.3	74.4	4.9	0.1	5.9	3.3
6081607600	21.63	42.30	40-45%	3342 San Mateo	14.2	72	13.8	25.8	51.1	1	0.1	18.1	3.9
6073020306	21.63	42.29	40-45%	8694 San Diego	11.1	77.3	11.6	19.8	60.1	3.7	0.2	11.8	4.3
6001444400	21.63	42.28	40-45%	5114 Alameda	14.3	77.7	8	53	20.3	3.8	0.2	20	2.7
6085500400	21.62	42.26	40-45%	2369 Santa Clara	12.8	77.2	10	37.4	46.4	4.3	0.2	8.7	3.1
6013317000	21.61	42.25	40-45%	2144 Contra Costa	8.3	82	9.7	15.2	74.5	2.3	0.4	3.5	4.1
6037503901	21.60	42.24	40-45%	2702 Los Angeles	11.7	74.1	14.2	42.6	38.2	1.9	0.5	14.3	2.4
6071009118	21.60	42.22	40-45%	22862 San Bernardino	19.4	74.8	5.8	50	27.2	14	0.4	5.1	3.3
6111007000	21.59	42.21	40-45%	3907 Ventura	11.3	74.9	13.8	41.3	44	1.5	0.1	11.2	1.9
6073006802	21.58	42.20	40-45%	5032 San Diego	9.9	80.4	9.7	24	60	5.6	0.2	5.2	4.9
6065044701	21.58	42.19	40-45%	3555 Riverside	8.9	67.7	23.4	31.6	55.1	4.8	0.7	5.1	2.6
6083002011	21.56	42.17	40-45%	5317 Santa Barbara	13.8	72.2	14	53.6	38.1	1.6	0.6	4.5	1.7
6085504414	21.55	42.16	40-45%	5092 Santa Clara	11.9	76.8	11.3	6.8	10.6	1.3	0	78.9	2.4
6065042740	21.55	42.15	40-45%	2017 Riverside	0.7	28.3	71	7.8	83.9	3.8	0.4	2.6	1.4
6065042411	21.55	42.14	40-45%	2540 Riverside	11.1	79.9	9	36.7	35	19.3	0.4	5.2	3.5
6067007427	21.51	42.12	40-45%	6840 Sacramento	16.4	77.8	5.8	16.1	56.1	8.3	0.6	13.1	5.8
6059099605	21.51	42.11	40-45%	3690 Orange	10.7	73.7	15.6	15.8	61.6	0.7	0.2	18	3.7
6029006008	21.51	42.10	40-45%	5956 Kern	7.6	69.6	22.8	7.8	86.8	1.3	0.7	1.2	2.1
6085505600	21.50	42.09	40-45%	3880 Santa Clara	6.3	84.1	9.6	19.5	53.2	3.9	0.4	17.8	5.3
6037702502	21.50	42.07	40-45%	4048 Los Angeles	8.7	70.7	20.6	12.3	46	20.2	0	16.1	5.3
6081606300	21.50	42.06	40-45%	4073 San Mateo	9.1	69.7	21.2	27.8	46.3	2.3	0.1	20.1	3.3
6059099241	21.50	42.05	40-45%	4274 Orange	10.4	77.5	12.1	19.3	44.4	1.7	0.2	31.3	3.2
6065044505	21.49	42.04	40-45%	6479 Riverside	12.6	65.5	21.9	56.4	39.3	1.1	0.5	1.5	1.2
6059063906	21.49	42.02	40-45%	6591 Orange	10.9	84.1	5	44	44.2	1.4	0.4	7.4	2.7
6061021304	21.48	42.01	40-45%	5307 Placer	10.6	74.2	15.2	12.2	81.8	0.3	1.5	1.1	3.1
6037701502	21.47	42.00	40-45%	3841 Los Angeles	5.3	73.5	21.2	10	72.6	3.5	0.2	10.1	3.6
6045010900	21.46	41.99	40-45%	4332 Mendocino	12.7	74	13.3	31.1	62.7	0.6	2	1.5	2.1
6037800328	21.45	41.97	40-45%	2640 Los Angeles	10.6	81.1	8.3	8.9	75.6	2.4	0.2	9.4	3.6
6095252305	21.45	41.96	40-45%	4711 Solano	12.7	74.8	12.5	17.9	48.2	10.5	0.6	17.4	5.5
6037271701	21.44	41.95	40-45%	5850 Los Angeles	9	80.7	10.3	13.7	51.7	4.7	0.2	25.2	4.5
6071011206	21.44	41.93	40-45%	995 San Bernardino	9.2	72.4	18.4	15.6	79.4	0.7	1	1	2.3
6001441503	21.44	41.92	40-45%	5389 Alameda	21.8	73.7	4.5	4.2	9.9	1.7	0.2	80.6	3.4
6011000400	21.43	41.91	40-45%	2495 Colusa	11.6	71.1	17.3	35.5	58.3	1.9	2.1	0.9	1.2
6037920112	21.42	41.90	40-45%	4287 Los Angeles	11.1	73.8	15.1	18.4	68.9	2.3	0.2	7.8	2.4
6073016902	21.41	41.88	40-45%	2341 San Diego	12.7	74.6	12.7	15.5	58.7	0.9	21.1	1.5	2.2
6037670002	21.41	41.87	40-45%	4001 Los Angeles	13.3	74.9	11.8	37.7	38.7	4	0.3	14.8	4.3
6037503402	21.40	41.86	40-45%	4273 Los Angeles	12.6	74.3	13.1	54	39.4	0.4	0.2	5	1.1
6075031400	21.40	41.85	40-45%	6676 San Francisco	9.2	78.7	12.1	25.7	9.6	15.1	0.2	46.8	2.6
6067009403	21.39	41.83	40-45%	2038 Sacramento	10.6	74.5	14.9	21.3	70.8	1	0.2	4.6	2.1
6085503902	21.38	41.82	40-45%	5440 Santa Clara	19	72.7	8.3	63.9	14.6	1.1	0.3	18.5	1.5
6075033201	21.38	41.81	40-45%	3683 San Francisco	1.6	92.4	6	17.9	45.9	7.2	0.2	22.4	6.4
6065042745	21.37	41.80	40-45%	4614 Riverside	10.6	61.8	27.6	27.2	61	4.3	0.5	4.7	2.3
6099000504	21.37	41.78	40-45%	8692 Stanislaus	13	74.3	12.7	22.7	54.4	3	0.3	15.1	4.5
6073008505	21.36	41.77	40-45%	5605 San Diego	9.3	75.9	14.8	23.2	56.9	1.9	0.4	14.3	3.3
6071007306	21.35	41.76	40-45%	5859 San Bernardino	14.4	73.8	11.8	24.1	32.9	9.8	0.3	29.1	3.8
6059021815	21.35	41.75	40-45%	7751 Orange	14.1	75.4	10.5	13.4	48.7	1.4	0.3	33.6	2.7
6037401304	21.34	41.73	40-45%	5642 Los Angeles	8.1	73.4	18.5	26.5	53.8	2.4	0	14.6	2.8
6001436401	21.34	41.72	40-45%	7042 Alameda	11.6	77.1	11.3	28.6	37.1	14.7	0.6	14	4.9
6037461400	21.33	41.71	40-45%	3204 Los Angeles	11.2	71.4	17.4	21.3	56.2	8.9	0.1	9.9	3.7
6111008101	21.32	41.70	40-45%	3433 Ventura	12.3	75.9	11.8	23.7	64.9	0.9	0.2	8.1	2.1
6037461700	21.32	41.68	40-45%	1385 Los Angeles	7	70.8	22.2	15.5	55.6	19.2	0.1	6.9	2.6
6065042013	21.30	41.67	40-45%	8333 Riverside	13.5	80.7	5.8	29.7	47.9	7.8	0.2	10.7	3.8
6037574902	21.28	41.66	40-45%	4783 Los Angeles	7.7	86.4	5.9	20.6	44.8	10	0.4	19.2	5
6067007433	21.28	41.64	40-45%	7656 Sacramento	16.4	76.2	7.4	13.4	57	8.5	0.5	15.3	5.3
6087110700	21.27	41.63	40-45%	3357 Santa Cruz	16.5	74.3	9.2	71.3	23.2	0.8	0.4	2.9	1.4
6073012800	21.27	41.62	40-45%	3913 San Diego	13.9	71.1	15	61.7	29.6	2.2	0.2	4.6	1.7
6001440306	21.27	41.61	40-45%	3841 Alameda	13.8	77.5	8.7	11	8.4	9	0.1	66.2	5.3
6013387000	21.26	41.59	40-45%	2532 Contra Costa	10.1	72.1	17.8	11.2	43.7	9	0.2	31.8	4.1
6037300502	21.25	41.58	40-45%	6026 Los Angeles	10.2	79.3	10.5	14.3	54.9	0.8	0.2	27	2.8
6101050601	21.25	41.57	40-45%	6029 Sutter	13.8	71.5	14.7	16.1	60.7	1.4	1	17.7	3
6059042307	21.25	41.56	40-45%	6900 Orange	11.6	75.7	12.7	22.4	59.7	1.2	0.1	13.6	3
6053000702	21.25	41.54	40-45%	6371 Monterey	23.5	73.3	3.2	97.7	1.6	0.2	0.1	0.2	0.2
6077004704	21.25	41.53	40-45%	4894 San Joaquin	12.2	71.4	16.4	31.4	63.3	0.6	0.4	2.5	1.8
6073020602	21.24	41.52	40-45%	5859 San Diego	14.8	77	8.2	47.6	44.2	2.6	0.7	3	1.9
6001451101	21.24	41.51	40-45%	7081 Alameda	15.7	76.5	7.8	15.5	63.6	2.7	0.3	13.8	4.1
6007002700	21.24	41.49	40-45%	5478 Butte	13	68.9	18.1	9.1	79.6	1.1	3	3.1	4.1
6007002400	21.23	41.48	40-45%	5157 Butte	7	71.3	21.7	7.2	83.9	0.6	2.9	1.2	4.2
6013318000	21.23	41.47	40-45%	3267 Contra Costa	9.8	78	12.2	15.3	72.6	2.9	0.8	3	5.5
6001435300	21.23	41.46	40-45%	4479 Alameda	13.9	74.2	11.9	32.1	27.3	22.7	0.6	12.9	4.4
6037295103	21.22	41.44	40-45%	4875 Los Angeles	10.4	69.4	20.2	21.7	61.3	3	0.2	10.4	3.4
6111004711	21.22	41.43	40-45%	3432 Ventura	13.1	73.1	13.8	53	6.6	1.6	0.1	36.4	2.2
6037900608	21.21	41.42	40-45%	3536 Los Angeles	17.5	74.3	8.2	44.1	24	25.1	0.2	3.3	3.4
6071000819	21.20	41.40	40-45%	5077 San Bernardino	13.7	70.8	15.5	22.5	51.6	3.8	0.3	19.4	2.5
6001432200	21.20	41.39	40-45%	4080 Alameda	12	68.7	19.3	24.7	40.3	20.4	0.2	10.4	4
6037134423	21.20	41.38	40-45%	3414 Los Angeles	9.8	71.5	18.7	12.3	67.4	2.5	0.1	14.4	3.3
6037920040	21.20	41.37	40-45%	3352 Los Angeles	15.4	77.6	7	26.1	50.5	6.1	0.4	13.3	3.6
6085501800	21.19	41.35	40-45%	5085 Santa Clara	14.3	77.5	8.2	54.2	37	1.3	0.3	4.9	2.3
6037576602	21.19	41.34	40-45%	3995 Los Angeles	4.1	84.3	11.6	22.3	57.9	8.2	0.3	7.2	4.1
6065043807	21.19	41.33	40-45%	5743 Riverside	16.7	73.6	9.7	38.1	50.3	4.3	1.2	3.9	2.2
6029000908	21.19	41.32	40-45%	5493 Kern	15.8	74.7	9.5	43.9	45.1	4.1	1	3.2	2.6
6045010300	21.19	41.30	40-45%	4272 Mendocino	8.7	71.4	19.9	12.4	81.5	1.4	1.5	1	2.3
6065042729	21.19	41.29	40-45%	9184 Riverside	10.2	58.9	30.9	24.6	61.1	6	0.4	5.4	2.5
6037188201	21.18	41.28	40-45%	3270 Los Angeles	7	83.9	9.1	17.5	60.4	4.2	0.2	14.1	3.7
6013313205	21.18	41.27	40-45%	1724 Contra Costa	15.7	80	4.3	46.8	22.9	6.4	0.2	20	3.7
6013302009	21.17	41.25	40-45%	5641 Contra Costa	17	77.9	5.1	25.8	25.7	24.3	0.4	17.4	6.4
6097150603	21.17	41.24	40-45%	7249 Sonoma	11.1	71.4	17.5	32.9	59.6	1.2	0.4	3.5	2.5
6037113101	21.17	41.23	40-45%	3558 Los Angeles	8.9	70.1	21	20.5	60.4	3.1	0.4	12.3	3.2
6087110502	21.16	41.22	40-45%	6088 Santa Cruz	17.3	76.4	6.3	85.2	11.7	0.2	0.1	2	0.9
6073008359	21.16	41.20	40-45%	3975 San Diego	11.9	82.3	5.8	19.6	31.2	5.9	0.4	38.1	4.8
6073020028	21.16	41.19	40-45%	3479 San Diego	23.4	75.7	0.9	82.4	9	2.4	0.2	5.2	0.8
6037117301	21.16	41.18	40-45%	3851 Los Angeles	11.4	74	14.6	32.5	45.2	5	0.2	14.4	2.7
6055201005	21.14	41.17	40-45%	2418 Napa	14.7	76.3	9	25.6	38.4	5.9	0.5	24.8	4.8
6037702501	21.13	41.15	40-45%	4625 Los Angeles	10.9	76.5	12.6	16.4	63.4	3.1	0.1	12.5	4.5
6073013503	21.13	41.14	40-45%	5776 San Diego	13.7	75.4	10.9	30.7	47.1	11.9	0.5	5	4.8
6037503301	21.13	41.13	40-45%	3394 Los Angeles	13.5	76.1	10.4	62.6	33.4	0.4	0.2	2.2	1.3
6065042739	21.13	41.11	40-45%	7097 Riverside	16.2	76.5	7.3	30.6	48.7	6.8	0.4	8.9	4.5
6083001704	21.13	41.10	40-45%	2565 Santa Barbara	12.7	74.8	12.5	56.7	39.7	0.5	0.2	2	0.9
6085502910	21.12	41.09	40-45%	3656 Santa Clara	13.6	73.3	13.1	26.8	52.5	2.5	0.3	13.6	4.3

6059001503	21.11	41.08	40-45%	5099 Orange	12.7	75.4	11.9	33.1	55.6	1.1	0.3	7.3	2.6
6075022803	21.11	41.06	40-45%	4595 San Francisco	9.8	82.1	8.1	52.8	33.3	1.2	0.2	9.9	2.6
6083002303	21.11	41.05	40-45%	6765 Santa Barbara	18.9	74.2	6.9	88.4	5.6	0.4	0.1	4.8	0.7
6095250502	21.09	41.04	40-45%	3128 Solano	10.9	74.1	15	13.9	35.6	21.2	0.3	23.2	5.8
6083001604	21.09	41.03	40-45%	5190 Santa Barbara	10.9	75.4	13.7	47.5	48.3	0.6	0.3	1.8	1.5
6037800204	21.08	41.01	40-45%	6740 Los Angeles	9	68.8	22.2	5.5	81.8	1.2	0.1	7.7	3.8
6067008141	21.08	41.00	40-45%	6799 Sacramento	16.1	76.5	7.4	27.1	60.5	5	0.6	3.3	3.5
6037574202	21.07	40.99	40-45%	2161 Los Angeles	12.4	70.1	17.5	28.6	55.9	5.5	0.3	6.6	3.2
6059088202	21.06	40.98	40-45%	3005 Orange	11.8	75	13.2	28.8	33.8	1.4	0.1	33.4	2.5
6075033204	21.06	40.96	40-45%	3821 San Francisco	4.3	84.8	10.9	15.9	38.8	6.2	0.5	33.5	5.1
6013339002	21.06	40.95	40-45%	5574 Contra Costa	7.3	80.3	12.4	12.6	67.3	2.6	0.1	13.4	3.9
6085512308	21.06	40.94	40-45%	7006 Santa Clara	14.7	75.4	9.9	23.6	56.1	1.4	0.2	14.5	4.1
6073019207	21.05	40.93	40-45%	8416 San Diego	14.9	72.1	13	43.3	47.8	2.4	0.3	4.2	2
6059052418	21.05	40.91	40-45%	12096 Orange	16.9	78.6	4.5	11.4	35.6	2.6	0.1	45	5.4
6073016503	21.05	40.90	40-45%	2784 San Diego	13.7	74.5	11.8	21.5	64.4	5.5	0.5	3.4	4.7
6037503702	21.05	40.89	40-45%	5040 Los Angeles	12.2	74.6	13.2	48.9	43.3	1.6	0.2	4.4	1.5
6037432000	21.04	40.88	40-45%	8182 Los Angeles	9.1	71.4	19.5	16.1	25.7	0.9	0.1	55.6	1.6
6029002807	21.04	40.86	40-45%	3894 Kern	9.8	71.6	18.6	18.3	69.7	4.2	0.4	5	2.4
6007000700	21.01	40.85	40-45%	4694 Butte	9.5	79.4	11.1	10.4	80.4	1.5	0.6	3.2	3.9
6037900506	21.01	40.84	40-45%	4352 Los Angeles	18	75.7	6.3	39.5	22.4	31.3	0.3	2.8	3.7
6073002905	21.00	40.82	40-45%	4022 San Diego	10.4	82.1	7.5	23.1	52	10.5	0.3	9.7	4.4
6037430724	21.00	40.81	40-45%	4812 Los Angeles	10.6	74.5	14.9	10.7	21.3	1.8	0.1	64.1	2
6037403406	21.00	40.80	40-45%	2796 Los Angeles	10	79	11	21.1	20.3	1.8	0	53.7	3.1
6065043315	20.99	40.79	40-45%	2073 Riverside	11	75.8	13.2	26.6	67.3	1.4	1.1	1.6	1.9
6037400403	20.99	40.77	40-45%	3815 Los Angeles	9.2	77.8	13	32.2	54	3.3	0.2	7.7	2.6
6059075506	20.99	40.76	40-45%	3437 Orange	11.6	71	17.4	27	54.1	1.6	0.5	13.5	3.3
6037275311	20.98	40.75	40-45%	4993 Los Angeles	9.4	73.7	16.9	28	43.5	3.2	0.1	21.2	3.9
6047001801	20.98	40.74	40-45%	4288 Merced	10.8	81.4	7.8	29.6	48.2	3.2	0.6	15.5	2.9
6073003202	20.97	40.72	40-45%	4551 San Diego	13.8	72.6	13.6	66.9	14.7	5.5	0.1	10.7	2.1
6065042724	20.97	40.71	40-45%	3182 Riverside	20.2	74.7	5.1	35.6	43.3	7.4	0.3	9.4	4.1
6097151900	20.97	40.70	40-45%	3158 Sonoma	10.3	73.4	16.3	25	65.4	2.5	0.9	2.5	3.7
6001408400	20.97	40.69	40-45%	3323 Alameda	16.7	75.7	7.6	37.9	3	51.2	0.5	5.2	2.3
6073008510	20.97	40.67	40-45%	6626 San Diego	9.8	75.2	15	22.5	48.7	5.4	0.4	18.6	4.5
6019004303	20.96	40.66	40-45%	4162 Fresno	7.6	60.9	31.5	14.3	76.1	2.3	0.4	4.7	2.2
6045010500	20.95	40.65	40-45%	4439 Mendocino	14.8	70.1	15.1	34.2	59.1	0.5	1.6	1.8	2.7
6059099508	20.95	40.64	40-45%	4500 Orange	9.6	71.4	19	21.8	68.2	0.6	0.5	5.8	3
6093000701	20.95	40.62	40-45%	3755 Siskiyou	8.4	68.8	22.8	5.7	87.1	0.4	2.2	0.8	3.8
6085503804	20.94	40.61	40-45%	4980 Santa Clara	13.2	72.6	14.2	27.4	15.2	3.6	0.2	51.2	2.4
6071002015	20.94	40.60	40-45%	4777 San Bernardino	13.1	77.1	9.8	33.5	53.5	4.2	0.3	6.1	2.3
6001428500	20.93	40.59	40-45%	3183 Alameda	10.1	73.8	16.1	9.3	45.6	6.7	0.3	31.2	6.8
6095250604	20.93	40.57	40-45%	3842 Solano	10.5	78.7	10.8	12	27.8	18.2	0.3	35.9	5.9
6085509202	20.92	40.56	40-45%	4480 Santa Clara	11.2	75.8	13	21.9	46.4	1.5	0.2	26.5	3.5
6037920042	20.92	40.55	40-45%	6769 Los Angeles	13.8	76.6	9.6	28.7	47.7	6.3	0.4	12.8	4.1
6037273100	20.91	40.53	40-45%	2197 Los Angeles	9.6	75.5	14.9	22.2	66.5	2.1	0.1	6.1	3
6029003805	20.91	40.52	40-45%	8774 Kern	17.7	76.1	6.2	23.6	63.3	1.9	0.6	7.9	2.7
6061020300	20.90	40.51	40-45%	4520 Placer	9.6	70.1	20.3	12.3	81.9	0.6	0.6	1.1	3.4
6037267800	20.89	40.50	40-45%	2917 Los Angeles	14.2	69.8	16	8.7	66.7	1.8	0.2	16.7	6
6065044605	20.89	40.48	40-45%	4803 Riverside	15	72.1	12.9	43.2	36.2	14.6	0.4	3.4	2.2
6037296402	20.89	40.47	40-45%	3091 Los Angeles	11.4	73.7	14.9	52	38.2	2.9	0.4	3.4	3.1
6097151305	20.88	40.46	40-45%	5405 Sonoma	13.4	76.6	10	36	53.4	2.2	0.4	4.5	3.5
6085508601	20.88	40.45	40-45%	3668 Santa Clara	13.9	73	13.1	19.6	43.9	0.8	0.2	31.2	4.3
6097152903	20.88	40.43	40-45%	5114 Sonoma	17.2	75.6	7.2	52.7	31.2	4.2	1	8.3	2.6
6001409700	20.87	40.42	40-45%	4696 Alameda	19.1	74.1	6.8	39	2.7	49.1	0.3	6.6	2.3
6081610800	20.86	40.41	40-45%	4721 San Mateo	17.4	77	5.6	67.3	21.5	2.3	0.1	6	2.8
6037431002	20.84	40.40	40-45%	3163 Los Angeles	10.8	69.8	19.4	26.3	53.4	5.3	0.2	11.8	3.1
6071007404	20.84	40.38	40-45%	4406 San Bernardino	10.4	69.8	19.8	28.6	54.2	9	0.5	4.3	3.3
6065043220	20.83	40.37	40-45%	4594 Riverside	16	79	5	38.3	43.8	3.7	0.5	9.5	4.2
6037920332	20.83	40.36	40-45%	2337 Los Angeles	6.8	85.3	7.9	16.8	73	2.4	0.6	5.3	1.8
6037265700	20.83	40.35	40-45%	4720 Los Angeles	8.4	63.8	27.8	4.4	81.8	1.9	0	7.6	4.2
6075025900	20.82	40.33	40-45%	4261 San Francisco	9.3	73.9	16.8	18.7	18.5	10.1	0.1	49.1	3.4
6085508004	20.82	40.32	40-45%	6090 Santa Clara	13.8	79.4	6.8	7.4	28.9	1.2	0.2	58.6	3.8
6037113212	20.81	40.31	40-45%	3069 Los Angeles	9.7	75	15.3	23.2	51.1	4.9	0.2	17.7	2.8
6073000800	20.81	40.30	40-45%	4280 San Diego	7.5	81.7	10.8	21.1	61.8	7.3	0.4	5.5	3.9
6013308002	20.81	40.28	40-45%	4194 Contra Costa	13	80.4	6.6	25.7	37.9	15.9	0.4	13.9	6.3
6037570800	20.79	40.27	40-45%	5540 Los Angeles	12.9	76.7	10.4	28.3	50.1	5	0.2	12.1	4.4
6085512309	20.78	40.26	40-45%	4996 Santa Clara	13.2	76	10.8	25.1	59.6	1.5	0.4	9.5	3.8
6067009504	20.78	40.24	40-45%	2059 Sacramento	17	71.6	11.4	50	44.4	0.7	0.5	2.2	2.1
6075025500	20.77	40.23	40-45%	8471 San Francisco	9.7	76.5	13.8	31.8	20.9	1.3	0.1	43.8	2.1
6037111206	20.75	40.22	40-45%	4490 Los Angeles	9.6	71.2	19.2	20.7	56.9	3	0.2	16.3	2.9
6097150612	20.75	40.21	40-45%	4325 Sonoma	11	78.5	10.5	15.4	75.1	0.6	0.6	5.2	3.2
6037701000	20.75	40.19	40-45%	5431 Los Angeles	7.8	73.5	18.7	6	79.1	2.3	0.2	8.5	4
6037910202	20.74	40.18	40-45%	5223 Los Angeles	10.6	76.6	12.8	24.9	58.1	6.8	0.6	6.7	2.9
6101050503	20.74	40.17	40-45%	6966 Sutter	15.1	70.9	14	20.2	42.1	1.5	0.8	31.6	3.8
6013319000	20.73	40.16	40-45%	7412 Contra Costa	10.6	79.2	10.2	18.3	68.9	2.6	0.6	5.4	4.2
6081601501	20.73	40.14	40-45%	5063 San Mateo	8.7	74.2	17.1	10.3	11.9	1.8	0.1	73	3
6073010004	20.72	40.13	40-45%	4679 San Diego	11.7	74.4	13.9	76.6	8	2.6	0.1	11	1.6
6037650603	20.71	40.12	40-45%	3958 Los Angeles	8.9	70.4	20.7	9.3	48.7	1.3	0.3	36.1	4.3
6085504412	20.70	40.11	40-45%	4901 Santa Clara	13.9	78.4	7.7	26.5	11.2	1.8	0.3	56.8	3.3
6065047000	20.70	40.09	40-45%	1749 Riverside	16.1	69.7	14.2	34.7	58.3	4	1.1	0.4	1.5
6057000701	20.69	40.08	40-45%	7436 Nevada	7.6	71.4	21	5.2	90.5	0.3	0.7	1	2.3
6059063807	20.68	40.07	40-45%	4957 Orange	8.6	82.3	9.1	21.8	58.2	2.9	0.3	14.3	2.4
6111004504	20.67	40.06	40-45%	5389 Ventura	16.9	74.7	8.4	71.1	6.7	2.3	0.1	17.5	2.2
6113011101	20.67	40.04	40-45%	3070 Yolo	15.4	72.1	12.5	49.3	44.4	1.2	0.7	2.1	2.3
6073013301	20.67	40.03	40-45%	5180 San Diego	11.4	75.6	13	62.7	27.9	2.3	0.2	4.1	2.8
6095252703	20.67	40.02	40-45%	3846 Solano	15.2	79.3	5.5	27	22.6	21	0.5	21.5	7.4
6037274100	20.66	40.01	40-45%	4418 Los Angeles	8	79.7	12.3	9.7	67.1	4.9	0.1	13.9	4.3
6073001500	20.66	39.99	35-40%	3934 San Diego	10.5	81.9	7.6	31.2	53.1	6.6	0.6	5.1	3.3
6001442400	20.65	39.98	35-40%	6253 Alameda	13	77.5	9.5	28.8	31.1	3.1	0.2	33.3	3.6
6059052416	20.65	39.97	35-40%	4006 Orange	12.2	78.7	9.1	32	51.9	1.5	0.6	11.7	2.3
6073016402	20.65	39.95	35-40%	7452 San Diego	12.2	75.9	11.9	25.8	60.7	5.1	0.7	3.6	4.1
6095253105	20.64	39.94	35-40%	5958 Solano	14.1	78.5	7.4	30.3	46.8	10.7	0.6	6.1	5.5
6073003107	20.63	39.93	35-40%	5992 San Diego	13.4	74.8	11.8	38.8	13.3	18.7	0.6	24.1	4.7
6085504505	20.63	39.92	35-40%	4418 Santa Clara	13.4	77.3	9.3	16.9	13.4	2.8	0.2	61.7	5
6037403303	20.63	39.90	35-40%	2523 Los Angeles	8.8	76.9	14.3	33.5	19.1	2.4	0.1	42.2	2.7
6037403319	20.62	39.89	35-40%	4260 Los Angeles	9.9	79.7	10.4	22.3	21.5	6	0.1	47.8	2.4
6037700501	20.62	39.88	35-40%	3687 Los Angeles	3	82.6	14.4	9	78.5	2.8	0.1	6.3	3.4
6059063202	20.62	39.87	35-40%	3556 Orange	11.4	76.1	12.5	19.4	74.6	0.3	0.1	3.1	2.4
6059032028	20.62	39.85	35-40%	3102 Orange	11.3	82.2	6.5	29	55.1	1.6	0.2	10.5	3.6
6067008010	20.62	39.84	35-40%	4890 Sacramento	9.5	73.9	16.6	8.7	78.7	2.4	0.6	5.1	4.5
6089012400	20.61	39.83	35-40%	4100 Shasta	8.6	73.6	17.8	5.4	86.2	0.5	2.5	1.2	4.2
6059110303	20.61	39.82	35-40%	4986 Orange	12.3	75.9	11.8	31.2	35.5	3.4	0.3	26.4	3.1
6085504323	20.60	39.80	35-40%	5741 Santa Clara	12.2	78.9	8.9	13.7	11.2	2.1	0.1	70.1	2.8
6037650102	20.60	39.79	35-40%	2248 Los Angeles	9.2	79.6	11.2	20.3	41.8	2.6	0	29.8	5.4
6059063805	20.60	39.78	35-40%	2415 Orange	12.8	71.5	15.7	16	72.8	1	0.2	7.6	2.5
6065050400	20.59	39.77	35-40%	10378 Riverside	17.3	77.1	5.6	31.2	50.1	4.7	0.3	9.4	4.3
6059110108	20.58	39.75	35-40%	2733 Orange	8.7	74	17.3	23.5	55.4	2.5	0.1	14.5	4.1
6085506304	20.57	39.74	35-40%	4958 Santa Clara	13.7	80.2	6.1	30.3	31.4	4.2	0.2	30.2	3.7
6067009614	20.57	39.73	35-40%	6658 Sacramento	14.8	78.8	6.4	20.9	29.2	14.4	0.2	28.6	6.7
6059099232	20.55	39.71	35-40%	5325 Orange	9	69.1	21.9	9.8	65.5	0.4	0.1	21.4	2.9
6085506203	20.55	39.70	35-40%	6163 Santa Clara	15.7	77.9	6.4	12.9	21.9	3	0.3	58	3.9
6037403322	20.54	39.69	35-40%	3808 Los Angeles	8	79.3	12.7	20.5	25.8	2.5	0.1	48.6	2.4
6037103400	20.53	39.68	35-40%	6143 Los Angeles	9.5	77	13.5	25.1	61.6	1.4	0.4	8.1	3.4
6083002305	20.53	39.66	35-40%	7556 Santa Barbara	19	74	7	87.9	6.2	0.9	0.3	3.7	1
6081607702	20.52	39.65	35-40%	2859 San Mateo	12.2	75.7	12.1	37.1	30.6	1.9	0.2	25	5.1
6035040400	20.52	39.64	35-40%	9422 Lassen	1.7	95.8	2.5	33.4	38.4	21.9	1.7	0.6	4.1
6073019403	20.51	39.63	35-40%	5255 San Diego	13.8	79.3	6.9	49.1	38.3	2.5	0.3	7.3	2.4
6037571400	20.50	39.61	35-40%	4770 Los Angeles	12.2	75.5	12.3	27.3	43.2	10.1	0.4	15.3	3.6
6085504421	20.50	39.60	35-40%	4733 Santa Clara	12.2	76.9	10.9	12.5	15.3	3.3	0.2	65.3	3.4
6067009407	20.49	39.59	35-40%	9944 Sacramento	16.2	76.1	7.7	37.9	51.7	1.8	0.4	4.8	3.4
6037401203	20.49	39.58	35-40%	5216 Los Angeles	11.1	75.5	13.4	40.5	45.1	2.5	0.3	9	2.7
6037910208	20.49	39.56	35-40%	6340 Los Angeles	14.8	77.6	7.6	47.3	31.1	11.8	0.5	6.3	2.9
6037143300	20.49	39.55	35-40%	5871 Los Angeles	10.1	78.6	11.3	15.8	70.1	4.4	0.2	6.1	3.5
6001441524	20.48	39.54	35-40%	4010 Alameda	22.1	72.2	5.7	4	10.7	2.2	0.2	79.3	3.6

6037401102	20.48	39.53	35-40%	3101 Los Angeles	13.2	76.6	10.2	37.7	51.6	1.9	0.3	5.9	2.6
6037430801	20.48	39.51	35-40%	6342 Los Angeles	10.6	80.7	8.7	13.9	14	1.5	0.1	68.7	1.8
6071009714	20.47	39.50	35-40%	3606 San Bernardino	12.9	74.4	12.7	26.8	56.3	10.3	0.4	2.9	3.2
6007000300	20.47	39.49	35-40%	4410 Butte	13	72.9	14.1	18.5	70.2	2.3	1.4	3.9	3.7
6065042737	20.46	39.48	35-40%	2401 Riverside	19.4	74.4	6.2	31.9	50.1	6.2	0.3	8.3	3.3
6037113231	20.44	39.46	35-40%	2125 Los Angeles	9.6	72.1	18.3	11.2	70.4	3.7	0.1	10.5	4
6037463700	20.44	39.45	35-40%	2236 Los Angeles	7.3	68.1	24.6	13.6	66.4	3.8	0	12.9	3.4
6071010416	20.43	39.44	35-40%	3433 San Bernardino	9.6	73.6	16.8	14.6	74.1	3.8	0.6	2.8	4.2
6073020707	20.43	39.42	35-40%	4734 San Diego	17.3	77.8	4.9	53.6	34.5	3.4	0.4	5.2	2.9
6065042708	20.43	39.41	35-40%	5171 Riverside	16.4	77.8	5.8	36.5	51	3.4	0.3	5.6	3.1
6071002022	20.43	39.40	35-40%	11426 San Bernardino	15.4	79.4	5.2	26.8	43.4	9.5	0.2	16.9	3.2
6037462900	20.42	39.39	35-40%	3818 Los Angeles	13.1	71.9	15	28.6	49.4	3.1	0.2	14.6	4.1
6067005901	20.41	39.37	35-40%	5892 Sacramento	9.2	61.6	29.2	9.2	79.3	2.6	0.5	5.2	3.2
6065043242	20.40	39.36	35-40%	8148 Riverside	19.6	74.9	5.5	26.4	53.5	5.1	0.5	9.7	4.9
6065041905	20.39	39.35	35-40%	2935 Riverside	17.8	75.9	6.3	57	31.6	4.7	0.5	4.5	1.8
6041105000	20.39	39.34	35-40%	6590 Marin	16.9	71	12.1	23.4	58.7	4.6	0.3	8.6	4.4
6071009712	20.39	39.32	35-40%	5978 San Bernardino	16.6	71.8	11.6	37.7	49.7	7.7	0.5	1.7	2.7
6067005605	20.38	39.31	35-40%	3124 Sacramento	14.8	75.2	10	27.7	50.6	11.1	0.6	4.7	5.2
6083002206	20.38	39.30	35-40%	4782 Santa Barbara	18.9	68.3	12.8	65.7	28.1	1.7	0.3	2.6	1.6
6037700902	20.38	39.29	35-40%	6517 Los Angeles	8.5	78.5	13	6.1	74.2	3	0.2	11.6	5
6067009310	20.37	39.27	35-40%	7000 Sacramento	12.2	77.8	10	19.3	64.8	3.9	0.7	6.5	4.8
6085512025	20.37	39.26	35-40%	3203 Santa Clara	13	70.4	16.6	23.9	48	2.3	0.3	21	4.4
6037186201	20.37	39.25	35-40%	3068 Los Angeles	10.2	76.3	13.5	42.3	15.5	2.2	0.6	37.4	2
6037278102	20.37	39.24	35-40%	3158 Los Angeles	6.6	78.4	15	8.9	78.1	4.3	0.2	5	3.5
6095250605	20.36	39.22	35-40%	4223 Solano	10	79.7	10.3	12.2	26.1	18.9	0.3	36.7	5.8
6037910712	20.35	39.21	35-40%	2772 Los Angeles	15.7	78.7	5.6	61.5	17.1	16.1	0.1	3.3	1.8
6001441923	20.34	39.20	35-40%	5605 Alameda	15.7	70.8	13.5	17	18.9	4	0.4	54.5	5.2
6097150701	20.34	39.19	35-40%	4609 Sonoma	11.8	76.9	11.3	20.1	71.7	1.1	0.6	3.1	3.4
6059062625	20.33	39.17	35-40%	4381 Orange	10.1	57.7	32.2	38.1	49.8	0.7	0.1	9	2.4
6095252202	20.33	39.16	35-40%	9825 Solano	14.6	79.3	6.1	20.4	38.2	10.7	0.3	24.4	6
6083001206	20.32	39.15	35-40%	4480 Santa Barbara	12.4	82.8	4.8	56.1	36.5	0.8	0.3	4.4	2
6073008504	20.32	39.13	35-40%	6021 San Diego	10.2	73.7	16.1	23.2	64.5	1.3	0.2	7	3.7
6113010401	20.32	39.12	35-40%	4532 Yolo	10.9	74.2	14.9	19.9	62	1.6	0.2	12.4	3.8
6029000505	20.31	39.11	35-40%	3764 Kern	10.1	76.3	13.6	15.6	77.6	1.4	0.8	2.1	2.4
6065042738	20.31	39.10	35-40%	5729 Riverside	15.6	77.9	6.5	27.8	55.6	5.4	0.2	7.3	3.6
6073019805	20.31	39.08	35-40%	3763 San Diego	12.1	66.2	21.7	38.1	51.3	3.6	0.3	3.9	2.8
6037910601	20.29	39.07	35-40%	6460 Los Angeles	18.9	75.1	6	67.8	15.5	13	0.5	1.4	1.7
6073002904	20.28	39.06	35-40%	7316 San Diego	3.9	91.7	4.4	17.3	58.6	5.9	0.2	13.6	4.4
6065043818	20.28	39.05	35-40%	3832 Riverside	20	73.1	6.9	36	41.5	5.3	0.4	14.2	2.6
6073014101	20.27	39.03	35-40%	3507 San Diego	13	74.8	12.2	46.5	38.4	7.8	0.4	3.8	3.2
6037134422	20.27	39.02	35-40%	4684 Los Angeles	11.1	73.4	15.5	16	61.7	3.5	0	16	2.8
6001427900	20.27	39.01	35-40%	4567 Alameda	9.8	78.2	12	12.3	55.8	4.6	0.2	21.7	5.5
6037504001	20.26	39.00	35-40%	5709 Los Angeles	6.1	82.5	11.4	28.5	52.9	3.6	0.2	11.3	3.4
6067002600	20.26	38.98	35-40%	2505 Sacramento	10.7	78.9	10.4	16.4	65.1	7.8	0.8	4.8	5.2
6055201601	20.26	38.97	35-40%	2287 Napa	12.8	68.7	18.5	48.1	48.2	0.2	0.3	1.7	1.5
6079012401	20.26	38.96	35-40%	6621 San Luis Obispo	16.1	75.1	8.8	50.7	43.4	0.8	0.4	2.8	1.8
6055200601	20.25	38.95	35-40%	5016 Napa	12.4	74.9	12.7	36.1	59	0.4	0.3	2.7	1.6
6053001600	20.24	38.93	35-40%	2642 Monterey	12.1	71.7	16.2	37.3	49.9	1.7	0.2	8.1	2.7
6073002804	20.24	38.92	35-40%	4638 San Diego	5.8	84.6	9.6	16.8	66.1	4.4	0.2	8.6	3.8
6037265305	20.23	38.91	35-40%	4082 Los Angeles	1.8	96.9	1.3	8.9	51.6	2.5	0.1	31.8	5
6059011503	20.23	38.90	35-40%	1727 Orange	8.4	71.6	20	14.7	63.2	1.4	0.1	17.8	2.8
6037570901	20.22	38.88	35-40%	5647 Los Angeles	11.7	75.4	12.9	23.9	56	4	0.2	12.4	3.5
6037576503	20.21	38.87	35-40%	4454 Los Angeles	12.6	78.5	8.9	46.9	27.6	14.7	0.4	7.5	2.9
6037195202	20.21	38.86	35-40%	3185 Los Angeles	10.3	78.1	11.6	13.2	67.3	2.2	0.3	13.5	3.5
6037920041	20.21	38.84	35-40%	2871 Los Angeles	17.6	78.6	3.8	38.3	35.8	11.6	0.3	9.7	4.2
6037900609	20.21	38.83	35-40%	5243 Los Angeles	19.1	75.8	5.1	50.9	19.8	23.2	0.3	2.8	2.9
6059052423	20.20	38.82	35-40%	5545 Orange	13.4	81.2	5.4	24.6	53.3	2.1	0.1	16.6	3.2
6113010902	20.19	38.81	35-40%	6189 Yolo	14.2	73.3	12.5	51.9	40.1	1.3	0.7	4	2.1
6111008900	20.18	38.79	35-40%	3590 Ventura	18.4	74.1	7.5	83.1	10.9	1.2	0.3	3.3	1.2
6001442602	20.17	38.78	35-40%	5074 Alameda	15.4	74.3	10.3	24.2	40.5	4.7	0.2	24.3	6.2
6075011100	20.15	38.77	35-40%	5164 San Francisco	2.8	82.1	15.1	9.7	47.6	2.3	0.2	37.2	3.1
6061020805	20.15	38.76	35-40%	3902 Placer	12.1	75.7	12.2	15.8	73.9	1.8	0.5	3.8	4.2
6109004200	20.15	38.74	35-40%	3954 Tuolumne	7.1	62	30.9	6.8	88	0.4	1	1	2.8
6001450400	20.15	38.73	35-40%	5968 Alameda	14.5	75.4	10.1	21.1	55	2.2	0.4	16.5	4.8
6073013903	20.14	38.72	35-40%	4116 San Diego	11.4	68	20.6	39.1	33.6	9.7	0.4	13.3	3.9
6081600500	20.14	38.71	35-40%	7443 San Mateo	11.6	76	12.4	30.6	9.8	2.4	0.1	54.4	2.6
6065050300	20.14	38.69	35-40%	11161 Riverside	18.7	75.9	5.4	26.3	45.5	6.5	0.4	16.8	4.5
6037108102	20.14	38.68	35-40%	3430 Los Angeles	8.5	72.2	19.3	9.7	54.8	1.8	0	31	2.6
6073013909	20.14	38.67	35-40%	4489 San Diego	13.7	78.3	8	53.9	23.9	9.3	0.5	8.7	3.8
6075031202	20.13	38.66	35-40%	3137 San Francisco	9.1	79.6	11.3	17.2	11.2	11.5	0.1	57.9	2.1
6083002809	20.12	38.64	35-40%	5035 Santa Barbara	12.4	72.9	14.7	29.5	59.9	2.2	0.7	4.5	3.1
6111002500	20.12	38.63	35-40%	4795 Ventura	7.7	68.8	23.5	10	84.3	0.8	0.5	2	2.6
6055200302	20.12	38.62	35-40%	2504 Napa	13.2	75.1	11.7	35.4	58.5	0.3	0.4	2.5	2.9
6037703002	20.12	38.61	35-40%	6605 Los Angeles	7.8	68.6	23.6	5.2	12.3	73.8	0.2	3.4	5.2
6073003211	20.11	38.59	35-40%	3165 San Diego	12.4	74.2	13.4	52	15.8	6	0.3	23.3	2.7
6059075405	20.11	38.58	35-40%	2980 Orange	11.5	72.4	16.1	48.9	41.7	1.8	0.2	5.8	1.5
6083002802	20.11	38.57	35-40%	7024 Santa Barbara	12.4	77.2	10.4	37.1	47.9	4.8	0.8	5.9	3.4
6077004105	20.10	38.55	35-40%	4920 San Joaquin	12.3	73.8	13.9	28	64.5	0.4	0.3	5	1.8
6065044521	20.10	38.54	35-40%	1196 Riverside	14	73.9	12.1	30.4	59.4	4.3	2.2	2.1	1.7
6037275602	20.10	38.53	35-40%	6470 Los Angeles	9.7	83.3	7	11.4	49.6	11	0.2	22.7	5.2
6037214400	20.09	38.52	35-40%	2877 Los Angeles	5.1	89.2	5.7	9.2	79.5	2.4	0.1	4.7	4.1
6041129000	20.09	38.50	35-40%	2359 Marin	15.7	75.4	8.9	14.7	25	41.9	0.3	12.2	6
6073003209	20.09	38.49	35-40%	5385 San Diego	16.2	77.4	6.4	26.8	9.1	16	0.2	42.1	5.8
6065042014	20.09	38.48	35-40%	10516 Riverside	15.4	79.8	4.8	28.2	47.8	8.6	0.3	11.8	3.3
6037570001	20.09	38.47	35-40%	4463 Los Angeles	11.5	77.7	10.8	27.3	45.4	6.1	0.2	17.6	3.3
6019005512	20.08	38.45	35-40%	4824 Fresno	15.3	77.1	7.6	20.2	64.7	1.9	0.6	9.4	3.2
6033000501	20.08	38.44	35-40%	3222 Lake	10	68.9	21.1	11.5	79.2	1.7	2.7	0.8	4.1
6111003011	20.07	38.43	35-40%	5397 Ventura	18.1	73.8	8.1	77.6	13.1	2.9	0.3	4.5	1.6
6037403321	20.07	38.42	35-40%	6034 Los Angeles	10.9	77.5	11.6	26.3	25.2	5.2	0.1	40	3.2
6037267100	20.06	38.40	35-40%	6087 Los Angeles	11.6	73.2	15.2	6.1	73.5	2.3	0.1	13.4	4.7
6037189701	20.05	38.39	35-40%	3942 Los Angeles	6.7	82.2	11.1	11.1	71.1	5.2	0.2	8.5	3.9
6037501501	20.05	38.38	35-40%	2244 Los Angeles	10.6	75	14.4	52.7	39.3	1.5	0.3	5	1.2
6007000201	20.03	38.37	35-40%	4052 Butte	12.5	78.5	9	13.4	77.9	1.4	1.4	3.4	2.5
6037273600	20.03	38.35	35-40%	2413 Los Angeles	11	78.8	10.2	17.1	71.6	3.4	0.3	3.8	3.8
6073020208	20.03	38.34	35-40%	2501 San Diego	15.4	77.3	7.3	62.4	32	0.8	0.4	2.9	1.6
6007002900	20.03	38.33	35-40%	3060 Butte	14.6	73.2	12.2	11.4	57.1	0.8	2.7	24.5	3.5
6089012101	20.02	38.32	35-40%	4505 Shasta	14.5	71	14.5	10.1	80.3	0.6	3.4	2	3.6
6095252104	20.02	38.30	35-40%	5536 Solano	13.1	79.9	7	9.9	55.8	7.2	0.3	21.8	5
6095252909	20.02	38.29	35-40%	3235 Solano	13.7	79.6	6.7	16.3	68.3	4.6	0.2	5.7	5
6081609100	20.02	38.28	35-40%	1525 San Mateo	12.9	80.3	6.8	24	61.4	0.8	0.1	9.2	4.5
6075010800	20.01	38.26	35-40%	4578 San Francisco	5.2	76.5	18.3	3.6	46.8	0.9	0.1	46.4	2.3
6063000300	20.01	38.25	35-40%	4760 Plumas	11.7	72.5	15.8	13.3	81.5	0.5	1.6	0.6	2.5
6101050800	20.00	38.24	35-40%	3460 Sutter	11.9	75.3	12.8	13.7	79.8	0.4	1.5	1	3.6
6049000300	19.99	38.23	35-40%	2993 Modoc	9.8	67.7	22.5	11.7	79.9	1.7	3.3	0.8	2.6
6037650604	19.97	38.21	35-40%	5412 Los Angeles	11.9	76.7	11.4	18.3	28.9	5.4	0.3	43.1	4.1
6091010000	19.97	38.20	35-40%	3240 Sierra	8.5	70.6	20.9	8.3	88.1	0.2	1.3	0.4	1.7
6037503801	19.96	38.19	35-40%	4080 Los Angeles	12.3	76.4	11.3	41.2	38	1.5	0.4	16.5	2.5
6023001000	19.96	38.18	35-40%	5906 Humboldt	5	90.2	4.8	15.1	71.6	2.8	1.6	3	5.9
6071000812	19.95	38.16	35-40%	3845 San Bernardino	12.9	73.7	13.4	34.2	54.9	3.3	0.2	4.9	2.5
6067009011	19.95	38.15	35-40%	3964 Sacramento	17.9	75.8	6.3	9.7	53	3.2	0.2	30	4
6065045233	19.95	38.14	35-40%	4244 Riverside	15.1	78.6	6.3	41	49.9	3	0.6	3.9	1.6
6065941100	19.94	38.13	35-40%	2051 Riverside	1.4	31.3	67.3	6.6	89.7	0.7	0.4	1.5	1.1
6071009716	19.93	38.11	35-40%	6974 San Bernardino	17.4	71.6	11	33.4	44.7	15.3	0.6	2.1	4
6065042207	19.92	38.10	35-40%	3017 Riverside	9.2	75	15.8	15	64.8	5.5	0.4	10.9	3.4
6077003602	19.91	38.09	35-40%	3272 San Joaquin	13	74.3	12.7	45.8	47.6	1	0.5	3.1	2
6013392300	19.90	38.08	35-40%	3102 Contra Costa	17.1	75.3	7.6	8.4	9.6	20.1	0.2	56.4	5.2
6065043228	19.90	38.06	35-40%	4108 Riverside	14	79.1	6.9	31	53	4.3	0.3	6.7	4.7
6085509201	19.89	38.05	35-40%	4603 Santa Clara	9.7	80.2	10.1	18.4	46.8	2.7	0.3	27.2	4.6
6059052525	19.89	38.04	35-40%	15473 Orange	12.9	78.7	8.4	8.9	39.7	1.8	0.1	44.5	5
6059062646	19.88	38.02	35-40%	3257 Orange	0.3	21.9	77.8	4.3	82.9	0.6	0.2	10.6	1.4
6085504102	19.88	38.01	35-40%	5480 Santa Clara	15.7	76.1	8.2	71.6	10.7	1.5	0.4	14	1.8
6095251702	19.87	38.00	35-40%	2578 Solano	16	77.9	6.1	16.2	17.8	27.7	0.2	31.1	6.9
6059062622	19.87	37.99	35-40%	4072 Orange	1.5	31.4	67.1	8.1	76.4	1.1	0.2	12.2	2.1

6029005507	19.86	37.97	35-40%	7198 Kern	16.5	73.7	9.8	24.4	48.7	17.5	0.6	3.5	5.3
6053000200	19.86	37.96	35-40%	6884 Monterey	17.5	74.2	8.3	78.6	13.2	1.3	0.3	5.1	1.4
6085503315	19.86	37.95	35-40%	7481 Santa Clara	14.3	78.2	7.5	34.9	8.4	3.4	0.3	50.2	2.7
6037269100	19.86	37.94	35-40%	4359 Los Angeles	14.1	70.6	15.3	4.3	86.1	1.8	0	3.9	3.8
6065043291	19.85	37.92	35-40%	8224 Riverside	11.2	68.1	20.7	20.7	62	3.9	0.4	9.8	3.3
6005000200	19.82	37.91	35-40%	4672 Amador	8.5	69.9	21.6	8.3	86.3	0.4	0.9	0.6	3.4
6081613800	19.82	37.90	35-40%	4005 San Mateo	10	78.4	11.6	25.7	67.9	0.5	0.2	2.7	2.9
6073010401	19.82	37.89	35-40%	2458 San Diego	16.3	77.1	6.6	62.6	25.1	4.1	0.4	4.9	2.9
6071000815	19.82	37.87	35-40%	3584 San Bernardino	10.2	76.5	13.3	23.7	54.5	5.1	0.3	14.2	2.3
6071002013	19.81	37.86	35-40%	4207 San Bernardino	8.6	74.3	17.1	29.7	58.9	5.1	0.1	3.6	2.7
6085505900	19.81	37.85	35-40%	7079 Santa Clara	11.5	73.4	15.1	19.4	51	3.2	0.1	22.6	3.7
6001440304	19.81	37.84	35-40%	4674 Alameda	12.5	76.2	11.3	12.8	12.4	6.2	0.3	62.7	5.6
6037408629	19.80	37.82	35-40%	2926 Los Angeles	9.3	73.4	17.3	22	20.2	0.9	0	55.3	1.6
6111001402	19.78	37.81	35-40%	5677 Ventura	10.9	78.4	10.7	26.8	63.7	1.5	0.6	4.2	3.2
6077005209	19.78	37.80	35-40%	6858 San Joaquin	18	77.6	4.4	30.4	42.5	7.8	0.2	13.8	5.3
6067008009	19.78	37.79	35-40%	4407 Sacramento	10.6	74.4	15	9.7	80	2.5	0.6	3.2	3.9
6001451404	19.77	37.77	35-40%	6610 Alameda	16.8	77.1	6.1	51.5	36.8	1.6	0.4	6.9	2.8
6073018300	19.76	37.76	35-40%	2166 San Diego	5	79.1	15.9	12.4	81.2	1.3	0.5	1.8	2.7
6085508704	19.76	37.75	35-40%	5227 Santa Clara	12.8	82.6	4.6	22.9	29.1	1.5	0.4	42.9	3.1
6083002707	19.76	37.73	35-40%	2287 Santa Barbara	12.2	75.9	11.9	38.1	49.5	4.3	0.9	2.6	4.7
6055200802	19.75	37.72	35-40%	5481 Napa	12.3	71.6	16.1	33.6	60.2	0.4	0.5	3.2	2.1
6037910602	19.75	37.71	35-40%	3995 Los Angeles	18.6	74.3	7.1	58	18.2	17.3	0.2	3.7	2.6
6073020210	19.74	37.70	35-40%	4639 San Diego	14.5	75.4	10.1	46.9	40.1	2.3	0.4	8.2	2.2
6001440100	19.73	37.68	35-40%	2310 Alameda	12.8	67	20.2	16.4	35.9	9.4	0.1	33.5	4.6
6037900508	19.73	37.67	35-40%	3334 Los Angeles	17.7	77.5	4.8	41.3	30	21.4	0.1	4.3	2.9
6005000402	19.72	37.66	35-40%	4740 Amador	8.1	65.4	26.5	8.6	86.1	0.9	1.1	0.9	2.4
6037576802	19.72	37.65	35-40%	3992 Los Angeles	8.1	85	6.9	29.7	49.4	9.6	0.5	6.9	3.9
6067009616	19.72	37.63	35-40%	5814 Sacramento	13.8	77.2	9	19.3	53.1	9.4	0.3	12.2	5.7
6073020209	19.71	37.62	35-40%	4748 San Diego	16.1	67.1	16.8	52.2	34.8	3.8	0.5	6.5	2.1
6037430803	19.71	37.61	35-40%	5439 Los Angeles	9.7	72.4	17.9	9.8	25.4	0.5	0.4	62.3	1.7
6001424001	19.71	37.60	35-40%	3716 Alameda	10.7	82.8	6.5	20.2	33.8	31.3	0.3	8.7	5.7
6065042005	19.71	37.58	35-40%	5102 Riverside	13.6	76.6	9.8	25.3	53.9	6.6	0.3	11.5	2.4
6097154000	19.71	37.57	35-40%	2597 Sonoma	7.8	71.1	21.1	18.1	78.3	0.4	0.4	1.1	1.7
6073008350	19.69	37.56	35-40%	6493 San Diego	11.9	80.4	7.7	10.2	24.7	3.7	0.2	56.9	4.3
6065042742	19.69	37.55	35-40%	4232 Riverside	18.9	76	5.1	35.2	51	3.7	0.3	5.5	4.4
6059042107	19.68	37.53	35-40%	4254 Orange	16.2	78.4	5.4	47.4	47.3	0.5	0.3	2.4	2.1
6073012900	19.67	37.52	35-40%	3374 San Diego	10.9	74.1	15	55.8	37	1.7	0.3	3.2	2
6027000200	19.67	37.51	35-40%	1718 Inyo	6.6	75.2	18.2	10.5	81.4	2.7	2.4	1	1.9
6097153801	19.67	37.50	35-40%	9648 Sonoma	16.6	76.2	7.2	35.9	55.9	0.7	1.2	3.4	2.9
6013370000	19.67	37.48	35-40%	2837 Contra Costa	11.1	74	14.9	19.2	43.2	14.5	0.3	18.2	4.6
6073020307	19.66	37.47	35-40%	7170 San Diego	12	73.8	14.2	28.1	59.3	2.1	0.4	7.4	2.7
6095250200	19.66	37.46	35-40%	4000 Solano	15.1	71.4	13.5	22.3	35.7	18.2	0.8	17.2	5.7
6007001800	19.66	37.44	35-40%	5640 Butte	9.6	64.7	25.7	6.6	88.3	0.4	0.9	1.3	2.4
6111008306	19.65	37.43	35-40%	3714 Ventura	11.3	80.9	7.8	20.5	58.4	2	0.3	16.3	2.5
6073004200	19.65	37.42	35-40%	5673 San Diego	11.1	77.2	11.7	26.5	62.6	3.4	0.2	3.9	3.3
6083000801	19.65	37.41	35-40%	4059 Santa Barbara	14.4	78.2	7.4	75.4	19.4	1.7	0.5	1.9	1
6029002806	19.64	37.39	35-40%	2176 Kern	7.9	82.9	9.2	18.6	56.2	7.4	0.4	14.4	3
6059110117	19.64	37.38	35-40%	5920 Orange	11.3	76.6	12.1	16.3	43.3	4.2	0.2	33.1	2.9
6073001700	19.63	37.37	35-40%	4772 San Diego	11.4	83.6	5	42.3	38.6	10.1	0.8	4.8	3.4
6037108202	19.63	37.36	35-40%	4895 Los Angeles	14.9	72.7	12.4	10.7	40.2	4	0.2	41.5	3.5
6065042743	19.63	37.34	35-40%	1907 Riverside	16.9	76.5	6.6	32.7	53.1	3.3	0.8	7.7	2.5
6037920326	19.62	37.33	35-40%	6840 Los Angeles	14.3	78	7.7	18.6	51.8	4	0.4	21.8	3.4
6001430800	19.62	37.32	35-40%	5394 Alameda	11.1	76	12.9	18.7	55.8	3.1	0.3	18.2	3.9
6081607500	19.61	37.31	35-40%	3636 San Mateo	14.2	76.3	9.5	22.4	44.2	2.4	0	26.6	4.4
6065044915	19.61	37.29	35-40%	6489 Riverside	20.4	73	6.6	85.1	8.6	2	0.3	3.2	0.8
6037131200	19.60	37.28	35-40%	3429 Los Angeles	11.7	76.3	12	36.3	43.7	3.4	0.3	12.1	4.1
6073018510	19.58	37.27	35-40%	2975 San Diego	13.9	75.3	10.8	47.9	36.4	4.1	0.1	8.1	3.5
6001441601	19.56	37.26	35-40%	4561 Alameda	12.6	73.6	13.8	24.1	34.9	4	0.2	31.7	5.1
6079010102	19.56	37.24	35-40%	6989 San Luis Obispo	17.8	74.3	7.9	51.9	42	2.3	0.6	1.3	1.9
6001427700	19.56	37.23	35-40%	4866 Alameda	9.5	79	11.5	11.9	45.6	6.7	0.4	30	5.5
6085503108	19.56	37.22	35-40%	7894 Santa Clara	18.8	74	7.2	33.1	27.9	5.4	0.2	29.5	3.8
6075016200	19.56	37.21	35-40%	2541 San Francisco	3.2	86.7	10.1	13.3	60.3	6.7	0.4	15.5	3.8
6073018518	19.56	37.19	35-40%	3175 San Diego	14.4	77.6	8	61.1	26.4	2.9	0.5	6.1	3
6037408723	19.56	37.18	35-40%	2825 Los Angeles	9.6	78.8	11.6	31.3	11.4	0.9	0.1	54.8	1.5
6059099502	19.56	37.17	35-40%	598 Orange	24.2	73.6	2.2	24.7	46.8	12.7	0	8.2	7.5
6033000900	19.54	37.15	35-40%	6059 Lake	10.5	70	19.5	13.3	79.8	1.6	1.4	1.3	2.6
6059063301	19.54	37.14	35-40%	2941 Orange	8.1	86.2	5.7	13.6	77.5	0.9	0.3	4.4	3.3
6065042004	19.54	37.13	35-40%	3165 Riverside	8.7	75.5	15.8	23.9	63.1	5.3	0.4	4.8	2.5
6095251903	19.54	37.12	35-40%	5308 Solano	13.2	76.1	10.7	26	6.6	37.8	0	25	4.7
6071010421	19.53	37.10	35-40%	6057 San Bernardino	19.1	74.3	6.6	24.4	55.3	8.9	0.8	5.5	5.1
6043000101	19.53	37.09	35-40%	3929 Mariposa	10.1	65.9	24	10.8	81.3	0.9	3	1.2	2.7
6111005906	19.50	37.08	35-40%	6695 Ventura	11.7	71.9	16.4	9.9	75.9	1.3	0.1	9.4	3.4
6085504411	19.50	37.07	35-40%	5450 Santa Clara	13	75.6	11.4	18.2	19.4	1.5	0.3	57.7	2.9
6037265202	19.50	37.05	35-40%	3611 Los Angeles	6.1	73.1	20.8	5.4	68.7	1.3	0.1	19.9	4.6
6007000501	19.50	37.04	35-40%	4333 Butte	8	82.3	9.7	15.3	75.8	1.8	0.5	3.2	3.4
6037910716	19.50	37.03	35-40%	6117 Los Angeles	15.2	78.9	5.9	53.4	24.6	15.5	0.3	3.6	2.6
6013302010	19.49	37.02	35-40%	10039 Contra Costa	14.6	78.8	6.6	28.3	56.4	4.7	0.3	6.2	4
6037108103	19.48	37.00	35-40%	3256 Los Angeles	8.2	75.6	16.2	8.9	56.8	1.5	0	29.9	2.9
6071010413	19.48	36.99	35-40%	5979 San Bernardino	12.3	66.9	20.8	19.8	71.9	2.7	0.8	1.8	3
6065044907	19.48	36.98	35-40%	4989 Riverside	20.5	75.9	3.6	87.3	7.8	1.9	0.1	1.8	1
6037463400	19.47	36.97	35-40%	5752 Los Angeles	9.3	77.7	13	21.7	45.6	6.3	0.2	22.1	4
6019005516	19.47	36.95	35-40%	5527 Fresno	9.9	77.2	12.9	18.7	63.6	2.8	0.3	11.3	3.3
6013359203	19.47	36.94	35-40%	6726 Contra Costa	10.6	75.7	13.7	18.2	17.8	19.6	0.3	39.4	4.7
6027000400	19.47	36.93	35-40%	5668 Inyo	14.3	71.9	13.8	26.7	49.9	0.4	19.1	1.3	2.5
6037265520	19.46	36.92	35-40%	4561 Los Angeles	7.9	77	15.1	5.7	69.3	2.1	0.2	18	4.8
6085504806	19.46	36.90	35-40%	2930 Santa Clara	12.8	74.8	12.4	36.9	17.7	2.1	0.2	40.1	2.9
6073014901	19.45	36.89	35-40%	4243 San Diego	12	74.7	13.3	18.2	63.4	8.4	0.5	4.4	5.1
6037271702	19.45	36.88	35-40%	4134 Los Angeles	13.3	77	9.7	13.8	41	4.2	0.1	36.9	4
6037408503	19.43	36.86	35-40%	6317 Los Angeles	9.4	72.1	18.5	36.2	21.7	1.5	0	39.5	1.1
6037910810	19.43	36.85	35-40%	2765 Los Angeles	12.1	81.8	6.1	24.1	61.9	2.6	0.3	8.7	2.4
6013331000	19.41	36.84	35-40%	7013 Contra Costa	11.5	76.8	11.7	23.7	57.7	2.8	0.3	11.7	3.8
6001451504	19.39	36.83	35-40%	1509 Alameda	11.8	80.8	7.4	17	67.3	2.4	0.1	8.7	4.4
6083002606	19.38	36.81	35-40%	3344 Santa Barbara	27.7	72.1	0.2	18.6	60	8.5	0.2	6.5	6.2
6073014002	19.38	36.80	35-40%	4488 San Diego	14.6	74.7	10.7	39.9	32.9	12.6	0.5	9.8	4.4
6001450603	19.38	36.79	35-40%	4657 Alameda	14.5	75.1	10.4	11.1	64.1	1.2	0.3	19	4.3
6111007800	19.38	36.78	35-40%	4119 Ventura	15.6	76.4	8	38.8	41.8	1.7	0.1	13.8	3.7
6037277000	19.37	36.76	35-40%	5395 Los Angeles	11.3	71.1	17.6	14	66.2	3.3	0.2	11.7	4.7
6001450602	19.37	36.75	35-40%	8722 Alameda	11.8	77	11.2	9	60.1	1.7	0.2	24.8	4.1
6059099417	19.37	36.74	35-40%	4031 Orange	8.4	78.3	13.3	11.2	75.1	0.7	0.3	10.1	2.6
6085504413	19.36	36.73	35-40%	1714 Santa Clara	14.8	67.6	17.6	4	13.9	1.6	0.1	77.5	2.9
6037300200	19.36	36.71	35-40%	5546 Los Angeles	10.3	76.4	13.3	8.9	54.1	0.6	0.2	33.6	2.6
6085508504	19.35	36.70	35-40%	7701 Santa Clara	15.1	76.9	8	18.7	20.8	2.3	0.2	55.7	2.2
6059052524	19.35	36.69	35-40%	7952 Orange	14.7	78.1	7.2	21.1	45.2	2.4	0.1	26.7	4.5
6073003213	19.34	36.68	35-40%	4193 San Diego	10.8	79.1	10.1	20.8	7.8	12.3	0.1	55	3.9
6059099225	19.34	36.66	35-40%	3348 Orange	9.7	72.3	18	8.3	45.8	0.6	0.2	41	3.9
6059110008	19.33	36.65	35-40%	4374 Orange	10.2	72.7	17.1	12	74.1	1.2	0.3	8.6	3.8
6075025403	19.33	36.64	35-40%	4267 San Francisco	12.5	75.9	11.6	37.4	26.3	7.1	0.3	25.9	3
6059011707	19.32	36.63	35-40%	6045 Orange	11.7	76.7	11.6	17	53.1	2.3	0.1	24.9	2.6
6037910707	19.31	36.61	35-40%	4329 Los Angeles	16.5	76.2	7.3	51.3	24.6	18.1	0.4	2.3	3.3
6065041912	19.31	36.60	35-40%	5776 Riverside	13.6	79.9	6.5	25	47.8	3.3	0.2	20.4	3.4
6037139502	19.29	36.59	35-40%	3007 Los Angeles	12.1	69	18.9	8.6	77.3	1.5	0	5.3	7.3
6059011715	19.29	36.57	35-40%	6369 Orange	10.7	67.9	21.4	16.7	65.3	1.1	0.3	13.7	2.8
6073016702	19.29	36.56	35-40%	6944 San Diego	13.6	76	10.4	21.5	70.8	1.4	1.1	1.6	3.5
6053011303	19.29	36.55	35-40%	3775 Monterey	14.6	74.2	11.2	55.2	41.7	0.8	0.2	0.6	1.5
6089012000	19.28	36.54	35-40%	4648 Shasta	15.5	74.4	10.1	12.2	75.2	0.7	4.3	3.3	4.2
6037920013	19.28	36.52	35-40%	4306 Los Angeles	10.1	70.3	19.6	23.6	64.9	1.6	0.3	7.1	2.4
6037700901	19.27	36.51	35-40%	3856 Los Angeles	10.4	76.1	13.5	6.7	72.4	2.3	0	13.2	5.4
6073018611	19.26	36.50	35-40%	8052 San Diego	16.1	73.8	10.1	35.5	44	3.5	0.2	12.9	3.9
6017031200	19.26	36.49	35-40%	5193 El Dorado	9.5	69.7	20.8	12.7	80.7	1	1.3	1.5	2.8
6113010602	19.26	36.47	35-40%	5615 Yolo	5.5	86	8.5	17	55.5	2.5	0.5	19.9	4.6
6073015601	19.25	36.46	35-40%	5937 San Diego	13.6	76.6	9.8	25.7	63.7	3.8	0.5	2.3	4
6037571000	19.25	36.45	35-40%	5747 Los Angeles	12.1	75.6	12.3	23.8	61.6	2.5	0.2	8.2	3.6
6087123300	19.25	36.44	35-40%	1741 Santa Cruz	15.2	75.3	9.5	60.3	36.2	0.3	0.1	1.2	1.8

6071008800	19.24	36.42	35-40%	6382 San Bernardino	15.1	75.6	9.3	32.5	62.8	0.9	0.5	1.1	2.2
6085505700	19.24	36.41	35-40%	5751 Santa Clara	11	81.1	7.9	24.3	52.8	3	0.3	15.9	3.7
6095252706	19.24	36.40	35-40%	3844 Solano	16.8	77.3	5.9	22.5	30.1	16.4	0.4	23.9	6.7
6037141400	19.22	36.39	35-40%	4412 Los Angeles	11.1	68.8	20.1	9.3	78.4	3.4	0.1	5.8	3
6073014601	19.22	36.37	35-40%	4795 San Diego	12.4	73.3	14.3	26.4	53	10.9	0.5	5	4.3
6095252312	19.21	36.36	35-40%	3368 Solano	10.4	74.9	14.7	19.1	48.2	12.6	0.5	13.4	6.3
6111002901	19.21	36.35	35-40%	5455 Ventura	12.6	72.8	14.6	46.8	35.7	3.8	0.2	11.1	2.4
6071010021	19.20	36.33	35-40%	6437 San Bernardino	13.9	72.5	13.6	37.3	55.8	3.3	0.4	1.4	1.9
6067004010	19.20	36.32	35-40%	5131 Sacramento	11.4	72.5	16.1	18.5	31.7	17.3	0.6	26.4	5.6
6075011800	19.20	36.31	35-40%	1500 San Francisco	5.9	69.4	24.7	2.5	7.5	0.8	0.1	88.3	0.8
6037554518	19.19	36.30	35-40%	5435 Los Angeles	9.5	74.9	15.6	9.1	16.5	6.2	0.1	65.3	2.7
6085505305	19.19	36.28	35-40%	5514 Santa Clara	12.8	73.9	13.3	18.1	39	2	0.2	36.8	3.9
6001450101	19.17	36.27	35-40%	4349 Alameda	15.8	80.5	3.7	10.1	38.5	6.4	0.2	38.9	5.9
6073001300	19.16	36.26	35-40%	6197 San Diego	7.6	85.9	6.5	31.1	43.7	12.3	0.3	8	4.5
6067007013	19.16	36.25	35-40%	2779 Sacramento	14.8	78.9	6.3	37.9	26.8	15.4	0.5	13.3	6.2
6037137401	19.16	36.23	35-40%	4157 Los Angeles	13.3	72.8	13.9	9.9	77.2	2.7	0.2	5.5	4.5
6067007428	19.15	36.22	35-40%	3451 Sacramento	14	78.4	7.6	15.4	66.1	5.7	0.4	7.3	5.1
6001403600	19.15	36.21	35-40%	4482 Alameda	7.7	83.7	8.6	9.7	34.4	37.9	0.2	12.3	5.5
6059110007	19.15	36.20	35-40%	4799 Orange	10.4	72.2	17.4	11.3	77.3	0.4	0.3	7.8	3
6001431100	19.14	36.18	35-40%	3225 Alameda	14.1	75.8	10.1	27.8	40.4	13.8	0.2	12.7	5.1
6019004214	19.14	36.17	35-40%	4978 Fresno	10.6	71.5	17.9	21.1	66.3	3.6	0.3	5.8	2.9
6019006403	19.14	36.16	35-40%	6304 Fresno	11	72.9	16.1	16.1	77	1.1	1.8	1.4	2.7
6071000108	19.14	36.15	35-40%	5077 San Bernardino	12.8	82.1	5.1	25.7	42.4	5.4	0.1	23.3	3.1
6095252313	19.13	36.13	35-40%	5065 Solano	10.3	65.4	24.3	15.1	45.2	15.8	0.6	16.7	6.6
6007003501	19.13	36.12	35-40%	3222 Butte	14.9	70.6	14.5	29.1	62.9	0.7	0.7	3.7	2.9
6059074107	19.13	36.11	35-40%	5512 Orange	11.2	80.5	8.3	35.9	37	1.9	0.1	22.4	2.6
6001423000	19.13	36.10	35-40%	4396 Alameda	7.7	80.4	11.9	10.2	60.4	7.5	0.3	16.1	5.6
6037901102	19.12	36.08	35-40%	5557 Los Angeles	12.7	78.3	9	26.3	57.2	9	0.7	3.7	3.1
6073015100	19.12	36.07	35-40%	4769 San Diego	11.4	73.7	14.9	17.3	70.5	3.7	0.3	4.5	3.7
6059011402	19.11	36.06	35-40%	2325 Orange	12.2	68.9	18.9	19.7	67.7	0.9	0.1	8.7	2.9
6065042716	19.11	36.04	35-40%	5033 Riverside	11.3	73.9	14.8	16.8	77.5	1.5	0.1	1.8	2.2
6073019503	19.10	36.03	35-40%	4795 San Diego	16.5	79.3	4.2	57.5	32.2	3.4	0.4	4.1	2.4
6073003103	19.10	36.02	35-40%	6256 San Diego	13.4	75.7	10.9	42.7	8	34.1	0.1	12.1	3
6037274202	19.10	36.01	35-40%	4337 Los Angeles	5.9	74	20.1	6.3	82.1	3.5	0.1	5	3
6097153901	19.08	35.99	35-40%	5421 Sonoma	10.3	72.6	17.1	25.8	68.4	0.8	0.6	2.3	2.1
6037700300	19.08	35.98	35-40%	5623 Los Angeles	2.5	84.3	13.2	9.3	79.7	2.9	0.1	5	2.9
6037137502	19.07	35.97	35-40%	4202 Los Angeles	11.6	70.2	18.2	9.9	75.2	4.2	0.2	5.7	4.8
6059099604	19.07	35.96	35-40%	3606 Orange	11.4	74.4	14.2	14.1	69.3	0.4	0.5	12.4	3.3
6033000702	19.07	35.94	35-40%	4029 Lake	13.5	72	14.5	23	64.7	4.2	2	0.8	5.2
6037101300	19.06	35.93	35-40%	4199 Los Angeles	8.8	73.3	17.9	12	76	1	0.1	7.6	3.3
6071009717	19.05	35.92	35-40%	4018 San Bernardino	12.4	73.3	14.3	24.7	63.2	5.9	0.2	2.9	3.1
6083002205	19.04	35.91	35-40%	4997 Santa Barbara	19.1	69.6	11.3	70.3	21.5	1.4	0.2	4.6	2
6037431700	19.04	35.89	35-40%	6433 Los Angeles	9	72.3	18.7	5.2	20.6	0.6	0	72	1.6
6001435200	19.04	35.88	35-40%	4140 Alameda	11	77.7	11.3	22	29.9	25.2	0.2	16.6	6.1
6113011001	19.03	35.87	35-40%	6464 Yolo	16.3	71.5	12.2	50.7	40.9	1.7	0.7	3.9	2.1
6001436000	19.02	35.86	35-40%	4557 Alameda	12.9	74.7	12.4	40.1	36.9	3	0.4	16.5	3.2
6037300600	19.02	35.84	35-40%	8053 Los Angeles	10.8	73.6	15.6	11.7	59.9	0.7	0.2	24.3	3.2
6073002301	19.01	35.83	35-40%	2821 San Diego	14.3	78.6	7.1	37.3	20.8	12.7	0.2	25.3	3.7
6037135202	19.01	35.82	35-40%	4255 Los Angeles	10.9	73.4	15.7	15.5	67.1	2.8	0.2	10.9	3.5
6085512032	19.01	35.81	35-40%	3389 Santa Clara	14.8	76.4	8.8	34.3	41	3.3	0.5	16.5	4.5
6001450743	19.01	35.79	35-40%	4734 Alameda	16.3	79.4	4.3	15.3	31.1	3.3	0.3	46	4
6085505304	19.00	35.78	35-40%	3265 Santa Clara	11.8	74.4	13.8	20.9	39.5	1	0.4	32.6	5.6
6073009604	19.00	35.77	35-40%	3179 San Diego	11	73	16	19	66.8	3.3	0.6	6.2	4.1
6071000118	18.99	35.75	35-40%	4541 San Bernardino	10.7	80.9	8.4	20.5	25	3	0.2	48.5	2.8
6067008127	18.99	35.74	35-40%	4792 Sacramento	14.6	77.8	7.6	19.5	68.3	2.9	0.8	4.5	4.1
6075016000	18.99	35.73	35-40%	2465 San Francisco	2.3	74.6	23.1	9.7	49.6	4.9	0.2	31.7	4
6071009713	18.99	35.72	35-40%	7063 San Bernardino	15.6	74.3	10.1	33.1	55.4	6.1	0.5	2	2.9
6019004405	18.98	35.70	35-40%	4040 Fresno	9.4	77.3	13.3	16.4	68	2.5	0.3	9.8	2.9
6037143603	18.98	35.69	35-40%	2222 Los Angeles	6.5	86.2	7.3	12.5	71.7	4.9	0.3	7.1	3.6
6037462400	18.96	35.68	35-40%	4229 Los Angeles	11.9	74.1	14	30.9	50.8	6.5	0.2	7.9	3.8
6111004505	18.96	35.67	35-40%	2150 Ventura	17.7	74.2	8.1	81.7	8.7	2.2	0	6.5	0.9
6029005501	18.96	35.65	35-40%	6275 Kern	10.4	71.2	18.4	9.5	82.2	1.5	0.9	2.8	3
6073018511	18.95	35.64	35-40%	5003 San Diego	15.3	77.9	6.8	43.8	42.9	4.3	0.3	5.9	2.9
6023001200	18.95	35.63	35-40%	4686 Humboldt	6.3	85.9	7.8	11.7	77.1	1.3	2	2.8	5
6059001102	18.94	35.62	35-40%	3144 Orange	12	77	11	46.2	41.3	0.7	0.6	9.2	2
6071009710	18.93	35.60	35-40%	7120 San Bernardino	19.2	73.2	7.6	38.9	41	12.9	0.7	2.9	3.6
6067009311	18.93	35.59	35-40%	6407 Sacramento	14.8	77.9	7.3	20.1	37.4	8.9	0.6	27.8	5.1
6079010202	18.93	35.58	35-40%	5491 San Luis Obispo	14.5	70.7	14.8	36.9	57.2	1.7	0.4	2.1	1.8
6037403320	18.92	35.57	35-40%	5573 Los Angeles	9.2	81.3	9.5	13.4	15.9	3.7	0.1	64.2	2.7
6037400900	18.92	35.55	35-40%	4086 Los Angeles	12	75.8	12.2	27.5	58.7	1.3	0.3	9.8	2.4
6085512022	18.91	35.54	35-40%	5374 Santa Clara	14.9	75.3	9.8	38	25.3	4.3	0.3	29	3
6073007600	18.91	35.53	35-40%	5607 San Diego	3.1	85.9	11	8.2	85.3	0.9	0.3	2.6	2.6
6081601605	18.91	35.52	35-40%	6189 San Mateo	9.7	74.4	15.9	9.6	9.6	2.5	0	75.1	3.1
6095252911	18.91	35.50	35-40%	4912 Solano	5.2	46.6	48.2	12	73.8	6.6	0.4	4.4	2.7
6097151308	18.91	35.49	35-40%	4796 Sonoma	8.4	72.3	19.3	14.5	74.8	1.5	0.5	5.4	3.3
6067002300	18.89	35.48	35-40%	3156 Sacramento	10.8	76.3	12.9	10.5	75.8	1.3	0.3	7.6	4.4
6067009317	18.89	35.46	35-40%	5700 Sacramento	13.9	79.2	6.9	25.4	34.8	13.5	0.4	20.6	5.2
6061021401	18.89	35.45	35-40%	2569 Placer	15.8	72.8	11.4	32.9	63.4	0.1	1.2	0.4	2
6013330000	18.87	35.44	35-40%	5353 Contra Costa	11.7	76.5	11.8	28.2	55.7	2.4	0.5	9.4	3.8
6067007209	18.86	35.43	35-40%	3695 Sacramento	12.8	76.9	10.3	18	73.3	1.6	1.6	2.2	3.3
6065044515	18.86	35.41	35-40%	3618 Riverside	17.6	68.6	13.8	72.8	23.3	2	0.4	1	0.4
6073009510	18.86	35.40	35-40%	5087 San Diego	33.5	66.1	0.4	23.2	53.8	9.3	0.6	4.9	8.2
6023011000	18.85	35.39	35-40%	4386 Humboldt	12.7	68.3	19	13.3	79.9	0.3	2.2	0.8	3.5
6067008130	18.85	35.38	35-40%	3761 Sacramento	12.8	75.1	12.1	15.6	69.2	5.8	0.9	4.4	4.1
6085500600	18.84	35.36	35-40%	4586 Santa Clara	11.2	80.1	8.7	27.2	50	5.8	0.3	13.3	3.3
6029003812	18.84	35.35	35-40%	4367 Kern	13.7	71.1	15.2	23.2	63.9	3.1	1.1	6.2	2.4
6073012304	18.84	35.34	35-40%	3434 San Diego	11.8	74.4	13.8	52.9	35.4	3	0.6	5.1	3
6059032061	18.84	35.33	35-40%	3349 Orange	9.1	67.7	23.2	7.5	83.8	0.8	0.2	6	1.8
6017031502	18.84	35.31	35-40%	6031 El Dorado	10.1	67.7	22.2	13.2	80.7	0.4	1.6	0.9	3.3
6073009511	18.84	35.30	35-40%	4427 San Diego	35.1	64.7	0.2	25.9	48.1	12.3	0.8	4.8	8.2
6037139701	18.83	35.29	35-40%	4920 Los Angeles	12.2	66.4	21.4	6.5	83.2	1.8	0.1	5.9	2.6
6065043247	18.83	35.28	35-40%	8838 Riverside	16.8	78.5	4.7	28	44.7	8	0.6	14.1	4.6
6067009308	18.82	35.26	35-40%	6032 Sacramento	11.3	74.7	14	21.9	61.7	3.7	0.7	8.2	3.8
6085506305	18.81	35.25	35-40%	7191 Santa Clara	16	75.8	8.2	40.6	29.4	6.5	0.3	20.3	3
6059042313	18.81	35.24	35-40%	6471 Orange	10.3	79.3	10.4	30.8	63.8	0.7	0.4	2.3	1.9
6075015900	18.80	35.23	35-40%	4350 San Francisco	4.2	75.9	19.9	8.1	36.3	12.9	0.1	38	4.6
6037800504	18.80	35.21	35-40%	2497 Los Angeles	8.2	73.5	18.3	6	86.5	1.3	0.3	3.6	2.2
6081610900	18.79	35.20	35-40%	6932 San Mateo	14.6	79.4	6	56.4	32.5	1.9	0.3	5.8	3
6059099305	18.79	35.19	35-40%	7143 Orange	10.7	83.5	5.8	25.3	63.4	1	0.3	6.6	3.4
6009000220	18.78	35.17	35-40%	5515 Calaveras	11.2	75	13.8	12.2	80.5	0.9	1.5	1.8	3.1
6037910505	18.78	35.16	35-40%	3064 Los Angeles	17.4	77.4	5.2	66.1	18.6	10.5	0.5	2.1	2.2
6037265303	18.77	35.15	35-40%	4523 Los Angeles	0.8	98.1	1.1	13.6	39.6	2.2	0.1	39.2	5.3
6079012200	18.77	35.14	35-40%	7024 San Luis Obispo	13.3	74.8	11.9	49.1	46.2	0.4	0.5	2	1.8
6037273700	18.77	35.12	35-40%	2801 Los Angeles	10.7	78.7	10.6	23.6	65.9	1.7	0.3	4.6	3.9
6059062800	18.76	35.11	35-40%	4220 Orange	5.5	73.6	20.9	6.4	88.6	0.8	0.3	2.2	1.7
6037267402	18.75	35.10	35-40%	4580 Los Angeles	4.9	81.9	13.2	13.4	64.4	2.9	0.2	14.5	4.6
6111007901	18.75	35.09	35-40%	5401 Ventura	14.3	79	6.7	39	47.2	0.9	0.3	9.4	3.2
6073017502	18.74	35.07	35-40%	3641 San Diego	13.7	73.4	12.9	34.7	58.6	0.7	0.2	3.1	2.7
6073017900	18.74	35.06	35-40%	6958 San Diego	10.8	74.2	15	36.1	56.9	0.9	0.4	3.2	2.4
6085509404	18.74	35.05	35-40%	6076 Santa Clara	13	78.5	8.5	31.6	32.6	1.6	0.1	31	3.1
6059110102	18.72	35.04	35-40%	5780 Orange	9.5	76	14.5	17.9	32.5	3.3	0.2	42.9	3.2
6093000400	18.71	35.02	35-40%	652 Siskiyou	6.9	68.1	25	5.5	83.4	0	4.3	0.5	6.3
6111002600	18.71	35.01	35-40%	3211 Ventura	11.8	80.3	7.9	31.2	61.6	1	0.8	2.1	3.3
6001441927	18.70	35.00	30-35%	4103 Alameda	14.3	74.6	11.1	11.8	20.4	5.5	0.1	57.6	4.6
6085512505	18.68	34.99	30-35%	7295 Santa Clara	18.1	76	5.9	61.4	26.1	1.5	0.5	8	2.5
6111006900	18.68	34.97	30-35%	3520 Ventura	10.1	65.3	24.6	21.3	65.7	1.3	0.5	8.9	2.3
6037571101	18.67	34.96	30-35%	4574 Los Angeles	12.2	77.1	10.7	26.8	56.9	3.8	0.2	8.7	3.6
6059099233	18.67	34.95	30-35%	3419 Orange	10.1	72.8	17.1	10.6	53.6	0.6	0.4	30.9	3.9
6037403403	18.67	34.94	30-35%	5140 Los Angeles	7.2	81.2	11.6	13.8	10.6	2.4	0	71.3	1.9
6013303202	18.67	34.92	30-35%	7080 Contra Costa	16.3	77.6	6.1	24.1	59	5.8	0.4	5.8	4.8
6061021802	18.67	34.91	30-35%	5676 Placer	9.4	67.5	23.1	10.9	82.7	0.6	0.8	1.7	3.3
6077004307	18.67	34.90	30-35%	3753 San Joaquin	13.6	73.7	12.7	32	58.1	0.8	0.5	6.5	2.1
6013363000	18.65	34.88	30-35%	7043 Contra Costa	11.2	77.3	11.5	23.8	32.1	21.3	0.3	17.2	5.3

6071010023	18.65	34.87	30-35%	5949 San Bernardino	15.2	77.3	7.5	44.8	48.8	2.4	0.6	1.1	2.2
6071009107	18.65	34.86	30-35%	7272 San Bernardino	11.9	75.5	12.6	23.9	70.3	0.7	0.4	2.6	2
6083002304	18.64	34.85	30-35%	6687 Santa Barbara	22.6	72	5.4	89.9	5.6	0.8	0.3	2.9	0.6
6075031302	18.64	34.83	30-35%	5495 San Francisco	8.8	79.6	11.6	12.8	14	15.2	0.3	54.4	3.3
6113010312	18.64	34.82	30-35%	5130 Yolo	13.9	77.8	8.3	19.4	62.2	2.7	0.3	10.2	5.2
6113011300	18.64	34.81	30-35%	8106 Yolo	13.4	77	9.6	51.6	44.2	0.7	0.5	0.9	2.1
6059099602	18.63	34.80	30-35%	3196 Orange	12.8	76.5	10.7	21.8	55.9	1.5	0.3	16.2	4.3
6037573902	18.62	34.78	30-35%	2091 Los Angeles	7.8	72.5	19.7	13.1	68.7	4	0	10.4	3.8
6073013414	18.61	34.77	30-35%	7227 San Diego	12.2	77.9	9.9	50.9	24	3.2	0.2	18.1	3.5
6073006000	18.61	34.76	30-35%	3536 San Diego	4.4	74.5	21.1	12.8	77.6	2.1	0.2	4.8	2.5
6071009202	18.61	34.75	30-35%	2295 San Bernardino	8.6	76.2	15.2	17.2	68.5	2.1	0.5	9.5	2.2
6065044931	18.60	34.73	30-35%	2327 Riverside	15.5	76.8	7.7	66.6	21.2	1.8	0.1	9.2	1.1
6037700802	18.59	34.72	30-35%	4069 Los Angeles	7.7	74.4	17.9	5.7	75.8	2.1	0.1	11	5.3
6001433500	18.59	34.71	30-35%	4352 Alameda	11.9	72.1	16	24.1	32.3	4	0.2	36.5	2.9
6037920031	18.59	34.70	30-35%	5301 Los Angeles	8.4	57.9	33.7	21.4	63.5	3.1	0.1	10	2
6007002300	18.59	34.68	30-35%	5331 Butte	8.5	64.1	27.4	6.5	88.1	0.3	1.2	1.4	2.6
6065049100	18.58	34.67	30-35%	5264 Riverside	12.9	65.9	21.2	45.9	48.4	2.4	0.4	1.7	1.2
6075010100	18.57	34.66	30-35%	3739 San Francisco	5.8	75.1	19.1	7.6	46.1	6.5	0.1	36.5	3.2
6029006003	18.56	34.64	30-35%	5580 Kern	16.6	74.3	9.1	22.4	70	1.7	0.9	1.3	3.6
6037930401	18.56	34.63	30-35%	2471 Los Angeles	11.1	75.2	13.7	10.9	74.8	3.5	0.3	6.9	3.6
6067008007	18.56	34.62	30-35%	3151 Sacramento	11.2	68.4	20.4	13.1	75.6	3.6	0.9	3.6	3.2
6037297400	18.55	34.61	30-35%	3603 Los Angeles	7.9	61.4	30.7	15.3	75.2	1.9	0.3	4.4	2.9
6055201006	18.55	34.59	30-35%	3283 Napa	12.3	77	10.7	26.3	44.1	4.9	0.7	18.7	5.3
6001400500	18.55	34.58	30-35%	3517 Alameda	9	82.1	8.9	9.7	50.6	26.5	0.5	6	6.8
6073008701	18.54	34.57	30-35%	3361 San Diego	20.1	73.6	6.3	19.2	45.5	10.4	0.6	17.8	6.5
6111008001	18.53	34.56	30-35%	3331 Ventura	12.1	77.4	10.5	30.9	57.9	1.7	0.5	6.4	2.7
6081601100	18.53	34.54	30-35%	5716 San Mateo	9.1	73.8	17.1	12.4	22.1	2.1	0.1	60.1	3.1
6065941200	18.52	34.53	30-35%	2205 Riverside	4.4	60.6	35	15.2	76.9	2.2	0.4	3.4	1.9
6075026004	18.51	34.52	30-35%	4315 San Francisco	10.9	77.1	12	37.6	13.3	1	0.1	45.9	2.1
6037271300	18.51	34.51	30-35%	4506 Los Angeles	9	74.7	16.3	19.2	52.9	2.5	0.1	20.6	4.8
6067007414	18.51	34.49	30-35%	4317 Sacramento	18.1	75.8	6.1	24.9	52.7	10.5	0.6	5.8	5.5
6037480011	18.50	34.48	30-35%	5132 Los Angeles	12	76.5	11.5	33	19	1.9	0.1	44.6	1.4
6071000115	18.50	34.47	30-35%	7114 San Bernardino	16.3	78.4	5.3	28.9	28.1	5.4	0	34.5	3.1
6037503703	18.49	34.46	30-35%	7876 Los Angeles	8.8	67.2	24	20.4	30.9	1.8	0.2	44.8	1.9
6073016615	18.48	34.44	30-35%	3059 San Diego	12.1	82.4	5.5	19.9	63.6	6.7	0.8	5.8	3.1
6111007512	18.47	34.43	30-35%	5355 Ventura	13.3	79.5	7.2	17.2	64.9	1.6	0.2	12	4.2
6085500500	18.46	34.42	30-35%	5275 Santa Clara	12.1	73	14.9	25.3	56.7	2.2	0.5	11.9	3.5
6037181500	18.46	34.41	30-35%	3812 Los Angeles	10.8	76.9	12.3	42.2	31.4	1.4	0.4	21.4	3.2
6075010300	18.46	34.39	30-35%	3852 San Francisco	4.6	77.9	17.5	5.1	60.7	0.9	0.1	30.5	2.6
6037554513	18.45	34.38	30-35%	2507 Los Angeles	9.4	73.7	16.9	8.8	9.8	9.5	0.2	69.8	1.9
6079010300	18.45	34.37	30-35%	10043 San Luis Obispo	11.6	75.1	13.3	21.8	73.7	0.8	0.6	0.8	2.2
6073018514	18.45	34.35	30-35%	7947 San Diego	11.4	75.9	12.7	22	55.8	6.7	0.3	11.4	3.8
6067007421	18.45	34.34	30-35%	9003 Sacramento	15.3	78.6	6.1	13.1	58.8	5.6	0.3	17.2	4.9
6037271902	18.44	34.33	30-35%	3877 Los Angeles	9	78.9	12.1	23.9	56	3.2	0.1	12.5	4.3
6041106001	18.43	34.32	30-35%	4048 Marin	7.6	71.8	20.6	14.9	68	3.5	0.3	9.6	3.8
6005000102	18.41	34.30	30-35%	1867 Amador	7.3	69.8	22.9	8	87	0	1.7	1.1	2.3
6061020401	18.41	34.29	30-35%	2129 Placer	10.1	75.8	14.1	12.2	80	1.5	0.8	1	4.6
6071009711	18.40	34.28	30-35%	9401 San Bernardino	11.4	72.1	16.5	23.9	59	9	0.5	5.1	2.5
6085512020	18.39	34.27	30-35%	6858 Santa Clara	14.5	80	5.5	36.3	22	5.2	0.2	33.2	3.1
6067005403	18.38	34.25	30-35%	2224 Sacramento	2.4	59.8	37.8	6.1	75	1.7	0.1	14.7	2.3
6067003300	18.38	34.24	30-35%	4073 Sacramento	9.6	67.6	22.8	12.1	60.3	2.7	0.4	20.8	3.7
6067005606	18.37	34.23	30-35%	4029 Sacramento	11	72.4	16.6	15.7	67.7	6	0.4	5.7	4.4
6075060700	18.37	34.22	30-35%	9083 San Francisco	5.9	88	6.1	8.3	44.8	3.6	0.2	38.8	4.2
6007000202	18.37	34.20	30-35%	3723 Butte	13.3	65.8	20.9	14.8	74.4	2.8	1.6	2.2	4.2
6059052415	18.37	34.19	30-35%	3944 Orange	9.9	77.7	12.4	12.9	73.9	1.1	0.2	9	3
6037134905	18.36	34.18	30-35%	2819 Los Angeles	8.5	82.7	8.8	12.6	61.2	8.7	0.3	12.6	4.6
6073016901	18.36	34.17	30-35%	6909 San Diego	14.4	70.2	15.4	14.1	77.9	2.7	0.7	2	2.6
6013359104	18.35	34.15	30-35%	1932 Contra Costa	10.4	79.4	10.2	13.1	22.7	26.1	0.4	32.7	5
6037571800	18.35	34.14	30-35%	3190 Los Angeles	9	71	20	16.4	59.5	8.7	0.2	11.3	3.9
6029003803	18.33	34.13	30-35%	4769 Kern	15.4	77.7	6.9	20	70.8	1.3	0.6	4.5	2.7
6085509107	18.32	34.12	30-35%	4892 Santa Clara	15.2	82.2	2.6	34	19.3	3.3	0.2	40.2	3
6037910705	18.32	34.10	30-35%	11415 Los Angeles	18	77.3	4.7	63.2	12.4	18.1	0.2	4	2
6085504320	18.32	34.09	30-35%	2903 Santa Clara	11.8	75.6	12.6	11.6	15.9	1.2	0	67.9	3.3
6037403304	18.31	34.08	30-35%	5178 Los Angeles	7.8	76.2	16	13.4	15.8	2.8	0	65.9	2.1
6001441301	18.30	34.06	30-35%	3179 Alameda	14.3	77.2	8.5	9.6	26.1	4.2	0.2	54.7	5.3
6067007906	18.30	34.05	30-35%	3525 Sacramento	10.2	73.3	16.5	10.4	77.8	3.8	0.6	3.4	4
6059001601	18.30	34.04	30-35%	7989 Orange	12	64	24	23.3	56.4	1.5	0.2	16.1	2.5
6073008358	18.29	34.03	30-35%	6554 San Diego	10.2	76.6	13.2	15.7	30.9	4	0.1	44.9	4.5
6071002010	18.29	34.01	30-35%	9013 San Bernardino	17.4	78.9	3.7	38	33.3	13.3	0.1	12.2	3.1
6037462500	18.29	34.00	30-35%	6039 Los Angeles	11.6	73	15.4	17.2	63.9	3.8	0.1	10.5	4.6
6085503509	18.29	33.99	30-35%	4040 Santa Clara	14.7	77.9	7.4	63.1	7.6	2.3	0.3	25	1.6
6081601902	18.28	33.98	30-35%	5639 San Mateo	11.6	77.3	11.1	33.1	22.6	2.3	0.2	36.9	4.8
6073019405	18.28	33.96	30-35%	3592 San Diego	15.9	79.9	4.2	52.3	33.9	4.8	0.4	5.4	3.2
6001400600	18.28	33.95	30-35%	1571 Alameda	7.9	82.9	9.2	8	42.7	39.1	0.3	5.1	4.8
6111008002	18.27	33.94	30-35%	4827 Ventura	14.3	77.8	7.9	35.2	56.1	0.9	0.3	5.2	2.4
6053014700	18.27	33.93	30-35%	6620 Monterey	13.9	74.7	11.4	49.6	41.6	0.9	0.2	4.4	3.2
6111004101	18.27	33.91	30-35%	6814 Ventura	18.8	74.2	7	86.6	6.6	1.5	0.2	4.1	1
6037571503	18.26	33.90	30-35%	3700 Los Angeles	12.7	76	11.3	31.5	22.4	17.4	0.6	24.5	3.6
6073002702	18.26	33.89	30-35%	5180 San Diego	11.8	78.5	9.7	29.6	34.5	18.2	0.5	13.3	3.9
6059001403	18.24	33.88	30-35%	3239 Orange	10.2	71.3	18.5	31.6	58.8	0.6	0.3	6.3	2.3
6037401902	18.24	33.86	30-35%	5711 Los Angeles	8.7	62.6	28.7	14.6	70	3.7	0.2	8.7	2.9
6059011709	18.23	33.85	30-35%	4355 Orange	9	72.8	18.2	15.9	71	1.3	0.1	9.7	2
6037273402	18.23	33.84	30-35%	3172 Los Angeles	3.9	87.5	8.6	9.8	77.6	3.5	0.4	4.7	3.9
6085511911	18.22	33.83	30-35%	4806 Santa Clara	9.4	76.9	13.7	11.3	61.5	3.9	0.4	19.1	3.8
6065941400	18.22	33.81	30-35%	3179 Riverside	8.4	65.7	25.9	32.5	56.6	4.6	0.6	3.7	2
6037106641	18.22	33.80	30-35%	2317 Los Angeles	9.3	73.7	17	13	65.5	2.4	0.3	15.6	3.3
6037113211	18.22	33.79	30-35%	3787 Los Angeles	8.5	72.6	18.9	12.3	69.4	2.7	0.2	12.3	3.1
6111003802	18.22	33.77	30-35%	2888 Ventura	19.4	72.3	8.3	88.1	7.1	2.2	0	1.6	1
6087100200	18.21	33.76	30-35%	7071 Santa Cruz	10.6	81.5	7.9	25.6	63.6	1.9	0.3	4.7	3.9
6043000102	18.21	33.75	30-35%	2719 Mariposa	9.6	68.4	22	9.1	83.3	0.7	2.7	1.4	2.7
6111005503	18.20	33.74	30-35%	3336 Ventura	14.3	66.7	19	25.6	58.8	3.1	0.2	8	4.3
6073009603	18.20	33.72	30-35%	4533 San Diego	6.2	80.9	12.9	20.8	58	7	0.4	9.4	4.4
6071010412	18.20	33.71	30-35%	7720 San Bernardino	13.4	70.3	16.3	16.7	74.1	2.9	0.8	2.9	2.5
6059052518	18.20	33.70	30-35%	2688 Orange	5.8	92.9	1.3	9.9	60.6	2.7	0.2	21.2	5.5
6073019905	18.18	33.69	30-35%	4256 San Diego	10.1	74.9	15	18.7	68	3.1	0.3	6.7	3.3
6073019303	18.18	33.67	30-35%	6538 San Diego	12.5	76.4	11.1	32.3	55.6	3	0.3	4.9	3.8
6045011700	18.17	33.66	30-35%	4181 Mendocino	11.2	72.9	15.9	25.6	60.1	0.6	3.9	7.9	1.9
6073003214	18.17	33.65	30-35%	4610 San Diego	15.1	76.4	8.5	33	15.5	21.3	0	25.2	4.9
6037901010	18.15	33.64	30-35%	5913 Los Angeles	15.3	76.2	8.5	35	41.5	16.1	0.5	3.6	3.3
6037430302	18.15	33.62	30-35%	5837 Los Angeles	11.4	75.5	13.1	22	63.9	3.2	0.2	7.6	3.1
6001451202	18.15	33.61	30-35%	3634 Alameda	12.3	81.3	6.4	20.6	65.5	1.2	0.4	8.9	3.4
6085505401	18.15	33.60	30-35%	5957 Santa Clara	14.1	76.9	9	16.1	26.3	2.3	0.2	51.6	3.4
6071002029	18.14	33.59	30-35%	6077 San Bernardino	11.7	82	6.3	33.3	48.2	5.9	0.2	9.5	2.9
6065043007	18.13	33.57	30-35%	6811 Riverside	17.4	78.3	4.3	31.9	53.1	6	0.2	5.3	3.5
6027000500	18.13	33.56	30-35%	2568 Inyo	10.1	70	19.9	11.2	65.2	0.4	19.6	0.9	2.7
6007003100	18.13	33.55	30-35%	4396 Butte	12.2	67.2	20.6	9.8	75.4	1.9	4.8	4.4	3.8
6007002100	18.13	33.54	30-35%	4599 Butte	8.9	69.5	21.6	8.5	85.4	0.6	1.1	1.6	2.9
6037276603	18.13	33.52	30-35%	5252 Los Angeles	5.7	84.1	10.2	10.6	66.1	6	0.2	12	5.1
6073019904	18.12	33.51	30-35%	6538 San Diego	10.5	75.9	13.6	22.2	63.2	3.2	0.2	7.8	3.4
6067007430	18.12	33.50	30-35%	7805 Sacramento	16.2	78	5.8	15.4	56.9	11.5	0.6	10.1	5.6
6001444200	18.10	33.48	30-35%	6499 Alameda	13.9	75.6	10.5	35.7	29.2	3.8	0.3	26.4	4.6
6115041000	18.10	33.47	30-35%	7357 Yuba	10.1	73	16.9	12.5	78.7	0.7	1.7	2.5	4
6055201200	18.08	33.46	30-35%	4739 Napa	8.6	65.7	25.7	23.4	71.5	0.3	0.5	2.2	2.1
6037702202	18.08	33.45	30-35%	3751 Los Angeles	9.9	74.6	15.5	14.1	71.7	2.7	0.2	7.3	3.9
6015000201	18.08	33.43	30-35%	7026 Del Norte	5.5	85.3	9.2	30.7	49.3	12.3	3.1	0.9	3.7
6085512510	18.07	33.42	30-35%	6194 Santa Clara	14.9	72.7	12.4	41.9	44.7	1.3	0.3	9.2	2.6
6111001002	18.07	33.41	30-35%	6834 Ventura	11.1	71.5	17.4	25.2	69.9	0.6	0.8	1.5	2.1
6055200704	18.06	33.40	30-35%	4514 Napa	13.6	71.2	15.2	41.6	54.5	0.4	0.2	1.4	1.9
6017031100	18.06	33.38	30-35%	5462 El Dorado	11.4	69.5	19.1	11.1	83.7	0.1	0.8	1	3.3
6015000202	18.06	33.37	30-35%	3655 Del Norte	10.7	70.3	19	16.7	72.1	0.3	7	0.9	2.9
6013389200	18.06	33.36	30-35%	1714 Contra Costa	9.3	82.2	8.5	20.2	30.2	10.9	0.5	34.3	3.9
6073018507	18.05	33.35	30-35%	9097 San Diego	15.8	73	11.2	45.2	35.6	4.7	0.2	10.8	3.5
6085512314	18.05	33.33	30-35%	5932 Santa Clara	15.8	74.4	9.8	48.3	39.9	1.5	0.4	7.1	2.8

6111003608	18.05	33.32	30-35%	3838 Ventura	16.6	76.8	6.6	70.8	16.7	2.3	0.3	8	1.9
6071000820	18.05	33.31	30-35%	3958 San Bernardino	8.8	76.2	15	22.6	63.3	3.7	0.2	7.9	2.3
6059032015	18.05	33.30	30-35%	6548 Orange	9.1	73.1	17.8	20.4	63.1	1.5	0.2	11.5	3.3
6019005703	18.04	33.28	30-35%	5176 Fresno	9.4	76.8	13.8	19.5	67.7	1.3	0.7	8.3	2.4
6001401200	18.03	33.27	30-35%	2416 Alameda	8.2	83.5	8.3	9.4	58.4	17.4	0.2	9.4	5.2
6085503511	18.03	33.26	30-35%	3665 Santa Clara	15.3	75.4	9.3	47.2	6.5	1.7	0.1	42.8	1.7
6037463900	18.03	33.25	30-35%	3456 Los Angeles	7.4	61.8	30.8	15.3	67.1	4.7	0.2	10.2	2.5
6037910603	18.02	33.23	30-35%	7075 Los Angeles	16.1	76.3	7.6	62.5	20.3	12.2	0.1	2.9	2
6037301300	18.02	33.22	30-35%	2016 Los Angeles	12.3	70.2	17.5	10.5	79.1	0.7	0.1	7.2	2.4
6067002400	18.02	33.21	30-35%	4387 Sacramento	11.8	70.5	17.7	11.7	75.6	1.4	0.1	7.5	3.7
6037554514	18.01	33.19	30-35%	4322 Los Angeles	9.7	75.6	14.7	14	16.5	10	0.1	56.3	3.1
6037216300	18.01	33.18	30-35%	4526 Los Angeles	9	74.7	16.3	9.3	61.4	10.5	0.2	14.7	3.9
6067008113	18.01	33.17	30-35%	3752 Sacramento	14.8	77	8.2	23.6	66.9	2	0.7	2.5	4.3
6089012702	18.01	33.16	30-35%	3083 Shasta	11.2	65.3	23.5	13.9	79.7	0.1	4	0.5	1.9
6065041913	18.00	33.14	30-35%	5478 Riverside	12	81.4	6.6	27.7	50.7	3.6	0.2	14.8	3
6067004006	18.00	33.13	30-35%	4843 Sacramento	11.9	70.6	17.5	19.2	35.6	17.2	0.6	21.8	5.5
6059099407	17.99	33.12	30-35%	2480 Orange	11.2	72.1	16.7	11.7	74.2	0.6	0.4	9.9	3.3
6037108101	17.99	33.11	30-35%	2230 Los Angeles	9	73.2	17.8	9.4	60.6	3.2	0.3	22.8	3.8
6111002102	17.98	33.09	30-35%	1832 Ventura	5.5	82.2	12.3	13.9	78.5	0.5	0.5	2.9	3.6
6059011708	17.98	33.08	30-35%	4317 Orange	9.1	83.5	7.4	27	49.5	3.6	0.2	16.8	2.9
6037139600	17.97	33.07	30-35%	4633 Los Angeles	8.7	68.9	22.4	8.5	77.6	3.7	0.2	6.5	3.6
6037271600	17.97	33.06	30-35%	4475 Los Angeles	14.7	74.5	10.8	10.1	48.8	2.1	0.2	34.8	4
6085503116	17.97	33.04	30-35%	5240 Santa Clara	14.5	73.2	12.3	24.1	33.6	3.3	0.2	35.1	3.6
6111003609	17.96	33.03	30-35%	5966 Ventura	7.1	68.2	24.7	12.1	78.8	1.8	0.3	4.2	2.8
6065044804	17.95	33.02	30-35%	2850 Riverside	11.4	75.4	13.2	49.5	30.1	1.6	0.4	16.8	1.6
6065044516	17.93	33.01	30-35%	6606 Riverside	19.5	70.7	9.8	60	29.3	6.5	0.5	1.8	1.9
6073021206	17.93	32.99	30-35%	2995 San Diego	9.8	74.3	15.9	14	80	0.7	1.5	1.9	1.9
6037401303	17.93	32.98	30-35%	2199 Los Angeles	8.9	78.4	12.7	23.8	47	4	0	22.1	3.1
6089011100	17.92	32.97	30-35%	3096 Shasta	13.4	70.5	16.1	5.8	86.2	0.7	2.2	1.6	3.4
6065041808	17.92	32.95	30-35%	6852 Riverside	14.3	75.9	9.8	27.6	45.2	7.5	0.2	16.2	3.3
6073006600	17.92	32.94	30-35%	1920 San Diego	40.1	59.2	0.7	28.2	29.5	22.7	0.5	9.5	9.6
6097150609	17.92	32.93	30-35%	4465 Sonoma	12.3	66.7	21	24.4	65.7	1	0.2	6	2.7
6073019502	17.91	32.92	30-35%	5715 San Diego	21.5	75.6	2.9	82.2	12.5	2.2	0.4	1.4	1.4
6037650701	17.91	32.90	30-35%	2521 Los Angeles	9.6	70.8	19.6	11.3	50.6	1.6	0	33	3.4
6017031600	17.90	32.89	30-35%	4126 El Dorado	13.3	79.7	7	49.2	34.1	0.8	0.4	13.5	2
6081601700	17.88	32.88	30-35%	4286 San Mateo	10.6	74.7	14.7	30.8	26.5	1.6	0.3	37.4	3.4
6037901011	17.88	32.87	30-35%	5069 Los Angeles	13.4	76.5	10.1	25.8	49.2	13.3	0.3	6.9	4.5
6073020019	17.87	32.85	30-35%	6832 San Diego	10.2	60.5	29.3	26.4	63.1	2.2	0.2	5.6	2.5
6067009502	17.86	32.84	30-35%	7055 Sacramento	14	76.5	9.5	38.5	54.3	1.7	0.9	2.2	2.4
6065041810	17.85	32.83	30-35%	5665 Riverside	13.4	79	7.6	27.8	50.1	6.4	0.1	12.1	3.6
6071002035	17.85	32.82	30-35%	6874 San Bernardino	13.4	80.1	6.5	31.3	40.5	9.1	0.1	15.5	3.4
6073016802	17.85	32.80	30-35%	6942 San Diego	7.9	69.7	22.4	12.4	82.4	0.9	0.6	1.7	2.1
6065044926	17.85	32.79	30-35%	4665 Riverside	13.3	77.7	9	69.8	17	1.4	0.4	10	1.4
6059063907	17.84	32.78	30-35%	6994 Orange	8.6	81.7	9.7	15.7	54.1	2.1	0.2	23.6	4.3
6071002018	17.83	32.77	30-35%	5342 San Bernardino	12	81.1	6.9	28.6	52.1	7.8	0.2	7.5	3.8
6111003801	17.83	32.75	30-35%	5778 Ventura	19.5	74.1	6.4	94.4	2.8	1.5	0.2	0.4	0.7
6071008402	17.82	32.74	30-35%	6448 San Bernardino	11	77.7	11.3	25.2	62.2	4.6	0.3	5	2.7
6073009304	17.82	32.73	30-35%	7944 San Diego	5.7	89.9	4.4	17.3	59.1	5.5	0.4	13.2	4.6
6073018614	17.82	32.72	30-35%	6494 San Diego	13.6	69.8	16.6	43.6	39.3	4.6	0.6	8	3.9
6073016401	17.82	32.70	30-35%	4996 San Diego	11.4	69.8	18.8	19.2	70.5	3.3	0.3	3.2	3.5
6109003100	17.81	32.69	30-35%	6433 Tuolumne	8	68.8	23.2	7.1	88.1	0.2	1.4	0.9	2.3
6087100300	17.80	32.68	30-35%	3380 Santa Cruz	7.1	77.3	15.6	11.1	76.7	1.6	0.6	6.3	3.7
6065041806	17.80	32.66	30-35%	4255 Riverside	14.1	80.3	5.6	30.8	47	6.7	0.4	11.9	3.1
6085512053	17.80	32.65	30-35%	4534 Santa Clara	14.3	76.4	9.3	34.1	42.9	3.7	0.6	14.3	4.4
6075026200	17.79	32.64	30-35%	7564 San Francisco	10.1	76.4	13.5	28	8.8	2.3	0.1	58.8	2
6037408626	17.79	32.63	30-35%	4341 Los Angeles	9.2	76.7	14.1	24.2	7	1.6	0	65.4	1.7
6073020404	17.77	32.61	30-35%	5070 San Diego	12.7	75.5	11.8	25.3	58.4	2.7	0.3	10.3	3
6073019302	17.76	32.60	30-35%	7344 San Diego	11.3	74.3	14.4	27.1	57.7	4.3	0.4	6.9	3.6
6001443301	17.76	32.59	30-35%	4074 Alameda	15.6	74.9	9.5	6.8	29.7	1.4	0	58.7	3.4
6097151000	17.76	32.58	30-35%	3483 Sonoma	9.1	74.8	16.1	14.8	79.5	0.3	0.5	2.2	2.6
6085512039	17.76	32.56	30-35%	4784 Santa Clara	15.1	78.5	6.4	32.1	20.5	4.1	0.3	39.4	3.6
6029000909	17.75	32.55	30-35%	2406 Kern	9.5	69.7	20.8	27	64.7	1.7	0.5	3.9	2.2
6065042217	17.74	32.54	30-35%	5461 Riverside	10.1	78.8	11.1	21.9	57.5	8.1	0.2	8.6	3.7
6085503803	17.73	32.53	30-35%	4477 Santa Clara	14	76.4	9.6	19.1	12.2	2.4	0.1	63.3	2.9
6065045222	17.73	32.51	30-35%	1595 Riverside	12.8	57.9	29.3	28.9	62.1	1.7	0.4	5.1	1.8
6059001708	17.73	32.50	30-35%	3786 Orange	8.2	70.8	21	19.8	38.5	1.5	0.1	37.8	2.4
6081601000	17.73	32.49	30-35%	6913 San Mateo	10.1	77.2	12.7	16.9	18.1	4.9	0.1	55.6	4.4
6019005515	17.72	32.48	30-35%	1653 Fresno	9.7	74	16.3	14.4	72.1	1.1	0.7	8.4	3.3
6067001500	17.71	32.46	30-35%	4329 Sacramento	8	76.1	15.9	11.2	78.8	1.8	0.3	4.7	3.2
6073014804	17.70	32.45	30-35%	4351 San Diego	8.9	68.4	22.7	13.7	73.5	4.7	0.6	4.2	3.4
6001432100	17.70	32.44	30-35%	3770 Alameda	13.4	75.4	11.2	22.8	45.5	13.9	0.4	12.5	5
6037574201	17.69	32.43	30-35%	3117 Los Angeles	11.8	74.2	14	22.3	57.6	3	0.2	12.4	4.5
6085513500	17.69	32.41	30-35%	1144 Santa Clara	11.2	75.3	13.5	30.1	59.7	0.9	0.6	5.2	3.5
6065045212	17.69	32.40	30-35%	2293 Riverside	6.9	44	49.1	22.9	67.4	6.9	0.1	1.7	1
6065050700	17.69	32.39	30-35%	9969 Riverside	19.7	75.1	5.2	30.2	47.5	8.1	0.5	10	3.8
6029003804	17.68	32.37	30-35%	15464 Kern	20.4	75.5	4.1	28.9	59	2.6	0.5	6.6	2.3
6023000200	17.68	32.36	30-35%	6211 Humboldt	13.3	77.4	9.3	13.2	70.3	1.7	3.7	5.8	5.3
6073020710	17.68	32.35	30-35%	1749 San Diego	7.7	70.1	22.2	14.4	74.3	1	0.7	7.8	1.8
6007001500	17.67	32.34	30-35%	5297 Butte	10.8	75.4	13.8	12.2	83.4	0.3	0.9	0.8	2.4
6071008709	17.67	32.32	30-35%	4162 San Bernardino	13.9	69.8	16.3	29.6	65.6	0.8	0.7	1.4	1.9
6065044522	17.66	32.31	30-35%	4876 Riverside	13.5	62.8	23.7	48.9	45.7	2.7	0.4	1.4	1
6085512042	17.66	32.30	30-35%	2841 Santa Clara	14.4	76.3	9.3	41.6	12.6	5	0.2	38.1	2.5
6001404900	17.66	32.29	30-35%	4129 Alameda	11.3	75.3	13.4	9.7	54	11.2	0	20	5.2
6081601901	17.65	32.27	30-35%	4119 San Mateo	11.5	76.6	11.9	31.4	23.9	2.7	0.2	36.8	4.9
6085505302	17.65	32.26	30-35%	4015 Santa Clara	12.8	73	14.2	24.7	42.2	2.2	0.1	27.8	2.9
6037620601	17.65	32.25	30-35%	5523 Los Angeles	12.2	79.5	8.3	21.7	53.6	4.5	0.3	15	4.8
6059052421	17.65	32.24	30-35%	5111 Orange	9.1	81	9.9	8.7	57.7	1.3	0.1	28.6	3.7
6041104200	17.65	32.22	30-35%	5722 Marin	11.7	67.9	20.4	22.4	67.4	1.9	0.1	4.6	3.6
6111008500	17.65	32.21	30-35%	8420 Ventura	11.1	78.1	10.8	16	69.4	1.2	0.2	9.8	3.4
6067008137	17.64	32.20	30-35%	2432 Sacramento	13.5	70.3	16.2	11.4	79.9	2.8	0.2	2.8	3
6067007429	17.64	32.19	30-35%	4889 Sacramento	19.4	75.7	4.9	24.3	49.4	10.9	0.8	8.2	6.3
6037143500	17.64	32.17	30-35%	4708 Los Angeles	10.7	77.4	11.9	8.1	79.1	3.5	0.2	6	3.1
6067009325	17.64	32.16	30-35%	836 Sacramento	7.1	76.4	16.5	17.6	68.8	2.3	0.2	9.2	1.9
6037214000	17.64	32.15	30-35%	3898 Los Angeles	18.2	69.6	12.2	3	91.3	0.7	0.1	3.4	1.4
6085503903	17.63	32.14	30-35%	3301 Santa Clara	13.9	74	12.1	49.9	12.4	1.3	0.3	34.3	1.9
6067009617	17.63	32.12	30-35%	3545 Sacramento	9.8	78.2	12	12.7	57.2	10	0.3	15.2	4.7
6053013700	17.63	32.11	30-35%	5131 Monterey	19.3	75.4	5.3	74.2	11.7	4	0.2	7.5	2.3
6065043809	17.63	32.10	30-35%	3015 Riverside	5.8	52.8	41.4	15	80.5	1.2	0.6	1.5	1.2
6037215102	17.63	32.08	30-35%	3110 Los Angeles	4.4	91.8	3.8	11.4	63.5	6.7	0.2	14.5	3.7
6037431800	17.63	32.07	30-35%	5640 Los Angeles	9.3	70.4	20.3	14.4	25.9	1.1	0.1	56.8	1.7
6037651101	17.62	32.06	30-35%	5103 Los Angeles	12	67	21	11.2	42.3	3.3	0.1	39.7	3.4
6067009106	17.62	32.05	30-35%	4143 Sacramento	9.9	77.8	12.3	15	65.8	7.7	0.3	6.6	4.5
6057000801	17.62	32.03	30-35%	4888 Nevada	6.9	74.3	18.8	5	90.1	0.6	0.9	1	2.4
6037910714	17.61	32.02	30-35%	3596 Los Angeles	17.9	76.2	5.9	69.7	13.3	13.7	0.4	1.7	1.3
6001441800	17.60	32.01	30-35%	6786 Alameda	14.8	74.8	10.4	15.8	33.9	3.6	0.2	42.1	4.4
6033000100	17.60	32.00	30-35%	3121 Lake	12.2	71.7	16.1	15.3	73.8	1	6.3	0.7	2.9
6067008132	17.60	31.98	30-35%	3710 Sacramento	10.1	67.2	22.7	10.5	76.5	2.5	0.4	7	3.1
6013357000	17.60	31.97	30-35%	3018 Contra Costa	7	77.4	15.6	15	72.1	4.2	0.5	4.1	4
6111007606	17.60	31.96	30-35%	1555 Ventura	13.6	78.8	7.6	29.3	52.8	1.6	0.1	13.6	2.6
6071002025	17.59	31.95	30-35%	5056 San Bernardino	10.4	73.4	16.2	31	57.1	5.1	0.3	3.7	2.7
6037910605	17.59	31.93	30-35%	4535 Los Angeles	16.7	77.4	5.9	64.4	19.5	11.8	0.4	1.9	1.9
6075025200	17.58	31.92	30-35%	5369 San Francisco	9.9	80.1	10	27.6	53.8	3.8	0.4	10.2	4.2
6073008503	17.57	31.91	30-35%	6599 San Diego	10.4	74.1	15.5	21.5	67.7	1.4	0.4	5.7	3.3
6059021812	17.57	31.90	30-35%	6339 Orange	11.8	78.2	10	26.7	56.3	2.3	0.3	11.6	2.7
6071007104	17.56	31.88	30-35%	4093 San Bernardino	10.6	75.5	13.9	33.7	50.8	3.7	0.4	8.7	2.7
6097150305	17.56	31.87	30-35%	5282 Sonoma	18.1	75	6.9	60.3	36.3	0.4	0.3	1.1	1.6
6059110118	17.56	31.86	30-35%	2668 Orange	8.7	82	9.3	8.8	30.6	2.8	0.1	54.8	3
6037143700	17.56	31.85	30-35%	3748 Los Angeles	7.9	78.5	13.6	7.1	78.1	4.2	0.1	7.1	3.5
6067008006	17.56	31.83	30-35%	5718 Sacramento	8.7	71.7	19.6	8.2	81.3	2	0.3	4.8	3.3
6071002019	17.55	31.82	30-35%	4757 San Bernardino	11.5	82.8	5.7	30.4	42.2	12	0.2	11.5	3.7
6111008004	17.55	31.81	30-35%	5156 Ventura	12.1	78.7	9.2	34.5	54.9	1.1	0.3	5.8	3.3
6083001800	17.54	31.79	30-35%	1245 Santa Barbara	12.8	73.5	13.7	44.6	52.6	0.6	0.4	0.6	1.1
6089011702	17.54	31.78	30-35%	3476 Shasta	12.9	76	11.1	8.6	78.8	0.3	3.8	4.4	4.1

6077005210	17.53	31.77	30-35%	11433 San Joaquin	17.1	77.8	5.1	28.8	38	7.3	0.3	20.2	5.3
6089010200	17.53	31.76	30-35%	2078 Shasta	10.3	66.7	23	7.1	85.2	1.3	1.6	1.9	2.9
6013339001	17.52	31.74	30-35%	3362 Contra Costa	8.8	84.7	6.5	17	56.7	4.6	0	17.2	4.5
6065040816	17.50	31.73	30-35%	2594 Riverside	12.4	81.7	5.9	27.4	39.4	12.5	0.3	17.8	2.6
6085504316	17.50	31.72	30-35%	4839 Santa Clara	13.6	77	9.4	17	9.7	2.4	0.3	68.3	2.3
6089011500	17.50	31.71	30-35%	5485 Shasta	9.7	67.7	22.6	7.2	85.1	0.2	2.9	1.8	2.8
6013337200	17.49	31.69	30-35%	7183 Contra Costa	11	74	15	21.5	57.2	4.2	0.3	12	4.7
6013333200	17.49	31.68	30-35%	5926 Contra Costa	10.8	73.1	16.1	19.7	63.6	2.4	0.2	10.4	3.7
6073000400	17.49	31.67	30-35%	3669 San Diego	3.6	86.9	9.5	15.6	66.6	4.1	0.4	9.9	3.4
6097151204	17.49	31.66	30-35%	3413 Sonoma	11.5	78.4	10.1	18.6	70.8	1.6	0.7	4.3	4.1
6071007901	17.48	31.64	30-35%	7908 San Bernardino	12.9	77.9	9.2	26.3	51.3	6.7	0.3	11.6	3.9
6059110202	17.47	31.63	30-35%	7762 Orange	13.6	77.8	8.6	37	27.2	4.5	0.2	28.1	3
6037574400	17.47	31.62	30-35%	5141 Los Angeles	11.3	72.9	15.8	15.5	69.1	2.8	0.4	8.7	3.5
6037194401	17.46	31.61	30-35%	2461 Los Angeles	4.5	77.8	17.7	10.1	77.4	2.9	0.1	6.5	3
6111001201	17.46	31.59	30-35%	4235 Ventura	12.8	68.3	18.9	34.6	57.6	1.8	0.5	3.1	2.4
6071010901	17.45	31.58	30-35%	5321 San Bernardino	11.1	74	14.9	16.9	77.9	0.6	0.4	1.3	2.9
6037111204	17.45	31.57	30-35%	5859 Los Angeles	8.5	72.7	18.8	14.9	58.8	3.8	0.1	19.7	2.7
6059063102	17.45	31.56	30-35%	6257 Orange	10.6	79.7	9.7	14	77.5	0.6	0.2	4.4	3.3
6067008134	17.44	31.54	30-35%	4647 Sacramento	12.9	74.7	12.4	15.5	69	5.3	0.8	4	5.5
6033000300	17.44	31.53	30-35%	3846 Lake	8.8	69.3	21.9	16	76.7	1.4	2.1	1.2	2.7
6001427100	17.43	31.52	30-35%	3646 Alameda	13.5	69.4	17.1	9.3	67.4	2.1	0.3	14.7	6.2
6053010102	17.43	31.50	30-35%	3279 Monterey	11.8	76.8	11.4	44.5	49.6	0.3	0.3	3.1	2.2
6067008139	17.43	31.49	30-35%	3360 Sacramento	11.7	76	12.3	22.1	63.2	3.4	1	5.1	5.3
6111000702	17.42	31.48	30-35%	3065 Ventura	15.1	74.3	10.6	78.6	19.7	0.2	0.4	0.6	0.6
6053013900	17.41	31.47	30-35%	2673 Monterey	13.7	73.7	12.6	39.6	38	5.2	0.5	11.7	5
6075025402	17.41	31.45	30-35%	2912 San Francisco	10.9	75.9	13.2	28.3	38	5.7	0.4	23.4	4.2
6045010600	17.41	31.44	30-35%	6917 Mendocino	10.5	74.8	14.7	10.6	83.1	0.3	2	0.8	3.2
6075022702	17.40	31.43	30-35%	2060 San Francisco	8.7	80.7	10.6	12.3	69.6	2.1	0	11.2	4.7
6067004012	17.40	31.42	30-35%	3267 Sacramento	10	79.2	10.8	13.8	37.8	11.2	0.3	32.1	4.8
6067007017	17.40	31.40	30-35%	2770 Sacramento	16.4	79	4.6	23.2	42.9	9.9	0.4	18.7	5
6059110113	17.39	31.39	30-35%	2276 Orange	10.1	72.7	17.2	22	44	1.1	0.1	29	3.6
6059110012	17.38	31.38	30-35%	5012 Orange	10.3	64.3	25.4	10.9	70.9	1.1	0.2	13.9	3.1
6037276400	17.38	31.37	30-35%	4009 Los Angeles	12	71.3	16.7	11.6	70.8	2.6	0.1	11	4
6073003207	17.38	31.35	30-35%	5890 San Diego	11.2	73.3	15.5	44.6	35.4	5.1	0.4	11.2	3.3
6053010604	17.38	31.34	30-35%	5512 Monterey	18.2	74.9	6.9	79.5	7.5	1.8	0.5	9.3	1.3
6085509105	17.37	31.33	30-35%	6396 Santa Clara	11.4	77.3	11.3	14	43.5	2.6	0.1	35.7	4.1
6059099412	17.36	31.32	30-35%	4630 Orange	11	74.9	14.1	13.9	70.2	1.7	0.3	9.8	4.1
6037215101	17.36	31.30	30-35%	2477 Los Angeles	4.8	90.2	5	14.1	54.5	10	0.2	17.4	3.8
6059099405	17.36	31.29	30-35%	4468 Orange	11.8	76.8	11.4	16.9	67.6	2.1	0.1	8.9	4.4
6083002006	17.35	31.28	30-35%	2240 Santa Barbara	9.1	71.1	19.8	24.7	68.9	0.4	0.8	3	2.1
6059011718	17.35	31.26	30-35%	3263 Orange	10.8	74.3	14.9	20.3	66.8	1.4	0.2	9.5	1.9
6037577603	17.34	31.25	30-35%	8255 Los Angeles	9.6	74	16.4	11.9	74.5	2.4	0.2	7.2	3.8
6065043274	17.34	31.24	30-35%	2545 Riverside	19.1	74.8	6.1	39	47.7	2.3	0.4	7.9	2.7
6087101000	17.34	31.23	30-35%	7866 Santa Cruz	8.2	84.5	7.3	30.9	55.9	1.8	0.5	7	3.9
6037702102	17.33	31.21	30-35%	6306 Los Angeles	5.8	80	14.2	10.3	77.7	2.1	0.3	5.8	3.8
6097152905	17.33	31.20	30-35%	4037 Sonoma	12.5	76	11.5	27	59.7	3	1.4	6.4	2.4
6081606600	17.32	31.19	30-35%	3703 San Mateo	14.1	74.4	11.5	21.2	55.8	1.2	0.1	17.6	4.1
6071000104	17.31	31.18	30-35%	6117 San Bernardino	10.1	81.8	8.1	25.7	25.1	5.8	0.1	40.3	3
6037910709	17.31	31.16	30-35%	1650 Los Angeles	11.6	75.8	12.6	38.8	50.5	5.1	0.3	2.1	3.2
6065043240	17.31	31.15	30-35%	8802 Riverside	19.6	75.1	5.3	26.4	50.3	7.1	0.6	11.6	4
6031000602	17.30	31.14	30-35%	5676 Kings	13.6	73.9	12.5	26.6	62	3.4	0.5	4.5	3
6087123100	17.30	31.13	30-35%	2638 Santa Cruz	14.9	73.4	11.7	57.2	38.4	0.1	0.6	2.4	1.3
6085504321	17.30	31.11	30-35%	5346 Santa Clara	13.9	75.9	10.2	20	10.8	2	0.1	65.1	2
6111003700	17.30	31.10	30-35%	6679 Ventura	17.7	74.6	7.7	90.2	4.3	3.2	0.3	1.2	0.9
6081610602	17.30	31.09	30-35%	3386 San Mateo	13.7	76.7	9.6	44.1	44.7	1	0.2	7.1	2.9
6073020020	17.29	31.08	30-35%	7477 San Diego	17.1	76.3	6.6	25.1	48.1	2.4	0.3	20	4.2
6061021034	17.29	31.06	30-35%	3901 Placer	16.6	79.1	4.3	11.9	69.7	1.8	0.2	12.4	4
6059110115	17.29	31.05	30-35%	3613 Orange	11.3	70.1	18.6	15.1	27.8	6.7	0.4	46.9	3.1
6037574800	17.28	31.04	30-35%	3000 Los Angeles	7.5	75.8	16.7	12.2	67.7	3.8	0.2	12.1	3.9
6019005904	17.27	31.03	30-35%	4192 Fresno	14.4	73	12.6	26.7	49.6	1.3	0.4	20	2
6037701402	17.27	31.01	30-35%	6696 Los Angeles	4.4	73.9	21.7	8.3	77.8	2.3	0.1	8	3.4
6001450745	17.27	31.00	30-35%	5956 Alameda	15.6	77	7.4	7.1	44.4	1.6	0	42.9	3.9
6085505403	17.26	30.99	30-35%	6595 Santa Clara	13.8	78.7	7.5	18.9	35.1	3.1	0.3	38.6	4
6073020025	17.26	30.97	30-35%	4626 San Diego	11.9	76.5	11.6	31.2	55.8	2.8	0.6	6.3	3.3
6073003113	17.26	30.96	30-35%	5043 San Diego	10.3	76.8	12.9	20.4	5.7	17	0.1	53.6	3.3
6085509403	17.25	30.95	30-35%	5121 Santa Clara	15	81.2	3.8	49.9	24.3	2.4	0.2	21.1	2
6085502301	17.24	30.94	30-35%	3245 Santa Clara	12.9	73.5	13.6	21.5	66.3	2.1	0.3	6.5	3.2
6085507806	17.24	30.92	30-35%	5889 Santa Clara	18.3	74.5	7.2	2.8	17.8	0.4	0.2	76.1	2.7
6081603700	17.24	30.91	30-35%	5430 San Mateo	9.6	72.9	17.5	19.9	35	2.1	0.1	38.3	4.5
6001451503	17.24	30.90	30-35%	5660 Alameda	13.1	74.9	12	21.7	65	1.9	0.4	7.4	3.7
6073016806	17.23	30.89	30-35%	4081 San Diego	14.3	74.3	11.4	22.2	68	2.8	0.8	2.4	3.9
6061020712	17.22	30.87	30-35%	3560 Placer	11.1	67.5	21.4	24.6	69.7	1.2	0.4	1.9	2.3
6013359105	17.21	30.86	30-35%	4542 Contra Costa	14.5	78.3	7.2	12.3	19	16.2	0.3	47.5	4.8
6001450752	17.21	30.85	30-35%	5262 Alameda	22.2	72.4	5.4	7.2	33.5	3.6	0.2	50.3	5.2
6085509303	17.20	30.84	30-35%	3706 Santa Clara	10.4	70.8	18.8	24.4	42.7	2.7	0.1	26.1	4
6073001100	17.20	30.82	30-35%	3098 San Diego	7.6	85.2	7.2	26.7	55.9	8.3	0.5	4.7	4
6073016616	17.19	30.81	30-35%	4067 San Diego	14.3	73.7	12	17.7	70.6	2.4	0.5	5.2	3.6
6029003809	17.19	30.80	30-35%	10984 Kern	14.5	78.4	7.1	21.5	67.6	2.2	0.8	5.3	2.7
6067009309	17.19	30.79	30-35%	2282 Sacramento	9.5	69.2	21.3	13.3	74.7	1.8	1.1	5.3	3.9
6081605900	17.19	30.77	30-35%	5579 San Mateo	12.1	73.8	14.1	31.7	45.2	2.4	0.1	16.2	4.4
6015000102	17.18	30.76	30-35%	3769 Del Norte	13.7	70.7	15.6	11.8	71.9	0.2	8.9	3.2	4.1
6075016300	17.18	30.75	30-35%	4293 San Francisco	6.2	85.9	7.9	12.8	50.3	18.7	0.4	13.4	4.4
6037620521	17.18	30.74	30-35%	4097 Los Angeles	13.6	79.7	6.7	23.1	53.6	5.4	0.1	12.2	5.5
6001450300	17.18	30.72	30-35%	4551 Alameda	14.4	76.3	9.3	15	58.6	3.5	0.3	17.4	5.2
6001438000	17.15	30.71	30-35%	3283 Alameda	13.2	75.7	11.1	32.7	32.7	8	0.2	21.6	4.7
6085512313	17.15	30.70	30-35%	3887 Santa Clara	18.1	75	6.9	55.3	34.2	2.2	0.2	5.4	2.7
6059110116	17.14	30.68	30-35%	4761 Orange	11.2	73	15.8	14.9	23.7	4.1	0	54.1	3.2
6001451300	17.14	30.67	30-35%	6560 Alameda	13.1	78.9	8	21	67.1	1.8	0.3	6.2	3.6
6001403900	17.13	30.66	30-35%	3584 Alameda	6.6	82.4	11	9	55.4	16	0.4	13.7	5.6
6037650800	17.12	30.65	30-35%	7074 Los Angeles	12.7	73.4	13.9	5.8	24.5	1.8	0.1	64.7	3.2
6037910606	17.12	30.63	30-35%	2970 Los Angeles	17	77.9	5.1	64.6	19.6	12.3	0.6	1.5	1.4
6029005404	17.12	30.62	30-35%	6672 Kern	14.8	74.2	11	17	70.6	3.6	0.6	3.9	4.3
6075010500	17.10	30.61	30-35%	2685 San Francisco	4.2	70	25.8	5.8	61.6	1.7	0.1	29	1.8
6001427800	17.09	30.60	30-35%	4640 Alameda	11.5	76.9	11.6	11.8	51.9	4.4	0.3	25.2	6.4
6057000900	17.09	30.58	30-35%	4348 Nevada	8.6	77.8	13.6	5.4	87.4	0.6	1.2	1.2	4.3
6037480704	17.09	30.57	30-35%	4531 Los Angeles	10	80.2	9.8	20.6	36.2	2.2	0.2	37.1	3.8
6097151100	17.08	30.56	30-35%	5151 Sonoma	11.5	76.4	12.1	14.5	79.8	1.2	0.4	1.3	2.8
6111003605	17.07	30.55	30-35%	8606 Ventura	13.8	77.4	8.8	49.3	33.5	4	0.2	9.8	3.2
6033000600	17.06	30.53	30-35%	3957 Lake	7	64.9	28.1	9.1	82.1	2	2.1	1.5	3.3
6001404800	17.06	30.52	30-35%	2684 Alameda	12.5	74.6	12.9	11.5	45.5	19.7	0.6	17.2	5.5
6037599000	17.05	30.51	30-35%	3569 Los Angeles	12.6	76.1	11.3	55.8	41.2	0.3	0.2	1.4	1.1
6065043256	17.04	30.50	30-35%	3478 Riverside	15.9	80.2	3.9	30.6	46.7	6.7	0.7	10.2	5
6073003114	17.03	30.48	30-35%	3341 San Diego	11.7	79.4	8.9	14.8	3.9	17.7	0	60.1	3.6
6037403703	17.03	30.47	30-35%	4748 Los Angeles	9.9	73.5	16.6	35.3	46.7	2.8	0.2	12.9	2.2
6037920330	17.03	30.46	30-35%	5349 Los Angeles	9.4	74.5	16.1	13.7	70.5	1.9	0.1	11.1	2.7
6089010900	17.03	30.45	30-35%	4293 Shasta	14	66.7	19.3	11.3	75.1	1.4	2.3	5.2	4.8
6035040200	17.02	30.43	30-35%	2534 Lassen	10.1	73.5	16.4	9.4	84	0.1	4	0.7	1.8
6061020714	17.02	30.42	30-35%	3660 Placer	9.1	75.7	15.2	9.9	81.2	1.5	0.6	4.5	2.3
6037271100	17.02	30.41	30-35%	2449 Los Angeles	12.4	74.4	13.2	19.1	53.7	2.5	0	19.4	5.2
6071009709	17.02	30.39	30-35%	6356 San Bernardino	17.1	72.8	10.1	37.7	50.6	6.3	0.5	2	3
6059110304	17.01	30.38	30-35%	4612 Orange	9.2	77.5	13.3	21.5	37.7	2.6	0.2	35.2	2.7
6037460301	17.01	30.37	30-35%	4638 Los Angeles	11.2	76.3	12.5	19.6	34.4	34.8	0.2	4.9	6.1
6073016606	17.00	30.36	30-35%	3388 San Diego	11.7	78.9	9.4	16.4	72.7	0.6	0.4	5.7	4.2
6081608600	17.00	30.34	30-35%	4359 San Mateo	13.8	77.9	8.3	17.5	45.5	2.8	0.1	28.6	5.5
6037310100	16.99	30.33	30-35%	5849 Los Angeles	10.3	71	18.7	10.7	72.5	0.9	0.1	12.9	2.8
6067009108	16.99	30.32	30-35%	3693 Sacramento	11.7	71.8	16.5	18.4	58.8	5.1	0.8	11.8	5
6013338101	16.98	30.31	30-35%	4996 Contra Costa	14.2	75.9	9.9	42.1	35.9	4.9	0.2	12	4.8
6037901009	16.97	30.29	30-35%	5318 Los Angeles	12.7	73.9	13.4	26.6	50.4	15	0.3	4.3	3.4
6037211701	16.96	30.28	30-35%	2827 Los Angeles	11.8	74.8	13.4	10.3	29.4	4.4	0	54.4	1.6
6111008303	16.96	30.27	30-35%	3767 Ventura	12.8	72.1	15.1	23.7	59.3	1.4	0.2	11.9	3.5
6001428200	16.95	30.26	30-35%	6259 Alameda	12.4	72.8	14.8	9.9	54.1	3.6	0.2	26.2	6
6037124700	16.95	30.24	30-35%	4796 Los Angeles	10.2	76.1	13.7	12.7	73.3	4.9	0.1	6	2.9
6111005303	16.94	30.23	30-35%	9416 Ventura	14.8	75.8	9.4	19	60.1	1.6	0.2	15.3	3.9

6111001506	16.94	30.22	30-35%	5027 Ventura	12.5	75.1	12.4	31.4	60.6	1.1	0.5	3.3	3.1
6061021045	16.94	30.21	30-35%	2962 Placer	14.5	77.5	8	21.9	68.3	1.1	0.6	4.2	3.8
6013304003	16.94	30.19	30-35%	3433 Contra Costa	9.2	72.1	18.7	12.1	80.3	1.8	0.5	2.5	2.8
6001432800	16.92	30.18	30-35%	3729 Alameda	9.8	70.6	19.6	20.5	41.5	11.6	0.1	22.4	4
6097153401	16.92	30.17	30-35%	6131 Sonoma	10.3	75.4	14.3	12.4	82.4	1	0.5	1.5	2.3
6075011000	16.92	30.16	30-35%	4827 San Francisco	3.6	82.5	13.9	4.7	44.3	1.6	0.1	46.6	2.8
6065045108	16.91	30.14	30-35%	5726 Riverside	13	64.8	22.2	46.6	46.3	2	0.4	2.9	1.8
6037901101	16.90	30.13	30-35%	5496 Los Angeles	14.6	77.1	8.3	29.3	54	9.7	0.5	3.6	3
6001435102	16.90	30.12	30-35%	5179 Alameda	7.7	83.1	9.2	15.3	36.3	17	0.1	25.2	6.1
6073003105	16.89	30.10	30-35%	4167 San Diego	14.4	75.8	9.8	64.3	13.1	11.3	0.4	8.4	2.7
6037901209	16.89	30.09	30-35%	1633 Los Angeles	9.1	75.7	15.2	22.4	69.5	3.1	0.7	1.8	2.6
6037910715	16.89	30.08	30-35%	6702 Los Angeles	17.6	76.5	5.9	62.9	17.2	14.1	0.1	3.3	2.4
6071010902	16.88	30.07	30-35%	3714 San Bernardino	11	74.4	14.6	21.5	73.8	0.6	0.3	1.3	2.5
6017031504	16.88	30.05	30-35%	5337 El Dorado	10.7	68.7	20.6	10.7	83.8	0.4	1.2	1	2.8
6001441200	16.88	30.04	30-35%	6816 Alameda	14.1	76	9.9	16.7	43	2.4	0.3	32.3	5.3
6097150602	16.87	30.03	30-35%	4307 Sonoma	10.7	74.7	14.6	19.6	72.1	1.5	0.3	4.1	2.5
6071002017	16.86	30.02	30-35%	5826 San Bernardino	9.1	80.4	10.5	22.4	61.6	3.8	0.2	9.3	2.7
6065045216	16.85	30.00	30-35%	1804 Riverside	5	50.1	44.9	15.6	78	2.8	0.2	2.4	0.9
6095253403	16.85	29.99	25-30%	4959 Solano	13.6	77.5	8.9	31.7	57.7	2.2	0.5	4.6	3.2
6015000203	16.84	29.98	25-30%	1373 Del Norte	12.3	71.6	16.1	11.4	52	0.9	28.7	0.2	6.8
6073013801	16.84	29.97	25-30%	4771 San Diego	14.3	73.4	12.3	31.9	48.8	9.5	0.3	5.1	4.4
6035040303	16.84	29.95	25-30%	3616 Lassen	13	73.9	13.1	15.4	72.5	2.4	2.9	2.9	3.8
6037113235	16.83	29.94	25-30%	1602 Los Angeles	9.2	79	11.8	13.3	74.8	3	0.6	3.9	4.4
6063000100	16.82	29.93	25-30%	5500 Plumas	9.7	73.1	17.2	6.2	84.8	2.5	1.6	0.8	4.1
6067009609	16.81	29.92	25-30%	5215 Sacramento	16.3	77.9	5.8	25.8	12.5	22.6	0.2	32.2	6.8
6053010607	16.81	29.90	25-30%	4430 Monterey	23.7	72.7	3.6	96.4	1.5	0.5	0.2	1.2	0.3
6059042203	16.81	29.89	25-30%	7015 Orange	9	67.2	23.8	12.2	80.3	0.6	0.2	3.8	2.9
6037481800	16.80	29.88	25-30%	2596 Los Angeles	9.6	67.7	22.7	25	14.3	0.2	0	59	1.4
6089010603	16.80	29.87	25-30%	1394 Shasta	9.5	70.3	20.2	2.7	89.8	0.3	2.7	0.9	3.7
6111007514	16.79	29.85	25-30%	6528 Ventura	11.8	72.4	15.8	16.5	68.5	2.1	0.4	9.5	3
6061021403	16.79	29.84	25-30%	7000 Placer	17.7	73	9.3	44.6	49.2	0.8	0.8	2.4	2.2
6061022600	16.78	29.83	25-30%	4840 Placer	15.8	77.5	6.7	13	69.9	2.6	0.5	9.6	4.5
6001450742	16.78	29.81	25-30%	4576 Alameda	12	73.5	14.5	10.4	65.5	1.3	0.2	19	3.7
6065030602	16.78	29.80	25-30%	3285 Riverside	7.7	70.5	21.8	16.4	73.3	3.8	0.6	3.8	2.1
6055200505	16.77	29.79	25-30%	2460 Napa	13	78.5	8.5	43.7	46.5	0.7	0.4	6.8	1.8
6073015403	16.77	29.78	25-30%	2508 San Diego	7.6	70.5	21.9	9	82.7	1.2	0.3	3.5	3.3
6085504901	16.76	29.76	25-30%	9530 Santa Clara	19.7	77	3.3	7.5	21.4	2.8	0.2	63.8	4.3
6067009328	16.76	29.75	25-30%	5245 Sacramento	18.8	75.3	5.9	17.8	33.8	11.9	0.4	30.4	5.7
6013369002	16.75	29.74	25-30%	2548 Contra Costa	12	77.8	10.2	28.1	32	18.3	0.3	15.4	5.9
6037463601	16.75	29.73	25-30%	5714 Los Angeles	7.3	81.5	11.2	14.6	50.2	4.9	0.1	26.2	4
6085504314	16.75	29.71	25-30%	4753 Santa Clara	12	76.7	11.3	15.3	14.8	2	0.2	64.4	3.4
6085503321	16.75	29.70	25-30%	4658 Santa Clara	11.1	78.3	10.6	12.9	4.9	1.4	0.3	79	1.6
6037400205	16.75	29.69	25-30%	3204 Los Angeles	9.1	76.9	14	14	56.1	5.9	0.3	20.7	2.9
6085506702	16.74	29.68	25-30%	5455 Santa Clara	12.7	78	9.3	18.2	55.9	4.4	0.4	17.2	3.9
6065045118	16.73	29.66	25-30%	2762 Riverside	13	61.4	25.6	44	50.3	1.6	0.1	3	1
6111005304	16.73	29.65	25-30%	5325 Ventura	6	45.3	48.7	11.1	77.5	1.3	0.1	8.2	1.7
6037620101	16.73	29.64	25-30%	5426 Los Angeles	10.7	79.5	9.8	16.2	69.4	2.1	0.2	8	4.1
6065041804	16.72	29.63	25-30%	3989 Riverside	14.2	78.5	7.3	30.6	53.6	3.6	0.1	9.6	2.4
6037310300	16.72	29.61	25-30%	2987 Los Angeles	10.4	70.1	19.5	10.8	69.6	0.7	0	15.5	3.4
6073008506	16.71	29.60	25-30%	4042 San Diego	11	75.8	13.2	24.3	54.4	1.8	0.2	14.9	4.5
6059021918	16.70	29.59	25-30%	5067 Orange	11.4	74.6	14	25.1	56.6	0.9	0.2	14.9	2.2
6085508508	16.70	29.57	25-30%	5322 Santa Clara	15.7	73.4	10.9	26.2	27.4	1.8	0.3	40.7	3.6
6067008119	16.68	29.56	25-30%	5668 Sacramento	12.6	74.7	12.7	14.6	75	2.9	0.9	2.5	4.2
6111007613	16.68	29.55	25-30%	3896 Ventura	16.4	76.3	7.3	25.1	58.9	1.4	0.2	10.4	4
6067008702	16.68	29.54	25-30%	3082 Sacramento	7.4	70.8	21.8	5.2	77	1.2	0.1	13.1	3.4
6075047902	16.68	29.52	25-30%	3536 San Francisco	7.9	75.7	16.4	6.7	43.6	1.2	0.1	44.1	4.4
6001441924	16.67	29.51	25-30%	7301 Alameda	17.7	74.6	7.7	13.7	22	3.1	0.4	55.9	4.9
6081613700	16.67	29.50	25-30%	8755 San Mateo	12.8	70.7	16.5	33.5	59.8	0.6	0.2	4.1	1.9
6081602500	16.66	29.49	25-30%	5092 San Mateo	9.9	72.8	17.3	9.4	16.9	4.5	0.1	65.5	3.6
6059052419	16.66	29.47	25-30%	3456 Orange	18.1	75.3	6.6	7.3	52.7	0.6	0.1	35.1	4.1
6037214100	16.66	29.46	25-30%	3944 Los Angeles	15.4	72.1	12.5	4.9	85.6	2.6	0	4.4	2.5
6067009323	16.65	29.45	25-30%	5321 Sacramento	11.6	79.8	8.6	15.8	46.6	10.4	0.5	20.7	6
6037701302	16.65	29.44	25-30%	4684 Los Angeles	6.8	80.6	12.6	7.1	81.3	1.5	0.2	6.9	3.1
6081600300	16.62	29.42	25-30%	4027 San Mateo	10.9	74.6	14.5	20.6	19.2	2.9	0.2	53.4	3.7
6023010700	16.62	29.41	25-30%	6940 Humboldt	9.9	73.1	17	7.4	81.4	0.9	3.1	3.1	4.1
6067007206	16.62	29.40	25-30%	4131 Sacramento	12.4	76.3	11.3	15.7	73.2	2.2	0.8	4.8	3.3
6063000502	16.62	29.39	25-30%	1811 Plumas	6.1	57.8	36.1	3.9	92.8	0.3	1.1	0.4	1.5
6073000600	16.62	29.37	25-30%	3108 San Diego	3.9	84	12.1	16.4	69.3	3.6	0.5	6.8	3.5
6097152701	16.61	29.36	25-30%	5271 Sonoma	11.2	72.3	16.5	20.5	72	0.6	1.2	2.9	2.8
6071010410	16.61	29.35	25-30%	3105 San Bernardino	13	73.9	13.1	15.3	79.7	1.3	0.6	1.2	1.9
6059063601	16.61	29.34	25-30%	3647 Orange	12.1	78.6	9.3	28.8	62.7	0.5	0.4	4	3.6
6075061500	16.59	29.32	25-30%	11502 San Francisco	4.3	90.5	5.2	6.5	54.7	3.7	0.3	30.9	4
6037430721	16.58	29.31	25-30%	3957 Los Angeles	9.3	72.5	18.2	23.6	26.6	1.5	0.2	46.5	1.6
6079011300	16.58	29.30	25-30%	7745 San Luis Obispo	8.4	78.8	12.8	17.9	69.6	1	0.4	7.6	3.4
6073014700	16.57	29.28	25-30%	7605 San Diego	12	76	12	20.3	62.4	5.8	0.5	6.6	4.4
6059110005	16.57	29.27	25-30%	3124 Orange	10	69.7	20.3	14	72.9	1	0.1	8.8	3.2
6089010300	16.57	29.26	25-30%	3833 Shasta	13.7	72.4	13.9	10.3	78.7	1.4	2.2	3.7	3.7
6059052425	16.56	29.25	25-30%	5865 Orange	12.7	81.7	5.6	22.3	57	2	0.2	14.9	3.7
6059042108	16.56	29.23	25-30%	5697 Orange	10.9	80.7	8.4	27.4	66.8	0.5	0.5	2.2	2.6
6037910805	16.54	29.22	25-30%	4839 Los Angeles	8.4	79	12.6	19.4	73.7	2.3	0.6	1.5	2.6
6073019701	16.54	29.21	25-30%	6022 San Diego	11.1	78.8	10.1	28.8	55.3	5.4	0.5	6.1	3.9
6075025401	16.54	29.20	25-30%	3404 San Francisco	11.1	79.4	9.5	37.5	40.7	4.1	0.2	13.2	4.2
6073002100	16.54	29.18	25-30%	5259 San Diego	11.9	83.2	4.9	36.7	39.3	11.7	0.4	8.5	3.6
6037194402	16.54	29.17	25-30%	3335 Los Angeles	3.3	86.5	10.2	8.8	79.6	2.2	0.1	6.4	2.9
6001440305	16.53	29.16	25-30%	3883 Alameda	11.6	73.8	14.6	16.2	15.5	7.8	0.1	54.8	5.6
6037463000	16.53	29.15	25-30%	2228 Los Angeles	10.4	71.4	18.2	17.5	52.1	5.3	0	21.9	3.2
6059052424	16.52	29.13	25-30%	5015 Orange	13	78.9	8.1	23.4	58	2	0.5	13.1	3
6071009715	16.52	29.12	25-30%	8260 San Bernardino	11.8	70.1	18.1	22.8	63.3	7	0.6	3.3	3
6013340001	16.52	29.11	25-30%	5857 Contra Costa	12.7	74.6	12.7	15.1	65.9	2.2	0.3	12.3	4.2
6013355108	16.52	29.10	25-30%	12847 Contra Costa	14.2	78.7	7.1	23.9	25.4	23.6	0.3	20.5	6.4
6113010701	16.51	29.08	25-30%	4625 Yolo	4.1	88.4	7.5	10.8	68.3	1.6	0.2	15.2	3.9
6073001400	16.51	29.07	25-30%	3084 San Diego	8.7	83.8	7.5	22.8	63.2	4.4	0.5	5.8	3.3
6059062621	16.51	29.06	25-30%	4800 Orange	10.9	72.5	16.6	19.4	62.7	1.5	0.3	12.4	3.7
6073009509	16.51	29.05	25-30%	4136 San Diego	6.9	83.8	9.3	14.4	63.6	6.2	0.3	10.9	4.6
6037403325	16.50	29.03	25-30%	4795 Los Angeles	10.1	79.2	10.7	17.6	24.3	3.1	0.3	51.6	3.1
6033001200	16.50	29.02	25-30%	3198 Lake	10.4	71.7	17.9	12.4	81.5	1.2	0.6	0.7	3.6
6073016701	16.49	29.01	25-30%	8666 San Diego	13.5	77.4	9.1	17.8	72	2.5	0.5	3.3	3.9
6029002808	16.48	28.99	25-30%	7257 Kern	10.8	76.6	12.6	23.6	57.4	5.6	0.6	10.2	2.7
6037297000	16.47	28.98	25-30%	5343 Los Angeles	11.7	73	15.3	28.7	60.9	2.8	0.3	3.9	3.4
6037910711	16.47	28.97	25-30%	7585 Los Angeles	16.2	75.5	8.3	60.7	20.6	13.8	0.3	2.5	2.1
6111006500	16.47	28.96	25-30%	3744 Ventura	13.4	79.2	7.4	47.4	46.7	0.9	0.2	3.1	1.6
6073015200	16.46	28.94	25-30%	3879 San Diego	9.1	68.8	22.1	11.6	81.1	2.2	0.3	2.6	2.3
6037910001	16.45	28.93	25-30%	5742 Los Angeles	15.8	76.8	7.4	67.3	21.1	9.2	0.3	0.7	1.4
6059052527	16.45	28.92	25-30%	8391 Orange	12	77.6	10.4	9.6	39	2	0.1	44.2	5.1
6001441100	16.44	28.91	25-30%	4308 Alameda	10.9	71.3	17.8	16.9	48.8	3.2	0.5	25.8	4.8
6085509102	16.44	28.89	25-30%	4798 Santa Clara	12.4	81.5	6.1	10.5	31.3	2.4	0.1	52	3.7
6067009307	16.43	28.88	25-30%	5241 Sacramento	12.1	76.6	11.3	16.1	59.8	5.7	0.8	12.8	4.8
6085504307	16.43	28.87	25-30%	5563 Santa Clara	13.2	74.2	12.6	15.3	15.1	2.5	0	63.9	3.2
6045010802	16.43	28.86	25-30%	1785 Mendocino	12.1	72.2	15.7	21.6	74.5	0.2	1.3	0.4	1.9
6059052521	16.42	28.84	25-30%	5391 Orange	10.5	83.2	6.3	13.6	37.5	3.7	0.1	37.8	7.3
6075015500	16.42	28.83	25-30%	3622 San Francisco	4	60.8	35.2	9.6	44.6	9.6	0.2	32.1	4
6073019902	16.42	28.82	25-30%	4078 San Diego	14.5	77.1	8.4	48.8	42.4	2.3	0.3	3.3	3
6101050603	16.42	28.81	25-30%	4528 Sutter	10.5	67.2	22.3	12.4	67	1.8	0.7	14.7	3.5
6037574500	16.42	28.79	25-30%	6357 Los Angeles	11.5	72.3	16.2	17	66.2	3.6	0.4	8.9	4
6001408200	16.42	28.78	25-30%	4054 Alameda	13.5	77.7	8.8	20.2	16.9	52.9	0.2	5.3	4.5
6065043823	16.39	28.77	25-30%	7023 Riverside	19.2	75.8	5	33.7	43.8	7.3	1	11	3.1
6037106643	16.39	28.76	25-30%	4320 Los Angeles	8.8	77.9	13.3	13.5	62.6	2.9	0.1	18.1	2.8
6073008901	16.38	28.74	25-30%	4805 San Diego	7.8	80.9	11.3	26.2	52.3	4.1	0.4	13.1	3.9
6037911001	16.38	28.73	25-30%	4201 Los Angeles	9.2	73.1	17.7	26.2	64.7	3.7	0.5	2.7	2.3
6081601603	16.37	28.72	25-30%	5800 San Mateo	8.9	75.4	15.7	11.4	13.1	2.5	0	69	3.9
6073013504	16.36	28.70	25-30%	3471 San Diego	13.9	74.7	11.4	22.7	48.8	11.9	0.2	12	4.4
6035040304	16.36	28.69	25-30%	1939 Lassen	13.8	71.6	14.6	13.4	75.5	0.8	2.3	3.2	4.8
6085502201	16.35	28.68	25-30%	6260 Santa Clara	14.3	77.1	8.6	34.6	34.6	7.7	0.3	19.6	3.2

6075040100	16.35	28.67	25-30%	4088 San Francisco	7.7	77.1	15.2	7.9	52.5	1.6	0.1	34.5	3.4
6073017015	16.35	28.65	25-30%	7295 San Diego	11.5	70.3	18.2	9.8	68.7	2.7	0.1	14.8	3.9
6037115101	16.35	28.64	25-30%	5046 Los Angeles	7.8	71.1	21.1	17.8	64.8	3.9	0.2	10.7	2.6
6075033203	16.34	28.63	25-30%	3472 San Francisco	6	82.1	11.9	14.2	45	6.3	0.3	28.5	5.7
6001450607	16.34	28.62	25-30%	5251 Alameda	12.9	71.8	15.3	19.6	55.2	1.9	0.2	19.2	3.8
6037271400	16.33	28.60	25-30%	3391 Los Angeles	12.8	67.5	19.7	13.2	69.7	0.9	0.1	11.9	4.3
6095252802	16.32	28.59	25-30%	1359 Solano	9.2	90.8	0	16.5	54	12.7	1	8.2	7.6
6073019001	16.31	28.58	25-30%	5946 San Diego	8.2	68.1	23.7	20.5	74.4	0.5	0.2	2.6	1.7
6009000121	16.31	28.57	25-30%	4463 Calaveras	10.6	67.2	22.2	12	82.9	0.3	1.1	1.4	2.3
6081602600	16.31	28.55	25-30%	8167 San Mateo	11.5	76.8	11.7	10.8	11.2	3.5	0.1	70.1	4.2
6059110109	16.31	28.54	25-30%	5045 Orange	10.1	77.5	12.4	16.9	39.5	2.4	0.5	37.4	3.2
6029003204	16.30	28.53	25-30%	9386 Kern	16.4	76.9	6.7	27.4	48.5	4.2	0.7	16.2	3.1
6073004400	16.29	28.52	25-30%	3866 San Diego	9.7	82.2	8.1	29.3	60.7	3	0.4	2.8	3.6
6085512029	16.29	28.50	25-30%	6892 Santa Clara	13.2	76.3	10.5	32.1	43.8	3.4	0.4	16.4	3.9
6037460401	16.29	28.49	25-30%	878 Los Angeles	12.6	71.1	16.3	28.4	15.3	40	0.3	10.7	5.4
6037293301	16.28	28.48	25-30%	2805 Los Angeles	9.3	70.6	20.1	20.6	28	7.5	0.1	40.4	3.4
6111001001	16.28	28.47	25-30%	2488 Ventura	9.8	75.2	15	19.9	75.4	0.4	1.1	1.2	1.9
6085511915	16.26	28.45	25-30%	3806 Santa Clara	18.2	70.5	11.3	50.4	32.2	2.3	0.3	11.2	3.6
6083003102	16.26	28.44	25-30%	3306 Santa Barbara	11.6	72.3	16.1	31	57.5	3.2	0.7	4	3.6
6065044402	16.25	28.43	25-30%	6218 Riverside	9	72.4	18.6	19.1	74.3	1.4	1.4	1.4	2.6
6073017049	16.25	28.41	25-30%	2919 San Diego	13.3	77.3	9.4	19.2	63.2	1.8	0.3	11.1	4.4
6059052511	16.24	28.40	25-30%	5672 Orange	10.3	73.4	16.3	6.8	62.9	1	0.1	24.8	4.5
6037265100	16.24	28.39	25-30%	2489 Los Angeles	8.9	55.7	35.4	4.7	86	1.2	0	4.5	3.7
6053013500	16.24	28.38	25-30%	4920 Monterey	12.1	73.4	14.5	32.2	34.9	13.6	0.4	12.8	6.1
6007001702	16.23	28.36	25-30%	5739 Butte	9.5	65.5	25	6.7	87.8	0.4	1	0.8	3.2
6073019208	16.22	28.35	25-30%	3305 San Diego	10.1	74.7	15.2	21.7	71.3	1.1	0.3	3.2	2.5
6023000500	16.22	28.34	25-30%	4263 Humboldt	9.4	79.3	11.3	11.3	73.4	2.4	4.5	4	4.3
6111007614	16.20	28.33	25-30%	7476 Ventura	12.8	79.5	7.7	32.3	56.4	1.5	0.2	6.9	2.7
6067007702	16.20	28.31	25-30%	4306 Sacramento	9.5	65.6	24.9	9	78.7	2.6	0.4	5.6	3.7
6059021807	16.18	28.30	25-30%	4131 Orange	12.5	79.8	7.7	25.9	58.9	2.2	0.3	10.5	2.2
6059021820	16.18	28.29	25-30%	4258 Orange	12.1	76.1	11.8	14.9	58.5	1.2	0.4	22.7	2.4
6045010200	16.18	28.28	25-30%	4155 Mendocino	10.4	75.3	14.3	8.8	77.8	0.6	7	0.9	4.9
6093000300	16.18	28.26	25-30%	4105 Siskiyou	10.9	67.8	21.3	6.8	84.8	0.6	3	0.5	4.3
6093000200	16.18	28.25	25-30%	1955 Siskiyou	13.1	70.9	16	24.9	67.8	0.8	1.9	0.9	3.7
6073014102	16.17	28.24	25-30%	3768 San Diego	14.4	74.6	11	39.2	13	31.2	0.1	12	4.5
6111000100	16.17	28.23	25-30%	819 Ventura	7.6	75.1	17.3	15	81	0.1	0.1	1.5	2.3
6019005909	16.17	28.21	25-30%	4627 Fresno	19.7	74.4	5.9	25.2	46.3	2.3	0.3	23.1	2.9
6037300501	16.16	28.20	25-30%	3868 Los Angeles	9.3	81.8	8.9	13	50.3	0.5	0.2	33.6	2.4
6111001601	16.16	28.19	25-30%	1099 Ventura	12.2	76.7	11.1	34.1	53.2	1.4	0.5	8.3	2.5
6019005504	16.15	28.18	25-30%	2295 Fresno	16.3	76	7.7	19.7	62	1.8	0.4	13.5	2.7
6073020022	16.15	28.16	25-30%	7404 San Diego	15	76.5	8.5	32	55.5	1.8	0.3	7.3	3
6067007107	16.15	28.15	25-30%	3372 Sacramento	16.3	78.3	5.4	13.2	41.8	11.4	0.1	26.7	6.7
6001444301	16.14	28.14	25-30%	3855 Alameda	15.2	74.7	10.1	33.8	30.3	4.6	0.1	26	5.3
6067009612	16.14	28.12	25-30%	5073 Sacramento	15.1	78.2	6.7	23.2	38	12.7	0.3	19.3	6.5
6111000303	16.13	28.11	25-30%	5103 Ventura	16.6	74.2	9.2	70.3	26.6	0.3	0.3	1.3	1.3
6073012302	16.13	28.10	25-30%	1586 San Diego	11.4	66.3	22.3	63.2	23	3.7	0.3	7.1	2.7
6067008208	16.13	28.09	25-30%	4598 Sacramento	12.7	76	11.3	11.3	77.3	2.7	0.8	3.7	4.2
6059063802	16.13	28.07	25-30%	2914 Orange	12.2	70.6	17.2	18.2	73.1	0.7	0.4	4.7	3
6065040806	16.13	28.06	25-30%	2995 Riverside	14.2	78.4	7.4	30.8	58	3.4	0.9	4.8	2.1
6037430701	16.12	28.05	25-30%	5271 Los Angeles	9.9	73.3	16.8	14.6	35.9	1.3	0.2	45.2	2.8
6001441921	16.12	28.04	25-30%	3663 Alameda	12.8	80.8	6.4	27	26.9	3.8	0.3	37.7	4.3
6111004305	16.12	28.02	25-30%	2388 Ventura	21.2	78.3	0.5	16.7	57.9	9.7	0.9	9.5	5.3
6037211000	16.11	28.01	25-30%	4431 Los Angeles	13.2	71.8	15	6.7	61.4	4.5	0	23.8	3.5
6073000500	16.10	28.00	25-30%	2722 San Diego	5.1	84.8	10.1	14.5	74.5	2.6	0.4	4.8	3.3
6037571300	16.10	27.99	25-30%	4414 Los Angeles	11.1	73.1	15.8	26.5	48.9	7.6	0.5	12.7	3.8
6037901008	16.10	27.97	25-30%	2874 Los Angeles	14.7	78.2	7.1	35.9	35.9	16.2	0.6	8.2	3.2
6079012102	16.09	27.96	25-30%	5957 San Luis Obispo	12.4	75.9	11.7	28.8	62.9	0.8	0.6	3.7	3.2
6065043278	16.09	27.95	25-30%	5946 Riverside	15.7	78.3	6	18	64.8	4.3	0.2	9.2	3.4
6085512312	16.08	27.94	25-30%	2899 Santa Clara	13.9	80.1	6	32.2	54.9	1.6	0.3	7.8	3.2
6095252103	16.08	27.92	25-30%	5180 Solano	11	76.6	12.4	14.8	20.8	20.3	0.3	38.5	5.2
6075022704	16.08	27.91	25-30%	3122 San Francisco	8.7	81.1	10.2	8	72.1	1.3	0.3	13.4	4.9
6111007904	16.07	27.90	25-30%	5831 Ventura	11.7	77.2	11.1	28.7	59	1.4	0.6	7.2	3.1
6073019205	16.06	27.88	25-30%	6163 San Diego	12.8	69	18.2	52.2	38.1	2.8	0.2	4.6	2.2
6079012702	16.06	27.87	25-30%	6550 San Luis Obispo	10.4	74.9	14.7	13.2	81.5	0.5	0.8	1.7	2.3
6001443321	16.06	27.86	25-30%	3142 Alameda	17.8	76.6	5.6	7.6	15.2	2.9	0.2	71.2	2.9
6001406900	16.05	27.85	25-30%	3719 Alameda	13	75.7	11.3	12.7	35.8	21.8	0.4	22.9	6.4
6023011200	16.04	27.83	25-30%	3220 Humboldt	10.8	70.6	18.6	8.8	85.8	0.1	1.1	1	3.3
6097153600	16.03	27.82	25-30%	5327 Sonoma	7.8	75.4	16.8	14.2	81	0.4	0.6	1.6	2.1
6013321101	16.02	27.81	25-30%	6549 Contra Costa	9.4	73.4	17.2	15.1	67.5	4.9	0.2	8.2	4.2
6075047801	16.02	27.80	25-30%	4005 San Francisco	7.3	74.9	17.8	5.6	35.4	1.1	0	54.3	3.5
6037300301	16.02	27.78	25-30%	6140 Los Angeles	9.6	76.5	13.9	8.8	60.9	0.6	0.1	26.3	3.3
6067009635	16.01	27.77	25-30%	5941 Sacramento	19.3	75.6	5.1	16.1	30.1	10.6	0.1	36.1	7
6037920329	16.00	27.76	25-30%	5460 Los Angeles	11.6	79.8	8.6	18	68.8	2	0.3	7.8	3
6085506103	16.00	27.75	25-30%	4699 Santa Clara	15.8	71.3	12.9	10	40.3	1.7	0.1	44.4	3.5
6067000300	16.00	27.73	25-30%	3103 Sacramento	11.9	74.4	13.7	11.1	79.7	1.1	0.3	3.8	4
6087100500	15.99	27.72	25-30%	5370 Santa Cruz	7.4	82.8	9.8	12.1	69.1	1.5	0.3	12.6	4.4
6037408705	15.99	27.71	25-30%	5427 Los Angeles	8.8	78.4	12.8	23.3	13.9	1.2	0.2	60	1.5
6037264301	15.99	27.70	25-30%	4646 Los Angeles	3.8	86.2	10	6.8	75.9	1.4	0.1	12.4	3.4
6001451602	15.98	27.68	25-30%	6224 Alameda	10.6	68	21.4	15.6	73.9	1.6	0.2	5.8	2.9
6081603900	15.98	27.67	25-30%	5284 San Mateo	11	76	13	23.1	52.3	1.5	0.2	18.9	3.9
6029000503	15.97	27.66	25-30%	6347 Kern	14.8	76.3	8.9	17.3	74.8	0.8	0.6	3.9	2.6
6037214600	15.97	27.65	25-30%	2411 Los Angeles	6.9	76.8	16.3	7.3	78.2	3.8	0.1	8.1	2.6
6059052422	15.96	27.63	25-30%	4165 Orange	12.4	80.3	7.3	15.2	62.1	2.1	0.1	16.2	4.2
6029005801	15.94	27.62	25-30%	5997 Kern	14.9	79.6	5.5	28.4	52.3	9.5	0.5	5.3	4
6059021826	15.93	27.61	25-30%	2682 Orange	14.2	80.9	4.9	16.8	63.5	1.2	0.1	14.1	4.3
6065042732	15.93	27.59	25-30%	5993 Riverside	17.1	77	5.9	36.3	51.1	4.6	0.2	4.7	3.1
6017030302	15.93	27.58	25-30%	2867 El Dorado	11.4	79.7	8.9	24.5	66.9	0.8	0.6	4.5	2.8
6073013420	15.92	27.57	25-30%	3471 San Diego	14.8	79.4	5.8	50.7	19.2	5.7	0.2	20.5	3.7
6111001602	15.91	27.56	25-30%	2388 Ventura	10.3	67.8	21.9	23.6	69.6	1	0.3	2.7	2.8
6001422800	15.91	27.54	25-30%	8368 Alameda	0.3	98.9	0.8	12.9	32.2	3.9	0.3	44.6	6.1
6029003806	15.90	27.53	25-30%	4889 Kern	15.4	76.4	8.2	22	60.8	2.7	0.4	11.6	2.4
6059001505	15.90	27.52	25-30%	6876 Orange	11.5	75.5	13	20.8	56.4	1.4	0.2	18.7	2.5
6081604900	15.90	27.51	25-30%	3243 San Mateo	8.9	67.3	23.8	5	40.3	0.6	0.1	50.9	3.1
6087101200	15.89	27.49	25-30%	3132 Santa Cruz	7.5	77.8	14.7	13.2	76.8	1.4	0.4	5.1	3
6059062614	15.88	27.48	25-30%	14044 Orange	5	93.1	1.9	12.2	36.9	1.6	0.1	43.8	5.3
6079011200	15.86	27.47	25-30%	7355 San Luis Obispo	5.2	80.4	14.4	10.2	80.6	0.8	0.3	5	3.2
6037265410	15.86	27.46	25-30%	1576 Los Angeles	13.2	72	14.8	6.4	77.2	5.5	0.3	6.9	3.7
6037910205	15.85	27.44	25-30%	1371 Los Angeles	11.5	76.5	12	31.5	49.9	8.5	0.1	7.4	2.6
6065044509	15.85	27.43	25-30%	3939 Riverside	17.9	75.1	7	56.9	29.7	8.2	0.6	2.3	2.3
6037620701	15.84	27.42	25-30%	6704 Los Angeles	12.8	77.7	9.5	14.8	64.3	2.3	0.4	12.8	5.5
6089012603	15.84	27.41	25-30%	4134 Shasta	7	68.3	24.7	5.2	88.7	0.2	1.9	0.8	3.2
6079010204	15.84	27.39	25-30%	5731 San Luis Obispo	15.9	69.8	14.3	30.3	62.5	1.9	0.4	2.9	2
6001420500	15.83	27.38	25-30%	2308 Alameda	12.6	76.4	11	11.2	52.1	4.2	0.1	27.2	5.2
6013324002	15.83	27.37	25-30%	5141 Contra Costa	9.6	76.1	14.3	16.8	60.9	3.6	0.1	14.7	3.9
6035040100	15.82	27.36	25-30%	1822 Lassen	9.4	71	19.6	12.4	81.1	1.5	1.8	0.7	2.5
6065043811	15.81	27.34	25-30%	3877 Riverside	7.8	68.3	23.9	21.2	71.4	1.2	1.6	2.4	2.2
6037143400	15.81	27.33	25-30%	5881 Los Angeles	9.9	77	13.1	10.1	77.1	3.7	0.1	5.2	3.7
6055201602	15.80	27.32	25-30%	3527 Napa	10.8	69.4	19.8	23.1	73.3	0.3	0.1	1.9	1.4
6111006302	15.80	27.30	25-30%	3597 Ventura	7.1	80.7	12.2	13.5	74	2.4	0.3	6.8	3.1
6075011901	15.79	27.29	25-30%	2408 San Francisco	1.6	83.3	15.1	9.1	56.1	3.9	0.5	26.2	4.2
6085505800	15.79	27.28	25-30%	3741 Santa Clara	13.6	74	12.4	22.8	60.6	1	0.3	11.6	3.8
6073001200	15.78	27.27	25-30%	5660 San Diego	8.8	84.7	6.5	33.6	42.4	12.9	0.5	6.1	4.6
6037910713	15.78	27.25	25-30%	5324 Los Angeles	16.9	77.7	5.4	62.4	15.7	16	0.3	3.5	2.1
6067005803	15.78	27.24	25-30%	3545 Sacramento	8.1	63.7	28.2	5.1	83.1	1.2	0.5	7.6	2.4
6019005505	15.78	27.23	25-30%	6613 Fresno	17	74.8	8.2	19.9	56.1	3.4	0.4	16.5	3.6
6037430400	15.78	27.22	25-30%	4424 Los Angeles	10.8	73.7	15.5	9.7	36.3	0.7	0.1	50.6	2.5
6037265602	15.77	27.20	25-30%	3042 Los Angeles	8.3	61.9	29.8	4.3	80	1.3	0	9.6	4.7
6071010419	15.77	27.19	25-30%	4921 San Bernardino	12	71.1	16.9	16.6	75.6	2.5	0.7	1.5	3
6037503601	15.77	27.18	25-30%	4168 Los Angeles	12	70.6	17.4	46.6	42.1	3.5	0.4	5.4	2
6001403502	15.76	27.17	25-30%	1991 Alameda	6	87.7	6.3	12.2	44.2	26.6	0.4	10.9	5.7
6033000701	15.75	27.15	25-30%	4343 Lake	10.1	69.8	20.1	15.5	73.5	4	2.3	1.1	3.6
6085508703	15.75	27.14	25-30%	7572 Santa Clara	14.1	78.1	7.8	15.5	26.1	3	0.2	51.6	3.7
6029002820	15.75	27.13	25-30%	6301 Kern	15.5	78.2	6.3	35	45.6	6.4	0.8	9	3.1

6065043235	15.74	27.12	25-30%	3742 Riverside	21	73.3	5.7	22.9	46.3	7.7	0.3	18.1	4.6
6059110015	15.74	27.10	25-30%	3548 Orange	8.8	74.2	17	14.9	72.3	0.9	0.4	7.1	4.4
6085503115	15.74	27.09	25-30%	6027 Santa Clara	14.1	73	12.9	19.7	41.3	3.4	0.1	31.3	4.3
6065046403	15.74	27.08	25-30%	7156 Riverside	15.3	75.8	8.9	43.1	47.6	2.9	0.6	3.2	2.6
6095252705	15.72	27.07	25-30%	5962 Solano	13.3	79	7.7	24.8	32.5	19.3	0.1	16.1	7.2
6037700700	15.71	27.05	25-30%	3479 Los Angeles	9.6	67	23.4	5.4	84.4	1.8	0	5.2	3.2
6073019406	15.70	27.04	25-30%	4628 San Diego	12.7	75.5	11.8	44.7	44.1	3.8	0.5	4.3	2.7
6065046103	15.69	27.03	25-30%	3030 Riverside	15.5	74.6	9.9	48.1	43.8	3.2	0.4	3.2	1.3
6087121402	15.69	27.01	25-30%	4373 Santa Cruz	11.9	76.6	11.5	33.5	56.6	0.8	0.4	5.6	3
6029005104	15.69	27.00	25-30%	3253 Kern	10	65.4	24.6	17.8	73.4	1.4	0.3	3.7	3.2
6013389100	15.69	26.99	25-30%	2002 Contra Costa	11.1	75.1	13.8	14.5	47.6	4.4	0	28.7	4.7
6085506601	15.68	26.98	25-30%	4482 Santa Clara	14.1	75.5	10.4	21.2	45.2	3.6	0.2	25.4	4.5
6037920334	15.68	26.96	25-30%	6598 Los Angeles	11	72.8	16.2	16.2	70.7	2.2	0.3	7.7	2.9
6073020023	15.68	26.95	25-30%	3941 San Diego	12	76.8	11.2	38.1	53.1	1.8	0.2	4.4	2.4
6083000101	15.67	26.94	25-30%	6495 Santa Barbara	9.8	70.5	19.7	34.2	55.8	2.9	0.4	4.6	2.1
6097150800	15.67	26.93	25-30%	4994 Sonoma	11.9	72.3	15.8	14.8	79.3	0.6	0.2	2.8	2.3
6001441402	15.66	26.91	25-30%	5233 Alameda	13.3	75.6	11.1	11.2	26.6	3.4	0.1	51.3	7.5
6065044904	15.66	26.90	25-30%	4543 Riverside	13	73.2	13.8	43.4	42	4.4	1	7.1	2.2
6085502400	15.65	26.89	25-30%	6813 Santa Clara	12.6	75.6	11.8	19.1	69.2	1.4	0.2	6.6	3.4
6073016614	15.65	26.88	25-30%	3912 San Diego	14	77.8	8.2	16.3	74	1.2	0.3	4.8	3.4
6085512307	15.64	26.86	25-30%	6344 Santa Clara	13.9	72.4	13.7	23.5	63.8	1.4	0.4	7.3	3.5
6059052523	15.63	26.85	25-30%	4175 Orange	10.3	80.9	8.8	9	43	1.2	0	41.6	5.2
6077004305	15.63	26.84	25-30%	5702 San Joaquin	14.5	74.9	10.6	19.7	65.2	1	0.3	10.4	3.3
6075060400	15.63	26.83	25-30%	1689 San Francisco	5.1	76.4	18.5	10.5	55.6	4.2	0.2	24.6	4.9
6065042709	15.62	26.81	25-30%	4905 Riverside	9.1	56.5	34.4	30.4	59.8	4.1	0.6	3.1	2
6111001101	15.62	26.80	25-30%	4491 Ventura	11.4	74.3	14.3	26	69.7	0.2	0.9	1.3	1.9
6037137301	15.62	26.79	25-30%	2264 Los Angeles	10.7	72.5	16.8	7.5	79	2.7	0.4	7.9	2.5
6037430723	15.61	26.78	25-30%	4118 Los Angeles	11.4	76.1	12.5	16.3	22.7	2	0.2	56.7	2.1
6067008140	15.61	26.76	25-30%	2894 Sacramento	13.7	73.5	12.8	13.4	77	3.2	0.6	2.7	3.1
6065044806	15.60	26.75	25-30%	1982 Riverside	5.9	72.3	21.8	19.1	72.1	2.6	1	3	2.2
6065044405	15.60	26.74	25-30%	2366 Riverside	7.9	69.7	22.4	13.4	80.8	1.2	0.8	1.1	2.7
6065045226	15.60	26.72	25-30%	6810 Riverside	22.9	74.3	2.8	91.9	5.1	0.8	0.1	1.3	0.7
6085508503	15.60	26.71	25-30%	6506 Santa Clara	17.9	70.8	11.3	12.2	31.8	1.5	0.3	51.8	2.4
6037920028	15.59	26.70	25-30%	5684 Los Angeles	19.3	76.5	4.2	27.9	52.4	3.6	0.2	12.3	3.6
6023000400	15.58	26.69	25-30%	3873 Humboldt	12.8	73.7	13.5	13.7	73.4	0.7	3.2	5.2	3.9
6059052515	15.57	26.67	25-30%	8833 Orange	16.4	78.3	5.3	8.8	33.1	1.1	0.1	52.6	4.3
6071011404	15.57	26.66	25-30%	3692 San Bernardino	12.6	75.2	12.2	13.1	81.7	0.6	1.1	0.7	2.8
6019005907	15.56	26.65	25-30%	3095 Fresno	18.2	75.1	6.7	23.7	54.7	3.6	0.9	13.2	3.9
6073016810	15.56	26.64	25-30%	2792 San Diego	11.2	78.8	10	13.6	80.6	0.6	0.5	2	2.7
6073020806	15.56	26.62	25-30%	5846 San Diego	16.4	74.2	9.4	38.3	55.6	0.8	0.9	1.9	2.5
6065043217	15.56	26.61	25-30%	3263 Riverside	12.6	79.7	7.7	24.6	59.2	4.5	0.3	7.8	3.5
6073019601	15.55	26.60	25-30%	6291 San Diego	13.8	75.3	10.9	36.2	52.6	3	0.4	3.6	4.2
6037910207	15.55	26.59	25-30%	6023 Los Angeles	14.3	78.9	6.8	38.3	37.1	11.4	0.2	9.5	3.4
6033000502	15.55	26.57	25-30%	2703 Lake	9.9	71.5	18.6	13.9	73.8	2	4.1	1.8	4.3
6073014602	15.54	26.56	25-30%	4729 San Diego	14.7	72.2	13.1	19	58.4	8.8	0.5	9	4.3
6085506703	15.54	26.55	25-30%	3625 Santa Clara	14.2	71.4	14.4	14.3	62.6	3.1	0.3	15.3	4.5
6067009329	15.54	26.54	25-30%	2300 Sacramento	17.4	77.8	4.8	20.3	29.7	13	0.3	30.9	5.7
6115040902	15.53	26.52	25-30%	1737 Yuba	26.1	73.8	0.1	14.2	65.3	9	1.4	4	6
6037403324	15.53	26.51	25-30%	6804 Los Angeles	8	80	12	11.2	16.8	3.4	0.2	66.2	2.2
6059021922	15.53	26.50	25-30%	4834 Orange	11.3	77.7	11	14.7	61	1.8	0.2	18.3	4.1
6073019702	15.52	26.49	25-30%	4933 San Diego	10.8	78.7	10.5	27.7	63.2	1.6	0.3	3.5	3.6
6073009101	15.52	26.47	25-30%	5318 San Diego	9.2	73.2	17.6	14.6	74.7	1.3	0.3	5.2	3.9
6095251804	15.52	26.46	25-30%	3655 Solano	11.4	76.3	12.3	20.8	9.4	13.4	0.2	51.7	4.5
6073020809	15.52	26.45	25-30%	6778 San Diego	14	77	9	34	62	0.4	0.7	1.3	1.7
6073019806	15.51	26.43	25-30%	11116 San Diego	14.7	71.8	13.5	16	66.6	2.4	0.3	10.6	4.2
6097154100	15.51	26.42	25-30%	3729 Sonoma	9.9	74.1	16	29.6	67.3	0.3	0.6	0.7	1.6
6017030301	15.50	26.41	25-30%	2469 El Dorado	11.4	82.2	6.4	28.8	63.8	0.7	0.9	3.2	2.5
6073000202	15.49	26.40	25-30%	4208 San Diego	7.6	79.2	13.2	13.9	75.6	2.4	0.3	4.7	3.2
6065044507	15.48	26.38	25-30%	6565 Riverside	18	74.6	7.4	64.6	25.8	5.8	0.7	1.9	1.3
6001442301	15.48	26.37	25-30%	4388 Alameda	12.8	77.7	9.5	19.8	32.1	3.6	0.3	40.5	3.9
6001442601	15.47	26.36	25-30%	3844 Alameda	12.6	74	13.4	18.8	44.1	1.7	0.2	31.7	3.6
6037431300	15.47	26.35	25-30%	2661 Los Angeles	11.4	78.2	10.4	31.9	42	2.9	0.1	20.4	2.6
6085512035	15.47	26.33	25-30%	4172 Santa Clara	13.7	76	10.3	27.3	47.3	2.8	0.3	17.6	4.6
6111005908	15.46	26.32	25-30%	2711 Ventura	11.7	74.8	13.5	11.4	75.4	1.9	0.3	8	3
6065043250	15.46	26.31	25-30%	8339 Riverside	15.9	77.9	6.2	23.7	49.7	5	0.8	16.4	4.4
6097150203	15.45	26.30	25-30%	4505 Sonoma	9.4	61	29.6	13.9	80.8	0.6	0.3	2.9	1.6
6097150902	15.44	26.28	25-30%	3350 Sonoma	10.9	75.2	13.9	9.9	83.9	0.5	0.4	1.7	3.6
6097150306	15.44	26.27	25-30%	4107 Sonoma	12.2	77.4	10.4	36.4	59.4	0.3	0.3	1.9	1.7
6073013412	15.44	26.26	25-30%	5086 San Diego	11.1	74.8	14.1	48.9	30.3	3.4	0.1	14.7	2.6
6087121500	15.44	26.25	25-30%	4917 Santa Cruz	9	76.7	14.3	22.6	69.6	1.2	0.7	2.6	3.4
6037216100	15.44	26.23	25-30%	2289 Los Angeles	9	74.7	16.3	12.8	43.7	20.8	0.1	17.5	5.1
6085507805	15.44	26.22	25-30%	5397 Santa Clara	12.1	77.2	10.7	9.2	30.1	0.8	0.2	56.1	3.6
6073009301	15.44	26.21	25-30%	4164 San Diego	11.3	77.1	11.6	20	51.1	7.3	0.3	15.5	5.8
6017032000	15.43	26.19	25-30%	1015 El Dorado	9	78	13	4.1	91.4	0.3	0.7	1.3	2.2
6085510700	15.43	26.18	25-30%	4775 Santa Clara	13.2	76.1	10.7	10.6	44.6	3.4	0	37.6	3.7
6081600402	15.42	26.17	25-30%	5068 San Mateo	10.7	76.7	12.6	38.6	7	2.3	0.7	49.7	1.7
6001441401	15.42	26.16	25-30%	6931 Alameda	14.9	75.1	10	15.1	24.1	5.4	0.1	50.4	4.7
6085506502	15.41	26.14	25-30%	3907 Santa Clara	10.5	81.9	7.6	15.7	67	2.2	0.2	10.5	4.4
6041104102	15.41	26.13	25-30%	5135 Marin	13.4	76.6	10	34.3	48.7	4.5	0.3	8.8	3.5
6067007426	15.41	26.12	25-30%	2234 Sacramento	16.1	76.9	7	15.5	52.1	14.1	0.4	10.4	7.5
6037571102	15.40	26.11	25-30%	3877 Los Angeles	12.7	75.3	12	25.4	58.5	4.6	0.3	7.2	3.9
6013332000	15.40	26.09	25-30%	7534 Contra Costa	11.5	73.8	14.7	21.8	63.3	2	0.3	8.4	4.3
6081603801	15.40	26.08	25-30%	2242 San Mateo	8.5	80.8	10.7	19.1	40.1	2.3	0.4	34.3	3.9
6085508602	15.39	26.07	25-30%	3839 Santa Clara	13.9	73.5	12.6	18.2	42.8	1.6	0.5	33.4	3.5
6023011600	15.39	26.06	25-30%	4133 Humboldt	9.1	78	12.9	7.5	84	0.5	2.9	1	4.2
6085511000	15.38	26.04	25-30%	6402 Santa Clara	14.4	73.2	12.4	7.7	48.6	2.4	0.1	36.5	4.7
6017030402	15.38	26.03	25-30%	3723 El Dorado	10.1	78.2	11.7	18.1	75	0.6	0.6	3	2.7
6019004301	15.38	26.02	25-30%	3853 Fresno	6.6	67.9	25.5	9	78.5	1.6	0.1	8.9	1.9
6071000107	15.37	26.01	25-30%	2957 San Bernardino	11.3	78.2	10.5	33.2	51.3	3	0.3	10.1	2
6109001100	15.37	25.99	25-30%	3883 Tuolumne	10.6	70.4	19	9.8	84.4	0.4	1.3	1.3	2.8
6001451505	15.37	25.98	25-30%	3337 Alameda	12.5	79.7	7.8	10.4	79.5	0.5	0.3	5.8	3.5
6089011209	15.36	25.97	25-30%	6113 Shasta	17.5	70.7	11.8	14.8	68.9	2	1.9	8	4.4
6059110114	15.35	25.96	25-30%	4828 Orange	10.8	77.4	11.8	20.9	55.9	1.2	0.4	17.3	4.3
6059032012	15.35	25.94	25-30%	3626 Orange	9.5	74.2	16.3	13.4	77.1	1.5	0.1	4.7	3.2
6037910206	15.34	25.93	25-30%	3246 Los Angeles	19.1	76.9	4	40.7	27	17.3	0.1	11.3	3.6
6037276601	15.34	25.92	25-30%	3838 Los Angeles	10.4	74.8	14.8	11.7	65.7	4.9	0.2	13.3	4.2
6071008401	15.34	25.90	25-30%	9953 San Bernardino	11.6	79.9	8.5	30.4	51.4	4.8	0.2	9.9	3.2
6067009619	15.33	25.89	25-30%	7824 Sacramento	15.1	76.4	8.5	18	36.8	11.2	0.3	27.5	6.2
6007000800	15.32	25.88	25-30%	5295 Butte	12	72.4	15.6	9.5	83.3	1.2	0.7	2.3	2.9
6067008122	15.31	25.87	25-30%	3384 Sacramento	9.7	71.9	18.4	12.1	77.6	2.6	0.5	4.1	3.2
6037400207	15.31	25.85	25-30%	4798 Los Angeles	10.3	73.9	15.8	24.6	62.9	1.6	0.4	7.8	2.7
6075026301	15.31	25.84	25-30%	4875 San Francisco	9.4	75.4	15.2	28.1	9	0.8	0.1	60.5	1.5
6067009330	15.31	25.83	25-30%	3818 Sacramento	16.4	75.8	7.8	14.8	40	8.1	0.4	31.4	5.2
6067008143	15.31	25.82	25-30%	4248 Sacramento	14	77.2	8.8	17.8	72.5	3	0.6	2.3	3.9
6111005100	15.30	25.80	25-30%	3768 Ventura	9.7	75.7	14.6	45.9	46.2	3	0.6	3.2	1.1
6095250501	15.29	25.79	25-30%	2071 Solano	13.4	73.4	13.2	26.4	44	12	1	12	4.5
6095252201	15.28	25.78	25-30%	8761 Solano	14.1	74.1	11.8	12.3	51.4	8.2	0.4	22.7	5
6079012402	15.28	25.77	25-30%	9097 San Luis Obispo	12.9	71.7	15.4	32.4	61.5	0.8	0.6	2.2	2.6
6073010501	15.27	25.75	25-30%	1433 San Diego	10.4	75.7	13.9	32.1	56.6	1.1	0.6	5.7	3.8
6085509500	15.27	25.74	25-30%	5565 Santa Clara	13.6	81.5	4.9	38.8	37.2	2.2	0.2	17.4	4.2
6085502909	15.26	25.73	25-30%	5073 Santa Clara	12.6	75.2	12.2	28.8	53.6	2.5	0.3	10.5	4.4
6059099406	15.26	25.72	25-30%	4468 Orange	10.1	71.7	18.2	14.5	66.9	1	0.5	13.4	3.6
6075026001	15.25	25.70	25-30%	5863 San Francisco	11.1	77.5	11.4	48	11	1.6	0.1	37.2	2
6001406700	15.24	25.69	25-30%	5048 Alameda	11.4	73.9	14.7	8.8	49.5	13.6	0.5	22.4	5.2
6055200602	15.24	25.68	25-30%	4468 Napa	11.9	66.9	21.2	29.7	64.5	0.5	0.2	3.1	1.9
6037297300	15.24	25.67	25-30%	2374 Los Angeles	17.9	66.1	16	21.7	64.4	4.5	0.1	5.4	3.9
6037103101	15.24	25.65	25-30%	2670 Los Angeles	9.6	78.3	12.1	21.2	66	0.7	0.3	9	2.8
6061021129	15.22	25.64	25-30%	3204 Placer	13.4	76.7	9.9	15	75.4	1.5	1.1	3.2	3.8
6065041803	15.21	25.63	25-30%	6475 Riverside	17.5	77.4	5.1	24	50.1	4.5	0.2	17.4	3.8
6037500100	15.21	25.61	25-30%	3540 Los Angeles	8.4	71.2	20.4	25.2	56.4	1	0	14.9	2.5
6037408703	15.20	25.60	25-30%	6528 Los Angeles	9.8	78.3	11.9	7.6	9.2	0.8	0	80.9	1.5
6059021809	15.20	25.59	25-30%	2902 Orange	10.1	71.4	18.5	15.9	73.3	1.2	0.1	7.1	2.4
6085512033	15.19	25.58	25-30%	6125 Santa Clara	13.3	77.1	9.6	27.3	48.3	3.2	0.3	17.2	3.7

6037300901	15.18	25.56	25-30%	6463 Los Angeles	9.8	71.4	18.8	8.3	61.6	0.6	0.1	26.1	3.4
6009000300	15.18	25.55	25-30%	6969 Calaveras	8.3	68.9	22.8	9	83.9	1.1	1.3	1.1	3.5
6023010102	15.18	25.54	25-30%	2884 Humboldt	11.9	71.8	16.3	7.5	64.3	0.2	20.7	1.1	6.1
6001407800	15.17	25.53	25-30%	2425 Alameda	8.3	82.8	8.9	17.5	33.7	32.5	0.4	10.3	5.6
6095252914	15.17	25.51	25-30%	5266 Solano	14.9	79.1	6	22.1	49.1	9.8	0.3	12.3	6.3
6013355109	15.16	25.50	25-30%	6416 Contra Costa	12.1	77	10.9	23.6	40.1	16.2	0.5	14.6	5
6059052519	15.16	25.49	25-30%	4212 Orange	13.7	79.2	7.1	11.4	51.3	1.6	0.2	29.4	6.1
6081601800	15.16	25.48	25-30%	6148 San Mateo	11.5	71.3	17.2	26.9	33.5	1.6	0.3	33.5	4.2
6037141600	15.16	25.46	25-30%	4029 Los Angeles	12	69.7	18.3	5.4	83.9	2.2	0	5.7	2.7
6037108201	15.13	25.45	25-30%	5551 Los Angeles	13.4	75.1	11.5	7.3	41.6	2.1	0	45	3.9
6037930301	15.13	25.44	25-30%	886 Los Angeles	8.3	81.5	10.2	19.2	61.5	11.3	1.4	4.7	1.9
6059099231	15.13	25.43	25-30%	5488 Orange	10.9	70.7	18.4	7.7	64.2	0.5	0.3	24	3.5
6067004005	15.13	25.41	25-30%	4185 Sacramento	8.7	64.6	26.7	14.1	42.8	13.7	0.4	23.5	5.5
6001451601	15.12	25.40	25-30%	4617 Alameda	12.4	76.5	11.1	13.8	75.1	1.4	0.2	6.1	3.4
6059099251	15.12	25.39	25-30%	5218 Orange	11.3	75.8	12.9	22.2	38	1.9	0.4	34.1	3.4
6043000200	15.12	25.38	25-30%	3352 Mariposa	7.6	70.4	22	9.2	85.1	0.6	1.3	1	2.7
6019005524	15.11	25.36	25-30%	4571 Fresno	15.8	77.1	7.1	14.8	65.6	2.9	0.2	13.2	3.3
6059021917	15.10	25.35	25-30%	3435 Orange	9.9	73.3	16.8	11.9	77	0.5	0.1	7.9	2.5
6095250106	15.10	25.34	25-30%	4412 Solano	12.1	78.3	9.6	9	23.1	14.3	0.1	48.2	5.2
6073019206	15.09	25.32	25-30%	5614 San Diego	18.9	73.6	7.5	72.9	20.2	2.2	0.4	2.2	2
6059063201	15.09	25.31	25-30%	3801 Orange	11.5	81	7.5	16.4	73.8	0.9	0.3	4.7	3.8
6111007511	15.08	25.30	25-30%	2222 Ventura	9.8	78	12.2	6.3	81.9	1.8	0	7.2	2.9
6007002601	15.07	25.29	25-30%	2324 Butte	8	64	28	8	82.9	0.7	2.2	2.6	3.5
6065044510	15.07	25.27	25-30%	5808 Riverside	19.9	74	6.1	60.5	25.5	8.6	0.7	2.5	2.3
6089012302	15.06	25.26	25-30%	5450 Shasta	10.5	73.5	16	8.1	84.2	0.3	2.3	1.7	3.2
6063000202	15.06	25.25	25-30%	1161 Plumas	7.4	71.4	21.2	5.7	89.1	0.3	1.9	0.7	2.2
6037401002	15.06	25.24	25-30%	3973 Los Angeles	11.5	75	13.5	24.5	65.9	1	0.3	5.7	2.6
6059021825	15.06	25.22	25-30%	3107 Orange	9	79.5	11.5	11.5	69.9	1.4	0.1	14.1	2.9
6073018803	15.05	25.21	25-30%	4564 San Diego	10.4	68.2	21.4	22.3	70.2	1.2	0.5	3.2	2.5
6085504416	15.04	25.20	25-30%	3591 Santa Clara	13.8	76.5	9.7	12.2	17.6	2.9	0.1	63	4.2
6073019602	15.03	25.19	25-30%	5464 San Diego	14.7	74.8	10.5	42.6	50	2.3	0.5	2.5	2.1
6037189702	15.02	25.17	25-30%	2227 Los Angeles	6.3	79.4	14.3	9.3	77	4.4	0.2	5.7	3.5
6059063103	15.01	25.16	25-30%	2643 Orange	10	75.8	14.2	8.9	84.7	0.8	0.3	2.3	3
6023000300	15.01	25.15	25-30%	5544 Humboldt	13.3	74.1	12.6	10.4	73.1	1.6	2.8	6.7	5.4
6065044604	15.00	25.14	25-30%	4320 Riverside	10.9	71.4	17.7	39.3	49.6	2.7	1.1	5.3	2
6075026003	15.00	25.12	25-30%	4908 San Francisco	10.3	76.2	13.5	38.9	13.1	2.1	0.1	43.2	2.5
6037920039	15.00	25.11	25-30%	1896 Los Angeles	9.4	81.2	9.4	22.5	64.2	1.8	0.3	7.5	3.7
6037108104	14.99	25.10	25-30%	1698 Los Angeles	10.1	71.3	18.6	10.1	62.8	2.8	0.1	21.5	2.8
6079011002	14.99	25.09	25-30%	2877 San Luis Obispo	5.8	82.1	12.1	9.6	82.3	0.6	0.1	4.4	3
6059110001	14.98	25.07	25-30%	4467 Orange	11.1	76.9	12	17.6	63.6	1	0.3	13.8	3.7
6071009109	14.98	25.06	25-30%	6070 San Bernardino	11.4	76.2	12.4	24.7	67.4	1.1	0.5	4.1	2.2
6067009331	14.98	25.05	25-30%	7049 Sacramento	17	77.1	5.9	15.2	38.5	10.4	0.2	29.5	6.2
6065043248	14.97	25.03	25-30%	4214 Riverside	13.5	77.5	9	19.6	59.2	4	0.5	12.4	4.3
6059052514	14.96	25.02	25-30%	5327 Orange	11.8	77	11.2	8.8	53.6	1.6	0.1	29	6.8
6095253203	14.96	25.01	25-30%	4147 Solano	14.1	73.3	12.6	26.5	61.7	3.5	0.5	3.4	4.3
6059110006	14.95	25.00	20-25%	2885 Orange	9.4	71.6	19	12	75	1	0.3	8.7	3
6019005507	14.94	24.98	20-25%	5732 Fresno	11.4	78.9	9.7	19.9	59.6	3.8	0.4	12.8	3.5
6037920033	14.94	24.97	20-25%	515 Los Angeles	7.2	79.6	13.2	24.5	64.9	3.7	0.8	2.9	3.3
6001430600	14.94	24.96	20-25%	5887 Alameda	10.9	74	15.1	14	52.5	4.2	0.4	24.6	4.3
6111005305	14.93	24.95	20-25%	5777 Ventura	8.6	78	13.4	14.5	72.6	0.9	0.2	8.8	3
6037800329	14.92	24.93	20-25%	6421 Los Angeles	11.5	80.5	8	8.4	76.7	1.9	0.2	8.7	4
6037920314	14.92	24.92	20-25%	2909 Los Angeles	12.6	80.1	7.3	21.4	65.5	2.5	0.4	7.8	2.5
6093000100	14.91	24.91	20-25%	1458 Siskiyou	17.4	71.8	10.8	51	44.9	0.3	1	0.1	2.7
6055200803	14.91	24.90	20-25%	2165 Napa	13.3	70.9	15.8	18.8	76.8	0.3	0.3	1.9	1.8
6071008403	14.90	24.88	20-25%	5833 San Bernardino	10.2	73.6	16.2	18.9	67	3.5	0.3	7.3	2.9
6075011200	14.90	24.87	20-25%	3286 San Francisco	4	73.8	22.2	5.7	55.1	1.5	0.1	35.1	2.4
6039000103	14.89	24.86	20-25%	5033 Madera	7.8	64.4	27.8	7.7	85.8	0.3	1.7	1.1	3.3
6029003808	14.89	24.85	20-25%	4439 Kern	15.7	78.9	5.4	27.6	60.4	3.3	0.8	5.1	2.8
6085505008	14.88	24.83	20-25%	5254 Santa Clara	13	85.5	1.5	8.4	27.2	2	0.2	59.3	3
6071000116	14.88	24.82	20-25%	10856 San Bernardino	15.9	79.2	4.9	24.5	33.6	5.3	0.1	32.4	4
6075015300	14.88	24.81	20-25%	2040 San Francisco	6.7	78.4	14.9	7.1	67.5	6.7	0.2	15.3	3.2
6037920116	14.88	24.80	20-25%	5181 Los Angeles	12.6	81.1	6.3	22.3	61.6	2.7	0.4	9.6	3.5
6007000104	14.87	24.78	20-25%	5636 Butte	14.2	72.2	13.6	16.9	70.9	1.8	0.8	5.8	3.8
6085512052	14.87	24.77	20-25%	3988 Santa Clara	11.2	76.6	12.2	22.6	51.9	3.3	0.2	17.1	4.8
6083002932	14.85	24.76	20-25%	2499 Santa Barbara	10.8	79	10.2	27.2	64.7	0.5	0.2	4.8	2.6
6073020709	14.84	24.74	20-25%	8007 San Diego	12.9	76.6	10.5	25.9	62.2	1.4	0.2	8.2	2.1
6065044805	14.83	24.73	20-25%	1701 Riverside	3	67.1	29.9	12.1	81.1	2.2	0.3	3.1	1.2
6111003013	14.83	24.72	20-25%	4657 Ventura	14.4	77.1	8.5	57.6	27.5	3.6	0.1	8.7	2.6
6067009324	14.83	24.71	20-25%	2742 Sacramento	11	76.6	12.4	14	58	4.2	0.9	19.3	3.6
6041102203	14.83	24.69	20-25%	4753 Marin	11.9	75.9	12.2	33.2	54.4	2.6	0.1	6.8	2.8
6065042714	14.83	24.68	20-25%	3230 Riverside	9.4	69.9	20.7	10.9	82.8	0.9	0.7	2.5	2.2
6085504201	14.82	24.67	20-25%	4779 Santa Clara	12	72.8	15.2	34.1	44.2	2.2	0.4	16.3	2.8
6097154202	14.81	24.66	20-25%	5994 Sonoma	11.9	69.2	18.9	23.7	71.5	0.2	1	1.4	2.1
6053010603	14.81	24.64	20-25%	7304 Monterey	16.2	78.5	5.3	61.6	18.5	2.7	0.4	13.6	3.2
6073018515	14.81	24.63	20-25%	4494 San Diego	9.4	71.8	18.8	15	70.8	3.5	0.2	6.9	3.7
6085512021	14.80	24.62	20-25%	6087 Santa Clara	12.3	79.1	8.6	26.4	34.2	4.3	0.3	31.4	3.4
6101050604	14.79	24.61	20-25%	4178 Sutter	12.3	72	15.7	16.2	65.3	3.3	1.1	10.2	3.9
6085503802	14.79	24.59	20-25%	7884 Santa Clara	13.1	75.6	11.3	43	17.8	2.7	0.2	33.5	2.7
6053012700	14.79	24.58	20-25%	3299 Monterey	6.5	79.3	14.2	12	70.1	3.1	0.3	10.8	3.7
6037577501	14.79	24.57	20-25%	3435 Los Angeles	8	68.8	23.2	10.1	82.9	0.8	0.2	3.7	2.3
6001423500	14.77	24.56	20-25%	3118 Alameda	5.8	75.6	18.6	8.2	50.8	19.1	0.3	15.9	5.8
6085512019	14.77	24.54	20-25%	4737 Santa Clara	13.4	77.5	9.1	32	32.2	3.8	0.3	28.1	3.6
6083002806	14.76	24.53	20-25%	2266 Santa Barbara	13.6	73.6	12.8	36.9	50.7	4.3	0.5	4.1	3.5
6073002902	14.76	24.52	20-25%	5272 San Diego	11.2	77.6	11.2	23.8	53.5	8.8	0.5	9.6	3.8
6071009201	14.74	24.50	20-25%	4557 San Bernardino	11.9	74.6	13.5	11.9	83.4	0.7	0.5	1.2	2.3
6073020904	14.74	24.49	20-25%	3075 San Diego	8.8	68.9	22.3	12.4	83.4	0.4	1.2	0.9	1.7
6073013314	14.73	24.48	20-25%	14837 San Diego	19.5	76.8	3.7	44.9	20.1	5.4	0.2	25.1	4.3
6067008136	14.73	24.47	20-25%	2339 Sacramento	13.4	74.2	12.4	11.9	74	3.1	0.2	6.3	4.5
6059099512	14.72	24.45	20-25%	2868 Orange	7	78.5	14.5	12.1	74.9	1.4	0.1	7.7	3.7
6083000102	14.72	24.44	20-25%	5245 Santa Barbara	10.2	74.4	15.4	24.8	63.4	1.7	0.5	6.8	2.9
6083000301	14.72	24.43	20-25%	2810 Santa Barbara	8.3	83.4	8.3	33.2	57.6	1.8	0.1	3.9	3.4
6059011710	14.70	24.42	20-25%	3442 Orange	9.1	72.2	18.7	16.4	65.7	1.6	0.1	14.4	2
6037135201	14.69	24.40	20-25%	2620 Los Angeles	11.3	70.3	18.4	14.5	67.9	3.2	0.2	11.1	3.1
6037910210	14.69	24.39	20-25%	7103 Los Angeles	13.3	80	6.7	26.6	48.6	12.6	0.3	8.5	3.3
6007001703	14.68	24.38	20-25%	2852 Butte	10.2	65.4	24.4	6.8	87.3	0.3	0.9	1.1	3.6
6095252306	14.68	24.37	20-25%	3303 Solano	10.3	72.4	17.3	18.5	50.3	13.6	0.4	11	6.1
6073020902	14.68	24.35	20-25%	2122 San Diego	8.2	77.5	14.3	10.2	84.6	1.5	0.2	1.2	2.2
6111006600	14.68	24.34	20-25%	4019 Ventura	9.8	70.9	19.3	12.3	78.9	1	0.4	4.9	2.5
6067009636	14.67	24.33	20-25%	7672 Sacramento	20.2	74.4	5.4	19.5	26.1	10.7	0.2	37.5	6
6073019106	14.66	24.32	20-25%	9131 San Diego	13	74.6	12.4	31.7	54.5	0.8	7.5	2.5	3.1
6077004202	14.65	24.30	20-25%	1687 San Joaquin	8.8	59.3	31.9	10	82.4	0.6	0.1	4.9	2.1
6037900103	14.65	24.29	20-25%	6170 Los Angeles	16.4	76.3	7.3	55.3	30.8	10	0.5	1.2	2.2
6067009332	14.65	24.28	20-25%	1425 Sacramento	12.8	75.5	11.7	13.3	48.1	2.9	0.1	31.3	4.3
6075015100	14.65	24.27	20-25%	2493 San Francisco	1.2	66.3	32.5	6	60.9	2.6	0.2	26.2	4
6073019903	14.64	24.25	20-25%	4371 San Diego	11.5	76.6	11.9	33	58.2	2.6	0.4	3.2	2.7
6095250105	14.64	24.24	20-25%	6678 Solano	12	78	10	10.3	12.9	17.3	0.2	53.9	5.3
6111001401	14.63	24.23	20-25%	3950 Ventura	12.6	71.9	15.5	24.1	67	0.6	0.6	4.8	2.8
6075022600	14.63	24.21	20-25%	1534 San Francisco	5.2	92.1	2.7	8.6	69.2	4.1	0.2	14.2	3.7
6073020103	14.63	24.20	20-25%	10235 San Diego	12.1	77.2	10.7	23.5	60.5	1.9	0.3	10.9	2.8
6073020305	14.62	24.19	20-25%	5984 San Diego	11.7	72.4	15.9	26.8	59.7	2.7	0.5	7.9	2.5
6085504420	14.62	24.18	20-25%	4555 Santa Clara	11.1	78.5	10.4	11.2	18.6	1.3	0.2	65.7	3
6067007207	14.62	24.16	20-25%	4212 Sacramento	13.8	76.8	9.4	16.2	72.8	2.2	0.9	4.4	3.5
6081609202	14.62	24.15	20-25%	3616 San Mateo	10	77	13	13.3	65.8	1.5	0.2	14.9	4.4
6067009404	14.62	24.14	20-25%	5921 Sacramento	11.3	73.8	14.9	14.6	70.9	3.7	0.9	6.2	3.8
6073009802	14.61	24.13	20-25%	6101 San Diego	11.1	74.3	14.6	17.2	65.8	5.3	0.4	6.7	4.5
6059021827	14.61	24.11	20-25%	3028 Orange	10	82.3	7.7	13.6	61.8	1.4	0.1	19.8	3.3
6111005204	14.61	24.10	20-25%	3367 Ventura	8.5	67.6	23.9	12.5	72.3	1	0.3	10.3	3.5
6065030601	14.60	24.09	20-25%	5249 Riverside	7.7	78.4	13.9	16.5	62.7	5.8	0.4	11.3	3.3
6063000501	14.60	24.08	20-25%	2146 Plumas	10.2	75.3	14.5	8.3	85.3	0.3	1.9	1.2	3
6037262704	14.60	24.06	20-25%	3567 Los Angeles	11.6	70.3	18.1	5	87.1	0.9	0.1	4.4	2.5
6037403407	14.59	24.05	20-25%	2132 Los Angeles	8.6	83.8	7.6	11.5	6.2	1.3	0	78.8	2
6067009312	14.59	24.04	20-25%	6535 Sacramento	15.3	78.3	6.4	19.1	32.3	11	0.4	31.9	5.3
6059063004	14.58	24.03	20-25%	5917 Orange	5.8	67.8	26.4	6.2	82.9	0.9	0.2	7.3	2.6

6055201004	14.58	24.01	20-25%	6081 Napa	13.6	74.1	12.3	25.7	27.5	8.5	0.3	33.4	4.7
6059021822	14.58	24.00	20-25%	7488 Orange	14.3	75	10.7	12.4	58.1	1.2	0.3	24.9	3
6085512005	14.58	23.99	20-25%	6711 Santa Clara	13.5	74.5	12	24.9	49.8	2.9	0.3	18.4	3.6
6001422400	14.57	23.98	20-25%	4196 Alameda	3.1	89.7	7.2	8.2	50.5	4.4	0.1	32.4	4.5
6055201500	14.56	23.96	20-25%	1868 Napa	9	66.7	24.3	28.5	68.9	0.2	0.2	0.9	1.3
6061020717	14.56	23.95	20-25%	3118 Placer	13	81	6	11.7	69.8	2.1	0.3	12.4	3.7
6053013000	14.55	23.94	20-25%	2968 Monterey	6.7	75.3	18	10.4	72.5	2.5	0.7	8.8	5
6081607300	14.55	23.92	20-25%	3529 San Mateo	12.7	67.8	19.5	9.3	67.8	0.8	0.1	17.7	4.4
6037408627	14.54	23.91	20-25%	3079 Los Angeles	8.7	75.2	16.1	24.3	13.6	1.8	0	58.6	1.7
6077004303	14.54	23.90	20-25%	4610 San Joaquin	9.6	66.9	23.5	13.7	78	0.5	0.3	5.4	2.1
6073013313	14.53	23.89	20-25%	9464 San Diego	17.8	77	5.2	40.3	16.1	5.5	0.1	33.8	4.2
6083001901	14.53	23.87	20-25%	7805 Santa Barbara	13.4	74.1	12.5	33.3	61	0.6	0.6	2.4	2.1
6097150304	14.52	23.86	20-25%	6158 Sonoma	14.2	75.2	10.6	40.1	55.2	0.2	0.3	1.8	2.3
6067008704	14.52	23.85	20-25%	3231 Sacramento	22.6	73.3	4.1	12.9	40.5	5.7	0.3	35.2	5.4
6089010602	14.51	23.84	20-25%	5429 Shasta	12.2	72.2	15.6	6.2	83.7	1.2	1.7	3.8	3.5
6035040302	14.51	23.82	20-25%	4422 Lassen	13	75.2	11.8	9.4	84	0.6	2.1	1.4	2.5
6037621326	14.50	23.81	20-25%	3260 Los Angeles	6.7	81.7	11.6	9	77.1	2.3	0.2	8.6	2.9
6067009615	14.50	23.80	20-25%	7864 Sacramento	14.7	78	7.3	21.5	38.4	13.8	0.3	19.5	6.5
6037901007	14.50	23.79	20-25%	2258 Los Angeles	11.5	79.3	9.2	25.6	61.2	5	0.3	4.4	3.5
6111007903	14.49	23.77	20-25%	4855 Ventura	15.8	74.9	9.3	16.2	63.2	1.9	0.2	14.6	3.8
6075022902	14.49	23.76	20-25%	2617 San Francisco	9.9	80.6	9.5	53.6	32.1	2.2	0.2	9.8	2.3
6073008361	14.49	23.75	20-25%	2642 San Diego	6.7	84.9	8.4	9.2	59.8	1.6	0	24.9	4.4
6067007106	14.49	23.74	20-25%	7161 Sacramento	18.2	76.7	5.1	19.1	35.8	13	0.2	25.7	6.1
6073020109	14.49	23.72	20-25%	5127 San Diego	15	77.4	7.6	57.1	32.9	1	0.4	7.1	1.5
6093000600	14.49	23.71	20-25%	1847 Siskiyou	10.2	71.5	18.3	8.1	80.5	1.8	3.8	0.6	5.3
6037262100	14.48	23.70	20-25%	3586 Los Angeles	10.1	66.9	23	5.7	82.5	1.3	0	6.6	3.9
6065048100	14.48	23.69	20-25%	6404 Riverside	16.1	77.7	6.2	23.2	55.2	5.7	0.2	12.2	3.6
6053010305	14.48	23.67	20-25%	4371 Monterey	11.6	77	11.4	35	57.4	0.9	0.5	2.9	3.3
6001428600	14.47	23.66	20-25%	3271 Alameda	8.4	69.1	22.5	8.2	40.6	7.7	0.1	37.7	5.6
6095252107	14.47	23.65	20-25%	3592 Solano	10.8	75.5	13.7	12.8	66.8	5.6	0.4	9	5.3
6109003200	14.47	23.63	20-25%	5765 Tuolumne	10.9	74.2	14.9	9.8	82.3	0.3	3.9	0.9	2.8
6097152904	14.46	23.62	20-25%	5095 Sonoma	13.4	76.8	9.8	24.2	64.2	1.9	0.8	5.4	3.4
6085504315	14.45	23.61	20-25%	6562 Santa Clara	12.7	76.9	10.4	16.8	17.2	3.2	0.2	59.5	3
6001441523	14.45	23.60	20-25%	4077 Alameda	22.8	72.7	4.5	6.2	11.3	2.4	0.3	75.1	4.7
6073018512	14.44	23.58	20-25%	3397 San Diego	5	47.5	47.5	17.3	70.5	3.7	0.3	5	3.2
6067008404	14.44	23.57	20-25%	3275 Sacramento	12.7	73.9	13.4	14.6	74.2	1.5	0.5	5.3	4
6059042103	14.43	23.56	20-25%	7418 Orange	10.9	76.5	12.6	13.6	82.1	0.3	0.1	1.9	2
6073018613	14.42	23.55	20-25%	3477 San Diego	16.1	77.5	6.4	37	40.4	8	0.6	8.7	5.4
6067008142	14.42	23.53	20-25%	3353 Sacramento	13.7	77.8	8.5	19.8	69.8	3.2	0.7	3.2	3.4
6111008304	14.41	23.52	20-25%	5484 Ventura	13.6	74.8	11.6	16.1	68.9	1.3	0.2	9.8	3.7
6095252106	14.41	23.51	20-25%	4132 Solano	10	78.7	11.3	11	63.4	7.2	0.2	12.5	5.8
6037620102	14.40	23.50	20-25%	3617 Los Angeles	9.9	80.9	9.2	14.1	71.5	1.9	0.3	7.8	4.5
6025940000	14.40	23.48	20-25%	3052 Imperial	18	67.8	14.2	37.4	19.7	1.3	38.4	0.3	2.8
6065044807	14.40	23.47	20-25%	1281 Riverside	5.2	68.1	26.7	15.1	74.2	2.5	0	6.1	2.2
6037910807	14.40	23.46	20-25%	5489 Los Angeles	13.2	79	7.8	27.7	55.3	5.6	0.3	7.7	3.3
6061021108	14.39	23.45	20-25%	2668 Placer	12.1	69.3	18.6	13.8	79.3	0.6	1	2.4	3
6037301400	14.39	23.43	20-25%	3865 Los Angeles	10.6	72.8	16.6	7.4	81.2	0.6	0	7.1	3.6
6067008600	14.38	23.42	20-25%	6784 Sacramento	10.6	67.1	22.3	10.4	80.4	2.7	0.5	3.5	2.5
6061021501	14.38	23.41	20-25%	5979 Placer	9.2	75.5	15.3	10.5	82.3	1.1	1.1	2.7	2.1
6067005801	14.38	23.40	20-25%	5050 Sacramento	11	71.5	17.5	10.9	78.1	2.8	0.7	4.3	3.1
6001440332	14.38	23.38	20-25%	3310 Alameda	15.2	77.5	7.3	6.3	8.3	3.6	0	77.4	4.5
6095252000	14.37	23.37	20-25%	4157 Solano	7.9	69.8	22.3	10.3	77.9	2.5	0.3	5.1	3.9
6071000111	14.36	23.36	20-25%	2580 San Bernardino	10.7	81.4	7.9	21.9	52.4	3.4	0.5	19.7	2.1
6019004302	14.36	23.34	20-25%	4848 Fresno	7.3	64.5	28.2	15.7	72.8	2.9	0.2	5.9	2.5
6073008902	14.36	23.33	20-25%	2221 San Diego	4.7	79	16.3	15.4	68.3	4.7	0.1	8.3	3.2
6077004703	14.36	23.32	20-25%	3709 San Joaquin	12.5	72.5	15	24.8	69.7	0.4	0.5	1.8	2.7
6057001206	14.35	23.31	20-25%	6090 Nevada	15	78.5	6.5	38.7	58.1	0.4	0.3	1.1	1.4
6037463500	14.35	23.29	20-25%	5747 Los Angeles	5.8	82.9	11.3	12.2	48.5	3.5	0	31.9	3.8
6001450746	14.35	23.28	20-25%	3152 Alameda	12.1	73.9	14	9	73.3	1.1	0.4	12.8	3.4
6029003203	14.35	23.27	20-25%	2383 Kern	11.8	81.4	6.8	23	70.3	1.7	0.9	2.4	1.6
6065043229	14.34	23.26	20-25%	5127 Riverside	6.4	46.7	46.9	13.4	76.9	2.5	0.2	4.8	2.2
6061020713	14.34	23.24	20-25%	3222 Placer	10.1	63.6	26.3	16.6	74.1	2.9	0.4	2.9	3.2
6065043266	14.33	23.23	20-25%	5215 Riverside	17.1	78.3	4.6	36.7	43.2	4.7	0.7	10.9	3.9
6057000802	14.33	23.22	20-25%	6528 Nevada	7.9	69.8	22.3	5.9	88.9	0.5	0.6	1.3	2.8
6029003813	14.33	23.21	20-25%	7613 Kern	14.5	76	9.5	21.3	64	3.3	0.5	8.4	2.5
6067007905	14.32	23.19	20-25%	4225 Sacramento	10.7	69	20.3	8.6	81.2	2.1	0.4	4.3	3.5
6059110004	14.31	23.18	20-25%	4703 Orange	10.7	71.7	17.6	15.1	70.2	0.7	0.3	10.8	2.9
6083003004	14.31	23.17	20-25%	4874 Santa Barbara	9.9	74.3	15.8	34	56.2	1	0.3	5.9	2.6
6095252801	14.31	23.16	20-25%	2455 Solano	30.8	69	0.2	15.3	57.1	10.7	0.2	8	8.6
6067001600	14.30	23.14	20-25%	5421 Sacramento	10.7	74.9	14.4	13.1	76.1	2.2	0.3	4.4	3.9
6111008005	14.30	23.13	20-25%	2788 Ventura	13.2	77.7	9.1	41.7	50.5	1	0.5	3.9	2.5
6065044925	14.30	23.12	20-25%	3477 Riverside	15.1	75.4	9.5	62.3	27.2	2.8	0.5	6.6	0.7
6075047802	14.28	23.11	20-25%	3656 San Francisco	7.4	76.8	15.8	5.9	37.6	1.4	0.2	50.6	4.2
6059001706	14.27	23.09	20-25%	3869 Orange	7.6	65.5	26.9	10	60.5	1.5	0.1	24.6	3.3
6081601604	14.27	23.08	20-25%	2510 San Mateo	9.5	80	10.5	16.7	27.2	4.1	0	47.9	4
6085502800	14.27	23.07	20-25%	4102 Santa Clara	14.1	74.6	11.3	19.5	64.1	1.1	0.4	10.7	4.2
6067008124	14.25	23.05	20-25%	4478 Sacramento	11.6	74	14.4	9.9	81.7	1.7	0.6	2.9	3.2
6037430802	14.24	23.04	20-25%	4163 Los Angeles	10.2	73.5	16.3	9	25	0.4	0.1	63.1	2.5
6023010600	14.24	23.03	20-25%	1798 Humboldt	8.1	74.9	17	3.2	90	0.4	1.8	0.9	3.7
6067007105	14.23	23.02	20-25%	6725 Sacramento	20.7	75.6	3.7	19.7	33.8	14.7	0.3	25	6.5
6045011200	14.23	23.00	20-25%	3293 Mendocino	12.6	73.6	13.8	38.1	58.4	0.5	0.8	0.6	1.7
6085506503	14.22	22.99	20-25%	6045 Santa Clara	12	74.5	13.5	24.6	50.5	4	0.3	16.5	4.2
6037214700	14.22	22.98	20-25%	2512 Los Angeles	8.3	76.5	15.2	9.3	79	2.8	0.1	6	2.7
6007000102	14.22	22.97	20-25%	3900 Butte	11.1	70.3	18.6	12.2	79.3	1.3	0.9	3	3.3
6001423602	14.21	22.95	20-25%	5659 Alameda	1.9	94.4	3.7	8.9	42.8	2.5	0.2	40.6	5.1
6067008120	14.20	22.94	20-25%	4873 Sacramento	11.8	78.3	9.9	15.7	72	3.3	0.7	4.5	3.9
6085506302	14.20	22.93	20-25%	6388 Santa Clara	12.9	76.5	10.6	19.6	52.1	3.6	0.2	20.5	4.1
6065941300	14.19	22.92	20-25%	3300 Riverside	6.4	73.1	20.5	18.5	69.5	4.2	0.5	4.7	2.5
6073010011	14.19	22.90	20-25%	3633 San Diego	11.6	74.8	13.6	61.1	11.1	5.7	0.1	18.2	3.8
6075025600	14.19	22.89	20-25%	5618 San Francisco	9.6	75.3	15.1	28	12.7	2.4	0.2	54	2.8
6111007505	14.18	22.88	20-25%	3324 Ventura	10.1	76.1	13.8	21.4	70.7	0.7	0.4	4.3	2.5
6059021828	14.18	22.87	20-25%	4362 Orange	9.7	84.3	6	12.1	60.8	1.8	0.1	21.3	4
6071008302	14.17	22.85	20-25%	3106 San Bernardino	9.2	71.5	19.3	15	76.1	1.5	0.3	5	2.2
6111001900	14.16	22.84	20-25%	3822 Ventura	11	73.1	15.9	16.7	75.9	0.8	0.5	2.8	3.3
6001423901	14.16	22.83	20-25%	2020 Alameda	8.6	81.3	10.1	10.9	54.7	20.8	0.3	7.5	5.7
6019006402	14.16	22.81	20-25%	2973 Fresno	11	71.1	17.9	9	77.3	0.2	10.8	0.6	2.2
6081608501	14.15	22.80	20-25%	4829 San Mateo	14.5	74.9	10.6	26.5	52.9	1.6	0.2	14.3	4.4
6065043272	14.15	22.79	20-25%	4976 Riverside	10.3	72.7	17	16.2	75	2.1	0.6	3.8	2.2
6113011204	14.15	22.78	20-25%	4672 Yolo	13.6	72.4	14	37.9	55.7	0.9	0.7	3.1	1.7
6059075813	14.14	22.76	20-25%	5069 Orange	10.3	75.2	14.5	25	56.1	0.5	0.4	15	3
6113011500	14.14	22.75	20-25%	5325 Yolo	13	74.5	12.5	43.8	48.1	1.7	1.5	2.9	2
6053010202	14.13	22.74	20-25%	4386 Monterey	13.9	75.6	10.5	53.1	41.4	0.3	0.5	2.5	2.2
6073017809	14.13	22.73	20-25%	2293 San Diego	9.7	75.8	14.5	15.1	78.5	0.2	0.3	2.4	3.4
6037920118	14.12	22.71	20-25%	6117 Los Angeles	16.8	78.4	4.8	23.1	55	3.7	0.1	14.9	3.2
6075015200	14.11	22.70	20-25%	3934 San Francisco	4.7	72.3	23	6.7	60.1	3.6	0.3	25	4.4
6039000108	14.11	22.69	20-25%	7068 Madera	8.6	64.8	26.6	8.8	83.4	0.4	3.4	0.8	3.2
6017030602	14.09	22.68	20-25%	6781 El Dorado	8.7	73.8	17.5	7.1	86.6	1.1	1.2	0.9	3.1
6001450741	14.07	22.66	20-25%	4768 Alameda	13.3	71.9	14.8	18	63.8	1.9	0.4	12.4	3.5
6085503331	14.07	22.65	20-25%	3173 Santa Clara	8.1	64.4	27.5	20.6	40.2	3.8	0.4	32	3.1
6067008402	14.06	22.64	20-25%	5505 Sacramento	12.1	75.3	12.6	13.8	78.3	0.8	0.5	3.1	3.5
6079012304	14.06	22.63	20-25%	8954 San Luis Obispo	9	67.6	23.4	19.6	74.2	0.8	0.4	2.9	2.1
6085512037	14.05	22.61	20-25%	3214 Santa Clara	13.3	76.9	9.8	30.4	45.6	3.7	0	15.5	4.7
6089011300	14.05	22.60	20-25%	5073 Shasta	15.4	72.1	12.5	11.2	76.3	1.5	2.5	4.8	3.8
6045010100	14.04	22.59	20-25%	2587 Mendocino	14.6	70.9	14.5	11.8	42.6	1.2	37.5	0.5	6.4
6081607800	14.04	22.58	20-25%	3160 San Mateo	11.5	73.2	15.3	26.2	42.4	1.1	0.3	24.4	5.5
6037400204	14.03	22.56	20-25%	6454 Los Angeles	8.4	78.6	13	19	64.3	3.4	0.3	10.5	2.5
6065030603	14.03	22.55	20-25%	2978 Riverside	8.8	71.2	20	15.4	77.3	2.5	0.2	2.5	2.1
6073020805	14.03	22.54	20-25%	3501 San Diego	12.8	78.3	8.9	35	59.5	0.9	0.7	1.8	2.1
6067008005	14.03	22.52	20-25%	4715 Sacramento	9.1	72.4	18.5	8.6	81.5	1.2	0.6	5.1	3
6081604000	14.02	22.51	20-25%	3160 San Mateo	13.2	72.3	14.5	20.3	56.3	1	0.2	18.1	4.1
6113010510	14.01	22.50	20-25%	5267 Yolo	4.9	85.6	9.5	11.1	58.5	1.6	0.1	24.3	4.4
6001441302	14.01	22.49	20-25%	5553 Alameda	14.1	72.2	13.7	15.5	33.9	3.7	0.2	40.9	5.9
6097152201	14.00	22.47	20-25%	3846 Sonoma	10.6	82.1	7.3	18.3	70.1	3.1	1.1	3.5	3.9

6073020105	14.00	22.46	20-25%	3801 San Diego	12.9	76	11.1	29.5	59.6	3.1	0.8	4.8	2.2
6065941000	14.00	22.45	20-25%	3812 Riverside	4.8	50.1	45.1	14.3	79.2	3.1	0.2	1.7	1.4
6065043262	14.00	22.44	20-25%	5122 Riverside	11.9	76.9	11.2	18.3	70.6	2.4	0.7	4.6	3.5
6065045304	14.00	22.42	20-25%	8675 Riverside	19.4	75.3	5.3	58.3	33.2	2.2	0.6	4	1.7
6037901004	13.99	22.41	20-25%	12544 Los Angeles	16.7	77	6.3	32.3	39.1	16.2	0.4	8.8	3.3
6037800203	13.99	22.40	20-25%	5643 Los Angeles	10.6	77.7	11.7	7.4	80.9	1.7	0.2	6.5	3.3
6073004300	13.99	22.39	20-25%	3665 San Diego	9.4	82.5	8.1	21.2	66.3	4.6	0.4	3.4	4.1
6053013800	13.99	22.37	20-25%	5548 Monterey	12.6	74.8	12.6	44.8	17.2	16.6	0.3	15	6.2
6085503329	13.99	22.36	20-25%	3461 Santa Clara	16.4	75.6	8	14.3	15.1	2.3	0.1	65.1	3.1
6089011001	13.98	22.35	20-25%	1668 Shasta	9.7	76.2	14.1	4.4	87.2	0.5	1.9	2.3	3.7
6037462600	13.97	22.34	20-25%	2324 Los Angeles	11.9	72.8	15.3	19	60.5	5	0.1	11.4	4
6073013415	13.96	22.32	20-25%	1567 San Diego	12.3	74.2	13.5	49.7	30.1	4.5	0.2	12.6	2.9
6075045100	13.95	22.31	20-25%	4996 San Francisco	7.5	80.1	12.4	6.7	40.1	2	0.1	46.8	4.3
6065044924	13.95	22.30	20-25%	3984 Riverside	13.9	78.4	7.7	57	32.4	3	0.4	4.7	2.5
6075015400	13.95	22.29	20-25%	5621 San Francisco	8.9	77.1	14	6.5	64.5	2.7	0.1	22.5	3.7
6007002000	13.94	22.27	20-25%	5184 Butte	9.5	67.4	23.1	6.8	86.9	0.4	1	1.3	3.5
6037571200	13.93	22.26	20-25%	7828 Los Angeles	9.9	77.2	12.9	25	54.2	6	0.3	11.1	3.5
6073018609	13.92	22.25	20-25%	6133 San Diego	15.5	77.5	7	52.6	28.7	5.9	0.3	8.9	3.7
6061021046	13.92	22.23	20-25%	4754 Placer	12.7	72.9	14.4	15.4	69.3	2.1	0.5	9.3	3.4
6065940700	13.92	22.22	20-25%	2613 Riverside	5.7	54.4	39.9	13.5	79.3	1.8	0.7	3.3	1.5
6045011102	13.91	22.21	20-25%	3915 Mendocino	9.6	71	19.4	20.1	72.6	0.3	3.7	0.7	2.7
6013304005	13.90	22.20	20-25%	6738 Contra Costa	19.6	76.4	4	21.6	62.3	5.9	0.4	5.6	4.1
6065044923	13.88	22.18	20-25%	3615 Riverside	13.9	77.6	8.5	51.5	37.7	2.6	0.6	5.8	1.7
6073020903	13.88	22.17	20-25%	3192 San Diego	7.9	70.4	21.7	14.6	64.3	1.3	15.6	1.6	2.5
6051000200	13.88	22.16	20-25%	8237 Mono	12.2	81.3	6.5	33.7	62.4	0.4	0.4	1.6	1.5
6065045121	13.87	22.15	20-25%	5457 Riverside	7.2	56	36.8	14.6	79.5	1.5	0.1	3	1.3
6037503602	13.87	22.13	20-25%	3793 Los Angeles	9.2	72.4	18.4	36.6	48.8	1.4	0.2	11.3	1.7
6113010703	13.87	22.12	20-25%	5854 Yolo	2.8	89.4	7.8	11.1	49	1.4	0.2	33.3	5
6001423902	13.87	22.11	20-25%	1552 Alameda	7.8	79.6	12.6	8.6	72.4	3.4	0.3	9.7	5.6
6059021919	13.86	22.10	20-25%	2662 Orange	9.5	74	16.5	13.1	67.3	1.9	0.2	13.8	3.6
6071002031	13.85	22.08	20-25%	6281 San Bernardino	12.6	82	5.4	30.1	41.4	8.4	0.2	16.4	3.6
6019005702	13.85	22.07	20-25%	5243 Fresno	12.6	78.2	9.2	19.5	67.3	1.4	0.8	8	3
6087100600	13.85	22.06	20-25%	3341 Santa Cruz	9.3	81.2	9.5	12.4	76.4	0.8	0.3	5.8	4.2
6037500201	13.85	22.05	20-25%	6179 Los Angeles	10.5	70.9	18.6	37.2	53.7	0.6	0.1	6.7	1.7
6089010703	13.84	22.03	20-25%	3240 Shasta	9.1	71.6	19.3	8.1	81.7	1.6	1.5	3.9	3.3
6097150702	13.84	22.02	20-25%	4552 Sonoma	11.1	73.5	15.4	7.5	86	0.6	0.1	3	2.8
6037577604	13.84	22.01	20-25%	1388 Los Angeles	5.4	68.2	26.4	9.2	78.6	2.5	0.1	6.2	3.3
6037461200	13.82	22.00	20-25%	4443 Los Angeles	11.3	71.6	17.1	14.1	65.7	9.5	0.2	6.2	4.3
6073021302	13.81	21.98	20-25%	7361 San Diego	5.5	85.8	8.7	34.4	51.7	9	0.4	2.8	1.8
6085504415	13.80	21.97	20-25%	5116 Santa Clara	14.8	74.7	10.5	11.5	18	1.9	0.1	65.2	3.3
6051000102	13.80	21.96	20-25%	2502 Mono	13.7	69.2	17.1	21.4	70.2	0.4	5.1	0.8	2.1
6085502604	13.80	21.94	20-25%	4320 Santa Clara	10.5	81.6	7.9	22.9	54.6	4	0.3	14.3	3.8
6081608004	13.79	21.93	20-25%	6521 San Mateo	14.3	72.3	13.4	6	38.8	1.5	0.1	49.4	4.3
6019005508	13.79	21.92	20-25%	5796 Fresno	15.9	74.8	9.3	15.5	55.6	3.6	0.4	21.1	3.7
6023010300	13.79	21.91	20-25%	3607 Humboldt	10.4	77.2	12.4	5	84.5	0.4	4.9	0.9	4.3
6085512045	13.78	21.89	20-25%	5602 Santa Clara	12.4	76.3	11.3	25.8	53.2	2.1	0.3	14.6	4
6065044916	13.78	21.88	20-25%	4650 Riverside	13.5	70	16.5	49.9	41.2	2.6	0.6	4	1.7
6037651402	13.76	21.87	20-25%	6050 Los Angeles	11.8	75.5	12.7	10.7	45.1	1.6	0.1	37.9	4.6
6073009106	13.76	21.86	20-25%	3882 San Diego	4.4	88.1	7.5	17.3	70.5	1.7	0.4	6.1	4
6065043246	13.75	21.84	20-25%	5906 Riverside	16.5	74.5	9	18	66.8	2.9	0.3	8.4	3.5
6059099306	13.74	21.83	20-25%	6028 Orange	10.4	83.6	6	12.2	77.1	0.5	0.3	6.1	3.8
6073017048	13.73	21.82	20-25%	6123 San Diego	14.6	76.7	8.7	28.2	50.8	2.7	0.4	14.3	3.7
6037920339	13.73	21.81	20-25%	7377 Los Angeles	17	78.3	4.7	13.5	52.3	3.1	0.2	26.6	4.3
6017031000	13.72	21.79	20-25%	6061 El Dorado	12	70.7	17.3	20.1	75.4	0.6	0.9	1	2.1
6059042315	13.72	21.78	20-25%	5900 Orange	10.7	77.7	11.6	15.2	72.5	1.4	0.1	7.3	3.5
6013324001	13.72	21.77	20-25%	4615 Contra Costa	9	77	14	13.5	57.4	3.8	0.2	19.9	5.2
6037620001	13.71	21.76	20-25%	3943 Los Angeles	10	78.7	11.3	15.4	70.3	1.8	0.2	8.2	4.1
6037701601	13.71	21.74	20-25%	4165 Los Angeles	11.2	72.4	16.4	5.4	77.2	1.1	0	10.5	5.9
6097153705	13.71	21.73	20-25%	3536 Sonoma	7.9	78	14.1	11.3	82.8	0.8	0.8	1.8	2.5
6079010201	13.71	21.72	20-25%	6981 San Luis Obispo	13.9	66.7	19.4	18.8	74.4	1.6	0.4	2.2	2.6
6015000105	13.69	21.71	20-25%	6967 Del Norte	13.1	72.7	14.2	11.7	73.2	0.4	5.3	4.9	4.4
6037920331	13.69	21.69	20-25%	4075 Los Angeles	11.3	74.3	14.4	19	67.3	2	0	8.5	3.1
6001450751	13.69	21.68	20-25%	2115 Alameda	22.3	73	4.7	6.8	31.8	3.6	0	53.9	4
6037400206	13.68	21.67	20-25%	5328 Los Angeles	9.4	72.6	18	17.5	60.5	2.6	0.2	16	3.2
6111005404	13.68	21.65	20-25%	3870 Ventura	11.5	73.9	14.6	31.2	57.7	1.9	0.3	6	2.9
6081603802	13.68	21.64	20-25%	5056 San Mateo	11.2	71.1	17.7	17	53.4	1.8	0.1	23.4	4.3
6071011403	13.68	21.63	20-25%	3350 San Bernardino	11.4	72.3	16.3	15.8	78.2	0.5	1.3	0.9	3.3
6097151307	13.67	21.62	20-25%	5174 Sonoma	10.8	79.3	9.9	15.3	72.9	1.3	0.5	6.5	3.6
6075035300	13.67	21.60	20-25%	7226 San Francisco	8.3	74.6	17.1	5.6	27	0.7	0.1	63.8	2.8
6059099310	13.65	21.59	20-25%	4482 Orange	7.5	85.4	7.1	9.9	79.2	0.7	0.3	6.3	3.5
6061021322	13.65	21.58	20-25%	8762 Placer	19.8	69.7	10.5	11.1	65.5	2.3	0.4	16.5	4.1
6001422700	13.64	21.57	20-25%	4885 Alameda	2	96.2	1.8	10.2	52.6	2.3	0.2	29.2	5.5
6075026302	13.64	21.55	20-25%	4992 San Francisco	9.5	76.9	13.6	25.2	13.9	4	0.1	54.5	2.2
6085510801	13.62	21.54	20-25%	5290 Santa Clara	12.7	68.3	19	3.7	52.8	0.9	0	38.8	3.8
6037574300	13.62	21.53	20-25%	5795 Los Angeles	11	73.5	15.5	15.8	68.9	2.5	0.1	8.9	3.9
6013359204	13.60	21.52	20-25%	4702 Contra Costa	8.7	78.7	12.6	15.5	14.5	15.2	0.2	50.7	3.9
6095253106	13.59	21.50	20-25%	3296 Solano	15	78.5	6.5	26.2	53.4	9.2	0.6	5.4	5.3
6029005403	13.59	21.49	20-25%	8379 Kern	15.6	73.3	11.1	20	67.1	3.6	1	4.7	3.7
6073021600	13.59	21.48	20-25%	3391 San Diego	13.5	73.2	13.3	15.8	71.5	4.7	0.6	3.5	3.9
6067009632	13.58	21.47	20-25%	6811 Sacramento	19	74.7	6.3	17.1	25.8	13.4	0.1	37.3	6.3
6061021103	13.58	21.45	20-25%	3797 Placer	14.5	75.2	10.3	18	74	1	0.7	2.5	3.8
6037265601	13.58	21.44	20-25%	2890 Los Angeles	11.6	72.4	16	5.8	74.7	0.9	0.1	13.3	5.3
6087100800	13.57	21.43	20-25%	6873 Santa Cruz	9.4	84.3	6.3	27.2	63.2	1.4	0.3	3.9	3.9
6075025300	13.57	21.42	20-25%	4362 San Francisco	9.7	81.5	8.8	28.6	53.4	2.5	0.3	11.6	3.6
6067007431	13.57	21.40	20-25%	3355 Sacramento	13.6	79.6	6.8	14.5	55	7.2	0.5	17.4	5.3
6057000702	13.57	21.39	20-25%	3968 Nevada	7	72.1	20.9	5.8	89.2	0.2	1	1.1	2.7
6037403405	13.56	21.38	20-25%	1631 Los Angeles	7.7	80.9	11.4	13.9	14.2	1	0.1	67.7	3
6073008357	13.55	21.36	20-25%	4345 San Diego	11	79.5	9.5	12	21.8	3.4	0.2	57.7	4.9
6037264103	13.54	21.35	20-25%	2319 Los Angeles	5.6	82.6	11.8	5	78.1	1.5	0.2	11.2	3.9
6059099513	13.53	21.34	20-25%	2141 Orange	4.5	71.3	24.2	8.5	80.1	1.2	0.2	7.6	2.4
6085502701	13.51	21.33	20-25%	4874 Santa Clara	13.5	73.9	12.6	20	59.1	2.6	0.3	13.8	4.2
6037920020	13.50	21.31	20-25%	6954 Los Angeles	12.8	78.7	8.5	22.5	67.1	1.9	0.2	5	3.2
6095253206	13.50	21.30	20-25%	3102 Solano	16.4	77.2	6.4	16.8	65.2	4.2	0.2	8.4	5.2
6085504202	13.49	21.29	20-25%	4530 Santa Clara	10.2	74.3	15.5	32.4	39.4	3.3	0.1	21.7	3.2
6111008305	13.49	21.28	20-25%	3819 Ventura	12.9	79.5	7.6	11.3	65.7	1.5	0.1	18	3.5
6017030401	13.49	21.26	20-25%	3498 El Dorado	8	76.9	15.1	12.5	81.8	0.4	0.6	2.5	2.2
6095252315	13.48	21.25	20-25%	4393 Solano	11.3	78.5	10.2	19.5	36.3	16.6	0.3	20.3	7.1
6095252915	13.47	21.24	20-25%	3506 Solano	13.2	81.9	4.9	15	49.8	10.2	0.4	17.3	7.2
6073013421	13.47	21.23	20-25%	4695 San Diego	11	79.8	9.2	50.1	19.1	3.7	0.1	24.3	2.6
6073013506	13.47	21.21	20-25%	3509 San Diego	12.7	78	9.3	34.6	48.4	6.3	0.3	6.7	3.6
6067008203	13.47	21.20	20-25%	4760 Sacramento	9.7	73.9	16.4	8.4	84.1	0.7	0.6	2.9	3.4
6043000302	13.47	21.19	20-25%	2706 Mariposa	8.8	68.7	22.5	11.3	81.7	0.2	2.7	0.7	3.5
6055200707	13.46	21.18	20-25%	3152 Napa	10.4	68.6	21	22.5	71.5	0.5	0.2	2.9	2.4
6059063007	13.46	21.16	20-25%	6958 Orange	8.7	71.2	20.1	7.4	79.6	0.5	0.2	9.7	2.5
6073017035	13.46	21.15	20-25%	2354 San Diego	12.4	73.7	13.9	15.3	47.8	4.2	0.1	24.9	7.6
6007001600	13.45	21.14	20-25%	5266 Butte	10.3	76.2	13.5	6.6	86.8	0.5	0.9	2.1	3.1
6037500202	13.42	21.12	20-25%	4935 Los Angeles	10.6	68.9	20.5	44.5	42.7	0.9	0.1	10.7	1.2
6059032054	13.41	21.11	20-25%	5288 Orange	14.4	73.7	11.9	24.7	61	2	0.2	9.1	3.1
6037272100	13.41	21.10	20-25%	4354 Los Angeles	12.1	75.9	12	24.4	60.8	1.7	0.2	8.8	4.1
6059021810	13.41	21.09	20-25%	3627 Orange	11.8	73.9	14.3	19	68.3	1.7	0.3	8.1	2.6
6111001102	13.40	21.07	20-25%	3539 Ventura	9.2	75.3	15.5	19.8	75	0.5	0.5	2	2.2
6067007417	13.39	21.06	20-25%	3012 Sacramento	13.7	77.8	8.5	13	56.1	9.4	1	15.2	5.3
6037651222	13.39	21.05	20-25%	6211 Los Angeles	11	79.4	9.6	12.9	42.5	2.5	0.2	37.3	4.5
6057000105	13.37	21.04	20-25%	2792 Nevada	8.5	75	16.5	5.7	89.8	0.8	1	0.6	2.1
6073016610	13.37	21.02	20-25%	4163 San Diego	14.4	78.1	7.5	15.1	75.6	1.2	0.4	3.7	4.1
6113010508	13.37	21.01	20-25%	2453 Yolo	7.8	80	12.2	9.7	71.5	1.1	0.1	13	4.6
6067009622	13.36	21.00	20-25%	7222 Sacramento	14.5	75	10.5	16.1	41.2	11.6	0.2	24.3	6.5
6073017404	13.36	20.99	20-25%	6338 San Diego	11.4	74.1	14.5	16.5	76.8	0.5	0.4	3.4	2.4
6059052505	13.35	20.97	20-25%	4916 Orange	9.8	72.1	18.1	13.3	45.4	2	0.1	35.7	3.5
6037267902	13.35	20.96	20-25%	3375 Los Angeles	11.3	72.9	15.8	5.7	77.1	2	0	10.8	4.4
6073022100	13.35	20.95	20-25%	9082 San Diego	15	75.1	9.9	17.8	66.2	2.2	0.2	9.7	3.9
6085512034	13.35	20.94	20-25%	3101 Santa Clara	14.6	77.8	7.6	28.6	45.2	4.1	0.4	18.1	3.5
6075026303	13.34	20.92	20-25%	4551 San Francisco	10.1	74.3	15.6	27	11.6	1.6	0.1	57.8	2

6021010502	13.33	20.91	20-25%	1564 Glenn	14.7	70.2	15.1	22.1	75.1	0.3	1	0.6	1
6059052426	13.33	20.90	20-25%	7957 Orange	14.5	82	3.5	11.6	56	1.5	0.2	26.3	4.4
6061021502	13.32	20.89	20-25%	3554 Placer	9.8	72.5	17.7	7.9	86.4	0.8	0.9	1.6	2.4
6065043218	13.31	20.87	20-25%	5597 Riverside	10.5	80.7	8.8	23.9	66.4	2.4	0.5	4.4	2.5
6001451704	13.30	20.86	20-25%	4449 Alameda	13.2	73.9	12.9	17.4	70.6	1.6	0.3	6.5	3.6
6013334004	13.28	20.85	20-25%	7367 Contra Costa	11.3	73.6	15.1	21.2	53.8	4.1	0.3	15.4	5.2
6079012000	13.28	20.83	20-25%	7232 San Luis Obispo	12.9	75.2	11.9	29.5	61.8	0.9	0.5	4.5	2.8
6097150610	13.27	20.82	20-25%	4004 Sonoma	13.5	78.4	8.1	17.2	71.8	1.9	0.5	5.7	2.9
6095250104	13.27	20.81	20-25%	2280 Solano	9.8	69.1	21.1	13.1	30.7	14.3	0.3	37.8	3.7
6073017604	13.27	20.80	20-25%	7040 San Diego	11.9	70.3	17.8	16.3	73.4	0.9	0.2	6.8	2.4
6037400402	13.26	20.78	20-25%	4125 Los Angeles	9.6	76.7	13.7	23.4	63.9	1	0.1	8.9	2.7
6061021603	13.25	20.77	20-25%	4549 Placer	13.6	62.4	24	25.6	67.9	0.8	0.9	2.6	2.3
6075016400	13.25	20.76	20-25%	3778 San Francisco	4.7	85.7	9.6	12.7	62.7	9.4	0.3	9.8	5.2
6017030200	13.24	20.75	20-25%	4773 El Dorado	13.2	77.6	9.2	44.2	48.4	0.6	0.5	4.6	1.6
6073013604	13.22	20.73	20-25%	6147 San Diego	12.2	78.8	9	15.6	70.2	5.4	0.2	4.3	4.2
6059075604	13.20	20.72	20-25%	7487 Orange	9.2	71.9	18.9	10.1	74	0.6	0.1	12.4	2.8
6111005700	13.20	20.71	20-25%	2068 Ventura	11.3	87.3	1.4	25	58.7	3.4	0.4	6.9	5.6
6065047202	13.20	20.70	20-25%	1929 Riverside	7.3	58.7	34	27.5	68.6	1.1	0.4	0.7	1.6
6113011103	13.19	20.68	20-25%	3118 Yolo	16.3	76.8	6.9	50.4	38.6	1.4	0.5	7.2	1.8
6085512503	13.19	20.67	20-25%	7726 Santa Clara	15.9	76.4	7.7	32.2	50.4	2.5	0.3	11.6	3
6073020106	13.19	20.66	20-25%	3803 San Diego	13.5	75.9	10.6	43.4	44.9	1.1	0.6	7.6	2.3
6089010806	13.18	20.65	20-25%	3192 Shasta	12.5	69.9	17.6	7.3	83.1	1.1	2.4	1.8	4.4
6067008008	13.17	20.63	20-25%	4610 Sacramento	8.7	69.7	21.6	8.7	82.3	1.6	0.8	3	3.6
6073020705	13.17	20.62	20-25%	4635 San Diego	12.4	74.4	13.2	33.2	58.2	1.2	0.3	5.1	2
6073009305	13.17	20.61	20-25%	4488 San Diego	8.9	81.3	9.8	17	59.4	5	0.4	13.6	4.6
6067005701	13.17	20.60	20-25%	3060 Sacramento	11.1	69.9	19	10.6	76.7	2.2	0.9	6	3.7
6037920114	13.17	20.58	20-25%	6490 Los Angeles	17	79.2	3.8	16.8	55.5	3.9	0.3	19.6	4
6013359202	13.16	20.57	20-25%	6148 Contra Costa	9.1	72.6	18.3	21.5	46.7	7.3	0.3	18.9	5.3
6085507701	13.16	20.56	20-25%	4039 Santa Clara	11.2	76.1	12.7	2.8	32.5	0.3	0.1	61.8	2.6
6065042733	13.15	20.54	20-25%	4234 Riverside	17.9	74.4	7.7	32.4	53.2	4.3	0.3	7.4	2.4
6071000814	13.15	20.53	20-25%	3832 San Bernardino	9.2	73.3	17.5	20.7	65.9	2.9	0.2	7.8	2.5
6081604800	13.15	20.52	20-25%	5059 San Mateo	10.8	73.2	16	13.1	37.8	0.8	0.1	44.5	3.8
6083002808	13.15	20.51	20-25%	6506 Santa Barbara	10.8	68.7	20.5	18.8	67.4	4	0.6	5.5	3.8
6085506605	13.15	20.49	20-25%	3941 Santa Clara	12.5	77.3	10.2	23.9	46.3	3.2	0.2	23	3.3
6089012500	13.14	20.48	20-25%	1477 Shasta	5.1	68.2	26.7	3.2	90.7	0.3	2.2	0.4	3.2
6065044932	13.14	20.47	20-25%	3067 Riverside	13.3	73.9	12.8	42.2	44.4	1.2	0.6	9	2.7
6073008341	13.14	20.46	20-25%	7614 San Diego	4	83.9	12.1	7	44.7	1.5	0	43.1	3.7
6073008339	13.14	20.44	20-25%	1853 San Diego	5.2	91.2	3.6	12.2	45.3	1.3	0.1	37.1	4
6073008502	13.13	20.43	20-25%	6241 San Diego	10.9	74.4	14.7	23.3	62.5	1.4	0.3	8.9	3.6
6073008344	13.13	20.42	20-25%	3462 San Diego	11.3	70.9	17.8	9.1	72.4	1.6	0.1	13.4	3.4
6001407700	13.11	20.41	20-25%	4109 Alameda	10.2	75.9	13.9	13.6	22.5	51	0.2	8.1	4.6
6037577100	13.11	20.39	20-25%	6700 Los Angeles	9.3	81.5	9.2	21.2	60.4	6.4	0.4	7.1	4.5
6059032013	13.11	20.38	20-25%	4984 Orange	10.1	67.3	22.6	16.1	71.5	2	0.1	5.9	4.5
6081602800	13.10	20.37	20-25%	4522 San Mateo	10.6	76.2	13.2	18.3	28.8	5.3	0.2	43.2	4.3
6037296401	13.09	20.36	20-25%	3191 Los Angeles	10.5	67.5	22	24.3	59.1	3.8	0.3	8.2	4.2
6085506603	13.09	20.34	20-25%	4070 Santa Clara	13.5	73	13.5	11.9	59.6	0.5	0.2	23.7	4.1
6055200705	13.08	20.33	20-25%	2776 Napa	14.5	72.9	12.6	39.7	55.6	0.4	0.5	1.8	2
6065044518	13.08	20.32	20-25%	5232 Riverside	13.7	71.8	14.5	36	52	6	0.6	2.8	2.8
6001451701	13.08	20.31	20-25%	3102 Alameda	12.5	73.5	14	19.5	67.8	1.3	0.4	6.5	4.4
6059099504	13.07	20.29	20-25%	2746 Orange	12.1	68.5	19.4	9.4	81.6	0.1	0.3	5.7	2.9
6049000200	13.07	20.28	20-25%	1910 Modoc	12.3	69.8	17.9	22.1	73.1	0.2	2	0.5	2.2
6055200504	13.07	20.27	20-25%	6431 Napa	14.1	72	13.9	47.9	47.1	0.6	0.4	2.6	1.4
6087121401	13.06	20.25	20-25%	2683 Santa Cruz	11	73	16	25.6	64	0.9	0.4	5.3	3.8
6081608400	13.06	20.24	20-25%	5546 San Mateo	12.7	77	10.3	32.8	31.5	3.3	0.1	28.6	3.7
6001422300	13.04	20.23	20-25%	3387 Alameda	8.9	78	13.1	9.2	60.9	5.5	0.1	18.9	5.5
6073019101	13.04	20.22	20-25%	7458 San Diego	15.9	74.8	9.3	36.2	41.6	1.3	14.5	3.8	2.7
6111008402	13.04	20.20	20-25%	5110 Ventura	12.2	75.9	11.9	15	74.8	0.9	0.3	6	3
6081602700	13.04	20.19	20-25%	5795 San Mateo	13.6	78.3	8.1	19.6	27.2	4.8	0.2	43	5.2
6071011102	13.03	20.18	20-25%	2031 San Bernardino	11.1	78.3	10.6	12.9	80.6	0.2	1.1	1.4	3.7
6037920044	13.03	20.17	20-25%	2686 Los Angeles	12.1	81	6.9	24.2	60.9	2.3	0.1	9	3.4
6071009108	13.03	20.15	20-25%	6825 San Bernardino	13.2	77.3	9.5	33.3	59.1	2.2	0.5	2.2	2.8
6085502901	13.03	20.14	20-25%	5919 Santa Clara	14.4	72.1	13.5	20	58.4	2.1	0.2	15	4.2
6023010200	13.03	20.13	20-25%	2983 Humboldt	9.4	72.5	18.1	4.9	83.8	0.4	6	1.1	3.8
6007001400	13.03	20.12	20-25%	5797 Butte	10.6	75.7	13.7	12.7	81.9	0.6	0.7	2.3	1.8
6075040200	13.03	20.10	20-25%	5191 San Francisco	9.5	75.7	14.8	7.5	48.9	0.8	0	38.3	4.5
6037134424	13.02	20.09	20-25%	2887 Los Angeles	8.9	79.4	11.7	6.7	71.5	1.7	0	16.5	3.6
6037403305	13.02	20.08	20-25%	2100 Los Angeles	9.5	81.7	8.8	13.9	15.1	1.5	0	68	1.4
6059021905	13.01	20.07	20-25%	5485 Orange	11	75.6	13.4	19.8	58.8	2.2	0.1	15.2	3.9
6071008708	13.01	20.05	20-25%	4352 San Bernardino	13	75.5	11.5	24.6	71.3	0.9	0.7	0.9	1.6
6059042327	13.00	20.04	20-25%	4814 Orange	10.2	78.1	11.7	12	71	1.4	0.2	10.6	4.7
6073021303	13.00	20.03	20-25%	8981 San Diego	13	76	11	28.9	54.2	2.3	0.3	11.3	2.9
6059063806	13.00	20.02	20-25%	3790 Orange	12.8	69.5	17.7	19.4	71.4	0.5	0.2	5.6	2.9
6085512305	12.99	20.00	20-25%	3936 Santa Clara	12.4	76.6	11	23.8	57.4	1.4	0.4	13.7	3.3
6095252108	12.98	19.99	15-20%	3165 Solano	11.4	76.9	11.7	14.1	65.7	6.4	0.3	8.8	4.6
6001450102	12.98	19.98	15-20%	9434 Alameda	8.8	86.4	4.8	21.5	25.9	28.6	0.9	20.5	2.6
6093001100	12.97	19.96	15-20%	2175 Siskiyou	10.8	71.3	17.9	10.6	80.9	2.1	1	0.8	4.6
6085512023	12.97	19.95	15-20%	5418 Santa Clara	17	77.7	5.3	47	24.6	6	0.5	18.6	3.2
6073009102	12.97	19.94	15-20%	3537 San Diego	8.4	80.4	11.2	24.3	58.9	3.3	0.3	8.8	4.3
6079010901	12.95	19.93	15-20%	8319 San Luis Obispo	0.3	99.5	0.2	11.7	70.8	0.9	0.2	11.4	5
6037276604	12.95	19.91	15-20%	3983 Los Angeles	6.2	82.7	11.1	14.8	56.5	9.4	0.1	14.1	5.1
6111000903	12.95	19.90	15-20%	5865 Ventura	10.4	74.1	15.5	19.8	75.3	0.5	0.3	2	2
6111003010	12.94	19.89	15-20%	2885 Ventura	17.7	75.2	7.1	65.9	20.6	4.4	0.1	7	2
6073021400	12.94	19.88	15-20%	7225 San Diego	15.2	75.4	9.4	16.9	68	4.9	0.4	5.5	4.2
6097151301	12.94	19.86	15-20%	4587 Sonoma	12.2	80.9	6.9	32	57.7	2.6	0.7	3.4	3.6
6083001601	12.93	19.85	15-20%	5270 Santa Barbara	11.5	74.4	14.1	45.9	48.1	0.6	0.3	3.3	1.7
6001441521	12.93	19.84	15-20%	5869 Alameda	16.4	72	11.6	6	17.9	3.2	0.1	66.4	6.4
6041101200	12.93	19.83	15-20%	2682 Marin	10.7	73.6	15.7	18.2	72	0.7	0.3	6	2.7
6061021801	12.90	19.81	15-20%	4522 Placer	8.7	70.6	20.7	6.7	89.8	0.5	0.6	0.8	1.5
6109002200	12.90	19.80	15-20%	8132 Tuolumne	9.5	68.8	21.7	8.2	87	0.3	1	1.2	2.4
6059042106	12.90	19.79	15-20%	1377 Orange	7	63.6	29.4	5.4	89.2	0.3	0.8	1.8	2.5
6067008508	12.89	19.78	15-20%	6825 Sacramento	18.1	75.6	6.3	8.8	62.5	1.4	0.2	23.7	3.4
6001407900	12.89	19.76	15-20%	2706 Alameda	11.7	75.8	12.5	13.1	39.2	22.7	0.3	17.8	6.9
6013337100	12.87	19.75	15-20%	3200 Contra Costa	10.3	74.4	15.3	17.5	61.9	2	0.2	14.2	4.2
6079012503	12.87	19.74	15-20%	5240 San Luis Obispo	14.4	72.8	12.8	20.8	70.2	1.6	0.5	4.2	2.7
6079011501	12.86	19.73	15-20%	1783 San Luis Obispo	8.5	76	15.5	17.2	73.4	1.5	1.1	4.3	2.6
6039000109	12.85	19.71	15-20%	2392 Madera	8.5	70.5	21	11	80.4	1.4	1.8	1	4.5
6001443102	12.84	19.70	15-20%	4611 Alameda	14.2	75.2	10.6	4.2	21.2	0.5	0.2	70.9	3
6055200400	12.84	19.69	15-20%	3618 Napa	11.1	71.6	17.3	18.2	76.5	0.5	0.5	2.1	2.3
6013320003	12.83	19.67	15-20%	2805 Contra Costa	13	80.5	6.5	11.7	65.7	2.2	0.7	13.3	6.4
6081604500	12.83	19.66	15-20%	3402 San Mateo	10.6	65.4	24	10.6	50.4	0.6	0	35.5	2.9
6037577200	12.83	19.65	15-20%	5414 Los Angeles	5.8	83.5	10.7	17.5	68.6	3.9	0.4	6.4	3.3
6105000102	12.82	19.64	15-20%	4558 Trinity	10.2	69.9	19.9	7.5	84.2	0.6	2.9	1.2	3.6
6097152203	12.82	19.62	15-20%	3527 Sonoma	9	74	17	11.8	80.3	1.8	0.5	2.5	3.1
6087120200	12.81	19.61	15-20%	4283 Santa Cruz	8.6	79.3	12.1	14	79.9	0.7	0.5	1.9	3.1
6059063400	12.80	19.60	15-20%	4795 Orange	10.4	73.2	16.4	5.6	88.8	0.5	0.1	3	2
6067008206	12.79	19.59	15-20%	5638 Sacramento	12.2	78	9.8	12.2	79.3	1.2	0.8	3.6	2.9
6085503330	12.78	19.57	15-20%	7618 Santa Clara	19.7	73.7	6.6	7.5	10.1	1.7	0.1	77.2	3.3
6037480600	12.77	19.56	15-20%	7863 Los Angeles	12.3	77	10.7	18.9	46.9	4.2	0.1	26.5	3.4
6001406800	12.77	19.55	15-20%	3428 Alameda	13.1	74.4	12.5	11.1	39.6	15.1	0.3	29.4	4.5
6073008355	12.76	19.54	15-20%	3365 San Diego	13.7	76.4	9.9	10.1	26.5	4.6	0.2	53.2	5.4
6101050504	12.76	19.52	15-20%	7163 Sutter	13.4	74.4	12.2	19.7	42.8	1.4	0.9	31.5	3.7
6065044911	12.74	19.51	15-20%	4617 Riverside	9.5	70.1	20.4	24.6	67.3	2.4	0.4	3.3	2.1
6085506102	12.74	19.50	15-20%	3808 Santa Clara	11.7	72.1	16.2	11.7	47.6	2	0.1	34.7	4
6013360200	12.74	19.49	15-20%	4626 Contra Costa	11.7	73.3	15	21.4	39.2	16.3	0.4	17.2	5.5
6037192002	12.73	19.47	15-20%	2735 Los Angeles	8.1	80.3	11.6	7.9	80	2.4	0.2	5.8	3.7
6037430003	12.73	19.46	15-20%	4604 Los Angeles	10.6	74.2	15.2	27.5	43	5.7	0.2	19.3	4.3
6085507905	12.73	19.45	15-20%	5784 Santa Clara	11.2	79.1	9.7	4.4	20.5	0.6	0.1	71.9	2.5
6037574000	12.72	19.43	15-20%	5277 Los Angeles	11.7	72.2	16.1	18.6	67.4	2.4	0.2	7.5	3.8
6087100700	12.71	19.42	15-20%	2632 Santa Cruz	4	88.6	7.4	16.9	68.5	3.2	1.6	5.2	4.7
6103000200	12.70	19.41	15-20%	7705 Tehama	12.9	70.5	16.6	7.8	86.1	0.2	2.3	0.8	2.8
6085505402	12.70	19.40	15-20%	3026 Santa Clara	13.8	73.5	12.7	24.8	37.4	1.6	0	32.3	3.8
6059052420	12.70	19.38	15-20%	21098 Orange	16.9	78.3	4.8	8	36.6	1.3	0	49.6	4.4
6073017030	12.69	19.37	15-20%	17064 San Diego	18.1	72.9	9	8.8	54.5	2.3	0.2	29.3	5

6085511100	12.69	19.36	15-20%	5445 Santa Clara	13.8	67.6	18.6	2.9	63.7	0.7	0.1	28.4	4.2
6073008349	12.68	19.35	15-20%	3514 San Diego	11.1	77.5	11.4	16	29.8	4.4	0.2	44.7	4.9
6071002014	12.68	19.33	15-20%	4846 San Bernardino	9.4	79.5	11.1	25.8	62.5	3.7	0.2	5.5	2.3
6029002811	12.68	19.32	15-20%	3854 Kern	9.1	70.4	20.5	11.1	66	3.2	0.5	16.3	3
6073013418	12.68	19.31	15-20%	5998 San Diego	13.3	75.9	10.8	54.7	24.8	3.6	0.1	14.3	2.6
6081605400	12.67	19.30	15-20%	6147 San Mateo	13.5	77	9.5	21.3	58.2	1.5	0.1	15.1	3.9
6001403702	12.67	19.28	15-20%	1724 Alameda	5.2	82.3	12.5	8.6	56.7	18.1	0.2	10	6.4
6037408722	12.66	19.27	15-20%	4400 Los Angeles	9.4	78.1	12.5	26.8	14	1	0.2	56.6	1.5
6073018612	12.65	19.26	15-20%	3331 San Diego	13.1	77.2	9.7	36.3	46.2	6.1	0.5	7.1	3.8
6085508204	12.62	19.25	15-20%	4194 Santa Clara	19.8	68.5	11.7	8.8	33.7	1.2	0.1	53	3.1
6001430700	12.62	19.23	15-20%	3814 Alameda	12.6	74.3	13.1	16.8	56.9	2.6	0.4	17.8	5.4
6089011600	12.62	19.22	15-20%	3877 Shasta	10.7	73	16.3	8.4	79.2	0.5	3.8	4.4	3.7
6075042601	12.61	19.21	15-20%	3687 San Francisco	9.1	76.1	14.8	7.6	46.9	1.2	0.2	39.5	4.6
6037480012	12.61	19.20	15-20%	4763 Los Angeles	11.3	76.6	12.1	17.7	22.5	1.2	0.1	56.1	2.4
6037901205	12.61	19.18	15-20%	10466 Los Angeles	13.4	75.2	11.4	23.8	54.8	11.1	0.4	6.8	3
6067008504	12.60	19.17	15-20%	4320 Sacramento	13.9	79.6	6.5	8.7	70.2	2	0.5	15.7	2.8
6059021924	12.59	19.16	15-20%	4192 Orange	14	79.9	6.1	14.8	52.1	1.9	0.1	27	4
6061023800	12.56	19.14	15-20%	3257 Placer	0.6	32.7	66.7	5.1	89.4	1.1	0.2	3.4	0.8
6113010509	12.56	19.13	15-20%	3471 Yolo	7.3	80.1	12.6	12.8	59.5	2	0.2	21.8	3.7
6079012900	12.56	19.12	15-20%	5296 San Luis Obispo	12.6	74.9	12.5	17	77.3	0.5	0.9	1.8	2.5
6075042700	12.56	19.11	15-20%	5326 San Francisco	8.2	74.6	17.2	6.5	43.9	1.4	0.2	44.4	3.6
6059110203	12.55	19.09	15-20%	5393 Orange	11.2	78	10.8	25.1	48.9	1.8	0.3	20.2	3.7
6059099240	12.55	19.08	15-20%	5183 Orange	9.9	76.7	13.4	10.7	75.5	0.8	0.2	8.5	4.1
6059099246	12.55	19.07	15-20%	3614 Orange	9.6	73.7	16.7	10	67	0.7	0.3	18.8	3.2
6061020107	12.54	19.06	15-20%	3510 Placer	15.6	79.1	5.3	59.6	39	0.1	0.4	0.3	0.6
6005000101	12.54	19.04	15-20%	3907 Amador	7	62.4	30.6	4.9	90.2	0.3	1.5	0.8	2.3
6023010902	12.52	19.03	15-20%	4143 Humboldt	11.1	75.1	13.8	7.6	83.5	0.1	4.7	0.6	3.4
6059032011	12.52	19.02	15-20%	1606 Orange	5.8	85.2	9	7.4	86.9	0.2	0.6	1.8	3.1
6075033100	12.52	19.01	15-20%	3968 San Francisco	10.4	70	19.6	5.5	37.3	0.5	0.1	53.8	2.8
6073006801	12.51	18.99	15-20%	2503 San Diego	6.6	81.3	12.1	12.6	72	6.7	0.7	4.2	3.8
6097153806	12.51	18.98	15-20%	3288 Sonoma	12.5	72	15.5	26.8	65.6	1	0.9	3.2	2.5
6085507903	12.50	18.97	15-20%	4828 Santa Clara	10.4	74.8	14.8	2.1	23.5	0.4	0	71.7	2.3
6071010420	12.50	18.96	15-20%	4103 San Bernardino	13.3	71.8	14.9	17	74.1	2.7	1	1.4	3.9
6073015302	12.50	18.94	15-20%	4075 San Diego	9.2	66.3	24.5	16.3	72.9	2.6	0.3	4.2	3.7
6057000402	12.49	18.93	15-20%	6926 Nevada	8.9	73.2	17.9	7.3	86.3	0.3	1.3	1.4	3.3
6013343001	12.49	18.92	15-20%	4806 Contra Costa	10.2	75.4	14.4	14.6	73.1	1.1	0.1	7.4	3.8
6037910804	12.49	18.91	15-20%	3295 Los Angeles	10.2	80.7	9.1	20.2	74.1	0.5	0.5	2.6	2
6013345111	12.48	18.89	15-20%	5099 Contra Costa	13.6	79.1	7.3	9.4	48.1	2.6	0.4	36.6	3
6073018513	12.47	18.88	15-20%	9081 San Diego	14.8	76.4	8.8	23.5	54.4	5.9	0.2	10.8	5.1
6001450200	12.47	18.87	15-20%	4067 Alameda	11.3	84	4.7	15	55.4	4.6	0	20	4.8
6001441522	12.47	18.85	15-20%	4980 Alameda	13.3	75.3	11.4	13.9	17.8	5	0.1	58.1	5.1
6007001900	12.44	18.84	15-20%	3373 Butte	8.2	63.2	28.6	6	89.6	0.3	1	1.2	2
6059063302	12.44	18.83	15-20%	4165 Orange	13.3	76.5	10.2	10.8	83.2	0.6	0.1	2.5	2.8
6037800410	12.43	18.82	15-20%	3627 Los Angeles	4.2	90.2	5.6	9.3	73.2	4.3	0.2	8.9	4.1
6111006700	12.43	18.80	15-20%	3117 Ventura	10.4	69.9	19.7	11	77.5	1.2	0.1	7	3.2
6037621301	12.43	18.79	15-20%	6769 Los Angeles	10.9	77.3	11.8	12.8	67.7	2.3	0.1	12.5	4.7
6061022500	12.43	18.78	15-20%	3879 Placer	14.9	75.9	9.2	10.3	65	4.7	0.6	15.3	4.2
6059021914	12.43	18.77	15-20%	4218 Orange	11.7	76.1	12.2	38.8	50	0.8	0.3	8.3	1.8
6037464000	12.43	18.75	15-20%	5621 Los Angeles	9.8	74.3	15.9	14.5	59.3	3	0.2	19.9	3.1
6059099239	12.41	18.74	15-20%	3924 Orange	11	72.2	16.8	8.7	73.6	0.4	0.3	14.1	3
6077004104	12.40	18.73	15-20%	3265 San Joaquin	11.3	73.7	15	13	77.5	0.2	0.4	6.2	2.8
6001443105	12.40	18.72	15-20%	4456 Alameda	11.7	78.6	9.7	2.8	17	0.4	0	76.8	3.1
6037300701	12.40	18.70	15-20%	6144 Los Angeles	10.1	72.4	17.5	9.4	76.7	0.5	0	10.2	3.1
6111007513	12.40	18.69	15-20%	1681 Ventura	9.9	75	15.1	11.2	81.9	0.8	0.4	3.2	2.4
6009000501	12.39	18.68	15-20%	3332 Calaveras	7.8	64.5	27.7	6.2	90.1	0.3	0.3	0.9	2.1
6073017304	12.39	18.67	15-20%	5508 San Diego	9.4	75.6	15	27.3	66.8	0.4	0.2	3.4	1.9
6085504423	12.38	18.65	15-20%	2373 Santa Clara	11.7	78.6	9.7	20.9	26.1	1.1	0.3	49.1	2.4
6085508102	12.38	18.64	15-20%	3321 Santa Clara	17.4	72.5	10.1	4.3	29.3	0.8	0	62.2	3.4
6067007103	12.38	18.63	15-20%	3850 Sacramento	13.6	83.8	2.6	19	33.9	13.4	0.2	28.1	5.5
6089012604	12.38	18.62	15-20%	2198 Shasta	7.7	69.8	22.5	5.2	86.7	0.4	2.1	1.1	4.5
6037269000	12.37	18.60	15-20%	5138 Los Angeles	10.4	67.6	22	8.4	77.1	3.1	0.2	7.7	3.4
6067009326	12.37	18.59	15-20%	4804 Sacramento	14.2	77.6	8.2	13.6	43.9	7.3	0.3	30.1	4.8
6073009107	12.36	18.58	15-20%	3688 San Diego	6.8	83.2	10	20	63.8	3.2	0.4	7.8	4.9
6059042335	12.35	18.56	15-20%	5829 Orange	14.3	78.9	6.8	15	63.3	1.3	0.1	15.4	5
6083002012	12.35	18.55	15-20%	3036 Santa Barbara	12.3	69.4	18.3	20	71.5	1.4	0.5	3.7	2.8
6073008340	12.33	18.54	15-20%	8988 San Diego	8.5	84.9	6.6	10.5	47.4	1.8	0.1	36.3	3.8
6111005504	12.33	18.53	15-20%	4320 Ventura	11.7	70	18.3	24.4	63.5	1.4	0.2	6.9	3.6
6001443104	12.33	18.51	15-20%	5558 Alameda	13.4	77.4	9.2	5.3	20.5	1.1	0.1	69.7	3.3
6081607200	12.33	18.50	15-20%	4197 San Mateo	10.6	76.4	13	25.3	45.1	2.3	0.1	23.3	3.8
6085508505	12.33	18.49	15-20%	4392 Santa Clara	12.1	73.6	14.3	8.9	41	1.7	0.1	43.8	4.4
6085512024	12.32	18.48	15-20%	4670 Santa Clara	14.5	75	10.5	23.2	43.2	8.9	0.3	18.6	5.8
6013361000	12.32	18.46	15-20%	4475 Contra Costa	11	75.9	13.1	20.6	36.6	14.8	0.7	21.9	5.4
6111006800	12.32	18.45	15-20%	3908 Ventura	10.9	76.5	12.6	28.4	64.6	0.7	0.5	3.2	2.6
6033001300	12.32	18.44	15-20%	7575 Lake	11.8	74.7	13.5	15.7	77.6	1	1.4	1.5	2.9
6075016600	12.32	18.43	15-20%	5069 San Francisco	4.7	89.6	5.7	8.8	73	4	0.2	9.3	4.7
6001422500	12.32	18.41	15-20%	4658 Alameda	2.6	91.8	5.6	6.9	57.8	2.1	0.1	27.8	5.2
6037620501	12.30	18.40	15-20%	5390 Los Angeles	13	77.4	9.6	14.1	66.4	2.3	0.1	12.3	4.8
6037620602	12.30	18.39	15-20%	5376 Los Angeles	12.1	76.9	11	20.2	61.5	2.1	0.3	12.1	3.9
6095252105	12.29	18.38	15-20%	3256 Solano	10.2	78.4	11.4	10.6	64.7	4.1	0.3	14.9	5.4
6073007800	12.29	18.36	15-20%	5724 San Diego	13.7	81.6	4.7	25.9	62.2	3.2	0.3	4.4	4.1
6037262706	12.29	18.35	15-20%	3563 Los Angeles	14.5	67.2	18.3	4.8	87.3	0.6	0.1	4.1	3.1
6065940500	12.28	18.34	15-20%	2208 Riverside	2.5	59.8	37.7	5.8	88.5	1.2	0.9	1.9	1.7
6073019107	12.28	18.33	15-20%	2104 San Diego	11.8	67.9	20.3	24.3	61	0.3	11.4	1.1	1.9
6001443103	12.28	18.31	15-20%	4029 Alameda	8.9	80.4	10.7	2.4	13	0.8	0	81.5	2.2
6013333102	12.28	18.30	15-20%	3855 Contra Costa	10	78	12	17.7	62.4	2.7	0.1	12.8	4.3
6079010703	12.28	18.29	15-20%	3487 San Luis Obispo	11.4	75.6	13	19.8	68.3	0.6	0.4	8.9	2
6009000400	12.27	18.27	15-20%	4032 Calaveras	6.9	68.5	24.6	6.7	86.2	0.2	3.2	0.9	2.9
6097150607	12.27	18.26	15-20%	5369 Sonoma	14.8	76.6	8.6	14.1	71.6	1.2	0.3	9.6	3.2
6037139801	12.26	18.25	15-20%	3539 Los Angeles	10.4	65.6	24	3.6	87.6	1.3	0	4.2	3.4
6067008207	12.25	18.24	15-20%	4212 Sacramento	10.4	76.4	13.2	9.4	82.9	1.1	0.4	2.4	3.7
6065940900	12.25	18.22	15-20%	1916 Riverside	2.7	47.6	49.7	10.3	84.6	1.7	0.5	2	0.8
6085503003	12.24	18.21	15-20%	5099 Santa Clara	13	73.3	13.7	21.2	61.2	0.8	0.4	12.5	3.9
6097150303	12.24	18.20	15-20%	4170 Sonoma	5.7	53.9	40.4	9.3	86.3	0.2	0.2	2.3	1.8
6065045606	12.24	18.19	15-20%	2680 Riverside	11	70.7	18.3	43.9	51.9	0.7	0.5	2.2	0.8
6093000703	12.24	18.17	15-20%	3362 Siskiyou	12.5	69.1	18.4	8.3	82.2	0.7	3.2	1.4	4.3
6065047900	12.23	18.16	15-20%	11611 Riverside	14.9	79.1	6	25.6	52	6.3	0.2	12.6	3.3
6059063905	12.22	18.15	15-20%	4375 Orange	10.6	75.4	14	20.3	67.8	1.1	0.2	7.6	3
6079010205	12.22	18.14	15-20%	4159 San Luis Obispo	14	77.1	8.9	35.2	58.7	1.3	0.9	1.7	2.1
6065043252	12.21	18.12	15-20%	6574 Riverside	18	75.9	6.1	19.5	53.4	4.3	1.7	16.3	4.7
6089012303	12.21	18.11	15-20%	3913 Shasta	10.9	74.8	14.3	8.2	85	0.4	2	1.3	3.1
6093001000	12.21	18.10	15-20%	6991 Siskiyou	8.5	70.9	20.6	7	86.2	1.1	0.6	1.8	3.3
6067009630	12.19	18.09	15-20%	9389 Sacramento	19	75.5	5.5	19.2	24.7	12.8	0.2	36.5	6.6
6111007509	12.19	18.07	15-20%	4161 Ventura	13.7	78	8.3	10	71.1	1.4	0.1	14	3.4
6001408100	12.19	18.06	15-20%	5991 Alameda	9.4	73.8	16.8	7.7	36.1	30.5	0.1	20.2	5.4
6061022400	12.19	18.05	15-20%	4396 Placer	17.6	71.6	10.8	8.2	72.2	1.8	0.4	13.4	4
6085506000	12.19	18.04	15-20%	4617 Santa Clara	13.6	74.8	11.6	19.1	49.6	2	0.2	25.2	4
6037431600	12.18	18.02	15-20%	4018 Los Angeles	8.8	71.4	19.8	9.7	21.7	0.5	0	66.2	1.9
6073008305	12.17	18.01	15-20%	10482 San Diego	2.8	96.7	0.5	11.1	41.5	2.6	0.1	39.7	5
6037577504	12.17	18.00	15-20%	1448 Los Angeles	5.1	76.9	18	10.7	81.3	1	0.3	3.7	2.9
6037430301	12.17	17.98	15-20%	4422 Los Angeles	9.8	73	17.2	16.4	71.9	1.4	0.2	7.3	2.7
6001441501	12.16	17.97	15-20%	6068 Alameda	14.4	77.1	8.5	6.7	13.2	4.7	0.2	68.1	7.1
6073017018	12.15	17.96	15-20%	3834 San Diego	11.9	76.8	11.3	13.5	43	3.9	0.2	34	5.4
6093000500	12.15	17.95	15-20%	2142 Siskiyou	8.9	72.4	18.7	6.7	69.3	0.4	17	0.7	5.9
6071010415	12.15	17.93	15-20%	5682 San Bernardino	15.9	76	8.1	18.7	57.5	9.7	0.9	7.8	5.4
6037920322	12.15	17.92	15-20%	2895 Los Angeles	11	70.8	18.2	24.4	65	2.1	0.1	6.3	2.1
6065044927	12.14	17.91	15-20%	3801 Riverside	7.4	52.6	40	16.9	75.7	2.5	0.2	3.2	1.4
6045011002	12.12	17.90	15-20%	5364 Mendocino	7.1	70.3	22.6	5.9	88.5	0.4	0.9	1.2	3.1
6067004004	12.11	17.88	15-20%	6086 Sacramento	9.4	70.9	19.7	11.9	43.2	9.8	0.5	30	4.5
6001451201	12.11	17.87	15-20%	6595 Alameda	14.4	77.9	7.7	18	64.4	2.6	0.5	10.4	4
6075032602	12.11	17.86	15-20%	4316 San Francisco	7	73.4	19.6	4.1	32.9	1.1	0	58.2	3.6
6081607900	12.09	17.85	15-20%	3182 San Mateo	9.2	74.9	15.9	10.7	54.1	1.8	0.2	28.7	4.5
6111008800	12.09	17.83	15-20%	5632 Ventura	15.9	75.1	9	73.5	17.1	3.4	0.3	4.1	1.6
6085508202	12.08	17.82	15-20%	7684 Santa Clara	15.8	71.1	13.1	12	41.9	1.2	0.2	41	3.7

6073016607	12.08	17.81	15-20%	6365 San Diego	11.8	76.2	12	15.2	76	0.8	0.3	4	3.6
6059099214	12.08	17.80	15-20%	3498 Orange	9.9	68.8	21.3	10.6	75.6	0.6	0.3	9.8	3.1
6059032051	12.07	17.78	15-20%	4580 Orange	13.4	79.9	6.7	31	55.4	2.1	0.2	7.9	3.3
6037651304	12.07	17.77	15-20%	5114 Los Angeles	9.1	74.2	16.7	10.2	77.4	1	0.2	7.5	3.8
6081614000	12.06	17.76	15-20%	5458 San Mateo	12.9	75.6	11.5	16.3	31.1	3.1	0.3	43.9	5.4
6019005522	12.06	17.74	15-20%	4467 Fresno	17.4	75.6	7	16.3	61.5	1.9	0.4	16.7	3.3
6075045200	12.05	17.73	15-20%	6474 San Francisco	9.3	76.2	14.5	6.1	43.1	1.4	0.2	44.5	4.6
6029006006	12.05	17.72	15-20%	3519 Kern	9.5	72	18.5	13.7	80.4	0.8	0.7	1.8	2.5
6085512047	12.05	17.71	15-20%	5461 Santa Clara	12.3	75.5	12.2	28.2	50.1	2.9	0.3	13.9	4.5
6073018608	12.05	17.69	15-20%	3175 San Diego	13.4	73.1	13.5	24.3	48.9	8.5	0.5	11.9	6
6037430502	12.04	17.68	15-20%	6745 Los Angeles	10.5	72	17.5	15.6	71.2	2	0.3	7.4	3.5
6059099311	12.04	17.67	15-20%	3598 Orange	7	84.9	8.1	11.5	78.5	0.6	0.4	6	3.1
6055201401	12.04	17.66	15-20%	3114 Napa	5.9	65.2	28.9	8.9	85.7	0.5	0.2	2.9	1.8
6095252908	12.04	17.64	15-20%	3626 Solano	13.9	79.1	7	24	56.4	7.9	0.4	4.8	6.4
6001400300	12.04	17.63	15-20%	4865 Alameda	11.1	78.8	10.1	8.2	66.9	10.5	0.2	8.7	5.5
6075035400	12.02	17.62	15-20%	6691 San Francisco	8.2	76.6	15.2	7.4	31.9	1.5	0.3	55.6	3.4
6035040600	12.02	17.61	15-20%	3781 Lassen	8.6	80.7	10.7	14	62.2	13.5	3.4	2.3	4.7
6023000900	12.01	17.59	15-20%	5074 Humboldt	8.7	76.4	14.9	5.1	86.2	0.9	1.4	2.4	4
6113010402	12.01	17.58	15-20%	3832 Yolo	18.3	76.2	5.5	17.8	44.2	8.4	0.3	23.6	5.8
6055201007	12.01	17.57	15-20%	4089 Napa	13.3	77.6	9.1	32	26.1	7.1	0.3	29.7	4.8
6085506204	12.01	17.56	15-20%	6064 Santa Clara	14.3	73.2	12.5	13	36.7	1.5	0.2	45.5	3.2
6085513000	12.00	17.54	15-20%	8215 Santa Clara	4.3	95.6	0.1	11	43.4	4.7	0.5	33.6	6.8
6087121300	12.00	17.53	15-20%	4144 Santa Cruz	12.2	71.1	16.7	26.7	65.7	1.3	0.4	3.4	2.5
6037910808	12.00	17.52	15-20%	3537 Los Angeles	12.9	80.5	6.6	27.9	61.9	2	0.3	5.4	2.5
6081608200	11.99	17.51	15-20%	3614 San Mateo	12.4	71.8	15.8	8.7	44.2	1.7	0.1	40.7	4.6
6085502902	11.98	17.49	15-20%	7200 Santa Clara	14.1	71.2	14.7	17.6	65.3	1.3	0.2	10.8	4.7
6055202000	11.98	17.48	15-20%	5155 Napa	12.7	68.6	18.7	49.4	47.7	0.4	0.3	0.9	1.3
6059042113	11.97	17.47	15-20%	4364 Orange	7.8	67.6	24.6	10.6	82.8	0.4	0.7	3.2	2.3
6071000804	11.97	17.45	15-20%	3255 San Bernardino	9.7	73.3	17	18.2	70.1	1.6	0.2	8.1	2
6037480202	11.96	17.44	15-20%	2534 Los Angeles	14.2	68.8	17	24.3	33.1	0.5	0	39.5	2.6
6075031301	11.96	17.43	15-20%	3826 San Francisco	8.5	75.8	15.7	7.5	21.8	18	0.1	48.7	3.9
6059063101	11.95	17.42	15-20%	2733 Orange	10.1	81	8.9	19.6	66.9	1.8	0.5	8	3.3
6001450502	11.94	17.40	15-20%	4185 Alameda	12.1	77.3	10.6	10	60.3	3.2	0.2	21.2	5.2
6061023700	11.93	17.39	15-20%	3347 Placer	0	21	79	3.2	92.2	0.6	0.3	3	0.7
6019005912	11.93	17.38	15-20%	3280 Fresno	9.7	72.6	17.7	16.7	72	0.4	0.8	7.7	2.4
6089010803	11.90	17.37	15-20%	4908 Shasta	11.5	72.6	15.9	7.6	81.9	1	1.2	4.9	3.4
6097153809	11.90	17.35	15-20%	4336 Sonoma	12.8	73.5	13.7	28.8	63.1	0.7	1.4	3.1	3
6073008351	11.89	17.34	15-20%	4261 San Diego	10.5	79.1	10.4	13.9	28.6	4.4	0.3	48.1	4.7
6071008703	11.89	17.33	15-20%	7745 San Bernardino	8.7	75.5	15.8	15.4	78.2	1.5	0.5	2.3	2.2
6059011717	11.89	17.32	15-20%	2746 Orange	11.8	73.1	15.1	19.7	66.9	1.5	0.1	8.3	3.6
6089010805	11.88	17.30	15-20%	5006 Shasta	14.1	74	11.9	7.6	86	0.8	1.1	2	2.5
6037101122	11.88	17.29	15-20%	3664 Los Angeles	9.6	77	13.4	15.7	66.5	0.7	0.1	13.5	3.4
6041110100	11.86	17.28	15-20%	5849 Marin	8.5	73	18.5	16.5	71.8	2.1	0.1	6.2	3.3
6087121800	11.85	17.27	15-20%	4796 Santa Cruz	8.1	75.3	16.6	14.6	77.5	0.9	0.3	3.6	3.2
6073009602	11.85	17.25	15-20%	3775 San Diego	9.7	67.5	22.8	14.3	71.9	2.4	0.4	7.6	3.4
6079011101	11.85	17.24	15-20%	3592 San Luis Obispo	4.5	88	7.5	15.5	75.8	1.4	0.4	3.5	3.4
6083002922	11.85	17.23	15-20%	8839 Santa Barbara	4.4	95.1	0.5	22.4	50.8	3.1	0.2	18.7	4.8
6079010602	11.84	17.22	15-20%	3836 San Luis Obispo	7.6	67.1	25.3	14	80.2	0.4	0.7	2.6	2.1
6065042208	11.83	17.20	15-20%	2378 Riverside	9.3	69.8	20.9	17.4	71.6	3.5	0.2	4.8	2.5
6073013606	11.83	17.19	15-20%	6386 San Diego	11.9	74.1	14	16.7	65.6	6.1	0.2	6	5.3
6073000201	11.82	17.18	15-20%	1801 San Diego	8.1	70	21.9	10.1	81	1.6	0.5	4.4	2.4
6001450750	11.82	17.16	15-20%	3618 Alameda	15.5	75.6	8.9	11.5	40.8	7.8	0.2	33.1	6.6
6065045122	11.82	17.15	15-20%	1427 Riverside	2.4	39.6	58	4.3	90.3	1.1	1	1.8	1.5
6097153403	11.82	17.14	15-20%	3840 Sonoma	8.4	73.6	18	8.9	85.1	0.7	0.7	1.9	2.7
6075011902	11.81	17.13	15-20%	2598 San Francisco	3.3	87.7	9	12.2	54.5	2.1	0.3	27.4	3.5
6007000601	11.81	17.11	15-20%	3304 Butte	11.9	78	10.1	12.2	79.6	0.9	0.8	3.1	3.3
6089010704	11.81	17.10	15-20%	4362 Shasta	11.6	66.3	22.1	8.2	82.6	1	2.1	2	4
6085503325	11.81	17.09	15-20%	4448 Santa Clara	12.6	78.7	8.7	31	9.7	3	0.1	54.5	1.7
6037577300	11.80	17.08	15-20%	5547 Los Angeles	7.1	84.7	8.2	14.7	74.2	2.2	0.3	5.5	3.1
6013345202	11.80	17.06	15-20%	7816 Contra Costa	14	76.8	9.2	9.7	61.6	3.3	0.2	20.3	5
6113010513	11.80	17.05	15-20%	2817 Yolo	6.6	89.3	4.1	11.4	65.8	1.3	0.3	17.3	3.9
6059021923	11.79	17.04	15-20%	6643 Orange	13.7	78.3	8	14.6	57.1	2	0.2	22	4
6095252913	11.79	17.03	15-20%	4910 Solano	12.4	79.4	8.2	19.7	57.8	8.6	0.1	8.1	5.6
6017030804	11.79	17.01	15-20%	6377 El Dorado	10.2	72.3	17.5	8.9	84.2	0.6	2	1.5	2.9
6059062604	11.79	17.00	15-20%	15174 Orange	14.8	75.7	9.5	6.1	57.7	0.7	0.1	31.4	4
6073020405	11.78	16.99	15-20%	3412 San Diego	9.3	69.1	21.6	10.8	79.7	0.5	0.1	6.6	2.3
6085505500	11.77	16.98	15-20%	3911 Santa Clara	12.7	72.5	14.8	20.6	52.5	2.1	0.3	20.5	4
6013322000	11.77	16.96	15-20%	6085 Contra Costa	10.1	72.1	17.8	11.3	70.2	1.4	0.2	13	3.9
6059042311	11.77	16.95	15-20%	5996 Orange	9.9	69.9	20.2	18.9	74.5	0.4	0.4	3.8	2
6061022013	11.77	16.94	15-20%	2934 Placer	8.5	76.2	15.3	5.4	89.5	0.3	1.3	0.6	2.8
6065045120	11.77	16.93	15-20%	4580 Riverside	13.7	70.1	16.2	51.2	43.9	1.9	0.2	1.2	1.5
6085508001	11.77	16.91	15-20%	7377 Santa Clara	16.7	70.2	13.1	3.5	28.9	0.6	0.1	63.4	3.6
6085508401	11.76	16.90	15-20%	6834 Santa Clara	17.2	68.2	14.6	8.2	47	1.1	0.1	38.9	4.8
6083003005	11.76	16.89	15-20%	4999 Santa Barbara	11.8	75.7	12.5	41.8	48.4	1.3	0.3	5.7	2.5
6075010200	11.75	16.87	15-20%	4143 San Francisco	4.7	77.9	17.4	5.1	81.1	0.6	0.1	10.2	3
6059062649	11.75	16.86	15-20%	3257 Orange	3.4	44.5	52.1	9.2	80.5	1.2	0.1	7.6	1.4
6071011204	11.74	16.85	15-20%	1271 San Bernardino	7.8	70	22.2	14.9	80.9	0.5	0.2	1.6	2
6001450501	11.74	16.84	15-20%	3129 Alameda	11.4	75.5	13.1	11.9	64.9	3	0.3	14.8	5.1
6111005911	11.74	16.82	15-20%	3854 Ventura	10.7	73.7	15.6	11.3	77.4	1.4	0.2	6.7	3.1
6017030704	11.73	16.81	15-20%	5961 El Dorado	14.5	71.3	14.2	11.3	73.4	1.3	0.5	9.9	3.7
6097153704	11.72	16.80	15-20%	3728 Sonoma	7.7	78.6	13.7	12.8	80.3	0.8	1	1.2	4
6001404102	11.72	16.79	15-20%	2283 Alameda	3.2	65.9	30.9	6.5	67.5	8	0.2	13.4	4.4
6001403800	11.72	16.77	15-20%	3461 Alameda	8.4	81.7	9.9	8.4	62.9	9.7	0.2	13.5	5.4
6073013505	11.72	16.76	15-20%	4725 San Diego	11.5	77	11.5	24	55.2	11	0.5	4.6	4.8
6085503323	11.71	16.75	15-20%	4688 Santa Clara	13.6	76.6	9.8	32.2	12.4	3.6	0	49.3	2.5
6111005401	11.70	16.74	15-20%	4073 Ventura	11.4	73.8	14.8	25.8	63.9	1.4	0.2	6.1	2.7
6037701501	11.69	16.72	15-20%	4986 Los Angeles	8.3	77.6	14.1	7.5	78	2.5	0.2	8.2	3.6
6001441925	11.69	16.71	15-20%	6159 Alameda	13.9	81.4	4.7	8.3	21.7	4.4	0.2	59.1	6.2
6037910209	11.68	16.70	15-20%	4397 Los Angeles	12.5	80.1	7.4	29.5	48.3	11.3	0.5	7.4	3.1
6037269500	11.68	16.69	15-20%	4043 Los Angeles	18	67.3	14.7	3.9	86.3	1.5	0	5.6	2.7
6027000100	11.68	16.67	15-20%	2757 Inyo	11.1	65.5	23.4	18.6	77.2	0.1	1	1.7	1.3
6037621324	11.68	16.66	15-20%	3842 Los Angeles	6.1	81	12.9	11.5	71.2	2.8	0.2	10.5	3.8
6067005702	11.67	16.65	15-20%	4795 Sacramento	12.4	70	17.6	6.4	85.1	1	0.3	4.2	3
6073021202	11.66	16.64	15-20%	3156 San Diego	10.2	77.9	11.9	17.5	68	1.2	9.1	1.7	2.5
6075047701	11.65	16.62	15-20%	4334 San Francisco	6.5	76.4	17.1	6.8	36.9	1.9	0.2	50.1	4.1
6087121700	11.65	16.61	15-20%	7458 Santa Cruz	11.6	76.3	12.1	25.9	63.6	1.4	0.3	5.4	3.3
6085512001	11.65	16.60	15-20%	6774 Santa Clara	17.2	76.4	6.4	23.4	27.5	3.4	0.3	42.2	3.2
6001442200	11.65	16.58	15-20%	6875 Alameda	12.3	74.1	13.6	6.1	26.2	1.4	0.1	63.6	2.6
6113010607	11.65	16.57	15-20%	4095 Yolo	12.3	75.2	12.5	11.4	66.6	2.3	0.3	15	4.5
6053014105	11.63	16.56	15-20%	2688 Monterey	10.6	86.8	2.6	22.4	50.5	8.9	0.7	9.7	7.7
6093001200	11.62	16.55	15-20%	1409 Siskiyou	7.8	65.5	26.7	6.2	89.4	0.6	1.1	0.4	2.3
6059099408	11.62	16.53	15-20%	4332 Orange	13.6	72	14.4	13.4	70.8	0.8	0.2	11.6	3.2
6097153804	11.62	16.52	15-20%	3239 Sonoma	11.9	76.3	11.8	26.9	65.8	0.7	0.6	3.4	2.6
6073015501	11.62	16.51	15-20%	4955 San Diego	10.2	78	11.8	16.1	78.2	0.9	0.8	1.8	2.3
6075010900	11.62	16.50	15-20%	4320 San Francisco	3.6	80.1	16.3	6.2	67.6	0.9	0.1	22.1	3.2
6013335000	11.62	16.48	15-20%	3358 Contra Costa	11.7	76.4	11.9	26.8	59.7	2	0.4	7.3	3.9
6037264000	11.62	16.47	15-20%	3358 Los Angeles	12.3	65.1	22.6	4	87.2	0.6	0.1	4.4	3.6
6013334001	11.61	16.46	15-20%	3749 Contra Costa	12.3	73.1	14.6	20.4	61.3	2.9	0.5	9.4	5.5
6073020807	11.61	16.45	15-20%	2599 San Diego	9.2	75.8	15	18.3	77.9	0.3	0.8	0.9	1.8
6013333101	11.59	16.43	15-20%	4091 Contra Costa	11.4	75.7	12.9	20	61.2	2.4	0.5	11.3	4.5
6085509106	11.59	16.42	15-20%	4171 Santa Clara	13.1	77.1	9.8	26.1	34.3	2.3	0.2	34	3.1
6061021203	11.59	16.41	15-20%	6536 Placer	12.3	75.1	12.6	8.7	83.3	0.5	0.8	2.9	3.7
6073016613	11.59	16.40	15-20%	1860 San Diego	11.6	77.3	11.1	15.5	77.3	0.6	0.4	3.8	2.3
6061020200	11.58	16.38	15-20%	6146 Placer	9	73.9	17.1	6.3	88.5	0.4	1.4	0.8	2.6
6029005402	11.58	16.37	15-20%	5094 Kern	14.1	70.8	15.1	14.2	74.2	3.1	0.7	4.6	3.2
6067008204	11.58	16.36	15-20%	4495 Sacramento	11.5	72.1	16.4	11	82.7	0.8	0.4	2.2	2.9
6059062648	11.57	16.35	15-20%	2774 Orange	0.1	18.4	81.5	4.1	85.4	0.6	0.1	8.4	1.2
6061021130	11.57	16.33	15-20%	2641 Placer	9.3	80.2	10.5	10.6	73.4	2	0.3	9.7	4
6051000101	11.57	16.32	15-20%	3463 Mono	10.8	77.1	12.1	13	80.5	0.1	2.3	1.4	2.7
6097151310	11.56	16.31	15-20%	6143 Sonoma	7.1	88.7	4.2	16.6	69.4	2.1	0.3	6.7	4.9
6059032003	11.56	16.29	15-20%	4852 Orange	9	75.4	15.6	14.5	75.6	0.4	0.2	6.6	2.7
6037141700	11.54	16.28	15-20%	3091 Los Angeles	12	71.2	16.8	5	83.2	2.3	0	5.8	3.6
6017030505	11.53	16.27	15-20%	2704 El Dorado	10.1	80.2	9.7	6.5	87.4	0.9	0.4	2.3	2.5

6017031302	11.53	16.26	15-20%	4701 El Dorado	10.9	71.3	17.8	12.5	82.6	0.1	1.3	0.9	2.6
6073016807	11.53	16.24	15-20%	7135 San Diego	11.8	76.5	11.7	18.6	75.2	1.6	0.5	1.7	2.3
6065043244	11.52	16.23	15-20%	7220 Riverside	14.4	71.4	14.2	25.6	53.1	5.4	0.4	11.7	3.8
6059021916	11.52	16.22	15-20%	3529 Orange	9	68.4	22.6	10.3	67.2	1.3	0.3	17.9	3
6073019803	11.52	16.21	15-20%	4465 San Diego	12.4	76.8	10.8	15.7	69.5	1.3	0.5	9	3.9
6073017701	11.52	16.19	15-20%	5275 San Diego	10.1	81.2	8.7	17.8	75.8	0.6	0.3	2.8	2.8
6037189400	11.52	16.18	15-20%	3448 Los Angeles	7.9	80.7	11.4	6.2	81.6	3.1	0.2	5	3.8
6013356002	11.51	16.17	15-20%	5375 Contra Costa	9.8	76.9	13.3	14.2	35.9	14.1	0.1	31.3	4.5
6065044520	11.50	16.16	15-20%	1704 Riverside	7.9	58.2	33.9	31.9	63.2	0.8	0.5	1.6	2
6059099235	11.50	16.14	15-20%	4619 Orange	10	74.5	15.5	16	69.2	0.9	0.3	10	3.6
6081608502	11.49	16.13	15-20%	2637 San Mateo	9.8	78.6	11.6	19	45.8	1.9	0.1	29.1	4.1
6001421900	11.48	16.12	15-20%	3632 Alameda	10.7	76.3	13	9.1	63.1	8	0.1	13.8	5.8
6017031402	11.48	16.11	15-20%	5896 El Dorado	7.8	75	17.2	8	85.5	0.4	1.2	1.2	3.8
6073008513	11.46	16.09	15-20%	2691 San Diego	10.1	72.8	17.1	11.4	75.4	1.5	0.4	8	3.3
6073008348	11.46	16.08	15-20%	5259 San Diego	11.3	80.3	8.4	12.4	29.5	2.4	0.3	49.6	5.7
6111005907	11.46	16.07	15-20%	3635 Ventura	6.4	59.1	34.5	5.5	86.5	0.6	0.2	4.3	2.9
6059099416	11.46	16.05	15-20%	4444 Orange	9.2	85.4	5.4	17	68.9	1	0.3	8	4.7
6033001100	11.46	16.04	15-20%	3865 Lake	8.1	76.5	15.4	7.1	86.8	0.6	1.4	0.9	3.2
6037920018	11.46	16.03	15-20%	2277 Los Angeles	12.4	80.7	6.9	18.4	71	1.3	0.2	6.5	2.7
6037463800	11.45	16.02	15-20%	3869 Los Angeles	10.6	68.4	21	13.6	67	3.3	0.2	12.7	3.2
6075032802	11.44	16.00	15-20%	4047 San Francisco	8	75.5	16.5	3.9	28.6	0.7	0.1	64.3	2.4
6017031404	11.44	15.99	15-20%	2407 El Dorado	8.9	73.9	17.2	6.6	89.1	0.3	1.2	0.8	1.9
6073020304	11.43	15.98	15-20%	6061 San Diego	11.1	69.2	19.7	17.9	71.6	1.1	0.3	6.5	2.6
6113011203	11.42	15.97	15-20%	2561 Yolo	10.6	71.7	17.7	22.6	71.1	0.5	0.8	3.2	1.7
6071000813	11.42	15.95	15-20%	3449 San Bernardino	9.3	77	13.7	19.8	60.7	3.4	0.2	13.6	2.3
6013355111	11.42	15.94	15-20%	6343 Contra Costa	14.2	80.2	5.6	27.8	30	21	0.5	16.1	4.6
6097152906	11.41	15.93	15-20%	5234 Sonoma	13.2	76.4	10.4	19.5	67.8	2.5	1	6.1	3.1
6089011703	11.40	15.92	15-20%	3282 Shasta	13	71.9	15.1	9.3	82.1	0.5	3.3	1.7	3.1
6013388000	11.37	15.90	15-20%	2576 Contra Costa	11.7	74.4	13.9	12	47.8	5.4	0.2	27.4	7.1
6085506606	11.37	15.89	15-20%	4453 Santa Clara	13.9	74.1	12	21.1	46.9	3.5	0.3	23.6	4.5
6083001903	11.36	15.88	15-20%	5764 Santa Barbara	10	69.5	20.5	27.7	68.4	0.6	0.6	1.3	1.5
6065045117	11.35	15.87	15-20%	3969 Riverside	7.1	68	24.9	19	75.4	1.3	0.4	2.6	1.4
6003010000	11.34	15.85	15-20%	1175 Alpine	12.8	73.1	14.1	7.1	72.5	0	17.9	0.6	1.9
6083000600	11.34	15.84	15-20%	4629 Santa Barbara	7	73	20	20.3	72.8	0.9	0.3	3.2	2.5
6081610000	11.34	15.83	15-20%	4531 San Mateo	12	76.3	11.7	24	63	1.8	0.1	7.9	3.2
6059032047	11.34	15.82	15-20%	3652 Orange	12.3	82.6	5.1	20.4	63.4	3.3	0.7	8.2	4.1
6075015700	11.34	15.80	15-20%	7832 San Francisco	5.2	85.9	8.9	10.5	53	4.8	0.1	26.2	5.3
6085508507	11.33	15.79	15-20%	3066 Santa Clara	15	79.6	5.4	14.7	20.3	2.4	0.3	59.3	3
6037573601	11.33	15.78	15-20%	6114 Los Angeles	11.9	75.3	12.8	20.1	65.9	2.3	0.3	7.1	4.4
6059063500	11.33	15.76	15-20%	5775 Orange	4	83.1	12.9	8.5	84.6	0.8	0.2	3.8	2.1
6075020700	11.31	15.75	15-20%	5171 San Francisco	6.8	84.9	8.3	18.2	64.9	1.9	0.2	10.8	4
6085508404	11.31	15.74	15-20%	6023 Santa Clara	15.3	70.7	14	8.2	48.6	1.8	0.1	36.8	4.5
6075013400	11.29	15.73	15-20%	3599 San Francisco	8.5	79.8	11.7	5.1	79.4	1.5	0.1	10.3	3.6
6093000800	11.28	15.71	15-20%	3412 Siskiyou	10.4	69.1	20.5	5.3	81.7	0.3	5.9	0.7	6
6073001900	11.27	15.70	15-20%	2939 San Diego	7.4	80.5	12.1	16.6	74.1	2.9	0.3	3.3	2.7
6097153703	11.27	15.69	15-20%	3490 Sonoma	5.8	78.6	15.6	7.7	85.8	0.4	0.8	1.4	4
6061021109	11.26	15.68	15-20%	5012 Placer	12.8	74	13.2	8.3	78.3	1.7	0.5	7.8	3.4
6073013601	11.25	15.66	15-20%	5053 San Diego	11.2	72.5	16.3	20.8	63.2	7.4	0.4	3.8	4.4
6073009103	11.25	15.65	15-20%	3679 San Diego	9.5	71.8	18.7	11.7	78.6	1.4	0.1	4.9	3.4
6059099244	11.25	15.64	15-20%	3730 Orange	7	51.8	41.2	7.3	82.9	0.6	0.2	6.7	2.2
6085506701	11.24	15.63	15-20%	3954 Santa Clara	13.4	75.7	10.9	12.1	58.9	2.1	0.2	22.8	4
6079010503	11.23	15.61	15-20%	5339 San Luis Obispo	9.5	69.2	21.3	15.7	78.9	0.4	0.4	2.2	2.4
6085507807	11.23	15.60	15-20%	3219 Santa Clara	11.9	78.7	9.4	2.1	18.6	0.2	0.3	76	2.8
6085506101	11.23	15.59	15-20%	4615 Santa Clara	12.8	71	16.2	14.5	52.5	1.6	0.2	27	4.1
6055200706	11.23	15.58	15-20%	3283 Napa	10.8	75.8	13.4	22.1	70.7	0.8	0.7	3.2	2.6
6073020024	11.22	15.56	15-20%	4175 San Diego	9.3	70.5	20.2	36.4	55.4	1.6	0.4	4.6	1.7
6075035202	11.22	15.55	15-20%	4322 San Francisco	7.5	81.8	10.7	8.8	43.6	1.7	0.3	42.2	3.4
6073018802	11.22	15.54	15-20%	8122 San Diego	7.1	66.7	26.2	12.6	81.4	0.7	0.3	3	2
6055201700	11.21	15.53	15-20%	5373 Napa	7.2	79.2	13.6	17.8	68	2.9	0.4	7.5	3.4
6059021921	11.20	15.51	15-20%	4496 Orange	9.9	79.8	10.3	11.7	62.5	1.3	0.2	21.2	3
6075047702	11.20	15.50	15-20%	3824 San Francisco	8.7	74.1	17.2	4.8	38.2	1.6	0.2	51.4	3.7
6037194300	11.20	15.49	15-20%	3029 Los Angeles	9.2	74.5	16.3	5.3	85.9	2.1	0.1	3.9	2.7
6059052526	11.20	15.47	15-20%	4355 Orange	10	79.4	10.6	13.5	42.8	1.7	0.2	37.9	4
6085512031	11.16	15.46	15-20%	4406 Santa Clara	14.3	76.7	9	26.2	52.5	2	0.6	14.3	4.5
6037137302	11.16	15.45	15-20%	4338 Los Angeles	9.5	66.2	24.3	7.7	78.5	1.8	0	7.8	4.1
6041106002	11.16	15.44	15-20%	5625 Marin	10.3	71.5	18.2	20.3	66.5	2.6	0.3	7.2	3.1
6037620800	11.16	15.42	15-20%	7575 Los Angeles	12.2	74.7	13.1	8	69.7	1.1	0.2	15.6	5.5
6065043265	11.16	15.41	15-20%	6142 Riverside	19.8	75	5.2	19.8	64.9	2.2	0.6	8.1	4.5
6067008125	11.15	15.40	15-20%	5265 Sacramento	11	72	17	12.7	79.5	1.3	0.5	2.9	3
6083000200	11.12	15.39	15-20%	4299 Santa Barbara	8.7	66.2	25.1	22.1	69.8	1.2	0.2	4	2.7
6037620522	11.11	15.37	15-20%	4632 Los Angeles	13.9	77.7	8.4	15.9	60.6	3	0.3	15.2	5.1
6045011400	11.09	15.36	15-20%	4469 Mendocino	8.9	71.5	19.6	13.8	78.3	0.8	1.7	2.7	2.8
6037650501	11.09	15.35	15-20%	3063 Los Angeles	10.7	75.1	14.2	13.2	57.9	0.8	0.3	24.4	3.5
6073013411	11.09	15.34	15-20%	4999 San Diego	9.3	72.5	18.2	40.6	40.8	2.4	0.2	13.2	2.8
6085508304	11.08	15.32	15-20%	7957 Santa Clara	13.7	77.2	9.1	12.3	32.2	2.7	0.1	49.1	3.6
6013355110	11.08	15.31	15-20%	4197 Contra Costa	13.2	81.7	5.1	25.4	31	22.2	0.4	15.4	5.5
6081611000	11.08	15.30	15-20%	5707 San Mateo	13.1	75.2	11.7	33.5	52.8	1.5	0.2	8.2	3.8
6073009202	11.07	15.29	15-20%	4428 San Diego	10.4	75.9	13.7	15.6	63.3	4.3	0.4	12.4	4.1
6067004011	11.06	15.27	15-20%	3086 Sacramento	9.6	76.7	13.7	10.1	32.1	11.2	0.1	40.7	5.8
6085502500	11.05	15.26	15-20%	6187 Santa Clara	14.8	71.8	13.4	17.6	70.7	1.3	0.3	6.5	3.7
6059032035	11.05	15.25	15-20%	2373 Orange	7.3	71.9	20.8	8.9	80.4	1.1	0.1	6	3.4
6065043257	11.04	15.24	15-20%	7034 Riverside	17.2	74.2	8.6	19.1	56.1	3.6	3.8	12.9	4.6
6037800324	11.04	15.22	15-20%	6664 Los Angeles	11.9	76.9	11.2	7.6	79.3	1.4	0.2	8.8	2.8
6037570002	11.03	15.21	15-20%	2699 Los Angeles	13.2	77.1	9.7	30.3	48.6	5.4	0.5	10.6	4.6
6013307101	11.03	15.20	15-20%	4166 Contra Costa	11.7	73.6	14.7	28.2	52.6	9.8	0.5	5.9	3.1
6059062636	11.01	15.18	15-20%	3690 Orange	14.3	80.7	5	17.5	57.5	2.8	0.2	16.4	5.7
6073017034	11.00	15.17	15-20%	4747 San Diego	13.5	79	7.5	13	60	3.1	0.4	18.7	4.9
6073021205	11.00	15.16	15-20%	6801 San Diego	13.4	74.2	12.4	17.7	74.3	1.4	1.4	2.6	2.6
6037800325	10.97	15.15	15-20%	3407 Los Angeles	7.8	64	28.2	6.2	86.3	1.3	0.2	3.7	2.3
6007000401	10.97	15.13	15-20%	1771 Butte	16.8	76	7.2	19.9	71	1.7	1.4	3	3
6073017037	10.96	15.12	15-20%	5880 San Diego	11.7	79.9	8.4	11	53.9	2.3	0.1	27.5	5.2
6089011803	10.96	15.11	15-20%	2923 Shasta	8.1	71.9	20	6.6	86.3	0.4	3.1	0.5	3.1
6013338102	10.96	15.10	15-20%	3601 Contra Costa	12	72.6	15.4	15.9	65.2	1.5	0.3	11.8	5.3
6037577400	10.95	15.08	15-20%	3253 Los Angeles	7.9	80.4	11.7	13.9	76.4	1.9	0.2	4.9	2.8
6079011102	10.95	15.07	15-20%	5127 San Luis Obispo	7.6	83.2	9.2	15.7	76.8	0.9	0.5	3.3	2.7
6075015600	10.94	15.06	15-20%	2728 San Francisco	8.1	79.9	12	7.1	54.9	2.2	0.1	30	5.7
6001443322	10.94	15.05	15-20%	2985 Alameda	16.1	73.5	10.4	8.1	27.6	1.5	0.4	58.3	4.1
6075010400	10.94	15.03	15-20%	4545 San Francisco	5.4	79.2	15.4	5.3	63	1	0	27.9	2.8
6001400400	10.91	15.02	15-20%	3703 Alameda	11.4	79.1	9.5	9	65.5	12.1	0.1	7.5	5.9
6097150202	10.91	15.01	15-20%	5103 Sonoma	9.3	68	22.7	17.3	77.2	0.5	0.5	2.6	1.9
6073017014	10.91	15.00	10-15%	2416 San Diego	0.4	26.1	73.5	4.6	87.9	1.1	0.2	5.3	0.8
6017031301	10.91	14.98	10-15%	3408 El Dorado	9.4	68.7	21.9	10.4	85.3	0.2	0.7	1	2.4
6071002021	10.89	14.97	10-15%	5201 San Bernardino	11.4	81.4	7.2	27	50.8	7.7	0.2	11	3.3
6073008345	10.88	14.96	10-15%	3254 San Diego	7.9	65.1	27	10.3	73.6	1.6	0.1	11.7	2.6
6073017039	10.88	14.95	10-15%	6921 San Diego	14.7	76.4	8.9	9.1	54.9	1.7	0.1	30.1	4.1
6097151700	10.88	14.93	10-15%	6978 Sonoma	11.3	69.5	19.2	18	71.5	1.8	0.8	4.3	3.5
6073013905	10.86	14.92	10-15%	3676 San Diego	13.4	78.4	8.2	31.8	39.1	15.4	0.1	8.7	4.9
6055201300	10.85	14.91	10-15%	2933 Napa	4.5	46.8	48.7	9.9	84	1.2	0.6	1.6	2.6
6001423601	10.81	14.89	10-15%	2642 Alameda	7	81.2	11.8	7.7	69.3	3.2	0.2	14.5	5
6059075814	10.81	14.88	10-15%	3327 Orange	9.3	80.6	10.1	10.2	59.5	0.8	0.2	26.8	2.6
6085509302	10.80	14.87	10-15%	2978 Santa Clara	14.6	68.7	16.7	13	59.4	2	0.3	20.7	4.5
6037920303	10.79	14.86	10-15%	1446 Los Angeles	11	82	7	16.9	55.5	3.9	0.5	18.9	4.3
6059099404	10.79	14.84	10-15%	4505 Orange	11	73.4	15.6	10.5	75.3	1.2	0.4	8.4	4.2
6073017603	10.79	14.83	10-15%	2476 San Diego	10.4	78.5	11.1	22.1	72.1	0.5	0.3	2.4	2.6
6075032801	10.78	14.82	10-15%	4238 San Francisco	7.6	73.2	19.2	5.9	30.1	0.9	0.1	60.4	2.7
6073017009	10.78	14.81	10-15%	4024 San Diego	11.9	77.6	10.5	20.3	66.8	1.3	0.4	8	3.3
6067007904	10.78	14.79	10-15%	4797 Sacramento	11.5	72.3	16.2	10.5	79.7	1.5	0.6	3.3	4.4
6095253201	10.78	14.78	10-15%	4713 Solano	9.8	72.9	17.3	12.3	79.4	2.2	0.3	2	3.7
6059021816	10.78	14.77	10-15%	4833 Orange	10.9	72.7	16.4	15.4	74	0.8	0.2	7.2	2.4
6073013605	10.77	14.76	10-15%	5622 San Diego	10.3	73.7	16	14.2	75.8	2.6	0.5	3.8	3.1
6073009502	10.77	14.74	10-15%	3659 San Diego	11.8	72.2	16	13	62.8	4.5	0.3	14.3	5.1
6073016612	10.76	14.73	10-15%	6143 San Diego	10.9	79.7	9.4	13.9	76.9	1.3	0.8	3.3	3.8
6067007432	10.75	14.72	10-15%	5040 Sacramento	17.7	78.3	4	15.2	62.3	7.1	0.8	10.3	4.3

6081605000	10.74	14.71	10-15%	7603 San Mateo	12.7	66.2	21.1	8.3	52.7	0.7	0	35	3.2
6073017702	10.73	14.69	10-15%	2777 San Diego	9.6	80.2	10.2	11.2	83.9	0.1	0.3	1.9	2.7
6073008364	10.73	14.68	10-15%	4992 San Diego	6	86.8	7.2	11.5	54.4	1.4	0.2	28.2	4.3
6041109001	10.73	14.67	10-15%	3853 Marin	11	76.2	12.8	31.1	58.7	2	0.2	4.6	3.5
6087122100	10.73	14.66	10-15%	3267 Santa Cruz	9.8	77.4	12.8	14.8	77.7	0.7	0.7	2.7	3.4
6067007104	10.72	14.64	10-15%	7689 Sacramento	19.7	76.6	3.7	18.5	36.4	13.3	0.4	25.5	6
6073016809	10.69	14.63	10-15%	5486 San Diego	14	75.4	10.6	19.5	71.8	1.8	0.9	2.8	3.1
6089012601	10.69	14.62	10-15%	5195 Shasta	8.2	74.4	17.4	5.8	85.9	0.9	3.3	0.7	3.4
6087122201	10.68	14.60	10-15%	6269 Santa Cruz	10.7	72.2	17.1	12.7	81.4	0.4	0.4	2.4	2.7
6073017043	10.67	14.59	10-15%	5535 San Diego	16.4	78.2	5.4	9.7	48	3.2	0.2	33.4	5.5
6001430101	10.67	14.58	10-15%	6523 Alameda	13	77.2	9.8	8	36.6	4.1	0.1	47	4.3
6075035201	10.67	14.57	10-15%	5300 San Francisco	8.1	77.2	14.7	5.5	32.8	2.6	0.2	54.7	4.2
6037430600	10.66	14.55	10-15%	4505 Los Angeles	9.4	71.2	19.4	9.9	38.7	0.9	0.1	47.9	2.4
6075013500	10.66	14.54	10-15%	2556 San Francisco	6.3	79.7	14	6.4	73.7	2.5	0.1	14.1	3.2
6037574100	10.66	14.53	10-15%	5098 Los Angeles	12.3	74.4	13.3	18.2	68.3	1.9	0.2	7.3	4.1
6065043267	10.65	14.52	10-15%	6705 Riverside	12.8	69.9	17.3	15.2	72.3	2.5	0.4	6.4	3.2
6037920119	10.65	14.50	10-15%	1896 Los Angeles	17.4	78.5	4.1	21.7	54.2	4.7	0.2	15	4.3
6079012502	10.63	14.49	10-15%	4985 San Luis Obispo	14	78.5	7.5	18.6	74.8	1	0.7	1.7	3.2
6037271500	10.62	14.48	10-15%	2937 Los Angeles	11.6	68.7	19.7	11.2	67.1	1.8	0.2	15.4	4.3
6015000104	10.61	14.47	10-15%	1881 Del Norte	15.2	70.2	14.6	23.7	63.5	0.4	6.3	2.8	3.3
6075026002	10.61	14.45	10-15%	3544 San Francisco	8.4	68.2	23.4	33.5	26.2	3.8	0.2	34	2.3
6001451703	10.60	14.44	10-15%	3859 Alameda	13.6	75.5	10.9	14.1	69.4	1.7	0.2	10.9	3.7
6073017813	10.58	14.43	10-15%	4106 San Diego	12.2	65.4	22.4	7.9	82.9	0.6	0.3	5.6	2.7
6061022800	10.55	14.42	10-15%	4320 Placer	20.2	74.3	5.5	13.5	64.3	1.4	0.3	16.6	3.9
6065044929	10.55	14.40	10-15%	3908 Riverside	5.9	53.4	40.7	16.2	75.8	1.6	0.3	4.7	1.4
6017030810	10.55	14.39	10-15%	3437 El Dorado	14.3	72.2	13.5	15.2	77.8	0.6	0.9	2.2	3.3
6071000816	10.55	14.38	10-15%	3906 San Bernardino	8	70.8	21.2	25	62.3	4.2	0.2	6	2.3
6037300702	10.54	14.36	10-15%	5604 Los Angeles	9.9	68.8	21.3	6.5	79.7	0.7	0	10.6	2.5
6059075808	10.54	14.35	10-15%	3404 Orange	10.6	71.4	18	23.6	67.4	0.9	0.3	5.2	2.7
6073008354	10.54	14.34	10-15%	5972 San Diego	15.7	78.3	6	10.1	33.9	3.8	0.1	47.1	4.9
6087122400	10.53	14.33	10-15%	7167 Santa Cruz	9.6	75.5	14.9	21.3	73.2	0.6	0.3	2.3	2.3
6081606800	10.53	14.31	10-15%	3234 San Mateo	12.6	69	18.4	7	58.1	0.7	0	29.8	4.4
6075012700	10.53	14.30	10-15%	3492 San Francisco	8.8	79.1	12.1	5.4	81.3	0.4	0.1	9.7	3.1
6059052506	10.53	14.29	10-15%	2490 Orange	9.1	75	15.9	8.6	62.9	1.6	0	23.6	3.3
6059021824	10.52	14.28	10-15%	2678 Orange	9.5	82.2	8.3	12.1	71.4	0.9	0.3	13.2	2.1
6067004008	10.51	14.26	10-15%	3596 Sacramento	10.3	77	12.7	17.8	40.4	8.8	0.2	27.3	5.6
6073001000	10.51	14.25	10-15%	4733 San Diego	7.2	86.8	6	26	56.7	7.1	0.3	5.7	4.3
6081613502	10.51	14.24	10-15%	5975 San Mateo	12.4	77	10.6	14.8	77.1	0.7	0.3	3.4	3.5
6111007300	10.50	14.23	10-15%	1930 Ventura	9.4	75	15.6	9.8	82.1	1	0.2	4.2	2.7
6085503322	10.49	14.21	10-15%	4173 Santa Clara	13.1	75.7	11.2	38.6	15.2	5.5	0.3	39.1	1.3
6037800331	10.49	14.20	10-15%	766 Los Angeles	10.3	78.7	11	10.2	72.2	3	0	10.1	4.6
6111007202	10.49	14.19	10-15%	4313 Ventura	9.3	71.3	19.4	8.8	80.5	0.8	0.2	6.8	2.9
6059099511	10.48	14.18	10-15%	3182 Orange	6.6	81.4	12	10.3	81.4	0.4	0.2	4.9	2.7
6065044918	10.47	14.16	10-15%	3030 Riverside	4.2	43.7	52.1	4.6	88.9	0.7	0.3	3.8	1.7
6019006405	10.47	14.15	10-15%	4795 Fresno	10.2	71.2	18.6	12.1	80.2	0.3	2.2	1.6	3.6
6037480201	10.47	14.14	10-15%	3907 Los Angeles	12.5	69.9	17.6	24.2	38.9	1.1	0.2	32.9	2.7
6037480500	10.46	14.13	10-15%	5485 Los Angeles	11.2	76	12.8	15.9	54.2	1.7	0.1	24.3	3.9
6041104101	10.45	14.11	10-15%	7819 Marin	13.8	70.3	15.9	19	68.5	1.7	0.1	6.8	4
6059062641	10.45	14.10	10-15%	4249 Orange	11.9	61.2	26.9	35	51.1	1.1	0.1	10	2.7
6067009637	10.43	14.09	10-15%	6003 Sacramento	19.5	75.1	5.4	15.5	21.8	15.5	0	40.9	6.1
6083002913	10.43	14.07	10-15%	3596 Santa Barbara	9.1	61.4	29.5	14.1	77.3	0.7	0.2	5.5	2.2
6081603000	10.43	14.06	10-15%	4143 San Mateo	9.4	80.6	10	17.4	65.1	1.7	0.5	9.9	5.3
6037194102	10.43	14.05	10-15%	3458 Los Angeles	8.8	74.6	16.6	5.1	82.1	3.2	0.1	6.6	3
6023000600	10.42	14.04	10-15%	4866 Humboldt	11.2	73.5	15.3	9.7	78.6	1.1	2.5	3.6	4.4
6085507205	10.42	14.02	10-15%	4475 Santa Clara	10.6	67.5	21.9	6.6	77.5	0.4	0.1	11.6	3.9
6023010502	10.41	14.01	10-15%	5281 Humboldt	11.7	74.5	13.8	6.2	84.5	0.4	3.5	1.6	3.7
6073019203	10.40	14.00	10-15%	2866 San Diego	12.6	72.5	14.9	29.2	61.4	2.1	0.4	3.6	3.2
6067007102	10.40	13.99	10-15%	7195 Sacramento	14	67.6	18.4	15.1	41.6	10.7	0.3	27.2	5
6071010402	10.40	13.97	10-15%	8442 San Bernardino	19.7	80.1	0.2	22	63.3	6.4	1.1	3.4	3.6
6037701304	10.40	13.96	10-15%	6374 Los Angeles	9.2	70.4	20.4	5.9	81.8	1.3	0.1	7.3	3.7
6081613600	10.39	13.95	10-15%	6018 San Mateo	11.4	76.7	11.9	20.5	70.9	0.6	0.2	4.4	3.4
6111000901	10.39	13.94	10-15%	2541 Ventura	8.1	65.3	26.6	9.6	86.4	0.4	0.2	1.6	1.8
6059052522	10.38	13.92	10-15%	4123 Orange	12.2	80.5	7.3	8.2	38.2	2	0.1	46.7	4.8
6015000101	10.38	13.91	10-15%	3939 Del Norte	15.1	73.3	11.6	11.7	68.5	0.9	6.3	8.9	3.8
6057000300	10.37	13.90	10-15%	2353 Nevada	7.4	70.8	21.8	4.9	89.6	0.5	0.9	0.9	3.2
6075032901	10.37	13.89	10-15%	5021 San Francisco	8.2	74.2	17.6	5	29	0.9	0.3	62.5	2.5
6081608100	10.35	13.87	10-15%	3523 San Mateo	15.2	71.1	13.7	7.3	39.8	1.9	0	45.9	5.1
6085502702	10.33	13.86	10-15%	8042 Santa Clara	13.7	73.5	12.8	13.8	60.6	1.9	0.3	18.7	4.7
6059032053	10.32	13.85	10-15%	7976 Orange	13.4	80.6	6	17.1	67.4	2.1	0.2	9.2	4
6073013417	10.32	13.84	10-15%	2087 San Diego	9.6	81.5	8.9	43.9	28.2	6.1	0.2	17.6	3.9
6075047901	10.32	13.82	10-15%	6400 San Francisco	7.5	75.5	17	5.9	42.1	2.3	0.2	45.7	3.9
6073007501	10.30	13.81	10-15%	4040 San Diego	5.4	90.7	3.9	12.7	79.5	1.7	0.5	2	3.7
6085508003	10.28	13.80	10-15%	2222 Santa Clara	14.5	75.8	9.7	7.2	32.8	1.5	0.3	54.1	4.1
6063000400	10.27	13.78	10-15%	2785 Plumas	9.2	70.9	19.9	9	78.8	0.1	7.4	0.6	4
6037573800	10.27	13.77	10-15%	4284 Los Angeles	12.6	75.5	11.9	20.6	65.8	2.3	0.3	7	3.9
6037920109	10.26	13.76	10-15%	4493 Los Angeles	14	72.1	13.9	14.8	65	3.8	0.3	12.8	3.2
6019006404	10.25	13.75	10-15%	4909 Fresno	11.1	74.5	14.4	10.1	83.4	0.7	1.6	1.3	3
6029003810	10.24	13.73	10-15%	2578 Kern	9.9	80.7	9.4	14.1	75.2	2.4	0.8	4.4	3.2
6041119201	10.23	13.72	10-15%	3288 Marin	7.2	62.9	29.9	11.1	75.9	2.6	0.3	6.1	4.1
6113011002	10.22	13.71	10-15%	3093 Yolo	9.7	67.1	23.2	19.9	74.5	0.5	0.7	2.5	1.9
6113010704	10.20	13.70	10-15%	2267 Yolo	8.3	76.6	15.1	9	67.2	5	0.2	14.2	4.5
6061020715	10.19	13.68	10-15%	3059 Placer	10.9	76.3	12.8	14.5	76.7	1.1	0.9	3	3.7
6079011503	10.19	13.67	10-15%	3624 San Luis Obispo	11.3	78.2	10.5	8.9	83.2	0.8	0.1	4.2	2.7
6067008210	10.19	13.66	10-15%	5472 Sacramento	8.4	65.9	25.7	6.4	83.8	1.3	0.3	5	3.2
6097151203	10.16	13.65	10-15%	5130 Sonoma	11.8	80.1	8.1	18.5	72.5	1.3	0.5	3.6	3.6
6037135203	10.16	13.63	10-15%	7055 Los Angeles	10.6	73	16.4	12	70.3	2	0.1	12	3.7
6067004009	10.15	13.62	10-15%	5129 Sacramento	11	77.8	11.2	16.1	31.9	15.3	0.4	30.8	5.5
6097152502	10.15	13.61	10-15%	3603 Sonoma	10.9	71.1	18	15.7	74.2	1.8	1	3.7	3.6
6065049700	10.13	13.60	10-15%	9511 Riverside	14.3	78	7.7	18.4	70.8	2.6	0.5	4.6	3.1
6075047600	10.11	13.58	10-15%	5137 San Francisco	9.2	74.4	16.4	6.1	39.9	1.5	0.1	48.2	4.2
6049000400	10.11	13.57	10-15%	1265 Modoc	9.6	66.9	23.5	11.7	79.6	0.2	6.2	0.2	2.1
6059042328	10.11	13.56	10-15%	2524 Orange	10.3	75.2	14.5	5.9	78.8	0.7	0.3	9.7	4.6
6083002007	10.10	13.55	10-15%	9554 Santa Barbara	13.6	70.8	15.6	31.5	55.3	2.2	0.5	7.6	2.9
6057000200	10.09	13.53	10-15%	2700 Nevada	8.4	73.2	18.4	5.6	89.6	0.3	1	0.7	2.7
6075013102	10.09	13.52	10-15%	2625 San Francisco	5.3	78.7	16	5.1	76.5	1.2	0.2	13	4
6059042320	10.09	13.51	10-15%	5665 Orange	13.3	80.4	6.3	26.3	56.6	2.7	0.2	11.1	3.1
6017030603	10.09	13.49	10-15%	3566 El Dorado	9.1	74.1	16.8	6.9	87.9	0.2	1.4	0.7	2.8
6039000106	10.08	13.48	10-15%	5021 Madera	11.3	69.6	19.1	10.4	82.2	0.7	2	1.1	3.5
6081602900	10.08	13.47	10-15%	3846 San Mateo	9.5	80.3	10.2	18.1	54.9	3	0.4	18.3	5.3
6023011500	10.08	13.46	10-15%	4409 Humboldt	11.1	77.5	11.4	6.5	85.6	1.1	1.9	0.9	4.1
6037670416	10.07	13.44	10-15%	4139 Los Angeles	9.3	67.6	23.1	5.9	50.2	2.7	0.1	36.1	5
6097153501	10.07	13.43	10-15%	4319 Sonoma	7.7	74.5	17.8	10.9	83.3	0.8	0.3	1.8	2.9
6075013101	10.06	13.42	10-15%	3811 San Francisco	4.5	84.6	10.9	6.7	72.5	1.9	0.1	15.5	3.4
6037910809	10.05	13.41	10-15%	2235 Los Angeles	7.5	79	13.5	12	77.5	1.3	0.1	7	2.1
6001428301	10.05	13.39	10-15%	6526 Alameda	12.5	72.5	15	8.2	38.8	3.4	0.2	42.9	6.5
6059099309	10.05	13.38	10-15%	4547 Orange	8.2	70.1	21.7	10	79.5	0.4	0.2	7.1	2.7
6113010606	10.04	13.37	10-15%	7902 Yolo	10.5	79.7	9.8	16	63.7	2.6	0.3	13.1	4.4
6037920110	10.04	13.36	10-15%	5010 Los Angeles	15.9	80.5	3.6	12.1	66.7	2.6	0.1	15.3	3.3
6059052417	10.03	13.34	10-15%	6771 Orange	10.9	71.1	18	7	50.3	1	0.1	37.1	4.6
6067008211	10.03	13.33	10-15%	2871 Sacramento	8.8	74.2	17	7.9	84.8	0.7	0.5	2.4	3.7
6009000122	10.02	13.32	10-15%	4046 Calaveras	8.5	67.6	23.9	9.9	85.2	1	1	0.7	2.2
6037194101	10.01	13.31	10-15%	3091 Los Angeles	6	83.6	10.4	9.3	77.7	3.9	0.3	5.5	3.3
6055201900	10.00	13.29	10-15%	1293 Napa	8	69.3	22.7	20.1	74.5	0.2	0.9	2.9	1.4
6059052528	10.00	13.28	10-15%	3469 Orange	12.2	77	10.8	8.8	46.2	1.7	0.1	39.1	4.2
6073020027	10.00	13.27	10-15%	13665 San Diego	19.6	67.1	13.3	14.3	69.3	1.7	0.3	10.2	4.3
6075032601	10.00	13.26	10-15%	4416 San Francisco	7.3	79.1	13.6	6.6	35.6	1.5	0.2	52.1	4
6059052427	10.00	13.24	10-15%	5119 Orange	15.4	81.2	3.4	13.5	59.5	1.2	0.4	20.8	4.7
6037621201	10.00	13.23	10-15%	6452 Los Angeles	10	79.7	10.3	15.4	68.6	2.7	0.2	8.5	4.5
6085507702	9.99	13.22	10-15%	6126 Santa Clara	9.8	74.8	15.4	1.8	32.5	0.2	0	62.7	2.7
6095252910	9.99	13.20	10-15%	5617 Solano	14.3	78.2	7.5	20.8	57.7	7	0.8	6.5	7.2
6059032039	9.99	13.19	10-15%	6696 Orange	12.4	82.4	5.2	20.2	64.2	0.8	0.1	10.5	4.2
6075016500	9.98	13.18	10-15%	5083 San Francisco	7.2	81.6	11.2	9.1	66.5	6.9	0.4	12.3	4.8
6065043264	9.97	13.17	10-15%	7683 Riverside	16	77.7	6.3	22.9	60.5	3.5	0.4	8.1	4.6

6075013300	9.96	13.15	10-15%	4232 San Francisco	11.9	65	23.1	4.6	80.9	1.3	0.2	10.3	2.7
6053013600	9.96	13.14	10-15%	4396 Monterey	16.2	74	9.8	59.7	26.8	3	0.3	7.1	3.1
6095252311	9.96	13.13	10-15%	4557 Solano	12.2	78.9	8.9	14.7	42.6	15.4	0.1	20.8	6.4
6029003305	9.96	13.12	10-15%	3608 Kern	11.4	76.6	12	18.1	77.5	0.4	0.9	1	2.1
6037910302	9.96	13.10	10-15%	6387 Los Angeles	11.1	78	10.9	23.4	59.4	7.7	0.7	5.3	3.5
6013334200	9.94	13.09	10-15%	6794 Contra Costa	10.8	64.4	24.8	6.2	80.8	1.3	0.1	8.2	3.5
6081606700	9.92	13.08	10-15%	2348 San Mateo	10.6	67.1	22.3	8.1	68.8	0.3	0	19.6	3.3
6065045214	9.92	13.07	10-15%	5648 Riverside	10.2	68.8	21	21.6	71.7	1.6	0.2	2.9	1.9
6037141500	9.92	13.05	10-15%	2984 Los Angeles	10.9	65.5	23.6	5.4	84.5	1.4	0	5.5	3.3
6067005804	9.91	13.04	10-15%	2585 Sacramento	9.4	63.8	26.8	6	83.2	1	0.2	6.7	2.9
6111007610	9.90	13.03	10-15%	5118 Ventura	13.3	78.6	8.1	16.8	72.5	1.3	0.3	5.6	3.4
6111005909	9.90	13.02	10-15%	3395 Ventura	10	70.1	19.9	15.7	74	1	0.2	7	2.1
6037574901	9.90	13.00	10-15%	3725 Los Angeles	13.3	75.3	11.4	15.4	70	1.7	0.2	8.4	4.2
6095252912	9.89	12.99	10-15%	5625 Solano	11.6	80.2	8.2	13.5	65.3	6.8	0.3	8.3	5.8
6079010902	9.89	12.98	10-15%	3874 San Luis Obispo	2.6	93.3	4.1	12.5	76.6	0.9	0.2	6.6	3.2
6085503324	9.88	12.97	10-15%	3543 Santa Clara	11.4	78.9	9.7	17.4	8.1	2.5	0.1	69.7	2.2
6081603200	9.87	12.95	10-15%	3828 San Mateo	11.5	77.1	11.4	14.4	70.9	0.9	0.5	7.3	5.9
6113010512	9.86	12.94	10-15%	3406 Yolo	10.4	82	7.6	14.6	55.5	4.1	0.2	21.4	4.1
6085503313	9.86	12.93	10-15%	4582 Santa Clara	11.9	78.1	10	24	19.6	3	0.2	50.6	2.7
6013304004	9.85	12.91	10-15%	3738 Contra Costa	8.8	74.7	16.5	11.2	80.6	2	0.6	2.5	3
6013338201	9.85	12.90	10-15%	3790 Contra Costa	11.5	65.3	23.2	10.4	70	1	0.3	14.1	4.2
6081600401	9.85	12.89	10-15%	3240 San Mateo	10.2	77.4	12.4	24.6	13.9	5.7	0.1	51.3	4.4
6001435103	9.84	12.88	10-15%	6403 Alameda	14.7	75.6	9.7	12.2	36.7	7.7	0.1	37.9	5.4
6079011504	9.84	12.86	10-15%	1362 San Luis Obispo	3	88.9	8.1	25.6	67.4	3.2	0.7	0.9	2.1
6059021817	9.83	12.85	10-15%	3479 Orange	11.4	78.1	10.5	16.6	69.7	1.3	0.1	9	3.4
6097152400	9.82	12.84	10-15%	10001 Sonoma	8.8	68.3	22.9	6.7	82.3	0.8	0.3	7.1	2.8
6073000100	9.80	12.83	10-15%	3029 San Diego	9.2	68.4	22.4	7.9	86.3	0.9	0.5	2.5	2
6073007400	9.79	12.81	10-15%	6590 San Diego	8.9	82.7	8.4	12.4	78.8	1.4	0.4	3	4
6059062628	9.79	12.80	10-15%	3581 Orange	7.9	85.8	6.3	7.1	50.1	1.7	0.1	36.8	4
6037920104	9.78	12.79	10-15%	2798 Los Angeles	11.9	81.5	6.6	20.3	68.5	2.6	0.3	5.6	2.8
6037464100	9.78	12.78	10-15%	7210 Los Angeles	12	70.1	17.9	7.8	44.2	0.6	0	44.5	2.9
6037460200	9.77	12.76	10-15%	5315 Los Angeles	10.4	73.8	15.8	16.8	37.1	36	0.3	4.7	5.2
6073020401	9.77	12.75	10-15%	2369 San Diego	7.4	69.7	22.9	7.5	86.6	0.5	0.2	3.6	1.6
6075032902	9.77	12.74	10-15%	3831 San Francisco	8.7	73.3	18	4.9	25.2	0.9	0	67.1	2
6097151502	9.77	12.73	10-15%	6591 Sonoma	10.2	72.9	16.9	13.2	77.6	1.4	0.6	4	3.2
6059032029	9.75	12.71	10-15%	4328 Orange	13	80.9	6.1	22.8	60.9	1.1	0.2	11.2	3.8
6059099243	9.75	12.70	10-15%	4287 Orange	9.2	79.2	11.6	10.7	74.6	0.7	0.2	10.8	2.9
6001450701	9.75	12.69	10-15%	8075 Alameda	11.8	79.6	8.6	6.6	67.9	1.2	0.1	20.3	3.9
6059075702	9.74	12.67	10-15%	3343 Orange	10.6	69.4	20	19.3	71	0.5	0.1	7.1	2
6061020711	9.73	12.66	10-15%	4372 Placer	11.9	74.8	13.3	12	73.5	2	0.5	8.2	3.8
6037139802	9.73	12.65	10-15%	3865 Los Angeles	10.7	67.7	21.6	4.6	83.4	2.2	0	6	3.8
6073008352	9.72	12.64	10-15%	3517 San Diego	14	75.7	10.3	16.7	28.9	3.9	0.1	44.6	5.8
6075031100	9.72	12.62	10-15%	6193 San Francisco	8.8	77.7	13.5	18	42.6	3	0.3	31.5	4.6
6075042602	9.71	12.61	10-15%	3243 San Francisco	11.4	74.7	13.9	5.6	53.6	1.3	0.3	34.3	4.9
6071010422	9.71	12.60	10-15%	1645 San Bernardino	15.4	74.4	10.2	18.2	61.9	6.7	1	5.2	7.1
6037264302	9.70	12.59	10-15%	5683 Los Angeles	8	75.1	16.9	5	80.5	1.3	0.1	8.6	4.4
6001423700	9.70	12.57	10-15%	3633 Alameda	5.2	80.2	14.6	7.6	66	2.1	0.1	19.7	4.6
6037400501	9.69	12.56	10-15%	2126 Los Angeles	7.3	73	19.7	15.5	74.6	0.3	0.1	7.1	2.4
6087120700	9.66	12.55	10-15%	4120 Santa Cruz	10	78.1	11.9	6.7	87.7	0.5	0.3	1.9	2.9
6037269300	9.66	12.54	10-15%	3885 Los Angeles	15.6	68.2	16.2	6.9	79.2	1.1	0	9.1	3.7
6111002000	9.66	12.52	10-15%	2577 Ventura	9	72.8	18.2	10.7	83.1	0.7	0.4	2.6	2.5
6069000801	9.65	12.51	10-15%	3082 San Benito	9	66.7	24.3	20.5	73.3	0.7	0.2	3.3	2
6013354001	9.65	12.50	10-15%	1859 Contra Costa	12.7	70.8	16.5	3.7	81.4	1.1	0.1	8.3	5.3
6065045110	9.65	12.49	10-15%	5401 Riverside	14.1	78.1	7.8	54.7	39.2	2.4	0.4	1.3	1.9
6083002708	9.64	12.47	10-15%	2568 Santa Barbara	11.5	71.4	17.1	32.9	58.2	2.4	0.7	3.4	2.4
6075016900	9.64	12.46	10-15%	2924 San Francisco	4.6	87	8.4	9.9	71.7	3.2	0.4	10	4.8
6037910301	9.64	12.45	10-15%	4219 Los Angeles	9.5	77.8	12.7	18.2	68.6	6.2	0.8	4.2	2
6037261101	9.64	12.44	10-15%	3499 Los Angeles	12.5	68.8	18.7	5	86.4	1.8	0.1	3.7	3.1
6059099307	9.63	12.42	10-15%	2502 Orange	6.9	71.3	21.8	9.3	77.5	0.8	0.3	8.1	3.9
6053013300	9.63	12.41	10-15%	5693 Monterey	11.6	77.8	10.6	29.7	53.8	3	0.4	9.1	4.1
6097151309	9.63	12.40	10-15%	4865 Sonoma	9.9	79.6	10.5	15.1	75.1	1.1	0.7	4.6	3.4
6083002930	9.63	12.38	10-15%	7328 Santa Barbara	10.9	82.1	7	33	48.9	1.9	0.3	12.5	3.5
6001405000	9.62	12.37	10-15%	3136 Alameda	13.8	73.4	12.8	7.3	65.6	9.6	0.2	12	5.3
6085502906	9.62	12.36	10-15%	4521 Santa Clara	13.9	76.5	9.6	23.1	58.4	2.4	0.4	11.7	4
6073017403	9.62	12.35	10-15%	4922 San Diego	9.4	69.2	21.4	10.5	82.5	0.3	0.2	3.7	2.7
6041130202	9.62	12.33	10-15%	4453 Marin	6.2	73.7	20.1	3.8	87.8	1	0.1	4.5	2.7
6065940800	9.61	12.32	10-15%	2613 Riverside	2	52.9	45.1	7.6	87.5	1.5	0.4	1.6	1.5
6059042205	9.60	12.31	10-15%	6780 Orange	11.6	73.6	14.8	20.1	73.5	0.4	0.1	3.3	2.6
6083001203	9.60	12.30	10-15%	2757 Santa Barbara	6.7	75.2	18.1	14.1	76.1	1.2	0.2	5.9	2.4
6073009706	9.60	12.28	10-15%	6996 San Diego	8.9	63.9	27.2	10.1	78.2	2.5	0.3	5.8	3
6083000302	9.59	12.27	10-15%	4138 Santa Barbara	9.5	78.5	12	37.5	54.6	1.4	0.4	4	2.2
6037408706	9.57	12.26	10-15%	1665 Los Angeles	8.4	78.1	13.5	15.5	14.2	0.5	0	67.6	2.2
6073017810	9.57	12.25	10-15%	4942 San Diego	8.5	72.8	18.7	11.6	80.8	0.6	0.4	3.6	2.9
6083002914	9.57	12.23	10-15%	3248 Santa Barbara	9	65.7	25.3	15.9	71.7	0.6	0.1	9.7	2.1
6037573700	9.57	12.22	10-15%	4554 Los Angeles	12.3	74.7	13	19.7	66.8	2.2	0.4	7.2	3.7
6045011800	9.57	12.21	10-15%	2082 Mendocino	11.9	74.1	14	26.1	62.2	0.3	7.9	1.1	2.4
6067008144	9.56	12.20	10-15%	2541 Sacramento	11.3	76.1	12.6	11	79.9	2.2	0.4	3.1	3.4
6073009705	9.54	12.18	10-15%	3652 San Diego	11.7	67.3	21	15	70.6	4.9	0.3	4.3	4.9
6073013419	9.53	12.17	10-15%	7922 San Diego	17.6	76.1	6.3	48.3	24.4	4.8	0.1	18.6	3.7
6067000200	9.53	12.16	10-15%	3497 Sacramento	11.3	75	13.7	11	80.9	1	0.4	3.7	3
6001450601	9.53	12.15	10-15%	3379 Alameda	9.4	78	12.6	6.9	64.9	1.7	0.2	22.6	3.6
6037701202	9.53	12.13	10-15%	3268 Los Angeles	8.9	78.8	12.3	7.5	76.9	1.2	0	9.4	5
6059099215	9.53	12.12	10-15%	5203 Orange	11.4	79.6	9	18.1	65.6	0.7	0.3	10.6	4.8
6085503333	9.52	12.11	10-15%	4585 Santa Clara	14.8	77	8.2	27	18.5	3.9	0.2	47.4	3.1
6111001202	9.51	12.09	10-15%	7191 Ventura	11.5	75.2	13.3	21.2	69.9	0.9	0.3	4.1	3.5
6081606500	9.49	12.08	10-15%	3613 San Mateo	15.5	66.3	18.2	8.9	75.1	0.7	0.1	11.6	3.5
6073008307	9.48	12.07	10-15%	3794 San Diego	8.6	65.9	25.5	7.5	76.1	0.8	0.2	12.2	3.2
6089010601	9.48	12.06	10-15%	2492 Shasta	10.4	70.5	19.1	7.2	83.7	1.1	1.2	3.8	2.9
6013362000	9.47	12.04	10-15%	2767 Contra Costa	10.1	73.8	16.1	14.9	53.8	11.2	0	13.2	6.9
6081609201	9.46	12.03	10-15%	3574 San Mateo	13.9	71.9	14.2	11.8	73.5	0.4	0.2	9.6	4.4
6073007908	9.44	12.02	10-15%	2819 San Diego	4.9	90.3	4.8	19	73.2	1.2	0.2	3.3	3
6065051400	9.44	12.01	10-15%	6956 Riverside	0.1	16.7	83.2	2.5	94.7	0.8	0.1	1.4	0.5
6073008329	9.44	11.99	10-15%	6347 San Diego	11	83	6	8.3	62.8	1.4	0.2	23.5	3.7
6019005517	9.44	11.98	10-15%	7487 Fresno	14.2	75.6	10.2	15.1	65.9	1.5	0.4	14.4	2.7
6037460800	9.43	11.97	10-15%	3248 Los Angeles	9.5	65.9	24.6	8.9	72.2	2.5	0	13	3.4
6065045215	9.43	11.96	10-15%	8515 Riverside	13.1	75.6	11.3	27.5	62.9	1.5	0.3	5.6	2.3
6001442100	9.43	11.94	10-15%	5166 Alameda	11.8	74.5	13.7	2.7	20.6	0.7	0	73.8	2.2
6035040305	9.43	11.93	10-15%	4146 Lassen	14.9	76.5	8.6	11.8	74.9	1	6.8	1.8	3.8
6085508101	9.42	11.92	10-15%	6740 Santa Clara	20.1	68.4	11.5	3.1	27	0.6	0.1	66.4	2.8
6037620702	9.42	11.91	10-15%	7059 Los Angeles	16	74.6	9.4	14.5	65.2	1.9	0.2	12.9	5.3
6059042333	9.42	11.89	10-15%	4014 Orange	8	78.5	13.5	6.6	75.8	0.9	0	13	3.7
6067000100	9.42	11.88	10-15%	3558 Sacramento	11.7	69	19.3	9.9	82.7	0.5	0.3	4	2.6
6023010400	9.42	11.87	10-15%	3688 Humboldt	12.4	77	10.6	6.9	82.9	0.7	4.3	0.8	4.4
6075021000	9.41	11.86	10-15%	4196 San Francisco	6.4	85.8	7.8	21.8	62.4	1.8	0.2	10	3.8
6073009505	9.41	11.84	10-15%	6442 San Diego	11.3	77.4	11.3	9.6	67.1	2.5	0.3	16	4.5
6037920107	9.41	11.83	10-15%	3954 Los Angeles	21	76.2	2.8	18.1	47.8	4.3	0.1	25.3	4.5
6073016608	9.40	11.82	10-15%	2526 San Diego	12.7	78	9.3	13	79	0.9	0.9	3	3.2
6037800408	9.40	11.80	10-15%	7122 Los Angeles	8.6	73.6	17.8	6.1	88	0.9	0.1	2.2	2.6
6059032002	9.40	11.79	10-15%	6210 Orange	11.7	72.7	15.6	15.9	73.5	1.3	0.1	6.6	2.5
6037480002	9.40	11.78	10-15%	3453 Los Angeles	10.1	70.4	19.5	17.5	28.8	0.8	0.1	50.4	2.4
6059062605	9.40	11.77	10-15%	3094 Orange	6	78.7	15.3	9.2	85.2	0.5	0.3	2.1	2.7
6113011205	9.38	11.75	10-15%	8123 Yolo	16.7	77.5	5.8	46.8	34.7	1.2	0.4	13.5	3.5
6087121600	9.38	11.74	10-15%	6159 Santa Cruz	9.4	79.7	10.9	19.7	73.6	0.8	0.5	2.4	2.9
6111005203	9.38	11.73	10-15%	5226 Ventura	10.1	71.9	18	18.3	71.5	1.4	0.2	5.3	3.2
6013385100	9.37	11.72	10-15%	2765 Contra Costa	9.1	64.4	26.5	7.9	56.3	5.5	0.3	25	5
6001436402	9.37	11.70	10-15%	2618 Alameda	8.4	71.9	19.7	16.7	52.1	12.6	0.5	13.4	4.7
6059063010	9.37	11.69	10-15%	7096 Orange	10.9	75.1	14	8.8	82.5	0.8	0.1	5.3	2.5
6073020107	9.36	11.68	10-15%	3837 San Diego	14.3	76	9.7	37.9	50.7	1.8	0.6	6.8	2.3
6059042339	9.35	11.67	10-15%	3208 Orange	10.3	75.4	14.3	19.8	73.1	1.2	0.2	3.3	2.4
6085504308	9.35	11.65	10-15%	4415 Santa Clara	10.4	71.9	17.7	16.5	30.7	2.7	0	46.3	3.8
6045011001	9.35	11.64	10-15%	1952 Mendocino	6.6	66.5	26.9	4.6	89.9	0.1	0.9	1.1	3.4
6041133000	9.34	11.63	10-15%	3226 Marin	9.9	71.7	18.4	17.7	78.5	0.4	0.3	1.3	1.7
6027000300	9.34	11.62	10-15%	2457 Inyo	7.9	66.7	25.4	10.1	85.9	0.2	0.5	1.6	1.8

6087121403	9.34	11.60	10-15%	3362 Santa Cruz	10.6	79.6	9.8	23.6	68.4	1.6	0.4	2.9	3.1
6073013311	9.32	11.59	10-15%	9463 San Diego	14.3	79.7	6	44.1	23.9	5.7	0.2	22.3	3.7
6067008145	9.32	11.58	10-15%	7345 Sacramento	11.9	76.7	11.4	10.4	80.7	1.1	0.7	3.8	3.2
6013323000	9.30	11.57	10-15%	4352 Contra Costa	12.9	74.6	12.5	12.3	74.9	0.7	0.4	7.5	4.3
6087121200	9.30	11.55	10-15%	6114 Santa Cruz	9.1	77.9	13	7.1	85.3	0.6	0.2	3.4	3.5
6001450606	9.30	11.54	10-15%	5733 Alameda	11.5	78.1	10.4	6.3	66.5	1.1	0.2	22.2	3.8
6059052520	9.29	11.53	10-15%	3460 Orange	11.2	76.8	12	8.2	60.5	1.5	0.1	25.3	4.5
6085502302	9.29	11.51	10-15%	2826 Santa Clara	14.9	75.7	9.4	28.5	56.9	2.9	0.5	7.4	3.8
6013343002	9.29	11.50	10-15%	4380 Contra Costa	8.8	65.8	25.4	6.9	77.2	1.9	0.2	10.5	3.3
6065044930	9.29	11.49	10-15%	3213 Riverside	13.8	61.3	24.9	40.9	51.9	1.1	0.1	4.6	1.4
6073008343	9.28	11.48	10-15%	4587 San Diego	9.1	83.6	7.3	11.6	42.4	1.9	0.2	40.1	3.8
6073008363	9.28	11.46	10-15%	4921 San Diego	6.4	91.4	2.2	9.2	32.7	1.1	0.1	53.3	3.7
6097151311	9.27	11.45	10-15%	6382 Sonoma	10.8	85	4.2	16.4	70.1	1.6	0.4	7.7	3.9
6081605200	9.27	11.44	10-15%	3626 San Mateo	17.4	69.1	13.5	8.6	72.8	0.4	0.1	14.4	3.8
6085503326	9.27	11.43	10-15%	6650 Santa Clara	17.7	75.6	6.7	11.3	8	1.4	0	77.2	2.2
6063000201	9.27	11.41	10-15%	1844 Plumas	5.1	57.5	37.4	3.5	93.9	0.1	0.4	0.7	1.4
6097153903	9.27	11.40	10-15%	3760 Sonoma	9.7	73.9	16.4	19.5	77.4	0.5	0.4	0.9	1.3
6073017032	9.27	11.39	10-15%	13593 San Diego	18.3	75.5	6.2	9.3	52.2	2.2	0.1	31.3	4.8
6095252310	9.26	11.38	10-15%	3156 Solano	10.3	70.7	19	11	62.5	5.7	0.3	16.8	3.8
6073019301	9.25	11.36	10-15%	6936 San Diego	12.1	78.2	9.7	22.8	59.9	3	0.4	10.3	3.7
6059042114	9.25	11.35	10-15%	3718 Orange	10.3	71.8	17.9	17.5	75.8	0.8	0.6	2.8	2.4
6065044921	9.25	11.34	10-15%	2355 Riverside	8.4	56	35.6	9.7	79.2	2.3	0.7	6.6	1.5
6073020706	9.24	11.33	10-15%	6286 San Diego	9.6	73.4	17	18.1	73.9	0.9	0.4	4.3	2.4
6073020026	9.24	11.31	10-15%	4089 San Diego	10.4	65.4	24.2	17.1	71.8	1.1	0.4	6.3	3.2
6087120302	9.24	11.30	10-15%	2602 Santa Cruz	9.4	82.5	8.1	8.8	85.6	0.3	0.8	1	3.4
6111006301	9.23	11.29	10-15%	6573 Ventura	10.3	68	21.7	12.3	76.8	1	0.1	6.7	3.1
6059032041	9.22	11.28	10-15%	1022 Orange	11	81.1	7.9	15.8	75.4	0.8	0.6	4.6	2.8
6059032036	9.21	11.26	10-15%	3539 Orange	11.4	73.1	15.5	16	71.5	0.6	0.3	7.9	3.6
6075016700	9.21	11.25	10-15%	4652 San Francisco	5.8	89.2	5	10	70.2	5.5	0.4	9.2	4.7
6059099216	9.20	11.24	10-15%	4000 Orange	11.6	75.2	13.2	13.4	71.8	0.6	0.2	10.5	3.5
6085509700	9.20	11.22	10-15%	3128 Santa Clara	12.5	78.8	8.7	17.6	57	1.3	0.3	20	3.8
6081611300	9.17	11.21	10-15%	4757 San Mateo	11.3	72.9	15.8	17.7	69.6	1.1	0.1	8.3	3.1
6085503001	9.16	11.20	10-15%	4063 Santa Clara	12.8	70.3	16.9	13.1	74.3	1	0.2	8.5	2.9
6083001905	9.16	11.19	10-15%	3231 Santa Barbara	8.1	72.9	19	16.3	78.6	0.8	0.2	2.8	1.2
6037262501	9.14	11.17	10-15%	3662 Los Angeles	14.8	66.2	19	4.3	89.8	0.3	0.1	3.3	2.2
6013351102	9.13	11.16	10-15%	3635 Contra Costa	0.1	14.9	85	2.7	88.8	0.5	0.2	6.4	1.3
6037262601	9.13	11.15	10-15%	3660 Los Angeles	11	71.6	17.4	3.4	84	1.2	0	8.5	2.9
6111007607	9.13	11.14	10-15%	6152 Ventura	10.7	81.8	7.5	12.7	74.2	1.3	0.3	7.9	3.6
6083002005	9.13	11.12	10-15%	4967 Santa Barbara	13.4	69	17.6	21.8	70.4	1.7	0.7	3.1	2.4
6087122003	9.12	11.11	10-15%	6543 Santa Cruz	10.1	74.6	15.3	15.8	73.8	1.1	0.2	5.3	3.7
6059062900	9.10	11.10	10-15%	1626 Orange	4.9	57.9	37.2	4.6	92.1	0.2	0.1	2.3	0.8
6059042334	9.10	11.09	10-15%	5300 Orange	11.4	74.2	14.4	18.8	64.4	1.1	0.2	11.3	4.2
6045010801	9.10	11.07	10-15%	5915 Mendocino	11.9	75.1	13	17.6	73.9	0.4	4.7	0.9	2.5
6079012302	9.10	11.06	10-15%	5137 San Luis Obispo	9.6	72.7	17.7	11.1	84.1	0.2	0.6	1.6	2.4
6085512036	9.09	11.05	10-15%	4585 Santa Clara	16.7	77.6	5.7	20.2	38.8	3.4	0.2	32.7	4.7
6041103200	9.09	11.04	10-15%	6504 Marin	10.7	69.8	19.5	21	66.1	3.1	0.2	6	3.6
6037700600	9.09	11.02	10-15%	5537 Los Angeles	9.2	67	23.8	5.4	84.8	0.9	0	4.3	4.6
6059042206	9.07	11.01	10-15%	3287 Orange	8.5	65.2	26.3	11.7	83.4	0.3	0.3	2.5	1.8
6073019105	9.07	11.00	10-15%	5722 San Diego	8.1	68.8	23.1	14.7	74.9	1.3	0.3	6.6	2.2
6059062640	9.06	10.98	10-15%	3407 Orange	10.3	85.4	4.3	13.6	67.4	1.8	0.2	12.8	4.2
6115041100	9.06	10.97	10-15%	4941 Yuba	9.9	71.5	18.6	6.4	83.4	0.5	3.2	1.3	5.2
6013351103	9.05	10.96	10-15%	1846 Contra Costa	0	10.7	89.3	1.2	91	0.4	0	6.6	0.8
6073017040	9.05	10.95	10-15%	4363 San Diego	11.2	77.9	10.9	17.9	62.4	1.8	0.4	13.7	3.8
6013341000	9.05	10.93	10-15%	4864 Contra Costa	11.5	75.5	13	9	75.8	1.2	0.2	9.5	4.4
6075030301	9.03	10.92	10-15%	5658 San Francisco	9.1	74.4	16.5	7	47.1	1.4	0.1	39.6	4.9
6073020013	9.03	10.91	10-15%	12473 San Diego	19.5	71.8	8.7	13.9	69.2	1.8	0.2	11	3.9
6105000300	9.02	10.90	10-15%	3105 Trinity	8.6	72.7	18.7	7.4	80.7	0.1	5.4	0.5	5.9
6085509109	9.01	10.88	10-15%	4346 Santa Clara	14.6	80.7	4.7	12.5	44.5	1.9	0	36.6	4.4
6081606400	9.00	10.87	10-15%	4820 San Mateo	8.8	66.1	25.1	10.4	62.8	1.8	0.1	20.9	4.1
6085511302	8.98	10.86	10-15%	4062 Santa Clara	7.5	67.9	24.6	5.3	71.4	1.8	0.2	17.3	4
6037264102	8.98	10.85	10-15%	2873 Los Angeles	6.3	81	12.7	6.3	78.1	1.8	0	9.9	3.9
6001430300	8.97	10.83	10-15%	3670 Alameda	9.3	72.2	18.5	12.6	65.4	2.8	0.2	14.9	4
6041101100	8.97	10.82	10-15%	2569 Marin	8.7	70.6	20.7	6.9	84.9	0.7	0.2	4.7	2.7
6073008353	8.96	10.81	10-15%	5048 San Diego	11.5	77.7	10.8	11.7	38.8	3.8	0.3	39	6.2
6001420200	8.96	10.80	10-15%	2898 Alameda	12.2	77.3	10.5	11.4	46	3.1	0.2	32.3	7
6037261200	8.95	10.78	10-15%	4341 Los Angeles	11.3	67.6	21.1	4.8	83.2	0.9	0.1	6.7	4.4
6081605100	8.94	10.77	10-15%	3014 San Mateo	13.2	76.7	10.1	14.9	62.6	1.1	0.1	16	5.3
6085507904	8.94	10.76	10-15%	3367 Santa Clara	11.8	73.7	14.5	2.1	31.1	0.4	0.1	63.6	2.7
6085512200	8.94	10.75	10-15%	4014 Santa Clara	12	74.6	13.4	20.1	67.1	0.9	0.3	8.9	2.7
6111006400	8.94	10.73	10-15%	7126 Ventura	11.1	73.3	15.6	15.2	74.7	0.9	0.2	6.3	2.8
6073020015	8.94	10.72	10-15%	3841 San Diego	8.4	75.4	16.2	8.6	81.4	0.7	0.3	5.8	3.2
6065045103	8.92	10.71	10-15%	3623 Riverside	6.7	57.4	35.9	22.7	72.3	1	0.1	2.5	1.4
6073008312	8.92	10.69	10-15%	3629 San Diego	7.3	61.5	31.2	7.3	81.8	0.6	0.1	7.5	2.8
6023940000	8.91	10.68	10-15%	3041 Humboldt	19.8	71.8	8.4	6.2	10.5	0.1	78.5	0.3	4.4
6023000800	8.90	10.67	10-15%	4668 Humboldt	11.6	71.1	17.3	8.1	80.6	1	2.7	3.5	4.1
6037143902	8.90	10.66	10-15%	3000 Los Angeles	10.7	75.9	13.4	7.3	81.3	3.2	0.2	5.3	2.8
6037920108	8.89	10.64	10-15%	3439 Los Angeles	19.2	76.5	4.3	13.6	50.6	4.4	0.1	27.6	3.7
6001450744	8.89	10.63	10-15%	4831 Alameda	13.9	77.2	8.9	9	60.8	1.8	0.2	23.7	4.6
6001403701	8.89	10.62	10-15%	2587 Alameda	4.4	79.2	16.4	9.1	49.7	21	0.4	13.8	5.9
6037650502	8.87	10.61	10-15%	4294 Los Angeles	10	72.6	17.4	11.6	55.6	1.7	0.3	26.3	4.4
6041121100	8.86	10.59	10-15%	5175 Marin	13.7	71.2	15.1	9.3	80.7	0.7	0	5.1	4.2
6059032033	8.85	10.58	10-15%	3624 Orange	12.8	80.7	6.5	21.9	60.2	1.8	0.1	11.9	4.1
6087120800	8.84	10.57	10-15%	5863 Santa Cruz	9.8	68.1	22.1	7.3	85.2	0.3	0.3	3.8	3
6081609000	8.83	10.56	10-15%	2562 San Mateo	11.7	67.8	20.5	11.1	67.7	1.4	0.1	15.1	4.6
6037576700	8.83	10.54	10-15%	4047 Los Angeles	6.9	80.2	12.9	19.4	64.7	5.6	0.4	6.3	3.7
6057000104	8.83	10.53	10-15%	3190 Nevada	6.4	62.1	31.5	6	89.7	0.2	0.8	0.8	2.6
6087100400	8.82	10.52	10-15%	7331 Santa Cruz	2.1	97.6	0.3	21.4	48.7	1.7	0.2	21.1	6.9
6085510001	8.81	10.51	10-15%	6116 Santa Clara	14.1	66.3	19.6	3.3	66.2	0.7	0.1	25.5	4.3
6081608002	8.79	10.49	10-15%	3517 San Mateo	12.6	70.8	16.6	5	50.5	1.8	0	39.5	3.2
6073009801	8.78	10.48	10-15%	4894 San Diego	9.5	66.8	23.7	12.9	74.2	3.7	0.3	5.6	3.3
6075016801	8.78	10.47	10-15%	3218 San Francisco	5	89.7	5.3	12.1	64.5	8.2	0.3	9.7	5.2
6041111000	8.78	10.46	10-15%	5852 Marin	9.6	81.7	8.7	23.8	63.3	3	0.3	5.8	3.8
6067002500	8.77	10.44	10-15%	1587 Sacramento	11.3	73.9	14.8	9.6	78.8	2.8	0.1	4.4	4.2
6017031406	8.76	10.43	10-15%	5544 El Dorado	11.2	72.4	16.4	6.2	89	0.3	1.4	0.9	2.3
6079012704	8.76	10.42	10-15%	8650 San Luis Obispo	9.3	70.8	19.9	9.8	85.6	0.5	0.6	1.4	2
6013384000	8.76	10.40	10-15%	3883 Contra Costa	11.6	69.3	19.1	8.3	52.9	10.2	0.4	21.3	7
6059099245	8.75	10.39	10-15%	3035 Orange	9.3	76.1	14.6	11.8	72.1	1.2	0.3	10.9	3.7
6037920012	8.75	10.38	10-15%	1072 Los Angeles	10.1	76.7	13.2	11.4	81.8	0.5	0.8	1.7	3.8
6037480703	8.75	10.37	10-15%	3277 Los Angeles	12.8	75.6	11.6	21.8	42.4	2.6	0.1	28.2	4.9
6059042109	8.73	10.35	10-15%	4865 Orange	11.2	76.4	12.4	14.3	75.5	0.8	0.2	5.6	3.6
6073016605	8.73	10.34	10-15%	7339 San Diego	11.7	71	17.3	16.5	73.5	2	0.6	4.3	3.1
6073007905	8.72	10.33	10-15%	2584 San Diego	3.2	89.9	6.9	8.4	83.6	1.2	0.3	3.4	3.1
6059032040	8.72	10.32	10-15%	2612 Orange	11.1	78.8	10.1	9.6	76.6	0.8	0.1	9.6	3.2
6061023400	8.72	10.30	10-15%	4479 Placer	19.5	74.6	5.9	15.2	72.6	1.7	0.6	5.7	4.2
6073017031	8.72	10.29	10-15%	3853 San Diego	15.7	75.9	8.4	14.3	64.1	3.3	0.5	14	3.9
6043000301	8.72	10.28	10-15%	3743 Mariposa	9	68.7	22.3	5.8	85.9	0.5	3	1.1	3.7
6073020811	8.71	10.27	10-15%	5650 San Diego	11.4	75.3	13.3	11.2	82.8	0.9	0.8	1.8	2.5
6077004201	8.71	10.25	10-15%	6412 San Joaquin	13.5	68.6	17.9	22.5	71.6	0.4	0.4	3.1	2
6085511301	8.70	10.24	10-15%	3671 Santa Clara	10.1	68.7	21.2	6.7	72.1	3.3	0.1	13.9	4
6001451403	8.70	10.23	10-15%	2220 Alameda	13.5	76.8	9.7	26.2	59.5	1.6	0.3	7.8	4.6
6065044517	8.70	10.22	10-15%	2377 Riverside	6.8	64.4	28.8	15.4	74.5	4.3	0.4	3.4	2
6007000402	8.69	10.20	10-15%	7030 Butte	12.3	70.3	17.4	11.6	81.3	1	0.7	2.8	2.6
6061020501	8.68	10.19	10-15%	2879 Placer	9.2	72.6	18.2	8.4	86.1	0.4	0.8	2	2.3
6081607000	8.68	10.18	10-15%	3241 San Mateo	11.8	68	20.2	10.6	60.2	1.1	0.1	24.1	3.9
6065045228	8.67	10.17	10-15%	3936 Riverside	19.7	75.4	4.9	48.1	44.6	1.4	0.3	3.9	1.7
6037920045	8.66	10.15	10-15%	4622 Los Angeles	11.8	82.8	5.4	20.1	64	2.8	0.4	9.3	3.4
6061022002	8.66	10.14	10-15%	6481 Placer	10.5	74.4	15.1	7.9	86.7	0.3	0.9	0.8	3.4
6097152501	8.66	10.13	10-15%	4178 Sonoma	12.8	77.8	9.4	16.8	72.1	1.8	0.9	4.8	3.5
6037670201	8.65	10.11	10-15%	3852 Los Angeles	10.1	67.3	22.6	8.7	68.5	1.6	0	16.5	4.6
6073009703	8.65	10.10	10-15%	3446 San Diego	9.9	70.5	19.6	13.9	76.8	2.3	0.4	3.5	3.2
6009000503	8.65	10.09	10-15%	2330 Calaveras	7.3	63.3	29.4	5.8	90.3	0.4	0.6	1.1	1.8
6059001602	8.65	10.08	10-15%	4687 Orange	8.8	70.8	20.4	12.3	61.1	1	0.2	22.6	2.9
6079010002	8.65	10.06	10-15%	3030 San Luis Obispo	11	72.2	16.8	10.2	84.2	0.5	1.3	1.2	2.6

6073019808	8.63	10.05	10-15%	4321 San Diego	7.3	45.3	47.4	10.1	80.9	1.8	0.1	5	2.1
6037480702	8.63	10.04	10-15%	4460 Los Angeles	10.3	73.1	16.6	17.1	33.4	2.8	0.1	42.4	4.3
6075015802	8.61	10.03	10-15%	2965 San Francisco	4.6	86.8	8.6	10.2	64.5	11.8	0.3	8.7	4.5
6065047201	8.61	10.01	10-15%	1958 Riverside	7.6	44.4	48	30.5	66.5	0.4	0.8	0.5	1.3
6081608900	8.60	10.00	10-15%	6556 San Mateo	11.2	73.4	15.4	11.4	58.9	1.4	0.2	23.4	4.7
6037265420	8.60	9.99	5-10%	1811 Los Angeles	12	68.7	19.3	4.2	77.9	1.7	0	12.7	3.5
6017030902	8.60	9.98	5-10%	4687 El Dorado	8.2	73.9	17.9	8.8	84.3	0.4	2.1	1.6	2.9
6081605300	8.59	9.96	5-10%	4602 San Mateo	13	74	13	12.5	67	1.1	0.2	15.6	3.6
6013355301	8.59	9.95	5-10%	7833 Contra Costa	12.3	75.4	12.3	13.7	65.4	1.8	0.2	14.2	4.7
6111000902	8.59	9.94	5-10%	2026 Ventura	9.1	71.8	19.1	15.5	80.6	0.6	0.4	1.2	1.7
6013345101	8.59	9.93	5-10%	5730 Contra Costa	14.3	75.4	10.3	13.7	59.1	2.5	0.1	20.2	4.4
6037920015	8.59	9.91	5-10%	6353 Los Angeles	15.8	79.1	5.1	19.1	65.3	2.7	0.1	9.4	3.5
6073017401	8.58	9.90	5-10%	5355 San Diego	9.3	81.1	9.6	7	85.9	0.4	0.5	3.1	3.1
6073017020	8.58	9.89	5-10%	3694 San Diego	9.6	72.7	17.7	8.1	83.4	0.9	0.2	5.1	2.3
6073020801	8.57	9.88	5-10%	5230 San Diego	8.9	78.3	12.8	13.3	81.1	1.5	0.5	2	1.6
6075031000	8.57	9.86	5-10%	3494 San Francisco	10.2	73	16.8	10.6	49.3	2.8	0.2	32.7	4.3
6059032056	8.57	9.85	5-10%	7072 Orange	17.3	76.5	6.2	13.7	68.6	1.4	0.1	12.2	4
6105000400	8.57	9.84	5-10%	975 Trinity	9	74	17	4.3	84.5	0.1	5.2	0.2	5.6
6085502908	8.56	9.82	5-10%	6683 Santa Clara	14.9	74.1	11	20.4	56.7	2.6	0.3	15.9	4.1
6081611400	8.56	9.81	5-10%	4237 San Mateo	9.2	67.5	23.3	4.4	77.7	1.5	0	13.6	2.7
6105000101	8.56	9.80	5-10%	2867 Trinity	8.2	69.2	22.6	6.7	86.1	0.3	2.4	1.2	3.3
6073008362	8.55	9.79	5-10%	3141 San Diego	8	80.1	11.9	10.7	64.8	1.3	0.1	19.7	3.4
6013325000	8.53	9.77	5-10%	5514 Contra Costa	12.5	71.5	16	10.9	76.2	1.8	0.2	6.5	4.4
6061023900	8.53	9.76	5-10%	3100 Placer	17.1	72.9	10	18	72.6	1.3	1	3.7	3.4
6023000700	8.52	9.75	5-10%	5360 Humboldt	11.4	68.2	20.4	7.6	82.5	0.8	2.5	2.6	3.9
6087120400	8.51	9.74	5-10%	4993 Santa Cruz	9.9	81.8	8.3	8.3	84.8	1	0.4	1.7	3.8
6085509902	8.51	9.72	5-10%	4838 Santa Clara	12	66.4	21.6	8.1	61.8	0.8	0.3	24.7	4.3
6059021823	8.50	9.71	5-10%	3299 Orange	12.6	76.7	10.7	15.6	67.8	1.2	0.2	12.1	3.1
6017030901	8.49	9.70	5-10%	3020 El Dorado	8.9	73.6	17.5	6.5	87.8	0.2	1.2	1.2	3.1
6061021902	8.49	9.69	5-10%	4454 Placer	8.3	73.2	18.5	5.4	89.9	0.2	0.5	1.1	2.9
6059032055	8.48	9.67	5-10%	3884 Orange	16	79.1	4.9	34.1	52.2	1.7	0.2	8.9	2.9
6067008506	8.48	9.66	5-10%	2520 Sacramento	10.6	71.5	17.9	7.9	60.5	2.3	0.6	25.2	3.5
6085502601	8.48	9.65	5-10%	2626 Santa Clara	10.4	62.4	27.2	11.5	75	1	0.2	9.1	3.2
6037401001	8.48	9.64	5-10%	3140 Los Angeles	11.3	71.8	16.9	18.6	72.9	0.2	0.1	5.8	2.4
6059021829	8.47	9.62	5-10%	5329 Orange	8.2	76.8	15	10.4	66.4	1.1	0.1	19.8	2.2
6113010505	8.46	9.61	5-10%	4807 Yolo	13.6	78.8	7.6	12	62.9	1.7	0.4	19	4
6085511704	8.45	9.60	5-10%	4520 Santa Clara	8.6	68.5	22.9	3	66.1	0.5	0	26.3	4
6073017808	8.45	9.59	5-10%	5975 San Diego	12.3	67.1	20.6	6.1	81.8	0.7	0.2	7.5	3.7
6065045109	8.45	9.57	5-10%	3831 Riverside	11.3	78.2	10.5	41.9	52.9	1.4	0.3	1.5	2
6017030809	8.45	9.56	5-10%	2447 El Dorado	12.2	71.5	16.3	10.7	83.7	0.7	0.7	1.4	2.9
6111007507	8.44	9.55	5-10%	6958 Ventura	13.5	76.9	9.6	8.7	76.9	1.3	0.2	9.7	3.2
6085510600	8.44	9.53	5-10%	6139 Santa Clara	11.6	73.2	15.2	10.3	56.2	1.5	0.2	28.7	3.2
6037460100	8.43	9.52	5-10%	5793 Los Angeles	9.9	71.4	18.7	12.1	64.7	12.7	0.2	6.2	4.1
6073017019	8.43	9.51	5-10%	5883 San Diego	5.8	50	44.2	5.4	85.9	1.2	0.3	5.1	2.2
6073017110	8.43	9.50	5-10%	10622 San Diego	17.4	74.4	8.2	14.6	72.7	1.4	0.3	7.1	3.9
6073016811	8.42	9.48	5-10%	4374 San Diego	10.8	76.1	13.1	13.9	80.4	0.8	0.5	2	2.4
6075030202	8.42	9.47	5-10%	4313 San Francisco	7.4	83.1	9.5	7.9	54.1	1.9	0.1	31.3	4.6
6017030504	8.42	9.46	5-10%	2912 El Dorado	8.9	79.5	11.6	9.3	86.5	0.5	0.4	2	1.3
6059052428	8.41	9.45	5-10%	6217 Orange	13.5	81.6	4.9	13.5	71.1	1.2	0.2	9.6	4.4
6111007510	8.41	9.43	5-10%	6565 Ventura	13.6	76.6	9.8	5.6	74.9	1.1	0	15.4	2.9
6061022900	8.40	9.42	5-10%	5175 Placer	18.9	77.3	3.8	14.5	64.7	2	0.4	12.8	5.6
6013345102	8.39	9.41	5-10%	3895 Contra Costa	14.2	76.8	9	12.8	67.4	2.2	0.1	13.9	3.7
6059075603	8.39	9.40	5-10%	3790 Orange	13.4	71.6	15	18.9	70.7	0.6	0.1	7	2.5
6065045116	8.38	9.38	5-10%	1492 Riverside	7.7	64.3	28	16	77.1	2.3	0.1	2.7	1.7
6007000901	8.37	9.37	5-10%	2142 Butte	12	76.7	11.3	11.8	80.4	0.5	0.8	3.9	2.6
6037460000	8.36	9.36	5-10%	4851 Los Angeles	10.5	69.3	20.2	12.3	65.2	5.1	0	13.7	3.6
6061023300	8.36	9.35	5-10%	4365 Placer	22.2	74	3.8	14.9	65.7	2.4	0.4	11.8	4.7
6081610304	8.36	9.33	5-10%	4023 San Mateo	12.5	73.1	14.4	10.2	54.7	2.6	0.1	28.4	4.1
6085503332	8.36	9.32	5-10%	5363 Santa Clara	7	47.1	45.9	8.7	64.3	1.1	0.1	22.9	3
6059099238	8.33	9.31	5-10%	4031 Orange	10.8	68.9	20.3	8.9	70.4	0.5	0.3	16.9	2.9
6079013000	8.33	9.29	5-10%	2539 San Luis Obispo	9.2	73.4	17.4	21.5	73.2	0.2	0.5	3.4	1.3
6007000904	8.32	9.28	5-10%	6071 Butte	9.8	69.2	21	11.2	80.3	1.4	0.8	3.9	2.4
6061021043	8.32	9.27	5-10%	3355 Placer	13	80.1	6.9	9.5	77.3	2.3	0.1	7	3.8
6085510803	8.31	9.26	5-10%	2558 Santa Clara	12.7	69.2	18.1	5.9	52.1	1.1	0.1	36.4	4.6
6073015602	8.30	9.24	5-10%	2536 San Diego	8.3	74.9	16.8	14.2	77.8	1.4	0.8	2.2	3.5
6073015405	8.30	9.23	5-10%	5765 San Diego	10.7	74.5	14.8	15.3	77.1	1.4	0.3	2.7	3.2
6059075607	8.30	9.22	5-10%	6065 Orange	10.8	81.1	8.1	11.7	53.8	2	0.1	28.6	3.8
6037670326	8.30	9.21	5-10%	3807 Los Angeles	8.5	64.7	26.8	4.9	68	1.7	0.1	22.5	2.9
6087120500	8.29	9.19	5-10%	5687 Santa Cruz	8.8	80.5	10.7	6.9	86.5	0.4	0.3	2.8	3.1
6059062638	8.28	9.18	5-10%	6161 Orange	16.1	80.3	3.6	15.7	59.1	1.4	0.1	18.6	5.1
6113010511	8.27	9.17	5-10%	3135 Yolo	6.8	75.9	17.3	6.6	64.8	1.2	0.3	23.8	3.3
6073020708	8.27	9.16	5-10%	3437 San Diego	11.9	75.2	12.9	20.6	64	1.7	0.2	9.9	3.6
6037651302	8.26	9.14	5-10%	6311 Los Angeles	11.2	69.1	19.7	9.6	67.5	0.8	0.2	17.7	4.2
6089011403	8.25	9.13	5-10%	2804 Shasta	11.7	71.9	16.4	9	80.2	0.8	1.2	4.9	3.9
6085512030	8.24	9.12	5-10%	3074 Santa Clara	12.3	76.3	11.4	23.5	53.2	2.3	0.2	16.8	4.1
6075030101	8.24	9.11	5-10%	4233 San Francisco	6.8	86.2	7	7.8	62.9	2	0.2	22.2	4.8
6059062634	8.23	9.09	5-10%	5466 Orange	14.5	79.9	5.6	12.6	67.6	1.9	0.2	13.6	4
6081612500	8.23	9.08	5-10%	4153 San Mateo	12.1	74.3	13.6	7.3	74.5	1.7	0.1	12.1	4.2
6001404700	8.22	9.07	5-10%	1954 Alameda	12.9	71.6	15.5	6	71.4	8	0.3	9.4	4.9
6037670701	8.21	9.06	5-10%	6882 Los Angeles	10.2	67.9	21.9	18.5	57.4	4.8	0.1	15.8	3.4
6073008512	8.21	9.04	5-10%	4193 San Diego	10.2	69.8	20	12.8	74.6	1.6	0.5	7.1	3.3
6111005901	8.21	9.03	5-10%	6716 Ventura	11	76.3	12.7	11.2	79.8	1	0.2	4.6	3.3
6073017801	8.20	9.02	5-10%	6539 San Diego	9.3	77.6	13.1	15.9	76.1	1	0.4	4.2	2.4
6081612600	8.20	9.00	5-10%	4156 San Mateo	11.1	73.2	15.7	6.7	76.3	0.6	0.1	12.5	3.8
6071002011	8.20	8.99	5-10%	4006 San Bernardino	9.3	77	13.7	22.6	66.5	3.2	0.4	4.6	2.6
6067008513	8.19	8.98	5-10%	2793 Sacramento	22	73.8	4.2	10.5	56.2	2	0.3	25.6	5.4
6041108200	8.19	8.97	5-10%	6836 Marin	10.3	61.1	28.6	19.4	65.9	2.2	0.1	9.5	2.9
6073017056	8.19	8.95	5-10%	4144 San Diego	13.7	79.3	7	10.7	56.7	3.7	0.2	23.1	5.6
6059032049	8.18	8.94	5-10%	9368 Orange	16	80.4	3.6	13	68.3	1.6	0.2	12.9	4
6083001304	8.18	8.93	5-10%	7522 Santa Barbara	9.3	75	15.7	25.6	66.8	0.9	0.2	4.1	2.4
6001428302	8.17	8.92	5-10%	7074 Alameda	10.9	72.8	16.3	5.4	44.2	2.4	0.1	43.4	4.5
6097151306	8.17	8.90	5-10%	3636 Sonoma	11.9	75.3	12.8	19.3	69.1	2.1	0.7	4.6	4.2
6073017010	8.17	8.89	5-10%	3152 San Diego	12.8	78.1	9.1	15	72.7	1	0.4	8	2.9
6081603100	8.16	8.88	5-10%	3275 San Mateo	12.2	76.6	11.2	13.3	68.8	0.8	0.2	11.8	5.2
6073017601	8.16	8.87	5-10%	4941 San Diego	9.5	58.4	32.1	6.5	86.8	0.7	0.1	3.6	2.2
6001451102	8.16	8.85	5-10%	4011 Alameda	12.8	74.9	12.3	9.1	77.2	0.9	0.3	9.2	3.4
6097154302	8.15	8.84	5-10%	3747 Sonoma	7.2	74	18.8	8.3	85.4	0.4	0.6	2.2	3.1
6037800102	8.15	8.83	5-10%	7078 Los Angeles	11.3	76.9	11.8	6.4	85	1.4	0.4	3.7	3.2
6059099514	8.15	8.82	5-10%	5453 Orange	8.1	64.6	27.3	7.4	76.6	0.2	0.1	12.5	3.2
6061021037	8.14	8.80	5-10%	2135 Placer	11.8	67.2	21	13.4	73.2	2	0.5	7.4	3.5
6085502903	8.14	8.79	5-10%	5075 Santa Clara	13.5	67.9	18.6	16.1	69.7	1.2	0.3	9.2	3.5
6001421800	8.14	8.78	5-10%	2007 Alameda	10.8	73.1	16.1	5	76.1	2.7	0.3	10.9	5
6061020402	8.13	8.77	5-10%	3396 Placer	9.5	69.8	20.7	7.4	87.1	0.2	0.6	1.6	3
6075017000	8.13	8.75	5-10%	3689 San Francisco	5	81.7	13.3	7.7	79	1.3	0.1	8.6	3.3
6001420300	8.13	8.74	5-10%	4571 Alameda	12.3	75.5	12.2	9.2	43.9	3.8	0.1	37.3	5.6
6081609601	8.13	8.73	5-10%	2944 San Mateo	12	71.9	16.1	7.1	72.8	1	0.2	14.8	4.2
6001404101	8.12	8.71	5-10%	2929 Alameda	8	78.3	13.7	9.4	67.6	6.2	0.1	11.7	5.1
6079011704	8.12	8.70	5-10%	3336 San Luis Obispo	6.9	73.9	19.2	10.4	85	0.8	0.4	1.5	1.9
6037621400	8.11	8.69	5-10%	4414 Los Angeles	11.5	76.5	12	11.1	72.9	1.2	0.4	9.1	5.3
6111005801	8.11	8.68	5-10%	5149 Ventura	15.6	74.8	9.6	9.1	75.7	0.9	0.2	10.7	3.4
6085507600	8.11	8.66	5-10%	5563 Santa Clara	8.2	73.2	18.6	2.6	51.5	0.3	0.1	42.2	3.4
6073018000	8.10	8.65	5-10%	3711 San Diego	5.1	80.5	14.4	11.7	80.7	1.2	0.3	3.9	2.3
6017030502	8.10	8.64	5-10%	2641 El Dorado	8.8	82	9.2	7.1	89.2	0.4	0.3	1.7	1.3
6097153404	8.10	8.63	5-10%	4011 Sonoma	8.8	73.5	17.7	9.5	84.5	0.8	0.5	1.9	2.8
6073008306	8.10	8.61	5-10%	2997 San Diego	9.4	64.2	26.4	6.3	79.9	0.7	0.2	8.9	3.9
6073013701	8.09	8.60	5-10%	2352 San Diego	10.1	70.2	19.7	15.9	72.6	3.6	0.2	4.8	3
6085507703	8.09	8.59	5-10%	7706 Santa Clara	12.2	69.9	17.9	3.3	41.3	0.5	0.2	50.9	3.8
6105000200	8.09	8.58	5-10%	2281 Trinity	8.6	71	20.4	6.8	82.4	0.1	6	0.3	4.4
6061020710	8.09	8.56	5-10%	4387 Placer	10.6	73.4	16	10.2	80.7	0.8	0.3	4.6	3.4
6037901213	8.07	8.55	5-10%	3553 Los Angeles	9.6	78.6	11.8	14.9	68.4	7.4	0.5	5.2	3.7
6037920338	8.07	8.54	5-10%	5721 Los Angeles	16	78.1	5.9	14	59.4	2.5	0.3	20.7	3.2
6055201800	8.07	8.53	5-10%	1806 Napa	8.9	79.1	12	18	77.6	0.5	0.9	1	2
6085511914	8.06	8.51	5-10%	5684 Santa Clara	11.9	69.6	18.5	7.7	65.9	1.2	0.2	20.8	4.3

6075033000	8.06	8.50	5-10%	7764 San Francisco	9	74	17	6.5	36.8	1	0.1	52.8	2.9
6039000104	8.05	8.49	5-10%	4773 Madera	9.1	65.4	25.5	13.5	79.7	0.5	2.1	1.6	2.7
6085511905	8.05	8.48	5-10%	3129 Santa Clara	13.3	70.6	16.1	7.1	53.9	1	0.1	33.3	4.7
6037800202	8.03	8.46	5-10%	6319 Los Angeles	14.8	75	10.2	5.6	81.6	1.6	0.1	8	3.1
6079011600	8.02	8.45	5-10%	4292 San Luis Obispo	7.5	67.4	25.1	5.8	89.8	0.4	0.2	2.1	1.7
6065045119	8.02	8.44	5-10%	2811 Riverside	10	77.1	12.9	29.6	61.5	1.4	0.4	5	2
6073007903	8.01	8.42	5-10%	4487 San Diego	4.3	88.5	7.2	11.6	80.8	1	0.1	3.9	2.6
6059032023	8.00	8.41	5-10%	13544 Orange	20.4	70.8	8.8	12.6	78.1	0.7	0.3	5.3	3
6071940100	7.99	8.40	5-10%	1520 San Bernardino	5.9	56.1	38	11.6	80.5	1	3.1	0.2	3.6
6089011401	7.98	8.39	5-10%	3971 Shasta	13.1	72	14.9	8.3	82.9	0.6	1.7	3.4	3.2
6085509401	7.97	8.37	5-10%	3212 Santa Clara	11.9	79.6	8.5	15.9	41.1	2.2	0.2	37.7	2.9
6075012902	7.97	8.36	5-10%	3376 San Francisco	5.1	82.5	12.4	7	75	1.1	0.1	13.1	3.7
6037139702	7.97	8.35	5-10%	6250 Los Angeles	12.2	64.5	23.3	4.4	85.8	1.3	0.1	4.5	4
6061023200	7.97	8.34	5-10%	4960 Placer	23.4	72.8	3.8	13.2	65.2	2	0.5	14.2	5
6111007201	7.97	8.32	5-10%	3429 Ventura	9	74.1	16.9	9.4	83.2	0.6	0.3	3.7	2.8
6075030900	7.96	8.31	5-10%	6581 San Francisco	9.9	70.7	19.4	7.3	50.5	3.8	0.2	35	3.1
6097150100	7.96	8.30	5-10%	2322 Sonoma	9.1	71	19.9	16.6	78.7	0.1	0.3	2	2.3
6057000103	7.94	8.29	5-10%	7893 Nevada	8.9	70.4	20.7	5.8	89.8	0.3	0.7	1.2	2.3
6073020810	7.94	8.27	5-10%	5266 San Diego	12.3	79.1	8.6	12.1	82.7	0.7	0.5	1.4	2.6
6089010807	7.93	8.26	5-10%	4362 Shasta	10.3	68.9	20.8	6.1	87.6	0.3	1.3	1.9	2.9
6079011902	7.92	8.25	5-10%	8245 San Luis Obispo	12	70.9	17.1	21.7	70.1	1	0.5	3.3	3.4
6019005525	7.92	8.24	5-10%	1244 Fresno	11.4	74.6	14	15.8	71	1.4	1	8	2.9
6059062644	7.91	8.22	5-10%	8249 Orange	12.2	74.5	13.3	6.3	82.5	0.8	0.1	7.8	2.6
6037651401	7.90	8.21	5-10%	2614 Los Angeles	9.8	67.5	22.7	9.6	60.5	1.8	0.2	24.3	3.6
6097151800	7.88	8.20	5-10%	5219 Sonoma	11.1	74.5	14.4	12	79.2	1.2	0.9	3.3	3.4
6059042324	7.88	8.19	5-10%	4241 Orange	5.3	64	30.7	7.1	84.4	0.9	0.4	5.3	2
6081609500	7.88	8.17	5-10%	4829 San Mateo	14.5	71.6	13.9	11	69.7	0.4	0.1	14.3	4.6
6037261102	7.88	8.16	5-10%	4362 Los Angeles	12	67	21	4.3	83.4	2	0	6.2	4
6073017052	7.88	8.15	5-10%	4796 San Diego	10.4	73.7	15.9	9.3	57.7	1.8	0.2	27.5	3.6
6037574602	7.87	8.13	5-10%	1277 Los Angeles	6.6	57.2	36.2	8	67	4.5	0.4	17.2	3
6013360102	7.86	8.12	5-10%	4326 Contra Costa	9	75.7	15.3	15.3	37.4	12.9	0.4	28.8	5.1
6075030201	7.85	8.11	5-10%	3928 San Francisco	7.1	80.7	12.2	7.3	52.7	1	0.1	34.5	4.2
6073017811	7.85	8.10	5-10%	6355 San Diego	13	72.8	14.2	8.5	77.7	0.8	0.1	9.7	3.2
6059075605	7.84	8.08	5-10%	5776 Orange	11.9	75.5	12.6	11.3	67.7	0.8	0.1	16.9	3.3
6073013410	7.84	8.07	5-10%	7073 San Diego	15.3	74.5	10.2	41	31.6	3.9	0.2	19.2	4.1
6089011802	7.84	8.06	5-10%	2442 Shasta	7.9	73.7	18.4	5.3	90.2	0.2	1.1	1.2	2.1
6081608013	7.83	8.05	5-10%	4049 San Mateo	14.1	77.7	8.2	6	41.5	2.7	0	44.7	5
6037143901	7.81	8.03	5-10%	4068 Los Angeles	12.6	71.4	16	6	83	1.6	0	5.9	3.5
6073008101	7.80	8.02	5-10%	4009 San Diego	6.9	77.7	15.4	9.6	82.9	0.7	0.1	4	2.6
6083001906	7.79	8.01	5-10%	5870 Santa Barbara	9.6	71.1	19.3	16.8	77.3	0.3	2.7	1.1	1.9
6065044928	7.79	8.00	5-10%	3443 Riverside	4.5	44.8	50.7	7.8	88.1	0.6	0.2	2.1	1.2
6083001706	7.79	7.98	5-10%	4693 Santa Barbara	8.5	71.6	19.9	21.8	73.6	0.5	0.2	2.1	1.7
6057001204	7.78	7.97	5-10%	2832 Nevada	12	79.3	8.7	7.5	87.4	0.5	0.4	2.2	2.1
6061020605	7.78	7.96	5-10%	5826 Placer	10.8	76.2	13	6	81.8	0.8	0.4	7.7	3.3
6073008356	7.78	7.95	5-10%	3629 San Diego	12.1	77.9	10	9.8	36.2	3.6	0.4	45.6	4.4
6085510900	7.78	7.93	5-10%	5354 Santa Clara	13	72.6	14.4	7	58.1	1.6	0.1	28.8	4.4
6037460502	7.78	7.92	5-10%	4417 Los Angeles	11.9	74.8	13.3	6.3	61.5	0.4	0	28.5	3.3
6013334006	7.77	7.91	5-10%	4767 Contra Costa	11.7	76.1	12.2	12	60	1.7	0.4	20.1	5.9
6059063009	7.77	7.90	5-10%	1674 Orange	12	66	22	6.4	82.7	0.4	0.7	8	1.8
6097151601	7.76	7.88	5-10%	2901 Sonoma	1.6	33.9	64.5	5.8	90.7	0.6	0.6	1.8	0.6
6083002926	7.76	7.87	5-10%	5328 Santa Barbara	2.1	93.9	4	27.4	55.3	1.7	0.2	11.2	4.1
6037701201	7.76	7.86	5-10%	4433 Los Angeles	13.4	68	18.6	3.5	85.5	0.7	0	7.9	2.5
6079011701	7.76	7.84	5-10%	4301 San Luis Obispo	6.6	62.2	31.2	8.5	85	0.5	0.4	3.6	2.1
6007000103	7.76	7.83	5-10%	3902 Butte	16.8	77	6.2	16.5	74.2	1.1	0.8	3.6	3.8
6001404000	7.75	7.82	5-10%	2819 Alameda	6.4	85	8.6	10.8	57.3	14.2	0.2	11.6	5.8
6111007609	7.74	7.81	5-10%	2590 Ventura	10.9	83.7	5.4	12.9	75.7	1.5	0.2	6.1	3.6
6059099217	7.74	7.79	5-10%	2354 Orange	9.6	70.9	19.5	8.5	79.3	1	0.1	8.5	2.5
6083002924	7.73	7.78	5-10%	5833 Santa Barbara	1.1	98.7	0.2	19.9	61	1.5	0.2	12.9	4.5
6037621104	7.73	7.77	5-10%	6649 Los Angeles	8.1	86.1	5.8	8.9	80.3	1.6	0.2	6.2	2.9
6037430501	7.72	7.76	5-10%	4172 Los Angeles	10.3	72.5	17.2	13.9	74	1.4	0.2	7.7	2.8
6081606900	7.72	7.74	5-10%	2470 San Mateo	12	69.3	18.7	9.4	58.8	1.9	0.4	23.1	6.5
6073020016	7.71	7.73	5-10%	9314 San Diego	14.1	75.3	10.6	8.1	82	0.4	0.1	6.5	2.8
6073018801	7.71	7.72	5-10%	3614 San Diego	9	69	22	18.9	75.3	0.7	0.4	2.2	2.4
6073016609	7.69	7.71	5-10%	5227 San Diego	13.5	79.2	7.3	14.3	77.8	1.2	0.6	2.3	3.8
6059042112	7.69	7.69	5-10%	6858 Orange	16	75.4	8.6	13	77.3	0.7	0.2	5.3	3.6
6073017042	7.68	7.68	5-10%	7869 San Diego	17.8	78	4.2	8.2	52	2.1	0.2	32.7	4.8
6097150204	7.66	7.67	5-10%	3678 Sonoma	8.7	67.7	23.6	14.4	80.4	0.3	0.3	3	1.6
6073021204	7.65	7.66	5-10%	5239 San Diego	8.7	76.5	14.8	11.3	83.3	0.8	0.8	2	1.8
6059032030	7.65	7.64	5-10%	3819 Orange	10.3	77.1	12.6	21.7	64.8	1.2	0.3	8.9	3.1
6073008501	7.64	7.63	5-10%	5271 San Diego	11.3	75	13.7	16.7	72.9	1.2	0.5	5.3	3.5
6111007508	7.63	7.62	5-10%	3722 Ventura	12.2	74.6	13.2	17.7	71.8	1.5	0.2	6.7	2.2
6037400404	7.62	7.60	5-10%	4453 Los Angeles	8.7	72.8	18.5	15.1	75.2	0.8	0.1	6.6	2.2
6073017029	7.62	7.59	5-10%	8823 San Diego	14.6	71.3	14.1	7	76.1	1.1	0.2	11.9	3.8
6061023000	7.62	7.58	5-10%	3191 Placer	19.7	75.7	4.6	11.8	70.9	1.3	0.3	10.5	5.3
6065045125	7.61	7.57	5-10%	3017 Riverside	4.7	49.2	46.1	9.5	87.5	0.4	0.1	1.4	1.1
6037464200	7.61	7.55	5-10%	5937 Los Angeles	10.2	72.6	17.2	4.9	28.3	0.1	0	64.1	2.5
6075032700	7.61	7.54	5-10%	6572 San Francisco	8.3	75.3	16.4	5.1	34.4	1	0.1	55.8	3.6
6073013416	7.59	7.53	5-10%	3780 San Diego	14.1	72.8	13.1	39.3	40.3	4.7	0.3	11.6	3.7
6065940600	7.57	7.52	5-10%	3026 Riverside	4.7	46.9	48.4	9	84.2	0.9	0.8	3.2	1.9
6041121200	7.57	7.50	5-10%	5601 Marin	12.6	72.2	15.2	9.2	75.8	2.1	0.2	8	4.7
6073020014	7.56	7.49	5-10%	7006 San Diego	12.3	72.5	15.2	9.1	78.7	1.7	0.3	7.3	2.9
6037620400	7.56	7.48	5-10%	5090 Los Angeles	12.6	71.6	15.8	8.4	73.9	1.1	0.2	11.7	4.7
6085506202	7.55	7.47	5-10%	6959 Santa Clara	13.7	70.1	16.2	8.4	48	1.7	0.2	37.8	3.9
6073008346	7.55	7.45	5-10%	4615 San Diego	12.9	78.6	8.5	7.9	44.6	1.5	0.1	41.8	4.1
6037910813	7.54	7.44	5-10%	3535 Los Angeles	8.7	77.9	13.4	18.7	75.2	1.5	0.7	1.8	2.1
6059032034	7.52	7.43	5-10%	5898 Orange	11	82.9	6.1	9.2	75.2	1.3	0.3	10.1	3.9
6085503312	7.52	7.42	5-10%	3365 Santa Clara	11.7	76.8	11.5	37.6	27.3	4.4	0.3	27.1	3.4
6081607100	7.51	7.40	5-10%	2879 San Mateo	12.4	69.2	18.4	8.4	67.4	1.4	0.1	18.4	4.3
6041131100	7.51	7.39	5-10%	1038 Marin	9.2	75.5	15.3	6.6	84.9	1	0	3.9	3.7
6013345105	7.51	7.38	5-10%	6223 Contra Costa	13.4	73.9	12.7	8.8	77.2	0.7	0.1	9.2	3.9
6113010605	7.50	7.37	5-10%	3559 Yolo	13.9	80.9	5.2	11.7	54.6	1.9	0.3	25.7	5.7
6017031503	7.49	7.35	5-10%	2810 El Dorado	8.3	72.6	19.1	7.4	87.8	0.1	0.9	1.5	2.3
6041102202	7.47	7.34	5-10%	5885 Marin	12.1	72.4	15.5	19	68.5	2.1	0.3	7.1	3
6097150500	7.46	7.33	5-10%	5283 Sonoma	6.8	76	17.2	11.7	81.9	1.1	0.2	2.7	2.4
6081605500	7.46	7.31	5-10%	4914 San Mateo	9.5	77.2	13.3	15.2	61.6	1.7	0.2	16.8	4.5
6059021830	7.45	7.30	5-10%	5862 Orange	9.5	80.1	10.4	11.9	69.4	0.8	0.2	14.4	3.3
6035040500	7.42	7.29	5-10%	3213 Lassen	11.7	75.1	13.2	8	86.9	0.5	1.6	0.8	2.3
6037262200	7.41	7.28	5-10%	4675 Los Angeles	10.6	68.5	20.9	4.7	79.6	2	0	9.6	4.1
6075042800	7.39	7.26	5-10%	2376 San Francisco	12.6	67	20.4	3.3	71.9	0.7	0.1	19.8	4.2
6001430400	7.39	7.25	5-10%	2046 Alameda	9.5	70.6	19.9	11.6	65.6	2.8	0.1	14.5	5.3
6037650702	7.38	7.24	5-10%	4590 Los Angeles	11.7	73.8	14.5	11.9	60.3	0.5	0.1	22.5	4.7
6041123000	7.36	7.23	5-10%	2074 Marin	12.3	56	31.7	3.5	90.9	0.1	0	3.1	2.4
6073002001	7.35	7.21	5-10%	3354 San Diego	9.3	70.2	20.5	9.8	82.4	1.6	0.3	3.4	2.6
6073017036	7.35	7.20	5-10%	3276 San Diego	12.4	78.9	8.7	11.1	56.1	3.2	0.4	22.8	6.3
6019005518	7.35	7.19	5-10%	2753 Fresno	20.4	72.3	7.3	17.3	65	2.5	0.7	11.5	3
6037463300	7.35	7.18	5-10%	2041 Los Angeles	11.2	74.9	13.9	17.7	54.6	2.8	0	21.4	3.4
6019005503	7.35	7.16	5-10%	4254 Fresno	10.1	71.7	18.2	13.5	69.6	2	0.3	12.2	2.4
6085507401	7.34	7.15	5-10%	5624 Santa Clara	10.4	70.3	19.3	2.4	39.6	0.2	0.1	54.8	2.9
6075013000	7.33	7.14	5-10%	4044 San Francisco	5.5	82.1	12.4	5.6	80.9	0.6	0.1	10.3	2.5
6059062645	7.32	7.13	5-10%	6084 Orange	10.5	74.3	15.2	5.2	76.6	0.5	0.1	14	3.7
6053010701	7.30	7.11	5-10%	6769 Monterey	13	73.8	13.2	12.5	74.4	1.2	0.3	7.8	3.7
6013355115	7.30	7.10	5-10%	4443 Contra Costa	18.9	77.3	3.8	10.9	32.7	9.6	0.3	40.4	6.2
6111007402	7.29	7.09	5-10%	6305 Ventura	7.7	74.2	18.1	5.8	83.6	1.1	0	7.5	2
6017030801	7.29	7.08	5-10%	4011 El Dorado	10.3	74.8	14.9	8.8	84.7	0.4	0.8	2.4	2.9
6079010504	7.29	7.06	5-10%	2592 San Luis Obispo	7.3	67.5	25.2	8	86.8	0.2	0.3	2.2	2.4
6073017109	7.28	7.05	5-10%	6650 San Diego	15.1	80.4	4.5	9.6	78.6	0.6	0.1	6.8	4.2
6013338203	7.28	7.04	5-10%	4564 Contra Costa	8.5	83	8.5	9.5	64.9	2.9	0.2	17.8	4.6
6085511909	7.27	7.02	5-10%	7997 Santa Clara	11.8	75.9	12.3	4.6	49.3	0.3	0.2	40.9	4.6
6085506803	7.27	7.01	5-10%	6883 Santa Clara	14.7	73.4	11.9	19.2	62.2	1	0.1	13.4	4.1
6079010101	7.27	7.00	5-10%	1843 San Luis Obispo	9.2	73.7	17.1	15.1	80.2	1.3	0.4	1.1	1.8
6061020602	7.27	6.99	5-10%	6970 Placer	9.5	73.2	17.3	7.3	85.4	0.6	0.7	3.2	2.7
6083001208	7.26	6.97	5-10%	4096 Santa Barbara	8.7	76.2	15.1	16.5	73.3	1.1	0.4	5.7	3
6037670411	7.25	6.96	5-10%	4427 Los Angeles	12.2	66.1	21.7	6.8	58.1	1.1	0.1	29.2	4.7

6073008347	7.24	6.95	5-10%	6358 San Diego	12	78.4	9.6	12	36.2	2.7	0.1	43.9	5
6059042331	7.24	6.94	5-10%	5215 Orange	10.5	79	10.5	18.5	69.1	0.8	0.3	7.4	3.9
6073008366	7.23	6.92	5-10%	5881 San Diego	13.6	81.1	5.3	7.3	48.6	1.4	0.1	38.7	3.8
6073009504	7.23	6.91	5-10%	5914 San Diego	15.6	77.7	6.7	7.4	64.4	2.6	0.2	21.5	3.9
6081611200	7.20	6.90	5-10%	3005 San Mateo	14.5	70.1	15.4	21.5	68.1	1	0.2	6.7	2.5
6013390100	7.19	6.89	5-10%	2229 Contra Costa	11.6	67.2	21.2	5.6	64.7	4.2	0.1	19.5	5.8
6111006200	7.19	6.87	5-10%	3003 Ventura	7.5	73.1	19.4	5.1	84.2	0.7	0.1	7.1	2.8
6073009104	7.18	6.86	5-10%	2775 San Diego	10.3	69.1	20.6	12	81.3	0.5	0.1	3	3
6065044919	7.17	6.85	5-10%	4243 Riverside	0.8	30.3	68.9	3.5	93.8	0.7	0.2	1.1	0.7
6037194200	7.16	6.84	5-10%	3588 Los Angeles	9.2	78.7	12.1	6.7	83.9	1.9	0.1	3.9	3.4
6059042317	7.15	6.82	5-10%	3331 Orange	8.8	71.1	20.1	6.9	84.4	0.7	0.4	5.5	2.1
6059042337	7.15	6.81	5-10%	3639 Orange	10	78.8	11.2	9.3	78.4	1.2	0.2	7.7	3.2
6059075703	7.14	6.80	5-10%	4069 Orange	11.1	68.8	20.1	10.6	76.5	0.4	0.2	10	2.3
6059099237	7.14	6.79	5-10%	3583 Orange	11.1	73.9	15	10.4	74.1	0.6	0.3	10.9	3.8
6037460600	7.11	6.77	5-10%	4511 Los Angeles	10.1	74.9	15	5.7	71.2	0.4	0.1	19.4	3.3
6081608700	7.11	6.76	5-10%	6974 San Mateo	12.4	72.3	15.3	11.5	65.2	1.5	0.2	16.9	4.7
6013338204	7.11	6.75	5-10%	5662 Contra Costa	9.9	73.3	16.8	7.4	69.7	1.4	0.2	17.7	3.5
6037430200	7.11	6.73	5-10%	1292 Los Angeles	6.5	58.5	35	17.1	58.3	1.6	0	20.9	2.1
6083002906	7.11	6.72	5-10%	4016 Santa Barbara	8.8	71.5	19.7	21.1	68.6	1.1	0.3	6.4	2.5
6013338301	7.09	6.71	5-10%	2922 Contra Costa	9.5	62.8	27.7	5.5	75.3	0.5	0.2	15.9	2.6
6001450605	7.09	6.70	5-10%	3685 Alameda	13.4	71	15.6	7.2	76.5	1.1	0	12.5	2.7
6037262400	7.06	6.68	5-10%	3233 Los Angeles	11.2	64.7	24.1	4	85.3	1	0.1	6	3.6
6073017045	7.05	6.67	5-10%	2790 San Diego	14.5	79.8	5.7	6.6	60.5	1.9	0.6	25.9	4.4
6097153706	7.04	6.66	5-10%	4092 Sonoma	7.2	76.3	16.5	10.9	83.8	0.7	1	1.1	2.5
6081604600	7.03	6.65	5-10%	2599 San Mateo	10.2	66.6	23.2	7.2	43.2	0.3	0	45.9	3.3
6037460501	7.03	6.63	5-10%	5418 Los Angeles	9.2	72.9	17.9	5.9	62.6	0.5	0	28.2	2.9
6111005910	7.02	6.62	5-10%	1775 Ventura	10.3	78.1	11.6	10	81.7	1.2	0.1	4.2	2.9
6061023600	7.01	6.61	5-10%	4565 Placer	0.2	30.4	69.4	4.2	90.5	0.6	0.2	4	0.5
6037460700	7.01	6.60	5-10%	5034 Los Angeles	9	74	17	6.7	65.5	0.7	0	24.8	2.4
6087120900	7.00	6.58	5-10%	8360 Santa Cruz	12.1	77.2	10.7	11.2	78.1	1	0.3	5.2	4.1
6017030710	6.99	6.57	5-10%	4989 El Dorado	11.1	76.2	12.7	6.7	80.6	1.9	0.2	7.6	3.2
6081613200	6.98	6.56	5-10%	6494 San Mateo	12.1	63.1	24.8	4.6	86.7	0.3	0.1	5.9	2.3
6059042326	6.97	6.55	5-10%	4608 Orange	11.7	74.7	13.6	15.4	70.1	1.6	0.4	7.8	4.7
6085511916	6.96	6.53	5-10%	4669 Santa Clara	14.4	76.4	9.2	18.1	57.3	2.2	0.1	18.4	3.8
6067009406	6.95	6.52	5-10%	2390 Sacramento	9.9	77.1	13	21.9	71.3	0.9	1	2.8	2.1
6085503002	6.94	6.51	5-10%	3506 Santa Clara	13.5	67.7	18.8	22.5	60.8	1.9	0.1	10.9	3.7
6037620303	6.94	6.50	5-10%	4547 Los Angeles	16.7	70.5	12.8	6.2	82.9	0.4	0	6.4	4.1
6061021038	6.93	6.48	5-10%	7632 Placer	14.8	79.2	6	16.1	72.1	1.8	0.7	5.2	4.1
6089010804	6.93	6.47	5-10%	2745 Shasta	9.3	70.9	19.8	7.5	83	1.2	0.8	4.3	3.2
6061020502	6.92	6.46	5-10%	4103 Placer	9.8	69	21.2	5.8	86.1	0.8	1.1	3.1	3.1
6059063005	6.91	6.44	5-10%	1365 Orange	3.6	66.4	30	4.8	86.5	1	0.1	6.5	1.2
6037800332	6.90	6.43	5-10%	6665 Los Angeles	9.9	78.5	11.6	6.1	82.9	0.5	0	7.4	3
6081608023	6.90	6.42	5-10%	2549 San Mateo	14.5	68.4	17.1	5.7	42.6	1.4	0.1	45.5	4.7
6061021040	6.89	6.41	5-10%	3493 Placer	1.4	20.3	78.3	4.3	91.7	0.8	0.1	2.5	0.6
6085507906	6.89	6.39	5-10%	4460 Santa Clara	12.1	74.8	13.1	2.6	24.8	0.2	0.1	69.9	2.4
6037800326	6.88	6.38	5-10%	4972 Los Angeles	8.8	74.2	17	7.8	82.7	0.8	0.1	6.4	2.1
6111001700	6.88	6.37	5-10%	3531 Ventura	8.7	68.4	22.9	12.5	79.5	0.7	0.5	3.8	3
6059099308	6.87	6.36	5-10%	5847 Orange	11	71.2	17.8	7.3	70.6	0.3	0.1	18.9	2.8
6073017054	6.87	6.34	5-10%	5810 San Diego	9.9	70.9	19.2	8.8	76.4	1.5	0.2	9.4	3.7
6037138000	6.87	6.33	5-10%	4484 Los Angeles	11.2	72.5	16.3	7.8	80.4	2.4	0.2	5.8	3.5
6059062639	6.86	6.32	5-10%	6996 Orange	16.8	75.4	7.8	13.2	64.5	2.1	0.2	15.2	4.9
6073021304	6.86	6.31	5-10%	2616 San Diego	8	78.6	13.4	25	69.2	1.6	0.3	1.3	2.5
6017030601	6.84	6.29	5-10%	5044 El Dorado	9.7	73.7	16.6	6.1	89	0.3	0.7	0.9	2.9
6081608300	6.84	6.28	5-10%	3401 San Mateo	14.6	73.2	12.2	6.8	39.3	1.8	0.1	48.2	3.9
6041125000	6.83	6.27	5-10%	4262 Marin	13.1	69.5	17.4	6.2	75.1	2	0.2	12.4	4
6083002008	6.82	6.26	5-10%	6451 Santa Barbara	12.4	72.5	15.1	29.5	62	1.3	0.4	4.1	2.7
6083001402	6.80	6.24	5-10%	3392 Santa Barbara	8.8	61.4	29.8	7.3	88.2	0.5	0.5	1.8	1.7
6013345108	6.80	6.23	5-10%	7353 Contra Costa	12.2	77.7	10.1	7.9	61.1	2.1	0.2	24.7	4.1
6073002002	6.79	6.22	5-10%	2559 San Diego	11.4	77.3	11.3	16.7	70.3	5.7	0.2	4.5	2.7
6073017303	6.78	6.21	5-10%	3018 San Diego	11.3	75.5	13.2	9.4	84.7	0.3	0.2	3	2.4
6013355302	6.77	6.19	5-10%	3484 Contra Costa	10.8	71.9	17.3	6.3	69.2	1.1	0.1	18.7	4.5
6041130201	6.77	6.18	5-10%	3191 Marin	6	70.7	23.3	4.2	87.7	0.8	0.3	4.9	2.1
6061021039	6.76	6.17	5-10%	1771 Placer	0	13.5	86.5	2.5	93.8	0.3	0.5	2	0.8
6059062619	6.75	6.15	5-10%	3885 Orange	9	72.5	18.5	5.4	87.9	0.7	0.2	2.9	3
6061022300	6.74	6.14	5-10%	709 Placer	7.6	77.9	14.5	3.1	93.9	0.7	0.4	1.4	0.4
6073009805	6.74	6.13	5-10%	4715 San Diego	9.8	72.5	17.7	12.7	76.4	2.7	0.3	4.6	3.3
6059042338	6.73	6.12	5-10%	4580 Orange	10.5	76	13.5	9.8	83.1	0.7	0.1	3.8	2.4
6037800406	6.71	6.10	5-10%	2644 Los Angeles	7.8	77.8	14.4	11.9	78.4	3.5	0.2	3.2	2.8
6023010501	6.70	6.09	5-10%	6635 Humboldt	13.3	74.3	12.4	7.8	80.6	0.7	4.4	1.6	4.9
6097154304	6.70	6.08	5-10%	2400 Sonoma	7.3	73.9	18.8	12.3	79.4	0.3	3.8	1.6	2.7
6073015502	6.70	6.07	5-10%	2748 San Diego	11.2	77.9	10.9	16.1	74.3	0.7	3.9	2	2.9
6059052513	6.69	6.05	5-10%	5675 Orange	10.4	75.3	14.3	11.4	56.8	1.2	0.2	26.5	3.9
6073008328	6.69	6.04	5-10%	5162 San Diego	16.3	76.4	7.3	7.7	64.3	0.9	0.1	23	4
6079011001	6.69	6.03	5-10%	5314 San Luis Obispo	9.1	71.8	19.1	16.2	75	0.9	0.2	5.1	2.6
6017030803	6.68	6.02	5-10%	7241 El Dorado	12	71.5	16.5	9	84.9	0.3	0.6	2.5	2.5
6073007302	6.68	6.00	5-10%	2060 San Diego	9.7	73.6	16.7	6.8	88.9	0.3	0	2.3	1.6
6073015406	6.68	5.99	5-10%	2492 San Diego	8.2	74.5	17.3	10.6	81.7	1.2	0.6	2.6	3.2
6057000401	6.66	5.98	5-10%	5744 Nevada	8.2	57.1	34.7	5.4	90.7	0.3	0.7	1.2	1.8
6059042325	6.66	5.97	5-10%	3375 Orange	9.2	77.8	13	8.8	76.4	1.2	0.2	8.7	4.6
6085503334	6.66	5.95	5-10%	8854 Santa Clara	18	74.7	7.3	7.3	27.3	2	0	59.5	3.9
6085509802	6.66	5.94	5-10%	2719 Santa Clara	16.1	70.2	13.7	10.2	60.5	1.2	0.1	23.5	4.5
6061022100	6.65	5.93	5-10%	961 Placer	8.6	80.6	10.8	2.3	94.4	1	0	1.2	1
6073007701	6.64	5.91	5-10%	3703 San Diego	3.9	84.8	11.3	10.1	82.3	0.9	0.5	3.3	2.9
6075017102	6.64	5.90	5-10%	3451 San Francisco	9.4	83.4	7.2	7	75.7	3.6	0.2	9	4.4
6087100900	6.62	5.89	5-10%	4236 Santa Cruz	8.3	76.3	15.4	13.9	79	1.2	0.1	3	2.7
6059062633	6.62	5.88	5-10%	6545 Orange	19.4	76.9	3.7	10.3	65.4	0.9	0.1	18.3	5
6083002013	6.62	5.86	5-10%	2737 Santa Barbara	8	68.5	23.5	21.1	71	0.9	0.3	4.1	2.6
6085509801	6.62	5.85	5-10%	5274 Santa Clara	14	73.7	12.3	13.1	57	1.3	0.2	23	5.4
6065044917	6.61	5.84	5-10%	3911 Riverside	2.3	40.5	57.2	4.5	91.3	0.8	0.3	2.1	0.9
6073007100	6.59	5.83	5-10%	5029 San Diego	7.1	66.9	26	5.9	88.6	1	0.2	2.2	2
6061021901	6.59	5.81	5-10%	3060 Placer	8.2	74.9	16.9	6.1	88.2	0.8	0.8	1.9	2.4
6081608001	6.58	5.80	5-10%	3393 San Mateo	13.2	74.9	11.9	7	41.9	1.4	0	46.2	3.5
6013348000	6.58	5.79	5-10%	4587 Contra Costa	12.3	68.4	19.3	4.4	82.9	0.4	0.1	8.4	3.7
6075021600	6.57	5.78	5-10%	3836 San Francisco	8.6	76.3	15.1	9.7	60.4	5.6	0.2	19.6	4.5
6037300100	6.56	5.76	5-10%	6002 Los Angeles	10.1	75.6	14.3	8.6	65.1	0.6	0.1	22.7	2.9
6037670702	6.55	5.75	5-10%	5477 Los Angeles	9.7	65	25.3	9.2	72.5	1.9	0.2	12.4	3.9
6085506802	6.55	5.74	5-10%	5237 Santa Clara	13.7	73.5	12.8	13.3	71.2	1.1	0.3	10.8	3.3
6079010707	6.54	5.73	5-10%	5751 San Luis Obispo	7.6	65.7	26.7	9.7	84.2	0.4	0.2	2.9	2.6
6083000700	6.51	5.71	5-10%	6408 Santa Barbara	7.8	74.8	17.4	22.8	70.3	0.9	0.5	3.3	2.3
6059021912	6.51	5.70	5-10%	4828 Orange	13.9	73.7	12.4	11.4	66.6	0.5	0.2	18.4	2.9
6061021044	6.50	5.69	5-10%	5719 Placer	17	77.2	5.8	12.6	71.8	2.3	0.5	8.8	4
6083002928	6.50	5.68	5-10%	4089 Santa Barbara	2.3	96.1	1.6	21.9	61.7	1.8	0.1	10.1	4.5
6073007502	6.50	5.66	5-10%	3227 San Diego	4.9	90.1	5	10.8	81.2	1.6	0.5	2.6	3.3
6073017051	6.49	5.65	5-10%	4301 San Diego	8.5	66.2	25.3	9.1	67.2	3.2	0.1	17.6	2.7
6111001800	6.49	5.64	5-10%	4302 Ventura	9.3	69.7	21	13.6	79.1	0.6	0.3	3.4	3
6059062630	6.49	5.62	5-10%	1722 Orange	8.7	69.1	22.2	3.9	66.5	0.1	0	26.3	3.2
6059032037	6.49	5.61	5-10%	4929 Orange	5.7	44.7	49.6	6.4	82.9	1	0.2	7.1	2.4
6061021128	6.48	5.60	5-10%	2686 Placer	12.5	78.4	9.1	13.1	74.6	1.3	0.6	6.6	3.9
6085507301	6.47	5.59	5-10%	6555 Santa Clara	8.9	64.9	26.2	3.6	60.9	0.2	0.1	32	3.1
6087101100	6.47	5.57	5-10%	5444 Santa Cruz	8.8	80.1	11.1	12.1	77.5	2	0.4	3.8	4.2
6089011900	6.47	5.56	5-10%	4511 Shasta	9	70.2	20.8	5.6	89.5	0.4	1.7	0.5	2.3
6001442000	6.47	5.55	5-10%	3212 Alameda	8.3	80.1	11.6	3.6	22	0.6	0	69.6	4.3
6037920016	6.46	5.54	5-10%	4904 Los Angeles	15.3	78.8	5.9	18.9	63	4.4	0.2	9.8	3.8
6057001203	6.41	5.52	5-10%	2927 Nevada	10.9	76.6	12.5	7.6	89	0.1	0.2	1.9	1.2
6001430200	6.41	5.51	5-10%	6916 Alameda	9.2	75.7	15.1	12.5	63.9	2.7	0.2	16.4	4.3
6097152600	6.40	5.50	5-10%	8365 Sonoma	9.9	72.9	17.2	7.2	84.2	0.6	0.2	5.1	2.7
6037139703	6.39	5.49	5-10%	2943 Los Angeles	10.8	71.2	18	4.4	84.2	1.7	0	5.1	4.7
6085507402	6.39	5.47	5-10%	3881 Santa Clara	11.6	72.1	16.3	7.3	59.1	0.5	0	29	4
6089010702	6.38	5.46	5-10%	3896 Shasta	12.8	70.6	16.6	6.5	85	1	1	3.3	3.2
6073008333	6.38	5.45	5-10%	13748 San Diego	20.1	76.1	3.8	7.2	57.1	0.9	0.1	30.5	4.2
6037134421	6.38	5.44	5-10%	3941 Los Angeles	11.6	71.3	17.1	8.4	73.6	1.7	0.1	11.8	4.4
6085511200	6.37	5.42	5-10%	4849 Santa Clara	14.2	70.9	14.9	3.8	74	1.5	0.1	15.9	4.7
6087120600	6.37	5.41	5-10%	4733 Santa Cruz	9.4	81.1	9.5	8.7	85.8	0.8	0.5	1.3	2.8

6073008313	6.37	5.40	5-10%	2225 San Diego	11.3	64.8	23.9	8.7	78.3	0.4	0.2	8.6	3.9
6081613400	6.36	5.39	5-10%	3093 San Mateo	10.8	69.8	19.4	5.1	88.6	0.4	0	3.8	2.2
6087121100	6.36	5.37	5-10%	2963 Santa Cruz	9.7	74.9	15.4	12.6	79.9	0.5	0.3	2.7	3.9
6085511609	6.35	5.36	5-10%	3183 Santa Clara	11.9	62	26.1	4.9	62.9	1.9	0.1	27	3.3
6059042323	6.35	5.35	5-10%	4512 Orange	6.1	67.3	26.6	7.5	85.4	0.9	0.4	3.6	2.3
6001405100	6.34	5.33	5-10%	4197 Alameda	16.3	68.8	14.9	5.4	68	11.8	0.1	9.3	5.3
6073007002	6.34	5.32	5-10%	2947 San Diego	10.4	66.4	23.2	6.4	88.2	0.4	0.4	2.3	2.2
6059063006	6.34	5.31	5-10%	2756 Orange	4.5	62.5	33	4.4	92.6	0.4	0.3	1.3	1.1
6073017055	6.34	5.30	5-10%	5483 San Diego	15.6	79	5.4	7.7	56.4	2.1	0.3	29.4	4.1
6073008002	6.33	5.28	5-10%	2522 San Diego	10.2	72.9	16.9	6.7	87.8	0.5	0.2	2.6	2.2
6081613900	6.33	5.27	5-10%	6064 San Mateo	16.3	71.4	12.3	9.4	70.8	3.4	0.3	11.6	4.5
6061020104	6.32	5.26	5-10%	1288 Placer	7.8	75.8	16.4	6.8	89.8	0.4	0.5	1.5	1.1
6013337300	6.32	5.25	5-10%	6098 Contra Costa	11.3	71.3	17.4	9.3	68	1.6	0.1	16.6	4.3
6041104300	6.32	5.23	5-10%	1530 Marin	7.3	66.6	26.1	5.9	87.2	0.7	0.2	3.8	2.2
6059062637	6.30	5.22	5-10%	4525 Orange	11.6	82.9	5.5	16.4	63.7	2.5	0.4	13	4
6075020300	6.30	5.21	5-10%	3034 San Francisco	3.7	88.7	7.6	15.3	66.3	2.2	0.3	12.1	3.8
6059042329	6.29	5.20	5-10%	3772 Orange	9.4	73.6	17	10	80.7	0.8	0.1	5.8	2.6
6061020106	6.28	5.18	5-10%	1719 Placer	11.2	78.5	10.3	21.8	74.2	0.2	0.3	1.6	1.9
6001421700	6.28	5.17	5-10%	3198 Alameda	7.2	77.7	15.1	7.3	67.9	2.8	0.3	16.2	5.5
6075035100	6.28	5.16	5-10%	7842 San Francisco	9.2	76.3	14.5	5.5	31.1	1.1	0.1	59.5	2.8
6083003007	6.26	5.15	5-10%	3653 Santa Barbara	7.2	62.2	30.6	8.5	86.7	0.6	0.1	2.2	2
6075021700	6.25	5.13	5-10%	3948 San Francisco	10.4	70.7	18.9	12.9	54.8	9.5	0.4	18.2	4.3
6073008335	6.25	5.12	5-10%	10541 San Diego	17.6	77	5.4	8.6	49.3	2	0.1	34.9	5.1
6073019804	6.24	5.11	5-10%	4447 San Diego	11.2	74.9	13.9	12.9	78.5	0.9	0.1	4.6	3
6073009507	6.23	5.10	5-10%	3369 San Diego	10.9	77.4	11.7	13.1	66.1	4	0.3	11.1	5.4
6059032020	6.22	5.08	5-10%	5715 Orange	11.1	79.2	9.7	16.9	71	1	0.2	7.2	3.7
6073017022	6.19	5.07	5-10%	5316 San Diego	12.8	74.3	12.9	10.5	73.5	3.1	0.1	8.7	4.1
6013349000	6.19	5.06	5-10%	4686 Contra Costa	13.2	71.4	15.4	7.9	77.2	0.9	0.2	10	3.8
6073017041	6.18	5.04	5-10%	6147 San Diego	13.2	77.6	9.2	20	64.6	1.6	0.2	10.4	3.2
6013345115	6.18	5.03	5-10%	5734 Contra Costa	14.6	78.2	7.2	8.3	58.2	2.1	0.1	27	4.2
6085506801	6.18	5.02	5-10%	5871 Santa Clara	13.3	74	12.7	9	72.9	0.4	0.2	13.1	4.4
6073011000	6.18	5.01	5-10%	2799 San Diego	9	70	21	11	78.6	1.9	0.3	5.3	3
6013340002	6.16	4.99	1-5% (lowest scores)	7000 Contra Costa	11.3	72.9	15.8	7.4	77.4	0.9	0.3	10.2	3.8
6053011900	6.16	4.98	1-5% (lowest scores)	4449 Monterey	5.6	59.9	34.5	3.7	84.4	0.9	0.2	8.5	2.2
6013345116	6.15	4.97	1-5% (lowest scores)	2859 Contra Costa	14.7	77.2	8.1	11.1	65	1.1	0.2	17.7	4.9
6073007301	6.14	4.96	1-5% (lowest scores)	4948 San Diego	4.9	88.4	6.7	9	83.9	0.9	0.3	2.6	3.3
6111005306	6.14	4.94	1-5% (lowest scores)	4867 Ventura	11.5	76.7	11.8	16.4	70.1	1	0.1	9.4	2.9
6085507203	6.14	4.93	1-5% (lowest scores)	2632 Santa Clara	11.6	74.7	13.7	8.1	70.9	0.8	0.3	15.7	4.3
6013385200	6.14	4.92	1-5% (lowest scores)	1320 Contra Costa	10.3	65.6	24.1	5.7	46.1	6	0.2	36.1	5.8
6097152300	6.14	4.91	1-5% (lowest scores)	4329 Sonoma	9.4	64.4	26.2	6.3	87.8	0.5	0.3	2.3	2.7
6059032057	6.14	4.89	1-5% (lowest scores)	7218 Orange	23.3	72.1	4.6	12.5	70.8	1.4	0.1	11.2	4
6073008330	6.09	4.88	1-5% (lowest scores)	5668 San Diego	12.9	80.5	6.6	6.5	62	0.5	0.1	27.8	3.2
6059062643	6.09	4.87	1-5% (lowest scores)	7246 Orange	12.9	73.2	13.9	4.7	71.7	0.5	0.1	18.7	4.3
6097151602	6.09	4.86	1-5% (lowest scores)	3324 Sonoma	3	36.7	60.3	3.1	93.6	0.2	0.2	2	1
6081609300	6.08	4.84	1-5% (lowest scores)	3315 San Mateo	18.2	68.4	13.4	8.9	79	0.7	0	7.8	3.6
6059099415	6.08	4.83	1-5% (lowest scores)	5374 Orange	10	73.7	16.3	8.3	76.5	0.3	0.3	12	2.7
6001443200	6.08	4.82	1-5% (lowest scores)	3704 Alameda	9.7	78.9	11.4	3.1	23	0.8	0	68.6	4.6
6041126200	6.07	4.81	1-5% (lowest scores)	4249 Marin	10.5	64.6	24.9	5.7	79.1	1.4	0.2	10.1	3.5
6073009704	6.07	4.79	1-5% (lowest scores)	5750 San Diego	10.2	71	18.8	13.4	71.9	4.1	0.3	6.7	3.6
6059042330	6.07	4.78	1-5% (lowest scores)	6378 Orange	16.3	77.7	6	28	60	1.4	0.1	7.3	3.2
6013355304	6.04	4.77	1-5% (lowest scores)	7831 Contra Costa	11.5	75.2	13.3	9.6	76.5	1.6	0.3	7.9	4
6037262303	6.03	4.75	1-5% (lowest scores)	3290 Los Angeles	11.7	64.5	23.8	3.3	86.6	0.9	0	5.4	3.7
6111007405	6.03	4.74	1-5% (lowest scores)	6304 Ventura	10.3	80.6	9.1	7.2	79.6	1.1	0.1	9.2	2.8
6075030302	6.03	4.73	1-5% (lowest scores)	3549 San Francisco	9.4	74.5	16.1	6.4	43.4	0.6	0.2	45.2	4.2
6073008200	6.02	4.72	1-5% (lowest scores)	3022 San Diego	4.8	55	40.2	6.9	86.1	0.6	0	4.3	2.1
6075020402	6.01	4.70	1-5% (lowest scores)	3997 San Francisco	4.9	84.8	10.3	11.2	66.3	2.8	0.2	15.3	4.2
6013321102	6.01	4.69	1-5% (lowest scores)	6689 Contra Costa	9.5	76.5	14	10.5	71.5	1.3	0.1	12.3	4.3
6037621001	6.00	4.68	1-5% (lowest scores)	4119 Los Angeles	10.4	76.7	12.9	8	78.7	1.1	0	7.5	4.7
6061021131	5.99	4.67	1-5% (lowest scores)	5142 Placer	12.2	73.6	14.2	12	77.9	1.4	0.3	5.6	2.8
6073017106	5.98	4.65	1-5% (lowest scores)	4973 San Diego	8.1	69.2	22.7	6.5	87.9	0.3	0	3.3	2
6073019809	5.97	4.64	1-5% (lowest scores)	4005 San Diego	8.5	67.8	23.7	13.8	76.7	1.6	0.3	5.1	2.5
6097151504	5.97	4.63	1-5% (lowest scores)	3563 Sonoma	11.1	69.6	19.3	10.8	80.8	1.8	0.7	2.6	3.2
6053012502	5.97	4.62	1-5% (lowest scores)	5082 Monterey	7.8	79.1	13.1	11.8	73.7	2	0.3	7.5	4.7
6059062632	5.96	4.60	1-5% (lowest scores)	3979 Orange	8	70.1	21.9	6.4	85.1	1.1	0.1	4.5	2.8
6001420100	5.96	4.59	1-5% (lowest scores)	2355 Alameda	13.4	74.5	12.1	8.7	61.3	2.3	0	21.6	6.2
6001408000	5.94	4.58	1-5% (lowest scores)	2671 Alameda	9.7	73.3	17	9.6	51.8	12.8	0.3	19.8	5.7
6085508203	5.94	4.57	1-5% (lowest scores)	5172 Santa Clara	19.7	66.6	13.7	4.8	42.1	1.1	0.1	47.9	4
6041110200	5.94	4.55	1-5% (lowest scores)	5327 Marin	10.6	63.9	25.5	4.1	88	0.2	0.1	4.4	3.1
6055201101	5.93	4.54	1-5% (lowest scores)	1996 Napa	11.7	68.3	20	8.4	85.1	0.4	0.2	3.4	2.5
6083001306	5.93	4.53	1-5% (lowest scores)	3230 Santa Barbara	6.9	65.5	27.6	13.3	79.6	1	0.2	3.9	2
6075030400	5.93	4.52	1-5% (lowest scores)	5106 San Francisco	9.7	72.9	17.4	5.4	49	1	0	40.1	4.5
6037620201	5.92	4.50	1-5% (lowest scores)	1530 Los Angeles	5.3	87.6	7.1	8	80.9	0.7	0.1	5.9	4.3
6073017108	5.91	4.49	1-5% (lowest scores)	4658 San Diego	13.9	75.8	10.3	12.2	79	0.4	0.2	4.7	3.6
6041108100	5.90	4.48	1-5% (lowest scores)	6406 Marin	10.9	67	22.1	6.8	82.1	1	0.4	6	3.8
6085502603	5.89	4.46	1-5% (lowest scores)	2527 Santa Clara	13	69.9	17.1	14.8	70.1	1.3	0.1	9.2	4.6
6037670202	5.88	4.45	1-5% (lowest scores)	2594 Los Angeles	11.4	66.5	22.1	8.2	70.3	1.1	0.3	16.8	3.3
6059099220	5.87	4.44	1-5% (lowest scores)	5115 Orange	8.1	81.5	10.4	11.4	76.9	0.8	0.5	7.1	3.3
6073009804	5.87	4.43	1-5% (lowest scores)	4773 San Diego	10.6	68.6	20.8	14.1	74	2.6	0.4	5.6	3.3
6059099506	5.87	4.41	1-5% (lowest scores)	1253 Orange	6.9	78.1	15	8.9	83.6	0.3	0.5	4	2.8
6001420600	5.85	4.40	1-5% (lowest scores)	3283 Alameda	13.6	73.3	13.1	7.6	69.5	2.7	0.1	14.6	5.4
6081605600	5.85	4.39	1-5% (lowest scores)	5556 San Mateo	12.3	66.1	21.6	3.9	65	0.2	0	27.2	3.6
6073017046	5.85	4.38	1-5% (lowest scores)	3678 San Diego	12.2	76.3	11.5	8.2	67.3	1.1	0	20.4	3
6037621004	5.84	4.36	1-5% (lowest scores)	4762 Los Angeles	11	79	10	7.5	84.6	0.6	0.2	3.9	3.3
6037901210	5.83	4.35	1-5% (lowest scores)	1591 Los Angeles	10.4	81.4	8.2	13.4	80.7	1.4	0.2	1.3	3
6059032044	5.83	4.34	1-5% (lowest scores)	5760 Orange	7.7	81.1	11.2	6.8	85.1	0.7	0.2	4.7	2.5
6073006900	5.83	4.33	1-5% (lowest scores)	5148 San Diego	10.4	74.8	14.8	10.2	82.1	1.1	0.5	3	3.1
6081603300	5.82	4.31	1-5% (lowest scores)	6404 San Mateo	10.7	75.5	13.8	15.5	70.5	1	0.3	7.5	5.2
6087122202	5.82	4.30	1-5% (lowest scores)	2221 Santa Cruz	10	74.4	15.6	11.1	81	0.8	0.1	4.4	2.5
6059062629	5.82	4.29	1-5% (lowest scores)	2660 Orange	10.7	71.6	17.7	3.8	61.1	0.5	0	30.5	4.1
6065045608	5.81	4.28	1-5% (lowest scores)	2878 Riverside	2.4	53.4	44.2	5	89.9	0.6	0.1	3.3	1.1
6085508301	5.81	4.26	1-5% (lowest scores)	4410 Santa Clara	12	68.6	19.4	4.5	54.2	0.7	0.1	37.5	3.1
6085506900	5.79	4.25	1-5% (lowest scores)	7436 Santa Clara	12.9	68.7	18.4	6.9	76.7	0.5	0.1	11.4	4.4
6037800330	5.78	4.24	1-5% (lowest scores)	942 Los Angeles	9.6	77.9	12.5	6.6	89.4	1	0.3	1	1.8
6083000400	5.76	4.22	1-5% (lowest scores)	4659 Santa Barbara	8	75.2	16.8	16.6	76.9	0.8	0.2	3.3	2.1
6081604700	5.76	4.21	1-5% (lowest scores)	2781 San Mateo	8.7	72	19.3	9.1	44	0.4	0	43.3	3.2
6017030807	5.75	4.20	1-5% (lowest scores)	3986 El Dorado	12.8	75.2	12	9	83.8	0.8	0.5	2.9	3
6085511500	5.75	4.19	1-5% (lowest scores)	7513 Santa Clara	10.2	74	15.8	6.4	68.8	2	0.2	17.7	4.9
6085502202	5.73	4.17	1-5% (lowest scores)	2870 Santa Clara	9.8	74.8	15.4	13.7	65.2	2.3	0.2	14.1	4.5
6073007702	5.73	4.16	1-5% (lowest scores)	3849 San Diego	3.7	89.3	7	10.3	81	1.1	0.3	3.9	3.4
6073021800	5.73	4.15	1-5% (lowest scores)	2022 San Diego	8.5	68.4	23.1	7.5	87.2	0.4	0.4	2.8	1.8
6081609603	5.72	4.14	1-5% (lowest scores)	5318 San Mateo	11.2	70.6	18.2	7.3	78.1	1	0.1	10.3	3.3
6087120301	5.72	4.12	1-5% (lowest scores)	5180 Santa Cruz	9.5	79.5	11	7.5	86.3	0.6	0.5	1.6	3.3
6079011901	5.71	4.11	1-5% (lowest scores)	2987 San Luis Obispo	8.9	63.3	27.8	13.8	78.8	0.9	0.4	3.2	2.9
6073010800	5.70	4.10	1-5% (lowest scores)	2390 San Diego	9.9	73.6	16.5	8.6	85.1	0.7	0.7	1.8	3.1
6067008403	5.70	4.09	1-5% (lowest scores)	5246 Sacramento	14.4	73.8	11.8	10	69.6	1.4	0.4	13.1	5.5
6075030800	5.69	4.07	1-5% (lowest scores)	5667 San Francisco	10	69.6	20.4	6.5	56.6	1.5	0.1	30.9	4.5
6073009506	5.68	4.06	1-5% (lowest scores)	4258 San Diego	12.7	75.4	11.9	12.5	67	4.4	0.3	10.1	5.7
6111007403	5.68	4.05	1-5% (lowest scores)	5585 Ventura	10.9	80	9.1	5.2	78	1.2	0.1	12.8	2.7
6065045124	5.67	4.04	1-5% (lowest scores)	1505 Riverside	5.7	58.2	36.1	15.7	80.3	0.6	0.7	1.7	1
6001404200	5.66	4.02	1-5% (lowest scores)	3483 Alameda	12.9	71.3	15.8	5.4	72.9	4.9	0.3	11.7	4.9
6079012600	5.64	4.01	1-5% (lowest scores)	7793 San Luis Obispo	11.7	73.6	14.7	14	80	1	0.7	2	2.3
6067008507	5.63	4.00	1-5% (lowest scores)	3687 Sacramento	16	76.5	7.5	9.8	66.8	2	0.4	17.3	3.6
6079012505	5.62	3.99	1-5% (lowest scores)	4891 San Luis Obispo	12.5	76.4	11.1	14.6	79.3	0.7	0.7	2.1	2.7
6037670403	5.62	3.97	1-5% (lowest scores)	2407 Los Angeles	9.6	62.8	27.6	5.5	54.1	1.3	0.2	34.6	4.2
6001404400	5.62	3.96	1-5% (lowest scores)	5314 Alameda	13	75.1	11.9	6.7	67.6	4.8	0.1	15.5	5.4
6073019103	5.60	3.95	1-5% (lowest scores)	6373 San Diego	10.6	75.3	14.1	24.4	69.4	0.4	0.6	3	2.1
6041119202	5.59	3.93	1-5% (lowest scores)	3361 Marin	14.6	64.9	20.5	3.5	86.8	0.6	0	5.5	3.6
6059075606	5.58	3.92	1-5% (lowest scores)	6941 Orange	12.2	71.2	16.6	9.2	69.3	0.5	0.3	17.5	3.2
6041109002	5.58	3.91	1-5% (lowest scores)	3956 Marin	12.4	68.1	19.5	6.6	85.4	1	0.2	4.2	2.5
6083002909	5.57	3.90	1-5% (lowest scores)	5963 Santa Barbara	12	77.1	10.9	37.3	50.3	1	0.5	7.7	3.2
6059075810	5.56	3.88	1-5% (lowest scores)	3046 Orange	9.7	67.1	23.2	11.4	68.7	1	0.5	16.3	2.1
6073017104	5.55	3.87	1-5% (lowest scores)	3907 San Diego	11.4	77.1	11.5	11.4	80.7	0.5	0.2	4.4	2.9
6061023100	5.55	3.86	1-5% (lowest scores)	6491 Placer	20.4	72.8	6.8	11.1	65.6	2.6	0.4	15.9	4.4

6085507500	5.53	3.85	1-5% (lowest scores)	5810 Santa Clara	9.3	72.1	18.6	1.9	41.5	0.2	0	53.6	2.9
6013338302	5.52	3.83	1-5% (lowest scores)	5807 Contra Costa	10.4	69.9	19.7	6.4	75.1	0.8	0.2	13.2	4.3
6001426200	5.52	3.82	1-5% (lowest scores)	4745 Alameda	14	74.6	11.4	4.8	70	1.3	0	18.3	5.6
6055200703	5.50	3.81	1-5% (lowest scores)	3047 Napa	9.9	69.9	20.2	10.1	84.6	0.4	0.4	2.7	1.8
6073008003	5.50	3.80	1-5% (lowest scores)	3334 San Diego	4.8	84.6	10.6	10	82.4	0.7	0.2	3.1	3.7
6061020604	5.48	3.78	1-5% (lowest scores)	5589 Placer	10.9	75.1	14	7.4	83.3	0.7	0.4	4.7	3.6
6059032032	5.48	3.77	1-5% (lowest scores)	3075 Orange	10.9	77.5	11.6	16.4	70.9	0.6	0.1	7.7	4.3
6097153807	5.45	3.76	1-5% (lowest scores)	3861 Sonoma	12.5	75.4	12.1	16	77.3	0.4	0.6	2.8	2.9
6075012601	5.44	3.75	1-5% (lowest scores)	2329 San Francisco	7	81.7	11.3	5.4	80.7	0.6	0.2	9.9	3.1
6079011800	5.42	3.73	1-5% (lowest scores)	7138 San Luis Obispo	8.6	69.9	21.5	9.1	84.6	0.3	0.2	3.2	2.7
6037670407	5.41	3.72	1-5% (lowest scores)	5758 Los Angeles	9.6	74.8	15.6	6.2	39.2	2.8	0	47.8	3.9
6041120000	5.41	3.71	1-5% (lowest scores)	6027 Marin	10.7	70.6	18.7	5.6	86.7	0.6	0.1	3.8	3.2
6013390200	5.41	3.70	1-5% (lowest scores)	1719 Contra Costa	11.4	70.6	18	7.8	66.6	1.9	0.2	17.5	6
6081613300	5.40	3.68	1-5% (lowest scores)	2723 San Mateo	10.9	69.4	19.7	4.6	84	0.5	0.1	8	2.8
6075030500	5.40	3.67	1-5% (lowest scores)	3046 San Francisco	7.8	62.5	29.7	10.3	51.7	10.7	0.3	23.4	3.7
6081613000	5.40	3.66	1-5% (lowest scores)	3386 San Mateo	11.2	64.4	24.4	5.1	73.1	0.6	0.1	16.8	4.3
6037670324	5.37	3.64	1-5% (lowest scores)	5127 Los Angeles	10.8	64.9	24.3	3.8	80.2	0.8	0.1	11.7	3.4
6085502907	5.37	3.63	1-5% (lowest scores)	3912 Santa Clara	13.4	71.1	15.5	15.9	64.5	1.1	0.2	13.1	5.1
6085509600	5.36	3.62	1-5% (lowest scores)	2625 Santa Clara	10.1	82.2	7.7	12.6	57.3	1.4	0.1	24.5	4
6055201402	5.36	3.61	1-5% (lowest scores)	2871 Napa	8.6	69.4	22	6.8	88.4	0.5	0.3	2.1	2
6059062701	5.35	3.59	1-5% (lowest scores)	2800 Orange	7.4	69.2	23.4	5	89.4	0.5	0.2	3.1	1.8
6075012800	5.35	3.58	1-5% (lowest scores)	4106 San Francisco	7.5	77.7	14.8	4.8	82.4	0.9	0.1	9.1	2.8
6037262604	5.34	3.57	1-5% (lowest scores)	6092 Los Angeles	11.2	64.7	24.1	4.8	84.6	0.5	0.1	6.6	3.3
6037651201	5.34	3.56	1-5% (lowest scores)	5056 Los Angeles	10.9	75.3	13.8	11.4	67.5	0.7	0.4	15.9	4
6059042305	5.34	3.54	1-5% (lowest scores)	3432 Orange	7.5	70.7	21.8	5.5	89.2	0.3	0.1	2.8	2.1
6075012602	5.33	3.53	1-5% (lowest scores)	2909 San Francisco	8.3	78	13.7	4.6	82.4	0.6	0	10.1	2.3
6097152202	5.33	3.52	1-5% (lowest scores)	6763 Sonoma	12.6	68.8	18.6	17.9	70.1	2.1	0.9	5.2	3.8
6073017050	5.32	3.51	1-5% (lowest scores)	3068 San Diego	11.5	72.5	16	21.7	59.6	1.2	0.4	13.9	3.2
6081603400	5.32	3.49	1-5% (lowest scores)	5483 San Mateo	10.1	72.4	17.5	16.3	65.5	1.3	0.4	11.3	5.2
6037262301	5.29	3.48	1-5% (lowest scores)	2744 Los Angeles	9.2	63.6	27.2	11.7	71.6	1.2	0.1	12.1	3.4
6081611100	5.29	3.47	1-5% (lowest scores)	5913 San Mateo	13	69.4	17.6	12.5	74.2	1	0.1	8.1	4.1
6111007506	5.28	3.46	1-5% (lowest scores)	7514 Ventura	12.1	78.3	9.6	15.3	74.1	0.9	0.2	6.4	3.1
6083002009	5.28	3.44	1-5% (lowest scores)	3826 Santa Barbara	10.5	73.6	15.9	25.7	65.4	1.5	0.8	3.5	3.2
6065045114	5.26	3.43	1-5% (lowest scores)	1939 Riverside	3.1	48	48.9	5.6	90.6	0.6	0.5	1.7	1.1
6061021035	5.26	3.42	1-5% (lowest scores)	7431 Placer	17.5	77.4	5.1	12.7	68.1	1.8	0.4	12.9	4.2
6075021100	5.26	3.41	1-5% (lowest scores)	3853 San Francisco	9.3	80.9	9.8	9.1	74.9	1.2	0.2	9.9	4.7
6085506604	5.24	3.39	1-5% (lowest scores)	7324 Santa Clara	14.9	73.7	11.4	11.9	54.1	2.7	0.2	26.4	4.7
6059075809	5.24	3.38	1-5% (lowest scores)	3023 Orange	6.5	68.5	25	10.1	74.6	0.5	0.4	12.4	2
6001450604	5.24	3.37	1-5% (lowest scores)	4796 Alameda	12.4	75.3	12.3	10.6	72.9	0.9	0.3	11.9	3.4
6075017101	5.23	3.35	1-5% (lowest scores)	3544 San Francisco	10	80.2	9.8	7.6	78.3	3.7	0.1	6.5	3.8
6059032031	5.22	3.34	1-5% (lowest scores)	3654 Orange	11.9	78.3	9.8	16.8	69.6	1	0.3	8.3	4
6067008209	5.21	3.33	1-5% (lowest scores)	4085 Sacramento	9.3	74.2	16.5	9.4	81.3	1	0.4	5.3	2.5
6085511800	5.21	3.32	1-5% (lowest scores)	4009 Santa Clara	11.2	76.8	12	8.4	83.2	0.3	0.2	4	3.8
6111005802	5.16	3.30	1-5% (lowest scores)	9090 Ventura	16.2	72.6	11.2	8.4	72.4	1.3	0.2	14	3.7
6081611600	5.16	3.29	1-5% (lowest scores)	2262 San Mateo	19.9	70.2	9.9	10.8	69.8	3.1	0.1	11.1	5.2
6037621102	5.15	3.28	1-5% (lowest scores)	2883 Los Angeles	13.7	78.2	8.1	9.8	78	0.8	0.2	6.9	4.3
6059032048	5.15	3.27	1-5% (lowest scores)	5590 Orange	11.3	64.8	23.9	13.5	71.5	1.4	0.1	10.3	3.2
6075030700	5.13	3.25	1-5% (lowest scores)	6343 San Francisco	11.8	70.7	17.5	9.6	57.2	2.9	0.1	25	5.2
6075021500	5.13	3.24	1-5% (lowest scores)	5096 San Francisco	10.5	80.5	9	19.2	65.6	1.3	0.2	10.2	3.5
6041103100	5.12	3.23	1-5% (lowest scores)	7168 Marin	10.5	71.5	18	8.3	83.4	1	0.2	4.4	2.7
6013343003	5.09	3.22	1-5% (lowest scores)	3843 Contra Costa	10.3	74	15.7	5.8	82.9	1	0.1	7.1	3.1
6085511907	5.08	3.20	1-5% (lowest scores)	3988 Santa Clara	13.4	70.8	15.8	8.3	52.9	0.6	0.1	34.4	3.7
6061022014	5.07	3.19	1-5% (lowest scores)	1736 Placer	7	79.2	13.8	2.9	89.2	0.3	0.2	4.7	2.6
6053011000	5.06	3.18	1-5% (lowest scores)	5933 Monterey	7.7	70.7	21.6	8.5	86.7	0.4	0.2	1.7	2.5
6067008510	5.05	3.17	1-5% (lowest scores)	4744 Sacramento	14.2	79.6	6.2	9.5	73.4	1.9	0.3	11.4	3.3
6017030808	5.04	3.15	1-5% (lowest scores)	6897 El Dorado	14.8	74.3	10.9	10.8	82.3	0.7	0.6	2.8	2.8
6075030102	5.03	3.14	1-5% (lowest scores)	4838 San Francisco	9.4	78.6	12	6.3	63	2	0.1	24.3	4.3
6079010701	5.03	3.13	1-5% (lowest scores)	4650 San Luis Obispo	10.7	75.7	13.6	14.3	76.9	0.5	0.5	5.2	2.6
6073017053	5.01	3.12	1-5% (lowest scores)	3364 San Diego	7.7	80	12.3	5.1	84.5	1.1	0.2	6.2	2.9
6061020601	4.98	3.10	1-5% (lowest scores)	6911 Placer	9.4	72.5	18.1	5.9	86.9	0.7	0.5	3.2	2.7
6041124200	4.95	3.09	1-5% (lowest scores)	5626 Marin	11.5	63.7	24.8	4.4	85.4	1	0.2	5.6	3.4
6073008327	4.93	3.08	1-5% (lowest scores)	5775 San Diego	12.6	76.7	10.7	6.8	69.5	0.5	0.1	19.8	3.4
6087121000	4.91	3.06	1-5% (lowest scores)	3423 Santa Cruz	9.1	76.8	14.1	6.1	88.2	0.2	0.5	2.1	2.8
6057000102	4.90	3.05	1-5% (lowest scores)	6677 Nevada	8.6	67.7	23.7	7	88.7	0.3	0.5	1.2	2.4
6059032038	4.89	3.04	1-5% (lowest scores)	6602 Orange	11.6	81.6	6.8	10.5	67.3	0.7	0.1	16.7	4.8
6065044922	4.88	3.03	1-5% (lowest scores)	3494 Riverside	9.1	67.3	23.6	13.8	74.3	2.5	0.3	7.3	1.8
6073007907	4.87	3.01	1-5% (lowest scores)	3048 San Diego	2.5	93.8	3.7	11.8	79.8	1.3	0.3	3	3.7
6037137504	4.85	3.00	1-5% (lowest scores)	1939 Los Angeles	9.3	68.6	22.1	4.3	83	3	0	4.8	4.8
6059062702	4.85	2.99	1-5% (lowest scores)	4713 Orange	8.2	72.9	18.9	6	88.4	0.3	0.2	3.3	1.7
6059062620	4.84	2.98	1-5% (lowest scores)	5065 Orange	8.3	74	17.7	6.9	86.2	0.6	0.1	3.7	2.6
6041132200	4.83	2.96	1-5% (lowest scores)	1774 Marin	7.4	69.2	23.4	14.8	80.9	0.6	0.3	1.6	1.8
6075013200	4.83	2.95	1-5% (lowest scores)	4162 San Francisco	8.8	74.2	17	3.8	81.3	1.1	0	10.7	3.1
6087122001	4.81	2.94	1-5% (lowest scores)	4909 Santa Cruz	9.3	77.6	13.1	13.5	79.8	0.6	0.2	2.9	3.1
6111007406	4.81	2.93	1-5% (lowest scores)	2377 Ventura	10.9	82.9	6.2	4.6	79.3	0.9	0.2	12.9	2.1
6037800506	4.80	2.91	1-5% (lowest scores)	3074 Los Angeles	9.2	69.6	21.2	5.1	84.4	1	0.1	5.8	3.7
6089011701	4.79	2.90	1-5% (lowest scores)	2240 Shasta	15.9	70	14.1	8.3	82.3	1.1	2.4	0.9	5
6085511912	4.79	2.89	1-5% (lowest scores)	5440 Santa Clara	12.5	75.7	11.8	5.7	48	0.5	0.2	42.2	3.5
6037920111	4.78	2.88	1-5% (lowest scores)	3246 Los Angeles	12.1	80.3	7.6	19.7	65.2	2.4	0.2	8.8	3.7
6073007910	4.78	2.86	1-5% (lowest scores)	2797 San Diego	2.4	91.9	5.7	9.7	81.7	1.4	0.1	3.8	3.3
6073010900	4.77	2.85	1-5% (lowest scores)	1750 San Diego	9.9	68.7	21.4	8.7	87	0.5	0.1	1.5	2.2
6073008337	4.76	2.84	1-5% (lowest scores)	4316 San Diego	12.5	77.7	9.8	9.3	57.1	2.3	0.3	25.7	5.3
6041128200	4.75	2.83	1-5% (lowest scores)	4582 Marin	13.6	71.5	14.9	4.6	85.9	0.8	0.1	5.4	3.2
6061023500	4.75	2.81	1-5% (lowest scores)	5159 Placer	22.7	73.1	4.2	11.6	70.5	2.1	0.5	10.9	4.4
6085511400	4.73	2.80	1-5% (lowest scores)	3639 Santa Clara	11.9	71.6	16.5	4.7	73.5	0.7	0	17.4	3.7
6041107000	4.73	2.79	1-5% (lowest scores)	6142 Marin	11.5	68.4	20.1	7.2	81.1	1.1	0.1	7	3.5
6013321103	4.72	2.77	1-5% (lowest scores)	4518 Contra Costa	10.7	73.4	15.9	10.3	76.7	1.3	0.3	7.2	4.1
6073011100	4.71	2.76	1-5% (lowest scores)	3698 San Diego	11.1	73	15.9	11.6	81.5	0.9	0.3	2.7	3.1
6055201102	4.70	2.75	1-5% (lowest scores)	2055 Napa	8.2	72.4	19.4	13	82.3	0.3	0.7	1.7	2.1
6037262302	4.70	2.74	1-5% (lowest scores)	2818 Los Angeles	11.5	67.2	21.3	3.4	86.7	1	0.1	6.1	2.7
6037670413	4.67	2.72	1-5% (lowest scores)	4782 Los Angeles	11.2	64.8	24	5.7	48.2	2.1	0.2	40.4	3.5
6059021920	4.67	2.71	1-5% (lowest scores)	6892 Orange	12.8	72.2	15	13	62.1	1.5	0.1	19.4	3.9
6073010601	4.67	2.70	1-5% (lowest scores)	2127 San Diego	9.3	61.9	28.8	20.8	72.1	1.2	0.4	3.1	2.5
6081612800	4.67	2.69	1-5% (lowest scores)	3296 San Mateo	18.3	66.3	15.4	3.7	84.9	0.2	0.2	6.9	4.1
6081609900	4.66	2.67	1-5% (lowest scores)	2944 San Mateo	13.3	69.5	17.2	13.4	78.1	0.3	0	5.4	2.6
6081609400	4.65	2.66	1-5% (lowest scores)	3278 San Mateo	17.1	70.3	12.6	7	80.7	0.6	0	7	4.6
6061021309	4.65	2.65	1-5% (lowest scores)	9552 Placer	17.8	78.3	3.9	10.6	72.7	2	0.3	10.3	4.1
6037670602	4.65	2.64	1-5% (lowest scores)	7345 Los Angeles	8.7	67.2	24.1	8.1	62.5	3	0.1	22.4	3.9
6001421500	4.62	2.62	1-5% (lowest scores)	3640 Alameda	9.9	67.2	22.9	5.2	79.9	1.6	0.1	8.7	4.5
6001404300	4.61	2.61	1-5% (lowest scores)	3218 Alameda	13.3	69.8	16.9	5.3	73.7	4.4	0.1	11.6	4.9
6019005520	4.61	2.60	1-5% (lowest scores)	2698 Fresno	18.3	74	7.7	17	63.7	2.1	0.3	13.2	3.8
6075021300	4.61	2.59	1-5% (lowest scores)	2474 San Francisco	11.2	79.3	9.5	7.9	76	0.8	0.2	10	5.1
6037670405	4.60	2.57	1-5% (lowest scores)	2646 Los Angeles	8.5	58.3	33.2	4.1	56.2	2	0.2	33.6	3.9
6081610303	4.58	2.56	1-5% (lowest scores)	7336 San Mateo	16.8	75.3	7.9	6.3	46.8	1.2	0.1	39.9	5.7
6041117000	4.57	2.55	1-5% (lowest scores)	4527 Marin	12.5	72.4	15.1	6.1	83.9	0.7	0.2	5.6	3.5
6059042111	4.56	2.53	1-5% (lowest scores)	5994 Orange	9	73.4	17.6	9.1	85.2	0.5	0.2	3.1	2
6085511913	4.53	2.52	1-5% (lowest scores)	4295 Santa Clara	13.7	70.7	15.6	9.8	69.9	0.6	0.2	15.3	4.2
6037620301	4.53	2.51	1-5% (lowest scores)	4657 Los Angeles	18	69.6	12.4	6.9	82.2	0.6	0.1	6.1	4.1
6041128100	4.52	2.50	1-5% (lowest scores)	6505 Marin	14.2	72.2	13.6	5.3	83.5	1	0.1	6	4.1
6085510002	4.52	2.48	1-5% (lowest scores)	3553 Santa Clara	14	68.4	17.6	4.7	64.5	0.3	0	25.7	4.8
6065045115	4.51	2.47	1-5% (lowest scores)	2026 Riverside	4.7	48.4	46.9	5.6	90	0.8	0.1	2.1	1.3
6059032046	4.51	2.46	1-5% (lowest scores)	6005 Orange	12.1	81	6.9	6.9	82.5	1.1	0.1	6.5	2.9
6013345103	4.49	2.45	1-5% (lowest scores)	5062 Contra Costa	11.3	72.1	16.6	9.7	66.3	1.4	0.3	18.7	3.6
6001404501	4.49	2.43	1-5% (lowest scores)	1677 Alameda	13	67.6	19.4	5.8	72.2	4.3	0.1	11.7	6
6085507100	4.46	2.42	1-5% (lowest scores)	2683 Santa Clara	10.5	79.5	10	8.5	78.6	0.6	0.4	8.5	3.5
6083002010	4.45	2.41	1-5% (lowest scores)	4375 Santa Barbara	10.9	74.7	14.4	20	71.9	1	0.6	4	2.6
6085507808	4.42	2.40	1-5% (lowest scores)	5508 Santa Clara	13.4	75.5	11.1	2.5	21.7	0.4	0.1	72.6	2.7
6073008301	4.38	2.38	1-5% (lowest scores)	3094 San Diego	8	54.6	37.4	7.6	83.9	0.9	0.2	4.9	2.4
6081609700	4.36	2.37	1-5% (lowest scores)	4386 San Mateo	12.5	73.1	14.4	7.6	80.5	0.6	0.1	7.6	3.5
6017031800	4.34	2.36	1-5% (lowest scores)	6798 El Dorado	20.9	73.3	5.8	10	65	2.5	0.3	17.7	4.5
6001404502	4.32	2.35	1-5% (lowest scores)	5784 Alameda	14.3	69.9	15.8	6	72.1	6.3	0.3	9.6	5.8
6013345114	4.30	2.33	1-5% (lowest scores)	6307 Contra Costa	10.4	68.8	20.8	5.4	83	0.8	0.1	8.3	2.5
6075020600	4.30	2.32	1-5% (lowest scores)	4711 San Francisco	6.1	84.7	9.2	9.8	75.2	2.1	0.2	8.9	3.8
6061021123	4.29	2.31	1-5% (lowest scores)	7397 Placer	11	72.4	16.6	8.8	80.9	0.7	0.5	5.8	3.3

6053013200	4.28	2.30	1-5% (lowest scores)	4225 Monterey	8.4	67	24.6	6.4	82.2	0.9	0.4	7.2	2.9
6037620305	4.28	2.28	1-5% (lowest scores)	6227 Los Angeles	11.3	78.5	10.2	5.9	85.3	0.5	0.1	4.8	3.2
6075021200	4.27	2.27	1-5% (lowest scores)	2779 San Francisco	9.1	80.3	10.6	7.8	77	1	0.3	9.3	4.6
6085511707	4.27	2.26	1-5% (lowest scores)	3009 Santa Clara	9.6	63.3	27.1	7.5	70.2	0.8	0.1	17.7	3.8
6075021800	4.26	2.24	1-5% (lowest scores)	3840 San Francisco	11.1	77.2	11.7	14.4	69.4	1.7	0.1	10	4.4
6013345203	4.23	2.23	1-5% (lowest scores)	6472 Contra Costa	10.9	71	18.1	8.1	82.5	0.6	0.2	5.5	3.1
6073017033	4.23	2.22	1-5% (lowest scores)	4694 San Diego	11.8	79.9	8.3	8.6	55.3	2.6	0.1	28	5.4
6081612900	4.22	2.21	1-5% (lowest scores)	4356 San Mateo	16.8	64.9	18.3	4.8	77.1	0.6	0	13.2	4.2
6085510200	4.22	2.19	1-5% (lowest scores)	4328 Santa Clara	14.3	68.7	17	3.9	70	0.4	0.1	21	4.5
6087100100	4.22	2.18	1-5% (lowest scores)	2163 Santa Cruz	11.1	75.8	13.1	14.3	76.2	0.7	0.4	4.6	3.7
6059062635	4.21	2.17	1-5% (lowest scores)	4039 Orange	12.7	81.6	5.7	12.8	67.2	1.3	0.1	13.6	4.9
6041132100	4.20	2.16	1-5% (lowest scores)	2311 Marin	7.6	73.7	18.7	12.7	81.2	0.6	0.2	1.6	3.8
6017030706	4.19	2.14	1-5% (lowest scores)	6020 El Dorado	12.4	74.8	12.8	9.7	79	1.3	0.5	5.9	3.7
6083000502	4.18	2.13	1-5% (lowest scores)	5874 Santa Barbara	10.8	70.9	18.3	13.6	80.6	0.5	0.1	2.9	2.2
6085507001	4.17	2.12	1-5% (lowest scores)	6504 Santa Clara	9.5	70.5	20	5.2	84.5	0.6	0.2	6.9	2.5
6059042336	4.17	2.11	1-5% (lowest scores)	4430 Orange	12.4	78.1	9.5	10.3	73.9	0.9	0.1	10.5	4.3
6061021106	4.15	2.09	1-5% (lowest scores)	2230 Placer	8.9	72.3	18.8	8.7	82.5	1.1	0.7	3.9	3.2
6001430102	4.13	2.08	1-5% (lowest scores)	2285 Alameda	8	70	22	10.2	67	2.8	0.4	14.8	4.8
6085508403	4.11	2.07	1-5% (lowest scores)	2817 Santa Clara	13.3	64.1	22.6	3.8	60	0.7	0	30.6	4.9
6059042319	4.10	2.06	1-5% (lowest scores)	3334 Orange	10.9	73.9	15.2	9.3	75	1.3	0.1	11	3.3
6053012401	4.10	2.04	1-5% (lowest scores)	1682 Monterey	4.8	67.7	27.5	7.7	82.7	1	0.3	5.2	3.1
6073008303	4.10	2.03	1-5% (lowest scores)	3446 San Diego	8.3	59.2	32.5	9.4	81.7	0.5	0.1	5.8	2.5
6087122002	4.09	2.02	1-5% (lowest scores)	3349 Santa Cruz	8.6	77.1	14.3	7.2	86.1	0.8	0.4	2.8	2.6
6059032050	4.05	2.01	1-5% (lowest scores)	4906 Orange	14.6	80.7	4.7	20.2	66.6	1.3	0.2	8	3.6
6067008509	4.05	1.99	1-5% (lowest scores)	4711 Sacramento	19.9	73.7	6.4	8.3	66.7	1.5	0.5	18.6	4.4
6067008501	4.04	1.98	1-5% (lowest scores)	6228 Sacramento	14.8	77.7	7.5	10.9	75.4	0.9	0.2	10	2.6
6013355112	4.04	1.97	1-5% (lowest scores)	5563 Contra Costa	8.1	74.4	17.5	6.2	76.8	2.1	0.3	11.6	3.1
6065045123	4.04	1.95	1-5% (lowest scores)	2356 Riverside	6.1	56.7	37.2	15.6	77.7	1.2	0.3	3.7	1.5
6089011402	4.03	1.94	1-5% (lowest scores)	3350 Shasta	10.4	72.5	17.1	9	82.4	0.5	1	4.6	2.6
6041116000	4.03	1.93	1-5% (lowest scores)	3070 Marin	13.3	74.8	11.9	5.4	87.8	0.7	0.3	2.2	3.6
6059032045	4.01	1.92	1-5% (lowest scores)	2978 Orange	18	78.6	3.4	11.7	76.5	0.5	0	7.2	4.2
6073021500	4.00	1.90	1-5% (lowest scores)	8846 San Diego	16.5	78.2	5.3	8.6	63.6	0.6	0.1	23.2	3.9
6059062631	3.98	1.89	1-5% (lowest scores)	3303 Orange	7.3	72.5	20.2	3.5	66.4	0.6	0.1	24.2	5.2
6073008311	3.97	1.88	1-5% (lowest scores)	2884 San Diego	10.1	65	24.9	8.6	82.6	0.2	0.1	5	3.5
6001400100	3.97	1.87	1-5% (lowest scores)	2937 Alameda	9.3	69.1	21.6	4	70.8	4.8	0.1	15.8	4.6
6037670328	3.93	1.85	1-5% (lowest scores)	4504 Los Angeles	9.3	68.9	21.8	5.6	70.4	1	0.1	19	3.8
6075030600	3.92	1.84	1-5% (lowest scores)	2221 San Francisco	12.7	70.7	16.6	7.9	60.7	1.6	0	25.3	4.5
6041115000	3.92	1.83	1-5% (lowest scores)	7249 Marin	13.4	72.3	14.3	4.9	88	0.8	0.2	3.5	2.5
6013351101	3.91	1.82	1-5% (lowest scores)	2594 Contra Costa	0	14.5	85.5	2	89.1	0.8	0	7.5	0.7
6001423800	3.90	1.80	1-5% (lowest scores)	2925 Alameda	9.3	68.5	22.2	4.4	83.9	1.6	0.2	6.2	3.7
6001421300	3.90	1.79	1-5% (lowest scores)	3844 Alameda	10.4	68	21.6	5.3	78.1	1.7	0.1	9.6	5.2
6017031405	3.89	1.78	1-5% (lowest scores)	2426 El Dorado	9.4	72.9	17.7	5.7	89.5	0.2	1.1	0.8	2.7
6073008365	3.87	1.77	1-5% (lowest scores)	2979 San Diego	10.7	82.4	6.9	5.9	52.2	1.5	0.1	37.3	2.9
6085509901	3.86	1.75	1-5% (lowest scores)	1934 Santa Clara	14.6	64.2	21.2	4.4	72	0.2	0	19	4.4
6017030701	3.86	1.74	1-5% (lowest scores)	6205 El Dorado	11.4	79.1	9.5	8.7	81.1	0.9	0.2	5.2	3.8
6085511701	3.86	1.73	1-5% (lowest scores)	4017 Santa Clara	9.9	66.7	23.4	2.1	67.6	0.5	0	25.6	4.1
6041114100	3.85	1.72	1-5% (lowest scores)	5133 Marin	10.3	77.6	12.1	5.9	86.6	1.2	0.3	2.5	3.4
6059032059	3.84	1.70	1-5% (lowest scores)	7975 Orange	27	70.7	2.3	14.5	66.2	1.2	0.2	12.9	4.9
6053012800	3.84	1.69	1-5% (lowest scores)	5154 Monterey	5.5	63.4	31.1	7.9	80.7	1.1	0.3	7.2	2.8
6085507206	3.83	1.68	1-5% (lowest scores)	2724 Santa Clara	10.1	70.4	19.5	4.8	76.3	0.4	0.1	15.1	3.4
6067008505	3.82	1.66	1-5% (lowest scores)	2186 Sacramento	15.1	75.5	9.4	6.2	72.7	0.6	0.4	16.2	3.9
6073017021	3.77	1.65	1-5% (lowest scores)	3177 San Diego	9	79.6	11.4	7.2	82.9	0.8	0.3	6.6	2.2
6081608800	3.77	1.64	1-5% (lowest scores)	5696 San Mateo	14.5	69.1	16.4	7	68.8	0.9	0.1	17.6	5.7
6083002915	3.76	1.63	1-5% (lowest scores)	580 Santa Barbara	12.5	85.6	1.9	16.4	52.6	3.4	0.2	21.4	6
6013350000	3.74	1.61	1-5% (lowest scores)	5512 Contra Costa	10.6	74.6	14.8	7.2	74.5	1.3	0.2	12	4.8
6073017006	3.73	1.60	1-5% (lowest scores)	2876 San Diego	9.6	70.3	20.1	7.5	81.7	0.9	0.4	7.2	2.4
6013355117	3.72	1.59	1-5% (lowest scores)	8379 Contra Costa	27.9	68.1	4	4.4	20.3	1.9	0.1	69.2	4.1
6037620901	3.72	1.58	1-5% (lowest scores)	2621 Los Angeles	14.8	70.8	14.4	5.3	83.5	1	0.2	6.9	3
6073017501	3.72	1.56	1-5% (lowest scores)	2769 San Diego	7.6	82.1	10.3	8.2	85.7	0.5	0.4	3.1	2.1
6059032043	3.70	1.55	1-5% (lowest scores)	3987 Orange	11.3	83.1	5.6	8.5	79.8	0.9	0.1	7.8	2.9
6037670500	3.69	1.54	1-5% (lowest scores)	1860 Los Angeles	7.8	64.6	27.6	5.5	74.1	1.5	0	16.3	2.6
6073017306	3.69	1.53	1-5% (lowest scores)	2818 San Diego	8.2	67.3	24.5	5.5	85.7	0.8	0	5.9	2.1
6073017107	3.68	1.51	1-5% (lowest scores)	2871 San Diego	12.3	80.6	7.1	7.2	83.1	0.3	0	6	3.4
6075021400	3.67	1.50	1-5% (lowest scores)	3264 San Francisco	9.7	81.8	8.5	12	71.5	1.1	0.1	10.8	4.5
6085508303	3.65	1.49	1-5% (lowest scores)	2562 Santa Clara	11.1	68.4	20.5	3.7	59.3	0.1	0.3	33.6	3
6073017044	3.60	1.48	1-5% (lowest scores)	5570 San Diego	18.5	77.4	4.1	7.2	56	1.6	0.3	30.2	4.7
6067008512	3.57	1.46	1-5% (lowest scores)	3819 Sacramento	22	72.7	5.3	8.9	66.4	1	0.1	19.9	3.7
6053013400	3.56	1.45	1-5% (lowest scores)	1624 Monterey	9.5	71.5	19	10.4	76.2	0.8	0.4	8	4.2
6041118100	3.55	1.44	1-5% (lowest scores)	2407 Marin	14.8	68	17.2	3.9	91.2	0.2	0	1.9	2.8
6013346203	3.55	1.43	1-5% (lowest scores)	3838 Contra Costa	12.5	70.1	17.4	6.1	83.1	0.4	0.1	6.9	3.4
6085510500	3.53	1.41	1-5% (lowest scores)	4688 Santa Clara	12.9	61	26.1	2.6	72.4	0.4	0	20.9	3.6
6075020500	3.50	1.40	1-5% (lowest scores)	2583 San Francisco	5.8	84.4	9.8	7.4	77.4	1.7	0.3	9.1	4.1
6073008006	3.49	1.39	1-5% (lowest scores)	3805 San Diego	7.2	79.8	13	9	83.6	0.7	0.2	3.3	3.2
6057001205	3.48	1.37	1-5% (lowest scores)	4537 Nevada	13.4	80.9	5.7	5.1	91.3	0.2	0.4	1.2	1.8
6087122203	3.46	1.36	1-5% (lowest scores)	3622 Santa Cruz	10.7	70.1	19.2	9.5	83.7	0.6	0.4	3.3	2.5
6085511705	3.46	1.35	1-5% (lowest scores)	995 Santa Clara	10.5	68.4	21.1	4.6	66.7	2	0.1	22.8	3.7
6053012000	3.44	1.34	1-5% (lowest scores)	3563 Monterey	11	72.7	16.3	18	67.9	1.5	0.5	8.3	3.8
6079010404	3.43	1.32	1-5% (lowest scores)	2249 San Luis Obispo	8.7	62.1	29.2	28.4	68.3	0.4	0.2	1.1	1.6
6013326000	3.40	1.31	1-5% (lowest scores)	3437 Contra Costa	12.9	66.8	20.3	7.8	81.6	0.8	0.1	6.3	3.4
6081609800	3.40	1.30	1-5% (lowest scores)	4492 San Mateo	12.6	72.4	15	17.3	69.4	0.7	0.2	8.2	4.3
6061021204	3.36	1.29	1-5% (lowest scores)	2482 Placer	9.2	74	16.8	9.3	84	0.7	1.4	2.1	2.6
6037920032	3.35	1.27	1-5% (lowest scores)	2897 Los Angeles	15.4	79.5	5.1	21.9	57.6	4.6	0.1	12.6	3.2
6013345112	3.35	1.26	1-5% (lowest scores)	6513 Contra Costa	16.2	77.2	6.6	8	48.9	3.4	0.2	34.8	4.7
6085510802	3.34	1.25	1-5% (lowest scores)	1840 Santa Clara	12.8	64.9	22.3	4.4	63.7	2.1	0	25.5	4.2
6037670406	3.33	1.24	1-5% (lowest scores)	1903 Los Angeles	9.5	69.6	20.9	3.8	46.8	1.4	0.1	43.9	4.1
6059063008	3.31	1.22	1-5% (lowest scores)	857 Orange	3	54.9	42.1	5.8	87.9	0.8	0.1	4.6	0.8
6097153502	3.29	1.21	1-5% (lowest scores)	3684 Sonoma	7.9	74.7	17.4	10.3	84.6	0.7	0.4	1.7	2.4
6053012402	3.29	1.20	1-5% (lowest scores)	2987 Monterey	7.9	69.6	22.5	8.3	81.5	0.9	0.4	5.6	3.3
6053010702	3.29	1.19	1-5% (lowest scores)	3911 Monterey	7.9	69.5	22.6	9.7	83.3	0.3	0.3	4	2.5
6061022011	3.28	1.17	1-5% (lowest scores)	1686 Placer	10	78.6	11.4	10.6	85.1	0.2	0.2	2.2	1.7
6081605700	3.26	1.16	1-5% (lowest scores)	5273 San Mateo	12.4	68.4	19.2	3	63.4	0.5	0	29.3	3.8
6081605800	3.24	1.15	1-5% (lowest scores)	2640 San Mateo	12.5	69.4	18.1	7	78.1	0.7	0.1	10.6	3.4
6037800101	3.23	1.14	1-5% (lowest scores)	5485 Los Angeles	10.8	73.4	15.8	5.4	84.4	1	0.2	5.7	3.4
6013355306	3.16	1.12	1-5% (lowest scores)	4922 Contra Costa	9.9	74.2	15.9	9.9	81.2	1	0.3	4.4	3.2
6013353001	3.15	1.11	1-5% (lowest scores)	3521 Contra Costa	11.5	72.6	15.9	5.3	75.9	1.1	0.1	13.8	3.9
6083002907	3.15	1.10	1-5% (lowest scores)	4190 Santa Barbara	8.6	70.5	20.9	12.5	78.2	0.5	0.3	5.8	2.6
6037620904	3.14	1.08	1-5% (lowest scores)	2888 Los Angeles	12.5	74.2	13.3	6.1	86.5	0.8	0	3.9	2.8
6053012200	3.13	1.07	1-5% (lowest scores)	2683 Monterey	9.2	72.9	17.9	9.4	81.1	1.4	0.1	4.1	3.9
6001421400	3.11	1.06	1-5% (lowest scores)	1593 Alameda	9.7	67.3	23	3.9	82.3	1.8	0.1	7.9	4
6085511910	3.10	1.05	1-5% (lowest scores)	3042 Santa Clara	12.4	69.3	18.3	5.4	75	0.9	0.3	16.3	2.2
6053011700	3.08	1.03	1-5% (lowest scores)	3810 Monterey	8.2	61	30.8	5.8	87.5	0.3	0.1	4.3	2
6061021604	3.06	1.02	1-5% (lowest scores)	3161 Placer	8.6	68	23.4	8.2	88.3	0.2	0.8	1.2	1.3
6013355116	3.06	1.01	1-5% (lowest scores)	5664 Contra Costa	25.7	70.5	3.8	4.3	23.4	1.8	0.1	65.5	4.9
6073017305	3.05	1.00	1-5% (lowest scores)	2969 San Diego	10.2	63	26.8	5.8	85.6	0.4	0.3	5.4	2.5
6061021122	3.04	0.98	1-5% (lowest scores)	3463 Placer	11.4	67.4	21.2	8.5	80.2	1	0.1	7.5	2.7
6085511702	3.04	0.97	1-5% (lowest scores)	2684 Santa Clara	13.2	66.6	20.2	2.8	69.2	0.6	0	22.8	4.6
6079010403	3.02	0.96	1-5% (lowest scores)	3788 San Luis Obispo	6.6	60.2	33.2	14.6	81.6	0.2	0.6	1.7	1.3
6075060100	2.98	0.95	1-5% (lowest scores)	3235 San Francisco	16.2	81.6	2.2	7.7	76	2	0.2	8.5	5.4
6073017047	2.95	0.93	1-5% (lowest scores)	4021 San Diego	14.6	75	10.4	9.2	74.8	1.4	0.2	10.7	3.7
6073007200	2.94	0.92	1-5% (lowest scores)	5493 San Diego	7.3	77.4	15.3	7.5	86.7	1	0.2	2.3	2.4
6013346201	2.93	0.91	1-5% (lowest scores)	7181 Contra Costa	10.8	71.1	18.1	5	85.4	0.5	0.1	6.1	3
6073008310	2.90	0.90	1-5% (lowest scores)	5392 San Diego	10.1	60.8	29.1	9.3	79	0.6	0.1	7.7	3.4
6085510300	2.89	0.88	1-5% (lowest scores)	4020 Santa Clara	13	66.5	20.5	3.6	72.1	0.4	0	20.5	3.3
6073017200	2.89	0.87	1-5% (lowest scores)	4146 San Diego	6	73.2	20.8	4.2	90.6	0.2	0	2.8	2.1
6041124100	2.89	0.86	1-5% (lowest scores)	5441 Marin	14.1	69	16.9	5.3	83.4	0.9	0.1	6.3	4
6097151503	2.86	0.84	1-5% (lowest scores)	3572 Sonoma	7.9	71.6	20.5	4.9	89.5	0.3	0.3	3	2.1
6041114200	2.81	0.83	1-5% (lowest scores)	3087 Marin	11.1	73.6	15.3	7.5	84.5	1.4	0.2	3.2	3.2
6053012302	2.79	0.82	1-5% (lowest scores)	1872 Monterey	8.1	75.1	16.8	9.1	81.5	1.7	0.6	4.5	2.6
6083000501	2.78	0.81	1-5% (lowest scores)	3263 Santa Barbara	8.2	68.9	22.9	8.3	87.1	0.4	0.2	2.1	1.9
6059032058	2.75	0.79	1-5% (lowest scores)	7312 Orange	27.8	69.9	2.3	11.4	71	1.4	0.1	12.1	4
6089011801	2.72	0.78	1-5% (lowest scores)	2464 Shasta	10.1	72.7	17.2	6.2	87.1	0.7	1.7	1.4	3
6073008336	2.72	0.77	1-5% (lowest scores)	2332 San Diego	11.2	80.8	8	7.9	65.4	1.2	0.3	21.3	4
6017030709	2.71	0.76	1-5% (lowest scores)	4806 El Dorado	12.8	77	10.2	7.2	82.9	1.1	0.5	4.9	3.3

6017031700	2.71	0.74	1-5% (lowest scores)	2648 El Dorado	19	73.1	7.9	6.2	75.8	1.6	0.4	12.7	3.3
6013352202	2.70	0.73	1-5% (lowest scores)	2548 Contra Costa	7.7	63.8	28.5	3.9	76.7	0.4	0.1	14.8	4.2
6059032042	2.70	0.72	1-5% (lowest scores)	5796 Orange	10.6	85.2	4.2	10.9	78.7	1.2	0.2	5.4	3.5
6081609602	2.69	0.71	1-5% (lowest scores)	1667 San Mateo	13.3	69.3	17.4	8	73.4	0.7	0.1	12.2	5.5
6037621002	2.66	0.69	1-5% (lowest scores)	1093 Los Angeles	7.5	80.4	12.1	6.9	84.7	1.4	0.2	3.2	3.7
6013355114	2.63	0.68	1-5% (lowest scores)	11035 Contra Costa	18.8	74.1	7.1	7.1	47.4	2	0.1	39	4.5
6085507002	2.63	0.67	1-5% (lowest scores)	2800 Santa Clara	11.3	69.7	19	4.2	84.6	0.6	0	6.7	3.8
6013391000	2.62	0.66	1-5% (lowest scores)	2556 Contra Costa	10.4	67.2	22.4	5.8	74.8	2.5	0.1	11.8	5
6075012901	2.59	0.64	1-5% (lowest scores)	2557 San Francisco	4.1	86.5	9.4	6.2	76.8	0.8	0.1	13.5	2.7
6081611500	2.59	0.63	1-5% (lowest scores)	2677 San Mateo	12.6	65.9	21.5	3	78.9	0.3	0.1	14.2	3.5
6061020606	2.56	0.62	1-5% (lowest scores)	4303 Placer	10.4	82.8	6.8	5.2	76.9	1.1	0.3	12.5	4.1
6085510100	2.54	0.61	1-5% (lowest scores)	2948 Santa Clara	13.2	64.4	22.4	4.9	67.6	0.3	0.1	23.1	3.9
6001426100	2.52	0.59	1-5% (lowest scores)	5922 Alameda	12.3	69.1	18.6	3.3	72.8	1.2	0.1	18.1	4.6
6013353002	2.49	0.58	1-5% (lowest scores)	4078 Contra Costa	12.3	67.4	20.3	4.9	78.7	0.5	0.2	11.7	4
6053011802	2.44	0.57	1-5% (lowest scores)	1830 Monterey	5.1	53.8	41.1	3.1	91.6	0.1	0.2	3.3	1.7
6013355113	2.44	0.55	1-5% (lowest scores)	4985 Contra Costa	11.4	79.2	9.4	5.3	64.9	1.8	0.2	23.7	4.2
6053012100	2.44	0.54	1-5% (lowest scores)	2263 Monterey	7.6	59.8	32.6	7.7	80.8	1.1	0.1	6.8	3.4
6083001500	2.35	0.53	1-5% (lowest scores)	3091 Santa Barbara	8.3	61.4	30.3	5.5	90.9	0.4	0.1	1.7	1.4
6041127000	2.34	0.52	1-5% (lowest scores)	4579 Marin	13.8	69.9	16.3	4.4	87.9	0.7	0.1	3.6	3.3
6075020401	2.31	0.50	1-5% (lowest scores)	2846 San Francisco	5	85.3	9.7	7.4	75.7	2	0.1	11.2	3.6
6055201403	2.29	0.49	1-5% (lowest scores)	800 Napa	7.9	73.8	18.3	17.8	77.4	1.2	0.4	1.9	1.4
6081612700	2.26	0.48	1-5% (lowest scores)	2202 San Mateo	15.5	65.6	18.9	4.2	85	0.1	0	7.7	3
6083000103	2.21	0.47	1-5% (lowest scores)	3196 Santa Barbara	8.6	67.8	23.6	9.1	84.3	0.2	0.1	4.1	2.2
6053013100	2.20	0.45	1-5% (lowest scores)	1930 Monterey	33.4	66.4	0.2	7	72.3	5.3	0.1	10.4	4.9
6013346102	2.18	0.44	1-5% (lowest scores)	5650 Contra Costa	10.3	71.3	18.4	5.8	80.8	0.6	0	9.8	2.9
6059062642	2.18	0.43	1-5% (lowest scores)	2832 Orange	7.6	54.2	38.2	3.1	89.5	0.4	0	5.2	1.7
6013352101	2.18	0.42	1-5% (lowest scores)	3141 Contra Costa	6.6	77.5	15.9	10.2	67.4	3.6	0.2	13.3	5.2
6013346204	2.17	0.40	1-5% (lowest scores)	7278 Contra Costa	13.4	76.5	10.1	6	75.9	0.7	0.2	12.5	4.7
6013345204	2.17	0.39	1-5% (lowest scores)	3586 Contra Costa	12.9	70	17.1	5	87.2	0.2	0.1	5.1	2.5
6041102100	2.12	0.38	1-5% (lowest scores)	2295 Marin	9	74.3	16.7	8.9	81.1	1.1	0.3	5.4	3.2
6073008324	2.11	0.37	1-5% (lowest scores)	6600 San Diego	9.3	70.4	20.3	5.5	82.5	0.7	0.1	7.9	3.3
6001404600	2.05	0.35	1-5% (lowest scores)	4353 Alameda	11.5	71.2	17.3	5.5	73	6	0.1	10.3	5.1
6001421600	2.04	0.34	1-5% (lowest scores)	3558 Alameda	8.4	67.5	24.1	5.3	77.2	1.6	0.1	10.5	5.4
6085507302	1.98	0.33	1-5% (lowest scores)	2725 Santa Clara	9.5	67.2	23.3	4.4	70.5	0.3	0.1	21.2	3.5
6013354002	1.98	0.32	1-5% (lowest scores)	6590 Contra Costa	11.5	63.8	24.7	3.7	82.9	0.7	0	8.9	3.8
6085510400	1.93	0.30	1-5% (lowest scores)	3131 Santa Clara	14	68.2	17.8	4.8	63.1	0.5	0.1	27.1	4.4
6041113000	1.85	0.29	1-5% (lowest scores)	3656 Marin	9.3	75.9	14.8	6.5	87.8	0.8	0.2	1.3	3.4
6013347000	1.85	0.28	1-5% (lowest scores)	6171 Contra Costa	10.5	72.1	17.4	6.6	77.9	1.4	0.1	10.1	3.9
6013346101	1.81	0.26	1-5% (lowest scores)	3433 Contra Costa	9.8	70.5	19.7	5.2	79.1	0.9	0.1	12.1	2.5
6001400200	1.81	0.25	1-5% (lowest scores)	1974 Alameda	12	71.6	16.4	7.6	78.3	1.6	0.1	7.4	5
6013345113	1.76	0.24	1-5% (lowest scores)	4337 Contra Costa	13.1	77.4	9.5	5.9	68.1	1.2	0	20.9	3.9
6001421200	1.75	0.23	1-5% (lowest scores)	3563 Alameda	9	66.9	24.1	5.4	79.7	2	0	8.4	4.4
6085506804	1.75	0.21	1-5% (lowest scores)	3629 Santa Clara	15	70	15	6.9	75.5	0.3	0.2	13.3	3.9
6013352201	1.73	0.20	1-5% (lowest scores)	5750 Contra Costa	11.8	70.2	18	6.4	70.9	1.2	0.1	17.4	4
6073008331	1.72	0.19	1-5% (lowest scores)	2466 San Diego	13.5	79.8	6.7	5.9	76.7	0.4	0	13.5	3.5
6061020105	1.72	0.18	1-5% (lowest scores)	1352 Placer	7.7	76.8	15.5	3.6	90.7	0.4	0.7	2	2.6
6059042332	1.66	0.16	1-5% (lowest scores)	5399 Orange	9.9	74.8	15.3	6.9	82.6	0.7	0	7.1	2.6
6013351200	1.64	0.15	1-5% (lowest scores)	5812 Contra Costa	12.8	70.5	16.7	4.6	83.5	0.4	0.2	7.9	3.5
6001421100	1.47	0.14	1-5% (lowest scores)	1992 Alameda	9.5	63.3	27.2	5	76.5	1.8	0	12	4.6
6041119100	1.45	0.13	1-5% (lowest scores)	4609 Marin	11.4	68.7	19.9	5.1	88.4	0.4	0.1	3.1	2.9
6053011604	1.42	0.11	1-5% (lowest scores)	1913 Monterey	4.2	56.8	39	5	88.9	0.7	0.1	3.1	2.3
6041126100	1.39	0.10	1-5% (lowest scores)	5808 Marin	15.4	69.4	15.2	4	88.7	0.4	0	3.3	3.6
6037262802	1.31	0.09	1-5% (lowest scores)	3759 Los Angeles	13.1	65.5	21.4	3.6	88.8	0.7	0.1	4.2	2.7
6097154303	1.28	0.08	1-5% (lowest scores)	1720 Sonoma	5	55.5	39.5	9.2	86.5	0.9	0.6	1	1.7
6053011602	1.26	0.06	1-5% (lowest scores)	5266 Monterey	5.6	53.8	40.6	4.9	87.6	0.6	0.2	4.7	2
6053011801	1.16	0.05	1-5% (lowest scores)	1885 Monterey	6.3	63.3	30.4	6.2	88.4	0.4	0.2	2.7	2.1
6073008102	1.09	0.04	1-5% (lowest scores)	3395 San Diego	12.1	70.8	17.1	6.7	86.3	0.4	0.2	3.2	3.2
6013352102	1.06	0.03	1-5% (lowest scores)	5586 Contra Costa	10.1	73.3	16.6	7.3	74.8	1.3	0.1	12.2	4.3
6013392000	0.98	0.01	1-5% (lowest scores)	2451 Contra Costa	11.5	66.7	21.8	4.6	74.8	2.4	0	12	6.2
6001422600	NA	NA	NA	1215 Alameda	0.1	99.3	0.6	11.6	44.3	0.8	0.2	37.5	5.6
6001981900	NA	NA	NA	38 Alameda	0	100	0	10.5	63.2	10.5	0	10.5	5.3
6001982000	NA	NA	NA	71 Alameda	1.4	95.8	2.8	15.5	64.8	4.2	1.4	12.7	1.4
6001983200	NA	NA	NA	540 Alameda	2.6	92.4	5	10.7	53.5	13.9	0.6	17.6	3.7
6009000504	NA	NA	NA	942 Calaveras	6.5	69.6	23.9	6.3	88.7	0.1	0.2	1.7	3
6017031900	NA	NA	NA	133 El Dorado	6.8	72.1	21.1	4.5	79.7	0	1.5	7.5	6.8
6019007901	NA	NA	NA	5652 Fresno	0	95.9	4.1	36.9	33.3	26.7	0.9	0.8	1.4
6025010101	NA	NA	NA	4601 Imperial	0.8	96.3	2.9	45.1	19	32.8	0.7	1.9	0.6
6029003900	NA	NA	NA	2250 Kern	4.6	92.2	3.2	47.2	36.2	13.6	0.4	1.1	1.4
6029004302	NA	NA	NA	5710 Kern	0	99.5	0.5	46	28.4	23	0.9	0.7	1
6029004601	NA	NA	NA	5363 Kern	0	99.1	0.9	37.2	26.7	35.4	0.4	0	0.2
6029004603	NA	NA	NA	490 Kern	0	100	0	58.2	21.2	20.2	0.4	0	0
6029006002	NA	NA	NA	5906 Kern	0	98.8	1.2	47.2	31.9	19.1	0.6	0.9	0.4
6031001602	NA	NA	NA	12118 Kings	0	97.5	2.5	45	24.6	26.4	0.7	0.4	3
6031981800	NA	NA	NA	6423 Kings	0	96.8	3.2	44.3	27.6	23.2	0.9	0.8	3.2
6037207400	NA	NA	NA	1363 Los Angeles	0.2	95.8	4	48.3	20.6	21.9	0.3	7.3	1.5
6037265301	NA	NA	NA	9344 Los Angeles	0	100	0	15.2	31.6	3.2	0	43.6	6.4
6037320000	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037402404	NA	NA	NA	1945 Los Angeles	0.1	99.8	0.1	24.2	42.4	6.2	0.1	19.8	7.4
6037403200	NA	NA	NA	391 Los Angeles	0	90.3	9.7	18.4	69.1	7.4	0	4.6	0.5
6037504102	NA	NA	NA	22 Los Angeles	9	91	0	31.8	22.7	27.3	0	18.2	0
6037532400	NA	NA	NA	112 Los Angeles	4.5	83	12.5	42.9	51.8	3.6	0	1.8	0
6037551600	NA	NA	NA	31 Los Angeles	0	100	0	35.5	16.1	38.7	0	9.7	0
6037574601	NA	NA	NA	1863 Los Angeles	0.4	99.3	0.3	22.1	48.9	5.9	0.2	16	6.9
6037574700	NA	NA	NA	117 Los Angeles	0	53	47	10.3	53.8	30.8	0	5.1	0
6037575500	NA	NA	NA	76 Los Angeles	10.5	76.3	13.2	50	30.3	5.3	0	14.5	0
6037599100	NA	NA	NA	527 Los Angeles	8.9	89.2	1.9	30	65.1	0.4	0.2	2.3	2.1
6037701100	NA	NA	NA	746 Los Angeles	6	75.2	18.8	10.7	40.5	44	0.3	2.5	2
6037901003	NA	NA	NA	6188 Los Angeles	0	99.2	0.8	48.1	14.1	30.9	0.5	2	4.5
6037910811	NA	NA	NA	305 Los Angeles	4.2	86	9.8	28.9	58.4	7.9	2	1	2
6037910812	NA	NA	NA	464 Los Angeles	7.3	80.8	11.9	10.8	81	0.2	0.9	0.9	6.2
6037920011	NA	NA	NA	286 Los Angeles	5.9	86.1	8	24.5	62.9	8.7	0	1	2.8
6037920026	NA	NA	NA	419 Los Angeles	5	76.4	18.6	19.8	74.5	0	1	2.6	2.1
6037920200	NA	NA	NA	6920 Los Angeles	0	99.8	0.2	59.4	9.9	29.5	0	0.4	0.8
6037930101	NA	NA	NA	119 Los Angeles	5.1	86.5	8.4	20.2	67.2	2.5	0	10.1	0
6037980001	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980002	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980003	NA	NA	NA	2 Los Angeles	0	0	100	0	100	0	0	0	0
6037980004	NA	NA	NA	169 Los Angeles	18.9	78.1	3	39.1	46.7	8.9	0.6	1.2	3.6
6037980005	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980006	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980007	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980008	NA	NA	NA	145 Los Angeles	26.2	67.6	6.2	78.6	19.3	2.1	0	0	0
6037980009	NA	NA	NA	14 Los Angeles	7.1	85.8	7.1	35.7	57.1	0	0	0	7.1
6037980013	NA	NA	NA	59 Los Angeles	40.6	57.7	1.7	79.7	11.9	5.1	0	3.4	0
6037980014	NA	NA	NA	239 Los Angeles	1.7	75.7	22.6	13.4	76.6	5	0	3.3	1.7
6037980015	NA	NA	NA	554 Los Angeles	14.9	83.3	1.8	48.9	19.7	17.3	0.5	10.5	3.1
6037980018	NA	NA	NA	1 Los Angeles	0	0	100	0	100	0	0	0	0
6037980019	NA	NA	NA	173 Los Angeles	8.1	72.2	19.7	15.6	71.1	1.7	0	8.7	2.9
6037980020	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980021	NA	NA	NA	33 Los Angeles	9.1	87.9	3	6.1	57.6	0	0	27.3	9.1
6037980022	NA	NA	NA	4 Los Angeles	0	100	0	25	75	0	0	0	0
6037980023	NA	NA	NA	8 Los Angeles	0	87.5	12.5	25	50	0	0	0	25
6037980024	NA	NA	NA	186 Los Angeles	12.9	71	16.1	12.4	72.6	1.6	0	10.8	2.7
6037980025	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980026	NA	NA	NA	20 Los Angeles	0	90	10	5	85	0	0	0	10
6037980028	NA	NA	NA	4 Los Angeles	0	75	25	50	0	50	0	0	0
6037980030	NA	NA	NA	0 Los Angeles	0	100	0	NA	NA	NA	NA	NA	NA
6037980031	NA	NA	NA	1262 Los Angeles	0.4	89.5	10.1	30.9	40.6	17.5	1.9	5.9	3.2
6037980033	NA	NA	NA	61 Los Angeles	0	80.3	19.7	13.1	57.4	4.9	0	19.7	4.9
6041122000	NA	NA	NA	4854 Marin	0	98.3	1.7	19.7	32.4	40.5	2	1.3	4.1
6043000400	NA	NA	NA	1802 Mariposa	6.3	88.4	5.3	9.5	80.6	1.7	2.1	2.7	3.4
6053010900	NA	NA	NA	10109 Monterey	0	97.4	2.6	43.9	23.2	26.8	1	4.4	0.6
6053011502	NA	NA	NA	1710 Monterey	7.7	79	13.3	22.5	73.9	0.2	0.4	1.4	1.7

6053012600	NA	NA	NA	2254	Monterey	1.7	97.8	0.5	8.7	77	4.9	0.6	3.5	5.3
6053014104	NA	NA	NA	1611	Monterey	0	100	0	20.3	47.8	3.3	0.6	25.2	2.9
6053980000	NA	NA	NA	7	Monterey	0	100	0	100	0	0	0	0	0
6055200900	NA	NA	NA	1230	Napa	0.4	92.9	6.7	18.4	52	21.8	1.1	6.2	0.6
6059021813	NA	NA	NA	25	Orange	0	76	24	20	44	0	0	36	0
6059052404	NA	NA	NA	549	Orange	0.4	99.2	0.4	56.3	32.2	4	0.2	6.7	0.5
6059980000	NA	NA	NA	19	Orange	0	94.7	5.3	10.5	57.9	5.3	0	26.3	0
6061022200	NA	NA	NA	909	Placer	7.6	81.9	10.5	8	88.9	0.3	0.2	1	1.5
6065043814	NA	NA	NA	905	Riverside	0.5	37.8	61.7	6.9	88.1	2.4	0.4	0.3	1.9
6065046601	NA	NA	NA	4888	Riverside	0.9	95.5	3.6	35.7	31.2	31.2	0.8	0.8	0.3
6065940100	NA	NA	NA	166	Riverside	2.4	51.8	45.8	1.8	92.8	0	0.6	0	4.8
6065980004	NA	NA	NA	9	Riverside	0	88.9	11.1	0	77.8	0	0	0	22.2
6065981000	NA	NA	NA	7634	Riverside	0	94.7	5.3	51.6	18.5	26	0.9	0.8	2.2
6067007101	NA	NA	NA	253	Sacramento	11.5	71.1	17.4	12.3	79.1	1.2	0.4	5.5	1.6
6067988300	NA	NA	NA	6747	Sacramento	0	99.5	0.5	25.6	20.3	46.8	0.8	1.7	4.7
6071012300	NA	NA	NA	1513	San Bernardino	0	94.4	5.6	22.9	41.3	30.1	0.4	5.1	0.1
6071980100	NA	NA	NA	0	San Bernardino	0	100	0	NA	NA	NA	NA	NA	NA	
6071980200	NA	NA	NA	4499	San Bernardino	0.1	98.5	1.4	38.2	19.8	31.1	5.1	3.5	2.2
6073003800	NA	NA	NA	6530	San Diego	0	100	0	15.7	53.5	17.7	0.9	7.5	4.7
6073005500	NA	NA	NA	198	San Diego	0	94.4	5.6	17.2	51.5	14.1	1.5	10.6	5.1
6073006200	NA	NA	NA	144	San Diego	0	79.2	20.8	2.8	88.2	1.4	0	2.8	4.9
6073006300	NA	NA	NA	3435	San Diego	0.1	99.8	0.1	18.7	69.9	4.1	1.3	3	3
6073009901	NA	NA	NA	626	San Diego	0.7	99.3	0	13.9	70	10.1	0.8	3.2	2.1
6073009902	NA	NA	NA	2	San Diego	0	0	100	0	100	0	0	0	0
6073011300	NA	NA	NA	6520	San Diego	0.4	99.5	0.1	17.3	52.5	18.8	1.2	6.5	3.7
6075980200	NA	NA	NA	320	San Francisco	4.4	52.2	43.4	7.8	67.5	11.2	0.6	10.3	2.5
6075980300	NA	NA	NA	171	San Francisco	0.6	96.5	2.9	11.1	75.4	7	0.6	3.5	2.3
6075980900	NA	NA	NA	350	San Francisco	2.9	92.5	4.6	23.1	52.9	10.6	0.3	8.6	4.6
6079011400	NA	NA	NA	6446	San Luis Obispo	0	97.1	2.9	29.2	23.8	39.6	0.9	0.3	6.1
6079012800	NA	NA	NA	1107	San Luis Obispo	1.2	95.8	3	25.8	40.8	26.1	1	4.8	1.4
6081984300	NA	NA	NA	0	San Mateo	0	100	0	NA	NA	NA	NA	NA	NA	
6083002604	NA	NA	NA	3582	Santa Barbara	0.8	97.4	1.8	49.6	23.7	16	1.6	6	3
6083980000	NA	NA	NA	10	Santa Barbara	0	90	10	0	90	0	0	10	0
6083980100	NA	NA	NA	11	Santa Barbara	9.1	81.8	9.1	18.2	54.5	0	0	0	27.3
6085504417	NA	NA	NA	323	Santa Clara	6.5	84.2	9.3	14.6	37.5	2.5	1.2	42.1	2.2
6085511608	NA	NA	NA	2687	Santa Clara	0.2	99.6	0.2	12	46	6.8	1.1	24.1	10
6095253000	NA	NA	NA	7810	Solano	0	95.8	4.2	20.2	27	43.2	1.4	0.4	7.9
6095980000	NA	NA	NA	16	Solano	25	62.5	12.5	56.2	18.8	12.5	0	0	12.5
6107004000	NA	NA	NA	560	Tulare	0.4	93.9	5.7	22.9	54.1	18.9	1.1	2.7	0.4
6109985202	NA	NA	NA	3590	Tuolumne	0	99.1	0.9	37.9	30.8	24.7	1.1	0.5	5
6111003012	NA	NA	NA	321	Ventura	13.4	73.8	12.8	84.7	13.1	0	0.3	1.9	0
6111980000	NA	NA	NA	56	Ventura	0	100	0	14.3	71.4	8.9	0	5.4	0

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SOUTH CENTRAL NEIGHBORS UNITED

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF FRESNO

SOUTH CENTRAL NEIGHBORS UNITED, Petitioner, v. CITY OF FRESNO, CITY COUNCIL OF FRESNO, and DOES 1-20, Respondents. RICHARD CAGLIA; CAGLIA ENVIRONMENTAL LLC dba CAGLIA ENVIRONMENTAL; and DOES 21-40, Real Parties in Interest.	Case No. **PETITION FOR WRIT OF MANDATE AND COMPLAINT FOR INJUNCTIVE RELIEF** CCP § 1094.5 (Alternatively CCP § 1085); Public Resources Code § 21000 et seq. ("CEQA"); State Planning & Zoning Law; City of Fresno Municipal Code

INTRODUCTION

1. This action challenges the January 25, 2018 decision of the Fresno City Council to approve Development Permit Application No. D-16-109, which would allow a massive new industrial park on undeveloped land in the City of Fresno ("Industrial Park Project" or "Project"). The Project would operate directly across the street from a residential community that already bears a disproportionate burden of environmental and public health impacts from industrial warehouses and distribution centers, hazardous and solid waste sites, and other noxious development in Fresno. This petition and complaint ("Petition") challenges the City Council's reliance on the environmental assessment and mitigated negative declaration prepared for the Project ("MND"). The City failed to ensure that the MND disclosed, analyzed, and mitigated the Project's many foreseeable public health and environmental impacts as required by the California Environmental Quality Act ("CEQA"), Public Resources Code Sections 21000 *et seq*., and the CEQA Guidelines, Title 14, California Code of Regulations Sections 15000 *et seq*.

2. The City further failed to ensure the Industrial Park Project's consistency with the City's General Plan and the Roosevelt Community Plan. These plans contain multiple requirements designed to ensure that the City does not approve new development without confirming that adequate water supply exists to serve the development. In approving the Project, however, the City did not comply with these requirements. It therefore violated the City's own mandate that the Project be consistent with the General Plan and any other applicable plan, like the Roosevelt Community Plan.

3. Finally, the City failed to comply with numerous requirements set forth in its Municipal Code prior to approving the Industrial Park Project. Many of these requirements are specifically designed to mitigate public health and environmental impacts from new development like the Industrial Park Project, but the City approved the Project without demonstrating how it would satisfy the Municipal Code's obligations.

PARTIES

4. Petitioner South Central Neighbors United is an unincorporated association with members who live within the immediate vicinity and within one mile of the Industrial Park

Project site. South Central Neighbors United is dedicated to preventing environmental degradation and to the improvement of environmental quality in the neighborhoods along East Central Avenue between State Highways 99 and 41, other neighborhoods (including Daleville, East Britten Avenue, East Malaga Avenue, and the Flamingo Mobile Home Park), and the region, and to ensuring that residents in the City of Fresno and County of Fresno enjoy a decent quality of life. South Central Neighbors United and its members participated in the administrative process leading up to the City's approval of the Industrial Park Project, objecting to the Project and warning the City of the illegalities identified in this lawsuit. The maintenance and prosecution of this action will confer a substantial benefit on the public by protecting the public from the environmental and other harms alleged herein and by ensuring that the City abides by the procedures required under law in approving development projects like the one at issue here. South Central Neighbors United is beneficially interested in this matter because it has a direct interest in ensuring that the Respondents fulfill their duties to comply with CEQA, State law, and the City's own municipal code and ordinances. South Central Neighbors United has an interest in preserving and protecting, for the general public, the environment and character of Fresno.

5. Respondent City of Fresno is a charter city in the State of California responsible for administering and carrying out its laws and applicable state laws. The City is the "lead agency" for the purposes of Public Resources Code Section 21067, with principal responsibility for conducting environmental review of proposed actions. The City has a duty to comply with CEQA, state law, and its own ordinances.

6. Respondent City Council of the City of Fresno is, and at all times herein mentioned was, the duly elected decisionmaking body of Respondent City. As the decisionmaking body, the City Council was charged with responsibilities under CEQA for conducting a proper review of the proposed action's environmental impacts and granting the various approvals necessary for the Project.

7. Petitioner is unaware of the true names and capacities of Respondents fictitiously named Does 1 through 20 and sues such respondents by fictitious names. Petitioner is informed

and believes, and on that basis alleges, that the fictitiously named respondents are also responsible for the actions described in this Petition. When the true identities and capacities of these Respondents have been determined, Petitioner will amend this petition, with leave of the court if necessary, to insert such identities and capacities.

8. Petitioner is informed and believes, and thereon alleges that Real Parties in Interest Richard Caglia and Caglia Environmental, LLC are, and at all times herein mentioned were, the applicants for the approvals granted by the City for the Industrial Park Project. Petitioner is further informed and believes, and thereon alleges, that Caglia Environmental, LLC was at all times herein mentioned doing business as Caglia Environmental.

9. Petitioner is unaware of the true names and capacities of Real Parties in Interest Does 21 through 40 and sue such real parties in interest by fictitious names. Petitioner is informed and believes, and on that basis alleges, that the fictitiously named real parties in interest are directly and materially affected by the actions described in this Petition. When the true identities and capacities of these real parties in interest have been determined, Petitioner will amend this Petition, with leave of the court if necessary, to insert such identities and capacities.

JURISDICTION AND VENUE

10. This Court has jurisdiction of the matters alleged herein pursuant to Code of Civil Procedure Sections 526, 527, 1085, 1087, and 1094.5, Public Resources Code Sections 21168 and 21168.5, and Fresno Municipal Code Section 15-6308.

11. Venue for this action properly lies in the Superior Court for the State of California in and for the County of Fresno pursuant to Code of Civil Procedure Section 394. Respondents' main offices are located in and the activities authorized by Respondents will occur in the City of Fresno, which is located in Fresno County.

12. Petitioner has performed any and all conditions precedent to filing the instant action and has exhausted any and all available administrative remedies to the extent possible and required by law. Petitioner and its members submitted numerous objections to the approvals for the Project and the City's reliance on a MND.

13. Respondents have taken final agency actions with respect to adopting the MND and granting approval of the Project. Respondents have a duty to comply with applicable state laws, including but not limited to CEQA, prior to undertaking the discretionary approvals at issue in this lawsuit. Petitioner possesses no effective remedy to challenge the approvals at issue in this action other than by means of this lawsuit.

14. On February 22, 2018, Petitioner complied with Public Resources Code Section 21167.5 by emailing and mailing to Respondents a letter stating that Petitioner planned to file a Petition for Writ of Mandate seeking to invalidate Respondents' approvals for the Industrial Park Project. Attached hereto as Exhibit A is the true and correct copy of this letter.

15. On February 23, 2018, Petitioner complied with Public Resources Code Section 21167.7 and Code of Civil Procedure Section 388 by furnishing the Attorney General of the State of California with a copy of the Petition. Attached hereto as Exhibit B is the true and correct copy of the letter transmitting the Petition to the Attorney General.

16. Pursuant to Public Resources Code Section 21167.6(b)(2), Petitioner elects to prepare the record of proceedings in this action. Concurrently with this Petition, Petitioner is filing a notice of election to prepare the administrative record.

17. Petitioner has no plain, speedy, or adequate remedy in the course of ordinary law unless this Court grants the requested writ of mandate to require Respondents to set aside their adoption of the MND and approvals for the Industrial Park Project. In the absence of such remedies, Respondents' approvals will remain in effect in violation of state law, and the environment, Petitioner, and residents and property owners of the City of Fresno and nearby communities will be irreparably harmed. No money damages or legal remedy could adequately compensate Petitioner and the residents and property owners of the City for that harm.

STATEMENT OF FACTS

Description of the Project Area and Project

18. The site for the proposed Industrial Park Project consists of over 110 acres of currently undeveloped open space on the edge of the City of Fresno. Portions of the project site are zoned for open space uses while others are zoned for heavy industrial uses.

19. The site is bordered by South Orange Avenue on the west, South Cedar Avenue on the east, East Central Avenue to the south, and the Orange Avenue Disposal Company to the North. Much of the surrounding land uses are currently devoted to open space, agriculture, or residential uses. Directly across Central Avenue from the Project site is a small neighborhood of single family homes located in unincorporated Fresno County. The closest home is less than 150 feet from the Project site.

20. The communities near the Project site are disproportionately comprised of lower income households and households with incomes below the federal poverty line and are exposed to disproportionate environmental burdens compared to the City and the County of Fresno as a whole. Neighborhoods and sensitive uses adjacent to and near the Project site include the homes along East Central Avenue between Orange and Cedar Avenues which face the Project site, the disadvantaged unincorporated community of Daleville, neighborhoods located on East Britten and East Malaga Avenues between Highways 41 and 99, the Flamingo Mobile Home Park, and Orange Center Elementary School. According to the California Department of Education, approximately 90.7% of the children who attend Orange Center Elementary School qualify for free or reduced price lunch under the National School Lunch Program based on their income and 42% of students are English Language Learners.

21. These areas are already subject to substantial air pollutant emissions from existing industrial uses in the area and freeway traffic. In fact, under the California Environmental Protection Agency's CalEnviroScreen ("CES") 3.0 methodology, which identifies communities that are disproportionately burdened by multiple sources of pollution, neighborhoods in South Fresno rank among the most burdened by multiple sources of pollution in the State of California. The census tract where the Project is located ranks in the 100th percentile under CES for pollution burden, the 97th percentile for PM 2.5 air pollution, and the 98th percentile for ozone and toxic releases compared to other census tracts in California. Many of the households located near the Project site have had one or multiple cancer incidences and cancer-related deaths that likely are due at least in part to pollutant exposure.

22. Additionally, the Project site is located in the Kings Sub-basin, which the

California Department of Water Resources has classified has a high priority basin because it is in critical overdraft. Most of the homes in the communities adjacent to and near the Project Site rely on private domestic wells to meet residents' needs for water for drinking, cooking, cleaning, and other household purposes. Since the drought that began in 2012, the wells at many of the homes in the area have run shallow or dry, forcing residents to spend thousands of dollars to drill deeper wells and to make emergency connections to neighbors with wells that continue to function.

23. On or about September 30, 2016, Real Parties in Interest applied for a development permit to build an "industrial business park" at the Project site. Although the City's permit review includes few details about the proposed Project, Development Permit Application No .D-16-109 discloses that the Industrial Park Project would construct seven massive concrete buildings, totaling more than 2,100,000 square feet in area. The Industrial Park Project alone would add 6,260 vehicle trips to the roads immediately surrounding the Project site and would operate twenty four hours a day, seven days per week.

24. In addition to the Industrial Park Project, the City recently approved two other large-scale warehouse projects in the Project's immediate vicinity. A new Ulta Beauty distribution center is being constructed at the junction of Orange & Central Avenue at the western boundary of the Project site. A new Amazon warehouse is being built less than .6 miles from the Project site. These two projects alone are constructing 1,525,000 square feet of new warehouse space and will generate new air quality, water, light, noise, traffic, and other environmental impacts in the immediate area of the Project site. Construction of the Amazon Warehouse has generated excessive amounts of dust that coats residents' homes and cars and triggers allergic and asthmatic responses and has resulted in increased truck traffic that passes in front of residents' homes throughout the day and night, resulting in ongoing noise and vibration impacts that can be heard and felt within residents' homes.

The City's Project Review and Approval

25. On or about September 18, 2017, City staff released an Environmental Assessment and Mitigated Negative Declaration for the Industrial Park Project. The City determined that the

MND was not fully within the scope of the Master Environmental Impact Report ("MEIR") prepared for the Fresno General Plan and adopted by the City Council in 2014, but the City still relied on portions of the MEIR and its mitigation measures to conclude that the Project would not create significant environmental impacts. The MND asserted that despite the Project's size and close proximity to residential communities, the Project would have no significant, unmitigated environmental impacts. The City provided notice of the availability of the Environmental Assessment only in the Fresno Bee and at the County Clerk's Office. Prior to its approval by the Development and Resource Management Director, the City provided no direct notice of the Environmental Assessment or of the Project itself to residents or owners of property in the communities surrounding the Project site or to Orange Center Elementary School.

26. Public comments submitted to the City highlighted numerous deficiencies in the MND. For instance, commenters noted that the MND failed to describe and analyze various construction-related impacts and the impacts of foreseeable uses of the Industrial Park Project, including uses that are allowed by right with no further environmental review under the City's Municipal Code. Public comment also noted that the MND failed to evaluate the Project's cumulative environmental impacts. Public comments also noted the City's failure to submit the Project to the City Council District 3 General Plan Implementation Committee for its consideration and recommendation as required by the Municipal Code. In addition, public comments requested that the Development Director exercise her authority under Fresno Municipal Code Section 15-204 to refer the permit application for this project to the Planning Commission for consideration and a public hearing.

27. On October 24, 2017, despite these and other concerns raised by the public, the City's Development and Resource Management Director approved the Industrial Park Project without a public hearing.

28. On November 8, 2017, Petitioner's members, along with multiple other groups concerned about the Project's potential impacts, filed an appeal to the City's Planning Commission pursuant to the Fresno Municipal Code. Petitioner submitted comments in support

of the appeal, which incorporated previous concerns raised about the MND's inadequacies and noted that City staff was recommending Project approval without complying with applicable requirements of the Fresno Municipal Code, the General Plan, or the Roosevelt Community Plan, all of which were designed to minimize the impacts of new development on nearby properties,

29. On December 20, 2017, the City of Fresno Planning Commission heard the appeal of the Project approval. Members of the public attended the meeting to express their concern over the City's inadequate review process and the Project's foreseeable impacts. Despite these comments, the Planning Commission voted to recommend that the City Council deny the appeal and adopt the MND.

30. On January 25, 2018, Respondent City Council heard the appeal with the Planning Commission's recommendation. Prior to the hearing, Petitioner submitted additional comments in support of the appeal. Those comments noted numerous deficiencies in the MND, including its failure to: (i) analyze or mitigate the Project's foreseeable air quality impacts even though the community surrounding the Project site already experiences one of the heaviest pollution burdens in the State, (ii) adequately analyze or mitigate the Project's groundwater impacts even though the King Sub-basin is in critical overdraft, (iii) include any analysis or appropriate mitigation relating to the disturbance of soils on a site adjacent to and with no physical separation from a landfill and another hazardous waste site; (iv) address concerns raised by responsible agencies regarding these issues and other inadequacies in the MND, and (v) the City's failure to comply with CEQA and its own Municipal Code in its approval of the MND and Development Permit.

31. At the City Council hearing on January 25, 2018, several members of South Central Neighbors United, South Central Neighbors United's attorney, and other members of the public spoke in support of the appeal, raising concerns with the MND, the lack of public notice about the Project prior to its approval, and the City's failure to comply with its Municipal Code. Despite the written and oral comments provided to the City Council, the City Council voted to adopt, without modification, the MND prepared for the Project, and it denied the appeal and

upheld the decision the issue a development permit for the Project.

FIRST CAUSE OF ACTION

Violation of CEQA

32. Petitioner realleges and incorporates by reference the preceding paragraphs in their entirety.

33. CEQA is designed to ensure that government agencies incorporate the goal of long-term protection of the environment into decisions that may affect the environment, consistent with the provision of a decent home and suitable living environment for every Californian. CEQA applies to any discretionary action taken by an agency that may cause a reasonably foreseeable change in the environment.

34. In furtherance of its goal of environmental protection, CEQA requires that an agency prepare an EIR for a project whenever substantial evidence in the record supports a fair argument that the project may have a significant impact on the environment. The EIR is the cornerstone of the CEQA process and discloses a project's potential adverse environmental and human impacts. The EIR also informs decisionmakers, responsible agencies, and the public of alternative mitigation measures, project elements, or project designs that would lessen or avoid the project's adverse environmental impacts.

35. CEQA also mandates that the lead agency adopt feasible and enforceable mitigation measures that would reduce or avoid any of a project's significant environmental impacts. If substantial evidence in the record supports a fair argument that any of the project's significant environmental impacts cannot be mitigated to a less than significant level, an agency may not rely on a Mitigated Negative Declaration and must instead prepare an EIR.

36. The City's approval of a development permit constitutes a discretionary act that triggers its obligation to comply with CEQA.

37. The City violated CEQA when it approved the Industrial Park Project by failing to adequately evaluate and mitigate its project impacts for the following non-exclusive list of reasons:

a. The MND fails to completely and adequately describe the Project and its

effects, including, but not limited to, failing to evaluate impacts from foreseeable uses of the Project site such as potential air quality and public health impacts, construction-related activities necessary to develop the Industrial Park Project and any related impacts. The MND also improperly segments project approvals and actions in its analysis, precluding a full understanding of the Project's significant impacts.

b. The MND fails to provide an adequate description of baseline conditions against which the City must measure the Project's impacts. For example, the air quality analysis fails to accurately disclose the current levels of harmful air pollutants near the Project site, even though the surrounding community is one of the most environmentally-burdened communities in the state.

c. The City improperly relied on the MEIR and CEQA Guidelines Section 15178 in the MND because the Project is not consistent with the MEIR's impact analysis. Even if the City could rely on the MEIR in part, the City failed to adopt mandatory mitigation measures set forth in the City's MEIR.

d. The MND fails to adequately analyze and mitigate the Project's air quality impacts. For example, the MND ignores comments from the San Joaquin Valley Air Pollution Control District indicating that the City failed to closely study potential criteria pollutants and toxic air contaminants and failed to evaluate how these pollutants will impact nearby sensitive receptors and general public health. The MND further fails to consider and mitigate odor impacts to nearby sensitive receptors. The MND improperly defers mitigation of potentially-significant air quality impacts.

e. The MND fails to adequately analyze and mitigate the Project's potential to expose individuals to Valley Fever.

f. The MND fails to adequately analyze and mitigate the Project's greenhouse gas emissions. For example, the MND made no attempt to quantify the Project's greenhouse gas emissions even though there is substantial evidence

that these emissions would be significant.

g. The MND fails to adequately analyze and mitigate the Project's water supply impacts. For example, the MND failed to provide any analysis of the water quantity that operations at the new Industrial Park Project will require. Petitioner is further informed and believe that no Water Supply Assessment was prepared for the Project, contrary to the requirements of California Water Code Section 10910. The MND also contained misleading information concerning the availability of water for the Project site by incorrectly claiming that there was a guarantee of water for the Project.

h. The MND fails to adequately analyze and mitigate the Project's aesthetic and light impacts. For example, the Project site is less than 150 feet away from the nearest residence, but the MND does not adequately address foreseeable nighttime light impacts to that or other nearby residences.

i. The MND fails to adequately analyze and mitigate the Project's impacts from disturbing contaminated soils. The Project site is located directly adjacent to, and without any physical boundary separating it from. a site designated by the Department of Toxic Substance Control and ("DTSC"). Two other DTSC sites are also located less than 1/3 of a mile away from the Project site. But the MND does not address the potential for Project construction and operation to create significant impacts by, for example, spreading contaminated dust and other hazardous materials to nearby homes and the Orange Elementary School.

j. The MND fails to adequately analyze and mitigate the noise and vibration impacts caused by construction and operation of the Project. Instead, the MND improperly defers analysis of these impacts to some uncertain future date. The Project's noise and vibration impacts are readily foreseeable given the sensitive receptors that live and go to school in the Project's immediate vicinity.

k. The MND fails to adequately analyze and mitigate the Project's traffic safety impacts. The Project will add over 6,000 new daily truck trips to the roads

surrounding the Project site. Those trucks will pass in front of homes and schools, often on narrow two-lane roads that lack shoulders or sidewalks. But the MND ignores whether this massive increase in traffic will cause safety hazards to cyclist and pedestrians, including residents and schoolchildren that walk along the roads.

l. The MND fails to adequately analyze whether the Project is inconsistent with applicable General Plan and Community Plan policies adopted for the purpose of avoiding or mitigating environmental impacts. The MND thereby fails to alert the public and decision-makers of the numerous inconsistencies of the Project with the General Plan and Roosevelt Community Plan and fails to effectively mitigate the impacts of the Project.

m. The MND fails to adequately analyze and mitigate any of the Project's cumulative impacts, including, but not limited to, aesthetic and light, air quality, greenhouse gas, noise, public health, public safety, and traffic impacts. Instead, it improperly relies on the MEIR's previous cumulative impact analysis even though that analysis did not consider the impacts from industrial development like the proposed Project.

38. Moreover, the City lacks substantial evidence to support its conclusion that identified mitigation measures will actually mitigate the Project's significant impacts. For example, the City fails to demonstrate how mitigation measures contained in the MEIR that the City relied on to approve the Project can adequately mitigate the Project's foreseeable air quality and groundwater impacts.

39. The City violated CEQA by failing to prepare an EIR for the Project when the record demonstrates that the Project may cause the potentially significant environmental impacts described above, among others, which have not been adequately disclosed, analyzed, or mitigated to a less than significant level.

40. Finally, the City failed to conduct a public scoping meeting prior to preparing the MND despite CEQA's clear requirements. California Code of Regulations, title 14, ("CEQA

Guidelines") Section 15082(c)(1) requires a public agency to hold at least one scoping meeting for projects of statewide, regional, or areawide significance. CEQA Guidelines Section 15206(b) states that a "proposed project is of statewide, regional, or areawide significance" if it is industrial in nature and encompasses more than 650,000 square feet of floor area. The Industrial Park Project plans to construct over 2,000,000 square feet of industrial floor area and consequently is a project of statewide, regional, or areawide significance. Despite this designation, the City never conducted the scoping meeting required by law.

41. For all of the above reasons, the City prejudicially abused its discretion and failed to comply with the law.

SECOND CAUSE OF ACTION

Inconsistency with Fresno General Plan

42. Petitioner realleges and incorporates by reference the preceding paragraphs in their entirety.

43. Government Code Section 65300 requires the legislative body of each city to adopt a general plan for the physical development within the city. The general plan is often called a "constitution" for future development to which all other land use decisions must conform. Accordingly, any decision of the City affecting land use and development, including approving development permits, must be consistent with the general plan. See *Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1182-86.

44. Fresno Municipal Code Section 15-5206 permits the City to approve a Development Permit only where it finds that an application is consistent with the "General Plan and any operative plan or policies that the City has adopted."

45. Despite this requirement. the Project as approved is inconsistent with numerous provisions of the General Plan. These inconsistencies include:

a. Failing to ensure that the Project provide a sustainable and stable water supply.

b. Failing to ensure that potable water production and supply are in place to serve the Project.

c. Failing to mitigate the Project's effect on the "long-range water budget" to ensure adequate supply for current and future users.

46. Respondents' conclusory findings of plan consistency, moreover, are inadequate as a matter of law and are not supported by substantial evidence. The findings consist of simple checkbox and do not demonstrate how the Project's largescale development will be consistent with the General Plan. Moreover, the City failed to articulate the connection between its findings and the evidence in the record in contravention of the California Supreme Court's decision in *Topanga Association for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506.

47. Because (1) Respondents did not proceed in the manner required by law, (2) their decision was arbitrary and capricious, and (3) their decision was not supported by substantial evidence, the City's approval of the Project should be set aside as set forth below.

THIRD CAUSE OF ACTION

Inconsistency with Roosevelt Community Plan

48. Petitioner realleges and incorporates by reference the preceding paragraphs in their entirety.

49. Development in the Project area is also covered by the Roosevelt Community Plan, which was adopted by Respondent City Council in 1992 and contains multiple mandatory requirements that govern the Project. For example, the Community Plan requires that "a specific finding be made by the City Public Utilities Director and Fire Chief to document that an adequate supply of clean potable water can be provided to serve the domestic and fire suppression needs of each proposed development prior to approval" of a project. This policy's express purpose is to ensure "continued provision of an adequate water supply to serve" the planning area.

50. Despite this clear and mandatory requirement, the City Public Utilities Director and Fire Chief made no finding that there was adequate water supply to serve the Project. In fact, the comments by the Fire Department state that each proposed building diagram was "not approved" by the Department. This example demonstrates that the City failed to abide by the Roosevelt Community Plan's clear mandates when it approved the Project, and as a result

violated Fresno Municipal Code Section 15-5206.

51. Respondents' conclusory findings of plan consistency, moreover, are inadequate as a matter of law and are not supported by substantial evidence. The findings consist of simple checkbox and do not demonstrate how the Project's largescale development will be consistent with the Community Plan. Moreover, the City failed to articulate the connection between its findings and the evidence in the record in contravention of the California Supreme Court's decision in *Topanga Association for a Scenic Community v. County of Los Angeles,* 11 Cal.3d 506 (1974).

52. Because (1) Respondents did not proceed in the manner required by law, (2) their decision was arbitrary and capricious, and (3) their decision was not supported by substantial evidence, the City's approval of the Project should be set aside as set forth below.

FOURTH CAUSE OF ACTION

Violations of City of Fresno Municipal Code

53. Petitioner realleges and incorporates by reference the preceding paragraphs in their entirety.

54. The City of Fresno Municipal Code contains mandatory regulations governing proposed developments like the Industrial Park Project that were adopted to ensure consistency of new development with the surrounding community and to reduce the potential for new development to impact existing land uses. As described below, the City repeatedly ignored these mandatory requirements of its Municipal Code when it approved the Project.

55. Fresno Municipal Code Section 15-4906(D)(1) provides that a General Plan District Implementation Committee "shall review and provide recommendations to the Planning Commission and City Council on every application for a . . . Development Permit . . . to develop property within the committee's boundaries." The Committee "shall consider every plan to which the development is subject." The Project falls within the boundaries of the District 3 Implementation Committee's boundaries, which represents the poorest areas of the City and areas of the City with greatest concentration of people of color and immigrant populations. Despite the clear requirements of its code, however, the City failed to present the Project to the

District 3 Implementation Committee prior to approving the Project.

56. The City failed to comply with Fresno Municipal Code Section 15-2512, which prohibits uses from operating "in a manner that emit dust, fumes, smoke, or particulate matter adverse to the public health, safety, or general welfare of the community or detrimental to surrounding properties or improvements . . . ." But the Project-specific air quality mitigation measures adopted by the City fail to require compliance with this code Section or otherwise prevent the emissions of dust, fumes, smoke and particulate matter from impacting the community and the surrounding properties.

57. The City failed to comply with Fresno Municipal Code Sections 15-2015 and 15-2508 which requires that Project lights "be placed to deflect light away from adjacent properties and public streets" and take other steps to prevent light and glare from impacting neighboring properties. The mitigation measures adopted to address light and glare impacts do not ensure compliance with these mandatory obligations because they only require implementation if "excessive lighting spillover onto adjacent properties" occurs. Thus, the City's approval documents fail to contain any information showing that the Project will comply with the Municipal Code's requirements to prevent light and glare impacts to nearby properties.

58. The City failed to comply with Fresno Municipal Code Section 15-1304(G) which requires that the Project's "[s]ervice and loading areas should be integrated with the design of the building and shall be screened from residential areas. Special attention shall be given when designing loading facilities in a location that is proximate to residential uses." But the City's approval documents fail to contain any information showing that the Project will comply with this requirement.

59. The City failed to comply with Fresno Municipal Code Section 15-5204(b) which requires that a "Development Permit application be accompanied by a written narrative, operational statement, site plans, elevations, three-dimensional renderings, and other related materials necessary to show that the proposed development, alteration, or use of the site complies with all applicable provisions of this Code." The application materials failed to comply with this requirement and the Development Permit should not have been approved.

60. For all of the above reasons, the City abused its discretion and failed to comply with the law in approving the Development Permit for the Industrial Park Project.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays for judgment as follows:

1. For alternative and peremptory writs of mandate directing Respondents to vacate and set aside their approval of the Project;

2. For alternative and peremptory writs of mandate directing Respondents to vacate and set aside the MND for the Project;

3. For alternative and peremptory writs of mandate directing the Respondents to comply with the requirements of CEQA and take any other action required by Public Resources Code Section 21168.9, comply with the requirements of the City of Fresno General Plan and the Roosevelt Community Plan, and to comply with the City of Fresno Municipal Code;

4. For a temporary stay, temporary restraining order, and preliminary and permanent injunctions restraining Respondents and Real Parties in Interest and their representative agents, servants, and employees, and all others acting in concert with Respondents or Real Parties in Interest on their behalf, from taking any action to implement the Project pending full compliance with the requirements of CEQA, the City of Fresno General Plan and the Roosevelt Community Plan, and the City of Fresno Municipal Code;

5. For costs of the suit;

6. For Petitioner's attorneys' fees under Code of Civil Procedure Section 1021.5 and other applicable authority; and

7. For such other and further relief as the Court deems just and proper.

DATED: February 23, 2018

SHUTE, MIHALY & WEINBERGER LLP

By: _____
ELLISON FOLK
Attorneys for Petitioner
SOUTH CENTRAL NEIGHBORS UNITED

VERIFICATION

I, Daniel Macias, am a member of South Central Neighbors United, petitioner in this action. I have read the foregoing Petition for Writ of Mandate. I am familiar with the contents of the Petition. All facts alleged in the above Petition, not otherwise supported by exhibits or other documents, are true of my own knowledge, except as to matters stated on information and belief, and as to those matters I believe them to be true. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed at Fresno, California on February 21, 2018.



973895.1

EXHIBIT A

SHUTE, MIHALY
& WEINBERGER LLP

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ELLISON FOLK
Attorney
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February 22, 2018

Via E-Mail and U.S. Mail

Ms. Yvonne Spence
City Clerk
City of Fresno
2600 Fresno Street, Room 2133
Fresno, California 93721

Re: Notice of Commencement of CEQA Litigation Challenging Approval of Development Permit D-16-109

Dear Ms. Spence:

This letter is to notify you that South Central Neighbors United will file suit against the City of Fresno ("City") and its City Council for failure to observe the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq., the CEQA Guidelines, California Code of Regulations section 15000 et seq., state law, the City's General Plan, the Roosevelt Community Plan, and the City's Municipal Code when the City approved Development Permit D-16-109 and adopted a Mitigated Negative Declaration for that permit. This notice is given pursuant to Public Resources Code section 21167.5.

Please note that, pursuant to Public Resources Code section 21167.6, the record of proceedings for City's actions includes, among other items, all "internal agency communications, including staff notes and memoranda related to the project or to compliance with [CEQA]," Because all e-mails and other internal communications related to the Project are part of the administrative record for the lawsuit to be filed by South Central Neighbors United, the City may not destroy or delete such documents prior to preparation of the record in this case.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Ellison Folk

973309.1

PROOF OF SERVICE

South Central Neighbors United v. City of Fresno et al.

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the City and County of San Francisco, State of California. My business address is 396 Hayes Street, San Francisco, California 94102.

On February 22, 2018, I served true copies of the following document(s) described as:

NOTICE OF INTENT TO SUE

on the parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the address(es) listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Shute, Mihaly & Weinberger LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address Larkin@smwlaw.com to the person(s) at the e-mail address(es) listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 22, 2018, at San Francisco, California.

Patricia Larkin

SERVICE LIST

South Central Neighbors United v. City of Fresno et al.

Ms. Yvonne Spence
City Clerk
City of Fresno
2600 Fresno Street, Room 2133
Fresno, California 93721
Telephone: (559) 621-7650
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EXHIBIT B

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February 23, 2018

Via U.S. Mail

Attorney General Xavier Becerra
Office of the Attorney General
1300 "I" Street
Sacramento, California 95814

Re: Notice of Filing CEQA Litigation: South Central Neighbors United v. City of Fresno et al.

Dear Attorney General Becerra:

Enclosed please find a copy of the Petition for Writ of Mandate and Complaint for Injunctive Relief ("Petition") in the above-captioned action. The Petition is provided to you in compliance with Public Resources Code section 21167.7 and Code of Civil Procedure section 388. Please acknowledge receipt in the enclosed prepaid, self-addressed envelope. Thank you.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Ellison Folk

Encl.

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Title

The climate gap: environmental health and equity implications of climate change and mitigation policies in California-a review of the literature

Permalink

https://escholarship.org/uc/item/4815h61w

Journal

CLIMATIC CHANGE, 109(S1)

ISSN

0165-0009

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Publication Date

2011-12-01

DOI

10.1007/s10584-011-0310-7

Peer reviewed

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Climatic Change (2011) 109 (Suppl 1):S485–S503
DOI 10.1007/s10584-011-0310-7

The climate gap: environmental health and equity implications of climate change and mitigation policies in California—a review of the literature

Seth B. Shonkoff · Rachel Morello-Frosch · Manuel Pastor · James Sadd

Received: 12 February 2010 / Accepted: 26 September 2011 / Published online: 24 November 2011
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Abstract Climate change is an issue of great importance for human rights, public health, and socioeconomic equity because of its diverse consequences overall as well as its disproportionate impact on vulnerable and socially marginalized populations. Vulnerability to climate change is determined by a community's ability to anticipate, cope with, resist, and recover from the impact of major weather events. Climate change will affect industrial and agricultural sectors, as well as transportation, health, and energy infrastructure. These shifts will have significant health and economic consequences for diverse communities throughout California. Without proactive policies to address these equity concerns, climate change will likely reinforce and amplify current as well as future socioeconomic disparities, leaving low-income, minority, and politically marginalized groups with fewer economic opportunities and more environmental and health burdens. This review explores the disproportionate impacts of climate change on vulnerable groups in California and investigates the costs and benefits of the climate change mitigation strategies specified for implementation in the California Global Warming Solutions Act of 2006 (AB 32). Lastly, knowledge gaps, future research priorities, and policy implications are identified.

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1 Introduction—the climate gap: environmental health and economic equity

The *Climate Gap* refers to the disproportionate and unequal implications that climate change and climate change mitigation hold for people of color and the poor (Pastor et al. 2010b; Morello-Frosch et al. 2009; Shonkoff et al. 2009b). Vulnerability to climate change is determined by the ability of a community or household to anticipate, cope with, resist, and recover from the direct and indirect impacts of extreme weather events and geophysical shifts such as sea level rise (Pacific Institute 2009), hurricanes (Greenough and Kirsch 2005), floods (Greenough et al. 2001), heat waves (Knowlton et al. 2009), air pollution (O'Neill et al. 2008), and infectious diseases (Gage et al. 2009). Therefore, to understand concerns regarding the climate gap, it is critical to explore disparities in the costs and benefits of climate change, the abilities of different groups to adapt to it, and the equity dimensions of the mitigation strategies imposed to attenuate it in order to better inform policy and regulatory action.

This review focuses on the current and projected disparate impacts of climate change and climate change mitigation policies on groups of lower socioeconomic status (SES)[1] in California. We begin with a review of the disproportionate health and economic impacts of climate change itself and examine differences in the capacity of certain groups to adapt to its direct and indirect effects, such as extreme weather events, increased or re-located air pollution, infrastructure impacts, and major economic shifts. Second, we review a subset of the health and economic equity implications of different climate change mitigation strategies, with an emphasis on those included in The Global Warming Solutions Act of 2006 (AB 32) in California. We end with a discussion of the implications of this wide-ranging body of literature for future policy-relevant research on the climate gap.

2 Environmental health inequities and climate change

Globally, climate change and climate change mitigation strategies hold a variety of implications for differential environmental health outcomes across socio-demographic strata. In the California context, the primary climate change exposures that pose risks for population health are increases in the incidence and duration of extreme weather events, such as heat waves and the exacerbation and changing patterns of outdoor air pollution. We thus focus our review of health implications of climate change in California on these two factors.

2.1 Extreme weather events—heat

Extreme weather events, such as heat-waves and floods are expected to increase in frequency and intensity over the next hundred years (Solomon et al. 2007). This could amplify the risk of associated morbidity and mortality for populations that are not able to adapt to, or protect themselves against, such events.

Regarding heat wave mortality, in a study of nine California counties from May through September of 1999–2003, Basu and colleagues (2008) found that for each 10°F (5.6°C)

[1] The term *socioeconomic status* or *socioeconomic position* (used synonymously) will refer to the position of an individual or group along the spectrum of access to the resources necessary to maintain their health and economic livelihoods. Socioeconomic status thus encompasses variables such as income level, inherited wealth, educational status, beneficial social networks, and race/ethnicity.

increase in ambient temperature, there is a 2.6% (95% confidence interval [CI]: 1.3, 3.9) increase in cardiovascular mortality with ischemic heart disease being the most dominant of these outcomes (Basu et al. 2008). In this analysis mortality risks were highest for African Americans at 4.9% (95% CI: 2.0, 7.9) (Basu and Ostro 2008).

In terms of heat-wave morbidity, a study on the 2006 California heat wave (July 15–August 1, 2006) estimated an excess of 16,166 emergency department visits and 1,182 excess hospitalizations statewide, compared with a temporally-proximate summer referent period (July 8–14 to August 12–22, 2006) (Knowlton et al. 2009). Emergency department visits for heat-related causes (i.e., acute renal failure, diabetes, cardiovascular diseases, electrolyte imbalance, and nephritis) increased across the state (relative risk [RR] 6.30; 95% CI 5.67–7.01), especially in the Central Coast, which includes San Francisco. Elevated rate ratios of emergency department visits of 1.05 (95% CI: 1.04–1.07) and 1.03 (95% CI: 1.02–1.04) were found for children (0–4 years of age) and the elderly (≥65 years of age) respectively (Knowlton et al. 2009).

2.2 Intrinsic and extrinsic risk factors for heat-associated mortality and morbidity

Although heat exposure alone is implicated in increased morbidity and mortality, physiological, social and economic factors are also fundamental to understanding the uneven distribution of these adverse heat-specific health outcomes across diverse populations (Klinenberg 2002). Thus, risk factors for heat-associated mortality and morbidity can be categorized as intrinsic (i.e., age, disability, medical status) or extrinsic (e.g., housing, access to cooling centers, transportation) and low SES groups are disparately affected by both of these risk categories.

In terms of intrinsic factors, people suffering from chronic medical conditions have an elevated risk of death during heat waves (Kilbourne 1997; Kovats and Hajat 2008) compared with those who are healthy. In fact, a study on heat specific mortality during the 2003 heat wave in France reported that over 70% of the victims found at home had pre-existing medical conditions, particularly cardiovascular and/or psychological illnesses (Poumadere et al. 2005). Because low SES groups are disproportionately affected by medical conditions partially due to their lack of access to technological, informational, and social resources to cope with these conditions (Phelan et al. 2004), they tend to be most adversely affected by extreme heat events.

In terms of extrinsic risk factors, low-income urban communities and communities of color are particularly vulnerable to increased frequency of heat waves and higher temperatures because they are often segregated in the inner city (Schulz et al. 2002; Williams and Collins 2001), which is more likely to experience “heat-island” effects (Harlan et al. 2008). Heat-island effects occur in urban areas when lighter-colored (higher albedo) materials such as grass, trees, and soil are replaced by darker-colored (lower albedo) materials such as roads, buildings, and other surfaces, leading to increased absorption of sunlight. This increased absorption of sunlight decreases the dissipation of heat, thus warming the local area (Oke 1973). A recent land cover analysis (Shonkoff et al. 2009a) shows a positive relationship between the proportion of impervious land cover in neighborhoods and an increasing proportion of residents living in poverty, as well as a negative relationship between the amount of tree canopy coverage and the proportion of residents living in poverty in four California urban areas (Fig. 1). Further, there is a positive relationship between the proportion of neighborhood residents of color and the proportion of impervious land cover and a negative relationship between the proportion of people of color and the amount of tree cover (Fig. 2). These data suggest a

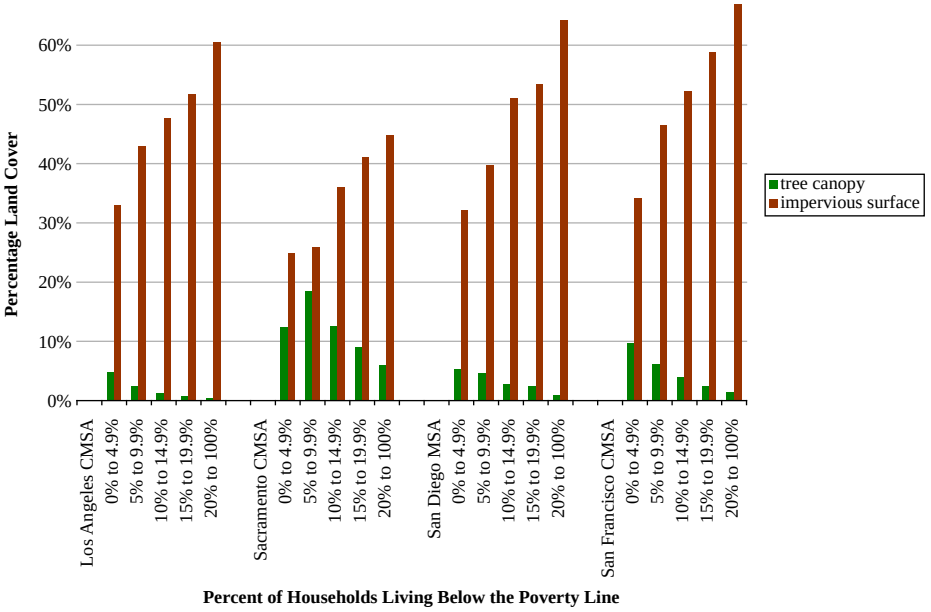

Fig. 1 Land cover characteristics across comparable neighborhood poverty groups. Cited From: Shonkoff et al. (2009a, b)

disproportionate exposure to heat-island risk factors on communities of color and low income.

From home building materials to devices used to heat and cool living environments, technologies are employed by all communities to protect themselves from exposure to weather and climate fluctuations. In terms of technological adaptation as an extrinsic factor in heat-associated health outcomes, studies have documented that lack of access to air conditioning is correlated with risks of heat-related morbidity and mortality among urban elderly of low SES in the United States (Kovats and Hajat 2008; Semenza et al. 1996; Knowlton et al. 2009). In the Los Angeles-Long Beach Metropolitan Area, for example, a higher proportion of African-Americans do not have access to home air conditioning compared to the general population (59% vs. 40%, respectively). Similar trends hold for Latinos (55%) and communities living below the poverty line (52%) (USCB 2004) (Table 1). Although these data do not fully explain the drivers of observed racial and SES disparities in air conditioner ownership, the differential proportions of ownership of these technologies is important because some households may rely on air conditioning during extreme heat events and days when communities are instructed to stay indoors and avoid outdoor pollution exposures.

Further, nearly 84% of residents in the Los Angeles metropolitan area rely on cars to commute to work compared to 7% of residents who rely on public transportation (ACS 2007). The paucity of public transit options makes residents extremely reliant on car ownership to meet basic transportation needs.[2] During extreme heat events, households

[2] Since the 1930s when National City Lines, a holding company run by corporate partners in the automotive industry, bought and dismantled a considerable portion of the public transit infrastructure in Los Angeles, residents without a personal automobile in the Los Angeles-Long Beach Metropolitan Area have been at a severe disadvantage (Kunzli et al. 2003).

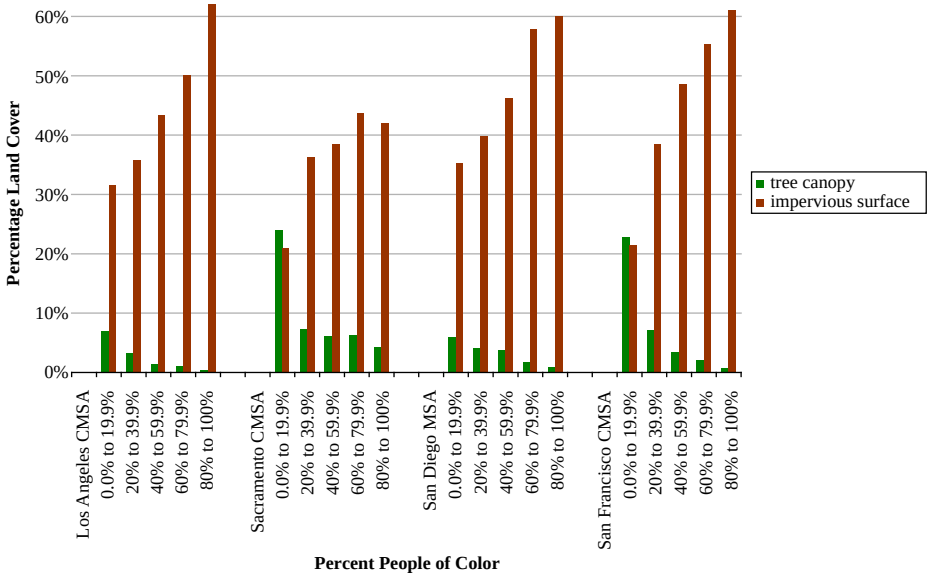

Fig. 2 Land cover characteristics across comparable neighborhood racial/ethnic minority groups. Cited From: Shonkoff et al. (2009)

without air conditioning may need to relocate to cooler areas and government-sponsored cooling stations, which can be a logistical challenge for those without access to a car or adequate public transportation. In the Los Angeles-Long Beach Metropolitan Area, elevated proportions of African-American (20%), Latino (17.1%), and Asian (9.8%) households do not have access to a car, compared to white households (7.9%) (USCB 2004).

Using heat-wave data from Chicago, Detroit, Minneapolis, and Pittsburgh, O'Neill et al. (2005) found that African Americans had a 5.3% higher prevalence of heat-related mortality than Whites and 64% of this disparity is potentially attributable to disparities in prevalence of central air conditioner technologies (O'Neill et al. 2005). These results are bolstered by other studies that found associations between being African American and lack of air conditioning as an indicator for vulnerability to heat-related poor health outcomes (Curriero et al. 2002; Greenberg et al. 1983; O'Neill et al. 2003; Rogot et al. 1992; Semenza et al. 1996; Whitman et al. 1997). It should be noted that this same analysis found that both Asian and Hispanic groups suffer a lower mortality burden than that of white groups in Los Angeles.

Material and socioeconomic deprivation, especially in the inner city, is highly correlated with heat-wave and heat-stroke mortality risk in the United States, including California (English et al. 2007; Kovats and Hajat 2008; Klinenberg 2002). For example, the heat wave in Phoenix, Arizona, in 2006 was responsible for 13 heat-stroke-related deaths, 11 of which were homeless people who tend to lack access to material and social resources (Kovats and Hajat 2008).

This is in line with other findings that African American Los Angeles residents have a projected heat-wave-mortality rate that is nearly twice that of the Los Angeles average under different GHG emission scenarios (Fig. 3) (Cordova et al. 2006).

Because SES is fundamentally associated with occupation, it is important to note that California's agricultural and construction workers experience severe heat-related morbidity and mortality with data pointing towards possible increasing trends in recent years (English et al. 2007; MMWR 2008). Mexican and Central American immigrants who come to

Table 1 Proportion of households without access to any air conditioning by race and SES—Los Angeles-Long Beach Metropolitan Area, California (2003)

	Total number of households (General Los Angeles population)	Total occupied units (General Los Angeles population)	Black (not Hispanic)	Hispanic	Elderly (65 years or older)	Below poverty level
All Occupied units	3,131,000	39.7%	58.5%	54.6%	37.5%	51.5%
Renters	1,608,900	48.1%	59.1%	58.4%	38.7%	56.3%
Homeowners	1,522,100	30.9%	57.4%	48.9%	36.8%	38.8%

Percentages are likely an underestimate of the true value due to the fact that more than one category may apply to a single unit in the dataset

Adapted from: American Housing Survey for the Los Angeles-Long Beach Metropolitan Area 2004 (USCB 2004)

California to work in the agricultural and construction sectors are particularly vulnerable because of the cumulative impacts of their long workdays under strenuous conditions, low capacity to protect themselves on the job and assert labor rights, and exposure to chemicals such as pesticides. Between the years 2003–2006, 71% of the crop-workers that died due to heat-associated complications were identified as Mexican, Central or South American and 72% of these deaths were in adults aged 20–54 years, a population typically considered at low-risk for heat illnesses (MMWR 2008). As heat-wave incidence and intensity increases, disparities will persist among those with high levels of material and social deprivation that characterize the context within which low-SES groups live and work.

2.3 Air pollution

The literature on outdoor (ambient) air pollution in California has primarily focused on tropospheric ozone (O_3), nitrogen oxides (NOx), and chemically undifferentiated particulate matter (PM). Hence, we focus our review on these three pollutants. It is nonetheless

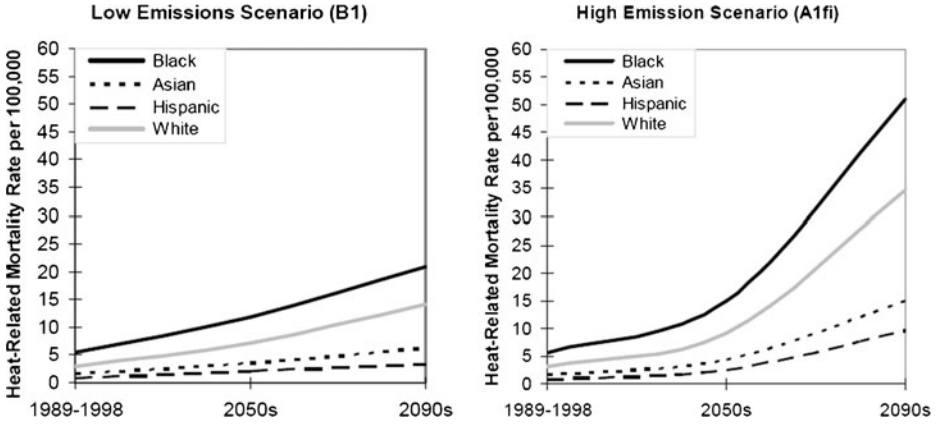

Fig. 3 Relative heat-wave mortality rates by race/ethnicity for Los Angeles. Actual historical values (1989–1998) and projected future values (2050s and 2090s) for high-emissions (A1fi) and low-emissions (B1) scenarios. (HadCM3 projections only). Cited from: Cordova et al. (2006)

important to mention that other greenhouse gas (GHG) co-pollutants such as sulfur dioxide (SO_x), black carbon (BC) (Smith et al. 2009) and carbon monoxide (Kaur and Nieuwenhuijsen 2009) are associated with: population health disease burdens as well as additional climate forcing.

Five of the ten most ozone-polluted metropolitan areas in the United States are in California (Los Angeles, Bakersfield, Visalia, Fresno, and Sacramento) (ALA 2011). Because of this, Californians suffer a relatively high air pollution associated disease burden, including 18,000 (95% CI: 5,600–32,000) premature deaths each year and tens of thousands of other illnesses (CARB 2008a). Primarily due to the combustion of fossil fuel among mobile sources and the stationary energy sectors, California's levels of NO_x, PM, O_3, and a myriad of other health damaging air pollutants are very high, particularly in California's Central Valley and South Coast Region where ambient levels frequently exceed National Ambient Air Quality Standards (US EPA 2010). As mentioned above, these sectors not only emit criteria air pollutants but also climate altering pollutants (i.e., CO_2, NO_x, BC, O_3) that contribute to additional climate forcing on local, regional and global scales (Smith et al. 2009). In turn, elevated temperatures interact with NO_x and sunlight and lead to increases in ambient O_3 concentrations in urban and suburban areas. This contributes to both respiratory health effects (Jerrett et al. 2009) as well as even more climate forcing (Meleux et al. 2007; Stathopoulou et al. 2008; Smith et al. 2009).

In California, the five smoggiest cities are also the locations with the highest projections of climate change induced ambient ozone increases as well as the highest densities of people of color and low-income residents (Cordova et al. 2006). A recent study projects a dose–response relationship in which for each 1 degree Celsius (1°C) rise in temperature in the United States, there is an estimated 1,000 (CI: 350–1800) excess air-pollution-associated deaths (Jacobson 2008). About 40% of the additional deaths may be due to the exacerbation of ozone production due to increased temperatures and the rest to particulate matter—which increases due to CO_2-enhanced stability, humidity, and biogenic particle mass—annually (Jacobson 2008).

3 Disproportionate economic impacts of climate change on low SES groups

On scales from the global to the local, climate change holds direct and indirect implications for the strength of economic systems as well as the distribution of their impacts and benefits. This section reviews how climate change could have negative implications for the economic prospects of lower SES groups in California compared with their higher SES counterparts. We focus our equity analysis on three issues: 1) Increased prices of basic necessities such as water, food, and household energy; 2) Downturns in productivity and employability in the agricultural sector; and 3) Increased infrastructure damage from extreme weather events, sea level rise, and wildfires.

3.1 Price of basic necessities

Under a business-as-usual scenario it is estimated that between the years 2025 and 2100, the cost of providing water to the western United States will increase from $200 billion to $950 billion per year, representing an estimated 0.93–1% of the United States' gross domestic product (GDP) (Ackerman and Stanton 2008). Under the same scenario annual U.S. energy expenditures (excluding transportation) could be $141 billion higher in 2100 than they would be if today's climate conditions continued throughout the century

(Ackerman and Stanton 2008). This increase is approximately equal to 0.14% of US GDP, an economically significant figure (Ackerman and Stanton 2008). Four climate change impacts—hurricane damage, energy costs, real estate losses, and water costs—alone are projected to cost 1.8% of the GDP of the United States, or, just under $1.9 trillion (2008 U.S. dollars [USD]) by the year 2100 (Ackerman and Stanton 2008).

Low-income groups spend the highest proportion of their income on basic necessities such as water, household energy (electricity), and food (BLS 2002) and price increases due to these climatic shifts may lead to increases in necessity prices. There is nearly a three-fold difference in the proportion of the sum of expenses allocated to water between the lowest- and the highest-expenditure quintiles of the US population. Households in the lowest economic quintile use more than twice the proportion of their total expenditures on electricity than do those households in the highest economic quintile. Similarly, food, the commodity that represents the largest portion of total spending out of all the basic necessities in the expenditure quintiles, shows a two-fold discrepancy between the lowest and the highest economic quintiles (Fig. 4) (BLS 2002).

3.2 Disproportionate impact of climate change on agricultural employment in California

The majority of jobs in sectors that will likely be significantly affected by climate change in California, such as agriculture are held by low-income people of color (EDD 2004; USCB 2005). In the event of climatic shifts that impact the productivity or location of agriculture, these workers would be the first to lose their jobs. The literature suggests that climate change will affect employment within the agricultural sector in two main ways: (1) Increases in the frequency and the intensity of extreme weather events will expose agriculture to greater productivity risks and possible revenue losses that could lead to abrupt layoffs (Costello et al. 2009; Howitt et al. 2009); and (2) Changing weather and precipitation patterns could require expensive adaptation measures such as the relocation of crop cultivation, the modification of the composition or type of crops (Jackson et al. 2009), and the increase in agricultural inputs, such as pesticides, to adapt to changes in ecological composition.

Latinos comprise 77% of the U.S. agricultural workforce and the majority of these men and women are also categorized as low-income (EDD 2004). In California, as of 2003, agriculture provided approximately 500,000 jobs with 315,000 of them being held by Latinos (EDD 2004). The majority of these jobs are seasonal, pay very low wages, and do not provide health insurance or job security. Because of the low wages and the seasonality of the work, agricultural counties are among the poorest in the state. As climate change affects agricultural

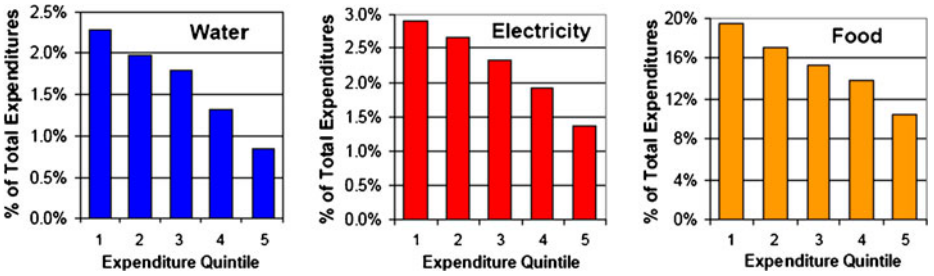

Fig. 4 Household expenditures on water, electricity, and food by income group (as percentage of total expenditures). Expenditure quintile is a proxy for income with quintile 1 representing the lowest-income households and quintile 5 representing the highest-income households. Adapted From: BLS 2002; Cited from: Cordova et al. (2006)

productivity in California, agricultural laborers could be increasingly affected by job losses. For example, the two highest-value agricultural products in the $30 billion California agriculture sector are dairy products (milk and cream, valued at $3.8 billion annually) and grapes ($3.2 billion annually) (CASS 2002). Climate change is expected to decrease dairy production by as much as 7–10% under the IPCC B1 scenario and 11–22% under the A1fi scenario by the end of the century (Pittock et al. 2001). It is also expected to adversely impact the ripening of wine grapes, substantially reducing their market value (Hayhoe et al. 2004). These data suggest that communities in the Central Valley and other crop growing areas, where agriculture is most concentrated and low-income Latino communities are most common, would be the hardest hit by these climate change impacts.

3.3 Infrastructure, SES, and insurance access

As extreme weather events such as sea level rise, wildfires, and storms become more frequent and severe, California's infrastructure will be increasingly threatened and damaged. The literature suggests that the capacity of households and communities to prepare for and adapt to these risks is a function of their income, access to infrastructure insurance and other SES-related factors. For example, sea level rise, due to climate change is expected to put the California coast at increased risk of property damage (Pacific Institute 2009). An analysis by the Pacific Institute (2009) indicates that there is likely to be disproportionate impacts on low-income households in 13 of the 20 counties that lie along the California coast because of disparities in abilities to purchase emergency preparedness materials, buy insurance policies, and obtain needed building reinforcements.

Increased risk of property and financial damage from wildfires are also correlated with socioeconomic position. For example, Ojerio and colleagues (2010) found that in Arizona, low income households are less likely to have control over ignitability of their property, are more likely to be located in districts with less wildfire suppression capability, and have less access to federal government resources to mitigate wildfire risks than their more wealthy community counterparts.

Although the issue of insurance is a large question and a detailed analysis is beyond the scope of this review, the literature indicates that those in low socioeconomic positions are consistently underinsured (Blaikie et al. 1994; Fothergill and Peek 2004). Households that have home or renters' insurance can, relatively rapidly, recuperate and resume living much in the same way as prior to the disaster. In contrast, low-income households—who are often under-insured—may spend the rest of their lives struggling to recover from property damage related to an extreme weather event (Blaikie et al. 1994; Fothergill and Peek 2004; Thomalla et al. 2006). As the frequency and intensity of extreme weather events increase, the price of disaster insurance will also likely increase. This could make disaster insurance even more prohibitively expensive for low-income people thus decreasing the ability of this group to cope with infrastructure and property losses. Swiss Re (2006) indicates that insurance losses have been on an upward trend since 1985. During the years 1987–2004 property insurance losses due to natural disasters averaged USD 23 billion per year and in 2005, losses rose to USD 83 billion, of which USD 60 billion was due to hurricanes (Katrina, Rita, and Wilma) alone (Swiss Re 2006). Increases in the price of disaster insurance will add insult to injury to those who are already disproportionately affected by these events.

Lastly, disproportionate impacts of extreme weather events on low SES households have the potential to exacerbate homelessness, especially in urban areas. This would be largely due to the lack of access to insurance and emergency credit, lower amounts of savings, fewer personal resources, and the accumulated suffering from previous economic stresses of

low-income groups (Bolin and Bolton 1986; Fothergill and Peek 2004; Tierney 1988). It is also possible that increased government spending on infrastructure protection could hold deleterious consequences for low-income communities due to a diversion of funds away from educational and social programs, public transportation projects, population health initiatives, and other services (CRAG 2002).

4 Implications of climate change policies for low-SES groups

Because low SES groups are disproportionately affected by climate change, they could significantly benefit from sound climate change policies that are sensitive to demographic distribution of economic and health vulnerabilities. This section examines the equity dimensions embedded in the most prominent climate change mitigation strategies included in California's climate change law to be implemented by the California Air Resources Board (CARB) (AB 32) (CARB 2008b). We discuss two overarching themes: (1) The economic implications of different climate change policies on low-SES households; and (2) Positive and negative human health implications of different mitigation strategies for low-SES communities and households.

4.1 Economic costs and benefits of different climate change mitigation strategies

A major concern with regard to policies to reduce emissions is that they will be regressive; the burden of costs that arise from mitigation will fall disproportionately on lower-income households (Hassett et al. 2008; Walls and Hanson 1996). For example, the Congressional Budget Office projects that a United States-wide cap-and-trade scenario aimed to cut carbon dioxide emissions by 15% could cost 3.3% of the average income of households in the lowest income quintile as opposed to only 1.7% of the average income of households in the top income quintile (CBO 2007).

Substantial equity issues are raised by how pollution credits are allocated to facilities as well as—in the case of policies that include fees on emissions or the auctioning of emission credits—how revenues generated from these programs are redistributed to society and individual consumers. Under cap-and-auction or fee-based strategies, the sale of emission credits to polluters could generate sizable revenues that could help to offset the potentially regressive qualities of the emission cap program (Hepburn et al. 2006). These funds could be distributed to the public through tax cuts, tax-shifting, investments in clean energy, education, or through direct periodic dividends to consumers (CBO 2007), assuaging the regressive impacts that could accrue if the prices of necessities increase. Other investments generated from cap-and-auction or fee-based revenues could include investments in public transportation that could both reduce the emissions of greenhouse pollutants while simultaneously adding the co-benefit of reductions in emissions of health damaging co-pollutants due to lowering the numbers of mobile sources on the road. These types of programs should, however, be geographically targeted to reduce the pollution from the most air pollution-impacted areas—the majority of which are found in areas with low SES populations and people of color (Morello-Frosch and Jesdale 2006).

4.2 Health concerns of cap-and-trade policies

While cap-and-trade, under certain circumstances, is efficient at reducing GHGs and their associated co-pollutants on a regional basis, the strategy makes no guarantee

about the reduction of these emissions from any one source (O'Neill 2004). Hence, low-SES communities geographically situated in highly polluted areas are concerned about the persistence and potential exacerbation of co-pollutant hotspots at the local community level. The bundles of measures that CARB has already begun to implement to reduce GHG emissions could also contribute to notable reductions in co-pollutants such as SO_x, PM, ozone, and other health damaging contaminants and toxic air pollutant precursors (CARB 2008b). These measures could hold the most notable benefits for low-income groups and people of color who are disproportionately segregated in neighborhoods in close proximity to highways, ports, and other sections of transportation and goods-movement corridors where air quality has been noted as poor (CARB 2006b, 2008c; Morello-Frosch and Jesdale 2006; Morello-Frosch and Lopez 2006).

Cap-and-auction (assuming that fewer than 100% of permits are auctioned) reduces, and fees eliminate the need for emissions trading in comparison to free-allocation programs because industry is likely to buy only what it needs (Hepburn et al. 2006). Auctioning credits also decreases financial incentives to keep old polluting facilities open by eliminating the grandfathering in of old facilities. It also decreases the problem of over-allocation and excessive banking and trading of emission credits. An over-allocation of credits paired with excessive emission credit banking and trading could possibly lead firms to not reduce local GHG emissions. This could lead to the under-achievement of significant co-pollutant benefits in communities that are currently highly impacted by multiple pollution sources (Ellerman and Buchner 2007).

An example of such an emission reduction underachievement is the Regional Clean Air Incentives Market (RECLAIM), an emission trading system employed to lower NO_x emissions in Southern California. Data suggests that this program may have increased NO_x emissions in Wilmington, California, while region-wide emission levels declined (Lejano and Hirose 2005). Further, under Rule 1610, licensed car scrappers could purchase old, polluting vehicles and destroy them, and in return receive emission credits through the South Coast Air Quality Monitoring District (SCAQMD) that could be sold to oil refineries (Drury et al. 1999). The majority of the emission credits were purchased by four oil companies: Unocal, Chevron, Ultramar, and GATX to avoid the cost of installing pollution-reduction technologies that would capture volatile organic compound (VOC) gases forced out of oil tankers into the air when being loaded. These refineries are all located in close proximity to one another in the City of Wilmington and San Pedro except for the Chevron facility located in El Sugundo (Drury et al. 1999). In their analysis, Drury et al. (1999) indicate that this mobile-to-stationary trading program led to a situation where workers and local community residents were unnecessarily exposed to benzene, a known human carcinogen, and other VOCs that were contained in the emissions. These emissions could have been remediated by pollution reduction technologies that were already in widespread use in similar operations along the West Coast.

4.2.1 Co-benefits of AB 32 measures

As mentioned, GHG reduction measures under AB 32 are predicted to greatly reduce health damaging co-pollutant emissions (Bailey et al. 2008). For example, NO_x emissions, a precursor of ozone formation and a group of health damaging pollutants in their own right, are expected to be reduced by 86,000 t by 2020, more than three-quarters of which will be achieved through regulatory requirements for cleaner cars and trucks (Bailey et al. 2008).

Under AB 32, projected PM and NO_x reductions together are estimated to prevent approximately 400 premature deaths, 11,000 fewer cases of asthma-related and other lower

respiratory symptoms, 910 fewer cases of acute bronchitis, and 67,000 fewer work days lost in California (CARB 2008b). These health benefits are projected to be valued at $1.4 billion to $2.3 billion in 2020 alone (Bailey et al. 2008). A review by CARB (2008a) indicates that there is a 10% (CI: 3% to 20%) increase in the number of premature deaths per 10 $\mu g/m^3$ increase in $PM_{2.5}$ exposure (CARB 2008a). CARB (2008a) also estimates that diesel PM contributes to 3,500 (CI: 1,000–6,400) premature deaths statewide on an annual basis. These projections could be an underestimate of the actual health and economic impacts of diesel PM because many emission reduction measures and public health benefits such as reduced cancer risks have not been accounted for in their calculation (Bailey et al. 2008). Some known carcinogens, that were not included in these analyses, such as benzene, formaldehyde, and toluene may be reduced by the implementation of GHG reduction measures because they are predominantly produced, directly and indirectly, by mobile sources and by the refinement and combustion of fossil fuels (EPA 2005). From an environmental equity perspective, the reduction of air toxics may be important as several studies indicate that communities of color and the poor bear a disproportionate burden of health risks associated with air toxics exposures (CARB 2008b, c; Morello-Frosch and Jesdale 2006; Morello-Frosch and Lopez 2006; Morello-Frosch et al. 2002).

4.2.2 Co-benefits of AB 32 early action and other mitigation measures

AB 32 also includes Early Action Measures (EAMs) (CARB 2008b) that regulate the inputs and functions of landfills, types of motor vehicle fuels, varieties of refrigerants in cars, types of port operations, and many other processes that are involved in emissions of climate altering pollutants. It is estimated that if all EAMs are adopted, 52,000 tons of NOx and PM pollution would be removed from the air. This would avert approximately 250 additional premature deaths, thousands of cases of asthma and other lower respiratory symptoms, and could save an estimated $1.1 to $1.8 billion in health costs in 2020 alone (Bailey et al. 2008). Table 2 shows the CARB analysis of the health co-benefits of these actions. These measures could benefit low-SES groups that tend to be segregated in neighborhoods that may be host to significant industrial and transportation emission sources.

4.2.3 Fuel switching

The Low Carbon Fuel Standard (LCFS) was adopted as an EAM under AB 32 (CARB 2008b). The goal of the LCFS is to reduce lifecycle GHG emissions from transportation by at least 10% (CARB 2008b). One of the primary foci of this EAM is to transition from mobile source reliance on pure gasoline to partial or pure biofuels such as ethanol (CARB 2008b). However, some studies suggest that biofuel refineries could negatively impact the health of adjacent communities by exposing them to chemical as well as microbial byproducts of the distillation processes necessary for fuel production (Madsen 2006).

Widespread use of biofuels may also hold implications for outdoor air pollution concentrations. For instance, Jacobson (2007) predicts that E85 (85% ethanol, 15% gasoline) may increase ozone-related mortality, hospitalization, and asthma by 9% in Los Angeles and 4% nationwide if used to power vehicles. In fact, E85 may prove to have as much or more of a public health impact than the use of 100% gasoline (Jacobson 2007). This suggests that low-income and minority communities that live closest to highways and goods transport corridors could bear disproportionate health burdens if these fuels prove to be more toxic than gasoline.

Table 2 Estimates of statewide air quality-related health benefits in 2020 Cited from: (CARB 2008b)

Health endpoint	Health benefits of existing measures and 2007 SIP mean	Health benefits of recommendation in the proposed scoping plan mean
Avoided premature death	3,700	400
Avoided hospital admissions for respiratory causes	770	84
Avoided hospital admissions for cardiovascular causes	1,400	150
Avoided asthma and lower respiratory symptoms	110,000	11,000
Avoided acute bronchitis	8,700	910
Avoided work loss days	620,000	67,000
Avoided minor restricted activity days	3,600,000	380,000

Lastly, it should be noted that growing crops for use as fuel will likely raise prices of food crops (Tenenbaum 2008). This could prove to be regressive, damaging socioeconomic prospects of low-income consumers and low-income agricultural laborers who are most vulnerable to job loss and hunger (Tenenbaum 2008).

5 Future research needs and implications for policy development

Research on climate equity ranging from health effect estimates to economic impacts remains a nascent field with substantial knowledge deficits. Empirical and theoretical approaches in the fields of climate science, industrial ecology, epidemiology, environmental health, sociology, economics, geographic information system (GIS) spatial analysis, and statistics are key to understanding and predicting the socioeconomic, cultural, and health implications of complex ecological, meteorological, and air pollution phenomena. Moreover, these diverse analyses will also be integral to the determination of which policies and mitigation practices could most effectively narrow the climate gap.

5.1 Expanding climate gap research: climate change

Research that sheds light on the state of the climate gap, as it pertains to climate change directly is in high demand. Substantial arguments ensue over the scale at which measurements of localized impacts and co-pollutants should be evaluated in order to meet the intent and requirements of AB 32. In order to design effective policies and to monitor the efficacy of those policies in regards to localized impacts, future research should: (1) explore how to characterize, quantify, and maximize co-benefits of pollution reductions in existing or new “toxic hotspots”; (2) determine the geographic scale at which these evaluations should take place given the data available; and (3) identify the data necessary to improve future evaluations.

More research is needed to investigate the rates and impacts of climate change events that are projected to occur specifically in California. The identification of possible adaptation strategies that could be used to evade morbidity and mortality burdens from climate change impacts specifically in California is also important foci for future analyses.

Although much research has been done to characterize the geographic and demographic characteristics that increase the risk of heat-associated health impacts

of communities (Knowlton et al. 2009), fewer studies have shed light on how to best deliver targeted messages about extreme heat exposure. As the literature suggests, heat-related mortality and morbidity is borne disproportionately by groups of older residents, children, and those of low SES (Basu and Ostro 2008; English et al. 2007; Knowlton et al. 2009). Strategies to prevent heat-related illness should include messages targeted toward parents and caregivers of young children, the elderly and, most importantly, to socially isolated populations.

Differential exposures to the health-damaging impacts of climate change, such as excessive heat, extreme weather events, and increases in air pollution could be examined from a geo-equity perspective by using GIS maps overlaid with vulnerability models and current socioeconomic, racial/ethnicity, and cultural group distributions in California. Interaction between these data layers should be taken into account when developing climate change policies so as to reduce the likelihood that future policies would create or amplify disproportionate burdens on vulnerable populations.

5.2 Expanding climate gap research: climate mitigation policies

Important foci for climate change mitigation strategy development are: (1) To conduct multi-level policy scenario comparisons to evaluate combinations of regulations and mechanisms that produce the most efficient, effective, and equitable outcomes with the most health and economic co-benefits on the local level (Shonkoff et al. 2009b); (2) To investigate the ways that impacted communities could play a role in climate change mitigation policy and regulatory deliberations; (3) To develop tools to measure the socioeconomic, environmental, and population health benefits and impacts of an expanded green economy; (4) To identify which climate altering pollutant source sectors will, most cost-effectively, be able to reduce pollution with the least amount of socioeconomic disruption and health impact; (5) To develop robust methods to characterize and quantify the co-benefits of health damaging pollution reductions in new or pre-existing air pollution hotspots.

Under cap-and-trade policies, it is essential to develop analytical tools to track where carbon credits are traded in order to assess the subsequent burden of co-pollutant emissions that may increase or decrease on local and regional levels. Building on these analyses, climate gap research should characterize patterns of human population exposure that results from local sources of pollution in a variety of settings, especially in population dense urban areas.

Health and economic risks of fuel switching and fuel innovations (i.e., ethanol) as specified in the LCFS should be characterized and presented in policy-relevant formats. For example, epidemiologic studies should better assess the effects of exposure to new fuels and their externalities during combustion (Jacobson 2007) as well as during production and distillation—for which there are no studies available. More research must also focus on the dangers of food shortages and food price increases associated with the production of ethanol and other biofuels (Tenenbaum 2008).

5.3 Cumulative impacts screening to guide decision-making

AB 32 requires that, prior to implementation, there be consideration and prevention of cumulative or additional impacts on already disproportionately impacted communities (CARB 2006a). However, no established method for identifying these communities currently exists. Researchers continue to develop environmental justice or cumulative impact screening methods that employ GIS-based mapping to consider risks from criteria

and toxic air pollutants, proximity to sources of pollution, and socioeconomic factors (Sadd et al. 2011). Such tools could be useful to evaluate community-level cumulative impacts from climate change itself as well as the implications of mitigation policies. Research to expand upon this work could develop a screening method that provides consistent monitoring and evaluation across air districts and cities to insure that all communities are assessed using similar metrics (Pastor et al. 2010a; Su et al. 2009). Such screening tools could be valuable for the evaluation of permitting, land-use change, and growth pattern decisions that are made at multiple scales; such data can also assist decision-makers to more accurately assess the local implications of regional planning strategies that address climate change.

6 Conclusions

Climate change is not only an environmental issue; it also has human rights, public health, and social equity dimensions. This review indicates that climate change is likely to disproportionally impact the health and economic stability of Californian communities that are least likely to cope with, resist, and recover from the impacts of climate change. This review also finds that low-income and minority communities could be disparately affected by the economic shocks associated with climate change both in price increases for basic necessities (i.e., water, energy, and food) and by threats of job loss due to economic and climatic shifts that affect important industries in California such as agriculture. Without proactive climate change mitigation policies that are sensitive to their economically regressive potential and their distribution of benefits, these strategies could potentially reinforce and amplify current as well as future socioeconomic and racial disparities in California. The consistency of racial and SES disparities as they relate to climate change has made these issues of mounting concern to regulators, policy-makers, researchers, and environmental justice advocates.

As California moves closer to a full implementation of AB 32, it will become a national and international leader in the development of aggressive strategies to reduce greenhouse gas emissions. Ensuring that climate equity is part of the equation will be critical to this implementation process. Research on climate equity—ranging from health effects to economic impacts—remains in its infancy. Interdisciplinary approaches are key to understanding the drivers of the climate gap and to specify which policies and mitigation practices would best address equity concerns. To proactively attenuate disproportionate environmental health burdens borne by the poor and people of color, agency officials and policy makers should ensure that vulnerable communities play a significant role in the development of future solutions to climate change. Non-technical knowledge, such as local expertise, community experience, and other contextual information is important to supplement technical knowledge as policy formation is underway (Minkler and Wallerstein 2003). In other words, researchers who hope to generate climate change-impact information that is sensitive to community-specific concerns should employ community-engaged approaches in their study designs (Minkler and Wallerstein 2003; Corburn 2005, 2009).

Although this paper is a comprehensive review of the environmental health and equity implications of climate change and climate change mitigation policies in California, limitations in the data exist. More extensive research on the mechanisms that underlie associations between inequities and climate change as well as mitigation policies should be undertaken as other competing risk factors that could confound relationships between race, SES, and climate change impacts may exist.

Acknowledgments Work for this project was supported by: the California Air Resources Board, the California Environmental Protection Agency, the Annenberg Foundation, the Energy Foundation, and the Hewlett Foundation.

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Climate Change, Public Health, and Policy: A California Case Study

Chandrakala Ganesh, PhD, and Jason A. Smith, MTS, JD

Anthropogenic activity will bring immediate changes and disruptions to the global climate with accompanying health implications. Although policymakers and public health advocates are beginning to acknowledge the health implications of climate change, current policy approaches are lagging behind.

We proposed that 4 key policy principles are critical to successful policymaking in this arena: mainstreaming, linking mitigation and adaptation policy, applying population perspectives, and coordination. We explored California's progress in addressing the public health challenges of climate change in the San Joaquin Valley as an example.

We discussed issues of mental health and climate change, and used the San Joaquin Valley of California as an example to explore policy approaches to health issues and climate change. The California experience is instructive for other jurisdictions. (*Am J Public Health*. 2018;108:S114–S119. doi: 10.2105/AJPH.2017.304047)

See also Perker-Flynn, p. S58.

Climate change is currently affecting the health of populations and is projected to do so far into the future.[1] With the current chaotic policy environment in the United States, gains made in policy addressing climate change may be reversed or halted at the federal level. Without continued progress on these issues, it will likely become more difficult in the future to address the potential serious health implications of climate change. In this environment, it may be critical for states to lead when the federal government lags behind. The policy literature recommends several principles[1] that public health policymakers can use to address this important issue. We believe that 4 of these are the most important: mainstreaming, a linked approach, a population perspective, and coordination (Table 1).[3–6] Our choice of these 4 principles is further supported by the work of Gould and Rudolph, whose analysis of individual-level and structural barriers to greater public health engagement in climate change and public health indicated that these principles were supported by perceptions in the field.[7] Our goal was to explore the health impacts of climate change and examine how California has implemented public health policy, based on these 4 principles. We performed a policy scan to identify associations between health and climate change, relied on published research, and used publically accessible state data for our analysis. We discuss public health policy and climate change in California, using mental health as an example. Our goal is to highlight larger policy issues and interrelationships among climate change, public policy, and the public, and how these 4 principles might be instructive to law and policy for other jurisdictions.

CLIMATE CHANGE AND THE SAN JOAQUIN VALLEY

To review policy "on the ground," we narrowed our analysis to the San Joaquin Valley in central California. We chose to examine the San Joaquin region because of its significant climate disruptions and its concentration of vulnerable populations. We sought to study the resulting public health implications and to understand how California policy addressed health issues and climate change at the local level. The San Joaquin Valley is often called "the nation's salad bowl" because of its fertile soil and the variety of produce grown in the region. It is a significant part of California's agricultural industry, which generated $47 billion in 2015. The San Joaquin Valley has 8 counties—Kings, Fresno, Kern, Merced, and Stanislaus counties, and parts of Madera, San Luis Obispo, and Tulare counties—and had a population of 3.9 million according to the 2010 census. The socioeconomic conditions in the San Joaquin Valley are strikingly different compared with the rest of California and the rest of the nation; Hispanics made up 48.5% of the population, one fifth of the households in the region had incomes below the poverty level, approximately 30% of the population did not have a high school diploma, and most of the communities were linguistically isolated because 84% of the population had limited English proficiency.[8]

California became dramatically hotter in the last several years, with temperatures in 2014 more than 3°F higher compared with the historical data from 1949 to 2005. In the San Joaquin Valley, a persistent decline in both precipitation and run-off led to drought conditions, with 2012 to 2014 being the hottest and driest years recorded.[9,10]

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This article was accepted July 19, 2017.

doi: 10.2105/AJPH.2017.304047

TABLE 1—Key Principles That Public Health Policymakers Can Use to Address Health Implications of Climate Change

Key Principle	Definition	Example of Application of the Principle in SJV
Mainstreaming	The principle that climate change is integrated into all planning and policy processes across jurisdictions and sectors.	Include the effects of climate change when making policy and funding decisions regarding mental health services.
Linked approach	A principle that emphasizes the importance of considering adaptation and mitigation policies as part of one climate change policy rather than as separate domains.	Take into account that increasing affordable housing in an area may reduce GHG emissions but may worsen exposure to PM2.5 and other pollution exacerbating health conditions.
Population perspective	A principle that examines the health status and condition of populations as populations, not merely the aggregation of individuals, "an individual's risk of disease cannot be isolated from the disease risks of the population to which s/he belongs."[2(p75)] The principle is foundational to the field of public health.	Resiliency-based programming for mental health and increasing access to mental health services are important but will not address the larger determinants of poor health.
Coordination	The principle that any successful policy to address the health effects of climate change must be coordinated. Overcoming policy silos, jurisdictional issues and other coordination problems is likely the most daunting task for public health law and policy.	Institutions that direct financing and policy for mental health services should coordinate with state mitigation and adaptation agencies.

Note. GHG = greenhouse gas; PM2.5 = particulate matter ≤ 2.5 μm in diameter; SJV = San Joaquin Valley, California.

Although previous studies dismissed any link between anthropogenic climate change and the California drought,[11] recent studies concluded that anthropogenic activity accounted for up to 30% of the drought conditions from 2012 to 2014.[12] These conditions led farmers in California to dig 1800 feet down to tap into ground water. Increased pumping of groundwater led to land subsidence, with parts of the San Joaquin Valley sinking by as much as 28 feet. Land subsidence is known to stress water systems, which leads to permanent failures in wells.[13] In March 2017, Tulare County's Office of Emergency Services reported 1612 cumulative domestic well failures in Tulare County alone.[14] The air quality in San Joaquin Valley is one of the nation's worst and has repeatedly failed to meet federal standards for fine atmospheric particulate matter 2.5 micrometers in diameter or smaller (PM2.5) pollution. The PM2.5 pollution arises from farming practices (e.g., tilling, burning crop harvesting, and so on), dairy operations, animal feed, and off-road vehicles. Climate change may further affect exposures to PM2.5 by affecting weather patterns and anthropogenic emissions.[15]

We found that the health-related effects of climate change were particularly striking in the San Joaquin Valley. Compared with the state average of 11 per 100 000 of the population, the rates of heat-related emergency room visits from 2005 to 2010 were considerably higher in the San Joaquin Valley, ranging from 17 to 28 per 100 000 of the population. Because the main occupation in the region is agriculture, the rise in heat-related hospitalizations could be the result of the physical strain combined with continuous exposure to the heat outdoors, which could lead to fatigue and respiratory illnesses. A strong correlation was observed between exposure to particulate matter (PM2.5) and negative health outcomes, such as cardiovascular illnesses and exacerbation of asthma symptoms. A combination of heat waves, dust storms, and changing weather patterns also led to a 6-fold increase in Valley Fever (a disease caused by a fungus that is found in the soil) in California between 2000 and 2011, with more than 75% of the cases reported in the San Joaquin Valley.[16]

In addition to physical health implications, climate change can have grave consequences for the mental health of affected populations. In the United States, the mental health consequences among populations affected by extreme weather events, especially Hurricanes Katrina, Sandy, and Ike were well documented.[1] Most individuals affected by acute weather events experience trauma, shock, stress, grief, and distress symptoms, which ameliorate once safer conditions are restored. However, for many individuals, the experience leads to major clinical and anxiety disorders, substance abuse disorders, posttraumatic stress disorders, and suicidal ideation.[1] Persistent drought has financial implications for individuals who rely on rainfall for their economic survival, which places an increased burden on their mental health.[1] Individuals who live in drought-affected areas experience psychological distress and ongoing worry about future drought conditions that might affect their livelihood. Long-term stress further affects their physical health, strains social relationships, and creates a cycle of despair. Psychological distress contributed to suicides among farm workers in countries (e.g., Australia and India) that experienced prolonged drought.[17,18] Drought was also a major contributor to the increase in suicides among male farm workers in the Midwestern United States in the 1980s.[19] Similarly, exposure to extreme heat was correlated with an increase in hospital and emergency room admissions, aggressive behaviors among those with mental illnesses, and death among those who experienced psychosis and dementia.[20,21] Another profound impact of climate change is solastalgia, which is a sense of desolation and loss of identity that an individual experiences as their familiar home environment changes, becomes uninhabitable, or hampers their livelihood.[22] Loss of identity because of climate change is often associated with occupations such as farming and fishing, which are place-based.[23] Finally, the impacts of climate change are unequal. Many populations such as indigenous communities, low-income groups,

women, children, older adults, individuals with disabilities, and those living in high-risk areas are more vulnerable to the mental health impacts of climate change.[24] Although the health burdens caused by climate change are significant, persistent, and intractable, the impacts of mental health consequences are particularly concerning and are the focus of our discussion.

We used published data to examine the mental health burden in the San Joaquin region and reviewed climate change policies for their inclusion of mental health. We also examined the current mental health burden in the region. According to the California Health Care Foundation, more than 16% of adults have a mental health need, and 5% have a serious mental illness in California.[25] San Joaquin Valley had some of the highest rates of mental illness in California, with 8% of adults with serious mental illness and 5.3% of children with serious emotional disturbances. The burden of mental illness and the unmet need became even more significant, when we examined the mental health workforce in the Valley. The numbers of all licensed mental health professionals in the San Joaquin Valley were well below the state average.[25] A community health needs assessment conducted by Kaiser found that in select San Joaquin Valley counties (i.e., Fresno, Kings, Madera, and Tulare), access to health care services was the main concern among residents. Other prominent issues included lack of transportation, difficulty in scheduling appointments and navigating the system, language barriers, and paying for copayments and medications. More than 80% of the population in these counties lived in a health professional shortage area for primary care.[26] The high rates of mental illness, low access to providers, and the likely impacts of drought and climate change on mental health made this a serious climate-related health issue. We consider California's approach to addressing this issue in this article.

CALIFORNIA'S APPROACH TO CLIMATE CHANGE

There are 2 goals in addressing climate change: mitigation and adaptation. Mitigation seeks to reduce greenhouse gases (GHGs). Policy approaches here include cap-and-trade systems, carbon sequestration, changes to energy generation systems, and transportation policy. Adaptation seeks to respond to the inevitable changes resulting from climate disruption. Many of these policies provide opportunities or "co-benefits" to improve the health of communities.

Mitigation Policy

California has taken aggressive steps to reduce GHGs and has been singled out as a leader in climate change policy. The Global Warming Solutions Act of 2006 is the center of California's mitigation policy. It originally required California to reach 1990 levels of GHG emissions by 2020 and was recently updated to require a reduction in GHGs to 40% below 1990 levels by 2030.[27] This policy also requires the state to evaluate mitigation efforts in terms of public health. Currently, California uses a cap-and-trade system to reduce GHGs and to achieve its reduction goals. This system generates funds that the state uses on projects that reduce GHG emissions. In 2012, the legislature passed SB 535, which requires that, in addition to reducing GHG emissions, 25% of the monies from the GHG fund must be spent to benefit disadvantaged communities (DACs). Specifically, 10% of these funds must be spent on projects located within DACs.[27]

The California Environmental Protection Agency (CalEPA) created a tool, CalEnviroScreen, to identify these DACs for purposes of GHG mitigation by measuring pollution burden and population characteristics by census tracts.[28] We used CalEnviroScreen 2.0 to study the San Joaquin Valley and found that 38.4% of census tracts in the San Joaquin Valley had a CalEnviroScreen score in the highest 15% (i.e., 85%–100%). With such a high percentage of DACs, the San Joaquin Valley communities experienced a unique combination of environmental pressures and inequities.

Adaptation Policy

California's first step toward preparing for the impacts of climate change—its adaptation policy—was the result of a 2008 Executive Order that required state agencies to develop a strategy to identify and prepare for climate impacts.[29] Since then, California has continued to update its Climate Adaptation Strategy.[30] Although these policies are not as well developed as California policies that target mitigation, the Climate Adaptation Strategy has now moved to include more structural elements in adaptation goals, and the state's adaptation policy has continued to expand, to rely on regular assessment of the issue through the California Climate Change Assessments.[31] In terms of public health explicitly, county public health departments have been working with the California Department of Public Health to identify public health risks in their communities, by building awareness and documenting climate change efforts in communities.[32]

EVALUATING CALIFORNIA'S HEALTH POLICY

We propose 4 key principles to evaluate health policies focusing on climate change: mainstreaming, linked approach, population perspective, and coordination. The California example shows us how these principles have been incorporated, where they have fallen short, and the ensuing implications.

Mainstreaming

Mainstreaming is "a process whereby adaptation measures are integrated 'into some aspect of related government policy such as water management, disaster preparedness and emergency planning or land-use planning.' Mainstreaming is not, therefore, a specific policy proposal, like a carbon tax, but rather a policy for policy proposals."[5(p25)] With mainstreaming, the effects of climate change are integrated into public health policy and planning. California has taken steps to integrate climate change adaptation and resiliency into its requirements for the general planning process of communities.[33] The Governor's office has also required the integration of climate adaptation planning into state policy, which also mandates the California Natural Resources Agency to develop a state adaptation plan. That adaptation plan, Safeguarding California, focuses on community resilience and response capacity to health

threats, indicator development, and improved coordination.[34] The recommendations provided in these adaptation plans are in broad strokes and lack the granular detail available in other climate change policies, and may not be sufficient to address more serious health problems in California.

We noted that a mix of public sources fund mental health services in California when we reviewed California policy with regard to our issue of mental health in the San Joaquin Valley. California counties, through their public health systems, have significant responsibilities related to the provision of mental health services. Services are paid for through a combination of federal, state, and local funds that combine revenue from Medi-Cal, sales taxes, vehicle fees, property taxes, and other miscellaneous funding.[35] Low-income uninsured adults who have no other source of care receive care from a medical indigent program run by counties known as County Medical Services Program (CMSP). Although some counties have expanded their CMSP offerings, many others have considerably cut back on coverage and services provided because of financial constraints. County funding decisions for mental health are currently independent of statewide policy priorities.[35] We believe that if climate change adaptation planning were part of policymaking in this area, additional mental health resources might be made available to residents of the San Joaquin Valley counties, thus providing cobenefits. States and counties could include the effects of climate change when planning and then provide additional resources for areas particularly affected by climate disruptions. Counties participating in the CMSP have already embarked on several innovative approaches to manage care for the neediest patients (e.g., contracting with local health plans, changing program benefits, providing more preventative care rather than episodic care, using technology for application screening, and so on). Even if the structure of mental health funding makes this mainstreaming difficult initially, simply moving the issue into the mainstream of mental health policy would help to identify structural policy barriers that were previously unknown. The narrow focus of public health funding and the mandate of programs could contribute to the difficulty of mainstreaming climate change in policy discussions. Addressing the larger political, policy, and legal constraints to public health would be key here.[7]

Linked Approach

A linked approach that views adaptation and mitigation as parts of the same climate policy is required, as one can influence the other, and each can have serious implications for health.[4,5] For example, mitigation policy might promote smart growth solutions that emphasize public transit and dense urban development as a tool to reduce GHG emissions. An unintended consequence of this policy might be the development of urban heat islands that are detrimental to human health.[5] In this example, a linked approach would include the possible exacerbation of heat islands in the adaptation planning process itself.

Mitigation and adaptation policies need better linkage in California. California took strides in explicitly and expressly linking mitigation policies to environmental justice policy goals when it enacted the California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund (SB 535), which required investments on GHG mitigation specifically in communities that experienced poor outcomes related to environment. California spent approximately $320 million for GHG mitigation projects in the San Joaquin counties (excluding the funding for the California high-speed rail project), with only $58 million of the total amount targeting or benefiting DACs. By comparison, the state spent approximately $2.2 billion dollars across California.[36] Although these SB 535 investments targeted DACs in California, they did not necessarily target investments that would reduce the health burden related to climate change in this area. For example, a number of projects in the San Joaquin counties related to affordable housing, vehicle replacement, irrigation improvements, and carbon sequestration received SB 535 investment funding under the California system of GHG mitigation. Although these projects succeeded in bringing resources to DACs, these mitigation strategies might have exacerbated or failed to address climate-related health issues in the short term. For example, SB 535 investments included additional affordable housing in Fresno,[37] although the San Joaquin counties had some of the highest PM2.5 concentrations in California. As stated earlier, exposure to PM2.5 is associated with poor health outcomes. The legislature acknowledged this issue in a series of reforms passed in August 2016 that sought to improve oversight of the Air Resource Board and improve data on individual pollution sites.[38] Even with this attempt at reform, there is no expressed link between mitigation cobenefits strategy for SB 535 and adaptation policy in California. This tenuous link could have serious health consequences in the short- and long-term, as we found in the San Joaquin region, where none of the currently funded projects addressed mental health issues. Although more work is needed here, SB 535 and the California approach demonstrated that it is possible to link mitigation policy to other policies, including adaptation. We also noted that an emphasis on the health co-benefits of climate change policy might facilitate improved linkages and engagement with the public health sector.[7] Linking adaptation and mitigation, along with coordination, might be the 2 most difficult challenges facing any community or state that seeks to address the health effects of climate change.

Population Perspective

The California approach using CalEnviroScreen is an example of how societies might apply the population perspective to public health and health policy around climate change. By relying on a strong evidence base and indicators supported by research, CalEnviroScreen provides a fair tool for making comparative evaluations at the census level. It provides a useful way to compare and contrast populations in California and can allow policymakers to visualize health inequities, structural and social determinants of health, and other population-level health issues. Health policy planners could explore use of CalEnviroScreen data for mainstreaming issues related to climate change in California into public health and health policy planning, and direct funding to areas where the

public health impact of climate change would be substantial. For example, policymakers in California could overlay the prevalence of mental illnesses, the current distribution of mental health resources, and the CalEnviroScreen Scores in the San Joaquin Valley to address the impact of climate change in this area and develop policies and investments to target affected communities. SB 535–related investments demonstrated how funding could be linked to clear policy goals. Inclusion of additional measures of health indicators in the CalEnviroScreen tool might help to identify vulnerable populations that might be particularly sensitive to the disruptions associated with climate change. However, CalEnviroScreen scores are calculated using parameters that rely heavily on pollution measures, and therefore, might not capture other climate change vulnerabilities. CalEPA continues to modify the tool and has recently included new indicators (e.g., cardiovascular disease and rent-adjusted income) to the CalEnviroScreen tool. This approach, although not perfect, is particularly effective and may help to facilitate the political process in addressing climate change. In addition to CalEnviroScreen, the CalEPA has other tools that focus on environmental justice[39]; other states and jurisdictions have developed similar tools.[40] The use of the population perspective would facilitate the analysis of health policy problems. Inclusion of scores from tools such as CalEnviroScreen would provide a transparent and open system to guide policy decisions in this arena.

Coordination

Finally, any approach should focus on coordination. *The Lancet* Commission made this point most clearly:

> [governments should] adopt mechanisms to facilitate collaboration between Ministries of Health and other government departments, empowering health professionals and ensuring that health and climate considerations are thoroughly integrated in government-wide strategies. A siloed approach to protecting human health from climate change will not work.[41(p1862)]

Legal scholars suggested multiple approaches to achieving this coordination and noted the difficulties in designing a legal regimen that could manage the complex issues associated with this topic.[6] California addressed this coordination issue in several ways. Three are worth noting: participation in subnational agreements; the Integrated Climate Adaptation and Resiliency Program (ICARP) at the Office of Planning and Research to coordinate among levels of government; and the Climate Action Team to coordinate within the state government. California worked with other jurisdictions on a subnational level to coordinate efforts around climate change. These included the Western Climate Initiative, which is made of up of several Western states and Canadian provinces and agreements with subnational counterparts in China.[42] ICARP was created in 2015 to provide a framework for coordinating among state, regional, and local governments. The framework also created a Technical Advisory Council to assist planning efforts. At the state government level, California relies on a Climate Action Team composed of state agency secretaries and the heads of various boards and departments. This team is led by the Secretary of CalEPA. Each of these approaches are important steps in coordinating responses to climate change and might be the most important and challenging aspect of public health policy and its approach to climate change.

The actual approaches to coordination are less important than understanding the role of politics and political will in responding to initiatives linked to climate change. A key factor contributing to the creation of these systems has been strong grassroots and community support, coupled with strong leadership in state government. Public health advocates and practitioners must be more tightly integrated into these coordination initiatives. They must lead the efforts to coordinate health responses within our complex and uncoordinated health care systems. Without a formal mechanism to coordinate the various funding sources and state policy objectives, we see a mismatch between health burden and health resources. Although policies in California emphasize the importance of coordination and are taking great strides, this issue has not moved into the policy fore in the way SB 535 moved environmental justice concerns into the realm of mitigation policy. This coordination of policy efforts may be the most difficult legal and policy challenge facing the public health sector as it seeks to address the health impacts of climate change.

CONCLUSIONS

The California approach demonstrated how to link resources to outcomes in a way that emphasized accountability and to connect mitigation and adaptation concerns. However, the experiences of the San Joaquin Valley region suggested a need for greater coordination of resources. Importantly, we believe California might have benefited from linking adaptation and mitigation policy from the beginning. Legal theorists also suggested that an approach that addresses both mitigation and adaptation as part of one regulatory policy might be useful.[5] California's experience suggests that, to be effective, coordination must be incentivized, there must be political will, and the issues might need to be mandated. Finally, we believe that there are opportunities to link climate change and public health policy. For jurisdictions that rely on tools such as CalEnviroScreen to link climate change and health, policymakers must understand fully the inclusion and exclusion of population and environmental indicators and their implications for health equity. Focusing on the health implications of climate change and the health cobenefits of mitigation strategies might benefit the health of populations, as well as address the ongoing and future impacts of climate change. California's successes, challenges, and willingness to update policy in this area are all instructive for communities working to prepare for the health effects of climate change and to mitigate its causes. AJPH

CONTRIBUTORS

C. Ganesh and J. A. Smith contributed equally to the origin, writing, and revision of this article.

HUMAN PARTICIPANT PROTECTION

No protocol approval was necessary for this study because no human participants were involved.

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October 8, 2014

Via E-mail

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2115 Kern Street, Suite 320
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Re: Draft Master Environmental Impact Report For The Draft General Plan and Development Code Update For The City Of Fresno (SCH # 2012111015)

Dear Ms. Werner:

As requested, Shute Mihaly & Weinberger LLP has completed a review of the draft master environmental impact report ("DMEIR") for the City of Fresno General Plan and Development Code Update ("General Plan" or "Project"). We focused our review on the DMEIR's analyses of traffic, air quality, public health, greenhouse gases and noise impacts. Our review of the DMEIR reveals serious violations of the California Environmental Quality Act ("CEQA") (Public Resources Code section 21000 *et seq.*) and CEQA Guidelines (California Code of Regulations, title 14 section 15000 *et seq.*).

The DMEIR is fundamentally inconsistent with CEQA. The DMEIR fails to disclose, analyze, and propose mitigation for significant environmental impacts related to land use, traffic, air quality, public health, and climate change among others. What analysis the DMEIR does present is fraught with errors. For example, the DMEIR's analysis of the Project's traffic impacts relies on a model that is inaccurate and substantially underestimates future traffic volumes. Reliance on an inaccurate traffic model in turn implicates the EIR's air quality, public health, and noise analyses. In addition, the countless vague, voluntary, and unenforceable policies relied on as mitigation measures in the DMEIR fail to comply with CEQA, which requires enforceable, concrete commitments to mitigation. As a result, the DMEIR fails to describe measures that could avoid or substantially lessen the General Plan's numerous

significant impacts. The pervasive flaws in the document demand that the DMEIR be substantially modified and recirculated for review and comment by the public and public agencies.

The EIR is "the heart of CEQA." *Laurel Heights Improvement Ass'n v. Regents of University of California* (1988) 47 Cal. 3d 376, 392 (citations omitted) (*Laurel Heights I*). It is "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended 'to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.' Because the EIR must be certified or rejected by public officials, it is a document of accountability." *Id.* (citations omitted). Where, as here, the environmental review document fails to fully and accurately inform decision-makers, and the public, of the environmental consequences of proposed actions, it does not satisfy the basic goals of CEQA. *See* Pub. Res. Code § 21061.

For all the reasons set forth below, it is our opinion that the DMEIR does not comply with the requirements of CEQA. The DMEIR's failings will impact all Fresno residents, but will most directly and significantly impact low-income, disadvantaged residents and communities, especially communities of color in Central, Southeast, and Southwest Fresno. These communities are the most vulnerable to the impacts the DMEIR fails to adequately analyze or effectively mitigate. Thus, the DMEIR not only violates CEQA but results in violations of state and federal fair housing and civil rights laws, including but not limited to 42 U.S.C. §§ 2000d, 3601 *et seq.*, 5304(b)(2), 5306(s)(7B), and 12705, and Cal. Gov. Code §§ 1135, 12955 *et seq.*

The City must revise and recirculate the DMEIR to provide the public an accurate assessment of the environmental issues at stake, and a mitigation strategy—developed *before* General Plan approval—that fully addresses the Project's significant impacts. The City must also take a serious look at alternatives that can avoid or lessen the Project's significant impacts. The revised DMEIR should include the changes to the General Plan requested in the General Plan comments submitted by the Leadership Counsel for Justice and Accountability on August 18, 2014. These proposed revisions to the General Plan are feasible mitigation measures that can effectively reduce the Project's impacts.

This letter, along with the transportation report prepared by MRO Engineers (Exhibit A) and the air quality report prepared Baseline Environmental, Inc. (Exhibit B) constitute our comments on the DMEIR. Please refer to these reports for further detail

and discussion of the DMEIR's inadequacies with regard to impacts to transportation and air quality.

I. General Comments

The following are our general comments on the legal inadequacies of the DMEIR. More specific comments on individual sections of the document follow.

A. The DMEIR Improperly Attempts to Avoid Analysis and Mitigation of the General Plan's Impacts by Concluding that They Are Significant and Unavoidable.

Where all available and feasible mitigation measures have been proposed but are inadequate to reduce an environmental impact to a less-than-significant level, an EIR may conclude that the impact is significant and unavoidable. *See* CEQA Guidelines § 15126.2. If supported by substantial evidence, the lead agency may make findings of overriding considerations and approve the project in spite of its significant and unavoidable impacts. *Id.* at §§ 15091, 15093. However, the lead agency cannot simply conclude that an impact is significant and unavoidable and move on. A conclusion of residual significance does not excuse the agency from (1) performing a thorough evaluation and description of the impact and its severity before and after mitigation, and (2) proposing *all* feasible mitigation to "substantially lessen the significant environmental effect." CEQA Guidelines § 15091(a)(1); *see also id.* § 15126.2(b) (requiring an EIR to discuss "any significant impacts, *including those which can be mitigated but not reduced to a level of insignificance*" (emphasis added). "A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely." 1 Stephen Kostka & Michael Zischke, *Practice Under the California Environmental Quality Act* § 14.6 (2d ed. 2008).

The DMEIR finds that the City's plans for future growth and development as set out in the General Plan will result in 22 significant and unavoidable impacts in 10 different areas. DMEIR at 2-10 – 2-55. As detailed below, in numerous instances, the DMEIR fails to thoroughly assess impacts deemed to be significant and unavoidable or to identify all feasible mitigation measures to reduce the severity of the impacts.

B. The DMEIR Fails to Analyze the Impacts of All Development That Could Occur as a Result of Buildout Under the General Plan.

The General Plan acknowledges the harmful effects of unrestricted growth in the City, including increased reliance on personal automobile use and the inability to provide efficient public transit service to new development, which leads to increased air pollution and greenhouse gas emissions. General Plan at 3-6, 3-7, and 7-7. Yet, the General Plan proposes land use policies that fail to limit development in future growth areas. Specifically, the Plan includes objectives and policies that call for regulating growth by "promoting" development in certain parts of the City. (*See*, e.g., Objective UF-12 directing the City to locate *roughly* one half of future residential development in infill areas; emphasis added.) However, the Plan provides liberal definitions for terms such as "roughly" and "approximately" as applied in the Plan. Specifically, the Plan states that use of these terms is intended to be flexible so that depending on context, a reference to "approximately one-half" could vary at least 10 to 15 percent and use of the term "roughly" could include twice that amount or more. General Plan at 1-30. These vague definitions have important implications when applied to planning policy.

For example, General Objective UF-12 directs the City to locate "roughly one half" of future residential development in infill areas. But given the General Plan's flexible definition of the word "roughly," anywhere from 20 percent to over 80 percent of future development could occur in infill areas. However, the DMEIR presents only one set of estimates for the amount of anticipated development at build-out. *See* DMEIR Table 3-3. Thus, the DMEIR fails to disclose its assumptions for the amount of infill used (*i.e.*, 20 percent, 50 percent, or 80 percent of development in infill areas at build-out) for the analyses of the Project's environmental impacts. Given that the Plan allows a broad range of development to occur outside of infill areas, the DMEIR must evaluate potential impacts that would occur if only 20 percent of anticipated future development were to take place in identified infill areas, or better yet, revise General Objective UF-12 to ensure the majority of future development occurs in infill areas. If the majority of Project-related growth takes place outside the identified infill areas, Project impacts related to transportation, air quality and greenhouse gases would be much worse that the DMEIR indicates. These impacts would be even more severe in disadvantaged communities that are already over-burdened with inadequate access to transit and pollution.

C. The DMEIR Ignores Feasible Mitigation, Such as Changes to the Land Use Designations and Densities and Intensities Proposed in the General Plan.

For several of the General Plan's significant and unavoidable impacts, notably the Project's significant impact related to greenhouse gas emissions, the DMEIR concludes that no feasible mitigation is available. However, the DMEIR never considers changes to land use designations or densities and intensities as potential mitigation even though such changes could significantly reduce greenhouse gas emissions and other significant impacts disclosed in the DMEIR. CEQA requires the EIR to consider such mitigation.

The City cannot approve projects with significant environmental impacts if any feasible mitigation measure or alternative is available that will substantially lessen the severity of any impact. Pub. Res. Code § 21002; CEQA Guidelines § 15126(a). The City is legally required to mitigate or avoid the significant impacts of the projects it approves whenever it is feasible to do so. Pub. Res. Code § 21002.1(b). "In the case of the adoption of a plan, policy, regulation, or other public project [such as the General Plan], mitigation measures can be incorporated into the plan, policy, regulation, or project design." CEQA Guidelines § 15126.4(a)(2). Mitigation is defined by CEQA to include "[m]inimizing impacts by limiting the degree or magnitude of the action and its implementation." CEQA Guidelines § 15370(b). In addition to proposing new "policies" as mitigation, mitigation should include changes in where development is planned, what kind is planned, and how dense or intense that development is planned to be, *i.e.*, changes to land use diagram and land use designations.

There is no indication that the DMEIR considered modifications to land use designations or densities and intensities to mitigate the impacts of the General Plan. Yet those changes are the easiest, most effective, and most obvious ways to lessen or avoid many of the General Plan's impacts. For example, the Plan will result in locating a substantial amount of new industrial uses in close proximity to existing and proposed residential areas. DMEIR at Exhibit 3-4 Planned Land Use. This will in turn result in increased exposure of sensitive receptors, especially disadvantaged communities, to substantial pollutant concentrations. DMEIR at 5.3-62. Exploring alternative land use scenarios would go a long way toward reducing numerous significant General Plan impacts identified in the DMEIR, such as air quality, public health, climate change, traffic, and noise.

D. The DMEIR Cannot Rely on Unenforceable and Noncommittal General Plan Policies to Mitigate the Project's Significant Impacts.

Mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions, agreements, or other legally binding instruments. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2). The DMEIR relies on a number of General Plan policies to mitigate significant environmental impacts. *See*, for example, DMEIR at 5.3-48, 5.7-52, 5.10-11, Many of these General Plan policies and programs are vague, optional, directory, or otherwise unenforceable.

For example, the Plan fails to provide enforceable policies that direct stepped, orderly growth. Instead, the Plan includes policies that call for "promoting" development in certain parts of the City. (*See*, e.g., Policy LU-1-a directing the City to *promote* development within the existing City Limits and in infill areas and Policy LU-1-c directing the City to *promote* orderly land use development in pace with public facilities and services needed to serve development; emphasis added.) These vague and unenforceable policies fail to describe how the City will promote and enforce an orderly growth process and fail to ensure infill development will occur prior to development in the Growth Areas. General Plan Implementation Element at 12-30.

A few other examples of ineffective mitigation—out of numerous instances—include the following (emphases added):

- Policy RC-8-c: Energy Conservation in New Development. *Consider* providing an incentive program for new buildings that exceeds California Energy Code requirements by fifteen percent. DMEIR at 5.3-29.

- Policy RC-8-j: Alternative Fuel Network. *Support* the development of a network of integrated charging and alternate fuel stations for both public and private vehicles, and *if feasible*, open up municipal stations to the public as part of network development. *Id.*

- Policy LU-2-b: Infill Development for Affordable Housing. *Consider* a priority infill incentive program for residential infill development of existing vacant lots and underutilized sites within the City limits as a strategy to help to meet the affordable housing needs of the community. DMEIR at 5.7-25.

- Policy LU-6-b: *Consider* adopting commercial development guidelines to assure high quality design and site planning for large commercial

developments, consistent with the Urban Form policies of this Plan. DMEIR at *Id.*

- Policy LU-1-e: Annexation Requirements. *Consider* implementing policies and requirements that achieve annexations to the City that conform to the General Plan Land Use Designations and open space and park system, and are revenue neutral and cover all costs for public infrastructure, public facilities, and public services on an ongoing basis. DMEIR at 5.10-11.

- Policy LU-2-a: Infill Development and Redevelopment. *Promote* development of vacant, underdeveloped, and redevelopable land within the City Limits where urban services are available by *considering* the establishment and implementation of supportive regulations and programs. DMEIR at 5.10-12.

- Policy D-4-b: Incentives for Pedestrian-Oriented Anchor Retail. *Consider* adopting and implementing incentives for new pedestrian-friendly anchor retail at intersections within Activity Centers and along corridors to attract retail clientele and maximize foot traffic. DMEIR at 5.7-26.

- Policy D-4-f: Design Compatibility with Residential Uses. *Strive to ensure* that all new nonresidential land uses are developed and maintained in a manner complementary to and compatible with adjacent residential land uses, to minimize interface problems with the surrounding environment and to be compatible with public facilities and services. DMEIR at 5.10-13.

A general plan's goals and policies are necessarily general and aspirational. The City may rely on such policies to mitigate environmental impacts under CEQA, however, only if they will be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. *See Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal. App. 4th 342, 358 (citing *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal. App. 4th 351, 377). CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. *Anderson First Coalition v. City of Anderson* (2005) 130 Cal. App. 4th 1173, 1186-87 ; *Fed'n of Hillside & Canyon Ass'ns v. City of Los Angeles*(2000) 83 Cal. App. 4th 1252, 1261 .

Here, the General Plan's vague, unenforceable, and noncommittal policies and programs (and policies for which no implementation programs are identified) allow the

City to decide to take no action and thus fail to mitigate impacts. As a result, the DMEIR cannot ensure that the policies relied on will in fact be implemented to mitigate the General Plan's impacts. Therefore they cannot serve as CEQA mitigation. *See Anderson First*, 130 Cal. App. 4th at 1186-87.

II. The DMEIR's Analyses of and Mitigation for the General Plan's Environmental Impacts Are Legally Inadequate.

The evaluation of a proposed project's environmental impacts is the core purpose of an EIR. *See* CEQA Guidelines § 15126.2(a) ("An EIR shall identify and focus on the significant environmental effects of the proposed project"). As explained below, the DMEIR fails to analyze the Project's numerous environmental impacts, including those affecting land use, transportation and circulation, air quality, odor, climate change, public health and safety, and noise. In addition, in numerous instances, the DMEIR also fails to adequately analyze the Project's cumulative impacts. These inadequacies require that the DMEIR be revised and recirculated so that the public and decision-makers are provided with a proper analysis of the Project's significant environmental impacts and feasible mitigation for those impacts. See CEQA Guidelines, § 15002(a)(1) (listing as one of the "basic purposes" of CEQA to "[i]nform governmental decision makers and the public about the potential, significant environmental effects of proposed activities").

The "programmatic" nature of this DMEIR is no excuse for its lack of detailed analysis. CEQA requires that a program EIR provide an in-depth analysis of a large project, looking at effects "as specifically and comprehensively as possible." CEQA Guidelines § 15168(a), (c)(5). Because it looks at the big picture, a program level EIR must provide "more exhaustive consideration" of effects and alternatives than an EIR for an individual action, and must consider "cumulative impacts that might be slighted by a case-by-case analysis." CEQA Guidelines § 15168(b)(1)-(2).

Further, it is only at this early stage that the City can design wide-ranging measures to mitigate City-wide environmental impacts. *See* CEQA Guidelines § 15168(b)(4) (programmatic EIR "[a]llows the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility. . . ."). A "program" or "first tier" EIR is expressly not a device to be used for deferring the analysis of significant environmental impacts. *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal. App. 4th 182, 199. It is instead an opportunity to analyze impacts common to a series of smaller projects, in order to avoid repetitious analyses. Thus, it is particularly important that the DMEIR for the General Plan analyze the overall impacts for the complete level of development it is

authorizing now, rather than when individual specific projects are proposed at a later time.

The DMEIR, here, fails to provide the legally required analysis of the substantial growth that the General Plan allows and promotes. Thus, the City must revise the DMEIR to accurately disclose the impacts of the maximum density allowed by the General Plan it does propose to adopt. Detailed below are the specific legal inadequacies of the DMEIR's various impact sections.

A. The DMEIR's Analysis of and Mitigation for the General Plan's Transportation Impacts Is Factually and Legally Deficient.

The DMEIR's transportation and traffic analysis contains numerous deficiencies that must be remedied if the public and decisionmakers are to fully understand this Project's potential effects. Specifically, the evaluation of the Project's transportation and traffic impacts must be revised to address: (1) use of a deficient forecasting model; (2) use of outdated level of service ("LOS") analysis methodology; (3) use of obsolete traffic volume data; (4) failure to consider the effects of truck traffic; (5) deficient safety analysis; (6) failure to analyze impacts to pedestrians and bicyclists; and (7) deficient analysis of the Project's impacts on emergency access. These issues are discussed in greater detail in the September 10, 2014, letter of MRO Engineers ("MRO Letter"), which is attached as Exhibit A.

1. The DMEIR Contains No Evidence that Its Travel Demand Forecasting Model Actually Reflects Buildout Conditions Under the General Plan.

The DMEIR relies on what it describes as "a modified version of the Fresno COG countywide travel demand forecasting model" ("model") to develop its trip generation and vehicle miles traveled projections. DMEIR at 5.14-28. The theory behind use of this model is that if it can accurately predict existing traffic volumes (based on existing land uses and transportation system), then it will accurately predict future traffic volumes (based on future land use and transportation system projections). To ensure forecasting models accurately forecast existing, and hence future, traffic, they are subject to a model validation process by which analysts attempt to make the model replicate existing traffic volumes. Based on evidence presented in the DMEIR, the forecast model used for this analysis is not statistically valid (i.e. does not pass the validation tests) and thus fails to accurately predict project-related future traffic. MRO Letter at 2 and 3.

The model was subjected to three validation tests. DMEIR Appendix H-5 at 77. According to the DMEIR, the model failed all three tests. *Id.* In the first validation test, to pass, the traffic forecasts for 75 percent of the roadway links must fall within the allowable deviation. In other words, only 25 percent of the roadway links may fall outside that allowable value. In fact, only 60 percent of the roadway links met the target, meaning that a full 40 percent failed to do so. In this case, 199 of the 495 tested roadway links had traffic forecasts that were either excessively high or low, compared to the actual traffic counts. *Id.*

For the second validation test (the model validation for Percent Root Mean Square Error), the goal is less than 40 percent. The actual model validation result was 46 percent, six percent higher than the established goal. Thus, this validation test, consistent with the first test, reveals that the modified Fresno COG model does not accurately predict existing traffic.

And finally, the third validation test (the Correlation Coefficient) measures the degree of straight-line or linear association between two variables. MRO Letter at 3. A value of 1.00 would indicate a perfect relationship between the two variables. *Id.* That is, as one variable increases, the other variable increases in a linear fashion. *Id.* Under this test, the model accurately predicts traffic volume if the Correlation Coefficient *exceeds* 0.88. In this case, the Correlation Coefficient was 0.88, which missed the goal of *exceeding* 0.88. DMEIR Appendix H-5 at 77.

The use of a model that failed all three validation tests cannot provide accurate forecasts of future traffic volumes – it can't even predict existing volumes. MRO Letter attached as Exhibit A at 3. Clearly, more effort needs to be devoted to the model refinement process, with the goal of creating a travel demand forecasting model that actually provides credible forecasts of travel demand; the modified Fresno COG model used in the DMEIR traffic analysis fails in this regard. Once the model has been improved to the point that it is capable of replicating existing traffic volumes, then it will generate meaningful future traffic projections. The DMEIR traffic analysis must then be revised and the document needs to be recirculated for further public review. *Id.* Moreover, as discussed further below, because traffic volumes inform in large part the DMEIR's analysis of air quality, noise, and greenhouse gas impacts, those analyses must be revised and recirculated as well as they are compromised by the defective traffic forecasts.

2. The DMEIR Substantially Underestimates Project-Related Traffic at Buildout.

The traffic model's inaccuracy results in an analysis that substantially underestimates traffic volumes. As discussed above, 199 of the 495 tested roadway links had traffic forecasts that were either excessively high or low, compared to the actual traffic counts. MRO Letter at 3. Of those 199 deficient traffic forecasts, 120 (60 percent) were lower than the corresponding actual traffic count. *Id.* Moreover, of the 495 total roadway links, the traffic forecasts at 281 links (57 percent) were lower than the actual count. *Id. See* Attachment A to the MRO Letter Report at Appendix A. Thus, the DMEIR's traffic analysis underestimated existing traffic and thus underestimated future traffic impacts as well. Once the City accurately models the Project's increase in traffic volumes, it must revise the traffic analysis and other sections of the EIR implicated by the model results (*i.e.*, air quality, greenhouse gases, and noise).

3. The DMEIR's Analysis of Level of Service is Faulty.

The DMEIR's analysis of traffic impacts is also inadequate because it relies on an outdated methodology for analyzing intersection LOS. The LOS analysis was based on the year 2000 version of the Highway Capacity Manual ("HCM") rather than the current (year 2010) version. This violates the City of Fresno Traffic Impact Study Report Guidelines (City of Fresno, Department of Public Works, Updated February 2, 2009, at 3), which requires that the most current edition of the Highway Capacity Manual be used when analyzing projected traffic in the City. The DMEIR acknowledges that the methodologies described in the 2010 HCM manual set the prevailing standard for LOS analysis, but then inexplicably fails to use it. MRO Letter at 4. Moreover, the DMEIR fails to provide information regarding the specific input parameters that were used in the analysis. MRO at 4 and 5. The EIR's failure here to use current methodologies and fully describe the assumptions used results in an inaccurate analysis of traffic impacts and undermines CEQA's purpose of fully informing the public of the Project's environmental impacts. *See Laurel Heights I*, 47 Cal.3d at 404.

4. The DMEIR Relies on Obsolete Traffic Volume Data.

According to the City of Fresno's Traffic Impact Study Report Guidelines, the City's standard for use of existing traffic counts is that counts should be no more than 12 months old. City of Fresno Traffic Impact Study Report Guidelines at 7. The DMEIR bases its intersection analysis results on traffic counts obtained in 2012. DMEIR at 5.14-4. Therefore, the traffic counts used in the DMEIR are now two years old, which violates

the City's standard. In addition, use of the outdated traffic data violates accepted practice within the traffic engineering profession. Specifically, the Institute of Transportation Engineers specifies that ". . . traffic volume data should generally be no older than 1 year." 2006 Institute of Transportation Engineers (ITE), Transportation Impact Analyses for Site Development at 19. MRO Letter at 7.

Traffic volumes represent "the most critical input parameter" in evaluating level of service. MRO Letter at 7. If the traffic analysis uses the wrong numbers, it will misrepresent the environmental setting and project impacts. *Id.* Thus, the traffic impacts of the Project must be reanalyzed using up-to-date traffic volume data, and the EIR must be revised to reflect the corrected analysis.

5. The DMEIR Fails to Analyze the Project's Effects Related to Truck Traffic.

As discussed in detail in the MRO Letter, the DMEIR's analysis fails to explain the assumptions incorporated into the traffic analysis. MRO Letter at 5 and 7. Without an understanding of the input parameters that were applied to the analysis, it is impossible to determine whether the specific effects of project-related truck traffic were taken into account. *Id.* The proposed General Plan calls for substantial industrial land uses, particularly in the south and west Fresno areas. DMEIR at Exhibit 3-4. Consequently, the road system in those areas will be called upon to accommodate substantial truck traffic, which can add to congestion on area roadways. An analysis of truck traffic is important because trucks operate differently from passenger vehicles. For example, they are slower to accelerate, they need longer braking distances, and need a greater separation between vehicles. MRO Letter at 8.

Moreover, the DMEIR includes no discussion or analysis of auto-truck conflicts and the potential safety issues associated with mixing automobile traffic with a considerable amount of heavy vehicle traffic. This is a substantial deficiency in the DMEIR, given the extent of nearby residential land uses. A revised EIR must correct this deficiency.

6. The DMEIR Presents a Deficient Safety Analysis.

The DMEIR's analysis of safety conditions at build-out is incomplete and misleading. The DMEIR basis its analysis of safety impacts solely on the number of collisions at a small number of locations in Fresno. DMEIR at 5.14-15. Unfortunately, as the MRO Letter explains, this information is virtually meaningless because it fails to

account for the total volume of traffic at any given location. MRO Letter at 7. A valid traffic safety analysis will include the development and comparison of accident rates, in terms of collisions per million-vehicle-miles for key roadway segments. *Id.* The DMEIR, though, provides no such assessment and, therefore, it is impossible to determine whether the accident data indicates an existing safety problem. *Id.* The DMEIR must be revised to include a detailed analysis of plan-related safety impacts and to identify needed mitigation measures.

7. The DMEIR Fails to Analyze Project Impacts On Pedestrians and Bicyclists.

As noted above, the DMEIR relies on outdated methodology contained in the 2000 HCM. DMEIR at 5.14-4. Because it relies on outdated methodology, the DMEIR necessarily fails to consider potential impacts on pedestrians, bicyclists, and transit users as the 2000 HCM does not incorporate these modes of travel into its method of analysis. *Id.* By contrast, the 2010 HCM does. MRO Letter at 9. Therefore, the DMEIR's reliance on outdated methods results in a truncated analysis that fails to address multi-modal travel (*e.g.*, travel using different modes, including automobile, public transit, bicycle, or walking). This omission results in disproportionate impacts to residents in low-income neighborhoods, who are more likely to rely on walking, bicycling, and public transit for transportation.

Nor does the DMEIR provide a separate analysis (quantitative or qualitative) to address the potential impacts of the proposed General Plan with regard to the performance or safety of multi-modal roads and other facilities that will be used by pedestrians and bicyclists. DMEIR at 5.14-85. Instead, the DMEIR lists General Plan policies and objectives that address multi-modal travel. However, these policies fail to address pedestrian and bicyclist safety. For example, Policy LU-1-a directs the City to promote development within the existing City Limits and to promote infill development; Policy LU-1-c directs the City to promote orderly development in pace with public facilities to serve development; and Policy MT-4-I directs the City to promote the integration of bicycling with public transit by providing bike racks, etc. These and other listed policies do not address the safety or performance of multi-modal roads and roads and facilities. Consequently, there is simply no basis for the DMEIR's finding that implementation of the General Plan will result in less-than-significant impacts on pedestrians and bicyclists.

The DMEIR ignores Project factors that could lead to significant operational and safety-related impacts throughout the City as the plan is implemented. At the very minimum, transit users will suffer from the extensive travel delays imposed by a roadway system where LOS E and F are prevalent. Pedestrians and bicyclists are likely to be exposed to unsafe conditions, as frustrated motorists become impatient and make poor decisions leading to unsafe conditions. Moreover, the substantial increase in truck traffic associated with the increase in industrial uses will also increase safety risks for pedestrians and bicyclists. There have already been several incidents of pedestrian fatalities associated with trucks travelling to industrial facilities near neighborhoods in southwest Fresno, and pedestrian fatalities in the City are generally on the rise. *See* http://www.fresnobee.com/2014/08/19/4077804_woman-70-killed-in-fresno-when.html?rh=1 and http://abc30.com/news/more-pedestrians-are-being-hit-and-killed-by-cars-in-fresno/193481/ .

As pointed out in the MRO Letter, given the importance of non-automotive travel within the proposed plan, it is essential that the DMEIR include a meaningful analysis of the plan's impacts on those alternative modes. Such an analysis is absent from the current document.

8. The DMEIR Fails to Adequately Analyze the Project's Impacts on Emergency Access.

The DMEIR concludes that the Project would not adversely impact emergency access. DMEIR at 5.14-85. The DMEIR relies on the rationale that "an enhanced roadway network that accommodates forecasted travel demand would also provide adequate emergency access." DMEIR at 5.14-83. However, as discussed above and in the MRO Letter, the DMEIR itself demonstrates that the City's road system will not be able to accommodate forecasted traffic demand. MRO Letter at 10.

Specifically, the General Plan will allow most roadways in the City to operate at LOS F. DMEIR at 5.14-41. According to the definition of LOS F provided in the DMEIR:

> "LOS F is used to define *forced or breakdown conditions*. This condition exists wherever the volume of traffic *exceeds the capacity of the roadway*. Long queues can form behind these bottleneck points with queued traffic traveling in a stop-and-go fashion." (Emphasis added.) DMEIR at 5.14-4

As the definition makes clear, the City's future roadways will not provide adequate emergency access. Roads operating at LOS F will be clogged with traffic, which will impede all traffic, including emergency vehicles, resulting in delays in emergency response times. Delays in response times translate directly to patient fatalities. MRO Letter at 11. This is a significant impact that was ignored in the DMEIR.

B. The DMEIR Fails to Adequately Analyze and Mitigate the General Plan's Air Quality Impacts.

The City of Fresno, and the surrounding San Joaquin Valley Air Basin, suffer from some of the nation's worst air quality. Therefore, it is imperative that the DMEIR provide an accurate assessment of the Plan's potential to further degrade air quality. By its own admission, implementation of the General Plan would cause a substantial increase in air pollution. DMEIR at 5.3-62. However, the DMEIR's analysis of air quality impacts is grossly inadequate. In several instances, the DMEIR fails to analyze the Project's effects at all. Where the document does attempt to analyze impacts, it underestimates the increase in emissions because it underestimates the Project's increase in predicted traffic volumes. Moreover, the DMEIR fails to analyze the health effects that would occur as a result of exposure to these pollutants. Thus the DMEIR's analysis of air quality impacts does not comply with CEQA.

The fact is that this Project will have a devastating impact on local and regional air quality. Disadvantaged communities and people of color, who already suffer from health impacts of poor air quality, will feel these impacts more acutely than other City residents. Unfortunately, the details remain unknown because the DMEIR does not provide anything close to a complete analysis of these impacts. The most egregious flaws in the air quality analysis are described below. In addition, we incorporate by reference the letter dated October 7, 2014 from Baseline Environmental, Inc. ("Baseline Report").

1. The DMEIR Underestimates the Project's Air Quality Impacts Because it Underestimates the Amount of Traffic That Would Be Generated.

As discussed above, use of the deficient model has substantial ramifications for the environmental analysis. The DMEIR underestimates predicted traffic volumes because it relies on an inaccurate traffic model. Inasmuch as the air quality emissions are dependent on the transportation analysis assumptions, any underestimation of vehicular trips necessarily results in an underestimation of vehicular emissions. Once the City accurately models the Project's increase in traffic volumes, it must revise the air quality impact analysis.

2. The DMEIR Contains No Evidence that Its Air Emissions Model Actually Reflects Buildout Conditions Under the General Plan.

The estimates of future emissions in the DMEIR are not representative of the changes in emissions that would result from the proposed land uses changes in the General Plan Update. Baseline at 3. To forecast Project-related air quality emissions, the DMEIR does not look to the land uses in the General Plan, but rather relies on population growth estimates that are independent of the General Plan Update (i.e., the population growth estimates would be the same without the General Plan Update) . DMEIR at 3-25. Because the assumptions employed in the air emissions model are not presented in the DMEIR, it is not possible to determine if the model uses the same population and employment assumptions as the draft General Plan itself or if and how it considers the General Plan's land use designations. In other words, there is no evidence that the air emissions model is actually analyzing the impacts of the General Plan rather than some other scenario.

3. Violation of the Applicable Air Quality Plan

The DMEIR concludes the Project would not conflict with or obstruct implementation of the applicable air quality plans ("AQPs"). The applicable AQPs adopted by the San Joaquin Valley Air Pollution Control District ("SJVAPCD") include the following:

- The 2004 Extreme Ozone Attainment Demonstration Plan;
- The 2007 Ozone Plan;
- The 2007 PM10 Maintenance Plan and Request for Redesignation;
- The 2008 PM2.5 Plan;

- The 2012 PM2.5 Plan; and
- The 2013 Plan for the Revoked 1-hour Ozone Standard.

Baseline Report at 1.

The DMEIR explains that "[T]he growth projections used for the General Plan assume that growth in population, vehicle use and other source categories will occur at historically robust rates that are consistent with the rates used to develop the SJVAPCD's attainment plans." DMEIR at 5.3-32. However, the DMEIR fails to quantify population, vehicle use, and other source category growth projections used in the six applicable AQPs or the General Plan Update.

Similarly, the DMEIR states that "[R]eview of the proposed goals and policies of the General Plan Update found them to be consistent with the applicable control measures of the SJVAPCD attainment plan." DMEIR at 5.3-33. However, the DMEIR fails to document the review process relied upon to substantiate this conclusion. There is no discussion of the primary goals and control measures contained in the six applicable AQPs and how they compare to the goals and policies of the General Plan Update. We can find no evidence in the record to substantiate the conclusion that the Project is consistent with the applicable AQPs. An EIR must contain facts and analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 568.

4. Criteria Air Pollutant Emissions

There are numerous flaws in the DMEIR's criteria air pollutant analysis. First, the DMEIR's estimates of Project-related criteria pollutant emissions are inconsistent with estimates for the region made by the California Air Resources Board ("CARB") in the 2013 edition of The California Almanac of Emissions and Air Quality. Each year, CARB publishes a new Almanac that summarizes existing criteria pollutant emissions trends in each county and forecasts emissions from all stationary (including fuel combustion), area, and mobile sources. The forecasts take into account the most recent emissions data, projected growth rates, and future adopted control measures to estimate emissions in future years.

As described further in the Baseline Report, based on the CARB estimates of reactive organic gas ("ROG") emissions in 2010 in Fresno County, ROG emissions in the City would be approximately 12,000 tons. Baseline Report at 3. This estimate of

ROG emissions is about *four times greater* than the total 2010 estimate of 3,105 tons reported in Table 5.3-9 of the DMEIR at 5.3-42. Thus the DMEIR relies on an inaccurate baseline to analyze the General Plan air quality impacts. CEQA requires an accurate description of the existing environment. CEQA Guidelines § 15125(a); *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722. Without an adequate baseline, the DMEIR cannot meaningfully analyze the air quality impacts of the General Plan. Moreover, as further discussed in the Baseline Report and below, the faulty methodology used for preparation of the DMEIR results in inadequate analysis of pollutant emissions, including construction emissions, on-road motor vehicle emissions, electricity and natural gas emissions, and stationary and area source emissions. Baseline Report at 2.

The DMEIR's analysis of criteria pollutants is misleading. The DMEIR assumes that emissions from stationary sources will remain the same over the next 40 years because "it would be impossible to predict if the emissions would increase or decrease in the future." DMEIR at Table 5.3-9 footnote. This assumption is unsupportable. Stationary sources include industrial and manufacturing facilities that emit substantial amounts of criteria pollutants. DMEIR at Table 5.3-9. Inasmuch as the Plan's proposed land use map would result in more than 40 million square feet of new industrial uses likely to include stationary source emissions, the DMEIR's statement that future emissions from stationary sources may decrease is highly unlikely. DMEIR at 3-24.

The DMEIR's analysis of criteria pollutants also fails to include $PM_{2.5}$ emissions from stationary sources, stating only that this information is not available. DMEIR at Table 5.3-9. As explained in the Baseline Report, the CARB's database for the 2013 Almanac provides forecasts of pollutant emissions from stationary and area sources, including the emissions of $PM_{2.5}$, which are forecasted to increase over time. Baseline Report at 4. Using these existing trends and forecasts of pollutant emissions provided by CARB, the DMEIR can estimate $PM_{2.5}$ emissions, contrary to the DMEIR's claim. Without an analysis of $PM_{2.5}$ emissions, the current analysis of stationary and area source pollutant emissions violates CEQA. As discussed further below, an analysis of the Plan's increase in $PM_{2.5}$ emissions is particularly critical since $PM_{2.5}$ causes public health impacts. *See* $PM_{2.5}$ Designations Under the Clean Air Act, U.S. Environmental Protection Agency, attached as Exhibit C.

In addition, the DMEIR inappropriately employs project-level thresholds of significance to evaluate plan-level criteria pollutants. DMEIR at 5.3-38. As Baseline explains, project-level thresholds are meaningless when applied to an evaluation of the

total pollutant emissions estimated for all existing and future projects under the General Plan Update. The DMEIR should have, and could have, developed and applied thresholds of significance appropriate for planning documents. For example, the Bay Area Air Quality Management District provides guidance on preparing plan-level analyses and recommends the following criteria to evaluate operational-related criteria pollutants emissions for plans:

- Consistency with current AQP control measures; and
- A proposed plan's projected VMT or vehicle trips (either measure may be used) increase is less than or equal to its projected population increase.

The DMEIR could have used these criteria or other criteria appropriate for plan level projects.

As discussed above, the DMEIR presents an inadequate analysis of the General Plan's consistency with applicable AQP control measures, relies on an inadequate traffic analysis that underestimates the Project's increase in VMT, and fails to adequately analyze criterial air pollutants.

Meaningful analysis of impacts effectuates one of CEQA's fundamental purposes: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement v. Regents of Univ. of Cal.*(1994) 6 Cal. 4th 1112, 1123 (*Laurel Heights II*). The DMEIR fails to achieve this fundamental goal.

5. The DMEIR's Fails to Adequately Analyze the Project's Potential to Impact Public Health.

Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. *See* California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, attached as Exhibit D. Measurements of traffic-related pollutants show that concentrations within 300 meters (approximately 1,000 feet) downwind of freeways are higher than regional values. *Id.* at 8. In addition to respiratory health effects, proximity to freeways increases potential cancer risk. *Id.*

The DMEIR acknowledges that transportation is a major source of toxic air contaminants and particulate matter. DMEIR at 5.14-31. The DMEIR also acknowledges

that the build-out under the General Plan update would result in more than double the vehicle miles travelled in the City and the surrounding area. DMEIR at 5.14-29. Yet, the DMEIR fails to adequately analyze the Project's potential to expose nearby sensitive receptors to emissions of toxic air contaminants ("TACs") resulting from future increased VMT.

In addition, build-out of the proposed General Plan will result in a substantial additional industrial land uses, which are also sources of TAC emissions. The DMEIR impermissibly defers analysis and mitigation of these emissions. DMEIR at 5.3-60 and 5.3-61. These serious omissions are discussed further below.

(a) **The DMEIR Fails to Provide an Adequate Description of the Existing Setting.**

The DMEIR provides no information about existing exposure to TACs in the Planning Area, the starting point for any adequate analysis of a project's potential to impact public health. (See, DMEIR at 5.3-58 and 5.3-59 where the document provides information only about the risk at the County level.) This omission violates CEQA's core requirement that an EIR include an adequate "description of the physical environmental conditions in the vicinity of the project." CEQA Guidelines § 15125(a). Investigating and reporting existing conditions are "crucial function[s] of the EIR." *Save Our Peninsula Comm. v. Monterey County* (2001) 87 Cal. App. 4th 99, 122 ("SOPC"). "[W]ithout such a description, analysis of impacts, mitigation measures and project alternatives becomes impossible." *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 953. Decision-makers must be able to weigh the project's effects against "real conditions on the ground." *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal. App. 3d 229,246. "Because the chief purpose of the EIR is to provide detailed information regarding the significant environmental effects of the proposed project on the physical conditions which exist within the area, it follows that the existing conditions must be determined." SOPC, 87 Cal. App. 4th at 120 (internal quotations omitted). Unless the DMEIR adequately describes the public's existing exposure to TACs, decision-makers cannot: (1) understand the scope of the existing TAC problem; (2) measure the Project's new TAC impacts against a baseline of current TAC emissions; (3) evaluate mitigation of those impacts; or (4) intelligently decide whether the Project's approval is worth the risk.

Although not disclosed in the DMEIR, South Fresno neighborhoods, including in particular, West Fresno, Southeast Fresno, and Calwa are already subject to emissions

from existing industrial uses in the area and freeway traffic emissions. In fact, under the California Environmental Protection Agency's CalEnviroScreen 2.0, a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution, neighborhoods in South Fresno rank among the most burdened by multiple sources of pollution in the State of California.[1] Fifteen of the twenty highest scoring census tracts in California, and thus most burdened by multiple sources of pollution, under CalEnviroScreen 2.0 are located in Fresno within the 93706, 93721, 93725, 93701, and 93703 zip codes – all Southeast, Southwest, and Central Fresno zip codes. Census tracts in West Fresno rank as the first, second, and third most burdened census tracts in the State of California. Given the fact that the surrounding community is already disproportionally impacted by the number of industrial and refinery projects in the area, one would expect the DMEIR to comprehensively describe each of the sensitive receptors that could be potentially impacted by the Project. Unfortunately, this is not the case.

An adequate impact analysis would necessarily begin with a thorough description of existing sensitive receptors (*i.e.*, those segments of the population most susceptible to poor air quality (*i.e.*, children, the elderly, and those with pre-existing serious health problems affected by air quality). These receptor locations include residential communities, schools, daycare centers, playgrounds, and medical facilities. Yet, other than a generic statement that sensitive receptors located near TAC sources may be exposed to substantial pollutant concentrations, the EIR does not identify the specific location of any of these sensitive receptors. Nor does it describe the existing health of nearby sensitive receptors. It is imperative that the EIR disclose this information because a Project's potential to result in significant environmental impacts varies by setting. CEQA Guidelines § 15064(b). Thus, individuals who already suffer from high rates of asthma and other respiratory disease may experience greater-than-average sensitivity to Project-generated TAC emissions.

The EIR preparers could easily have obtained current TAC data from any of the following sources: EPA's AirData reports, or the TAC predictions in the National Air Toxic Assessment Model, which are available for every U.S. census tract.

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[1] See Microsoft Excel spreadsheet: A spreadsheet showing raw data and calculated percentiles for individual indicators and CalEnviroScreen scores for individual census tracts with additional demographic information: CalEnviroScreen_v.2.0.xls, available at http://oehha.ca.gov/ej/ces2.html.

http://www.epa.gov/nata2002/methods.html , or CalEnviroScreen_v.2.0.xls, available at http://oehha.ca.gov/ej/ces2.html.

(b) **The DMEIR's Analysis Fails to Correlate the Project's Emissions to Related Impacts on Human Health.**

The DMEIR's deficient analysis of the Project's health risks extends beyond its failure to describe the existing environmental setting. The DMEIR fails to include a health risk assessment ("HRA"). Given the Plan's enormous increase in VMT and in industrial uses – more than 40 million square feet – most of which will be concentrated in the southern portion of the City, there is a strong likelihood that the increase in TAC emissions would also be significant. *See* DMEIR at Table 5.14-3, indicating a significant increase in VMT and at Exhibit 3-4, indicating a high percentage of heavy industrial uses located in the western and southern areas of the City.

The increased VMT will in turn result in greater exposure to $PM_{2.5}$. The serious health risks associated with $PM_{2.5}$ exposure are well-documented. In its final rule designating attainment and non-attainment of $PM_{2.5}$ standards, the U.S. EPA noted the "significant relationship between $PM_{2.5}$ levels and premature mortality, aggravation of respiratory and cardiovascular disease . . . , lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems such as heart attacks and cardiac arrhythmia," particularly among "older adults, people with heart and lung disease, and children." See generally Air Quality Designations and Classifications for the Fine Particles ($PM_{2.5}$) National Ambient Air Quality Standards, 70 Fed. Reg. 944, 945 (Jan. 5, 2005) [Vol. 2, Ex. 28-e]; see also Land Use Guidance for Roadway Proximity Health Effects, attached as Exhibit E. This latter document elaborates on the health effects of particulate matter exposure, the epidemiology of roadway proximity health effects, and provides guidance for assessing these effects.

In addition to respiratory health effects, proximity to freeways increases potential cancer risk. *See* California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective at 8, attached as Exhibit D. The General Plan proposes development of residential uses in close proximity to super arterial roadways and major freeways. *See*, 2035 Fresno General Plan Land Use Diagram, dated August 8, 2012. For example, the Plan proposes dense residential neighborhoods immediately adjacent to super arterials in the northwestern portion of the City between Grantland and Herndon and in the southern portion of the City along Jensen, and in close proximity to SR 180. *Id.* In another example, General Plan Policy POSS-2-d directs the City to pursue

development of remnant parcels along freeway corridors for recreational uses, potentially locating neighborhood parks immediately adjacent to freeways and polluted air. Consequently, one would expect the DMEIR to vigorously examine the Project's impact on sensitive receptors in these communities and to mitigate for potential health risks. Unfortunately, the DMEIR fails to undertake this analysis.

With regard to exposure to TACs from stationary sources, the DMEIR is equally deficient. The DMEIR acknowledges that "new sensitive receptors located near existing toxic air contaminant sources may be exposed to substantial pollutant concentrations" (DMEIR at 5.3-54) and recognizes that "projects located near facilities with large numbers of diesel trucks such as distribution centers or loading docks in close proximity to receptors" may result in significant impacts. DMEIR at 5.3-55. But, the DMEIR stops short of analyzing those impacts. The DMEIR fails to map the location of existing TAC sources (e.g., freeways and gasoline dispensing facilities) and fails to analyze whether the proposed land use changes would increase exposure of sensitive receptors to TACs. Baseline Report at 6. Rather than conduct the necessary analysis to disclose the extent and severity of resulting health impacts on existing residents and proposed future residents from toxic air contaminants, the DMEIR defers the analysis to the future when individual projects are proposed. DMEIR at 5.3-55. This approach violates CEQA.

As discussed above, the City cannot defer its assessment of important environmental impacts until after the project is approved. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-07. In addition, an agency is not relieved from its obligation to provide environmental analysis simply because the task may be difficult. As explained by the Court, "[w]e find no authority that exempts an agency from complying with the law, environmental or otherwise, merely because the agency's task may be difficult." *Id.* at 399.

Moreover, courts have made clear that the EIR must not just identify that a project will result in health impacts from pollutants, but must analyze the impact of those emissions on the health of affected residents; in other words, the analysis must include a health risk assessment. *See Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219-20. Here, as explained above, health impacts to disadvantaged, pollution-burdened neighborhoods are likely to be even more severe than other areas of the City. The revised EIR must "correlate the identified adverse air quality impacts to resultant adverse health effects." *Id.* at 1219.

Health risk assessment procedures for mobile source toxics are well established. *See* Land Use Guidance for Roadway Proximity Health Effects, attached as Exhibit E. Relying upon available guidance, the revised DMEIR must include a health risk assessment that evaluates the Project's potential to result in cancer and respiratory health risks for nearby sensitive receptors.

(c) The DMEIR Impermissibly Defers Analysis of the Project's Significant Impacts on Public Health.

As the DMEIR itself explains, the Air Resources Board Land Use Handbook (2005) provides recommendations regarding siting sensitive uses (*e.g.*, residential uses, schools, etc.) to avoid or lessen impacts to public health. DMEIR at 5.3-55. For example, the Air Resources Board specifies that, because transport refrigeration unit operations and truck travel in and out of distribution centers are the largest onsite diesel PM emission sources, sensitive receptors should be located at least 1,000 feet away from such uses. Air Resources Board Land Use Handbook at Table 1-1 and Table 1-2. But once again, the DMEIR fails to apply those recommendations to the Project. Instead, the DMEIR defers analysis and mitigation of the Plan's impacts on public health and proposes a requirement that health risk assessments be prepared in the future. DMEIR at 2-12, 2-13 and 5.3-60.

As explained above, the EIR is obliged to identify feasible, enforceable measures to reduce significant impacts. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2). The California Attorney General recently weighed in on the importance and feasibility of measures to protect public health from the risks posed by transportation sources of pollution. In February 2013, the Attorney General settled a case in connection with the 1.1 million square-foot Mira Loma Commerce Center in Jurupa Valley. *See* Consent Judgment, Case No. RIC1112063, attached as Exhibit F. The settlement requires the City of Mira Loma and/or the developer to implement specific measures to reduce health risks from additional traffic. For example, they must provide air-filtration systems to nearby homes, monitor air quality, install solar panels and charging stations for e-vehicles, and ban heavy trucks on a major road near impacted residents. *Id.*

The City must consider and adopt measures to protect sensitive receptors from the health impacts caused by the increase in air pollutants that will accompany implementation of the General Plan. These should include the measures identified in the Consent Decree. The DMEIR's deferral of the analysis and mitigation of these health impacts violates CEQA. The DMEIR must be revised to include a health risk assessment

of all of these Project-related emissions and must identify feasible, enforceable mitigation to eliminate or reduce significant impacts to public health.

6. The DMEIR Fails to Adequately Analyze the Potential for Development Under the General Plan to Create Objectionable Odors.

Industrial and commercial uses proposed by the General Plan have the potential to generate odors and to impact nearby sensitive receptors. As CARB makes clear "the types of facilities that can cause odor complaints are varied and can range from small commercial facilities to large industrial facilities…". California Environmental Protection Agency and California Air Resources Board Air Quality and Land Use Handbook: A Community Health Perspective, 2005 at 29 and 30 ; excerpts attached as Exhibit D. Odors can cause health symptoms such as nausea and headache. *Id.* Facilities with odors may also be sources of toxic air pollutants. *Id.* Despite these facts, the DMEIR pays short shrift to this important issue. The DMEIR's cursory discussion omits any actual analysis of how sources of odorous emissions caused by implementation of the General Plan would impact sensitive receptors. The DMEIR defers this important analysis to the future, when specific projects are proposed and concludes, absent any evidence, that impacts relating to odorous emissions would be less than significant. DMEIR at 5.3-64. The DMEIR can hardly conclude that no sensitive receptors will be affected by manufacturing and industrial odors if there is no plan to ensure that such receptors will not be located near the odor sources.

The purpose of the General Plan is to guide the growth and development of the City. Locating adequate sites for industrial and commercial development will become more difficult upon buildout of the City. Sensitive land uses must be protected from these incompatible uses. Under the General Plan as currently proposed, with its lack of effective policies to avoid odor-related land use conflicts, the DMEIR must assume that the City will be built out to the maximum density allowable. It must then be revised to include a comprehensive assessment of odors caused by the proposed Project. The San Joaquin Valley Air Pollution Control District ("SJVAPCD") provides guidance for conducting this analysis. Exhibit G at 26-28 and 50-51 (SJVAPCD Guide For Assessing And Mitigating Air Quality Impacts). Should the analysis determine that the Project's odor impacts are significant, the EIR must identify feasible mitigation measures to avoid and minimize impacts on sensitive receptors.

7. The DMEIR Fails to Identify Feasible Measures to Mitigate the Project's Significant Air Quality Impacts.

Despite that fact that the DMEIR discloses that the Project would have a significant impact related to cumulative increases in ozone precursors and PM emissions, the document fails to identify feasible measures to lessen those impacts. Instead, the DMEIR relies on a list of proposed General Plan policies to mitigate the identified impacts and summarily states that " no mitigation measures beyond the General Plan policies, ordinances, and regulations are available to further reduce this impact." DMEIR at 5.3-50. Contrary to this statement, and as explained in the Baseline Report, the SJVAPCD's Guide for Assessing and Mitigating Air Quality Impacts ("District Guide") provides guidance regarding additional mitigation measures. The District Guide recommends incorporating as many of the policies from the SJVAPCD's Air Quality Guidelines for General Plans (AQGGP) into a General Plan as possible. See AQGGP attached as Exhibit H. The AQGGP, which was adopted in 1994 and amended in 2005, is a guidance document that contains 75 examples of policies that the cities can directly incorporate into their General Plan. Baseline Report at 6. The General Plan incorporates some, but not all, of the policies from the AQGGP, yet the DMEIR fails to explain why many of the applicable policies were not included. *Id.*

The District Guide also recommends evaluating plan-level mitigation measures by quantifying the associated reductions in mobile and area source emissions. The DMEIR foregoes this analysis entirely. The DMEIR contains no discussion or quantification of the effectiveness of the proposed policies to reduce air quality impacts. Therefore, the DMEIR fails to show that the proposed policies would be effective or to what degree they would mitigate the Project's impacts.

8. The DMEIR Fails to Adequately Analyze or Mitigate the Plan's Cumulative Air Quality Impacts.

The DMEIR's analysis of cumulative impacts is incomplete, cursory and superficial. The DMEIR initially relies on the Project's consistency with the applicable AQPs to conclude that cumulative impacts would be less than significant. DMEIR at 5.3-49. It then goes on to state that since Project-related emissions exceed the SJVAPCD quantitative thresholds for criteria pollutants, cumulative air emissions impacts would be potentially significant. As described above, and in the Baseline report, the DMEIR lacks the evidentiary support to conclude that the Plan is consistent with the applicable AQPs.

Furthermore, applying project-level thresholds of significance is inappropriate and fails to disclose the extent and severity of the Project's cumulative impacts.

The EIR must be revised to include a proper Plan-specific and cumulative air quality analysis. In regards to the cumulative analysis, the EIR preparers must examine the combined effects of both the proposed Plan and the other related projects in the air basin. There are two parts to this question: (a) is there a significant impact to the environment that is the result of the effects of the General Plan combined with the effects of other projects, and (b) is the General Plan's contribution to this impact cumulatively considerable? CEQA Guidelines § 15064(h)(1), 15355(b). The DMEIR must then identify mitigation for this contribution.

C. The DMEIR Fails to Adequately Analyze and Mitigate for the General Plan's Greenhouse Gas Emissions.

Analysis of greenhouse gas emissions is particularly important with regard to climate change because existing conditions are such that we have already exceeded the capacity of the atmosphere to absorb additional greenhouse ("GHG") emissions without risking catastrophic and irreversible consequences. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. *See Communities for Better Env't v. California Resources Agency* (2002) 103 Cal. App. 4th 98, 120 ("the greater the existing environmental problems are, the lower the threshold for treating a project's contribution to cumulative impacts as significant."); *see also Center for Biological Diversity v. National Highway Traffic Safety Administration*, 508 F.3d 508, 550 (9th Cir. 2007) ("we cannot afford to ignore even modest contributions to global warming."). Here, the DMEIR underestimates emissions, presents an incomplete analysis, and fails to identify feasible mitigation measures.

1. The DMEIR Underestimates the Project's GHG Emissions.

As discussed above, the DMEIR underestimates predicted traffic volumes because it relies on an inaccurate traffic model. Inasmuch as the greenhouse gas emissions are dependent on the transportation analysis assumptions, any underestimation of vehicular trips necessarily results in an underestimation of vehicle-related greenhouse gas emissions. Once the City accurately models the Project's increase in traffic volumes, it must revise the greenhouse gas emissions impact analysis.

2. The DMEIR's Conclusion that the Project Will Not Conflict With Relevant Plans to Reduce GHG Emissions Is Not Supported By Substantial Evidence.

The DMEIR recognizes that the Project will have significant GHG-related impacts if it will conflict with an applicable plan, policy, or regulation that was adopted for the purpose of reducing the emissions of GHGs. DMEIR at 5.7-41. However, the DMEIR concludes that the Project will not conflict with any such plan, and therefore will not have a significant impact. DMEIR at 5.7-60. The EIR's analysis on this point is flawed.

The DMEIR errs in two ways. First, the DMEIR considers the Project's consistency with only a subset of relevant plans and policies. The DMEIR limits its analysis to whether the Project will conflict with Assembly Bill 32 and the California Air Resources Board's Scoping Plan implementing AB 32. DMEIR at 5.7-56 ("Currently, the only applicable plan, policy or regulation of the City of Fresno is the Air Resources Board's Scoping Plan implementing AB 32."). However, AB 32 and the Scoping Plan are not the only relevant policies and plans that have been adopted for the purpose of reducing GHG emissions. The DMEIR fails to analyze the Project's consistency with Senate Bill 375 and the recently adopted regional transportation plan/sustainable communities strategy ("RTP/SCS") for Fresno County. DMEIR at 5.7-56-59 and 5.10-14 (describing and analyzing consistency with various local, regional and statewide plans, but not SB 375 or the RTP/SCS); DMEIR at 5.7-54 (describing SB 375 and RTP/SCS). In addition, the DMEIR fails to analyze the Project's consistency with Executive Order ("EO") S-3-05, which sets forth state policy related to GHG reduction, including that it is the policy of the state to reduce GHG emissions to 80% below 1990 levels by 2050. The DMEIR's failure to analyze the Project's consistency with the above plans and laws means that the City has failed to proceed in the manner required by law.

Second, the DMEIR lacks substantial evidence to support its conclusion that policies for new development will achieve the stated reductions or that those reductions will meet the goals of AB 32. The DMEIR acknowledges the Project will result in a doubling of greenhouse gas emissions at Project build-out. DMEIR at Table 5.7-2 (indicating that 2010 baseline GHG emissions total 3, 652,521 MTCO2e) and Table 5.7-6 (indicating that 2056 GHG emissions at build-out will total 6,286,229 MTCO2e). The DMEIR then relies on vague and unenforceable General Plan objectives and policies to mitigate Project-related GHG emissions. See DMEIR at 5.7-52. For example, the DMEIR policies focusing on infill development and sequencing of future growth are unenforceable. As discussed earlier in this letter, objective UF-12-a and Policies LU-1-a and LU-1-c fail to reduce GHG impacts because orderly growth is not guaranteed.

Because these policies will not ensure sequenced growth in infill areas, the DMEIR cannot rely on them to reduce GHG emissions. Therefore, the DMEIR fails to provide evidence that the General Plan policies will result in emissions reductions at build-out sufficient to comply with all applicable plans and laws, including EO S-3-05. See Pub. Res. Code § 21082.2(c) ("[a]rgument, speculation, unsubstantiated opinion or narrative, [and] evidence which is clearly inaccurate or erroneous" does not constitute substantial evidence); see also *Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal. App. 4th 1, 17 ("[C]onclusory statements do not fit the CEQA bill.").

Finally, the Plan establishes land uses and densities to 2056, yet the DMEIR only identifies mitigations for development to the year 2035, based on the AB 32 target date. The DMEIR states that "*If* the State ultimately sets targets based on achieving 80 percent reduction below 1990 levels by 2050, additional reductions beyond currently adopted regulations will almost certainly be needed by 2035." DMEIR at 5.7-50; emphasis added. This approach is not permissible under CEQA. The State *has already* set the target of achieving 80 percent reduction below 1990 levels by 2050 in Executive Order S3-05.

In *Cleveland National Forest Foundation v. San Diego Association of Governments*, the Superior Court held that SANDAG's EIR for its Regional Transportation Plan was

> "impermissibly dismissive of Executive Order S-03-05. SANDAG argue[d] that the Executive Order does not constitute a 'plan' for GHG reduction, and no state plan has been adopted to achieve the 2050 goal. [ROA 62 at 34] The EIR therefore does not find the RTP/SCS's failure to meet the Executive Order's goals to be a significant impact. This position fails to recognize that Executive Order S-3-05 is an official policy of the State of California, established by a gubernatorial order in 2005, and not withdrawn or modified by a subsequent (and predecessor) governor. Quite obviously it was designed to address an environmental objective that is highly relevant under CEQA (climate stabilization). . . SANDAG thus cannot simply ignore it."

Ruling on Petitions for Writ of Mandate, Dec. 3, 2012, pp. 11-12, attached as Exhibit I. So too here, the City ignores EO S-03-05 when analyzing the significance of the Project's GHG impacts. The City cannot have it both ways. If it is not prepared to implement policies to ensure the necessary emission reductions to achieve targets in 2050, than it cannot approve a plan that allows the proposed densities to 2056.

3. The DMEIR Fails to Include Mitigation Measures for the Project's Significant GHG Emissions.

The DMEIR fails to meet the requirements of CEQA because it fails to propose feasible mitigation measures to reduce the Project's significant impacts on climate change. Instead, it states that there are no feasible mitigation measures beyond the General Plan policies already identified. DMEIR at 5.7-56. However, because the Project's GHG emissions will cause a significant impact, the DMEIR must analyze, and the City must adopt, all feasible mitigation to reduce those impacts.

The DMEIR estimates the Project's resulting vehicle miles travelled ("VMT") at build-out will increase by almost 9,000,000 vehicle miles, an increase of 95 percent. DMEIR at Table 5.14-3. Under cumulative conditions, total VMT is projected to increase by over 111 percent to 10,487,655 vehicle miles. *Id.* This increase in VMT translates directly to an increase in greenhouse gases. Yet, despite this shocking increase in VMT, the DMEIR fails to identify *any* feasible measures to reduce VMT. DMEIR at 2-37 to 2-38.

California has committed itself to a substantial reduction in greenhouse gas emissions, a vast majority of which are supplied by vehicular travel. In September 2013, the Governor signed into law Senate Bill 743, which calls for a shift away from automobile delay as a metric for determining significant transportation impacts under CEQA and a recognition of the importance of reducing VMTs to reduce GHG emissions. This shift will encourage smart growth and infill development and reduce the amount of GHG produced by vehicle travel. *See* Final Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 ("SB 743 Guidelines") attached as Exhibit J. To this end, the SB 743 Guidelines direct lead agencies to analyze *and mitigate* vehicle miles traveled, induced travel, and safety. *Id.* at 8.

Even though the SB 743 Guidelines implementing SB 743 operate prospectively and are still in draft form, the City should recognize the importance of reducing VMT to minimize not just greenhouse gas emissions but traffic, air quality, and noise impacts as well. SB 743 was passed a year ago and its mandate is clear. Unfortunately, the DMEIR largely ignores the impact of the increase in VMTs and the opportunity to reduce VMTs as effective mitigation for GHG impacts.

There are numerous feasible mitigation measures the City could adopt to reduce the Plan's GHG, air quality and other impacts. Some examples include:

- Create funding incentives for projects that conform to the General Plan and development approvals to smart growth and infill development standards such as LEED Neighborhood Development standards. Alternatively, the City could adopt a policy that it will not provide future funding for widening roadways to serve sprawl developments, but will instead prioritize funding for projects that serve development adjacent to or within already developed areas.

- Institute city-wide parking pricing policies.

- Adopt any number of policies that apply to new development within its jurisdiction. For example, it could:

    - Adopt an ordinance requiring payment of indirect source impact fees from development projects, similar to what the San Joaquin Valley Air Pollution Control District requires in order to offset air pollution. The fee could be tailored to address traditional air pollution, toxic air contaminants, as well as GHG emissions.

    - Adopt energy efficient building standards that are higher than Title 24. More than 35 cities and counties in the state have applied to and/or received approval from the California Energy Commission to set energy efficiency standards that are more strict than Title 24. *See* Energy Commission fact sheet, available at http://www.energy.ca.gov/title24/2008standards/ordinances/; *see also* Public Resources Code Section 25402.1(h)(2); *see also* Exhibit K [Institute for Local Govt Best Practices] at 9.

    - Adopt an ordinance requiring new development to install a certain amount of solar or other alternative electric generation capacity. As demonstrated by the meteoric rise of distributed solar energy generation, installing such

generation is feasible. In fact, other cities in California already require that all new housing within their city provide solar energy generation capacity. In 2013 the City of Lancaster, for example, updated its municipal code to require that all new homes constructed in the city provide a minimum average solar generating capability of .5 to 1.5 kW per unit depending on lot size and location; new multi-family developments are also covered by the ordinance. (In lieu of constructing solar equipment on site, developers may elect to purchase solar energy credits from other facilities within the city.) *See* Spreading Sunshine All Over the Place, attached as Exhibit L; *see also* http://www.greentechmedia.com/articles/read/Lancaster-CA-Becomes-First-US-City-to-Require-Solar. Likewise, the City of Sebastopol now requires "new residential and commercial buildings -- as well as major additions and remodels -- to include a photovoltaic energy-generation system. The system would have to provide 2 watts of power per square foot of insulated building area or offset 75 percent of the building's annual electric load." *See* Press Democrat article at http://www.pressdemocrat.com/csp/mediapool/sites/PressDemocrat/News/story.csp?cid=2224191&sid=555&fid=181.

- Adopt a policy conditioning funding of certain transportation projects on a demonstration that the project will reduce vehicle-miles traveled.

- Offer fee reductions, waivers, loans or grants to developers and contractors who commit to verifiable green building practices that exceed state minimum standards. See Exhibit K[Institute for Local Govt Best Practices] at 9.

- Provide incentives for new development projects to install home or business electric vehicle charging stations, alternative energy systems or energy efficiency upgrades. See Exhibit K [Institute for Local Govt Best Practices] at 11.

- Review and adopt other policies such as those outlined in the Institute for Local Government's Best Practices guide. See Exhibit K.

Even if the City cannot feasibly adopt some of these measures as part of its approval of the General Plan, it certainly can commit to developing and adopting specific measure in the future, provided it includes proper performance standards that will guide it in developing the measures. *Gray v. County of Madera* (2008) 167 Cal. App. 4th 1099

Other agencies routinely require mitigation for residential and mixed-use development projects that include requirements to use renewable energy or install on-site solar power. For instance, Riverside County has previously required large development projects to meet the following standard: "80 percent of residential units shall meet 60 percent of their baseline demand power energy needs with renewable energy; and 80 percent of commercial building square footage shall meet 40 percent of their baseline demand power energy needs with renewable energy." Travertine Point Specific Plan Conditions of Approval, attached as Exhibit M, p. 118. If the developer cannot show that the local electricity provider is meeting these standards, than renewable energy must be provided from on-site sources. *Id.* Likewise, Riverside County also required this project to install cool pavement and cool roofs. *Id.* (see p. 90, measure 30. Planning 111); see also *id.*, pp. 88-94 (requiring other energy and water efficiency measures).

Likewise, the building industry is rapidly advancing in its ability to offer energy efficient homes. For example, Shea homes now offers a zero-energy home that offsets all of the home's energy use by using efficient building techniques and having solar power on the roof. See Exhibit N. Courts have made clear that "if [a] project can be economically successful with mitigation, then CEQA requires that mitigation …." *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 599-600. Given that Shea has sold more than 1,000 zero-energy homes, and that the technology for providing solar power has become much more affordable over the past few years, it is certainly feasible for the City to require Fresno developers to provide zero-energy homes to mitigate the Project's GHG impacts. The DMEIR has certainly offered no evidence to the contrary.

D. The DMEIR Fails to Adequately Analyze the Project's Noise Impacts.

The noise that will result from implementation of the General Plan will detrimentally effect communities of color and other low-income residents living near freeways, arterial roadways, and industrial sites. Some of the worst-affected sensitive receptors are located immediately adjacent to area freeways and arterials. The DMEIR admits that operational noise at General Plan buildout would adversely affect residential and other noise-sensitive uses. DMEIR at 5.11-25. However, given that the DMEIR's traffic analysis underestimates Project-related traffic, operational noise impacts at adjacent residential areas are likely to be even higher than the DMEIR discloses.

The World Health Organization recognizes noise, and in particular traffic noise, as a serious public health problem. See excerpts from *Traffic Noise Reduction in Europe*, attached as Exhibit O. Given the severity of the Project's potential noise impacts, coupled

with the effect that elevated noise levels has on public health, the DMEIR should have rigorously examined this issue. Yet, the DMEIR falls far short in this regard. The DMEIR fails to adequately analyze or effectively mitigate noise impacts, thus violating CEQA.

1. The DMEIR Fails to Evaluate Single Noise Events and Nighttime Noise.

One particularly egregious oversight is the DMEIR's failure to evaluate single noise events or nighttime noise. Motor vehicle noise is characterized by a high number of individual events, which often create a higher sustained noise level in proximity to areas sensitive to noise exposure. *See* Riverside County General Plan excerpts, at 19, attached as Exhibit P. Moreover, heavy trucks and tractor-trailers generate significantly more single noise events than other vehicle types. Revving truck engines and screeching brakes rise above the continuous roar of freeway traffic. *Id.*

The DMEIR acknowledges that transportation sources are the primary source of substantial noise in the City. DMEIR at 5.11-8. In addition, as discussed above, VMT in the City is projected to more than double at build-out of the General Plan. DMEIR at Table 5.14-3. Much of the increase in VMT will likely take place on area freeways and arterial roadways. The DMEIR's noise analysis should have evaluated how single noise events from trucks traveling along the freeway would impact nearby sensitive receptors.

In addition, the location of industrial development adjacent to residential uses means more trucks travelling to industrial sites along community streets that serve residences and schools. This too will result in significant single event noise impacts that the DMEIR fails to adequately analyze. These impacts are exacerbated at night when residents are asleep and background noise is low.

Analyzing only average noise impacts has been rejected by California courts because impacted residents do not hear noise averages, but single events. *See Berkeley Keep Jets Over the Bay Committee v. Port of Oakland* (2001) 91 Cal.App.4th 1344, 1382. Single event noise levels have been shown to disrupt sleep, interfere with speech, and cause stress and annoyance. Noting that "sound exposure level [SEL] has been found to be the most appropriate and useful descriptor for most types of single event sounds," the court in *Berkeley Keep Jets* held that the Port must prepare a supplementary noise analysis calculating the impacts of single-event sounds. *Id.* at 1382. Accordingly, the revised DMEIR for the Project must analyze the impacts of daytime and nighttime single event noise on schools, sleep, speech, stress, and annoyance levels, and analyze adequate measures to mitigate those impacts.

2. The DMEIR Does Not Evaluate Noise Impacts From Soundwalls.

CEQA requires that an EIR analyze whether identified mitigation measures would cause significant effects in addition to those that would be caused by the project. *See* CEQA Guidelines § 15126.4(a)(1)(D) and *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986. The DMEIR fails to examine the noise implications from implementing the soundwalls proposed as mitigation for roadway noise. While soundwalls generally reduce traffic noise, as studies show, the sound waves that travel around the ends and over the top of the sound walls can be significant, as well as the sound waves reflecting off of other nearby buildings and structures. *See* Sound Walls: Absorptive versus reflective design and effectiveness, Sound Fighter® Systems, attached as Exhibit Q. As the cited study explains, reflection is a critical factor when a vehicle (such as a truck) is almost as tall as the wall, or in many cases, taller than the wall. The sound levels at the receiver can be easily increased perhaps 3 to 5 dB, and sometimes up to 7 dB via reflective noise. *Id.* The DMEIR fails to account for these effects and fails to provide substantial evidence supporting its conclusion that soundwalls would effectively reduce noise. The revised DMEIR must study the effect that the soundwalls may have on sensitive receptors.

3. The DMEIR Fails to Mitigate Significant Noise Impacts.

The DMEIR specifies that operational noise would exceed the City's standards and could be as high as 76 dBA CNEL. DMEIR at Table 5.11-13. Clearly these severe increases in noise levels warrant a comprehensive identification of mitigation measures that would minimize impacts on sensitive receptors. Yet, once again, the DMEIR states that no other mitigation is available. As discussed above, the DMEIR should have considered the most obvious mitigation - modifications to land use designations to minimize impacts to sensitive receptors.

Moreover, as explained in the August 18, 2014 letter to the City from the Leadership Council for Justice and Accountability, the proposed General Plan policies regarding noise should be strengthened. Specifically, Policy NS-1-k should require that developers reduce the noise impacts of new development "on properties adjacent to the project or roadways that will receive vehicle traffic associated with the project through appropriate means." See LCJA letter to the City dated August 18, 2014 at 51. Policy NS-1-j should be revised to ensure that cumulative noise impacts are evaluated and mitigated separately from project-level noise impacts. *Id.* at 52. The City is obliged to consider

these and other mitigation measures capable of reducing the Project's significant noise impacts.

III. The DMEIR Should Be Recirculated.

CEQA requires recirculation of an EIR when significant new information is added to the document after notice and opportunity for public review was provided. CEQA § 21092.1; CEQA Guidelines § 15088.5. "Significant new information" includes: (1) information showing a new, substantial environmental impact resulting either from the project or from a mitigation measure; (2) information showing a substantial increase in the severity of an environmental impact not mitigated to a level of insignificance; (3) information showing a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure; or (4) instances where the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft EIR was essentially meaningless. CEQA Guidelines § 15088.5(a); *Laurel Heights II*, 6 Cal. 4th at 1130.

As this letter explains, the General Plan DMEIR clearly requires extensive new information and analysis. This analysis will likely result in the identification of new, substantial environmental impacts or substantial increases in the severity of significant environmental impacts. Moreover, the flaws that permeate the entire document, particularly the DMEIR's deferred analysis and mitigation, constitute precisely the sort of pervasive flaws in the document that independently require recirculation under CEQA Guidelines section 15088.5(a)(4). *See Mountain Lion Coalition v. Fish & Game Comm'n*, 214 Cal. App. 3d 1043, 1052-53 (1989). Consequently, the City must revise and recirculate the revised DMEIR for public review and comment.

IV. Conclusion

As described above, the DMEIR violates CEQA in numerous respects. Unfortunately, the impact of the CEQA violations will be felt most acutely by low-income residents and communities of color. If not remedied, this disproportionate impact on people of color will result in violations of both state and federal civil rights and fair housing laws. Through the environmental review process, the City has an opportunity to develop a final General Plan that minimizes the Project's significant impacts and complies with CEQA, while at the same time ensuring that the most disadvantaged neighborhoods in Central, Southeast, and Southwest Fresno don't bear the burdens of the City's growth.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Tamara Galanter

Carmen Borg, AICP, Urban Planner

Exhibits:

Exhibit A:	MRO Engineers Letter Report
Exhibit B:	Baseline Environmental, Inc. Report
Exhibit C:	Fact Sheet $PM_{2.5}$ Designations under the Clean Air Act, August 2008, United States Environmental Protection Agency Region 10
Exhibit D:	Air Quality and Land Use Handbook: A Community Perspective, April 2005, California Environmental Protection Agency California Air Resources Board
Exhibit E:	Land Use Guidance for Roadway Proximity Health Effects, May 6, 2008, Rajiv Bhatia and Thomas Rivard
Exhibit F:	Consent Judgment, Case No. RIC1112063, *CNFF v. SANDAG*
Exhibit G:	Guide for Assessing and Mitigating Air Quality Impacts, January 10, 2002, Mobile Source /CEQA Section of the Planning Division of the San Joaquin Valley Air Pollution Control District
Exhibit H:	Air Quality Guidelines for General Plans, Revised June 2005, San Joaquin Valley Air Pollution Control District

Exhibit I:	Ruling on Petitions for Writ of Mandate, Case No. 2011-00101593, *Cleveland National Forest Foundation, et al., v. San Diego Association of Governments*
Exhibit J:	CEQA Guidelines Implementing Senate Bill 743
Exhibit K:	Sustainability Best Practices Framework, Institute for Local Government
Exhibit L:	Spreading Sunshine All Over the Place, June 2013, City of Lancaster, CA
Exhibit M:	Travertine Point Specific Plan Conditions of Approval
Exhibit N:	*Zero-nèt-energy homes: More feasible, still rare,* March 29, 2013, Blanca Torres, San Francisco Business Times
Exhibit O:	*Traffic noise reduction in Europe*, August 2007, L.C. den Boer and A. Schroten
Exhibit P:	Chapter 7: Noise Element, Riverside County General
Exhibit Q:	PlanSound Walls: Absorptive versus reflective design and effectiveness, Sound Fighter® Systems, LLC

EXHIBIT A

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September 10, 2014

Ms. Carmen Borg
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Subject: Review of "Transportation and Traffic" Analysis –
Draft Master Environmental Impact Report
General Plan and Development Code Update
City of Fresno, Fresno County, California

Dear Ms. Borg:

As requested, MRO Engineers, Inc., has completed a review of the "Transportation and Traffic" section of the Draft Master Environmental Impact Report (DMEIR) prepared with respect to the proposed General Plan and Development Code Update for the City of Fresno, California. That document was prepared by First Carbon Solutions and published on July 22, 2014. The DMEIR incorporates a traffic and transportation impact analysis prepared by Fehr & Peers (F&P).

This letter report documents the results of our detailed review of the DMEIR "Transportation and Traffic" analysis.

1. ***Deficient Travel Demand Forecasting Model*** – According to page 5.14-27 of the DMEIR:

> *"A modified version of the Fresno COG countywide travel demand forecasting (TDF) model was used to forecast future traffic volume for the City of Fresno General Plan Update. The modifications were specific to the City of Fresno to ensure that the model accurately estimated traffic volumes used in the analysis process . . . Appendix H-5 includes documentation of the transportation modeling and analysis steps including a summary of the model validation."*

Although DMEIR Appendix H-5 contains maps illustrating the boundaries of the model's traffic analysis zones (TAZ) and detailed information concerning the land use inputs for Existing, Existing Plus Project, and Cumulative Conditions, there is no other "documentation of the transportation modeling and analysis steps." As noted, however, there is a summary of the model validation, which is presented in a table entitled, "Fresno COG Traffic Model GIS Validation Results: PM Peak Hour Two-Way Total Traffic Volumes." For ease of reference, that table is presented here as Attachment A.

According to the *Travel Model Validation and Reasonableness Checking Manual – Second Edition* (Federal Highway Administration and Cambridge Systematics, Inc., September 24, 2010, p. 1-4), validation is defined as follows:

> *"Validation is the application of the calibrated models and comparison of the results against observed data."*

Specifically, the "base year" model is run and the traffic volume estimates generated by the model are compared to existing traffic volume data on a link-by-link basis. The question is, how well does the model replicate existing traffic volumes? The theory is that if the model can

accurately predict existing volumes (based on existing land use data and transportation system information), then it will accurately predict future traffic volumes (based on future land use and transportation system projections).

The results of the model validation process are summarized at the bottom of the table presented in Attachment A. Three parameters were used to determine whether the modified Fresno COG countywide model provides valid traffic estimates:

- The percent of road segments "within target deviation,"
- The Percent Root Mean Square Error, and
- The Correlation Coefficient.

For each of those three metrics, a target was established, and the model-generated traffic volume estimates were compared to those targets, with the following results:

- The percent of road segments "within target deviation" was 60 percent, whereas the goal was to exceed 75 percent,
- The "Percent Root Mean Square Error" was 46 percent, while the goal was to be less than 40 percent, and
- The "Correlation Coefficient" was 0.88, which just missed the goal of exceeding 0.88.

Each of these three parameters is discussed below.

Target Deviation

The "target deviations" employed in the model validation process are listed in the table presented in Attachment A; they range from 0.20 to 0.60. These values were derived from a curve presented in the Caltrans *Travel Forecasting* Guidelines (November 1992).

As noted above, the goal of the model validation process was for 75 percent of the links to fall within the allowable deviation. In other words, it was considered acceptable for 25 percent of the links to fall outside that allowable value. In fact, only 60 percent of the links met this target, meaning that a full 40 percent failed to do so. In this case, 199 of the 495 tested links had traffic forecasts that were either excessively high or low, compared to the actual traffic counts.

Of those 199 deficient traffic forecasts, 120 (60 percent) were lower than the corresponding traffic count. Moreover, of the 495 total roadway links, the traffic forecasts at 281 (57 percent) were lower than the actual count. The links at which traffic was underestimated are highlighted in yellow in Attachment A.

Percent Root Mean Square Error

Percent root mean square error, according to the FHWA *Travel Model Validation and Reasonableness Checking Manual* is a:

> *". . . measure of accuracy of the traffic assignment measuring the average error between the observed and modeled traffic volumes on links with traffic counts."*

The modified Fresno COG model validation had a goal for this parameter of less than 40 percent. The actual model validation result was 46 percent, which failed to meet the established goal. Thus, the model validation process determined that the modified Fresno COG model is not sufficiently accurate, which reinforces the results described above with respect to the target deviation.

Correlation Coefficient

Correlation coefficient is a measure of the degree of straight-line or linear association between two variables. A value of 1.00 would indicate a perfect relationship between the two variables. That is, as one variable increases, the other variable increases in a linear fashion. In this case, although the validation results indicate that the model again fell short of the established standard, the shortfall is minimal.

Conclusion

The model validation results for the modified Fresno COG countywide travel demand forecasting model clearly indicate that the model fails to provide accurate forecasts of future traffic – it can't even "predict" existing volumes. As described above, it tends to underestimate traffic. In fact, a number of the roadway links listed in the validation results table had literally no traffic assigned to them.

The use of this deficient tool to estimate study area traffic volumes has substantial ramifications for the environmental analysis. In addition to the likelihood that the underestimated traffic will result in failure to identify significant traffic impacts, it is probable that the air quality, noise, and greenhouse gas analyses are compromised by the defective traffic forecasts.

Clearly, more effort needs to be devoted to the model refinement process, with the goal of creating a travel demand forecasting model that actually provides credible forecasts of travel demand; the modified Fresno COG model used in the DMEIR traffic analysis is woefully inadequate in this regard. Once the model has been improved to the point that it is capable of replicating existing traffic volumes and generating meaningful future traffic projections, the DMEIR traffic analysis needs to be revised and the document needs to be recirculated for further public review.

2. ***Level of Service Calculation Methodology*** – The DMEIR traffic analysis focused on determination of level of service (LOS) for major roadway segments throughout the city. The specific process is described on DMEIR p. 5.14-4:

> *"The LOS was determined by comparing traffic volumes for selected roadway segments with peak hour LOS capacity thresholds. These thresholds are shown in Table 5.14-2 and were calculated based on the methodology contained in the Highway Capacity Manual (HCM) (Transportation Research Board 2000). The HCM methodology is the prevailing measurement standard used throughout the United States."*

Several points are in order with respect to the above statement from the DMEIR.

First, we note that the LOS analysis was based on the year 2000 version of the *Highway Capacity Manual*. This violates the requirement established in the *City of Fresno Traffic*

Impact Study Report Guidelines (City of Fresno, Department of Public Works, Updated February 2, 2009, p. 3), which requires that the:

> *"Most current edition of the Highway Capacity Manual by Transportation Research Board, and MUTCD shall be used."*

The current (year 2010) version of the *Highway Capacity Manual* (HCM 2010) was released on April 11, 2011. It follows previous editions completed in 1965, 1985, 1997, and 2000.

Although it is unclear exactly when the DMEIR traffic analysis was initiated, p. 5.14-4 of the document says that the traffic counts used in the analysis represent year 2012 conditions. Thus, the DMEIR traffic study was initiated at least a year after the current (2010) version of the *Highway Capacity Manual* became widely available. Despite this, the traffic analysis was performed using procedures documented in the superseded (year 2000) version of the *Highway Capacity Manual*, which violates standard City of Fresno procedures.

The second point concerns the DMEIR statement regarding the status of the HCM methodology as the prevailing standard for level of service analysis. This statement (which is true) implies that the HCM method was used in the DMEIR analysis (which is not true).

The DMEIR analysis is a simple volume/capacity (V/C) ratio evaluation. In this case, the volumes represent either the existing (year 2012) traffic volumes or the pertinent traffic forecasts generated by the deficient modified Fresno COG model. Only the estimated capacity thresholds were ostensibly based on HCM methodologies. DMEIR Table 5.14-2 (pages 5.14-7 and 5.14-8) presents a highly detailed set of LOS thresholds for various roadway types. Unfortunately, no information is provided that would illuminate the question of exactly how these thresholds were derived. (For ease of reference, DMEIR Table 5.14-2 is presented here as Attachment B.)

For example, DMEIR Table 5.14-2 provides thresholds for each level of service (LOS A through LOS F) for various numbers of lanes for a variety of roadway types, including freeways. Chapter 11 of the *Highway Capacity Manual* (2010) describes the HCM 2010 analysis procedures for "Basic Freeway Segments." According to that chapter, freeway level of service is defined by density (i.e., the number of passenger cars per mile per lane); neither traffic volume nor volume/capacity ratio is a measure of freeway level of service.

Moreover, under the HCM 2010 methodology, calculation of level of service on a freeway segment requires substantial data input, including the following:

- Free-flow speed (miles/hour),
- Number of mainline freeway lanes,
- Lane width (feet),
- Right-hand lateral clearance (feet),
- Total ramp density (i.e., ramps/mile),
- Terrain (level, rolling, or mountainous or specific grade information),
- Heavy-vehicle (i.e., truck) percentage,

- Peak-hour factor (which describes the uniformity of traffic flow within the peak hour), and
- Driver population (e.g., commuters who are familiar with the route or tourists who are not).

Although we have used freeways as an example to illustrate our point, similar considerations apply to all of the roadway types represented in DMEIR Table 5.14-2.

No information is provided in the DMEIR with regard to the specific input parameters that were used in developing the theoretical thresholds applied in the LOS analysis, whether for freeways or any of the other roadway types presented. Consequently, it is impossible to judge whether the analysis is credible and, moreover, whether the LOS results are valid.

Moreover, we assume (based on the nature of the information presented in DMEIR Table 5.14-2) that the same input assumptions were applied across the entire study area. This ignores the obvious fact that different roadways, or even different sections of a given road, vary somewhat. Lane widths, shoulder widths, truck percentages, and a wide variety of parameters could easily change as one travels down a particular roadway. The generic approach employed in the DMEIR analysis fails to account for these key differences, which raises serious questions as to the validity of the analysis results.

We also note that DMEIR Table 5.14-2 has "holes" where no capacity threshold value has been provided. For example, for "super arterial" roads, values are only shown for LOS D and E; no thresholds are presented for LOS A, B, or C. A footnote to the table might be an attempt to explain this. It says, "LOS is not achievable because of type of facility." Referring again to super arterials, this suggests that it is impossible for a driver to experience LOS A, B, or C. How can this be? If that driver happens to be traveling on one of Fresno's super arterials at a time when traffic is particularly light, will he not experience LOS A, which the DMEIR (p. 5.14-4) defines as:

> *". . . free-flow travel with an excellent level of comfort and convenience and the freedom to maneuver."*

According to DMEIR Table 5.14-2, the best this driver can expect is LOS D, which is defined as:

> *". . . high-density, but stable flow. Users experience severe restrictions in speed and freedom to maneuver, with poor levels of comfort and convenience."*

This simply defies common sense and, more importantly, raises questions as to the technical and philosophical approach to the analysis of roadway level of service. As presented, the LOS analysis for certain roadway types lacks credibility.

The failure to use the latest version of the *Highway Capacity Manual* represents a violation of City of Fresno procedures. To ensure the accuracy of the DMEIR traffic analysis, as well as consistency with City procedures and policies, the level of service calculations must be performed using the current, year 2010 version of the *Highway Capacity Manual*. Also, the specific inputs used to develop LOS thresholds must be revealed and adjusted, as necessary, to reflect the specific link-by-link characteristics of the study area roadways. After the LOS calculations are corrected, the DMEIR will need to be recirculated for further public review.

3. ***Obsolete Traffic Volume Data*** – According to the DMEIR (page 5.14-4):

> *"Traffic counts used for this analysis represent year 2012 conditions."*

Referring to the *City of Fresno Traffic Impact Study Report Guidelines* (p. 7):

> *"Available existing counts can be used if they are less than twelve (12) months old and the counts have not be* [sic] *significantly changed due to more recent development in the vicinity.*

The traffic counts used in the DMEIR are now two years old, which violates the City's standard, as well as accepted practice within the traffic engineering profession. Page 19 of the 2006 Institute of Transportation Engineers (ITE) document, *Transportation Impact Analyses for Site Development*, specifically states that ". . . traffic volume data should generally be no older than 1 year."

Because the traffic volumes represent the most critical input parameter in the level of service calculation process, any inaccuracies in those values directly affect the validity of the level of service results. In short, to the extent that the existing peak-hour traffic volumes are inaccurate, the corresponding level of service results reported in the DMEIR are invalid, and a misleading representation of the environmental setting and plan-related impacts will be provided. Although the document does not specifically say so, it is also likely that the future year traffic volumes were developed based, in part, on the existing traffic volumes. Thus, any shortcomings in the existing conditions data will adversely affect the validity of the future year information, as well.

Updated traffic data must be obtained and all analysis scenarios must be revised using the current traffic volume information. The modified transportation and traffic impact analysis should then be incorporated into a revised DMEIR, which must be recirculated for further public review.

4. ***Failure to Consider the Operational Effects of Truck Traffic*** – The proposed General Plan calls for substantial additional industrial land use, particularly in the south and west Fresno areas. Consequently, the road system in those areas will be called upon to accommodate substantial truck traffic.

As described above, it is impossible to determine what assumption has been incorporated into the analysis with regard to the heavy-vehicle percentage on the study area road system. Moreover, we would point out that the use of a blanket heavy-vehicle percentage for all study area roadways would be inappropriate, as it would fail to account for the relatively high truck percentages that can reasonably be anticipated in south and west Fresno and any other areas where substantial industrial development is proposed.

To ensure that the traffic impact analysis fully accounts for truck traffic, the analysis of each roadway link should incorporate a realistic "heavy vehicle percentage" and an appropriate "passenger-car equivalent" (PCE) factor. These factors can be used to derive adjusted traffic volumes that accurately account for the truck component of the pertinent traffic volume.

The traffic impact analysis incorporated into a recent draft environmental impact report prepared for the City of Irwindale in southern California used the following PCE values

(Reference: Urban Crossroads, *Athens-Irwindale Materials Recovery Facility and Transfer Station Traffic Impact Analysis*, February 27, 2014.):

- Light trucks: PCE = 1.5,
- Medium-duty trucks: PCE = 2.7, and
- Heavy-duty trucks: PCE = 3.7.

Thus, according to the assumptions employed in that analysis, one truck is equivalent to between 1.5 and 3.7 passenger cars, depending upon the specific type of truck. These factors reflect not only the size of the vehicles, but also their operating characteristics, particularly with regard to slower acceleration, longer braking distances, and the need for greater separation between vehicles.

The failure to incorporate appropriate factors reflecting the presence of a substantial number of trucks in the prevailing traffic stream results in unrealistic, overly-optimistic level of service results. The roadway segment level of service analyses must be revised to reflect the existing and anticipated composition of traffic in the study area.

5. ***Failure to Consider the Safety Effects of Truck Traffic*** – As described above, the proposed General Plan proposes substantial additional industrial land use in south and west Fresno, where residential neighborhoods are also common. Consequently, implementation of the proposed plan will add a considerable volume of heavy trucks to the road system in those areas. Despite this, the "Transportation and Traffic" section of the DMEIR includes no discussion or analysis of auto-truck conflicts and the potential safety issues associated with mixing automobile traffic with a considerable amount of heavy-vehicle traffic. This is a substantial deficiency in the DMEIR, given the extent of nearby residential land uses.

6. ***Deficient Safety Analysis*** – DMEIR p. 5.14-15 provides a one-paragraph section labeled "Traffic Safety." That section briefly describes a small number of locations in Fresno having the highest number of vehicular collisions since 2009. This information, which is presented graphically on Exhibit 5.14-5 in Appendix H-12, is based on data presented in the Statewide Integrated Traffic Records System (SWITRS).

   Unfortunately, this information is virtually meaningless, as the number of collisions alone fails to account for the total volume of traffic at any given location. For example, consider two hypothetical locations, both of which were found to have 100 collisions per year. Location A carries 10,000 vehicles per day, while Location B has 100,000 vehicles per day. Based on the analysis presented in the DMEIR, these two locations are equally problematical, despite the fact that one carries ten times more traffic than the other.

   This is, of course, not accurate and is, further, misleading. This example illustrates that it is not simply the number of collisions that matters; it's the rate at which the collisions occur that accurately tells the story. A valid traffic safety analysis will include the development and comparison of accident rates, in terms of collisions per million-vehicle-miles for key roadway segments. The DMEIR, though, provides no such assessment and, therefore, it is impossible to determine whether the accident data indicates an existing safety problem. In addition, the DMEIR contains no evaluation with respect to the potential impacts of implementation of the proposed General plan on traffic safety within the City of Fresno. The DMEIR must be revised

to include a detailed analysis of plan-related safety impacts and to identify needed mitigation measures.

7. ***Failure to Consider Pedestrian and Bicycle System Impacts*** – As noted above, the level of service on the study area road system was derived (DMEIR, p. 5.14-4):

> *". . . based on the methodology contained in the Highway Capacity Manual (HCM) (Transportation Research Board 2000)."*

The DMEIR goes on to say:

> *"It should be noted that this traditional methodology used to analyze the roadway system does not consider the potential impact on walking, bicycling, and transit."*

The analyst appears to be unfamiliar with the current, year 2010 edition of the *Highway Capacity Manual*, which might explain why the roadway LOS values were inappropriately derived using the superseded year 2000 version of that document. In fact, the very first paragraph of the "Foreword" in the current HCM document (p. V1-i) states that:

> *"It is the first* Highway Capacity Manual *to provide an integrated multimodal approach to the analysis and evaluation of urban streets from the points of view of automobile drivers, transit passengers, bicyclists, and pedestrians. This is the first manual to take into account the effects of cars on bicyclists and pedestrians."*

Recognizing the integrated nature of the transportation system, the HCM does not include separate chapters for non-automobile travel modes. Instead, the document states (HCM 2010, p. 1-4.):

> *"Where applicable, pedestrian and bicycle material has been integrated throughout the Volume 3* [Interrupted Flow] *chapters, along with the public transit material specific to multimodal analyses."*

Detailed analysis procedures for the pedestrian, bicycle, and transit modes are presented in HCM 2010 Chapters 16 (Urban Street Facilities) and 17 (Urban Street Segments).

Given the focus of the proposed Fresno General Plan Update on accommodating all travel modes, it is difficult to understand how the non-automobile modes could be so thoroughly dismissed in the DMEIR. The DMEIR acknowledges this modified City perspective with the following statement (DMEIR, p. 5.14-42):

> *"The General Plan Update accepts lower LOS values. This reflects a change in policy for the City of Fresno to acknowledge that transportation planning based solely on roadway LOS . . . is not desirable since it fails to acknowledge other users of the circulation system and other community values."*

Moreover, the specific policies and objectives in the proposed General Plan related to pedestrian, bicycle, and transit facilities are detailed on pages 5.14-85 through 5.14-88 in the DMEIR.

Impact TRANS-6 concerns the potential impacts of the proposed General Plan on these "alternative" travel modes. It is addressed beginning on p. 5.14-85 of the DMEIR. As stated there:

> *"The project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities."*

Although the next several pages of the DMEIR list the policies and objectives that relate to the non-automobile travel modes, no quantitative analysis or qualitative statement is provided to address the potential impacts of the proposed General Plan with regard to the "performance or safety of such facilities." Consequently, there is simply no basis for the DMEIR' s finding of a less-than-significant impact.

The DMEIR ignores factors that could lead to significant operational and safety-related impacts throughout the City as the plan is implemented. At the very minimum, transit users will suffer from the extensive travel delays imposed by a roadway system where LOS E and F are prevalent. Moreover, pedestrians and bicyclists are likely to be exposed to unsafe conditions, as frustrated motorists become impatient and make poor decisions leading to red light running, failure to yield to pedestrians in crosswalks, or using road shoulders and bike lanes as added travel or turn lanes.

Given the importance of non-automotive travel within the proposed plan, it is essential that the DMEIR include a meaningful analysis of the plan's impacts on those alternative modes. Such an analysis is absent from the current document. Upon completion of the analysis, the DMEIR must be revised and recirculated for further public review.

8. ***Vehicle Miles Traveled Calculation*** – DMEIR Table 5.14-3 presents estimates of vehicle miles traveled (VMT) for the three analysis scenarios addressed in the traffic study: Existing Conditions, Existing Plus General Plan Buildout, and Cumulative Plus General Plan Buildout.

   Addition of General Plan Buildout to existing conditions is projected to increase the daily VMT by almost 8,950,000 vehicle-miles, an increase of 95 percent. Under cumulative conditions, total VMT is projected to increase by over 111 percent (i.e., 10,487,655 vehicle-miles) compared to existing conditions.

   Unfortunately, these values were derived through a "black box" process using the modified Fresno COG Countywide Travel Demand Forecasting Model, and no detail is provided to assist the reader in understanding the factors that were key in developing these estimates or, more importantly, to judge whether the estimates are credible. Because the VMT values are key inputs to the air quality and greenhouse gas analyses, it is important to ensure the validity of these values. (Of course, as described earlier, the ability of the Fresno COG model to provide meaningful estimates of future travel (including future VMT estimates) is highly questionable.)

   We note that California in September 2013 enacted Senate Bill 743 (SB 743), which will eventually eliminate level of service as a determinant of significant effects in documents prepared under the California Environmental Quality Act (CEQA), such as the DMEIR. In other words, vehicular delay will no longer be considered an environmental impact under CEQA. Instead, VMT will be the primary measure of transportation impacts. Although

debatable, this is ostensibly intended to better reflect the multi-modal nature of the transportation system, particularly with regard to pedestrians, bicyclists, and transit users.

Although no local or statewide thresholds have been established with regard to what constitutes a significant impact concerning increases in vehicle miles traveled, it is disappointing that the DMEIR would dismiss a 111 percent increase in VMT as insignificant.

9. ***At-Grade Railroad Crossing Safety*** – As described on DMEIR pages 5.14-17 and 5.14-18, Fresno is served by two railroad corridors. The Burlington Northern Santa Fe (BNSF) corridor runs through "the middle of downtown" and the Union Pacific (UP) corridor runs parallel to State Route 99 (SR 99). Moreover, ". . . about 50 freight trains pass through the two rail corridors daily as they travel through Downtown."

   Each of these rail lines has numerous at-grade crossings of local streets and, further, each of those locations represents a potentially hazardous condition. As traffic increases in Fresno in accordance with the General Plan Update land use plan, the likelihood of conflicts between automobiles and trains will also increase. Despite this, the DMEIR fails to address safety-related issues associated with at-grade rail crossings. This is a substantial deficiency that must be corrected.

10. ***Emergency Access*** – Impact TRANS-5 (DMEIR, p. 5.14-83) addresses whether the proposed plan would result in inadequate emergency access, and concludes that the General Plan Update would have a less-than-significant impact. This conclusion was based largely on a review of the proposed General Plan policies and objectives that might "provide adequate emergency access." We note that the potential role of certain of these policies in providing adequate emergency access is questionable. For example, it is unclear how Policy LU-1-g has any effect on emergency access: "Maintain the City's current SOI boundaries without additional expansion . . ." Since the SOI boundary is nothing more than a line on a map, we fail to see any effect whatsoever with respect to emergency access.

    The DMEIR discussion of the emergency access issue includes the following statement:

    > *"Implementation of the City of Fresno General Plan Update would increase the amount of vehicle traffic, which would require the improvement and expansion of the City of Fresno's roadway system . . . to accommodate forecasts* [sic] *travel demand as well as maintaining acceptable traffic operations (LOS) in the City (see Impact TRANS-1). An enhanced roadway network that accommodates forecasted travel demand would also provide adequate emergency access."*

    There are several problems with this statement. First, while it is certainly true that implementation of the proposed plan will increase the amount of vehicle traffic (as noted earlier, the plan will more than double daily vehicle miles traveled), there is no certainty regarding the "improvement and expansion of the City of Fresno's roadway system." Road construction is dependent upon the availability of funding (among other factors) and it is not certain whether adequate funding will be available in coming years to keep up with needs.

    Second, it is also true that, "[a]n enhanced roadway network that accommodates forecasted travel demand would also provide adequate emergency access." Unfortunately, as demonstrated in the DMEIR, the City's road system will not, in many cases, accommodate the forecasted traffic demand. For example, the level of service standard for the entire Downtown

Planning Area (designated as Traffic Impact Zone I or TIZ-I) is LOS F. Similarly, roadway segments within TIZ-II ("areas of the City currently built-up and wanting to encourage infill development") and TIZ-III ("areas near or outside the City limits but within the SOI") that the DMEIR has identified as operating at LOS F are "grandfathered in" and will be allowed to continue to operate at LOS F.

By definition, roads that are projected to operate at LOS F will not accommodate forecasted traffic demand. Referring to the level of service definitions provided on DMEIR p. 5.14-4:

> *"LOS F is used to define forced or breakdown conditions. This condition exists wherever the volume of traffic exceeds the capacity of the roadway. Long queues can form behind these bottleneck points with queued traffic traveling in a stop-and-go fashion."*

Clearly, such roads will not provide adequate emergency access. The simple fact is that roads that are at LOS F will be clogged with traffic, which will impede the ability of emergency vehicles to respond to calls. A recent (September 2 and 3, 2014) feature on the NBC *Nightly News* addressed the issue of delays in emergency response due to traffic congestion. According to that report, research has indicated a ten percent increase in deaths for every minute of delay in emergency response time. Further, a 2012 study in Utah found an eight percent increase in fatalities within the 24-hour period following a delayed emergency response.

Traffic delays caused by planned congestion associated with the proposed General Plan Update will, very simply, result in additional fatalities among the citizens of Fresno, particularly in the areas of the City where LOS F will be allowed by General Plan policies. This is a significant impact, which was ignored in the DMEIR.

CONCLUSION

Our review of the "Transportation and Traffic" section of the Draft Master Environmental Impact Report for the proposed City of Fresno General Plan Update revealed several issues that affect the validity of the conclusions presented in that document. These issues should be addressed prior to City of Fresno approval of the proposed plan and the associated environmental documentation.

Among other considerations, we find it ironic that the City of Fresno has developed a General Plan Update that:

- Explicitly encourages and addresses the needs of non-automobile travel through an extensive set of policies and objectives, while
- Performing absolutely no analysis to determine whether the proposed plan will have adverse operational or safety impacts on pedestrians, bicyclists, and transit users, and
- Determines that implementation of the proposed General Plan Update will have no significant traffic impacts, even though roads throughout the City will operate at LOS E and F, while also
- Determining that VMT in the City will more than double as a result of plan implementation, but still

- Maintaining that the proposed plan will have no significant transportation impacts requiring mitigation.

As described above, the DMEIR "Transportation and Traffic" analysis has substantial deficiencies and, further, has failed to identify a number of significant impacts,

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact us at (916) 783-3838.

Sincerely,

MRO ENGINEERS, INC.

Neal K. Liddicoat, P.E.
Traffic Engineering Manager

ATTACHMENT A

Fresno COG Traffic Model GIS Validation Results:
PM Peak Two-Way Total Traffic Volumes

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes													
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
1	A	N/O	STANISLAUS	5186	5190	05186-05190	160	183	0.87	0.60	Yes	-23	529
2	ABBY	S/O	180	4404	2040	04404-02040	983	290	3.39	0.60	No	693	480,249
3	ABBY	N/O	DIVISADERO	2093	2092	02093-02092	1,055	371	2.84	0.60	No	684	467,856
4	ABBY	S/O	OLIVE	2087	2086	02087-02086	908	854	1.06	0.60	Yes	54	2,916
5	AIRWAYS	W/O	CLOVIS	2540	8220	02540-08220	1,338	1,135	1.18	0.35	Yes	203	41,209
6	ALLUVIAL	E/O	CEDAR	3093	3105	03093-03105	483	912	0.53	0.60	Yes	-429	184,041
7	ALLUVIAL	E/O	CHESTNUT	3100	3110	03100-03110	130	1,013	0.13	0.37	No	-883	779,689
8	ALLUVIAL	E/O	INGRAM	6540	6542	06540-06542	739	840	0.88	0.60	Yes	-101	10,201
9	ALLUVIAL	E/O	MAPLE	3096	3108	03096-03108	350	1,020	0.34	0.37	No	-670	448,900
10	ALLUVIAL	E/O	MARKS	3165	5047	03165-05047	97	162	0.60	0.60	Yes	-65	4,225
11	ALLUVIAL	W/O	MILBURN	5784	5791	05784-05791	790	436	1.81	0.60	No	354	125,316
12	ALLUVIAL	E/O	VAN NESS	3166	5048	03166-05048	8	104	0.08	0.60	No	-96	9,216
13	ALLUVIAL	E/O	WEST	3168	5049	03168-05049	1	53	0.02	0.60	No	-52	2,704
14	ANNADALE	E/O	CEDAR	8434	9236	08434-09236	0	66	0.00	0.60	No	-66	4,356
15	ANNADALE	W/O	ELM	2134	2779	02134-02779	307	206	1.49	0.60	Yes	101	10,201
16	ANNADALE	W/O	MARTIN LUTHER KING JR	2914	2934	02914-02934	17	19	0.89	0.60	Yes	-2	4
17	ANNADALE	W/O	WALNUT	2934	3036	02934-03036	0	9	0.00	0.60	No	-9	81
18	ARMSTRONG	N/O	BELMONT	3559	12146	03559-12146	294	239	1.23	0.60	Yes	55	3,025
19	ARMSTRONG	N/O	BUTLER	5627	6684	05627-06684	16	118	0.14	0.60	No	-102	10,404
20	ARMSTRONG	S/O	CHURCH	6685	12142	06685-12142	11	121	0.09	0.60	No	-110	12,100
21	ARMSTRONG	S/O	DAKOTA	5021	8378	05021-08378	118	360	0.33	0.60	No	-242	58,564
22	ARMSTRONG	S/O	KINGS CANYON	3560	6684	03560-06684	15	252	0.06	0.60	No	-237	56,169
23	ASHLAN	W/O	41	3128	4336	03128-04336	2,411	2,210	1.09	0.27	Yes	201	40,401
24	ASHLAN	E/O	BLACKSTONE	2077	3128	02077-03128	1,911	2,312	0.83	0.27	Yes	-401	160,801
25	ASHLAN	W/O	BRYAN	3330	5072	03330-05072	138	155	0.89	0.60	Yes	-17	289
26	ASHLAN	E/O	CEDAR	2450	2451	02450-02451	2,522	2,091	1.21	0.28	Yes	431	185,761
27	ASHLAN	E/O	CHESTNUT	5034	6812	05034-06812	1,425	1,863	0.76	0.29	Yes	-438	191,844
28	ASHLAN	E/O	DEL MAR	2077	2444	02077-02444	1,171	1,598	0.73	0.31	Yes	-427	182,329
29	ASHLAN	E/O	FRESNO	2445	2446	02445-02446	1,850	1,805	1.02	0.29	Yes	45	2,025
30	ASHLAN	W/O	FRUIT	2440	5428	02440-05428	1,611	1,375	1.17	0.32	Yes	236	55,696
31	ASHLAN	W/O	HAYES	3330	5072	03330-05072	138	208	0.66	0.60	Yes	-70	4,900
32	ASHLAN	E/O	MILLBROOK	2449	5007	02449-05007	1,960	1,931	1.02	0.28	Yes	29	841
33	ASHLAN	W/O	SANTA FE	2440	5428	02440-05428	1,611	1,359	1.19	0.32	Yes	252	63,504
34	ASHLAN	E/O	WEBER	3119	5084	03119-05084	3,093	3,111	0.99	0.25	Yes	-18	324
35	ASHLAN	W/O	WEST	2438	5431	02438-05431	1,801	1,495	1.20	0.31	Yes	306	93,636
36	ASHLAN	W/O	WINERY	5034	6288	05034-06288	1,425	2,657	0.54	0.26	No	-1,232	1,517,824
37	AUDUBON	E/O	BLACKSTONE	3173	3174	03173-03174	729	1,465	0.50	0.31	No	-736	541,696
38	AUDUBON	N/O	COLE	3175	3176	03175-03176	772	1,028	0.75	0.37	Yes	-256	65,536
39	AUDUBON	W/O	DEL MAR	2060	12117	02060-12117	434	1,237	0.35	0.33	No	-803	644,809
40	AUDUBON	W/O	FRIANT	3173	5584	03173-05584	575	1,519	0.38	0.31	No	-944	891,136
41	AUDUBON	N/O	LEXINGTON	3272	3274	03272-03274	499	1,244	0.40	0.33	No	-745	555,025
42	AUDUBON	N/O	NEES	3272	6560	03272-06560	437	1,126	0.39	0.35	No	-689	474,721
43	B	N/O	STANISLAUS	3493	4438	03493-04438	214	213	1.00	0.60	Yes	1	1
44	B	N/O	TUOLUMNE	2180	3493	02180-03493	94	180	0.52	0.60	Yes	-86	7,396
45	BARSTOW	E/O	BLACKSTONE	2072	2347	02072-02347	1,660	1,542	1.08	0.31	Yes	118	13,924
46	BARSTOW	E/O	BRAWLEY	2337	3562	02337-03562	33	354	0.09	0.60	No	-321	103,041
47	BARSTOW	E/O	CEDAR	2354	12314	02354-12314	1,569	1,073	1.46	0.36	No	496	246,016
48	BARSTOW	W/O	CEDAR	2354	5442	02354-05442	1,451	987	1.47	0.60	Yes	464	215,296
49	BARSTOW	E/O	FRUIT	2342	2343	02342-02343	358	1,009	0.35	0.37	No	-651	423,801
50	BARSTOW	E/O	GRANTLAND	3295	6744	03295-06744	32	79	0.41	0.60	Yes	-47	2,209
51	BARSTOW	E/O	PALM	2311	2344	02311-02344	684	903	0.76	0.60	Yes	-219	47,961
52	BARSTOW	E/O	THORNE	2344	3195	02344-03195	358	1,084	0.33	0.36	No	-726	527,076
53	BARSTOW	W/O	VALENTINE	3562	3563	03562-03563	30	133	0.23	0.60	No	-103	10,609
54	BARSTOW	E/O	WEST	2341	3194	02341-03194	156	770	0.20	0.60	No	-614	376,996
55	BEHYMER	E/O	CHANCE	5513	5517	05513-05517	16	427	0.04	0.60	No	-411	168,921
56	BEHYMER	E/O	MAPLE	5513	6648	05513-06648	474	332	1.43	0.60	Yes	142	20,164
57	BEHYMER	W/O	MAPLE	5513	5517	05513-05517	16	378	0.04	0.60	No	-362	131,044
58	BELMONT	W/O	99	4368	4369	04368-04369	428	420	1.02	0.60	Yes	8	64
59	BELMONT	E/O	ABBY	2090	2728	02090-02728	809	573	1.41	0.60	Yes	236	55,696
60	BELMONT	W/O	BLACKSTONE	4402	4403	04402-04403	530	168	3.15	0.60	No	362	131,044
61	BELMONT	E/O	CEDAR	2737	2738	02737-02738	1,167	1,070	1.09	0.36	Yes	97	9,409
62	BELMONT	W/O	CHESTNUT	2741	2742	02741-02742	698	884	0.79	0.60	Yes	-186	34,596
63	BELMONT	W/O	CLOVIS	2746	2747	02746-02747	289	534	0.54	0.60	Yes	-245	60,025
64	BELMONT	E/O	FIRST	2733	2734	02733-02734	762	1,388	0.55	0.32	No	-626	391,876
65	BELMONT	W/O	FRESNO	2729	2730	02729-02730	771	659	1.17	0.60	Yes	112	12,544
66	BELMONT	W/O	FULTON	4382	5178	04382-05178	1,031	878	1.17	0.60	Yes	153	23,409
67	BELMONT	W/O	H	2723	6650	02723-06650	651	634	1.03	0.60	Yes	17	289
68	BELMONT	W/O	MAPLE	2739	2740	02739-02740	923	1,160	0.80	0.34	Yes	-237	56,169
69	BELMONT	W/O	MARKS	3363	3473	03363-03473	179	409	0.44	0.60	Yes	-230	52,900
70	BELMONT	W/O	PEACH	2745	5505	02745-05505	442	904	0.49	0.60	Yes	-462	213,444
71	BLACKSTONE	N/O	ALLUVIAL	6539	9180	06539-09180	2,657	2,821	0.94	0.26	Yes	-164	26,896
72	BLACKSTONE	N/O	BREMER	5438	4400	05438-04400	802	685	1.17	0.60	Yes	117	13,689
73	BLACKSTONE	N/O	BULLARD	2071	2130	02071-02130	2,566	1,259	2.04	0.33	No	1,307	1,708,249
74	BLACKSTONE	N/O	CLINTON	2082	3253	02082-03253	1,789	1,177	1.52	0.34	No	612	374,544
75	BLACKSTONE	S/O	DAKOTA	2078	2079	02078-02079	1,632	835	1.95	0.60	No	797	635,209
76	BLACKSTONE	N/O	DIVISADERO	4413	4412	04413-04412	479	421	1.14	0.60	Yes	58	3,364
77	BLACKSTONE	N/O	GETTYSBURG	2075	2076	02075-02076	1,953	1,098	1.78	0.36	No	855	731,025
78	BLACKSTONE	S/O	HERNDON	2068	3223	02068-03223	2,225	968	2.30	0.60	No	1,257	1,580,049
79	BLACKSTONE	S/O	OLIVE	2086	4361	02086-04361	491	637	0.77	0.60	Yes	-146	21,316
80	BLACKSTONE	N/O	SHAW	2073	2074	02073-02074	1,942	1,241	1.56	0.33	No	701	491,401

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
81	BLACKSTONE	N/O	SHIELDS	2079	2080	02079-02080	1,877	835	2.25	0.60	No	1,042	1,085,764
82	BLACKSTONE	N/O	SIERRA	2069	3223	02069-03223	2,285	605	3.78	0.60	No	1,680	2,822,400
83	BRAWLEY	N/O	BARSTOW	2337	5487	02337-05487	1,249	1,798	0.69	0.30	No	-549	301,401
84	BRAWLEY	S/O	CALIFORNIA	5136	8062	05136-08062	104	106	0.98	0.60	Yes	-2	4
85	BRAWLEY	N/O	CLINTON	2562	3429	02562-03429	213	860	0.25	0.60	No	-647	418,609
86	BRAWLEY	N/O	DAKOTA	3339	3340	03339-03340	579	537	1.08	0.60	Yes	42	1,764
87	BRAWLEY	N/O	GETTYSBURG	3118	3585	03118-03585	1,290	1,218	1.06	0.33	Yes	72	5,184
88	BRAWLEY	S/O	HERNDON	3281	5107	03281-05107	1,280	793	1.61	0.60	No	487	237,169
89	BRAWLEY	N/O	NIELSEN	5120	5440	05120-05440	152	384	0.40	0.60	No	-232	53,824
90	BRAWLEY	N/O	SHAW	2374	3571	02374-03571	1,436	3,053	0.47	0.25	No	-1,617	2,614,689
91	BRAWLEY	N/O	WEBER	3118	3585	03118-03585	1,290	608	2.12	0.60	No	682	465,124
92	BROADWAY	N/O	41	6145	6187	06145-06187	436	522	0.84	0.60	Yes	-86	7,396
93	BROADWAY	N/O	DIVISADERO	4385	5400	04385-05400	186	87	2.14	0.60	No	99	9,801
94	BROADWAY	N/O	FRESNO	9226	9227	09226-09227	297	202	1.47	0.60	Yes	95	9,025
95	BROADWAY	S/O	VENTURA	4457	5222	04457-05222	25	238	0.11	0.60	No	-213	45,369
96	BRYAN	S/O	ASHLAN	3326	5632	03326-05632	162	62	2.61	0.60	No	100	10,000
97	BULLARD	E/O	41	3675	4327	03675-04327	2,646	2,601	1.02	0.26	Yes	45	2,025
98	BULLARD	W/O	BLACKSTONE	2071	3126	02071-03126	2,177	1,983	1.10	0.28	Yes	194	37,636
99	BULLARD	E/O	CARNEGIE	5806	5808	05806-05808	292	808	0.36	0.60	No	-516	266,256
100	BULLARD	E/O	CEDAR	2316	5001	02316-05001	1,850	2,114	0.88	0.27	Yes	-264	69,696
101	BULLARD	W/O	CEDAR	2313	2314	02313-02314	2,006	2,055	0.98	0.28	Yes	-49	2,401
102	BULLARD	W/O	CHESTNUT	2316	5001	02316-05001	1,850	2,029	0.91	0.28	Yes	-179	32,041
103	BULLARD	W/O	FIRST	2309	3245	02309-03245	2,044	2,467	0.83	0.26	Yes	-423	178,929
104	BULLARD	W/O	FRESNO	3675	4327	03675-04327	2,646	2,563	1.03	0.26	Yes	83	6,889
105	BULLARD	E/O	GRANTLAND	2294	6740	02294-06740	14	104	0.13	0.60	No	-90	8,100
106	BULLARD	W/O	JEANNE	3291	5052	03291-05052	34	91	0.37	0.60	No	-57	3,249
107	BULLARD	W/O	MAPLE	2316	5001	02316-05001	1,850	1,900	0.97	0.28	Yes	-50	2,500
108	BULLARD	E/O	MAROA	2306	3126	02306-03126	2,350	2,328	1.01	0.27	Yes	22	484
109	BULLARD	W/O	MILLBROOK	2312	3244	02312-03244	2,084	2,514	0.83	0.26	Yes	-430	184,900
110	BULLARD	W/O	PALM	2303	3201	02303-03201	2,230	1,869	1.19	0.29	Yes	361	130,321
111	BULLARD	E/O	VALENTINE	6062	12301	06062-12301	40	358	0.11	0.60	No	-318	101,124
112	BULLARD	E/O	WEST	2301	3193	02301-03193	1,940	1,668	1.16	0.30	Yes	272	73,984
113	BUTLER	E/O	ARMSTRONG	2850	5627	02850-05627	24	16	1.50	0.60	Yes	8	64
114	BUTLER	E/O	CHESTNUT	2842	2843	02842-02843	661	684	0.97	0.60	Yes	-23	529
115	BUTLER	W/O	CLOVIS	2846	2847	02846-02847	157	410	0.38	0.60	No	-253	64,009
116	CALAVERAS	E/O	N	3008	6084	03008-06084	213	148	1.44	0.60	Yes	65	4,225
117	CALIFORNIA	E/O	BRAWLEY	3068	3113	03068-03113	15	95	0.16	0.60	No	-80	6,400
118	CALIFORNIA	W/O	CEDAR	2879	3505	02879-03505	148	88	1.68	0.60	No	60	3,600
119	CALIFORNIA	E/O	CHERRY	5405	6188	05405-06188	11	59	0.19	0.60	No	-48	2,304
120	CALIFORNIA	E/O	MARKS	2863	2966	02863-02966	94	154	0.61	0.60	Yes	-60	3,600
121	CALIFORNIA	E/O	ORANGE	2878	3505	02878-03505	203	127	1.60	0.60	Yes	76	5,776
122	CALIFORNIA	W/O	TUPMAN	2872	6089	02872-06089	409	455	0.90	0.60	Yes	-46	2,116
123	CALIFORNIA	W/O	WALNUT	3586	6750	03586-06750	185	304	0.61	0.60	Yes	-119	14,161
124	CALIFORNIA	E/O	WEST	2865	2866	02865-02866	58	496	0.12	0.60	No	-438	191,844
125	CECELIA	N/O	BULLARD	2929	5411	02929-05411	1,388	468	2.97	0.60	No	920	846,400
126	CEDAR	N/O	BULLDOG	2354	3129	02354-03129	1,693	2,100	0.81	0.27	Yes	-407	165,649
127	CEDAR	S/O	CALIFORNIA	2879	3146	02879-03146	528	605	0.87	0.60	Yes	-77	5,929
128	CEDAR	N/O	CENTRAL	2962	12353	02962-12353	98	126	0.78	0.60	Yes	-28	784
129	CEDAR	S/O	CENTRAL	5169	8106	05169-08106	105	129	0.81	0.60	Yes	-24	576
130	CEDAR	N/O	CHURCH	2897	3146	02897-03146	461	714	0.65	0.60	Yes	-253	64,009
131	CEDAR	N/O	CLINTON	2557	2586	02557-02586	1,315	941	1.40	0.60	Yes	374	139,876
132	CEDAR	N/O	COPPER	3053	12318	03053-12318	283	80	3.54	0.60	No	203	41,209
133	CEDAR	S/O	DAKOTA	2491	2508	02491-02508	938	1,450	0.65	0.31	No	-512	262,144
134	CEDAR	S/O	HERNDON	2252	2283	02252-02283	1,962	1,686	1.16	0.30	Yes	276	76,176
135	CEDAR	N/O	JENSEN	3150	4614	03150-04614	401	417	0.96	0.60	Yes	-16	256
136	CEDAR	S/O	MCKINLEY	2634	2651	02634-02651	1,684	1,611	1.05	0.30	Yes	73	5,329
137	CEDAR	N/O	NEES	2230	3112	02230-03112	879	1,839	0.48	0.29	No	-960	921,600
138	CEDAR	N/O	NORTH	2952	5296	02952-05296	225	387	0.58	0.60	Yes	-162	26,244
139	CEDAR	S/O	PARKWAY	2962	3693	02962-03693	114	148	0.77	0.60	Yes	-34	1,156
140	CEDAR	S/O	SHAW	2140	2399	02140-02399	1,836	1,401	1.31	0.31	No	435	189,225
141	CEDAR	S/O	SHEPHERD	2222	3067	02222-03067	422	1,716	0.25	0.30	No	-1,294	1,674,436
142	CEDAR	N/O	TEAGUE	3067	3161	03067-03161	630	1,685	0.37	0.30	No	-1,055	1,113,025
143	CEDAR	N/O	TULARE	2767	2787	02767-02787	761	1,322	0.58	0.32	No	-561	314,721
144	CEDAR	N/O	VENTURA	2189	2813	02189-02813	893	1,390	0.64	0.32	No	-497	247,009
145	CENTRAL	W/O	MAPLE	5176	6202	05176-06202	89	136	0.65	0.60	Yes	-47	2,209
146	CHAMPLAIN	E/O	FRIANT	3305	5464	03305-05464	5	386	0.01	0.60	No	-381	145,161
147	CHERRY	N/O	ANNADALE	2938	5177	02938-05177	508	256	1.98	0.60	No	252	63,504
148	CHESTNUT	S/O	BELMONT	2742	3545	02742-03545	2,223	2,173	1.02	0.27	Yes	50	2,500
149	CHESTNUT	S/O	BUTLER	2842	2856	02842-02856	1,197	743	1.61	0.60	No	454	206,116
150	CHESTNUT	S/O	CALIFORNIA	2856	5278	02856-05278	1,474	1,429	1.03	0.31	Yes	45	2,025
151	CHESTNUT	S/O	CHURCH	2900	3541	02900-03541	1,096	921	1.19	0.60	Yes	175	30,625
152	CHESTNUT	N/O	HERNDON	2253	6107	02253-06107	1,414	505	2.80	0.60	No	909	826,281
153	CHESTNUT	S/O	JENSEN	2927	5291	02927-05291	1,197	1,126	1.06	0.35	Yes	71	5,041
154	CHESTNUT	N/O	NEES	2231	4996	02231-04996	1,055	887	1.19	0.60	Yes	168	28,224
155	CHESTNUT	N/O	OLIVE	2653	2687	02653-02687	2,028	1,332	1.52	0.32	No	696	484,416
156	CHESTNUT	N/O	SHIELDS	2539	5011	02539-05011	1,749	1,204	1.45	0.33	No	545	297,025
157	CHESTNUT	N/O	TEAGUE	3071	5467	03071-05467	845	978	0.86	0.60	Yes	-133	17,689
158	CHURCH	E/O	ARMSTRONG	3317	3557	03317-03557	11	32	0.34	0.60	No	-21	441
159	CHURCH	E/O	BLYTHE	4263	4407	04263-04407	11	34	0.32	0.60	No	-23	529
160	CHURCH	E/O	CHESTNUT	3239	5277	03239-05277	132	323	0.41	0.60	Yes	-191	36,481

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
161	CHURCH	E/O	ELM	2108	5729	02108-05729	225	342	0.66	0.60	Yes	-117	13,689
162	CHURCH	E/O	FOWLER	3317	3557	03317-03557	11	94	0.12	0.60	No	-83	6,889
163	CHURCH	W/O	FRUIT	2885	2992	02885-02992	23	120	0.19	0.60	No	-97	9,409
164	CHURCH	E/O	PEACH	6527	8264	06527-08264	0	157	0.00	0.60	No	-157	24,649
165	CHURCH	W/O	PEACH	2901	3533	02901-03533	137	236	0.58	0.60	Yes	-99	9,801
166	CLINTON	E/O	ANGUS	2580	2581	02580-02581	1,315	1,048	1.25	0.37	Yes	267	71,289
167	CLINTON	E/O	BLACKSTONE	2082	2577	02082-02577	1,552	1,245	1.25	0.33	Yes	307	94,249
168	CLINTON	E/O	CEDAR	2586	5710	02586-05710	851	840	1.01	0.60	Yes	11	121
169	CLINTON	E/O	FIRST	2581	2582	02581-02582	1,258	1,095	1.15	0.36	Yes	163	26,569
170	CLINTON	E/O	FOWLER	12148	12154	12148-12154	57	180	0.32	0.60	No	-123	15,129
171	CLINTON	E/O	FRUIT	2571	2572	02571-02572	1,425	1,467	0.97	0.31	Yes	-42	1,764
172	CLINTON	E/O	MARKS	2564	2565	02564-02565	1,790	1,793	1.00	0.30	Yes	-3	9
173	CLINTON	N/O	MCKINLEY	5783	6119	05783-06119	577	571	1.01	0.60	Yes	6	36
174	CLINTON	E/O	SUNNYSIDE	6633	8228	06633-08228	629	293	2.15	0.60	No	336	112,896
175	CLINTON	E/O	TEMPERANCE	12148	12154	12148-12154	57	69	0.83	0.60	Yes	-12	144
176	CLINTON	W/O	WEST	2568	2569	02568-02569	1,588	1,735	0.92	0.30	Yes	-147	21,609
177	CLOVIS	S/O	CALIFORNIA	3316	5591	03316-05591	1,315	915	1.44	0.60	Yes	400	160,000
178	CLOVIS	N/O	CLINTON	2541	5394	02541-05394	2,308	1,991	1.16	0.28	Yes	317	100,489
179	CLOVIS	S/O	KINGS CANYON	2199	2822	02199-02822	1,357	2,169	0.63	0.27	No	-812	659,344
180	CLOVIS	N/O	MCKINLEY	6631	8232	06631-08232	4,071	2,360	1.73	0.27	No	1,711	2,927,521
181	CLOVIS	N/O	TULARE	3547	7051	03547-07051	2,813	2,331	1.21	0.27	Yes	482	232,324
182	COLE	E/O	AUDUBON	3176	3208	03176-03208	483	423	1.14	0.60	Yes	60	3,600
183	COPPER	E/O	CEDAR	5773	3053	05773-03053	673	603	1.12	0.60	Yes	70	4,900
184	CORNELIA	N/O	DAKOTA	2472	3410	02472-03410	123	803	0.15	0.60	No	-680	462,400
185	DAKOTA	E/O	BLACKSTONE	2078	2485	02078-02485	335	1,032	0.32	0.37	No	-697	485,809
186	DAKOTA	E/O	CEDAR	2492	5708	02492-05708	763	843	0.91	0.60	Yes	-80	6,400
187	DAKOTA	E/O	CHESTNUT	2495	5015	02495-05015	321	976	0.33	0.60	No	-655	429,025
188	DAKOTA	E/O	FOWLER	5016	12157	05016-12157	24	120	0.20	0.60	No	-96	9,216
189	DAKOTA	E/O	MAPLE	2493	2494	02493-02494	510	953	0.54	0.60	Yes	-443	196,249
190	DAKOTA	W/O	MAPLE	2493	5713	02493-05713	707	1,263	0.56	0.33	No	-556	309,136
191	DAKOTA	W/O	PEACH	2495	5015	02495-05015	321	806	0.40	0.60	No	-485	235,225
193	DAKOTA	E/O	WEST	2478	2479	02478-02479	576	574	1.00	0.60	Yes	2	4
194	DIVISADERO	W/O	41	4637	6180	04637-06180	1,771	1,757	1.01	0.30	Yes	14	196
195	DIVISADERO	E/O	FRESNO	2781	5263	02781-05263	1,839	1,475	1.25	0.31	Yes	364	132,496
196	DIVISADERO	E/O	VAN NESS	2778	5237	02778-05237	227	520	0.44	0.60	Yes	-293	85,849
197	E	N/O	STANISLAUS	5413	5501	05413-05501	49	604	0.08	0.60	No	-555	308,025
198	EAST	S/O	CALIFORNIA	2876	2884	02876-02884	281	255	1.10	0.60	Yes	26	676
199	EL DORADO	E/O	E	3489	5413	03489-05413	246	359	0.69	0.60	Yes	-113	12,769
200	EMERSON	W/O	WEST	3214	12297	03214-12297	359	367	0.98	0.60	Yes	-8	64
201	F	N/O	FRESNO	5418	5500	05418-05500	35	101	0.35	0.60	No	-66	4,356
202	FIG	S/O	NORTH	2946	8094	02946-08094	39	189	0.21	0.60	No	-150	22,500
203	FIGARDEN	E/O	BRAWLEY	4628	5060	04628-05060	790	380	2.08	0.60	No	410	168,100
206	FIRST	N/O	ALLUVIAL	3087	3088	03087-03088	846	938	0.90	0.60	Yes	-92	8,464
207	FIRST	N/O	BARSTOW	2351	5006	02351-05006	746	1,742	0.43	0.30	No	-996	992,016
208	FIRST	N/O	BULLARD	2309	2310	02309-02310	1,205	1,654	0.73	0.30	Yes	-449	201,601
209	FIRST	N/O	CLINTON	2555	2581	02555-02581	1,710	1,063	1.61	0.36	No	647	418,609
210	FIRST	N/O	DAKOTA	2467	2488	02467-02488	1,361	899	1.51	0.60	Yes	462	213,444
211	FIRST	N/O	GETTYSBURG	2411	3234	02411-03234	1,454	1,688	0.86	0.30	Yes	-234	54,756
212	FIRST	N/O	HERNDON	2250	6102	02250-06102	1,220	1,029	1.19	0.37	Yes	191	36,481
213	FIRST	N/O	MCKINLEY	2602	2630	02602-02630	1,633	1,261	1.30	0.33	Yes	372	138,384
214	FIRST	N/O	NEES	3073	3178	03073-03178	601	1,145	0.52	0.35	No	-544	295,936
215	FIRST	N/O	SAN JOSE	2351	2364	02351-02364	990	1,626	0.61	0.30	No	-636	404,496
216	FIRST	S/O	SHAW	2138	2397	02138-02397	959	1,806	0.53	0.29	No	-847	717,409
217	FIRST	N/O	SIERRA	2281	5471	02281-05471	1,072	1,879	0.57	0.29	No	-807	651,249
218	FIRST	N/O	TULARE	2764	2783	02764-02783	1,037	896	1.16	0.60	Yes	141	19,881
219	FOWLER	N/O	CHURCH	5304	5592	05304-05592	196	369	0.53	0.60	Yes	-173	29,929
220	FOWLER	N/O	CLINTON	2593	8462	02593-08462	906	376	2.41	0.60	No	530	280,900
221	FOWLER	S/O	CLINTON	6839	8238	06839-08238	926	487	1.90	0.60	No	439	192,721
222	FOWLER	S/O	CLINTON	6839	8238	06839-08238	926	526	1.76	0.60	No	400	160,000
223	FOWLER	S/O	CLINTON	6839	8238	06839-08238	926	400	2.32	0.60	No	526	276,676
224	FOWLER	N/O	DAKOTA	5016	8376	05016-08376	953	1,187	0.80	0.34	Yes	-234	54,756
225	FOWLER	N/O	JENSEN	2906	3317	02906-03317	193	501	0.39	0.60	No	-308	94,864
226	FOWLER	N/O	KINGS CANYON	7056	7082	07056-07082	564	1,149	0.49	0.35	No	-585	342,225
227	FRESNO	E/O	99	4440	5870	04440-05870	1,592	1,637	0.97	0.30	Yes	-45	2,025
228	FRESNO	N/O	CLINTON	2554	2578	02554-02578	984	1,021	0.96	0.37	Yes	-37	1,369
229	FRESNO	N/O	DIVISADERO	2763	6092	02763-06092	881	899	0.98	0.60	Yes	-18	324
230	FRESNO	E/O	E	5418	5870	05418-05870	1,516	1,148	1.32	0.35	Yes	368	135,424
232	FRESNO	N/O	GETTYSBURG	2409	3232	02409-03232	1,484	696	2.13	0.60	No	788	620,944
233	FRESNO	N/O	HERNDON	2249	6100	02249-06100	2,287	2,478	0.92	0.26	Yes	-191	36,481
234	FRESNO	S/O	HERNDON	2249	2280	02249-02280	1,181	1,536	0.77	0.31	Yes	-355	126,025
235	FRESNO	S/O	MCKINLEY	2629	2646	02629-02646	724	893	0.81	0.60	Yes	-169	28,561
236	FRESNO	N/O	NEES	5461	6099	05461-06099	309	1,422	0.22	0.31	No	-1,113	1,238,769
237	FRESNO	S/O	SHAW	2339	3232	02339-03232	1,484	1,582	0.94	0.31	Yes	-98	9,604
238	FRESNO	N/O	SHIELDS	2502	2527	02502-02527	1,022	956	1.07	0.60	Yes	66	4,356
239	FRESNO	E/O	VAN NESS	3015	3016	03015-03016	847	915	0.93	0.60	Yes	-68	4,624
240	FRIANT	N/O	AUDUBON	2221	5036	02221-05036	4,487	4,202	1.07	0.23	Yes	285	81,225
241	FRIANT	N/O	CHAMPLAIN	3304	8116	03304-08116	1,966	1,423	1.38	0.31	No	543	294,849
242	FRIANT	N/O	SHEPHERD	2220	2221	02220-02221	2,852	2,347	1.22	0.27	Yes	505	255,025
244	FRUIT	S/O	ASHLAN	5429	5430	05429-05430	565	690	0.82	0.60	Yes	-125	15,625
245	FRUIT	S/O	CALIFORNIA	2867	2880	02867-02880	195	127	1.54	0.60	Yes	68	4,624

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
246	FRUIT	N/O	CLINTON	2571	3261	02571-03261	369	853	0.43	0.60	Yes	-484	234,256
247	FRUIT	S/O	HERNDON	2245	5058	02245-05058	827	728	1.14	0.60	Yes	99	9,801
248	FRUIT	S/O	SHAW	2380	3270	02380-03270	890	309	2.88	0.60	No	581	337,561
249	FULTON	N/O	DIVISADERO	4386	4384	04386-04384	301	322	0.93	0.60	Yes	-21	441
250	FULTON	N/O	SAN JOAQUIN	5857	5861	05857-05861	86	120	0.72	0.60	Yes	-34	1,156
251	G	N/O	EL DORADO	2775	2776	02775-02776	177	108	1.64	0.60	No	69	4,761
252	G	S/O	STANISLAUS	4392	5191	04392-05191	205	371	0.55	0.60	Yes	-166	27,556
253	G	S/O	STANISLAUS	4392	5191	04392-05191	205	741	0.28	0.60	No	-536	287,296
254	G	N/O	TUOLUMNE	4392	5191	04392-05191	205	371	0.55	0.60	Yes	-166	27,556
255	G	S/O	VENTURA	2105	5879	02105-05879	309	338	0.91	0.60	Yes	-29	841
256	GARFIELD	S/O	BARSTOW	6725	6756	06725-06756	11	52	0.21	0.60	No	-41	1,681
257	GATES	N/O	BLYTHE	3297	4632	03297-04632	1,167	946	1.23	0.60	Yes	221	48,841
258	GATES	N/O	SAN JOSE	3564	4632	03564-04632	1,147	1,056	1.09	0.36	Yes	91	8,281
259	GATES	S/O	SAN JOSE	3297	4632	03297-04632	1,167	760	1.54	0.60	Yes	407	165,649
260	GETTYSBURG	E/O	BLACKSTONE	2076	2408	02076-02408	872	1,105	0.79	0.35	Yes	-233	54,289
261	GETTYSBURG	E/O	CEDAR	2413	2414	02413-02414	1,230	1,401	0.88	0.31	Yes	-171	29,241
262	GETTYSBURG	E/O	WEST	2401	3205	02401-03205	84	128	0.66	0.60	Yes	-44	1,936
263	GOLDEN STATE	N/O	ASHLAN	4635	12254	04635-12254	1,485	1,732	0.86	0.30	Yes	-247	61,009
264	GOLDEN STATE	N/O	BUCKINGHAM	4635	12254	04635-12254	1,485	1,541	0.96	0.31	Yes	-56	3,136
265	GOLDEN STATE	S/O	CHURCH	2892	5406	02892-05406	302	346	0.87	0.60	Yes	-44	1,936
266	GOLDEN STATE	S/O	JENSEN	2892	5406	02892-05406	302	385	0.78	0.60	Yes	-83	6,889
267	GOLDEN STATE	N/O	SHAW	3723	4847	03723-04847	147	822	0.18	0.60	No	-675	455,625
268	GRANTLAND	N/O	BARSTOW	3293	5388	03293-05388	315	350	0.90	0.60	Yes	-35	1,225
269	GRANTLAND	N/O	BULLARD	2294	6165	02294-06165	348	502	0.69	0.60	Yes	-154	23,716
271	H	N/O	DIVISADERO	2761	6182	02761-06182	1,024	1,015	1.01	0.37	Yes	9	81
272	H	S/O	DIVISADERO	2777	3007	02777-03007	565	130	4.35	0.60	No	435	189,225
273	H	N/O	MERCED	4419	5207	04419-05207	581	166	3.50	0.60	No	415	172,225
274	HAYES	N/O	ASHLAN	3402	5633	03402-05633	84	119	0.71	0.60	Yes	-35	1,225
275	HAZELWOOD	N/O	BUTLER	2816	2834	02816-02834	598	257	2.33	0.60	No	341	116,281
276	HERNDON	E/O	BLACKSTONE	2068	4321	02068-04321	5,061	4,169	1.21	0.23	Yes	892	795,664
277	HERNDON	W/O	BRAWLEY	3281	5106	03281-05106	2,783	2,631	1.06	0.26	Yes	152	23,104
280	HERNDON	E/O	CEDAR	2252	4999	02252-04999	3,997	4,235	0.94	0.23	Yes	-238	56,644
281	HERNDON	E/O	CHESTNUT	2253	5002	02253-05002	4,404	3,301	1.33	0.24	No	1,103	1,216,609
282	HERNDON	E/O	FIRST	2251	5004	02251-05004	4,171	5,023	0.83	0.21	Yes	-852	725,904
283	HERNDON	E/O	FRUIT	2246	5037	02246-05037	5,432	5,673	0.96	0.20	Yes	-241	58,081
284	HERNDON	W/O	MARKS	3055	5041	03055-05041	3,334	3,191	1.04	0.25	Yes	143	20,449
285	HERNDON	E/O	MAROA	2068	2248	02068-02248	4,660	3,973	1.17	0.23	Yes	687	471,969
286	HERNDON	E/O	MILLBROOK	2251	5003	02251-05003	4,769	4,208	1.13	0.23	Yes	561	314,721
287	HERNDON	W/O	PALM	2246	5037	02246-05037	5,432	5,673	0.96	0.20	Yes	-241	58,081
289	HUGHES	N/O	KEARNEY	2815	2827	02815-02827	20	14	1.43	0.60	Yes	6	36
290	HUGHES	N/O	NIELSEN	3474	5326	03474-05326	329	116	2.84	0.60	No	213	45,369
291	HUGHES	S/O	SHIELDS	2517	2549	02517-02549	706	599	1.18	0.60	Yes	107	11,449
292	HUNTINGTON	E/O	R	3034	3155	03034-03155	78	214	0.36	0.60	No	-136	18,496
293	INGRAM	N/O	HERNDON	2247	3302	02247-03302	1,188	1,102	1.08	0.35	Yes	86	7,396
294	INYO	E/O	L	3160	5219	03160-05219	428	117	3.66	0.60	No	311	96,721
295	INYO	E/O	VAN NESS	3159	5219	03159-05219	62	176	0.35	0.60	No	-114	12,996
296	ISLAND WATERPARK	N/O	SHAW	6820	5596	06820-05596	2,747	530	5.18	0.60	No	2,217	4,915,089
297	JENNIFER	E/O	GATES	6063	6064	06063-06064	1,091	680	1.60	0.60	No	411	168,921
298	JENSEN	E/O	CEDAR	2925	6296	02925-06296	1,704	1,528	1.12	0.31	Yes	176	30,976
299	JENSEN	E/O	CLOVIS	2929	5411	02929-05411	1,388	993	1.40	0.60	Yes	395	156,025
300	JENSEN	W/O	CORNELIA	2908	5135	02908-05135	208	251	0.83	0.60	Yes	-43	1,849
301	JENSEN	E/O	ELM	2109	5730	02109-05730	899	1,568	0.57	0.31	No	-669	447,561
302	JENSEN	W/O	FRUIT	2913	5146	02913-05146	256	292	0.88	0.60	Yes	-36	1,296
303	JENSEN	E/O	GOLDEN STATE	2923	8440	02923-08440	2,024	2,041	0.99	0.28	Yes	-17	289
304	JENSEN	E/O	MAPLE	2926	3531	02926-03531	1,927	1,459	1.32	0.31	No	468	219,024
305	JENSEN	E/O	PEACH	2928	6200	02928-06200	1,376	1,634	0.84	0.30	Yes	-258	66,564
306	JENSEN	W/O	WILLOW	2927	5276	02927-05276	1,326	1,207	1.10	0.33	Yes	119	14,161
307	KEARNEY	W/O	FRESNO	2833	8410	02833-08410	605	328	1.84	0.60	No	277	76,729
308	KEARNEY	E/O	HUGHES	2827	2828	02827-02828	54	136	0.40	0.60	No	-82	6,724
309	KEARNEY	E/O	MARKS	2826	5329	02826-05329	95	100	0.95	0.60	Yes	-5	25
310	KEARNEY	E/O	WEST	2829	8418	02829-08418	205	148	1.39	0.60	Yes	57	3,249
312	KINGS CANYON	E/O	CEDAR	2189	2190	02189-02190	806	1,379	0.58	0.32	No	-573	328,329
313	KINGS CANYON	W/O	CLOVIS	2198	2199	02198-02199	1,535	1,684	0.91	0.30	Yes	-149	22,201
314	KINGS CANYON	E/O	MAPLE	2193	2194	02193-02194	736	1,273	0.58	0.33	No	-537	288,369
315	LANE	E/O	CHESTNUT	2820	5317	02820-05317	574	405	1.42	0.60	Yes	169	28,561
316	LANE	W/O	PEACH	2821	3555	02821-03555	1,640	304	5.39	0.60	No	1,336	1,784,896
317	LOS ANGELES	E/O	L	3042	3263	03042-03263	195	286	0.68	0.60	Yes	-91	8,281
318	M	N/O	CALAVERAS	4416	5240	04416-05240	86	96	0.90	0.60	Yes	-10	100
321	M	N/O	MERCED	2183	5225	02183-05225	36	139	0.26	0.60	No	-103	10,609
322	M	S/O	VENTURA	2102	3039	02102-03039	929	690	1.35	0.60	Yes	239	57,121
323	MAPLE	S/O	CALIFORNIA	3506	12170	03506-12170	785	801	0.98	0.60	Yes	-16	256
324	MAPLE	N/O	CLINTON	2537	2559	02537-02559	624	536	1.16	0.60	Yes	88	7,744
325	MAPLE	N/O	GETTYSBURG	2416	3143	02416-03143	603	297	2.03	0.60	No	306	93,636
326	MAPLE	S/O	MCKINLEY	2685	2695	02685-02695	887	1,056	0.84	0.36	Yes	-169	28,561
328	MAPLE	N/O	TEAGUE	3070	4598	03070-04598	340	648	0.52	0.60	Yes	-308	94,864
329	MAPLE	N/O	TULARE	2789	3488	02789-03488	1,736	1,228	1.41	0.33	No	508	258,064
330	MARKS	S/O	CALIFORNIA	2863	2903	02863-02903	253	131	1.93	0.60	No	122	14,884
331	MARKS	N/O	CLINTON	4276	12241	04276-12241	688	876	0.79	0.60	Yes	-188	35,344
332	MARKS	S/O	HERNDON	3055	6060	03055-06060	347	1,088	0.32	0.36	No	-741	549,081
333	MARKS	N/O	KEARNEY	2826	5129	02826-05129	305	265	1.15	0.60	Yes	40	1,600

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
334	MARKS	N/O	NIELSEN	5132	5133	05132-05133	234	529	0.44	0.60	Yes	-295	87,025
335	MARKS	S/O	SHAW	2375	2394	02375-02394	1,370	1,699	0.81	0.30	Yes	-329	108,241
336	MAROA	S/O	BULLARD	2306	2332	02306-02332	245	919	0.27	0.60	No	-674	454,276
337	MAROA	N/O	CLINTON	2576	2552	02576-02552	463	461	1.00	0.60	Yes	2	4
338	MAROA	S/O	HERNDON	2248	2275	02248-02275	336	694	0.48	0.60	Yes	-358	128,164
339	MAROA	S/O	SHAW	2384	2396	02384-02396	495	590	0.84	0.60	Yes	-95	9,025
340	MAROA	N/O	SIERRA	2274	2275	02274-02275	301	693	0.43	0.60	Yes	-392	153,664
341	MARTIN LUTHER KING JR	S/O	CALIFORNIA	2704	2872	02704-02872	67	360	0.19	0.60	No	-293	85,849
342	MCKINLEY	E/O	BLACKSTONE	2084	3249	02084-03249	1,788	1,798	0.99	0.30	Yes	-10	100
343	MCKINLEY	E/O	CEDAR	2634	5711	02634-05711	2,121	1,707	1.24	0.30	Yes	414	171,396
344	MCKINLEY	E/O	CHESTNUT	2636	8226	02636-08226	1,581	1,204	1.31	0.33	Yes	377	142,129
345	MCKINLEY	W/O	CLOVIS	2637	2638	02637-02638	1,317	838	1.57	0.60	Yes	479	229,441
346	MCKINLEY	E/O	FIRST	2630	2631	02630-02631	1,759	1,430	1.23	0.31	Yes	329	108,241
347	MCKINLEY	E/O	MARKS	2612	2613	02612-02613	982	215	4.57	0.60	No	767	588,289
348	MCKINLEY	E/O	PALM	2606	2621	02606-02621	1,167	979	1.19	0.60	Yes	188	35,344
349	MCKINLEY	E/O	VAN NESS	2624	2625	02624-02625	1,965	1,281	1.53	0.33	No	684	467,856
350	MCKINLEY	E/O	WEST	2617	2618	02617-02618	1,184	1,128	1.05	0.35	Yes	56	3,136
351	MILBURN	S/O	HERNDON	6058	12269	06058-12269	672	1,211	0.55	0.33	No	-539	290,521
352	MILBURN	N/O	SPRUCE	5526	5831	05526-05831	827	1,236	0.67	0.33	No	-409	167,281
353	MILBURN	S/O	SPRUCE	5526	8043	05526-08043	606	723	0.84	0.60	Yes	-117	13,689
354	MILLBROOK	S/O	ASHLAN	2449	2468	02449-02468	510	597	0.85	0.60	Yes	-87	7,569
355	MILLBROOK	N/O	CLINTON	2583	6192	02583-06192	6	168	0.04	0.60	No	-162	26,244
356	MILLBROOK	N/O	NEES	3074	3076	03074-03076	647	792	0.82	0.60	Yes	-145	21,025
357	MILLBROOK	S/O	SHAW	2975	8112	02975-08112	477	373	1.28	0.60	Yes	104	10,816
358	MINARETS	E/O	BLACKSTONE	2066	4597	02066-04597	561	1,459	0.38	0.31	No	-898	806,404
359	NEES	E/O	AUDUBON	6528	6560	06528-06560	2,224	1,983	1.12	0.28	Yes	241	58,081
360	NEES	E/O	CEDAR	2230	3078	02230-03078	1,813	1,699	1.07	0.30	Yes	114	12,996
361	NEES	E/O	FIRST	2229	3084	02229-03084	1,494	2,388	0.63	0.27	No	-894	799,236
362	NEES	E/O	FRESNO	3114	3115	03114-03115	1,603	2,160	0.74	0.27	Yes	-557	310,249
363	NEES	W/O	FRESNO	2228	5835	02228-05835	1,496	2,322	0.64	0.27	No	-826	682,276
364	NEES	E/O	MAPLE	3080	3097	03080-03097	1,321	1,729	0.76	0.30	Yes	-408	166,464
365	NEES	E/O	WILLOW	2232	4929	02232-04929	1,113	1,198	0.93	0.34	Yes	-85	7,225
366	NIELSEN	E/O	WEST	2772	2773	02772-02773	239	120	1.99	0.60	No	119	14,161
367	NORTH	W/O	CEDAR	3690	5321	03690-05321	716	551	1.30	0.60	Yes	165	27,225
368	NORTH	W/O	CHERRY	2948	5733	02948-05733	221	283	0.78	0.60	Yes	-62	3,844
369	NORTH	E/O	EAST	2951	3152	02951-03152	222	514	0.43	0.60	Yes	-292	85,264
370	NORTH	E/O	ELM	2948	5733	02948-05733	221	521	0.42	0.60	Yes	-300	90,000
371	NORTH	W/O	ELM	2110	2947	02110-02947	206	754	0.27	0.60	No	-548	300,304
372	NORTH	W/O	GOLDEN STATE	2953	2954	02953-02954	568	444	1.28	0.60	Yes	124	15,376
373	NORTH	E/O	MARTIN LUTHER KING JR	2946	2947	02946-02947	206	312	0.66	0.60	Yes	-106	11,236
374	NORTH	E/O	PEACH	2956	8086	02956-08086	215	169	1.27	0.60	Yes	46	2,116
375	NORTH	W/O	WALNUT	2945	3019	02945-03019	65	172	0.38	0.60	No	-107	11,449
376	NORTH	W/O	WEST	3318	8078	03318-08078	60	101	0.59	0.60	Yes	-41	1,681
377	O	S/O	TULARE	4610	5234	04610-05234	275	243	1.13	0.60	Yes	32	1,024
378	O	S/O	VENTURA	4612	6184	04612-06184	230	457	0.50	0.60	Yes	-227	51,529
379	OLIVE	W/O	99	4364	4366	04364-04366	95	724	0.13	0.60	No	-629	395,641
380	OLIVE	E/O	CEDAR	2683	2684	02683-02684	313	841	0.37	0.60	No	-528	278,784
381	OLIVE	W/O	CLOVIS	2692	5491	02692-05491	303	401	0.76	0.60	Yes	-98	9,604
382	OLIVE	E/O	FIRST	2679	2680	02679-02680	489	948	0.52	0.60	Yes	-459	210,681
383	OLIVE	E/O	GOLDEN STATE	2642	2667	02642-02667	483	435	1.11	0.60	Yes	48	2,304
385	OLIVE	W/O	WEBER	2642	2667	02642-02667	483	498	0.97	0.60	Yes	-15	225
386	ORANGE	N/O	CALIFORNIA	2854	2878	02854-02878	111	328	0.34	0.60	No	-217	47,089
387	ORANGE	S/O	CALIFORNIA	2878	3147	02878-03147	310	279	1.11	0.60	Yes	31	961
388	ORANGE	S/O	NORTH	3528	8102	03528-08102	100	45	2.22	0.60	No	55	3,025
389	P	S/O	TULARE	2133	5236	02133-05236	55	379	0.15	0.60	No	-324	104,976
390	P	S/O	VENTURA	6184	4461	06184-04461	88	147	0.60	0.60	Yes	-59	3,481
391	PALM	S/O	BELMONT	2724	5185	02724-05185	607	423	1.43	0.60	Yes	184	33,856
393	PALM	N/O	BULLARD	2303	2304	02303-02304	1,627	1,691	0.96	0.30	Yes	-64	4,096
394	PALM	N/O	CLINTON	2551	2573	02551-02573	1,333	970	1.37	0.60	Yes	363	131,769
395	PALM	N/O	DAKOTA	2463	2482	02463-02482	1,477	1,045	1.41	0.37	No	432	186,624
396	PALM	N/O	HERNDON	2246	6536	02246-06536	2,933	3,138	0.93	0.25	Yes	-205	42,025
397	PALM	S/O	HERNDON	2246	5065	02246-05065	1,471	1,631	0.90	0.30	Yes	-160	25,600
398	PALM	N/O	MCKINLEY	2606	2621	02606-02621	1,167	984	1.19	0.60	Yes	183	33,489
399	PALM	S/O	SHAW	2984	5159	02984-05159	18	1,153	0.02	0.34	No	-1,135	1,288,225
400	PEACH	S/O	ASHLAN	2454	5014	02454-05014	992	1,187	0.84	0.34	Yes	-195	38,025
401	PEACH	N/O	BELMONT	2745	5609	02745-05609	1,808	2,324	0.78	0.27	Yes	-516	266,256
402	PEACH	S/O	CALIFORNIA	3321	3537	03321-03537	734	964	0.76	0.60	Yes	-230	52,900
403	PEACH	N/O	CHURCH	2901	3535	02901-03535	642	631	1.02	0.60	Yes	11	121
404	PEACH	S/O	OLIVE	2690	5700	02690-05700	1,324	1,437	0.92	0.31	Yes	-113	12,769
405	PEACH	N/O	TULARE	2793	3546	02793-03546	1,331	1,355	0.98	0.32	Yes	-24	576
406	PERRIN	W/O	MAPLE	4595	5515	04595-05515	650	771	0.84	0.60	Yes	-121	14,641
407	PERRIN	N/O	SHEPHERD	3309	3310	03309-03310	1,356	1,626	0.83	0.30	Yes	-270	72,900
408	POLK	S/O	HERNDON	3164	6625	03164-06625	463	849	0.55	0.60	Yes	-386	148,996
409	POLK	S/O	SHAW	2370	6295	02370-06295	1,199	275	4.36	0.60	No	924	853,776
410	R	N/O	HUNTINGTON	3034	5258	03034-05258	194	524	0.37	0.60	No	-330	108,900
411	R	N/O	INYO	3034	3155	03034-03155	78	483	0.16	0.60	No	-405	164,025
412	R	N/O	TULARE	3022	3031	03022-03031	114	582	0.20	0.60	No	-468	219,024
413	SAN JOSE	E/O	GATES	3397	4633	03397-04633	21	200	0.11	0.60	No	-179	32,041
414	SAN PABLO	N/O	DIVISADERO	4388	4389	04388-04389	128	84	1.52	0.60	Yes	44	1,936
415	SANTA FE	S/O	PALO ALTO	6058	12269	06058-12269	672	1,089	0.62	0.36	No	-417	173,889

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes													
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared
416	SHAW	E/O	ANGUS	2137	2138	02137-02138	2,957	1,356	2.18	0.32	No	1,601	2,563,201
417	SHAW	W/O	ANGUS	2136	2137	02136-02137	3,227	3,164	1.02	0.25	Yes	63	3,969
418	SHAW	E/O	BLACKSTONE	2074	2135	02074-02135	3,816	3,486	1.09	0.24	Yes	330	108,900
419	SHAW	W/O	BRAWLEY	3117	3574	03117-03574	2,154	2,199	0.98	0.27	Yes	-45	2,025
420	SHAW	E/O	CEDAR	2140	2141	02140-02141	2,723	3,411	0.80	0.24	Yes	-688	473,344
421	SHAW	W/O	GOLDEN STATE	2371	2372	02371-02372	1,768	2,543	0.70	0.26	No	-775	600,625
422	SHAW	W/O	HAYES	3301	3398	03301-03398	609	1,004	0.61	0.37	No	-395	156,025
423	SHAW	W/O	LOLA	3399	12245	03399-12245	662	1,008	0.66	0.37	Yes	-346	119,716
424	SHAW	E/O	MARKS	2375	5426	02375-05426	2,584	2,939	0.88	0.26	Yes	-355	126,025
425	SHAW	W/O	VAN NESS	2377	4559	02377-04559	3,070	3,160	0.97	0.25	Yes	-90	8,100
426	SHAW	E/O	WEST	2378	2379	02378-02379	3,142	2,961	1.06	0.26	Yes	181	32,761
427	SHEPHERD	E/O	CEDAR	2222	3062	02222-03062	649	1,268	0.51	0.33	No	-619	383,161
428	SHEPHERD	E/O	FRIANT	2221	3059	02221-03059	1,681	2,316	0.73	0.27	No	-635	403,225
429	SHEPHERD	W/O	MAPLE	3062	3063	03062-03063	649	1,182	0.55	0.34	No	-533	284,089
430	SHIELDS	E/O	BLACKSTONE	2080	2526	02080-02526	3,039	2,481	1.22	0.26	Yes	558	311,364
431	SHIELDS	E/O	BLYTHE	2547	3346	02547-03346	286	418	0.68	0.60	Yes	-132	17,424
432	SHIELDS	E/O	CEDAR	2534	5709	02534-05709	1,998	1,553	1.29	0.31	Yes	445	198,025
433	SHIELDS	E/O	FOWLER	3142	5024	03142-05024	473	838	0.56	0.60	Yes	-365	133,225
434	SHIELDS	W/O	SUNNYSIDE	2542	9221	02542-09221	1,188	937	1.27	0.60	Yes	251	63,001
435	SHIELDS	E/O	TEMPERANCE	2544	5018	02544-05018	207	131	1.58	0.60	Yes	76	5,776
436	SHIELDS	E/O	VALENTINE	6171	6173	06171-06173	623	686	0.91	0.60	Yes	-63	3,969
437	SHIELDS	E/O	WEBER	2516	5104	02516-05104	359	393	0.91	0.60	Yes	-34	1,156
438	SHIELDS	E/O	WEST	2519	2520	02519-02520	1,365	826	1.65	0.60	No	539	290,521
439	SIERRA	E/O	BLACKSTONE	2277	12210	02277-12210	592	1,223	0.48	0.33	No	-631	398,161
440	SIERRA	E/O	CEDAR	5474	5481	05474-05481	2	139	0.01	0.60	No	-137	18,769
441	SIERRA	W/O	POLK	5631	6245	05631-06245	0	259	0.00	0.60	No	-259	67,081
442	SIERRA	E/O	WEST	2269	2270	02269-02270	88	605	0.15	0.60	No	-517	267,289
443	SIXTH	N/O	TULARE	2766	2785	02766-02785	67	189	0.35	0.60	No	-122	14,884
444	SPRUCE	W/O	BLYTHE	5039	6057	05039-06057	545	156	3.49	0.60	No	389	151,321
447	TEAGUE	E/O	MAPLE	3070	5469	03070-05469	276	877	0.31	0.60	No	-601	361,201
448	TEILMAN	N/O	NIELSEN	2754	2773	02754-02773	197	135	1.46	0.60	Yes	62	3,844
449	TEMPERANCE	S/O	BUTLER	5303	12198	05303-12198	653	545	1.20	0.60	Yes	108	11,664
450	TEMPERANCE	N/O	CLINTON	2544	8360	02544-08360	663	663	1.00	0.60	Yes	0	0
451	TEMPERANCE	N/O	SHIELDS	2544	8386	02544-08386	1,125	214	5.26	0.60	No	911	829,921
452	THORNE	N/O	KEARNEY	2177	2831	02177-02831	128	176	0.73	0.60	Yes	-48	2,304
453	TRINITY	N/O	STANISLAUS	8412	8428	08412-08428	183	83	2.20	0.60	No	100	10,000
456	TULARE	E/O	41	4408	4640	04408-04640	1,509	2,410	0.63	0.26	No	-901	811,801
457	TULARE	E/O	CEDAR	2787	2788	02787-02788	1,521	1,023	1.49	0.37	No	498	248,004
458	TULARE	E/O	CHESTNUT	2791	5315	02791-05315	747	578	1.29	0.60	Yes	169	28,561
459	TULARE	E/O	E	5419	5421	05419-05421	214	244	0.88	0.60	Yes	-30	900
460	TULARE	E/O	N	3510	4610	03510-04610	1,340	769	1.74	0.60	No	571	326,041
461	TULARE	W/O	R	5253	5254	05253-05254	1,827	1,111	1.64	0.35	No	716	512,656
462	TULARE	E/O	U	4409	4638	04409-04638	2,150	1,737	1.24	0.30	Yes	413	170,569
464	U	S/O	MARIPOSA	4409	5250	04409-05250	505	284	1.78	0.60	No	221	48,841
465	U	N/O	TULARE	4409	5250	04409-05250	505	430	1.17	0.60	Yes	75	5,625
466	VALENTINE	S/O	ASHLAN	3254	12176	03254-12176	249	231	1.08	0.60	Yes	18	324
467	VALENTINE	S/O	BARSTOW	3563	3566	03563-03566	30	245	0.12	0.60	No	-215	46,225
468	VALENTINE	S/O	CALIFORNIA	2862	5137	02862-05137	181	48	3.77	0.60	No	133	17,689
469	VALENTINE	S/O	CLINTON	2563	3442	02563-03442	39	151	0.26	0.60	No	-112	12,544
470	VALENTINE	S/O	MCKINLEY	2660	3467	02660-03467	7	106	0.07	0.60	No	-99	9,801
471	VAN NESS	N/O	41	4467	6186	04467-06186	935	476	1.96	0.60	No	459	210,681
472	VAN NESS	S/O	CALIFORNIA	2875	2882	02875-02882	182	192	0.95	0.60	Yes	-10	100
474	VAN NESS	N/O	DIVISADERO	2778	2762	02778-02762	483	201	2.40	0.60	No	282	79,524
475	VAN NESS	S/O	FRESNO	3026	3494	03026-03494	473	673	0.70	0.60	Yes	-200	40,000
476	VAN NESS	N/O	HERNDON	2243	5043	02243-05043	591	303	1.95	0.60	No	288	82,944
477	VAN NESS	S/O	MCKINLEY	2645	2624	02645-02624	180	542	0.33	0.60	No	-362	131,044
478	VAN NESS	N/O	SAN JOAQUIN	3010	8406	03010-08406	459	503	0.91	0.60	Yes	-44	1,936
479	VAN NESS	N/O	SHAW	2988	4852	02988-04852	335	406	0.83	0.60	Yes	-71	5,041
480	VAN NESS	N/O	SIERRA	2268	3182	02268-03182	756	414	1.83	0.60	No	342	116,964
481	VAN NESS	N/O	STANISLAUS	3010	4393	03010-04393	427	543	0.79	0.60	Yes	-116	13,456
482	VAN NESS	N/O	STANISLAUS	3010	4393	03010-04393	427	526	0.81	0.60	Yes	-99	9,801
483	VAN NESS	S/O	VENTURA	2104	3037	02104-03037	888	674	1.32	0.60	Yes	214	45,796
484	VENTURA	W/O	41	2184	5256	02184-05256	1,523	1,215	1.25	0.33	Yes	308	94,864
485	VENTURA	E/O	E	2106	5424	02106-05424	1,303	965	1.35	0.60	Yes	338	114,244
487	VENTURA	E/O	H	5223	8554	05223-08554	1,660	1,087	1.53	0.36	No	573	328,329
489	VENTURA	E/O	MAYOR	3500	5497	03500-05497	409	367	1.11	0.60	Yes	42	1,764
490	VENTURA	E/O	P	2100	5255	02100-05255	1,520	1,076	1.41	0.36	No	444	197,136
491	VENTURA	E/O	VAN NESS	2103	2104	02103-02104	1,046	930	1.12	0.60	Yes	116	13,456
492	WALNUT	S/O	CALIFORNIA	3586	6751	03586-06751	160	275	0.58	0.60	Yes	-115	13,225
493	WALNUT	S/O	CHURCH	2886	5166	02886-05166	81	111	0.73	0.60	Yes	-30	900
495	WALNUT	S/O	GROVE	2915	5166	02915-05166	49	110	0.45	0.60	Yes	-61	3,721
497	WALNUT	N/O	JENSEN	2915	5166	02915-05166	49	174	0.28	0.60	No	-125	15,625
498	WALNUT	N/O	NORTH	2945	3027	02945-03027	27	16	1.69	0.60	No	11	121
500	WEBER	N/O	OLIVE	2667	2698	02667-02698	886	806	1.10	0.60	Yes	80	6,400
501	WEBER	E/O	VALENTINE	3268	5111	03268-05111	1,010	918	1.10	0.60	Yes	92	8,464
502	WEST	N/O	ASHLAN	2438	3214	02438-03214	1,933	1,418	1.36	0.31	No	515	265,225
504	WEST	S/O	CALIFORNIA	2865	3029	02865-03029	134	82	1.63	0.60	No	52	2,704
505	WEST	N/O	CLINTON	2569	3260	02569-03260	1,671	957	1.75	0.60	No	714	509,796
506	WEST	S/O	DAKOTA	2478	2499	02478-02499	1,495	1,388	1.08	0.32	Yes	107	11,449
507	WEST	N/O	GETTYSBURG	2401	3123	02401-03123	1,771	1,714	1.03	0.30	Yes	57	3,249

Fresno COG Traffic Model GIS Validation Results: PM Peak Two-Way Total Traffic Volumes														
ID	Name	Location	Cross Street	A Node	B Node	Model A-B Node	Model Volume	Traffic Count	Model /Count	Target Deviation	Within Deviation	Model - Count	Difference Squared	
508	WEST	S/O	HERNDON	2244	3145	02244-03145	620	1,079	0.57	0.36	No	-459	210,681	
509	WEST	S/O	KEARNEY	2095	2829	02095-02829	81	148	0.55	0.60	Yes	-67	4,489	
510	WEST	N/O	MCKINLEY	2596	2617	02596-02617	1,387	981	1.41	0.60	Yes	406	164,836	
511	WEST	N/O	SANTA FE	2401	12298	02401-12298	1,766	1,418	1.25	0.31	Yes	348	121,104	
512	WEST	N/O	SHAW	4534	2010	04534-02010	3,451	1,481	2.33	0.31	No	1,970	3,880,900	
513	WEST	N/O	SIERRA	2269	3145	02269-03145	680	944	0.72	0.60	Yes	-264	69,696	
514	WEST	S/O	SIERRA	2269	3187	02269-03187	742	1,068	0.69	0.36	Yes	-326	106,276	
515	WHITES BRIDGE	E/O	WEST	2176	5754	02176-05754	131	240	0.55	0.60	Yes	-109	11,881	
516	WILLOW	S/O	CALIFORNIA	3534	3536	03534-03536	238	286	0.83	0.60	Yes	-48	2,304	
517	WILLOW	S/O	HERNDON	2254	5511	02254-05511	2,298	2,240	1.03	0.27	Yes	58	3,364	
518	WILLOW	N/O	SPRUCE	3100	3111	03100-03111	1,572	1,963	0.80	0.28	Yes	-391	152,881	
519	WILLOW	N/O	TEAGUE	3072	5468	03072-05468	848	1,687	0.50	0.30	No	-839	703,921	
520	WISHON	N/O	CLINTON	4352	4354	04352-04354	174	624	0.28	0.60	No	-450	202,500	
521	WISHON	N/O	FLORADORA	4355	4356	04355-04356	207	1,074	0.19	0.36	No	-867	751,689	
522	ELM AVE	S/O	CALIFORNIA	2120	6090	02120-06090	325	466	0.70	0.60	Yes	-141	19,881	
						Subtotal	**463,732**	**476,825**			**Model/Count Ratio =**	**0.97**	Targets	
											Percent Within Target Deviation =	**60%**	>75%	
											Percent Root Mean Square Error =	**46%**	<40%	
											Correlation Coefficient =	**0.88**	>0.88	

ATTACHMENT B

DMEIR Table 5.14-2
Roadway Functional Class and Peak Hour Level-of-Service Thresholds

It should be noted that this traditional methodology used to analyze the roadway system does not consider the potential impact on walking, bicycling, and transit. Pedestrians, bicyclists, and transit riders are all users of the roadway system but may not be fully recognized in the traffic operations analysis and the calculation of LOS. The LOS thresholds in Table 5.14-2 are based on driver's comfort and convenience. Identifying the need for roadway improvements based on the resulting roadway LOS can have unintended impacts to other modes such as increasing the walking time for pedestrians. In evaluating the roadway system, a lower vehicle LOS may be desired when balanced against other community values related to resource protection, social equity, economic development, and consideration of pedestrians, bicyclists, and transit users.

Table 5.14-2: Roadway Functional Class and Peak Hour Level-of-Service Thresholds

Functional Class	Median	Lanes	Peak Hour Level of Service Capacity Threshold				
			A	B	C	D	E
Freeway	N/A[1]	4	2,720	4,460	6,630	7,720	8,630
		3+Aux[2]	2,360	3,860	5,640	6,730	7,530
		3	2,000	3,270	4,660	5,740	6,430
		2+Aux	1,650	2,700	3,850	4,760	5,340
		2	1,300	2,130	3,050	3,790	4,260
State Expressway	Divided	6	2,410	3,960	5,730	7,450	8,450
		4	1,610	2,650	3,810	4,960	5,630
		2	810	1,340	1,890	2,470	2,810
City Expressway	Raised Median	6			1,860	6,170	6,520
		5			1,520	5,110	5,430
		4			1,180	4,050	4,340
		2			520	1,910	2,160
Super Arterial	Raised Median	6				4,910	6,240
		5				4,040	5,195
		4				3,170	4,150
Arterial	Raised Median	8			2,120	7,070	7,490
		6			1,560	5,270	5,610
		5			1,280	4,370	4,670
		4			1,000	3,470	3,730
		3			720	2,555	2,795
		2			440	1,640	1,860
	TWLTL[3]	4			940	3,290	3,550
		2			420	1,550	1,760

Functional Class	Median	Lanes	Peak Hour Level of Service Capacity Threshold				
			A	B	C	D	E
	Undivided	4			770	2,740	2,980
		2			340	1,270	1,480
Collector	TWLTL	4			940	3,290	3,550
		2			420	1,550	1,760
	Undivided	4			770	2,740	2,980
		2			340	1,270	1,480
One-Way	Undivided	3		1,960	2,240	2,430	2,610
		2		1,250	1,490	1,620	1,740
		1		550	740	800	870
Rural State Highway	Undivided	2	310	570	1,020	1,730	2,470
Rural Arterial	Divided	4			1,950	3,580	3,780
	Undivided	2			570	1,230	1,310
Rural Collector/Local	Undivided	2			700	930	1,000

Notes:
[1] N/A - Not applicable for operational class
[2] Aux - Auxiliary Lane
[3] TWLTL – Two-way Left-turn Lane
- LOS is not achievable because of type of facility.
Source: Fehr & Peers 2012.

Exhibit 5.14-2 shows existing AM peak hour traffic volumes (two-way total) and LOS (See Appendix H-3 for detail) and Exhibit 5.14-3 shows existing PM peak hour traffic volumes (two-way total) and LOS (See Appendix H-4 for detail). Exhibit 5.14-4 illustrates the planned roadway number of lanes.

Most roadways operate at LOS D or better during the AM and PM peak hours, except for the following, which operate at LOS E and F:

City of Fresno

- Willow Avenue – Copper to Behymer Avenue (LOS E during the PM peak hour)
- Willow Avenue – Behymer Avenue to Shepherd Avenue (LOS F during the PM peak hour)
- Golden State Boulevard – Shaw Avenue to Swift Avenue (LOS F during the PM peak hour)
- Golden State Boulevard – Motel Drive to Ashlan Avenue (LOS E during the PM peak hour)
- Nees Avenue – Jordan Avenue to Paula Avenue (LOS E during the PM peak hour)
- Cornelia Avenue – Ashlan Avenue to Griffith Way (LOS E during the PM peak hour)
- Marks Avenue – Dakota Avenue to Weber Avenue (LOS E during the PM peak hour)
- Clinton Avenue – Valentine Avenue to Marks Avenue (LOS F during the PM peak hour)

EXHIBIT B

7 October 2014
14213-00.02262

Ms. Carmen Borg
Shute, Mihaly, and Weinberger
396 Hayes Street
San Francisco, CA 94102

Subject: Review and Comment on Air Quality Analysis, City of Fresno General Plan and Development Code Update Draft Master Environmental Impact Report

Dear Ms. Borg:

At your request, BASELINE Environmental Consulting ("BASELINE") has reviewed the "Air Quality" section of the Draft Master Environmental Impact Report ("DMEIR") prepared for the City of Fresno's General Plan and Development Code Update ("General Plan Update"). BASELINE's review of the DMEIR specifically focused on the adequacy of the information presented to support the significance determinations for air quality impacts and the identification of feasible mitigation measures. This letter documents the results of our review.

1. Inadequate Analysis of Consistency with Applicable Air Quality Plans

Under Impact AIR-1, the DMEIR reports that the General Plan Update would have a less-than-significant impact on the implementation of applicable air quality plans (AQPs). The applicable AQPs adopted by the San Joaquin Valley Air Pollution Control District ("SJVAPCD") include the following:

- The 2004 *Extreme Ozone Attainment Demonstration Plan;*
- The *2007 Ozone Plan;*
- The *2007 PM10 Maintenance Plan and Request for Redesignation;*
- The *2008 PM2.5 Plan*;
- The *2012 PM2.5 Plan*; and
- The *2013 Plan for the Revoked 1-hour Ozone Standard.*

The DMEIR evaluated the significance of the General Plan Update's impact on implementing the applicable AQPs based on the following two criteria (DMEIR page 5.3-32):

1) If development proposed by the General Plan exceeds the growth projections used in the applicable attainment plan, it would produce a potentially significant impact; and
2) If the project includes goals, policies, and development standards that are in conflict with the development related control measures in the attainment plans, the project would be potentially significant.

On page 5.3-32, the DMEIR states compliance with criterion 1) as follows:

> *The growth projections used for the General Plan assume that growth in population, vehicle use and other source categories will occur at historically robust rates that are consistent with the rates used to develop the SJVAPCD's attainment plans.*

The DMEIR does not provide a summary of the quantified population, vehicle use, and other source category growth projections used in the six applicable AQPs or the General Plan Update. By not providing a comparison of the data, the consistency of the plan's growth projections with the applicable AQPs cannot be substantiated. Furthermore, MRO Engineers, Inc. has reported that the analysis of traffic growth projections used in the DMEIR are deficient, because the travel demand forecasting model used in the DMEIR was not properly calibrated to existing conditions. As a result, the future traffic growth estimates for the General Plan Update were underestimated. In addition, insufficient traffic model details were provided regarding how projected daily vehicle miles traveled (VMT) would increase.[1] An increase in traffic growth beyond the projections used in the applicable AQPs could result in a potentially significant impact. Therefore, the current analysis of the General Plan Update's consistency with growth projections used in the applicable AQPs is neither transparent nor adequate to support the finding of a less-than-significant impact.

On page 5.3-33, the DMEIR states compliance with criterion 2) as follows:

> *Review of the proposed goals and policies of the General Plan Update found them to be consistent with the applicable control measures of the SJVAPCD attainment plan.*

No evidence of the review process is documented to substantiate this opinion. There is no discussion of the primary goals and control measures contained in the six applicable AQPs and how they compare to the goals and policies of the General Plan Update. Therefore, the current analysis of the plan's consistency with control measures used in the applicable AQPs is inadequate.

2. Inadequate Analysis of Baseline and Forecasted Criteria Air Pollutant Emissions

Criteria air pollutant emissions for carbon monoxide ("CO"), sulfur dioxide ("SO2), ozone precursors, and particulate matter ("PM") are estimated under Impact AIR-2 and Impact AIR-3. The DMEIR estimated and forecasted annual emissions of CO, SO2, ozone precursors, and PM based on various models and inventories. The ozone precursors included reactive organic gases ("ROG") and nitrogen oxides ("NOx"). There are two fractions of PM emissions that are regulated based on aerodynamic resistance, diameters equal to or less than 10 microns (PM10) and 2.5 microns (PM2.5). As summarized in Tables 5.3-7 and 5.3-9 (DMEIR pages 5.3-36 and 5.3-42, respectively), baseline emissions of criteria pollutants from 2010

[1] MRO Engineers, Inc., 2014. *Review of "Transportation and Traffic" Analysis – Draft Master Environmental Impact Report General Plan and Development Code Update City of Fresno, Fresno County, California*. 10 September.

and future emissions under the General Plan Update were estimated for stationary, area, mobile (on-road and off-road vehicles), electricity, and natural gas sources.

The 2010 baseline estimates of pollutant emissions in the DMEIR were reviewed by comparing the total emissions from all sources to similar estimates provided by the California Air Resources Board ("CARB") in the 2013 edition of *The California Almanac of Emissions and Air Quality.* Each year, CARB publishes a new Almanac that summarizes existing criteria pollutant emissions trends in each county and forecasts emissions from all stationary (including fuel combustion), area, and mobile sources. The forecasts take into account the most recent emissions data, projected growth rates, and future adopted control measures to estimate emissions in future years. The CARB's California Emissions Projection Analysis Model ("CEPAM") was used to extract the 2010 emissions for Fresno County from the current Almanac for stationary, area, and mobile sources.

According to CEPAM for the 2013 Almanac, the 2010 total annual emissions of ROG from stationary, area[2], and mobile sources in Fresno County was about 20,200 tons. Since the City of Fresno's Planning Area represents about 60% of the County's population (DMEIR page 5.3-40), approximately 12,000 tons of ROG emissions could potentially be attributed to the City of Fresno. This estimate of ROG emissions is about four times greater than the 2010 baseline estimate of 3,105 tons reported in Table 5.3-9 (DMEIR page 5.3-42). This major discrepancy indicates that significant deficiencies are likely present in the methods applied by the preparers of the DMEIR to estimate the baseline pollutant emissions. These potential deficiencies are described under Section 3, below.

The estimates of future emissions in the DMEIR are not representative of the changes in emissions that would result from the proposed land uses changes in the General Plan Update. With the exception of emissions from on-road mobile vehicles, forecasted emissions are based on population growth estimates that are independent of the General Plan Update (i.e., the population growth estimates would be the same without the General Plan Update). For instance, there is not evaluation of how changing existing General Industrial (M-2) Zone to a Heavy Industrial (IH) Zone under the General Plan Update will change the net emissions of criteria pollutants in the City. As a result, the forecast of criteria pollutant emissions is not representative of the General Plan Update and the air quality analysis is incomplete.

3. Deficient Modeling Techniques Applied to Estimate Criteria Air Pollutant Emissions

In addition to the inadequate analysis of both baseline and forecasted criteria pollutant emissions discussed in Section 2, above, there are apparent deficiencies in the modeling techniques applied to estimate the criteria pollutant emissions in the DMEIR. These potential deficiencies are further described below for each air pollutant source.

3.1 Construction Emissions

Estimates of "worst-case" annual pollutant emissions from construction activities under the General Plan Update are summarized on DMEIR page 5.3-40 based on an inventory of 2008 emissions

[2] Emissions from farming operations were excluded from the area-source estimate, because the land use is not representative of the City of Fresno.

reported in the CARB's 2009 edition of *The California Almanac of Emissions and Air Quality.* As discussed above, the current Almanac is from 2013 and the CARB's CEPAM provides forecasts of pollutant emissions based on the current Almanac. According to CEPAM for the 2013 Almanac, the "worst-case" construction emissions of ROG would be about 1,500 tons per year, which is almost two times greater than the estimate of 812.6 tons per year reported in in the DMEIR (Table 5.3-8, page 5.3-40). Therefore, the current analysis of construction-related pollutant emissions in the DMEIR fails to analyze the worst-case scenario.

3.2 On-Road Motor Vehicle Emissions

Pollutant emissions from on-road motor vehicles were estimated by the preparers of the DMEIR using emission factors from the CARB's EMFAC2011 model and the DMEIR's traffic analysis data. As described above, the traffic analysis for the DMEIR underestimated future increases in VMT.[3] Therefore, the DMEIR's estimates of pollutant emissions from on-road motor vehicles are underestimated.

3.3 Electricity and Natural Gas Emissions

Pollutant emissions from electricity and natural gas were estimated by the preparers of the DMEIR using 2010 emission data reported by PG&E for residential and commercial properties and then projecting future emissions based on population growth. The emissions from industrial properties were not included in the analysis; therefore, the analysis is incomplete.

3.4 Stationary and Area Source Emissions

The preparers of the DMEIR combined estimates of pollutant emissions from stationary and area sources by using the CARB's CEIDARS database. However, emissions reported from the CEIDARS database are only representative of individual facilities and do not include most area sources, such as natural gas combustion from heating. In addition, the CEIDARS database does not include inventories of PM2.5 emissions, which were excluded from the air quality analysis.

The preparers of the DMEIR did not forecast future changes in pollutant emissions from stationary and area sources. Instead, the 2010 emissions reported from the CEIDARS database were assumed to remain constant over time because "*it would be impossible to predict if the emissions would increase or decrease in the future*"[4]. The CEIDARS database includes consecutive annual inventories of pollutant emissions from individual facilities in the City of Fresno from 1995 to 2012, which could be used to evaluate existing trends. However, no historical emission data or trend analysis was provided to support the opinion that forecasting emissions is impossible.

As discussed above, the CARB's CEPAM for the 2013 Almanac provides forecasts out to 2035 of pollutant emissions from stationary and area sources, including the emissions of PM2.5. For instance, emissions of PM2.5 from stationary sources between 2010 and 2035 are forecasted to steadily increase at a rate of about 7.2 tons per year. Based on the existing trends and forecasts of

[3] *Ibid*.

[4] Note at the bottom of DMEIR summary tables 5.3-7 and 5.3-9, on pages 5.3-36 and 5.3-42, respectively.

pollutant emissions provided by CARB, the DMEIR's assumption that pollutant emissions from stationary and areas sources cannot be analyzed is invalid and the current analysis of stationary and area source pollutant emissions is substantially inadequate.

4. Invalid Application of Project-Level Thresholds of Significance

The DMEIR used the project-level thresholds of significance adopted by the SJVAPCD in the *Guide for Assessing and Mitigating Air Quality Impacts* ("GAMAQI") to evaluate the significance of estimated ROG, NOx, PM10, and PM2.5 emissions from construction and operation under the General Plan Update. As described on DMEIR page 5.3-38, the project-level thresholds of significance were used because "*no other quantitative plan level thresholds have been adopted*". The use of project-level thresholds does not provide any meaningful context to evaluate the total pollutant emissions estimated for all existing and future projects under the General Plan Update. As summarized in Table 5.3-9 on page 5.3-42, the estimated emissions of criteria pollutants from all sources in the City of Fresno are one to two orders of magnitude greater than project-level thresholds, which further emphasizes the misuse of these thresholds to properly evaluate the scale and severity of emissions. Therefore, the use of project-level thresholds to evaluate the significance of ROG, NOx, PM10, and PM2.5 emissions in the DMEIR is invalid.

Since the GAMAQI does not provide guidance for evaluating the significance of criteria pollutant emissions for plans, the SJVAPCD should be consulted to determine an appropriate approach to analysis. For consideration, the Bay Area Air Quality Management District ("BAAQMD") has recommended[5] the following thresholds of significance[6] to evaluate operational-related criteria pollutants emissions for plans:

- Consistency with current AQP control measures; and
- A proposed plan's projected VMT or vehicle trips (either measure may be used) increase is less than or equal to its projected population increase.

As discussed above, the DMEIR has not adequately analyzed the General Plan Update's consistency with applicable AQP control measures and the traffic analysis has underestimated the increase in VMT. Therefore, the evaluation of ROG, NOx, PM10, and PM2.5 emissions in the DMEIR relative to the BAAQMD's recommended criteria remains inadequate.

[5] BAAQMD, 2010. *California Environmental Quality Act Air Quality Guidelines*. May.

[6] On March 5, 2012, the Alameda County Superior Court issued a judgment finding that the BAAQMD had failed to comply with CEQA before adopting the 2010 thresholds of significance, because the thresholds are considered a "project" subject to CEQA review. The court issued a writ of mandate ordering BAAQMD to set aside and cease dissemination of the adopted 2010 thresholds until approved under CEQA. In view of the court's order, the BAAQMD updated the *CEQA Air Quality Guidelines* in 2012 to exclude the recommended use of the 2010 thresholds for CEQA analysis. On August 13, 2013, the California First Appellate District Court of Appeal reversed the trial court's decision by finding that the adoption of the 2010 thresholds was not itself a "project" requiring CEQA review. Since the adoption process and scientific soundness of the 2010 thresholds of significance have not been challenged, the thresholds provide a meaningful context to evaluate air quality impacts.

5. Inadequate Evaluation of Feasible Mitigation Measures

Under Impact AIR-3, the DMEIR reports that the General Plan Update would have a significant impact on ambient air quality standards from the cumulative emissions of ozone precursors and PM. On page 5.3-50, the DMEIR states the following:

> *No mitigation measures beyond the General Plan policies, ordinances, and regulations are available to further reduce this impact*.

While the DMEIR provides a brief summary of applicable General Plan Update policies on Page 5.3-48, there is no evaluation of how effectively these policies would lessen the significance of the air quality impact. The SJVAPCD's GAMAQI recommends incorporating as many of the policies from the SJVAPCD's *Air Quality Guidelines for General Plans* (AQGGP) into a General Plan as possible. The AQGGP, which was adopted in 1994 and amended in 2005, is a guidance document that contains 75 examples of policies that the cities can directly incorporate into their General Plan. While many of the policies from the AQGGP were incorporated into the 2009 Air Quality Update of the 2025 Fresno General Plan Resources Conservation Element, there is no discussion in the DMEIR regarding the adequacy of the General Plan Update policies to incorporate remaining policies from the AQGGP.

The SJVAPCD's GAMAQI also recommends evaluating plan-level mitigation measures by quantifying the reductions that would result in mobile and area source emissions. There is no discussion or quantification in the DMEIR of how applicable policies would reduce air quality impacts. Since the adequacy of the General Plan Update policies relative to the AQGGP was not evaluated and the potential effect of policies on reducing air quality impacts was not quantified, the evaluation of feasible mitigation measures in the DMEIR is deficient.

6. Inadequate Analysis of Air Quality Impacts to Sensitive Receptors

The DMEIR does not provide an analysis of local community risks from air quality impacts relative to land use changes proposed under the General Plan Update. The location of existing sources of toxic air contaminants ("TACs") (e.g., freeways and gasoline dispensing facilities) are not mapped or evaluated to determine if proposed land use changes under the General Plan Update could potentially increase the exposure of sensitive receptors to TAC sources. As summarized in DMEIR Table 5.3-5, CARB recommends siting new sensitive land uses up to 1,000 feet away from TAC sources. The CARB's recommended setback distances can be used to evaluate if land uses changes under the General Plan Update would result in an increase exposure of sensitive receptors to existing TAC sources.

The SJVAPCD's GAMAQI recommends that General Plans identify intersections and corridors requiring CO hot spot analysis based on the results of the traffic analysis. A CO hot spot analysis includes the quantification of CO emissions and modeling of air dispersion to assess health risks to nearby receptors. The DMEIR does not include any evaluation of local CO impacts on sensitive receptors.

Based on the absence of an analysis of TAC and CO impacts on local communities relative to land use changes in the General Plan Update, the DMEIR analysis of air quality impacts to sensitive receptors is deficient.

7. Conclusions

Our review of the Air Quality section of the DMEIR identified inadequate analysis of feasible mitigation measures and impacts on applicable AQPs, ambient air quality standards, and sensitive receptors. Our review also identified the inappropriate use of project-level thresholds of significance to evaluate air quality impacts under the General Plan Update. These issues should be resolved prior to the City of Fresno's approval of the proposed General Plan Update.

Should you have any questions or comments, please contact us at your convenience.

Sincerely,

Patrick Sutton
Environmental Engineer

631386.1

EXHIBIT C

Fact Sheet

$PM_{2.5}$ Designations under the Clean Air Act

Common Sources of $PM_{2.5}$

Woodstoves



Photo Credit: WA Dept. of Ecology

Woodstoves are a primary source of $PM_{2.5}$, especially when wood is burned improperly or in uncertified devices. Control measures include public education for proper burning and woodstove changeout programs to replace outdated stoves.

Garbage & Open Burning



Burning trash is a dangerous and localized source of $PM_{2.5}$ which is especially dangerous to elders, children, pregnant women and people with respiratory or heart disease. Control measures include recycling and safe disposal of waste in a landfill.

Field, Forest & Rangeland Burning



Photo credit: Nez Perce Tribe

Large scale burns are major sources of $PM_{2.5}$, especially in areas where air pollution is trapped by topography or weather conditions, Control measures include airshed-wide monitoring for $PM_{2.5}$, phased burns, burn bans or "no burn" days, burn permits and other methods to ensure air quality conditions allow burning.

Mobile Sources / Diesel



Emissions from mobile sources such as cars trucks, tractors and train engines are significant sources of particulate matter and air toxics. Control measures include diesel retrofits, use of low sulfur fuel and educational outreach campaigns to encourage less driving and idling.

Stationary Sources



Industrial activities are an additional source of $PM_{2.5}$, but actually are a smaller contributor to high $PM_{2.5}$ levels across Region 10 compared with woodsmoke or field or forest burning.

What is $PM_{2.5}$?

$PM_{2.5}$ is particulate matter less than 2.5 microns in diameter composed of very small bits of ash, wood tars, soot and other substances created by combustion. To give you a sense for how tiny this is, the period at the end of this sentence is about 500 microns across. $PM_{2.5}$ particles are so small that they can evade the body's natural defense mechanisms and penetrate deep into lung tissue. The $PM_{2.5}$ particles can damage lung tissue, which can lead to serious respiratory problems. In 2006, EPA lowered the 24-hour fine particle standard from 65 micrograms per cubic meter $\mu g/m^3$) to 35 $\mu g/m^3$ to provide greater protection to public health from exposure to fine particles.

What are important sources of $PM_{2.5}$ in the Northwest and Alaska?

During the winter, when $PM_{2.5}$ levels are highest, key contributors in the Northwest and Alaska include burning of wood in woodstoves and fireplaces. During the summer, spring and fall, open burning, which has long been used as a waste disposal practice and as a management tool for croplands, rangelands, and forests, is a key source of $PM_{2.5}$. In addition, mobile sources and stationary sources can contribute to $PM_{2.5}$ levels.

What are $PM_{2.5}$ designations?

When EPA revises a standard, we are then required to designate all geographic areas within the United States as attainment, unclassifiable, or nonattainment under Section 107 of the Clean Air Act (CAA). Designating an area under the CAA is accomplished through a formal rulemaking process outlined in Section 107(d) of the Act. If an area does not meet the national standard for $PM_{2.5}$, an area will be designated as nonattainment. Attainment areas are areas that meet the standard, and unclassifiable areas are areas that cannot be classified on the basis of available information as meeting or not meeting the standard.

Which areas are subject to EPA's designations?

EPA will be making designations for all areas in the country, both for state lands and for Indian country. Under the process set out in the Clean Air Act, only states are required to submit recommendations for designations to EPA December 18, 2007.

How can tribes participate in the designations process?

Unlike states, tribes are not obligated to submit designation recommendations but are invited to participate in the designations process by submitting a designation recommendation for Indian country and/or by engaging in formal or informal consultation with EPA and states. Tribal consultation is important part of the designations process. Through consultation EPA can gather important information from tribes about designations of areas in Indian country or adjacent state land. Tribes can also through consultation, learn about state plans to prepare their recommendations for designation of lands which may surround Indian country.

What is the timeline for $PM_{2.5}$ designations?

December 18, 2006 - $PM_{2.5}$ standard strengthened.

Summer 2007 – EPA sends letters to states/tribes asking for designation recommendations and inviting consultation.

December 18, 2007 – States' designation recommendations are due to EPA. Tribes requested to send by this date.

August 2008 – EPA will send letters to states/tribes announcing whether or not we agree with their designation recommendations and to all areas that did not send letters announcing our proposed designation for their area.

August/Sept 2008 – EPA will open a 30 day public comment period on EPA's response to states/tribes recommendations.

December 18, 2008 – By this date EPA will issue final designations for all areas.

March 2012 - State attainment plans are due for state areas designated as nonattainment for $PM_{2.5}$.

What are the requirements for state or tribal areas that have been designated unclassifiable for $PM_{2.5}$?

An unclassifiable designation does not trigger any additional requirements for states/tribes. Existing requirements (Prevention of Significant Deterioration, FARR, etc.) do not change as a result of this designation.

What are the requirements for state or tribal areas that have been designated attainment?

An attainment designation does not trigger any additional requirements for states/tribes. Existing requirements (Prevention of Significant Deterioration, FARR, etc.) do not change as a result of this designation.

What are the requirements for state or tribal areas that have been designated nonattainment?

States with nonattainment areas are required to develop and submit plans to show how they will attain the $PM_{2.5}$ standard as expeditiously as possible. These plans are referred to as State Implementation Plans or SIPs. These plans are due in 2012 and should contain regulations and technical justification for how those regulations will result in attainment in the future. In addition, states are required to meet the standard within 5-10 years of the submittal of the attainment plan (or attainment SIP). Tribes with areas of Indian country adjacent to state nonattainment areas should work with states as they develop these plans. Tribes with nonattainment areas are not required to follow a specific timeline for submitting plans and attaining the standard but EPA encourages tribes to work with EPA to take appropriate actions to reduce $PM_{2.5}$ emissions.

What are the requirements for tribal stationary sources located in $PM_{2.5}$ nonattainment areas?

New and modified major sources must utilize control technologies that achieve the lowest emissions possible and must offset their increased emissions with reductions from existing sources. Existing sources must employ reasonable controls. Stationary sources may be required to reduce emissions further in order to attain the $PM_{2.5}$ standard.

Where can the public get more information about $PM_{2.5}$ designations?

Visit the EPA website http://epa.gov/pmdesignations or contact Krishna Viswanathan (206-553-2684) or Gina Bonifacino (206-553-2970) at the Regional Office.

EXHIBIT D

AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE



April 2005

California Environmental Protection Agency
California Air Resources Board

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To My Local Government Colleagues....

I am pleased to introduce this informational guide to air quality and land use issues focused on community health. As a former county supervisor, I know from experience the complexity of local land use decisions. There are multiple factors to consider and balance. This document provides important public health information that we hope will be considered along with housing needs, economic development priorities, and other quality of life issues.

An important focus of this document is prevention. We hope the air quality information provided will help inform decision-makers about the benefits of avoiding certain siting situations. The overarching goal is to avoid placing people in harm's way. Recent studies have shown that public exposure to air pollution can be substantially elevated near freeways and certain other facilities. What is encouraging is that the health risk is greatly reduced with distance. For that reason, we have provided some general recommendations aimed at keeping appropriate distances between sources of air pollution and land uses such as residences.

Land use decisions are a local government responsibility. The Air Resources Board's role is advisory and these recommendations do not establish regulatory standards of any kind. However, we hope that the information in this document will be seriously considered by local elected officials and land use agencies. We also hope that this document will promote enhanced communication between land use agencies and local air pollution control agencies. We developed this document in close coordination with the California Air Pollution Control Officers Association with that goal in mind.

I hope you find this document both informative and useful.

Barbara Riordan

Mrs. Barbara Riordan
Interim Chairman
California Air Resources Board

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Acknowledgments

The ARB staff would like to acknowledge the exceptional contributions made to this document by members of the ARB Environmental Justice Stakeholders Group. Since 2001, ARB staff has consistently relied on this group to provide critical and constructive input on implementing the specifics of ARB's environmental justice policies and actions. The Stakeholders Group is convened by the ARB, and comprised of representatives from local land use and air agencies, community interest groups, environmental justice organizations, academia, and business. Their assistance and suggestions throughout the development of this Handbook have been invaluable.

Executive Summary

The Air Resources Board's (ARB) primary goal in developing this document is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution. Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. Also, ARB community health risk assessments and regulatory programs have produced important air quality information about certain types of facilities that should be considered when siting new residences, schools, day care centers, playgrounds, and medical facilities (i.e., sensitive land uses). Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the non-cancer effects of air pollution. There is also substantial evidence that children are more sensitive to cancer-causing chemicals.

Focusing attention on these siting situations is an important preventative action. ARB and local air districts have comprehensive efforts underway to address new and existing air pollution sources under their respective jurisdictions. The issue of siting is a local government function. As more data on the connection between proximity and health risk from air pollution become available, it is essential that air agencies share what we know with land use agencies. We hope this document will serve that purpose.

The first section provides ARB recommendations regarding the siting of new sensitive land uses near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. This list consists of the air pollution sources that we have evaluated from the standpoint of the proximity issue. It is based on available information and reflects ARB's primary areas of jurisdiction – mobile sources and toxic air contaminants. A key air pollutant common to many of these sources is particulate matter from diesel engines. Diesel particulate matter (diesel PM) is a carcinogen identified by ARB as a toxic air contaminant and contributes to particulate pollution statewide.

Reducing diesel particulate emissions is one of ARB's highest public health priorities and the focus of a comprehensive statewide control program that is reducing diesel PM emissions each year. ARB's long-term goal is to reduce diesel PM emissions 85% by 2020. However, cleaning up diesel engines will take time as new engine standards phase in and programs to accelerate fleet turnover or retrofit existing engines are implemented. Also, these efforts are reducing diesel particulate emissions on a statewide basis, but do not yet capture every site where diesel vehicles and engines may congregate. Because living or going to school too close to such air pollution sources may increase both cancer and non-cancer health risks, we are recommending that proximity be considered in the siting of new sensitive land uses.

There are also other key toxic air contaminants associated with specific types of facilities. Most of these are subject to stringent state and local air district regulations. However, what we know today indicates that keeping new homes and other sensitive land uses from siting too close to such facilities would provide additional health protection. Chrome platers are a prime example of facilities that should not be located near vulnerable communities because of the cancer health risks from exposure to the toxic material used during their operations.

In addition to source specific recommendations, we also encourage land use agencies to use their planning processes to ensure the appropriate separation of industrial facilities and sensitive land uses. While we provide some suggestions, how to best achieve that goal is a local issue. In the development of these guidelines, we received valuable input from local government about the spectrum of issues that must be considered in the land use planning process. This includes addressing housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality of life issues. All of these factors are important considerations. The recommendations in the Handbook need to be balanced with other State and local policies.

Our purpose with this document is to highlight the potential health impacts associated with proximity to air pollution sources so planners explicitly consider this issue in planning processes. We believe that with careful evaluation, infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. One suggestion for achieving this goal is more communication between air agencies and land use planners. Local air districts are an important resource that should be consulted regarding sources of air pollution in their jurisdictions. ARB staff will also continue to provide updated technical information as it becomes available.

Our recommendations are as specific as possible given the nature of the available data. In some cases, like refineries, we suggest that the siting of new sensitive land uses should be avoided immediately downwind. However, we leave definition of the size of this area to local agencies based on facility specific considerations. Also, project design that would reduce air pollution exposure may be part of the picture and we encourage consultation with air agencies on this subject.

In developing the recommendations, our first consideration was the adequacy of the data available for an air pollution source category. Using that data, we assessed whether we could reasonably characterize the relative exposure and health risk from a proximity standpoint. That screening provided the list of air pollution sources that we were able to address with specific recommendations. We also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. In the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Due to the large variability in relative risk in the source categories, we chose not to apply

a uniform, quantified risk threshold as is typically done in air quality permitting programs. Instead, because these guidelines are not regulatory or binding on local agencies, we took a more qualitative approach in developing the distance-based recommendations.

Where possible, we recommend a minimum separation between a new sensitive land use and known air pollution risks. In other cases, we acknowledge that the existing health risk is too high in a relatively large area, that air agencies are working to reduce that risk, and that in the meantime, we recommend keeping new sensitive land uses out of the highest exposure areas. However, it is critical to note that our implied identification of the high exposure areas for these sources does not mean that the risk in the remaining impact area is insignificant. Rather, we hope this document will bring further attention to the potential health risk throughout the impact area and help garner support for our ongoing efforts to reduce health risk associated with air pollution sources. Areas downwind of major ports, rail yards, and other inter-modal transportation facilities are prime examples.

We developed these recommendations as a means to share important public health information. The underlying data are publicly available and referenced in this document. We also describe our rationale and the factors considered in developing each recommendation, including data limitations and uncertainties. These recommendations are advisory and should not be interpreted as defined "buffer zones." We recognize the opportunity for more detailed site-specific analyses always exists, and that there is no "one size fits all" solution to land use planning.

As California continues to grow, we collectively have the opportunity to use all the information at hand to avoid siting scenarios that may pose a health risk. As part of ARB's focus on communities and children's health, we encourage land use agencies to apply these recommendations and work more closely with air agencies. We also hope that this document will help educate a wider audience about the value of preventative action to reduce environmental exposures to air pollution.

1. ARB Recommendations on Siting New Sensitive Land Uses

Protecting California's communities and our children from the health effects of air pollution is one of the most fundamental goals of state and local air pollution control programs. Our focus on children reflects their special vulnerability to the health impacts of air pollution. Other vulnerable populations include the elderly, pregnant women, and those with serious health problems affected by air pollution. With this document, we hope to more effectively engage local land use agencies as partners in our efforts to reduce health risk from air pollution in all California communities.

Later sections emphasize the need to strengthen the connection between air quality and land use in both planning and permitting processes. Because the siting process for many, but not all air pollution sources involves permitting by local air districts, there is an opportunity for interagency coordination where the proposed location might pose a problem. To enhance the evaluation process from a land use perspective, section 4 includes recommended project related questions to help screen for potential proximity related issues.

Unlike industrial and other stationary sources of air pollution, the siting of new homes or day care centers does not require an air quality permit. Because these situations fall outside the air quality permitting process, it is especially important that land use agencies be aware of potential air pollution impacts.

The following recommendations address the issue of siting "sensitive land uses" near specific sources of air pollution; namely:

- High traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Dry cleaners
- Large gas dispensing facilities

The recommendations for each category include a summary of key information and guidance on what to avoid from a public health perspective.

Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).

We are characterizing sensitive land uses as simply as we can by using the example of residences, schools, day care centers, playgrounds, and medical facilities. However, a variety of facilities are encompassed. For example, residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers.

In developing these recommendations, ARB first considered the adequacy of the data available for each air pollution source category. We assessed whether we could generally characterize the relative exposure and health risk from a proximity standpoint. The documented non-cancer health risks include triggering of asthma attacks, heart attacks, and increases in daily mortality and hospitalization for heart and respiratory diseases. These health impacts are well documented in epidemiological studies, but less easy to quantify from a particular air pollution source. Therefore, the cancer health impacts are used in this document to provide a picture of relative risk. This screening process provided the list of source categories we were able to address with specific recommendations. In evaluating the available information, we also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. Due to the large variability in relative risk between the source categories, we chose not to apply a uniform, quantified risk threshold as is typically done in regulatory programs. Therefore, in the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Additionally, because this guidance is not regulatory or binding on local agencies, we took a more qualitative approach to developing distance based recommendations.

Where possible, we recommend a minimum separation between new sensitive land uses and existing sources. However, this is not always possible, particularly where there is an elevated health risk over large geographical areas. Areas downwind of ports and rail yards are prime examples. In such cases, we recommend doing everything possible to avoid locating sensitive receptors within the highest risk zones. Concurrently, air agencies and others will be working to reduce the overall risk through controls and measures within their scope of authority.

The recommendations were developed from the standpoint of siting new sensitive land uses. Project-specific data for new and existing air pollution sources are available as part of the air quality permitting process. Where such information is available, it should be used. Our recommendations are designed to fill a gap where information about existing facilities may not be readily available. These recommendations are only guidelines and are not designed to substitute for more specific information if it exists.

A summary of our recommendations is shown in Table 1-1. The basis and references[1] supporting each of these recommendations, including health studies, air quality modeling and monitoring studies is discussed below beginning with freeways and summarized in Table 1-2. As new information becomes available, it will be included on ARB's community health web page.

[1]Detailed information on these references are available on ARB's website at: http://www.ARB.ca.gov/ch/landuse.htm.

Table 1-1

Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities*

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	• Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. • Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	• Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloro-ethylene	• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. • Do not site new sensitive land uses in the same building with perc dry cleaning operations.
Gasoline Dispensing Facilities	• Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

*Notes:

- These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

- Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.
- The relative risk for these categories varies greatly (see Table 1-2). To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category descriptions).
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.
- This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.
- A summary of the basis for the distance recommendations can be found in Table 1-2.

Table 1-2

Summary of Basis for Advisory Recommendations

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Freeways and High-Traffic Roads	300 – 1,700	• In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet.
Distribution Centers[3]	Up to 500	• Because ARB regulations will restrict truck idling at distribution centers, transport refrigeration unit (TRU) operations are the largest onsite diesel PM emission source followed by truck travel in and out of distribution centers. • Based on ARB and South Coast District emissions and modeling analyses, we estimate an 80 percent drop-off in pollutant concentrations at approximately 1,000 feet from a distribution center.
Rail Yards	Up to 500	• The air quality modeling conducted for the Roseville Rail Yard Study predicted the highest impact is within 1,000 feet of the Yard, and is associated with service and maintenance activities. The next highest impact is between a half to one mile of the Yard, depending on wind direction and intensity.
Ports	Studies underway	• ARB will evaluate the impacts of ports and develop a new comprehensive plan that will describe the steps needed to reduce public health impacts from port and rail activities in California. In the interim, a general advisory is appropriate based on the magnitude of diesel PM emissions associated with ports.
Refineries	Under 10	• Risk assessments conducted at California refineries show risks from air toxics to be under 10 chances of cancer per million.[4] • Distance recommendations were based on the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, particularly during non-routine emissions releases.
Chrome Platers	10-100	• ARB modeling and monitoring studies show localized risk of hexavalent chromium diminishing significantly at 300 feet. There are data limitations in both the modeling and monitoring studies. These include variability of plating activities and uncertainty of emissions such as fugitive dust. Hexavalent chromium is one of the most potent toxic air contaminants. Considering these factors, a distance of 1,000 feet was used as a precautionary measure.
Dry Cleaners Using Perchloro-ethylene (perc)	15-150	• Local air district studies indicate that individual cancer risk can be reduced by as much as 75 percent by establishing a 300 foot separation between a sensitive land use and a one-machine perc dry cleaning operation. For larger operations (2 machines or more), a separation of 500 feet can reduce risk by over 85 percent.

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Gasoline Dispensing Facilities (GDF)[5]	Typical GDF: Less than 10 Large GDF: Between Less than 10 and 120	• Based on the CAPCOA Gasoline Service Station Industry-wide Risk Assessment Guidelines, most typical GDFs (less than 3.6 million gallons per year) have a risk of less than 10 at 50 feet under urban air dispersion conditions. Over the last few years, there has been a growing number of extremely large GDFs with sales over 3.6 and as high as 19 million gallons per year. Under rural air dispersion conditions, these large GDFs can pose a larger risk at a greater distance.

[1]For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g., 10 chances in a million).

[2]The estimated cancer risks are a function of the proximity to the specific category and were calculated independent of the regional health risk from air pollution. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 in a million.

[3]Analysis based on refrigerator trucks.

[4]Although risk assessments performed by refineries indicate they represent a low cancer risk, there is limited data on non-cancer effects of pollutants that are emitted from these facilities. Refineries are also a source of non-routine emissions and odors.

[5]A typical GDF in California dispenses under 3.6 million gallons of gasoline per year. The cancer risk for this size facility is likely to be less than 10 in a million at the fence line under urban air dispersion conditions.

A large GDF has fuel throughputs that can range from 3.6 to 19 million gallons of gasoline per year. The upper end of the risk range (i.e., 120 in a million) represents a hypothetical worst case scenario for an extremely large GDF under rural air dispersion conditions.

Freeways and High Traffic Roads

Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways (see findings below). These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children.

One such study that found an association between traffic and respiratory symptoms in children was conducted in the San Francisco Bay Area. Measurements of traffic-related pollutants showed concentrations within 300 meters (approximately 1,000 feet) downwind of freeways were higher than regional values. Most other studies have assessed exposure based on proximity factors such as distance to freeways or traffic density.

These studies linking traffic emissions with health impacts build on a wealth of data on the adverse health effects of ambient air pollution. The data on the effects of proximity to traffic-related emissions provides additional information that can be used in land use siting and regulatory actions by air agencies. The key observation in these studies is that close proximity increases both exposure and the potential for adverse health effects. Other effects associated with traffic emissions include premature death in elderly individuals with heart disease.

Key Health Findings

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

In these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects. In the above health studies, the association of traffic-related emissions with adverse health effects was seen within 1,000 feet and was

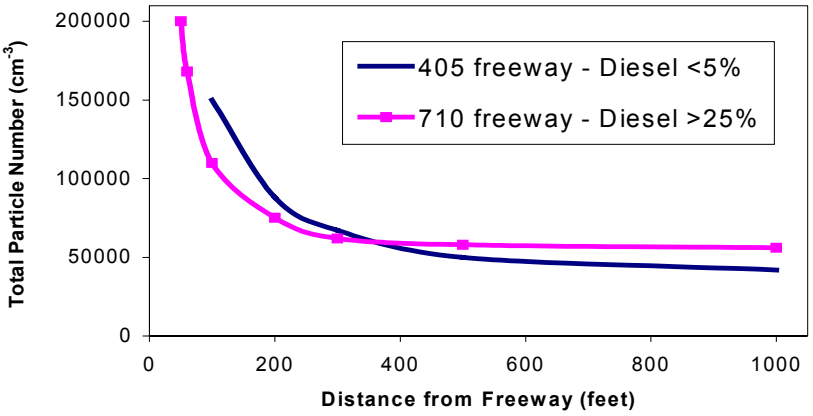
strongest within 300 feet. This demonstrates that the adverse effects diminished with distance.

In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease.

Distance Related Findings

A southern California study (Zhu, 2002) showed measured concentrations of vehicle-related pollutants, including ultra-fine particles, decreased dramatically within approximately 300 feet of the 710 and 405 freeways. Another study looked at the validity of using distance from a roadway as a measure of exposure

Figure 1-1
Decrease In Concentration of Freeway Diesel PM Emissions With Distance



to traffic related air pollution (Knape, 1999). This study showed that concentrations of traffic related pollutants declined with distance from the road, primarily in the first 500 feet.

These findings are consistent with air quality modeling and risk analyses done by ARB staff that show an estimated range of potential cancer risk that decreases with distance from freeways. The estimated risk varies with the local meteorology, including wind pattern. As an example, at 300 feet downwind from a freeway (Interstate 80) with truck traffic of 10,000 trucks per day, the potential cancer risk was as high as 100 in one million (ARB Roseville Rail Yard Study). The cancer health risk at 300 feet on the upwind side of the freeway was much

less. The risk at that distance for other freeways will vary based on local conditions – it may be higher or lower. However, in all these analyses the relative exposure and health risk dropped substantially within the first 300 feet. This phenomenon is illustrated in Figure 1-1.

State law restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles/day, or rural roadways with 50,000 vehicles with some exceptions.[2] However, no such requirements apply to the siting of residences, day care centers, playgrounds, or medical facilities. The available data show that exposure is greatly reduced at approximately 300 feet. In the traffic-related studies the additional health risk attributable to the proximity effect was strongest within 1,000 feet.

The combination of the children's health studies and the distance related findings suggests that it is important to avoid exposing children to elevated air pollution levels immediately downwind of freeways and high traffic roadways. These studies suggest a substantial benefit to a 500-foot separation.

The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem. As air agencies work to reduce the underlying regional health risk from diesel PM and other pollutants, the impact of proximity will also be reduced. In the meantime, as a preventative measure, we hope to avoid exposing more children and other vulnerable individuals to the highest concentrations of traffic-related emissions.

Recommendation

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

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[2] Section 17213 of the California Education Code and section 21151.8 of the California Public Resources Code. See also Appendix E for a description of special processes that apply to school siting.

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Distribution Centers

Distribution centers or warehouses are facilities that serve as a distribution point for the transfer of goods. Such facilities include cold storage warehouses, goods transfer facilities, and inter-modal facilities such as ports. These operations involve trucks, trailers, shipping containers, and other equipment with diesel engines. A distribution center can be comprised of multiple centers or warehouses within an area. The size can range from several to hundreds of acres, involving a number of different transfer operations and long waiting periods. A distribution center can accommodate hundreds of diesel trucks a day that deliver, load, and/or unload goods up to seven days a week. To the extent that these trucks are transporting perishable goods, they are equipped with diesel-powered transport refrigeration units (TRUs) or TRU generator sets.

The activities associated with delivering, storing, and loading freight produces diesel PM emissions. Although TRUs have relatively small diesel-powered engines, in the normal course of business, their emissions can pose a significant health risk to those nearby. In addition to onsite emissions, truck travel in and out of distribution centers contributes to the local pollution impact.

ARB is working to reduce diesel PM emissions through regulations, financial incentives, and enforcement programs. In 2004, ARB adopted two airborne toxic control measures that will reduce diesel PM emissions associated with distribution centers. The first will limit nonessential (or unnecessary) idling of diesel-fueled commercial vehicles, including those entering from other states or countries. This statewide measure, effective in 2005, prohibits idling of a vehicle more than five minutes at any one location.[3] The elimination of unnecessary idling will reduce the localized impacts caused by diesel PM and other air toxics

[3] For further information on the Anti-Idling ATCM, please click on: http://www.arb.ca.gov/toxics/idling/outreach/factsheet.pdf

in diesel vehicle exhaust. This should be a very effective new strategy for reducing diesel PM emissions at distribution centers as well as other locations.

The second measure requires that TRUs operating in California become cleaner over time. The measure establishes in-use performance standards for existing TRU engines that operate in California, including out-of-state TRUs. The requirements are phased-in beginning in 2008, and extend to 2019.[4]

ARB also operates a smoke inspection program for heavy-duty diesel trucks that focuses on reducing truck emissions in California communities. Areas with large numbers of distribution centers are a high priority.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

Although distribution centers are located throughout the state, they are usually clustered near transportation corridors, and are often located in or near population centers. Diesel PM emissions from associated delivery truck traffic and TRUs at these facilities may result in elevated diesel PM concentrations in neighborhoods surrounding those sites. Because ARB regulations will restrict truck idling at distribution centers, the largest continuing onsite diesel PM emission source is the operation of TRUs. Truck travel in and out of distribution centers also contributes to localized exposures, but specific travel patterns and truck volumes would be needed to identify the exact locations of the highest concentrations.

As part of the development of ARB's regulation for TRUs, ARB staff performed air quality modeling to estimate exposure and the associated potential cancer risk of onsite TRUs for a typical distribution center. For an individual person, cancer risk estimates for air pollution are commonly expressed as a probability of developing cancer from a lifetime (i.e., 70 years) of exposure. These risks were calculated independent of regional risk. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 additional cancer cases per one million population.

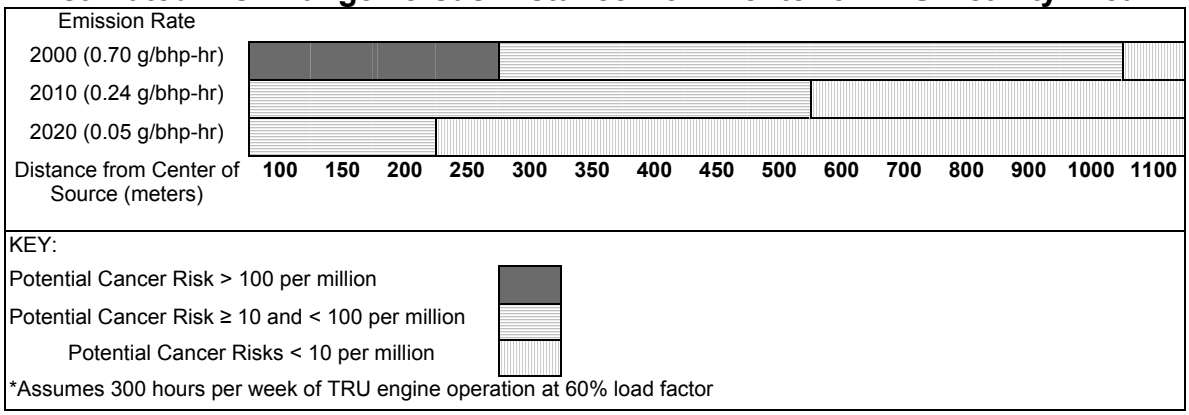
[4] For further information on the Transport Refrigeration Unit ATCM, please click on: http://www.arb.ca.gov/diesel/documents/trufaq.pdf

The diesel PM emissions from a facility are dependent on the size (horsepower), age, and number of engines, emission rates, the number of hours the truck engines and/or TRUs operate, distance, and meteorological conditions at the site. This assessment assumes a total on-site operating time for all TRUs of 300 hours per week. This would be the equivalent of 40 TRU-equipped trucks a day, each loading or unloading on-site for one hour, 12 hours a day and seven days a week.

As shown in Figure 1-2 below, at this estimated level of activity and assuming a current fleet diesel PM emission rate, the potential cancer risk would be over 100 in a million at 800 feet from the center of the TRU activity. The estimated potential cancer risk would be in the 10 to 100 per million range between 800 to 3,300 feet and fall off to less than 10 per million at approximately 3,600 feet. However with the implementation of ARB's regulation on TRUs, the risk will be significantly reduced.[5] We have not conducted a risk assessment for distribution centers based on truck traffic alone, but on an emissions basis, we would expect similar risks for a facility with truck volumes in the range of 100 per day.

Figure 1-2

Estimated Risk Range versus Distance from Center of TRU Activity Area*

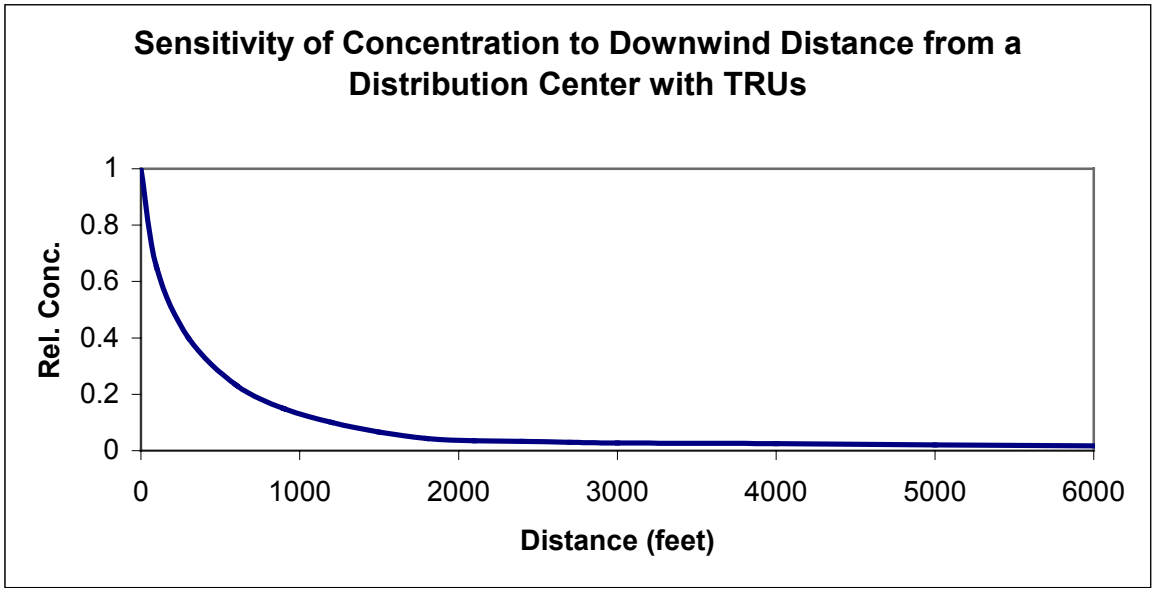


The estimated potential cancer risk level in Figure 1-2 is based on a number of assumptions that may not reflect actual conditions for a specific site. For example, increasing or decreasing the hours of diesel engine operations would change the potential risk levels. Meteorological and other facility specific parameters can also impact the results. Therefore, the results presented here are not directly applicable to any particular facility or operation. Rather, this information is intended to provide an indication as to the potential relative levels of risk that may be observed from operations at distribution centers. As shown in Figure 1-2, the estimated risk levels will decrease over time as lower-emitting diesel engines are used.

[5] These risk values assume an exposure duration of 70 years for a nearby resident and uses the methodology specified in the 2003 OEHHA health risk assessment guidelines.

Another air modeling analysis, performed by the South Coast Air Quality Management District (South Coast AQMD), evaluated the impact of diesel PM emissions from distribution center operations in the community of Mira Loma in southern California. Based on dispersion of diesel PM emissions from a large distribution center, Figure 1-3 shows the relative pollution concentrations at varying distances downwind. As Figure 1-3 shows, there is about an 80 percent drop off in concentration at approximately 1,000 feet.

Figure 1-3
Decrease In Relative Concentration of Risk
With Distance



Both the ARB and the South Coast AQMD analyses indicate that providing a separation of 1,000 feet would substantially reduce diesel PM concentrations and public exposure downwind of a distribution center. While these analyses do not provide specific risk estimates for distribution centers, they provide an indication of the range of risk and the benefits of providing a separation. ARB recommends a separation of 1,000 feet based on the combination of risk analysis done for TRUs and the decrease in exposure predicted with the South Coast AQMD modeling. However, ARB staff plans to provide further information on distribution centers as we collect more data and implement the TRU control measure.

Taking into account the configuration of distribution centers can also reduce population exposure and risk. For example, locating new sensitive land uses away from the main entry and exit points helps to reduce cancer risk and other health impacts.

Recommendations

- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week).

- Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.

References

- *Airborne Toxic Control Measure To Limit Diesel-Fueled Commercial Motor Vehicle Idling.* ARB (August 20, 2004). Rule effectiveness date awaiting submittal of regulation to the Office of Administration Law. http://www.arb.ca.gov/regact/idling/idling.htm

- *Revised Staff Report: Initial Statement of Reasons for Proposed Rulemaking. Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.* ARB (October 28, 2003). http://www.arb.ca.gov/regact/trude03/revisor.doc

- *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.* SCAQMD (August 2003) http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc

- *"Mira Loma Study: Analysis of the Impact of Diesel Particulate Emissions from Warehouse/Distribution Center Operations",* PowerPoint presentation. SCAQMD (July 31, 2002)

Rail Yards

Rail yards are a major source of diesel particulate air pollution. They are usually located near inter-modal facilities, which attract heavy truck traffic, and are often sited in mixed industrial and residential areas. ARB, working with the Placer County air district and Union Pacific Railroad, recently completed a study[6] of the Roseville Rail Yard (Yard) in northern California that focused on the health risk from diesel particulate. A comprehensive emissions analysis and air quality modeling were conducted to characterize the estimated potential cancer risk associated with the facility.

[6] To review the study, please click on: http://www.arb.ca.gov/diesel/documents/rrstudy.htm

The Yard encompasses about 950 acres on a one-quarter mile wide by four-mile long strip of land that parallels Interstate 80. It is surrounded by commercial, industrial, and residential properties. The Yard is one of the largest service and maintenance rail yards in the West with over 30,000 locomotives visiting annually.

Using data provided by Union Pacific Railroad, the ARB determined the number and type of locomotives visiting the Yard annually and what those locomotives were doing - moving, idling, or undergoing maintenance testing. Union Pacific provided the annual, monthly, daily, and hourly locomotive activity in the yard including locomotive movements; routes for arrival, departure, and through trains; and locomotive service and testing. This information was used to estimate the emissions of particulate matter from the locomotives, which was then used to model the potential impacts on the surrounding community.

The key findings of the study are:

- Diesel PM emissions in 2000 from locomotive operations at the Roseville Yard were estimated at about 25 tons per year.

- Of the total diesel PM in the Yard, moving locomotives accounted for about 50 percent, idling locomotives about 45 percent, and locomotive testing about five percent.

- Air quality modeling predicts potential cancer risks greater than 500 in a million (based on 70 years of exposure) in a 10-40 acre area immediately adjacent to the Yard's maintenance operations.

- The risk assessment also showed elevated cancer risk impacting a larger area covering about a 10 by 10 mile area around the Yard.

The elevated concentrations of diesel PM found in the study contribute to an increased risk of cancer and premature death due to cardiovascular disease, and non-cancer health effects such as asthma and other respiratory illnesses. The magnitude of the risk, the general location, and the size of the impacted area depended on the meteorological data used to characterize conditions at the Yard, the dispersion characteristics, and exposure assumptions. In addition to these variables, the nature of locomotive activity will influence a risk characterization at a particular rail yard. For these reasons, the quantified risk estimates in the Roseville Rail Yard Study cannot be directly applied to other rail yards. However, the study does indicate the health risk due to diesel PM from rail yards needs to be addressed. ARB, in conjunction with the U.S. Environmental Protection Agency (U.S. EPA), and local air districts, is working with the rail industry to identify and implement short term, mid-term and long-term mitigation strategies. ARB also intends to conduct a second rail study in southern California to increase its understanding of rail yard operations and the associated public health impacts.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

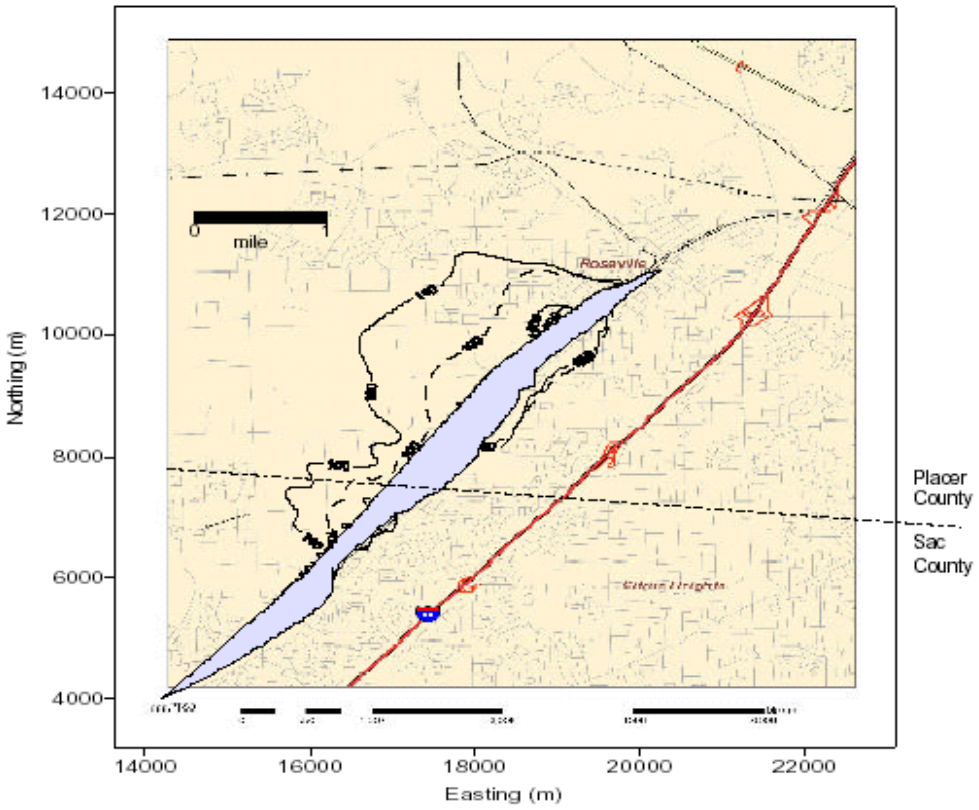
Two sets of meteorological data were used in the Roseville study because of technical limitations in the data. The size of the impact area was highly dependent on the meteorological data set used. The predicted highest impact area ranged from 10 - 40 acres with the two different meteorological data sets. This area, with risks estimated above 500 in a million, is adjacent to an area that includes a maintenance shop (see Figure 1-4). The high concentration of diesel PM emissions is due to the number of locomotives and nature of activities in this area, particularly idling locomotives.

The area of highest impact is within 1,000 feet of the Yard. The next highest impact zone as defined in the report had a predicted risk between 500 and 100 in one million and extends out between a half to one mile in some spots, depending on which meteorological conditions were assumed. The impact areas are irregular in shape making it difficult to generalize about the impact of distance at a particular location. However, the Roseville Rail Yard Study clearly indicates that the localized health risk is high, the impact area is large, and mitigation of the locomotive diesel PM emissions is needed.

For facilities like rail yards and ports, the potential impact area is so large that the real solution is to substantially reduce facility emissions. However, land use planners can avoid encroaching upon existing rail facilities and those scheduled for expansion. We also recommend that while air agencies tackle this problem, land use planners try not to add new sensitive individuals into the highest exposure areas. Finally, we recommend that land use agencies consider the potential health impacts of rail yards in their planning and permitting processes. Additional limitations and mitigation may be feasible to further reduce exposure on a site-specific basis.

Figure 1-4

Estimated Cancer Risk from the Yard
(100 and 500 in a million risk isopleths)



Notes: 100/Million Contours: Solid Line – Roseville Met Data; Dashed Line-McClellan Met Data, Urban Dispersion Coefficients, 80th Percentile Breathing Rate, All Locomotives' Activities (23 TPY), 70-Year Exposure

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard[7].

- Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

References

- *Roseville Rail Yard Study.* ARB (2004)

[7] The rail yard risk analysis was conducted for the Union Pacific rail yard in Roseville, California. This rail yard is one of the largest in the state. There are other rail yards in California with comparable levels of activity that should be considered "major" for purposes of this Handbook.

Ports

Air pollution from maritime port activities is a growing concern for regional air quality as well as air quality in nearby communities. The primary air pollutant associated with port operations is directly emitted diesel particulate. Port-related activities also result in emissions that form ozone and secondary particulate in the atmosphere. The emission sources associated with ports include diesel engine-powered ocean-going ships, harbor craft, cargo handling equipment, trucks, and locomotives. The size and concentration of these diesel engines makes ports one of the biggest sources of diesel PM in the state. For that reason, ARB has made it a top priority to reduce diesel PM emissions at the ports, in surrounding communities, and throughout California.

International, national, state, and local government collaboration is critical to reducing port emissions based on both legal and practical considerations. For example, the International Maritime Organization (IMO) and the U.S. EPA establish emission standards for ocean-going vessels and U.S.-flagged harbor craft, respectively. ARB is pursuing further federal actions to tighten these standards. In addition, ARB and local air districts are reducing emissions from ports through a variety of approaches. These include: incentive programs to fund cleaner engines, enhanced enforcement of smoke emissions from ships and trucks, use of dockside electricity instead of diesel engines, cleaner fuels for ships, harbor craft, locomotives, and reduced engine idling. The two ATCMs that limit truck idling and reduce emissions from TRUs (discussed under “Distribution Centers”) also apply to ports.

ARB is also developing several other regulations that will reduce port-related emissions. One rule would require ocean-going ships to use a cleaner marine diesel fuel to power auxiliary engines while in California coastal waters and at dock. Ships that frequently visit California ports would also be required to further reduce their emissions. ARB has adopted a rule that would require harbor craft to use the same cleaner diesel fuel used by on-road trucks in California. In 2005, ARB will consider a rule that would require additional controls for in-use harbor craft, such as the use of add-on emission controls and accelerated turnover of older engines.

Key Health Findings

Port activities are a major source of diesel PM. Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

The Ports of Los Angeles and Long Beach provide an example of the emissions impact of port operations. A comprehensive emissions inventory was completed in June 2004. These ports combined are one of the world's largest and busiest seaports. Located in San Pedro Bay, about 20 miles south of downtown Los Angeles, the port complex occupies approximately 16 square miles of land and water. Port activities include five source categories that produce diesel emissions. These are ocean-going vessels, harbor craft, cargo handling equipment, railroad locomotives, and heavy-duty trucks.

The baseline emission inventory provides emission estimates for all major air pollutants. This analysis focuses on diesel PM from in-port activity because these emissions have the most potential health impact on the areas adjacent to the port. Ocean vessels are the largest overall source of diesel PM related to the ports, but these emissions occur primarily outside of the port in coastal waters, making the impact more regional in nature.

The overall in-port emission inventory for diesel particulate for the ports of Los Angeles and Long Beach is estimated to be 550 tons per year. The emissions fall in the following major categories: ocean-going vessels (17%), harbor craft (25%), cargo handling (47%), railroad locomotive (3%), and heavy duty vehicles (8%). In addition to in-port emissions, ship, rail, and trucking activities also contribute to regional emissions and increase emissions in nearby neighborhoods. Off-port emissions associated with related ship, rail, and trucking activities contribute an additional 680 tons per year of diesel particulate at the Port of Los Angeles alone.

To put this in perspective, the diesel PM emissions estimated for the Roseville Yard in ARB's 2004 study are 25 tons per year. The potential cancer risk associated with these emissions is 100 in one million at a distance of one mile, or one half mile, depending on the data set used. This rail yard covers one and a half square miles. The Los Angeles and Long Beach ports have combined diesel PM emissions of 550 tons per year emitted from a facility that covers a much larger area - 16 miles. The ports have about twice the emission density of the rail yard - 34 tons per year per square mile compared to 16 tons per year per square mile. However, while this general comparison is illustrative of the overall size of the complex, a detailed air quality modeling analysis would be needed to assess the potential health impact on specific downwind areas near the ports.

ARB is in the process of evaluating the various port-related emission sources from the standpoint of existing emissions, growth forecasts, new control options, regional air quality impacts, and localized health risk. A number of public processes - both state and local - are underway to address various aspects of these issues. Until more of these analyses are complete, there is little basis for recommending a specific separation between new sensitive land uses and ports.

For example, the type of data we have showing the relationship between air pollutant concentrations and distance from freeways is not yet available.

Also, the complexity of the port facilities makes a site-specific analysis critical. Ports are a concentration of multiple emission sources with differing dispersion and other characteristics. In the case of the Roseville rail yard, we found a high, very localized impact associated with a particular activity, service and maintenance. By contrast, the location, size, and nature of impact areas can be expected to vary substantially for different port activities. For instance, ground level emissions from dockside activities would behave differently from ship stack level emissions.

Nonetheless, on an emissions basis alone, we expect locations downwind of ports to be substantially impacted. For that reason, we recommend that land use agencies track the current assessment efforts, and consider limitations on the siting of new sensitive land uses in areas immediately downwind of ports.

Recommendations

Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.

References

- *Roseville Rail Yard Study.* ARB (2004)
- Final Draft, "*Port-Wide Baseline Air Emissions Inventory."* Port of Los Angeles (June 2004)
- Final Draft, "*2002 Baseline Air Emissions Inventory."* Port of Long Beach (February 2004)

Petroleum Refineries

A petroleum refinery is a complex facility where crude oil is converted into petroleum products (primarily gasoline, diesel fuel, and jet fuel), which are then transported through a system of pipelines and storage tanks for final distribution by delivery truck to fueling facilities throughout the state. In California, most crude oil is delivered either by ship from Alaska or foreign sources, or is delivered via pipeline from oil production fields within the state. The crude oil then undergoes many complex chemical and physical reactions, which include distillation, catalytic cracking, reforming, and finishing. These refining processes have the potential to emit air contaminants, and are subject to extensive emission controls by district regulations.

As a result of these regulations covering the production, marketing, and use of gasoline and other oil by-products, California has seen significant regional air quality benefits both in terms of cleaner fuels and cleaner operating facilities. In

the 1990s, California refineries underwent significant modifications and modernization to produce cleaner fuels in response to changes in state law. Nevertheless, while residual emissions are small when compared to the total emissions controlled from these major sources, refineries are so large that even small amounts of fugitive, uncontrollable emissions and associated odors from the operations, can be significant. This is particularly the case for communities that may be directly downwind of the refinery. Odors can cause health symptoms such as nausea and headache. Also, because of the size, complexity, and vast numbers of refinery processes onsite, the occasional refinery upset or malfunction can potentially result in acute or short-term health effects to exposed individuals.

Key Health Findings

Petroleum refineries are large single sources of emissions. For volatile organic compounds (VOCs), eight of the ten largest stationary sources in California are petroleum refineries. For oxides of nitrogen (NOx), four of the ten largest stationary sources in California are petroleum refineries. Both of these compounds react in the presence of sunlight to form ozone. Ozone impacts lung function by irritating and damaging the respiratory system. Petroleum refineries are also large stationary sources of both particulate matter under 10 microns in size (PM_{10}) and particulate matter under 2.5 microns in size ($PM_{2.5}$). Exposure to particulate matter aggravates a number of respiratory illnesses, including asthma, and is associated with premature mortality in people with existing cardiac and respiratory disease. Both long-term and short-term exposure can have adverse health impacts. Finer particles pose an increased health risk because they can deposit deep in the lung and contain substances that are particularly harmful to human health. NOx are also significant contributors to the secondary formation of $PM_{2.5}$.

Petroleum refineries also emit a variety of toxic air pollutants. These air toxics vary by facility and process operation but may include: acetaldehyde, arsenic, antimony, benzene, beryllium, 1,3-butadiene, cadmium compounds, carbonyl sulfide, carbon disulfide, chlorine, dibenzofurans, diesel particulate matter, formaldehyde, hexane, hydrogen chloride, lead compounds, mercury compounds, nickel compounds, phenol, 2,3,7,8 tetrachlorodibenzo-p-dioxin, toluene, and xylenes (mixed) among others. The potential health effects associated with these air toxics can include cancer, respiratory irritation, and damage to the central nervous system, depending on exposure levels.

Distance Related Findings

Health risk assessments for petroleum refineries have shown risks from toxic air pollutants that have quantifiable health risk values to be around 10 potential cancer cases per million. Routine air monitoring and several air monitoring studies conducted in the San Francisco Bay Area (Crockett) and the South Coast Air Basin (Wilmington) have not identified significant health risks specifically

associated with refineries. However, these studies did not measure diesel PM as no accepted method currently exists, and there are many toxic air pollutants that do not have quantifiable health risk values.

In 2002, ARB published a report on the results of the state and local air district air monitoring done near oil refineries. The purpose of this evaluation was to try to determine how refinery-related emissions might impact nearby communities. This inventory of air monitoring activities included 10 ambient air monitoring stations located near refineries in Crockett and four stations near refineries in Wilmington. These monitoring results did not identify significant increased health risks associated with the petroleum refineries. In 2002-2003, ARB conducted additional monitoring studies in communities downwind of refineries in Crockett and Wilmington. These monitoring results also did not indicate significant increased health risks from the petroleum refineries.

Consequently, there are no air quality modeling or air monitoring data that provides a quantifiable basis for recommending a specific separation between refineries and new sensitive land uses. However, in view of the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, we believe the siting of new sensitive land uses immediately downwind should be avoided. Land use agencies should consult with the local air district when considering how to define an appropriate separation for refineries within their jurisdiction.

Recommendations

- Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.

References

- *Review of Current Ambient Air Monitoring Activities Related to California Bay Area and South Coast Refineries. ARB (March 2002)* http://www.arb.ca.gov/aaqm/qmosqual/special/mldrefinery.pdf
- *Community Air Quality Monitoring: Special Studies – Crockett. ARB (September 2004)* http://www.arb.ca.gov/ch/communities/studies/crockett/crockett.htm
- *Wilmington Study - Air Monitoring Results. ARB (2003)* http://www.arb.ca.gov/ch/communities/studies/wilmington/wilmington.htm

Chrome Plating Operations

Chrome plating operations rely on the use of the toxic metal hexavalent chromium, and have been subject to ARB and local air district control programs for many years. Regulation of chrome plating operations has reduced statewide emissions substantially. However, due to the nature of chrome plating

operations and the highly toxic nature of hexavalent chromium, the remaining health risk to nearby residents is a continuing concern.

Chrome plating operations convert hexavalent chromium in solution to a chromium metal layer by electroplating, and are categorized based upon the thickness of the chromium metal layer applied. In “decorative plating”, a layer of nickel is first plated over a metal substrate. Following this step, a thin layer of chromium is deposited over the nickel layer to provide a decorative and protective finish, for example, on faucets and automotive wheels. “Hard chrome plating” is a process in which a thicker layer of chromium metal is deposited directly on metal substrates such as engine parts, industrial machinery, and tools to provide greater protection against corrosion and wear.

Hexavalent chromium is emitted into the air when an electric current is applied to the plating bath. Emissions are dependent upon the amount of electroplating done per year and the control requirements. A unit of production referred to as an ampere-hour represents the amount of electroplating produced. Small facilities have an annual production rate of 100,000 – 500,000 ampere-hours, while medium-size facilities may have a production rate of 500,000 to about 3 million ampere-hours. The remaining larger facilities have a range of production rates that can be as high as 80 million ampere-hours.

The control requirements, which reduce emissions from the plating tanks, vary according to the size and type of the operation. Facilities either install add-on pollution control equipment, such as filters and scrubbers, or in-tank controls, such as fume suppressants and polyballs. With this combination of controls, the overall hexavalent chromium emissions have been reduced by over 90 percent. Larger facilities typically have better controls that can achieve efficiencies greater than 99 percent. However, even with stringent controls, the lack of maintenance and good housekeeping practices can lead to problems. And, since the material itself is inherently dangerous, any lapse in compliance poses a significant risk to nearby residents.

A 2002 ARB study in the San Diego community of Barrio Logan measured unexpectedly high concentrations of hexavalent chromium near chrome platers. The facilities were located in a mixed-use area with residences nearby. The study found that fugitive dust laden with hexavalent chromium was an important source of emissions that likely contributed to the elevated cancer risk. Largely as a result of this study, ARB is in the process of updating the current requirements to further reduce the emissions from these facilities.

In December 2004, the ARB adopted an ATCM to reduce emissions of hexavalent chromium and nickel from thermal spraying operations through the installation of best available control technology. The ATCM requires all existing facilities to comply with its requirements by January 1, 2006. New and modified thermal spraying operations must comply upon initial startup. An existing thermal spraying facility may be exempt from the minimum control efficiency

requirements of the ATCM if it is located at least 1,640 feet from the nearest sensitive receptor and emits no more than 0.5 pound per year of hexavalent chromium.[8]

Key Health Findings

Hexavalent chromium is one of the most toxic air pollutants regulated by the State of California. Hexavalent chromium is a carcinogen and has been identified in worker health studies as causing lung cancer. Exposure to even very low levels of hexavalent chromium should be avoided.

The California Office of Environmental Health Hazard Assessment has found that: 1) many epidemiological studies show a strong association between hexavalent chromium exposure in the work place and respiratory cancer; and 2) all short-term assays reported show that hexavalent chromium compounds can cause damage to human DNA.

Hexavalent chromium when inhaled over a period of many years can cause a variety of non-cancer health effects. These health effects include damage to the nose, blood disorders, lung disease, and kidney damage. The non-cancer health impacts occur with exposures considerably higher than exposures causing significant cancer risks. It is less likely that the public would be exposed to hexavalent chromium at levels high enough to cause these non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected.

Distance Related Findings

ARB's 2002 Barrio Logan Study measured concentrations of hexavalent chromium in the air near two chrome plating facilities. The study was conducted from December 2001 to May 2002. There were two chrome platers on the street - one decorative and one hard plater. The purpose of the study was to better understand the near source impact of hexavalent chromium emissions. Air monitors were placed at residences next to the platers and at varying distances down the street. The monitors were moved periodically to look at the spatial distribution of the impact. Source testing and facility inspections identified one of the facilities as the likely source.

The first two weeks of monitoring results showed unexpectedly high levels of hexavalent chromium at a number of the monitoring sites. The high concentrations were intermittent. The concentrations ranged from 1 to 22 ng/m3 compared to the statewide average of 0.1 ng/m3. If these levels were to continue for 70 years, the potential cancer risk would be 150 in one million. The highest value was found at an air monitor behind a house adjacent to one of the

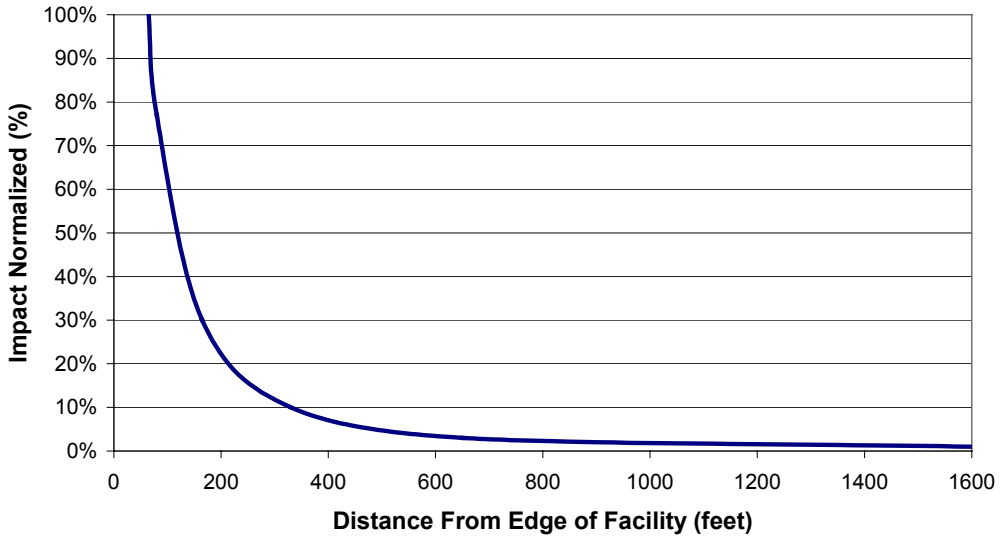
[8] For further information on the ATCM, please refer to: http://www.arb.ca.gov/regact/thermspr/thermalspr.htm

plating facilities–approximately 30 feet from the back entrance. Lower, but significant concentrations were found at an ambient air monitor 250 feet away.

The monitoring covered a period when the facility was not operating its plating tank. During this period, one of the highest concentrations was measured at an adjacent house. It appears that chromium-laden dust was responsible for high concentrations at this location since there was no plating activity at the time. Dust samples from the facility were tested and found to contain high levels of hexavalent chromium. On the day the highest concentration was measured at the house next door, a monitor 350 feet away from the plater's entrance showed very little impact. Similar proximity effects are shown in ARB modeling studies.

Figure 1-5 shows how the relative health risk varies as a function of distance from a chrome plater. This analysis is based on a medium-sized chrome plater with an annual production rate of 3 million ampere-hours. As shown in Figure 1- 5, the potential health risk drops off rapidly, with over 90 percent reduction in risk within 300 feet. This modeling was done in 2003 as part of a review of ARB's current air toxic control measure for chrome platers and is based on data from a recent ARB survey of chrome platers in California. The emission

Figure 1-5
Risk vs. Distance From Chrome Plater
(Based on plating tank emissions)



rates are only for plating operations. Because there are insufficient data available to directly quantify the impacts, the analysis does not include fugitive emissions, which the Barrio Logan analysis indicated could be significant.

Both the ARB Barrio Logan monitoring results and ARB's 2003 modeling analysis suggests that the localized emissions impact of a chrome plater diminishes significantly at 300 feet. However, in developing our recommendation, we also considered the following factors:

- some chrome platers will have higher volumes of plating activity,
- potential dust impacts were not modeled,
- we have only one monitoring study looking at the impact of distance, and,
- hexavalent chromium is one of the most potent toxic air contaminants ARB has identified.

Given these limitations in the analysis, we recommend a separation of 1,000 feet as a precautionary measure. For large chrome platers, site specific information should be obtained from the local air district.

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.

References

- *Ambient Air Monitoring for Hexavalent Chromium and Metals in Barrio Logan: May 2001 through May 2002.* ARB, Monitoring and Laboratory Division (October 14, 2003)
- *Draft Barrio Logan Report.* ARB, Planning and Technical Support Division (November 2004)
- *Proposed Amendments to the Hexavalent Chromium Control Measure for Decorative and Hard Chrome Plating and Chromic Acid Anodizing Facilities.* ARB (April 1998)
- Murchison, Linda; Suer, Carolyn; Cook, Jeff. *"Neighborhood Scale Monitoring in Barrio Logan," (*AWMA Annual Conference Proceedings, June 2003)

Dry Cleaners Using Perchloroethylene (Perc Dry Cleaners)

Perchloroethylene (perc) is the solvent most commonly used by the dry cleaning industry to clean clothes or other materials. The ARB and other public health agencies have identified perc as a potential cancer-causing compound. Perc persists in the atmosphere long enough to contribute to both regional air pollution and localized exposures. Perc dry cleaners are the major source of perc emissions in California.

Since 1990, the statewide concentrations and health risk from exposure to perc has dropped over 70 percent. This is due to a number of regulatory requirements on perc dry cleaners and other sources, including degreasing operations, brake cleaners, and adhesives. ARB adopted an Airborne Toxic Control Measure (ATCM) for Perc Emissions from Dry Cleaning Operations in 1993. ARB has also prohibited the use of perc in aerosol adhesives and automotive brake cleaners.

Perc dry cleaners statewide are required to comply with ARB and local air district regulations to reduce emissions. However, even with these controls, some emissions continue to occur. Air quality studies indicate that there is still the potential for significant risks even near well-controlled dry cleaners. The South Coast AQMD has adopted a rule requiring that all new dry cleaners use alternatives to perc and that existing dry cleaners phase out the use of perc by December 2020. Over time, transition to non-toxic alternatives should occur. However, while perc continues to be used, a preventative approach should be taken to siting of new sensitive land uses.

Key Health Findings

Inhalation of perc may result in both cancer and non-cancer health effects. An assessment by California's Office of Environmental Health Hazard Assessment (OEHHA) concluded that perc is a potential human carcinogen and can cause non-cancer health effects. In addition to the potential cancer risk, the effects of long-term exposure include dizziness, impaired judgment and perception, and damage to the liver and kidneys. Workers have shown signs of liver toxicity following chronic exposure to perc, as well as kidney dysfunction and neurological effects. Non-cancer health effects occur with higher exposure levels than those associated with significant cancer risks. The public is more likely to be exposed to perchloroethylene at levels causing significant cancer risks than to levels causing non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected. The ARB formally identified perc as a toxic air contaminant in October 1991.

One study has determined that inhalation of perc is the predominant route of exposure to infants living in apartments co-located in the same building with a business operating perc dry cleaning equipment. Results of air sampling within co-residential buildings indicate that dry cleaners can cause a wide range of exposures depending on the type and maintenance of the equipment. For example, a well-maintained state-of-the-art system may have risks in the range of 10 in one million, whereas a badly maintained machine with major leaks can have potential cancer risks of thousands in one million.

The California Air Pollution Control Officers Association (CAPCOA) is developing Industry-wide Risk Assessment Guidelines for Perchloroethylene Dry Cleaners which, when published, will provide detailed information on public health risk from exposure to emissions from this source.

Distance Related Findings

Risk created by perc dry cleaning is dependent on the amount of perc emissions, the type of dry cleaning equipment, proximity to the source, and how the emissions are released and dispersed (e.g., type of ventilation system, stack parameters, and local meteorology). Dry cleaners are often located near

residential areas, and near shopping centers, schools, day-care centers, and restaurants.

The vast majority of dry cleaners in California have one dry cleaning machine per facility. The South Coast AQMD estimates that an average well-controlled dry cleaner uses about 30 to 160 gallons of cleaning solvent per year, with an average of about 100 gallons. Based on these estimates, the South Coast AQMD estimates a potential cancer risk between 25 to 140 in one million at residential locations 75 feet or less from the dry cleaner, with an average of about 80 in one million. The estimate could be as high as 270 in one million for older machines.

CAPCOA's draft industry-wide risk assessment of perc dry cleaning operations indicates that the potential cancer risk for many dry cleaners may be in excess of potential cancer risk levels adopted by the local air districts. The draft document also indicates that, in general, the public's exposure can be reduced by at least 75 percent, by providing a separation distance of about 300 feet from the operation. This assessment is based on a single machine with perc use of about 100 gallons per year. At these distances, the potential cancer risk would be less than 10 potential cases per million for most scenarios.

The risk would be proportionately higher for large, industrial size, dry cleaners. These facilities typically have two or more machines and use 200 gallons or more per year of perc. Therefore, separation distances need to be greater for large dry cleaners. At a distance of 500 feet, the remaining risk for a large plant can be reduced by over 85 percent.

In California, a small number of dry cleaners that are co-located (sharing a common wall, floor, or ceiling) with a residence have the potential to expose the inhabitants of the residence to high levels of perc. However, while special requirements have been imposed on these existing facilities, the potential for exposure still exists. Avoiding these siting situations in the future is an important preventative measure.

Local air districts are a source of information regarding specific dry cleaning operations—particularly for large industrial operations with multiple machines. The 300 foot separation recommended below reflects the most common situation – a dry cleaner with only one machine. While we recommend 500 feet when there are two or more machines, site specific information should be obtained from the local air district for some very large industrial operations. Factors that can impact the risk include the number and type of machines, controls used, source configuration, building dimensions, terrain, and meteorological data.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines provide 500 feet. For operations with 3 or more machines, consult with the local air district.

- Do not site new sensitive land uses in the same building with perc dry cleaning operations.

References

- *Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems,* Final Staff Report. South Coast AQMD. (October 2002)
- *Air Toxic Control Measure for Emissions of Perchloroethylene from Dry Cleaning Operations.* ARB (1994) (http://www.arb.ca.gov/toxics/atcm/percatcm.htm)
- *"An Assessment of Tetrachloroethylene in Human Breast Milk"*, Judith Schreiber, New York State Department of Health – Bureau of Toxic Substance Assessment, Journal of Exposure Analysis and Environmental Epidemiology, Vol.2, Suppl.2, pp. 15-26, 1992.
- Draft *Air Toxics "Hot Spots" Program Perchloroethylene Dry Cleaner Industry-wide Risk Assessment Guidelines.* (CAPCOA (November 2002)
- *Final Environmental Assessment for Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems.* South Coast AQMD. (October 18, 2002)

Gasoline Dispensing Facilities

Refueling at gasoline dispensing facilities releases benzene into the air. Benzene is a potent carcinogen and is one of the highest risk air pollutants regulated by ARB. Motor vehicles and motor vehicle-related activity account for over 90 percent of benzene emissions in California. While gasoline-dispensing facilities account for a small part of total benzene emissions, near source exposures for large facilities can be significant.

Since 1990, benzene in the air has been reduced by over 75 percent statewide, primarily due to the implementation of emissions controls on motor vehicle vapor recovery equipment at gas stations, and a reduction in benzene levels in gasoline. However, benzene levels are still significant. In urban areas, average benzene exposure is equivalent to about 50 in one million.

Gasoline dispensing facilities tend to be located in areas close to residential and shopping areas. Benzene emissions from the largest gas stations may result in near source health risk beyond the regional background and district health risk thresholds. The emergence of very high gasoline throughput at large retail or

wholesale outlets makes this a concern as these types of outlets are projected to account for an increasing market share in the next few years.

Key Health Findings

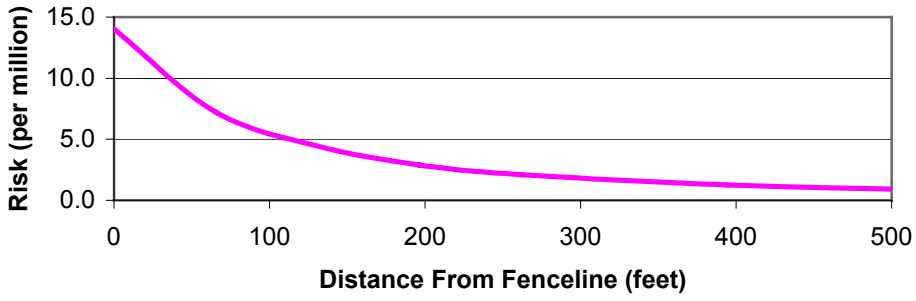
Benzene is a human carcinogen identified by ARB as a toxic air contaminant. Benzene also can cause non-cancer health effects above a certain level of exposure. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. It is unlikely that the public would be exposed to levels of benzene from gasoline dispensing facilities high enough to cause these non-cancer health effects.

Distance Related Findings

A well-maintained vapor recovery system can decrease emissions of benzene by more than 90% compared with an uncontrolled facility. Almost all facilities have emission control systems. Air quality modeling of the health risks from gasoline dispensing facilities indicate that the impact from the facilities decreases rapidly as the distance from the facility increases.

Statistics reported in the ARB's staff reports on Enhanced Vapor Recovery released in 2000 and 2002, indicated that almost 96 percent of the gasoline dispensing facilities had a throughput less than 2.4 million gallons per year. The remaining four percent, or approximately 450 facilities, had throughputs exceeding 2.4 million gallons per year. For these stations, the average gasoline throughput was 3.6 million gallons per year.

Figure 1-6
Gasoline Dispensing Facility Health Risk
for 3,600,000 gal/yr throughput



As shown in Figure 1-6, the risk levels for a gasoline dispensing facility with a throughput of 3.6 million gallons per year is about 10 in one million at a distance of 50 feet from the fenceline. However, as the throughput increases, the potential risk increases.

As mentioned above, air pollution levels in the immediate vicinity of large gasoline dispensing facilities may be higher than the surrounding area (although tailpipe emissions from motor vehicles dominates the health impacts). Very large gasoline dispensing facilities located at large wholesale and discount centers may dispense nine million gallons of gasoline per year or more. At nine million gallons, the potential risk could be around 25 in one million at 50 feet, dropping to about five in one million at 300 feet. Some facilities have throughputs as high as 19 million gallons.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

References

- *Gasoline Service Station Industry-wide Risk Assessment Guidelines.* California Air Pollution Control Officers Association (December 1997 and revised November 1, 2001)
- *Staff Report on Enhanced Vapor Recovery.* ARB (February 4, 2000)
- *The California Almanac of Emissions and Air Quality.* ARB (2004)
- *Staff Report on Enhanced Vapor Recovery Technology Review.* ARB (October 2002)

Other Facility Types that Emit Air Pollutants of Concern

In addition to source specific recommendations, Table 1-3 includes a list of other industrial sources that could pose a significant health risk to nearby sensitive individuals depending on a number of factors. These factors include the amount of pollutant emitted and its toxicity, the distance to nearby individuals, and the type of emission controls in place. Since these types of facilities are subject to air permits from local air districts, facility specific information should be obtained where there are questions about siting a sensitive land use close to an industrial facility.

Potential Sources of Odor and Dust Complaints

Odors and dust from commercial activities are the most common sources of air pollution complaints and concerns from the public. Land use planning and permitting processes should consider the potential impacts of odor and dust on surrounding land uses, and provide for adequate separation between odor and dust sources. As with other types of air pollution, a number of factors need to be considered when determining an adequate distance or mitigation to avoid odor or

Table 1-3 – Examples of Other Facility Types That Emit[1] Air Pollutants of Concern

Categories	Facility Type	Air Pollutants of Concern
Commercial		
	Autobody Shops	Metals, Solvents
	Furniture Repair	Solvents[2], Methylene Chloride
	Film Processing Services	Solvents, Perchloroethylene
	Distribution Centers	Diesel Particulate Matter
	Printing Shops	Solvents
	Diesel Engines	Diesel Particulate Matter
Industrial		
	Construction	Particulate Matter, Asbestos
	Manufacturers	Solvents, Metals
	Metal Platers, Welders, Metal Spray (flame spray) Operations	Hexavalent Chromium, Nickel, Metals
	Chemical Producers	Solvents, Metals
	Furniture Manufacturers	Solvents
	Shipbuilding and Repair	Hexavalent chromium and other metals, Solvents
	Rock Quarries and Cement Manufacturers	Particulate Matter, Asbestos
	Hazardous Waste Incinerators	Dioxin, Solvents, Metals
	Power Plants	Benzene, Formaldehyde, Particulate Matter
	Research and Development Facilities	Solvents, Metals, etc.
Public		
	Landfills	Benzene, Vinyl Chloride, Diesel Particulate Matter
	Waste Water Treatment Plants	Hydrogen Sulfide
	Medical Waste Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
	Recycling, Garbage Transfer Stations	Diesel Particulate Matter
	Municipal Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
Transportation		
	Truck Stops	Diesel Particulate Matter
Agricultural Operations		
	Farming Operations	Diesel Particulate Matter, VOCs, NOx, PM10, CO, SOx, Pesticides
	Livestock and Dairy Operations	Ammonia, VOCs, PM10

[1]Not all facilities will emit pollutants of concern due to process changes or chemical substitution. Consult the local air district regarding specific facilities.
[2]Some solvents may emit toxic air pollutants, but not all solvents are toxic air contaminants.

dust complaints in a specific situation. Local air districts should be consulted for advice when these siting situations arise.

Table 1-4 lists some of the most common sources of odor complaints received by local air districts. Complaints about odors are the responsibility of local air districts and are covered under state law. The types of facilities that can cause odor complaints are varied and can range from small commercial facilities to large industrial facilities, and may include waste disposal and recycling operations. Odors can cause health symptoms such as nausea and headache. Facilities with odors may also be sources of toxic air pollutants (See Table 1-3). Some common sources of odors emitted by facilities are sulfur compounds, organic solvents, and the decomposition/digestion of biological materials. Because of the subjective nature of an individual's sensitivity to a particular type of odor, there is no specific rule for assigning appropriate separations from odor sources. Under the right meteorological conditions, some odors may still be offensive several miles from the source.

Table 1-4
Sources of Odor Complaints

- Sewage Treatment Plants
- Landfills
- Recycling Facilities
- Waste Transfer Stations
- Petroleum Refineries
- Biomass Operations
- Autobody Shops
- Coating Operations
- Fiberglass Manufacturing
- Foundries
- Rendering Plants
- Livestock Operations

Sources of dust are also common sources of air pollution-related complaints. Operations that can result in dust problems are rock crushing, gravel production, stone quarrying, and mining operations. A common source of complaints is the dust and noise associated with blasting that may be part of these operations. Besides the health impacts of dust as particulate matter, thick dust also impairs visibility, aesthetic values, and can soil homes and automobiles. Local air districts typically have rules for regulating dust sources in their jurisdictions, but dust sources can still be a concern. Therefore, separation of these facilities from residential and other new sensitive land uses should be considered.

In some areas of California, asbestos occurs naturally in stone deposits. Asbestos is a potent carcinogenic substance when inhaled. Asbestos-containing dust may be a public health concern in areas where asbestos-containing rock is mined, crushed, processed, or used. Situations where asbestos-containing gravel has been used in road paving materials are also a source of asbestos exposure to the general public. Planners are advised to consult with local air pollution agencies in areas where asbestos-containing gravel or stone products are produced or used.

2. Handbook Development

ARB and local air districts share responsibility for improving statewide air quality. As a result of California's air pollution control programs, air quality has improved and health risk has been reduced statewide. However, state and federal air quality standards are still exceeded in many areas of California and the statewide health risk posed by toxic air contaminants (air toxics) remains too high. Also, some communities experience higher pollution exposures than others - making localized impacts, as well regional or statewide impacts, an important consideration. It is for this reason that this Handbook has been produced - to promote better, more informed decision-making by local land use agencies that will improve air quality and public health in their communities.

Land use policies and practices, including planning, zoning, and siting activities, can play a critical role in air quality and public health at the local level. For instance, even with the best available control technology, some projects that are sited very close to homes, schools, and other public places can result in elevated air pollution exposures. The reverse is also true – siting a new school or home too close to an existing source of air pollution can pose a public health risk. The ARB recommendations in section 1 address this issue.

> *This Handbook is an informational document that we hope will strengthen the relationship between air quality and land use agencies. It highlights the need for land use agencies to address the potential for new projects to result in localized health risk or contribute to cumulative impacts where air pollution sources are concentrated.*

Avoiding these incompatible land uses is a key to reducing localized air pollution exposures that can result in adverse health impacts, especially to sensitive individuals.

Individual siting decisions that result in incompatible land uses are often the result of locating "sensitive" land uses next to polluting sources. These decisions can be of even greater concern when existing air pollution exposures in a community are considered. In general terms, this is often referred to as the issue of "cumulative impacts." ARB is working with local air districts to better define these situations and to make information about existing air pollution levels (e.g., from local businesses, motor vehicles, and other areawide sources) more readily available to land use agencies.

In December 2001, the ARB adopted "Policies and Actions for Environmental Justice" (Policies). These Policies were developed in coordination with a group of stakeholders, representing local government agencies, community interest

groups, environmental justice organizations, academia, and business (Environmental Justice Stakeholders Group).

The Policies included a commitment to work with land use planners, transportation agencies, and local air districts to develop ways to identify, consider, and reduce cumulative air pollution emissions, exposure, and health risks associated with land use planning and decision-making. Developed under the auspices of the ARB's Environmental Justice Stakeholders Group, this Handbook is a first step in meeting that commitment.

ARB has produced this Handbook to help achieve several objectives:

- Provide recommendations on situations to avoid when siting new residences, schools, day care centers, playgrounds, and medical-related facilities (sensitive sites or sensitive land uses);

- Identify approaches that land use agencies can use to prevent or reduce potential air pollution impacts associated with general plan policies, new land use development, siting, and permitting decisions;

- Improve and facilitate access to air quality data and evaluation tools for use in the land use decision-making process;

- Encourage stronger collaboration between land use agencies and local air districts to reduce community exposure to source-specific and cumulative air pollution impacts; and

- Emphasize community outreach approaches that promote active public involvement in the air quality/land use decision-making process.

This Handbook builds upon California's 2003 General Plan Guidelines. These Guidelines, developed by the Governor's Office of Planning and Research (OPR), explain the land use planning process and applicable legal requirements. This Handbook also builds upon a 1997 ARB report, "The Land Use-Air Quality Linkage" ("Linkage Report").[9] The Linkage Report was an outgrowth of the California Clean Air Act which, among other things, called upon local air districts to focus particular attention on reducing emissions from sources that indirectly cause air pollution by attracting vehicle trips. Such indirect sources include, but are not limited to, shopping centers, schools and universities, employment centers, warehousing, airport hubs, medical offices, and sports arenas. The Linkage Report summarizes data as of 1997 on the relationships between land use, transportation, and air quality, and highlights strategies that can help to reduce the use of single occupancy automobile use. Such strategies

[9] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

complement ARB regulatory programs that continue to reduce motor vehicle emissions.

In this Handbook, we identify types of air quality-related information that we recommend land use agencies consider in the land use decision-making processes such as the development of regional, general, and community plans; zoning ordinances; environmental reviews; project siting; and permit issuance. The Handbook provides recommendations on the siting of new sensitive land uses based on current analyses. It also contains information on approaches and methodologies for evaluating new projects from an air pollution perspective.

The Handbook looks at air quality issues associated with emissions from industrial, commercial, and mobile sources of air pollution. Mobile sources continue to be the largest overall contributors to the state's air pollution problems, representing the greatest air pollution health risk to most Californians. Based on current health risk information for air toxics, the most serious pollutants on a statewide basis are diesel PM, benzene, and 1,3-butadiene, all of which are primarily emitted by motor vehicles. From a state perspective, ARB continues to pursue new strategies to further reduce motor vehicle-related emissions in order to meet air quality standards and reduce air toxics risk.

While mobile sources are the largest overall contributors to the state's air pollution problems, industrial and commercial sources can also pose a health risk, particularly to people near the source. For this reason, the issue of incompatible land uses is an important focus of this document.

Handbook Audience

Even though the primary users of the Handbook will likely be agencies responsible for air quality and land use planning, we hope the ideas and technical issues presented in this Handbook will also be useful for:

- public and community organizations and community residents;
- federal, state and regional agencies that fund, review, regulate, oversee, or otherwise influence environmental policies and programs affected by land use policies; and
- private developers.

3. Key Community Focused Issues Land Use Agencies Should Consider

Two key air quality issues that land use agencies should consider in their planning, zoning, and permitting processes are:

1) **Incompatible Land Uses.** Localized air pollution impacts from incompatible land use can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes.

2) **Cumulative Impacts.** Cumulative air pollution impacts can occur from a concentration of multiple sources that individually comply with air pollution control requirements or fall below risk thresholds, but in the aggregate may pose a public health risk to exposed individuals. These sources can be heavy or light-industrial operations, commercial facilities such as autobody shops, large gas dispensing facilities, dry cleaners, and chrome platers, and freeways or other nearby busy transportation corridors.

Incompatible Land Uses

Land use policies and practices can worsen air pollution exposure and adversely affect public health by mixing incompatible land uses. Examples include locating new sensitive land uses, such as housing or schools, next to small metal plating facilities that use a highly toxic form of chromium, or very near large industrial facilities or freeways. Based on recent monitoring and health-based studies, we now know that air quality impacts from incompatible land uses can contribute to increased risk of illness, missed work and school, a lower quality of life, and higher costs for public health and pollution control.[10]

Avoiding incompatible land uses can be a challenge in the context of mixed-use industrial and residential zoning. For a variety of reasons, government agencies and housing advocates have encouraged the proximity of affordable housing to employment centers, shopping areas, and transportation corridors, partially as a means to reduce vehicle trips and their associated emissions. Generally speaking, typical distances in mixed-use communities between businesses and industries and other land uses such as homes and schools, should be adequate to avoid health risks. However, generalizations do not always hold as we addressed in section 1 of this Handbook.

In terms of siting air pollution sources, the proposed location of a project is a major factor in determining whether it will result in localized air quality impacts. Often, the problem can be avoided by providing an adequate distance or setback

[10] For more information, the reader should refer to ARB's website on community health: http://www.arb.ca.gov/ch/ch.htm

between a source of emissions and nearby sensitive land uses. Sometimes, suggesting project design changes or mitigation measures in the project review phase can also reduce or avoid potential impacts. This underscores the importance of addressing potential incompatible land uses as early as possible in the project review process, ideally in the general plan itself.

Cumulative Air Pollution Impacts

The broad concept of cumulative air pollution impacts reflects the combination of regional air pollution levels and any localized impacts. Many factors contribute to air pollution levels experienced in any location. These include urban background air pollution, historic land use patterns, the prevalence of freeways and other transportation corridors, the concentration of industrial and commercial businesses, and local meteorology and terrain.

When considering the potential air quality impacts of polluting sources on individuals, project location and the concentration of emissions from air pollution sources need to be considered in the land use decision-making process. In section 4, the Handbook offers a series of questions that helps land use agencies determine if a project should undergo a more careful analysis. This holds true regardless of whether the project being sited is a polluting source or a sensitive land use project.

Large industrial areas are not the only land uses that may result in public health concerns in mixed-use communities. Cumulative air pollution impacts can also occur if land uses do not adequately provide setbacks or otherwise protect sensitive individuals from potential air pollution impacts associated with nearby light industrial sources. This can occur with activities such as truck idling and traffic congestion, or from indirect sources such as warehousing facilities that are located in a community or neighborhood.

In October 2004, Cal/EPA published its Environmental Justice Action Plan. In February 2005, the Cal/EPA Interagency Working Group approved a working definition of "cumulative impacts" for purposes of initially guiding the pilot projects that are being conducted pursuant to that plan. Cal/EPA is now in the process of developing a Cumulative Impacts Assessment Guidance document. Cal/EPA will revisit the working definition of "cumulative impacts" as the Agency develops that guidance. The following is the working definition:

> *"Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socio-economic factors, where applicable, and to the extent data are available."*

4. Mechanisms for Integrating Localized Air Quality Concerns Into Land Use Processes

Land use agencies should use each of their existing planning, zoning, and permitting authorities to address the potential health risk associated with new projects. Land use-specific mechanisms can go a long way toward addressing both localized and cumulative impacts from new air pollution sources that are not otherwise addressed by environmental regulations. Likewise, close collaboration and communication between land use agencies and local air districts in both the planning and project approval stages can further reduce these impacts. Local agency partnerships can also result in early identification of potential impacts from proposed activities that might otherwise escape environmental review. When this happens, pollution problems can be prevented or reduced before projects are approved, when it is less complex and expensive to mitigate.

The land use entitlement process requires a series of planning decisions. At the highest level, the General Plan sets the policies and direction for the jurisdiction, and includes a number of mandatory elements dealing with issues such as housing, circulation, and health hazards. Zoning is the primary tool for implementing land use policies. Specific or community plans created in conjunction with a specific project also perform many of the same functions as a zoning ordinance. Zoning can be modified by means of variances and conditional use permits. The latter are frequently used to insure compatibility between otherwise conflicting land uses. Finally, new development usually requires the approval of a parcel or tract map before grading and building permits can be issued. These parcel or tract maps must be consistent with the applicable General Plan, zoning and other standards.

Land use agencies can use their planning authority to separate industrial and residential land uses, or to require mitigation where separation is not feasible. By separating incompatible land uses, land use agencies can prevent or reduce both localized and cumulative air pollution impacts without denying what might otherwise be a desirable project.[11] For instance:

- a dry cleaner could open a storefront operation in a community with actual cleaning operations performed at a remote location away from residential areas;
- gas dispensing facilities with lower fuel throughput could be sited in mixed-use areas;
- enhanced building ventilation or filtering systems in schools or senior care centers can reduce ambient air from nearby busy arterials; or
- landscaping and regular watering can be used to reduce fugitive dust at a building construction site near a school yard.

[11] It should be noted that such actions should also be considered as part of the General Plan or Plan element process.

The following general and specific land use approaches can help to reduce potential adverse air pollution impacts that projects may have on public health.

General Plans

The primary purpose of planning, and the source of government authority to engage in planning, is to protect public health, safety, and welfare. In its most basic sense, a local government General Plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, forming the basis for most land use decisions. Therefore, the most effective mechanism for dealing with the central land use concept of compatibility and its relationship to cumulative air pollution impacts is the General Plan. Well before projects are proposed within a jurisdiction, the General Plan sets the stage for where projects can be sited, and their compatibility with comprehensive community goals, objectives, and policies.

In 2003, OPR revised its General Plan Guidelines, highlighting the importance of incorporating sustainable development and environmental justice policies in the planning process. The OPR General Plan Guidelines provides an effective and long-term approach to reduce cumulative air pollution impacts at the earliest planning stages. In light of these important additions to the Guidelines, land use agencies should consider updating their General Plans or Plan elements to address these revisions.

The General Plan and related Plan elements can be used to avoid incompatible land uses by incorporating air quality considerations into these documents. For instance, a General Plan safety element with an air quality component could be used to incorporate policies or objectives that are intended to protect the public from the potential for facility breakdowns that may result in a dangerous release of air toxics. Likewise, an air quality component to the transportation circulation element of the General Plan could include policies or standards to prevent or reduce local exposure to diesel exhaust from trucks and other vehicles. For instance, the transportation circulation element could encourage the construction of alternative routes away from residential areas for heavy-duty diesel trucks. By considering the relationship between air quality and transportation, the circulation element could also include air quality policies to prevent or reduce trips and travel, and thus vehicle emissions. Policies in the land use element of the General Plan could identify areas appropriate for future industrial, commercial, and residential uses. Such policies could also introduce design and distance parameters that reduce emissions, exposure, and risk from industrial and some commercial land uses (e.g., dry cleaners) that are in close proximity to residential areas or schools.

Land use agencies should also consider updating or creating an air quality element in the jurisdiction's General Plan. In the air quality element, local decision-makers could develop long-term, effective plans and policies to address

air quality issues, including cumulative impacts. The air quality element can also provide a general reference guide that informs local land use planners about regional and community level air quality, regulatory air pollution control requirements and guidelines, and references emissions and pollution source data bases and assessment and modeling tools. As is further described in Appendix C of the Handbook, new assessment tools that ARB is developing can be included into the air quality element by reference. For instance, ARB's statewide risk maps could be referenced in the air quality element as a resource that could be consulted by developers or land use agencies

Zoning

The purpose of "zoning" is to separate different land uses. Zoning ordinances establish development controls to ensure that private development takes place within a given area in a manner in which:

- All uses are compatible (e.g., an industrial plant is not permitted in a residential area);
- Common development standards are used (e.g., all homes in a given area are set back the same minimum distance from the street); and,
- Each development does not unreasonably impose a burden upon its neighbors (e.g., parking is required on site so as not to create neighborhood parking problems).

To do this, use districts called "zones" are established and standards are developed for these zones. The four basic zones are residential, commercial, industrial and institutional.

Land use agencies may wish to consider how zoning ordinances, particularly those for mixed-use areas, can be used to avoid exacerbating poor land use practices of the past or contributing to localized and cumulative air pollution impacts in the community.

Sometimes, especially in mixed-use zones, there is a potential for certain categories of existing businesses or industrial operations to result in cumulative air pollution impacts to new development projects. For example:

- An assisted living project is proposed for a mixed-use zone adjacent to an existing chrome plating facility, or several dry cleaners;
- Multiple industrial sources regulated by a local air district are located directly upwind of a new apartment complex;
- A new housing development is sited in a mixed-use zone that is downwind or adjacent to a distribution center that attracts diesel-fueled delivery trucks and TRUs; or
- A new housing development or sensitive land use is sited without adequate setbacks from an existing major transportation corridor or rail yard.

As part of the public process for making zoning changes, local land use agencies could work with community planning groups, local businesses, and community residents to determine how best to address existing incompatible land uses.

Land Use Permitting Processes

■ Questions to Consider When Reviewing New Projects

Very often, just knowing what questions to ask can yield critical information about the potential air pollution impacts of proposed projects – both from the perspective of a specific project as well as in the nature of existing air pollution sources in the same impact area. Available land use information can reveal the proximity of air pollution sources to sensitive individuals, the potential for incompatible land uses, and the location and nature of nearby air pollution sources. Air quality data, available from the ARB and local air districts, can provide information about the types and amounts of air pollution emitted in an area, regional air quality concentrations, and health risk estimates for specific sources.

General Plans and zoning maps are an excellent starting point in reviewing project proposals for their potential air pollution impacts. These documents contain information about existing or proposed land uses for a specific location as well as the surrounding area. Often, just looking at a map of the proposed location for a facility and its surrounding area will help to identify a potential adjacent incompatible land use.

The following pages are a “pull-out” list of questions to consider along with cross-references to pertinent information in the Handbook. These questions are intended to assist land use agencies in evaluating potential air quality-related concerns associated with new project proposals.

The first group of questions contains project-related queries designed to help identify the potential for localized project impacts, particularly associated with incompatible land uses. The second group of questions focuses on the issue of potential cumulative impacts by including questions about existing emissions and air quality in the community, and community feedback. Depending on the answers to these questions, a land use agency may decide a more detailed review of the proposal is warranted.

The California Department of Education has already developed a detailed process for school siting which is outlined in Appendix E. However, school districts may also find this section helpful when evaluating the most appropriate site for new schools in their area. At a minimum, using these questions may encourage school districts to engage throughout their siting process with land use agencies and local air districts. The combined expertise of these entities can be useful in devising relevant design standards and mitigation measures that can

reduce exposure to cumulative emissions, exposure, and health risk to students and school workers.

As indicated throughout the Handbook, we strongly encourage land use agencies to consult early and often with local air districts. Local air districts have the expertise, many of the analytical tools, and a working knowledge of the sources they regulate. It is also critical to fully involve the public and businesses that could be affected by the siting decision. The questions provided in the chart below do not imply any particular action should be taken by land use agencies. Rather the questions are intended to improve the assessment process and facilitate informed decision-making.

- **Project-Related Questions**

This section includes project-related questions that, in conjunction with the questions in the next section, can be used to tailor the project evaluation. These questions are designed to help identify the potential for incompatible land uses from localized project impacts.

Questions to Consider When Reviewing New Projects

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
1. Is the proposed project: ▲ A business or commercial license renewal ▲ A new or modified commercial project ▲ A new or modified industrial project ▲ A new or modified public facility project ▲ A new or modified transportation project ▲ A housing or other development in which sensitive individuals may live or play	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Does the proposed project: ▲ Conform to the zoning designation? ▲ Require a variance to the zoning designation? ▲ Include plans to expand operations over the life of the business such that additional emissions may increase the pollution burden in the community (e.g., from additional truck operations, new industrial operations or process lines, increased hours of operation, build-out to the property line, etc.)?	See Appendix F for a general explanation of land use processes. In addition, Section 3 contains a discussion of how land use planning, zoning, and permitting practices can result in incompatible land uses or cumulative air pollution impacts.
3. Has the local air district provided comments or information to assist in the analysis?	See Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.
4. Have public meetings been scheduled with the affected community to solicit their involvement in the decision-making process for the proposed project?	See Section 7 for a discussion of public participation, information and outreach tools.
5. If the proposed project will be subject to local air district regulations: ▲ Has the project received a permit from the local air district? ▲ Would it comply with applicable local air district requirements? ▲ Is the local air district contemplating new regulations that would reduce emissions from the source over time? ▲ Will potential emissions from the project	See Appendix C for a description of local air district programs.

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
trigger the local air district's new source review for criteria pollutants or air toxics emissions? ▲ Is the local air district expected to ask the proposed project to perform a risk assessment? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Are there plans to expand operations over time? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements?	
6. If the proposed project will release air pollution emissions, either directly or indirectly, but is not regulated by the local air district: ▲ Is the local air district informed of the project? ▲ Does the local air district believe that there could be potential air pollution impacts associated with this project category because of the proximity of the project to sensitive individuals? ▲ If the project is one in which individuals live or play (e.g., a home, playground, convalescent home, etc.), does the local air district believe that the project's proximity to nearby sources could pose potential air pollution impacts? ▲ Are there indirect emissions that could be associated with the project (e.g., truck traffic or idling, transport refrigeration unit operations, stationary diesel engine operations, etc.) that will be in close proximity to sensitive individuals? ▲ Will the proposed project increase or serve as a magnet for diesel traffic? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Should the site approval process include identification and mitigation of potential	See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
direct or indirect emissions associated with the potential project?	
7. Does the local air district or land use agency have pertinent information on the source, such as: ▲ Available permit and enforcement data, including for the owner or operator of the proposed source that may have other sources in the State. ▲ Proximity of the proposed project to sensitive individuals. ▲ Number of potentially exposed individuals from the proposed project. ▲ Potential for the proposed project to expose sensitive individuals to odor or other air pollution nuisances. ▲ Meteorology or the prevailing wind patterns between the proposed project and the nearest receptor, or between the proposed sensitive receptor project and sources that could pose a localized or cumulative air pollution impact.	See Appendix C for a description of local air district programs. See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also, do not hesitate to contact your local air district regarding answers to any of these questions that might not be available at the land use agency. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
8. Based upon the project application, its location, and the nature of the source, could the proposed project: ▲ Be a polluting source that is located in proximity to, or otherwise upwind, of a location where sensitive individuals live or play? ▲ Attract sensitive individuals and be located in proximity to or otherwise downwind, of a source or multiple sources of pollution, including polluting facilities or transportation-related sources that contribute emissions either directly or indirectly? ▲ Result in health risk to the surrounding community?	See Section 3 for a discussion of what is an incompatible land use and the potential cumulative air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
9. If a CEQA categorical exemption is proposed, were the following questions considered: ▲ Is the project site environmentally sensitive as defined by the project's location? (A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.) ▲ Would the project and successive future projects of the same type in the approximate location potentially result in cumulative impacts? ▲ Are there "unusual circumstances" creating the possibility of significant effects?	See CEQA Guidelines section 15300, and Public Resources Code, section 21084. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites). See also Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.

- **Questions Related to Cumulative Impact Assessment**

The following questions can be used to provide the decision-maker with a better understanding of the potential for cumulative air pollution impacts to an affected community. Answers to these questions will help to determine if new projects or activities warrant a more detailed review. It may also help to see potential environmental concerns from the perspective of the affected community. Additionally, responses can provide local decision-makers with information with which to assess the best policy options for addressing neighborhood-scale air pollution concerns.

The questions below can be used to identify whether existing tools and procedures are adequate to address land use-related air pollution issues. This process can also be used to pinpoint project characteristics that may have the greatest impact on community-level emissions, exposure, and risk. Such elements can include: the compliance record of existing sources including those owned or operated by the project proponent; the concentration of emissions from polluting sources within the approximate area of sensitive sites; transportation circulation in proximity to the proposed project; compatibility with the General Plan and General Plan elements; etc.

The local air district can provide useful assistance in the collection and evaluation of air quality-related information for some of the questions and should be consulted early in the process.

Questions Related to Cumulative Impact Assessment

Technical Questions	Cross-Reference to Relevant Handbook Sections
1. Is the community home to industrial facilities?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Do one or more major freeways or high-traffic volume surface streets cut through the community?	See transportation circulation element of your general plan. See also Appendix B for useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
3. Is the area classified for mixed-use zoning?	See your general plan and zoning ordinances.
4. Is there an available list of air pollution sources in the community?	Contact your local air district.
5. Has a walk-through of the community been conducted to gather the following information:	See Appendix B for a listing of useful information that land use agencies

Technical Questions	Cross-Reference to Relevant Handbook Sections
▲ Corroborate available information on land use activities in the area (e.g., businesses, housing developments, sensitive individuals, etc.)? ▲ Determine the proximity of existing and anticipated future projects to residential areas or sensitive individuals? ▲ Determine the concentration of emission sources (including anticipated future projects) to residential areas or sensitive individuals?	should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district.
6. Has the local air district been contacted to obtain information on sources in the community?	See Section 7 for a discussion of public participation, information and outreach tools.
7. What categories of commercial establishments are currently located in the area and does the local air district have these sources on file as being regulated or permitted?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants. Also contact your local air district.
8. What categories of indirect sources such as distribution centers or warehouses are currently located in the area?	See Appendix A for typical land use classifications and associated project categories that emit air pollutants.
9. What air quality monitoring data are available?	Contact your local air district.
10. Have any risk assessments been performed on emission sources in the area?	Contact your local air district.
11. Does the land use agency have the capability of applying a GIS spatial mapping tool that can overlay zoning, sub-development information, and other neighborhood characteristics, with air pollution and transportation data?	See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district for tools that can be used to supplement available land use agency tools.
12. Based on available information, is it possible to determine if the affected community or neighborhood experiences elevated health risk due to a concentration of air pollution sources in close proximity, and if not, can the necessary information be obtained?	Contact your local air district. Also see Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
13. Does the community have a history of chronic complaints about air quality?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.
14. Is the affected community included in the public participation process for the agency's decision?	See Section 7 for a discussion of public participation, information and outreach tools.
15. Have community leaders or groups been contacted about any pre-existing or chronic community air quality concerns?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.

- **Mitigation Approaches**

In addition to considering the suitability of the project location, opportunities for mitigation of air pollution impacts should be considered. Sometimes, a land use agency may find that selection of a different project location to avoid a health risk is not feasible. When that happens, land use agencies should consider design improvements or other strategies that would reduce the risk. Such strategies could include performance or design standards, consultation with local air districts and other agencies on appropriate actions that these agencies should, or plan to, undertake, and consultation and outreach in the affected community. Potential mitigation measures should be feasible, cost-effective solutions within the available resources and authority of implementing agencies to enforce.[12]

- **Conditional Use Permits and Performance Standards**

Some types of land uses are only allowed upon approval of a conditional use permit (also called a CUP or special use permit). A conditional use permit does not re-zone the land but specifies conditions under which a particular land use will be permitted. Such land uses could be those with potentially significant environmental impacts. Local zoning ordinances specify the uses for which a conditional use permit is required, the zones they may be allowed in, and public hearing procedures. The conditional use permit imposes special requirements to ensure that the use will not be detrimental to its surroundings.

In the context of land use planning, performance standards are requirements imposed on projects or project categories through conditional use permits to ensure compliance with general plan policies and local ordinances. These standards could apply to such project categories as distribution centers, very large gas dispensing facilities, autobody shops, dry cleaners, and metal platers. Land use agencies may wish to consider adding land use-based performance standards to zoning ordinances in existing mixed-use communities for certain air pollution project categories. Such standards would provide certainty and equitable treatment to all projects of a similar nature, and reserve the more resource intensive conditional or special use permits to projects that require a more detailed analysis. In developing project design or performance standards, land use agencies should consult with the local air district. Early and regular consultation can avoid duplication or inconsistency with local air district control requirements when considering the site-specific design and operation of a project.

[12] A land use agency has the authority to condition or deny a project based upon information collected and evaluated through the land use decision-making process. However, any denial would need to be based upon identifiable, generally applicable, articulated standards set forth in the local government's General Plan and zoning codes. One way of averting this is to conduct early and regular outreach to the community and the local air district so that community and environmental concerns can be addressed and accommodated into the project proposal.

Examples of land use-based air quality-specific performance standards include the following:

- Placing a process vent away from the direction of the local playground that is nearby or increasing the stack height so that emissions are dispersed to reduce the emissions impact on surrounding homes or schools.
- Setbacks between the project fence line and the population center.
- Limiting the hours of operation of a facility to avoid excess emissions exposure or foul odors to nearby individuals.
- An ordinance that requires fleet operators to use cleaner vehicles before project approval (if a new business), or when expanding the fleet (if an existing business); and
- Providing alternate routes for truck operations that discourage detours into residential neighborhoods.

Outreach to Other Agencies

When questions arise regarding the air quality impacts of projects, including potential cumulative impacts, land use agencies should consult the local air district. Land use agencies should also consider the following suggestions to avoid creating new incompatible land uses:

- Consult with the local air district to help determine if emissions from a particular project will adversely impact sensitive individuals in the area, if existing or future effective regulations or permit requirements will affect the proposed project or other sources in the vicinity of the proposed project, or if additional inspections should be required.
- Check with ARB for new information and modeling tools that can help evaluate projects seeking to site within your jurisdiction.
- Become familiar with ARB's Land Use-Air Quality Linkage Report to determine whether approaches and evaluation tools contained in the Report can be used to reduce transportation-related impacts on communities.
- Contact and collaborate with other state agencies that play a role in the land use decision-making process, e.g., the State Department of Education, the California Energy Commission, and Caltrans. These agencies have information on mitigation measures and mapping tools that could be useful in addressing local problems.

- **Information Clearinghouse**

  - Land use agencies can refer to the ARB statewide electronic information clearinghouse for information on what measures other jurisdictions are using to address comparable issues or sources.[13]

[13] This information can be accessed from ARB's website by going to: http://www.arb.ca.gov/ch/clearinghouse.htm

The next section addresses available air quality assessment tools that land use agencies can use to evaluate the potential for localized or cumulative impacts in their communities.

5. Available Tools to Evaluate Cumulative Air Pollution Emissions and Risk

Until recently, California has traditionally approached air pollution control from the perspective of assessing whether the pollution was regional, category-specific, or from new or existing sources. This methodology has been generally effective in reducing statewide and regional air pollution impacts and risk levels. However, such an incremental, category-by-category, source-by-source approach may not always address community health impacts from multiple sources - including mobile, industrial, and commercial facilities.

As a result of air toxics and children's health concerns over the past several years, ARB and local air districts have begun to develop new tools to evaluate and inform the public about cumulative air pollution impacts at the community level. One aspect of ARB's programs now underway is to consolidate and make accessible air toxics emissions and monitoring data by region, using modeling tools and other analytical techniques to take a preliminary look at emissions, exposure, and health risk in communities.

ARB has developed multiple tools to assist local air districts perform assessments of cumulative emissions, exposure, and risk on a neighborhood scale. These tools include:

- Regional risk maps that show trends in potential cancer risk from toxic air pollutants in southern and central California between 1990 and 2010. These maps are based on the U.S. EPA's ASPEN model. These maps provide an estimate of background levels of toxic air pollutant risk but are not detailed enough to assess individual neighborhoods or facilities.[14]

- The Community Health Air Pollution Information System (CHAPIS) is a user-friendly, Internet-based system for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicles. When released in 2004, CHAPIS did not contain information on every source of air pollution or every air pollutant. However, ARB continues to work with local air districts to include all of the largest air pollution sources and those with the highest documented air pollution risk. Additional facilities will be added to CHAPIS as more data become available.[15]

[14] For further information on these maps, please visit ARB's website at: http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm

[15] For further information on CHAPIS, please click on: http://www.arb.ca.gov/ch/chapis1/chapis1.htm

- The Hot Spots Analysis and Reporting Program (HARP) is a software database package that evaluates emissions from one or more facilities to determine the overall health risk posed by the facility(-ies) on the surrounding community. Proper use of HARP ensures that the risk assessment meets the latest risk assessment guidelines published by the State Office of Environmental Health Hazard Assessment (OEHHA). HARP is designed with air quality professionals in mind and is available from the ARB.

- The Urban Emissions Model (URBEMIS) is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses.

Local air districts, and others can use these tools to assess a new project, or plan revision. For example, these tools can be used to:

- Identify if there are multiple sources of air pollution in the community;
- Identify the major sources of air pollution in the area under consideration;
- Identify the background potential cancer risk from toxic air pollution in the area under consideration;
- Estimate the risk from a new facility and how it adds to the overall risk from other nearby facilities; and
- Provide information to decision-makers and key stakeholders on whether there may be significant issues related to cumulative emissions, exposure, and health risk due to a permitting or land use decision.

If an air agency wishes to perform a cumulative air pollution impact analysis using any of these tools, it should consult with the ARB and/or the local air district to obtain information or assistance on the data inputs and procedures necessary to operate the program. In addition, land use agencies could consult with local air districts to determine the availability of land use and air pollution data for entry into an electronic Geographical Information System (GIS) format. GIS is an easier mapping tool than the more sophisticated models described in Appendix C. GIS mapping makes it possible to superimpose land use with air pollution information so that the spatial relationship between air pollution sources, sensitive receptors, and air quality can be visually represented. Appendix C provides a general description of the impact assessment process and micro-scale, or community level modeling tools that are available to evaluate potential cumulative air pollution impacts. Modeling protocols will be accessible on ARB's website as they become available. The ARB will also provide land use agencies and local air districts with statewide regional modeling results and information regarding micro-scale modeling.

6. ARB Programs to Reduce Air Pollution in Communities

ARB's regulatory programs reduce air pollutant emissions through statewide strategies that improve public health in all California communities. ARB's overall program addresses motor vehicles, consumer products, air toxics, air-quality planning, research, education, enforcement, and air monitoring. Community health and environmental justice concerns are a consideration in all these programs. ARB's programs are statewide but recognize that extra efforts may be needed in some communities due to historical mixed land-use patterns, limited participation in public processes in the past, and a greater concentration of air pollution sources in some communities.

ARB's strategies are intended to result in better air quality and reduced health risk to residents throughout California. The ARB's priority is to prevent or reduce the public's exposure to air pollution, including from toxic air contaminants that pose the greatest risk, particularly to infants and children who are more vulnerable to air pollution.

In October 2003, ARB updated its statewide control strategy to reduce emissions from source categories within its regulatory authority. A primary focus of the strategy is to achieve federal and state air quality standards for ozone and particulate matter throughout California, and to reduce health risk from diesel PM. Along with local air districts, ARB will continue to address air toxics emissions from regulated sources (see Table 6-1 for a summary of ARB activities). As indicated earlier, ARB will also provide analytical tools and information to land use agencies and local air districts to help assess and mitigate cumulative air pollution impacts.

The ARB will continue to consider the adoption of or revisions to needed air toxics control measures as part of the state's ongoing air toxics assessment program.[16]

As part of its effort to reduce particulate matter and air toxics emissions from diesel PM, the ARB has developed a Diesel Risk Reduction Program[17] that lays out several strategies in a three-pronged approach to reduce emissions and their associated risk:

- Stringent emission standards for all new diesel-fueled engines;
- Aggressive reductions from in-use engines; and
- Low sulfur fuel that will reduce PM and still provide the quality of diesel fuel needed to control diesel PM.

[16] For continuing information and updates on state measures, the reader can refer to ARB's website at http://www.arb.ca.gov/toxics/toxics.htm.
[17] For a comprehensive description of the program, please refer to ARB's website at http://www.arbB.ca.gov/diesel/dieselrrp.htm.

Table 6-1
ARB ACTIONS TO ADDRESS
CUMULATIVE AIR POLLUTION IMPACTS IN COMMUNITIES

Information Collection

- Improve emission inventories, air monitoring data, and analysis tools that can help to identify areas with high cumulative air pollution impacts
- Conduct studies in coordination with OEHHA on the potential for cancer and non-cancer health effects from air pollutants emitted by specific source categories
- Establish web-based clearinghouse for local land use strategies

Emission Reduction Approaches (2004-2006)*

- Through a public process, consider development and/or amendment of regulations and related guidance to reduce emissions, exposure, and health risk at a statewide and local level for the following sources:
  - Diesel PM sources such as stationary diesel engines, transport refrigeration units, portable diesel engines, on-road public fleets, off-road public fleets, heavy-duty diesel truck idling, harbor craft vessels, waste haulers
  - Other air toxics sources, such as formaldehyde in composite wood products, hexavalent chromium for chrome plating and chromic acid anodizing, thermal spraying, and perchloroethylene dry cleaning
- Develop technical information for the following:*
  - Distribution centers
  - Modeling tools such as HARP and CHAPIS
- Adopt rules and pollution prevention initiatives within legal authority to reduce emissions from mobile sources and fuels, and consumer products
- Develop and maintain Air Quality Handbook as a tool for use by land use agencies and local air districts to address cumulative air pollution impacts

Other Approaches

- Establish guidelines for use of statewide incentive funding for high priority mobile source emission reduction projects

*Because ARB will continue to review the need to adopt or revise statewide measures, the information contained in this chart will be updated on an ongoing basis.

A number of ARB's diesel risk reduction strategies have been adopted. These include measures to reduce emissions from refuse haulers, urban buses, transport refrigeration units, stationary and portable diesel engines, and idling trucks and school buses. These sources are all important from a community perspective.[18]

[18] The reader can refer to ARB's website for information on its mobile source-related programs at: http://www.arb.ca.gov/msprog/msprog.htm, as well as regulations adopted and under consideration as part of the Diesel Risk Reduction Program at: http://www.arb.ca.gov/diesel/dieselrrp.htm

The ARB will continue to evaluate the health effects of air pollutants while implementing programs with local air districts to reduce air pollution in all California communities.

Local air districts also have ambitious programs to reduce criteria pollutants and air toxics from regulated sources in their region. Many of these programs also benefit air quality in local communities as well as in the broader region. For more information on what is being done in your area to reduce cumulative air pollution impacts through air pollution control programs, you should contact your local air district.[19]

[19] Local air district contacts can be found on the inside cover to this Handbook.

7. Ways to Enhance Meaningful Public Participation

Community involvement is an important part of the land use process. The public is entitled to the best possible information about the air they breathe and what is being done to prevent or reduce unhealthful air pollution in their communities. In particular, information on how land use decisions can affect air pollution and public health should be made accessible to all communities, including low-income and minority communities.

Effective community participation consistently relies on a two-way flow of information – from public agencies to community members about opportunities, constraints, and impacts, and from community members back to public officials about needs, priorities, and preferences. The outreach process needed to build understanding and local neighborhood involvement requires data, methodologies, and formats tailored to the needs of the specific community. More importantly, it requires the strong collaboration of local government agencies that review and approve projects and land uses to improve the physical and environmental surroundings of the local community.

Many land use agencies, especially those in major metropolitan areas, are familiar with, and have a long-established public review process. Nevertheless, public outreach can often be improved. Active public involvement requires engaging the public in ways that do not require their previous interest in or knowledge of the land use or air pollution control requirements, and a commitment to taking action where appropriate to address the concerns that are raised.

■ Direct Community Outreach

In conjunction with local air districts, land use agencies should consider designing an outreach program for community groups, other stakeholders, and local government agency staffs that address the problem of cumulative air pollution impacts, and the public and government role in reducing them. Such a program could consider analytical tools that assist in the preparation and presentation of information in a way that supports sensible decision-making and public involvement. Table 7-1 contains some general outreach approaches that might be considered.

Table 7-1
Public Participation Approaches

- Staff and community leadership awareness training on environmental justice programs and community-based issues
- Surveys to identify the website information needs of interested community-based organizations and other stakeholders
- Information materials on local land use and air district authorities
- Community-based councils to facilitate and invite resident participation in the planning process
- Neighborhood CEQA scoping sessions that allows for community input prior to technical analysis
- Public information materials on siting issues are under review including materials written for the affected community, and in different media that widens accessibility
- Public meetings
- Identify other opportunities to include community-based organizations in the process

To improve outreach, local land use agencies should consider the following activities:

- Hold meetings in communities affected by agency programs, policies, and projects at times and in places that encourage public participation, such as evenings and weekends at centrally located community meeting rooms, libraries, and schools.
- Assess the need for and provide translation services at public meetings.
- Hold community meetings to update residents on the results of any special air monitoring programs conducted in their neighborhood.
- Hold community meetings to discuss and evaluate the various options to address cumulative impacts in their community.
- In coordination with local air districts, make staff available to attend meetings of community organizations and neighborhood groups to listen to and, where appropriate, act upon community concerns.
- Establish a specific contact person for environmental justice issues.
- Increase student and community awareness of local government land use activities and policies through outreach opportunities.
- Make air quality and land use information available to communities in an easily understood and useful format, including fact sheets, mailings, brochures, public service announcements, and web pages, in English and other languages.
- On the local government web-site, dedicate a page or section to what the land use program is doing regarding environmental justice and cumulative environmental impacts, and, as applicable, activities conducted with local air districts such as neighborhood air monitoring studies, pollution prevention, air pollution sources in neighborhoods, and risk reduction.

- Allow, encourage, and promote community access to land use activities, including public meetings, General Plan or Community Plan updates, zoning changes, special studies, CEQA reviews, variances, etc.
- Distribute information in multiple languages, as needed, on how to contact the land use agency or local air district to obtain information and assistance regarding environmental justice programs, including how to participate in public processes.
- Create and distribute a simple, easy-to-read, and understandable public participation handbook, which may be based on the "Public Participation Guidebook" developed by ARB.

- **Other Opportunities for Meaningful Public Outreach**

  - Community-Based Planning Committees

  Neighborhood-based or community planning advisory councils could be established to invite and facilitate direct resident participation into the planning process. With the right training and technical assistance, such councils can provide valuable input and a forum for the review of proposed amendments to plans, zone changes, land use permits, and suggestions as to how best to prevent or reduce cumulative air pollution impacts in their community.

  - Regional Partnerships

  Consider creating regional coalitions of key growth-related organizations from both the private and public sectors, with corporations, communities, other jurisdictions, and government agencies. Such partnerships could facilitate agreement on common goals and win-win solutions tailored specifically for the region. With this kind of dialogue, shared vision, and collaboration, barriers can be overcome and locally acceptable sustainable solutions implemented. Over the long term, such strategies will help to bring about clean air in communities as well as regionally.

LAND USE CLASSIFICATIONS AND ASSOCIATED FACILITY CATEGORIES THAT COULD EMIT AIR POLLUTANTS

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
COMMERCIAL/ LIGHT INDUSTRIAL: SHOPPING, BUSINESS, AND COMMERCIAL			
▲ Primarily retail shops and stores, office, commercial activities, and light industrial or small business	Dry cleaners; drive-through restaurants; gas dispensing facilities; auto body shops; metal plating shops; photographic processing shops; textiles; apparel and furniture upholstery; leather and leather products; appliance repair shops; mechanical assembly cleaning; printing shops	VOCs, air toxics, including diesel PM, NOx, CO, SOx	Limited; Rules for applicable equipment
▲ Goods storage or handling activities, characterized by loading and unloading goods at warehouses, large storage structures, movement of goods, shipping, and trucking.	Warehousing; freight-forwarding centers; drop-off and loading areas; distribution centers	VOCs, air toxics, including diesel PM, NOx, CO, SOx	No[v]
LIGHT INDUSTRIAL: RESEARCH AND DEVELOPMENT			
▲ Medical waste at research hospitals and labs	Incineration; surgical and medical instrument manufacturers, pharmaceutical manufacturing, biotech research facilities	Air toxics, NOx, CO, SOx	Yes
▲ Electronics, electrical apparatus, components, and accessories	Computer manufacturer; integrated circuit board manufacturer; semi-conductor production	Air toxics, VOCs	Yes
▲ College or university lab or research center	Medical waste incinerators; lab chemicals handling, storage and disposal	Air toxics, NOx, CO, SOx, PM10	Yes
▲ Research and development labs	Satellite manufacturer; fiber-optics manufacturer; defense contractors; space research and technology; new vehicle and fuel testing labs	Air toxics, VOCs	Yes
▲ Commercial testing labs	Consumer products; chemical handling, storage and disposal	Air toxics, VOCs	Yes

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
INDUSTRIAL: NON-ENERGY-RELATED			
▲ Assembly plants, manufacturing facilities, industrial machinery	Adhesives; chemical; textiles; apparel and furniture upholstery; clay, glass, and stone products production; asphalt materials; cement manufacturers, wood products; paperboard containers and boxes; metal plating; metal and canned food product fabrication; auto manufacturing; food processing; printing and publishing; drug, vitamins, and pharmaceuticals; dyes; paints; pesticides; photographic chemicals; polish and wax; consumer products; metal and mineral smelters and foundries; fiberboard; floor tile and cover; wood and metal furniture and fixtures; leather and leather products; general industrial and metalworking machinery; musical instruments; office supplies; rubber products and plastics production; saw mills; solvent recycling; shingle and siding; surface coatings	VOCs, air toxics, including diesel PM, NOx, PM, CO, SOx	Yes
INDUSTRIAL: ENERGY AND UTILITIES			
▲ Water and sewer operations	Pumping stations; air vents; treatment	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
▲ Power generation and distribution	Power plant boilers and heaters; portable diesel engines; gas turbine engines	NOx, diesel PM, NOx, CO, SOx, PM10, VOCs	Yes
▲ Refinery operations	Refinery boilers and heaters; coke cracking units; valves and flanges; flares	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Oil and gas extraction	Oil recovery systems; uncovered wells	NOx, diesel PM, VOCs, CO, SOx, PM10	Yes
▲ Gasoline storage, transmission, and marketing	Above and below ground storage tanks; floating roof tanks; tank farms; pipelines	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Solid and hazardous waste treatment, storage, and disposal activities.	Landfills; methane digester systems; process recycling facility for concrete and asphalt materials	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
CONSTRUCTION (NON-TRANSPORTATION)			
	Building construction; demolition sites	PM (re-entrained road dust), asbestos, diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; state and federal off-road equipment standards

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
DEFENSE			
	Ordnance and explosives demolition; range and testing activities; chemical production; degreasing; surface coatings; vehicle refueling; vehicle and engine operations and maintenance	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Limited; prescribed burning; equipment and solvent rules
TRANSPORTATION			
▲ Vehicular movement	Residential area circulation systems; parking and idling at parking structures; drive-through establishments; car washes; special events; schools; shopping malls, etc.	VOCs, NOx, PM (re-entrained road dust) air toxics e.g., benzene, diesel PM, formaldehyde, acetaldehyde, 1,3 butadiene, CO, SOx, PM10	No
▲ Road construction and surfacing	Street paving and repair; new highway construction and expansion	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	No
▲ Trains	Railroads; switch yards; maintenance yards	VOCs, NOx, CO, SOx, PM10, air toxics, including diesel PM	Limited; Applicable state and federal MV standards, and possible equipment rules
▲ Marine and port activities	Recreational sailing; commercial marine operations; hotelling operations; loading and un-loading; servicing; shipping operations; port or marina expansion; truck idling		
▲ Aircraft	Takeoff, landing, and taxiing; aircraft maintenance; ground support activities		
▲ Mass transit and school buses	Bus repair and maintenance		
NATURAL RESOURCES			
▲ Farming operations	Agricultural burning; diesel operated engines and heaters; small food processors; pesticide application; agricultural off-road equipment	Diesel PM, VOCs, NOx, PM10, CO, SOx, pesticides	Limited[vi]; Agricultural burning requirements, applicable state and federal mobile source standards; pesticide rules
▲ Livestock and dairy operations	Dairies and feed lots	Ammonia, VOCs, PM10	Yes[vii]
▲ Logging	Off-road equipment e.g., diesel fueled chippers, brush hackers, etc.	Diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; Applicable state/federal mobile source standards
▲ Mining operations	Quarrying or stone cutting; mining; drilling or dredging	PM10, CO, SOx, VOCs, NOx, and asbestos in some geographical areas	Applicable equipment rules and dust controls

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
RESIDENTIAL			
Housing	Housing developments; retirement developments; affordable housing	Fireplace emissions (PM10, NOx, VOCs, CO, air toxics); Water heater combustion (NOx, VOCs, CO)	No[vii]
ACADEMIC AND INSTITUTIONAL			
▲ Schools, including school-related recreational activities	Schools; school yards; vocational training labs/classrooms such as auto repair/painting and aviation mechanics	Air toxics	Yes/No[viii]
▲ Medical waste	Incineration	Air toxics, NOx, CO, PM10	Yes
▲ Clinics, hospitals, convalescent homes		Air toxics	Yes

[i] These classifications were adapted from the American Planning Association's "Land Based Classification Standards." The Standards provide a consistent model for classifying land uses based on their characteristics. The model classifies land uses by refining traditional categories into multiple dimensions, such as activities, functions, building types, site development character, and ownership constraints. Each dimension has its own set of categories and subcategories. These multiple dimensions allow users to have precise control over land-use classifications. For more information, the reader should refer to the Association's website at http://www.planning.org/LBCS/GeneralInfo/.

[ii] This column includes key criteria pollutants and air toxic contaminants that are most typically associated with the identified source categories.

Additional information on specific air toxics that are attributed to facility categories can be found in ARB's Emission Inventory Criteria and Guidelines Report for the Air Toxics Hot Spots Program (May 15, 1997). This information can be viewed at ARB's web site at http://www.arb.ca.gov/ab2588/final96/guide96.pdf.

Criteria air pollutants are those air pollutants for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Criteria pollutants include ozone (formed by the reaction of volatile organic compounds and nitrogen oxides in the presence of sunlight), particulate matter, nitrogen dioxide, sulfur dioxide, carbon monoxide, and lead.

Volatile organic compounds (VOCs) combine with nitrogen oxides to form ozone, as well as particulate matter. VOC emissions result primarily from incomplete fuel combustion and the evaporation of chemical solvents and fuels. On-road mobile sources are the largest contributors to statewide VOC emissions. Stationary sources of VOC emissions include processes that use solvents (such as dry-cleaning, degreasing, and coating operations) and petroleum-related processes (such as petroleum refining, gasoline marketing and dispensing, and oil and gas extraction). Areawide VOC sources include consumer products, pesticides, aerosols and paints, asphalt paving and roofing, and other evaporative emissions.

Nitrogen oxides (NOx) are a group of gaseous compounds of nitrogen and oxygen, many of which contribute to the formation of ozone and particulate matter. Most NOx emissions are produced by the combustion of fuels. Mobile sources make up about 80 percent of the total statewide NOx emissions. Mobile sources include on-road vehicles and trucks, aircraft, trains, ships, recreational boats, industrial and construction equipment, farm

equipment, off-road recreational vehicles, and other equipment. Stationary sources of NOx include both internal and external combustion processes in industries such as manufacturing, food processing, electric utilities, and petroleum refining. Areawide source, which include residential fuel combustion, waste burning, and fires, contribute only a small portion of the total statewide NOx emissions, but depending on the community, may contribute to a cumulative air pollution impact.

Particulate matter (PM) refers to particles small enough to be breathed into the lungs (under 10 microns in size). It is not a single substance, but a mixture of a number of highly diverse types of particles and liquid droplets. It can be formed directly, primarily as dust from vehicle travel on paved and unpaved roads, agricultural operations, construction and demolition.

Carbon monoxide (CO) is a colorless and odorless gas that is directly emitted as a by-product of combustion. The highest concentrations are generally associated with cold stagnant weather conditions that occur during winter. CO problems tend to be localized.

An Air Toxic Contaminant (air toxic) is defined as an air pollutant that may cause or contribute to an increase in mortality or in serous illness, or which may pose a present or potential hazard to human health. Similar to criteria pollutants, air toxics are emitted from stationary, areawide, and mobile sources. They contribute to elevated regional and localized risks near industrial and commercial facilities and busy roadways. The ten compounds that pose the greatest statewide risk are: acetaldehyde; benzene; 1,3-butadiene; carbon tetrachloride; diesel particulate matter (diesel PM); formaldehyde; hexavalent chromium; methylene chloride; para-dichlorobenzene; and perchloroethylene. The risk from diesel PM is by far the largest, representing about 70 percent of the known statewide cancer risk from outdoor air toxics. The exhaust from diesel-fueled engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. Diesel PM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute about 26 percent of statewide diesel PM emissions, with an additional 72 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and other equipment. Stationary engines in shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations contribute about two percent of statewide emissions. However, when this number is disaggregated to a sub-regional scale such as neighborhoods, the risk factor can be far greater.

[iii] The level of pollution emitted is a major determinant of the significance of the impact.

[iv] Indicates whether facility activities listed in column 4 are generally subject to local air district permits to operate. This does not include regulated products such as solvents and degreasers that may be used by sources that may not require an operating permit per se, e.g., a gas station or dry cleaner.

[v] Generally speaking, warehousing or distribution centers are not subject to local air district permits. However, depending on the district, motor vehicle fleet rules may apply to trucks or off-road vehicles operated and maintained by the facility operator. Additionally, emergency generators or internal combustion engines operated on the site may require an operating permit.

[vi] Authorized by recent legislation SB700.

[vii] Local air districts do not require permits for woodburning fireplaces inside private homes. However, some local air districts and land use agencies do have rules or ordinances that require new housing developments or home re-sales to install U.S. EPA –certified stoves. Some local air districts also ban residential woodburning during weather inversions that concentrate smoke in residential areas. Likewise, home water heaters are not subject to permits; however, new heaters could be subject to emission limits that are imposed by federal or local agency regulations.

[viii] Technical training schools that conduct activities normally permitted by a local air district could be subject to an air permit.

LAND USE-BASED REFERENCE TOOLS TO EVALUATE NEW PROJECTS FOR POTENTIAL AIR POLLUTION IMPACTS

Land use agencies generally have a variety of tools and approaches at hand, or accessible from local air districts that can be useful in performing an analysis of potential air pollution impacts associated with new projects. These tools and approaches include:

- Base map of the city or county planning area and terrain elevations.
- General Plan designations of land use (existing and proposed).
- Zoning maps.
- Land use maps that identify existing land uses, including the location of facilities that are permitted or otherwise regulated by the local air district. Land use agencies should consult with their local air district for information on regulated facilities.
- Demographic data, e.g., population location and density, distribution of population by income, distribution of population by ethnicity, and distribution of population by age. The use of population data is a normal part of the planning process. However, from an air quality perspective, socioeconomic data is useful to identify potential community health and environmental justice issues.
- Emissions, monitoring, and risk-based maps created by the ARB or local air districts that show air pollution-related health risk by community across the state.
- Location of public facilities that enhance community quality of life, including parks, community centers, and open space.
- Location of industrial and commercial facilities and other land uses that use hazardous materials, or emit air pollutants. These include chemical storage facilities, hazardous waste disposal sites, dry cleaners, large gas dispensing facilities, auto body shops, and metal plating and finishing shops.
- Location of sources or facility types that result in diesel on-road and off-road emissions, e.g., stationary diesel power generators, forklifts, cranes, construction equipment, on-road vehicle idling, and operation of transportation refrigeration units. Distribution centers, marine terminals and ports, rail yards, large industrial facilities, and facilities that handle bulk goods are all examples of complex facilities where these types of emission sources are frequently concentrated.[1] Very large facilities, such as ports, marine terminals, and airports, could be analyzed regardless of proximity to a receptor if they are within the modeling area.
- Location and zoning designations for existing and proposed schools, buildings, or outdoor areas where sensitive individuals may live or play.
- Location and density of existing and proposed residential development.
- Zoning requirements, property setbacks, traffic flow requirements, and idling restrictions for trucks, trains, yard hostlers[2], construction equipment, or school buses.
- Traffic counts (including diesel truck traffic counts), within a community to validate or augment existing regional motor vehicle trip and speed data.

[1] The ARB is currently evaluating the types of facilities that may act as complex point sources and developing methods to identify them.

[2] Yard hostler means a tractor less than 300 horsepower that is used to transfer semi-truck or tractor-trailer containers in and around storage, transfer, or distribution yards or areas and is often equipped with a hydraulic lifting fifth wheel for connection to trailer containers.

ARB AND LOCAL AIR DISTRICT INFORMATION AND TOOLS CONCERNING CUMULATIVE AIR POLLUTION IMPACTS

It is the ARB's policy to support research and data collection activities toward the goal of reducing cumulative air pollution impacts. These efforts include updating and improving the air toxics emissions inventory, performing special air monitoring studies in specific communities, and conducting a more complete assessment of non-cancer health effects associated with air toxics and criteria pollutants.[1] This information is important because it helps us better understand links between air pollution and the health of sensitive individuals -- children, the elderly, and those with pre-existing serious health problems affected by air quality.

ARB is working with CAPCOA and OEHHA to improve air pollutant data and evaluation tools to determine when and where cumulative air pollution impacts may be a problem. The following provides additional information on this effort.

How are emissions assessed?

Detailed information about the sources of air pollution in an area is collected and maintained by local air districts and the ARB in what is called an emission inventory. Emission inventories contain information about the nature of the business, the location, type and amount of air pollution emitted, the air pollution-producing processes, the type of air pollution control equipment, operating hours, and seasonal variations in activity. Local districts collect emission inventory data for most stationary source categories.

Local air districts collect air pollution emission information directly from facilities and businesses that are required to obtain an air pollution operating permit. Local air districts use this information to compile an emission inventory for areas within their jurisdiction. The ARB compiles a statewide emission inventory based on the information collected by the ARB and local air districts. Local air districts provide most of the stationary source emission data, and ARB provides mobile source emissions as well as some areawide emission sources such as consumer products and paints. ARB is also developing map-based tools that will display information on air pollution sources.

Criteria pollutant data have been collected since the early 1970's, and toxic pollutant inventories began to be developed in the mid-1980's.

[1] A criteria pollutant is any air pollutant for which EPA has established a National Ambient Air Quality Standard or for which California has established a State Ambient Air Quality Standard, including: carbon monoxide, lead, nitrogen oxides, ozone, particulates and sulfur oxides. Criteria pollutants are measured in each of California's air basins to determine whether the area meets or does not meet specific federal or state air quality standards. Air toxics or air toxic contaminants are listed pollutants recognized by California or EPA as posing a potential risk to health.

How is the toxic emission inventory developed?

Emissions data for toxic air pollutants is a high priority for communities because of concerns about potential health effects. Most of ARB's air toxics data is collected through the toxic "Hot Spots" program. Local air districts collect emissions data from industrial and commercial facilities. Facilities that exceed health-based thresholds are required to report their air toxics emissions as part of the toxic "Hot Spots" program and update their emissions data every four years. Facilities are required to report their air toxics emissions data if there is an increase that would trigger the reporting threshold of the hotspots program. Air toxics emissions from motor vehicles and consumer products are estimated by the ARB. These estimates are generally regional in nature, reflecting traffic and population.

The ARB also maintains chemical speciation profiles that can be used to estimate toxics emissions when no toxic emissions data is available.

What additional toxic emissions information is needed?

In order to assess cumulative air pollution impacts, updated information from individual facilities is needed. Even for sources where emissions data are available, additional information such as the location of emissions release points is often needed to better model cumulative impacts. In terms of motor vehicles, emissions data are currently based on traffic models that only contain major roads and freeways. Local traffic data are needed so that traffic emissions can be more accurately assigned to specific streets and roads. Local information is also needed for off-road emission sources, such as ships, trains, and construction equipment. In addition, hourly maximum emissions data are needed for assessing acute air pollution impacts.

What work is underway?

ARB is working with CAPCOA to improve toxic emissions data, developing a community health air pollution information system to improve access to emission information, conducting neighborhood assessment studies to better understand toxic emission sources, and conducting surveys of sources of toxic pollutants.

How is air pollution monitored?

While emissions data identify how much air pollution is going into the air, the state's air quality monitoring network measures air pollutant levels in outdoor air. The statewide air monitoring network is primarily designed to measure regional exposure to air pollutants, and consists of more than 250 air monitoring sites.

The air toxics monitoring network consists of approximately 20 permanent sites. These sites are supplemented by special monitoring studies conducted by ARB and local air districts. These sites measure approximately sixty toxic air pollutants. Diesel PM, which is the major driver of urban air toxic risk, is not monitored directly. Ten of the

60 toxic pollutants, not including diesel, account for most of the remaining potential cancer risk in California urban areas.

What additional monitoring has been done?

Recently, additional monitoring has been done to look at air quality at the community level. ARB's community monitoring was conducted in six communities located throughout the state. Most sites were in low-income, minority communities located near major sources of air pollution, such as refineries or freeways. The monitoring took place for a year or more in each community, and included measurements of both criteria and toxic pollutants.

What is being learned from community monitoring?

In some cases, the ARB or local air districts have performed air quality monitoring or modeling studies covering a particular region of the state. When available, these studies can give information about regional air pollution exposures.

The preliminary results of ARB's community monitoring are providing insights into air pollution at the community level. Urban background levels are a major contributor to the overall risk from air toxics in urban areas, and this urban background tends to mask the differences between communities. When localized elevated air pollutant levels were measured, they were usually associated with local ground-level sources of toxic pollutants. The most common source of this type was busy streets and freeways. The impact these ground-level sources had on local air quality decreased rapidly with distance from the source. Pollutant levels usually returned to urban background levels within a few hundred meters of the source.

These results indicate that tools to assess cumulative impacts must be able to account for both localized, near-source impacts, as well as regional background air pollution. The tools that ARB is developing for this purpose are air quality models.

How can air quality modeling be used?

While air monitoring can directly measure cumulative exposure to air pollution, it is limited because all locations cannot be monitored. To address this, air quality modeling provides the capability to estimate exposure when air monitoring is not feasible. Air quality modeling can be refined to assess local exposure, identify locations of potential hot spots, and identify the relative contribution of emission sources to exposure at specific locations. The ARB has used this type of information to develop regional cumulative risk maps that estimate the cumulative cancer air pollution risk for most of California. While these maps only show one air pollution-related health risk, it does provide a useful starting point.

What is needed for community modeling?

Air quality models have been developed to assess near-source impacts, but they have very exacting data requirements. These near-source models estimate the impact of local sources, but do not routinely include the contribution from regional air pollution background. To estimate cumulative air pollution exposure at a neighborhood scale, a modeling approach needs to combine features of both micro-scale and regional models.

In addition, improved methods are needed to assess near-source impacts under light and variable wind conditions, when high local concentrations are more likely to occur. A method for modeling long-term exposure to air pollutants near freeways and other high traffic areas is also needed.

What modeling work has ARB developed?

A key component of ARB's Community Health Program is the Neighborhood Assessment Program (NAP). As described later in this section, the NAP studies are being conducted to better understand pollution impacts at the community level. Through two such studies conducted in Barrio Logan (San Diego) and Wilmington (Los Angeles), ARB is refining community-level modeling methodologies. Regional air toxics modeling is also being performed to better understand regional air pollution background levels.

In a parallel effort, ARB is developing modeling protocols for estimating cumulative emissions, exposure, and risk from air pollution. The protocols will cover modeling approaches and uncertainties, procedures for running the models, the development of statewide risk maps, and methods for estimating health risks. The protocols are subject to an extensive peer review process prior to release.

How are air pollution impacts on community health assessed?

On a statewide basis, ARB's toxic air contaminant program identifies and reduces public exposure to air toxics. The focus of the program has been on reducing potential cancer risk, because monitoring results show potential urban cancer risk levels are too high. ARB has also looked for potential non-cancer risks based on health reference levels provided by OEHHA. On a regional basis, the pollutants measured in ARB's toxic monitoring network are generally below the OEHHA non-cancer reference exposure levels.

As part of its community health program, the ARB is looking at potential cancer and non-cancer risk. This could include chronic or acute health effects. If the assessment work shows elevated exposures on a localized basis, ARB will work with OEHHA to assess the health impacts.

What tools has ARB developed to assess cumulative air pollution impacts?

ARB has developed the following tools and reports to assist land use agencies and local air districts assess and reduce cumulative emissions, exposure, and risk on a neighborhood scale.

Statewide Risk Maps

ARB has produced regional risk maps that show the statewide trends for Southern and Central California in estimated potential cancer risk from air toxics between 1990 and 2010.[2] These maps will supplement U.S. EPA's ASPEN model and are available on the ARB's Internet site. These maps are best used to obtain an estimate of the regional background air pollution health risk and are not detailed enough to estimate the exact risk at a specific location.

ARB also has maps that focus in more detail on smaller areas that fall within the Southern and Central California regions for these same modeled years. The finest visual resolution available in the maps on this web site is two by two kilometers. These maps are not detailed enough to assess individual neighborhoods or facilities.

Community Health Air Pollution Information System (CHAPIS)

CHAPIS is an Internet-based procedure for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS uses Geographical Information System (GIS) software to deliver interactive maps over the Internet. CHAPIS relies on emission estimates reported to the ARB's emission inventory database - California Emissions Inventory Development and Reporting System, or CEIDARS.

Through CHAPIS, air district staff can quickly and easily identify pollutant sources and emissions within a specified area. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicle and areawide emissions. CHAPIS does not contain information on every source of air pollution or every air pollutant. It is a major long-term objective of CHAPIS to include all of the largest air pollution sources and those with the highest documented air pollution risk. CHAPIS will be updated on a periodic basis and additional facilities will be added to CHAPIS as more data becomes available.

CHAPIS is being developed in stages to assure data quality. The initial release of CHAPIS will include facilities emitting 10 or more tons per year of nitrogen oxides, sulfur dioxide, carbon monoxide, PM10, or reactive organic gases; air toxics from refineries and power plants of 50 megawatts or more; and facilities that conducted health risk

[2]ARB maintains state trends and local potential cancer risk maps that show statewide trends in potential inhalable cancer risk from air toxics between 1990 and 2010. This information can be viewed at ARB's web site at http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm)

assessments under the California Air Toxics "Hot Spots" Information and Assessment Program.[3]

CHAPIS can be used to identify the emission contributions from mobile, area, and point sources on that community.

"Hot Spots" Analysis and Reporting Program (HARP)

HARP[4] is a software package available from the ARB and is designed with air quality professionals in mind. It models emissions and release data from one or more facilities to estimate the potential health risk posed by the selected facilities on the neighboring community. HARP uses the latest risk assessment guidelines published by OEHHA.

With HARP, a user can perform the following tasks:

- Create and manage facility databases;
- Perform air dispersion modeling;
- Conduct health risk analyses;
- Output data reports; and
- Output results to GIS mapping software.

HARP can model downwind concentrations of air toxics based on the calculated emissions dispersion at a single facility. HARP also has the capability of assessing the risk from multiple facilities, and for multiple locations of concern near those facilities. While HARP has the capability to assess multiple source impacts, there had been limited application of the multiple facility assessment function in the field at the time of HARP's debut in 2003. HARP can also evaluate multi-pathway, non-inhalation health risk resulting from air pollution exposure, including skin and soil exposure, and ingestion of meat and vegetables contaminated with air toxics, and other toxics that have accumulated in a mother's breast milk.

Neighborhood Assessment Program (NAP)

The NAP[5] has been a key component of ARB's Community Health Program. It includes the development of tools that can be used to perform assessments of cumulative air pollution impacts on a neighborhood scale. The NAP studies have been done to better understand how air pollution affects individuals at the neighborhood level. Thus far, ARB has conducted neighborhood scale assessments in Barrio Logan and Wilmington.

As part of these studies, ARB is collecting data and developing a modeling protocol that can be used to conduct cumulative air pollution impact assessments. Initially these

[3] California Health & Safety Code section 44300, et seq.
[4] More detailed information can be found on ARB's website at: http://www.arb.ca.gov/toxics/harp/harp.htm
[5] For more information on the Program, please refer to: http://www.arb.ca.gov/ch/programs/nap/nap.htm

assessments will focus on cumulative inhalation cancer health risk and chronic non-cancer impacts. The major challenge is developing modeling methods that can combine both regional and localized air pollution impacts, and identifying the critical data necessary to support these models. The objective is to develop methods and tools from these studies that can ultimately be applied to other areas of the state. In addition, the ARB plans to use these methods to replace the ASPEN regional risk maps currently posted on the ARB Internet site.

Urban Emissions Model (URBEMIS)

URBEMIS[6] is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses. URBEMIS estimates sulfur dioxide emissions from motor vehicles in addition to reactive organic gases, nitrogen oxides, carbon monoxide, and PM10.

Land-Use Air Quality Linkage Report[7]

This report summarizes data currently available on the relationships between land use, transportation and air quality. It also highlights strategies that can help to reduce the use of the private automobile. It also briefly summarizes two ARB-funded research projects. The first project analyzes the travel patterns of residents living in five higher density, mixed use neighborhoods in California, and compares them to travel in more auto-oriented areas. The second study correlates the relationship between travel behavior and community characteristics, such as density, mixed land uses, transit service, and accessibility for pedestrians.

[6] For more information on this model, please refer to ARB's website at http://www.arb.ca.gov/html/soft.htm.

[7] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

LAND USE AND AIR QUALITY AGENCY ROLES IN THE LAND USE PROCESS

A wide variety of federal, state, and local government agencies are responsible for regulatory, planning, and siting decisions that can have an impact on air pollution. They include local land use agencies, regional councils of government, school districts, local air districts, ARB, the California Department of Transportation (Caltrans), and the Governor's Office of Planning and Research (OPR) to name a few. This Section will focus on the roles and responsibilities of local and state agencies. The role of school districts will be discussed in Appendix E.

Local Land Use Agencies

Under the State Constitution, land use agencies have the primary authority to plan and control land use.[1] Each of California's incorporated cities and counties are required to adopt a comprehensive, long-term General Plan.[2]

The General Plan's long-term goals are implemented through zoning ordinances. These are local laws adopted by counties and cities that describe for specific areas the kinds of development that will be allowed within their boundaries.

Land use agencies are also the lead for doing environmental assessments under CEQA for new projects that may pose a significant environmental impact, or for new or revised General Plans.

Local Agency Formation Commissions (LAFCOs)

Operating in each of California's 58 counties, LAFCOs are composed of local elected officials and public members who are responsible for coordinating changes in local governmental boundaries, conducting special studies that review ways to reorganize, simplify, and streamline governmental structures, and preparing a sphere of influence for each city and special district within each county. Each Commission's efforts are directed toward seeing that local government services are provided efficiently and economically while agricultural and open-space lands are protected. LAFCO decisions strive to balance the competing needs in California for efficient services, affordable housing, economic opportunity, and conservation of natural resources.

[1] The legal basis for planning and land use regulation is the "police power" of the city or county to protect the public's health, safety and welfare. The California Constitution gives cities and counties the power to make and enforce all local police, sanitary and other ordinances and regulations not in conflict with general laws. State law reference: California Constitution, Article XI §7.

[2] OPR General Plan Guidelines, 2003: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

Councils of Government (COG)

COGs are organizations composed of local counties and cities that serve as a focus for the development of sound regional planning, including plans for transportation, growth management, hazardous waste management, and air quality. They can also function as the metropolitan planning organization for coordinating the region's transportation programs. COGs also prepare regional housing need allocations for updates of General Plan housing elements.

Local Air Districts

Under state law, air pollution control districts or air quality management districts (local air districts) are the local government agencies responsible for improving air quality and are generally the first point of contact for resolving local air pollution issues or complaints. There are 35 local air districts in California[3] that have authority and primary responsibility for regional clean air planning. Local air districts regulate stationary sources of air pollutants within their jurisdiction including but not limited to industrial and commercial facilities, power plants, construction activities, outdoor burning, and other non-mobile sources of air pollution. Some local air districts also regulate public and private motor vehicle fleet operators such as public bus systems, private shuttle and taxi services, and commercial truck depots.

- **Regional Clean Air Plans**

Local air districts are responsible for the development and adoption of clean air plans that protect the public from the harmful effects of air pollution. These plans incorporate strategies that are necessary to attain ambient air quality standards. Also included in these regional air plans are ARB and local district measures to reduce statewide emissions from mobile sources, consumer products, and industrial sources.

- **Facility-Specific Considerations**

Permitting. In addition to the planning function, local air districts adopt and enforce regulations, issue permits, and evaluate the potential environmental impacts of projects.

Pollution is regulated through permits and technology-based rules that limit emissions from operating units within a facility or set standards that vehicle fleet operators must meet. Permits to construct and permits to operate contain very specific requirements and conditions that tell each regulated source what it must do to limit its air pollution in compliance with local air district rules, regulations, and state law. Prior to receiving a permit, new facilities must go through a New Source Review (NSR) process that establishes air pollution control requirements for the facility. Permit conditions are typically contained in the permit to operate and specify requirements that businesses must follow; these may include limits on the amount of pollution that can be emitted, the

[3] Contact information for local air districts in California is listed in the front of this Handbook.

type of pollution control equipment that must be installed and maintained, and various record-keeping requirements.

Local air districts also notify the public about new permit applications for major new facilities, or major modifications to existing facilities that seek to locate within 1,000 feet of a school.

Local air districts can also regulate other types of sources to reduce emissions. These include regulations to reduce emissions from the following sources:

- hazardous materials in products used by industry such as paints, solvents, and de-greasers;
- agricultural and residential burning;
- leaking gasoline nozzles at service stations;
- public fleet vehicles such as sanitation trucks and school buses; and
- fugitive or uncontrolled dust at construction sites.

However, while emissions from industrial and commercial sources are typically subject to the permit authority of the local air district, sensitive sites such as a day care center, convalescent home, or playground are not ordinarily subject to an air permit. Local air district permits address the air pollutant emissions of a project but not its location.

Under the state's air toxics program, local air districts regulate air toxic emissions by adopting ARB air toxic control measures, or more stringent district-specific requirements, and by requiring individual facilities to perform a health risk assessment if emissions at the source exceed district-specific health risk thresholds[4], [5] (See the section on ARB programs for a more detailed summary of this program).

One approach by which local air districts regulate air toxics emissions is through the "Hot Spots" program.[6] The risk assessments submitted by the facilities under this

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[4] Cal/EPA's Office of Environmental Health Hazard Assessment has published "A Guide to Health Risk Assessment" for lay people involved in environmental health issues, including policymakers, businesspeople, members of community groups, and others with an interest in the potential health effects of toxic chemicals. To access this information, please refer to http://www.oehha.ca.gov/pdf/HRSguide2001.pdf

[5] Section 44306 of the California Health & Safety Code defines a health risk assessment as a detailed comprehensive analysis that a polluting facility uses to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations, and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure.

[6] AB-2588 (the Air Toxics "Hot Spots" Information and Assessment Act) requires local air districts to prioritize facilities by high, intermediate, and low priority categories to determine which must perform a health risk assessment. Each district is responsible for establishing the prioritization score threshold at which facilities are required to prepare a health risk assessment. In establishing priorities for each facility, local air districts must consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the district determines may indicate that the facility may pose a significant risk. All facilities within the highest category must prepare a health risk assessment. In addition, each district may require facilities in the intermediate and low priority categories to also submit a health risk assessment.

Table D-1
Local Sources of Air Pollution, Responsible Agencies, and Associated Regulatory Programs

Source	Examples	Primary Agency	Applicable Regulations
Large Stationary	Refineries, power plants, chemical facilities, certain manufacturing plants	Local air districts	Operating permit rules Air Toxics "Hot Spots" Law (AB 2588) Local district rules Air Toxic Control Measures (ATCMs)* New Source Review rules Title V permit rules
Small Stationary	Dry cleaners, auto body shops, welders, chrome plating facilities, service stations, certain manufacturing plants	Local air districts	Operating permit conditions, Air Toxics "Hot Spots" Law (AB 2588) Local district rules ATCMs* New Source Review rules
Mobile (non-fleet)	Cars, trucks, buses	ARB	Emission standards Cleaner-burning fuels (e.g., unleaded gasoline, low-sulfur diesel) Inspection and repair programs (e.g., Smog Check)
Mobile Equipment	Construction equipment	ARB, U.S. EPA	ARB rules U.S. EPA rules
Mobile (fleet)	Truck depots, school buses, taxi services	Local air districts, ARB	Local air district rules ARB urban bus fleet rule
Areawide	Paints and consumer products such as hair spray and spray paint	Local air district, ARB	ARB rules Local air district rules

*ARB adopts ATCMs, but local air districts have the responsibility to implement and enforce these measures or more stringent ones.

program are reviewed by OEHHA and approved by the local air district. Risk assessments are available by contacting the local air district.

Enforcement. Local air districts also take enforcement action to ensure compliance with air quality requirements. They enforce air toxic control measures, agricultural and residential burning programs, gasoline vapor control regulations, laws that prohibit air pollution nuisances, visible emission limits, and many other requirements designed to

clean the air. Local districts use a variety of enforcement tools to ensure compliance. These include notices of violation, monetary penalties, and abatement orders. Under some circumstances, a permit may be revoked.

- **Environmental Review**

As required by the California Environmental Quality Act (CEQA), local air districts also review and comment on proposed land use plans and development projects that can have a significant effect on the environment or public health.[7]

California Air Resources Board

The ARB is the air pollution control agency at the state level that is responsible for the preparation of air plans required by state and federal law. In this regard, it coordinates the activities of all local air districts to ensure all statutory requirements are met and to reduce air pollution emissions for sources under its jurisdiction.

Motor vehicles are the single largest emissions source category under ARB's jurisdiction as well as the largest overall emissions source statewide. ARB also regulates emissions from other mobile equipment and engines as well as emissions from consumer products such as hair sprays, perfumes, cleaners, and aerosol paints.

Air Toxics Program

Under state law, the ARB has a critical role to play in the identification, prioritization, and control of air toxic emissions. The ARB statewide comprehensive air toxics program was established in the early 1980's. The Toxic Air Contaminant Identification and Control Act of 1983 (AB 1807, Tanner 1983) created California's program to reduce exposure to air toxics.[8] The Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots program) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, the ARB is required to use certain criteria to prioritize the identification and control of air toxics. In selecting substances for review, the ARB must consider criteria relating to emissions, exposure, and health risk, as well as persistence in the atmosphere, and ambient concentrations in the community. AB 1807 also requires the ARB to use available information gathered from the Hot Spots program when prioritizing compounds.

The ARB identifies pollutants as toxic air contaminants and adopts statewide air toxic control measures (ATCMs). Once ARB adopts an ATCM, local air districts must

[7] Section 4 of this Handbook contains more information on the CEQA process.
[8] For a general background on California's air toxics program, the reader should refer to ARB's website at http://www.arb.ca.gov/toxics/tac/appendxb.htm.

implement the measure, or adopt and implement district-specific measures that are at least as stringent as the state standard. Taken in the aggregate, these ARB programs will continue to further reduce emissions, exposure, and health risk statewide.

With regard to the land use decision-making process, ARB, in conjunction with local air districts, plays an advisory role by providing technical information on land use-related air issues.

Other Agencies

Governor's Office of Planning and Research (OPR)

In addition to serving as the Governor's advisor on land use planning, research, and liaison with local government, OPR develops and implements the state's policy on land use planning and coordinates the state's environmental justice programs. OPR updated its General Plan Guidelines in 2003 to highlight the importance of sustainable development and environmental justice policies in the planning process. OPR also advises project proponents and government agencies on CEQA provisions and operates the State Clearinghouse for environmental and federal grant documents.

California Department of Housing and Community Development

The Department of Housing and Community Development (HCD) administers a variety of state laws, programs and policies to preserve and expand housing opportunities, including the development of affordable housing. All local jurisdictions must update their housing elements according to a staggered statutory schedule, and are subject to certification by HCD. In their housing elements, cities and counties are required to include a land inventory which identifies and zones sites for future residential development to accommodate a mix of housing types, and to remove barriers to the development of housing.

An objective of state housing element law is to increase the overall supply and affordability of housing. Other fundamental goals include conserving existing affordable housing, improving the condition of the existing housing stock, removing regulatory barriers to housing production, expanding equal housing opportunities, and addressing the special housing needs of the state's most vulnerable residents (frail elderly, disabled, large families with children, farmworkers, and the homeless).

Transportation Agencies

Transportation agencies can also influence mobile source-related emissions in the land use decision-making process. Local transportation agencies work with land use agencies to develop a transportation (circulation) element for the General Plan. These local government agencies then work with other transportation-related agencies, such as the Congestion Management Agency (CMA), Metropolitan Planning Organization

(MPO), Regional Transportation Planning Agency (RTPA), and Caltrans to develop long and short range transportation plans and projects.

Caltrans is the agency responsible for setting state transportation goals and for state transportation planning, design, construction, operations and maintenance activities. Caltrans is also responsible for delivering California's multibillion-dollar state Transportation Improvement Program, a list of transportation projects that are approved for funding by the California Transportation Commission in a 4-year cycle.

When safety hazards or traffic circulation problems are identified in the existing road system, or when land use changes are proposed such as a new residential subdivision, shopping mall or manufacturing center, Caltrans and/or the local transportation agency ensure the projects meet applicable state, regional, and local goals and objectives.

Caltrans also evaluates transportation-related projects for regional air quality impacts, from the perspective of travel-related emissions as well as road congestion and increases in road capacity (new lanes).

California Energy Commission (CEC)

The CEC is the state's CEQA lead agency for permitting large thermal power plants (50 megawatts or greater). The CEC works closely with local air districts and other federal, state and local agencies to ensure compliance with applicable laws, ordinances, regulations and standards in the permitting, construction, operation and closure of such plants. The CEC uses an open and public review process that provides communities with outreach and multiple opportunities to participate and be heard. In addition to its comprehensive environmental impact and engineering design assessment process, the CEC also conducts an environmental justice evaluation. This evaluation involves an initial demographic screening to determine if a qualifying minority or low-income population exists in the vicinity of the proposed project. If such a population is present, staff considers possible environmental justice impacts including from associated project emissions in its technical assessments.[9]

Department of Pesticides Regulation (DPR)

Pesticides are industrial chemicals produced specifically for their toxicity to a target pest. They must be released into the environment to do their job. Therefore, regulation of pesticides focuses on using toxicity and other information to ensure that when pesticides are used according to their label directions, potential for harm to people and the environment is minimized. DPR imposes strict controls on use, beginning before pesticide products can be sold in California, with an extensive scientific program to ensure they can be used safely. DPR and county enforcement staff tracks the use of pesticides to ensure that pesticides are used properly. DPR collects periodic

[9] See California Energy Commission, "Environmental Performance Report," July 2001 at http://www.energy.ca.gov/reports/2001-11-20_700-01-001.PDF

measurements of any remaining amounts of pesticides in water, air, and on fresh produce. If unsafe levels are found, DPR requires changes in how pesticides are used, to reduce the possibility of harm. If this cannot be done - that is, if a pesticide cannot be used safely - use of the pesticide will be banned in California.[10]

Federal Agencies

Federal agencies have permit authority over activities on federal lands and certain resources, which have been the subject of congressional legislation, such as air, water quality, wildlife, and navigable waters. The U.S. Environmental Protection Agency generally oversees implementation of the federal Clean Air Act, and has broad authority for regulating certain activities such as mobile sources, air toxics sources, the disposal of toxic wastes, and the use of pesticides. The responsibility for implementing some federal regulatory programs such as those for air and water quality and toxics is delegated by management to specific state and local agencies. Although federal agencies are not subject to CEQA they must follow their own environmental process established under the National Environmental Policy Act (NEPA).

[10] For more information, the reader is encouraged to visit the Department of Pesticide Regulation web site at www.cdpr.ca.gov/docs/empm/pubs/tacmenu.htm.

SPECIAL PROCESSES THAT APPLY TO SCHOOL SITING

The California Education Code and the California Public Resources Code place primary authority for siting public schools with the local school district, which is the 'lead agency' for purposes of CEQA. The California Education Code requires public school districts to notify the local planning agency about siting a new public school or expanding an existing school. The planning agency then reports back to the school district regarding a project's conformity with the adopted General Plan. However, school districts can overrule local zoning and land use designations for schools if they follow specified procedures. In addition, all school districts must evaluate new school sites using site selection standards established in Section 14010 of Title 5 of the California Code of Regulations. Districts seeking state funding for school site acquisition must also obtain site approval from the California Department of Education.

Before making a final decision on a school site acquisition, a school district must comply with CEQA and evaluate the proposed site acquisition/new school project for air emissions and health risks by preparing and certifying an environmental impact report or negative declaration. Both the California Education Code section 17213 and the California Public Resources Code section 21151.8 require school districts to consult with administering agencies and local air districts when preparing the environmental assessment. Such consultation is required to identify both permitted and non-permitted "facilities" that might significantly affect health at the new site. These facilities include, but are not limited to, freeways and other busy traffic corridors, large agricultural operations, and rail yards that are within one-quarter mile of the proposed school site, and that might emit hazardous air emissions, or handle hazardous or acutely hazardous materials, substances, or waste.

As part of the CEQA process and before approving a school site, the school district must make a finding that either it found none of the facilities or significant air pollution sources, or alternatively, if the school district finds that there are such facilities or sources, it must determine either that they pose no significant health risks, or that corrective actions by another governmental entity would be taken so that there would be no actual or potential endangerment to students or school workers.

In addition, if the proposed school site boundary is within 500 feet of the edge of the closest traffic lane of a freeway or traffic corridor that has specified minimum average daily traffic counts, the school district is required to determine through specified risk assessment and air dispersion modeling that neither short-term nor long term exposure poses significant heath risks to pupils.

State law changes effective January 1, 2004 (SB352, Escutia 2003, amending Education Code section 17213 and Public Resources Code section 21151.8) also provides for cases in which the school district cannot make either of those two findings and cannot find a suitable alternative site. When this occurs, the school district must adopt a statement of over-riding considerations, as part of an environmental impact

report, that the project should be approved based on the ultimate balancing of the merits.

Some school districts use a standardized assessment process to determine the environmental impacts of a proposed school site. In the assessment process, school districts can use maps and other available information to evaluate risk, including a local air district's database of permitted source emissions. School districts can also perform field surveys and record searches to identify and calculate emissions from non-permitted sources within one-quarter mile radius of a proposed site. Traffic count data and vehicular emissions data can also be obtained from Caltrans for major roadways and freeways in proximity to the proposed site to model potential emissions impacts to students and school employees. This information is available from the local COG, Caltrans, or local cities and counties for non-state maintained roads.

GENERAL PROCESSES USED BY LAND USE AGENCIES TO ADDRESS AIR POLLUTION IMPACTS

There are several separate but related processes for addressing the air pollution impacts of land use projects. One takes place as part of the planning and zoning function. This consists of preparing and implementing goals and policies contained in county or city General Plans, community or area plans, and specific plans governing land uses such as residential, educational, commercial, industrial, and recreational activities. It also includes recommending locations for thoroughfares, parks and other public improvements.

Land use agencies also have a permitting function that includes performing environmental reviews and mitigation when projects may pose a significant environmental impact. They conduct inspections for zoning permits issued, enforce the zoning regulations and issue violations as necessary, issue zoning certificates of compliance, and check compliance when approving certificates of occupancy.

Planning

- **General Plan**[1]

The General Plan is a local government "blueprint" of existing and future anticipated land uses for long-term future development. It is composed of the goals, policies, and general elements upon which land use decisions are based. Because the General Plan is the foundation for all local planning and development, it is an important tool for implementing policies and programs beneficial to air quality. Local governments may choose to adopt a separate air quality element into their General Plan or to integrate air quality-beneficial objectives, policies, and strategies in other elements of the Plan, such as the land use, circulation, conservation, and community design elements.

More information on General Plan elements is contained in Appendix D.

- **Community Plans**

Community or area plans are terms for plans that focus on a particular region or community within the overall general plan area. It refines the policies of the general plan as they apply to a smaller geographic area and is implemented by ordinances and other discretionary actions, such as zoning.

[1] In October 2003, OPR revised its General Plan Guidelines. An entire chapter is now devoted to a discussion of how sustainable development and environmental justice goals can be incorporated into the land use planning process. For further information, the reader is encouraged to obtain a copy of OPR's General Plan Guidelines, or refer to their website at: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

- **Specific Plan**

A specific plan is a hybrid that can combine policies with development regulations or zoning requirements. It is often used to address the development requirements for a single project such as urban infill or a planned community. As a result, its emphasis is on concrete standards and development criteria.

- **Zoning**

Zoning is the public regulation of the use of land. It involves the adoption of ordinances that divide a community into various districts or zones. For instance, zoning ordinances designate what projects and activities can be sited in particular locations. Each zone designates allowable uses of land within that zone, such as residential, commercial, or industrial. Zoning ordinances can address building development standards, e.g., minimum lot size, maximum building height, minimum building setback, parking, signage, density, and other allowable uses.

Land Use Permitting

In addition to the planning and zoning function, land use agencies issue building and business permits, and evaluate the potential environmental impacts of projects. To be approved, projects must be located in a designated zone and comply with applicable ordinances and zoning requirements.

Even if a project is sited properly in a designated zone, a land use agency may require a new source to mitigate potential localized environmental impacts to the surrounding community below what would be required by the local air district. In this case, the land use agency could condition the permit by limiting or prescribing allowable uses including operating hour restrictions, building standards and codes, property setbacks between the business property and the street or other structures, vehicle idling restrictions, or traffic diversion.

Land use agencies also evaluate the environmental impacts of proposed land use projects or activities. If a project or activity falls under CEQA, the land use agency requires an environmental review before issuing a permit to determine if there is the potential for a significant impact, and if so, to mitigate the impact or possibly deny the project.

- **Land Use Permitting Process**

In California, the authority to regulate land use is delegated to city and county governments. The local land use planning agency is the local government administrative body that typically provides information and coordinates the review of development project applications. Conditional Use Permits (CUP) typically fall within a land use agency's discretionary authority and therefore are subject to CEQA. CUPs are

intended to provide an opportunity to review the location, design, and manner of development of land uses prior to project approval. A traditional purpose of the CUP is to enable a municipality to control certain uses that could have detrimental environmental effects on the community.

The process for permitting new discretionary projects is quite elaborate, but can be broken down into five fundamental components:

- Project application
- Environmental assessment
- Consultation
- Public comment
- Public hearing and decision

Project Application

The permit process begins when the land use agency receives a project application, with a detailed project description, and support documentation. During this phase, the agency reviews the submitted application for completeness. When the agency deems the application to be complete, the permit process moves into the environmental review phase.

Environmental Assessment

If the project is discretionary and the application is accepted as complete, the project proposal or activity must undergo an environmental clearance process under CEQA and the CEQA Guidelines adopted by the California Resources Agency.[2] The purpose of the CEQA process is to inform decision-makers and the public of the potential significant environmental impacts of a project or activity, to identify measures to minimize or eliminate those impacts to the point they are no longer significant, and to discuss alternatives that will accomplish the project goals and objectives in a less environmentally harmful manner.

What is a "Lead Agency"?

A lead agency is the public agency that has the principal responsibility for carrying out or approving a project that is subject to CEQA. In general, the land use agency is the preferred public agency serving as lead agency because it has jurisdiction over general land uses. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

What is a "Responsible Agency"?

A responsible agency is a public agency with discretionary approval authority over a portion of a CEQA project (e.g., projects requiring a permit). As a responsible agency, the agency is available to the lead agency and project proponent for early consultation on a project to apprise them of applicable rules and regulations, potential adverse impacts, alternatives, and mitigation measures, and provide guidance as needed on applicable methodologies or other related issues.

What is a "Commenting Agency"?

A commenting agency is any public agency that comments on a CEQA document, but is neither a lead agency nor a responsible agency. For example, a local air district, as the agency with the responsibility for comprehensive air pollution control, could review and comment on an air quality analysis in a CEQA document for a proposed distribution center, even though the project was not subject to a permit or other pollution control requirements.

[2] Projects and activities that may have a significant adverse impact on the environment are evaluated under CEQA Guidelines set forth in title 14 of the California Code of Regulations, sections 15000 et seq.

To assist the lead agency in determining whether the project or activity may have a significant effect that would require the preparation of an EIR, the land use agency may consider criteria, or thresholds of significance, to assess the potential impacts of the project, including its air quality impacts. The land use agency must consider any credible evidence in addition to the thresholds, however, in determining whether the project or activity may have a significant effect that would trigger the preparation of an EIR.

The screening criteria to determine significance is based on a variety of factors, including local, state, and federal regulations, administrative practices of other public agencies, and commonly accepted professional standards. However, the final determination of significance for individual projects is the responsibility of the lead agency. In the case of land use projects, the lead agency would be the City Council or County Board of Supervisors.

A new land use plan or project can also trigger an environmental assessment under CEQA if, among other things, it will expose sensitive sites such as schools, day care centers, hospitals, retirement homes, convalescence facilities, and residences to substantial pollutant concentrations.[3]

CEQA only applies to "discretionary projects." Discretionary means the public agency must exercise judgment and deliberation when deciding to approve or disapprove a particular project or activity, and may append specific conditions to its approval. Examples of discretionary projects include the issuance of a CUP, re-zoning a property, or widening of a public road. Projects that are not subject to the exercise of agency discretion, and can therefore be approved administratively through the application of set standards are referred to as ministerial projects. CEQA does not apply to ministerial projects.[4] Examples of typical ministerial projects include the issuance of most building permits or a business license.

Once a potential environmental impact associated with a project is identified through an environmental assessment, mitigation must be considered. A land use agency should incorporate mitigation measures that are suggested by the local air district as part of the project review process.

Consultation

Application materials are provided to various departments and agencies that may have an interest in the project (e.g., air pollution, building, police, fire, water agency, Fish and Game, etc.) for consultation and input.

[3] Readers interested in learning more about CEQA should contact OPR or visit their website at http://www.opr.ca.gov/.

[4] See California Public Resources Code section 21080(b)(1).

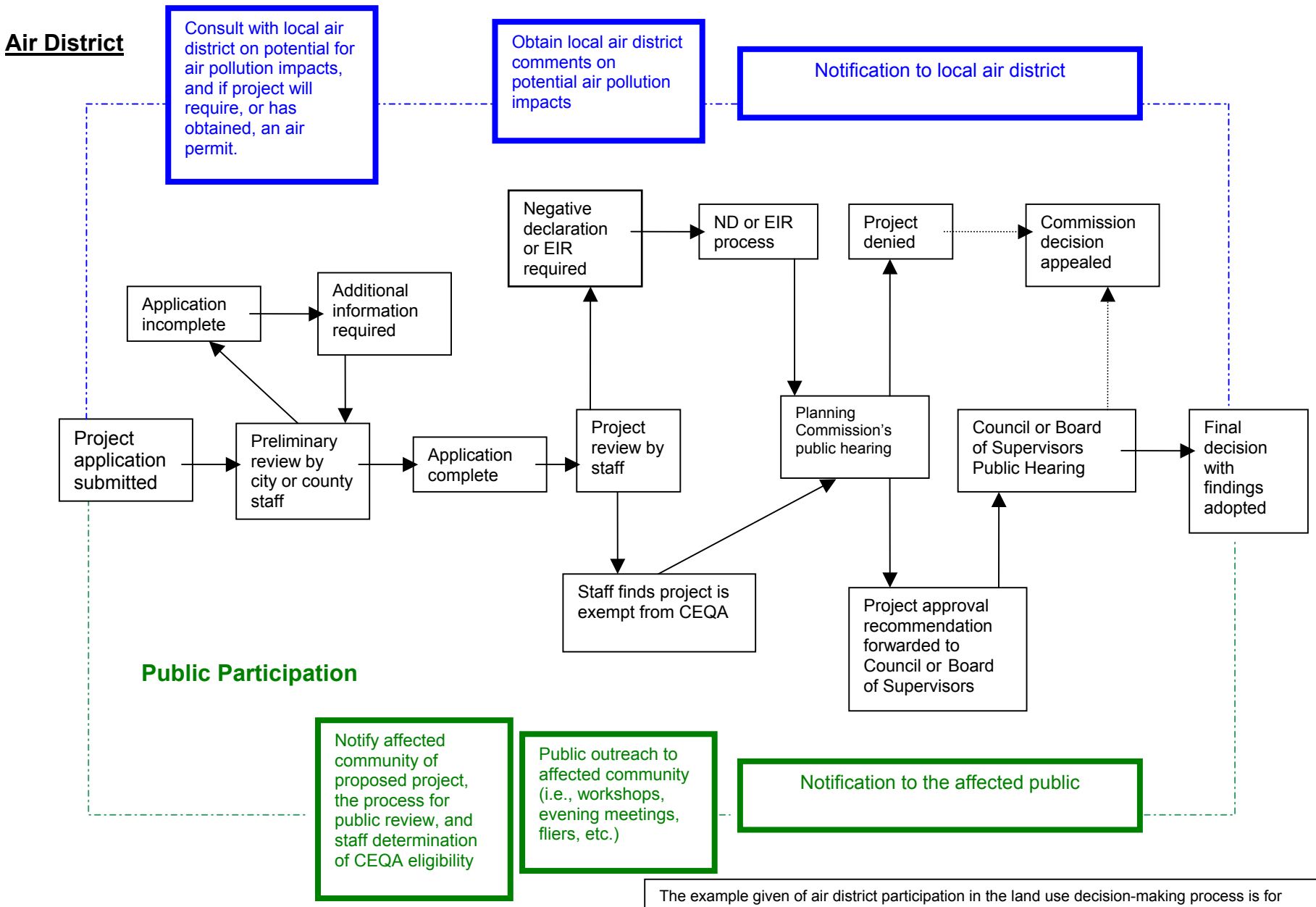
Public Comment

Following the environmental review process, the Planning Commission reviews application along with the staff's report on the project assessment and a public comment period is set and input is solicited.

Public Hearing and Decision

Permit rules vary depending on the particular permit authority in question, but the process generally involves comparing the proposed project with the land use agency standards or policies. The procedure usually leads to a public hearing, which is followed by a written decision by the agency or its designated officer. Typically, a project is approved, denied, or approved subject to specified conditions.

USE PERMIT (DISCRETIONARY ACTION) REVIEW PROCESS*



The example given of air district participation in the land use decision-making process is for illustrative purposes only. In reality, the land use siting process involves the ongoing participation of multiple affected agencies and stakeholders throughout the process.

GLOSSARY OF KEY AIR POLLUTION TERMS

Air Pollution Control Board or Air Quality Management Board: Serves as the governing board for local air districts. It consists of appointed or elected members from the public or private sector. It conducts public hearings to adopt local air pollution regulations.

Air Pollution Control Districts or Air Quality Management Districts (local air district): A county or regional agency with authority to regulate stationary and area sources of air pollution within a given county or region. Governed by a district air pollution control board.

Air Pollution Control Officer (APCO): Head of a local air pollution control or air quality management district.

Air Toxic Control Measures (ATCM): A control measure adopted by the ARB (Health and Safety Code section 39666 et seq.), which reduces emissions of toxic air contaminants.

Ambient Air Quality Standards: An air quality standard defines the maximum amount of a pollutant that can be present in the outdoor air during a specific time period without harming the public's health. Only U.S. EPA and the ARB may establish air quality standards. No other state has this authority. Air quality standards are a measure of clean air. More specifically, an air quality standard establishes the concentration at which a pollutant is known to cause adverse health effects to sensitive groups within the population, such as children and the elderly. Federal standards are referred to as National Ambient Air Quality Standards (NAAQS); state standards are referred to as California ambient air quality standards (CAAQS).

Area-wide Sources: Sources of air pollution that individually emit small amounts of pollution, but together add up to significant quantities of pollution. Examples include consumer products, fireplaces, road dust, and farming operations.

Attainment vs. Nonattainment Area: An attainment area is a geographic area that meets the National Ambient Air Quality Standards for the criteria pollutants and a non-attainment area is a geographic area that doesn't meet the NAAQS for criteria pollutants.

Attainment Plan: Attainment plans lay out measures and strategies to attain one or more air quality standards by a specified date.

California Clean Air Act (CCAA): A California law passed in 1988, which provides the basis for air quality planning and regulation independent of federal regulations. A major element of the Act is the requirement that local air districts in violation of the CAAQS

must prepare attainment plans which identify air quality problems, causes, trends, and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date.

California Environmental Quality Act (CEQA): A California law that sets forth a process for public agencies to make informed decisions on discretionary project approvals. The process helps decision-makers determine whether any potential, significant, adverse environmental impacts are associated with a proposed project and to identify alternatives and mitigation measures that will eliminate or reduce such adverse impacts.[1]

California Health and Safety Code: A compilation of California laws, including state air pollution laws, enacted by the Legislature to protect the health and safety of people in California. Government agencies adopt regulations to implement specific provisions of the California Health and Safety Code.

Clean Air Act (CAA): The federal Clean Air Act was adopted by the United States Congress and sets forth standards, procedures, and requirements to be implemented by the U.S. Environmental Protection Agency (U.S. EPA) to protect air quality in the United States.

Councils of Government (COGs): There are 25 COGs in California made up of city and county elected officials. COGs are regional agencies concerned primarily with transportation planning and housing; they do not directly regulate land use.

Criteria Air Pollutant: An air pollutant for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Examples include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10 and PM2.5. The term "criteria air pollutants" derives from the requirement that the U.S. EPA and ARB must describe the characteristics and potential health and welfare effects of these pollutants. The U.S. EPA and ARB periodically review new scientific data and may propose revisions to the standards as a result.

District Hearing Board: Hears local air district permit appeals and issues variances and abatement orders. The local air district board appoints the members of the hearing board.

Emission Inventory: An estimate of the amount of pollutants emitted into the atmosphere from mobile, stationary, area-wide, and natural source categories over a specific period of time such as a day or a year.

Environmental Impact Report (EIR): The public document used by a governmental agency to analyze the significant environmental effects of a proposed project, to identify

[1] To track the submittal of CEQA documents to the State Clearinghouse within the Office of Planning and Research, the reader can refer to CEQAnet at http://www.ceqanet.ca.gov.

alternatives, and to disclose possible ways to reduce or avoid the possible negative environmental impacts.

Environmental Justice: California law defines environmental justice as the fair treatment of people of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (California Government Code sec.65040.12(c)).

General Plans: A statement of policies developed by local governments, including text and diagrams setting forth objectives, principles, standards, and plan proposals for the future physical development of the city or county.

Hazardous Air Pollutants (HAPs): An air pollutant listed under section 112 (b) of the federal Clean Air Act as particularly hazardous to health. U.S. EPA identifies emission sources of hazardous air pollutants, and emission standards are set accordingly. In California, HAPs are referred to as toxic air contaminants.

Land Use Agency: Local government agency that performs functions associated with the review, approval, and enforcement of general plans and plan elements, zoning, and land use permitting. For purposes of this Handbook, a land use agency is typically a local planning department.

Mobile Source: Sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, and airplanes.

National Ambient Air Quality Standard (NAAQS): A limit on the level of an outdoor air pollutant established by the US EPA pursuant to the Clean Air Act. There are two types of NAAQS. Primary standards set limits to protect public health and secondary standards set limits to protect public welfare.

Negative Declaration (ND): When the lead agency (the agency responsible for preparing the EIR or ND) under CEQA, finds that there is no substantial evidence that a project may have a significant environmental effect, the agency will prepare a "negative declaration" instead of an EIR.

New Source Review (NSR): A federal Clean Air Act requirement that state implementation plans must include a permit review process, which applies to the construction and operation of new or modified stationary sources in nonattainment areas. Two major elements of NSR to reduce emissions are best available control technology requirements and emission offsets.

Office of Planning and Research (OPR): OPR is part of the Governor's office. OPR has a variety of functions related to local land-use planning and environmental programs. It provides General Plan Guidelines for city and county planners, and coordinates the state clearinghouse for Environmental Impact Reports.

Ordinance: A law adopted by a City Council or County Board of Supervisors. Ordinances usually amend, repeal or supplement the municipal code; provide zoning specifications; or appropriate money for specific purposes.

Overriding Considerations: A ruling made by the lead agency in the CEQA process when the lead agency finds the importance of the project to the community outweighs potential adverse environmental impacts.

Public Comment: An opportunity for the general public to comment on regulations and other proposals made by government agencies. You can submit written or oral comments at the public meeting or send your written comments to the agency.

Public Hearing: A public hearing is an opportunity to testify on a proposed action by a governing board at a public meeting. The public and the media are welcome to attend the hearing and listen to, or participate in, the proceedings.

Public Notice: A public notice identifies the person, business, or local government seeking approval of a specific course of action (such as a regulation). It describes the activity for which approval is being sought, and describes the location where the proposed activity or public meeting will take place.

Public Nuisance: A public nuisance, for the purposes of air pollution regulations, is defined as a discharge from any source whatsoever of such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. (Health and Safety Code section 41700).

Property Setback: In zoning parlance, a setback is the minimum amount of space required between a lot line and a building line.

Risk: For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g.,10 chances in a million).

Sensitive Individuals: Refers to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality).

Sensitive Sites or Sensitive Land Uses: Land uses where sensitive individuals are most likely to spend time, including schools and schoolyards, parks and playgrounds, day care centers, nursing homes, hospitals, and residential communities.

Setback: An area of land separating one parcel of land from another that acts to soften or mitigate the effects of one land use on the other.

State Implementation Plan (SIP): A plan prepared by state and local agencies and submitted to U.S. EPA describing how each area will attain and maintain national ambient air quality standards. SIPs include the technical information about emission inventories, air quality monitoring, control measures and strategies, and enforcement mechanisms. A SIP is composed of local air quality management plans and state air quality regulations.

Stationary Sources: Non-mobile sources such as power plants, refineries, and manufacturing facilities.

Toxic Air Contaminant (TAC): An air pollutant, identified in regulation by the ARB, which may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. TACs are considered under a different regulatory process (California Health and Safety Code section 39650 et seq.) than pollutants subject to State Ambient Air Quality Standards. Health effects associated with TACs may occur at extremely low levels. It is often difficult to identify safe levels of exposure, which produce no adverse health effects.

Urban Background: The term is used in this Handbook to represent the ubiquitous, elevated, regional air pollution levels observed in large urban areas in California.

Zoning ordinances: City councils and county boards of supervisors adopts zoning ordinances that set forth land use classifications, divides the county or city into land use zones as delineated on the official zoning, maps, and set enforceable standards for future develop

EXHIBIT E

Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review

Rajiv Bhatia

Thomas Rivard

May 6, 2008

Program on Health, Equity, & Sustainability
Occupational & Environmental Health Section
Department of Public Health
City and County of San Francisco

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I OVERVIEW – PREVENTING ROADWAY AIR QUALITY HAZARDS

Motor vehicles have been and will remain a major source of air pollution in the United States. While air pollutant emissions from motor vehicles are monitored and regulated on a regional basis, roadway air pollutant emissions vary significantly within a place or city meaning exposure is higher for those living near freeways and busy roadways.

Health research has consistently demonstrated that children living within 100-200 meters of freeways or busy roadways have poorer lung function and more asthma and respiratory symptoms than those living further away. Health effects, both chronic and acute, may result from exposure to both criteria air pollutants and mobile source air toxic. Health effects of air pollutant exposures may also involve synergistic effects among air pollutants, traffic noise and other traffic-related stressors.

In California, significant residential development is now occurring near freeways or busy arterial roadways. While infill development can reduce regional and global air pollution burdens, trends will increase exposure to air pollutants and their associated health burden for residents living in such developments.

In 2005, the California Air Resources Board issued guidance on preventing roadway related air quality conflicts, suggesting localities avoid placing new sensitive uses within 500 ft of many freeways. This guidance is advisory, and no existing federal and state regulations protect sensitive residential land uses from air pollution "hot spots" that occur near busy roadways. Federal and state agencies control air pollutants by regulating vehicle engine emissions on a "per mile" basis, generally ignoring impacts due to localized traffic intensity.

Good practice in planning and public health requires examining environmental hazards and potential health effects on a project-level basis and appropriate avoidance or mitigation. Furthermore, the California Environmental Quality Act (CEQA) requires the examination of potentially significant human health effects associated with environmental change. Preventative steps to avoid future land use air quality conflicts from busy roadways could include:

- Screening projects for exposure to high traffic volumes
- Examination of air quality exposure on a project-level basis
- Comprehensive health effects analysis involving identifying sensitive (receptors) populations, estimating exposure, and calculating health risks.
- Requirements to either avoid residential development or other sensitive uses at a site with relative high levels of vehicle air pollutants or building ventilation design improvements to filter outside air and locate air intakes away from pollution sources.
- Disclosure of exposure, health risks and included mitigations to future residents.

Guidance and regulations are needed to prevent health impacts associated with locating new residential uses near roadway air pollution hot spots. This document outlines a rationale and approach for the assessment and mitigation of air pollution health effects on sensitive uses from proximate roadway sources. Prevention of adverse air quality health effects requires a close coordination between public health, land use and transportation agencies. The table below outlines the key elements of a suggested program to evaluate and prevent roadway related effects at the project-level.

Programmatic Element	Description
Hazard Identification	Assess the cumulative vehicle volume on roadways within a 200 meter buffer of the sensitive site. The following sources may provide traffic data: • Caltrans Traffic Data (http://traffic-counts.dot.ca.gov/) • Local Public Works Departments • California Environmental Health Tracking Program's (CEHTP) spatial linkage web service to. (http://www.ehib.org/traffic_tool.jsp) • Environmental Impact Reports on projects in the area (Typically available from Departments of Planning) ***A potential hazard exists if average daily traffic volume exceeds the following thresholds*:*** 1. 100,000 vehicles / day within a 150 meter radius 2. 50,000 vehicles / day within a 100 meter radius 3. 10,000 vehicles /day within a 50 meter radius. **Note that the threshold of 100,000 vehicles with a 150 meter radius roughly corresponds to the CARB guidance avoiding sensitive uses. Thresholds for 100 meters and 50 meters are equivalent with regards to area traffic volume density.*
Exposure Assessment	Estimate concentration of PM 2.5 contributed by proximate roadway sources within a 150 meter radius of the project using physical based dispersion models using local data on vehicle volumes, vehicle types, emissions characteristics, meteorology. SFDPH recommends CAL3QHCR Line Source Dispersion Model with best available local meteorology. Other dispersion models may be appropriate as well.
Health Effects Assessment	If indicated quantify potential effects of roadway-related exposures to criteria and non-criteria pollutants on health outcomes using established risk assessment principles.
Action Threshold for Mitigation	Compare roadway contribution to annual average PM 2.5 concentration to an action threshold of 0.2 ug /m3 of PM 2.5.
Mitigation	***For sites with roadway contributions to PM 2.5 above the threshold concentration, prevent exposure or apply mitigations using the following hierarchy:*** 1. Relocate project outside hazardous zones around roadway of concern 2. Reroute or reduce traffic through circulation changes or traffic demand reduction. 3. Provide mechanical ventilation systems with best available supply intake air location; with fresh air filtration and building designs; and with reduced infiltration to mitigate particulate exposure.
Disclosure	For residents purchasing or renting property in proximity to hazardous roadway air pollution sources, provide information on exposure, hazards, and mitigations.

II BACKGROUND

The following sections provide the rationale for preventing air quality impacts from roadway sources though planning and the regulation of land uses. The section reviews vehicle pollutants, the epidemiology of roadway related health effects, intra-urban pollution variation, and sensitive populations.

Vehicle Related Air Pollutants

Engine exhaust, from diesel, gasoline, and other combustion engines, is a complex mixture of particles and gases, with collective and individual toxicological characteristics. Vehicle tailpipe emissions includes criteria air pollutants such as particulate matter and carbon monoxide, ozone precursor compounds such as nitrogen oxides (NO_x) and other hazardous air pollutants (e.g., air toxics) not regulated by EPA as criteria pollutants. Air pollutants associated with vehicle emissions are described in the table below.

Particulate matter (PM) represents a heterogeneous group of pollutants associated with vehicle emissions (WHO 2003). Collectively exposure fine particles are strongly associated with mortality, respiratory diseases and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease. Based on toxicological and epidemiological research, smaller particles and those associated with traffic appear more closely related to health effects (Schlesinger 2006). PM characteristics that may contribute to toxicity include: metal content; presence of polycyclic aromatic hydrocarbons and other toxic organic components. Other particulate matter characteristics that may be important to human health effects include: mass concentration; number concentration; acidity; particle surface chemistry; metals; carbon composition; and origin.

Motor vehicles aslo emit air toxics. EPA has identified six priority mobile source air toxics, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, naphthalene, and diesel exhaust. Similarly, the California Air Resources Board (CARB) has identified 10 air toxics of concern, five of which are emitted by on-road mobile sources: benzene, 1,3-butadiene, formaldehyde, acetaldehyde, and diesel PM (California Air Resources Board, 2001).

Mobile source air toxics are known or suspected to cause cancer or other serious health or environmental effects. Benzene is of particular concern because it is a known carcinogen and most of the nation's benzene emissions come from mobile sources. Diesel exhaust particulate matter (DPM) is a toxic air contaminant and known lung carcinogen resulting from combustion of diesel fuel in heavy duty trucks and heavy equipment.

Air Pollutants and Pollutant Mixtures with Important Motor Vehicle Sources

	Air Pollutant	Source	Health Effects
Criteria Pollutants	**Ozone**	Tropospheric ozone is formed in the atmosphere from chemical transformation of certain air pollutants in the presence of sunlight. Ozone precursors include vehicles, other combustion processes and the evaporation of solvents, paints, and fuels	Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.
	Carbon Monoxide (CO)	Produced due to the incomplete combustion of fuels, particularly by motor vehicles	Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood resulting in fatigue, impaired central nervous system function, and induced angina.
	Particulate Matter ***(PM_{10} and $PM_{2.5}$)***	Diverse sources including motor vehicles (tailpipe emissions as well as brake pad and tire wear, wood burning fireplaces and stoves, industrial facilities, and ground-disturbing activities	Impaired lung function, exacerbation of acute and chronic respiratory ailments, including bronchitis and asthma, excess emergency room visits and hospital admissions, pre-mature arteriosclerosis, and premature death.
	Nitrogen Dioxide (NO_2)	Combustion processes in vehicles and industrial operations	Increase the risk of acute and chronic respiratory disease and reduce visibility
	Sulfur Dioxide (SO_2)	Combustion of sulfur-containing fuels such as oil, coal, and diesel	Increased risk of acute and chronic respiratory
Non-criteria Pollutants	***Diesel exhaust***	Diesel engines	Probable human carcinogen (IARC Group 2A) Diesel engines also emit particulate matter criteria pollutants produced through combustion.
	Benzene	Gasoline engines	Known human carcinogen (IARC Group 1A)
	1,3 butadiene	Motor vehicle engines	Probable human carcinogen (IARC Group 2A)
	Benzo(a) pyrene	Motor vehicle engines	Probable human carcinogen (IARC Group 2A)

Epidemiology of Roadway Proximity Health Effects

Proximity to air pollution sources increases both exposure and hazards. With regards to roadway proximity effects, epidemiologic studies have consistently demonstrated that children living in proximity to freeways or busy roadways have poorer respiratory health outcomes (Delfino 2002). More recent research has found that health effects of roadway proximity may extend to coronary artery disease in adults. Several specific studies of roadway proximity health effects are briefly described below:

- A study of children in the Netherlands found that lung function declined with increasing truck traffic density especially for children living within 300 meters of motorways (Brunekreef 1997).
- Children in Erie County, New York hospitalized for asthma were more likely to live within 200 meters of heavily trafficked roads (Lin 2002).
- Among children living within 150 m of a main road in Nottingham, United Kingdom, the risk of wheeze increased with increasing proximity to the road (Venn 2001).
- In Oakland California, school children at schools in proximity to high volume roadways experienced more asthma and bronchitis symptoms (Kim 2004).
- In a low income population of children in San Diego, children with asthma living within 168 meters of high traffic flows were more likely than those residing near lower traffic flows to have more medical care visits for asthma (English 1999).
- In a study of Southern California School Children, living within 75 m of a major road was associated with an increased risk of lifetime asthma, prevalent asthma, and wheeze (McConnell 2006).
- In a study conducted in 12 southern California communities, children who lived with 500 meters of a freeway had reduced growth in lung capacity relate to those living greater than 1500 meters from the freeway (Guaderman 2004)
- In a study in Cincinnati, residence within 100 meters of stop and go bus and truck traffic predicted infant wheezing (Ryan 2005).
- In a study of German adults, residence within 200 meters of a major road predicted coronary artery calcification (Hoffman 2007). In the same population, residence within 150 meters of a major road predicted manifest coronary heart disease (Hoffmann 2007).

It is important to make clear distinction between specific roadway related health effects due to specific effects of particular air contaminants (e.g., diesel exhaust, benzene), health effects related to hot spots of criteria pollutants (e.g., fine particulate matter, carbon monoxide), and health effects due to the cumulative burden of roadway proximity. Unlike the epidemiological relationship between diesel exhaust and lung cancer hazard, at present, it is not possible to attribute the effects of roadway proximity on non-cancer health effects described above to one or more specific vehicle types or vehicle pollutants.

Intra-Urban Variation in Air Pollution Exposure due to Traffic

Within an area or place, exposure typically varies spatially with higher levels of exposure in proximity to sources of pollution. Roadways are important sources of intra-area variation for several air pollutants.

Several techniques have been employed to help estimate intra-urban variation in air pollutant concentrations dues to roadway sources; these techniques include pollutant monitoring, interpolation, land use regression, and dispersion analysis (Jerrett 2005).

Regional monitoring data conducted for NAAQS standards does not provide monitoring sufficient to adequately define for intra-urban exposure variation or hot spots due to traffic generated air pollutants. However, research in some locations based on measurements of shows that a significant share of spatial intra-urban air pollution variation in ambient levels of $PM_{2.5}$ is due to local traffic sources. For example, measurement of particulate matter along roads in different regions in the Netherlands has found that particle count is 40% higher 100 meters downwind of major traffic sources (Weijers 2004).

Land use regression techniques have been used to create a city-wide or region wide model of exposure based on land use and transportation characteristics (Ryan 2007). Researchers have created land use regression models for nitrogen dioxide validated in Alameda, San Diego, and Los Angeles have all found proximity to traffic to be key predictor of ambient nitrogen dioxide concentrations. A recent analysis in the New York City region found that traffic within 300-500 meters explained 37-44% of the variance of PM 2.5 (Ross 2007). Another analysis in the Los Angeles region found that traffic density within 300 meters along with industrial uses and government land predicted 69% of the variation in regional concentrations of $PM_{2.5}$ (Moore 2007).

Line source dispersion models are another available tool to predict variation of ambient concentrations of pollutants from traffic sources near roadways taking into account meteorological conditions, pollutant type, and other parameters (Jerrett 2005). One published study compared PM2.5 emissions predicted using the CALINE model against actual measures, finding an acceptable correspondence between measured and modeled levels for a suburban setting in Sacramento, California (Yura 2007).

A recent meta-analysis, based on 33 exposure studies, found significant spatial difference exist in multiple traffic related pollutants relative to proximity to busy roadways (Zhou 2007). The meta-analysis focused upon four pollutants; carbon dioxide, nitrogen oxides, particulates and ultrafine particulates. A variety of factors significantly influenced the spatial extent or the area of significant health impact associated with proximity to high traffic roadways. Such factors as background pollutant concentration, chemical reactivity (NO conversion NO2 and ultrafine coalescence to larger particulates), chemical inertness, meteorology, and health significance threshold all served to define the size of the spatial extent. The authors concluded that a 500 meter buffer around a high traffic roadway would be protective under most circumstances.

Roadway Air Pollutants in Infiltration into Indoor environments

Research shows consistent strong correlations between outdoor and indoor concentrations of traffic related air pollutants including constituents of particulate matter, such as benzene and PAHs, and volatile organic compounds, VOC's (Fishcer 2000). In one study, exposure in indoor environments to particulates, measured via light absorption, was 19-26% higher even when accounting for indoor sources such as appliances for cooking and heating (Wichmann 2005).

Sensitive Uses

The CARB Handbook puts the focus of its guidance on "land uses where sensitive individuals are most likely to spend time [including] schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities." It is important to note, however, that air quality does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects. Population subgroups sensitive to the health effects of air pollutants include the elderly and the young, population subgroups with higher rates of respiratory disease such as asthma and COPD, populations with other environmental or occupational health exposures that impact cardiovascular or respiratory diseases. Still, the focus on sensitive uses is appropriate because it not possible, within the context of planning, to distinguish sensitive uses with regards to population vulnerabilities

Environmental Justice Issues

Poverty confers a general susceptibility to the health effects of environmental stressors. For example, poorer residents may be more likely to live in crowded substandard housing and be more likely to live near industrial or roadway sources of air pollution. In California, the proportion of children of color living in high traffic density block is inversely related to median family income, and children of color are three times more likely to live in high-traffic areas than white children (Gunier 2003).

II APPLICABLE POLICIES, REGULATIONS, LAWS, AND GUIDANCE

Federal and State Regulation of Criteria Air Pollutants

The USEPA identifies 6 criteria air pollutants that have important human health impacts; these include Ozone (O_3), carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. The Clean Air Act requires the EPA to develop specific public health and welfare-based exposure standards for the six criteria air pollutants and directing States to develop plans to achieve theses standards. Nationally, a network of air quality monitors provides information on ambient concentrations of criteria air pollutants. California has state standards for the six criteria pollutants that are more stringent than the federal standards.

Despite promulgation of National Ambient Air Quality Standards for criteria pollutants and implementation of air quality control plans, air pollutants continue to have significant impacts on human health. In part, these ongoing effects are due to non-attainment of air quality standards; however, exposure to air pollutants also results in health impacts even when levels are below existing standards (Johnson and Graham 2005).

Particulate matter is an example of a criteria air pollutant with documented health effects below the NAAQS criteria standards and even$PM_{2.5}$ levels measured below State AAQS are not optimally protective of public health. In fact, there is no scientifically known no-effects threshold for $PM_{2.5}$ suggesting the health benefits from incremental improvements. According to a cost-benefit analysis recently done by the USEPA, reducing the NAAQS for $PM_{2.5}$ by 1 ug per cubic meter from 15 to 14 would result in 1900 fewer premature deaths, 3700 fewer non-fatal heart attacks, and 2000 fewer emergency room visits for asthma each year (USEPA 2006).

Similarly, the 2002 State of California Air Resources Board Air Quality Standards Staff Report for Particulate Matter estimated that significant health effects benefits would accrue from reducing ambient $PM_{2.5}$ from current levels to natural background concentrations for every county in California (CARB 2002). The results of that health benefits analysis conducted for the California Standards is detailed in the table below.

Health Benefits of Reducing Ambient $PM_{2.5}$ to Natural Background Levels for California

Health Outcome	Estimated Benefits of Exposure Reduction
Mortality from Long Term Exposures in people over	9391premature deaths /year
Mortality from Short Term Exposures in all ages	4014premature deaths /year
Chronic Bronchitis	11,414 cases /year
COPD Hospitalizations	1241 hospitalizations /year
Pneumonia Hospitalizations	1791 hospitalizations /year
Cardiovascular Hospitalizations	3180 hospitalizations /year
Asthma Hospitalizations	950 hospitalizations /year
Acute Bronchitis in ages 8-12	32,923 cases/year
Asthma Attacks	344,532 cases/year
Work Loss Days	2,923,535

Federal and State Regulation of Mobile Source Air Toxics

Toxic air contaminants (TACs), including benzene and diesel exhaust, are a category of air pollutants not regulated under Federal Criteria air pollution rules but known to have adverse human health effects, ranging from birth defects to cancer. Toxic air contaminants from mobile Sources are primarily regulated by the Federal government. For example, in February 2007, EPA finalized a rule to reduce hazardous air pollutants from mobile sources (Control of Hazardous Air Pollutants from Mobile Sources, February 9, 2007). The rule will limit the benzene content of gasoline and reduce toxic emissions from passenger vehicles and gas cans and will be fully implemented by 2030.

The Clean Air Act of 1967 also allowed California to regulate vehicles sold within the State and to require those vehicles to meet more stringent emission standards. The California Air Resources Board is responsible for establishing emission standards for vehicles sold in California and has a variety of new programs directed at improving air quality through vehicle emission reduction.

- Amendments to California low emission vehicle regulations will extend passenger car emission standards to sport utility vehicles and pickup trucks.
- New on board diagnostic system regulations requires monitoring of all vehicle functions that may affect vehicle emissions.
- New heavy duty trucks and busses are being required to significantly reduce emissions of diesel particulates and nitrogen dioxide.
- Idling restriction for these large diesel vehicles are also being implemented to reduce exposure to school children and residents.
- The Air Resources Board has created a variety of incentive and grant programs to either upgrade vehicle emissions or remove vehicles from the statewide inventory.

US EPA Rules on Hot Spot Analysis for Transportation Projects

The US Environmental Protection Agency (EPA) currently requires qualitative hot spot analysis for particulate matter (PM) for new transportation projects in Federal nonattainment or maintenance areas for PM10 or PM2.5 (USEPA 2006). Requirements for quantitative hot spot analysis e.g., using dispersion modeling to determine concentrations at receptor locations) are pending EPA speciification of procedures for analysis. This rule does not apply to locating new sensitive uses adjacent to existing roadway pollution sources.

California Air Resources Board Guidance on Land Use-Air Quality Conflicts

The California Air Resources Board does not regulate local land use planning but rather air pollutant emissions from vehicles. However, because of the robust evidence relating proximity to roadways and a range of non-cancer and cancer health effects, the California Air Resource Board created guidance for avoiding air quality conflicts in land use planning in their *Air Quality and Land Use Handbook: A Community Health Perspective* (2005). In the guidance, CARB recommends not locating sensitive land uses, including residential developments, within 500 feet of a highway with more than 100,000 vehicles per day. CARB recommendations relevant to transportation-related land use-air quality conflicts are listed in the table below.

California Air Resource Board Guidance on Land Use-Air Quality Conflicts

Pollutions Source	Recommendations
Freeways and High Volume Roadways	*Avoid siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.*
Distribution Centers	*Avoid siting sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TI unit operations exceed 300 hours per week).* *Take into account the configuration of existing distribution centers and avoid locating residences and other sensitive land uses near entry and exit points.*
Rail Yards	*Avoid siting sensitive land uses within 1,000 feet of a major service and maintenance rail yar* *Within one mile of a rail yard, consider possible siting limitations and mitigation approaches*
Ports	*Consider limitations on the siting of sensitive land uses immediately downwind of ports in the most heavily impacted zones.* *Consult with local air districts for the latest available data on health risks associated with po emissions.*

California Environmental Quality Act

The California Environmental Quality Act CEQA requires an environmental impact report (EIR) where discretionary public agency decision have potentially adverse impacts on the environment (California Public Resources Code. § 21000). The regulations for CEQA specifically require that the EIR discuss "health and safety problems caused by the physical changes" (California Code of Regulations. §15126.2). CEQA standards also require an EIS whenever environmental effects of a project have the potential to cause substantial adverse effects on human beings, either directly or indirectly (California Code of Regulations. §15065). In evaluating significant impacts, CEQA explicitly requires consideration of potential environmental effects resulting from bring people in proximity to environmental hazards. (CCR §15126.2)

The Bay Area Air Quality Management District (BAAQMD) last updated guidance for project level environmental review in December 1999 and current guidance does not address the air quality issues presented in the CARB Air Quality and Land Use Handbook with respect to sensitive receivers.

Most cities do not have do not have specific guidance for the analysis of project-level land use air quality conflicts. However, many jurisidictions including San Francisco do have significance thresholds relevant to potential air quality and heath conflicts from roadways sources. The typical wording of San Francisco's significance threshold relevant to roadway proximity health effects is as follows:

> ***Implementation of the proposed project would have a significant effect on air quality if it would:…***
> ***Expose Sensitive Receptors to Substantial Pollution Concentrations***

The recent environmental review of the Eastern Neighborhoods Community Plans in San Francisco concluded that rezoning in these areas would likely result significant environmental impacts to new residential uses because of the respiratory health effects of living near busy roadways SFDCP 2007. In this case, the Draft EIR also included innovative mitigations to require residential projects to analyze roadway pollution and mitigate effects on new residential uses through ventilation systems and building design.

General Plan Policies

Most cities in California have General Plans that include an Element developed to protect air quality. For example, the San Francisco's General Plan Air Quality Element establishes a goal of clean air planning to *reduce the level of pollutants in the air, to protect and improve public health, welfare and quality of life of the citizens of San Francisco and the residents of the metropolitan region*. The General Plan also recognized that the majority of air pollutants are generated on roadways from vehicle emissions. Policy 3.7 calls for calls for assessment of air quality hazards through modeling and prevention of new air quality hazards through building design

> **POLICY 3.7 Exercise air quality modeling in building design for sensitive land uses such as residential developments that are located near the sources of pollution such as freeways and industries.** *Project review and approval in the City should consider air quality implications. Certain land uses such as some types of industrial uses and freeways generally emit air pollutants that could be hazardous to human health, particularly that of sensitive receptors such as children, elderly and people with respiratory diseases. When reviewing new housing projects or other land uses to be used by sensitive receptors, location of industrial sites or other sources of air pollution should be considered in the design of the building to orient the air intake of the building away from the sources of pollution. Conversely, future industrial and other air polluting development should consider the existence of sensitive receptors in the vicinity.*

III ASSESSMENT OF AIR POLLUTION EXPOSURE AND HEALTH EFFECTS

In general, urban infill land use development can affect population health effects of air quality in two related ways.

- First, growth and development may result in new local area sources of air pollution through new transportation facilities, greater personal vehicle use, or increased demand for energy.
- Second, growth and development can bring a population in proximity to a pre-existing source of air pollution, like busy roadways, increasing exposure and hazard.

In general, pre-development assessment in areas potentially near hazardous air pollutions sources, such as busy roadways, should include at a minimum: (1) air quality modeling or direct measurement air pollutants under existing conditions; (2) modeling or estimation of future air quality conditions including changes associated with new or proposed uses; (3) identification of sensitive uses and exposed populations; and (4) where necessary, a health effects assessment as described above (BAAQMD 1999). Prevention of adverse air quality health effects requires a close coordination between land use and transportation systems planning. Specific mitigations include circulation changes or traffic demand reduction and filtration of ambient air.

The following assessment steps are designed to evaluate the increase in exposure associated with the specific change in traffic volume and type. Examples of air pollutant modeling and health risk assessment based on this approach are described in Appendix I.

Step 1: Hazard Identification

Prior to development approval, the developer should verify the intensity of area traffic in a 200 meter buffer using available sources of traffic data. The following sources may provide traffic data:

- Caltrans Traffic Data (http://traffic-counts.dot.ca.gov/)
- Local Public Works Departments
- California Environmental Health Tracking Program's (CEHTP) spatial linkage web service to. (http://www.ehib.org/traffic_tool.jsp) Within tool follow the following steps: (1) Select geocode address. (2) Enter address. (3) Select extract traffic metrics. (4) Enter radius in meters of buffer (150, 100, and 50 meters, as below. (5) Submit query. (6) Determine if sum of all unadjusted traffic volumes within buffer exceed potential hazard level.
- Environmental Impact Reports on projects in the area (Typically available from Departments of Planning)

A potential hazard exists if average daily traffic volume exceeds the following thresholds:

- 100,000 vehicles / day within a 150 meter radius
- 50,000 vehicles / day within a 100 meter radius
- 10,000 vehicles /day within a 50 meter radius.
- When heavy diesel bus and truck counts are available they shall be counted as equivalent to 22 vehicles when determining potential hazards (EMFAC, 2007).

The threshold of 100,000 vehicles with a 150 meter radius roughly corresponds to the CARB guidance avoiding sensitive uses. Thresholds for 100 meters and 50 meters are equivalent with regards to area traffic volume density.

Infill development is permissible in areas where the average daily traffic volumes are below these thresholds. Further analysis of hazards is generally not indicated if vehicle volumes fall below the above criteria.

Step 2: Exposure Estimation

Exposure modeling should occur for all sites a potential air quality hazard. As discussed above, assessment of air pollution using community wide monitoring data does not provide estimates of actual population exposure within a city and specifically within-area variation in air pollution hazards due to roadways. Exposure to roadway related air pollutants can be roughly estimated using distance or proximity to a pollution source as a proxy for exposure, however, this approach does not account for traffic characteristics, facility characteristics and meteorology. Exposure can be estimated using repeated measurements over representative traffic volume and meteorological conditions, but reliable exposure monitoring and evaluation requires multiple measurements over a period of multiple seasons.

For planning purposes, exposure can be more rapidly and efficiently estimated using Gaussian dispersion models based on physical characteristics of emissions, meteorology, link type (bridge, elevated, level, or canyon) and receptor horizontal and vertical location. A particular advantage of this technique is that line source regression models have also been used in health effects research relating roadways to adverse health outcomes and there is an established relationship between modeled exposures and health effects (Jerrett 2005).

The CAL3QHCR Line Source Dispersion Model Version 2.0, an enhanced version of CALINE3, is an example of a line source dispersion model that can be used to calculate exposure to an air pollutant at a development site due to roadway vehicle traffic (USEPA 2008). The USEPA recognizes CAL3CHCR as a preferred model for air quality modeling. The model further allows for the use of up to three years of hourly meteorological data in the calculation of receptor exposure. The Sacramento Metropolitan Air Quality District's (SMAQMD) in their recently upgraded CEQA guidance recommends CAL3QHCR should be used in assessment of roadway proximity health risks as the dispersion model to estimate PM_{10} concentrations at defined receptor locations by processing hourly meteorological data over a year, hourly emissions, and traffic volume (SMAQMD 2007).

This guidance suggest that prior to approval of a sensitive use in proximity to a busy roadway, development should model PM 2.5 concentrations attributable to existing and future area traffic for receptors at project site using the CAL3QHCR or anther equivalent methodology. Modeling should estimate both annual average and worst day (24-hour) exposure levels. Receptors may be located in a grid around a proposed development. Discrete receptors must be placed at a minimum at 6 receptors per acre and in the case of multiple storied buildings at ground, middle and rooftop locations which reflect potential worst case exposures. In addition receptors should be placed at the locations of all fresh air intakes. Discrete and grid receptors should encompass the perimeter of the project to include sensitive receiver locations closest to traffic. Suggested Data Sources for Model Parameters are listed below. A variety of graphic user interface programs exist for the CAL3QHCR model which simplify its use and implementation. One such modeling interface is the CAL-Roads View Interface Program produced by Lake Environmental (Lake Environmental 2006).

Model Parameter	Data Source and Typical Assumptions
Traffic data	Average hourly traffic volume (AADT/24hours).
Vehicle Emissions rates	California Air Resources Board EMFAC 2007. Emission in grams/mile is calculated by weighting known automobile, truck, and other type percentages.
Traffic speed	25mph local, 30 mph arterial, 55mph freeway
Temperature and Humidity	Area Annual Average (e.g., 50% relative humidity, and 50 degrees F)
Surface meteorology	Best available 3 year meteorology from BAAQMD
Number of Receptors	Minimum six receptors per acre. Grid receptor in Calroad. Receptors set at expected exposure heights.

Step 3: Threshold Evaluation for Action and Mitigation

In this protocol, PM 2.5 serves as a proxy for pollutant exposures from vehicles, and PM 2.5 is not the only pollutant of concern associated with vehicles or vehicle proximity. No federal, state, or local agency has adopted a health-based standard for evaluating roadway related pollution hot spots related to particulate matter. Based on available research, SFDPH therefore provides the following threshold to trigger action or mitigation.

0.2 ug /m3 of PM 2.5 annual average exposure from roadway vehicles within a 150 meter buffer of a sensitive receptor

The rationale for this threshold is enumerated below:

- A threshold of 0.2 ug / m3 represents about 8-10% of the intra-urban range of PM 2.5 ambient concentration based on available and reliable monitoring data in San Francisco.
- A change in ambient concentration of PM 2.5 by 0.2 ug /m3, independent of other vehicle pollutants would result in significant forecasted health impacts.
    - Based on a recent study of intra-urban pollution in Los Angeles, a 0.2 ug /m3 increase in PM 2.5 would result in a 0.28% increase in non-injury mortality or an increase of about twenty-one excess death per 1,000,000 population per year from non-injury causes in San Francisco (Jerrett 2005). This effect is well above the one-in-a-million lifetime *de minimus* risk threshold for premature death considered insignificant by most regulatory agencies (Asante-Duah 2002).
    - Applying the health effects assessment methodology and Concentration Response Functions in the CARB Staff Report on AAQS for PM published in 2002. A 0.2 ug /m3 increase in PM2.5 affecting a population of 100,000 adults would result in about 20 extra premature deaths per year (CARB 2002). This effect is well above the one-in-a-million lifetime *de minimus* risk threshold for premature death considered insignificant by most regulatory agencies (Asante-Duah 2002).

- A 0.2 ug /m3 increase in PM2.5 would also result in ~160 days per year with respiratory symptoms, 108 days with work limitations, and 577 days with minor activity limitations in the same adult population.

Step 4: Health Effects Analysis

If estimated exposure from near traffic sources is below the 0.2 ug/m3 Pm 2.5 action level for mitigation or if traffic exposures are fully mitigated, this guidance considers development permissible and completion of *Step 4: Health Effects Analysis* is not needed. Health effects analysis may still be desirable even where exposure levels are below the above action threshold to inform stakeholders or decision-makers. Health effects analysis may also be important to inform or motivate additional mitigations.

Forecasting heath effects associated with changes in exposure requires a concentration-response function, estimates of exposure, and baseline incidences of health effects. Concentration-response functions are equations that relate a change in the incidence of an adverse health outcome to the change in an ambient concentration of a pollutant and are typically based on regression analyses from epidemiological studies (WHO 2001). This approach has been used by the US Environmental Protection Agency and the State of California Air Resources Board for Particulate Matter in standard setting for particulate matter (CARB 2002).

Estimating Health Effects from Roadway PM 2.5 Concentrations

This guidance suggests predicting traffic-related PM 2.5 exposure effects on excess mortality from all non-injury causes based on a recent intra-urban air pollution and health study in Los Angeles. Simply stated, estimating excess mortality from a roadway source involves multiplying an estimate of PM2.5 exposure from existing and new traffic sources expressed in ug/m^3 (using CAL3QHCR as described above or an equivalent exposure model) times the crude incidence of mortality from non-injury causes times an effect measure for PM2.5 and mortality.

Excess Mortality $_{\text{Traffic Attributable PM 2.5}}$ **= (Concentration** $_{\text{Traffic Attributable PM 2.5}}$**) (Incidence** $_{\text{Non Injury Mortality}}$**) (Relative Risk** $_{\text{PM2.5}}$**)**

The relative risk (effect measure) in this formula, 0.014, is derived from the study by Jerrett et al. (2005) showed that every 1.0 ug /m3 increase in PM 2.5 results in a 1.4% increase in annual mortality incidence from all non-injury causes. The dose response relationship is consistent with other epidemiologic studies and can be extrapolated to other urban settings to provide a rapid estimate of health effects associated with intra-urban variation in PM 2.5 exposures. California Vital Statistics data or local county public health departments are sources of baseline crude mortality rates for specific categories of causes. The case study in the appendix provides an example of the application of this method.

Estimating Health Effects from Mobile Source Air Toxics

Estimating health effects, including cancer risks, from mobile source air toxics can be complimentary to the estimation of health effects from PM 2.5 described above. A common means of assessing cancer risk is to multiply an estimate of exposure to each carcinogenic substance by a Unit Risk Factor (URF) for that substance. This produces an estimate of excess risk of cancer over a lifetime of exposure. For example, to estimate excess cancer risk from diesel particulate matter exposure from a roadway source on a sensitive use, one would use PM 10 as a conservative estimate of diesel vehicle exhaust emissions. Using EMFAC 2007 to estimate PM 10 emissions and modeling those emissions in CAL3QHCR an annual diesel exposure can be approximated. Multiplying this exposure by the an inhalation cancer risk unit risk factor (URF) diesel exhaust ($3.0 \times 10^{-4.}$ ug/m^3)$^{-1}$ in order to produce an estimate additional lifetime cancer probability.

Excess Lifetime Cancer Risk $_{\text{Traffic Attributable DPM}}$ = (Traffic $_{\text{DPM}}$) (Unit Risk Factor $_{\text{DPM}}$)(1 million population)

Using this method, a roadway contribution of DPM of 1 ug/m^3 translates into risk of 300 excess cancers per one million people exposed over a lifetime ($300 = 1 \times 3.0 \times 10^{-4} \times 10^6$). Examples of the application of Unit Risk Factors are provided in the modeling examples in the Appendix on page 27.

A similar approach may be taken for other air toxics using an appropriate modeling tool for exposure from a roadway source. The table below enumerates unit risk factors for human cancer risk for several priority mobile sources assigned by the California Office of Environmental Health Hazard Assessment (OEHHA).

If health effects on cancer incidence are estimated, analytic protocols should follow the State of California guidance documented in OEHHA's Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessment (2003). If cancer risks are estimated, a risk of one in a million as stipulated in the Hot Spots Program (AB 2588) may be used as a thresholds for significant hazards and effects should be estimated for each USEPA priority Mobile Source Air Toxics

OEHHA Unit Risk Factors (expressed in $(mg/m^3)^{-1}$) for USEPA priority Mobile Source Air Toxics

Pollutant	**OEHHA URF**
Acetaldehyde	2.7×10^{-6}
Acrolein	N/A
Benzene	2.9×10^{-5}
1,3-Butadiene	1.7×10^{-4}
Formaldehyde	6.0×10^{-6}
DPM	3.0×10^{-4}

IV MITIGATION OF ROADWAY—SENSITIVE USE AIR QUALITY CONFLICTS

The California Air Resource Board, Air Quality and Land Use Handbook: A Community Health Perspective (2005) made recommendations to avoid locating sensitive land uses, including residential developments, within specific distances of certain known sources of toxic air contaminants (CARB 2005). Specific CARB recommendations for the location of residential uses relative to air pollution sources are listed in the table above. This guidance anticipates that some cases sensitive uses will be proposed or considered within the exclusion zone recommended by CARB and thus provides an approach to air quality assessment and mitigation within recommended zones of exclusion.

Mitigations to prevent impacts on air pollution exposures from roadway sources should follow comprehensive air quality assessment. This guidance recommends that the approach to mitigation should follow the following hierarchy:

1. **Changing Vehicle Circulation or Reducing Traffic**
2. **Locating Sensitive Uses To Minimize Exposure**
3. **Providing Ventilation Systems To Mitigate Roadway Exposures**

Tier 1: Changing Circulation or Reducing Traffic Volumes

Reducing the volume of traffic on streets programmed for residential or mixed-use residential use could significantly decrease the impacts of roadways on air pollution exposure. Circulation changes that would re-route through traffic around proposed new residential and mixed-use residential areas would reduce or displace the location of air pollution hot spots. Re-routing heavy duty truck and freight routes away from residential and mixed use residential areas could have a similar air quality benefit with regards to diesel emissions exposure. In considering circulation changes, it is important to prevent re-routing traffic or heavy duty truck and freight routes to other areas with existing or proposed sensitive uses.

Lowering traffic volumes via a comprehensive area wide traffic demand reduction program could also reduce exposure. The Metropolitan Transportation Agency, the Bay Area Air Quality District, and the South Coast Association of Governments are resources for the identification and evaluation of TDM measures. Vehicle emissions programs such as URBEMIS also allow a planner to estimate the effectiveness of a package of TDM measures on trip generation (URBEMIS 2008).

Tier 2: Locating Sensitive Uses To Minimize Exposure

Exposure analysis may suggest that pollutant concentrations vary across a project site. In this case, results from the exposure analysis can be used to situate sensitive uses within the lowest exposed areas available. If concentrations are below action levels or other levels of concern, further mitigation may not be indicated.

Tier 3: Providing mechanical ventilation systems with fresh air filtration.

When reducing traffic or locating residential uses in the areas of the project not impacted by roadway air pollutants is not feasible, residential uses should incorporate mechanical ventilation systems with ambient air filtration to mitigate exposure particulates and other pollutants of concern. The design of ventilation mitigations to protect sensitive uses from higher levels of pollution from mobile roadway sources should follow hazard and exposure assessment.

If the project anticipates operable windows or other sources of infiltration of ambient air, this guidance recommends that the development install a central HVAC (heating, ventilation and air conditioning) that includes high efficiency filters for particulates (MERV-13 or higher). If required, based on exposure measures, the system could also include a carbon filter to remove other chemical matter. The system should operate to maintain positive pressure within the building interior to prevent entrainment of outdoor air indoors.

Alternatively, if the development limits infiltration though non-operable windows and other techniques, it may reduce the need (and energy requirements) for maintaining building at positive pressure. Minimum design standards for a ventilation conditioned on low-infiltration would include the following: (1) ASHRAE MERV-13 supply air filters; (2) >= 1 air exchanges per hour of fresh outside filtered air ; (3) >= 4 air exchanges / hour recirculation; and (4) <= 0.25 air exchanges per hour in unfiltered infiltration. Systems with the above parameters should remove 80% of fine particulate matter mitigating all expected additional roadway effects of particulates and having added health benefits in terms of reducing allergen loads (Fisk 2001).

In either case, air intake systems for HVAC should be placed based on exposure modeling to minimize roadway air pollution sources. A licensed mechanical engineer should certify that the designed HVAC system offers the best available technology to minimize outdoor to indoor transmission of air pollution.

The developer should also ensure an ongoing maintenance plan for the HVAC and filtration systems. Residential project developers should disclose to buyers the findings of air quality evaluations. Developer should inform occupant's regarding the proper use of any installed air filtration.

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APPENDIX I-- EXPOSURE MODELING AND HEALTH RISK ASSESSMENT EXAMPLES FROM SAN FRANCISCO

Several examples below illustrate the use of CAL3QHCR by the San Francisco Health Department to model $PM_{2.5}$ concentration from high volume roadways at potential sensitive receptors for several locations in San Francisco. For some sites in the examples, the examples include estimates of human health hazards attributed to roadway pollutants. The reader should note that modeled pollutant concentrations do not take into account background concentrations or non-roadway sources and health risk assessments do not address all roadway pollutants. Model Parameters, sources, and assumptions for this case study are listed in the table below.

Model Parameter	**Data Sources and Assumptions**
Traffic data	California Department of Transportation Traffic Data (Peak hour traffic volume. Annual average traffic volume. Percentage of Truck Traffic)
Vehicle Emissions rates	California Air Resources Board EMFAC 2007
Traffic speed	25mph local, 30 mph arterial, 55mph freeway
Temperature and Humidity	Area Annual Average (e.g., 50% relative humidity, and 50 degrees F)
Surface meteorology	San Francisco International Airport (Available at the Meteorological Resource Center, http://www.webmet.com/State_pages/met_ca.htm)
Number of Receptors	Minimum six receptors per acre
PM 2.5 Concentration Response Function	Jerrett et al. 2005 (1.4% Increase in Rate of Non-Injury Mortality per unit ug /m^3 increase in PM 2.5)
Cancer Unit Risk Factors for	Office of Environmental Health Hazard Assessment 2002
Crude Non-Injury Mortality Rate	California DPH County Health Status Profiles 2006 (733 /100,000)

Example 1: Executive Park

Example 1 is an air quality analysis of Executive Park, a proposed mixed use residential community adjacent to and to the east of US 101 at the southern border of San Francisco. Figure 1 illustrates modeled annual average PM 2.5 concentrations and modeled DPM concentrations attributable to roadway emissions. The subsequent table provides findings including estimates of exposure from vehicle sources along with associated health effects. The modeled roadway attributable concentrations of PM 2.5 range from <0.10 to 0.5 at the project site. This concentration translates into a 0.7% excess annual risk of mortality for those exposed or 51 excess premature deaths per million people exposed at the location of highest exposure. The maximum modeled level of diesel particulate matter in the Executive Park Project was 0.2. The excess lifetime Cancer Risk attributable to traffic diesel particulate matter (DPM) would be 0.2 ug/m^3 times the unit risk factor for DPM of 3.0 x 10^{-4} times 10^6 population for an addition lifetime risk of 60 cancers in one million exposed people.

Figure 1 Spatial Extent of Roadway Emissions of PM 2.5 at the Executive Park Project Site from US 101 at Alana Street (Annual Average ugs/ m^3**).**

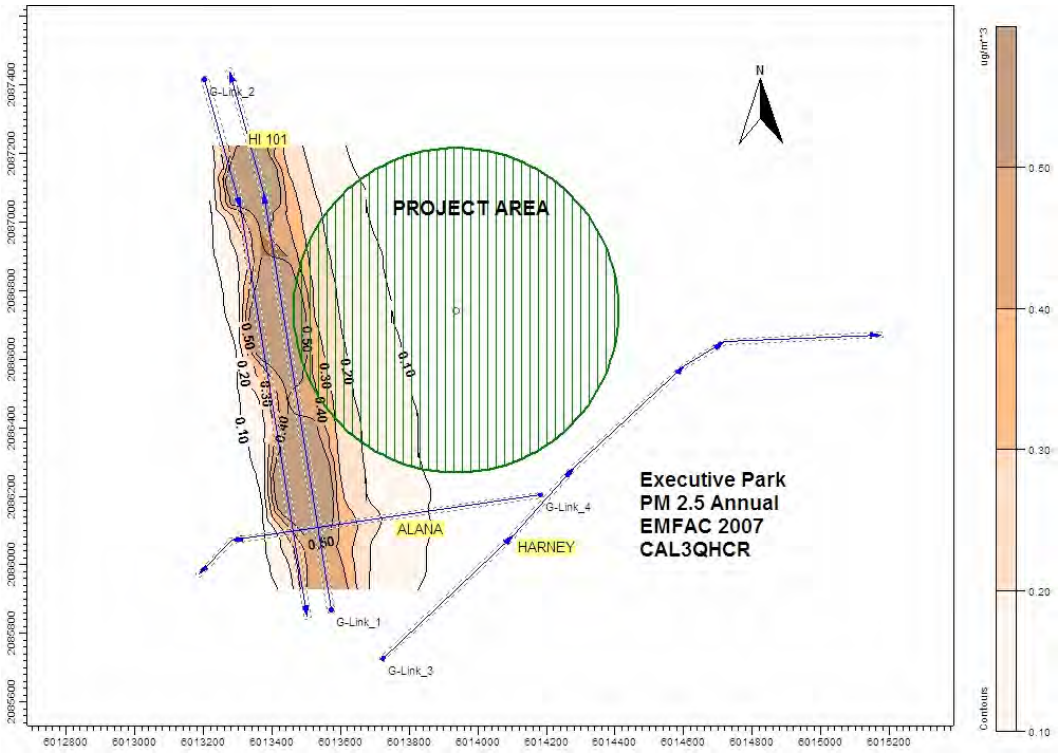
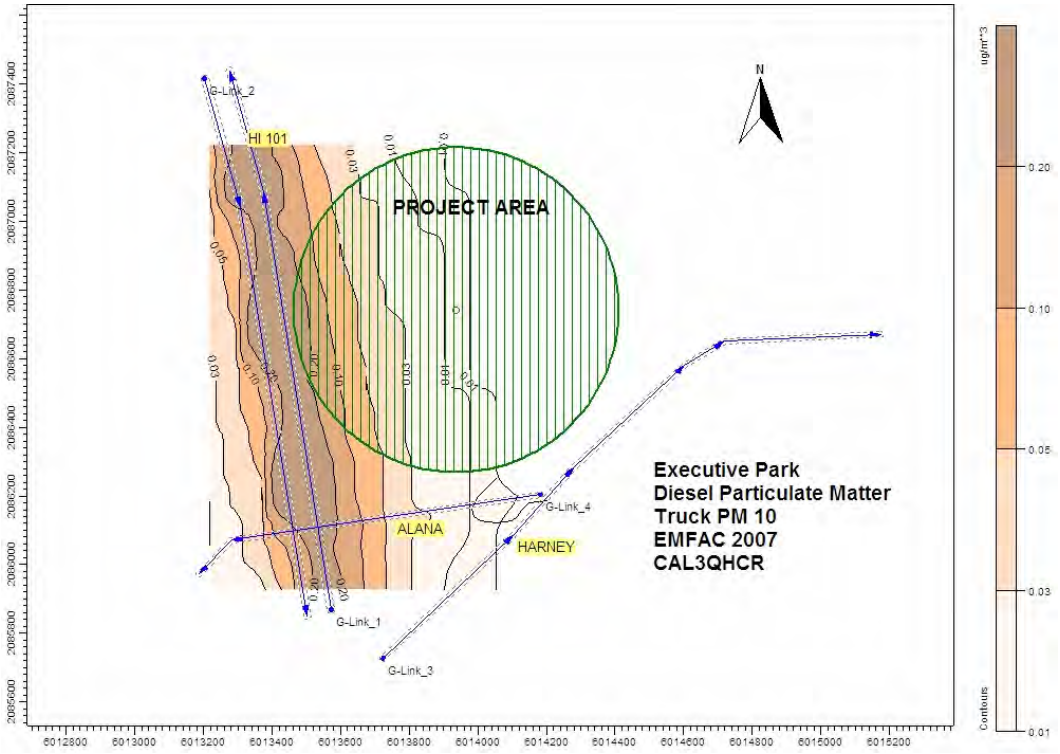


Figure 2. Spatial Extent of Diesel Particulate Matter (DPM) at the Executive Park Project Site from US 101 at Alana Street (Annual Average ugs/ m^3**).**



Modeled $PM_{2.5}$ and Diesel PM Concentrations from Roadway Sources and their Associated Mortality Hazards for the Project Site for the Executive Park Sub Area Plan in San Francisco

Roadway Location & AADT	Roadway PM 2.5 Concentration at Project Site (ugs/ m3)	Mortality Hazard Attributable to Roadway PM 2.5 based on highest site concentration	Roadway DPM Concentration at Project Site	Cancer Hazard Attributable to Roadway Diesel PM based on highest site concentration
US 101 @ Alana 216,000 vehicles/day	0.10 – 0.5 ugs/ m^3	10-51 excess deaths per million population per year	0.01 – 0.2 ugs/ m^3	60 excess cancers per million population

Example 2: 129 Girard Street Project, San Francisco

This example looks at a single family residential development on the upwind side of the Highway 101, Highway 280, Silver Avenue, and Bayshore Boulevard interchange. The impact of prevailing wind from the West disperses much of the particulate matter away from the development site and toward the downwind side of the freeway. Exposures above the action threshold can be seen to impact much of the Silver Terrace neighborhood including a significant portion of the Silver Terrace Playground shown below in green. The development site, however, is exposed below the action threshold. A similar analysis of the diesel particulate matter threshold is seen in Figure 4. Again the downwind dispersion of prevailing westerly wind results in low exposures at the development site.

Figure 3 Spatial Extent of Particulate Matter 2.5 at US 101 I-280 Interchange at Silver Avenue.

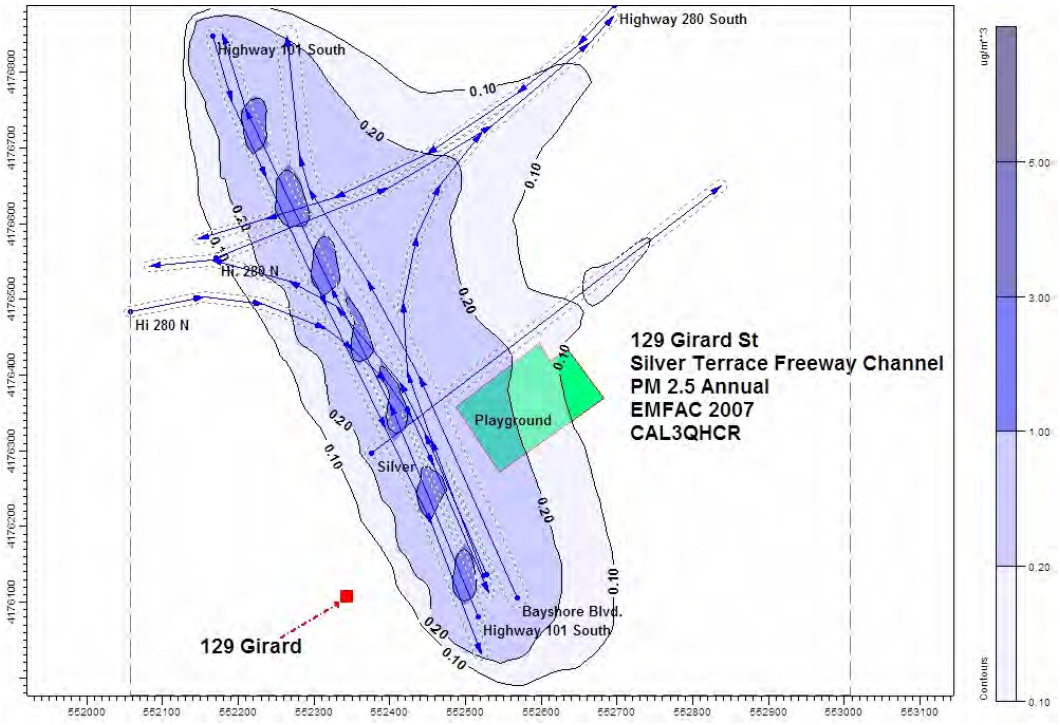
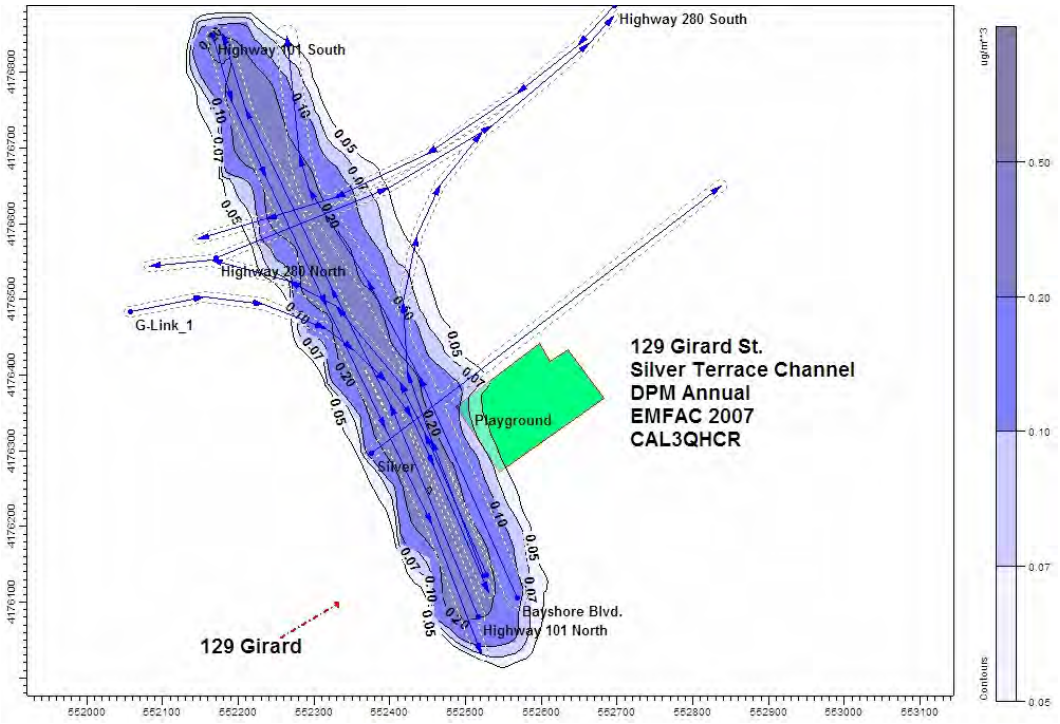


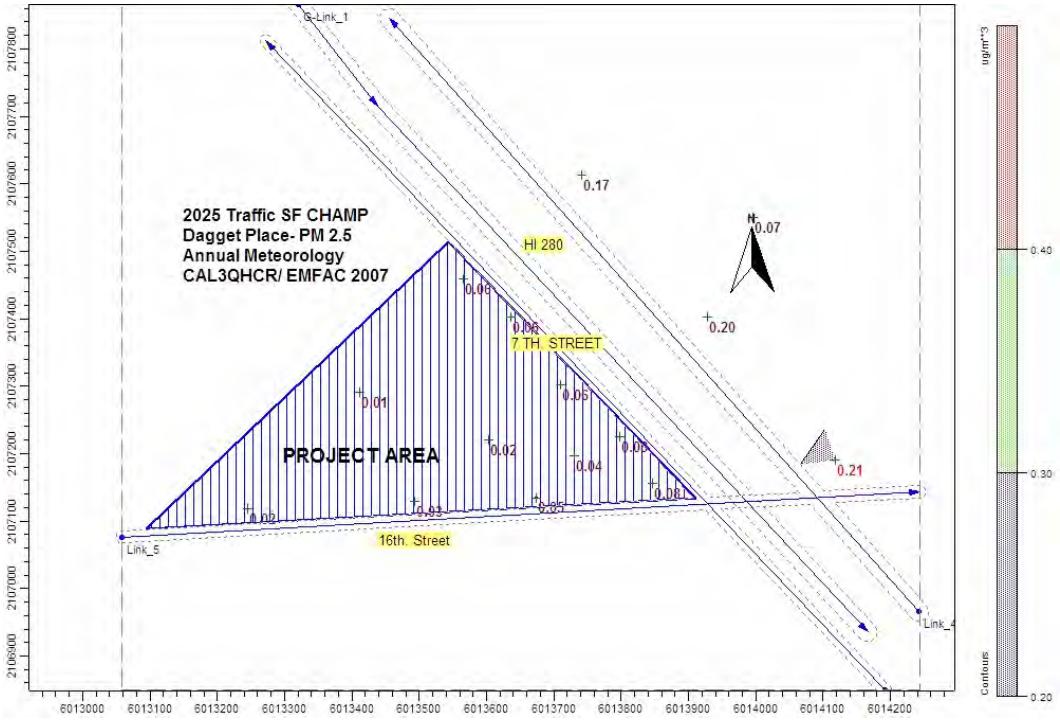
Figure 4 Spatial Extent of Diesel Particulate Matter at US 101 I-280 Interchange at Silver Avenue.



Example 3: Dagget Place Project, San Francisco

Example 3 demonstrates the use of the San Francisco County Transportation Authority traffic model, SF CHAMP, and the model's ability to predict future traffic volumes to the year 2025. In addition, EMFAC 2007, the California Air Resources Board's emission model produces traffic emissions for 2025 by including anticipated improvements in vehicle traffic emissions over time. In this development the effect of prevailing westerly wind, future emissions, and future traffic volumes results in exposure levels at the site beneath the action level of 0.2 ug/m^3. On the other hand, exposures at a similar development on the downwind side of Highway 280 would exceed the action level of 0.2 ugs/m^3.

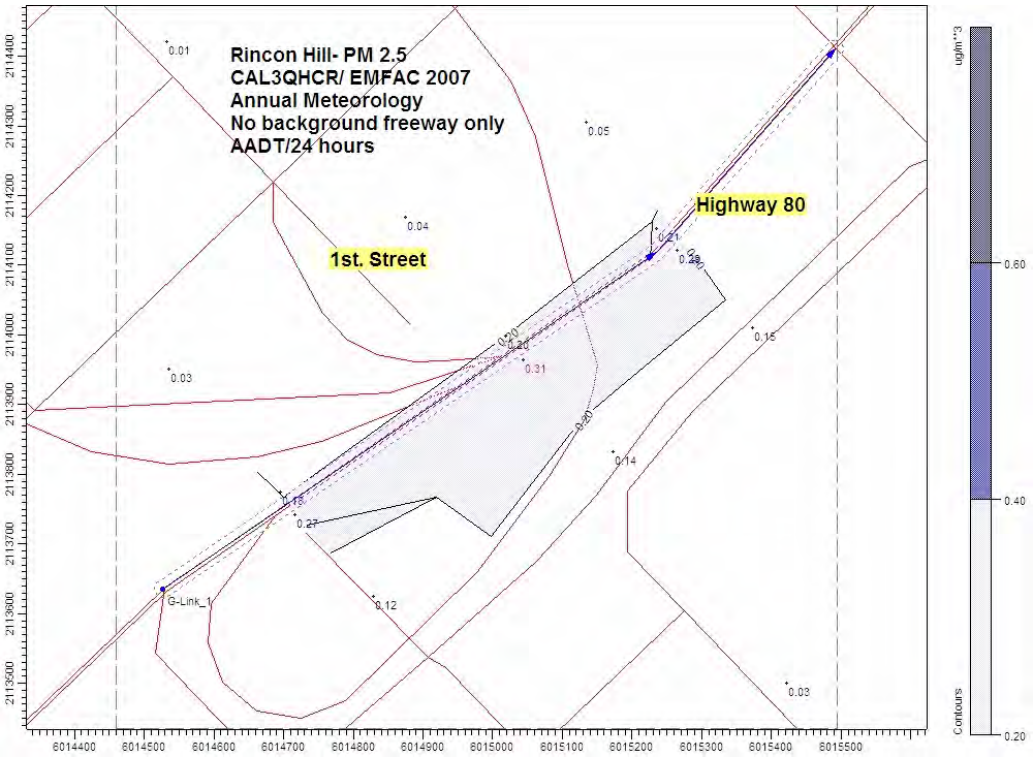
Figure 5 Spatial Extent of Particulate Matter 2.5 from Roadway Emissions at I-280 at 16th Street, San Francisco (Modeled as Annual Average).



Example 4: Rincon Hill, San Francisco

Example 4 represents the modeling of the Rincon Hill Tower on First St. near Highway 280. Again the effect of prevailing westerly wind can be seen with much of the particulate dispersion downwind of the development site. If this same development was located on the downwind side of the freeway it would have exceeded the action level and been subject to health risk assessment similar to Example 1, Executive Park, and would have required mitigations including strategic location of supply air inlets as well as possible filtration.

Figure 6 Spatial Extent of Particulate Matter 2.5 from Roadway Emissions at I-80 at 1st Street, San Francisco (Modeled as Annual Average).



APPENDIX II—AIR QUALITY MONITORING DATA FOR SAN FRANCISCO

In San Francisco, the Bay Air Quality Management District maintains one station for routine collection of monitoring data on criteria air pollutants on Arkansas Street. Criteria air pollutant monitoring data from that station is available at the URL: http://gate1.baaqmd.gov/aqmet/aq.aspx.

Some finer grained long term monitoring for Particulate Matter has recently been conducted in San Francisco for PM_{10} and $PM_{2.5}$ from several community stations contemporaneous with the BAAQMD measures. Sierra Research conducted the monitoring which started in early July 2005 and continued through late March 2006. Monitoring took place at two locations in Bayview/Hunters Point and two locations in Potrero at sites were chosen to be representative of community exposures. The study also monitored at the BAAQMD Arkansas Street monitoring station so that we could directly compare the BAAQMD measurements with those from our program.

Monitoring demonstrated that particulate matter measures (as an annual average) ranged from 16.9 to 20 ugs/m^3 fro PM_{10} and from 7.6 to 9.3 ug/m3 for $PM_{2.5}$. The results of the study are described in the tables below.

PM10 (ug/m3) Monitoring Results from San Francisco Electric Reliability Project

	Monitor Location	BAAQMD Arkansas St	Arkansas St	Southeast Community Center	Muni Maintenance Yard	Potrero Recreation Center	Malcolm X Academy	California Ambient AQ Std
PM 10	Average	19.0	18.6	18.3	20.0	16.9	17.5	20
	Maximum	46.8	45.3	41.5	45.0	36.7	35.2	50
PM 2.5	Average	9.1	8.9	9.3	8.9	7.6	7.9	12
	Maximum	27.7	22.8	22.2	22.7	16.1	18.4	None

EXHIBIT F

Exempt from Filing Fees pursuant to Government Code section 6103

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE
FEB 14 2013
G. Keyes

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE, a not-for-profit corporation,

Petitioner,

v.

COUNTY OF RIVERSIDE; CITY OF JURUPA VALLEY; and DOES 1 through 10, inclusive,

Respondents,

INVESTMENT BUILDING GROUP, a corporation; OBAYASHI CORPORATION, a corporation; DENNIS ROY ARCHITECT, INC., doing business as RGA OFFICE OF ARCHITECTURAL DESIGN, a corporation; O C REAL ESTATE MANAGEMENT, LLC, a limited liability corporation; SP4 DULLES LP, a limited partnership; and DOES 11 through 20, inclusive,

Real Parties in Interest,

PEOPLE OF THE STATE OF CALIFORNIA, ex rel. Kamala D. Harris, Attorney General,

Intervenor/Petitioner.

Case No. RIC1112063

[[redacted] CONSENT JUDGMENT

(Code Civ. Proc., § 664.6)

Judge: Honorable Sharon Waters
Dept: 1
Action Filed: July 19, 2011

This Consent Judgment and Stipulation for Entry of Final Judgment ("Consent Judgment") is hereby stipulated and agreed to by, between, and among the County of Riverside ("County"), the City of Jurupa Valley ("City"), Obayashi Corporation, SP4 Dulles LP, and Investment Building Group as the general partner for the property owner 54 DeForest Partnership L.P. (collectively, "the Real Parties," or "RPIs"), the Center for Community Action and Environmental Justice ("CCAEJ"), and the People of the State of California ex rel. Kamala D. Harris, Attorney General, ("People") (each of whom shall be referred to individually as a "Party" or collectively as the "Parties") to resolve all claims and actions raised in the above-captioned litigation, *Center for Community Action and Environmental Justice at el. v. County of Riverside et al.,* Riverside County Superior Court Case No. RIC1112063 (the "Litigation"), as follows:

I. RECITALS

A. On or about June 14, 2011, the County approved the Real Parties' proposed development of Plot Plan Nos. 16979, 17788, 18875, 18876, 18877, and 18879 on 65.05 gross (60.37 net) acres with a total building area of 1,134,268 square feet ("The Project"). The County's Project approvals included the adoption of Resolution Nos. 2011-170 and 2011-171, the certification of Environmental Impact Report ("EIR") No. 450, and the adoption of the Mitigation Monitoring and Reporting Plan.

B. On or about July 19, 2011, CCAEJ filed a Petition for Writ of Mandate and Petition for Injunctive Relief against the County, City, and Real Parties asserting alleged violations of California Environmental Quality Act ("CEQA") and Government Code section 11135 related to the County's approvals of the Project and certification of the EIR.

C. On or about October 5, 2011, the People filed a Complaint in Intervention and Petition for Writ of Mandate against the County, City, and Real Parties asserting alleged violations of CEQA related to the Project.

D. The Parties agree that this Consent Judgment is a full and complete resolution of all claims that have been asserted in the Litigation, and further that the Parties covenant not to sue on certain other claims set out in paragraphs 4, 8, 11, and 12 of this Consent Judgment.

E. The Parties agree that this Consent Judgment is entered into with the goal of achieving global settlement of any and all claims in the Litigation.

II. JURISDICTION

The Parties agree that the Superior Court of California, County of Riverside has subject matter jurisdiction over the matters alleged in this Litigation and personal jurisdiction over the Parties to this Consent Judgment.

III. TERMS

NOW THEREFORE, in consideration of the mutual covenants, agreements, representations, and warranties contained in this Consent Judgment, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties hereby stipulate and agree to entry of this Consent Judgment, and agree to the terms as set forth below.

A. Exhibit "A".

1. All Parties agree to comply with the terms set forth in Exhibit "A" and accompanying Attachments, attached hereto and incorporated herein by reference.

B. The City's Obligations.

2. The City's execution of this Consent Judgment shall constitute final approval of any and all additional Project mitigation measures or Project features described in Exhibit "A" and accompanying attachments of this Consent Judgment. The Project approvals previously issued on or about June 14, 2011, shall be fully and finally effective on the date the Consent Judgment is entered by the Court, subject to the conditions of approval and mitigation measures set forth in this Consent Judgment or previously required.

3. The City further agrees that, in calculating the expiration date for any and all Project approvals under the Project Condition of Approvals, the Subdivision Map Act, or other laws, the expiration date for those Project approvals shall not include the period of time during which this Litigation was pending. All applicable time periods associated with the Project approvals shall be stayed and extended for a time period commencing with the date the Petition in this Litigation was filed in the Superior Court for Riverside County and ending on the date the Consent Judgment is entered by the Court.

4. City's Covenant Not to Sue. The City covenants not to pursue any civil or administrative claims against the People or against any agency of the State of California arising out of or related to the Litigation.

C. Real Parties' Obligations.

5. Without admitting any liability, and in consideration of the terms of the Consent Judgment, as a compromise and settlement only, and as full and final settlement of all outstanding claims for attorneys' and consultants' fees and costs of suit related to the Litigation, Real Parties agree to make three payments, as described in the following paragraphs.

6. Real Parties agree to pay the sum of $103,000 to CCAEJ (the "Settlement Payment 1"). The Settlement Payment 1 will be in the form of a check made payable to "Johnson & Sedlack Client Trust Account" to be delivered to CCAEJ's counsel, Ray Johnson, within five (5) business days after the entry of this Consent Judgment. Except as set forth in this Paragraph, CCAEJ and their legal counsel specifically waive any right and/or claim to any additional attorneys' fees, costs, and/or consultant fees related to this Litigation and/or the Project.

7. Real Parties shall pay to the City the actual attorney fees and litigation expenses incurred by the City in this Litigation, not to exceed Fifty Thousand Dollars ($50,000). Upon the execution of this Consent Judgment by the Parties, the City shall notify the Real Parties of the total amount of its attorney fees and litigation expenses and the Real Parties shall pay said amount to the City within thirty (30) days of the date of entry of this Consent Judgment via check made out to City of Jurupa Valley.

8. Real Parties' Covenant Not to Sue. The Real Parties, and each of them, covenant not to pursue any civil or administrative claims against the People or against any agency of the State of California arising out of or related to the Litigation.

9. Timing of Payments Required by Exhibit "A". Within thirty (30) days of the entry of this Consent Judgment, Real Parties shall establish an escrow account with First American, the purpose of which shall be to hold in escrow the monetary sums set forth in Exhibit "A" that require Real Parties to make a monetary payment to the City. City shall maintain, including all administrative costs, the escrow account once established. These monetary sums shall be

deposited by the Real Parties in such a manner as to ensure release of those sums to the City as follows:

a. $30,000 shall be released to the City in satisfaction of the Real Parties' obligation under the "Anti-Idling Enforcement" term within thirty (30) days of the entry of this Consent Judgment.

b. $20,000 shall be released to the City in satisfaction of the Real Parties' obligation under the "Restricted Truck Route" term following the City's execution of a contract with a consultant retained to study and prepare environmental documentation of the restricted truck route and within ten (10) days of the city provision of written notice to the Real Parties of same.

c. $20,000 shall be released to the City in satisfaction of the Real Parties' obligation under the "EJ Element in General Plan" term within twelve (12) months of the entry of this Consent Judgment or within two (2) weeks of the City's issuance of its Notice of Preparation or Notice of Intent prepare a CEQA document for its General Plan or an amendment to its General Plan that includes an EJ Element, whichever is sooner.

D. CCAEJ's and People's Obligations.

10. Duty Not to Object or Disrupt Process for Project Approval. CCAEJ, and each of their individual members have represented to all other Parties that they support this Consent Judgment and the Project with the conditions imposed by this Consent Judgment. CCAEJ, on behalf of itself, its current and future members, agents, successors, assigns, designees, affiliates, and officers, will not directly or indirectly object, oppose, delay, frustrate, or disrupt the full and complete approval of the Project – including the issuance of any grading permit, building permits, certificates of occupancy, or any other permits necessary for the implementation of the Project – subject to the terms and conditions of this Consent Judgment, nor will they directly or indirectly encourage or fund others to undertake those actions. CCAEJ, on behalf of itself, its current and future members, agents, successors, assigns, designees, affiliates, and officers, further agree that

they will not submit or provide verbal or written comments to any decision-making body or public agency, or any other public agency that must issue a Project approval, that are critical of the Project or are intended to object to or oppose the full and complete approval of the Project, subject to the terms and conditions of this Consent Judgment. Further, CCAEJ, on behalf of itself, its current and future members, agents, successors, assigns, designees, affiliates, and officers, further agree that they will not directly or indirectly encourage or fund others to undertake the aforementioned actions.

11. CCAEJ's Covenant Not to Sue. CCAEJ, for itself and its current and future members, agents, successors, assigns, designees, affiliates, and officers, agree not to initiate, commence, or participate in any administrative appeal or lawsuit against the County, the City, the Real Parties, or any other public or private entity or the members, affiliates, partners, employees, or officers thereof relating to the Project's environmental review or approval – whether under CEQA, land use, or any other laws – except to enforce the terms of this Consent Judgment. CCAEJ, for itself and its current and future members, employees, agents, successors, assigns, designees, affiliates, and officers, shall not sue (i.e., initiate, commence, or participate in any administrative appeal or lawsuit) to invalidate the Project and the use or modification of the Project including, but not limited to, any approvals needed for the development of any phase of the Project, as long as the development or use is consistent with the terms of this Consent Judgment. CCAEJ, for itself and its current and future members, employees, agents, successors, assigns, designees, affiliates, and officers, further agree not to directly or indirectly encourage or fund others to undertake any of the actions described in this paragraph. The CCAEJ specifically retains, however, the right to assert a claim, demand or cause of action challenging any failure by the County, the City, or Real Parties to comply with this Consent Judgment.

12. People's Covenant Not to Sue. The People agree not to initiate, commence, or participate in any administrative appeal or lawsuit against the City, the Real Parties, or the members, affiliates, partners, employees, or officers thereof for: (a) the claims that were raised in the Litigation; and (b) other CEQA claims that could have been asserted by the People based upon the acts, omissions, and/or events that are alleged in the People's Complaint in Intervention

or that relate to the County's Project approvals issued on or about June 14, 2011. The People specifically retain, however, the right to assert a claim, demand or cause of action challenging any failure by the County, the City, or Real Parties to comply with this Consent Judgment. Except as expressly provided herein, nothing in this Consent Judgment is intended nor shall be construed to limit the People from taking appropriate enforcement actions or otherwise exercising their authority under any law. Further, nothing in this Consent Judgment is intended nor shall be construed to limit the People from taking any action related to any future proposed project, including any future project that may be related to this Project.

13. CCAEJ will not publish or cause to be published any press release or other written public disclosure ("Release") concerning this Consent Judgment or the settlement of the Litigation without first providing the proposed Release to the Real Parties for review and comment. Real Parties shall be provided 48-hours in which to review and provide any comments or requested edits to CCAEJ concerning the Release. CCAEJ agrees to consider any comments or requested edits in good faith prior to finalizing and/or issuing the Release.

E. General Terms.

14. Entry of Judgment. The Parties jointly request that the Court enter this Consent Judgment as a final judgment in the above-captioned action.

15. Retention of Jurisdiction. Pursuant to section 664.6 of the Code of Civil Procedure, the Parties request that the Court shall retain continuing jurisdiction over this matter and the Parties for the purpose of interpreting and enforcing the terms of this Consent Judgment.

16. Limits. This Consent Judgment shall not be construed as creating any right or benefit, substantive or procedural, enforceable at law or in equity, by any Party against the City, the County, or any of their governmental agencies, departments, political subdivisions or any other public entities other than those set forth herein.

17. Notices. Any notice, request, or communication required to be given to the Parties under this Consent Judgment shall be given in writing and shall be personally delivered or mailed by prepaid registered or certified mail to the addresses below:

County of Riverside	Pamela J. Walls Michelle Clack Office of Riverside County Counsel 3960 Orange Street, Suite 500 Riverside, CA 92501 (951) 955-6300/Telephone (951) 955-6363/Facsimile
City of Jurupa Valley	Peter M. Thorson Ginetta L. Giovinco Richards, Watson & Gershon PC 355 South Grand Avenue, 40th Floor Los Angeles, California 90071-3101 (213) 626-8484/Telephone (213) 626-0078/Facsimile
Obayashi Corporation, SP4 Dulles LP, and Investment Building Group (as the general partner for the property owner 54 DeForest Partnership L.P.)	Michelle Ouellette Best Best & Krieger LLP P. O. Box 1028 Riverside, CA 92502 (951) 686-1450 Telephone (951) 686-3083/Facsimile and SP4 Dulles LP c/o Brent Steele, Director CBRE Global Investors, LLC 515 S. Flower Street, Ste. 3100 Los Angeles, CA 90071
Center for Community Action and Environmental Justice	Raymond W. Johnson Abigail A. Broedling Kimberley Foy Johnson & Sedlack 26785 Camino Seco Temecula, CA 92590 (951) 506-9925/Telephone (951) 506-9725/Facsimile
	Sarah E. Morrison Deputy Attorney General Office of the California Attorney General

Office of the California Attorney General	300 S. Spring Street, Suite 1702 Los Angeles, CA 90013 (213) 897-2640/Telephone (213) 897-2802/Facsimile

18. Entire Agreement. The Parties acknowledge that this Consent Judgment is signed and executed without reliance upon any actual or implied promises, warranties or representations made by any of the Parties or by any representative of any of the Parties, other than those which are expressly contained within this Consent Judgment. This Consent Judgment, including the true and correct Recitals above, inclusive of all definitions contained therein, that are incorporated by reference herein as operative covenants and specifically relied upon by the Parties in executing this Consent Judgment, constitutes the entire agreement and understanding among and between the Parties and supersedes any and all other agreements whether oral or written between the Parties.

19. California Civil Code Section 1542. Upon the Effective Date of this Consent Judgment, as that term is defined below, each of the Parties has read and has otherwise been informed of the meaning of Section 1542 of the California Civil Code, and has consulted with its respective counsel, to the extent that any was desired, and understands the provisions of Section 1542. Each of the Parties, except for the People, hereby expressly waives the rights and benefits conferred upon it by the provisions of Section 1542 of the California Civil Code, which provides:

> "A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR."

_____ County's Initials	_____ City's Initials
_____ Real Parties' Initials	_____ CCAEJ Initials

Office of the California Attorney General	300 S. Spring Street, Suite 1702 Los Angeles, CA 90013 (213) 897-2640/Telephone (213) 897-2802/Facsimile

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County's Initials	City's Initials
Real Parties' Initials	CCAEJ Initials

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County's Initials	City's Initials
Real Parties' Initials	CCAEJ Initials

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_____	_____
County's Initials	City's Initials
JML 11/3/13	
Real Parties' Initials	CCAEJ Initials

Office of the California Attorney General	300 S. Spring Street, Suite 1702 Los Angeles, CA 90013 (213) 897-2640/Telephone (213) 897-2802/Facsimile

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_____	PMT/SGK
County's Initials	City's Initials
_____	_____
Real Parties' Initials	CCAEJ Initials

Office of the California Attorney General	300 S. Spring Street, Suite 1702 Los Angeles, CA 90013 (213) 897-2640/Telephone (213) 897-2802/Facsimile

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_____	_____
County's Initials	City's Initials
_____	_____
Real Parties' Initials	CCAEJ Initials

20. Amendments and Modifications. This Consent Judgment may only be amended or modified on a noticed motion by one of the Parties with subsequent approval by the Court, or upon written consent by all of the Parties and the subsequent approval of the Court.

21. Settlement, No Admissions by Parties. Each of the Parties acknowledges that this Consent Judgment relates to the avoidance of litigation and the preclusion of actions described above. The Parties, therefore, agree that this Consent Judgment is not to be treated or construed, at any time or in any manner whatsoever, as an admission by any Party that any of the allegations in the Litigation has merit.

22. Choice of Law and Choice of Forum. This Consent Judgment shall be deemed to have been executed and delivered within the State of California; the rights and obligations of the Parties hereunder shall be governed, construed and enforced in accordance with the laws of the State of California. The venue for any dispute arising from or related to this Consent Judgment, its performance, and its interpretation shall be the Superior Court of California, County of Riverside.

23. Joint Preparation. This Consent Judgment has been jointly drafted. No presumptions or rules of interpretation based upon the identity of the party preparing or drafting the Consent Judgment, or any part thereof, shall be applicable or invoked.

24. Damages. The Parties agree that the sole and exclusive remedy for breach of this Consent Judgment shall be an action for specific performance or injunction. In no event shall any Party be entitled to monetary damages for breach of this Consent Judgment.

25. Enforcement of Consent Judgment. No action for breach of this Consent Judgment shall be brought or maintained until: (a) the non-breaching Party provides written notice to the breaching Party which explains with particularity the nature of the claimed breach, and (b) within thirty (30) days after receipt of said notice, the breaching Party fails to cure the claimed breach or, in the case of a claimed breach which cannot be reasonably remedied within a thirty (30) day period, the breaching Party fails to commence to cure the claimed breach within such thirty (30) day period, and thereafter diligently complete the activities reasonably necessary to remedy the claimed breach.

26. City Attorneys' Fees. Separate and apart from the Parties' obligations as described herein, the Real Parties and their successors in interest separately agree to indemnify the City of Jurupa Valley and hold it harmless for any damages it may incur or attorney fees and litigation expenses it may incur arising from any action brought by the Petitioners, the People or persons other than the Real Parties to enforce the terms of this Consent Judgment or to otherwise challenge the Project. In the event such litigation is filed and served on the City, the City shall promptly notify the Real Parties and their successors in interest and Real Parties and their successors in interest shall deposit with the City an amount for attorneys fees as litigation expenses as estimated by the City Attorney for the City of Jurupa Valley, which deposit shall be replenished as necessary.

27. Authorized Signatory. Each Party represents and warrants to each other Party that its signature to this Consent Judgment has the authority to legally bind the Party, and this Consent Judgment does in fact bind the Party.

28. Parties Bound. This Consent Judgment shall apply to and be binding upon the Parties and each of them, and their officers, directors, agents, trustees, successors, and assigns.

29. People Not Liable. The People or any agency of the State of California shall not be liable for any injury or damage to persons or property resulting from acts or omissions by the County, City, or Real Parties, or their directors, officers, employees, agents, representatives or contractors, in carrying out activities pursuant to this Consent Judgment, nor shall the People or any agency of the State of California be held as a party to or guarantor of any contract entered into by the County, City or Real Parties in carrying out the requirements of this Consent Judgment.

30. Effective Date. This Consent Judgment is effective as of the date on which the Court enters this Consent Judgment on the Court's docket.

31. Counterparts. This Consent Judgment may be executed in counterparts and when so executed by the Parties, shall become binding upon them and each such counterpart will be an original document.

32. Costs and Attorneys' Fees. Except to the extent provided above, no party shall

claim costs or attorneys' fees from any other Party related to the Litigation. Further, each Party agrees that the terms of this Consent Judgment do not establish any Party as a "prevailing party" for purposes of claiming either costs or attorneys fees, and each Party specifically waives any other right that Party may have to seek costs or attorneys fees related to the Litigation.

IT IS SO STIPULATED AND AGREED.

RESPONDENT COUNTY OF RIVERSIDE

Dated: 1/31/13

ATTEST:
KECIA HARPER-IHEM, Clerk
By _____ DEPUTY

_____
for County of Riverside

by _____

RESPONDENT CITY OF JURUPA VALLEY

Dated: _____

_____
Laura Roughton, Mayor, for City of Jurupa Valley

REAL PARTIES IN INTEREST

Dated: _____

_____
for Obayashi Corporation

by _____

Dated: _____

_____
for Investment Building Group, as the general partner for 54 DeForest Partnership L.P.

by _____

Dated: _____

_____
for SP4 Dulles LP

by _____

claim costs or attorneys' fees from any other Party related to the Litigation. Further, each Party agrees that the terms of this Consent Judgment do not establish any Party as a "prevailing party" for purposes of claiming either costs or attorneys fees, and each Party specifically waives any other right that Party may have to seek costs or attorneys fees related to the Litigation.

IT IS SO STIPULATED AND AGREED.

RESPONDENT COUNTY OF RIVERSIDE

Dated: _____

_____
for County of Riverside

by_____

RESPONDENT CITY OF JURUPA VALLEY

Dated: _____

_____
Verne Lauritzen, Mayor, for City of Jurupa Valley

REAL PARTIES IN INTEREST

Dated: _____

_____
for Obayashi Corporation

by_____

Dated: _____

_____
for Investment Building Group, as the general partner for 54 DeForest Partnership L.P.

by_____

Dated: _____

_____
for SP4 Dulles LP

by_____

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IT IS SO STIPULATED AND AGREED.

RESPONDENT COUNTY OF RIVERSIDE

Dated: _____

_____
for County of Riverside

by_____

RESPONDENT CITY OF JURUPA VALLEY

Dated: _____

_____
Laura Roughton, Mayor, for City of Jurupa Valley

REAL PARTIES IN INTEREST

Dated: Jan. 16, 2013

_____
for Obayashi Corporation

by Yoshiharu Nakamura, Executive Officer

Dated: _____

_____
for Investment Building Group, as the general partner for 54 DeForest Partnership L.P.

by_____

Dated: _____

_____
for SP4 Dulles LP

by_____

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IT IS SO STIPULATED AND AGREED.

RESPONDENT COUNTY OF RIVERSIDE

Dated: _____

_____
for County of Riverside

by_____

RESPONDENT CITY OF JURUPA VALLEY

Dated: _____

_____
Laura Roughton, Mayor, for City of Jurupa Valley

REAL PARTIES IN INTEREST

Dated: _____

_____
for Obayashi Corporation

by_____

Dated: 1/3/13

_____
for Investment Building Group, as the general partner for 54 DeForest Partnership L.P.

by JACK M. LANGSON, PRESIDENT

Dated: _____

_____
for SP4 Dulles LP

by_____

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IT IS SO STIPULATED AND AGREED.

RESPONDENT COUNTY OF RIVERSIDE

Dated: _____

_____
for County of Riverside

by_____

RESPONDENT CITY OF JURUPA VALLEY

Dated: _____

_____
Laura Roughton, Mayor, for City of Jurupa Valley

REAL PARTIES IN INTEREST

Dated: _____

_____
for Obayashi Corporation

by_____

Dated: _____

_____
for Investment Building Group, as the general partner for 54 DeForest Partnership L.P.

by_____

Dated: 1/9/13

_____
for SP4 Dulles LP

by_____
Philip G. Hemeb
Vice President

John M. Gilb
Vice President

PETITIONER CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

Dated: Jan. 10, 2013

Penny J. Newman
for Center for Community Action and Environmental Justice
by Penny J. Newman, Ex. Dir.

INTERVENOR PEOPLE OF STATE OF CALIFORNIA

KAMALA D. HARRIS
Attorney General of California

Dated: _____

SARAH E. MORRISON
Deputy Attorney General

Attorneys for Intervenor People of the State of California, ex rel. Kamala D. Harris, Attorney General

Approved as to form by:

Dated: _____

Pamela J. Walls, County Counsel
for the County of Riverside

Dated: _____

Peter M. Thorson, City Attorney
for the City of Jurupa Valley

Dated: _____

Michelle Ouellette, for Obayashi Corporation, SP4 Dulles LP, and Investment Building Group (as the general partner for the property owner 54 DeForest Partnership L.P.)

Dated: Jan 10, 2013

Raymond W. Johnson, for Center for Community Action and Environmental Justice

PETITIONER CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

Dated: _____

_____
for Center for Community Action and Environmental Justice
by_____

INTERVENOR PEOPLE OF STATE OF CALIFORNIA

KAMALA D. HARRIS
Attorney General of California

Dated: 1/2/13

_____
SARAH E. MORRISON
Deputy Attorney General

Attorneys for Intervenor People of the State of California, ex rel. Kamala D. Harris, Attorney General

Approved as to form by:

Dated: _____

_____
Pamela J. Walls, County Counsel
for the County of Riverside

Dated: _____

_____
Peter M. Thorson, City Attorney
for the City of Jurupa Valley

Dated: _____

_____
Michelle Ouellette, for Obayashi Corporation, SP4 Dulles LP, and Investment Building Group (as the general partner for the property owner 54 DeForest Partnership L.P.)

Dated: _____

_____
Raymond W. Johnson, for Center for Community Action and Environmental Justice

PETITIONER CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

Dated: _____

_____
for Center for Community Action and Environmental Justice
by_____

INTERVENOR PEOPLE OF STATE OF CALIFORNIA

KAMALA D. HARRIS
Attorney General of California

Dated:_____

_____
SARAH E. MORRISON
Deputy Attorney General

Attorneys for Intervenor People of the State of California, ex rel. Kamala D. Harris, Attorney General

Approved as to form by:

Dated: 1/30/13

_____ for
Pamela J. Walls, County Counsel
for the County of Riverside
Michelle Clack Deputy County Counsel

Dated: _____

_____
Peter M. Thorson, City Attorney
for the City of Jurupa Valley

Dated: _____

_____
Michelle Ouellette, for Obayashi Corporation, SP4 Dulles LP, and Investment Building Group (as the general partner for the property owner 54 DeForest Partnership L.P.)

Dated: _____

_____
Raymond W. Johnson, for Center for Community Action and Environmental Justice

PETITIONER CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

Dated: _____

_____
for Center for Community Action and Environmental Justice
by _____

INTERVENOR PEOPLE OF STATE OF CALIFORNIA

KAMALA D. HARRIS
Attorney General of California

Dated: _____

_____
SARAH E. MORRISON
Deputy Attorney General

Attorneys for Intervenor People of the State of California, ex rel. Kamala D. Harris, Attorney General

Approved as to form by:

Dated: _____

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Pamela J. Walls, County Counsel
for the County of Riverside

Dated: January 17, 2013

_____
Peter M. Thorson, City Attorney
for the City of Jurupa Valley

Dated: _____

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Michelle Ouellette, for Obayashi Corporation, SP4 Dulles LP, and Investment Building Group (as the general partner for the property owner 54 DeForest Partnership L.P.)

Dated: _____

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Raymond W. Johnson, for Center for Community Action and Environmental Justice

PETITIONER CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

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INTERVENOR PEOPLE OF STATE OF CALIFORNIA

KAMALA D. HARRIS
Attorney General of California

Dated:_____

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SARAH E. MORRISON
Deputy Attorney General

Attorneys for Intervenor People of the State of California, ex rel. Kamala D. Harris, Attorney General

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Dated: _____

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Raymond W. Johnson, for Center for Community Action and Environmental Justice

IT IS SO ORDERED, ADJUDGED AND DECREED.

Dated: FEB 14 2013

Daniel A. Ottolia

Honorable Judge [redacted]
Judge of the Superior Court

EXHIBIT A

1. EJ Element in General Plan: Within the timeframes for adopting or updating general plans as required by law, as part of the proceedings of the City of Jurupa Valley (City) to adopt or update its General Plan, City agrees to use its best efforts to prepare an environmental justice element that includes specific policies, analyze any impacts of that element in any CEQA document prepared for the General Plan, and hold hearings or conduct other proceedings to consider the adoption of that environmental justice element. The environmental justice element prepared by the City shall be consistent with the California Office of Planning & Research ("OPR") General Plan Guidelines concerning environmental justice as they now exist or may hereafter be amended, and the Office of the Attorney General's guidance entitled, Environmental Justice at the Local and Regional Level – Legal Background (dated July 10, 2012), a copy of which is attached to the Consent Judgment as Exhibit B. The Real Parties in Interest (RPIs) shall contribute a total of $20,000 toward the preparation and consideration of the general plan element by the City.

The Parties understand and agree that, in the context of the City's processing its General Plan, including any Environmental Justice element, the City cannot guarantee the ultimate outcome of any public hearings before the City's Planning Commission or City Council, nor prevent any opposition thereto by members of the public affected by or interested in the General Plan. The Parties recognize that the adoption or amendment of the General Plan is a discretionary act and that nothing in this Consent Judgment limits, in any manner, the City's exercise of its police power under the California Constitution. Nothing in this Consent Judgment limits the City's discretion to determine what policies and provisions should be included in the environmental justice element. Subject to the foregoing, the City, to the extent allowed by law, shall facilitate and promote the proceedings necessary to complete processing of its General Plan and consideration of an Environmental Justice Element in the General Plan.

2. CEQA Analysis for Particular Future Projects to Address Impacts to Overburdened and Sensitive Communities: To further environmental justice, as defined to include the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, the City agrees to use its best efforts to analyze, as part of CEQA review, whether projects may impact certain overburdened communities and sensitive populations, including low income communities and communities of color. This analysis shall incorporate outreach to, and encourage the participation of, overburdened communities and sensitive populations, and shall be consistent with specific standards, including CEQA and the CEQA Guidelines, (Cal. Code Regs., tit. 14, § 15000 *et seq.*), and the Office of the Attorney General's guidance entitled, Environmental Justice at the Local and Regional Level – Legal Background (dated July 10, 2012), a copy of which is attached to the Consent Judgment as Exhibit B. The requirement to analyze impacts to overburdened and sensitive communities as part of CEQA review shall be included as a policy/action in any EJ element that the City may adopt for its General Plan.

3. **Restricted Truck Route:** Within fifteen (15) months of the entry of the Consent Judgment, the City agrees to use its best efforts to conduct proceedings for the adoption of an ordinance restricting trucks with gross vehicle weight rating ("GVWR") over 16,000 lbs. from accessing the portion of Etiwanda Avenue adjacent to Mira Loma Village (between the 60 Freeway and Hopkins Street). The restricted truck route ordinance proceedings shall comply with the California Environmental Quality Act (CEQA), and may include a study to determine if there are potential alternate routes for trucks with GVWR over 16,000 lbs on roadways other than Etiwanda Avenue described above. In the event that the City does not adopt a restricted truck route ordinance within two years of the entry of the Consent Judgment, then the RPIs agree that a new condition of approval will apply to the Project. That new condition shall require that the developers/owners of the Project request of all initial tenants, in writing, that any trucks accessing the Project site with GVWR over 16,000 lbs. owned or operated by tenants of the Project buildings avoid traveling on the portion of Etiwanda Avenue adjacent to Mira Loma Village (between the 60 Freeway and Hopkins Street).

The Parties understand and agree that, in the context of the City's processing an ordinance designating a restricted truck route, the City cannot guarantee the ultimate outcome of any public hearings before the City's Planning Commissions or City Council, nor prevent any opposition thereto by members of the public affected by or interested in the proposed truck route. The Parties recognize that the adoption of a restricted truck route ordinance is a discretionary act and that nothing in this Consent Judgment limits, in any manner, the City's exercise of its police power under the California Constitution. Subject to the foregoing, the City, to the extent allowed by law, shall facilitate and promote the proceedings necessary to complete processing of an restricted truck route.

As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit and the City agrees to honor RPIs' request. RPIs agree to contribute a total of $20,000 to the City for the cost of the study and environmental review associated with the restricted truck route payable to the City within the time period set forth in the Consent Judgment. The City shall not be obligated to expend any funding beyond this sum for the study. If additional funding for the study associated with the restricted truck route proceedings is needed, the City may apply to the Center for Community Action and Environmental Justice (CCAEJ) for additional funding from the Mira Loma Mitigation Trust Account ("Trust Account") described in Paragraph 12 of this Exhibit.

4. **Air Filtration Systems:** RPIs agree to fund the purchase, installation and maintenance of in-home air filtration systems for each residential parcel within Mira Loma Village, at a total cost of $1,700 per parcel, plus an additional $43,000 sum to cover administration costs. RPIs' provision of funding shall constitute its sole obligation with regard to this term. The air filtration systems shall be selected by the owners of each parcel, although recommendations as to the filtration systems selected may be provided to the parcel owners by the CCAEJ in consultation with South Coast Air Quality Management District ("SCAQMD"). A map of the Mira Loma Village and the 103 eligible residential parcels is attached hereto as Attachment 2. The air filtration funds provided by the RPIs will be deposited into the Trust Account described in Paragraph 12 of this Exhibit. In the event that CCAEJ, in consultation with SCAQMD,

determines that the air filtration systems will not be effective or necessary, the funds designated for air filtration systems in the Trust Account will be available to fund other mitigation to reduce the Project's air quality impacts, as determined by CCAEJ in consultation with the Attorney General's Office and SCAQMD. If the air filtration systems are determined by CCAEJ to be effective, then the designated funds in the Trust Account shall be distributed to Mira Loma Village residents upon presentation to the trust administrator of evidence showing that the resident is a parcel owner and receipts documenting air filtration system purchase, installation, and/or maintenance costs and/or expenditures on other air quality mitigation expenditures. Similarly, designated funds in the Trust Account may also be distributed directly to air filtration contractors or installers upon presentation to the trust administrator of an invoice or other evidence documenting that the contractor or installer has – on behalf of a parcel owner – purchased, installed, or maintained an air filtration system or made other air quality mitigation expenditures. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

5. **Anti-Idling Enforcement:** Within seven (7) months from the entry of the Consent Judgment, the City agrees to use its best efforts to implement a program to enforce the Air Resources Board's ("ARB") anti-idling regulation (Cal. Code Regs., tit. 13, § 2485) either through its enforcement of the ARB Regulations or through its adoption of a City truck anti-idling ordinance.

The City further agrees to the hiring/assigning of a code enforcement officer, whose duties shall include the enforcement of ARB's anti-idling regulation on a City-wide basis, including the vicinity of the Project. The extent of enforcement activity and the hiring or assigning of a code enforcement officer for the truck anti-idling enforcement program shall be subject to the City Council's discretion in establishing budget priorities for the City and the consequent budgeting of funds for enforcement of the truck anti-idling program. The Parties recognize that the enforcement of anti-idling regulations is a discretionary act and that nothing in this Consent Judgment limits, in any manner, the City's exercise of its police power under the California Constitution. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request. The City recognizes that this measure applies on a City-wide basis and is not solely applicable to the Project.

The RPIs agree to pay the City a total of $30,000 toward the costs associated with the City's code enforcement program.

6. **Clean Trucks:** In place of Plot Plan 17788 Condition of Approval 10.Planning.52 (which applies *only* to Plot Plan 17788), RPIs agree that the developers/owners of *all* Project plot plans shall establish a diesel minimization plan requiring that at least 90 percent of the trucks with GVWR greater than 16,000 lbs. that both visit the Project site and are owned or operated by a tenant of one of the Plot Plan buildings, shall meet or exceed 2007 model year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1,

Article 4.5, Section 2025. From the date the Consent Judgment is entered and for ten years thereafter, Project tenants who own or operate the trucks described above shall maintain evidence of compliance with the diesel minimization plan, including license plates, engine model year, retrofit technology if applicable, and engine family name. Evidence of compliance shall be available for inspection upon reasonable notice provided to the owner/operator of a request to inspect such documentation. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

7. **Buffers:** RPIs agree that Plot Plan 18876 shall include a partially landscaped setback between the Mira Loma Village houses and the buildings within Plot Plan 18876 along the northern boundary of Mira Loma Village. The setback shall be as determined by the property owner but in no event shall be less than sixty-six (66) feet wide as measured from the edge of the buildings within Plot Plan 18876 to the existing wall separating Mira Loma Village from Plot Plan 18876. Concurrent with the construction of Plot Plan buildings adjacent to the Mira Loma Village, RPIs agree to enhance the vegetative portions of the setback and buffer zones along the northern and eastern boundaries of Mira Loma Village within the Project site. Specifically, RPIs will plant and maintain a vegetative buffer zone along the northern boundary of the Mira Loma Village (in Plot Plan 18876) in a manner determined by the property owner, but including not less than twenty 24" box California Pepper Trees and ten 24" box Bottlebrush Trees (these trees having been selected by CCAEJ in order to reduce diesel particulate matter.) Additionally, Plot Plan 18876 shall include not fewer than eight 24" box Sycamore Trees in its parking lot adjacent to the northern boundary of Mira Loma Village. The RPIs further agree to, concurrent with the construction of Plot Plan buildings adjacent to the Mira Loma Village, landscape the areas being dedicated by the Project as public parks near the Mira Loma Village's eastern boundary (a total of approximately 52,000 square feet) with drought tolerant plants, including not less than 50% Buffalo Grass turf by area, and, further, to provide a vegetative buffer in those park areas and along the remainder of the Mira Loma Village's eastern edge, including not less than eight 24" box American Sycamore trees, twenty 24" box California Pepper Trees, and not fewer than fifteen 24" box Bottlebrush trees (each tree type having been selected by CCAEJ in order to reduce diesel particulate matter). Additionally, Plot Plans 18877 and 18879 shall include a combined total of not less than eight 24" box American Sycamore trees in their parking lots adjacent to the eastern boundary of Mira Loma Village. Additionally, RPIs agree to modify the Project buildings immediately adjacent to the Mira Loma Village's northern boundary by reducing the elevated building parapets in order to reduce visual impacts. Finally, RPIs shall offer not less than two 24" box shade trees to each of the ten property owners who own a home immediately adjacent to the southern boundary of Plot Plan 18876. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

8. **Photovoltaic Installation:** RPIs agree that all Project buildings in excess of 100,000 square feet will be constructed as solar-ready buildings (including the upgrade of building structural, electrical and roofing systems in a manner sufficient to support the

installations of photovoltaic solar systems). RPIs also agree to apply to Southern California Edison's ("SCE") solar program and to other programs that may provide financing for the installation of solar photovoltaic systems ("PV Systems") on the Project site. To the extent that RPIs obtain a grant or rebate providing a financial offset for the cost of PV Systems, RPIs shall install PV solar capacity up to the amount of the grant or rebate but in no event would the PV Systems be less than 100 kW. To the extent that RPIs do not obtain a grant or rebate, RPIs shall install one or more PV Systems on the Project site providing a Project-wide total of 100 kW capacity. In the event that there are alternatives to PV Systems deemed reasonably equivalent in reducing/offsetting global greenhouse affects, if the alternatives are approved by the Attorney General's Office and CCAEJ, the RPIs may at their election implement those in place of the PV Systems. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

9. **Air Monitoring:** RPIs agree to provide a total of $85,000 in order to fund activities related to measuring black carbon levels and/or other indicators of diesel particulate matter in the Mira Loma Village vicinity, including the installation and maintenance of an air monitoring station. RPIs' provision of funding shall constitute its sole obligation with regard to this term. Any air monitoring data from the air monitoring station shall be made available to CCAEJ and SCAQMD in a manner to be determined by CCAEJ and SCAQMD during the design and installation of the air monitoring station. The air monitoring funds will be deposited by RPIs into the Trust Account described in Paragraph 12 of this Exhibit. In the event that CCAEJ, in consultation with SCAQMD, determines that the air monitoring activities will not be effective or necessary, or that the use of the funds for other mitigation, such as the donation of the funds to the City of Jurupa Valley for the completion of the Restricted Truck Route term is preferable, the funds designated for air monitoring in the Trust Account will be available to fund such other mitigation to reduce the Project's air quality impacts, as determined by CCAEJ in consultation with the Attorney General's Office and SCAQMD. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

10. **Electrification:** RPIs agree to install and maintain a minimum of two Level 2 Electric Vehicle Supply Equipment ("EVSE') at each Plot Plan with buildings in excess of 100,000 square feet, placed in a manner that allows charging of trucks or vehicles at each loading dock of the building or at a separate parking area on each Plot Plan. RPIs agree that each Project building in excess of 100,000 square feet will be constructed with necessary infrastructure (conduit and electrical capacity) to support the installation of one Level 3 EVSE (DC Fast Charging) per building. Additionally, the owners/developers of Plot Plan 17788 agree to pay for one Level 3 charging station, at an approximate cost of $75,000, to be installed by the owners/developers of that Plot Plan concurrent with the Plot Plan's construction. However, within thirty (30) days of the execution of this Settlement by the Parties, the CCAEJ may elect to have the owners/developers of Plot Plan 17788 deposit an additional sum of $75,000 into the Trust Account to be put towards additional air quality mitigation, with the deposit of the

funds being required at the time that Plot Plan 17788 receives a building permit. Such election shall be made in writing, and the notice of any such election shall be provided in the manner identified in the "Notices" term of the Consent Judgment. To the extent that no written election is made, then the owners/developers of Plot Plan 17788 shall install one Level 3 charging station as specified above. To the extent that a written election is made, the deposit of the $75,000 into the Trust Account would absolve Plot Plan 17788 from the requirement identified herein to pay for one Level 3 charging station. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

11. Green Building: RPIs agree to construct Project buildings in excess of 100,000 square feet at a LEED Silver or higher level. As part of its settlement of the Litigation, RPIs have specifically requested the City to include this term as a mitigation measure for the Project as set forth in Attachment 1 to this Exhibit, and the City agrees to honor RPIs' request.

12. Mira Loma Mitigation Trust Account: Within thirty (30) days of the entry of the Consent Judgment, the RPIs and CCAEJ shall execute a written trust agreement establishing the Mira Loma Mitigation Trust Account ("Trust Account") to be administered by CCAEJ. Thereafter, upon 1) the issuance of the first building permit for any of the Project's Plot Plans or 2) four (4) weeks prior to the commencement of grading within Plot Plans 18876 or 18877, whichever occurs first, the RPIs shall deposit a total of $303,100 into the Trust Account, which includes $175,100 for Air Filtration Systems and $43,000 for Trust Account administration costs as identified in Paragraph 4 of this Exhibit A, and $85,000 for Air Monitoring activities as defined in Paragraph 9 of this Exhibit A. The governing purpose of the Trust Account shall be to fund mitigation to evaluate and/or reduce the localized air quality impacts of the Project, and to cover any administrative costs incurred by the CCAEJ in managing the trust account. Specifically, the monies in the Trust Account shall be allocated in a manner to fund the measures described in Paragraphs 4 and 9 of this Exhibit. In the event that CCAEJ, in consultation with SCAQMD, determines that there are insufficient funds for certain mitigation, that the mitigation is unnecessary, or that other mitigation is preferable, the funds in the Trust Account will be available to fund other mitigation to reduce the Project's air quality impacts, such as the Restricted Truck Route ordinance described in Paragraph 3 above, as determined by CCAEJ in consultation with the Attorney General's Office and SCAQMD. The administration of the Trust Account shall be consistent with applicable laws and regulations governing trust regulations. The Trust Account shall be maintained for four years following the entry of the Consent Judgment. To the extent that funds within the Trust Account are not exhausted by the end of that four year period, the funds shall be distributed to CCAEJ to be used at CCAEJ's discretion, in consultation with the Attorney General's Office and SCAQMD, to evaluate and/or reduce the Project's localized air quality impacts.

13. Parties' Support for City's Efforts to Implement Settlement: Each of the Parties hereto, except the People, agrees to publically express their support in written or oral communications to the City Council for the City's efforts to fulfill its obligations to implement the requirements of this Consent Judgment; provided, however, that the

Parties shall retain their rights to object to an action or proposed action of the City Council or the City Staff that the Party does not believe fulfills the City's obligation under this Consent Judgment.

Attachment 1

(Revised Mitigation Monitoring and Reporting Program)

Consent Judgment Mitigation Monitoring and Reporting Program

Consent Judgment – Mitigation Measures

The following Mitigation Monitoring and Reporting Program reflects mitigation measures that have been added and imposed through the Riverside County Superior Court's entry of a Consent Judgment in the matter styled *Center for Community Action and Environmental Justice (CCAEJ) et al. v. County of Riverside et al.* (Riverside County Superior Court Case Number 1112063), which challenged the approval of Plot Plans 16979, 17788, 18875, 18876, 18877, and 18879 on California Environmental Quality Act and other grounds. These mitigation measures are mandatory and binding on each of the Project Plot Plans, unless specified otherwise herein. In the event of a conflict between this MMRP and the Consent Judgment, the Consent Judgment shall control. This Consent Judgment Mitigation Monitoring and Reporting Program applies in addition to – not in place of – the MMRP that was previously adopted for the Project by the County of Riverside on June 14, 2011.

Impact Category	Mitigation Measure	Implementation Timing	Monitoring/ Reporting Method	Responsible Monitoring Party
Air Quality and Greenhouse Gases	**Restricted Truck Route Ordinance**. The City shall use its best efforts to conduct proceedings for the adoption of an ordinance restricting trucks with gross vehicle weight rating (GVWR) over 16,000 lbs. from accessing the portion of Etiwanda Avenue adjacent to Mira Loma Village (between the 60 Freeway and Hopkins Street). The restricted truck route ordinance proceedings shall comply with the California Environmental Quality Act (CEQA), and may include a study to determine if there are potential alternate routes for trucks with GVWR over 16,000 lbs on roadways other than Etiwanda Avenue described above.	Within fifteen (15) months of the entry of the Consent Judgment.	Any proceeding to adopt such an ordinance shall be publicly noticed.	City of Jurupa Valley
	Restricted Truck Route Ordinance Alternative. In the event that the City does not adopt a restricted truck route ordinance within two years of the entry of the Consent Judgment, the Project Applicants shall request of all initial tenants, in writing, that any trucks accessing the Project site with	Two years following the entry of the Consent Judgment.	The Project Applicants shall copy the City on their written request.	City of Jurupa Valley

	GVWR over 16,000 lbs. owned or operated by tenants of the Project buildings avoid traveling on the portion of Etiwanda Avenue adjacent to Mira Loma Village (between the 60 Freeway and Hopkins Street).			
	Restricted Truck Route Payment. The Project Applicants shall deposit $20,000 into an escrow account opened pursuant to the Consent Judgment for the cost of the study and environmental review associated with the consideration of a restricted truck route ordinance.	Following the City's execution of a contract with a consultant retained to study and prepare environmental documentation of the restricted truck route and within ten (10) days of the City's provision of written notice to the Project Applicants of the same.	The City shall notify Project Applicants in writing of the City's execution of a contract with a consultant.	City of Jurupa Valley
Air Quality and Greenhouse Gases	**Air Filtration Systems**. The Project Applicants shall fund the purchase, installation and maintenance of in-home air filtration systems for each qualifying residential parcel within Mira Loma Village at a cost of $1,700 per parcel, plus an additional $43,000 sum to cover administration costs. "Qualifying residential parcels" are the 103 eligible residential parcels reflected in the map attached to the Consent Judgment as Attachment 2. The air filtration systems shall be selected by the owners of each parcel, although recommendations as to the filtration systems selected may be provided to the parcel owners by the CCAEJ in consultation with the South Coast Air Quality Management District (SCAQMD). In the event that CCAEJ, in consultation with SCAQMD, determines that the air filtration systems will not be effective or necessary, the funds designated for air filtration systems in the Trust Account will be available to fund other mitigation to reduce the Project's air quality impacts, as determined by CCAEJ in consultation with the Attorney General's Office and SCAQMD. If the air filtration systems are determined by CCAEJ to be effective, then, the designated funds in the Trust Account shall be distributed to Mira	Within thirty (30) days of the entry of the Consent Judgment, the Project Applicants and CCAEJ shall execute a written trust agreement establishing the Mira Loma Mitigation Trust Account ("Trust Account") to be administered by CCAEJ. Thereafter, upon 1) the issuance of the first building permit for any of the Project's Plot Plans or 2) four (4) weeks prior to the commencement of grading within Plot Plans 18876 or 18877, whichever occurs first, the Project Applicants shall deposit into the Trust Account $175,100 for Air Filtration Systems and $43,000 for Trust Account administration costs.	Trustee shall provide written confirmation of deposit to CCAEJ in the manner required in the written trust agreement.	CCAEJ

	Loma Village residents upon presentation to the trust administrator of evidence showing that the resident is a parcel owner and receipts documenting air filtration system purchase, installation, and/or maintenance costs and/or expenditures on other air quality mitigation expenditures. Similarly, designated funds in the Trust Account may also be distributed directly to air filtration contractors or installers upon presentation to the trust administrator of an invoice or other evidence documenting that the contractor or installer has – on behalf of the parcel owner – purchased, installed, or maintained an air filtration system or made other air quality mitigation expenditures.			
Air Quality and Greenhouse Gases	**Anti-Idling Enforcement**. Within seven (7) months from the entry of the Consent Judgment, the City agrees to use its best efforts to implement a program to enforce the Air Resources Board's ("ARB") anti-idling regulation (Cal. Code Regs., tit. 13, § 2485) either through its enforcement of the ARB Regulations or through its adoption of a City truck anti-idling ordinance. The City further agrees to the hiring/assigning of a code enforcement officer, whose duties shall include the enforcement of ARB's anti-idling regulation on a City-wide basis, including the vicinity of the Project. The extent of enforcement activity and the hiring or assigning of a code enforcement officer for the truck anti-idling enforcement program shall be subject to the City Council's discretion in establishing budget priorities for the City and the consequent budgeting of funds for enforcement of the truck anti-idling program. Such measure shall apply on a City-wide basis and is not solely applicable to the Project.	Within thirty (30) days of the entry of the Consent Judgment, the Project Applicants shall deposit $30,000 into an escrow account opened pursuant to the Consent Judgment. Within seven (7) months from the entry of the Consent Judgment, the City agrees to use its best efforts to implement the program called for by this measure.	Escrow Company shall provide written confirmation of deposit to City and Project Applicants.	City of Jurupa Valley
Air Quality and Greenhouse Gases	**Clean Trucks**. In place of Plot Plan 17788 Condition of Approval 10.PLANNING.52 (which applies *only* to Plot Plan 17788), the	The diesel minimization plan shall be put in place for each Plot Plan prior to the commencement of the operation of diesel	The Project tenants shall maintain evidence of	City of Jurupa Valley

	Project Applicants shall establish a diesel minimization plan requiring that at least ninety percent (90%) of the trucks with GVWR greater than 16,000 lbs. that both visit the Project site and are owned or operated by a tenant of one of the Plot Plan buildings, shall meet or exceed 2007 model year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. The diesel minimization plan shall include a provision that requires Project tenants who own or operate trucks of the size described above to maintain evidence of compliance with the diesel minimization plan, including license plates, engine model year, retrofit technology if applicable, and engine family name. Evidence of compliance shall be available for inspection upon reasonable notice provided to the owner/operator of a request to inspect such documentation.	trucks with GVWR greater than 16,000 lbs. that both visit the Project site and are owned or operated by a tenant of one of the Plot Plan buildings From the date that the Consent Judgment is entered and for ten (10) years thereafter, Project tenants shall maintain the requisite evidence of compliance called for in the Clean Trucks Mitigation Measures.	compliance.	
Air Quality, Greenhouse Gases, and Aesthetic Impacts	**Buffers for Plot Plan 18876**. The owner/developer of Plot Plan 18876 shall include a partially landscaped setback between the Mira Loma Village houses and the buildings within Plot Plan 18876 along the northern boundary of Mira Loma Village. The setback shall be as determined by the property owner but in no event shall be less than sixty-six (66) feet wide as measured from the edge of the buildings within Plot Plan 18876 to the existing wall separating Mira Loma Village from Plot Plan 18876. Concurrent with the construction of Plot Plan buildings adjacent to the Mira Loma Village, the Project Applicants shall enhance the vegetative portions of the setback and buffer zones along the northern and eastern boundaries of Mira Loma Village within the Project site. Specifically, the Project Applicants shall plant and maintain a	Prior to issuance of first certificate of occupancy on Plot Plan 18876.	Confirmation prior to issuance of first certificate of occupancy on Plot Plan 18876.	City of Jurupa Valley

	vegetative buffer zone along the northern boundary of the Mira Loma Village (in Plot Plan 18876) in a manner determined by the property owner, but including not less than twenty 24" box California Pepper Trees and ten 24" box Bottlebrush trees. Additionally, Plot Plan 18876 shall include not fewer than eight 24" box Sycamore Trees in its parking lot adjacent to the northern boundary of Mira Loma Village. Furthermore, the Project Applicants shall, concurrent with the construction of Plot Plan buildings adjacent to the Mira Loma Village, landscape areas being dedicated by the Project as public parks near the Mira Loma Village's eastern boundary (a total of approximately 52,000 square feet) with drought tolerant plants, including not less than 50% Buffalo Grass turf by area, and, further, to provide a vegetative buffer in those park areas and along the remainder of the Mira Loma Village's eastern edge, including not less than eight 24" box American Sycamore trees, twenty 24" box California Pepper Trees, and not fewer than fifteen 24" box Bottlebrush trees. Finally, the Project Applicants shall offer not less than two 24" box shade trees to each of the ten property owners who own a home immediately adjacent to the southern boundary of Plot Plan 18876			
	Buffers for Plot Plans 18877 and 18879. Additionally, Plot Plans 18877 and 18879 shall include a combined total of not less than eight 24" box American Sycamore trees in their parking lots adjacent to the eastern boundary of Mira Loma Village.	Prior to issuance of first certificate of occupancy on Plot Plans 18877 and 18879.	Confirmation prior to issuance of first certificate of occupancy on Plot Plans 18877 and 18879.	City of Jurupa Valley
	Additional Buffer. Additionally, the Project Applicants shall modify the Project buildings immediately adjacent to the Mira Loma Village's northern boundary by reducing the	Prior to issuance of first certificate of occupancy for Plot Plan 18876.	Confirmation prior to issuance of first certificate of occupancy.	City of Jurupa Valley

	elevated building parapets in order to reduce visual impacts.			
Air Quality and Greenhouse Gases	**Photovoltaic Installation**. All Project building in excess of 100,000 square feet shall be constructed as solar ready buildings (including the upgrade of building structural, electrical and roofing systems in a manner sufficient to support the installations of photovoltaic solar systems).	Prior to the issuance of the certificate of occupancy for each building over 100,000 square feet.	Confirmation prior to issuance of first certificate of occupancy for each building over 100,000 square feet.	City of Jurupa Valley
	The Project Applicants shall apply to Southern California Edison's ("SCE") solar program and to other programs that may provide financing for the installation of solar photovoltaic systems ("PV Systems") on the Project site. To the extent that the Project Applicants obtain a grant or rebate providing a financial offset for the cost of the PV Systems, the Project Applicants shall install PV solar capacity up to the amount of the grant or rebate but in no event would the PV Systems be less than 100 kW. To the extent that the Project Applicants do not obtain a grant or rebate, the Project Applicants shall install one or more PV Systems on the Project site providing a Project-wide total of 100 kW capacity. In the event that there are alternatives to the PV Systems deemed reasonably equivalent in reducing/offsetting global greenhouse affects, if the alternatives are approved by the Attorney General's Office and CCAEJ, the Project Applicants may at their election implement those in place of the PV Systems.	The Project Applicants shall submit an application to SCE prior to the issuance of the first certificate of occupancy for any building in excess of 100,000 square feet. Installation of the system shall occur prior to the issuance of the last certificate of occupancy for any Project building.	The Project Applicants shall submit to the City copies of the Project Applicants' completed SCE applications.	City of Jurupa Valley
Air Quality and Greenhouse Gases	**Air Monitoring**. The Project Applicants shall contribute $85,000 in order to (1) fund activities related to measuring black carbon levels and/or other indicators of diesel particulate matter in the Mira Loma Village vicinity, including the installation and maintenance of an air monitoring station; and/or (2) provide additional funds which	Within thirty (30) days of the entry of the Consent Judgment, the Project Applicants and CCAEJ shall execute a written trust agreement establishing the Mira Loma Mitigation Trust Account ("Trust Account") to be administered by CCAEJ. Thereafter, upon 1) the issuance of the first building permit for any of the Project's Plot Plans or	Air monitoring data from the air monitoring station shall be made available to the CCAEJ and SCAQMD in a manner to be determined by CCAEJ and SCAQMD during the	CCAEJ/SCAQMD

	may be made available to the City of Jurupa Valley in order to complete the Restricted Truck Route term. In the event that the CCAEJ, in consultation with SCAQMD, determines that the air monitoring activities will not be effective or necessary, or that the donation of the funds to the City of Jurupa Valley for the completion of the Restricted Truck Route term is preferable, the funds designated for air monitoring in the Trust Account will be available to fund such other mitigation to reduce the Project's air quality impacts, as determined by CCAEJ in consultation with the Attorney General's Office and SCAQMD.	2) four (4) weeks prior to the commencement of grading within Plot Plans 18876 or 18877, whichever occurs first, the Project Applicants shall deposit into the Trust Account $85,000 for Air Monitoring activities.	design and installation of the air monitoring station.	
Air Quality and Greenhouse Gases	**Electrification**. Project Applicants agree to install and maintain a minimum of two Level 2 Electric Vehicle Supply Equipment ("EVSE') at each Plot Plan with buildings in excess of 100,000 square feet, placed in a manner that allows charging of trucks or vehicles at each loading dock of the building or at a separate parking area on each Plot Plan. Project Applicants agree that each Project building in excess of 100,000 square feet will be constructed with necessary infrastructure (conduit and electrical capacity) to support the installation of one Level 3 EVSE (DC Fast Charging) per building.	Prior to the issuance of the first certificate of occupancy for each building over 100,000 square feet.	Confirm prior to issuance of first certificate of occupancy for each building over 100,000 square feet.	City of Jurupa Valley
	Electrification for Plot Plan 17788. The owners/developers of Plot Plan 17788 agree to pay for one Level 3 charging station, at an approximate cost of $75,000, to be installed by the owners/developers of that Plot Plan concurrent with the Plot Plan's construction. However, within thirty (30) days of the execution of this Settlement by the Parties, the CCAEJ may elect to have the	Prior to the issuance of any certificate of occupancy for Plot Plan 17788.	Confirm prior to issuance of certificate of occupancy for Plot Plan 17788.	City of Jurupa Valley

	owners/developers of Plot Plan 17788 deposit an additional sum of $75,000 into the Trust Account to be put towards additional air quality mitigation, with the deposit of the funds being required at the time that Plot Plan 17788 receives a building permit. Such election shall be made in writing, and the notice of any such election shall be provided in the manner identified in the "Notices" term of the Consent Judgment. To the extent that no written election is made, then the owners/developers of Plot Plan 17788 shall install one Level 3 charging station as specified above. To the extent that a written election is made, the deposit of the $75,000 into the Trust Account would absolve Plot Plan 17788 from the requirement identified herein to pay for one Level 3 charging station.			
Air Quality and Greenhouse Gases	**Green Building**. The Project Applicants shall construct Project buildings in excess of 100,000 square feet at a LEED Silver or higher level.	Prior to the issuance of a certificate of occupancy for any building over 100,000 square feet.	Confirm prior to issuance of a certificate of occupancy for any building over 100,000 square feet.	City of Jurupa Valley

Attachment 2

(Map of the Mira Loma Village's 103 Residential Parcels)



Mira Loma Village

EXHIBIT B

(Environmental Justice at the Local and Regional Level – Legal Background (Office of the Attorney General - July 10, 2012)

KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE



Environmental Justice at the Local and Regional Level
Legal Background

Cities, counties, and other local governmental entities have an important role to play in ensuring environmental justice for all of California's residents. Under state law:

> "[E]nvironmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

(Gov. Code, § 65040.12, subd. (e).) Fairness in this context means that the *benefits* of a healthy environment should be available to everyone, and the *burdens* of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.

Many local governments recognize the advantages of environmental justice; these include healthier children, fewer school days lost to illness and asthma, a more productive workforce, and a cleaner and more sustainable environment. Environmental justice cannot be achieved, however, simply by adopting generalized policies and goals. Instead, environmental justice requires an ongoing commitment to identifying existing and potential problems, and to finding and applying solutions, both in approving specific projects and planning for future development.

There are a number of state laws and programs relating to environmental justice. This document explains two sources of environmental justice-related responsibilities for local governments, which are contained in the Government Code and in the California Environmental Quality Act (CEQA).

Government Code

Government Code section 11135, subdivision (a) provides in relevant part:

> No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state....

While this provision does not include the words "environmental justice," in certain circumstances, it can require local agencies to undertake the same consideration of fairness in the distribution of environmental benefits and burdens discussed above. Where, for example, a general plan update is funded by or receives financial assistance from the state or a state agency, the local government should take special care to ensure that the plan's goals, objectives, policies

and implementation measures (a) foster equal access to a clean environment and public health benefits (such as parks, sidewalks, and public transportation); and (b) do not result in the unmitigated concentration of polluting activities near communities that fall into the categories defined in Government Code section 11135.[1] In addition, in formulating its public outreach for the general plan update, the local agency should evaluate whether regulations governing equal "opportunity to participate" and requiring "alternative communication services" (*e.g.*, translations) apply. (See Cal. Code Regs., tit. 22, §§ 98101, 98211.)

Government Code section 11136 provides for an administrative hearing by a state agency to decide whether a violation of Government Code section 11135 has occurred. If the state agency determines that the local government has violated the statute, it is required to take action to "curtail" state funding in whole or in part to the local agency. (Gov. Code, § 11137.) In addition, a civil action may be brought in state court to enforce section 11135. (Gov. Code, § 11139.)

California Environmental Quality Act (CEQA)

Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects ...." (Pub. Res. Code, § 21002.) Human beings are an integral part of the "environment." An agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly[.]" (Pub. Res. Code, § 21083, subd. (b)(3); see also CEQA Guidelines,[2] § 15126.2 [noting that a project may cause a significant effect by bringing people to hazards].)

CEQA does not use the terms "fair treatment" or "environmental justice." Rather, CEQA centers on whether a project may have a significant effect on the physical environment. Still, as set out below, by following well-established CEQA principles, local governments can further environmental justice.

CEQA's Purposes

The importance of a healthy environment for all of California's residents is reflected in CEQA's purposes. In passing CEQA, the Legislature determined:

- "The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern." (Pub. Res. Code, § 21000, subd. (a).)

- We must "identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds from being reached." (*Id.* at subd. (d).)

---

[1] To support a finding that such concentration will not occur, the local government likely will need to identity candidate communities and assess their current burdens.

[2] The CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15000, et seq.) are available at http://ceres.ca.gov/ceqa/.

- "[M]ajor consideration [must be] given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian." (*Id.* at subd. (g).)

- We must "[t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise." (Pub. Res. Code, § 21001, subd. (b).)

Specific provisions of CEQA and its Guidelines require that local lead agencies consider how the environmental and public health burdens of a project might specially affect certain communities. Several examples follow.

Environmental Setting and Cumulative Impacts

There are a number of different types of projects that have the potential to cause physical impacts to low-income communities and communities of color. One example is a project that will emit pollution. Where a project will cause pollution, the relevant question under CEQA is whether the environmental effect of the pollution is significant. In making this determination, two long-standing CEQA considerations that may relate to environmental justice are relevant – setting and cumulative impacts.

It is well established that "[t]he significance of an activity depends upon the setting." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718 [citing CEQA Guidelines, § 15064, subd. (b)]; see also *id.* at 721; CEQA Guidelines, § 15300.2, subd. (a) [noting that availability of listed CEQA exceptions "are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant."]) For example, a proposed project's particulate emissions might not be significant if the project will be located far from populated areas, but may be significant if the project will be located in the air shed of a community whose residents may be particularly sensitive to this type of pollution, or already are experiencing higher-than-average asthma rates. A lead agency therefore should take special care to determine whether the project will expose "sensitive receptors" to pollution (see, e.g., CEQA Guidelines, App. G); if it will, the impacts of that pollution are more likely to be significant.[3]

In addition, CEQA requires a lead agency to consider whether a project's effects, while they might appear limited on their own, are "cumulatively considerable" and therefore significant. (Pub. Res. Code, § 21083, subd. (b)(3).) "'[C]umulatively considerable' means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future

[3] "[A] number of studies have reported increased sensitivity to pollution, for communities with low income levels, low education levels, and other biological and social factors. This combination of multiple pollutants and increased sensitivity in these communities can result in a higher cumulative pollution impact." Office of Environmental Health Hazard Assessment, *Cumulative Impacts: Building a Scientific Foundation* (Dec. 2010), Exec. Summary, p. ix, available at http://oehha.ca.gov/ej/cipa123110.html.

projects." (*Id.*) This requires a local lead agency to determine whether pollution from a proposed project will have significant effects on any nearby communities, when considered together with any pollution burdens those communities already are bearing, or may bear from probable future projects. Accordingly, the fact that an area already is polluted makes it *more likely* that any additional, unmitigated pollution will be significant. Where there already is a high pollution burden on a community, the "relevant question" is "whether any additional amount" of pollution "should be considered significant in light of the serious nature" of the existing problem. (*Hanford, supra*, 221 Cal.App.3d at 661; see also *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025 [holding that "the relevant issue ... is not the relative amount of traffic noise resulting from the project when compared to existing traffic noise, but whether any additional amount of traffic noise should be considered significant in light of the serious nature of the traffic noise problem already existing around the schools."])

The Role of Social and Economic Impacts Under CEQA

Although CEQA focuses on impacts to the physical environment, economic and social effects may be relevant in determining significance under CEQA in two ways. (See CEQA Guidelines, §§ 15064, subd. (e), 15131.) First, as the CEQA Guidelines note, social or economic impacts may lead to physical changes to the environment that are significant. (*Id.* at §§ 15064, subd. (e), 15131, subd. (a).) To illustrate, if a proposed development project may cause economic harm to a community's existing businesses, and if that could in turn "result in business closures and physical deterioration" of that community, then the agency "should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (See *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 446.)

Second, the economic and social effects of a physical change to the environment may be considered in determining whether that physical change is significant. (*Id.* at §§ 15064, subd. (e), 15131, subd. (b).) The CEQA Guidelines illustrate: "For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant." (*Id.* at § 15131, subd. (b); see also *id.* at § 15382 ["A social or economic change related to a physical change may be considered in determining whether the physical change is significant."])

Alternatives and Mitigation

CEQA's "substantive mandate" prohibits agencies from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that would substantially lessen or avoid those effects. (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134.) Where a local agency has determined that a project may cause significant impacts to a particular community or sensitive subgroup, the alternative and mitigation analyses should address ways to reduce or eliminate the project's impacts to that community or subgroup. (See CEQA Guidelines, § 15041, subd. (a) [noting need for "nexus" between required changes and project's impacts].)

Depending on the circumstances of the project, the local agency may be required to consider alternative project locations (see *Laurel Heights Improvement Assn. v. Regents of University of*

California (1988) 47 Cal.3d 376, 404) or alternative project designs (see *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1183) that could reduce or eliminate the effects of the project on the affected community.

The lead agency should discuss and develop mitigation in a process that is accessible to the public and the affected community. "Fundamentally, the development of mitigation measures, as envisioned by CEQA, is not meant to be a bilateral negotiation between a project proponent and the lead agency after project approval; but rather, an open process that also involves other interested agencies and the public." (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.) Further, "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments." (CEQA Guidelines, § 15126.4, subd. (a)(2).)

As part of the enforcement process, "[i]n order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented," the local agency must also adopt a program for mitigation monitoring or reporting. (CEQA Guidelines, § 15097, subd. (a).) "The purpose of these [monitoring and reporting] requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." (*Federation of Hillside and Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.) Where a local agency adopts a monitoring or reporting program related to the mitigation of impacts to a particular community or sensitive subgroup, its monitoring and reporting necessarily should focus on data from that community or subgroup.

Transparency in Statements of Overriding Consideration

Under CEQA, a local government is charged with the important task of "determining whether and how a project should be approved," and must exercise its own best judgment to "balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian." (CEQA Guidelines, § 15021, subd. (d).) A local agency has discretion to approve a project even where, after application of all feasible mitigation, the project will have unavoidable adverse environmental impacts. (*Id.* at § 15093.) When the agency does so, however, it must be clear and transparent about the balance it has struck.

To satisfy CEQA's public information and informed decision making purposes, in making a statement of overriding considerations, the agency should clearly state not only the "specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits" that, in its view, warrant approval of the project, but also the project's "unavoidable adverse environmental effects[.]" (*Id.* at subd. (a).) If, for example, the benefits of the project will be enjoyed widely, but the environmental burdens of a project will be felt particularly by the neighboring communities, this should be set out plainly in the statement of overriding considerations.

* * * *

The Attorney General's Office appreciates the leadership role that local governments have played, and will continue to play, in ensuring that environmental justice is achieved for all of California's residents. Additional information about environmental justice may be found on the Attorney General's website at http://oag.ca.gov/environment.

LAW OFFICES OF
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PROOF OF SERVICE

At the time of service I was over 18 years of age and not a party to this action. My business address is 3390 University Avenue, 5th Floor, P.O. Box 1028, Riverside, California 92502. On February 8, 2013,0 I served the following document(s):

[PROPOSED] CONSENT JUDGMENT

☐ **By fax transmission.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.

☒ **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed below (specify one):

☒ Placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

☐ **By messenger service.** I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a professional messenger service for service. A Declaration of Messenger is attached.

☐ **By overnight delivery.** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed below. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 8, 2013, at Riverside, California.

Lynda A. Byrd

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EXHIBIT G

GUIDE FOR ASSESSING AND MITIGATING AIR QUALITY IMPACTS

Prepared by
the Mobile Source/CEQA Section
of the Planning Division
of the San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, CA 93726

January 10, 2002 revision
Adopted August 20, 1998

This document is an advisory document, that provides Lead Agencies, consultants, and project applicants with uniform procedures for addressing air quality in environmental documents. Copies and updates are available from the SJVAPCD Planning Division at (559) 230-5800. Questions on content should be addressed to either the Mobile Source/ CEQA Section at (559) 230-5800 or the SJVAPCD CEQA representative at the regional office that covers the county in which the project is located.

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GUIDE FOR ASSESSING AND MITIGATING AIR QUALITY IMPACTS

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SECTION 1 – INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

The *Guide for Assessing and Mitigating Air Quality Impacts* (GAMAQI) is an advisory document, that provides Lead Agencies, consultants, and project applicants with uniform procedures for addressing air quality in environmental documents. The GAMAQI contains the following components:

- SJVAPCD's role as a commenting agency or responsible agency (Section 2);
- Preliminary project review - actions Lead Agencies can take to reduce air quality impacts prior to beginning the California Environmental Quality Act (CEQA) process (Section 3);
- Criteria and thresholds for determining whether a project may have a significant adverse air quality impact (Section 4);
- Specific procedures and modeling protocols for quantifying and analyzing air quality impacts (Section 5);
- Methods available to mitigate air quality impacts (Section 6);
- Information for use in air quality assessments and EIRs that will be updated more frequently such as air quality data, regulatory setting, climate, topography, etc. (Technical Document).

Authority to Comment. The San Joaquin Valley Air Pollution Control District (SJVAPCD), which is comprised of the San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, and Tulare Counties and the Valley portion of Kern County (see Figure 1-1)[1], has jurisdiction over most air quality matters in the San Joaquin Valley Air Basin (SJVAB). The SJVAPCD is tasked with implementing certain programs and regulations required by the Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA). The SJVAPCD prepares plans to attain state and national ambient air quality standards. In order to accomplish its mandates the SJVAPCD maintains a staff of planners and technical personnel versed in the various aspects of air pollution control and analysis.

The SJVAPCD *1991 Air Quality Attainment Plan* (AQAP) includes a control measure for an enhanced CEQA review program. The program requires the SJVAPCD to provide technical assistance to Lead Agencies in addressing air quality issues in environmental

[1] This information and other information about the SJVAPCD's programs are also available on the District's Website at (http://www.valleyair.org)

Figure 1-1

San Joaquin Valley Air Pollution Control District Boundaries



documents and to comment on project air quality impacts. In addition, the SJVAPCD suggests mitigation measures to reduce air quality impacts of development projects.

The Air Pollution Problem. The SJVAB has one of the most severe air pollution problems in the State of California and the nation. Air pollution is hazardous to health, diminishes the production and quality of many agricultural crops, reduces visibility, degrades or soils materials, and damages native vegetation. State and national ambient air quality standards were created to protect the public health and welfare, and to minimize the other effects mentioned above. The standards address pollutants in the ambient air, the air that people breathe outside of buildings, as they go about their daily activities. The SJVAB does not meet the standards for ozone and respirable particulate matter (PM-10). In recent years the standard for carbon monoxide (CO) has not been exceeded in the SJVAB, however, background concentrations are still high enough for CO hot spots to be potential problems in urban areas with high levels of traffic congestion. Further information regarding these pollutants and the status of air quality in the SJVAB is provided throughout this document and the separate Technical Document.

Nearly all development projects in the San Joaquin Valley (SJV), from general plans to individual site plans, have the potential to generate pollutants that will worsen air quality or make it more difficult for state and national air quality attainment standards to be attained. Therefore, for most projects, it is necessary to evaluate air quality impacts to comply with CEQA. The GAMAQI is intended to help public agencies review and evaluate these impacts. A properly prepared CEQA document will inform decision-makers and the public about the air quality impacts of a project and facilitate a public dialogue regarding their implications. It will serve not only to protect the environment, but will also demonstrate to the public that it is being protected.

GAMAQI Limitations. The content of the GAMAQI is focused on the most frequently encountered land use projects. Projects not specifically addressed in terms of analysis methods and mitigation measures include, but are not limited to, highway construction, transportation plans, pipeline development, and dairy construction. The District currently makes recommendations for these types of projects on a case by case basis.

1.2 THE ENVIRONMENTAL REVIEW PROCESS

The California Legislature enacted CEQA in 1970 [Public Resources Code (PRC) §21000 *et seq.*].[2] CEQA requires public agencies (i.e., local, county, regional, and state government) to consider and disclose the environmental effects of their decisions to the public and governmental decision-makers. Further, it mandates that agencies implement feasible mitigation measures or alternatives that would mitigate significant adverse effects to the environment. Finally, CEQA provides a mechanism for disclosing to the public the

[2] In addition, the Secretary of Resources promulgated regulations, known as the State CEQA Guidelines, which provide detailed procedures that agencies must follow to implement CEQA. The CEQA Guidelines are contained in the California Code of Regulations (CCR), Title 14, Chapter 3, Sections 15000 *et seq*.

reasons why a governmental agency approved a project if significant environment effects are involved.

Perhaps the best-known application of CEQA is the requirement that a public agency prepare an Environmental Impact Report (EIR) whenever a project has the potential to create significant effects on the environment. The purpose of an EIR is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided"[3].

CEQA requires public agencies to address the full range of environmental issues, including water quality, noise, land use, natural resources, transportation, energy, human health, and air quality. The guidance that follows addresses air quality analyses under CEQA. However, it also has implications for analyses of human health, water quality, risks of upset, and other environmental areas related to air quality.

1.3 DISTRICT'S ROLE IN CEQA

For each project under CEQA, the SJVAPCD has one of three roles: Lead Agency, Responsible Agency, or a commenting agency.

Lead Agency. The SJVAPCD acts as a Lead Agency when it has principal responsibility to carry out or approve a project. This typically occurs when it develops rules, regulations, and air quality plans. The SJVAPCD may also become a Lead Agency for projects requiring SJVAPCD approval of discretionary air quality permits and not requiring any discretionary action from any other agency[4]. This may also occur when an environmental document prepared by another Lead Agency is inadequate for the SJVAPCD to act upon.

Responsible Agency. The SJVAPCD acts as a Responsible Agency when it has discretionary power over a project but does not have the principal authority to carry out the project. The SJVAPCD is often a Responsible Agency for development projects that require air pollution control permits. In this capacity, it considers the EIR or Negative Declaration prepared by the Lead Agency and reaches its own conclusions on whether and how to approve the project involved[5]. To ensure that the environmental document is adequate for its use, the SJVAPCD provides comments to the Lead Agency on its air quality analysis and mitigation measures, if applicable.[6] During the EIR process, CEQA provides that the SJVAPCD may comment at three points:

[3] PRC §21002.1
[4] The State CEQA Guidelines [CCR §15051(b)(1)] makes it clear that the Lead Agency will normally be the agency with general governmental powers, not an agency like an air district which is more limited in purpose.
[5] CCR §15096(a)
[6] The State CEQA Guidelines [CCR §15096(a)(2)(d)] states that when commenting on Draft EIRs and Negative Declarations, responsible agencies are limited to those project activities within the agency's area of expertise or which are required to be approved by the agency.

- informally on projects before the formal review process begins;
- in response to the Notice of Preparation that an EIR is being prepared;
- and when the draft EIR is circulated for public review.

To help public agencies and project applicants determine whether air quality permits are required for a project, the SJVAPCD has prepared a list (Figure 1-2) that identifies projects that often require air quality permits. These projects also may be sources of emissions classified as hazardous air pollutants that require screening and, potentially, health risk assessments by the SJVAPCD.

Commenting Agency. The SJVAPCD acts as commenting agency for any project that has the potential to impact air quality and for which it is not a lead or responsible agency.[7] To this end, it regularly provides comments to Lead Agencies that prepare environmental documents.

1.4 REGIONAL OFFICES

The SJVAPCD is officially divided into three regions: northern, central, and southern (see Figure 1-1). The Southern Region consists of Tulare County and the portion of Kern County in the SJVAB and is administered by an office in Bakersfield. The Central Region is composed of Fresno, Kings, and Madera Counties, with the office being located in Fresno. This office also serves as the main headquarters. Merced, Stanislaus, and San Joaquin Counties make up the Northern Region, with an office located in Modesto. **However, the Southern Region is responsible for CEQA activities in Kings County.** All Lead Agencies, consultants, project applicants, or other interested parties should contact the office in their region regarding the SJVAPCD's responsibilities as a Responsible or commenting agency (see Appendix B for contact information.)

1.5 HOW TO USE THE GAMAQI

The GAMAQI is intended for use by Lead Agencies and consultants preparing CEQA air quality documents. The document employs the following structure for easier use and long term utility:

- **Dated Information**. To the greatest extent feasible, information that may change quickly or which needs to be updated frequently is located in a separate Technical Document. Before using information from the technical document, the Lead Agency or consultant should contact the SJVAPCD CEQA staff in the appropriate

[7] CEQA Guidelines [CCR §15044] permits any person or entity that is not a responsible agency to comment to a Lead Agency on any environmental impact of a project.

regional office or the District web site at www.valleyair.org to determine the most up-to-date version.

The entire GAMAQI will be updated periodically as legislative, legal, and technical changes dictate. Updates will be provided in a three-ring binder format for insertion into your current GAMAQI.

Figure 1-2
Examples of Projects Requiring SJVAPCD Air Quality Permits

The SJVAPCD Rule 2010 states that "any person who plans to or does operate, construct, alter, or replace any source of emission of air contaminants" must obtain approval of the Air Pollution Control Officer and receive an Authority to Construct and a Permit to Operate.

Examples of air contaminant emitting equipment and processes include (but are not limited to):

- Agricultural products processing
- Bulk material handling
- Chemical blending, mixing, manufacturing, storage, etc.
- Combustion equipment (boilers, engines, heaters, incinerators, etc.)
- Metals etching, melting, plating, refining, etc.
- Plastics & fiberglass forming and manufacturing
- Petroleum production, manufacturing, storage, and distribution
- Rock & mineral mining and processing
- Solvent use (degreasing, dry-cleaning, etc.)
- Surface coating and preparation (painting, blasting, etc.)

Note: Equipment operated and installed without an Authority to Construct is subject to legal action and fines up to $25,000 for each day of violation.

To obtain assistance in determining if a project is subject to SJVAPCD permit and for information on procedures for obtaining an Authority to Construct, call the SJVAPCD's Small Business Assistance (SBA) Office in the regional District offices:

Northern Office SBA	(209) 557-6446
Central Office SBA	(559) 230-5888
Southern Office SBA	(661) 326-6969

- **Models.** There are a number of references to specific air quality models in the GAMAQI. These are the most current models available at the time the GAMAQI was prepared and are subject to change. The latest approved models should always be used for air quality analysis. If unsure about current models, modelers should contact the SJVAPCD CEQA staff.

- **Organization.** This document is organized to reflect the environmental review process for a Lead Agency. Because each section provides information on an

essential step in a CEQA air quality analysis process, the GAMAQI can be used as a reference resource at any step of the environmental review process.

- **Early Consultation at the Planning Counter.** One goal of the GAMAQI is to provide information to project proponents about air quality issues early in the planning process. Planners can use the information in this document and also the information provided in the SJVAPCD's *Air Quality Guidelines for General Plans* and the websites mentioned in Section 3.2 to encourage developers to consider air quality issues and minimize potential impacts before completing a project's scope or design.

- **District Support.** SJVAPCD CEQA representatives are available to answer questions about the guidance in this document and air quality-related questions at (559) 230-5800 in the Central Region office servicing Fresno and Madera Counties; (209) 557-6400 in the Northern Region office servicing Merced, Stanislaus, and San Joaquin Counties; and (661) 326-6900 in the Southern Region office servicing, Kings and Tulare Counties and the SJV portion of Kern County.

1.6 RELATIONSHIP TO NEPA

Some projects subject to CEQA may also require compliance with federal environmental law, namely the National Environmental Policy Act (NEPA). The air quality analyses prepared in accordance with the GAMAQI should be adequate in most cases to meet NEPA as well as CEQA requirements.

SECTION 2 – CONSULTING WITH THE SJVAPCD

2.1 INTRODUCTION

As noted in Section 1, the SJVAPCD can have one of three areas of responsibility under the CEQA: Lead Agency, Responsible Agency, and as a commenting agency. The SJVAPCD's specific responsibilities as a Lead Agency are addressed in a separate SJVAPCD document entitled *Environmental Review Guidelines*[8], which is available for review at any of the District's three regional offices or from the District's web site at www.valleyair.org.

This GAMAQI focuses on the SJVAPCD's expectations and responsibilities as a commenting agency. The GAMAQI also describes the special considerations required when the District is a Responsible Agency. This section addresses the general CEQA procedures that the SJVAPCD expects Lead Agencies to follow and its own responsibilities during the consultation process. This section lists occasions when the District requests to receive documents for review; however, this does not constitute a formal request since the GAMAQI is an advisory document.

2.2 LEAD AGENCY CONSULTATION REQUIREMENT

Most development projects in the San Joaquin Valley have the potential to impact air quality. Lead Agencies that should consult with the SJVAPCD thus consist of all public agencies in the SJVAB that undertake or have authority to approve discretionary projects within the boundaries of the District. These include, but are not limited to, the eight counties, 59 cities, Councils of Government, Transportation Planning Agencies, state and federal agencies, school districts, and special purpose districts such as water districts or community service districts. Any agency or other entity that is unsure of its responsibility to consult with the SJVAPCD should contact the nearest SJVAPCD regional office for information and assistance.

2.3 WHEN CONSULTATION IS REQUIRED

The SJVAPCD is available for consultation at any time in the project review process, but there are certain times when consultation is required. When the SJVAPCD has discretionary approval authority over a project for which another public agency is serving as Lead Agency, it is to be consulted as a Responsible Agency. When the SJVAPCD does not have any approval authority over a project, it is to be consulted as a commenting agency. CEQA requires or provides opportunities for consultation at various times during the environmental review process. These include opportunities for review prior to the

[8] Adopted by the Governing Board in August 2000.

preparation of the environmental document and during public review of the completed document.

2.3.1 Review Prior to Preparation of Environmental Document

CEQA provides for several opportunities for consultation prior to the preparation of an EIR or Negative Declaration. These opportunities are described below.

Prior to Determination to Proceed with a ND or an EIR. CEQA[9] provides that Lead Agencies must formally consult with Responsible Agencies prior to making a determination as to whether a Negative Declaration or an EIR is required for a project. This section also provides that a Lead Agency may informally consult with other agencies prior to formal consultation. This consultation is generally accomplished by the Lead Agency requesting information related to potential impacts and mitigation measures that the project may have upon the resource under each agency's jurisdiction. The SJVAPCD requests that it be consulted by Lead Agencies on all projects at this stage of the CEQA process[10].

Notice of Preparation. When a Lead Agency decides to prepare an EIR, it must consult with Responsible Agencies through a Notice of Preparation (NOP) of the EIR[11]. The NOP must be sent by registered mail or a similar method that can demonstrate that the required notice was mailed. When the SJVAPCD is a Responsible Agency, it must receive the NOP. Even though, for most projects the SJVAPCD is not a Responsible Agency, the SJVAPCD's NOP response can provide the Lead Agency important guidance regarding the scope of the environmental effects of their project on air quality. Therefore, the SJVAPCD requests that it receive all NOPs. If a Lead Agency is unsure as to whether the SJVAPCD is a Responsible Agency for a project, please contact the CEQA representative at the nearest SJVAPCD regional office.

Scoping Meetings. Scoping meetings to determine the scope and content of an EIR must be held if requested by a Lead Agency, a Responsible or Trustee Agency, or a project applicant. Any person or organization that will be concerned with the environmental effects of the project may be invited to a scoping meeting. The SJVAPCD requests that it be notified of all scoping meetings for EIRs for projects within its boundaries.

Early Consultation. CEQA encourages Lead Agencies to consult with any individual or agency that will be concerned with the environmental effects of the project prior to the completion of the Draft EIR or Negative Declaration. This is often done in conjunction with the NOP or scoping meetings. If the SJVAPCD is a Responsible Agency or just a commenting agency, it requests that during early consultation it be provided with an opportunity to comment on the air quality impacts of all projects within its boundaries.

[9] PRC §21080.3(a)
[10] PRC §21104 and §21153
[11] PRC §21080.4

2.3.2 Review after Completing the Environmental Document

CEQA Guidelines requires public review periods for completed proposed Negative Declarations[12] and Draft EIRs[13]. The SJVAPCD requests to be included in distribution of all completed environmental documents within its jurisdiction. CEQA Guidelines also requires that Lead Agencies respond to any comments made on Draft EIRs[14].

Review of Proposed Negative Declaration or Mitigated Negative Declaration. CEQA[15] requires that public notices to issue Negative Declarations be sent to any organization or individual that has so requested. The SJVAPCD realizes that it may not be necessary to review all Negative Declarations for projects on which it was consulted prior to their preparation. Therefore, in responding to consultation, the SJVAPCD will request copies of the Negative Declarations it wishes to review. In general, the SJVAPCD will request copies of Negative Declarations for larger projects for which it has recommended mitigation measures and for projects where the SJVAPCD did not have an opportunity to comment during early consultation.

Review and Comment on the Draft EIR. CEQA[16] also requires that public notices for draft EIRs be sent to any organization or individual that has so requested. In addition, CEQA Guidelines[17] requires Lead Agencies "consult with and request comments on" draft EIRs from both Responsible Agencies and other agencies "which exercise authority over resources which may be affected by the project." The SJVAPCD requests that all draft EIRs prepared for projects within its boundaries be sent to it for review and comment.

Response to Comments on Draft EIRs. CEQA[18] requires that a Lead Agency send a written response to the SJVAPCD on any comments it has made on a Draft EIR at least ten days prior to certifying the EIR.

2.4 DATA NEEDED FOR SJVAPCD REVIEW

2.4.1 Informal Consultation

SJVAPCD CEQA staff has been reviewing projects since the inception of the District in 1991, and in some SJV counties prior to unification. The data sent to the SJVAPCD for review prior to the preparation of an environmental document varies from one jurisdiction to another. In some cases, a copy of all information submitted by project applicants is sent. In others, only a project title or one paragraph description is sent.

[12] CCR §15073
[13] CCR §15087
[14] CCR §15088
[15] PRC §21092
[16] PRC §21092
[17] CCR §15086(a)
[18] PRC §21092.5

In order for the SJVAPCD to properly review a project for which an Initial Study has been conducted, Lead Agencies should send a complete project description and location (preferably including a map), site plans, and tentative tract or parcel maps, if applicable; and data relative to number of vehicles or trips associated with the project. At minimum, Lead Agencies should allow ten working days for the SJVAPCD to respond.

For all EIRs prepared for projects in the District, the SJVAPCD requests that it be sent the Notice of Preparation (NOP). The CEQA Guidelines[19] require that the NOP include, at minimum, a description of the project, project location, and the probable environmental effects of the project. The CEQA Guidelines[20] provides for a 30-day consultation period for NOPs.

2.4.2 Negative Declarations

The SJVAPCD needs all of the basic information required by CEQA Guidelines[21] in order to provide a thorough review. This includes a brief description of the project, including a commonly used name for the project, if any; the location of the project, preferably shown on a map; and the name of the project proponent. To help the SJVAPCD identify previously reviewed projects, this information should correspond to, or reference, the same information provided during the Initial Study consultation process. The Lead Agency should include a copy of the Initial Study that documents reasons to support the Negative Declaration. Finally, any mitigation measures included in the project to avoid potentially significant effects should be in the consultation packet.

If an air quality study is prepared for a project at the Initial Study level, it should be summarized and the results reported in the Initial Study and the entire air quality study should be provided to the SJVAPCD. All assumptions used in the modeling analysis for any project should be clearly stated.

2.4.3 Draft EIRs

The Draft EIR prepared for any project in the SJVAPCD should be sent to the appropriate SJVAPCD regional office for review and comment. Where an air quality study is prepared for a project, it should be summarized and the results reported in the Draft EIR and the entire air quality study should be included as an appendix or as a separate report. All assumptions used in the modeling analysis for any project should be clearly stated. When the Draft EIR includes air quality mitigation measures, the required mitigation monitoring and reporting should be included in or with the Draft EIR.

[19] CCR §15082
[20] CCR §15082(b)
[21] CCR §15071

2.4.4 Response to Comments

A Lead Agency's response to the SJVAPCD's comments on a Draft EIR may be in the form of the final EIR or may be a separate letter. The response should include the date, time, and location for when the Lead Agency proposes to certify the EIR.

2.5 SJVAPCD RESPONSIBILITIES FOR CONSULTATION

2.5.1 Consulting Prior to Environmental Determination

As noted in Section 1, the SJVAPCD is divided into three regions. The Northern Region consists of San Joaquin, Stanislaus, and Merced Counties. The Central Region (for the purpose of CEQA activities only) consists of Madera and Fresno Counties. The Southern Region (for the purpose of CEQA activities only) consists of Kings and Tulare Counties and the valley portion of Kern County. Addresses and telephone numbers for these offices are located in Appendix B and on the District's website (www.valleyair.org). Consultation requests should be sent to the SJVAPCD CEQA representative at the regional office that covers the county in which the project is located. If a Lead Agency is unsure of where consultation should occur, the central region office in Fresno may be contacted for additional information.

When the SJVAPCD receives a request for consultation, the following procedure will be used:

- Initially, SJVAPCD CEQA staff evaluates all requests for consultation to determine if there is a potential for significant adverse effects to air quality. Projects of concern will get further review.

- The SJVAPCD's policy is to respond to all projects of concern within the review period established by the Lead Agency. When it is unable to meet the stated deadlines, a staff member will notify the Lead Agency and request additional time or explain why the deadline cannot be met.

- For information related to the air quality setting in the SJVAB, the SJVAPCD will reference the most recent version of the Technical Document, by date.

- The SJVAPCD will indicate the appropriate Analysis Level for the project (see Section 5).

- For typical projects, the SJVAPCD will provide a description of potential impacts and mitigation measures.

- At the request of the applicant or Lead Agency, SJVAPCD staff will meet with the project proponents or Lead Agency staff to discuss the potential impacts and mitigation measures.

- For large or unusual projects, that may have a significant potential for air quality impacts, the SJVAPCD will request a meeting with the applicant or his representative to discuss the impacts and possible mitigation measures.

- The SJVAPCD will attend scoping meetings for EIRs, as far as time and work schedules permit and the projects have the potential to generate significant air quality impacts.

2.5.2 Review of Proposed Negative Declarations and Draft EIRs

The SJVAPCD will review Initial Studies/Negative Declarations and Draft EIRs for the following concerns:

- the accuracy of the air quality setting data;

- modeling assumptions, if applicable;

- whether air quality impacts are adequately described;

- the extent to which recommended mitigation measures or other mitigation measures determined by the project proponents are incorporated into the project; and

- whether the SJVAPCD agrees with the overall conclusions regarding impacts on air quality.

SECTION 3 – PRELIMINARY PROJECT REVIEW

3.1 INTRODUCTION

This section provides guidance regarding early consultation on air quality issues between project proponents and local governments. It is meant to assist Lead Agencies in addressing air quality issues at an early stage in the development review process.

3.2 LEAD AGENCY ACTIONS PRIOR TO COMMENCING CEQA

The SJVAPCD encourages local jurisdictions to address air quality issues as early as possible in the development review process. Local jurisdictions should work with applicants on issues such as potential land use conflicts (e.g., odors) and site design to encourage alternatives to the automobile and the use of clean-burning fireplaces. Addressing land use and site design issues while a proposed project is still in the conceptual stage increases opportunities to incorporate measures and desirable modifications to minimize air quality impacts. By the time a project enters the CEQA process, it is often more costly and time-consuming to redesign the project to incorporate mitigation measures. Lead Agency/applicant consultation may be achieved by including a formal step in the jurisdiction's development review procedures or simply by discussing air quality concerns at the appropriate local planning counter when a project proponent makes an initial contact regarding a proposed development. Regardless of the specific procedures a local jurisdiction employs, the objective should be to incorporate features benefiting air quality into a project before significant resources (public and private) have been devoted.

The following air quality considerations warrant particular attention during early consultation with project proponents:

1) land use and design measures to encourage alternatives to the automobile and conserve energy;

2) development design to eliminate or minimize the use of traditional wood-burning fireplaces;

3) land use conflicts and exposure of sensitive receptors to odors, toxics, and criteria pollutants; and

4) applicable SJVAPCD rules, regulations, and permit requirements.

Land Use and Design Considerations - Land use decisions are critical to air quality because land use patterns determine transportation needs, and motor vehicles are the largest single category of air pollution in the San Joaquin Valley. The location, intensity, and design of land use development projects significantly influence how people travel. For

example, land use strategies such as locating moderate or high-density development near transit nodes increase opportunities for residents/employees to use transit rather than drive their cars. Similarly, design considerations such as orienting a building entrance towards a sidewalk and/or transit stop increase the attractiveness of walking and transit as alternatives to driving. Some important land use and design strategies to consider include the following:

- Encourage the development of higher density housing and employment centers near existing and planned transit nodes.
- Encourage compact development featuring a mix of uses that locates residences near jobs and services.
- Provide neighborhood retail within or adjacent to large residential developments.
- Provide services, such as restaurants, banks, copy shops, post office, etc., within office parks and other large employment centers.
- Encourage infill of vacant and redevelopment sites.
- Ensure that the design of streets, sidewalks, and bike paths/routes within a development encourages walking and biking.
- Orient building entrances towards sidewalks and transit stops.
- Provide landscaping to reduce energy demand for cooling.
- Orient buildings to minimize energy required for heating and cooling.
- Encourage changes in zoning regulations to allow for upper story residential and/or office uses in neighborhood shopping areas.

Further information regarding land use and design strategies is provided in Section 6. Also, the SJVAPCD has prepared a guidance document on these issues entitled *Air Quality Guidelines for General Plans* (AQGGP). The AQGGP document provides guidance to local officials and staff on developing and implementing local policies and programs to improve air quality to be included in local jurisdictions' general plans.

In order to get ideas and concepts on what constitutes land use and design strategies that would be beneficial for air quality, SJVAPCD CEQA staff recommends visiting the following World Wide Web sites:

- The Center of Excellence for Sustainable Development (http://www.sustainable.doe.gov/)

- The Local Government Commission's Center for Livable Communities (http://www.lgc.org/clc/welcome.html)
- Walkable Communities, Inc. (http://www.walkable.org/)
- PLANetizen (http://www.planetizen.com/)

Lead Agency staff may also contact their appropriate SJVAPCD CEQA representative for assistance.

Development designs to eliminate or minimize the use of traditional wood-burning fireplaces – The traditional wood-burning fireplaces are assembled on site and integral to the structure of the house. They are masonry (usually brick and/or stone) in design and typically have large fixed openings (hearth) to the fire bed and have dampers above the combustion area in the chimney to limit room air and heat loss when the fireplace is not being used. These "open-hearth" fireplaces usually heat a room by radiation, with a significant fraction of the combustion heat lost in the exhaust gases and through fireplace walls. Moreover, some of the radiant heat entering the room goes toward warming the outside air that is pulled into the residence to make up for that drawn up the chimney. The net effect is that open-hearth fireplaces are usually inefficient heating devices. Indeed, in cases where combustion is poor, where the outside air is cold, or where the fire is allowed to smolder (thus drawing outside air into the residence without producing appreciable radiant heat energy), a net heat loss may occur in a residence using an open-hearth fireplace.

In addition, the inefficient combustion of an open-hearth fireplace means that significant quantities of unburned combustibles (emissions) are produced. Housing developments with many open-hearth "built-in" fireplaces could create a significant deleterious effect on the localized air quality. Conventional "older" wood stoves are almost as inefficient and polluting as the open-hearth fireplace. There are hundreds of chemical compounds in wood smoke, including many that are irritating and potentially cancer causing[22]. Fireplace/wood stove emissions also include respirable particulate matter (PM-10), carbon monoxide (CO), sulfur oxides (SOx), nitrogen oxides (NOx), and volatile organic compounds (VOC).

Breathing air containing wood smoke contributes to cardiovascular problems; lung diseases like asthma, emphysema, pneumonia, and bronchitis; irritations to the lungs, throat, sinuses, and eyes; headaches; and allergic reactions. Those with the greatest health risk from wood smoke include infants and children, pregnant women, and people with lung or heart disease[23].

[22] "Controlling Wood Smoke Pollution", Washington State Department of Ecology, October 1998 (FA-91-127, rev. 10/98)
[23] ibid.

However, fireplace and wood stove technology and products are readily available that can significantly reduce these emissions. For example, an EPA-Certified[24] wood stove emits about 40 to 60% less PM-10 and CO and over 65% less VOCs than the open-hearth fireplace. The lowest emissions are achieved using EPA-Certified "Pellet" Stoves[25] that emit 80 to 90% less PM-10 and CO than the open-hearth fireplace.

EPA-Certified wood stoves and pellet stoves can also be used in existing open-hearth fireplaces. They are essentially wood stoves designed to be installed or inserted into the fireplace firebox/hearth cavities. If properly installed, their performance is similar to that of their stove counterparts.

Over the last 10 years, the use of natural gas or liquefied petroleum gas (LPG) in place of cordwood has become widespread in fireplaces used for primary and supplemental heating purposes. Three types of gas units have the "fireplace look". They are gas fireplace inserts, decorative gas fireplaces, and gas fireplace heaters. All have negligible emissions, compared to cordwood fireplaces. Emissions are reduced nearly 100%. Gas fireplace inserts, like certified cordwood and pellet inserts, can be put into existing fireplaces.

Residential fuel combustion poses a localized health risk when trapped at ground level during winter weather conditions. According to the 1996 emissions inventory, residential fuel combustion contributed 12 tons of PM-10, 81 tons of CO, 0.3 tons of SOx, 6.7 tons of NOx, and 6.4 tons of VOCs per day in the winter.

A phone survey conducted for the District in November 1997 revealed that 31% of the San Joaquin Valley residents have one or more fireplaces or wood stoves in their home. Of those, two-thirds do not have a fireplace insert, and just under 3% burn only gas. This demonstrates that significant strides could be made in reducing the air quality and health impacts from fireplaces, while maintaining the ambience and aesthetics of a roaring fire in the fireplace.

Land Use Conflicts and Sensitive Receptors - The location of a development project is a major factor in determining whether it will result in localized air quality impacts. The potential for adverse air quality impacts increases as the distance between the source of emissions and members of the public decreases. Impacts on sensitive receptors are of particular concern. Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors.

[24] All wood heaters manufactured after July 1, 1988 and sold after July 1, 1990 had to meet Phase II certification as described in Code of Federal Regulations, Title 40, Volume 6, Part 60, Section 60.533.

[25] Pellet stoves are fueled with pellets of sawdust, wood products, and other biomass materials pressed into manageable shapes and sizes. These stoves have active air flow systems and unique grate designs to accommodate this type of fuel.

For each of the situations discussed below, the impacts generally are not limited only to sensitive receptors. *All* members of the population can be adversely affected by criteria pollutants, toxic air contaminants, odor, and dust and thus any consideration of potential air quality impacts should include all members of the population. This discussion focuses on sensitive receptors, however, because they are most vulnerable to the effects of air pollution.

Air quality problems arise when sources of air pollutants and sensitive receptors are located near one another. There are several types of land use conflicts that should be avoided:

- Development projects with sensitive receptors in close proximity to a congested intersection or roadway with high levels of emissions from motor vehicles. High concentrations of carbon monoxide, fine particulate matter, or toxic air contaminants are the most common concerns.

- Development projects with sensitive receptors close to an industrial source of toxic air contaminants.

- Development projects with sensitive receptors close to a source of odorous emissions. Although odors generally do not pose a health risk, they can be quite unpleasant and often lead to citizen complaints to the SJVAPCD and to local governments.

- Development projects with sensitive receptors close to a source of high levels of nuisance dust emissions.

Localized development-related air pollution impacts to sensitive receptors generally occur in one of two ways: 1) a (new) source of air pollutants is proposed to be located close to existing sensitive receptors, for example, an industrial facility is proposed for a site near a school; or 2) a (new) development project with sensitive receptors is proposed near an existing source of air pollutants, for example, a hospital is proposed for a site near a refinery.

Specific legislation has addressed these concerns. Two examples specifically addressed by law are:

- Section 42301.6 of the California Health and Safety Code (CH&SC) imparts certain requirements for the SJVAPCD's approval of permits for facilities that would have the potential to emit hazardous air pollutants that would be located within 1000 feet of a school, and

- Section 39003 of the Education Code and Section 21151.4 of the PRC requires Lead Agencies to not approve Negative Declarations or Environmental Impact Reports for any new school facilities which are located within ¼ mile of any potential source of hazardous air emissions unless certain requirements are met.

Preliminary consultation between project proponents and Lead Agency staff can avoid or minimize localized impacts to sensitive receptors. When evaluating whether a development proposal has the potential to result in localized impacts, Lead Agency staff need to consider the nature of the air pollutant emissions, the proximity between the emitting facility and sensitive receptors, the direction of prevailing winds, and local topography. Often, providing an adequate distance, or buffer zone, between the source of emissions and the receptor(s) will mitigate the problem in many cases. This underscores the importance of addressing these potential land use conflicts as early as possible in the development review process.

SECTION 4 – THRESHOLDS OF SIGNIFICANCE

4.1 INTRODUCTION

This section provides SJVAPCD recommended thresholds for determining whether projects have significant adverse air quality impacts as defined by CEQA. Projects demonstrated to have significant adverse impacts are required to mitigate impacts to levels considered less than significant or to prepare an EIR. The thresholds are advisory, but may be adopted administratively or formally by a governing body as recommended by the Governor's Office of Planning and Research (OPR) document *Thresholds of Significance: Criteria for Determining Environmental Significance*. The following gives the basis for the thresholds for all different types of air quality impacts.

4.2 BASIS FOR THRESHOLDS OF SIGNIFICANCE

The SJVAPCD used the OPR definitions of significant environmental effect as a basis to establish air quality Thresholds of Significance for the San Joaquin Valley. Section 15382 of the CEQA Guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including ... air."

The Air Quality Section of Appendix G of the CEQA Guidelines (Environmental Checklist Form) contains a list of effects that may be deemed potentially significant. These are:

a) Conflict with or obstruct implementation of the applicable air quality plan;

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project is non-attainment under applicable federal or state ambient air quality standards (including releasing emissions which exceed quantitative thresholds for ozone precursors);

d) Expose sensitive receptors to substantial pollutant concentrations; or

e) Create objectionable odors affecting a substantial number of people.

For some types of impacts, the criteria listed above are straight forward, but in other cases, they require interpretation. A violation of air quality standards can be predicted for pollutants that can be modeled for atmospheric concentration. This is the case for carbon monoxide for which violations can be predicted using a dispersion model. Ozone, however, is the product of a photochemical reaction that may occur many miles away from the

source of emissions. Although atmospheric ozone models exist, they are only sensitive enough to register changes caused by the largest projects. What is more important for determining ozone impacts is a project's contribution to existing violations of the ozone standard in the SJV. By comparing a project's ozone precursor emissions with emission levels considered important under state law, this impact can be evaluated. One such level is the stationary source emissions offset threshold required by the CCAA. Additionally, the most common measure of significance for toxic air contaminants is an increase in cancer risk based on exposure levels for the nearest sensitive receptor, while odor impacts can be judged significant based on the number of complaints expected for each type of odor producing process. These criteria are described in greater detail below.

While CEQA Guidelines[26] state that an ironclad definition of a significant effect is not possible because the significance of an effect may vary with the setting, the SJVAPCD has determined that the setting, as referred to in CEQA, can be defined for air quality. Under California state law[27], the SJVAB is defined as a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health. As such, the SJVAPCD resolves that significance thresholds established herein are based on scientific and factual data. Therefore, the SJVAPCD recommends that these thresholds be used by Lead Agencies in making a determination of significance. However, it is still recognized that the final determination of whether or not a project has a significant effect is ultimately within the purview of the Lead Agency pursuant to CEQA Guidelines[28].

Basis for Ozone Precursor Thresholds. The entire SJVAB often violates state and federal ozone ambient air quality standards. Therefore, emissions related to an individual project, if substantial, will contribute to the existing violations of the ozone standards. The SJVAPCD defines "substantial contribution" for ozone precursor emissions in terms of CCAA requirements[29]. The SJVAPCD's New and Modified Stationary Source Review Rule - Offset Requirements for nitrogen oxides (NOx) and volatile organic compounds (VOCs) (in this document, equivalent to reactive organic gases [ROG])[30] reflects the CCAA requirements. Rule 2201 sets emissions thresholds above which stationary pollution sources must offset all emissions down to the thresholds. The offset thresholds vary depending on the severity of the pollution problem in each air basin and the type of pollutant. Areas categorized as severe ozone nonattainment areas such as the SJVAB have lower thresholds than areas categorized as having only a moderate ozone problem. The SJVAPCD staff also researched and evaluated many significance thresholds established by other air quality management agencies in California and found that most agencies use the same approach. Although it may be argued that any increase in pollutant emissions in an area with a severe pollution problem may be significant, a reasonable threshold is still

[26] CCR §15064(b)
[27] California Health and Safety Codes (CH&SC) §41100
[28] CCR §15064 (c)
[29] CH&SC §40920
[30] SJVAPCD Rule 2201, §4.2.3

needed to avoid unnecessarily burdening every project with a requirement to prepare an EIR, which is clearly not intended by CEQA nor desired by the SJVAPCD.

CEQA requires that in evaluating the significance of a project's potential air quality impacts, the Lead Agency shall consider both primary (direct) and secondary (indirect) consequences[31]. Primary impacts include emissions from project construction and emissions from motor vehicles traveling to and from the facility once it is operational. An example of a secondary impact would be the emissions associated with growth that may be facilitated by the expansion of a wastewater treatment plant.

Basis for PM-10 Thresholds. The entire SJVAB is a serious nonattainment area for PM-10 and any addition to the current PM-10 problem could be considered significant. However, the SJVAPCD has established regulations governing various activities that contribute to the overall PM-10 problem. The SJVAPCD has adopted a set of PM-10 Fugitive Dust Rules collectively called Regulation VIII. Several components of Regulation VIII specifically address fugitive dust generated by construction related activities. Therefore, the SJVAPCD has determined that any determination of significance with respect to construction emissions should be based on a consideration of the control measures to be implemented. From the perspective of the SJVAPCD, compliance with Regulation VIII for all sites and implementation of all other control measures indicated in Tables 6-2 and 6-3 (as appropriate, depending on the size and location of the project site) will constitute sufficient mitigation to reduce PM-10 impacts to a level considered less-than-significant.

4.3 THRESHOLDS OF SIGNIFICANCE

This section describes and establishes the SJVAPCD's Thresholds of Significance. These thresholds are recommended for use by Lead Agencies when preparing Initial Studies. If, during the preparation of the Initial Study, the Lead Agency finds that any of the following thresholds may be exceeded and cannot be mitigated, then a determination of significant air quality impact must be made and an EIR is required.

The SJVAPCD identifies thresholds that separate a project's short-term emissions from its long-term emissions. The short-term emissions are mainly related to the construction phase of a project and are recognized to be short in duration. The long-term emissions are mainly related to the activities that will occur indefinitely as a result of project operations. In addition, CEQA[32] states that another condition that could establish a project as having a significant effect on the environment is effects that are considered "cumulatively considerable." Thresholds for project construction impacts, project operations, and cumulative impacts are discussed below.

[31] CCR §15064 (d)
[32] PRC §21083(b)

4.3.1 Threshold of Significance for Project Construction Impacts

Pollutants of Concern. A project's construction phase produces many types of emissions, but PM-10 is the pollutant of greatest concern.[33] PM-10 emissions can result from a variety of construction activities, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle exhaust. Construction-related emissions can cause substantial increases in localized concentrations of PM-10, as well as affecting PM-10 compliance with ambient air quality standards on a regional basis. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. Asbestos can also be of concern during demolition activity associated with construction. The use of diesel powered construction equipment produces ozone precursor emissions and combustion related particulate emissions. Large construction projects lasting many months may exceed the District's annual threshold for NOx emissions and could expose area residents to diesel particulate. Contact the SJVAPCD for analysis recommendations for large construction projects.

Qualitative Approach. The SJVAPCD's approach to CEQA analyses of construction PM-10 impacts is to require implementation of effective and comprehensive control measures rather than to require detailed quantification of emissions (although a Lead Agency may elect to do so - see Section 5 of this document for guidance). PM-10 emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors, making quantification difficult. Despite this variability in emissions, experience has shown that there are a number of feasible control measures that can be reasonably implemented to significantly reduce PM-10 emissions from construction. The SJVAPCD has determined that compliance with Regulation VIII for all sites and implementation of all other control measures indicated in Tables 6-2 and 6-3 (as appropriate, depending on the size and location of the project site) will constitute sufficient mitigation to reduce PM-10 impacts to a level considered less-than-significant.

Common Measures. All control measures listed in Table 6-2 (Regulation VIII Control Measures) are required for all construction sites by regulation. Table 6-3 lists additional measures that may be required due to sheer project size or proximity of the project to sensitive receptors. If all appropriate "enhanced control measures" in Table 6-3 will not be implemented for these very large or sensitive projects, then construction impacts would be considered significant (unless the Lead Agency provides a satisfactory detailed explanation as to why a specific measure is unnecessary). Table 6-3 also lists additional control measures (Optional Measures) that may be implemented if further emission reductions are deemed necessary by the Lead Agency.

[33] The SJVAPCD recognizes that construction equipment also emits carbon monoxide and ozone precursor emissions. However, the SJVAPCD has determined that these emissions may cause a significant air quality impact only in the cases of very large or very intense construction projects. The SJVAPCD will advise Lead Agencies on quantification procedures and significance on a case by case basis.

Demolition Asbestos Impacts. Project construction sometimes requires the demolition of existing buildings at the project site. Buildings often include materials containing asbestos. Airborne asbestos fibers pose a serious health threat if adequate control techniques are not carried out when the material is disturbed. The demolition, renovation, or removal of asbestos-containing materials is subject to the limitations of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations as listed in the Code of Federal Regulations[34] requiring notification and inspection. Most demolitions and many renovations are subject to an asbestos inspection prior to start of activity. The SJVAPCD's Compliance Division in the appropriate region should be consulted prior to commencing any demolition or renovation of any building to determine inspection and compliance requirements. Strict compliance with existing asbestos regulations will normally prevent asbestos from being considered a significant adverse impact.

4.3.2 Thresholds of Significance for Impacts from Project Operations

The term "project operations" refers to the full range of activities that can or may generate pollutant emissions when the development is functioning in its intended use. For projects such as office parks, shopping centers, residential subdivisions, and other indirect sources, motor vehicles traveling to and from the projects represent the primary source of air pollutant emissions. For industrial projects and some commercial projects, equipment operation and manufacturing processes can be of greatest concern from an emissions standpoint. Significance thresholds discussed below address the impacts of these emission sources on local and regional air quality. Thresholds are also provided for other potential impacts related to project operations, such as odors and toxic air contaminants.

(Lead Agencies may refer to Section 5, for guidance on calculating emissions and determining whether significance thresholds for project operations may be exceeded, and thus whether more detailed air quality analysis may be needed.)

Ozone Precursor Emissions Threshold. Ozone precursor emissions from project operations should be compared to the thresholds provided in Table 4-1. Projects that emit ozone precursor air pollutants in excess of the levels in Table 4-1 will be considered to have a significant air quality impact.

Both direct and indirect emissions should be included when determining whether the project exceeds these thresholds. The following total emissions thresholds for air quality have been established by the SJVAPCD for project operations. Projects in the SJVAB with operation-related emissions that exceed these emission thresholds will be considered to have significant air quality impacts.

[34] 40CFR Part 61, Subpart M

Table 4-1
Ozone Precursor Emissions Thresholds
For Project Operations

Pollutant	Tons/yr.
ROG	10
NOx	10

Local Carbon Monoxide Concentrations Threshold. Estimated CO concentrations, as determined by an appropriate model, exceeding the California Ambient Air Quality Standard (CAAQS) of 9 parts per million (ppm) averaged over 8 hours and 20 ppm for 1 hour will be considered a significant impact.

Odor Impacts Threshold. While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the SJVAPCD. Any project with the potential to frequently expose members of the public to objectionable odors will be deemed to have a significant impact. Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, schools, etc., warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas. Analysis of potential odor impacts should be conducted for the following two situations:

- **Generators** – projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate, *and*

- **Receivers** – residential or other sensitive receptor projects or other projects built for the intent of attracting people locating near existing odor sources.

The SJVAPCD has determined some common types of facilities that have been known to produce odors in the SJV. These are presented in Table 4-2 along with a reasonable distance from the source where the degree of odors could possibly be significant.

A Lead Agency should use Table 4-2 to determine whether the proposed project, either as a generator or a receiver, would result in sensitive receptors being within the distances indicated in Table 4-2. In addition, recognizing that this list of facilities is not meant to be all-inclusive, the Lead Agency should evaluate facilities not included in the table or projects separated by greater distances than indicated in Table 4-2 if warranted by local conditions or special circumstances. If the proposed project would result in sensitive receptors being located closer than the screening level distances indicated in Table 4-2, a more detailed analysis, as described in Section 5, should be conducted.

Table 4-2
Project Screening Trigger Levels
For Potential Odor Sources

Type of Facility	Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g. auto body shops)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile

Because offensive odors rarely cause any physical harm and no requirements for their control are included in state or federal air quality regulations, the SJVAPCD has no rules or standards related to odor emissions, other than its nuisance rule[35]. Any actions related to odors are based on citizen complaints to local governments and the SJVAPCD. Lead Agencies can make a determination of significance based on a review of District complaint records as described in Section 5. For a project locating near an existing source of odors, the impact is potentially significant when the project site is at least as close as any other site that has already experienced significant odor problems related to the odor source. Significant odor problems are defined as:

- more than one confirmed complaint per year averaged over a three year period, or
- three unconfirmed complaints per year averaged over a three-year period.

For projects locating near a source of odors where there is currently no nearby development *and* for odor sources locating near existing receptors, the determination of significance should be based on the distance and frequency at which odor complaints from the public have occurred in the vicinity of a similar facility.

If a proposed project is determined to be a potentially significant odor source, mitigation measures should be required. For some projects, operational changes, add-on controls, or process changes, such as carbon absorption, incineration, or relocation of stacks/vents can reduce odorous emissions. In many cases, however, the most effective mitigation strategy

[35] Rule 4102 of the SJVAPCD's Rules and Regulations and the California Health and Safety Codes Section 41700.

is to provide a sufficient distance, or buffer zone, between the source and the receptor(s). Recent experience has shown that locating upwind from an odor source does not necessarily eliminate potential problems. Even places with reliable prevailing winds experience days with light and variable winds and days with winds opposite prevailing winds related to the passage of storms. Residents in these upwind areas while exposed less frequently may be more sensitive to the odors.

Hazardous Air Pollutants (HAPs). Any project with the potential to expose sensitive receptors (including residential areas) or the general public to substantial levels of toxic air contaminants would be deemed to have a potentially significant impact. This applies to receptors locating near existing sources of toxic air contaminants, as well as sources of toxic air contaminants locating near existing receptors.

Particular attention should be placed on either the location of a facility that has the potential to emit hazardous air pollutants near an existing school or the location of a new school site near facilities that have the potential to emit HAPs. Both scenarios have specific regulations that govern agency actions, as discussed in Section 3.

Proposed development projects that have the potential to expose the public to toxic air contaminants in excess of the following thresholds in Table 4-3 would be considered to have a significant air quality impact. These thresholds are based on the SJVAPCD's Risk Management Policy.

Table 4-3
Thresholds of Significance for Toxic Air Contaminants

- Probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds 10 in one million.
- Ground-level concentrations of non-carcinogenic toxic air contaminants would result in a Hazard Index greater than 1 for the MEI.

There are currently more than 900 substances classified as hazardous air pollutants by the ARB and USEPA. All projects requiring air quality permits from the SJVAPCD are evaluated for HAP emissions. Examples of projects requiring permits are provided in Figure 1-2. All such projects should be referred to the SJVAPCD as part of the CEQA review process.

Accidental Releases/Acutely Hazardous Air Emissions. The determination of significance for potential impacts from accidental releases of acutely hazardous air pollutants should be made in consultation with the local administering agency of the Risk Management Prevention Program. The county health department, Office of Emergency Services, or local fire department is usually the administering agency.

Cumulative Impacts. Any proposed project that would individually have a significant air quality impact (see Section 4.3.2 – Thresholds of Significance for Impacts from Project Operations) would also be considered to have a significant cumulative air quality impact. Impacts of local pollutants (CO, HAPs) are cumulatively significant when modeling shows that the combined emissions from the project and other existing and planned projects will exceed air quality standards. See also Section 5.9.

SECTION 5 – ASSESSING AIR QUALITY IMPACTS

5.1 INTRODUCTION

Section 4 presented the thresholds that the SJVAPCD has determined will have significant effects on air quality if exceeded. This section provides guidance on quantifying and evaluating whether a proposed project or plan[36] will exceed the thresholds. It also describes the level of detail necessary for air quality analyses with various types of projects and CEQA documents. Lead Agencies have wide latitude in the level of detail that they use to analyze and describe air quality impacts. The level of analysis presented in this document represents what the SJVAPCD has determined is both reasonable and defensible. A flowchart showing the air quality analysis process for potentially significant pollutants in the SJV except for PM-10 is provided in Figure 5-1.

CEQA Streamlining. The SJVAPCD encourages Lead Agencies to take advantage of streamlining opportunities offered by CEQA in assessing air quality impacts. The use of master EIRs, tiered EIRs, subsequent EIRs/Negative Declarations, etc. allows Lead Agencies to focus on the regional and general air quality impacts early in the process and allows them to address project specific impacts later in the process when project details are known.

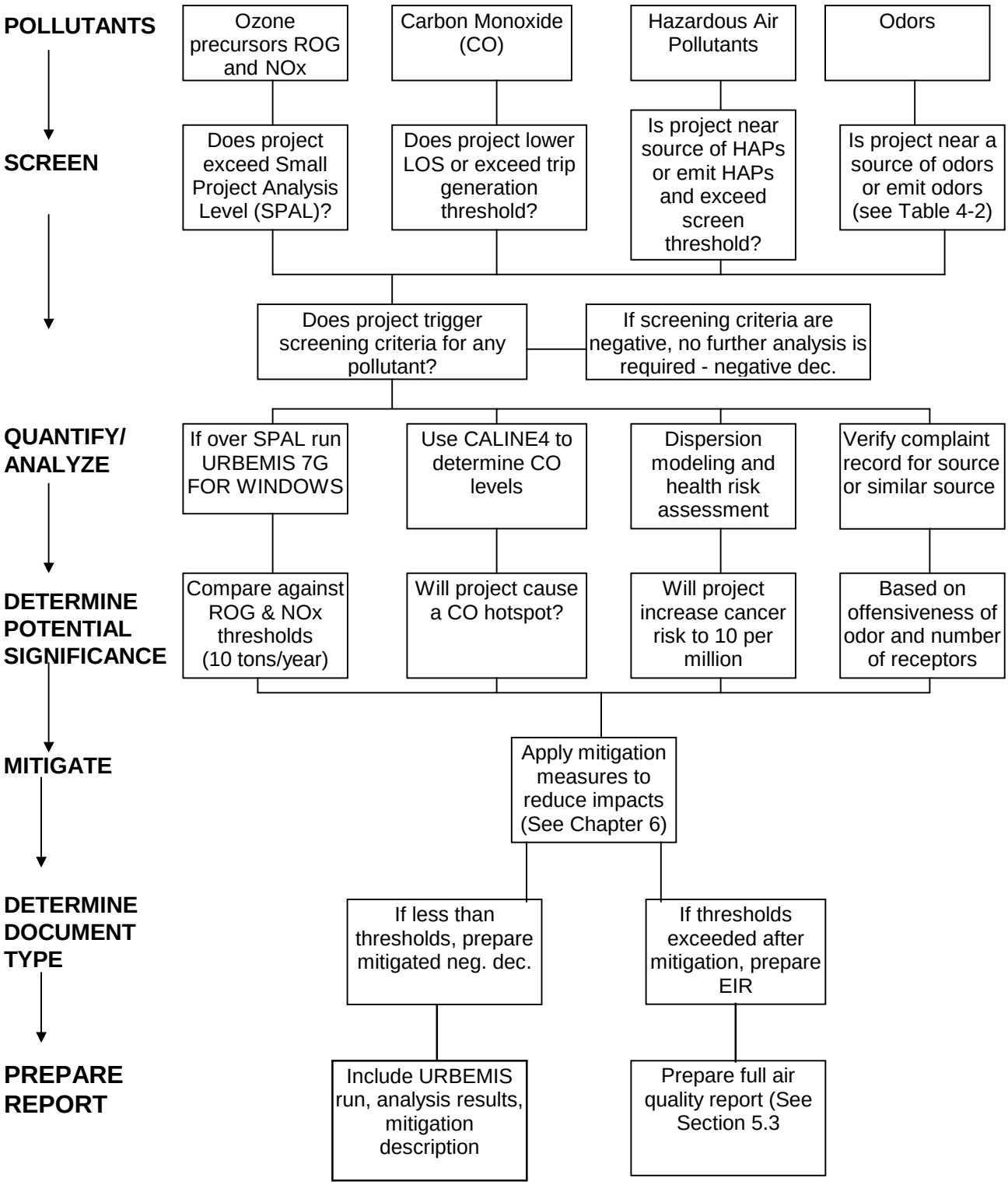
Analysis Levels by Project Size. This section describes a system devised by the SJVAPCD to identify the level of analysis appropriate for a project based on the size and type of the project. The SJVAPCD has pre-determined the size below which many commonly encountered projects will not exceed significance thresholds and still provide an adequate margin to account for site specific differences. Analyses for projects below this level will not need to quantify their emissions. Analyses for projects above the level need a cursory level of emissions quantification to determine if a project will or will not exceed significance thresholds. For projects obviously exceeding the thresholds, Lead Agencies need to prepare a full analysis appropriate for use in an EIR.

Components of a Full Air Quality Assessment. Guidance for completing the various components of a full air quality impact assessment is provided later in this section. The following information and procedures are described:

- Information that should be included on the project's environmental and regulatory setting;
- How to evaluate emissions from project construction;

[36] This section discusses how to evaluate the air quality impacts of development projects and plans. For the sake of brevity, this section generally refers only to "project(s)".

Figure 5-1
Air Quality Analysis Flow Chart
Operational Emissions



- Methods for calculating emissions from project operations, including:
  - mobile source (or "indirect") emissions;
  - localized carbon monoxide concentrations;
  - stationary source emissions; and
  - odor impacts.

- How to assess toxic air contaminants.

Analysis Methods for Special Projects. This section also describes analysis methods recommended for environmental documents for general plan updates, specific plans, and some general plan amendments. Unusual projects, and those not previously described, require consultation with the SJVAPCD to determine an appropriate analysis.

Projects Exempt from Environmental Review. Projects exempt from CEQA and projects proposing to adopt a previous environmental document should still be screened to determine if there are any significant impacts that have not been addressed. No discretionary project is exempt if new significant impacts are identified. In some cases, site specific impacts from odors, toxics, and carbon monoxide may only be identified when the precise use is proposed. Lead Agencies should review the screening criteria listed in this section when assessing the adequacy of previous environmental documents or determining the appropriateness of exempting a project.

Quantifying Project Emissions. Quantification is crucial for determining the air quality impacts of most pollutants. The basic method for calculating project emissions is to apply specific emission factors to sources of air pollutants whose magnitude and characteristics are either known or can be estimated. Emission factors may be defined as standardized relationships between particular sources of air pollution, such as motor vehicles or pieces of industrial equipment, and their air pollutant emissions. For example, emission factors for motor vehicles generally specify the amount (in grams) of certain air pollutants emitted, per mile traveled. This section references emission factors and quantification procedures for construction activities, motor vehicles, and stationary sources. Quantification of mobile sources impact is complex and would be difficult for agencies, applicants, and consultants to successfully calculate manually. For this reason, the District recommends the use of URBEMIS 7G for Windows[37] to quantify most project emissions.

This section also describes methods for evaluating air quality impacts that are not easily quantified, such as impacts associated with objectionable odors.

Once the impacts of a proposed project have been identified, the Lead Agency must determine whether or not the project would have a significant adverse impact on the

[37] URBEMIS 7G for Windows is the latest iteration of URBEMIS modeling program that is used to estimate emissions from motor vehicles associated with development projects. Version 7G for Windows also estimates emissions from area sources and includes estimated emissions reductions attributable to mitigation measures (listed in Tables 6-5 and 6-6).

environment. Significance criteria discussed in Section 4 of this GAMAQI should be used in making this determination. For any potentially significant impacts, mitigation measures must be incorporated into the project to reduce the impact(s), in so far as possible, to a level of less than significant. Section 6 provides guidance on selecting mitigation measures.

5.2 ANALYSIS OF PROJECTS REQUIRING SJVAPCD PERMITS

CEQA Guidelines[38] states a preference for the jurisdiction with the broadest authority to accomplish CEQA review when more than one public agency will be approving discretionary permits for a project. Frequently, projects requiring SJVAPCD permits must first obtain a land use approval from a city or county. In those cases, the SJVAPCD is a Responsible Agency and the city or county is the Lead Agency. If no other agencies have discretionary actions regarding the project, the District will take Lead Agency role. District processes as Lead Agency are detailed in the District's *Environmental Review Guidelines*.

CEQA also requires that the project description include a list of agencies that are expected to use the EIR in their decision-making, and a list of the approvals for which the EIR will be used[39]. If the project will require a permit from the SJVAPCD, this should be cited in the project description section of the EIR.

Many industrial projects and some commercial projects require SJVAPCD permits. (See Figure 1-2 for examples of projects requiring permits.) Lead Agencies must examine all reasonably foreseeable air quality impacts of these projects in their environmental documents. The analysis must address direct emissions from the permitted equipment or processes used at the site as well as any indirect emissions caused by motor vehicle trips, unpermitted stationary sources, or area sources related to the project. Generally, new permitted sources (emission units) emitting more than two pounds per day of NOx, and VOC must provide best available control technology, and all sources emitting more than the New Source Review Offset Thresholds must offset all emissions in excess of the thresholds. These sources thus cannot exceed the numeric thresholds of significance for ozone precursors.[40] Therefore, review of these projects should concentrate on their potential to generate local impacts such as hazardous air pollutants, odors, and pollutant hot spots. For more information on this topic, contact the SJVAPCD Small Business Assistance center in each region (see Appendix B).

Projects Exempt from SJVAPCD Permits. Stationary sources[41] that are exempt from SJVAPCD permit requirements because they fall below emission thresholds for permitting will normally not be considered to have a significant air quality impact from their permitted stationary equipment. However, the Lead Agency can, and should, make an

[38] CCR §15051(b)(1)
[39] CCR §15124(d)
[40] CCR §15064(i)
[41] Stationary sources are defined in SJVAPCD Rule 2201 as any building, structure, facility, or installation which emits, or may emit any affected pollutant directly or as a fugitive emission.

exception to this determination if special circumstances suggest that the emissions from any permitted or exempt source may cause a significant air quality impact. For example, if a source may emit objectionable odors, then odor impacts on nearby receptors should be considered a potentially significant air quality impact.

SJVAPCD assuming Lead Agency role. CEQA, generally, requires Responsible Agencies to use the environmental document prepared by the Lead Agency. However, CEQA Guidelines[42] list three occasions when a Responsible Agency must assume the Lead Agency role:

(1) The Lead Agency did not prepare any environmental documents for the project and the statute of limitations for challenging the project has elapsed;
(2) When a subsequent EIR is required and the Lead Agency has granted final approval of the project, and the statute of limitations has expired;
(3) The Lead Agency's environmental document is inadequate, and the Responsible Agency was not consulted, and the statute of limitations has expired.

In addition, there are occasions in which discretionary projects requiring SJVAPCD permit approval do not require discretionary approval from any other public agency. In these cases, the SJVAPCD would take on the duties of Lead Agency.

5.3 QUANTITATIVE EMISSIONS ANALYSIS LEVEL

This section describes the level of quantitative emissions analysis recommended for various sizes and types of land use projects. The SJVAPCD has established a three-tiered approach to determining significance related to a project's quantified ozone precursor emissions. Each tier or level requires a different degree of complexity of emissions calculation and modeling to determine air quality significance as described below. Table 5-1 summarizes the requirements for each level of analysis. Each level also requires the project to be analyzed for toxic air contaminants, hazardous materials, and odors. The potential for asbestos emissions must also be considered. For asbestos, size or complexity of the project does not matter. Any project that includes demolition or renovation of existing buildings needs to contact the SJVAPCD's Asbestos Coordinators at the appropriate SJVAPCD regional office.

Small Project Analysis Level (SPAL). The SJVAPCD pre-calculated the emissions on a large number and types of projects to identify the level at which they have no possibility of exceeding the emissions thresholds listed in Table 4-1. Table 5-2 provides this information in terms of vehicle trips required to exceed the SPAL threshold for five general land use categories[43]. Table 5-3 lists sizes of various specific development types meeting these criteria. Projects falling under these size thresholds qualify for what the SJVAPCD refers to as the Small Project Analysis Level (SPAL). No quantification of ozone precursor

[42] CCR §15052(a)
[43] Land use category descriptions are provided in the Institute of Transportation Engineers (ITE) Trip Generation report and in the URBEMIS 7G for Windows User's Guide.

emissions is needed for projects less than or equal to the sizes listed, however, other factors, such as toxic air contaminants, hazardous materials, asbestos, and odors still need to be analyzed. The SJVAPCD still wishes to review SPAL projects. Initial studies should note that the project is a SPAL project and provide a brief justification for the finding of no significant air quality impacts. For a multi-use project, if its combined trip generation rate exceeds the lowest applicable trip threshold from Table 5-2, an air quality analysis as described for the Cursory Analysis Level (CAL) should be prepared.

Note that even if a project is on the SPAL list, it does not relieve the Lead Agency from assessing a project for other potential significant air quality impacts. Some industrial and commercial projects may have impacts related to toxic air contaminants, hazardous materials, or odors. Projects containing sensitive receptors such as residential subdivisions, schools, hospitals, and so on must be assessed for exposure to pollutants from existing or planned industrial and commercial development. Any project that includes demolition or renovation of existing buildings needs to contact the SJVAPCD's Asbestos Coordinators at the appropriate SJVAPCD regional office.

When a project falls under the SPAL, the Lead Agency should use the information in the initial study checklist, or whatever format used, to justify a finding of less than significant air quality impacts. The initial study should also verify that no sensitive receptors would be exposed to substantial pollutant concentrations as a result of the project.

Table 5-1
Project Analysis Requirements

Analysis Level	Analysis Requirements
Small Project Analysis Level (SPAL)	• Verify project qualifies as a SPAL project (Table 5-2, 5-3). • Examine area surrounding project site for sources of toxic air contaminants, hazardous materials, and odors. • If industrial or commercial; verify that project is not a source of toxic air contaminants, hazardous materials, and odors. • Mitigate cumulative impacts with measures appropriate for the site. • If demolition or renovation of existing buildings, contact the District for asbestos requirements.
Cursory Analysis Level (CAL)	• Conduct URBEMIS 7G for Windows[44] model run. • Screen project for CO impact[45]; run CALINE4[46] if required. • Perform screening analysis of potential toxics, hazardous materials, and odor impacts if near a potential source or if project is a potential source of these pollutants. • If demolition or renovation of existing buildings, contact the District for asbestos requirements. • Identify mitigation measures and quantify with URBEMIS 7G for Windows when feasible. • If project is identified as potentially significant using the above screening methods, prepare full analysis.
Full Analysis Level (FAL)	• Conduct URBEMIS 7G for Windows model run for projects. • Conduct Direct Travel Impact Model (DTIM)[47] model run for large plans when a transportation model is available. • Screen project for CO impact/run CALINE4 if required • Perform screening analysis for potential toxics, hazardous materials, and odors. • If project is identified as a potentially significant source of toxic or hazardous pollutants, prepare a health risk assessment.

[44] URBEMIS for Windows is available on ARB's website (http://www.arb.ca.gov/urbemis7/urbemis7.htm)

[45] The SJVAPCD recommends using the Transportation Project-Level Carbon Monoxide Protocol (CO Protocol) developed by UC Davis in December 1997. The program deals with project-level air quality analysis needed for federal conformity determinations, NEPA, and CEQA. The CO Protocol is available on Caltrans' website (http://www.dot.ca.gov/hq/env/air/extsoft.htm).

[46] CALINE4 (CAlifornia LINE Source Dispersion Model), is the standard modeling program used by Caltrans to assess air quality impacts near transportation facilities, in the rare cases when the screening procedures of the CO Protocol fail. It is based on the Gaussian diffusion equation and employs a mixing zone concept to characterize pollutant dispersion over the roadway. The SJVAPCD recommends the use of CL4 (Version 1.31). CL4 is a user interface designed to work with the CO Protocol, and can only be used for CO analysis. The program requires Windows 95/NT or higher and is available on Caltrans' website (http://www.dot.ca.gov/hq/env/air/extsoft.htm).

	• Prepare an air quality report containing: ▪ existing air quality conditions; ▪ analysis of project air quality impacts; mitigation measures; and ▪ results of modeling as technical appendices.

Table 5-2
Small Project Analysis Level (SPAL) in Vehicle Trips

Land Use Category	Project Size[48]
Residential Housing	1,453 trips/day
Commercial	1,673 trips/day
Office	1,628 trips/day
Institutional	1,707 trips/day
Industrial	1,506 trips/day

Table 5-3 (a)
Small Project Analysis Level (SPAL) by Project Type

Land Use Category	Project Size
Housing	
Single Family	152 Units
Apartments, Low Rise	220 Units
Apartments, High Rise	345 Units
Condominiums, General	270 Units
Condominiums, High Rise	335 Units
Mobile Homes	330 Units
Retirement Community	460 Units

[47] The Direct Travel Impact Model (DTIM) was developed by Caltrans in the late 1970's and is used in the State of California to calculate amounts of air pollutant emitted from motor vehicles and fuel consumption. The DTIM analysis is based on travel data produced by the Regional Transportation Model and on emission factors from the EMFAC Model. Some jurisdictions use the mobile emission inventory model MVEI7G when DTIM is not available. MVEI7G is available from the California Air Resources Board at www.arb.ca.gov/msei/mvei/mvei.htm.

[48] The project size numbers, and the trip generation numbers in Tables 5-2 and 5-3 were generated with URBEMIS 7G for Windows using default settings and are based on 90 percent of the ozone precursor emission thresholds. For definitions of land use categories listed above, see the URBEMIS 7G for Windows User's Guide or the latest edition of the Institute of Transportation Engineers, Trip Generation Manual.

Table 5-3 (b)
Small Project Analysis Level (SPAL) by Project Type

Land Use Category	Project Size
Office	
General Office Building	110,000 ft^2
Office Park	106,000 ft^2
Government (Civic Center)	57,000 ft^2
Government Office Building	23,000 ft^2
Medical Office Building	52,000 ft^2

Table 5-3 (c)
Small Project Analysis Level (SPAL) by Project Type

Land Use Category	Project Size
Retail	
Free Standing Discount Store	61,000 ft^2
Regional Shopping Center<57,000	11,000 ft^2
Discount Club Store	40,000 ft^2
Supermarket	9,000 ft^2
Convenience Market (w/o gas pumps)	2,000 ft^2
Convenience Market (w/ gas pumps)	2,000 ft^2
Gasoline/Service Station	10 pumps
Quality Restaurant	20,000 ft^2
Restaurant (high turnover sit-down)	9,000 ft^2
Fast Food Restaurant	2,000 ft^2
Day Care Center	22,000 ft^2
Bank (w/ drive-through)	10,000 ft^2
Racquet/Health Club	44,000 ft^2
Hotel	200 Units
Motel	170 Units

Table 5-3 (d)
Small Project Analysis Level (SPAL) by Project Type

Land Use Category	Project Size
Industrial [49]	
General Light Industry	510,000 ft^2
Heavy Industry	920,000 ft^2
Industrial Park	370,000 ft^2
Manufacturing	400,000 ft^2

Table 5-3 (e)
Small Project Analysis Level (SPAL) by Project Type

Land Use Category	Project Size
Institutional	
Hospital	78,000 ft^2
Elementary School	1875 students
Junior High School	1680 students
High School	1325 students
Junior College (2 year)	1100 students
University/College (4 year)	716 students
Place of Worship	48,000 ft^2

Cursory Analysis Level (CAL). Projects above the SPAL and most multi-use projects require a cursory air quality analysis to determine if they will exceed air quality significance thresholds after mitigation. A cursory analysis includes emission quantification, preliminary CO screening, and qualitative analysis of potential construction, toxics, and odor impacts. The SJVAPCD recommends using the URBEMIS 7G for Windows program to calculate project area source and mobile source emissions and for identifying mitigation measures to reduce impacts.

If a project has over a five year projected build-out, analyses should be done for the final build-out year (using the nearest default year in URBEMIS) and one intermediate year (using the URBEMIS default year nearest to the midpoint of projected build-out of the project). URBEMIS 7G for Windows provides the following default years: 2000, 2001, 2002, 2003, 2004, 2005, 2010, 2015, and 2020. If projected emissions exceed thresholds for any analysis year, the impact is considered to be significant and a full analysis is required.

[49] The SPAL levels for industrial sources are based only on indirect source emissions. Emissions from SJVAPCD regulated stationary sources are not included.

If there is a possibility that the project will result in a substantial increase in traffic congestion, it should be screened for potential CO hot spots using the CO Protocol[50] described in section 5.6.3 of this document. The area around the project site should be examined for the presence of potential toxic pollution sources and odor sources. When analyzing industrial projects, the impacts of potential toxic emissions and odors on any sensitive receptors near the project site must be identified. Applicants for any project that includes demolition or renovation of existing buildings need to contact the SJVAPCD's Asbestos Coordinators at the appropriate SJVAPCD regional office.

The SJVAPCD recommends that the results of the cursory analysis be presented in an air quality report that would be included in the environmental documentation supporting the negative declaration. The air quality report should include a brief air quality setting, the emissions analysis results, results of other air analyses, and a description of mitigation measures used to reduce the project's emissions. Provide either full documentation of calculations with justification of mitigation measures used when using manual method of quantification or an URBEMIS 7G for Windows detailed printout with descriptions of any modifications to URBEMIS 7G for Windows defaults (with justification for reduction amount).

Full Analysis Level (FAL). If the cursory analysis demonstrates that projected emissions from a project will be greater than the SJVAPCD's thresholds after mitigation or the project is of such magnitude that the ozone precursor thresholds would be obviously exceeded, a full analysis should be prepared. A full analysis will consist of the information applicable to the cursory analysis plus a thorough discussion of the air quality impacts and air quality environmental setting, as described in Section 5.4 of this document. Projects found to exceed CO screening thresholds may also require CO hotspot analysis using the CALINE4 dispersion model[51]. Projects containing toxic emission sources and those projects potentially exposed to toxic emissions may require a toxics risk assessment. Risk assessments require dispersion modeling to determine cancer risk for the nearest exposed individual. Procedures for addressing toxic air contaminants and hazardous air pollutants are found later in this section.

5.4 ENVIRONMENTAL SETTING

One purpose of CEQA is to publicly disclose all environmental effects of a project, so the public is informed, and decision-makers make decisions based on a thorough understanding of a project's impacts. Information such as environmental setting, existing air quality conditions, regulatory setting, etc. are important in fulfilling this "spirit" of CEQA. The public deserves to understand the air quality implications of all projects approved in this air basin.

[50] See footnote 45
[51] Available at Caltrans' website (http://www.dot.ca.gov/hq/env/air/extsoft.htm)

Setting for Full Analysis Level (FAL) Projects. Lead Agencies should prepare a full air quality analysis for all projects determined to either obviously exceed SJVAPCD thresholds for significant air quality impacts or found to exceed the thresholds during cursory analysis and that cannot mitigate air quality impacts to less than significant levels. A Full Analysis Level report should contain the information described above for a Cursory Analysis Level report plus the environmental setting information described below.

- **Climate and Topography**. Provide a description of the influence of climate and topography on a project's impacts on local and regional air quality. A sample description of the SJVAB's climate and topography is located in the Technical Document and may be used as a basis in EIRs prepared for any project in the SJVAPCD.

- **Regulatory Environment**. Describe the regulatory requirements in the SJVAPCD. A sample description of the regulatory environment is located in the Technical Document. EIRs or MNDs with a full analysis should use this information.

- **Prevention of Significant Deterioration (PSD) Consideration.** The analysis should place special emphasis on air quality resources that are rare or unique to the region and would be affected by the project[52]. Regulatory requirements identify areas that are pristine and classified as Class I airsheds. These airsheds are subject to specific standards, e.g. Prevention of Significant Deterioration[53] requirements. Within the SJVAPCD, the Kings Canyon and Sequoia National Parks and Ansel Adams, Kaiser, John Muir, and Domeland Wilderness Areas are Class I areas. Any project proposed in the vicinity of one of these areas should note its proximity to a Class I area in the description of the project setting.

- **Air Quality Standards.** Identify state and federal AAQS for all criteria pollutants. Provide the air quality attainment status for the criteria pollutants. This data can be found in the Technical Document.

- **Ambient Air Quality.** Summarize ambient air quality, including data for at least the last three years from the air quality monitoring station(s) closest to the project site. The setting should also include basin-wide data for ozone given its regional characteristics. A sample description of existing air quality conditions is located in the Technical Document. The Technical Document also provides ambient air quality monitoring data. A Lead Agency should follow the sample format, utilizing data from the nearest monitoring station(s) as appropriate.

- **Existing Emissions.** Describe any existing emissions from the project site, if applicable. Existing emissions can be quantified using URBEMIS 7G for Windows or

[52] CCR §15125 (a)
[53] Code of Federal Regulations (40CFR 52.21)

with manual methods described later in this section. Include any SJVAPCD permitted stationary sources of emissions that are being eliminated.

- **Sensitive Receptors.** Identify any sensitive receptors located near the project site. For CEQA purposes, a sensitive receptor is generically defined as a location where human populations, especially children, seniors, and sick persons are found, and there is reasonable expectation of continuous human exposure according to the averaging period for the AAQS (e.g., 24-hour, 8-hour, 1-hour). These typically include residences, hospitals, and schools. Locations of sensitive receptors may or may not correspond with the location of the maximum off-site concentration. The location of sensitive receptors should be explained in terms that demonstrate the relationship between the project site and potential air quality impacts (e.g., proximity, topography, or upwind or downwind location).

  The analysis should also identify reasonably foreseeable sensitive receptors. This would include future receptors if development is pending, as well as potential receptors that could reasonably be sited nearby based on permitted zoning or land use designations. Land uses in the vicinity of the project site should be extensively described in the Land Use Section of an EIR. If no sensitive receptors are in the project vicinity, the Land Use Section may be referenced with an appropriate reference to the lack of sensitive receptors. If sensitive receptors are in the project vicinity, the Land Use Section may also be referenced, but the description of any sensitive receptors should be expanded upon as necessary for air quality impact analysis purposes.

- **Sources of Air Pollutants in Project Vicinity.** Identify sources of air pollutants on or near the project site. The description of existing air pollution sources should include criteria pollutants, toxic air contaminants, and nuisance emissions such as odors and dust. More detailed information regarding existing emissions, including emissions of odors and toxic air contaminants, may be obtained by contacting the SJVAPCD.

- **Transportation System.** Describe the transportation system serving the project site. Discuss traffic conditions, including traffic volumes and levels of service; transit service; and other relevant transportation facilities such as bicycle facilities, shuttle services, telecommuting centers, etc. The discussion of the existing transportation system should describe both current conditions and future conditions with the project. Much of this information may be located in the Traffic and Circulation section of the EIR (or Initial Study). Many EIR traffic and circulation sections, however, do not adequately describe bicycle facilities, telecommuting centers, and other alternative transportation forms. The traffic and circulation information may be referenced and/or summarized, but any additional information relative to non-motorized trip reduction alternatives not discussed should be described as necessary and appropriate for the project in the air quality setting.

5.5 EVALUATING CONSTRUCTION EMISSIONS

The SJVAPCD recommends separating emissions occurring in the construction phase of a project from emissions occurring in the operational phase for analysis purposes. The reason for this separation is that construction produces only temporary impacts while the operational phase will produce emissions indefinitely into the future. Although construction activities can produce substantial emissions and can represent a significant air quality impact, the effect is not permanent.

Types of Construction Emissions. Construction-related emissions come from a variety of activities including:

1) grading, excavation, road building, and other earth moving activities;

2) travel by construction equipment, especially on unpaved surfaces;

3) exhaust from construction equipment;

4) architectural coatings; and

5) asphalt paving.

Demolition and renovation of buildings also generate PM-10 emissions, and is of particular concern if the building(s) contain any asbestos-bearing materials[54]. Off-road construction equipment is often diesel powered and can be a substantial source of NOx emissions.

Evaluating PM-10 Emissions from Construction. PM-10 emissions from construction activity can vary considerably depending on factors such as the level of activity, the specific operations taking place, and weather and soil conditions. The SJVAPCD emphasizes implementation of effective and comprehensive control measures rather than detailed quantification of construction emissions. The SJVAPCD recommends that Lead Agencies consider the size of the construction area and the nature of the activities that will occur, and require the implementation of all feasible control measures (as indicated in Table 6-3).

PM-10 Emission Quantification. If a Lead Agency elects to quantify construction emissions, URBEMIS 7G for Windows can be used to quantify PM-10 emissions associated with grading and earthmoving. Manual calculation methods using generalized emission factors are available. Those wishing to manually calculate construction emissions should refer to the URBEMIS 7G for Windows Users Guide[55] or a report prepared under

[54] A CAL-OSHA qualified asbestos survey of the existing structure is required, prior to any renovation or demolition activity. If you have any questions concerning asbestos related requirements, please contact the SJVAPCD Asbestos Coordinator at the appropriate SJVAPCD Regional office (see Appendix B).

[55] Copies of URBEMIS 7G for Windows Users Guide and program can be obtained from ARB's website (http://www.arb.ca.gov/urbemis7/urbemis7.htm)

contract to the South Coast Air Quality Management District titled *Improvement of Specific Emission Factors (BACM Project No. 1), Final Report* by Midwest Research Institute, March 29, 1996. These factors may be used at a Lead Agency's discretion. The California Air Resources Board (ARB) indicates that these numbers will be incorporated into the U.S. Environmental Protection Agency's (EPA's) emission factors document Compilation of Air Pollutant Factors (AP-42).

Quantifying Demolition Emissions. Project construction sometimes involves the demolition of existing buildings. Demolition also produces PM-10 emissions. PM-10 emissions from demolition activities may be estimated using URBEMIS 7G for Windows. However, the Lead Agency can also manually quantify PM-10 emissions from demolition using the following emission factor: 0.00042 lbs. PM-10 per cubic feet of building volume.[56]

An important note is that buildings often include building materials containing asbestos. Airborne asbestos fibers pose a serious health threat if adequate control techniques are not carried out when the material is disturbed. The demolition or renovation of asbestos-containing building materials is subject to the limitations of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations as listed in the Code of Federal Regulations[57] requiring notification and inspection. Most demolitions and many renovations are subject to a CAL-OSHA Certified asbestos inspection prior to start of activity. The SJVAPCD's Asbestos Coordinator in the appropriate region should be consulted prior to commencing demolition or renovation of any building to determine inspection and compliance requirements.

Analyzing ROG and NOx Emissions from Construction Equipment. Very large construction projects may exceed the annual thresholds for ROG and NOx emissions. The SJVAPCD will recommend quantification methods for these projects on a case by case basis. In some cases, URBEMIS 7G for Windows may be used to estimate the emissions. Complex projects may require the use of specific emission factors available from the SJVAPCD.

5.6 EVALUATING EMISSIONS FROM PROJECT OPERATIONS

Project operations refer to activities that will occur at a project site when construction is complete and the site has been occupied with its intended use. Emissions from project operations can be divided into three main categories: indirect sources; area sources; and stationary sources. Indirect sources are defined as any building, facility, structure, or property that attracts or generates mobile source activity (autos and trucks). This includes shopping centers, employment sites, schools, housing developments, etc. Area sources are sources that individually emit small quantities of air pollutants, but which cumulatively may represent significant quantities of emissions. Water heaters, fireplaces, wood heaters,

[56] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993.
[57] 40CFR Part 61, Subpart M

lawn maintenance equipment, and application of paints and lacquers are examples of area source emissions. Stationary or point sources are equipment or devices operating at industrial and commercial facilities that directly emit air pollutants. Examples of facilities with stationary sources include manufacturing plants, oil refineries, sand and gravel operations, print shops, and gasoline stations.

Air quality impact assessments should evaluate all three categories of emissions when determining impacts from project operations. This section describes methods recommended by the SJVAPCD to accomplish this task. In addition, this section discusses procedures for evaluating impacts related to odor problems, emissions of toxic air contaminants, and accidental releases of hazardous/toxic materials

5.6.1 Calculating Area Source Emissions

The SJVAPCD recommends that URBEMIS 7G for Windows be used to calculate area source emissions. The program allows you to estimate area-source emissions for natural gas fuel consumption from space and water heating, wood stove and fireplace combustion emissions, landscape maintenance equipment, and consumer products. Consumer products, includes only reactive organic compound emissions released through the use of products such as hair sprays and deodorants. Due to the seasonal nature of fireplace and wood stove emissions, they should not be used in determining if a project will exceed ozone precursor thresholds.

The URBEMIS 7G for Windows program provides default assumptions for evaluating area source emissions for projects in the San Joaquin Valley. When the Lead Agency or consultant uses values other than default values, the air quality report should justify the assumptions.

5.6.2 Calculating Mobile Source Emissions

As noted above, virtually all land use development projects result in indirect source emissions due to the motor vehicle trips generated by the project. The following discussion describes how to calculate these emissions.

URBEMIS 7G for Windows. The SJVAPCD recommends using the program URBEMIS 7G for Windows for calculating indirect emissions from most development projects. The exceptions are general plan updates, large specific plans, and large general plan amendments, for which the analysis methods are described later in this section. URBEMIS 7G for Windows provides a reasonable estimate of project emissions considering the complexity of the factors affecting mobile source emissions. URBEMIS 7G for Windows can be run on any Windows™ 3.x/9x (it will not currently work with Windows NT). URBEMIS 7G for Windows uses EMFAC7G emission factors and Institute of Transportation Engineers (ITE) and San Diego Association of Governments trip generation rates. The program provides default values for all modeling parameters. Some of the

parameters are specific to several regions within California, including the San Joaquin Valley. However, where project-specific values for parameters, including trip generation, trip length, trip speed, vehicle fleet mix, percentage of cold starts, and temperature, are available they should be used. The source(s) of any project-specific data should be described and fully supported. The user may use the default values if project specific values are not available.

URBEMIS 7G for Windows calculates emissions of reactive organic gases (ROG), nitrogen oxides (NOx), carbon monoxide (CO) and respirable particulate matter (PM-10) and provides results either in pounds per day (summer or winter) or tons per year. Whereas the SJVAPCD's Thresholds of Significance are in tons per year, the District recommends any URBEMIS 7G for Windows' air quality analysis report be submitted in tons per year.

Because URBEMIS 7G for Windows includes more current emission factors (EMFAC7G), as well as other improvements, older versions of URBEMIS should not be used to estimate mobile source emissions. A new version of URBEMIS using EMFAC2000/2001 emission factors is under development. The SJVAPCD recommends using the newest version available. Consult the SJVAPCD web site or contact a SJVAPCD CEQA representative to determine the current version.

- **URBEMIS 7G for Windows - Mobile Source Emission Factors.** The source of emission factors for most California motor vehicle emission models is the ARB program EMFAC. EMFAC calculates vehicle emissions based on average emissions per each vehicle type (light duty passenger cars, light duty trucks, medium duty trucks, heavy-duty diesel, etc.), vehicle speed, starting conditions, temperature, year, and other factors. EMFAC generates an output in grams per mile of the various pollutants. The output can then be used in other models such as URBEMIS and DTIM or in manual calculations to arrive at project level emissions. ARB periodically revises EMFAC. At the time of this writing, the most current version is EMFAC7G.

- **URBEMIS 7G for Windows - Default Assumptions for Emission Calculations.** Calculations of mobile source emissions are dependent on a large number of variables, **but there are several that are critical**. These variables are trip length, average speed, and trip generation rates. Another variable, vehicle fleet mix, is important for projects that may have a larger or smaller share of truck traffic than average. URBEMIS 7G for Windows contains default values for these variables, but they are very general. The defaults may be used; however, the SJVAPCD encourages the use of project specific data whenever available. Typically, this information can be found in the results of project specific traffic studies. Often, shopping center developers have trip generation data and trip length estimates based on data collected from similar centers within the city or region that are superior to default values. When the Lead Agency or consultant uses other than default values, the air quality report should justify the assumptions.

- **URBEMIS 7G for Windows - Accounting for Internal Trips.** Transportation analyses for projects consisting of two or more land uses often adjust the number of anticipated

new vehicle trips to account for internal trips. These adjustments (or "capture rates") reflect the fact that some trips at multi-use projects will occur internally to the project. As a result, the total number of new vehicle trips associated with the project would be less than the sum of the trips expected from all of the individual land uses. URBEMIS 7G for Windows contains a new component that accounts for internal trips and allows the user to change assumptions. Traffic studies for such projects may be used to identify internal trip capture rates. The air quality analysis should include a clear explanation of all capture rate assumptions unless the URBEMIS 7G for Windows default numbers are used.

- **URBEMIS 7G for Windows - Accounting for Pass-by Trips.** Traffic studies for commercial projects often distinguish between primary trips and pass-by and diverted linked trips.[58] The air quality analysis for such projects may include emission reductions from pass-by and diverted linked trips. The emissions from these trips will be lower than for primary trips (due to shorter trip lengths), so emissions are less. URBEMIS 7G for Windows contains a component that accounts for these emissions. Adjustments can be made to trip length and cold start/hot start assumptions for pass-by and diverted linked trips. Assumptions regarding pass-by and diverted linked trips should be clearly identified and the underlying rationale explained.

Manual Calculations. Mobile source emissions associated with land use development may also be calculated manually. Manual calculation, however, is not recommended by the SJVAPCD. Never the less, if the Lead Agency or applicant wishes to manually calculate such emissions, a methodology is available from the Bay Area Air Quality Management District[59]. For this manual calculation, it is necessary to provide the following inputs: trip generation rate, average trip length and emission factors (varying by average vehicle speed and analysis year). The Lead Agency or applicant should provide, for review by the SJVAPCD, thorough documentation and justification for all assumptions used in manual calculation.

5.6.3 Estimating Carbon Monoxide Concentrations

Emissions and ambient concentrations of carbon monoxide have decreased greatly in recent years. These improvements are due largely to the introduction of lower emitting motor vehicles and cleaner burning fuels. The last exceedance of either the state or national CO standard recorded at any of the SJVAB's monitoring stations was in 1991. At present, all areas within the SJVAPCD have attained the federal CO standard and are attainment or unclassified for the state CO standard.

[58] Primary trips are trips made specifically to visit a particular facility. Pass-by trips are trips made as intermediate stops on the way to a primary trip destination. Diverted linked trips are trips attracted from roadways near a facility, but which require a diversion from the roadway to another roadway to access the facility.

[59] Bay Area Air Quality Management District can be reached at (415) 771-6000 or http://www.baaqmd.gov/.

Reasons for CO Analysis. Despite the progress and success in achieving CO standards, localized CO concentrations still warrant concern in the SJV and should still be assessed in environmental documents. The reasons for this are twofold. First, state and federal laws require the SJVAB to attain and **maintain** ambient air quality standards. The SJVAPCD must ensure that increased motor vehicle use and congestion do not nullify the great strides that have been made with respect to ambient concentrations of CO. Secondly, the SJVAPCD must safeguard against localized high concentrations of CO that may expose nearby sensitive receptors but not be recorded at monitoring sites. Because elevated CO concentrations are often localized, heavy traffic volumes and congestion can lead to high levels of CO, or "hotspots", while concentrations at the closest air quality monitoring station may be below state and federal standards.

Determining Significance of CO Impacts.

- **Preliminary Screening.** Due to the fact that increased CO concentrations are usually associated with roadways that are congested and with heavy traffic volume, the District has established that preliminary screening can be used to determine with fair certainty that the effect a project has on any given intersection would not cause a potential CO hotspot. Therefore, the District has established that if neither of the following criteria are met at all intersections affected by the developmental project, the project can be said to have no potential to create a violation of the CO standard:

  - A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity will be reduced to LOS E or F; or

  - A traffic study indicates that the project will substantially worsen an already existing LOS F on one or more streets or at more or more intersections in the project vicinity.

  If either of the above criteria can be associated with any intersection affected by the project, the applicant/consultant would need to conduct a CO Protocol Analysis to determine significance.

- **CO Protocol Analysis.** Even if the two above criteria are met, the project's influence on any given intersection may still not create a violation of the CO health standard thereby showing a significant effect on the air quality of the area. Prior to conducting a full CO air quality model, the effect of the project can still be determined to be less-than-significant by conducting an analysis using a protocol developed by the Institute of Transportation Studies at University of California, Davis[60] entitled Transportation Project-Level Carbon Monoxide Protocol. This is a project-level protocol for use by agencies to evaluate the potential local level CO impacts of a project. If the results of this analysis demonstrate no potential for significance, the Lead Agency should include

[60] Copies of the Protocol can be obtained by calling the Institute of Transportation Studies at UC Davis at (916) 752-6548 or on Caltrans' Air Quality website at http://www.dot.ca.gov/hq/env/air/extsoft.htm

a description of the Protocol Analysis results in a report to the District. If the results demonstrate that the project will potentially have a significant effect on any intersection, the Lead Agency should conduct a CO dispersion modeling study such as CALINE4[61].

- **Using CALINE4.** The SJVAPCD recommends using the CALINE4 dispersion model to estimate local CO concentrations resulting from motor vehicle emissions. CALINE4 was developed by Caltrans and is available from Caltrans and the SJVAPCD regional offices.

  The estimated CO concentrations from CALINE4 runs should be compared to state and federal CO standards to determine whether the project would have a significant air quality impact. If the results indicate CO concentrations below the standards, then no further CO analysis is required. If the results predict concentrations above the standards, the Lead Agency should make a finding of a significant impact unless mitigation measures can be implemented that reduce concentrations to meet the standards. The effectiveness of any proposed mitigation measure(s) should be quantified by estimating the effects of the measure(s) on traffic volumes and/or speeds, and then remodeling CO concentrations with CALINE4.

  The Lead Agency or consultant should check with Caltrans and the local Regional Transportation Planning Agency[62] to determine if CO modeling has already been accomplished for intersections impacted by the project. CO modeling may have been done for a highway expansion or plan amendment that includes the project.

5.7 EVALUATING ODOR IMPACTS

An analysis of potential odor impacts should be conducted for both of the following situations: 1) a potential source of objectionable odors is proposed for a location near existing sensitive receptors, *and* 2) sensitive receptors are proposed to be located near an existing source of objectionable odors. Section 4 of this GAMAQI discusses thresholds of significance for odor impacts.

Basis for Evaluating Odor Impacts. The occurrence and severity of odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptor(s). Therefore, to the extent feasible, the analysis of potential odor impacts should be based on SJVAPCD's experience and data regarding similar facilities in similar settings. Lead Agencies should contact the SJVAPCD's Compliance Division for information regarding specific facilities and categories of facilities, and associated odor complaint records. It is also necessary to

[61] Also available on Caltrans' Air Quality website at http://www.dot.ca.gov/hq/env/air/extsoft.htm
[62] A list of local Regional Transportation Agency's addresses and phone numbers are included in the Technical Document.

contact the local county Environmental Health Department to identify odor complaints filed with those agencies.

Criteria for Detailed Odor Analysis. The Lead Agency should prepare a more detailed analysis for any project that would result in an odor source and sensitive receptors being located closer to one another than the distances indicated in Table 4-2. When projects trigger the screening level distances in Table 4-2, the Lead Agency or consultant should contact the SJVAPCD's Compliance Division for information regarding odor complaints. For projects involving a new receptor being located near an existing odor source(s), the SJVAPCD's Compliance Division at the appropriate regional office should be contacted. The Compliance Division will provide information on odor complaints logged for the facility(ies) for the previous three years. Odor complaints should be mapped in relation to the odor source to establish a general boundary of any existing impacts.[63] The location of the proposed project should be identified.

For projects involving new receptors locating near an existing odor source where there is currently no nearby development and for new odor sources locating near existing receptors, the analysis should be based on a review of odor complaints for similar facilities.

In assessing potential odor impacts, consideration also should be given to local meteorological conditions, particularly the intensity and direction of prevailing winds. Local meteorological data can be obtained from the Internet at the National Weather Service at Hanford's web site. This can be found at: http://nimbo.wrh.noaa.gov/hanford/. As stated in Section 4, prevailing wind does not eliminate the possibility of significant odor impacts in upwind areas. The Lead Agency should evaluate the type of odor source and whether it is particularly objectionable to people.

5.8 EVALUATING IMPACTS OF HAZARDOUS AIR POLLUTANTS

The SJVAPCD limits emissions of and public exposure to hazardous air pollutants (HAPs)[64] through a number of programs. The potential for HAP emissions from new and modified stationary sources is reviewed by the SJVAPCD's Permit Services Division which implements the SJVAPCD's Risk Management Policy via the SJVAPCD's permitting process for stationary sources. Examples of sources requiring SJVAPCD permits are listed in Figure 1-2. HAP emissions from existing sources are limited by:

1) SJVAPCD adoption and enforcement of rules aimed at specific types of sources known to emit high levels of HAPs;

[63]Due to confidentiality requirements regarding odor complaints, the name of the complainant, date of complaint, and specific address of the complainant will not be provided. Location will be identified only by block.

[64]HAPs are also referred to in some documents and/or sources as HAZs or as Toxic Air Contaminants (TACs).

2) implementation of the Air Toxics "Hot Spots" (AB 2588) Program; and
3) implementation of the federal Title III Toxics program.

Procedures for Evaluating HAPs. When evaluating potential impacts related to HAPs, Lead Agencies should consider both of the following situations:

1) a new or modified source of HAPs is proposed for a location near an existing residential area or other sensitive receptor, and
2) a residential development or other sensitive receptor is proposed for a site near an existing source of HAPs.

For the first scenario, a source of HAPs proposed near receptors, the Lead Agency should consult with the SJVAPCD's CEQA Section for information regarding anticipated HAP emissions, potential health impacts, and control measures. Preparation of the environmental document should be closely coordinated with the SJVAPCD review of the facility's permit application when timing allows.

For the second scenario, sensitive receptors locating near sources of HAPs, the Lead Agency should consult with the SJVAPCD's CEQA Section to review information gathered pursuant to the AB 2588 Program[65]. As discussed in Section 4, the District's policies and regulations for implementing AB 2588 designate facilities as significant when they have a carcinogenic risk in excess of 10 in one million or a non-cancer risk Hazard Index of greater than one (if prescribed so by California's Office of Environmental Health Hazard Assessment).

The SJVAPCD is prioritizing these facilities based on the quantity and toxicity of the emissions, and their proximity to areas where the public may be exposed. Facilities put in the significant risk category are required to prepare a comprehensive, facility-wide health risk assessment. The Lead Agency should review the comprehensive health risk assessments for facilities subject to AB 2588 on file at the SJVAPCD offices. For facilities that risk assessments have been conducted, these assessments may be used to identify an area around the facility within which individuals would be exposed to cancer or non-cancer risks that would be identified as significant impacts. For facilities for which risk assessments have not been conducted, the SJVAPCD's Permit Services Section should be consulted to determine whether location of nearby sensitive receptors would alter the status of the facility with respect to AB 2588 (that is, cause the facility to become "high priority" and therefore trigger a risk assessment requirement).

5.9 EVALUATING CUMULATIVE AIR QUALITY IMPACTS

CEQA defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant

[65] Air Toxics "Hot Spots" Information and Assessment Act of 1987

projects[66]. An adequate cumulative impact analysis considers a project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project being assessed. The following describes SJVAPCD recommended procedures for fulfilling these requirements.

Evaluating Cumulative Ozone Impacts. Ozone impacts are the result of the cumulative emissions from numerous sources in the region and transport from outside the region. Ozone is formed in chemical reactions involving ROG, NOx, and sunlight. All but the largest individual sources emit ROG and NOx in amounts too small to have a measurable effect on ambient ozone concentrations by themselves. However, when all sources throughout the region are combined, they result in severe ozone problems. Lead Agencies should use the quantification methods described in Section 4 to determine if ROG or NOx emissions exceed SJVAPCD thresholds.

Evaluating Cumulative PM-10 Impacts. PM-10 has a similar cumulative regional emphasis when particulates are entrained into the atmosphere and build to unhealthful levels over time. PM-10, however, has the potential to cause significant local problems during periods of dry conditions accompanied by high winds, and during periods of heavy earth disturbing activities. PM-10 may have cumulative local impacts, if for example, several unrelated grading or earth moving projects are underway simultaneously at nearby sites. The SJVAPCD does not currently recommend a quantitative analysis of PM-10 emissions. For cumulative analysis, Lead Agencies should examine the potential PM-10 exposure to sensitive receptors near the project site from earth disturbing activities from the current project and any nearby projects that may occur at the same time. If it appears that the level of activity may cause an adverse impact, the Lead Agency should require the enhanced dust control measures listed in Section 6 to reduce the impact to less than significant levels.

Evaluating Cumulative CO Impacts. Cumulative carbon monoxide impacts are accounted for in the CO hotspot analysis described earlier in this section. The CALINE4 model uses background concentrations that include CO contributions from other sources. Traffic levels used in the model should include all reasonably foreseeable projects that will contribute traffic to the intersections and road segments being analyzed.

Evaluating Cumulative Hazardous Air Pollutant (HAP) Impacts. Cumulative analysis for HAPs focuses on local impacts on sensitive receptors. A single source of HAPs may be insignificant, but when combined with emissions from neighboring sources could expose sensitive receptors to significant pollutant levels. Cumulative analysis of HAPs can be accomplished by identifying all sources of these pollutants near the project site and using a dispersion model to determine exposure levels from the combined emissions of all sources. The SJVAPCD recommends a radius of 1 mile for HAP screening. Dispersion modeling, if indicated by initial screening, should include existing sources, the project, and any reasonably foreseeable projects.

[66] CCR §15355

5.10 SPECIAL ANALYSIS REQUIREMENTS FOR GENERAL PLANS AND LARGE SPECIFIC PLANS

Very large projects present unique challenges for assessing air quality impacts. General plans and large specific plans often cover 20 years or more development. These plans nearly always include a full range of land uses and densities to accommodate all types of new development. Although they identify land uses, typically a number of different uses are permitted by a single designation. The implication of this is that project level modeling is not effective except for the smallest, slowest growing communities. In addition, impacts tend to be regional in scope.

General plan updates and large specific plans nearly always require the Lead Agency to prepare an EIR. Because of the San Joaquin Valley's nonattainment status and the cumulative impacts of growth on air quality, these plans almost always have significant, unavoidable adverse air quality impacts. The analysis described for the Full Analysis Level (FAL) covers most requirements with the following exceptions:

Modeling for Large Projects. Modeling for general plans and large specific plans will vary depending on the size of the community and the scope of the changes proposed in the plans. The SJVAPCD recommends that communities that have a working transportation model use DTIM to estimate ozone precursor emissions. To the extent possible, the modeling assumptions used should be consistent with runs accomplished for demonstrating Transportation Conformity. The ARB mobile emission inventory model MVEI7G can be used in place of DTIM in jurisdictions that do not have access to DTIM. Results of a traffic study, assuming one is prepared, should be used to identify intersections and corridors requiring CO hot spot analysis. Locations predicted by the traffic model to experience high levels of traffic congestion should be modeled using the dispersion model CALINE4. The URBEMIS 7G for Windows program should only be used for minor general plan updates/amendments and small specific plans with a limited number of different uses.

Manual Quantification Methods. Communities without access to a transportation model may estimate increases in motor vehicle related ozone precursor emissions with manual calculations. A per capita emission factor based on average vehicle use and composite vehicle fleet emissions can be multiplied by the projected population increase accommodated by the plan. Similarly, a per capita or per dwelling unit emission factors can be used to quantify area source emissions (i.e., natural gas combustion for heating, and landscape maintenance equipment, etc.). The URBEMIS 7G for Windows area source component may be used for area source emissions. Although most small SJV communities do not experience traffic congestion to the extent that would cause a CO hot spot, CALINE4 may be used if the screening criteria listed in Section 5.5 are triggered.

SECTION 6 – MITIGATING AIR QUALITY IMPACTS

6.1 INTRODUCTION

CEQA requires Lead Agencies to mitigate or avoid significant environmental impacts associated with discretionary projects[67]. Environmental documents for projects that have any significant environmental impacts must identify feasible mitigation measures or alternatives to reduce the impacts below a level of significance. If after the identification of all feasible mitigation measures, a project is still deemed to have significant environmental impacts, the Lead Agency can approve a project, but must adopt a Statement of Overriding Consideration[68] to explain why further mitigation measures are not feasible and why approval of a project with significant unavoidable impacts is warranted. This section describes what the SJVAPCD considers to be feasible mitigation in light of existing regulations and research. The SJVAPCD recognizes that the final determination of feasibility will fall to the Lead Agency.

Section Organization. This section is organized as follows: First, it describes the feasible measures available for Lead Agencies to mitigate or eliminate air quality impacts. After identifying the measures, guidance is provided for evaluating their effectiveness. The section starts with large-scale, plan level mitigation and then moves to project level mitigation. The project level discussion is organized by the type of impact being mitigated:

- Mitigating Construction Impacts;
- Mitigating Impacts of Motor Vehicle Use Related to Projects;
- Mitigating Impacts from Area Sources;
- Mitigating Impacts from Hazardous Air Pollutants;
- Mitigating Odor Impacts.

Reason for Air Quality Mitigation. In addition to CEQA requirements, mitigation of impacts is needed to achieve federal and state air quality standards. All incremental emission sources, including those associated with land development, must be mitigated to the greatest extent possible in order to achieve and maintain ambient air quality standards.

[67] PRC §21002.1(b)
[68] CCR §15093

6.2 SELECTING APPROPRIATE MITIGATION MEASURES

Mitigation Measure Criteria. Air quality mitigation measures must, by definition, go beyond existing regulations. Regulatory programs are in place at the federal, state, and air district level to reduce air pollutant emissions from nearly all sources, yet they are not always sufficient to eliminate all air quality impacts. For example, the ARB motor vehicle program has dramatically reduced average tailpipe emissions from the vehicle fleet. However, motor vehicle emissions will be a major source of SJV pollution problems in the foreseeable future due to growth in the number of vehicles and in miles traveled.

The SJVAPCD advocates the following criteria for selecting appropriate air quality mitigation measures:

Criteria required by CEQA:

- Mitigation shall be enforceable by permit conditions, legally binding agreements, or other measures[69];
- Mitigation measures shall be capable of being monitored and enforced;

Recommended criteria:

- Mitigation measures should coincide with the level and timing of an impact;
- The agency responsible should have adequate resources to implement the mitigation;
- Mitigation measures should be carried out within a reasonable period. Mitigation measures taking more than five years should contain interim targets;
- Mitigation measure benefits should be quantified when methods acceptable to the SJVAPCD are available.

Selecting mitigation measures appropriate for a particular project can be a complex task. The complexity arises from several factors. CEQA applies to a wide variety of projects. Complete general plan updates covering thousands of acres are discretionary projects and so are parcel maps and even site plans in some jurisdictions. The general plan often only identifies the eventual use of a parcel of land in vague terms. The site plan review may occur too late in the process and affect too small of an area to allow effective mitigation measures to be identified. In addition, differences in conditions at a site greatly influence the effectiveness of mitigation measures. The overall approach recommended by the SJVAPCD is to use policy statements, design standards, and community-wide programs at the general plan/specific plan level, and site specific measures when the site specific uses are proposed.

Table 6-1 lists mitigation strategies by project type. The list illustrates the level of specificity needed at each phase of the development approval process.

[69] PRC §21081.6

Table 6-1
Mitigation Measures By Project Type

Project	Impact	Mitigation
General plan updates, large specific plans, new towns	Regional ozone impact, PM-10 impact, CO hot spots, toxic air emissions, odors	. Adopt air quality element/general plan air quality policies/specific plan policies . Adopt Air Quality Mitigation Fee Program[70] . Fund TCM[71] program: transit, bicycle, pedestrian, traffic flow improvements, transportation system management, rideshare, telecommuting, video-conferencing, etc. . Adopt air quality enhancing design guidelines/standards . Designate pedestrian/transit oriented development areas on general plan/specific plan/ planned development land use maps . Adopt ordinance limiting woodburning appliances/fireplace installations[72] . Fugitive dust regulation enforcement coordinated with SJVAPCD . Energy efficiency incentive programs . Local alternative fuels programs . Coordinate location of land uses to separate odor generators and sensitive receptors
General plan amendments, small specific plans, and some zone changes	Potential regional ozone impact, cumulative impacts, CO hot spots, toxic air emissions, odors	. Apply general plan policies, local ordinances, and programs from above to the project site or adopt similar site specific programs . Restrict residential traditional wood fireplaces, install natural gas fireplaces or inserts . Provide pedestrian/transit oriented project design . Contribute to Air Quality Mitigation Fee Fund . Contribute towards TCM implementation programs . Commit to on-site improvements; bikeways, transit infrastructure, pedestrian enhancements . Provide traffic flow improvements for areas impacted by the project

[70] The City of Stockton and the City of Turlock have adopted air quality mitigation fee programs
[71] Transportation Control Measures (TCMs) are programs and actions that are established for the purpose of reducing mobile source emission levels, through reducing the activity level of vehicles.
[72] Ordinances related to residential heating should emphasize elimination of fireplaces in new residences or requiring natural gas heating, rather than wood heating devices. Natural gas fired fireplaces can reduce emissions of PM-10 and CO as much as 99%, when compared to traditional open-hearth wood fireplaces. If wood heating is necessary, EPA certified pellet stoves/inserts are preferred over fireplaces or even conventional wood stoves. An EPA certified pellet stove/insert could reduce emissions of PM-10 and CO as much as 88%, when compared to traditional open-hearth wood fireplaces.

Table 6-1
Mitigation Measures by Project Type (cont.)

Project	Impact	Mitigation
Tentative maps, site plans, conditional use permits	Cumulative ozone impacts, CO, toxic air emissions, odors	. Apply general plan policies and local ordinances and programs from above to the project site . Pedestrian/Transit oriented site design . Provide on-site improvement: bikeways, transit infrastructure, pedestrian enhancements . Contribute to Air Quality Mitigation Fee Fund . Contribute to TCM implementation . Energy conservation measures above and beyond requirements . Require residences to install natural gas fireplaces or inserts in lieu of traditional open-hearth wood fireplaces[73] . Pay for fleet vehicle conversions to alternative fuels

6.3 MITIGATING PLAN LEVEL AIR QUALITY IMPACTS

Agencies preparing new or updated plans for their communities have special responsibilities for mitigating air quality impacts. Large scale plans and policy documents often set the pattern of new development for the next twenty or more years. Land use patterns can be laid out in ways that produce more or less air pollution. Policies can be set in motion that encourage or discourage air quality friendly development. The SJVAPCD encourages local agencies to view their general plans, community plans, and specific plans as opportunities to improve the Valley's air quality.

Policy as Air Quality Mitigation. The SJVAPCD's *Air Quality Guidelines for General Plans (*AQGGP) sets forth goals, policies, and implementation strategies for use in land use planning documents. The document provides seventy-seven policies that directly and indirectly benefit air quality. Its emphasis is on cities and counties developing a comprehensive approach to air quality that targets new growth areas, redevelopment areas, and programs that reach the entire community. The general plan is the "constitution" for local development, and, as such, provides a framework for deciding the way development will occur.

The SJVAPCD recommends that cities and counties incorporate as many air quality policies from the AQGGP as possible into their general plans, community plans, and specific plans to ensure that development occurs in ways that produce fewer air quality

[73] See note, previous page

impacts. To the extent that cities and counties can implement policies that make their communities more transit-, bicycle-, and pedestrian-friendly, and avoid land use conflicts that lead to toxics and nuisance problems, they can minimize the need to mitigate air quality impacts of individual development proposals. The strategies recommended by the AQGGP are summarized as follows:

- A commitment to determine and mitigate project level and cumulative air quality impacts under the California Environmental Quality Act (CEQA);
- A commitment to integrate land use plans, transportation plans, and air quality plans;
- A commitment to plan land uses in ways that support a multi-modal transportation system;
- A commitment to take local action to support programs that reduce congestion and vehicle trips;
- A commitment to plan land uses to minimize exposure to toxic air pollutant emissions from industrial and other sources;
- A commitment to reduce particulate emissions from sources under local jurisdiction;
- A commitment of support for Air District and public utility programs to reduce emissions from energy consumption and area sources (water heaters, woodstoves, fireplaces, barbecues, etc.).

Policy will do nothing to improve air quality unless it is effectively implemented. Policies promoting land use and design measures are most effective if implemented community-wide, or even at the subregional, level. Issues such as allowable land use densities, mixing of land uses, street standards, parking requirements, etc. are most appropriately addressed throughout the entire community or sub-region. Implementing mechanisms such as zoning ordinances, parking standards, and design guidelines, may need to be revised to address these issues. Implementation of these strategies on an individual project basis can still be beneficial, even absent a community-wide strategy, but the benefits will be greater if implemented broadly.

6.4 SJVAPCD SUPPORT FOR LAND USE STRATEGIES

By far the largest air quality impact of plan implementation is related to growth in motor vehicle use. Typically, motor vehicle emissions account for 90 percent or more of total emissions attributable to new commercial and residential projects. This being the case, mitigation measures should emphasize strategies that reduce growth in this emission source. There are four primary ways to reduce motor vehicle emissions:

1) Shift travel from single-occupant automobiles to less-polluting or non-polluting modes such as transit, carpools, bicycling, and walking;

2) Eliminate the need for trips and reduce the distances traveled through the design, mix, and location of land uses and roads;

3) Change to vehicles using cleaner burning fuels; and

4) Improve traffic flow.[74]

There is increasing recognition that land use pattern and site design are critical to the success of measures implementing the first two strategies.

Why Land Use Strategies Work. Factors important for influencing travel mode selection and trip generation include the location, intensity, configuration, and design of land uses. Land use patterns typical of post-World War II developments have contributed to increased reliance on the automobile and therefore greater pollutant emissions. Characteristics that contribute to automobile dependency include: low residential and commercial densities, segregated land uses, and street and site design guided solely by the needs for automobile access. Traditional neighborhood designs, development patterns, and densities common before World War II have been found to generate fewer vehicle trips and miles traveled. New development patterns referred to as "neo-traditional" designs utilize many of the features of pre-World War II development integrated with current practices and preferences to attain a variety of transportation and other benefits.

Recent studies comparing trip generation and miles traveled in traditional neighborhood developments and current development patterns have shown substantial differences. Cervero's study[75] of Bay Area neighborhoods showed an overall 10 percent higher share of non-work trips by foot, bicycle, or transit in a mixed-use, pedestrian-oriented neighborhood when compared with a low density suburban neighborhood. Some of the factors thought to be responsible for this difference are described below.

- Residential and commercial developments must be of sufficient density to support transit service.

- Neighborhoods must be sufficiently "compact" to encourage walking and biking for errands, socializing, etc.

[74] Measures that improve traffic flow usually reduce local carbon monoxide levels and reactive organic gases; however, oxides of nitrogen emissions can increase with the greater vehicle speeds and traffic volume allowed by the flow improvement.

[75] Cervero, Robert and Radisch, Carolyn, *Travel Choices in Pedestrian Versus Automobile Oriented Neighborhoods*, Working Paper 644, Institute of Urban and Regional Development, University of California, Berkeley, July 1995.

- Houses, jobs, and services should be located close enough together to allow walking and biking for at least some trips.

- The circulation network and the design of individual streets should provide a safe and attractive environment for bicyclists and pedestrians.

- The designs of individual development projects should provide direct, safe, and attractive pedestrian access to transit stops and nearby development.

- The community should have a rough balance between the number of jobs and the number of employed residents.

Benefits of Incremental Improvements. Solutions do not necessarily have to occur on a grand scale. Incremental improvements can be made by actions as simple as including a neighborhood commercial center within a residential development, locating a child care center near a transit station, placing parking behind a commercial building, or providing sidewalks and benches in new subdivisions or commercial development. The SJVAPCD strongly encourages Lead Agencies and project proponents to take advantage of every opportunity to make development projects more pedestrian-, bicycle-, and transit-friendly.

Air Quality Design Guidelines. The SJVAPCD encourages cities and counties to adopt air quality friendly design guidelines as part of a general plan implementation strategy. Most current design practices can be improved upon. The SJVAPCD recommends the following websites to get ideas and concepts on what constitutes land use and design strategies that would be beneficial for air quality:

- The Center of Excellence for Sustainable Development (http://www.sustainable.doe.gov/)
- The Local Government Commission's Center for Livable Communities (http://www.lgc.org/clc/welcome.html)
- Walkable Communities, Inc. (http://www.walkable.org/)
- PLANetizen (http://216.103.50.149/planetizen/)

Design guidelines can be voluntary suggestions for developers or they can be standards adopted by ordinance that must be followed. The choice is up to the local jurisdiction. Numerous examples of design guidelines with air quality benefits are also available from California communities including Sacramento, San Diego, Modesto, and Merced. Contact the regional SJVAPCD CEQA representative for more information on design guidelines.

Other Benefits of Land Use Strategies. Improved coordination of land use and transportation planning and greater emphasis on making communities more transit-, bicycle- and pedestrian-friendly can reduce reliance on the automobile for all kinds of trips: trips to work, shopping, school, recreation, and personal business. Such strategies can result in many other benefits to the community as well, such as reduced traffic congestion,

energy conservation, preservation of open space, improved water quality (fewer contaminants in urban run-off), and more attractive, cohesive communities.

Transportation-Related Land Use Strategies. A study released by the ARB in June 1995 may be especially useful to Lead Agencies considering land use strategies to reduce air pollutant emissions. The report, prepared by JHK & Associates, is titled *Transportation-Related Land Use Strategies to Minimize Motor Vehicle Emissions: An Indirect Source Research Study*. Following are a number of land use strategies that the report explains can reduce motor vehicle use and emissions:

- Provide pedestrian facilities;
- Increase density near transit corridors;
- Increase density near transit stations;
- Encourage mixed-use development;
- Encourage infill and densification;
- Develop concentrated activity centers;
- Strengthen downtowns;
- Develop interconnected street network; and
- Provide strategic parking facilities.

The report provides estimates of the measures' effectiveness in reducing vehicle use and emissions in various types of communities (urban, suburban, and exurban). The estimated ranges of effectiveness are based on data from California communities. It is hoped that by identifying ranges of effectiveness for the land use measures, local officials will be able to set performance goals (e.g., vehicle trips or emissions per household) for their communities. The report recommends combinations of strategies to achieve the performance goals, and provides guidance on implementation mechanisms. One of the study's findings is that although it is difficult to quantify reductions in vehicle use and emissions from individual strategies applied at specific sites, combinations of strategies implemented community-wide can achieve significant reductions in vehicle use and emissions. The report is available from ARB's Transportation Strategies Group.

Reducing Land Use Conflicts. Land use considerations also can reduce air quality problems not related to motor vehicle use. By separating residential areas and other sensitive receptors from sources of odors, dust, and toxic air contaminants, health and nuisance impacts can be minimized. Buffer zones should always be provided between sensitive receptors and sources of odors, dust, and toxics.

6.4.1 Quantifying Plan Level Mitigation

Quantifying plan level mitigation measures is difficult, but possible. The most effective method to calculate mobile source reductions would be to use a mode split traffic model to show the difference in trips, vehicle miles traveled and emissions based on projected

increases in carpooling, transit, bicycling, and walking. Other regional traffic models without mode-split capability could be used by applying a straight trip or vehicle miles traveled (VMT) reduction percentage estimate to the modeling results. The emissions calculations for the different scenarios can be done with Caltrans' DTIM or ARB's MVEI7G.

The potential change in mode split, trips, and VMT is dependent on a number of factors. The extent of new development in transit and pedestrian oriented patterns, and the timing of buildout of the land uses and transportation system, are critical factors. As a community is built in these new patterns over time, a greater share of the population will be capable of using alternatives to the automobile. However, transportation infrastructure such as light rail will only become feasible when population and jobs-density at both ends of the line are high enough to produce reasonable ridership. So, in the early years, transit mode share would likely remain low, and in later years when the rail system comes on line, transit share would improve rapidly. On the other hand, pedestrian and bicycle trips are often shorter neighborhood trips. The benefits of pedestrian and bicycle-oriented development would therefore be realized when the neighborhood builds out. Since neighborhood commercial and institutional development that will attract pedestrian and bicycle trips typically follow residential construction, these mode shares will also be low in the early phases of development.

The benefits of community programs to reduce area source emissions from sources such as residential water and space heating, landscape maintenance, and woodburning can be quantified based on population growth projections and estimates of penetration of the programs. Emission factors for the standard equipment and devices and for less polluting alternatives can then be used to calculate emissions under the different scenarios. The URBEMIS 7G for Windows area source component contains many of these emission factors as well as mitigation measures quantified in terms of percent reduction.

The quantification methods for land use strategies and area source measures require the use of judgment in developing assumptions. As with any attempt to predict human behavior, absolute accuracy is not possible. Long term monitoring of program effectiveness is needed to enable course corrections should strategies be found less effective than predicted.

6.5 MITIGATING PROJECT LEVEL IMPACTS

For this discussion, the SJVAPCD considers a "project" to be a development proposal that is generally well defined as to final use and project design. However, there is no definitive line between plan and project. For example, in some cases, a developer will file a general plan amendment, zone change, and subdivision map or site plan simultaneously. In other cases, the general plan amendment is filed first and the other actions are filed later pending approval of the plan amendment. Some specific plans provide a high level of design detail and some land use approvals for individual parcels provide few details of the final use.

This being the case, mitigation measures for each project are best identified on a project by project basis.

This section provides separate discussions on mitigating temporary construction emissions and on indefinite operational emissions. The impacts during these two phases are quite different and so call for different mitigation solutions.

6.5.1 Mitigating Construction Impacts

Although the impacts from construction related air pollutant emissions are temporary in duration, such emissions can still represent a significant air quality impact. In some cases, construction impacts may represent the largest air quality impact associated with a proposed project. Construction activities such as grading, excavation, and travel on unpaved surfaces can generate substantial amounts of dust, and can lead to elevated concentrations of PM-10. Emissions from construction equipment engines also can contribute to elevated concentrations of PM-10 and CO, as well as increased emissions of ozone precursors.

Fugitive Dust Control Measures. Control measures for construction emissions of PM-10 are listed in Tables 6-2 and 6-3. Table 6-2 summarizes the requirements of a series of SJVAPCD rules known collectively as Regulation VIII. The purpose of Regulation VIII is to reduce the amount of PM-10 entrained into the atmosphere as a result of emissions generated from anthropogenic (man-made) fugitive dust sources. Compliance with Regulation VIII does not constitute mitigation because it is already required by law. Table 6-3 contains Enhanced and Additional Control Measures that will provide a greater degree of PM-10 reduction than Regulation VIII. The SJVAPCD will recommend these enhanced and additional measures when project conditions warrant; e.g. potential for impacting sensitive receptors, construction sites of significant size, or any other conditions that may justify additional emission reductions.

As noted previously in Section 4, the SJVAPCD does not require Lead Agencies to provide detailed quantification of construction emissions. Occasionally, some major construction projects such as large scale pipelines, water projects, mining projects, etc., will require quantification. Similarly, Lead Agencies need not quantify emission reductions from construction-related mitigation measures. The SJVAPCD's recommended approach to mitigating construction emissions focuses on a consideration of whether all feasible control measures are being implemented. (See Section 4 for further information.) If a Lead Agency chooses to quantify the effect of construction-related mitigation measures, the Lead Agency should use the construction emissions module in URBEMIS 7G for Windows or emission factors from the EPA's Compilation of Air Pollution Emission Factors (AP-42).

Table 6-2
Regulation VIII Control Measures for Construction Emissions of PM-10

Regulation VIII Control Measures. - The following controls are required to be implemented at all construction sites. (Includes changes effective May 15, 2002)
. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. . All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. . All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. . With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition. . When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. . All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. *(The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.)* . Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. . Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. . Any site with 150 or more vehicle trips per day shall prevent carryout and trackout.

Table 6-3
Enhanced and Additional Control Measures for Construction Emissions of PM-10

Enhanced Control Measures. - The following measures should be implemented at construction sites when required to mitigate significant PM-10 impacts (note, these measures are to be implemented in addition to Regulation VIII requirements):
. Limit traffic speeds on unpaved roads to 15 mph; and . Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
Additional Control Measures. - The following control measures are strongly encouraged at construction sites that are large in area, located near sensitive receptors, or which for any other reason warrant additional emissions reductions:
. Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site; . Install wind breaks at windward side(s) of construction areas; . Suspend excavation and grading activity when winds exceed 20 mph; and* . Limit area subject to excavation, grading, and other construction activity at any one time. * Regardless of windspeed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation.

Mitigating Emissions from Construction Equipment. The discussion of construction impacts and mitigation measures in these Guidelines focuses primarily on PM-10 emissions from fugitive dust sources. However, Lead Agencies seeking to reduce emissions from construction equipment exhaust should also consider the mitigation measures in Table 6-4. The SJVAPCD recognizes that these measures are difficult to implement due to poor availability of alternative fueled equipment and the challenge of monitoring these activities. New control devices are expected to soon be available that can substantially reduce PM and NOx emissions from diesel engines. Manufacturers are developing PM oxidation catalysts and NOx adsorbers that will be sold as retrofit kits and as original equipment. This new technology requires the use of ultra low-sulfur diesel (15 ppm) to be effective.

Table 6-4
Construction Equipment Mitigation Measures

Emission Source	Mitigation Measure
Heavy duty equipment (scrapers, graders, trenchers, earth movers, etc.)	• Use of alternative fueled or catalyst equipped diesel construction equipment • Minimize idling time (e.g., 10 minute maximum) • Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use • Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set) • Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways • Implement activity management (e.g. rescheduling activities to reduce short-term impacts)

6.5.2 Mitigating Impacts from Project Operation

Air quality impacts from project operations are caused by motor vehicle use related to the project, and by combustion of fuels for space heating, cooking, and landscape maintenance. In the case of industrial projects, the impacts are caused by all of the above sources and by the operation of polluting equipment, devices, and processes used in manufacturing. Mitigation measures identified by the SJVAPCD to reduce operational air quality impacts are listed and discussed below.

Mitigating Impacts from Motor Vehicles. Several general approaches can be taken to reduce emissions from motor vehicles:

- Reduce vehicle trips. These measures reduce air pollutant emissions by entirely eliminating some of the vehicle trips associated with a project. An example is the provision of bicycle facilities to encourage bicycle use instead of driving.

- Reduce vehicle miles traveled. These measures reduce emissions by reducing the length of vehicle trips associated with a project. An example is satellite offices/telecommuting centers provided to reduce the length of employee commute trips.

- Use of low emission vehicles. These measures do not aim to reduce trips or VMT, but rather promote the use of fuels that are less polluting than gasoline or diesel. Examples

are the conversion of a vehicle fleet to operate on compressed natural gas and the purchase of an electric vehicle.

- Improve traffic flows/reduce congestion. These measures reduce emissions by reducing traffic congestion and/or reducing stops and starts. This allows vehicles to operate at steady and moderate speeds, and thus lowers pollution per mile traveled. An example is timing the traffic signals on an arterial to facilitate uninterrupted travel.

- Support measures. These measures may not directly reduce emissions, but rather support and facilitate other emission reduction strategies. An example is a guaranteed ride home program implemented at a worksite in order to encourage employees to use commute alternatives by allaying concerns over being without a vehicle in case of emergency.

The SJVAPCD recommends that Lead Agencies use each of the above categories of measures where appropriate. However, caution should be used when selecting some types of measures. In general, measures that reduce vehicle trips entirely achieve the greatest emission reductions. This is because vehicle emissions are highest during the first several miles of a trip. Measures to reduce VMT are most effective when the trips reduced are long so that the cold start emissions are less important. PM-10 emissions receive the most benefit by reducing VMT. This is because PM-10 emissions (due to entrained road dust) are more directly correlated to VMT. Traffic flow improvements may be beneficial to CO and ROG levels if congestion is a major factor, but may cause NOx to increase with speed and greater volume of traffic.

Tables 6-5 and 6-6 list mitigation measures to reduce motor vehicle use. The measures listed are also found in the URBEMIS 7G for Windows Mobile Source Mitigation Component. The measures in Tables 6-5 (a) through (d) present infrastructure-based mitigation measures and are organized by the transportation mode that the measure is intended to support. Tables 6-6 (a) through (f) provide operational measures that are usually implemented by employers.

Table 6-5 (a)
Transit Infrastructure-Based Mitigation Measures

Mitigation Measures[76]	Supporting Factors to Enhance Effectiveness
Provide transit enhancing infrastructure that includes: transit shelters, benches, etc.; street lighting; route signs and displays; and/or bus turnouts/bulbs	. Type of transit service (heavy rail, light rail, bus) - rail attracts more riders . Distance from home to transit station and transit station to work - ridership 2-4 times higher within ½ mile . Density of land use - higher densities provide greater ridership . Mix of uses at either end of transit trip - mixed use increases transit use . Pedestrian accessibility to transit system

Table 6-5 (b)
VMT Infrastructure-Based Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide park and ride lots and/or satellite telecommuting centers	. Distance to employment centers - long commute attracts park and ride users and telecommuters . Degree of congestion on routes to employment centers . Availability of high occupant vehicle (HOV) lanes, express transit, rail, rideshare incentives . Type of employers - information based jobs have higher telecommuting potential

[76] All employer-based measures must be implemented voluntarily. SB 437 (Lewis) prohibits local agencies from requiring employer-based trip reduction programs. However, if an applicant elects to undertake these measures to reduce air quality and traffic impacts, credit should still apply to the project.

Table 6-5 (c)
Pedestrian Infrastructure-Based Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide pedestrian enhancing infrastructure that includes: sidewalks and pedestrian paths; direct pedestrian connections; street trees to shade sidewalks; pedestrian safety designs/ infrastructure; street furniture and artwork; street lighting; and/or pedestrian signalization and signage	. Degree of sidewalk/path coverage within walking distance . Mixture of uses to attract pedestrians within walking distance . Pedestrian circulation provides direct access (streets interconnected/pedestrian shortcuts) . Degree of street tree coverage along most used routes . Street system designed to enhance pedestrian safety (traffic calming, signalization, separation from traffic, limited curb cuts[77], etc.) . Pedestrian routes provide safety from crime (eyes on the street, high activity levels, lack of gangs) . Walking routes to important destinations provide visual interest for pedestrians

[77] Curb cuts are ramps or driveways that cross sidewalks to get vehicles from main roadway to parking area. May be of concern due to the potential to conflict with pedestrian or bicycle traffic.

Table 6-5 (d)
Bicycle Infrastructure-Based Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide bicycle enhancing infrastructure that includes: bikeways/ paths connecting to a bikeway system; secure bicycle parking; and/or employee lockers and showers	. Degree area within bicycling distance (5 miles max.) is served by interconnected bikeways . Degree area within bicycling distance has wide paved shoulders and limited curb cuts[78] . Speed limits on routes to frequent destinations - low speed limits enhance cycling . Presence of college or university within cycling distance . Mixture of uses that attract bicyclists within cycling distance . Availability of bicycle parking within cycling distance - communities with bike parking ordinance tend to have high availability

Table 6-6 (a)
Rideshare Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Implement carpool/ vanpool program e.g., carpool ridematching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.	. Employer provides support measures such as carpool/vanpool subsidies, preferential parking, guaranteed ride home program, etc. . Coordinate with regional ridesharing organizations, e.g., Commute Connection, Central Valley Ridesharing, Kern Rideshare [79] . Multiple smaller worksites coordinate programs . Limited parking supply and/or implementation of parking fees or parking cash-out

[78] See note previous page
[79] Contact your local CEQA representative for identification and contact information of appropriate regional ridesharing organization

Table 6-6 (b)
Services Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide on-site shops and services for employees, such as cafeteria, bank/ ATM, dry cleaners, convenience market, etc.	• Sufficient number of employees at worksite, or cooperation among multiple worksites • Safe, direct pedestrian access between employment and retail areas • Jurisdiction provides density bonuses, other incentives to encourage mixed land uses
Provide on-site child care, or contribute to off-site child care within walking distance	• Sufficient number of employees at worksite, or cooperation among multiple worksites

Table 6-6 (c)
Shuttle Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Establish mid-day shuttle service from worksite to food service establishments/ commercial areas	• Sufficient number of employees at worksite, or cooperation among multiple worksites • Commercial area located within 3 miles • Frequent, scheduled service during lunch hours • Coordination among multiple employers, e.g., at business parks • Provide commute shuttle to transit station, use same vehicle for mid-day shuttle
Provide shuttle service to transit stations/multimodal centers	• Major transit facility/multimodal center located within 3 miles of project • Transit use incentives for employees, e.g., on-site distribution of passes, subsidized transit passes, etc. • Frequent, scheduled service during peak commute periods • Coordination among multiple employers, e.g., at business parks • Free or subsidized service • Provide mid-day shuttle to commercial areas, use same vehicle for commute shuttle

Table 6-6 (d)
Parking Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide preferential parking (e.g., near building entrance, sheltered area, etc.) for carpool and vanpool vehicles	. Most effective if parking supply is limited and/or located far from building entrance
Implement parking fees for single occupancy vehicle commuters	. Reduced or waived fees for carpools and vanpools . Complemented by transit, ridesharing programs, other commute alternatives . Revenues used to support commute alternatives . Provisions in place to avoid off-site parking spillover
Implement parking cash-out program for employees (i.e., non-driving employees receive transportation allowance equivalent to value of subsidized parking)	. Complemented by transit, ridesharing programs, other commute alternatives . Implement at worksites not subject to state parking cash-out requirements . Tax benefits if travel allowance offered as transit/ridesharing subsidy . Provisions in place to avoid off-site parking spillover

Table 6-6 (e)
Transit Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide transit incentives	. Transit use incentives for employees, e.g., on-site distribution of passes, subsidized transit passes, etc. . Transit route maps and schedules posted at worksite . Design and locate buildings to facilitate transit access, e.g., locate building entrances near transit stops, eliminate building setbacks, etc.

Table 6-6 (f)
Other Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Implement compressed work week schedule (e.g., 4/40, 9/80)	• Consult with employees prior to program implementation
Implement home-based telecommuting program	• Participation increased if employer provides/assists with provision of equipment (modem, computer, etc.) • Especially effective if employee commute trips are long

6.5.3 Quantifying Mitigation Measures for Project Operations

The effectiveness of proposed mitigation measures should be quantified when feasible. Because the measures' effectiveness will depend greatly on the specific characteristics of the project and its setting, this quantification should be based on a project-specific analysis. The SJVAPCD recommends using the URBEMIS 7G for Windows mitigation component to estimate trip and vehicle miles traveled (VMT) reductions for most projects. However, if a traffic model containing mode split analysis capability is used to calculate trip generation for use in URBEMIS 7G for Windows, the mitigation quantification component should not be used. The URBEMIS 7G for Windows mitigation component would double count part of the trip reduction estimates already credited to other transportation modes in the mode split model. This may also occur if trip generation numbers used in URBEMIS 7G for Windows are derived from a local traffic study. In this case, the trip generation numbers may already reflect the benefit of measures and infrastructure in place in the community.

When a mode split model or local traffic study is used, estimates of mitigation measure effectiveness will require closer analysis. Guidance on performing this analysis and several cautionary notes regarding estimating the effectiveness of mitigation measures are provided below:

⇒ **Clearly explain the assumptions underlying the environmental document's analysis of mitigation measures' effectiveness.** The analysis should specifically describe the mitigation measure, identify the source(s) of air pollutants that are expected to be affected by the measure, clearly explain how and to what extent the measure will affect the source(s), and identify the basis for the estimate (empirical observations, computer modeling, case studies, etc.). Critical assumptions should be linked to the mitigation monitoring and reporting program. For example, if the environmental analysis for a commercial development assumes that 20% of employees will carpool to work, then such an objective should be included in the

mitigation monitoring and reporting program as a test of whether the measure is being implemented.

⇒ **Be specific regarding implementation of mitigation measures.** The environmental document should describe each mitigation measure in detail, identify who is responsible for implementing the measure, and clearly explain how and when the measure will be implemented. Methods for assessing the measure's effectiveness once it is in place, and possible triggers for additional mitigation if necessary, are also desirable. This level of detail regarding mitigation measure implementation frequently is not addressed until the preparation of the mitigation monitoring and reporting program, which often takes place very late in the environmental review process. In order to reliably assess the effectiveness and feasibility of mitigation measures, however, the SJVAPCD determines that it necessary to consider the specifics of mitigation measure implementation as early in the environmental review process as possible.

⇒ **Avoid double counting the effect of proposed mitigation measures.** The project description and assumptions underlying the analysis of project impacts should be carefully considered when estimating the effect of mitigation measures. If certain conditions or behavior are assumed in the impact analysis, then credit may not be claimed when proposing mitigation measures. For example, if the traffic and air quality analyses for a proposed project assume that a certain percentage of people will access the project by transit or bicycle, then any credit claimed for transit- or bicycle-related mitigation must clearly demonstrate effectiveness above and beyond the mode split assumed in the impact analysis.

In some cases, it simply may not be possible to quantify the effect of proposed mitigation measures. It may be that the specific conditions surrounding a particular project are so unique as to render extrapolation from other examples unreliable. A proposed measure may be innovative, with little precedent. The combined effects of a package of measures may be too difficult to quantify. While a certain degree of professional judgment is usually involved in estimating the effectiveness of mitigation measures, excessively speculative estimates should be avoided. If the Lead Agency cannot quantify mitigation effectiveness with a reasonable degree of certainty, the environmental document should at least address effectiveness qualitatively. If the Lead Agency makes a finding that non-quantified mitigation measures reduce an impact to a level of insignificance, the document should provide a detailed justification of that conclusion.

Using URBEMIS 7G for Windows to Quantify Emission Reductions. URBEMIS is a computer program that can be used to estimate emissions associated with land use development projects in California, such as residential neighborhoods, shopping centers, office buildings, etc. URBEMIS stands for "Urban Emissions Model". The newest version (URBEMIS 7G for Windows) contains a component that will quantify emissions reductions achieved when projects include mitigation measures. A brief overview of the

mitigation component is provided below. For complete instructions, see the URBEMIS 7G for Windows User's Guide[80].

The URBEMIS 7G for Windows mitigation component allows the program user to select mitigation measures from three sub-components. These are construction measures, area source measures, and mobile source measures. The user selects measures appropriate for the project and the model automatically compiles a percent reduction for each pollutant. The reduction efficiencies can be modified for the construction and area source components, but the report generated will indicate that non-default values were used. The SJVAPCD requires the user to provide justification when reduction efficiencies are changed.

URBEMIS Mobile Source Mitigation Component. The mobile source component is the most complex of the three sub-components. The program requires the user to select environmental conditions of the area surrounding the project to determine the effectiveness of the measures and to give credit for conditions surrounding the project site. Credit is provided for conditions in the surrounding environment that are beyond control of the project proponent (i.e. transit service, regional bikeways, complimentary uses within walking distance) that will have the effect of reducing trips or miles traveled by residents or users of the project.

The mobile source mitigation component should only be used with default trip generation rates. The reduction percentages are based on a comparison with average trip generation rates from the ITE Trip Generation Manual. If other trip generation rates are used that account for alternative modes and trip reduction programs, the program will double credit the reduction percentages.

Area Source Component. The area source component will allow the user to generate estimates of area source emissions using default assumptions programmed into the model. Users with detailed information regarding area sources for a given project will be able to modify the default values to more accurately predict expected emissions. Whether using default assumptions or project specific data, URBEMIS 7G for Windows will generate a report listing all of the assumptions used to estimate area source emissions.

Area source mitigation measures are listed in Table 6-7.

Optional Construction Emissions Component. The construction emissions component allows the user to generate estimates of PM-10, ROG, NOx, and CO that occur as a result of demolition, grading, and building construction.

[80] Available from ARB's website at http://www.arb.ca.gov/urbemis7/urbemis7.htm

Table 6-7
Area Source Mitigation Measures

Emission Source	Mitigation
Residential Water Heaters	. Use solar or low-emission water heaters (beyond Rule 4902) . Use central water heaters
Residential Energy Efficiency	. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs . Increase wall and attic insulation beyond Title 24 requirements
Commercial Water Heaters	. Use solar or low-emission water heaters . Use central water heating systems
Commercial Energy Efficiency	. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs . Increase wall and attic insulation beyond Title 24 requirements
Industrial Heating	. Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs
Landscape Maintenance	. Provide electric maintenance equipment
Residential Heating	. Eliminate or limit the amount of traditional fireplaces installed (i.e. natural gas fireplaces/inserts or at least EPA certified wood stoves or inserts instead of open hearth fireplaces)

The URBEMIS 7G for Windows user will have the option of "turning off" this component if he/she wishes. If the construction emissions component is not used, then URBEMIS 7G for Windows will print a statement in the report that the "No Construction Emissions" option was selected.

If the construction emissions component is used, then either default or project specific options are available. As with the components described above, URBEMIS 7G for Windows will print out a list of assumptions used.

6.6 MITIGATING IMPACTS FROM HAZARDOUS AIR POLLUTANTS

Specific mitigation measures should be identified and considered for those projects that may release toxic or hazardous air pollutants to the atmosphere in amounts that may be injurious to nearby populations. Such mitigation measures should consider both routine and non-routine toxic air pollutant releases. Mitigation measures may involve handling, storage, and disposal methods that minimize release of the subject substances to the atmosphere. In some cases, air pollution control devices or process operation modifications can be employed. Furthermore, facilities that may release toxic or hazardous substances to the atmosphere should not be located adjacent to sensitive receptors such as residences, schools, day-care centers, extended-care facilities, and hospitals.

Lead Agencies should also be aware that many facilities such as dry cleaners and gasoline stations produce toxic emissions, but under most circumstances, existing controls reduce impacts to less than significant levels. Therefore, it would not be appropriate to automatically reject such facilities just because they are near a sensitive receptor. More detailed analysis to determine the potential risk and feasible control measures may be appropriate in these cases. Facilities and equipment that require permits from the SJVAPCD are screened for risks from toxic emissions and those exceeding thresholds (see Section 4.3.2) are subject to detailed health risk assessments. Projects exceeding deminimus levels are required to install Toxic Best Available Control Technology (T-BACT) to reduce risks to below significance. If a significant impact remains after T-BACT is implemented, the permit may not be issued unless it meets the discretionary approval criteria of the SJVAPCD Risk Management Policy for Permitting New and Modified Sources.

Projects where significant numbers of diesel powered vehicles will be operating such as truck stops, transit centers, and warehousing may create risks from toxic diesel particulate emissions. These facilities and vehicles are not subject to SJVAPCD permit and so may need mitigation measures adopted by the Lead Agency to reduce this impact. Measures such as limiting idling, electrifying truck stops to power truck auxiliary equipment, use of diesel particulate filters, and use of alternative fuel heavy-duty trucks have been required by some jurisdictions.

6.7 MITIGATING ODOR IMPACTS

Appendix G (Environmental Checklist Form) of the state CEQA Guidelines specifies that the Lead Agency determines whether a project would “create of objectionable odors affecting a substantial number of people.”

Projects that have a significant odor impact because they place sources of odors and members of the public near each other should establish a buffer zone to reduce odor impacts to a less than significant level. The dimensions of the buffer zone must ensure that the encroaching project does not expose the public to nuisance levels of odorous emissions.

In establishing the appropriate dimensions of the buffer zone, the Lead Agency should consider actions currently being taken at the facility to control odors, as well as any future actions to which the facility is firmly committed. A safety margin also should be considered in establishing a buffer zone to allow for future expansion of operations at the source of the odors.

In order to reduce the dimensions of the buffer zone, add-on control devices (e.g. filters or incinerators) and/or process modifications implemented at the source of the odors may be feasible, depending on the specific nature of the facility. Lead Agencies should consult the SJVAPCD's Compliance Division for further information regarding add-on controls and process modifications to control odors. Odor mitigation measures that are targeted at the *receptors* (e.g. residential areas) that rely on sealing buildings, filtering air, or disclosure statements are not appropriate mitigation measures to be used in place of buffer zones or technical controls.

6.8 MITIGATION MONITORING AND REPORTING

CEQA requires that when a public agency makes findings that changes or alterations have been incorporated into the project which mitigate or avoid the significant effects identified in an EIR, or an MND, the agency must also adopt a program for reporting and monitoring mitigation measures that were adopted or made conditions of project approval[81]. This requirement is intended to assure that mitigation measures included in a certified EIR or MND are indeed implemented. Monitoring for the measures recommended in this document is best accomplished by the agency with land use approval. A Mitigation Monitoring and Reporting Program should include the following components:

- a description of each mitigation measure adopted by the Lead Agency;
- the party responsible for implementing each mitigation measure;
- a schedule for the implementation of each mitigation measure;
- the agency or entity responsible for monitoring mitigation measure implementation;
- criteria for assessing whether each measure has been implemented;
- enforcement mechanism(s).

Most of the mitigation measures described in this section are implemented during project construction. Monitoring of these measures is typically accomplished as conditions of approval of the subdivision map or site plan. On site measures, such as street trees and high efficiency heating and cooling systems are verified during building inspection prior to

[81] PRC §21081.6

occupancy. Off-site measures or contributions to city/county operated air quality mitigation fee programs may require the applicant to prove completion prior to issuing building permits.

APPENDIX A – GLOSSARY AND ACRONYMS

Air Basin - An area of the state designated by the ARB pursuant to Subdivision (a) of Section 39606 of the CH&SC.

Air Monitoring - The periodic or continuous sampling and analysis of air pollutants in ambient air or from individual pollutant sources.

Air Pollutants - Substances that are foreign to the atmosphere or are present in the natural atmosphere to the extent that they may result in adverse effects on humans, animals, vegetation, and/or materials.

Air Pollution Control Officer (APCO) - The executive officer of the District appointed by the Governing Board. The APCO is the approving authority for permits issued by the District, and therefore is the decision-making body for CEQA purposes for these approvals.

Alternative Fuels - Fuels such as methanol, ethanol, natural gas, and liquid petroleum gas that are cleaner burning and contribute to the attainment of ARB's emission standards.

Ambient Air - Air occurring at a particular time and place outside of structures. Often used interchangeably with outdoor air.

Anthropogenic - Relating to or influenced by the impact of man on nature.

APCD (Air Pollution Control District) - A county agency with authority to regulate stationary sources of air pollution (such as refineries, manufacturing facilities, and power plants) within a given county, and governed by a District Air Pollution Control Board composed of the elected county supervisors. (Compare AQMD and Unified District)

AQAP (Air Quality Attainment Plan) - A plan prepared by a APCD/AQMD designated as a nonattainment area, to comply with the California Clean Air Act for purpose of meeting the requirements of the California Ambient Air Quality Standards.

AQMD (Air Quality Management District) - A group of counties or portions of counties with authority to regulate stationary sources of air pollution within the region and governed by a regional air pollution control board comprised mostly of elected officials from within the region. An AQMD is established by state legislation. (Compare APCD and Unified District)

ARB (California Air Resources Board) - California's lead air quality agency consisting of an eleven-member Governor-appointed board fully responsible for motor vehicle pollution control, and having oversight authority over California's air pollution management program.

Area Sources - Also known as "area-wide" sources, these include multiple stationary emission sources such as water heaters, gas furnaces, fireplaces, and wood stoves that are individually small but can be significant when combined in vast numbers. The CCAA requires districts to include these area sources in the AQMPs.

Attainment - Achieving and maintaining the ambient air quality standards (both state and federal) for a given standard.

Attainment Area - An area that is in compliance with the National and/or California Ambient Air Quality Standards.

CAAQS (California Ambient Air Quality Standards) - Specified concentrations and durations of air pollutants, recommended by the California Department of Health Services and adopted into regulation by the Air Resources Board, which relate the intensity and composition of air pollution to undesirable effects. CAAQS are the standard that must be met per the requirements of the California Clean Air Act.

CALINE4 - CAlifornia LINE Source Dispersion Model, is the standard modeling program used by Caltrans to assess air quality impacts near transportation facilities, in the rare cases when the screening procedures of the CO Protocol fail. It is based on the Gaussian diffusion equation and employs a mixing zone concept to characterize pollutant dispersion over the roadway.

CCAA (California Clean Air Act) - A California law passed in 1988 that provides the basis for air quality planning and regulation independent of federal regulations, and which establishes new authority for attaining and maintaining California's air quality standards by the earliest practicable date. A major element of the Act is the requirement that local APCDs/AQMDs in violation of the CAAQS must prepare attainment plans that identify air quality problems, causes, trends, and actions to be taken for attainment.

CEQA (California Environmental Quality Act) - A state law intended to protect the environment of California. It is codified in Sections 21000 through 21177 of the Public Resources Code. CEQA establishes mandatory ways by which governmental (public agency) decision-makers are informed about the potential significant environmental effects of proposed projects. CEQA also mandates the identification of ways to avoid or significantly reduce damage to the environment. After preliminary review or the completion of an Initial Study, the Lead Agency may decide to prepare an Environmental Impact Report (EIR) for a project. An EIR is an informational document used to inform public agency decision-makers and the public of the significant effects of a project. The EIR also identifies possible ways

to eliminate or minimize the significant effects and describes reasonable alternatives to the project. A recent court decision has determined that both alternatives and mitigation measures must be discussed in the EIR.

CEQA Guidelines - Regulations prepared for the State Secretary for Resources to be followed by all state and local agencies in California in the implementation of CEQA, beginning at Sec. 15000, California Code of Regulations.

CEQA Statutes - California Environmental Quality Act, as amended, beginning at Section 21000 of the Public Resources Code.

CH&SC - California Health and Safety Code. Division 26 of the CH&SC was enacted by legislature in order that the public interest is "safeguarded by an intensive, coordinated state, regional, and local effort to protect and enhance the ambient air quality of the state[82]".

CO (Carbon Monoxide) - A colorless, odorless gas resulting from the incomplete combustion of fossil fuels. Over 80% of the CO emitted in urban areas is contributed by motor vehicles. CO interferes with the blood's ability to carry oxygen to the body's tissues and results in numerous adverse health effects. CO is a criteria air pollutant.

CO Protocol (Transportation Project-Level Carbon Monoxide Protocol) – A protocol developed by UC Davis in December 1997 that deals the with project-level air quality analysis needed for federal conformity determinations, NEPA, and CEQA. The Protocol is the standard method for project-level air quality analysis by Caltrans.

Concentration - The amount of an air pollutant present in a unit sample, usually measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

Criteria Air Pollutant - An air pollutant for which acceptable levels of exposure can be determined and for which a federal or state Ambient Air Quality Standard has been set. Examples include: ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM-10 (see individual pollutant definitions).

District - The San Joaquin Valley Air Pollution Control District is a unified air pollution control district as defined by the Health and Safety Code Section 40150. The District is comprised of the counties of San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and the San Joaquin Valley portion of Kern County. *See also SJVAPCD.*

DTIM - Direct Travel Impact Model - A model developed by Caltrans in the late 1970's and is used in the State of California to calculate amounts of air pollutant emitted from

[82] CH&SC §39001

motor vehicles and fuel consumption. The DTIM analysis is based on travel data produced by the Regional Transportation Model and on emission factors from the EMFAC Model.

EIR - Environmental Impact Report is a detailed statement prepared under CEQA describing and analyzing the significant effects of a project and discussing ways to mitigate or avoid the effects[83].

EIS - Environmental Impact Statement is an environmental impact document prepared pursuant to the National Environmental Policy Act (NEPA). NEPA applies to projects carried out, financed, or approved by federal agencies[84].

Emissions Inventory - An estimate of the quantity of pollutants emitted into the atmosphere over a specific period such as a day or a year. Considerations that go into the inventory include type and location of sources, the processes involved, and the level of activity.

EMFAC - An ARB program that is the source of emissions factors for most California motor vehicle emissions models.

Emission Standard - the maximum amount of a pollutant that is permitted to be discharged from a polluting source such as an automobile or smoke stack.

EPA (US Environmental Protection Agency) - the federal agency charged with setting policy and guidelines, and carrying out legal mandates for the protection of national interests in environmental resources.

EPA-Certified Wood Stoves – The EPA has promulgated New Source Performance Standards for wood heaters, which establish threshold particulate emission rates for wood heaters to be certified. Since 1992, only certified wood heaters can be sold in the United States. Certified wood stoves must be labeled according to procedures specified by the EPA. Wood stoves, cordwood fireplace inserts, and some pellet stoves/inserts must pass through the EPA certification process. Fireplaces themselves are exempt from EPA certification.

FCAA (Federal Clean Air Act) - Federal law passed in 1970 and amended in 1977 and 1990 that sets primary and secondary National Ambient Air Quality Standards for major air pollutants and thus forms the basis for the national air pollution control effort.

Fireplaces (open hearth) – Fireplaces are used primarily for aesthetic effects and secondarily for supplemental heating. Wood is the most common fuel for fireplaces. Conventional fireplaces are either manufactured metal (referred to as

[83] CCR §15362
[84] CCR §15220

zero-clearance or factory-built fireplaces) or masonry (generally brick and/or stone, assembled on site, and integral to a structure) design. Both have large fixed openings to the fire bed (sometimes called "open-hearth"). Fireplaces usually heat a room by radiation, and are considered inefficient heating devices with a significant fraction of the combustion heat lost in the exhaust gases and through fireplace walls. Inserts can be used to increase the heating potential and decrease emissions *(see Fireplace Inserts)*

Fireplace Inserts – Open-hearth fireplaces have large fixed openings to the fire bed. EPA-certified and pellet wood stoves can be designed as inserts to be installed into existing fireplace firebox/hearth cavities. If properly installed, their performance is similar to their stove counterparts. In addition, gas fireplace inserts can be installed directly into existing fireplaces, reducing the particulate emissions by almost 100%.

High occupant vehicle (HOV) lanes - the operation of reserving one or more lanes on a freeway for exclusive use of only vehicles with more than one occupant. Usually used in areas with heavy congestion to encourage carpooling.

Hydrocarbon - any of a large number of compounds containing various combinations of hydrogen and carbon atoms. They may be emitted into the air as a result of fossil fuel combustion and fuel volatilization, and are a major contributor to smog.

Indirect Source - facilities, buildings, structures, properties, and/or roads which, through their construction to operation indirectly contributes to air pollution. This includes projects and facilities that attract or generate mobile sources activity (autos and trucks) such as shopping centers, employment sites, schools, and housing developments, that result in the emissions of any regulated pollutant.

Mitigated Negative Declaration (MND) - A negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment [PRC §21064.5].

Mitigation - Measures taken to avoid or reduce a significant effect including:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

- Compensating for the impact by replacing or providing substitute resources or environments [CCR §15370].

NAAQS (National Ambient Air Quality Standards) - are standards set by the USEPA for the maximum levels of air pollutants that can exist in the ambient air without unacceptable effects on human health or the public welfare.

Natural Gas Fireplaces – Natural gas fireplaces are designed for new construction and can be either decorative gas fireplaces or gas fireplace heaters. Both produce practically no particulate emissions. Gas fireplace heaters are more sophisticated than decorative gas fireplaces, as they are designed for efficiency whereas decorative gas fireplaces are designed more for flame presentation aesthetics. Existing fireplaces can be converted to natural gas also by installing a gas fireplace insert *(see Fireplace Inserts).*

NSR (New Source Review) - the mechanism to assure that new and modified stationary sources will not interfere with the attainment or maintenance of any ambient air quality standard, or prevent reasonable further progress towards the attainment or maintenance of any ambient air quality standard. A program used in a nonattainment area to permit or site new permit or site new industrial facilities or modifications to existing industrial facilities that emit nonattainment criteria air pollutants. The two major requirements of NSR are Best Available Control Technology and Offsets.

Negative Declaration - A written statement briefly describing the reasons that a proposed project will not have a significant effect on the environment and does not require the preparation of an environmental impact report [PRC §21064].

Nonattainment Area - an area identified by the EPA and/or ARB as not meeting either NAAQS or CAAQS standards for a given pollutant.

Ozone - a pungent, pale, blue, reactive toxic gas consisting of three oxygen atoms. It is a product of the photochemical process involving the sun's energy. Ozone exists in the ozone layer as well as at the earth's surface. Ozone at the earth's surface causes numerous adverse health effects and is a criteria air pollutant. It is a major component of smog.

Ozone Precursors - compounds such as hydrocarbons and oxides of nitrogen, occurring either naturally or as a result of human activities, which contribute to the formation of ozone, the principal component of smog.

Pedestrian Oriented Development (POD) - any of a number of design strategies that emphasize pedestrian access over automobile access. They typically provide pedestrian amenities such as sidewalks, street trees, commercial at street frontage, safe street crossings, etc.

Pellet Stoves – Pellet stoves and pellet-stove inserts are fueled with pellets of sawdust, wood products, or other biomass materials pressed into manageable shapes and sizes. These stoves have active air flow systems and unique grate design to accommodate this type of fuel. Other than natural gas fireplaces and inserts, the pellet stove/insert is the most thermally, and emissions, efficient of all residential wood heating apparatus.

PM-10 (Respirable Particulate Matter) - a major air pollutant consisting of solid or liquid matter such as soot, dust, aerosols, fumes and mists less than 10 microns in size (one micron = 1/1,000,000 meter = 0.00003937 inch). PM-10 causes visibility reduction and adverse health effects, and is a criteria air pollutant.

Project - An activity that may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following:

- An activity directly undertaken by a public agency.
- An activity undertaken by a person that is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies [PRC §21065].

ROG (Reactive Organic Gas) - hydrocarbon compounds which are reactive and may contribute to the formation of smog. Also sometimes referred to as non-methane organic compounds and VOCs.

SIP (State Implementation Plan) - a document prepared by each state describing existing air quality conditions and measures that will be taken to attain and maintain National Ambient Air Quality Standards. In California, districts prepare nonattainment area plans to be included in the state's SIP.

Significant Effect on the Environment - A phrase used to indicate that an environmental effect of a project is at a level requiring the detailed analysis of an EIR and that the effect is severe enough to consider disapproving or changing the project to avoid the effect. The terms "significant effect" and "significant impact" are interchangeable under CEQA [CCR §15382].

State CEQA Guidelines - See CEQA Guidelines

Transit Oriented Development (TOD) - mixed use neighborhoods, up to 160 acres in size, which are developed around a transit stop and core commercial area. The entire TOD must be within an average of 2,000-foot walking distance of a transit stop. Secondary areas of lower density housing, schools, parks, and commercial and employment uses surround TODs for up to one mile.

Unified District - two or more contiguous counties may merge their county districts into one unified district. A unified district is formed by action of the member counties. The San Joaquin Valley Air Pollution Control District is a Unified District. *(See also APCD and AQMD)*

URBEMIS 7G for Windows - URBEMIS is a computer program that can be used to estimate emissions associated with land use development projects in California, such as residential neighborhoods, shopping centers, office buildings, etc. URBEMIS stands for "URBan EMISsions Model." URBEMIS 7G for Windows, Version 5.1.0 is the latest version. It is written specifically to run in the Windows 95/98 environment.

Volatile Organic Compounds (VOCs) - any organic compound containing at least one carbon atom except for specific exempt compounds found to be non-photochemically reactive. In this document, VOC is synonymous with ROG.

Wood Stoves – Wood stoves are enclosed wood heaters that control burning or burn time by restricting the amount of air that can be used for combustion. They are commonly used in residences as space heaters. Conventional wood stoves do not have any emission reduction technology or design feature and, in most cases, were manufactured before July 1, 1986. Current sales of wood stoves must be certified to 1990 EPA emission standards and will include either catalytic or noncatalytic emission reduction technology.

Acronyms

ADT - average daily trips
AQAP - Air Quality Attainment Plan
AQGGP - Air Quality Guidelines for General Plans
ARB - Air Resources Board (also CARB)
CAAQS - California Ambient Air Quality Standard
CAL - Cursory Analysis Level
CCAA - California Clean Air Act
CCR - California Code of Regulations
CEQA - California Environmental Quality Act
CFC - chlorofluorocarbons
CFR - Code of Federal Regulations
CH&SC – California Health and Safety Code
CO - carbon monoxide
DAQ - Designs for Air Quality
DTIM - Direct Travel Impact Model
EIR - Environmental Impact Report
EPA - United States Environmental Protection Agency
FAL - Full Analysis Level
FCAA - Federal Clean Air Act
FCAAA - Federal Clean Air Act Amendments of 1990
FIP - Federal Implementation Plan
GAMAQI - Guide for Assessing and Mitigating Air Quality Impacts
HAP - hazardous air pollutant
ISR - indirect source review
ITE - Institution of Transportation Engineers
LOS - level of service
MEI - Maximally Exposed Individual
MND - Mitigated Negative Declaration
NAAQS - National Ambient Air Quality Standard
NEPA - National Environmental Policy Act

NESHAP - National Emission Standards for Hazardous Air Pollutants
NOx - oxides of nitrogen
NOP - Notice of Preparation
PM-10 - respirable particulate matter of 10 microns in diameter or less
PRC - Public Resources Code
ROG - reactive organic gases
SJV - San Joaquin Valley
SJVAB - San Joaquin Valley Air Basin
SJVAPCD- San Joaquin Valley Air Pollution Control District
SOx - oxides of sulfur
SPAL - Small Projects Analysis Level
TCM - transportation control measures
USEPA - United States Environmental Protection Agency
VMT - vehicle miles traveled
VOC volatile organic compounds *(see ROG)*

APPENDIX B – SJVAPCD POINT OF CONTACT LIST

Northern Region Office– Modesto (209) 557-6400
4230 Kiernan Ave., Suite 130 FAX (209) 557-6475
Modesto, CA 95356

Central Region Office – Fresno (559) 230-6000
1990 E. Gettysburg Avenue FAX (559) 230-6061
Fresno, CA 93726

Southern Region Office – Bakersfield (661) 326-6900
2700 "M" St., Suite 275 FAX (661) 326-6975
Bakersfield, CA 93301

District website – http://www.valleyair.org

PLANNING DIVISION

Air Quality Elements/General Plan (559) 230-5800

CEQA Commenting/Impact Assessment
– Northern Region *(Merced, Stanislaus, and San Joaquin Counties)* (209) 557-6470
– Central Region *(Fresno and Madera Counties)* (559) 230-5800
– Southern Region *(Tulare and **Kings** County and a portion of Kern County)* (661) 326-6980

Public Information/Education (559) 230-5850

PERMIT SERVICES DIVISION

Small Business Assistance
– Northern Region *(Merced, Stanislaus, and San Joaquin Counties)* (209) 557-6446
– Central Region *(Fresno, **Kings**, and Madera Counties)* (559) 230-5888
– Southern Region *(Tulare County and a portion of Kern County)* (661) 326-6969

Air Toxics/Hazardous Air Pollutants (559) 230-5900

COMPLIANCE DIVISION

Regulation VIII - Fugitive Dust Control (559) 230-5950

Asbestos Coordinator
– Northern Region *(Merced, Stanislaus, and San Joaquin Counties)* (209) 557-6400
– Central Region *(Fresno, **Kings**, and Madera Counties)* (559) 230-5950
– Southern Region *(Tulare County and a portion of Kern County)* (661) 326-6900

EXHIBIT H

IV. POLICY ANALYSIS AND AIR QUALITY BENEFITS

Introduction

No later than one year after the first housing revisions to take place after January 1, 2004, cities and counties in the San Joaquin Valley Air Basin are required to amend their general plans to include goals, policies, and feasible implementation strategies to improve air quality, and these amendments should be submitted to the District at least 45 days prior to the adoption of those amendments (California Government Code Section 65302.1). The District has 30 days to return comments and advice. Cities and counties are encouraged to use the ideas presented in this section to develop their own goals and policies in their general plan amendments. Goals and policies in this section have direct and indirect air quality benefits, and they address a very broad range of planning and air quality issues facing the San Joaquin Valley. The list of goals and policies is extensive, but it is not intended to cover all possible policy solutions to air quality problems. The policy language is in no way mandatory. Cities and counties are encouraged to use the ideas presented here to develop their own goals and policies in their general plans.

This section is divided into three components. The first component consists of goals and policies suitable for use in separate air quality elements, chapters, or sections of the general plan. The second component contains goals and policies for use primarily in land use elements. The third component provides goals and policies that may be used in circulation elements. Goals and policies from the last two components could be used in a separate air quality element, but cities and counties should be alert for potential inconsistencies with existing land use and circulation elements.

Section Format

- Suggested Goals and Policies for Separate Air Quality Elements, Chapters, or Sections
- Suggested Goals and Policies for Land Use Elements
- Suggested Goals and Policies for Circulation Elements

The supporting information for the goals and policies is provided under four headings: Implementation Strategies, Air Quality Benefits, Programs in Operation, and Resources. A description of each of these areas is provided below.

Implementation strategies provide guidance and ideas for implementing the goals and policies presented in the Air Quality Guidelines. They are intended to clarify the intent of the specific policy and in some cases provide specific implementation examples.

Format for Goals and Policies Sections	
• **Issues**	**Statement of the problem to be addressed**
• **Goals**	**Overall outcome desired**
• **Objectives**	**Specific outcome desired**
• **Policies**	**Statement of direction or commitment to take action**
• **Implementation Strategies**	**Action ideas to carry out policies**
• **Air Quality Benefits**	**Benefits in terms of trip reduction or emissions reduction**
• **Programs in Operation**	**Examples of existing programs implementing the policies**
• **Resources**	**Where to go for more information**

The Air Quality Benefits sections provide the rationale for the goals and policies. Where available, reductions in air pollutant emissions or vehicle use that may be achieved by implementing the policies are provided. In many cases, groups of policies are part of the same strategy such as transit/pedestrian-oriented design. For those policies, specific reductions are provided for the policy promoting the adoption of the strategy. The policies that support or enhance the strategy refer back to the strategy policy. It should be noted, however, that a complete foundation for every policy on the basis of existing information is not possible at this time. For these policies, an explanation of the theory behind the proposed measure is provided. The information included under Air Quality Benefits has been assembled from a review of existing technical reports, studies, surveys and data published by various public agencies and private researchers. No original studies were conducted for this report.

The last two sections provide examples and resources that planners can draw on when developing an air quality program. The Programs in Operation sections provide examples where similar programs or policies have been

adopted or implemented. The Resource sections provide references where more detailed information may be obtained and provide points of contact at agencies that have adopted similar programs.

Immediately following the goals and policies is a section describing the overall air quality benefits possible with adoption and aggressive implementation of air quality policies in the general plan. It provides a brief description of the results of research on the effect of land use patterns on motor vehicle use. Also provided is an estimate of "before AQE implementation" and "after AQE implementation" emissions inventories for one Valley county. This information is provided as a tool to aid local jurisdictions in illustrating the potential benefits of adopting an air quality element.

The Air Quality Guidelines should be viewed as a flexible resource upon which to justify and implement air quality goals and policies. The District will periodically update the Guidelines as new information and control technologies emerge. It is the District's belief, however, that the information, materials, and tools contained in the Guidelines provide sufficient grounds to encourage the adoption of appropriate air quality goals and policies that can help a city or county meet the air quality requirements of AB 170 and California Government Code Section 65302.1.

Groups of policies include lists of additional resources that may be useful in developing and implementing land use policies. One resource that applies generally to all the policies in this section is the EPA's 2001 document, *Improving Air Quality Through Land Use Activities*, available at <http://www.epa.gov/otaq/transp/trancont/r01001.pdf>. This guidance describes links between EPA policies and land use activities that encourage travel patterns and choices that reduce vehicle miles of travel and, consequently, reduce emissions from motor vehicles in communities. Five characteristics of urban form that influence travel and air quality are summarized below. Another general resource is the ARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which was adopted in April 2005 and is available online at <http://www.arb.ca.gov/ch/aqhandbook.htm>. In this guidance document, ARB recommends siting distances between sources of pollution, like high traffic area and refineries, and sensitive land uses based on data showing that the localized air pollution exposures can be reduced by as much as 80% with the recommended separation.

Appendix A provides a separate list of each goal, objective, and policy without the implementation strategies and air quality benefits. This appendix is intended for those wishing to view or to use only the air quality goals and policies.

SUGGESTED GOALS AND POLICIES FOR SEPARATE AIR QUALITY ELEMENTS, CHAPTERS, OR SECTIONS

The goals and policies in this section are those most appropriate to include in a separate air quality element, chapter, or section. These are air quality specific policies that most cities or counties can use without major modifications to their existing general plan elements.

Principles for Air Quality Elements, Chapters, or Sections

The Air District strongly encourages cities and counties of the San Joaquin Valley to:

- Determine air quality impacts of development proposed in their jurisdiction and mitigate those impacts to the maximum extent feasible
- Cooperate with the District, neighboring jurisdictions, and other agencies to reduce air quality impacts
- Ensure that land use and transportation plans are fully integrated and consider air quality
- Work to educate the public on land use, transportation, and air quality issues
- Implement air quality programs for public facilities and operations that are a model for the private sector
- Develop programs and take actions to implement Transportation Control Measures
- Plan land uses to avoid industrial/residential air pollution conflicts
- Reduce PM10 emissions from sources under their jurisdiction or control
- Develop programs to reduce emissions from residential and commercial area sources such as woodburning, energy use, and other and equipment use

COMMUNICATION, COOPERATION, AND COORDINATION

Issue:

Air pollution is a complex problem. All levels of government are responsible for solving some portion of the problem. Often, the responsibilities of one level of government overlap with another. In order to develop effective programs and reduce pollution emissions, effective communication, cooperation, and coordination are vital.

Goal 1: **Effective communication, cooperation, and coordination in developing and operating community and regional air quality programs.**

ENVIRONMENTAL ASSESSMENT

Issue:

The environmental assessment process required under the California Environmental Quality Act (CEQA) is by far the most important tool for local government to communicate with other agencies and the public on the air quality impacts of development within a community. Strong and consistent application of CEQA can make a significant difference in project level air quality impacts.

Objective 1a To accurately determine and fairly mitigate the local and regional air quality impacts of projects proposed in this City/County.

Policy 1 The City/County of _____ shall determine project air quality impacts using analysis methods and significance thresholds recommended by the District.

Note: The District has prepared guidelines that provide standard criteria for determining significant environmental effects, that provide a uniform method of calculating project emissions, and that will provide standard mitigation measures to reduce air quality impacts. The District now has adopted thresholds of significance and recommends analysis methods described in the District guidance manual, Guide for Assessing and Mitigating Air Quality Impacts*.*

Projects analyzed in sufficient detail to determine air quality impacts in an EIR (Environmental Impact Report) or negative declaration could be exempt from further analysis during subsequent discretionary approvals such as zone changes or subdivision maps. For projects where insufficient details were known at the time the EIR was prepared, the analysis should be focused on specific impacts not previously addressed.

Implementation Strategy:

Ensure that development projects are submitted to the District for CEQA comments and review of air quality analysis.

Train staff planners preparing CEQA documents on how to use the Guide for Assessing and Mitigating Air Quality Impacts *guidance manual.*

Policy 2 The City/County of _____ shall ensure that air quality impacts identified during CEQA review are consistently and fairly mitigated.

Implementation Strategy:

Require projects to comply with appropriate mitigation measures recommended by the District and described in its Guide for Assessing and Mitigating Air Quality Impacts *guidance manual or with alternative mitigation measures proposed by the applicant and approved by the District.*

Policy 3 The City/County of _____ shall ensure all air quality mitigation measures are feasible, implementable, and cost effective.

Implementation Strategy:

Consult with the District regarding the effectiveness of mitigation measures proposed by the applicant. When using measures from the District list of suggested measures, consider site-specific factors that that may make a measure infeasible.

Policy 4 The City/County of _____ shall identify the cumulative transportation and air quality impacts of all general plan amendments approved during the previous year.

Note: This may be in form of the Annual General Plan Status Report recommended by the Governor's Office of Planning and Research in the General Plan Guidelines. This information will assist the District in predicting long term indirect source impacts and could also be used in the mandatory report required by the Congestion Management Program.

Implementation Strategy:

Develop a system that tracks changes in land use by traffic analysis zone. Work with the District to perform air emissions modeling on the cumulative land use changes.

Policy 5 The City/County of _____ shall reduce the air quality impacts of development projects that may be insignificant by themselves, but cumulatively are significant.

Implementation Strategy:

Small residential and commercial projects usually do not cause significant air quality impacts, but when a number of small, unrelated projects are developed in an area, they produce a cumulative impact. These impacts may be addressed in specific plans that set development standards and require mitigation for the plan area. They may also be addressed by local ordinances that institutionalize mitigation measures, making them applicable to all projects regardless of size.

Policy 6 The City/County of _____ shall encourage innovative mitigation measures to reduce air quality impacts by coordinating with the District, project applicants, and other interested parties.

Implementation Strategy:

Innovative measures can be identified during a pre-application consultation process and during city/county staff/applicant negotiation over CEQA mitigation.

Air Quality Benefits:

The policies in this section address the requirements of CEQA to identify and reduce the environmental impacts of development projects. By implementing these policies, cities and counties will be fulfilling their responsibilities for determining short term and long-term air quality impacts and for using all feasible measures to reduce those impacts. Reducing air quality impacts means finding ways for projects to cause less pollutant emissions, and that is the primary goal of the Air Quality Guidelines.

CEQA allows each jurisdiction to determine within certain guidelines what is a "significant environmental effect" and what is "feasible mitigation." This has led to situations where one jurisdiction requires an EIR and substantial mitigation while a neighboring jurisdiction requires limited environmental review and limited mitigation for a similar project. If all jurisdictions implement Policies 1 and 2, it would create a level playing field for jurisdictions throughout the San Joaquin Valley. Air quality issues created locally have a regional effect, and air pollution does not respect political boundaries. Policies 1 and 2 would ensure that all projects would be subject to the same air quality analysis requirements and would mitigate project emissions to the

same extent. By raising all projects to the same high standard, it would ensure that jurisdictions within the region are not using less-stringent standards. Where jurisdictions are using less-stringent standards, there is the potential to emit more pollutants due to their lax standards. Consequently, fewer pollutants would be emitted when all projects use the same high standards.

The purpose of Policy 3 is to ensure that all mitigation measures are appropriate. To do this, the lead agency must consider the individual circumstances of each project site when requiring mitigation. An example of an inappropriate mitigation measure would be one requiring a bus shelter for a project not on an existing or planned bus route. The primary benefits of this policy are economic. Resources wasted on ineffective mitigation measures are resources lost for use on measures that are effective in reducing emissions.

Air pollution is a regional problem that is affected by the cumulative land use decisions of every city and county in the San Joaquin Valley. Policy 4 would enable a local jurisdiction to more accurately predict the cumulative air quality impacts of general plan build out, and would allow the District to predict impacts for the entire Valley. This information is vital for determining the emission reductions that will be needed to attain state and federal air quality standards.

Policy 5 is intended to encourage cities and counties to mitigate emissions from small sources that are minor when looked at in isolation, but become large when examined cumulatively. It is usually easier to mitigate emissions from larger projects because of economies of scale; however, small projects can provide on-site measures that will encourage people to use alternatives to motor vehicles and to reduce area-wide source emissions. The implementation of mitigation measures through local or county ordinances would require that mitigation measures be implemented regardless of whether the project contributes insignificant air quality impacts. This would ensure that all mitigation is applied to all projects regardless of project size and minimizes air quality impacts.

Policy 6 recognizes that the person or business affected by a mitigation measure is often best at identifying the most cost effective solutions. By allowing the developer to propose new and innovative solutions, you tap creativity driven by the developer's economic self-interest. Further, soliciting the input of interested parties will help to create a dialogue between all parties and identify mitigation measures that may have been overlooked. Once new mitigation measures are proven, their use throughout the air basin will improve air quality and reduce compliance costs.

Programs in Operation:

Numerous air districts within the state have developed environmental guidance manuals that provide guidance in the determination of significance of air quality impacts, establish emissions thresholds for project review, and set project analysis requirements to comply with CEQA. Examples of air districts that have environmental guidance manuals include the Bay Area Air Quality Management District (BAAQMD), Sacramento Metropolitan Air Quality Management District (SMAQMD), and the South Coast Air Quality Management District (SCAQMD).

The District has implemented an enhanced CEQA review program. The District has assigned staff to comment on discretionary development projects with the potential for significant adverse air quality impacts submitted by cities and counties. They have developed a list of suggested air quality measures for use by lead agencies. The District adopted the *Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI)* guidance manual on August 20, 1998 and has undergone subsequent revisions. The document provides guidance for addressing air quality in environmental documents within the District. District staff also reviews air quality analyses for accuracy.

Resources:

District maintains CEQA staff at to comment on environmental documents and to answer air quality questions. The phone number is (559) 230-5800.

The District's *Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI*) provides guidance to local government, project applicants, and consultants in analyzing air quality impacts of development projects and in meeting the requirements of the CEQA review process. Guidance in determining significance of air quality impacts, emissions thresholds for project review, project analysis requirements to comply with CEQA, and recommended mitigation measures to help minimize air quality impacts are included within the *GAMAQI*. The *GAMAQI* is available from the District at (559) 230-5800 and <www.valleyair.org/transportation/ceqa_guidance_documents.htm>.

COORDINATION/COOPERATION

Issue:

Coordination and cooperation are embraced by all, but we seldom achieve effective coordination and cooperation in government programs. Competitive and adversarial relationships common between many cities and counties and with outside agencies have proven counterproductive. Working together for a

common interest can multiply the resources available to accomplish air quality goals.

Objective 1b To coordinate local air quality programs with regional programs and those of neighboring jurisdictions.

Policy 7 The City/County of _____ shall work with neighboring jurisdictions and affected agencies to address cross-jurisdictional and regional transportation and air quality issues.

Note: The term neighboring jurisdiction generally refers to the county or to cities sharing a sphere of influence boundary. The extent of regional impact and consultation depends on the scope of the project.

Implementation Strategies:

Create an environment that allows and encourages staff members to keep up with activities in neighboring jurisdictions and regional agencies. This may be accomplished by sending representatives to appropriate meetings, by contacting counterparts in other agencies when developing programs, and, most importantly, by active participation in regional programs.

Planning agencies should develop internal procedures to ensure that all affected jurisdictions and agencies are notified of development proposals in accordance with state law. When another agency notifies your agency of a pending project, you should be examining air quality related issues, such as the following:

- *Congestion on roads in your jurisdiction from increased traffic caused by the project*
- *Effects on the viability of transit and pedestrian-oriented developments in your area (i.e., approval of a low density development on the same transit corridor as your transit-oriented development could reduce the ability of the transit provider to provide reasonable headways)*
- *Failure of the other jurisdiction to require the construction of a segment of a bikeway planned in the regional bikeway plan*
- *Proposed circulation amendments that may restrict traffic flow to or from your jurisdiction or that increase urban sprawl*

- *Proposed project may preclude or minimize the effectiveness of transit and pedestrian-oriented development/programs*

Policy 8 The City/County of _____ shall consult with the District during CEQA review for discretionary projects with the potential for causing adverse air quality impacts.

Note: The District will meet with project proponents to conduct a pre-application review to discuss air quality review/mitigation requirements when requested.

Implementation Strategy:

Ensure that the District is on the distribution list for all CEQA documents.

Conduct a pre-application air quality review to identify issues or problems that might require redesigning or major alterations of the project. The District may also review formal air quality impact analyses submitted by the applicant for adequacy. This will ensure that the environmental document bases its conclusions on accurate information.

Policy 9 The City/County of _____ shall coordinate with other jurisdictions and other regional agencies in the San Joaquin Valley to establish parallel air quality programs and implementation measures (trip reduction ordinances, indirect source programs, etc.).

Implementation Strategy:

Work with the Councils of Governments on programs implementing transportation control measures to reduce vehicle trips (VT) and vehicle miles traveled (VMT).

Work with the County or neighboring cities and counties to ensure programs are complimentary.

Be involved in the rule development process. Provide representation on air quality steering and advisory committees.

Discussion: This policy seeks to promote a level playing field for all jurisdictions in the Valley. Also, large regional employers prefer uniform programs so compliance is the same at all employment sites.

Policy 10 The City/County of _____ shall work to reach an equitable tax sharing arrangement with the city/county to avoid the fiscalization of land use decisions.

Implementation Strategy:

Develop a joint powers agreement or other legal instrument to provide an incentive for counties to discourage urban commercial development in unincorporated areas and promote urban infill and redevelopment projects.

Policy 11 The City/County of _____ shall support investment in cost-effective multi-use modeling and geographic information system technology.

Implementation Strategies:

Join a GIS users group. Identify systems being developed by other agencies that coincide with your agencies needs and propose a joint venture. Participate in Valley-wide GIS projects.

Air Quality Benefits:

The policies included under Objective 1b recognize that air quality problems are both local and regional, and that that air pollution does not respect political boundaries. These policies highlight the need for cross-jurisdictional planning and environmental review of proposed developments to ensure that each jurisdiction has before it all materials necessary to make responsible planning decisions. Intercity/county coordination and cooperation of planning efforts will streamline the region-wide air quality improvement efforts of the District, as well as the regional efforts of other agencies that may indirectly affect air quality in the Valley.

Policies 7 through 9 provide a general framework encouraging coordination between jurisdictions within the region and between the jurisdictions and the District. Coordination between the regional jurisdictions and the District will ensure all are working toward the same goal of minimizing air quality impacts and that the actions of one jurisdiction does not negatively affect the air quality in another jurisdiction or negate the air quality benefits made by another jurisdiction.

Policy 10 provides a commitment for cities and counties to cooperate in developing tax-sharing arrangements to reduce the temptation of approving discontinuous commercial development in unincorporated areas. The loss of revenues from other sources due to Proposition 13, economic recessions,

and state funding cutbacks have led to extreme competition for sales tax dollars between cities and counties. This competition can lead to urban sprawl, increased vehicle miles traveled, and the inability to provide efficient transit service. By minimizing commercial development within unincorporated areas and promoting urban infill and redevelopment projects, VT and VMT are reduced. In addition, transit, pedestrian, and bike modes of transportation are more accessible and feasible in concentrated development projects, further reducing VT and VMT.

Adoption of Policy 11 would enable a systematic, jurisdiction-wide approach to determining the quantitative impacts of a particular land use, transportation, or air quality planning decision. Geographic Information Systems (GIS) facilitate a jurisdiction-wide approach and can serve as a clearinghouse on information regarding all proposed projects in the jurisdiction's sphere of influence.

GISs help accurately forecast potential impacts on public infrastructure and thereby avoid constructing excess capacity in roads, sewers and water systems. They can also ensure that new development projects contribute a fair amount to the cost of new infrastructure. Air quality benefits are derived from the enhanced ability to determine long-term air quality impacts of development and the appropriate mitigation to reduce impacts.

Cooperation and coordination reduce emissions by allowing air quality programs to be implemented more rapidly and by creating more effective programs. Air quality impacts that are identified during the project review process can be mitigated to reduce pollutant emissions.

Programs in Operation:

The District has staff available to meet with applicants, consultants, and city/county staff to discuss air quality analysis and mitigation requirements for CEQA documents. This can be at the pre-application phase or at any time during the CEQA process. Similar programs are in effect in most larger air districts, such as Ventura County, the Bay Area Air Quality Management District (BAAQMD), the Sacramento Metropolitan Air Quality Management District (SMAQMD), and the South Coast Air Quality Management District (SCAQMD).

Kern County and the City of Bakersfield jointly adopted a general plan for the Bakersfield Metropolitan Area. Procedures and memoranda of understanding were developed for joint adoption of general plan amendments and for plan implementation.

The Councils of Governments in the San Joaquin Valley have entered into a memorandum of understanding to implement valley-wide transportation control measures.

Jurisdictions throughout the nation are implementing GIS. As GIS hardware and software has become less expensive and easier to use, even small cities are finding that GIS is viable. Many jurisdictions and individual agencies are pursuing GIS in the Valley. Assessors Offices, Planning Departments, School Districts, Public Utilities, and others are developing systems or have systems in place. The San Joaquin Valley Geographic Information Systems Council and Interdisciplinary Spatial Information Systems Center provide GIS data for the Valley region.

Statewide, there are many resources available for GIS information. Data are available from the California GIS Council, California Bureau of Land Management, California Spatial Information Library, California Environmental Information Catalog, and the California Environmental Resources Evaluation System. Each of these resources are available online and provide links to other data sources.

Resources:

City of Bakersfield Consolidated Plan 2005, City of Bakersfield Department of Economic and Community Development, Planning Division. <http://www.ci.bakersfield.ca.us/edcd/library/ConPlan2005/toc.htm>.

South Coast Air Quality Management District (SCAQMD). Information on obtaining the CEQA Air Quality Handbook is available from the SCAQMD at <http://www.aqmd.gov/ceqa/hdbk.html>. The SCAQMD is developing the "Air Quality Analysis Guidance Handbook" to replace the CEQA Air Quality Handbook.

San Joaquin Valley Geographic Information Systems Council, <http://www.sjvgis.org>.

Interdisciplinary Spatial Information Systems Center, <http://www.isis.csufresno.edu>.

California GIS Council, <http://www.gis.ca.gov/council/index.epl>.

California Bureau of Land Management, <http://www.ca.blm.gov/gis>.

California Spatial Information Library, <http://www.gis.ca.gov/index.epl>.

California Environmental Information Catalog, <http://ceres.ca.gov >.

California Environmental Resources Evaluation System, <http://gis.ca.gov/catalog>.

INTEGRATED PLANNING

Issue:

In the past, transportation planning emphasized the construction of new roadway capacity to reduce congestion and to meet the needs of planned development. Air quality legislation now mandates all transportation plans to consider air quality. This new emphasis requires our land use and transportation plans to create patterns of development and transportation infrastructure that reduce the need for new capacity and improve air quality.

Objective 1c To integrate land use planning, transportation planning, and air quality planning to make the most efficient use of public resources and to create a healthier and more livable environment.

Policy 12 The City/County of _____ shall consider air quality when planning the land uses and transportation systems to accommodate the expected growth in this community.

Implementation Strategy:

Develop coordinated land use and transportation plans to meet federal, state, and local air quality requirements.

Ensure that land uses proposed in general plan updates and general plan amendments are supported by a multi-modal transportation system and that the land uses themselves support the development of the transportation system.

Policy 13 All City/County submittals of transportation improvement projects to be included in regional transportation plans (RTP, RTIP, CMP, etc.) shall be consistent with the air quality goals and policies of the General Plan.

Implementation Strategies:

Analyze project submittals for consistency. Examples of inconsistent projects are a road widening project that does not consider transit, bicycling, and pedestrian needs along the route or an intersection signalization project that does not involve the installation of signal actuators that can be activated by bicyclists or pedestrians.

Discussion: This policy attempts to tie the regional transportation planning process back to the general plan. The concept behind this policy is that projects funded by the RTIP and other processes have a profound impact on where development will take place and what its composition will be. The city or county should not assume that transportation facilities needed to support general plan build-out will be built unless they are included in the RTP.

Policy 14 The City/County of _____ shall consult with transit providers to determine project impacts on long range transit plans and ensure that impacts are mitigated.

Implementation Strategy:

Work with transit providers to develop long range transit plans based on land use plans supportive of future transit service.

Consult with transit providers during the CEQA process to determine the fiscal impacts of development projects on the transit system and develop funding sources to mitigate those impacts.

Policy 15 The City/County of _____ shall work with the Housing Authority, transit providers, and developers to encourage the construction of low income housing developments that use transit-oriented and pedestrian-oriented design principles.

Implementation Strategy:

Assign a lead agency to pursue grants for planning and constructing a low-income transit-oriented development. Community development departments are logical candidates for this task.

Potential funding sources for project design and construction are Federal Highway funds, transit funds, and housing program funds. Local government would primarily be involved in locating the best project site and in streamlining and assisting in the permit process.

Policy 16 The City/County of _____ shall work with Caltrans and the Regional Transportation Planning Agency to minimize

the air quality, mobility, and social impacts of large scale transportation projects on existing neighborhoods.

Implementation Strategies:

Use existing rail right of ways where feasible.

Provide safe pedestrian and bicycle connections between neighborhoods and shopping areas when they become separated by new rail or freeway projects.

Air Quality Benefits:

Policies in this section emphasize a commitment to truly integrate the transportation requirements planned in the Circulation Element and the land uses planned in the Land Use Element with air quality policies presented in this document. Integrated planning leads to transportation systems that support all modes of transportation and land use patterns that encourage the use of alternative modes. Effective implementation of a fully integrated plan can achieve trip reductions on the order of 10 to 23 percent (ARB 1993) and commensurate air quality benefits.

Projects such as those proposed by Policy 15 would allow people who can least afford car ownership with reasonable options to meet their mobility needs. Providing access to transit will increase employment options for low-income residents and could lead to the retirement of high emitting older vehicles. It is estimated that mixed-use and higher density strategies can achieve a 10 to 30 percent reduction in per-household vehicle travel and related emissions at the neighborhood or community level, while multi-modal transportation systems can reduce regional vehicle travel and associated emissions by 5 to 15 percent (ARB 1997). Further, a combination of TOD and high levels of transit service can increase the use of transit within a neighborhood by 20 to 40 percent (Caltrans 2002).

Policy 16 recognizes that major transportation projects can severely impact existing development. Measures to maintain neighborhood links can minimize increases in trips and vehicle miles traveled.

Programs in Operation:

The State of Oregon Land, Conservation, and Development Commission adopted a Transportation Planning Rule. This rule mandates local governments to consider air quality and mobility in land use decisions and requires local jurisdictions to adopt ordinances to make new development more bicycle, pedestrian, and transit friendly (SDAPCD 1998). The goal of the Transportation Planning Rule is to “promote the development of safe,

convenient and economic transportation systems that are designed to reduce reliance on the automobile so that the air pollution, traffic and other livability problems faced by urban areas in other parts of the country might be avoided…containing urban development; reducing the cost of public services; protecting farm and forest land; reducing air, water, and noise pollution; conserving energy, and reducing emissions of greenhouse gases that contribute to global climate change."

The San Diego Association of Governments has sponsored seminars and workshops, such as "Building Livable Communities," in coordination with cities and neighborhoods in the region. The League of Women Voters and the San Diego Section of the American Planning Association have held similar workshops on an occasional basis.

In 2002, Caltrans released the results of the "Statewide Transit-Oriented Development Study," which is available at <http://www.dot.ca.gov/hq/MassTrans/tod.htm>. The study defines, describes, and examines the implementation of transit-oriented development.

The Federal Highways administration (FHWA) funded Transportation, Community, and System Preservation (TCSP) project, "Creating Transportation Option in the San Joaquin Valley Through Improved Land Use Patterns," built on previous work of the Growth Alternatives Alliance. The project promoted principles of efficient land use in urban areas, livable communities emphasizing pedestrian and transit-oriented design, and protecting productive farmland. Accomplishments of the TCSP project include smart growth publications, Smart Growth Zoning Code and livable communities workshops held at many San Joaquin Valley locations.

EDUCATION

Issue:

Without the understanding and support of the general public, local air quality programs cannot be expected to achieve the desired results. Programs to educate the public on air quality issues are a vital component of a successful air quality program.

Objective 1d To educate the public on the impact of individual transportation, lifestyle, and land use decisions on air quality.

Policy 17 The City/County of _____ shall work to improve the public's understanding of the land use, transportation, and air quality link.

Implementation Strategy:

Planning agencies should assist in educating developers and the public on the benefits of pedestrian and transit friendly development and should participate in local programs that can reduce vehicle trips and miles traveled.

Methods of educating developers and the public on the benefits of pedestrian and transit friendly development include conducting public meetings, workshops, seminars, and providing consultation opportunities for developers. In addition, it is recommended that planning agencies, working with the ARB, District, and the local school districts, develop educational materials regarding air quality, the impact of air quality on people, plants, and animals, and measures that help to improve air quality. These materials would be presented within the curriculum of the local school districts.

Policy 18 The City/County of _____ shall encourage local public and private groups that provide air quality education programs.

Implementation Strategy:

Form a community-wide public/private air quality organization to promote education programs.

Work with the Farm Bureau, the University of California Extension Studies, and farm organizations on educational programs.

Air Quality Benefits:

Public education can be an effective tool for implementing air quality programs. More importantly, public education can lead to changes in travel behavior and mode choice decisions that reduce emissions and improve air quality.

The theory behind air quality public education programs is that if each individual is made aware of the air quality impacts of his/her activities, then that individual is more likely to choose the option that pollutes less. The Bay Area Air Quality Management District credits its high profile "Spare the Air" campaign with reducing NOx levels by 1.776 tons per day on “Spare the Air” days. In addition, the campaign has reduced ROG by 1.86 tons and PM10 by 0.4 tons (Globe Research & Analysis 2003).

Cities and counties can educate developers and the public on land use patterns and site designs that reduce motor vehicle trips and improve air quality. Planning agencies can provide developers, engineers, and designers with information that promotes transit, pedestrian, and bicycle friendly designs. Planning agencies can participate in the professional development programs of associations such as the California Council of Civil Engineers, the American Planning Association, and the Building Industry Association. By working directly with the people designing the projects, air quality design principles are more likely to be incorporated into the projects submitted to cities and counties.

Programs in Operation:

The District conducts extensive air quality public information programs in the Valley. The programs cover the Valley's air quality issues, the sources of pollution, and District air quality rules and regulations. They also focus on what individuals can do to improve air quality. The media used in outreach efforts include brochures (both English- and Spanish-language), news releases to Valley-wide media outlets, public service announcements on radio and television, a Clean Air Kids Calendar, a speakers bureau that is available to speak on an array of air pollution topics, and information on the District's website. The District has prepared brochures on specific rule implementation, such as residential woodburning and trip reduction, and has developed Spare the Air, a program designed to inform employers and the public about air quality in the Valley and how the public can help to improve it. The District places a special focus on youth education through the development of special materials and presentations aimed at students in grades K-12.

In April of 1998, the Growth Alternatives Alliance, a consortium made of the Fresno Business Council, American Farmland Trust, Fresno County Farm Bureau, Building Industry Association of the San Joaquin Valley, and Fresno Chamber of Commerce, published A Landscape of Choice: Strategies for Improving Patterns of Community Growth. The Alliance is committed to protecting vital natural resources, improving the quality of life, and supporting the growth of better communities within Fresno County.

Resources:

The District employs a Public Information staff to administer the District's public education program. District staff is available to assist cities and counties with starting their programs. The Public Information staff may be reached at (559) 230-5800 at the District's central office.

Spare the Air, the District's program to inform and educate the public regarding air quality and pollution prevention is available online at <http://www.valleyair.org/sta/staidx.htm>.

A Landscape of Choice: Strategies for Improving Patterns of Community Growth. Available from the American Farmland Trust, 1949 Fifth Street, Suite #101 Davis, CA 95616. Available online at <http://www.farmlandinfo.org>. A follow-up publication, Livable Neighborhood Development – Implementation Guideline to a Landscape of Choice, provides more specific strategies. Both are available from the Fresno Business Council at Fig Garden Financial Center, 5250 N. Palm, Suite 300, Fresno, CA 93704-2217. <http://www.fresnobc.org>.

Rideshare programs are operating throughout the Valley. These programs encourage all methods of reducing motor vehicle trips, not just ridesharing.

PUBLIC FACILITIES/OPERATIONS

Issues:

City and county governments are often the largest employers in a jurisdiction, and they often operate large vehicle fleets. Local governments should take a leadership role in implementing employer-based trip reduction and fleet operator programs to reduce their own emissions and to provide a model for the private sector.

Objective 1e For public facilities and operations to provide a model for the private sector in implementing air quality programs.

Policy 19 City/County Departments shall take the lead in implementing innovative employer-based trip reduction programs for their employees.

Implementation Strategy:

Ensure that employment contracts negotiated with unions are flexible and allow workers to participate in programs that reduce commute trips.

City/County Departments should work to encourage and implement trip reduction programs to reduce staff commute trips. Examples of trip reduction programs include:

- *Department-sponsored carpooling efforts and rideshare programs*
- *Reimbursement or subsidizing of transit costs for employees*
- *Incentives for employees who use alternative means of transportation (biking, walking, carpooling, etc.)*
- *Preferred parking locations for carpool/rideshare users*

Policy 20 City/County fleet vehicle operators shall replace or convert conventional fuel vehicles with clean fuel vehicles as rapidly as feasible.

Implementation Strategy:

Budget for clean fuel vehicles in long range capital expenditure plans.

Participate in the San Joaquin Valley Clean Cities Coalition to identify fleet vehicle purchase opportunities and shared infrastructure investment opportunities.

Incorporate infrastructure to facilitate the conversion to and use of clean-fuel vehicles. For example, locate L/CNG refueling stations for clean fuel vehicles in convenient and multiple locations to enable convenient and easy refuel of vehicles.

Policy 21 The City/County of _____ shall support the use of teleconferencing in lieu of employee travel to conferences and meetings when feasible.

Implementation Strategy:

With the expansion of technology capabilities, teleconferencing is a readily available and accessible option for many agencies, companies, and individuals. Video and web-based conferencing options are also viable means of meeting and conferencing. Interested public agencies should invest in infrastructure that would allow for telephone, video, and web-based conferencing options. Possible alternatives include the development of a multi-user teleconferencing center, installation of telephone, video, and web-based conferencing technology at existing facilities, and the upgrade of equipment at City/County offices. Use commercial teleconferencing facilities if they are cost competitive considering travel costs and employee time savings.

Policy 22 The City/County of _____ shall encourage departments to set up telecommuting programs as part of their trip reduction strategies.

Implementation Strategy:

Identify positions where telecommuting is feasible. Start a pilot program for the most promising positions with employee volunteers.

Air Quality Benefits:

Policy 19 would encourage City/County Departments to implement innovative trip reduction programs. By encouraging employees to use alternative means of transportation, the number of commute trips generated by City/County workers could be reduced, which would have a beneficial impact on regional air quality.

Policy 20 encourages public vehicle fleet operators to retrofit or replace their conventionally fueled vehicles with cleaner burning fuel systems and vehicles. EPA data suggests that vehicles powered by compressed natural gas (CNG) emit 90 to 97% less carbon monoxide (CO), 25% less carbon dioxide (CO_2), 35 to 60% less oxides of nitrogen (NOx), and 50 to 75% less non-methane hydrocarbon emissions relative to conventional gasoline-powered vehicles, and little to no particulate matter (EPA 2002). Providing infrastructure to conveniently refuel and park clean fuel vehicles will provide incentives for the continued use of these vehicles.

The development of telephone, video, and web-based conferencing technology, as encouraged by Policy 21, would enable government employees and other users to avoid motor vehicle and air travel to meetings. State of the art telephone, video, and web-based conferencing technology can provide two-way, interactive video, audio, and data transmission. Although this technology cannot totally replace face-to-face meetings, it can be effective for many meetings. Telephone, video, and web-based conferencing technology can be very cost-effective for organizations that travel frequently to the same destinations. Money saved from travel expenses can pay the cost of the equipment and any associated charges.

Policy 22 encourages local government agencies to develop telecommuting programs. Telecommuting can be quite effective in reducing vehicle trips and miles traveled by some categories of public employees. Employees could work at home or at a neighborhood telecommuting center. Programs could allow employees to work full time or part time at the remote work site depending on the needs of the job. Because of the relatively short commute distances for most Valley public employees, one would expect limited use of telecommuting centers. Telecommuting centers are most appropriate to serve areas with many long distance commuters and areas with serious traffic congestion. See also the air quality benefits associated with Policy 24.

Programs in Operation:

The District has purchased and plans to continue purchasing hybrid electric-gasoline vehicles, which are considered super ultra low emission vehicles (SULEVs) and advanced technology partial zero emissions vehicles (ATPZEVs), as part of its fleet.

The Los Angeles County Metropolitan Transportation Authority (MTA) is the third largest bus fleet in the nation, and it currently has the largest compressed natural gas (CNG) fleet in the nation with over 1,900 CNG buses in operation, representing over 80% of MTA's fleet. The Golden Empire Transit District (GET) in the Bakersfield Metropolitan area has an active fleet of 79 buses, of which 41 are powered by compressed natural gas, as of 2004.

The U.S. Department of Energy honored the City of Fresno with the City Fleet of the Year award as part of the 2005 Clean Cities National partner Awards program in May 2005. Fresno built a liquefied natural gas (LNG) fueling station and replaced 69 refuse-hauling diesel trucks with LNG-fueled trucks, bring the city in compliance with state regulations five years ahead of schedule.

With the expansion of technology capabilities, teleconferencing is a readily available and accessible option for many agencies, companies, and individuals. Pacific Bell has installed video teleconferencing equipment in several of their major offices in California. Employees in their Fresno office have been able to eliminate some of their trips to Sacramento for staff meetings by teleconferencing.

The District has installed a video teleconferencing system that has been in use for many years. The system has proven successful in saving both money and time, as well as greatly reducing vehicle miles traveled by staff and meeting attendees.

The California State University system has teleconferencing facilities at several campuses, including Sacramento, Bakersfield, Chico, Stanislaus, and Fresno.

Several California cities as well as cities in other states are experimenting with telecommuting to reduce vehicle trips. Telecommuting centers have been established in Ontario, Thousand Oaks, Sherman Oaks, Van Nuys, suburbs of Sacramento, Long Beach, Modesto, San Bernardino, and other cities in California.

Resources:

"Telecommuting - A Handbook to Help You Set Up a Program at Your Company," is an extensive guide to telecommuting prepared by the California Department of Transportation in cooperation with the U.S. Department of Transportation, Federal Highway Administration. A list of the primary author's other publications on telecommuting can be found at <http://www.joannepratt.com/publications.htm>. Local rideshare agencies can provide additional information on implementing telecommuting programs.

Canadian Telework Association/InnoVisions Canada maintains a website with extensive information and guidance regarding telecommuting. Their website is <http://www.ivc.ca>.

CONGESTION MANAGEMENT/TRANSPORTATION CONTROL MEASURES

Issue:

State and federal legislation requires local governments to include strategies to increase the efficiency of transportation infrastructure and to reduce vehicle trips in their transportation plans. Cities and counties can support these strategies by requiring developers to include infrastructure that reduces congestion or trips.

Goal 2: **Reduce traffic congestion and vehicle trips through more efficient infrastructure and support for trip reduction programs.**

Issue:

Transportation control measures (TCMs) are most effective when infrastructure is in place that supports alternative transportation modes. This would include community-wide transportation improvements and on-site improvements at individual worksites and businesses.

Objective 2a To ensure that new development provides the facilities and programs that improve the effectiveness of transportation control measures and congestion management programs.

Policy 23 The City/County of _____ shall consider measures to increase the capacity of the existing road network prior to constructing more capacity (additional lanes, new freeways, etc.).

Implementation Strategies:

Measures that may be included in local and regional transportation plans and capital improvement plans that may increase the capacity and reduce congestion on existing roads include the following:

- *Establish an integrated and synchronized traffic signal network for major thoroughfares to assure smooth-flowing traffic through intersections and to minimize congestion through maintenance of stable traffic flow at intersections*
- *Convert congested streets to one-way couplets where feasible*
- *Modify intersections using turn restrictions, channelization, etc. where necessary and feasible*
- *Redirect truck traffic during peak hours*
- *Construct bus turnouts to remove buses from traveled lanes during passenger loading and unloading*
- *Use freeway ramp metering to promote smoother traffic flow*

Policy 24 The City/County of _____ shall work with employers and developers to provide employees and residents with attractive, affordable transportation alternatives.

Implementation Strategies:

Through zoning ordinance or other means, require new development to provide on-site facilities that encourage employees to use alternative transportation modes as air quality and transportation mitigation measures. Some examples include:

- *Showers and lockers provided in office buildings*
- *Safe and secure bicycle parking areas*
- *On-site employee cafeterias and eating areas*
- *Convenient access to transit waiting areas from offices*

The city or county can provide reduced parking requirements as an incentive for projects to incorporate measures proven to reduce employee commute trips or customer trips.

Some methods employers may use to encourage trip reduction and increased Average Vehicle Ridership include rideshare matching, transit subsidies, vanpool subsidies, flexible work schedules, compressed work weeks, telecommuting, shuttle services, parking management, guaranteed ride home, and

provide preferential or subsidized parking for ride-sharing vehicles.

Reduce parking for businesses that implement strong trip reduction programs.

Encourage employers to provide preferential or subsidized parking for ride-sharing vehicles.

Developers can provide the land use patterns and site designs that increase commuters' ability to walk, bicycle, or use transit to get to work.

Policy 25 The City/County of _____ shall work to establish public/private partnerships to develop satellite and neighborhood work centers for telecommuting.

Note: This policy is best suited for communities with significant numbers of information based workers who currently commute long distances for employment.

Implementation Strategies:

Develop public/private partnerships with long distance commuter-based major employers. Telecommuting centers are generally compatible with mixed-use, pedestrian-oriented, and transit-oriented neighborhood commercial areas.

Identify and provide information and incentives for employer development and participation in telecommuting programs.

Policy 26 The City/County of _____ shall encourage the development of state of the art communication infrastructure linked to the rest of the world.

Implementation Strategies:

Support changes to the State Uniform Building Code to require new homes and businesses to be wired with fiber-optic cables or to require wiring conduits with easy access and adequate capacity to allow for efficient retrofitting. Encourage the development of video-teleconferencing facilities.

Air Quality Benefits:

The policies in this section are intended to provide support for local congestion management and transportation control measure programs. Congestion management programs (CMP) are mandated by state law for urbanized counties with metropolitan areas with 50,000 or more residents. Transportation control measures (TCMs) are required for the San Joaquin Valley by the CCAA and were a part of the mobile source strategy in the District's 1991 Air Quality Attainment Plan. Since their development, these TCMs have been further evaluated and refined by the District. A more detailed description of congestion management programs and the TCM program planned for the San Joaquin Valley is provided in Section III.

TCMs are strategies to reduce emissions by reducing motor vehicle trips, vehicle miles traveled, and idling. They accomplish this by encouraging people to drive less. The ability and willingness of people to drive less is highly dependent on cost, convenience, and comfort of the alternatives to driving alone. Policies throughout this document encourage new development to be constructed in ways that encourage the use of alternative modes of travel. The policies in this section provide some specific actions that can enhance the long-range effectiveness of TCMs.

One of the purposes of congestion management programs is to improve system efficiency by implementing measures that will increase the capacity of the existing system with a minimum of capital improvements. Adopting Policy 23 would place a similar provision in the general plan. The intent of the policy is to make the most efficient use of existing transportation infrastructure by reducing travel demand and by improving traffic flow.

Policy 24 provides a basis for improving transportation options from new and existing development. One way to improve these options would be to provide infrastructure that encourages people to use alternative modes of transportation or to rideshare. This infrastructure could be required as CEQA mitigation or by local ordinance. Providing infrastructure such as cafeterias, showers, lockers, bike lockers, transit shelters, pedestrian amenities, etc. is much easier at the time of initial construction than it is to retrofit them later. Although providing this type of infrastructure does not guarantee that people will change their travel habits, it does eliminate many of the negative factors people consider when choosing their mode of travel.

Policy 25 encourages cities and counties to form public/private partnerships to provide telecommuting centers to mitigate transportation and air quality impacts. Telecommuting centers provide office space in a neighborhood or at a remote site so that employees can avoid commuting to the main office. The main air quality benefits of these centers are due to reduced vehicle miles traveled and reduced congestion en route to the main worksite. In addition to

the air quality benefits, employees can improve their quality of life by increasing time available for their families. Employers can benefit from reduced facility costs and increased productivity (Caltrans). When telecommuting centers are near to residential development, some employees will be within walking or bicycling distance of work and will have a greater potential to use transit to get to work.

Policy 25 is intended for areas where significant numbers of long distance commuters are expected to reside. These areas can provide enough potential users of the centers to make them feasible. As telecommunication technology improves, more jobs will have the potential to be performed at locations remote from the main office. This will result in greater reliance on telecommuting and fewer trips and miles traveled.

A comparison of the travel behavior and personal vehicle emissions of participants in the State of California Telecommuting Pilot Project, first planned in 1985 and finalized in 1990, indicated a 27% reduction in the number of personal vehicle trips, a 77% decrease in vehicle-miles traveled (VMT), and 39% (and 4%) decreases in the number of cold (and hot) engine starts. These decreases in travel translate into emissions reductions of: 48% for Total Organic Gases (TOG), 64% for Carbon Monoxide (CO), 69% for Nitrogen Oxides (NOx), and 78% for Particulate Matter (PM). An analysis of the number of trips and VMT partitioned into commute-related and non-commute-related purposes revealed that non-commute trips increased by 0.5 trips per person-day on average, and non-commute VMT decreased by 5.3 miles (Institute of Transportation Studies, 1996).

Telecommunications technologies are changing the way we work, shop, and conduct personal business. Information is becoming decentralized. This eliminates the need for people to position themselves close to a large mainframe computer or paper files at a centralized location to work. Services such as video rental may become obsolete as technologies offering movies and shows on demand increase in popularity and become more affordable. These technologies eliminate many needs to travel and so eliminate the motor vehicle emissions associated with that travel. Policy 26 is a commitment on the part of local government to bring state of the art telecommunications capabilities to their communities.

Local government can encourage the installation of fiber-optic cable in homes and businesses. Fiber optics are necessary to carry the massive amounts of information required to achieve true interactive voice, data, and image transmission. By placing this capability in the homes and businesses being constructed today, it will be just a matter of turning on a switch rather than a total rewiring effort.

As with most of the other policies in this document, the air quality benefits are long term and incremental. Most transportation control measures apply to existing activities and businesses. This means that when TCMs are initially adopted, the businesses and activities affected will receive limited benefit from new infrastructure. However, as new development proceeds, an increasing percentage of businesses and activities will benefit.

One of the primary intents of air quality elements or policies is to increase the effectiveness of TCMs. Developing land use patterns and transportation infrastructure supportive of alternative modes of transportation can make a dramatic difference in the success of the Transportation Control Measure Program. The District *Amended 2002 and 2005 Rate of Progress Plans for San Joaquin Valley Ozone* estimates that TCMs will be responsible for reducing NOx emissions by 1.5 tons per day (District 2002).

Programs in Operation:

TCMs have been implemented by many local jurisdictions in the San Francisco Bay area and Los Angeles area. The most common measures are employer based commute trip reduction programs. Transportation system measures to reduce congestion, such as signal synchronization and channeling of traffic, are accomplished in most cities and counties in the Valley and other metropolitan areas of California.

In September 1997, the Guaranteed Ride Home program started in Ventura County, providing rides home to persons who use public transit, carpool, or vanpool to get to work or to a job training program in Ventura County who have an emergency, childcare problem, or unanticipated overtime. The program was created to encourage persons to use the bus, train, a carpool, or vanpool by providing a safety net for a ride home in case of emergency. Persons registered in the program will have a free taxi ride or rental car provided, depending on the distance involved. There is no fee for the service to either the individual or employer. Over the first two years, 8,500 individuals and 140 employers have registered, and 260 free rides (226 taxi rides, 34 car rentals) have been provided (American Public Transportation Association, American Public Transit Association 1999).

Since 1993, the Los Angeles County's Telecommuting Program has provided more than 5,000 county employees an alternative way of working without the long commute to work. The home-based telecommuting program allows employees to work from their homes, and the program currently accounts for 98 percent of the county's teleworkers. The telework exchange program option places telecommuters at near-home workstations in other county or city offices. Two telebusiness centers provide a total of 60 workstations for use by public and private employees who live in the Antelope Valley and wish to eliminate the two-hour drive to downtown Los Angeles. The centers have

become self-funded through usage fees charged to client telecommuters or their employees, and facility exchange agreements allow participants to utilize stations at no cost. The county also allows for emergency or short-term telecommuting in the event of natural disasters or public transit strikes (Beardslee 1997).

Resources:

Cities and counties can obtain information about TCMs and congestion management program requirements from their Regional Transportation Planning Agency and from the District, Mobile and Transportation Section.

Ventura County Guaranteed Ride Home Program, Ventura County Transportation Commission (VCTC) 950 County Square Drive Suite 207, Ventura, CA 93003. <http://www.goventura.org/home/index.asp?page=9>.

Los Angeles County's Telecommuting Program, Chief Administrative Office – Office of Workplace Programs, Los Angeles County, 500 W. Temple St., Rm. 526, Los Angeles, CA 90012.

TOXIC AND HAZARDOUS EMISSIONS

Issues:

Past siting decisions for industrial and residential development have created conflicts where none should have existed, raising public concern over exposure to toxic and hazardous emissions. Providing appropriate areas for all types of development can minimize conflicts and promote economic growth.

Goal 3: **Minimize exposure of the public to toxic air pollutant emissions and noxious odors from industrial, manufacturing, and processing facilities.**

Objective 3a To provide adequate sites for industrial development while minimizing the health risks to people resulting from industrial toxic or hazardous air pollutant emissions.

Policy 27 The City/County of _____ shall require residential development projects and projects categorized as sensitive receptors to be located an adequate distance from existing and potential sources toxic emissions such as freeways, major arterials, industrial sites, and hazardous material locations.

Note: This policy is intended to protect existing residential development and other sensitive receptors from conflicts with new industrial development. The types of businesses that are categorized as point sources are often incompatible with residential uses for a number of reasons, including noise, truck traffic, visual concerns, and air quality. These are not the types of businesses encouraged for mixed-use developments or for commercial/office activity centers where we would expect more people to walk to work. The policy recognizes that businesses that are point sources are vital to the economy of the San Joaquin Valley and will be built, but that cities and counties must use care in planning their sites to avoid conflicts.

Implementation Strategies:

Consult with the District to identify sources of toxic air emissions and determine the need for and requirements of a health risk assessment for the proposed development. Consult with project proponents during the pre-application review process to avoid inappropriate uses at affected sites and during the environmental review process for general plan amendments and general plan updates.

Use District stationary source and air toxics location data in a geographic information system. A valley-wide GIS system that could contain this information is being considered now in the early planning phase.

Policy 28 The City/County of _____ shall require new air pollution point sources such as, but not limited to, industrial, manufacturing, and processing facilities to be located an adequate distance from residential areas and other sensitive receptors.

Implementation Strategies:

Require project proponents to prepare health risk assessments in accordance with District recommended procedures as part of environmental review when the proposed industrial process has associated air toxic emissions that have been designated by the state as a toxic air contaminant or, similarly, by the federal government as a hazardous air pollutant.

Designate adequate industrial land in areas downwind and well separated from sensitive uses. Designate non-sensitive land

uses for areas surrounding industrial sites. Protect vacant industrial sites from encroachment by residential or other sensitive uses through appropriate zoning.

Air Quality Benefits:

The policies in this section focus on adequately separating people from industrial processes that emit toxic and hazardous emissions. Although the best way to reduce exposure to these emissions is through source reduction, that program is the responsibility of the District. The role of cities and counties is to plan the arrangement of land uses to minimize exposure. If properly implemented, the policies in this section will help minimize the health risks associated with exposure to toxic air contaminant and hazardous air contaminant pollutant emissions.

Although emissions of criteria pollutants are not reduced by the policies in this section, the real and perceived benefits to the community can be significant. The public often places higher importance on the potential for industrial toxic emissions to cause small increases in the risk of cancer and birth defects than it does on the long term chronic effects of high ozone, CO, PM10, and PM2.5 levels. The policies in this section, if properly implemented, will help minimize the health risks associated with exposure to toxic air contaminant and hazardous air pollutant emissions.

Land use decisions can also raise or lower the potential for acute toxic incidents from accidental chemical spills and gas releases. Industries using and storing extremely hazardous materials should also be located well away from concentrations of people. Programs to manage hazardous materials and to reduce the potential of acute toxic incidents are usually the responsibility of local fire departments.

By protecting industry from encroachment by residential development, local government can help to foster economic growth. Proper planning can avoid industrial/residential conflicts, reducing the potential for litigation and nuisance complaints. This can help communities to retain or attract industrial development.

Programs in Operation:

The District has implemented a comprehensive toxics program. The District's mandates are from AB 1807 Tanner Air Toxics Act, AB 2588 Air Toxics "Hot Spots" Information and Assessment Act, AB 3205 Toxic Emissions Near Schools, SB 1731 "Hot Spots" Risk Reduction Mandates, the Federal Clean Air Act Amendments Title III, and other laws. These bills require inventories, public notification, health risk assessments, and risk reduction under certain circumstances.

The District's Public Notification Procedures Document, mandated by AB 2588, includes procedures that place requirements on certain sources of toxic emissions and on the District. Facilities with theoretical risks greater than specified significance thresholds for which there are no receptors within the impacted area at the present time are deemed potentially significant. An example is an existing chemical manufacturing plant with no development nearby. Under the notification procedures, the District will notify all landowners and land use agencies within the impacted area that there is a source of toxic emissions in the vicinity. This will allow decision makers to take this information into account when making land use decisions involving new sensitive uses. The procedures also require the operator of a potentially significant source to notify the District within 60 days after a receptor locates within the area impacted by the source. An example is the construction of a residential subdivision near an existing source of toxic emissions like a refinery or a chemical plant. This triggers requirements for the toxic source to submit emissions data, prepare a health risk assessment, and for facilities that pose a significant risk to implement measures to reduce emissions.

Through the District's internal referral process, District CEQA staff may send development projects that have potential toxic emissions to Toxic Assessment staff for review and comment. The Toxics Assessment staff may identify projects that require health risk assessments and other actions mandated by state and federal law.

Resources:

The District's Air Toxics Program can provide information regarding this program. (559) 230-5900. <http://www.valleyair.org>.

The ARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, was adopted in April 2005 and is available online at <http://www.arb.ca.gov/ch/aghandbook.htm>. It provides suggested siting distances between sensitive land uses and sources of toxic air contaminants.

FUGITIVE DUST/PM10

Issues:

Levels of PM10 (particulate matter less than 10 microns in diameter) exceed state and federal health based standards. The San Joaquin Valley is classified as a serious nonattainment area for PM10 under the federal criteria. Because of this classification, the District is subject to a series of federal mandates aimed at achieving the federal ambient air quality standards. These include adoption of contingency measures and implementation of Best

Available Control Measures (BACM). Control efforts for sources under the jurisdiction of cities and counties can significantly reduce these emissions. The District adopted the *2003 PM10 Plan* on June 19, 2003 to meet federal requirements. The *2003 PM10 Plan* was amended on December 18, 2003 and May 19, 2005, and the District is currently working on the *2006 PM10 Plan*, due to the EPA March 31, 2006.

Goal 4: **Reduce particulate emissions from sources under the jurisdiction of the city/county.**

Objective 4a To reduce emissions of PM10 and other particulates with local control potential.

Policy 29 The City/County of _____ shall work with the District to reduce particulate emissions from construction, grading, excavation, and demolition to the maximum extent feasible.

Implementation Strategies:

The City/County should include PM10 control measures as conditions of approval for subdivision maps, site plans, and grading permits. This will assist in implementing and enforcing the District's fugitive dust regulation (Regulation VIII, Fugitive PM10 Prohibitions). District rules implementing Regulation VIII were amended in 2001 and again in 2004; see <http://www.valleyair.org/rules/1ruleslist.htm#reg8> for the current version.

The City/County should inform developers of the requirements of the District's Regulation VIII when they apply for a grading permit. Coordinate fugitive dust enforcement actions with the District.

Use strategies to minimize soil disturbances including:

- *Minimize vegetation removal required for fire prevention to the extent compatible with public safety considerations. Utilize alternatives to discing, such as mowing, to the extent feasible. Where vegetation removal is required for aesthetic or property maintenance purposes, encourage or require alternatives to discing*
- *Strongly encourage subdivision designs and site planning which uses landform grading in hillside areas and minimizes grading*

- *Condition grading permits to require that graded areas be stabilized from the completion of grading to commencement of construction*

Policy 30 The City/County of _____ shall require all access roads, driveways, and parking areas serving new commercial and industrial development to be constructed with materials that minimize particulate emissions and are appropriate to the scale and intensity of use.

Implementation Strategy:

Include paving requirements as part of the development standards of the Zoning Ordinance or Subdivision Ordinance.

Policy 31 The City/County of _____ shall reduce PM10 emissions from City/County maintained roads to the maximum extent feasible.

Implementation Strategies:

Develop plans and funding sources to pave heavily used unpaved roads.

Develop a street cleaning program aimed at removing heavy silt loadings from roadways that result from sources such as storm water runoff and construction sites.

Pave shoulders and pave or landscape medians. Curb and gutter installation may provide additional benefits where paving is contiguous to the curb.

Air Quality Benefits:

Relatively simple measures can reduce PM10 emissions from construction activities by 20 to 74 percent. Periodically applying water to construction sites can reduce PM10 emissions by 50 percent. (Monterey Bay Unified Air Pollution Control District (MBUAPCD) 2002). Planting and maintaining vegetation in disturbed areas as soon as possible can greatly reduce PM10 emissions between 5 and 99%, based on planting plan (MBUAPCD 2002). Paving dirt roads and parking areas is very expensive, but is also very effective. The US EPA estimates that paving construction roads and access roads can reduce PM10 emissions by over 90 percent.

The MBUAPCD has summarized the effectiveness of various PM10 control measures. Table 4-1 provides a summary of this information.

Because of the San Joaquin Valley air basin's classification as a serious nonattainment area, the District prepared a *Serious PM10 Nonattainment Area Plan*. The plan included more stringent Best Available Control Measures (BACM). The District adopted a *2003 PM10 Plan* on June 19, 2003. The air quality goals, projections, and BACM of the *2003 PM10 Plan* are based upon the progress of previous PM10 plans, updated PM10 emissions inventories, and current state and federal standards.

The District estimates that the paving of unpaved surfaces (Policy 30) can reduce PM10 emissions from this source by up to 90% (District 1991). Because the paving of all unpaved roads in the Valley is infeasible, Policy 31 is directed at roads that would likely receive heavy vehicular use. Other dust control measures for unpaved roads are also available, including preventing soil transport from areas adjacent to paved roadways by installing curbing or automatic truck and wheel washers, applying water, mechanical stabilization (i.e., compaction), chemical stabilization, limiting speeds or vehicular weight, and covering of unpaved roadways with gravel.

Policy 31 also requires cities and counties to reduce PM10 emissions from paved roadways. One way this can be accomplished is via a street sweeping/cleaning program. Street sweeping in places with high silt loadings can be effective. District Regulation VIII (Fugitive PM10 Prohibitions) contains requirements for local jurisdictions to pave unpaved public roads and unpaved shoulders, street-sweeping program requirements, and post-event street clean-up guidelines (See Rule 8061, Paved and Unpaved Roads). Local jurisdictions should expeditiously implement these requirements and are encouraged to implement similar or superior programs appropriate for their areas of responsibility. The SCAQMD South Coast Air Quality Management District (SCAQMD) has an adopted rule that requires the inclusion of alternative fueled street sweepers (see SCAQMD Rule 1186.1, Less Polluting Sweepers). As technology improves and new street sweeper models are certified as PM10-efficient, local jurisdictions should work closely with the District to determine the best method and equipment.

Cities and counties play a crucial role in obtaining PM10 reductions. PM10 measures may be required as CEQA mitigation, and mitigation measures are usually monitored by local agencies. Most local roads are under the jurisdiction of local governments, so programs to reduce emissions from paved and unpaved roads will be the responsibility of local governments. Control of PM10 emissions from construction activities can be most effectively enforced when the District and local jurisdictions work cooperatively.

Table 4-1 Sample Mitigation for Construction Activities and Emission Reduction Efficiencies

Mitigation Measures	Source Category	Effectiveness	Source
Water all active construction sites at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.	Fugitive emissions from active, unpaved construction areas	50%	U.S. EPA, "AP-42, Vol. I." Pg 11.2.4-1.
Prohibit all grading activities during periods of high wind (over 15 mph).	Grading emissions	Reduces potential for exceedance	SCAQMD, "SIP for PM10 in the Coachella Valley" 1990. Pg 5-15
Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).	Wind erosion from inactive areas	Up to 80%	U.S. EPA, "AP-42, Vol. I." Pg. 11.2.4-1.
Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations	Wind erosion from inactive areas	Up to 80%	U.S. EPA, "AP-42, Vol. I." Pg. 11.2.4-1.
Haul trucks shall maintain at least 2'0" of freeboard.	Spills from haul trucks	90%	MBUAPCD
Cover all trucks hauling dirt, sand, or loose materials.	Spills from haul trucks	90%	MBUAPCD
Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land	Wind erosion from inactive areas	4% (15% for mature trees)	SCAQMD, "SIP for PM10 in the Coachella Valley" 1990. Pg 5-15
Plant vegetative ground cover in disturbed areas as soon as possible.	Wind erosion from inactive areas	5%-99% (based on planting plan)	SCAQMD, "SIP for PM10 in the Coachella Valley" 1990. Pg 5-15
Cover inactive storage piles.	Wind erosion from storage piles	Up to 90%	U.S. EPA "AP-42, Vol. I." Page 11.2.3-4)
Install wheel washers at the entrance to construction sites for all exiting trucks.	On-road entrained PM10	50%	SCAQMD, "SIP for PM10 in the Coachella Valley" 1990. Pg 4-11
Pave all roads at construction sites.	On-road entrained PM10	90%	SCAQMD, "SIP for PM10 in the Coachella Valley" 1990. Pg 4-12
Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours.	All emissions	Minimizes nuisance levels	MBUAPCD
Limit the area under construction at any one time.	Fugitive emissions from active, unpaved construction areas	71 lb/acre/day	MBUAPCD based on U.S. EPA "AP-42," Vol. I

Note: These effectiveness estimates are not additive within a source category (i.e., the benefit of 2 or more mitigation measures that address the same source of emissions would not be the sum of both measures).
Source: Monterey Bay Unified Air Pollution Control District 2002.

Disturbed, non-stabilized farmland coupled with wind events has resulted in severe episodes of blowing dust that have reduced visibility to zero along Valley highways. Programs to stabilize disturbed farmland, for example, through the planting of ground cover, could greatly reduce the possibility of tragic accidents on our highways, reduce the spread of valley fever spores, and prevent exceedances of PM10. On-field agricultural uses are not subject to the requirements of the District's Regulation VIII but are subject to Rule 4550, the District's Conservation Management Practice (CMP) Program, which is one of the key control strategies in the 2003 PM10 Plan.

Rule 4550 was designed to reduce fugitive PM10 emissions from agricultural operations, both on and off fields. Rule 4550 contains the administrative procedures for implementing CMPs in the San Joaquin Valley Air Basin. Rule 3190 provides a mechanism to allow the District to collect fees from the affected agricultural sources to offset the District's administrative and compliance costs of the CMP Program. The CMPs available for grower implementation are included in a CMP list and are described in a CMP Handbook made available to the affected sources.

Programs in Operation:

Most jurisdictions in the San Joaquin Valley now require some level of dust/PM10 control. Some cities have adopted dust control ordinances. Some cities and counties condition grading permits with dust control measures. A number of cities and counties require dust/PM10 control as CEQA mitigation.

Resources:

The District, Planning Department, PM10 Section can provide copies of draft PM10 Rules and further information on PM10 control measures. These can be found at <http://www.valleyair.org/Air_Quality_Plans/AQ_plans_PM.htm>. The Planning Department can be reached at (559) 230-5800.

ENERGY

Issues:

Natural gas burning appliances used for space heating, water heating, and cooking are a sizable source of NOx emissions. Our consumption of electricity also causes pollutant emissions from the operation of power plants fueled by fossil fuels. Local efforts to reduce energy consumption can save consumers money and improve air quality. Furthermore, according to the California Energy Commission, transportation represents about 50 percent of the total energy use statewide (California) (Caltrans 2002 and CEC 2001). California's 22 million automobiles consume more than 13 billion gallons of

gasoline. If current trends continue, gasoline use is projected to increase by approximately 40% from 2000 to 2020 (Caltrans 2002 and CEC 2000).

Goal 5: Reduce emissions related to energy consumption and area sources.

Issue:

Simple and cost-effective designs, technologies, and methods are available to achieve energy savings and reduce air pollutant emissions.

Objective 5a To encourage the use of energy conservation features and low-emission equipment for all new residential and commercial development.

Policy 32 The City/County of _____ shall work with the local energy providers and developers on voluntary incentive-based programs to encourage the use of energy efficient designs and equipment.

Implementation Strategies:

Encourage the incorporation of energy conservation features in the design of all new construction and the installation of conservation devices in existing developments.

Encourage energy audits of existing structures, identifying levels of existing energy use and potential conservation measures.

Encourage the use of passive design concepts that make use of the natural climate to increase energy efficiency.

Encourage new development not to preclude the use of solar energy systems by uses and buildings on adjacent properties.

Incorporate the most energy-efficient design consistent with a reasonable rate of return and the recognition of the environmental benefits of energy conservation for all local government facilities and equipment.

Perform an energy audit of existing public buildings within five years and retrofit where cost-effective.

Develop an energy management system for public buildings.

Policy 33 The City/County of _____ shall cooperate with the local building industry, utilities and the District to promote enhanced energy conservation standards for new construction.

Implementation Strategy:

Work with the California Energy Commission (CEC) and local utilities to identify areas of the existing state standards that can be enhanced most cost-effectively.

Policy 34 The City/County of _____ shall encourage new residential, commercial, and industrial development to reduce air quality impacts from area sources and from energy consumption.

Note: Area sources include small stationary equipment such as water heaters, fireplaces, barbecues, and gardening equipment. These sources are small individually, but collectively they are significant because of their large numbers and widespread use.

Implementation Strategies:

Support the use of weatherization programs for existing residential units and businesses.

Examine the possibility of requiring the installation of supplemental solar water heaters for new residential units.

Support future District incentives and regulations to reduce emissions from swimming pool heaters.

Encourage the use of solar water and pool heaters, and energy efficient lighting.

Encourage developers to orient housing units and landscape building sites to maximize solar heating and cooling.

Encourage the installation of energy efficient fireplaces and wood stoves in lieu of normal open-hearth fireplaces.

Provide natural gas lines or electrical outlets to backyards to encourage the use of natural gas or electric barbecues, and electric gardening equipment.

Support the use of electric vehicles, such as golf carts, where appropriate. Provide electric recharge facilities for electric vehicles.

Air Quality Benefits:

Local programs to increase energy efficiency can reduce demand for electricity by 10 to 40 percent beyond levels expected from state mandated programs (CEC 1993). Reducing the demand for electricity will reduce pollutant emissions from fossil fuel power plants. Reducing home and commercial uses of natural gas for space and water heating will reduce NOx emissions by an amount proportional to the energy savings.

Local programs can target both new and existing development. Programs targeted at retrofitting existing residences and businesses can achieve the greatest reductions in energy use. This is because 75 percent of the homes built in California were built prior to adoption of efficiency standards. Programs to go beyond state energy efficiency standards or to better enforce the existing standards for new construction can improve energy efficiency by 11 percent or more (CEC 1993).

Energy conservation also provides economic benefits to the community. Every dollar not spent by local residents on energy is available for spending on other goods and services in the community.

Recent improvements in electric powered gardening equipment provide inexpensive and less-polluting alternatives to gasoline-powered equipment. Using a gasoline-powered mower for one hour emits as much pollution as 40 late-model cars operating for the same period of time. New electric models are cordless and rechargeable and are easier to operate and maintain than gasoline powered equipment. The ARB estimates that using electric powered mowers instead of gasoline mowers decreases emissions 70-fold even after taking into account the electric power plant emissions (Green Consumer 1993).

Lighting is the single largest component of commercial energy consumption. The EPA estimates that if energy-efficient lighting were used wherever cost-effective, then electricity consumption nationwide would be reduced 10%, and power plant emissions of air pollutants such as SO_2 and NOx would be reduced by 4 to 7%.

Programs in Operation:

The Pacific Gas & Electric Company (PG&E) has several commercial new construction energy efficiency programs available to owners, developers and contractors. For example, Savings by Design pays cash incentives to

commercial, industrial, and agricultural customers to encourage energy-efficient design and construction.

Resources:

The California Energy Commission's Energy Aware Planning Guide provides an extensive discussion of local programs to reduce energy consumption and related air pollution. It includes general plan policy language, implementation ideas, environmental benefits, programs in operation, and resources. It is available at <http://www.energy.ca.gov/reports/energy_aware_guide.html>.

California Energy Commission, Energy Efficiency and Demand Analysis Division, 1516 9th Street, MS-25, Sacramento, CA 95814. <http://www.energy.ca.gov/efficiency/index.html>

IDEAS Program Manager, City of San Jose, Office of Environmental Management, 777 N. First Street, Suite 450, San Jose, CA 95112.

Information on PG&E incentive programs may be obtained from local PG&E offices, <http://www.pge.com/biz/rebates/>.

SUGGESTED GOALS AND POLICIES FOR LAND USE ELEMENTS

This section provides policies that are best suited for the land use element of the general plan. These policies, if adopted, would affect the future development patterns of the community and as such require close examination by each community to determine their acceptability. If a jurisdiction decides to use these policies in a separate air quality element, care should be exercised to avoid conflicts with the land use element. Cities and counties in the San Joaquin Valley are required by California Government Code to include air quality considerations in the development of their General Plans. In general, to encourage land use strategies that promote alternatives to single occupancy vehicle travel, local governments may use zoning and subdivision regulations, monetary incentives (tax breaks, impact fee adjustments), or non-monetary incentives (such as accelerated permit processing or reduced parking requirements).

Principles for Land Use Planning for Improved Air Quality

The Air District strongly encourages cities and counties of San Joaquin Valley to:

- Plan land use patterns that will encourage people to walk, bicycle, or use public transit for a significant number of their daily trips
  - Use comprehensive community plans and specific plans to ensure development is cohesive and well connected by alternative transportation modes
  - Adopt transit-oriented or pedestrian-oriented design guidelines and designate areas appropriate for these designs in the general plan
  - Encourage higher density development in proximity to frequently used services and transportation facilities

- Develop in a compact, efficient form to minimize vehicle miles traveled and to improve the effectiveness of alternatives to the automobile
  - Use the control of public services to direct growth to the most appropriate locations
  - Encourage infill of vacant land and redevelopment sites

- Promote project site designs and subdivision street and lot designs that encourage walking, bicycling, and transit use
  - Adopt design guidelines and standards promoting designs that encourage alternative transportation modes
  - Require certain sites to be designed to allow convenient access by transit, bicycle, and walking.

LAND USE, TRANSPORTATION AND AIR QUALITY

Issue:

Motor vehicle use has historically been a major cause of exceedances of state and federal ozone and carbon monoxide standards in the San Joaquin Valley. The land use pattern and transportation system developed over the last 50 years has led to ever increasing vehicle trips and vehicle miles traveled. New ways of developing the land and meeting our mobility needs are necessary to reverse this trend and to improve our air quality.

Goal 6: **Reduce motor vehicle trips and vehicle miles traveled and increase average vehicle ridership (AVR).**

Note: Policies in this section are divided into two main categories: land use and transportation infrastructure. Land use policies show a commitment to design future development in ways that encourage alternative modes of transportation and make the most efficient use of land available for development to reduce trips and miles traveled. Transportation infrastructure policies demonstrate the commitment to design and construct our transportation system in ways that promote the use of alternative transportation modes.

LAND USE: LAND USE PATTERN

The term "land use pattern" refers to the distribution of land uses in a geographic area. It includes factors such as the density of population, housing, and jobs, and the mix of uses (proximity of housing, commercial, industrial, public facilities to one another). The general plan represents the community's vision of its future land use pattern.

Issues:

Existing land use patterns in most urban areas in the San Joaquin Valley are not conducive to walking, cycling, and transit use. Many office developments have low employment densities and are often isolated from commercial services, forcing people to drive rather than walk to restaurants during the lunch hour or to complete errands. High-density residential projects often have little if any commercial development nearby or discourage pedestrian access to commercial uses with block walls and large parking lots. The most common single-family lot size of 6,000 to 10,000 square feet leads to population densities too low to support frequent and direct transit service. The predominant suburban development patterns force all local trips for

shopping, recreation, school, as well as commute trips onto the arterial street system. This leads to ever wider, more congested arterial streets that in turn discourage people from walking or cycling to even nearby destinations.

Objective 6a To create a land use pattern that will encourage people to walk, bicycle, or use public transit for a significant number of their daily trips.

Policy 35 The City/County of _____ shall consider air quality and mobility when reviewing any proposed change to the land use pattern of this community.

Implementation Strategy:

Incorporate the review of air quality and mobility issues in the discretionary review process. This step could be part of the CEQA process established by the jurisdiction.

Identify areas best suited to development in terms of air quality and transportation impacts and direct growth to those areas.

Air Quality Benefits:

Adopting this policy provides a strong commitment to air quality. Placing a high priority on air quality can ensure that the following policies are strongly enforced.

Programs in Operation:

The CEQA process requires that air quality be address during the environmental review. California Government Code Section 65302.1 requires cities and counties in the San Joaquin Valley to amend appropriate elements of general plans to include data and analysis, comprehensive goals, policies, and feasible implementation strategies to improve air quality no later than one year after the first housing element revisions that occur after January 1, 2004. The next revision for Fresno and Kern Counties is June 30, 2008. The next revision for Stanislaus, San Joaquin, Merced, Kings, Tulare, and Madera Counties is June 20, 2009.

Policy 36 The City/County of _____ shall encourage projects proposing pedestrian or transit-oriented designs (TOD) at suitable locations. A TOD is defined as a

"Moderate to higher-density development, located within an easy walk of a major transit stop,

generally with a mix of residential, employment and shopping opportunities designed for pedestrians without excluding the auto. TOD can be new construction or redevelopment of one or more buildings whose design and orientation facilitate transit use." (Caltrans 2002)

Implementation Strategies:

Develop Transit/Pedestrian-Oriented Design Guidelines. Identify and designate appropriate sites for this development pattern during general plan updates and when developers propose general plan amendments.

Prepare a specific plan or community plan for new development areas. Incorporate design guidelines and standards into the specific plan.

Note: Implementation of this policy would be a major part of a comprehensive land use, transportation, and air quality strategy. Most of the following land use policies support the concepts and principles of transit and pedestrian-oriented design.

Resources:

County of Sacramento, Transit-Oriented Design Guidelines, Sacramento County Planning and Community Development Department, 827 7th Street, Room 240, Sacramento, CA 95814.

City of San Diego, Transit-Oriented Design Guidelines, City of San Diego, Planning Department

San Diego Air Pollution Control District Tools for Reducing Vehicle Trips Through Land Use Design: Increasing Bicycling, Walking, and Transit Use in the San Diego Region. This document provides guidance and resource for municipalities, citizen groups, and planning practitioners to use in reducing vehicle trips and preserving other scarce resources through the land use planning process. Available from the San Diego Air Pollution Control District, 9150 Chesapeake Avenue, San Diego, CA 92123.

The San Bernardino document referred to above can be purchased from The Planning Center, 1300 Dove Street, Suite 100, Newport Beach, CA 92660.

Policy 37 The City/County of _____ shall work to preserve and enhance existing neighborhoods and commercial districts having transit and pedestrian-oriented designs.

Implementation Strategy:

Pursue redevelopment projects to improve the image of pedestrian-oriented neighborhoods and shopping districts (pedestrian amenities, street trees, transit facilities, etc.).

Air Quality Benefits:

A comprehensive transit/pedestrian-oriented program achieves air quality benefits by creating an environment conducive to the use of alternative modes of transportation. It is estimated that mixed-use and higher density strategies can achieve a 10 to 30 percent reduction in per-household vehicle travel and related emissions at the neighborhood or community level, while multi-modal transportation systems can reduce regional vehicle travel and associated emissions by 5 to 15 percent (ARB 1997). A Further, a combination of TOD and high levels of transit service can increase the use of transit within a neighborhood by 20 to 40% (Caltrans 2002). In addition, as these strategies are implemented throughout a community, potential reductions in site-specific travel also become greater. A fully implemented transit/pedestrian-oriented policy combines all the strategies listed by the ARB and could be expected to achieve similar reductions. More discussion on land use factors affecting choice of travel mode is provided in Section III.

Programs in Operation:

Within San Diego, the Uptown District is a pedestrian-oriented, mixed-use development combining a 140,000 square foot retail/office center, a 3,000 square foot community center, and 320 attached multi-family residential units.

The County of San Bernardino in cooperation with a number of cities within that County have prepared a document entitled Land Use, Transportation and Air Quality, A Manual for Planning Practitioners, San Bernardino Air Quality Plan. This document provides design examples and development principles for reducing mobile source emissions. The document is organized by development density and provides trip reducing tools and applications for each density.

The San Diego Air Pollution Control District has prepared a document entitled Tools for Reducing Vehicle Trips Through Land Use Design: Increasing Bicycling, Walking, and Transit Use in the San Diego Region. This document provides guidance and resource for municipalities, citizen groups, and

planning practitioners to use in reducing vehicle trips and preserving other scarce resources through the land use planning process.

Local Government Commission in partnership with the District has prepared Visual Tools to Encourage Compact Development and Walkable Streets in the San Joaquin Valley. The tools are two interactive visual presentations to increase the awareness of San Joaquin Valley local government staff, local policymakers, developers, and residents to the environmental, health, fiscal and aesthetic benefits for compact development, narrow street design and traffic calming.

Village Homes (Figure 4-1) in the City of Davis is a planned unit development of single-family homes, apartments, a community center and office building on a 60-acre site. Davis is located fourteen miles west of the state's capital city, Sacramento. Village Homes features solar water and space heating, natural cooling systems, agricultural areas and greenbelts, cooperative maintenance of common areas, a well-used bicycle and pedestrian path network, and a natural drainage system. The project serves as a national model for environmentally sustainable development, energy-conserving planning, architecture and engineering, and community planning. Energy consumption is one-third to one-half lower than that of neighboring developments.

The concept plan for a major intersection in Citrus Heights, California, an older suburb of Sacramento, offers an innovative solution for repairing the suburbs by creating a mixed-use urban village. The plan proposes to take one of the busiest intersections in Sacramento County underground and, over a twenty-five year period, reclaim the area with office space, housing, open space, retail and transit using regional transportation funds.

Figure 4-1 Village Homes, Davis, California



Resources:

County of Sacramento, Transit-Oriented Design Guidelines, Sacramento County Planning and Community Development Department, 827 7th Street, Room 240, Sacramento, CA 95814.

City of San Diego, Transit-Oriented Design Guidelines, City of San Diego, Planning Department

Local Government Commission and San Joaquin Valley Unified Air Pollution Control

District, Visual Tools to Encourage Compact Development and Walkable Streets in the San Joaquin Valley. Available from the Local Government Commission, 1414 K. Street, Suite 600, Sacramento, CA 95814-3966.

San Diego Air Pollution Control District Tools for Reducing Vehicle Trips Through Land Use Design: Increasing Bicycling, Walking, and Transit Use in the San Diego Region. This document provides guidance and resource for municipalities, citizen groups, and planning practitioners to use in reducing vehicle trips and preserving other scarce resources through the land use planning process. Available from the San Diego Air Pollution Control District, 9150 Chesapeake Avenue, San Diego, CA 92123.

The San Bernardino document referred to above can be obtained from The Planning Center, 1300 Dove Street, Suite 100, Newport Beach, CA 92660.

Policy 38 The City/County of _____ shall plan areas within 1/4 mile of locations identified as transit hubs and commercial centers for higher density development.

Implementation Strategy:

Amend the General Plan and the Zoning Ordinance to designate high-density land uses in areas planned for transit hubs and commercial centers.

Highest density development should be located closest to transit stops and routes

Zone for higher densities in transit corridors

Decrease parking requirements along major transit corridors

Consult with transit providers to determine which transit corridors should be emphasized in planning surrounding land uses

Air Quality Benefits:

Developing high-density residential and commercial uses within walking distance of transit facilities increases the number of potential transit users. With an adequate pool of transit riders, more frequent service becomes feasible. This in turn increases the convenience of the transit option for more people (ARB 1993). The ARB found that significantly increasing walking and transit opportunities along with strategically located moderated to high density development and transit could achieve an annual reduction in VMT of

between 20-30 percent (ARB 1995). It is estimated that people living within 1/4 mile of a transit stop or station are nearly three times more likely to use transit than those who live between 1/4 and 2 miles from a station. In addition, residents living within 2 miles of a transit station are nearly four times more likely to use transit for commuting than those who live greater than 2 miles from a station (ARB 1997). Also see Policy 35.

Programs in Operation:

Similar policies have been adopted in numerous California jurisdictions including Pleasanton, Costa Mesa, Folsom, San Diego, Davis, and Sacramento County. Also see Policy 36 and Policy 38.

Resources:

See Policy 36

Policy 39 The City/County of _____ shall encourage higher housing densities in areas served by the full range of urban services.

Implementation Strategies:

Designate high and medium-density housing at sites within walking distance of transit, neighborhood commercial services during general plan updates and developer initiated general plan amendments.

Establish minimum housing densities for areas around existing and planned transit nodes.

Award density bonuses for projects furthering transit or pedestrian-oriented amenities

Encourage developers to take advantage of density bonus provisions of the Zoning Ordinance for projects located around transit hubs or nodes on existing or planned transit corridors.

Air Quality Benefits:

Policies 37 and 38 are density strategies for improving air quality. A worldwide survey of travel patterns in 32 major cities found that gasoline consumption was reduced 25 to 30 percent for each doubling of population density (Kenworthy and Newman 1990), while the average annual rate of vehicle travel per person tends to be reduced between 25 and 30% for each

doubling of density (ARB 1997). A study of two Chicago area transit systems indicated that a 24 to 50% increase in transit boardings was associated with a doubling in employment densities near transit stations, while a doubling of residential and employment densities could be associated with a 66% increase in rail boardings (Caltrans 2002). To obtain the greatest trip reduction potential, high-density housing should be oriented to take advantage of public transportation and commercial services within walking distance. California's Density Bonus Law requires local governments to grant 25% density bonus for low income, very-low income, and senior housing, while another state law allows jurisdictions to grant a 25% density bonus for developers of housing within a half-mile of transit stations.

Strategies to increase density must be pursued with caution. Apartment projects adjacent to existing residential development frequently arouse fierce neighborhood opposition. Although traffic generated per dwelling unit is significantly less, the greater number of units may still have adverse traffic impacts. Efforts must be made to inform and educate the public regarding the development of increased density land uses. The ability of public facilities to absorb increased demand for services must also be considered. Strong design standards for multi-family projects can help overcome neighborhood opposition. Requiring project designs that fit into the neighborhood and are attractive promote acceptance.

Another important factor is public safety. High-density housing has gained a negative reputation as a breeding ground for crime. There are proven designs and layouts that can make higher densities safer and attractive.

High-density development should be viewed as a resource to be used to reduce dependence on the private automobile. All large cities in the Valley and some small cities construct significant numbers of high-density housing units; however, most of the units are placed in locations that make residents automobile dependent. Maximizing the number of units within 1/4 mile of public transit and frequently needed goods and services while orienting the development to make walking a pleasant experience will significantly reduce vehicle trips.

Programs in Operation:

The Model Zoning Regulations for the Tri-County Metropolitan Transportation District of Oregon (Portland metropolitan region) provide good examples of zoning regulations that emphasize these planning principles, while the Urban Growth Management Function Plan provides a framework and requirements for regional planning throughout the Portland Metropolitan area. The San Diego Association of Governments approved a Land Use Distribution Element in 1995 that encouraged local governments to specify minimum densities for new development and infill; encourage a mix of land uses; ensure good

pedestrian access; and provide interconnected local circulation systems especially in the vicinity of rail transit stations and major bus corridors. It was also suggested within the Element were that housing and services to meet the needs of a portion of employees be included in the design of major employment centers. In addition, the Element establishes "access standards" that define maximum acceptable travel times for work, shopping, and service-related trips by 2010. In urban areas, these standards are provided for trips made by both transit and automobiles. The City of San Diego has incorporated the Transit-Oriented Design Guidelines into several specific plans and has also revised its zoning code.

Also see Policy 36.

Resources:

See Policy 36

Policy 40 The City/County of _____ shall encourage mixed-use developments that provide commercial services such as day care centers, restaurants, banks, and stores near employment centers.

Implementation Strategies:

Create a mixed-use zone district. Tailor the allowed uses to those best suited for a pedestrian environment.

Designate mixed-use areas during general plan updates.

Air Quality Benefits:

An appropriate mix of land uses at a destination provides people arriving by transit, carpool, or vanpool with a range of activities within walking distance from their point of arrival. Mixed-uses reduce the need to make separate trips to obtain frequently needed goods and services (TRI-MET 1993). The clustering of land uses may reduce vehicle trip generation by up to 45% for residential uses and 65% for non-residential uses (ARB 1997). Also see Policy 35.

Programs in Operation:

The Municipality of Metropolitan Seattle (METRO) encourages jurisdictions within the Puget Sound region to use varied planning tools, such as planned unit developments, floating zoning, incentive zoning, zoning overlays, and

land banking to provide flexibility in their land use planning efforts (METRO 1987).

Portland Metro's Urban Growth Management Function Plan provides a framework and requirements for regional planning throughout the Portland Metropolitan area.

The San Diego Association of Governments have adopted the Land Use Distribution Element, as well as the Congestion Management Plan and Congestion Management System to slow the growth of traffic congestion in the region, and the Regional Energy Plan, which seeks to reduce the dependence on outside energy sources.

Many older areas in the City of Sacramento successfully mix commercial, office and residential uses. These neighborhoods continue to be desirable and vibrant places to live and work.

Resources:

The Mixed-use Development Handbook (Urban Land Institute, 2003) provides examples of mixed-use developments and discusses full range of development issues. ULI, 1025 Thomas Jefferson St., NW Suite 500 West Washington, DC 20007. Available for purchase at <http://www.uli.org/AM/Template.cfm?Section=Search&Template=/Ecommerce/ProductDisplay.cfm&ProductID=636>.

San Diego Air Pollution Control District Tools for Reducing Vehicle Trips Through Land Use Design: Increasing Bicycling, Walking, and Transit Use in the San Diego Region. This document provides guidance and resource for municipalities, citizen groups, and planning practitioners to use in reducing vehicle trips and preserving other scarce resources through the land use planning process. Available from the San Diego Air Pollution Control District, 9150 Chesapeake Avenue, San Diego, CA 92123.

Building Livable Communities with Transit. A Policymaker's Guide to Transit-Oriented Development. This document provides guidance, tools, and examples of transit oriented development. Available from the Local Government Commission, 1414 K St, Suite 600, Sacramento, CA 95814. <http://www.lgc.org/freepub/land_use/articles/buildcomm.html>.

Also see Policy 36.

Policy 41 The City/County of _____ shall promote the downtown (or village centers) as the primary pedestrian-oriented, commercial and financial center(s) in the city/community.

Implementation Strategies:

Designate a central core of the city for high-density and mixed-use development. Discourage high intensity office and commercial uses from locating outside of designated centers or downtown.

Provide financial incentives and density bonuses to entice development within the designated central core of the city.

Cities with declining downtown areas should consider recycling underutilized and abandoned uses with new uses that compliment the area. Avoid designating competing uses on the edge of the city and in unincorporated areas.

Air Quality Benefits:

A healthy downtown business district provides a concentration of activities that increase potential transit use for commute trips and, in some cases, shopping trips. High employment densities help support retail and service businesses, allowing people working downtown to walk for daytime errands and lunch trips. In a study of employee travel, mixing of uses increased the use of nearby facilities by 9% in suburban areas and over 30% in the downtown (ARB 1995).

A survey of suburban office workers found that about half left their building during the day. In an area with mixed-use high-density development and pedestrian facilities, 25 percent of the trips were made on foot, compared to 6 percent in a more homogenous, sprawling area (CEC 1993). A study of a major mixed-use suburban activity center found a 7% transit usage and that 25% of midday trips were walk trips, which is significantly higher than typical suburban centers which had 1% transit and 16% midday walk trips (ARB 1995).

A village center can be the focus of community activity, providing a variety of complimentary destinations within walking or cycling distance of village residences. The Uptown District in San Diego is estimated to result in a reduced rate of driving and associated motor vehicle emissions of about 20% per household annually, compared to typical vehicle travel from the same number of housing units in a lower density and more auto-oriented urban pattern. It is also estimated that the Uptown District results in annual air

pollution savings of about 2.75 tons of reactive organic gas (ROG) and oxides of nitrogen (NOx) per year.

The Crossings development in Mountainview is estimated to result in a reduced rate of driving and associated motor vehicle emissions of about 10% per household annually, compared to typical vehicle travel from the same number of housing units in a lower density and more auto-oriented urban pattern. It is also estimated that The Crossings results in an annual air pollution savings of about 3 tons of reactive organic gas (ROG) and oxides of nitrogen (NOx) per year (ARB 1997).

Programs in Operation:

The City of Orlando, Florida has implemented a similar policy of providing density bonuses for development in their downtown. Most cities in the San Joaquin Valley have policies and programs to support or revitalize their downtown areas.

Development within San Diego's Uptown District has established a pedestrian-oriented, mixed-use development combining a 140,000-square-foot retail/office center, a 3,000-square-foot community center, and 320 attached multi-family residential units. As noted above, it is estimated that the Uptown District results in an annual air pollution savings of about 2.75 tons of reactive organic gas and oxides of nitrogen per year.

The City of Sacramento has been engaged in a program to recycle outmoded industrial areas adjacent to downtown with new office, commercial, and public facilities and providing access to these areas by light rail.

The Metropolitan Bakersfield General Plan promotes a centers concept with downtown as the primary center and several suburban centers based on educational institutions and business centers. The Downtown Association of Fresno, funded in part by the Redevelopment Agency of the City of Fresno, is working to improve, promote, and develop the historic Central Business District. California's Main Street Program has 39 cities participating in a four-point framework of organization, promotion, design, and economic restructuring to redefine participants as the hearts of the communities.

Resources:

"Putting the Urb in the Suburbs: Many Places are Deciding they Need A Real Center After All," *Planning*, June 1997

National Main Street Center, a project of the National Trust for Historic Preservation that supports commercial district revitalization through historic

preservation and economic development. 1785 Massachusetts Avenue, N.W., Washington, DC 20036. Available online at <http://www.mainst.org>.

California Main Street Program, a program of the Office of Historic Preservation. <http://www.californiamainstreet.ca.gov>.

Redevelopment Agency, City of Fresno. <http://www.fresno.gov/vision2010/>.

"Smart growth zoning codes: A resource guide." Local Government Commission, Steve Tracy. Spring 2003. Available for purchase at <http://www2.lgc.org/bookstore/detail.cfm?itemId=34>.

Policy 42 The City/County of _____ shall plan adequate neighborhood commercial shopping areas to serve new residential development.

Note: Neighborhood commercial has different meanings in different jurisdictions. For the purposes of this document, neighborhood commercial includes shops and services now found in supermarket- anchored shopping centers as well as convenience retail found in small strip malls.

Implementation Strategy:

Designate commercial areas during general plan updates and when developers initiate general plan amendments.

Provide materials on successful mixed-use developments to project applicants in areas designated for commercial land uses. Such materials could include the TOD Design Guidelines prepared for Sacramento County (1990).

Adopt zoning regulations that permit upper story residential uses in neighborhood shopping areas. These upper story uses can include residential and office. The City of San Diego Tools for Reducing Vehicle Trips Through Land Use Design (1998) provides a good example of this type of community design.

Air Quality Benefits:

Nationwide, 45 percent of all vehicle trips are for shopping or personal business and the average length is approximately 10 miles (U.S. Department of Transportation 1999 and 2001). By providing the most frequently needed products and services close to residences and by providing direct, safe, and interesting pedestrian or bicycle routes to the commercial area, vehicle travel

can be reduced. Surveys conducted in five US cities indicated that 70 percent of people surveyed would be willing to walk or bicycle for personal business and shopping trips if the trips were reduced to 1/2 mile in length and bicycle paths and pedestrian walkways were provided (CEC 1993).

Programs in Operation:

See Policy 36

Resources:

See Policy 36

Policy 43 The City/County of _____ shall encourage subdivision designs that provide neighborhood parks in proximity to activity centers such as schools, libraries and community centers.

Implementation Strategy:

Designate park sites during general plan updates and when processing large general plan amendments. Require developers to dedicate park sites at the most advantageous locations as a condition of approval of subdivision maps.

Prepare comprehensive community plans or specific plans designating community amenities at sites that are accessible by walking and bicycling.

Air Quality Benefits:

Public parks are often the primary pedestrian amenity for a community or neighborhood. The foot traffic and socializing created by the parks can carry over to adjacent or nearby public and commercial uses. The design and location of the park is very important to its usefulness as a pedestrian destination and activity center. Parks should be visually accessible from the neighborhood and frequently used to encourage a feeling of ownership (Weissman 1992).

Programs in Operation:

See Policy 36

Resources:

See Policy 36

Policy 44 The City/County of _____ shall work closely with school districts to help them choose school site locations that allow students to safely walk or bicycle from their homes.

Implementation Strategies:

When specific plans or subdivisions propose school sites for dedication, accept only sites that allow students to safely walk or bicycle to school.

Incorporate school sites into larger neighborhood activity centers, which could include parks, day care facilities, and neighborhood commercial uses.

Air Quality Benefits:

Schools are important centers of community activity and generate numerous trips. Siting and access considerations can make a significant difference in the number of students who would walk or bicycle to school. The same principles of pedestrian friendly design apply to children as they do to adults; however, safety considerations take on greater importance.

Programs in Operation:

The City of Modesto's Village-1 Specific Plan designates all school sites in the plan. The sites emphasize pedestrian and bicycle access.

Laguna West, Transit-Oriented Development, Sacramento County.

For residential and mixed-use developments, Portland Metro's Urban Growth Management Function Plan calls for new local street plans that encourage pedestrian and bicycle travel by providing short, direct public right-of-way routes to connect residential uses with nearby existing and planned commercial services, schools, parks and other neighborhood facilities.

Resources:

The City of San Diego TOD Design Guidelines (1992) provide a good example of this community design principle. Information on this and other TOD areas in California is available at <http://transitorienteddevelopment.dot.ca.gov/Profiles/TOD%20Summaries.pdf>.

See Policy 36.

Policy 45 The City/County of _____ shall plan park and ride lots at suitable locations serving long distance and local commuters.

Implementation Strategies:

Work with Caltrans and the Public Works Department to identify suitable sites. Designate sites on the general plan land use and circulation plans. Consider funding of the park and ride lots as mitigation during CEQA review of residential development projects.

Coordinate with appropriate transportation agencies and major employers to establish express buses and vanpools to increase the patronage of park and ride lots.

Allow developers to reach agreements with auto-oriented shopping center owners to use commercial parking lots as park and ride lots and multimodal transfer sites.

Air Quality Benefits:

The maximum benefits from this policy are achieved by targeting long distance commuters. This is because of the problem of cold start emissions from home to the park and ride lot and back. Park and ride lots for local commuters only achieve significant emission reductions when the route to the destination is heavily congested. See Section III of this document for a more detailed discussion of mobile source emission characteristics.

Park and ride lots in both downtown fringe areas and suburban areas both have fairly minimal trip reduction potential, mainly because there are limited markets for such facilities in the Valley. Fringe parking in the downtown might prevent short trips to different destinations within the downtown area, and this would help localized air quality. But trips to even the largest downtown in the Valley represent only a few percent of total trips made, and fringe parking would eliminate only a fraction of these. Park and ride lots in suburban communities may have moderate effectiveness in intercepting outbound commute trips, thereby eliminating significant VMT but relatively few trips, since most carpoolers would drive to the park and ride lot (EPA 1990). An analysis conducted for this document concludes that San Joaquin Valley communities can reduce trips by 0.5 to 1.5 percent through the use of park and ride lots (TJKM 1993).

Programs in Operation:

Many Valley metropolitan areas have park and ride lots in place.

Resources:

Caltrans District 6, P.O. Box 12616 Fresno, CA 93778-2616.
<http://www.dot.ca.gov/dist6/>

Policy 46 The City/County of _____ shall plan for multi-modal transfer sites that incorporate auto parking areas, bike parking, transit, pedestrian and bicycle paths, and park and ride pick-up points.

Implementation Strategies:

Identify locations where transportation systems converge and designate the area as a potential multi-modal transfer site in the general plan.

Apply for funding to construct a multi-modal transfer station. Sources for funding include Federal Highway funds and transit funds.

Air Quality Benefits:

Providing multi-modal transfer sites increases transit's convenience and eliminates cold starts by people who are able to walk or bicycle to the transit stop instead of driving. The best transit system in North America, located in the City of Toronto achieves a 31 percent mode split during commute hours (Kenworthy 1991). In 2000, 1.4% of Kern County workers over age 16 used public transportation, and 18.4% carpooled. 1.7% of Fresno County workers over age 16 used public transport, and 16.7% carpooled (US Census Bureau 2003).

Programs in Operation:

Many of the Bay Area Rapid Transit System's (BART) stations are connected to a bus system and provide bicycle and pedestrian amenities. The cities of Walnut Creek and Pleasant Hill have prepared a specific plan focusing development in a 125-acre area around the Pleasant Hill BART station. Residents of apartments in the plan area use BART for as many as 40 percent of their commute trips (Weissman 1992).

The Portland Metropolitan's TriMet transit service provides a interconnected light-rail and bus services that incorporate park-and-ride lots, auto parking

areas, and pedestrian, bicycle, and transit-oriented high density. It is estimated that Portland's emphasis on TOD-style communities throughout the region has resulted in a 7% decrease in VMT, 5% increase in transit use, and 10% increase in walking trips, and it is estimated that pedestrian travel accounts for 16% of all trips (Caltrans 2002).

Resources:

See Policy 36

San Diego Air Pollution Control District, Tools for Reducing Vehicle Trips Through Land Use Design: Increasing Bicycling, Walking, and Transit Use in the San Diego Region. This document provides guidance and resource for municipalities, citizen groups, and planning practitioners to use in reducing vehicle trips and preserving other scarce resources through the land use planning process. Available from the San Diego Air Pollution Control District, 9150 Chesapeake Avenue, San Diego, CA 92123.

Policy 47 The City/County of _____ shall encourage the development of pedestrian-oriented shopping areas within walking distance of high-density residential neighborhoods.

Note: Commercial development projects near existing residential areas require greater attention to design details to minimize neighborhood opposition.

Implementation Strategies:

Require residential development projects to designate neighborhood commercial areas where appropriate during the general plan amendment process. Re-zone vacant sites in existing high-density areas and areas being redeveloped.

Support organizations that work toward improving the commercial viability of the shopping area, such as local merchants associations and improvement districts.

Plan for city or neighborhood districts with distinct identities and which mesh with the urban fabric. See Figure 4-2.

Air Quality Benefits:

See Policy 42

Programs in Operation:

See Policy 36

Resources:

See Policy 36

Figure 4-2 Pedestrian-oriented Shopping Area in Santa Clara



Policy 48 The City/County of _____ shall protect pedestrian-oriented commercial areas from development that is incompatible in design, scale or use.

Implementation Strategy:

Utilize neighborhood commercial and major/regional commercial zone districts at appropriate locations.

Avoid designating competing commercial uses, especially in automobile oriented strip malls, within one mile of the pedestrian or transit-oriented commercial area.

Encourage all development to incorporate pedestrian- or transit-oriented design and work with the developer, transit agency, and other appropriate parties in the design and approval of development

Policy 49 The City/County of _____ shall discourage new regional auto-oriented commercial uses (such as volume discount stores, auto dealerships and large scale car repair) within areas designated as mixed-use, transit-oriented or pedestrian-oriented.

Implementation Strategy:

Modify the zoning ordinance to include an Auto-Oriented Commercial Zone District. Adopt a mixed-use or transit/pedestrian-oriented commercial zone district that defines the uses that are appropriate for these areas.

Note: Small- scale car repair businesses may be an appropriate neighborhood use in some areas since patrons may drop off their vehicles and walk home or use transit to get to work. The term "mixed-use" refers to urban design strategies that place compatible retail or office uses near to or sometimes in the same building as residential uses. An example is ground floor commercial with residences above. Another example is high or medium density residential adjacent to service retail, public amenities, and office uses.

Policy 50 The City/County of _____ shall encourage regional shopping malls/centers at sites capable of support by a full range of transportation options.

Note: For the purposes of this document, regional centers are retail uses that draw most of their customers on a community wide or regional basis as opposed to drawing them from the immediate surrounding neighborhoods.

Implementation Strategy:

Identify sites with access by freeway or major arterial and potential for light rail access. The site could be a regional transit hub and major pedestrian-oriented activity center to increase transit mode share.

Air Quality Benefits:

Policies 47 and 48 protect commercial areas intended to serve pedestrian and transit-oriented areas from inappropriate development. Allowing auto-oriented commercial uses and high traffic generating uses like regional shopping centers in neighborhood areas reduces the walkable destinations available to the residents. Air quality benefits are derived from the extent that residents would shop on foot or by bicycle when compared with the use of these modes in conventional areas. See Policy 35 for benefits of pedestrian and transit-oriented development.

Policy 49 encourages cities and counties to locate regional shopping centers at sites that can or will be well served by different transportation modes.

Regional malls and centers are major traffic generators. Every effort must be made to identify sites with good motor vehicle access to avoid traffic congestion and with good transit, bicycle, and pedestrian access to reduce total vehicle trips.

Programs in Operation:

See Policy 36

Resources:

See Policy 36

LAND USE: COMPACT DEVELOPMENT

The policies in this section represent several different approaches to achieving more compact development patterns. These approaches are used in many Valley general plans. The District strongly encourages cities and counties to promote compact development; however, we recognize that each community will have different concerns and may use different strategies.

Issues:

Sprawling, low-density development, and discontiguous development discourage the use of alternative transportation modes and increases travel distances. Infrastructure costs and most environmental impacts are less when development is more compact.

Objective 6b To plan development in a way that makes the most efficient use of the land and thereby causes the least possible impacts to the environment.

Policy 51 The City/County of _____ shall provide for an orderly outward expansion of new urban development so that it is contiguous with existing development, allows for the incremental expansion of infrastructure and public services, and minimizes impacts on the environment.

Implementation Strategies:

Identify areas that can be most efficiently served and cause the fewest environmental impacts and designate those areas for development during major general plan updates.

Ensure that new development finances the full cost of expanding public infrastructure and services to provide an economic incentive for incremental expansion.

Do not consider projects requiring general plan amendments contiguous when they are only adjacent to large vacant parcels designated for urban development.

Policy 52 The City/County of _____ shall encourage infill of vacant parcels.

Implementation Strategies:

Avoid designating more land for urban development when suitable infill parcels are available.

Support projects that infill vacant areas and areas contiguous on at least one side to a developed area.

Encourage growth to occur in and around activity centers, transportation nodes, underutilized infrastructure systems, and redevelopment areas.

Accommodate infill development within existing urban areas as a priority over urban expansion.

Work with landowners to re-designate vacant lands suitable for higher densities or for transit/pedestrian-oriented developments during general plan updates and periodic reviews.

Conduct a survey of vacant lands as part of the general plan update. Develop criteria for determining appropriate sites.

Policy 53 The City/County of _____ shall encourage infill and redevelopment projects within an urban area that will improve the effectiveness of the transit system and will not adversely affect existing development.

Implementation Strategies:

Encourage projects that increase pedestrian activity and mixed-uses.

Encourage commercial uses that are complimentary to urban employment centers.

Strategically locate high-density development to provide good transit access.

Policy 54 The City/County of _____ shall adopt a reasonable urban limit line/urban growth boundary and commit to providing public services only within the urban area.

Note: Urban limit lines and growth boundaries are controversial. If adopted with inadequate land to accommodate projected growth, they may make housing less affordable. Without the cooperation of neighboring jurisdictions, urban limit lines/growth boundaries will be ineffective in promoting compact development.

Implementation Strategy:

Identify potential growth areas and areas to be protected from development during general plans updates.

Work with developers of projects within and adjacent to the urban limit line to purchase development rights from the owner of the adjacent land outside the urban limit line.

Policy 55 The City/County of _____ shall expand public services incrementally to serve contiguous development and will discourage the formation of small sewer and water systems serving fringe urban development.

Implementation Strategy:

Require new developments to extend sewer and water lines from existing systems or to be in conformance with a master sewer and water plan.

Air Quality Benefits:

The ability of compact development to reduce air pollutant emissions is based on two assumptions. First, distances traveled will be lower in compact areas than for sprawling or leapfrog development. Second, by providing the right mix of uses in closer proximity, more trips will be accomplished by transit, on foot, or by bicycle.

The policies in this section use several different strategies to encourage compact development and to discourage discontiguous or sprawling development. The following describes the strategies for each policy or group of related policies.

Policy 50 and 54 promote incremental growth on the urban fringe. By discouraging discontiguous development, the urban fabric is maintained, trip distances are shorter, and infrastructure costs are minimized.

Policies 51 and 52 encourage the development of infill areas or redevelopment areas at densities that are high enough to support effective transit service. The strategic placement of higher densities can also provide frequently needed commercial services within walking distance for more people. The Institute of Transportation Engineers (ITE) suggests that residential densities of 7 to 8 dwelling units per acre and 8 to 20 million square feet of non-residential development are needed to support transit service of one bus every half hour, while residential densities greater than 9 dwelling units per acre and 35 to 50 million square feet of non-residential development are needed to support light rail transit with feeder buses (ARB 1993). Various studies have found that areas with higher overall densities tend to have higher rates of transit use and walking. The results of a study of five neighborhoods in California indicate that there is a significant connection between neighborhood characteristics and residents' travel behavior. In the mixed-use, higher density neighborhoods with good transit service, rates of walking and transit use were found to be three to four times higher than those of standard suburban areas. Residents of these mixed-use, higher density neighborhoods also drove for 10 to 30 percent fewer trips. Areas developed as transit or pedestrian-oriented developments can generate 21 percent less trips than traditional low-density residential development (1000 Friends 1993).

Policies 53, and 54 use local government's control of public services such as sewer and water systems as a tool to direct growth where it is best for air quality and for the community. Limiting sewer and water hookups has been widely used in California to limit growth. Although there is little interest in limiting growth in the San Joaquin Valley, there is widespread interest in directing growth away from prime farmland, and sensitive natural habitat. By defining the future urban areas with an urban limit line or by designating urban service areas that avoid prime farmland and sensitive natural habitats, cities can promote compact development. As part of the overall strategy, it is important for counties to avoid approving urban projects just outside the city's sphere of influence. This can undermine the integrity of the urban limit line and result in sprawling, inefficient development.

Most jurisdictions have adopted urban service areas. The problem is that the boundaries are frequently and routinely amended. The city or county should adopt and enforce strong policies that require certain conditions to be met before service areas may be expanded. Some cities and counties approve urban development projects outside the urban service area as long as the developer pays all costs of providing public services. Under some circumstances, developers are willing to pay the costs of extending services

rather long distances or will develop their own water and sewer systems to take advantage of less expensive land. Decision makers must look beyond just dollar costs. They must consider costs to air quality and to the fabric of the entire community when considering development projects for approval.

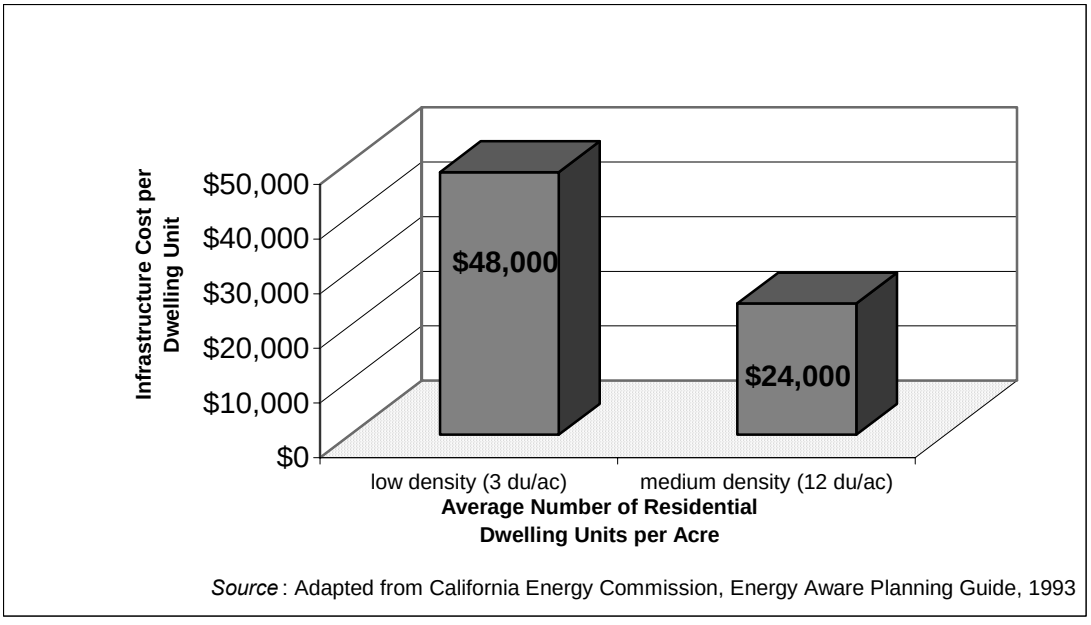
The air quality benefits of compact development cannot be looked at in isolation. It is one of the key components in developing pedestrian and transit-oriented communities. Compact development by itself will not significantly reduce vehicle trips and miles traveled if no transit facilities or pedestrian amenities exist. Conversely, effective transit facilities cannot be provided unless the community is developed in a compact manner. In addition, compact development can provide significant cost savings to local government and developers. Figure 4-3 shows the infrastructure costs in relation to residential densities. Units in areas with densities of 12 units per acres are substantially less costly to serve than residential densities of 3 units per acre.

Programs in Operation:

The City of Davis and the City of Woodland have adopted urban limit lines with a permanent band of open space between the two communities (Weissman 1992).

Contra Costa County has adopted an ordinance requiring 65 percent of the land in the county to be preserved for agriculture, open space, wetlands, parks and other non-urban uses. The ordinance is implemented by establishing urban limit lines beyond which there will be no growth (Weissman 1992).

Figure 4-3 Infrastructure costs and Residential Density



Source: Adapted from California Energy Commission, Energy Aware Planning Guide, 1993

Resources:

Land Use Strategies for More Livable Places, by Steve Weissman and Judy Corbett provides numerous examples of communities implementing strategies to promote compact, livable development.

LAND USE: SITE DESIGNS

For the purposes of this document, the term site design applies to individual subdivisions, multi-family developments, and commercial and industrial site plans. It also includes architectural features of buildings and landscapes.

Issues:

Most places in the Valley are designed to provide the most direct and convenient access by car at the exclusion of other modes of transportation. It is possible to design sites in ways that encourage less- polluting transportation modes and still support access by motor vehicle.

Objective 6c To promote site designs that encourage walking, cycling, and transit use.

Policy 56 The City/County of _____ shall encourage project sites designed to increase the convenience, safety and comfort of people using transit, walking or cycling.

Implementation Strategy:

Prepare Transit-Oriented Design (TOD) or Pedestrian-Oriented Design (POD) Guidelines to help staff planners and developers identify measures that can create a pedestrian and transit-friendly community.

Adopt air quality design standards as part of the zoning ordinance. Design standards must be general enough to apply under all but the most unusual circumstances to avoid the need for numerous zone variances and modifications. Some design measures like sidewalk widths and landscaping requirements are very appropriate for design standards. Design measures dealing with parking lot designs and building facades may be better left as guidelines because of site to site-to-site differences.

Policy 57 The City/County of _____ shall require an air quality/transportation design analysis for projects exceeding District CEQA significance thresholds.

Note: The design analysis should be prepared by a civil engineer, architect, or urban designer familiar with design measures that can reduce trips. It could be part of the traffic study normally required for large development projects.

This policy is intended to apply to large projects such as regional shopping centers and large subdivisions. Projects consistent with adopted city/county design guidelines or with a previously reviewed specific plan or community plan could be exempt.

Implementation Strategy:

Require the developer to submit a design analysis with the commercial site plan or subdivision map. The analysis could describe the design measures proposed for the site. The site plan or map could show the location and extent of any design features.
Some specific design features include:

- *Subdivision street and lot designs that promote pedestrian, bicycle, and transit use*
- *The location and type of transit improvements such as shelters and bus turn-outs*
- *Pedestrian access improvements and amenities (sidewalks, benches, water fountains, landscaping, etc.)*
- *Parking lot designs that enhance rather than detract from pedestrian access*
- *The location and type of bicycle improvements (bicycle parking/lockers, relation to bike paths or routes serving the site)*

Policy 58 The City/County of _____ shall review all subdivision street and lot designs, commercial site plans, and multi-family site plans to identify design changes that can improve access by transit, bicycle, and walking.

Note: This policy could apply to projects of all sizes. The review would be done by local planners or by a design review committee.

Figure 4-4 A canopy of trees encourages walking



Implementation Strategy:

Modify design review procedures to cover features that affect access and internal circulation by alternative transportation modes. Develop design guidelines that illustrate preferred designs.

Just a few examples of design measures that could be recommended during design review include:

- *Intra-development designs that incorporate integrated street patterns rather than the "pod" design, which limits ingress and egress options to the development and restricts traffic to a limited number of arterials*
- *Primary ground floor commercial building entrances must orient to plazas, parks, or pedestrian-oriented streets, not to interior blocks or parking lots*
- *Promote the use of trees and plants in travelway landscaping and residences*
- *Building facades should be varied and articulated to provide visual interest to pedestrians*
- *Street trees should be spaced no further than 30 feet on center in planter strips or tree wells. Tree species should be selected to create a unified image for the street and provide an effective canopy (see Figure 4-4)*
- *Sidewalks must provide an unobstructed path at least five feet wide. Larger sidewalk dimensions (up to 10 feet) are desirable in core commercial areas where pedestrian activity will be greatest*

Policy 59 The City/County of _____ shall require all development projects proposed within 2,000 feet of an existing or planned light rail transit, commuter rail, express bus, or transit corridor stop, to incorporate site design measures that enhance the efficiency of the transit system.

Implementation Strategy:

Identify all transit facilities on the Circulation Element Map. Analyze existing land use patterns and constraints around transit facilities to identify appropriate design measures.

Air Quality Benefits:

The design and layout of individual development projects is critical to the success of the entire land use, transportation, and air quality strategy. By providing destinations where people feel comfortable walking (as in Figure 4-5), where access to transit is convenient, and where bicycles can be safely ridden and parked, the effectiveness of all other programs to reduce trips and improve air quality will be much greater.

The first policy in this section states the overall requirement for future development to be designed to encourage walking, cycling, and transit use. The other policies provide the methods and situations where the design requirements would apply. Policy 56 establishes size and type thresholds for design review. Policy 57 promotes an internal review of plans to identify features that can enhance the use of alternative modes. Policy 58 identifies sites where the city or county would require special transit-oriented design criteria.

One source of evidence for the impact of urban design on trip generation and VMT is provided by a study that compared VMT in different Bay Area communities (Parker 1995). The study used actual VMT measurements as well as a 1981 regional transportation survey. One overall finding was that a doubling in overall density is generally associated with 20 to 30 percent fewer VMT per household (Parker 1995). Some of the areas with higher densities also provided frequently used commercial services within walking distance, eliminating many of these vehicle trips.

Figure 4-5 Pedestrian-oriented Neighborhood



The Land Use, Transportation, and Air Quality (LUTRAQ) study in the Portland, Oregon metropolitan area

estimates that individual transit-oriented developments will generate 21 percent fewer trips than conventional single family developments and commercial uses (1000 Friends 1993). However, the amount of trip reduction directly attributable to site design measures was not separately addressed.

Programs in Operation:

The cities of San Diego, Sacramento, and Portland, Oregon have all prepared design guidelines that encourage and enhance transit, pedestrian, and bicycle travel. These guidelines incorporate "neo-traditional" design principles that take the best planning practices from 50 to 100 years ago and apply them to new development.

Village Homes in Davis, California provides an example of a bicycle and pedestrian-oriented subdivision. Street access is narrow and somewhat limited and bicycle and pedestrian paths offer the shortest routes to neighborhood destinations such as the school and community center. Many of the houses face bike paths. This provides a sense of safety for the riders and keeps the public spaces in view of the community to prevent crime and vandalism (Weissman 1992). Figure 4-6 illustrates this concept.

Figure 4-6 Village Homes, Davis, California
Source: Local Government Commission



Resources:

Planning and Design for Transit, March 1993, Tri-County Metropolitan Transit District of Oregon (TRI-MET), 4012 S.E. 17th Avenue, Portland, Oregon 97202. This 200-page document provides a comprehensive guide to designs and land use patterns supportive of transit. You may order copies by accessing <http://www.trimet.org/>.

Energy Aware Planning Guide, January 1993, California Energy Commission. This document contains extensive sections on design measures to reduce vehicle trips, miles traveled, and energy consumption. Available at <http://www.energy.ca.gov/reports/energy_aware_guide.html>.

The City of San Diego has adopted Transit-Oriented Development Design Guidelines. This document, prepared by Calthorpe Associates, provides thorough discussions and illustrations of design techniques that encourage transit use, walking and bicycling.

SUGGESTED GOALS AND POLICIES FOR CIRCULATION ELEMENTS

The goals and policies in this section are most appropriate for Circulation Elements of the general plan. They provide ways to plan for the transportation needs of the community that can improve air quality.

Principles for Planning Transportation Systems for Improved Air Quality

The Air District strongly encourages cities and counties of the San Joaquin Valley to:

- Plan and construct an innovative, multi-modal transportation system to meet mobility needs and improve air quality
- Plan and construct transit improvements at appropriate locations
- Plan and construct a comprehensive system of bikeways and pedestrian paths
- Determine the feasibility of light rail or other fixed guideway systems and protect appropriate right of ways
- Work to improve intercity and commuter rail service in the Valley
- Promote the Valley route for the high speed rail corridor

Note: The District recognizes that the type of transportation system is dependent on the size of the community. The above principles are directed at communities currently or projected to be of adequate size to support these systems.

TRANSPORTATION INFRASTRUCTURE

Issues:

The transportation infrastructure developed in the San Joaquin Valley supports the automobile at the expense of other modes of transportation. Placing emphasis on transit, bicycling, and pedestrian infrastructure is vital to relieve pressure from the traditional roadway system and improve air quality. The existing transit systems in the Valley serve only small numbers of commuters (approximately one percent of work trips). Transit systems must be improved to provide shorter waits between buses, competitive trip speeds and better network coverage. In the long term, transit systems should expand beyond buses to light rail or even personal rapid transit systems to accommodate the transportation needs of the projected 4.96 million San

Joaquin Valley inhabitants (by the year 2020) (ARB Population and Vehicle Trends Report 2004).

Objective 6d To develop innovative transportation systems that incorporate alternative transportation modes into the system designs.

Policy 60 The City/County of _____ shall plan for a multi-modal transportation system that meets the mobility needs of the community and improves air quality.

Implementation Strategies:

Ensure that updates to the Circulation Element and submittals of regional transportation improvement projects to the Regional Transportation Planning Agency reflect designs and facilities that support a multi-modal system.

Coordinate with transportation providers, planners, agencies, and organizations to develop a complete range of innovative, practicable and cost-effective options. Some options to consider are:

- *Strategic placement and orientation of new transportation or improved facilities*
- *Flexible zoning such as Transportation Overlay Zones to allow for multi-modal coordination*
- *Services using smaller, efficient vehicles to serve low-density areas (jitneys can run on fixed or flexible routes and can use vehicles similar to airport shuttles or smaller)*
- *Personal Rapid Transit (PRT) systems for fixed route systems connecting large activity centers*
- *High Occupancy Vehicle (HOV) lanes or bus only lanes and transit-ways*
- *Congestion pricing measures such as toll roads with electronic toll collection and billing*

Policy 61 The City/County of _____ shall vigorously pursue and use state and federal funds earmarked for bicycle and transit improvements.

Implementation Strategy:

Ensure that Regional Transportation Improvement Plans include alternative transportation mode projects best suited to the community.

Provide information resources, referrals, and guidance on state and federal funding for alternative transportation improvements to developers, employers, and community involvement organizations.

Policy 62 The City/County of _____ shall encourage the consolidation of transit services within the metropolitan area to maximize the efficiency of transit services while minimizing costs.

Note: This policy would also apply to small transit providers serving special groups like seniors or veterans and to adjacent or nearby cities that act as a single metropolitan area. Consolidating these services can increase ridership per vehicle and reduce miles traveled.

Implementation Strategy:

Include transit consolidation plans in Regional Transportation Plans.

Policy 63 The City/County of _____ shall ensure to the extent feasible that pedestrian, bicycle, and automobile connections are maintained in existing neighborhoods affected by transportation and other development projects.

Implementation Strategy:

Construct pedestrian bridges and under crossings where appropriate.

Ensure vehicle overpasses and underpasses are constructed at appropriate locations to provide reasonable connections between services and residences.

Include maintenance or improvement requirements for pedestrian, bicycle, and automobile connections as part of the development standards of the Zoning Ordinance or Subdivision Ordinance.

Include the maintenance or modification of existing pedestrian, bicycle, and automobile connections as a part of Building Permit requirements.

Air Quality Benefits:

Providing an innovative, multi-modal transportation system benefits air quality in two ways. First, by providing fast, safe, and convenient alternatives to the personal automobile, the number of vehicle trips would ill be reduced. Second, because these options increase the efficiency of the entire system, congestion related emissions would be reduced or avoided.

Policy 60 is an overall commitment to developing an efficient transportation system. The economic vitality and future air quality of the Valley will be determined in part by current transportation planning efforts. With the federal ISTEA and state congestion management legislation, transportation plans must support alternatives to the single-occupant automobile. In addition, most jurisdictions are unable to identify funding sources to address all projected road and highway capacity needs. This means that local jurisdictions must identify ways of increasing the capacity of existing roadways and ways of reducing travel demand in order to avoid gridlock and degraded air quality.

Policy 61 states a community's commitment to use available funding for transit, bicycle and pedestrian projects. Because of matching funds requirements for many state and federal transportation funding programs, some jurisdictions do not pursue these sources. The conformity requirements of the federal FCAA amendments and Intermodal Surface Transportation Efficiency Act (ISTEA) may force jurisdictions to spend their transit and bicycle money in order to qualify for highway money. The tendency so far has been for cities and counties to spend funds on congestion relieving roadway improvements such as signalization. Without a change in funding priorities to support alternative modes of transportation, significant changes in mode shares are unlikely.

Policy 62 provides a method to increase the effectiveness of transit resources already available. By consolidating services, it is possible to avoid duplication routes and to increase ridership per vehicle.

Policy 63 is intended to address the need for both retention and creation of pedestrian, bicycle, and automobile connections between areas divided by large-scale transportation projects, or implementation of non-transportation focused development projects.

The Sacramento Regional Transit District’s multi-modal transportation system includes bus routes and light rail that covers a 418 square-mile service area and is serviced by 76 electrically-powered light rail vehicles, 258 buses powered by compressed natural gas, and 17 shuttle vans. There are bike racks on the buses and the trains, and 15 light rail stations have bike lockers (SRTD 2005). San Francisco’s system is also multi-modal.

TRANSPORTATION INFRASTRUCTURE: TRANSIT

Policy 64 The City/County of _____ shall require transit improvements at sites deemed appropriate and necessary by the Transportation Department and the transit provider and consistent with long-range transit plans.

Note: Transit improvements should be considered the same as other roadway improvements such as curb, gutter, sidewalks, etc., now provided by developers. Transit improvements should be viewed as an extension of roadway improvements, especially in light of the multi-modal emphasis of all new transportation plans.

Implementation Strategy:

Identify transit improvement needs during CEQA review. Require dedication of sites and improvements as CEQA mitigation. Include dedication requirement as a condition of approval of the subdivision map.

Policy 65 The City/County of _____ shall work with Caltrans and transit providers to identify park and ride sites with convenient access to public transit.

Implementation Strategy:

Identify appropriate sites during general plan updates, and review of specific plans and major general plan amendments.

Policy 66 The City/County of _____ shall design all arterial and collector streets planned as transit routes to allow the efficient operation of public transit.

Implementation Strategy:

Work with transit providers to develop a comprehensive long range transit plan that is parallel with the general plan. Revise street and road design standards to include bus turn-out designs and passenger loading area designs.

Air Quality Benefits:

The policies in this section deal exclusively with transit infrastructure in support of bus service. The policies support roadway improvements that

increase the speed and safety of bus operations and they support passenger loading facilities that improve the convenience and comfort of people waiting for the bus. Both of these actions will tend to increase transit ridership, thereby reducing overall vehicle trips and miles traveled.

A study conducted by Shapiro, Hassett, and Arnold (2002) found that moving a person a given distance by public transportation produces about five percent as much carbon dioxide, about eight percent as much VOCs, and about half as much NOx and CO_2 as moving a person the same distance by private vehicle.

Policy 64 provides a mechanism for cities and counties to reserve the road right of way and land needed for bus turnouts and to construct transit facilities. Bus turnouts remove the buses from the travel lane so that other vehicle traffic is not impeded. This can minimize congestion related emissions. By planning bus turnouts in advance, surrounding development can be designed to benefit from proximity to transit instead of being negatively impacted by the location of the facilities.

Policy 65 encourages cities and counties to locate park and ride lots in places with convenient access to transit. Convenient access is critical in influencing people to choose transit as a commute option. The transit loading area should be close to the park and ride lot and should provide pedestrian amenities to increase the comfort of people waiting.

Park and ride lots that are part of a multi-modal transportation hub can increase the level of activity at the site and improve security. Multi-modal hubs provide better connections with destinations within the community and increase the possibility and probability of using transit.

Park and ride lots can be effective in reducing emissions; however, the trips from home to the park and ride lot and back generate emissions that must be accounted for. Because of the problem of cold start emissions, vehicles produce much of their pollution towards the beginning of the trip (see Section III). Personal vehicle trips avoided by using park and ride must be longer trips to offset the cold start emissions that are still occurring on the commute to the park and ride lot. Growing numbers of people are commuting long distances between Valley cities and to destinations outside the Valley. Park and ride lots can reduce the number of personal vehicles used for long commute trips.

One must also consider the level of congestion en route to the ultimate destination when determining if park and ride lots will benefit air quality. Areas with high levels of congestion may have localized carbon monoxide (CO) problems. It may be beneficial to provide park and ride lots in these areas even though the two legs of the trip may create a net emissions increase for other pollutants such as ROG and NOx.

Policy 66 requires arterial and collector streets to be designed to accommodate buses. These design measures could include bus only lanes, driver actuated signals, bus turnouts, and bus loading areas. These measures allow buses to improve their average speeds and to reduce conflicts with automobile traffic. Buses in most Valley locations have a large time disadvantage compared to automobile travel. Measures to reduce this disparity will improve transit's viability.

These policies are only components of a comprehensive transit-oriented strategy. Their effectiveness in reducing vehicle trips and miles traveled is dependent on the level of commitment and success in implementing a transit-oriented development strategy. A study conducted in the Portland, Oregon metropolitan area estimates that individual transit-oriented developments will generate 5 percent fewer vehicle trips than conventional single-family developments and commercial uses (Cambridge Systematics et al. 1996).

Programs in Operation:

The City of Portland, Oregon has developed one of the most accommodating and efficient transit systems in the country. Downtown Portland combines frequent service, convenient bus stops and dedicated bus lanes to achieve high transit ridership.

The Southern California Association of Governments has information and maps of park and ride facilities in Los Angeles, Ventura, Riverside, Orange County, and San Bernardino.

Resources:

Southern California Association of Governments. <http://www.scag.ca.gov/parkride.htm>.

See Resources section for Policies 57 through 60.

TRANSPORTATION INFRASTRUCTURE: BICYCLE AND PEDESTRIAN FACILITIES

Policy 67 The City/County of _____ shall ensure that a comprehensive system of bikeways and pedestrian paths is planned and constructed in accordance with an adopted City/County plan.

Implementation Strategies:

To maximize bicycle use the following actions may be included in street design standards, subdivision ordinances or zoning ordinances:

- *The bikeways should be part of a network that connects major destination points within the community*
- *Provide separate bike paths in areas where motor vehicle speed or volume make on-street bike lanes unsafe or unpleasant to use*
- *Using lower speed limits will enable on-roads cyclists to share the roads with motorists*
- *Provide automatic traffic signal actuators imbedded in the roadway or provide manual signal actuators where cyclists may reach them without leaving the roadway*
- *Provide bicycle paths along greenbelts, linear parks, public easements, and drainage reserved as open space*
- *Provide bicycle and pedestrian bridge crossings for freeways and waterways*
- *Provide adequate paved shoulder on arterial and collectors to keep cyclists and motorist separate*
- *Do not allow on street parking on roadways designated with bike lanes whenever possible*

On-site improvements that can increase bicycle use include:

- *Provide bike racks or enclosed and locked bicycle storage at major activity centers and office and commercial establishments*
- *Provide employee showers, lockers, and dressing areas at employment sites*

Policy 68 The City/County of _____ shall ensure that regional and commuter bikeways are extended to serve new development consistent with the adopted bikeway plan.

Implementation Strategy:

Identify all planned and existing regional and commuter bikeways in a comprehensive bikeways plan. Use targeted state and federal funds along with developer contributions to fund the system.

Policy 69 The City/County of _____ shall ensure that upgrades to existing roads (widening, curb and gutter, etc.) include

bicycle and pedestrian improvements in their plans and implementation where appropriate.

Implementation Strategy:

Through zoning or other means, require bicycle lanes on larger streets.

Through zoning or other means, require pedestrian pathways between existing developments fitting certain criteria to existing and planned transit or multimodal facilities.

Compare Public Works/Roads Department's improvement plans with bikeways plans and ensure they match.

Policy 70 The City/County of _____ shall require new major activity centers, office and commercial development to provide secure bicycle storage and parking facilities.

Note: Consider the type of use when establishing bicycle parking standards. Some uses have limited potential for bicycle use and should have lower parking requirements.

Implementation Strategy:

Change the Zoning Ordinance Special Development Standards to require bicycle storage facilities. Require bicycle facilities as CEQA mitigation measures.

Consider reducing motor vehicle parking standards to acknowledge development with good multi-modal access and facilities.

Policy 71 The City/County of _____ shall preserve abandoned railroad right of ways with no potential for use as light rail lines for use as bikeways and pedestrian paths when feasible.

Implementation Strategy:

Identify potential paths during general plan updates and when the railroad proposes to abandon their right of way.

Air Quality Benefits:

Bicycling is the most efficient form of transportation ever devised. The amount of energy consumed per mile is less than any form of locomotion, including walking. The air quality benefits of bicycling are obvious. The bicycle is a zero exhaust vehicle.

The policies in this section attempt to create "bicycle-friendly" transportation infrastructure. The basic premise underlying these policies is that providing a safe, interconnected system of bikeways and routes will result in greater bicycle use. In Davis, California, which is known as the most bicycle-oriented city in the State, more than 80% of all collector and arterial streets within the city have bike lanes or bike paths (City of Davis 2001).

Although many Valley communities have systems of bikeways and bike lanes, their current use is limited; bicycling accounted for approximately 0.8% of work trips in the City of Fresno in 2000 (2000 Census). The most important factors limiting greater use are lack of continuity and safety considerations. Bicycle routes usually are not continuous. Many routes have unsafe bottlenecks at intersections to accommodate left and right turn lanes. Some routes narrow to one foot wide in places or periodically disappear and reappear. Many traffic signals cannot be actuated by bicyclists without leaving the roadway to press the pedestrian crossing actuator. All but the most serious bicyclists are discouraged by these conditions.

Policy 67 requires the city or county to plan and construct a comprehensive bicycle system. This will be difficult in developed areas, but is very practical for new areas. Nearly all cities in the Valley predict rapid growth. If long-range transportation and land use plans include bicycle facilities, much larger mode shares for bicycles are feasible as build out progresses.

Policy 68 provides a commitment to extend bikeways to serve new development. This commitment must be followed up by developing funding sources to maintain the integrity of the bikeways system.

Roads that are good bicycle routes are frequently made unusable when the road is widened or when intersections are modified. Policy 69 encourages cities and counties to design roadway improvements that include bicycle use. This is where adequate long range transportation planning is critical. Roadways should be planned to their ultimate width from the start. Retrofitting to add improvements invariably results in less than ideal driving conditions and less safe bicycling.

Policy 70 concentrates on making the end of the bicycle trip more convenient. Providing a safe place to lock bicycles eliminates one more reason that people choose not to ride.

Under some conditions, separate bikeways are preferable to sharing the road with motor vehicles. Policy 71 encourages the use of abandoned rail right of ways to provide a low cost place to construct separate bikeways. Ideally, the right of way should connect with commuter destinations or other segments of the comprehensive bikeways system.

The policies in this section are appropriate for all sizes of cities, but are especially effective for small and medium-sized cities. Smaller cities have shorter travel distances to a greater number of destinations, and usually have less traffic and congestion than large cities. This increases bicycle safety.

A rough calculation of the valley-wide emission reduction potential for ROG and CO for just a one percent increase in bicycling mode share for all trips produces the following results:

- ROG - 4.77 tons/day
- CO - 22.27 tons/day

These calculations are based on the 2001 Base Year Inventories for ROG and CO for the San Joaquin Valley (California Air Resources Board 2003). The calculations assume that a one percent increase in the bicycle mode share corresponds to a one percent decrease in on-road mobile emissions.

Programs in Operation:

The City of Davis fully integrates bicycles into the transportation system. The City offers an extensive system of bike lanes, bicycle parking facilities, and slow speed limits on most city streets. According to the 2000 Census, 15% of commuters in the City of Davis bicycle.

The City of Visalia adopted a comprehensive bikeways plan. The plan calls for expansion of the current system of bikeways and provides standards for constructing bike facilities. Visalia provides an example of what a medium-sized city can do to encourage bicycling.

Resources:

Guide to Bicycle Project and Program Funding in California Second Edition, February 2002; California Bicycle Coalition and Planning and the Conservation League Foundation. <http://www.calbike.org/fed.htm>.

Bicycle Friendly Cities: Key Ingredients for Success and Selecting and Designating Bicycle Routes: A Handbook; National Center for Bicycling and Walking, 1506 21st St. NW, Suite 200, Washington DC20036.

A Citizen's Guide to Transportation Policy and Planning 2002; 1000 Friends of Oregon and the Oregon Transportation Reform Advocates Network, 534 SW Third Avenue, Suite 300, Portland, OR 97234. <www.bikewalk.org>.

City of Davis Comprehensive Bicycle Plan. City of Davis. 2001. <http://www.city.davis.ca.us/pw/pdfs/01bikeplan.pdf>.

Guide to the Development of Bicycle Facilities, 1999; American Association of State Highway and Transportation Officials (AASHTO), 444 N. Capitol St, NW, Suite 249, Washington, DC 20001.

National Center for Biking and Walking has information on how to help create neighborhoods and communities where people walk and bicycle trough land use planning, safety, and more. <www.bikewalk.org>

Rails Trails: An Acquisition and Organizing Manual for Converting Rails into Trails; Rails-to-Trails Conservancy, 1400 16th St NW, Washington, DC 20036. <www.railtrails.org>.

A Guide to Transportation Enhancements, June 1999; Rails to Trails Coalition and the Federal Highway Administration, 400 Seventh St SW HEPN-50, Washington DC 20590. <www.fhwa.dot.gov>.

TRANSPORTATION INFRASTRUCTURE: LIGHT RAIL/COMMUTER RAIL

Policy 72 The City/County of _____ shall identify potential light rail corridors during major general plan updates and take action to protect the right of way from incompatible development.

Implementation Strategy:

Work with Caltrans and the Regional Transportation Planning Agency to prepare a comprehensive light rail study. Identify the best routes and develop a community consensus for those routes. Ensure that the general plan designates densities and land use patterns that make light rail feasible.

Policy 73 The City/County of _____ shall preserve specific existing railroad right of ways that have the potential to be used as light rail lines.

Implementation Strategy:

Identify light rail routes during general plan updates and during Regional Transportation Plan preparation.

Policy 74 The City/County of _____ shall support the use of suitable freeway and expressway right of ways for light rail.

Implementation Strategy:

Plan light rail routes in the Circulation Element and Regional Transportation Improvement Plans.

Policy 75 The City/County of _____ shall plan the area around new commuter and mainline rail stations to provide convenient and safe pedestrian and bicycle access, and connections to the transit system.

Implementation Strategy:

Identify potential rail stations during general plan updates and designate the surrounding area for pedestrian or transit-oriented development.

Air Quality Benefits:

New rail systems have a smooth, quiet ride and relatively high average speeds. High speed rail systems, one of which is being considered to run through the Valley, can rival air travel for speed and convenience. Several cities in the Valley are considering light rail in their long range transportation plans. The air quality benefits of rail depend on the extent to which they reduce motor vehicles trips and miles traveled.

Implementing the policies in this section will result in the conditions needed to make light rail feasible in the Valley and will allow the most effective use of the planned high speed rail system. A well-used light rail or high speed commuter rail system can absorb a large number of vehicle trips that would otherwise be made by more polluting motor vehicles. Light rail in heavily congested corridors can help reduce congestion related emissions and also can reduce trips when people walk or bicycle to the transit station. High speed rail targets long distance commuters, tourists and business travelers who would normally travel by private car or by air. Rail travel uses less energy and emits fewer pollutants per passenger than cars.

Policies 72, 73, and 74 require cities and counties to identify and preserve light rail corridors. By identifying the corridors early, the odds of actual construction of the system are greatly improved. This is because of two factors that impact feasibility. First, by identifying the corridor you can plan the land uses along the corridor to provide a maximum number of people within walking distance of the transit stations. Second, it is much easier to design a roadway that reserves a portion for the rail line instead of retrofitting a light rail line on an existing street.

Policy 75 promotes multi-modal access to potential rail stations. People arriving at the station by bus, bicycle, or walking avoid a cold start and the running emissions that would have occurred had they driven their cars to the stations.

Programs in Operation:

The cities of Los Angeles, San Diego, San Jose, and Sacramento have light rail systems that have exceeded ridership goals and have proven to be a viable commute alternative for many people.

In November 2004, Denver voters approved a $4.7 billion expansion of the city's rail system; the largest such project in the country, the measure will add 120 (Paulson 2005).

Resources:

Sacramento Regional Transit, PO Box 2110, Sacramento, CA 95812-2110. <www.sacrt.com>.

San Diego Association of Governments. <www.sandag.org>.

Santa Clara Valley Transportation Authority. <http://www.vta.org/services/light_rail_overview.html>.

California Rail News published by the California Rail Foundation and the Train Riders Association of California, 926 J Street, Suite 612, Sacramento, CA 95814. This publication discusses issues facing all forms of transit. <http://www.calrailnews.com/>.

ANALYSIS OF AIR QUALITY BENEFITS OF IMPLEMENTING AIR QUALITY GOALS AND POLICIES

An extensive review of the literature on the effect of land use decisions on transportation and air quality accomplished for this project found a broad consensus that significant long-term emissions reductions are possible by

changing our development practices. The best evidence comes from studies that compare differences in travel behavior in various types of developed areas. These studies have clearly shown that land use patterns favorable to walking, bicycling, and transit use produce less vehicle trips and less emissions. The studies do their best to identify variables responsible for the differences, but it is not possible to develop a precise formula that will apply to any every site anywhere. The emission reduction estimates quoted in this document should be viewed as what is possible. Individual cities and counties may achieve higher or lower reductions depending on local circumstances. A discussion of the travel and trip reduction studies we found most useful and convincing is provided below.

Results of the Literature Search

Perhaps the most widely used source of trip statistics is the Institute of Transportation Engineers (ITE), Trip Generation Manual. The trip generation factors provided in this manual are used in many transportation models, and also in models predicting mobile source air pollutant emissions from development projects. The manual uses travel surveys conducted nationwide to develop trip generation estimates. The ITE manual (6th Edition) lists the single family residential rate as 10 trips per day, and the rate for high density residences as 6 trips per day. This is a 40 percent difference in trips between single family residences and high density residences such as apartments. The surveys do not address the characteristics of sites studied to determine why people living in apartments make less trips than people living in single-family residences.

More detailed travel survey information is available from the U.S. Department of Transportation, *Our Nation's 1995 Nationwide Personal Transportation Study Early Results Report*, *November 1996 Summary of Travel Trends*, *1995 Nationwide Personal Transportation Survey*, and the *2001 National Household Travel Survey*, which is available at <http://nhts.ornl.gov/2001/index.shtml>. These studies examine travel behaviors and factors influencing transit use, such as distance to public transit in influencing transit use. These study and summary documents showed that 10.3 percent of people living within 1/4 mile of transit used public transit to get to work. Only 3.8 percent of people living between 1/4 and 2 miles of a transit station used transit and less than 1 percent living more than 2 miles away used transit to get to work. This information supports the concept of locating the maximum number of people close to transit.

Another widely used source of travel behavior information is the Bay Area Travel Survey published by the Metropolitan Transportation Commission. Studies conducted in California, New York, Washington, Canada, Australia, Europe, and Asia have found that as density increases, the average annual rate of vehicle travel decreases, with each doubling of density resulting in a

reduction of 25 to 30 percent (Cervero 1994, Holtclaw 1990, Holtzclaw 1994, Deakin, Harvey & Skkabordonis 1981, Newman and Kenworthy 1989 in California Air Resources Board 1997).

In an October 2004 memorandum on URBEMIS 2002 mitigation measures, Nelson\Nygaard Consulting summarized literature linking residential density and travel behavior. They found that there is a significant, quantifiable relationship between residential density and automobile use, with a threshold value of 25-30 units per acre below which the travel impacts of increased density are particularly large (Nelson\Nygaard 2004). They also found that higher densities are most beneficial to transit ridership in mixed-use areas.

Effectiveness of Air Quality Goals and Policies

A sub-consultant for this project, TJKM Transportation Consultants, analyzed the literature to arrive at potential reductions in vehicle trips, vehicle miles, and vehicle hours in the types of communities found in the San Joaquin Valley. The consultant relied heavily on studies of the effectiveness of transportation control measures (TCMs). TCMs are defined in the CCAA as "any strategy to reduce vehicle trips, vehicle miles traveled, vehicle idling, or traffic congestion." This broad definition would include the land use measures promoted by the policies of this document.

TCMs are normally thought to apply to existing development rather than new development; however, the land use pattern and transportation infrastructure can enhance the effectiveness of TCMs. The consultant used a 20 to 25 year planning horizon to estimate the long-term effectiveness of TCMs. With population predicted to nearly double in the San Joaquin Valley during that period, close to 50 percent of the Valley's developed land could be developed in ways that support TCMs.

The results of this analysis are presented in Table 4-2. The table provides a range of effectiveness for each measure in each of five different community types found in the San Joaquin Valley. The most important categories for this discussion are Transportation Infrastructure Changes and Urban Design. The consultant predicts trip reductions from 0 to 2 percent and VMT reductions of 0 to 2.5 percent for transportation infrastructure changes. Urban design measures can achieve reductions of 0 to 15 percent. The percentage reductions for each category in this table are not always additive, but rather are "either-or" levels of effectiveness.

A more detailed analysis of TCM effectiveness in the San Joaquin Valley was recently completed. The Councils of Government from the San Joaquin Valley led an effort to quantify the benefits of TCMs proposed for implementation in the Valley. The TCMs are being proposed in order to comply with congestion management legislation and with the District's various

Table 4-2 Effectiveness of TCMs by Area Type – Percent Reductions

Transportation Control Measures	Small Agricultural Town	Diversified Agricultural Towns		Urban/Suburb	
		Bedroom	Non-Bedroom	Bedroom	Non-Bedroom
TRANSPORTATION INFRASTRUCTURE CHANGES					
Traffic Flow Improvements[2]	0.0	0.0	0.0	0.0	0.0
Bicycling Program	0.0 - 0.5	0.0 - 0.5	0.0 - 0.5	0.0 - 0.5	0.5 - 1.0
Park and Ride Lots: Fringe Area	N.A	N.A	Minimal	N.A	trips: 0.5-1.0
Park and Ride Lots: Suburban Area		trips: 0.5 - 1.5		trips: 0.5 - 1.5	trips: 0.5-1.5
HOV lanes	Generally Applicable only in Inter-regional corridors				
TRANSIT INFRASTRUCTURE					
Rapid Rail/ Support Facilities	N.A	N.A	N.A	N.A	0.0 - 1.0
Public Transit	<0.5	<0.5	<0.5	<0.5	0.5 - 2.0
Passenger Rail/ Support Facilities	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0	1.0 - 2.0
PRIVATE SECTOR -BASED					
Non-employer Trip Reduction Program	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0
Fleet Operators Program[3]	0.0	0.0	0.0	0.0	0.0
Employee Focus					
Rideshare Program	0.0 - 3.0	0.0 - 4.0	0.0 - 4.0	0.0 - 4.0	0.5 – 5.0
Trip Reduction Program (Mandatory)	1.0 - 5.0	1.0-5.0	1.0 - 5.0	1.0 - 5.0	2.5 – 7.5
Telecommunication	1.0 - 5.0	3.0 – 6.0	2.0 – 5.0	3.0 - 6.0	4.0 – 8.0
Alternative Work Schedules	2.5 - 7.5	4.0 - 8.0	2.5 - 7.5	4.0 - 8.0	5.0 – 10.0
PARKING/ROADWAY MANAGEMENT/PRICING					
Parking Management: Supply Limit	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0	0.0 - 1.0	1.0 - 5.0
Parking Management: Increased Price	0.0 - 5.0	0.0 - 5.0	0.0 - 5.0	0.0 – 5.0	2.5 - 7.5
Market-based Trip Reduction Program	1.0 - 3.0	2.5 - 7.5	2.5 - 7.5	2.5 – 7.5	5.0 – 10.0
URBAN DESIGN					
Job/Housing Balance	VMT: 0.0 - 5.0	VMT: 2.5 - 7.5	VMT: 2.5 - 7.5	VMT: 2.5 - 7.5	VMT: 2.5 - 7.5
Urban Villages	0.0 - 10.0	5.0 - 15.0	5.0 - 15.0	5.0 - 15.0	5.0 - 15.0

[1] Range of potential percent reduction in locally generated VMT and trip (per capita) – assumes 20-25 year planning horizon.

[2] Air quality Improvements stem from travel time improvement.

[3] Air quality improvements stem from use of alternative fuels.

plans. The reductions presented in Table 4-2 are similar to those predicted by the study.

A review was conducted of various TOD projects within the State to identify representative TOD projects that may be built within the SJVAB. Potential emissions and emission reductions resulting directly from the incorporation of TOD features into the project design were then calculated using the URBEMIS2002 model.

URBEMIS is a computer program that can be used to estimate emissions associated with land use development projects in California, such as residential neighborhoods, shopping centers, office buildings; area sources such as gas appliances, wood stoves, fireplaces and landscape maintenance equipment; and construction projects. URBEMIS stands for "Urban Emissions Model." It is a free software program maintained by California Air Districts, and it is available online at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm>.

URBEMIS2002 uses the Institute of Transportation Engineers' Trip Generation Manual version 6.0 along with ARB's vehicle emissions model, EMFAC2002, to calculate motor vehicle emissions. Other components can be used to estimate:

- Construction emissions associated with new development and redevelopment
- Air quality benefits of construction-related mitigation measures
- Emissions from "area sources," such as gas appliances, wood stoves, fireplaces, and landscape maintenance equipment
- Screening level analysis
- Air quality benefits of mitigation measures for area sources

URBEMIS2002 includes several other capabilities related to travel and vehicle emissions. It provides an option to minimize the "double-counting" of trips in mixed-use projects that include residential and non-residential land uses. It also standardizes the estimation of "pass-by" trips (stops made on the way to other destinations). The "Mobile Source Mitigation Component" allows users to estimate the potential vehicle travel and emission reduction benefits of a number of land use and transportation-related strategies, both within the project site and the surrounding area including: pedestrian and bicycle features; public transit facilities and service; the design and mix of land uses; on-site services; and other measures, such as telecommuting and alternative work schedules.

URBEMIS is periodically upgraded to address new information and data.

Table 4-3 summarizes the results of URBEMIS modeling. The data presented in Table 4-3 are development-specific emissions for TOD and non-TOD developments, as well as emissions from a typical single family suburban residence. The emissions reductions resulting from the incorporation of TOD features into the project design are also indicated. The emissions data presented in Table 4-3 are daily emissions per residence. When these emissions are applied to a large development project, emissions reductions can be substantial. For example, the daily emission reduction for NOx generated from a project similar to Moffet Park in Sunnyvale is 26 pounds per day per 100 residential units.

Table 4-3 Summary of Emissions Reductions per 100 Housing Units from Various TOD Projects

TOD Project	ROG (lbs./day)	NO_X (lbs./day)	CO (lbs./day)	PM10 (lbs./day)
Typical Suburban Development	**18**	**22**	**229**	**17**
Aspen Neighborhood, West Davis				
Non-TOD design emissions	8	8	93	6
TOD design emissions	7	7	74	5
Emissions reductions	**1**	**1**	**19**	**1**
Moffet Park, Sunnyvale				
Non-TOD design emissions	14	15	162	12
TOD design emissions	12	12	136	9
Emissions reductions	**2**	**3**	**26**	**3**
Hollywood/Highland, Los Angeles				
Non-TOD design emissions	24	30	324	23
TOD design emissions	21	23	259	18
Emissions reductions	**3**	**7**	**65**	**5**
Rio Vista West, San Diego				
Non-TOD design emissions	9	11	110	8
TOD design emissions	8	8	90	6
Emissions reductions	**1**	**3**	**20**	**2**

County and City Emissions Inventories

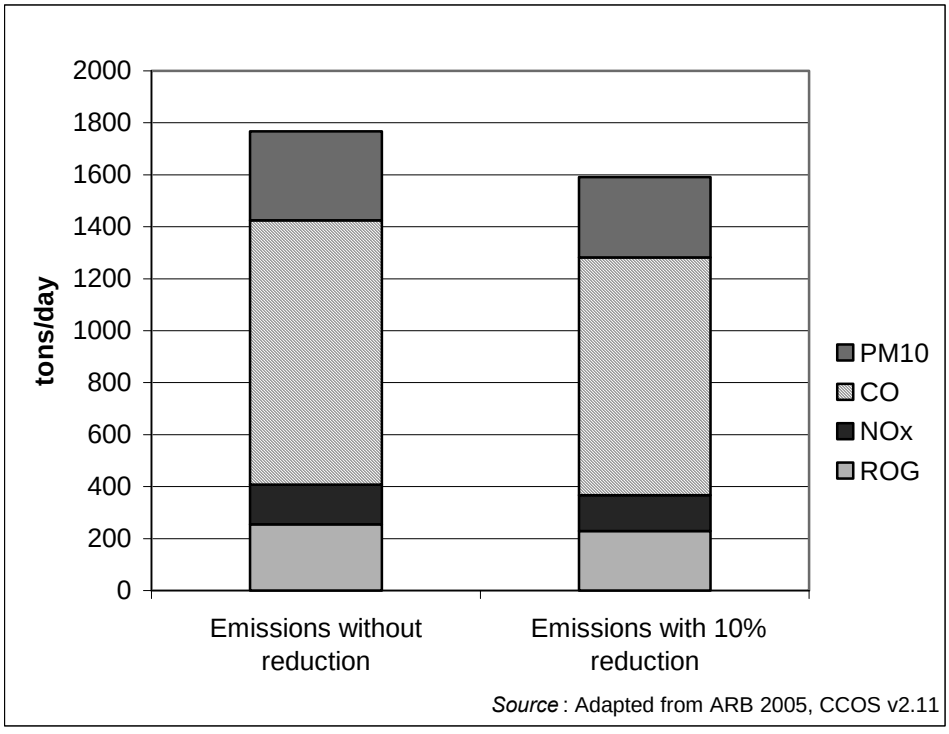
Past plans like the LUTRAQ transportation model in Oregon and the California Energy Commission publication, Energy Aware Planning Guide (CEC 1993), estimate a 10% minimum reduction in number of trips and energy usage, respectively. The results in applying a similar, modest 10%

reduction in emissions to the emissions forecast for 2020 is shown in Figure 4-7, which illustrates the total emissions of ROG, NOx, CO, and PM10 for all sources with and without a 10% reduction in the 2020 forecast. Though the tons/day of emissions that can be saved with a 10% reduction in emissions may seem small, it amounts to approximately 64,500 tons/year fewer emissions than without a 10% reduction.

The emission reductions estimates may seem small, but they are also significant when compared with individual stationary sources. Reductions achieved with the implementation of air quality goals and policies may help relieve some of the burden on stationary sources like manufacturing plants that contribute to economic growth in the San Joaquin Valley.

It is important to keep in mind that as time goes on, the benefits of the policies accumulate. Every year, a greater percentage of the developed area will be in a pedestrian or transit friendly pattern. The sooner a program is implemented, the sooner significant benefits will be seen.

Figure 4-7 Combined Emissions from area-wide, on-road mobile (gasoline and diesel), and other mobile sources



Source: Adapted from ARB 2005, CCOS v2.11

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EXHIBIT I

FILED
Clerk of the Superior Court
DEC 03 2012
By: _____ Deputy

FILED
Clerk of the Superior Court
DEC 03 2012
By: A. Taylor, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

CLEVELAND NAT'L FOREST FOUNDATION, et al.,

Petitioners,

v.

SAN DIEGO ASS'N OF GOVERNMENTS,

Respondent;

And CONSOLIDATED CASE and COMPLAINT IN INTERVENTION BY the ATTORNEY GENERAL OF CALIFORNIA

Case No. 2011-00101593

RULING ON PETITIONS FOR WRIT OF MANDATE

Judge: Timothy B. Taylor
Dept.: 72

Hearing: November 30, 2012

1. Overview and Procedural History.

In this CEQA case, the petitioners and the Attorney General claim SANDAG abused its discretion when it decided to certify an EIR and adopt a Regional Transportation Plan (RTP) which for the first time included a "Sustainable Communities Strategy" (SCS) ostensibly designed to meet a greenhouse gas emission reduction target as required by Senate Bill 375, Stats. 2008, Ch. 728. The parties agree this is the first RTP in California to be adopted following the 2008 legislation [AR2075; AR 04465], but they fundamentally disagree about the reach and requirements of that statute as it interfaces with the requirements of CEQA. No court has heretofore interpreted SB 375; the RTP/SCS at issue is meant to provide a blueprint for transportation planning for the next

40 years; and entities like SANDAG up and down the State are looking for guidance from this case regarding how to implement SB 375 in the context of an EIR. Thus, this court is but a way station in the life of this case, which is clearly headed for appellate review regardless of the outcome at the trial level. The case arises against a backdrop of intense scientific and political debate over what one counsel referred to as the signal issue of our time: global climate change.

Petitioners Cleveland Nat'l Forest Foundation ("Cleveland") and the Center for Biological Diversity ("CBD") filed the petition on November 28, 2011. The case was assigned to Judge Hayes, but Cleveland challenged her and the case was reassigned. Petitioners CREED-21 and the Affordable Housing Coalition ("AHC") filed a substantially similar petition, also on November 28, 2011 (ROA 42). This case, No. 2011-00101660, was initially assigned to another department, but the parties later stipulated to (and the court ordered) consolidation with the low-numbered case (ROA 41).

Cleveland and CBD filed an amended petition on 1/23/12, adding the Sierra Club as a petitioner (ROA 17). The AG sought and obtained leave to intervene on 1/25/12, and filed her petition in intervention the same day on behalf of the People (ROA 22-25).

At a CMC on 2/24/12, the parties advised the court that the Administrative Record in this case exceeds 10,000 pages in length (as it turned out, it is over 30,000 pages). In light of this, the court adopted a party-proposed briefing schedule, granted relief from brief page limits imposed by the Rules of Court, and set the matter for a merits hearing (ROA 38). SANDAG subsequently filed answers to both the Cleveland/CBD/Sierra Club amended petition and the CREED-21/AHC petition (ROA 48, 49). SANDAG also filed its answer to the AG's petition in intervention.

The Administrative Record, which is contained on a CD, was lodged on June 27 (ROA 53), having been certified by SANDAG on May 3 (ROA 45). Joint excerpts are contained in two binders, which were lodged 10/25/12. On November 19, the parties lodged a "Corrected Joint Appendix" (ROA 80); but by this time, the court had done the lion's share of its review using the joint excerpts lodged in October.

The briefing has been extensive, and as will be explained below, might have been even more extensive. On June 27, the AG filed an opening brief, an amended opening brief, and (a few days later) an errata to the amended opening brief (ROA 52, 56). Also on June 27, CREED-21/AHC filed their opening brief (ROA 54), and Cleveland/CBD/Sierra Club filed their opening brief (ROA 55). This was a total of 81 pages of briefing (not counting the AG's amendments and corrections). On Sept. 10, SANDAG filed its responsive briefs: one in response to the AG's amended brief (ROA 62), and a second in response to the Cleveland and CREED-21 briefs (ROA 61). This was a total of 95 pages of briefing.

On September 25, 2012, the court had the unpleasant experience of denying several requests for leave to file *amicus* briefs. ROA 68. Respondents recruited several *amici*

who spent time and energy preparing extensive briefs. See ROA 59, 64. The parties and the proposed *amici* appeared on September 25 to ask the court to allow the filing of these briefs, and to set a briefing schedule for joinders and responses thereto. The court was constrained to exercise its discretion to deny all such requests; it explained its decision in two ways. First, the court is aware of its limited role here: to ensure a complete record, and to provide the parties with a timely decision so that the case may proceed promptly to appellate review. The court was concerned that allowing *amicus* briefing, joinders and responses would retard rather than advance the latter goal (particularly given that the trial court's decision will not affect the others statewide with an interest in this topic, but rather only the parties – and then only for the limited period between the decision set forth below and the issuing of a learned opinion from the 4th DCA, Div. 1).

Second, and in a related vein, the court noted that Brobdingnagian budget cuts recently suffered by the Judicial Branch have caused the San Diego Superior Court to lay off hundreds of staff, stop providing court reporters in civil cases, restrict office hours, and, most recently, close a county-wide total of seven civil independent calendar courtrooms (with a consequent re-distribution of the caseload among the "surviving" departments). Again, the court was concerned that 100+ pages of additional briefing (on top of the lengthy party/intervenor briefs) could not be properly addressed by the court in a timely fashion, given these harsh fiscal and workload realities. Fortunately, the work done by *amici* will not have been wasted; they remain free to polish their briefs in light of this court's decision and seek leave to file them as the case proceeds to review before courts with broader authority.

Finally, reply briefing was filed by the AG on October 12; petitioners filed their consolidated reply that same day (ROA 72, 73). This was an additional 50 pages of briefing. The court has reviewed the opening, opposition and reply briefing, as well as the Administrative Record and the Supplement thereto filed October 22 (ROA 74).

The court notes that the briefing was accompanied by lodgments of non-California authorities. The court asks the parties to forebear from routinely lodging copies of federal or foreign authorities in the future. These are ordinarily available to the court on Westlaw. Counsel are encouraged to review the Summer 2011 amendments to CRC 3.1113(i) in this regard. The former rule made such lodgments mandatory; the current rule permits judicial discretion in this area. The court will advise counsel if it needs a lodgment of a non-California authority. Many trees will be saved if counsel will honor this request. Also, recent budget cuts imposed on the court make the clerk time for the handling of these lodgments quite problematic.

On November 16, 2012, the court published a lengthy tentative ruling. The court did so early, in order to facilitate counsel's preparation in light of the intervening Thanksgiving holiday. The court entertained well-prepared and very thoughtful argument on November 30 from Mr. Seymour on behalf of SANDAG, Mr. Selmi on behalf of petitioners, and by Mr. Patterson and Ms. Durbin on behalf of the AG. Petitioners and the AG used a Powerpoint presentation, which the court marked as Ex. 1 to the hearing for record purposes. Following argument, the court took the matter under submission. The court

now renders its decision. Record references below are to the excerpts lodged by the parties in October, except where stated. The court notes that, near the end of her comments during the 1 hour 45 minute hearing, Ms. Durbin requested a Statement of Decision. This is not required, as there was no "trial" of this matter as contemplated by CCP section 632. There was no testimony or cross examination; the matter proceeded, as most if not all CEQA cases do, in the manner of a complex motion argument. The court hopes that the following discussion will be deemed by the parties and the reviewing court to be an adequate specification of the grounds for non-compliance as required by Pub. Res. Code section 21005(c), and an adequate setting forth of the court's decision and the reasons therefor.

2. Overview of the CEQA Process.

A. The Court's Role in CEQA Cases.

In *Mira Mar Mobile Community v. City of Oceanside,* 119 Cal.App.4th 477, 486 (2004) (*Mira Mar Mobile Community*), the court explained that "[i]n a mandate proceeding to review an agency's decision for compliance with CEQA, [courts] review the administrative record *de novo* [citation], focusing on the adequacy and completeness of the EIR and whether it reflects a good faith effort at full disclosure. [Citation.] [The court's] role is to determine whether the challenged EIR is sufficient as an information document, not whether its ultimate conclusions are correct. [Citation.]" An EIR is presumed adequate. Pub. Res. Code § 21167.3, subd. (a).

Courts review an agency's action under CEQA for a prejudicial abuse of discretion. Pub. Res. Code § 21168.5. "Abuse of discretion is established if the agency has not proceeded in a manner required by law or if the determination or decision is not supported by substantial evidence." *Id.;* see *Mira Mar Mobile Community, supra,* 119 Cal.App.4th at 486; *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* ("*Grossmont*"), 141 Cal. App. 4th 86, 96 (2006)(same).

In defining the term "substantial evidence," the CEQA Guidelines state: " 'Substantial evidence' ... means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made ... is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion[,] narrative [or] evidence which is clearly erroneous or inaccurate ... does not constitute substantial evidence." CEQA Guidelines, § 15384(a). "In applying the substantial evidence standard, [courts] resolve all reasonable doubts in favor of the administrative finding and decision. [Citation.]" *Mira Mar Mobile Community, supra,* 119 Cal.App.4th at 486; *Grossmont, supra,* 141 Cal. App. 4th at 96.

Although the lead agency's factual determinations are subject to the foregoing deferential rules of review, questions of interpretation or application of the requirements of CEQA are matters of law. While judges may not substitute their judgment for that of the decision

makers, they must ensure strict compliance with the procedures and mandates of the statute. *Grossmont, supra*, 141 Cal. App. 4th at 96.

B. The Three Steps of CEQA.

CEQA establishes "a three-tiered process to ensure that public agencies inform their decisions with environmental considerations." *Banker's Hill, et al v. City of San Diego*, 139 Cal. App. 4th 249, 257 (2006)("*Banker's Hill*"); see also CEQA Guidelines, § 15002(k)(describing three-step process).

First Step in the CEQA Process.

The first step "is jurisdictional, requiring that an agency conduct a preliminary review in order to determine whether CEQA applies to a proposed activity." *Banker's Hill, supra,* 139 Cal. App. 4th at 257; see also Guidelines, § 15060. The Guidelines give the agency 30 days to conduct this preliminary review. (Guidelines, § 15060.) The agency must first determine if the activity in question amounts to a "project." *Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372, 380. "A CEQA ...project falls into one of three categories of activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment (§ 21065.)" *Sunset Sky Ranch Pilots Assn. v. County of Sacramento* (2009) 47 Cal.4th 902, 907.

As part of the preliminary review, the public agency must also determine the application of any statutory exemptions or categorical exemptions that would exempt the proposed project from further review under CEQA. See Guidelines, § 15282 (listing statutory exemptions); Guidelines, §§ 15300–15333 (listing 33 classes of categorical exemptions). The categorical exemptions are contained in the Guidelines and are formulated by the Secretary under authority conferred by CEQA section 21084(a). If, as a result of preliminary review, "the agency finds the project is exempt from CEQA under any of the stated exemptions, no further environmental review is necessary. The agency may prepare and file a notice of exemption, citing the relevant section of the Guidelines and including a brief 'statement of reasons to support the finding.' " *Banker's Hill, supra*, 139 Cal.App.4th at 258, citing Guidelines, §§ 15061(d), 15062(a)(3).

Second Step in the CEQA Process.

If the project does not fall within an exemption, the agency proceeds to the second step of the process and conducts an initial study to determine if the project *may* have a significant effect on the environment. (Guidelines, § 15063.) If, based on the initial study, the public agency determines that "there is substantial evidence, in light of the whole record ... that the project may have a significant effect on the environment, an environmental impact report [(EIR)] shall be prepared." [CEQA, § 21080(d).] On the other hand, if the initial study demonstrates that the project "would not have a significant effect on the environment," either because "[t]here is no substantial evidence, in light of whole record" to that effect or the revisions to the project would avoid such an effect, the

agency makes a "negative declaration," briefly describing the basis for its conclusion. (CEQA, § 21080(c)(1); see Guidelines, § 15063(b)(2); *Banker's Hill, supra*, 139 Cal.App.4th at 259.)

The Guidelines and case law further define the standard that an agency uses to determine whether to issue a negative declaration. "[I]f a lead agency is presented with a *fair argument* that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." (Guidelines, § 15064(f)(1), italics added.) This formulation of the standard for determining whether to issue a negative declaration is often referred to as the "fair argument" standard. See *Laurel Heights Improvement Assn. v. Regents of University of California,* 6 Cal.4th 1112, 1134–1135 (1993). Under the fair argument standard, a project "may" have a significant effect whenever there is a "reasonable possibility" that a significant effect will occur. *No Oil v. City of Los Angeles*, 13 Cal.3d 68, 83-84 (1974). Substantial evidence, for purposes of the fair argument standard, includes "fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact." § 21080, subd. (e)(1). Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts unrelated to physical impacts on the environment. § 21080, subd. (e)(2).

If the initial study reveals no substantial evidence that the project may have a significant environmental effect, the agency may adopt a negative declaration. Pub. Res. Code § 21080, subd. (c)(2); Guidelines, § 15070, subd. (b); *Grand Terrace, supra,* 160 Cal.App.4th at 1331; *Save the Plastic Bag Coalition v. City of Manhattan Beach*, 52 Cal. 4th 155, 175 (2011)(holding common sense is part of the substantial evidence analysis). "Alternatively, if there is no substantial evidence of any net significant environmental effect in light of revisions in the project that would mitigate any potentially significant effects, the agency may adopt [an MND]. [Citation.] [An MND] is one in which '(1) the proposed conditions "avoid the effects or mitigate the effects to a point where *clearly* no significant effect on the environment would occur, *and* (2) there is *no substantial evidence* in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment." (§ 21064.5 . . . .)' [Citations.]" *Grand Terrace, supra,* at 1331-1332. The MND allows the project to go forward subject to the mitigating measures. Pub. Res. Code §§ 21064.5, 21080, subd. (c); see *Grand Terrace, supra,* 160 Cal. App. 4th at 1331.

Third Step in the CEQA Process.

If no negative declaration is issued, the preparation of an EIR is the third and final step in the CEQA process. *Banker's Hill, supra*, 139 Cal. App. 4th at 259; Guidelines, §§ 15063(b)(1), 15080; CEQA, §§ 21100, 21151.

C. The Environmental Impact Report.

Central to CEQA is the EIR, which has as its purpose informing the public and government officials of the environmental consequences of decisions before they are made. [Citation.] "An EIR must be prepared on any 'project' a local agency intends to approve or carry out which 'may have a significant effect on the environment.' Pub. Res. Code §§ 21100, 21151; Guidelines, § 15002, subd. (f)(1). The term 'project' is broadly defined and includes any activities which have a potential for resulting in a physical change in the environment, directly or ultimately. Pub Res. Code § 21065; Guidelines, §§ 15002, subd. (d), 15378, subd. (a); [Citation].) The definition encompasses a wide spectrum, ranging from the adoption of a general plan, which is by its nature tentative and subject to change, to activities with a more immediate impact, such as the issuance of a conditional use permit for a site-specific development proposal." *CREED v. City of San Diego*, 134 Cal. App. 4th 598, 604 (2005).

"To accommodate this diversity, the Guidelines describe several types of EIR's, which may be tailored to different situations. The most common is the project EIR, which examines the environmental impacts of a specific development project. (Guidelines, § 15161.) A quite different type is the program EIR, which 'may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.'" Guidelines, § 15168, subd. (a); *CREED, supra*, 134 Cal. App. 4th at 605. As the court held in *CREED*, a program EIR may serve as the EIR for a subsequently proposed project only to the extent it contemplates and adequately analyzes the potential environmental impacts of the project. *CREED, supra,* 134 Cal. App. 4th at 615.

The EIR at issue in this case is of the latter variety, a program EIR. Cleveland/CBD/ Sierra Club accuse SANDAG of attempting to use the "programmatic" nature of the EIR as an invalid attempt to excuse it from fully analyzing the health impacts of the RTP. [ROA 55 at 15] The AG joins in this criticism. [ROA 52 at 29]

Under CEQA, an EIR is presumed adequate (Pub. Resources Code, § 21167.3), and the plaintiff in a CEQA action has the burden of proving otherwise. (*Preserve Wild Santee v. City of Santee*, 210 Cal. App. 4th 260, 275 (4th DCA Div. 1 Oct. 19, 2012, internal quotation marks omitted), quoting *Concerned Citizens of South Central L.A. v. Los Angeles Unified School Dist.* (1994) 24 Cal.App.4th 826, 836.) Courts review an agency's determinations and decisions for abuse of discretion. An agency abuses its discretion when it fails to proceed in a manner required by law or there is not substantial evidence to support its determination or decision. [§§ 21168, 21168.5; *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 426-427 (2007) ("*Vineyard*")]. "Judicial review of these two types of error differs significantly: While [courts] determine de novo whether the agency has employed the correct procedures, 'scrupulously enforc[ing] all legislatively mandated CEQA

requirements' [citation], [courts] accord greater deference to the agency's substantive factual conclusions." (*Vineyard, supra*, 40 Cal. 4th at 435.)

Consequently, in reviewing an EIR for CEQA compliance, courts adjust "scrutiny to the nature of the alleged defect, depending on whether the claim is predominantly one of improper procedure or a dispute over the facts." (*Vineyard, supra*, 40 Cal.4th at 435.) For example, where a petitioner claims an agency failed to include required information in its environmental analysis, the court's task is to determine whether the agency failed to proceed in the manner prescribed by CEQA. Conversely, where a petitioner challenges an agency's conclusion that a project's adverse environmental effects are adequately mitigated, courts review the agency's conclusion for substantial evidence. (*Vineyard, supra*, 40 Cal. 4th at 435.)

4. Issues Raised in This Case.

SANDAG is a council of local governments, and is one of 18 Metropolitan Planning Organizations ("MPO") in California. Each MPO is charged under law with the development of the region's RTP, which must be updated every four years. SANDAG began its work in April of 2010, released drafts of the RTP/SCS for public comment on 4/22/11, and released the draft EIR for public comment on June 7, 2011 [AR225-1580]. Petitioners and the AG's office criticized the drafts. [AR4430, 12696-12699, 17972-75, 18053-55] The final EIR was released on October 18, 2011 [AR1969-3401], and was certified after a public hearing on October 28, 2011. Inasmuch as the petitions were filed on November 28, there is no issue in this case regarding the timeliness of the legal challenges to the EIR. Nor are any issues raised by SANDAG with regard to exhaustion of administrative remedies or standing.

There is substantial overlap in the attacks on the EIR leveled by petitioners and the AG. Both sets of petitioners assert that the EIR fails to adequately analyze air quality impacts [ROA 54 at 3-6; ROA 55 at 12-20]. The AG joins in this assertion [ROA 52 at 7-29]. Both petitioners add that the EIR failed to analyze a reasonable range of alternatives [ROA 54 at 6; ROA 55 at 38].

CREED-21/AHC's brief focuses on the failure of the EIR to properly analyze air quality impacts in two specific areas: greenhouse gas emissions and sensitive receptors [ROA 54 at 4-6]. The Cleveland/CBD/Sierra Club brief carefully analyzes the deficiencies of the EIR in relation to greenhouse gas emissions (ROA 55 at part III), while the AG provides extensive discussion on both sensitive receptors and greenhouse gas emissions [ROA 52 at 14-18 and 22-29]. The Cleveland/CBD/Sierra Club brief raises several other issues which neither the AG nor CREED-21/AHC discuss in any detail (mass transit ridership, agricultural land, growth-inducing impacts, parking management, etc.).

5. Ruling.

The court finds that the real focal point of this controversy is whether the EIR is in conformance with a series of state policies enunciated by the legislative and executive branches since 2005 relating to greenhouse gases. Governor Schwarzenegger issued, in

2005, Executive Order S-03-05, which for the first time set a state goal of reducing greenhouse gas emissions. This Executive Order gave rise to the Global Warming Solutions Act of 2006 (AB 32), which is codified at H&S Code section 38500 *et seq.* Section 38550 provides:

"By January 1, 2008, the [Air Resources Board] shall, after one or more public workshops, with public notice, and an opportunity for all interested parties to comment, determine what the statewide greenhouse gas emissions level was in 1990, and approve in a public hearing, a statewide greenhouse gas emissions limit that is equivalent to that level, to be achieved by 2020. In order to ensure the most accurate determination feasible, the state board shall evaluate the best available scientific, technological, and economic information on greenhouse gas emissions to determine the 1990 level of greenhouse gas emissions."

It is undisputed that the ARB has established greenhouse gas targets for the SANDAG region for 2020 and 2035.

In 2008, the Legislature passed SB 375, which amended both the Public Resources Code and the Government Code in several respects. In section 1 of the statute, the Legislature found and declared:

"(a) The transportation sector contributes over 40 percent of the greenhouse gas emissions in the State of California; automobiles and light trucks alone contribute almost 30 percent. The transportation sector is the single largest contributor of greenhouse gases of any sector.

(b) In 2006, the Legislature passed and the Governor signed Assembly Bill 32 (Chapter 488 of the Statutes of 2006; hereafter AB 32), which requires the State of California to reduce its greenhouse gas emissions to 1990 levels no later than 2020. According to the State Air Resources Board, in 1990 greenhouse gas emissions from automobiles and light trucks were 108 million metric tons, but by 2004 these emissions had increased to 135 million metric tons.

(c) Greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.

(d) In addition, automobiles and light trucks account for 50 percent of air pollution in California and 70 percent of its consumption of petroleum. Changes in land use and transportation policy, based upon established modeling methodology, will provide significant assistance to California's goals to implement the federal and state Clean Air Acts and to reduce its dependence on petroleum.

(e) Current federal law requires regional transportation planning agencies to include a land use allocation in the regional transportation plan. Some regions have engaged in a regional "blueprint" process to prepare the land use allocation. This process has been open and transparent. The Legislature intends, by this act, to build upon that successful process by requiring metropolitan planning organizations to develop and incorporate a sustainable communities strategy which will be the land use allocation in the regional transportation plan.

(f) The California Environmental Quality Act (CEQA) is California's premier environmental statute. New provisions of CEQA should be enacted so that the statute encourages developers to submit applications and local governments to make land use decisions that will help the state achieve its climate goals under AB 32, assist in the achievement of state and federal air quality standards, and increase petroleum conservation.

(g) Current planning models and analytical techniques used for making transportation infrastructure decisions and for air quality planning should be able to assess the effects of policy choices, such as residential development patterns, expanded transit service and accessibility, the walkability of communities, and the use of economic incentives and disincentives.

(h) The California Transportation Commission has developed guidelines for travel demand models used in the development of regional transportation plans. This act assures the commission's continued oversight of the guidelines, as the commission may update them as needed from time to time.

(i) California local governments need a sustainable source of funding to be able to accommodate patterns of growth consistent with the state's climate, air quality, and energy conservation goals."

Section 4 of SB 375 added Government Code section 65080, which provides, in relevant part:

"(a) **Each transportation planning agency** designated under Section 29532 or 29532.1 **shall prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system**, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services. The plan shall be action-oriented and pragmatic, considering both the short-term and long-term future, and shall present clear, concise policy guidance to local and state officials. The regional transportation plan shall consider factors specified in Section 134 of Title 23 of the United States Code. Each transportation planning agency shall consider and incorporate, as appropriate, the transportation plans of cities, counties, districts, private organizations, and state and federal agencies.

(b) The regional transportation plan shall be an internally consistent document and shall include all of the following:

(1) A policy element that describes the transportation issues in the region, identifies and quantifies regional needs, and describes the desired short-range and long-range transportation goals, and pragmatic objective and policy statements. The objective and policy statements shall be consistent with the funding estimates of the financial element. The policy element of transportation planning agencies with populations that exceed 200,000 persons may quantify a set of indicators including, but not limited to, all of the following:
(A) Measures of mobility and traffic congestion, including, but not limited to, daily vehicle hours of delay per capita and vehicle miles traveled per capita.
(B) Measures of road and bridge maintenance and rehabilitation needs, including, but not limited to, roadway pavement and bridge conditions.
(C) Measures of means of travel, including, but not limited to, percentage share of all trips (work and nonwork) made by all of the following:
(i) Single occupant vehicle.
(ii) Multiple occupant vehicle or carpool.
(iii) Public transit including commuter rail and intercity rail.
(iv) Walking.
(v) Bicycling.
(D) Measures of safety and security, including, but not limited to, total injuries and fatalities assigned to each of the modes set forth in subparagraph (C).
(E) Measures of equity and accessibility, including, but not limited to, percentage of the population served by frequent and reliable public transit, with a breakdown by income bracket, and percentage of all jobs accessible by frequent and reliable public transit service, with a breakdown by income bracket.
(F) The requirements of this section may be met utilizing existing sources of information. No additional traffic counts, household surveys, or other sources of data shall be required.

(2) A sustainable communities strategy prepared by each metropolitan planning organization as follows:
(A) No later than September 30, 2010, the State Air Resources Board shall provide each affected region with greenhouse gas emission reduction targets for the automobile and light truck sector for 2020 and 2035, respectively.

***

(B) **Each metropolitan planning organization shall prepare a sustainable communities strategy,** subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to utilize the most recent planning assumptions considering local general plans and other factors. The sustainable communities strategy shall (i) identify the general location of uses, residential densities, and building intensities within the region, (ii) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over

the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth, (iii) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584, (iv) identify a transportation network to service the transportation needs of the region, (v) gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01, (vi) consider the state housing goals specified in Sections 65580 and 65581, (vii) **set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board,** and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506).

Section 14 of SB 375, among other revisions, amended Pub. Res. Code section 21155.3 to provide as follows:

"(a) The legislative body of a local jurisdiction may adopt traffic mitigation measures that would apply to transit priority projects. These measures shall be adopted or amended after a public hearing and may include requirements for the installation of traffic control improvements, street or road improvements, and contributions to road improvement or transit funds, transit passes for future residents, or other measures that will avoid or mitigate the traffic impacts of those transit priority projects.

(b)(1) A transit priority project that is seeking a discretionary approval is not required to comply with any additional mitigation measures required by paragraph (1) or (2) of subdivision (a) of Section 21081, for the traffic impacts of that project on intersections, streets, highways, freeways, or mass transit, if the local jurisdiction issuing that discretionary approval has adopted traffic mitigation measures in accordance with this section.
(2) Paragraph (1) does not restrict the authority of a local jurisdiction to adopt feasible mitigation measures with respect to the effects of a project on public health or on pedestrian or bicycle safety.

(c) The legislative body shall review its traffic mitigation measures and update them as needed at least every five years."

As already noted, the centerpiece of this case is the parties' fundamental disagreement over implementation of these statutory requirements within the framework of CEQA. In all the statutory quotations immediately above, **bold type** has been added by the court.

The court agrees with the points made in section III of the Cleveland brief (ROA 55), part II of the AG's brief (ROA 52), and pp. 4-5 of the CREED-21 brief (ROA 54) regarding the inadequate treatment of greenhouse gas emissions in the EIR. This failure is not, as SANDAG would have it, merely a debate over "editorial control" of the EIR (ROA 62 at 32:24). Rather, the issue is whether the EIR fails to carry out its role as an informational document to inform the public about the choices made by its leaders. The court finds that this failure is manifest in several ways.

First, although SANDAG acknowledges SB 375 mandates a "sharper focus on reducing GHG emissions" (AR 13091, Excerpt Tab 190), the EIR is impermissibly dismissive of Executive Order S-03-05. SANDAG argues that the Executive Order does not constitute a 'plan' for GHG reduction, and no state plan has been adopted to achieve the 2050 goal. [ROA 62 at 34] The EIR therefore does not find the RTP/SCS's failure to meet the Executive Order's goals to be a significant impact. This position fails to recognize that Executive Order S-3-05 is an official policy of the State of California, established by a

gubernatorial order in 2005, and not withdrawn or modified by a subsequent (and predecessor) governor. Quite obviously it was designed to address an environmental objective that is highly relevant under CEQA (climate stabilization). See AR 17622 (Excerpt Tab 216). SANDAG thus cannot simply ignore it. This is particularly true in a setting in which hundreds of thousands of people in the communities served by SANDAG live in low-lying areas near the coast, and are thus susceptible to rising sea levels associated with global climate change. The court in *Association of Irritated Residents v. State Air Resources Board*, 206 Cal. App. 4th 1487, 1492-93 (2012), recognized the importance of the Executive Order in upholding the ARB's Scoping Plan. The court agrees with petitioners that the failure of the EIR to cogently address the inconsistency between the dramatic increase in overall GHG emissions after 2020 contemplated by the RTP/SCS and the statewide policy of reducing same during the same three decades (2020-2050) constitutes a legally defective failure of the EIR to provide the SANDAG decision makers (and thus the public) with adequate information about the environmental impacts of the SCS/RTP. Moreover, as was pointed out in oral argument, having chosen to develop a plan for 15 years beyond that which was required under law, SANDAG was obligated to discuss impacts beyond the 2020 horizon. The ARB's scoping plan adopts the Executive Order, and SANDAG failed to extend the analysis to 2050.

Second, SANDAG's response has been to "kick the can down the road" and defer to "local jurisdictions." See, e.g. AR 31-0064, 32-0065, 33-0066, 34-0067, 35-0068, 117-0090, 118-0091 (Excerpts Vol. 1, Tab 3); 4.8-36, 0790 (Excerpts Tab 7); AR G-63-64, 03825-3826 (Excerpts Tab 8B); AR 27734 and 8A:2588 (Nov. 19 Appx.). This theme is repeated in SANDAG's brief at page 38 (arguing mitigation is the responsibility of other agencies). This perverts the regional planning function of SANDAG, ignores the purse string control SANDAG has over TransNet funds, and more importantly conflicts with Govt. Code section 65080(b)(2)(B) quoted above. As the AG argues, it is certainly feasible for SANDAG to agree to fund local climate action plans, yet the EIR does not adopt or even adequately discuss this form of mitigation (AR 2588, Excerpt Tab 8A). And as argued by petitioners in their consolidated reply brief, "encouraging" an optional local plan that "should" incorporate regional policies falls well short of a legally enforceable mitigation commitment with teeth. This is what the CEQA Guidelines require at subsections 15126.4(a)(1)(B), (a)(2) and (c)(5) in a setting in which SANDAG controls the funding for at least some of the projects contemplated by the SCS/RTP. Contrary to SANDAG's assertion (Oppo. at 38:21), it does have the legal power -- indeed, the obligation – to see to it that TransNet funds are spent in a manner consistent with the law. SANDAG conceded (even embraced) this at the November 30 hearing.

Resolution No. 2012-09, adopted by SANDAG, finds that the RTP/SCS "achieves the regional greenhouse gas reduction targets established by CARB" (AR 239-0219, Excerpts Tab 4) when in fact it either does not (AR 118-0091-92, Excerpts Tab 3; AR 4.8-21-23, 0775-0777, Excerpts Tab 7; AR 4.8-15-17, 02567-2569, 2578, Excerpts Tab 8A; AR08242-8245, Excerpts Tab 111) or does so based on questionable inputs [AR 30143, 30187 *et seq.* (Supp. filed 10/22/12); compare AR 14550 (Excerpt Tab 190). The shortcomings of the **EIR** in this regard (for petitioners do not contend, nor does the court

find, that SB 375 was violated) were called to SANDAG's attention as evidenced by what it called "Master Response # 20-23," discussed at AR G-55, 03817 *et seq.* (Excerpts Tab 8B); see also AR 19685 (Excerpts Tab 296); AR 25640 *ff* (Excerpts Tab 311). SANDAG erroneously and peremptorily states in response to these comments that the "upward trajectory" in per capita GHG emissions "does not present an SB 375 or CEQA compliance issue." AR G-59. CEQA requires further discussion, not a one sentence dismissal. Nor is the court convinced that SANDAG may avoid examination of GHG reduction due to "modeling constraints." AR G-68, 003830 (Master Response #23).

In light of the foregoing, the court finds that the petitioners and intervenor have overcome the presumption of validity and have established a prejudicial abuse of discretion. The court does not reach this conclusion lightly, as it is evident from section 9.0 of the EIR that it involved thousands of hours of effort by numerous talented professionals. No doubt the EIR is a satisfactory informational document in many respects; being the first in the state to tackle something as important to future generations as reduction of greenhouse gases in a regional transportation setting carried some risk, and the court, after reviewing the Administrative Record independently, finds that the EIR is inconsistent with state law as described above. Thus, it is the court's duty under *Vineyard, supra*, to sustain the positions advanced by petitioners and the petitioner in intervention.

Had they been permitted to file briefs, *amici* would no doubt have argued that the court's interpretation of CEQA's interface with Executive Order S-03-05 and the statutory scheme of SB 375 (which the Legislative Counsel's Digest filed with Secretary of State September 30, 2008 concedes is an "unfunded mandate") will retard growth, harm California's efforts to attract jobs and create economic activity, and slow down the state's recovery from the recession. All of this may very well be true, but these are arguments properly presented to the political branches of the government which adopted the Executive Order and enacted SB 375 in the first place.

Because the court finds it can resolve the case solely on the inadequate treatment in the EIR of the greenhouse gas emission issue, it finds that it need not address the other issues raised by the parties. *Compare Natter v. Palm Desert Rent Review Comm'n.,* 190 Cal. App. 3d 994, 1001 (1987); *Young v. Three for One Oil Royalties*, 1 Cal. 2d 639, 647-648 (1934).

Let a writ of mandate issue forthwith, directing respondent SANDAG to set aside its October 28, 2011certification of the EIR for the RTP/SCS. Counsel for petitioners is directed to forthwith submit same to the court for signature.

IT IS SO ORDERED.

Dated: December 3, 2012

TIMOTHY B. TAYLOR
Judge of the Superior Court

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

Central
330 West Broadway
San Diego, CA 92101

SHORT TITLE: Cleveland National Forest Foundation vs. San Diego Association of Governments [IMAGED]

CLERK'S CERTIFICATE OF SERVICE BY MAIL	CASE NUMBER: **37-2011-00101593-CU-TT-CTL**

I certify that I am not a party to this cause. I certify that a true copy of the Ruling on Petitions for Writ of Mandate dated December 3, 2012 was mailed following standard court practices in a sealed envelope with postage fully prepaid, addressed as indicated below. The mailing and this certification occurred at San Diego, California, on 12/03/2012.

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EXHIBIT J

Updating Transportation Impacts Analysis in the CEQA Guidelines

Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013)

Governor's Office of Planning and Research
8/6/2014

Senate Bill 743 (Steinberg, 2013)

Excerpt of Public Resources Code § 21099

(b) (1) The Office of Planning and Research shall prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing ***criteria for determining the significance of transportation impacts*** *of projects within transit priority areas. Those criteria shall* ***promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses****. In developing the criteria, the office shall recommend potential metrics to measure transportation impacts that* ***may include, but are not limited to, vehicle miles traveled****, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section.*

(2) Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, ***automobile delay****, as described solely by level of service or similar measures of vehicular capacity or traffic congestion* ***shall not be considered a significant impact on the environment*** *pursuant to this division, except in locations specifically identified in the guidelines, if any.*

(3) This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise, safety, or any other impact associated with transportation. Notwithstanding the foregoing, the adequacy of parking for a project shall not support a finding of significance pursuant to this section.

(4) This subdivision ***does not preclude the application of local general plan policies, zoning codes, conditions of approval, thresholds, or any other planning requirements*** *pursuant to the police power or any other authority.*

(5) ***On or before July 1, 2014****, the Office of Planning and Research shall circulate* ***a draft*** *revision prepared pursuant to paragraph (1).*

(c) (1) The Office of Planning and Research ***may adopt guidelines*** *pursuant to Section 21083* ***establishing alternative metrics to the metrics used for traffic levels of service for transportation impacts outside transit priority areas****. The alternative metrics may include the retention of traffic levels of service, where appropriate and as determined by the office.*

(2) This subdivision shall not affect the standard of review that would apply to the new guidelines adopted pursuant to this section.

Executive Summary

On September 27, 2013, Governor Brown signed Senate Bill 743 (Steinberg, 2013). Among other things, SB 743 creates a process to change the way we analyze transportation impacts under the California Environmental Quality Act (Public Resources Code section 21000 and following) (CEQA). Currently, environmental review of transportation impacts focuses on the delay that vehicles experience at intersections and on roadway segments. That delay is often measured using a metric known as "level of service," or LOS. Mitigation for increased delay often involves increasing capacity (i.e. the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage alternative forms of transportation. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses.

SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines (Title 14 of the California Code of Regulations sections and following) to provide an alternative to level of service for evaluating transportation impacts. The alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (New Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." (*Ibid*.)

This document contains a ***preliminary discussion draft*** of changes to the CEQA Guidelines implementing SB 743. In developing this preliminary discussion draft, OPR consulted with a wide variety of potentially affected stakeholders, including local governments, metropolitan planning organizations, state agencies, developers, transportation planners and engineers, environmental organizations, transportation advocates, academics, and others. OPR released its preliminary evaluation of different alternatives for public review and comment in December 2013. Having considered all comments that it received, and conducted additional research and consultation, OPR now seeks public review of this preliminary discussion draft.

This document contains background information, a narrative explanation of the proposed changes, text of the proposed changes, and appendices containing more detailed background information.

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Analyzing Transportation Impacts

Proposed New Section 15064.3 and Proposed Amendments to Appendix F

Background

Californians drive approximately 332 *billion* vehicle miles each year. That driving accounts for 36 percent of all greenhouse gases in the state. (California Air Resources Board, First Update to the Climate Change Scoping Plan (May 2014).) Meanwhile, existing roadway networks are deteriorating. While new development may pay the capital cost of installing roadway improvements, neither the state nor local governments are able to fully fund operations and maintenance. (See, e.g., Nichols Consulting Engineers, California Statewide Local Streets and Roads Needs Assessment (January 2013).) While the health benefits of walking, bicycling and transit use are becoming more well-known, planning has literally pushed those other modes aside. Why?

Traffic studies used in CEQA documents have typically focused on one thing: the impact of projects on traffic flows. By focusing solely on delay, environmental studies typically required projects to build bigger roads and intersections as "mitigation" for traffic impacts. That analysis tells only part of the story, however.

Impacts on pedestrians, bicyclists and transit, for example, have not typically been considered. Projects to improve conditions for pedestrians, bicyclist and transit have, in fact, been discouraged because of impacts related to congestion. Requiring "mitigation" for such impacts in the CEQA process imposes increasing financial burdens, not just on project developers that may contribute capital costs for bigger roadways, but also on taxpayers that must pay for maintenance and upkeep of those larger roads. Ironically, even "congestion relief" projects (i.e., bigger roadways) may only help traffic flow in the short term. In the long term, they attract more and more drivers (i.e., induced demand), leading not only to increased air pollution and greenhouse gas emissions, but also to a return to congested conditions. (Matute and Pincetl, "Use of Performance Measures that Prioritize Automobiles over Other Modes in Congested Areas;" Handy and Boarnet, "DRAFT Policy Brief on Highway Capacity and Induced Travel," (April 2014).) Under current practice, none of these impacts are considered in a typical project-level environmental review.

Such impacts have not completely escaped notice, however. For many years, local governments, transportation planners, environmental advocates and others have encouraged the Goveror's Office of Planning and Research (OPR) to revise the CEQA Guidelines to reframe the analysis of transportation impacts away from capacity. In 2009, the Natural Resources Agency revised the Appendix G checklist to focus more on multimodal, "complete streets" concepts. (Natural Resources Agency, Final Statement of Reasons: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (December 2009).)

Just last year, the Legislature passed, and Governor Brown signed into law, Senate Bill 743 (Steinberg, 2013), which requires OPR to develop alternative methods of measuring transportation impacts under CEQA. At a minimum, the new methods must apply within areas that are served by transit; however, OPR may extend the new methods statewide. Once the new transportation guidelines are adopted, automobile delay will no longer be considered to be an environmental impact under CEQA. SB 743 requires OPR to circulate a first draft of the new guidelines by July 1, 2014. The preliminary discussion draft below satisfies that requirement.

Before turning to a detailed explanation of the proposed text, OPR urges reviewers to consider the following:

- This is a ***preliminary discussion draft*** of a proposal that responds to SB 743. It reflects the information and research contained in OPR's Preliminary Evaluation of Alternative Methods of Transportation Analysis (December 2013), as well as comments submitted on that evaluation and informal consultation with stakeholder groups across the state. However, OPR expects this draft to evolve, perhaps substantially, in response to this larger vetting and review process.
- Because this is a preliminary discussion draft, reviewers may notice some terms that should be defined, or concepts that should be further explored. OPR invites your suggestions in that regard.
- This proposal involves changes to the CEQA Guidelines. Because the CEQA Guidelines apply to all public agencies, and all projects, throughout the state, they generally must be drafted broadly. Similarly, this proposal reflects CEQA's typical deference to lead agencies on issues related to methodology. The background paper accompanying this proposal, however, provides additional detail on a sample methodology for conducting an analysis, lists models capable of estimating vehicle miles traveled, and ideas for mitigation and alternatives. We invite reviewers to let us know if greater or less detail should be included in the new Guidelines.

This preliminary discussion draft consists of several parts. First, it contains a proposed new section 15064.3 of the CEQA Guidelines, which itself contains several subdivisions. Second, it proposes amendments to Appendix F (Energy Impacts) to describe possible mitigation measures and alternatives. Each of these components is described below.

Explanation of Proposed New Section 15064.3

OPR proposes to add a new section 15064.3 to the CEQA Guidelines to provide new methods of measuring transportation impacts. OPR initially considered whether to put the new methods in an appendix or in a new section of the Guidelines. OPR chose the latter, because experience with Appendix F, which requires analysis of energy impacts, has shown that requirements in appendices may not be consistently applied in practice.

Having decided to add a new section to the Guidelines, the next question was where to put it. As required by SB 743, the new guidelines focus on "determining the significance of transportation impacts." Section 15064 of the CEQA Guidelines contains general rules regarding "determining the

significance of the environmental effects caused by a project." Since the new Guideline section focuses on the specific rules regarding transportation impacts, OPR determined that it would be appropriate to place the new rules close to the section containing the general rules. Also, the new section 15064.3 would be contained within Article 5 of the Guidelines, which address "preliminary review of projects and conduct of initial study," and therefore would be relevant to both negative declarations and environmental impact reports.

The proposed new section 15064.3 contains several subdivisions, which are described below.

Subdivision (a): Purpose

Subdivision (a) sets forth the purpose of the entire new section 15064.3. First, the subdivision clarifies that the primary consideration, in an environmental analysis, regarding transportation is the amount and distance that a project might cause people to drive. This captures two measures of transportation impacts: auto trips generated and trip distance. These factors are important in an environmental analysis for the reasons set forth in the background materials supporting vehicle miles traveled as a transportation metric. These factors were also identified by the legislature in SB 743. (Pub. Resources Code § 21099(b)(1).) Specifying that trip generation and vehicle miles traveled are the primary considerations in a transportation analysis is necessary because impacts analysis has historically focused on automobile delay.

The second sentence in subdivision (a) also identifies impacts to transit and the safety of other roadway users as relevant factors in an environmental analysis. Impacts to transit and facilities for pedestrians and bicyclists are relevant in an environmental impacts analysis because deterioration or interruption may cause users switch from transit or active modes to single-occupant vehicles, thereby causing energy consumption and air pollution to increase. Further, impacts to human safety are clearly impacts under CEQA. (Pub. Resources Code § 21083(b)(3) (a significance finding is required if "a project will cause substantial adverse effects on human beings, either directly or indirectly").) Finally, SB 743 requires the new guidelines to promote "multimodal transportation" and to provide for analysis of safety impacts. (Pub. Resources Code § 21099(b)(1), (b)(3).)

The third sentence clarifies that air quality and noise impacts related to transportation may still be relevant in a CEQA analysis. (Pub. Resources Code § 21099(b)(3) (the new guidelines do "not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation").) However, those impacts are typically analyzed in the air quality and noise sections of environmental documents. Further, there is nothing in SB 743 that requires analysis of noise or air quality in a transportation section of an environmental document. In fact, the content of any environmental document may vary provided that any required content is included in the document. (State CEQA Guidelines § 15120(a).)

Finally, the last sentence clarifies that automobile delay is not a significant effect on the environment. This sentence is necessary to reflect the direction in SB 743 itself that vehicle delay is not a significant environmental impact. (Pub. Resources Code § 21099(b)(2) ("Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described

solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any").) As noted above, traffic-related noise and air quality impacts, for example, may still be analyzed in CEQA and mitigated as needed. Mitigation would consist of measures to reduce noise or air pollutants, however, and not necessarily the delay that some vehicles may experience in congestion.

Subdivision (b): Criteria for Analyzing Transportation Impacts

While subdivision (a) sets forth general principles related to transportation analysis, subdivision (b) focuses on specific criteria for determining the significance of transportation impacts. It is further divided into four subdivisions: (1) vehicle miles traveled and land use projects, (2) induced travel and transportation projects, (3) safety, and (4) methodology.

The lead-in sentences to these subdivisions clarify two things. First, CEQA's general rules regarding the determination of significance apply to all potential impacts, including transportation impacts. These general rules include the necessity to consider context and substantial evidence related to the project under consideration, as well as the need to apply professional judgment. These rules are contained in section 15064 of the CEQA Guidelines, which is included as a cross-reference in subdivision (b). The second lead-in sentence clarifies that the new section 15064.3 contains rules that apply specifically to transportation impacts.

Subdivision (b)(1): Vehicle Miles Traveled and Land Use Projects

The first sentence in subdivision (b)(1) states that vehicle miles traveled is generally the most appropriate measure of transportation impacts. It uses the word "generally" because OPR recognizes that the CEQA Guidelines apply to a wide variety of project types and lead agencies. Therefore, this sentence recognizes that in appropriate circumstances, a lead agency may tailor its analysis to include other measures.

SB 743 did not authorize OPR to set thresholds, but it did direct OPR to develop Guidelines "for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code § 21099(b)(2).) Therefore, to provide guidance on determining the significance of impacts, subdivision (b)(1) describes factors that might indicate whether the amount of a project's vehicle miles traveled may be significant, or not.

For example, a project that results in vehicle miles traveled that is greater than the regional average might be considered to have a significant impact. Average in this case could be measured using an efficiency metric such as per capita, per employee, etc. Travel demand models can provide information on those regional averages. "Region" refers to the metropolitan planning organization or regional transportation plan area within which the project is located. Notably, because the proposed text states that greater than regional average "may indicate a significant impact," this subdivision would not prevent a local jurisdiction from applying a *more stringent* threshold. (Pub. Resources Code § 21099(e) (the new Guidelines do not "affect the authority of a public agency to establish or adopt thresholds of

significance that are more protective of the environment").) Note, this potential finding of significance would not apply to projects that are otherwise statutorily or categorically exempt.

Why regional average? First, the region generally represents the area within which most people travel for their daily needs. Second, focusing on the region recognizes the many different contexts that exist in California. Third, pursuant to SB 375, metropolitan planning organizations throughout the state are developing sustainable communities strategies as part of their regional transportation plans, and as part of that process, they are developing data related to vehicle miles traveled. Fourth, average vehicle miles traveled per capita, per employee, etc., can be determined at the regional level from existing data. Finally, because SB 375 requires all regions to reduce region-wide greenhouse gas emissions related to transportation, projects that move the region in the other direction may warrant a closer look.

Subdivision (b)(1) also gives examples of projects that might have a less than significant impact with respect to vehicle miles traveled. For example, projects that locate in areas served by transit, where vehicle miles traveled is generally known to be low, may be considered to have a less than significant impact. (See, e.g., California Air Pollution Control Officers Association, "Quantifying Greenhouse Gas Mitigation Measures," (August 2010).) Further, projects that are shown to decrease vehicle miles traveled, as compared to existing conditions, may be considered to have a less than significant impact. Such projects might include, for example, the addition of a grocery store to an existing neighborhood that enables existing residents to drive shorter distances. Notably, in describing these factors, the Guidelines use the word "may" to signal that a lead agency should still consider substantial evidence indicating that a project may still have significant vehicle miles traveled impacts. For example, the addition of regional serving retail to a neighborhood may draw customers from far beyond a single neighborhood, and therefore might actually increase vehicle miles traveled overall. Similarly, a project located near transit but that also includes a significant amount of parking might indicate that the project may still generate significant vehicle travel.

Most of the examples in this subdivision are most relevant to specific development projects. Land use plans, such as specific plans or general plans, might be considered to have a less than significant effect at the plan level if they are consistent with an adopted sustainable communities strategy.

Subdivision (b)(2): Induced Travel and Transportation Projects

While subdivision (b)(1) addresses vehicle miles traveled associated with land use projects, subdivision (b)(2) focuses on impacts that result from certain transportation projects. Specifically, research indicates that adding new traffic lanes in areas subject to congestion tends to lead to more people driving further distances. (Handy and Boarnet, "DRAFT Policy Brief on Highway Capacity and Induced Travel," (April 2014).) This is because the new roadway capacity may allow increased speeds on the roadway, which then allows people to access more distant locations in a shorter amount of time. Thus, the new roadway capacity may cause people to make trips that they would otherwise avoid because of congestion, or may make driving a more attractive mode of travel. Research also shows that extending new roadway capacity, like the addition of water or sewer infrastructure, may remove barriers to growth in undeveloped areas. Subdivision (b)(2) would therefore require lead agencies that add new physical roadway capacity in congested areas to consider these potential growth-inducing impacts.

Subdivision (b)(2) also clarifies that not all transportation projects would be expected to cause increases in vehicle miles traveled. For example, projects that are primarily designed to improve safety or operations would not typically be expected to create significant impacts. The same is true of pedestrian, bicycle and transit projects, including those that require reallocation or removal of motor vehicle lanes.

Subdivision (b)(3): Local Safety

Subdivision (b)(3) recognizes that vehicle miles traveled may not be the only impacts associated with transportation. While vehicle miles traveled may reflect regional concerns, transportation impacts may also be felt on a local level. The convenience of drivers and the layout of local roadway systems are issues that can, and likely will continue to be, addressed in local planning processes. Safety impacts, as noted above, are local impacts that are appropriate in a CEQA analysis.

Specifically, subdivision (b)(3) clarifies that lead agencies should consider whether a project may cause substantially unsafe conditions for various roadway users. The potential safety concern must be one that affects many people, not just an individual. Further, the potential safety concern must relate to actual project conditions, and not stem solely from subjective fears of an individual. Subdivision (b)(3) includes a non-exclusive list of potential factors that might affect the safety of different roadway users.

Subdivision (b)(4): Methodology

Subdivision (b)(4) provides guidance on methodology. First, it clarifies that analysis of a project's vehicle miles traveled is subject to the rule of reason. In other words, a lead agency would not be expected to trace every possible trip associated with a project down to the last mile. Conversely, to the extent that available models and tools allow, a lead agency would be expected to consider vehicle miles traveled that extend beyond the lead agency's political boundaries. (See, e.g., State CEQA Guidelines § 15151 ("An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible").) This clarification is needed because under current practice, some lead agencies do not consider the transportation impacts of their own projects that may be felt within adjacent jurisdictions.

Subdivision (b)(4) also recognizes the role for both models and professional judgment in estimating vehicle miles traveled. Many publicly available models are available that can estimate the amount of vehicle miles traveled associated with a project. Models, however, are only tools. A model relies on certain assumptions and its use may, or may not, be appropriate given a particular project and its context. For similar reasons, model outputs may need to be revised. Thus, subdivision (b)(4) expressly recognizes the role of professional judgment in using models. Notably, this is consistent with general CEQA rules in determining significance. (See, e.g., State CEQA Guidelines § 15064(b) (determining significance "calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data").) To promote transparency, subdivision (b)(4) requires that any adjustments to model inputs or outputs be documented and explained. Further, this documentation should be made plain in the environmental document itself.

Subdivision (c): Mitigation and Alternatives

Subdivision (c) restates the general rule that when a lead agency identifies a significant impact, it must consider mitigation measures that would reduce that impact. The selection of particular mitigation measures, however, is always left to the discretion of the lead agency. Further, OPR expects that agencies will continue to innovate and find new ways to reduce vehicular travel. Therefore, OPR proposes to identify several potential mitigation measures and alternatives in existing Appendix F (regarding energy impacts analysis), and include a cross-reference to Appendix F in subdivision (c). Subdivision (c) also makes explicit that this section does not limit any public agency's ability to condition a project pursuant to other laws. For example, while automobile delay will not be treated as a significant impact under CEQA, cities and counties may still require projects to achieve levels of service designated in general plans or zoning codes. (Pub. Resources Code § 21099(b)(4) ("This subdivision [requiring a new transportation metric under CEQA] does not preclude the application of local general plan policies, zoning codes, conditions of approval, thresholds, or any other planning requirements pursuant to the police power or any other authority").) Similarly, with regard to projects that have already undergone environmental review, subdivision (c) clarifies that nothing in these proposed rules would prevent a lead agency from enforcing previously adopted mitigation measures. In fact, within the bounds of other laws, including adopted general plans, lead agencies have discretion to apply or modify previously adopted mitigation measures. (*Napa Citizens for Honest Government v. Napa County Bd. of Sup*. (2001) 91 Cal. App. 4th 342, 358 (because "mistakes can be made and must be rectified, and … the vision of a region's citizens or its governing body may evolve over time… there are times when mitigation measures, once adopted, can be deleted").) Notably, deletion of measures imposed solely to address automobile delay should not require any additional environmental review because section 21099 of the Public Resources Code states that automobile delay is not a significant impact under CEQA.

Subdivision (d): Applicability

OPR recognizes that the procedures proposed in this section may not be familiar to all public agencies. OPR also recognizes that this section proposes a new way to evaluate transportation impacts. Therefore, to allow lead agencies time to familiarize themselves with these new procedures, OPR proposes a phased approach to implementation. Doing so will also allow OPR to continue studying the application of vehicle miles traveled in the environmental review process, and to propose further changes to this section if necessary.

Subdivision (d) explains when these new rules will apply to project reviews. The first sentence restates the general rule that changes to the CEQA Guidelines apply prospectively to new projects that have not already commenced environmental review. (See State CEQA Guidelines § 15007.)

The second sentence provides that the new procedures will apply immediately upon the effective date of these Guidelines to projects located within one-half mile of major transit stops and high quality transit corridors. Those transit-served areas have been the focus of planning under SB 375 and jurisdictions containing such areas may be more likely to be familiar with tools that estimate vehicle miles traveled.

The third sentence allows jurisdictions to opt-in to these new procedures, regardless of location, provided that they update their own CEQA procedures to reflect the rules in this section. (See State CEQA Guidelines § 15022.) This is intended to provide certainty to project applicants and the public regarding which rules will govern project applications. Notably, a lead agency's adoption of updates to its own CEQA procedures will not normally be considered a project that requires its own environmental review. (*See California Building Industry Assn. v. Bay Area Air Quality Management Dist*. (2014) 218 Cal. App. 4th 1171, 1183-1192 (certiorari granted on other grounds).)

Finally, the last sentence states that after January 1, 2016, the rules in this section will apply statewide.

Explanation of Amendments to Appendix F: Energy Impacts

OPR proposes to provide suggestions of potential mitigation measures and alternatives that might reduce a project's vehicle miles traveled in Appendix F of the State CEQA Guidelines. Appendix F provides detailed guidance on conducting an analysis of a project's energy impacts. Inclusion of the list of suggested measures in Appendix F is proposed for at least two reasons. First, vehicle miles traveled may be a relevant consideration in the analysis and mitigation of a project's energy impacts. Second, the list of potential mitigation measures is lengthy and is more appropriate for an appendix than the body of the Guidelines.

Notably, the suggested mitigation measures and alternatives were largely drawn from the California Air Pollution Control Officers Association's guide on Quantifying Greenhouse Gas Mitigation Measures. That guide relied on peer-reviewed research on the effects of various mitigation measures, and provides substantial evidence that the identified measures are likely to lead to quantifiable reductions in vehicle miles traveled.

Explanation of Amendments to Appendix G: Transportation

OPR proposes several changes to the questions related to transportation in Appendix G to conform to the proposed new Section 15064.3. First, OPR proposes to revise the question related to "measures of effectiveness" so that the focus is more on the circulation element and other plans governing transportation. Second, OPR proposes to revise the question that currently refers to "level of service" to focus instead on a project's vehicle miles traveled. Third, OPR proposes to recast the question related to design features so that it focuses instead on whether a roadway project would tend to induce additional travel. Fourth, OPR proposes to revise the question related to safety to address the factors described in subdivision (b)(3) of the proposed new Section 15064.3.

Text of Proposed New Section 15064.3

Proposed New **Section 15064.3. Determining the Significance of Transportation Impacts; Alternatives and Mitigation Measures**

(a) Purpose.

When analyzing a project's potential environmental impacts related to transportation, primary considerations include the amount and distance of automobile travel associated with the project. Other relevant considerations include the effects of the project on transit and non-motorized travel and the safety of all travelers. Indirect effects of project-related transportation, such as impacts to air quality and noise, may also be relevant, but may be analyzed together with stationary sources in other portions of the environmental document. A project's effect on automobile delay does not constitute a significant environmental impact.

(b) Criteria for Analyzing Transportation Impacts.

Section 15064 contains general rules governing the analysis, and the determination of significance, of environmental effects. Specific considerations involving transportation impacts are described in this section. For the purposes of this section, "vehicle miles traveled" refers to distance of automobile travel associated with a project.

(1) Vehicle Miles Traveled and Land Use Projects. Generally, transportation impacts of a project can be best measured using vehicle miles traveled. A development project that is not exempt and that results in vehicle miles traveled greater than regional average for the land use type (e.g. residential, employment, commercial) may indicate a significant impact. For the purposes of this subdivision, regional average should be measured per capita, per employee, per trip, per person-trip or other appropriate measure. Also for the purposes of this subdivision, region refers to the metropolitan planning organization or regional transportation planning agency within which the project is located. Development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor generally may be considered to have a less than significant transportation impact. Similarly, development projects, that result in net decreases in vehicle miles traveled, compared to existing conditions, may be considered to have a less than significant transportation impact. Land use plans that are either consistent with a sustainable communities strategy, or that achieve at least an equivalent reduction in vehicle miles traveled as projected to result from implementation of a sustainable communities strategy, generally may be considered to have a less than significant impact.

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(2) Induced Vehicle Travel and Transportation Projects. To the extent that a transportation project increases physical roadway capacity for automobiles in a congested area, or adds a new roadway to the network, the transportation analysis should analyze whether the project will induce additional automobile travel compared to existing conditions. The addition of general purpose highway or arterial lanes may indicate a significant impact except on rural roadways where the primary purpose is to improve safety and where speeds are not significantly altered. Transportation projects that do not add physical roadway capacity for automobiles, but instead are for the primary purpose of improving safety or operations, undertaking maintenance or rehabilitation, providing rail grade separations, or improving transit operations, generally would not result in a significant transportation impact. Also, new managed lanes (i.e. tolling, high-occupancy lanes, lanes for transit or freight vehicles only, etc.), or short auxiliary lanes, that are consistent with the transportation projects in a Regional Transportation Plan and Sustainable Communities Strategy, and for which induced travel was already adequately analyzed, generally would not result in a significant transportation impact. Transportation projects (including lane priority for transit, bicycle and pedestrian projects) that lead to net decreases in vehicle miles traveled, compared to existing conditions, may also be considered to have a less than significant transportation impact.

(3) Local Safety. In addition to a project's effect on vehicle miles traveled, a lead agency may also consider localized effects of project-related transportation on safety. Examples of objective factors that may be relevant may include:

(A) Increase exposure of bicyclists and pedestrians in vehicle conflict areas (i.e., remove pedestrian and bicycle facilities, increase roadway crossing times or distances, etc.).

(B) Contribute to queuing on freeway off-ramps where queues extend onto the mainline.

(C) Contribute to speed differentials of greater than 15 miles per hour between adjacent travel lanes.

(D) Increase motor vehicle speeds.

(E) Increase distance between pedestrian or bicycle crossings.

(4) Methodology. The lead agency's evaluation of the vehicle miles traveled associated with a project is subject to a rule of reason; however, a lead agency generally should not confine its evaluation to its own political boundary. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

(c) Alternatives and Mitigation.

Examples of mitigation measures and alternatives that may reduce vehicle miles travelled are included in Appendix F. Neither this section nor Appendix F limits the exercise of any public agency's discretion provided by other laws, including, but not limited to, the authority of cities and counties to condition project approvals pursuant to general plans and zoning codes. Previously adopted

measures to mitigate congestion impacts may continue to be enforced, or modified, at the discretion of the lead agency.

(d) Applicability.

The provisions of this section shall apply prospectively as described in section 15007. Upon filing of this section with the Secretary of State, this section shall apply to the analysis of projects located within one-half mile of major transit stops or high quality transit corridors. Outside of those areas, a lead agency may elect to be governed by the provisions of this section provided that it updates its own procedures pursuant to section 15022 to conform to the provisions of this section. After January 1, 2016, the provisions of this section shall apply statewide.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Sections 21099 and 21100, Public Resources Code; *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal. App. 4th 173.

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Text of Proposed Amendments to Appendix F

Appendix F

Energy Conservation

I. Introduction

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

(1) decreasing overall per capita energy consumption,

(2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and

(3) increasing reliance on renewable energy sources.

In order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)). Energy conservation implies that a project's cost effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, cost effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving the project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

II. EIR Contents

Potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. The following list of energy impact possibilities and potential conservation measures is designed to assist in the preparation of an EIR. In many instances specific items may not apply or additional items may be needed. Where items listed below are applicable or relevant to the project, they should be considered in the EIR.

A. Project Description may include the following items:

1. Energy consuming equipment and processes which will be used during construction, operation and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project.

2. Total energy requirements of the project by fuel type and end use.

3. Energy conservation equipment and design features.

4. Identification of energy supplies that would serve the project.

5. Total estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode.

B. Environmental Setting may include existing energy supplies and energy use patterns in the region and locality.

C. Environmental Impacts may include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.

2. The effects of the project on local and regional energy supplies and on, requirements for additional capacity.

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

4. The degree to which the project complies with existing energy standards.

5. The effects of the project on energy resources.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

D. Mitigation Measures may include:

1. Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.

2. The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid-waste.

3. The potential for reducing peak energy demand.

4. Alternate fuels (particularly renewable ones) or energy systems.

5. Energy conservation which could result from recycling efforts.

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6. Potential measures to reduce vehicle miles traveled include, but are not limited to:

a. Improving or increasing access to transit.

b. Increasing access to common goods and services, such as groceries, schools, and daycare.

c. Incorporating affordable housing into the project.

d. Improving the jobs/housing fit of a community.

e. Incorporating neighborhood electric vehicle network.

f. Orienting the project toward transit, bicycle and pedestrian facilities.

g. Improving pedestrian or bicycle networks, or transit service.

h. Traffic calming.

i. Providing bicycle parking.

j. Limiting parking supply.

k. Unbundling parking costs.

***l*. Parking or roadway pricing or cash-out programs.**

m. Implementing a commute reduction program.

n. Providing car-sharing, bike sharing, and ride-sharing programs.

o. Providing transit passes.

E. Alternatives should be compared in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy. **Examples of project alternatives that may reduce vehicle miles traveled include, but are not limited to:**

1. Locating the project in an area of the region that already exhibits below average vehicle miles traveled.

2. Locating the project near transit.

3. Increasing project density.

4. Increasing the mix of uses within the project, or within the project's surroundings.

5. Increasing connectivity and/or intersection density on the project site.

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6. Deploying management (e.g. pricing, vehicle occupancy requirements) on roadways or roadway lanes.

F. Unavoidable Adverse Effects may include wasteful, inefficient and unnecessary consumption of energy during the project construction, operation, maintenance and/or removal that cannot be feasibly mitigated.

G. Irreversible Commitment of Resources may include a discussion of how the project preempts future energy development or future energy conservation.

H. Short-Term Gains versus Long-Term Impacts can be compared by calculating the project's energy costs over the project's lifetime.

I. Growth Inducing Effects may include the estimated energy consumption of growth induced by the project.

Note: Authority cited: Sections 21083**, 21083.05** and 21087, Public Resources Code. Reference: Sections 21000-21176. Public Resources Code.

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Text of Proposed Amendments to Appendix G

The following is an excerpt of Section XVI of existing Appendix G, as proposed to be amended to conform to proposed Section 15064.3:

[…]

XVI. TRANSPORTATION~~/TRAFFIC~~ -- Would the project:

a) Conflict with a~~n applicable~~ plan, ordinance or policy ~~establishing measures of effectiveness for the~~ **addressing the safety or** performance of the circulation system, **including transit, roadways, bicycle lanes and pedestrian paths?** ~~taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?~~

b) **Cause vehicle miles traveled (per capita, per service population, or other appropriate measure) that exceeds the regional average for that land use?** ~~Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?~~

c) Result in **substantially unsafe conditions for pedestrians, bicyclists, transit users, motorists or other users of public rights of way by, among other things, increasing speeds, increasing exposure of bicyclists and pedestrians in vehicle conflict areas, etc.?** ~~a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?~~

d) Substantially **induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network?** ~~increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?~~

e) Result in inadequate emergency access?

~~f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?~~

[…]

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Providing Input

This is a preliminary discussion draft, which we expect to change for the better through public input. We hope that you will share your thoughts and expertise in this effort.

When and Where to Submit Comments

Input may be submitted electronically to CEQA.Guidelines@ceres.ca.gov. While electronic submission is preferred, suggestions may also be mailed or hand delivered to:

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Please submit all suggestions before **October 10, 2014** at **5:00 p.m**.

Tips for Providing Effective Input

OPR would like to encourage robust engagement in this update process. We expect that participants will bring a variety of perspectives. While opposing views may be strongly held, discourse can and should proceed in a civil and professional manner. To maximize the value of your input, please consider the following:

- In your comment(s), please clearly identify the specific issues on which you are commenting. If you are commenting on a particular word, phrase, or sentence, please provide the page number and paragraph citation.
- Explain why you agree or disagree with OPR's proposed changes. Where you disagree with a particular portion of the proposal, please suggest alternative language.
- Describe any assumptions and support assertions with legal authority and factual information, including any technical information and/or data. Where possible, provide specific examples to illustrate your concerns.
- When possible, consider trade-offs and potentially opposing views.
- Focus comments on the issues that are covered within the scope of the proposed changes. Avoid addressing rules or policies other than those contained in this proposal.
- Consider quality over quantity. One well-supported comment may be more influential than one hundred form letters.
- Please submit any comments within the timeframe provided.

Appendices

Appendix A: Frequently Asked Questions

Appendix B: Vehicle Miles Traveled, Air Quality and Energy

Appendix C: Technical Considerations in Assessing Vehicle Miles Traveled

Appendix D: Sample Trip-Based VMT Calculation

Appendix E: Estimating VMT From Roadway Capacity Increasing Projects

Appendix F: Available Models for Estimating Vehicle Miles Traveled

Appendix A

Frequently Asked Questions

1. *What is "level of service" and how is it used in environmental review?*

   Many jurisdictions use "level of service" standards to measure potential transportation impacts of development projects and long range plans. Commonly known as LOS, level of service measures vehicle delay at intersections and on roadways and is represented as a letter grade A through F. LOS A represents free flowing traffic, while LOS F represents congested conditions. LOS standards are often found in local general plans and congestion management plans. LOS is also often used in traffic impact studies prepared under the California Environmental Quality Act (CEQA). Exceeding LOS standards can require changes in proposed projects, installation of additional infrastructure, or, in some cases, financial penalties.

2. *What is wrong with treating congestion as an environmental impact under CEQA?*

   Stakeholders have reported several problems with level of service, and congestion generally, as a measure of environmental impact under CEQA. First, as a measure of delay, congestion measures more of social, rather than an environmental impact. Second, the typical way to mitigate congestion impacts is to build larger roadways, which imposes long-term maintenance costs on tax-payers, pushes out other modes of travel, and may ultimately encourage even more congestion. Third, addressing congestion requires public agencies to balance many factors, including fiscal, health, environmental and other quality of life concerns. Such balancing is more appropriate in the planning context where agency decisions typically receive deference.

3. *How does SB 743 affect the use of level of service to measure transportation impacts?*

   SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service for evaluating transportation impacts. The alternative approach must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*New* Public Resources Code Section 21099(b)(1).) According to the statute, potential alternative measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." (*Ibid*.) OPR must develop an alternative approach for areas near transit, but also has discretion to develop such alternative criteria beyond those areas, if appropriate. (*Id*. at subd. (c).)

Transportation impacts related to air quality, noise and safety must still be analyzed under CEQA where appropriate. (*Id*. at subd. (b)(3).)

4. *Will the new CEQA Guidelines eliminate the use of level of service in all cases?*

   No. Automobile delay will no longer be considered a significant environmental impact under CEQA in areas specified in the Guidelines. As currently proposed, those areas would initially include areas near transit, as well as those jurisdictions that wish to opt-in to this new approach. After a period of time, the new Guidelines would apply throughout the state. Level of service may still be used, however, for planning purposes outside of CEQA (see below).

5. *Some communities still use level of service to plan their transportation networks. Will the new guidelines prevent my city/county from using it for that purpose?*

   No. The Guidelines only address impacts analysis under CEQA. Many jurisdictions have level of service standards in their general plans, zoning codes and fee programs. These proposed Guidelines would not affect those uses of level of service. Maintaining level of service in planning allows a jurisdiction to balance automobile delay with other interests, e.g. mode share objectives, human health, fiscal health, etc.

6. *Doesn't level of service help indicate whether the project will cause safety concerns? How will the new Guidelines address local safety?*

   Safety is an issue that both the statute and these proposed Guidelines identify as a potential area of study under CEQA. Level of service does not itself measure safety. For example, higher level of service often indicates higher vehicle speeds, which put all road users at greater risk in the event of a collision. On the other hand, it may indicate areas where large speed differentials might occur, for example an off ramp backing up onto a highway mainline. Where analysis is needed to determine the significance of potential safety impacts, that analysis will still be required under these proposed Guidelines.

7. *Traffic causes air quality and noise problems. How will those issues be addressed in the new Guidelines?*

   SB 743 and these proposed Guidelines explicitly specify that potential impacts from transportation other than delay, for example air quality and noise, continue to be analyzed under CEQA. The methods for addressing those factors remain unchanged.

8. *How will the new Guidelines affect fee programs in my community?*

   SB 743 and these proposed Guidelines both recognize that jurisdictions maintain their ability to retain and enact fee programs, including those based on level of service. The proposed Guidelines explicitly state that they do not limit the discretion of public agencies in implementing other laws, including city and county general plans, zoning codes and other planning laws.

9. *Why not limit the change to just transit priority areas?*

   OPR looked broadly, but did not find a geographic area of the state or project type for which use of level of service would do a better job of protecting the environment or human health, or achieving the interests specified in the statute (promoting reduction of greenhouse gas emissions, development of multimodal transportation networks, and a diversity of land uses) than vehicle miles traveled. However, as noted above, the proposed guideline would phase-in application of the new methodology, and would start in areas near transit.

10. *My community does not have frequent transit. What options are available for reducing VMT?*

    Extensive research has been conducted on different ways that local governments can reduce vehicle miles traveled. Some useful sources of information include:

    - California Air Pollution Control Officers Association, "Quantifying Greenhouse Gas Mitigation Measures," (August 2010)
    - California Energy Commission, "Energy Aware Planning Guide" (February 2011)
    - Salon, Deborah, "Quantifying the effect of local government actions on VMT," Prepared for the California Air Resources Board and the California Environmental Protection Agency (September 2013)

11. *Didn't SB 743 make other changes to CEQA related to infill projects?*

    Yes. SB 743 created a new exemption from CEQA for certain projects that are consistent with a Specific Plan. (See New Public Resources Code Section 21155.4.) SB 743 also provides that certain types of infill projects are not required to analyze aesthetic impacts or impacts related to parking. (New Public Resources Code Section 21099, subd. (d).) Those changes went into effect January 2014. Additional information regarding those provisions is available here.

12. *When would the new rules go into effect?*

    OPR released a ***preliminary discussion draft*** on August 6, 2014. That draft will likely undergo significant revisions in response to public input. After a full public vetting, OPR will then submit a draft to the Natural Resources Agency, which will then conduct a formal rulemaking process. That rulemaking process will itself entail additional public review, and may lead to further revisions. New rules would not go into effect until after the Natural Resources Agency adopts the new Guidelines, and the package undergoes review by the Office of Administrative Law. Notably, the new Guidelines would apply prospectively only, and would not affect projects that have already commenced environmental review.

Appendix B

Vehicle Miles Traveled, Air Quality and Energy

Vehicle travel leads to a number of direct and indirect impacts to the environment and human health. Among other effects, loading additional vehicle miles traveled, or VMT, onto the roadway network leads to increased emissions of air pollutants, including greenhouse gases, as well as increased consumption of energy. Some direct effects of increased VMT are described below.

Air Pollution

In California, transportation is associated with more greenhouse gas emissions than any other sector. Increased tailpipe emissions are a direct effect of increased VMT.

As VMT increases, so do carbon dioxide (CO2), (Chester and Horvath, 2009) methane (CH4), and nitrogen dioxide (N20) emissions. (U.S. Environmental Protection Agency, Emission Facts: Greenhouse Gas Emissions from a Typical Passenger Vehicle (February 2005).) The U.S. Environmental Protection Agency estimates that model 2005 passenger vehicles in the US emit an average of 0.0079 grams of N2O and 0.0147 grams of NH4 per mile. (U.S. Environmental Protection Agency, Climate Leaders Greenhouse Gas Inventory Protocol Core Module Guidance: Direct Emissions from Mobile Combustion Sources (May 2008).) Other air pollutants also directly result from increased VMT. Per mile traveled, California's light vehicles emit:

- 2.784 grams of CO
- 0.272 grams of NOX
- 0.237 grams of ROC (reactive organic gases, similar to volatile organic compounds)

(California Air Resources Board, Methods to Find the Cost-Effectiveness of Funding Air Quality Projects (May 2013).) While technological improvements are reducing vehicle emissions, those improvements are being eroded by a dramatic increase in vehicle miles traveled. (U.S. Environmental Protection Agency, Our Built and Natural Environments 2nd Ed. (June 2013).)

Energy

In addition to generating air pollution, vehicle travel can consumes substantial amounts of energy. Over 40 percent of California's energy consumption occurs in the transportation sector. (See California Energy Commission, "Energy Aware Planning Guide" (February 2011).) Passenger vehicles account for 74 percent of emissions from the transportation sector. (*Ibid*.)

Appendix C

Technical Considerations in Assessing Vehicle Miles Traveled

Many practitioners are familiar with accounting for vehicle miles traveled, commonly referred to as VMT, in connection with long range planning, or as part of the analysis of a project's greenhouse gas emissions or energy impacts. This Appendix provides background information on how vehicle miles traveled may be assessed as part of a transportation impacts analysis under the California Environmental Quality Act.

What VMT to Count

The simplest and most straightforward counting method is to simply estimate VMT from trips generated or attracted by a project (i.e., from trips made by residents, employees, students, etc.). This method is known as trip-based VMT. Agencies with access to more sophisticated modeling capabilities have can examine VMT in a more comprehensive manner, examining projected travel behavior, including effects the project has on other trip segments. For projects that might replace longer trips with shorter ones, a lead agency might analyze total area-wide VMT to see whether it would decrease were the project to be built. These methods are described below. [Additional background information regarding travel demand models is available in the California Transportation Commission's "2010 Regional Transportation Plan Guidelines," beginning at page 35.]

Trip-based VMT

Trip-based VMT includes all VMT from trips that begin or end at the project. It answers the question, "How much driving would be needed to get people to and from the project?" Standard 4-step travel demand models can measure trip-based VMT. For residential development, trip-based VMT is called home-based VMT.

Tour-based VMT

A tour is defined as a series of trips beginning and ending at the residence. Tour-based VMT includes all VMT from the entire tour that includes a stop at the project. As such, it captures the influence the project has on broader travel choices; for example, a project which is accessible by automobile can influence a traveler to choose travel by automobile for their day's needs, and this choice necessitates automobile use along the rest of their tour, which in turn can influence destination choices. Tour-based models, which are typically activity-based models, model entire tours rather than trips. Tour-based VMT for a residential development, for example, would count all the travel undertaken by its residents; this is called household VMT.

A shortcut: mapping trip- and tour-based VMT

Trip- or tour-based travel can be calculated on a project-by-project basis, but it is also possible to use a travel demand model to map the VMT of existing development. Because the travel behavior of new development tends to mimic that of existing development, such maps could be used to estimate VMT from new development in those locations.

Area-wide VMT

An area-wide analysis compares total VMT with and without the project. It answers the question, "What is the net effect of the project on area VMT?" The area for analysis should be chosen to capture the full VMT effects of the project; it should avoid truncating the analysis. In some cases, a strategically located project can reduce the total amount of VMT by substituting shorter trips for longer ones. For example, a grocery store in an area that previously had none could allow shorter shopping trips to substitute for longer ones. The area-wide VMT method should also be used when calculating the VMT impacts of transportation infrastructure projects.

Choosing a Denominator

A transportation analysis for a land use project should measure transportation efficiency, rather than the total amount of VMT generated. Therefore, a VMT metric used for trip- or tour-based assessments should include a denominator. Typical denominators include per capita for residential, per employee for office, and per trip for other uses. Per person-trip is another option that could be used for all land use types. Note, examination of area-wide VMT typically does not include a denominator, because the objective is to examine the magnitude of increase or decrease in total VMT.

Measuring VMT for Land Use Projects

The proposed Guidelines suggest that projects generating or attracting greater than regional average VMT may be an indication of a significant transportation impact. Similarly, the proposed Guidelines suggest that a net reduction in VMT may be an indication of a less than significant impact. The paragraphs below provide additional detail on how an agency might make those determinations.

Calculating Regional Average VMT

When comparing project VMT to regional average VMT, the same denominator and VMT counting method (trip-based or tour-based) should be used. For example, a trip-based VMT analysis for a residential project, which estimates home-based VMT per capita, should be compared with the regional total home based VMT divided by the total regional population. Totals should be taken over the entire region, i.e. the full geography of the MPO or RTPA.

Demonstrating a Reduction in Area-Wide VMT

The area-wide method of counting VMT may be used to determine whether total VMT increases or decreases with the project. The area chosen for analysis should cover the full area over which the project affects travel behavior.

Transportation projects should assess VMT using the area-wide method. Transit and active transportation projects can generally be presumed to reduce total VMT, unless substantial evidence demonstrates otherwise, because their largest effect on VMT is typically mode shift away from automobile use. Projects that increase physical roadway capacity typically induce additional vehicle travel, generally leading to increases in total VMT. However, a roadway project that improves connectivity can, in some cases, shorten trip lengths sufficiently to outweigh the induced travel effect, leading to an overall reduction in VMT.

Appendix D

Sample Trip-Based VMT Calculation

This sample describes the steps in estimating the vehicle miles traveled associated with a project. In this example, a 100 unit residential subdivision is proposed in a low-density large lot development pattern (i.e., one unit per 5 acres). This type of pattern has no mix of uses and relatively long distances to jobs, schools, and services. As such, residents typically have to rely on private vehicles for any trip and each trip is many miles. With no mix of uses, no 'internal' vehicle trips are projected to occur. To estimate daily VMT for the project, the following steps are used.

1. Multiply the number of residential units (100) by an average vehicle daily trip rate. This rate can be obtained by conducting local surveys of at least three similar sites, but in absence of this data, the analyst can rely on the ITE *Trip Generation Manual*. The manual contains an average daily vehicle trip rate for single family detached homes of 9.52. It should be noted that this rate only captures trip to/from the home (i.e., home-based work (HBW) and home-based other (HBO)) and not all trips made by the residents of the home.

   100 single-family detached residential dwelling units x 9.52 vehicle trips per unit =

   952 daily vehicle trips

2. Multiply the number of home-based trips by trip lengths. If trip lengths are available by trip purpose, then the trip generation estimate should be divided into purposes based on household survey data or travel forecasting model estimates. Potential sources for trip lengths by purpose are available through the California Household Travel Survey, the National Household Travel Survey, and MPO model estimates. In this simple estimate, only one trip length is assumed to be available and it represents the average weekday trip length for California based on the National Household Travel Survey.

   952 daily vehicle trips x 10 miles per trip = 9,520 daily VMT

   9,520 daily VMT/100 residential units =

   95.2 daily VMT per residential unit

3. Divide by the expected average project household occupancy. A specific estimate based on project characteristics (i.e. unit sizes and number of bedrooms) and location is preferable. Here we use the average for Sacramento County, 2.69 persons per household:

   95.2 daily VMT generated per residential unit / 2.69 persons per unit =

   35.4 daily VMT per capita

Appendix E

Estimating VMT From Roadway Capacity Increasing Projects

Introduction

CEQA requires analysis of a project's potential growth-inducing impacts. (Public Resources Code § 21100(b)(5); State CEQA Guidelines, § 15126.2(d).) Many agencies are familiar with the analysis of growth inducing impacts associated with water, sewer and other infrastructure. As part of its effort to reform the analysis of transportation impacts in the CEQA Guidelines, the Office of Planning and Research is proposing criteria for determining the significance of growth-inducing impacts related to transportation projects. This document provides additional background and information related to induced travel.

Because a roadway project can induce substantial vehicle miles traveled, or VMT, incorporating estimates of induced travel is critical to calculating both transportation and other impacts of a roadway expansion project. Induced travel also has the potential to reduce congestion relief benefits, and so any weighing of cost and benefit of a highway project will be inaccurate if it is not fully accounted for.

How Does Roadway Capacity Relate to Throughput?

The capacity of a road is the maximum number of vehicles per hour that the road can service. Throughput, meanwhile, is the number vehicles per hour that the road is servicing at any given time. In general, adding lanes to roads increases capacity. The magnitude of the increase depends on the type of lane (e.g. general purpose lanes, managed lanes, auxiliary lanes).

When a roadway is serving vehicles at capacity, adding more vehicles will disrupt traffic flow causing speed reductions (i.e., congestion) and reduce throughput. Conversely, reducing the number of vehicles entering a congested roadway will reduce congestion and increase throughput. So, travel demand management programs or traffic systems management programs that reduce vehicle miles traveled loaded onto a roadway can improve throughput without increasing capacity.

What is Induced VMT?

Additional roadway capacity may lead to additional VMT, a phenomenon known as induced travel, or induced VMT. It occurs when congestion is already present and a capacity expansion will lead to an appreciable reduction in travel time. With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT:

- **Longer trips.** The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are further away, increasing trip length and VMT.
- **Changes in mode choice.** When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases VMT.

- **Route changes.** Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease VMT depending on whether it shortens or lengthens trips.
- **Newly generated trips.** Increasing travel speeds can add trips, which increases VMT. For example, an individual who previously telecommuted or purchased goods on the internet might choose to travel by automobile as a result of increased speeds.
- **Land Use Changes.** Faster travel times along a corridor lead to land development further along that corridor; that development generates and attracts longer trips, which increases VMT.

These effects operate over different time scales. For example, changes in mode choice might happen immediately or within a few years, while land use changes typically take a few years or longer.

Has Induced VMT Been Studied?

On the whole, evidence links highway capacity expansion to VMT increases. Numerous studies have estimated the magnitude of the induced travel phenomenon. Most of these studies express the amount of induced travel as an "elasticity," which is a multiplier that describes the percent increase in VMT resulting from a given percent increase in lane miles of new roadway capacity. Many distinguish "short run elasticity" (increase in vehicle travel in the first few years) from "long run elasticity" (increase in vehicle travel beyond the first few years). Long run elasticity is typically larger than short run elasticity, because as time passes, more of the components of induced travel materialize. Generally, short run elasticity can be thought of as excluding the effects of land use change, while long run elasticity includes them. Most studies find long run elasticities between 0.6 and just over 1.0 (California Air Resources Board *DRAFT Policy Brief on Highway Capacity and Induced Travel*, p. 2.)

How Would an Agency Estimate Induced VMT for Proposed Projects?

Transportation analysis undertaken for transportation infrastructure projects typically requires use of a travel demand model. Proper use of a travel demand model will yield a reasonable estimate of short run induced VMT, generally including the following components:

- Trip length (generally increases VMT)
- Mode shift (generally shifts from other modes towards automobile use, increasing VMT)
- Route changes (can act to increase or decrease VMT)
- Newly generated trips (generally increases VMT; note that not all travel demand models have sensitivity to this factor, so an off-model estimate may be necessary)

Estimating long run induced VMT requires consideration of changes in land use. At a minimum, VMT resulting from land use changes induced by the project should be acknowledged and discussed. The analysis should disclose any limitations related to VMT forecasting that may have not been sensitive to induced travel effects and how these effects could influence the analysis results. Quantitative analysis is also possible using integrated transport and land use models or by relying on expert panels employing techniques such as the Delphi method. Once developed, the estimates of land use changes can then be analyzed by the travel demand model to assess VMT effects.

Alternately, the travel demand model analysis can be performed without an estimate of land use changes, and then the results can be compared to empirical studies of induced travel found in the types of studies described above. If the modeled elasticity falls outside of that range, then the VMT estimate can be adjusted to fall within the range, or an explanation can be provided describing why the project would be expected to induce less VMT than the subjects of those studies. (For an example of an EIR that includes a number of these elements, see *Interstate 5 Bus/Carpool Lanes Project Final EIR, pp. 2-52--2-56.*)

Example Outline for induced Travel Analysis

The following is a sample outline for describing induced VMT in the analysis of a project which includes a roadway capacity increase:

- Description of potential sources of induced travel due to the project alternatives resulting from
    - Longer trips
    - Changes in mode choice
    - Route changes
    - Newly generated trips
    - Land Use Changes
- If an estimate of land use change resulting from project alternatives is available from an expert panel or a land use model, that estimate should be used in the travel demand model to estimate VMT. Alternately, include:
    - A calculation of the long run elasticity of induced VMT for each project alternative (change in VMT divided by change in lane miles)
    - A comparison of that elasticity to empirical studies OR an estimate of land use changes
    - A discussion of potential sources for error in the induced travel estimate made by the travel demand model
    - An estimate of induced VMT that provides a best estimate correction to the results from the travel demand model

Variations in Induced VMT by Lane Type

The amount of VMT induced by a roadway capacity expansion depends on the amount of capacity added. All else being equal, as capacity is added, more VMT would be induced. Different types of lanes induce different amounts of VMT because they have different capacities or different abilities to influence travel time. Travel demand models can reflect these distinctions, as the capacities of lane types are programmed into the model and they are sensitive to travel time.

General purpose lanes can be used by any vehicle, and tend to exhibit the greatest vehicle capacity. Managed lanes are designated for use by vehicles occupied by at least a certain number of passengers (HOV lanes), those vehicles plus ones that have paid a toll (HOT lanes), or only ones that have paid a toll (Toll lanes). They are typically managed to prevent congestion by placing a restriction on the vehicles that may use the lane. Typically the target throughput is somewhat below capacity, for the purpose of having the managed lane maintain a speed advantage over the general purpose lanes. Thus, effective capacity of a managed lane is typically reduced.

Auxiliary lanes are defined as lanes that are only one link in length (starting at an on ramp and terminating at the next off ramp). The purpose of an auxiliary lane is to provide additional roadway capacity to accommodate the weaving that takes place near ramps as vehicles maneuver to enter or exit the freeway. Auxiliary lanes add capacity to a roadway, but near ramps their capacity is reduced, because cars are weaving into and out of them require extra space. Portions of an auxiliary lane away from ramps behave like a general purpose lane. Auxiliary lanes of approximately 1 mile or less in length can generally be assumed to have a reduced capacity along their full length, but longer auxiliary lanes may function like general purpose lanes. (See, Sacramento Area Council of Governments, Sacramento Activity-Based Travel Simulation Model: Model Reference Report, at p. 3-3.)

Transit lanes, which are designated for transit vehicles only, and truck lanes, which are designated for freight vehicles only, do not directly provide capacity for private passenger vehicles. However, these lane types attract trucks or transit vehicles from general purpose lanes, freeing up capacity in those lanes, and as a result can induce private passenger vehicle travel.

Mitigation and Alternatives

Induced travel has the potential to reduce congestion relief benefits, increase VMT, and increase other environmental impacts that result from vehicle travel. These effects may be considered potential impacts requiring consideration of mitigation or the development of alternatives. If the impact is determined to be significant, the lead agency must consider feasible measures to mitigate the impact, or consider project alternatives. In the context of increased travel induced by capacity increases, appropriate mitigation and alternatives that a lead agency might consider include managing the new lane or improving the passenger throughput of existing lanes. For example, a planned general purpose lane could instead be built as an HOV or HOT lane, reducing induced VMT. Travel demand management off site can also reduce VMT.

Appendix F

Available Models for Estimating Vehicle Miles Traveled

Overview

Our ability to anticipate the transportation outcomes of land use development has increased greatly in recent years. Research undertaken by academics, consulting firms, and public agencies provide the basis for estimating future vehicle travel, and advances in computing power have allowed more sophisticated application of that research.

Models range in complexity and sensitivity to factors that can influence vehicle miles traveled, or VMT. Simpler tools make assumptions, but are easier to implement. More complex models consider more variables, but are not always necessary or feasible. Models generally fall into one of two categories:

Sketch models use statistical characterizations of land use projects and transportation networks to estimate project VMT. For example, a sketch model might characterize the transportation network using statistics like intersections per square mile and number of transit stops per day within a half mile, rather than actually containing a detailed representation of the network itself. They range in sophistication from simple spreadsheet tools, which often require a smaller number of inputs and are therefore easier to use but sensitive to fewer variables, to complex software packages. A number of sketch models can be downloaded free of charge.

Three sketch models commonly used in California include:

- Urban Emissions Model (URBEMIS) - *California Air Resources Board*
- California Emissions Estimator Model (CalEEMod) – *California Air Pollution Control Officers' Association*
- EPA Mixed-Use Development Model (MXD) - *U.S. EPA*

Travel demand models represent links and nodes in the transportation network explicitly rather than statistically. As a result, they generally require more data, maintenance, and run time than sketch models. Because of their greater complexity, and because their use is typically required for various statutory functions (e.g. determining air quality conformity), travel demand models are maintained by all MPOs and RTPAs, and also by some cities and counties. For this reason, a regional travel demand model already exists in most locations and can be used to develop estimates of VMT. Because they represent the transportation network explicitly, travel demand models are required when analyzing the VMT impacts of transportation projects.

Travel demand models can supply inputs for sketch models, particularly trip lengths; a single travel demand model run can supply these inputs for sketch model runs throughout the region. Travel

demand models can also be used to develop maps depicting VMT generation across the model's geography, providing a quick method for estimating VMT of a project in a certain location.

Catalog of Models

This section catalogs many of the models that generate estimates of VMT. Some were primarily designed to estimate project VMT, while others calculate VMT primarily in order to estimate GHG emissions and/or other outcomes. Please note, this inventory of possible models should not be construed as an endorsement of any particular model.

Name: VMT+

Developer: Fehr and Peers

Year: 2013

Accessibility: Free, only web browser and Internet access required

Description: This free website functions like a spreadsheet tool, estimating weekly VMT and GHG by the size and type of land uses developed. The calculation is based on trip generation. ITE data are provided as a default for "Average Western US City" and for four California metropolitan areas. All default data (including trip generation, average trip length, and internal trip rates) can be replaced with project specific information. This tool is useful for development projects or land use plans of various sizes.

URL: http://www.fehrandpeers.com/vmt

Name: RapidFire

Developer: Calthorpe Associates

Year: 2011

Accessibility: Paid, spreadsheet software (e.g. Microsoft Excel) required

Description: This spreadsheet tool can estimate VMT and GHG, among many other factors, and is appropriate for a neighborhood and larger scale development. RapidFire, as deployed during the Plan Bay Area project in the San Francisco Bay Area, applies a user-friendly web interface to allow the public to explore the VMT and GHG outcomes of their development preferences.

URL: http://www.calthorpe.com/scenario_modeling_tools

Documentation:
http://www.calthorpe.com/files/Rapid%20Fire%20V%202.0%20Tech%20Summary_0.pdf

Name: Transportation Emissions Guidebook and Calculator

Developer: Center for Clean Air Policy

Year: 2007

Accessibility: Free, spreadsheet software (e.g. Microsoft Excel) required

Description: This spreadsheet tool uses a trip generation model to estimate neighborhood VMT and GHG, and then estimates the impact of 19 mitigation strategies. Required inputs include present day mode share, trip generation rates, and average trip length. This model is unique among those listed here in that it includes school siting as a potential VMT mitigation strategy.

URL: http://www.ccap.org/safe/guidebook/guide_complete.html

Documentation:

http://www.ccap.org/guidebook/CCAP%20Transportation%20Guidebook%20(1).pdf

Name: Sketch7 VMT Spreadsheet Tool

Developer: UC Davis Institute of Transportation Studies

Year: 2012

Accessibility: Free, spreadsheet software (e.g. Microsoft Excel) required

Description: This Excel spreadsheet and online GIS application use elasticities for seven "D's" (density, diversity, distance, design, destination, demographics, and development scale) to compare site or neighborhood plans, and estimate the VMT and GHG produced by each.

URL: http://ultrans.its.ucdavis.edu/projects/improved-data-and-tools-integrated-land-use-transportation-planning-california

Documentation:
http://downloads.ice.ucdavis.edu/ultrans/statewidetools/Appendix_G_VMT_Spreadsheet_Tool.pdf

Name: COMMUTER

Developer: United States Environmental Protection Agency (U.S. EPA), Cambridge Systematics, Inc.

Year: 2011

Accessibility: Free, spreadsheet software (e.g. Microsoft Excel) required

Description: This spreadsheet tool estimates the impact on VMT and GHG of several common transportation demand management strategies, including pricing/subsidy, transit improvements, carpooling, and telecommute promotion. The model allows the user to provide baseline mode share, trip generation and length, and population as inputs, or alternately can provide defaults from MOBILE6.

URL: http://cfpub.epa.gov/crem/knowledge_base/crem_report.cfm?deid=74941

Documentation: http://www.epa.gov/otaq/stateresources/policy/transp/commuter/420b05017.pdf

Name: Envision Tomorrow

Developer: Fregonese Associates, U.S. Office of Housing and Urban Development (HUD)

Year: 2014 (version 3.4)

Accessibility: Free, spreadsheet software (e.g. Microsoft Excel) required

Description: This suite of linked spreadsheets allows users to "paint" changes to land use and transportation at the neighborhood or site level and model the resulting impacts on travel behavior. Inputs include employment characteristics, intersection counts, transit coverage, and assumed average vehicle speeds. The spreadsheets use trip generation rates to estimate VMT and GHG. Envision Tomorrow is distributed under a Creative Commons license, is free to use, and is open source.

URL: http://www.envisiontomorrow.org/site-level-travel-model

Documentation: http://www.envisiontomorrow.org/storage/user_manuals/20131029ENVISION%20TOMORROW%20PLUS_USER%20MANUAL_1st%20COMPLETE%20VERSION_updated_sm2.pdf

Name: Urban Emissions Model (URBEMIS)

Developer: California Air Resources Board (CARB)

Year: 2007

Accessibility: Free

The Urban Emissions Model (URBEMIS) was developed to model VMT and GHG from new development, and is appropriate for small and large site developments. The tool was developed with the support of California air districts, and is free to download and use. As it was designed with local data, URBEMIS is used across California, including in the San Joaquin Valley. It has faced and passed legal challenges. The model calculates impacts from many mitigation measures, including affordable housing, free transit passes, and transit availability, as well as decisions throughout the construction phase.

URL: http://www.urbemis.com

Documentation: http://www.urbemis.com/support/manual.html

Name: California Emissions Estimator Model (CalEEMod)

Developer: California Air Pollution Control Officers Association (CAPCOA)

Year: 2013

Accessibility: Free

Description: This user-friendly tool is appropriate for any size site development, and estimates VMT and GHG based on the size and land use(s) of the project. The model integrates with the California Air Pollution Control Officers Association (CAPCOA) Quantification of GHG Mitigation Measures.

URL: http://www.caleemod.com

Documentation: http://www.aqmd.gov/caleemod/user's-guide

Name: Smart Growth INDEX 2.0

Developer: United States Environmental Protection Agency (U.S. EPA), Criterion Planners/Engineers

Year: 2002

Accessibility: Free

Description: This tool requires users to upload a map of the project's surrounding neighborhood into a GIS system such as ESRI ArcMap. Inputs (shapefile format) include: land use, transportation, demographics, housing, and other community features. Once uploaded, users can configure and compare development scenarios, projecting 56 indicators that include VMT and GHG. Designed for stakeholder engagement, the tool can be set to rank the performance of multiple scenarios by community-defined metrics.

URL: http://www.epa.gov/smartgrowth/topics/sg_index.htm

Documentation: http://www.epa.gov/dced/pdf/4_Indicator_Dictionary_026.pdf

Name: Low-Carb Land

Developer: Sonoma Technology, Inc., Washington State Department of Transportation

Year: 2011

Accessibility: Paid

Description: This sketch-planning tool is intended primarily for site development in suburban and rural areas because it uses simple and high-level inputs, and doesn't account for the complexities of more centrally-located development. Users model a base case and one or more project scenarios. Aside from location, the other inputs are the "5 D's" commonly discussed in VMT mitigation: density, diversity, destination, distance and design. The tool incorporates prevailing VMT rates and elasticities for the area.

URL: http://www.sonomatech.com/project.cfm?uprojectid=672

Documentation: http://www.trpc.org/regionalplanning/transportation/Documents/Modeling/Low-Carb%20Land_TRB%20Presentation_2011.pdf

Name: CommunityViz

Developer: Placeways

Year: 2014 (version 4.4)

Accessibility: Paid, ESRI ArcGIS required

Description: CommunityViz, is a model designed to facilitate an engaging experience between planners and the public. Optional inputs include demographic data, transportation network characteristics, land use, water use, and jobs. Outputs include VMT and GHG. The user-friendly, interactive interface was designed to invite community members step up during public meetings, enter their own preferences, and then model and display the results in real-time, using with 3-D visualizations, charts, and maps.

URL: http://placeways.com/communityviz/

Documentation:
http://placeways.com/communityviz/resources/downloads/items/WhitePaperIndicators2011.pdf

Name: Transportation Impacts of Mobility Management Strategies (TRIMMS)

Developer: United States Environmental Protection Agency (U.S. EPA), Center for Urban Transportation Research, University of South Florida

Year: 2012

Accessibility: Free, spreadsheet software (e.g. Microsoft Excel) required

Description: Using constant elasticities of demand, TRIMMS predicts VMT and GHG changes brought about by the application of several mitigation strategies, including Smart Growth land use development, transit fare reduction, transit service enhancements, and parking pricing. TRIMMS also estimates GHG emissions.

URL: http://www.nctr.usf.edu/abstracts/abs77805.htm

Documentation: http://ntl.bts.gov/lib/43000/43600/43635/77932-final.pdf

Name: Emme

Developer: INRO (Canada)

Year: 2014 (version 4.1)

Accessibility: Paid

Description: Used in the United States and internationally, Emme is a desktop-based model that uses neighborhood-level household information to estimate the impacts of a variety of transportation policy and infrastructure decisions, including transit service, bicycle facilities, carpooling, and tolling. Emme is appropriate for neighborhood-level development and outputs VMT and GHG.

URL: http://www.inro.ca/en/products/emme/index.php

Name: I-PLACE3S

Developer: Parson Brinkerhoff, Freonese Calthorpe Associates

Year: 1996

Accessibility: Free, ESRI ArcGIS required

Description: I-PLACE3S was launched in 2002 as a web-based modeling tool commissioned by the California Energy Commission, and is appropriate for larger developments and plans. The model works by developing a comprehensive land use and transportation network for a base year, before estimating effects of the development on VMT and GHG, among other variables. I-PLACE3S has a user-friendly interface, and is currently being used in several cities across the United States.

URL: http://www.smartcommunities.ncat.org/articles/place3s.shtml

Documentation: http://www.smartcommunities.ncat.org/pdf/places.pdf

Name: Surface Transportation Efficiency Analysis System

Developer: Federal Highway Administration (FHWA), Cambridge Systematics, Inc.

Year: 1997

Accessibility: Free

Description: Though STEAM requires substantial base year data; it is well suited for exploring many VMT mitigation strategies in a sub-region or along a corridor. Inputs include baseline vehicle occupancy, trip length, and population as well as several elasticities. Outputs include VMT and GHG.

URL: https://www.fhwa.dot.gov/steam/products.htm

Documentation: https://www.fhwa.dot.gov/steam/20manual.htm

Name: Urban Footprint

Developer: Calthorpe Associates

Year: 2012

Description: Developed for the Vision California process, this web-based tool allows users to estimate VMT and GHG at a large site or neighborhood scale. Urban Footprint also outputs land consumption, fiscal impact (household and government), household resource use, and public health. Within California, Urban Footprint is currently being used by the Sacramento Area Council of Governments (SACOG), San

Diego Association of Governments (SANDAG) and the Southern California Association of Governments (SCAG).

URL: http://www.calthorpe.com/scenario_modeling_tools

Documentation: http://www.calthorpe.com/files/UrbanFootprint%20Technical%20Summary%20-%20July%202012.pdf

Name: UrbanSim

Developer: Synthicity

Year: 2014 (ongoing open source improvements)

Accessibility: Free, ESRI ArcGIS required

Description: UrbanSim is an open-source transportation and land use scenario-planning tool, which can model VMT and GHG, among many other outcomes. The Metropolitan Transportation Commission (MTC) applied UrbanSim to forecast its Plan Bay Area outcomes. Modeling site and neighborhood development with UrbanSim is most feasible if the surrounding region already uses UrbanSim.

URL: http://www.urbansim.org/Main/UrbanSim

Documentation: https://github.com/synthicity/urbansim/wiki

Name: EPA Mixed-Use Development (MXD) Model

Developer: United States Environmental Protection Agency (U.S. EPA)

Year: 2007

Accessibility: Free, spreadsheet software and ESRI ArcGIS required

Description: The MXD Model is a spreadsheet tool designed to model VMT production from project sites and neighborhoods that apply Smart Growth principles. The model must integrate with a desktop GIS application, and for inputs, it requires household and employment characteristics, intersection density, and transit availability.

URL: http://www.epa.gov/smartgrowth/mxd_tripgeneration.html

Name: MXD+ / Plan+ / TDM+ Toolkit

Developer: Fehr and Peers

Year: 2013

Accessibility: Paid

Description: These proprietary tools build on the EPA MXD model, estimating VMT for site and neighborhood-scaled development. MXD+ adjusts trip generations rates downward for mixed use development. Plan+ introduces new land use mitigations (parking pricing, connection to transit, bicycle parking) to estimate further reductions. TDM+ models the effects of the CAPCOA Guideline mitigations.

URL: http://asap.fehrandpeers.com/tools/sustainable-development/plan

Name: CUTR_AVR

Developer: Federal Highway Administration (FHWA)

Year: 1999

Accessibility: Free

Description: The CUTR_AVR model is ideal for large office developments with 100 or more employees with innovative TDM programs. The model estimates the mode share and ridership effects of the TDM programs, which can be input into other models to estimate VMT and GHG. The model is based on a dataset including 7,000 employer TDM programs from three metropolitan areas in Arizona and California.

Information:
http://www.fhwa.dot.gov/environment/air_quality/conformity/research/transportation_control_measures/emissions_analysis_techniques/descriptions_cutr_avr.cfm

Download: http://www3.cutr.usf.edu/tdm/registercutravr.htm

Documentation: http://www3.cutr.usf.edu/tdm/pdf/CUTRAVR.PDF

Name: National Energy Modeling System (NEMS): Transportation Sector Module (TSM)

Developer: United States Department of Energy (DOE) Energy Information Administration

Year: 2001

Accessibility: Free

Description: This model focuses exclusively on the impact of changes in the vehicle fleet on VMT and GHG. Input data includes the vehicle fleet (personal, transit, and freight), fuel prices, fuel economy, passenger miles, population, income, and changes in costs and income.

URL: http://www.eia.gov/bookshelf/models2002/tran.html

Documentation: http://www.eia.gov/FTPROOT/modeldoc/m0702001.pdf

Name: VMT Impact Tool

Developer: California Air Resources Board (CARB)

Year: 2014

Accessibility: Free, spreadsheet software (e.g. Microsoft Excel) required

Description: This spreadsheet tool calculates the effect of changes in seven factors on VMT: pricing, transit utilization, job access, activity mix, active mode share, road network connectivity, and mixing of uses. It does not calculate absolute VMT quantities, but can be used to estimate the change in VMT that would result from policy changes. The results can be exported to GIS to visualize spatial relationships.

URL (Tool and Documentation): http://www.arb.ca.gov/research/single-project.php?row_id=64861

EXHIBIT K

Sustainability Best Practices Framework



About ILG's Sustainable Communities Program

The Institute's Sustainable Communities program helps local officials and staff identify and apply policies and best practices that support sustainable communities — places that foster and maintain a high quality of life for their residents on an ongoing basis. www.ca-ilg.org/Sustainability

Sustainability Best Practices Framework: Options to Consider

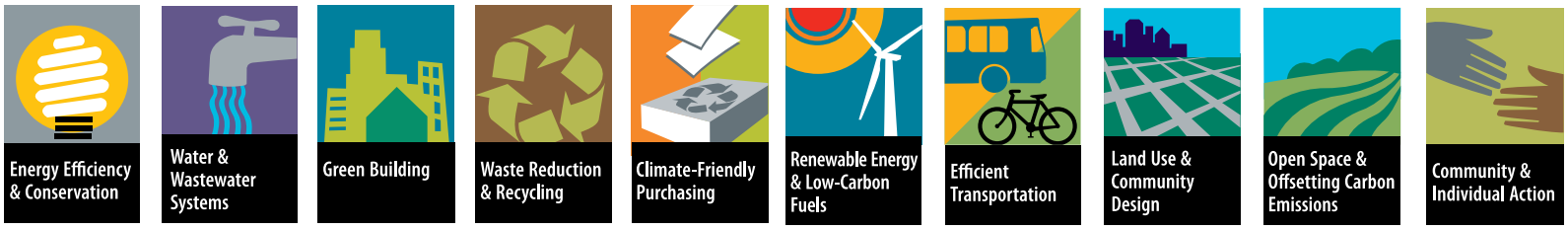
The Institute for Local Government's Sustainability Best Practices Framework offers options for local action in ten areas. They are drawn from practical experiences of cities and counties throughout California. The options vary in complexity and are adaptable to fit the unique needs and circumstances of individual communities.

Local officials and staff may use the framework in a variety of ways, including to:

- Generate ideas about programs and policies to pursue;
- Inform a comprehensive climate action planning process; or
- Integrate sustainability into general plan policies.

Many of the activities can lead to multiple benefits, including:

- Reduced greenhouse gas emissions;
- Energy, water, fuel and cost savings;
- Improved health; and
- Increased resilience to climate change impacts.



Feedback Welcome

The Sustainability Best Practices Framework highlights the ongoing good work at the local level to save energy and reduce greenhouse gas emissions. It is an evolving resource. New ideas are welcome, along with any materials or background information that may benefit local agencies. Please email us at sustainability@ca-ilg.org.

About the Institute for Local Government

The Institute for Local Government (ILG) is the nonprofit research affiliate of the League of California Cities and the California State Association of Counties. The Institute's mission is to promote good government at the local level with practical, impartial and easy-to-use resources for California communities. www.ca-ilg.org

The activities can also help make communities more attractive places to live, work and conduct business. Learn more about the co-benefits of sustainability strategies at www.ca-ilg.org/SustainabilityCo-Benefits

Updated Sustainability Best Practices Now Available

First released in 2008, the Sustainability Best Practices Framework has gone through several iterations, including the most recent 2013 update.

The new updates reflect activities local agencies, including cities and counties, participating in the Beacon recognition program have undertaken, technological advancements, and policy changes at the state level. Like the original Best Practices Framework, these updates have been peer-reviewed and reflect input from local and state officials, technical experts and others. www.ca-ilg.org/SustainabilityBestPractices

More Information to Support Local Efforts

Visit the Institute's website (www.ca-ilg.org/SustainabilityBestPractices) to read stories and watch videos (www.ca-ilg.org/BeaconAwardVideos) about local sustainability efforts from around California and to access resources to support efforts in the ten best practice areas.

Additionally, join the Institute's Sustainable Communities Learning Network LinkedIn group (www.ca-ilg.org/SCLNLinkedIn), which enables local agency sustainability practitioners to connect, exchange information, discuss best practices, and seek feedback directly from their peers.



Local Leadership Toward Solving Climate Change

About the Beacon Program

The Beacon program, sponsored by the Institute for Local Government and the Statewide Energy Efficiency Collaborative, recognizes and supports California cities and counties that are working to reduce greenhouse gas emissions, save energy and adopt policies and programs that promote sustainability. Learn about the Beacon program and participant accomplishments at www.ca-ilg.org/BeaconAward.

The program is funded by California utility customers and administered by Southern California Gas Company, San Diego Gas & Electric Company, Pacific Gas and Electric Company and Southern California Edison, under the auspices of the California Public Utilities Commission.

The Statewide Energy Efficiency Collaborative (SEEC) is an alliance to help cities and counties reduce greenhouse gas emissions and save energy. SEEC is a collaboration between three statewide non-profit organizations, including the Institute for Local Government, and California's four investor-owned utilities. www.californiaseec.org

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Energy Efficiency & Conservation

Options to Consider



Energy generation is the second largest source of greenhouse gas emissions. Thus, strategies to conserve energy and use it more efficiently in agency operations and the community help reduce greenhouse gas emissions. In addition, energy efficiency and conservation measures save money and resources.

For other energy-related best practices: see Green Building and Water and Waste Water Systems areas.

Agency

Audits and Assessment

- Audit energy use of agency buildings to identify opportunities for energy savings through efficiency and conservation measures.
- Use energy management software to monitor real-time energy use in agency buildings to identify energy usage patterns and abnormalities.
- Conduct commissioning and retro-commissioning studies of agency buildings, including equipment such as heating, ventiliation and air conditioning (HVAC) and lighting systems to ensure they are operating as designed and installed.
- Benchmark energy use of major agency buildings.

Internal Policies and Procedures

- Establish an energy efficiency and conservation policy that provides employees with behavioral guidelines for energy efficient use of the facility such as turning lights, copiers and computers off, appropriate thermostat use, etc.
- Establish energy efficiency and conservation protocols for building custodial and cleaning services and other contract employees.
- Adopt and implement a policy to reduce "plug" load in agency facilities by removing personal equipment such as desk lamps and space heaters or installing smart power strips.
- Implement a network cloud-computer system to reduce computer work station energy use.
- Incorporate energy efficiency features in agency data centers, such as through implementation of an information technology energy efficiency program.
- Adopt ENERGY STAR® purchasing standards for all new computer equipment, appliances and equipment.
- Require new agency buildings to exceed Title 24, California's energy efficiency building standard.
- Implement off-peak scheduling of pumps, motors, and other energy intensive machinery where possible.
- Implement a revolving loan fund or other mechanism to finance future energy investments in agency buildings and operations.
- Work with energy provider to access technical assistance and financial incentives, such as facility audits, rebates, on-bill financing, loans, savings-by-design and demand management programs.
- Require agency new construction to be net zero energy.

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- Train agency building inspectors to understand and enforce Title 24, California's energy efficiency building standard.
- Develop and implement shading requirements for agency buildings and other facilities.
- Require agency funded or supported affordable housing projects to incorporate energy efficiency features, equipment and appliances.
- Prepare and implement an Energy Action Plan for agency facilities.
- Participate in voluntary sustainability and climate change recognition program, The Beacon Award: Local Leadership toward Solving Climate Change to track and share agency energy savings accomplishments. www.ca-ilg.org/BeaconAward

Retrofits and Upgrades

- Develop and implement a schedule to address no cost/low cost energy retrofit projects.
- Develop and implement a schedule to address capital intensive energy retrofits projects.
- Reduce energy demand by capturing "day lighting" opportunities.
- Install motion sensors, photocells, and multi-level switches to control room lighting systems.
- Replace incandescent lights with more energy efficient lighting, such as compact fluorescents, overhead fluorescent lights or light-emitting diodes (LEDs).
- Upgrade exit signs with light-emitting diode (LED) lighting.
- Add vending misers to cold beverage machines.
- Upgrade pumps, motors and other energy intensive machinery where feasible.
- Replace agency appliances and equipment such as vending machines, refrigerators, and washing machines, with energy efficient models.
- Replace agency natural gas fueled appliances and equipment, such as boilers, stoves, water heaters, with high efficiency units.
- Replace and/or tint windows in agency-owned buildings to reduce heating by sunlight.
- Install cool roof systems on existing and new agency buildings.
- Install smart meters on agency buildings.

Tip: Evaluate agency electric bills to ensure each account is on the optimal rate schedule.

Outside Lighting

- Use "de-lamping" techniques to reduce lighting levels at parks, sports fields and parking lots, where appropriate for the location and use, considering security and decorative lighting issues.
- Change downtown holiday or decorative lighting to light-emitting diodes (LEDs) or other energy efficient lighting systems.
- Replace incandescent traffic and crosswalk lights with energy-efficient lighting such as light-emitting diodes (LEDs).
- Replace incandescent and mercury vapor street, parking lot, park and other outdoor lights with energy efficient alternatives, such as light-emitting diodes.

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Community

Working with Local Businesses

- Encourage community businesses to conduct energy audits and implement energy efficiency retrofits through activities such as energy efficiency workshops, energy fairs, agency websites and social media.
- Encourage businesses to install energy efficient exterior lighting that is appropriate for the location and use, considering security and decorative lighting issues.
- Collaborate with local retail businesses to encourage businesses to purchase energy efficient products.
- Promote and reward energy efficiency efforts of local retail businesses.
- Adopt an energy financing program, such as through a PACE (Property Assessed Clean Energy) financing district, to help businesses install energy efficiency retrofits in existing residential and commercial buildings.
- Require energy audits and/or retrofits for commercial properties at time of sale.
- Require new commercial buildings to exceed Title 24, California's energy efficiency standard, to the extent permitted by law.
- Require new commercial construction to be net zero energy.

Working with Homeowners and Apartment Owners

- Provide information about Energy Upgrade California™ to help homeowners increase energy efficiency.
- Provide rebates or other financial incentives to help residents pay for whole house retrofits.
- Sponsor a home energy makeover contest that includes energy efficient audit and improvements as prizes.
- Adopt an energy financing program, such as through a PACE (Property Assessed Clean Energy) financing district, to help homeowners install energy efficiency retrofits in existing residential buildings.
- Require energy audits and/or retrofits at time of sale for residential properties.
- Require energy audits and/or retrofits at time of residential remodeling or renovation projects.
- Require new residential buildings to exceed Title 24, California's energy efficiency standard, to the extent permitted by law.
- Require new residential construction to be net zero energy.

Working with Energy Providers

- Work with energy provider to encourage local businesses to implement energy efficiency strategies and retrofits.
- Work with energy provider to provide information to homeowners and businesses about available utility rebates for new residential and commercial buildings that exceed Title 24, California's energy code, by 15 percent or more.

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- Work with energy provider to promote use of utility financial incentives to assist residential and commercial customers improve energy efficiency, such as by using on-bill financing, loans and rebates and demand management programs, as appropriate for the customer.

Engaging the Community

- Host/support compact fluorescent light bulb, LED give-away or incandescent bulb exchange programs.
- Collaborate with schools and colleges to co-sponsor students to conduct energy audits and/or retrofits for agency buildings, businesses or homeowners.
- Upgrade foreclosed homes in the community with energy efficiency measures and solar photovoltaic or hot water systems.
- Prepare and monitor progress of implementing Energy Action Plan to reduce energy use in the community.

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Green Building

Options to Consider

Green buildings reduce energy consumption, use water more efficiently and utilize materials with recycled content, thus saving money and natural resources and related greenhouse gas emissions. Local agencies have taken a variety of approaches to embrace green building policies and programs, consistent with the unique characteristics of their individual communities.

Note: The California Green Building Standards Code, known as CALGreen, went into effect in 2011 for residential and non-residential new construction and major remodels. CALGreen is updated triennially with the next update going into effect January 2014. CALGreen includes options for stronger locally adopted standards. Several other green building rating systems, such as GreenPoint Rated and LEED® certification programs, provide options to consider for exceeding California's Green Building Code. **www.bsc.ca.gov/Home/CALGreen.aspx**

For other green building-related best practices: see Energy Efficiency and Conservation area.

Agency

- Adopt a policy that requires new agency buildings to exceed the minimum requirements of California's Green Building Standards Code (also known as CalGreen). Options to exceed the standard include CALGreen's built-in tiers and/or certification under Build It Green's Green Point Rated system, LEED®, or alternative certification program.
- Require agency buildings to exceed Title 24, Part 6, the State's Building Standard Code which establishes energy efficiency requirements for residential and non-residential new construction and major remodels.
- Incorporate materials that are renewable, reusable, recyclable, recycled, non-toxic and those that have zero or low volatile organic compounds (VOCs).
- Explore using alternate materials such as packed gravel or permeable concrete instead of conventional concrete or asphalt to enhance replenishment of ground water.
- Develop and implement sustainable landscaping standards for public agency facilities to reduce water consumption.
- Incorporate water efficient plants, trees, green roofs and rain gardens in agency landscaping.
- Use compost and mulch in agency landscaping as a water conservation measure.
- Require agency landscaping and parks to incorporate smart irrigation technology systems that save water rand energy.
- Require verification by a certified third-party rater to ensure compliance with green building standards for all newly built agency facilities.

Community

- Establish a green building awareness program to educate and encourage homeowners and builders to use green building techniques.
- Organize a sustainable building task force that includes representation from various fields within the building industry and other groups to evaluate feasibility of incorporating green building techniques that exceed the state standards into all new building and retrofit projects in the community.
- Create a dedicated page on the agency's website to help residents find green building information and resources.
- Provide information to homeowners and businesses about available utility rebates for new residences and commercial buildings that exceed California's Title 24 energy code by 15 percent.
- Provide incentives, such as expedited review/permit processing, to encourage green building.
- Provide technical and financial assistance and other significant incentives to development projects that meet or exceed specified standards under green building programs.

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Green Building continued



- Train appropriate agency staff (such as planners, inspectors, and plan checkers) in green building standards and technologies to facilitate the permitting approval and inspection processes.
- Adopt a policy that requires new homes, buildings or remodels to exceed the minimum requirements of California's Green Building Standards Code (also known as CalGreen). Options to exceed the standard include CALGreen's built-in tiers and/or certification under Build It Green's Green Point Rated system, LEED®, or alternative certification program.
- Adopt a "Solar Ready" ordinance, requiring all new residential buildings to be pre-wired and pre-plumbed for photovoltaic and solar hot water systems. (Required in the California Green Building Code January 1, 2014)
- Require new residential and commercial construction buildings to exceed Title 24 energy efficiency standards, to extent permitted by law.
- Require new and renovated commercial construction to incorporate smart irrigation technology systems that save water and energy.
- Require energy efficiency performance audits for specific types of residential and commercial remodeling projects.
- Require buildings, facilities or affordable housing developments using agency funds or other agency support to exceed minimum state green building or energy standards.
- Offer fee reductions, waivers, loans or grants to developers and contractors who commit to verifiable green building practices that exceed state or local minimum standards.
- Offer technical expertise and assistance for community members, builders and businesses undertaking green building projects.
- Work with neighboring jurisdictions, where feasible, to adopt a regional green building standard that exceeds the California Green Building Code Standard or Title 24 energy efficiency standards.
- Enact a construction and demolition debris recycling ordinance that requires 50 percent or more diversion of project waste.

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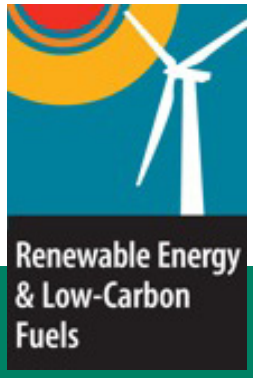

Renewable Energy and Low Carbon Fuels

Options to Consider

Energy generated from renewable sources produces less greenhouse gas emissions than energy generated from conventional sources. Low carbon fuels are those that are formulated to produce fewer greenhouse gas emissions.

For other renewable energy and low carbon fuels-related best practices: see Efficient Transportation and Waste Reduction and Recycling areas.

Agency

Solar Projects

- Replace traditional pedestrian "walk" signals and safety lights with solar powered signals.
- Install solar powered smart parking meters.
- Adopt a "Solar Ready" policy requiring new agency buildings to be pre-wired and pre-plumbed for solar photovoltaic and solar hot water systems. (Required January 2014 as part of the California Green Building Code.)
- Purchase solar photovoltaic systems or enter into power purchase agreements (PPA) to meet all or part of the electrical energy requirements of buildings and facilities owned, leased or operated by the agency.

Methane Recovery Programs and Projects

- For jurisdictions that own or operate landfills, recover and use the maximum feasible amount of methane gas from the landfill to produce electricity, fuel co-generation facilities, and/or produce compressed natural gas for use in alternative fuel vehicles.
- For jurisdictions that host landfills owned by private companies or other public agencies, enter into partnerships or agreements with agencies or companies that own or operate landfills to ensure that the maximum feasible amount of methane is recovered for waste-to-energy or other renewable energy projects.
- Install digesters and other technologies at wastewater treatment facilities to capture methane and other bio-fuels.
- Install fuel cells to generate power for wastewater treatment plants.

Fuel Efficient and Alternative Fuel Vehicles

- Establish and implement a policy to convert agency fleets, including agency owned, leased or operated vehicles, to alternative or fuel efficient vehicles.
- Establish and implement a policy to purchase new alternative or fuel efficient vehicles for agency operated transit systems.
- Use regional purchasing options or the California Department of General Services bulk purchasing program to buy green fleet vehicles from local auto dealers.
- Train agency fleet mechanics to service alternative and fuel efficient vehicles.
- Implement bike sharing program for agency employees traveling between agency facilities.
- Install bicycle racks, showers, and other amenities at agency facilities to promote bicycle use by agency employees and visitors.

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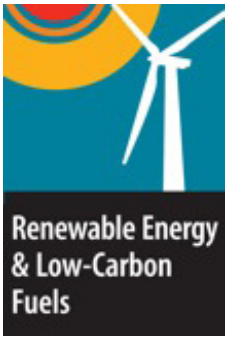

Community

Solar and Small Wind Projects

- Develop a map that residents can access online that identifies where solar projects are located in the community.
- Conduct renewable energy workshops for residential, commercial and industrial property owners.
- Offer workshops and information for residents and businesses to provide resources and permitting assistance for those interested in adding renewable energy systems to their properties.
- Provide information about the California Solar Initiative rebate and other renewable energy incentive programs on agency website.
- Work with solar photovoltaic system providers to establish a discounted bulk purchasing program for residents and businesses that wish to purchase and install solar photovoltaic systems on their buildings.
- Offer financial incentives to those who install solar photovoltaic or hot water systems on homes or businesses.
- Adopt a renewable energy financing program, such as through a PACE (Property Assessed Clean Energy) financing district, to help homeowners, multi-family dwellings and businesses install solar photovoltaic and hot water systems on existing residential and commercial buildings.
- Adopt policy or program that offers incentives, such as streamlined permitting system or fee waivers, to encourage installation of photovoltaic systems on new or existing residential and commercial buildings.
- Adopt a "Solar Ready" ordinance requiring new residential or commercial construction to be pre-wired and pre-plumbed for solar photovoltaic and solar hot water systems. (Required January 2014 as part of the California Green Building Standards Code.)
- Adopt an ordinance for small wind energy systems for residential and commercial installations.
- Adopt a solar photovoltaic system siting ordinance for systems proposed on agricultural and open space lands.

Fuel Efficient and Alternative Fuel Vehicles

- Work with electric utility to develop and implement electric vehicle charging infrastructure plan for the community.
- Develop permitting standards for installation of electric vehicle charging stations at residential and commercial buildings.
- Streamline the permitting process for installing home or business electric vehicle charging stations.
- Install electric vehicle charging stations at public facilities, such as at parking lots and airports, for community use.

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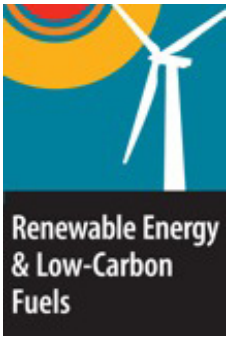

- Allow the public to use agency facilities that support use of alternate fuel vehicles, such as compressed natural gas fueling facilities and electric vehicle charging stations.
- Require new commercial developments to include electric vehicle charging stations in parking lots or garages.

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Water and Wastewater Systems

Options to Consider

Agency

Water and wastewater systems play an important role in sustainability for several reasons. First, energy is used to convey, pump, distribute, treat and heat water, so saving water saves energy. Second, experts agree that the effects of climate change will further reduce the availability of water. Therefore, efforts to conserve water will play an important role saving energy, reducing greenhouse gas emissions and securing water resources for the future.

For other water and wastewater-related best practices: see Green Building, Energy Efficiency and Conservation, and Land Use and Community Design areas.

Ensure Water Efficiency in Agency Buildings and Operations

- Audit agency's water and wastewater pumps and motors to identify most and least efficient equipment.
- Work with agency or company that provides water and wastewater service to implement a cycling and equipment replacement program for least efficient water and wastewater pumps and motors.
- Initiate a water loss program or "leak-audit" of agency water infrastructure.
- Upgrade and retrofit agency plumbing systems and appliances with water efficient technology and fixtures.
- Retrofit existing agency buildings and facilities to meet standards for the LEED® Standards Rating Systems for Existing Buildings (EB), Build It Green, Commercial Interiors (CI), or other equivalent standards.
- Incorporate water-efficient systems in new agency buildings that include opportunities for recycled water.
- Require dual plumbing for use of recycled water for new facilities.

Reduce Water Use in Parks and Landscaping

- Implement all feasible water efficiency strategies included in the Ahwahnee Water Principles for Resource Efficient Land Use in agency parks, landscaping and other new developments. (www.lgc.org/ahwahnee/h2o_principles)
- Install smart water meters to track water usage and the effectiveness of water efficiency activities and programs.
- Assess, maintain and repair existing irrigation systems to minimize water use, including parking lot landscaping, public rest rooms and parks, golf courses and other recreational facilities.
- Install weather-based smart irrigation systems in agency parks and landscaping areas.
- Adopt a water recycling master plan that connects parks into a recycled water system.
- Use recycled water for agency facilities and operations, including parks and medians, where appropriate.
- Convert all water distributing vehicles, such as street sweepers and tree-watering tankers, to use reclaimed water, where feasible.
- Reduce turf and grass in agency landscaped areas. Use native turf and grass, when applicable.
- Implement drought tolerant and hydro-design principles to group compatible plants based upon water needs for agency parks and landscaping.
- Use compost, biosolids and mulch in agency landscaping as a water conservation measure.

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Tip: For more information, visit ILG's Water Conservation Leadership Guide: Issues for Local Officials to Consider at www.ca-ilg.org/WaterConservationLeadership.

Create Safe and Efficient Water and Wastewater Systems

- Use non-toxic fertilizers in agency parks and landscaped areas to reduce contaminates in run-off.
- Create a Fats, Oils and Grease (FOG) Control Program to reduce blockages in the wastewater system.
- Reduce energy use by auditing agency's water and wastewater pumps and motors to identify most and least energy efficient equipment.
- Work with agency or company that provides wastewater service to implement an audit, cycling and equipment replacement program to increase energy efficiency for water and wastewater pumps and motors.
- Work with local wastewater service provider to determine whether biosolids can be recycled by using them on local landscaping, golf courses, community parks and other programs to improve soil quality and reduce irrigation needs.
- Promote methane capture and enhanced production through co-digestion of other organic waste streams for use as renewable energy at wastewater treatment plants.

Address Future Water Security

- Construct a new groundwater recharge facility that can hold additional surface water secured in wet years to eliminate possible groundwater overuse in the region.
- Create an urban runoff recycling facility.

Community

Promote Water Conservation

- Adopt water efficiency principles similar to the Ahwahnee Water Principles for Resource Efficient Land Use for new and existing residential and commercial developments. (www.lgc.org/ahwahnee/h2o_principles)
- Adopt a retrofit program to encourage or require installation of water conservation measures in existing businesses and homes that exceed state standards.
- Require water efficiency audits at point of sale for commercial and residential properties.
- Provide free faucet aerators, water-efficient shower heads and low flow hose nozzles to residents at community or other events.
- Pass a water-efficient landscaping ordinance stronger than state standards, where feasible.
- Develop a training program to educate local landscapers and agency personnel on practices that reduce the use of water and toxic pesticides.
- Create a water efficient demonstration garden that includes native and drought tolerant plants and requires low volume mulch, irrigation and other water saving features.
- Implement a lawn buy-back program for residents who convert sod or grass to drought-tolerant landscaping.

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Promote Water Recycling and Greywater Use

- Incentivize and promote the installation of residential greywater systems that meet appropriate regulatory standards.
- Develop a local ordinance to require all new homes to have a greywater system.
- Require dual plumbing for use of recycled water for new commercial and/or residential developments.
- Provide educational resources to encourage residents to harvest rainwater.

Educate about Water Pollution Prevention

- Install informational kiosks at agency parks to educate residents about stormwater pollution.
- Engage the public in riverbank planting events, storm drain marking or stream-cleanup programs.
- Promote bio-retention basins for stormwater collection and treatment prior to discharge.
- Promote local solutions for stormwater management, such as rain gardens, green roofs and detention ponds.
- Develop an educational community program or campaign that engages residents as watershed stewards.

Tip: Greywater is wastewater generated from domestic activities such as laundry, dishwashing and bathing, which can be recycled in-site for uses such as landscape and irrigation.

Note: For additional stormwater management practices, visit **www.epa.gov/stormwater/best_practices.htm**.

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Waste Reduction and Recycling

Options to Consider

The largest sources of human-generated methane, a potent greenhouse gas, comes from improperly managed landfills. Thus, waste reduction and recycling activities reduce the potential to generate methane at landfills, as well as reduces pollutants generated from transporting waste to disposal sites. Waste reduction and recycling also conserve natural resources.

Agency

Reduce

- Implement a comprehensive waste reduction and recycling program in agency offices and facilities.
- Create and facilitate an agency employee education program highlighting waste reduction and recycling best practices.
- Adopt a policy to encourage paper reduction through activities such as:
  - Promoting a "think before you print" campaign.
  - Reducing margins and logos on agency templates, letterhead and memos.
  - Using computer software that removes blank pages and images from documents.
  - Using "eCopy" copy machines that allow users to scan paper documents and distribute electronic copies via e–mail.
  - Uploading bid documents using online resources instead of printing hard copies for contractors.
  - Requiring fewer or smaller-sized copies of project plans or submittals.
  - Establishing a policy to use electronic devices (tablets, computers and projectors) for agendas and notes at meetings, such as for board of supervisor, city council or planning commission meetings.

Reuse

- Reuse unwanted printed material for other purposes, such as for scratch paper or shred for use at the local animal shelter.
- Reuse or redistribute to community non-profit groups office items such as supplies, computer, furniture and cell phones in order to divert items from the landfill.
- Host a community garage sale or swap meet for the community to sell or redistribute unwanted items.
- Incorporate reuse programs at publically owned landfills and transfer stations for diverting materials to non-profits.
- Provide and encourage the use of reusable dishes and drinkware at agency facilities.

Recycle

- Adopt a "Buy Recycled" policy for agency departments.
- Recycle or refill ink/toner cartridges, as appropriate.

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- Provide bins for collection of used batteries and compact florescent lights for proper disposal or recycling.
- Implement a partnership with other public agency offices located within the jurisdiction for green procurement, waste reduction and recycling at those facilities.
- Require all agency demolition projects to incorporate de-construction/ construction and demolition waste recycling or recovery practices.
- Adopt agency or community waste diversion and recycling goals that are higher than existing state law.
- Evaluate current community recycling infrastructure relative to future population growth and waste generation.
- Include provisions and incentives for new recycling infrastructure and facilities to accommodate growth in land use planning and zoning.
- Work with solid waste and recycling collection providers to calculate the carbon footprint of collection system.
- Work with solid waste and recycling collection providers to reduce collection system carbon footprint.

Organics

- Evaluate agency facilities and operations to identify opportunities to increase material recovery and beneficial use of organic material.
- Evaluate opportunities to convert agency organic waste into biofuels to use in agency vehicles.
- Distribute or post materials illustrating best practices for organics collection and composting.
- Establish a program to use the maximum amount of organic waste possible that is generated within the jurisdiction to produce compost for use on agency parks and landscaping.
- Create a vermicomposting (worm-bin) program with a complementary educational component at agency facilities, such as county detention centers and city jails.
- Approve siting of composting facility within jurisdiction.
- Distribute an annual newsletter highlighting agency and community waste reduction programs and accomplishments.

Businesses

- Coordinate with the California Department of Resources, Recycling, and Recovery (CalRecycle) on the latest information, resources and programs to assist local businesses. **www.calrecycle.ca.gov**
- Adopt a program or ordinance to encourage or require waste audits and waste reduction plans for existing and/or new commercial developments.
- In partnership with the waste hauler(s) serving the commercial sector, institute a comprehensive waste reduction and recycling program with financial and other incentives, such as a tiered rate system that charges less for collecting recyclable materials than for collecting solid waste, to promote waste reduction and recycling for commercial/industrial waste generators.

Note - California law now requires:

- All businesses that generate 4 or more cubic yards of waste weekly to recycle.
- Apartment communities/multi-family housing with 5 or more units to recycle.
- Apartment owners to offer recycling services to residents.
- Cities and counties to educate businesses about new recycling requirements.

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- Adopt a program or ordinance that exceeds state minimum standards by requiring businesses generating less than 4 cubic yards of waste a week to recycle.
- Work with local material collectors and economic development experts to recruit or retain regional recycling manufacturers.
- Adopt an ordinance to restrict the use of expanded-polystyrene containers at fast food restaurants and other establishments.
- Adopt a program or ordinance to restrict the availability of single-use bags at retail stores.
- Implement a green business program that rewards local businesses for sustainability measures.
- Implement a food scrap collection program for large food waste generators.
- Encourage local restaurants to use compostable foodware, where appropriate.
- Encourage local restaurants to create opportunities and signage that promotes food waste and recyclable collections.
- Require food waste and recycling at farmers markets and other community events.
- Require recycling at special events, such as through special event permit conditions.

Residential

- Include information about recycling opportunities on agency's website.
- Provide information to residents about how to stop receiving unwanted catalogues, phone books and weekly circulars.
- Work with landlords to include recycling requirement information in lease agreements and/or move in packets.
- Adopt a program or ordinance that exceeds state standards by requiring recycling at multi-family housing with four or fewer units.
- Offer a food waste recycling program to residential customers.
- Educate residents about the importance of not contaminating recyclable wastestreams.
- Work with solid waste service providers to adopt enforcement mechanisms for residents and businesses that misuse or contaminate green waste and recycling containers.
- Offer composting and sustainable landscaping classes to the community.
- Implement a vermiculture (worm bin) composting program where residents can "check out" or borrow composting bins and equipment from the agency to start their own composting efforts at home.
- Educate the community about "buy recycled" opportunities.

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For other recycling-related best practices: see Green Building and Climate-Friendly Purchasing areas.

Schools

- Create a partnership with local schools to help encourage waste reduction and recycling.
- Collaborate with schools or nonprofit agencies to help develop and distribute educational materials related to recycling and waste reduction for use in classrooms.
- Encourage schools and other public agencies to use rubberized asphalt pavement for parking lots, where feasible.
- Encourage schools to use tire-derived products for a variety of uses, including sport facilities.

Electronic-Waste and Hazardous Materials

- Create and distribute information about e-waste and hazardous waste disposal.
- Increase opportunities for e-waste and hazardous materials collection and recycling.
- Distribute information and create opportunities for used motor oil recycling.
- Promote proper recycling and disposal options for compact fluorescent light bulbs and batteries.
- Offer disposal options for home-generated "sharps" (needles) and prescription drugs to prevent injuries and contamination of water and wastewater.

Construction Materials and Debris

- Adopt a program or ordinance to reduce, reuse and recycle community construction and demolition waste.
- Adopt a "deconstruction" program or ordinance to salvage and reuse materials in all community remodeling projects.
- Establish a program or ordinance that results in 100 percent recycling of all Portland cement and asphalt concrete.
- Adopt a policy to require use of rubberized asphalt concrete for streets and roads.
- Adopt a policy to use recycled asphalt pavement for streets and roads.
- Adopt a policy to use recycled asphalt pavement for commercial and community parking lots, where feasible.
- Use recycled tire rubber for playground resurfacing and other projects, where appropriate.
- Partner with local businesses to create materials reuse opportunities.

Additional Resources:

- ILG's Commercial Recycling Resource Center: **www.ca-ilg.org/commercialrecycling.**
- Carbon Footprint Calculator for businesses: **www.coolcalifornia.org/business-calculator.**
- Commercial Recycling Climate Calculator: **www.calrecycle.ca.gov/climate/calculator.**

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Climate-Friendly Purchasing

Local agencies are large consumers of goods and services. As such, their purchasing practices can have a significant impact on the environment. By purchasing products or procuring services that reduce greenhouse gas emissions relative to competing goods and services, local agencies can remain fiscally responsible while promoting practices that conserve natural resources.

For other climate-friendly purchasing-related best practices: see Waste Reduction and Recycling and Green Building areas.

Tip: See ILG's Sample Climate-Friendly Purchasing Policy at www.ca-ilg.org/samplepurchasingpolicy and ILG's Greening Agency Fleets Resource Center at www.ca-ilg.org/GreeningAgencyfleets.

Options to Consider

Agency

- Review current purchasing practices to identify possible green procurement opportunities.
- Adopt and implement a procurement policy that establishes standards for purchasing climate-friendly products and services. Examples may include:

  Office and cleaning supplies and equipment that minimize environmental impacts and that do not have a negative effect on human health, such as:

  - Paper products that contain a minimum percentage of post-consumer recycled content.
  - Cleaning products and services recognized with the GreenSeal or EcoLogo.
  - New equipment that meets Energy Star or comparable energy efficiency standards.
  - Computers that meet the highest feasible Electronic Product Environmental Assessment Tool (EPEAT) certification level.
  - Computer and lighting controls that reduce energy and computer idle time.
  - Rechargable batteries, where appropriate.
  - Recyclable or reusable cups, plates and utensils.

  Green Building materials that create a healthier and more sustainable environment, such as:

  - Building and landscaping materials and systems that exceed the CALGreen building code.
  - Carpeting, furnishings or plastic items that contain a minimum percentage of recycled content
  - Paint or carpets that contain low or no volatile organic compounds (VOC).

  Fleets that reduce environmental impact, such as:

  - Fuel efficient, dual fuel or alternative fuel fleet vehicles.
  - Vehicles that have GPS or trip planning devices.
- Conduct employee awareness training on the purchasing and use of green products and services.
- Establish an interdepartmental team to promote policy implementation, track policy adherence and suggest additional items to be included in the policy.
- Report achievements of green procurement program to staff and policy makers annually.
- Consider participating in multi-agency procurement pools that have a climate-friendly purchasing component.
- Consider life cycle pricing to ensure that the maintenance, operating, insurance, disposal and replacement cost of the product or service is considered when evaluating purchase options.

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- Consider efficient transportation methods when purchasing goods and services, such as using local vendors and or locally produced goods to reduce greenhouse gas emissions.
- Consider encouraging the practice of not purchasing new materials, such as office supplies and furniture, through the reuse of existing items in surplus when appropriate and feasible.
- Ensure that minimal packaging materials are used by the agency and that all packaging materials are recycled, non-toxic and/or reusable, where feasible.

Contracting

- Require consultants, contractors and grantees to use recycled products and supplies, when feasible.
- Require service providers to follow climate-friendly practices, or include a preference in selecting and contracting with service providers to those that use climate-friendly practices.
- Require parks maintenance staff or contractors to adopt water or Bay-Friendly practices, if applicable.
- Require agency-issued bids specifications to exceed state law requirements for recycled content.
- When feasible, consider the greenhouse gas emission impacts associated with transportation distances when determining which business or service providers to award contract.
- Provide incentives for the use of fuel-efficient, dual-fuel or alternative fuel vehicles for agency contracts for services involving vehicles, such as buses, waste hauling and recycling, and construction.
- When issuing proposals for services, request firms to show current green certifications that demonstrate their technical knowledge and commitment to sustainability.

Community

- Educate the public about climate-friendly procurement opportunities through the agency's website, traditional marketing and social media.
- Work with the business community to educate them about climate- friendly procurement opportunities through social media and traditional marketing.
- Educate the public about climate-friendly procurement actions being implemented by a local agency.

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Efficient Transportation

Options to Consider

Agency

Transportation is the largest generator of greenhouse gas emissions in California. Efficient transportation systems, encouraging alternatives to single occupancy vehicles, and reducing the miles that vehicles travel can reduce greenhouse gas emissions, help conserve fuel and cut fuel costs, improve air quality, reduce traffic congestion and make streets safer for pedestrians, bicyclists, transit users and motorists.

Note: Metropolitan Planning Organizations and Regional Transportation Planning Agencies can provide guidance on inter-agency collaboration and technical support for the adaptation and use of transportation models.

For other efficient transportation-related best practices: see Land Use and Community Design area.

Planning

- Assess the long-term mobility (the ability for people to get around) needs of the community, including the efficient movement of people and goods.
- Update transportation models to reflect all types (or modes) of transportation, such as walking, bicycling, private vehicles, commercial vehicles, buses, trains and other forms of transit.
- Include transportation mitigation measures for new development which enhance all modes of travel rather than only focusing on automobile delay or speeds.
- Develop short and long-range community transportation goals, objectives and policy statements and include all appropriate goals, objectives and policies in the circulation element of the agency's general plan.
- Develop and include a realistic long-range transportation and land use scenario (or diagram) for local and regional growth in the circulation element of the agency's general plan and other local land use plans (such as specific plans and project development plans), consistent with a regional Sustainable Communities Strategy, if appropriate.
- Collaborate with other agencies (such as cities, counties and metropolitan planning organizations) to share transportation-related information, coordinate planning goals and processes, and take advantage of opportunities to combine and leverage resources.
- Make reducing vehicle-miles traveled (VMT) a high-priority criteria in evaluation of policy, program, and project proposals and alternatives.
- Adopt a policy requiring limitations on idling for commercial vehicles, construction vehicles, buses and other similar vehicles, beyond the requirements of state law, where feasible.
- Implement programs to reduce "incident-based" traffic congestion, such as expedited clearing of accidents from major traffic arteries, airport traffic mitigation, etc.
- Develop a financial plan that covers life-cycle costs related to the development, maintenance and operation of current and future transportation facilities and services (such as transit service).
- Identify funding sources for implementing transportation plans.
- Implement transportation planning strategies that consider demand management solutions for transit, bicycle and walking growth equally with strategies to increase automobile capacity.

Infrastructure

- Implement Intelligent Transportation Systems (ITS) for surveillance and traffic control, such as synchronized signals, transit and emergency signal priority, and other traffic flow management techniques as appropriate, to improve traffic flow and reduce vehicle idling.

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- Install signal priority technology in agency transit systems (such as buses) to reduce number of stops and idling.
- Ensure that traffic lights have sensors to detect bicycles.
- Install roundabouts in lieu of signalized intersections as a way to improve traffic flow, reduce accidents and reduce greenhouse gases.
- Improve intersection safety through pedestrian countdown signals and high visibility crosswalks.
- Identify opportunities for infrastructure improvements such as High Occupancy Vehicle (HOV), High Occupancy Toll (HOT) lanes and dedicated bus rapid transit right-of-ways and coordinate with regional and state agencies when appropriate.
- Encourage and/or construct infrastructure for electric vehicle charging and natural gas vehicle fueling for agency vehicles and the community.
- Develop a non-motorized connectivity plan (complete streets) to create a path and roadway network and make sure that bicycle paths and pedestrian walkways connect to neighborhood destinations, schools, parks, light rail stations and essential services.
- Include bicycle, pedestrian and transit facilities in public works projects, where appropriate, as a component of a local complete streets program.
- Prepare a bicycle master plan to guide bikeway policies and development standards to make bicycling safer, more convenient and enjoyable for all bicyclists.
- Prepare a pedestrian master plan to guide walkway policies and development standards to make walking safer, more convenient and enjoyable for all pedestrians.
- Increase the number of bicycle lanes, lockers, racks, paths and signage throughout the community.
- Reduce parking requirements for projects that link or emphasize alternative types of travel.
- Use microwave technology, video detection and street embedded sensors to protect cyclists from buses, cars and motorcycles.
- Use alternative or recycled materials for road paving (such as cold central plant recycling or cold in-place recycling) to reduce energy and greenhouse gas emissions from transport and material production/processing.

For more options: see Renewable and Low-Carbon Fuels area.

Agency Fleet

- Adopt a policy that sets fleet efficiency standards for new agency vehicles.
- Purchase or lease fuel efficient or alternative fuel vehicles, including zero or near-zero emission vehicles, to save fuel and money and reduce greenhouse gas emissions.
- Install low-draw emergency lighting in agency vehicles, allowing lights to be used without the engine running.
- Consider purchasing bicycles for local travel by agency employees.
- Install battery systems for vehicles with onboard equipment (such as boom tucks) to decrease truck idling while equipment is used.

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For additional resources related to Fuel Efficient and Alternative Fuel Vehicles: see ILG's Greening Agency Fleets Resource Center at www.ca-ilg.org/greeningagency-fleets.

- Provide fuel saving tips to drivers of fleet vehicles.
- Use Global Positioning Systems (GPS) and integrated software to control fleet vehicles, reduce misuse and increase efficiency through trip planning and location information.
- Replace buses with smaller, more fuel efficient, buses for light-traveled transit routes.
- Evaluate natural gas fueling infrastructure and sharing of facilities with other public agencies to help pay for installation and ongoing costs.
- Establish a crew-based maintenance plan (such as with parks employees) instead of individual assignments, to create a "carpool effect" that lowers the annual miles traveled for maintenance staff.
- Utilize technology options (such as digital service requests accessible by mobile devices) for field personnel to avoid extra trips back to the office.

Agency Employee Programs

- Offer agency employees with incentives to use alternatives to single-occupant auto commuting, such as parking cash-out, flexible schedules, transit incentives, bicycle facilities, bicycle sharing programs, ridesharing services and subsidies, locker/shower facilities and telecommuting.
- Develop a real-time ridesharing program that utilizes smart phone technology.
- Incorporate a guaranteed ride home program as part of agency commuter trip reduction incentive programs.
- Provide parking spaces dedicated to employees who use alternative transportation (such as walking, bicycling, bus, etc.) for the rare occasions they need to drive to work.
- Implement a flexible work schedule for agency employees, incorporating telecommuting and modified schedules.
- Establish a "bike barn" to enable agency employees to borrow a bicycle to use for local meetings.
- Construct bicycle stations for employees that include bicycle storage, showers and bicycle repair space.
- Offer employees incentives to purchase fuel efficient or alternative fuel vehicles.

Community

- Increase online permitting services to reduce the need to travel to agency offices for minor permits.
- Consolidate offices that community members often visit at the same time (such as building permitting and environmental health permitting) to reduce vehicle miles traveled.
- Encourage and facilitate the development of car-sharing, Dial-a-Ride (or a similar flexible-route transit service), bicycle sharing programs and other services that reduce the need to use a personal motor vehicle.
- Implement variable demand pricing for on- and off-street parking facilities in order to discourage single-occupant-vehicle and peak travel, increase parking supply, business access and parking turnover.

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- Work with major employers in the community to offer incentives and services to increase the use of alternatives to single-occupant auto commuting (also called voluntary commute trip reduction programs).
- Develop and implement voluntary agreements to encourage commuter trip reduction programs for new commercial developments.
- Offer car and bicycle-sharing programs in the community.
- Encourage or require parking preferences for those who rideshare or use alternative fuel vehicles in public and private parking lots, garages, and on-street spaces.
- Adjust bus schedules to maximize ridership opportunities for residents.
- Provide real-time bus arrival and departure information to riders at transit stops and through the web-based services and text messaging.
- Dedicate revenues from fees and tolls to promote alternative transportation modes, to the extent permitted by law.
- Consider the public health co-benefits in promoting use of transit and other alternatives to single-occupant vehicle travel.
- Offer presentations to community groups highlighting the economic, health and environmental benefits of bicycling and walking.
- Partner with health organizations to offer incentive programs to encourage bicycling and walking.
- Partner with schools and other agencies to identify and implement safer travel opportunities for bicycles and walking between home and school (such as through Safe Routes to School Programs).
- Create and distribute bike maps and "safe routes to school" maps to community members through collaborating with local businesses, service organizations and schools.
- Include information on agency website about state and federal clean vehicle rebates.

Note - Additional resources available from ILG:

- SB 375 Resource Center: **www.ca-ilg.org/sb-375-resource-center**.
- Greening Agency Fleets Resource Center: **www.ca-ilg.org/greeningagencyfleets**.
- Safe Routes to Schools Toolkit: **www.ca-ilg.org/srts-toolkit**.

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Land Use and Community Design

Options to Consider

Agency

Well-planned communities with a balance of housing, jobs, shopping, schools and recreation can reduce the length and frequency of trips and give people the option of walking, biking, or using transit rather than driving. This results in lower greenhouse gas emissions and also promotes physical activity and more vibrant, healthy and sustainable communities.

For other land use and community design-related best practices: see Green Building, Renewable Energy and Efficient Transportation areas.

Encourage Compact, Efficient and Contiguous Development

- Develop general plan policies that integrate diverse land uses – including housing, employment and community services – at appropriate densities to help reduce automobile travel and promote walking, bicycling and other opportunities for physical activities.
- Work with school districts to develop school siting policies that encourage infill locations to take advantage of existing complementary uses, existing housing, and walking and bicycling opportunities, and avoid greenfield locations outside established urban areas.
- As part of general plan housing element updates, inventory potential infill development sites, and maintain a community-wide database of vacant and underutilized infill sites to monitor the community's growth and change.
- Plan, zone and provide incentives for new development and renovation of existing uses in identified infill areas.
- Streamline the entitlement process for development of high quality residential construction in older and infill areas through updates to the housing element of the general plan or the zoning code, including taking full advantage of opportunities to streamline the California Environmental Quality Act (CEQA) review for infill development.
- Implement methods (such as urban service boundaries and priority infrastructure investment areas) to limit non-contiguous development patterns and foster more compact urban form.
- Consider increasing development density in areas that are well-served by transit, including incentives and streamlining for transit-oriented development.
- Develop policies and incentives (such as minimum conservation requirements, development boundaries, density limitations and support for the Williamson Act) to promote the preservation of farmland, open space and sensitive lands.
- Establish a policy that increases the available open space (such as parks, green belts, hiking trails, etc.) to support different types of uses and the different recreational needs of the community.

Support Alternative Energy and Waste Processing Land Use Options

- Identify appropriate sites for potential solar or wind generation facilities.
- Identify appropriate sites and zoning designations for recycling processing facilities and manufacturing that uses recycled materials.
- Adopt policy or program that mandates or offers incentives (such as Property Assessed Clean Energy (PACE) financing, streamlined permitting or fee waivers) for installation of photovoltaic and/or solar hot water systems on new or existing residential and commercial buildings and energy efficiency retrofits on existing buildings.

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Land Use Policies Supporting Green Building

- As a way to provide more predictability to the development community, include in the general plan and the zoning code policies and regulations that support and encourage green building practices and development patterns that promote sustainable communities through subjects, such as green building ordinances, solar orientation of structures and subdivisions, bicycle and pedestrian access, in-fill development and alternative energy use.
- Require new housing and mixed use developments to be built to the LEED® for Neighborhood Development (LEED-ND) standard, Build It Green or equivalent standards.
- Require bicycle racks, showers and/or other amenities as part of new commercial development projects to promote bicycle use by new employees/ residents.
- Provide expedited application processing for development projects that meet or exceed sustainable land use policies.

Planning for a Variety of Transportation Choices

Tip: Consider a public health approach to planning and development that encourages alternatives to single-occupant-vehicle travel and promotes active transportation in order to provide health benefits such as new exercise opportunities (walking and bicycling), pedestrian and bicyclist safety and improved air quality that reduces asthma and other health conditions and diseases.

Bicycle and Pedestrian Opportunities

- Assess and report to local governing body and the public on pedestrian and bicycle conditions in existing communities and neighborhoods.
- Develop and adopt a community-wide pedestrian and bicycle plan and capital investment program that maximizes the potential for residents to walk or bicycle within and between neighborhoods.
- Provide bicycle access to transit services on major transit corridors and other routes that may attract bicyclists, such as routes serving schools and colleges.
- Incorporate new overpasses and underpasses with bike lanes and pedestrian sidewalks to improve air quality by reducing GHG emissions from vehicle idling while waiting for pedestrians and bicycles crossing.
- Increase opportunities for walking and bicycling by requiring direct pedestrian and bike paths even when roadways do not connect through new and existing developments.
- Implement zoning for mixed-use development to encourage walking or biking for short trips rather than using vehicles.
- Require sidewalks in all new developments and incorporate new trees and tree wells in sidewalk areas.

Transit Opportunities

- Update the general plan to address multi-modal transit, mass transit, infill development, density and mixed-use and reducing greenhouse gas emissions.
- Provide incentives and remove potential barriers to the development of mixed-use and higher intensity development projects at transit nodes and along transit corridors (existing and planned).
- Require new development at transit nodes and along transit corridors to meet planning and design standards to generate, attract and facilitate transit ridership as a condition of approval; for instance, make the project more attractive to the target population (such as young, single urban individuals).

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Parking Opportunities

- Reduce parking requirements, to the extent feasible, to facilitate higher density development that fosters access to walking, biking and public transit.
- Integrate park-and-ride lots and car sharing service spaces with mixed-use facilities and transportation hubs/centers.
- Promote revitalization of transit corridors by improving light rail, bus rapid transit (BRT) or other high-service transit facilities and services, and promoting an appropriate mix of housing, retail, and office space.
- Require new commercial developments to include electric vehicle charging and natural gas fueling stations in parking lots or garages.

Streets and Roads Opportunities

- Plan and encourage roadways of smaller residential-scaled streets (generally 2 or 4 lanes maximum) with high levels of connectivity and short blocks.
- Implement design standards that require streets and sidewalks to be designed for multi-modal mobility and access, including walking and bicycling, to ensure that new development is designed, sited and oriented to facilitate pedestrian, bicycle and other mobility and access (also referred to as complete streets).
- Create residential neighborhood traffic management (traffic calming) plans to improve livability by reducing speeding and traffic volumes and increase safety for walking and bicycling.
- Cluster freight facilities near ports, airports, and rail terminals to reduce their impact on streets and roadways.

Evaluate Greenhouse Gas Emissions and Plan for Mitigating and Adapting to Climate Change

- Adopt a climate action plan or include a greenhouse gas reduction, climate adaptation or climate mitigation plan or policies in the general plan, or include within the general plan a requirement for development and adoption of such plans.
- Ensure that the adopted climate action plan complies with the California Environmental Quality Act (CEQA) Guidelines to help streamline the CEQA review for future development projects that are consistent with the climate action plan.
- Include within a climate action plan or general plan a procedure to monitor and track greenhouse gas emissions associated with development projects and municipal operations.
- Review zoning codes and development policies to identify changes that could improve implementation of land use and transportation policies that reduce greenhouse gas emissions.
- Develop and adopt a preferred land use and transportation scenario for future development to reduce vehicle miles traveled (VMT) in alignment with the region's sustainability strategy, including through computer modeling tools.
- Work with other jurisdictions within the region to identify and address existing and potential regional sources of greenhouse gas emissions under different development scenarios.

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- Amend local CEQA guidelines to explain how to treat analysis of greenhouse gas emissions, such as including thresholds of significance.
- Adopt policies in the general plan, climate action plan or other appropriate policy document to address the potential land use and community design effects of climate change (such as sea level rise, heat events, wildfires) especially for providing essential public services (such as police, fire, etc.).

Improve Communication, Collaboration and Inclusion

- Coordinate planning and project approval procedures to increase collaboration between planning and other agency staff (such as public works, utilities, public safety, etc.), as appropriate.
- Involve a diverse group of stakeholders in planning processes to ensure the agency's guiding plans are representative of community's diverse population and interests.
- Use non-conventional methods to gather input from diverse community groups, particularly those that do not ordinarily participate in community planning efforts (for example conduct outreach and education through community groups and non-profits prior to public hearings).
- Collaborate with local, regional and state agencies to share land use and community design-related information, coordinate planning goals and processes, and take advantage of opportunities to combine and leverage scarce resources.
- Analyze impacts of development projects on safety and involve emergency responders and public safety staff early and consistently in development of growth plans.
- Develop and implement an approach to planning that identifies and balances economic, environmental and social equity needs.
- Participate in regional planning efforts, such as processes to develop and implement the regional Sustainable Communities Strategy pursuant to SB 375 and, where appropriate, align local general plans and zoning for consistency with the regional transportation plan.



Open Space and Offsetting Carbon Emissions

Options to Consider

Agency

Forests, parks, agricultural lands and open space serve as "carbon sinks" by storing greenhouse gas emissions that otherwise contribute to climate change. Co-benefits of preserving open space and protecting local agriculture may include: making recreational activities available to community residents and, in some cases, reducing vehicle miles traveled.

Note: Greenhouse gas emissions (also called carbon emissions) generally include carbon dioxide, methane, nitrous oxide, hydro-fluorocarbons, perfluorocarbons and sulfur hexafluoride. Greenhouse gas emissions are expressed as "carbon dioxide equivalents" which are numbers that translate emissions from different types of greenhouse gases, based upon their climate warming potential, into the equivalent amount of emissions from carbon dioxide.

Plans and Policies

- Include specific goals and policies designed to reduce carbon emissions in the open space element of the agency's general plan.
- Adopt a tree ordinance to protect urban forests, including protection for specific individual trees or tree species important to the community.
- Adopt a ridgeline and hills ordinance to restrict grading and home building on hillsides as a way to enhance public safety and preserve open space.
- Adopt a climate action plan that includes strategies to reduce carbon emissions through open space.
- Adopt a policy to thin agency trees and remove brush on agency land, as feasible and appropriate, to reduce the threat of fire and release of carbon emissions from forest and range fires.
- Adopt a policy to support waste-to-energy projects that use forest waste, food waste or other vegetative sources of methane and other greenhouse gases that would otherwise release greenhouse gases into the atmosphere.
- Apply for designation as a Tree City USA community by the Arbor Day Foundation.

Parks

- Increase the number, type and accessibility of parks and other recreational opportunities in the community, including promoting associated public health benefits.
- Increase opportunities for recreational open space.
- Build environmentally sustainable parks by incorporating reused and recycled materials, water-efficient landscaping and water-efficient technology systems.
- Evaluate opportunities to convert closed solid waste landfills to parks or open space.

Habitat & Open Space

- Protect natural lands through:
  - Partnerships with other agencies, stakeholders and non-profit organizations
  - Land acquisition
  - Conservation easements
  - Other long-term mechanisms
- Evaluate habitat monitoring, management and restoration protocols to consider possible future impacts of changing climatic conditions.
- Work with property owners, state and federal wildlife agencies to create a new or expanded multi-species habitat conservation plan.

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- Develop and implement a community-wide urban forestry management and reforestation program to increase the carbon storage potential of trees and other vegetation in the community.
- Manage parks, open space, recreational facilities and other natural areas owned or operated by the agency to ensure the long-term health and viability of trees and other vegetation.
- Remove invasive non-native plants in order to reduce risk of forest and grassland fires (and the associated greenhouse gas release) and promote sustainable native forests and grasslands.
- Inventory existing trees on property owned or managed by the agency, including street trees, and implement a management system to preserve and enhance the tree system.
- Plant native trees and drought tolerant vegetation throughout the community.

Agriculture and Food Purchases

- Enact a policy to purchase locally grown food for agency food purchases, when feasible, to promote retention of local agricultural land uses.
- Where feasible, direct new development away from open space and agricultural lands in order to take advantage of carbon storage opportunities.

Offsetting Carbon (Greenhouse Gas) Emissions

- Achieve carbon neutrality at agency-sponsored events and activities through conservation, efficiency, recycling, alternative transportation and other strategies that reduce greenhouse gas emissions.
- Purchase and retire (put out of use) third-party verified greenhouse gas emission reduction credits.
- Create incentives for community organizations, businesses and residents to reduce their carbon emissions, including the purchase of third-party verified greenhouse gas emission reductions.

Community

Tree Planting

- Provide tree planting resources and information on the agency website to encourage tree planting by residents.
- Participate in regional tree planting efforts to mobilize and encourage the community to plant trees.
- Create an agency-sponsored tree planting program that offers free shade and other trees to residents, businesses, schools and non-profits, as well as education about the care and benefits from trees. Collaborate with the local utility if it has a tree planting program to help get the word out.

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Agriculture and Food Purchases

- Assist efforts by community groups and non-profit organizations to create community gardens.
- Encourage community gardens and farmers markets to support the availability of healthy, locally grown produce.
- Provide financial incentives for low-income residents to purchase fresh produce at farmers markets in the community.
- Promote the purchase of locally-grown produce through farmers markets and other measures.
- Promote conservation tillage and other agricultural practices to retain carbon fixed in soils.
- Host workshops to showcase community supported agriculture, farm-to-school programs and local organic farms.

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Community and Individual Action

Options to Consider

Providing reliable and objective information helps inform residents about the causes, impacts and possible responses to climate change. Involving the community in the development of proposed sustainability policies and programs builds buy-in and awareness. Providing practical information that helps individuals reduce their greenhouse gas emissions empowers them to take action and make a difference.

Inform

- Develop and implement a community climate change education program that provides community members with basic information about climate change.
- Host informational workshops to educate residents and businesses about sustainability opportunities, such as those from energy efficiency and water conservation.
- Develop information and positive messages about activities individuals and businesses can take to reduce greenhouse gas emissions.
- Inform the public about the environmental, community and financial benefits of actions that reduce greenhouse gas emissions.
- Create a sustainability handbook, available online and in hard copy, that outlines the steps residents and businesses can take to go green, such as by reducing energy and water use, recycling and using alternative transportation.
- Issue a sustainability edition of the agency newsletter.
- Include information in local agency mailings, websites and other media about actions that individuals and businesses can take to address climate change.
- Share progress with community members on the implementation of agency and/or community climate action plans and sustainability policies.
- Use the agency's social media channels, such as Facebook, Twitter, Nixle and Notify Me, to inform the community about sustainable activities in the community.
- Work with ethnic media to engage non-English speaking groups in the development of sustainability programs and policies.
- Develop public service announcements and/or talk shows related to sustainability.
- Distribute give-away items, such as reusable bags and compact fluorescent lightbulbs, to encourage environmental responsibility.
- Distribute maps showing the community bicycle and walking trail systems to encourage reduction of vehicle miles traveled.

Consult

- Survey businesses and residents to understand attitudes and behaviors related to sustainability, energy efficiency and climate change; use this information to develop and implement community wide sustainability action items.
- Create ongoing opportunities for community members to provide feedback on proposed sustainability policies and programs, such as through surveys, online or public forums and at stakeholder meetings.

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Involve

- Create a community sustainability commission to help with the development, implementation and tracking of a climate action or sustainability plan.
- Host a green leadership summit for community leaders, school groups and private entities to gather and share experiences, expertise, strategies and ideas for the development of a healthier and more sustainable community.
- Involve diverse stakeholders, including such groups as ethnic chambers of commerce and neighborhood groups, in developing sustainability policies and programs.
- Include sustainability and climate change-related projects as part of youth commission activities.
- Provide programs and/or incentives to individuals, groups and businesses that adopt practices that reduce their carbon footprint. Incentives can be financial or non-financial, such as official recognition of participants' efforts.
- Challenge community members to go on a "carbon diet" to promote individual action to reduce greenhouse gas emissions.

Collaborate

- Invite community members, organizations and other local agencies to participate in ongoing conversations regarding future growth plans and policies.
- Collaborate with local utilities to create and publicize energy efficiency opportunities for residents and businesses, such as through an energy showcase home or model sustainable landscape projects that reduce water and energy.
- Collaborate with schools to educate students about opportunities to be more energy efficient and to reduce, re-use and recycle.
- Develop a sustainability or community climate change outreach and education program that enlists participation from schools, museums, service groups and business organizations, such as local chambers of commerce, neighborhood and homeowner associations and other community partners.
- Partner with the local community college and grade schools to develop classes or workshops with an environmental focus.
- Collaborate with high schools and community colleges to provide students with internship opportunities related to sustainability.
- Collaborate with other local government agencies to share information about climate change and best practices to reduce greenhouse gases.
- Partner with other organizations to implement a bulk purchase discount program for such items as energy efficiency equipment and photovoltaic solar systems.
- Create an inter-agency local or regional climate action partnership and/or action plan with one or more agencies or neighboring jurisdictions.
- Initiate a community climate action partnership with a global sister agency.

Continued on next page





Empower

- Participate in the CoolCalifornia Challenge which challenges local agencies to engage residents in taking action to reduce household energy and vehicle miles traveled.
- Sponsor a program to assist local business in adopting sustainable practices.
- Host one or more events to highlight and promote sustainability programs, such as an e-waste drop off, plant a tree, bike to work day or buy local campaigns.

EXHIBIT L

JUNE 2013

OUTLOOK

Newsletter and Activity Guide

lancaster ca
it's positively clear



SUMMER CLASS SCHEDULE INSIDE!

Spreading Sunshine All Over the Place

City moves forward with new solar initiative

The City of Lancaster has become the first city in America to require all new residential construction projects to include solar power beginning in 2014.

Part of Lancaster's ongoing commitment to produce more clean energy than it consumes, the new rules were adopted on a 5-0 vote by the City Council, after previously being recommended unanimously by the City's Planning Commission.

The new regulations do not require solar panels to be installed on every home within a new subdivision, but do call for a minimum average solar generating capability of .5 to 1.5 kW per unit depending on lot size and location. New multi-family developments are also covered by the ordinance.

"We've taken a forward looking approach to this new ordinance. It is much more about the future than the past," said James Vose, Planning Commission Chairman. "This plan will help reduce our residents' energy costs while lessening the impact of fossil fuel on our environment."

In developing the new "Residential Zone Update," the Planning Commission and City staff tried to balance the needs of builders with the desires of the City to reduce its environmental impact and improve overall quality of life.

"City planning staff and commissioners did a great job in collaborating with the residential building industry, as well as real estate and building trade associations to obtain the necessary input and feedback on the ordinance," added Vose. "We spent a year discussing this in public meetings, workshops and field trips before recommending these regulations to the City Council."

In addition to the solar requirements, the new ordinance provides builders with greater flexibility in their site designs, to help improve the walkability of neighborhoods. The new regulations also call for increased use of porches and recessed garages in new developments, thus encouraging more front yard activity. It has been shown that such architectural features help create a more cohesive neighborhood while discouraging crime by putting more "eyes on the street."



The new zoning rules also provide incentives for infilling existing vacant parcels within the City rather than consuming raw land along the edges of the City. The rules also make it easier to accommodate "granny flats" and similar accessory dwellings in new developments, for use by family members. They also ease regulations on live/work situations in homes along major thoroughfares.

For more information on the new Residential Zone Update, visit the City's website at www.cityoflancasterca.org/residentialzoneupdate.

"We've taken a forward looking approach to this new ordinance. It is much more about the future than the past. This plan will help reduce our residents' energy costs while lessening the impact of fossil fuel on our environment."

– James Vose
Planning Commission Chairman



EXHIBIT M

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

EVERY DEPARTMENT

10. EVERY. 1 SP - Hold Harmless RECOMMND

The applicant/permittee or any successor-in-interest shall defend, indemnify, and hold harmless the County of Riverside or its agents, officers, and employees (COUNTY) from the following:

(a) any claim, action, or proceeding against the COUNTY to attack, set aside, void, or annul an approval of the COUNTY, its advisory agencies, appeal boards, or legislative body concerning the SPECIFIC PLAN and,

(b) any claim, action or proceeding against the COUNTY to attack, set aside, void or annul any other decision made by the COUNTY concerning the SPECIFIC PLAN including, but not limited to, decisions made in response to California Public Records Act requests.

The COUNTY shall promptly notify the applicant/permittee of any such claim, action, or proceeding and shall cooperate fully in the defense. If the COUNTY fails to promptly notify the applicant/permittee of any such claim, action, or proceeding or fails to cooperate fully in the defense, the applicant/permittee shall not, thereafter, be responsible to defend, indemnify or hold harmless the COUNTY.

The obligations imposed by this condition include, but are not limited to, the following: the applicant/permittee shall pay all legal services expenses the COUNTY incurs in connection with any such claim, action or proceeding, whether it incurs such expenses directly, whether it is ordered by a court to pay such expenses, or whether it incurs such expenses by providing legal services through its Office of County Counsel.

10. EVERY. 2 SP - Definitions RECOMMND

The words identified in the following list that appear in all capitals in the attached conditions of Specific Plan No.375 shall be henceforth defined as follows:

SPECIFIC PLAN = Specific Plan No. 375

CHANGE OF ZONE = Change of Zone No. 7623.

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10. EVERY. 2 SP - Definitions (cont.) RECOMMND

GPA = Comprehensive General Plan Amendment No. 910.

EIR = Environmental Impact Report No. 514.

DISTRICT or DISTRICTS = A SPECIFIC PLAN'S Planning Cluster of Planning Areas as specified in the SPECIFIC PLAN, a large planning area. The intent of the DISTRICT is to break down a very large Specific Plan into manageable sections or pieces. Each DISTRICT should be about the size of a traditional Specific Plan.

DISTRICT REFINEMENT PLAN or DRP = a substantial conformance to the SPECIFIC PLAN intended to become a Design Guideline Document, submitted separately for each DISTRICT within the SPECIFIC PLAN. The DISTRICT REFINEMENT PLAN may address features that are specific to an individual DISTRICT and may not affect the entire SPECIFIC PLAN.

TOTAL DWELLING UNIT TRACKING MATRIX = A chart for purposes of tracking the total build out of the SPECIFIC PLAN maintained by TLMA Counter Services Divison. The matrix shall differentiate between individual building permits and the total number of dwelling units that are represented by the building permits that have been issued for the entire Specific Plan.

BUILDING PERMITS = the number of dwelling units constructed within an implementing project. Any condition of approval that uses the term "building permit" to trigger an event or to cause another action to take place shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

CLIMATE ACTION PLAN or CAP = a section of the SPECIFIC PLAN that outlines standards, suggestions, and guidance intended to reduce Greenhouse Gases.

10. EVERY. 3 SP - SP Document RECOMMND

Specific Plan No. 375 shall include the following:

a. Specific Plan Document, which shall include:

1. Board of Supervisors Specific Plan Resolution including the Mitigation Reporting/Monitoring Program

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10. EVERY. 3 SP - SP Document (cont.) RECOMMND

2. Conditions of Approval.
3. Specific Plan Zoning Ordinance.
4. Land Use Plan in both 8 1/2" x 11" black-and-white and 11" x 17" color formats.
5. Specific Plan text.
6. Descriptions of each DISTRICT in both graphical and narrative formats.

b. Final Environmental Impact Report No. 514 Document, which must include, but not be limited to, the following items:

1. Mitigation Monitoring/Reporting Program.
2. Draft EIR
3. Comments received on the Draft EIR either verbatim or in summary.
4. A list of person, organizations and public agencies commenting on the Draft EIR.
5. Responses of the County to significant environmental points raised in the review and consultation process.
6. Technical Appendices on CD.

If any specific plan conditions of approval differ from the specific plan text or exhibits, the specific plan conditions of approval shall take precedence.

10. EVERY. 4 SP - Ordinance Requirements RECOMMND

The development of the property shall be in accordance with the mandatory requirements of all Riverside County ordinances including Ordinance Nos. 348 and 460 and state laws; and shall conform substantially with the adopted SPECIFIC PLAN as filed in the office of the Riverside County Planning Department, unless otherwise amended.

10. EVERY. 5 SP - Limits of SP DOCUMENT RECOMMND

No portion of the SPECIFIC PLAN which purports or proposes to change, waive or modify any ordinance or other legal requirement for the development shall be considered to be part of the adopted specific plan. Notwithstanding to above, the design guidelines and development standards of the SPECIFIC PLAN shall apply in place of more general County guidelines and standards.

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

BS GRADE DEPARTMENT

10.BS GRADE. 1 SP-GSP-1 ORD. NOT SUPERSEDED RECOMMND

Anything to the contrary, proposed by this Specific Plan, shall not supersede the following: All grading shall conform to the California Building code, County General Plan, Ordinance 457 and all other relevant laws, rules and regulations governing grading in Riverside County.

10.BS GRADE. 2 SP-GSP-2 GEO/SOIL TO BE OBEYED RECOMMND

All grading shall be performed in accordance with the recommendations of the included -County approved- geotechnical/soils reports for this Specific Plan.

10.BS GRADE. 3 SP-ALL CLEARNC'S REQ'D B-4 PMT RECOMMND

Prior to issuance of a grading permit, all certifications affecting grading shall have written clearances. This includes, but is not limited to, additional environmental assessments, erosion control plans, geotechnical/soils reports, and departmental clearances.

10.BS GRADE. 4 SP-NO GRADING & SUBDIVIDING RECOMMND

If grading of the entire - or any portion there of - Specific Plan site is proposed, UNDER A SUBDIVISION OR LAND USE CASE ALREADY APPROVED FOR THIS SPECIFIC PLAN, at the same time that application for further subdivision of any of its parcels is being applied for, an exception to Ordinance 460, Section 4.5.B, shall be obtained from the Planning Director, prior to issuance of the grading permit (Ord. 460 Section 3.1). THIS EXCEPTION WILL NOT APPLY TO ANY CASE HAVING ONLY AN APPROVED SPECIFIC PLAN.

FIRE DEPARTMENT

10.FIRE. 1 SP-#47 SECONDARY ACCESS RECOMMND

In the interest of Public Safety, the project shall provide an Alternate or Secondary Access(s) as stated in the Transportation Department Conditions. Said Alternate or Secondary Access(s) shall have concurrence and approval of both the Transportation and Fire Departments and shall be maintained through out any phasing.

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.FIRE. 2 SP-#86-WATER MAINS RECOMMND

All water mains and fire hydrants providing required fire flows shall be constructed in accordance with the appropriate sections of Riverside County Ordinance 460 and/or No.787, subject to the approval by the Riverside County Fire Department.

10.FIRE. 3 SP-#101-DISCL/FLAG LOT RECOMMND

1) FLAG LOTS WILL NOT BE PERMITTED BY THE FIRE DEPARTMENT.

) This project lies within the VERY HIGH FIRE HAZARD SEVERITY ZONE.

3) A fire fuel analysis of the open space/wildlands within and outside the project area may be required prior to submitting a fuel modification plan.

NOTICE:
The transferor of real property shall disclose to the transferee that this project lies within a VERY HIGH FIRE HAZARD area.

10.FIRE. 4 SP-#71-ADVERSE IMPACTS RECOMMND

The proposed project will have a cumulative adverse impact on the Fire Department's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures and population. The project proponents/develpers shall participate in the development Impact fee program as adopted by the Riverside County Board of Supervisors to mitigate a portion of these impacts. This will provide funding for capitol improvements such as land/equipment purchases and fire station construction. The Fire Department reserves the right to negotiate developer agreements associated with the development of land and/or construction of fire facilities to meet service demands through the regional integrated fire protection response system.

10.FIRE. 5 SP-#100-FIRE STATION RECOMMND

Based on the adopted Riverside County Fire Protection Master Plan, one new fire station and/or engine company could be required for every 2,000 new dwelling units,and/ or 3.5 million square feet of commercial/industrial

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.FIRE. 5 SP-#100-FIRE STATION (cont.) RECOMMND

occupancy. Given the project's proposed development plan, up to 6 fire station(s) MAY be needed to meet anticipated service demands. The Fire Department reserves the right to negotiate developer agreements associated with the development of land and/or construction of fire facilities to meet service demands through the rgional intergrated fire protection response system.

PLANNING DEPARTMENT

10.PLANNING. 17 SP - PDP01341 RECOMMND

County Paleontological Report (PDP) No. 1341, submitted for this case (SP00375), was prepared by Paleo Environmental Associates, Inc. and is entitled: "Paleontological Resources Inventory and Impact Assessment Technical Report prepared in support of Travertine Point Specific Plan, Vicinity of Salton Sea, Riverside County, California", dated December 2008.

PDP01341 concluded:

1.The project plan area is underlain by paleontologically highly sensitive strata.

2.Earthmoving activities associated with development of the plan area would have a high potential for encountering fossil remains.

3.Paleontological resources might be adversely affected by the earth-moving activities associated with the development of the Travertine Point Specific Plan.

4.Paleontological resources impact mitigation is warranted.

PDP01341 recommended:

1.Paleontological construction monitoring and fossil/sample recovery.

2.Paleontological Resource Impact Mitigation Program design criteria are discussed in this report.

3.The level and type of mitigation effort in a particular part of the plan area reflects the paleontologic or

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.PLANNING. 17 SP - PDP01341 (cont.) RECOMMND

scientific importance and the corresponding impact sensitivity.

PDP01341 satisfies the requirement for a Paleontological Study for Planning/CEQA purposes. PDP01341 is hereby accepted for SP00375. A project specific Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared and submitted to the County Geologist for review and approval prior to issuance of any grading permit for each implementing project under this Specific Plan.

10.PLANNING. 18 SP - GEO02091 RECOMMND

County Geologic Report (GEO) No. 2091, submitted for this project (SP00375) was prepared by Sladden Engineering and is entitled: "Geotechnical Investigation, Proposed Master Planned Community, Rivera-Travertine Properties, South of 81st Avenue Along Highway 86, Oasis Area of Riverside County, California, Project No. 544-06699", dated November 30, 2006. In addition, Sladden prepared the following documents:

"Response to County of Riverside Review comments dated October 30, 2008: County Geologic Report No. 2091", dated May 24, 2009.

"Response to County of Riverside Review comments dated November 12, 2009: County Geologic Report No. 2091; Review Comments #2", dated December 16, 2009

These documents are herein incorporated as a part of GEO02091.

GEO02091 concluded:

1.The subject site is located in an area of seismic activity and will likely experience intense seismic shaking during the design life of the proposed project.

2.No known faults have been mapped trending through the site.

3.Risks associated with surface fault rupture should be considered low.

4.The low calculated factors of safety for some of the

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.PLANNING. 18 SP - GEO02091 (cont.) RECOMMND

granular layers and non-plastic silt deposits suggest that the layers may exhibit liquefaction behavior for the design level earthquake ground shaking considered.

5.The maximum total liquefaction-induced ground settlement at the site could be up to 3 inches during the postulated earthquake. The differential settlement resulting from liquefaction should be less than 1.5 inches.

6.The subject parcels are located on relatively level ground and are not situated immediately adjacent to any mountains or hillsides. As such, the subject parcels are not susceptible to any forms of slope instability.

7.Seiches should be considered a potential hazard to the site.

8.Risks associated with flooding and erosion may need to be considered.

GEO02091 recommended:

1.Remedial grading for building areas to result in the construction of a uniform compacted soil mat beneath all structures.

2.Post-tensioned slabs are recommended to mitigate surficial ground movement related to liquefaction.

3.Mitigation of seiche potential through the use of earthen levees, dykes, or similar water retaining structures.

GEO02091 satisfies the requirement for a Geologic Study for Planning / CEQA purposes. GEO No. 2091 is hereby accepted for Planning purposes for this Specific Plan. This approval is not intended, and should not be misconstrued as approval for any future entitlement project or grading permit. Engineering and other building code parameters will be reviewed and additional comments and/or conditions may be imposed by the Building and Safety Department upon application for grading and/or building permits.

A geologic investigation report will be required for all implementing projects (Tract Map, Plot Plan, etc.) as described elsewhere in this conditions set.

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.PLANNING. 19 SP - MANTN AREAS,PHASES&DIST RECOMMND

All planning area's, phase numbers, and DISTRICT numbers shall be maintained throughout the life of the SPECIFIC PLAN, unless changed through the approval of a specific plan amendment or specific plan substantial conformance accompanied by a revision to the complete SPECIFIC PLAN document.

10.PLANNING. 20 SP - NO P.A. DENSITY TRANSPER RECOMMND

Density transfers between Planning Areas within the SPECIFIC PLAN shall not be permitted, except through the Specific Plan Amendment process.

In this SPECIFIC PLAN, each Planning Area (PA) has a "Target" unit count. Each PA also has a Land Use Designation Range. The Target unit count is an estimate used to create a total dwelling unit number for the entire SPECIFIC PLAN. However, the target for each PA does not limit the number of dwelling units in a PA. A PA is permitted to build over or under the Target density so long as the PA total unit count does not exceed the top or bottom of its Land Use Designation range. In no case shall the SPECIFIC PLAN maximum total permitted residential dwelling units (16,655) be exceeded.

10.PLANNING. 22 SP - LC LANDSCAPING PLANS RECOMMND

All landscaping plans shall be prepared in accordance with Ordinance No. 859 (as adopted and any amendments thereto), the Riverside County Guide to California Landscaping, and Ordinance No. 348, Section 18.12. In the event conflict arises between Ordinance No. 859 and the SPECIFIC PLAN, then the requirements of Ordinance No. 859 shall prevail.

10.PLANNING. 23 SP - MITIG MEASURE 6.2-2 RECOMMND

Mitigation Measure 6.2-2 from EIR514 requires:

Prior to building final inspection, applicant shall provide for the purchasers of residential, commercial, and industrial units in planning areas that would be located adjacent to active agricultural land (either active agricultural land within the project site or adjacent to the project site's boundaries) to be notified pursuant to either the Right To Farm notice for Riverside County (Ordinance No.460) and/or Imperial County (Right-to-Farm

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.PLANNING. 23 SP - MITIG MEASURE 6.2-2 (cont.) RECOMMND

Ordinance) as appropriate.

10.PLANNING. 24 SP - MITIG MEASURE 6.3-17 RECOMMND

Mitigation Measure 6.3-17 from EIR514 requires:

Prior to issuance of the wastewater treatment facility building final permits for each tract map, the wastewater treatment facility shall enclose odor-generating processes and utilize other odor-abatement technologies as required under state and local regulations.

10.PLANNING. 25 SP - MITIG MEASURE 6.3-18 RECOMMND

Mitigation Measure 6.3-18 from EIR514 requires:

Prior to issuance of the wastewater treatment facility building final permits for each tract map, the wastewater treatment facility shall develop a protocol for handling odor complaints.

10.PLANNING. 26 SP - MITIG MEASURE 6.5-7 RECOMMND

Mitigation Measure 6.5-7from EIR514 requires:

If human remains are encountered during a public or private construction (earthmoving) activity, State Health and Safety Code 7050.5 states that no further disturbance shall occur until the Riverside or Imperial County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The Riverside County Coroner must be notified within 24 hours.

If the coroner determines that the burial is not historic, but prehistoric, the Native American Heritage Commission (NAHC) must be contacted to determine the most likely descendent (MLD) for this area. The MLD may become involved with the disposition of the burial following scientific analysis.

Upon clearance by the coroner and the NAHC for Native American remains, construction (earthmoving) activities may resume.

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.PLANNING. 27 SP - MITIG MEASURE 6.5-5 RECOMMND

Mitigation Measure 6.5-5from EIR514 requires:

If avoidance and/or preservation in place of cultural resources is not possible, the following mitigation measures shall be initiated for each impacted site:

(1) A participant-observer from the appropriate Indian Band or Tribe shall be used during archaeological testing or excavation in the project site.

(2) Prior to grading final, the project applicant shall develop a test level research design detailing how the cultural resource investigation shall be executed and providing specific research questions that shall be addressed through the excavation program. In particular, the testing program shall characterize the site constituents, horizontal and vertical extent, and, if possible, period of use. The testing program shall also address the California Register and National Register eligibility of the cultural resource and make recommendations as to the suitability of the resource for listing on either register. The research design shall be submitted to the County of Riverside Regional Park and Open-Space District or the County or Imperial Planning Department, as appropriate, for review and comment. For sites determined through the testing program to be ineligible for listing on either the California or National Register, execution of the testing program will suffice as mitigation of project impacts to this resource.

(3) Prior to the issuance of a grading permit issuance for each implementing project, and after approval of the research design, the project applicant shall complete the excavation program as specified in the research design. The results of this excavation program shall be presented in a technical report that follows the County of Riverside outline for Archaeological Testing. The Test Level Report shall be submitted to the County of Riverside Regional Park and Open-Space District or the County of Imperial Planning Department, for review and comment. If cultural resources that would be affected by the project are found ineligible for listing on the California or National Register, test level investigations will have depleted the scientific value of the sites and the project can proceed.

(4) If the resource is identified as being potentially

10. GENERAL CONDITIONS

10.PLANNING. 27 SP - MITIG MEASURE 6.5-5 (cont.) RECOMMND

eligible for either the California or National Register, and project designs cannot be altered to avoid impacting the site, a Treatment Program to mitigate project effects shall be initiated. A Treatment Plan detailing the objectives of the Treatment Program shall be developed. The Treatment Plan shall contain specific, testable hypotheses relative to the sites under study and shall attempt to address the potential of the sites to address these research questions. The Treatment Plan shall be submitted to the County of Riverside Regional Park and Open-Space District or Imperial Planning Department, as appropriate, for review and comment.

(5) After approval of the Treatment Plan, the Treatment Program for affected, eligible sites shall be initiated. A Treatment Program typically involves excavation of a statistically representative sample of the site to preserve those resource values that qualify the site as being eligible for the California or National Register. At the conclusion of the excavation or research program, a Treatment Report, following the outline of the County of Riverside for Archaeological Mitigation or Data Recovery, shall be developed. This data recovery report shall be submitted to the County of Riverside Regional Park and Open-Space District or Imperial Planning Department, as appropriate, for review and comment.

10.PLANNING. 28 SP - MITIG MEASURE 6.5-4 RECOMMND

Mitigation Measure 6.5-4from EIR514 requires:

Consultation and in conjunction with the Torres-Martinez Desert Cahuilla Indians is recommended to ascertain if Phase II Testing and Evaluation is warranted for CA-IMP-33 to assess the site's content, depth, and integrity for cultural deposits, as well as data removal. It is also recommended that the modern graffiti be carefully removed from Travertine Rock in its entirety, with special care not to damage the prehistoric rock art. It is also recommended that aesthetically pleasing and protective fencing be placed around Travertine Rock. And finally, Travertine Rock should be formally nominated as a Traditional Cultural Property (TCP).

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 RECOMMND

Mitigation Measure 6.5-2 from EIR514 requires:

The following standard policies and policy implementation measures shall be implemented prior to implementing project approval:

Cultural Resources Policy 1

Prior to grading final for each implementing project, a comprehensive survey program for unsurveyed areas within the project area shall be completed to identify, document, and protect, if feasible, prehistoric and historical archaeological sites, and sites containing Native American human remains.

Implementation Measure 1.1 The proposed project would be covered under the State CEQA Guidelines (California 2005) or Section 106 of the NHPA, and shall be surveyed by a professional who meets the Secretary of the Interior's Standards and Guidelines regarding archaeological activities and methods prior to the County's approval of proposed project plans and prior to grading final (48 CFR 44716-44742).

Implementation Measure 1.2 All archaeological site location data collected during the cultural resources surveys must be considered to be of a sensitive nature and must remain confidential. Caution must be exercised when disseminating this information; in particular, maps and site location data should be made available only to managers, County officials, and other professionals who have a legitimate need to know.

Implementation Measure 1.3 For potentially significant prehistoric archaeological resources or sites containing Native American human remains identified during the project's archaeological surveys, the project proponent, Federated Insurance Company or their designee, shall continue consultation with the NAHC in Sacramento and interested Native American individuals and organizations.

Cultural Resources Policy 2

Avoid impacts to potentially significant prehistoric and historical archaeological resources and sites containing Native American human remains, where feasible.

10. GENERAL CONDITIONS

10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 (cont.) RECOMMND

Implementation Measure 2.1 If cultural resources avoidance is feasible, potentially significant archaeological resources and sites containing Native American human remains shall be placed within permanent project-specific conservation easements or dedicated open space areas prior to grading final.

Implementation Measure 2.2 Where avoidance of archaeological resources and sites containing Native American human remains is not a feasible management option, capping these resources with sterile sediments and avoidance planting (e.g., planting of cactus, mesquite, or other native plants) shall be considered the next most favorable management option. In doing so, capping the resource(s) will ensure that indirect impacts from increased public availability to these sites are avoided. Plans for capping identified cultural resources shall be submitted to and approved by the County prior to map recordation.

Cultural Resources Policy 3

Reduce adverse impacts to significant archaeological resources that cannot be protected in place through data recovery excavations.

Implementation Measure 3.1 If avoidance and/or preservation in place of known prehistoric and historical archaeological resources is not a feasible management option, the project proponent shall ensure that potentially significant archaeological resource(s) and site(s) shall be investigated pursuant to the standards, guidelines, and principles of the Advisory Council's Treatment of Archaeological Properties: A Handbook (ACHP 1980).

Prior to grading final for each implementing project, the project applicant shall retain a qualified archaeologist who meets the Secretary of Interior's Standards and Guidelines, and shall use the project's Research Design detailed in the Phase I Cultural Resources Survey Report for the Travertine Point Specific Plan (Applied EarthWorks 2008) to guide the implementation of a Phase II Testing and Evaluation Program. In general terms, the Phase II Testing and Evaluation Program shall be designed to further define site boundaries and to assess the structure, content,

10. GENERAL CONDITIONS

10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 (cont.) (cont.) RECOMMND

nature, and depth of subsurface cultural deposits and features. Emphasis shall also be placed on assessing site integrity and the site's potential to address regional archaeological research questions. These data shall then be used to address the NRHP/CRHR eligibility requirements for the archaeological resource and make recommendations as to the suitability of the resource for listing on either the NRHP/CRHR.

Prior to grading final for each implementing project and after approval of the project's various cultural resources survey reports by the County, the project applicant shall retain a qualified archaeologist to complete the Phase II Testing and Evaluation Program as specified in the project's Phase II Testing and Evaluation Proposal and Research Design and prior to the issuance of a project grading permit. The results of this Phase II Testing Program shall be presented in a technical report that follows the State of California Office of Historic Preservation Archaeological Resource Management Report Recommended Contents and Format Guidelines (California 1990). The Phase II Report shall be submitted to the County's Planning Department for review and comment and the Torres-Martinez Desert Cahuilla Indians prior to the issuance of a project grading permit. If the resource is determined to be ineligible for listing on the NRHP or CRHR upon completion of the Phase II Testing Program, no further cultural resources management of this resource would be required.

Implementation Measure 3.2 A participant-observer(s) from the Torres-Martinez Desert Cahuilla Indians shall be present during Phase II archaeological excavations involving all sites of Native American concern.

Implementation Measure 3.2 A participant-observer(s) from the Torres-Martinez Desert Cahuilla Indians shall be present during Phase II archaeological excavations involving all sites of Native American concern. Implementation Measure 3.3?If the cultural resource is identified as being potentially eligible for listing on either the NRHP or CRHR, and project designs cannot be altered to avoid impacting the site, a Phase III Data Recovery Program to mitigate project effects shall be initiated. A Data Recovery Treatment Plan detailing the objectives of the Phase III Program shall be developed and

10. GENERAL CONDITIONS

10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 (cont.) (cont.) (conRECOMMND

shall contain specific testable hypotheses pertinent to the project's Research Design and relative to the site(s) under study. The Phase III Data Recovery Treatment Plan shall be submitted to the County's Planning Department, the Torres-Martinez Desert Cahuilla Indians, if applicable, and the SHPO for review and comment prior to implementation of the Data Recovery Program.

After approval of the Treatment Plan, the Phase III Data Recovery Program for affected, eligible site(s) shall be completed. Typically, a Phase III Data Recovery Program involves the excavation of a statistically representative sample of the site(s) to preserve those resource values that qualify the site(s) as being eligible for listing on the NRHP/CRHR. Again, participant-observer(s) from the Torres-Martinez Desert Cahuilla Indians shall be present during archaeological data-recovery excavations involving sites of Native American concern. At the conclusion of the Phase III Program, a Phase III Data Recovery Report shall be prepared, following the State of California Office of Historic Preservation Archaeological Resource Management Report Recommended Contents and Format Guidelines (California 1990).

The Phase III Data Recovery Report shall be submitted to the County's Planning Department, the Torres-Martinez Desert Cahuilla Indians, if applicable, and the SHPO for review and comment prior to the issuance of a project grading permit.

Implementation Measure 3.4 All archaeological materials recovered during implementation of the project's Phase II Testing or Phase III Data Recovery programs shall be processed, including cleaning and cataloging, detailed description, and analysis, as appropriate. Following completion of laboratory and analytical procedures, all project-related collections shall be suitably packaged and transferred to a curation facility that meets the standards of 36 CFR 79 for long-term storage. Materials to be curated include archaeological specimens and samples, field notes, feature and burial records, maps, plans, profile drawings, photo logs, photographic negatives, consultants' reports of special studies, and copies of the final technical reports.

It should be noted that provisions of the Native American Graves Protection Repatriation Act (NAGPRA) pertaining to

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10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 (cont.) (cont.) (conRECOMMND

Native American burials, sacred objects, and objects of cultural patrimony would come into effect when archaeological materials are recovered from lands owned by the Torres-Martinez Desert Cahuilla Indians and managed by the BIA. NAGPRA would also come into effect when ownership of the collections from anywhere within the Travertine Specific Plan study area is transferred to a curation repository that receives federal funding.

Cultural Resources Policy 4

Ensure proper identification and treatment of cultural resources discovered during project development and construction.

Implementation Measure 4.1 Registered professional archaeologists and culturally affiliated Native Americans, with knowledge in cultural resources, shall monitor all project-related ground-disturbing activities that extend into natural sediments in areas determined to have high archaeological sensitivity for prehistoric resources.

Prior to grading final for each implementing project, the project applicant shall include in its mitigation plan provisions for the identification and evaluation of archaeological resources inadvertently discovered during construction. If buried archaeological resources are uncovered during construction, all work shall be halted in the vicinity of the archaeological discovery until a registered professional archaeologist can visit the site of discovery and evaluate the significance of the archaeological resource.

Implementation Measure 4.2 If the archaeological resource is determined to be a potentially significant cultural resource, the project proponent's mitigation plan shall include provisions for the preparation and implementation of a Phase III Data Recovery Program, as well as disposition of recovered artifacts, in accordance with Cultural Resources Policy 3 Implementation Measure 4, above. The mitigation plan shall be reviewed and approved by the County prior to grading final.

Implementation Measure 4.3 In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery on privately owned or State-owned land,

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10. GENERAL CONDITIONS

10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 (cont.) (cont.) (conRECOMMND

the steps and procedures specified in Health and Safety Code Section 7050.5, State CEQA Guidelines 15064.5(d), and Public Resources Code Section 5097.98 shall be implemented. Specifically, in accordance with Public Resources Code (PRC) Section 5097.98, the Riverside County Coroner shall be notified within 24 hours of the discovery of potentially human remains. The Coroner shall then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the NAHC by phone within 24 hours, in accordance with PRC Section 5097.98. The NAHC shall then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification.

The MLD shall then have the opportunity to recommend to the project proponent means for treating or disposing, with appropriate dignity, the human remains and associated grave goods within 24 hours of notification. Whenever the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the MLD and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

It should be noted in the event that Native American human remains are inadvertently discovered during the County-permitted, project-related construction activities, there would be unavoidable significant adverse impacts to these resources. Implementation of the Cultural Resources Policies 1, 2, and 3 and their corresponding implementation measures would, however, reduce impacts to other types of archaeological resources to a level that is less than significant.

Implementation Measure 4.4 The treatment and management of potential TCPs identified with the Travertine Point Specific Plan study area shall be conducted through extensive consultation with concerned Native American groups and organizations. These consultation efforts shall be conducted utilizing the County of Riverside's SB 18

10. GENERAL CONDITIONS

10.PLANNING. 29 SP - MITIG MEASURE 6.5-2 (cont.) (cont.) (conRECOMMND

consultation process.

Cultural Resources Policy 5

Ensure that the project proponent shall bear all costs associated with cultural resources management within the County's jurisdiction.

Implementation Measure 5.1 The project proponent shall bear all expenses related to the identification, evaluation, and treatment of cultural resources directly or indirectly affected by project-related construction activity. Such expenses may include pre-field planning, field work, post-field analysis, research, interim and summary report preparation, and final report production (including draft and final versions), and costs associated with the curation of project documentation and the associated artifact collections.

Implementation Measure 5.2 Prior to grading final, on behalf of the County and the project applicant, the final technical reports detailing the results of the Phase II Testing or Phase III Data Recovery programs shall be submitted to the appropriate Archaeological Information Centers of the California Historical Resources Inventory System for their information and where they would be available to other researchers. Final Phase III Data Recovery Reports shall also be submitted to local libraries, schools, and historical societies to enable the general public to learn about their local cultural heritage.

10.PLANNING. 30 SP - MITIG MEASURE 6.22-2 RECOMMND

Mitigation Measure 6.22-2 from EIR514 requires:

The project proponent shall make every effort feasible to recycle, reuse, and/or reduce the amount of construction and demolition materials (i.e., concrete, asphalt, wood, etc.) generated by development of the project that would otherwise be taken to a landfill. This diversion of waste must exceed a 50 percent reduction by weight. The project shall complete the Riverside County Waste Management Department Construction and Demolition Waste Diversion Program Form B or and Form C process as evidence to ensure compliance. Form B (Recycling Plan) must be submitted and

10. GENERAL CONDITIONS

10.PLANNING. 30 SP - MITIG MEASURE 6.22-2 (cont.) RECOMMND

approved by the Riverside County Waste Management Department and provided to the Department of Building and Safety prior to the issuance of building permits. Form C (Reporting Form) must be approved by the Riverside County Waste Management Department and submitted to the Department of Building and Safety prior to the issuance of certificate of occupancy/final inspection.

10.PLANNING. 31 SP - MITIG MEASURE 6.22-3 RECOMMND

Mitigation Measure 6.22-3from EIR514 requires:

Applicant(s) shall dispose of any hazardous wastes, including paint, used during construction and grading at a licensed facility in accordance with local, state, and federal guidelines.

10.PLANNING. 32 SP - MITIG MEASURE 6.22-4 RECOMMND

Mitigation Measure 6.22-4 from EIR514 requires:

All commercial and residential refuse generated from the proposed project within Riverside County portion of the proposed project shall be delivered to the Coachella Valley Transfer Station or the Edom Hill Transfer Station; any residual waste that these transfer stations could not accept shall be disposed of at the Lamb Canyon Landfill or Badlands Landfill or other locations as determined by the Riverside County Waste Management Department. All commercial and residential refuse generated from the proposed project within the Imperial County portion of the proposed project shall be delivered to Salton City Landfill or other locations as determined by the Imperial County Waste Management Department.

10.PLANNING. 33 SP - MITIG MEASURE 6.22-5 RECOMMND

Mitigation Measure 6.22-5 from EIR514 requires:

The Homeowners Association established for the proposed development shall establish green waste recycling through its yard maintenance or waste hauling contracts. Green waste recycling includes such things as grass recycling (where lawn clippings from a mulching-type mower are left on the lawn) and on- or off-site composting. This measure shall be implemented to reduce green waste going to

10. GENERAL CONDITIONS

10.PLANNING. 33 SP - MITIG MEASURE 6.22-5 (cont.) RECOMMND

landfills. If such services are not available through the yard maintenance or waste haulers in the area, the HOA shall provide individual homeowners with information about ways to recycle green waste individually and collectively. Homeowners shall be notified of such in the CC&Rs.

10.PLANNING. 34 SP - MITIG MEASURE 6.7-1 RECOMMND

Mitigation Measure 6.7-1 from EIR514 requires:

Proposed school sites shall undergo subsequent environmental review prior to construction as required by the Coachella Valley Unified School District (CVUSD). Final locations shall be subject to the review and approval of the CVUSD subject to the requirements of the California Department of Education (CDE) and the Department of Toxic Substances Control (DTSC).

10.PLANNING. 35 SP - MITIG MEASURE 6.7-4 RECOMMND

Mitigation Measure 6.7-4 from EIR514 requires:

Prior to building final inspection for each development phase, the homeowner's associations (HOAs) shall coordinate with the CVMVCD to provide public pamphlets that provide information to minimize mosquito breeding grounds and the HOAs shall work with the CVMVCD to control the mosquito population.

10.PLANNING. 36 SP - MITIG MEASURE 6.7-5 RECOMMND

Mitigation Measure 6.7-5 from EIR514 requires:

Work crews shall use respirators during project clearing, grading, and excavation operations, in accordance with California Division of Occupational Safety and Health regulations. The cabs of grading and construction equipment shall be air conditioned.

10.PLANNING. 37 SP - MITIG MEASURE 6.7-6 RECOMMND

Mitigation Measure 6.7-6 from EIR514 requires:

Construction roads shall be paved, when possible, to reduce fugitive dust and potential exposure to the fungus; or the access road into the project site shall be paved or treated

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10.PLANNING. 37 SP - MITIG MEASURE 6.7-6 (cont.) RECOMMND

with environmentally safe dust control agents, and where unpaved shall be wetted two times per day to minimize dust.

10.PLANNING. 38 SP - MITIG MEASURE 6.7-7 RECOMMND

Mitigation Measure 6.7-7 from EIR514 requires:

Prior to building final inspection for each planning area, the HOA, in coordination with government authorities (i.e., California Fish and Game), shall prepare public outreach programs and information pamphlets regarding the potential danger of digesting fish and waterfowl tissue that would be contaminated with selenium.

10.PLANNING. 39 SP - MITIG MEASURE 6.8-4 RECOMMND

Mitigation Measure 6.8-4 from EIR514 requires:

Periodic inspection of the conditions of the channels will need to be performed year round and after significant precipitation events will be required to be performed by each homeowner-owner association (HOA). Annual inspection reports shall be prepared by each HOA, and submitted to and filed with the Coachella Valley Water District by June 30th of each calendar year.

10.PLANNING. 40 SP - MITIG MEASURE 6.8-7 RECOMMND

Mitigation Measure 6.8-7from EIR514 requires:

The location, nature, and importance of the subdrainage system shall be disclosed to the ultimate owners of the property, so that the property owners can avoid damage to the drains' or negatively affect the drains' performance. In addition to disclosure to potential homeowners, tile drains that cross onto private lots shall be protected by one or more of the following mechanisms: the creation of easements, CC&R protocols, identification through flagging or risers, or other suitable mechanisms.

10.PLANNING. 41 SP - MITIG MEASURE 6.8-9 RECOMMND

Mitigation Measure 6.8-9 from EIR514 requires:

Prior to implementing project approval for each phase or district, as appropriate, the applicant shall submit for

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10. GENERAL CONDITIONS

10.PLANNING. 41 SP - MITIG MEASURE 6.8-9 (cont.) RECOMMND

review and approval a hydrology report to further define flow conditions related to Channel 4 at SR-86S and for all channels east of SR 86S, and provide for the design of such facilities such that discharge is released in a manner consistent with pre-project/existing conditions, or alternatively, provide for storage or discharge flows within the boundaries of the northern portion of the proposed project or off-site with approval and easements from adjacent property owners.

10.PLANNING. 42 SP - MITIG MEASURE 6.8-11 RECOMMND

Mitigation Measure 6.8-11 from EIR514 requires:

Prior to implementing project approval for each phase or district, as appropriate, the applicant shall submit for review and approval a hydrology report to address potential sediment depositions in the Salton Sea and downstream properties. The report shall provide for design considerations to be implemented in proposed Channels 1, 2 and 3, as appropriate.

10.PLANNING. 43 SP - MITIG MEASURE 6.8-12 RECOMMND

Mitigation Measure 6.8-12 from EIR514 requires:

Prior to implementing project approval for each phase or district, as appropriate, the applicant shall submit for review and approval a plan for the management, operation and maintenance of the flood control system.

10.PLANNING. 44 SP - MITIG MEASURE 6.11-1 RECOMMND

Mitigation Measure 6.11-1 from EIR514 requires:

Where feasible and consistent with the Riverside County standards, any paving or repaving of off-site roadways that must be conducted in conjunction with implementation of the specific plan should utilize asphalt-rubber paving material consisting of 20 percent recycled rubber or more and 80 percent paving-grade asphalt. Studies have demonstrated that such paving material will reduce traffic noise by as much as 3 to 5 dB(A).

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10.PLANNING. 45 SP - MITIG MEASURE 6.11-2 RECOMMND

Mitigation Measure 6.11-2 from EIR514 requires:

With permission from the Riverside County Transportation Departments, speed limits on arterials experiencing significant noise impacts off-site should be reduced from existing speed limits. Each 5 mile per hour reduction in the speed limit can decrease the CNEL level by about 1 dB(A).

10.PLANNING. 46 SP - MITIG MEASURE 6.11-8 RECOMMND

Mitigation Measure 6.11-8 from EIR514 requires:

The project applicant shall require by contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:

-Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period.

-Ensure that construction equipment is properly muffled according to industry standards and in good working condition.

-Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.

-Schedule high noise-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption to sensitive uses.

-Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.

-Use electric air compressors and similar power tools rather than diesel equipment, where feasible.

-Construction-related equipment, including heavy-duty

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10. GENERAL CONDITIONS

10.PLANNING. 46 SP - MITIG MEASURE 6.11-8 (cont.) RECOMMND

equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes.

-Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the Riverside County or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by Riverside County prior to grading final.

The Riverside County Building and Safety Department shall monitor and oversee the BMPs to verify that they are implemented correctly by the construction contractors.

10.PLANNING. 47 SP - MITIG MEASURE 6.13-4 RECOMMND

Mitigation Measure 6.13-4 from EIR514 requires:

Prior to final building inspection for each implementing project, applicants for implementing projects shall provide final fire-flow plans to the RCFD and SCSD, as appropriate, which include fire-flow requirements within commercial projects to be based on square footage and type of construction associated with development of the structures.

10.PLANNING. 48 SP - MITIG MEASURE 6.13-5 RECOMMND

Mitigation Measure 6.13-5 from EIR514 requires:

Prior to final building inspection for each implementing project, applicants for implementing projects shall provide final fire flow plans to the RCFD ensuring that all water mains and fire hydrants providing required fire flows would be constructed in accordance with the appropriate development schedule sections of Riverside County Ordinance No. 460 and/or Ordinance No. 787. Each fire flow plan that is submitted would be reviewed and approved by the RCFD prior to final building inspection.

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10.PLANNING. 49 SP - MITIG MEASURE 6.21-1 RECOMMND

Mitigation Measure 6.21-1 from EIR514 requires:

Prior to implementing project approval of the first project phase in the proposed Specific Plan, the applicant shall prepare and submit to CVWD, SCSD, the County of Riverside for review and approval, as appropriate, a Wastewater Management Plan (WMP) that provides for the final location, development, and funding mechanisms of the wastewater conveyance infrastructure system and wastewater treatment system associated with development of the entire project. This WMP shall describe and finalize the design parameters and locations of piping necessary to convey wastewater originating within the project site for the specified tract. Each WMP shall also be submitted to the Regional Water Quality Control Board for approval and to ensure that the wastewater infrastructure conveyance system meets their requirements for collection and treatment of wastewater.

10.PLANNING. 50 SP - MITIG MEASURE 6.21-2 RECOMMND

Mitigation Measure 6.21-2 from EIR514 requires:

Prior to building final inspection for the first residential unit and/or commercial unit within the Riverside County portion of the proposed project, the applicant shall execute a Special Agreement with CVWD to design, permit, construct, operate, and maintain an expandable wastewater treatment plant and nonpotable water storage and distribution system. The agreement shall provide for the initial size of the treatment plant to meet the initial development requirements of the project. The agreement shall provide for the plant to be expanded as the project proceeds to meet the project's full wastewater flow requirements within Riverside County and CVWD jurisdiction (estimated to be 3.0 mgd). Wastewater treatment and reuse facilities are provided for in Planning Area 4-3 or alternately an off-site location as provided for in the Wastewater Master Plan (see Figure 3.0-21). The project applicant shall provide necessary funding for the construction of this facility. All wastewater treatment facilities will be creditable toward the facilities component of CVWD's Sanitation Capacity charge for all residential, commercial, and industrial structures within CVWD's portion of the project boundary. The applicant's financial responsibility for these facilities is only for those components of the wastewater treatment facilities

10. GENERAL CONDITIONS

10.PLANNING. 50 SP - MITIG MEASURE 6.21-2 (cont.) RECOMMND

necessary to provide wastewater treatment for the proposed project's and its associated effluent.

10.PLANNING. 51 SP - MITIG MEASURE 6.22-6 RECOMMND

Mitigation Measure 6.22-6 from EIR514 requires:

Prior to issuance of Building Permits for any multi-unit residential, commercial or industrial facilities, clearance from the Riverside County Waste management Department is needed to verify compliance with California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires the local jurisdiction to require adequate areas for collecting and loading recyclable materials.

10.PLANNING. 52 SP - MITIG MEASURE 6.22-8 RECOMMND

Mitigation Measure 6.22-8 from EIR514 requires:

Prior to implementing project approval for Planning Areas 2-17, 2-21, 2-19, and 2-20, the applicant(s) shall provide for a buffer and restrict development adjacent to the active or closed landfill from the Oasis Landfill property line for a distance of a minimum of 1,000 feet and a maximum of 1,320 feet originating at the Oasis Landfill disposal footprint, until the landfill is closed to provide adequate spacing for monitoring probes, as recommended by the RCWMD and in accordance with the Southern California Air Quality Management District's Rule 1150.1.

10.PLANNING. 53 SP - MITIG MEASURE 6.22-9 RECOMMND

Mitigation Measure 6.22-9 from EIR514 requires:

Prior to implementing project approval for Planning Areas 2-18 and 2-19, the Oasis landfill shall be closed by the RCWMD in accordance with CalRecycle guidelines for closure with waste in place.

10.PLANNING. 54 SP - MITIG MEASURE 6.22-10 RECOMMND

Mitigation Measure 6.22-10 from EIR514 requires:

Prior to implementing project approval in Planning Area 2-18, the applicant shall consult with officials from RCWMD and agree on a circulation plan for roads that would be

10. GENERAL CONDITIONS

10.PLANNING. 54 SP - MITIG MEASURE 6.22-10 (cont.) RECOMMND

developed around and adjacent to the Oasis Landfill site. Best Management Practices (BMPs) shall be developed and implemented within the circulation plan for Planning Areas 2-18 and 2-19 to avoid the restructuring of roadways around and adjacent to the Oasis Landfill.

10.PLANNING. 55 SP - MITIG MEASURE 6.23-4 RECOMMND

Mitigation Measure 6.23-4 from EIR514 requires:

Prior to the first implementing project approval for each development phase, the project applicant shall submit a plan for providing local transit services within the project site to the Riverside County Planning Department for review and approval.

10.PLANNING. 56 SP - HOLD HARMLESS (2) RECOMMND

The Desert Recreation District (DRD) or other designated entity responsible for park maintenance shall indemnify all usual park and recreational activities and shall be responsible for all maintenance and repair activities of improvements proposed by and for the SPECIFIC PLAN within Planning Area 2-18. This does not include Riverside County Waste Management facilities.

10.PLANNING. 57 SP - DRP CONSISTENCY RECOMMND

All implimenting projects must be consistent with the approved DISTRICT REFINEMENT PLAN of the corresponding DISTRICT, per the SPECIFIC PLAN.

10.PLANNING. 58 SP - DU/BLDG PERM MATRIX RECOMMND

Given the size and scope of the project, every condition of approval which uses the term "Building Permit" as a trigger point shall be interpreted to mean "Residential Dwelling Unit." For example a 100 unit apartment complex in one building shall count as 100 BUILDING PERMITS for purposes of these conditions, not simply one building permit. Additionally, the Matrix shall make it clear which residential units are within the County Jurisdiction and which are not. A total unit count, regardless of jurisdiction, must be shown as most conditions are triggered by a total project unit count for all jurisdictions.

10. GENERAL CONDITIONS

10.PLANNING. 58 SP - DU/BLDG PERM MATRIX (cont.) RECOMMND

For purposes of tracking the total build out of the SPECIFIC PLAN, the TLMA Counter Services Team shall maintain a TOTAL DWELLING UNIT TRACKING MATRIX. The matrix shall differentiate between individual building permits and the total number of dwelling units that are represented by the building permits that have been issued for the entire SPECIFIC PLAN. Any condition that requires a specific action at a specified "building permit issuance" shall use the TOTAL DWELLING UNIT TRACKING MATRIX to determine if the threshold has been met.

10.PLANNING. 59 SP - PUB BLDG STANDARDS RECOMMND

All public buildings which require an occupancy permit and are intended to be owned by the County upon completion shall comply with Board Policy H-29.

10.PLANNING. 60 SP - MODIFICATN TO CONDITIONS RECOMMND

Once the SPECIFIC PLAN is approved, in addition to any thresholds listed in the SPECIFIC PLAN, any modifications to the Conditions of Approval that affect the entire SPECIFIC PLAN shall require a SPECIFIC PLAN Amendment unless otherwise determined by the County Planning Director. Any modifications to the Conditions of Approval that only affect a specific DISTRICT shall require a Substantial Conformance determination to the SPECIFIC PLAN.

10.PLANNING. 61 SP - IMPERIAL SP APPROVAL RECOMMND

The County of Riverside adoption of the SPECIFIC PLAN only pertains to those areas where the County has jurisdiction. If for any reason Imperial County does not approve the portion of the SPECIFIC PLAN within Imperial County, or if Imperial County adopts a version of the SPECIFIC PLAN that is not in substantial conformance with the County of Riverside adopted SPECIFIC PLAN, then an amendment to the entire SPECIFIC PLAN, through the County of Riverside will be required to assure consistency.

10.PLANNING. 62 SP - IMPLEMENTING PROJECTS RECOMMND

For the purposes of this project, any condition of approval that refers to "implementing projects" shall include Schedule I subdivisions as identified in Ordinance No. 460.

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10.PLANNING. 63 SP - TILE DRAINS RECOMMND

Portions of the site are underlain by an existing tile drain system installed in the past to help control high groundwater levels and related saltation problems associated with former agricultural activities. If any tile drains exist within the boundaries of any implementing project, that project shall complete a review of the tile drain system to be submitted for review and approval by the County Geologist. Said study shall, at a minimum, determine if the drains are structurally sound, or if the system should be replaced. In no case shall a project with previous tile drains be permitted to develop without a tile drain system to control future groundwater levels which will assist in the mitigation of liquefaction. In addition these drains will help prevent the development of a "salt" crust related to evapotranspiration of landscape water.

Any future underground utility lines which intercept the existing tile drain system should be evaluated on a case-by-case basis to determine if they will interfere with or assist the performance of the existing tile drains. All underground utilities which may potentially provide for enhanced groundwater control should be incorporated into the existing system so as to provide additional control of the groundwater levels beneath this site. Any interference of a newly installed utility or any other underground installation (i.e. swimming pools, basements, etc.) with the existing tile drains should be addressed in such a way as to maintain the functionality of the tile drain system. If no tile drains are located this condition shall not apply.

10.PLANNING. 64 SP - DRP REQUIRED RECOMMND

Prior to or concurrent with the first approval of any implementing project within any DISTRICT, a Specific Plan Substantial Conformance application for a DISTRICT REFINEMENT PLAN shall be required in accordance with Section 3.13.1.1 of the SPECIFIC PLAN. No implementing project shall be approved before a DISTRICT REFINEMENT PLAN for the corresponding DISTRICT receives approval from the Planning Commission. DISTRICT REFINEMENT PLANS may be processed concurrently with implementing projects.

Note: The DISTRICT REFINEMENT PLAN is processed as a Specific Plan Substantial Conformance; however, once

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10. GENERAL CONDITIONS

10.PLANNING. 64 SP - DRP REQUIRED (cont.) RECOMMND

approved the Planning Director shall create a new LMS development number for the land management tracking system and all implementing projects within the respective DISTRICT shall be attached to the new DISTRICT REFINEMENT PLAN development number. Once the DISTRICT REFINEMENT PLAN is approved, all Specific Plan Conditions of approval shall be transferred into the new development number created by the DISTRICT REFINEMENT PLAN. All dwelling units shall be tracked at the DISTRICT level through the DISTRICT REFINEMENT PLAN development number and through the separate spread sheet referenced in condition 10.Planning.58 DU/BUILDING PERMIT MATRIX. Additionally, only Conditions of Approval approriate to the DISTRICT need be moved. Minor modifications to the Conditions of Approval are permitted for the DRP if said revisions are specific to the DISTRICT and do not significantly alter the intent of the Condition of Approval. This note shall not apply if an alternative permit tracking process to LMS is being used.

Once approved, the DISTRICT REFINEMENT PLAN shall be added as an appendix to the SPECIFIC PLAN and act as additional Design Standards for the respective DISTRICT."

10.PLANNING. 65 SP - NEIGHBORHOOD PARKS RECOMMND

A minimum of 6.6 acres of neighborhood parks shall be developed in conjunction for every 500 residential dwelling units.

10.PLANNING. 66 SP - AG SETBACKS RECOMMND

Existing Agricultural uses are allowed to continue during the development of the SPECIFIC PLAN. Proposals to improve, enhance, intensify and/or expand an existing agricultural operation shall be subject only to the approval of the Travertine Point Property Owners Association, provided the public's health, safety and welfare are protected and that no existing residential use is closer than 300 feet of the existing and/or proposed improvement, enhancement, intensification and/or expansion. Residential units associated with or ancillary to the existing agricultural operation are not included in the 300 foot setback requirement. Agricultural uses proposed less than 300 feet from existing residential uses would require a Conditional Use Permit.

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10.PLANNING. 67 MM - LANDFILL MOU IMP RECOMMND

All provisions of the Landfill MOU specified in condition of approval 30.PLANNING.2 shall be implemented throughout the life of the project to the satisfaction of the Riverside County Waste Management Department.

TRANS DEPARTMENT

10.TRANS. 1 SP - SP375/TS CONDITIONS RECOMMND

The Transportation Department has reviewed the Traffic Impact Analysis (TIA), dated March 9, 2009 submitted for the proposed project. The TIA has been prepared in accordance with County-approved guidelines. The Transportation Department has also reviewed the Traffic Study Supplement (TSS), dated August 5, 2010. We generally concur with the findings relative to traffic impacts.

The General Plan circulation policies require a minimum of Level of Service 'C', except that Level of Service 'D' may be allowed in community development areas at intersections of any combination of secondary highways, major highways, arterials, urban arterials, expressways or state highways and ramp intersections.

The TIA and TSS indicate that it is possible to achieve adequate levels of service for the following intersections based on the traffic study assumptions.

Harrison Street (NS) at:
62nd Avenue (EW)

Harrison Street (NS) at:
64th Avenue (EW)

Harrison Street (NS) at:
66th Avenue (EW)

Harrison Street (NS) at:
70th Avenue (EW)

Harrison Street (NS) at:
72nd Avenue (EW)

Harrison Street (NS) at:
74th Avenue (EW)

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10.TRANS. 1 SP - SP375/TS CONDITIONS (cont.) RECOMMND

Harrison Street (NS) at:
Pierce Street (EW)

Harrison Street (NS) at:
78th Avenue (EW)

Harrison Street (NS) at:
81st Avenue (EW)

Polk Street (NS) at:
74th Avenue (EW)

Fillmore Street (NS) at:
78th Avenue (EW)

Village Way (NS) at:
82nd Avenue (EW)

Village Way (NS) at:
Jewel Street (EW)

Village Way (NS) at:
Town Center Way North (EW)

Village Way (NS) at:
Town Center Way South (EW)

SR-86S Southbound Ramps (NS) at:
62nd Avenue (EW)

SR-86S Northbound Ramps (NS) at:
62nd Avenue (EW)

SR-86S Southbound Ramps (NS) at:
66th Avenue (EW)

SR-86S Northbound Ramps (NS) at:
66th Avenue (EW)

SR-86S Southbound Ramps (NS) at:
70th Avenue (EW)

SR-86S Northbound Ramps (NS) at:
70th Avenue (EW)

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10. GENERAL CONDITIONS

10.TRANS. 1 SP - SP375/TS CONDITIONS (cont.) (cont.) RECOMMND

SR-86S Southbound Ramps (NS) at:
74th Avenue (EW)

SR-86S Northbound Ramps (NS) at:
74th Avenue (EW)

SR-86S Southbound Ramps (NS) at:
81st Avenue (EW)

SR-86S Northbound Ramps (NS) at:
81st Avenue (EW)

SR-86 Southbound Ramps (NS) at:
Town Center Way (EW)

SR-86 Northbound Ramps (NS) at:
Town Center Way (EW)

SR-86 Southbound Ramps (NS) at:
Desert Shores Drive (EW)

SR-86 Northbound Ramps (NS) at:
Desert Shores Drive (EW)

SR-86 Southbound Ramps (NS) at:
Brawley Avenue (EW)

SR-86 Northbound Ramps (NS) at:
Brawley Avenue (EW)

SR-86 Southbound Ramps (NS) at:
Sea Oasis Boulevard (EW)

SR-86 Northbound Ramps (NS) at:
Sea Oasis Boulevard (EW)

SR-86 Southbound Ramps (NS) at:
Marina Drive (EW)

SR-86 Northbound Ramps (NS) at:
Marina Drive (EW)

Paseo Street (NS) at:
81st Avenue (EW)

Lincoln Street (NS) at:

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10. GENERAL CONDITIONS

10.TRANS. 1 SP - SP375/TS CONDITIONS (cont.) (cont.) (conRECOMMND

81st Avenue (EW)

Lincoln Street (NS) at:
Paseo Street (EW)

Lincoln Street (NS) at:
Jewel Street (EW)

Gateway Street (NS) at:
Town Center Way West (EW)

Jewel Street (NS) at:
Paseo Street North (EW)

Jewel Street (NS) at:
Paseo Street South (EW)

Jewel Street (NS) at:
Bayside Way (EW)

Town Center Way (NS) at:
Paseo Street North (EW)

Town Center Way (NS) at:
Paseo Street South (EW)

Travertine Estates (NS) at:
Paseo Street (EW)

A Street (NS) at:
Jewel Street (EW)

A Street (NS) at:
Desert Shores Drive (EW)

Sea Oasis Drive (NS) at:
Travertine Estates (EW)

Sea Oasis Drive (NS) at:
Desert Shores Drive (EW)

The associated conditions of approval incorporate mitigation measures identified in the traffic study, which are necessary to achieve or maintain the required level of service.

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10. GENERAL CONDITIONS

10.TRANS. 2 SP-SP375/DEF-PROJ DEV DISTS RECOMMND

In SP00375 five Development Districts are identified. The Planning Areas in each District are numbered as follows:

District 1:Planning Areas 1-1 through 1-23

District 2:Planning Areas 2-1 through 2-21

District 3:Planning Areas 3-1 through 3-12

District 4:Planning Areas 4-1 through 4-8

District 5:Planning Areas 5-1 through 5-15

10.TRANS. 3 SP-SP375/DEF-RDWY IMPVT PHASES RECOMMND

In the TSS for SP00375, dated August 5, 2010, nineteen (19) transportation improvement phases are identified. Following is a listing of the transportation system improvement phases and the Planning Areas that would be developed in each phase.

Rdwy Impvt Phase	Planning Areas Developed
1	1-1,1-2,1-3,1-5,1-7,1-8,1-12 (partial)
2a	1-9,1-12(partial),1-13,1-14,1-15
2b	1-4,1-6,1-11
2c	2-1,2-1,2-3
2d	2-8,2-9,2-14 (partial)
2e	1-16,4-5 (partial)
2f	2-19 (partial),2-20 (partial), 2-21,4-1
3a	1-10,2-4,2-5,2-6,2-7,2-10,2-11,2-12
3b	4-3,4-4 (partial), 5-1
3c	5-13
3d	2-13,2-14 (partial),2-15,2-16

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10. GENERAL CONDITIONS

10.TRANS. 3 SP-SP375/DEF-RDWY IMPVT PHASES (cont.) RECOMMND

3e	2-17, 2-18,2-19 (partial),2-20 (partial)
3f	4-2,4-5 (partial),4-6
3g	1-17,1-18,1-19,1-20,1-21,1-22,1-23
3h	4-7,4-8
3i	3-1,3-2
3j	3-3,3-4,3-5,3-6,3-7,3-8,3-9,3-10, 3-11,3-12
3k	4-4,5-2,5-3,5-4,5-5
3l	5-6,5-7,5-8,5-9,5-10,5-11,5-12, 5-14,5-15

If development occurs in a different order, or if there is substantial overlapping of phases, then a new traffic study shall be completed to determine if any improvements from the prior un-built phase need to be constructed to mitigate impacts caused by the phase being developed.

10.TRANS. 4 SP-SP375/FUND SR-86/SR-86S IMP RECOMMND

Recognizing that 00375 and other developments in Riverside and Imperial Counties along the SR-86/SR86-S will necessitate improvements along SR-86/SR-86S, Riverside County will take the lead in upgrading SR-86/SR-86S to a six-lane freeway between 62nd Avenue in Riverside County and Marina Drive in Imperial County. The six-lane freeway would have grade-separated interchanges in Riverside County at SR-86S/62nd Avenue, SR-86S/66th Avenue,SR-86S/70th Avenue, SR-86S/74th Avenue, SR-86S/81st Avenue, SR-86/Town Center Way North, and in Imperial County at SR-86/Desert Shores Drive, SR-86/Brawley Avenue, SR-86/Sea Oasis Boulevard, and SR-86/Marina Drive. Pending the outcome of further engineering, financial, environmental, and other studies, the County intends to establish a Road and Bridge Benefit District (RBBD), or other area-wide funding mechanism for the corridor, which includes this project site, in order to upgrade SR-86/SR-86S to a six-lane

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

10. GENERAL CONDITIONS

10.TRANS. 4 SP-SP375/FUND SR-86/SR-86S IMP (cont.) RECOMMND

freeway. The funding mechanism may have a two-tiered structure:

One tier to fund the addition of one lane in each direction along SR-86/SR-86S that would include the entire benefit corridor, and

A second tier consisting of several subareas within the benefit corridor to fund interchanges that would serve a specific subarea.

The Traffic Study for the Project used a 10 mile study area north and south of the Project site, which is twice the 5 mile study scope typically required by the County. Impacts within the study scope area are fully mitigated as set forth in this EIR. Possible impacts beyond the 10 mile study area are deemed too speculative to evaluate at this time, given various unknown factors such as the pace of Specific Plan implementation over an estimated 30-40 year build out, the pace of other improvements to local roads and highways during that 30-40 year project build out, and the pace of other development in the vast area north and south of the Specific Plan site that may contribute trips but also funding sources for road and highway improvements. The project conditions of approval require that all future tract maps be conditioned to provide updated traffic studies prior to final map approval. Those traffic studies shall include an analysis of potentially significant traffic impacts beyond the 10 mile study scope established by the County for the Specific Plan traffic study. To the extent that future traffic studies, required for all implementing tract maps, show any significant impacts beyond the 10 mile study area used for the Specific Plan traffic study, including but not limited to significant impacts to 86s, the I-10, and/or local roadways, the tract map applicants shall be required to participate in an RBBD, or other similar financial mechanism such as a CFD, to mitigate such impacts to a less than significant level. Implementing projects of SP375 shall be required to pay CVAG TUMF fees. The fees collected can also be made eligible, through the CVAG transportation prioritization process, for regional improvements within and beyond the study area.

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20. PRIOR TO A CERTAIN DATE

PLANNING DEPARTMENT

20.PLANNING. 1 SP - 90 DAYS TO PROTEST RECOMMND

The applicant has ninety (90) days from the date of the approval of these conditions to protest, in accordance with the procedures set forth in Government Code Section 66020, the imposition of any and all fees, dedications, reservations, and/or exactions imposed on this project as a result of the approval or conditional approval of this project.

20.PLANNING. 2 SP - SUBMIT FINAL DOCUMENTS RECOMMND

Within 60 days of the tentative approval of the project by the Board of Supervisors and prior to closing the DBF accounts for the project, Four (4) hard copies and Fifteen (15) copies on CD of the final SPECIFIC PLAN and EIR documents (SP/EIR) documents shall be submitted to the Planning Department for review, approval and distribution.

The documents shall include all the items listed in the condition titled "SP - Documents". The final SP/EIR documents shall be distributed in the following fashion:

One hard copy to the Planning Counter Services Division,

One hard copy to the Planning Department Library,

One hard copy to the Desert Office,

One hard copy to the Planning Department Project Manager,

Digital versions (CD) to the following:

Building and Safety Department 1 copy

Department of Environmental Health 1 copy

Fire Department 1 copy

Flood Control and Water Conservation District 1 copy

Transportation Department 1 copy

Executive Office - CSA Administrator 1 copy

SPECIFIC PLAN Case #: SP00375 Parcel: 755-310-045

20. PRIOR TO A CERTAIN DATE

20.PLANNING. 2 SP - SUBMIT FINAL DOCUMENTS (cont.) RECOMMND

Clerk of the Board of Supervisors 1 copy

Any park provider if not the CSA 1 copy

Any and all remaining documents shall be kept with the Planning Department in Riverside, or as otherwise determined by the Planning Director.

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E HEALTH DEPARTMENT

30.E HEALTH. 1 SP-WATER AND SEWER WILL SERVE RECOMMND

A "will serve" letter from the agency serving potable water and sanitary sewers is required.

30.E HEALTH. 2 SP - LEA CLEARANCE RECOMMND

Clearance from Environmental Resource Management Division (Local Enforcement Agency) is required.

EPD DEPARTMENT

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR DRAFT

TRAVERTINE POINT EIR MITIGATION IDENTIFIED FOR SP 375 (SOURCE: Impact Sciences, Inc. EIR 514

As stated in the EIR 514 Section 6.4, Biology potentially significant impacts would occur to special-status plant species, Palm Springs round-tailed ground squirrel, western yellow bat, and burrowing owl with the implementation of the proposed Travertine Point Specific Plan. The sensitive plant community of blue palo verde wash woodland is present on site and will be impacted by project implementation. No impacts will remain potentially significant after application of the proposed mitigation measures.

The following mitigation measure shall be implemented for activities that would occur within the jurisdiction of Riverside County or Imperial County. Where the mitigations identify activities that would

30. PRIOR TO ANY PROJECT APPROVAL

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) DRAFT

occur on tribal lands, the mitigations are recommended; the implementation of the mitigation measures on tribal lands will require consideration and approval by the Torres-Martinez Desert Cahuilla Indians (TMDCI). However, as noted in the Project Description (see Section 3.5), the project is subject to the implementation of a Memorandum of Understanding (MOU) between Riverside County, Imperial County, and TMDCI to address issues relating to tribal involvement on the properties within the boundaries of the specific plan. The MOU will, among other requirements, include that proposed mitigations that involve tribal lands will be permitted and implemented. Therefore, the mitigation proposed herein will apply to the entire project regardless of jurisdiction. The project proponent will be required to demonstrate compliance and address the potential impacts to the resources through project design.

6.4-1: Prior to implementing project approval, a qualified biologist currently holding an MOU with Riverside County shall conduct a focused survey for the two special-status plant species observed within the Riverside County portion of the proposed project site, chaparral sand verbena and Peirson's pebble pincushion, which are not covered under the CVMSHCP within the proposed development areas in order to determine the extent of individual plants to be impacted by the implementing project design. Impacts resulting from project construction to the two special-status plant species observed shall be mitigated through a seed collection and planting program. The planting program will be reviewed and approved by CDFG and will include provisions for monitoring success criteria and performance standards.

6.4-2: Prior to implementing project approval, the project applicant shall retain a qualified biologist currently holding an MOU with Riverside County, to collect seed from specialstatus plant species individuals during the appropriate season (after the blooming period, when seeds have formed). The collected seed shall be planted in predetermined

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30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

suitable habitat in an appropriate area within Open Space(Conservation) on the project site that will not be impacted by project development or subsequent activities. A portion of Sonoran creosote bush scrub and blue palo verde wash woodland located in the southern portion of the proposed project site will remain undeveloped upon implementation of the proposed project. In addition, appropriate disturbed/recovering Sonoran creosote bush scrub areas will also be areas for potential seed planting.

6.4-3: Prior to implementing project approval, the project applicant shall protect those portions of Sonoran creosote bush scrub and blue palo verde wash woodland occurring within the Open Space-Conservation land use category through a conservation easement, deed restriction, or similar mechanism. This area provides suitable habitat for relocation of chaparral sand verbena and Peirson's pebble pincushion. A report documenting the seed collection and planting plan shall be submitted to the Riverside County Environmental Programs Department.

6.4-4: Impacts resulting from project construction within the Riverside County portion of the proposed project site to those special-status wildlife species covered under the CVMSHCP, including desert pupfish, flat-tailed horned lizard, Yuma clapper rail, burrowing owl, Crissal thrasher, Le Conte's thrasher, western yellow bat, Palm Springs round-tailed ground squirrel, and Palm Springs pocket mouse, shall be mitigated through payment of the CVMSHCP Local Development Mitigation Fee.
Prior to implementing project approval, fee payment shall be made by the project applicant to Riverside County. The fee payment shall be made at the cost per acre provided at the time of payment in the CVMSHCP and updated by the Coachella Valley Conservation Commission.

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30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

6.4-5: Impacts resulting from project construction within the Riverside County portion of the proposed project site to Couch's spadefoot, which is not covered under the CVMSHCP, shall be mitigated. Prior to implementing project approval, in areas of suitable habitat for Couch's spadefoot on the project site, a qualified biologist currently holding an MOU with Riverside County shall conduct focused surveys including areas of ruts or small pools, as well as the irrigation ponds, and relocate any toad individuals or eggs found. The survey shall be conducted during the active season of Couch's spadefoot (which corresponds with the rainy season). The survey results shall be submitted to the Riverside County Environmental Programs Department and Imperial County and CDFG.

6.4-6: Prior to implementing project approval, if the above surveys result in the observation of Couch's spadefoot within project impact areas, observed individuals and/or eggs shall be removed from project impact areas (with the prior approval of the CDFG) and relocated to predetermined suitable habitat in an appropriate area within Open Space-Conservation areas on the project site that will not be impacted. A portion of Sonoran creosote bush scrub and blue palo verde wash woodland located in the southern portion of the proposed project site will remain undeveloped upon implementation of the proposed project. Prior to implementing project approval, the project applicant shall protect those portions of Sonoran creosote bush scrub and blue palo verde wash woodland occurring within the Open Space-Conservation land use category through a conservation easement, deed restriction, or similar mechanism, as required by Mitigation Measure 6.4-3. If suitable habitat for relocation of Couch's spadefoot is found within this area, toad individuals or eggs will be taken to this location. In addition, suitable

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30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

disturbed/recovering Sonoran
creosote bush scrub areas will also be considered for
relocation efforts.

6.4-7: Prior to implementing project approval, impacts
resulting from project construction to
rosy boa, which is not covered under the CVMSHCP, within
the Riverside County
portion of the proposed project site shall be mitigated
through pre-construction surveys
and relocation. The applicant shall retain a qualified
biologist currently holding an MOU
with Riverside County to conduct focused pre-construction
surveys for individuals of
this species within suitable habitat for the species.
Surveys shall be conducted within
suitable habitat located within 500 feet of the grading
limits. Surveys shall include an
examination of those portions of Sonoran creosote bush
scrub, blue palo verde wash
woodland, disturbed/recovering Sonoran creosote bush scrub,
and saltbush scrub
habitats that will be developed as part of project
implementation.
If rosy boa individuals are found, an active trapping and
relocation program, conducted
by a qualified biologist currently holding an MOU with
Riverside County and in
coordination with the CDFG, that will move individuals to
suitable on-site habitat that
will not be directly impacted by project implementation,
shall take place. A portion of
Sonoran creosote bush scrub and blue palo verde wash
woodland located in the southern
portion of the proposed project site will remain
undeveloped upon implementation of
the proposed project.
In the event that off-site habitat areas within 500 feet of
grading are not accessible during
preconstruction surveys, the presence of rosy boa shall be
assumed and the entire project
site boundary within 500 feet of grading activities shall
be fenced to prohibit entry of rosy
boa into the grading site. The fence shall be monitored as
a regular part of construction
monitoring.

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30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

Prior to implementing project approval, the project applicant shall protect those portions of Sonoran creosote bush scrub and blue palo verde wash woodland occurring within the Open Space-Conservation land use category through a conservation easement, deed restriction, or similar mechanism, as required by Mitigation Measure 6.4-3. This area provides suitable habitat for relocation of rosy boa.

6.4-8: Prior to implementing project approval, impacts resulting from project construction within the Riverside County portion of the proposed project site to special-status bird species not covered under the CVMSHCP, which include loggerhead shrike and blacktailed gnatcatcher, shall be mitigated through pre-construction surveys for nesting individuals of these species. Such surveys may be conducted concurrently with general nesting bird surveys, discussed in Mitigation Measure 6.4-13, below, and shall follow the methodology given in Mitigation Measure 6.4-13. If construction activities on the site are proposed during the nesting/breeding season (February 1 through August 31), a pre-activity survey shall be conducted by a qualified biologist currently holding an MOU with Riverside County prior to implementing project approval, to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. Once the survey is complete, a report shall be prepared and sent to the Environmental Programs Department for review and concurrence. If active nests are observed and located, consultation with the California Department of Fish and Game (CDFG) to establish appropriate buffers will be required and the results of the report shall be submitted to CDFG for review and approval. The Environmental Programs Department will be contacted to ensure that proper CDFG approved buffers are in place prior to grading final. No grading permits

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will be issued until the Environmental Programs Department confirms the presence of
appropriate buffers. In addition, a biological monitor will also be required to be on site
during all grading activities to ensure that the buffers are not compromised. At the
conclusion of all grading activity, the biological monitor will submit a letter report to the
Environmental Programs Department summarizing the result of the grading activity.
Focused surveys for nesting loggerhead shrike and black-tailed gnatcatcher individuals
shall be conducted in trees and shrubs of Sonoran creosote bush scrub, blue palo verde
wash woodland, disturbed/recovering Sonoran creosote bush scrub, and saltbush scrub
habitats that will be developed as part of project implementation or that is located within
500 feet of development areas. Because of the high mobility of non-nesting adult
individuals of these species, it is expected that surveys for nesting individuals and their
young, and protection for any nesting birds found, will provide the mitigation
appropriate for project-related impacts. Where nesting loggerhead shrike and/or blacktailed
gnatcatcher individuals are found, protection of nests shall include postponing or
halting clearing and construction activities within 500 feet of the nest until the nest is
vacated and juveniles have fledged and there is no evidence of a second attempt at
nesting, as determined by the biologist Construction personnel shall be instructed on the
sensitivity of nest areas and shall be instructed to avoid entering the approved buffers
around the nest. The biologist shall serve as a construction monitor during those periods
when construction activities will occur near active nest areas (within 500 feet) to ensure
that no inadvertent impacts on these nests will occur. The results of the survey, as well as
any avoidance measures taken and the success of those measures, shall be submitted to
the Riverside County Environmental Programs Department within 30 days of completion

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30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

of the pre-construction surveys and/or construction nest monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

6.4-9: Prior to implementing project approval, impacts resulting from project construction within the Riverside County portion of the proposed project site to pallid San Diego pocket mouse, which is not covered under the CVMSHCP, shall be mitigated through focused surveys utilizing small mammal trapping and relocation of this species. The applicant shall retain a qualified biologist currently holding a MOU with Riverside County to conduct the trapping. The survey results shall be submitted to the Riverside County Environmental Programs Department and CDFG. Prior to implementing project approval, if pallid San Diego pocket mouse is found during small mammal trapping efforts, an active trapping and relocation program shall be conducted by a qualified biologist currently holding a MOU with Riverside County, in coordination with the CDFG. The active trapping and relocation program shall move individuals to suitable on-site or off-site habitat that will not be directly impacted by project implementation. A portion of Sonoran creosote bush scrub and blue palo verde wash woodland located in the southern portion of the proposed project site will remain undeveloped upon implementation of the proposed project. Prior to implementing project approval, the project applicant shall protect those portions of Sonoran creosote bush scrub and blue palo verde wash woodland occurring within the Open Space-Conservation land use category through a conservation easement, deed restriction, or similar mechanism, as required by Mitigation Measure 6.4-3. This area provides suitable habitat for relocation of pallid San Diego pocket mouse.

6.4-10: Prior to implementing project approval, impacts

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30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

resulting from project construction
within the Riverside County portion of the proposed project
site to Colorado Valley
woodrat, which is not covered under the CVMSHCP, shall be
mitigated through
pre-construction surveys and relocation. The applicant
shall retain a qualified biologist
currently holding an MOU with Riverside County, to conduct
focused pre-construction
surveys for individuals of this species within suitable
habitat for the species. Surveys
shall be conducted within suitable habitat located within
500 feet of grading limits.
Surveys shall include an examination of those portions of
Sonoran creosote bush scrub,
blue palo verde wash woodland, disturbed/recovering Sonoran
creosote bush scrub, and
saltbush scrub habitats that will be developed as part of
project implementation. The
biologist shall survey for Colorado Valleywoodrat nests.
Where a Colorado Valley woodrat nest is found, it shall be
determined by the biologist in
which direction escape by any rat individuals occurring
inside the nest will be
encouraged. Vegetation around the nest in the opposite
direction shall be cleared to
discourage woodrat individuals from moving in that
direction. Once vegetation in that
direction is cleared, the nest shall be nudged with a
front-end loader, encouraging any
woodrats in the nest to exit the structure in the direction
that leads toward adjacent
habitat occurring within the Open Space-Conservation land
use category of the proposed
project or alternatively within areas near the project site
(such as ABDSP and SRSJM
National Monument, or other state or federally controlled
open space lands as allowable
by the administering agencies) including areas within
conservation easements). Once any
woodrats present in the nest have been encouraged to exit
the nest, nest materials shall
be carefully and slowly picked up with a front end loader
(slowly enough that any
woodrats remaining in the nest can escape), and the
materials shall be moved to adjacent

30. PRIOR TO ANY PROJECT APPROVAL

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

suitable habitat, as noted above, that will not be impacted by project development, where woodrats may scavenge nest materials to build newnests. Due to hantavirus hazards, the nest shall not be excavated by hand, and nest materials shall not be carried by hand. In the event that off-site habitat areas within 500 feet of grading are not accessible during preconstruction surveys, the presence of Colorado Valley woodrat shall be assumed and the entire project site boundary within 500 feet of grading activities shall be fenced to prohibit entry of woodrats into the grading site. The fence shall be monitored as a regular part of construction monitoring.

6.4-11: Prior to implementing project approval, impacts resulting from project construction within the Riverside County portion of the proposed project site to American badger, which is not covered under the CVMSHCP, shall be mitigated through a pre-construction clearance survey. The applicant shall retain a qualified biologist currently holding an MOU with Riverside County to conduct focused pre-construction surveys for individuals of this species within suitable habitat for the species. Surveys shall be conducted within suitable habitat located within 500 feet of grading limits. Surveys shall include an examination of those portions of Sonoran creosote bush scrub, blue palo verde wash woodland, disturbed/recovering Sonoran creosote bush scrub, and saltbush scrub habitats that will be developed as part of project implementation.

Prior to implementing project approval, if an active American badger burrow is located within project impact areas, a relocation program shall be implemented to remove the individual(s) from the area. The relocation program may be passive, in which badgers are excluded from occupied burrows by installation of a one-way door in burrow entrances, monitoring of the burrow for one week to confirm badger

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30. PRIOR TO ANY PROJECT APPROVAL

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

usage has been discontinued,
and hand excavation and collapse of the burrow to prevent reoccupation; or the
relocation program may be active, in which badger individuals are safely captured and
transported to suitable habitat outside the impact area. Trapped individuals of the above
species shall be safely relocated onto on-site Sonoran creosote bush scrub and blue palo
verde wash woodland habitat located in of the project site that is not planned for
development. A portion of Sonoran creosote bush scrub and blue palo verde wash
woodland located in the southern portion of the proposed project site will remain
undeveloped upon implementation of the proposed project. In the event that off-site habitat areas within 500 feet of grading are not accessible during
preconstruction surveys, the presence of American badger shall be assumed and the
entire project site boundary within 500 feet of grading activities shall be fenced to
prohibit entry of badgers into the grading site. The fence shall be monitored as a regular
part of construction monitoring.
Prior to implementing project approval for each implementing project, the project
applicant shall protect those portions of Sonoran creosote bush scrub and blue palo verde
wash woodland occurring within the Open Space (Conservation) land use category
through a conservation easement, deed restriction, or similar mechanism, as required by
Mitigation Measure 6.4-3. This area provides suitable habitat for relocation of American
badger and sufficient carrying capacity is assumed for the conserved areas.

6.4-12: Prior to implementing project approval, impacts resulting from project construction
within the Riverside County portion of the proposed project site to special-status bird
species not covered under the CVMSHCP, which include great egret, great blue heron,
black-crowned night heron, double-crested cormorant, snowy egret, gull billed tern,

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30. PRIOR TO ANY PROJECT APPROVAL

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

white-faced ibis, and black skimmer, shall be mitigated through pre construction surveys for nesting individuals of these species. Such surveys may be conducted concurrently with general nesting bird surveys, discussed in Mitigation Measure 6.4-13, below, and shall follow the methodology given in Mitigation Measure 6.4-13. If construction activities on the site are proposed during the nesting/breeding season (February 1 through August 31), a pre-activity survey shall be conducted by a qualified biologist currently holding an MOU with Riverside County prior to implementing project approval, to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. Once the survey is complete a report shall be prepared and sent to the Environmental Programs Department for review and concurrence. If active nests are observed and located consultation with the California Department of Fish and Game (CDFG) to establish appropriate buffers will be required and the results of the report shall be submitted to CDFG for review and approval. The Environmental Programs Department will be contacted to ensure that proper CDFG approved buffers are in place prior to grading final. No grading permits will be issued until the Environmental Programs Department confirms the presence of appropriate buffers. In addition, a biological monitor will also be required to be on site during all grading activities to insure that the buffers are not compromised. At the conclusion of all grading activity, the biological monitor will submit a letter report to the Environmental Programs Department summarizing the result of the grading activity. Focused surveys for nesting individuals of these species shall be conducted in trees and shrubs and on the ground of Salton Sea shoreline habitat and arrowweed scrub adjacent to the Salton Sea that will be developed

30. PRIOR TO ANY PROJECT APPROVAL

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

as part of project implementation or that is located within 500 feet of development areas.
Because of the high mobility of non-nesting adult individuals of these species, it is
expected that surveys for nesting individuals and their young, and protection for any
nesting birds found, will provide the mitigation appropriate for project-related impacts.

6.4-13: Proposed project construction impacts to nesting birds located in project impact areas
within the Riverside County portion of the project site shall be mitigated through
pre-construction nesting bird surveys and avoidance of any nesting birds found.
If construction activities on the site are proposed during the nesting/breeding season
(February 1 through August 31), a pre-activity survey shall be conducted by a qualified
biologist currently holding an MOU with Riverside County prior to implementing
project approval, to determine if active nests of species protected by the Migratory Bird
Treaty Act (MBTA) or the California Fish and Game Code are present in the construction
zone. Once the survey is complete, a report shall be prepared and sent to the
Environmental Programs Department for review and concurrence. If active nests are
observed and located, consultation with the California Department of Fish and Game
(CDFG) to establish appropriate buffers will be required and the results of the report
shall be submitted to CDFG for review and approval. The Environmental Programs
Department will be contacted to ensure that proper CDFG approved buffers are in place
prior to grading final. No grading permits will be issued until the Environmental
Programs Department confirms the presence of appropriate buffers. In addition, a
biological monitor will also be required to be on site during all grading activities to
insure that the buffers are not compromised. At the conclusion of all grading activity, the
biological monitor will submit a letter report to the

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30. PRIOR TO ANY PROJECT APPROVAL

30.EPD. 1 EIR MIT. PRIOR TO PROJECT APPR (cont.) (cont.DRAFT

Environmental Programs Department
summarizing the result of the grading activity. Prior to grading final for each
implementing project for construction or site preparation, including grubbing or grading,
the applicant shall have weekly surveys conducted by a qualified biologist currently
holding an MOU with Riverside County to determine if active nests of native bird species
(including the special-status species discussed above) protected by the Migratory Bird
Treaty Act and/or the California Fish and Game Code are present in the construction
zone or within 300 feet (500 for raptors) of the construction zone. Surveys shall take place
in all habitat types containing trees, shrubs, or grasses. Because many birds known to the
project area (including loggerhead shrike) nest during the late winter, breeding bird
surveys shall be carried out both during the typical nesting/breeding season (mid-March
through September) and in January, February, and early March for winter nesting
species. The surveys shall continue on a weekly basis, with the last survey being
conducted no more than three days prior to initiation of clearance or construction work.
If ground-disturbing activities are delayed, then additional pre-construction surveys
shall be conducted such that no more than three days will have elapsed between the last
survey and the commencement of ground disturbing activities. Surveys shall include
examination of trees, shrubs, and the understory, as several bird species known to the
area and project site, are ground nesters, including burrowing owl, California horned
lark, and mourning dove.

FIRE DEPARTMENT

30.FIRE.999 SP - CONTACT FIRE REQUIRED

Applicant shall contact the Strategic Planning Bureau and submit a separate Memorandum of Understanding and/or Fire Mitigation Agreement for fire station design, construction

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30. PRIOR TO ANY PROJECT APPROVAL

30.FIRE.999 SP - CONTACT FIRE (cont.) REQUIRED

and equipment purchase.

PARKS DEPARTMENT

30.PARKS. 1 SP - SP TRAILS PLAN RECOMMND

PRIOR TO THE APPROVAL OF ANY PROJECT (TENTATIVE MAP, USE PERMIT, AND/OR CHANGE OF ZONE):

The applicant is required to submit a trails plan for the project to the Riverside County Regional Park and Open-Space District for review and approval prior to project approval. The plan is to show an internal trail network and all connections to both the County of Riverside and County of San Diego trails systems and surrounding cities. It is provide typical cross sections for proposed development.

The applicant and its representative is advised to coordinate a meeting with the Planning staff at the Regional Park and Open-Space District to review trails and trail standards. The District's phone number is 951.955.4310

PLANNING DEPARTMENT

30.PLANNING. 1 MM - TRIBAL MOU RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the applicant shall secure a Memorandum of Understanding (MOU) between (a) the applicat, Riverside County, and the Torres Martinez Desert Cahuilla Indians (TMDCI) and (b) the applicant, Imperial County, and the TMDCI to address issues relating to tribal involvement on the properties within the boundaries of the specific plan and the application of EIR mitigation measures for the entire project site.

The MOU shall, at a minimum, include:

a. a tax-sharing arrangement between each County and the TMDCI;

b. assurances that drainage can and will be maintained across tribal land in perpetuity;

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 1 MM - TRIBAL MOU (cont.) RECOMMND

c. assurances that conservation easements can and will be maintained on tribal land in perpetuity;

d. assurances that the roads and circulation through tribal land will remain open to the public;

e. assurances that the land uses on tribal land will remain compatible with those areas in each County areas surrounding the tribal land;

f. permission to perform studies, including but not limited to, health risk assessments and biological surveys to ensure that public health and safety are maintained;

g. that proposed mitigations that involve tribal lands shall be permitted and implemented on all land within the project site; and

h. a limited waiver of sovereign immunity by the TMDCI sufficient to ensure that each County has an adequate legal remedy with respect to enforceability of the above items.

30.PLANNING. 2 MM - WASTE MGMT MOU (1) RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN, the County of Riverside Waste Management Department and the applicant shall enter into a Memorandum of Understanding (MOU) regarding the entire 166.6-acre County owned property, which includes the Oasis Landfill (two parcels consisting of APN 737-240-003 consisting of 161 acres and APN 737-200-032 consisting of 5.6 acres, and also referred as Planning Areas 2-18 and 2-19 of the SPECIFIC PLAN). If a portion of the 166.6 acre aforementioned property is not used as a regional style park, an amendment to the SPECIFIC PLAN shall be filed to specify an alternate location for a regional style park.

The Oasis Landfill shall remain open and active until Riverside County decides in its discretion to close the Oasis Landfill. The applicant shall use approximately 116.6 acres of the Oasis Landfill site as a future regional style park or other related uses (e.g., drainage). If the Oasis Landfill is to be used as a park site or otherwise developed, a formal agreement must be entered into between Riverside County and applicant or their successors and

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 2 MM - WASTE MGMT MOU (1) (cont.) RECOMMND

assigns, allowing for development of the 116.6-acre site for the use proposed by the applicant.

The MOU shall, at a minimum:

a. provide that approximately 50 acres of the Oasis Landfill site within the 161-acre parcel (APN 737-240-003), including the 23 acres currently permitted and used for solid waste disposal, will remain owned by the Riverside County Waste Management Department (the 50-acre site);

b. specify applicant's obligation to provide replacement off-site acreage (in fee simple title), for the 116.6 acres of non-landfill acreage owned by the County within the project site (i.e., SPECIFIC PLAN Planning Area 2-18 and the 166.6 acres owned by the County less the 50 acre site for the Oasis Landfill), in an acreage amount and location acceptable to the Riverside County Waste Management Department. The acreage amount shall not exceed 116.6 replacement acres. Other financial arrangements acceptable to the Riverside County may also be made in lieu of providing 116.6 replacement acres to the County;

c. specify the amount and timing of applicant's obligations, if any, with respect to funding the Box Canyon/State Highway 195 realignment and securing any and all necessary right-of-way approvals for such realignment;

d. provide that the applicant shall be responsible for mitigating the land use compatibility impacts associated with developing the SPECIFIC PLAN area and shall fund all mitigation costs necessary to make development activities compatible with adjacent Oasis Landfill (including, but not limited to screening, enhanced security, and enhanced environmental monitoring);

e. provide that applicant shall convey easements to the County sufficient to allow for the County's environmental monitoring/control activities within areas adjacent to the Oasis Landfill site;

f. provide that the Riverside County Waste Management Department and Riverside County is defended and indemnified for any liabilities arising out of applicant's activities on the 116.6 acre site;

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 2 MM - WASTE MGMT MOU (1) (cont.) (cont.) RECOMMND

g. provide that Riverside County Waste Management Department shall continue to be responsible for all monitoring and maintenance activity on the 50-acre site.

In the event that the Developer and/or the County elects not to enter into an MOU, then a Specific Plan Amendment shall be filed that shall, at a minimum, remove the 166.6-acre County owned land from the SPECIFIC PLAN, identify an alternative regional park location within the SPECIFIC PLAN, revise the Land Use Plan to reflect the new park site, and revise all other aspects of the SPECIFIC PLAN to accommodate the new park site. Any revised CEQA documentation shall also be completed with the Specific Plan Amendment.

30.PLANNING. 3 MM - WASTE MGMT MOU (2) RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"Prior to the issuance of any grading permits within the Specific Plan boundaries, a clearance letter shall be obtained from the Riverside County Waste Management Department (RCWMD) indicating that the applicant is in substantial conformance with the terms of the Landfill MOU specified in condition of approval 30.PLANNING.2, to the satisfaction of RCWMD."

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN RECOMMND

The following policies and implementation measures comprise the Master Cultural Resources Plan for SP 375 - Travertine Point Specific Plan and any descendant or implementing projects within the specific plan boundaries.

Cultural Resources Policy 1:
To actively pursue a comprehensive survey program for the entire 4,918-acre project area to identify, document, and protect, if feasible, prehistoric and historical archaeological sites, and sites containing Native American human remains.

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) RECOMMND

Implementation Measure 1-1: the proposed Project would be covered under the CEQA Guidelines (California 2005) or Section 106 of the National Historic Preservation Act (NHPA), and shall be surveyed by a professional who is registered with the County of Riverside for those areas within Riverside County, and acceptable to Imperial County and/or the Bureau of Indian Affairs for those project areas under those jurisdictions, regarding archaeological activities and methods prior to the County's approval of proposed Project plans (48 CFR 44716-44742).

Implementation Measure 1-2: All archaeological site location data collected during the cultural resources surveys shall be considered to be of a sensitive nature and must remain confidential. Caution must be exercised when disseminating this information; in particular, maps and site location data should be made available only to managers, County officials, federal officials, and other professionals on a demonstrated need to know basis.

Implementation Measure 1-3: For potentially significant prehistoric archaeological resources or sites containing Native American human remains identified during the Project's archaeological surveys, the Project proponent, or their designee or successors, shall continue consultation with the Native American Heritge Commission (NAHC) in Sacramento and interested Native American individuals and organzations.

Cultural Resources Policy 2:
To avoid impacts to potentially significant prehistoric and historical archaeology resources and sites containing Native American human remains, where feasible.

Implementation Measure 2-1: If Cultural resources avoidance is feasible, potentailly significant archaeological resources and sites containing Native American human remains shall be placed within permanent Project-specific conservation easements or dedicated open space-conservation areas.

Implementation Measure 2-2: Where avoidance of archaeological resources and sites containing Native American human remains is not a feasible managment option, capping these resources with sterile sediments and avoidance planting (e.g. planting of cactus, mesquite, or

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

other Native plants) shall be considered the next most favorable management option. In doing so, capping the resource(s) will ensure that direct impacts from increased public availability to these sites are avoided.
Site CA-RIV-8895 (33-17086) deep sediments may contain intact subsurface cultural deposits below the zone of disturbance. If this site cannot be avoided during project development, Phase II Testing and Evaluation is required to ascertain site integrity, data potential, and significance.

Site CA-RIV-8896 (33-17087) - If this site cannot be avoided during project development, Phase II testing is required to ascertain site integrity, data potential, and significance.

Site CA-IMP-8784 (13-009821) - If this site cannot be avoided during project development, Phase II testing is required to ascertain site integrity, data potential, and significance, in accordance with the standards of Imperial County.

Site CA-IMP-8785 (13-009822) - If this site cannot be avoided during project development, Phase II testing is required to ascertain site integrity, data potential, and significance, in accordance with the standards of Imperial County.

Site CA-IMP-8786 (13-009823) - this site consists of several interconnecting segments of a prehistoric aboriginal trail system that may be part of the "Northwest Santa Rosa Trail". Consultation with the participating Native American tribes is required to complete a determination for significance. Pending that consultation, this site is determined to be significant, in accordance with teh standards of Imperial County.

Site CA-IMP-33 - Travertine Rock - This is a significant site and avoidance is strongly recommended, in accordance with the standards of Imperial County. This site shall be be formally nominated as a Traditional Cultural Property (TCP) and to the National Register of Historic Places, if it has not already been listed, in accordance with the standards of Imperial County.

Site CA-IMP-92 - This site shall be tested to ascertain

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30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

site integrity, data potential, and site signfiicance if it cannot be avoided during project development, in accordance with the standards of Imperial County.

Site CA-IMP-100 - This site shall be tested to ascertain site integrity, data potential, and site significance if it cannot be avoided during project development, in accordance with teh standards of Imperial County.

Site CA-IMP-2626 - If this site cannot be avoided during project development, Phase II Testing and Evaluation is recommended to ascertain site integrity, data potential, and significance, in accordance with the standards of Imperial County.

Site CA-RIV-1525 - This site contained the largest aggregate of fish traps yet found in the Coachella Valley, however much of the site was destroyed by agriculture and land clearing by the applicant. Extant portions of the site may be eligible for listing on the National Register of Historic Places, and further evaluation is required prior to any implementing project approval within the site area. Portions of the site located on the tribal lands of the Torres-Martinez Desert Cahuilla Indians should be preserved in perpetuity.

Cultural Resources Policy 3:
To reduce adverse impacts to significant archaeological resources that cannot be protected in place through data recovery excavations.

Implementation Measure 3-1: If avoidance and/or preservation in place of known prehistoric and historical archaeological resources is not a feasible management option, the Project proponent or his/her successors, shall ensure that potentially significant archaeological resource(s), and site(s) shall be investigated pursuant to the standards, guidelines, and principles of the Advisory Council's Treatment of Archaeological Properties: A Handbook (ACHP 1980), except where any existing policies or guidelines adopted by the County of Riverside, County of Imperial, and/or Bureau ofIndian Affairs differ.

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

Prior to the issuance of a Project-related grading permit, the Projects' proponent's consultant, registered with the County of Riverside and/or who meets the professional requirements of the County of Imperial or the Bureau of Indian Affairs, shall use the Project's Research Design detailed in Chapter 6 of the Phase I Cultural Resources report prepared by Applied Earthworks, dated April 2008, to guide the implementation of a Phase II Testing and Evaluation Program. In general terms, the Phase II Testing and Evaluation Program shall be designed to further define site boundaries and to assess the structure, content, nature, and depth of subsurface cultural deposits and features. Emphasis shall also be placed on assessing site integrity and the site's potential to address regional archaeological research questions. These data shall then be used to address the NRHP/CRHR eligibility requirements for the archaeological resource, and make recommendations as to the suitability of the resource for listing on either the national or state register of sites.

After approval of the Project's various cultural resources reports by the appropriate County and/or Bureau of Indian Affairs and prior to issuance of Project-related grading permits, the Project proponent's consultant shall complete the Phase II Testing Program as specified in the Project Phase II Testing and Evaluation Proposal and Research Design and prior to the issuance of a Project grading permit. The results of this Phase II Testing Program shall be presented in a technical report that follows the report requirements of the County of Riverside and/or the County of Imperial or the Bureau of Indian Affairs. The Phase II Report shall be submitted to the Lead Agency's Planning Department for review and comment and the Torres-Martinez Desert Cahuilla Indians prior to the issuance of a Project-related grading permit. If the resource is determined to be ineligible for listing on the NRHP/CRHR upon completion of the Phase II Testing Program, no further cultural resources management of this resource would be required.

Implementation Meausre 3-2: A participant-observer(s) from the Torres-Martinez Desert Cahuilla Indians shall be present during Phase II archaeological excavations involving all sites of Native American concern.

Implementation Measure 3-3: If the cultural resource is

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

identified as being potentially eligible for listing on wither NRHP and CRHR, and Project designs cannot be altered to avoid impacting the site, a Phase III Data Recovery Program to mitigate project effects shall be initiated. A Data Recovery Treatment plan detailing the objectives of the Phase III Program shall be developed and contain specific testable hypotheses pertinent to the project's Research Design and relative to the site(s) under study. The Phase III Data Recovery Treatment Plan shall be submitted to the County's Planning Department, the Torres-Martinez Desert Cahuilla Indians, if applicable, and the State Historic Preservation Office (SHPO) for review and comment prior to implementation of the Data Recovery program.

After Approval of the Treatment Plan, the Phase III Data Recovery Program for affected, eligible site(s) shall be completed. Typically, a Phase III Data Recovery Program involves the excavation of a statistically representative sample of the site(s) as being eligible for listing on the National Register of Historic Places of the California Register of Historic Resources. Again, participant-observer(s) from the Torres-Martinez Desert Cahuilla Indians shall be present during archaeological data-recovery excaations involving sites of Native American concern. At the conclusion of the Phase III Program, a Phase III Data Recovery Report shall be prepared, fulfilling the report requirements of the County of Riverside, County of Imperial, and/or the Bureau of Indian Affairs, as applicable. The Phase III Data Recovery Report shall be submitted to the County's Planning Department, the Torres-Martinez Desert Cahuilla Indians, if applicable, and the BIA and SHPO for review and comment prior to the issuance of a Project grading permit.

Implementation Measure 3-4: All arcaheological materials recovered during implementation of the Project's Phase II Testing or Phase III Data Recovery programs shall be processed, including cleaning and cataloguing, detailed description, and analyses, as appropriate. Following completion of laboratory and analytical procedures, all Project-related collections shall be suitably packaged and transferred to a curation facility that meets the standards of 36 CFR 79 for long-term storage. Materials to be curated include archaeological specimens and samples, field notes, feature and burial records, maps, plans, profile drawings,

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

photo logs, photographic negatives, consultant's reports of special studies, and copies of the final technical reports.

It should be noted that provisions of the Native American Graves Protection Repatriation Act (NAGPRA) pertaining to Native American burials, sacred objects, and objects of cultural patrimony would come into effect when archaeological materials are recovered from lands owned by the Torres-Martinez Desert Cahuilla Indians and managed by the BIA. As well, NAGPRA would also apply when ownership of the collections from anywhere within the Travertine Point Specific Plan study area transfer to a curation repository that received federal funding. Should the Torres-Martinez Band of Desert Cahuilla Indians request repatriation of cultural materials from non-federal lands within the Specific Plan, those materials shall be repatriated upon submittal of the Phase IV Archaeological Monitoring Report to the County Archaeologist. This report shall follow the report format posted on the TLMA website for Phase IV work.

Cultural Resources Policy 4:
To ensure proper identification and treatment of cultural resources discovered during Project development and construction.

Implementation Meaure 4-1: Registered professional archaeologists and culturally affiliated Native Americans, with knowledge in cultural resources, shall monitor all Project-related ground-disturbing activities that extend into natural sediments or other land forms in areas determined to have high archaeological sensitivity for prehistoric resources.

Prior to the County-permitted Project, the Project proponent shall include in their Mitigation Plan provisions for the identification and evaluation of archaeological resources inadvertantly discovered during construction. Thus, if buried archaeological resources are uncovered during construction, all work shall be halted in the vicinity of the archaeological discovery until a registered professional archaeologist can visit the site of discovery and evaluate the significance of the archaeological resource.

Implementation Measure 4-1a: Registered professional

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

archaeologists experienced in historical archaeological resources shall monitor all Project-related ground-disturbing activities that extend into natural sediments or other land forms in areas determined to have high archaeological sensitivity for historical resources.

Implementation Measure 4-2: If the archaeological resource is determined to be a potentially significant cultural resource, the Project proponent's Mitigation Plan shall include provisions for the preparation and implementation of a Phase III Data Recovery Program, as well as disposition of recovered artifacts, in accordance with Cultural Resource Policy 3, Implementation Measure 4, above.

Implementation Measure 4-3: In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery on privately-owned or State-owned land, the steps and procedures specified in Health and Safety Code Subsection 7050.5, State CEQA Guidelines 15064.5(d, and Public Resources Code Subsection 5097.98 shall be implemented. Specifically, in accordance with Public Resources Code Subsection 5097.98, the Riverside County Coroner shall be notified within 24 hours of the discovery of potentially human remains. The Coroner shall then detemine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with PRC Subsection 5097.98. The NAHC shall then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification.

The MLD shall then have the opportunity to recommend to the Project proponent means for treating or dispsoing with appropriate dignity, the human remains and associated grave goods wtihin 24 hours of notification. Whenever the NAHC is unable to identify an MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the MLC and the mediation provided for in subdivision (k) of the PRC SS 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

dignity on the property in a location not subject to further subsurface disturbance.

It should be noted that in the event that Native American human remains are inadvertantly discovered during the County-permitted, Project-related construction activitie, there would be unavoidable signfiicant adverse impacts to these resources. Implementation of the Cultural Resources Policies 1, 2 and 3 and their corresponding implmentation measures would, however, reduce impacts to other types of archaeological resources to a level that is less than significant.

Implementation Measure 4-4: The treatment and management of potential Traditional Cultural Properties (TCPs) identified with the Travertine Point Specific Plan study area shall be conducted through extensive consultation with concerned Native American groups and organzations. These consultation efforts shall be conducted utilizing the County of Riverside's SB 18 consultation process, or those employed by the County of Imperial, as appropriate.

Cultural Resources Policy 5:
To ensure that the Project proponent shall bear all costs associated with cultural resources management within the County's jurisdiction.
Implementation Measure 5-1: The Project proponent shall bear all expenses realted to the identification, evaluation, and treatment of cultural resources directly or indirectly affected by Project-related construction activity. Such expenses may include, pre-field planning, field work, post field analyses, research, interim and summary report preparation, and final report production (including draft and final versions), and costs associated with the curation of project documentation and the associated artifact collections.

Implementation Measure 5-2: On behalf of the County and the Project proponent, the final technical reports detailing the results of the Phase II Testing or Phase III Data Recovery programs shall be submitted to the appropriate Archaeological Information Centers of the California Historical Resources Inventory System for their information and where they would be available to other researchers. As well, final Phase III Data Recovery Reports shall be submitted to local libraries, schools, participating

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30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.)RECOMMND

tribes, and historical societies to enable the general public to learn about their local cultural heritage.

Implementation Measure 5-3: Phase IV Archaeological Monitoring Reports shall be submitted prior to final inspection for each permitted project within the specific plan. Every grading permit subject to archaeological monitoring shall result in a Phase IV report submitted to the County Archaeologist and/or BIA.

Cultural Resources Policy 6- Directives for specific cultural resources sites known as of September 18, 2008, pursuant to the recommendations from the Phase I Cultural Resources report prepared for this specific plan by Applied Earthworks, April 2008:

Site AE-TRV-1H - preliminary significance evalution determines that this site is potentially significant resource as it has been an important source of fresh water to enable the settlement and agricultural development of this portion of the Coachella Valley for the past 70 years.

Site CA-RIV-8891 (33017082) - if this site cannot be avoided during project development, Phase II Testing and Evaluation is recommended to ascertain site integrity, data potential, and significance.

Site CA-RIV-8892/H (33-17083) - The data potential was realized during site recordation and archival resarch, therefore no further management of this resource is recommended.

Site CA-RIV-8893/H (33-17084) - The data potential was realized during recordation and archival research, therefore no further management of this resource is recommended.

Site CA-RIV-8894 (33-17085) - The site is located within an alluvial, depositional environment with undetermined soil depth, and there is some potential for intact subsurface cultural deposits beneath the zone of mechanical distrubance. If this site cannot be avoided during the project development, Phase II Testing and Evaluation is recommended to ascertain site integrity, data potential, and significance.

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 4 SP - MASTER CULTURAL RES PLAN (cont.) (cont.) RECOMMND

Site CA-RIV-8895 (33-17086) deep sediments may contain intact subsurface cultural deposits below the zone of disturbance. If this site cannot be avoided during project development, Phase II Testing and Evaluation is required to ascertain site integrity (33-17086) - The potentially s

30.PLANNING. 7 SP - GEOLOGIC STUDY RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project and satisified prior to scheduling that project for public hearing:

"PRIOR TO SCHEDULING THIS PROJECT FOR A PUBLIC HEARING/ACTION, THE FOLLOWING SPECIAL GEOLOGIC STUDIES SHALL BE SUBMITTED TO AND APPROVED BY THE COUNTY GEOLOGIST:

A geologic/geotechnical investigation report. The investigation shall address geologic hazards including, but not necessarily limited to, slope stability, rock fall hazards, landslide hazards, surface fault rupture, fissures, liquefaction potential, collapsible and/or expansive soils, subsidence, wind and water erosion, debris flows, and groundshaking potential. For completeness and direct correlation to the proposed project, the consultant shall be provided the most recent copy of the project case exhibit (tract map, parcel map, plot plan, CUP, etc.) for incorporation into the consultant's report. Furthermore, the consultant shall plot all appropriate geologic and geotechnical data on this case exhibit and include it as an appendix/figure/plate in their report. The geologic/geotechnical investigation report shall be reviewed and approved by the County Engineering Geologist prior to scheduling this case for a public hearing.

Note: acquisition of a County geologic report (GEO) number and submittal of review fees is required (DBF to be determined). All reports (2 wet-signed original copies), Planning Geologic Report application (case sub-type GEO3) and deposit base fee payment should be submitted, in person by the applicant or his/her representative, at one of the County's two main offices (Riverside, Palm Desert). These items should be submitted at the Land Use counter. Reports and payment should not be given to the Planner or County Geologist directly.

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 7 SP - GEOLOGIC STUDY (cont.) RECOMMND

The applicant and their consultant should also be aware that County Ordinance 457.98 requires a grading permit for any exploratory excavations consisting of 1000 cubic yards or greater in any one location of one acre or more. This applies to all trenching, borings and any access road clearing/construction that may be necessary."

30.PLANNING. 8 SP - M/M PROGRAM (GENERAL) RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"The EIR prepared for the SPECIFIC PLAN imposes specific mitigation measures and monitoring requirements on the project. Certain conditions of the SPECIFIC PLAN and this implementing project constitute reporting/monitoring requirements for certain mitigation measures."

30.PLANNING. 12 SP - PROJECT LOCATION EXHIBIT RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"The applicant shall provide to the Planning Department an 8 1/2" x 11" exhibit showing where in the SPECIFIC PLAN this project is located. The exhibit shall also show all prior implementing projects within the SPECIFIC PLAN that have already been approved.

This condition shall be considered MET once the applicant provides the Planning Department with the required information. This condition may not be DEFERRED."

30.PLANNING. 19 SP - EA REQUIRED RECOMMND

Prior to the approval of any implementation project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

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30.PLANNING. 19 SP - EA REQUIRED (cont.) RECOMMND

"If this implementing project is subject to the California Environmental Quality Act (CEQA), an environmental assessment shall be filed and processed concurrently with this implementing project. At a minimum, the environmental assessment shall utilize the evaluation of impacts addressed in the EIR prepared for the SPECIFIC PLAN.

This condition shall be considered as MET if an environmental assessment was conducted for this implementing project. This condition may be considered as NOT APPLICABLE if this implementing project is not subject to CEQA. This condition may not be DEFERRED."

30.PLANNING. 20 SP *- ADDENDUM EIR RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"This implementing project has been reviewed in the context the EIR, which is associated with this SPECIFIC PLAN. The Planning Department has reviewed this project and its relationship to the EIR, and has found that no new environmental impacts have arisen since the certification of the EIR. Although the EIR adequately addressed the environmental impacts of the SPECIFIC PLAN as a whole, more detailed technical informaiton (i.e. traffic studies, updated biological studies, etc.) have been required by the Planning Department and/or other COUNTY land development review departments in order to complete its environmental review. Therefore, an ADDENDUM to the previously certified EIR has been prepared in conjunction with this implementing application.

This condition shall be considered MET if an ADDENDUM to the EIR has been prepared. Alternatively, this condition shall be considered as NOT APPLICABLE if an ADDENDUM to the EIR is not required."

30.PLANNING. 21 SP *- SUPPLEMENT TO EIR RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 21 SP *- SUPPLEMENT TO EIR (cont.) RECOMMND

"This implementing project has been reviewed in the context the EIR, which is associated with this SPECIFIC PLAN. The Planning Department has reviewed this project and its relationship to the EIR, and has found that although the EIR adequately addressed the environmental impacts of the SPECIFIC PLAN at the time, new environmental impacts have arisen since the certification of the original EIR. The Planning Department has determined that the new environmental impacts can be mitigated to below a level of significance. Therefore, a SUPPLEMENT to the previously certified EIR has been prepared in conjunction with this implementing application.

This condition shall be considered MET if a SUPPLEMENT to the EIR has been prepared. Alternatively, this condition shall be considered as NOT APPLICABLE if a SUPPLEMENT to the EIR is not required."

30.PLANNING. 22 SP *- SUBSEQUENT EIR RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"This implementing project has been reviewed in the context the EIR, which is associated with this SPECIFIC PLAN. The Planning Department has reviewed this project and its relationship to the EIR, and has found that although the EIR adequately addressed the environmental impacts of the SPECIFIC PLAN at the time, new environmental impacts have arisen since the certification of the original EIR. The Planning Department has determined that this implementing project may have a signficant impact to the new environmental impacts that have arisen. Therefore, a SUBSEQUENT EIR has been prepared in conjunction with this implementing application.

This condition shall be considered MET if a SUBSEQUENT EIR has been prepared. Alternatively, this condition shall be considered as NOT APPLICABLE if a SUBSEQUENT to the EIR is not required."

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 23 SP - COMPLETE CASE APPROVALS RECOMMND

Prior to the approval of any implementing project (tract map, parcel map, use permit, plot plan, etc.) the SPECIFIC PLAN, the GPA, the CHANGE OF ZONE, and the EIR must have been approved, adopted, and certified by the Board of Supervisors, respectively.

This condition shall be considered as MET once the SPECIFIC PLAN, the GPA, the CHANGE OF ZONE, and the EIR have been approved, adopted, and certified by the Board of Supervisors, repectively. This condition may not be DEFERRED.

30.PLANNING. 24 SP - AMENDMENT REQUIRED RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"If this implementing project meets any of the following criteria, an amendment to the SPECIFIC PLAN shall be required and processed concurrently with this implementing project:

1. The implementing project adds any area to, or deletes area from, the SPECIFIC PLAN;

2. The implementing project proposes a substantially different use than currently allowed in the SPECIFIC PLAN (i.e. proposing a residential use within a commercially designated area); or

3. as determined by the Planning Director.

Any amendment to the SPECIFIC PLAN, even though it may affect only one portion of the SPECIFIC PLAN, shall be accompanied by a complete specific plan document which includes the entire specific plan, including both changed and unchanged parts.

This condition shall be considered MET if the specific plan amendment has been filed, and NOT APPLICABLE if a specific plan amendment is determined to be unnecessary."

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 25 SP - PARK AGENCY REQUIRED RECOMMND

Prior to the approval of any implementing land division project within the SPECIFIC PLAN (i.e. tract map, or parcel map), the following condition shall be placed on the implementing project:

"PRIOR TO MAP RECORDATION of any subdivision, or other residential development application, all portions of this implementing project not currently within the boundaries of the Desert Recreation District (DRD), shall be annexed into the DRD or a similar entity such as a County Service Area/District that has been designated by the Board of Supervisors, pursuant to Section 10.35(G) of Ordinance No. 460, to receive park dedications and fees. Documentation of said annexation shall be provided to the Planning Department.

This condition shall be considered as NOT APPLICABLE if the DRD, or simmilar entity, is unwilling or unable to annex the property in question."

30.PLANNING. 26 SP - AG/DAIRY NOTIFICATION RECOMMND

Prior to the approval of any implementing residential land division within the SPECIFIC PLAN, and within one half mile of existing agricltural uses, the following condition of approval shall be applied to the implementing project stating that:

"PRIOR TO MAP RECORDATION, the applicant shall submit a detailed proposal for the notification of all initial and future purchasers of dwelling units within the subject project of the existence of dairies and/or other agricultural uses within one half mile of the subject property (both within and external to the SPECIFIC PLAN) and potential impacts resulting from those uses. Said notification shall be in addition to any notice required by Ordinance No. 625 (Riverside County Right-to-Farm Ordinance). Said approved notification shall be provided to all initial and all future purchasers of dwelling units within the subject project as long as proximal agricultural uses continue."

30.PLANNING. 27 SP *- PA PROCEDURES RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map or parcel map), the

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 27 SP *- PA PROCEDURES (cont.) RECOMMND

following condition shall be placed on the implementing project PRIOR TO MAP RECORDATION in the case of land division applications (tentative parcel maps or tentative tract maps) or PRIOR TO BUILDING PERMITS in the case of use permit applications (plot plans, conditional use permits, or public use permits):

"The planning area[s] for which this land division application is located must be legally defined. Any of the following procedures may be used in order to legally define this [these] planning area[s]:

1. The project proponent has processed a FINAL CHANGE OF ZONE MAP concurrent with the SPECIFIC PLAN which legally defined this [these] planning area[s].
2. The project proponent shall file a change of zone application along with a legal description defining the boundaries of the planning area affected by this land division application. The applicant will not be changing the allowed uses or standards within the existing zone but will merely be providing an accurate legal description of the affected planning area. The change of zone shall be approved and adopted by the Board of Supervisors."

30.PLANNING. 28 SP *- CC&R RES PUB COMMON AREA RECOMMND

Prior to the approval of any implementing land division project (i.e. tract map or parcel map), the following condition shall be applied to the land division PRIOR TO MAP RECORDATION if the permanent master maintenance organization referenced in the condition entitled "SP - Common Area Maintenance" is a public organization:

"The applicant shall convey to the County fee simple title, to all common open space areas, free and clear of all liens, taxes, assessments, leases (recorded or unrecorded) and easement, except those easements which in the sole discretion of the County are acceptable. As a condition precedent to the County accepting title to such areas, the applicant shall notify the Planning Department that the following documents shall be submitted to the Office of the County Counsel and submit said documents for review along with the current fee, which shall be subject to County Counsel approval:

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 28 SP *- CC&R RES PUB COMMON AREA (cont.) RECOMMND

1. A cover letter identifying the project for which approval is sought;

2. A signed and notarized declaration of covenants, conditions and restrictions;

3. A sample document, conveying title to the purchaser, of an individual lot or unit which provides that the declaration of covenants, conditions and restrictions is incorporated therein by reference; and,

4. A deposit equaling three (3) hours of the current hourly fee for Review of Covenants, Conditions and Restrictions established pursuant to County Ordinance No. 671 at the time the above referenced documents are submitted for County Counsel review.

The declaration of covenants, conditions and restrictions submitted for review shall a) provide for a minimum term of 60 years, b) provide for the establishment of a property owners' association comprised of the owners of each individual lot or unit as tenants in common, and c) contain the following provisions verbatim:

"Notwithstanding any provision in this Declaration to the contrary, the following provisions shall apply:

The property owners' association established herein shall, if dormant, be activated, by incorporation or otherwise, at the request of the County of Riverside, and the property owners' association shall unconditionally accept from the County of Riverside, upon the County's demand, title to all or any part of the 'common area', more particularly described on Exhibit '___' attached hereto. Such acceptance shall be through the president of the property owner's association, who shall be authorized to execute any documents required to facilitate transfer of the 'common area'. The decision to require activation of the property owners' association and the decision to require that the association unconditionally accept title to the 'common area' shall be at the sole discretion of the County of Riverside.

In the event that the 'common area', or any part thereof, is conveyed to the property owners' association, the association, thereafter, shall own such 'common area',

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 28 SP *- CC&R RES PUB COMMON AREA (cont.) (cont.RECOMMND

shall manage and continuously maintain such 'common area', and shall not sell or transfer such 'common area' or any part thereof, absent the prior written consent of the Planning Director of the County of Riverside or the County's successor-in-interest. The property owners' association shall have the right to assess the owner of each individual lot or unit for the reasonable cost of maintaining such 'common area', and shall have the right to lien the property of any such owner who defaults in the payment of a maintenance assessment. An assessment lien, once created, shall be prior to all other liens recorded subsequent to the notice of assessment or other document creating the assessment lien.

This declaration shall not be terminated, 'substantially' amended, or property deannexed therefrom absent the prior written consent of the Planning Director of the County of Riverside or the County's successor-in-interest. A proposed amendment shall be considered 'substantial' if it affects the extent, usage or maintenance of the 'common area' established pursuant to this Declaration.

In the event of any conflict between this Declaration and the Articles of Incorporation, the Bylaws, or the property owners' association Rules and Regulations, if any, this Declaration shall control."

Once approved by the Office of County Counsel, the declaration of covenants, conditions and restrictions shall be recorded by the Planning Department with one copy retained for the case file, and one copy provided to the County Transportation Department - Survey Division."

30.PLANNING. 29 SP *- CC&R RES PRI COMMON AREA RECOMMND

Prior to the approval of any implementing land division project within the SPECIFIC PLAN (tract map or parcel map), the following condition shall be placed on the implementing project PRIOR TO MAP RECORDATION if the permanent master maintenance organization referenced in the condition entitled "SP - Common Area Maintenance" is a private organization:

"The applicant shall notify the Planning Department that the following documents shall be submitted to the Office of

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 29 SP *- CC&R RES PRI COMMON AREA (cont.) RECOMMND

County Counsel and submit said documents for review along with the current fee, which shall be subject to County Counsel approval:

1. A cover letter identifying the project for which approval is sought;

2. A signed and notarized declaration of covenants, conditions and restrictions;

3. A sample document, conveying title to the purchaser of an individual lot or unit, which provides that the declaration of covenants, conditions and restrictions is incorporated therein by reference; and,

4. A deposit equaling three (3) hours of the current hourly fee for Review if Covenants, Conditions and Restrictions established pursuant to County Ordinance No. 671 at the time the above referenced documents are submitted for County Counsel review.

The declaration of covenants, conditions and restrictions submitted for review shall a) provide for a minimum term of 60 years, b) provide for the establishment of a property owners' association comprised of the owners of each individual lot or unit as tenants in common, c) provide for ownership of the common area by either the property owners' association or the owners of each individual lot or unit as tenants in common, and (d) contain the following provisions verbatim:

"Notwithstanding, any provision in this Declaration to the contrary, the following provisions shall apply:

The property owners' association established herein shall manage and continuously maintain the 'common area', more particularly described on Exhibit '___', attached hereto, and shall not sell or transfer the 'common area' or any part thereof, absent the prior written consent of the Planning Director of the County of Riverside or the County's successor-in-interest.

The property owners' association shall have the right to assess the owners of each individual lot or unit for the reasonable cost of maintaining such 'common area' and shall have the right to lien the property of any such owner who

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 29 SP *- CC&R RES PRI COMMON AREA (cont.) (cont.RECOMMND

defaults in the payment of a maintenance assessment. An assessment lien, once created, shall be prior to all other liens recorded subsequent to the notice of assessment or other document creating the assessment lien.

This Declaration shall not be terminated, 'substantially' amended, or property deannexed therefrom absent the prior written consent of the Planning Director of the County of Riverside or the County's successor-in-interest. A proposed amendment shall be considered 'substantial' if it affects the extent, usage or maintenance of the 'common area' established pursuant to this Declaration.

In the event of any conflict between this Declaration and the Articles of Incorporation, the Bylaws, or the property owners' association Rules and Regulations, if any, this Declaration shall control."

Once approved by the Office of County Counsel, the declaration of covenants, conditions and restrictions shall be recorded the Planning Department with one copy retained for the case file, and one copy provided to the County Transportation Department - Survey Division."

30.PLANNING. 31 SP - PALEO M/M PROGRAM RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMITS, the project applicant shall enter into an agreement with a qualified paleontologist. This agreement shall include, but not be limited to, the preliminary mitigation and monitoring procedures to be implemented during the process of grading. A copy of said agreement shall be submitted to the Planning Department. No grading permits will be issued unless the preliminary mitigation and monitoring procedures as described in the EIR are substantially complied with."

30.PLANNING. 32 SP - GENERIC M/M PROGRAM RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit,

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30.PLANNING. 32 SP - GENERIC M/M PROGRAM (cont.) RECOMMND

plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMITS, the project applicant shall provide to the Planning Department a detailed proposal for complying with the preliminary mitigation and monitoring procedures described in the EIR for the process of grading. Grading permits will not be issued unless the preliminary mitigation and monitoring procedures as described in the EIR are substantially complied with."

30.PLANNING. 33 SP - F&G CLEARANCE RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e. tract map, parcel map, use permit, plot plan, etc.) which may propose grading or construciton within or along the banks of any blue-lined stream, the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMITS, the applicant shall obtain written notification to the County Planning Department that the appropriate California Department of Fish and Game notification pursuant to Sections 1601/1603 of the California Fish and Game Code has taken place, or obtain an "Agreement Regarding Proposed Stream or Lake Alteration" (Sections 1601/1603 Permit) should any grading or construction be proposed within or along the banks of any natural watercourse or wetland, located either on-site or any required off-site improvement areas. Copies of any agreement shall be submitted with the notification."

30.PLANNING. 34 SP - ACOE CLEARANCE RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e. tract map, parcel map, use permit, plot plan, etc.) which may propose grading or construciton within or along the banks of any blue-lined stream which is determined to be within the jurisdiction of the United States Army Corps of Engineers, the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMITS, the applicant shall obtain written notification to the County Planning Department that the alteration of any watercourse or

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30.PLANNING. 34 SP - ACOE CLEARANCE (cont.) RECOMMND

wetland, located either on-site or on any required off-site improvement areas, complies with the U.S. Army Corps of Engineers Nationwide Permit Conditions, or obtain a permit under Section 404 of the Clean Water Act should any grading or construction be proposed within or along the banks of any natural watercourse or wetland. Copies of any agreement shall be submitted with the notification."

30.PLANNING. 36 SP - POST GRADING REPORT RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMITS, the project applicant shall provide to the Planning Department a post grading report. The report shall describe how the mitigation and monitoring program as described in the EIR and pre-grading agreement with the qualified archaeologist/paleontologist/other were complied with."

30.PLANNING. 37 SP - SCHOOL MITIGATION RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO BUILDING PERMITS, impacts to the Coachella Valley Unified School District shall be mitigated in accordance with state law."

30.PLANNING. 38 SP - ARCHAEOLOGIST RETAINED RECOMMND

Prior to the approval of any land division or development permit (use permit, plot plan, etc.), a condiiton of approval shall be applied to the land division or development permit to ensure that the unique archaeologic resources identified in the Cultural Resources Report prepared as part of this Specific Plan's environmental documentation have been adequately addressed. The condition shall read as follows:

Prior to the issuance of grading permits, a qualified archaeologist shall be retained by the land divider for

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 38 SP - ARCHAEOLOGIST RETAINED (cont.) RECOMMND

consultation and comment on the proposed grading with respect to potential impacts to unique archaeological resources. Should the archaeologist, after consultation with the appropriate Native American tribe, find the potential is high for impact to unique archaeological resources (cultural resources and sacred sites), a pre-grading meeting between the archaeologist, a Native American observer, and the excavation and grading contractor shall take place. During grading operations, when deemed necessary in the professional opinion of the retained archaeologist (and/or as determined by the Planning Director), the archaeologist, the archaeologist's on-site representative(s) and the Native American Observer shall actively monitor all project related grading and construction and shall have the authority to temporarily divert, redirect, or halt grading activity to allow recovery of unique archaeological resources. Prior to the issuance of grading permits, the NAME, ADDRESS and TELEPHONE NUMBER of the retained archaeologist shall be submitted to the Planning Department and the B&S Grading Division. If the retained archaeologist, after consultation with the appropriate Native American tribe, finds no potential for impacts to unique archaeological resources, a letter shall be submitted to the Planning Department certifying this finding by the retained qualified archaeologist.

30.PLANNING. 39 SP - IF HUMAN REMAINS FOUND RECOMMND

Prior to the approval of any land division or development permit (use permit, plot plan, etc.), a condition of approval shall be applied to the land division or development permit, and shall read as follows:

If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resource Code section 5097.98. The County Coroner shall be notified of the find immediately. If the remains are determined to be prehistoric, the coroner shall notify the Native American Heritage Commission, which will determine and notify the appropriate NATIVE AMERICAN TRIBE who is the most likely descendent. The descendent shall inspect the site of the discovery and make a recommendation as to the appropriate mitigation. After the recommendations have

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30.PLANNING. 39 SP - IF HUMAN REMAINS FOUND (cont.) RECOMMND

been made, the land divider, a Native American Tribe representative, and a County representative shall meet to determine the appropriate mitigation measures and corrective actions to be implemented.

30.PLANNING. 40 SP - COMMON AREA MAINTENANCE RECOMMND

Prior to the approval of any implementing land division project within the SPECIFIC PLAN (i.e. tract map or parcel map), the following condition shall be placed on the implementing application:

"PRIOR TO MAP RECORDATION, the following procedures for common area maintenance procedures shall be complied with:

a. A permanent master maintenance organization shall be established for the SPECIFIC PLAN area to assume ownership and maintenance responsibility for all common recreation, open space, circulation systems and landscaped areas. The organization may be public or private. Merger with an area-wide or regional organization shall satisfy this condition provided that such organization is legally and financially capable of assuming the responsibilities for ownership and maintenance. If the organization is a private association then neighborhood associations shall be established for each residential development, where required, and such associations may assume ownership and maintenance responsibility for neighborhood common areas.

b. Unless otherwise provided for in these conditions of approval, common open areas shall be conveyed to the maintenance organization as implementing development is approved or any subdivision as recorded.

c. The maintenance organization shall be established prior to or concurrent with the recordation of the first land division. Any agreements with the maintenance organization shall stipulate that maintenance of landscaped areas will occur in accordance with Ordinance No. 859 (as adopted and any amendments thereto) and the Riverside Guide to California Friendly Landscaping.

d. Covenants, Conditions, and Restrictions for the SPECIFIC PLAN shall prohibit the use of water-intensive landscaping and require the use of low water use landscaping pursuant to the provisions of Ordinance No.

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30.PLANNING. 40 SP - COMMON AREA MAINTENANCE (cont.) RECOMMND

859 (as adopted and any amendments thereto).

e. Covenants, Conditions, and Restrictions for the SPECIFIC PLAN shall incorporate provisions concerning landscape irrigation system management and maintenance for the purpose of facilitating the water-efficient landscaping requirements of Ordinance No. 859 (as adopted and any amendments thereto). The common areas to be maintained by the master maintenance organization shall be identified in the DISTRICT REFINMENT PLAN'S"

30.PLANNING. 41 SP - ENTRY MONUMENTATION RECOMMND

All monumentation shall be in substantial conformance to the DISTRICT REFINMENT PLAN for the respective DISTRICT of the SPECIFIC PLAN.

Landscaping of entry monument(s) shall comply with Ordinance No. 859 (as adopted and any amendments thereto) and the Riverside County Guide to California Friendly Landscaping."

30.PLANNING. 45 SP - CVWD CLEARANCE RECOMMND

The Coachella Valley Water District (CVWD) has indicated a conceptual approval of the Specific Plan design and related studies in a letter provided to the Planning Department on October 22, 2010. The following conditions of approval were requested in said letter. Prior to approval of any implementing project, the project proponent shall provide a clearance letter from CVWD to the Planning Department indicating that the following requirements have been met to the satisfaction of CVWD:

1. Flood risks from two drainage areas and potential flows from the Un-named Canyon South of Barton Canyon-Fan 6 and Barton Canyon-Fan 5 were not identified in the Report as a flood hazard that impact the development at the northwestern and north boundaries (Pierce Street and Avenue 80). The two drainage areas contribute approximately 1,200 - 2,000 cfs per square mile. The flows from the two drainage areas along with potential flows from Un-named Canyon-Fan 6 and Barton Canyon-Fan 5 will need to be determined and facilities constructed to collect, route and discharge the flows in a manner compatible with pre-project/existing conditions. These flood risks are

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30.PLANNING. 45 SP - CVWD CLEARANCE (cont.) RECOMMND

identified on the Exhibit.

2. The proposed flood control scheme will need to adequately address potential upstream and downstream impacts, as summarized below:

a. Channel 4 collects flow from a fan surface and discharges 3,490 cfs of concentrated flow into a culvert at HWY 86 where there are no downstream improvements. The discharge from Channel 4 must be released in a manner consistent with pre- project/existing conditions, which will require future analysis to define these conditions. Altematively, the developer can store or discharge flows within the boundaries of the northem portion of the development or obtain flooding easements from northem adjacent property owners.

b. The existing flood hazard analysis shows depths of 1 to 2 feet and velocities of 6 to 7 feet per second (fps) near the upstream (southwesterly) boundary of the development. The flood control concept plans show velocities that exceed 15 fps and depths of over 2 feet in the proposed channels. It is our view that the proposed depths and velocities will rapidly erode their proposed (natural bottom) flood channels and erosion may extend upstream of the development boundary. Future detailed analyses will be required to demonstrate that the channels remain stable, maintain their flood conveyance capacity and do not alter properties upstream of the development. Engineering solutions may include wider or concrete lined flood control channels.

c. The flood control scheme proposes to excavate flood basins and sediment traps and construct diversion channels to route flows from Channel 1, 2 and 3 through existing culverts within HWY 86's right-of-way. It is not known if Caltrans will permit the developer to build these facilities and we are not yet convinced that routing the peak flows through the existing culverts is a practical solution to flood management. Future detailed analysis will be required and engineering solutions may require improved or new culverts/bridges under HWY 86.

d. The developer will be required to obtain tentative approval from Caltrans for use and/or improvements within their right-of-way.

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30.PLANNING. 45 SP - CVWD CLEARANCE (cont.) (cont.) RECOMMND

e. The flood control scheme has three channels that discharge concentrated flows of 840 cfs, 34,039 cfs and 11,306 cfs into the Salton Sea. No analysis has been provided to demonstrate these discharges are reasonably similar to pre-project conditions. As well, potential impacts from sediment deposition and the Sea's receding shoreline on downstream properties have not been addressed. Future detailed analysis will be required that demonstrates the issues above have been addressed; such an analysis may result in changes to the conceptual designs of Channels 1, 2 and 3.

f. The flood control scheme proposes flood basins and sediment traps to the east of HWY 86 as part of protecting the development. These basins will capture sediment transported from the Santa Rosa Mountains and also capture sediments eroded from the flood control channels. Future detailed analyses will be required to predict the volumes of sediment that might be transported and trapped to ensure that the flood control scheme will function under these predicted volumes and develop a practical sediment management program.

3. A future detailed document that discusses the management, operations, and maintenance of the flood control system will also be required.

The development proposes to use for flood control several CVWD irrigation drainage channels that discharge into the Salton Sea. Coachella Valley drainage channels have existing beneficial uses that include preservation of rare, threatened or endangered species. Please note that the Conditional Letter of Map Revision (CLOMR) process as of October 1, 2010, requires compliance with the Endangered Species Act (ESA). ESA compliance documentation is required prior to submitting the CLOMR to FEMA. Because of the recent change, CVWD may require that the developer obtain a CLOMR prior to approval of Tentative Map.

The Salton Sea is designated as Waters of the United States; the developer will be required to obtain permission and/or permits for the construction of the channels at the Salton Sea from the Army Corps of Engineers, the Environment Protection Agency (EPA) and the Regional Water Quality Control Board.

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30.PLANNING. 45 SP - CVWD CLEARANCE (cont.) (cont.) (cont.) RECOMMND

The developer is urged to begin consultation with U.S. Department of Interior's Fish and Wildlife Service, California Department of Fish and Game, Army Corps of Engineers and other environmental agencies regarding the flood control scheme to minimize any potential future impacts/changes to the flood control scheme.

CVWD requests the county require the developer to update the pertinent sections of Specific Plan 375 and the EIR documentation to include the above conditions as part of the flood control scheme concept approval. Also, CVWD requests to reserve the right to comment on the flood control scheme in the event modifications are made during the finalization of the Specific Plan & EIR documentation.

30.PLANNING. 46 SP - MITIG MEASURE 6.1-4 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.1-4 from EIR514 requires:

Prior to grading final, the project applicant shall develop a lighting plan to reduce off-site and nighttime lighting impacts that shall be subject to approval by the Riverside Planning Department. The plan shall require all lighting adjacent to open space areas to be downcast luminaries with light patterns directed away from and shielded so that light is not directed into open space areas. Mercury vapor and halide lighting shall not be used on the perimeter of the developed areas and in areas adjacent to undeveloped open space. Security lighting throughout the project shall be controlled to limit light shine to necessary periods."

30.PLANNING. 47 SP - MITIG MEASURE 6.3-1 RECOMMND

Mitigation Measure 6.3-1 from EIR514 requires:

Prior to implementing project approval, applicants for

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 47 SP - MITIG MEASURE 6.3-1 (cont.) RECOMMND

implementing projects shall develop a Construction Traffic Emission Management Plan to minimize emissions from vehicles including, but not limited to, scheduling truck deliveries to avoid peak hour traffic conditions, consolidating truck deliveries, and prohibiting truck idling in excess of 5 minutes.

30.PLANNING. 48 SP - MITIG MEASURE 6.3-2 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-2 from EIR514 requires:

Prior to grading permit issuance, applicants for implementing projects shall develop a Construction Emission Management Plan to minimize construction-related emissions. The Construction Emission Management Plan shall include, at a minimum, the following elements:

-Use of water trucks or sprinkler system in sufficient quantities to prevent airborne dust from leaving the site. When wind speeds exceed 15 miles per hour the operators shall increase watering frequency.

-Suspend grading and excavation activities during windy periods (i.e., surface winds in excess of 20 miles per hour).

-Suspend the use of all construction equipment during first-stage smog alerts.

-Active sites shall be watered at least three times daily during dry weather.

-Increase watering frequency during construction or use non-toxic chemical stabilizers if it would provide higher control efficiencies.

-Application of non-toxic chemical soil stabilizers or

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 48 SP - MITIG MEASURE 6.3-2 (cont.) RECOMMND

apply water to form and maintain a crust on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days) or plant vegetative ground cover as soon as possible.

-Application of non-toxic binders to exposed areas after cut and fill operations and hydroseeded areas.

-Cover or application of water or non-toxic chemical suppressants to form and maintain a crust on inactive storage piles.

-Retrofit large off-road construction equipment that will be operating for significant periods. Retrofit technologies such as particulate traps, selective catalytic reduction, oxidation catalysts, air enhancement technologies, etc., shall be evaluated. These technologies will be required if they are certified by CARB and/or the US EPA, and are commercially available and can feasibly be retrofitted onto construction equipment.

-The project applicant shall require all on-site construction equipment to meet US EPA Tier 4 or higher emissions standards according to the following:

-Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentations, and CARB, SCAQMD, or ICAPCD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

-Designate personnel to monitor dust control measures to ensure effectiveness in minimizing fugitive dust emissions.

-An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 48 SP - MITIG MEASURE 6.3-2 (cont.) (cont.) RECOMMND

to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

"The contractor shall utilize low-VOC content coatings and solvents that are consistent with applicable SCAQMD and ICAPCD rules and regulations.

Consideration shall be given to use of other transportation methods to deliver materials to the construction sites (for example, trains or conveyors) if it would result in a reduction of criteria pollutant emissions."

30.PLANNING. 49 SP - MITIG MEASURE 6.3-3 RECOMMND

Mitigation Measure 6.3-3 from EIR514 requires:

Prior to implementing project approval, applicants for implementing projects located in areas under the jurisdiction of the SCAQMD shall be required to conduct a project-level Localized Significance Thresholds (LST) analysis in accordance with the SCAQMD Final Localized Significance Thresholds Methodology or any superseding guidance document adopted by the SCAQMD Governing Board (South Coast Air Quality Management District, Final Localized Significance Threshold Methodology (2008). The guidance document may be viewed at the following website: http://www.aqmd.gov/ceqa/handbook/lst/lst.html.).

30.PLANNING. 50 SP - MITIG MEASURE 6.3-4 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-4 from EIR514 requires:

Prior to building final inspection, the applicant shall submit building plans to the County Building Department to demonstrate that all residential buildings are designed to achieve energy efficiency equivalent to levels 30 percent

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30.PLANNING. 50 SP - MITIG MEASURE 6.3-4 (cont.) RECOMMND

better than the current standards required by Title 24 (2008) Standards at the time building permits are issued."

30.PLANNING. 51 SP - MITIG MEASURE 6.3-5 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-5 from EIR514 requires:

Prior to building final inspection, the applicant shall submit building plans to the County Building Department to demonstrate that all commercial buildings shall be designed to achieve energy efficiency equivalent to levels 15 percent better than the current standards presently required by Title 24 (2008) Standards at the time building permits are issued."

30.PLANNING. 52 SP - MITIG MEASURE 6.3-6 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-6 from EIR514 requires:

Prior to building final inspection, the applicant shall provide preferential parking spaces for carpools and vanpools at major commercial and office locations. The spaces shall be clearly identified in plot plans and may not be pooled in one location. A minimum of 10 percent of parking spaces in excess of those required by County ordinance shall be reserved for carpool or vanpool parking."

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30.PLANNING. 54 SP - MITIG MEASURE 6.3-7 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-7 from EIR514 requires:

Prior to building final inspection, applicants shall post "5-minute idling" signs for trucks where applicable."

30.PLANNING. 55 SP - MITIG MEASURE 6.3-8 RECOMMND

Mitigation Measure 6.3-8 from EIR514 requires:

Prior to implementing project approval, applicants for implementing projects shall provide or make arrangements to provide shuttle service connecting the project's medium- and high-density development areas to existing transit service until such time that full transit service is provided to and within the project site.

30.PLANNING. 56 SP - MITIG MEASURE 6.3-10 RECOMMND

Mitigation Measure 6.3-10 from EIR514 requires:

Prior to implementing project approval, plans demonstrating that active parks, playgrounds, schools, and nursing/hospital facilities are to be located at least 500 feet from the closest right of way of State Route 86S shall be submitted to the County Planning Department for review and approval.

30.PLANNING. 57 SP - MITIG MEASURE 6.3-11 RECOMMND

Mitigation Measure 6.3-11 from EIR514 requires:

Prior to implementing project approval, plans demonstrating that residential units are to be located a minimum of 300 feet from the nearest right of way of State Route 86S to the lot line shall be submitted to the County Planning Department for review and approval.

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30.PLANNING. 58 SP - MITIG MEASURE 6.3-12 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-12 from EIR514 requires:

Prior to building final inspection, residential units located within 500 feet from the closest right of way of State Route 86S shall be equipped with high-efficiency electrostatic cleaning devices."

30.PLANNING. 59 SP - MITIG MEASURE 6.3-13 RECOMMND

Mitigation Measure 6.3-13 from EIR514 requires:

Prior to implementing project approval, residential units located within 500 feet from the closest right of way of State Route 86S shall be required to conduct a health risk assessment.

30.PLANNING. 60 SP - MITIG MEASURE 6.3-14 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.3-14 from EIR514 requires:

Prior to building final inspection, permit applicants shall provide to the County Planning Department a disclosure document form, to be provided to all future property owners (residential and commercial), disclosing that the property is in the Salton Sea Air Basin, which is an area designated as in nonattainment status by the U.S. EPA and California Air Resources Board (CARB) for particulate matter, including but not limited to PM10. The documentation shall

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 60 SP - MITIG MEASURE 6.3-14 (cont.) RECOMMND

note that periodic windblown dust and particulate matter from agricultural lands in Riverside, and exposed Salton Sea shoreline areas if sea levels recede further, may result in adverse respiratory health impacts. The disclosure form shall be provided to all future property owners within the Project site, after review and approval by the County Planning Department."

30.PLANNING. 61 SP - MITIG MEASURE 6.3-15 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.3-15 from EIR514 requires:

Prior to grading permit issuance, the construction contractor shall prepare a Work Plan for review and approval by County Building and Safety Department and County Department of Public Health that includes the following measures, where feasible, to reduce valley fever and Hantavirus risk during construction:

-For construction activity involving substantial soil disturbance activity, preferentially assign persons with positive coccidioidin skin tests (since those with positive tests can be considered immune to reinfection of valley fever) to perform the work.

-Hire crews from local populations when and where possible, since it is more likely that they have been previously exposed to the fungus (coccidioides immitis) and are therefore immune.

-Consult with staff from the Coachella Valley Mosquito and Vector Control District to ascertain whether the wild rodent surveillance program has identified risks posed by the Hantavirus in areas under construction. Construction activity shall be limited in areas identified as a risk and workers shall be notified of the findings.

-Require crews to use respirators during project clearing,

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 61 SP - MITIG MEASURE 6.3-15 (cont.) RECOMMND

grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations.

-Require that the cabs of grading and construction equipment be air-conditioned.

-Preferentially assign crews to work upwind from excavation sites to the greatest extent possible. This measure does not apply to persons with positive coccidioidin skin tests (since those with positive tests can be considered immune to reinfection of valley fever).

-Pave or apply sufficient water or environmentally safe dust control agents on all construction roads.

-Where acceptable to the fire department, control weed growth by mowing instead of discing, thereby leaving the ground undisturbed and with a mulch covering.

-During rough grading and construction, the access way into the project site from adjoining paved roadways should be paved or treated with water or environmentally safe dust control agents."

30.PLANNING. 62 SP - MITIG MEASURE 6.3-16 RECOMMND

Mitigation Measure 6.3-16 from EIR514 requires:

Prior to implementing project approval, stationary sources of diesel, ozone, or particulate matter (PM10 and PM2.5) contaminants or projects attracting or generating substantial numbers of diesel truck trips shall be required to demonstrate to the County Planning Department that such projects would not exceed the health-based significance thresholds established by the SCAQMD and/or ICAPCD as appropriate. Based on the current health-based significance thresholds, if the assessment determines that the project would result in an incremental increase in cancer risk of more than 10 in 1 million at the maximally impacted residential, sensitive, and off-site workplace receptors or that the chronic hazard indices for non-cancer health impacts are above 1.0 at the maximally exposed residential, sensitive, and off-site workplace receptors, the proposed project shall be required to implement project design changes or measures that would reduce impacts to below the

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30.PLANNING. 62 SP - MITIG MEASURE 6.3-16 (cont.) RECOMMND

thresholds.

30.PLANNING. 63 SP - MITIG MEASURE 6.3-19 RECOMMND

Mitigation Measure 6.3-19 from EIR514 requires:

Prior to implementing project approval, plans demonstrating that auto body shops with painting/coating operations are to be located at least 1 mile feet from odor sensitive receptors shall be submitted to the County Planning Department for review and approval.

30.PLANNING. 64 SP - MITIG MEASURE 6.3-20 RECOMMND

Mitigation Measure 6.3-20 from EIR514 requires:

Prior to implementing project approval, plans demonstrating that asphalt plants are to be located at least 1 mile feet from odor sensitive receptors shall be submitted to the County Planning Department for review and approval.

30.PLANNING. 65 SP - MITIG MEASURE 6.5-1 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.5-1 from EIR514 requires:

Prior to issuance of a grading permit, as required by State CEQA Guidelines Sections 15064.5(e) and (f), a cultural resources management plan (CRMP) shall be prepared and submitted for the appropriate County Planning Department for review and approval. The CRMP shall contain detailed provisions for the treatment of unanticipated discoveries during project construction, including human remains. The provisions of the CRMP should be consistent with state law as contained in Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98. Such mitigation shall be addressed in a manner consistent with the following:

-If buried materials of potential historical or cultural

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30.PLANNING. 65 SP - MITIG MEASURE 6.5-1 (cont.) RECOMMND

significance are accidentally discovered during any earth-moving operations associated with the proposed project, all work in that area shall be halted or diverted until a qualified historian/archaeologist can evaluate the nature and significance of the finds. If the find is determined to be an historical resource, as defined in Section 15064.5 of the California Code of Regulations (State CEQA Guidelines), avoidance or other appropriate measures as discussed in the CRMP shall be implemented.

-If evidence of potentially significant prehistoric or historic resources is uncovered during project-related grading areas in which archaeological and Native American monitoring has already been required, the extent of monitoring shall be amended and the presence of a Native American monitors shall be incorporated into the monitoring program for all areas in the affected tentative tract."

30.PLANNING. 66 SP - MITIG MEASURE 6.5-3 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.5-3 from EIR514 requires:

Prior to grading final for any grading activity near any of the sites listed below, the respective following site shall be tested and evaluated in consultation with the Torres-Martinez Desert Cahuilla Indians as required, and pursuant to the requirements of Phase II Archaeological standards and practices, as approved by Riverside County, for the sites to determine integrity, data potential and significance: CA-RIV-8891 (33-17082), CA-RIV-8894 (33-17085), CA-RIV-8895 (33-17086), CA-RIV-8896 (33-17087), CA-IMP-8784 (13-009821), CA-IMP-8785 (13-009822), CA-IMP-8786 (13 009823), CA-IMP-92, CA-IMP-100, and CA-IMP-2626."

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30.PLANNING. 67 SP - MITIG MEASURE 6.5-6 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.5-6 from EIR514 requires:

Prior to grading final for each implementing project, the areas under consideration shall be monitored by a County-approved and qualified paleontologist, who shall develop a formal agreement with a recognized museum repository, such as the Natural History Museum of Los Angeles County Vertebrate Paleontology Department (LACM). Prior to earth moving activities, the paleontologist shall coordinate with appropriate construction contractor personnel.

Should paleontological resources be discovered during earthmoving activities, work shall cease and no further disturbance shall occur in the immediate vicinity of the uncovered resource and an area 50 feet in diameter of the find. A paleontologist shall be contacted to investigate the find and, if deemed necessary, collect uncovered paleontological resources, curate any resources collected with an appropriate reposition, and file a report with the appropriate Planning Department documenting any paleontological resources that are found. Upon completion of the field investigation, collection of the resources, if necessary, and clearance of the find by the paleontologist, earthmoving activities may resume."

30.PLANNING. 68 SP - MITIG MEASURE 6.6-1 RECOMMND

Mitigation Measure 6.6-1 from EIR514 requires:

Prior to implementing project approval, site-specific geotechnical and engineering geologic investigations that analyze site-specific seismic shaking including provisions for appropriate construction techniques, including adherence to local codes and the California Building Code's design criteria for construction within former Seismic Zone 4, now Seismic Design Category E or F, shall be prepared by

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 68 SP - MITIG MEASURE 6.6-1 (cont.) RECOMMND

California-registered geotechnical engineers and certified engineering geologists, and submitted to the Riverside County Planning Department-Geology (or equivalent) for review and approval.

30.PLANNING. 69 SP - MITIG MEASURE 6.6-2 RECOMMND

Mitigation Measure 6.6-2 from EIR514 requires:

Prior to implementing project approval, site-specific geotechnical and engineering geologic investigations shall analyze site-specific lateral spread landslide potential (in accordance with Special Report 117 and the 2007 CBC) and (as appropriate) include provisions for appropriate construction techniques. This shall include adherence to the California Building Code's design criteria for construction within Seismic Design Category E or F. This study and all appropriate recommendations shall be prepared by California registered geotechnical engineers and certified engineering geologists, and submitted to the Riverside County Planning Department-Geology (or equivalent) for review and approval.

30.PLANNING. 70 SP - MITIG MEASURE 6.6-3 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GARDING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.6-3 from EIR514 requires:

Prior to the issuance of grading permits and in compliance with the requirements of Riverside County ordinances, a detailed design-level geotechnical report(s) shall be submitted to the County's Geologist for review and approval concurrent with each tract map or parcel map application. The report(s) shall identify and address site-specific (a) underlying soil conditions (including corrosive and expansive soil conditions), (b) liquefaction potential, (c) seismic parameters and building requirements, (d) tile drain and subdrainage system conditions, and (e) slope stability and rockfall hazards. The measures recommended in

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30.PLANNING. 70 SP - MITIG MEASURE 6.6-3 (cont.) RECOMMND

the final geotechnical report(s) shall be identified on applicable grading plans and shall be implemented to the satisfaction of the County Geologist. Grading shall be performed in accordance with applicable provisions of the Standard Grading Specifications contained in the design-level geotechnical reports."

30.PLANNING. 71 SP - MITIG MEASURE 6.6-4(A) RECOMMND

Mitigation Measure 6.6-4 from EIR514 requires:

Prior to implementing project approval (and grading final, see 30.PLANNING.72) site-specific hydrologic, geotechnical and engineering geologic investigations shall analyze site-specific soils for erosion, sedimentation, and debris flow potential (in accordance with local codes and the 2007 CBC) and (as appropriate) include provisions for appropriate construction techniques. These studies and all appropriate recommendations shall be prepared by California registered geotechnical engineers, registered civil engineers, and certified engineering geologists, and submitted to the Riverside County Planning Department-Geology (or equivalent) for review and approval.

30.PLANNING. 72 SP - MITIG MEASURE 6.6-4(B) RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.6-4from EIR514 requires:

Prior to grading final, site-specific hydrologic, geotechnical and engineering geologic investigations shall analyze site-specific soils for erosion, sedimentation, and debris flow potential (in accordance with local codes and the 2007 CBC) and (as appropriate) include provisions for appropriate construction techniques. These studies and all appropriate recommendations shall be prepared by California registered geotechnical engineers, registered civil

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 72 SP - MITIG MEASURE 6.6-4(B) (cont.) RECOMMND

engineers, and certified engineering geologists, and submitted to the Riverside County Planning Department-Geology (or equivalent) for review and approval."

30.PLANNING. 73 SP - MITIG MEASURE 6.6-5 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.6-5 from EIR514 requires:

Prior to grading final for each implementing project, the project applicant shall submit a copy of the Notice of Intent (NOI) to obtain coverage under the Construction General Permit of the National Pollutant Discharge Elimination System (NPDES) issued by the Colorado River Regional Water Quality Control Board (CRRWQCB). The applicant shall submit a copy of the NOI and shall provide a copy of the required Storm Water Pollution Prevention Plan (SWPPP) to Riverside (or equivalent) for review and approval. A copy of the SWPPP must be maintained on the project site during grading and construction activities. The Riverside County Planning Department shall review the documentation and shall conduct site inspections during construction to monitor for compliance with the SWPPP. The project's SWPPP shall also include the following provisions:

-Pre-Grading: The portions of the site to be graded shall be pre-watered to a depth designated by the soils engineer prior to the onset of grading operations.

-Pre-Grading: Undisturbed areas of biological soil crusts in "non-construction" areas adjacent to proposed roadways, buildings, parking areas, etc., shall be marked so that unnecessary disturbance of the biological soil crusts is minimized.

-During Grading: Once grading has commenced, and until

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 73 SP - MITIG MEASURE 6.6-5 (cont.) RECOMMND

grading has been completed, watering of the site and/or other treatment(s) determined to be appropriate shall be ongoing.

-Post-Grading: All disturbed areas shall be treated to prevent erosion during the term that the area will remain undeveloped.

-Landscape and irrigation shall be installed per future plan submittals."

30.PLANNING. 74 SP - MITIG MEASURE 6.6-6 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.6-6 from EIR514 requires:

Prior to grading final for each implementing project, the applicant/owner shall submit and implement a Storm Water Quality Management Plan (SWQMP). The SWQMP shall include the following elements: identification of potential pollutant sources that may affect the quality of the storm water discharges; the proposed design and placement of structural and non-structural best management practices (BMPs) to address identified pollutants; a proposed inspection and maintenance program; and a method for ensuring maintenance of all BMPs over the life of the project. The approved measures shall also be shown on site, building, and grading plans. Maintenance records shall be maintained by the applicant/owner for residential developments, or landowners for commercial developments. Prior to approval of the Land Use Permit, the SWQMP shall be submitted to Riverside County Flood Control and Water Conservation District. All measures specified in the plan shall be constructed and operational prior to occupancy clearance. Maintenance records shall be submitted to Riverside County Planning Department on an annual basis prior to the start of the rainy season and for five years thereafter. After the fifth year, the records shall be

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 74 SP - MITIG MEASURE 6.6-6 (cont.) RECOMMND

maintained by the landowner or applicant/owner, and be made available to Riverside County Planning Department on request."

30.PLANNING. 75 SP - MITIG MEASURE 6.6-7 RECOMMND

Mitigation Measure 6.6-7 from EIR514 requires:

Prior to implementing project approval, site-specific geotechnical investigations shall be prepared and submitted to the Riverside County of Planning Department-Geology, as appropriate, to identify areas of potential shallow groundwater. The geotechnical studies shall identify appropriate construction techniques (e.g., dewatering, groundwater barriers, et al.) where groundwater is identified within 50 feet of the ground surface.

30.PLANNING. 76 SP - MITIG MEASURE 6.6-8 RECOMMND

Mitigation Measure 6.6-8 from EIR514 requires:

Prior to implementing project approval, site-specific geotechnical investigations shall be prepared and submitted to the Riverside County Planning Department-Geology, as appropriate, to identify potential impacts related to subsidence. The geotechnical studies shall identify appropriate construction techniques to be used during grading and building design such as the compaction of soils, modified grading techniques, use of spread footings, the use of post tensioned slabs, and other methods.

30.PLANNING. 77 SP - MITIG MEASURE 6.6-9 RECOMMND

Mitigation Measure 6.6-9 from EIR514 requires:

Prior to implementing project approval, site-specific geotechnical and engineering geologic investigations that analyze site-specific soil conditions, including the potential for collapsible soils, shall be prepared by California registered geotechnical engineers and certified engineering geologists, and submitted to the Riverside County Planning Department-Geology (or equivalent) for review and approval. Recommended mitigations may include overexcavation of the subject soils and recompaction on new engineered fill material, possibly pre-saturating the subject soils, and provision of proper surface drainage

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 77 SP - MITIG MEASURE 6.6-9 (cont.) RECOMMND

away from structures and building foundations.

30.PLANNING. 78 SP - MITIG MEASURE 6.6-10 RECOMMND

Mitigation Measure 6.6-10 from EIR514 requires:

Prior to implementing project approval, site-specific geotechnical studies, including soil expansion tests, shall be prepared and submitted to the Riverside County Planning Department-Geology, as appropriate, and shall include appropriate construction methods to reduce impacts from expansive soils.

30.PLANNING. 79 SP - MITIG MEASURE 6.7-2 RECOMMND

Mitigation Measure 6.7-2 from EIR514 requires:

Prior to implementing project approval and grading final, future applicants for implementing projects and grading permits on the project site shall conduct a site survey by a County-approved licensed professional to identify and remediate all contaminated soils on the project site. All pesticide residue measured in on-site soils shall not exceed the applicable Preliminary Remediation Goals and the survey report shall be approved and documented by the Riverside County Department of Environmental Health.

30.PLANNING. 80 SP - MITIG MEASURE 6.7-3 RECOMMND

Mitigation Measure 6.7-3 from EIR514 requires:

Prior to implementing project approval, the applicant shall submit plans to the Coachella Valley Mosquito and Vector Control District (CVMVCD) which identify potential breeding sources for mosquitoes (such as standing water in street catch basins, subdivision drains, roadside ditches, flood channels, ravines, and similar places on public right-of-way and parks) that demonstrate designs that would minimize such breeding sources.

30.PLANNING. 81 SP - MITIG MEASURE 6.8-1 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

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30.PLANNING. 81 SP - MITIG MEASURE 6.8-1 (cont.) RECOMMND

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.8-1 from EIR514 requires:

Prior to grading final for each implementing project, a project-specific water quality management plan (WQMP) shall be submitted to Riverside County for review and approval."

30.PLANNING. 82 SP - MITIG MEASURE 6.8-2 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.8-2 from EIR514 requires:

Prior to grading final for each implementing project, a detailed operation and maintenance plan shall be submitted to the Riverside County, and Coachella Valley Water District, for review and approval for the as-built project conditions."

30.PLANNING. 83 SP - MITIG MEASURE 6.8-3 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.8-3 from EIR514 requires:

Prior to grading final for each implementing project, a Storm Water Pollution Prevention Plan (SWPPP) shall be developed and submitted to the Regional Water Quality

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 83 SP - MITIG MEASURE 6.8-3 (cont.) RECOMMND

Control Board for review approval. The SWPPP shall identify potential sources of pollution and specify runoff controls or BMPs during construction for the purpose of minimizing the discharge of pollutants in stormwater from the construction area. In addition, the SWPPP must identify post-construction control measures and a monitoring plan."

30.PLANNING. 84 SP - MITIG MEASURE 6.8-5 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.8-5 from EIR514 requires:

Prior to grading final for each implementing project, the applicant shall provide a plan for re-routing or connecting to existing irrigation and drainage facilities. This may include use of or alternation to facilities operated by or within the rights-of-way of other entities/The plan shall be submitted to the appropriate agency (US Bureau of Reclamation, Caltrans, or Coachella Valley Water District) for review and approval."

30.PLANNING. 85 SP - MITIG MEASURE 6.8-6 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.8-6 from EIR514 requires:

During grading, the existing under-drainage system (tile drains), shall be preserved, where possible, to reduce potential adverse effects due to groundwater. Light weight excavation equipment shall be used where excavations come near the existing title drains to prevent damage to the

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 85 SP - MITIG MEASURE 6.8-6 (cont.) RECOMMND

underdrainage system. Where the tile drains are to be disrupted or exposed during grading, a replacement set of drains will be needed. The grading and construction aspects of the underdrainage system shall be performed under the guidance, observation/documentation, and recommendations of the Project Geologist. A formal evaluation of the installed subdrainage system, including the remaining tile drains, shall be evaluated for operation and flow once grading activities are completed. This report shall be prepared by the Project Geologist, the Project Civil Engineer, or the Project Agricultural/Civil Engineer and submitted to Riverside County for review."

30.PLANNING. 86 SP - MITIG MEASURE 6.8-8 RECOMMND

Mitigation Measure 6.8-8 from EIR514 requires:

Prior to implementing project approval, the applicant shall submit to Coachella Valley Water District (CVWD) for review and approval a hydrologic study that evaluates the potential flows from Un-Named Canyon-Fan 6 and Barton Canyon-Fan 5. This study will identify facilities to be constructed to collect, route and discharge flows in a manner compatible with pre-project/existing conditions across the project site.

30.PLANNING. 87 SP - MITIG MEASURE 6.8-10 RECOMMND

Mitigation Measure 6.8-10 from EIR514 requires:

Prior to implementing project approval for each phase or district, as appropriate, the applicant shall submit for review and approval a hydrology report to address potential erosion issues within the proposed channels to demonstrate that the channels remain stable, maintain their flood conveyance capacity, and do not alter properties upstream of the proposed project.

30.PLANNING. 88 SP - MITIG MEASURE 6.11-3 RECOMMND

Mitigation Measure 6.11-3 from EIR514 requires:

Prior to implementing project approval for each implementing project, for residential lots located within 65 dB(A) CNEL or greater noise contour or adjacent to a road that is classified as a secondary or larger, an

30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 88 SP - MITIG MEASURE 6.11-3 (cont.) RECOMMND

acoustic analysis shall be required to address requirements for determining and mitigating traffic noise impacts to residential structures. The acoustical analysis must be received, reviewed, and approved by the appropriate agency (such as the Riverside County Office of Industrial Hygiene). Methods that may be implemented to meet the standards include, but are not limited to, providing noise walls of sufficient size to break the line of sight between roadways and residential areas, providing open-space buffers, providing natural barriers such as hills, berms, boulders, and dense vegetation, or a combination of these methods.

30.PLANNING. 89 SP - MITIG MEASURE 6.11-4 RECOMMND

Mitigation Measure 6.11-4 from EIR514 requires:

Prior to implementing project approval for each implementing project, a future noise study is required to address the stationary commercial noise standard as it relates to parking lot noise. Facility-related noise as projected to any portion of any surrounding property containing a "habitable dwelling, hospital, school, library, or nursing home," must not exceed the following worst-case noise levels of 45 dB(A) - 10-minute noise equivalent level (Leq) between the hours of 10:00 PM to 7:00 AM (nighttime standard); and 65 dB(A) - 10-minute Leq, between 7:00 AM and 10:00 PM (daytime standard). The noise study must be received, reviewed, and approved by the appropriate agency (such as the Riverside County Office of Industrial Hygiene). Methods that may be employed to reduce parking lot noise may include a noise barrier of sufficient size to break the line of sight, an open-space buffer, a setback, or a combination of methods shall be developed along locations between parking lot noise and exterior usable areas within residential uses where these uses interface.

30.PLANNING. 90 SP - MITIG MEASURE 6.11-5 RECOMMND

Mitigation Measure 6.11-5 from EIR514 requires:

Prior to implementing project approval for each implementing project, a future noise study is required to address the stationary commercial noise standard as it relates to loading dock noise. Facility-related noise as

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30.PLANNING. 90 SP - MITIG MEASURE 6.11-5 (cont.) RECOMMND

projected to any portion of any surrounding property containing a "habitable dwelling, hospital, school, library, or nursing home," must not exceed the following worst-case noise levels of 45 dB(A) - 10-minute noise equivalent level (Leq) between the hours of 10:00 PM to 7:00 AM (nighttime standard); and 65 dB(A) - 10-minute Leq, between 7:00 AM and 10:00 PM (daytime standard). The noise study must be received, reviewed, and approved by the appropriate agency (such as the Riverside County Office of Industrial Hygiene) prior to each implementing project approval. Methods that may be employed to reduce parking lot noise may include designing loading docks to have either a depressed (i.e., below grade) loading dock area, an internal bay, or a wall to break the line of sight between residential land uses and loading operations.

30.PLANNING. 91 SP - MITIG MEASURE 6.11-6 RECOMMND

Mitigation Measure 6.11-6 from EIR514 requires:

Prior to implementing project approval, a future noise study is required to address the stationary commercial noise standard as it relates to mechanical, electrical, or other related commercial type noise. Facility-related noise as projected to any portion of any surrounding property containing a "habitable dwelling, hospital, school, library, or nursing home," must not exceed the following worst-case noise levels of 45 dB(A) - 10 minute noise equivalent level (Leq) between the hours of 10:00 PM to 7:00 AM (nighttime standard); and 65 dB(A) - 10-minute Leq, between 7:00 AM and 10:00 PM (daytime standard). The noise study must be received, reviewed, and approved by the appropriate agency (such as the Riverside County Office of Industrial Hygiene) prior to each implementing project approval. Method that may be employed to reduce mechanical, electrical, or other commercial type noise may include locating equipment away from receptor areas, proper selection and sizing of equipment, installation of equipment with proper acoustical shielding, and incorporating the use of parapets into building design.

30.PLANNING. 92 SP - MITIG MEASURE 6.11-7 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed

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30.PLANNING. 92 SP - MITIG MEASURE 6.11-7 (cont.) RECOMMND

on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.11-7 from EIR514 requires:

Prior to grading final for each implementing project, the construction contractors shall use best management practices (BMPs) to reduce vibration due to specific plan construction activities by implementing the following:

-identifying all uses in the vicinity that may be adversely affected by the vibrations, including residences built in earlier phases and non-residential land uses that may contain vibration-sensitive equipment;

-installing seismographs at the aforementioned sensitive locations to ensure that vibration thresholds are not exceeded, and/or that construction activities would not cause structural damage or adversely affect vibration-sensitive equipment;

-adjusting vibration amplitudes of the construction equipment used on site such as limiting the number of pieces operating in one location at the same time in areas where conditions would affect structures, the sensitivity of vibration sensitive equipment, and/or human tolerance;

-utilizing cast-in-drilled-hole (CIDH) piles in lieu of pile driving;

-providing notification to the residential land uses directly adjacent to the project site, at least 10 days in advance, of construction activities that are anticipated to result in vibration levels above the thresholds;

-conducting demolition, earthmoving, and ground-impacting operations sequentially, so as not to have two such operations occurring on the project site at the same time;

-selecting a demolition method to minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers); and/or

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30.PLANNING. 92 SP - MITIG MEASURE 6.11-7 (cont.) (cont.) RECOMMND

-operating earth-moving equipment on the construction site as far away as possible or practical from vibration-sensitive sites; using wheeled or rubber-tracked equipment, and using small pieces of equipment such as smaller bulldozers when possible.

The Riverside County Building and Safety Department shall monitor the conditions to determine that these BMPs are being utilized correctly and efficiently in order to reduce vibration impacts throughout the proposed project."

30.PLANNING. 93 SP - MITIG MEASURE 6.11-9 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.11-9from EIR514 requires:

Prior to grading final for each implementing project, the project applicant shall submit copies of proposed project construction documents and specifications to the Riverside County Building and Safety Department, as appropriate, indicating that construction staging areas along with the operation of earthmoving equipment within the project area is located as far away from vibration- and noise-sensitive sites as possible."

30.PLANNING. 94 SP - MITIG MEASURE 6.11-10 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.11-10 from EIR514 requires:

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 94 SP - MITIG MEASURE 6.11-10 (cont.) RECOMMND

Prior to grading final for each implementing project, the project applicant shall submit copies of proposed project construction documents and specifications to the Riverside County Planning Department, as appropriate, indicating that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible."

30.PLANNING. 95 SP - MITIG MEASURE 6.13-7 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.13-7 from EIR514 requires:

Prior to grading final, the construction contractor shall provide a plan for review and approval by Riverside County Fire Department (RCFD) to demonstrate that during all grading and site clearance activities, all earth-moving equipment shall be equipped with spark arrestors and at least two portable fire extinguishers per vehicle. All equipment used in the vegetation-clearance phase shall be equipped with spark arrestors and best available fire safety technology. The vegetation-clearance activities shall be coordinated with and approved by the RCFD or SCSD in advance."

30.PLANNING. 96 SP - MITIG MEASURE 6.13-8 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.13-8 from EIR514 requires:

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING. 96 SP - MITIG MEASURE 6.13-8 (cont.) RECOMMND

Prior to building final permit, the applicant shall submit proof that all structures adjacent to open space shall be designed to satisfy at least a 1-hour fire resistant rating. Such structures shall incorporate fire retardant features such as boxed-in eaves, reduced overhangs, double-paned windows, convection resistant roof design, non-combustible roofing material, and related design features, as determined necessary by the RCFD and/or SCSD. Building permits shall not be issued until review of fire-retarding architectural features has been completed by the RCFD and/or SCSD. Design standards meeting RCFD and/or SCSD shall be included in the Fire Hazard Reduction Program and incorporated into the Fire Hazard Reduction Design Guidelines for the residential units."

30.PLANNING. 97 SP - MITIG MEASURE 6.13-10 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.13-10 from EIR514 requires:

Prior to building final inspection, the applicant shall provide for the purchasers of residential, commercial, and industrial units in planning areas that would be located adjacent to Open Space-Conservation and other off-site undeveloped or natural areas to be notified as to the requirements and maintenance of a brush-clearance radius of 100 feet around all buildings pursuant to Riverside County Ordinance No. 787 as appropriate."

30.PLANNING. 98 SP - MITIG MEASURE 6.14-1 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing

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30.PLANNING. 98 SP - MITIG MEASURE 6.14-1 (cont.) RECOMMND

project:

Mitigation Measure 6.14-1 from EIR514 requires:

Prior to grading final for each implementing project, a designated parking area with a security officer shall be provided for the construction workers during grading and construction operations. A site security plan shall be prepared and submitted to the Riverside County Sherriff's Department by the contractor indicating security features that shall be incorporated on the construction site(s), such as fencing and locked entrances, and construction equipment, tools, and material shall be secured by locking or placing them within sheds and/or other inaccessible areas while not in use."

30.PLANNING. 99 SP - MITIG MEASURE 6.15-1 RECOMMND

Mitigation Measure 6.15-1 from EIR514 requires:

Prior to implementing project approval, applicant(s) for implementing project development shall pay the development impact fees at the designated level (Level I, II, or III) as set forth by the Coachella Valley Unified School District (CVUSD), at the current rate. Fees shall be paid based on the square-footage of development per single-family residential unit, multi-family residential unit, commercial unit, and secondary living unit as required by CVUSD policy in each implementing project area. Active adult residential units proposed in the specific plan shall pay the development impact fees at the designated level (Level I, II, or III) for commercial/industrial development, as set forth by the CVUSD, at the current rate.

30.PLANNING.100 SP - MITIG MEASURE 6.16-1 RECOMMND

Mitigation Measure 6.16-1 from EIR514 requires:

Prior to the implementing project approval, a final biding Memorandum of Understanding (MOU) shall be executed between the applicant and Desert Recreation District (DRD) for the maintenance and operation of parks, including regional parks, within Riverside County. For the open space areas and other public parks areas within Riverside County not included as part of the final binding MOU between the

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30.PLANNING.100 SP - MITIG MEASURE 6.16-1 (cont.) RECOMMND

applicant and DRD, the applicant shall annex into Community Service Area (CSA) 125, or other appropriate CSA, to provide for the maintenance and operation of such areas.

30.PLANNING.101 SP - MITIG MEASURE 6.18-1 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.18-1 from EIR514 requires:

Prior to grading final for each implementing project, the contractors for construction activities for the applicants of implementing projects shall prepare a construction safety plan and submit it to the appropriate County Planning Department and Fire Department for review and approval. The plan shall include provisions for safety activities, including prevention, work-related injuries, on-site safety equipment, notification procedures, and other activities to prevent, reduce, and respond to injuries during construction."

30.PLANNING.102 SP - MITIG MEASURE 6.20-1 RECOMMND

Mitigation Measure 6.20-1 from EIR514 requires:

Prior to implementing project approval, future applicants for development permits must submit plans for water delivery systems to Coachella Valley Water District (CVWD) for review and approval.

30.PLANNING.103 SP - MITIG MEASURE 6.20-2 RECOMMND

Mitigation Measure 6.20-2 from EIR514 requires:

Prior to implementing project approval, water quality testing for irrigation and fire suppression that uses nonpotable water shall submit documentation to Coachella Valley Water District (CVWD) indicating that the water quality meets the requirements of the California Department

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30.PLANNING.103 SP - MITIG MEASURE 6.20-2 (cont.) RECOMMND

of Public Health and fire flow requirements for the Fire Department.

30.PLANNING.104 SP - MITIG MEASURE 6.22-1 RECOMMND

Mitigation Measure 6.22-1 from EIR514 requires:

Prior to implementing project approval, a Waste Recycling Plan (WRP) shall be submitted to the appropriate County Waste Management Department or Planning Department for approval. At a minimum the WRP shall identify the materials (e.g., concrete, asphalt, wood, etc.) that would be generated by construction and development, the project amounts, measures/methods that would be implemented to recycle, reuse, and/or reduce the amount of materials, the facilities and haulers that would be utilized, and the targeted recycling or reduction rates to be achieved.

30.PLANNING.105 SP - MITIG MEASURE 6.22-7 RECOMMND

Mitigation Measure 6.22-7 from EIR514 requires:

Prior to implementing project approval, applicant(s) shall submit for review and approval landscape plans that provide for the use of xeriscape landscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.

30.PLANNING.106 SP - MITIG MEASURE 6.23-1 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.23-1 from EIR514 requires:

Prior to building final, residential and commercial buildings shall be conditioned to participate in any future programs, such as green pricing programs, which allow customers to support the development of renewable energy sources by paying a small premium on their electric bills,

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30.PLANNING.106 SP - MITIG MEASURE 6.23-1 (cont.) RECOMMND

established by the Imperial Irrigation District. If the district establishes a green pricing program whereby energy generated from renewable resources either exclusively or at a higher proportion may be purchased, the proposed project shall participate in the program. Proof of participation (enrollment) shall be submitted to the Planning Department within 30 days of occupancy."

30.PLANNING.107 SP - MITIG MEASURE 6.23-2 RECOMMND

Mitigation Measure 6.23-2 from EIR514 requires:

Prior to implementing project approval, the applicant shall submit plans showing the proposed locations of electricity transmission and distribution infrastructure to the Imperial Irrigation District for review and approval.

30.PLANNING.108 SP - MITIG MEASURE 6.24-1 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-1 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide a listing of the green building practices and design elements used in the building that reduce GHG emissions to the appropriate Planning Department. The green building practices and design elements shall be consistent with the CAP and any other green building standards adopted by either Riverside County. (See, e.g., California Department of Housing and Community Development's Green Building & Sustainability Resources handbook at www.hcd.ca.gov/hpd/green_build.pdf; e.g., the American Institute of Architects at http://www.wiki.aia.org/Wiki%20Pages/Home.aspx)"

30.PLANNING.109 SP - MITIG MEASURE 6.24-2 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit,

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.109 SP - MITIG MEASURE 6.24-2 (cont.) RECOMMND

plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUILDING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-2 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence of its use of energy-efficient designs meeting and/or consistent with the standards in the CAP and any other green building standards adopted by either Riverside County to the appropriate Planning Department. In accordance with the CAP, all residential buildings shall, at a minimum, exceed Title 24 (2008) by 30 percent and all non-residential buildings shall, at a minimum, exceed Title 24 (2008) by 15 percent. This measure does not exempt buildings from meeting future energy efficiency obligations that may result from future revisions to the Title 24 standards."

30.PLANNING.110 SP - MITIG MEASURE 6.24-3 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-3 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence to the appropriate Planning Department of its use of energy efficient lighting, heating and cooling systems, appliances, equipment, and control systems, including the installation of ENERGY STAR-certified products, consistent with the standards in the CAP and any other energy efficiency standards adopted by either Riverside County or \ County. (Information about ENERGY STAR-certified products are available at http://www.energystar.gov /index.cfm?fuseaction=find_a_product; see also the California Energy Commission's database of appliances meeting federal or state energy standards at

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30.PLANNING.110 SP - MITIG MEASURE 6.24-3 (cont.) RECOMMND

http://www.appliances .energy.ca.gov; see the Electronic Product Environmental Assessment Tool for ranking of energy efficient computer equipment at http://www.epeat.net /AboutEPEAT.aspx; see the Online Guide to Energy Efficient Commercial Equipment at http://www.aceee.org/ogeece/ch1_index .htm)"

30.PLANNING.111 SP - MITIG MEASURE 6.24-4 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-4 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence to the appropriate Planning Department of the use of "cool" roofs or "green" roofs, and cool pavements. (See Consumer Energy Center, Cool Roofs at http://www.consumerenergycenter .org/coolroof/)"

30.PLANNING.113 SP - MITIG MEASURE 6.24-5 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-5 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence to the appropriate Planning Department of the use of automatic covers, efficient pumps and motors, and solar heating for pools and spas. (See http://www.consumerenergycenter.org/home /outside/pools_spas.html)."

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30.PLANNING.114 SP - MITIG MEASURE 6.24-6 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-6 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence that the building is consistent with and/or does not conflict with the following Specific Plan-wide renewable energy targets:

-80 percent of residential units shall meet 60 percent of their baseline demand power energy needs with renewable energy; and

-80 percent of commercial building square footage shall meet 40 percent of their baseline demand power energy needs with renewable energy.

Should the individual structure not be able to demonstrate that power provided by the Imperial Irrigation District (IID) does not comply with this standard, then the individual structure shall comply by providing renewable energy power from a source within the limits of the Specific Plan. "

30.PLANNING.115 SP - MITIG MEASURE 6.24-7 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-7 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence to the appropriate Planning Department of the use of water efficient irrigation systems and devices, such as soil-based

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.115 SP - MITIG MEASURE 6.24-7 (cont.) RECOMMND

irrigation controls and use water-efficient irrigation methods consistent with measures recommended in the CAP. In accordance with the CAP, the applicant shall provide evidence that the building is consistent with the following Specific Plan-wide water conservation measures and/or does not prevent or conflict with the Specific Plan's ability to meet the following water conservation measures:

-90 percent of all builder-installed plumbing devices in each residential buildings will be low-flow and water-efficient;

-90 percent of all builder-installed plumbing devices in each non-residential buildings will be low-flow and water-efficient;

-Turf will not exceed 20 percent of the total landscaped area of each Planning Area, with the exception of parks, recreation centers, and schools;

-80 percent of public and common landscape areas will use smart irrigation systems per project; and

-80 percent of public and common landscape areas will use drought-tolerant, native, and/or water-efficient plant materials per project.

(See http://www1.eere.energy.gov/femp/program/waterefficiency_bmp5.html; see also http://www.water.ca.gov/wateruseefficiency/landscape/.)"

30.PLANNING.116 SP - MITIG MEASURE 6.24-8 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT FINAL INSPECTION, the following language shall be added to the implementing project:

Mitigation Measure 6.24-8 from EIR514 requires:

Prior to grading final for each implementing project, the

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.116 SP - MITIG MEASURE 6.24-8 (cont.) RECOMMND

applicant or their contractor shall submit to the appropriate Public Works Department for review and approval of a site construction management plan for the reuse and recycle construction and demolition waste (including soil, vegetation, concrete, lumber, metal, and cardboard). (See http://www.ciwmb.ca.gov/condemo/)."

30.PLANNING.117 SP - MITIG MEASURE 6.24-9 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-9 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence to the appropriate Planning Department of reuse and recycling measures in residential, industrial, and commercial projects consistent with measures recommended in the CAP. In accordance with the CAP, the applicant shall provide evidence that the building is consistent with the following Specific

Plan-wide recycling and waste reduction measures and/or does not prevent or conflict with the Specific Plan's ability to meet the following recycling and waste reduction measures:

-Provide recycling containers within all multi-family residential communities;

-Provide recycling containers within all commercial, office, and light industrial buildings;

-Provide containers for community composting within all multi-family residential communities; and

-Provide containers for community composting within all commercial, office, and light industrial buildings.

(See http://zerowaste.ca.gov; see also http://www.ca-ilg.org/wastereduction)."

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.118 SP - MITIG MEASURE 6.24-10 RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF BUIDLING PERMIT, the following language shall be added to the implementing project:

Mitigation Measure 6.24-10 from EIR514 requires:

Prior to the issuance of each building permit, the applicant shall provide evidence to the appropriate Planning Department of the use of "smart growth" principles to reduce GHG emissions (i.e., ensure mixed-use, infill and higher density projects provide alternatives to individual vehicle travel and promote efficient delivery of goods and services) consistent with measures recommended in the CAP. In accordance with the CAP, the applicant shall provide evidence that the building is consistent with the following Specific Plan-wide "smart growth" measures and/or does not prevent or conflict with the Specific Plan's ability to meet the following "smart growth" measures:

-60 percent of building frontages will have the principal functional entry facing a public space such as a street, square, park, paseo, or plaza, but not a parking lot based on type of project;

-75 percent of mixed-use streets shall have minimum 8-foot-wide sidewalks that front primarily commercial retail uses and all other areas will have minimum 4-foot-wide sidewalks;

-60 percent of all housing with a density of 7 dwelling units per acre or more will lie within 0.5 mile of a transit stop;

(See http://www.epa.gov/smartgrowth/index.htm.)"

30.PLANNING.119 SP - MITIG MEASURE 6.24-11 RECOMMND

Mitigation Measure 6.24-11 from EIR514 requires:

Prior to implementing project approval for each tract map, the applicant shall preserve existing trees, to the extent feasible and encourage the planting of new trees consistent

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.119 SP - MITIG MEASURE 6.24-11 (cont.) RECOMMND

with the final landscape palette in the Specific Plan. Removed trees shall be replaced at a minimum 1:1 ratio in accordance with acceptable tree species defined in the final landscape palette.

(See http://www.epa.gov/dced/brownfields.htm)

30.PLANNING.123 SP - TOTAL BP/DU TRKNG RECOMMND

Prior to the approval of any implementing project, the applicant shall provide a "SP375 Total Dwelling Unit Tracking Spreadsheet." This spreadsheet shall be considered part of the SPECIFIC PLAN. Over time, this spreadsheet will track per Planning Area entitled units, tentative tract map units, final map recorded units and units actually built within every Planning Area in the SPECIFIC PLAN. The purpose of this tracking sheet is to enable the Planning Department to ensure compliance with the established Planning Area development ranges as outlined in Table 3-11 of the SPECIFIC PLAN. This sheet will also be used to ensure constancy with the separate tracking spread sheet referenced in condition 10.Planning.58 DU/BUILDING PERMIT MATRIX.

This condition cannot be DEFERRED or set to NOT APPLICABLE"

30.PLANNING.124 SP - TILE DRAINS (1) RECOMMND

PRIOR TO THE APPROVAL OF ANY IMPLEMENTING PROJECT (i.e. Tentative Map, Plot Plan, Conditional Use Permit, and/or Public Use Permit), given the high ground water table in the project area, all implementing projects must provide a letter from Coachella Valley Water District (CVWD) indicating that the subsurface drainage facilities (tile drains) in the implementing project area can accommodate the new urban drainage to the satisfaction of CVWD.

30.PLANNING.125 SP - TILE DRAINS (2) RECOMMND

PRIOR TO THE APPROVAL OF ANY IMPLEMENTING PROJECT (i.e. Tentative Map, Plot Plan, Conditional Use Permit, and/or Public Use Permit), given the high ground water table in the project area, all implementing projects must provide a letter from Coachella Valley Water District (CVWD) indicating that the boundaries shown on the APPROVED TENTATIVE MAP and/or SITE PLAN shall become annexed,

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.125 SP - TILE DRAINS (2) (cont.) RECOMMND

incorporated, and/or included to the satisfaction of the Colorado River Basin Water Quality Control Board into the National Pollution Discharge Elimination System Permit (NPDES) program as detailed by CVWD and as well the project shall annexed, incorporated, and/or included to the satisfaction of the Colorado River Basin Water Quality Control Board into the Waste Discharge Requirements for the discharge of stormwater into the Whitewater River Watershed, which is known as the MS4 Permit, to the satisfaction of CVWD.

30.PLANNING.126 SP - TILE DRAINS (3) RECOMMND

PRIOR TO THE APPROVAL OF ANY IMPLEMENTING PROJECT (i.e. Tentative Map, Plot Plan, Conditional Use Permit, and/or Public Use Permit), given the high ground water table in the project area, all implementing projects must provide a letter from Coachella Valley Water District (CVWD) indicating that the boundaries shown on the APPROVED TENTATIVE MAP and/or SITE PLAN shall become annexed, incorporated, and/or included to the satisfaction of CVWD into a future district(s) for recovery of capital and operation/maintenance costs associated with any tile/subsurface drainage system, to the satisfaction of CVWD.

30.PLANNING.127 SP - COMM FACILITY FINC SEC RECOMMND

Prior to the submittal of any implementing project within a Planning Area of the SPECIFIC PLAN, as outlined in exhibit B.6.16 of the SPECIFIC PLAN, the applicant shall provide financial securities for all community facilities improvements required within the respective Planning Area. All required improvements shall be completed within five (5) years of the approval of the first implementing project within the Planning Area. If any portion of the required community facilities improvements are not completed after five (5) years the County shall use the financial securities provided by the applicant to fund the completion of the remaining improvements. If all community facilities improvements are completed prior to the five (5) year requirement, all financial securities shall be returned to the applicant in full. Satisfaction of this condition shall be at the discretion of the Planning Director. No implementing project shall be approved unless evidence of secured financial securities

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.127 SP - COMM FACILITY FINC SEC (cont.) RECOMMND

for all community facilities improvements within the Planning Area is presented.

This condition cannot be waived, DEFERRED or set to NOT APPLICABLE. The condition shall be set to MET at the project level individually for each project prior to a project approval.

30.PLANNING.128 MM - CVWD SPECIAL AGREEMENT RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"Prior to building final inspection for the first residential unit and/or commercial unit within the Riverside County portion of the proposed project, the applicant shall execute a Special Agreement, with for CVWD to design, permit, construct, operate, and maintain an expandable wastewater treatment plant and nonpotable water storage and distribution system that shall be sized to initially accommodate approximately 3.0 mgd, or as approved by CVWD. Wastewater treatment and reuse facilities are provided for in Planning Area 4-3 or alternately an off-site location as provided for in the Wastewater Master Plan (see Figure 3.0-21). The project applicant shall provide necessary funding for the construction of this facility. All wastewater treatment facilities will be creditable toward the facilities component of CVWD's Sanitation Capacity charge for all residential, commercial, and industrial structures within CVWD's portion of the project boundary. The applicant's financial responsibility for these facilities is only for those components of the wastewater treatment facilities necessary to provide wastewater treatment for the proposed project's and its associated effluent."

30.PLANNING.150 SP - ARCHAEO STUDY REQD RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO PROJECT APPROVAL, a complete archaeological study

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.150 SP - ARCHAEO STUDY REQD (cont.) RECOMMND

shall be submitted to the Planning Department for review and approval. Adequate archaeological investigation shall be conducted to provide significance evaluations pursuant to CEQA for all cultural resources identified. This condition shall be considered MET if the relevant study has been approved by the Planning Department. This condition may be considered as NOT APPLICABLE if the Planning Department determines that the required study is not necessary.

The submittal of this study mandates that a CEQA determination of an Addendum to a previously adopted EIR be made, at a minimum."

30.PLANNING.151 SP - PALEO M/M PROGRAM RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMITS, the project applicant shall enter into an agreement with a qualified paleontologist. This agreement shall include, but not be limited to, the preparation of a project specific paleontological resources impact mitigation program (PRIMP) to be implemented during the process of grading.

A copy of said agreement and PRIMP shall be submitted to the County Geologist for review. No grading permit will be issued until the project specific agreement and PRIMP is reviewed and approved by the County Geologist.

30.PLANNING.153 SP - ARCHAEO M/M PROGRAM RECOMMND

Prior to the approval of any implementing project within the SPECIFIC PLAN (i.e.: tract map, parcel map, use permit, plot plan, etc.), the following condition shall be placed on the implementing project:

"PRIOR TO THE ISSUANCE OF GRADING PERMITS, the project applicant shall enter into an agreement with a qualified archaeologist. This agreement shall include, but not be limited to, the preliminary mitigation and monitoring procedures to be implemented during the process

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30. PRIOR TO ANY PROJECT APPROVAL

30.PLANNING.153 SP - ARCHAEO M/M PROGRAM (cont.) RECOMMND

of grading, as found in the Master Cultural Resources Plan for this Specific Plan. A copy of said agreement shall be submitted to the Planning Department. No grading permits will be issued unless the preliminary mitigation and monitoring procedures required prior to grading permits as described in the Master Cultural Resources Plan are substantially complied with."

TRANS DEPARTMENT

30.TRANS. 1 SP - SP375/IMPROVEMENTS RECOMMND

All roads shall be improved to the recommended General Plan or Specific Plan designation, as approved by the County Board of Supervisors, or as approved by the Transportation Department. If there is a conflict between the General Plan and Specific Plan, the General Plan designation would prevail unless specific findings are made by the County that the Specific Plan improvement is consistent with the General Plan.

30.TRANS. 2 SP - SP375/PAYMENT OF FEES RECOMMND

The project proponent shall be required to pay all applicable fees in accordance with the fee schedule in effect at the time of development.

30.TRANS. 3 SP - SP375/TS REQUIRED RECOMMND

During the District Refinement Plan (DRP) process, the project proponent shall prepare a Traffic Impact Analysis (TIA), in accordance with Riverside County guidelines, for each "Development District" within the SP. The District-level traffic analysis will be a refinement of the SP Traffic Impact Analysis and shall determine the need and timing of improvements needed to mitigate the traffic impacts of each Development District under conditions existing at the time of the DRP. In addition, TIAs for individual implementing projects may be required for individual implementing projects within the boundaries of SP00375, at the discretion of the Transportation Department. TIAs for individual implementing projects, if needed, shall identify the impacts of the implementing project and needed transportation system improvements to be constructed prior to each implementing project.

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 3 SP - SP375/TS REQUIRED (cont.) RECOMMND

Site-specific focused traffic studies may be required for subsequent implementing projects within the boundaries of SP00375. These subsequent traffic studies shall identify specific project impacts and needed transportation system improvements to be constructed in conjunction with each project.

Each implementing project shall make all necessary on-site and off-site improvements to achieve/maintain adequate LOS at all locations.

If development within SP00375 occurs in a different order than stated in 10. 3 TRANS. SP - SP375/ DEFINITION OF PROJECT PHASES BY PLANNING AREA, or if phases overlap substantially, a new DRP-level or project-level TIA may be required to determine if any improvements from the prior un-built phase need to be constructed to mitigate impacts by the phase being developed.

All improvements on Caltrans facilities shall conform to Caltrans design guidelines and shall be subject to Caltrans approval.

If any improvements proposed by the applicants for individual projects are found to be infeasible, the applicants for individual projects will be required to provide alternative feasible improvements to achieve levels of service satisfactory to the County.

All intersection spacing for individual tracts, parcel maps, CUPs, or plot plans shall conform to the minimum County intersection spacing standards.

All turn pocket lengths shall conform at least to the minimum County turn pocket length standards.

30.TRANS. 4 SP-SP375/SR-86 & SR-86S ML IMP RECOMMND

Prior to the issuance of any building permit for any implementing projects within SP00375, Riverside County shall prepare a financial plan to make mainline improvements to add one lane in each direction on SR-86S/SR-86 between 62nd Avenue and Marina Drive in Imperial County and to construct interchanges at SR-86S/62nd Avenue, SR-86S/66th Avenue, SR-86S/70th Avenue, SR-86S/74th Avenue, SR-86S/81st Avenue, SR-86/Town Center

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 4 SP-SP375/SR-86 & SR-86S ML IMP (cont.) RECOMMND

Way North, SR-86/Desert Shores Drive, SR-86/Brawley Avenue, SR-86/Sea Oasis Boulevard, and SR-86/Marina Drive. The financial plan shall identify the cost of the improvements based on a Preliminary Engineering study. In addition to fair share developer contributions, the financial plan shall consider funding that may be available through CVAG, RCTC, or other agencies. The County will assist in obtaining available funding that is, or may become available, through CVAG, RCTC, and other agencies, as appropriate.

Prior to the issuance of any building permit for any implementing projects within SP00375, Riverside County shall conduct a Nexus Study, based on the financial plan, and establish an RBBD or other funding mechanism in accordance with the Nexus Study recommendations.

If the County has not formed an RBBD or other area-wide funding mechanism for SR-86/SR-86S improvements at the time the proponent of SP00375 or any subsequent implementing agencies are ready to request building permits, , the project proponent shall establish a Community Facilities District (CFD) or other funding mechanism, prior to the issuance of any building permit within SP00375, to help fund its share of the cost of SR-86S/SR-86 mainline improvements (SP00375's fair share is estimated preliminarily as 37% of the total cost of the SR86 additional lane improvements) and its share of interchange construction at SR-86S/81st Avenue and at SR-86/Town Center Way North (SP00375's share is estimated preliminarily as 95 to 100% of the total cost).

Prior to the issuance of any building permit for any implementing projects within SP00375, the project proponent shall deposit with Riverside County the funds necessary for the County to prepare the Preliminary Engineering Study, the Financial Plan, and the Nexus Study (" the studies"). The project proponent shall be eligible for fee credits, fee credits not to exceed the amount of actual costs for the Studies, after the establishment of the RBBD or other corridor-wide funding mechanism.

After building permits for 1,608 residential units have been issued, no further building permit, or permits, shall be issued for any residential or non-residential implementing project in SP00375 until the project

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 4 SP-SP375/SR-86 & SR-86S ML IMP (cont.) (cont.RECOMMND

proponent, or implementing projects within SP00375, have deposited funds for Riverside County to prepare an environmental document for adding one lane in each direction along SR-86S/SR-86 between 62nd Avenue and Marina Drive in Imperial County. The project proponent, or the implementing projects, will be eligible for fee credits, fee credits not to exceed the amount of actual costs for the Studies, after the establishment of the RBBD or other area-wide funding mechanism. Based on subsequent traffic studies and at the discretion of the Director of Transportation, the threshold number of residential units may be adjusted.

After building permits for 5,718 residential units have been issued, no further building permit, or permits, shall be issued for any residential or non-residential implementing project in SP00375 until Riverside County obtains environmental clearance to add one lane in each direction along SR-86S/SR-86 between 62nd Avenue and Marina Drive in Imperial County. Based on subsequent traffic studies and at the discretion of the Director of Transportation, the threshold number of residential units may be adjusted. TUMF credit, where eligible, shall be provided in accordance with CVAG's policies and approvals.

After building permits for 5,718 residential units have been issued, no further building permit, or permits, shall be issued for any residential or non-residential implementing project in SP00375 until SR-86 has been improved to add one lane in each direction between the northern boundary of SP00375 and Town Center Way North. Based on subsequent traffic studies and at the discretion of the Director of Transportation, the threshold number of residential units may be adjusted.

After building permits for 11,864 residential units have been issued, no further building permit, or permits, shall be issued for any residential or non-residential implementing project in SP00375 until a construction contract, or contracts shall have been let to improve SR-86S/SR-86 to add one lane in each direction between 62nd Avenue and Marina Drive in Imperial County.

After building permits for 12,788 residential units have been issued, no further building permit, or permits, shall be issued for any residential or non-residential

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 4 SP-SP375/SR-86 & SR-86S ML IMP (cont.) (cont.RECOMMND

implementing project in SP00375 until SR-86S/SR-86 shall have been constructed to provide three lanes in each direction between 62nd Avenue and Marina Drive in Imperial County. Depending on the progress of construction and at the discretion of the Director of Transportation, the threshold number of residential units may be adjusted.

30.TRANS. 5 SP-SP375/IMPVTS SR-86 & SR86S RECOMMND

Prior to the issuance of any building permit for any implementing projects within SP00375, the project proponent shall obtain Caltrans approval to install a traffic signal and construct eastbound and westbound left turn lanes at the intersection of SR-86S and 81st Avenue.

Prior to the issuance of any building permit for any implementing projects within SP00375, the project proponent shall obtain Caltrans approval to install a traffic signal at the intersection of SR-86 and Lincoln Street (between 83rd Avenue and 84th Avenue) and to provide a southbound left turn lane. The signal at this location will be temporary and shall be removed when a grade separation (no access to SR-86) is constructed at this location.

Prior to the issuance of the 659th occupancy permit within SP00375, or earlier if the need is indicated in traffic studies for implementing projects, the proponent of SP00375 and/or implementing projects shall install and activate a traffic signal at SR-86S and 81st Avenue, and shall construct eastbound and westbound left turn lanes.

Prior to the issuance of the 659th occupancy permit, or earlier if the need is indicated in traffic studies for implementing projects, the proponent of SP00375 and/or implementing projects shall install and activate a traffic signal at SR-86 and Lincoln Street, and shall provide a southbound left turn lane. Access at this location shall be temporary, and the signal at this location shall be removed when a grade separation (no access to SR-86) is constructed.

After building permits for 8,139 residential units have been issued, no further building permit, or permits, shall be issued for any residential or non-residential implementing project in SP00375 until the proponent of SP00375, and/or implementing projects within the SP, shall

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 5 SP-SP375/IMPVTS SR-86 & SR86S (cont.) RECOMMND

have constructed a new interchange on SR-86 at Town Center Way North (approximately at 85th Avenue).

Where the need is indicated in Traffic Impact Analyses (TIAs) to be conducted during the District Refinement Process (DRP) or based on TIAs for specific implementing projects, taking into consideration conditions prevailing at the time, and unless otherwise implemented by others, the proponent of SP00375 and/or implementing projects shall install and activate off-site traffic signals and construct additional turning or through lanes at intersections along SR-86S/SR-86 (between 62nd Avenue and Marina Way) when needed to mitigate the traffic impacts of implementing projects within SP00375, or shall make in lieu payments, or as approved by the Director of Transportation.

30.TRANS. 6 SP - SP375/TRAFFIC SIGNALS RECOMMND

The project proponent, or the implementing projects within the SP, shall be responsible for the design, installation and necessary modifications to all on-site traffic signals. Signals shall be installed, modified as needed, and shall be operational, or other traffic control measures, such as roundabouts shall be installed at the locations indicated in Exhibit 2.1C and Exhibits 6.2-B through 6.2-T of the TSS dated August 5, 2010.

Where the need is indicated in DRP-level or project-level TIAs and , unless the signals are designed and installed by others, the project proponent, or the implementing projects within the SP, shall also be responsible for the design, installation and necessary modifications to off-site traffic signals at the intersections listed below. Any on-site intersections on SR-86 and SR-86S are included in the "off-site" list, since they will help accommodate external traffic.

Prior to the issuance of any certificates of occupancy that would result in more than 658 dwelling units in SP00375, or sooner if the need is indicated in project-level TIAs, the following signals shall be installed and operational:

SR-86S (NS) at:
81st Avenue (EW)

SR-86 (NS) at:

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 6 SP - SP375/TRAFFIC SIGNALS (cont.) RECOMMND

Lincoln Street (EW)

with no credit given for Traffic Signal Mitigation Fees

Prior to the issuance of any certificates of occupancy that would result in more than 2,600 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following signals shall be installed and operational:

81st Avenue (EW) at:
Paseo Street (NS)

Prior to the issuance of any certificates of occupancy that would result in more than 2,818 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following signals shall be installed and operational, with credit toward signal mitigation fees if the signal is included in the DIF needs list at the time of installation.

Harrison Street (NS) at:
62nd Avenue (EW)

Harrison Street (NS) at:
66th Avenue (EW)

Harrison Street (NS) at:
70th Avenue (EW)

Harrison Street (NS) at:
74th Avenue (EW)

Harrison Street (NS) at:
Pierce Street (EW)

Unless DRP-level or project-level TIAs indicate that one or more signals are not needed or can be deferred to a later stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 3,071 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level traffic studies, the following signals shall

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 6 SP - SP375/TRAFFIC SIGNALS (cont.) (cont.) RECOMMND

be installed and operational:

81st Avenue (EW) at:
Harrison Street/SR-86 (NS)

with no credit given for Traffic Signal Mitigation Fees

Prior to the issuance of any certificates of occupancy that would result in more than 3,478 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level traffic studies, the following signals shall be installed and operational:

SR-86 (NS) at:
Town Center Way (EW)

with no credit given for Traffic Signal Mitigation Fees

Prior to the issuance of any certificates of occupancy that would result in more than 5,284 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level traffic studies, the following signals shall be installed, or modified, and operational, with credit toward signal mitigation fees if the signal is included in the DIF needs list at the time of installation.

Harrison Street (NS) at:
72nd Avenue (EW)

Harrison Street (NS) at:
78th Avenue (EW)

SR-86S (NS) at:
70th Avenue (EW)

SR-86S (NS) at:
74th Avenue (EW)

SR-86 (NS) at:
Desert Shores Drive (EW)

SR-86 (NS) at:

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 6 SP - SP375/TRAFFIC SIGNALS (cont.) (cont.) (cRECOMMND

Brawley Avenue (EW)

SR-86 (NS) at:
Sea Oasis Boulevard (EW)

SR-86 (NS) at:
Marina Drive (EW)

unless otherwise approved by Imperial County, or DRP-level or project-level TIAs indicate that one or more signals are not needed or can be deferred to a later stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 13,260 dwelling units in SP00375, or sooner if the need is indicated in DRP-level traffic studies, signals shall be installed, modified as needed, and shall be operational, or other traffic control measures, such as roundabouts, shall be installed at the locations indicated in Exhibit 2.1C and Exhibits 6.2-B through 6.2-T of the TSS dated August 5, 2010.

with no credit given for Traffic Signal Mitigation Fees

The modification of traffic signals to accommodate the phased improvements shall be the responsibility of the SP00375 proponent or the implementing projects.

30.TRANS. 8 SP - SP375/GEOMETRICS RECOMMND

The project proponent, or the implementing projects within the SP, shall be responsible for the necessary improvements or modifications at all on-site intersections. The improvements shall be made at the locations indicated and with the number of lanes as specified in Exhibit 2.1C and Exhibits 6.2-B through 6.2-T of the TSS dated August 5, 2010.

Where the need is indicated in DRP-level or project-level TIAs and, unless the improvements are made by others prior to the time they are needed, the project proponent, or the implementing projects within the SP, shall also be responsible for the improvements at the off-site intersections listed below. If eligible under any applicable funding programs in effect at the time of

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) RECOMMND

implementation, these improvements may qualify for fee credits. Any on-site intersections on SR-86 and SR-86S are included in the "off-site" list, since they will help accommodate external traffic.

While the intersection improvements, both on-site and off-site, may be made in phases as the need arises, all improvements shall be designed and constructed to be consistent with the ultimate configuration of the intersection. All improvements listed below can be deferred to a later stage, or accelerated to an earlier stage of development, subject to the approval of the Director of Transportation based on subsequent traffic studies. Depending on the progress of construction and at the discretion of the Director of Transportation, the threshold number of residential units may be adjusted.

Prior to the issuance of any certificates of occupancy that would result in more than 658 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of SR-86S (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one right turn lane
Southbound:One left turn lane, two through lanes, one right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

The intersection of SR-86S (N/S) and Lincoln Street (E/W) shall provide the following geometrics:

Northbound:Two through lanes, one right turn lane
Southbound:One left turn lane, two through lanes
Eastbound:N/A
Westbound:One left turn lane, one shared through/right turn lane

The intersection of Paseo Street (N/S) and 81st Avenue

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) RECOMMND

(E/W) shall provide the following geometrics:

Northbound:One shared left turn/right turn lane - stop control
Southbound:NA
Eastbound:One shared through/right turn lane
Westbound:One shared left turn/through lane

The intersection of Lincoln Street (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane
Southbound:NA
Eastbound:One right turn lane
Westbound:NA

Prior to the issuance of any certificates of occupancy that would result in more than 2,818 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following offsite intersection improvements shall be made. If eligible under any applicable funding programs in effect at the time of implementation, these improvements may qualify for fee credits.

The intersection of Harrison Street (N/S) and 62nd Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one right turn lane
Southbound:One left turn lane, one through lane, one right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

The intersection of Harrison Street (N/S) and 66th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one right turn lane
Southbound:One left turn lane, one through lane, one right turn lane
Eastbound:One left turn lane, one shared through/right turn lane

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

Westbound:One left turn lane, one shared through/right turn lane

The intersection of Harrison Street (N/S) and 70th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one shared through/right turn lane
Southbound:One left turn lane, one shared through/right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

The intersection of Harrison Street (N/S) and 74th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one right turn lane
Southbound:One left turn lane, one through lane, one right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

The intersection of Harrison Street (N/S) and Pierce Street (E/W) shall provide the following geometrics:

Northbound:One through lane, one right turn lane
Southbound:One left turn lane, one through lane
Eastbound:N/A
Westbound:One left turn lane, one right turn lane

The intersection of SR-86S (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one right turn lane
Southbound:Two left turn lanes, two through lanes, one right turn lane

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

Eastbound:One left turn lane, one through lane, one right turn lane
Westbound:One left turn lane, one through lane, one right turn lane with overlap phasing

NOTE: Signal modification will be necessary to accommodate a second southbound left turn lane, an eastbound right turn lane and a westbound right turn lane with overlap phasing.

The intersection of Paseo Street (NS) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one right turn lane
Southbound:N/A
Eastbound:One through lane, one right turn lane
Westbound:One left turn lane, one through lane

unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 2,818 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of Harrison Street/Village Way (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one right turn lane
Southbound:Two left turn lanes, one shared through/right turn lane
Eastbound:One shared left turn/through lane, one right turn lane
Westbound:Two left turn lanes, one shared through/right turn lane

unless DRP-level or project-level TIAs indicate improvements at this intersection are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 3,478 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of SR-86 (N/S) and Town Center Way North (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one shared through/right turn lane
Southbound:One left turn lane, two through lanes, one right turn lane with overlap
Eastbound:Two left turn lanes, two through lanes, one right turn lane
Westbound:One left turn lane, two through lanes, one right turn lane

unless DRP-level or project-level TIAs indicate improvements at this intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 5,284 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following offsite intersection improvements shall be made. If eligible under any applicable funding programs in effect at the time of implementation, these improvements may qualify for fee credits.

The intersection of Harrison Street (N/S) and 64th Avenue (E/W) shall provide the following geometrics:

Northbound:One shared through/right turn lane
Southbound:One shared left turn/through lane
Eastbound:NA
Westbound:One shared left turn/right turn lane - stop control

The intersection of Harrison Street (N/S) and 72nd Avenue (E/W) shall provide the following geometrics:

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

Northbound:One left turn lane, one shared through/right turn lane
Southbound:One left turn lane, one shared through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

The intersection of Harrison Street (N/S) and 74th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one right turn lane
Southbound:One left turn lane, one through lane, one right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

NOTE: Signal modification will be necessary to accommodate an eastbound left turn lane and a westbound left turn lane.

The intersection of Harrison Street (N/S) and Pierce Street (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one right turn lane
Southbound:One left turn lane, one shared through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

NOTE: Signal modification will be necessary to accommodate a northbound left turn lane.

The intersection of Harrison Street (N/S) and 78th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one right turn lane
Southbound:One left turn lane, two through lanes, one right turn lane
Eastbound:One left turn lane, one shared through/right turn lane

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

Westbound:One left turn lane, one shared through/right turn lane

The intersection of Harrison Street (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, three through lanes, one right turn lane with overlap phasing
Southbound:Two left turn lanes, two through lanes, one shared through/right turn lane
Eastbound:One left turn lane, one through lane, one shared through/right turn lane
Westbound:Two left turn lanes, one through lane, one free-flow right turn lane

NOTE: Signal modification will be necessary to accommodate three northbound through lanes, overlap phasing on the northbound approach, three southbound through lanes, and a westbound right turn lane.

The intersection of Polk Street (N/S) and 74th Avenue (E/W) shall provide the following geometrics:

Northbound:NA
Southbound:One shared left turn/right turn lane - stop control
Eastbound:One shared left turn/through lane
Westbound:One shared through/right turn lane

The intersection of Fillmore Street (N/S) and 78th Avenue (E/W) shall provide the following geometrics:

Northbound:One shared left turn/right turn lane - stop control
Southbound: NA
Eastbound:One shared through/right turn lane
Westbound:One shared left turn/through lane

The intersection of SR-86S (N/S) and 62nd Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one shared through/right turn lane
Southbound:One left turn lane, two through lanes, one

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

shared through/right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

NOTE: Signal modification will be necessary to accommodate three northbound through lanes, three southbound through lanes, an eastbound left turn lane, and a westbound left turn lane.

The intersection of SR-86S (N/S) and 66th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one shared through/right turn lane
Southbound:One left turn lane, two through lanes, one shared through/right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:Two left turn lanes, one shared through/right turn lane

NOTE: Signal modification will be necessary to accommodate three northbound through lanes, three southbound through lanes, an eastbound left turn lane, and two westbound left turn lanes.

The intersection of SR-86S (N/S) and 70th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one shared through/right turn lane
Southbound:One left turn lane, two through lanes, one shared through/right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

The intersection of SR-86S (N/S) and 74th Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one shared through/right turn lane
Southbound:One shared left turn/through lane, one through

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

lane, one shared through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

The intersection of SR-86 (N/S) and Desert Shores Drive (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one right turn lane
Southbound:One left turn lane, two through lanes, one shared through/right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn lane

The intersection of SR-86 (N/S) and Brawley Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one shared through/right turn lane
Southbound:One left turn lane, two through lanes, one right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

The intersection of SR-86 (N/S) and Sea Oasis Boulevard (E/W) shall provide the following geometrics:

Northbound:One shared left turn/through lane, one shared through/right turn lane
Southbound:One left turn lane, one through lane, one shared through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

The intersection of SR-86 (N/S) and Marina Drive (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one through lane, one shared through/right turn lane
Southbound:One left turn lane, one through lane, one shared through/right turn lane
Eastbound:One left turn lane, one shared through/right turn lane
Westbound:One left turn lane, one shared through/right turn

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

lane

The intersection of Village Way (N/S) and 82nd Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes
Southbound:Two through lanes, one right turn lane
Eastbound:One left turn lane, one right turn lane
Westbound:NA

The intersection of Travertine Estates (N/S) and Paseo Street (E/W) shall provide the following geometrics:

Northbound:One shared left turn/through/right turn lane
Southbound:One shared left turn/through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

The intersection of A Street (N/S) and Desert Shores Drive (E/W) shall provide the following geometrics:

Northbound:One shared left turn/through/right turn lane
Southbound:One shared left turn/through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

The intersection of Sea Oasis Drive (N/S) and Travertine Estates (E/W) shall provide the following geometrics:

Northbound:One shared left turn/through lane
Southbound:One shared through/right turn lane
Eastbound:One shared left turn/right turn lane
Westbound:NA

The intersection of Sea Oasis Drive (N/S) and Desert Shores Drive (E/W) shall provide the following geometrics:

Northbound:One shared left turn/through/right turn lane
Southbound:One shared left turn/through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

unless otherwise approved by Imperial County, or unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 5,464 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of Lincoln Street (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one shared through/right turn lane
Southbound:One shared left turn/through/right turn lane
Eastbound:One shared left turn/through/right turn lane
Westbound:One shared left turn/through/right turn lane

unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 5,718 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of SR-86 (N/S) and Town Center Way North (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes
Southbound:One left turn lane, two through lanes, one right turn lane with overlap
Eastbound:Two left turn lanes, one through lane, one right turn lane
Westbound:One left turn lane, one through lane, one right turn lane

unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 5,770 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of SR-86S (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, two through lanes, one shared through/right turn lane
Southbound:Two left turn lanes, three through lanes, one right turn lane
Eastbound:Two left turn lanes, two through lanes, one right turn lane
Westbound:One left turn lane, two through lanes, one right turn lane with overlap phasing

NOTE: Signal modification will be necessary to accommodate three northbound through lanes, three southbound through lanes, two eastbound left turn lanes, two eastbound through lanes, and two westbound through lanes.

unless DRP-level or project-level TIAs indicate improvements at this intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

Prior to the issuance of any certificates of occupancy that would result in more than 8,139 dwelling units in SP00375, or sooner if the need is indicated in DRP-level or project-level TIAs, the following intersection improvements shall be made:

The intersection of Paseo Street (N/S) and 81st Avenue (E/W) shall provide the following geometrics:

Northbound:One left turn lane, one shared left turn/through/right turn lane
Southbound:One left turn lane, one shared through/right turn lane
Eastbound:One left turn lane, one through lane, one right

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.)RECOMMND

turn lane
Westbound:One left turn lane, one shared through/right turn lane

unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

NOTE: Signal modification will be necessary to accommodate a northbound left turn lane, the southbound approach, eastbound left turn and right turn lanes, and the westbound left turn lane.

The intersection of SR-86 Southbound Ramps (N/S) and Town Center Way (E/W) shall provide the following geometrics:

Northbound:NA
Southbound:Two left turn lanes, two right turn lanes
Eastbound:Two through lanes, two right turn lanes
Westbound:Two through lanes, one right turn lane

unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

The intersection of SR-86 Northbound Ramps (N/S) and Town Center Way (E/W) shall provide the following geometrics:

Northbound:Two left turn lanes, one right turn lane
Southbound:NA
Eastbound:Two through lanes, two right turn lanes
Westbound:Two through lanes, two right turn lanes

unless DRP-level or project-level TIAs indicate improvements at one or more intersections are not needed, or fewer lanes are needed, or improvements can be deferred to a later stage of development, subject to approval by the Director of Transportation.

All improvements on Caltrans facilities shall conform to Caltrans design guidelines and shall be subject to Caltrans

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 8 SP - SP375/GEOMETRICS (cont.) (cont.) (cont.) RECOMMND

approval.

All improvements listed are requirements for interim conditions only. Full right-of-way and roadway half sections adjacent to the SP00375 property for the ultimate roadway cross-section per the County's Road Improvement Standards and Specifications must be provided.

All implementing projects within the SP00375 shall be subject to a condition of approval providing that: Any off-site widening required to provide these geometrics shall be the responsibility of the landowner/developer, consistent with Riverside County Ordinance 460 Section 3.2J.

30.TRANS. 9 SP - SP375/PEDESTRIAN PATHS RECOMMND

The project proponent and individual implementing projects within SP00375 shall implement the system of Travertine Point Walkways/Pedestrian Paths as illustrated in Exhibits 3.1-A and 3.1-B of the TSS.

30.TRANS. 10 SP - SP375/BIKEWAYS RECOMMND

The project proponent and individual implementing projects within SP00375 shall implement the system of Travertine Point Bikeways Plan as illustrated in Exhibits 3.2-A and 3.2-B of the TSS.

30.TRANS. 11 SP - SP375/TRANSIT FEATURES RECOMMND

The project proponent and individual implementing projects within SP00375 shall implement the Travertine Point Transit Features as illustrated in Exhibits 4.1-A nd 4.1-B of the TSS.

30.TRANS. 12 SP - SP375/NEV ACCOMMODATIONS RECOMMND

The project proponent and individual implementing projects within SP00375 shall implement the Travertine Point Neighborhood Electrical Vehicle Accommodations as illustrated in Exhibit 6.1-I of the TIA. State legislation will be required to allow NEVs to use roadways that have a speed limit higher than 35 mph. The applicant shall assist the County in obtaining legislative approval.

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30. PRIOR TO ANY PROJECT APPROVAL

30.TRANS. 13 SP - SP375/DRAINAGE STUDIES RECOMMND

Drainage studies will be required for all subsequent development proposals within the boundaries of Specific Plan No. 375 as approved by the Transportation Department.

30.TRANS. 14 SP - SP375/TUMF RECOMMND

Prior to the issuance of a building permit, the applicant shall pay the Transportation Uniform Mitigation Fee (TUMF) in accordance with the fee schedule in effect at the time of issuance, pursuant to Ordinance No. 673.

100. PRIOR TO ISSUE GIVEN BLDG PRMT

PLANNING DEPARTMENT

100.PLANNING. 2 SP - COUNT RES BUILD PERMITS RECOMMND

This condition is applied to assist the Planning Department with tracking the build-out of the SPECIFIC PLAN by automatically counting all the issuance of all new residential building permits on the County's Land Management System which are electronically associated with the Specific Plan. Accordingly, this condition will not allow more than 16650 residential building permits to be issued within the SPECIFIC PLAN.

100.PLANNING. 3 SP -* COUNT RES PRMTS IN DRP RECOMMND

This Condition is applied to assist the Planning Department with tracking the build-out of each DISTRICT within the SPECIFIC PLAN.

Each DISTRICT within the SPECIFIC PLAN shall receive a different development level designation when the DISTRICT REFINEMENT PLAN application is filed. All subsequent implementing projects, including any processed concurrently with the DISTRICT REFINEMENT PLAN shall be attached to the development level designation for the corresponding DISTRICT REFINEMENT PLAN. This condition shall be applied to each DISTRICT REFINEMENT PLAN to automatically count the development of all new residential dwelling units for that DISTRICT on the County's Land Management System. Accordingly, this condition will not allow more than _____ residential dwelling units to be issued within DISTRICT _____.

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 3 SP -* COUNT RES PRMTS IN DRP (cont.) RECOMMND

The total dwelling unit count shall be tracked in a separate spreadsheet by the Planning Director and updated by the applicants for each new project. This is part of the application submittal requirements per the SPECIFIC PLAN.

100.PLANNING. 4 SP - AFFORDABILITY REQ (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 3,133rd building permit within the SPECIFIC PLAN, at least 117 affordable housing units shall have been constructed and operating per the requirements of SPECIFIC PLAN section 3.13.1 subsection 5.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 5 SP - AFFORDABILITY REQ (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 6,658th building permit within the SPECIFIC PLAN, at least 317 affordable housing units shall have been constructed and operating per the requirements of SPECIFIC PLAN section 3.13.1 subsection 5.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 6 SP - AFFORDABILITY REQ (3) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 6 SP - AFFORDABILITY REQ (3) (cont.) RECOMMND

UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 9,628th building permit within the SPECIFIC PLAN, at least 833 affordable housing units shall have been constructed and operating per the requirements of SPECIFIC PLAN section 3.13.1 subsection 5.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 7 SP - AFFORDABILITY REQ (4) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 15,160th building permit within the SPECIFIC PLAN, at least 1,416 affordable housing units shall have been constructed and operating per the requirements of SPECIFIC PLAN section 3.13.1 subsection 5.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 8 SP - AFFORDABILITY REQ (5) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 16,405th building permit within the SPECIFIC PLAN, at least 1,666 affordable housing units shall have been constructed and operating per the requirements of SPECIFIC PLAN section 3.13.1 subsection 5.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 9 SP - NONRES JOBS REQ (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 3,250th building permit within the SPECIFIC PLAN, at least 89,000 square feet of nonresidential development shall have been constructed and occupied per the requirements of SPECIFIC PLAN section 3.13.8 subsection 2. The intent of this condition of approval is to assure that an adequate number of jobs will be provided for the project. Shell buildings, or construction alone shall not satisfy this condition of approval. Planning Department inspection of operating uses within the 89,000 square feet may be required.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 10 SP - NONRES JOBS REQ (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 6,500th building permit within the SPECIFIC PLAN, a cumulative total of at least 529,000 square feet of nonresidential development (an addition of 440,000 square feet over the requirement shown in condition of approval number 100.Planning.9) shall have been constructed and occupied per the requirements of SPECIFIC PLAN section 3.13.8 subsection 2. The intent of this condition of approval is to assure that an adequate number of jobs will be provided for the project. Shell buildings, or construction alone shall not satisfy this condition of approval. Planning Department inspection of operating uses within the additional 440,000 square feet may be required.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 11 SP - NONRES JOBS REQ (3) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 9,500th building permit within the SPECIFIC PLAN, a cumulative total of at least 1,629,500 square feet of nonresidential development (an addition of 1,100,000 square feet over the requirement shown in condition of approval number 100.Planning.10) shall have been constructed and occupied per the requirements of SPECIFIC PLAN section 3.13.8 subsection 2. The intent of this condition of approval is to assure that an adequate number of jobs will be provided for the project. Shell buildings, or construction alone shall not satisfy this condition of approval. Planning Department inspection of operating uses within the additional 1,100,000 square feet may be required.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 12 SP - NONRES JOBS REQ (4) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 13,500th building permit within the SPECIFIC PLAN, a cumulative total of at least 4,029,500 square feet of nonresidential development (an addition of 2,400,000 square feet over the requirement shown in condition of approval number 100.Planning.11) shall have been constructed and occupied per the requirements of SPECIFIC PLAN section 3.13.8 subsection 2. The intent of this condition of approval is to assure that an adequate number of jobs will be provided for the project. Shell buildings, or construction alone shall not satisfy this condition of approval. Planning Department inspection of operating uses within the additional 2,400,000 square feet may be required.

To track total dwelling unit counts see condition

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 12 SP - NONRES JOBS REQ (4) (cont.) RECOMMND

"10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 13 SP - NONRES JOBS REQ (5) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 15,000th building permit within the SPECIFIC PLAN, a cumulative total of at least 5,029,500 square feet of nonresidential development (an addition of 1,000,000 square feet over the requirement shown in condition of approval number 100.Planning.12) shall have been constructed and occupied per the requirements of SPECIFIC PLAN section 3.13.8 subsection 2. The intent of this condition of approval is to assure that an adequate number of jobs will be provided for the project. Shell buildings, or construction alone shall not satisfy this condition of approval. Planning Department inspection of operating uses within the additional 1,000,000 square feet may be required.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 14 SP - FIRE STATIION REQ (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 2,000th building permit within the SPECIFIC PLAN, or to the satisfaction of the RCFD, a fire station for the RCFD within the Riverside County portion of the proposed project shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 15 SP - FIRE STATION REQ (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 4,000th building permit within the SPECIFIC PLAN, or to the satisfaction of the RCFD, a second fire station for the RCFD within the Riverside County portion of the proposed project shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 16 SP - SHERIFF STATION REQ (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 3,249th building permit within the SPECIFIC PLAN, or to the satisfaction of the RCSD, a sheriff's substation for the RCSD within the Riverside County portion of the proposed project shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 17 SP - SHERIFF STATION REQ (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 6,857th building permit within the SPECIFIC PLAN, or to the satisfaction of the RCSD, a second sheriff's substation for the RCSD within the Riverside County portion of the proposed project shall be constructed and operating.

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 17 SP - SHERIFF STATION REQ (2) (cont.) RECOMMND

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 18 SP - PARK PLANS REQ (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 2,250th building permit within the SPECIFIC PLAN, detailed plans for a minimum of 43 additional acres of park (representing 5 acres per thousand) shall be approved by the Planning Department. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 19 SP - PARK CONST (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 3,250th building permit within the SPECIFIC PLAN a minimum of 43 acres of park land shall be constructed and opened.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 20 SP - PARK PLANS REQ (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 5,500th building permit within

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 20 SP - PARK PLANS REQ (2) (cont.) RECOMMND

the SPECIFIC PLAN, detailed plans for a minimum of 48 additional acres of park (for a total of 91 acres representing 5 acres per thousand) shall be approved by the Planning Department. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 21 SP - PARK CONST (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 6,500th building permit within the SPECIFIC PLAN, detailed plans for a minimum of 48 additional acres of park (for a total of 91 acres representing 5 acres per thousand) shall be approved by the Planning Department. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 22 SP - PARK PLANS REQ (3) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 9,000th building permit within the SPECIFIC PLAN, detailed plans for a minimum of 47 additional acres of park (for a total of 138 acres representing 5 acres per thousand) shall be approved by the Planning Department. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 22 SP - PARK PLANS REQ (3) (cont.) RECOMMND

"10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 23 SP - PARK CONST (3) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 10,000th building permit within the SPECIFIC PLAN a minimum of 47 acres of park land (for a total of 138 acres) shall be constructed and opened.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 24 SP - PARK PLANS REQ (4) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 12,500th building permit within the SPECIFIC PLAN, detailed plans for a minimum of 68 additional acres of park (for a total of 206 acres representing 5 acres per thousand) shall be approved by the Planning Department. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 25 SP - PARK CONST (4) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 13,500th building permit within the SPECIFIC PLAN a minimum of 68 acres of park land

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 25 SP - PARK CONST (4) (cont.) RECOMMND

(for a total of 206 acres) shall be constructed and opened.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 26 SP - LIBRARY PLANS REQ (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 2,500th building permit within the SPECIFIC PLAN, detailed plans for an estimated 5,000-square-foot library facility shall be approved by the Planning Department in coordination with the Riverside County Library System. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 27 SP - LIBRARY CONST (1) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 3,500th building permit within the SPECIFIC PLAN for an estimated 5,000-square-foot library facility shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 28 SP - LIBRARY PLANS REQ (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 28 SP - LIBRARY PLANS REQ (2) (cont.) RECOMMND

PRIOR TO THE ISSUANCE OF THE 6,000th building permit within the SPECIFIC PLAN, detailed plans for an estimated 5,000-square-foot library facility (in addition to library space previously required) shall be approved by the Planning Department in coordination with the Riverside County Library System. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 29 SP - LIBRARY CONST (2) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 7,000th building permit within the SPECIFIC PLAN for an estimated 5,000-square-foot library facility (in addition to library space previously required) shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 30 SP - LIBRARY PLANS REQ (3) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 9,500th building permit within the SPECIFIC PLAN, detailed plans for an estimated 5,000-square-foot library facility (in addition to library space previously required) shall be approved by the Planning Department in coordination with the Riverside County Library System. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 30 SP - LIBRARY PLANS REQ (3) (cont.) RECOMMND

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 31 SP - LIBRARY CONST (3) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 10,500th building permit within the SPECIFIC PLAN an estimated 5,000-square-foot library facility (in addition to library space previously required) shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 32 SP - LIBRARY PLANS REQ (5) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 13,000th building permit within the SPECIFIC PLAN, detailed plans for an estimated 5,000-square-foot library facility (in addition to library space previously required) shall be approved by the Planning Department in coordination with the Riverside County Library System. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

This last library may be in Imperial County as opposed to Riverside County. The Plans shall be coordinated with the Riverside County Library System and/or the Imperial County Free Library System. The applicant shall execute a joint Memorandum of Understanding with both the Riverside County Library System and Imperial County Free Library System that provides for the location of this library site in either Riverside or Imperial County and that this library will provide services to both systems. Regardless of the location of this library, the applicant shall participate

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 32 SP - LIBRARY PLANS REQ (5) (cont.) RECOMMND

in development fees for library services as required by each County. In the event that the library is located in Imperial County, this condition of approval shall be set to NOT APPLY.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 33 SP - LIBRARY CONST (5) RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 14,000th building permit within the SPECIFIC PLAN an estimated 5,000-square-foot library facility (in addition to library space previously required) shall be constructed and operating. This structure may, alternatively, be located in Imperial County in which case this condition of approval shall be set to NOT APPLY.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 34 SP - URGENT CARE PLANS REQ RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 1,500th building permit within the SPECIFIC PLAN, detailed plans for an urgent care medical facility within the Travertine Point Specific Plan area shall be approved by the Planning Department. All designs shall substantially conform to the design criteria as specified in the DISTRICT REFINEMENT PLAN for the respective DISTRICT.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 35 SP - URGENT CARE CONST RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 2,500th building permit within the SPECIFIC PLAN an urgent care medical facility shall be constructed and operating.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 37 SP - HOSPITAL SITE RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

PRIOR TO THE ISSUANCE OF THE 5,000th building permit within the SPECIFIC PLAN, a site for a hospital within the Travertine Point Specific Plan area or other nearby location acceptable to the Planning Director shall be identified and approved by the Planning Department. The development of such site shall be subject to an agreement with a health care provider to construct and operate a hospital at such time as a provider determines there is sufficient need to make the construction and operation of a hospital financially feasible. The design shall substantially conform to the design criteria as specified in the district refinement plan for the respective district.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

100.PLANNING. 38 SP - HOSPITAL CONST RECOMMND

Whenever a condition of approval uses the term "building permit" to trigger an event or to cause another action to take place, the condition shall be interpreted to mean "Dwelling Units" as enumerated within the TOTAL DWELLING UNIT TRACKING MATRIX.

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100. PRIOR TO ISSUE GIVEN BLDG PRMT

100.PLANNING. 38 SP - HOSPITAL CONST (cont.) RECOMMND

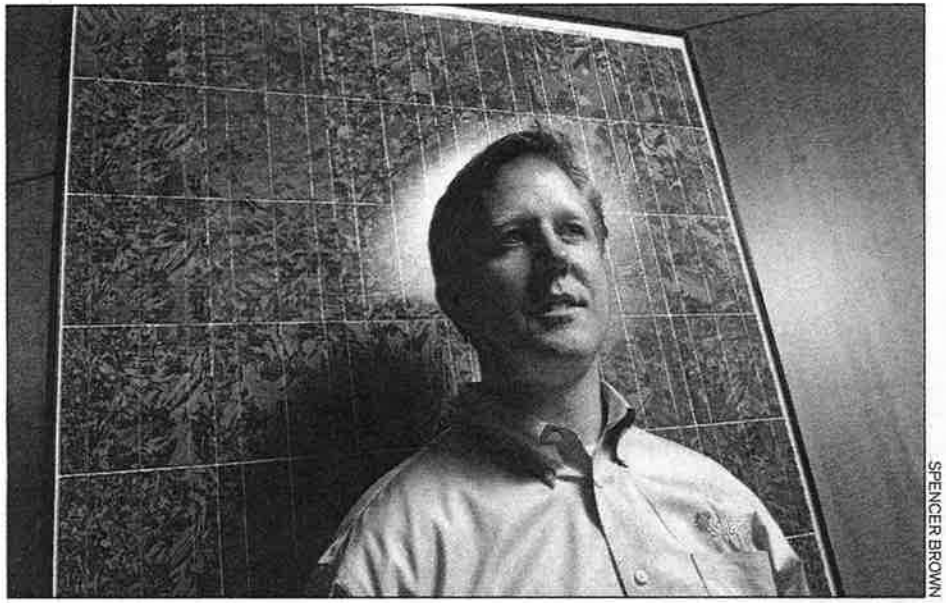
PRIOR TO THE ISSUANCE OF THE 15,000th building permit within the SPECIFIC PLAN a structure for a hospital shall be constructed and operational.

To track total dwelling unit counts see condition "10.Planning.58 DU/BUILDING PERMIT MATRIX."

EXHIBIT N

Zero-net-energy homes: More feasible, still rare

BY BLANCA TORRES
San Francisco Business Times



SPENCER BROWN

Solar City's Walter Cuculic says buyers have a choice about where to buy electricity.

California lawmakers set an ambitious goal to have all new homes achieve zero net energy use by 2020. With less than a decade to go, homebuilders have a lot of catching up to do.

So far, only one developer, Shea Homes, offers its "no-electric-bill home" model through its SheaXero brand — which it launched last year, but only in communities aimed at retirees.

The technology to make homes generate more energy than they consume has been available for years. While many homebuilders boast of energy-efficient homes or solar panels as an option, getting down to zero net energy is still rare. That may change very quickly thanks to a drop in the cost of solar panels as well as growing consumer demand.

For Shea, the goal was to help the environment, but more importantly to reduce energy bills for its buyers who tend to live on fixed incomes and want to live in sustainable homes.

"Yes, (zero net energy) increases the costs for the homebuilder, but you're saving money over time," said Jason Enos, general manager for Shea Homes. "Sometime in the future, solar will be a standard feature like a microwave or air conditioning."

Shea started offering the Xero homes in early 2012 in California, Washington, Arizona, Nevada and Florida, and has sold close to 1,000 units. In the Bay Area, Shea builds those models at its Trilogy development in Brentwood in east Contra Costa County that is restricted to homeowners age 55 and older.

The homes were designed to cut energy usage while generating energy, mostly via solar panels.

Shea spent more than a year researching how its homes could achieve zero net energy, which Enos said cost about 10 to 12 percent more to produce. Shea buyers won't notice a difference in price for a Xero home, Enos said, but will save hundreds of dollars per year on energy. In the Bay Area, buyers pay a connection fee to Pacific Gas & Electric, about $4 per month or $48 a year.

To develop its Xero line, Shea partnered with San Mateo-based SolarCity, a provider of clean energy services.

Walter Cuculic, national manager of SolarCity's homebuilding program, said the company has worked with numerous owners of custom homes to achieve zero net energy, but Shea was the first large-scale builder. The company is now developing similar programs for other builders such as Toll Brothers, Pulte Homes, Del Webb Corp. and Taylor Morrison. Shea has launched its Xero brand in 10 communities and plans six more this year.

"(Zero net energy homes) are truly giving the homebuyer more choice about where you buy power," Cuculic said. "You're either going to buy it from the builder or the utility. It's about who provides the better price for the energy."

Cuculic is surprised it has taken so long for zero-net-energy homes to gain traction with homebuilders, especially with California and the U.S. Department of Energy calling for all new homes to reach zero net energy by 2030.

Solar prices have come down. "It's much more feasible than people thought," to reach those goals, Cuculic said. "If you can incorporate (zero net energy) into new construction, the cost is much lower than retrofitting existing homes."

In Vermont, a company called Vantem just rolled out its Smarthouze line of homes built in a factory and assembled onsite that are designed to achieve zero net energy. The company produced energy-efficient insulation and walls before shifting toward complete homes — a move that attracted an investment from Transformative Energy and Materials Capital LLC.

Roger Berry, a partner with the investor, said zero-net-energy homes will do for home building what the Toyota Prius did for cars — turning a luxury or cost-prohibitive technology into an industry standard.

"(We) feel that a real paradigm shift is needed ... to get all the way to zero energy," Berry said. "Halfway steps in this market don't reallly change consumer behavior in fundamental ways."

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Polaris predicted the resurgence of condo market

EXHIBIT O

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Traffic noise reduction in Europe

Health effects, social costs and technical and policy options to reduce road and rail traffic noise

Report

Delft, August 2007

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Publication Data

Bibliographical data:
L.C. (Eelco) den Boer, A. (Arno) Schroten
Traffic noise reduction in Europe
CE Delft, March 2007

Traffic / Noise / Reduction / Health / Effects / Costs / Technology / Policy / Road / Railways /

Publication code: 07.4451.27

CE Delft publications are available from www.ce.nl

Commissioned by: T&E Brussels

For further information on this study, contact Eelco den Boer at CE.

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Preface

Millions of people in Europe are affected by transport noise. Transport noise annoys people, causes stress and illness and may sometimes even have a fatal impact. As a result, noise is very costly to society.

There are numerous cheap and relatively easy ways to reduce transport noise significantly. First of all, noise should be taken as seriously as other forms of pollution, as it is similarly damaging to human health. This year, 2007, is an important one for the future of noise policy. The European Commission is presenting a proposal for tightening car tyre noise emission limits, and in June 2007 the first noise maps of large agglomerations, main roads and railways were to be submitted to the Commission under the terms of the Environmental noise directive.

This reports describes the health effects of rail and road transport noise and presents a number of recommendations as to how to address them.

We would like to kindly thank the people who reviewed this report for their contributions. The comments of Rokho Kim of the WHO and Tor Kihlman of the Chalmers Institute of Technology were especially helpful in improving the overall quality of the report. We also thank Nigel Harle for his careful editing of the English.

Eelco den Boer
Arno Schroten

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Summary

The main conclusions of this report are as follows:

Health effects and social costs

- Traffic noise has a variety of adverse impacts on human health. Community noise, including traffic noise, is already recognised as a serious public health problem by the World Health Organization, WHO.
- Of all the adverse effects of traffic noise the most widespread is simply annoyance.
- There is also substantial evidence for traffic noise disturbing sleep patterns, affecting cognitive functioning (especially in children) and contributing to certain cardiovascular diseases. For raised blood pressure, the evidence is increasing. For mental illness, however, the evidence is still only limited.
- The health effects of noise are not distributed uniformly across society, with vulnerable groups like children, the elderly, the sick and the poor suffering most.
- In 2000, more than 44% of the EU25[1] population (about 210 million people) were regularly exposed to over 55 dB of road traffic noise, a level potentially dangerous to health. In addition, 35 million people in the EU25 (about 7%) are exposed to rail traffic noise above 55 dB. Millions of people indeed experience health effects due to traffic noise. For example, about 57 million people are annoyed by road traffic noise, 42% of them seriously.
- A preliminary analysis shows that each year over 245,000 people in the EU25 are affected by cardiovascular diseases that can be traced to traffic noise. About 20% of these people (almost 50,000) suffer a lethal heart attack, thereby dying prematurely.
- The annual health loss due to traffic noise increased between 1980 and 2000 and is expected to increase up to 2020. In contrast, traffic safety has improved, following implementation of a variety of policy measures.
- At a conservative estimate, the social costs of traffic noise in the EU22[2] amount to at least € 40 billion per year (0.4% of total GDP). The bulk of these costs (about 90%) are caused by passenger cars and lorries.

Noise reduction options

- If noise-related problems are to be alleviated, they must be the subject of greater political focus. Vehicle noise emission limits have not been technology-forcing since their introduction and were last tightened in 1995. This means these limits have not been updated for twelve years, in stark contrast to vehicle air pollution emission standards, which have been tightened three times over the same period.
- Consequently, there has been no reduction in community exposure to noise. This is due to the lax limits in the EU Motor vehicle sound emission directive

[1] EU25 refers to EU27 except Cyprus and Malta.

[2] EU22 refers to EU27 except Cyprus, Estonia, Latvia, Lithuania and Malta.

and the Tyre/road directive, the fact that changes in test conditions have in practice led to even weaker limits, and increased traffic volumes.

- There is plenty of scope for reducing ambient noise levels by at least 3-4 dB(A) in the short term using currently available technology. Beyond 2012, year-on-year improvement targets (x dB(A) every y years) should be introduced, outlined well in advance to give industry time to adapt.
- In the case of both road and rail traffic, there are already vehicles/rolling stock available that are well within current noise standards. Besides the vehicles themselves, examples of silent tyres/wheels and road pavements/tracks show also room for noise reduction. At noise hotspots additional, local measures can be implemented.
- The most cost-effective measures are those addressing the noise at-source. This includes noise from the engine, exhaust, mechanical systems and contact between tyres and road, or wheels and track. The associated costs are generally limited, for vehicles and tyres at least. There are signs that use of composite brake blocks on rail wagons also comes at a modest cost.
- Although an optimal noise control regime will always be a mix of local and at-source measures, the Commission should take responsibility for ensuring that the noise emissions of cars, tyres and railways are reduced significantly. These are the most cost-effective measures and their impact will be felt across Europe.
- When it comes to tightening noise standards and improving test procedures, prolonged discussions and political procedures are costing Europe dearly. If the EU does not come up with better policies soon, local measures will need to be taken, which are considerably more expensive than measures taken across the EU.

1 Introduction

Noise pollution consistently ranks high on the list of citizens concerns. It is estimated that over half of Europe s population is exposed to unacceptable noise levels. Noise from road transport is the major source, followed by aircraft and railway noise. In its 6th Environmental Action Programme (2002-2012) the EU has set itself the objective of substantially reducing the number of people regularly affected by long-term average levels of noise. The aim of reducing noise exposure to acceptable levels has been repeated in the renewed Sustainable Development Strategy as well as in the transport White paper and its mid-term review. Despite all efforts in this direction, however, EU policy does not seem to recognise that noise is first and foremost a major environmental health issue.

Vehicle noise regulation is important, especially in light of growing traffic volumes and the proximity between transport infrastructure and residential and living areas. Every doubling of transport intensity increases noise levels by 3 dB(A). Vehicle noise regulation goes back to the 1970s, with tyre/road noise regulation added in 2001 and thereafter. In their present form, however, both sets of legislation are too liberal to have had any significant effect and the number of people exposed to ambient noise has consequently increased rather than declined.

This report highlights the scale and scope of the traffic noise problem, which affects a very substantial proportion of the European populace. It serves as a background report to a T&E brochure and is based on a thorough literature review. The report covers health effects and social costs, and reviews noise reduction policies and measures to reduce noise exposure. In conclusion, a number of recommendations for action are given. The report focuses on road and rail transport.

2 The health effects of traffic noise

In this chapter we first discuss the health impact of traffic noise, describing the various effects signalled and discussing the scientific evidence for each. We then report on the number of people exposed to traffic noise and the number likely to be affected by the respective health effects. Finally, we briefly review the evidence for traffic noise having an impact on animals and ecosystems.

2.1 WHO Community Noise Guidelines

Traffic is the most widespread source of environmental noise. Exposure to traffic noise is associated with a wide range of effects on human health and well-being. The World Health Organisation (WHO) recognises community noise, including traffic noise, as a serious public health problem, prompting it to publish guidelines on community noise in 1999 (Berglund et al., 1999). These guidelines present noise levels above which a significant impact on human health and/or well-being is to be expected. In 2007 an extension of the guidelines was published (WHO, 2007), focusing on the health impacts of night-time noise. Table 1 presents the relevant guideline values for specific environments. When multiple adverse health effects are identified for a given environment, the guideline values are set at the level of the lowest adverse health effect (the critical health effect).

Table 1 Selected values from the WHO Community Noise Guidelines and WHO Night Noise Guidelines

Specific environment	Critical health effect	Day: L_{Aeq} (dB(A)) Night: L_{night} (dB(A))	Time base (hours)
Day-time and evening noise			
Outdoor living area	Serious annoyance, daytime and evening Moderate annoyance, daytime and evening	55 50	16 16
Dwellings, indoor	Speech intelligibility and moderate annoyance, daytime and evening	35	16
School class rooms, and pre-schools, indoors	Speech intelligibility, disturbance of information extraction, message communication	35	During class
School playground, outdoor	Annoyance	55	During play
Hospital ward rooms, indoors	Sleep disturbance, daytime and evenings	30	16
Hospital, treatment rooms, indoors	Interference with rest and recovery	a	
Night-time noise			
At the façade, outside	Body movements, awakening, self-reported sleep disturbance	30	During the night

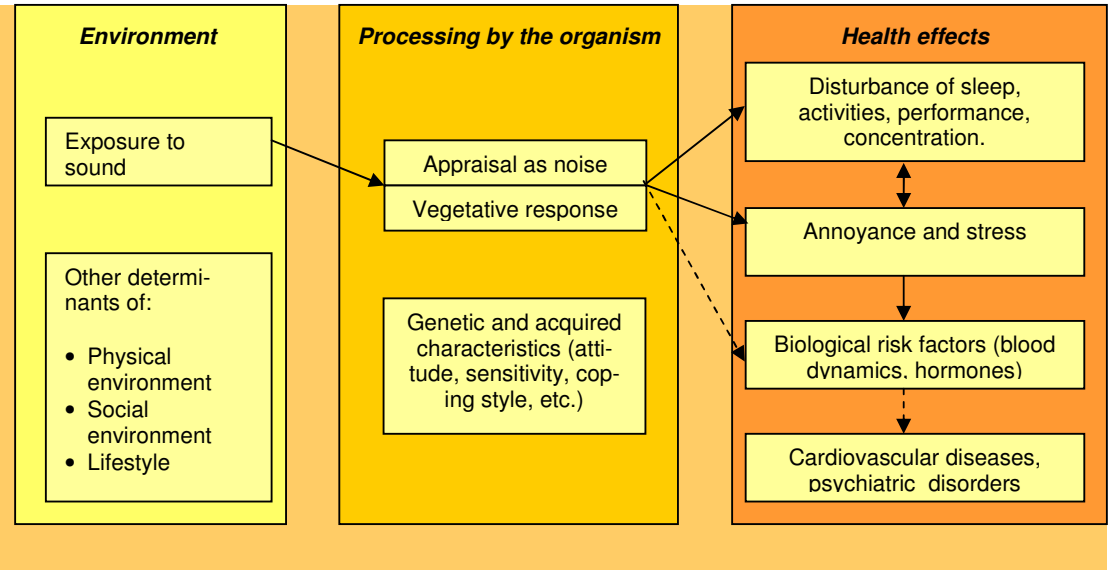
[a] As low as possible.

2.2 The relation between noise and human health

Traffic noise frequently exceeds the guideline values published by the WHO and those exposed to traffic noise consequently suffer an array of adverse health effects. These include socio-psychological responses like annoyance and sleep disturbance, and physiological effects such as cardiovascular diseases (heart and circulatory problems) and impacts on mental health (RIVM, 2004). In addition, traffic noise may also affect children s learning progress. Finally, prolonged, cumulative exposure to noise levels above 70 dB(A), common along major roads, may lead to irreversible loss of hearing (Rosenhall et al., 1990).

Figure 1 summarises the potential mechanisms of noise-induced health effects and their interactions. In the first place, noise exposure can lead to disturbance of sleep and daily activities, to annoyance and to stress. This stress can in turn trigger the production of certain hormones (e.g. cortisol, noradrenalin and adrenaline), which may lead to a variety of intermediate effects, including increased blood pressure. Over a prolonged period of exposure these effects may in their turn increase the risk of cardiovascular disease and psychiatric disorders. The degree to which noise leads to disturbance, annoyance and stress depends partly on individual characteristics, in particular a person s attitude and sensitivity to noise. Finally, the relation between noise and personal health and well-being is also influenced by external factors like physical and social environment and lifestyle.

Figure 1 The mechanisms of noise-induced health effects



Source: HCN (Health Council of the Netherlands), 1999.

2.3 Review of health effects

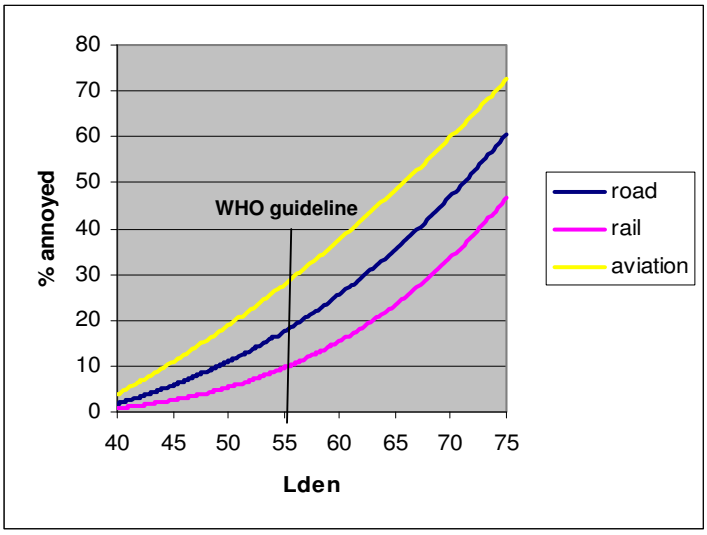
From Figure 1 and the discussion thus far we can identify the following potential health effects due to exposure to traffic noise:

- Annoyance.
- Sleep disturbance.
- Disturbed cognitive functioning (learning and understanding).
- Cardiovascular disease.
- Adverse effects on mental health.

2.3.1 Annoyance

The most widespread problem created by noise is quite simply annoyance. Annoyance can be defined as a general feeling of displeasure or adverse reaction triggered by the noise. Among the ways it can express itself are fear, uncertainty and mild anger (Stansfeld & Matheson, 2003; RIVM, 2005). In the human environment (which also includes neighbours, industry, etc.) traffic is the single most important source of noise annoyance (Niemann & Maschke, 2004; RIVM, 2004). As Figure 2 shows, aircraft noise is perceived as more annoying than road and rail traffic noise at the same volume. At a noise level of 55 dB(A), the guideline limit set by the WHO, approximately 30% of those exposed are annoyed by aircraft noise, about 20% by road traffic noise and about 10% by rail traffic noise. Some people begin to experience annoyance at traffic noise from noise levels of 40 dB(A) upwards.

Figure 2 Percentage of people annoyed as a function of noise exposure of dwellings (Lden in dB(A))



Source: Miedema & Oudshoorn (2001).

The degree of annoyance triggered by traffic noise is determined first of all by the noise level. The higher the level, the more people are annoyed and the greater the severity of perceived annoyance (Ellebjerg Larsen et al., 2002; RIVM, 2005).

The degree of annoyance depends on other noise characteristics, too (London Health Commission, 2003). The higher the pitch of the noise, the greater the annoyance. Duration and intermittency also influence the degree of annoyance.

However, traffic noise-induced annoyance is governed by more than just acoustic factors, with personal and situational factors also coming into play, as well as a person s relationship to the source of the noise. In a familiar illustration, a mosquito may not make much of a noise, but during the night it can cause considerable annoyance. Feelings of annoyance depend in the first place on an individual s sensitivity to noise (Ouis, 2001; RIVM, 2004). The fact that noise is a form of harm that can be avoided contributes to people s perception of noise as annoyance (London Health Commission, 2003). Another important determinant of perceived annoyance is fear of the noise s source (RIVM, 2004). People who feel they have no control over the situation, or believe authorities are failing to control it, are likely to experience a greater level of annoyance. Annoyance at noise depends also on how the noise interferes with everyday life (London Health Commission, 2003; Stansfeld & Matheson, 2003). People will be more annoyed when noise affects activities that involve talking and listening, such as conversations, listening to music, watching television and so on. Finally, noise in situations where it is expected is less annoying than noise in circumstances anticipated to be quiet. For this reason noise at night-time (the buzzing of a mosquito, as cited, but also traffic noise) is more annoying than during the day.

To some extent, people frequently exposed to traffic noise develop strategies of adapting and coping with the problem (London Health Commission, 2003). The problem still remains, however: subconscious physical reactions, such as raised blood pressure, and levels of annoyance due to chronic noise will not diminish over time unless the noise itself is abated.

2.3.2 Sleep disturbance

Traffic noise is the main cause of sleep disturbance (Niemann & Maschke, 2004). This effect of noise on sleep has important health effects, since uninterrupted sleep is known to be a prerequisite for proper physiological and mental functioning in healthy people (WHO, 2007). Three types of effects of noise on sleep can be distinguished: effects on sleeping behaviour (primary effects), effects on performance and mood through the following day (secondary effects) and long-term effects on well-being and health:

- *Sleeping behaviour*. Night-time noise can increase the arousal of the human body, i.e. lead to activation of the nervous system, which may result in a person awakening or prevent them from falling asleep (Ising et al., 2004; TNO Inro, 2002; WHO, 2007). However, this arousal response to noise is often more subtle than mere awakening and may involve a change from a deeper to lighter sleep, an increase in body movements, a temporary increase in heart rate and changes in (stress) hormone levels (RVIM, 2003; HCN, 2004; WHO, 2007). Finally, there is also some evidence that blood pressure is affected by traffic noise during sleep (WHO, 2007).

- *Effects on performance and mood through the following day.* The secondary effects of sleep disturbance include reduced perceived sleep quality and increased drowsiness, tiredness and irritability (HCN, 2004). While there are also indications of other effects such as depressed mood and decreased performance (Ouis, 2001), the available evidence is still inconclusive (HCN, 2004; WHO, 2007).
- *Long-term effects on well-being.* In the long-term, night-time noise can lead to insomnia and increased medication use (HCN, 2004; WHO, 2007). It may also result in chronic annoyance (Berglund et al., 1999; RIVM, 2004). Furthermore, an increased risk of cardiovascular disease due to night-time noise is plausible, although there is only limited evidence for this effect (TNO Inro, 2002; WHO, 2007). Finally, there are certain indications that night-time noise can contribute to mental illness (WHO, 2007)

The effects of night-time traffic noise on sleep disturbance begin at fairly low volumes and become more likely as the intensity of the noise increases. Changes between sleep stages, increased body movements and heart-rate acceleration start at noise levels around 32-42 dB(A) (WHO, 2007). In addition, reported sleep quality is likely to be affected at noise levels above 40 dB(A) (RIVM, 2004; Ising et al., 2004; WHO, 2007). Night-time awakenings also start at levels above 40 dB(A) (WHO, 2007). However, sleep disturbance is influenced by other noise characteristics, too. People are far more sensitive to intermittent noise than continuous noise (Prasher, 2003). For example, an accelerating car will disturb a person s sleep more than a continuous traffic flow. In addition, the alarm function of the sense of hearing may lead to awakening if the noise contains information perceived to be of relevance, even if the noise level is low. This means that unfamiliar noises are far more likely to disturb sleep than familiar, regular patterns of noise. Finally, personal characteristics like noise sensitivity influence the relation between night-time noise and sleep disturbances (Ouis, 2001).

People are good at adapting to nocturnal noise. However, there is never complete habituation, particularly with respect to heart-rate acceleration (Stansfeld & Matheson, 2003; WHO, 2007).

2.3.3 Impaired cognitive functioning

Exposure to traffic noise can impair an adult s cognitive functioning (information processing, understanding and learning) (Stansfeld & Matheson, 2003). To have this effect, though, noise levels must be high, or the task complex or cognitively demanding (Prasher, 2003). Repetitive and simple tasks are unaffected by (traffic) noise. The influence of noise on cognitive functioning depends on a person s perceived control of the noise and its predictability.

In the literature there is a prominent focus on the influence of traffic noise on the cognitive functioning of children. Although most of the studies are concerned with the impact of aircraft noise in this respect, some of them consider road and rail traffic noise, too. According to Bistrup et al. (2001), the adverse effects of road traffic noise exceed those of rail traffic noise.

In general, the following effects have been found for children exposed to high levels of traffic noise (Bistrup et al., 2001; Clark et al., 2005; RIVM, 2005):

- Difficulty sustaining attention.
- Difficulty concentrating.
- Poorer discrimination between sounds and poorer perception of speech.
- Difficulty remembering, especially complex issues.
- Poorer reading ability and school performance.

A hypothesis frequently stated to explain the impact of chronic exposure to noise on the cognitive development of children is that noise affects the intelligibility of speech communication (Bistrup et al., 2001; RIVM, 2005). Ambient noise leads to a loss in the content of a teacher s instruction, and consequently children may have problems with speech perception and language acquisition. This, in turn, can lead to impairment of children s reading skills and vocabulary, and eventually to difficulties with other, higher-level processes, such as long-term memory for complex issues. Closely related to this process is the so-called tuning out response: to adapt to noise interferences during activities, children filter out the unwanted noise stimuli (RIVM, 2005). However, researchers suggest that children generalise this strategy to other situations where noise is not present, with adverse effects on their understanding and learning performance.

Although there has been little research into the impact of noise reduction in this context, there is evidence that reduced noise levels can relieve cognitive problems within about a year (London Health Commission, 2003).

2.3.4 Cardiovascular disease

Exposure to traffic noise is associated with changes in blood pressure and increased risk of various types of heart disease (e.g. ischemic heart diseases, angina pectoris, myocardial infraction). Noise-induced cardiovascular diseases are considered to be the consequence of stress (Babisch, 2006; Ising et al., 2004; Prasher, 2003; RIVM, 2004). Exposure to noise triggers the production of (stress) hormones like cortisol, noradrenaline and adrenaline. It does so both directly and indirectly, through disturbance of activities. These hormones may cause changes in the values of a number of biological risk factors, such as hypertension (high blood pressure), blood lipids (e.g. cholesterol) and blood glucose. These risk factors can increase the risk of cardiovascular disease (Babisch, 2006; Ising et al., 2004). Persistent exposure to environmental noise could therefore result in permanent changes to the vascular system, with elevated blood pressure and heart diseases as potential outcomes. The magnitude of these effects will be partly determined by individual characteristics, lifestyle behaviours and environmental conditions (Berglund et al., 1999).

Sufficient evidence can be found in the literature for the relation between traffic noise and heart diseases like myocardial infarction and ischemic heart diseases (Babisch, 2006; Babisch et al., 2005; Ising et al., 2004; Prasher, 2003). Higher risks of heart disease are found for those living in streets with average noise levels above 65-70 dB(A). For these people the risk of heart disease is approximately 20% higher than for those living in quieter areas (Babisch, 2006). This risk

increases with noise level. Again, the risk is also influenced by personal characteristics. For example, Babisch et al. (2005) found that only men are at higher risk of heart attack due to traffic noise. This risk is also dependent on the number of years of exposure to the traffic noise, moreover. The longer people are exposed to a high level of traffic noise, the greater the likelihood of it having an impact and increasing the risk of a heart attack.

There is a growing body of evidence for a higher risk of hypertension in people exposed to high levels of traffic noise (Babisch, 2006). For example, a recent study by Bluhm et al. (2006) suggests the existence of a relation between residential exposure to road traffic noise and hypertension. However, earlier studies (e.g. Babisch, 1998; RIVM, 2005) show less evidence for this relationship, and according to Babisch (2006) these studies cannot be neglected in the overall judgement process. Hence more research into the relation between traffic noise and hypertension is needed.

There has been hardly any research into the impact of night-time noise exposure on cardiovascular health outcomes (Babisch, 2006). One exception is UBA (2003), who showed that night-time noise exposure was more strongly associated with medical treatment for hypertension than day-time noise exposure.

In contrast to the subjective perception of noise, which adapts within a few days through habituation (see paragraph 2.3.1), none of the cardiovascular diseases show habituation to noise after prolonged exposure (WHO, 2007).

2.3.5 Mental illness

A small number of studies have presented limited evidence for a link between traffic noise and mental illness (Prasher, 2003; Stansfeld & Matheson, 2003; WHO, 2007). The clear association between noise and annoyance does not necessarily translate into a more serious relationship with mental health (London Health Commission, 2003). However, noise may well accelerate and intensify the development of latent mental disorder. Even so, people already suffering mental problems are likely to be more sensitive to being annoyed or disturbed by traffic noise than the general population.

2.4 Traffic noise especially harmful to vulnerable groups

The health effects of road and rail traffic noise are not distributed uniformly across society, with vulnerable groups like children, the elderly and the sick affected most. In addition, poorer people are more likely to suffer the health effects of transport noise than the better off. This might be explained by lower quality housing with poor noise insulation and the proximity of housing for lower income groups to noisy transport infrastructure.

Children are likely to be a group that is particularly vulnerable to the health effects of noise. They have less cognitive capacity to understand and anticipate it and lack well-developed coping strategies (Stansfeld & Matheson, 2003). As

children are still developing both physically and cognitively, moreover, in this group there is a potential risk of chronic noise having irreversible negative consequences. The impact of traffic noise on children s cognitive development has already been briefly discussed. Noise may also possibly affect foetal development, by way of (stress) effects on expectant mothers (EPA, 1978). However, a more recent study questions this impact on foetal development, although such effects are not completely ruled out (Bistrup et al., 2001). Additionally, children do not appear to be at particular risk with respect to cardiovascular disease, especially through high blood pressure (Babisch, 2006). At the same time, though, traffic noise exposure from an early age may have cumulative health effects in later life, which once more include cardiovascular disease. This also holds for the negative effects of sleep disturbance. In the short term, however, children are less severely affected by sleep disturbance than adults (RIVM, 2004), as evidenced by fewer awakenings and changes between sleep stages. With respect to annoyance due to traffic noise, finally, children do not differ from adults.

The elderly and the sick are two other groups that may be especially vulnerable to the effects of traffic noise. There has not been much research into this area, however. One of the rare findings is that both the elderly and those already ill are more affected by sleep disturbance - especially awakenings - than the general population (HCN, 2004; Ouis, 2001). Also, those already suffering from sleep disturbance are more severely affected by traffic noise. With regard to cardiovascular disease, Babisch (2006) shows that people with prevalent chronic diseases have a slightly higher probability of contracting certain heart diseases as a result of traffic noise than those without. For the elderly, there is no consistent evidence that the effect of traffic noise on cardiovascular diseases is greater than for younger people. Finally, traffic noise may aggravate the psychological problems of people with existing health problems (London Health Commission, 2003).

The price of houses exposed to high levels of traffic noise will be lower than that of similar houses in quieter areas (Soguel, 1994; Theebe, 2004). Those living on lower household incomes are therefore more likely to be exposed to traffic noise than those with higher incomes, and will hence have more noise-related health problems. For the Dutch region Rijnmond this relationship between household income and exposure to noise was confirmed by RIVM (2004).

2.5 Over 210 million in EU25 exposed to harmful traffic noise

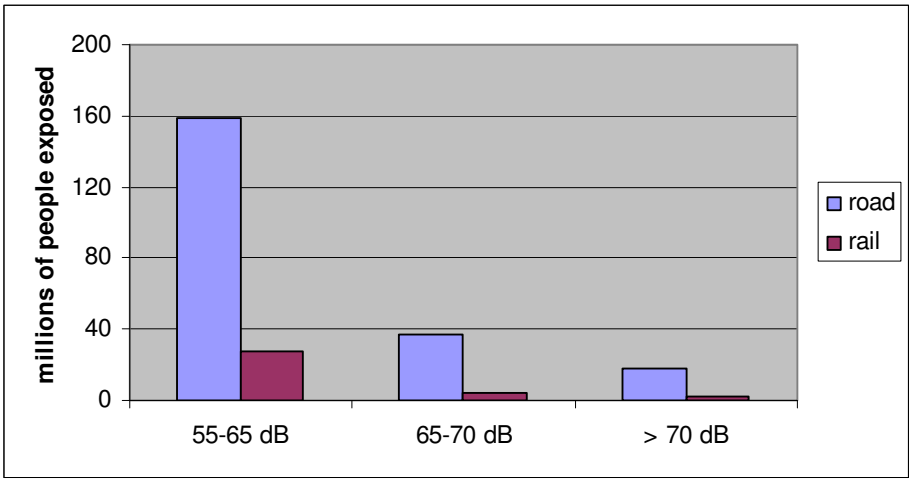
In the year 2000 about 44% of the population of the EU25[3] (over 210 million people) were exposed to road traffic noise levels above 55 dB(A). This is the WHO guideline value for outdoor noise levels and the threshold for serious annoyance . More than 54 million people were exposed to road traffic noise levels over 65 dB(A), which is ten times louder than the WHO guideline value. Rail traffic noise is a burden to fewer people. Nonetheless, 35 million people in the EU25 (about 7%) were exposed to rail traffic noise above 55 dB in 2000, with 7 million of them exposed to noise over 65 dB from this source.

[3] EU27 except Cyprus and Malta.

In most European countries the number of people exposed to noise levels below 55 dB are not reported on. As already discussed, though, noise below 55 dB may still trigger adverse effects like annoyance, sleep disturbance and reduced cognitive ability. The actual number of people exposed to levels of traffic noise that are potentially dangerous to their health will thus be higher than the figures presented in Figure 3.

The data in this figure are for the year 2000. Given traffic growth and the fact that legislation and standards have hardly changed in the meantime, these exposure figures probably underestimate the true extent of the problem.

Figure 3 Number of people exposed to road and rail traffic noise in 25 EU countries in 2000



Note: This figure covers the EU27 except Cyprus and Malta.
Source: INFRAS/IWW (2004), OECD/INFRAS/Herry (2002), calculations by CE Delft (for Estionia, Latvia, Lithuania).

These figures for the number of people exposed to traffic noise are based mainly on data from INFRAS/IWW (2004) (West European countries) and OECD/INFRAS/Herry (2002) (East European countries). Link (2000) also presents estimates for the number of people exposed to traffic noise in certain West European countries. Although in some cases the results for individual countries (including the Netherlands) differ considerably between the first and last of these studies, the aggregate numbers are comparable, with a difference of only about 3% between the two. Since INFRAS/IWW (2004) covers more countries and uses more up-to-date data, we chose to present these figures here.
The reliability of these data sets is discussed in appendix A.

2.6 Health of millions of Europeans affected by traffic noise

Although not all people exposed to road or rail noise will experience health effects (see also appendix A), a significant fraction will. Beyond investigations of the absolute number of people suffering from various health effects due to traffic noise, however, not much research has been undertaken in this area. In this sec-

tion, therefore, we cannot do much more than provide an estimate of the number of people affected by cardiovascular disease. In addition, figures on the number of people experiencing annoyance at traffic noise in Europe are presented. Finally, the health impact of traffic noise is compared to the health impact of two other social problems: air pollution and traffic accidents.

Fatal heart attack and ischemic heart diseases

The annual count of people suffering a (fatal) heart attack due to traffic noise is known for three countries only (see Table 2). For two of these, Denmark and Germany, the annual count for ischemic heart diseases (IHD) is also known.

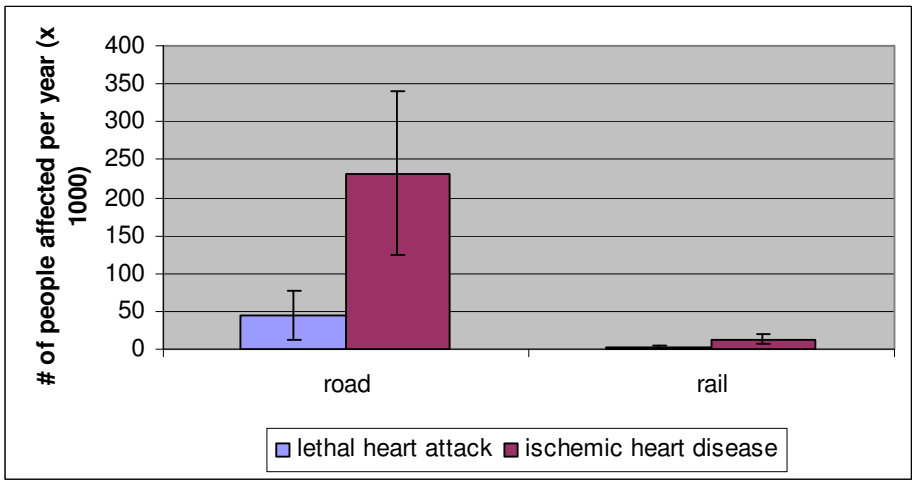
Table 2 Number of people affected by heart diseases and the probability of heart diseases due to traffic noise in three European countries

Country	Annual count of people suffering a lethal heart attack	Annual count of people affected by IHD	Probability of a lethal heart attack for people exposed to > 60 dB	Probability of IHD for people exposed to > 60 dB
Denmark	200 - 500	800 - 2200	0.00026 - 0.00065	0.001 - 0.003
Germany	4,289	27,366	0.00017	0.001
Netherlands	300 - 1000	-	0.00016 - 0.00053	-

Sources: Babish, 2006; Danish, 2003; RIVM, 2005; probabilities calculated by CE Delft.

Based on these figures and the number of people exposed to noise levels above 60 dB(A) in the relevant countries, we estimated the probability of a fatal heart attack or ischemic heart disease and used these probabilities to estimate the number of people likely to be affected by these diseases in the EU25 annually. To this end, for each country we multiplied the number of people exposed to noise levels over 60 dB(A) by the respective probabilities of the heart diseases. The aggregate results of this estimation procedure are shown in Figure 4.

Figure 4 Indication of number of people affected by an ischemic heart disease or suffering a lethal heart attack due to traffic noise in the EU25 (2000)



Note: This figure covers the EU27 except Cyprus and Malta.

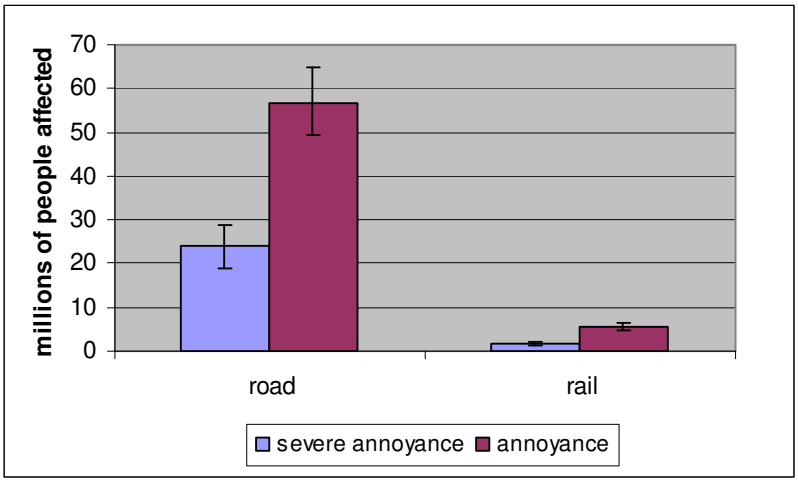
To estimate the number of people affected by heart diseases the average of the probabilities from Table 2 were used, with the upper and lower bounds of the band width estimated using the highest and lowest probability, respectively.

We can conclude that over 245,000 people in the EU25 are affected by an ischemic heart disease due to traffic noise annually, of whom 94% (approx. 231,000) due to road traffic noise. About 20% (almost 50,000) of these people suffer fatal heart attacks. Road and rail traffic noise are thus responsible for around 50,000 premature deaths per year in Europe.

Annoyance

To estimate the number of people experiencing annoyance at traffic noise, we used exposure-response relationships. Miedema & Oudshoorn (2001) have estimated the percentage of people annoyed as a function of both road and rail traffic. Their exposure-response functions have already been presented in paragraph 2.3.1. These researchers derived exposure-response functions for both severe annoyance and annoyance and these curves have been recommended for use in EU legislation on noise (EC, 2001). Figure 5 shows the number of people experiencing (severe) annoyance at road and rail traffic noise in the EU25.

Figure 5 Number of people affected by (severe) annoyance due to road and rail traffic noise in the EU25 in 2000



Note: This figure covers the EU27 except Cyprus and Malta.

To estimate the number of people affected by (severe) annoyance, the exposure data from paragraph 2.5 were used. These exposure data are related to L_{Aeq} noise levels, while the exposure-response functions of Miedema & Oudshoorn are defined for L_{den} noise levels. For this reason the exposure data were translated using a rule of thumb: noise levels expressed in L_{den} are approximately 2 dB(A) lower than those expressed in L_{Aeq}. To express the uncertainty in the estimates a band width for the results is shown. The upper and lower bound of this band width were estimated by varying the exposure figures by 2 dB(A).

Around 57 million people in the EU25 are annoyed by road traffic noise, 42% of whom (approximately 24 million) are severely annoyed. This means that about 12% of the European population suffers annoyance due to road traffic noise. Rail traffic noise causes annoyance to about 5.5 million Europeans (about 1% of the total European population), of whom about 2 million are severely annoyed.

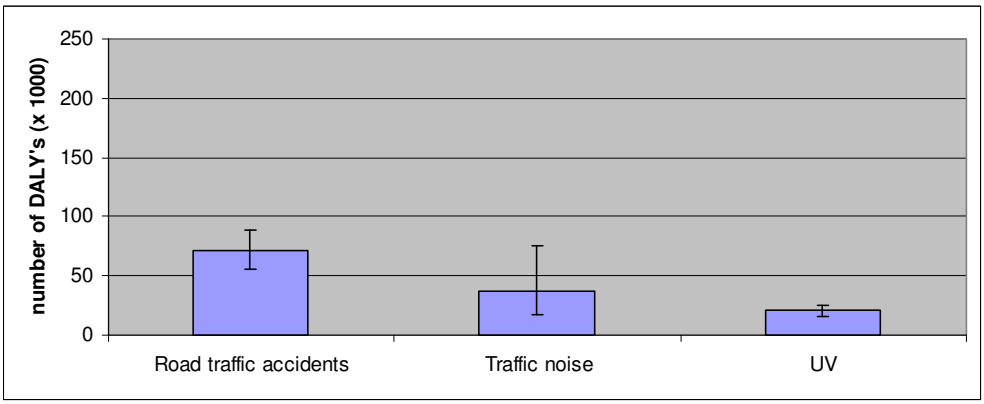
Comparison with health impact of other environmental problems

Disability-adjusted life years (DALY) is a measure used to quantify the overall burden of disease on a population. It does so by combining the impact of premature death (mortality; life years lost) and disability (morbidity; life years lived with disability or disease) into a single, comparable measure. DALYs represent the total number of years of life lost due to premature death and of years lived with a reduced level of health, weighted by the seriousness of the health impairment suffered (SAEFL, 2003). Below, we use DALYs to summarise the health impact of an external environmental influence, traffic noise. By using this concept it is possible to compare the total impact of several health effects of traffic noise and, moreover, to compare the magnitude of these effects with that of other problems affecting society, such as air pollution and traffic accidents.

The WHO is currently working on an estimate of DALYs for traffic noise for Europe. To date, however, there is only country for which such an estimate is publicly available: the Netherlands. For this country, RIVM (2005) present DALYs for several environmental vectors of disease: see Figure 6. The DALYs for traffic

noise take the following health effects into account: mortality (through stress, hypertension and cardiovascular diseases), severe annoyance and severe sleep disturbance. These health effects are the major determinants of DALYs caused by traffic noise. Including other health effects, such as the adverse impact on cognitive functioning and hearing impairment, will not significantly change the order of magnitude of DALYs related to traffic noise.

Figure 6 Burden of disease due to several problems in the Netherlands in 2000, in DALYs



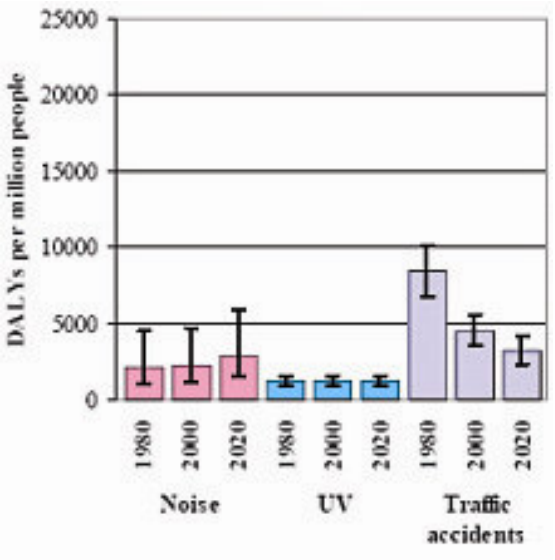
Note: The 90% prediction intervals around the respective DALY values are indicated by a band width. The figures for traffic noise include road, rail and air traffic noise.
Source: RIVM, 2005.

The annual health loss associated with traffic noise is approximately half the health loss due to traffic accidents.

The number of DALYs related to traffic noise presented in Figure 6 also includes the noise of air traffic. The latter is only a very minor source of health loss (see Figure 8), as airport noise affects only relatively few people. However, the exposure of these people is likely to be severe, and so will their health loss.

RIVM (2005) also present trends in the environmental burden of disease in the Netherlands for the period 1980-2020. Figure 7 presents trends in DALYs due to three environmental problems.

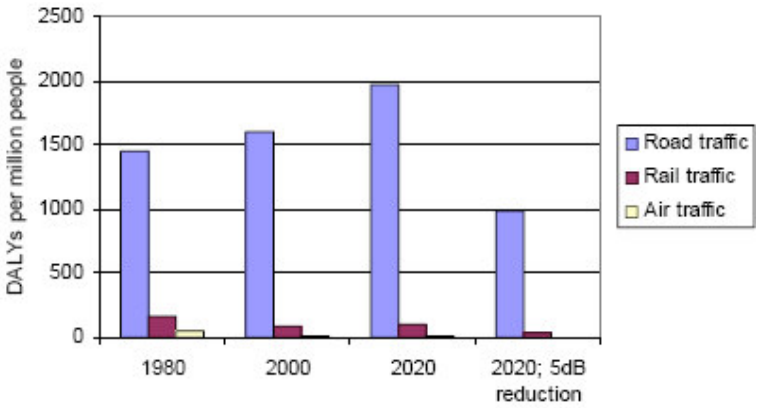
Figure 7 Trends in DALYs per million people in the Netherlands for the period 1980-2020



Source: RIVM, 2005.

In contrast to problems like traffic accidents, the number of DALYs due to traffic noise rose between 1980 and 2000. With policy as it stands today, this disease burden will continue to grow in the coming years, while that of traffic accidents will continue to fall. RIVM (2005) also report on the potential decrease in disease burden if noise levels are reduced by around 5 dB(A) for every source by 2020. Such a reduction could almost halve the number of annoyance and sleep disturbance-related DALYs (see Figure 8).

Figure 8 DALYs per million caused by severe annoyance and severe sleep disturbance due to raod, train and air traffic noise, for 1980, 2000 and 2020, including an alternative scenario for 2020 (with 5 dB(A) noise exposure reduction for road and rail traffic)



Source: RIVM (2005).

In Chapter 4 we demonstrate that a 3-4 dB(A) reduction of road and railway noise is easily feasible in the short term using currently available technologies.

2.7 Effects on animals and ecosystems

It is not only humans but also animals that are affected by traffic noise. When exposed to man-made noise they may suffer both physiological and behavioural effects (Kaseloo and Tyson, 2004). With regard to the former, an animal s response may range from mild annoyance to panic and escape behaviour. These responses are manifestations of stress, which may harm an animal s health, growth and reproductive fitness. For example, energy losses due to escape and panic responses could result in impaired growth and health. For some animals, traffic noise also interferes with communication (Kaseloo, 2005). Bats, for example, a species group totally reliant on echo location, are unable to find food if noise levels are too high.

In terms of behaviour, animals may avoid places with high levels of traffic noise. In the case of birds it has been found that sound levels above 40 - 45 dB(A) influence species distribution; as the noise level at a given spot increases, fewer birds will visit the spot (Kaseloo, 2005; RIVM, 2002). For animals like the mountain goat and white-tailed deer, too, evidence has been found for the avoidance of noisy areas around busy roads (Kaseloo & Tyson, 2004).

The effects of traffic noise on animals vary markedly among as well as within species, owing to a variety of factors (such as age, sex, prior exposure, etc.). It is therefore hard to draw any general conclusions about the effects of traffic noise on animals. Further research on this topic is certainly needed. Nevertheless, from the evidence presented here it is reasonable to say that traffic noise interferes with animals feeding, hunting and breeding behaviour and performance.

3 The social costs of traffic noise

3.1 Valuing the health effects of traffic noise

The loss of well-being due to exposure to traffic noise can be expressed in monetary terms. The amount of money people are willing to pay to avoid traffic noise provides a good estimate of the loss of well-being people experience. In some instances the market will provide reliable estimates of people s willingness to pay (WTP). For example, the price of sleeping pills provides an estimate of the WTP to fall asleep and avoid night-time awakenings.

For many of the health effects of noise, however, there are no such market prices. To estimate the WTP to avoid these effects various methods are available. Generally speaking, there are two relevant valuation methods: hedonic pricing and contingent valuation. The hedonic pricing method examines variations in housing prices due to traffic noise. These differences can be seen as the WTP to avoid the adverse effects (especially annoyance) of noise. The contingent valuation method, on the other hand, involves asking people directly in a survey how much they would be willing to pay to avoid certain health effects associated with noise. Both methods are used for placing a value on the effects of traffic noise.

To value mortality due to traffic noise means assigning a monetary value to a human life. In the field of environmental valuation this has always been a controversial topic, for the WTP to avoid the loss of one s life is infinite, is it not? Nonetheless, in their everyday lives people make plenty of choices that influence their risk of mortality. For example, we may choose to drive a motorcycle despite being aware that this involves a greater risk of lethal accident than driving a car. With the aid of this kind of information on risk behaviour a value can be determined for a *statistical* human life.

Additional information on attributing a monetary value to traffic noise is provided in appendix B.

3.2 Social cost of traffic noise in EU22 over € 40 billion a year

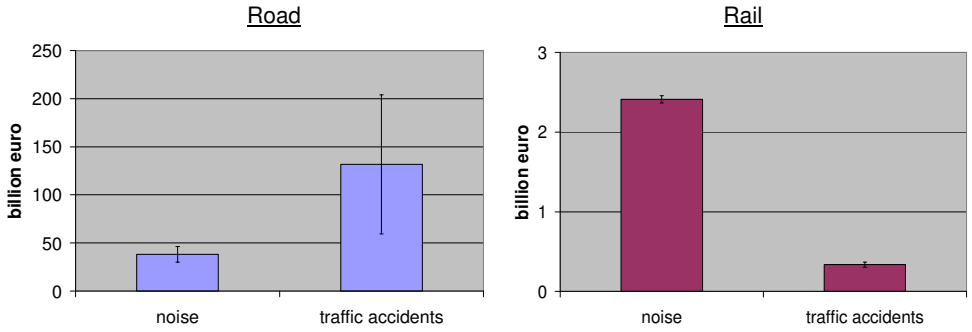
The social cost of road traffic noise in the EU22[4] is estimated to be at least €38 (30 - 46) billion per year, which is approximately 0.4% of total GDP in the EU22. For rail, estimates of social costs due to noise are about € 2.4 (2.3 - 2.5) billion per year (about 0.02% of total EU22 GDP). It should be noted that this takes into account only effects related to noise levels above 55 dB(A), while people may also be adversely affected by noise below this level. Hence, the social cost estimates presented here probably underestimate the actual costs.

The social costs of road traffic noise in the EU22 are almost one-third of those associated with road traffic accidents; see Figure 9. In the case of rail traffic,

[4] EU27 except Cyprus, Estonia, Latvia, Lithuania and Malta.

though, the social costs of noise are approximately seven times those of accidents.

Figure 9 Social costs of traffic noise in the EU22 compared to those of traffic accidents (2006 price level)



Note : This figure covers the EU27 except Cyprus, Estonia, Latvia, Lithuania and Malta and hence covers 98.4% of the EU27 s population.

Sources: INFRAS/IWW (2004), OECD/INFRAS/Herry (2002), Link (2000).

These social cost estimates are based on valuation studies by INFRAS/IWW (2004), OECD/INFRAS/Herry (2002) and Link (2000). INFRAS/IWW and Link provide cost estimates for West European countries, while cost estimates for East European countries are provided by OECD/INFRAS/Herry. INFRAS/IWW and Link cover partly the same countries, with the two studies presenting somewhat different estimates for some of them. A brief explanation for these differences is given in appendix B. As it is not clear which of the studies presents the most reliable estimates, in calculating total social noise costs in the EU22 the average of the two has been used for the relevant countries. For these countries minimum and maximum estimates were also determined, which were used to estimate band width. Note that the band width for the estimated social costs of traffic noise in the EU22 is based on minimum and maximum estimates for just 9 countries. For the other 13 countries, only a single estimate was available.

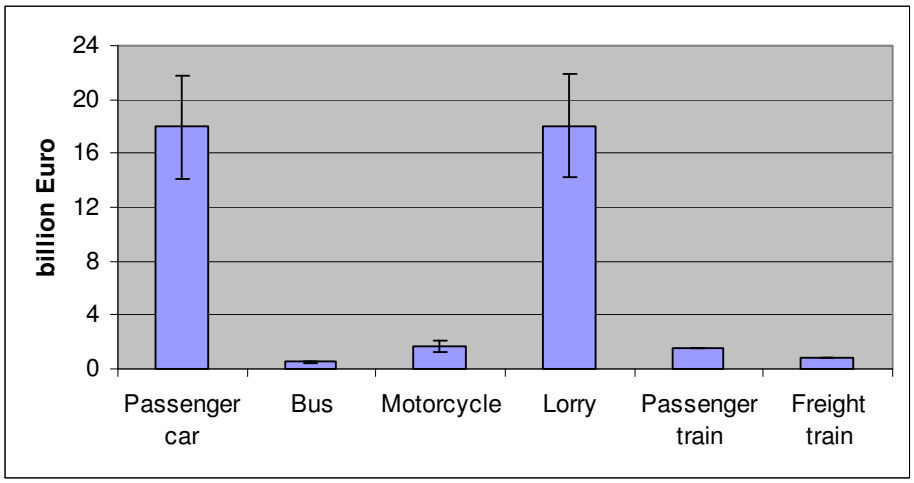
Another way to estimate the social costs of traffic noise is by valuating the associated DALYs (see previous chapter). As mentioned, the WHO is currently working on an estimate of DALYs due to traffic noise in Europe and certain preliminary results of this study have already been presented in the EU s Noise Steering Group[5]. These tentative results show that the total number of DALYs depends heavily on how the DALYs due to annoyance are calculated. Differences in measuring method yield estimates differing by a factor 2. If we value the WHO s conservative estimate of DALYs (assumption: 1 DALY equals € 78,500 (VITO, 2003)), the social costs of traffic noise are found to be comparable to the figure obtained by using the results of INFRAS/IWW, OECD/INFRAS/Herry and Link. The social cost estimates presented above would therefore appear to be robust, but conservative.

[5] See: http://circa.europa.eu/Public/irc/env/noisedir/library?l=/health_effects_noise/who&vm=detailed&sb=Title

3.3 Passenger cars and lorries responsible for bulk of costs

Passenger cars and lorries are responsible for 90% of the total social costs of road and rail traffic noise in Europe; see Figure 10. This is due above all to the large number of vehicles and kilometres driven on European roads.

Figure 10 Distribution of social costs due to traffic noise in the EU22 over transport modes (2006 price level)



Note : This figure covers the EU27 except Cyprus, Estonia, Latvia, Lithuania and Malta.
Sources: INFRAS/IWW (2004), OECD/INFRAS/Herry (2002), Link (2000).

This distribution of social costs over transport modes is again based on the valuation studies by INFRAS/IWW (2004), OECD/INFRAS/Herry (2002) and Link (2000). To derive average figures for the EU22 the same methodology was used as in section 3.2.

3.4 Benefits of noise reduction

Noise abatement policies will have major economic benefits. Less people will be annoyed by traffic noise and the incidence of health problems will decline. With their sleep less disturbed, people may also be more productive at work. The latter effect may be reinforced by improved cognitive performance, moreover. According to Navrud (2002) the perceived benefit of noise reduction is € 25 per household per decibel per year. This estimate is based on a thorough review of the literature on this topic. The EU working group Health and Socio-Economic Aspects (2003) also recommends using this figure to value noise reduction.

Noise abatement policies will generate cost savings for government, too. Expenditures on the health system will be lower due to a decline in noise-related health problems. In addition, if noise is reduced at its source (i.e. on vehicles, road surfaces and rail tracks), then local and national authorities can reduce the funds currently spent on building and maintaining noise barriers and insulation. The Dutch government s Noise Innovation Programme (IPG) has calculated that for every decibel of noise reduction at-source €100 million in expenditures on end-of-

pipe measures such as noise barriers and insulation will be saved (IPG, 2007). This calculation only takes major interurban roads and railways into account. Actual savings will probably be even greater, because other regions and urban areas will also benefit from such noise reduction via at-source measures. From a social perspective there is also a preference for at-source over end-of-pipe measures, the latter being considerably less cost-effective (see Chapter 4).

EXHIBIT P

Chapter 7: Noise Element

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Chapter 7: Noise Element

Definitions

Following is a list of commonly used terms and abbreviations that may be found within this element or when discussing the topic of noise. This is an abbreviated glossary to be reviewed prior to reading the element. It is important to become familiar with the definitions listed in order to better understand the importance of the Noise Element within the County of Riverside General Plan. Since the disbanding of the State Office of Noise Control in the mid-1990, the State of California Office of Planning and Research General Plan Guidelines can offer further information on other noise-related resources.

Ambient Noise: The composite of noise from all sources near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

CNEL (Community Noise Equivalent Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m.

dB (Decibel): The unit of measure that denotes the ratio between two quantities that are proportional to power; the number of decibels corresponding to the ratio of the two amounts of power is based on a logarithmic scale.

dBA (A-weighted decibel): The A-weighted decibel scale discriminates upper and lower frequencies in a manner approximating the sensitivity of the human ear. The scale is based on a reference pressure level of 20 micropascals.

Intrusive Noise: That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency and time of occurrence, and tonal or informational content as well as the prevailing noise level.

** The level of sound that impacts a property varies greatly during the day. As an example, the sound near an airport may be relatively quiet when no airplane is taking off or landing, but will be extremely loud as a plane*

takes off. In order to deal with these variations, several noise indices have been developed, which measure how loud each sound is, how long it lasts, and how often the sound occurs. The indices express all the sound occurring during the day as a single average level, which if it occurred all day would convey the same sound energy to the site.

L_{10}: The A-weighted sound level exceeded ten percent of the sample time. Similarly, L_{50}, L_{90}, etc.

L_{eq} (Equivalent energy level): The average acoustic energy content of noise during the time it lasts. The L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure, no matter what time of day they occur. The County of Riverside uses a 10-minute L_{eq} measurement.

L_{dn} (Day-Night Average Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of 10 decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m. Note: CNEL and Ldn represent daily levels of noise exposure averaged on an annual or daily basis, while Leq represents the equivalent energy noise exposure for a shorter time period, typically one hour.

Micropascal: The international unit for pressure, similar to pounds per square inch. 20 micropascals is the human hearing threshold. The scale ranges from zero for the average least perceptible sound to about 130 for the average pain level

Noise Contours: Lines drawn around a noise source indicating equal levels of noise exposure. CNEL and Ldn are the metrics used in this document to describe annoyance due to noise and to establish land use planning criteria for noise.

Introduction

"It is the policy of the United States to promote an environment for all Americans free from noise that jeopardizes their health or welfare."

-Noise Control Act of 1972

Before the alarm clock sounds, the lawn mower next door begins to roar. Then, while listening to the morning news on the radio, an airplane flies overhead and deadens all sound in the neighborhood. Once outside, the neighbor's stereo can be heard a block away. And during the morning commute, car horns, rumbling mufflers, and whirring motorcycles serenade motorists on the highway. Even in the most rural areas of Riverside County, the eternal battle between the efficiency of technology, and the noise it can create cannot be avoided.

***Sound** refers to anything that is or may be perceived by the ear.*

***Noise** is defined as 'unwanted sound' because of its potential to disrupt sleep, rest, work, communication, and recreation, to interfere with speech communication, to produce physiological or psychological damage, and to damage hearing.*

***Tinnitus:** The perception of ringing, hissing, or other sound in the ears or head when no external sound is present. For*

As modern transportation systems continue to develop and human dependence upon machines continues to increase, the general level of noise in our day to day living environment rises. In Riverside County, residential areas near airports, freeways, and railroads are being adversely affected by annoying or hazardous noise levels. Other activities such as construction, operation of household power tools and appliances, and industry, also contribute to increasing background noise.

Addressing Noise Issues

The Noise Element is a mandatory component of the General Plan pursuant to the California Planning and Zoning Law, Section 65302(f). The element must recognize the guidelines adopted by the Office of Planning and Research pursuant to Section 46050.1 of the Health and Safety Code. It also can be utilized as a tool for compliance with the state's noise insulation standards.

The General Plan Noise Element provides a systematic approach to identifying and appraising noise problems in the community; quantifying existing and

some people, tinnitus is just a nuisance. For others, it is a life-altering condition. In the United States, an estimated 12 million people have tinnitus to a distressing degree.

projected noise levels; addressing excessive noise exposure; and community planning for the regulation of noise. This element includes policies, standards, criteria, programs, diagrams, a reference to action items, and maps related to protecting public health and welfare from noise.

Setting

Riverside County is a continuously evolving group of communities that relies heavily upon the modern technological conveniences of American society to thrive and succeed as a pleasant and desirable place to live and work. Without such necessities as air-conditioning, heating, generators, and cars, living in an urban, suburban, rural, desert, or mountainous environment becomes difficult, if not impossible. Fortunately, these amenities are available to the residents of Riverside County and are used everyday, often all day long. Unfortunately, these technological advances can come at a high price to residents' and visitors' ears.

The philosophical view commonly held by Riverside County staff and residents is that noise, which may be perceived by some to be annoying, may not be noticed at all by others. It is also important to note that people who move into an area where a noise source already exists (such as near an existing highway) are often more tolerant of that noise source than when a new noise generator locates itself in an established area that may be noise-sensitive (such as a stadium that is constructed near an established community).

Noise within Riverside County is generated by numerous sources found near places where people live and work. These sources are of particular concern when the noise they generate reaches levels above the prevailing background noise. There are many different types of noise, including mobile, stationary, and construction-related, that affect noise-sensitive receptors such as residences, schools, and hospitals. Figure 1, Common Noise Sources and Noise Levels, illustrates some noise producers that can be found within Riverside County, as well as their corresponding noise measurement. The following sections contain policies that address the issues of noise producers and their effects on noise-sensitive land uses.

Figure N-1: Common Noise Sources and Noise Levels



Noise Sensitive Land Uses

A series of land uses have been deemed sensitive by the State of California. These land uses require a serene environment as part of the overall facility or residential experience. Many of these facilities depend on low levels of sound to promote the well being of the occupants. These uses include, but are not necessarily limited to; schools, hospitals, rest homes, long term care facilities, mental care facilities, residential uses, places of worship, libraries, and passive recreation areas. Activities conducted in proximity to these facilities must consider the noise output, and ensure that they don't create unacceptable noise levels that may unduly affect the noise-sensitive uses. The following policies

address issues related to noise-sensitive land uses.

Noise Compatibility

The Noise Element of the General Plan is closely related to the Land Use Element because of the effects that noise has on sensitive land uses. Noise-producing land uses must be compatible with adjacent land uses in order for the Land Use Plan to be successful. Land uses that emit noise are measured in A-weighted decibels (dBA) or Community Noise Equivalent Level (CNEL). If existing land uses emit noise above a certain level, they are not compatible with one another, and therefore noise attenuation devices must be used to mitigate the noise to acceptable levels indoors and outdoors. In cases of new development, the placement of noise-sensitive land uses is integral to a successful community. Table 1, Land Use Compatibility for Community Noise Exposure, reveals the noise acceptability levels for different land uses. Areas around airports may have different or more restrictive noise standards than those cited in Table 1 (See Policy N 1.3 below).The following policies protect noise-sensitive land uses from noise emitted by outside sources, and prevent new projects from generating adverse noise levels on adjacent properties.

Policies:

N 1.1 Protect noise-sensitive land uses from high levels of noise by restricting noise-producing land uses from these areas. If the noise-producing land use cannot be relocated, then noise buffers such as setbacks, landscaping, or blockwalls shall be used. (AI 107)

N 1.2 Guide noise-tolerant land uses into areas irrevocably committed to land uses that are noise-producing, such as transportation corridors or within the projected noise contours of any adjacent airports. (AI 107)

N 1.3 Consider the following uses noise-sensitive and discourage these uses in areas in excess of 65 CNEL:

- Schools;
- Hospitals;
- Rest Homes;
- Long Term Care Facilities;
- Mental Care Facilities;
- Residential Uses;
- Libraries;
- Passive Recreation Uses; and
- Places of worship

The General Plan policy and implementation item reference system:

Identifies which element contains the Policy, in this case the Land Use Element, and the sequential number.

LU 1.3

Neighborhood

commercial uses should be located near residential uses.

(AI 1 and AI 4)

Reference to the relevant Action Items contained in the Implementation Program.



Unregulated noise sources such as household power tools often emit more noise than regulated noise producers.

Please contact the Office of Industrial Hygiene for more information on acoustical specialists.

According to the State of California Office of Planning and Research General Plan Guidelines, an acoustical study may be required in cases where these noise-sensitive land uses are located in an area of 60 CNEL or greater. Any land use that is exposed to levels higher than 65 CNEL will require noise attenuation measures.

Areas around airports may have different noise standards than those cited above. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix L and summarized in the Policy Area section of the affected Area Plan. (AI 105)

N 1.4 Determine if existing land uses will present noise compatibility issues with proposed projects by undertaking site surveys. (AI 106, 109)

N 1.5 Prevent and mitigate the adverse impacts of excessive noise exposure on the residents, employees, visitors, and noise-sensitive uses of Riverside County. (AI 105, 106, 108)

N 1.6 Minimize noise spillover or encroachment from commercial and industrial land uses into adjoining residential neighborhoods or noise-sensitive uses. (AI 107)

N 1.7 Require proposed land uses, affected by unacceptably high noise levels, to have an acoustical specialist prepare a study of the noise problems and recommend structural and site design features that will adequately mitigate the noise problem. (AI 106, 107)

N 1.8 Limit the maximum permitted noise levels that cross property lines and impact adjacent land uses, except when dealing with noise emissions from wind turbines. Please see the Wind Energy Conversion Systems section for more information. (AI 108)

Table N-1
Land Use Compatibility for Community Noise Exposure



Noise Mitigation Strategies

Many land uses emit noise above state-mandated acceptable levels. The noise emitted from a land use must be mitigated to acceptable levels indoors and outdoors in order for other, more noise-sensitive land uses to locate in proximity to these noise producers. There are a number of ways to mitigate noise and the following policies suggest some possible solutions to noise problems.

Policies:

N 2.1 Create a County Noise Inventory to identify major noise generators and

noise-sensitive land uses, and to establish appropriate noise mitigation strategies. (AI 105)

N 2.2 Require a qualified acoustical specialist to prepare acoustical studies for proposed noise-sensitive projects within noise impacted areas to mitigate existing noise. (AI 105, 107)

N 2.3 Mitigate exterior and interior noises to the levels listed in the table below to the extent feasible, for stationary sources: (AI 105)

Table N-2
Stationary Source Land Use Noise Standards [1]

Land Use	Interior Standards	Exterior Standards
Residential		
10:00 p.m. to 7:00 a.m.	40 L_{eq} (10 minute)	45 L_{eq} (10 minute)
7:00 a.m. to 10:00 p.m.	55 L_{eq} (10 minute)	65 L_{eq} (10 minute)

[1]These are only preferred standards; final decision will be made by the Riverside County Planning Department and Office of Public Health.

Noise Producers

Location of Noise Producers

"Good neighbors keep their noise to themselves."

The communities of Riverside County need a variety of land uses in order to thrive and succeed. These land uses may provide jobs, clean water, ensure safety, ship goods, and ease transportation woes. But they may also emit high levels of noise throughout the day. These noise-producing land uses can complement a community when the noise they emit is properly mitigated. The following policies suggest a series of surveys and analyses to correctly identify the proper noise mitigating procedures in order to promote the continued success of the communities of Riverside County.

Agriculture

One of the major economic thrusts of Riverside County is the agricultural industry. The Riverside County Right-to-Farm Ordinance conserves, protects, and encourages the development, improvement, and continued viability of agricultural land and industries for the long-term production of food and other agricultural products, and for the economic well-being of the County's residents. The Right-to-Farm Ordinance also attempts to balance the rights of farmers to produce food and other agricultural products with the rights of non-farmers who own, occupy, or use land within or adjacent to agricultural areas. The Riverside County Right-to-Farm Ordinance also works to reduce the burden of the County's agricultural resources by limiting the circumstances under which agricultural operations may be deemed a nuisance. Policies within this section address the potential noise issues that may be raised in regards to agricultural production.

Policies:

N 3.1 Protect Riverside County's agricultural resources from noise complaints

that may result from routine farming practices, through the enforcement of the Riverside County Right-to-Farm Ordinance. (AI 105, 107)

N 3.2 Require acoustical studies and subsequent approval by the Planning Department and the Office of Industrial Hygiene, to help determine effective noise mitigation strategies in noise-producing areas. (AI 105)

N 3.3 Ensure compatibility between industrial development and adjacent land uses. To achieve compatibility, industrial development projects may be required to include noise mitigation measures to avoid or minimize project impacts on adjacent uses. (AI 107)

N 3.4 Identify point-source noise producers such as manufacturing plants, truck transfer stations, and commercial development by conducting a survey of individual sites. (AI 106)

N 3.5 Require that a noise analysis be conducted by an acoustical specialist for all proposed projects that are noise producers. Include recommendations for design mitigation if the project is to be located either within proximity of a noise-sensitive land use, or land designated for noise-sensitive land uses. (AI 109)

N 3.6 Discourage projects that are incapable of successfully mitigating excessive noise. (AI 107)

N 3.7 Encourage noise-tolerant land uses such as commercial or industrial, to locate in areas already committed to land uses that are noise-producing. (AI 107)

Stationary Noise

A stationary noise producer is any entity in a fixed location that emits noise. Stationary noise producers are common in many noise-sensitive areas. Motors, appliances, air conditioners, lawn and garden equipment, power tools, and generators are often found in residential neighborhoods, as well as on or near the properties of schools, hospitals, and parks. These structures are often a permanent fixture and are required for the particular land use. Industrial and manufacturing facilities are also stationary noise producers that may affect sensitive land uses. Furthermore, while noise generated by the use of motor vehicles over public roads is preempted from local regulation, the County considers the use of these vehicles to be a stationary noise source when operated on private property such as at a truck terminal or warehousing facility. The emitted noise from the producer can be mitigated to acceptable levels either at the source or on the adjacent property through the use of proper planning, setbacks, blockwalls, acoustic-rated windows, dense landscaping, or by changing the location of the noise producer. The following policies identify mechanisms to measure and mitigate the noise emitted from stationary noise producers.

Community Noise Inventory

There are a series of noise producers within Riverside County that bear special



The cumulative noise created by truck transfer stations can reach excessive levels when noise sensitive uses are located nearby.

recognition. These uses may be important parts of the economic health of the County, but they still emit noise from time to time. Some of the special noise producers within the County include, but are not limited to the Riverside Raceway, surface mining, truck transfer stations in the Mira Loma area, manufacturing facilities, and natural gas transmission pipelines.

Three high pressure natural gas transmission pipelines are located in the community of Cabazon (within the Pass Area Plan), and a series of valve stations are placed along the pipeline throughout the community. The pipelines supply a major portion of the non-transportation energy supply for southern California. The depressurization of mainline valves at the valve stations for emergency or maintenance reasons can result in noise levels exceeding 140 dB L_{eq} at a distance of 50 feet from the source for more than an hour at a time. The pipelines are not located in heavily populated areas; however, should higher-intensity uses be approved in the area in the future, possible relocation of one or more pipelines or valves may be necessary.

Policies:

N 4.1 Prohibit facility-related noise, received by any sensitive use, from exceeding the following worst-case noise levels: (AI 105)

a. 45 dBA-10-minute L_{eq} between 10:00 p.m. and 7:00 a.m.

b. 65 dBA-10-minute L_{eq} between 7:00 a.m. and 10:00 p.m.

N 4.2 Develop measures to control non-transportation noise impacts. (AI 105)

N 4.3 Ensure any use determined to be a potential generator of significant stationary noise impacts be properly analyzed, and ensure that the recommended mitigation measures are implemented. (AI 105, 106, 109)

N 4.4 Require that detailed and independent acoustical studies be conducted for any new or renovated land uses or structures determined to be potential major stationary noise sources. (AI 105)

N 4.5 Encourage major stationary noise-generating sources throughout the County of Riverside to install additional noise buffering or reduction mechanisms within their facilities to reduce noise generation levels to the lowest extent practicable prior to the renewal of Conditional Use Permits or business licenses or prior to the approval and/or issuance of new Conditional Use Permits for said facilities. (AI 105, 107)

*A **pure tone** is a single frequency tone with no harmonic content (e.g. hum).*

N 4.6 Establish acceptable standards for residential noise sources such as, but not limited to, leaf blowers, mobile vendors, mobile stereos and stationary noise sources such as home appliances, air conditioners, and swimming pool equipment. (AI 105)

N 4.7 Evaluate noise producers for the possibility of pure-tone producing noises. Mitigate any pure tones that may be emitted from a noise source. (AI 106, 107)

N 4.8 Require that the parking structures, terminals, and loading docks of commercial or industrial land uses be designed to minimize the potential noise impacts of vehicles on the site as well as on adjacent land uses. (AI 106, 107)

Wind Energy Conversion Systems (WECS)

Wind energy is a unique resource found only in a portion of Riverside County. Wind Energy Conversion Systems (WECS) are used to harness the energy found in strong gusts of wind. In order to fully capitalize on this special commodity, a large number of wind turbines have been placed in a portion of the Coachella Valley and San Gorgonio Pass within Riverside County. There are some residential areas spread throughout the County that may also capitalize on wind-generated power. Though there is minimal residential development in the immediate areas where these windmills are located, the potential for noise and ground-borne vibration in neighboring developed areas may occur. The Wind Implementation Monitoring Program, designed and implemented by Riverside County, guides the policy direction for this area.

Policies:

N 5.1 Enforce the Wind Implementation Monitoring Program (WIMP).

N 5.2 Encourage the replacement of outdated technology with more efficient technology with less noise impacts. (AI 105)

Mobile Noise

*Please see the **Circulation Element** for further policies regarding transportation and noise related issues.*

Mobile noise sources may be one of the most annoying noise producers in a community because they are louder than background noises and more intense than many acceptable stationary noise sources. Though the noise emitted from mobile sources is temporary, it is often more disturbing because of its abruptness, especially single noise-producing events such as vehicle backfires. Common mobile noise sources include on-road vehicles, aircraft, and trains. The policies in this section identify common mobile noise sources, and suggest mitigation techniques to reduce the annoyance and burden of mobile noise sources on noise-sensitive receptors.

Policies:

N 6.1 Consider noise reduction as a factor in the purchase of County maintenance equipment and their use by County contractors and permittees. (AI 108)

N 6.2 Investigate the feasibility of retrofitting current County-owned vehicles and mechanical equipment to comply with noise performance standards consistent with the best available noise reduction technology. (AI 108)



Commercial Airliners are mobile noise sources that contribute to noise pollution.

N 6.3 Require commercial or industrial truck delivery hours be limited when adjacent to noise-sensitive land uses unless there is no feasible alternative or there are overriding transportation benefits. (AI 105, 107)

N 6.4 Restrict the use of motorized trail bikes, mini-bikes, and other off-road vehicles in areas of the County except where designated for that purpose. Enforce strict operating hours for these vehicles in order to minimize noise impacts on sensitive land uses adjacent to public trails and parks. (AI 105, 108)

Transportation

The most common mobile noise sources in the County are transportation-related. Motor vehicle noise is of concern because it is characterized by a high

number of individual events, which often create a higher sustained noise level in proximity to areas sensitive to noise exposure. Rail and aircraft operations, though less frequent, may generate extremely high noise levels that can be disruptive to daily activities. Though mass transit has not yet been developed within Riverside County, it is important to consider the noise that may be generated from transit service.

Airports

The following airports are located within or have a direct effect on Riverside County. Please see Appendix I for a map with each airport's noise contours. Also see the area plans and airport land use plans for more specific airport-related policies:

- *Banning Municipal Airport*
- *Bermuda Dunes Airport*
- *Blythe Airport*
- *Chino Airport*
- *Corona Municipal Airport*
- *Chiriaco Summit Airport*
- *Desert Center Airport*
- *Desert Resorts Regional Airport*
- *Flabob Airport*
- *French Valley Airport*
- *Hemet-Ryan Airport*
- *March Inland Port*
- *Palm Springs Regional Airport*
- *Perris Valley Airport*
- *Riverside Municipal Airport*
- *Skylark Airport*

With the dynamic growth in aviation, aircraft noise will remain a challenging environmental problem and one that will affect an increasing number people as air traffic routes and procedures change in the future. Aircraft noise appears to produce the greatest community anti-noise response, although the duration of the noise from a single airplane is much less, for example, than that from a freight train. There is great economic benefit to gain from airports of any size, although living in proximity to an airport may bring about expected aircraft noise.

There are 15 (fifteen) airports that are located within or have a direct effect on Riverside County. The land under the flight paths of each airport was monitored to determine the amount of noise emitted by common aircraft taking-off and landing at any given airport. Noise contours were created based on the measurements from the monitoring program. The CNEL noise contour(s) for the following airports have been depicted in the applicable Area Plan's Airport Influence Area section:

- Banning Municipal Airport
- Bermuda Dunes Airport
- Blythe Airport
- Chino Airport
- Chiriaco Summit Airport
- Corona Municipal Airport
- Desert Center Airport
- Desert Resorts Regional Airport
- Flabob Airport
- French Valley Airport
- Hemet Ryan Airport
- Riverside Municipal Airport

An Airport Land Use Plan has been created for each airport within Riverside County, and it should be referenced for further information regarding airports. Helicopters and heliports are also potential sources of noise, but due to the relatively low frequency and short duration of their operation in most

circumstances, these operations do not significantly affect average noise levels within the County. The following general policies address the noise that comes from airports and the aircraft they service.

Policies:

N 7.1

New land use development within Airport Influence Areas shall comply with airport land use noise compatibility criteria contained in the corresponding airport land use compatibility plan for the area. Each Area Plan affected by a public-use airport includes one or more Airport Influence Areas, one for each airport. The applicable noise compatibility criteria are fully set forth in Appendix L and summarized in the Policy Area section of the affected Area Plan.

N 7.2 Adhere to applicable noise compatibility criteria when making decisions regarding land uses adjacent to airports. Refer to the Airports section of the Land Use Element (Page LU-32) and the Airport Influence Area sections of the corresponding Area Plans.

N 7.3 Prohibit new residential land uses, except construction of a single-family dwelling on a legal residential lot of record, within the current 60 dB CNEL contours of any currently operating public-use, or military airports. The applicable noise contours are as defined by the Riverside County Airport Land Use Commission and depicted in Appendix L, as well as in the applicable Area Plan's Airport Influence Area section.

N 7.4 Check each development proposal to determine if it is located within an airport noise impact area as depicted in the applicable Area Plan's Policy Area section regarding Airport Influence Areas. Development proposals within a noise impact area shall comply with applicable airport land use noise compatibility criteria.

N 7.5 Revise the Riverside County Zoning Code to reflect aircraft noise-impacted areas around the County's major airports. (AI 109)

Vehicular

*Please see the **Circulation Element** for more in-depth information regarding Level of Service Standards, Average Daily Trips, and other information related to vehicular circulation.*

Roadway traffic is one of the most pervasive sources of noise within Riverside County. Traffic noise varies in how it affects land uses depending upon the type of roadway, and the distance of the land use from that roadway. Some variables that affect the amount of noise emitted from a road are speed of traffic, flow of traffic, and type of traffic (e.g. tractor trailers versus cars). Another variable affecting the overall measure of noise is a perceived increase in sensitivity to vehicular noise at night. Appendix I contains tables and figures that illustrate existing and forecasted noise from roadways throughout the County. The existing noise measurements were obtained by measuring noise at different points adjacent to the roadway. The future noise contours along freeways and major highways, also located in Appendix I, were created from the results of traffic modeling to project the noise of major roadways in the future. The following policies address the issues of roadway traffic noise, and suggest methods to reduce the noise impact of roads on adjacent and nearby land uses.

Policies:

N 8.1 Enforce all noise sections of the State Motor Vehicle Code.

N 8.2 Ensure the inclusion of noise mitigation measures in the design of new roadway projects in the County. (AI 105)



Off-road and all-terrain vehicles must obey strict operating hours when noise-sensitive land uses are nearby or adjacent to trails and open space.

N 8.3 Require development that generates increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses to provide for appropriate mitigation measures. (AI 106)

N 8.4 Require that the loading and shipping facilities of commercial and industrial land uses, which abut residential parcels be located and designed to minimize the potential noise impacts upon residential parcels. (AI 105)

N 8.5 Employ noise mitigation practices when designing all future streets and highways, and when improvements occur along existing highway segments. These mitigation measures will emphasize the establishment of natural buffers or setbacks between the arterial roadways and adjoining noise-sensitive areas. (AI 105)

"Calling noise a nuisance is like calling smog an inconvenience. Noise must be considered a hazard to the health of people everywhere."

-The Surgeon General

N 8.6 Require that all future exterior noise forecasts use Level of Service C, and be based on designed road capacity or 20-year projection of development (whichever is less) for future noise forecasts. (AI 106)

N 8.7 Require that field noise monitoring be performed prior to siting to any sensitive land uses along arterial roadways. Noise level measurements should be of at least 10 minutes in duration and should include simultaneous vehicle counts so that more accurate vehicle ratios may be used in modeling ambient noise levels. (AI 106)

Mass Transit

*Please see the **Circulation Element** for additional policies related to transit development and rail systems.*

Currently, the County does not participate in or provide any rail transit services though public transportation is becoming a more desirable option for many travelers and commuters in Riverside County. Transit can be an alternative to driving a car through congested Riverside County freeways. Currently, the noise generated by public transportation within Riverside County affects only a very small percentage of the total residential population. As years pass, and the need for public transportation increases, there will be a greater number of residents affected by the noise that buses, transit oases shuttles, light rail, and trains will produce. The following policies address the issues of noise related to public transit.

Policies:

N 9.1 Encourage local and regional public transit providers to ensure that the equipment they operate and purchase is state-of-the-art and does not generate excessive noise impacts on the community. (AI 108)

N 9.2 Encourage the use of quieter electric-powered vehicles. (AI 108)

N 9.3 Encourage the development and use of alternative transportation modes including bicycle paths and pedestrian walkways to minimize vehicular noise within sensitive receptor areas.

N 9.4 Actively participate in the development of noise abatement plans for freeways and rapid transit. (AI 108)

Rail

The rail system within Riverside County criss-crosses its way through communities, industrial areas, rural areas, and urban centers. Trains carry passengers, freight, and cargo to local and regional destinations day and night.

*An **at-grade railroad crossing** is one where the street and the rail line form an intersection, and physically cross one-another.*

Rail transportation may become more popular in the future if a mass public transportation system is implemented within Riverside County. Currently, daily train traffic produces noise that may disrupt activities in proximity to railroad tracks. For instance, trains are required to sound their horns at all at-grade crossings, and they may also be required to slow their speed through residential areas. These types of noise disturbances can interfere with activities conducted on noise-sensitive land uses. Exhibits showing existing railroad noise contours can be found in Appendix I. These exhibits provide purely illustrative contours along rail lines throughout the County. The following policies suggest actions that could minimize the impacts of train noise on noise-sensitive land uses.

Policies:

N 10.1 Check all proposed projects for possible location within railroad noise contours using typical noise contour diagrams. (AI 106, 109)

N 10.2 Minimize the noise effect of rail transit (freight and passenger) on residential uses and other sensitive land uses through the land use planning process. (AI 106, 109)

N 10.3 Locate light rail and fixed rail routes and design rail stations in areas that are accessible to both residential and commercial areas, but also minimize noise impacts on surrounding residential and sensitive land uses. (AI 106, 109)

N 10.4 Install noise mitigation features where rail operations impact existing adjacent residential or other noise-sensitive uses. (AI 108)

N 10.5 Restrict the development of new sensitive land uses to beyond the 65 decibel CNEL contour along railroad rights-of-way. (AI 106, 109)

Building and Design

One of the most effective means of reducing noise in a sensitive area is to construct and design buildings in such a way that the noise is deflected in such a way that it does not affect the occupants. If the building has already been constructed, then landscaping and design techniques can be used to tastefully absorb the noise emitted from mobile or stationary sources. These building and design techniques should serve two purposes; to mitigate noise to acceptable indoor and outdoor levels, and to enhance the community character rather than detract from its surroundings. The following policies have been included in the Noise Element to ensure that the character of each community within Riverside County is preserved while minimizing noise to acceptable levels.

Natural Barriers and Landscaping

Policies:

N 11.1 Utilize natural barriers such as hills, berms, boulders, and dense vegetation to assist in noise reduction. (AI 108)

N 11.2 Utilize dense landscaping to effectively reduce noise. However, when there is a long initial period where the immaturity of new landscaping makes this approach only marginally effective, utilize a large number of highly dense species planted in a fairly mature state, at close intervals, in conjunction with earthen berms, setbacks, or block walls. (AI 108)

Temporary Construction

Policies:

N 12.1 Minimize the impacts of construction noise on adjacent uses within acceptable practices. (AI 105, 108)

N 12.2 Ensure that construction activities are regulated to establish hours of operation in order to prevent and/or mitigate the generation of excessive or adverse noise impacts on surrounding areas. (AI 105, 108)

N 12.3 Condition subdivision approval adjacent to developed/occupied noise-sensitive land uses (see policy N 1.3) by requiring the developer to submit a construction-related noise mitigation plan to the County for review and approval prior to issuance of a grading permit. The plan must depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of this project, through the use of such methods as

a. Temporary noise attenuation fences;

b. Preferential location of equipment; and

c. Use of current noise suppression technology and equipment. (AI 107)

N 12.4 Require that all construction equipment utilizes noise reduction features (e.g. mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. (AI 105, 108)

Building and Design Techniques

Policies:

N 13.1 Enforce the California Building Standards that sets standards for building construction to mitigate interior noise levels to the tolerable 45 CNEL limit. These standards are utilized in conjunction with the Uniform Building Code by the County's Building Department to ensure that noise protection is provided to the public. Some design features may include extra-dense insulation, double-paned windows, and dense construction materials.

** Non-habitable areas within a home include:*

- *kitchens*
- *bathrooms*
- *hallways*
- *garages*
- *closets*

N 13.2 Continue to develop effective strategies and mitigation measures for the abatement of noise hazards reflecting effective site design approaches and state-of-the-art building technologies. (AI 108)

N 13.3 Incorporate acoustic site planning into the design of new development, particularly large scale, mixed-use, or master-planned development, through

measures which may include:

- separation of noise-sensitive buildings from noise-generating sources;
- use of natural topography and intervening structure to shield noise-sensitive land uses; and
- adequate sound proofing within the receiving structure. (AI 106)

• *utility rooms*

• *laundry rooms*

N 13.4 Consider and, when necessary to lower noise to acceptable limits, require noise barriers and landscaped berms. (AI 108)

N 13.5 Consider the issue of adjacent residential land uses when designing and configuring all new, non-residential development. Design and configure on-site ingress and egress points that divert traffic away from nearby noise-sensitive land uses to the greatest degree practicable. (AI 106, 107)

N 13.6 Prevent the transmission of excessive and unacceptable noise levels between individual tenants and businesses in commercial structures and between individual dwelling units in multi-family residential structures. (AI 105, 108)

N 13.7 Assist the efforts of local homeowners living in high noise areas to noise attenuate their homes through funding assistance and retrofitting program development, as feasible. (AI 105, 108)

N 13.8 Review all development applications for consistency with the standards and policies of the Noise Element of the General Plan.

N 13.9 Mitigate 600 square feet of exterior space to 65 dB CNEL when new development is proposed on residential parcels of 1 acre or greater.

Mixed Use

Policies:

N 14.1 Minimize the potential adverse noise impacts associated with the development of mixed-use structures where residential units are located above or adjacent to commercial uses. (AI 106, 107, 108)

N 14.2 Require that commercial and residential mixed-use structures minimize the transfer or transmission of noise and vibration from the commercial land use to the residential land use. (AI 105)

N 14.3 Minimize the generation of excessive noise level impacts from entertainment and restaurant/bar establishments into adjacent residential or noise-sensitive uses. (AI 105, 107)

Vibration

Another community annoyance related to noise is vibration. As with noise, vibration can be described by both its amplitude and frequency. Amplitude may be characterized by displacement, velocity, and/or acceleration. Typically, particle velocity (measured in inches or millimeters per second) and/or acceleration (measured in gravities) are used to describe vibration.

***Amplitude**-the distance that a vibrating particle travels from a fixed point.*

***Frequency**-the number of wave*

cycles that occur in 1 second.

***Hertz (Hz)**-the unit by which frequency is measured.*

***Displacement**-a measure of the distance that a vibrated particle travels from its original position.*

***Velocity**-the rate of speed at which particles move in inches per second or millimeters per second.*

***Acceleration-**the rate of change in velocity with respect to time.*

Vibration can be felt outdoors, but the perceived intensity of vibration impacts are much greater indoors, due to the shaking of the structure. Some of the most common sources of vibration come from trains and/or transit vehicles, construction equipment, airplanes, and large vehicles. Several land uses are especially sensitive to vibration, and therefore have a lower vibration threshold. These uses include, but are not limited to, concert halls, hospitals, libraries, vibration-sensitive research operations, residential areas, schools, and offices.

Table 3, Human Reaction to Typical Vibration Levels, presents the human reaction to various levels of peak particle velocity. Typical construction vibrations fall in the 10 to 30 Hz range and usually occur around 15 Hz. Traffic vibrations exhibit a similar range of frequencies. However, due to their suspension systems, city buses often generate frequencies around 30 Hz at high vehicle speeds. It is more uncommon, but possible, to measure traffic frequencies above 30 Hz.

Table N-3
Human Reaction to Typical Vibration Levels

Vibration Level Peak Particle Velocity (inches/second)	Human Reaction
0.0059-0.0188	Threshold of perception, possibility of intrusion
0.0787	Vibrations readily perceptible
0.0984	Continuous vibration begins to annoy people
0.1968	Vibrations annoying to people in buildings
0.3937-0.5905	Vibrations considered unpleasant when continuously subjected and unacceptable by some walking on bridges.
Source: Caltrans, 1992	

Policies:

N 15.1 Restrict the placement of sensitive land uses in proximity to vibration-producing land uses. (AI 105)

N 15.2 Consider the following land uses sensitive to vibration:

- Hospitals;
- Residential Areas;
- Concert Halls;
- Libraries;
- Sensitive Research Operations;
- Schools; and
- Offices

N 15.3 Prohibit exposure of residential dwellings to perceptible ground vibration from passing trains as perceived at the ground or second floor. Perceptible motion shall be presumed to be a motion velocity of 0.01 inches/second over a range of 1 to 100 Hz.

Noise Information Management

*Please see **Table N-1** for more information in order to determine a noise threshold necessary for creating a noise database.*

Current and projected noise data and maps for Riverside County require constant updating and review in order for the information to remain correct as well as accurate. Currently, there is no central noise information database available for the County staff or residents to reference when noise inquiries arise. This information is necessary and should be easily accessible when reviewing potential development plans, building a new home, siting an industrial area, evaluating circulation routes, or conducting other advanced planning activities. The following policies guide the County to create a database, or central location, where up-to-date information can be accessed by County Staff or residents.

Mapping

Policies:

N 16.1 Identify, quantify, and map noise producers and provide noise contour diagrams as is practical. (AI 109)

N 16.2 Identify and map noise-sensitive land uses throughout the County. (AI 109)

N 16.3 Identify and map point-source noise producers such as surface mines, wind turbines, manufacturing plants, truck transfer stations, active recreational facilities, and amphitheaters. (AI 109)

Noise Data Management

Policies:

N 17.1 Maintain baseline information, on an ongoing basis, regarding ambient and stationary noise sources. (AI 105)

N 17.2 Monitor and update available data regarding the community's existing and projected ambient stationary noise levels.

N 17.3 Assure that areas subject to noise hazards are identified, quantified, and mapped in a form that is available to decisionmakers. (AI 109)

N 17.4 Develop and maintain a detailed, comprehensive noise data base. (AI 106)

N 17.5 Develop and update County Noise Inventories using the following steps.

a. Identify Noise Sources and Noise-sensitive Land Uses

b. Continue to identify various agency responsibilities; review noise complaint files; and conduct noise surveys and monitoring as needed.

N 17.6 Identify those areas of the County affected by high noise levels. (AI

106, 107, 109)

N 17.7 Evaluate current land uses to identify potential noise conflict areas. (AI 106, 107, 109)

N 17.8 Gather activity operations' data of noise sources; prepare analytical noise exposure models to develop existing and projected noise contours around major noise sources down to 50 CNEL. (AI 109)

N 17.9 Encourage greater involvement of other County departments in the identification, measurement, and reduction of noise hazards throughout the County, including: Building and Safety Department, Aviation Department, and the Department of Public Health-Office of Industrial Hygiene.

Public Noise Information

Policies:

N 18.1 Provide information to the public regarding the health effects of high noise levels and means of mitigating such levels. (AI 109)

N 18.2 Cooperate with industry to develop public information programs on noise abatement. (AI 108)

N 18.3 Condition that prospective purchasers or end users of property be notified of overflight, sight, and sound of routine aircraft operations by all effective means, including:a.requiring new residential subdivisions that are located within the 60 CNEL contour or are subject to overflight, sight, and sound of aircraft from any airport, to have such information included in the State of California Final Subdivision Public Report.

b. requiring that Declaration and Notification of Aircraft Noise and Environmental Impacts be recorded and made available to prospective purchasers or end users of property located within the 60 CNEL noise contour for any airport or air station or is subject to routine aircraft overflight. (AI 109)

N 18.4 Promote increased awareness concerning the effects of noise and suggest methods by which the public can be of assistance in reducing noise.

N 18.5 Require new developments that have the potential to generate significant noise impacts to inform impacted users on the effects of these impacts during the environmental review process. (AI 106, 107)

EXHIBIT Q

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Sound Walls: Absorptive versus reflective design and effectiveness

ABSTRACT

The overlap of commercial development and urban residential sprawl has created an intense awareness of noise in America, and a demand for better noise abatement practices. The primary noise sources which elicit the most fervent public resistance are road & traffic noise, and commercial developments including the explosive trend in Big Box stores. Sound barrier walls have been one of the most common and effective abatement treatments for such applications. Due to the availability and relatively low cost, reflective materials like concrete, brick or block have been the traditional manufacturing components of sound walls. As the public's knowledge of noise and noise treatments has evolved, however, so has its demand for more efficient sound wall performance. As a result, sound walls comprised of absorptive materials have grown in popularity amongst architects, developers, contractors and the general public. Thus there is an ongoing, vigorous discussion on the differences between absorptive and reflective sound walls, and which type is best suited for specific applications.

1 INTRODUCTION

Sound barriers are an effective means to reduce the noise impact from sound sources affecting sound-sensitive receivers. Common sound sources include roads & highways, retail and big-box developments, mechanical & hvac equipment, construction sites, etc. Receivers may include homes or apartments, schools, hospitals, office buildings or even public parks. When noise becomes an issue between such sources and receivers, the use of sound barriers may be an ideal solution.





Sound walls are use in many applications around the world, including DOT projects and "big-box" stores.

2 SOUND BARRIERS – REALISTIC EXPECTATIONS

Although often overlooked, sound barriers can be an effective sound attenuation and noise reduction option. Sound barriers are most effective at mid- and high-frequencies, while low frequency sounds may require the use of longer and taller sound walls for mitigation.

While the sound insertion loss of a sound barrier can be limited, it can be often optimized to provide sufficient reduction of the offensive sounds. The height and length relationship of sound barriers is well documented. At a minimum, the sound barrier should at least block the line-of-sight between the sound source and the receiver. Additionally, the sound waves that travel around the ends and over the top of the sound barrier can be significant, as well as the sound waves reflecting off of other nearby buildings and structures as shown in Figure 1.

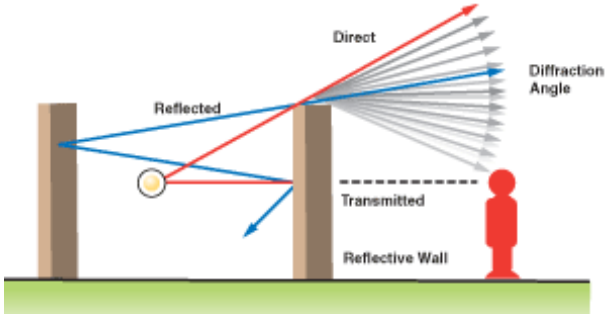

Figure 1: Sound waves not directly blocked by sound wall can travel around and over to the Receiver.

The key noise mitigation factor of a sound wall is the mass of the wall structure. It must be sufficiently dense to eliminate sound waves from traveling through it. Since design factors such as wind-loading inherently contribute to the mass of the wall's design, most of today's top-performing sound walls meet this minimum-mass level. This leaves only the noise that travels over or around the wall to contend with. As long as the sound transmitted through the barrier is at least 10 decibels (dB) below what is diffracted and transmitted over the top, the sound barrier has sufficient mass.

In general, the rules of thumb for sound barriers are easy to remember and fairly accurate: Up to 10 dB of sound reduction is fairly straightforward to obtain. A range of 15-17 dB is practical to obtain. But more than 20 dB of reduction is difficult to obtain, and more than 25 dB is impossible to obtain.

3 BENEFITS OF SOUND ABSORPTION ON SOUND BARRIERS

A key factor that is often overlooked on sound barrier selection is the effect of the surface design on overall performance. Most common building materials such as wood, metal and masonry have hard surfaces and thus reflect sound. i.e. they are considered "Reflective" barriers. Thus when sound strikes the surface of a reflective barrier, some energy is transmitted through the wall but the bulk is reflected back in the general direction of the noise source. Depending upon the roughness and shape of the surface, (and the wavelength of the sound), the sound may be fractured in different directions.

As with interior building materials, the use of sound absorptive materials in a sound wall can be beneficial in eliminating unwanted noise. Additionally, the physical geometry and location of the barriers can impact sound mitigation. For example, having two reflective sound walls – one on each side of a roadway – forms a "sound canyon" resonating with reflective sound from and between each wall, see Figure 2. The same configuration using absorptive sound walls eliminates such reflected noise. This is an obvious example of an application where the use of an absorptive sound wall should be considered.

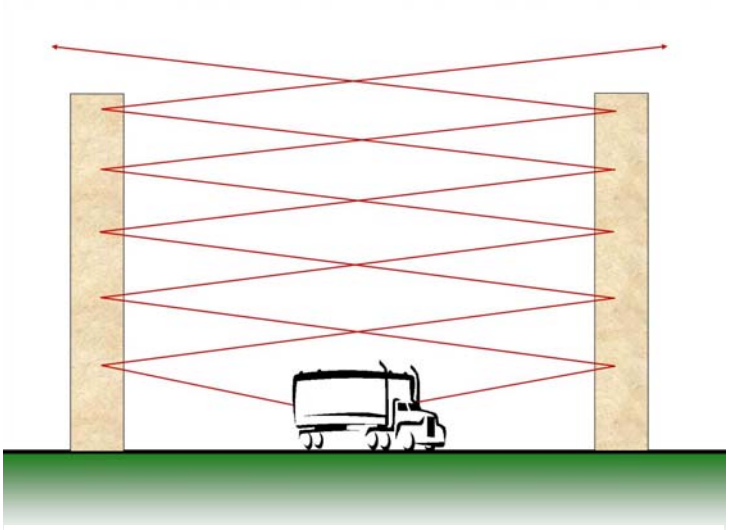

Figure 2: Reflective parallel barriers cause sound to reverberate between them; a process which is eliminated with the use of absorptive barriers.

And there are other situations favoring the use of absorptive barriers that are not quite as obvious. Here are two such examples:

3.1 Service Drive and Roadway Sound Barriers

Consider the placement of a sound barrier between some houses and the back of a shopping center, see Figure 3. The drives behind the stores are often used for deliveries by medium "bob tail" trucks and heavy delivery or even over the road "semi" trucks with tall side trailers. The truck engine and running gear are perhaps at a nominal 6' tall but the trailers are 10 to 12' tall. Thus as truck moves through one of the drives the sound reflects between the side of the truck and trailer and the sound barrier wall. Sound travels at over 1,000 fps so there will be multiple reflections of sound between the two that produces a reverberant sound buildup. Thus the sound levels are increased and also the height of the sound source is effectively increased.

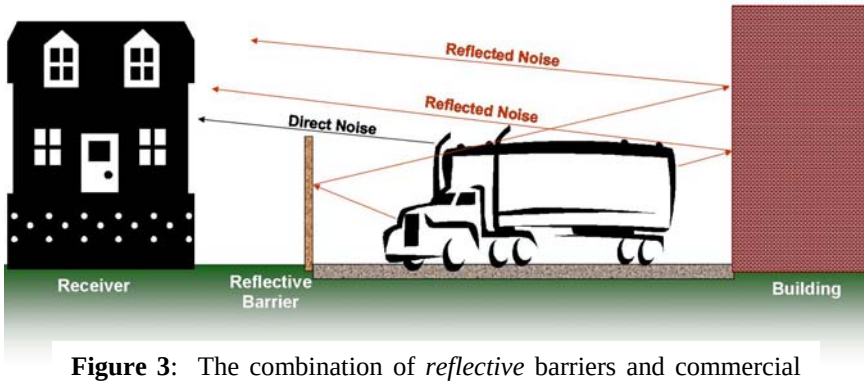

Figure 3: The combination of *reflective* barriers and commercial buildings often increase noise to the Receiver via unintended reflective sound waves.

Reflection is a critical factor when the vehicle is almost as tall as the wall or, in many cases, taller than the wall. The sound levels at the receiver can be easily increased perhaps 3 to 5 dB, and some times up to 7 dB via reflective noise. Therefore the designed sound barrier provided only 3 to 5 dB of sound attenuation in the field, where more than 10 dB was expected. Use of acoustical absorption on the source side of the sound barrier wall would have provided the desired level of performance, see Figure 4. The same type of condition would apply to a roadway barrier with semi truck traffic on the street or highway and houses on the receiver side of the wall.

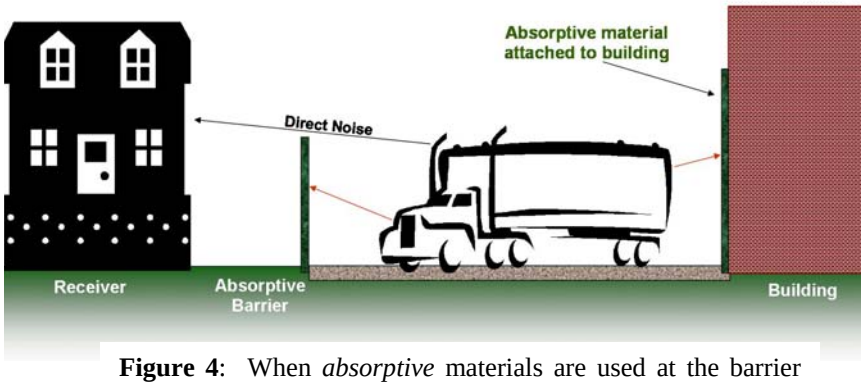

Figure 4: When *absorptive* materials are used at the barrier and on the building, reflected sound is minimized, significantly reducing noise at the Receiver.

3.2 Mechanical Equipment Noise

Consider the placement of mechanical and hvac equipment such as air cooled outdoor chillers, cooling towers, and emergency engine/generators. Often the pieces of equipment are placed behind or beside an industrial, hospital, educational or commercial building. This equipment is usually close to a property line. When residential homes and apartments are adjacent to such commercial property, specific (low) sound levels are mandated due to zoning regulations. Sound level limits in the 45 to 50 dBA range at night are not unusual. Many times simply meeting zoning requirement is not enough to eliminate nuisance complaints from neighbors, so sound levels approaching the general background sounds are desired.

In many cases, screen walls are typically used to hide the equipment, see Figure 5. Since there is a significant amount of sound reduction needed, these walls also need to serve double-duty as a sound barrier. Screen walls comprised of reflective materials like concrete, metal, wood or brick will often create sound buildup in the receiver's area due to sound reflecting off of the screen walls and the sides of the building, which are typically reflective and much taller than the screen wall.

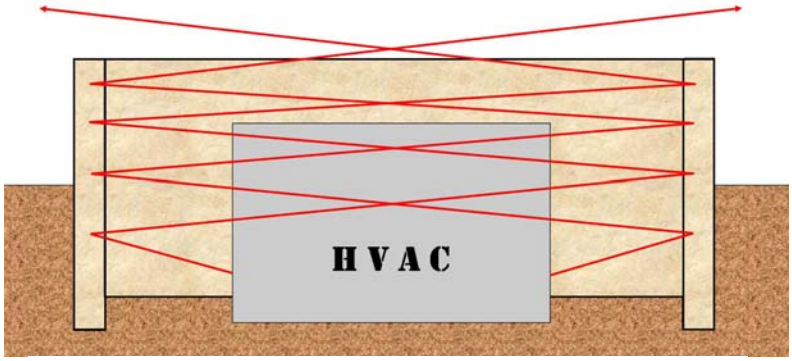

Figure 5: Reflective sound enclosures and architectural screens simply redirect unwanted sound waves, and can actually *increase* noise via unintentional redirected sound

It is imperative to use acoustical absorption on the source side of such enclosures, see Figure 6. In addition, supplemental use of acoustical absorption on the side of the building may also be required. Reflection of 3 to 5 dB or higher is often generated off the building. If that reflection is removed, that is sound that the sound barrier itself does not have to overcome.

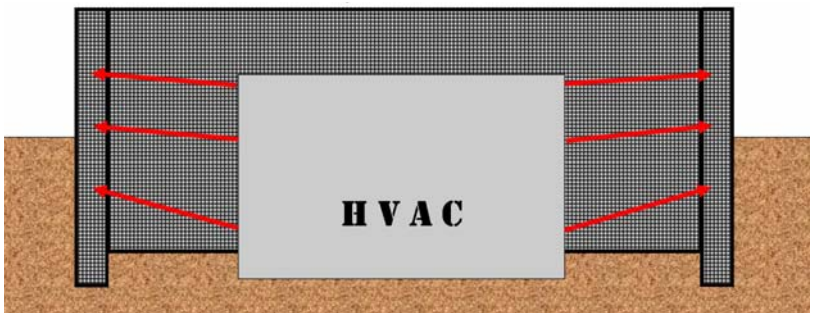

Figure 6: *Absorptive* sound enclosures and architectural screens actually absorb sound waves, minimizing the affect of unintentional, unwanted noise.

4 ABSORPTIVE SOUND BARRIERS

There are several varieties of sound absorptive barriers. Most consist of a hard material such as HDPE, wood, sheet metal and masonry for the basic construction to provide the sound transmission loss. The acoustical absorptive materials are also varied. The majority make use of fibrous material such as fiberglass and mineral wool. These products will not “wick or wet” and retain moisture. Thus even when rained upon the surface will dry. Provisions must be made in the panel design not to trap water in formed channels or elsewhere in the wall. The acoustical absorptive material can be selected to provide a significant amount of sound absorption on a wide frequency range, with 2” to 4” being perhaps typical thicknesses, see Figure 7. The amount of lower frequency sound absorption increases with increased thicknesses. Use of un-faced materials are probably best so as not to reduce the higher frequency absorption.

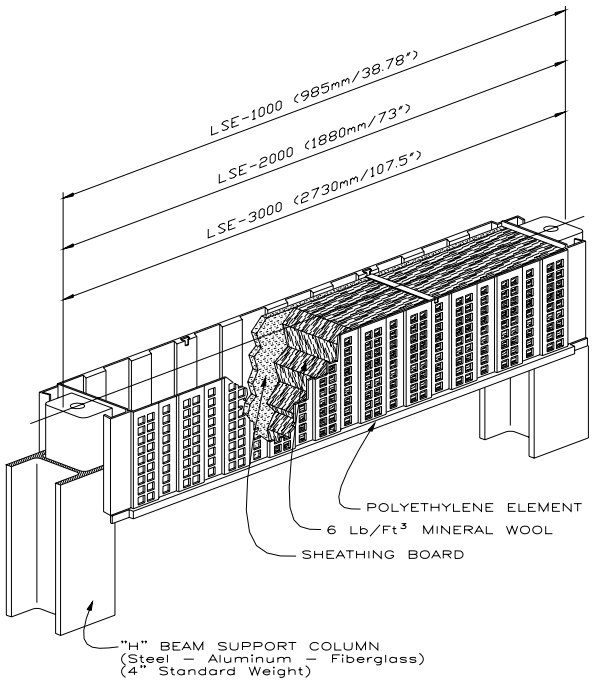

Figure 7: The design of an absorptive sound wall includes multiple elements engineered to dampen incoming sound waves..

5 SUMMARY

There are many designs and variances of sound barrier wall design, material and construction. As with any other building material, the cost and benefits must be considered. The use of acoustical absorptive sound barriers is a cost effective solution where reverberant and reflective sound reduction is needed to maximize overall noise mitigation.

6 ACKNOWLEDGMENTS

Sound Fighter Systems, LLC would like to acknowledge Mr. Ted Carnes with the Acoustic Consultancy of Pelton, Marsh, Kinsella for his contributions to this presentation.

Sound Fighter Systems, LLC would like to than HINS, Inc. for their graphic and textual contributions to this presentation.

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