Draft
South Central Specific Plan and EIR
Public Comments
May 31, 2024 - July 30, 2024

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Public Comment from the SCSP and EIR Open House - July 23, 2024

Name	Phone #	Email	Address and Nearest Cross Street	Comment	Pertains to
Kyle Ridderling	[redacted]	[redacted]	[redacted]	I have concerns about the spot zoning and the effect it will have on development feasibility of surrounding parcel.	SCSP
			[redacted]	The truck study needs to include zoning recommendations. The Regulated Areas need to have lower uses of NMX not BP or regional BP.	Truck Route Study
Tyler Kelly	[redacted]	[redacted]	[redacted]	Residential buffer zones should have to meet certain density requirements to exist. Future development in the Angus and Annadale area could be hindered due to just two small houses that are already surrounded by existing industrial.	SCSP
Alma	[redacted]	[redacted]		The dynamic impact and look interesting but we need to see how it affects the community and area around.	SCSP
Terry Hirschfield	[redacted]	[redacted]	[redacted]	Everything along Cherry and Central should be zoned neighborhood mixed-use. Not BP or RBP. No trucks on Cherry between North and Central Avenues	SCSP

July 30, 2024

City of Fresno
Planning & Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Attn: Sophia Pagoulatos, Planning Manager

Re: South Central Specific Plan (SCSP)

This letter is being submitted on behalf of Affinity Truck Center. We are a Volvo, Mack and Autocar dealership with expert knowledge of both combustion engines and electric vehicles in this industry. Our intent in writing this is to express our concerns relating to the SCSP as currently drafted.

Affinity Truck Center has been located in the heart of California's Central Valley since 1980. We carry a wide variety of Class 6-8 heavy duty trucks to handle a vast array of trucking needs. We offer a complete line of Mack, Volvo and Autocar heavy duty trucks. We have always placed the needs and interests of our customers first with our first-class sales, parts and service departments. Being in the South Central Fresno area for the last 44 years has allowed us to be of exceptional service to individuals and businesses that farm and transport goods along our stretch of the Valley as well as keep goods moving throughout the entire State and Nation. In addition, many of our long-time employees reside in this and our neighboring communities. Affinity Truck Center places a high importance on giving back to our community by donating our time and resources to charitable organizations such as the Boys & Girls Clubs, Tree Fresno and Beautify Fresno, which directly and positively impact our neighborhood, as well as offering volunteer opportunities to our employees.

With regard to the SCSP document as drafted, as well as the Environment Impact Report (EIR), we take issue with some of the following points. I cannot tell from the draft of the SCSP whether the regulations only apply to new construction or anyone in the area pulling a permit to remodel.

Required Transition to Zero Emissions Trucks:

- All future tenants of new and redeveloped commercial and industrial land uses must ensure all Class 7 and 8 trucks are "model year 2014 or later . . . ." After December 31, 2026, all trucks must be transitioned to "zero-emission vehicles," subject to the Planning Director's discretion. (SCSP EIR, Mitigation Measure 4.2-1h.) The developer or the business is also responsible for ensuring "that adequate electrical infrastructure is provided to allow for the transition to electric heavy-duty trucks." (*Id.*)

    - This is far more aggressive than CARB's Advanced Clean Fleets ("ACF") regulation, which allows high-priority fleets to purchase at least some trucks other ZEVs until 2035.

- Moreover, unlike the ACF regulation, which only applies to some fleets, the City's Mitigation Measure applies to ***all*** discretionary permits for commercial and industrial land uses within the SCSP.

- The City requires an equally aggressive phase-in schedule (more aggressive than CARB's ACF regulation) for Class 2-6 Trucks, requiring full electrification of the fleet by December 31, 2031. (SCSP EIR, Mitigation Measure 4.3-1i.)

I sit as the Volvo Board of Line rep and the California Truck Dealer board seat representing all brands. We have sold Class 8 electric vehicles for 3 years. The CARB regulations of today are unattainable, let alone the overly aggressive timelines in this draft. See the Ryder Charge Logistics cost comparisons.

We have been attempting to install charging stations for Electric Vehicles in our two dealerships for 3 years. Our Fresno project is stuck in permitting again with the City of Fresno and we have had the 480 amp power in our yard for 20 years. As of today, without the use of grants, most chargers take 18 months to 2 years from conception to installation. Any grants delay the process further.

The cost of a Class 8 electric vehicle ranges from $400,000 to $700,000. The total cost of ownership of an electric vehicle is not yet affordable to all operators. The range is limited. If a business uses any commercial trucks with a body on the chassis that does work of any kind, there is not an electric version available as yet. Boom truck, dump truck, walking floor anything with a power take off unit does not have an electric option available from an OEM.

Follow the CARB regulations at a minimum and push back if they push back.

Mandate the use of renewable diesel effective today in current diesel internal combustion engines. It has a -99 carbon footprint and requires no new equipment or modification. The has a tremendous impact until owners fall in line with CARB regulations.

<u>Promotion of Passenger EVs for Customers/Employees</u>:

- "At least 10% of all passenger vehicle parking spaces shall be electric vehicle (EV) ready," and at "least 5% of all passenger vehicle parking shall be equipped with working Level 2 Quick charge EV charging stations installed and operational, prior to building occupancy," regardless of employee or customer demand for such spaces. (SCSP at 75.)

There are no car buying mandates and it remains consumer choice to purchase EV vs. gas/diesel or hybrid. Read the industry trades on all the pull back on interest and production in EVs. Installation is delayed. Maintenance is late to repair malfunction. The arms of chargers are cut off for the copper value. In these neighborhoods for the coming years, you do not want people alone at businesses charging, so do not make these 24 hour public access. Do all of these

chargers have sophisticated software systems that allow for customers to pay to charge, as it is not appropriate to have businesses pay for this charging?

Zero Emissions Equipment:

- "On-site motorized operational equipment shall be ZE (zero emission)." (SCSP at 75.)

Forklifts, yard goats, stationary engines, Calls 2b vehicles all operate exceptionally well as electric and require smaller charging infrastructure to operate. This seems reasonable if it is a fully new business. If it is an existing business pulling a permit, they should only have to follow CARB regulations.

Construction Fleets/Equipment/Materials:

- All "construction contractors shall demonstrate that they shall use the cleanest available fleet of heavy-duty equipment" after submitting "Construction Clean Fleet" paperwork to the San Joaquin Valley Air Pollution Control District. And "[a]ll on-site yard trucks and forklift shall be powered by electricity." (SCSP EIR, Mitigation Measure 4.3-1B.)

- The SCSP requires an applicant to "deploy the highest rated CARB Tier Technology that is available at the time of construction," subject to discretionary waivers by the Planning Director. (SCSP at 76.)

- The required use of "electric-powered hand tools, forklifts, and pressure washers." (SCSP at 76.)

- Prohibition of diesel-powered generators for construction. (SCSP at 76.)

- Required to use at least 20% locally sources or recycled materials for construction materials, and wood products used should be certified through a sustained forestry program. (SCSP EIR, Mitigation Measure 4.8-1b.)

If the building is not yet constructed, how will all the equipment charge at the construction site? Heavy machinery with moving arms do not have an electric version. Have you done a cost analysis on the construction cost if contractors have to be in compliance in advance of CARB regulations. The bids will be incredibly inflated to cover the cost of this equipment that is purchased before there is cost parity.

I must sell 1 electric vehicle to earn the right to sell one diesel vehicle. Where are these construction companies going to purchase these Tier 1 CARB compliant diesel trucks if the OEMs and dealers have not sold enough Class 8 electric vehicles? There is a devastating shortage of diesel vehicles (90% reduction of inventory) for sale in the State of California from any brand of dealer. We have not sold one 2025 Teir 1 CARB compliant vehicle in the first 7 months of this calendar year.

Other Infrastructure Improvements:

- Unless a property owner records a covenant stating the property prohibiting refrigerated warehouse space, "a conduit shall be installed during construction of the building shell from the electrical room to 100% of the loading dock doors that have the potential to serve refrigerated space." In addition, all dock doors serving TRU units must include "electric plug-in units." (SCSP at 75.)

- The construction of a secondary electrical room (or sizing one electrical room 25% larger than required) to accommodate additional electrical panels. (SCSP at 76.)

- For all industrial land uses that do not use natural gas as part of a manufacturing process, "no natural gas infrastructure shall be permitted." (SCSP EIR, Mitigation Measure 4.3-1k.)

The world and the nation (EPA) are all pursuing research and development into the most cost effect and environmentally friendly solutions for transportation. CARB has hitched their regulations to only Battery Electric and it is failing at this initial stage. What if CARB pushes back to Federal Regulations (EPA) which are technologically agnostic? What will be done with all those underutilized chargers at the warehouses?

Solar Infrastructure:

- Buildings over 400,000 square feet must "ensure rooftop solar panels are installed and operated in such a manner that they will supply 100% of the power needed to operate [the non-refrigerated] portions of the facility including the parking areas." (SCSP at 75.)

    - All other buildings shall have solar-ready roofs, "which includes designing and constructing buildings in a manner that facilitates and optimizes the installation of a rooftop solar photovoltaic (PV) system at some point after the building has been constructed." (SCSP at 75.)

    - All other buildings must "demonstrate their capacity to include energy production and storage features on-site, including" on-site solar panels. The amount of renewable energy needed is based on the needs of the development, serving at a minimum 50% of the energy demand. (SCSP EIR, Mitigation Measure 4.6-1d.)

Our dealerships have solar on their roof as well as on a custom solar structure under which our technicians repair vehicles. In spite of 25 year warranty roof material and joint working arrangements with the solar installers and roofers, every winter we have emergency roof leaks. Many roof repairs and replacements require the solar to be removed and reset at great expense. I would encourage over parking or on ground solar wherever possible.

Further Studies:

- Business owners and/or their consultants must perform noise studies for any new development, regardless of how close they are to sensitive receptors. (SCSP EIR, Mitigation Measure 4.12-2a.)

I encourage you to stand at an EV charging site with 1-10 kWh chargers. Do you know that the engine fan on the Class 8 trucks must run while the trucks charge? We think of electric trucks as quiet, but while charging they create incredible noise pollution.

Please understand that Battery Electric vehicles run hot. They loss function and range when the environment it operates in is too cold or too hot. Much of the software and function of these Electric Vehicles is set to derate and shut down when temperatures exceed 110 degrees.

The chargers themselves shut down in the heat.

Think how hot it has been in Fresno over the past month alone. The vehicles and chargers failed when air temps, let alone tarmac temps hit 113.

I am not anti EV. There are incredible use cases where you would not want anything else. This is primarily in light and medium duty at this time 2b-Class 6.

Do not put Frenso in a box where they are handicapped to grow or attract new business because the EV technology is unaffordable, unavailable, or under engineered.

I am free for any clarification or follow-up questions you may have on electric vehicle technology.

Sincerely,

Kim Mesfin
President

559-262-1502

CHARGED LOGISTICS:

The cost of electric vehicle conversion for U.S. commercial fleets

EXECUTIVE SUMMARY

With evolving state and federal legal requirements, and potential mandates, aimed at converting commercial diesel vehicles to zero-emission vehicles (ZEV), Ryder customers frequently ask about the costs and benefits of incorporating electric vehicles (EV) into their fleets. As a result, Ryder conducted this analysis to determine the cost of EV conversion in today's market. In the analysis:

- Ryder analyzed the total cost to transport (TCT), in one-to-one comparisons, for transitioning Class 4 (light-duty), Class 6 (medium-duty), and Class 8 (heavy-duty) vehicles operating in California and Georgia from internal combustion engines (ICE) to EVs in today's market.
- Then, because most companies have more than one commercial vehicle, Ryder examined the TCT for transitioning a mixed fleet (light, medium, and heavy) of 25 ICE vehicles to EVs. The mix was based on the overall mix of commercial vehicles in the U.S. according to Polk Data Services.
- The analysis is based on representative network loads and routes from Ryder's dedicated fleet operations, which includes more than 13,000 commercial vehicles and professional drivers, as well as the impact of EV charging time and maximum payload to achieve equivalent delivery times.
- Our quantitative results show a relatively modest increase of up to 5% for light-duty EVs, and increases from 94% to 114% to convert heavy-duty trucks and from 56% to 67% to convert mixed fleets.
- Assuming that the price of goods would increase due to higher transportation costs, based on the cost impact to convert a mixed fleet from ICE to EV, we estimate these increases could cumulatively add approximately 0.5% to 1% to overall inflation.

INTRODUCTION

Ryder is at the forefront of identifying new technology for operational advancements and acts as an extended research and development arm for our suppliers and customers. Moreover, we are at the table with regulators, vehicle manufacturers, technology innovators, and industry peers as we discuss ways the industry can implement potential solutions. While Ryder is actively involved in the testing and successful deployment of EVs and charging infrastructure – as well as other alternative fuels – Ryder views the rapidly evolving transportation landscape through the lens of one of the longest-running and largest fleet owners in North America, with over 90 years of experience in truck transportation and nearly 250,000 commercial vehicles under management. With more than 41,000 commercial customers in its portfolio today, Ryder utilizes its expertise to implement logistics and transportation solutions for businesses across most industries.

With this in mind, using extensive Ryder historical data and current market prices for electric and ICE vehicles and charging infrastructure, Ryder examined the potential economic impacts of implementing an all-EV fleet. Ryder analyzed the impact in California and Georgia, as electricity, fuel, and labor costs range from some of the highest in the country to more modest. Ultimately, the analysis set out to understand the cost of electrifying a fleet and the potential impacts on businesses and consumers.

[1]Economics and Industry Data, American Trucking Associations (2022), https://www.trucking.org/economics-and-industry-data

TCT ANALYSIS: Objective and Variables

To understand the economic impacts of utilizing EVs in place of ICE vehicles, Ryder first examined the TCT for Class 4 light-duty transit vans, Class 6 medium-duty straight trucks, and Class 8 heavy-duty tractors.

Using quantitative data from representative network loads and routes from Ryder's dedicated transportation operating models, which include approximately 13,000 vehicles and professional drivers, the analysis factored in the cost of the vehicle, maintenance, drivers, range, payload, diesel fuel versus electricity, and the required EV charging time. It is important to note that the analysis assumes the accessibility and use of the fastest applicable commercial vehicle chargers – though this network infrastructure is not yet built out.

First, Ryder conducted a one-to-one analysis of a single vehicle (ICE vs. EV) in each of the light-, medium-, and heavy-duty classes using cost assumptions from California, where fuel, electricity, and labor are typically the highest in the nation, and Georgia, where cost assumptions are more favorable.

Then, as most companies have more than one vehicle, Ryder applied the individual costs to a fleet of 25 vehicles of mixed classes and types, and compared the cost of owning and operating that fleet in California and Georgia. The fleet mix is based on the overall mix of commercial vehicles in the U.S., according to third-party data, and includes 11 light-duty vans, four medium-duty straight trucks, and 10 heavy-duty tractors.

The analysis factors in a number of variables and other assumptions, including the average labor costs for California and Georgia. It also assumes fixed monthly tractor costs based on actual freight management system equipment pricing and lower EV maintenance costs, compared to ICE maintenance costs, due to fewer moving parts and no need to change oil or diesel exhaust fluid. The analysis estimates EV energy costs using current assessment models and fuel costs of $6.13 per gallon in California and $4.19 per gallon in Georgia. The cost of hardware, installation, and maintenance of EV chargers reflects actual infrastructure projects at current Ryder locations amortized over the life of the charger and multiple power units. The analysis estimates insurance and other general and administrative expenses (G&A) to be equal for one ICE unit and one EV unit.

CLASS 4
One-to-One Comparison

The Class 4 comparison assumes short-haul deliveries of about 80 miles, two trips per day, about 40,000 miles annually, and one local Class C driver per vehicle. The average payload for each is 2,500 pounds.

The first chart shows the comparison results for a single ICE transit van versus an EV transit van in California. The annual cost to convert to an EV is estimated at just under $5,000 or a 3% increase. While the cost of the vehicle is 71% more and labor is 19% more due to additional hours of service for EV charging time, fuel vs. energy and maintenance costs decrease 71% and 22% respectively, resulting in a relatively modest increase in TCT.

CALIFORNIA

1 Driver - 1 Van			1 Driver - 1 Van			
	ICE VANS		EV VANS		VARIANCE	
Category	Cost Detail	Amount	Cost Detail	Amount	Variance	% Change
Labor Cost	1 driver, $23/hr @ 48 hours weekly	$62,192	1 driver, $23/hr @ 55 hours weekly	$74,032	$11,840	19%
Other Personnel Costs	PTO, Payroll Tax, Workers Comp	$30,441	PTO, Payroll Tax, Workers Comp	$33,115	$2,674	9%
Equipment Cost*	1 van, $1,030/month per unit	$12,360	1 van, $1,766/month per unit	$21,192	$8,832	71%
Equipment Maintenance Cost*	$0.09/mile	$3,805	$0.07/mile	$2,959	$(846)	(22%)
Fuel vs. Energy Cost	$0.67/mile fuel cost, 9.1 MPG	$28,479	$0.19/mile energy cost	$8,158	$(20,321)	(71%)
EV Charger Cost	N/A	$ –	$124k hardware, installation, maintenance	$2,756	$2,756	–
Other Operating Costs	1 van, insurance, G&A, CVCs, etc.	$34,046	1 van, insurance, G&A, CVCs, etc.	$34,046	$ –	0%
Total	**Annual TCT**	**$171,323**	**Annual TCT**	**$176,258**	**$4,935**	**3%**

3% TOTAL COST INCREASE

The second chart shows the comparison results in Georgia in which the TCT for an ICE vehicle and is estimated to have a variance of nearly $8,000 or an increase of approximately 5%. The variance in Georgia is greater than California due to the difference between gas and energy costs in each state.

GEORGIA

1 Driver - 1 Van			1 Driver - 1 Van			
	ICE VANS		EV VANS		VARIANCE	
Category	Cost Detail	Amount	Cost Detail	Amount	Variance	% Change
Labor Cost	1 driver, $22/hr @ 48 hours weekly	$58,535	1 driver, $22/hr @ 55 hours weekly	$70,071	$11,536	20%
Other Personnel Costs	PTO, Payroll Tax, Workers Comp	$29,616	PTO, Payroll Tax, Workers Comp	$32,220	$2,604	9%
Equipment Cost*	1 van, $1,030/month per unit	$12,360	1 van, $1,766/month per unit	$21,192	$8,832	71%
Equipment Maintenance Cost*	$0.09/mile	$3,805	$0.07/mile	$2,959	$(846)	(22%)
Fuel vs. Energy Cost	$0.44/mile fuel cost, 9.1 MPG	$18,649	$0.04/mile energy cost	$1,694	$(16,955)	(91%)
EV Charger Cost	N/A	$ –	$124k hardware, installation, maintenance	$2,756	$2,756	–
Other Operating Costs	1 van, insurance, G&A, CVCs, etc.	$33,075	1 van, Insurance, G&A, CVCs, etc.	$33,075	$ –	0%
Total	**Annual TCT**	**$156,040**	**Annual TCT**	**$163,967**	**$7,927**	**5%**

5% TOTAL COST INCREASE

* Equipment and maintenance costs are averages

CLASS 6
One-to-One Comparison

The Class 6 comparison assumes short to medium hauls from 100 to 230 miles, one to two trips per day, about 55,000 miles annually, and one local Class B driver per vehicle. The average payload is 11,000 pounds.

The first chart below shows the comparison results for a single ICE straight truck and an equivalent EV in California. The annual TCT to convert to an EV is approximately $48,000 or nearly 22% higher. The cost of the vehicle increases 216%, which is only partially offset by a 57% savings in fuel and energy costs and 22% savings on maintenance.

CALIFORNIA

	1 Driver - 1 Truck		1 Driver - 1 Truck			
	ICE TRUCKS		EV TRUCKS		VARIANCE	
Category	**Cost Detail**	**Amount**	**Cost Detail**	**Amount**	**Variance**	**% Change**
Labor Cost	1 driver, $27/hr @ 48 hours weekly	$73,008	1 driver, $27/hr @ 51 hours weekly	$78,589	$5,581	8%
Other Personnel Costs	PTO, Payroll Tax, Workers Comp	$32,884	PTO, Payroll Tax, Workers Comp	$34,144	$1,260	4%
Equipment Cost*	1 truck, $2,364/month per unit	$28,366	1 truck, $7,466/month per unit	$89,592	$61,226	216%
Equipment Maintenance Cost*	$0.09/mile	$5,171	$0.07/mile	$4,022	$(1,149)	(22%)
Fuel vs. Energy Cost	$0.67/mile fuel cost, 9.1 MPG	$38,707	$0.29/mile energy cost	$16,700	$(22,007)	(57%)
EV Charger Cost	N/A	$ –	$186k hardware, installation, maintenance	$2,657	$2,657	–
Other Operating Costs	1 truck, insurance, G&A, CVCs, etc.	$42,411	1 truck, insurance, G&A, CVCs, etc.	$42,411	$ –	0%
Total	**Annual TCT**	**$220,547**	**Annual TCT**	**$268,115**	**$47,568**	**22%**

22% TOTAL COST INCREASE

The second chart shows the comparison results in Georgia, where the annual TCT convert to an EV is estimated to increase nearly $54,000 or almost 28%. As in the Class 4 comparison, the variance in Georgia is greater than California due to the difference between gas and energy costs in each state. Once again, the variance in Georgia is greater than California due to the difference between gas and energy costs in each state.

GEORGIA

	1 Driver - 1 Truck		1 Driver - 1 Truck			
	ICE TRUCKS		EV TRUCKS		VARIANCE	
Category	**Cost Detail**	**Amount**	**Cost Detail**	**Amount**	**Variance**	**% Change**
Labor Cost	1 driver, $24/hr @ 48 hours weekly	$63,625	1 driver, $24/hr @ 51 hours weekly	$68,349	$4,724	7%
Other Personnel Costs	PTO, Payroll Tax, Workers Comp	$30,765	PTO, Payroll Tax, Workers Comp	$31,831	$1,066	3%
Equipment Cost*	1 truck, $2,364/month per unit	$28,366	1 truck, $7,466/month per unit	$89,592	$61,226	216%
Equipment Maintenance Cost*	$0.09/mile	$5,171	$0.07/mile	$4,022	$(1,149)	(22%)
Fuel vs. Energy Cost	$0.44/mile fuel cost, 9.1 MPG	$25,346	$0.18/mile energy cost	$10,236	$(15,110)	(60%)
EV Charger Cost	N/A	$ –	$186k hardware, installation, maintenance	$2,657	$2,657	–
Other Operating Costs	1 truck, insurance, G&A, CVCs, etc.	$40,494	1 truck, Insurance, G&A, CVCs, etc.	$40,494	$ –	0%
Total	**Annual TCT**	**$193,767**	**Annual TCT**	**$247,181**	**$53,414**	**28%**

28% TOTAL COST INCREASE

* Equipment and maintenance costs are averages

CLASS 8
One-to-One Comparison

The Class 8 comparison assumes hauls ranging from 100 to 500 miles, one to two trips per day, about 109,000 miles annually, and 1.2 local Class A drivers per diesel vehicle (typical for an ICE unit in Ryder's dedication transportation operations). The average payload in this scenario is 29,000 pounds for an ICE unit. At this time, the maximum payload for an EV is approximately 22,000 pounds. Given the payload differences between ICE and EV heavy-duty commercial vehicles, as well as accounting for EV charging time and equivalent delivery times, Ryder estimates that nearly two EVs and more than two drivers are needed to equal the output of one ICE vehicle.

The first chart shows the comparison results for a single ICE heavy-duty tractor and equivalent EV in California. Due to the increased number of tractors and drivers needed, the annual TCT to convert to EVs is nearly double, with a variance of $314,000 or 94%. The cost of the vehicles is the largest contributor at more than 500%, followed by operating costs at 87%, labor costs at 76%, and other personnel costs at 74%. Fuel and energy savings are 52%.

CALIFORNIA

1.2 Drivers - 1 Tractor			2.07 Drivers - 1.87 Tractors			
	ICE TRUCKS		EV TRUCKS		VARIANCE	
Category	Cost Detail	Amount	Cost Detail	Amount	Variance	% Change
Labor Cost	1.2 drivers, $29/hr, ~58 hours/week	$93,285	2.07 drivers, $30/hr, ~97 hours/week	$164,151	$70,866	76%
Other Personnel Costs	PTO, Payroll Tax, Workers Comp	$40,742	PTO, Payroll Tax, Workers Comp	$70,955	$30,213	74%
Equipment Cost*	1 tractor, $3,444/month per unit	$41,328	1.87 tractors, $11,091/month per unit	$248,438	$207,110	501%
Equipment Maintenance Cost*	$0.065/mile	$7,097	$0.06/mile	$8,734	$1,637	23%
Fuel vs. Energy Cost	$0.89/mile fuel cost, 6.9 MPG	$96,997	$0.32/mile energy cost	$46,126	$(50,871)	(52%)
EV Charger Cost	N/A	$ –	$186k hardware, installation, maintenance	$8,267	$8,267	–
Other Operating Costs	1 tractor, insurance, G&A, CVCs, etc.	$54,665	1.87 tractors, insurance, G&A, CVCs, etc.	$102,041	$47,376	87%
Total	**Annual TCT**	**$334,114**	**Annual TCT**	**$648,712**	**$314,598**	**94%**

94% TOTAL COST INCREASE

The second chart shows the comparison results in Georgia in which the TCT for an ICE vehicle versus an EV shows a variance of more than $330,000 or just under 114%. Here again, the variance in Georgia is greater than California due to the difference between gas and energy costs in each state.

GEORGIA

1.2 Drivers - 1 Tractor			2.07 Drivers - 1.87 Tractors			
	ICE TRUCKS		EV TRUCKS		VARIANCE	
Category	Cost Detail	Amount	Cost Detail	Amount	Variance	% Change
Labor Cost	1.2 drivers, $27/hr, ~58 hours/week	$87,090	2.07 drivers, $30/hr, ~97 hours/week	$156,179	$69,089	79%
Other Personnel Costs	PTO, Payroll Tax, Workers Comp	$39,343	PTO, Payroll Tax, Workers Comp	$69,155	$29,812	76%
Equipment Cost*	1 tractor, $3,444/month per unit	$41,328	1.87 tractors, $11,091/month per unit	$248,438	$207,110	501%
Equipment Maintenance Cost*	$0.065/mile	$7,097	$0.06/mile	$8,734	$1,637	23%
Fuel vs. Energy Cost	$0.58/mile fuel cost, 6.9 MPG	$63,515	$0.23/mile energy cost	$33,091	$(30,424)	(48%)
EV Charger Cost	N/A	$ –	$186k hardware, installation, maintenance	$8,267	$8,267	–
Other Operating Costs	1 tractor, insurance, G&A, CVCs, etc.	$52,808	1.87 tractors, insurance, G&A, CVCs, etc.	$98,574	$45,766	87%
Total	**Annual TCT**	**$291,181**	**Annual TCT**	**$622,438**	**$331,257**	**114%**

* Equipment and maintenance costs are averages

114% TOTAL COST INCREASE

Mixed Fleet Comparison

Ryder applied the TCT for individual vehicles (as outlined previously) to a fleet of 25 commercial vehicles of mixed classes and types in California and Georgia. The mix of the 25 units is a representative sample of the fleet mix in the U.S. today according to Polk Data, which is approximately 43% Class 3-4 (light-duty) vehicles, 17% Class 5-6 (medium-duty) vehicles, and 40% Class 7-8 (heavy-duty) vehicles.

For light- and medium-duty vehicles, the analysis estimates one driver per vehicle for both ICE and EV. For heavy-duty vehicles, as found in the one-to-one comparisons, it is estimated that a company would need nearly two EV tractors and more than two drivers to haul the same load on the same route as one ICE vehicle. In this scenario, a company converting 10 ICE tractors, is estimated to need almost 19 EV tractors and 21 total drivers for the same level of service. This is estimated to increase the number of vehicles from 25 to 34.

Therefore, to convert a mixed fleet of vehicles in California from ICE to EV, the annual TCT is estimated to be nearly $3.4 million or a 56% increase. To convert that same size fleet in Georgia, the TCT is estimated to be more than $3.7 million or a 67% increase.

CALIFORNIA

	ICE TRUCKS			EV TRUCKS			TOTAL COST IMPACT	
TRUCK TYPE	TOTAL ICE UNITS REQURIED	TOTAL DRIVERS REQUIRED	ICE TCT	TOTAL EV UNITS REQUIRED	TOTAL DRIVERS REQUIRED	EV TCT	COST IMPACT	% IMPACT
Transit Van*	11	11	$1,884,560	11	11	$1,938,845	$(54,284)	3
Straight Truck*	4	4	$882,286	4	4	$1,072,459	$(190,173)	22
Tractor**	10	12	$3,341,132	18.7	20.7	$6,487,119	$(3,145,987)	94
Total	**25**	**27**	**$6,107,878**	**33.7**	**35.7**	**$9,498,423**	**$(3,390,545)**	**56**

56% TOTAL COST INCREASE

* Assumes 1 truck and 1 driver for ICE and EV transit van and straight truck
** Assumes 1.2 drivers and 1 tractor for ICE and 2.07 drivers and 1.87 tractors for EV

GEORGIA

	ICE TRUCKS			EV TRUCKS			TOTAL COST IMPACT	
TRUCK TYPE	TOTAL ICE UNITS REQURIED	TOTAL DRIVERS REQUIRED	ICE TCT	TOTAL EV UNITS REQUIRED	TOTAL DRIVERS REQUIRED	EV TCT	COST IMPACT	% IMPACT
Transit Van*	11	11	$1,716,434	11	11	$1,803,643	$(87,208)	5
Straight Truck*	4	4	$775,070	4	4	$988,724	$(213,654)	28
Tractor**	10	12	$2,911,808	18.7	20.7	$6,224,393	$(3,312,585)	114
Total	**25**	**27**	**$5,403,312**	**33.7**	**35.7**	**$9,016,760**	**$(3,613,447)**	**67**

67% TOTAL COST INCREASE

* Assumes 1 truck and 1 driver for ICE and EV transit van and straight truck
** Assumes 1.2 drivers and 1 tractor for ICE and 2.07 drivers and 1.87 tractors for EV

TCT IMPACT ON BUSINESSES AND CONSUMERS

According to the American Trucking Associations, approximately 72% of goods are transported by trucks in the U.S. today. Ryder's analysis estimates cost increases of 94% to 114% to convert heavy-duty trucks to EVs and 56% to 67% to convert mixed fleets of 25 vehicles, depending on the geographic region. If businesses pass the increased cost of transportation onto consumers through higher prices, based on the average cost impact to convert mixed fleets, Ryder estimates that such increased costs could cumulatively add approximately 0.5% to 1% to overall inflation.[2]

INDUSTRY VARIABLES TO CONSIDER

There has been an increased focus on the development of commercial EVs over the past decade. That said, the commercial EV market is still nascent, and there are ongoing challenges such as infrastructure development, battery technology improvements, and cost considerations that continue to hinder adoption.

While this analysis centers on the TCT to convert a fleet in today's landscape, Ryder and the entire industry are considering additional major variables in the adoption of commercial EVs. Two of those variables are EV availability and charging infrastructure.

EV Vehicle Availability

Today, there are 16.4 million Class 3-8 commercial vehicles in operation in the U.S.; of this number only an estimated 18,000 EVs are currently deployed[3]. Additionally, production estimates continue to be volatile in part due to the changing regulatory landscape. Therefore, if companies are required to convert to EVs in the near future, availability and production of EVs may be far less than the vehicles needed to run America's supply chains.

Charging Infrastructure

The Clean Freight Coalition (CFC), an alliance of truck transportation stakeholders, has stated that there is no network in the U.S. where over-the-road professional truck drivers can stop for legally mandated rest breaks and charge a vehicle battery at the same time. According to a report released by the CFC, preparing today's commercial vehicle fleet for electrification would require an investment of nearly $1 trillion in charging infrastructure and electric service upgrades[4].

Additionally, the International Council on Clean Transportation estimates that nearly 700,000 chargers will be needed nationwide to accommodate the one million Class 4, 6, and 8 EVs anticipated to be deployed by 2030, which will consume 140,000 megawatts of electricity every day, equivalent to the daily energy needs of nearly 5 million American homes[5]. Along with these above findings, the Joint Office of Energy and Transportation recently released a zero-emission freight corridor strategy that would not achieve a national charging network in the U.S. until between 2035 and 2040.

[2]Estimated impact on inflation based on Consumer Price Index (CPI) data for all urban consumers from the U.S. Bureau of Labor Statistics assuming transportation costs are 2-4% of certain CPI expenditure categories. See Consumer Price Index data, U.S. Bureau of Labor Statistics (as of February 2024), available at https://www.bls.gov/cpi/. See also F. Curtis Barry & Company, https://www.fcbco.com/articles-and-whitepapers/articles/bid/129441/rising-transportation-costs-and-what-to-do-about-them ("Inbound freight costs for domestically sourced product typically range from 2%-4% of gross sales")., [3]CALSTART report Zeroing in on Zero-Emission Trucks January 2024, [4]CFC Whitepaper: Forecasting a Realistic Electricity Infrastructure Buildout for Medium- & Heavy-Duty Battery Electric Vehicles, [5]The International Council on Clean Transportation – theicct.org

It must be noted, the American Trucking Associations opposes the recently announced EPA emission standard for heavy-duty trucks, saying it's entirely unachievable given the lack of charging infrastructure and restrictions on the power grid.

With more than 80% of U.S. communities relying exclusively on trucking for goods[6], charging infrastructure would need to be in place for the successful conversion of fleets from ICE to EV.

CONCLUSION

Ryder's analysis underscores the reasons EV adoption for commercial vehicles remains in its infancy. In addition to the limited support infrastructure and EV availability, the business case for converting to EV for most payload and mileage applications, is extremely challenging.

While Ryder's analysis estimated the one-to-one conversion to EV for light-duty vehicles to be a relatively modest up to 5% increase in cost – and a good introduction to EV adoption – the one-to-one conversion for medium- and heavy-duty vehicles is estimated to be up to nearly 114% more costly. When expanding the analysis to a mixed fleet, Ryder estimated it can cost 56% more to convert a fleet to EV in California, where fuel and energy costs are typically higher than other states. The cost to convert a fleet is up to 67% more in Georgia, which shows lower fuel and energy costs do not provide the same offsets to the substantially higher EV equipment, operating, and labor costs.

Furthermore, mandating an EV transition at this time may lead to disruptions in our nation's supply chains as well as crippling inflationary pressures on all products moved by trucks. Ryder's analysis shows that if EVs are mandated by law, or encouraged by implementing a tax or fee on ICE vehicles to tilt the economics in favor of EVs, the resulting transportation cost increases could cumulatively add approximately 0.5% to 1% to overall inflation.

Today, Ryder helps customers successfully introduce EVs into their fleets in cases in which the customers' transportation needs align with the technology's current capabilities and available infrastructure. Ryder stands ready to help lead our customers through any energy transition in the commercial transportation industry. However, the technology needed to implement a transition must be available, reliable, and cost competitive with current vehicle technology alternatives.

Now is the time for all stakeholders to come together to examine the big picture. It will take regulators, vehicle manufacturers, technology innovators, and other transportation companies working together to affect real change. This includes a focus on expanding EV payload and range to match ICE vehicles, while keeping the cost of EVs comparable to provide an economic advantage. We must also pursue other alternative fuel technologies—natural gas, hydrogen, hybrids, and carbon capture.

The key to successfully transitioning to a zero-emission future is to find a balance between encouraging innovation and safeguarding the interests of businesses, consumers, and the environment.

[6]ATRI

ABOUT RYDER

Ryder System, Inc. (NYSE: R) is a fully integrated port-to-door logistics and transportation company. It provides supply chain, dedicated transportation, and fleet management solutions, including warehousing and distribution, contract manufacturing and packaging, e-commerce fulfillment, last-mile delivery, managed transportation, professional drivers, freight brokerage, nearshoring solutions, full-service leasing, maintenance, commercial truck rental, and used vehicle sales to some of the world's most-recognized brands. Ryder provides services throughout the United States, Mexico, and Canada. In addition, Ryder manages nearly 250,000 commercial vehicles, services fleets at 760 maintenance locations, and operates nearly 300 warehouses encompassing more than 100 million square feet. Ryder is regularly recognized for its industry-leading practices; technology-driven innovations; corporate responsibility; environmental management; safety, health and security programs; military veteran recruitment initiatives; and the hiring of a diverse workforce. www.ryder.com

Note Regarding Forward-Looking Statements: Certain statements and information included in this news release are "forward-looking statements" within the meaning of the Federal Private Securities Litigation Reform Act of 1995. These forward-looking statements, including our expectations with respect costs of EVs, including related costs of maintenance, charging infrastructure, labor, and insurance, as well as our expectations related to the impact of converting fleets to EVs on supply chains and inflation, are based on our current plans and expectations and are subject to risks, uncertainties and assumptions. Accordingly, these forward-looking statements should be evaluated with consideration given to the many risks and uncertainties that could cause actual results and events to differ materially from those in the forward-looking statements including those risks set forth in our periodic filings with the Securities and Exchange Commission. New risks emerge from time to time. It is not possible for management to predict all such risk factors or to assess the impact of such risks on our business. Accordingly, we undertake no obligation to publicly update or revise any forward-looking statements, whether as a result of new information, future events, or otherwise.

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

Subject: Opposition to the South-Central Specific Plan as Drafted

Dear Ms. Pagoulatos:

Betts Company began the journey from the Bay Area to Fresno between 1990 and 2008. We worked closely on property selection with the City of Fresno Economic Development Department. Today Fresno serves as our corporate headquarters. We have three business units located at 2843 and 2867 South Maple Ave; Betts Spring Manufacturing, Betts Truck Parts and Betts HD. Our company received a benefit package from the City of Fresno where both the City and Betts Company benefit financially, a true win/win. When we came our properties were both in an enterprise and empowerment zone. We benefited greatly from both programs until they were taken away. The city has been a great partner over the years as we proudly call Fresno our home. We employ approximately 350 people in our three business units. A not well-known fact in the manufacturing world is for every manufacturing job there are 3 to 5 more jobs created within the community. The additional jobs are a combination of businesses in the supply chain as well as professional services, the likes of accountancy, legal services, marketing, advertising and more.

My comments today are on behalf of Betts Company and our 350 Team members and their families. Collectively we have great concern on the South-Central Specific Plan and the related Environmental Impact Report as drafted. Our concerns about this report are many.

Betts Company is celebrating its 156th year doing business in California. Making us the oldest family-owned manufacturer in California. To say we have experience doing business in California would be an understatement. We have participated since 2014 in several meetings where the general plan has been on the table for discussion. Frankly, we have witnessed behavior that we feel has been detrimental in bringing the community together. We have witnessed industry being vilified and falsely accused of negatively impacting the community and environment. Many people are not aware that in the Central Valley we have the most stringent air quality requirements anywhere in the world. Manufacturers in the Central Valley are required to employ what is called BACT “Best Available Control Technology”. The San Joaquin Valley Air Quality District overseas this process to ensure the technologies that are employed are the very best in the world. Betts Company has invested millions of dollars in new technologies as we are doing our part to make Fresno air quality the best it can be. Since 2014 the air quality has dramatically improved, and it continues to improve. It is unfortunate the City of Fresno does not share data with the community and certain zero growth groups how much industry and the entire area has improved.

We are shocked and dismayed with many of the mandates the City of Fresno is recommending in the SCSP as presented. Many of the recommendations are overreaching, unfair, likely illegal, and costly. Many from business question where the mandates came from as we do not see other cities in the Central Valley moving in this direction.

Simply put, the City of Fresno does not have the data needed to recommend such mandates. For example, at a recent SCSP community meeting at the Orange Community School, City of Fresno employees when asked what they thought the new diesel NOX levels today are from all class eight truck manufacturers answered somewhere

between 10 and 40% reduced. They were shocked when the industry shared, they are now 98.5% reduced, almost zero. So why enforce mandates forcing business to employ BEV technology when it costs four times that of a 98.5% reduced diesel.

The same lack of knowledge seems to apply to solar. While solar projects have been significant the City of Fresno is again going overboard mandating solar today when the payback ROI has increased from 4 to 5 years to 11 years or more.

Trying to understand the justification by the City of Fresno to downzone or back zone businesses when the SCSP area for over 100 years has been designated Heavy Industrial is shocking and confrontational and unfriendly. Has the City of Fresno forgotten these are businesses that invested here and created the jobs and growth most have benefited from. Also, many are some of our most generous philanthropists and committed civic stewards.

One of greatest concerns remains with the way the City of Fresno has managed the community meetings. The facilitation of the meetings left a lot of businesses and community members frustrated and at odds with one another. The misinformation and lack of factual data was troubling and divisive. The City could have done a better job sharing the true facts and reminding everyone we are one community.

At Betts Company we have many more concerns with the SCSP as drafted. If this plan were to be approved, it would have devastating effects on our businesses and our ability as a community to be competitive and grow. Some of these concerns are as follows:

- Downzoning: The proposed downzoning from Heavy Industrial to Light Industrial and Business Park severely limits the operational capabilities of businesses serving essential sectors like agriculture and construction
- Buffers: The introduction of 1,000-foot buffer zones from “sensitive uses” imposes unfair restrictions on industrial activities, converting many to conditional uses and requiring extensive Health Risk Assessments.
- Mitigation Requirements: The SCSP mandates costly and potentially infeasible requirements, such as solar installations and zero emission equipment which significantly increase operational costs without sufficient justification.

Betts Company is an IS9001 and ISO 14001 certified company. In 2022 we were awarded the coveted Evergreen Certificate through the Tugboat Institute. To earn the Evergreen Certificate your company focusses on proactively implementing new projects to improve the culture and environment. Since 1986 and today we have implemented over 100 projects that have helped improve the environment. We have completed these projects without government intervention and onerous mandates. Industry is aware of so many new technologies and machines that can help leapfrog our businesses to the next level. Every day we are working to improve. Our employees are proud to be part of these efforts.

Betts Company urges the City of Fresno to reconsider the SCSP’s proposed mandates. We recommend a collaborative approach that acknowledges the significant improvements industry has already made. It is crucial to strike a balance between environmental goals and economic sustainability. By working together, we can ensure Fresno remains a thriving industrial hub, attracting and retaining businesses, fostering economic growth, and continuing to improve our community’s quality of life.

We are very fortunate to have agriculture and manufacturing diversity in the Central Valley. We should be doing all we can to help our industries thrive and grow and to want to continue investing in our region.

Thank you for considering our comments.

Sincerely,

Mike Betts
CEO

Dear Honorable Mayor and City Council Members;

On behalf of the Fresno Building Trades Council (representing over 15,000 local working families), we are excited to share the new and forward-looking South Central Specific Plan. The smart focus on the development of employment-generating land use complements other City planning documents to help create a vibrant and balanced strategy for growth over the next two decades.

While we are in support of the Plan, we are concerned the Plan (as currently written) fails to ensure that Fresno residents gain significant workforce-related community benefits. The new Specific Plan will result in several thousand new construction jobs needed to build the projects enabled by it. It would be irresponsible for us not to consider what additional workforce-related community benefits could result from the approval of the Plan.

- Several thousand Fresno residents support their families by working in the construction trades. Will they help build the new Fresno? Will the hundreds of millions in construction wages be reinvested into local businesses where these families shop? Will the City lose millions in sales tax revenue if these wages are spent elsewhere?
- Will these construction wages be sufficient to support working families who live in our community? Conversely, will a "low road" development business plan result in wages well below the median family income?
- Will the potential promise of hundreds of apprentice opportunities be realized so that our region's training programs can accept more Fresno youth and at-risk workers?

To help ensure our community gains the necessary benefits with the passage of the Plan, we are proposing the following modifications to the Plan. We hope to speak with planning staff to confirm that these recommendations are best placed as suggested below:

Chapter 3: Vision, Guiding Principles and Policies

E-1: Coordinate a regional economic development strategy that monitors trends, emerging markets, new technologies and **the region's workforce preparedness programs.**

Chapter 8: Implementation, Job Training and Employment

E-5: Promote job-training programs such as career technical education, adult education, internships, mentoring, and **State of California approved Joint Apprenticeship Training Committee programs.**

E-7: Connect residents to existing training programs and jobs in their neighborhoods. **Support local and/or targeted hiring for construction jobs (including pathways to apprenticeships for local residents) for implementation of the Plan**

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E-10: **Encourage consideration of Project Labor Agreements (PLAs) for private projects that involve City subsidies.**

E-11: **Encourage the use of local workforce and business development sourcing in the plan area to: generate quality construction and service jobs; provide career pathways and job-training opportunities for the local workforce; and pay area standard wages for construction so that expenditures used in the construction of these developments are reinvested into the local economy.**

E-12: **Maximize the City's public financing tools and opportunities for enhancement to fund various economic development initiatives. This could include ensuring sufficient construction workforce community benefits are secured from any sale or lease of publicly-owned land for development purposes.**

We look forward to discussing these proposed changes in the Plan with you. Communities throughout California have placed similar language in the planning documents to promote and sustain a vibrant local economy and grow America's working class.

In Solidarity,

Chuck Riojas
Financial Secretary-Treasurer

California Department of Transportation

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July 29, 2024

City of Fresno
South Central Specific Plan
Draft Environmental Impact Report Notice of Availability
SCH #2019079022
GTS #: https://ld-igr-gts.dot.ca.gov/district/6/report/33065

SENT VIA EMAIL

Mx. Sophia Pagoulatos, Planning Manager
City of Fresno
2600 Fresno St
Fresno, CA 93721
Sophia.pagoulatos@fresno.gov

Dear Mx. Pagoulatos:

Thank you for the opportunity to review the South-Central Specific Plan (SCSP) Draft Environmental Impact Report (DEIR) Caltrans has completed the review of the proposed Plan. This DEIR evaluates the environmental impacts of the proposed SCSP. A key impetus for the proposed SCSP is to improve Fresno's economic competitiveness and support employment opportunities for residents.

The SCSP area (Plan Area), encompasses 5,567 acres located just south and southeast of Downtown Fresno. The Plan Area is generally located south of California Avenue, north of American Avenue, and between Fig and Peach Avenues. The area has a range of property types including residential, religious, educational, public, warehouse, and industrial.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) process reviews land use plans and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

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

1. We concur with the City of Fresno's General Plan's Mobility and Transportation Element, which outlines objectives and policies aimed at achieving goals for the local transportation and circulation system (City of Fresno, 2014). Additionally, we recognize that the policies from the Mobility and Transportation Element are relevant to the proposed SCSP. Specifically, this pertains to Policies MT-1-a through MT-1-J, MT2-1-a through MT-2-M, MT-4-b through MT-4-h, MT-5-a through MT-5-f, MT-6-a through MT-6-m, and MT-8-b through MT-8-c. It is recommended that the city consider a multimodal transportation system (such as bicycle and pedestrian facilities as well as public transportation) to provide connectivity of modes between the residential uses and commercial/retail uses to reduce VMT impacts from the SCSP.
2. We commend the City of Fresno for their proposed SCSP Policies and Development Standards T-1 through T-13, as described on page 4.15-13.0 of the SCSP Draft EIR. These policies and standards aim to establish and enforce truck routes, expand bus services, assist school districts in implementing the 'Safe Route to School' program, conduct traffic calming studies, implement traffic safety measures, and consider funding mechanisms to pre-fund infrastructure improvements prior to development. Additionally, they focus on improving and maintaining sidewalks, which we also support.
3. It is our understanding that the City of Fresno is considering the development of a regional Vehicle Miles Traveled (VMT) bank or VMT exchange program for the Southeast Development Area Specific Plan. We recommend that similar VMT mitigation strategies be explored for the SCSP.
4. Impact 4.15-3: *Substantially Increase Hazards Individual projects must conform to all City design standards and other requirements*, as stated beginning on page 4.15-16 of the SCSP Draft EIR, due to a Geometric Design Feature or Incompatible Uses. The Traffic Planning Section of the City's Traffic Operations and Planning Division will also be reviewing these projects. In addition, Caltrans should be included in the approval process for projects that are located within two miles of a State facility.
5. Alternative transportation policies should be applied to the SCSP. An assessment of multi-modal facilities should be conducted to develop an integrated multi-modal transportation system to serve and help alleviate traffic congestion caused by the project and related development in this area of the city. The assessment should include the following:
    a. Pedestrian walkways should link this Project to transit facilities, bicycle pathways and other walkways in the surrounding area.
    b. Coordinating connections to local and regional bicycle pathways should be done to encourage further the use of bicycles for commuter and recreational purposes.
    c. Transit service and bus stop accommodations should be extended to within ¼-mile of the SCSP site.
6. Check that Active Transportation Plans and Smart Growth efforts support the state's

2050 Climate goals. Caltrans supports reducing VMT and GHG emissions in ways that increase the likelihood people will use and benefit from a multimodal transportation network.

If you have any other questions, please call or email: Keyomi Jones, Transportation Planner at (559) 981-7284 or keyomi.jones@dot.ca.gov.

Sincerely,

Mr. Dave Padilla, Branch Chief,
Office of System and Regional Planning
Transportation Planning – North Branch

Cc: State Clearinghouse

July 24, 2024

Sophia Pagoulatos
Planning Manager
City of Fresno
2600 Fresno Street, Room 3065
Fresno, California 93721
scsp@fresno.gov

Sent via email

Sophia Pagoulatos:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the South Central Specific Plan (Specific Plan) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019079022. The Specific Plan would establish a planning framework to facilitate and guide future development within the 5,567-acre planning area through the year 2040. The Specific Plan area currently supports nearly 19.6 million square feet of industrial development and 400 residential units. It was assumed in the DEIR that an additional 12 million square feet of industrial, retail, and office uses, and 91 dwelling units would be constructed by 2040. The Specific Plan is proposed within the City of Fresno (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB submitted a comment letter, which is attached to this letter, on the Notice of Preparing (NOP) for the DEIR released in April 2021. CARB's comments dated April 23, 2021, highlighted the need for preparing a health risk assessment (HRA) for the Specific Plan and encouraged the City and applicant to implement all existing and emerging zero emission technologies to minimize exposure to diesel particulate matter (diesel PM) and oxides of nitrogen (NOx) emissions for all neighboring communities, and to minimize the greenhouse gases that contribute to climate change. Due to the Specific Plan's proximity to residences already burdened by multiple sources of pollution, CARB's comments expressed concerns with the potential cumulative health risks associated with the construction and operation of the Specific Plan.

CARB is encouraged to see that the City would implement many of the recommended mitigation reduction measures requested in CARB's letter on the NOP for the DEIR released in April 2021. Section 3.6.6 (Development Standards) of the DEIR shows the City would require all on-site motorized operational equipment within the Specific Plan area to be zero-emission, would require 100% of loading dock doors at warehouses used for cold storage to install electric plug-in units to service trucks and trailers with transport refrigeration units (TRU) and would require all TRUs to plug-in while within the Specific Plan

area.[1] The Specific Plan also includes Mitigation Measures 4.3-1h and 4.3-1i, which would require vans/trucks and heavy-duty trucks to be zero emission by 2026 and 2031, respectively.

However, CARB remains concerned that the construction and operation described in the Specific Plan will expose nearby residential communities to elevated levels of air pollution beyond the existing baseline emissions.

Residences are located adjacent to and within the proposed Specific Plan area. As described in the DEIR, the existing 400 residences within the Specific Plan area are already exposed to diesel PM emissions from the 19.6 million square feet of industrial land uses currently in operation within the Specific Plan area, vehicular traffic along State Route 99 and State Route 41, and rail traffic along existing rail lines. These residences within and around the Specific Plan area are within the South Central Fresno Community which has been designated as a disadvantaged community under Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017).[2] AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. CARB has selected the South Central Fresno Community, which encompasses the Project area, as a community that, due to its high pollution burden, requires the development of a community emissions reduction program (CERP), to significantly reduce emissions within the community. Therefore, it is imperative that the City ensure that its land use decisions, including its decision on this Project, are consistent with the South Central Fresno Community CERP, in its entirety.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)); In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 4% for Pollution Burden and is considered a

[1] City of Fresno. Fresno Central Specific Plan Draft Environmental Impact Report. Page 4-32 through 4-33. Accessible at *https://files.ceqanet.opr.ca.gov/252896-7/attachment/rOpLXb209Ofk3eZe4wDFg7wHQDVSv6wq019ZVSHYYW7VgHSIL_TwoeWyyadgeWrmCOwpSZq5Z-w-IYpd0*

[2] Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.

disadvantaged community. The City must ensure that the Project does not adversely impact neighboring disadvantaged communities.

The City Must Fully Evaluate the Project's Health Risk Impacts

The DEIR did not include an HRA for the Specific Plan "[b]ecause no specific developments are proposed and no site-specific construction and operational information is available, and because of the programmatic nature of analyses for a large-scale plan..."[3] Consequently, the City evaluated the Specific Plan's health risk impacts qualitatively. Based on this qualitative analysis, the City concluded that the construction and operation of the Specific Plan would expose nearby residences to diesel PM emissions that would result in a significant impact. To mitigate this impact, the City included mitigation measures MM 4.3-3a and MM 4.3-3b, which would require the preparing of a construction and operational HRA for each proposed industrial development within the Specific Plan area located within 1,000 feet of a sensitive receptor.[4] Even after the implantation of these mitigation measures, the City concluded in the DEIR that the construction and operation of the Specific Plan would result in a significant and unavoidable health risk impact.

To fully understand the Project's health risk impacts, mitigation measures MM 4.3-3a and MM 4.3-3b must be modified to require all proposed industrial development within the Specific Plan area to prepare their own individual HRA; the City must also ensure the combined construction and operation of all industrial developments within the Specific Plan area does not expose any existing or future proposed residences to a health risk that exceeds the San Juaquin Valley Air Pollution Control District's (SJVAPCD) 20 in a million cancer risk significance threshold. Some of the proposed industrial development could be located well beyond the specified 1,000-foot distances required to prepare an HRA. The combined operation of heavy-duty trucks, onsite equipment, and other industrial emissions sources at each of the proposed industrial developments within the Specific Plan area would very likely expose residences within the South Central Fresno Community to cancer risks that would exceed the SJVAPCD's health risk significance threshold. To mitigate this impact, the City must track the potential health risk impacts as the proposed industrial development is built out. The City must require additional mitigation measures to be implemented if existing or future residences within or outside of the Specific Plan are exposed to diesel PM emissions above the SJVAPCD's health risk significance threshold.

[3] City of Fresno. Fresno Central Specific Plan Draft Environmental Impact Report. Page 4.3-17. Accessible at *https://files.ceqanet.opr.ca.gov/252896-7/attachment/rOpLXb209Ofk3eZe4wDFg7wHQDVSv6wq019ZVSHYYW7VgHSIL_TwoeWyyadgeWrmCOwpSZq5Z-w-IYpd0*

[4] City of Fresno. Fresno Central Specific Plan Draft Environmental Impact Report. Page 4.3-31. Accessible at *https://files.ceqanet.opr.ca.gov/252896-7/attachment/rOpLXb209Ofk3eZe4wDFg7wHQDVSv6wq019ZVSHYYW7VgHSIL_TwoeWyyadgeWrmCOwpSZq5Z-w-IYpd0*

The City Must Evaluate the Specific Plan's Combined Air Quality Impacts

The City concluded in Section 4.3 (Air Quality) of the DEIR that the construction and operation of the Specific Plan would result in a significant impact on air quality. To reduce these impacts, the City includes 13 mitigation measures, including Mitigation Measure 4.3-1a, which would require the preparation of an Ambient Air Quality Analysis (AAQA) for all individual industrial projects within the Specific Plan area.[5] The AAQA would be submitted to the Director of the Fresno Planning and Development Department, or designee for approval. The AAQA would evaluate whether each project within the Specific Plan area, requiring discretionary approval, would exceed the SJVAPCD's CEQA significance thresholds or violate the Ambient Air Quality Standards. "If one or more thresholds are exceeded, prior to the issuance of Certificates of Occupancy, future development will engage in a voluntary emissions reduction agreement (VERA) through coordination with SJVAPCD to reduce emissions to meet SJVAPCD's annual mass emissions thresholds for any pollutant that exceeds the respective threshold."[6] After the implementation of the mitigation measures listed in the DEIR, the City concludes that the Specific Plan's impact on air quality would be reduced to a less than significant level.

The City does not provide substantial evidence showing how Mitigation Measure 4.3-1a and other mitigation measures listed in the DEIR would reduce the Specific Plan's construction and operational air pollutant emission rates to below the SJVAPCD's significance thresholds. Although the City provides unmitigated air pollutant emission rates in the DEIR showing the Specific Plan would impact air quality, it does not provide mitigated air pollutant emission rates showing how this impact would be reduced to a less than significant level. Implementation of Mitigation Measure 4.3-1a would ensure that each individual project within the Specific Plan area would be reduced to below the SJVAPCD's significance thresholds; however, it is unclear how this mitigation measure would ensure that the cumulative air pollutant emissions from all industrial projects within the Specific Plan area would be reduced to below the SJVAPCD's significance thresholds substantiating the less than significant impact after mitigation conclusion in the DEIR. To ensure that the Specific Plan's air quality impacts would be reduced to a less than significant level after mitigation, Mitigation Measure 4.3-1a should be modified to require the City to track the combined air pollutant emissions emitted by the proposed industrial developments as the

[5] City of Fresno. Fresno Central Specific Plan Draft Environmental Impact Report. Page 4.2-20. Accessible at *https://files.ceqanet.opr.ca.gov/252896-7/attachment/rOpLXb209Ofk3eZe4wDFg7wHQDVSv6wq019ZVSHYYW7VgHSIL_TwoeWyyadgeWrmCOwpSZq5Z-w-IYpd0*

[6] City of Fresno. Fresno Central Specific Plan Draft Environmental Impact Report. Page 4.3-20. Accessible at *https://files.ceqanet.opr.ca.gov/252896-7/attachment/rOpLXb209Ofk3eZe4wDFg7wHQDVSv6wq019ZVSHYYW7VgHSIL_TwoeWyyadgeWrmCOwpSZq5Z-w-IYpd0*

Specific Plan is built out in the year 2040. If the combined air pollution rates of all industrial developments proposed in the Specific Plan exceed the SJVAPCD's significance threshold after all mitigation is applied, addition mitigation measures should be implemented to reduce the air quality impact.

The DEIR May Have Used Inappropriate Trip Lengths When Modeling the Specific Plan's Air Quality Impacts from Mobile Sources

The City may have underestimated mobile source air pollutant emissions in the DEIR by relying on unrealistic truck trip lengths. The Project's operational air pollutant emissions are presented in Section 4.3 (Air Quality) of the DEIR and modeled in Appendix B (Air Quality, Energy, and Greenhouse Gases Emissions Modeling Data). Based on CARB's review of the Project's air quality analysis, the Project's mobile air quality impacts were modeled assuming trucks would travel a distance of 40 miles.[7] The City does not provide any substantial evidence in the DEIR explaining why this would be a representative trip distance. Since trucks serving the Project may originate from the Ports of Stockton or other regions approximately 130 miles from the Project site, CARB urges the City to use Project-specific truck trip distances in their air quality impact analysis. Unless the City re-evaluates or provides substantiation for the designated truck trip lengths, the Project should include a mitigation measure or project design feature that restricts trucks from traveling a distance greater than what was analyzed in the DEIR.

Conclusion

CARB is concerned about the Specific Plan's air quality and public health impacts. CARB urges the City to modify MM 4.3-3a and MM 4.3-3b to require the preparation of an HRA for each of the industrial developments proposed within the Specific Plan area and ensure the combined construction and operation of all industrial developments within the Specific Plan area does not expose any existing or future proposed residences to a health risk that exceeds the SJVAPCD's significance threshold. To ensure that the Specific Plan's air quality impacts would be reduced to a less than significant level after mitigation, as concluded in the DEIR, Mitigation Measure 4.3-1a should be modified to require the City to track the combined air pollutant emissions as the Specific Plan is built out in the year 2040, and ensure air pollutant emissions do not exceed the SJVAPCD's significance thresholds. Lastly, the City must evaluate the Project's mobile air quality impacts using trip distances supported by substantial evidence.

[7] City of Fresno. Fresno Central Specific Plan Draft Environmental Impact Report. Appendix B. Accessible at *https://files.ceqanet.opr.ca.gov/252896-7/attachment/LYZTBtoo7l-0ssk8usW36TN6-i2AvbU2w6WDSa26PODNT3s-17vo4mcCkq3bqbt2RUtDyPLZem_QHEI00*

CARB appreciates the opportunity to comment on the DEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*.

Sincerely,

Matthew O'Donnell, Chief, Risk Reduction Branch

Attachment

cc: State Clearinghouse
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Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

April 23, 2021

Jennifer Clark, Planning Director
c/o Cherie Vick, Executive Assistant
Planning and Development Department
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Cherie.vick@fresno.gov

Dear Jennifer Clark:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the South Central Specific Plan Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019079022. The Project would establish a planning framework to facilitate and guide future development within the 4,997-acre planning area through the year 2040. The Project is located in the City of Fresno (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Consistent with CARB's letter in response to the first NOP for this Project, dated January 14, 2020, CARB is again providing comments urging the City to address potential air quality impacts and associated public health effects related to the construction and operation of the Project.[1] The Project would result in the development of light and heavy industrial land uses that will result in higher daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts, yard tractors, and transport refrigeration units). This increase in activity will negatively impact local air quality with health-harming emissions, including particulate matter, diesel particulate matter (diesel PM), and other toxic air contaminants, generated during the construction and operation of the Project. These air pollutant emissions also contribute to regional air pollution by emitting precursors that lead to the formation of secondary air pollutants, like ozone, and contribute to an increase in greenhouse gas (GHG) emissions.[2]

Notably, as clearly laid out in the California Attorney General's letter in response to the City's NOP for the first iteration of this project, entitled the South Industrial Priority Area (SIPA) Specific Plan, the Project area sits squarely in and adjacent to several communities already suffering from the highest pollution burdens in Fresno and the State.[3] Indeed, as explained

1 California Air Resources Board. Letter to the City of Fresno. January 14, 2020. Comments on the Notice of Preparation for the South Stockton Commerce Center Project Draft Environmental Report. Accessible at *https://ww2.arb.ca.gov/sites/default/files/classic//toxics/ttdceqalist/southstocktoncommercecenternop.pdf*

2. With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

3 State of California Department of Justice. Letter to the City of Fresno. August 2, 20219. Accessible at: *https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/comments-fresno-south-industrial-priority-area-specific-plan-08-02-2019.pdf*.

below, CARB has selected South Central Fresno Community, which encompasses the Project area[4], as a community that, due to its high pollution burden, requires the development of a community emissions reduction program (CERP), to significantly reduce emissions within the community. Therefore, it is imperative that the City ensure that its land use decisions, including its decision on this Project, are consistent with the South Central Fresno Community CERP, in its entirety.

The Industrial Uses Will Increase Exposure to Air Pollution in Disadvantaged Communities

The proposed heavy and light industrial land uses will undoubtedly expose the nearby disadvantaged communities to increased levels of air pollution. Addressing the disproportionate impacts that air pollution has on disadvantaged communities is a pressing concern across the State, as evidenced by statutory requirements compelling California's public agencies to target these communities for clean air investment, pollution mitigation, and environmental regulation. The following three pieces of legislation need to be considered and included in the DEIR when developing a project like this in a disadvantaged community:

Senate Bill 535 (De León, 2012)

Senate Bill 535 (De León, Chapter 830, 2012)[5] recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality and requires funds to be spent to benefit disadvantaged communities. The California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen).[6] This Project falls within the boundary of the South Central Fresno Community. The maximum CalEnviroScreen score for the South Central Fresno Community is in the top 1 percent, indicating that the area is home to some of the most vulnerable neighborhoods in the State. The air pollution levels in the South Central Fresno Community routinely exceed State and federal air quality standards. CARB urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

4 San Joaquin Valley Air Pollution Control District. AB 617 Fresno Community Boundary. Accessible at: *https://sjvapcd.maps.arcgis.com/apps/webappviewer/index.html?id=8ec36b5d4f61474094aacd37ad4f0f95*.

5. Senate Bill 535, De León, K., Chapter 800, Statutes of 2012, modified the California Health and Safety Code, adding § 39711, § 39713, § 39715, § 39721and § 39723.

6. "CalEnviroScreen 3.0." Oehha.ca.gov, California Office of Environmental Health Hazard Assessment, June 2018, *https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30*.

Senate Bill 1000 (Leyva, 2016)

Senate Bill 1000 (SB 1000) (Leyva, Chapter 587, Statutes of 2016)[7] amended California's Planning and Zoning Law. SB 1000 requires local governments that have identified disadvantaged communities to incorporate the addition of an environmental justice element into their general plans upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities.

Assembly Bill 617 (Garcia, 2017)

The State of California has emphasized protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017).[8] AB 617 requires CARB to direct the process that creates new community-focused and community-driven action to reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants. In response to AB 617, CARB established the Community Air Protection Program with the goal of reducing exposure in communities heavily impacted by air pollution. As part of its role in implementing AB 617, CARB must annually consider the selection of communities for development and implementation of community air monitoring plans and/or community emission reduction programs for those communities affected by a high cumulative exposure burden. The South Central Fresno Community is one of 15 communities statewide chosen thus far for inclusion in the Community Air Protection Program.

The South Central Fresno Community was selected for both community air monitoring and the development of a CERP due to its high cumulative exposure burden, the presence of a significant number of sensitive populations (children, elderly, and individuals with pre-existing conditions), and the socioeconomic challenges experienced by its residents. On February 13, 2020, CARB approved the community's CERP, making it a legally enforceable emission reduction program. The CERP included several strategies to achieve emission reductions throughout this community, including significantly reducing or eliminating emissions from heavy-duty mobile sources and industrial stationary sources.[9]

Health-harming emissions, including particulate matter (PM), toxic air contaminants, and diesel PM generated from the proposed increase in heavy and light industrial development in the Project area will negatively impact the community, which is already disproportionally

7. Senate Bill 1000, Leyva, S., Chapter 587, Statutes of 2016, amended the California Health and Safety Code, § 65302.
8. Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.
9 San Joaquin Valley Air Pollution Control District. AB 617 Fresno Community Boundary. Accessible at: *https://sjvapcd.maps.arcgis.com/apps/webappviewer/index.html?id=8ec36b5d4f61474094aacd37ad4f0f95*.

impacted by air pollution from existing freight operations as well as stationary sources of air pollution. Part of the AB 617 process required CARB and the San Joaquin Valley Air Pollution Control District (SJVAPCD) to create a highly-resolved inventory of air pollution sources within this community. CARB would be happy to share and discuss this community emissions inventory with the City to aid in the DEIR's cumulative impact analysis.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Operation

Since the light and heavy industrial land uses proposed under the Project are near residential communities that are already burdened by multiple air pollution sources, CARB urges the City to prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy-duty trucks. The City has approved, in a piecemealed manner, over 5 million square feet of industrial warehouse space along East Central Avenue over the past few years without adequately addressing air quality impacts from the approved projects. Going forward, the City must prepare the HRA that accounts for operation of the full buildout of the Project before it can consider approving the Project. Given the past approvals of industrial warehouses and other industrial uses, the HRA should also determine if the operation of the Project in conjunction with the operation of past, present, and reasonably foreseeable future projects or activities would result in a cumulative cancer risk impact on nearby residences. To reduce diesel PM exposure and associated cancer risks, CARB urges the City to include all the air pollution reduction measures listed in Attachment A of this comment letter in the HRA and DEIR.

The project description in the NOP does not state whether the industrial uses proposed under the Project would include cold storage warehouses. Project descriptions "must include (a) the precise location and boundaries of the proposed project, (b) a statement of the objectives sought by the proposed project, (c) a general description of the project's technical, economic and environmental characteristics, and (d) a statement briefly describing the intended use of the EIR." (stopthemilleniumhollywood.com v. City of Los Angeles (2019) 39 Cal.App.5th 1, 16.) "This description of the project is an indispensable element of both a valid draft EIR and final EIR." (Ibid.) Given this mandate to include a complete project description, CARB urges the City to prepare an EIR that addresses the impacts from the full buildout of the Project area.

Since the Project description provided in the NOP does not explicitly state that the proposed industrial land uses would not be used for cold storage, there is a possibility that trucks and trailers visiting the Project-site would be equipped with transport refrigeration units (TRU).[10] TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project-site. Residences and other sensitive receptors (e.g., daycare facilities, senior care

10. TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel exhaust emissions that would result in a significant cancer risk impact to the nearby community. If the industrial land uses proposed under the Project would be used for cold storage, CARB urges the City to model air pollutant emissions from on-site TRUs in the DEIR, as well as include potential cancer risks from on-site TRUs in the Project's HRA. If the Project will not be used for cold storage, CARB urges the City to include one of the following design measures in the DEIR:

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project-site; or

- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),[11] and CARB's Hot Spots Analysis and Reporting Program (HARP2 model). The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2021 Emission Factors model (EMFAC2021). Mobile emission factors can be easily obtained by running the EMFAC2021 Web Database: https://arb.ca.gov/emfac/.

The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and planners will have a complete understanding of the potential health impacts that would result from the Project.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Construction

In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should also be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment. The OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction of the Project would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project-site during construction.

11. Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: *https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf*.

The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. As previously stated in Section II of this letter, the cancer risks evaluated in the construction HRA should be based on the latest OEHHA guidance and CARB's HARP2 model. The cancer risks reported in the HRA should be calculated using the latest emission factors obtained from CARB's latest EMFAC (currently EMFAC 2021) and Off-road models.

Conclusion

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and NO_x emissions, as well as the GHGs that contribute to climate change. CARB encourages the City to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*.

Sincerely,

Deldi Reyes

Deldi Reyes, Director, Office of Community Air Protection

Attachment

cc: See next page.

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Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

ATTACHMENT A

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

The California Air Resources Board (CARB) recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommended by CARB, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved equal to or exceed that of a Tier 4 engine.

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO_x) standard starting in the year 2022.[1]

1. In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NO_x emission standard is available at: *https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards*.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.[2]

3. Include contractual language in tenant lease agreements that requires all TRUs entering the project-site be plug-in capable.

4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the project site be zero-emission.

6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.
8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks

2. CARB's technology assessment for transport refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: *https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf*.

including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[3] Periodic Smoke Inspection Program (PSIP),[4] and the Statewide Truck and Bus Regulation.[5]

9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.

10. Include contractual language in tenant lease agreements that limits on-site TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted, and the health impacts fully mitigated.

11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

12. Including language in tenant lease agreements, requiring the installing of vegetative walls[6] or other effective barriers that separate loading docks and people living or working nearby.

3. In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: *https://ww2.arb.ca.gov/our-work/programs/ttghg*.

4. The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: *https://www.arb.ca.gov/enf/hdvip/hdvip.htm*.

5. The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: *https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm*.

6. Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: *https://ww2.arb.ca.gov/sites/default/files/classic//research/apr/past/13-306.pdf*.

July 7, 2024

Sent via email

Jennifer Clark
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Re: Fresno South Central Specific Plan Draft Environmental Impact Report SCH #2019079022

Dear Ms. Clark:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Fresno South Central Specific Plan SCH #2019079022 ("Project"). The Center has reviewed the Draft Environmental Impact Report ("DEIR") closely and is deeply concerned about the myriad serious inadequacies in the environmental review.

This letter focuses on the deficient greenhouse gas analysis, which ignores serious sources of greenhouse gas emissions, does not support its conclusions with substantial evidence, and fails to adopt feasible mitigation measures that are common for industrial projects. The City's plan to site hundreds of acres of heavy industrial land uses in a community that faces some of the worst environmental burdens in the state is a grave environmental injustice. Doing so without disclosing or mitigating the attendant harms is a violation of CEQA. The Center urges the City to recirculate a legally compliant EIR.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 68,000 thousand members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Fresno County.

I. THE EIR'S GREENHOUSE GAS ANALYSIS FAILS TO DISCLOSE, ANALYZE, OR MITIGATE SIGNIFICANT IMPACTS.

A. Climate Change Is a Catastrophic and Pressing Threat to California.

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and that climate change threats are becoming increasingly dangerous. The Intergovernmental Panel on Climate Change (IPCC), the leading international scientific body for the assessment of climate change, concluded in its 2014 Fifth Assessment Report that: "[w]arming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, and sea level has risen," and further that "[r]ecent climate changes have had widespread impacts on human and natural systems." (IPCC 2014.) These findings were echoed in the United States' own 2014 Third National Climate Assessment and 2017 Climate Science Special Report, prepared by scientific experts and reviewed by the National Academy of Sciences and multiple federal agencies. The Third National Climate Assessment concluded that "[m]ultiple lines of independent evidence confirm that human activities are the primary cause of the global warming of the past 50 years" and "[i]impacts related to climate change are already evident in many regions and are expected to become increasingly disruptive across the nation throughout this century and beyond." (Melillo 2014.) The 2017 Climate Science Special Report similarly concluded:

> [B]ased on extensive evidence, it is extremely likely that human activities, especially emissions of greenhouse gases, are the dominant cause of the observed warming since the mid-20th century. For the warming over the last century, there is no convincing alternative explanation supported by the extent of the observational evidence.

The U.S. National Research Council concluded that "[c]limate change is occurring, is caused largely by human activities, and poses significant risks for—and in many cases is already affecting—a broad range of human and natural systems." (NRC 2010.) Based on observed and expected harms from climate change, in 2009 the U.S. Environmental Protection Agency found that greenhouse gas pollution endangers the health and welfare of current and future generations. (74 Fed. Reg. 66496 (Dec. 15, 2009) [U.S. EPA, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act; Final Rule].)

These authoritative climate assessments decisively recognize the dominant role of greenhouse gases in driving climate change. As stated by the Third National Climate Assessment: "observations unequivocally show that climate is changing and that the warming of the past 50 years is primarily due to human-induced emissions of heat-trapping gases." (Mellilo 2014.) The Assessment makes clear that "reduc[ing] the risks of some of the worst impacts of climate change" will require "aggressive and sustained greenhouse gas emission reductions" over the course of this century. (Melillo 2014 at 13, 14, and 649.)

The impacts of climate change are already being felt by humans and wildlife. Human-induced climate change, including more frequent and intense extreme events, has caused widespread adverse impacts and related losses and damages to nature and people. (IPCC 2022.) This rise in weather and climate extremes has led to some irreversible impacts, as natural and human systems are pushed beyond their ability to adapt. (IPCC 2022.) Climate change is

increasing stress on species and ecosystems—causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes—in addition to increasing species extinction risk. (Warren 2008.) Climate-change-related local extinctions are already widespread and have occurred in hundreds of species. (Wiens 2016.) Catastrophic levels of species extinctions are projected during this century if climate change continues unabated. (Thomas 2004; Maclean 2011; Urban 2015.) In California, climate change will transform our climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability.

The United States has contributed more to climate change than any other country. The U.S. is the world's biggest cumulative emitter of greenhouse gas pollution, responsible for 27 percent of cumulative global CO2 emissions since 1850, and the U.S. is currently the world's second highest emitter on an annual and per capita basis. (World Resources Institute 2020.) Nonetheless, U.S. climate policy is wholly inadequate to meet the international climate target to hold global average temperature rise to well below 2°C above pre-industrial levels to avoid the worst dangers of climate change. Current U.S. climate policy has been ranked as "insufficient" by an international team of climate policy experts and climate scientists which concluded that "the US' climate policies and action in 2030 need substantial improvements." (Climate Action Tracker 2022.)

The IPCC's most recent report, entitled Climate Change 2022: Impacts, Adaptation and Vulnerability, found that warming is proceeding even faster than anticipated, and the best-case scenario for climate change is slipping out of reach. (IPCC 2022.) The report now estimates that, over the next 20 years, the world will cross the global warming threshold of 1.5°C. And unless there are immediate, rapid and large-scale reductions in greenhouse gas emissions, limiting warming to close to 1.5°C—or even 2°C—will be beyond reach. The United Nations Secretary General described the forecasts in this report as an "atlas of human suffering." (Borenstein 2022.)

In response to inadequate action on the national level, California has taken steps through legislation and regulation to fight climate change and reduce statewide GHG emissions. Enforcement and compliance with these steps are essential to help stabilize the climate and avoid catastrophic impacts to our environment. California has a mandate under AB 32 to reach 1990 levels of GHG emissions by the year 2020, equivalent to approximately a 15 percent reduction from a business-as-usual projection. (Health & Saf. Code, § 38550.) Based on the warning of the Intergovernmental panel on Climate Change and leading climate scientists, Governor Brown issued an executive order in April 2015 requiring GHG emission reduction 40 percent below 1990 levels by 2030. (Executive Order B-30-15 (2015).) The Executive Order is line with a previous Executive Order mandating the state reduce emission levels to 80 percent below 1990 levels by 2050 in order to minimize significant climate change impacts. (Executive Order S-3-05 (2005).) In enacting SB 375, the state has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.

The state Legislature has found that failure to achieve greenhouse gas reduction would be "detrimental" to the state's economy. (Health & Saf. Code § 38501(b).) In his 2015 Inaugural

Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- Increase electricity derived from renewable sources to 50 percent;
- Reduce today's petroleum use in cars and trucks by 50 percent;
- Double the efficiency of existing buildings and make heating fuels cleaner.

(Brown 2015 Address.)

Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.* (9th Cir. 2008) 538 F.3d 1172, 1217 ("the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct).) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emission disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate.

Given the increasingly urgent need for drastic action to reduce GHG emissions, the EIR's failure to fully disclose, analyze, mitigate, or consider alternatives to reduce the Project's significant climate change effects is all the more alarming.

B. The EIR's Greenhouse Gas Analysis Uses a Threshold of Significance that Is Not Supported By Substantial Evidence and Does Not Capture Significant Impacts.

A lead agency's selection of a threshold of significance must be supported with substantial evidence. Moreover, a determination that an environmental impact complies with a particular threshold of significance does not relieve a lead agency of its obligation to consider evidence that indicates the impact may be significant despite compliance with the threshold. (CEQA Guidelines § 15064(b)(2).) If evidence shows that an environmental impact might be significant despite the significance standard used in the EIR, the agency must address that evidence. (*Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1111.)

The City here fails its responsibility to use a threshold of significance that captures all significant impacts. The EIR claims to use a threshold taken from the 2022 Scoping Plan Appendix D—a document that states that "it focuses primarily on climate action plans and local authority over new residential development. It does not address other land use types (e.g., industrial)." (CARB Appendix D at 4.). The appendix makes clear that the three attributes the EIR uses as the threshold of significance "address the largest sources of operational emissions *for residential projects*." (CARB at 23, emphasis added.) and that the approach to determining the significance of GHG impacts "is only intended for residential and mixed-use development projects." (CARB at 24.)[1] The EIR itself admits that "these project attributes were developed for

[1] A mixed-use development project is one that includes both residential and nonresidential uses with at least two third of the square footage designated for residential use. (CARB at 21, citing Cal. Gov. Code., tit. 7, section

residential and residential mixed-use project types only, which are not emphasized in the proposed plan." (DEIR at 4.8-14.)

The environmental impacts of industrial development are substantial, carry serious environmental justice consequences, and come from very different sources than the impacts of residential development. For one example, truck trips to transport goods are usually the greatest source of GHG emissions from a warehouse project—and, indeed, mobile sources will cause more than half of this project's emissions. (DEIR at 4.8-13.) Warehouses are well-known for these truck trips, which have earned the neighborhoods near warehouses the nickname "diesel death zones." Residential development does not generate heavy-duty truck traffic. Industrial development also generates GHGs from heavy-duty equipment like forklifts and pallet jacks, from industrial refrigeration of massive warehouse buildings, from diesel-powered generators—none of which are common in homes. Attempting to evaluate industrial development using a threshold of significance developed for residential projects forecloses consideration of the very things that make industrial development harmful and is therefore illegal under CEQA.

C. The EIR's Consideration of VMT Is Not Supported by Substantial Evidence.

The EIR's VMT analysis is riddled with errors. First, the EIR is not consistent about what the threshold of significance for VMT reduction is. The EIR claims to be using a "qualitative approach" whereby projects that include the "key attributes" that reduce GHGs from residential projects, taken from Appendix D of the 2022 Scoping Plan, will not have significant GHG impacts. (DEIR at 4.8-14-15.) However, the EIR then does not analyze whether the project includes those attributes. (It does not.) Instead, the EIR makes a number of unclear, unsupported assertions, including that the plan will "reduce the distance between destinations," that are not connected to any threshold of significance. (DEIR at 4.8-15.) It then concludes that the VMT is not significant without explaining what yardstick was used to make this determination. (DEIR at 4.8-14.) Under CEQA, an EIR must establish a threshold of significance, support that threshold with substantial evidence, and then evaluate the impact against the threshold. This muddled analysis does not comply.

Second, the EIR incorrectly states that the proposed plan "would result in a 33% decrease in VMT." (DEIR at 4.8-16.) This statement is not supported by explanation or citation in the body of the EIR. The Transportation Impact Analysis appendix says that "the project is expected to *increase* the total VMT in the area" by over a million miles. (DEIR Transportation Impact Analysis at 3, emphasis added, 41.) In claiming a decrease, the EIR seems to be referring to the fact that because the plan is expected to increase employment, VMT will decrease "per service population." For one thing, the California Supreme Court has repeatedly cautioned that readers should not be forced to sift through appendixes to detect the EIR's environmental analysis. (*Cleveland Nat. Forest Found. v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 516; *Cal. Oak Found. v. City of Santa Clarita* (2005) 133 Cal.App.4th 1219, 1239 ["[I]nformation scattered here and there in EIR appendices, or a report buried in an appendix, is not a substitute for good faith reasoned analysis."], internal quotations omitted.) Here, a reader must turn to the

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65589.5(h)(2)(B)). In this Project, 270 acres would be designated for residential uses, and 5,297 acres for non residential uses. (DEIR at 3-14.) It is not a mixed-use development.

appendix to understand that VMT will go up, not down. Moreover, when a project causes economic or population growth, the EIR must analyze the environmental impacts of that growth. Pub Res C §21100(b)(5); 14 Cal Code Regs §15126(d), §15126.2(e); *Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors* (2001) 91 CA 4th 342, 368. That means that if VMT will increase as the service population increases, the increased VMT is an environmental impact that the EIR must consider.

Third, the EIR's VMT estimate ignores the most significant source of VMTs—the generation of heavy-duty truck trips to bring goods to and from warehouses. The EIR estimates trip generation from industrial land uses using the rate for trips generated by employees, not the rate for truck trips used in warehouse operations. (DEIR Transportation Impact Analysis at 3, emphasis added, 41.) This means that the estimate includes the relatively minor impact of employee commutes, but ignores the impact of heavy-duty diesel trucks that drive many times further, go to and from the warehouse much more frequently, and produce vastly higher emissions per mile. The EIR's choice to omit analysis of the greenhouse gas impacts of heavy trucks is inexcusable. Substantial evidence demonstrates that the Project will generate hundreds of truck trips each day. The EIR acknowledges that truck trips to transport goods will be a main source of GHG emissions from the Project, and over half of the Project's GHG emissions will come from mobile sources. (DEIR at 4.8-13.) However, the EIR maintains that these truck trips, no matter their possible number, cannot possibly cause significant GHG impacts. By not estimating or disclosing how many heavy-duty truck trips the project will generate, the EIR fails inform the public about the real magnitude of the environmental impacts.

D. The EIR's Mitigation Measures for Greenhouse Gas Impacts Are Inadequate.

The EIR acknowledges that the Project will have significant greenhouse gas impacts, but adopts weak, vague mitigation measures that fall far short of best-practices. The City has the obligation to adopt all feasible mitigation to reduce the Project's significant GHG impacts, such as the basic mitigation measures that have become standard for new warehouse development. Examples of such measures include those listed in the Fontana Ordinance No. 1891, which were specifically formulated to mitigate impacts from warehouse development and protect residents and the air basin from cumulative environmental impacts. (City of Fontana 2022.) The California Office of the Attorney General also has published a document entitled "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" to help lead agencies comply with these requirements. (AGO 2021.) Nearly all of the example mitigation measures in this document have been adopted in a warehouse project in California, demonstrating their feasibility.

Idling times

The EIR adopts a so-called mitigation measure that allows trucks to idle for up to five minutes—more than twice as long as the California Attorney General's recommendation of a two-minute limit. (DEIR at 4.3-22, AGO 2021.) Further, a five-minute idling restriction is required by the California Airborne Toxics Control Measure. Therefore, it is not truly mitigation measure, it is a promise to follow the law. As the California Attorney General notes, compliance

with regulations is a baseline expectation and should not be labeled a mitigation measure. (AGO 2021.) Again the EIR replaces a recommended, feasible mitigation measure with a much weaker substitute that does not properly mitigate a significant impact. The Project must revise mitigation measure 4.3-1f to require idling times to be kept under two minutes.

VOC Emissions

The EIR's mitigation measure 4.3f allows "low-VOC coatings," which means fewer than 50 g/liter. (DEIR at 4.3-22.) That level is five times higher than the California Attorney General's recommendation of a 10 g/L limit. (AGO 2021.) By falling so far short of the Attorney General's best practices, the EIR fails to properly mitigate a significant impact. The Project must revise mitigation measure 4.3f to require the use of low-VOC products with less than 10 g/L.

Natural Gas

As the EIR acknowledges, stopping the use of natural gas is critical for the transition to clean energy. (DEIR at 4.8-15.) However, the EIR incorrectly claims that it will comply with this mandate through the use of renewable biogas. (DEIR at 4.8-17.) Biogas is a false solution that creates dangerous leaks of methane—a greenhouse gas that is over 80 times more potent than CO2. (Bakkaloglu et al., 2022; Gallucci, 2023.) Methane is also an air pollutant that causes serious health problems. (Climate & Clean Air Colaition.) This Project cannot evade its responsibility to replace natural gas with clean energy through the counterproductive use of biogas or biomethane.

100% Rooftop Solar

The technology exists now to require all future building sites to install enough rooftop solar photovoltaic panels to meet 100% of projected energy needs or be built with the capacity for these panels to be added later. In order to meet its decarbonization targets, California needs to double its clean energy generation in the next decade, which will require a "record-breaking" expansion of clean energy infrastructure. (Cart, California Energy Commission). The Joint Agency SB 100 Report calls for building 2.8 GW/year of solar every year for 25 years, which is higher than the previous maximum annual build. (Joint Agencies at 116.) The biggest obstacle to increasing solar energy capacity as fast as it's needed is the large amount of flat, sunny land that solar farms require. (Groom) Building solar infrastructure across undeveloped land is an imperfect solution that hurts important ecosystems, eliminates opportunities for natural carbon sinks, and is often opposed by local residents. (Groom, Cart, Courage.)

Installing solar on the roofs of large warehouses in California is a crucial opportunity to use miles of flat, sunny space that would otherwise be wasted. The Inland Empire has an estimated 1 billion square feet of warehouse, or 37 square miles. (Calma.) A recent study found that California's 674 million square feet of big box stores could generate almost 10,000 gigawatt

hours of energy from rooftop solar. (Huxley-Reicher et al.) Because warehouses in the Inland Empire cover much more square footage, their untapped potential is even greater than that.

Each warehouse built with the capacity to provide 100% of its own clean energy via rooftop solar brings California closer to the clean energy targets we must meet in order to avoid the most devastating effects of the climate crisis. The California Attorney General recommends that new warehouses are built with this capacity, and companies and municipalities are realizing it makes sense. (AGO 2021.) The City of Fontana already requires that every warehouse over 400,000 square feet get all its power from rooftop solar. (City of Fontana at 9-73.4) Because this is a feasible mitigation measure, the EIR must require rooftop solar to meet 100 percent of the building's energy needs.

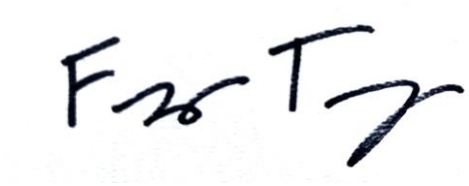
II. CONCLUSION

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report for the Fresno South Central Specific Plan. We urge the City to correct these errors and recirculate an EIR that complies with CEQA.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the City complies with its legal obligations including those arising under CEQA, we would like to remind the City of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (§ 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (July 30, 2020, Nos. D076605, D076924, D076993) ___Cal.App.5th___ [2020 Cal. App. LEXIS 710.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the City with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the City's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the number or email listed below.

Sincerely,



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CENTRAL CALIFORNIA FOOD BANK

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

City of Fresno Planning and Development Department:

I am submitting comments on behalf of Central California Food Bank on the South Central Specific Plan ("SCSP") and the related Environmental Impact Report ("EIR"). I am writing today because I have serious concerns about how the SCSP is currently drafted and the negative impacts it will have in South Central Fresno and the greater Fresno area.

Central California Food Bank is the region's largest hunger relief organization in Central California. From our distribution center, located at 4010 E. Amendola Drive, Fresno, within the boundaries of SCSP, we provide over 60 million pounds of food annually to over 320,000 individuals each month. We do this work through a network of 220+ distribution sites, partnering with other community stakeholders including non-profit organizations, schools, churches and community centers, throughout Central California. We purchased our industrial property in 2018 due to its proximity to Highway 99. This main artery enables us to provide services across Central California. In 2020, we opened an onsite grocery pick-up that positively impacts 2,000 neighbors per month within the SCSP and beyond.

We have 68 employees, many of whom live within the SCSP. We also have an average of 8 workforce development team members in our Workforce Development Program. Individuals within our Workforce Development Program have triumphed over addiction and incarceration. After a short time on our team, we have very high success rates placing them in full-time employment opportunities.

The mitigation strategies within the SCSP would fundamentally change the way we do business and would drastically reduce our community impact. We are particularly concerned with the following mitigation measures.

- Mitigation Measure 4.3-1b: Use Clean Fleets during Construction- this mitigation measure would drastically increase construction/renovation costs making future expansion to meet the need in our community cost prohibitive.
- Mitigation Measure 4.3-1h: Use Low- or Zero-Emission Heavy-Duty Trucks and Equipment- this mitigation measure has an unrealistic timeline (City Planning, PG&E, Construction and truck manufacturer, could not collectively meet this timeline even if costs were not an issue). Zero-Emission trucks do not currently meet our daily route needs. We would need to eliminate routes/distributions with Zero-Emission Heavy-Duty Trucks. To convert our fleet by 2026 is cost prohibitive and is considerably faster and aggressive than state mandates.

- Mitigation Measure 4.3-1i: Use Low- or Zero-Emission Vehicles- the same concerns apply

1 in 4 Central California residents struggle with hunger on a daily basis. Prior to the pandemic, we were serving approximately 280,000 people each month, meeting their needs on a sporadic basis. Today, we are serving over 320,000 people, who identify as having chronic hunger. More people, are seeking our services, more often. In order to meet this growing demand, Central California Food Bank has plans for expansion and renovation on our property. The SCSP would prevent our ability to meet community need in this critical time.

Thank you for taking the time to review our concerns and strongly urge you to decline to adopt the SCSP as it is currently written.

Sincerely,

Kym Dildine
Co-CEO
Central California Food Bank
559-237-3663 x1124
kdildine@ccfoodbank.org

CERTIFIED MEAT PRODUCTS®

ALL THINGS PROTEIN®

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

Dear Ms. Pagoulatos:

My name is Jimmy Maxey and I am submitting these comments on behalf of Certified Meat Products on the South-Central Specific Plan (SCSP) and the related Environmental Impact Report (EIR). I am writing to you because we have significant concerns about this report as it is currently written.

Certified Meat Products (CMP) is a USDA Meat Processor located in South-Central Fresno. My family has been doing business in Fresno since 1954 when my father opened our first company, King-O-Meat. Today, my two sons operate CMP and we have had the privilege to employ many people who call Fresno their home. Many of our people live right here in South Fresno. Our company takes pride in contributing to our community by providing competitive compensation and by financially supporting the needs around our community through donations and support of the many agencies, nonprofits, and churches that are in the trenches every day.

There are several concerns that we have with this report as it is currently written. Some of these concerns are as follows:

- Downzoning
- Buffers
- Mitigation Requirements for new development
- Solar Infrastructure
- Zero Emission Trucks and Equipment
- Several Infrastructure Improvements

Downzoning from Heavy industrial to Light Industrial would be very problematic for our business. It not only devalues an asset, which has a direct impact on our financial health, but it limits our ability to expand and grow, forcing us to look at other alternatives. Since we are located in the food capital of the world, the city should be encouraging manufacturers and other businesses that support the agricultural industries and not artificially limiting the land within which they can locate. We are also concerned with several requirements that the plan states dealing with infrastructural improvements. These requirements call out items that are cost prohibitive and would limit our ability to be competitive outside the state of California. If this plan is adapted as it is written, it would take away our competitive edge of being located in our agricultural heartland.

It is our desire to continue growing our business in the City of Fresno and calling this our home. We need your help to allow us to operate in a community that supports us and helps us succeed. Thank you for considering our comments and I urge you to not adopt the South-Central Specific Plan as it is currently drafted.

Sincerely,

Jimmy Maxey
Founder and Chairman

Physical
4586 E. Commerce Ave.
Fresno, CA 93725

Mailing
P.O. Box 12502
Fresno, CA 93778-2502

Contact
Phone: (559) 256-1433
Fax: (559) 256-1434

Web
CERTIFIEDMEATPRODUCTS.COM

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

July 18, 2024

Dear Sophia,

I am writing on behalf of the Fresno Chamber of Commerce to submit comments on the South-Central Specific Plan ("SCSP") and the related Environmental Impact Report ("EIR"). We have several concerns regarding the SCSP as currently drafted and would like to outline them below.

The Fresno Chamber of Commerce represents a diverse group of businesses within the City and County of Fresno. Our members include long-standing local businesses that have chosen Fresno, particularly South-Central Fresno, as their base of operations. These businesses provide employment to many residents, contribute significantly to the local economy through taxes, and engage in various charitable endeavors. The Chamber has consistently advocated for policies that foster a business-friendly environment, driving economic growth and community development in Fresno.

Downzoning Concerns

The SCSP and the SCSP EIR do not adequately quantify how many properties or the total acreage of land use/zoning changes. The proposed downzoning from Heavy Industrial to Light Industrial, and from Light Industrial to Business Park or Regional Business Park, could significantly impact businesses that serve the agricultural and construction industries. For instance, downzoning could restrict critical uses like "Animal Food Manufacturing" and "Chemical Manufacturing," which are not permitted in Light Industrial zoning. This could severely limit the locations available for these essential operations.

Moreover, the downzoning proposals could disrupt existing businesses and future plans without prior notice to affected property owners. This lack of notification undermines trust and could deter future economic investments in Fresno. Businesses need stability and predictability to make substantial investments, and arbitrary downzoning decisions threaten this stability.

Buffer Zones

The introduction of "buffers" within the SCSP, which restrict or eliminate certain types of developments within 1,000 feet of "sensitive uses," covers nearly half of the SCSP area. This could prohibit warehousing and distribution uses, convert other uses to conditional, and require extensive Health Risk Assessments for all industrial processes. These buffers impose significant burdens on local businesses without clear benefits, potentially driving new industrial developments and jobs to other municipalities. This is counterproductive to Fresno's goal of being an industrial hub.

Improvements/Mitigation Requirements

The SCSP imposes expensive and potentially infeasible mitigation measures on landowners seeking permits. These include:

- **Solar Infrastructure:** Requiring buildings over 400,000 square feet to install rooftop solar panels to supply 100% of their power needs, and other buildings to be solar-ready.
- **Zero Emissions Trucks:** Mandating that all Class 7 and 8 trucks be zero-emission by 2026, a more aggressive timeline than the CARB Advanced Clean Fleets regulation.
- **Promotion of Passenger EVs:** Requiring 10% of all passenger vehicle parking spaces to be EV-ready and 5% to have Level 2 Quick charge EV stations.
- **Zero Emissions Equipment:** Mandating all on-site motorized operational equipment to be zero-emission.
- **Construction Fleets/Equipment:** Requiring the cleanest available fleet of heavy-duty equipment, electric-powered hand tools, forklifts, and prohibiting diesel-powered generators.
- **Other Infrastructure Improvements:** Including various other requirements such as additional electrical room space and prohibiting natural gas infrastructure for non-manufacturing processes.

These measures add significant costs and operational challenges for businesses, potentially stifling economic development and innovation.

We urge the City to reconsider the SCSP as currently drafted. The proposed downzoning, buffer zones, and mitigation requirements impose undue burdens on businesses and could have far-reaching negative impacts on Fresno's economy. Thank you for considering our comments. We hope the City will take our concerns into account and revise the SCSP to better support the local business community.

Sincerely,

Scott Miller, President & CEO
Greater Fresno Area Chamber of Commerce

County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

July 11, 2024

Sophia Pagoulatos
Planning Manager
City of Fresno
(559) 621-8062

SUBJECT: City of Fresno: NOA for Draft EIR – South Central Specific Plan

Dear Ms. Pagoulatos:

The County of Fresno appreciates the opportunity to review and comment on the subject project being reviewed by the City of Fresno. The documents received for this review were circulated to our various Fresno County Public Works and Planning divisions, below are their relevant comments.

Fresno County Transportation Division:

- The County requests the completion of a Transportation Impact Study (TIS) and a Vehicle Miles Traveled (VMT) analysis to assess the potential impacts of the project on county facilities.

Fresno County Road Maintenance and Operations Division:

- Road Maintenance and Operations requests to be included in any traffic impact studies performed as part of this project.

Fresno County Policy Planning Unit:

- The proposed specific plan includes parcels subject to the Williamson Act. If the City did not file a protest with LAFCO during the formation of the Contract, it is recommended that a Notice of Nonrenewal be filed with the County to remove the parcels from the Williamson Act Program before development of incompatible uses occurs. Parcels are still subject to the restrictions of the Williamson Act program during the remainder of the initial term after a Notice of Nonrenewal is recorded.

Fresno County Engineering Section:

- According to FEMA FIRM Panel 2110H and 2130H, a large portion of the subject South-Central Development Area is found to be under shaded Flood Zone X and one of the parcel lots with APN: 463-050-32T of the subject South-Central Development Area is in Flood Zone A which is subject to flooding from the 100-year storm.

- According to the Wetlands Mapper of U.S. Fish and Wildlife Service, wetlands may be present within the parcel lot with APN: 463-050-32T. For any development on wetlands, U.S. Fish and Wildlife Service and other appropriate agencies should be consulted regarding any requirements they may have.

If you have any questions regarding the information described in this letter, please contact me at eracusin@fresnocountyca.gov or (559) 600-4245.

Sincerely,

Elliot Racusin

Elliot Racusin, Planner
Development Services and Capital Projects Division
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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

July 29, 2024

Sophia Pagoulatos, Planning Manager
City of Fresno, Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, California 93721
(559) 621-8062
scsp@fresno.gov

Subject: South Central Specific Plan (Plan)
Draft Environmental Impact Report (DEIR)
SCH No. 2019079022

Dear Sophia Pagoulatos:

The California Department of Fish and Wildlife (CDFW) received a DEIR from the City of Fresno for the Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Plan 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 statute 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.

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 example, projects tiered from the Plan may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of a project tiered from the Plan may result in

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"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 will be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent(s): City of Fresno

Objective: The Plan proposes land use designation changes for certain areas, requiring a General Plan amendment and rezone of the same properties. The changes are proposed primarily to 1) reconcile land use designations with existing conditions, 2) to buffer sensitive uses (e.g., residential areas, Orange Center School) with less intensive uses (e.g., business park instead of industrial), and 3) to provide more opportunities for neighborhood-serving general commercial uses near residential areas. The SCSP would result in substantial reductions in acreage of Heavy Industrial land uses and a modest decrease in Regional Business Park, with corresponding increases in acreage of Business Park, Single-Family Residential, Public, Light Industrial, and General Commercial uses. Growth in the Plan area would be primarily industrial, with smaller amounts of office and retail uses.

Location: The Plan area encompasses 5,567 acres located just south and southeast of downtown Fresno. The Plan area is generally located south of California Avenue, north of American Avenue, and between Fig and Peach Avenues. The area has a range of property types including residential, religious, educational, public, warehouse, and industrial.

Timeframe: Unspecified

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Fresno in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct, indirect, and cumulative impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document for this Plan.

The majority (approximately 60.80 percent) of the approximately 5,567-acre Plan area consists of urban (developed) areas containing industrial, commercial, and residential

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development and associated roads and infrastructure. Urban land is dominant near the intersection of State Route (SR) 99 and SR 41 extending southeast along SR 99. Lands along the west, south, and eastern margins of the Plan area are mapped as agricultural land, which comprises approximately 39 percent of the Plan area. Small discontinuous patches of annual grassland (0.21 percent) and lacustrine (ponded) habitat (0.10 percent) are also present throughout the Plan area.

The DEIR acknowledges that the Plan area is within the geographic range of several special-status animal species and proposes specific mitigation measures to reduce impacts to less than significant. CDFW has concerns about the ability of some the proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for several special status animal species, including the State threatened Swainson's hawk (*Buteo swainsoni*), the State candidate endangered Crotch's bumble bee (*Bombus crotchii*), and the State species of special concern burrowing owl (*Athene cunicularia*).

Swainson's Hawk

Comment 1: SWHA Pre-construction Surveys

Mitigation Measure 4.4-1e is provided to mitigate for potential impacts to Swainson's hawk (SWHA) from project's tiered from this Plan and states that SWHA pre-construction surveys will be conducted within 14 days before the onset of project activities during the breeding season. CDFW does not concur this measure is sufficient to adequately mitigate for impacts to SWHA and recommends that preconstruction surveys for projects tiered from this Plan be conducted following the survey methodology developed by the SWHA Technical Advisory Committee (TAC) (SWHA TAC 2000). Please note SWHA TAC survey protocol includes early season surveys to assist the project proponent in implementing necessary avoidance and minimization measures, and in identifying active nest sites prior to initiating ground-disturbing activities.

Comment 2: SWHA Buffer Distance and Consultation

Mitigation Measure 4.4-1e also states that SWHA no-disturbance buffers would be ¼-mile for areas in urban development and ½-mile in areas away from urban development. CDFW would like to note that there should not be a differentiation in buffer distance for urban and non-urban nests and recommends that if project activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and active SWHA nests are present, that a minimum ½-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers would remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, to prevent

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nest abandonment and other take of SWHA. CDFW also recommends that in the event an active SWHA nest is detected for project tiered from this plan, and a ½-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Crotch's Bumble Bee

Comment 3: CBB Habitat Assessment and Surveys

The DEIR states within the special status species evaluation table that the Plan area has a low potential for Crotch's bumble bee (CBB) due to lack of sightings recorded on the California Natural Diversity Database (CNDDB). CDFW does not concur that the entirety of the Plan area has a low potential for CBB and would like to note that CNDDB is a positive occurrence database only, which can be reliable for determining presence of a species but unreliable as a primary source for concluding absence. As such, CDFW recommends that projects tiered from this Plan conduct a habitat assessment for CBB. If suitable habitat is present, CDFW recommends conducting protocol surveys following the "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species" (CDFW 2023). If surveys indicate the presence or potential presence of CBB, consultation with the CDFW is recommended for guidance on the development of mitigation measures such as take avoidance, minimization, and mitigation. If take cannot be avoided, then take authorization through acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b) is necessary to comply with the California Endangered Species Act (CESA).

Burrowing Owl

Comment 4: BUOW Consultation

Mitigation Measure 4.4-1d is provided to mitigate for potential impacts to burrowing owl (BUOW) from project's tiered from this Plan. CDFW concurs with this measure but recommends that, in the event BUOW are detected during surveys and the no-disturbance buffers identified within the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) are unable to be maintained, consultation with the CDFW occur for guidance on the development of mitigation measures such as take avoidance, minimization, and mitigation.

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Editorial Comments and/or Suggestions

California Natural Diversity Database (CNDDB): Please note that the CNDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDB does not mean that a species is not present. In order to adequately assess any potential Plan-related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special status species are present.

Lake and Streambed Alteration: Activities for future projects tiered from this Plan that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document for projects tiered from this Plan does not adequately describe the project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (https://wildlife.ca.gov/Conservation/LSA) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Nesting birds: CDFW encourages that ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), a project applicant is responsible for ensuring that implementation of the project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

To evaluate project-related impacts on nesting birds, CDFW recommends that a general habitat assessment for nesting birds be conducted as part of the biological technical studies conducted in support of the CEQA document for projects tiered from this Plan. Depending on the results of that assessment, CDFW further recommends that the CEQA document for projects tiered from this Plan include that a qualified biologist

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conduct a pre-construction survey for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around a project site to identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by a project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the project site would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, Section 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during surveys to CNDDB. The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

Filing Fees

The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Plan approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

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CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City of Fresno in identifying and mitigating Plan impacts on biological resources. Questions regarding this letter or further coordination should be directed to Kelley Nelson, Environmental Scientist, at (559) 580-3194 or Kelley.Nelson@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Sarah Paulson
E9964E60293D40A...

For Julie A. Vance
Regional Manager

ec: California Department of Fish and Wildlife
Kelley Nelson, Kelley.Nelson@wildlife.ca.gov
CESA R4CESA@wildlife.ca.gov
LSA R4LSA@wildlife.ca.gov

Justin Sloan, USFWS, Justin Sloan@fws.gov

Linda Connolly, Linda.Connolly@wildlife.ca.gov

State Clearinghouse
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REFERENCES

California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. Sacramento, California, USA.

CDFW. 2023. Survey considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. California Department of Fish and Wildlife, Sacramento, California, USA.

Swainson's hawk technical advisory committee (SWHA TAC). 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in the central valley of California. Swainson's Hawk Technical Advisory Committee.

DIRK POESCHEL
Land Development Services, Inc.
923 Van Ness Avenue, Suite 200 • Fresno, California 93721
559/445-0374 • Fax: 559/445-0551 • email: dirk@dplds.com

July 30, 2024

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

SUBJECT: South Central Specific Plan - 3641 S. Cherry Ave. Fresno

Dear Ms. Pagoulatos:

I am writing on behalf of my client Mr. Daniel Barandalla dba D & I Farms. Mr. Barandalla owns the subject 11.50 +/- acre property (property) on the west side of S. Cherry Ave. in the unincorporated portion of Fresno County. The property is within the City of Fresno Sphere of Influence and is within the South Central Specific Plan (Plan).

Mr. Barandalla purchased the property designated and zoned for *industrial* uses in the adopted City of Fresno General Plan. The purchase price Mr. Barandalla paid for the property reflected the extra value of the industrial zoning and opportunity for development consistent with that zone.

The following are my comments on the Plan, Draft Environmental Impact Report (DEIR, SCH. No. 2019079022) and proposed Community Truck Reroute Study: Truck Routing and Implementation Strategies Report. Plan is used interchangeably in this correspondence to describe the three aforementioned documents.

1. Figure 4-5 entitled Specific Plan Proposed Planned Land Use designates the property for *Business Park* but designates a small portion of the property for *Low Density Residential* uses. A small residential building existed on the site that Mr. Barandalla converted with permits to an office. Therefore, no residential uses exist on the site.

   Please remove the *Low Density Residential* designation and replace the designation with *Business Park* making the entre site designated for *Business Park* and make the corresponding changes to the project EIR. Numerous and continual conflicts will occur if a residential use is allowed in the middle of a business park.

2. Mr. Barandalla reluctantly does not oppose the property being designated as a *Business Park.* However, the *Business Park* designation is not his preference.

3. John Kinsey, Esq. of the law firm Wanger Jones Helsey in Fresno has submitted a comprehensive analysis of the issues associated with the proposed Plan, associated Community Truck Reroute Study: Truck Routing and Implementation Strategies Report and related DEIR. But for my client's reluctant concurrence with the proposed recommended *Business Park* designation, he agrees with Mr. Kinsey's conclusions and recommendations regarding the proposed onerous and impractical development standards such as setbacks and sees no reason to recite them and incorporates Mr. Kinsey's comments herein by reference.

4. The effort to reduce impacts of industrial land use in the subject area should be placed in context. Much of the area within the Plan was designated for industrial uses for decades due to the proximity to rail, state highways, a work force and raw products.

   Most of the objections to industrial uses cite projects that were approved prior to the adoption of stringent environmental regulations that protect communities and the environment. Some of the uses being cited as objectionable existed prior to the adoption of a zoning ordinance by the City or County of Fresno. As you are aware, zoning ordinances provide substantial regulatory authority to protect public health, safety and welfare.

   The Plan's proposed adoption of special zoning standards is unnecessary in light of the comprehensive review that all projects must undergo as mandated by the California Environmental Quality Act (CEQA). Further, modern industrial uses are subject to various land use permits that provide another level of regulatory scrutiny to assure, among other things, compatibility with surrounding properties.

   Modern industrial parks are operated by employees who rightfully expect to work in a safe, clean and healthy environment. In fact, specific state and federal agencies are charged with assuring that a safe, clean and healthy environment is maintained at the workplace.

   The transportation of goods and materials from a modern industrial park shares few similarities with industrial development of even 30 years ago. Federal, state and local regulations protect the drivers of the transport vehicles and the communities in which the transport vehicles travel. Regular and unannounced inspections by law enforcement also play a key role in assuring the safe transportation of goods. Said monitoring and enforcement includes driver training, special driver and vehicle licensing, materials packaging and handling standards, mandatory fire and prevention measures and materials identification for environmental and fire protection purposes.

   Leakage of harmful gaseous and liquid materials is also highly regulated by agencies prepared to address spillage and ruptures and other similar hazardous events in a responsible manner. Liabilities for environmental degradation are severe.

Modern industrial buildings must adhere to strict building and fire code regulations to assure public and worker safety. Hazardous material must be segregated, rated for toxicity and stored and handled according to various federal and state health and safety protocols.

Obnoxious odors, fugitive dust and other air born emissions are also strictly monitored in a modern industrial park as is storm water with collection and filtration prior to being allowed to enter a drainage basin. These characteristics of a modern industrial park are applicable in any location in California.

Creating unnecessary barriers to economic competition with other parts of the city or region directs the valuable industrial business base out of or away from the city thwarting a decades long effort to expand the area's economy so it is not solely reliant on agriculture. Many urban economists have long argued that residential uses underpay their share of municipal services costs. In fact, the revenue from industrial commercial uses allows municipalities to fund adequate police, fire, parks and other services citizens demand.

An unintended and secondary consequence of this Plan and its unnecessary regulation of industrial uses is the reduced demand of industrial users to operate in the City of Frenso. This reduced industrial demand will generate lower tax revenues from industrial users creating a larger gap between the city's needs and its ability to fund the services citizens demand. The city's jobs housing balance is also adversely affected as industrial jobs simply go elsewhere.

No attempt was made in the Plan or its EIR to quantify these adverse impacts to the city's economic base from an environmental or cost benefit perspective. The proposed Plan is contrary to the principle goal of the City of Fresno General Plan ECONOMIC DEVELOPMENT AND FISCAL SUSTAINABLITY section which begins with this statement:

> *Fresno's economy plays a crucial role in the physical development of the Planning Area and the City's ability to support implementation of General Plan policies and programs. The City is committed to economic development and fiscal sustainability. In fact, the outcome of many other General Plan initiatives is tied to the city's economic success. More specifically, to further this commitment, this element focuses on improving the business climate, retaining local businesses, developing a high skilled labor force, attracting new industries, supporting the tax base, and sustaining the City's ability to provide public services for current and future residents*

Please consider allowing a more reasoned solution to protecting Fresno neighborhoods and its economic base. Thank you for the opportunity to comment on the Plan, associated Community Truck Reroute Study: Truck Routing and Implementation

Strategies Report, and related environmental impact report. If you have any questions, please feel free to contact me.

Sincerely,

Dirk Poeschel

Dirk Poeschel, AICP

cc: Mr. Daniel Barandalla
Mr. Amir Dehlan
Ms. Jennifer Clark
John Kinsey, Esq.

https://dplds.sharepoint.com/shared documents/current clients/d & i farms- s cherry ave -23-43/correspondence/deir comments.docx

DONAGHY SALES

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City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Dear Planning Manager Pagouloatos:

Thank you for the opportunity to submit comments on the City of Fresno's proposed South Central Specific Plan and the related Draft Environmental Impact Report. I am writing to submit comments on behalf of Donaghy Sales as its President.

Who We Are

Donaghy is the leading beverage distributor of Central California, selling over 1,000 brands of beer, wine, spirits, and non-alcoholic beverages. We are the exclusive distributor of a diverse portfolio representing 95 suppliers, including global leaders as well as small batch local producers. Founded in 1969, we are a third generation, family-owned and -operated company, proudly providing exceptional service and quality products to valued customers across our 26-county territory, which extends from Butte County in the north down to Tulare County in the south. Central California is our home. While our main warehouse and company headquarters is located in the Plan Area at 2623 South Cedar Avenue, we also maintain warehouses in Stockton, Watsonville, and Sacramento. Since our founding, we have made community involvement and employee welfare top priorities, providing no cost health insurance to over 850 full-time employees and thousands of dependents, consistently supporting local charities across our service area, and sponsoring hundreds of multicultural events in the communities where we operate.

We have been operating out of South Central Fresno since 1969. In addition to being the home of our founder, Ed Donaghy, Fresno's central location and close proximity to key Central California transportation corridors make it an attractive option for a company like ours. Additionally, hundreds of our employees are Fresno residents, including many residing in the Plan Area. As such, we have made significant investments to improve conditions for our Fresno employees and to enhance the local community. Our Fresno facility is a clean, state-of-the-art operation with a long track record without community complaints. This is due in part to Donaghy's similarly long track record of giving back to the Calwa community, including its contributions to the renovation of the recreational facilities at Calwa Community Park. Indeed, we are deeply committed to supporting local charities and nonprofit organizations, making annual contributions to over 50 organizations, including African American Historical and Cultural Museum, Arte Americas, Association of Mexican Educators, Breaking the Chains, Catholic Charities, Fresno Food Bank, Friends of Calwa, Habitat for Humanity, Hispanic Business Foundation, Marjaree Mason Center, Poverello House, Leukemia and Lymphoma Society, CSUF Chicano Association, Central California Hispanic Chamber of Commerce, Consulate of Mexico – Fresno, Knights of

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2363 S. Cedar Ave
Fresno, CA 93725
T 559.486.0901
F 559.486.2728
donaghysales.com

Columbus, Central California Women's Conference, and Fresno Metro Black Chamber of Commerce—just to name a few.

Concerns Regarding the South Central Specific Plan and the Draft EIR

Donaghy has significant concerns regarding the City's proposal to add "buffers" that restrict or eliminate certain types of development on properties within 1,000 feet of "sensitive uses," defined as "residences, schools, religious institutions, playgrounds, child-care centers, hospitals, retirement homes, and convalescent homes."

Areas Affected by Buffer Zone Requirements. Initially, it is unclear how the proposed buffer concept affects properties like Donaghy's headquarters, which is located in the Plan Area within 1,000 feet of a sensitive use located *outside* the Plan Area. Figure 5-2 of the South Central Specific Plan Public Review Draft appears to suggest Donaghy's property will *not* be subject to a buffer zone. Yet, at the same time, the definition of "sensitive uses" on page 68 does not appear to be limited to uses within the Plan Area, suggesting Donaghy's property *will be* subject to a buffer zone. Adopting the proposed buffer zone concept without providing clear notice to Donaghy how its property will be impacted is not only unfair, it denies Donaghy a meaningful opportunity to comment on the proposed plan, as we are left to guess whether our property will be subjected to the heightened requirements for properties within a buffer area. Making matters worse, Donaghy cannot be the only property owner in this situation. Others may have reasonably relied on Figure 5-2 to conclude that their properties will not be subject to the heightened requirements for buffer areas. The lack of clarity could also lead to inconsistent and arbitrary enforcement of the buffer area requirements among City staff.

To address these issues, the City should decline to adopt the South Central Specific Plan, as proposed. Instead, the City should clarify the definition of "sensitive uses" and confirm that the buffer area requirements *do not* apply to properties like Donaghy's. To the extent the City does intend to apply the buffer area requirements to properties like Donaghy's, then to avoid depriving Donaghy of a meaningful opportunity to comment on the proposed plan, as well as other landowners who may have reasonably relied on Figure 5-2 to conclude they will not be affected by the buffer zone requirements, the City must clarify how it intends to apply the buffer concept with respect to uses located outside the Plan Area and allow for an additional public comment on the proposed plan, as clarified.

Heightened Requirements in Buffer Zones. Assuming Donaghy *would* be subject to the heightened requirements for buffer zones, contrary to what is indicated in Figure 5-2, Donaghy is concerned that the buffer zone requirements are in many cases excessive or unnecessary and would make new or expanded uses at Donaghy's Fresno facility infeasible. Our understanding is that if the proposed plan is adopted and Donaghy later desires to expand its existing facilities, to engage in a new warehousing, distribution, or storage use, or to construct new facilities for such uses, then it will be required:

- To obtain a conditional use permit from the City;

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- To meet the California Air Resources Board's criteria for zero or near zero emissions facilities as defined in the July 2016 California Sustainable Freight Action Plan; and

- To comply with a number of other costly and time-consuming requirements, including using the cleanest construction equipment available on the market, ensuring all on-site motorized operational equipment is zero emissions, using only electric fleets during construction, converting truck fleets to all electric vehicles sooner than required by the California Air Resources Board, payment of substantial fees for all emissions above the San Joquin Valley Air Pollution Control District thresholds of significance, prohibitions on use of natural gas, prohibitions against having loading/unloading areas within 1,000 feet of sensitive receptors, and solar power mandates, among other things.

These requirements would impose a significant financial and procedural burden and would significantly undermine the feasibility and desirability of proceeding with any such projects at Donaghy's Fresno facility. The requirement to obtain a conditional use permit would inject significant expense and uncertainty into potential projects while also drastically increasing the time needed to complete them and the risks associated with project opponents.

Additionally, while there can be little doubt that compelling compliance with the 2016 Sustainable Freight Action Plan would be costly and time-consuming, it appears the 2016 Sustainable Freight Action Plan does not actually specify many concrete standards. As a result, it is unclear what the requirement to comply with this document actually means and whether it will impose more or less demanding standards than what is required under the California Air Resources Board's existing zero emissions regulations. Complying with more onerous electrification requirements would obviously increase an already-significant financial burden. Moreover, it seems imprudent to mitigate perceived environmental impacts based on as-yet undefined standards and requirements that may ultimately impose a substantial financial burden in exchange for a relatively minor environmental benefit.

The various other construction and operational requirements would be similarly costly and would also likely render many new or expanded uses infeasible at our Fresno location—independent from the issues described above. In addition to being extremely costly, these requirements are novel. No similar requirements exist in the other jurisdictions where our facilities are located. It is therefore difficult to imagine any circumstances in which a reasonable business case could be made to proceed with new or expanded uses at our Fresno facility rather than at our locations in Stockton, Watsonville, and Sacramento, or in other Central Valley jurisdictions, such as Madera County or the City of Visalia, that lack buffer zones or onerous development standards such as those proposed here.

That the new requirements may not apply to Donaghy's existing operations ultimately does little to improve the situation. Our business is not static. To continue to be competitive, it is imperative that we remain dynamic and adaptable—able to meet new challenges and opportunities as and when they arise, such as expanding or altering our existing operations to meet increased demand or changing market conditions. However, the limitations and uncertainty created by the

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buffer zone requirements would make this very difficult. Among other things, our company would struggle to compete with other large distributors, particularly with respect to securing new suppliers and products. This would be very harmful to our business, and could even necessitate downsizing our Fresno operation and instead expanding our existing facilities in Stockton, Watsonville, and Sacramento, or finding new facilities in other business-friendly climates to the north and south of Fresno. Either scenario would of course also have the unintended consequence of transferring many high quality jobs out of Fresno.

In light of the above, the City should decline to adopt the South Central Specific Plan as proposed. The City should instead eliminate or substantially limit the geographic scope of the buffer zone concept, remove the requirement for a conditional use permit for new or expanded warehousing, distribution, or storage uses on properties in a buffer zone, remove the requirement to comply with the 2016 Sustainable Freight Action Plan, and remove or substantially reduce the host of construction and operational requirements for facilities located in a buffer zone.

Conclusion

For all of the reasons mentioned above, Donaghy urges the City not to adopt the South Central Specific Plan as currently proposed. The proposed plan is unclear in key respects and threatens to make many new or expanded uses infeasible in the Plan Area moving forward without giving appropriate consideration to how the proposed plan will impact businesses or the extent to which it will incentivize businesses to pursue employment-generating projects in other markets rather than the City of Fresno.

Thank you for the opportunity to comment on the proposed plan.

Sincerely,

Ryan Donaghy
President
Donaghy Sales

DUMONTprinting

July 29, 2024

Sophia Pagoulatos, Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Dear Ms. Pagoulatos,

I am writing on behalf of Dumont Printing to submit comments on the South-Central Specific Plan ("SCSP") and the related Environmental Impact Report ("EIR"). The SCSP's imposition of zoning downsizing, buffer zones, and improvement/mitigation requirements are a serious concern for our continued operation in the City of Fresno.

Our company has operated at 1333 G Street in Fresno since 1984. When we chose to establish our company, Fresno offered us tremendous value and opportunity, access to a quality workforce, affordable space, logistical advantages, etc. These advantages have enabled us to provide quality job opportunities, contribute significant taxes to bolster the City's revenue, assist with various charitable efforts, etc..

As a manufacturing company, the proposed downzoning of our property from current zoning to proposed zoning could result in us being considered a legal non-compliant use. This would significantly hamper our ability to expand our operations and leave us uncertain of our ability to operate in Fresno going forward.

The SCSP's implementation of buffer zones could convert our use to conditional; require extensive Health Risk Assessments, leaving us unsure of our ability to operate at our location long-term while significantly increasing operational costs, resulting in possible financial instability.

Moreover, the imposition of requirements to install or purchase [Solar Infrastructure, Zero Emissions Fleet, Promotion of Passenger EVs, Zero Emissions Equipment, Construction Fleets/Equipment, Other Infrastructure Improvements] is not economically feasible for our company at this time.

The above-mentioned actions will result in a substantial increase in operational costs, limit our ability to access capital or insurance, and jeopardize our ability to provide consistent, competitive pricing to our customers; expand our operations and workforce opportunities and compensation.

We are proud to have operated in Fresno for as long as we have, but the proposed changes in the SCSP bring into question whether we can retain and grow our business in the long-term. We urge the City to reconsider the proposed changes [downzoning, buffer zones, etc] as it could significantly compromise our ability to continue operating in the City of Fresno. Thank you for considering our comments.

Sincerely,

Susan D. Moore

Susan D. Moore

President & Owner

PO Box 12726 | Fresno, CA 93779 • 1333 G Street | Fresno, CA 93706

559-485-6311 *phone* | 800-248-6311 *toll-free* | 559-485-6357 *fax*

2907 S. Maple Avenue
Fresno, California 93725-2208
Telephone: (559) 233-7161
Fax: (559) 233-8227

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July 15, 2024

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

RE: City of Fresno South Central Specific Plan Draft Environmental Impact Report
FID Facilities: Various

Dear Ms. Pagoulatos:

The Fresno Irrigation District (FID) has reviewed the South Central Specific Plan Draft Environmental Impact Report for the City of Fresno. FID has the following comments:

1. FID previously reviewed and commented on the Revised Notice of Preparation for the South Central Specific Plan Project on May 17, 2021, and Notice of Preparation of an Environmental Impact report on July 26, 2019, as City of Fresno South Industrial Priority Area Specific Plan Notice of Preparation. Those comments and conditions still apply and a copy has been attached for your review.

Thank you for providing to us the South Central Specific Plan Draft 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. FID reserves the right to provide additional comments when more detailed information becomes available. If you have any questions please feel free to contact Jeremy Landrith at (559) 233-7161 extension 7407 or jlandrith@fresnoirrigation.com.

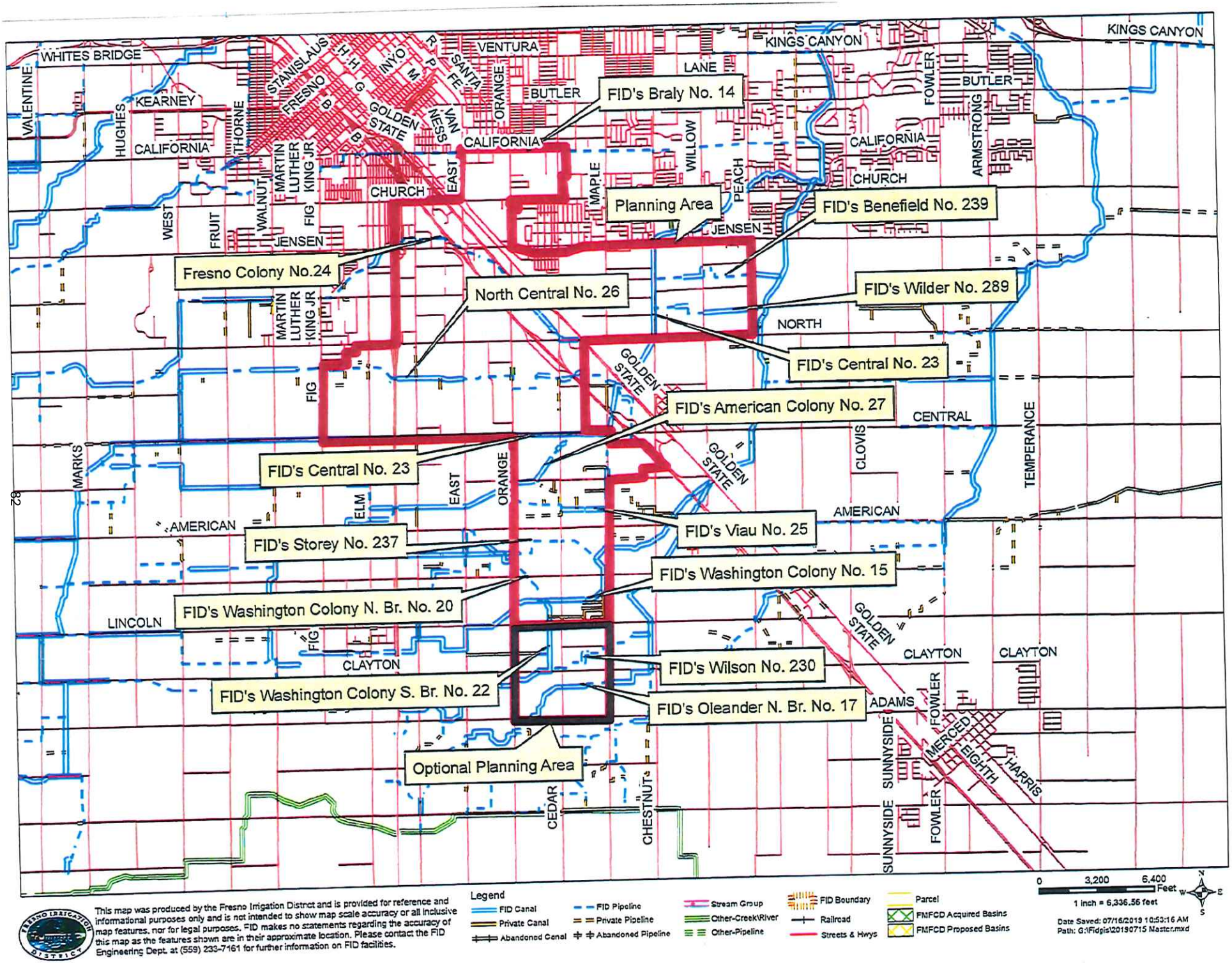
Sincerely,

Laurence Kimura, P.E.
Chief Engineer

Attachments

G:\Agencies\FresnoCity\EIR\Fresno - South Central Specific Plan - NOP -EIR\Fresno - South Central Specific Plan - EIR.doc

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



This map was produced by the Fresno Irrigation District and is provided for reference and informational purposes only and is not intended to show map scale accuracy or all inclusive map features, nor for legal purposes. FID makes no statements regarding the accuracy of this map as the features shown are in their approximate location. Please contact the FID Engineering Dept. at (559) 233-7161 for further information on FID facilities.

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

PROBABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

The Draft EIR analyzes potential significant effects of the proposed plan related to:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Employment, and Housing
- Public Services and Recreation
- Transportation and Circulation
- Utilities and Service Systems
- Cumulative Effects

Mitigation measures identified in the Draft EIR would not reduce potentially significant effects related to the following areas to less-than-significant levels: aesthetics, agriculture and forestry resources, air quality, cultural and tribal cultural resources, greenhouse gas emission and climate change, and noise. There are properties within the Plan Area that are known to have contaminated groundwater, aquifers, and soils that require cleanup consistent with 65962.5. Six of the sites are considered active and others are in the process of assessment, remediation or have been closed.

Public hearings will be held, subsequent to the public review period, at a time and place to be specified by legal advertisement. If you would like to be notified of the hearings or would like additional information please contact:

Sophia Pagoulatos, Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Email: scsp@fresno.gov
Telephone: Sophia Pagoulatos (559) 621-8062 or
Adrienne Asadoorian-Gilbert (559) 621-8339

AVISO DE EXTENSIÓN DE TIEMPO: PARA EL PERIODO DE COMENTARIO PÚBLICO PARA EL REPORTE DE IMPACTO AMBIENTAL PARA EL PLAN ESPECÍFICO CENTRO SUR (SCH#2019079022)

El 31 de mayo de 2024, un Aviso de Disponibilidad se dio aviso que la Ciudad de Fresno (Ciudad), como la Agencia Principal, ha terminado un Reporte de Impacto Ambiental (PEIR) Borrador para el Plan Especifico del Centro Sur, el cual estará siendo distribuido para revisión pública en conformidad con la Ley de Calidad Ambiental de California (CEQA) y el Código de Recursos Públicos de California, comenzando un periodo de comentario público de 45 días que se terminará el 15 de julio de 2024.

Este aviso es para anunciar que el periodo de comentario público ha sido extendido por 15 días hasta el 30 de julio de 2024, para permitir agencias públicas y partes interesadas un total de 60 días para revisar y entregar comentarios sobre el Borrador EIR. En volver a notificar sobre el Borrador EIR, la Ciudad continua de proporcionar acceso a los documentos e información sobre otros métodos de ver el Borrador PEIR.

LOCALIZACIÓN DEL PROYECTO

El Área del Plan abarca 5.567 acres situados justo al sur y al sureste del centro de Fresno. El Área del Plan se encuentra generalmente al sur de California Avenue, al norte de American Avenue y entre Fig y Peach Avenues. La zona cuenta con una amplia gama de tipos de propiedades, entre ellas industriales, almacenes, comerciales, residenciales, religiosas, educativas y públicas.

DESCRIPCIÓN DEL PROYECTO

El área del Plan alberga casi 19.6 millones de pies cuadrados de desarrollo no residencial y aproximadamente 400 unidades residenciales. El Plan asume que en 2040 se habrán construido 12 millones de pies cuadrados adicionales de usos no residenciales y 91 unidades de vivienda. El crecimiento en la zona del Plan sería principalmente industrial, con pequeñas cantidades de usos de oficina y comercio minorista. Se permitirían otros usos del suelo de acuerdo con las designaciones de uso del suelo del Plan General, pero no son el enfoque del Plan.

El desarrollo económico y el crecimiento del empleo son los principales impulsores del Plan. Como se indica en el borrador del EIR, en 2040 se habrán creado más de 14,000 nuevos puestos de trabajo con el desarrollo previsto, principalmente en el sector industrial, con un crecimiento menor, pero sustancial, de los puestos de trabajo en oficinas y comercios.

Desarrollo previsto para el Plan propuesto comparado con las condiciones existentes

Designación del uso del suelo	Existente (metros cuadrados)	Plan propuesto (metros cuadrados) para 2040
Comercio	0	866,676
Oficina	10,912	578,790
Industrial	19,624,154	10,576,278
Total No residencial	19,635,066[1]	12,021,744
Unidades residenciales	400 viviendas	91 viviendas

Notas: [1] El desarrollo existente sólo refleja las categorías de uso del suelo de empleo dentro del Área del Plan Específico.

Fuente: Ascenso 2023.

El Plan propone cambios en la designación del uso del suelo para determinadas zonas, lo que requiere una modificación del Plan General y la recalificación de las mismas propiedades. Los cambios se proponen principalmente para 1) reconciliar las designaciones de uso del suelo con las condiciones existentes, 2) amortiguar los usos sensibles (por ejemplo, zonas residenciales, Orange Center School) con usos menos intensivos (por ejemplo, parque empresarial en lugar de industrial), y 3) proporcionar más oportunidades para usos comerciales generales al servicio del vecindario cerca de las zonas residenciales. El Plan daría lugar a reducciones sustanciales en la superficie de los usos industriales pesados y a una modesta disminución en el parque empresarial regional, con los correspondientes aumentos en la superficie de los usos de parque empresarial, residencial unifamiliar, público, industrial ligero y comercial general.

DISPONIBILIDAD DEL DOCUMENTO

Direcciones donde estará disponible una copia del borrador del EIR Para su Revisión:

Ciudad de Fresno
Planning and Development Department
2600 Fresno Street, Third Floor, Rm 3043
Fresno, CA 93721

Biblioteca Pública del Condado de Fresno
2420 Mariposa Street
Fresno, CA 93721

Biblioteca Mosqueda
4670 E Butler Ave
Fresno, CA 93702

Biblioteca West Fresno
188 E California
Fresno, CA 93706

El Borrador del EIR también se puede obtener en la página web del Ayuntamiento:

https://www.fresno.gov/planning/plans-projects-under-review/#south-central-specific-plan-scsp

PERIODO DE COMENTARIO PUBLICO

La Ciudad de Fresno recibirá comentarios públicos sobre el Borrador del EIR desde el **31 de mayo de 2024** hasta el **30 de julio de 2024**. Los comentarios por escrito deberán ser recibidos **a**

más tardar a las 5pm (PST) del 30 de julio de 2024. Por favor envíe sus comentarios por escrito a Sophia Pagoulatos e incluya su nombre, dirección y número de teléfono y/o dirección de correo electrónico para que podamos comunicarnos con usted para aclaraciones, si es necesario. Los comentarios pueden entregarse en persona, por correo de primera clase o por correo electrónico a:

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Atención: Sophia Pagoulatos, Planning Manager
Teléfono: (559) 621-8062
Correo electrónico: scsp@fresno.gov

PROBABLES EFECTOS AMBIENTALES SIGNIFICATIVOS

El Borrador del EIR analiza los posibles efectos significativos del plan propuesto en relación con:

- Estética
- Recursos Agrícolas y Forestales
- Calidad del Aire
- Recursos Biológicos
- Recursos Culturales y Culturales Tribales
- Energía
- Geología y Tierras
- Emisiones de Gases de Efecto Invernadero y Cambio Climático
- Peligros y Materiales Peligrosos
- Hidrología y Calidad del Agua
- Uso del Suelo y Planificación
- Ruido
- Población, Empleo, y Vivienda
- Servicios Públicos y Recreación
- Transporte y Circulación
- Utilidades y Sistemas de Servicio
- Efectos Acumulativos

Las medidas de mitigación identificadas en el Borrador del EIR no reducirían los efectos potencialmente significativos relacionados con las siguientes áreas a niveles menos que significativos: estética, recursos agrícolas y forestales, calidad del aire, recursos culturales y culturales tribales, emisión de gases de efecto invernadero y cambio climático, y ruido. Hay propiedades dentro del Área del Plan que se sabe que tienen aguas subterráneas, acuíferos y suelos contaminados que requieren limpieza de acuerdo con 65962.5. Seis de los sitios se consideran activos y otros están en proceso de evaluación, remediación o han sido cerrados.

Se convocarán audiencias públicas tras el periodo de revisión pública, a la hora y en el lugar que se especifiquen mediante anuncio legal. Si desea que se le notifiquen las audiencias o desea información adicional, póngase en contacto con:

Sophia Pagoulatos, Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Correo electrónico: scsp@fresno.gov
Teléfono: Sophia Pagoulatos (559) 621-8062 or
Adrienne Asadoorian-Gilbert (559) 621-8339

2907 S. Maple Avenue
Fresno, California 93725-2208
Telephone: (559) 233-7161
Fax: (559) 233-8227

CONVEYANCE. COMMITMENT. CUSTOMER SERVICE.

May 17, 2021

Jennifer Clark
Development and Resource Management Department
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

RE: City of Fresno Revised Notice of Preparation for the South Central Specific Plan Project
FID Facilities: Various

Dear Ms. Clark:

The Fresno Irrigation District (FID) has reviewed the Revised Notice of Preparation for the South Central Specific Plan Project for the City of Fresno. FID has the following comments:

1. FID previously reviewed and commented on the Notice of Preparation of an Environmental Impact report on July 26, 2019 as City of Fresno South Industrial Priority Area Specific Plan Notice of Preparation. Those comments and conditions still apply and a copy has been attached for your review.

Thank you for providing to us the Revised Notice of Preparation for the City of Fresno's South Central Specific Plan Notice of Preparation 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. FID reserves the right to provide additional comments when more detailed information becomes available. If you have any questions please feel free to contact Jeremy Landrith at (559) 233-7161 extension 7407 or jlandrith@fresnoirrigation.com.

Sincerely,

Laurence Kimura, P.E.
Chief Engineer

Attachments

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

Jeremy Landrith

From: Summer Cecil <Summer.Cecil@fresno.gov>
Sent: Wednesday, April 14, 2021 7:49 AM
To: SCSP
Subject: [NOTICE] REVISED - Notice of Preparation SCSP EIR
Attachments: Recirculated NOP_SCSP EIR - REVISED.pdf

Good morning—

Please be advised of the recirculated Revised Notice of Preparation (NOP) of the South Central Specific Plan Environmental Impact Report (EIR) [attached].

The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of the information to be included in the EIR. **This notice extends the public review period to May 14, 2021.**

The City invites you to provide your comment at the next scoping meeting, via Zoom:
April 28, 2021 from 6:00-8:00PM
https://zoom.us/j/98373607907
or dial: 1-669-900-9128
Meeting ID: 983 7360 7907

Feel free to also provide comment:

- By clicking here (link to surveymonkey);
- By sending an email to SCSP@fresno.gov; or
- Sending a letter to:
  Planning and Development Department
  2600 Fresno Street, Suite 3065
  Fresno, CA 93721

Thank you,

Summer Cecil
Project Manager | Planning and Development
559-621-8166
Summer.Cecil@fresno.gov
Planning ▪ Preserving ▪ Promoting | Quality Neighborhoods
City of Fresno

REVISED NOTICE OF PREPARATION

TO EXTEND COMMENT PERIOD

Date:	April 14, 2021
To:	Responsible Agencies, Interested Parties, and Organizations
Subject:	Notice of Preparation of an Environmental Impact Report for the South Central Specific Plan Project, Fresno, California
Lead Agency:	City of Fresno
Contact:	Jennifer Clark, Director c/o Cherie Vick, Executive Assistant Planning and Development Department 2600 Fresno Street, Room 3065 Fresno, CA 93721 (559) 621-8003 Jennifer.Clark@fresno.gov Cherie.vick@fresno.gov
Comment Period:	March 24, 2021 to May 14, 2021
Note to Reader:	The City of Fresno (City) is recirculating this Notice of Preparation (NOP) to reflect revisions to the South Central Specific Plan, formerly referred to as the South Industrial Priority Area Specific Plan and to extend the comment period to May 14, 2021. Please refer to subheading, "Project Description," for more information. All comments previously submitted to the City during the 2019 NOP public review period (July 8 to August 6, 2019) have been retained by the City. **The comment period for this re-circulated Notice of Preparation (NOP) has been extended to May 14, 2021. If you submitted comments previously, they have been retained and do not need to be resubmitted.**

PURPOSE OF NOTICE

The City of Fresno is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the proposed South Central Specific Plan project (proposed project), located in the City of Fresno. Pursuant to provisions of the California Environmental Quality Act (CEQA), the City has prepared this NOP for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

The EIR will provide an evaluation of potential environmental impacts associated with the proposed project. A brief project description, location, and potential environmental issue areas that may be affected by development of the proposed project are described below. The EIR will evaluate the potentially significant environmental impacts of the proposed project, on both a direct and cumulative basis, identify

mitigation measures that may be feasible to lessen or avoid such impacts, and identify alternatives to the proposed project.

PUBLIC REVIEW PERIOD

This NOP was re-circulated for public review and comment for a period of 30 days beginning April 14, 2021. This notice is to extend the public review period to May 14, 2021. The City held a public scoping meeting on April 6, 2021 to inform interested parties about the proposed project and provide agencies and the public with an opportunity to submit comments on the scope and content of the EIR. The City will hold **a second public scoping meeting on April 28, 2021.** As a result of the current COVID-19 restrictions in place on in-person gatherings, City of Fresno public meetings will be conducted electronically only. The meeting time, web link, and call-in information is as follows:

Web link: https://zoom.us/j/98373607907
Call-in Information: (669) 900-9128
Webinar ID: 983 7360 7907

Meeting Date: April 28, 2021

Meeting Time: 6:00 to 8:00 PM

Due to COVID-19 restrictions, copies of the NOP may be reviewed at the following locations:

- Online at: https://www.fresno.gov/cityclerk/notices-publications/ or
- www.fresno.gov/SCSP

For information on additional viewing methods, contact Executive Assistant Cherie Vick (contact information below).

Your views and comments on how the project may affect the environment are welcomed. Please contact Jennifer Clark if you have any questions about the environmental review process for the proposed project.

Project Location

The approximately 5,629-acre planning area, located in the southern portion of the City, is largely comprised of land within the City limits. However, as shown in Figures 1 and 2, the planning area also includes land within the City's Sphere of Influence (SOI) to the north, east, and west.

PROJECT DESCRIPTION

The City of Fresno is preparing the South Central Specific Plan to maximize economic benefit and job growth for residents, while reducing impacts on the environment and improving quality of life. The proposed project would designate land uses, establish a planning framework, and development standards to facilitate and guide future development within the planning area through the year 2040.

The EIR will evaluate potential impacts associated with development of a preferred proposed Specific Plan as well as at two additional development alternatives that may occur within the planning area through the year 2040. The specific plan proposes revised land use and zoning designations, specific design guidelines, and process improvements. See Table 1 for draft estimated acreages for the approximately 5,000 acres of land use designations proposed for the Specific Plan and plan alternatives. These acreages do not include existing infrastructure such as roadways included in the 5,629-acre Specific Plan boundary. Future

development would be required to comply with the proposed specific plan land use designations, development standards, and policy framework. Following adoption of the South Central Specific Plan, subsequent projects that are consistent with the Specific Plan could undergo a streamlined CEQA environmental review and approval process that may consist of completing a conformance checklist demonstrating consistency with the Specific Plan.

Table 1: Proposed Specific Plan and Plan Alternatives Estimated Land Use Designation Acreages

Land Use	Existing General Plan Acres (percent)	Proposed Plan Acres (percent)	Alternative 1[a] Acres (percent)	Alternative 2[b] Acres (percent)
Business Park	144 (3%)	655 (13%)	581 (12%)	40 (1%)
General Commercial	10 (<1%)	48 (1%)	2,014 (42%)	13 (<1%)
Regional Business Park	351 (7%)	334 (7%)	247 (5%)	334 (7%)
Heavy Industrial	3,470 (72%)	2,651 (53%)	22 (<1%)	3,043 (63%)
Light Industrial	614 (13%)	714 (14%)	1,495 (31%)	1,076 (22%)
Neighborhood Mixed Use	0.25 (0%)	0.25 (<1%)	0.25 (<1%)	0.25 (<1%)
Open Space - Ponding Basin	157 (3%)	157 (3%)	157 (3%)	157 (3%)
Open Space - Neighborhood Park	2 (0%)	2 (<1%)	2 (<1%)	2 (<1%)
Public	41 (1%)	135 (3%)	29 (1%)	78 (2%)
Rail	32 (1%)	32 (1%)	32 (1%)	32 (1%)
Residential	30 (1%)	270 (5%)	273 (6%)	76 (2%)
Other	NA	0.001 (<1%)	0.001 (<1%)	0.001 (<1%)
SCSP Boundary Change	146	NA	146	146
TOTAL	*4,852*	*4,997*	*4,852*	*4,852*
TOTAL (including SCSP Boundary Change)	*4,997*	*4,997*	*4,997*	*4,997*

* Rounded to the nearest acre. Figures may not sum due to rounding.

NA Not applicable

[a] Alternative 1 tentatively labeled Community Proposed Alternative

[b] Alternative 2 tentatively labeled Business Proposed Alternative

RESPONSIBLE AGENCIES

For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency that have discretionary approval power over the project (CEQA Guidelines Section 15381). Discretionary approval may include such actions as issuance of a permit, authorization, or easement needed to complete some aspect of the proposed project. Responsible agencies may include, but are not limited to:

- California Department of Transportation (Caltrans),
- California State Water Resources Control Board (SWRCB),
- California Department of Fish and Wildlife (CDFW),

- Central Valley Regional Water Quality Control Board (CVRWQCB),
- County of Fresno,
- Fresno Local Agency Formation Commission (LAFCo), and
- San Joaquin Valley Air Pollution Control District (SJVAPCD).

AREAS OF POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will analyze the significant environmental effects associated with adoption and implementation of the proposed project. Specific areas of analysis will include the following topics based on Appendix G of the State CEQA Guidelines:

- Aesthetics
- Agricultural and Forestry Services
- Ai Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Cumulative Impacts

The EIR will also include a discussion of environmental justice issues, and identify and evaluate a range of reasonable alternatives to the proposed project, including a No Project Alternative.

SUBMITTING COMMENTS

Comments and suggestions as to the appropriate scope of analysis in the EIR are invited from all interested parties. Written comments or questions concerning the EIR for the proposed project should be directed to the City's environmental project manager at the following address by **5:00 p.m. on May 14, 2021**. Please include the commenter's full name and address.

Jennifer Clark , Planning Director
c/o Cherie Vick, Executive Assistant
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003
Cherie.vick@fresno.gov

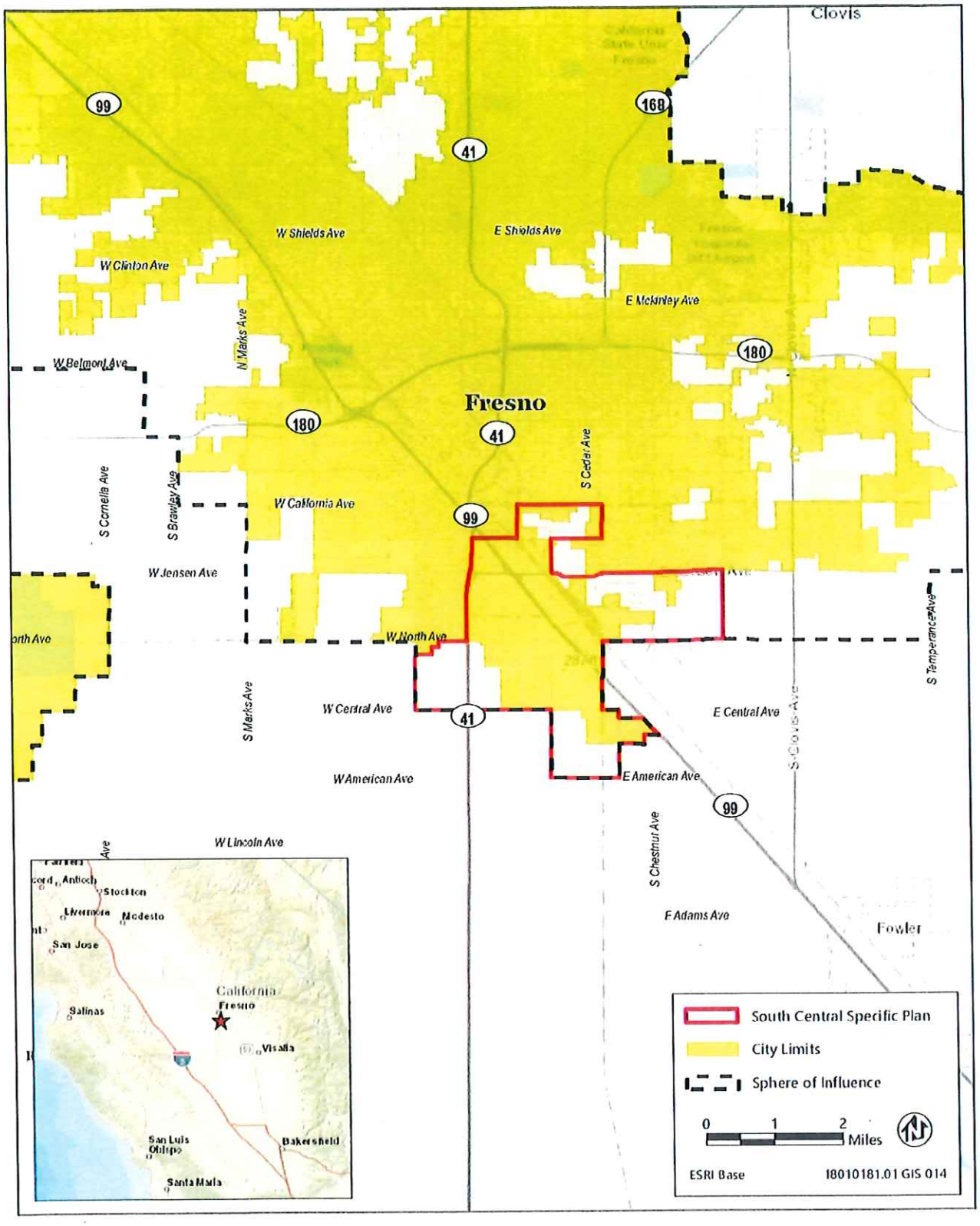


Figure 1 Regional Location

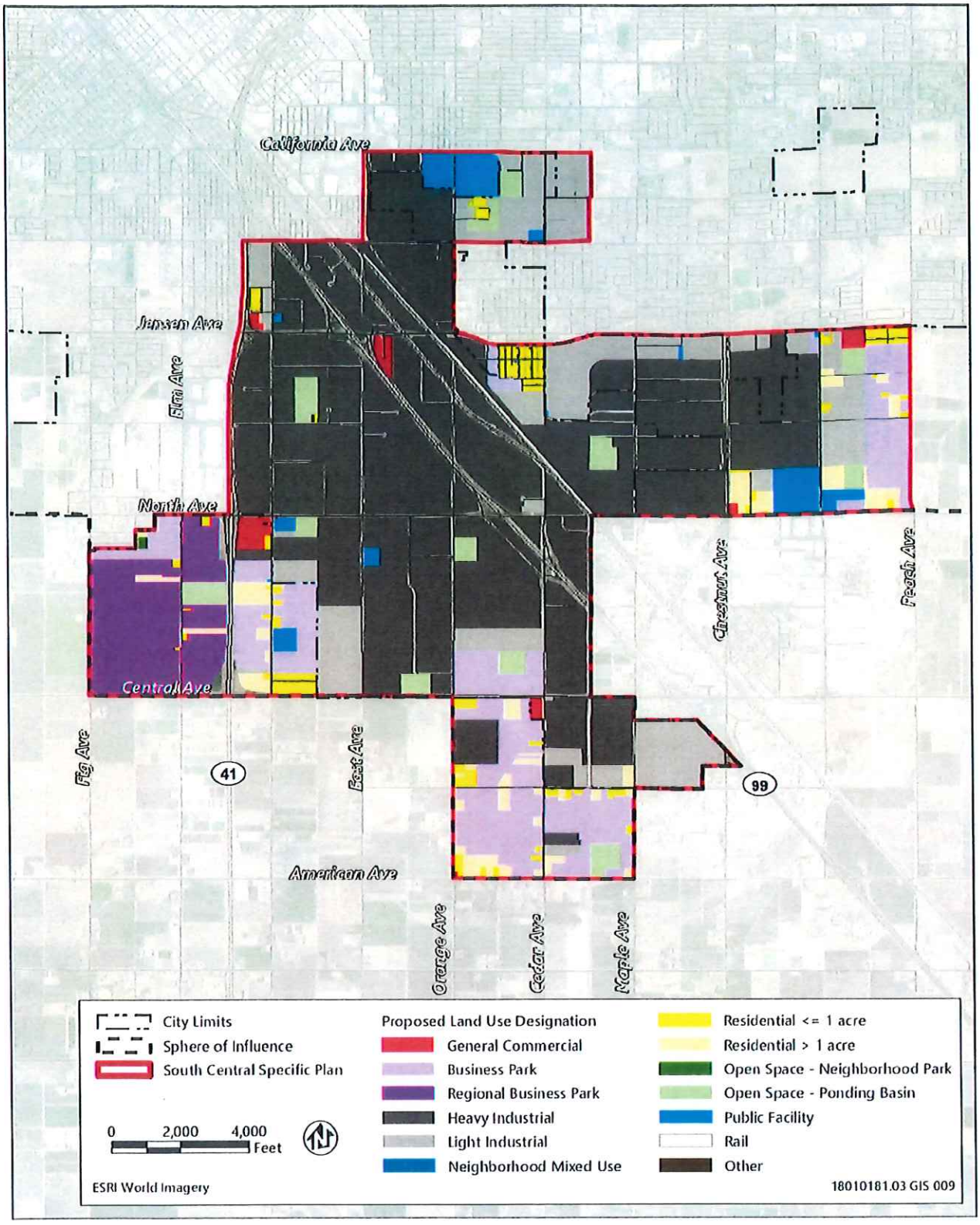


Figure 2 Planning Area

YOUR MOST VALUABLE RESOURCE - WATER

OFFICE OF
FRESNO IRRIGATION DISTRICT

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

July 26, 2019

Jennifer Clark
Development and Resource Management Department
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721

RE: City of Fresno South Industrial Priority Area Specific Plan Notice of Preparation
FID Facilities: Various

Dear Ms. Clark:

The Fresno Irrigation District (FID) has reviewed the South Industrial Priority Area Specific Plan Notice of Preparation for the City of Fresno (Project). The Planning Area is approximately 6,150 acres, located in the southern portion of the City. The Planning Area includes lands within the City of Fresno's sphere of influence (SOI), and as an option, outside the City's SOI. Your proposed project is a significant development and requires thorough and careful consideration of potential impacts. FID has the following comments:

Impacted Facilities

1. FID has many canals within the Planning Area as shown on the attached FID exhibit map. The facilities include: Braly No. 14, Washington Colony No. 15, Oleander N. Br. No. 17, Washington Colony N, Br, No. 20, Washington Colony S. Br. No. 22, Central No. 23, Fresno Colony No. 24, Viau No. 25, North Central No. 26, American Colony No. 27, Wilson No. 230, Storey No. 237, Benefield No. 239, and Wilder No. 289. Most, if not all of these facilities precede the City, development, and/or roads. FID's canals range from smaller diameter pipelines to large open canals. In most cases, the existing facilities will need to be upgraded to meet current urban standards or relocated by the developer to accommodate new urban developments and provide for public safety which will require new pipelines and new exclusive easements. FID will impose the same conditions on future projects as it would with any other project located within the common boundary of the City of Fresno and FID including, but not limited to requirements from FID specified exclusive easements, access points, and drive

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

approaches at all road crossings. Additionally, FID will also require all impacted open channel drive banks, to be built out to FID specified widths, heights, and overlaid with all-weather road. FID will require that it review and approve all maps and plans which impact FID canals and easements.

a. Small/Medium Canal Crossings – The majority of the proposed Planning Area will impact existing pipelines and small open channel canals. FID will require all open channels and existing pipelines impacted by the project area development be upgraded to meet FID's then current standards for urban, rural, industrial areas. The majority of FID's facilities that lie within the proposed Planning Area do not meet FID's urban specifications, including road or highway crossings. The majority of the existing pipelines are monolithic cast-in-place concrete pipe (CIPCP), low head/thin wall PVC, and non-reinforced mortar jointed concrete pipeline. These pipelines were designed for a rural environment and must be replaced as development occurs.
b. Large Canal Crossing – There are large canals called the Washington Colony No. 15 and the Central Canal No. 23 that will more than likely be too large to be contained within a pipeline. Development impacts to this facility shall require designs that protect the canal's integrity for an urban setting including the need for access and full right-of-way widths for FID's operations and maintenance needs.

2. FID's facilities that are within the Planning Area carry irrigation water for FID users, recharge water for the City of Fresno, and storm and flood waters during the winter months. In addition to FID's facilities, private facilities also traverse the Planning Area.

Water Supply Impact

1. The Planning Area is located both outside of and within Growth Areas 1 and 2 of the Cooperative Water Utilization and Conveyance Agreement between the City of Fresno and FID. Should any developments receive water through any Extraterritorial Agreements, FID requires it review and approve all Agreements. Areas that are outside of the said Conveyance Agreement or within Growth Area 2 are not entitled to waters from FID.

2. California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA). The act requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and adopt locally-based management plans. FID and the City of Fresno are members of the North Kings Groundwater Sustainability Agency which will manage the groundwater basin within the FID service area. This area is heavily reliant on groundwater pumping and SGMA will impact all users of

groundwater and those who rely on it. The City of Fresno should consider the potential impacts of the development on the City's ability to comply with requirements of SGMA.

3. The proposed developments may negatively impact local groundwater supplies. A large portion of the planned area is currently being used for agricultural purposes. Under current circumstances the project area is experiencing a modest, but continuing groundwater overdraft. Should the proposed developments result in a greater consumption of groundwater, this deficit will increase. FID suggests the City of Fresno require balancing anticipated groundwater use with sufficient recharge of imported surface water to preclude increasing the area's existing groundwater overdraft and require the use of reclaimed water or other conservation methods.

4. It should be noted that without the use of surface water, continued dependence on solely a groundwater supply will do nothing to reverse or correct the existing overdraft of the groundwater supply beneath the City of Fresno and FID service area. As additional development within the Planning Area will "harden" or make firmer the need for water, the long-term correction of the groundwater overdraft should be considered as any requirements for developments.

Thank you for providing to us the Notice of Preparation for the City of Fresno's South Industrial Priority Area Specific Plan Notice of Preparation 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. FID reserves the right to provide additional comments when more detailed information becomes available. If you have any questions please feel free to contact Jeremy Landrith at (559) 233-7161 extension 7407 or jlandrith@fresnoirrigation.com.

Sincerely,

Laurence Kimura, P.E.
Chief Engineer

Attachments

Notice of Preparation

Date: July 8, 2019

To: Responsible Agencies, Interested Parties, and Organizations

Subject: Notice of Preparation of an Environmental Impact Report for the South Industrial Priority Area Specific Plan project, Fresno, California

Lead Agency: City of Fresno

Contact:
Jennifer Clark, Director
c/o Marty Sorge-Jauss, Executive Assistant
Development and Resource Management
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003
Jennifer.Clark@fresno.gov
Marty.Sorge-Jauss@fresno.gov

Comment Period: July 8, 2019 to August 6, 2019

PURPOSE OF NOTICE

The City of Fresno is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the proposed South Industrial Priority Area Specific Plan project (proposed project), located in the City of Fresno. Pursuant to provisions of the California Environmental Quality Act (CEQA), the City has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

The EIR will provide an evaluation of potential environmental impacts associated with the proposed project. A brief project description, location, and potential environmental issue areas that may be affected by development of the proposed project are described below. The EIR will evaluate the potentially significant environmental impacts of the proposed project, on both a direct and cumulative basis, identify mitigation measures that may be feasible to lessen or avoid such impacts, and identify alternatives to the proposed project.

PUBLIC REVIEW PERIOD

This NOP is being circulated for public review and comment for a period of 30 days beginning July 8, 2019. The City will hold a public scoping meeting to inform interested parties about the proposed project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location is as follows:

City of Fresno, City Council Chambers
2600 Fresno Street
Fresno, CA 93721
Monday, July 15, 2019
Time: 5:30 to 7:30 PM

Copies of the NOP may be reviewed at the following locations:

- Fresno County Public Library during library hours;
- City of Fresno, 2600 Fresno St, Room 3065 between 7:00 a.m. and 6:00 p.m.; or
- Online at: https://www.fresno.gov/cityclerk/notices-publications/

Your views and comments on how the project may affect the environment are welcomed. Please contact Jennifer Clark if you have any questions about the environmental review process for the proposed project.

PROJECT LOCATION

The approximately 6,150-acre planning area, located in the southern portion of the City, is largely comprised of land within the City limits. However, as shown in Figures 1 and 2, the planning area also includes land within the City's Sphere of Influence (SOI) to the north, east, and west, and (as an option) land outside of the City's SOI to the south. Pursuant to General Plan Policy LU-1-g, the City's SOI boundary can be expanded to include land located proximate to and south of the SOI boundary between State Route 41 and State Route 99 for the purposes of siting a maintenance yard for the California High Speed Train project and related industrial and employment priority areas.

PROJECT DESCRIPTION

The City of Fresno is preparing the South Industrial Priority Area Specific Plan to facilitate opportunities for economic growth, job creation, and promote development of underutilized lands within the planning area. The proposed project would establish a planning framework to facilitate and guide future development within the 6,150-acre planning area through the year 2040. The planning framework is comprised of previously adopted goals and policies from the following City planning documents:

- Roosevelt Community Plan (1992),
- City of Fresno General Plan (2014), and
- Southwest Fresno Specific Plan (2017).

As noted above, the EIR will evaluate potential impacts associated with development within the plan area, consistent with the proposed specific plan, that may occur within the planning area through the year 2040. No land use/zoning designation changes or specific development projects are currently proposed as part of this EIR. Future development would be required to comply with the proposed specific plan, as well as existing General Plan Land Use designations and Zoning Districts within the planning area.

RESPONSIBLE AGENCIES

For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency that have discretionary approval power over the project (CEQA Guidelines Section 15381). Discretionary approval may include such actions as issuance of a permit, authorization, or easement needed to complete some aspect of the proposed project. Responsible agencies may include, but are not limited to:

- California Department of Transportation (Caltrans),
- California State Water Resources Control Board (SWRCB),
- California Department of Fish and Wildlife (CDFW),
- Central Valley Regional Water Quality Control Board (CVRWQCB),
- County of Fresno,
- Fresno Local Agency Formation Commission (LAFCo), and
- San Joaquin Valley Air Pollution Control District (SJVAPCD).

AREAS OF POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will analyze the significant environmental effects associated with adoption and implementation of the proposed project. Specific areas of analysis will include the following topics based on Appendix G of the 2019 State CEQA Guidelines:

- Aesthetics
- Agricultural and Forestry Services
- Ai Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Cumulative Impacts

The EIR will also include a discussion of environmental justice issues, and identify and evaluate a range of reasonable alternatives to the proposed project.

SUBMITTING COMMENTS

Comments and suggestions as to the appropriate scope of analysis in the EIR are invited from all interested parties. Written comments or questions concerning the EIR for the proposed project should be directed to the City's environmental project manager at the following address by 5:00 p.m. on August 6, 2019. Please include the commenter's full name and address.

Jennifer Clark, Planning Director
c/o Marty-Sorge-Jauss, Executive Assistant
Development and Resource Management
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003
SIPA@fresno.gov

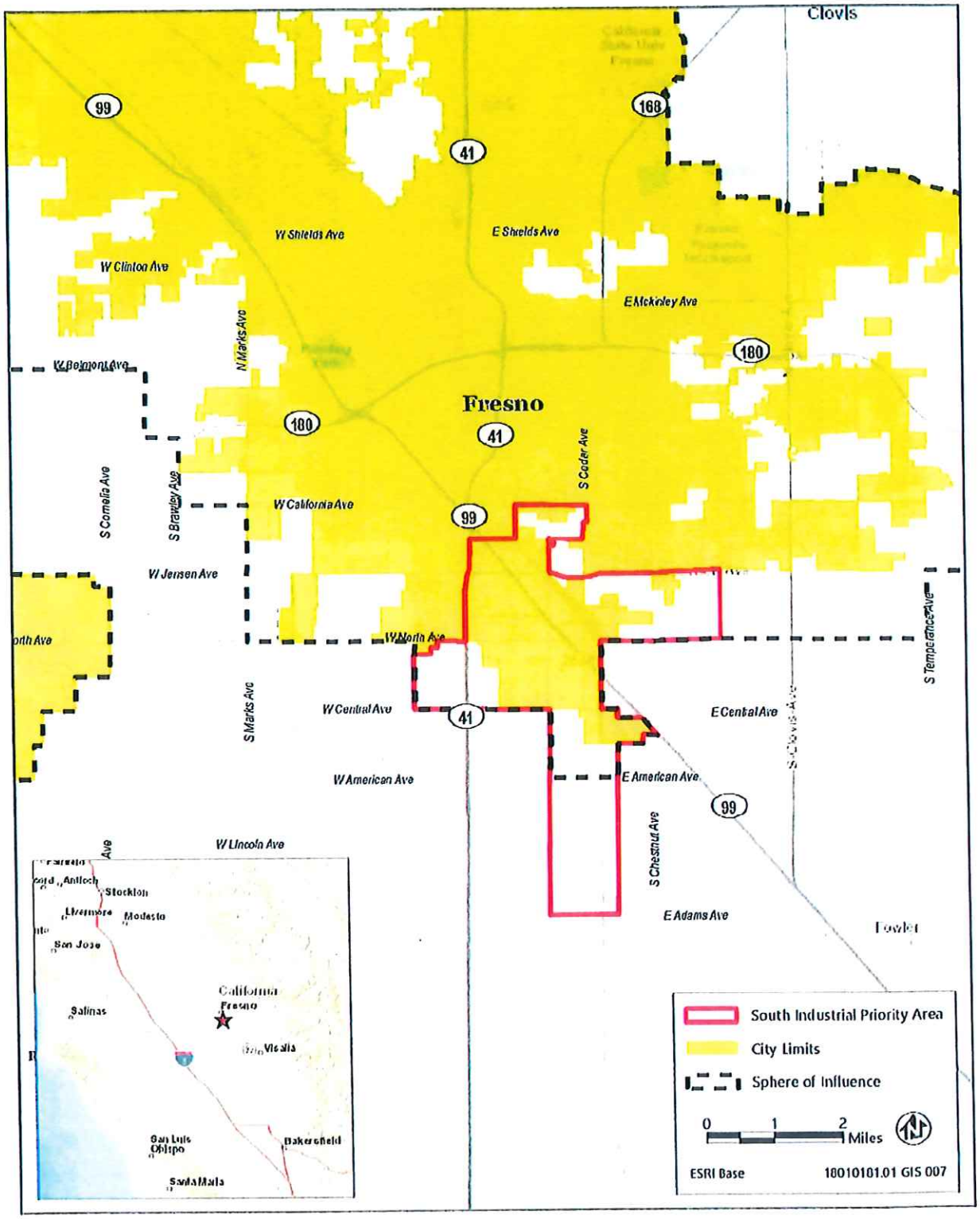


Figure 1. Regional Location

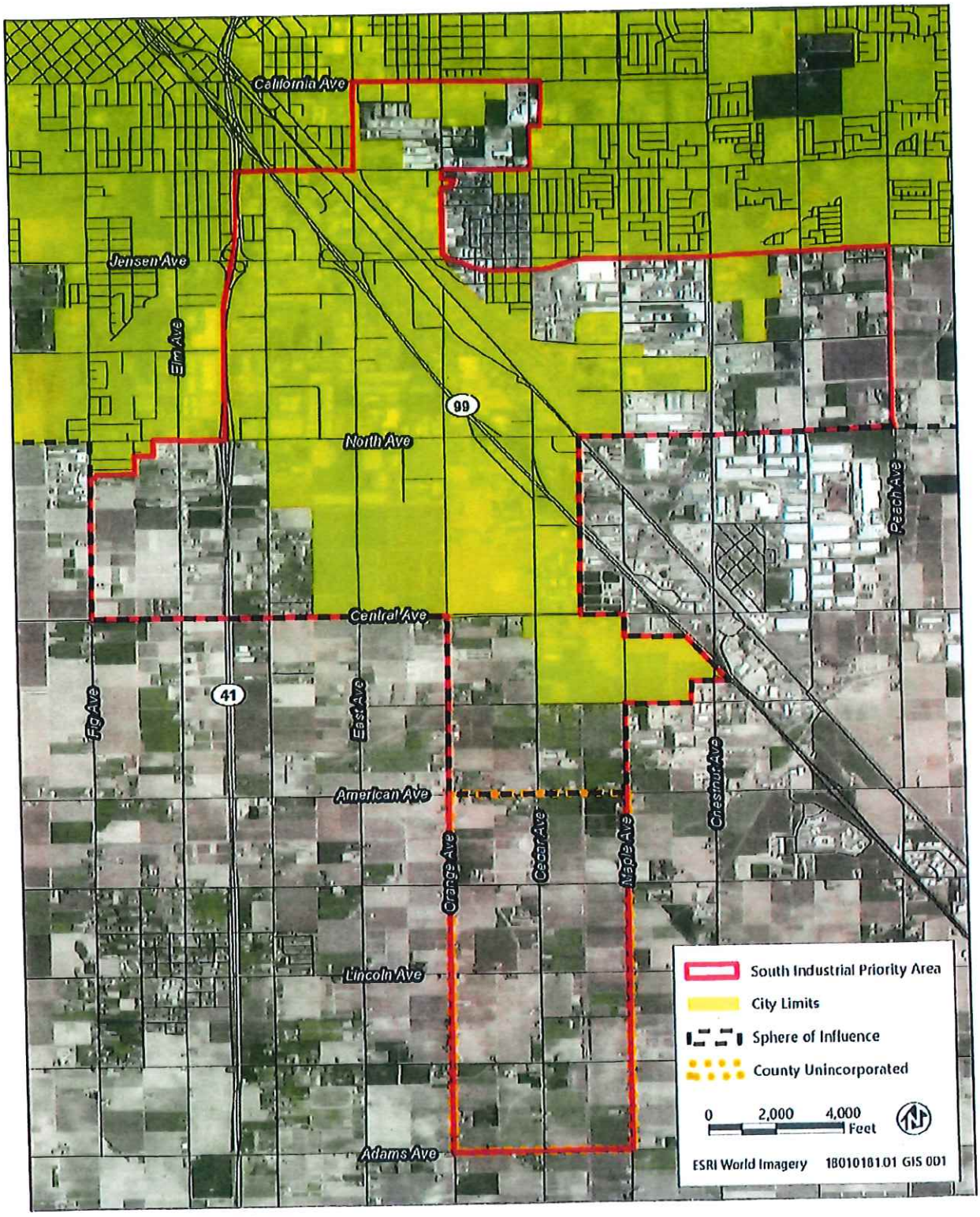


Figure 2 **Planning Area**

Notice of Preparation

Date: July 8, 2019

To: Responsible Agencies, Interested Parties, and Organizations

Subject: Notice of Preparation of an Environmental Impact Report for the South Industrial Priority Area Specific Plan project, Fresno, California

Lead Agency: City of Fresno

Contact:
Jennifer Clark, Director
c/o Marty Sorge-Jauss, Executive Assistant
Development and Resource Management
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003
Jennifer.Clark@fresno.gov
Marty.Sorge-Jauss@fresno.gov

Comment Period: July 8, 2019 to August 6, 2019

PURPOSE OF NOTICE

The City of Fresno is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the proposed South Industrial Priority Area Specific Plan project (proposed project), located in the City of Fresno. Pursuant to provisions of the California Environmental Quality Act (CEQA), the City has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and the potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

The EIR will provide an evaluation of potential environmental impacts associated with the proposed project. A brief project description, location, and potential environmental issue areas that may be affected by development of the proposed project are described below. The EIR will evaluate the potentially significant environmental impacts of the proposed project, on both a direct and cumulative basis, identify mitigation measures that may be feasible to lessen or avoid such impacts, and identify alternatives to the proposed project.

PUBLIC REVIEW PERIOD

This NOP is being circulated for public review and comment for a period of 30 days beginning July 8, 2019. The City will hold a public scoping meeting to inform interested parties about the proposed project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location is as follows:

City of Fresno, City Council Chambers
2600 Fresno Street
Fresno, CA 93721
Monday, July 15, 2019
Time: 5:30 to 7:30 PM

AREAS OF POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will analyze the significant environmental effects associated with adoption and implementation of the proposed project. Specific areas of analysis will include the following topics based on Appendix G of the 2019 State CEQA Guidelines:

- Aesthetics
- Agricultural and Forestry Services
- Ai Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Cumulative Impacts

The EIR will also include a discussion of environmental justice issues, and identify and evaluate a range of reasonable alternatives to the proposed project.

SUBMITTING COMMENTS

Comments and suggestions as to the appropriate scope of analysis in the EIR are invited from all interested parties. Written comments or questions concerning the EIR for the proposed project should be directed to the City's environmental project manager at the following address by 5:00 p.m. on August 6, 2019. Please include the commenter's full name and address.

Jennifer Clark, Planning Director
c/o Marty-Sorge-Jauss, Executive Assistant
Development and Resource Management
2600 Fresno Street, Room 3065
Fresno, CA 93721
(559) 621-8003
SIPA@fresno.gov

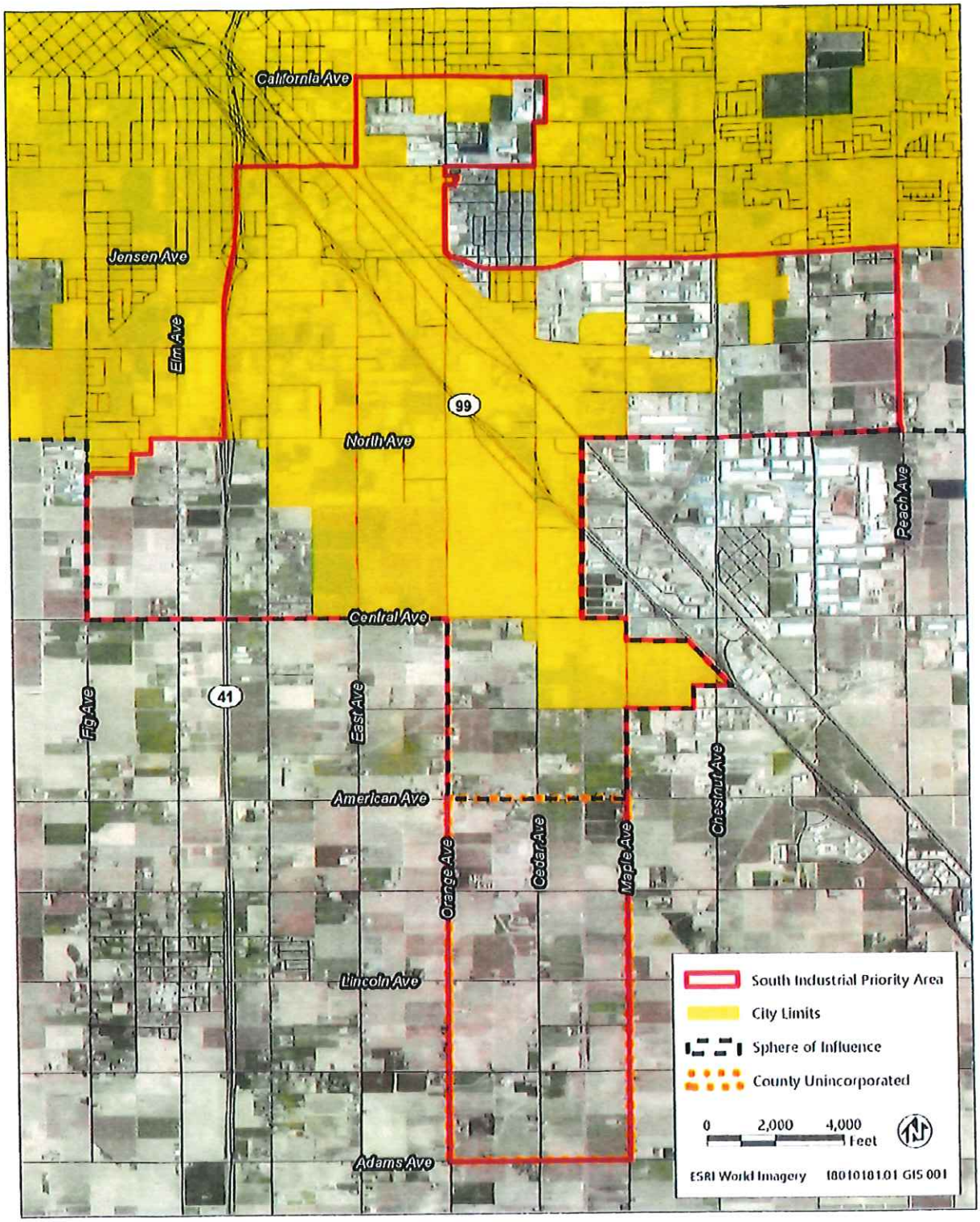


Figure 2 Planning Area

NOTICE OF TIME EXTENTION OF THE PUBLIC COMMENT PERIOD FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SOUTH CENTRAL SPECIFIC PLAN (SCH#2019079022)

On May 31, 2024, a Notice of Availability was given that the City of Fresno (City), as the Lead Agency, had completed a Draft Environmental Impact Report (EIR) for the South Central Specific Plan. The Draft EIR was distributed to public agencies and interested parties for public review pursuant to the California Environmental Quality Act (CEQA, Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) starting a 45-day public comment period set to conclude on July 15, 2024.

This notice is to announce that the public comment period has been extended by 15 days to July 30, 2024 to allow public agencies and interested parties a total of 60 days to review and comment on the Draft EIR. In re-noticing the Draft EIR, the City continues to provide online links to the documents as well as information on additional viewing methods.

PROJECT LOCATION

The Plan Area encompasses 5,567 acres located just south and southeast of Downtown Fresno. The Plan Area is generally located south of California Avenue, north of American Avenue, and between Fig and Peach Avenues. The area has a range of property types including industrial, warehouse, commercial, residential, religious, educational, and public.

PROJECT DESCRIPTION

The Plan Area currently supports nearly 19.6 million square feet of nonresidential development and approximately 400 residential units. The plan assumes that an additional 12 million square feet of nonresidential uses and 91 dwelling units would be constructed by 2040. Growth in the Plan Area would be primarily industrial, with smaller amounts of office and retail uses. Other land uses would be permitted in accordance with General Plan land use designations, but are not the focus of the SCSP.

A primary impetus for the SCSP is economic development and job growth. As discussed in the Draft EIR, more than 14,000 new jobs would be created by 2040 with anticipated development, primarily in the industrial sector, with lesser but still substantial growth in office and retail jobs.

Assumed Development for the Proposed Plan Compared to Existing Conditions

Land Use Designation	Existing (square footage)	Proposed Plan (square footage) by 2040
Retail	0	866,676
Office	10,912	578,790
Industrial	19,624,154	10,576,278
Total Non-residential	19,635,066[1]	12,021,744
Residential Units	400 dwelling units	91 dwelling units

Notes: [1] Existing development only reflects the employment land use categories within the Specific Plan Area. Source: Ascent 2023.

The SCSP proposes land use designation changes for certain areas, requiring a General Plan amendment and rezone of the same properties. The changes are proposed primarily to 1) reconcile land use designations with existing conditions, 2) to buffer sensitive uses (e.g., residential areas, Orange Center School) with less intensive uses (e.g., business park instead of industrial), and 3) to provide more opportunities for neighborhood-serving general commercial uses near residential areas. The SCSP would result in substantial reductions in acreage of Heavy Industrial land uses and a modest decrease in Regional Business Park, with corresponding increases in acreage of Business Park, Single-Family Residential, Public, Light Industrial, and General Commercial uses.

DOCUMENT AVAILABILITY

Addresses where a copy of the Draft EIR is available for review:

City of Fresno
Planning and Development Department
2600 Fresno Street, Third Floor, Rm 3043
Fresno, CA 93721

Fresno County Public Library
2420 Mariposa Street
Fresno, CA 93721

Mosqueda Branch Library
4670 E Butler Ave
Fresno, CA 93702

West Fresno Branch Library
188 E California
Fresno, CA 93706

The Draft EIR is also available on the City's website at:
https://www.fresno.gov/planning/plans-projects-under-review/#south-central-specific-plan-scsp

PUBLIC COMMENT PERIOD

The City of Fresno will receive public comments on the Draft EIR from **May 31, 2024** to **July 30, 2024**. Written comments should be received **no later than 5pm (PST) on July 30, 2024**. Please send your written comments to Sophia Pagoulatos and include your name, address, and phone number and/or email address so that we may contact you for clarification, if necessary. Comments may be delivered in person, by first class mail or email to:

File 310. “II1”, “II2”, “KK”,
“LL”, “AV”, “AW1”, “AW2”,
“AX”, “AY”, “AZ”, “BD”,
“CE”, “CQ”, “CU”
420.214

July 30, 2024

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

Dear Sophia,

Notice of Availability of a Draft Environmental Impact Report (DEIR) for the South Central Specific Plan

Drainage Areas “HH”, “II1”, “II2”, “KK”, “LL”, “AV”, “AW1”, “AW2”, “AX”, “AY”, “AZ”, “BD”, “CE”, “CQ”, and “CU”

The Fresno Metropolitan Flood Control District (District) has adopted storm drainage Master Plan systems for areas located within the South Central Specific Plan (Plan Area) shown on the attached Exhibit No. 1. These Master Plan systems are based on the previously adopted General and/or Specific Plan land uses.

There are approximately 375 acres within the Plan Area currently not located within a planned “drainage boundary” as shown on Exhibit No. 1. It is the District’s intention to work with the City of Fresno to provide Master Planned drainage area systems to serve this portion of the Plan Area.

As noted in the District’s prior letter dated August 6, 2019, in Master Plan areas where no drainage facilities have been constructed, the Master Plan can be revised to accommodate new land uses and pipe alignments within the Plan Area. For areas that have existing drainage facilities and propose changes to land uses that generate more runoff than originally planned, some type of mitigation to accommodate the increased flow such as parallel pipes and/or on-site retention may be required. The District has identified properties within the Plan Area that may require some form of mitigation as shown on the attached Exhibit No. 2. Proposed land uses can effect system size, the District shall be notified when changes are made to the proposed land uses.

Drainage fees shall be collected pursuant to the Drainage Fee Ordinance prior to approval of any final maps and/or issuance of building permits at the rates in effect at the time of such approval. Instances where the District's Master Plan facilities have been constructed and proposed density is reduced, drainage fees will be subject to the higher rate anticipated to be collected when the facilities were installed. Please contact the District for a final fee obligation prior to issuance of the construction permits within the Plan Area.

The City of Fresno, the District, the County of Fresno, the City of Clovis, and the California State University, Fresno are currently covered as Co-Permittees for Municipal Separate Storm Sewer System (MS4) discharges through National Pollutant Discharge Elimination System (NPDES) General Order No. R5-2016-0040 and NPDES Permit No. CAS0085324 (Storm Water Permit) effective May 17, 2018. The previous Storm Water Permit adopted on May 31, 2013 required the adoption of Stormwater Quality Management Program (SWQMP) that describes the Storm Water Permit implementation actions and Co-Permittee responsibilities. That SWQMP was approved by the Central Valley Regional Water Quality Control Board on April 17, 2015 and is effective until adoption of a new SWQMP, which is anticipated within the next two years.

It is the District's understanding that the City will adopt a Program EIR for the proposed South Central Specific Plan and that the Program EIR may be used when considering approval of future discretionary actions. The Storm Water Permit requires that Co-Permittees update their CEQA process to incorporate procedures for considering potential stormwater quality impacts when preparing and reviewing CEQA documents. This requirement is found on Provision D.14 of the 2013 Storm Water Permit and in Section 7: Planning and Land Development Program – PLD 3 – Update CEQA Process. The District has created a guidance document that will meet this Storm Water Permit requirement entitled *Guidance for Addressing Stormwater Quality for CEQA Review*, which has been attached. In an effort to streamline future CEQA processing and maintain compliance with the Storm Water Permit, the District recommends that all future CEQA review within the City of Fresno utilize the attached guidance document Exhibit "A".

The District offers the following comments specific to the review of the DEIR Plan Area (the individual pages are included, and the section or sentence has been highlighted for your reference):

1. Page 3-13, Figure 3-6 Proposed Land Use: Show existing ponding Basin "AV" and outline correct parcels for Basin "CE" located northwest of American and Maple Avenues.

2. Page 3-27, 3.6.5 Proposed Utilities: Correct "purpose" to read "act".

3. Page 3-36, 3.8 Subsequent Entitlements and Approvals: Correct "Municipal" to read "Metropolitan".

4. Page 4.10-7, Hydrology and Water Quality: Correct “Municipal” to read “Metropolitan”.

5. Page 4.10-23, Hydrology and Water Quality: Second paragraph, the District requests removal of LID measures related to parcels.

6. Page 4.14-9, Figure 4.14-4 Existing and Planned Parks and Ponding Basins: The District has acquired all ponding basins shown on this Figure. Re-label the District Basin “AV” shown as “Planned District ponding basin” along Fig Avenue as an existing District ponding basin. Outline correct parcels for Basin “CE” located northwest of American and Maple Avenues.

7. Page 4.16-14, Utilities and Service System Stormwater: “164” should be corrected to say “165”.

8. Page 6-10, Figure 6-1: While we understand basin designations may not be able to change for the current General Plan Land Use document, we wish to point out existing Basin “AV” needs to be added with future updates.

Following comments below are specific to the review of the South Central Specific Plan document (the individual pages are included and the section or sentence has been highlighted for your reference):

9. Page 106, Storm Water: Correct “purpose” to read “act".

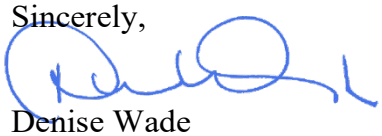
10. Page 112, Storm Water: Third paragraph, revise “ten” to “eleven” and eliminate remainder of sentence “and one planned ponding basin to be located on the east side of Fig Avenue, between North and Central Avenues”.

11. Page 112, Storm Water: Fourth paragraph, correct “480” to “372”, correct content to eliminate “outside of the Fresno city limits but” and eliminate “so”.

12. Page 113, Figure 7.5 - Existing and Planned Open Space: The District has acquired all ponding basins shown on this Figure. Re-label the District basin shown as “Planned District ponding basin” along Fig Avenue as an existing District ponding basin. Outline correct parcels for basin located northwest of American and Maple Avenues.

Thank you for the opportunity to comment. If you have any questions or require further information, please do not hesitate to contact me at (559) 456-3292.

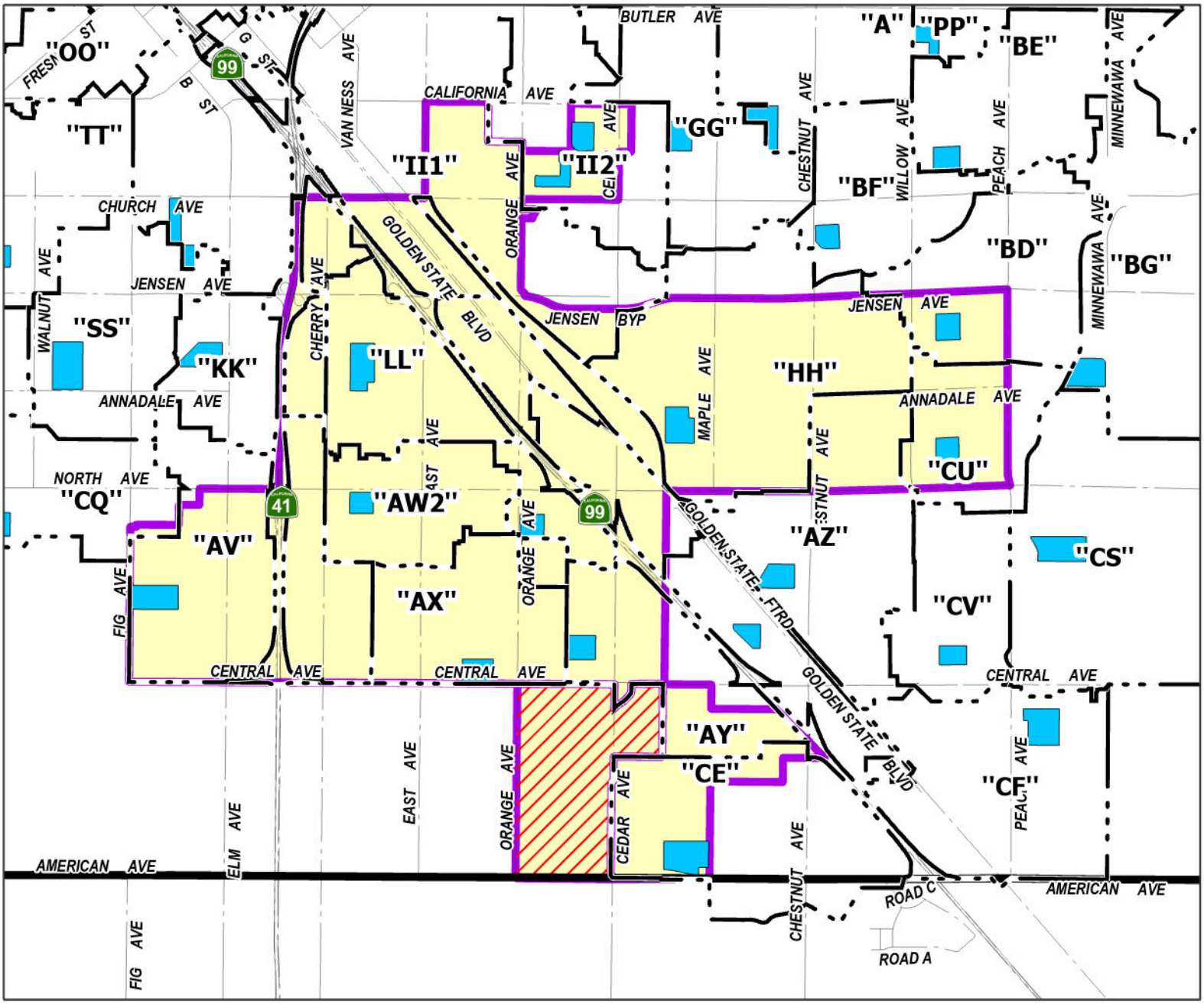
Sincerely,



Denise Wade
Master Plan Special Projects Manager

DW/lrl

Attachment



LEGEND

- DRAINAGE BOUNDARY
- DISTRICT BOUNDARY
- EXISTING BASIN
- SOUTH CENTRAL SPECIFIC PLAN AREA
- PLAN AREA NOT WITHIN A PLANNED DRAINAGE BOUNDARY

1"=4,000'

FMFCD Existing and Planned Facilities

Exhibit No. 1

FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

Prepared by: rebeccal
Date: 7/10/2024 11:14 AM
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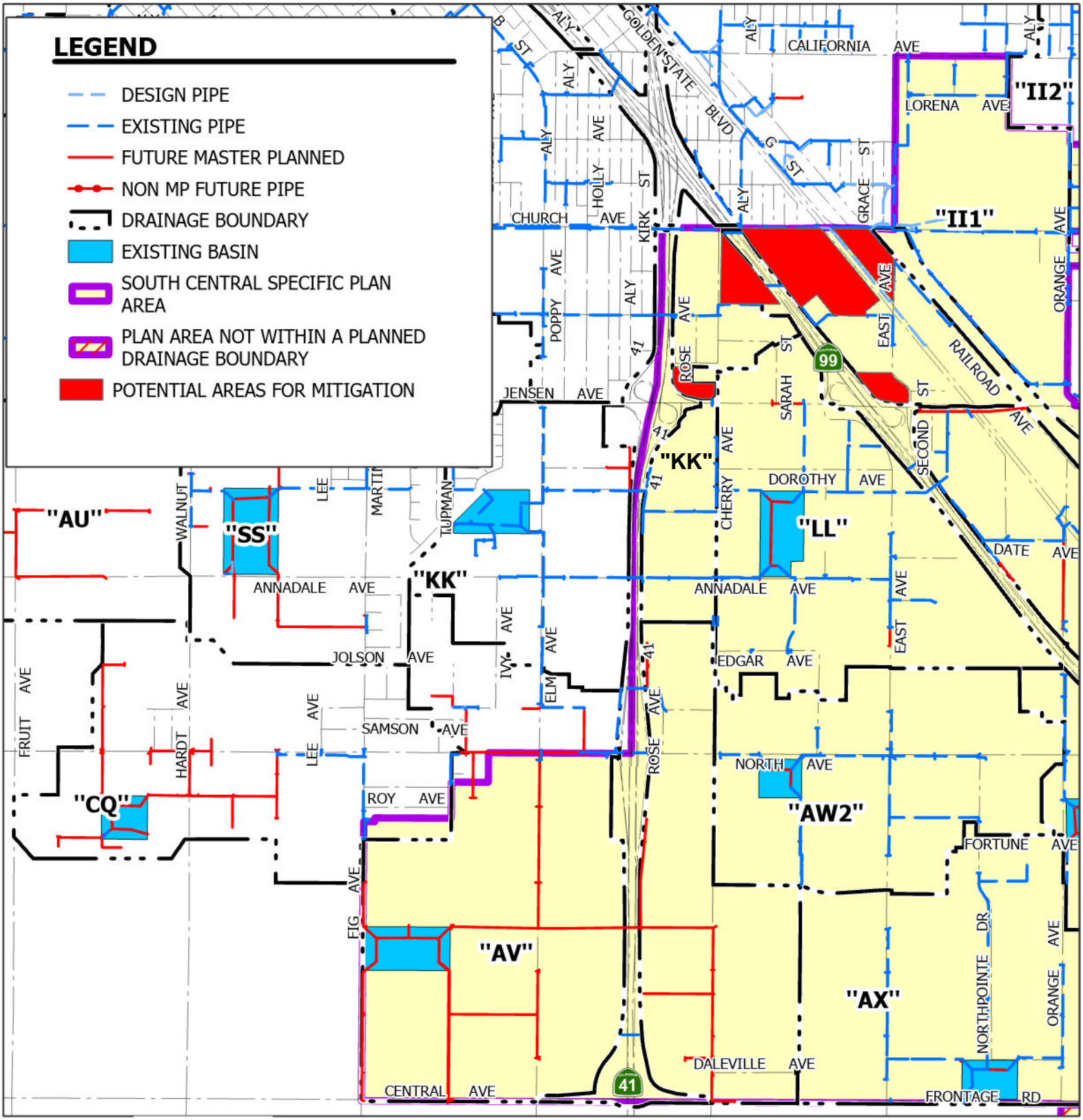

1"=2,000'

Exhibit No. 2
Page 1

FMFCD Existing and Planned Facilities

FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

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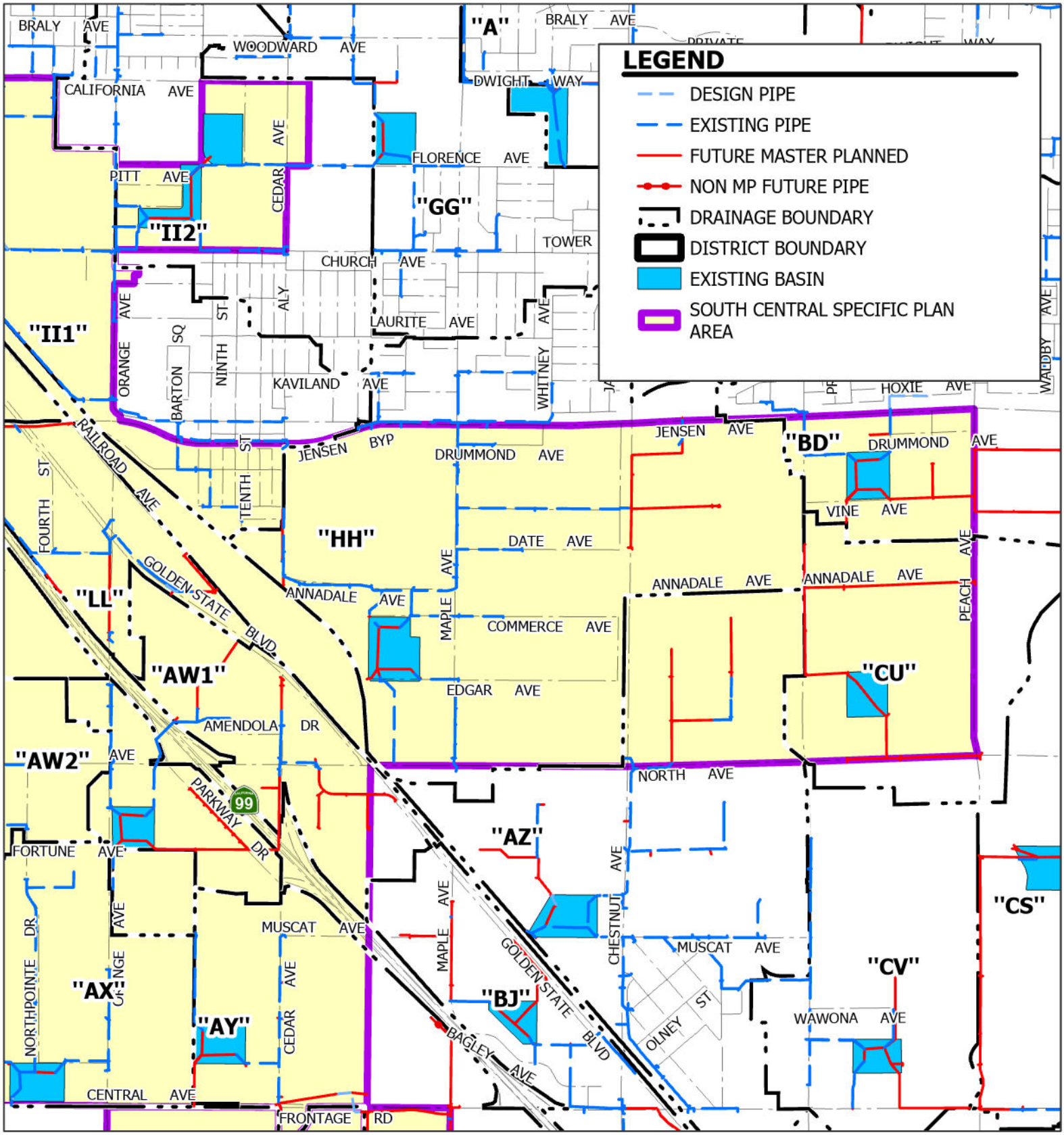

1"=2,000'

Exhibit No. 2
Page 2

FMFCD Existing and Planned Facilities

FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

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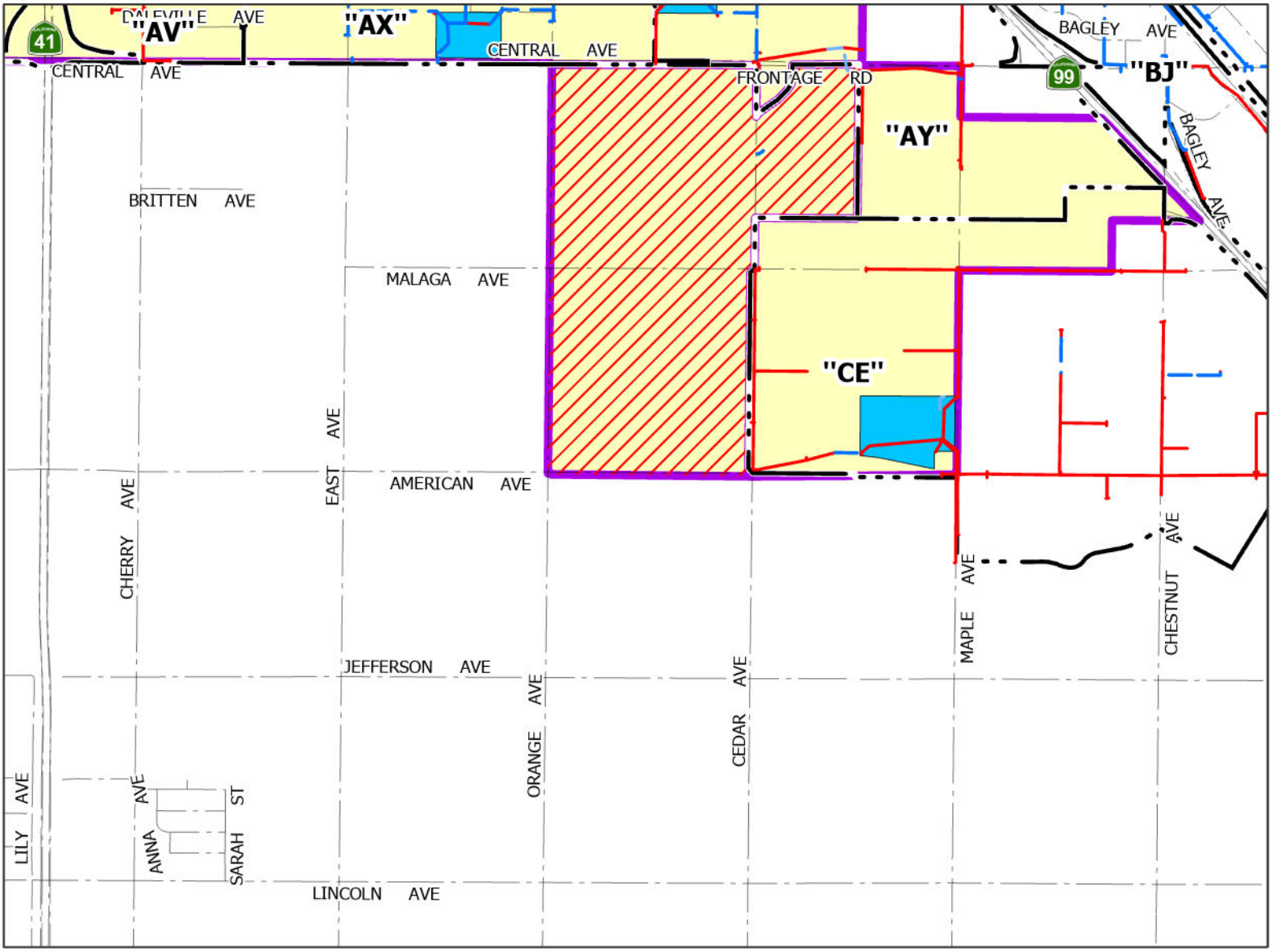

LEGEND

- DESIGN PIPE
- EXISTING PIPE
- FUTURE MASTER PLANNED
- NON MP FUTURE PIPE
- DRAINAGE BOUNDARY
- DISTRICT BOUNDARY
- EXISTING BASIN
- SOUTH CENTRAL SPECIFIC PLAN AREA
- PLAN AREA NOT WITHIN A PLANNED DRAINAGE BOUNDARY

N

1"=2,000'

FMFCD Existing and Planned Facilities

Exhibit No. 2
Page 3

FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

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Fresno Metropolitan Flood Control District

Guidance for Addressing Stormwater Quality for CEQA Review

Stormwater Checklist for CEQA Review

a. Potential impact of project construction on stormwater runoff.

Stormwater runoff from construction activities can have a significant impact on water quality. To build on sites with over one acre of disturbed land, property owners must obtain coverage under the California Construction General Permit for Discharges of Stormwater (CGP). The CGP is issued by the State Water Resources Control Board (SWRCB). The CGP requires sites that do not qualify for an erosivity waiver to create a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a site-specific plan that is designed to control the discharge of pollutants from the construction site to local storm drains and waterways.

b. Potential impact of project post-construction activity on stormwater runoff.

FMFCD operates the Regional Stormwater Mitigation System, which consists of facilities to handle stormwater runoff and non-stormwater discharges in the FMFCD service area. However, river discharging drainage areas and drainage areas without basin service are subject to FMFCD Policy: Providing for Compliance with Post-Development and Industrial Storm Water Pollution Control Requirements (Policy).

Development and redevelopment projects can result in discharge of pollutants to receiving waters. Pollutants of concern for a project site depend on the following factors:

- Project location;
- Land use and activities that have occurred on the project site in the past;
- Land use and activities that are likely to occur in the future; and
- Receiving water impairments.

As land use activities and site design practices evolve, particularly with increased incorporation of stormwater quality BMPs, characteristic stormwater runoff concentrations and pollutants of concern from various land use types are also likely to change.

Typical Pollutants of Concern and Sources for Post-Development Areas

Pollutant	Potential Sources
Sediment (total suspended solids and turbidity), trash and debris (gross solids and floatables)	Streets, landscaped areas, driveways, roads, construction activities, atmospheric deposition, soil erosion (channels and slopes)

Pesticides and herbicides	Residential lawns and gardens, roadsides, utility right-of-ways, commercial and industrial landscaped areas, soil wash-off
Organic materials/oxygen demanding substances	Residential laws and gardens, commercial landscaping, animal waste
Metals	Automobiles, bridges, atmospheric deposition, industrial areas, soil erosion, metal surfaces, combustion processes
Oil and grease, organics associated with petroleum	Roads, driveways, parking lots, vehicle maintenance areas, gas stations, illicit dumping to storm drains, automobile emissions, and fats, oils, and grease from restaurants
Bacteria and viruses	Lawns, roads, leaking sanitary sewer lines, sanitary sewer cross-connections, animal waste (domestic and wild), septic systems, homeless encampments, sediments/biofilms in storm drain system
Nutrients	Landscape fertilizers, atmospheric deposition, automobile exhaust, soil erosion, animal waste, detergents

Source: Adapted from USEPA, 1999 (Preliminary Data Summary of Urban Storm Water BMPs)

FMFCD's Post-Development Standards Technical Manual provides guidance for implementing stormwater quality Best Management Practices (BMPs) for drainage areas subject to the Policy, with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The Post-Development Standards Technical Manual addresses the following objectives and goals:

- Minimize impervious surfaces and directly connect impervious surfaces in areas of new development and redevelopment, and where feasible, to maximize on-site infiltration of stormwater runoff;
- Implement pollution prevention methods supplemented by pollutant source controls and treatment, and where practical, use strategies that control the sources of pollutants or constituents (i.e., where water initially meets the ground) to minimize the transport of runoff and pollutants offsite and into MS4s;
- Preserve, and where possible create or restore, areas that provide important water quality benefits, such as riparian corridors, wetlands, or buffer zones
- Limit disturbances of natural water bodies and natural drainage systems by development, including roads, highways, and bridges;
- Identify and avoid development in areas that are particularly susceptible to erosion and sediment loss or establish guidance that protects areas from erosion and sediment loss;
- Implement source and structural controls as necessary and appropriate to protect downstream receiving water quality from increased pollutant loadings and flows (hydromodification concepts) from new development and significant redevelopment;

- Control the post-development peak stormwater runoff discharge rates and velocities to maintain or reduce pre-development downstream erosion and to protect downstream habitat; and
- Consider integration of Low Impact Development (LID) principles into project design.

The Post-Development Standards Technical Manual describes the stormwater management requirements for Priority Projects, which are identified as meeting one or more of the following and discharge to the San Joaquin River or do not have basin service:

- Home subdivisions of 10 housing units or more;
- Commercial developments greater than 100,000 square feet;
- Automotive repair shops;
- Restaurants;
- Parking lots 5,000 square feet or greater with 25 or more parking spaces and potentially exposed to urban runoff;
- Streets and roads;
- Retail gasoline outlets (RGOs); and
- Significant redevelopment projects, which are developments that result in creation or addition of at least 5,000 square feet of impervious surface on an already developed site. Significant redevelopment includes, but is not limited to, expansion of a building footprint or addition or replacement of a structure, structural developing including an increase in gross floor area and/or exterior construction or remodeling, replacement of impervious surface that is not part of a routine maintenance activity, and land disturbing activities related with structural or impervious surfaces. Where significant redevelopment results in an increase of less than 50 percent of the impervious surfaces of a previously existing development and the existing development was not subject to Post-Construction Standards, only the proposed alteration must meet the requirements of the Post-Development Standards Technical Manual.

All Priority Projects must mitigate the Stormwater Quality Design Volume (SWQDV) or Stormwater Quality Design Flow (SWQDF) through LID- or treatment-based stormwater quality BMPs or a combination thereof.

For new development or significant redevelopment projects for restaurants with less than 5,000 square feet, the project applicant must meet all the requirements of the Post-Development Standards Technical Manual except for mitigating the SWQDV or SWQDF and implementing stormwater quality BMPs.

The Post-Development Standards Technical Manual can be found on FMFCD's website here:

http://www.fresnofloodcontrol.org/wp-content/uploads/2014/11/Post-Development-Standards-Technical-Manual.pdf

c. Potential for discharge of stormwater from areas from material storage, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas.

Development projects may create potential impacts to stormwater from non-stormwater discharge from areas with material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work area.

Some materials, such as those containing heavy metals or toxic compounds, are of more concern than other materials. Toxic and hazardous materials must be prevented from coming in contact with stormwater runoff. Non-toxic or non-hazardous materials, such as debris and sediment, can also have significant impacts on receiving waters. Contact between non-toxic or non-hazardous materials and stormwater runoff should be limited, and such materials prevented from being discharged with stormwater runoff. To help mitigate these potential impacts, BMPs should be included to prevent discharges from leaving the property.

Refer to FMFCD Post-Development Standards Technical Manual for more information or go to http://water.epa.gov/polwaste/nps/urban.cfm.

d. Potential for discharge of stormwater to impact the beneficial uses of the receiving waters or areas that provide water quality benefits.

Identify receiving waters and describe activities that may impact the beneficial uses of the receiving waters or that project water quality benefits. Project that can impact beneficial uses or receiving waters may be mitigated by implementation of the FMFCD Post-Development Standards Technical Manual.

e. Potential for the discharge of stormwater to cause significant harm on the biological integrity of the water ways and water bodies.

Conservation of natural areas, soils, and vegetation helps to retain numerous functions of pre-development hydrology, including rainfall interception, infiltration, and evapotranspiration. Each project site possesses unique topographic, hydrologic, and vegetative features, some of which are more suitable for development than others. Sensitive areas, such as streams and their buffers, floodplains, wetlands, steep slopes, and highly-permeable soils, should be protected and/or restored. Slopes can be a major source of sediment and should be properly protected and stabilized. Locating development in less sensitive areas of a project site and conserving naturally vegetated areas can minimize environmental impacts from stormwater runoff.

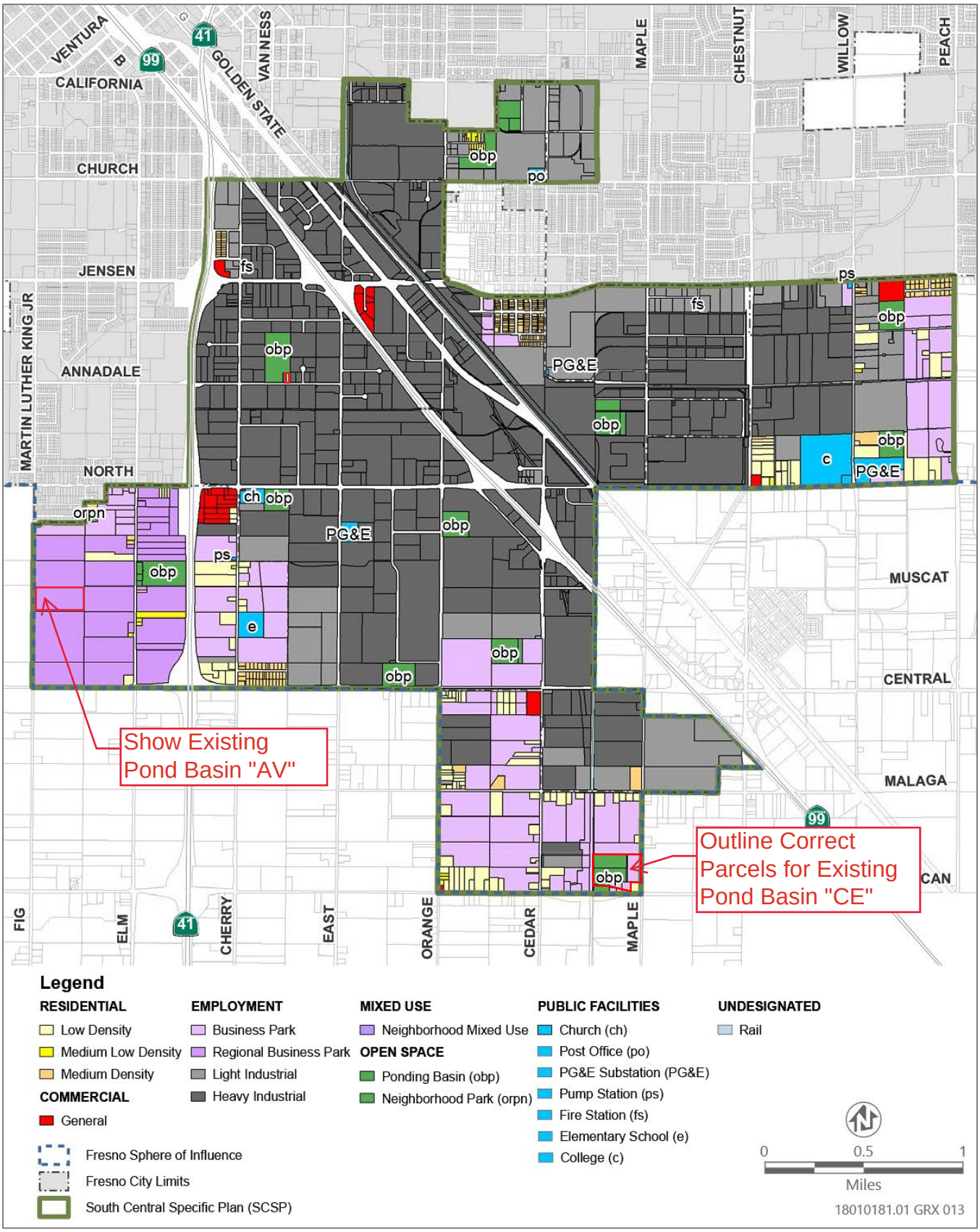
The evaluation of a project’s effect on sensitive natural communities should encompass aquatic and wetland habitats. Consider “aquatic and wetland habitat” as examples of sensitive habitat.

f. Potential for significant changes in the flow velocity or volume of stormwater runoff that can cause environmental harm.

The evaluation of a project's effect on drainage patterns should refer to the FMFCD's Storm Drainage and Flood Control Master Plan and have their project reviewed by FMFCD to assess the significance of altering existing drainage patterns and to develop any mitigation measures in addition to our stormwater mitigation system. The evaluation should also consider any potential for streambed or bank erosion downstream from the project.

g. Potential for significant increases in erosion of the project site or surrounding areas.

The evaluation of a project's effect on drainage patterns should refer to the FMFCD's Storm Drainage and Flood Control Master Plan and have their project reviewed by FMFCD to assess the significance of altering existing drainage patterns and to develop any mitigation measures in addition to our stormwater mitigation system. The evaluation should also consider any potential for streambed or bank erosion downstream from the project.



Source: 2023 City of Fresno South Central Specific Plan, adapted by Ascent in 2023.

Figure 3-6 Proposed Land Use

3.6.5 Proposed Utilities

WATER AND WASTEWATER

To assess the need for future water and wastewater infrastructure needs in the Plan Area, the City retained Akel Engineering Group, Inc to prepare a hydraulic analysis (Akel 2022). This study assesses the impacts of proposed Plan Area water distribution and sewer collection systems resulting from proposed land use amendments. Capacity deficiencies in the existing and future water and wastewater systems were identified utilizing the City's exiting hydraulic model and information from the City's 2020 Urban Water Management Plan, 2010 Water System Master Plan, and 2015 Sewer System Master Plan. The analysis concluded that water and sewer services within the Plan Area must be enhanced to support the development generated by the Specific Plan and maintain the target levels of service. As depicted on Figures 3-13, and 3-14 the following wet utility improvements are proposed as part of the SCSP:

- **Water:** The increase in surface water demand would require the installation of 14.7 miles of new 16-inch transmission grid mains and approximately eight new wells with a capacity of 2,125 gallons per minute (gpm) within the Plan Area.
- **Sewer:** A network of sewer collection infrastructure would be installed throughout the Plan Area to serve development. The proposed wastewater collection system would include installation of new transmission grid mains, upsizing of conveyance pipelines located along North Avenue between Cedar Avenue and Parkway Drive, and lift station capacity upgrade to a 5.4 million gallons per day (mgd).

STORMWATER

The Fresno Metropolitan Flood Control District (FMFCD) is a special-~~purpose~~ district that acquires and constructs facilities for flood control and the drainage of flood and storm waters, and conserves waters within the City. The proposed plan will change ponding basin capacities and require up to two new basins within the planning area. In addition, specific upgrades as part of the proposed plan to maintain service may include new streets and gutters, storm drain inlets, storm drain pipelines, detention and retention basins, pump stations, and outfall facilities that collect and drain runoff from developed land areas. Development would be planned in accordance with requirements set forth under the Stormwater Quality Management Plan (SWQMP).

3.7 POTENTIAL PERMITS AND APPROVALS REQUIRED

The Fresno City Council is the CEQA lead agency responsible for considering adoption and implementation of the proposed plan. As the lead agency under CEQA, Fresno is responsible for considering the adequacy of the EIR and determining if the project should be approved (Table 3-8).

Table 3-8 Required Approvals

Project Approval	Approving Authority
Approval of the General Plan Amendment, Development Code Amendment, and Rezone	Fresno City Council
Adoption of the South Central Specific Plan	Fresno City Council
Certification of the EIR	Fresno City Council
Repeal of the North Avenue Industrial Triangle Specific Plan	Fresno City Council
Replace the overlapping portion of the plan areas	Fresno City Council

The EIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.

3.8 SUBSEQUENT ENTITLEMENTS AND APPROVALS

This Draft EIR has been prepared by the City to assess the potential environmental impacts that may arise in connection with actions related to implementation of the proposed plan. Pursuant to CEQA Guidelines Section 15367, the City is the Lead Agency for the proposed plan and has discretionary authority over the plan and future project approvals. This Draft EIR is intended to evaluate the environmental impacts of the proposed plan to the greatest extent possible and is used as the primary environmental document to evaluate subsequent planning and permitting actions associated with projects in the Plan Area. Once certified, the City intends for this analysis to be used consistent with all available streamlining provisions in CEQA, including, but not limited to, Guidelines Section 15162-15168, 15182 and 15183.

Other agencies may be consulted during the adoption process, however, their approval is not required for adoption of the proposed plan. Any subsequent development under the proposed plan may require approval of State, federal and Responsible Trustee Agencies that may rely on the analysis in this Draft EIR. These agencies may include but are not limited to:

- California Department of Transportation,
- California State Water Resources Control Board (State Water Board),
- California Department of Fish and Wildlife (CDFW),
- Central Valley Regional Water Quality Control Board (Central Valley RWQCB),
- Fresno Local Agency Formation Commission,
- San Joaquin Valley Air Pollution Control District (Valley Air District),
- Fresno ~~Municipal~~ Metropolitan Flood Control District, and
- Fresno Irrigation District.

3.8.1 Discretionary and Ministerial Actions

The proposed project is a policy-level document and does not include any specific development proposals and may not fully evaluate the impacts of other future specific, individual development that may be approved under implementation of the proposed project. The Planning Commission and other decision-making bodies would review the proposed project and make recommendations to the City Council, who has approval authority for adoption of the proposed plan and related actions. Future projects may be tiered off this Draft EIR or be found consistent with

- **Policy RC-6-g: Protect Recharge Areas.** Continue to protect areas of beneficial natural groundwater recharge by preventing uses that can contaminate soil or groundwater.

City of Fresno Municipal Code

Chapter 6, Municipal Services and Utilities, Article 7, Urban Storm Water Quality Management and Discharge Control, of the Fresno Municipal Code (FMC) establishes provisions regarding stormwater discharges. The purpose of the City's Urban Storm Water Quality Management and Discharge Control Ordinance is to ensure the health, safety, and general welfare of citizens and protect the water quality of watercourses and water bodies in a manner pursuant to and consistent with the CWA (33 US Code Section 1251 et seq.) by reducing pollutants in urban stormwater discharges to the maximum extent practicable and by effectively prohibiting non-stormwater discharges to the storm drain system.

Chapter 11, Building Permits and Regulations, Article 6, Fresno Flood Plain Ordinance establishes methods of reducing flood losses by: restricting or prohibiting uses which are dangerous to health, safety, and property due to water or erosion hazards or flood heights or velocities; requiring that uses vulnerable to floods be protected against flood damage at the time of initial construction; controlling filling, grading, dredging, and other development which may increase flood damage; preventing or regulating the construction of flood barriers which will unnaturally divert flood water or which may increase flood hazards in other areas; and controlling the alteration of natural flood plains, stream channels, and natural protective barriers, which help accommodate or channel flood waters.

Fresno ~~Municipal~~ Metropolitan Flood Control District Post-Development Standards Technical Manual

Water quality treatment for post-construction discharges to stormwater in the FMFCD Master Plan Area is provided by detention and retention basins (henceforth referred to as retention basins) that are parts of FMFCDs stormwater drainage system. The FMFCD manages urban stormwater runoff in the Fresno-Clovis area. The City of Fresno Public Works Department maintains streets and gutters that convey stormwater to storm drain inlets. Storm drainage improvements are funded by local drainage fees paid by developments and are built by the FMFCD, by developers, or both. Basins are highly effective at reducing average concentrations of a broad range of contaminants, including several polyaromatic hydrocarbons, total suspended solids, and most metals. Pollutants are removed by filtration through soil, and thus don't reach the groundwater aquifer. Basins are built to design criteria exceeding Statewide Standard Urban Stormwater Mitigation Plan (SUSMP) standards. The urban flood control system provides treatment for all types of development.

The FMFCD published a Post-Development Standards Technical Manual in 2014 to provide development and redevelopment standards to address stormwater quality requirements for projects in areas that do not drain to the Regional Stormwater Management Basin System. Per the manual, five drainage areas in the FMFCD service area do not drain into a stormwater management basin and two areas outside the service area do not drain into a regional stormwater management basin. These post-development requirements were developed to comply with the MS4 Permit maintained for stormwater and non-stormwater discharges from MS4 to waters of the United States. The manual provides guidance and recommendations for implementing stormwater quality BMPs with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

Regionwide MS4 Permit (2016)

The Central Valley RWQCB issued a region-wide permit (Order No. R5-2016-0040) covering the entire Central Valley RWQCB Region and storm drainage systems in cities as small as 10,000 population, in June 2016. The MS4 Permit for Fresno County, Order No. R5-2016-0040-015, was issued on May 17, 2018.

Permittees must develop and implement a Storm Water Management Program (SWMP) including the following elements:

- Illegal Connection and Illicit Discharge Elimination Program
- Construction Storm Water Runoff Control Program

Of the 5,567-acre Plan Area, approximately 4,321 acres is developed as industrial, commercial, residential and other land uses, and approximately 1,308 acres is open space and farmland. Approximately 700 acres of the Plan Area is conservatively assumed to be developed with non-residential uses, primarily industrial, by the year 2040. While it is not possible to identify where future development would occur, it is reasonable to assume that—in addition to some redevelopment—open space, farmland, and vacant areas would be developed. Bare soil on farmland (such as between rows or trees) is more susceptible to erosion than developed urban land. Thus, while future development under the plan could reduce erosion in some portions of the Plan Area, it would also create substantial areas of impervious surfaces, such as roadways, parking lots, driveways, and roofs, and would increase stormwater runoff to receiving creeks and storm drains. All future development would be required to include water quality BMPs, and detention/retention basins, as appropriate, designed to minimize or eliminate increases in runoff entering existing surface water courses and storm drains. Peak runoff and total volume of runoff would be managed by storm drainage design, which would retain water and promote infiltration to groundwater. As discussed in Section 4.16 Utilities and Service Systems, storm drainage facilities in the Plan Area are planned, implemented, operated, and maintained by the FMFCD. Specific upgrades may include new streets and gutters, storm drain inlets, storm drain pipelines, detention and retention basins, pump stations, and outfall facilities that collect and drain runoff from developed land areas.

Remove Sentences related to LID's

FMFCD retention basins [illegible] moving total suspended solids including sediment. The proposed plan would not alter dra[illegible]er that would cause flooding, erosion, or siltation. The drainage pattern in the Plan Area would remain similar to current conditions, but would be expanded over time in compliance with the FMFCD Storm Drain Master Plan as development occurs over the planning period. ~~Surface runoff from the area would be managed via parcel-based LID measures, detention/retention basins, and flow reducing BMPs to prevent local flooding within the site. These features would also reduce peak flows from the Plan Area to receiving creeks and storm drains to amounts equal to or less than flows under existing conditions. Sediment in the stormwater flows would be captured in detention ponds designed to prevent siltation.~~

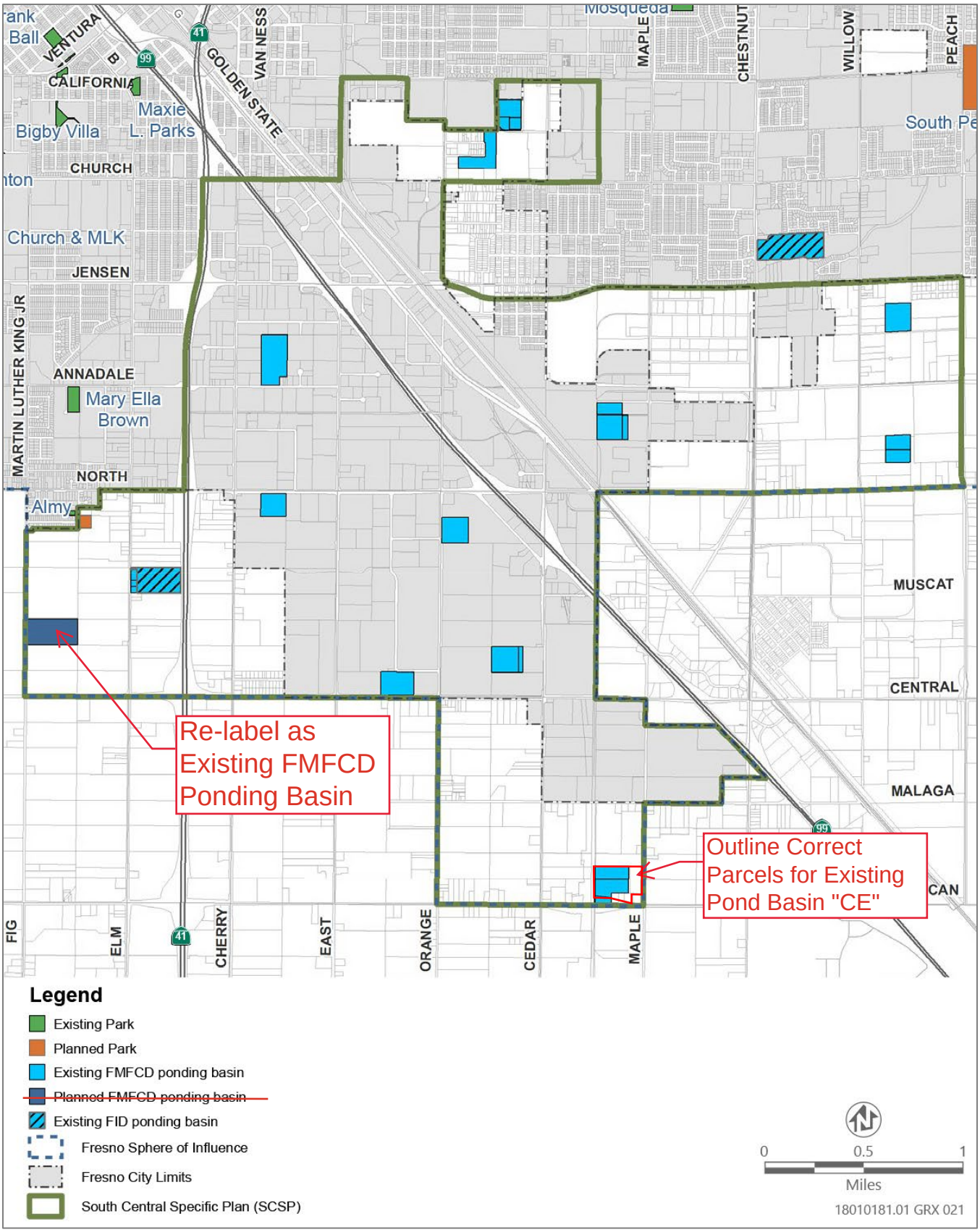
Regulatory requirements such as the City's grading plan check process, the FMFCD Storm Drain Master Plan, and the NPDES Construction General Permit would also reduce the impacts of construction activities on drainage patterns and erosion. Development within the Plan Area would be required to comply with the grading plan check process. Developers must submit grading plans in compliance with the California Building Standards Code (CBC), the Storm Drain Master Plan, and the NPDES Construction General Permit and obtain approval from the FMFC.

The Storm Drain Master Plan includes proposed elevation of curbs in undeveloped areas, delineation of storm drain inlet watershed areas, collection system pipeline alignments and sizes, and retention basin or urban detention basin locations and sizing. Development in conformance with the Storm Drain Master Plan would require that the Plan Area is graded to drain into storm drainage facilities, which collect and convey stormwater from the planned development. Retention and urban detention basins intercept and remove silt from stormwater before it is discharged to surface waters.

The grading plan review process for future individual development projects in the Plan Area would identify any plan to alter the course of any creek, stream, or irrigation canal. In this case, the City would require additional other reviews, permits, and agreements with agencies such as the USACE, the United States Fish and Wildlife Service (USFWS), the CDFW, the Central Valley Flood Protection Agency, the State Water Board, the Central Valley RWQCB, the FMFCD, and the FID. Possible permits and agreements include the CWA Section 401 and 403 permits, Endangered Species or Habitat Plan, Section 1603 Streambed Alteration Agreement, and Irrigation Canal Encroachment permit. Agreements would need to be made prior to the issuance of grading permits.

The NPDES Construction General Permit program is administered for the City by the Central Valley RWQCB. It regulates sources of erosion at construction sites that would result in the discharge of silt-laden stormwater from the site and into subsequent receiving waters during both construction and operation activities.

The proposed plan would not alter existing drainage patterns in a manner that would result in substantial erosion, siltation, flooding, polluted runoff, or redirection of flood flows. With the implementation of applicable policies and compliance with existing regulatory requirements that pertain to water quality and runoff, and with the design and



Source: 2023 City of Fresno South Central Specific Plan, adapted by Ascent in 2023.

Figure 4.14-4 Existing and Planned Parks and Ponding Basins

- Construct a 25,000 AF/year recycled water facility as an expansion to the RWRF in accordance with the January 2014 City of Fresno Metropolitan Water Resources Management Plan. This improvement is required after the year 2025 and is identified as a required facility as part of the Mitigation Measure UTL-1.2.1 in the City's General Plan EIR.
- Construct a 0.49 mgd expansion of the NFWRF.
- Construct 24 mgd wastewater treatment facility within the Southeast Development Area, in accordance with the City of Fresno 2006 Wastewater Master Plan.
- Additional 9.6 mgd expansion at the RWRF.

STORMWATER

165

The Fresno Metropolitan Flood Control District (FMFCD) provides stormwater collection and disposal, and flood control to the north-central portion of Fresno County, between the San Joaquin and Kings Rivers, covering ~~164~~ adopted or proposed drainage areas. FMFCD's local stormwater drainage system consists of interconnected surface conveyances, storm drains, retention basins, pump stations and outfalls, which discharge to groundwater, irrigation canals, creeks, and the San Joaquin River. The system is designed to retain and infiltrate as much runoff as possible into the underlying groundwater aquifer. Under FMFCD requirements, development proposals must elevate building pads so that finished floor levels are above the anticipated high-water elevation and establish an outlet flow path for the runoff of major storms through the use of street improvements, easements, or other public rights-of-way to consider the flow path and potential flooding resulting from major storms (FMFCD 2017).

ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS

Electric Power

Fresno receives its electricity from Pacific Gas and Electric Company (PG&E). PG&E provides electrical service to business and residents throughout the Plan Area via underground and aboveground service lines. PG&E owns and maintains all service and transmission lines in the Plan Area and operates several electrical substations throughout the Plan Area.

Natural Gas

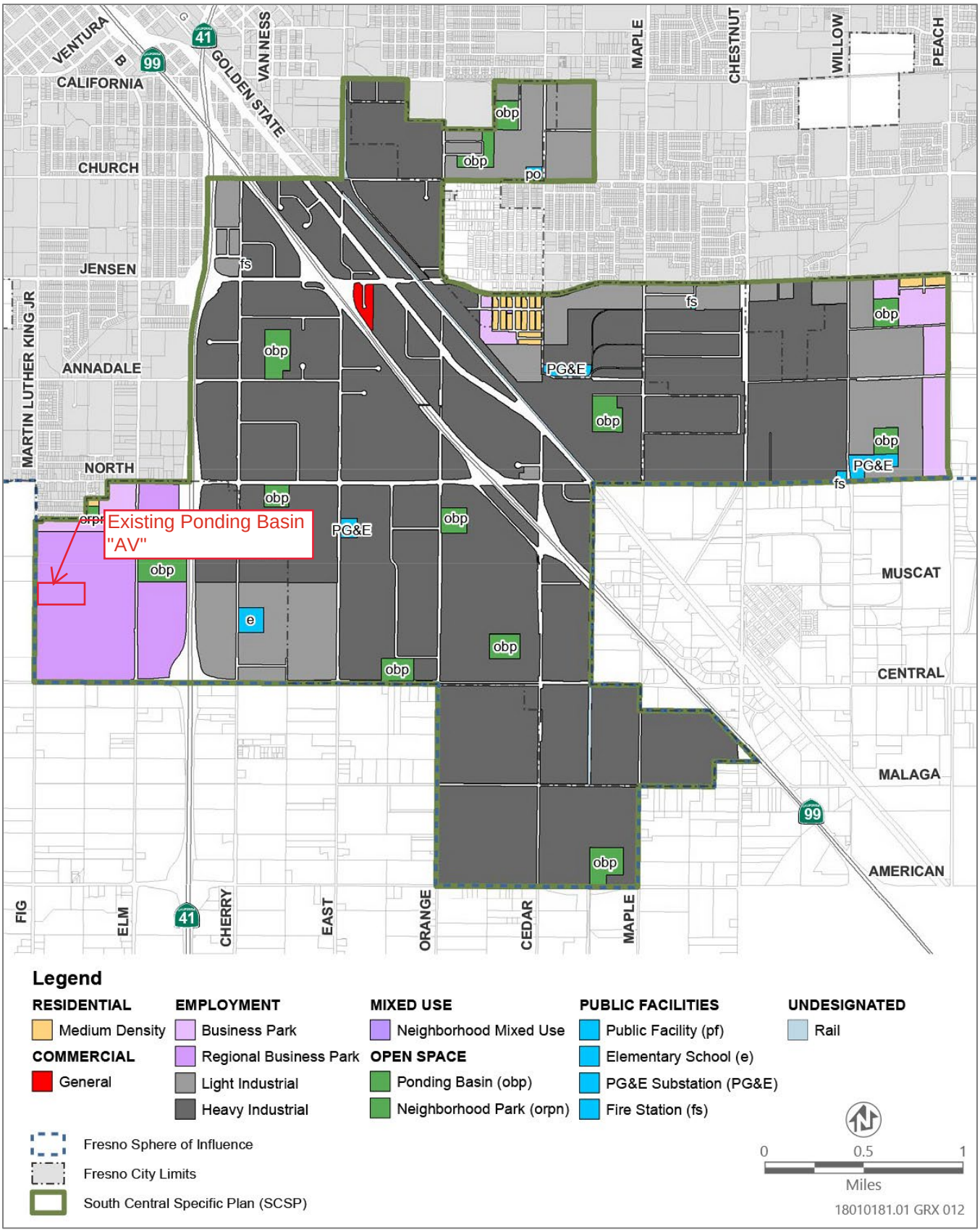
PG&E is the natural gas service provider in the Plan Area. PG&E owns and maintains several natural gas transmission lines in the Plan Area that feed local distribution lines that connect to individual service lines.

Telecommunications

Several providers provide telecommunication services to the Plan Area. AT&T is the largest provider of cellular and fixed telephone services. Telephone lines are located throughout the Plan Area.

SOLID WASTE

Residential solid waste in the City is collected in three bins for green waste, garbage, and recyclables. The City has granted exclusive franchise agreements for the collection of commercial solid waste, recyclables and green waste to two franchises. Allied Waste Services (formally Republic) is responsible for all commercial services north of Ashlan Avenue, north of the Plan Area, and Mid Valley has all commercial locations south of Ashlan, including the Plan Area. Both haulers are responsible for commercial, multifamily, and industrial collections, up to 8 cubic yards, which fall into City of Fresno jurisdiction. The refuse from customers' garbage bins is collected by the City of Fresno Solid Waste Division and is taken to the Cedar Avenue Receiving and Transfer Station (CARTS) facility for sorting and transfer. Once off-loaded at the transfer station, the garbage is then loaded onto large trucks and taken to the American Avenue Landfill. Fresno County operates the American Avenue Disposal Site, which serves as the county's regional landfill (City of Fresno 2020). As of June 2022, the American Avenue Landfill has a maximum permitted capacity of



Source: Image produced and provided by the city of Fresno, Adapted by Ascent Environmental in 2023.

Figure 6-1 No Project/General Plan Land Use Alternative: Planned Land Use

Hydraulic Analysis for the Plan Area

To best understand how to plan for the future water and wastewater needs of the Plan Area, the City hired the Akel Engineering Group to prepare a hydraulic analysis. See Appendix F for the South Central Specific Plan Water and Sewer Hydraulic Analysis. This study assessed the impacts to the Plan Area water distribution and sewer collection systems due to the proposed land use amendments. Capacity deficiencies in the existing and future water and wastewater systems were identified utilizing the City's existing hydraulic model and information from the City's 2020 Urban Water Management Plan, 2010 Water System Master Plan, and 2015 Sewer System Master Plan. Changes in sewer and water demand were derived from acreages by land use classifications for the Specific Plan in Table 4-4.

The analysis concluded that water and sewer services in the Plan Area must be enhanced to support the buildout of the Plan Area and maintain the target level of service. It is important to note that the analysis is based on full build out of the Plan Area which could occur beyond the planning horizon of 2040. Since it's impossible to know what part of the Plan Area will build when, total build out was analyzed to determine the size and type of infrastructure needed incrementally as development occurs. See Figures 7-1 through 7.4.

Water Supply

The City proposes balancing anticipated groundwater use with sufficient recharge of imported surface water. The SSWTF currently treats approximately 54 mgd of surface water but has a maximum treatment capacity of 80 mgd. This maximum treatment capacity of 80 mgd was assumed for the SCSP Hydraulic Analysis. The increase in surface water treatment will partially supply the Plan Area due to a solid backbone of Regional/Grid Transmission mains, however a combination of existing and new supply wells may be required to service the Plan Area demands. Existing wells will first be utilized to make up the water supply balance, however new wells may be needed to maintain acceptable pressures to service the proposed development intensifications within the Plan Area boundaries.

The projected water demands for the Plan Area are estimated at 15.4 millions of gallons per day (mgd) for average day demands, 29.3 mgd for peak day demands, and 44.7 mgd for peak hour demands. These demands are less than what was assumed in the General Plan.

Wastewater Flows

The projected wastewater flows for the Plan Area are estimated at 11.6 mgd for average annual flows, 13.4 mgd for peak day dry weather flows, and 15.1 mgd for peak month wet weather flows. These demands are less than what was assumed in the General Plan.

Water and Wastewater System Infrastructure Needs

This section documents the hydraulic analysis results and infrastructure improvements needed to meet water and wastewater demands in the Plan Area. The recommended improvements are less than what is assumed in the General Plan. See Table 7.1.

Storm Water

act

The FMFCD is a special-~~purpose~~ district, created by local voters in 1956, for the purpose of acquiring and constructing facilities for

flood control and the drainage of flood and storm waters, and for the conservation of those waters. The FMFCD is a member of the North Kings GSA and provides flood control within a 399-square mile watershed in Fresno County. The FMFCD provides urban storm drainage, groundwater recharge, recreation space in dual use ponding basins, and Clean Water Act pollution prevention compliance assistance to businesses and industries. The flood control and urban drainage systems work in concert to protect lives and property from floodwater originating in the foothill streams and creeks, and from rain that falls onto the urban area.

After the FMFCD was established, a new system was designed to capture and store stormwater, and standards for future development were created to ensure the construction of a comprehensive system over time. As the urban area grows, more storm runoff is generated by structures that cover once-open-land, including streets, highways, buildings, and parking lots. Stormwater flows from street gutters to drainage inlets, and through underground pipelines to a network of stormwater detention ponding basins. Each ponding basin collects and stores stormwater for an upstream area of about 1-4 square miles. The stormwater basins allow large amounts of water to be stored and percolated through the soil to replenish the groundwater aquifer.

The Plan Area has ~~ten~~ eleven existing FMFCD ponding basins ~~and one planned ponding basin to be located on the east side of Fig Avenue, between North and Central Avenues~~. See Figure 7-5. These storm drainage facilities are documented in the Storm Drainage and Flood Control Master Plan (SDFCMP), which is developed and updated by FMFCD. The size and location of the ponding basins are determined by using the acreages by planned land use designations from the Fresno General Plan, adopted in December 2014.

In areas that already have existing storm drainage facilities, any increased densities may require mitigation. Because the storm drainage system has already been constructed, a study would be required for increased densities or changed zoning on existing land. Increased density creates additional runoff that would potentially produce flooding in locations where the FMFCD Master Plan storm drainage system is complete. Therefore, such proposals must be reviewed and approved by the FMFCD on a case-by-case basis to determine the ability to accommodate the proposal. Mitigation could be in the form of constructing an additional off-site pipeline or storing the difference between the 2-year and 10-year storm event on-site. The ~~480~~ 372 acres ~~outside of the Fresno city limits but~~ in the SOI at the southern edge of the Plan Area boundary is not within a planned drainage boundary and ~~so~~ will need to be accommodated with future Master Planning.

Recycled Water

Water recycling is the reuse of treated wastewater for beneficial non-potable purposes such as agricultural and landscape irrigation, industrial processing, and replenishing a groundwater basin. A common type of recycled water is water that has been reclaimed from municipal wastewater. Using recycled water reduces the need to use drinking water for non-potable uses.

In 2009, the State of California adopted a Recycled Water Policy establishing a mandate to increase the use of recycled water by 200,000 acre-feet per year by 2020 and by an additional 300,000 acre-feet per year by 2030. In support of these goals, the City

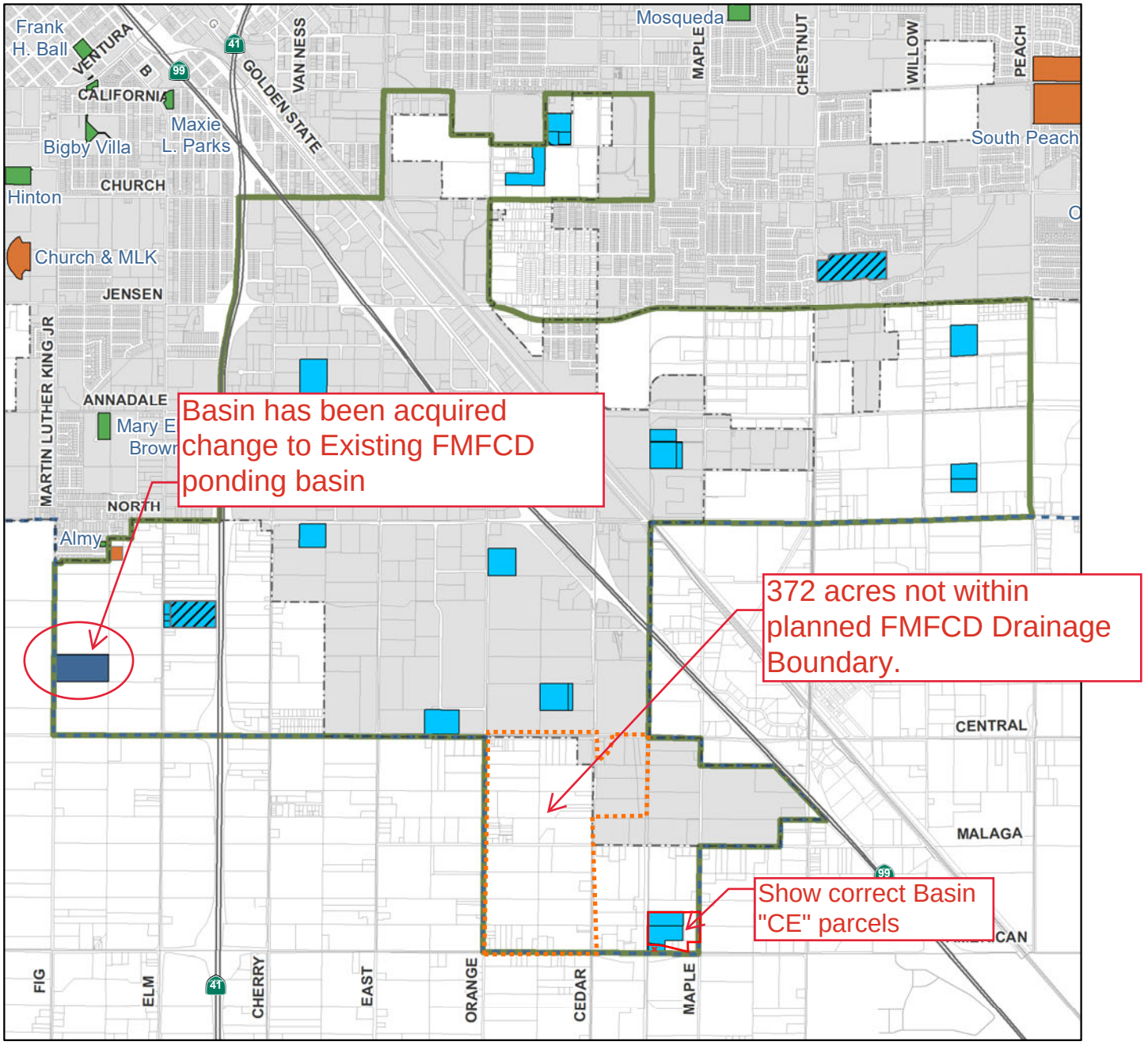


Figure 7-5: Existing and Planned Open Space

Legend

- Existing Park
- Planned Park
- Existing FMFCD ponding basin
- ~~Planned FMFCD ponding basin~~
- Existing FID ponding basin
- Fresno Sphere of Influence
- Fresno City Limits
- South Central Specific Plan (SCSP)

South Central Specific Plan

0 0.5 1 Miles

Source: City of Fresno GIS Data
Prepared by the Planning and Development Department

FORMAX LLC

Physical address
4586 E. Commerce Ave.
Fresno, CA 93725

Phone number
(559) 269 - 5935

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

Dear Ms. Pagoulatos:

My name is Paul Gillum and I am submitting these comments on behalf of Formax LLC on the South-Central Specific Plan (SCSP) and the related Environmental Impact Report (EIR). I am writing to you because we have significant concerns about this report as it is currently written.

Formax LLC is a family business that owns several pieces of property in South Fresno. These properties have businesses on them that employ hundreds of individuals, many who live in the City of Fresno. We have been able to watch these businesses grow over the years and contribute to our community in great ways.

There are several concerns that we have with this report as it is currently written. Some of these concerns are as follows:

- Downzoning
- Buffers
- Mitigation Requirements for new development
- Solar Infrastructure
- Several Infrastructure Improvements

Downzoning from Heavy industrial to Light Industrial would have a very large negative impact for our properties. When we decided to make Fresno our home and purchase these properties, we did it because of the zoning and the location near major interstates. It has been a great location for many years. However, this would not only take an asset and devalue it, but it would directly impact our ability to sell our properties in the future or to move them to the next generation. There are other requirements that are stated in these reports that would make our properties less attractive, and to be honest with you, make doing any business in the City of Fresno less attractive. This would have a direct impact on our ability to grow, attract new employees as well as new opportunities.

It is our desire to continue to call the City of Fresno our home. We need your help to allow us to attract companies to our community and help them prosper. Thank you for considering our comments and I urge you to not adopt the South-Central Specific Plan as it is currently written. It would be harmful to the future of our city.

Sincerely,

Paul Gillum
Managing Member

July 24, 2024

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Dear Ms. Pagoulatos,

On behalf of the Fresno Business Council and the Fresno Stewardship Foundation, we are writing to share our comments on the South-Central Specific Plan (SCSP) from both a historical and future perspective. While we concur with the specific concerns offered by the Fresno Chamber of Commerce, we wish to emphasize the broader implications for our community.

We urge you to recognize the significant strides many businesses have made in addressing environmental and social equity concerns. It is vital to consider the reputation our community holds regarding its treatment of the private sector. Business thrives where it is welcomed, and a supportive environment is crucial for attracting and retaining quality companies.

The Fresno Business Council was founded in 1993 in response to a crisis characterized by rampant crime and a prevailing sense of hopelessness. Our mission has been to diversify and strengthen our economy, ensure education prepares youth for life, career, and citizenship, and encourage collaboration among nonprofits and government programs to foster self-reliance and community contribution. These goals remain central to our efforts.

Advanced manufacturing and ag tech industries are pivotal for our community's prosperity. They produce essential goods and services, offer a wide range of jobs, support numerous professions, and generate the revenue necessary for funding government services, infrastructure, and nonprofits. These industries are the backbone of our community's economic health.

We acknowledge historical grievances that have led some stakeholders to advocate for increased barriers and property rezoning. However, it is essential to recognize the substantial changes businesses have implemented to address these concerns. Critical decisions must be made with the entire community's welfare in mind, not just specific parts.

We urge you to create supportive conditions that allow our current employers to thrive and attract more quality companies to our community. The economy and culture are evolving rapidly, with younger generations bringing innovations and older generations offering wisdom from experience. Leadership must unite to devise strategies that consider the impacts on all stakeholders, focusing on a brighter future for everyone.

It is also important to note that those who claim to be speaking for the disenfranchised may inadvertently be adversely impacting one of the most critical social determinants of health: family income. Restricting

business growth and imposing onerous regulations can reduce job opportunities and wages, directly affecting the economic wellbeing of families in our community.

We call on our elected officials, public servants, and fellow residents to step back from immediate concerns and consider the broader community's long-term wellbeing. When discussions are limited to those directly impacted, the big picture and the interests of the entire community are often neglected. Inclusive prosperity and wellbeing require a holistic and forward-thinking approach, not a reactive one.

We urge the City of Fresno to reassess the SCSP's proposed changes and engage in a more inclusive, collaborative planning process. Ensuring the thriving of local businesses is essential for providing good-paying jobs and sustaining our community's overall prosperity. By working together, we can create a business-friendly environment that supports economic growth and improves the quality of life for all residents.

Thank you for considering our comments.

Sincerely,

Genelle Taylor Kumpe
CEO, Fresno Business Council
& San Joaquin Valley Manufacturing Alliance

Deborah Nankivell
CEO, Fresno Stewardship Foundation

CC: Mayor Jerry Dyer
Members of the Fresno City Council

July 30, 2024

Submitted Electronically

Sophia Pagoulatos, Planning Manager
Planning and Development Department
City of Fresno
2600 Fresno Street, Room 3065
Fresno, CA 93721
scsp@fresno.gov

RE: South Central Specific Plan and Draft Environmental Impact Report – as proposed May 31, 2024

Dear Ms. Pagoulatos:

I write today on behalf of INVEST Fresno and the undersigned organizations and businesses to express our strong concern with the South Central Specific Plan (SCSP) and the related Draft Environmental Impact Report (DEIR), as released for public comment on May 31, 2024.

INVEST Fresno is aligned in our position with the letter and recommendations submitted by John Kinsey, with Wanger Jones Helsley PC.

As currently proposed, the SCSP contains several provisions that are highly concerning to the continued operation and future expansion of existing businesses in South Central Fresno, including, but not limited to, the downzoning of various properties and the inclusion of 1,000-foot buffer zones. The consequences of these changes could destroy living wage jobs and significantly reduce vital tax revenue in Fresno.

DOWNZONING

The SCSP proposes downzoning numerous properties from Heavy Industrial to Light Industrial and other properties from Light Industrial to Business Park, Regional Business Park, or even residential. The proposed downzoning will have wide-ranging impacts on the current and future operations of existing businesses as well as the ability of Fresno to attract new businesses.

Downzoning severely affects landowners and employers by making their properties inconsistent with the new zoning regulations. This change reduces Fresno's attractiveness to reputable and well-capitalized businesses who want to invest in Fresno. Rezoning that creates non-conformities makes obtaining conventional financing nearly impossible — impacting capital improvements necessary for maintenance, beautification, and clean energy upgrades.

Furthermore, legal non-conforming uses make it incredibly difficult for landowners to change tenants even in favorable conditions, and during an economic downturn, it almost guarantees the loss of legal non-conforming status. Additionally, landowners cannot switch from one legal non-conforming use to another. Any enlargement of a legal non-conforming use requires a conditional use permit (CUP), which hampers the ability to attract reputable, national industrial tenants and further reduces the potential to re-let industrial properties.

BUFFER ZONES

The inclusion of 1,000-foot buffer zones in the SCSP is highly concerning. The proposed downzoning of numerous properties, combined with the proposed buffer zones, results in nearly 50% of the SCSP area being impacted.

The buffers would prohibit certain warehousing and distribution activities, such as chemical and mineral storage and freight/truck terminals, and reclassify other activities, including "Limited Industrial" and most warehousing and distribution uses, as conditional uses. Additionally, Health Risk Assessments would be required for all industrial processes, construction, and operations of businesses, regardless of the land use intensity or the probability of adverse health impacts. This will substantially increase costs and, as a result, drive businesses out of Fresno or drive up prices for consumers.

A 1,000-foot buffer zone far outside the norm and three times greater than the standard endorsed by California Attorney General Rob Bonta. In 2022, the California Department of Justice reached a settlement agreement with the City of Fontana relative to their approval of warehouse developments, requiring warehouses that are 400,000 square feet or larger to establish a setback of 300

feet from the property line of the nearest sensitive receptor. In a statement announcing the agreement, Attorney General Bonta stated, "… the City of Fontana has adopted the most stringent environmental standards in California for new warehouse projects. This ordinance should serve as a model for other local governments across the state to build upon."

Additionally, the 2022 agreement with the City of Stockton required that logistics uses and their associated loading docks are no closer than 300 feet from sensitive receptors. In a statement announcing the agreement, California Attorney General Rob Bonta stated, "I hope this serves as a model for future warehouse projects across the state."

Finally, the California State Legislature has repeatedly rejected recent efforts (AB 1000, Reyes, 2023 and AB 2840, Reyes, 2022), which would have prohibited public agencies in San Bernardino and Riverside Counties from approving the development or expansion of a warehouse of 100,000 square feet or more within 1,000 feet of a sensitive receptor.

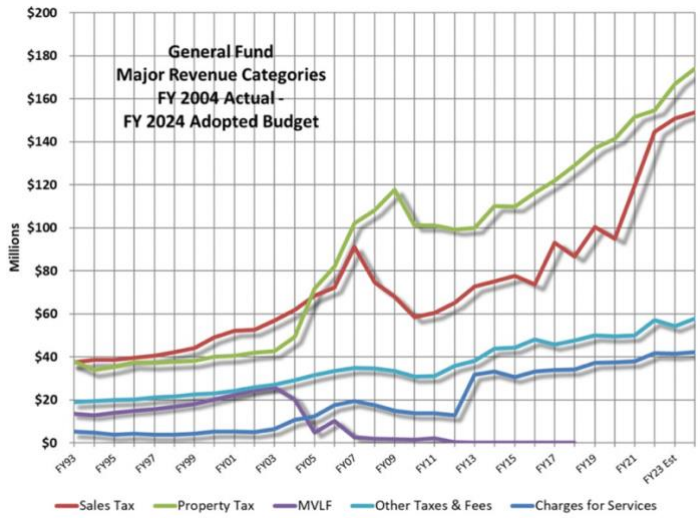
We are currently unaware of any city or county near Fresno that has implemented 1,000-foot buffers. Given the significant demand for industrial development within the city and the limited available locations for such projects, adopting these buffers would likely push new industrial developments—and the jobs and tax revenue they bring—to neighboring municipalities. We cannot support any policy that would jeopardize Fresno's success as an industrial hub or encourage our workforce to relocate.

SCSP ECONOMIC & COMMUNTIY BENEFITS

South Central Fresno is the city's economic engine and delivers an outsize impact for the entire city, while fewer than a quarter of one percent of residents live within the 5,629-acre planning area. In 2022, this area, that represents 7.5% of the city's land, generated approximately $13 billion in economic activity (35% of the city's total economic output) and more than $102 million in tax revenue (21% of the city's general fund).

Home to more than 440 businesses, the SCSP directly provides approximately 22,070 full-time equivalent (FTE) jobs and creates nearly 48,000 FTE jobs citywide (25% of the City's FTE employment). Additionally, the average annual wage for the provided FTE jobs is slightly higher than the rest of the city at $68,000.

In the past six years, Fresno's new retail distribution economy has taken flight — increasing the city's sales tax revenue at unprecedented levels. It took the preceding 20 years for Fresno to experience a similar amount of growth in sales tax revenue. Unlike traditional sales tax revenue that is only generated from purchases within the city, Fresno receives sales tax revenue from items that are shipped from local retail distribution centers regardless of whether the shopper lives in Fresno, Los Angeles, or another state.



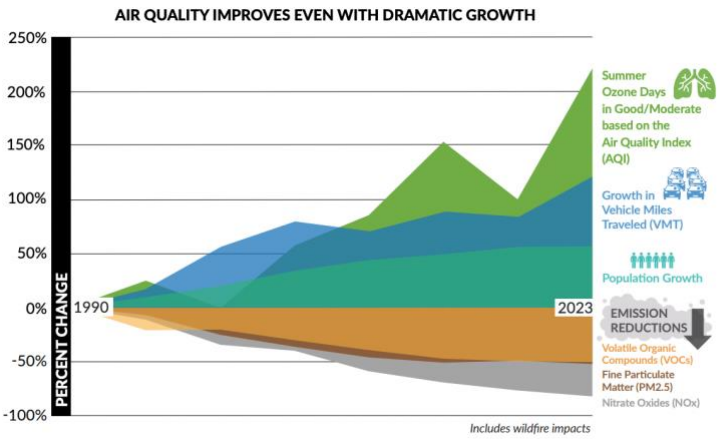
Source: [City of Fresno, FY 2025 Mayors Proposed Budget]

Bolstering the City's General Fund provides benefits for all Fresno residents – all of which support essential city and community services like public safety, parks, infrastructure improvements, and numerous other critical programs that residents rely on every day.

AIR QUALITY IMPROVEMENTS

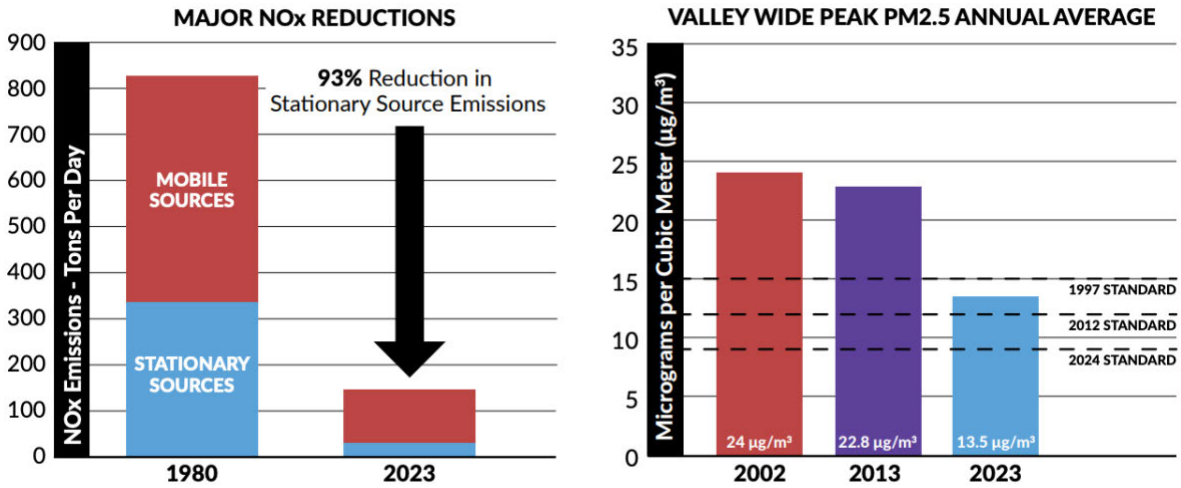
There is no denying that the air we breathe in the Central Valley is dirtier than elsewhere in the state and nation (except for the LA basin). Due to the Valley's topography and meteorology, surrounded by mountains and subject to frequent temperature inversions, pollutants become trapped, and, as a result, cities like Fresno, Visalia, and Bakersfield wind up at the top of the state's most polluted cities. While ominous, this is not the end of the story.

The primary pollutants of concern in the Central Valley are ground-level ozone, and fine particulate matter (PM2.5), including diesel particulate matter (DPM). Since 1980, the Central Valley has reduced emissions of these pollutants from stationary sources (i.e., oil production and refining, boilers, and other stationary equipment) by 85%. According to the EPA, regulations on mobile sources such as cars and light trucks have reduced emissions by 99 percent since 1970. Heavy-duty trucks are roughly 99 percent cleaner than 1970 models.



Source: [San Joaquin Valley Air Pollution Control District, 2023 Annual Report]

Whereas, Valley residents' exposure to elevated ozone and fine particulate matter (PM2.5), often cited as one of the most harmful to the lungs, has also fallen by 90% and 85% respectively. In total, this has led to a 95% reduction in cancer risk for Valley residents from exposure to air pollutants according to the San Joaquin Valley Air Pollution Control District.



Source: *San Joaquin Valley Air Pollution Control District, 2023 Annual Report*

These historic reductions in air pollution over the past 40 years were accomplished at the same time Fresno's population grew 2.5 times larger and our local economy more than doubled in size.

Since 1992, San Joaquin Valley Air Pollution Control District has implemented roughly 650 rules and regulations that along with California's nation-leading regulations on cars and trucks are helping to steadily improve the air quality in the Valley.

All this illustrates that the key to clean air and a healthy community is a strong and growing economy.

CONCLUSION

Downzoning, buffers, and limited protection from legal non-conforming use provisions will result in existing businesses abandoning the City and repelling new businesses from entering – along with the countless jobs and significant tax revenue they provide.

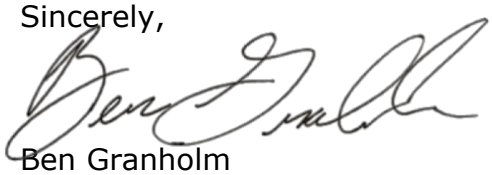
As the community of Fresno, if we are going to continue the progress we are making and redouble our commitment to raising the standard of living for low-income families, then we must do all that we can to support a diverse and growing economy. A pivot away from a growth-oriented economy here in Fresno would reverse the incredible success our community has seen and risk more families falling into poverty.

A growing economy and sensible air quality regulations have to work in tandem. The transition to zero-emission heavy-duty trucks cannot be achieved if policies are enacted that discourage and limit Fresno's economic growth, which is necessary to afford this new technology.

We appreciate your time and consideration and respectfully urge the City to reject the SCSP as currently proposed and implement policies that support and encourage investment in Fresno's infrastructure that result in community improvement, encourage economic development, and ensure that Fresno can continue to thrive for generations to come.

If you would like to discuss this matter further, please do not hesitate to contact Ben Granholm at info@INVESTFresnoCA.com. We look forward to working with you and staff to help keep Fresno's economy moving.

Sincerely,



Ben Granholm
INVEST Fresno

Advanced Emission Control Solutions, LP
Betts Company
Buzz Oates
Cedar Avenue Recycling & Transfer Station
Central Valley Business Federation
Certified Meat Products
Cossette Investments
Don Pickett & Associates
Diversified Development Group
Fowler Packing
Fresno Business Council
Fresno Chamber of Commerce
Fresno County Farm Bureau
JD Food
La Tapatia
Legacy Construction
Newmark Pearson Commercial
North Pointe Business Park
Pickett Solar
Precision Civil Engineering, Inc.
Robert V. Jensen, Inc.
San Joaquin Valley Manufacturing Alliance
Strategic Freight Network
Sunnyland Mills
Tank Specialties of California
Valley Wide Beverage

cc: Jerry Dyer, Mayor
Councilmembers, City of Fresno
Jennifer Clark, Director, Planning and Development Department
Lance Lippincott, Director, Economic Development Department

fresh.local.honest.food.™

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

Dear Ms. Pagoulatos:

My name is Mark Ford and I am submitting these comments on behalf of JD Food on the South-Central Specific Plan and the related Environmental Impact Report. I am writing to you because we have significant concerns about this report as it is currently drafted.

JD Food is celebrating our 50 Year anniversary this year and we are proud to call Fresno our home. We distribute food and food related products to restaurants, schools, retail stores, hospitals, and camps in Northern California. We are an independent family-owned company that is extremely invested in our community. We take great pride in being part of the solutions to many of the challenges that our community faces by supporting the nonprofits and agencies throughout our city and beyond. Also, many of our employees live in the City of Fresno and specifically South-Central Fresno.

There are several concerns that we have with this report as it is currently drafted. If this were to be approved, it would have devastating effects on our business and our ability to be competitive and grow. Some of these concerns are as follows:

- Downzoning
- Buffers
- Mitigation Requirements for new development
- Solar Infrastructure
- Zero Emission Trucks and Equipment
- Several Infrastructure Improvements

Since we are a distribution company, we are already subject to strict CARB requirements for the state of California. We have invested thousands of dollars in updating our equipment, so it meets the state's requirements. This has certainly resulted in improvements in greenhouse gas emissions. Over the past 10 years we have improved our emission systems by 98.5%. Although this is great news, it has come at a great cost to our business. The EV requirements as stated in the SCSP ask for technologies that either do not exist or that the infrastructure cannot support. The plan puts an undue burden on our company by investing in technologies that do not have the capacity to support our needs at a very high cost.

We are also concerned with this plan causing more stress on the ability to get permits. The permit process in our city is extremely difficult to navigate. This plan could make it almost impossible to move through this process and have a successful development. This will result in future jobs moving to outlying communities, refusal to upgrade older establishments, and a rise in working outside the boundaries of the process.

It is our desire to continue growing our business in the City of Fresno and calling this our home. We need your help to allow us to operate in a community that supports us and helps us succeed. Thank you for considering our comments and I urge you to not adopt the South-Central Specific Plan as it is currently drafted.

Sincerely,

Mark Ford
CEO

Physical
4671 E. Edgar Ave.
Fresno, CA 93725

Mailing
P.O. Box 12051
Fresno, CA 93776-2051

Phone: (559) 445-1123
Toll Free: (800) 464-6144
Fax: (559) 445-1044

jdfood.com

July 30, 2024

Submitted via email
scsp@fresno.gov

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

RE: Comments in Response to the Draft South Central Specific Plan

Dear Ms. Pagoulatos,

The undersigned organizations and community members are writing to provide comments to the draft South Central Specific Plan (SCSP). The expansive industrial development proposed in the SCSP will have detrimental consequences in an already overburdened community while also denying the community of the amenities it needs to thrive. The City of Fresno must reassess the recommendations that it will receive and has received from community stakeholders and update the plan to conform with local and state policy goals and mandates and usher in a healthy and robust future for South Central Fresno.

I. The South Central Specific Plan Area and Surrounding Neighborhoods Already Suffer Disproportionate Environmental Burdens

The SCSP area encompasses and extends up to large swaths of Southwest, South Central, and Southeast Fresno which are home to various communities and neighborhoods and thousands of people. These neighborhoods include Calwa, Malaga Daleville, the Flamingo Mobile Home Park, the Roy and Almy Avenue neighborhoods in West Fresno, the neighborhood along Britten Avenue, the neighborhood located at Drummond and Jensen Avenues in Southeast Fresno, among others, as well as elementary schools, religious facilities, parks, and other sensitive community locations. These neighborhoods are amongst the most environmentally burdened in the entire State of California according to California Environmental Protection's (EPA) CalEnviroScreen 4.0 tool (Attachment 1 CES 4.0 Results Data Dictionary). In fact, the most socio-economically and environmentally burdened census tract in the 8,057 census tracts in California is found in the City of Fresno within the boundary lines of the SCSP. (Attachment 2

CES 4.0 Map of census tract 6019001100). The rest of the census tracts within the boundary lines are all found in the top 5% of CalEnviroScreen's most impacted census tracts across California (see attachment 1). Even further specific evidence has been documented in the recent results of UC Merced's Health Impact Assessment whose data shows that there are high rates of chronic health conditions correlating with the proximity to truck routes and high polluting sources.[1]

Despite well-documented data demonstrating such disproportionate impact and repeated oral and written comments by community residents living within the plan area, the City proposes a plan that will further exacerbate and entrench environmental impacts.

II. The Draft South Central Specific Plan Will Increase Health and Safety Risks for Residents of the Specific Plan Area

The draft South Central Specific Plan would continue to facilitate and concentrate intensive and industrial land uses in the SCSP neighborhoods and its implementation will intensify truck traffic, including heavy-duty diesel truck traffic. Additionally, proposed development standards, encompassed in a draft overlay zone, are insufficient to protect sensitive receptors from the deluge of industrial uses and trucks. Industrial uses exacerbate health, safety, and the quality of life in the already overburdened South Central planning area. Some of the impacts of industrial development include pedestrian, bike and road safety, air pollution from diesel and gas combustion along with emissions from breaking and tire deterioration, vibration and noise of passing trucks; light pollution throughout the night interrupting sleep and well-being, and groundwater depletion and degradation.

A. Implementation of The South Central Specific Plan Will Increase Industrial Uses In Areas Zoned Industrial, Business Park, and Even General Commercial

The Draft SCSP, as currently drafted, will facilitate significant increases in intense and polluting uses near and impacting sensitive receptors. For instance, despite an apparent shift from Industrial Zones to Business Parks and Regional Business Parks throughout much of the plan area, Business Park and Regional Business Park allow for many - if not most - of the uses allowed in industrial areas including but not limited to warehousing and other facilities that attract truck traffic. Business Park and / or Regional Business Park allows for construction and material yards, custom manufacturing, limited industrial uses, indoor warehousing and storage, outdoor storage, personal storage, wholesaling and distribution, freight / truck terminals and warehouses, light fleet-based services, and agricultural processing.[2] These uses will intensify and

[1] Fresno Community Environmental Health Impact Assessment: https://clc.ucmerced.edu/publications

increase pollution and nuisance in the overburdened neighborhood.

Even the General Commercial Zone will allow for uses that are not appropriate for areas adjacent to sensitive receptors. On page 58 of the draft SCSP, it states that "The Commercial - General designation allows for a wide range of commercial uses *that are not appropriate in other areas because of higher volumes of vehicle traffic and potential adverse impacts on other uses*. Examples of allowable uses include: building materials, storage facilities with active storefronts, equipment rental, wholesale businesses, and specialized retail not normally found in shopping centers." Some of the more intensive uses General Commercial zoning allows include such as building materials and services, construction and material yards, and communications facilities within buildings. Such uses are not allowed in zones more appropriate for residential neighborhoods including Neighborhood Mixed Use.

B. Truck Traffic in the Plan Area Will Intensify with Implementation of the Plan

The Draft SCSP acknowledges increased traffic as a result of plan implementation but does not identify what share of that increase will be due to heavy duty trucks. The truth is that plan implementation will significantly increase truck traffic by facilitating uses that rely on heavy duty trucks. The Draft SCSP relies on a truck reroute study that is currently pending before City Council. Not only has that reroute study not been adopted, but it will also be an inadequate tool - if adopted - to protect the South Central Plan area from truck traffic, pollution from trucks, and the safety impacts of truck traffic.

It is notable - and of great concern - that the Truck Reroute study identifies truck regulated areas designed to limit throughway truck traffic on neighborhood roads - a designation that eludes the vast majority of the South Central planning area. This raises the concern that the truck reroute study will actually push truck traffic to the South Central neighborhoods and leave them even more vulnerable to the impacts of trucks - both those with starting points or end points in the plan area, or those using its roads as thoroughfares. While one important road - Cherry Avenue from Central Avenue to North Avenue - will not be a truck route, sensitive receptors along that route will still be subject to heavy duty truck traffic that services use on or near that road. In short, the truck reroute study, if adopted, will not protect the residents and students who live, play, and study in the South Central planning area from increased truck traffic that implementation of the plan will attract.

It also bears noting that the Truck Reroute Study fails to follow the recommendations of the accompanying UC Merced Health Impact Assessment which called for at least a 1,000 foot

[2] Agricultural processing would require a conditional use permit in Regional Business Park and Business Park zones.

buffer between sensitive receptors and diesel trucks.[3] Implementation of the South Central Specific Plan, even with incorporation of the truck reroute study, will guarantee intensification of truck traffic within 1,000 feet of sensitive receptors throughout the plan area.

C. The Development Standards in the South Central Specific Plan Will Not Protect Sensitive Receptors from Industrial Land Uses.

The Draft SCSP includes a proposed overlay zone that will require certain protections and standards to protect sensitive receptors from industrial land uses. Unfortunately, the overlay zone is unclear and ambiguous in parts and does not provide or require the necessary protections to ensure that industrial land uses will not hurt the people living, working, playing, studying, and praying in the SCSP area. Most notably, the proposed overlay zone purports to create a buffer between industrial and otherwise intense land uses and sensitive receptors. The buffer will not do that as it will not preclude warehouses and other industrial uses from nearly neighboring homes and other sensitive receptors. The overlay policies and the buffer zone in particular merely create an illusion of protection, similar to the shift from industrial zoning to business park.

1. The Proposed Overlay Zone is Unclear and Ambiguous

The Draft Overlay Zone includes three categories - (1) prohibited uses, (2) uses that are not allowed within 1,000 feet of a sensitive receptor, and (3) uses that are allowed within 1,000 feet of a sensitive receptor subject to some conditions, most notably a conditional use permit. The Overlay Zone will not lead to better protections of the residents in the South Central communities because the language of the draft SCSP ensures that there are loopholes to benefit industrial stakeholders so that their planning projects can continue in the same destructive patterns that impact the residents.

a. The proposed overlay zone does not appear to address all industrial land uses allowed in the SCSP area

Several allowable land uses in the Industrial and Business Park zones are not included in the list of prohibited uses, uses that cannot be within 1,000 feet of a sensitive receptor, or allowed within 1,000 feet but subject to a conditional use permit. General Industrial, for example, is allowed in industrial zones however it is not included in any of the three categories. Similarly Intense Industrial is allowed in Heavy Industrial zones but is not included in any of the categories identified in the plan. Agricultural processing as well is allowed in Industrial and Business Park zones but it is not included in any of the three categories. It is unclear if these and

[3] Fresno Community Environmental Health Impact Assessment: https://clc.ucmerced.edu/publications

other industrial uses that are allowed in industrial and business park zones will be subject to any of the requirements in the overlay zone.

b. It is unclear how uses that fall in "Category 3" will be treated if they do not meet the conditions required by "Category 3"

Several uses are listed in category 3 (uses that can be within 1,000 feet of a sensitive receptor but that require a Conditional Use Permit) are subject to other requirements. It is unclear what rules would apply to those uses if they did not meet the identified requirements, i.e. CARB criteria for zero or near zero emissions. Would these uses be allowed beyond 1,000 feet from a sensitive receptor? Would they simply not be allowed? The development standards are unclear and confusing with respect to several of these uses, including warehousing uses, in category 3.

c. The SCSP does not define or accurately describe what criteria near zero or zero emission facilities must meet

The SCSP notes that three types of warehousing, storage, and distribution uses are allowed within the proposed 1,000 feet "buffer" around sensitive uses as long as these uses meet CARB criteria for near zero or zero emission facilities, as defined in CA Sustainable Freight Action Plan (July 2016). However, the state's Sustainable Freight Action Plan does not appear to include a list of criteria for facilities to be considered zero emission or near-zero emission and neither the SCSP nor the accompanying DEIR provide any details about the required criteria. Thus, the public and decision-makers have no way of understanding how uses would qualify as "zero or near-zero facilities," reduce emissions, or compare to other warehouses. Moreover, the California Sustainable Freight Action Plan does not define the term "near- zero" so it remains unclear what the SCSP's use of the term even means and how it can be verified.

d. The SCSP recommends set-backs for "industrial uses" but does not define such uses

The proposed overlay zone recommends building set back standards for industrial uses but does not provide details about what uses would be subject to this recommendation. Members of the public, developers, and even the City's decision-makers would be left guessing what uses would be subject to the setback standards.

2. The Proposed Overlay Zone Still Allows Intensive Industrial Uses Near Sensitive Receptors

The Overlay Zone does not provide sufficient protection from industrial uses, other intensive land uses, or related truck traffic. It will not prevent the continued environmental

degradation of the South Central Specific Plan Area nor will it protect sensitive receptors from polluting land uses.

a. Several industrial and otherwise intense land uses will ostensibly be allowed near sensitive receptors

Many industrial and otherwise intense land uses will be allowed in very close proximity to sensitive receptors. intense land uses, including but not limited to Motorcycle/Riding Club, Construction and Material Yards, Limited Industrial, Warehousing, Storage, and Distribution: Indoor Warehousing and Storage; Warehousing, Storage, and Distribution: Outdoor Storage; and Warehousing, Storage, and Distribution: and Wholesaling, Storage and Distribution will be allowed as close to 100 feet from a sensitive receptor with a CUP and with few other protections. As has been the case to date, CUPs will be routinely and summarily approved with little public oversight and not public hearing.[4] Areas next to sensitive receptors must be properly zoned, and the aforementioned types of classifications should not be permitted even under a CUP.

Additionally, as noted above, several uses don't fall within any of the restrictive categories included in the Overlay Zone and may be allowed within 1,000 feet of sensitive receptors. These uses include General Industrial, Intense Industrial, Agricultural Processing, Construction and Material Yards, and Building Materials and Services. These uses could intensify air, water, light, and noise pollution in addition to traffic safety concerns yet appear to be allowed as close as 100 feet from a sensitive receptor.

3. The Proposed Overlay Zone Will not Protect People from The Impacts of Warehousing and Similar Facilities that Attract Truck Traffic

The proposed Overlay Zone includes inadequate protections from the impacts of truck traffic servicing warehouses and other industrial uses. The development standards call for truck entries to be oriented away from sensitive receptors unless physically impossible.[5] There should be no such exception. If orienting entries and loading docks away from sensitive receptors is not possible, then that particular use is inappropriate. Similarly, the development standards suggest that loading docks and truck entries should be located away from sensitive receptors if feasible.[6] Again, there should be no such caveat. It's critical for health and safety considerations such standards be in place. Finally, the proposed development standards only require a 300 foot buffer

[4] City of Fresno Code of Ordinances: Part V, Article 49, Sec. 15-4904 (J)(L). Article 50, Sec. 15-4904 (M) and Table 15-4907
[5] Draft SCSP pg 73
[6] Id

for warehouses that are larger than 400,000 square feet.[7] Not only is a 300 foot buffer inadequate given the impacts of truck idling and queueing on sensitive receptors, but a standard buffer should not be limited to only massive facilities.

D. The Proposed Land Use Plan Does Not Address Existing Needs Including the Beed for Neighborhood Mixed Used Zoning and Parks

The Draft SCSP fails to adequately incorporate recommendations of people who live in the plan area. Residents of the South Central neighborhoods recommended less industrial uses, but also recommended more community-serving amenities, more parks and green space, and more housing.

The Plan's allocation of land for parks falls far short of recommended park space. In fact the draft plan only designates 3 acres for a park and that land is at the far edge of the plan area, leaving the majority of the planning area far from any hope of a park or recreational space. Community members have repeatedly asked for more trees to create a better tree canopy to reduce heat island impacts. Insultingly, the development standards do not require any trees to be planted except for saplings that don't reach their maturity until 10 years later.

Despite a call for more community-serving amenities, housing, and pedestrian-friendly retail opportunities that would best be fulfilled through Neighborhood Mixed Use zoning, there is virtually no such zoning in the entire plan area. Instead the plan allocates almost all non-residential uses to industrial and business park zones along with some General Commercial zones which the draft plan itself describes on page 56 as not necessarily compatible with "other areas because of higher volumes of vehicle traffic and potential adverse impacts on other uses".

Unfortunately, despite the articulated desire for more housing and mixed use development in the area, including near Orange Center Elementary school, residents are seeing more and more land gobbled up for industrial uses, making residential development more and more untenable. This plan could reverse that harmful trend if corrected.

E. The proposed land use and circulation plan does not protect the safety of pedestrians and cyclists in the plan region.

Community residents have consistently and repeatedly voiced their concerns about the lack of safety for pedestrians and cyclists in the SCSP area as a result of significant heavy duty truck and employee traffic from distribution and industrial facilities in the plan area. In fact, the SCSP notes that "there are many locations that lack bikeways and sidewalks or that have

[7] Draft SCSP pg 73 Developmental Regulation

sidewalks gaps between development" and goes on to state that "inconsistent bicycle and pedestrian networks contribute to an unsafe and uninviting environment for pedestrians and cyclists."[8]

While the SCSP states that it incorporates relevant portions of multiple transportation planning documents and identifies *planned* bicycle, trail, and sidewalk networks, it completely fails to identify how planned network investments will actually be funded and fully realized. Furthermore, SCSP does not commit to or identify any actions the City will take to ensure timely implementation in the circulation or implementation chapters of the SCSP. It excuses any commitments by noting that improvements can only be made if they are feasible and within city limits with no acknowledgement to address bikeway and sidewalk infrastructure deficiencies for areas within the city's sphere of influence[9].

With respect to public transit, the SCSP points to existing transit services and planned service extension to support the North Pointe Business Park but does not analyze transit service deficiencies nor identify transit improvement for residents living within the SCSP area. Additionally, the circulation chapter discusses the Clean Shared Mobility Network, which is entirely a Southwest Fresno Specific Plan Transformative Climate Communities (TCC) project that lies within the Southwest Fresno Specific Plan and it does not infiltrate nor directly benefit South Central Fresno community members. The Clean Shared Mobility Network project should not be mentioned in the SCSP unless the City plans and commits to duplicate the project and its benefits of a mobility network within the community of South Central. To state that this Clean Shared Mobility Network adjoins the SCSP as if it will benefit South Central is a farce because none of the project's services are within the SCSP area.

With respect to traffic calming, the SCSP offers no analysis as to the traffic calming needs of the Plan area to protect pedestrians and bicyclists, The SCSP only proposes the City should consider traffic claiming studies and to seek funding for traffic calming *studies after* the SCSP is adopted which is unacceptable.

Insultingly, the circulation chapter identifies construction of the SR 99 South Fresno Corridor on American and North Avenues as a project that will improve traffic operations and safety at the interchanges and on intersecting and nearby local streets resulting in lower air emissions on the local road system and improved access for businesses in the Plan Area.[10] Community opposition to the SR 99 South Fresno Corridor project is well documented and residents have repeatedly called on the local, state, and federal agencies to rescind project approval due to significant air quality impacts of the proposed project. Most recently, public

[8] Draft SCSP, page 81
[9] Draft SCSP, page 81
[10] Draft SCSP, page 93

comments were submitted to the Federal Highways Administration documenting the disastrous impacts to the health and well benign of South Fresno neighborhoods, including those within the SCSP area, should the project move forward. Those comments are incorporated herein (and included as Attachment 3).

Lastly, as noted in Section II. B of our comments, the truck reroute study is inadequate and truck traffic will intensify in the SCSP area.

F. Implementation of the Plan's Policy Framework is Unclear and Ambiguous

The policy and implementation framework found in Chapters 3 and 8 of the draft plan fail to include enforceable, timely, and meaningful policies and implementation actions. Proposed policies across categories are vague, unenforceable, and will not result in reduced pollution exposures near sensitive receptors in the Plan Area. A few notable examples include:

T-6 - Help school districts implement a "safe routes to school: " program;

T-7 Build, repair, and maintain roads in good conditions;

T-12 Consider a funding mechanism to pre-fund infrastructure improvements, prior to allowing development to occur;

AQ-2 Request additional 24-hour air monitors from the San Joaquin Valley Air Pollution Control District around distributions centers, major roads near distributions centers, and at receptive school districts;

N-2 Identify noise-impacted areas in the Plan Area;

EGB-3 Encourage installation go solar panels, battery storage, and zero-emission backup electricity generators at distribution centers;

W-2 Implement a periodic water quality testing program in areas where contamination has been an issue;

W-6 Seek funding to expand water facilities ato neighbors within the Plan Area;

E-10 Prioritize hiring local residents;

PN-1 Establish new noticing requirements for all project types;

CBD-1 Consider a Community Benefit Fund to pay for measures such as air filtration systems, dual-paned windows, parks, job training programs, and job fairs near the Plan Areas.

Several of the proposed policies mentioned above fail to include a timeline for implementation, identify responsible city departments, identify secured funding sources to implement, and a plan for enforcement. Additionally, the SCSP states that "implementations of policies are subject to available resources, staff capacity and availability, funding, and priorities of decision makers among other things"[11], thereby rendering proposed policies and implementation actions meaningless.

III. The Draft South Central Specific Plan is Inconsistent with Local and State Policy Goals and Mandates

A. The SCSP is Inconsistent with the Goals, Strategies, and Overall Intent of the AB 617 South Central Fresno Community Emission Reduction Plan

AB 617 initiated a state-wide effort to monitor and reduce air pollution, and improve public health, in communities that experience disproportionate burdens from exposure to air pollutants through new community-focused and community-driven actions.[12] After an extensive public engagement process and the San Joaquin Valley Air Pollution Control District's (Air District) own comprehensive identification and prioritization analysis, the South Central Fresno neighborhood was recommended by the Air District Governing Board and selected by the California Air Resources Board (CARB) as a first-year community for the development of a community air monitoring plan and emission reduction plan to reduce pollution impacts due to the area's high cumulative air pollution exposure burden. [13] The SCSP area is within the boundaries of the AB 617 South Central Fresno Region and thus subject to the goals and strategies within the adopted community emission reduction plan (CERP). (Please find included as Attachment 4 a map showing the boundaries of the City of Fresno, the boundaries of the City of Fresno's sphere of influence, the boundaries of the AB 617 South Central Fresno Region, and the boundaries of the South Central Specific Plan)

As noted in the CERP, top community sources of concern include heavy duty trucks, land use and industrial development, and industrial processing in the plan area. [14] To address these concerns, the CERP includes several strategies intended to reduce high cumulative air

[11] Draft SCSP, page 135
[12] 2019 South Central Fresno Community Emission Reduction Plan https://community.valleyair.org/media/kx2gz0h4/01finalscfresnocerp-9-19-19.pdf
[13] 2019 South Central Fresno Community Emission Reduction Plan https://community.valleyair.org/media/kx2gz0h4/01finalscfresnocerp-9-19-19.pdf
[14] 2019 South Central Fresno Community Emission Reduction Plan https://community.valleyair.org/media/kx2gz0h4/01finalscfresnocerp-9-19-19.pdf

pollution exposure including but not limited to incentive programs for heavy duty truck replacement with zero and near zero emission technology; reducing idling of heavy duty trucks within the community; installation of electric charging infrastructure at distribution center, warehouse, and other types of freight facilities where heavy duty diesel trucks are loaded or unloaded; a heavy duty truck rerouting study which is now pending before the city; supporting projects that reduce vehicle miles traveled to promote active transportation and increase the walkability of community neighborhoods; increased coordination with the City and County on land use planning, permitting and CEQA processes to minimize impact on air quality; increased urban greeting and forestry to improve air quality; and installation of vegetative barriers around and near sources of concern.[15]

The CERP is unequivocal that its purpose is to reduce pollution in the designated south Fresno area. While the Air District leads CERP implementation, the City has a critical role in supporting CERP implementation and emission reduction. As noted above, the proposed land uses and development standards in the draft SCSP will facilitate significant increases in intense and polluting uses near and impacting sensitive receptors within the AB 617 South Central Fresno region thereby undermining community-led, SJVAPCD, and CARB efforts to improve air quality and reduce pollution exposure in the region.

B. The SCSP is Inconsistent with the Goals and Projects of the City of Fresno's Transform Fresno Initiative.

In 2016, the City of Fresno was awarded a $70 million Transformative Climate Community (TCC) program grant by the California Strategic Growth Council for Southwest, Downtown and Chinatown areas of Fresno. AB 2722, which created the TCC program, calls for investment in areas that have a high proportion of census tracts identified as disadvantaged communities and that focus on communities that are most disadvantaged.[16] The goals of the TCC program are to invest in community-led climate resilience projects in California's most disadvantaged communities. The program aims to achieve these goals through a combination of community-driven climate projects to improve public health and the environment, to strengthen the economy through community serving projects, and to reduce greenhouse gas emissions[17].

A historic and unprecedented participatory process led to the identification of a series of projects that would result in significant environmental and economic benefits to the Chinatown,

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[15] 2019 South Central Fresno Community Emission Reduction Plan, pp 46- 126 https://community.valleyair.org/media/kx2gz0h4/01finalscfresnocerp-9-19-19.pdf

[16] Bill Text: AB 2722 Transformative Climate Communities, Chapter 371, Section 1 Part 4 of Section 75240 of Division 44 of the Public Resources Code

[17]Transformative Climate Communities Fact Sheet: https://sgc.ca.gov/grant-programs/tcc/docs/20231218-TCC_Fact_Sheet.pdf

Downtown, and Southwest Fresno neighborhoods.[18] Funded projects and programs include but are not limited to clean mobility options, urban greening and increased park space, infrastructure to support neighborhood serving amenities, community gardens, affordable housing, and rooftop solar – all intended to provide environmental and health benefits to communities most disproportionately impacted and reduce greenhouse gasses.[19]

The Transform Fresno investment area is within the AB 617 South Central Fresno boundary and adjacent to the SCSP area. Combined with strategies in the South Central Fresno CERP, Transform Fresno seeks to improve environmental and health conditions in the very same neighborhoods that will be negatively impacted by the SCSP. Air quality knows no boundaries, and if approved as is, the SCSP will also undermine local and state efforts to build community and climate resilience.

C. The Plan Fails to Adhere to the Mandates of the City of Fresno's Resolution Calling for the Development of the Plan

On November 14, 2019, the Fresno City Council passed resolution 2019-23 directing City staff to develop land use designations, zoning, and policies to protect sensitive uses in the SCSP area from the impacts of industrial development and to engage in other planning activities to ensure the extension of essential infrastructure and services to unincorporated SCSP neighborhoods in the City's development trajectory and engage residents' in crafting economic development strategies and policies reflective of residents' priorities for economic mobility and business investment in local communities (Attachment 5: Resolution 2019-235). Specifically, the resolution provides that the City "wishes to obtain input from residents" "to develop a vision, land use changes, and policies that...avoid and minimize impacts to existing sensitive land uses from new development and ensure a decent quality of life and a healthy environment for residents of existing neighborhoods and communities within and near the [SCSP area]." p. 2. The resolution repeatedly emphasizes the City's intention that SCSP residents inform the SCSP's policies and land use designations, stating that the plan's land use policies should be "reflective of community input," and that residents and stakeholders "shall inform the [SCSP] to the greatest extent feasible, through an inclusive community engagement process." p. 2.

The SCSP does not conform with the mandates outlined in the City's own resolution.

1. The SCSP Does not Adequately Reduce Intensity of land uses or Include New Land Use Designations

[18] https://www.transformfresno.com/about/
[19] https://www.transformfresno.com/projects/

The plan is also not aligned with Resolution 2019-235, which states that the SCSP plan incorporates reductions in the zoning intensity near sensitive uses to provide buffers to protect sensitive uses from adverse impacts from more intense land uses in a manner that reflects stakeholder input. The resolution also states that the Mayor and city council desire new land use designations, policies and implementation actions specific to the plan area, and incorporate relevant environmental mitigation measures reflective of community input and the analysis prepared for the Environmental Impact Review.

The reduction in zoning from Heavy or Light Industrial to Regional and Business Park which would still allow intense industrial and polluting uses does not meet this required component of the resolution for the reasons noted above. Furthermore, the plan contains no new land use designations that would reduce pollution impact and intensity of industrial uses, invest in neighborhood serving amenities and services, and promote pedestrian safety and walkability as repeatedly requested by community residents throughout the plan development process.

2. The Draft SCSP Does Not Adequately Incorporate Input From Community-based Stakeholders

Resolution 2019-235 also states that the SCSP must be informed by stakeholder input. And yet the Draft SCSP largely ignores many of the priorities and recommendations community members raised.

Community members recommended a significant reduction in industrial land uses. The Draft SCSP largely ignores this recommendation, instead swapping in Business Park for Industrial zones which allow many of the same polluting uses. If anything, this change misleads and misinforms community stakeholders rather than incorporating the recommendations. For reduced industrial uses.

Community stakeholders also recommended increased housing and neighborhood mixed uses zonings to address the need for housing and neighborhood serving retail. Unfortunately, the draft plan provides virtually no Neighborhood Mixed Use.

Finally, community members recommended additional park space and walking and biking paths. The Draft SCSP falls far short of providing land requisite to address the need for parks in the neighborhood and fails to make the necessary commitments to update pedestrian and bike safety and infrastructure.

In short, the City failed to live up to its mandate to incorporate stakeholder input - or at least community input - into the Draft SCSP.

D. The Draft SCSP Fails to Align with the City of Fresno's General Plan Goals and Policies

The ongoing industrialization of the the SCSP area contradicts and is not in alignment with the General Plan's goals of promoting healthy communities[20] and improving public health and safety.[21] The draft SCSP is also not in alignment with the General Plan's Environmental Justice Goal A which states that, "...related to land use planning… ensure new developments do not disproportionately burden disadvantaged communities. To ensure 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 do not disproportionately impact any individual race, any culture, income or education level."[22]

IV. Recommendations

A. Ensure Effective Public Engagement in The Development of the Final SCSP

Despite the City's own call for ongoing community engagement in the development of the SCSP (through Resolution 2019-235) the City failed to meaningfully engage impacted people and seek feedback on the Draft SCSP. We are hopeful that the City incorporates all of the substantive changes recommended below, but regardless, more engagement will be necessary before plan adoption to ensure inclusion of all impacted neighborhoods.

B. Recommended Changes to the Draft South Central Specific Plan

The City should redraft the SCSP based on recommendations included in the Community Plan Alternative, included in additional community engagement as recommended above, and included herein to promote health, safety, equitable access to amenities, and to align with City and State policies and mandates. We've summarized the recommendations below and look forward to working with you to incorporate and implement the following land use and policy changes.

[20] Draft SCSP, page 13, goal number 9
[21] Draft SCSP, page 15, goal number 15
[22] Id.

We recommend the following changes to the Land Use Map to ensure that sensitive receptors are protected from some of the harshest impacts of increased industrialization and intensification of land use:

- Eliminate Industrial Zoned Land within one half mile of sensitive receptors or land zoned for sensitive receptors
- Shift Industrial Zoned Land to Business Park, Commercial General or Neighborhood Mixed Use subject to the recommendations below
- Change land that is currently zoned General Commercial to Neighborhood Mixed Use in areas that would allow a half mile buffer between the NMX use and existing industrial uses
- Change land that is currently zoned Industrial or Business Park to Neighborhood Mixed Use in areas that would allow a half mile buffer between the NMX use and industrial uses
- Increase park acreage by at least 10 acres to address the need for parks, playgrounds, and recreational areas in the plan area

We recommend inclusion of the following transportation and circulation policies:

- Eliminate truck routes that pass within 1,000 feet of sensitive receptors
- Implement UC Merced's Health Impact Assessment's recommendations of developing truck routes outside of the 1,000 foot buffer and even further away when considering more vulnerable populations; any new and future truck routes must be designed to avoid locations where people live, work and play.
- Set enforceable timelines for implementation of pedestrian safety plans and traffic calming measures, including but not limited to:
    - Construction of Class I bike routes
    - Construction of walking and bike paths on canal banks
    - Construction of complete streets
- Coordinate with residents and law enforcement entities to enforce truck routes and other traffic calming and traffic safety measures

We recommend the following policy changes to the proposed overlay zone:

- Prohibit intensive land uses and / or land uses that attract heavy duty truck traffic within a half mile of a sensitive receptor or an area zoned for a sensitive receptor. Such uses include but are not limited to general industrial, intense industrial, limited industrial, warehousing, service station, shooting / archery range, salvage and wrecking, freight / truck terminals and warehouses, waste transfer facility, mining and quarrying, motorcycle / riding club, construction and material yards, building materials and services, communications facilities within buildings, and agriculture processing and agricultural services.

- Require a CUP for any of the following uses in the plan area and require public notice and a public hearing prior to CUP approval: general industrial, intense industrial, limited industrial, warehousing, service station, shooting / archery range, salvage and wrecking, freight / truck terminals and warehouses, waste transfer facility, mining and quarrying, motorcycle / riding club, construction and material yards, building materials and services, communications facilities within buildings, and agriculture processing and agricultural services.
- Require that all loading docks at warehousing facilities and similar facilities are oriented away from sensitive receptors and eliminate discretion to override the requirement
- Require a half mile set-back from dock-doors to sensitive receptors
- Prohibit expansion, modification, and intensification of existing and new industrial uses in the SCSP area boundaries unless they meet all technologically feasible components of development standards laid out in the City's Development Code, including but not limited to requirements related to set-backs, landscaping, screening, ingress and egress standards, queuing standards, dock door orientation, and buffer zones.
- Require local hiring practices and standards to ensure that residents of the Planning Area and adjacent neighborhoods have access to job and career opportunities that result from plan implementation.

We recommend that the following additional policies be incorporated into the City's Development Code upon its adoption:

- Require extension of water and wastewater service to any residents living in or adjacent to the City's sphere of influence who opt for municipal water and wastewater service
- Require fire suppression systems in businesses that pose high risk of fires including businesses that produce pallets, chemicals, and other flammable materials.
- Require businesses that pose great fire risk to provide nearby sensitive receptors with military grade gas/respirator masks for the population of school staff/faculty/ and students for emergency use during an active fire
- Require the creation of a Community Benefit Fund (CBF) to fund home and neighborhood level improvements and facilitate job and career opportunities for residents of the plan area. Additionally, require all industrial developments to contribute funds to the CBF.

* * * *

Thank you for your consideration of these comments and recommendations. We look forward to working with you, and other stakeholders, to create a South Central Specific Plan that matches the potential of South Fresno neighborhoods to thrive.

Sincerely,

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Leadership Counsel for Justice and Accountability

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Superintendent, Orange Center Elementary School District

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Nayamin Martinez
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APPENDIX B
City Council Resolution 2019-235

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RESOLUTION NO. 2019-235

A RESOLUTION OF THE COUNCIL OF THE CITY OF FRESNO, CALIFORNIA, IN SUPPORT FOR COMMUNITY ENGAGEMENT IN THE SOUTH CENTRAL SPECIFIC PLAN ENVIRONMENTAL IMPACT REPORT

WHEREAS, the City desires to engage in public outreach to assist in determining potential revisions to the draft Specific Plan for the South Central Specific Plan (SCSP), which may also include incorporation of relevant mitigation measures as part of the proposed Specific Plan ; and

WHEREAS, the City has begun work on an Environmental Impact Report (EIR) for the development of the SCSP; and

WHEREAS the SCSP boundaries are depicted in Figure IM-1 of the General Plan, a copy of which is attached hereto as Exhibit A; and

WHEREAS, the draft SCSP is a compilation of certain policies from existing City plans; and

WHEREAS, the SCSP encompasses and adjoins incorporated and unincorporated residential neighborhoods and communities, as well as elementary schools and religious institutions; and

WHEREAS the neighborhoods and communities within and adjacent to the SCSP are impacted by high levels of pollution, poverty, and unemployment and a lack of high-quality jobs with opportunities for career advancement; and

WHEREAS, disadvantaged unincorporated communities, and neighborhoods located within and adjacent to the SCSP lack basic municipal infrastructure; and

Date Adopted: 11/14/2019
Date Approved: 11/20/2019
Effective Date: 11/20/2019

WHEREAS, the General Plan Land Use and Circulation Map applies the Heavy Industrial land use designation to parcels occupied by and adjacent to residential, elementary school, religious, and commercial land uses; and

WHEREAS, the City wishes to obtain input from residents who live within and near the SCSP and other key stakeholders to inform development of the specific plan in order to develop a vision, land use changes and policies that: 1) avoid and minimize adverse impacts to existing sensitive land uses from new development and ensure a decent quality of life and a healthy environment for residents of existing neighborhoods and communities within and near the SCSP; 2) As a separate process to be conducted in 2020, study standards, and procedures for annexation of existing neighborhoods and communities in and near the SCSP and goals and performance measures for the extension of municipal infrastructure and services to these neighborhoods and communities; and 3) facilitate and promote economic development that advances community priorities relating to industry type, employment opportunities, job quality and community benefits; and

WHEREAS, the City desires that the specific plan be referred to as the South Central Specific Plan (SCSP).

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Fresno as follows:

1. The Mayor and City Council of Fresno desire that the Specific Plan shall strongly consider and may incorporate reductions in the zoning intensity of undeveloped lands near to sensitive uses such as residences, schools and religious institutions in order to provide "buffers" to protect sensitive uses from adverse impacts from more

intense land uses in a manner that reflects stakeholder input.

2. The Mayor and City Council of Fresno also desire that the plan include new land use designations, policies and implementation actions specific to the plan area, and incorporate relevant environmental mitigation measures reflective of community input and the analysis prepared for the Environmental Impact Review.

3. The City desires that residents and stakeholders in and adjacent to the plan area shall inform the South Central Specific Plan, through an inclusive community engagement process. The community engagement process will include community meetings held before, during and after development of a draft specific plan. Community residents and stakeholders shall have an opportunity to review and provide feedback of draft documents, including but not limited to proposed land use designations and policy and implementation actions specific to the plan area. If determined feasible by the ad hoc committee, an advisory committee will be established and comprised of residents who live within and near the SCSP and key community stakeholders. A draft final Plan document shall be reviewed and considered for approval prior to Planning Commission and City Council action at a noticed public meeting.

4. The City desires the assistance of a qualified consultant with the capacity and expertise to conduct the community engagement and long-range planning specific herein in a high-quality manner. In consultation with the impacted Councilmembers, the City shall select a consultant to perform these tasks.

5. The Mayor and City Council of Fresno also desire that the current draft plan may be revised to include proposed new land use designations and/or policies specific to the plan area and incorporate relevant environmental mitigation measures

reflective of community input and the analysis prepared for the Environmental Impact Review.

6. Council authorizes the City Manager to expend $250,000, in addition to the original amount authorized for the contract, and/or hire additional consultants, to fulfill the scope of work outlined herein.

* * * * * * * * * * * * * * * *

STATE OF CALIFORNIA)
COUNTY OF FRESNO) ss.
CITY OF FRESNO)

I, YVONNE SPENCE, City Clerk of the City of Fresno, certify that the foregoing resolution was adopted by the Council of the City of Fresno, at a regular meeting held on the 14th day of November, 2019.

AYES : Arias, Bredefeld, Chavez, Esparza, Karbassi, Soria, Caprioglio
NOES : None
ABSENT : None
ABSTAIN : None

Mayor Approval: November 20th, 2019
Mayor Approval/No Return: N/A, 2019
Mayor Veto: N/A, 2019
Council Override Vote: N/A, 2019

YVONNE SPENCE, MMC CRM
City Clerk

By: Yvonne Spence 11/22/19
Deputy Date

APPROVED AS TO FORM:
DOUGLAS T. SLOAN
City Attorney

By: 11/22/19
Brandon M. Collet Date
Senior Deputy

November 15, 2019

Council Adoption: 11/14/19
Mayor Approval:
Mayor Veto:
Override Request:

TO: MAYOR LEE BRAND

FROM YVONNE SPENCE, MMC
City Clerk

SUBJECT: TRANSMITTAL OF COUNCIL ACTION FOR APPROVAL OR VETO

At the City Council meeting of 11/14/19, Council adopted the attached Resolution No. 2019-235, entitled **In support of community engagement in the South Industrial Priority Specific Plan.** Item 4-A (2), File ID19-11527, by the following vote:

Ayes	:	Arias, Bredefeld, Caprioglio, Chavez, Esparza, Karbassi, and Soria
Noes	:	None
Absent	:	None
Recused	:	None

Please indicate either your formal approval or veto by completing the following sections and executing and dating your action. Please file the completed memo with the Clerk's office on or before November 25, 2019. In computing the ten day period required by Charter, the first day has been excluded and the tenth day has been included unless the 10th day is a Saturday, Sunday, or holiday, in which case it has also been excluded. Failure to file this memo with the Clerk's office within the required time limit shall constitute approval of the ordinance, resolution or action, and it shall take effect without the Mayor's signed approval

APPROVED/NO RETURN: _____

VETOED for the following reasons: (Written objections are required by Charter; attach additional sheets if necessary.)

_____

_____

_____ Date: 11-20-19
Lee Brand, Mayor

COUNCIL OVERRIDE ACTION: Date: _____

Ayes	:
Noes	:
Absent	:
Abstain	:

RECEIVED
2019 NOV 20 P 3:52
CITY OF FRESNO
CITY CLERK'S OFFICE

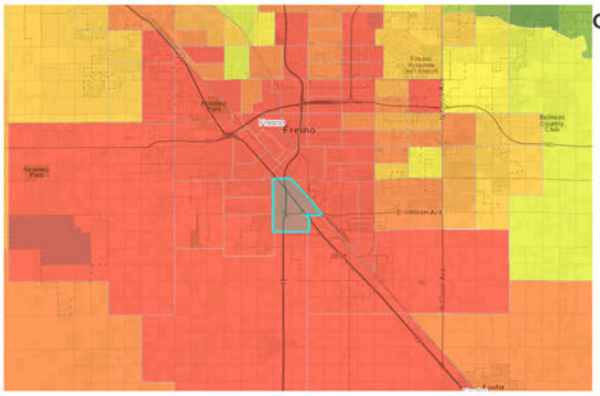
SCSP_CES

Legend

CalEnviroScreen 4.0 Results

- > 90 – 100 (Highest Scores)
- > 80 – 90
- > 70 – 80
- > 60 – 70
- > 50 – 60
- > 40 – 50
- > 30 – 40
- > 20 – 30
- > 10 – 20
- 0 – 10 (Lowest Scores)

CalEnviroScreen 4.0 High Pollution, Low Population



Census Tract: 6019001100 (Population: 2,780)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6019001100 relative to other census tracts.

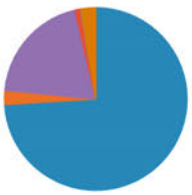
Overall Percentiles	
CalEnviroScreen 4.0 Percentile	100
Pollution Burden Percentile	100
Population Characteristics Percentile	100

Exposures	
Ozone	82
Particulate Matter 2.5	98
Diesel Particulate Matter	99
Toxic Releases	92
Traffic	60
Pesticides	43
Drinking Water	84
Lead from Housing	96

Environmental Effects	
Cleanup Sites	98
Groundwater Threats	91
Hazardous Waste	96
Impaired Waters	0
Solid Waste	80

Sensitive Populations	
Asthma	97
Low Birth Weight	96
Cardiovascular Disease	92

Socioeconomic Factors	
Education	93
Linguistic Isolation	79
Poverty	99
Unemployment	94
Housing Burden	91



Race/Ethnicity Profiles

Hover your mouse over the pie chart segment to see the race/ethnicity in percentages and approximate counts.

Age Profiles

Hover your mouse over the pie chart segment to see the age characteristics in percentages and approximate counts.

Census Tract	Total Population	California County	ZIP	Approximate Location	Longitude	Latitude	CES 4.0 Score	CES 4.0 Percentile	CES 4.0 Percentile Range	Ozone	Ozone Pctl	PM2.5	PM2.5 Pctl	Diesel PM	Diesel PM Pctl	Drinking Water	Drinking Water Pctl	Lead	Lead Pctl	Pesticides	Pesticides Pctl	Tox. Release	Tox. Release Pctl	Traffic	Traffic Pctl	Cleanup Sites	Cleanup Sites Pctl	Groundwater Threats	Groundwater Threats Pctl	Haz. Waste	Haz. Waste Pctl	Imp. Water Bodies	Imp. Water Bodies Pctl	Solid Waste	Solid Waste Pctl	Pollution Burden	Pollution Burden Score	Pollution Burden Pctl	Pollution Burden Score	Asthma	Asthma Pctl	Low Birth Weight	Low Birth Weight Pctl	Cardiovascular Disease	Cardiovascular Disease Pctl	Education	Education Pctl	Linguistic Isolation	Linguistic Isolation Pctl	Poverty	Poverty Pctl	Unemployment	Unemployment Pctl	Housing Burden	Housing Burden Pctl	Pop. Char.	Pop. Char. Score	Pop. Char. Pctl
6.039E+09	2780	Fresno	93706	Fresno	-119.7816961	36.7096952	93.18	100.00	95-100% (highest score)	0.060	82.48	13.906348	97.71	1.123	98.72	733.95	84.39	89.60	96.47	1.00	42.90	4859.094604	90.20	1037.096	60.38	70.5	98.19	54.25	91.37	3.1	96.31	0	0.00	6	95.95	77.08	10.45	95.42	64.58	100.00	64.58	100.00	99.93	129.54	97.22	7.8	85.62	60.25	21.47	92.25	44.5	93.23	10	79.37	76	98.92	12.8	93.83	30.3	91.04	93.16	9.66	99.72
6.077E+09	4680	San Joaquin	95206	Stockton	-121.2878729	37.9431727	86.65	99.99	95-100% (highest score)	0.046	84.98	11.884085	72.59	0.538	91.15	389.85	41.55	77.30	86.83	63.13	73.66	519.6280009	52.35	856.3959	48.29	61.9	97.46	78.6	95.09	1.27	88.58	13	91.87	9.25	89.28	73.43	8.97	99.29	105.88	94.22	6.88	88.72	20.26	88.12	46.4	94.47	29.7	78.75	8.3	104.58	38.8	67.25	6.3	60.57	25.2	80.75	78.46	8.14	90.85
6.037E+09	2751	Los Angeles	90023	Los Angeles	-118.1974975	34.0175004	90.04	99.97	95-100% (highest score)	0.044	53.73	12.25164	89.21	0.781	96.55	787.94	92.53	92.56	98.40	0.00	0.00	3682.691378	87.79	2522.422	92.84	38.75	92.96	20.5	68.92	11.62	99.66	7	66.74	4.85	73.08	77.67	9.48	99.86	76.1	82.76	7.11	90.89	20.87	90.15	52.2	97.28	17.1	83.55	62.6	93.39	6.4	61.53	20.3	63.97	83.75	8.65	95.79
6.059E+09	3664	Fresno	93706	Fresno	-119.8277069	36.7343353	81.33	99.96	95-100% (highest score)	0.060	82.48	13.520919	95.88	0.174	57.09	733.95	84.39	68.39	77.00	44.57	71.59	1630.342707	74.93	690.5022	35.28	10.6	76.32	16.5	77.32	9.5	44.83	2.36	94.12	0	0.00	5.75	78.14	67.85	8.28	97.40	139.45	98.24	10.65	99.78	22.68	94.57	41.4	90.94	15.7	78.15	65.7	95.35	15.7	97.35	35.4	96.41	94.64	9.82	99.89
6.059E+09	2689	Fresno	93706	Fresno	-119.8050044	36.7354914	78.25	99.95	95-100% (highest score)	0.060	82.48	13.818959	97.47	1.399	99.30	733.95	84.39	75.41	85.12	16.63	64.41	1975.207988	78.96	909.6509	52.16	22.65	94.64	28.25	78.05	0.35	56.40	0	0.00	0	0.00	74.64	6.44	99.04	139.08	98.17	10.25	99.67	22.64	94.43	43.6	92.57	20	86.56	72.7	98.30	11.8	92.04	34.6	96.06	94.96	9.66	99.95
6.037E+09	3306	Los Angeles	90221	Compton	-118.2124134	33.881969	80.71	99.94	95-100% (highest score)	0.043	29.89	12.25258	89.22	0.520	90.64	459.74	55.31	91.09	97.49	0.41	36.07	12491.99626	98.36	1480.521	77.66	19.4	81.30	53.3	91.00	12.90	99.74	10	82.97	5.5	77.62	76.44	9.33	99.78	86.77	88.60	6.28	80.04	22.2	84.47	33.1	83.57	NA	NA	43.5	74.05	0.3	83.22	23.7	76.35	83.37	8.65	95.46
6.059E+09	4255	Fresno	93706	Fresno	-119.8040114	36.6977507	93.55	99.93	95-100% (highest score)	0.060	82.48	13.553797	96.02	0.097	39.69	790.10	92.69	65.01	72.90	1321.97	90.83	3178.098409	85.48	2412.723	91.92	5.70	15.45	75.38	20	68.42	0.56	72.97	0	0.00	0	0.00	75.67	66.35	8.10	96.70	136.35	98.23	8.76	98.40	22.68	94.57	44.2	92.99	21.7	88.70	79.5	99.41	15.4	97.54	33.3	94.83	91.84	9.54	99.99
6.038E+09	5124	Los Angeles	90220	Compton	-118.230032	33.8798617	79.29	99.91	95-100% (highest score)	0.041	26.70	12.21666	88.64	0.376	83.17	459.20	55.16	91.35	97.71	1.66	46.07	14883.20671	98.99	1575.355	79.60	22.5	84.21	63.5	93.08	1.785	91.83	7	66.74	1.7	43.21	73.27	8.95	99.25	114.33	95.46	6.32	80.73	18.18	81.31	43.3	92.33	9.7	60.62	56.8	88.92	12.6	93.49	29.6	89.84	85.44	8.86	96.90
6.037E+09	4561	Fresno	93725	Unincorporated Fres	-119.7410273	36.7010849	76.17	99.90	95-100% (highest score)	0.061	84.58	13.884284	97.65	0.000	0.00	733.95	84.39	60.36	67.63	8.99	59.45	2565.230791	83.68	448.5941	16.60	11.15	89.58	11.15	69.58	1.205	87.60	7	66.74	0.5	33.28	71.65	8.79	98.37	83.28	76.65	5.84	69.25	19.43	82.24	39.2	89.62	7.2	52.12	16.3	57.90	38.8	97.61	10.8	72.76	87.24	9.34	99.97
6.037E+09	3688	San Joaquin	95202	Stockton	-121.2853628	37.9539996	77.87	99.89	95-100% (highest score)	0.046	84.98	11.875729	72.20	0.520	90.63	389.85	41.55	79.35	88.71	16.09	63.93	369.7826741	45.55	287.4575	7.61	54	96.58	75.85	94.92	1.32	89.04	2	23.88	9	88.93	64.15	7.83	95.22	238.03	99.96	9.72	99.36	26.57	89.13	48.6	95.79	24	91.39	78.8	99.31	14.6	96.49	33.1	94.64	85.83	8.94	99.97
6.037E+09	2000	Los Angeles	90033	Los Angeles	-118.2077883	34.0588723	77.35	99.87	95-100% (highest score)	0.049	59.69	12.5767875	91.57	1.053	98.41	798.87	93.57	74.68	84.31	0.00	0.00	1894.993347	78.08	2125.866	88.83	10.1	87.50	47.55	89.41	2.09	92.80	7	66.74	0.75	47.55	84.91	9.07	99.65	91.87	0.5	22.08	74.46	9.09	99.45	6.16	78.36	13.45	57.13	52.1	97.33	28.4	94.87	71.7	97.95	11.9	91.94	28.3	87.49	82.01	8.51	94.49
6.037E+09	3640	Los Angeles	90063	Los Angeles	-118.2862709	34.0377396	82.35	99.86	95-100% (highest score)	0.041	24.88	12.0660663	83.95	0.704	94.87	907.08	805.57	94.06	96.07	74.22	86.50	74.14	19.5774	78979	92.26	32.1	94.06	34.55	94.25	7.28	98.84	16	96.26	4.2	70.99	78.08	10.00	99.77	81.56	74.05	10.00	99.99	64.77	74.05	11.77	97.43	22.4	89.62	72.2	98.13	16.3	97.90	38.8	97.98	31.6	92.76	26.1	82.79	86.57	8.94	99.98
6.037E+09	1949	Los Angeles	91733	South El Monte	-118.0651222	34.0572154	76.91	99.85	95-100% (highest score)	0.051	71.66	12.0041768	78.44	0.551	91.56	821.08	95.28	91.11	97.54	0.01	12.21	2234.535319	81.08	1045.019	61.80	19.6	81.13	49.3	88.61	1.08	85.72	7	66.74	4.3	73.78	63.67	7.77	94.79	198.65	99.12	7.05	94.13	19.6	81.72	44.2	93.09	12.7	96.44	32.7	93.02	93.07	9.32	99.96
6.037E+09	6072	Los Angeles	90059	Los Angeles	-118.2720954	33.9327961	76.73	99.84	95-100% (highest score)	0.044	53.73	12.2329514	88.53	0.431	86.81	787.94	92.53	80.05	89.29	0.00	0.00	5622.970387	93.50	3125.283	97.79	4.5	40.84	5	52.15	32.38	100.00	7	66.74	4.5	72.39	76.87	9.23	99.61	90.67	0.5	22.08	74.46	9.42	99.49	6.42	80.26	27.88	99.23	44.7	93.48	12.4	89.79	79.5	99.41	10.3	94.96	34.3	95.64	90.14	9.03	99.98
6.037E+09	5705	Los Angeles	90011	Los Angeles	-118.2468968	34.0185256	76.65	99.82	95-100% (highest score)	0.046	46.99	12.0994605	84.39	0.565	91.89	787.94	92.53	95.59	99.57	0.00	0.00	2762.896647	83.81	832.5616	46.50	53.15	96.40	4.55	27.78	3.065	96.24	7	66.74	7.25	83.92	70.21	8.57	98.52	68.48	77.37	5.57	66.05	21.83	93.28	63.2	99.62	28.3	94.79	68.6	96.86	8.4	77.76	39.5	98.44	86.20	8.94	99.97
6.037E+09	2615	Los Angeles	90032	Los Angeles	-118.2102239	34.0244835	76.53	99.81	95-100% (highest score)	0.046	53.73	12.1222422	87.23	0.702	94.46	787.94	92.53	97.66	99.96	0.00	0.00	2607.823628	83.12	1241.14	74.6	14.1	85.16	8.6	44.16	4.16	97.45	7	66.74	2.6	62.04	72.02	8.74	98.92	93.16	0.5	22.08	74.46	9.73	99.76	8.24	84.53	27.5	98.87	43.2	92.57	12.4	89.33	73.7	98.42	10.5	94.04	40.8	98.07	75.55	94.83	9.37	99.94
6.037E+09	4225	Fresno	93706	Fresno	-119.8103347	36.726442	76.40	99.80	95-100% (highest score)	0.060	82.48	13.776059	97.36	0.693	95.22	733.95	84.39	82.05	91.09	59.94	73.38	2385.267741	81.92	641.6004	31.51	15	74.93	22.5	71.69	0.285	47.41	0	0.00	1	35.72	68.43	8.36	97.66	139.35	98.23	8.07	96.74	20.68	92.27	44.8	93.24	18.7	84.71	71.4	97.37	NA	NA	18.8	57.86	88.15	9.14	98.51
6.037E+09	2464	Los Angeles	91731	Rowland Heights	-118.0686907	34.0251	76.24	99.79	95-100% (highest score)	0.056	74.10	11.9410354	75.21	0.355	81.64	342.16	36.23	78.02	87.47	0.60	34.25	1284.601	74.95	1010.96	58.96	4.9	44.81	60.8	92.56	0.42	83.07	7	66.74	2.5	59.18	74.64	9.03	99.55	88.95	0.5	22.08	74.46	9.42	99.49	6.42	80.26	27.88	99.23	44.7	93.48	12.4	89.79	79.5	99.41	10.3	94.96	34.3	95.64	90.14	9.03	99.98
6.037E+09	1999	Los Angeles	90001	Los Angeles	-118.2649765	33.9856783	76.24	99.78	95-100% (highest score)	0.045	39.99	12.1449955	86.78	0.232	67.39	787.94	92.53	91.13	97.56	0.00	0.00	3873.586792	88.71	1052.627	61.29	127.95	99.66	44.6	88.05	0.56	72.97	0	0.00	6	79.95	67.23	8.21	98.58	92.59	0.5	22.08	74.46	9.01	99.68	7.25	83.92	27.5	98.87	43.2	92.57	12.4	89.33	73.7	98.42	9.9	93.59	33.3	94.83	91.84	9.54	99.99
6.037E+09	2031	Los Angeles	90023	Los Angeles	-118.2144511	34.0196754	90.54	99.77	95-100% (highest score)	0.044	53.73	12.1414494	90.54	0.781	96.55	787.94	92.53	94.61	98.74	0.00	0.00	2565.230791	83.68	1241.14	74.6	13.55	84.54	13.75	75.54	0.24	89.62	7	66.74	2.3	58.97	70.29	9.32	99.76	134.16	97.66	5.83	75.68	19.64	81.97	43.8	92.68	22.4	89.62	72.2	98.13	16.3	97.90	38.8	97.98	31.6	92.76	26.1	82.79	86.57	8.94	99.98
6.037E+09	1548	Los Angeles	90023	Los Angeles	-118.2119756	34.0187546	75.72	99.76	95-100% (highest score)	0.045	50.54	12.2127758	89.40	0.571	92.08	787.94	92.53	88.26	95.63	0.00	0.00	4017.540702	90.01	928.4647	53.66	58.65	97.18	20	68.42	22.47	99.97	7	66.74	6.5	81.19	74.56	9.10	99.49	76.1	82.76	5.88	72.85	20.87	90.15	59	99.14	22.4	89.62	82.3	99.62	3.3	21.11	26.1	82.79	80.19	8.32	92.71
6.037E+09	2048	San Joaquin	95203	Stockton	-121.3020724	37.9524215	75.61	99.74	95-100% (highest score)	0.045	44.98	11.6607159	64.78	0.771	96.42	389.85	41.55	64.24	71.87	148.92	79.45	477.3402059	50.66	726.7472	38.36	76.15	98.56	132.85	97.91	1.17	87.43	7	66.74	0.75	70.42	70.42	8.60	98.61	154.59	99.13	6.15	78.21	17.19	77.12	30.4	80.66	20.2	86.90	68.2	96.66	8.8	77.76	39.2	98.27	85.44	8.86	96.74
6.037E+09	1820	Los Angeles	90021	Los Angeles	-118.2477486	34.0256916	89.20	99.73	95-100% (highest score)	0.044	53.73	12.1215751	85.35	0.704	94.87	787.94	92.53	94.02	98.50	71.59	85.46	2867.9	84.32	1986.42	89.72	28.5	93.12	58.7	92.26	6.875	98.76	7	66.74	2.6	59.63	73.61	9.07	99.65	91.87	0.5	22.08	74.46	9.73	99.76	8.24	84.53	27.5	98.87	43.2	92.57	12.4	89.33	73.7	98.42	10.5	94.04	40.8	98.07	75.55	94.83	9.37	99.94
6.059E+09	5191	Fresno	93706	Fresno	-119.8042772	36.7177785	75.46	99.71	95-100% (highest score)	0.060	82.48	13.682943	96.79	0.256	71.00	733.95	84.39	63.55	70.93	2103.60	93.21	2610.47197	83.13	1472.269	84.06	11.7	84.17	16	56.13	0.03	4.12	0	0.00	0	0.00	63.64	5.52	99.24	83.28	76.65	5.84	69.25	19.43	82.24	39.2	89.62	7.2	52.12	16.3	57.90	38.8	97.61	10.8	72.76	87.24	9.34	99.97
6.037E+09	4669	Stanislaus	95380	Unincorporated Stan	-120.8838606	37.4647928	75.35	99.70	95-100% (highest score)	0.046	74.10	12.125751	85.35	0.356	81.21	856.81	96.55	53.48	56.45	6840.38	97.69	99.2162679	24.46	1063.61	63.36	58.37	97.05	14.5	65.99	0.72	81.52	0	0.00	6	83.85	64.63	8.03	98.63	84.37	77.66	8.73	98.04	54.9	97.66	27.7	77.45	18.3	84.04	54.9	97.83	10.9	89.46	20	82.83	81.37	8.64	99.87
6.059E+09	5498	Fresno	93721	Fresno	-119.7762091	36.7276563	75.30	99.68	95-100% (highest score)	0.060	82.48	13.8895115	97.69	0.674	94.87	733.95	84.39	91.92	98.08	1.75	46.59	3010.157725	86.47	1162.416	67.00	12.15	69.19	24.5	73.97	2.39	94.20	0	0.00	0.5	22.08	71.96	8.79	98.98	106.01	94.24	6.12	77.55	18.98	84.18	41.5	91.03	14.3	75.53	68.8	96.93	17.8	98.61	34.8	96.03	94.17	9.84	99.99
6.037E+09	3900	South Gate	90280	South Gate	-118.1782284	33.9447778	83.02	99.67	95-100% (highest score)	0.043	29.89	12.1268551	84.39	0.702	94.46	733.95	84.39	93.14	98.73	0.00	0.00	2607.823628	83.12	1241.14	74.6	109.1	99.54	55.55	91.57	4.99	97.95	7	66.74	4.6	74.16	77.29	8.97	98.94	92.83	0.5	22.08	74.46	9.88	99.17	7.25	83.92	17.7	79.51	54.1	97.55	14.5	84.46	74.8	98.57	11.3	92.53	31.6	94.25	84.52	8.84	99.96
6.037E+09	3131	Los Angeles	91331	Los Angeles	-118.4005905	34.2552325	74.58	99.66	95-100% (highest score)	0.047	59.69	11.228496	57.21	0.576	92.20	726.64	83.13	73.82	83.38	0.00	0.00	758.059672	59.58	785.0713	43.09	43.2	94.58	31.5	90.57	1.585	90.85	4	43.78	18.2	97.71	70.78	8.74	98.76	77.81	84.05	6.74	87.09	23.27	96.29	50.5	96.46	18.7	84.71	63.4	93.92	NA	NA	14.2	95.53	83.65	8.68	95.69
6.037E+09	7526	Los Angeles	91733	South El Monte	-118.0566643	34.0460044	84.72	99.65	95-100% (highest score)	0.051	71.66	12.1021381	78.44	0.767	96.01	787.94	92.53	84.24	92.84	0.00	0.00	6377.013396	94.52	1516.999	75.43	16	81.55	21.5	59.18	0.066	74.84	7	66.74	7.2	83.80	83.39	7.54	94.59	111.88	95.47	7.03	90.60	27.89	99.23	59.1	98.55	24.2	75.19	54.1	97.55	14.2	93.71	38.4	98.01	93.07	9.32	99.96
6.037E+09	3553	Los Angeles	90002	Florence-Graham	-118.2314205	33.9471147	74.50	99.63	95-100% (highest score)	0.044	37.57	12.0713992	82.66	0.270	73.06	718.21	78.76	85.22	93.50	0.00	0.00	5829.563232	93.85	994.4754	57.49	17.3	99.61	58.5	92.25	1.405	89.70	0	0.00	2.2	54.85	65.50	8.00	96.18	101.27	92.97	6.51	83.69	25.19	97.77	48.9	94.35	23.4	88.35	53.4	85.50	8.9	80.11	34.6	96.28	94.72	9.84	99.99
6.037E+09	5363	San Bernardino	91761	Ontario	-117.6383211	34.0557486	74.45	99.62	95-100% (highest score)	0.062	88.82	13.1047195	97.40	0.691	95.19	787.94	92.53	90.81	97.32	0.00	0.00	4611.102888	91.83	1241.746	74.6	52.5	96.32	36	83.66	3.245	96.66	7	66.74	3.6	66.72	75.72	9.04	99.58	84.51	88.60	6.88	84.10	21.47	92.25	44.5	93.23	10	79.37	76	98.92	12.8	93.83	30.3	91.04	93.16	9.66	99.72
6.037E+09	5768	Los Angeles	90023	Los Angeles	-118.2070814	33.8886904	74.44	99.61	95-100% (highest score)	0.042	26.70	12.06227	81.93	0.693	95.23	806.80	94.24	78.27	87.74	25.99	67.83	582791.0822	99.92	2511.595	92.75	16.65	77.45	60.3	92.31	8.38	99.10	0	0.00	15.95	96.47	78.23	9.55	99.90	70.46	78.74	5.81	71.26	13.6	58.00	25.6	74.34	18	83.35	44.3	91.75	11.4	90.13	87.39	26.8	84.46	75.13	7.79	96.81
6.037E+09	4812	Los Angeles	90805	Long Beach	-118.1973179	33.8467868	74.40	99.60	95-100% (highest score)	0.045	29.89	12.0440578	80.60	0.767	96.01	787.94	92.53	86.80	94.24	0.00	0.00	6377.013396	94.52	1516.999	75.43	14.1	83.77	43.85	86.54	0.00	0.00	7	66.74	3.6	66.72	73.83	8.80	98.21	97.86	84.05	6.74	86.72	19.59	82.06	41.4	92.08	14.2	93.71	38.4	98.01	93.07	9.32	99.96
6.037E+09	4577	Fresno	93702	Fresno	-119.7634654	36.7540827	67.59	99.53	95-100% (highest score)	0.060	82.48	13.7172337	97.03	0.699	95.36	733.95	84.39	82.56	91.58	0.00	0.00	1530.843302	73.64	2784.997	94.67	0.0	0.00	0	0.00	0.11	19.25	0	0.00	6	79.95	58.20	7.51	88.28	119.77	95.87	5.99	74.90	20.88	90.20	55.1	98.37	24.3	91.70	83.6	99.55	13.8	95.50	35.8	96.73	91.68	9.51	99.50
6.059E+09	4709	Los Angeles	90805	Florence-Graham	-118.2445131	33.9067265	67.54	99.52	95-100% (highest score)	0.043	29.89	12.0441539	80.04	0.767	96.01	787.94	92.53	86.80	94.24	0.00	0.00	6377.013396	94.52	1516.999	75.43	42.25	94.14	6.75	38.81	0.00	0.00	7	66.74	3.6	66.72	73.83	8.80	98.21	97.86	84.05	6.74	86.72	19.59	82.06	41.4	92.08	14.2	93.71	38.4	98.01	93.07	9.32	99.96
6.037E+09	5768	Los Angeles	90023	Los Angeles	-118.2070814	33.8886904	74.44	99.51	95-100% (highest score)	0.042	26.70	12.06227	81.93	0.693	95.23	806.80	94.24	78.27	87.74	25.99	67.83	582791.0822	99.92	2511.595	92.75	16.65	77.45	60.3	92.31	8.38	99.10	0	0.00	15.95	96.47	78.23	9.55	99.90	70.46	78.74	5.81	71.26	13.6	58.00	25.6	74.34	18	83.35	44.3	91.75	11.4	90.13	87.39	26.8	84.46	75.13	7.79	96.81
6.037E+09	4812	Los Angeles	90805	Long Beach	-118.1973179	33.8467868	74.40	99.50	95-100% (highest score)	0.045	29.89	12.0440578	80.60	0.767	96.01	787.94	92.53	86.80	94.24	0.00	0.00	6377.013396	94.52	1516.999	75.43	14.1	83.77	43.85	86.54	0.00	0.00	7	66.74	3.6	66.72	73.83	8.80	98.21	97.86	84.05	6.74	86.72	19.59	82.06	41.4	92.08	14.2	93.71	38.4	98.01	93.07	9.32	99.96
6.037E+09	4880	Los Angeles	90023	Commerce	-118.1751711	34.0096885	74.06	99.48	95-100% (highest score)	0.043	55.38	12.150745	87.07	0.938	97.81	524.04	62.60	91.76	97.98	0.00	0.00	3547.573424	86.92	2783.139	94.61	29.5	93.37	20.5	68.92	11.62	99.66	7	66.74	6.25	80.44	77.46	9.46	99.84	56.57	64.84	6.38	81.88	18.99	84.21	43.5	92.52	21.2	88.00	60.1	91.91	6.4	61.53	16.1	57.59	46.02	75.49	7.83	87.25
6.037E+09	5221	Los Angeles	90011	Los Angeles	-118.1975508	33.8869935	74.02	99.47	95-100% (highest score)	0.046	46.99	12.0172281	88.65	0.475	89.00	495.60	60.16	95.13	98.95	0.04	20.31	10830.04993	97.85	2630.563	93.64	4.4	41.28	24.3	73.78	0.925	83.94	7	66.74	1.6	42.50	68.80	8.40	97.83	92.82	0.5	22.08	74.46	9.25	99.61	7.25	83.92	23.3	96.51	37.4	87.67	14.5	76.07	54.7	97.86	8.6	84.54	21.1	74.52	87.77	9.21	99.93
6.037E+09	4071	Riverside	92501	Riverside	-117.3763853	33.9798271	74.02	99.46	95-100% (highest score)	0.047	59.69	11.5398683	63.83	0.773	96.47	389.85	41.55	77.37	86.84	0.00	0.00	1051.044421	56.76	1166.648	68.24	29.25	88.37	38.25	85.14	0.985	84.92	0	0.00	4.2	69.67	65.19	7.96	95.99	95.27	91.31	6.79	87.55	15.24	96.42	19.3	63.60	9.1	59.75	46.4	77.99	8.77	89.23	84.43	8.76	97.26
6.037E+09	4724	Los Angeles	90813	Long Beach	-118.1577966	33.7796381	74.01	99.45	95-100% (highest score)	0.045	29.89	12.0440578	80.60	0.767	96.01	787.94	92.53	86.80	94.24	0.00	0.00	6377.013396	94.52	1516.999	75.43	14.1	83.77	43.85	86.54	0.00	0.00	7	66.74	3.6	66.72	73.83	8.80	98.21	97.86	84.05	6.74	86.72	19.59	82.06	41.4	92.08	14.2	93.71	38.4	98.01	93.07	9.32	99.96
6.029E+09	3190	Kern	93307	Bakersfield	-118.9985321	35.3604075	67.00	99.44	95-100% (highest score)	0.065	91.63	15.8343119	99.86	1.062	98.44	625.12	70.31	84.05	92.70	0.00	0.00	30.13933383	14.40	902.2936	51.70	10.1	87.50	12.5	53.10	0.5	69.03	0	0.00	1.5	42.31	58.50	7.04	93.74	81.76	86.30	5.86	72.32	22.41	94.08	58.6	99.01	26.2	93.33	70.7	97.60	13.5	86.37	33.2

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Demographic data (total population, age groups and race/ethnicity) by census tract were extracted from the 2019 American Community Survey.

Census Tract	CES 4.0 Score	CES 4.0 Percentile	CES 4.0 Percentile Range	California County	Total Population	Children < 10 years (%)	Pop 10-64 years (%)	Elderly > 64 years (%)	Hispanic (%)	White (%)	African American (%)	Native American (%)	Asian American (%)	Other/Multiple (%)
6001400100	4.85	2.80	1-5% (lowest scores)	Alameda	3120	7.82	66.12	26.06	3.78	74.26	3.43	0	12.53	5.99
6001400200	4.88	2.87	1-5% (lowest scores)	Alameda	2007	10.46	66.32	23.22	8.67	73.49	2.59	0.2	8.52	6.53
6001400300	11.20	15.94	15-20%	Alameda	5051	11.42	73.04	15.54	6.95	67.99	9.09	0	12.14	3.84
6001400400	12.39	18.97	15-20%	Alameda	4007	9.38	78.79	11.83	12.1	63.74	6.64	0.87	10.48	6.16
6001400500	16.73	29.74	25-30%	Alameda	4124	9.12	81.96	8.92	9.46	45.44	21.39	0	11.34	12.37
6001400600	20.02	37.59	35-40%	Alameda	1745	9.97	81.43	8.6	7.51	49.28	20.52	0.17	10.54	11.98
6001400700	36.71	70.13	70-75%	Alameda	5128	7.62	82.45	9.93	19.38	38.28	28.24	0	6.42	7.68
6001400800	37.10	70.71	70-75%	Alameda	4069	9.04	81.52	9.44	10.62	43.55	23.27	0.2	15.19	7.18
6001400900	40.71	76.15	75-80%	Alameda	2471	11.17	79.81	9.02	15.82	41.64	28.77	2.47	4.09	7.2
6001401000	43.74	80.41	80-85%	Alameda	6133	9.96	80.61	9.42	18.72	33.44	30.36	0	8.27	9.21
6001401100	32.93	63.86	60-65%	Alameda	4287	8.82	84.7	6.48	10.75	52.39	7.74	0	20.08	9.03
6001401200	20.25	38.11	35-40%	Alameda	2619	8.59	82.44	8.97	12.18	61.02	11.26	0.08	11.49	3.97
6001401300	43.68	80.35	80-85%	Alameda	3921	3.9	81.92	14.18	10.12	38.41	28.51	0.61	16.76	5.59
6001401400	45.08	82.12	80-85%	Alameda	4732	8.09	84.53	7.38	18.96	25.74	31.93	1.54	12.37	9.47
6001401500	44.53	81.43	80-85%	Alameda	2839	4.54	84.71	10.74	14.12	36.91	37.34	0	5.39	6.23
6001401600	48.78	86.50	85-90%	Alameda	2289	6.68	88.16	5.16	20.05	28.66	35.91	0	11.36	4.02
6001401700	43.47	80.09	80-85%	Alameda	3018	12.06	80.22	7.72	26.64	38.87	17.03	0	12.16	5.3
6001401800	45.10	82.16	80-85%	Alameda	1801	10.94	80.07	9	20.27	33.48	38.2	0.22	5.5	2.33
6001402200	55.82	93.12	90-95%	Alameda	2477	11.51	79.09	9.41	16.23	29.87	31.77	1.25	16.35	4.52
6001402400	37.31	71.02	70-75%	Alameda	2866	8.86	74.56	16.57	9.14	24.11	48.39	0	12.98	5.37
6001402500	50.81	88.67	85-90%	Alameda	1781	17.24	72.99	9.77	14.77	10.89	58.39	0	13.31	2.64
6001402600	42.12	78.23	75-80%	Alameda	1243	5.87	68.46	25.66	16.49	14.4	25.91	0.48	38.7	4.02
6001402700	38.87	73.30	70-75%	Alameda	1890	9.68	82.65	7.67	20.58	23.23	42.28	0.63	10.85	2.43
6001402800	41.72	77.66	75-80%	Alameda	4480	5.58	75.27	19.15	6.27	28.19	38.08	0.58	18.57	8.3
6001402900	36.39	69.74	65-70%	Alameda	1406	0.43	71.41	28.17	17.64	21.55	17.14	0.21	37.55	5.9
6001403000	53.41	91.24	90-95%	Alameda	2905	4.68	55.83	39.48	2.27	6.51	4.37	0.34	83.93	2.58
6001403100	35.96	69.10	65-70%	Alameda	2101	5.19	82.67	12.14	13.04	27.84	17.66	0.29	38.41	2.76
6001403300	45.88	83.06	80-85%	Alameda	4178	3.52	75.78	20.7	6.03	26.16	7.47	2.39	52.23	5.72
6001403400	29.43	57.67	55-60%	Alameda	4340	4.26	74.65	21.08	8.18	39.54	19.15	0.44	26.8	5.9
6001403501	25.31	49.48	45-50%	Alameda	4492	7.59	74.93	17.48	12.27	37.47	23.89	0.53	19.46	6.39
6001403502	19.87	37.22	35-40%	Alameda	2044	3.38	83.46	13.16	11.94	42.03	25.44	0	11.11	9.49
6001403600	25.58	50.05	50-55%	Alameda	5570	9.41	80.48	10.11	13.91	29.34	41.24	0.23	9.37	5.91
6001403701	14.10	23.29	20-25%	Alameda	2968	4.14	77.29	18.56	12.2	43.03	26.75	0	12.6	5.42
6001403702	14.98	25.53	25-30%	Alameda	1930	5.54	77.67	16.79	9.79	51.92	15.03	0	17.67	5.6
6001403800	11.72	17.13	15-20%	Alameda	3351	7.67	78.96	13.37	3.58	67.74	12.98	0	11.82	3.88
6001403900	16.00	27.82	25-30%	Alameda	4051	6.74	77.09	16.17	7.43	57.29	13.55	0.22	16.17	5.33
6001404000	8.89	10.46	10-15%	Alameda	2895	5.94	82.28	11.78	16.41	55.2	7.25	1	12.64	7.5
6001404101	9.35	11.28	10-15%	Alameda	3017	3.81	79.52	16.67	7.03	62.18	7.86	0.36	12.6	9.98
6001404102	12.92	20.35	20-25%	Alameda	2653	4.98	62.16	32.87	9.88	66.49	4.71	1.36	12.77	4.79
6001404200	7.30	7.34	5-10%	Alameda	3877	13.95	68.22	17.82	5.6	61.75	6.32	0.21	19.83	6.29
6001404300	3.82	1.24	1-5% (lowest scores)	Alameda	3443	13.19	66.8	20.01	12	65.29	1.66	0	13.56	7.49
6001404400	4.57	2.36	1-5% (lowest scores)	Alameda	5628	10.41	70.52	19.07	5.31	67	2.33	0.32	12.95	12.08
6001404501	4.59	2.38	1-5% (lowest scores)	Alameda	1809	14.7	64.29	21.01	6.69	66.39	6.74	0	12.05	8.13
6001404502	6.27	5.28	5-10%	Alameda	5891	15.02	67.24	17.74	7.62	75.51	1.14	0	10.19	5.55
6001404600	4.69	2.52	1-5% (lowest scores)	Alameda	4625	9.84	65.92	24.24	4.82	69.69	3.85	0.17	15.35	6.12
6001404700	4.70	2.53	1-5% (lowest scores)	Alameda	2137	13.29	67.52	19.19	9.45	69.58	5.99	0	11.65	3.32
6001404800	14.33	23.88	20-25%	Alameda	2647	8.16	75.82	16.02	14.43	49.38	15.98	0.42	11.07	8.73
6001404900	15.34	26.30	25-30%	Alameda	4197	13.53	66.9	19.56	11.84	56.09	9.6	0.67	16.11	5.69
6001405000	7.42	7.49	5-10%	Alameda	3394	12.93	67.21	19.86	7.4	61.58	11.73	0	10.99	8.31
6001405100	6.28	5.30	5-10%	Alameda	4285	11.23	67.82	20.96	3.43	65.02	13.56	0	10.15	7.84
6001405200	21.97	42.10	40-45%	Alameda	5183	7.1	78.45	14.45	15.84	38.26	8.99	0.29	32.03	4.59
6001405301	21.69	41.50	40-45%	Alameda	2954	8.56	79.49	11.95	18.28	52.64	11.48	0	10.73	6.87
6001405302	30.21	59.11	55-60%	Alameda	2373	5.82	75.94	18.25	8.09	30.76	12.81	0.34	42.31	5.69
6001405401	33.36	64.69	60-65%	Alameda	3648	8.77	79.96	11.27	22.59	20.53	16.23	0	35.01	5.65
6001405402	36.47	69.83	65-70%	Alameda	3357	11.77	80.91	7.33	21.06	17.25	25.8	0.24	30.98	4.68

6001405500	28.35	55.56	55-60%	Alameda	3880	9.33	76.13	14.54	9.28	21.42	22.42	0.7	42.53	3.66
6001405600	24.82	48.36	45-50%	Alameda	3269	7.46	82.56	9.97	24.23	26.49	17.99	2.23	22.24	6.82
6001405700	30.13	58.99	55-60%	Alameda	3531	6.8	84.62	8.58	13.65	14.39	21.16	0.48	46.02	4.3
6001405800	28.80	56.56	55-60%	Alameda	4370	11.33	77.46	11.21	17.05	15.01	21.6	1.3	43.38	1.65
6001405901	39.68	74.46	70-75%	Alameda	4426	15.02	75.98	8.99	41.3	3.68	14.19	1.06	37.4	2.37
6001405902	41.25	77.00	75-80%	Alameda	2942	10.27	76.44	13.29	25.12	8.77	11.96	0.48	49.39	4.28
6001406000	50.20	88.09	85-90%	Alameda	3796	5.45	80.01	14.54	23.6	18.49	13.83	0	41.97	2.11
6001406100	56.86	93.85	90-95%	Alameda	4733	10.61	77.94	11.45	57.24	14.85	8.92	0	18	0.99
6001406201	45.57	82.68	80-85%	Alameda	4995	15.98	77.88	6.15	41.46	5.29	21.14	0.16	28.87	3.08
6001406202	42.01	78.09	75-80%	Alameda	4817	15.8	74.82	9.38	59.89	9.51	14.2	2.1	12.52	1.79
6001406300	31.11	60.87	60-65%	Alameda	4383	15.08	76.75	8.17	33.77	12.62	26.49	0.43	24.21	2.49
6001406400	30.25	59.18	55-60%	Alameda	2545	13.95	63.85	22.2	21.45	31.47	20.67	0.2	19.61	6.6
6001406500	36.37	69.70	65-70%	Alameda	6586	13.45	77.24	9.31	50.47	11.69	16.47	0	16.82	4.54
6001406601	27.03	53.09	50-55%	Alameda	4955	13.3	76.83	9.87	35.6	14.89	20.02	0.16	21.98	7.35
6001406602	26.06	51.07	50-55%	Alameda	2698	12.12	75.76	12.12	28.28	12.6	16.42	1.56	36.25	4.89
6001406700	10.22	13.54	10-15%	Alameda	5159	9.79	67.59	22.62	13.82	45.13	14.5	0.66	20.53	5.37
6001406800	13.00	20.54	20-25%	Alameda	3611	14.07	68.85	17.09	25.31	33.12	11.16	0.44	21.07	8.89
6001406900	20.48	38.72	35-40%	Alameda	3608	11.83	70.57	17.6	10.2	47.03	18.57	0.42	16.77	7.01
6001407000	29.70	58.14	55-60%	Alameda	5869	12.57	73.33	14.09	29.95	13.12	21.03	1.16	24.76	9.98
6001407101	30.25	59.17	55-60%	Alameda	3821	14.81	75.61	9.58	54.23	4.92	13.98	0.21	25.02	1.65
6001407102	35.42	68.27	65-70%	Alameda	4387	17.39	72.83	9.78	44.54	9.92	26.05	0.39	13.93	5.17
6001407200	48.46	86.11	85-90%	Alameda	6985	11.71	79.3	8.99	64.98	9.55	8.45	0.21	13.9	2.91
6001407300	65.03	97.84	95-100% (highest scores)	Alameda	2420	6.28	87.48	6.24	63.72	11.82	10.99	0.12	10.25	3.1
6001407400	45.38	82.36	80-85%	Alameda	4531	16.29	75.86	7.86	70.12	1.77	18.16	0	7.46	2.49
6001407500	45.45	82.50	80-85%	Alameda	4299	13.63	77.62	8.75	55.04	4.16	29.01	0.09	6.59	5.12
6001407600	31.10	60.83	60-65%	Alameda	6327	11.27	80.09	8.65	32.01	16.75	39.07	0	8.31	3.86
6001407700	15.74	27.22	25-30%	Alameda	4122	11.67	71.98	16.35	16.21	30.01	42.94	0	5.41	5.43
6001407800	17.96	32.59	30-35%	Alameda	2728	9.68	79.44	10.89	19.83	31.16	23.64	0	20.27	5.1
6001407900	14.34	23.92	20-25%	Alameda	2873	16.92	66.79	16.29	8.39	49.7	18.45	0	15.63	7.83
6001408000	4.80	2.74	1-5% (lowest scores)	Alameda	2700	6.19	74.04	19.78	12.48	54.67	9.26	0.44	18.55	4.59
6001408100	13.61	21.99	20-25%	Alameda	6320	8.53	68.66	22.82	10.06	40.05	23.83	0	20.36	5.7
6001408200	23.29	45.12	45-50%	Alameda	4570	9.34	79.43	11.23	15.6	18.25	51.42	0.77	5.87	8.1
6001408300	31.39	61.31	60-65%	Alameda	5047	11.55	77.43	11.02	21.93	22.51	37.19	0.12	12.88	5.37
6001408400	27.63	54.16	50-55%	Alameda	3201	12.4	78.01	9.59	37.8	7.44	50.3	0	1.87	2.59
6001408500	32.68	63.57	60-65%	Alameda	5977	20.28	72.66	7.06	53.61	2.41	36.82	0.02	4.1	3.05
6001408600	34.61	66.94	65-70%	Alameda	7096	21.1	70.45	8.46	52.35	3.31	35.19	0.27	4.26	4.62
6001408700	33.17	64.38	60-65%	Alameda	7909	14.49	73.23	12.28	45.08	8.38	41.88	0	2.29	2.38
6001408800	61.01	96.24	95-100% (highest scores)	Alameda	7149	20.74	70.26	8.99	46.64	5.41	38.02	0	9.36	0.57
6001408900	52.21	90.27	90-95%	Alameda	3546	16.02	75.21	8.77	65.93	4.94	21.4	0	5.56	2.17
6001409000	63.17	97.18	95-100% (highest scores)	Alameda	4687	18.33	72.97	8.7	53.53	2.01	34.95	0	4.85	4.67
6001409100	57.14	94.00	90-95%	Alameda	2490	13.82	77.67	8.51	59.24	1.97	27.87	0.72	4.38	5.82
6001409200	46.20	83.48	80-85%	Alameda	3672	12.25	80.17	7.57	57.03	2.53	30.96	0	6.54	2.94
6001409300	36.59	70.01	70-75%	Alameda	5303	17.01	72.94	10.05	65.17	4.79	24.61	0	3.3	2.13
6001409400	50.37	88.29	85-90%	Alameda	4780	17.3	76.21	6.49	69.6	4.52	15.23	0	9.58	1.07
6001409500	53.65	91.41	90-95%	Alameda	4128	18.1	73.69	8.21	64.87	4.19	25	0.12	3.68	2.13
6001409600	32.30	62.92	60-65%	Alameda	4978	13.46	78.75	7.79	57.01	3.19	32.6	0.22	5.4	1.57
6001409700	21.77	41.68	40-45%	Alameda	4991	16.83	76	7.17	57.7	3.55	32.02	0	2.22	4.51
6001409800	30.41	59.51	55-60%	Alameda	3516	10.49	74.8	14.7	12.51	20.39	55.29	0.28	4.27	7.25
6001409900	23.07	44.70	40-45%	Alameda	3642	12.05	65.95	21.99	8.1	28.72	47.09	0	7.28	8.81
6001410000	25.12	48.97	45-50%	Alameda	3242	10.83	64.47	24.71	9.25	28.84	40.13	0.25	5.76	15.76
6001410100	31.17	60.99	60-65%	Alameda	2667	13.69	73.23	13.09	17.55	12.37	55.46	0	5.36	9.26
6001410200	26.95	52.92	50-55%	Alameda	3630	13.22	76.14	10.63	35.23	1.46	55.1	0.85	5.24	2.12
6001410300	28.62	56.16	55-60%	Alameda	3857	16.75	77.39	5.86	65.52	2.15	24.86	0.47	4.46	2.54
6001410400	28.06	55.13	55-60%	Alameda	4477	11.32	77.06	11.61	47.71	6.39	33.62	0.27	10.1	1.92
6001410500	53.08	90.94	90-95%	Alameda	2705	16.67	75.6	7.73	9.83	14.9	61.07	0.26	11.76	2.18
6001420100	6.52	5.80	5-10%	Alameda	2440	11.6	74.39	14.02	7.87	61.72	0.45	0.41	20.98	8.57
6001420200	10.87	15.18	15-20%	Alameda	3332	12.12	75.24	12.64	12.06	35.5	5.58	0.54	38.39	7.92
6001420300	16.07	28.08	25-30%	Alameda	4977	13.58	74.06	12.36	15.69	29.78	3.94	1.21	40.96	8.42

6001420400	23.88	46.44	45-50%	Alameda	3062	22.53	76.06	1.4	29.78	31.71	1.21	0.36	30.96	5.98
6001420500	21.69	41.49	40-45%	Alameda	2557	13.34	74.03	12.63	11.18	51.15	5.4	1.06	21.12	10.09
6001420600	3.81	1.21	1-5% (lowest scores)	Alameda	3436	10.71	70.95	18.34	11.64	66.44	0.35	0	15.16	6.4
6001421100	3.28	0.86	1-5% (lowest scores)	Alameda	2084	8.45	58.25	33.3	5.9	78.36	1.73	0	11.04	2.98
6001421200	3.41	0.98	1-5% (lowest scores)	Alameda	3594	10.55	56.54	32.92	4.12	72.87	1.34	0.11	10.13	11.44
6001421300	4.08	1.69	1-5% (lowest scores)	Alameda	3873	10.92	59.7	29.38	3.67	78.65	1.5	0	8.99	7.2
6001421400	5.37	3.66	1-5% (lowest scores)	Alameda	1634	8.2	60.47	31.33	6.43	73.38	1.84	0.43	12.6	5.32
6001421500	4.32	2.07	1-5% (lowest scores)	Alameda	3694	8.07	65.32	26.61	4.74	77.77	2.57	0	12.05	2.87
6001421600	1.57	0.08	1-5% (lowest scores)	Alameda	3617	10.64	62.76	26.6	3.98	73.49	3.1	0	13.43	6
6001421700	10.85	15.13	15-20%	Alameda	3492	9.05	71.88	19.07	9.25	68.24	0.66	0.14	18.07	3.64
6001421800	9.61	11.95	10-15%	Alameda	2144	7.6	70.71	21.69	3.03	74.77	1.45	0.05	13.99	6.72
6001421900	15.88	27.53	25-30%	Alameda	4171	12.68	70.18	17.14	10.67	56.22	5.35	0	17.94	9.83
6001422000	34.16	66.17	65-70%	Alameda	2156	11.64	78.06	10.3	6.86	64.33	10.85	0	8.16	9.79
6001422100	27.31	53.61	50-55%	Alameda	3073	8.07	79.11	12.82	20.89	47.02	12.82	0.81	12.2	6.25
6001422200	25.02	48.78	45-50%	Alameda	3237	8.68	75.84	15.48	16.34	52.95	5.28	0	15.79	9.64
6001422300	17.64	31.93	30-35%	Alameda	3643	9.36	74.33	16.31	8.81	60.17	2.88	0.16	21.36	6.62
6001422400	14.90	25.28	25-30%	Alameda	4487	4.26	85.02	10.72	13.73	42.03	1.25	0	37.69	5.3
6001422500	14.16	23.44	20-25%	Alameda	4400	4.07	88.41	7.52	9.89	47.34	2.86	0.23	33.95	5.73
6001422600	NA	NA	NA	Alameda	1043	0	99.23	0.77	12.37	38.64	3.07	0	44.01	1.92
6001422700	15.07	25.72	25-30%	Alameda	5266	0.42	97.04	2.54	16.56	45.4	2.39	0.89	29.36	5.39
6001422800	16.05	27.99	25-30%	Alameda	9064	0	99.13	0.87	16.14	28.46	4.21	0.14	45.65	5.38
6001422900	19.18	35.60	35-40%	Alameda	5761	0.47	93.42	6.11	5.26	33.97	11.99	0	44.73	4.04
6001423000	23.68	45.81	45-50%	Alameda	4962	8.42	78.23	13.34	12.03	53.39	4.86	0.1	24.87	4.76
6001423100	29.82	58.33	55-60%	Alameda	4413	8.52	76.52	14.96	12.92	49.6	16.61	0	15.11	5.76
6001423200	39.81	74.68	70-75%	Alameda	2982	10.19	82.46	7.34	27.2	30.58	22.43	0	10.73	9.05
6001423300	31.60	61.62	60-65%	Alameda	3504	14.04	67.52	18.44	12.56	44.41	25.49	0.09	9.5	7.96
6001423400	22.31	42.78	40-45%	Alameda	5163	6.41	82.36	11.23	14.8	49.35	13.73	0	12.18	9.94
6001423500	15.43	26.49	25-30%	Alameda	3426	10.25	70.17	19.59	14.21	47.52	20.2	0	13.72	4.35
6001423601	10.50	14.09	10-15%	Alameda	2671	5.39	75.7	18.91	8.72	70.35	5.17	0.64	9.21	5.92
6001423602	14.24	23.65	20-25%	Alameda	6528	1.32	93.15	5.53	8.75	47.29	1.29	1.52	35.78	5.38
6001423700	7.27	7.22	5-10%	Alameda	4148	3.47	82.09	14.44	10.56	61.4	2.29	0.14	20.39	5.21
6001423800	4.73	2.58	1-5% (lowest scores)	Alameda	2986	7.27	62.86	29.87	6.36	79.44	2.38	0	7.07	4.76
6001423901	18.83	34.81	30-35%	Alameda	2054	5.01	82.91	12.07	13.92	62.76	10.66	0.34	9.1	3.21
6001423902	11.02	15.54	15-20%	Alameda	1605	9.41	73.52	17.07	5.98	70.72	2.93	0	15.45	4.92
6001424001	25.18	49.13	45-50%	Alameda	4027	10.31	80.08	9.61	16.29	46.83	22.15	0.32	8.64	5.76
6001424002	32.14	62.64	60-65%	Alameda	2583	12.93	75.03	12.04	22.69	27.37	33.6	0.54	10.34	5.46
6001425101	31.46	61.40	60-65%	Alameda	1659	1.15	69.74	29.11	5.85	58.41	3.5	0.3	25.74	6.21
6001425102	26.69	52.42	50-55%	Alameda	3906	6.99	86.43	6.58	8.99	34.02	8.32	0.2	41.78	6.68
6001425103	23.05	44.63	40-45%	Alameda	2795	4.69	89.37	5.94	7.48	43.61	15.31	0.07	26.33	7.19
6001425104	28.53	55.95	55-60%	Alameda	3539	7.8	74.65	17.55	13.62	36.08	26.59	0	18.46	5.26
6001426100	2.48	0.44	1-5% (lowest scores)	Alameda	6521	9.39	68.06	22.56	2.05	73.35	0.69	0	19.9	4
6001426200	10.66	14.55	10-15%	Alameda	4796	10.49	69.47	20.04	7.01	67.6	2.29	0.08	15.2	7.82
6001427100	16.66	29.51	25-30%	Alameda	3975	9.71	69.99	20.3	16.1	64.15	1.38	0.48	14.46	3.42
6001427200	34.06	65.91	65-70%	Alameda	4180	11.34	73.09	15.57	16.79	40.05	2.92	0.29	35.9	4.04
6001427300	31.74	61.93	60-65%	Alameda	5346	13.73	67.15	19.12	10.87	37.34	7.22	0.41	38.29	5.87
6001427600	36.08	69.28	65-70%	Alameda	5200	14.27	77.77	7.96	10.27	28.52	18.75	0.08	35.48	6.9
6001427700	20.48	38.69	35-40%	Alameda	5201	8.09	76.5	15.4	17.71	48.45	9.44	0.04	17.88	6.48
6001427800	17.64	31.92	30-35%	Alameda	4954	10.56	74.38	15.06	9.87	53.88	4.76	0.12	21.7	9.67
6001427900	17.81	32.25	30-35%	Alameda	5052	9.2	78.88	11.92	14.25	48.14	4.59	0.67	28.35	4
6001428000	28.54	55.98	55-60%	Alameda	2877	7.4	79.91	12.69	23.39	36.29	5.32	0.1	27.15	7.75
6001428100	17.29	31.05	30-35%	Alameda	4839	10.93	73.86	15.21	11.57	52.76	6.51	0	22.36	6.8
6001428200	17.98	32.73	30-35%	Alameda	6606	11.87	69.63	18.5	12.82	51.79	6.27	0	21.57	7.55
6001428301	11.80	17.32	15-20%	Alameda	7277	12.37	73.29	14.35	10.6	31.66	4.64	0.3	44.34	8.45
6001428302	10.97	15.38	15-20%	Alameda	7424	12.96	66.69	20.35	6.45	41.69	2.61	0	42.9	6.34
6001428400	15.57	26.85	25-30%	Alameda	4568	12.92	71.54	15.54	17.56	39.71	10.75	0.46	25.35	6.17
6001428500	14.72	24.84	20-25%	Alameda	3097	10.91	72.36	16.73	12.82	41.14	7.94	1	27.58	9.53
6001428600	14.90	25.26	25-30%	Alameda	3454	11.87	64.01	24.12	6.02	42.96	7.35	0.26	34.22	9.18
6001428700	41.60	77.47	75-80%	Alameda	4472	17.62	73.95	8.43	16.26	27.42	16.82	0.42	32.67	6.42

6001430101	13.97	22.92	**20-25%**	Alameda	6842	12.41	70.29	17.3	9.37	28.95	6.45	0.15	50.89	4.19
6001430102	2.02	0.25	**1-5% (lowest scores)**	Alameda	2424	9.28	69.18	21.53	12.29	57.84	1.69	0	20.05	8.13
6001430200	6.55	5.87	**5-10%**	Alameda	6878	13.13	68.17	18.7	9.46	56.47	4.71	0.89	23.85	4.61
6001430300	8.03	8.56	**5-10%**	Alameda	3826	12.28	69.58	18.14	13.12	55.85	1.12	0	25.64	4.26
6001430400	6.78	6.30	**5-10%**	Alameda	2107	10.82	69.72	19.46	11.72	58.99	1.52	0	22.5	5.27
6001430500	28.80	56.54	**55-60%**	Alameda	5987	13.23	74.58	12.19	19.22	29.33	24.85	0.77	21.92	3.91
6001430600	13.69	22.24	**20-25%**	Alameda	6486	10.96	66.05	22.99	12.78	46.15	7.49	0.49	28.11	4.98
6001430700	10.83	15.07	**15-20%**	Alameda	4170	14.22	73.07	12.71	15.8	50.14	4.87	0.43	21.1	7.65
6001430800	28.32	55.50	**55-60%**	Alameda	5282	11.42	71.39	17.19	7.5	57.08	1.53	0.89	29.07	3.94
6001430900	27.66	54.22	**50-55%**	Alameda	5309	17.07	68.56	14.37	21	42.12	9.68	0.85	19.13	7.21
6001431000	34.26	66.31	**65-70%**	Alameda	2777	16.02	73.14	10.84	19.45	36.51	5.69	0.72	30.75	6.88
6001431100	19.73	36.83	**35-40%**	Alameda	3561	11.99	78.66	9.35	30.36	31.9	17.05	0.14	13.09	7.47
6001431200	19.55	36.31	**35-40%**	Alameda	5574	9.99	71.33	18.68	23.32	46.39	10.64	0	13.94	5.71
6001432100	21.68	41.48	**40-45%**	Alameda	3574	9.57	72.02	18.41	17.8	45.13	11.56	0	20.39	5.12
6001432200	21.16	40.32	**40-45%**	Alameda	4078	9.51	70.75	19.74	24.23	34.58	22.09	0.37	12.88	5.86
6001432300	27.49	53.92	**50-55%**	Alameda	4744	8.87	80.73	10.39	33.05	19.08	11.42	0.34	30.06	6.05
6001432400	49.04	86.78	**85-90%**	Alameda	7003	12.17	77.17	10.67	42.12	16.99	6.64	0	31.62	2.63
6001432501	49.49	87.36	**85-90%**	Alameda	4854	10.24	75.44	14.32	29.77	16.98	7.29	0.12	42.3	3.54
6001432502	34.40	66.52	**65-70%**	Alameda	5178	11.9	78.2	9.91	29.7	13.81	13.25	0.06	40.77	2.41
6001432600	36.29	69.54	**65-70%**	Alameda	7043	10.32	73.26	16.41	30.34	25.43	14.62	0.7	25.64	3.27
6001432700	25.69	50.30	**50-55%**	Alameda	2816	7.88	74.68	17.44	25.82	44	5.97	0.43	17.23	6.57
6001432800	19.89	37.24	**35-40%**	Alameda	3979	10.4	63.23	26.36	21.36	29.35	10.35	0.15	33.73	5.05
6001433000	30.77	60.20	**60-65%**	Alameda	3654	9.8	72.14	18.06	20.61	30.02	5.88	0.08	40.23	3.17
6001433102	27.37	53.71	**50-55%**	Alameda	4485	13.11	71.24	15.65	36.16	11.17	8.63	0.11	41.34	2.59
6001433103	32.97	64.01	**60-65%**	Alameda	3523	9.99	83.22	6.78	42.95	13.71	16.58	0.57	24.64	1.56
6001433104	31.38	61.28	**60-65%**	Alameda	3724	10.23	70.54	19.23	29.86	28.49	21.78	0.64	12.11	7.12
6001433200	43.02	79.53	**75-80%**	Alameda	7991	15.4	73.18	11.41	28.66	17.47	12.11	0.48	36.75	4.53
6001433300	39.63	74.36	**70-75%**	Alameda	7761	9.26	74.53	16.21	23.45	26.66	0.27	0	47.01	2.6
6001433400	20.66	39.21	**35-40%**	Alameda	5934	6.74	72.4	20.86	9.03	16.48	9.29	1.31	58.66	5.22
6001433500	22.43	43.12	**40-45%**	Alameda	4830	11.47	72.88	15.65	22.67	26.46	4.22	0	46.64	0
6001433600	33.33	64.62	**60-65%**	Alameda	6094	11.6	76.8	11.6	17.69	23.12	8.71	2	42.78	5.69
6001433700	31.92	62.27	**60-65%**	Alameda	3503	11.3	83.44	5.25	57.49	13.05	5.31	0.74	18.7	4.71
6001433800	31.92	62.28	**60-65%**	Alameda	8179	9.93	78.51	11.57	44.81	9.38	7.76	0.23	37.23	0.59
6001433900	36.09	69.29	**65-70%**	Alameda	7685	15.84	77.62	6.55	40.62	10.72	22.32	0.09	17.25	8.99
6001434000	36.42	69.77	**65-70%**	Alameda	5334	17.36	73.08	9.56	46.63	13.67	16.31	0.37	18.8	4.22
6001435102	8.35	9.28	**5-10%**	Alameda	6189	6.4	79.95	13.65	29.44	27.53	13.96	0.53	23.33	5.2
6001435103	6.18	5.04	**5-10%**	Alameda	7420	8.81	76.81	14.38	10.81	29.35	7.45	0	44.39	7.99
6001435104	32.39	63.15	**60-65%**	Alameda	6117	15.11	75.66	9.24	38.56	14.34	11	0.36	28.04	7.7
6001435200	15.56	26.83	**25-30%**	Alameda	4659	11.57	71.54	16.89	27.39	22.41	19.77	0.24	23.78	6.42
6001435300	19.53	36.27	**35-40%**	Alameda	4739	7.55	79.76	12.68	27.12	25.03	23.13	0.15	21.27	3.31
6001435400	33.37	64.71	**60-65%**	Alameda	4538	12.67	74.44	12.89	23.75	21.84	27.04	0.4	20.29	6.68
6001435500	38.54	72.93	**70-75%**	Alameda	3983	9.04	76.8	14.16	41.43	29.1	11.45	0.5	14.58	2.94
6001435601	33.17	64.40	**60-65%**	Alameda	5662	15.63	78.03	6.34	57.26	11.11	12.7	0.07	15.51	3.36
6001435602	22.31	42.76	**40-45%**	Alameda	5453	13.11	75.9	10.98	56.89	23.88	6.64	0.11	11.21	1.28
6001435700	32.15	62.67	**60-65%**	Alameda	5231	9.92	74.4	15.68	47.47	21.33	11.36	0.1	16.99	2.75
6001435800	26.14	51.22	**50-55%**	Alameda	5543	11.6	76.71	11.69	43.12	22.61	1.23	0	27.91	5.14
6001435900	26.25	51.40	**50-55%**	Alameda	5371	11.02	74.27	14.71	32.95	28.62	3.44	0	32.06	2.92
6001436000	21.42	40.95	**40-45%**	Alameda	5063	16.24	70.25	13.51	42.43	29.75	0.85	0.63	24.49	1.86
6001436100	24.20	47.14	**45-50%**	Alameda	5977	8.25	75.62	16.13	41.53	20.55	3.51	0.49	29.18	4.75
6001436200	36.65	70.06	**70-75%**	Alameda	4266	19.5	69.76	10.74	57.55	10.62	16.46	0	12.09	3.28
6001436300	32.64	63.53	**60-65%**	Alameda	9444	11.5	77.03	11.47	48.17	13.13	9.71	0.24	26.97	1.78
6001436401	18.60	34.22	**30-35%**	Alameda	7173	10.25	74.15	15.6	20.61	34.85	14.43	0.13	23	6.98
6001436402	3.49	1.01	**1-5% (lowest scores)**	Alameda	2704	7.43	64.79	27.77	18.86	42.05	10.87	0	20.89	7.32
6001436500	29.69	58.12	**55-60%**	Alameda	5375	13.19	81.1	5.71	44.56	14.87	9.58	0.07	25.12	5.8
6001436601	32.01	62.41	**60-65%**	Alameda	6938	17.53	74.6	7.87	55.48	12.78	6.73	0	15.13	9.87
6001436602	34.52	66.74	**65-70%**	Alameda	5113	15.76	75.87	8.37	48.46	10.44	13.73	0	24.21	3.15
6001436700	27.68	54.27	**50-55%**	Alameda	3265	11.64	76.48	11.88	48.45	20.12	5.94	0	21.75	3.74
6001436800	34.60	66.91	**65-70%**	Alameda	4382	11.71	78.37	9.93	45.94	12.05	13.46	0.87	25.08	2.6

6001436900	34.87	67.37	65-70%	Alameda	6745	14.91	77.48	7.61	55.89	12.2	7.23	0.07	21.72	2.88
6001437000	31.47	61.42	60-65%	Alameda	3493	7.62	76.9	15.49	44.03	18.04	5.67	0.29	27.94	4.04
6001437101	39.53	74.21	70-75%	Alameda	7867	9.64	77.98	12.38	23.48	15.06	7.36	0.9	48.29	4.91
6001437102	32.99	64.07	60-65%	Alameda	4521	10.46	71.91	17.63	29.4	11.72	7.9	0.15	41.87	8.96
6001437200	33.99	65.78	65-70%	Alameda	7489	10.5	72.53	16.97	27.97	18.09	5.53	0.89	41.52	5.98
6001437300	36.84	70.35	70-75%	Alameda	3277	10.28	77.27	12.45	38.11	13.82	12.3	0.03	30.21	5.52
6001437400	30.09	58.86	55-60%	Alameda	3485	13.06	72.37	14.58	54.43	13.97	3.93	0.4	25.77	1.49
6001437500	25.16	49.10	45-50%	Alameda	4531	15.96	74.99	9.05	66.06	13.68	2.87	0	16.58	0.82
6001437600	30.01	58.69	55-60%	Alameda	3536	10.61	71.92	17.48	42.76	13.12	6.05	0	34.31	3.76
6001437701	27.74	54.39	50-55%	Alameda	3773	15.56	79.62	4.82	59.13	9.28	12.88	1.38	15.13	2.2
6001437702	23.30	45.13	45-50%	Alameda	4295	14.06	81.47	4.47	75.83	4.68	6.54	0.19	10.22	2.54
6001437800	21.31	40.58	40-45%	Alameda	4997	8	78.37	13.63	39.08	19.45	2.9	0.96	33.78	3.82
6001437900	29.40	57.60	55-60%	Alameda	2321	13.1	76.82	10.08	59.37	11.98	5.26	0.56	19.69	3.15
6001438000	19.83	37.03	35-40%	Alameda	3952	11.26	81.15	7.59	26.97	27.23	8	0	33.5	4.3
6001438100	32.98	64.03	60-65%	Alameda	8307	15.59	73.28	11.14	40.77	15.97	7.21	0.81	30.39	4.84
6001438201	29.23	57.29	55-60%	Alameda	5144	11.86	73.68	14.46	62.09	7.83	6.42	0	18.5	5.15
6001438203	28.51	55.90	55-60%	Alameda	3888	7.15	73.17	19.68	21.27	15.77	5.45	0	54.58	2.93
6001438204	26.66	52.38	50-55%	Alameda	5838	7.69	73.06	19.25	32.8	12.92	6.18	0.65	40.89	6.56
6001438300	34.06	65.95	65-70%	Alameda	3767	9.56	74.62	15.82	32.47	5.5	8.79	0	50.92	2.34
6001438400	28.64	56.20	55-60%	Alameda	2757	13.82	73.16	13.02	31.41	17.3	9.14	0	39.57	2.58
6001440100	20.16	37.87	35-40%	Alameda	2799	8	61.2	30.8	20.69	39.91	2.93	0.25	34.94	1.29
6001440200	32.26	62.87	60-65%	Alameda	6125	13.26	78.99	7.76	69.68	3.53	6.69	0.15	19.04	0.91
6001440301	33.74	65.39	65-70%	Alameda	7596	10.56	76.67	12.77	30.34	21.27	5.5	0.16	38.44	4.28
6001440304	16.24	28.49	25-30%	Alameda	5035	11.56	69.71	18.73	12.99	6.12	9.22	0	68.44	3.24
6001440305	9.53	11.76	10-15%	Alameda	4190	10.76	68.57	20.67	16.54	18.83	2.36	0.55	57.39	4.32
6001440306	16.09	28.11	25-30%	Alameda	4322	9.37	75.91	14.72	7.73	12.42	4.1	0	69.99	5.76
6001440307	28.65	56.22	55-60%	Alameda	4748	10.32	61.88	27.8	18.87	19.06	4.72	0.21	53.77	3.37
6001440308	30.72	60.15	60-65%	Alameda	6171	8.01	73	18.99	26.8	15.38	3.22	0.05	49.27	5.28
6001440331	23.20	44.92	40-45%	Alameda	3276	13.71	74.18	12.12	25.03	11.54	1.68	0.15	56.01	5.59
6001440332	12.92	20.34	20-25%	Alameda	3505	10.7	74.75	14.55	8.19	8.82	1.83	0.49	75.58	5.11
6001440333	25.16	49.12	45-50%	Alameda	2982	6	75.52	18.48	4.46	15.83	2.21	0.1	71.53	5.87
6001440334	16.13	28.25	25-30%	Alameda	4414	8.27	75.58	16.15	13.98	14.5	9.56	0.16	57.36	4.44
6001440335	16.83	30.01	30-35%	Alameda	7051	14.69	75.89	9.42	1.76	19.03	3.45	0.4	65.13	10.24
6001440336	20.78	39.49	35-40%	Alameda	4437	10.41	73.88	15.71	18.39	18.1	8.72	0.63	50.78	3.38
6001441100	17.25	30.91	30-35%	Alameda	4625	9.21	69.47	21.32	20.02	44.65	0.93	0.52	27.31	6.57
6001441200	18.39	33.65	30-35%	Alameda	7277	15.51	70.81	13.67	18.58	35.29	4.67	0.3	34.9	6.25
6001441301	15.25	26.12	25-30%	Alameda	3301	14.15	74.43	11.42	5.97	18.3	6.51	0.82	64.76	3.64
6001441302	9.66	12.15	10-15%	Alameda	5937	12.87	69.31	17.82	13.14	26.75	2.69	0.2	53.16	4.06
6001441401	13.25	21.03	20-25%	Alameda	8082	17.09	69.03	13.88	9.96	20.56	1.15	0.31	62.7	5.31
6001441402	11.14	15.76	15-20%	Alameda	5407	14.93	71.17	13.91	9.23	16.83	2.4	0.28	67.47	3.79
6001441501	6.25	5.19	5-10%	Alameda	6546	9.35	73.75	16.9	8.1	12.68	2.38	0.29	71.45	5.1
6001441503	23.06	44.65	40-45%	Alameda	8013	18.17	73.47	8.36	3.47	8.77	1.97	0.86	82.95	1.97
6001441521	10.49	14.06	10-15%	Alameda	6175	12.68	72.24	15.08	7.16	16.19	1.59	0	71.2	3.85
6001441522	13.52	21.77	20-25%	Alameda	5233	11.27	73.15	15.57	12.25	13.32	6.67	0.25	65.38	2.14
6001441523	11.97	17.85	15-20%	Alameda	4418	19.31	76.28	4.41	6.43	11.72	2.35	0	77.46	2.04
6001441524	17.59	31.80	30-35%	Alameda	4215	20.9	71.39	7.71	2.54	7.9	2.28	0	85.53	1.76
6001441601	13.30	21.24	20-25%	Alameda	4982	12.89	71.02	16.1	16.82	27.54	9.03	0.32	43.38	2.91
6001441602	24.00	46.75	45-50%	Alameda	8113	13.61	71.38	15.01	17.71	21.78	1.77	0	57.27	1.45
6001441700	18.81	34.77	30-35%	Alameda	8527	14.78	74.97	10.25	20.3	25.19	4.14	0.3	46.7	3.37
6001441800	14.24	23.63	20-25%	Alameda	7543	14.56	75.05	10.39	11.68	34.47	1.87	0.24	49.91	1.83
6001441921	13.04	20.64	20-25%	Alameda	3909	10.41	81.25	8.34	25.74	16.35	6.7	1.89	41.52	7.8
6001441923	19.95	37.42	35-40%	Alameda	6250	16.22	71.09	12.69	9.33	14.78	2.86	0.5	67.34	5.18
6001441924	14.30	23.81	20-25%	Alameda	7481	14.74	74.46	10.8	11.82	18.02	2.93	0.43	62.13	4.68
6001441925	11.94	17.74	15-20%	Alameda	7291	10.82	84.86	4.32	7.53	14.74	6.05	0.16	68.36	3.15
6001441926	21.11	40.18	40-45%	Alameda	4595	18.87	77.24	3.9	32.95	8.68	3.83	0.52	49.55	4.46
6001441927	21.27	40.48	40-45%	Alameda	4492	17.5	72.75	9.75	9.71	13.65	3.25	0.42	67.01	5.97
6001442000	6.06	4.82	1-5% (lowest scores)	Alameda	3419	9.71	74.47	15.82	7.9	15.24	0.09	0.53	74.03	2.22
6001442100	13.26	21.08	20-25%	Alameda	5462	8.59	75.21	16.2	0.99	13.38	1.43	0.53	81.09	2.58

6001442200	11.02	15.53	15-20%	Alameda	7473	11.87	70.43	17.7	5.99	19.24	1.42	0.33	71.27	1.74
6001442301	22.91	44.26	40-45%	Alameda	5496	9.72	79.8	10.48	18.38	17.63	3.89	0.69	55.12	4.29
6001442302	16.97	30.42	30-35%	Alameda	6366	14.53	73.88	11.59	11.39	17.22	5.01	0.36	60.3	5.72
6001442400	19.58	36.43	35-40%	Alameda	6822	8.46	80.46	11.08	24.71	20.64	4.09	0.21	48.96	1.39
6001442500	23.30	45.15	45-50%	Alameda	7374	9.55	76.13	14.32	23.39	16.98	3.39	0.57	49.51	6.16
6001442601	12.92	20.31	20-25%	Alameda	4160	8.27	76.25	15.48	20.6	35.1	0.38	0	40.63	3.29
6001442602	16.45	28.91	25-30%	Alameda	5059	14.41	75.09	10.5	27.89	33.7	3.62	0.08	30.92	3.8
6001442700	12.89	20.20	20-25%	Alameda	3048	12.89	71.95	15.16	15.35	36.88	5.05	0.36	39.37	2.99
6001442800	21.73	41.62	40-45%	Alameda	2952	9.01	74.29	16.7	16.7	30.86	1.46	0.14	46.51	4.34
6001442900	18.30	33.48	30-35%	Alameda	7761	12.36	74.8	12.85	17.03	26.49	3.8	1.37	49.26	2.05
6001443001	20.63	39.16	35-40%	Alameda	2891	10.79	80.53	8.68	35.42	22.79	4.91	0.35	34.69	1.83
6001443002	25.42	49.74	45-50%	Alameda	6930	9.9	77.66	12.44	17.49	17.29	2.99	0.17	58.31	3.75
6001443102	11.42	16.41	15-20%	Alameda	5065	10.54	73.62	15.83	5.59	14.41	0.57	0	76.92	2.51
6001443103	8.47	9.62	5-10%	Alameda	4107	10.35	72.02	17.63	3.34	11.03	0.19	0.71	81.74	2.99
6001443104	12.18	18.36	15-20%	Alameda	5620	11.32	76.57	12.12	1.16	17.97	0.34	0	77.62	2.92
6001443105	14.48	24.31	20-25%	Alameda	4785	8.69	75.76	15.55	2.45	13.94	1.55	0	79.37	2.7
6001443200	4.91	2.91	1-5% (lowest scores)	Alameda	4053	5.95	73.43	20.63	0.74	18.01	0	0.35	75.99	4.91
6001443301	16.72	29.68	25-30%	Alameda	4355	12.74	74.03	13.23	8.77	25.46	1.45	0	59.89	4.43
6001443321	13.39	21.44	20-25%	Alameda	3368	19.8	74.91	5.29	9.2	5.05	3.8	0	79.9	2.05
6001443322	12.89	20.18	20-25%	Alameda	3308	14.6	72.49	12.91	4.53	19.17	1.63	0.67	70.71	3.3
6001444100	21.13	40.25	40-45%	Alameda	7556	6.55	72.68	20.76	28.82	39.77	1.1	0.12	27.55	2.63
6001444200	17.13	30.62	30-35%	Alameda	7112	10.42	77.02	12.56	33.34	19.35	5.43	0.69	36.11	5.09
6001444301	13.56	21.85	20-25%	Alameda	3973	10.5	75.84	13.67	32.44	32.9	4.66	0	26.83	3.17
6001444302	24.81	48.32	45-50%	Alameda	5185	11.42	78.69	9.89	39.75	14.19	4.55	0.52	38.35	2.64
6001444400	20.13	37.76	35-40%	Alameda	5477	14.19	76.43	9.38	53.41	14.31	4.93	0.44	21.44	5.48
6001444500	32.85	63.72	60-65%	Alameda	7518	12.6	79.22	8.18	47.58	18.45	4.08	0.15	26.56	3.18
6001444601	33.37	64.74	60-65%	Alameda	5787	11.87	70.95	17.18	25.33	31.88	1.37	0.09	38.29	3.04
6001444602	18.35	33.60	30-35%	Alameda	4563	14.99	76.31	8.7	11.51	15.95	5.96	0.11	63.79	2.67
6001450101	15.50	26.65	25-30%	Alameda	5750	17.91	77.9	4.19	8.07	31.95	4.43	0.38	47.39	7.77
6001450102	14.18	23.46	20-25%	Alameda	5664	14.83	78.07	7.1	17.62	24.75	6.36	1.29	41.83	8.16
6001450200	9.91	12.71	10-15%	Alameda	5244	17.37	73.34	9.29	10.37	41.9	3.13	0	38.87	5.74
6001450300	13.25	21.05	20-25%	Alameda	5212	14.87	74.62	10.51	20.64	49.94	3.13	0.12	23.39	2.78
6001450400	16.65	29.48	25-30%	Alameda	7286	13.41	74.44	12.15	13.9	48.34	3.34	0	27.13	7.29
6001450501	9.62	12.03	10-15%	Alameda	3156	13.21	72.37	14.42	8.9	59.54	0	0.63	25.57	5.35
6001450502	5.54	3.91	1-5% (lowest scores)	Alameda	5490	12.9	74.01	13.1	8.83	46.03	1.48	0.95	39.52	3.19
6001450601	6.56	5.89	5-10%	Alameda	3641	6.67	76.38	16.95	6.12	50.62	1.68	0.52	36.09	4.97
6001450602	20.30	38.24	35-40%	Alameda	10265	8.88	76.36	14.76	8.24	50.94	2.67	0.1	34.58	3.47
6001450603	17.95	32.56	30-35%	Alameda	5155	13.81	72.67	13.52	11.77	55.25	1.38	0.37	29.35	1.88
6001450604	6.26	5.26	5-10%	Alameda	5505	8.61	75.62	15.77	9.46	58.2	0.53	0	27.67	4.14
6001450605	9.54	11.79	10-15%	Alameda	3893	9.89	71.82	18.29	9.2	61.98	0.92	0.05	25.66	2.18
6001450606	6.32	5.37	5-10%	Alameda	6254	11.62	74.24	14.13	6.16	60.19	0.64	0.66	28.14	4.22
6001450607	20.42	38.49	35-40%	Alameda	5717	11.77	74.09	14.13	12.03	53.51	2.22	0	27.74	4.5
6001450701	6.12	4.95	1-5% (lowest scores)	Alameda	8596	8.93	75.4	15.67	6.18	55.83	2.07	0.12	32.21	3.59
6001450741	8.14	8.84	5-10%	Alameda	5852	8.63	76.3	15.07	19.77	53.16	2.72	0.46	19.28	4.61
6001450742	6.64	6.00	5-10%	Alameda	5436	10.17	73.16	16.67	10.08	58.19	0.59	0	25.63	5.52
6001450743	17.70	32.07	30-35%	Alameda	6684	16.89	79.14	3.96	5.79	19.75	5.34	0.66	62.73	5.73
6001450744	13.02	20.57	20-25%	Alameda	6273	11.02	67.93	21.06	7.22	56.16	1.1	0.67	31.37	3.48
6001450745	20.06	37.67	35-40%	Alameda	6712	13.13	73.06	13.81	9.92	29.29	0.39	0.28	58.64	1.47
6001450746	9.86	12.54	10-15%	Alameda	3525	10.21	70.92	18.87	11.97	57.59	0.31	0	26.72	3.4
6001450750	11.58	16.81	15-20%	Alameda	5630	17.34	73.06	9.61	9.34	24.44	7.37	0	54.81	4.03
6001450751	13.21	20.95	20-25%	Alameda	11119	20.79	71.62	7.59	3.08	12	1.25	0.04	81.31	2.32
6001450752	15.51	26.74	25-30%	Alameda	7343	15.84	77.23	6.93	7.39	20.7	4.63	0.08	62.94	4.25
6001451101	16.38	28.72	25-30%	Alameda	8692	12.87	77.69	9.43	14.52	61.61	1.69	0.01	18.44	3.73
6001451102	3.64	1.11	1-5% (lowest scores)	Alameda	4003	8.57	73.82	17.61	9.39	77.19	0.32	0.62	7.24	5.22
6001451201	16.05	27.96	25-30%	Alameda	7695	15.28	75.93	8.78	20.26	57.6	1.26	0.38	14.96	5.55
6001451202	11.91	17.66	15-20%	Alameda	5188	11.08	79.66	9.25	14.69	61.03	0.79	0.29	15.96	7.25
6001451300	13.26	21.13	20-25%	Alameda	6903	12.85	75.47	11.68	19.63	63.41	1.38	0	9.01	6.58
6001451401	18.78	34.69	30-35%	Alameda	6191	12.26	70.26	17.48	20.37	56.84	5.44	0	13.25	4.1

6001451403	10.03	13.01	**10-15%**	Alameda	2308	16.07	70.23	13.69	27.82	56.41	1.56	0	8.93	5.29
6001451404	20.51	38.80	**35-40%**	Alameda	7094	15.05	76.77	8.18	47.55	39.27	4.51	0.04	6.17	2.45
6001451501	18.90	34.92	**30-35%**	Alameda	4693	14.36	67.8	17.84	16.26	67.44	0.89	0.11	9.38	5.92
6001451503	12.57	19.36	**15-20%**	Alameda	6182	14.36	72.5	13.13	15.35	63.04	1.83	0.08	14.04	5.66
6001451504	11.70	17.08	**15-20%**	Alameda	1709	16.38	69.98	13.63	19.08	54.53	0.99	0	23.93	1.46
6001451505	5.65	4.03	**1-5% (lowest scores)**	Alameda	3418	10.09	74.78	15.13	13.96	75.51	0.97	0.29	7.69	1.58
6001451506	16.15	28.32	**25-30%**	Alameda	3385	15.57	72.88	11.55	40.12	43.93	5.91	0	8.27	1.77
6001451601	11.25	16.04	**15-20%**	Alameda	5362	9.98	73.55	16.47	10.67	78.25	0.17	0	9.2	1.72
6001451602	12.65	19.54	**15-20%**	Alameda	6809	11.54	63.42	25.04	16.42	69.38	1.85	0.15	6.84	5.36
6001451701	7.87	8.27	**5-10%**	Alameda	3112	12.21	74.55	13.24	14.65	71.66	1.09	0.16	6.43	6.01
6001451703	6.34	5.42	**5-10%**	Alameda	4080	12.82	73.24	13.95	19.36	58.97	0	0.32	16.96	4.39
6001451704	7.29	7.26	**5-10%**	Alameda	4519	11.24	69.09	19.67	13.19	72.25	0.38	0.22	9.63	4.34
6001981900	NA	NA	**NA**	Alameda	58	0	100	0	13.79	86.21	0	0	0	0
6001982000	NA	NA	**NA**	Alameda	63	22.22	77.78	0	12.7	15.87	36.51	3.17	31.75	0
6001983200	28.20	55.32	**55-60%**	Alameda	583	2.57	85.59	11.84	8.06	52.83	9.09	1.54	24.18	4.29
6003010000	13.62	22.00	**20-25%**	Alpine	1039	9.05	61.02	29.93	12.51	53.03	0.87	30.22	0.96	2.41
6005000101	11.89	17.61	**15-20%**	Amador	3908	8.88	53.38	37.74	7.8	83.73	0.26	0.84	1.97	5.4
6005000102	15.45	26.53	**25-30%**	Amador	1982	7.82	64.78	27.4	8.53	80.78	0.3	0.55	3.53	6.31
6005000200	18.45	33.79	**30-35%**	Amador	4748	11.79	60.38	27.82	10.93	82.52	0.57	0.93	0.19	4.87
6005000301	17.66	31.96	**30-35%**	Amador	5105	2.9	85.03	12.07	31.52	46.52	14.99	1.55	1.51	3.92
6005000303	22.69	43.70	**40-45%**	Amador	5623	6.53	67.7	25.77	12.66	85.54	0.04	0.09	0.47	1.21
6005000304	27.86	54.65	**50-55%**	Amador	4597	10.38	72.09	17.53	8.98	85.38	0.22	0.61	0.48	4.33
6005000401	26.49	51.94	**50-55%**	Amador	4675	7.66	53.43	38.91	6.76	87.81	0.13	0.09	0.77	4.45
6005000402	19.63	36.57	**35-40%**	Amador	4639	5.45	64.82	29.73	18.32	77.28	0.37	0.97	1.45	1.62
6005000500	26.58	52.18	**50-55%**	Amador	3152	8.72	64.69	26.59	14.18	77.54	0.16	0	4.61	3.52
6007000102	13.06	20.69	**20-25%**	Butte	4032	13.94	65.38	20.68	13.02	79.56	0.42	0.17	1.02	5.8
6007000103	10.73	14.78	**10-15%**	Butte	5393	18.02	73.32	8.66	15.43	76.69	1.63	0.46	3.39	2.39
6007000104	12.93	20.37	**20-25%**	Butte	5517	10.35	72.96	16.69	21.01	69.73	3.92	0	3.88	1.47
6007000201	15.09	25.76	**25-30%**	Butte	4075	11.29	76.42	12.29	17.23	75.12	0.32	0.27	4.17	2.9
6007000202	22.66	43.60	**40-45%**	Butte	3703	8.78	72.29	18.93	18.09	72.51	2.08	0.14	3.05	4.13
6007000300	24.79	48.29	**45-50%**	Butte	4764	15.66	70.05	14.29	18.79	68.79	3.4	1.64	3.67	3.72
6007000401	14.01	23.08	**20-25%**	Butte	4186	15.79	74.08	10.13	22.46	65.72	0.17	0	9.27	2.39
6007000402	10.77	14.88	**10-15%**	Butte	7973	10.1	68.64	21.26	14.54	75.55	1.49	0.19	4	4.23
6007000501	13.97	22.93	**20-25%**	Butte	4793	8.66	78.24	13.1	21.47	67.62	1.19	0	3.96	5.76
6007000502	26.14	51.17	**50-55%**	Butte	4402	5.75	88.64	5.61	25.81	57.02	2.32	1.39	10.7	2.77
6007000601	10.75	14.80	**10-15%**	Butte	3530	12.44	73.34	14.22	11.42	77.14	0.11	0	6.68	4.65
6007000603	30.12	58.93	**55-60%**	Butte	3681	3.37	89.68	6.95	16.84	70.28	3.21	0	3.12	6.55
6007000604	25.60	50.11	**50-55%**	Butte	4245	9.85	87.21	2.94	21.98	58.82	5.75	0	7.63	5.82
6007000700	16.66	29.53	**25-30%**	Butte	4626	9.71	74.69	15.61	11.05	84.24	0.11	0	2.92	1.69
6007000800	11.69	16.99	**15-20%**	Butte	5664	14.09	67.92	17.99	9.5	85.28	0.44	0	1.2	3.58
6007000901	10.78	14.90	**10-15%**	Butte	2656	10.84	67.66	21.5	16.11	67.7	0.68	0	10.13	5.38
6007000903	24.39	47.59	**45-50%**	Butte	6697	11.99	75.41	12.6	24.32	57.13	4.79	0.81	10.45	2.49
6007000904	14.77	24.96	**20-25%**	Butte	7107	11.62	66.95	21.43	12.23	82	0.7	0	2.54	2.53
6007001000	35.66	68.65	**65-70%**	Butte	4122	7.54	87.55	4.9	14.31	73.9	4.66	1.04	1.99	4.1
6007001100	28.33	55.52	**55-60%**	Butte	4388	5.65	83.52	10.82	21.47	65.54	2.3	0.5	5.63	4.56
6007001200	29.28	57.44	**55-60%**	Butte	3706	5.53	84.97	9.5	17.57	76.36	0.16	0	1.16	4.75
6007001300	41.09	76.77	**75-80%**	Butte	3689	14.26	74.71	11.03	27.05	50.69	2.68	2.2	10.84	6.53
6007001400	10.56	14.31	**10-15%**	Butte	6088	12.47	67.33	20.2	16.51	81.19	0.03	0	1.72	0.54
6007001500	21.44	41.01	**40-45%**	Butte	5834	10.9	70.67	18.43	12.56	78.73	1.92	0	2.23	4.56
6007001600	9.99	12.90	**10-15%**	Butte	4753	7.3	67.6	25.1	9.97	80.69	0.55	0	1.94	6.86
6007001702	8.53	9.69	**5-10%**	Butte	5727	8.15	65.46	26.38	6.29	83.13	0	0.89	1.5	8.19
6007001703	8.42	9.43	**5-10%**	Butte	2731	13.29	61.33	25.38	8.39	88.83	0.18	0.44	0.44	1.72
6007001704	13.41	21.51	**20-25%**	Butte	3583	11.42	68.21	20.37	13.79	82.08	0	0	0	4.13
6007001800	19.12	35.45	**35-40%**	Butte	4356	9.85	65.89	24.27	5.81	86.91	0.8	0.48	0.69	5.3
6007001900	12.46	19.13	**15-20%**	Butte	2625	8.57	61.83	29.6	3.24	88.15	0.99	2.17	0.99	4.46
6007002000	18.42	33.71	**30-35%**	Butte	4974	13.69	62.2	24.11	9.19	84.36	0.04	0.66	0.04	5.71
6007002100	19.00	35.17	**35-40%**	Butte	3603	15.63	55.09	29.28	8.55	78.74	0.03	0.25	1	11.43
6007002200	26.52	52.03	**50-55%**	Butte	5138	9.85	64.81	25.34	8.82	85.38	0.06	0.49	2.43	2.82

6007002300	14.89	25.24	25-30%	Butte	4263	6.99	63.95	29.06	9.01	85.9	0.33	0	0.42	4.34
6007002400	31.49	61.47	60-65%	Butte	4660	7.79	57.38	34.83	9.68	77.06	0.26	2.21	1.87	8.93
6007002500	28.57	56.03	55-60%	Butte	5946	17.84	72.54	9.62	14.11	57.11	5.63	1.36	14.9	6.88
6007002601	13.23	21.00	20-25%	Butte	2599	12.12	51.33	36.55	8	79.95	1.27	0.35	1.39	9.04
6007002602	16.74	29.75	25-30%	Butte	3628	8.35	57.69	33.96	7.99	83.43	0.88	2.26	0	5.43
6007002700	23.31	45.17	45-50%	Butte	5953	12.3	69.73	17.97	8.85	81.71	0.25	0.57	4.47	4.15
6007002800	38.63	73.07	70-75%	Butte	3883	15.61	63.82	20.58	12.49	68.19	6.88	0.36	3.91	8.16
6007002900	24.71	48.16	45-50%	Butte	2907	11.46	71.72	16.82	8.39	51.08	1.86	1.89	27.28	9.49
6007003001	33.83	65.60	65-70%	Butte	2553	15.51	68.39	16.1	14.41	53.39	5.52	4.15	7.29	15.24
6007003002	35.34	68.02	65-70%	Butte	3158	11.91	74.98	13.11	17.73	52.63	0.85	2.66	14.72	11.4
6007003100	16.39	28.73	25-30%	Butte	4573	13.38	65.62	20.99	11.35	73.85	0.15	1.47	9.56	3.63
6007003200	26.77	52.52	50-55%	Butte	4210	15.39	64.3	20.31	35.56	51.02	1.78	4.37	1.16	6.1
6007003300	27.39	53.74	50-55%	Butte	4083	6.78	70.68	22.53	12.52	73.33	0.44	3.33	5.46	4.92
6007003400	33.01	64.08	60-65%	Butte	3681	16.54	69.14	14.32	49.36	47.79	0.05	0.22	0.54	2.04
6007003501	24.81	48.35	45-50%	Butte	3773	22.18	66.02	11.79	35.67	55.39	0	1.35	2.6	4.98
6007003502	31.73	61.89	60-65%	Butte	4495	16	67.21	16.8	39.51	58.67	0.16	0.11	1.47	0.09
6007003600	29.94	58.55	55-60%	Butte	4202	12.97	70.7	16.33	33.44	56.59	0	1.09	1.5	7.38
6007003700	44.92	81.91	80-85%	Butte	4889	9.92	73.33	16.75	13.89	61.59	1.02	0.49	20.07	2.95
6009000120	20.53	38.86	35-40%	Calaveras	4694	14.68	58.22	27.1	11.65	83.47	1.79	0	1.21	1.87
6009000121	15.01	25.57	25-30%	Calaveras	4483	5.71	63.69	30.6	8.14	84.01	0	1.41	0.31	6.13
6009000122	10.17	13.35	10-15%	Calaveras	3560	2.72	57.22	40.06	8.68	85.11	1.15	0.48	0.14	4.44
6009000210	21.03	40.03	40-45%	Calaveras	11100	7.41	69.64	22.95	17.71	76.14	0.29	0.13	1.47	4.27
6009000220	18.36	33.62	30-35%	Calaveras	6795	12.79	68.84	18.37	11.35	81.24	1.46	0.22	3.05	2.69
6009000300	25.74	50.48	50-55%	Calaveras	7496	10.89	61.13	27.99	12.17	76.32	0.67	0.29	1.6	8.95
6009000400	16.14	28.28	25-30%	Calaveras	2722	6.1	61.06	32.84	7.79	83.39	0.18	1.95	3.05	3.64
6009000501	8.11	8.79	5-10%	Calaveras	2776	17.11	50.94	31.95	11.17	87.72	0	0	0.43	0.68
6009000503	9.89	12.62	10-15%	Calaveras	1431	4.61	54.65	40.74	6.57	90.64	0	0	2.24	0.56
6009000504	NA	NA	NA	Calaveras	457	3.06	55.14	41.79	0.66	93.87	0.88	0	2.18	2.41
6011000100	33.41	64.81	60-65%	Colusa	5647	14.36	72.85	12.79	65.65	31.66	0	0.19	0.21	2.28
6011000200	31.10	60.85	60-65%	Colusa	5027	17.66	65.23	17.11	50.13	44.04	1.53	0.74	1.08	2.49
6011000300	27.44	53.87	50-55%	Colusa	5963	17.11	71.71	11.19	74.48	20.17	0.15	1.21	3.22	0.77
6011000400	18.45	33.80	30-35%	Colusa	2252	11.77	67.45	20.78	36.15	55.73	3.6	1.02	0.62	2.89
6011000500	24.54	47.86	45-50%	Colusa	2565	9.24	76.53	14.23	48.97	43.51	3.47	0	1.52	2.53
6013301000	31.04	60.70	60-65%	Contra Costa	5150	12.87	73.88	13.24	22.27	62.23	8.97	0	2.82	3.71
6013302005	33.67	65.23	65-70%	Contra Costa	7290	14.8	73.22	11.98	33.28	40.77	14.72	0.48	5.69	5.06
6013302006	27.47	53.90	50-55%	Contra Costa	3775	15.15	78.81	6.04	35.07	47.23	6.12	0	7.5	4.08
6013302007	25.78	50.55	50-55%	Contra Costa	6652	11.89	78.26	9.85	38.74	39.36	7.97	1.02	8.56	4.34
6013302008	24.22	47.23	45-50%	Contra Costa	8781	20.84	71.6	7.56	40.52	34.67	10.77	0.83	7.43	5.77
6013302009	26.46	51.84	50-55%	Contra Costa	7279	10.95	78.06	10.99	29.84	21.77	20.7	0	22.97	4.71
6013302010	16.50	29.10	25-30%	Contra Costa	11767	13.64	76.92	9.44	32.22	46.24	4.17	0.07	8.12	9.19
6013303102	26.15	51.24	50-55%	Contra Costa	9625	15.28	75.09	9.63	26.57	45.13	9.72	0	14.11	4.47
6013303103	33.42	64.85	60-65%	Contra Costa	12652	12.11	77.68	10.21	33.5	47.01	6.57	1.61	8.09	3.21
6013303201	23.35	45.35	45-50%	Contra Costa	12171	11.24	77.54	11.22	17.99	37.51	17.22	0.15	21.37	5.78
6013303202	19.78	36.91	35-40%	Contra Costa	7439	13.46	78.16	8.39	19.99	55.65	8	0	6.69	9.67
6013303203	27.71	54.34	50-55%	Contra Costa	10070	12.74	71.61	15.65	23.34	48.7	9.04	1.09	12.51	5.32
6013303204	35.37	68.10	65-70%	Contra Costa	4751	14.17	68.26	17.58	33.34	51.57	6.65	0	4.69	3.75
6013303205	20.70	39.28	35-40%	Contra Costa	8931	6.7	64.25	29.06	16.11	64.26	3.2	0	8.55	7.87
6013304001	20.61	39.08	35-40%	Contra Costa	5272	9.37	63.35	27.28	11.29	61.36	10.02	0	12.8	4.53
6013304002	23.07	44.68	40-45%	Contra Costa	1463	14.01	63.57	22.42	32.74	60.7	2.94	1.44	1.44	0.75
6013304003	13.87	22.67	20-25%	Contra Costa	3793	8.28	65.81	25.92	16.61	74.06	2.5	0.16	6.17	0.5
6013304004	9.15	10.94	10-15%	Contra Costa	4114	7.12	72.44	20.44	11.28	79.9	0.49	0	5.13	3.21
6013304005	11.11	15.70	15-20%	Contra Costa	8766	13.88	76.98	9.14	21.81	59.81	7.84	0	6.11	4.43
6013305000	55.30	92.74	90-95%	Contra Costa	6561	18.59	74.23	7.18	43.03	25.58	18.82	0.94	9.33	2.3
6013306002	37.83	71.82	70-75%	Contra Costa	3837	11.08	76.8	12.12	51.34	34.92	6.12	0.26	7.35	0
6013306003	41.02	76.69	75-80%	Contra Costa	5193	11.98	73.56	14.46	46.72	33.53	8.47	1.23	5.1	4.95
6013306004	34.86	67.35	65-70%	Contra Costa	3616	11.14	76	12.86	21.88	42.37	29.84	0	1.11	4.81
6013307101	14.93	25.39	25-30%	Contra Costa	4516	11.25	71.88	16.87	39.84	46.94	3.37	0.4	5.29	4.16
6013307102	42.73	79.06	75-80%	Contra Costa	5330	14.45	74.45	11.11	52.25	22.85	13.23	0	5.8	5.87

6013307201	37.87	71.89	70-75%	Contra Costa	3803	15.75	73.1	11.15	51.49	28.11	4.94	0	6.18	9.28
6013307202	42.01	78.06	75-80%	Contra Costa	4299	20.66	75.32	4.02	35.12	13.38	38.61	0.21	3.49	9.19
6013307204	25.11	48.94	45-50%	Contra Costa	4386	14.59	72.16	13.25	44.05	28.43	14.43	0.23	10.53	2.33
6013307205	38.77	73.18	70-75%	Contra Costa	7557	14.11	72.78	13.11	24.93	23.94	34.39	0.15	10.87	5.73
6013308001	40.26	75.39	75-80%	Contra Costa	7653	10.34	75.93	13.73	33.54	40.08	16.76	0.52	3.93	5.16
6013308002	31.14	60.92	60-65%	Contra Costa	4472	7.69	80.7	11.61	25	31.55	17.02	0	23.64	2.8
6013309000	46.04	83.30	80-85%	Contra Costa	3546	13.87	70.45	15.68	33.19	25.66	25.04	0	10.69	5.41
6013310000	48.63	86.28	85-90%	Contra Costa	6257	18.46	74.08	7.46	58.77	11.51	17.47	0	5.21	7.05
6013311000	47.99	85.45	85-90%	Contra Costa	5329	15.89	73.9	10.21	52.36	13.17	15.89	0.69	13.19	4.69
6013312000	56.51	93.58	90-95%	Contra Costa	2243	15.16	69.77	15.07	46.05	8.29	33.62	0.45	7.4	4.19
6013313101	42.44	78.61	75-80%	Contra Costa	7178	13.14	70.26	16.61	44.94	24.2	12.32	0.15	11.76	6.63
6013313102	36.89	70.37	70-75%	Contra Costa	4595	13.23	74.6	12.17	36.08	15.1	28.94	0	15.54	4.33
6013313103	28.44	55.80	55-60%	Contra Costa	8866	15.03	72.24	12.72	30.46	31.28	14.62	0	17.59	6.06
6013313203	24.33	47.44	45-50%	Contra Costa	3456	8.48	80.21	11.31	48.5	23.87	5.35	0.14	11.4	10.73
6013313204	39.04	73.54	70-75%	Contra Costa	5538	15.02	73.53	11.45	42.63	25.97	13.67	0.02	11.27	6.45
6013313205	27.55	54.02	50-55%	Contra Costa	1696	9.55	84.02	6.43	42.63	19.52	12.97	0	18.22	6.66
6013313206	39.36	73.88	70-75%	Contra Costa	6377	13.85	77.75	8.41	61.69	11.35	13.06	0	11.08	2.81
6013314102	42.71	79.00	75-80%	Contra Costa	6561	13.18	75.93	10.88	53.5	17.21	9.98	0.3	13.61	5.4
6013314103	40.17	75.26	75-80%	Contra Costa	5629	15.7	78.59	5.7	60.7	10.62	16.13	0.11	9.36	3.07
6013314104	49.04	86.79	85-90%	Contra Costa	9278	14.67	76.15	9.18	65.34	9.82	10.81	0.77	9.2	4.06
6013314200	46.37	83.75	80-85%	Contra Costa	7748	15.59	76.94	7.47	79.75	10.79	0.63	0.12	6.93	1.78
6013315000	40.36	75.59	75-80%	Contra Costa	3862	9.92	79.67	10.41	25.58	37.88	13.18	3.16	16.94	3.26
6013316000	22.90	44.24	40-45%	Contra Costa	1055	9.95	76.78	13.27	24.27	51.66	17.25	0	0.85	5.97
6013317000	19.84	37.08	35-40%	Contra Costa	2040	4.26	82.25	13.48	7.01	79.66	2.45	0.29	3.58	7.01
6013318000	17.69	32.02	30-35%	Contra Costa	3734	8.81	74.75	16.44	20.49	61.44	2.92	0	10.77	4.39
6013319000	14.02	23.11	20-25%	Contra Costa	8558	12.5	77.37	10.13	22.87	69.16	2.15	0	2.37	3.45
6013320001	37.68	71.60	70-75%	Contra Costa	3671	12.97	77.83	9.21	38.71	45.68	0.25	0	11.06	4.3
6013320003	10.64	14.50	10-15%	Contra Costa	2721	9.96	77.73	12.31	2.79	79.02	2.39	0	14.08	1.73
6013320004	24.17	47.10	45-50%	Contra Costa	6587	15.52	72.14	12.34	18.28	58.05	4.49	0	12.59	6.59
6013321101	15.91	27.60	25-30%	Contra Costa	6654	10.55	68.8	20.65	20.2	60.17	2.45	0.44	9.68	7.06
6013321102	4.76	2.66	1-5% (lowest scores)	Contra Costa	6913	8.55	70.26	21.19	10.91	68.83	3.53	0.17	11.88	4.69
6013321103	5.75	4.20	1-5% (lowest scores)	Contra Costa	4739	10.8	68.94	20.26	7.36	74.85	2.26	0.4	9.71	5.42
6013321200	18.13	33.01	30-35%	Contra Costa	5634	10.17	78.79	11.04	15.76	47.43	2.66	0	29.61	4.54
6013322000	13.75	22.33	20-25%	Contra Costa	6250	9.98	68.88	21.14	19.39	59.98	0.88	0.37	10.61	8.77
6013323000	10.16	13.33	10-15%	Contra Costa	4476	16.96	66.38	16.67	13.36	69.5	1.27	0	11.67	4.2
6013324001	12.48	19.20	15-20%	Contra Costa	5480	8.91	75	16.09	12.45	63.03	3.36	0	15.05	6.11
6013324002	19.43	35.99	35-40%	Contra Costa	5247	10.77	80.94	8.29	17.15	55.36	2.84	0	17.5	7.15
6013325000	13.18	20.85	20-25%	Contra Costa	6300	9.89	70	20.11	17.1	67.56	5.3	0	4.37	5.68
6013326000	3.18	0.78	1-5% (lowest scores)	Contra Costa	3810	13.57	63.78	22.65	5.51	80.21	1.89	0	8.55	3.83
6013327000	43.61	80.27	80-85%	Contra Costa	7430	11.18	73.61	15.21	38.44	42.37	0.82	0.59	11.2	6.58
6013328000	30.39	59.43	55-60%	Contra Costa	2340	2.44	69.83	27.74	20.21	50.3	4.15	0	20.73	4.62
6013329000	35.34	68.04	65-70%	Contra Costa	6115	9.5	76.43	14.06	35.09	46.67	4.6	0	8.7	4.94
6013330000	23.25	45.03	45-50%	Contra Costa	5592	11.03	74.07	14.9	27.13	50.54	0.64	0	14.95	6.74
6013331000	25.61	50.16	50-55%	Contra Costa	7360	12.58	68.44	18.98	29.42	47.6	5.03	0.63	14.43	2.91
6013332000	12.97	20.46	20-25%	Contra Costa	8763	14.25	70.22	15.53	25.52	53.82	1.21	0	11.65	7.81
6013333101	15.57	26.84	25-30%	Contra Costa	4441	11.69	70.82	17.5	21.66	61.36	0	0.2	12.93	3.85
6013333102	11.12	15.71	15-20%	Contra Costa	4274	9.29	73.35	17.36	15.58	57.32	2.57	0	16.35	8.17
6013333200	16.81	29.97	25-30%	Contra Costa	6070	11.22	71	17.78	20.91	66.44	0.51	0	9.72	2.42
6013334001	19.04	35.25	35-40%	Contra Costa	3914	12.03	72.18	15.79	21.64	53.88	1.74	0.41	14	8.33
6013334004	16.24	28.47	25-30%	Contra Costa	7945	13.92	67.14	18.94	19.21	63.25	5.83	0	8.46	3.26
6013334006	7.53	7.74	5-10%	Contra Costa	4755	8.85	71.88	19.26	13.54	59.33	4.42	0.19	18.28	4.25
6013334200	6.50	5.77	5-10%	Contra Costa	7652	10.73	61.8	27.47	5.96	77.25	4.09	0	7.33	5.37
6013335000	17.18	30.72	30-35%	Contra Costa	3483	13.81	72.55	13.64	24	57.59	3.53	0	9.36	5.51
6013336101	33.40	64.80	60-65%	Contra Costa	5236	11.34	82.98	5.67	56.57	15.58	4.3	0.21	21.75	1.59
6013336102	32.31	62.93	60-65%	Contra Costa	7319	16.4	75.95	7.65	51.28	19.29	8.91	0.22	13.14	7.16
6013336201	41.30	77.08	75-80%	Contra Costa	4056	14.74	69.82	15.43	48.84	23.57	5.74	0.2	17.06	4.59
6013336202	34.08	65.99	65-70%	Contra Costa	6222	21.31	75.31	3.38	71.76	12.09	2.19	0	11.25	2.72
6013337100	12.29	18.72	15-20%	Contra Costa	3403	7.35	77.52	15.13	19.28	53.22	5.41	0.38	15.84	5.88

6013337200	17.82	32.30	30-35%	Contra Costa	8470	12.85	70.87	16.28	29.02	45.88	3.27	0	15.42	6.41
6013337300	9.57	11.90	10-15%	Contra Costa	6097	13.97	61.57	24.45	9.94	67.74	2.28	0	14.32	5.72
6013338101	20.94	39.89	35-40%	Contra Costa	5352	11.34	76.03	12.63	43.89	41.07	3.12	0.13	9.25	2.54
6013338102	7.97	8.42	5-10%	Contra Costa	3600	11.97	71.44	16.58	18.17	63.06	1.58	0	8.59	8.61
6013338201	9.37	11.30	10-15%	Contra Costa	4144	9.97	66.05	23.99	8.33	68.58	6.18	0	12.64	4.27
6013338203	10.73	14.76	10-15%	Contra Costa	5685	10.61	78.82	10.57	11.28	52.42	2.13	0	28.27	5.91
6013338204	6.13	4.97	1-5% (lowest scores)	Contra Costa	6817	16.05	64.08	19.88	10.84	56.1	2.85	0	23.93	6.29
6013338301	8.56	9.76	5-10%	Contra Costa	2990	14.72	60.7	24.58	6.19	71.44	0.77	0	15.28	6.32
6013338302	6.73	6.23	5-10%	Contra Costa	5996	7.94	69.45	22.62	12.73	67.65	0.47	0	15.68	3.49
6013339001	19.70	36.74	35-40%	Contra Costa	3694	8.36	83.95	7.69	18.84	57.82	3.84	0	13.05	6.44
6013339002	14.88	25.21	25-30%	Contra Costa	6934	8.68	76.26	15.06	9.56	65.09	0.72	0	16.44	8.19
6013340001	18.68	34.47	30-35%	Contra Costa	6154	16.14	67.57	16.3	12.45	64.35	2.94	0.11	15.62	4.53
6013340002	6.19	5.09	5-10%	Contra Costa	7789	10.53	69.82	19.66	9.68	73.94	0.1	0.27	10.42	5.6
6013341000	6.42	5.56	5-10%	Contra Costa	5240	11.37	70.57	18.05	9.89	73.7	0.73	0	12.67	3.02
6013343001	11.40	16.38	15-20%	Contra Costa	4850	10.31	70.12	19.57	9.88	72.39	1.46	0.02	9.49	6.76
6013343002	4.77	2.67	1-5% (lowest scores)	Contra Costa	4859	13.4	66.02	20.58	15.25	60.47	2.28	0	15.7	6.3
6013343003	3.98	1.48	1-5% (lowest scores)	Contra Costa	3969	8.29	70.87	20.84	5.95	77.85	0	0.43	12.07	3.7
6013345101	6.49	5.74	5-10%	Contra Costa	5781	14.76	71.77	13.48	15.41	49.02	3.11	0.42	29.08	2.96
6013345102	5.78	4.25	1-5% (lowest scores)	Contra Costa	3907	15.18	70.57	14.26	5.32	57.77	1.97	2.25	28.49	4.2
6013345103	2.50	0.47	1-5% (lowest scores)	Contra Costa	4992	7.73	72.8	19.47	6.89	59.38	5.79	0	22.04	5.91
6013345105	6.90	6.59	5-10%	Contra Costa	6525	14.38	70.97	14.65	9.85	72.92	0.34	0.09	11.97	4.83
6013345108	5.43	3.72	1-5% (lowest scores)	Contra Costa	7299	13.36	72.68	13.96	5.89	49.82	1.56	0	35.65	7.08
6013345111	11.84	17.47	15-20%	Contra Costa	5217	16.22	74.35	9.43	8.38	31.59	2.61	0.25	51.98	5.19
6013345112	3.13	0.74	1-5% (lowest scores)	Contra Costa	6455	14.08	73.99	11.93	6.74	50.98	0	0	38.76	3.52
6013345113	1.90	0.20	1-5% (lowest scores)	Contra Costa	4548	14.34	70.71	14.95	2.88	61.19	0.84	0	31.33	3.76
6013345114	3.54	1.05	1-5% (lowest scores)	Contra Costa	6687	9	62.73	28.26	3.47	83.15	1.59	0	9.32	2.48
6013345115	5.48	3.82	1-5% (lowest scores)	Contra Costa	5910	8.46	76.82	14.72	7.36	47.66	1.08	0	39.71	4.18
6013345116	4.78	2.72	1-5% (lowest scores)	Contra Costa	2794	12.53	76.81	10.67	12.63	54.08	1.83	0.29	27.52	3.65
6013345202	8.54	9.72	5-10%	Contra Costa	7688	12.6	77.64	9.76	9.39	55.62	2	0.21	25.62	7.15
6013345203	4.50	2.29	1-5% (lowest scores)	Contra Costa	6743	12.07	67.25	20.67	6.64	83.64	1.38	0	5.98	2.36
6013345204	2.29	0.38	1-5% (lowest scores)	Contra Costa	3763	12.89	66.81	20.3	7.55	87.11	0	0	4.81	0.53
6013346101	2.39	0.40	1-5% (lowest scores)	Contra Costa	3404	13.22	61.28	25.5	3.73	73.27	2.29	0	17.6	3.11
6013346102	3.12	0.73	1-5% (lowest scores)	Contra Costa	5610	6.29	71.25	22.46	9.73	72.66	0.09	0.14	14.3	3.08
6013346201	1.82	0.18	1-5% (lowest scores)	Contra Costa	7859	7.58	65.86	26.56	4.33	81.98	1.16	0	10.47	2.06
6013346203	7.84	8.21	5-10%	Contra Costa	4123	12.88	67.33	19.79	4.51	82.17	0.92	0	8.46	3.93
6013346204	2.54	0.48	1-5% (lowest scores)	Contra Costa	7708	12.64	71.91	15.45	5.46	76.44	1.21	0	13.09	3.8
6013347000	2.61	0.50	1-5% (lowest scores)	Contra Costa	6426	9.52	67.3	23.17	6.66	80.39	0.61	0	6.71	5.63
6013348000	4.73	2.57	1-5% (lowest scores)	Contra Costa	5066	11.49	70.43	18.08	3.26	79.06	0.51	0.12	13.38	3.67
6013349000	11.88	17.60	15-20%	Contra Costa	5554	10.37	69.64	19.99	8.34	76.34	0.97	0.18	10.66	3.51
6013350000	6.42	5.55	5-10%	Contra Costa	6111	7.81	74.32	17.87	11.37	68.5	0.29	0	14.45	5.38
6013351101	1.86	0.19	1-5% (lowest scores)	Contra Costa	2683	0	13.16	86.84	0.93	86.73	0.37	0	11.29	0.67
6013351102	6.34	5.40	5-10%	Contra Costa	3791	0	9.15	90.85	2.4	87.58	0.16	0.4	9.13	0.34
6013351103	5.48	3.83	1-5% (lowest scores)	Contra Costa	2012	0	8.75	91.25	0.7	91.85	0.05	0	6.01	1.39
6013351200	1.25	0.04	1-5% (lowest scores)	Contra Costa	6292	16.02	65.46	18.52	10.31	72.62	0.1	0	11.03	5.94
6013352101	1.93	0.23	1-5% (lowest scores)	Contra Costa	3406	6.96	74.54	18.5	13.3	62.51	1.41	0.41	16.21	6.17
6013352102	1.79	0.14	1-5% (lowest scores)	Contra Costa	5669	9.05	72.57	18.38	8.84	70.12	0.19	0	16.98	3.86
6013352201	4.84	2.79	1-5% (lowest scores)	Contra Costa	6658	7.96	74.26	17.78	6.22	70.43	0.54	0	18.71	4.1
6013352202	3.85	1.27	1-5% (lowest scores)	Contra Costa	2758	5.87	69.87	24.26	2.97	71.21	0.29	0.04	19.32	6.16
6013353001	4.07	1.66	1-5% (lowest scores)	Contra Costa	4008	12.15	68.39	19.46	3.07	68.41	2.54	0	19.49	6.49
6013353002	1.64	0.10	1-5% (lowest scores)	Contra Costa	4397	11.87	66	22.13	4.37	74.57	1.41	0	14.78	4.87
6013354001	5.47	3.79	1-5% (lowest scores)	Contra Costa	2136	8.15	68.21	23.64	3.14	73.08	0	0	18.4	5.38
6013354002	6.69	6.14	5-10%	Contra Costa	7169	8.47	63.65	27.88	6.75	74.08	1.26	0	13.08	4.83
6013355107	26.25	51.44	50-55%	Contra Costa	5361	12.7	69.39	17.91	32.23	36.69	15.56	0.24	10.24	5.04
6013355108	20.87	39.75	35-40%	Contra Costa	13457	9.09	79.01	11.9	27.55	16.91	28.8	0	16.67	10.08
6013355109	19.05	35.26	35-40%	Contra Costa	7559	7.06	77.39	15.54	25.18	27.9	29.46	0	12.77	4.7
6013355110	14.92	25.33	25-30%	Contra Costa	4447	15.79	73.71	10.5	21.81	30.2	19.32	0	21.72	6.95
6013355111	14.34	23.94	20-25%	Contra Costa	6218	13.59	75.28	11.13	31.33	30.73	20.39	0	12.27	5.28
6013355112	5.36	3.62	1-5% (lowest scores)	Contra Costa	5687	7.97	64.96	27.08	7.16	69.91	1.41	0	16.44	5.08

6013355113	3.35	0.91	1-5% (lowest scores)	Contra Costa	4947	7.38	78.49	14.13	6.75	56.78	1.37	0	30.69	4.41
6013355114	3.92	1.39	1-5% (lowest scores)	Contra Costa	11848	12.84	78.87	8.29	7.97	34.33	0.84	0.02	50.53	6.3
6013355115	7.98	8.48	5-10%	Contra Costa	7981	18.26	76.18	5.56	9.28	21.1	5.59	0	57	7.03
6013355116	3.96	1.44	1-5% (lowest scores)	Contra Costa	8933	15.96	75.82	8.22	6.21	17.93	2.37	0.29	68.54	4.65
6013355117	4.19	1.83	1-5% (lowest scores)	Contra Costa	7292	12.25	82.16	5.6	1.55	15.37	0.23	0.18	78.48	4.18
6013355200	37.31	71.07	70-75%	Contra Costa	11140	17.31	74.78	7.92	24.16	17.24	11.61	0	41.46	5.54
6013355301	8.01	8.52	5-10%	Contra Costa	8635	13.51	72.45	14.04	12.22	67.72	0.23	0.14	13.9	5.78
6013355302	5.03	3.09	1-5% (lowest scores)	Contra Costa	3515	11.24	65.66	23.1	6.17	68.56	0.2	0	20.14	4.92
6013355304	7.79	8.13	5-10%	Contra Costa	8763	9.84	74.79	15.37	11.13	71.47	3.18	0.17	8.6	5.44
6013355306	5.74	4.19	1-5% (lowest scores)	Contra Costa	5315	6.28	72.78	20.94	7.85	82.54	1.39	0	4.03	4.2
6013356001	22.72	43.82	40-45%	Contra Costa	4379	9.64	73.46	16.9	30.71	22.08	9.2	0	25.66	12.33
6013356002	10.11	13.20	10-15%	Contra Costa	5522	6.41	74.18	19.41	17.55	36.13	8.26	0.18	27.73	10.16
6013357000	18.07	32.89	30-35%	Contra Costa	3317	7.99	78.26	13.75	19.69	65.57	6.09	0.78	2.62	5.25
6013358000	49.34	87.24	85-90%	Contra Costa	6285	16.21	72.32	11.47	32.03	24.33	18.23	0	18.68	6.73
6013359102	21.87	41.94	40-45%	Contra Costa	5982	12.25	70.43	17.32	28.28	23.96	15.71	0.15	26.16	5.73
6013359103	23.77	46.13	45-50%	Contra Costa	5237	7.2	74.79	18.01	12.53	31.6	9.87	0	37.12	8.88
6013359104	16.91	30.26	30-35%	Contra Costa	2086	9.35	74.26	16.4	14.19	19.8	20.71	0.29	39.84	5.18
6013359105	14.46	24.18	20-25%	Contra Costa	5006	11.61	74.13	14.26	11.63	17.26	18.72	0	47.64	4.75
6013359202	12.69	19.62	15-20%	Contra Costa	6043	9.47	67.12	23.42	20.78	41.5	7.81	0.23	21.88	7.79
6013359203	14.90	25.29	25-30%	Contra Costa	7248	10.72	74.66	14.62	18.53	27.81	11.93	0	38.08	3.64
6013359204	13.39	21.43	20-25%	Contra Costa	4915	6.63	74.4	18.96	18.72	14.97	14.51	0	48.1	3.7
6013360101	20.13	37.80	35-40%	Contra Costa	4405	10.26	65.15	24.59	19.57	42.59	8.15	0	18.09	11.6
6013360102	6.69	6.13	5-10%	Contra Costa	4115	7.73	67.75	24.52	20.36	41.07	9.57	0.34	25.81	2.84
6013360200	15.06	25.68	25-30%	Contra Costa	5173	10.25	74.1	15.66	28.67	29.52	10.17	0.21	26.05	5.37
6013361000	15.63	26.97	25-30%	Contra Costa	5093	10.47	72.83	16.71	25.96	32.12	12.35	0	24.84	4.73
6013362000	11.27	16.12	15-20%	Contra Costa	2798	9.54	68.41	22.05	15.01	51.47	18.12	0	9.29	6.11
6013363000	24.80	48.30	45-50%	Contra Costa	7408	10.77	73.45	15.78	25.34	31.68	19.71	0	18.6	4.67
6013364002	33.52	65.03	65-70%	Contra Costa	5531	10.99	76.53	12.48	41.87	20.36	14.32	0.14	18.77	4.54
6013365002	60.68	96.14	95-100% (highest scores)	Contra Costa	5590	17.87	75.17	6.96	68.55	4.04	18.26	0	7.1	2.04
6013365003	26.47	51.89	50-55%	Contra Costa	5164	6.76	79.57	13.67	20.08	21.9	24.98	0.83	22.23	9.97
6013366001	40.56	75.96	75-80%	Contra Costa	4514	13.62	77.4	8.97	55.27	7.33	7.69	0.55	19.63	9.53
6013366002	50.62	88.46	85-90%	Contra Costa	6627	15.04	75.48	9.48	68.78	4.09	8.92	0.09	16.69	1.43
6013367100	31.04	60.69	60-65%	Contra Costa	5342	12.06	72.88	15.07	36.09	7.66	29.43	0	20.76	6.07
6013367200	37.85	71.85	70-75%	Contra Costa	6042	11.7	79.69	8.61	50.61	7.28	15.51	0	24.46	2.14
6013368001	47.93	85.35	85-90%	Contra Costa	4817	10.38	82.67	6.95	80.22	6.83	4.24	0	4.71	4.01
6013368002	44.46	81.38	80-85%	Contra Costa	3782	12.4	82.58	5.02	73.11	3.91	11.45	0.5	9.02	2.01
6013369001	43.87	80.66	80-85%	Contra Costa	7254	13.39	69.26	17.36	47.49	11.91	12.66	0	25.71	2.23
6013369002	26.13	51.15	50-55%	Contra Costa	3045	9.75	79.84	10.41	41.58	24.73	14.58	0	14.09	5.02
6013370000	27.87	54.72	50-55%	Contra Costa	2850	7.96	73.33	18.7	19.54	43.33	13.02	0.28	18.95	4.88
6013371000	33.12	64.23	60-65%	Contra Costa	5960	11.96	75.15	12.89	46.74	23.88	10.45	0	16.09	2.84
6013372000	34.36	66.46	65-70%	Contra Costa	7541	12.94	74.84	12.21	56.92	12.64	6.94	0.11	19.4	4
6013373000	40.15	75.20	75-80%	Contra Costa	4468	17.77	69.7	12.53	76.72	3.07	10.03	0.92	9.04	0.22
6013374000	28.94	56.83	55-60%	Contra Costa	4752	13.15	76.01	10.84	51.05	17.78	18.41	0	9.24	3.51
6013375000	49.16	86.94	85-90%	Contra Costa	4897	18.91	77.11	3.98	71.55	7.51	12.46	0	5.47	3
6013376000	55.87	93.17	90-95%	Contra Costa	6245	16.09	77.97	5.94	73.35	1.79	12.44	0	11.51	0.9
6013377000	54.35	91.98	90-95%	Contra Costa	7323	14.23	72.62	13.15	49.43	8.89	20.57	1.12	17.98	2.01
6013378000	37.60	71.46	70-75%	Contra Costa	3327	6.64	66.94	26.42	18.46	68.05	3.94	0	5.77	3.79
6013379000	55.32	92.79	90-95%	Contra Costa	7003	17.79	73.63	8.58	63.93	3.24	24.06	0.1	1.44	7.23
6013380000	39.89	74.81	70-75%	Contra Costa	5931	11.65	74.98	13.37	23.07	27.45	23.59	0.46	19.17	6.27
6013381000	49.70	87.56	85-90%	Contra Costa	6521	14.25	77.09	8.66	54.06	6.01	28.71	1.27	5.54	4.42
6013382000	55.51	92.93	90-95%	Contra Costa	8159	15.09	72.63	12.28	26.6	10.82	49.12	0.13	9.4	3.92
6013383000	38.13	72.38	70-75%	Contra Costa	4877	13.12	67.4	19.48	18.04	47.92	5.84	0	24.67	3.53
6013384000	12.82	20.01	20-25%	Contra Costa	3913	10.48	63.81	25.71	9.51	60.29	6.31	0.26	16.94	6.7
6013385100	8.08	8.70	5-10%	Contra Costa	2940	8.84	61.73	29.42	7.99	57.07	4.42	0	24.05	6.46
6013385200	8.52	9.64	5-10%	Contra Costa	1308	13.91	61.01	25.08	5.28	51.07	3.29	0.31	33.33	6.73
6013386000	28.53	55.94	55-60%	Contra Costa	3538	6.76	76.88	16.37	9.89	30.36	7.66	0.82	46.24	5.03
6013387000	27.84	54.61	50-55%	Contra Costa	2928	14.99	67.55	17.45	10.42	43.14	4	0.2	33.91	8.33
6013388000	12.18	18.37	15-20%	Contra Costa	2741	10.69	75.19	14.12	10.14	50.42	2.59	0.66	30.46	5.73

6013389100	18.23	33.33	30-35%	Contra Costa	2271	11.45	74.24	14.31	12.33	35.84	7.18	0.22	36.99	7.44
6013389200	17.59	31.78	30-35%	Contra Costa	1779	10.74	80.21	9.05	23.61	20.46	3.43	2.47	47.05	2.98
6013390100	5.02	3.08	1-5% (lowest scores)	Contra Costa	2454	10.68	67.03	22.29	7.91	63.57	2.97	0	18.99	6.56
6013390200	5.93	4.56	1-5% (lowest scores)	Contra Costa	1797	10.13	64.39	25.49	7.01	61.32	1.11	0	26.1	4.45
6013391000	4.74	2.61	1-5% (lowest scores)	Contra Costa	2676	9.98	61.81	28.21	15.81	64.16	2.58	0	11.06	6.39
6013392000	2.12	0.28	1-5% (lowest scores)	Contra Costa	2653	8.78	65.21	26.01	4.26	75.24	2.07	0.34	12.25	5.84
6013392200	47.24	84.71	80-85%	Contra Costa	11304	13.02	74.11	12.87	43.91	16.38	16.86	0.28	18.79	3.77
6013392300	20.57	38.98	35-40%	Contra Costa	3126	10.36	76.3	13.34	7.87	8.03	16.12	0	66.41	1.57
6015000101	26.14	51.21	50-55%	Del Norte	4101	7.78	75.91	16.31	11.95	67.4	2.19	9.39	6.27	2.8
6015000102	29.44	57.68	55-60%	Del Norte	3302	11.96	62.14	25.89	17.47	55.12	2	12.17	5.48	7.75
6015000104	19.48	36.18	35-40%	Del Norte	2428	22.24	66.06	11.7	40.49	48.6	0	2.76	3.79	4.37
6015000105	21.39	40.85	40-45%	Del Norte	6714	12.51	73.32	14.16	12.21	77.61	1.37	1.27	2.92	4.62
6015000201	18.62	34.30	30-35%	Del Norte	6108	6.97	81.99	11.03	31.43	48.43	7.6	8.38	1.6	2.55
6015000202	19.71	36.75	35-40%	Del Norte	3591	10.14	61.71	28.15	12.31	68.31	4.71	3.95	2.28	8.44
6015000203	14.78	24.99	20-25%	Del Norte	1251	10.95	66.43	22.62	15.75	51.32	1.44	27.98	0	3.52
6017030200	11.50	16.63	15-20%	El Dorado	5591	9.52	79.36	11.13	43.91	46.54	0.14	0.66	7.25	1.5
6017030301	16.42	28.85	25-30%	El Dorado	2712	10.84	77.62	11.54	39.86	54.13	1.18	0.22	2.69	1.92
6017030302	14.28	23.75	20-25%	El Dorado	2859	9.13	73.98	16.89	13.61	73.87	2.66	0	4.79	5.07
6017030401	21.43	40.96	40-45%	El Dorado	3011	9.13	64.7	26.17	11.62	82.43	0.9	0	4.52	0.53
6017030402	23.94	46.65	45-50%	El Dorado	4368	10.23	76.03	13.74	23.47	65.16	1.67	0	6.57	3.14
6017030502	4.16	1.77	1-5% (lowest scores)	El Dorado	2551	9.41	77.38	13.21	8.47	86.36	0.55	0	1.29	3.33
6017030504	5.21	3.37	1-5% (lowest scores)	El Dorado	2460	8.9	69.84	21.26	8.82	82.28	0.04	0.24	0.98	7.64
6017030505	4.96	2.96	1-5% (lowest scores)	El Dorado	2398	7.51	77.4	15.1	11.18	83.03	0.33	0	0	5.46
6017030601	4.98	3.01	1-5% (lowest scores)	El Dorado	5446	8.65	70.07	21.28	2.44	92.86	0	0	0.51	4.19
6017030602	10.60	14.41	10-15%	El Dorado	7911	11.97	69.93	18.1	10.47	86.2	0.42	0.29	0.56	2.07
6017030603	11.70	17.06	15-20%	El Dorado	3668	8.34	68.05	23.61	7.09	85.8	1.44	0.14	2.62	2.92
6017030701	3.39	0.96	1-5% (lowest scores)	El Dorado	6167	9.32	72.95	17.72	6.41	82.8	0	1.12	7.69	1.99
6017030704	10.15	13.30	10-15%	El Dorado	9602	13.02	65.34	21.64	3.83	79.14	1.39	0.23	9.97	5.44
6017030706	3.33	0.90	1-5% (lowest scores)	El Dorado	6492	11.18	73.37	15.45	12.78	69.7	2.53	0	6.79	8.19
6017030709	2.34	0.39	1-5% (lowest scores)	El Dorado	4697	9.56	73.17	17.27	7.92	79.71	0.87	0	7.6	3.9
6017030710	5.57	3.92	1-5% (lowest scores)	El Dorado	5029	10.86	69.74	19.41	11.93	73.65	1.93	0	8.83	3.66
6017030801	4.25	1.98	1-5% (lowest scores)	El Dorado	4712	7.89	72.47	19.63	20.9	70.95	0.32	2.48	2.36	2.99
6017030803	9.41	11.46	10-15%	El Dorado	7443	6.89	66.16	26.95	15.79	78.38	0.05	0	3.87	1.91
6017030804	13.99	23.02	20-25%	El Dorado	6779	8.84	63.93	27.23	9.94	86.06	1.02	0.27	1.78	0.93
6017030807	4.22	1.94	1-5% (lowest scores)	El Dorado	4008	11.18	75.3	13.52	6.19	86.7	1.1	0.4	3.74	1.87
6017030808	4.21	1.89	1-5% (lowest scores)	El Dorado	6266	12.64	69.76	17.6	18.54	71.91	1.26	0	3.22	5.06
6017030809	9.34	11.27	10-15%	El Dorado	2497	10.81	72.01	17.18	15.38	78.29	1.4	0	1.96	2.96
6017030810	10.01	12.96	10-15%	El Dorado	3915	9.09	71.21	19.69	21.25	70.6	1.07	0	2.63	4.44
6017030901	8.05	8.62	5-10%	El Dorado	3251	9.07	68.81	22.12	8.64	81.14	0.06	3.2	4.28	2.68
6017030902	7.29	7.29	5-10%	El Dorado	4818	9.63	64.49	25.88	9.36	85.91	0.44	1.41	1.04	1.85
6017031000	21.97	42.08	40-45%	El Dorado	6284	8.67	69.22	22.1	13.86	80.27	0	1.03	4.36	0.48
6017031100	18.34	33.57	30-35%	El Dorado	5326	9.01	64.87	26.12	13.91	83.95	0.15	0.94	0	1.05
6017031200	21.38	40.80	40-45%	El Dorado	5138	9.83	66.08	24.09	15.43	78.4	1.83	0	2.86	1.48
6017031301	11.84	17.45	15-20%	El Dorado	3495	7.81	68.27	23.92	9.64	81.55	0.03	0.74	3.75	4.29
6017031302	14.26	23.74	20-25%	El Dorado	4562	13.52	67.95	18.52	8.35	88.73	1.01	0	1.25	0.66
6017031402	9.62	12.00	10-15%	El Dorado	5889	5.15	62.88	31.97	11.16	81.3	0.27	0.82	1.09	5.37
6017031404	7.19	7.16	5-10%	El Dorado	2475	10.06	61.13	28.81	7.27	86.02	1.25	0.89	1.17	3.39
6017031405	5.50	3.85	1-5% (lowest scores)	El Dorado	2500	9.48	65.88	24.64	6.48	87.96	0.24	0.76	1.48	3.08
6017031406	10.26	13.63	10-15%	El Dorado	5635	8.77	71.38	19.86	7.67	82.02	0	3.41	2.23	4.67
6017031502	13.80	22.48	20-25%	El Dorado	5953	6.22	65.14	28.64	4.47	88.49	0.3	0.35	1.14	5.24
6017031503	5.85	4.43	1-5% (lowest scores)	El Dorado	2467	8.84	67.98	23.19	5.59	87.88	0	0	4.46	2.07
6017031504	16.44	28.88	25-30%	El Dorado	5906	10.46	67.34	22.2	18.32	76.26	0.34	0.29	2.54	2.25
6017031600	21.36	40.75	40-45%	El Dorado	3326	12.33	73.69	13.98	42	39.72	0.15	0	16.51	1.62
6017031700	4.98	3.03	1-5% (lowest scores)	El Dorado	3078	15.01	72.29	12.7	5.13	71.99	0.97	0	15.14	6.76
6017031800	4.64	2.45	1-5% (lowest scores)	El Dorado	6895	15.94	70.24	13.82	8.09	63.45	1.07	0.29	22.95	4.15
6017031900	9.81	12.46	10-15%	El Dorado	94	7.45	64.89	27.66	3.19	91.49	0	0	5.32	0
6017032000	5.17	3.29	1-5% (lowest scores)	El Dorado	889	16.76	73.9	9.34	7.2	80.2	0.67	6.75	1.57	3.6
6019000100	60.37	95.92	95-100% (highest scores)	Fresno	3676	1.28	94.1	4.62	60.04	20.05	11.45	1.33	5.12	2.01

6019000200	80.75	99.95	95-100% (highest scores)	Fresno	2689	18.59	71.18	10.23	73.67	6.14	11.86	0.11	8.07	0.15
6019000300	76.40	99.80	95-100% (highest scores)	Fresno	4225	17.96	68.97	13.07	66.3	5.25	22.49	0.26	2.91	2.79
6019000400	75.30	99.68	95-100% (highest scores)	Fresno	5498	17.95	74.43	7.62	77.92	7.93	2.91	0.22	10.91	0.11
6019000501	55.37	92.83	90-95%	Fresno	2532	19.87	71.56	8.57	80.92	8.18	6.99	0	3.91	0
6019000502	60.03	95.70	95-100% (highest scores)	Fresno	3594	20.4	67.7	11.91	73.01	14.16	1.67	0.58	8.93	1.64
6019000600	64.45	97.62	95-100% (highest scores)	Fresno	4750	16.02	75.14	8.84	63.89	19.18	13.41	0	2.74	0.78
6019000700	81.33	99.96	95-100% (highest scores)	Fresno	3664	13.89	73.01	13.1	66.81	2.59	19.3	0.27	8.49	2.54
6019000800	67.30	98.47	95-100% (highest scores)	Fresno	1292	16.41	62.15	21.44	69.89	15.87	8.67	0.54	4.8	0.23
6019000901	70.21	99.13	95-100% (highest scores)	Fresno	2759	18.81	74.88	6.31	62.6	0.69	15.33	0	21.06	0.33
6019000902	75.46	99.71	95-100% (highest scores)	Fresno	5191	26.57	61.47	11.96	73.2	1.79	11.67	0	10.86	2.47
6019001000	80.55	99.92	95-100% (highest scores)	Fresno	4255	21.95	71.96	6.09	60.75	1.74	21.83	0.31	14.01	1.36
6019001100	93.18	100.00	95-100% (highest scores)	Fresno	2780	18.71	72.55	8.74	74.03	2.52	19.78	0.07	0.97	2.63
6019001201	72.68	99.42	95-100% (highest scores)	Fresno	5935	21.26	73.19	5.54	81.08	5.32	3.94	1.63	7.85	0.17
6019001202	79.17	99.90	95-100% (highest scores)	Fresno	4561	20.87	70.42	8.7	79.92	1.45	5.11	0	13.53	0
6019001301	71.21	99.24	95-100% (highest scores)	Fresno	5342	16.92	73.85	9.23	89.91	3.26	0.19	0.26	5.9	0.49
6019001303	59.83	95.59	95-100% (highest scores)	Fresno	2420	15.58	76.69	7.73	67.93	1.16	10.08	0.7	16.53	3.6
6019001304	61.39	96.34	95-100% (highest scores)	Fresno	5383	17.02	74.18	8.81	63.76	5.24	9.81	0	20.88	0.32
6019001407	51.29	89.21	85-90%	Fresno	4798	26.01	71.99	2	59.15	9.69	11.59	0.5	17.51	1.56
6019001408	36.01	69.15	65-70%	Fresno	2677	8.55	48.19	43.26	43.74	37.58	2.8	0.26	10.2	5.42
6019001409	28.25	55.41	55-60%	Fresno	2174	13.43	73.83	12.74	28.15	39.37	4.46	0	21.34	6.67
6019001410	47.39	84.88	80-85%	Fresno	12169	16.06	76.96	6.98	54.15	8.57	4.81	0.37	28.9	3.2
6019001411	48.19	85.72	85-90%	Fresno	6926	19.61	71.76	8.63	45.73	17.99	5.17	1.41	28.18	1.52
6019001412	32.07	62.53	60-65%	Fresno	2979	14.97	71.23	13.8	41.62	24.37	1.07	0.13	30.28	2.52
6019001413	32.51	63.33	60-65%	Fresno	6823	19.4	70.79	9.81	46.86	23.01	2.43	0	25.54	2.17
6019001414	37.91	71.97	70-75%	Fresno	8555	17.38	72.62	9.99	41.31	20.69	4.99	0	31.55	1.46
6019001500	69.73	99.04	95-100% (highest scores)	Fresno	2407	19.03	68.34	12.63	75.24	19.28	1.25	0	3.86	0.37
6019001600	50.09	88.00	85-90%	Fresno	5177	11.51	68.8	19.68	62.62	25.92	0.21	0	7.53	3.71
6019001700	55.24	92.68	90-95%	Fresno	6945	17.26	70.5	12.24	61.9	17.16	0.46	1.38	16.69	2.4
6019001800	61.28	96.31	95-100% (highest scores)	Fresno	4837	14.35	72.77	12.88	66.36	26.57	0.35	0	4.98	1.74
6019001900	59.52	95.42	95-100% (highest scores)	Fresno	2868	14.12	68.17	17.71	62.8	15.97	10.81	0.7	8.89	0.84
6019002000	67.94	98.58	95-100% (highest scores)	Fresno	6284	20.97	71.13	7.89	66.49	13.69	10.28	0.76	7.5	1.29
6019002100	54.37	92.01	90-95%	Fresno	6200	21.37	71.94	6.69	66.1	23.16	9.42	0	0.31	1.02
6019002200	44.30	81.24	80-85%	Fresno	3617	11.97	80.29	7.74	53.55	34.34	4.81	0.88	3.93	2.49
6019002300	56.48	93.56	90-95%	Fresno	3559	15.96	75.22	8.82	63.39	31.39	2.95	0.96	0.45	0.87
6019002400	68.07	98.63	95-100% (highest scores)	Fresno	4401	14.36	74.55	11.09	66.67	7.11	3.45	0	22.54	0.23
6019002501	53.98	91.64	90-95%	Fresno	4720	23.09	73.03	3.88	68.79	7.33	8.18	0	13.69	2.01
6019002502	67.59	98.51	95-100% (highest scores)	Fresno	4577	20.38	73.21	6.4	73.56	4.22	0.87	0.83	19.89	0.63
6019002601	65.62	97.97	95-100% (highest scores)	Fresno	4971	20.06	69.24	10.7	87.65	3.3	0.38	0	7.89	0.78
6019002602	58.10	94.54	90-95%	Fresno	3480	14.2	76.24	9.57	73.68	13.33	7.53	0	3.74	1.72
6019002701	50.46	88.34	85-90%	Fresno	4209	17.03	75.01	7.96	83.7	7.94	0.17	0.48	7.51	0.21
6019002702	55.31	92.78	90-95%	Fresno	4891	18.89	76.45	4.66	79.35	6.81	4.33	0	6.85	2.66
6019002800	61.55	96.43	95-100% (highest scores)	Fresno	4435	15.02	76.23	8.75	73.75	3.16	3.74	0.99	18.33	0.02
6019002903	47.94	85.40	85-90%	Fresno	3791	14.43	70.77	14.8	52.12	16.62	8.26	0	20.79	2.22
6019002904	42.88	79.27	75-80%	Fresno	3132	18.42	71.9	9.67	54.6	12.55	8.33	0.48	23.15	0.89
6019002905	48.10	85.64	85-90%	Fresno	3046	21.93	69.24	8.83	62.18	13.56	6.17	0	16.35	1.74
6019002906	41.30	77.07	75-80%	Fresno	5229	15.34	74.09	10.58	55.1	10.02	7.32	0.86	26.35	0.34
6019003001	57.25	94.06	90-95%	Fresno	3241	18.82	71.98	9.19	44.77	8.18	12.4	1.17	30.92	2.56
6019003003	49.18	86.98	85-90%	Fresno	4366	21.67	67.13	11.2	51.53	14.2	8.18	0.18	24.94	0.96
6019003004	38.95	73.35	70-75%	Fresno	2412	15.96	65.88	18.16	54.73	26.12	1.45	2.07	13.68	1.95
6019003102	41.93	77.95	75-80%	Fresno	7558	18.3	73.63	8.07	42.1	35.95	7.38	0	9.59	4.97
6019003103	28.55	56.00	55-60%	Fresno	5339	14.12	72.88	13	51.23	36.24	1.46	0.22	9.12	1.72
6019003104	34.74	67.16	65-70%	Fresno	4159	17.38	70.93	11.69	37.53	32.99	3.94	0.22	19.76	5.55
6019003201	52.94	90.85	90-95%	Fresno	5151	16.93	72.26	10.81	61.11	15.01	3.18	0.35	17.86	2.48
6019003202	52.45	90.48	90-95%	Fresno	5745	22.33	71.21	6.46	49.19	21.98	7.85	0	18.64	2.33
6019003301	48.94	86.65	85-90%	Fresno	3179	13.78	70.37	15.85	60.81	22.4	8.81	1.32	4.53	2.14
6019003302	45.10	82.15	80-85%	Fresno	4666	17.68	74.05	8.27	65.84	17.96	9.04	0.19	4.29	2.68
6019003400	64.87	97.78	95-100% (highest scores)	Fresno	5456	18.46	68.38	13.16	64.2	15.34	3.7	0.81	12.33	3.61
6019003500	47.10	84.57	80-85%	Fresno	4901	14.96	72.68	12.36	56.48	31.14	4.33	2.9	3.12	2.04

6019003600	22.70	43.72	40-45%	Fresno	4528	14.58	72.73	12.7	36.99	55.39	5.74	0	1.08	0.8
6019003701	50.81	88.68	85-90%	Fresno	3462	19.04	71.89	9.07	68.75	20.62	5.69	0.14	2.72	2.08
6019003702	52.67	90.66	90-95%	Fresno	4581	14.12	74.15	11.72	54.33	22.92	7.92	0.35	12.57	1.9
6019003803	36.37	69.73	65-70%	Fresno	10542	14.12	76.63	9.25	42.13	29.14	3.04	0	23.46	2.24
6019003804	34.09	66.02	65-70%	Fresno	6349	13.83	75.85	10.32	51.71	18.08	8.49	0.79	17.44	3.5
6019003805	60.34	95.89	95-100% (highest scores)	Fresno	7392	15.42	79.61	4.96	50.41	11.28	7.7	2.62	24.11	3.88
6019003807	53.72	91.46	90-95%	Fresno	3496	14.42	74.91	10.67	64.42	16.48	5.12	0	11.7	2.29
6019003808	35.34	68.00	65-70%	Fresno	5042	14.32	74.97	10.71	56.66	16.3	9.02	0.77	15.07	2.16
6019003809	51.66	89.64	85-90%	Fresno	5362	20.7	73.33	5.97	42.88	17.74	8.19	0	25.42	5.78
6019003810	31.61	61.66	60-65%	Fresno	5704	17.23	73.39	9.38	51.14	22.62	8.33	0	16.08	1.84
6019003900	38.00	72.18	70-75%	Fresno	6477	14.85	75.16	9.99	71.87	24.29	0.85	0	0.68	2.32
6019004001	42.23	78.37	75-80%	Fresno	8458	19.73	71.71	8.56	71.6	20.29	0.7	0	5.28	2.13
6019004002	48.04	85.50	85-90%	Fresno	7209	16.26	72.76	10.99	89.1	8.34	0	0.17	2.4	0
6019004100	33.62	65.20	65-70%	Fresno	3404	14.42	75.62	9.96	64.95	20.56	2.14	0.41	9.69	2.23
6019004205	48.46	86.13	85-90%	Fresno	6153	16.04	73.27	10.69	49.52	17.73	18.37	0.29	12.64	1.45
6019004207	51.66	89.62	85-90%	Fresno	11921	20.9	70.13	8.98	56.01	17.38	6.58	0	17.27	2.76
6019004208	18.66	34.42	30-35%	Fresno	7367	7.78	75.09	17.13	23.77	50.16	6.27	0	16.37	3.43
6019004210	22.54	43.36	40-45%	Fresno	3702	13.34	73.99	12.67	42.9	34.79	12.26	0.24	7.89	1.92
6019004211	31.84	62.09	60-65%	Fresno	6982	16.08	73.83	10.08	44.73	38.31	3.65	1.09	10.73	1.49
6019004212	37.48	71.34	70-75%	Fresno	12379	17.02	74.13	8.85	36.27	28.18	16.82	0	16.08	2.65
6019004213	21.13	40.27	40-45%	Fresno	3324	13.03	72.29	14.68	41.82	47.74	0.96	1.87	4.78	2.83
6019004214	14.36	23.97	20-25%	Fresno	4570	3.46	69.12	27.42	27.94	60.2	2.47	0	8.53	0.85
6019004215	32.65	63.54	60-65%	Fresno	4557	18.85	72.61	8.54	35.97	36.25	5.82	0	15.56	6.41
6019004216	35.42	68.28	65-70%	Fresno	3454	11.9	78.49	9.61	47.63	31.47	8.4	0	8.31	4.2
6019004301	14.00	23.07	20-25%	Fresno	4129	11.41	57.98	30.61	17.7	69.8	2.35	0	8.74	1.4
6019004302	19.08	35.34	35-40%	Fresno	5243	6.16	61.05	32.79	18.41	63.88	1.07	0	14.5	2.16
6019004303	19.80	36.95	35-40%	Fresno	4526	7.36	59.63	33.01	19	70.08	1.24	1.08	4.82	3.78
6019004404	61.50	96.38	95-100% (highest scores)	Fresno	3152	16.97	76.68	6.35	63.13	21.61	3.78	0.7	3.43	7.36
6019004405	16.13	28.21	25-30%	Fresno	3663	11.77	67.65	20.58	22.63	62.44	2.95	0	8.76	3.22
6019004406	19.90	37.29	35-40%	Fresno	5328	13.03	71.85	15.13	28.12	53.36	5.33	0.04	11.4	1.76
6019004408	21.44	40.99	40-45%	Fresno	3566	8.02	78.3	13.68	27.96	50.48	6.17	2.72	6.51	6.17
6019004409	36.37	69.72	65-70%	Fresno	3232	10.02	72.43	17.54	35.06	48.39	3.28	2.07	5.04	6.16
6019004503	29.52	57.90	55-60%	Fresno	5176	6.68	72.31	21	30.41	54.23	4.52	0.29	10.01	0.54
6019004504	46.08	83.32	80-85%	Fresno	5245	12.47	71.78	15.75	29.97	42.97	13.17	0	13.35	0.53
6019004505	43.75	80.42	80-85%	Fresno	5425	11.45	74.21	14.34	47.96	33.29	7.19	0.39	9.25	1.92
6019004506	25.81	50.63	50-55%	Fresno	3254	6.85	61.16	31.99	11.52	75.94	2.77	0.43	6.18	3.17
6019004601	23.14	44.84	40-45%	Fresno	3136	13.71	64.03	22.26	43.18	49.36	1.24	1.12	2.55	2.55
6019004602	24.21	47.21	45-50%	Fresno	2837	10.33	70.71	18.96	33.77	53.26	3.21	0	4.55	5.22
6019004701	41.41	77.28	75-80%	Fresno	6923	18.66	65.9	15.44	44.47	23.26	21	0.94	8.58	1.75
6019004703	40.22	75.32	75-80%	Fresno	4130	11.94	76.42	11.65	55.74	23.27	16.63	0	2.78	1.57
6019004704	48.27	85.83	85-90%	Fresno	5345	19.72	72.78	7.5	65.52	12.57	12.91	1.55	5.89	1.55
6019004801	33.48	64.93	60-65%	Fresno	4811	18.15	72.71	9.15	62.88	21.39	9.15	0	2.54	4.05
6019004802	41.97	78.00	75-80%	Fresno	4448	17.78	75.13	7.08	63.08	21.04	12.1	0.79	1.73	1.26
6019004901	29.63	58.06	55-60%	Fresno	4057	15.75	71.85	12.4	49.99	38.21	7.07	0.52	2.02	2.19
6019004902	25.41	49.71	45-50%	Fresno	2233	17.87	67.26	14.87	48.99	35.38	9.54	0.27	4.29	1.52
6019005000	44.88	81.87	80-85%	Fresno	4548	13.63	73.92	12.45	46.81	39.16	5.85	0	3.3	4.88
6019005100	55.13	92.61	90-95%	Fresno	6799	24.11	64.6	11.3	55.38	30.83	7.82	0.5	3.84	1.63
6019005202	58.65	94.86	90-95%	Fresno	3050	19.25	70.95	9.8	61.25	14.98	4.98	0	18.56	0.23
6019005203	51.34	89.26	85-90%	Fresno	5107	23.16	68.87	7.97	64.66	19.35	7.24	0.14	6.46	2.15
6019005204	44.99	81.97	80-85%	Fresno	4299	13.51	75.09	11.4	54.62	24.24	7.4	0.98	12.1	0.67
6019005301	44.84	81.82	80-85%	Fresno	6018	16.6	72.3	11.1	53.24	26.99	7.56	0.08	9.92	2.21
6019005302	37.96	72.08	70-75%	Fresno	5355	15.84	76.88	7.28	39.61	32.75	9.92	0	11.99	5.73
6019005304	39.87	74.77	70-75%	Fresno	5365	11.35	81.06	7.59	51.09	25.74	4.73	3.43	9.49	5.52
6019005305	45.03	82.00	80-85%	Fresno	3648	18.78	71.27	9.95	41.15	32.51	6.85	0.41	18.77	0.3
6019005403	46.47	83.81	80-85%	Fresno	4872	16.79	78.63	4.58	40.74	32.72	8.37	0	13.57	4.6
6019005405	33.56	65.09	65-70%	Fresno	4693	13.17	67.95	18.88	36.93	49.69	1.09	0	10.1	2.19
6019005406	33.54	65.07	65-70%	Fresno	4192	12.31	70.8	16.89	34.8	51.38	0.55	0	12.93	0.33
6019005407	23.89	46.46	45-50%	Fresno	3476	13.95	59.93	26.12	32.8	51.32	1.87	0	11.47	2.53

6019005408	53.50	91.31	90-95%	Fresno	2268	1.19	98.68	0.13	32.45	43.65	6.08	0.97	13.27	3.57
6019005409	35.61	68.58	65-70%	Fresno	3328	9.71	79.06	11.24	35.07	40.99	8.86	0.69	11	3.4
6019005410	42.76	79.10	75-80%	Fresno	3536	13.21	72.4	14.39	41.74	37.3	2.69	0.93	12.22	5.12
6019005503	5.51	3.88	1-5% (lowest scores)	Fresno	5706	9.27	66.09	24.64	15.86	62.39	1.81	0	17.93	2.02
6019005504	15.92	27.61	25-30%	Fresno	3384	15.34	75.38	9.28	18.56	52.6	2.93	0	22.4	3.52
6019005505	14.38	24.02	20-25%	Fresno	7095	9.68	77.8	12.52	20.8	53.04	0.85	1.14	18.96	5.21
6019005507	11.66	16.97	15-20%	Fresno	5503	6.94	79.87	13.19	29.62	54.15	2.09	0.02	12.9	1.22
6019005508	9.78	12.42	10-15%	Fresno	5671	14	73.62	12.38	23.35	50.84	2.01	0.07	21.19	2.54
6019005509	28.24	55.38	55-60%	Fresno	5128	12.83	73.11	14.06	24.59	56.26	4.33	1.27	11.15	2.4
6019005510	23.34	45.27	45-50%	Fresno	4983	7.14	67.83	25.03	25.11	52.64	4.31	0	13.75	4.19
6019005512	16.05	27.98	25-30%	Fresno	5376	13.76	75.6	10.64	25.54	59.28	0.33	0	11.12	3.72
6019005513	11.45	16.50	15-20%	Fresno	2995	15.16	72.55	12.29	18	66.51	1.57	0.83	10.85	2.24
6019005514	15.20	26.01	25-30%	Fresno	4041	13.04	65.7	21.26	15.71	63.92	8.22	0	9.55	2.6
6019005515	16.23	28.45	25-30%	Fresno	1820	11.21	70.71	18.08	21.65	64.4	2.14	2.14	8.46	1.21
6019005516	19.20	35.65	35-40%	Fresno	6180	15.7	71.13	13.17	28.37	56.04	5.15	0	7.43	3.03
6019005517	10.34	13.78	10-15%	Fresno	7978	18.25	67.92	13.83	14.54	60.22	0	0	17.5	7.75
6019005518	7.01	6.81	5-10%	Fresno	5790	22.25	69.55	8.2	23.39	64.25	1.73	0.22	8.86	1.55
6019005520	5.87	4.46	1-5% (lowest scores)	Fresno	2997	11.28	76.61	12.11	15.52	61.56	2.8	0.17	15.58	4.37
6019005522	10.67	14.56	10-15%	Fresno	4860	15.74	74.32	9.94	18.81	62.9	0	0	13.6	4.69
6019005524	10.44	13.94	10-15%	Fresno	4660	11.22	77.55	11.22	16.95	63.95	1.7	0	13.41	3.99
6019005525	12.94	20.40	20-25%	Fresno	1041	8.26	64.55	27.19	13.16	65.13	3.17	0	12.87	5.67
6019005602	41.87	77.84	75-80%	Fresno	4991	10.86	72.55	16.59	33.64	53.98	2.1	1.46	6.77	2.04
6019005605	18.61	34.25	30-35%	Fresno	1745	17.08	65.67	17.25	22.29	72.84	0.52	0	3.15	1.2
6019005606	31.05	60.74	60-65%	Fresno	4010	19.5	66.08	14.41	30.82	49.85	5.19	1.02	6.33	6.78
6019005607	40.10	75.09	75-80%	Fresno	4688	19.24	70.37	10.39	35.99	46.4	5.84	0	9.77	2.01
6019005608	39.61	74.33	70-75%	Fresno	3137	14.38	57.86	27.77	32.36	57.86	3.16	0	2.17	4.46
6019005701	24.86	48.45	45-50%	Fresno	3582	11.22	74.04	14.74	40.28	46.06	1.12	0.2	10.64	1.7
6019005702	11.73	17.18	15-20%	Fresno	5254	13.32	74.25	12.43	24.5	64.81	1.12	0	6.97	2.61
6019005703	17.88	32.43	30-35%	Fresno	5199	13.35	68.9	17.75	22.91	62.55	3.89	2.04	5.96	2.65
6019005704	34.86	67.36	65-70%	Fresno	5186	16.91	71.48	11.61	41.57	47.59	0.94	0	5.88	4.01
6019005801	20.45	38.55	35-40%	Fresno	4699	11	72.25	16.75	38.5	48.35	1.47	0.6	9.11	1.98
6019005802	13.33	21.32	20-25%	Fresno	4800	12.85	68.94	18.21	27.63	46.75	6.88	0	16.15	2.6
6019005804	35.68	68.68	65-70%	Fresno	6940	16.66	73.29	10.06	48.86	32.61	1.48	0	14.87	2.18
6019005805	29.76	58.22	55-60%	Fresno	6416	20.53	71.68	7.79	31.75	40.96	2.65	0.55	21.63	2.46
6019005904	21.44	41.00	40-45%	Fresno	6398	16.97	69.12	13.91	32.1	39.7	2.05	0	24.01	2.14
6019005905	16.88	30.17	30-35%	Fresno	7435	16.34	66.64	17.01	18.94	62.35	0.48	1.01	15.09	2.13
6019005906	19.46	36.04	35-40%	Fresno	2427	13.72	65.72	20.56	31.07	51.42	0	0.29	16.07	1.15
6019005907	15.77	27.26	25-30%	Fresno	3485	13.72	77.19	9.1	20.92	57.39	1.55	0	14.69	5.45
6019005909	11.44	16.48	15-20%	Fresno	8035	19	70.06	10.94	32.21	43.19	0.96	0	18.05	5.6
6019005911	12.66	19.55	15-20%	Fresno	6018	16.88	71.72	11.4	31.74	44.95	2.13	0	17.46	3.72
6019005912	12.95	20.45	20-25%	Fresno	5865	11.54	71.94	16.52	24.48	62.56	0	0.7	10.13	2.13
6019006000	36.94	70.49	70-75%	Fresno	9788	14.26	73.23	12.51	76.71	18.24	0.08	0	1.81	3.17
6019006100	45.66	82.79	80-85%	Fresno	8126	13.78	78.59	7.63	77.39	14.51	0	1.06	6.42	0.62
6019006201	52.15	90.19	90-95%	Fresno	2357	19.98	71.66	8.36	93.17	4.92	0.38	0.34	0.81	0.38
6019006202	35.53	68.44	65-70%	Fresno	6202	19.45	69.46	11.09	94.05	4.9	0	0	0.23	0.82
6019006300	33.05	64.12	60-65%	Fresno	7507	16.65	68.62	14.73	43.83	44.68	0.44	0.01	6.37	4.68
6019006402	12.78	19.86	15-20%	Fresno	2779	10.18	63.84	25.98	8.1	71.28	1.08	12.05	0.79	6.69
6019006403	16.64	29.45	25-30%	Fresno	6101	14.08	69.41	16.51	29.52	66.28	0.54	0.84	2.44	0.38
6019006404	10.54	14.26	10-15%	Fresno	4731	5.33	73.52	21.16	11.46	76.41	1.23	3.47	2.48	4.97
6019006405	8.78	10.14	10-15%	Fresno	5217	13.97	61.87	24.15	16.02	71.65	0.46	1.48	6.59	3.8
6019006501	51.79	89.79	85-90%	Fresno	6871	22.53	70.32	7.15	93.38	4.37	1.75	0.25	0.26	0
6019006502	50.99	88.86	85-90%	Fresno	4810	21.39	68.96	9.65	94.01	5.38	0	0	0.6	0
6019006602	59.68	95.51	95-100% (highest scores)	Fresno	6083	18.61	68.8	12.59	89.3	7.89	0	0.05	1.79	0.97
6019006603	47.73	85.14	85-90%	Fresno	2312	15.79	76.47	7.74	61.72	28.68	3.89	0.17	3.07	2.47
6019006604	54.80	92.35	90-95%	Fresno	7768	15.82	75.39	8.79	88.39	6.23	0	0.12	1.93	3.33
6019006700	49.29	87.15	85-90%	Fresno	6345	15.52	68.83	15.65	63.99	22.47	2.74	0	6.48	4.32
6019006802	66.35	98.17	95-100% (highest scores)	Fresno	3339	12.01	73.23	14.76	82.12	14.17	0.75	0	0.9	2.07
6019006900	51.08	88.96	85-90%	Fresno	3293	13.94	74.92	11.14	82.24	12.24	0	0	3.28	2.25

6019007002	53.14	90.97	**90-95%**	Fresno	4943	15.94	74.1	9.95	88.73	8.48	0.08	0.04	0.49	2.18
6019007003	48.83	86.55	**85-90%**	Fresno	8061	15.54	72.48	11.97	81.35	12.58	0	0.14	4.73	1.2
6019007004	43.93	80.72	**80-85%**	Fresno	5813	14.5	71.55	13.95	70.57	20.56	0.5	0.33	5.9	2.15
6019007100	70.20	99.12	**95-100% (highest scores)**	Fresno	7637	20.48	70.41	9.11	90.1	7.52	0.81	0	1.17	0.41
6019007201	36.76	70.26	**70-75%**	Fresno	8196	15.79	69.84	14.37	39.49	52.5	0.22	0.04	3.15	4.6
6019007202	46.36	83.71	**80-85%**	Fresno	5144	12.52	72.51	14.97	59.27	31.36	0.39	0.82	3.65	4.51
6019007300	45.70	82.87	**80-85%**	Fresno	4325	15.51	71.33	13.16	54.73	30.2	3.98	0	10.29	0.81
6019007400	54.28	91.88	**90-95%**	Fresno	3407	18.2	71.73	10.07	71.12	27.88	0	0	0	1
6019007500	45.59	82.73	**80-85%**	Fresno	5068	10.87	73.36	15.77	65.51	25.43	0.16	0	6.04	2.86
6019007600	48.64	86.32	**85-90%**	Fresno	4273	11.96	75.26	12.78	70.33	24.57	1.68	0.23	2.34	0.84
6019007700	50.23	88.16	**85-90%**	Fresno	5221	15.95	70.02	14.02	70.52	27.54	0.31	0	0.04	1.59
6019007801	40.05	75.00	**75-80%**	Fresno	2731	15.71	73.67	10.62	97.95	1.24	0.77	0	0.04	0
6019007802	47.24	84.72	**80-85%**	Fresno	5354	24.32	70.3	5.38	89.8	6.31	0.32	3.25	0.32	0
6019007901	NA	NA	**NA**	Fresno	3251	0	99.88	0.12	66.87	20.61	2.03	1.29	4.31	4.89
6019007902	40.23	75.34	**75-80%**	Fresno	2952	17.11	71.75	11.14	75.41	15.35	3.96	2.51	0.82	1.96
6019008000	37.62	71.52	**70-75%**	Fresno	5360	12.41	75.3	12.29	51.27	44.76	1.62	0.13	1.66	0.56
6019008100	44.02	80.86	**80-85%**	Fresno	6532	17.24	74.8	7.96	56.8	29.19	3.87	4.23	3.91	2.01
6019008200	45.79	83.01	**80-85%**	Fresno	6768	18.01	73.45	8.54	94	5.29	0.71	0	0	0
6019008301	44.76	81.71	**80-85%**	Fresno	6009	22.33	72.64	5.03	94.16	5.51	0	0	0	0.33
6019008302	47.34	84.83	**80-85%**	Fresno	7406	15.95	77.63	6.43	93.25	1.66	4.21	0	0.74	0.14
6019008401	52.17	90.23	**90-95%**	Fresno	8857	15.65	75.62	8.73	90.75	9.21	0	0	0.03	0
6019008402	47.28	84.76	**80-85%**	Fresno	980	13.57	75.41	11.02	78.16	21.84	0	0	0	0
6019008501	57.16	94.01	**90-95%**	Fresno	4420	19.91	68.91	11.18	98.35	1.31	0	0	0.34	0
6019008502	56.51	93.57	**90-95%**	Fresno	9242	20.34	73.84	5.82	98.64	1.1	0	0	0.26	0
6021010100	27.94	54.84	**50-55%**	Glenn	8712	14.58	72.14	13.28	49.69	47.74	0	0.48	1.52	0.57
6021010200	21.75	41.64	**40-45%**	Glenn	5018	10.16	72.66	17.18	39.54	58.75	0	0.58	0.58	0.56
6021010300	30.40	59.48	**55-60%**	Glenn	1956	10.02	62.78	27.2	8.59	77.2	2.3	10.33	0.36	1.23
6021010400	42.59	78.78	**75-80%**	Glenn	7118	15.26	68.01	16.73	33.51	51.28	1.56	1.12	8.4	4.13
6021010501	24.88	48.49	**45-50%**	Glenn	3578	17.78	70.65	11.57	70.01	27.22	0.11	0	1.62	1.03
6021010502	15.15	25.87	**25-30%**	Glenn	1594	7.97	72.96	19.07	19.39	72.58	2.07	2.38	0.75	2.82
6023000100	38.44	72.87	**70-75%**	Humboldt	4242	14.29	73.76	11.95	15.7	64	4.95	4.83	6.95	3.56
6023000200	21.82	41.79	**40-45%**	Humboldt	5428	11.68	72.66	15.66	17.19	66.89	0.46	1.36	6.8	7.3
6023000300	18.62	34.29	**30-35%**	Humboldt	5788	12.68	72.6	14.72	9	67.09	0.02	0.79	16.67	6.43
6023000400	17.40	31.27	**30-35%**	Humboldt	4304	8.92	76.58	14.5	13.45	70.91	0.98	6.23	2.28	6.16
6023000500	27.43	53.82	**50-55%**	Humboldt	4450	8.72	71.82	19.46	16.7	65.96	6.7	3.53	2.11	5.01
6023000600	13.52	21.76	**20-25%**	Humboldt	4998	10.9	68.25	20.85	12.32	83.05	0.08	0.36	0.92	3.26
6023000700	8.04	8.60	**5-10%**	Humboldt	5316	8.65	65.5	25.85	4.78	89.11	0.56	0.38	1.2	3.97
6023000800	12.40	19.01	**15-20%**	Humboldt	5229	6.35	75.06	18.59	11.46	79.48	0.04	2.51	2.2	4.32
6023000900	10.33	13.77	**10-15%**	Humboldt	5229	6.85	69.19	23.96	7.42	84.82	0.15	1.17	1.8	4.65
6023001000	28.07	55.16	**55-60%**	Humboldt	6338	2.62	88.85	8.54	19.33	66.3	3.71	2.63	1.53	6.5
6023001101	27.00	52.98	**50-55%**	Humboldt	6841	6.86	80.59	12.56	14.52	69.13	1.42	0.72	10.26	3.96
6023001200	22.10	42.37	**40-45%**	Humboldt	4675	10.27	77.22	12.51	18.12	73.22	1.24	1.18	1.86	4.39
6023001300	31.21	61.06	**60-65%**	Humboldt	1320	4.92	79.92	15.15	5.15	79.7	0.68	1.67	2.58	10.23
6023010102	14.69	24.77	**20-25%**	Humboldt	2423	20.14	62.2	17.66	5.98	66.45	0.29	20.76	0	6.52
6023010200	10.99	15.44	**15-20%**	Humboldt	2775	11.71	65.19	23.1	6.31	84.9	0	3.96	0.76	4.07
6023010300	17.54	31.69	**30-35%**	Humboldt	3346	9.89	69.07	21.04	4.45	80.04	0.09	5.98	1.41	8.04
6023010400	10.27	13.65	**10-15%**	Humboldt	3659	11.45	73.44	15.11	4.62	88.6	0.3	2.02	1.23	3.22
6023010501	11.36	16.26	**15-20%**	Humboldt	7876	14.74	70.28	14.98	12.4	70.24	0.61	6.31	3.95	6.49
6023010502	15.16	25.91	**25-30%**	Humboldt	6308	14.74	69.91	15.35	5.09	81.21	0	4.52	1.93	7.24
6023010600	11.19	15.89	**15-20%**	Humboldt	1902	7.83	67.46	24.71	1.37	91.69	0	0.16	1.31	5.47
6023010700	21.27	40.47	**40-45%**	Humboldt	7741	13.32	69.05	17.63	14.42	68.82	0.43	0.49	6.03	9.82
6023010800	24.49	47.76	**45-50%**	Humboldt	4606	11.77	72.17	16.07	15.15	76.47	0.61	2.76	0.8	4.21
6023010901	27.63	54.14	**50-55%**	Humboldt	4655	16.15	63.37	20.47	26.87	65.33	0.79	1.22	1.46	4.32
6023010902	14.75	24.89	**20-25%**	Humboldt	4179	12.11	69.66	18.23	1.34	88.3	0	5.26	0.24	4.86
6023011000	19.65	36.64	**35-40%**	Humboldt	4687	11.37	69.51	19.12	18.5	76	0	1.98	0.79	2.73
6023011100	21.73	41.60	**40-45%**	Humboldt	4347	14.54	71.91	13.55	9.64	80.75	0.51	1.96	1.93	5.22
6023011200	13.63	22.05	**20-25%**	Humboldt	3309	9.46	65.19	25.36	11.42	83.26	0	1.3	1.69	2.33
6023011500	17.51	31.57	**30-35%**	Humboldt	3241	1.45	71.46	27.09	10.03	88.52	0.99	0	0.09	0.37

6023011600	16.46	28.96	**25-30%**	Humboldt	3465	8.31	73.36	18.33	6	89.78	2.25	0.12	0.29	1.56
6023940000	11.83	17.42	**15-20%**	Humboldt	3263	18.2	69.78	12.01	0.31	9.35	0.55	81.27	3.13	5.39
6025010101	NA	NA	**NA**	Imperial	4137	0	99.83	0.17	68.41	5.61	21.05	1.11	1.45	2.37
6025010102	44.74	81.69	**80-85%**	Imperial	4108	19.4	69.11	11.49	78.85	12	6.74	0	1.03	1.39
6025010200	50.99	88.84	**85-90%**	Imperial	2728	20.53	65.95	13.53	79.95	14.22	2.24	1.28	0.37	1.94
6025010300	39.91	74.84	**70-75%**	Imperial	1046	18.64	67.02	14.34	40.54	53.92	0	0.96	2.77	1.82
6025010400	53.21	91.05	**90-95%**	Imperial	7303	22.1	65.95	11.95	95.5	3.22	0.07	0	1.22	0
6025010500	49.07	86.83	**85-90%**	Imperial	7421	18.04	72.59	9.37	78.79	15.44	2.37	0.47	0.72	2.21
6025010600	47.78	85.21	**85-90%**	Imperial	6910	18.02	63.92	18.06	70.03	23.69	0.72	0.58	0.56	4.41
6025010700	45.10	82.17	**80-85%**	Imperial	4409	23.09	67.75	9.16	94.33	3.49	1.93	0	0	0.25
6025010800	30.32	59.33	**55-60%**	Imperial	1128	21.19	66.22	12.59	30.23	61.26	4.52	0	2.22	1.77
6025010900	35.16	67.83	**65-70%**	Imperial	7497	11.22	75.59	13.19	82.54	16.5	0.63	0	0	0.33
6025011000	40.51	75.88	**75-80%**	Imperial	14848	20.44	69.56	9.99	75.64	19.78	1.52	0.36	2.33	0.38
6025011100	43.58	80.19	**80-85%**	Imperial	4219	13.75	72.93	13.32	70.02	21.33	2.65	0.5	0.83	4.67
6025011201	31.76	61.99	**60-65%**	Imperial	6221	15.27	74.44	10.29	85.11	9.4	2.38	0.11	1.96	1.03
6025011202	44.72	81.66	**80-85%**	Imperial	5626	18.47	68.84	12.69	93.94	4.39	0.52	0.25	0.91	0
6025011300	50.80	88.64	**85-90%**	Imperial	11695	16.44	73.07	10.49	92.51	6.08	0.28	0	0.82	0.31
6025011400	54.85	92.41	**90-95%**	Imperial	4570	18.82	66.21	14.97	91.97	3.26	2.71	0	0	2.06
6025011500	48.30	85.88	**85-90%**	Imperial	6227	14.52	73.13	12.35	90.62	4.9	1.33	0.13	2.81	0.21
6025011600	37.66	71.58	**70-75%**	Imperial	5728	10.6	72.99	16.41	87.45	6.22	4.21	0.33	0.03	1.76
6025011700	41.64	77.55	**75-80%**	Imperial	5243	14.46	72.73	12.82	88.73	8.07	0.5	0	0.65	2.06
6025011801	21.37	40.77	**40-45%**	Imperial	4423	13.9	71.13	14.97	72.89	19.24	1.54	0.02	6.31	0
6025011802	34.49	66.67	**65-70%**	Imperial	5336	19.08	67.8	13.12	83.77	14.07	0	0	1.61	0.54
6025011803	25.34	49.51	**45-50%**	Imperial	6106	17.92	70.41	11.68	82.67	9.22	0	0	8.11	0
6025011900	46.90	84.29	**80-85%**	Imperial	11456	16.62	70.64	12.74	96.68	1.82	0.58	0.19	0.72	0
6025012001	44.65	81.56	**80-85%**	Imperial	3884	17.07	64.83	18.1	98.61	0.18	0.59	0	0	0.62
6025012002	41.58	77.42	**75-80%**	Imperial	10765	16.03	73.4	10.57	96.47	1.74	0	0	1.79	0
6025012100	60.51	96.03	**95-100% (highest scores)**	Imperial	6779	12.58	69.67	17.75	98.6	0.47	0.04	0	0.89	0
6025012200	58.38	94.70	**90-95%**	Imperial	7237	12.85	71.37	15.78	98.62	1.01	0	0	0.37	0
6025012301	19.46	36.06	**35-40%**	Imperial	4984	2.23	95.06	2.71	66.71	12.38	16.33	1.12	2.17	1.28
6025012302	22.87	44.15	**40-45%**	Imperial	6290	12.62	70.21	17.17	68.01	26.47	3.61	0	0.65	1.26
6025012400	25.77	50.52	**50-55%**	Imperial	713	0	23.56	76.44	7.29	88.5	0.84	1.26	2.1	0
6025940000	21.08	40.12	**40-45%**	Imperial	1664	13.52	67.25	19.23	33.05	15.14	1.86	43.75	0.72	5.47
6027000100	10.62	14.45	**10-15%**	Inyo	2754	12.53	61.98	25.49	33.22	61.33	0	2.25	1.34	1.85
6027000200	15.06	25.71	**25-30%**	Inyo	1878	7.14	71.99	20.87	18.48	71.73	1.6	3.99	1.65	2.56
6027000300	7.55	7.78	**5-10%**	Inyo	2541	9.72	63.01	27.27	11.18	86.62	0	2.2	0	0
6027000400	15.28	26.16	**25-30%**	Inyo	5466	14.76	66.28	18.95	22.76	50.4	0.75	18.99	3.91	3.18
6027000500	16.52	29.15	**25-30%**	Inyo	2284	11.16	65.76	23.07	14.62	58.89	0.83	19.35	1.14	5.17
6027000800	23.55	45.63	**45-50%**	Inyo	3054	10.48	65.06	24.46	29.34	60.12	1.67	5.08	1.67	2.13
6029000101	49.77	87.62	**85-90%**	Kern	12972	14.05	77.3	8.65	27.17	64.65	1.37	1.36	0.41	5.03
6029000102	46.63	83.99	**80-85%**	Kern	3349	11.17	75.63	13.2	12.15	86.03	0	0	0	1.82
6029000200	56.10	93.29	**90-95%**	Kern	7448	15.84	73.78	10.38	19.98	72.69	2.67	0.85	1.22	2.59
6029000300	44.09	81.00	**80-85%**	Kern	5322	20.33	70.46	9.21	29.16	59.24	0	0.09	1.3	10.2
6029000400	54.23	91.82	**90-95%**	Kern	4300	15.44	77.02	7.53	20.42	69.74	2.65	0.37	1.95	4.86
6029000503	8.13	8.81	**5-10%**	Kern	8331	16.22	73.34	10.44	23.39	70.87	1.34	0.61	3.23	0.55
6029000504	40.08	75.03	**75-80%**	Kern	4977	15.69	68.45	15.85	31.75	60.48	0.84	3.4	1.91	1.63
6029000505	18.67	34.46	**30-35%**	Kern	3806	12.82	66.71	20.47	18.65	73.96	0	0	3.76	3.63
6029000506	33.69	65.31	**65-70%**	Kern	2371	10.21	77.73	12.06	25.81	58.25	2.87	1.6	7.47	4.01
6029000507	45.72	82.89	**80-85%**	Kern	3736	12.39	70.77	16.84	32.87	65.2	0.11	0.67	0.83	0.32
6029000600	50.69	88.59	**85-90%**	Kern	7491	23.62	67.4	8.98	50.95	22.71	19.24	0.01	1.76	5.33
6029000700	30.39	59.46	**55-60%**	Kern	5562	14.44	74.97	10.59	51.26	46.58	0	0	0.31	1.85
6029000800	30.55	59.72	**55-60%**	Kern	5451	15.63	70.24	14.13	67.24	25.96	3.5	0	1.43	1.87
6029000902	30.95	60.51	**60-65%**	Kern	3411	14.45	72.18	13.37	68.72	24.89	3.64	0	2.49	0.26
6029000903	33.96	65.73	**65-70%**	Kern	4046	17.52	70.69	11.79	64.51	30.23	3.02	0.25	0.79	1.21
6029000904	38.81	73.25	**70-75%**	Kern	4667	14.68	70.26	15.06	59.01	34.18	1.26	0	4.09	1.46
6029000905	30.24	59.15	**55-60%**	Kern	2721	16.35	72.73	10.92	76.55	19.66	1.03	0	1.36	1.4
6029000906	31.39	61.30	**60-65%**	Kern	4518	13.3	78.24	8.46	73.31	22.38	1.95	0	1.68	0.69
6029000907	25.41	49.70	**45-50%**	Kern	2521	16.07	76.28	7.66	67.31	22.89	3.89	0.4	1.11	4.4

6029000908	25.78	50.53	50-55%	Kern	5104	15.36	74.63	10.01	48.47	43.51	5.94	0.59	0.16	1.33
6029000909	22.35	42.91	40-45%	Kern	2728	7.84	68.37	23.79	36.95	56.27	0.73	0.4	1.69	3.96
6029000910	25.21	49.23	45-50%	Kern	11403	17.2	67.21	15.59	44.84	42.8	2.9	0.61	6.02	2.84
6029001000	43.92	80.71	80-85%	Kern	10642	13.89	78.27	7.84	69.39	26.56	0.53	0	2.92	0.59
6029001101	40.71	76.16	75-80%	Kern	6282	20.25	73.13	6.62	85.96	11.88	1.67	0	0.3	0.19
6029001102	42.58	78.76	75-80%	Kern	6840	22.37	71.17	6.46	90.16	8.8	0	0.15	0.51	0.38
6029001103	41.90	77.85	75-80%	Kern	5400	23.54	72.78	3.69	88.41	4.39	2.93	0	2.04	2.24
6029001201	47.52	84.96	80-85%	Kern	2936	19.69	72.31	8	78.2	14.88	5.72	0	0.2	0.99
6029001202	48.95	86.66	85-90%	Kern	6049	23.74	71.32	4.94	77.83	10.86	10.27	0.51	0	0.53
6029001300	56.19	93.33	90-95%	Kern	7114	26.86	67.73	5.41	83.61	6.83	6.51	0	1.69	1.36
6029001400	46.37	83.74	80-85%	Kern	8000	21.68	65.11	13.21	75.9	9.98	8.39	0.86	3.11	1.76
6029001500	58.34	94.68	90-95%	Kern	2586	18.68	70.88	10.44	82.68	8.82	7.54	0	0.39	0.58
6029001600	59.50	95.40	95-100% (highest scores)	Kern	1967	16.47	72.14	11.39	46.72	25.47	20.34	0.86	2.95	3.66
6029001700	44.83	81.80	80-85%	Kern	3739	14.12	69.43	16.45	28.7	62.26	3.42	0	2.25	3.37
6029001801	40.27	75.44	75-80%	Kern	5614	10.81	75.81	13.38	39.13	42.71	9.08	0	5.52	3.54
6029001802	30.27	59.25	55-60%	Kern	5613	14.8	75.73	9.46	32.73	49.23	8.44	0	5.11	4.49
6029001901	45.59	82.72	80-85%	Kern	3697	13.09	74.95	11.96	48.39	41.03	8.63	0.27	1.21	0.46
6029001902	53.89	91.54	90-95%	Kern	4595	18	72.69	9.31	56.84	27.38	12.23	0	1.63	1.92
6029002000	68.07	98.64	95-100% (highest scores)	Kern	6941	24.69	63.68	11.63	56.56	5.96	32.6	0.19	3.73	0.95
6029002100	67.05	98.42	95-100% (highest scores)	Kern	3190	14.23	76.36	9.4	87.93	6.21	5.64	0	0.13	0.09
6029002200	71.91	99.36	95-100% (highest scores)	Kern	5633	24.11	69.63	6.27	78.8	1.79	16.81	0.89	1.48	0.23
6029002301	63.75	97.38	95-100% (highest scores)	Kern	10772	14.68	76.56	8.76	85.69	6.46	4.72	1.82	1.3	0.01
6029002302	51.95	89.98	85-90%	Kern	3803	23.09	68.89	8.02	98.4	1.21	0	0	0.39	0
6029002400	57.12	93.95	90-95%	Kern	8384	19.07	73.39	7.54	82.03	14.83	1.9	0.39	0.72	0.14
6029002500	73.36	99.53	95-100% (highest scores)	Kern	9052	20.48	71.88	7.63	75.35	6.64	15.49	0	0.99	1.52
6029002600	59.14	95.18	95-100% (highest scores)	Kern	3477	15.59	74.95	9.46	70.41	12.37	14.04	1.18	1.21	0.81
6029002700	53.18	91.01	90-95%	Kern	5903	14.94	74.74	10.32	67.9	18.3	11.25	0.42	2.13	0
6029002804	21.12	40.24	40-45%	Kern	2510	4.54	43.9	51.55	21.95	72.75	0.92	0	1.08	3.31
6029002806	16.01	27.85	25-30%	Kern	2112	8.24	82.1	9.66	22.35	54.02	9.04	0	11.17	3.41
6029002807	17.91	32.48	30-35%	Kern	3713	10.29	67.28	22.43	14.22	78.67	3.07	0	3.61	0.43
6029002808	13.27	21.18	20-25%	Kern	7110	12.25	71.69	16.06	29.4	48.61	4.11	1.05	13.32	3.52
6029002811	16.08	28.10	25-30%	Kern	3437	10.88	62.64	26.48	22.05	57.61	0	0	17.89	2.44
6029002812	44.56	81.47	80-85%	Kern	5021	18.98	74.31	6.71	54.49	27.52	10.66	0.96	1.25	5.12
6029002813	42.95	79.43	75-80%	Kern	4412	12.01	81.07	6.91	52.81	23.37	12.19	0	9.82	1.81
6029002814	40.87	76.37	75-80%	Kern	4038	18.67	68.08	13.25	47.92	32.81	12.7	0	5.45	1.11
6029002815	41.25	76.99	75-80%	Kern	4006	15.68	74.16	10.16	48.93	29.08	18.35	0	2.8	0.85
6029002816	35.91	69.00	65-70%	Kern	5837	16.14	76.19	7.68	60.84	24.67	5.79	0.17	2.69	5.84
6029002817	30.38	59.40	55-60%	Kern	5373	19.37	72.27	8.36	50.75	28.94	15.88	0.13	2.81	1.49
6029002818	21.40	40.89	40-45%	Kern	4050	12.05	74.72	13.23	37.83	51.75	6.67	0	2.05	1.7
6029002819	20.03	37.61	35-40%	Kern	4782	15.77	76.62	7.61	42.45	38.35	10.92	0	5.96	2.32
6029002820	19.36	35.87	35-40%	Kern	6506	14.53	76.19	9.28	41.35	33.66	8.73	0.55	12.77	2.94
6029002821	20.77	39.47	35-40%	Kern	4850	16.54	75.65	7.81	38.7	41.73	9.28	0.19	8.91	1.2
6029002900	48.79	86.51	85-90%	Kern	7424	20.99	70.23	8.78	66.54	22.04	6.96	0	3.73	0.73
6029003000	52.30	90.37	90-95%	Kern	7552	20.18	72.39	7.43	82.56	10.54	3.69	0	0.89	2.32
6029003103	52.83	90.76	90-95%	Kern	4084	15.48	73.26	11.26	82.57	16.14	0.49	0.49	0	0.32
6029003112	39.61	74.31	70-75%	Kern	5221	12.14	75.87	11.99	56.75	23.31	11.68	0.5	4.06	3.7
6029003113	47.68	85.12	85-90%	Kern	4993	20.01	68.38	11.62	58.96	19.65	15.08	0	5.37	0.94
6029003114	41.60	77.46	75-80%	Kern	7835	16.99	73.94	9.07	59.34	26.99	5.58	0	3.48	4.61
6029003115	50.03	87.91	85-90%	Kern	4816	16.03	75.81	8.16	70.49	17.59	6.04	0.19	3.36	2.33
6029003121	42.03	78.10	75-80%	Kern	8339	18.02	74.95	7.03	73.05	8.35	12.57	1.21	3.19	1.63
6029003122	40.83	76.34	75-80%	Kern	7970	20.72	71.82	7.47	82.99	7.62	7.79	0.24	0.56	0.8
6029003123	27.34	53.62	50-55%	Kern	18877	13.9	78.08	8.02	44.75	30.51	5.19	0.11	16.22	3.23
6029003124	27.01	53.00	50-55%	Kern	6123	11.06	78.9	10.04	49.45	28.63	7.41	0	12.73	1.76
6029003202	51.08	88.99	85-90%	Kern	18784	18.37	75.31	6.32	72.78	15.37	4.57	0.05	6.64	0.59
6029003203	11.83	17.41	15-20%	Kern	2260	8.98	76.99	14.03	24.69	67.04	0	0.84	4.96	2.48
6029003204	25.14	49.07	45-50%	Kern	11455	12.29	76.71	11	30	38.69	3.58	0.24	25.66	1.83
6029003205	35.39	68.18	65-70%	Kern	10285	15.03	77.43	7.54	66.37	13.51	4.49	0.19	10.78	4.66
6029003206	39.39	73.93	70-75%	Kern	21438	19.51	73.43	7.06	52.48	22.53	4.39	0.29	18.2	2.1

6029003303	41.19	76.92	75-80%	Kern	1521	16.96	68.97	14.07	45.3	50.23	0	1.51	0.59	2.37
6029003304	44.03	80.87	80-85%	Kern	3358	11.49	77.67	10.84	39.7	52.68	2.26	0.33	3.4	1.64
6029003305	11.24	16.01	15-20%	Kern	3487	6.17	76.34	17.49	20.88	73.24	0	0	1.55	4.33
6029003306	24.12	47.00	45-50%	Kern	4199	7.81	67.49	24.7	23.65	67.02	0	3.24	4.67	1.43
6029003400	42.63	78.88	75-80%	Kern	4762	18.77	72.74	8.48	61.78	34.31	0	0.36	1.93	1.62
6029003500	45.25	82.26	80-85%	Kern	8292	17.64	70.32	12.04	34.53	57.51	1.22	0	2.12	4.62
6029003600	38.24	72.50	70-75%	Kern	4194	17.02	72.99	9.99	38.75	59.28	0.55	0.57	0	0.86
6029003700	60.27	95.85	95-100% (highest scores)	Kern	3415	19.41	73.03	7.55	63.87	34.23	0.23	0	0	1.67
6029003803	13.85	22.62	20-25%	Kern	8602	18.59	75.31	6.1	22.62	66.95	0.76	2.6	4.56	2.51
6029003804	17.57	31.73	30-35%	Kern	16789	16.8	76.84	6.36	35.19	52.02	3.12	0	6.24	3.44
6029003805	9.50	11.70	10-15%	Kern	9244	16.24	75.37	8.39	30.53	56.33	4.66	0	5.99	2.49
6029003806	11.72	17.16	15-20%	Kern	5167	12.1	75.01	12.89	27.48	53.69	3.46	0.29	13.2	1.88
6029003807	12.88	20.15	20-25%	Kern	3745	16.07	69.16	14.77	16.56	80.88	0.27	0.51	0.27	1.52
6029003808	15.47	26.55	25-30%	Kern	4495	16.28	74.93	8.79	31.28	47.88	5.09	0	8.16	7.59
6029003809	16.52	29.14	25-30%	Kern	12184	13.71	73.48	12.8	24.62	61.52	2.02	1.62	7.57	2.64
6029003810	8.47	9.58	5-10%	Kern	2811	14.02	70.19	15.8	19.82	71.01	2.77	0	5.34	1.07
6029003811	18.67	34.44	30-35%	Kern	2723	13.51	72.97	13.51	24.09	66.91	1.21	2.68	3.26	1.84
6029003812	16.70	29.60	25-30%	Kern	4405	12.37	70.44	17.19	28.04	59.18	0.93	0	10.03	1.82
6029003813	12.90	20.23	20-25%	Kern	8070	13.22	73.62	13.16	28.33	53.79	2.23	2.08	11.2	2.37
6029003900	48.98	86.69	85-90%	Kern	1963	7.44	87.98	4.58	56.09	31.58	8.86	1.07	0.05	2.34
6029004000	36.17	69.45	65-70%	Kern	9516	15.25	79.02	5.73	83.2	11.22	3.91	0.06	1.02	0.59
6029004101	46.10	83.40	80-85%	Kern	5476	16.78	70.69	12.53	72.57	26.04	0.11	0.47	0.22	0.58
6029004102	52.28	90.33	90-95%	Kern	5253	20.54	72.21	7.25	96.54	3.46	0	0	0	0
6029004200	46.10	83.37	80-85%	Kern	1448	18.51	74.59	6.91	69.41	27.49	1.93	0	0.55	0.62
6029004301	53.53	91.34	90-95%	Kern	8948	19.3	75.04	5.65	88.21	10.13	0.57	0	1.1	0
6029004302	NA	NA	NA	Kern	5571	0	99.53	0.47	54.69	16.77	21.25	0.88	1.69	4.72
6029004401	43.54	80.17	80-85%	Kern	8342	16.26	71.6	12.14	87.04	8.3	3.07	0	0	1.59
6029004402	68.74	98.83	95-100% (highest scores)	Kern	4436	22.9	70.22	6.88	94.07	2.28	2.75	0.86	0.02	0.02
6029004500	48.62	86.27	85-90%	Kern	2635	18.79	78.22	3	92.83	6.3	0	0.19	0.68	0
6029004601	NA	NA	NA	Kern	3267	0	98.5	1.5	50.51	15.18	24.67	1.16	3.36	5.11
6029004603	NA	NA	NA	Kern	2231	0	99.91	0.09	59.08	11.39	22.55	0.85	1.84	4.3
6029004604	55.31	92.76	90-95%	Kern	14840	13.81	78.89	7.3	71.64	7.38	3.03	0.3	16.87	0.78
6029004701	48.33	85.96	85-90%	Kern	11517	17.67	79.66	2.67	94.03	3.55	1.33	0.08	0.13	0.88
6029004702	48.05	85.53	85-90%	Kern	3761	20.26	70.06	9.68	96.81	3.06	0	0	0.13	0
6029004800	58.48	94.76	90-95%	Kern	9530	22.81	69.03	8.15	94.97	1.82	0.22	0.86	2.09	0.04
6029004901	50.22	88.11	85-90%	Kern	5863	18.25	71.47	10.28	79.57	3.85	0.1	0	16.15	0.32
6029004902	29.40	57.61	55-60%	Kern	8674	12.44	75.21	12.35	73.29	3.23	0.12	0.58	22.55	0.24
6029005003	45.74	82.92	80-85%	Kern	3797	16.72	74.4	8.88	85.46	3.24	2.13	0	9.03	0.13
6029005004	43.59	80.23	80-85%	Kern	7061	13.55	75.97	10.48	80.87	7.36	1.66	0.18	9.54	0.38
6029005103	42.31	78.47	75-80%	Kern	2437	4.19	67.91	27.9	9.64	86.05	0.41	0	0.86	3.04
6029005104	17.03	30.55	30-35%	Kern	4220	12.23	57.58	30.19	14.86	73.25	1.37	0.38	6.42	3.72
6029005201	29.10	57.05	55-60%	Kern	4522	4.56	57.72	37.73	11.32	86.73	0.15	0.35	0.82	0.62
6029005203	20.46	38.59	35-40%	Kern	4942	10.81	59.25	29.95	3.12	89.94	1.19	2.55	0.08	3.12
6029005204	43.38	80.01	80-85%	Kern	5963	6.32	70.27	23.41	13.57	80.73	0.29	2.08	1.01	2.33
6029005300	35.77	68.80	65-70%	Kern	1993	17.01	81.59	1.4	22.38	62.67	6.12	0	4.31	4.52
6029005401	24.75	48.22	45-50%	Kern	6255	11.69	68.94	19.38	23.8	60.72	0.7	1.26	11.91	1.6
6029005402	21.12	40.22	40-45%	Kern	5027	12.37	70.36	17.27	17.15	65.47	9.37	0	5.67	2.35
6029005403	16.00	27.84	25-30%	Kern	9119	16.24	71.37	12.39	21.92	65.35	3.27	2.12	3.62	3.73
6029005404	18.17	33.12	30-35%	Kern	6819	10.24	76.1	13.67	17.76	70.86	3.5	3.17	2.29	2.42
6029005501	33.81	65.53	65-70%	Kern	6015	12.88	64.77	22.34	14.4	68.45	12.4	0	2.24	2.51
6029005506	28.76	56.45	55-60%	Kern	5964	16.7	69.68	13.62	34.57	52.33	3.37	1.07	1.14	7.51
6029005507	24.23	47.24	45-50%	Kern	7067	14.38	71.19	14.43	27.93	43.88	19.06	0.65	3.76	4.71
6029005508	24.72	48.17	45-50%	Kern	4414	19.55	67.24	13.21	24.54	38.7	30.18	0.27	1.13	5.19
6029005600	32.75	63.64	60-65%	Kern	2221	7.97	75.69	16.34	24.13	58.94	2.97	0.63	5.36	7.97
6029005700	26.73	52.46	50-55%	Kern	2827	33.99	66.01	0	15.28	65.79	5.7	0	4.14	9.09
6029005801	17.40	31.29	30-35%	Kern	6604	13.75	76.85	9.4	29.83	53.51	8.95	0.32	2.54	4.85
6029005802	37.90	71.94	70-75%	Kern	9479	17.42	74.97	7.62	54.57	31.51	9.08	0.2	0.81	3.82
6029005900	42.48	78.63	75-80%	Kern	3394	15.26	68.74	16	40.48	26.84	25.01	3.33	2.33	2

6029006002	NA	NA	NA	Kern	4228	0	98.2	1.8	48.77	29.02	15.18	0.8	2.81	3.41
6029006003	18.28	33.43	30-35%	Kern	6018	19.09	69.11	11.8	21.2	76.52	0	0	0	2.28
6029006004	29.48	57.75	55-60%	Kern	1225	4.57	63.92	31.51	23.51	69.47	0.08	0	1.63	5.31
6029006006	13.69	22.20	20-25%	Kern	3878	14.36	66.3	19.34	14	82.08	0.77	0	1.81	1.34
6029006007	31.66	61.72	60-65%	Kern	6245	15.71	65.62	18.67	17.68	76.06	0.29	1.86	0.46	3.65
6029006008	16.77	29.88	25-30%	Kern	6011	10.41	59.46	30.13	11.18	82.78	1.1	0	2.1	2.84
6029006100	35.86	68.92	65-70%	Kern	8240	15.11	67.77	17.12	28.73	57.54	7.33	0.52	2.4	3.48
6029006201	63.93	97.47	95-100% (highest scores)	Kern	2923	18.2	71.5	10.3	75.88	21.9	0	0	0.31	1.92
6029006202	42.73	79.05	75-80%	Kern	8427	22.13	73.06	4.81	92.92	4.5	0.98	0	1.6	0
6029006301	40.12	75.16	75-80%	Kern	4074	15.41	74.45	10.14	91.26	6.6	0.12	0.98	0.59	0.44
6029006303	39.00	73.46	70-75%	Kern	5922	20.01	75.8	4.19	93.3	6.59	0	0.12	0	0
6029006304	49.17	86.96	85-90%	Kern	4395	27.24	67.78	4.98	97.63	1.84	0.14	0	0.11	0.27
6029006401	51.11	89.02	85-90%	Kern	7230	15.01	80.14	4.85	96.63	2.31	0	0	0.95	0.11
6029006403	39.42	74.02	70-75%	Kern	6603	20.63	75.8	3.57	92.22	7.63	0	0	0	0.15
6029006404	35.09	67.74	65-70%	Kern	3170	22.37	69.43	8.2	93.44	6.56	0	0	0	0
6029006500	41.24	76.98	75-80%	Kern	4501	4.44	83.56	12	43.86	32.35	15.06	0.2	5.13	3.4
6031000100	40.07	75.01	75-80%	Kings	3053	13.36	72.98	13.66	36.23	55.94	0.16	0.1	5.7	1.87
6031000200	50.56	88.45	85-90%	Kings	2287	12.68	71.58	15.74	41.71	54.61	2.58	0.17	0.92	0
6031000300	40.69	76.11	75-80%	Kings	6858	22.43	77.14	0.44	23.34	49.99	15.88	0.5	4.89	5.41
6031000402	32.66	63.55	60-65%	Kings	5976	12.67	74.25	13.09	38.65	46.82	3.87	0	7.76	2.89
6031000403	26.14	51.19	50-55%	Kings	5007	15.6	73.04	11.36	37.63	40.82	9.79	0.18	5.69	5.89
6031000404	30.92	60.49	60-65%	Kings	10622	15.17	77.56	7.28	38.09	46.33	2.98	0	8.27	4.32
6031000405	39.83	74.71	70-75%	Kings	6796	21.09	68.64	10.27	54.91	31.36	4.24	0.74	6.44	2.31
6031000500	48.37	86.01	85-90%	Kings	5358	12.26	75.51	12.22	62.84	24.92	5.8	0.43	3.51	2.5
6031000601	26.17	51.26	50-55%	Kings	9844	17.77	72.78	9.46	36.18	47.16	4.36	0	8.15	4.15
6031000602	22.29	42.74	40-45%	Kings	5962	9.73	72.07	18.2	26.5	58.2	6.07	0	4.88	4.34
6031000701	24.59	47.95	45-50%	Kings	5656	10.59	72.63	16.78	37.11	52.74	2.12	0.62	2.65	4.76
6031000702	37.46	71.33	70-75%	Kings	4342	13.45	70.89	15.66	42.7	37.45	12.16	0	2.74	4.95
6031000800	52.55	90.56	90-95%	Kings	5055	20.55	68.01	11.43	54.6	35.53	4.27	1.21	1.9	2.49
6031000900	53.02	90.86	90-95%	Kings	7956	14.53	76.77	8.7	59.29	31.23	6.15	1.37	0.58	1.38
6031001001	33.60	65.19	65-70%	Kings	4519	13.96	66.87	19.16	27.71	56.23	4.09	0	7.26	4.71
6031001002	52.52	90.53	90-95%	Kings	5094	16.16	75.44	8.4	76.34	14.45	3.47	0	3.26	2.47
6031001003	45.39	82.39	80-85%	Kings	6811	17.87	73.95	8.18	70.46	15.46	2.61	2.44	7.52	1.51
6031001100	69.60	99.00	95-100% (highest scores)	Kings	6631	19.45	68.75	11.79	80.58	9.8	3.92	0.17	3.68	1.85
6031001200	51.83	89.81	85-90%	Kings	2445	13.91	73.87	12.23	48.14	48.71	0.41	0.7	0.82	1.23
6031001300	48.34	85.97	85-90%	Kings	4811	24.69	62.56	12.74	80.88	11.6	4.26	0	0	3.26
6031001401	34.15	66.15	65-70%	Kings	2646	14.29	75.93	9.79	89.87	8.16	1.97	0	0	0
6031001402	44.47	81.39	80-85%	Kings	2168	19.7	65.82	14.48	80.86	17.44	0.65	0.65	0	0.42
6031001500	34.69	67.07	65-70%	Kings	4671	12.1	74.57	13.34	80.15	15.54	3.96	0	0.34	0
6031001601	53.97	91.62	90-95%	Kings	4101	16.95	75.69	7.36	64.96	16.65	1.95	13.39	0.83	2.22
6031001602	NA	NA	NA	Kings	9035	0	98.53	1.47	50.01	21.2	23.03	1.58	1.82	2.36
6031001701	41.52	77.37	75-80%	Kings	10015	23.03	70.31	6.66	93.69	6.08	0.23	0	0	0
6031981800	NA	NA	NA	Kings	2972	0	99.29	0.71	58.98	22.38	13.29	1.82	1.11	2.42
6033000100	19.00	35.16	35-40%	Lake	3376	10.9	59.03	30.07	11.73	72.72	2.34	7.05	3.23	2.93
6033000300	25.87	50.73	50-55%	Lake	4307	11.03	63.52	25.45	21.69	71.74	0.39	3.34	1.21	1.63
6033000400	19.87	37.18	35-40%	Lake	5646	7.28	64.93	27.79	16.21	71.45	0.44	4.22	5.12	2.57
6033000501	17.01	30.48	30-35%	Lake	3047	9.98	76.17	13.85	26.98	64.42	3.54	2.99	0	2.07
6033000502	15.47	26.56	25-30%	Lake	2446	10.18	71.22	18.6	11.32	79.76	1.59	0	0.16	7.15
6033000600	20.00	37.52	35-40%	Lake	3955	13.27	59.95	26.78	7.41	83.36	0.33	1.06	1.74	6.09
6033000701	22.94	44.31	40-45%	Lake	4171	8.32	66.65	25.03	17.69	68.62	7.17	4.39	0	2.13
6033000702	22.71	43.80	40-45%	Lake	4107	24.3	61.07	14.63	37.74	54.54	0	4.72	0.19	2.8
6033000801	38.38	72.79	70-75%	Lake	2703	12.54	68.96	18.5	23.38	60.01	4.62	3.11	0.3	8.58
6033000802	35.15	67.78	65-70%	Lake	4617	14.94	71.06	13.99	32.42	54.93	4.38	5.02	0.24	3.01
6033000900	13.26	21.10	20-25%	Lake	6608	9.34	65.89	24.77	18.9	73.47	5.1	0.48	0.32	1.73
6033001000	27.05	53.15	50-55%	Lake	6076	13.3	65.21	21.49	29.59	63.08	1.17	5.89	0.18	0.08
6033001100	10.78	14.94	10-15%	Lake	2849	5.97	70.48	23.55	3.02	94.52	0.56	0	0.28	1.61
6033001200	17.51	31.54	30-35%	Lake	3179	12.17	59.3	28.53	25.83	68.32	0	2.04	2.61	1.2
6033001300	15.72	27.16	25-30%	Lake	7108	10.76	69.47	19.77	17.11	79.56	0	0.35	0.74	2.24

6035040100	12.56	19.29	**15-20%**	Lassen	1445	8.72	67.27	24.01	7.27	88.1	1.38	0.76	1.52	0.97
6035040200	17.62	31.88	**30-35%**	Lassen	2587	8.66	66.95	24.39	4.91	87.79	2.55	2.98	0	1.78
6035040302	13.23	20.99	**20-25%**	Lassen	4056	13.61	67.5	18.89	8.28	88.07	0	1.33	0.67	1.65
6035040303	26.38	51.59	**50-55%**	Lassen	2400	12.54	69.88	17.58	14.42	76.79	1.08	0.17	4.3	3.25
6035040304	30.58	59.80	**55-60%**	Lassen	1600	10.19	72.25	17.56	3.94	75.06	4.94	4.13	10.19	1.75
6035040305	10.78	14.93	**10-15%**	Lassen	3001	17.43	70.41	12.16	5.7	72.58	3.43	9.96	3.37	4.97
6035040400	NA	NA	**NA**	Lassen	9280	0.85	94.7	4.45	43.15	31.24	21.12	1.49	2.08	0.93
6035040500	6.62	5.95	**5-10%**	Lassen	3240	12.56	63.18	24.26	3.61	88.52	0.06	2.44	1.14	4.23
6035040600	20.57	38.99	**35-40%**	Lassen	3209	5.77	82.77	11.47	17.92	64.16	11.09	3.61	0.87	2.34
6037101110	23.81	46.28	**45-50%**	Los Angeles	4283	12.65	70.37	16.97	27.74	61.08	0.44	0.07	7.8	2.87
6037101122	13.17	20.84	**20-25%**	Los Angeles	3405	5.37	74.65	19.97	4.32	84.64	2.17	0.44	6.46	1.97
6037101210	26.11	51.13	**50-55%**	Los Angeles	6347	14.16	76	9.83	41.22	47.05	3.12	0	7.66	0.96
6037101220	30.64	59.95	**55-60%**	Los Angeles	3702	8.1	75.8	16.1	36.84	48.95	2.35	0	9.21	2.65
6037101300	19.86	37.15	**35-40%**	Los Angeles	3884	7.8	68	24.2	7.65	80.48	5.28	0	4.99	1.6
6037101400	27.07	53.18	**50-55%**	Los Angeles	3458	7.84	73.08	19.09	17.09	65.67	0.26	0.38	11.83	4.77
6037102103	33.59	65.17	**65-70%**	Los Angeles	1763	7.77	77.14	15.09	20.14	62.73	1.42	0	12.71	3.01
6037102104	31.91	62.25	**60-65%**	Los Angeles	3721	9.03	71.22	19.75	13.76	69.01	1.96	0	9.64	5.62
6037102105	47.82	85.27	**85-90%**	Los Angeles	1905	5.14	84.62	10.24	67.35	22.41	0.73	1.26	6.72	1.52
6037102107	34.95	67.46	**65-70%**	Los Angeles	4349	6.28	77.54	16.19	27.48	59.9	1.59	0.14	9.15	1.75
6037103101	19.63	36.56	**35-40%**	Los Angeles	2428	12.89	71.95	15.16	16.31	73.85	0.74	0	6.75	2.35
6037103102	25.80	50.58	**50-55%**	Los Angeles	4734	6.84	75.98	17.17	27.93	56	0	0	12.23	3.84
6037103200	30.65	59.97	**55-60%**	Los Angeles	6349	9.67	67.3	23.03	27.58	60.88	1.65	0	6.88	3.01
6037103300	19.52	36.26	**35-40%**	Los Angeles	3781	9.92	71.04	19.04	10.66	76.62	0.03	1.19	7.17	4.34
6037103400	21.30	40.54	**40-45%**	Los Angeles	6416	8.54	72.43	19.03	24.52	54.11	2.4	0	16.16	2.81
6037104103	35.39	68.17	**65-70%**	Los Angeles	3431	10.03	77.18	12.8	69.98	11.05	12.56	0	5.8	0.61
6037104105	40.12	75.15	**75-80%**	Los Angeles	6054	11.12	79.48	9.4	74.03	5.7	4.59	0.51	11.31	3.85
6037104108	38.77	73.17	**70-75%**	Los Angeles	6001	14.81	75.34	9.85	83.02	5.45	7.17	0	3.6	0.77
6037104124	29.79	58.28	**55-60%**	Los Angeles	3875	13.03	72.8	14.17	44.59	31.59	12.67	0.57	8.34	2.25
6037104201	47.25	84.73	**80-85%**	Los Angeles	4569	13.9	75.38	10.72	89.32	1.23	8.78	0.68	0	0
6037104203	42.74	79.07	**75-80%**	Los Angeles	5441	14.1	78.51	7.39	88.53	1.51	8.2	0	1.25	0.51
6037104204	42.91	79.34	**75-80%**	Los Angeles	3679	8.94	80.43	10.63	78.01	9.76	3.78	0	6.69	1.77
6037104310	56.86	93.84	**90-95%**	Los Angeles	4962	18.46	72.61	8.93	95.61	1.37	1.93	0.16	0.36	0.56
6037104320	57.53	94.23	**90-95%**	Los Angeles	5292	12.15	75.6	12.24	89.15	2.63	4.61	0.04	1.1	2.48
6037104401	63.26	97.20	**95-100% (highest scores)**	Los Angeles	3270	16.02	72.51	11.47	96.48	1.99	0.43	0	1.1	0
6037104403	58.90	95.06	**95-100% (highest scores)**	Los Angeles	3341	11.4	75.46	13.14	95.51	0.45	0	0	4.04	0
6037104404	58.41	94.72	**90-95%**	Los Angeles	3084	17.32	74.29	8.4	92.96	2.59	2.01	0	2.17	0.26
6037104500	54.89	92.47	**90-95%**	Los Angeles	3025	12.66	75.34	12	98.88	0.83	0.03	0.13	0	0.13
6037104610	50.25	88.19	**85-90%**	Los Angeles	3386	15.45	74.81	9.75	97.19	1.95	0	0.41	0	0.44
6037104620	49.19	87.00	**85-90%**	Los Angeles	3528	13.55	76.47	9.98	98.24	1.76	0	0	0	0
6037104701	58.77	94.96	**90-95%**	Los Angeles	4402	16.7	76.47	6.84	94.46	1.32	3.29	0	0.93	0
6037104703	74.98	99.66	**95-100% (highest scores)**	Los Angeles	2174	20.75	73.14	6.12	85.37	5.98	7.96	0.69	0	0
6037104704	50.52	88.43	**85-90%**	Los Angeles	4321	19.02	71.44	9.53	78.15	6.36	12.84	0	2.06	0.58
6037104810	58.69	94.89	**90-95%**	Los Angeles	5631	12.93	77.07	10	95.21	3.34	0.21	0.41	0.83	0
6037104821	50.47	88.36	**85-90%**	Los Angeles	3551	11.26	80.57	8.17	89.27	4.65	2.42	0	3.35	0.31
6037104822	58.96	95.08	**95-100% (highest scores)**	Los Angeles	2839	16.1	75.31	8.59	90.63	2.4	1.23	0	5	0.74
6037106010	23.96	46.71	**45-50%**	Los Angeles	3093	10.31	73.78	15.91	72	17.78	4.01	0	3.82	2.39
6037106020	27.52	53.98	**50-55%**	Los Angeles	5420	7.95	77.51	14.54	77.25	19.48	1	0	1.31	0.96
6037106111	18.09	32.96	**30-35%**	Los Angeles	4191	11.45	73.82	14.72	56.74	27.11	4.41	0.52	10.07	1.15
6037106112	33.89	65.66	**65-70%**	Los Angeles	5611	11.82	75.87	12.32	69.42	18.36	2.82	0	8.04	1.37
6037106113	36.09	69.30	**65-70%**	Los Angeles	3697	9.66	75.74	14.61	71.68	15.44	3.79	0.73	8.36	0
6037106114	39.41	73.99	**70-75%**	Los Angeles	6324	18.15	73.94	7.91	88.28	3.59	3.29	0	4.51	0.33
6037106403	26.23	51.36	**50-55%**	Los Angeles	3667	11.84	76.3	11.86	90.48	7.64	1.69	0	0.19	0
6037106405	35.41	68.19	**65-70%**	Los Angeles	4758	16.69	73.64	9.67	74.4	16.98	6.47	0	1.37	0.78
6037106406	34.12	66.07	**65-70%**	Los Angeles	5839	13.29	71.23	15.48	68.74	21.2	1.03	0	7.16	1.87
6037106407	41.58	77.43	**75-80%**	Los Angeles	3119	15.68	70.82	13.5	66.46	12.44	15.77	0	4.26	1.06
6037106408	30.40	59.49	**55-60%**	Los Angeles	3667	18.68	76.63	4.69	89.86	4.06	2.51	0	3.25	0.33
6037106510	38.87	73.29	**70-75%**	Los Angeles	5618	13.51	75.26	11.23	72.57	13.85	4.79	0	7.8	1
6037106520	49.93	87.77	**85-90%**	Los Angeles	5920	16	70.86	13.14	88.92	8.48	0.27	0	2.13	0.2

6037106603	17.01	30.50	30-35%	Los Angeles	3156	9.03	67.78	23.19	17.36	52.69	2.22	0	24.33	3.39
6037106604	56.56	93.68	90-95%	Los Angeles	5068	14.5	68.07	17.42	91.22	4.93	1.09	0	2.15	0.61
6037106641	19.58	36.42	35-40%	Los Angeles	2372	11.72	67.54	20.74	8.39	66.86	0.25	0	19.18	5.31
6037106642	26.81	52.66	50-55%	Los Angeles	2961	11.38	66.8	21.82	23.4	53.16	5.74	0	11.42	6.28
6037106643	19.53	36.28	35-40%	Los Angeles	4577	9.92	69.7	20.38	13.5	61.09	1.79	0.44	21.37	1.81
6037106645	20.77	39.46	35-40%	Los Angeles	3650	10.47	68.14	21.4	17.1	61.51	1.53	0.38	18.05	1.42
6037106646	29.62	58.03	55-60%	Los Angeles	3161	9.24	68.68	22.08	28.44	44.32	4.97	0.13	18.7	3.45
6037106648	40.46	75.79	75-80%	Los Angeles	4546	13.48	77.19	9.33	96.66	2.82	0.26	0	0.13	0.13
6037106649	36.34	69.65	65-70%	Los Angeles	2661	13.9	72.9	13.19	66.37	8.31	2.63	0.26	19.02	3.42
6037107010	36.30	69.58	65-70%	Los Angeles	3141	11.24	80.29	8.47	95.42	2.8	0.45	0.25	0.64	0.45
6037107020	29.54	57.92	55-60%	Los Angeles	5317	17.53	75.34	7.13	87.42	4.08	0.34	0	7.86	0.3
6037108101	22.01	42.17	40-45%	Los Angeles	2327	9.28	64.29	26.43	13.88	57.07	3.57	0	22.05	3.44
6037108102	20.66	39.23	35-40%	Los Angeles	3552	8.36	67.37	24.27	9.07	54.39	3.66	0	31.22	1.66
6037108103	17.48	31.48	30-35%	Los Angeles	3099	8.87	65.57	25.56	11.49	57.73	0	0.32	27.24	3.23
6037108104	9.07	10.73	10-15%	Los Angeles	1836	11.6	69.93	18.46	7.41	50.65	5.23	0	35.08	1.63
6037108201	13.95	22.84	20-25%	Los Angeles	5460	9.49	71.94	18.57	5.6	36.65	6.54	0	46.59	4.62
6037108202	22.62	43.55	40-45%	Los Angeles	7487	14.57	64.35	21.08	6.75	33.15	7.85	0.45	47.63	4.17
6037109100	41.97	77.99	75-80%	Los Angeles	2797	11.66	63.21	25.13	63.32	24.35	0.29	0.25	11.8	0
6037109200	22.72	43.84	40-45%	Los Angeles	2846	13.25	76.77	9.98	38.02	34.05	1.26	0	25.05	1.62
6037109300	30.34	59.34	55-60%	Los Angeles	2962	8.17	74.98	16.85	43.79	35.58	0.88	0	16.98	2.77
6037109400	34.97	67.51	65-70%	Los Angeles	3903	7.58	78.58	13.84	74.25	13.81	0.85	0	9.73	1.36
6037109500	63.15	97.15	95-100% (highest scores)	Los Angeles	4832	15.09	71.75	13.16	92.76	3.6	1.35	0	2.3	0
6037109601	30.68	60.06	60-65%	Los Angeles	4945	10.17	76.14	13.69	69.83	15.85	1.01	0	10.62	2.69
6037109603	36.83	70.34	70-75%	Los Angeles	4297	10.29	75.03	14.68	70.79	11.64	0.93	0	14.48	2.16
6037109604	33.69	65.27	65-70%	Los Angeles	3195	11.83	77.21	10.95	68.79	16.62	0.85	0.88	11.92	0.94
6037109700	22.54	43.37	40-45%	Los Angeles	4616	10.57	75.41	14.02	42.22	31.72	10.12	0	14.69	1.26
6037109800	26.31	51.46	50-55%	Los Angeles	5534	17.06	66.93	16.01	57.99	24.41	2.37	0	14.06	1.17
6037111100	31.49	61.49	60-65%	Los Angeles	3179	9.22	76.88	13.9	49.73	31.02	2.67	0.16	14.38	2.04
6037111201	27.95	54.85	50-55%	Los Angeles	3628	9.48	73.37	17.14	33.1	49.81	1.1	0	15.49	0.5
6037111202	25.59	50.08	50-55%	Los Angeles	5169	9.52	75.64	14.84	30.45	51.25	1.97	0.17	14.3	1.86
6037111204	17.81	32.26	30-35%	Los Angeles	6114	7.85	68.11	24.04	17.39	51.68	3.39	0.16	23.67	3.71
6037111205	29.25	57.36	55-60%	Los Angeles	3869	11.61	71.57	16.83	25.02	27.66	6.8	0	37.22	3.31
6037111206	18.98	35.11	35-40%	Los Angeles	4379	7.4	71.98	20.62	29.34	48.87	1.1	0.32	15.44	4.93
6037111301	27.15	53.35	50-55%	Los Angeles	7552	11.32	75.54	13.14	29.66	32.68	5.87	0	27.66	4.13
6037111302	35.54	68.47	65-70%	Los Angeles	5163	6.35	75.23	18.42	23.94	41.55	9.24	0	24.06	1.22
6037111400	25.06	48.83	45-50%	Los Angeles	8735	7.64	76.07	16.29	42.63	38.65	4.46	0	14.05	0.21
6037113101	25.24	49.33	45-50%	Los Angeles	3719	6.8	70.18	23.02	22.96	55.98	3.6	0	17.45	0
6037113102	25.05	48.81	45-50%	Los Angeles	3021	4.97	71.8	23.24	15.62	70.61	2.09	0	10.99	0.7
6037113211	19.73	36.84	35-40%	Los Angeles	4109	10.46	62.64	26.89	7.86	74.69	2.58	0	13.85	1.02
6037113212	22.99	44.48	40-45%	Los Angeles	3494	10.1	71.55	18.35	29.62	37.38	3.75	0.23	25.93	3.09
6037113213	23.45	45.49	45-50%	Los Angeles	5248	9.79	75.27	14.94	29.19	33.57	5.93	1.05	21.25	9.01
6037113231	22.95	44.35	40-45%	Los Angeles	2303	11.94	67.69	20.36	12.72	62.92	2.61	0	10.99	10.77
6037113232	22.66	43.61	40-45%	Los Angeles	4315	11.87	64.08	24.06	15.37	60.83	2.97	0	16.04	4.8
6037113233	44.83	81.78	80-85%	Los Angeles	7345	9.93	79.48	10.59	58.53	19.13	6.56	0	14.36	1.42
6037113234	36.90	70.42	70-75%	Los Angeles	4823	16.86	68.32	14.82	44.89	30.79	4.33	0	17.93	2.05
6037113235	14.98	25.54	25-30%	Los Angeles	1824	13.05	72.86	14.09	21.44	53.84	6.36	2.14	3.45	12.77
6037113237	36.79	70.30	70-75%	Los Angeles	4194	10.75	67.22	22.03	25.89	41.87	15.4	0	11.4	5.44
6037113301	31.70	61.83	60-65%	Los Angeles	3509	11.77	66.77	21.46	18.67	54.94	5.7	0.06	18.35	2.28
6037113303	32.46	63.24	60-65%	Los Angeles	4191	10.02	69.36	20.62	26.91	58.08	1.57	0.38	10.95	2.1
6037113321	39.71	74.55	70-75%	Los Angeles	6180	7.1	84.68	8.22	32.38	39.27	8.74	0	15.71	3.9
6037113322	20.30	38.25	35-40%	Los Angeles	4572	11.2	68.22	20.58	31.78	44.01	1.84	0	19.36	3.02
6037113401	42.00	78.04	75-80%	Los Angeles	6550	9.6	74.43	15.97	48.26	27.47	2.02	0	15.67	6.6
6037113421	43.07	79.61	75-80%	Los Angeles	6879	11.03	79.21	9.75	57.93	20.15	5.79	0	14.54	1.6
6037113422	38.58	73.00	70-75%	Los Angeles	6306	12.29	73.47	14.24	42.37	34.59	4.65	0.49	14.67	3.24
6037115101	25.95	50.90	50-55%	Los Angeles	5083	9.72	68.13	22.15	26.58	54.2	5.13	0	11.43	2.66
6037115103	NA	NA	NA	Los Angeles	3381	0	99.88	0.12	36.76	25.91	13.81	0	18.69	4.82
6037115104	43.12	79.66	75-80%	Los Angeles	4377	4.62	84.37	11.01	28.08	33.08	14.99	0	21.16	2.7
6037115201	31.43	61.32	60-65%	Los Angeles	6647	6.51	82.91	10.58	28.76	51.56	2.35	0	14.31	3.02

6037115202	42.01	78.05	75-80%	Los Angeles	5684	9.2	80.44	10.36	40.02	32.23	7.28	0	14.92	5.54
6037115301	34.59	66.87	65-70%	Los Angeles	4524	9.99	68.41	21.6	19.47	50.75	3.32	0.02	24.23	2.21
6037115302	53.32	91.16	90-95%	Los Angeles	3957	13.01	76.93	10.06	70.53	13.24	5.66	0	9.81	0.76
6037115401	41.80	77.80	75-80%	Los Angeles	6373	13.51	76.92	9.57	50.51	31.59	3.97	0	11.44	2.49
6037115403	49.97	87.85	85-90%	Los Angeles	3583	13.54	75.36	11.11	55.12	21.85	6.34	0	14.15	2.54
6037115404	48.88	86.61	85-90%	Los Angeles	2800	7.93	81.54	10.54	47.61	24.57	7.04	0	18.18	2.61
6037117101	40.22	75.33	75-80%	Los Angeles	5224	11.5	83.31	5.19	39.22	8.29	8.31	0	39.61	4.58
6037117102	31.94	62.33	60-65%	Los Angeles	2861	10.66	76.69	12.65	62.15	22.26	2.06	0.17	11.57	1.78
6037117201	44.71	81.62	80-85%	Los Angeles	5191	15.45	72.34	12.21	67.39	8.78	5.59	0	12.96	5.28
6037117202	35.09	67.71	65-70%	Los Angeles	2633	13.29	65.36	21.34	30.57	28.9	9.3	0	27.31	3.91
6037117301	28.86	56.67	55-60%	Los Angeles	3910	10.82	73.79	15.4	34.68	41.13	2.4	0	18.26	3.53
6037117302	36.44	69.81	65-70%	Los Angeles	5229	11.23	70.11	18.67	25.4	41.33	11.15	0.25	18.42	3.46
6037117303	45.77	82.97	80-85%	Los Angeles	3754	10.18	75.09	14.73	45.18	31.89	3.94	0.08	16.25	2.66
6037117404	41.17	76.88	75-80%	Los Angeles	5324	10.11	78.63	11.27	42.09	37.36	1.24	0	15.31	4
6037117405	51.67	89.66	85-90%	Los Angeles	3574	19.11	77.73	3.16	92.75	1.4	3.08	0	2.77	0
6037117407	51.97	90.00	90-95%	Los Angeles	3836	23.64	73.8	2.55	95.46	0.44	1.28	0	2.35	0.47
6037117408	68.96	98.88	95-100% (highest scores)	Los Angeles	3073	22.36	72.89	4.75	79.89	3.77	4.72	0	10.84	0.78
6037117510	43.18	79.79	75-80%	Los Angeles	3687	22.32	70.87	6.81	79.66	9.44	3.47	0	7.43	0
6037117520	56.55	93.63	90-95%	Los Angeles	4168	18.83	77.76	3.41	82.29	4.08	5.73	0	7.37	0.53
6037117530	52.64	90.62	90-95%	Los Angeles	6742	16.42	77.17	6.41	79.68	5.59	1.85	0	11.29	1.59
6037119001	59.31	95.23	95-100% (highest scores)	Los Angeles	4435	10.62	76.14	13.24	71.25	13.03	0.32	0.56	13.51	1.33
6037119002	55.40	92.88	90-95%	Los Angeles	7976	12.26	75.31	12.42	83.3	5.14	1.12	0	9.6	0.84
6037119201	41.35	77.21	75-80%	Los Angeles	4547	11.39	77.85	10.75	87.66	4.82	0.66	0.88	5.85	0.13
6037119202	45.63	82.77	80-85%	Los Angeles	4759	12.69	75.2	12.1	88.8	3.66	0.74	0.55	6.22	0.04
6037119310	27.38	53.72	50-55%	Los Angeles	4087	9.69	75.07	15.24	65.72	14.02	4.26	0.15	15.86	0
6037119320	46.87	84.25	80-85%	Los Angeles	4906	12.82	79.49	7.68	69.83	5.5	6.03	0	17.55	1.08
6037119340	49.92	87.76	85-90%	Los Angeles	4264	23.71	72.94	3.35	93.79	0.09	3.71	0	2.42	0
6037119341	40.52	75.91	75-80%	Los Angeles	2890	11.18	73.84	14.98	53.98	13.88	4.74	0	26.71	0.69
6037119342	48.67	86.35	85-90%	Los Angeles	2911	16.9	76.23	6.87	77.26	6.97	1.99	0.65	12.99	0.14
6037119400	46.48	83.84	80-85%	Los Angeles	5499	11.84	76.81	11.35	81.29	7.22	1.35	0	8.82	1.33
6037119700	31.97	62.37	60-65%	Los Angeles	4913	11.46	72.85	15.69	46.63	25.59	3.64	0	22.15	1.99
6037119800	42.93	79.37	75-80%	Los Angeles	6054	7.28	82.04	10.67	75.97	8.24	1.12	0	13.12	1.55
6037119900	46.76	84.10	80-85%	Los Angeles	5245	9.57	77.48	12.95	67.23	8.9	0.74	0.61	21.39	1.12
6037120010	68.43	98.74	95-100% (highest scores)	Los Angeles	2704	9.43	80.81	9.76	73.41	8.32	2.77	0	15.5	0
6037120020	70.33	99.16	95-100% (highest scores)	Los Angeles	3872	12.45	77.61	9.94	73.58	2.2	7.31	0	16.37	0.54
6037120030	57.82	94.42	90-95%	Los Angeles	2666	15.3	74.98	9.71	87.85	3.15	2.7	0	6.3	0
6037120103	56.79	93.78	90-95%	Los Angeles	3452	22.28	72.42	5.3	93.74	1.83	1.54	0	2.9	0
6037120104	54.93	92.50	90-95%	Los Angeles	2228	12.16	79.4	8.44	64.95	10.73	6.55	0	15.84	1.93
6037120105	52.00	90.03	90-95%	Los Angeles	2832	12.64	71.82	15.54	76.02	5.69	1.24	0	17.06	0
6037120106	55.14	92.64	90-95%	Los Angeles	4763	16.46	77.72	5.82	80.5	2.71	1.53	0	15.26	0
6037120107	59.80	95.57	95-100% (highest scores)	Los Angeles	3893	20.32	75.13	4.55	87.26	3.29	1.82	0	7.16	0.46
6037120108	54.41	92.06	90-95%	Los Angeles	4732	17.22	74.81	7.97	82.92	8.18	2.66	0	5.63	0.61
6037120300	59.69	95.54	95-100% (highest scores)	Los Angeles	5238	10.16	76.94	12.91	63.82	14.81	1.09	0	19.66	0.61
6037120400	52.83	90.73	90-95%	Los Angeles	6769	13.36	75.82	10.83	57.13	17.42	5.19	0	18.69	1.58
6037121010	54.84	92.40	90-95%	Los Angeles	4934	10.48	74.5	15.02	56.67	31.82	0.67	0	10.84	0
6037121020	62.66	96.90	95-100% (highest scores)	Los Angeles	3610	9.56	80.75	9.7	58.84	26.07	2.44	0	12.11	0.55
6037121101	52.60	90.60	90-95%	Los Angeles	2862	11.91	80.4	7.69	69.74	17.44	0.98	0	9.5	2.34
6037121102	46.99	84.43	80-85%	Los Angeles	2479	8.63	73.74	17.63	48.49	45.95	0	0	4.07	1.49
6037121210	42.54	78.72	75-80%	Los Angeles	2926	10.05	70.44	19.51	73.21	9.6	1.67	0	12.27	3.25
6037121221	49.61	87.44	85-90%	Los Angeles	2420	11.28	76.32	12.4	83.47	11.9	0.54	0	2.81	1.28
6037121222	68.65	98.79	95-100% (highest scores)	Los Angeles	5139	15.96	75.91	8.13	90.15	5.45	1.03	0.16	2.51	0.7
6037121600	53.09	90.95	90-95%	Los Angeles	2735	9.84	72.29	17.88	33.27	39.05	1.35	0	23.44	2.89
6037121801	45.70	82.85	80-85%	Los Angeles	3127	7.16	82.35	10.49	74.19	18.16	3.04	0	2.91	1.69
6037121802	59.39	95.30	95-100% (highest scores)	Los Angeles	3216	12.9	75.03	12.06	60.14	26.4	6.09	0	6.47	0.9
6037121900	68.18	98.66	95-100% (highest scores)	Los Angeles	3761	12.04	77.69	10.26	77.85	17.36	2.37	0	2.42	0
6037122000	59.45	95.34	95-100% (highest scores)	Los Angeles	5892	8.55	75.32	16.12	48.59	35.9	2.97	0	9.32	3.22
6037122120	47.67	85.10	85-90%	Los Angeles	5011	12.01	77.59	10.4	80.88	10.48	3.71	0	1.78	3.15
6037122121	57.71	94.35	90-95%	Los Angeles	2829	12.34	77.41	10.25	79.99	8.94	4.31	0.25	5.73	0.78

6037122122	62.14	96.57	95-100% (highest scores)	Los Angeles	2728	16.61	73.64	9.75	95.23	4	0	0	0.77	0
6037122200	58.79	94.97	90-95%	Los Angeles	3469	9.28	80.63	10.09	75.12	19.46	0.35	0	2.42	2.65
6037122410	70.04	99.09	95-100% (highest scores)	Los Angeles	3457	11.74	78.91	9.34	78.97	12.35	2.83	0	4.37	1.48
6037122420	67.86	98.55	95-100% (highest scores)	Los Angeles	4503	8.04	83.61	8.35	76.06	15.06	1.71	0	7.04	0.13
6037123010	53.42	91.26	90-95%	Los Angeles	4027	13.51	77.08	9.41	82.54	12.96	1.81	0	2.43	0.25
6037123020	58.72	94.93	90-95%	Los Angeles	3250	12.25	74.43	13.32	85.66	8.4	1.54	0	2.92	1.48
6037123103	56.66	93.72	90-95%	Los Angeles	3808	7.85	80.57	11.58	54.39	29.41	5.44	0	10.35	0.42
6037123104	36.23	69.48	65-70%	Los Angeles	4416	14.65	71.72	13.63	61.21	26.45	3.28	0	7.02	2.04
6037123203	54.62	92.23	90-95%	Los Angeles	4094	15.34	79.53	5.13	75.13	12.8	10.75	0	0.1	1.22
6037123204	50.94	88.78	85-90%	Los Angeles	3129	12.21	83.8	3.99	73.09	16.94	4.57	0	4.57	0.83
6037123205	56.52	93.60	90-95%	Los Angeles	2492	9.79	82.91	7.3	75.92	18.38	3.85	0	1.85	0
6037123206	58.30	94.64	90-95%	Los Angeles	2572	12.64	77.6	9.76	84.68	10.77	0.74	0	2.33	1.48
6037123301	57.74	94.36	90-95%	Los Angeles	4530	10.31	74.97	14.72	36	30.2	4.64	0	27.4	1.77
6037123303	65.23	97.89	95-100% (highest scores)	Los Angeles	3087	10.33	77.91	11.76	57.11	33.3	1.62	0	5.25	2.72
6037123304	59.67	95.50	95-100% (highest scores)	Los Angeles	4362	9.31	68.52	22.17	45.37	44.66	1.26	0	6.63	2.09
6037123410	50.82	88.69	85-90%	Los Angeles	4181	10.17	81.68	8.16	54.01	37.86	2.13	0	5.84	0.17
6037123420	48.21	85.75	85-90%	Los Angeles	4408	13.93	75.48	10.59	54.4	34.62	4.61	0	6.37	0
6037123510	40.37	75.63	75-80%	Los Angeles	4795	8.91	75.39	15.7	48.99	35.79	3.32	0.31	6.01	5.59
6037123520	42.98	79.46	75-80%	Los Angeles	2816	13.1	76.21	10.69	58.17	38.42	0.18	0	1.81	1.42
6037123601	31.98	62.38	60-65%	Los Angeles	4803	8.47	75.99	15.53	35.27	53.82	5.85	0	2.46	2.6
6037123602	38.63	73.05	70-75%	Los Angeles	3659	7.6	76	16.4	34.49	52.42	7.13	0	4.37	1.59
6037123700	39.55	74.22	70-75%	Los Angeles	4435	7.55	75.78	16.66	30.64	59.41	4.69	0.56	2.25	2.44
6037123800	40.88	76.41	75-80%	Los Angeles	6018	9.39	77.42	13.19	25.79	62.99	6.13	0.32	3.36	1.41
6037123901	44.01	80.85	80-85%	Los Angeles	4696	10.63	80.81	8.56	51.47	28.83	6.92	0	11.25	1.53
6037123902	29.10	57.03	55-60%	Los Angeles	2668	11.13	77.77	11.09	28.6	52.17	3.22	0	13.91	2.1
6037124000	27.36	53.66	50-55%	Los Angeles	5219	13.83	69.63	16.54	13.95	72.7	2.28	0	5.23	5.84
6037124102	40.39	75.67	75-80%	Los Angeles	3551	9.38	81.19	9.43	50.8	35.06	3.6	0	4.98	5.55
6037124103	58.67	94.87	90-95%	Los Angeles	1950	12.87	72.62	14.51	65.33	24.36	2	0	7.13	1.18
6037124104	51.47	89.42	85-90%	Los Angeles	2492	12.6	79.05	8.35	59.11	28.25	6.78	0	1.52	4.33
6037124105	36.97	70.54	70-75%	Los Angeles	2538	14.34	78.84	6.82	56.54	32.35	3.19	0.51	5.08	2.32
6037124201	53.26	91.07	90-95%	Los Angeles	3348	13.29	72.49	14.22	61.44	30.08	0.27	0	6.99	1.22
6037124203	45.42	82.48	80-85%	Los Angeles	2384	8.6	80.03	11.37	56.92	33.22	1.93	0	5.83	2.1
6037124204	59.30	95.22	95-100% (highest scores)	Los Angeles	2192	6.8	83.21	9.99	55.47	30.25	3.19	0	5.11	5.98
6037124300	45.95	83.17	80-85%	Los Angeles	2988	8.17	76.61	15.23	58	32.93	1.81	0	5.19	2.07
6037124400	24.08	46.92	45-50%	Los Angeles	4858	13.22	73.08	13.71	19.02	69.51	2.9	0	4.51	4.06
6037124500	28.38	55.70	55-60%	Los Angeles	2925	16.21	73.03	10.77	17.88	60.24	3.04	0	5.85	12.99
6037124600	33.37	64.73	60-65%	Los Angeles	2691	2.97	79.52	17.5	12.63	67.82	5.13	0.45	3.38	10.59
6037124700	24.68	48.13	45-50%	Los Angeles	5539	6.73	76.78	16.48	17.15	72.05	1.12	0	5.46	4.22
6037124902	33.15	64.31	60-65%	Los Angeles	2706	9.39	69.14	21.47	19.36	56.91	12.71	0	5.69	5.32
6037124903	32.48	63.28	60-65%	Los Angeles	3499	6.14	76.82	17.03	26.21	56.84	6.54	0.34	7.29	2.77
6037125100	29.73	58.17	55-60%	Los Angeles	5892	11.97	73	15.04	20.18	61.73	8.71	0.34	7.23	1.82
6037125200	35.96	69.09	65-70%	Los Angeles	3907	15.87	75.17	8.96	31.2	52.14	2.23	0	6.12	8.32
6037125310	45.96	83.21	80-85%	Los Angeles	4313	7.7	82.84	9.46	40.76	39.65	15.44	0	2.16	1.99
6037125320	49.07	86.84	85-90%	Los Angeles	5106	2.86	82.3	14.85	27.81	49.47	6.19	0.92	11.69	3.92
6037125401	32.59	63.41	60-65%	Los Angeles	4966	2.34	92.11	5.56	18.69	52.58	14.56	0	12.3	1.87
6037125402	32.93	63.87	60-65%	Los Angeles	4889	7.92	86.54	5.54	17	65.33	5.81	0	7.16	4.7
6037125501	41.09	76.78	75-80%	Los Angeles	3052	5.37	87.09	7.54	19.86	59.76	10.39	0.16	7.86	1.97
6037125502	28.22	55.35	55-60%	Los Angeles	3488	5.28	81.11	13.62	16.8	64.82	4.96	0	10.76	2.67
6037125600	33.27	64.52	60-65%	Los Angeles	2811	12.81	69.48	17.72	25.44	62.01	2.56	0	6.83	3.17
6037127102	60.57	96.04	95-100% (highest scores)	Los Angeles	5779	15.57	78.16	6.26	72.05	13.48	5.38	0	6.58	2.51
6037127103	52.29	90.36	90-95%	Los Angeles	3109	20.33	69.96	9.71	58.54	24.61	3.73	0	7.66	5.47
6037127104	63.14	97.14	95-100% (highest scores)	Los Angeles	3821	12.9	78.51	8.58	51.71	37.61	2.8	0	6.39	1.49
6037127210	65.37	97.93	95-100% (highest scores)	Los Angeles	5838	15.42	76.72	7.86	60.83	17.78	10.71	0	9.71	0.98
6037127220	64.96	97.82	95-100% (highest scores)	Los Angeles	5045	10.37	75.72	13.91	62.85	22.22	5.11	0	7.41	2.4
6037127300	52.02	90.08	90-95%	Los Angeles	3809	12.18	74.53	13.28	58.15	21.82	4.65	0.92	11.77	2.7
6037127400	71.85	99.32	95-100% (highest scores)	Los Angeles	6558	19.73	74.34	5.93	76.75	16.3	1.14	0.24	4.09	1.48
6037127520	58.51	94.79	90-95%	Los Angeles	4870	16.47	74.27	9.26	76.61	10.02	5.22	0.16	7.1	0.88
6037127603	50.45	88.33	85-90%	Los Angeles	3068	17.54	76.53	5.93	80.93	14.99	1.56	0	2.25	0.26

6037127604	54.19	91.78	90-95%	Los Angeles	3157	13.78	71.97	14.25	63.26	23.88	0.89	0	9.31	2.66
6037127605	49.68	87.48	85-90%	Los Angeles	4329	18.83	78.75	2.43	77.57	8.2	2.33	0.6	7.76	3.53
6037127606	51.44	89.37	85-90%	Los Angeles	3322	12.46	75.35	12.19	59.87	23.18	5	0.36	9.9	1.69
6037127711	64.04	97.49	95-100% (highest scores)	Los Angeles	3588	14.99	75.11	9.89	52.95	31.13	8.14	0	6.88	0.89
6037127712	43.48	80.11	80-85%	Los Angeles	3560	15.06	77.56	7.39	53.82	30.39	8.57	0	6.21	1.01
6037127803	53.41	91.25	90-95%	Los Angeles	4790	17.72	64.66	17.62	61.15	27.49	3.15	0.27	5.7	2.23
6037127804	47.76	85.20	85-90%	Los Angeles	4352	10.98	81.32	7.7	48.6	30.88	4.78	0.51	12.48	2.76
6037127805	46.00	83.26	80-85%	Los Angeles	3627	9.98	75.57	14.45	66.06	18	7.89	0	7.72	0.33
6037127806	43.96	80.75	80-85%	Los Angeles	3293	8.32	82.39	9.29	60.31	23.81	4.37	0	9.9	1.61
6037127910	52.73	90.68	90-95%	Los Angeles	5097	11.56	77.83	10.61	75.32	13.07	4.55	0	7	0.06
6037127920	55.78	93.09	90-95%	Los Angeles	4716	15.78	75.76	8.46	59.14	32.12	1.02	0	4.24	3.48
6037128101	41.51	77.33	75-80%	Los Angeles	3735	11.94	76.79	11.27	50.58	38.74	3.37	0.21	4.77	2.33
6037128102	45.94	83.14	80-85%	Los Angeles	4625	11.09	82.38	6.53	62.12	20.84	7.26	0	8.15	1.62
6037128210	53.53	91.35	90-95%	Los Angeles	5008	14.4	82.11	3.49	77.7	10.14	6.57	0	4.05	1.54
6037128220	45.78	82.99	80-85%	Los Angeles	2912	9.75	78.61	11.64	42.31	47.63	3.95	0	4.53	1.58
6037128302	64.22	97.55	95-100% (highest scores)	Los Angeles	5000	12.66	79.06	8.28	77.92	15.06	3.06	0	2.58	1.38
6037128303	64.47	97.63	95-100% (highest scores)	Los Angeles	4176	18.94	76.32	4.74	85.08	12.74	0.48	0	1.7	0
6037128400	51.90	89.91	85-90%	Los Angeles	4502	12.59	76.45	10.95	32.23	48.62	8.2	0	8.31	2.64
6037128500	36.89	70.40	70-75%	Los Angeles	4108	9.52	76.39	14.09	15.92	59.23	6.96	0	9.25	8.64
6037128601	49.96	87.83	85-90%	Los Angeles	4369	12.68	80.43	6.89	45.85	38.16	5.42	0	8.22	2.36
6037128602	29.48	57.78	55-60%	Los Angeles	3472	8.35	75.26	16.39	16.33	75.63	2.88	0	3.31	1.84
6037128702	26.96	52.94	50-55%	Los Angeles	5810	7.04	75.54	17.42	21.6	56.63	9.47	0	7.93	4.37
6037128801	34.18	66.21	65-70%	Los Angeles	3419	6.58	78.65	14.77	17.29	54.08	5.85	0	14.16	8.63
6037128802	23.51	45.60	45-50%	Los Angeles	4670	14.22	71.48	14.3	16.19	60.96	4.48	0	14.37	4
6037128910	33.71	65.32	65-70%	Los Angeles	4657	12.09	76.89	11.02	15.74	61.61	7.06	0	8.44	7.15
6037131010	47.53	84.98	80-85%	Los Angeles	6686	12.64	80.05	7.31	57.57	21.81	2.02	0.03	15.85	2.72
6037131020	57.51	94.21	90-95%	Los Angeles	6704	13.69	78.49	7.82	69.63	15.83	2.94	0	8.28	3.33
6037131100	46.37	83.76	80-85%	Los Angeles	3197	10.76	73.41	15.83	44.14	41.41	0.69	0	9.73	4.04
6037131200	28.54	55.99	55-60%	Los Angeles	3417	8.57	75.07	16.36	43.2	45.48	3.92	0	6.2	1.2
6037131300	38.14	72.39	70-75%	Los Angeles	5102	11.92	74.93	13.15	62.49	19.52	2.51	0	14.23	1.25
6037131400	43.02	79.54	75-80%	Los Angeles	6367	10.46	74.65	14.89	43.29	28.49	4.41	0	20.59	3.22
6037131600	37.57	71.43	70-75%	Los Angeles	5336	8.86	78.35	12.78	56.71	25.69	3	0	12.11	2.49
6037131701	43.32	79.94	75-80%	Los Angeles	5587	11.47	75.89	12.64	50.67	28.08	5.05	0.7	11.83	3.67
6037131702	45.40	82.45	80-85%	Los Angeles	3770	8.99	79.31	11.7	49.52	16.15	15.57	1.62	16.58	0.56
6037131800	50.07	87.97	85-90%	Los Angeles	6157	15.1	73.28	11.61	58.7	17.8	7.84	0	11.35	4.3
6037131900	37.11	70.73	70-75%	Los Angeles	4597	8.31	79.16	12.53	43.14	38.57	5.07	0	9.27	3.96
6037132001	51.24	89.13	85-90%	Los Angeles	3463	9.76	79.09	11.15	32	40.54	4.42	0	12.42	10.63
6037132002	49.20	87.03	85-90%	Los Angeles	3354	13.18	73.64	13.18	44.84	39.59	5.64	0	2.42	7.51
6037132101	42.82	79.24	75-80%	Los Angeles	4645	12.66	78.47	8.87	48.35	26.59	9.04	0.32	8.44	7.26
6037132102	57.87	94.45	90-95%	Los Angeles	5401	9.29	76.45	14.26	44.36	28.87	6.02	0	17.9	2.85
6037132300	49.42	87.29	85-90%	Los Angeles	7912	10.52	80.78	8.71	61.88	20.15	0.72	1.26	15.31	0.68
6037132501	43.25	79.85	75-80%	Los Angeles	4566	13.67	68.4	17.94	55.28	32.87	1.62	0	7.54	2.69
6037132502	45.23	82.24	80-85%	Los Angeles	3922	7.85	76.29	15.86	36.54	46.46	5.25	0	9.48	2.27
6037132700	52.43	90.44	90-95%	Los Angeles	4873	14.45	74.62	10.94	62.63	26.19	0.7	0	7.74	2.75
6037132900	49.23	87.08	85-90%	Los Angeles	3885	10.06	72.82	17.12	23.58	58.48	1.72	0	10.3	5.92
6037133000	48.14	85.67	85-90%	Los Angeles	4778	11.05	74.55	14.4	51.65	37	0.54	0	9.65	1.15
6037133100	51.71	89.71	85-90%	Los Angeles	5609	10.71	68.53	20.75	30.67	50.88	4.87	0.5	10.3	2.78
6037134001	49.80	87.63	85-90%	Los Angeles	3864	11.39	79.92	8.7	73.63	11.88	0.28	0	13.02	1.19
6037134002	36.09	69.31	65-70%	Los Angeles	3665	13.51	72.63	13.86	51.51	31.51	3.9	0.22	11.71	1.15
6037134101	42.94	79.40	75-80%	Los Angeles	5579	17.94	69.91	12.15	51.44	18.91	2.49	0	20.68	6.47
6037134103	40.45	75.74	75-80%	Los Angeles	4659	9.87	72.57	17.56	46.62	32.67	6.1	0.84	12.4	1.37
6037134104	42.48	78.64	75-80%	Los Angeles	4618	12.52	76.4	11.09	42.31	21	6.89	0	28.04	1.75
6037134201	38.69	73.12	70-75%	Los Angeles	4735	15.14	74.49	10.37	51.93	29.17	2.58	0	13.26	3.06
6037134302	32.94	63.93	60-65%	Los Angeles	4112	9.97	77.24	12.79	30.06	45.21	1.68	0	20.67	2.38
6037134303	41.06	76.74	75-80%	Los Angeles	5942	7.02	76.98	16	39.94	38.37	1.68	0.91	14.78	4.33
6037134304	41.05	76.71	75-80%	Los Angeles	3042	10.88	71.24	17.88	31.07	32.31	7.3	0	22.98	6.34
6037134305	48.38	86.03	85-90%	Los Angeles	4183	18.67	78.75	2.58	83.03	6.22	1.43	0	8.73	0.6
6037134306	31.92	62.29	60-65%	Los Angeles	4305	14.31	73.64	12.06	53.54	25.76	6.62	0	12.22	1.86

6037134421	9.85	12.53	10-15%	Los Angeles	4234	6.21	75.53	18.26	7.58	76.22	2.69	0.38	9.05	4.09
6037134422	20.46	38.60	35-40%	Los Angeles	4924	13.55	70.06	16.39	16.15	55.24	3.8	0	21.53	3.29
6037134423	18.79	34.71	30-35%	Los Angeles	3539	9.24	66.57	24.19	7.71	64.96	8.45	0	13.65	5.23
6037134424	16.01	27.89	25-30%	Los Angeles	2916	6.86	70.44	22.7	6.21	67.83	1.75	0	18.45	5.76
6037134520	53.20	91.02	90-95%	Los Angeles	6065	15.25	75.56	9.18	73.4	11.79	2.92	0	10.4	1.48
6037134521	52.00	90.04	90-95%	Los Angeles	3691	15.58	80.68	3.74	90.14	2	0.19	0	6.56	1.11
6037134522	55.01	92.55	90-95%	Los Angeles	4167	15.48	77.39	7.13	77.47	13.13	4.27	0	2.18	2.95
6037134710	52.93	90.82	90-95%	Los Angeles	5836	14.43	75.51	10.06	66.52	14.56	2.04	0.03	15.42	1.42
6037134720	50.01	87.90	85-90%	Los Angeles	5074	11.59	78.38	10.03	46.57	19.06	5.5	0	21.48	7.39
6037134800	45.67	82.82	80-85%	Los Angeles	6399	9.1	78.36	12.55	41.57	31.86	3.38	0	21.57	1.63
6037134901	35.09	67.73	65-70%	Los Angeles	3140	9.01	74.39	16.59	24.52	59.01	5.25	0	8.54	2.68
6037134903	48.46	86.12	85-90%	Los Angeles	6919	13.82	83.03	3.15	51.45	23.02	4.54	0	17.76	3.22
6037134904	37.25	70.88	70-75%	Los Angeles	4043	7.89	81.62	10.49	54.69	31.39	5.71	0.27	6.9	1.04
6037134905	34.98	67.56	65-70%	Los Angeles	4552	5.05	86.4	8.55	13.14	57.38	11.18	0	14.57	3.73
6037135102	18.74	34.61	30-35%	Los Angeles	3726	9.45	74.07	16.48	15.92	61.92	5.93	0	10.9	5.34
6037135111	28.90	56.76	55-60%	Los Angeles	3313	12.38	76.15	11.47	29.34	44.64	2.93	0	20.77	2.32
6037135113	26.62	52.24	50-55%	Los Angeles	3485	13.63	73.66	12.71	18.71	47.72	4.65	0.34	22.01	6.57
6037135114	35.19	67.86	65-70%	Los Angeles	5106	10.48	75.42	14.1	16.41	49.41	3.09	0.55	27.65	2.88
6037135201	14.37	23.99	20-25%	Los Angeles	2788	10.4	72.27	17.32	12.48	56.17	10.33	0	16.93	4.09
6037135202	22.94	44.34	40-45%	Los Angeles	4708	14.55	72.07	13.38	13.93	57.09	3.57	0.51	15.91	8.98
6037135203	15.62	26.95	25-30%	Los Angeles	7515	13.72	68.42	17.86	8.25	70.55	1.92	0	14.6	4.68
6037137103	30.08	58.81	55-60%	Los Angeles	5382	10.74	71.26	18	15.79	63.17	1.41	0.46	18.49	0.67
6037137104	33.22	64.45	60-65%	Los Angeles	2754	11.04	65.4	23.57	14.67	68.88	2.32	0	8.32	5.81
6037137201	31.93	62.32	60-65%	Los Angeles	6029	9.16	80.21	10.63	19.54	55.32	5.03	0	14.46	5.66
6037137301	12.93	20.39	20-25%	Los Angeles	2271	5.42	76.44	18.14	7.53	73.93	3.7	0.09	6.16	8.59
6037137302	15.03	25.63	25-30%	Los Angeles	4449	9.58	67.36	23.06	7.08	79.5	1.46	0	8.51	3.44
6037137401	16.47	29.01	25-30%	Los Angeles	4299	14	71.46	14.54	15.31	71.37	1.81	0	8.86	2.65
6037137402	27.55	54.01	50-55%	Los Angeles	5365	11.54	63.93	24.53	14.11	74.93	3.09	0	5.03	2.83
6037137501	29.77	58.23	55-60%	Los Angeles	4915	14.38	72.25	13.37	17.92	64.56	6.84	0	6.63	4.05
6037137502	25.99	50.98	50-55%	Los Angeles	4549	11.74	69.62	18.64	10.51	68.48	7.89	0.77	6.7	5.65
6037137504	5.81	4.31	1-5% (lowest scores)	Los Angeles	2155	6.26	68.49	25.24	4.83	87.52	0.97	1.02	2.69	2.97
6037138000	12.24	18.53	15-20%	Los Angeles	4780	11.21	66.05	22.74	7.66	72.07	7.36	0.21	7.72	4.98
6037139001	31.71	61.85	60-65%	Los Angeles	5639	14.86	70.67	14.47	18.5	71.32	0.53	0	5.8	3.85
6037139200	28.86	56.68	55-60%	Los Angeles	5662	10.99	73.03	15.98	17.33	67.54	1.29	0	11.67	2.17
6037139301	34.53	66.77	65-70%	Los Angeles	4445	11.81	70.08	18.11	14.22	64.95	7.29	0	7.76	5.78
6037139302	49.21	87.05	85-90%	Los Angeles	5000	10.5	77.78	11.72	32.24	47.3	7.6	0.1	8.64	4.12
6037139303	43.75	80.43	80-85%	Los Angeles	4260	9.6	78.05	12.35	18.05	58.31	15.19	0	3.78	4.67
6037139401	37.23	70.84	70-75%	Los Angeles	2706	10.46	70.58	18.96	17.66	70.73	5.4	0	4.92	1.29
6037139402	25.73	50.45	50-55%	Los Angeles	2899	14.49	62.19	23.32	6.55	80.58	7.69	0	2.04	3.14
6037139502	35.22	67.90	65-70%	Los Angeles	2917	11.83	64.59	23.59	12.51	76.48	0.48	0	5.31	5.21
6037139503	32.92	63.84	60-65%	Los Angeles	5946	9.03	72.18	18.79	20.08	71.88	2.64	0	4.2	1.19
6037139504	49.69	87.52	85-90%	Los Angeles	3998	8.95	73.66	17.38	11.53	75.09	3.8	0	4.93	4.65
6037139600	32.64	63.51	60-65%	Los Angeles	5060	12.19	66.76	21.05	8.06	76.11	2.19	0	11.42	2.21
6037139701	13.19	20.86	20-25%	Los Angeles	5320	9.77	70.24	19.98	11.11	72.44	2.18	0.55	5.85	7.88
6037139702	12.18	18.38	15-20%	Los Angeles	6447	11.76	64.22	24.03	4.45	86.26	3.32	0	3.83	2.14
6037139703	15.59	26.87	25-30%	Los Angeles	2861	13.25	64	22.75	0.98	80.6	3.91	0	6.43	8.07
6037139801	20.95	39.90	35-40%	Los Angeles	3488	7.71	65.51	26.78	6.05	78.44	5.88	0	2.32	7.31
6037139802	9.89	12.64	10-15%	Los Angeles	4126	11.42	63.16	25.42	6.86	73.17	4.99	0	10.03	4.94
6037141101	32.07	62.51	60-65%	Los Angeles	4674	17.16	74.15	8.69	14.76	61.23	14.87	0	5.58	3.55
6037141102	24.61	47.98	45-50%	Los Angeles	3074	12.62	73.85	13.53	9.08	72.38	3.87	0	6.31	8.36
6037141201	24.81	48.31	45-50%	Los Angeles	4583	10.89	80.23	8.88	17.52	66.18	7.92	0	3.38	5
6037141202	18.48	33.86	30-35%	Los Angeles	2674	10.1	78.76	11.14	10.96	71.77	4.49	0	7.74	5.05
6037141302	29.25	57.35	55-60%	Los Angeles	6037	8.75	79.97	11.28	16.55	65.12	8	0	7.57	2.77
6037141303	27.49	53.91	50-55%	Los Angeles	3477	6.96	77.8	15.24	13.83	68.85	3.6	0.23	7.54	5.95
6037141304	25.72	50.39	50-55%	Los Angeles	2995	11.95	75.26	12.79	10.12	79.97	2.7	0	4.44	2.77
6037141400	18.33	33.56	30-35%	Los Angeles	5099	12.14	66.66	21.2	8.53	74.13	7.02	0	7.77	2.55
6037141500	8.18	8.89	5-10%	Los Angeles	2982	12.51	64.05	23.44	4.63	82.96	3.19	0	7.75	1.48
6037141600	14.56	24.48	20-25%	Los Angeles	4178	10.44	68.81	20.75	9.14	75.56	3.95	0	7.56	3.78

6037141700	7.46	7.51	5-10%	Los Angeles	3161	10.5	69.57	19.93	5.92	82.38	1.52	0	6.86	3.32
6037143100	23.07	44.72	40-45%	Los Angeles	4389	8.25	79.61	12.14	22.1	61.81	3.08	0	9.11	3.9
6037143200	31.76	61.98	60-65%	Los Angeles	4085	5.24	85.19	9.57	16.87	65.83	3.45	0	6.86	7
6037143300	22.53	43.31	40-45%	Los Angeles	6643	9.11	75.01	15.88	16.17	65	8.05	0.44	7.26	3.09
6037143400	13.84	22.58	20-25%	Los Angeles	7056	12.5	70.62	16.88	12.76	73.16	3.12	0.5	5.73	4.75
6037143500	24.12	47.01	45-50%	Los Angeles	5482	11.78	76.92	11.29	9.01	76.82	5.82	0	3.34	5.02
6037143602	15.66	27.00	25-30%	Los Angeles	4769	7.74	75.09	17.17	5.58	73.12	4.34	0	13.92	3.04
6037143603	27.02	53.08	50-55%	Los Angeles	2392	6.77	80.02	13.21	7.11	74.62	2.51	0	9.62	6.15
6037143604	34.78	67.22	65-70%	Los Angeles	3720	6.8	89.3	3.9	6.61	57.1	9.22	1.4	19.11	6.56
6037143700	11.94	17.75	15-20%	Los Angeles	3811	10.05	77.46	12.49	6.06	78.72	0.97	0	7.22	7.03
6037143800	15.69	27.11	25-30%	Los Angeles	5770	12.36	71.8	15.84	11.13	75.3	4.64	0	6.62	2.31
6037143901	12.91	20.28	20-25%	Los Angeles	4069	11.87	65.77	22.36	10.79	80	0.79	0	4.18	4.25
6037143902	5.96	4.59	1-5% (lowest scores)	Los Angeles	2766	7.48	74.44	18.08	10.74	79.43	1.48	0	6.25	2.1
6037181000	27.99	54.92	50-55%	Los Angeles	6458	13.21	67.17	19.62	35.21	34.87	0.39	0.63	24.48	4.41
6037181300	29.15	57.14	55-60%	Los Angeles	4059	10.99	70.95	18.06	27.69	35.99	1.58	0	31.19	3.55
6037181400	26.11	51.11	50-55%	Los Angeles	4943	8.52	75.48	16	36.01	25.37	2.31	0.18	34.94	1.19
6037181500	23.77	46.14	45-50%	Los Angeles	3956	10.49	72.88	16.63	38.62	36.1	0.86	0	22.75	1.67
6037181600	20.64	39.17	35-40%	Los Angeles	4631	7.67	83.18	9.16	32.91	32.37	2.81	0	24.55	7.36
6037183101	32.34	63.04	60-65%	Los Angeles	3323	12.49	70	17.51	56.49	29.58	0.21	0.45	10.86	2.41
6037183103	36.29	69.57	65-70%	Los Angeles	4355	12.35	78.48	9.16	66.91	13.25	6.13	1.81	9.09	2.8
6037183104	22.32	42.81	40-45%	Los Angeles	2146	8.76	71.81	19.43	53.68	26	2.05	0	16.26	2
6037183220	30.61	59.86	55-60%	Los Angeles	4155	11.46	73.79	14.75	64.55	16.22	0.19	0.1	14.03	4.91
6037183221	23.49	45.56	45-50%	Los Angeles	3522	9.03	78.93	12.04	71.61	17.12	0.03	0.34	9.77	1.14
6037183222	23.20	44.91	40-45%	Los Angeles	3493	10.33	69.08	20.58	39.91	35.41	3.18	0	16.83	4.67
6037183300	25.23	49.32	45-50%	Los Angeles	3487	7.54	78.98	13.48	62.43	17.46	0.46	0	18.76	0.89
6037183401	26.91	52.86	50-55%	Los Angeles	2531	8.06	77.76	14.18	56.66	23.03	0.24	0	17.5	2.57
6037183402	27.69	54.30	50-55%	Los Angeles	3006	8.48	79.47	12.04	38.32	22.95	2.73	0.2	31.1	4.69
6037183510	26.46	51.83	50-55%	Los Angeles	2577	8.5	77.96	13.54	69.85	21.3	0	0	8.3	0.54
6037183520	35.95	69.07	65-70%	Los Angeles	3758	12.45	79.7	7.85	79.46	14.72	0.24	0.03	2.02	3.54
6037183610	35.60	68.56	65-70%	Los Angeles	3215	13.53	76.49	9.98	74.09	12.19	0.65	0.31	9.27	3.48
6037183620	39.57	74.24	70-75%	Los Angeles	3111	12.34	75.18	12.47	62.58	18.71	3.05	0.58	12.99	2.09
6037183701	30.65	59.96	55-60%	Los Angeles	3720	10.67	77.8	11.53	64.44	20.48	1.8	0.56	10.19	2.53
6037183702	29.13	57.10	55-60%	Los Angeles	2775	12.29	77.37	10.34	58.92	17.59	5.51	0	12.54	5.44
6037183810	40.67	76.10	75-80%	Los Angeles	4163	14.2	79.63	6.17	80.54	13.14	1.49	0.41	3.63	0.79
6037183820	38.97	73.40	70-75%	Los Angeles	3445	12.1	85.08	2.82	75.82	9.99	2.73	0.41	9.29	1.77
6037185100	19.59	36.46	35-40%	Los Angeles	6070	8.9	79.62	11.48	43.74	36.52	3.57	0	13.23	2.93
6037185202	33.11	64.21	60-65%	Los Angeles	3627	11.58	73.39	15.03	53.54	32.51	2.48	0	10.84	0.63
6037185203	56.30	93.41	90-95%	Los Angeles	3566	14.39	77.06	8.55	77.45	11.08	0.64	0	8.08	2.75
6037185204	24.01	46.77	45-50%	Los Angeles	1921	7.6	68.45	23.95	32.12	31.39	1.67	0	29.31	5.52
6037185310	56.46	93.55	90-95%	Los Angeles	3131	13.99	73.52	12.49	83.9	5.97	1.31	0	8.82	0
6037185320	68.57	98.78	95-100% (highest scores)	Los Angeles	2991	12.2	77.06	10.73	84.32	9.93	0.6	0	5.15	0
6037186100	27.88	54.74	50-55%	Los Angeles	4985	10.81	73.68	15.51	32.78	33.2	2.23	0	26.88	4.91
6037186201	18.53	34.03	30-35%	Los Angeles	3201	10.15	73.73	16.12	50.89	11.5	4.19	0	31.37	2.06
6037186202	23.93	46.61	45-50%	Los Angeles	2007	9.72	78.23	12.06	43.65	25.46	1.3	0	27.06	2.54
6037186203	15.35	26.32	25-30%	Los Angeles	3416	13.44	72.98	13.58	45.93	32.38	0.88	0	13.82	7
6037186301	55.97	93.24	90-95%	Los Angeles	2906	12.63	78.32	9.05	68.89	17.69	6.64	0	4.47	2.31
6037186302	41.41	77.27	75-80%	Los Angeles	5096	10.38	74.92	14.7	49.1	28.28	1.16	0	17.17	4.3
6037186401	64.05	97.50	95-100% (highest scores)	Los Angeles	3489	17.8	72.69	9.52	79.54	6.16	0	0	14.07	0.23
6037186403	59.50	95.39	95-100% (highest scores)	Los Angeles	2698	11.08	70.39	18.53	64.75	10.01	1.52	0	22.91	0.82
6037186404	41.68	77.62	75-80%	Los Angeles	2631	12.77	77.69	9.54	69.14	11.44	0.53	0	18.89	0
6037187101	35.35	68.07	65-70%	Los Angeles	3438	7.18	70.33	22.48	41.48	36.07	0.7	0	20.04	1.72
6037187102	62.45	96.77	95-100% (highest scores)	Los Angeles	3739	11.96	74.59	13.45	55.82	19.79	2.14	0.4	19.87	1.98
6037187200	39.71	74.53	70-75%	Los Angeles	2963	8.88	79.45	11.68	74.59	12.59	0.2	0	10.12	2.5
6037187300	32.75	63.62	60-65%	Los Angeles	3597	8.73	80.23	11.04	21.91	57.85	1	0	14.07	5.17
6037188100	45.51	82.58	80-85%	Los Angeles	3918	7.94	81.62	10.44	56.69	27.49	1.48	0	7.96	6.38
6037188201	33.10	64.20	60-65%	Los Angeles	3473	8.58	83.1	8.32	13.25	63.72	3.92	3.02	12.44	3.66
6037188202	32.01	62.43	60-65%	Los Angeles	2426	8.12	70.94	20.94	11.42	64.8	3.63	0	14.43	5.73
6037188300	39.67	74.41	70-75%	Los Angeles	3800	11.47	72.74	15.79	29.53	35.18	0.34	3.32	26.55	5.08

6037189101	30.39	59.47	55-60%	Los Angeles	2521	8.53	78.74	12.73	7.97	69.42	0.44	0	19.36	2.82
6037189102	29.06	56.96	55-60%	Los Angeles	3356	6.62	79.44	13.95	17.82	69.46	0.74	0	7.24	4.74
6037189201	40.55	75.95	75-80%	Los Angeles	3216	6.5	81.44	12.06	11.07	72.17	4.51	0	8.64	3.61
6037189202	29.93	58.52	55-60%	Los Angeles	2396	9.06	72.37	18.57	7.68	78.55	0.83	0	8.1	4.84
6037189300	20.97	39.96	35-40%	Los Angeles	3117	14.73	62.56	22.71	6.54	77.67	2.98	0	11.2	1.6
6037189400	9.51	11.71	10-15%	Los Angeles	3164	10.18	75.92	13.91	7.81	75.54	5.94	0	4.39	6.32
6037189500	25.61	50.15	50-55%	Los Angeles	4180	3.28	85.22	11.51	17.49	70.55	1.58	0	6.67	3.71
6037189600	24.53	47.82	45-50%	Los Angeles	3939	3.78	86.82	9.39	14.75	71.44	3.07	0.36	4.93	5.46
6037189701	20.48	38.74	35-40%	Los Angeles	3228	3.84	81.16	14.99	10.04	71.25	5.33	0	9.76	3.62
6037189702	21.66	41.43	40-45%	Los Angeles	2201	5.13	76.74	18.13	8.59	78.96	6.04	0	2	4.41
6037189800	27.76	54.44	50-55%	Los Angeles	3833	6.21	77.85	15.94	15.24	71.51	5.5	0	2.32	5.43
6037189902	32.80	63.68	60-65%	Los Angeles	5371	0.73	91.04	8.23	9.66	71.33	2.55	0	14.97	1.49
6037189903	31.19	61.02	60-65%	Los Angeles	2089	0.96	85.69	13.36	14.94	70.8	4.55	0	7.99	1.72
6037189904	25.63	50.20	50-55%	Los Angeles	2435	3.74	87.76	8.5	18.6	62.05	8.71	0	4.93	5.71
6037189905	23.06	44.67	40-45%	Los Angeles	2432	2.55	78.21	19.24	11.06	78	4.69	0	4.89	1.36
6037190100	43.06	79.59	75-80%	Los Angeles	4453	1.93	90.77	7.3	23.22	50.3	8.17	0.43	13.09	4.78
6037190201	48.37	86.02	85-90%	Los Angeles	2632	2.39	84.27	13.34	37.84	43.58	8.74	1.41	3.69	4.75
6037190202	35.53	68.43	65-70%	Los Angeles	3225	2.51	81.15	16.34	21.15	46.76	12.53	0	9.86	9.71
6037190301	33.57	65.12	65-70%	Los Angeles	5569	2.73	79.17	18.1	22.09	49.94	11.15	0.48	11.4	4.94
6037190401	41.91	77.91	75-80%	Los Angeles	2977	2.92	87.5	9.57	26.81	56.8	0.74	0	11.59	4.06
6037190402	35.55	68.49	65-70%	Los Angeles	2372	5.27	80.02	14.71	14.97	60.67	5.78	0	16.86	1.73
6037190510	46.19	83.47	80-85%	Los Angeles	4051	9.21	83.12	7.68	39.72	35.72	6.2	0	16.67	1.7
6037190520	50.84	88.70	85-90%	Los Angeles	3979	10.73	74.67	14.6	42.98	32.04	2.16	0	21.64	1.18
6037190700	39.91	74.85	70-75%	Los Angeles	2685	3.72	77.99	18.29	22.5	55.72	5.81	0.3	6.89	8.79
6037190801	58.12	94.57	90-95%	Los Angeles	2682	3.95	79.75	16.29	43.55	35.42	10.4	0.6	8.17	1.86
6037190802	53.74	91.48	90-95%	Los Angeles	2982	4.49	86.69	8.82	44.53	30.89	8.18	0	5.33	11.07
6037190901	53.85	91.52	90-95%	Los Angeles	4587	11.25	80.44	8.31	77.79	9.31	6.89	0	3.55	2.46
6037190902	39.66	74.38	70-75%	Los Angeles	3518	8.87	81.1	10.03	57.36	31.27	5.34	0	3.27	2.76
6037191000	41.20	76.94	75-80%	Los Angeles	4454	4.42	90.88	4.69	38.37	40.53	10.78	0	7.41	2.92
6037191110	37.96	72.06	70-75%	Los Angeles	3478	4.4	74.35	21.25	28.75	54.51	2.96	0	11.44	2.33
6037191120	49.72	87.58	85-90%	Los Angeles	3900	8.05	73.33	18.62	46.87	32.21	1.44	0.87	17.64	0.97
6037191201	42.80	79.20	75-80%	Los Angeles	4414	5.01	72.56	22.43	31.29	47.73	2.49	0	15.11	3.38
6037191203	49.27	87.14	85-90%	Los Angeles	2383	6.59	77.05	16.37	43.18	21.7	4.24	0	28.75	2.14
6037191204	46.25	83.55	80-85%	Los Angeles	2033	13.33	73.68	12.99	47.71	30	1.62	0	19.53	1.13
6037191301	48.57	86.21	85-90%	Los Angeles	2224	9.85	77.47	12.68	57.28	19.06	5.13	0	18.08	0.45
6037191302	44.64	81.54	80-85%	Los Angeles	1947	7.76	82.9	9.35	52.18	26.25	1.03	0	18.7	1.85
6037191410	49.33	87.20	85-90%	Los Angeles	4646	9.62	82.01	8.37	59.62	16.75	6.46	0	16.14	1.03
6037191420	39.58	74.26	70-75%	Los Angeles	3096	8.59	84.88	6.52	62.6	19.74	1.13	0	13.92	2.62
6037191500	59.60	95.49	95-100% (highest scores)	Los Angeles	5931	8.3	78.22	13.49	60.01	14.97	0.83	0.19	21.87	2.14
6037191610	51.68	89.69	85-90%	Los Angeles	4237	12.86	78.29	8.85	57.4	19.49	5.85	0	16	1.25
6037191620	58.63	94.84	90-95%	Los Angeles	2532	5.06	74.68	20.26	63.31	16.31	9.28	0	11.1	0
6037191710	37.20	70.80	70-75%	Los Angeles	2937	10.15	76.88	12.97	64.73	19.92	5.82	0	6.98	2.55
6037191720	51.64	89.59	85-90%	Los Angeles	3224	14.33	76.74	8.93	70.56	15.11	4.71	0	8.31	1.3
6037191810	59.33	95.25	95-100% (highest scores)	Los Angeles	3367	9.56	83.9	6.53	67.69	22.45	6.24	0	1.19	2.44
6037191820	39.37	73.89	70-75%	Los Angeles	3176	8.19	83.15	8.66	42.41	38.92	7.97	0.31	5.54	4.85
6037191901	29.76	58.19	55-60%	Los Angeles	3060	3.82	88.59	7.58	26.57	56.57	7.65	0	4.8	4.41
6037191902	22.62	43.56	40-45%	Los Angeles	2788	6.92	84.86	8.21	9.15	78.91	0.65	0.04	6.42	4.84
6037192001	28.05	55.12	55-60%	Los Angeles	2370	6.5	75.02	18.48	9.11	71.35	6.58	1.18	8.86	2.91
6037192002	24.36	47.52	45-50%	Los Angeles	2597	5.93	82.21	11.86	7.05	72.28	2.77	0	8.01	9.9
6037192300	23.73	46.00	45-50%	Los Angeles	2463	6.74	76.41	16.85	11.04	61.06	1.1	0	18.72	8.08
6037192410	27.28	53.56	50-55%	Los Angeles	3700	5.59	80.59	13.81	21.08	45.46	4.54	0	22.49	6.43
6037192420	39.67	74.43	70-75%	Los Angeles	4280	15.21	75.02	9.77	50.47	12.31	6.12	0	27.9	3.2
6037192510	45.98	83.25	80-85%	Los Angeles	3840	12.37	75.34	12.29	52.32	6.02	0.36	0	38.88	2.42
6037192520	39.92	74.87	70-75%	Los Angeles	5269	16.49	74.76	8.75	76.9	5.73	1.01	0	15.92	0.44
6037192610	52.36	90.39	90-95%	Los Angeles	3703	13.96	72.94	13.1	69.46	14.88	3.83	0	9.75	2.08
6037192620	57.13	93.96	90-95%	Los Angeles	3542	13.78	78.77	7.45	71.15	4.09	1.19	0	22.78	0.79
6037192700	47.83	85.29	85-90%	Los Angeles	3449	10.21	80.11	9.68	62.22	11.92	1.91	0	18.44	5.51
6037194101	14.97	25.49	25-30%	Los Angeles	3277	4.67	84.19	11.14	7.6	70	10.56	0	5.77	6.07

6037194102	12.79	19.91	15-20%	Los Angeles	3189	8.94	69.18	21.89	8.15	74.47	6.9	0	6.59	3.89
6037194200	11.56	16.74	15-20%	Los Angeles	3524	9.73	77.24	13.02	4.85	75	2.89	0.54	3.63	13.08
6037194300	6.19	5.11	5-10%	Los Angeles	3262	8.49	75.17	16.34	15.79	75.51	2.54	0	3.62	2.54
6037194401	13.70	22.25	20-25%	Los Angeles	2391	3.3	83.27	13.43	16.94	64.32	7.53	0.46	6.23	4.52
6037194402	17.86	32.40	30-35%	Los Angeles	3579	4.02	80.44	15.54	2.35	84.86	0.61	0	10.42	1.76
6037194500	20.34	38.36	35-40%	Los Angeles	2019	8.92	72.66	18.42	6.59	79.1	4.66	0	7.03	2.63
6037195100	17.38	31.23	30-35%	Los Angeles	4978	9.8	74.85	15.35	18.22	59.74	2.47	0.48	13.9	5.18
6037195201	26.59	52.19	50-55%	Los Angeles	3128	8.22	79.35	12.44	20.72	65.73	0.67	0	10.87	2.01
6037195202	24.75	48.23	45-50%	Los Angeles	3304	9.5	80.54	9.96	9.41	72.19	1.36	0	12.41	4.63
6037195300	33.50	64.95	60-65%	Los Angeles	3089	6.7	83.88	9.42	30.33	56.2	1.55	0	9.55	2.36
6037195400	23.33	45.22	45-50%	Los Angeles	4451	5.14	81.22	13.64	24.15	60.73	1.42	0	10.72	2.99
6037195500	31.33	61.23	60-65%	Los Angeles	5548	6.98	79.51	13.52	31.67	44.05	1.55	0	19.5	3.23
6037195600	46.87	84.27	80-85%	Los Angeles	2948	8.04	80.5	11.47	48	32.87	0.85	0	14.04	4.24
6037195710	56.36	93.49	90-95%	Los Angeles	4487	9.81	80.68	9.52	64.56	17.78	4.08	0	11.27	2.3
6037195720	54.38	92.02	90-95%	Los Angeles	2000	8.9	73	18.1	63.1	20.45	0.65	0	11.5	4.3
6037195802	62.18	96.58	95-100% (highest scores)	Los Angeles	2691	10.93	76.25	12.82	59.31	14.75	2.56	0.41	21.78	1.19
6037195803	44.71	81.64	80-85%	Los Angeles	2634	8.09	82.61	9.3	36.79	38.72	3.64	0.23	15.49	5.13
6037195804	45.03	82.01	80-85%	Los Angeles	2533	10.5	76.19	13.3	43.07	34.86	5.84	0	12.2	4.03
6037195901	34.61	66.93	65-70%	Los Angeles	2237	5.23	83.01	11.76	36.12	44.12	1.88	0.54	16.54	0.8
6037195902	34.29	66.36	65-70%	Los Angeles	1864	6.49	86.43	7.08	25.21	54.61	2.41	0	13.47	4.29
6037195903	35.34	68.03	65-70%	Los Angeles	2008	6.47	83.72	9.81	47.41	30.23	0	0.25	16.24	5.88
6037197200	40.28	75.45	75-80%	Los Angeles	3909	9.93	74.26	15.81	53.75	10.85	3.27	0.38	30.62	1.13
6037197300	41.33	77.13	75-80%	Los Angeles	4052	4.27	84.18	11.55	32.85	44.37	3.38	0	16.61	2.79
6037197410	34.83	67.31	65-70%	Los Angeles	4331	10.78	77.26	11.96	34.29	47.52	2.17	0.55	10.97	4.5
6037197420	48.28	85.87	85-90%	Los Angeles	3564	8.08	81.14	10.77	50	35.41	2.55	0.84	8.95	2.24
6037197500	48.40	86.04	85-90%	Los Angeles	3914	7.46	83.55	8.99	43.82	32.83	3.7	0	17.45	2.2
6037197600	37.91	71.95	70-75%	Los Angeles	2166	7.53	83.1	9.37	43.95	32.83	0.32	0.74	16.99	5.17
6037197700	53.44	91.29	90-95%	Los Angeles	5332	10.09	76.13	13.78	25.26	22.73	3	2.21	42.72	4.07
6037199000	66.95	98.40	95-100% (highest scores)	Los Angeles	5391	13.47	74.87	11.67	66.54	5.27	1.08	0	26.06	1.06
6037199110	39.63	74.34	70-75%	Los Angeles	2705	13.09	70.5	16.41	88.47	6.21	0.37	0	4.77	0.18
6037199120	46.45	83.80	80-85%	Los Angeles	4511	10.84	74.31	14.85	73.91	3.01	2.19	0	19.4	1.49
6037199201	62.26	96.62	95-100% (highest scores)	Los Angeles	3660	11.99	77.98	10.03	68.33	1.67	0	0	30	0
6037199202	45.21	82.22	80-85%	Los Angeles	3155	9.38	78.35	12.27	74.93	10.68	1.01	0	11.95	1.43
6037199300	45.37	82.35	80-85%	Los Angeles	4202	6.35	78.91	14.73	59.16	25.99	1.4	0.5	12.23	0.71
6037199400	53.97	91.60	90-95%	Los Angeles	4759	9.14	79.64	11.22	70.43	3.87	4.41	0	19.06	2.23
6037199700	63.82	97.40	95-100% (highest scores)	Los Angeles	3063	5.88	78.13	16	65.36	17.66	0.69	0	15.58	0.72
6037199800	57.56	94.24	90-95%	Los Angeles	5828	14.34	70.97	14.69	62.3	1.3	0.02	0	36.38	0
6037199900	63.38	97.25	95-100% (highest scores)	Los Angeles	2692	14	71.25	14.75	82.39	1.89	1.56	0	14.15	0
6037201110	32.10	62.61	60-65%	Los Angeles	2147	7.5	76.85	15.65	76.01	10.81	0.65	0	12.53	0
6037201120	37.78	71.71	70-75%	Los Angeles	4144	17.08	71.31	11.61	80.28	8.74	1.3	0	7.99	1.69
6037201200	38.25	72.52	70-75%	Los Angeles	2893	15.21	73.28	11.51	81.44	7.16	0	0	10.75	0.66
6037201301	42.53	78.71	75-80%	Los Angeles	4498	14.98	70.83	14.18	76.88	5	2.27	0	15.78	0.07
6037201302	16.44	28.87	25-30%	Los Angeles	4341	10.23	73.19	16.59	26.17	20.96	5.53	0	42.04	5.3
6037201401	43.75	80.45	80-85%	Los Angeles	4693	10.53	77.26	12.21	75.64	6.93	1	3.24	10.01	3.17
6037201402	52.16	90.22	90-95%	Los Angeles	4995	8.91	70.25	20.84	74.37	3.8	0.84	0	18.98	2
6037201501	49.23	87.09	85-90%	Los Angeles	5367	13.71	72.87	13.42	82.77	9.35	1.02	0	6.34	0.52
6037201503	36.99	70.56	70-75%	Los Angeles	3364	13.73	75.18	11.09	86.47	5.29	1.07	0	7.16	0
6037201504	37.74	71.66	70-75%	Los Angeles	2302	13.47	70.55	15.99	79.41	10.51	1	0	5.43	3.65
6037201601	46.96	84.37	80-85%	Los Angeles	2323	7.28	77.7	15.02	79.77	4.69	2.54	0	9.56	3.44
6037201602	44.40	81.33	80-85%	Los Angeles	2960	10	73.95	16.05	83.61	3.48	0.1	0.84	11.15	0.81
6037201700	53.28	91.10	90-95%	Los Angeles	5514	9.87	82.54	7.6	63.64	14.24	5.44	0	14.09	2.59
6037203100	65.99	98.08	95-100% (highest scores)	Los Angeles	4498	15.56	74.7	9.74	94.73	0.89	1.29	0	2.11	0.98
6037203200	49.66	87.47	85-90%	Los Angeles	5695	20.12	71.89	7.99	94.94	2.99	0.93	0.19	0.37	0.58
6037203300	77.35	99.87	95-100% (highest scores)	Los Angeles	2000	7.7	84.5	7.8	75.55	2.85	10.45	0	6.95	4.2
6037203500	73.09	99.47	95-100% (highest scores)	Los Angeles	2907	11.66	75.37	12.97	77.23	4.88	3.27	0	14.62	0
6037203600	57.90	94.49	90-95%	Los Angeles	5276	13.59	77.69	8.72	95.96	1.71	0.91	0.36	1.06	0
6037203710	35.06	67.66	65-70%	Los Angeles	3270	16.54	73.76	9.69	97.71	1.1	0.52	0	0.67	0
6037203720	45.81	83.03	80-85%	Los Angeles	4072	16.55	75.42	8.03	97.74	1.52	0	0	0.54	0.2

6037203800	33.37	64.70	60-65%	Los Angeles	4829	18.08	70.82	11.1	97.12	0.97	0.21	0	1.57	0.12
6037203900	45.27	82.27	80-85%	Los Angeles	3353	13.39	75.84	10.77	97.14	2.09	0.78	0	0	0
6037204110	37.19	70.79	70-75%	Los Angeles	3286	11.96	77.69	10.35	96.38	3.62	0	0	0	0
6037204120	38.69	73.11	70-75%	Los Angeles	2971	14.91	72.16	12.92	93.44	3.06	1.11	0.34	0.84	1.21
6037204200	49.12	86.88	85-90%	Los Angeles	3657	15.5	77.74	6.75	96.91	1.04	0.33	0	1.72	0
6037204300	56.77	93.76	90-95%	Los Angeles	5445	15.54	72.05	12.42	95.56	2.52	0.4	0	1.38	0.15
6037204410	55.75	93.07	90-95%	Los Angeles	2575	10.83	75.65	13.51	96.47	1.36	0.19	0	1.98	0
6037204420	62.08	96.53	95-100% (highest scores)	Los Angeles	3154	14.39	79.26	6.34	90.77	1.24	4.82	0	2.54	0.63
6037204600	68.07	98.61	95-100% (highest scores)	Los Angeles	4080	9.9	77.92	12.18	91.08	3.95	2.23	0	2.13	0.61
6037204700	68.92	98.87	95-100% (highest scores)	Los Angeles	5510	16.64	70.98	12.38	95.92	1.27	1.07	0	1.14	0.6
6037204810	65.82	98.06	95-100% (highest scores)	Los Angeles	5277	15.2	75.36	9.44	96.65	0	2.2	0.17	0.53	0.45
6037204820	68.04	98.60	95-100% (highest scores)	Los Angeles	2241	12.41	75.23	12.36	94.91	2.59	2.28	0	0.22	0
6037204910	64.92	97.81	95-100% (highest scores)	Los Angeles	3341	12.03	75.79	12.18	96.17	2.48	0.87	0	0.24	0.24
6037204920	82.39	99.97	95-100% (highest scores)	Los Angeles	2751	13.34	72.59	14.07	97.27	1.71	0.84	0	0	0.18
6037205110	70.13	99.10	95-100% (highest scores)	Los Angeles	3904	18.8	77.05	4.15	95.8	1.51	0.46	0	2.23	0
6037205120	75.72	99.75	95-100% (highest scores)	Los Angeles	3548	15.14	76.13	8.74	96.25	0.68	2.03	0	1.04	0
6037206010	63.58	97.30	95-100% (highest scores)	Los Angeles	4121	9.08	74.47	16.45	53.92	7.69	1.09	0	36.86	0.44
6037206020	28.03	55.07	55-60%	Los Angeles	8947	0.07	99.11	0.83	43.19	18.52	30.99	0.57	4.22	2.51
6037206031	44.19	81.09	80-85%	Los Angeles	4131	4.99	90.9	4.12	14.48	40.91	5.42	0.29	32.78	6.12
6037206032	73.31	99.50	95-100% (highest scores)	Los Angeles	5687	14.16	69.74	16.11	74.73	6.37	2.2	0.81	15.72	0.18
6037206050	75.99	99.76	95-100% (highest scores)	Los Angeles	2031	8.91	63.66	27.42	79.62	6.35	4.23	0.25	7.78	1.77
6037206200	66.35	98.16	95-100% (highest scores)	Los Angeles	4001	2.47	71.48	26.04	16.97	15	18.35	0.07	45.91	3.7
6037206300	59.69	95.52	95-100% (highest scores)	Los Angeles	6103	1.23	87.71	11.06	15.65	25.82	50.75	1.92	2.41	3.46
6037207101	45.58	82.70	80-85%	Los Angeles	3717	11.33	71.08	17.59	14.21	14.85	13.4	0	52.06	5.49
6037207102	59.88	95.64	95-100% (highest scores)	Los Angeles	2926	4.31	67.77	27.92	22.8	8.48	7.52	2.53	57.93	0.75
6037207103	60.63	96.09	95-100% (highest scores)	Los Angeles	2393	8.02	65.94	26.03	7.52	7.56	2.38	0.21	80.99	1.34
6037207301	52.01	90.05	90-95%	Los Angeles	4911	2.95	80.02	17.02	18.92	38.65	19.53	0	14.62	8.29
6037207302	55.97	93.23	90-95%	Los Angeles	4806	1.87	91.55	6.58	18.16	38.24	20.45	0.75	14.86	7.53
6037207400	51.78	89.78	85-90%	Los Angeles	1539	2.21	93.7	4.09	44.64	15.07	25.73	0.71	12.15	1.69
6037207501	34.56	66.83	65-70%	Los Angeles	2193	5.24	85.09	9.67	21.39	28.73	11.45	0	31.42	7.02
6037207502	50.20	88.06	85-90%	Los Angeles	2888	2.15	48.27	49.58	5.89	23.44	9.7	0	58.9	2.08
6037207710	34.08	66.00	65-70%	Los Angeles	4667	2.98	86.2	10.82	13.95	34.67	12.11	0	36.19	3.09
6037207900	31.50	61.50	60-65%	Los Angeles	7162	1.98	93.05	4.97	28.97	25.05	7.65	0	32.94	5.39
6037208000	69.81	99.05	95-100% (highest scores)	Los Angeles	7508	11.77	82.23	5.99	63.49	9.7	10.18	0	14.03	2.61
6037208301	48.30	85.91	85-90%	Los Angeles	2148	15.13	82.22	2.65	92.6	0.51	1.58	0.33	4	0.98
6037208302	64.72	97.71	95-100% (highest scores)	Los Angeles	5269	13.21	78.65	8.14	75.1	5.85	8.1	0	9.96	0.99
6037208401	46.70	84.08	80-85%	Los Angeles	4765	14.35	71.19	14.46	70.87	2.31	1.57	0	25.25	0
6037208402	58.18	94.59	90-95%	Los Angeles	2896	12.05	79.97	7.98	70.2	9.15	1.45	0	17.75	1.45
6037208501	37.42	71.28	70-75%	Los Angeles	2267	7.81	77.72	14.47	40.41	9.66	1.28	0.71	45.66	2.29
6037208502	51.41	89.33	85-90%	Los Angeles	4364	11.07	79.51	9.42	82.01	4.22	2.13	0.62	10.31	0.71
6037208610	52.04	90.12	90-95%	Los Angeles	4351	7.75	82.03	10.23	52.13	6.46	4.62	0	35.11	1.68
6037208620	47.86	85.30	85-90%	Los Angeles	4446	13.97	74.27	11.76	50.36	7.58	7.94	0	31.35	2.77
6037208710	31.33	61.25	60-65%	Los Angeles	4858	9.55	78.3	12.14	31.82	8.65	3.5	2.18	51.15	2.7
6037208720	54.58	92.17	90-95%	Los Angeles	4319	12.11	81.57	6.32	77.63	14.89	2.78	0	4.7	0
6037208801	48.15	85.69	85-90%	Los Angeles	3027	9.65	71.32	19.03	53.32	13.12	9.32	0	21.9	2.35
6037208802	53.56	91.38	90-95%	Los Angeles	3069	12.28	74.26	13.46	57.74	13.29	3.23	0	22.81	2.93
6037208902	51.89	89.88	85-90%	Los Angeles	2692	12.44	83.1	4.46	90.6	1.75	2.71	0	4.94	0
6037208903	52.41	90.43	90-95%	Los Angeles	4345	14.8	77.38	7.83	82.69	4.72	6.79	0.14	3.18	2.49
6037208904	47.60	85.02	85-90%	Los Angeles	3978	15.13	71.52	13.35	88.59	2.59	1.51	0	7.32	0
6037209102	59.43	95.31	95-100% (highest scores)	Los Angeles	5950	16.82	75.24	7.93	71.43	4.82	10.08	0	12.39	1.28
6037209103	56.33	93.43	90-95%	Los Angeles	3679	20.28	73.77	5.95	91.82	1.74	5.11	0	1.01	0.33
6037209104	55.73	93.05	90-95%	Los Angeles	2560	14.8	79.38	5.82	81.21	4.45	9.45	0	3.83	1.05
6037209200	50.50	88.39	85-90%	Los Angeles	4545	7.02	87.04	5.94	34.35	22.73	7.81	0	29.46	5.65
6037209300	57.44	94.11	90-95%	Los Angeles	4885	11.89	81.37	6.73	73.86	6.96	6.18	0	11.14	1.86
6037209401	52.03	90.10	90-95%	Los Angeles	4472	13.15	75.56	11.29	72.14	6.84	6.64	0	13.28	1.1
6037209402	54.24	91.84	90-95%	Los Angeles	3963	15.62	78.65	5.73	89.05	7.01	0.56	0	3.38	0
6037209403	52.15	90.20	90-95%	Los Angeles	4148	8.53	76.3	15.16	70.83	5.64	4.82	0	18.59	0.12
6037209510	44.88	81.90	80-85%	Los Angeles	3076	13.26	76.3	10.44	68.5	3.25	1.59	0	23.34	3.32

6037209520	54.91	92.49	90-95%	Los Angeles	2797	17.91	74.22	7.87	88.52	2.9	2.15	0.75	5.68	0
6037209810	51.53	89.51	85-90%	Los Angeles	2594	10.45	69.01	20.55	71.05	11.76	5.05	0	11.76	0.39
6037209820	54.94	92.51	90-95%	Los Angeles	3073	23.2	72.08	4.72	91.25	2.47	2.02	0	3.81	0.46
6037210010	51.73	89.73	85-90%	Los Angeles	3561	12.22	73.35	14.43	85.65	1.88	1.35	0	11.12	0
6037211000	19.80	36.93	35-40%	Los Angeles	5124	13.56	72.31	14.13	8.27	54.02	3.24	0.04	28.36	6.07
6037211120	40.60	76.05	75-80%	Los Angeles	5635	8.13	81.85	10.03	28.71	6.03	4.01	0.16	60.66	0.43
6037211121	28.86	56.69	55-60%	Los Angeles	2253	8.52	80.47	11.01	35.15	15.53	7.01	0	37.64	4.66
6037211122	42.00	78.01	75-80%	Los Angeles	3163	11.51	81.35	7.15	31.74	21.15	5.47	0.09	40.44	1.11
6037211201	43.18	79.77	75-80%	Los Angeles	2562	9.91	80.56	9.52	68.03	8.12	4.92	0	17.29	1.64
6037211202	48.06	85.59	85-90%	Los Angeles	2239	10.54	79.14	10.32	69.45	8.98	4.42	0	15.99	1.16
6037211310	45.89	83.07	80-85%	Los Angeles	3873	12.6	78.65	8.75	74.15	6.51	2.48	0	16.42	0.44
6037211320	45.97	83.23	80-85%	Los Angeles	3337	16.48	76.03	7.49	61.22	13.1	4.61	0.51	20.56	0
6037211410	38.36	72.74	70-75%	Los Angeles	2736	10.09	80.45	9.47	31.29	12.24	1.5	0.88	50.29	3.8
6037211420	35.03	67.62	65-70%	Los Angeles	3573	11	80.49	8.51	51.02	13.6	8.17	0	25.72	1.48
6037211500	30.66	60.01	60-65%	Los Angeles	4175	7.62	77.68	14.71	21.41	26.54	4.57	0	43.23	4.24
6037211701	26.77	52.55	50-55%	Los Angeles	2596	8.47	73.92	17.6	7.74	35.29	5.7	0	45.03	6.24
6037211703	39.17	73.71	70-75%	Los Angeles	4841	9.05	81.35	9.61	42.74	11.38	7.29	0	36.44	2.15
6037211704	29.78	58.27	55-60%	Los Angeles	2796	5.87	74.89	19.24	20.17	16.27	8.4	0	52.54	2.61
6037211802	34.61	66.96	65-70%	Los Angeles	4682	14.03	70.74	15.23	30.07	13.48	6	0.26	49.16	1.03
6037211803	30.52	59.68	55-60%	Los Angeles	3701	10.83	84.46	4.7	20.37	5.16	1.73	0	69.98	2.76
6037211804	40.95	76.59	75-80%	Los Angeles	3221	6.21	78.39	15.4	12.2	6.55	2.39	2.2	71.34	5.31
6037211910	38.74	73.15	70-75%	Los Angeles	4371	11.85	82.13	6.02	59.03	8.76	3.68	0	26.4	2.13
6037211921	46.60	83.95	80-85%	Los Angeles	2521	12.77	79.93	7.3	42.13	8.73	3.53	0.48	37.72	7.42
6037211922	43.81	80.55	80-85%	Los Angeles	3269	16.64	78.8	4.56	41.05	5.75	7.07	1.25	44.64	0.24
6037212101	24.78	48.27	45-50%	Los Angeles	3187	8.66	80.36	10.98	25.2	13.59	19.01	0	37.78	4.42
6037212102	38.03	72.23	70-75%	Los Angeles	2291	11.13	61.76	27.11	27.41	11.74	15.89	0.83	42.99	1.13
6037212202	39.40	73.95	70-75%	Los Angeles	3424	12.79	78.42	8.79	69.86	4.56	4.7	0	20.88	0
6037212203	48.33	85.94	85-90%	Los Angeles	2914	6.97	74.33	18.7	60.64	5.25	5.7	0	25.36	3.05
6037212204	42.71	78.98	75-80%	Los Angeles	3584	15.93	73.97	10.1	68.11	4.6	8.51	0.47	17.58	0.73
6037212303	39.78	74.65	70-75%	Los Angeles	3837	14.28	80.61	5.11	63.49	5.06	6.98	0.44	21.66	2.37
6037212304	53.66	91.43	90-95%	Los Angeles	1832	12.06	77.89	10.04	62.45	18.01	4.59	0.38	13.86	0.71
6037212305	35.39	68.14	65-70%	Los Angeles	3025	15.83	77.92	6.25	70.08	4.3	3.27	1.45	19.57	1.32
6037212306	36.51	69.88	65-70%	Los Angeles	3413	16.67	73.86	9.46	55.9	3.66	1.03	1.03	38.21	0.18
6037212410	34.29	66.38	65-70%	Los Angeles	4318	10.61	81.17	8.22	45.3	6.81	3.89	0	40.83	3.17
6037212420	32.17	62.72	60-65%	Los Angeles	3517	14.36	75.23	10.41	54.17	5.17	6.82	1.17	29.71	2.96
6037212501	26.17	51.27	50-55%	Los Angeles	1940	8.35	81.08	10.57	53.92	17.42	4.59	0.36	22.27	1.44
6037212502	25.89	50.77	50-55%	Los Angeles	2810	4.27	82.06	13.67	33.7	12.88	6.69	0	42.81	3.91
6037212610	33.07	64.15	60-65%	Los Angeles	4447	10.55	76.84	12.62	36.11	8.05	2.59	0	52.44	0.81
6037212620	28.23	55.37	55-60%	Los Angeles	4087	10.74	78.52	10.74	44.16	9.32	2.76	0	40.05	3.69
6037212701	40.60	76.06	75-80%	Los Angeles	2276	7.73	67.79	24.47	22.23	6.94	10.06	0	59.49	1.27
6037212702	26.92	52.89	50-55%	Los Angeles	3632	8.67	71.17	20.15	15.61	22.8	8.51	0.14	48.29	4.65
6037212800	42.94	79.41	75-80%	Los Angeles	3543	8.47	73.78	17.75	32.03	19.45	14.11	0.34	27.29	6.77
6037212900	41.70	77.63	75-80%	Los Angeles	4067	13.2	76.42	10.38	51.34	9.59	11.29	0.47	25.55	1.77
6037213100	37.22	70.81	70-75%	Los Angeles	3014	13.34	72.36	14.3	32.85	7.6	11.48	0	47.88	0.2
6037213201	45.58	82.69	80-85%	Los Angeles	3932	11.06	73.42	15.51	43.74	5.14	1.2	0	49.21	0.71
6037213202	45.84	83.04	80-85%	Los Angeles	3942	11.21	75.85	12.94	68.34	3.27	0.66	0	25.77	1.95
6037213310	47.15	84.62	80-85%	Los Angeles	3015	11.08	77.88	11.04	64.34	2.02	2.22	0.76	30.65	0
6037213320	45.91	83.11	80-85%	Los Angeles	2469	11.42	72.46	16.12	64.56	1.34	2.51	0	31.59	0
6037213401	40.55	75.93	75-80%	Los Angeles	4859	12.55	79.91	7.53	70.67	5.52	2.72	0	20.91	0.19
6037213402	44.17	81.04	80-85%	Los Angeles	4857	14.62	76.36	9.02	68.25	5	5.21	0	20.71	0.82
6037214000	26.65	52.33	50-55%	Los Angeles	4277	18.45	65.79	15.76	7.32	85.95	0.35	0	3.09	3.3
6037214100	17.81	32.27	30-35%	Los Angeles	3668	11.45	74.54	14.01	8.83	84.46	1.61	0	3.85	1.25
6037214400	23.12	44.82	40-45%	Los Angeles	2916	8.68	86.83	4.49	11.39	79.84	2.5	0	5.21	1.06
6037214501	28.35	55.61	55-60%	Los Angeles	2702	13.84	76.17	9.99	11.1	53.22	7.4	0	23.06	5.22
6037214502	26.80	52.61	50-55%	Los Angeles	5285	11.3	83.2	5.51	7.47	47.64	12.03	0	28.36	4.48
6037214503	29.92	58.51	55-60%	Los Angeles	3422	12.3	75.98	11.72	5.03	45.41	8.3	0.03	31.97	9.26
6037214600	16.14	28.29	25-30%	Los Angeles	2383	6.67	76.92	16.41	14.44	73.86	0.8	0	4.53	6.38
6037214700	22.07	42.28	40-45%	Los Angeles	2414	7.25	67.98	24.77	11.43	70.34	7.04	0.46	7.04	3.69

6037214800	23.82	46.29	45-50%	Los Angeles	2813	8.46	77.21	14.33	6.19	78.63	4.98	0.28	5.83	4.09
6037214901	22.96	44.39	40-45%	Los Angeles	3250	2.92	82.52	14.55	10.43	68.06	1.91	1.88	11.48	6.25
6037214902	23.90	46.52	45-50%	Los Angeles	2550	8.82	72.16	19.02	4.75	68.55	4.94	0	13.96	7.8
6037215101	24.08	46.90	45-50%	Los Angeles	3015	6.63	87.99	5.37	11.54	57.98	10.02	0	14.85	5.61
6037215102	21.85	41.89	40-45%	Los Angeles	3059	4.77	89.67	5.56	20.01	63.45	2.48	0	10.49	3.56
6037216100	21.08	40.13	40-45%	Los Angeles	2151	5.86	74.9	19.25	15.06	48.77	13.67	0	19.2	3.3
6037216200	30.30	59.28	55-60%	Los Angeles	5778	9.21	80.56	10.23	18.19	38.56	17.79	0	17.68	7.77
6037216300	17.60	31.85	30-35%	Los Angeles	4367	6.96	79.99	13.05	12.78	59.74	8.91	0.39	13.69	4.49
6037216401	23.66	45.78	45-50%	Los Angeles	3772	8.67	78.58	12.75	6.47	77.86	6.68	0	6.55	2.44
6037216402	22.51	43.26	40-45%	Los Angeles	2521	5.87	72.71	21.42	7.34	69.89	1.35	0.32	14.16	6.94
6037216700	26.89	52.84	50-55%	Los Angeles	3835	8.74	76.92	14.34	22.32	33.72	28.74	0	8.71	6.52
6037216800	26.01	51.00	50-55%	Los Angeles	3203	13.8	73.87	12.33	19.86	57.76	7.02	0	8.61	6.74
6037216900	34.43	66.57	65-70%	Los Angeles	4886	7	78.45	14.55	16.84	44.11	28.57	0.16	6.3	4.01
6037217001	17.33	31.13	30-35%	Los Angeles	2724	20.56	67.25	12.19	1.98	85.9	2.46	0	3.27	6.39
6037217002	23.77	46.17	45-50%	Los Angeles	4639	11.51	79.05	9.44	12.03	75.43	1.57	0	7.35	3.62
6037217100	38.26	72.54	70-75%	Los Angeles	6219	8.41	79.22	12.37	37.45	27.88	21.18	0	4.07	9.42
6037217200	46.25	83.54	80-85%	Los Angeles	4156	11.55	77.98	10.47	43.26	24.59	22.59	0.87	5.37	3.32
6037218110	41.21	76.95	75-80%	Los Angeles	3195	13.15	72.86	13.99	57.75	6.67	18.65	0.53	15.15	1.25
6037218120	49.10	86.86	85-90%	Los Angeles	4638	17.34	73.65	9.01	71.71	2.2	11.08	0	12.9	2.11
6037218210	49.94	87.81	85-90%	Los Angeles	3721	12.12	79.15	8.73	68.72	11.74	14.38	0	5.16	0
6037218220	42.34	78.49	75-80%	Los Angeles	3859	8.68	78.34	12.98	51	18.06	23.32	0	6.69	0.93
6037218300	42.35	78.50	75-80%	Los Angeles	5290	11.76	76.96	11.29	51.74	8.24	26.48	0	4.84	8.7
6037218400	61.89	96.51	95-100% (highest scores)	Los Angeles	4737	14.78	77.35	7.87	62.42	13.76	18.91	0	2.74	2.15
6037218500	57.45	94.15	90-95%	Los Angeles	2641	9.24	77.89	12.87	57.14	8.44	24.54	0	4.01	5.87
6037218600	44.49	81.40	80-85%	Los Angeles	3148	9.21	79.7	11.09	56.67	10.71	25.92	0	2.41	4.29
6037218701	45.39	82.43	80-85%	Los Angeles	2324	10.89	75.95	13.17	31.41	9.29	36.19	0	20.65	2.45
6037218702	55.40	92.85	90-95%	Los Angeles	2056	11.62	74.46	13.91	49.42	6.96	39.3	0	2.92	1.41
6037218800	52.49	90.51	90-95%	Los Angeles	2752	8.68	78.78	12.54	54.4	4.47	23.55	0	15.63	1.96
6037218900	55.94	93.22	90-95%	Los Angeles	6149	9.38	83.44	7.17	47.41	7.29	38.79	0	3.11	3.42
6037219010	44.16	81.03	80-85%	Los Angeles	3027	12.32	77.67	10.01	62.14	3.34	30.99	0.23	2.08	1.22
6037219020	44.37	81.30	80-85%	Los Angeles	5411	17.3	69.58	13.12	61.95	6.02	27.04	0	3.01	1.98
6037219300	57.64	94.31	90-95%	Los Angeles	4239	15.33	73.25	11.42	59.73	5.1	27.08	0	6.66	1.44
6037219500	40.75	76.27	75-80%	Los Angeles	2084	11.8	67.85	20.35	23.18	12.09	49.38	0	13.77	1.58
6037219700	54.48	92.11	90-95%	Los Angeles	4507	10.45	78.72	10.83	67.21	2.71	26.4	0	2.49	1.2
6037219800	57.46	94.16	90-95%	Los Angeles	2861	10.42	79.8	9.79	75.11	5.07	16.08	0	2.73	1.01
6037219901	69.52	98.97	95-100% (highest scores)	Los Angeles	4150	13.18	79.23	7.59	70.92	4.51	21.64	0	1.42	1.52
6037219902	72.78	99.45	95-100% (highest scores)	Los Angeles	3809	6.17	83.93	9.9	67.39	9.19	15.54	0.42	4.09	3.36
6037220000	48.77	86.47	85-90%	Los Angeles	4711	6.75	69.88	23.37	51.56	7.92	32.58	0	7.71	0.23
6037220100	60.95	96.22	95-100% (highest scores)	Los Angeles	2415	4.22	68.49	27.29	33.04	3.89	52.63	0	6.63	3.81
6037221110	49.68	87.49	85-90%	Los Angeles	3705	10.55	79.65	9.8	92.79	2.11	1.38	0	3.72	0
6037221120	43.58	80.21	80-85%	Los Angeles	3197	15.45	75.79	8.76	96.03	1.63	0.16	0	2.19	0
6037221210	39.72	74.57	70-75%	Los Angeles	3165	11.03	75.29	13.68	78.96	4.55	6.22	0	9.32	0.95
6037221220	42.61	78.86	75-80%	Los Angeles	3376	10.63	79.09	10.28	88.3	3.29	0.39	0	8.03	0
6037221302	44.59	81.51	80-85%	Los Angeles	4373	9.79	80.04	10.18	70.57	3.34	12.94	0	11.87	1.28
6037221303	42.48	78.66	75-80%	Los Angeles	2806	13.76	77.26	8.98	76.05	6.99	3.96	0	12.3	0.71
6037221304	45.06	82.05	80-85%	Los Angeles	3656	10.86	76.86	12.28	60.86	3.01	11.38	0	24.18	0.57
6037221401	62.25	96.61	95-100% (highest scores)	Los Angeles	3628	14.17	64.03	21.8	40.35	8.16	37.79	0	10.78	2.92
6037221402	50.42	88.31	85-90%	Los Angeles	2851	11.08	69.41	19.5	46.44	12.07	23.85	0	15.26	2.39
6037221500	50.09	87.99	85-90%	Los Angeles	3875	12.57	76.44	10.99	68.83	3.2	23.92	0	4.05	0
6037221601	51.08	88.94	85-90%	Los Angeles	3141	9.65	80.48	9.87	68.04	9.33	14.45	0	5.67	2.52
6037221602	45.38	82.38	80-85%	Los Angeles	3030	14.62	75.21	10.17	84.09	1.78	5.02	0	8.38	0.73
6037221710	45.95	83.16	80-85%	Los Angeles	2833	6.85	77.3	15.85	66.85	6.71	4.69	0	21.39	0.35
6037221810	49.00	86.72	85-90%	Los Angeles	2892	5.26	88.17	6.57	51.9	13.17	9.51	0	23.31	2.11
6037221820	43.08	79.63	75-80%	Los Angeles	2363	0.93	95.81	3.26	16.93	34.45	9.78	0.38	35.38	3.09
6037221900	40.81	76.32	75-80%	Los Angeles	4248	4.57	89.9	5.53	26.44	26.29	9.11	0.4	29.99	7.77
6037222001	45.61	82.74	80-85%	Los Angeles	3142	10.98	77.82	11.2	61.9	11.68	24.19	0	0.41	1.81
6037222002	43.65	80.32	80-85%	Los Angeles	5243	10.91	81.25	7.84	74.42	2.54	22.16	0	0.74	0.13
6037222100	40.44	75.72	75-80%	Los Angeles	4331	13.41	77.37	9.21	59.06	5.45	28.01	0	6.77	0.72

6037222200	47.34	84.85	80-85%	Los Angeles	4016	14.19	78.06	7.74	73.88	3.98	16.96	0	4.23	0.95
6037222500	34.14	66.11	65-70%	Los Angeles	5120	12.13	79.12	8.75	69.16	3.3	22.03	0	3.38	2.13
6037222600	44.96	81.96	80-85%	Los Angeles	5549	6.9	83.6	9.5	52.06	8.15	17.97	0.45	18.76	2.61
6037222700	33.78	65.51	65-70%	Los Angeles	4071	0	100	0	14.1	42.1	7.07	0	33.36	3.37
6037224010	62.73	96.96	95-100% (highest scores)	Los Angeles	2845	6.54	82.11	11.35	57.61	13.85	17.64	0	9.35	1.55
6037224020	55.39	92.84	90-95%	Los Angeles	2733	14.16	83.06	2.78	88.36	6.15	2.74	0.15	2.01	0.59
6037224200	62.51	96.82	95-100% (highest scores)	Los Angeles	2557	10.91	82.71	6.37	90.3	4.11	2.42	0.31	1.84	1.02
6037224310	40.87	76.40	75-80%	Los Angeles	2422	17.8	74.36	7.84	89.68	3.76	1.32	0	5	0.25
6037224320	50.36	88.28	85-90%	Los Angeles	2972	15.01	70.86	14.13	83.78	2.73	8.08	0.81	3.9	0.71
6037224410	46.81	84.19	80-85%	Los Angeles	3194	5.79	80.62	13.59	63.65	14.84	6.26	0	11.28	3.98
6037224420	48.02	85.49	85-90%	Los Angeles	2637	10.05	81.87	8.08	82.71	4.51	6.45	0	5.38	0.95
6037224600	60.62	96.08	95-100% (highest scores)	Los Angeles	3385	14	74.8	11.2	87.5	2.22	7.39	0	2.9	0
6037224700	44.29	81.23	80-85%	Los Angeles	6238	0.19	99.34	0.46	14.09	40.56	5.32	0.06	36.27	3.69
6037226001	76.52	99.81	95-100% (highest scores)	Los Angeles	2615	24.21	70.9	4.89	83.71	0.38	15.56	0.34	0	0
6037226002	75.55	99.72	95-100% (highest scores)	Los Angeles	1820	4.34	89.95	5.71	43.57	33.46	11.43	0	8.3	3.24
6037226410	60.48	95.99	95-100% (highest scores)	Los Angeles	3665	13.07	78.88	8.05	98.01	0.19	0.93	0	0.55	0.33
6037226420	62.38	96.67	95-100% (highest scores)	Los Angeles	5531	16.13	76.42	7.45	87.31	0.65	7.16	0	4.88	0
6037226700	59.78	95.56	95-100% (highest scores)	Los Angeles	7661	20.01	76.44	3.55	97.02	0	2.74	0	0.12	0.12
6037227010	76.65	99.82	95-100% (highest scores)	Los Angeles	5705	19.16	75.23	5.61	92.92	0.56	5.33	1.19	0	0
6037227020	64.65	97.67	95-100% (highest scores)	Los Angeles	3623	14.77	78.33	6.9	96.63	0.39	2.57	0	0.41	0
6037228100	69.26	98.92	95-100% (highest scores)	Los Angeles	5505	18.44	75.77	5.79	93.55	0	5.92	0	0.27	0.25
6037228210	60.07	95.71	95-100% (highest scores)	Los Angeles	4233	16.7	72.34	10.96	90.67	0.33	6.17	0.99	1.84	0
6037228220	52.82	90.72	90-95%	Los Angeles	4375	14.56	78.19	7.25	90.83	0.94	6.81	0.18	0	1.23
6037228310	57.61	94.30	90-95%	Los Angeles	4523	15.61	78.53	5.86	94.25	0.69	4.71	0.11	0	0.24
6037228320	53.36	91.21	90-95%	Los Angeles	3122	16.11	77.39	6.5	96.7	0	3.3	0	0	0
6037228410	59.85	95.63	95-100% (highest scores)	Los Angeles	3600	14.31	79.47	6.22	92.64	2.22	3.44	0	1.69	0
6037228420	59.04	95.11	95-100% (highest scores)	Los Angeles	3304	19.95	76.39	3.66	92.1	0.42	7.32	0	0	0.15
6037228500	56.98	93.89	90-95%	Los Angeles	4869	17.38	76.11	6.51	84.64	0	15.36	0	0	0
6037228600	54.75	92.31	90-95%	Los Angeles	5301	15	80.04	4.96	92.08	0.49	6.4	0.28	0.08	0.68
6037228710	55.05	92.57	90-95%	Los Angeles	3982	18.13	74.81	7.06	88.37	0.58	9.39	0.15	0.98	0.53
6037228720	62.38	96.68	95-100% (highest scores)	Los Angeles	4825	18.94	74.16	6.9	88.23	0.64	10.88	0	0	0.25
6037228800	65.69	98.01	95-100% (highest scores)	Los Angeles	5353	15.93	77.19	6.87	91.39	0	8.31	0	0.13	0.17
6037228900	69.56	98.98	95-100% (highest scores)	Los Angeles	2918	18.92	75.63	5.45	87.29	0.17	12.54	0	0	0
6037229100	65.14	97.88	95-100% (highest scores)	Los Angeles	5146	18.83	75.92	5.25	91.16	0.29	8.26	0	0	0.29
6037229200	55.25	92.70	90-95%	Los Angeles	5072	16.27	75.81	7.93	85.11	0.22	13.54	0	1.12	0
6037229300	60.20	95.80	95-100% (highest scores)	Los Angeles	5715	19.07	76.97	3.95	87.61	0.75	9.68	0.44	0.12	1.4
6037229410	60.13	95.76	95-100% (highest scores)	Los Angeles	3697	24.07	70.71	5.22	92.35	0.78	5.22	0	0.92	0.73
6037229420	64.86	97.77	95-100% (highest scores)	Los Angeles	4759	21.01	74.03	4.96	91.03	0.38	8.05	0	0.29	0.25
6037231100	60.76	96.18	95-100% (highest scores)	Los Angeles	3474	12.32	79.19	8.49	72.48	7.17	16.35	0	1.93	2.07
6037231210	51.06	88.93	85-90%	Los Angeles	4040	17.72	73.34	8.94	83.86	1.76	11.46	0.67	0.79	1.46
6037231220	49.99	87.87	85-90%	Los Angeles	4653	17.92	71.7	10.38	68.54	1.72	22.74	0	5.95	1.05
6037231300	42.06	78.18	75-80%	Los Angeles	5754	10.18	80.59	9.23	70.89	4.19	18.46	0	4.19	2.28
6037231400	42.58	78.77	75-80%	Los Angeles	4745	14.44	74.6	10.96	65.4	3.6	28.41	0	1.58	1.01
6037231500	48.99	86.70	85-90%	Los Angeles	5396	12.49	74.26	13.25	61.36	0.7	32.02	0	4.45	1.46
6037231600	55.65	92.98	90-95%	Los Angeles	7420	11.89	76.48	11.63	62.67	5.63	27.39	0	1.12	3.19
6037231710	57.10	93.94	90-95%	Los Angeles	4165	18.08	75.61	6.31	82.16	0.62	15.41	0.17	0	1.63
6037231720	60.11	95.74	95-100% (highest scores)	Los Angeles	4934	14.53	74.54	10.92	78.13	2.13	16.36	0	1.91	1.48
6037231800	52.43	90.46	90-95%	Los Angeles	5436	18.76	77.06	4.18	92.88	0	4.38	0	0	2.74
6037231900	55.16	92.65	90-95%	Los Angeles	6162	16.36	76.58	7.06	86.14	0.39	10.47	0.5	0.26	2.24
6037232110	53.04	90.89	90-95%	Los Angeles	3038	12.57	79.16	8.26	83.18	0.23	15.24	0.39	0.66	0.3
6037232120	63.75	97.37	95-100% (highest scores)	Los Angeles	5567	21.32	70.67	8.01	78.35	0.65	18.83	0.41	1.74	0.02
6037232200	53.55	91.36	90-95%	Los Angeles	3487	10.01	80.64	9.35	63.15	1.15	34.76	0	0.49	0.46
6037232300	49.03	86.75	85-90%	Los Angeles	6006	9.77	81.65	8.57	74.33	1.05	23.44	0	0.02	1.17
6037232400	50.69	88.58	85-90%	Los Angeles	7361	11.82	77.58	10.6	54	2.84	38.96	0	1.58	2.62
6037232500	57.99	94.52	90-95%	Los Angeles	4940	13.08	75.02	11.9	66.23	0.12	31.64	0	1.01	0.99
6037232600	47.14	84.61	80-85%	Los Angeles	6833	14.83	76.15	9.03	77.56	0.82	19.99	0.63	1	0
6037232700	62.57	96.84	95-100% (highest scores)	Los Angeles	6568	17.28	74.94	7.78	79.89	1.13	16.31	0	0.97	1.71
6037232800	63.14	97.13	95-100% (highest scores)	Los Angeles	4489	18.4	75.87	5.73	86.59	0.6	11.7	0.07	0	1.05

6037234000	34.72	67.11	65-70%	Los Angeles	5417	12.72	68.34	18.94	37.42	5.63	54.99	0	0.48	1.48
6037234200	34.24	66.30	65-70%	Los Angeles	2424	3.84	72.98	23.18	6.72	12	69.88	0	8	3.38
6037234300	38.33	72.68	70-75%	Los Angeles	3805	7.07	78.92	14.01	9.83	5.44	78.06	0	2.52	4.15
6037234501	39.14	73.68	70-75%	Los Angeles	2845	10.4	69.46	20.14	35.96	4.89	54.9	0	0.95	3.3
6037234502	42.81	79.21	75-80%	Los Angeles	3017	14.12	69.84	16.04	34.67	2.55	60.46	0	1.16	1.16
6037234600	46.27	83.57	80-85%	Los Angeles	4908	12.86	72.72	14.43	35.21	5.46	50.61	0	1.79	6.93
6037234700	46.10	83.38	80-85%	Los Angeles	3690	7.99	75.58	16.42	43.58	1.52	54.28	0	0.03	0.6
6037234800	42.91	79.35	75-80%	Los Angeles	3317	3.8	81.07	15.13	41.51	2.8	52.07	0	1.39	2.23
6037234901	55.94	93.20	90-95%	Los Angeles	3321	18.4	73.86	7.74	46.88	0.69	52.21	0	0	0.21
6037234902	55.03	92.56	90-95%	Los Angeles	4088	12.7	73.36	13.94	47.26	4.84	41.32	0.46	3.99	2.13
6037235100	39.59	74.27	70-75%	Los Angeles	4401	9.73	73.53	16.75	16.29	11.61	65.51	0	4	2.59
6037235201	39.05	73.58	70-75%	Los Angeles	2682	6.49	80.72	12.79	33.74	3.13	59.36	0	0.41	3.36
6037235202	50.51	88.41	85-90%	Los Angeles	4331	7.92	75.18	16.9	29.69	1.06	65.39	0	0.14	3.72
6037236000	35.44	68.33	65-70%	Los Angeles	4181	4.19	71.78	24.04	15.36	26.79	47	0.88	3.73	6.24
6037236100	51.79	89.80	85-90%	Los Angeles	6170	7.02	74.2	18.78	27.24	1.57	60.37	0	8.07	2.74
6037236202	50.33	88.25	85-90%	Los Angeles	5764	8.38	84.33	7.29	47.43	5.08	41	0	3.4	3.09
6037236203	41.19	76.93	75-80%	Los Angeles	3118	14.34	72.1	13.57	28.51	3.72	54.84	1.09	7.18	4.65
6037236204	44.24	81.15	80-85%	Los Angeles	3109	12.77	82.15	5.08	41.91	4.6	50.4	0.32	1.06	1.7
6037236400	34.54	66.78	65-70%	Los Angeles	4282	6.61	72.91	20.48	2.8	9.46	82.16	0.3	1.75	3.53
6037237101	57.70	94.34	90-95%	Los Angeles	4409	17.56	74.48	7.96	70.11	0.64	26.51	0	2.09	0.66
6037237102	60.89	96.19	95-100% (highest scores)	Los Angeles	3407	17.87	73.94	8.19	80.8	1.12	16.7	0	0.68	0.7
6037237201	51.67	89.65	85-90%	Los Angeles	3814	13.37	79.55	7.08	69.8	1.13	26.69	0	1.94	0.45
6037237202	64.50	97.64	95-100% (highest scores)	Los Angeles	4556	16.92	74.87	8.21	64.05	4.17	29.39	0	2.02	0.37
6037237300	49.65	87.46	85-90%	Los Angeles	5311	8.81	78.69	12.5	43.46	2.73	52.29	0.19	0.02	1.32
6037237401	51.53	89.50	85-90%	Los Angeles	4217	11.05	80.77	8.18	74.53	1.61	23.31	0	0	0.55
6037237402	43.05	79.56	75-80%	Los Angeles	3335	8.49	74.99	16.52	56.07	1.86	34.69	0	0	7.38
6037237500	50.25	88.17	85-90%	Los Angeles	2922	11.64	79.3	9.07	75.7	1.61	22.48	0	0.07	0.14
6037237600	55.18	92.66	90-95%	Los Angeles	4101	18.07	71.25	10.68	74.1	0.93	22.63	0.29	1.8	0.24
6037237710	50.94	88.79	85-90%	Los Angeles	4410	18.75	77.55	3.7	80.05	0.52	17.12	0.68	0	1.63
6037237720	49.52	87.38	85-90%	Los Angeles	3707	25.11	70.57	4.32	72.86	2.16	23.58	0.43	0	0.97
6037237800	38.32	72.64	70-75%	Los Angeles	3796	11.25	75.05	13.7	40.67	1.63	52.58	1.61	0.21	3.29
6037237900	40.46	75.78	75-80%	Los Angeles	4405	15.89	72.26	11.85	26.13	3.09	67.33	0	0	3.45
6037238000	43.55	80.18	80-85%	Los Angeles	6174	9.8	71.01	19.19	21.59	1.55	67.98	0	1.09	7.79
6037238100	51.25	89.17	85-90%	Los Angeles	5163	14.08	71.49	14.43	39.65	1.51	55.57	0	0.6	2.67
6037238200	53.98	91.63	90-95%	Los Angeles	5565	3.88	78.08	18.04	26.5	0.4	70.42	0	1.99	0.68
6037238310	56.87	93.86	90-95%	Los Angeles	5002	17.49	76.17	6.34	74.43	1.04	24.11	0	0.18	0.24
6037238320	57.57	94.28	90-95%	Los Angeles	3804	23.21	68.93	7.86	65.17	1	32.47	0	1.37	0
6037238400	46.04	83.28	80-85%	Los Angeles	4694	16.38	60.78	22.84	17.83	1.96	76.99	1	0.34	1.87
6037239201	72.93	99.46	95-100% (highest scores)	Los Angeles	3753	18.28	76.85	4.88	83.8	0.72	14.97	0.16	0	0.35
6037239202	76.24	99.77	95-100% (highest scores)	Los Angeles	5999	16.87	79.48	3.65	91.6	0.12	7.05	0.68	0	0.55
6037239310	69.57	98.99	95-100% (highest scores)	Los Angeles	4501	23.82	71.61	4.58	87.98	1.02	10.73	0	0.13	0.13
6037239320	58.48	94.74	90-95%	Los Angeles	4086	16.62	77.83	5.56	84.46	0.29	10.77	0	0.15	4.33
6037239330	71.24	99.26	95-100% (highest scores)	Los Angeles	2458	15.66	77.5	6.83	86.66	0.77	11.55	0	0	1.02
6037239501	67.63	98.52	95-100% (highest scores)	Los Angeles	3729	17.43	73.42	9.14	75.92	1.58	21.86	0	0.43	0.21
6037239502	55.54	92.95	90-95%	Los Angeles	4016	14.57	79.96	5.48	78.16	0.2	21.14	0	0	0.5
6037239601	62.40	96.72	95-100% (highest scores)	Los Angeles	3682	20.04	74.39	5.57	78.87	0.49	18.31	0.16	0.24	1.93
6037239602	62.92	97.04	95-100% (highest scores)	Los Angeles	4016	17.46	79.06	3.49	79.48	0.5	19.6	0	0.42	0
6037239701	66.53	98.26	95-100% (highest scores)	Los Angeles	5134	20.55	73.2	6.25	83.79	0	16.21	0	0	0
6037239702	70.76	99.22	95-100% (highest scores)	Los Angeles	4334	12.87	80.64	6.48	70.05	0.32	29.63	0	0	0
6037239801	51.30	89.22	85-90%	Los Angeles	3705	14.82	78.79	6.4	78.68	0.11	20.13	0	0.13	0.94
6037239802	60.01	95.69	95-100% (highest scores)	Los Angeles	5461	14.47	80.19	5.35	70.1	1.08	27.17	0	0.48	1.17
6037240010	66.43	98.22	95-100% (highest scores)	Los Angeles	3737	15.15	78.7	6.15	74.12	0.13	25.23	0	0	0.51
6037240020	60.22	95.81	95-100% (highest scores)	Los Angeles	5223	17.73	75.51	6.76	71.05	0.38	28.51	0	0	0.06
6037240200	68.33	98.71	95-100% (highest scores)	Los Angeles	5159	16.48	76.04	7.48	74.88	0.35	22.41	0.7	1.67	0
6037240300	59.38	95.28	95-100% (highest scores)	Los Angeles	5637	21.59	71.3	7.11	62.59	0.9	36.03	0	0.35	0.12
6037240401	55.68	93.02	90-95%	Los Angeles	6379	17.2	77.94	4.86	80.69	0.16	18.31	0	0.72	0.13
6037240402	58.79	94.98	90-95%	Los Angeles	3763	13.55	77.81	8.64	64.1	1.44	32.98	0	1.09	0.4
6037240500	74.91	99.65	95-100% (highest scores)	Los Angeles	7326	17.13	76.59	6.28	72.13	0	26.74	0	0	1.13

6037240600	64.15	97.53	95-100% (highest scores)	Los Angeles	6167	19.51	71.74	8.76	69.29	1.26	29.12	0	0.32	0
6037240700	57.60	94.29	90-95%	Los Angeles	6596	17.57	74.82	7.61	71.15	0.3	26.83	0.55	1.17	0
6037240800	57.23	94.05	90-95%	Los Angeles	4341	13.78	77.61	8.62	69.55	0.78	25.92	0.65	2.05	1.06
6037240900	61.49	96.37	95-100% (highest scores)	Los Angeles	6736	21.3	71.57	7.13	78.74	0	20.98	0	0.28	0
6037241001	64.86	97.76	95-100% (highest scores)	Los Angeles	4197	14.39	79.1	6.5	72	0.12	24.85	0	0.38	2.64
6037241002	68.15	98.65	95-100% (highest scores)	Los Angeles	4144	16.77	75.41	7.82	59.29	0.39	37.26	0	0.07	2.99
6037241110	53.31	91.15	90-95%	Los Angeles	3356	16.92	75.54	7.54	73.69	0.92	25.27	0	0.12	0
6037241120	68.26	98.70	95-100% (highest scores)	Los Angeles	5146	15.97	76.64	7.38	70.5	0.74	26.23	0	1.65	0.87
6037241201	58.51	94.78	90-95%	Los Angeles	3015	12.01	78.61	9.39	57.05	1.13	41.06	0	0.56	0.2
6037241202	65.66	97.98	95-100% (highest scores)	Los Angeles	5776	18.96	71.24	9.8	58.74	0.61	35.79	0.76	0.4	3.7
6037241300	53.47	91.30	90-95%	Los Angeles	2480	15.28	72.78	11.94	48.75	3.15	46.05	0	0.6	1.45
6037241400	62.63	96.87	95-100% (highest scores)	Los Angeles	3785	18.39	76.06	5.55	75.69	1.37	18.02	0.4	1.51	3.01
6037242000	61.69	96.48	95-100% (highest scores)	Los Angeles	4189	17.59	76.51	5.9	75.98	3.17	19.65	0	0.38	0.81
6037242100	68.24	98.69	95-100% (highest scores)	Los Angeles	2852	21.67	74.51	3.82	75.77	0.14	22.72	0	1.37	0
6037242200	67.75	98.54	95-100% (highest scores)	Los Angeles	6402	18.34	74.57	7.09	75.66	0.19	23.99	0	0.16	0
6037242300	63.19	97.19	95-100% (highest scores)	Los Angeles	4952	19.22	76.39	4.38	73.97	0.4	15.59	2.61	4.3	3.13
6037242600	73.34	99.52	95-100% (highest scores)	Los Angeles	4756	21.64	74.41	3.95	64	0.06	34.15	0	0	1.79
6037242700	73.33	99.51	95-100% (highest scores)	Los Angeles	6035	17.76	76.59	5.65	75.72	1.13	22.75	0.03	0.18	0.18
6037243000	63.83	97.43	95-100% (highest scores)	Los Angeles	6829	22.7	71.77	5.54	83.06	0.5	11.35	4.1	0.6	0.4
6037243100	76.85	99.84	95-100% (highest scores)	Los Angeles	6772	22.65	70.85	6.5	67.22	1.86	30.38	0	0.22	0.32
6037261101	8.73	10.01	10-15%	Los Angeles	3389	9.06	71.67	19.27	6.64	85.66	1.24	0	4.93	1.53
6037261102	6.00	4.61	1-5% (lowest scores)	Los Angeles	3520	10.06	60.11	29.83	1.62	88.75	2.61	0	4.86	2.16
6037261200	6.95	6.67	5-10%	Los Angeles	4182	13.53	64.4	22.07	2.58	85.51	0.48	0	9.11	2.32
6037262100	7.61	7.90	5-10%	Los Angeles	2678	7.51	55.12	37.38	5.19	75.47	0.67	0	13.74	4.93
6037262200	7.71	8.04	5-10%	Los Angeles	4405	13.46	60.41	26.13	3.06	77.8	4.34	0	6.9	7.9
6037262301	6.51	5.79	5-10%	Los Angeles	2748	9.13	64.19	26.67	10.66	72.05	2.47	0	13.17	1.64
6037262302	6.54	5.86	5-10%	Los Angeles	2845	11.53	66.61	21.86	8.08	82.43	0.46	0	6.54	2.5
6037262303	6.22	5.16	5-10%	Los Angeles	3038	10.53	61.03	28.44	2.67	85.42	0	1.32	6.06	4.54
6037262400	2.16	0.29	1-5% (lowest scores)	Los Angeles	3059	12.52	64.5	22.98	2.39	87.77	2.75	0.36	4.67	2.06
6037262501	6.96	6.72	5-10%	Los Angeles	3785	15.11	63.91	20.98	4.44	86.74	0	0.24	4.44	4.15
6037262601	5.20	3.35	1-5% (lowest scores)	Los Angeles	3539	12.21	64.17	23.62	5.65	71.26	1.3	0	9.04	12.74
6037262604	3.85	1.31	1-5% (lowest scores)	Los Angeles	5523	14.01	58.34	27.65	3.31	86.24	0	0	5.63	4.82
6037262704	18.27	33.42	30-35%	Los Angeles	3561	5.17	75.37	19.46	6.49	82	0.67	0	6.91	3.93
6037262706	4.17	1.79	1-5% (lowest scores)	Los Angeles	3571	12.99	66.65	20.36	5.68	86.92	0.25	0	2.63	4.51
6037262802	2.23	0.34	1-5% (lowest scores)	Los Angeles	3424	11.42	61.89	26.69	10.72	80.96	0.32	0	2.98	5.02
6037264000	13.34	21.33	20-25%	Los Angeles	3069	13.59	59.66	26.75	3.58	90.39	0	0	2.51	3.52
6037264102	11.66	16.96	15-20%	Los Angeles	2998	6	78.29	15.71	8.47	76.35	1.47	0	9.31	4.4
6037264103	16.66	29.55	25-30%	Los Angeles	2658	10.42	74.98	14.6	5.79	80.1	0.45	0.45	7.41	5.79
6037264301	21.66	41.40	40-45%	Los Angeles	5552	4.61	85.03	10.36	7.15	73.56	2.5	0	12.93	3.85
6037264302	10.46	14.02	10-15%	Los Angeles	5882	9.28	73.09	17.63	5.15	82.13	2.24	0	6.17	4.3
6037265100	10.57	14.35	10-15%	Los Angeles	2454	7.09	46.13	46.78	5.34	88.06	1.14	0	3.02	2.44
6037265201	21.38	40.83	40-45%	Los Angeles	2567	5.65	81.77	12.58	9.7	65.56	2.3	0	19.24	3.19
6037265202	20.25	38.12	35-40%	Los Angeles	3981	8.47	72.8	18.74	12.69	60.66	0.43	0	22.38	3.84
6037265301	NA	NA	NA	Los Angeles	11977	0	100	0	22.43	26.38	4.06	0.14	40.3	6.68
6037265303	23.64	45.70	45-50%	Los Angeles	5156	1.78	97.96	0.25	16.02	31.61	3.36	0	44.66	4.34
6037265304	20.96	39.93	35-40%	Los Angeles	2878	1.01	97.19	1.81	17.37	37.42	1.74	0	36	7.47
6037265305	24.13	47.04	45-50%	Los Angeles	3990	1.6	98.05	0.35	18.92	34.91	0.25	0.03	37.82	8.07
6037265410	17.58	31.74	30-35%	Los Angeles	1495	16.99	66.82	16.19	6.49	79.6	0	0	9.7	4.21
6037265420	5.73	4.17	1-5% (lowest scores)	Los Angeles	1838	14.42	62.3	23.29	1.47	77.69	5.71	0	11.04	4.08
6037265510	22.93	44.30	40-45%	Los Angeles	4663	6.24	85.59	8.17	7.72	48.98	2.81	0.9	36.91	2.68
6037265520	15.87	27.50	25-30%	Los Angeles	5059	10.87	73.57	15.56	4.33	58.19	10.26	0	15.04	12.18
6037265601	11.69	17.02	15-20%	Los Angeles	3615	11.4	74.55	14.05	4.12	74.72	0	0	16.98	4.18
6037265602	18.40	33.67	30-35%	Los Angeles	3044	7.16	61.5	31.34	4.86	73.88	3.29	0	12.16	5.81
6037265700	19.90	37.30	35-40%	Los Angeles	4636	10.22	61	28.77	8.11	74.18	1.53	0	7.72	8.46
6037267100	15.52	26.77	25-30%	Los Angeles	6649	10.6	73.51	15.88	6.5	64.39	3.44	0	18.84	6.83
6037267200	21.08	40.15	40-45%	Los Angeles	7004	7.18	76.56	16.26	6.62	67.6	3.71	0	16.25	5.81
6037267300	34.00	65.80	65-70%	Los Angeles	4235	4.6	83.28	12.11	17.43	47.58	5.15	0	26.07	3.78
6037267402	23.02	44.57	40-45%	Los Angeles	4872	4.99	82.51	12.5	14.45	62.71	2.75	0	17.49	2.61

6037267403	30.56	59.78	**55-60%**	Los Angeles	3000	2.83	88.93	8.23	12.2	57.87	4.7	0	22.17	3.07
6037267404	21.96	42.07	**40-45%**	Los Angeles	3475	4.2	87.51	8.29	7.71	61.27	5.87	0	17.93	7.22
6037267501	26.82	52.70	**50-55%**	Los Angeles	5993	11.61	81.26	7.12	28.48	47.69	2.59	0	15.58	5.66
6037267502	27.65	54.21	**50-55%**	Los Angeles	3632	9.77	81	9.22	25.17	48.1	1.84	0.55	18.42	5.92
6037267600	30.96	60.55	**60-65%**	Los Angeles	2916	8.26	75.82	15.91	20.27	37.86	5.56	0	31.07	5.25
6037267700	29.15	57.15	**55-60%**	Los Angeles	3276	4.91	80.22	14.87	19.05	45.09	1.04	0	29.43	5.4
6037267800	26.43	51.77	**50-55%**	Los Angeles	2666	10.88	71.04	18.08	9.23	65.23	0.6	0	20.21	4.73
6037267901	20.04	37.66	**35-40%**	Los Angeles	2428	4.53	43.9	51.57	3.13	74.38	1.44	0	18.12	2.92
6037267902	16.79	29.93	**25-30%**	Los Angeles	3365	14.29	67.64	18.07	4.13	71.74	6.06	0	15.1	2.97
6037269000	8.26	9.08	**5-10%**	Los Angeles	4813	9.1	69.81	21.09	15.44	69.21	1	0	12.49	1.87
6037269100	13.76	22.38	**20-25%**	Los Angeles	4274	16.92	66.73	16.35	7.79	82.24	1.57	0	5.9	2.5
6037269300	12.35	18.87	**15-20%**	Los Angeles	3840	14.19	66.64	19.17	3.8	77.71	1.69	0	8.88	7.92
6037269500	7.48	7.59	**5-10%**	Los Angeles	3797	17.59	66.74	15.67	1.92	89.02	0.76	0	6.69	1.61
6037269601	38.10	72.31	**70-75%**	Los Angeles	3393	11.41	80.81	7.78	58.94	13.85	21.49	0	5.04	0.68
6037269602	24.75	48.21	**45-50%**	Los Angeles	2865	7.64	84.85	7.5	34.69	33.3	14.03	0	4.33	13.65
6037269700	39.11	73.65	**70-75%**	Los Angeles	3546	8.35	80.94	10.72	32.04	40.95	8.91	0	14.3	3.81
6037269800	27.29	53.59	**50-55%**	Los Angeles	3046	5.68	86.84	7.49	14.38	47.08	7.35	0	27.74	3.45
6037269903	27.91	54.78	**50-55%**	Los Angeles	3421	5.29	87.37	7.34	20.52	36.25	8.74	0	22.83	11.66
6037269904	19.47	36.09	**35-40%**	Los Angeles	3927	7.56	85.87	6.57	14.51	50.6	12.45	0	19.05	3.39
6037269905	20.66	39.22	**35-40%**	Los Angeles	2459	3.82	91.5	4.68	25.62	35.87	12.81	0	20.78	4.92
6037269906	19.70	36.72	**35-40%**	Los Angeles	3158	6.65	86.38	6.97	25.33	42.02	5.89	0.44	22.58	3.74
6037269907	25.52	49.89	**45-50%**	Los Angeles	2692	5.57	88	6.43	16.64	37.89	18.54	0	19.5	7.43
6037270100	30.12	58.98	**55-60%**	Los Angeles	4202	5.5	88.2	6.31	15.9	36.55	10.76	1.86	26.3	8.64
6037270200	30.56	59.76	**55-60%**	Los Angeles	3226	7.28	78.64	14.07	52.42	26.44	6.51	0	10.42	4.22
6037270300	34.89	67.40	**65-70%**	Los Angeles	2542	11.64	74.86	13.49	35.13	15.58	35.13	0.08	10.39	3.7
6037271100	24.63	48.03	**45-50%**	Los Angeles	2445	11.41	69.12	19.47	18.77	52.43	2.13	0	22.58	4.09
6037271200	35.98	69.13	**65-70%**	Los Angeles	2770	6.64	84.98	8.38	35.63	39.17	4.87	0	17.55	2.78
6037271300	21.76	41.65	**40-45%**	Los Angeles	4395	9.24	72.22	18.54	15.38	62.64	0.57	0	18.68	2.73
6037271400	13.99	23.05	**20-25%**	Los Angeles	3743	16.22	59.95	23.83	10.98	70.61	1.23	0	11.68	5.5
6037271500	8.71	9.96	**5-10%**	Los Angeles	3187	11.23	65.36	23.41	11.04	66.93	3.29	0.5	14.4	3.83
6037271600	20.29	38.17	**35-40%**	Los Angeles	4811	14.88	76.05	9.06	14.01	45.96	4.12	0.29	29.14	6.49
6037271701	20.52	38.84	**35-40%**	Los Angeles	5694	10.96	75.13	13.91	12.14	45.31	13.05	0.37	25.94	3.2
6037271702	21.38	40.82	**40-45%**	Los Angeles	3918	15.19	78.1	6.71	17.3	34.84	5.13	1.84	36.75	4.13
6037271801	25.42	49.75	**45-50%**	Los Angeles	3071	5.44	83.46	11.1	28.13	34.61	6.38	0	27.97	2.9
6037271802	18.84	34.82	**30-35%**	Los Angeles	5644	5.72	84.36	9.92	28.19	40.59	4.61	0	24.01	2.6
6037271901	23.90	46.53	**45-50%**	Los Angeles	3245	4.22	82.34	13.44	28.54	39.69	8.51	0	18.71	4.56
6037271902	15.84	27.43	**25-30%**	Los Angeles	4207	7.87	78.3	13.83	33.35	43.97	6.73	0.5	10.32	5.13
6037272100	16.86	30.12	**30-35%**	Los Angeles	4578	12.06	74.12	13.83	28.4	58.34	0.92	0.48	6.06	5.81
6037272201	22.98	44.44	**40-45%**	Los Angeles	2390	4.06	87.24	8.7	40.13	45.31	2.13	0	10.42	2.01
6037272202	25.13	49.02	**45-50%**	Los Angeles	3359	9.44	81.36	9.2	41.26	35.87	4.85	0.39	10.06	7.56
6037272301	30.00	58.66	**55-60%**	Los Angeles	3045	7.72	74.65	17.64	28.08	47.55	2.5	0.33	14.45	7.09
6037272302	23.70	45.94	**45-50%**	Los Angeles	4457	7.52	81.04	11.44	48.89	35.23	3.79	0	9.94	2.15
6037273100	19.55	36.32	**35-40%**	Los Angeles	2742	11.05	76.15	12.8	20.31	67.25	2.26	0.18	7.8	2.19
6037273200	26.06	51.06	**50-55%**	Los Angeles	3229	7.09	82.13	10.78	34.65	53.08	6.53	0.5	2.23	3
6037273300	23.31	45.18	**45-50%**	Los Angeles	2915	5.59	84.12	10.29	24.87	55.06	14.34	0	2.4	3.33
6037273402	17.78	32.19	**30-35%**	Los Angeles	2641	4.35	78.38	17.27	13.78	79.02	5.94	0	0.19	1.06
6037273502	18.26	33.38	**30-35%**	Los Angeles	2861	7.44	82.8	9.75	11.46	76.69	6.08	0.63	2.03	3.11
6037273600	18.22	33.32	**30-35%**	Los Angeles	2375	7.33	77.31	15.37	15.2	79.49	1.77	0	1.43	2.11
6037273700	12.10	18.20	**15-20%**	Los Angeles	2895	8.84	80.73	10.43	23.42	62.87	5.35	0	3.18	5.18
6037273800	13.55	21.82	**20-25%**	Los Angeles	2872	7.45	79.77	12.78	22.25	62.4	3.45	0.38	8.15	3.38
6037273902	20.56	38.96	**35-40%**	Los Angeles	4221	8.93	71.64	19.43	10.87	78.51	1.8	0	3.84	4.98
6037274100	22.26	42.66	**40-45%**	Los Angeles	4838	12.65	74.33	13.02	5.37	63.08	14.39	0	9.8	7.36
6037274202	17.68	31.98	**30-35%**	Los Angeles	4284	6.98	70.19	22.83	9.99	75.63	1.56	0	8.22	4.6
6037275101	27.54	54.00	**50-55%**	Los Angeles	1161	7.24	76.57	16.19	25.67	40.31	2.07	0	26.79	5.17
6037275102	35.70	68.72	**65-70%**	Los Angeles	4338	12.54	80.57	6.89	69.82	18.28	5.53	0	4.01	2.35
6037275200	35.74	68.76	**65-70%**	Los Angeles	3751	7.62	78.78	13.6	37.99	35.62	7.17	0.56	13.3	5.36
6037275302	25.06	48.84	**45-50%**	Los Angeles	5059	7.35	70.25	22.4	7.89	67.01	4.29	0	15.44	5.38
6037275311	19.37	35.89	**35-40%**	Los Angeles	5462	9.81	69.94	20.25	29.46	42.75	4.21	0	19.24	4.34

6037275400	16.49	29.06	25-30%	Los Angeles	4069	6.98	80.29	12.73	12.98	64.86	2.46	0	15.09	4.62
6037275500	30.89	60.45	60-65%	Los Angeles	5449	13.47	71.81	14.72	64.09	18.08	6.9	0	8.33	2.61
6037275602	19.26	35.77	35-40%	Los Angeles	12100	16.87	74.74	8.39	13.64	52.65	6.57	0	23.16	3.98
6037275603	29.19	57.25	55-60%	Los Angeles	2537	11.31	68.74	19.94	24.08	42.85	2.68	0	25.54	4.85
6037276000	13.57	21.89	20-25%	Los Angeles	5657	9.03	72.92	18.05	25.17	51.62	6.36	0.99	12.52	3.34
6037276100	22.44	43.15	40-45%	Los Angeles	5739	10.47	80.45	9.08	17.88	22.16	35.15	0	17.65	7.16
6037276400	11.39	16.35	15-20%	Los Angeles	4071	10.83	64.55	24.61	15.43	70.89	2.43	0	7.76	3.49
6037276500	19.30	35.80	35-40%	Los Angeles	5674	2.98	91.54	5.48	16.85	54.41	6.71	0.21	15.58	6.24
6037276601	11.66	16.98	15-20%	Los Angeles	4115	9.02	72.52	18.47	9.33	64.45	5.44	0	13.27	7.51
6037276603	13.65	22.09	20-25%	Los Angeles	5489	4.34	81.69	13.97	11.46	60.94	10.6	0.49	12.88	3.63
6037276604	14.47	24.23	20-25%	Los Angeles	4624	7.48	82.4	10.12	16.46	50.11	7.63	0	19.51	6.29
6037277000	15.73	27.18	25-30%	Los Angeles	5566	12.47	68.24	19.3	10.65	66.78	3.79	1.22	13.33	4.22
6037277100	22.11	42.39	40-45%	Los Angeles	3100	8.87	74.9	16.23	19.26	52.03	1.81	0	13.87	13.03
6037277200	42.65	78.91	75-80%	Los Angeles	2196	7.83	83.97	8.2	34.79	22.91	27.5	0	9.79	5.01
6037277400	46.69	84.04	80-85%	Los Angeles	909	19.25	76.57	4.18	32.23	5.28	47.96	0	6.6	7.92
6037278001	19.25	35.72	35-40%	Los Angeles	2508	13.64	74.36	12	29.74	46.37	4.23	0	14.39	5.26
6037278102	9.91	12.70	10-15%	Los Angeles	3088	4.92	76.23	18.85	13.02	75.32	1	0	6.93	3.72
6037291110	66.54	98.27	95-100% (highest scores)	Los Angeles	4391	18.01	71.03	10.95	51.04	1.09	47.19	0.3	0	0.39
6037291120	58.13	94.58	90-95%	Los Angeles	2407	13.38	78.98	7.64	64.6	1.29	32.95	0	1.16	0
6037291130	63.50	97.28	95-100% (highest scores)	Los Angeles	3626	12.93	76.56	10.51	66.82	3.39	17.65	0	9.9	2.23
6037291210	74.44	99.61	95-100% (highest scores)	Los Angeles	5768	15.36	73.47	11.17	65.41	7.06	9.71	0.26	16.89	0.68
6037291220	77.25	99.86	95-100% (highest scores)	Los Angeles	3640	12.77	73.16	14.07	69.34	3.98	8.43	0	16.32	1.92
6037291300	53.29	91.12	90-95%	Los Angeles	3037	8.5	68.88	22.62	24.63	14.72	9.52	0.23	43.82	7.08
6037292000	67.09	98.46	95-100% (highest scores)	Los Angeles	6567	14.45	76.08	9.47	55.41	7.54	10.67	0	17.89	8.48
6037293201	47.97	85.43	85-90%	Los Angeles	6289	12.48	73.68	13.83	53.35	15.04	5.96	0	23.52	2.13
6037293202	52.84	90.77	90-95%	Los Angeles	6740	18.87	75.82	5.31	70.68	4.84	7.76	0	14.97	1.75
6037293301	27.01	53.01	50-55%	Los Angeles	3108	7.56	70.17	22.27	13.96	28.22	1.35	0	49.23	7.24
6037293302	41.90	77.87	75-80%	Los Angeles	5082	14.74	71.76	13.5	30.4	25.52	13.75	0	28.53	1.79
6037293304	42.42	78.57	75-80%	Los Angeles	4832	14.67	76.72	8.61	68.07	11.05	6.79	0	11.03	3.06
6037293306	24.20	47.13	45-50%	Los Angeles	2436	11.9	71.59	16.5	44.62	34.28	5.05	0	13.05	3
6037293307	42.37	78.54	75-80%	Los Angeles	2284	10.25	80.65	9.11	60.6	11.34	8.01	0	17.34	2.71
6037294110	51.84	89.84	85-90%	Los Angeles	4129	17.05	70.94	12.01	84.72	9.52	0	0	3.51	2.25
6037294120	62.66	96.89	95-100% (highest scores)	Los Angeles	2687	19.87	73.35	6.77	92.52	2.05	3.24	0	1.86	0.33
6037294200	42.18	78.28	75-80%	Los Angeles	4874	13.01	73.1	13.89	87.63	5.35	2.46	0.39	3.88	0.29
6037294301	40.80	76.31	75-80%	Los Angeles	2471	10.68	71.27	18.05	82.03	5.63	1.38	0	10.32	0.65
6037294302	53.28	91.11	90-95%	Los Angeles	4382	11.68	77.32	11	86.06	6.48	4.36	0.3	1.9	0.91
6037294410	45.77	82.96	80-85%	Los Angeles	5079	15.53	76.41	8.05	38.35	8.53	24.77	0	27.05	1.3
6037294421	55.86	93.13	90-95%	Los Angeles	2891	14.42	74.54	11.03	74.06	8.27	4.6	0	11.48	1.59
6037294510	47.74	85.17	85-90%	Los Angeles	5082	19.46	73.95	6.59	97.56	1.93	0.2	0	0.16	0.16
6037294520	47.16	84.63	80-85%	Los Angeles	3710	17.84	74.96	7.2	93.42	3.53	2.16	0.24	0.65	0
6037294610	45.55	82.65	80-85%	Los Angeles	4334	22.08	66.27	11.65	90.26	3.35	1.04	0	5.35	0
6037294620	53.14	90.96	90-95%	Los Angeles	4683	12.81	75.81	11.38	93.23	3.33	1.54	0	1.43	0.47
6037294701	71.29	99.27	95-100% (highest scores)	Los Angeles	3099	17.59	73.7	8.71	90.29	2.78	4.9	0	0.58	1.45
6037294810	52.91	90.80	90-95%	Los Angeles	4278	17.81	78.17	4.02	90.79	2.45	2.52	0	3.39	0.84
6037294820	58.86	95.02	95-100% (highest scores)	Los Angeles	3473	20.79	72.79	6.42	96.69	0.75	0.89	0	1.67	0
6037294830	64.76	97.73	95-100% (highest scores)	Los Angeles	4134	15.41	78.59	6	93.54	0.77	3.41	0	0.8	1.48
6037294900	61.64	96.47	95-100% (highest scores)	Los Angeles	3853	18.25	71.87	9.89	87.65	3.61	3.24	0	3.43	2.08
6037295103	24.04	46.81	45-50%	Los Angeles	5188	10.47	67.85	21.68	29.57	46.99	4.12	0.29	16.79	2.24
6037296210	70.53	99.19	95-100% (highest scores)	Los Angeles	3132	19.32	72.38	8.3	87.04	5.91	6	0	0.32	0.73
6037296220	54.01	91.68	90-95%	Los Angeles	4447	12.08	73.71	14.21	65.26	9.26	12.77	0	9.96	2.74
6037296300	32.82	63.69	60-65%	Los Angeles	5027	12.21	72.17	15.62	23.29	41.42	9.11	0	24.77	1.41
6037296401	13.20	20.89	20-25%	Los Angeles	3229	7.06	69.25	23.69	24.25	54.54	5.2	0	11.4	4.61
6037296402	17.91	32.49	30-35%	Los Angeles	3312	13.35	70.77	15.88	53.89	35.36	2.99	0	7.73	0.03
6037296500	58.36	94.69	90-95%	Los Angeles	3447	12.21	73.05	14.74	71.16	9.31	11.55	0.29	4.35	3.34
6037296600	49.96	87.82	85-90%	Los Angeles	5358	17.88	69.78	12.34	75.49	14.84	5.84	0.09	2.15	1.59
6037296901	36.75	70.20	70-75%	Los Angeles	4466	18.23	76.2	5.58	63.99	18.52	9.23	0.18	3.83	4.25
6037296902	38.33	72.69	70-75%	Los Angeles	4219	12.44	75.14	12.42	59.61	29.22	3.93	0.36	2.39	4.48
6037297000	16.87	30.13	30-35%	Los Angeles	5597	10.85	71.79	17.37	37.07	46.92	4.81	0	4.97	6.24

6037297110	62.39	96.71	95-100% (highest scores)	Los Angeles	4649	10.97	79.39	9.64	64.27	16.3	11.08	0	5.79	2.56
6037297120	50.37	88.30	85-90%	Los Angeles	3053	11.66	74.19	14.15	67.87	17.13	5.6	0	9.4	0
6037297201	34.48	66.63	65-70%	Los Angeles	4505	21.09	70.39	8.52	64.2	18.82	7.26	0.49	5.42	3.82
6037297202	21.38	40.81	40-45%	Los Angeles	3786	13.34	72.87	13.79	47.31	47.68	2.03	0	1.88	1.11
6037297300	18.27	33.41	30-35%	Los Angeles	2193	20.66	62.06	17.28	30.6	52.85	6.11	0	5.52	4.92
6037297400	17.38	31.22	30-35%	Los Angeles	3356	4.05	62.43	33.52	22.88	67.28	2.41	0	5.07	2.35
6037297500	26.39	51.61	50-55%	Los Angeles	4707	4.97	73.34	21.69	32.12	56.04	3.08	0	4.82	3.93
6037297601	34.75	67.17	65-70%	Los Angeles	2816	18.22	70.45	11.33	33.63	42.12	7.67	0.28	3.3	13
6037297602	30.09	58.84	55-60%	Los Angeles	3687	9.25	71.71	19.04	38.7	44.29	3.39	0.24	9.49	3.88
6037300100	8.45	9.56	5-10%	Los Angeles	6014	11.71	68.76	19.54	11.67	57.91	0.32	0	27	3.09
6037300200	18.25	33.36	30-35%	Los Angeles	5352	9.94	74.42	15.64	9.94	51.25	0.71	0.26	35.56	2.28
6037300301	12.07	18.15	15-20%	Los Angeles	6024	9.38	70.83	19.79	8.25	64.24	0.35	0	21.56	5.59
6037300400	28.48	55.87	55-60%	Los Angeles	5986	10.57	75.06	14.37	17.52	54.09	0.02	0	22.95	5.41
6037300501	17.95	32.55	30-35%	Los Angeles	3264	13.6	68.29	18.11	15.17	45.99	0	0	25.03	13.82
6037300502	24.25	47.31	45-50%	Los Angeles	5874	9.09	76.78	14.13	28.09	43.51	0.02	0	25.61	2.77
6037300600	20.52	38.83	35-40%	Los Angeles	9609	7.75	76.25	16	16.97	48.82	1.25	0	31.43	1.53
6037300701	16.72	29.69	25-30%	Los Angeles	5835	10.78	70.51	18.71	8.6	74.55	0.99	0	11.36	4.49
6037300702	9.67	12.19	10-15%	Los Angeles	5430	10.22	69.8	19.98	4.84	84.03	0	0	7.88	3.24
6037300800	21.37	40.76	40-45%	Los Angeles	7280	10.07	75.44	14.49	12.94	56.13	0.58	0.16	22.39	7.8
6037300901	12.26	18.66	15-20%	Los Angeles	6540	14.45	66.67	18.88	4.4	65.37	0.73	0	23.93	5.57
6037300902	27.15	53.34	50-55%	Los Angeles	1981	10.75	66.48	22.77	15.6	65.27	0	0	14.79	4.34
6037301000	31.45	61.37	60-65%	Los Angeles	5230	11.45	72.35	16.2	18.3	57.27	1.8	0	15.39	7.25
6037301100	25.24	49.34	45-50%	Los Angeles	7114	8.34	73.69	17.98	10.94	73.56	1.22	0	10.16	4.12
6037301203	30.41	59.52	55-60%	Los Angeles	4711	6.58	69.05	24.37	14.99	65.4	3.14	0	13.12	3.35
6037301204	35.43	68.29	65-70%	Los Angeles	5284	9.35	73.41	17.24	16.01	59.9	7.68	0	16.03	0.38
6037301205	21.07	40.10	40-45%	Los Angeles	2106	9.54	69.94	20.51	11.49	72.7	1.38	0	11.63	2.8
6037301206	39.44	74.03	70-75%	Los Angeles	5281	8.63	73.77	17.59	8.16	74.06	3.03	0	13.61	1.14
6037301300	26.48	51.92	50-55%	Los Angeles	1894	13.94	60.82	25.24	7.81	84.27	0	0	7.6	0.32
6037301400	22.19	42.55	40-45%	Los Angeles	4190	10.91	72.22	16.87	6.47	81.1	0.17	2.53	5.49	4.25
6037301501	25.95	50.88	50-55%	Los Angeles	1790	7.54	70.06	22.4	12.12	76.26	0.28	0	10.45	0.89
6037301502	46.58	83.93	80-85%	Los Angeles	6750	7.54	75.5	16.96	11.57	78.9	0	0	8.31	1.21
6037301601	66.08	98.11	95-100% (highest scores)	Los Angeles	6112	6.27	72.28	21.45	21.94	69.04	3.11	0	4.22	1.69
6037301602	55.99	93.27	90-95%	Los Angeles	4446	10.8	77.62	11.58	40.37	41.84	3.08	0	12.28	2.43
6037301701	49.53	87.39	85-90%	Los Angeles	2962	8.41	72.28	19.31	30.42	49.19	4.09	0	12.9	3.41
6037301702	57.75	94.38	90-95%	Los Angeles	5835	11.93	73.13	14.94	14.1	64.9	2.19	1.32	15.41	2.07
6037301801	47.98	85.44	85-90%	Los Angeles	5258	11.07	75.6	13.33	21.09	46.9	1.24	0	25.03	5.74
6037301802	42.49	78.67	75-80%	Los Angeles	4516	7.71	78.7	13.6	12.05	63.8	1.79	0	19	3.37
6037301900	41.74	77.70	75-80%	Los Angeles	8192	10.91	69.21	19.87	14.75	60.91	1.48	0	21.46	1.4
6037302002	47.67	85.11	85-90%	Los Angeles	3949	11.24	69.87	18.89	12.43	64.09	3.09	0	18.06	2.33
6037302003	39.01	73.47	70-75%	Los Angeles	3665	8.29	74.54	17.16	10.56	67.89	0.82	0	18.07	2.67
6037302004	41.78	77.77	75-80%	Los Angeles	4151	8.99	73.04	17.97	18.53	57.79	2.6	0	19.01	2.07
6037302102	34.46	66.60	65-70%	Los Angeles	5946	8.54	72.55	18.9	15.22	59.2	2.94	0	21.81	0.82
6037302103	42.32	78.48	75-80%	Los Angeles	5430	9.06	72.14	18.8	14.64	68.86	0.88	0	14.42	1.2
6037302104	49.20	87.04	85-90%	Los Angeles	4288	10.59	73.27	16.14	21.48	44.36	2.94	0	29.06	2.17
6037302201	42.23	78.35	75-80%	Los Angeles	4019	7.66	67.55	24.78	9.68	76.81	2.44	0	8.73	2.34
6037302202	50.88	88.72	85-90%	Los Angeles	5510	9.49	72.7	17.8	25.66	57.17	1.34	0	14.08	1.74
6037302301	51.22	89.11	85-90%	Los Angeles	3985	10.94	71.12	17.94	21.66	60	0.75	0.15	15.71	1.73
6037302302	66.71	98.34	95-100% (highest scores)	Los Angeles	5337	10.34	74.97	14.69	45.53	36.69	1.76	0	15.08	0.94
6037302401	68.86	98.85	95-100% (highest scores)	Los Angeles	7395	11.32	74.44	14.24	33.23	50.95	2.66	0	12.59	0.57
6037302503	51.92	89.94	85-90%	Los Angeles	4290	10.42	73.1	16.48	21.93	61.98	0	0	14.99	1.1
6037302504	53.23	91.06	90-95%	Los Angeles	4273	8.35	77.63	14.02	30.7	54.08	0.84	0	11.96	2.41
6037302505	60.76	96.17	95-100% (highest scores)	Los Angeles	4376	11.77	71.46	16.77	33.16	51.81	5.46	0	8.52	1.05
6037302506	51.24	89.15	85-90%	Los Angeles	3262	8.71	72.32	18.98	27.81	53.8	1.81	0	11.87	4.72
6037310100	16.60	29.31	25-30%	Los Angeles	5644	10.86	72.27	16.87	16.97	66.12	4.96	0	10.17	1.77
6037310201	24.59	47.93	45-50%	Los Angeles	5732	8.46	74.7	16.84	12.61	73.94	0.7	0	7.83	4.92
6037310202	28.01	54.98	50-55%	Los Angeles	5104	9.62	74.63	15.75	13.21	72.81	2.53	0.72	5.17	5.56
6037310300	17.74	32.11	30-35%	Los Angeles	2881	13.85	66.61	19.54	12.84	67.41	0	0	15.76	3.99
6037310400	35.62	68.60	65-70%	Los Angeles	3247	11.24	71.02	17.74	16.82	62.64	1.26	0.83	12.44	6.01

6037310501	54.17	91.77	**90-95%**	Los Angeles	4066	13.58	77.27	9.15	47.79	27.77	6.94	0.96	15.27	1.28
6037310601	51.25	89.16	**85-90%**	Los Angeles	6383	13.76	73.38	12.86	23.83	46.42	4.72	0	15.26	9.78
6037310602	23.41	45.40	**45-50%**	Los Angeles	2853	13.99	73.43	12.58	19.21	56.08	1.93	0.25	18.37	4.17
6037310701	41.19	76.90	**75-80%**	Los Angeles	2181	6.97	60.43	32.6	11.33	75.65	0.05	0	8.02	4.95
6037310702	41.55	77.40	**75-80%**	Los Angeles	6567	3.58	72.96	23.47	13.2	63.39	2.48	0	15.96	4.96
6037310703	53.79	91.50	**90-95%**	Los Angeles	4793	11.48	73.21	15.31	20.76	64.05	2.63	0	6.84	5.72
6037310800	32.49	63.30	**60-65%**	Los Angeles	5314	10.59	73.88	15.53	30.39	53.88	1.09	0.58	10.3	3.76
6037310900	31.22	61.08	**60-65%**	Los Angeles	6071	9.9	74.95	15.15	24.77	53.91	1.25	0.23	16.55	3.28
6037311000	32.26	62.86	**60-65%**	Los Angeles	3641	13.4	74.02	12.58	32.35	50.92	2.72	0	10.71	3.3
6037311100	30.30	59.29	**55-60%**	Los Angeles	4183	12.19	68.87	18.93	29	48.2	0.65	2.87	15.54	3.75
6037311200	20.19	37.97	**35-40%**	Los Angeles	3171	8.33	75.15	16.52	25.86	56.01	3.88	0	7.79	6.46
6037311300	23.13	44.83	**40-45%**	Los Angeles	3896	12.63	72.43	14.94	28.29	53.31	2.85	0.21	11.78	3.57
6037311400	23.64	45.71	**45-50%**	Los Angeles	2300	8.48	73.78	17.74	16.83	68.43	1.26	0	10.13	3.35
6037311500	23.48	45.54	**45-50%**	Los Angeles	5828	15.56	74.35	10.09	24.62	57.31	3.5	0.81	11.24	2.52
6037311600	34.42	66.55	**65-70%**	Los Angeles	6707	7.86	81.06	11.08	12.33	58.28	6.47	0	13.43	9.48
6037311700	26.22	51.35	**50-55%**	Los Angeles	6200	7.55	72.92	19.53	21.5	64.97	1.5	1	8.32	2.71
6037311801	42.14	78.25	**75-80%**	Los Angeles	2873	12.63	78	9.36	45.32	37.63	3.2	0.7	11.42	1.74
6037311802	47.13	84.58	**80-85%**	Los Angeles	4068	10.13	82.89	6.98	55.31	24.56	1.5	0.93	14.45	3.24
6037320000	NA	NA	**NA**	Los Angeles	0	NA	NA	NA	NA	NA	NA	NA	NA	NA
6037320100	40.10	75.08	**75-80%**	Los Angeles	7601	10.58	78.74	10.68	91.17	4.41	1.82	0	2.5	0.11
6037320201	51.57	89.52	**85-90%**	Los Angeles	4049	15.63	74.96	9.41	95.73	3.63	0	0	0	0.64
6037320202	41.35	77.18	**75-80%**	Los Angeles	6151	15.02	72.96	12.01	91.59	6.57	0.18	0	1.56	0.1
6037320300	47.23	84.68	**80-85%**	Los Angeles	6734	13.23	75.5	11.27	95.32	1.84	0.42	1.83	0.59	0
6037400204	13.95	22.86	**20-25%**	Los Angeles	5637	6.3	71.31	22.39	21.96	59.62	0.99	0.44	14.69	2.29
6037400205	10.85	15.10	**15-20%**	Los Angeles	2846	5.27	71.54	23.19	10.51	48.91	5.97	0	29.62	4.99
6037400206	17.21	30.82	**30-35%**	Los Angeles	5365	8.57	69.32	22.11	21.99	52.02	2.29	0	19.72	3.97
6037400207	18.30	33.47	**30-35%**	Los Angeles	4608	8.31	71.59	20.1	25.93	56.21	4.06	0	12.57	1.24
6037400302	36.75	70.25	**70-75%**	Los Angeles	3154	15.25	65.28	19.47	37.67	43.82	4.19	0	12.33	2
6037400304	19.19	35.62	**35-40%**	Los Angeles	7788	12.72	73.25	14.02	38.74	37.89	1.31	1.32	18.41	2.32
6037400402	17.16	30.67	**30-35%**	Los Angeles	4305	13.1	71.22	15.68	29.01	53.77	1.11	0	11.45	4.65
6037400403	17.61	31.86	**30-35%**	Los Angeles	3906	8.24	74.91	16.85	35.2	50.18	1.82	0.49	9.17	3.15
6037400404	11.81	17.33	**15-20%**	Los Angeles	4268	6.12	72.42	21.46	19.24	61.9	0	0	13.55	5.32
6037400501	14.58	24.51	**20-25%**	Los Angeles	2049	9.71	67.3	22.99	10.3	69.64	0.24	0	14.44	5.37
6037400602	32.64	63.50	**60-65%**	Los Angeles	4250	13.39	74.33	12.28	68.14	20.73	2.09	0.35	7.79	0.89
6037400603	28.62	56.14	**55-60%**	Los Angeles	5201	11.44	77.22	11.34	53.11	27.46	4.13	0	12.06	3.25
6037400604	26.54	52.07	**50-55%**	Los Angeles	3501	15.14	73.21	11.65	43.47	27.05	4	0.29	23.28	1.91
6037400800	23.35	45.32	**45-50%**	Los Angeles	6967	5.24	86.41	8.35	20.97	47.61	4.84	0.13	22.72	3.73
6037400900	21.72	41.59	**40-45%**	Los Angeles	4424	11.03	72.92	16.05	37.07	45.93	0.97	0	13.36	2.67
6037401001	11.35	16.25	**15-20%**	Los Angeles	3062	11.27	72.27	16.46	21.39	65.41	0.2	0	9.54	3.46
6037401002	23.27	45.08	**45-50%**	Los Angeles	3678	14.49	68.16	17.35	20.01	58.86	2.94	0	11.61	6.58
6037401101	28.35	55.57	**55-60%**	Los Angeles	5582	13.47	71.62	14.91	43.05	39.38	3.42	0.7	9.75	3.71
6037401102	32.15	62.68	**60-65%**	Los Angeles	3896	17.99	70.28	11.73	36.91	39.12	0.69	0	17.2	6.08
6037401201	24.35	47.48	**45-50%**	Los Angeles	3377	17.32	69.11	13.56	33.08	52.8	0.68	0	9.39	4.06
6037401202	23.24	44.99	**40-45%**	Los Angeles	4706	10.24	75.12	14.64	41.03	41.01	0.38	1.25	12.64	3.68
6037401203	29.25	57.38	**55-60%**	Los Angeles	5224	10.47	72.19	17.34	45.39	38.23	1.95	0.21	11.01	3.22
6037401303	22.19	42.51	**40-45%**	Los Angeles	2074	5.01	76.18	18.8	29.94	44.55	1.06	0.29	23.14	1.01
6037401304	17.18	30.75	**30-35%**	Los Angeles	5449	6.7	71.87	21.44	26.17	49.07	2.75	0	15.54	6.46
6037401311	25.25	49.37	**45-50%**	Los Angeles	6120	14.4	70.15	15.46	34	53.61	0.77	0	8.89	2.73
6037401312	29.27	57.40	**55-60%**	Los Angeles	5401	8	66.27	25.74	36.92	45.23	2.3	0	12.16	3.39
6037401500	36.71	70.12	**70-75%**	Los Angeles	6213	10.03	77.11	12.86	46.21	42.88	2.22	0.13	6.71	1.85
6037401601	25.78	50.54	**50-55%**	Los Angeles	5368	10.1	61.57	28.33	34.93	51.27	1.7	0.41	9.91	1.79
6037401602	28.58	56.05	**55-60%**	Los Angeles	6294	14.81	74.18	11.01	45.22	42.88	4.51	0	4.91	2.48
6037401603	32.25	62.83	**60-65%**	Los Angeles	2951	9.83	54.42	35.75	35.68	53.51	4.13	0	5.39	1.29
6037401701	24.14	47.05	**45-50%**	Los Angeles	4488	9.05	65.37	25.58	28.05	45.9	6.71	2.23	10.38	6.73
6037401703	38.37	72.76	**70-75%**	Los Angeles	4107	9.3	76.45	14.24	48.11	29.53	7.94	0	10.66	3.75
6037401704	44.03	80.89	**80-85%**	Los Angeles	7108	13.65	71.23	15.12	60.03	18.77	5.15	1.27	12.39	2.39
6037401800	27.43	53.83	**50-55%**	Los Angeles	7927	9.17	70.83	19.99	25.62	49.97	4.25	0.21	9.76	10.18
6037401901	NA	NA	**NA**	Los Angeles	3945	0.48	99.52	0	20.46	43.19	4.97	0.41	25.24	5.73

6037401902	22.07	42.26	40-45%	Los Angeles	6223	6.67	65.45	27.88	27.01	58.07	4.63	0.9	6.38	3
6037402001	32.93	63.89	60-65%	Los Angeles	3294	16.06	74.13	9.81	36	28.23	11.23	0	17.88	6.65
6037402002	34.66	67.02	65-70%	Los Angeles	4125	11.61	65.65	22.74	37.53	49.67	5.75	0.36	4.68	2.01
6037402101	58.57	94.81	90-95%	Los Angeles	5558	14.9	76.16	8.94	78.93	4.19	7.66	0.56	7.68	0.97
6037402102	49.38	87.28	85-90%	Los Angeles	4858	15.21	74.48	10.31	66.16	11.18	11.45	1.32	8.03	1.87
6037402200	42.70	78.95	75-80%	Los Angeles	6782	11.44	68.7	19.86	59.82	20.55	8.95	0.09	10.1	0.49
6037402301	46.32	83.62	80-85%	Los Angeles	5464	17.44	74.82	7.74	78.79	7.56	2.36	0.33	9.36	1.61
6037402303	57.22	94.02	90-95%	Los Angeles	4080	13.8	77.35	8.85	78.41	13.82	1.52	1.08	3.8	1.37
6037402304	57.44	94.14	90-95%	Los Angeles	4057	17.4	76.53	6.06	88.64	5	1.63	0.1	4.64	0
6037402402	66.40	98.20	95-100% (highest scores)	Los Angeles	6635	12.9	78.31	8.79	67.81	14.15	2.62	0.48	13.46	1.48
6037402403	51.94	89.95	85-90%	Los Angeles	5231	9.69	82.97	7.34	58.42	16.5	4.17	0	16.25	4.66
6037402404	NA	NA	NA	Los Angeles	1862	0	100	0	28.03	32.65	7.41	0	24.06	7.84
6037402405	53.43	91.28	90-95%	Los Angeles	2875	15.03	72.03	12.94	86.89	1.04	9.32	0	1.88	0.87
6037402406	51.51	89.47	85-90%	Los Angeles	5329	13.27	79.58	7.15	85.14	5.95	3.25	0	5.12	0.54
6037402501	50.81	88.65	85-90%	Los Angeles	5591	17.51	74.73	7.76	90.61	3.34	2.54	0	3.15	0.36
6037402502	40.48	75.83	75-80%	Los Angeles	6839	13.79	77.07	9.14	80.38	3.86	3.49	0	11.67	0.6
6037402600	59.53	95.44	95-100% (highest scores)	Los Angeles	7493	17.12	70.36	12.52	70.44	18.71	3.51	0	5.79	1.55
6037402702	59.59	95.47	95-100% (highest scores)	Los Angeles	6365	21.37	74.42	4.21	85.2	3.3	10.42	0	0.97	0.11
6037402703	39.41	73.98	70-75%	Los Angeles	4661	9.25	79.81	10.94	66.94	12.08	10.77	0.19	8.66	1.35
6037402705	33.72	65.38	65-70%	Los Angeles	3254	9.96	76.83	13.21	73.29	11.77	6.21	0	5.87	2.86
6037402706	42.04	78.14	75-80%	Los Angeles	3834	11.89	78.17	9.94	72.09	10.17	6.44	0.03	7.2	4.07
6037402801	64.82	97.74	95-100% (highest scores)	Los Angeles	4976	21.36	73.31	5.33	94.21	1.49	0	1.53	2.77	0
6037402803	36.06	69.23	65-70%	Los Angeles	3270	15.9	78.5	5.6	90.67	0.67	1.83	0	6.64	0.18
6037402804	59.09	95.13	95-100% (highest scores)	Los Angeles	4238	12.88	80.32	6.8	82.33	2.12	3.66	0	11.12	0.78
6037402902	53.05	90.91	90-95%	Los Angeles	6903	10.91	78.23	10.86	75.68	6.35	4.55	0	12.75	0.68
6037402903	48.23	85.79	85-90%	Los Angeles	4363	16.43	71.9	11.67	79.42	4.33	3.62	0	11.07	1.56
6037402904	49.84	87.66	85-90%	Los Angeles	3705	17.27	75.33	7.4	89.15	5.29	1.11	0.49	2.91	1.05
6037403000	50.89	88.74	85-90%	Los Angeles	6950	14.62	71.63	13.76	85.58	2.81	3.77	0	6.52	1.32
6037403200	NA	NA	NA	Los Angeles	399	0	62.41	37.59	17.29	60.9	10.53	0	11.28	0
6037403303	28.46	55.85	55-60%	Los Angeles	2741	10.11	72.02	17.88	31.48	9.38	3.03	0.51	55.42	0.18
6037403304	15.80	27.36	25-30%	Los Angeles	4863	8.12	68.99	22.89	15.3	13.7	0.95	0.82	65.04	4.19
6037403305	10.20	13.46	10-15%	Los Angeles	2294	10.59	74.76	14.65	10.99	9.76	1.53	0	73.41	4.32
6037403312	28.62	56.15	55-60%	Los Angeles	5096	11.42	72.31	16.27	34.32	22.25	1.14	0	41.42	0.86
6037403316	24.21	47.18	45-50%	Los Angeles	6757	10.6	72.92	16.49	19.52	33.76	5.33	0	39.75	1.64
6037403317	23.93	46.60	45-50%	Los Angeles	4710	5.77	76.48	17.75	32.29	14.93	8.24	0.62	39.72	4.2
6037403318	38.79	73.20	70-75%	Los Angeles	6367	9.27	77.24	13.49	30.64	23.31	8.37	0	31.35	6.33
6037403319	24.42	47.67	45-50%	Los Angeles	4046	8.3	73.9	17.8	23.68	13.47	5.59	0.2	52.82	4.25
6037403320	10.95	15.34	15-20%	Los Angeles	4992	9.13	73.82	17.05	14.88	10.56	3.02	0	70.71	0.82
6037403321	21.83	41.83	40-45%	Los Angeles	6303	9.69	74.81	15.5	25.31	20.67	5.49	0	44.55	3.98
6037403322	23.87	46.42	45-50%	Los Angeles	3703	9.42	73.37	17.2	16.8	23.71	1.81	0	54.71	2.97
6037403323	25.21	49.22	45-50%	Los Angeles	5494	8.77	74.83	16.4	8.21	14	3.22	1.33	70.86	2.38
6037403324	11.89	17.62	15-20%	Los Angeles	7193	11.54	70.9	17.56	14.56	9.34	4.05	0.35	70.9	0.81
6037403325	15.97	27.72	25-30%	Los Angeles	5348	14.19	69.67	16.14	15.52	14.6	5.55	0	61.89	2.43
6037403401	22.69	43.68	40-45%	Los Angeles	5136	11.84	65.87	22.29	25.9	7.3	7.48	0	58.53	0.8
6037403402	20.14	37.83	35-40%	Los Angeles	3745	12.84	73.22	13.94	25.21	13.91	2.38	0.37	56.45	1.68
6037403403	25.16	49.09	45-50%	Los Angeles	4898	7.47	67.84	24.68	18.25	5.31	5.06	0	68.66	2.72
6037403404	20.23	38.05	35-40%	Los Angeles	2645	5.41	69.49	25.1	13.65	13.53	4.76	0	66.16	1.89
6037403405	21.98	42.12	40-45%	Los Angeles	1698	6.54	75.38	18.08	20.67	14.78	0.18	0	63.19	1.18
6037403406	19.48	36.14	35-40%	Los Angeles	2955	10.63	75.87	13.5	26.63	23.96	0.71	0	43.62	5.08
6037403407	11.88	17.59	15-20%	Los Angeles	2314	6.53	79.08	14.39	13.05	3.89	2.64	0	80.42	0
6037403408	14.92	25.37	25-30%	Los Angeles	6512	7.77	68.81	23.42	16.57	8.35	5.08	0	66.85	3.15
6037403500	25.82	50.66	50-55%	Los Angeles	1835	8.01	62.34	29.65	36.02	19.78	2.83	0	38.09	3.27
6037403600	25.38	49.63	45-50%	Los Angeles	6690	9.21	68.1	22.69	55.41	21.78	4.33	0.18	17.28	1.02
6037403702	23.94	46.67	45-50%	Los Angeles	3786	10.83	69.92	19.26	46.01	29.69	3.75	0	17.01	3.54
6037403703	16.74	29.77	25-30%	Los Angeles	4542	8.48	67.17	24.35	42.25	42.34	3.48	0	10.57	1.37
6037403721	33.07	64.17	60-65%	Los Angeles	4897	9.76	75.17	15.07	53.44	29.59	2.45	0.31	11.93	2.29
6037403722	33.07	64.16	60-65%	Los Angeles	5628	15.88	74.29	9.83	65.65	19.46	2.26	0	11	1.63
6037403801	29.51	57.88	55-60%	Los Angeles	6224	12.77	76.78	10.44	62.44	16.15	2.39	0.4	17	1.62

6037403802	19.66	36.67	35-40%	Los Angeles	6687	13.8	74.59	11.6	53.39	25.62	4.49	0.43	11.4	4.68
6037403901	28.72	56.33	55-60%	Los Angeles	3174	8.25	77	14.74	53.28	31.7	1.42	0.95	10.21	2.46
6037403902	27.59	54.08	50-55%	Los Angeles	5140	13.93	70.76	15.31	40.08	43.58	6.21	1.17	7.51	1.46
6037404000	32.07	62.52	60-65%	Los Angeles	4614	11.68	77.13	11.18	70.03	19.96	1.28	0	8.73	0
6037404100	31.78	62.04	60-65%	Los Angeles	6277	13.02	77.01	9.97	81.01	6.5	3.47	0	7.31	1.7
6037404201	46.43	83.79	80-85%	Los Angeles	3519	16.14	73.86	10	68.71	15.23	0.71	1.05	11.03	3.27
6037404202	38.15	72.40	70-75%	Los Angeles	4252	6.91	86.1	6.98	54.8	27.92	2.8	0.4	12.37	1.72
6037404301	49.93	87.78	85-90%	Los Angeles	5503	15.94	72.72	11.34	87.23	5.89	3.25	0	3.29	0.35
6037404302	30.80	60.27	60-65%	Los Angeles	2176	15.3	73.07	11.63	73.9	13.14	0.92	0	11.63	0.41
6037404401	43.40	80.03	80-85%	Los Angeles	3715	12.25	77.52	10.23	84.93	9.99	1.13	0	2.63	1.32
6037404402	60.16	95.79	95-100% (highest scores)	Los Angeles	5156	10.76	79.98	9.25	76.24	5.28	2.48	0	13.48	2.52
6037404501	41.68	77.61	75-80%	Los Angeles	2789	14.88	79.74	5.38	85.37	4.84	1	0	6.38	2.4
6037404503	42.78	79.15	75-80%	Los Angeles	2638	12.21	75.17	12.62	74.37	8.38	2.92	0	12.21	2.12
6037404504	31.09	60.80	60-65%	Los Angeles	5073	14.09	76.54	9.36	79.52	7.35	3.37	0	9.52	0.24
6037404600	45.94	83.13	80-85%	Los Angeles	1394	13.2	71.31	15.49	90.32	8.46	0	0	0.65	0.57
6037404701	55.86	93.15	90-95%	Los Angeles	5665	12	75.52	12.48	77.32	3.95	0.19	0	18.23	0.3
6037404702	54.09	91.74	90-95%	Los Angeles	5629	13.84	76.37	9.79	66	3.32	2.5	0	27.84	0.34
6037404703	68.41	98.73	95-100% (highest scores)	Los Angeles	3110	17.52	73.95	8.52	83.92	2.22	1.54	0	11.22	1.09
6037404801	51.36	89.31	85-90%	Los Angeles	7911	13.05	75	11.96	73.18	3.73	0.97	0	21.97	0.15
6037404802	62.77	96.99	95-100% (highest scores)	Los Angeles	4196	13.35	74.86	11.8	73.26	4.46	1.36	0.64	20.18	0.1
6037404803	48.45	86.08	85-90%	Los Angeles	1719	10.76	76.44	12.8	77.43	12.16	0	0	10.41	0
6037404901	46.69	84.06	80-85%	Los Angeles	5700	10.79	75.26	13.95	72.33	3.63	2.65	0	21.39	0
6037404902	34.63	66.99	65-70%	Los Angeles	3968	10.71	74.27	15.02	63.73	2.67	0.05	0	32.76	0.78
6037404903	44.82	81.73	80-85%	Los Angeles	2738	12.89	77.65	9.46	64.83	2.67	0	0	32.51	0
6037405001	50.27	88.21	85-90%	Los Angeles	6029	10.27	76.4	13.34	85.52	2.8	0.58	0	10.6	0.5
6037405002	42.67	78.93	75-80%	Los Angeles	3169	9.34	77.03	13.63	81.41	2.08	0.41	1.23	14.29	0.57
6037405101	42.59	78.79	75-80%	Los Angeles	5617	11.41	74.68	13.9	76.05	3.24	0.84	0	19.58	0.28
6037405102	54.21	91.81	90-95%	Los Angeles	5639	13.26	74.43	12.31	72.14	4.79	2.23	0.46	20.38	0
6037405201	52.47	90.49	90-95%	Los Angeles	4933	12.87	76.65	10.48	74.21	4.32	3.39	0.24	16.22	1.62
6037405202	50.15	88.04	85-90%	Los Angeles	4850	11.24	75.51	13.26	76.85	2.82	2.21	0.76	16.93	0.43
6037405203	47.52	84.97	80-85%	Los Angeles	3638	16.55	69.85	13.61	68.99	9.76	0.69	0	19.93	0.63
6037405301	28.48	55.86	55-60%	Los Angeles	3469	13.06	73.8	13.14	67.92	10.03	2.94	0	17.21	1.9
6037405302	40.99	76.64	75-80%	Los Angeles	5433	12.33	74.18	13.49	67.72	9.94	2.19	0	18.79	1.36
6037405400	27.22	53.48	50-55%	Los Angeles	4950	9.92	74.16	15.92	75.66	12.4	1.76	0	8.91	1.27
6037405500	29.26	57.39	55-60%	Los Angeles	6596	15.72	70.95	13.33	61.83	13.72	0.77	0.91	21.36	1.41
6037405600	26.89	52.82	50-55%	Los Angeles	5553	13.43	69.62	16.95	62.7	13.96	2.38	0	20.58	0.38
6037405701	24.31	47.39	45-50%	Los Angeles	3862	11.96	79.83	8.21	69.06	14.71	0	0	15.3	0.93
6037405702	34.50	66.70	65-70%	Los Angeles	4957	11.86	76.24	11.9	55.98	13.88	7.83	0	18.01	4.3
6037405800	28.43	55.77	55-60%	Los Angeles	5825	11.45	76.52	12.03	68.03	15.18	1.13	0	9.84	5.82
6037405900	29.31	57.46	55-60%	Los Angeles	3951	10.78	73.6	15.62	64.84	18.88	2.48	0.66	11.52	1.62
6037406000	28.83	56.64	55-60%	Los Angeles	5206	10.93	74.26	14.81	60.07	23.74	1.61	0.25	12.04	2.29
6037406101	32.70	63.58	60-65%	Los Angeles	3105	13.56	72.5	13.95	60.42	21.13	3.61	1.93	9.82	3.09
6037406102	36.26	69.52	65-70%	Los Angeles	6167	15.4	76.52	8.08	70.86	14.92	3.92	0.24	8.5	1.56
6037406200	44.29	81.22	80-85%	Los Angeles	5811	11.62	68.35	20.03	60.47	14.46	3.94	0	19.43	1.7
6037406300	31.96	62.36	60-65%	Los Angeles	5829	9.13	73.01	17.86	37.9	20.24	1.66	0	33.67	6.52
6037406402	23.95	46.68	45-50%	Los Angeles	2043	10.62	65.05	24.33	53.55	30.1	1.76	0	9.1	5.48
6037406411	44.23	81.14	80-85%	Los Angeles	2002	12.59	72.03	15.38	57.44	18.48	2.15	0	18.43	3.5
6037406412	27.57	54.06	50-55%	Los Angeles	2123	9.51	69.01	21.48	50.45	21.62	1.65	0	25.44	0.85
6037406500	37.69	71.62	70-75%	Los Angeles	6655	11.5	76.8	11.71	57.55	9.59	3.59	0.5	23.56	5.21
6037406601	15.60	26.89	25-30%	Los Angeles	5550	12.2	73.3	14.5	58.43	17.28	3.48	0.47	18.67	1.68
6037406602	29.33	57.50	55-60%	Los Angeles	5198	10.08	76.22	13.7	65.7	11.33	0.31	0.15	22.14	0.37
6037406701	37.52	71.38	70-75%	Los Angeles	3082	8.6	77.9	13.5	58.6	8.57	8.66	0.16	22.58	1.43
6037406702	44.43	81.35	80-85%	Los Angeles	6375	11.06	73.82	15.12	57.25	12.85	2.34	0	25.11	2.45
6037406800	37.99	72.15	70-75%	Los Angeles	4866	8.98	74.48	16.54	57.71	10.93	2.38	0	27.87	1.11
6037406901	40.96	76.60	75-80%	Los Angeles	4773	15.32	72.62	12.07	77.16	3.42	2.05	0	16.36	1.01
6037406902	32.94	63.92	60-65%	Los Angeles	3584	12.64	69.98	17.38	72.85	5.22	1.14	0	18.5	2.29
6037407001	51.08	88.97	85-90%	Los Angeles	6284	11.11	78.26	10.63	92.03	1.54	0.38	0	5.49	0.56
6037407002	60.34	95.90	95-100% (highest scores)	Los Angeles	3436	10.1	73.49	16.41	84.46	3.17	0.76	0	10.83	0.79

6037407101	43.49	80.12	80-85%	Los Angeles	4883	13.5	74.56	11.94	87.08	3.97	0.7	0	8.25	0
6037407102	49.13	86.89	85-90%	Los Angeles	5710	13.06	76.6	10.33	78.53	2.01	1.02	0.51	16.43	1.51
6037407200	56.23	93.37	90-95%	Los Angeles	6910	12.53	75.14	12.33	86.98	4.66	0.03	0	8.34	0
6037407301	34.06	65.96	65-70%	Los Angeles	4949	7.44	77.41	15.15	76.72	4.71	1.01	0	16.12	1.43
6037407302	40.70	76.13	75-80%	Los Angeles	3503	13.16	72.85	13.99	85.67	1.37	1.66	0	11.31	0
6037407400	34.24	66.29	65-70%	Los Angeles	1977	12.14	73.75	14.11	45.17	11.23	5.92	0	29.94	7.74
6037407501	40.71	76.17	75-80%	Los Angeles	4257	12.64	76.02	11.35	78.44	4.6	1.29	0	15.57	0.09
6037407502	30.39	59.44	55-60%	Los Angeles	4170	9.04	83	7.96	84.65	4.6	2.57	0	7.48	0.7
6037407601	54.31	91.92	90-95%	Los Angeles	4608	11.63	83.09	5.27	83.75	2.56	1.41	0	12.28	0
6037407602	47.32	84.81	80-85%	Los Angeles	3993	7.46	78.56	13.97	80.12	2.38	2.4	0.68	13.43	1
6037407701	49.24	87.10	85-90%	Los Angeles	4903	10.12	77.18	12.71	83.09	2.75	0.31	0	13.85	0
6037407702	48.11	85.65	85-90%	Los Angeles	6744	14.32	73.13	12.54	76.3	7.24	0.62	0.64	14.72	0.47
6037407801	45.55	82.64	80-85%	Los Angeles	5727	12.5	74.66	12.83	68.92	3.11	1.05	0.14	24.18	2.6
6037407802	41.92	77.94	75-80%	Los Angeles	3476	10.7	76.27	13.03	77.24	3.97	1.29	1.21	16.2	0.09
6037407900	34.18	66.23	65-70%	Los Angeles	6082	11.92	73.38	14.7	66.9	5.05	5	0	22.58	0.48
6037408003	26.62	52.26	50-55%	Los Angeles	4577	11.71	71.75	16.54	61.02	4.98	6.23	0	27.59	0.17
6037408004	26.37	51.56	50-55%	Los Angeles	2493	13.6	74.77	11.63	44.52	6.62	10.71	0	36.5	1.64
6037408005	21.34	40.67	40-45%	Los Angeles	5161	10.42	75.72	13.85	37.57	12.23	5.44	0	40.24	4.51
6037408006	33.88	65.65	65-70%	Los Angeles	3344	11.93	73.83	14.23	36.57	3.53	3.98	0	53.95	1.97
6037408133	37.36	71.18	70-75%	Los Angeles	5203	14.4	74.01	11.59	53.32	6.13	4.15	0	35	1.4
6037408134	26.68	52.41	50-55%	Los Angeles	2760	8.19	71.2	20.62	30.25	10.51	5	0	50.4	3.84
6037408135	24.81	48.34	45-50%	Los Angeles	3882	11.67	72.8	15.53	37.17	8.5	4.56	0	48.66	1.11
6037408136	29.16	57.20	55-60%	Los Angeles	4224	9.64	74.93	15.44	52.65	8.03	6.2	0.45	31.87	0.8
6037408137	31.93	62.30	60-65%	Los Angeles	4277	11.29	75.45	13.26	45.15	8.3	7.55	0	37.83	1.17
6037408138	39.85	74.75	70-75%	Los Angeles	5432	13.51	72.94	13.55	89.12	4.71	0.74	0	4.6	0.83
6037408139	49.50	87.37	85-90%	Los Angeles	4536	12.7	74.32	12.99	94.16	3.06	0.33	0	2.45	0
6037408140	52.91	90.81	90-95%	Los Angeles	3793	9.75	81.47	8.78	91.12	2.16	0.82	0	5.91	0
6037408141	34.83	67.30	65-70%	Los Angeles	5366	12.43	75.48	12.09	80.67	0.89	0.11	0	18.32	0
6037408202	54.57	92.16	90-95%	Los Angeles	2015	11.41	75.63	12.95	80.79	6.7	0	0	10.37	2.13
6037408211	41.60	77.48	75-80%	Los Angeles	6381	15.44	68.44	16.13	28.99	4.22	1.18	0	63.99	1.63
6037408212	29.58	57.97	55-60%	Los Angeles	5042	13.03	67.26	19.71	29.69	7.3	3.47	0.02	58.01	1.51
6037408301	62.47	96.79	95-100% (highest scores)	Los Angeles	5569	14.49	73.07	12.44	88.49	1.63	0.54	0	9.34	0
6037408302	40.18	75.28	75-80%	Los Angeles	3836	10.79	73.46	15.75	75.55	7.14	0	0	16.03	1.28
6037408303	34.93	67.45	65-70%	Los Angeles	4183	7.32	72.17	20.51	67.46	13.51	1.22	0	17.81	0
6037408401	54.19	91.79	90-95%	Los Angeles	4389	6.86	78.06	15.08	62	9.5	2.57	0	25.75	0.18
6037408402	34.35	66.45	65-70%	Los Angeles	6646	8.85	71.8	19.35	61.39	16.25	1.02	0.29	21.05	0
6037408501	59.49	95.37	95-100% (highest scores)	Los Angeles	3050	11.48	75.08	13.44	70.92	4.92	0.46	0	23.48	0.23
6037408503	13.51	21.72	20-25%	Los Angeles	6673	10.7	67.09	22.21	33.88	16.87	1.71	0.33	44.82	2.38
6037408504	38.43	72.84	70-75%	Los Angeles	5193	12.63	73.66	13.71	54	10.98	0.19	0	33.62	1.21
6037408505	26.53	52.05	50-55%	Los Angeles	2653	10.4	68.6	21	46.44	17.49	0.72	0.83	34.53	0
6037408623	32.90	63.83	60-65%	Los Angeles	3268	8.78	64.9	26.32	30.69	16.06	2.66	0	47.67	2.91
6037408624	25.98	50.93	50-55%	Los Angeles	2958	9.33	69.41	21.26	24.98	8.25	0.03	0	65.75	0.98
6037408625	26.10	51.10	50-55%	Los Angeles	4214	13.46	67.85	18.7	31.87	14.74	0	0.33	52.23	0.83
6037408626	19.40	35.94	35-40%	Los Angeles	4037	8	72.36	19.64	21.8	6.07	2.08	0	70.05	0
6037408627	10.02	13.00	10-15%	Los Angeles	3076	9.53	65.8	24.67	19.73	11.22	1.33	0	66.15	1.56
6037408628	22.62	43.51	40-45%	Los Angeles	5177	8.04	67.9	24.07	20.71	8.56	1.27	0	67.36	2.11
6037408629	16.75	29.80	25-30%	Los Angeles	3012	7.74	70.78	21.48	23.71	13.25	2.06	0.2	57.57	3.22
6037408630	39.47	74.10	70-75%	Los Angeles	2510	11.91	74.22	13.86	75.66	4.26	0	0	17.45	2.63
6037408631	40.62	76.07	75-80%	Los Angeles	5214	10.18	76.68	13.14	58.78	8.4	0.15	0	31.66	1
6037408703	14.60	24.56	20-25%	Los Angeles	6545	7	75.91	17.1	9.53	6.39	0.86	0	81.93	1.3
6037408704	22.62	43.52	40-45%	Los Angeles	3311	9.21	62.52	28.27	26.16	7.55	1.9	0	63.09	1.3
6037408705	20.59	39.04	35-40%	Los Angeles	5625	10.68	70.52	18.79	23.52	11.77	0	0	64.2	0.52
6037408706	11.26	16.09	15-20%	Los Angeles	1835	8.01	69.59	22.4	16.78	12.1	0.38	7.41	60.76	2.56
6037408722	15.10	25.77	25-30%	Los Angeles	4313	7.91	76.4	15.7	26.43	12.1	0.19	0.23	60.65	0.39
6037408723	18.11	32.98	30-35%	Los Angeles	2975	8.03	74.18	17.78	25.88	10.69	2.35	0.17	57.34	3.56
6037408724	28.19	55.28	55-60%	Los Angeles	5542	22.07	73.26	4.67	56.35	2.51	1.39	0	38.47	1.28
6037408800	62.58	96.85	95-100% (highest scores)	Los Angeles	4387	10.96	82.7	6.34	68.27	14.36	6.5	0	6.88	3.99
6037430002	35.37	68.09	65-70%	Los Angeles	6522	10.03	71.36	18.61	43.93	26.74	7.24	0	21.47	0.63

6037430003	11.16	15.82	15-20%	Los Angeles	4971	9.64	70.89	19.47	33.19	36.29	3.38	0.26	20.68	6.2
6037430101	41.84	77.81	75-80%	Los Angeles	5382	9.74	66.63	23.63	50.5	24.88	5.96	0.33	15.92	2.4
6037430102	37.12	70.76	70-75%	Los Angeles	4684	6.49	77.95	15.56	75.19	9.35	4.61	1.71	8.9	0.23
6037430200	10.06	13.07	10-15%	Los Angeles	1026	7.5	56.92	35.58	12.09	55.46	0.78	0	30.41	1.27
6037430301	11.37	16.29	15-20%	Los Angeles	4319	9.68	68.81	21.51	17.81	62.95	4.12	0	11.99	3.13
6037430302	17.12	30.61	30-35%	Los Angeles	5339	9.76	72.77	17.48	28.71	53.4	1.57	0	9.16	7.15
6037430400	18.75	34.62	30-35%	Los Angeles	4642	7.93	70.44	21.63	6.79	25.66	3.08	0	62.41	2.07
6037430501	8.95	10.53	10-15%	Los Angeles	4030	10.05	61.64	28.31	5.98	68.26	1.17	0.2	18.41	5.98
6037430502	10.78	14.91	10-15%	Los Angeles	6902	10.43	69.83	19.73	19.28	65.18	0.52	0	12.33	2.68
6037430600	16.61	29.35	25-30%	Los Angeles	4553	12.63	66.68	20.69	4.88	31.91	1.74	0	55.28	6.19
6037430701	17.26	30.93	30-35%	Los Angeles	5846	12.97	70.77	16.27	15.51	28.04	1.44	0	52.51	2.5
6037430721	16.70	29.63	25-30%	Los Angeles	3963	12.39	67.95	19.66	15.09	28.41	2.75	0	50.82	2.93
6037430723	13.84	22.57	20-25%	Los Angeles	4365	12.05	77.46	10.49	10.95	26.39	3.37	0	55.92	3.37
6037430724	18.04	32.80	30-35%	Los Angeles	4723	12.56	73.2	14.25	16.11	17.36	1.59	0	63.22	1.72
6037430801	23.48	45.52	45-50%	Los Angeles	6978	10.75	80.58	8.67	7.01	16.77	1.52	0	69.62	5.09
6037430802	19.26	35.75	35-40%	Los Angeles	4586	9.86	70.56	19.58	10.14	13.08	0.33	0.68	74.42	1.35
6037430803	18.54	34.04	30-35%	Los Angeles	5397	9.69	65.5	24.81	13.47	24.27	0	0.26	59.92	2.08
6037430901	37.30	70.97	70-75%	Los Angeles	4517	10.96	76.13	12.91	48.73	21.41	8.63	0	18.84	2.39
6037430902	31.45	61.36	60-65%	Los Angeles	4539	10.49	75.41	14.1	38.82	24.01	4.3	0	30.85	2.03
6037431001	32.87	63.77	60-65%	Los Angeles	7669	13.51	76.32	10.17	52.99	29.77	4.51	0	9.41	3.31
6037431002	23.49	45.59	45-50%	Los Angeles	3165	10.62	67.42	21.96	27.01	46.19	3.92	0	18.99	3.89
6037431100	39.70	74.51	70-75%	Los Angeles	6758	11.26	81.44	7.3	58.23	16.14	9	0	15.52	1.11
6037431200	39.97	74.96	70-75%	Los Angeles	6399	11.49	77.2	11.31	68.28	9.95	9.35	0	10.77	1.66
6037431300	21.12	40.23	40-45%	Los Angeles	2689	13.2	71.66	15.14	37.26	33.4	0.82	0.19	24.14	4.2
6037431400	30.98	60.59	60-65%	Los Angeles	4202	9.95	69.9	20.16	30.13	19.18	0.74	0.38	46.74	2.83
6037431501	25.21	49.21	45-50%	Los Angeles	4480	11.34	66.83	21.83	33.59	17.01	3.21	0.22	44.78	1.18
6037431502	27.17	53.38	50-55%	Los Angeles	4273	11.87	72.76	15.38	25.65	24.81	0.98	0.09	45.52	2.95
6037431600	10.81	15.00	15-20%	Los Angeles	4190	6.3	66.87	26.83	8.35	20.29	1.17	0.53	66.21	3.46
6037431700	15.19	26.00	25-30%	Los Angeles	6000	5.17	69.87	24.97	8.12	15.27	1.42	0	73.6	1.6
6037431800	17.60	31.83	30-35%	Los Angeles	5655	9.3	67	23.7	13.76	21.66	1.96	0	59.94	2.67
6037431900	26.55	52.11	50-55%	Los Angeles	4400	11.5	73.02	15.48	19.36	18.07	2.68	0	58.27	1.61
6037432000	24.16	47.09	45-50%	Los Angeles	7601	10.88	67.5	21.62	19.35	16.06	0.39	0.36	62.79	1.05
6037432101	27.04	53.14	50-55%	Los Angeles	4103	11.46	68.93	19.62	14.65	18.52	0.02	1	63.56	2.24
6037432102	23.03	44.58	40-45%	Los Angeles	5951	12.03	71.57	16.4	19.86	14.1	0.67	0.35	63.02	2
6037432201	39.87	74.79	70-75%	Los Angeles	4491	11.47	68.23	20.31	13.16	10.58	0.22	0	74.33	1.71
6037432202	46.80	84.18	80-85%	Los Angeles	4471	11.23	68.87	19.91	33.73	6.84	0.47	0.22	58.17	0.56
6037432300	53.91	91.55	90-95%	Los Angeles	4350	13.68	73.06	13.26	46.53	7.68	0	0.48	45.11	0.21
6037432401	43.27	79.87	75-80%	Los Angeles	3705	6.5	76.44	17.06	54.49	5.21	0.16	0	40.03	0.11
6037432402	46.32	83.69	80-85%	Los Angeles	6938	13.03	71.01	15.96	52.91	8.4	1.18	0	37.23	0.27
6037432500	52.03	90.09	90-95%	Los Angeles	8180	6.5	75.54	17.96	59.74	6.91	0.17	0	32.31	0.87
6037432601	50.06	87.96	85-90%	Los Angeles	7210	8.25	77.84	13.91	55.19	3.79	1.39	0	38.46	1.18
6037432602	47.24	84.69	80-85%	Los Angeles	4852	9.65	77.78	12.57	54.45	1.61	0	0	42.46	1.48
6037432700	66.56	98.29	95-100% (highest scores)	Los Angeles	5779	14.38	73.21	12.41	81.48	1.96	0	0	16.56	0
6037432801	61.55	96.42	95-100% (highest scores)	Los Angeles	2797	8.97	56.85	34.18	49.48	2.79	0.18	0	47.55	0
6037432802	64.31	97.57	95-100% (highest scores)	Los Angeles	5077	17.18	75.87	6.95	72.52	1.73	0	0	24.88	0.87
6037432901	46.55	83.91	80-85%	Los Angeles	3727	8.29	76.68	15.03	26.91	3.6	1.21	0.4	66.33	1.56
6037432902	36.80	70.31	70-75%	Los Angeles	3312	5.13	70.5	24.37	29.56	8.21	0.21	0.57	57.49	3.96
6037433101	76.26	99.79	95-100% (highest scores)	Los Angeles	2464	7.47	69.89	22.65	48.3	2.44	0.16	0.16	48.42	0.53
6037433102	66.78	98.37	95-100% (highest scores)	Los Angeles	5348	9.12	75.8	15.07	56.69	0.71	0	0	42.59	0
6037433200	64.58	97.66	95-100% (highest scores)	Los Angeles	6246	11.08	73.78	15.15	62.09	6.61	0.74	0	29.6	0.96
6037433302	57.03	93.91	90-95%	Los Angeles	1530	13.53	72.61	13.86	78.76	2.03	3.86	0	14.97	0.39
6037433304	48.81	86.52	85-90%	Los Angeles	5063	11.16	75.49	13.35	69.09	3.69	1.05	0	25.64	0.53
6037433305	52.21	90.28	90-95%	Los Angeles	4582	9.38	80.6	10.02	64.32	1.22	0.39	0	33.83	0.24
6037433306	51.84	89.83	85-90%	Los Angeles	3136	9.18	78.7	12.12	68.24	3.13	0.13	0	28.51	0
6037433307	54.32	91.94	90-95%	Los Angeles	3193	11.56	77.48	10.96	62.51	1.13	0.19	4.04	31.38	0.75
6037433401	58.86	95.03	95-100% (highest scores)	Los Angeles	3405	11.54	78.27	10.19	69.81	2.26	0.35	0	27.2	0.38
6037433402	55.50	92.91	90-95%	Los Angeles	4713	14.05	74.79	11.16	76.28	3.44	0.25	0.79	16.52	2.72
6037433403	51.36	89.30	85-90%	Los Angeles	4882	18.87	74.21	6.92	80.17	0.57	0	0	19.25	0

6037433501	76.91	99.85	95-100% (highest scores)	Los Angeles	1949	10.98	75.42	13.6	93.89	0.72	0	0	5.39	0
6037433503	57.51	94.20	90-95%	Los Angeles	3269	14.22	76.08	9.7	75.68	1.35	0	0	22.97	0
6037433504	68.72	98.81	95-100% (highest scores)	Los Angeles	4802	16.14	74.97	8.89	72.16	0.85	0.31	0	26.17	0.5
6037433601	49.70	87.53	85-90%	Los Angeles	5066	10.8	70.77	18.44	32.21	2.41	0	0	65.38	0
6037433602	51.74	89.74	85-90%	Los Angeles	2896	11.19	70.2	18.61	32.63	3.21	0	0	63.95	0.21
6037433700	63.87	97.44	95-100% (highest scores)	Los Angeles	3684	13.06	71.72	15.23	84.99	1.63	0	0.27	12.65	0.46
6037433801	67.02	98.41	95-100% (highest scores)	Los Angeles	5944	18.35	72.88	8.77	89.8	1.77	0.19	0	8.24	0
6037433802	54.53	92.12	90-95%	Los Angeles	3362	10.02	73.53	16.45	71.3	8.6	1.25	0.3	18.56	0
6037433901	61.83	96.50	95-100% (highest scores)	Los Angeles	6032	16.86	77.34	5.8	78.03	0.88	0.71	0.1	20.17	0.1
6037433902	46.09	83.35	80-85%	Los Angeles	3284	11.42	70.77	17.81	83.31	2.89	0	0.61	13.19	0
6037434001	62.71	96.95	95-100% (highest scores)	Los Angeles	4410	14.22	77.17	8.62	80.11	3.11	0.14	0.39	16.26	0
6037434003	63.13	97.11	95-100% (highest scores)	Los Angeles	4717	10.28	78.16	11.55	81.96	3.03	0.11	0	14.12	0.78
6037434004	70.22	99.14	95-100% (highest scores)	Los Angeles	3039	11.62	79.73	8.65	92.3	1.32	0.16	0	6.22	0
6037460000	10.93	15.31	15-20%	Los Angeles	4421	9.32	65.55	25.13	16.13	56.23	1.04	0	23.41	3.19
6037460100	15.23	26.10	25-30%	Los Angeles	6196	8.05	70.08	21.87	14.57	56.15	11.62	0.32	8.76	8.57
6037460200	11.49	16.60	15-20%	Los Angeles	5861	10.75	69.2	20.05	19.16	34.41	32.81	0	9.02	4.59
6037460301	21.57	41.24	40-45%	Los Angeles	4845	11.06	72.78	16.16	16.24	37.98	35.89	0.45	6.09	3.34
6037460302	27.23	53.50	50-55%	Los Angeles	4221	13.53	68.44	18.03	47.69	19.24	27.62	0	3.32	2.13
6037460401	22.25	42.65	40-45%	Los Angeles	985	15.53	68.32	16.14	40.51	18.27	28.73	0	5.59	6.9
6037460501	7.76	8.09	5-10%	Los Angeles	5614	11.22	67.58	21.2	7	51.78	0	0	36.69	4.52
6037460502	6.81	6.43	5-10%	Los Angeles	4277	12.06	72.22	15.71	12.46	46.88	0.3	0	36.75	3.6
6037460600	6.75	6.28	5-10%	Los Angeles	4416	10.71	72.08	17.21	7.02	65.99	0	0	22.37	4.62
6037460700	9.31	11.20	10-15%	Los Angeles	5139	10.24	70.81	18.95	11.97	55.24	2.74	0	25.84	4.2
6037460800	12.09	18.17	15-20%	Los Angeles	3103	9.51	60.46	30.04	10.92	66.32	6.77	0.52	14.41	1.06
6037460900	34.16	66.16	65-70%	Los Angeles	6731	14.96	72.37	12.67	59.04	13.47	15.02	0	10.04	2.42
6037461000	30.02	58.71	55-60%	Los Angeles	6249	10.34	75.56	14.1	49.7	8.98	35.03	0.29	3.73	2.27
6037461100	22.31	42.75	40-45%	Los Angeles	5419	13.38	70.49	16.13	44.05	28.18	21.59	0	2.97	3.21
6037461200	15.51	26.71	25-30%	Los Angeles	4535	7.96	70.47	21.57	17.11	62.82	11.25	0.18	5.03	3.62
6037461300	23.10	44.77	40-45%	Los Angeles	6840	10.72	69.42	19.87	17.62	61.08	3.67	0.58	11.52	5.53
6037461400	22.98	44.43	40-45%	Los Angeles	3119	12.18	71.88	15.93	30.94	47.39	5.1	0	8.02	8.56
6037461501	21.19	40.38	40-45%	Los Angeles	3971	13.09	72.8	14.1	48.35	23.6	15.76	0	10.17	2.12
6037461502	28.12	55.23	55-60%	Los Angeles	6423	12.16	69.98	17.86	53.56	21.36	14.98	0	7.82	2.29
6037461600	39.13	73.66	70-75%	Los Angeles	6058	10.66	78.08	11.26	56.75	12.97	13.85	0.63	11.59	4.21
6037461700	28.91	56.77	55-60%	Los Angeles	1526	10.55	56.23	33.22	16.12	61.4	10.22	0	9.83	2.42
6037461901	35.65	68.63	65-70%	Los Angeles	5051	7.42	83.49	9.09	57.28	17.86	13.4	0.1	8.3	3.07
6037461902	24.42	47.64	45-50%	Los Angeles	1801	2.11	82.84	15.05	12.38	38.03	12.88	0	30.04	6.66
6037462001	26.50	51.99	50-55%	Los Angeles	4460	16.3	76.46	7.24	74.13	9.1	8.68	0	7.08	1.01
6037462002	33.71	65.36	65-70%	Los Angeles	4043	12.47	79.84	7.69	71.48	10.14	14.2	0.69	1.66	1.83
6037462100	27.28	53.58	50-55%	Los Angeles	5748	11.88	76.79	11.33	61.01	20.41	8.04	0	7.86	2.68
6037462201	37.45	71.29	70-75%	Los Angeles	3941	11.75	65.03	23.22	33.77	37.27	9.16	0	16.32	3.48
6037462202	31.22	61.09	60-65%	Los Angeles	2775	8.65	79.75	11.6	15.46	42.02	8	0	30.59	3.93
6037462301	31.32	61.22	60-65%	Los Angeles	5265	14.61	74.97	10.43	61.58	20.19	8.66	0.17	7.26	2.15
6037462302	28.18	55.27	55-60%	Los Angeles	3213	10.21	79.05	10.74	31.93	32.46	5.1	0	26.8	3.7
6037462400	17.98	32.70	30-35%	Los Angeles	3944	10.32	72.59	17.09	29.67	52.79	2.33	0.84	9.38	4.99
6037462500	16.30	28.57	25-30%	Los Angeles	6146	14.07	65.54	20.39	20.09	53.12	4.12	0	18.19	4.47
6037462600	9.64	12.12	10-15%	Los Angeles	2152	10.83	68.03	21.14	24.81	51.58	7.34	0	13.8	2.46
6037462700	19.75	36.89	35-40%	Los Angeles	5413	13.34	72.29	14.37	41.38	29.1	4.86	0	20.47	4.19
6037462800	25.14	49.04	45-50%	Los Angeles	2827	13.8	73.68	12.52	32.9	38.34	8.7	0	15.46	4.6
6037462900	14.19	23.49	20-25%	Los Angeles	3797	13.62	70.13	16.25	33.74	45.9	2.98	0	13.91	3.48
6037463000	17.52	31.61	30-35%	Los Angeles	2665	14.45	68.86	16.7	15.31	43.19	5.4	0	29.76	6.34
6037463101	23.69	45.84	45-50%	Los Angeles	2373	9.36	73.66	16.98	31.44	28.32	4.47	0	31.73	4.05
6037463102	32.61	63.45	60-65%	Los Angeles	3878	14.05	68.31	17.64	38.53	24.16	2.37	0	33.16	1.78
6037463200	23.65	45.73	45-50%	Los Angeles	3563	8.17	68.93	22.9	22.99	40.08	5.73	0	27.9	3.31
6037463300	13.43	21.53	20-25%	Los Angeles	1970	9.95	70	20.05	20.51	46.45	4.72	0	26.4	1.93
6037463400	16.92	30.27	30-35%	Los Angeles	5787	8.81	76.26	14.93	21.63	39.33	6.55	0.28	27.58	4.63
6037463500	12.79	19.93	15-20%	Los Angeles	5982	10.2	80.44	9.36	14.51	49.58	5.37	0.33	26.85	3.36
6037463601	21.41	40.90	40-45%	Los Angeles	5988	7.95	78.69	13.36	20.62	42.87	2.42	0	31.02	3.06
6037463602	18.36	33.64	30-35%	Los Angeles	6057	10.71	77.08	12.2	17.34	37.92	9.33	0	31.98	3.43

6037463700	20.85	39.69	**35-40%**	Los Angeles	3138	7.07	70.11	22.82	12.52	61.47	6.05	0	13.8	6.15
6037463800	6.58	5.91	**5-10%**	Los Angeles	4066	15.94	60.77	23.29	11.71	62.15	2.34	0	16.75	7.06
6037463900	21.30	40.53	**40-45%**	Los Angeles	3290	4.86	60.18	34.95	14.68	60.43	9.06	0.82	11.58	3.43
6037464000	18.80	34.75	**30-35%**	Los Angeles	5623	10.42	71.46	18.12	15.83	45.6	9	0	24.26	5.32
6037464100	8.07	8.69	**5-10%**	Los Angeles	7121	9.41	69.18	21.42	6.67	30.74	0.79	0	58.83	2.98
6037464200	8.72	10.00	**5-10%**	Los Angeles	6073	9.85	70.34	19.81	5.76	25.47	3.13	0	62.85	2.78
6037480002	12.19	18.43	**15-20%**	Los Angeles	3623	9.85	67.54	22.61	20.23	25.64	1.9	0	50.32	1.9
6037480011	21.77	41.70	**40-45%**	Los Angeles	5466	13.92	74	12.07	36.17	14.87	0.51	0	45.96	2.49
6037480012	15.12	25.81	**25-30%**	Los Angeles	4975	14.17	68.98	16.84	19.4	18.13	1.03	0	60.64	0.8
6037480101	24.83	48.37	**45-50%**	Los Angeles	3731	9.57	72.15	18.28	10.48	11.87	0.08	0.4	73.6	3.56
6037480102	28.91	56.81	**55-60%**	Los Angeles	4487	9.65	71.7	18.65	21.35	15.76	2.01	0	57.92	2.96
6037480201	12.63	19.52	**15-20%**	Los Angeles	3787	9.14	69.03	21.84	24	33.11	1.29	0	38.76	2.83
6037480202	20.79	39.52	**35-40%**	Los Angeles	2553	16.73	65.33	17.94	28.67	21.43	0.82	0.63	43.52	4.94
6037480302	26.25	51.39	**50-55%**	Los Angeles	4672	7.36	76.09	16.55	35.55	15.88	0.88	2.12	41.78	3.79
6037480303	35.85	68.91	**65-70%**	Los Angeles	4103	11.97	75.68	12.36	44.31	5.63	4.75	0	44.41	0.9
6037480304	35.55	68.48	**65-70%**	Los Angeles	4506	6.84	78.25	14.91	34.35	8.08	1.69	0.51	54.26	1.11
6037480400	21.33	40.62	**40-45%**	Los Angeles	5538	10.91	68.36	20.73	28.69	14.12	3.02	0.45	48.52	5.2
6037480500	8.82	10.26	**10-15%**	Los Angeles	5108	10.36	73.06	16.58	15.66	51.35	0.06	0	28.13	4.8
6037480600	18.95	35.01	**35-40%**	Los Angeles	8038	14.87	73.49	11.64	19.4	47.74	5.87	0.02	21.61	5.36
6037480702	7.10	6.93	**5-10%**	Los Angeles	4284	12.79	67.74	19.47	16.69	33.43	5	0	42.55	2.33
6037480703	11.37	16.31	**15-20%**	Los Angeles	3612	15.09	72.43	12.49	20.13	38.68	1.72	0	35.6	3.88
6037480704	16.60	29.32	**25-30%**	Los Angeles	4619	13.77	75.28	10.95	20.44	36.09	0.97	0.95	32.43	9.11
6037480802	31.04	60.73	**60-65%**	Los Angeles	3162	6.96	70.02	23.02	53.23	6.01	0.16	0	37.19	3.42
6037480803	37.69	71.63	**70-75%**	Los Angeles	3699	9.54	75.72	14.73	60.04	11	0.78	0.3	23.06	4.81
6037480804	30.96	60.54	**60-65%**	Los Angeles	4892	14.62	73.77	11.61	38.72	9.32	3.21	0	45.85	2.9
6037480901	36.35	69.68	**65-70%**	Los Angeles	5407	8.05	77.73	14.22	39.17	6.55	3.64	0	49.69	0.94
6037480902	42.01	78.08	**75-80%**	Los Angeles	4109	10.98	78.32	10.71	43.98	4.6	1.73	0.46	47.55	1.68
6037480903	39.57	74.23	**70-75%**	Los Angeles	3248	10.34	71.18	18.47	26.32	6	0.86	0.18	64.41	2.22
6037481001	41.75	77.71	**75-80%**	Los Angeles	4369	5.97	63.45	30.58	27.15	12.15	0.41	0	59.49	0.8
6037481002	37.35	71.14	**70-75%**	Los Angeles	5646	11.19	73.91	14.9	36.01	9.78	0.25	0	53	0.97
6037481101	33.14	64.27	**60-65%**	Los Angeles	4513	8.71	72.86	18.44	40.02	11.12	1.6	0.24	46.4	0.62
6037481102	32.97	64.02	**60-65%**	Los Angeles	4000	15.9	71.68	12.43	19.48	12.05	1.2	0	65.28	2
6037481103	39.24	73.81	**70-75%**	Los Angeles	4926	6.25	75.46	18.29	42.2	6.09	0.16	0	51.32	0.22
6037481201	36.44	69.79	**65-70%**	Los Angeles	3910	9.13	78.77	12.1	28.82	7.01	0.33	0	62.99	0.84
6037481202	38.11	72.33	**70-75%**	Los Angeles	6188	9.65	73.93	16.42	32.69	8.26	0.11	0	57.34	1.6
6037481300	43.14	79.72	**75-80%**	Los Angeles	3299	6.61	76.3	17.1	28.46	3.82	0.03	0.24	67.44	0
6037481401	38.32	72.63	**70-75%**	Los Angeles	6267	8.27	79.51	12.22	17.12	5.49	0.05	0.19	75.84	1.31
6037481402	37.64	71.55	**70-75%**	Los Angeles	6598	6.06	72.67	21.26	20.02	7.74	0.08	0	70.87	1.29
6037481500	44.82	81.77	**80-85%**	Los Angeles	4489	5.52	67.34	27.13	16.44	5.21	1.29	0	75.74	1.31
6037481603	41.70	77.65	**75-80%**	Los Angeles	3486	13.28	73.41	13.31	18.5	4.04	4.82	0.89	70.97	0.77
6037481604	40.15	75.23	**75-80%**	Los Angeles	3701	8.02	73.49	18.48	31.83	9.7	1	0	57.09	0.38
6037481605	34.13	66.10	**65-70%**	Los Angeles	2831	7.74	72.41	19.85	31.58	4.7	0	0.32	62.81	0.6
6037481606	35.78	68.82	**65-70%**	Los Angeles	5013	9.77	73.25	16.98	24	2.71	5.57	0	67.72	0
6037481711	22.79	43.94	**40-45%**	Los Angeles	4246	6.62	69.71	23.67	9.63	2.87	0.35	0	86.79	0.35
6037481712	24.06	46.86	**45-50%**	Los Angeles	5329	6.51	74.27	19.22	19.01	0.51	0	0	80	0.49
6037481713	16.78	29.89	**25-30%**	Los Angeles	2736	11.7	70.91	17.4	20.61	1.97	0	0	77.08	0.33
6037481714	29.09	57.01	**55-60%**	Los Angeles	2739	5.48	69.73	24.79	6.57	3.72	0.4	0	87.55	1.75
6037481800	16.33	28.63	**25-30%**	Los Angeles	2558	7.54	64.93	27.52	21.46	14.5	0.23	0	61.42	2.38
6037481901	32.31	62.95	**60-65%**	Los Angeles	5775	8.48	71.64	19.88	50.49	14.11	0.81	0.09	34.01	0.48
6037481902	28.04	55.08	**55-60%**	Los Angeles	3443	10.57	70.08	19.34	54.46	9.27	3.6	0.49	31.77	0.41
6037482001	25.18	49.16	**45-50%**	Los Angeles	2650	7.02	59.51	33.47	14.19	4.11	0	0	80.38	1.32
6037482002	30.64	59.93	**55-60%**	Los Angeles	6760	11.26	69.48	19.26	31.67	4.05	1.43	0.9	61.23	0.71
6037482101	34.97	67.55	**65-70%**	Los Angeles	4750	8.42	69.22	22.36	24.74	5.37	0.29	0	68.9	0.69
6037482102	31.23	61.13	**60-65%**	Los Angeles	2943	10.81	67.48	21.71	31.26	6.46	0.51	0	58.21	3.57
6037482201	26.42	51.71	**50-55%**	Los Angeles	4076	8.83	71.32	19.85	26.01	2.82	0.02	0	70.14	1.01
6037482202	25.07	48.85	**45-50%**	Los Angeles	5087	12.29	72.52	15.2	24.49	1.81	0.63	0.51	72.11	0.45
6037482301	47.88	85.34	**85-90%**	Los Angeles	4941	8.62	75.11	16.27	19.09	1.86	0.51	0	78.12	0.43
6037482303	39.67	74.42	**70-75%**	Los Angeles	6156	15.01	71.25	13.74	30.82	2.58	0	0	66.39	0.21

6037482304	35.85	68.90	**65-70%**	Los Angeles	3216	14.65	73.73	11.63	44.59	2.49	1.62	0	49.5	1.8
6037482401	39.40	73.97	**70-75%**	Los Angeles	3670	11.25	71.8	16.95	42.34	2.56	0	0	54.66	0.44
6037482402	49.70	87.54	**85-90%**	Los Angeles	7566	8.74	75.09	16.18	45.47	4.14	0.12	0	50.17	0.11
6037482502	39.22	73.79	**70-75%**	Los Angeles	3310	8.16	77.1	14.74	20.54	0.97	0.48	0	77.34	0.66
6037482503	39.45	74.07	**70-75%**	Los Angeles	4293	10.16	76.43	13.42	31.38	1.98	0.98	2.17	59.96	3.54
6037482521	29.58	57.99	**55-60%**	Los Angeles	5842	8.59	71.82	19.58	38.1	5.41	0.51	0.17	54.76	1.04
6037482522	39.76	74.62	**70-75%**	Los Angeles	4478	8.15	71.88	19.96	46.16	6.86	0.38	0.16	44.42	2.03
6037482600	27.03	53.10	**50-55%**	Los Angeles	6262	5.49	70.42	24.08	28.9	7.31	0	2.38	60.59	0.81
6037482701	33.35	64.65	**60-65%**	Los Angeles	4323	10.76	69.4	19.85	60.98	3.03	0.02	0	35.74	0.23
6037482702	20.76	39.41	**35-40%**	Los Angeles	2373	7.59	68.02	24.4	42.52	7.5	1.14	0.17	45.98	2.7
6037482800	32.27	62.88	**60-65%**	Los Angeles	4524	13.04	66.27	20.69	40.05	4.8	0.2	0.82	51.79	2.34
6037500100	14.29	23.79	**20-25%**	Los Angeles	4840	11.71	68.14	20.14	38.7	43.31	0.1	0.52	16.43	0.95
6037500201	12.80	19.94	**15-20%**	Los Angeles	7267	8.86	70.46	20.68	30.43	57.38	0.39	0	7.55	4.25
6037500202	18.46	33.81	**30-35%**	Los Angeles	4988	9.98	67.88	22.13	45.73	30.23	0.66	0.08	20.83	2.47
6037500300	39.89	74.80	**70-75%**	Los Angeles	2973	9.42	67.31	23.28	54.12	28.19	0	0	15.78	1.92
6037500402	56.30	93.42	**90-95%**	Los Angeles	4856	12.54	77.45	10.01	97.59	1.85	0	0	0	0.56
6037500403	44.73	81.68	**80-85%**	Los Angeles	3829	8.88	74.8	16.32	86.05	5.3	0	0.6	7.78	0.26
6037500404	45.43	82.49	**80-85%**	Los Angeles	4551	8.2	74.97	16.83	82.14	9.27	0.53	0	6.28	1.78
6037500500	38.19	72.45	**70-75%**	Los Angeles	2703	7.21	73.55	19.24	86.09	5.18	0.37	0	8.36	0
6037500600	51.52	89.49	**85-90%**	Los Angeles	4912	8.65	76.06	15.29	96.4	1.57	0	0	2.04	0
6037500700	48.22	85.78	**85-90%**	Los Angeles	7150	10.78	75.36	13.86	93.24	4.41	0.38	0	1.09	0.88
6037500800	39.50	74.17	**70-75%**	Los Angeles	5362	11.86	74.8	13.33	91.07	5.86	1.08	0.56	1.16	0.28
6037500900	37.89	71.92	**70-75%**	Los Angeles	6363	11.44	74.07	14.49	90.27	3.3	1.63	0.2	4.18	0.41
6037501001	43.94	80.74	**80-85%**	Los Angeles	3046	11.62	75.05	13.33	92.38	6.17	0	0.69	0.53	0.23
6037501002	35.52	68.42	**65-70%**	Los Angeles	5013	12.23	77.14	10.63	84.92	12.37	0.52	0.3	1.32	0.58
6037501200	38.97	73.41	**70-75%**	Los Angeles	4864	12.99	73.48	13.53	73.01	15.15	0.25	0.68	9	1.91
6037501300	29.78	58.26	**55-60%**	Los Angeles	7154	13.42	74.35	12.23	73.71	21.02	1.33	0	2.39	1.55
6037501400	47.20	84.64	**80-85%**	Los Angeles	3669	11.42	80.73	7.85	82.28	11.28	1.61	1.83	2.29	0.71
6037501501	17.77	32.16	**30-35%**	Los Angeles	2272	7.92	70.64	21.43	55.68	32.79	0	0	9.77	1.76
6037501503	27.58	54.07	**50-55%**	Los Angeles	5280	11.72	78.81	9.47	72.99	20.78	0.64	1.5	2.01	2.08
6037501504	34.06	65.92	**65-70%**	Los Angeles	3369	12.91	67.62	19.47	77.53	13.06	0.92	0.39	6	2.11
6037501600	35.63	68.62	**65-70%**	Los Angeles	7769	8.04	76.33	15.63	55.66	29.73	1.63	0.15	7.8	5.02
6037501700	28.80	56.58	**55-60%**	Los Angeles	3425	16.76	69.31	13.93	57.66	38.04	0.26	0	4.03	0
6037501802	27.76	54.43	**50-55%**	Los Angeles	3311	13.38	72.61	14.01	76.29	17.61	3.93	0	1.12	1.06
6037501803	47.87	85.31	**85-90%**	Los Angeles	4427	14.75	78.79	6.46	87.31	8.22	0.5	0.38	1.02	2.58
6037501804	47.00	84.47	**80-85%**	Los Angeles	2175	20.09	68.69	11.22	80.28	13.56	1.56	0	3.17	1.43
6037501900	29.96	58.59	**55-60%**	Los Angeles	4153	13.89	73.18	12.93	75.63	18.49	1.9	0	1.64	2.34
6037502003	38.97	73.39	**70-75%**	Los Angeles	2634	9.98	80.68	9.34	82.99	11.66	0.61	0	1.33	3.42
6037502004	46.42	83.77	**80-85%**	Los Angeles	4251	8.42	79.58	12	86.03	5.34	1.32	0	4.59	2.73
6037502005	40.32	75.52	**75-80%**	Los Angeles	4930	13.89	72.98	13.12	70.73	20.43	1.38	0	1.83	5.64
6037502100	51.42	89.35	**85-90%**	Los Angeles	5036	11.85	71.31	16.84	81.16	15.79	0.99	0.24	1.83	0
6037502200	58.59	94.83	**90-95%**	Los Angeles	6937	12.08	74.3	13.62	91.18	5.56	0.14	0	2.78	0.33
6037502301	62.48	96.80	**95-100% (highest scores)**	Los Angeles	5794	12.84	71.47	15.69	92.01	4.21	0.95	2.31	0.48	0.03
6037502302	55.24	92.69	**90-95%**	Los Angeles	2970	12.32	78.22	9.46	89.43	5.79	2.15	0	1.75	0.88
6037502401	48.91	86.62	**85-90%**	Los Angeles	4957	16.32	69.34	14.34	86.46	8.49	0.75	0	3.69	0.61
6037502402	50.23	88.14	**85-90%**	Los Angeles	3874	10.02	73.52	16.47	91.48	7.87	0.05	0.18	0.41	0
6037502500	53.33	91.17	**90-95%**	Los Angeles	4274	8.89	76.44	14.67	94.17	4.47	0.28	0	1.08	0
6037502601	52.86	90.78	**90-95%**	Los Angeles	6939	11.77	72.43	15.79	91.22	5.14	2.28	0.1	1.25	0
6037502602	45.61	82.75	**80-85%**	Los Angeles	4477	9.25	77.46	13.29	87.51	8.8	1.23	0	1.56	0.89
6037502700	54.88	92.46	**90-95%**	Los Angeles	6919	9.11	77.92	12.98	78.55	11.01	4.68	0.22	2.7	2.83
6037502801	40.76	76.30	**75-80%**	Los Angeles	6468	11.83	74.94	13.23	82.58	13.71	0.43	0	2.58	0.7
6037502802	40.59	76.01	**75-80%**	Los Angeles	3221	11.58	66.28	22.14	51.94	13.75	7.2	0.22	25.12	1.77
6037502901	34.81	67.25	**65-70%**	Los Angeles	5816	10.47	78.73	10.8	75.79	15.22	1.07	0.29	2.84	4.8
6037502902	56.38	93.52	**90-95%**	Los Angeles	4168	13.2	75	11.8	88.46	4.41	0.41	0	4.08	2.64
6037503000	58.73	94.94	**90-95%**	Los Angeles	5606	18.21	76.26	5.53	89.14	4.87	0	3.16	2.32	0.52
6037503103	41.27	77.04	**75-80%**	Los Angeles	5204	14.49	72.39	13.12	85.24	8.42	0.12	0	6.23	0
6037503104	47.13	84.59	**80-85%**	Los Angeles	2542	13.1	77.3	9.6	85.25	4.45	0	0.83	9.48	0
6037503105	39.45	74.08	**70-75%**	Los Angeles	4228	16.01	75.12	8.87	81.76	13.1	0.09	0	4.16	0.88

6037503106	33.71	65.34	65-70%	Los Angeles	4091	12.2	74.63	13.18	72.53	15.25	0	0	6.8	5.43
6037503201	34.64	67.01	65-70%	Los Angeles	4144	13.92	69.33	16.75	66.17	16.99	3.89	0	11.66	1.3
6037503202	33.67	65.24	65-70%	Los Angeles	5028	11.79	73.43	14.78	76.81	12.27	0.62	0	10.04	0.26
6037503301	22.11	42.40	40-45%	Los Angeles	3374	12.92	76.05	11.03	63.78	29.85	0.74	0	4.06	1.57
6037503302	23.48	45.51	45-50%	Los Angeles	6784	12.78	77.95	9.27	75.35	17.44	0.04	0.52	3.76	2.89
6037503401	25.87	50.74	50-55%	Los Angeles	6492	13.99	68.11	17.9	58.39	33.09	1.43	0	6.07	1.02
6037503402	24.74	48.20	45-50%	Los Angeles	4129	11.94	74.26	13.8	65.78	28.99	0.27	0.12	3.78	1.07
6037503501	32.31	62.96	60-65%	Los Angeles	6444	10.85	78.03	11.13	69.91	18.54	0.95	1.01	7.12	2.47
6037503502	24.76	48.25	45-50%	Los Angeles	4655	9.95	76.61	13.45	71.13	23.59	0.06	1.03	2.69	1.5
6037503601	26.04	51.02	50-55%	Los Angeles	4151	9.4	71.21	19.39	41.94	34.55	6.22	1.32	11.97	4
6037503602	15.89	27.56	25-30%	Los Angeles	4212	8.24	73.46	18.3	48.05	35.94	0.45	0	11.97	3.58
6037503701	22.40	43.03	40-45%	Los Angeles	4840	11.96	73.99	14.05	53.6	42.38	0	0	3.87	0.17
6037503702	25.34	49.53	45-50%	Los Angeles	5516	10.15	74.11	15.74	54.77	34.52	0.67	0	6.78	3.26
6037503703	20.39	38.45	35-40%	Los Angeles	7622	8.07	61.47	30.46	18.54	27.62	0.29	0	52.53	1.02
6037503801	24.77	48.26	45-50%	Los Angeles	3851	9.95	76.29	13.76	46.04	31.91	0	0	15.74	6.31
6037503802	25.36	49.60	45-50%	Los Angeles	4900	10.57	75.08	14.35	40.1	28.47	1.96	0	27.41	2.06
6037503901	19.99	37.51	35-40%	Los Angeles	2942	13.73	69.78	16.49	45.14	32.7	0.71	0	18.9	2.55
6037503902	37.42	71.24	70-75%	Los Angeles	4939	13.04	73.44	13.53	47.78	34.97	0.47	0.2	13.14	3.44
6037504001	27.07	53.20	50-55%	Los Angeles	5860	9.16	80.46	10.38	34.74	42.85	1.93	0	16.35	4.13
6037504002	24.39	47.60	45-50%	Los Angeles	5461	10.29	77.77	11.94	48.47	34.08	3.75	0.29	12.2	1.21
6037504101	39.17	73.75	70-75%	Los Angeles	4826	9.8	70.93	19.27	66.39	15.21	2.32	0.41	14.94	0.73
6037504102	NA	NA	NA	Los Angeles	9	0	100	0	0	0	0	100	0	0
6037530003	41.52	77.36	75-80%	Los Angeles	3080	8.54	66.98	24.48	56.66	22.27	1.95	0	18.67	0.45
6037530004	52.44	90.47	90-95%	Los Angeles	3495	14.85	69.04	16.11	64.46	14.45	2.23	0	14.45	4.41
6037530005	43.37	79.98	75-80%	Los Angeles	3971	7.38	59.23	33.39	38.58	9.07	0.45	0	51.4	0.5
6037530006	46.25	83.56	80-85%	Los Angeles	4430	13.02	76.59	10.38	61.67	13.5	0.47	0	22.73	1.63
6037530101	58.18	94.60	90-95%	Los Angeles	5285	14.59	68.95	16.46	78.03	8.33	4.09	0.87	5.39	3.29
6037530102	49.30	87.18	85-90%	Los Angeles	4862	7.08	71.1	21.82	78.63	12.01	0.53	0	8.41	0.41
6037530202	46.47	83.83	80-85%	Los Angeles	4348	11.11	73.28	15.62	88.87	3.36	0	0	7.77	0
6037530203	51.62	89.56	85-90%	Los Angeles	2728	6.82	81.05	12.13	82.62	8.47	0.73	0	7.37	0.81
6037530204	45.37	82.34	80-85%	Los Angeles	3904	11.04	81.43	7.53	86.55	1.87	0	0	11.58	0
6037530301	49.60	87.43	85-90%	Los Angeles	2211	17.1	69.74	13.16	90.64	3.93	0	0	4.88	0.54
6037530302	49.56	87.41	85-90%	Los Angeles	6849	11.27	78.61	10.12	92.96	3.59	0.67	0	2.77	0
6037530400	51.21	89.09	85-90%	Los Angeles	3744	16.85	66.4	16.75	73.29	0.75	4.01	0	21.63	0.32
6037530500	64.90	97.79	95-100% (highest scores)	Los Angeles	3719	9.71	75.34	14.95	91.56	3.12	0.05	0	5.27	0
6037530601	62.95	97.06	95-100% (highest scores)	Los Angeles	2930	14.23	70.51	15.26	91.64	6.11	0	0	1.94	0.31
6037530602	56.59	93.71	90-95%	Los Angeles	1769	16.96	72.19	10.85	86.38	10.46	0.28	0	2.88	0
6037530700	64.38	97.58	95-100% (highest scores)	Los Angeles	2157	10.57	76.77	12.66	94.9	3.11	0	0	1.81	0.19
6037530801	58.21	94.62	90-95%	Los Angeles	5407	14	75.94	10.06	92.68	5.51	0	0	1.66	0.15
6037530802	50.04	87.92	85-90%	Los Angeles	3165	12.64	77.35	10.02	94.22	3.22	1.07	0	1.49	0
6037530901	46.94	84.34	80-85%	Los Angeles	3684	12.76	77.88	9.36	98.81	0.73	0.35	0	0.11	0
6037530902	51.68	89.67	85-90%	Los Angeles	3840	11.88	73.7	14.43	94.38	1.2	0	0	4.43	0
6037531000	60.33	95.88	95-100% (highest scores)	Los Angeles	5133	17.16	71.6	11.24	98.07	1.64	0	0	0	0.29
6037531101	60.98	96.23	95-100% (highest scores)	Los Angeles	4851	12.18	78.52	9.3	98.89	0.85	0.08	0.19	0	0
6037531102	57.46	94.18	90-95%	Los Angeles	3210	15.89	72.52	11.59	98.79	0.44	0	0.22	0.56	0
6037531201	50.76	88.62	85-90%	Los Angeles	5530	14.7	77.32	7.97	98.81	0.83	0.25	0	0.11	0
6037531202	51.42	89.36	85-90%	Los Angeles	4431	11.19	78.24	10.56	97.34	0.9	0.72	0	1.04	0
6037531301	67.89	98.56	95-100% (highest scores)	Los Angeles	4824	13.68	76.99	9.33	97.82	0.7	0.56	0	0.85	0.06
6037531302	73.71	99.55	95-100% (highest scores)	Los Angeles	6215	16.96	75.74	7.3	99.5	0.5	0	0	0	0
6037531502	52.83	90.75	90-95%	Los Angeles	3397	16.96	76.51	6.54	98.7	0.82	0	0	0.47	0
6037531503	56.07	93.28	90-95%	Los Angeles	2753	21.5	73.19	5.3	99.2	0.47	0	0.33	0	0
6037531504	60.49	96.00	95-100% (highest scores)	Los Angeles	4250	16.05	74.99	8.96	99.67	0.19	0	0	0	0.14
6037531602	57.77	94.39	90-95%	Los Angeles	4432	16.16	73.33	10.51	97.27	1.06	0.16	1.35	0.16	0
6037531603	48.08	85.62	85-90%	Los Angeles	3409	17.75	73.28	8.98	95.1	0.47	0	0	0.94	3.49
6037531604	48.86	86.57	85-90%	Los Angeles	3775	15.15	75.36	9.48	98.36	1.64	0	0	0	0
6037531701	44.22	81.13	80-85%	Los Angeles	5375	15.27	73.58	11.14	95.72	4.02	0	0.26	0	0
6037531702	60.92	96.21	95-100% (highest scores)	Los Angeles	5163	14.1	75.79	10.11	96.9	1.61	0	0	0.52	0.97
6037531800	38.79	73.21	70-75%	Los Angeles	4960	11.55	71.92	16.53	96.81	1.51	0	1.67	0	0

6037531901	51.64	89.57	85-90%	Los Angeles	6237	13.84	76.5	9.67	97.24	1.15	0.35	0	1.25	0
6037531902	52.02	90.07	90-95%	Los Angeles	4763	10.58	80.58	8.84	94.94	4.68	0	0	0.38	0
6037532001	62.27	96.63	95-100% (highest scores)	Los Angeles	3036	14.62	72.1	13.27	94.04	3.85	0.86	0	0.23	1.02
6037532002	60.58	96.05	95-100% (highest scores)	Los Angeles	3360	11.67	79.64	8.69	90.24	3.42	0	0.48	5.86	0
6037532101	50.94	88.80	85-90%	Los Angeles	6747	15.03	76.63	8.34	94.26	1.51	0	1.04	3.19	0
6037532102	36.15	69.44	65-70%	Los Angeles	3936	12.17	74.59	13.24	86.15	2.69	0.1	0	11.05	0
6037532200	52.15	90.18	90-95%	Los Angeles	7363	15.31	74.2	10.5	87.91	2.5	1.62	0	7.5	0.48
6037532302	74.06	99.58	95-100% (highest scores)	Los Angeles	4881	15.35	71.95	12.7	97.48	1.48	0.72	0	0.14	0.18
6037532303	61.50	96.39	95-100% (highest scores)	Los Angeles	4599	10.33	74.17	15.5	96.24	1.46	0.39	0	1.17	0.74
6037532304	70.00	99.08	95-100% (highest scores)	Los Angeles	4013	8.1	80.26	11.64	81.46	3.84	10.22	3.24	0.32	0.92
6037532400	NA	NA	NA	Los Angeles	45	15.56	73.33	11.11	80	17.78	2.22	0	0	0
6037532500	66.29	98.15	95-100% (highest scores)	Los Angeles	4195	15.45	76.9	7.65	93.9	1.62	2.17	0	2.31	0
6037532603	69.06	98.89	95-100% (highest scores)	Los Angeles	3289	20.86	72.97	6.17	97.72	1.16	1.12	0	0	0
6037532604	57.65	94.33	90-95%	Los Angeles	2739	14.6	74.92	10.48	97.77	1.02	0.8	0	0.26	0.15
6037532605	53.88	91.53	90-95%	Los Angeles	3301	16.48	69.95	13.57	94.06	2.33	2.42	0.3	0.87	0
6037532606	55.70	93.03	90-95%	Los Angeles	4405	15.6	71.96	12.44	96.69	2.54	0.57	0	0.2	0
6037532700	63.92	97.45	95-100% (highest scores)	Los Angeles	3417	18.61	75.86	5.53	93.5	1	5.18	0	0.32	0
6037532800	65.54	97.95	95-100% (highest scores)	Los Angeles	4590	23.42	72.16	4.42	94.25	0.54	5.16	0	0.04	0
6037532900	66.87	98.39	95-100% (highest scores)	Los Angeles	7058	18.35	75.79	5.87	93.6	0.64	5.4	0	0.37	0
6037533001	67.56	98.50	95-100% (highest scores)	Los Angeles	4709	16.95	75.22	7.84	93.74	1.02	5.25	0	0	0
6037533002	69.29	98.93	95-100% (highest scores)	Los Angeles	2705	21.26	71.61	7.13	96.12	0.7	0.37	0	0	2.81
6037533103	57.33	94.07	90-95%	Los Angeles	3283	15.57	76.36	8.07	96.95	2.62	0.43	0	0	0
6037533104	44.07	80.94	80-85%	Los Angeles	4415	17.71	69.72	12.57	96.92	1.68	1.2	0.02	0.07	0.11
6037533105	55.31	92.75	90-95%	Los Angeles	2510	11.47	82.55	5.98	99.44	0.56	0	0	0	0
6037533106	42.92	79.36	75-80%	Los Angeles	1655	14.86	77.82	7.31	96.8	0.42	0	2.78	0	0
6037533107	49.44	87.33	85-90%	Los Angeles	3503	12.5	80.33	7.17	98.83	1	0	0	0.17	0
6037533201	54.56	92.15	90-95%	Los Angeles	2788	17.32	73.6	9.07	98.03	1.97	0	0	0	0
6037533202	50.91	88.77	85-90%	Los Angeles	3124	13.38	78.81	7.81	99.33	0.42	0	0.26	0	0
6037533203	49.43	87.32	85-90%	Los Angeles	1931	18.69	72.6	8.7	98.14	0.26	0.05	0	0.47	1.09
6037533300	57.57	94.26	90-95%	Los Angeles	3346	21.52	73.76	4.72	98	1.26	0.36	0	0	0.39
6037533401	57.08	93.92	90-95%	Los Angeles	5098	12.71	76.83	10.46	99.61	0.39	0	0	0	0
6037533402	52.52	90.52	90-95%	Los Angeles	4240	17.03	76.06	6.91	98.63	1.37	0	0	0	0
6037533403	62.44	96.76	95-100% (highest scores)	Los Angeles	2848	14.29	72.37	13.34	94.7	2.21	1.62	0	1.47	0
6037533501	54.59	92.18	90-95%	Los Angeles	3051	10.62	82.33	7.05	99.74	0.26	0	0	0	0
6037533502	43.78	80.52	80-85%	Los Angeles	2143	16.61	74.43	8.96	97.01	2.99	0	0	0	0
6037533503	47.87	85.33	85-90%	Los Angeles	2141	17.89	74.92	7.19	94.26	0.33	5.14	0	0	0.28
6037533601	55.49	92.90	90-95%	Los Angeles	4762	16.32	75.66	8.02	94.79	3.72	0	0	1.49	0
6037533602	60.10	95.73	95-100% (highest scores)	Los Angeles	5546	17.69	73.93	8.38	90.41	5.27	0	0.23	1.44	2.65
6037533603	62.93	97.05	95-100% (highest scores)	Los Angeles	6986	18.42	72.16	9.42	91.41	6.94	0.67	0.26	0	0.72
6037533701	51.65	89.60	85-90%	Los Angeles	2998	18.71	72.65	8.64	95.7	3.14	0.47	0.27	0.27	0.17
6037533702	55.78	93.10	90-95%	Los Angeles	3543	15.69	77.82	6.49	99.32	0.2	0	0	0.48	0
6037533703	64.41	97.59	95-100% (highest scores)	Los Angeles	5259	14.2	77.52	8.27	100	0	0	0	0	0
6037533803	51.36	89.28	85-90%	Los Angeles	6324	14.33	76.15	9.52	87.79	10.64	1.01	0.06	0.49	0
6037533804	47.42	84.92	80-85%	Los Angeles	4207	9.34	81.53	9.13	98.29	1.19	0	0	0.52	0
6037533805	55.77	93.08	90-95%	Los Angeles	3485	11.08	76.73	12.2	97.42	0.26	1.64	0	0.69	0
6037533806	72.00	99.37	95-100% (highest scores)	Los Angeles	3794	17.03	74.7	8.28	94.89	0.95	3.53	0	0.63	0
6037533901	60.67	96.13	95-100% (highest scores)	Los Angeles	6320	14.6	78.24	7.15	95	2.28	2.04	0	0	0.68
6037533902	62.81	97.02	95-100% (highest scores)	Los Angeles	4049	13.98	80.12	5.9	98.25	1.53	0	0	0.22	0
6037534001	54.34	91.97	90-95%	Los Angeles	5125	13.33	77.85	8.82	97.42	1.44	0	0.31	0.82	0
6037534002	43.13	79.70	75-80%	Los Angeles	4628	15.58	73.4	11.02	93.34	4.82	0.84	0	0.93	0.06
6037534101	63.32	97.23	95-100% (highest scores)	Los Angeles	2358	14.84	75.06	10.09	91.09	1.31	1.91	0	5.68	0
6037534102	71.90	99.34	95-100% (highest scores)	Los Angeles	6219	20.53	73.32	6.14	98.49	0.26	1.25	0	0	0
6037534201	72.69	99.43	95-100% (highest scores)	Los Angeles	4768	20.62	72.17	7.21	96.14	2.06	0.99	0.29	0.42	0.1
6037534202	73.82	99.56	95-100% (highest scores)	Los Angeles	5748	13.8	77.89	8.32	93.23	6.28	0.24	0	0.24	0
6037534203	66.73	98.36	95-100% (highest scores)	Los Angeles	3206	13.63	75.23	11.14	97.91	1.72	0.22	0	0.16	0
6037534301	71.40	99.28	95-100% (highest scores)	Los Angeles	4320	16	75.51	8.5	92.15	3.61	1.74	0	1.6	0.9
6037534302	70.45	99.18	95-100% (highest scores)	Los Angeles	3720	14.22	79.54	6.24	96.53	1.53	1.4	0.16	0.38	0
6037534403	46.36	83.72	80-85%	Los Angeles	2795	12.56	79.57	7.87	94.17	5.83	0	0	0	0

6037534404	51.92	89.93	85-90%	Los Angeles	3677	13.24	79.63	7.13	90.35	7.83	0.33	0.33	1.17	0
6037534405	63.83	97.42	95-100% (highest scores)	Los Angeles	4351	18.69	74.67	6.64	97.54	0.71	0.25	0.21	0.74	0.55
6037534406	59.44	95.32	95-100% (highest scores)	Los Angeles	5027	18.34	76.01	5.65	98.85	0.97	0.18	0	0	0
6037534501	47.05	84.54	80-85%	Los Angeles	5226	12.46	79.12	8.42	97.21	1.74	0.08	0.1	0	0.88
6037534502	60.39	95.93	95-100% (highest scores)	Los Angeles	4654	16.18	72.48	11.35	96.86	2.26	0.39	0	0.34	0.15
6037534700	35.19	67.88	65-70%	Los Angeles	4435	9.04	76.87	14.09	97.09	2.01	0	0.36	0.41	0.14
6037534802	47.35	84.86	80-85%	Los Angeles	3136	12.12	75.48	12.4	97.58	1.31	0.19	0	0	0.92
6037534803	50.64	88.53	85-90%	Los Angeles	4589	12.84	76.73	10.44	97.08	0.78	0	0	1.83	0.31
6037534804	54.01	91.69	90-95%	Los Angeles	3736	14.27	76.69	9.05	98.5	0.51	0	0	0.88	0.11
6037534900	57.57	94.25	90-95%	Los Angeles	6319	11.73	80.87	7.41	99.29	0.41	0	0	0.3	0
6037535001	63.05	97.10	95-100% (highest scores)	Los Angeles	4512	20.74	72.41	6.85	91.95	0	7.29	0.58	0	0.18
6037535002	61.58	96.44	95-100% (highest scores)	Los Angeles	3648	15.16	76.18	8.66	97.31	0	2.33	0.36	0	0
6037535101	63.95	97.48	95-100% (highest scores)	Los Angeles	7949	19.5	71.62	8.88	89.48	0.68	8.39	0	0	1.45
6037535102	62.09	96.55	95-100% (highest scores)	Los Angeles	4621	16.92	75.52	7.55	88.4	0.82	9.89	0	0.13	0.76
6037535200	62.02	96.52	95-100% (highest scores)	Los Angeles	6111	15.27	79.43	5.3	88.14	0.15	10.96	0	0	0.75
6037535300	63.66	97.33	95-100% (highest scores)	Los Angeles	6524	16.97	76.35	6.68	95.8	0	4.2	0	0	0
6037535400	74.90	99.63	95-100% (highest scores)	Los Angeles	3553	13.2	80.47	6.33	89.36	0.65	9.46	0	0.17	0.37
6037535501	56.30	93.39	90-95%	Los Angeles	3898	18.96	71.5	9.54	96.64	1.82	0.72	0	0.25	0.56
6037535502	45.81	83.02	80-85%	Los Angeles	5411	8.54	83.76	7.71	94.1	2.33	0.37	0	2.99	0.2
6037535503	42.26	78.40	75-80%	Los Angeles	2240	9.91	79.78	10.31	98.53	0.36	0	1.12	0	0
6037535603	62.79	97.01	95-100% (highest scores)	Los Angeles	3998	18.83	71.54	9.63	96.37	0.33	3.15	0	0.15	0
6037535604	62.19	96.60	95-100% (highest scores)	Los Angeles	4476	17.58	73.79	8.62	99.42	0.58	0	0	0	0
6037535605	50.31	88.22	85-90%	Los Angeles	4440	11.4	79.53	9.08	99.37	0.63	0	0	0	0
6037535606	60.76	96.15	95-100% (highest scores)	Los Angeles	2007	19.43	70.55	10.01	97.31	1.94	0.75	0	0	0
6037535607	55.62	92.97	90-95%	Los Angeles	4946	13.38	76.08	10.53	98.97	0.51	0	0.53	0	0
6037535701	40.75	76.29	75-80%	Los Angeles	5237	14.99	77.58	7.43	97.21	0.69	0	0	1.76	0.34
6037535702	52.64	90.63	90-95%	Los Angeles	5638	13.99	79	7.01	95.1	4.2	0	0	0.16	0.53
6037535802	37.41	71.22	70-75%	Los Angeles	6600	14.06	72.77	13.17	95.56	3.59	0	0	0.55	0.3
6037535803	42.20	78.32	75-80%	Los Angeles	4246	16.77	72.82	10.41	98.94	0.92	0	0	0.14	0
6037535804	46.66	84.01	80-85%	Los Angeles	5328	13.87	79.43	6.7	97.73	1.09	0.98	0.21	0	0
6037535901	59.06	95.12	95-100% (highest scores)	Los Angeles	5578	12.44	77.73	9.82	99.32	0.68	0	0	0	0
6037535902	38.27	72.55	70-75%	Los Angeles	7209	12.12	75.21	12.66	95.69	2.62	0	0	1.5	0.19
6037536000	66.38	98.18	95-100% (highest scores)	Los Angeles	3701	17.7	74.82	7.48	97.81	1.05	0	0.76	0.38	0
6037536102	63.73	97.35	95-100% (highest scores)	Los Angeles	3155	12.01	67.23	20.76	76.45	22.6	0.38	0	0.32	0.25
6037536103	66.43	98.23	95-100% (highest scores)	Los Angeles	5353	12.65	76.97	10.39	96.53	2.22	0.17	0	0.15	0.93
6037536104	75.11	99.67	95-100% (highest scores)	Los Angeles	3900	16.74	73.21	10.05	93.74	3.26	1.51	0	0.79	0.69
6037536200	57.46	94.19	90-95%	Los Angeles	7281	13.76	76.12	10.12	87.47	7.79	2.06	0	2.68	0
6037540000	68.47	98.76	95-100% (highest scores)	Los Angeles	7139	14.34	77.08	8.57	95.08	1.39	2.63	0	0.69	0.21
6037540101	51.26	89.20	85-90%	Los Angeles	6743	14.74	75.37	9.89	88.91	2.51	7.59	0	0.99	0
6037540102	53.34	91.19	90-95%	Los Angeles	6905	13.83	78.06	8.11	86.53	1.23	10.66	1.26	0.32	0
6037540201	40.53	75.92	75-80%	Los Angeles	2587	21.99	73.52	4.48	98.03	0.31	0.77	0.31	0.58	0
6037540202	49.30	87.17	85-90%	Los Angeles	7116	18.34	72.48	9.18	90.26	4.51	3.01	0.32	1.76	0.14
6037540203	65.11	97.86	95-100% (highest scores)	Los Angeles	5807	14.43	80.85	4.72	88.44	0.96	8.89	0.69	0.5	0.52
6037540300	55.86	93.14	90-95%	Los Angeles	4728	15.67	75.47	8.86	97.1	0.99	0.23	0	1.67	0
6037540400	70.56	99.21	95-100% (highest scores)	Los Angeles	2109	11.81	83.4	4.79	84.21	0.19	15.6	0	0	0
6037540501	60.30	95.86	95-100% (highest scores)	Los Angeles	6713	9.28	84.75	5.97	79.8	7.79	10.46	0.27	0.97	0.72
6037540502	63.66	97.31	95-100% (highest scores)	Los Angeles	6163	19.2	76.55	4.25	83.47	3.2	12.93	0	0.41	0
6037540600	62.34	96.65	95-100% (highest scores)	Los Angeles	4981	21.98	70.87	7.15	76.33	0.52	23.15	0	0	0
6037540700	72.57	99.39	95-100% (highest scores)	Los Angeles	3230	15.42	76.69	7.89	70.71	3.44	25.05	0	0.68	0.12
6037540800	51.48	89.44	85-90%	Los Angeles	5287	15.79	74.37	9.84	44.22	0.02	51.33	0	0	4.43
6037540901	72.25	99.38	95-100% (highest scores)	Los Angeles	4904	11.95	71.94	16.11	74.02	3.02	21.29	0.27	0.83	0.57
6037540902	58.70	94.91	90-95%	Los Angeles	4707	9.75	75.87	14.38	38.52	1.15	58.3	0	0	2.04
6037541001	53.98	91.67	90-95%	Los Angeles	1144	13.81	69.67	16.52	39.77	3.67	48.69	0	7.87	0
6037541002	54.69	92.27	90-95%	Los Angeles	3318	11.87	72.81	15.31	28.87	14.62	55.09	0	1.02	0.39
6037541100	59.91	95.66	95-100% (highest scores)	Los Angeles	3251	14.49	73.36	12.15	55.21	1.94	38.48	0	1.85	2.52
6037541200	59.14	95.20	95-100% (highest scores)	Los Angeles	6546	13.47	71.1	15.43	48.03	1.01	47.13	0	0.75	3.09
6037541300	55.52	92.94	90-95%	Los Angeles	5512	18.41	69.61	11.97	69.07	0.76	27.92	0	0.73	1.52
6037541400	56.55	93.67	90-95%	Los Angeles	7989	20.8	72.69	6.51	84.72	0.76	8.39	2.78	3.22	0.14

6037541500	59.12	95.15	95-100% (highest scores)	Los Angeles	6273	21.01	74.84	4.14	82.75	0.41	16.72	0	0	0.11
6037541603	65.99	98.10	95-100% (highest scores)	Los Angeles	3059	16.61	75.02	8.37	83.79	1.86	12.65	0	0.78	0.92
6037541604	65.81	98.05	95-100% (highest scores)	Los Angeles	5917	17.32	74.11	8.57	85.23	2.21	11.83	0	0.19	0.54
6037541605	65.31	97.91	95-100% (highest scores)	Los Angeles	4805	8.93	83.18	7.89	73.11	0.56	23.7	0	2.62	0
6037541606	61.02	96.26	95-100% (highest scores)	Los Angeles	2348	16.23	78.92	4.86	81.69	0.81	17.5	0	0	0
6037541700	63.34	97.24	95-100% (highest scores)	Los Angeles	6638	15.43	72.94	11.63	90.33	0.86	7.26	0.5	0.5	0.56
6037541801	51.39	89.32	85-90%	Los Angeles	6180	18.45	74.92	6.63	77.67	1.08	19.32	0.29	0.02	1.62
6037541802	52.74	90.70	90-95%	Los Angeles	5306	15.38	78.31	6.31	85.81	0.98	10.99	0	2.02	0.21
6037542000	52.29	90.34	90-95%	Los Angeles	4708	15	72.45	12.55	64.63	1.72	32.43	0	1.21	0
6037542103	46.64	84.00	80-85%	Los Angeles	3685	11.04	80.6	8.36	87	0.43	12.37	0	0.19	0
6037542104	55.28	92.73	90-95%	Los Angeles	3473	16.38	77.37	6.25	85.89	3.31	9.13	0.35	0.4	0.92
6037542105	54.40	92.04	90-95%	Los Angeles	4781	18.07	73.12	8.81	83.79	1.07	13.24	0.88	0	1.02
6037542106	65.67	98.00	95-100% (highest scores)	Los Angeles	3523	13.65	78.57	7.78	85.15	1.19	8.57	0	3.41	1.67
6037542200	73.92	99.57	95-100% (highest scores)	Los Angeles	7155	15.16	75.77	9.07	71.45	1.05	26.25	0	0	1.26
6037542401	73.16	99.48	95-100% (highest scores)	Los Angeles	4735	11.76	77.47	10.77	59.92	0.7	34.61	0	3.33	1.44
6037542402	80.71	99.94	95-100% (highest scores)	Los Angeles	3306	11.34	77.53	11.13	65.34	0.54	33.55	0	0.57	0
6037542501	52.10	90.14	90-95%	Los Angeles	4891	18.26	71.21	10.53	42.94	0	46.45	0	0.25	10.37
6037542502	66.21	98.13	95-100% (highest scores)	Los Angeles	5006	17.9	73.39	8.71	62.66	0.66	34.56	0.34	0.08	1.7
6037542601	64.69	97.69	95-100% (highest scores)	Los Angeles	3295	18.42	76.9	4.67	80.33	1.4	16.42	0	1.85	0
6037542602	60.27	95.84	95-100% (highest scores)	Los Angeles	5934	12.55	80.59	6.86	76.96	0.76	21.81	0	0	0.47
6037542700	50.88	88.73	85-90%	Los Angeles	6129	16.33	77.52	6.15	78.3	2.07	19.11	0.13	0	0.39
6037542800	50.23	88.15	85-90%	Los Angeles	2980	16.88	69.63	13.49	52.95	2.58	42.68	0	0	1.78
6037542900	54.45	92.08	90-95%	Los Angeles	3254	19.24	71.82	8.94	84.79	0.92	13.09	0	0.74	0.46
6037543000	65.75	98.02	95-100% (highest scores)	Los Angeles	4531	17.77	68.95	13.29	47.52	1.57	49.53	0	0.5	0.88
6037543100	62.43	96.75	95-100% (highest scores)	Los Angeles	7254	13.44	75.86	10.7	45.66	1.03	47.46	0	1.63	4.22
6037543201	59.33	95.26	95-100% (highest scores)	Los Angeles	3605	18.06	71.9	10.04	60.61	3.19	34.45	0.19	1.03	0.53
6037543202	79.29	99.91	95-100% (highest scores)	Los Angeles	5124	18.6	72.48	8.92	78.14	1.09	15.67	0	4.84	0.25
6037543304	35.36	68.08	65-70%	Los Angeles	5872	7.58	71.58	20.84	6.2	7.85	80.64	0	3.22	2.09
6037543305	56.21	93.36	90-95%	Los Angeles	3776	11.71	72.75	15.55	50.11	18.88	25.19	0	3.29	2.54
6037543306	42.90	79.31	75-80%	Los Angeles	7863	11.76	73.31	14.93	28.84	7.58	14.32	0	44.5	4.76
6037543321	35.20	67.89	65-70%	Los Angeles	5446	10.28	63.62	26.09	11.81	6.98	58.48	0	16.42	6.32
6037543322	38.57	72.98	70-75%	Los Angeles	7959	6.99	72.38	20.63	10.45	2.24	72.08	1.21	10.46	3.57
6037543400	55.98	93.26	90-95%	Los Angeles	3731	8.95	71.4	19.65	57.89	4.13	20.93	0	14.64	2.41
6037543501	53.67	91.44	90-95%	Los Angeles	7457	9.13	72.29	18.57	27.4	6.13	6.13	0	57.79	2.55
6037543502	51.10	89.01	85-90%	Los Angeles	4218	9.84	70.55	19.61	56.07	10	3.25	0.26	28.4	2.02
6037543503	44.70	81.61	80-85%	Los Angeles	5696	9.83	65.2	24.96	33.08	15.68	8.44	0	40.03	2.77
6037543601	35.46	68.38	65-70%	Los Angeles	3781	10.69	75.54	13.78	42.58	6.03	9.28	0.5	39.2	2.41
6037543602	31.95	62.34	60-65%	Los Angeles	7864	11.98	67.29	20.73	30.33	18.88	5.32	0	40.35	5.12
6037543603	33.17	64.41	60-65%	Los Angeles	4301	5.93	62.15	31.92	21.86	18.44	27.51	0	28.64	3.56
6037543604	39.17	73.73	70-75%	Los Angeles	5226	9.99	70.65	19.36	31.38	8.21	7.73	0	48.11	4.57
6037543701	37.56	71.42	70-75%	Los Angeles	3057	11.09	76.05	12.86	55.58	3.83	0	0	40.13	0.46
6037543702	42.56	78.73	75-80%	Los Angeles	6637	10.05	77.72	12.23	55.4	6.81	7.62	0	27.95	2.21
6037543703	34.96	67.47	65-70%	Los Angeles	3370	9.79	75.07	15.13	56.59	8.9	2.52	0	24.84	7.15
6037543801	57.14	93.99	90-95%	Los Angeles	5159	13.28	68.7	18.03	37.97	12.27	10.12	1.1	35.7	2.83
6037543802	48.21	85.77	85-90%	Los Angeles	6478	10.62	75.05	14.33	37.06	4.35	7.59	0.46	48.47	2.05
6037543903	54.34	91.96	90-95%	Los Angeles	3740	8.4	72.57	19.04	43.21	12.99	4.04	0.16	35.45	4.14
6037543905	56.25	93.38	90-95%	Los Angeles	4636	16.13	74.94	8.93	75.32	2.85	3.86	0.15	17.58	0.24
6037544001	56.55	93.62	90-95%	Los Angeles	4574	12.05	77.81	10.14	69.44	7.02	6.3	0	16.3	0.94
6037544002	45.50	82.56	80-85%	Los Angeles	3187	10.42	76.47	13.12	60.59	11.64	7.06	0.35	14.94	5.43
6037550000	NA	NA	NA	Los Angeles	1982	2.47	84.61	12.92	45.01	30.37	15.49	0.66	7.26	1.21
6037550100	47.01	84.51	80-85%	Los Angeles	7329	12.73	74.1	13.17	75.04	9.48	5.47	0	9.82	0.18
6037550201	37.25	70.89	70-75%	Los Angeles	2911	17.66	71.76	10.58	80.42	8.35	3.61	0	6.22	1.41
6037550202	44.31	81.25	80-85%	Los Angeles	5710	13.85	75.1	11.05	71.8	10.63	6.57	0.79	8.19	2.01
6037550300	53.74	91.49	90-95%	Los Angeles	8421	13.89	76.58	9.52	68.19	15.12	2.07	0	12.9	1.72
6037550400	35.23	67.91	65-70%	Los Angeles	1226	10.52	71.13	18.35	80.34	11.58	0.08	0.16	7.83	0
6037550500	34.18	66.25	65-70%	Los Angeles	8316	9.56	77.38	13.06	73.03	14.68	1.02	0	9.8	1.47
6037550601	36.74	70.17	70-75%	Los Angeles	5960	15.57	76.29	8.14	73.34	16.12	2.53	0	6.68	1.33
6037550602	28.03	55.04	55-60%	Los Angeles	4328	8.73	75.74	15.53	70.15	19.76	0.6	0	7.39	2.1

6037550700	39.76	74.63	70-75%	Los Angeles	6104	16.74	66.04	17.22	75.18	20.46	0.97	0.23	2.42	0.74
6037550800	40.85	76.36	75-80%	Los Angeles	7403	12.39	72.21	15.4	79.02	13.22	0.74	0	5.92	1.09
6037550901	39.07	73.60	70-75%	Los Angeles	4141	13.09	76.5	10.41	72.86	14.71	3.02	0	8.48	0.94
6037550902	26.49	51.97	50-55%	Los Angeles	5803	10.72	81.35	7.93	77.75	12.98	0.81	0	7.24	1.22
6037551000	37.62	71.51	70-75%	Los Angeles	7281	14.06	69.62	16.32	66.46	18.01	2.36	0	11.5	1.68
6037551101	43.12	79.69	75-80%	Los Angeles	3964	18.29	74.37	7.34	77.67	5.22	5.55	0	10.42	1.14
6037551102	51.45	89.40	85-90%	Los Angeles	5427	13.23	80.71	6.06	81.81	6.47	4.7	0	6.26	0.76
6037551201	25.45	49.76	45-50%	Los Angeles	3272	7.12	76.74	16.14	74.94	13.11	4.52	0	7.43	0
6037551202	38.11	72.35	70-75%	Los Angeles	7840	12.54	78.27	9.2	77.27	13.15	5.33	0.22	3.78	0.26
6037551300	42.60	78.82	75-80%	Los Angeles	5449	11.27	73.02	15.71	79.26	11.71	2.97	0	5.21	0.84
6037551401	47.01	84.48	80-85%	Los Angeles	4582	11.79	77.19	11.02	79.16	9.95	4.19	0.55	6.15	0
6037551402	36.29	69.53	65-70%	Los Angeles	4677	14.18	75.95	9.88	72.57	17.32	4.3	0	5.6	0.21
6037551501	37.31	71.08	70-75%	Los Angeles	4596	8.9	78.55	12.55	66.23	18.3	6.48	0.54	7.48	0.96
6037551502	26.45	51.80	50-55%	Los Angeles	4898	11.19	76.75	12.07	69.17	14.45	5.92	0	8.94	1.51
6037551600	NA	NA	NA	Los Angeles	31	0	38.71	61.29	38.71	61.29	0	0	0	0
6037551700	42.97	79.44	75-80%	Los Angeles	6262	11.61	77.37	11.02	79.58	10.59	3.18	0	4.39	2.27
6037551800	45.52	82.60	80-85%	Los Angeles	7267	9.27	81.57	9.15	70.51	15.34	5.96	0	6.63	1.55
6037551900	47.54	85.00	80-85%	Los Angeles	5203	11.99	74.51	13.49	65.69	12.9	7.09	0.19	13.72	0.4
6037552001	40.25	75.38	75-80%	Los Angeles	4188	14.35	73.9	11.75	72.18	7.64	6.42	0.31	11.87	1.58
6037552002	45.48	82.55	80-85%	Los Angeles	3409	10.62	79.08	10.3	61.84	7.77	8.95	0	20.53	0.91
6037552100	48.04	85.51	85-90%	Los Angeles	6624	14.82	68.8	16.38	70.49	9.27	3.97	0	15.02	1.25
6037552200	49.13	86.91	85-90%	Los Angeles	5686	17.43	75.92	6.65	81.02	6.81	3.8	0.47	7.02	0.88
6037552301	48.71	86.40	85-90%	Los Angeles	4482	12.38	74.81	12.81	62.14	6.47	10.71	0	20.3	0.38
6037552302	43.53	80.16	80-85%	Los Angeles	4107	9.13	72.88	17.99	56.61	13.95	7.62	0	20.96	0.85
6037552400	55.92	93.19	90-95%	Los Angeles	2423	14.73	74.7	10.57	78.42	5.57	3.76	0.25	9.16	2.85
6037552601	42.97	79.45	75-80%	Los Angeles	5260	15.76	77.24	7	87.03	3.88	3.33	0.15	4.77	0.84
6037552602	50.12	88.01	85-90%	Los Angeles	4416	14.11	72.87	13.02	54.33	8.38	5.21	0.43	30.62	1.04
6037552700	43.58	80.22	80-85%	Los Angeles	6819	12.95	76.33	10.72	74.01	11.76	0.67	0	13.04	0.51
6037552800	37.11	70.75	70-75%	Los Angeles	6198	15.8	73.3	10.91	73.81	12.94	0	0	12.88	0.37
6037552900	40.59	76.02	75-80%	Los Angeles	7156	13.86	74.52	11.61	60.97	10.62	5.49	0.45	20.43	2.04
6037553000	38.43	72.86	70-75%	Los Angeles	5033	14.15	73.32	12.54	77.93	12	1.65	0	6.98	1.45
6037553100	40.72	76.21	75-80%	Los Angeles	6770	17.28	71.43	11.29	46.79	17.42	13	0.28	18.55	3.96
6037553200	35.57	68.53	65-70%	Los Angeles	7637	14.17	75.34	10.49	63.45	15.69	7.78	0.13	11.71	1.24
6037553300	36.60	70.02	70-75%	Los Angeles	3214	6.47	77.07	16.46	66.15	14.53	5.88	0.06	10.86	2.52
6037553400	39.94	74.89	70-75%	Los Angeles	3495	11.13	74.59	14.28	79.83	9.24	3.46	0	7.47	0
6037553502	46.78	84.11	80-85%	Los Angeles	4066	13.5	76.91	9.59	69.28	9.17	13.38	0	6.79	1.38
6037553503	35.75	68.77	65-70%	Los Angeles	2906	11.05	81.56	7.4	81.9	2.34	13.94	0	0.69	1.14
6037553504	52.25	90.32	90-95%	Los Angeles	5363	14.66	76.21	9.14	79.58	7.89	7.78	0	3.97	0.78
6037553601	58.81	95.01	95-100% (highest scores)	Los Angeles	4699	11.83	78.83	9.34	85.74	3.81	4.94	0	4.81	0.7
6037553602	49.76	87.59	85-90%	Los Angeles	4752	12.44	80.6	6.97	72.77	4.97	18.64	0.36	3.27	0
6037553701	62.66	96.92	95-100% (highest scores)	Los Angeles	3981	14.39	78.55	7.06	93.09	3.37	1.83	0	1.31	0.4
6037553702	60.12	95.75	95-100% (highest scores)	Los Angeles	4723	15.58	76.75	7.66	90.79	0.78	6.48	0	1.46	0.49
6037553801	60.44	95.94	95-100% (highest scores)	Los Angeles	4954	16.47	78.22	5.31	85.37	0.99	9.45	0	3.58	0.63
6037553802	64.69	97.68	95-100% (highest scores)	Los Angeles	6881	17.76	72.17	10.07	76.62	7.47	11.32	0.15	2.47	1.98
6037553901	46.50	83.86	80-85%	Los Angeles	6773	14.22	74.53	11.25	84.75	5.33	4.53	0	3.16	2.23
6037553902	46.54	83.89	80-85%	Los Angeles	5415	11.91	79.72	8.37	73.07	11.63	7.15	0	6.52	1.63
6037554001	40.62	76.08	75-80%	Los Angeles	3756	8.07	80.46	11.47	57.8	21.62	6.66	0	12.86	1.06
6037554002	46.24	83.52	80-85%	Los Angeles	5856	13.97	76.52	9.51	59.9	15.3	10.28	0	12.89	1.62
6037554101	44.03	80.90	80-85%	Los Angeles	3548	17.9	73.68	8.43	79.09	8.26	6.54	0	4.51	1.61
6037554103	26.48	51.90	50-55%	Los Angeles	1396	11.82	78.22	9.96	67.69	11.96	11.82	0	7.31	1.22
6037554104	43.03	79.55	75-80%	Los Angeles	2414	12.39	78.71	8.91	57.54	11.27	16.74	0.41	13.09	0.95
6037554105	49.36	87.25	85-90%	Los Angeles	4478	14.05	77.91	8.04	45.98	17.42	24.07	1.25	9.8	1.47
6037554201	37.83	71.84	70-75%	Los Angeles	4356	10.42	80.99	8.59	68.25	15.43	2.87	0.23	10.79	2.43
6037554203	42.71	78.96	75-80%	Los Angeles	3730	15.92	72.17	11.9	58.53	25.74	2.73	0	11.58	1.42
6037554204	37.65	71.56	70-75%	Los Angeles	4313	14.38	71.9	13.73	59.26	13.03	14.31	0	9.23	4.17
6037554301	46.17	83.45	80-85%	Los Angeles	3499	13.26	78.31	8.43	66.16	10.77	15.32	0	7.75	0
6037554302	51.86	89.85	85-90%	Los Angeles	4393	17.25	77.99	4.76	57.75	4.94	15.16	0.14	19.58	2.44
6037554403	51.00	88.87	85-90%	Los Angeles	5848	14.26	74.83	10.91	49.08	13.58	24.2	0.12	9.58	3.45

6037554404	44.55	81.45	80-85%	Los Angeles	4206	18.33	71.18	10.49	47.84	14.05	18.81	0.31	16.95	2.04
6037554405	38.21	72.47	70-75%	Los Angeles	3015	16.32	70.08	13.6	46.57	21.29	18.97	0.8	9.19	3.18
6037554406	31.11	60.88	60-65%	Los Angeles	4766	9.34	68.9	21.76	26.86	28.98	16.6	0.1	20.77	6.69
6037554511	34.77	67.20	65-70%	Los Angeles	4140	8.79	71.16	20.05	12.66	12.97	5.17	0	65.14	4.06
6037554512	32.32	62.97	60-65%	Los Angeles	6455	9.45	65.87	24.68	8.18	11.48	6.32	0.19	71.56	2.28
6037554513	22.87	44.16	40-45%	Los Angeles	2758	12.44	66.72	20.85	10.41	9.79	5.62	0	68.17	6.02
6037554514	18.83	34.80	30-35%	Los Angeles	4700	7.81	74.06	18.13	17.68	12.89	9.34	0	57.11	2.98
6037554515	13.10	20.74	20-25%	Los Angeles	3793	6.12	69.21	24.68	13.6	16.58	14.74	0	45.13	9.94
6037554516	21.87	41.96	40-45%	Los Angeles	3885	6.8	67.88	25.33	16.04	10.73	14.47	0.28	58.48	0
6037554517	21.49	41.10	40-45%	Los Angeles	4510	7.21	71.15	21.64	10.2	10.71	2.46	0	71.8	4.83
6037554518	21.65	41.38	40-45%	Los Angeles	5511	10.07	70.24	19.69	13.81	13.97	8.75	0	61.28	2.2
6037554519	23.35	45.34	45-50%	Los Angeles	3498	3.97	64.32	31.7	10.15	15.92	2.77	2.66	65.27	3.23
6037554521	31.67	61.74	60-65%	Los Angeles	5949	9.85	65.93	24.22	19.2	19.48	12.59	0	41.87	6.86
6037554522	25.34	49.57	45-50%	Los Angeles	4944	7.4	66.81	25.79	17.98	17.37	9.39	0.24	50.73	4.29
6037554600	31.87	62.14	60-65%	Los Angeles	4173	8.91	76.78	14.31	46.15	12.17	2.25	0.12	37.34	1.97
6037554700	35.69	68.70	65-70%	Los Angeles	4328	10.42	74.63	14.95	76.94	4.62	0.72	0	17.35	0.37
6037554801	38.02	72.19	70-75%	Los Angeles	2744	10.97	79.08	9.95	76.53	7.03	2.7	0	10.2	3.53
6037554802	36.56	69.96	65-70%	Los Angeles	6378	10.21	72.91	16.89	26.42	15.91	4.3	0	50.01	3.36
6037554900	32.86	63.73	60-65%	Los Angeles	7636	8.6	75.35	16.04	38.1	17.5	6.57	0.71	34.32	2.82
6037555001	43.16	79.73	75-80%	Los Angeles	5321	11.52	75.21	13.27	47.36	15.26	5.77	0.15	29.94	1.52
6037555002	32.19	62.76	60-65%	Los Angeles	3625	14.4	75.72	9.88	37.74	28.74	14.73	0	17.54	1.24
6037555102	38.96	73.36	70-75%	Los Angeles	5987	9.3	78.45	12.24	50.94	10.32	9.47	0.48	26.73	2.05
6037555103	32.75	63.63	60-65%	Los Angeles	4873	11	75.72	13.28	31.25	19.93	10.06	0	35.42	3.34
6037555104	31.51	61.52	60-65%	Los Angeles	4210	15.01	73.59	11.4	54.89	17.6	7.1	0.29	17.91	2.21
6037555202	15.05	25.66	25-30%	Los Angeles	3661	11.66	71.95	16.39	16.77	62.09	2.54	0	9.48	9.12
6037555211	52.24	90.31	90-95%	Los Angeles	5652	12.07	76.91	11.02	90.15	1.7	0.07	0	7.89	0.19
6037555212	40.21	75.30	75-80%	Los Angeles	5110	19.06	72.05	8.88	81.78	5.6	2.99	0	6.71	2.92
6037570001	19.80	36.94	35-40%	Los Angeles	4764	13.12	73.97	12.91	29.58	32.09	7.37	0.25	25.48	5.23
6037570002	21.96	42.04	40-45%	Los Angeles	2679	12.13	74.73	13.14	30.24	39.72	11.5	0.3	15.94	2.31
6037570003	22.94	44.33	40-45%	Los Angeles	4119	12.84	72.59	14.57	40.71	34.79	6.94	0	16.05	1.51
6037570100	56.81	93.80	90-95%	Los Angeles	3192	11.28	75.81	12.91	45.49	15.38	20.55	0	17.54	1.03
6037570202	68.20	98.68	95-100% (highest scores)	Los Angeles	6124	16.51	74.41	9.08	65.43	6.91	14.66	0.54	11.69	0.77
6037570203	69.38	98.94	95-100% (highest scores)	Los Angeles	4165	19.88	74	6.12	67.47	3.19	23.91	0	4.56	0.86
6037570204	61.03	96.27	95-100% (highest scores)	Los Angeles	4201	16.23	66.63	17.14	53.65	13.88	17.52	0.43	12.45	2.07
6037570301	71.42	99.29	95-100% (highest scores)	Los Angeles	7273	18.6	76.56	4.84	68.49	7.97	11.77	0	8.84	2.93
6037570303	51.03	88.88	85-90%	Los Angeles	4471	19.55	75.08	5.37	59.58	5.44	18.07	0	12.08	4.83
6037570304	49.59	87.42	85-90%	Los Angeles	5094	15.88	77.58	6.54	66.25	6.09	17.26	0.63	9.31	0.47
6037570402	71.21	99.23	95-100% (highest scores)	Los Angeles	3400	16.79	72.12	11.09	52.71	3.53	36.44	0	6.12	1.21
6037570403	74.37	99.60	95-100% (highest scores)	Los Angeles	4832	25.17	70.88	3.95	84.25	3.48	4.74	0	6.71	0.83
6037570404	60.46	95.98	95-100% (highest scores)	Los Angeles	3676	14.83	76.12	9.06	71.87	1.31	18.2	0	5.17	3.45
6037570501	63.67	97.34	95-100% (highest scores)	Los Angeles	8042	16.03	75.22	8.75	56.33	8.19	19.15	0	15.24	1.08
6037570502	69.39	98.95	95-100% (highest scores)	Los Angeles	6588	14.6	77.73	7.67	58.36	10.23	5.37	0.18	21.28	4.57
6037570601	47.65	85.06	85-90%	Los Angeles	5610	14.33	78.41	7.25	57.2	8.54	16.36	4.05	12.75	1.11
6037570602	48.05	85.54	85-90%	Los Angeles	6177	17.26	71.13	11.61	48.89	7.2	10.59	0	30.84	2.48
6037570603	48.72	86.41	85-90%	Los Angeles	5172	19.3	75.31	5.39	34.24	9.65	44.74	0	9.5	1.88
6037570701	38.99	73.44	70-75%	Los Angeles	7372	14.11	73.02	12.87	32.61	17.43	20.02	0	27.27	2.67
6037570702	32.32	62.99	60-65%	Los Angeles	2296	7.4	76.22	16.38	35.41	27.22	15.9	3.48	12.54	5.44
6037570800	23.05	44.64	40-45%	Los Angeles	5300	11.66	77.87	10.47	29.74	47.06	6.26	0.38	14.49	2.08
6037570901	22.24	42.62	40-45%	Los Angeles	5752	13.2	72.84	13.96	27.59	46.64	5.67	0	14.8	5.3
6037570902	16.00	27.81	25-30%	Los Angeles	3583	10.63	76.3	13.06	27.63	42.92	6.87	0	12.92	9.66
6037571000	22.51	43.28	40-45%	Los Angeles	5628	10.29	73.81	15.9	25.75	58.21	1.76	0	8.81	5.47
6037571101	20.03	37.62	35-40%	Los Angeles	4402	10.27	75.24	14.49	32.62	53.13	1.93	0	9.43	2.89
6037571102	22.17	42.47	40-45%	Los Angeles	4073	13.23	75.03	11.74	28.73	44.91	5.62	0.39	17.38	2.97
6037571200	19.89	37.25	35-40%	Los Angeles	8175	8.16	74.98	16.86	27.02	47.83	7.38	1.32	12.49	3.96
6037571300	25.23	49.29	45-50%	Los Angeles	4484	10.12	73.53	16.35	31.47	38.67	10.5	0	16.8	2.56
6037571400	35.04	67.64	65-70%	Los Angeles	4844	14.16	70.69	15.15	31.56	36.46	9.6	0	19.1	3.28
6037571502	29.16	57.19	55-60%	Los Angeles	4739	11.23	72.57	16.21	35.39	23.59	19.14	0	19.28	2.6
6037571503	29.43	57.65	55-60%	Los Angeles	3878	11.73	75.79	12.48	35.51	18.31	18.05	0	26.07	2.06

6037571504	30.20	59.09	55-60%	Los Angeles	4512	11.06	77.02	11.92	39.21	29.74	17.35	0	9.53	4.17
6037571600	44.71	81.63	80-85%	Los Angeles	2309	18.19	73.75	8.06	33.43	5.76	52.01	0	2.6	6.19
6037571701	58.34	94.67	90-95%	Los Angeles	6247	10.07	81.21	8.72	65.79	8.6	12.92	0	11.12	1.57
6037571703	47.78	85.22	85-90%	Los Angeles	3557	13.3	71.21	15.49	66.74	6.27	14.39	0	9.95	2.64
6037571704	45.08	82.10	80-85%	Los Angeles	4076	13.08	78.97	7.95	64.25	9.13	16.78	0.81	8.12	0.91
6037571800	16.01	27.87	25-30%	Los Angeles	3222	7.48	66.26	26.26	21.57	53.54	9.87	0	13.13	1.89
6037571900	30.81	60.30	60-65%	Los Angeles	5413	9.31	76.32	14.37	31.04	39.42	12.19	0.67	10.16	6.52
6037572001	24.49	47.78	45-50%	Los Angeles	5957	12.64	72.72	14.64	26.93	48.41	5.79	0	12.1	6.77
6037572002	42.11	78.21	75-80%	Los Angeles	4723	8.45	67.16	24.39	19.73	35.66	24.24	0	16.14	4.23
6037572100	45.24	82.25	80-85%	Los Angeles	1113	9.25	76.1	14.65	32.08	23.81	13.12	0.54	26.51	3.95
6037572201	41.76	77.72	75-80%	Los Angeles	5592	12.16	68.15	19.69	30.95	22.69	17.56	0	26.9	1.9
6037572202	38.11	72.34	70-75%	Los Angeles	3614	10.35	75.01	14.64	36.8	17.29	12.12	0	33.2	0.58
6037572301	69.65	99.02	95-100% (highest scores)	Los Angeles	3841	16.06	77.64	6.3	64.33	7.6	7.73	0	17.39	2.94
6037572302	51.14	89.06	85-90%	Los Angeles	3610	12.94	79.89	7.17	55.37	2.16	12.52	0	25.93	4.02
6037572400	51.08	88.98	85-90%	Los Angeles	1425	11.23	77.05	11.72	40.56	3.16	27.79	0	17.61	10.88
6037572500	59.37	95.27	95-100% (highest scores)	Los Angeles	3643	11.78	68.05	20.18	40.96	9.39	20.56	0	21.27	7.82
6037572600	56.84	93.81	90-95%	Los Angeles	5357	10.3	76.2	13.5	51.41	1.94	8.92	0.17	34.89	2.67
6037572700	50.89	88.75	85-90%	Los Angeles	5268	12.91	72.23	14.86	38.21	2.47	6.72	0.34	49.52	2.73
6037572800	60.16	95.78	95-100% (highest scores)	Los Angeles	986	4.97	87.83	7.2	30.83	18.97	32.86	0	7.61	9.74
6037572900	62.97	97.08	95-100% (highest scores)	Los Angeles	5360	15.84	75.3	8.86	68.71	3.51	5.82	0.04	18.04	3.88
6037573002	53.98	91.65	90-95%	Los Angeles	4086	16.08	81.64	2.28	73.74	5.7	14.44	0	5.24	0.88
6037573003	41.27	77.03	75-80%	Los Angeles	1843	14.11	73.14	12.75	45.47	24.96	5.43	0.6	20.78	2.77
6037573004	43.87	80.65	80-85%	Los Angeles	4577	18.44	74.28	7.28	48.26	9.53	28.08	0	12.6	1.53
6037573100	48.72	86.42	85-90%	Los Angeles	7547	13.82	78.56	7.62	56	9.05	18.96	0	10.96	5.04
6037573201	62.69	96.94	95-100% (highest scores)	Los Angeles	4597	13.47	78.92	7.61	62.87	5.26	8.27	0	22.71	0.89
6037573202	58.29	94.63	90-95%	Los Angeles	6379	16.96	75.51	7.52	59.84	4.51	15.47	2.07	17.67	0.44
6037573300	52.39	90.42	90-95%	Los Angeles	4158	17.12	74.8	8.08	40.45	3.22	17.82	0	38.5	0
6037573401	37.01	70.60	70-75%	Los Angeles	1642	12.55	73.02	14.43	37.21	25.64	16.99	0	18.15	2.01
6037573402	42.90	79.32	75-80%	Los Angeles	6384	9.38	78.85	11.76	36.4	26.46	7.3	0	26.06	3.78
6037573403	28.63	56.18	55-60%	Los Angeles	3519	11.45	74.14	14.41	20.92	35.15	15.37	0	26.26	2.3
6037573601	16.40	28.77	25-30%	Los Angeles	6402	12.93	73.21	13.86	25.29	53.39	6.9	0	9.98	4.44
6037573700	12.12	18.28	15-20%	Los Angeles	5009	16.03	68.72	15.25	28.65	54.08	2.04	0.54	8.19	6.51
6037573800	10.14	13.26	10-15%	Los Angeles	4309	12.02	73.22	14.76	19.24	61.34	1.32	5.38	7.71	5.01
6037573902	18.56	34.10	30-35%	Los Angeles	2031	6.89	67.06	26.05	23.58	55.98	4.14	0.49	10.49	5.32
6037574000	13.49	21.66	20-25%	Los Angeles	5165	11.31	72.24	16.46	18.66	60.5	4.88	0	10.24	5.71
6037574100	12.86	20.13	20-25%	Los Angeles	5014	11.75	73.04	15.22	21.32	61.55	2.59	0.34	10.37	3.83
6037574201	25.10	48.90	45-50%	Los Angeles	3100	17.68	68.39	13.94	27.68	52.87	4.06	0	11.1	4.29
6037574202	24.25	47.30	45-50%	Los Angeles	2251	7.69	68.81	23.5	39.36	45.94	5.69	0	5.55	3.47
6037574300	13.87	22.68	20-25%	Los Angeles	6052	8.66	75.12	16.23	14.38	73.17	0.71	1.01	8.26	2.48
6037574400	22.67	43.62	40-45%	Los Angeles	5474	12.48	70.17	17.35	23.24	60.27	4.48	0	7.91	4.11
6037574500	10.82	15.02	15-20%	Los Angeles	6631	12.88	69.58	17.54	16.8	64.64	5.2	0	9.03	4.33
6037574601	NA	NA	NA	Los Angeles	2276	0	100	0	22.32	53.34	3.47	0	15.6	5.27
6037574602	10.55	14.27	10-15%	Los Angeles	1291	6.35	58.17	35.48	19.29	60.26	1.47	0	14.18	4.8
6037574700	NA	NA	NA	Los Angeles	133	0	33.83	66.17	11.28	74.44	11.28	0	3.01	0
6037574800	25.54	49.96	45-50%	Los Angeles	2961	4.8	77.17	18.03	13.44	62.31	12.06	0.51	8.48	3.21
6037574901	11.23	16.00	15-20%	Los Angeles	3697	9.74	79.66	10.6	20.72	62.56	0.95	0.32	10.49	4.95
6037574902	24.47	47.74	45-50%	Los Angeles	5549	6.94	86.77	6.29	17.16	40.21	12.7	0.63	24.67	4.63
6037575001	21.26	40.46	40-45%	Los Angeles	3688	6.45	84.41	9.14	20.69	37.88	14.97	0	22.97	3.5
6037575002	27.87	54.69	50-55%	Los Angeles	4843	11.85	73.55	14.6	32.52	38.9	8.84	0	15.96	3.78
6037575101	44.84	81.81	80-85%	Los Angeles	4339	21.83	71.81	6.36	56.07	13.55	14.89	1.06	14.01	0.41
6037575102	40.34	75.55	75-80%	Los Angeles	4151	15.3	77.19	7.52	61.12	8.74	9.06	0	17.9	3.18
6037575103	38.47	72.92	70-75%	Los Angeles	5171	10.02	83.25	6.73	46.34	17.93	14.56	1.97	15.69	3.52
6037575201	45.40	82.44	80-85%	Los Angeles	4772	14.82	75.42	9.77	55.09	3.08	12.09	0	28.04	1.7
6037575202	48.51	86.17	85-90%	Los Angeles	4175	17.77	73.03	9.2	66.42	1.77	7.95	0	23.04	0.81
6037575300	59.57	95.46	95-100% (highest scores)	Los Angeles	4360	16.67	73.88	9.45	60.34	7.64	10.3	0.48	20.37	0.87
6037575401	69.66	99.03	95-100% (highest scores)	Los Angeles	4788	19.97	75.44	4.59	80.51	6.64	9.42	0.31	2.44	0.67
6037575402	64.73	97.72	95-100% (highest scores)	Los Angeles	4129	18.75	77.06	4.19	82.71	4.84	6.32	0	4.63	1.5
6037575500	NA	NA	NA	Los Angeles	93	0	74.19	25.81	87.1	12.9	0	0	0	0

6037575801	67.06	98.44	95-100% (highest scores)	Los Angeles	2254	18.06	79.64	2.31	74.49	11.98	10.78	0	2.66	0.09
6037575802	65.57	97.96	95-100% (highest scores)	Los Angeles	5664	19.28	75.87	4.86	72.44	10.61	8.14	0.26	7.59	0.95
6037575803	56.70	93.73	90-95%	Los Angeles	3229	14.37	61.01	24.62	61.16	16.79	8.05	0.34	10.5	3.16
6037575901	51.70	89.70	85-90%	Los Angeles	3553	15.06	79.45	5.49	50.58	18.41	19.87	0.39	7.51	3.24
6037575902	48.30	85.89	85-90%	Los Angeles	5208	9.95	79.99	10.06	35	37.98	15.4	0	6.85	4.76
6037576001	42.19	78.29	75-80%	Los Angeles	5174	3.9	86.92	9.18	12.74	50.93	13.72	0	20.2	2.42
6037576200	51.17	89.08	85-90%	Los Angeles	5324	8.21	83.81	7.98	35.07	29.79	20.17	0	6.4	8.56
6037576301	48.23	85.80	85-90%	Los Angeles	4165	12.63	74.86	12.51	44.11	13.28	21.66	1.06	15.27	4.63
6037576302	53.63	91.40	90-95%	Los Angeles	4077	14.08	80.23	5.69	54.82	11.21	11.45	0	20.6	1.91
6037576401	43.45	80.08	80-85%	Los Angeles	5021	17.11	76.92	5.97	66.6	6.01	11.35	0	9.46	6.57
6037576402	39.45	74.05	70-75%	Los Angeles	5015	15.35	78.48	6.16	67.3	9.45	12.62	0.04	9.27	1.32
6037576403	39.15	73.70	70-75%	Los Angeles	5140	20.93	73.35	5.72	59.67	11.4	17.18	0	11.22	0.53
6037576501	39.61	74.29	70-75%	Los Angeles	2986	9.78	76.26	13.97	43.07	27.7	12.06	0	8	9.18
6037576502	32.10	62.59	60-65%	Los Angeles	4658	10.52	85.36	4.12	48.5	32.12	11.31	0.84	5.13	2.1
6037576503	26.70	52.43	50-55%	Los Angeles	4469	7.7	84.56	7.74	39.81	32.76	16.4	1.12	5.33	4.59
6037576601	33.77	65.48	65-70%	Los Angeles	4293	5.1	82.18	12.72	30.65	53.83	10.37	0	3.38	1.77
6037576602	22.36	42.99	40-45%	Los Angeles	4423	5.22	82.61	12.16	25.28	56.21	6.94	0	6.4	5.18
6037576700	11.95	17.79	15-20%	Los Angeles	3935	6.68	70.24	23.07	15.4	62.41	8.87	0	9.89	3.43
6037576801	20.51	38.82	35-40%	Los Angeles	4070	8.4	81.6	10	39.24	37.13	12.48	0	11.13	0.02
6037576802	19.50	36.22	35-40%	Los Angeles	4061	8.47	82.02	9.51	19.08	40.53	26.87	0	10.64	2.88
6037576901	43.36	79.97	75-80%	Los Angeles	5357	15.1	78.64	6.25	56.41	11.52	12.39	0	18.74	0.93
6037576903	39.02	73.52	70-75%	Los Angeles	3644	7.96	84.11	7.93	54.42	16.79	12.35	0	15.29	1.15
6037576904	24.86	48.42	45-50%	Los Angeles	3157	9.6	83.34	7.06	41.4	29.71	13.78	0	10.55	4.56
6037577000	38.17	72.43	70-75%	Los Angeles	7288	10.07	84.19	5.74	24.22	41.63	11.87	0.44	17.82	4.02
6037577100	15.99	27.77	25-30%	Los Angeles	7185	12.37	77.84	9.78	26.5	54.04	6.64	0	8.28	4.54
6037577200	11.53	16.67	15-20%	Los Angeles	5848	3.49	85.81	10.7	22.66	63.01	6.94	0	5.57	1.81
6037577300	12.02	18.04	15-20%	Los Angeles	5431	5.86	81.38	12.76	19.65	68.64	1.9	0	5.91	3.9
6037577400	11.11	15.68	15-20%	Los Angeles	2947	8.38	77.43	14.18	19.65	74.35	1.46	0	3.33	1.22
6037577501	9.40	11.42	10-15%	Los Angeles	3370	3.23	62.91	33.86	11.42	78.75	1.42	0	5.73	2.67
6037577504	8.58	9.78	5-10%	Los Angeles	1378	4.64	71.12	24.24	6.53	80.91	1.02	0	6.89	4.64
6037577602	25.22	49.27	45-50%	Los Angeles	3259	9.33	59.56	31.11	10.06	66.92	4.82	0.37	14.76	3.07
6037577603	19.74	36.86	35-40%	Los Angeles	8457	8.14	69.41	22.45	15.47	65.99	4.94	0.48	11.08	2.03
6037577604	6.29	5.33	5-10%	Los Angeles	1367	3.73	65.69	30.58	18	69.79	1.9	0	7.97	2.34
6037599000	17.63	31.91	30-35%	Los Angeles	3684	6.32	79.23	14.44	55.92	42.56	0.11	0	0.08	1.33
6037599100	NA	NA	NA	Los Angeles	483	0	85.3	14.7	9.73	72.05	2.9	0	13.67	1.66
6037600100	55.12	92.60	90-95%	Los Angeles	7410	16.32	75.59	8.1	74.89	0.61	23.7	0	0.28	0.53
6037600201	38.31	72.62	70-75%	Los Angeles	5063	20.23	75.07	4.7	56.35	1.28	41.28	0.16	0.04	0.89
6037600202	46.54	83.90	80-85%	Los Angeles	7767	19.18	67.62	13.2	64.12	1.66	33.81	0	0.01	0.4
6037600302	46.29	83.59	80-85%	Los Angeles	3086	9.95	71.55	18.5	37.14	0.52	60.01	0	0.39	1.94
6037600303	55.33	92.80	90-95%	Los Angeles	3883	15.35	76.02	8.63	64	1.88	33.4	0	0.05	0.67
6037600304	51.26	89.18	85-90%	Los Angeles	3910	15.68	79.13	5.19	63.63	0.13	33.4	0.56	1.13	1.15
6037600400	40.91	76.49	75-80%	Los Angeles	4147	15.24	64.55	20.21	15.67	2.44	78.1	0	0	3.79
6037600501	36.91	70.44	70-75%	Los Angeles	2712	14.97	65.27	19.76	23.53	1.4	70.1	0	1.81	3.17
6037600502	59.14	95.17	95-100% (highest scores)	Los Angeles	2097	10.01	75.2	14.78	47.54	6.44	40.92	0	4.05	1.05
6037600601	36.17	69.47	65-70%	Los Angeles	2653	12.48	64.57	22.96	13.12	2.34	79.57	0.3	0.11	4.56
6037600602	48.44	86.06	85-90%	Los Angeles	2542	17.55	76.08	6.37	62.39	2.44	33.01	0	1.73	0.43
6037600702	32.01	62.42	60-65%	Los Angeles	4306	11.43	77.47	11.1	19.09	3.23	76.73	0	0	0.95
6037600703	30.59	59.81	55-60%	Los Angeles	1783	7.74	68.76	23.5	8.02	0.67	81.77	0	1.79	7.74
6037600704	33.94	65.71	65-70%	Los Angeles	3373	6.97	69.7	23.33	11.53	5.19	79.34	0	1.84	2.1
6037600801	26.14	51.20	50-55%	Los Angeles	3199	12.69	66.36	20.94	11.72	1.19	81.12	0	1.63	4.35
6037600802	37.81	71.77	70-75%	Los Angeles	2485	3.02	78.59	18.39	8.49	1.13	84.71	0	2.82	2.86
6037600902	52.56	90.58	90-95%	Los Angeles	6491	17.02	70.62	12.36	52.58	3.14	37.65	0	1.29	5.33
6037600911	31.25	61.16	60-65%	Los Angeles	3146	4.35	87.44	8.2	52.92	10.11	33.34	0	0	3.62
6037600912	48.93	86.64	85-90%	Los Angeles	5659	11.45	80.08	8.46	78.69	4.95	13.91	0	0.55	1.91
6037601001	42.31	78.45	75-80%	Los Angeles	2381	13.02	58.5	28.48	33.6	2.44	60.73	0	0.71	2.52
6037601002	47.66	85.07	85-90%	Los Angeles	5167	10.8	76.5	12.7	39.69	1.88	45.81	3.93	1.95	6.74
6037601100	48.20	85.74	85-90%	Los Angeles	6869	16.01	73.11	10.87	61.84	1.97	28.99	0.79	4.82	1.6
6037601202	39.70	74.52	70-75%	Los Angeles	4000	12.53	77.4	10.08	86.2	6.65	3.9	0	2.28	0.98

6037601211	47.02	84.52	80-85%	Los Angeles	2880	16.67	73.3	10.03	53.65	3.47	37.4	0	1.21	4.27
6037601212	44.85	81.83	80-85%	Los Angeles	6774	17.05	74.11	8.84	56.38	4.16	31.64	0.19	6.61	1.02
6037601301	34.19	66.26	65-70%	Los Angeles	1921	11.45	72.05	16.5	21.4	13.22	57.63	0.31	3.44	4.01
6037601302	57.37	94.10	90-95%	Los Angeles	7333	15.76	77.59	6.64	30.38	10.65	53.85	0.03	3.26	1.83
6037601303	41.06	76.75	75-80%	Los Angeles	5084	12.88	75.81	11.31	33.91	6.65	50.47	0.47	3.98	4.52
6037601401	64.97	97.83	95-100% (highest scores)	Los Angeles	5949	11.06	76.74	12.2	50.85	7.43	33.17	0.27	4.12	4.17
6037601402	54.28	91.87	90-95%	Los Angeles	4793	14.71	74.69	10.6	91.13	4.82	1.23	0	1.71	1.11
6037601501	57.97	94.50	90-95%	Los Angeles	3918	14.55	81.44	4.01	88.41	1.33	5.13	0	4.93	0.2
6037601502	67.99	98.59	95-100% (highest scores)	Los Angeles	4059	16.73	78.47	4.8	93.77	2.59	0.76	0	2.88	0
6037601600	64.43	97.60	95-100% (highest scores)	Los Angeles	4439	15.45	73.98	10.57	86.08	1.24	0.92	0	10.61	1.15
6037601700	56.55	93.66	90-95%	Los Angeles	5126	14.01	81.27	4.72	86.99	0.21	7.94	0	1.66	3.2
6037601801	43.23	79.84	75-80%	Los Angeles	2834	16.13	76.01	7.87	95.62	0.18	2.22	0.46	1.27	0.25
6037601802	42.06	78.16	75-80%	Los Angeles	3945	14.73	78.96	6.31	90.42	2.76	3.57	0.2	3.04	0
6037601900	48.81	86.54	85-90%	Los Angeles	4847	18.42	74.56	7.01	84.79	0.68	12.73	0.85	0.19	0.76
6037602002	58.10	94.55	90-95%	Los Angeles	3057	14.33	76.12	9.55	76.32	3.76	13.77	0	4.38	1.77
6037602003	49.45	87.34	85-90%	Los Angeles	4760	14.71	75.95	9.35	86.97	1.58	9.56	0	1.28	0.61
6037602004	53.35	91.20	90-95%	Los Angeles	3709	12.89	76.73	10.38	66.95	6.66	23.81	0	2.08	0.51
6037602103	56.36	93.48	90-95%	Los Angeles	6650	14.51	76.27	9.22	70.75	2.36	19.37	0	4.45	3.07
6037602104	54.55	92.13	90-95%	Los Angeles	6091	20.42	74.09	5.48	72.91	4.37	18.88	0	2.86	0.99
6037602105	51.12	89.03	85-90%	Los Angeles	4116	13.68	78.33	7.99	67.4	11.03	16.03	0	4.76	0.78
6037602106	46.12	83.41	80-85%	Los Angeles	5403	16.16	73.11	10.73	56.69	12.88	15.6	0	13.44	1.39
6037602200	47.22	84.67	80-85%	Los Angeles	7200	13.28	76.28	10.44	46.15	21.99	15.15	0.04	10.62	6.06
6037602301	49.02	86.74	85-90%	Los Angeles	6311	11.66	76.39	11.95	60.55	27.03	4.61	0	5.26	2.55
6037602302	32.60	63.44	60-65%	Los Angeles	4819	18.88	70.08	11.04	17.14	53.52	1.95	0	20.13	7.26
6037602402	44.39	81.32	80-85%	Los Angeles	6869	14.95	74.22	10.83	60.04	13.28	12.01	0	12.14	2.53
6037602403	38.44	72.88	70-75%	Los Angeles	5199	14.18	75.23	10.6	65.17	6.06	17.12	0	10.58	1.08
6037602404	35.88	68.97	65-70%	Los Angeles	5457	15.08	75.88	9.03	65.05	7.79	13.05	0	8.63	5.48
6037602504	36.32	69.62	65-70%	Los Angeles	4961	14.53	80.87	4.6	45.25	9.41	35.68	0	8.22	1.43
6037602505	44.67	81.57	80-85%	Los Angeles	4590	22.27	73.01	4.73	56.88	7.04	32	0	1.31	2.77
6037602506	38.06	72.24	70-75%	Los Angeles	4297	17.92	77.08	5	47.57	4.17	37.07	0	4.35	6.84
6037602507	38.96	73.37	70-75%	Los Angeles	5122	17.77	74.7	7.54	33.07	4.39	56.64	0	5.33	0.57
6037602508	49.34	87.23	85-90%	Los Angeles	6922	16.08	76.61	7.31	51.6	8.21	31.05	0	7.09	2.05
6037602509	57.83	94.43	90-95%	Los Angeles	4457	13.13	76.49	10.39	62.51	3.16	17.52	0.04	16.18	0.58
6037602600	52.08	90.13	90-95%	Los Angeles	8118	11.12	66.99	21.89	17.01	5.85	62.79	0	8.72	5.63
6037602700	52.14	90.17	90-95%	Los Angeles	3770	7.27	76.82	15.92	25.15	5.7	62.12	0.03	3.77	3.24
6037602801	65.91	98.07	95-100% (highest scores)	Los Angeles	3718	19.1	72.89	8.02	57.58	0.32	38.92	0	0.81	2.37
6037602802	53.17	91.00	90-95%	Los Angeles	5019	11.74	69.34	18.93	39.57	0.66	58.12	0	1.42	0.24
6037602900	68.75	98.84	95-100% (highest scores)	Los Angeles	4443	14.09	77.02	8.89	76.12	3.06	13.84	0	5.24	1.73
6037603001	57.34	94.09	90-95%	Los Angeles	7498	10.24	73.9	15.86	42.57	2.84	30.18	0	23.47	0.93
6037603004	33.47	64.89	60-65%	Los Angeles	1549	9.17	68.04	22.79	29.57	4.45	27.37	0	38.15	0.45
6037603005	50.27	88.20	85-90%	Los Angeles	5928	16.06	76.28	7.66	42.48	5.8	30.53	0	18.39	2.8
6037603006	39.66	74.39	70-75%	Los Angeles	1898	10.64	75.29	14.07	38.57	13.59	4.9	0	42.15	0.79
6037603101	43.32	79.93	75-80%	Los Angeles	4139	9.95	75.36	14.69	41.99	13.36	13.75	0	27.73	3.17
6037603102	52.19	90.24	90-95%	Los Angeles	3664	11.35	68.31	20.33	45.93	10.89	11.44	0.22	28.68	2.84
6037603200	45.90	83.08	80-85%	Los Angeles	3394	9.28	67.24	23.48	34.35	11.67	12.82	0	36.86	4.3
6037603301	48.31	85.92	85-90%	Los Angeles	3617	10.23	70.67	19.1	31.63	11.25	3.7	0	47.08	6.33
6037603302	58.71	94.92	90-95%	Los Angeles	4048	9.34	69.17	21.49	37.08	10.57	6	1.26	42.91	2.17
6037603400	46.62	83.98	80-85%	Los Angeles	4113	11.5	71.12	17.38	40.02	15.12	11.06	0	30.35	3.45
6037603500	48.35	85.99	85-90%	Los Angeles	3042	10.22	73.87	15.91	47.07	12.75	11.41	0	24.36	4.4
6037603600	32.52	63.34	60-65%	Los Angeles	4258	10.03	73.56	16.42	35.23	21.65	8.81	0	31.09	3.22
6037603702	38.32	72.66	70-75%	Los Angeles	4777	8.94	70.46	20.6	36.53	31.25	2.18	0	28.53	1.51
6037603703	36.73	70.15	70-75%	Los Angeles	2491	10.2	73.71	16.1	41.43	26.7	1.85	5.18	19.59	5.26
6037603704	46.99	84.44	80-85%	Los Angeles	6609	17.76	75.58	6.66	62.48	4.09	25.47	0	4.33	3.65
6037603801	40.89	76.45	75-80%	Los Angeles	4748	12.03	77.99	9.98	58.26	11.5	17.06	0.48	9.46	3.24
6037603802	46.81	84.20	80-85%	Los Angeles	4040	15.72	72.55	11.73	62.05	12.35	6.73	0.25	16.51	2.1
6037603900	49.21	87.07	85-90%	Los Angeles	7666	16.49	72.53	10.98	67.04	10.61	9.34	0	11.11	1.9
6037604001	39.26	73.83	70-75%	Los Angeles	4207	9.79	80.75	9.46	61.8	14.55	7.8	0	14.57	1.28
6037604002	36.69	70.08	70-75%	Los Angeles	4856	9.02	80.17	10.81	54.98	19.21	7.68	0	16.26	1.85

6037604100	47.31	84.80	80-85%	Los Angeles	7302	12.83	78.06	9.11	61.8	18.87	9.34	0.33	7.52	2.14
6037609900	22.00	42.16	40-45%	Los Angeles	2057	13.03	62.42	24.55	59.55	25.86	2.38	0	6.47	5.74
6037620001	10.69	14.64	10-15%	Los Angeles	4251	15.03	72.24	12.73	17.69	63.4	4.66	0	7.79	6.47
6037620002	26.83	52.71	50-55%	Los Angeles	3493	12.37	77.35	10.28	14.51	62.04	0.03	0	17.75	5.67
6037620101	19.41	35.96	35-40%	Los Angeles	5632	16.28	75.44	8.27	13.6	59.11	6.91	0	10.35	10.03
6037620102	15.33	26.27	25-30%	Los Angeles	3355	12.07	76.27	11.65	20.39	65.1	1.13	0	5.25	8.14
6037620201	11.81	17.35	15-20%	Los Angeles	1529	8.76	81.95	9.29	6.47	83.71	1.24	0.46	5.17	2.94
6037620301	4.32	2.08	1-5% (lowest scores)	Los Angeles	4819	13.3	71.32	15.38	9.01	78.05	0.33	1.18	6.14	5.29
6037620303	4.22	1.95	1-5% (lowest scores)	Los Angeles	4502	15.73	67.15	17.13	4	77.5	0.02	0	12.51	5.98
6037620305	8.04	8.61	5-10%	Los Angeles	5845	13.5	70.16	16.34	8.52	77.5	0.96	0	11.44	1.57
6037620400	11.49	16.57	15-20%	Los Angeles	5279	10.61	69.96	19.44	9.43	68.33	0	0	16.71	5.53
6037620501	16.38	28.71	25-30%	Los Angeles	5726	14.63	72.44	12.92	15.07	55.64	6.57	0.98	13.9	7.84
6037620521	16.66	29.50	25-30%	Los Angeles	3958	17.46	74.25	8.29	13.62	60.69	1.47	0	15.56	8.67
6037620522	8.92	10.49	10-15%	Los Angeles	5024	16.98	73.25	9.77	16.24	53.98	1.91	0	15.33	12.54
6037620601	19.20	35.64	35-40%	Los Angeles	5278	17.66	72.02	10.33	24.78	48.26	2.6	0	19.57	4.79
6037620602	10.58	14.36	10-15%	Los Angeles	5040	10.93	73.77	15.3	19.38	59.15	0	0.28	16.33	4.86
6037620701	8.00	8.51	5-10%	Los Angeles	7211	14.23	73.07	12.7	14.81	59.03	6.68	0.6	11.44	7.43
6037620702	11.89	17.64	15-20%	Los Angeles	7375	15.57	71.89	12.54	14.75	60.68	2.83	0	15.62	6.12
6037620800	9.13	10.91	10-15%	Los Angeles	7844	14.78	68.03	17.2	9.68	63.05	0.51	0	22.94	3.82
6037620901	3.98	1.50	1-5% (lowest scores)	Los Angeles	2785	12.78	67.65	19.57	8.69	69.01	0.83	0	15.83	5.64
6037620904	3.08	0.72	1-5% (lowest scores)	Los Angeles	2897	12.6	70.8	16.6	4.42	85.71	0	0	2.35	7.53
6037621001	5.37	3.64	1-5% (lowest scores)	Los Angeles	4373	11.09	71.44	17.47	10.93	73.5	0.64	1.6	6.33	7
6037621002	6.46	5.65	5-10%	Los Angeles	879	5.57	75.54	18.89	3.3	88.96	0.68	0	6.26	0.8
6037621004	10.70	14.65	10-15%	Los Angeles	4086	6.98	77.85	15.17	9.47	81.67	0.07	0	4.8	3.99
6037621102	7.15	7.05	5-10%	Los Angeles	3069	14.76	74.03	11.21	10.59	72.04	0.59	0.98	5.51	10.3
6037621104	9.85	12.52	10-15%	Los Angeles	7132	11.68	81.03	7.29	8.58	79.8	1.92	0.27	4.43	5.01
6037621201	13.15	20.80	20-25%	Los Angeles	6724	12.97	74.38	12.66	25.46	56.83	0.62	0.55	10.29	6.25
6037621204	19.14	35.50	35-40%	Los Angeles	3052	5.28	73.07	21.66	11.21	64.68	5.21	0	14.55	4.36
6037621301	12.94	20.42	20-25%	Los Angeles	6973	13.55	73.74	12.71	10.74	65.98	3.27	0	14.03	5.98
6037621324	10.46	13.98	10-15%	Los Angeles	3740	7.27	78.61	14.12	11.18	67.67	2.54	0	11.76	6.84
6037621326	8.44	9.51	5-10%	Los Angeles	3017	4.84	76.33	18.83	14.48	72.79	1.72	0	6.07	4.94
6037621400	7.51	7.69	5-10%	Los Angeles	4305	10.78	72.89	16.33	10.55	69.59	4.11	0.77	9.57	5.41
6037650001	28.11	55.21	55-60%	Los Angeles	5805	8.66	71.85	19.48	28.84	21.34	1.98	0.21	43.15	4.48
6037650003	34.01	65.85	65-70%	Los Angeles	3202	9.9	76.64	13.46	37.85	23.2	5.81	0	25.95	7.18
6037650004	22.47	43.22	40-45%	Los Angeles	4125	12.63	76.48	10.88	19.66	27.25	6.28	0	40.9	5.92
6037650101	32.24	62.82	60-65%	Los Angeles	6018	8.36	70.37	21.27	22.95	17.81	1.31	0.33	51.38	6.21
6037650102	28.75	56.42	55-60%	Los Angeles	2211	8.77	76.26	14.97	26.1	32.43	1.9	0	33.6	5.97
6037650200	32.58	63.40	60-65%	Los Angeles	5930	11.52	71.67	16.81	28.08	37.72	1.4	0.25	27.6	4.94
6037650300	33.49	64.94	60-65%	Los Angeles	6824	13.01	70.94	16.05	24.71	31.48	4.44	0.88	32.46	6.04
6037650401	27.84	54.60	50-55%	Los Angeles	4758	11.03	74.15	14.82	15.62	44.54	0.84	0	33.73	5.28
6037650501	15.79	27.33	25-30%	Los Angeles	3044	12.06	66	21.94	15.08	51.38	0	0.39	27.96	5.19
6037650502	8.87	10.39	10-15%	Los Angeles	4259	11.06	70.09	18.85	21.98	42.66	4.91	0	27.19	3.26
6037650602	31.00	60.63	60-65%	Los Angeles	7315	13.89	71.26	14.85	11.2	24.24	5.71	0	56.33	2.53
6037650603	18.71	34.53	30-35%	Los Angeles	3849	7.59	70.85	21.56	7.95	43.47	5.79	0	39.62	3.17
6037650604	27.01	53.03	50-55%	Los Angeles	5567	13.1	74.42	12.48	13.81	31.58	2.16	0.31	50.24	1.9
6037650605	22.54	43.38	40-45%	Los Angeles	3064	12.89	76.57	10.54	15.31	35.22	1.24	0.69	43.24	4.31
6037650701	20.82	39.60	35-40%	Los Angeles	2529	13.92	62.04	24.04	17.12	51.72	1.19	0	28.71	1.27
6037650702	6.93	6.63	5-10%	Los Angeles	4731	11.44	71.59	16.97	16.15	56.03	0.3	0	21.9	5.62
6037650800	22.08	42.33	40-45%	Los Angeles	6423	13.73	68.38	17.89	6.04	24.99	1.81	0	62.18	4.98
6037650901	34.17	66.20	65-70%	Los Angeles	5366	13.75	69.79	16.46	31.16	37.72	2.63	0	23.37	5.12
6037650902	29.32	57.48	55-60%	Los Angeles	6769	15.85	71.78	12.37	29.99	25.04	1.03	0.43	37.78	5.73
6037651001	22.67	43.63	40-45%	Los Angeles	5444	10.56	71.47	17.96	35.03	32.66	1.36	0	26.85	4.1
6037651002	27.13	53.29	50-55%	Los Angeles	4702	9.19	72.2	18.61	20.78	33.16	5.13	1.38	35.03	4.53
6037651101	24.61	48.00	45-50%	Los Angeles	5036	12.75	65.77	21.49	7.45	37.47	0.93	2.2	49.01	2.94
6037651102	21.86	41.93	40-45%	Los Angeles	3534	10.38	63.21	26.4	15.17	45.3	1.78	0	34.63	3.11
6037651201	13.25	21.04	20-25%	Los Angeles	5018	9.47	72.9	17.64	14.53	59.23	1.08	0	20.47	4.7
6037651221	23.88	46.43	45-50%	Los Angeles	3697	15.9	70.79	13.31	14.61	28.59	5.22	0.27	47.47	3.84
6037651222	20.42	38.50	35-40%	Los Angeles	6459	13.49	77.89	8.62	15.71	32.22	4.13	0	44.62	3.31

6037651302	11.85	17.50	**15-20%**	Los Angeles	6204	12.77	66.92	20.31	11.67	62.17	2.84	0.23	13.8	9.3
6037651304	14.32	23.87	**20-25%**	Los Angeles	4852	8.55	72.05	19.39	11.13	69.08	4.14	0	5.71	9.93
6037651401	15.93	27.62	**25-30%**	Los Angeles	2521	10.59	64.97	24.43	9.2	59.34	0.75	0	28.16	2.54
6037651402	21.74	41.63	**40-45%**	Los Angeles	6236	12.38	72.19	15.43	11.23	38.97	0.5	2.05	39.43	7.83
6037670001	26.77	52.57	**50-55%**	Los Angeles	3406	8.6	70.43	20.96	34.38	37.58	8.07	0	15	4.96
6037670002	25.29	49.42	**45-50%**	Los Angeles	3939	13.25	68.88	17.87	38.54	32.09	5.05	1.32	19.24	3.76
6037670003	22.74	43.90	**40-45%**	Los Angeles	5707	11.99	74.07	13.95	30.24	47.59	2.3	0	17.28	2.59
6037670100	29.34	57.51	**55-60%**	Los Angeles	6642	15.88	64.15	19.96	30.38	36.98	9.76	0	15.69	7.2
6037670201	4.49	2.28	**1-5% (lowest scores)**	Los Angeles	3820	10.6	67.23	22.17	10.52	64.01	0.68	0	21.54	3.25
6037670202	11.52	16.65	**15-20%**	Los Angeles	2637	12.67	64.92	22.41	18.24	55.86	0.95	0	20.25	4.7
6037670324	8.04	8.59	**5-10%**	Los Angeles	5091	11.1	63.78	25.12	7.78	74.17	0.57	0	14.59	2.89
6037670326	6.06	4.80	**1-5% (lowest scores)**	Los Angeles	3613	9.66	59.31	31.03	7.31	59.42	0	0.06	31.19	2.02
6037670328	6.47	5.66	**5-10%**	Los Angeles	4730	4.78	69.15	26.07	8.14	60.44	0.47	0	25.64	5.31
6037670403	11.56	16.73	**15-20%**	Los Angeles	2733	8.85	65.39	25.76	4.24	52.03	0.95	0	38.6	4.17
6037670405	5.12	3.21	**1-5% (lowest scores)**	Los Angeles	2864	7.89	57.37	34.74	1.82	56.81	2.09	0	34.88	4.4
6037670406	3.88	1.35	**1-5% (lowest scores)**	Los Angeles	1759	8.53	64.07	27.4	1.19	42.75	5.34	0.34	45.82	4.55
6037670407	9.48	11.64	**10-15%**	Los Angeles	6269	10.62	73.03	16.35	9.01	30.42	3.08	0	53.83	3.67
6037670411	4.74	2.62	**1-5% (lowest scores)**	Los Angeles	4356	8.91	68.2	22.89	4.91	61.5	1.81	0	26.06	5.72
6037670413	7.13	7.00	**5-10%**	Los Angeles	4433	11.21	61.63	27.16	7.81	42.54	0.83	0	47.01	1.8
6037670416	16.61	29.36	**25-30%**	Los Angeles	4513	7.71	64.92	27.37	16.09	36.89	5.27	0.69	34.72	6.34
6037670500	4.91	2.90	**1-5% (lowest scores)**	Los Angeles	1513	4.82	62.26	32.91	5.82	71.32	1.45	0	15.6	5.82
6037670602	9.10	10.85	**10-15%**	Los Angeles	6862	6.5	63.83	29.67	8.07	59.15	1.17	0	22.63	8.98
6037670701	9.31	11.21	**10-15%**	Los Angeles	7185	11.54	65.21	23.26	25.62	49.99	0.4	0.22	20.18	3.58
6037670702	3.53	1.02	**1-5% (lowest scores)**	Los Angeles	5649	7.97	65.59	26.45	8.43	68.53	1.12	0.42	15.29	6.21
6037700101	29.56	57.93	**55-60%**	Los Angeles	5200	4.29	74.54	21.17	10.46	81.12	3.44	0.08	3.29	1.62
6037700102	35.16	67.84	**65-70%**	Los Angeles	4506	2.86	80.98	16.16	13.12	69.91	5.55	0	6.48	4.95
6037700200	21.09	40.17	**40-45%**	Los Angeles	7446	4.78	85.59	9.63	9.91	73.29	4.85	0.58	4.86	6.51
6037700300	17.93	32.53	**30-35%**	Los Angeles	6223	2.33	80.94	16.73	7.75	79.05	2.59	0	4.35	6.27
6037700400	19.72	36.79	**35-40%**	Los Angeles	5162	3.86	81.77	14.37	7.48	77.22	1.49	0	6.84	6.97
6037700501	14.83	25.10	**25-30%**	Los Angeles	3526	2.35	85.73	11.91	13.67	65.4	6.44	0	11.03	3.46
6037700502	25.00	48.71	**45-50%**	Los Angeles	4387	1.64	83.75	14.61	11.92	78.5	1.12	0	6.95	1.5
6037700600	15.82	27.41	**25-30%**	Los Angeles	5021	7.97	65.13	26.91	2.91	89.62	0.66	0	1.49	5.32
6037700700	17.06	30.57	**30-35%**	Los Angeles	3575	9.73	72.98	17.29	4.67	86.18	0.08	0.48	3.27	5.31
6037700801	22.87	44.10	**40-45%**	Los Angeles	4610	4.62	60.52	34.86	6.75	72.65	1.65	0	14.19	4.77
6037700802	25.73	50.43	**50-55%**	Los Angeles	4092	6.52	72.19	21.29	10.78	68.62	7.77	0	10.9	1.93
6037700901	18.07	32.90	**30-35%**	Los Angeles	3600	7.03	79.69	13.28	6.72	73.94	1.17	0	12.78	5.39
6037700902	19.91	37.36	**35-40%**	Los Angeles	7352	10.47	73.61	15.91	6.86	74.4	1.73	0	12.73	4.28
6037701000	20.36	38.43	**35-40%**	Los Angeles	5936	12.8	66.86	20.33	3.47	79.7	1.11	0.76	6.89	8.07
6037701100	38.72	73.13	**70-75%**	Los Angeles	1101	2.82	77.75	19.44	26.52	36.78	22.43	0	9.63	4.63
6037701201	12.02	18.02	**15-20%**	Los Angeles	4088	12.55	62.55	24.9	8.32	78.01	0	0	10.84	2.84
6037701202	13.93	22.79	**20-25%**	Los Angeles	3381	13.07	68.62	18.31	5.21	78.94	3.28	0	9.64	2.93
6037701302	18.20	33.26	**30-35%**	Los Angeles	4868	5.79	81.49	12.72	8.16	77.53	0.06	0	10.62	3.64
6037701304	14.10	23.31	**20-25%**	Los Angeles	6212	10.69	64.47	24.84	9.48	75.71	1.45	0	8.77	4.59
6037701402	21.37	40.78	**40-45%**	Los Angeles	5577	3.86	69.68	26.47	9.38	72.98	6.19	0	6.67	4.79
6037701501	13.00	20.52	**20-25%**	Los Angeles	5267	12.51	69.34	18.15	6.63	72.89	1.96	0	9.84	8.7
6037701502	20.66	39.20	**35-40%**	Los Angeles	3530	5.27	71.13	23.6	11.16	69.26	2.8	0	12.8	3.97
6037701601	18.42	33.70	**30-35%**	Los Angeles	4194	10.85	67.48	21.67	6.37	72.06	0.67	0	13.33	7.58
6037701602	24.88	48.47	**45-50%**	Los Angeles	3987	9.61	78.48	11.91	17.73	59.19	6.45	0	11.56	5.07
6037701701	38.21	72.48	**70-75%**	Los Angeles	3305	8.68	74.7	16.61	20.3	56.46	6.57	0.7	9.41	6.57
6037701702	35.94	69.05	**65-70%**	Los Angeles	3437	8.29	77.86	13.85	21.3	54.52	7.24	0.32	12.25	4.36
6037701801	47.52	84.95	**80-85%**	Los Angeles	7001	9.56	78.12	12.33	37.88	31.51	7.9	0	21.09	1.61
6037701802	44.08	80.95	**80-85%**	Los Angeles	4645	3.88	85.92	10.2	38.41	39.29	8.93	0.32	7.06	5.98
6037701902	44.27	81.19	**80-85%**	Los Angeles	4659	4.38	74.54	21.08	8.39	66.22	13.18	0	6.2	6.01
6037702002	27.46	53.88	**50-55%**	Los Angeles	6443	7.87	78.26	13.88	20.3	62.86	6.84	0	4.89	5.11
6037702102	25.65	50.26	**50-55%**	Los Angeles	6065	6.28	76.42	17.3	10.73	72.96	2.79	0.43	5.85	7.24
6037702201	24.97	48.64	**45-50%**	Los Angeles	4110	7.27	78.81	13.92	12.94	66.67	2.55	0	10.49	7.35
6037702202	17.27	31.00	**30-35%**	Los Angeles	3969	10.38	69.99	19.63	16.33	66.82	1.99	0	7.73	7.13
6037702300	23.25	45.02	**45-50%**	Los Angeles	6839	13	69.73	17.27	14.42	64.42	1.71	0.16	9.91	9.37

6037702400	35.43	68.31	65-70%	Los Angeles	4367	8.36	78.73	12.92	28.37	44.86	6.87	0	14.7	5.2
6037702501	17.44	31.34	30-35%	Los Angeles	4965	11.7	74.52	13.78	18.37	61.83	2.66	0	12.79	4.35
6037702502	26.84	52.74	50-55%	Los Angeles	3757	10.75	61.62	27.63	16.02	50.89	16.53	0	13.92	2.64
6037702600	31.14	60.91	60-65%	Los Angeles	6389	7.51	71.09	21.4	19.52	46.38	7.39	0	18.68	8.03
6037702700	25.65	50.24	50-55%	Los Angeles	3435	11.99	75.08	12.93	20.55	51.38	2.47	0	15.95	9.64
6037702801	33.31	64.59	60-65%	Los Angeles	4679	10.6	72.94	16.46	34.54	38.09	3.8	0.17	19.04	4.36
6037702802	27.97	54.90	50-55%	Los Angeles	2293	10.12	73.7	16.18	37.9	50.94	2.05	0	6.41	2.7
6037702803	44.00	80.82	80-85%	Los Angeles	3063	16	69.41	14.59	40.84	36.86	3.49	1.5	12.31	5
6037702901	20.07	37.68	35-40%	Los Angeles	9852	6.28	83.34	10.37	10.84	66.59	7.41	0	11.11	4.06
6037703001	24.62	48.01	45-50%	Los Angeles	6503	12.64	74.24	13.12	13.06	34.6	23.9	0	22.67	5.78
6037703002	24.09	46.95	45-50%	Los Angeles	6721	5.58	68.64	25.78	5.4	11.9	72.52	0	4.21	5.97
6037703100	29.90	58.46	55-60%	Los Angeles	6068	7.76	69.46	22.78	8.24	6.54	75.23	1.35	2.26	6.38
6037703200	32.42	63.21	60-65%	Los Angeles	5688	7.77	69.83	22.4	7.82	5.98	80.89	0	2.76	2.55
6037800101	7.03	6.82	5-10%	Los Angeles	5738	9.03	69.48	21.49	3.69	80.38	1.08	0	6.4	8.45
6037800102	9.04	10.68	10-15%	Los Angeles	7213	8.85	73.05	18.11	10.73	78.68	1.25	1.54	4.96	2.84
6037800202	12.20	18.46	15-20%	Los Angeles	6065	12.02	70.68	17.3	9.96	79.59	0.43	0	6.68	3.35
6037800203	15.20	26.02	25-30%	Los Angeles	5533	9.99	75.26	14.75	9.11	81.02	1.08	0	6.69	2.1
6037800204	24.86	48.44	45-50%	Los Angeles	4495	9.88	64.14	25.98	10.32	76.35	0.62	1.76	8.65	2.29
6037800324	12.33	18.84	15-20%	Los Angeles	6966	13.26	70.41	16.32	9.7	76.33	2.83	0	8.41	2.73
6037800325	5.52	3.90	1-5% (lowest scores)	Los Angeles	3573	9.04	62.33	28.63	6.69	83.54	1.48	0	4.42	3.86
6037800326	3.55	1.07	1-5% (lowest scores)	Los Angeles	4741	8.69	64.4	26.91	9.79	77.75	4.35	0	7.11	1.01
6037800327	17.69	32.03	30-35%	Los Angeles	5827	9.47	78.98	11.55	14.95	68.7	3.67	0	8.32	4.36
6037800328	21.85	41.91	40-45%	Los Angeles	2733	8.01	83.64	8.34	13.06	66.89	1.94	0	15.11	3
6037800329	16.58	29.29	25-30%	Los Angeles	6953	13.85	70.3	15.85	9.41	77.06	2.5	0	6.9	4.13
6037800330	4.44	2.17	1-5% (lowest scores)	Los Angeles	882	13.72	67.35	18.93	4.42	91.95	0.91	0.79	0	1.93
6037800331	9.07	10.74	10-15%	Los Angeles	732	14.62	70.77	14.62	18.58	55.33	0.96	0.82	21.99	2.32
6037800332	9.42	11.47	10-15%	Los Angeles	6543	7.03	74.14	18.83	8.04	77.01	0.58	0	8.79	5.58
6037800406	7.03	6.85	5-10%	Los Angeles	2529	7.51	64.33	28.15	14.04	69.83	3.76	0.59	3.48	8.3
6037800408	4.36	2.09	1-5% (lowest scores)	Los Angeles	7274	4.52	73.4	22.08	11.49	82.72	0.29	0	1.07	4.43
6037800410	16.76	29.84	25-30%	Los Angeles	4031	4.74	87.55	7.72	15.08	59.81	4.39	0.57	14.88	5.26
6037800504	11.38	16.33	15-20%	Los Angeles	2334	3.94	65.51	30.55	4.03	85.86	2.57	0	5.7	1.84
6037800506	5.21	3.38	1-5% (lowest scores)	Los Angeles	3270	6.24	65.99	27.77	5.54	81.65	1.44	0	7.43	3.94
6037900102	39.47	74.09	70-75%	Los Angeles	710	10.7	62.82	26.48	44.51	45.77	0.7	0.42	1.69	6.9
6037900103	18.54	34.05	30-35%	Los Angeles	5939	14.33	72.87	12.8	51.17	36.67	10.34	0	0.42	1.4
6037900104	30.07	58.77	55-60%	Los Angeles	5822	16.61	73.74	9.65	61.75	29.18	7.16	0	0.67	1.24
6037900201	47.20	84.66	80-85%	Los Angeles	1129	7.44	68.47	24.09	41.72	48.01	2.04	1.95	4.69	1.59
6037900300	51.35	89.27	85-90%	Los Angeles	5613	18.23	75.82	5.95	45.41	29.98	11.37	2.21	8.87	2.16
6037900501	46.92	84.32	80-85%	Los Angeles	7225	17.11	73.74	9.15	47.93	19.88	24.43	0	4.42	3.35
6037900504	32.39	63.16	60-65%	Los Angeles	7261	17.49	74.12	8.39	51.38	21.73	19.64	0	5.81	1.43
6037900505	32.94	63.91	60-65%	Los Angeles	3427	15.79	70.56	13.66	42.78	28.42	23.78	0	2.31	2.71
6037900506	27.18	53.39	50-55%	Los Angeles	4188	16.6	74.79	8.62	44.7	16.26	34.98	0.67	0.29	3.1
6037900507	26.56	52.13	50-55%	Los Angeles	7333	14.62	76.57	8.81	45.74	29.16	16.56	0	7.24	1.31
6037900508	21.35	40.72	40-45%	Los Angeles	4016	16.26	76.32	7.42	47.58	25.32	21.09	0.12	1.54	4.33
6037900602	50.94	88.82	85-90%	Los Angeles	5542	17.72	75.78	6.5	68.13	17	11.01	0.04	1.21	2.62
6037900605	32.12	62.63	60-65%	Los Angeles	7539	24.14	66.87	8.99	61.25	21.05	16.42	0	0.45	0.82
6037900606	43.51	80.14	80-85%	Los Angeles	3532	18.94	72.82	8.24	32.36	21.86	42.38	1.3	1.61	0.48
6037900607	45.34	82.32	80-85%	Los Angeles	3651	16.84	74.01	9.15	47.25	33.11	14.49	0.38	3.51	1.26
6037900608	29.84	58.38	55-60%	Los Angeles	3445	13.85	75.76	10.39	49.87	18.72	24.91	0	4.5	2
6037900609	28.22	55.36	55-60%	Los Angeles	4978	18.82	75.63	5.54	48.13	13.06	30.17	0.24	1.87	6.53
6037900701	50.67	88.57	85-90%	Los Angeles	5012	14.41	75.48	10.12	36.27	29.39	29.09	0.5	2.73	2.02
6037900703	40.90	76.48	75-80%	Los Angeles	4349	11.2	75.24	13.57	37.46	24.24	30.63	0	4.37	3.31
6037900704	34.12	66.09	65-70%	Los Angeles	2910	19.31	74.85	5.84	18.21	23.81	43.95	0.27	11.72	2.03
6037900705	31.78	62.03	60-65%	Los Angeles	3980	16.96	65.5	17.54	30.15	44.77	16.16	2.66	1.91	4.35
6037900803	34.49	66.64	65-70%	Los Angeles	8751	16.89	73.31	9.8	45.49	32.59	15.67	0	3.5	2.75
6037900804	48.63	86.30	85-90%	Los Angeles	3359	17.36	74.34	8.31	57.16	15.75	23.19	0	2.86	1.04
6037900805	35.77	68.81	65-70%	Los Angeles	4916	11.07	70.3	18.63	47.88	35.01	12.88	0.22	1.55	2.46
6037900806	48.28	85.85	85-90%	Los Angeles	4634	19.62	62.8	17.59	32.37	20.8	39.23	0	5.11	2.48
6037900900	23.79	46.18	45-50%	Los Angeles	4018	15.18	67.94	16.87	20.93	64.16	9.76	0.37	1.79	2.99

6037901003	NA	NA	NA	Los Angeles	4895	0	97.83	2.17	40.74	11.81	29.58	0.84	2.3	14.73
6037901004	17.47	31.40	30-35%	Los Angeles	12463	14.64	74.67	10.69	37.32	39.58	12.84	0	8.57	1.69
6037901007	15.48	26.59	25-30%	Los Angeles	2094	20.68	67.57	11.75	29.85	54.63	2.63	1.24	4.44	7.21
6037901008	25.53	49.94	45-50%	Los Angeles	2744	11.37	78.61	10.02	36.73	36.7	13.3	0	9.26	4.01
6037901009	27.62	54.12	50-55%	Los Angeles	5388	11.14	75.33	13.53	27.02	45.51	19.58	0.26	5.12	2.51
6037901010	23.66	45.74	45-50%	Los Angeles	5723	18.59	69.05	12.35	33.97	45.75	16.37	0.45	2.13	1.33
6037901011	20.30	38.21	35-40%	Los Angeles	5314	12.82	75.27	11.91	24.46	49.7	10.99	2.52	7.3	5.02
6037901101	20.34	38.35	35-40%	Los Angeles	5519	12.27	76.3	11.43	29.23	48.61	10.93	0.24	6.56	4.44
6037901102	21.01	40.02	40-45%	Los Angeles	5337	12.31	74.57	13.12	29.6	53.21	7.66	3.39	3.92	2.21
6037901205	13.49	21.67	20-25%	Los Angeles	10783	11.86	75.9	12.24	25.98	46.58	19.84	0	5.27	2.34
6037901209	20.33	38.31	35-40%	Los Angeles	1634	10.77	66.28	22.95	33.05	56.43	3.37	0.67	2.75	3.73
6037901210	11.26	16.07	15-20%	Los Angeles	1631	10.3	72.41	17.29	33.17	54.45	0.55	1.9	3.74	6.19
6037901213	10.76	14.83	10-15%	Los Angeles	3853	12.02	69.87	18.12	11.71	72.64	7.53	2.02	4.88	1.22
6037910001	31.15	60.96	60-65%	Los Angeles	6345	15.49	72.91	11.6	67.42	17.6	9.93	0.52	2.74	1.78
6037910002	43.18	79.75	75-80%	Los Angeles	7723	13.12	72.93	13.96	64.68	29.95	1.58	2.05	0	1.75
6037910101	50.31	88.24	85-90%	Los Angeles	1863	22.71	70.1	7.19	72.73	7.09	16.26	0	1.88	2.04
6037910201	34.31	66.39	65-70%	Los Angeles	4063	12.63	72.43	14.94	53.9	31.5	6.25	0	3.77	4.58
6037910202	20.86	39.71	35-40%	Los Angeles	5823	11.63	73.69	14.68	29.02	52.21	4.59	0.27	10.56	3.35
6037910205	30.12	58.96	55-60%	Los Angeles	1225	14.37	71.18	14.45	51.84	31.18	1.88	0.73	9.15	5.22
6037910206	21.64	41.35	40-45%	Los Angeles	3776	17.98	73.7	8.32	45.18	28.58	14.88	0.61	7.76	2.99
6037910207	18.48	33.90	30-35%	Los Angeles	6033	13.49	75.98	10.53	41.6	28.94	15.08	0.15	11.7	2.52
6037910208	30.67	60.04	60-65%	Los Angeles	6210	14.59	74.91	10.5	55.65	21.9	8.94	0	9.03	4.48
6037910209	12.88	20.17	20-25%	Los Angeles	5134	20.24	70.59	9.17	30.35	40.63	15.72	0	12.08	1.23
6037910210	15.37	26.39	25-30%	Los Angeles	7239	12.43	79.62	7.94	33.5	43.69	12.71	0	8.88	1.22
6037910301	12.71	19.67	15-20%	Los Angeles	3874	9.27	71.61	19.13	30.77	58.57	5.89	0.36	1.24	3.18
6037910302	12.75	19.81	15-20%	Los Angeles	5517	14.23	71.58	14.19	41.73	43.23	6.14	0	4.8	4.1
6037910401	33.16	64.36	60-65%	Los Angeles	6359	15.8	71.17	13.02	43.47	34.35	5.54	0.96	10.72	4.97
6037910402	43.10	79.65	75-80%	Los Angeles	3583	18.06	73.35	8.6	69.33	9.49	12.06	5.02	1.09	3.01
6037910403	42.26	78.39	75-80%	Los Angeles	2278	27.96	70.28	1.76	86.35	4.04	5.75	0	1.58	2.28
6037910404	37.22	70.83	70-75%	Los Angeles	4284	16.25	72.5	11.25	69.93	13.07	10.08	0	4.69	2.22
6037910501	41.65	77.57	75-80%	Los Angeles	5218	26.47	64.2	9.33	59.66	9.18	28.65	0	1.84	0.67
6037910502	40.29	75.47	75-80%	Los Angeles	4537	18.98	71.72	9.3	74.08	6.33	14.24	0	3.84	1.52
6037910504	31.86	62.10	60-65%	Los Angeles	4254	15.04	76.75	8.2	74.33	14.57	8.06	0	2.94	0.09
6037910505	27.28	53.54	50-55%	Los Angeles	3217	15.95	76	8.05	74.35	14.14	2.42	5.41	1.8	1.87
6037910601	34.93	67.42	65-70%	Los Angeles	6726	15.83	77.1	7.06	69.79	12	16.16	0	1.25	0.8
6037910602	29.79	58.30	55-60%	Los Angeles	4433	15.66	75.84	8.5	62.06	16.58	15.38	1.76	3.94	0.27
6037910603	27.80	54.50	50-55%	Los Angeles	6928	13.77	75.35	10.88	69.04	16.54	11.95	0	1.57	0.89
6037910605	22.53	43.32	40-45%	Los Angeles	4715	18.6	73.74	7.66	69.8	13.66	9.08	0	4.6	2.86
6037910606	26.92	52.87	50-55%	Los Angeles	3121	16.24	75.42	8.33	72.93	10.54	8.72	0	6.21	1.6
6037910705	18.60	34.19	30-35%	Los Angeles	11613	11.43	79.99	8.59	70.21	12.35	13.59	0	3.39	0.46
6037910706	32.60	63.43	60-65%	Los Angeles	6301	15.24	79.88	4.89	70.21	10.33	14.19	0	4.56	0.71
6037910707	31.14	60.94	60-65%	Los Angeles	5420	20.5	70.15	9.35	61.05	15.68	16.85	3.54	1.97	0.9
6037910709	20.30	38.20	35-40%	Los Angeles	2039	15.99	72.54	11.48	61.21	32.07	4.61	0	1.28	0.83
6037910711	30.84	60.39	60-65%	Los Angeles	7655	14.55	74.59	10.86	66.99	17.35	9.76	0	5.88	0.03
6037910712	33.48	64.91	60-65%	Los Angeles	2904	13.71	73.42	12.88	67.77	13.05	15.36	0	1.93	1.89
6037910713	26.25	51.45	50-55%	Los Angeles	5787	14.19	77.03	8.78	74.56	9.92	11.46	0.21	2.99	0.86
6037910714	30.84	60.38	60-65%	Los Angeles	3870	17.86	75.89	6.25	77.39	6.54	13.75	0	1.4	0.93
6037910715	29.24	57.32	55-60%	Los Angeles	6653	11.59	82.22	6.19	65.04	12.05	18.89	0.38	3.04	0.6
6037910716	26.32	51.49	50-55%	Los Angeles	5770	17.56	72.34	10.1	64.07	20.78	10.73	0	2.96	1.46
6037910804	10.63	14.49	10-15%	Los Angeles	2964	7.29	76.99	15.72	29.32	67.27	1.11	0	1.92	0.37
6037910805	14.25	23.71	20-25%	Los Angeles	4722	9.83	74.84	15.33	18	74.16	1.02	0.42	3.79	2.6
6037910807	16.98	30.46	30-35%	Los Angeles	6424	13.45	76.04	10.51	35.55	49.22	4.7	0	8	2.52
6037910808	8.67	9.86	5-10%	Los Angeles	3445	12.51	75.59	11.9	25.43	64.03	5.46	0	0.55	4.53
6037910809	10.56	14.28	10-15%	Los Angeles	2070	12.95	67.63	19.42	12.75	79.23	0.68	0	4.15	3.19
6037910810	12.33	18.80	15-20%	Los Angeles	2599	13.58	77.34	9.08	18.24	55.06	6.73	3.96	10.43	5.58
6037910811	NA	NA	NA	Los Angeles	179	2.79	82.12	15.08	15.64	72.07	8.94	0	0	3.35
6037910812	NA	NA	NA	Los Angeles	363	7.16	73	19.83	20.66	77.41	0	0.83	1.1	0
6037910813	10.24	13.58	10-15%	Los Angeles	4080	9.61	72.16	18.24	20.93	74.31	0.12	0	2.72	1.91

6037911001	25.70	50.32	50-55%	Los Angeles	3926	7.9	65.87	26.24	42.82	48.73	4.46	0	1.3	2.7
6037920011	NA	NA	NA	Los Angeles	172	2.91	77.33	19.77	31.4	44.77	9.3	0	0	14.53
6037920012	7.93	8.36	5-10%	Los Angeles	1111	11.07	70.93	18	19.26	73.63	0	0	0.81	6.3
6037920013	19.16	35.55	35-40%	Los Angeles	7174	15.03	69.74	15.24	33.01	42.38	4.15	0.26	16.72	3.47
6037920015	7.56	7.82	5-10%	Los Angeles	6578	13.42	78.82	7.75	23.11	64.34	2.74	0	7.27	2.55
6037920016	3.88	1.36	1-5% (lowest scores)	Los Angeles	3563	9.68	79.03	11.28	21.19	57.28	4.72	0.17	13.89	2.75
6037920017	18.20	33.23	30-35%	Los Angeles	4309	12.09	75.35	12.56	33.84	55.33	0.16	0.14	4.97	5.57
6037920018	10.65	14.51	10-15%	Los Angeles	2024	11.17	77.32	11.51	21.99	67.93	3.01	0	5.43	1.63
6037920020	10.15	13.28	10-15%	Los Angeles	6501	10.2	75.77	14.03	31.41	56.3	1.2	0.34	7.31	3.45
6037920023	32.14	62.66	60-65%	Los Angeles	2615	9.25	80	10.75	47.84	42.33	4.97	0.27	0	4.59
6037920026	14.91	25.32	25-30%	Los Angeles	386	2.33	77.46	20.21	20.73	60.62	0	3.37	8.29	6.99
6037920028	12.53	19.25	15-20%	Los Angeles	7091	21.28	71.13	7.59	32.38	42.03	4.68	0.68	16.1	4.13
6037920029	22.29	42.73	40-45%	Los Angeles	5632	12.8	78.02	9.18	42.44	40.34	5.01	0	9.24	2.98
6037920030	27.99	54.93	50-55%	Los Angeles	5088	12.97	75.28	11.75	40.74	38.03	6.15	0	11.62	3.46
6037920031	18.81	34.76	30-35%	Los Angeles	4343	9.37	57.2	33.43	31.87	50.96	5.04	0.44	7.55	4.14
6037920032	3.99	1.51	1-5% (lowest scores)	Los Angeles	3558	12.93	78.44	8.63	24.54	57.76	3.23	0	10.57	3.91
6037920033	17.02	30.52	30-35%	Los Angeles	598	6.02	77.26	16.72	38.13	50.67	6.19	0	1.34	3.68
6037920034	22.86	44.07	40-45%	Los Angeles	3790	13.32	76.83	9.84	44.46	37.6	0.98	0.45	11.16	5.36
6037920035	30.88	60.41	60-65%	Los Angeles	6895	11.34	78.3	10.36	51.4	33.18	1.38	0	11.09	2.94
6037920036	33.31	64.60	60-65%	Los Angeles	3145	11.86	74.37	13.77	62.35	27.25	1.43	0.29	5.51	3.18
6037920037	25.82	50.67	50-55%	Los Angeles	10318	19.66	74.46	5.87	68.67	17.47	5.05	0.33	5.34	3.14
6037920038	29.38	57.59	55-60%	Los Angeles	1710	13.27	76.37	10.35	54.97	32.34	5.38	0.64	0	6.67
6037920039	16.80	29.94	25-30%	Los Angeles	2191	8.85	77.18	13.97	36.33	42.72	11.23	0	2.65	7.07
6037920040	16.02	27.91	25-30%	Los Angeles	3979	13.97	76.6	9.42	31.94	46.92	5.05	0	12.11	3.97
6037920041	24.53	47.83	45-50%	Los Angeles	1668	20.5	75.42	4.08	62.89	25	2.52	0	7.49	2.1
6037920042	22.42	43.10	40-45%	Los Angeles	6990	13.63	75.61	10.76	32.19	43.12	4.66	0.26	13.46	6.31
6037920043	18.17	33.08	30-35%	Los Angeles	7130	19.14	71.29	9.57	25.65	38.72	4.63	0	26.19	4.81
6037920044	12.06	18.12	15-20%	Los Angeles	2399	14.55	74.7	10.75	33.43	49.6	1	0	11.55	4.42
6037920045	6.75	6.29	5-10%	Los Angeles	4282	10.49	79.52	10	19.76	63.4	2.38	0	13.07	1.38
6037920102	17.99	32.75	30-35%	Los Angeles	5466	13.87	75.83	10.3	36.52	49.25	2.36	0	4.98	6.9
6037920104	15.34	26.29	25-30%	Los Angeles	2933	10.36	77.53	12.1	25.61	63.08	1.06	0	3.82	6.44
6037920106	24.32	47.43	45-50%	Los Angeles	3381	12.39	77.64	9.97	61.96	32.39	1.92	0	2.81	0.92
6037920107	12.15	18.32	15-20%	Los Angeles	6295	19.83	73.8	6.37	17.57	49.56	3.91	0.94	25.37	2.65
6037920108	12.13	18.29	15-20%	Los Angeles	5386	20.33	75.47	4.2	15.5	40.74	3.06	1.08	29.65	9.97
6037920109	9.28	11.13	10-15%	Los Angeles	5696	14.61	71.7	13.69	19.1	57.53	7.15	0	12.55	3.67
6037920110	6.26	5.23	5-10%	Los Angeles	3088	8.06	85.88	6.06	17.36	62.73	3.63	0	14.7	1.59
6037920111	7.09	6.91	5-10%	Los Angeles	2738	14.43	70.05	15.52	24.43	62.75	4.49	1.24	5.48	1.61
6037920112	17.12	30.60	30-35%	Los Angeles	4211	12.85	67.2	19.95	18.05	62.88	3.99	0	11.26	3.82
6037920114	15.88	27.55	25-30%	Los Angeles	6518	16.86	78.03	5.11	19.45	57.73	2.55	0	16.85	3.42
6037920115	20.02	37.58	35-40%	Los Angeles	3957	16.38	70.36	13.27	15.82	56.61	2.32	1.11	19.56	4.57
6037920116	15.05	25.64	25-30%	Los Angeles	5481	15.64	72.49	11.88	22	54.26	7.95	0	12.65	3.14
6037920118	14.00	23.06	20-25%	Los Angeles	6035	12.34	78.66	9	26.11	54.27	3.51	0.45	13.67	1.99
6037920119	14.15	23.40	20-25%	Los Angeles	1974	13.48	82.32	4.2	25.73	57.55	2.53	0	10.99	3.19
6037920200	NA	NA	NA	Los Angeles	5393	0	99.72	0.28	59.45	13.41	17.86	0	1.57	7.71
6037920303	18.76	34.66	30-35%	Los Angeles	1608	11.26	80.97	7.77	26.74	42.79	0.5	0	15.17	14.8
6037920312	30.81	60.33	60-65%	Los Angeles	5826	14.32	67.54	18.14	31.58	53.69	5.18	0.34	6.46	2.75
6037920313	24.89	48.51	45-50%	Los Angeles	4821	13.57	71.38	15.06	36.07	53.31	0.89	0.41	8.11	1.2
6037920314	15.67	27.03	25-30%	Los Angeles	2920	10.1	77.77	12.12	27.98	61.23	1.68	0	6.16	2.95
6037920322	20.77	39.45	35-40%	Los Angeles	2854	12.61	68.01	19.38	20.64	66.43	5.5	0	2.8	4.63
6037920326	20.74	39.40	35-40%	Los Angeles	6324	12.62	74.07	13.31	18.45	48.18	5.6	0	25.6	2.17
6037920328	23.81	46.23	45-50%	Los Angeles	2036	8.55	82.51	8.94	11.94	59.14	2.06	0.64	19.5	6.73
6037920329	13.89	22.73	20-25%	Los Angeles	7152	10.36	74.9	14.74	18.11	66.08	3.33	0	7.9	4.59
6037920330	17.24	30.87	30-35%	Los Angeles	3225	8.09	57.83	34.08	23.04	57.92	1.98	0	14.51	2.54
6037920331	8.74	10.09	10-15%	Los Angeles	3482	13.18	72.57	14.24	28.09	57.64	2.87	0	4.85	6.55
6037920332	23.94	46.63	45-50%	Los Angeles	2438	5.37	84.09	10.54	25.1	64.93	0.49	0.53	4.68	4.27
6037920334	16.04	27.94	25-30%	Los Angeles	6217	10.54	70.9	18.56	22.79	62.33	2.49	0.37	8.24	3.78
6037920336	37.79	71.75	70-75%	Los Angeles	6881	18.82	76.56	4.62	76.56	15.26	0.38	0	3.55	4.26
6037920337	35.38	68.13	65-70%	Los Angeles	6943	12.26	82.34	5.4	68.01	14.07	6.03	0.32	10.05	1.51

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6041102202	6.75	6.27	5-10%	Marin	6142	6.94	72.18	20.89	13.73	73.05	4.28	0	4.3	4.64
6041102203	18.85	34.86	30-35%	Marin	5761	14.37	71.64	13.99	32.95	49.28	4.69	0	6.87	6.21
6041103100	4.22	1.93	1-5% (lowest scores)	Marin	7887	7.66	71.64	20.7	6.66	82.44	1.45	0	3.95	5.52
6041103200	8.88	10.43	10-15%	Marin	7290	6.47	68.59	24.94	18.02	62.67	3.77	0.43	9.78	5.32
6041104101	10.53	14.21	10-15%	Marin	8039	9.18	68.54	22.28	17.78	66.02	2.69	0.35	8.18	4.99
6041104102	16.20	28.42	25-30%	Marin	5760	13.32	70.85	15.83	33.14	47.45	1.23	0.64	10.21	7.33
6041104200	13.77	22.40	20-25%	Marin	5894	9.59	66.78	23.63	16.14	68.53	1.97	0	6.68	6.68
6041104300	16.31	28.61	25-30%	Marin	1653	10.65	63.94	25.41	4.17	82.7	2.54	0.85	6.17	3.57
6041105000	19.47	36.07	35-40%	Marin	7077	12.76	71.46	15.78	17.61	51.69	8.29	0	10.96	11.45
6041106001	20.31	38.26	35-40%	Marin	4582	9.78	65.76	24.47	16.8	62.68	2.6	0.07	12.88	4.98
6041106002	11.60	16.82	15-20%	Marin	5598	9.02	65.63	25.35	6.57	71.47	4.11	0	8.72	9.13
6041107000	3.95	1.42	1-5% (lowest scores)	Marin	6803	10.94	66.29	22.77	13.02	74.06	0.1	0	5.88	6.94
6041108100	5.78	4.24	1-5% (lowest scores)	Marin	6543	10.12	67.31	22.57	7.81	83.02	0.55	0.2	4.66	3.76
6041108200	12.43	19.05	15-20%	Marin	6901	6.85	69.24	23.91	24.82	51.8	1.16	0.81	13.14	8.26
6041109001	11.95	17.80	15-20%	Marin	4280	9.32	74.67	16	26.64	62.27	1.24	0	4.65	5.21
6041109002	4.83	2.77	1-5% (lowest scores)	Marin	3851	10.8	65	24.2	4.65	85.12	1.77	0	5.89	2.57
6041110100	21.46	41.06	40-45%	Marin	5903	8.08	65.44	26.48	16.25	73.18	1.58	0	7.61	1.39
6041110200	4.78	2.70	1-5% (lowest scores)	Marin	5016	11.84	56.96	31.2	2.05	86.92	0.36	0	6.32	4.35
6041111000	12.45	19.10	15-20%	Marin	5204	6.21	74.48	19.31	21.83	70.02	3.5	0	3.34	1.31
6041112100	27.78	54.48	50-55%	Marin	4512	13.36	71.5	15.14	32.51	60.48	0.64	0	2.9	3.46
6041112201	31.01	60.65	60-65%	Marin	8175	23.65	73.58	2.78	89.04	5.66	0.67	0.07	2.53	2.02
6041112202	37.24	70.85	70-75%	Marin	4771	20.39	69.69	9.91	66.69	20.73	0.5	0	9.52	2.56
6041113000	2.89	0.62	1-5% (lowest scores)	Marin	3371	13.32	55.21	31.47	11.04	85.76	0.09	0.65	0.77	1.69
6041114100	5.65	4.02	1-5% (lowest scores)	Marin	5206	6.26	72.53	21.21	7.65	82.1	0.04	0	6.07	4.15
6041114200	4.32	2.05	1-5% (lowest scores)	Marin	3242	12.34	61.75	25.91	11.81	81.31	0.99	0	2.56	3.33
6041115000	2.80	0.59	1-5% (lowest scores)	Marin	7528	10.16	70.75	19.09	9.4	86.16	0	0	2.38	2.06
6041116000	3.98	1.49	1-5% (lowest scores)	Marin	3154	10.43	71.75	17.82	3.58	85.32	1.05	0	3.96	6.09
6041117000	4.76	2.65	1-5% (lowest scores)	Marin	4212	9.43	69.54	21.04	7.08	86.49	1.5	0	4.11	0.83
6041118100	6.02	4.69	1-5% (lowest scores)	Marin	2290	11.88	61.22	26.9	3.49	89.13	3.01	0	3.84	0.52
6041119100	2.18	0.33	1-5% (lowest scores)	Marin	4983	9.71	68.23	22.05	4.27	90.03	0	0	2.79	2.91
6041119201	9.95	12.80	10-15%	Marin	3601	7.22	60.21	32.57	18.08	66.15	1.36	0	11.08	3.33
6041119202	9.63	12.05	10-15%	Marin	3546	11.59	69.71	18.7	9.45	78.2	0.45	0	6.62	5.27
6041120000	5.13	3.24	1-5% (lowest scores)	Marin	5857	9.25	66.91	23.83	2.94	87.66	0.41	0.75	2.9	5.34
6041121100	10.84	15.08	15-20%	Marin	5453	10.62	70.14	19.24	11.31	74.86	2.27	0	6.03	5.52
6041121200	10.72	14.73	10-15%	Marin	6414	11.07	68.9	20.03	9.85	76.07	1.86	0.34	6.67	5.21
6041122000	NA	NA	NA	Marin	2649	0	96.04	3.96	36.2	18.72	29.26	2.15	4.75	8.91
6041123000	8.97	10.58	10-15%	Marin	2124	7.86	62.76	29.38	5.08	92.28	0	0	2.02	0.61
6041124100	2.76	0.55	1-5% (lowest scores)	Marin	5889	8.17	71.49	20.34	7.54	80.12	0	0	6.35	5.99
6041124200	6.96	6.69	5-10%	Marin	5716	8.26	60.39	31.35	6.88	81.09	2.22	0.26	2.52	7.03
6041125000	7.11	6.96	5-10%	Marin	4177	9.67	69.43	20.9	7.59	74.31	1.56	0	12.57	3.97
6041126100	1.03	0.01	1-5% (lowest scores)	Marin	6195	13.56	67.52	18.92	3.28	88.81	0.24	0	4.7	2.97
6041126200	7.79	8.17	5-10%	Marin	4224	6.79	64.75	28.46	7.29	82.65	0.07	0	5.82	4.17
6041127000	1.81	0.16	1-5% (lowest scores)	Marin	4583	9.14	67.51	23.35	3.32	86.3	1.92	0	4.15	4.32
6041128100	3.24	0.83	1-5% (lowest scores)	Marin	6911	9.41	69.4	21.2	5.3	83.32	0	0	5.86	5.53
6041128200	4.97	2.99	1-5% (lowest scores)	Marin	4957	11.08	72.14	16.78	5.79	82.07	3.09	0	5.71	3.35
6041129000	18.75	34.63	30-35%	Marin	2939	16.4	75.06	8.54	26.34	28.79	23.1	0	7.15	14.63
6041130201	7.61	7.89	5-10%	Marin	3232	6.65	63.61	29.73	9.44	86.23	0.59	0.46	2.91	0.37
6041130202	10.90	15.23	15-20%	Marin	4377	5.8	61.16	33.04	6.58	88.07	0.96	0	3.04	1.35
6041131100	11.54	16.69	15-20%	Marin	1234	9.48	71.56	18.96	4.13	85.82	3.73	0.08	0.32	5.92
6041132100	4.73	2.60	1-5% (lowest scores)	Marin	1825	4.99	49.26	45.75	4.93	87.45	0	0	1.21	6.41
6041132200	5.05	3.10	1-5% (lowest scores)	Marin	1641	4.81	56.79	38.39	8.65	89.58	1.04	0	0	0.73
6041133000	11.05	15.61	15-20%	Marin	2658	10.2	58.43	31.38	12.49	81.23	0	2.78	1.81	1.69
6043000101	28.76	56.48	55-60%	Mariposa	3883	10.64	64.41	24.95	10.69	76.85	5.05	1.62	2.81	2.99
6043000102	22.87	44.11	40-45%	Mariposa	2576	12.31	61.3	26.4	6.75	90.33	0	2.02	0.43	0.47
6043000200	15.77	27.31	25-30%	Mariposa	2857	4.62	55.93	39.45	18.55	73.78	0.56	1.09	1.79	4.24
6043000301	10.92	15.29	15-20%	Mariposa	3771	9.55	61.89	28.56	8.64	83.35	0	0.4	0.82	6.79
6043000302	13.97	22.91	20-25%	Mariposa	2631	9.58	64.04	26.38	5.59	82.78	0	6.23	0.46	4.94
6043000400	11.14	15.75	15-20%	Mariposa	1702	4.58	81.14	14.28	21.8	70.21	2.41	0	2.88	2.7

6045010100	14.83	25.11	25-30%	Mendocino	2674	16.38	61.18	22.44	20.46	41.92	0.67	25.95	0.34	10.66
6045010200	14.62	24.61	20-25%	Mendocino	3542	10.08	64.82	25.1	12.34	70.86	0.93	11.24	0.68	3.95
6045010300	16.64	29.46	25-30%	Mendocino	4115	13.37	59.03	27.61	14.14	78.86	0.78	0.92	2.13	3.16
6045010400	25.02	48.79	45-50%	Mendocino	3276	10.16	64.9	24.94	18.8	72.95	1.01	1.47	1.83	3.94
6045010500	24.04	46.82	45-50%	Mendocino	4687	19.63	62.51	17.86	40.77	53.98	0.85	0.75	0.73	2.92
6045010600	25.79	50.57	50-55%	Mendocino	6346	14.25	60.18	25.58	13.44	80.82	0	0.17	2.07	3.5
6045010700	27.85	54.63	50-55%	Mendocino	6344	11.43	68.77	19.8	17.01	72.6	1.06	3.77	0.2	5.36
6045010801	12.05	18.10	15-20%	Mendocino	5322	8.72	76.16	15.13	21.97	69.67	0.11	5.98	0.41	1.86
6045010802	16.53	29.19	25-30%	Mendocino	1869	16.21	58.91	24.88	14.98	78.92	0	1.98	1.23	2.89
6045010900	22.33	42.84	40-45%	Mendocino	4989	12.39	70.62	17	37.14	59.33	0.1	0.34	1.46	1.62
6045011001	9.38	11.37	10-15%	Mendocino	2210	3.94	63.71	32.35	5.7	85.38	0	0	6.11	2.81
6045011002	15.38	26.41	25-30%	Mendocino	6135	7.37	62.18	30.45	13.56	79.02	0	0.93	3.55	2.93
6045011102	12.39	18.96	15-20%	Mendocino	4188	8.67	58.5	32.83	19.94	71.82	0.74	5.71	0.52	1.27
6045011200	11.83	17.44	15-20%	Mendocino	3023	10.35	68.11	21.53	39.3	56	2.08	0	1.19	1.42
6045011300	30.15	59.01	55-60%	Mendocino	5673	13.06	73.14	13.8	35.8	56.43	0.46	4.74	0.83	1.75
6045011400	11.92	17.70	15-20%	Mendocino	4556	10.51	67.93	21.55	15.43	73.68	1.08	0.53	2.9	6.39
6045011500	33.07	64.13	60-65%	Mendocino	6639	16.42	73.41	10.17	42.21	48.53	0.62	2.08	4	2.56
6045011600	37.48	71.37	70-75%	Mendocino	5488	13.17	70.66	16.16	53.55	37.57	1.69	1.9	3.19	2.1
6045011700	24.36	47.53	45-50%	Mendocino	4097	10.59	65.66	23.75	12.96	65.17	1.95	2.73	9.33	7.86
6045011800	10.43	13.93	10-15%	Mendocino	2051	15.31	67.77	16.92	28.47	60.21	0.44	7.8	2.34	0.73
6047000201	55.14	92.62	90-95%	Merced	3918	16.39	70.93	12.69	53.7	38.41	0.26	4.06	2.96	0.61
6047000202	36.82	70.32	70-75%	Merced	1889	13.87	73.85	12.28	64.58	32.61	0.21	0	2.59	0
6047000203	44.00	80.80	80-85%	Merced	10533	13.62	79.98	6.4	79.02	14.74	0	0	4.81	1.42
6047000301	43.02	79.51	75-80%	Merced	5499	17.29	69.69	13.02	72.43	7.55	0	0	18.99	1.04
6047000303	35.05	67.65	65-70%	Merced	2540	13.27	72.56	14.17	45.83	49.49	1.34	0.28	2.8	0.28
6047000304	46.01	83.27	80-85%	Merced	10132	17.68	72.7	9.62	71.3	7.99	0.17	0	19.63	0.91
6047000401	41.37	77.22	75-80%	Merced	1526	12.06	71.49	16.45	46.07	49.8	2.03	1.77	0.33	0
6047000402	32.78	63.65	60-65%	Merced	9060	14.22	71.41	14.37	31.37	64.44	0	0.39	0.18	3.63
6047000503	38.03	72.20	70-75%	Merced	3231	9.19	81.46	9.35	41.97	37.23	15.23	0	3.5	2.07
6047000504	40.87	76.39	75-80%	Merced	6569	16.96	72.58	10.46	78.47	19.49	0.24	0	1.55	0.24
6047000505	45.39	82.41	80-85%	Merced	6663	17.77	68.99	13.24	65.3	23.55	0.62	0	8.94	1.59
6047000601	40.11	75.14	75-80%	Merced	4719	15.79	71.94	12.27	55.56	35.03	2.86	0.78	1.82	3.94
6047000602	40.52	75.90	75-80%	Merced	4192	16.84	72.59	10.57	61.86	34.04	1.26	0	2.24	0.6
6047000603	43.76	80.48	80-85%	Merced	5882	17.46	72.37	10.17	57.07	31.42	5.03	0.22	4.05	2.21
6047000701	55.08	92.59	90-95%	Merced	3226	17.64	72.6	9.76	60.48	25.67	8.34	0.81	1.39	3.32
6047000702	29.91	58.50	55-60%	Merced	5681	11.67	71.22	17.11	29.77	52.54	2.92	1.13	11.69	1.95
6047000801	48.32	85.93	85-90%	Merced	5539	15	69.65	15.35	52.7	33.91	4.71	0.29	5.87	2.53
6047000802	41.33	77.14	75-80%	Merced	4109	11.19	77.51	11.29	50.64	38.33	2.21	0.37	7.16	1.29
6047000901	45.53	82.61	80-85%	Merced	4028	13.38	78.82	7.8	61.27	33.04	1.99	0	0.99	2.71
6047000902	48.76	86.45	85-90%	Merced	9505	19	69.73	11.27	43.38	36.61	0.8	0.31	16.55	2.36
6047001002	43.70	80.37	80-85%	Merced	15901	13.81	77.54	8.65	43.84	29.58	5.05	0	19.19	2.35
6047001003	40.50	75.86	75-80%	Merced	4281	17.05	72.37	10.58	53.68	22.8	8.46	0.44	7.69	6.94
6047001004	35.42	68.26	65-70%	Merced	3650	11.07	69.29	19.64	49.26	27.51	8.9	0.08	9.75	4.49
6047001005	58.69	94.88	90-95%	Merced	2461	15.4	71.88	12.72	60.26	19.14	12.96	0.24	4.87	2.52
6047001101	28.45	55.82	55-60%	Merced	5681	12.44	70.53	17.02	37.85	43.65	4.08	0.65	10.6	3.17
6047001200	33.93	65.70	65-70%	Merced	5636	20.49	65.13	14.37	45.71	37.35	2.68	0.21	6.39	7.67
6047001301	66.41	98.21	95-100% (highest scores)	Merced	2662	12.21	73.85	13.94	56.87	35.88	3.76	0	2.63	0.86
6047001302	66.50	98.25	95-100% (highest scores)	Merced	2873	12.01	79.32	8.67	65.02	26.56	3.45	0.21	1.11	3.65
6047001401	54.88	92.45	90-95%	Merced	4194	19.17	70.31	10.52	59.25	32.24	2.36	0.21	3.36	2.58
6047001402	41.17	76.87	75-80%	Merced	4423	15.6	68.87	15.53	47.34	38.35	5.47	0	6.35	2.49
6047001501	41.35	77.19	75-80%	Merced	2425	10.85	82.27	6.89	63.84	17.24	0.99	0	17.03	0.91
6047001502	56.96	93.87	90-95%	Merced	2329	20.18	68.61	11.21	87.29	7.43	0.47	0	4.81	0
6047001503	43.02	79.50	75-80%	Merced	4585	16.9	73.68	9.42	74.39	6.89	6.32	0.55	10.95	0.89
6047001601	62.60	96.86	95-100% (highest scores)	Merced	4238	21.87	74.89	3.23	80.98	10.31	5.19	0.02	2.22	1.27
6047001602	54.40	92.03	90-95%	Merced	7877	19.23	74.71	6.06	64.21	9.98	5.42	0	19.02	1.37
6047001700	45.07	82.09	80-85%	Merced	6684	21.17	69.84	8.99	59.8	21.78	4.85	0	11.51	2.06
6047001801	19.84	37.07	35-40%	Merced	5719	8.48	84.89	6.63	41.84	37.93	2.2	0.4	14.76	2.87
6047001901	39.06	73.59	70-75%	Merced	5517	18.72	69.13	12.14	87.77	10.49	0	1	0.6	0.15

6047001902	42.24	78.38	75-80%	Merced	2345	13.77	73.73	12.49	72.24	23.97	1.54	0	1.45	0.81
6047002000	46.69	84.05	80-85%	Merced	8712	12.12	72.52	15.36	62.21	36.78	0.16	0.42	0.23	0.2
6047002100	47.79	85.24	85-90%	Merced	4246	17.97	73.72	8.31	68.13	24.49	0.47	1.98	3.27	1.65
6047002201	63.02	97.09	95-100% (highest scores)	Merced	6249	20.64	68.01	11.35	77.23	20.1	0.51	0	1.18	0.98
6047002202	51.06	88.92	85-90%	Merced	10170	16.18	75.5	8.32	79.51	14.48	2.65	0.44	0.76	2.16
6047002301	32.53	63.35	60-65%	Merced	6759	13.06	73.06	13.88	51.92	39.47	3.95	0	4.47	0.19
6047002302	51.44	89.38	85-90%	Merced	15950	21.64	70.41	7.96	72.2	16.66	2.26	0.75	5.68	2.45
6047002401	54.79	92.32	90-95%	Merced	1406	17.5	65.79	16.71	55.41	35.06	4.77	0.28	3.49	1
6047002402	43.28	79.89	75-80%	Merced	7637	17.01	71.51	11.48	74.06	17.85	3.19	0	0.41	4.49
6047002500	43.97	80.76	80-85%	Merced	2389	10.88	69.69	19.42	39.56	46.09	0.96	0.71	12.22	0.46
6047002600	35.32	67.99	65-70%	Merced	5942	18.66	70.53	10.8	38.86	43.23	4.26	0	12.79	0.86
6049000100	31.78	62.01	60-65%	Modoc	3509	14.79	65.03	20.18	13.51	79.99	2.94	2.28	0.31	0.97
6049000200	14.08	23.26	20-25%	Modoc	1650	10.12	67.82	22.06	25.7	69.09	0	3.15	0	2.06
6049000300	16.36	28.67	25-30%	Modoc	2441	4.47	57.48	38.06	11.39	78.33	1.15	5.45	3.4	0.29
6049000400	13.21	20.93	20-25%	Modoc	1307	13.7	55.7	30.6	8.8	81.18	0.38	8.19	1.07	0.38
6051000101	16.87	30.14	30-35%	Mono	3697	5.98	68.6	25.43	14.5	80.42	0.3	2.57	1.35	0.87
6051000102	8.60	9.81	5-10%	Mono	2444	8.67	62.93	28.4	10.88	75.86	0.98	5.11	0.53	6.63
6051000200	14.59	24.52	20-25%	Mono	8169	10.32	84.6	5.08	37.5	54.85	0.29	0.27	3.67	3.42
6053000101	17.70	32.05	30-35%	Monterey	2283	9.59	78.19	12.22	64.65	28.56	1.18	3.33	1.23	1.05
6053000102	23.86	46.37	45-50%	Monterey	9315	14.22	74.12	11.66	73.19	9.57	1.77	0.16	14.99	0.32
6053000103	28.78	56.53	55-60%	Monterey	4695	13.78	73.89	12.33	72.46	11.52	1.43	0	12.42	2.17
6053000104	20.26	38.14	35-40%	Monterey	3878	10.21	78.37	11.42	73.29	13.23	3.84	0.08	3.84	5.72
6053000200	23.09	44.76	40-45%	Monterey	7489	16.25	77.07	6.68	84.36	12	0.12	0	3.3	0.21
6053000300	29.87	58.42	55-60%	Monterey	4794	11.01	77.99	10.99	72.57	17.63	1.17	0	5.01	3.63
6053000400	34.04	65.89	65-70%	Monterey	7745	16.54	74.41	9.05	78.85	14.73	2.74	0.27	2.57	0.84
6053000501	33.26	64.47	60-65%	Monterey	4416	22.96	68.73	8.31	97.69	1.72	0.59	0	0	0
6053000502	34.67	67.03	65-70%	Monterey	4182	20.33	67.53	12.15	86.66	9.3	0.72	0.17	1.89	1.27
6053000600	33.99	65.77	65-70%	Monterey	7302	19.23	76.02	4.75	97.52	2.11	0	0	0	0.37
6053000701	23.11	44.79	40-45%	Monterey	5869	21.21	75.07	3.71	98.02	1.98	0	0	0	0
6053000702	18.88	34.91	30-35%	Monterey	5883	24.09	71.55	4.37	98.67	1.02	0.15	0	0.15	0
6053000800	31.73	61.88	60-65%	Monterey	5802	19.87	75.09	5.03	98.9	0.91	0.16	0.03	0	0
6053000900	46.29	83.60	80-85%	Monterey	5657	19.04	74.3	6.66	94.5	2.95	1.59	0.25	0.14	0.57
6053001200	28.37	55.64	55-60%	Monterey	3003	13.19	67.6	19.21	39.36	53.91	0.47	0.2	1.96	4.1
6053001300	37.91	71.96	70-75%	Monterey	2508	16.55	75.76	7.7	85.85	5.82	2.87	0.76	4.23	0.48
6053001400	26.33	51.54	50-55%	Monterey	2679	12.28	75.74	11.98	53.3	42.33	0.04	0	2.69	1.64
6053001500	19.43	36.01	35-40%	Monterey	6354	13.57	72.22	14.21	52.97	35.71	0.6	0.22	7.27	3.23
6053001600	13.63	22.04	20-25%	Monterey	2700	17.19	66.15	16.67	44.56	43.78	0.48	0	5.48	5.7
6053001700	37.55	71.41	70-75%	Monterey	3963	16.55	74.29	9.16	68.41	23.29	1.51	0	3.41	3.38
6053001801	34.51	66.73	65-70%	Monterey	4185	14.43	73.29	12.28	64.37	16.11	5.5	0	10.89	3.13
6053001802	33.59	65.14	65-70%	Monterey	5475	14.79	79.12	6.08	78.45	9.81	2.01	0	9.02	0.71
6053010101	43.86	80.64	80-85%	Monterey	5024	18.71	76.41	4.88	88.61	6.67	0.4	2.53	1.58	0.22
6053010102	13.05	20.66	20-25%	Monterey	3539	16.64	68.3	15.06	51.4	44.62	0.88	0	2.2	0.9
6053010202	14.29	23.78	20-25%	Monterey	4943	8.7	79.41	11.9	56.18	35.08	0.69	0	2.3	5.75
6053010305	9.61	11.96	10-15%	Monterey	4555	8.47	73.63	17.89	38.55	52.89	0.13	0.55	6.45	1.43
6053010306	24.53	47.81	45-50%	Monterey	1592	5.72	66.71	27.58	42.84	49.43	1.57	1.82	0.94	3.39
6053010400	31.75	61.95	60-65%	Monterey	6521	21.27	69.19	9.54	89.07	8.2	0.02	0	2.56	0.15
6053010501	23.44	45.47	45-50%	Monterey	6392	8.12	72.43	19.45	47.2	38.78	0.08	0	4.38	9.56
6053010504	37.52	71.39	70-75%	Monterey	5246	13.46	77.01	9.53	78.19	11.99	0.29	0	7.61	1.93
6053010505	19.98	37.49	35-40%	Monterey	6016	20.58	72.17	7.25	79.31	15.13	1.4	0.23	2.58	1.36
6053010506	31.48	61.46	60-65%	Monterey	5247	22.34	69.53	8.14	80.69	7.91	4.75	0	6.02	0.63
6053010603	13.88	22.69	20-25%	Monterey	7448	15.83	74.77	9.4	69.88	15.99	1.93	1.1	9.14	1.95
6053010604	16.73	29.70	25-30%	Monterey	5643	14.19	75.74	10.07	80.15	6.95	1.31	0.27	9.46	1.86
6053010605	19.20	35.63	35-40%	Monterey	4799	17.88	77.22	4.9	93.85	1.04	1.17	0	3.27	0.67
6053010606	23.81	46.27	45-50%	Monterey	6479	13.44	75.69	10.87	81.83	11.62	0.06	0	5.62	0.86
6053010607	19.49	36.21	35-40%	Monterey	4146	23.59	71.83	4.58	94.84	1.35	0.51	0	3.06	0.24
6053010608	31.68	61.78	60-65%	Monterey	3227	18.66	78.43	2.91	84.51	6.1	2.14	0.03	6.45	0.77
6053010701	4.47	2.23	1-5% (lowest scores)	Monterey	6464	12.07	68.05	19.88	18.61	70.65	0.02	0	7.91	2.82
6053010702	5.27	3.50	1-5% (lowest scores)	Monterey	3266	6.43	60.04	33.53	14.45	81.72	0	0	2.51	1.32

6053010804	33.96	65.75	**65-70%**	Monterey	5469	17.68	72.87	9.45	92.48	6.71	0.04	0.16	0.6	0
6053010900	NA	NA	**NA**	Monterey	8821	0	98.13	1.87	42.98	21.14	27.4	0.82	4.53	3.13
6053011000	4.47	2.24	**1-5% (lowest scores)**	Monterey	5844	8.28	60.99	30.73	15.37	81.02	0.79	0	0.7	2.12
6053011101	25.72	50.40	**50-55%**	Monterey	5924	20.49	70.16	9.35	88.57	9.77	0	0.24	0.27	1.15
6053011102	18.19	33.19	**30-35%**	Monterey	12388	16.53	75.52	7.94	85.9	10.7	0	0	1.01	2.39
6053011202	28.67	56.27	**55-60%**	Monterey	7263	20.54	71.68	7.78	85.63	10.05	1.79	0	0.41	2.12
6053011203	25.71	50.37	**50-55%**	Monterey	6986	23.1	70.2	6.7	94.43	3.39	0.31	0	1.49	0.37
6053011204	31.73	61.91	**60-65%**	Monterey	3749	24.49	71.7	3.81	93.62	5.63	0.61	0	0.13	0
6053011302	24.93	48.58	**45-50%**	Monterey	5933	21.83	72.93	5.24	87.12	9.84	0	0	0	3.03
6053011303	19.94	37.41	**35-40%**	Monterey	4175	15.07	70.59	14.35	56.31	40.74	0.02	0	0.24	2.68
6053011304	29.38	57.58	**55-60%**	Monterey	7595	18.18	75.5	6.32	89.68	5.33	1.88	0	3.04	0.07
6053011400	25.52	49.90	**45-50%**	Monterey	4462	9.75	75.32	14.93	28.53	60.15	3.79	0.16	3.47	3.9
6053011502	4.04	1.58	**1-5% (lowest scores)**	Monterey	1987	10.52	72.27	17.21	36.44	60.04	1.51	0	1.51	0.5
6053011602	5.29	3.54	**1-5% (lowest scores)**	Monterey	5991	4.49	51.11	44.4	5.59	81.17	0.05	0.58	7.39	5.21
6053011604	3.87	1.32	**1-5% (lowest scores)**	Monterey	2087	10.64	41.26	48.11	12.07	82.32	1.01	0	3.16	1.44
6053011700	11.01	15.49	**15-20%**	Monterey	3852	10.44	55.71	33.85	10.31	80.4	0.21	0	8.34	0.75
6053011801	2.80	0.58	**1-5% (lowest scores)**	Monterey	2125	4.47	53.08	42.45	3.81	84.8	0.05	0	6.16	5.18
6053011802	3.15	0.76	**1-5% (lowest scores)**	Monterey	1705	1.64	54.08	44.28	13.14	83.05	0.06	0	3.75	0
6053011900	5.83	4.39	**1-5% (lowest scores)**	Monterey	3991	5.36	54.32	40.32	8.42	74.62	1.45	0	13.08	2.43
6053012000	5.07	3.15	**1-5% (lowest scores)**	Monterey	4074	15.86	63.25	20.89	14.8	72.93	0.54	0	7.68	4.05
6053012100	4.97	2.98	**1-5% (lowest scores)**	Monterey	2113	9.42	59.25	31.33	13.3	73.88	0.8	0	6.58	5.44
6053012200	6.64	5.96	**5-10%**	Monterey	2755	8.93	65.08	25.99	9.55	83.09	1.78	0	1.2	4.39
6053012302	5.41	3.71	**1-5% (lowest scores)**	Monterey	2072	11.68	62.69	25.63	7.24	84.56	1.06	0.92	3.86	2.36
6053012401	6.22	5.14	**5-10%**	Monterey	1667	4.68	59.03	36.29	5.16	83.8	0.54	0.36	5.1	5.04
6053012402	6.66	6.04	**5-10%**	Monterey	2841	8.2	60.26	31.54	4.89	81.13	0.84	0	7.11	6.02
6053012502	10.00	12.92	**10-15%**	Monterey	4894	6.78	72.13	21.09	16.33	70.27	4.66	0	5.8	2.94
6053012600	NA	NA	**NA**	Monterey	2366	1.82	97.51	0.68	15.05	63.57	3.89	0.76	7.06	9.68
6053012700	13.44	21.55	**20-25%**	Monterey	3472	5.56	76.41	18.03	10.51	65.32	10.51	0.55	4.72	8.38
6053012800	7.50	7.65	**5-10%**	Monterey	4881	5.65	61.57	32.78	7.11	83.22	0.39	0	6.56	2.72
6053013000	20.34	38.38	**35-40%**	Monterey	3379	4.29	75.02	20.69	17.85	60.52	2.25	0.47	16.81	2.1
6053013100	6.01	4.65	**1-5% (lowest scores)**	Monterey	2200	41.86	58.14	0	9.91	65.05	5.82	0	13.05	6.18
6053013200	7.85	8.23	**5-10%**	Monterey	4176	7.45	60.46	32.09	7.18	79.65	1.22	0.6	9.63	1.72
6053013300	12.86	20.12	**20-25%**	Monterey	6199	13.36	73	13.65	31.54	52.27	2.45	0	7.71	6.03
6053013400	6.16	5.01	**5-10%**	Monterey	1525	10.03	66.75	23.21	12.46	72.07	3.8	0	7.15	4.52
6053013500	12.84	20.05	**20-25%**	Monterey	5029	15.07	66.18	18.75	31.2	34.22	16.7	0.26	12.88	4.73
6053013600	16.47	28.98	**25-30%**	Monterey	4679	13.38	73.28	13.34	54.41	29.73	3.06	0.38	7.44	4.98
6053013700	19.60	36.47	**35-40%**	Monterey	4325	11.63	78.91	9.46	63.1	17.36	3.65	0	14.79	1.09
6053013800	15.32	26.25	**25-30%**	Monterey	6200	13.37	74.92	11.71	47.42	20.24	7.94	0	19.86	4.55
6053013900	20.15	37.86	**35-40%**	Monterey	2362	7.11	76.29	16.6	35.44	40.77	2.92	0	12.36	8.51
6053014000	34.01	65.82	**65-70%**	Monterey	2427	14.5	73.01	12.48	47.47	33.37	4.12	0.54	9.64	4.86
6053014102	35.28	67.97	**65-70%**	Monterey	3399	15.18	71.29	13.53	32.6	30.74	11.53	0	17.13	8
6053014104	NA	NA	**NA**	Monterey	1892	0	100	0	43.39	37.58	5.39	0	6.61	7.03
6053014105	17.26	30.96	**30-35%**	Monterey	3461	15.31	78.5	6.18	28.08	53.86	2.72	0	7.19	8.15
6053014107	26.21	51.34	**50-55%**	Monterey	8240	23.56	71.52	4.93	27.78	46.49	5.96	0.21	9.58	9.98
6053014201	25.12	48.95	**45-50%**	Monterey	5414	12.3	71.54	16.16	31.94	33.76	4.01	0.04	18.38	11.88
6053014202	25.83	50.68	**50-55%**	Monterey	4411	16.71	66.38	16.91	25.89	40.67	4.85	0	21.85	6.73
6053014301	24.00	46.73	**45-50%**	Monterey	3561	11.46	68.97	19.57	27.58	35.36	9.49	0	20.79	6.8
6053014302	31.78	62.00	**60-65%**	Monterey	4471	16.22	72.51	11.27	34.89	36.43	4.54	0.74	13.1	10.29
6053014500	34.97	67.52	**65-70%**	Monterey	4474	15.91	65.78	18.31	54.85	33.55	0.98	0.07	7.64	2.91
6053014601	38.07	72.26	**70-75%**	Monterey	4980	11.04	79.74	9.22	75.16	21.59	0	0	0.72	2.53
6053014700	21.33	40.63	**40-45%**	Monterey	7873	15.79	73.86	10.35	61.62	26.8	2.51	0	5.96	3.11
6053014800	32.86	63.74	**60-65%**	Monterey	6527	17.07	76.87	6.07	89.47	5.39	0.44	0.15	4.14	0.4
6053980000	NA	NA	**NA**	Monterey	0	NA	NA	NA	NA	NA	NA	NA	NA	NA
6055200201	19.90	37.32	**35-40%**	Napa	3528	12.24	72.68	15.08	41.87	56.63	0.57	0	0.94	0
6055200202	22.50	43.23	**40-45%**	Napa	2461	8.41	73.59	18	41.2	51.16	3.13	0	3.05	1.46
6055200203	29.93	58.54	**55-60%**	Napa	2231	17.44	71.81	10.76	48.9	43.93	0.27	0	0	6.9
6055200301	35.69	68.71	**65-70%**	Napa	6037	12.24	78.58	9.18	55.04	39.82	0.35	0	2.82	1.97
6055200302	18.30	33.50	**30-35%**	Napa	2755	13.18	74.01	12.81	38.95	49.47	1.09	0	7.44	3.05

6055200400	10.93	15.32	**15-20%**	Napa	3747	6.81	69.68	23.51	17.93	75.26	0.35	0	2.16	4.3
6055200501	34.93	67.44	**65-70%**	Napa	5011	12.29	78.33	9.38	62	33.31	0	1.32	0.8	2.57
6055200503	26.98	52.96	**50-55%**	Napa	1706	9.09	80.6	10.32	43.61	51.99	0.53	0.88	1.82	1.17
6055200504	17.50	31.52	**30-35%**	Napa	6064	11.91	71.57	16.52	47.87	41.54	0.21	0.53	5.62	4.22
6055200505	17.47	31.44	**30-35%**	Napa	2583	12.35	75.11	12.54	44.48	40.38	0.62	0	11.73	2.79
6055200601	23.34	45.25	**45-50%**	Napa	5633	13.24	74.26	12.5	41.15	53.01	0.07	0	3.18	2.59
6055200602	19.96	37.47	**35-40%**	Napa	4124	8.95	69.03	22.02	34.48	61.2	0.17	0	3.32	0.82
6055200703	6.72	6.19	**5-10%**	Napa	2860	4.44	68.04	27.52	4.2	88.95	2.55	0.28	1.99	2.03
6055200704	28.05	55.11	**55-60%**	Napa	5312	10.39	73.53	16.08	42.88	51.39	0.17	0.02	2.67	2.86
6055200705	14.74	24.86	**20-25%**	Napa	3017	13.89	72.46	13.66	36.49	53.13	2.72	0.76	2.68	4.21
6055200706	9.77	12.38	**10-15%**	Napa	3213	12.11	67.26	20.63	25.49	68.97	0	0	4.86	0.68
6055200707	19.00	35.15	**35-40%**	Napa	3240	11.91	64.2	23.89	25.25	69.48	0.77	0	1.7	2.81
6055200802	20.60	39.06	**35-40%**	Napa	6228	13.39	67.5	19.11	41.09	50.43	0.48	0.21	3.99	3.79
6055200803	11.15	15.81	**15-20%**	Napa	2133	7.27	71.03	21.71	19.08	72.9	1.31	0	4.97	1.73
6055200804	29.13	57.09	**55-60%**	Napa	5573	16.78	76.19	7.03	69.76	25.98	0	0	0.5	3.75
6055200900	NA	NA	**NA**	Napa	757	1.98	80.32	17.7	17.31	50.73	21.66	0	9.91	0.4
6055201003	31.54	61.59	**60-65%**	Napa	5197	12.74	72.68	14.59	16.57	16.64	13.18	0	46.82	6.79
6055201004	14.49	24.33	**20-25%**	Napa	5980	11.56	75.08	13.36	29.21	21.32	8.96	0	36.24	4.26
6055201005	32.40	63.20	**60-65%**	Napa	2500	11.6	77.2	11.2	30.64	26.32	3.36	0.36	31.92	7.4
6055201006	16.77	29.87	**25-30%**	Napa	3314	12.95	74.95	12.1	33.55	33.74	2.2	0.09	27.58	2.84
6055201007	20.46	38.58	**35-40%**	Napa	4058	8.6	79.52	11.88	31.81	23.61	3.94	2.83	31.22	6.58
6055201101	7.04	6.86	**5-10%**	Napa	2054	8.37	68.84	22.78	18.26	77.85	0.15	0	2.53	1.22
6055201102	3.80	1.20	**1-5% (lowest scores)**	Napa	1904	5.25	66.75	27.99	9.03	80.62	0	3.89	5.41	1.05
6055201200	19.35	35.85	**35-40%**	Napa	5081	6.12	64.16	29.72	33.32	62.63	0	0	2.48	1.57
6055201300	19.94	37.39	**35-40%**	Napa	2987	2.71	49.11	48.18	17.04	73.59	2.51	0.3	3.18	3.38
6055201401	9.14	10.93	**10-15%**	Napa	3024	4.79	62.7	32.51	7.54	83.5	3.24	0	0.36	5.36
6055201402	6.40	5.50	**5-10%**	Napa	2917	3.98	63.83	32.19	4.53	93.21	0.07	0	1.3	0.89
6055201403	NA	NA	**NA**	Napa	738	12.06	71.41	16.53	18.83	76.83	0	0	2.71	1.63
6055201500	16.35	28.66	**25-30%**	Napa	1846	3.9	63.54	32.56	28.33	62.89	0.16	0	3.2	5.42
6055201601	15.12	25.79	**25-30%**	Napa	2783	16.49	61.77	21.74	40.89	55.98	0.61	0	1.26	1.26
6055201602	18.08	32.94	**30-35%**	Napa	3318	8.92	60.01	31.07	22.54	72.78	2.38	0	1.33	0.96
6055201700	10.51	14.13	**10-15%**	Napa	5288	7.03	76.06	16.91	21.26	57.62	5.5	0.36	11.12	4.14
6055201800	15.07	25.73	**25-30%**	Napa	1737	7.6	72.37	20.03	17.44	78.07	2.71	1.15	0.46	0.17
6055201900	12.58	19.38	**15-20%**	Napa	1413	4.95	70.06	24.98	26.75	63.62	0	0	5.66	3.96
6055202000	14.71	24.80	**20-25%**	Napa	5271	11.46	66.42	22.12	35.88	61.68	0	0	1.86	0.59
6057000102	4.56	2.33	**1-5% (lowest scores)**	Nevada	7040	11.42	60.67	27.91	6.39	86.34	0.7	0	0.51	6.07
6057000103	9.44	11.56	**10-15%**	Nevada	7787	6.31	65.66	28.03	7.36	86.59	0	0	0.69	5.36
6057000104	9.62	11.98	**10-15%**	Nevada	3149	9.02	55.73	35.25	8.64	87.3	0	0	2.09	1.97
6057000105	11.22	15.99	**15-20%**	Nevada	3143	5.79	68.53	25.68	6.87	90.23	0.03	1.37	0.1	1.4
6057000200	6.10	4.92	**1-5% (lowest scores)**	Nevada	2668	5.51	67.84	26.65	4.72	89.13	1.01	0.79	0.19	4.16
6057000300	8.75	10.10	**10-15%**	Nevada	2666	7.76	66.35	25.88	9.98	84.32	0.41	1.24	0.83	3.23
6057000401	8.96	10.55	**10-15%**	Nevada	5783	5.29	53.76	40.95	10.27	87.24	0.02	0.24	0.71	1.52
6057000402	12.63	19.50	**15-20%**	Nevada	5606	5.92	67.61	26.47	4.23	91.65	2.52	0.8	0.37	0.43
6057000501	28.98	56.90	**55-60%**	Nevada	5515	7.49	54.67	37.84	3.43	89.65	0.11	2.56	1.87	2.39
6057000502	26.41	51.68	**50-55%**	Nevada	4959	10.28	66.26	23.45	15.47	73.83	0	0.54	4.98	5.18
6057000600	35.78	68.84	**65-70%**	Nevada	6943	11.65	65.46	22.89	15.27	79.49	0.66	0.24	0.14	4.19
6057000701	13.07	20.71	**20-25%**	Nevada	7334	8.49	62.01	29.49	7.55	87.65	0	0.75	0.25	3.8
6057000702	12.37	18.94	**15-20%**	Nevada	3936	12.75	57.06	30.18	5.59	89.2	0.51	0	0.69	4.01
6057000801	11.34	16.23	**15-20%**	Nevada	5450	8.62	60.86	30.51	6.17	90.04	0.79	0	0.83	2.18
6057000802	16.20	28.40	**25-30%**	Nevada	6854	5.94	66.09	27.97	12.12	79.18	0.7	0.04	0.67	7.28
6057000900	14.20	23.52	**20-25%**	Nevada	3754	8.82	65.93	25.25	5.65	85.67	2.02	0.13	5.3	1.23
6057001203	5.10	3.18	**1-5% (lowest scores)**	Nevada	2538	13.04	66.08	20.88	2.21	93.7	0	0.35	1.46	2.29
6057001204	4.00	1.54	**1-5% (lowest scores)**	Nevada	2273	6.12	77.52	16.37	6.95	88.74	0	0	1.81	2.51
6057001205	1.93	0.21	**1-5% (lowest scores)**	Nevada	5183	13.8	73.76	12.44	4.73	94.25	0	0	0.56	0.46
6057001206	11.54	16.72	**15-20%**	Nevada	6663	16.18	73.75	10.07	30.18	66.11	0.14	0	1.76	1.82
6059001101	25.93	50.84	**50-55%**	Orange	5031	13.14	71.36	15.5	49.63	37.69	1.79	0.68	8.23	1.99
6059001102	29.66	58.08	**55-60%**	Orange	3237	13.35	73.25	13.41	45.75	33.18	3.55	0	14.8	2.72
6059001103	42.26	78.42	**75-80%**	Orange	4594	14.89	72.29	12.82	58.23	25.95	3.87	0.28	11.19	0.48

6059001201	45.20	82.21	80-85%	Orange	5594	15.8	76.67	7.53	80.8	12.96	0.41	0.54	4	1.29
6059001202	41.32	77.11	75-80%	Orange	3662	12.26	75.26	12.48	85.39	12.34	0	0	1.8	0.46
6059001301	34.81	67.26	65-70%	Orange	6519	11.37	75.09	13.55	50.13	30.34	0.74	0	18.5	0.29
6059001303	38.85	73.26	70-75%	Orange	5884	11.42	77.02	11.56	62.12	20.67	1.87	0.29	13.39	1.67
6059001304	54.82	92.37	90-95%	Orange	3982	16.5	71.15	12.36	74.89	14.44	1.43	0	8.19	1.05
6059001401	40.24	75.37	75-80%	Orange	4495	15.66	68.43	15.91	58	30.26	0.38	0.18	7.74	3.45
6059001402	33.60	65.18	65-70%	Orange	5023	14.69	75.67	9.64	59.05	31.16	1.11	0.56	6.97	1.15
6059001403	17.97	32.67	30-35%	Orange	3023	9.69	74.86	15.45	37.71	51.54	1.85	0	6.12	2.78
6059001404	54.80	92.36	90-95%	Orange	3934	13.78	81.01	5.21	81.06	14.54	0.38	0	3.25	0.76
6059001501	23.80	46.22	45-50%	Orange	5792	9.93	65.11	24.97	22.34	53.02	0.03	0	22.31	2.3
6059001503	22.84	44.05	40-45%	Orange	5049	11.82	75.58	12.6	34.64	47.24	1.41	0.97	13.32	2.42
6059001504	34.58	66.86	65-70%	Orange	4844	12.96	72.3	14.74	56.87	30.33	0.33	0	10.22	2.25
6059001505	15.64	26.99	25-30%	Orange	6931	9.67	77.75	12.58	24.66	48.68	2.45	0	18.48	5.73
6059001506	36.11	69.34	65-70%	Orange	4286	12.67	64.19	23.15	27.41	43.37	1.03	0	26.97	1.21
6059001507	25.95	50.87	50-55%	Orange	4745	9.63	80.06	10.31	29.21	46.17	2	0	20.57	2.04
6059001601	25.71	50.35	50-55%	Orange	7986	11.36	67.09	21.55	28.75	46.11	1.52	0	21.76	1.87
6059001602	10.16	13.34	10-15%	Orange	4924	9.63	71.24	19.13	13.81	50.43	0.28	0.37	32.11	3.01
6059001704	21.60	41.30	40-45%	Orange	8256	13.53	72.67	13.8	8.52	17.05	2.31	0.31	68.96	2.85
6059001705	24.91	48.55	45-50%	Orange	4002	16.09	67.92	15.99	40.33	35.28	1.1	0.9	19.64	2.75
6059001706	13.57	21.90	20-25%	Orange	3648	2.14	65.35	32.51	9.02	54.06	0.14	0	32.35	4.44
6059001707	24.34	47.47	45-50%	Orange	7291	5.99	77.7	16.31	15.43	13.7	1	0.26	67.11	2.5
6059001708	26.38	51.60	50-55%	Orange	3619	6.13	70.05	23.82	21.39	38.88	0	0.22	39.51	0
6059001801	44.04	80.91	80-85%	Orange	5510	12.61	79.71	7.68	68.48	17.48	2.47	0.56	9.33	1.69
6059001802	40.09	75.06	75-80%	Orange	7823	19.54	72.96	7.49	71.81	14.41	1.46	0	10.64	1.69
6059001901	27.16	53.37	50-55%	Orange	2552	11.68	75.98	12.34	51.21	27.98	2	0	17.39	1.41
6059001902	18.98	35.09	35-40%	Orange	3213	12.08	77.25	10.68	51.26	25.74	4.42	0	16.99	1.59
6059001903	38.46	72.91	70-75%	Orange	3713	19.39	72.45	8.16	64.02	17.21	1.24	0	16.7	0.83
6059011000	30.52	59.69	55-60%	Orange	6077	8.9	71.15	19.94	35.07	41.81	2.21	0	17.67	3.24
6059011101	26.57	52.16	50-55%	Orange	4191	16.63	72.89	10.47	56.55	28.42	1.26	1.53	10.81	1.43
6059011102	29.98	58.61	55-60%	Orange	4134	8.51	79.87	11.61	42.16	34.08	4.11	0.53	15.43	3.68
6059011200	25.63	50.19	50-55%	Orange	4374	10.49	72.63	16.87	35.12	44.38	1.85	0	13.28	5.37
6059011300	23.35	45.31	45-50%	Orange	5153	13.2	74.52	12.28	19.5	53.7	5.82	1.46	10.81	8.71
6059011401	25.87	50.76	50-55%	Orange	2219	12.12	73.1	14.78	27.49	58.04	3.06	0	7.89	3.52
6059011402	18.53	34.00	30-35%	Orange	2608	9.66	75	15.34	22.62	58.82	2.45	0	13.15	2.95
6059011403	41.49	77.32	75-80%	Orange	6654	17.63	72.41	9.96	56.21	28.73	1.79	0.26	8.37	4.64
6059011502	36.55	69.94	65-70%	Orange	4485	14.2	76.16	9.63	46.22	31.24	3.1	0	16.57	2.88
6059011503	20.84	39.66	35-40%	Orange	1839	5.49	73.68	20.83	17.78	54.49	0.54	0	23.76	3.43
6059011504	36.75	70.23	70-75%	Orange	5916	5.92	90.28	3.8	35.6	35.4	4.23	0.32	21.26	3.19
6059011601	58.33	94.65	90-95%	Orange	8430	17.31	74.48	8.21	75.72	11.7	5.33	0.32	6.17	0.77
6059011602	50.20	88.07	85-90%	Orange	5314	12.01	74.01	13.98	79.79	12.78	1.77	0	4.65	1.02
6059011707	20.47	38.63	35-40%	Orange	5911	8.44	76.3	15.26	14.97	55.05	1.22	0	23.04	5.72
6059011708	19.83	37.00	35-40%	Orange	4566	9.96	83.64	6.4	28.36	47.94	2.61	0	18.18	2.91
6059011709	17.33	31.15	30-35%	Orange	4610	10.37	70.59	19.05	22.3	58.16	1.82	0	14.42	3.3
6059011710	17.53	31.67	30-35%	Orange	3455	12.76	69.32	17.92	22.72	53.52	1.1	0.32	17.11	5.24
6059011711	28.89	56.74	55-60%	Orange	7878	13.82	77.94	8.24	58.38	24.31	3.11	0.24	10.15	3.81
6059011712	28.78	56.52	55-60%	Orange	4734	7.08	81.52	11.41	53.72	24.65	0.36	0	16.33	4.94
6059011714	42.61	78.83	75-80%	Orange	898	13.7	83.52	2.78	43.21	27.62	8.46	0	14.25	6.46
6059011715	16.00	27.80	25-30%	Orange	6437	9.8	67.45	22.74	22.67	55.94	2.28	0	17.18	1.93
6059011716	30.55	59.73	55-60%	Orange	5223	7.95	76.34	15.72	28.07	29.93	0.21	0	39.4	2.39
6059011717	20.67	39.25	35-40%	Orange	2680	10.9	69.22	19.89	21.42	61.19	1.6	0	13.51	2.28
6059011718	14.80	25.06	25-30%	Orange	3458	10.9	70.07	19.03	22.76	57.84	0.09	0	13.13	6.19
6059011720	49.84	87.67	85-90%	Orange	6573	20.55	75.49	3.96	88.83	3.77	1.72	0	4.21	1.46
6059011721	43.90	80.69	80-85%	Orange	5364	15.03	78.73	6.25	75.04	16.07	2.16	0	5.94	0.78
6059011722	36.05	69.21	65-70%	Orange	2259	4.87	58.7	36.43	36.3	41.48	2.48	0	18.86	0.89
6059021802	20.23	38.04	35-40%	Orange	6981	16.3	60.94	22.76	21.62	66.38	0.32	0.01	9.86	1.82
6059021807	18.54	34.06	30-35%	Orange	4438	9.91	73.95	16.13	35.65	51.44	1.37	0.27	10.5	0.77
6059021809	12.94	20.41	20-25%	Orange	3188	9.28	68.57	22.15	14.21	64.81	0.91	0.31	14.52	5.24
6059021810	7.98	8.47	5-10%	Orange	3570	10.36	71.4	18.24	21.85	59.1	2.55	0	13.11	3.39

6059021812	10.51	14.12	10-15%	Orange	6535	11.32	76.22	12.46	32.01	56.16	0.29	0	8.28	3.26
6059021813	NA	NA	NA	Orange	4	0	100	0	100	0	0	0	0	0
6059021814	22.51	43.27	40-45%	Orange	7192	9	77.38	13.63	24.51	46.36	5.38	0	19.29	4.46
6059021815	18.95	34.97	30-35%	Orange	11591	16.34	71.91	11.75	15.35	38.93	2.33	0.36	39.26	3.77
6059021816	9.46	11.57	10-15%	Orange	4966	11.12	69.55	19.33	21.02	65.83	0	0	7.35	5.8
6059021817	7.75	8.06	5-10%	Orange	3848	13.67	69.8	16.53	28.56	60.27	0	0	6.63	4.55
6059021820	11.49	16.58	15-20%	Orange	4259	13.41	70.32	16.27	20.29	55.51	2.11	0	19	3.1
6059021821	18.79	34.72	30-35%	Orange	7772	13.45	81.3	5.25	29.62	41.06	4.22	0	22.23	2.87
6059021822	12.73	19.73	15-20%	Orange	9543	11.39	73.24	15.37	10.49	49.71	1.12	0	35.75	2.93
6059021823	8.92	10.50	10-15%	Orange	4238	11.35	75.84	12.81	17.7	57.93	0	0.9	22.61	0.87
6059021824	8.52	9.63	5-10%	Orange	2782	10.32	72.21	17.47	14.67	65.42	0	0	11.43	8.48
6059021825	11.21	15.96	15-20%	Orange	2940	9.29	68.3	22.41	13.71	59.05	1.73	0	22.93	2.59
6059021826	19.68	36.70	35-40%	Orange	2806	18.89	73.59	7.52	19.42	55.42	6.56	0.32	16.11	2.17
6059021827	9.80	12.43	10-15%	Orange	3064	13.58	70.59	15.83	21.77	46.05	2.61	0	27.87	1.7
6059021828	5.39	3.68	1-5% (lowest scores)	Orange	4146	8.1	74.29	17.61	20.77	48.94	1.42	0	26.6	2.27
6059021829	6.69	6.11	5-10%	Orange	5278	10.16	64.55	25.29	13.57	52.88	0.53	0	32.06	0.97
6059021830	4.17	1.78	1-5% (lowest scores)	Orange	5943	7.18	73.85	18.96	12.86	66.11	0.72	0	15.06	5.25
6059021903	27.04	53.13	50-55%	Orange	3825	8.81	74.46	16.73	33.57	46.59	1.33	0	15.03	3.48
6059021905	13.47	21.61	20-25%	Orange	5145	11.21	67.52	21.26	23.69	55.59	3.48	0	14.86	2.37
6059021912	10.60	14.42	10-15%	Orange	4365	8.18	71.75	20.07	14.16	63.76	0	0	18.74	3.34
6059021913	25.35	49.58	45-50%	Orange	7435	12.2	76.52	11.28	62.97	23.9	0.15	0	12.21	0.77
6059021914	12.09	18.18	15-20%	Orange	4306	13.38	70.02	16.6	34.16	51.35	2.3	0.35	8.45	3.39
6059021915	21.61	41.31	40-45%	Orange	3997	9.63	63.22	27.15	20.77	54.74	0.45	0	21.89	2.15
6059021916	10.22	13.53	10-15%	Orange	3308	6.17	62.88	30.96	7.53	68.11	0	0	23.04	1.33
6059021917	13.27	21.17	20-25%	Orange	3221	7.7	70.54	21.76	12.57	74.08	0.96	0	8.38	4
6059021918	17.98	32.69	30-35%	Orange	4710	7.86	73.18	18.96	25.65	59.32	0	0	10.91	4.12
6059021919	13.99	23.01	20-25%	Orange	2825	9.06	70.44	20.5	13.7	66.16	0.99	0	13.42	5.73
6059021920	8.71	9.97	5-10%	Orange	7041	9.42	73.57	17.01	17.65	54.65	0.95	0	23.19	3.55
6059021921	8.35	9.23	5-10%	Orange	4217	8.51	74.6	16.88	13.23	54.99	3.2	0	25.52	3.06
6059021922	13.69	22.19	20-25%	Orange	4841	8.86	74.45	16.69	17.62	56.56	3.2	0	18.28	4.34
6059021923	9.16	11.01	10-15%	Orange	7141	11.51	77.59	10.89	18.33	52.57	2.42	0	21.71	4.97
6059021924	14.08	23.25	20-25%	Orange	4314	11.38	78.03	10.59	18.1	49.98	2.34	0	24.85	4.73
6059032002	9.71	12.24	10-15%	Orange	6833	10.55	71.29	18.16	18.79	67.61	0.66	0	9.28	3.66
6059032003	8.35	9.29	5-10%	Orange	4824	9.06	70.96	19.98	15.03	69.42	0.56	1.55	9.83	3.61
6059032011	11.21	15.95	15-20%	Orange	1639	8.24	69.68	22.09	18.36	78.16	0.37	0	0.61	2.5
6059032012	14.04	23.15	20-25%	Orange	4104	12.52	66.06	21.42	20.18	68.23	0.46	0.19	7.26	3.68
6059032013	14.78	25.00	25-30%	Orange	5275	7.37	62.69	29.93	12.74	65.9	2.46	0	10.75	8.15
6059032014	32.35	63.09	60-65%	Orange	6397	11.68	64.05	24.28	46.41	35.27	2.47	0.45	10.54	4.86
6059032015	14.79	25.04	25-30%	Orange	6679	7.5	65.86	26.64	15.59	61.19	0.72	0	18.16	4.34
6059032020	7.13	7.01	5-10%	Orange	5890	11.61	73.84	14.55	17.08	65.4	0.95	0	11.68	4.89
6059032022	19.68	36.69	35-40%	Orange	6792	14.36	72.22	13.43	47.88	38.6	2.27	0.38	8.92	1.94
6059032023	6.85	6.48	5-10%	Orange	15339	16.27	71.37	12.35	13.66	73.86	1.6	0.23	5.97	4.68
6059032027	18.58	34.14	30-35%	Orange	6583	13.17	76.79	10.04	37.26	42.47	0.36	0	15.38	4.51
6059032028	12.45	19.11	15-20%	Orange	3247	9.42	79.86	10.72	29.57	53.13	1.45	0	12.96	2.89
6059032029	9.64	12.07	10-15%	Orange	4297	14.29	76.03	9.68	22.6	60.67	0.67	0.26	12.15	3.65
6059032030	6.84	6.47	5-10%	Orange	3971	7.98	73.96	18.06	23.87	64.01	0.48	0	9.17	2.47
6059032031	4.06	1.63	1-5% (lowest scores)	Orange	3641	9.64	72.04	18.32	17.85	64.9	1.73	0	12.11	3.41
6059032032	9.44	11.54	10-15%	Orange	3065	8.84	74.75	16.41	17.46	65.35	0	0	10.41	6.79
6059032033	9.40	11.43	10-15%	Orange	3623	9.72	76.76	13.52	22.96	56.44	0.63	0.52	16.12	3.31
6059032034	10.25	13.59	10-15%	Orange	5786	13	71.53	15.47	15.26	60.8	3.91	0	15.8	4.23
6059032035	13.76	22.37	20-25%	Orange	2461	10.12	61.64	28.24	14.63	64.53	2.32	0	15.64	2.89
6059032036	8.78	10.12	10-15%	Orange	3674	11.43	69.27	19.3	16.96	73.49	0.33	0	7.18	2.04
6059032037	9.63	12.04	10-15%	Orange	4882	3.01	44.47	52.52	6	77.9	3.01	0	11.76	1.33
6059032038	7.54	7.77	5-10%	Orange	6361	10.14	77.72	12.14	12.53	65.54	0	0	15.55	6.38
6059032039	9.98	12.86	10-15%	Orange	6762	12.29	77.21	10.5	19.18	63.95	0	0	12.47	4.41
6059032040	8.36	9.33	5-10%	Orange	2620	9.92	69.54	20.53	9.85	72.9	0.5	0	10.34	6.41
6059032041	7.69	8.02	5-10%	Orange	1011	8.7	78.34	12.96	13.85	71.12	0.2	0.4	9.2	5.24
6059032042	3.85	1.29	1-5% (lowest scores)	Orange	5355	11.24	80.45	8.31	15.72	73.73	0.95	0.92	4.95	3.73

6059032043	5.58	3.95	1-5% (lowest scores)	Orange	3736	10.04	77.94	12.02	10.71	76.18	1.63	0	6.69	4.79
6059032044	7.51	7.68	5-10%	Orange	5700	7	73.35	19.65	7.7	78.46	2.23	0.3	8.05	3.26
6059032045	2.49	0.45	1-5% (lowest scores)	Orange	3352	11.69	82.91	5.4	12.65	77.74	0.45	0	6.36	2.8
6059032046	1.80	0.15	1-5% (lowest scores)	Orange	6004	9.09	76.93	13.97	8.83	77.91	0.2	0	9.71	3.35
6059032047	10.83	15.04	15-20%	Orange	4534	11.36	80.48	8.16	22.36	63.74	2.1	0.53	8.58	2.69
6059032048	9.08	10.78	10-15%	Orange	5742	8.34	65.78	25.88	14.26	68.65	7.35	0	6.48	3.26
6059032049	8.69	9.93	5-10%	Orange	9613	11.98	81.9	6.12	17.09	58.09	0.73	0.42	18.51	5.17
6059032050	6.07	4.84	1-5% (lowest scores)	Orange	5143	14.82	77.95	7.23	18.53	61	1.83	0	8.46	10.19
6059032051	9.51	11.75	10-15%	Orange	4423	13.41	74.86	11.73	33.57	51.55	2.17	0	9.18	3.53
6059032053	8.71	9.98	5-10%	Orange	8131	9.97	80.7	9.32	14.14	65.12	3.63	0	13.91	3.2
6059032054	16.42	28.86	25-30%	Orange	5452	17.92	67.19	14.89	25.18	57.08	3.23	0	8.22	6.29
6059032055	10.76	14.84	10-15%	Orange	3671	12.42	79.41	8.17	31.57	53.55	1.25	0	9.84	3.79
6059032056	8.84	10.31	10-15%	Orange	10803	15.73	74.66	9.62	17.18	62.46	2.03	0	12.31	6.02
6059032057	7.01	6.78	5-10%	Orange	8499	15.68	76.51	7.8	13.85	64.31	0	1.18	11.79	8.87
6059032058	4.02	1.56	1-5% (lowest scores)	Orange	8226	22.54	73.12	4.34	10.88	73.45	0.43	0	9.81	5.43
6059032059	4.18	1.82	1-5% (lowest scores)	Orange	10275	22.43	71.83	5.73	15.57	63.69	1.89	0	16.59	2.26
6059032061	8.31	9.17	5-10%	Orange	5521	13.24	61.44	25.32	11.03	75.26	0	0	7.05	6.67
6059042103	12.23	18.49	15-20%	Orange	8067	9.12	71.44	19.44	12.35	78.96	0	0	4.16	4.52
6059042106	10.73	14.74	10-15%	Orange	1696	7.55	60.73	31.72	8.84	76.71	0.71	0	10.67	3.07
6059042107	21.49	41.09	40-45%	Orange	3490	15.79	78.22	5.99	34.58	61.86	0	0	2.41	1.15
6059042108	21.95	42.01	40-45%	Orange	4997	6.52	81.83	11.65	20.49	74.04	0.84	0	1.96	2.66
6059042109	7.80	8.18	5-10%	Orange	5175	4.83	76.52	18.65	23.81	67.11	0.15	0	4.68	4.25
6059042111	9.09	10.79	10-15%	Orange	6004	7.69	70.44	21.87	13.71	82.54	0	0.42	2.02	1.32
6059042112	9.48	11.67	10-15%	Orange	6700	11.81	72.21	15.99	12.57	76.57	0.28	1.31	7.18	2.09
6059042113	12.82	19.97	15-20%	Orange	4294	5.96	64.3	29.74	11.85	80.67	0.75	0.65	2.68	3.4
6059042114	11.97	17.86	15-20%	Orange	3636	8.75	73.32	17.93	16.75	75.22	0.3	0	2.48	5.25
6059042201	20.08	37.71	35-40%	Orange	5207	4.82	67.12	28.06	19.93	71.62	1.4	0	2.59	4.46
6059042203	11.51	16.64	15-20%	Orange	7896	11.73	61.99	26.28	14.82	79.67	1.33	0	2.03	2.15
6059042205	10.18	13.40	10-15%	Orange	6813	10.57	69.93	19.51	19.52	70.94	0.7	0	4.2	4.64
6059042206	6.10	4.93	1-5% (lowest scores)	Orange	3478	8.11	64.78	27.11	15.27	77.66	2.27	0	2.56	2.24
6059042305	11.58	16.79	15-20%	Orange	3492	6.96	67.67	25.37	6.93	84.42	0	0	4.75	3.89
6059042307	17.47	31.42	30-35%	Orange	7090	14.89	68.62	16.49	24.84	47.35	2.55	0	19.31	5.95
6059042310	19.84	37.13	35-40%	Orange	8190	11.97	66.37	21.66	33.04	59.07	0	0.5	1.53	5.86
6059042311	17.62	31.87	30-35%	Orange	6022	10.33	64.13	25.54	18.62	73.95	1.05	0	3.64	2.76
6059042312	37.97	72.09	70-75%	Orange	9752	14.36	76.44	9.21	69.32	27.36	0.14	0.31	2.47	0.4
6059042313	22.19	42.54	40-45%	Orange	6723	9.64	76.29	14.07	32.1	60.63	0.36	0	4.72	2.2
6059042315	11.25	16.02	15-20%	Orange	5824	5.2	76.91	17.89	14.37	67.74	3.19	0	10.99	3.71
6059042317	4.20	1.87	1-5% (lowest scores)	Orange	3156	6.18	64.58	29.25	7.22	82.29	0.7	0	5.74	4.06
6059042319	5.37	3.63	1-5% (lowest scores)	Orange	3448	12.94	65.2	21.87	8.56	71.81	0.41	0	12.99	6.24
6059042320	11.09	15.63	15-20%	Orange	6011	10.85	80.19	8.97	34.72	49.44	1.45	0	10.45	3.94
6059042323	7.36	7.41	5-10%	Orange	4913	5.25	66.48	28.27	5.9	86.04	2.3	0	3.87	1.89
6059042324	8.36	9.32	5-10%	Orange	4465	2.55	59.8	37.65	11.06	84.57	0	0.72	1.86	1.79
6059042325	6.86	6.53	5-10%	Orange	3551	7.58	68.04	24.39	6.96	75.53	1.86	0	13.49	2.17
6059042326	5.23	3.44	1-5% (lowest scores)	Orange	4781	10.92	70.4	18.68	12.65	63.5	2.7	0	11.55	9.6
6059042327	13.27	21.15	20-25%	Orange	5124	6.64	73.79	19.57	16.02	67.6	0.6	0	11.22	4.55
6059042328	8.24	9.03	5-10%	Orange	2526	8.79	72.33	18.88	9.14	74.94	0.08	0	11.17	4.67
6059042329	7.49	7.63	5-10%	Orange	4059	9.16	68.83	22	11.21	75.88	1.43	0	7.56	3.92
6059042330	11.44	16.46	15-20%	Orange	6489	21.07	69.76	9.17	34.63	51.83	1.02	0	9.86	2.67
6059042331	8.82	10.25	10-15%	Orange	6215	12.87	75.99	11.13	39.1	49.07	0	0	5.44	6.39
6059042332	3.24	0.82	1-5% (lowest scores)	Orange	5318	7.47	70.87	21.66	12.45	73.75	0.38	0	10.57	2.86
6059042333	6.54	5.84	5-10%	Orange	4207	7.58	70.91	21.51	7.75	73.16	0.57	0	15.28	3.23
6059042334	10.67	14.59	10-15%	Orange	5453	8.58	73.83	17.59	14.58	56.67	1.93	0	14.85	11.98
6059042335	10.91	15.24	15-20%	Orange	6869	12.35	78.16	9.49	15.77	59.79	0.57	0	16.2	7.67
6059042336	4.60	2.42	1-5% (lowest scores)	Orange	4201	9.47	74.96	15.57	6.02	78.48	0.67	0	10.24	4.59
6059042337	5.26	3.47	1-5% (lowest scores)	Orange	3352	6.8	75.45	17.75	11.84	74.4	0.36	0	9.67	3.73
6059042338	6.65	6.03	5-10%	Orange	4603	9.06	69.13	21.81	9.02	78.91	3.8	0.37	4.13	3.78
6059042339	11.72	17.15	15-20%	Orange	3472	9.22	69.18	21.6	19.79	70.77	0.69	0	4.84	3.92
6059052404	17.51	31.58	30-35%	Orange	4220	11.37	84.22	4.41	8.15	30.33	0.45	0	54.97	6.09

6059052408	12.69	19.64	15-20%	Orange	6342	8.97	73.26	17.77	13.56	66.67	0	0	17.06	2.71
6059052410	43.41	80.04	80-85%	Orange	5452	7.13	70.25	22.62	21.61	50.04	1.67	0	22.38	4.31
6059052411	33.82	65.57	65-70%	Orange	5264	6.59	76.29	17.12	39.32	36.95	2.32	0	16.91	4.5
6059052415	12.67	19.59	15-20%	Orange	4110	11.63	69.2	19.17	14.5	71.78	0	0.17	11.56	2
6059052416	21.31	40.60	40-45%	Orange	4318	13.27	74.04	12.69	38.37	47.55	0.63	1.57	9.03	2.85
6059052417	10.23	13.55	10-15%	Orange	7893	11.72	68.25	20.03	7.3	43	1.34	0	43.78	4.57
6059052418	20.89	39.80	35-40%	Orange	21717	17.2	77.08	5.72	7.13	33.09	3.3	0.09	52.31	4.09
6059052419	12.56	19.33	15-20%	Orange	3434	12.26	78.01	9.73	11.12	46.36	0.38	0	35.09	7.05
6059052420	11.50	16.62	15-20%	Orange	23390	13.63	80.2	6.17	9.37	31.78	0.32	0	55.72	2.81
6059052421	13.90	22.77	20-25%	Orange	5447	9.97	75.03	15	8.67	40.76	0	0	47.37	3.21
6059052422	23.01	44.52	40-45%	Orange	8974	17.58	72.6	9.82	15.38	41.21	6.49	0	31.4	5.53
6059052423	20.83	39.64	35-40%	Orange	5905	11.79	78.12	10.09	23.39	50.53	2.74	0	17.22	6.11
6059052424	18.18	33.13	30-35%	Orange	4884	11.67	76.66	11.67	17.28	58.09	0.18	2.44	18.24	3.77
6059052425	19.24	35.67	35-40%	Orange	5925	9.57	77.22	13.22	19.24	56.61	3.61	0	17.61	2.94
6059052426	16.84	30.03	30-35%	Orange	20544	17.59	75.64	6.77	6.23	35.09	0.79	0.33	52.73	4.84
6059052427	11.07	15.62	15-20%	Orange	5662	12.54	79.72	7.74	9.77	57.88	2.49	0	24.23	5.63
6059052428	5.85	4.41	1-5% (lowest scores)	Orange	6359	15.87	76.18	7.96	11.37	67.45	1.51	0	16.39	3.29
6059052502	25.92	50.82	50-55%	Orange	5951	10.87	70.69	18.43	28.03	47.94	0.97	0	17.93	5.13
6059052505	17.83	32.32	30-35%	Orange	5283	7.14	72.31	20.56	12.28	38.07	2.2	0	42.46	5
6059052506	18.08	32.93	30-35%	Orange	2561	8.28	71.57	20.15	9.61	51	2.3	0	31.75	5.35
6059052511	14.13	23.39	20-25%	Orange	6532	14.25	69.72	16.03	8.14	54.94	1.87	0	31.09	3.95
6059052513	15.93	27.66	25-30%	Orange	5728	10.46	70.57	18.98	10.04	58.55	1.43	0	28.63	1.34
6059052514	14.42	24.09	20-25%	Orange	5202	12.36	74.22	13.42	15.07	53.09	0	0.29	26.11	5.44
6059052515	20.40	38.46	35-40%	Orange	9253	19.27	73.73	7	7.98	40.44	0.76	0	44.53	6.3
6059052517	26.80	52.63	50-55%	Orange	10849	13.5	77.37	9.13	6.96	36.79	0.6	0	49.99	5.67
6059052518	24.93	48.59	45-50%	Orange	7589	12.07	82.28	5.65	9.14	54.16	1.19	0	31.44	4.07
6059052519	21.30	40.56	40-45%	Orange	4565	14	74.28	11.72	9.79	55.12	1.47	1.45	25.83	6.35
6059052520	13.57	21.92	20-25%	Orange	3665	14.3	68.4	17.3	14.05	51.76	0.33	0	26.08	7.78
6059052521	19.84	37.12	35-40%	Orange	5147	9.56	86.07	4.37	13.1	49.04	3.13	0	29.9	4.84
6059052522	16.71	29.64	25-30%	Orange	4222	11.63	75.77	12.6	11.96	39.18	0	0	44.13	4.74
6059052523	21.34	40.68	40-45%	Orange	4510	11.75	80.86	7.38	10.27	44.61	1.64	0	38.83	4.66
6059052524	18.53	34.01	30-35%	Orange	7988	12.18	79.42	8.4	23.51	35.37	5.21	0	32.42	3.49
6059052525	15.51	26.73	25-30%	Orange	19462	14.88	72.67	12.45	9.5	32.58	0.81	0	51.93	5.18
6059052526	16.68	29.59	25-30%	Orange	4794	9.49	73.47	17.04	18.27	39.36	0.92	0	34.52	6.93
6059052527	12.01	17.99	15-20%	Orange	8917	10.58	76.94	12.48	7.61	34.48	5.46	0	44.35	8.09
6059052528	10.45	13.97	10-15%	Orange	4059	15.2	70.51	14.29	19.41	37.99	0.99	0.32	39.42	1.87
6059062604	11.35	16.24	15-20%	Orange	15355	13.99	71.46	14.56	7.56	56.8	0.35	0.29	31.13	3.87
6059062605	12.63	19.53	15-20%	Orange	3028	3.57	74.04	22.39	12.09	80.42	2.48	0.4	3.63	0.99
6059062610	21.72	41.58	40-45%	Orange	10440	3.07	89.28	7.65	9.93	49.43	3.68	0	34.5	2.45
6059062611	31.16	60.98	60-65%	Orange	4963	9.21	81.46	9.33	16.74	28.29	7.72	0	44.77	2.48
6059062612	15.85	27.46	25-30%	Orange	8225	8.78	74.84	16.38	8.74	60.63	1.02	0	24.92	4.68
6059062614	23.36	45.36	45-50%	Orange	17197	3.84	93.73	2.44	24.44	34.79	1.45	0.17	33.68	5.48
6059062619	6.09	4.89	1-5% (lowest scores)	Orange	3867	7.5	64.49	28.01	6.49	85.78	0.62	0	1.76	5.35
6059062620	5.11	3.20	1-5% (lowest scores)	Orange	5053	9.4	65.11	25.49	6.95	82.72	1.29	0	4.27	4.77
6059062621	14.83	25.13	25-30%	Orange	12331	14.17	73.28	12.55	12.63	51.54	1.57	0	29.28	4.97
6059062622	19.35	35.84	35-40%	Orange	3868	0.36	27.84	71.79	7.89	71.04	0.36	0	19.03	1.68
6059062625	18.26	33.37	30-35%	Orange	3975	8.98	52.18	38.84	32.53	51.27	0.28	0	12.91	3.02
6059062626	24.01	46.76	45-50%	Orange	3167	5.9	90.62	3.47	18.38	30.6	1.96	0	47.52	1.55
6059062627	23.42	45.41	45-50%	Orange	3549	3.18	75.57	21.25	10.9	37.73	2.59	0	45.39	3.38
6059062628	13.85	22.59	20-25%	Orange	3812	7.76	81.51	10.73	10.86	41.42	1.89	2.54	38.7	4.59
6059062629	6.40	5.52	5-10%	Orange	2545	10.57	66.33	23.1	4.28	55.72	0.2	0	35.6	4.2
6059062630	8.19	8.91	5-10%	Orange	1739	7.65	64.92	27.43	14.15	56.24	2.19	0	23.63	3.8
6059062631	4.87	2.86	1-5% (lowest scores)	Orange	3182	7.48	61.47	31.05	3.65	63.04	0	0.57	28.79	3.96
6059062632	8.09	8.75	5-10%	Orange	4089	6.16	66.13	27.71	8.63	82.44	0.73	0	2.86	5.33
6059062633	3.85	1.30	1-5% (lowest scores)	Orange	6480	13.32	79.31	7.38	10.52	68.56	0.06	0.05	18.27	2.53
6059062634	8.06	8.66	5-10%	Orange	5121	13.4	76.31	10.29	13.38	65.42	2.17	0	14.59	4.45
6059062635	5.10	3.19	1-5% (lowest scores)	Orange	4160	11.83	77.19	10.99	14.4	61.68	0.94	1.92	19.06	2
6059062636	8.87	10.38	10-15%	Orange	4067	13.74	79.96	6.29	26.6	51.83	3.49	0	12.12	5.95

6059062637	11.80	17.31	15-20%	Orange	5188	12.26	79.34	8.4	16.65	61.1	1.6	0	11.47	9.18
6059062638	9.31	11.22	10-15%	Orange	6737	15.42	77.32	7.26	18.42	52.89	3.12	0	22.02	3.56
6059062639	8.53	9.68	5-10%	Orange	7277	15.42	74.15	10.43	13.65	59.15	3.7	0	14.36	9.15
6059062640	9.64	12.10	10-15%	Orange	3741	10.99	81.77	7.24	16.47	63.22	4.95	0	11.76	3.61
6059062641	10.57	14.33	10-15%	Orange	5376	13.28	61.98	24.74	22.02	55.25	1.38	0	17.76	3.59
6059062642	3.04	0.68	1-5% (lowest scores)	Orange	2834	5.93	49.65	44.42	5.61	89.63	0.39	0	2.93	1.45
6059062643	6.54	5.85	5-10%	Orange	7231	7.97	67.74	24.3	4.45	63.93	0	0.3	25.21	6.1
6059062644	8.87	10.40	10-15%	Orange	8487	10.49	72.32	17.19	8.85	82.08	0	0	7.97	1.11
6059062645	6.03	4.74	1-5% (lowest scores)	Orange	6527	11.03	68.44	20.53	3.83	74.77	0.29	0	20.24	0.87
6059062646	23.07	44.69	40-45%	Orange	3433	0.32	16.08	83.6	6.99	69.18	2.91	0	19.17	1.75
6059062647	26.41	51.69	50-55%	Orange	4553	6.92	48.85	44.23	21.83	56.84	3.73	0.29	17.31	0
6059062648	17.31	31.08	30-35%	Orange	2640	0	16.29	83.71	4.17	72.95	0	0	19.32	3.56
6059062649	12.69	19.65	15-20%	Orange	3204	3.75	41.39	54.87	11.83	69.26	0	0	17.23	1.69
6059062701	6.74	6.24	5-10%	Orange	2764	5.1	66.24	28.65	6.69	87.74	2.93	0	1.63	1.01
6059062702	5.90	4.50	1-5% (lowest scores)	Orange	4245	7.66	64.57	27.77	13.31	83.11	0	0	1.27	2.31
6059062800	13.47	21.63	20-25%	Orange	3888	2.73	71.24	26.03	8.59	86.19	1.67	0	1.82	1.72
6059062900	8.29	9.10	5-10%	Orange	1527	5.89	57.5	36.61	2.23	91.09	0	0	6.68	0
6059063004	13.97	22.95	20-25%	Orange	6718	8.38	66	25.62	6	82.55	2.46	0.4	6.36	2.23
6059063005	6.73	6.22	5-10%	Orange	1406	2.49	59.74	37.77	2.49	89.05	3.56	0	4.2	0.71
6059063006	6.48	5.69	5-10%	Orange	2519	6.27	52.48	41.25	1.91	97.42	0	0	0.67	0
6059063007	19.17	35.59	35-40%	Orange	6285	9.55	62.9	27.56	7.75	80.08	0	0	9.37	2.8
6059063008	18.22	33.30	30-35%	Orange	1093	4.67	46.66	48.67	1.46	87.28	0	0	11.25	0
6059063009	6.95	6.66	5-10%	Orange	1835	13.02	61.85	25.12	2.34	87.19	0	0	7.79	2.67
6059063010	9.43	11.52	10-15%	Orange	6275	8.56	77.86	13.58	7.14	81.66	2.28	0	5.53	3.39
6059063101	18.64	34.33	30-35%	Orange	3236	11.5	80.38	8.13	29.79	56.09	5.38	0.28	5.96	2.5
6059063102	14.25	23.69	20-25%	Orange	6971	14.35	69.23	16.43	15.41	75.44	0.17	0.04	3.64	5.29
6059063103	11.36	16.28	15-20%	Orange	2636	9.03	73.33	17.64	18.66	75.27	0.95	0.27	2.88	1.97
6059063201	17.95	32.58	30-35%	Orange	4016	10.96	80.78	8.27	18.6	72.36	1.1	0	4.93	3.01
6059063202	20.94	39.88	35-40%	Orange	3768	10.27	76.35	13.38	17.04	70.44	0.56	0	3.82	8.15
6059063301	19.54	36.30	35-40%	Orange	2946	7.54	84.32	8.15	12.8	82.38	1.53	0	2.58	0.71
6059063302	14.65	24.65	20-25%	Orange	4457	8.32	80.66	11.02	10.59	81.58	0.85	0	4.85	2.13
6059063400	10.82	15.03	15-20%	Orange	4906	9.27	68.94	21.79	4.79	86.4	0.33	0.22	5.63	2.63
6059063500	17.54	31.68	30-35%	Orange	6360	2.03	83.44	14.53	15.28	79.75	0	0	2.8	2.17
6059063601	8.52	9.66	5-10%	Orange	3835	8.94	78.98	12.07	26.23	62.32	4.54	0	4.82	2.09
6059063603	16.39	28.74	25-30%	Orange	6173	6.67	75.15	18.18	17.87	72.82	0.03	0.1	5.49	3.69
6059063604	33.33	64.64	60-65%	Orange	4070	11.7	74.05	14.25	49.21	40.91	0.37	0.79	4.72	4
6059063605	45.06	82.07	80-85%	Orange	5387	13.14	81.21	5.64	76.42	19.97	0.85	0	1.15	1.6
6059063701	34.43	66.59	65-70%	Orange	5930	16.02	75.38	8.6	74.01	16.9	1.13	0	5.89	2.07
6059063702	31.89	62.23	60-65%	Orange	6583	12.11	78.38	9.51	55.13	37.31	0.17	0	3.22	4.18
6059063802	15.50	26.66	25-30%	Orange	2857	12.22	65.98	21.81	22.47	65.52	1.3	0	7.25	3.47
6059063803	13.93	22.82	20-25%	Orange	4416	10.3	75.75	13.95	31.84	58.36	0.75	0.57	6.38	2.11
6059063805	18.96	35.04	35-40%	Orange	2615	12.62	70.75	16.63	20.76	69.52	0	0	7.38	2.33
6059063806	20.31	38.28	35-40%	Orange	3836	13.48	70.13	16.4	24.74	63.97	0	0	6.89	4.41
6059063807	24.43	47.69	45-50%	Orange	4910	12.89	72.55	14.56	25.32	55.13	3.58	0	7.54	8.43
6059063808	25.70	50.33	50-55%	Orange	6052	11.6	82.42	5.98	76.9	17.68	0.15	0.36	4.05	0.86
6059063902	24.34	47.45	45-50%	Orange	6745	7.01	86.43	6.55	22.98	55.52	2.8	0	15.79	2.91
6059063903	22.20	42.56	40-45%	Orange	4019	12.94	73.92	13.14	34.78	39.74	0.77	1.47	22.62	0.62
6059063904	28.07	55.14	55-60%	Orange	4492	13.6	74.09	12.31	43.92	37.24	1.07	0.38	14.91	2.47
6059063905	8.87	10.36	10-15%	Orange	4254	8.27	75.04	16.69	12.08	72.71	1.41	0	7.29	6.51
6059063906	25.34	49.56	45-50%	Orange	6334	12.19	82	5.81	50.14	38.68	0.98	0	7.61	2.59
6059063907	17.95	32.54	30-35%	Orange	8311	7.14	83.18	9.69	23.88	39.92	6.68	0.28	27.72	1.52
6059063908	24.97	48.68	45-50%	Orange	5725	8	81.1	10.9	26.48	45.28	4.31	0.17	19.07	4.68
6059074003	48.50	86.16	85-90%	Orange	4230	13.52	81.21	5.27	62.41	20.83	3.07	0	12.58	1.11
6059074004	38.26	72.53	70-75%	Orange	7765	12.03	76.3	11.67	62.64	17.39	0.63	0.36	15.79	3.19
6059074005	40.31	75.50	75-80%	Orange	7903	13.53	75.4	11.07	74.84	10.48	0.85	0.3	13.34	0.19
6059074006	29.85	58.41	55-60%	Orange	5778	13.26	80.24	6.51	66.06	17.86	4.53	0.4	9.64	1.51
6059074102	31.30	61.18	60-65%	Orange	6631	12.2	76.17	11.63	80.3	8.38	0.24	0	9.97	1.1
6059074103	34.20	66.28	65-70%	Orange	5021	16.11	75.64	8.25	93.53	2.85	0	0.36	2.63	0.64

6059074106	40.40	75.69	**75-80%**	Orange	6719	14.35	78.79	6.86	71.31	17.79	1.35	0	8.84	0.71
6059074107	18.44	33.76	**30-35%**	Orange	6671	13.66	75.39	10.96	36.89	34.24	1.44	0	22.55	4.89
6059074108	45.04	82.03	**80-85%**	Orange	4939	11.78	78.6	9.62	85.85	5.55	1.03	0	7.57	0
6059074109	41.01	76.68	**75-80%**	Orange	3358	15.46	77.61	6.94	82.82	4.73	0.18	0	12.12	0.15
6059074110	28.82	56.62	**55-60%**	Orange	3910	7.72	75.7	16.57	40.26	23.94	2.35	0.87	27.95	4.63
6059074111	28.77	56.49	**55-60%**	Orange	5523	9.8	75.21	14.99	62.72	13.18	0.54	0	23.56	0
6059074200	44.26	81.18	**80-85%**	Orange	9608	12.36	79.37	8.26	95.42	3.35	0	0.07	1.16	0
6059074300	51.23	89.12	**85-90%**	Orange	4051	17.38	76.1	6.52	92.82	4.25	0	0	2.22	0.72
6059074403	43.81	80.56	**80-85%**	Orange	6240	20.14	76.84	3.01	93.72	3.13	0	0.43	2.72	0
6059074405	53.72	91.45	**90-95%**	Orange	6662	20.08	72.41	7.51	89.21	7.18	0.89	0	2.09	0.65
6059074406	55.01	92.54	**90-95%**	Orange	3693	15.14	79.88	4.98	91.39	4.39	0.79	0	2.38	1.06
6059074407	34.10	66.05	**65-70%**	Orange	5648	16.7	77.12	6.18	82.84	11.38	1.13	0	3.75	0.89
6059074408	38.64	73.10	**70-75%**	Orange	6300	21.41	73.89	4.7	79.92	10.25	3.43	0	3.57	2.83
6059074501	35.00	67.60	**65-70%**	Orange	7241	19.07	75.71	5.22	89.15	1.26	0.33	0.44	8.69	0.14
6059074502	50.05	87.93	**85-90%**	Orange	5413	15.02	76.21	8.78	92.89	2.44	0	0	4.67	0
6059074601	39.01	73.50	**70-75%**	Orange	7602	14.68	77.91	7.41	92.49	5.41	0	0	1.36	0.74
6059074602	45.09	82.14	**80-85%**	Orange	8382	14.02	79.42	6.56	93.27	3.07	0.12	0	2.18	1.37
6059074701	39.35	73.87	**70-75%**	Orange	8184	14.97	78.25	6.78	91.87	1.96	0.06	0	5.27	0.84
6059074702	37.32	71.10	**70-75%**	Orange	6078	13.29	80.55	6.15	92.51	2.48	0.21	0	3.9	0.89
6059074801	47.33	84.82	**80-85%**	Orange	5767	12.66	79.09	8.25	91.99	1.65	1.73	0	4.63	0
6059074802	40.45	75.76	**75-80%**	Orange	6772	18.53	76.73	4.74	86.13	0.92	0.52	0	12.43	0
6059074803	37.31	71.05	**70-75%**	Orange	9166	10.77	77.22	12.01	73.9	3.52	0.86	0	20.27	1.44
6059074805	41.31	77.09	**75-80%**	Orange	5288	23.39	73.01	3.59	92.93	0.78	1.82	0	1.53	2.95
6059074806	37.63	71.53	**70-75%**	Orange	5205	18.54	73.85	7.61	92.32	0.69	2.63	0	4.36	0
6059074901	49.88	87.73	**85-90%**	Orange	9933	19.14	73.16	7.7	94.94	1.16	0	0.1	3.8	0
6059074902	37.74	71.67	**70-75%**	Orange	6221	18.74	76.39	4.87	97.6	1.38	0.05	0	0.96	0
6059075002	51.89	89.90	**85-90%**	Orange	8236	15.86	72.81	11.33	87.31	6.76	0.17	0	5.5	0.25
6059075003	36.75	70.22	**70-75%**	Orange	7500	23	75.01	1.99	95.52	2.96	0.27	0	0.59	0.67
6059075004	45.46	82.53	**80-85%**	Orange	5267	19.18	76.34	4.48	93.87	3.3	2.01	0	0.82	0
6059075100	41.15	76.84	**75-80%**	Orange	9934	12.73	79.37	7.89	74.21	17.73	1.39	0.37	5.29	1.01
6059075201	46.86	84.23	**80-85%**	Orange	6089	15.27	74.18	10.54	90.43	4.02	0	1.45	4.11	0
6059075202	45.39	82.40	**80-85%**	Orange	5592	13.59	75.34	11.07	92.97	2.16	0.32	0.57	3.97	0
6059075301	25.84	50.72	**50-55%**	Orange	5751	12.62	77.83	9.55	61.8	17.3	1.17	0	19.01	0.73
6059075302	36.94	70.50	**70-75%**	Orange	5137	20.46	70.59	8.95	81.97	11.95	0.8	0	4.81	0.47
6059075303	31.06	60.78	**60-65%**	Orange	3372	12.07	66.73	21.2	44.13	43.77	0.53	0.27	7.62	3.68
6059075401	27.84	54.59	**50-55%**	Orange	4258	11.98	73.65	14.37	54.32	36.92	1.81	0	3.88	3.08
6059075403	37.41	71.23	**70-75%**	Orange	8105	10.64	81.06	8.3	63.45	24.97	1.11	0.27	9.4	0.79
6059075404	28.44	55.81	**55-60%**	Orange	7202	12	75.67	12.33	48.85	29.51	10.71	0.28	9.8	0.86
6059075405	26.65	52.37	**50-55%**	Orange	3448	12.15	71.4	16.44	57.02	34.11	0.93	0	5.83	2.12
6059075504	20.89	39.81	**35-40%**	Orange	3857	10.16	71.09	18.75	30.52	54.73	0.36	0.26	9.72	4.41
6059075505	20.77	39.44	**35-40%**	Orange	3355	13.23	70.76	16.01	39.91	44.86	3.01	0.27	9.68	2.27
6059075506	19.63	36.55	**35-40%**	Orange	3636	11.91	70.46	17.63	32.4	46.86	2.31	0	15.87	2.56
6059075507	23.75	46.09	**45-50%**	Orange	5257	11.19	81.89	6.92	47.97	30.3	3.39	0	15.07	3.27
6059075512	36.53	69.92	**65-70%**	Orange	3866	21.6	74.08	4.32	55.85	15.73	8.98	0	16.19	3.26
6059075513	27.02	53.06	**50-55%**	Orange	5200	11.79	79.71	8.5	56.92	17.13	1.52	0.4	19.19	4.83
6059075514	41.00	76.65	**75-80%**	Orange	4192	14.79	77.5	7.71	74.19	11.33	2.31	0	11.19	0.98
6059075515	33.17	64.42	**60-65%**	Orange	21127	13.84	79.48	6.67	28.39	27.32	1.64	0	39.93	2.72
6059075603	7.09	6.92	**5-10%**	Orange	4120	11.6	71.89	16.5	19.71	70.02	0.12	1.6	7.74	0.8
6059075604	10.62	14.46	**10-15%**	Orange	7867	8.57	66.33	25.1	11.27	69.71	0	0	16.89	2.12
6059075605	8.56	9.75	**5-10%**	Orange	6113	12.11	73.68	14.22	10.89	63.83	2.01	0.47	16.49	6.3
6059075606	4.75	2.63	**1-5% (lowest scores)**	Orange	5911	6.43	69.65	23.92	13.42	66.62	0	0	18.52	1.44
6059075607	6.48	5.71	**5-10%**	Orange	6381	10.16	77.34	12.51	13.52	47.06	0.14	0	36.23	3.04
6059075701	17.88	32.44	**30-35%**	Orange	7155	13	74.63	12.37	46.14	40.35	0.96	1.37	8.36	2.82
6059075702	7.47	7.58	**5-10%**	Orange	3809	10.03	70.62	19.35	17.04	68.08	0	0.32	11.82	2.76
6059075703	8.36	9.30	**5-10%**	Orange	4508	12.47	68.72	18.81	19.3	63.84	0.84	0.38	10.94	4.7
6059075805	25.90	50.79	**50-55%**	Orange	4147	13.82	76.18	10.01	46.66	49.48	0.36	0.27	2.31	0.92
6059075806	25.72	50.38	**50-55%**	Orange	6273	13.76	70.54	15.7	45.11	48.14	1.1	0	4.82	0.83
6059075807	20.49	38.77	**35-40%**	Orange	4163	10.28	78.84	10.88	43.55	50.85	0.24	0.36	4.59	0.41

6059075808	7.14	7.03	5-10%	Orange	3300	12.3	66.52	21.18	20	71.85	0	0.24	5.39	2.52
6059075809	6.08	4.85	1-5% (lowest scores)	Orange	2822	6.34	65.02	28.63	12.65	70.45	0.39	0	13.86	2.66
6059075810	5.99	4.60	1-5% (lowest scores)	Orange	3028	7.03	63.64	29.33	13.01	64.53	0.53	0	19.68	2.25
6059075811	32.32	63.00	60-65%	Orange	3344	15.55	75.93	8.52	55.35	31.16	0.15	0	11.66	1.67
6059075812	25.32	49.50	45-50%	Orange	6477	16.49	71.81	11.7	49.08	42.33	0.22	0	6.72	1.65
6059075813	15.18	25.96	25-30%	Orange	5060	7.79	75	17.21	23.74	53.62	1.84	0	16.19	4.62
6059075814	9.49	11.69	10-15%	Orange	2915	10.05	73.1	16.84	15.78	47.07	1.72	0	30.7	4.73
6059075815	18.95	34.98	30-35%	Orange	5545	13.2	74.7	12.1	42.74	44.96	6.2	0	4.43	1.66
6059075816	27.51	53.96	50-55%	Orange	3630	14.77	74.93	10.3	43.97	38.24	3.86	0.39	10.91	2.64
6059075901	22.22	42.59	40-45%	Orange	4011	9.05	81.48	9.47	37.52	51.78	0.42	0	7.51	2.77
6059075902	23.32	45.21	45-50%	Orange	7308	10.21	78.78	11.02	43.27	47.41	1.83	0.25	6.16	1.08
6059076000	36.57	69.98	65-70%	Orange	9150	11.67	76.95	11.38	54	30.46	2.17	0	12.71	0.66
6059076101	31.52	61.54	60-65%	Orange	9594	11.61	80.41	7.97	37.94	38.11	3.94	0	15.51	4.5
6059076102	33.35	64.66	60-65%	Orange	8492	6.79	84.21	9	50.66	26.11	5.91	0.38	15.16	1.79
6059076103	30.22	59.14	55-60%	Orange	9563	13.46	76.33	10.22	63.47	12.69	1.53	0	22.14	0.17
6059076201	19.87	37.19	35-40%	Orange	7619	15.61	74.03	10.37	29.31	44.39	1.19	0	23.97	1.14
6059076202	25.62	50.18	50-55%	Orange	6159	15.64	72.56	11.8	46	42.62	2.31	0.5	6.95	1.62
6059076204	40.73	76.24	75-80%	Orange	4639	18.69	76.61	4.7	79.8	9.48	0.8	2.22	6.4	1.29
6059076205	22.84	44.02	40-45%	Orange	7424	7.18	85.78	7.04	38.2	45.08	0.94	1.01	10.43	4.34
6059076206	18.94	34.96	30-35%	Orange	4692	11.51	72.66	15.84	37.62	54.07	0.19	0	5.97	2.15
6059076208	31.74	61.94	60-65%	Orange	5412	8.04	77.24	14.73	34.81	49.7	1.24	0	12.22	2.03
6059086301	42.36	78.53	75-80%	Orange	7075	13.44	76.04	10.52	71.36	15.66	1.81	0	10.75	0.41
6059086303	27.14	53.32	50-55%	Orange	7535	8.03	80.86	11.11	26.29	31.11	1.67	0	38.55	2.38
6059086304	37.80	71.76	70-75%	Orange	4864	15.28	75.7	9.03	53.7	29.75	1.99	0	12.79	1.77
6059086305	32.88	63.80	60-65%	Orange	4266	8.35	74.26	17.39	45.17	32.54	1.03	0	21.1	0.16
6059086306	39.09	73.61	70-75%	Orange	4773	23.86	63.96	12.17	58.87	20.47	1.45	0.61	13.68	4.92
6059086402	42.85	79.25	75-80%	Orange	6071	16.74	73.86	9.41	71.45	16.06	0.35	0.16	10.79	1.19
6059086404	49.94	87.80	85-90%	Orange	6350	13.48	78.13	8.39	82.06	8.98	0.16	0	8.02	0.79
6059086405	37.05	70.69	70-75%	Orange	7658	14.18	77.85	7.97	76.42	11.9	1.33	0	9.75	0.6
6059086406	45.77	82.98	80-85%	Orange	4189	16.14	76.27	7.59	62.19	19.38	3.63	0	11.48	3.32
6059086407	49.72	87.57	85-90%	Orange	6379	13.67	77.77	8.56	66.41	19.47	0.41	0.3	11.94	1.47
6059086501	48.77	86.46	85-90%	Orange	4254	15.26	76.92	7.83	79.55	17.58	0.49	0	1.55	0.82
6059086502	61.40	96.36	95-100% (highest scores)	Orange	6318	18.88	77.24	3.88	94.38	4.34	0.19	0	0.7	0.4
6059086601	51.65	89.61	85-90%	Orange	9185	15.59	78.18	6.23	81.68	7.21	3.21	0	7.11	0.79
6059086602	40.10	75.10	75-80%	Orange	6447	15.25	76.66	8.1	66.91	17.43	2.11	0	11.28	2.26
6059086701	43.85	80.61	80-85%	Orange	9054	11.77	73.12	15.11	52.31	17.96	0.61	0	28.22	0.91
6059086702	62.78	97.00	95-100% (highest scores)	Orange	8069	16.05	79.46	4.49	70.55	13	3.06	1.55	9.74	2.09
6059086801	31.32	61.21	60-65%	Orange	3878	15.16	70.01	14.83	42.11	26.74	3.51	0	24.66	2.99
6059086802	53.91	91.57	90-95%	Orange	5874	12.96	75.03	12.02	57.59	17.89	2.93	0	20.69	0.9
6059086803	42.17	78.27	75-80%	Orange	8751	9.78	74.32	15.9	41.52	26.39	3.47	0	27.18	1.45
6059086901	39.60	74.28	70-75%	Orange	8270	11.34	72.81	15.85	51.45	17.78	2.91	0	25.4	2.45
6059086902	28.53	55.93	55-60%	Orange	5624	7.08	67.05	25.87	30.67	33.13	3.88	0	30.76	1.56
6059086903	34.82	67.28	65-70%	Orange	7128	16.39	75.04	8.57	56.21	17.69	8.32	0	17.04	0.73
6059087001	30.81	60.31	60-65%	Orange	5272	11.82	77.12	11.06	51.27	14.62	10.19	0	20.56	3.36
6059087002	32.36	63.11	60-65%	Orange	7887	11.03	77.63	11.34	47.04	22.84	4.59	0.38	23.4	1.76
6059087101	28.96	56.85	55-60%	Orange	4741	12.53	76.76	10.72	41.76	25.29	4.98	0	26.62	1.35
6059087102	49.82	87.64	85-90%	Orange	7084	18.07	77.85	4.08	66.36	12.11	6.75	2.08	10.88	1.82
6059087103	35.08	67.70	65-70%	Orange	8986	10.75	78.96	10.29	43.45	23.88	2.19	0.11	29.62	0.76
6059087105	43.91	80.70	80-85%	Orange	4614	12.07	72.15	15.78	50.13	23.8	0.52	0	23.45	2.1
6059087106	41.01	76.66	75-80%	Orange	4819	13.9	64.72	21.37	66.78	18.49	2.32	0	11.85	0.56
6059087200	40.50	75.87	75-80%	Orange	7725	12.22	76.31	11.47	61.15	24.71	3.26	0	9.97	0.91
6059087300	48.25	85.82	85-90%	Orange	10714	14	79.77	6.23	71.92	14.8	0.92	0	11.14	1.2
6059087401	45.95	83.18	80-85%	Orange	4946	15.63	76.93	7.44	46.4	21.25	1.56	0.02	27.74	3.03
6059087403	56.78	93.77	90-95%	Orange	3701	15.35	79.82	4.84	87.33	7.38	0.19	0	4.52	0.59
6059087404	47.80	85.25	85-90%	Orange	3891	16.37	77.82	5.81	90.39	5.83	0.8	0	2.98	0
6059087405	63.76	97.39	95-100% (highest scores)	Orange	5627	17.72	76.84	5.44	85.8	9.01	0.85	0	4.34	0
6059087503	36.09	69.33	65-70%	Orange	6011	13.71	73.2	13.09	63.78	20.4	1.18	0	12.64	2
6059087504	48.83	86.56	85-90%	Orange	7286	16.94	74.91	8.15	85.23	3.88	0.54	0.54	9.4	0.41

6059087505	36.66	70.07	**70-75%**	Orange	4913	13.21	77.75	9.04	66.58	14.98	2.36	0	12.15	3.93
6059087601	34.68	67.06	**65-70%**	Orange	5348	15.41	72.51	12.08	55.2	22.87	0.99	0	19.04	1.91
6059087602	33.40	64.79	**60-65%**	Orange	8007	13.68	72.97	13.35	58.95	16.59	5.08	0	18.06	1.32
6059087701	27.84	54.58	**50-55%**	Orange	5901	9.41	73.92	16.68	39.98	26	2.71	0	28.37	2.95
6059087703	33.94	65.72	**65-70%**	Orange	6222	10.56	79.48	9.96	51.46	18.84	0.88	0.19	27.6	1.03
6059087704	24.68	48.12	**45-50%**	Orange	5411	11.62	77.14	11.24	37.55	25.49	1.52	0.41	30.72	4.32
6059087801	37.61	71.48	**70-75%**	Orange	5195	12.57	75.57	11.86	48.87	21.46	2.69	0	25.24	1.73
6059087802	37.25	70.90	**70-75%**	Orange	7163	11.52	74.13	14.35	45.96	20.03	0.7	0	31.66	1.65
6059087803	54.29	91.89	**90-95%**	Orange	5902	18.94	72.33	8.73	58.25	7.91	0.95	0	30.85	2.03
6059087805	38.09	72.29	**70-75%**	Orange	7494	15.41	77.72	6.87	55.22	17.49	5.04	0	21.13	1.12
6059087806	39.68	74.45	**70-75%**	Orange	6654	16.95	71.12	11.93	65.51	14.02	1.64	0	14.29	4.54
6059087901	50.18	88.05	**85-90%**	Orange	4030	9.73	74.67	15.61	32.7	17.34	0.74	0	47.42	1.79
6059087902	40.23	75.35	**75-80%**	Orange	5408	16.12	69.06	14.81	49.39	7.1	0.83	3.29	38.65	0.74
6059088001	31.81	62.07	**60-65%**	Orange	4527	8.7	76.94	14.36	22.66	20.28	0.62	0	52.16	4.29
6059088002	24.25	47.26	**45-50%**	Orange	4157	6.86	76.35	16.79	26.65	22.06	0	0	50.78	0.51
6059088101	50.66	88.54	**85-90%**	Orange	2285	10.94	77.07	11.99	38.51	30.59	7.22	0	18.38	5.3
6059088104	31.86	62.13	**60-65%**	Orange	4743	13.64	68.92	17.44	42.91	23.45	1.14	2.38	28.59	1.54
6059088105	24.69	48.15	**45-50%**	Orange	4793	10.62	73.52	15.86	34.36	17.48	1	0	44.96	2.19
6059088106	32.22	62.78	**60-65%**	Orange	5008	9.7	76.9	13.4	36.34	18.89	0.5	0	43.01	1.26
6059088107	25.29	49.43	**45-50%**	Orange	5977	7.43	75.89	16.68	21.13	14.3	0.05	0.1	63.21	1.2
6059088201	27.07	53.21	**50-55%**	Orange	4082	14.4	75.31	10.29	43.85	22.91	1	0	32.07	0.17
6059088202	20.44	38.51	**35-40%**	Orange	3286	7.94	74.71	17.35	26.6	33.29	2.98	0	35.42	1.7
6059088203	26.55	52.09	**50-55%**	Orange	5530	13.91	73	13.09	31.23	17.78	0	3.47	45.46	2.06
6059088301	32.16	62.71	**60-65%**	Orange	6566	9.72	74.05	16.24	44.64	20.36	0.11	0	34.44	0.46
6059088302	24.58	47.91	**45-50%**	Orange	6040	10.1	75.22	14.69	25.94	29.29	0.96	0.26	42.77	0.78
6059088401	29.76	58.21	**55-60%**	Orange	5393	6.81	74.93	18.26	42.41	20.73	1.04	0.24	33.56	2.02
6059088402	39.80	74.67	**70-75%**	Orange	4700	13.49	73.85	12.66	47.02	18.83	0.21	0	32.38	1.55
6059088403	30.49	59.63	**55-60%**	Orange	6923	11.83	80.3	7.87	51.81	15.9	1.03	0	29.9	1.36
6059088501	36.00	69.14	**65-70%**	Orange	6883	15.95	73.28	10.77	52.27	13.45	0.41	0.1	31.62	2.15
6059088502	32.37	63.12	**60-65%**	Orange	5598	14.65	68.4	16.95	61.15	9.99	0	0	27.67	1.2
6059088601	37.79	71.73	**70-75%**	Orange	6742	6.24	78.63	15.13	31.12	20.47	0.22	0	45.55	2.64
6059088602	39.81	74.70	**70-75%**	Orange	4488	12.63	74.51	12.86	36.92	20.14	0.94	0.89	39.75	1.36
6059088701	24.95	48.63	**45-50%**	Orange	5935	12.82	74.42	12.75	33.36	11.2	1.16	0	52.49	1.79
6059088702	32.40	63.19	**60-65%**	Orange	6243	11.52	77.09	11.39	33.67	9.48	0.98	0.29	53.8	1.78
6059088801	38.59	73.02	**70-75%**	Orange	7689	9.75	76.26	13.98	21.16	15.61	4.68	0.47	55.89	2.2
6059088802	40.92	76.50	**75-80%**	Orange	4984	7.1	77.27	15.63	28.67	13.76	0.04	0	55.28	2.25
6059088901	28.80	56.57	**55-60%**	Orange	7018	8.06	73.74	18.2	10.44	12.5	1.48	0.36	72.84	2.38
6059088902	41.59	77.45	**75-80%**	Orange	5019	10.3	74.92	14.78	32.06	4.02	0.2	1.49	61.67	0.56
6059088903	38.00	72.16	**70-75%**	Orange	8826	10.13	76.27	13.6	27.99	8.77	0	0	61.6	1.64
6059088904	26.80	52.62	**50-55%**	Orange	5684	9.17	73.77	17.07	6.93	13.14	0	0	79.19	0.74
6059088905	30.27	59.24	**55-60%**	Orange	4657	8.4	65.66	25.94	7.04	8.85	3.31	0	80.05	0.75
6059089001	43.33	79.95	**75-80%**	Orange	7077	11.16	75.81	13.03	37.15	3.15	0	0	59.21	0.49
6059089003	51.62	89.55	**85-90%**	Orange	3856	15.46	78.5	6.04	58.09	3.16	0.41	0.52	37.27	0.54
6059089004	45.16	82.20	**80-85%**	Orange	6883	12.96	72.67	14.37	50.3	6.51	0	0	42.1	1.09
6059089102	36.04	69.20	**65-70%**	Orange	6686	8.76	76.86	14.37	51.06	15.57	1.27	0.15	31.21	0.73
6059089104	36.03	69.19	**65-70%**	Orange	6434	19.86	73.3	6.84	80.6	2.55	0.59	0.23	15.9	0.12
6059089105	43.86	80.62	**80-85%**	Orange	6889	15.47	77.6	6.92	90.38	1.47	0	0	8.16	0
6059089106	46.32	83.65	**80-85%**	Orange	4226	13.75	74.14	12.12	72.46	7.81	0.09	0	19.19	0.45
6059089107	29.91	58.48	**55-60%**	Orange	5664	9.27	78.87	11.86	48.36	12.04	0	0	39.11	0.49
6059099202	30.50	59.66	**55-60%**	Orange	8826	15.08	73.96	10.96	53.44	8.7	0.48	0	34.78	2.59
6059099203	25.21	49.19	**45-50%**	Orange	6215	10.78	73.79	15.43	25.47	12.79	0.23	0	59.74	1.77
6059099204	28.46	55.84	**55-60%**	Orange	4582	4.74	76.15	19.12	13.33	13.73	2.25	0	67.37	3.32
6059099212	24.56	47.89	**45-50%**	Orange	5524	10.57	75.45	13.98	33.36	41.06	1.96	0.81	15.45	7.35
6059099214	16.71	29.65	**25-30%**	Orange	3825	8.5	67.61	23.9	12.6	69.62	0.34	0	14.54	2.9
6059099215	17.21	30.80	**30-35%**	Orange	5074	10.88	75.94	13.18	25.5	52.5	0.85	0.97	14.06	6.13
6059099216	13.99	23.03	**20-25%**	Orange	4658	11.74	72.65	15.61	19.54	59.73	0.71	0	16.85	3.18
6059099217	11.05	15.57	**15-20%**	Orange	2454	10.39	70.09	19.52	8.8	76.69	1.79	0	9.9	2.81
6059099220	16.11	28.19	**25-30%**	Orange	5770	8.42	76.1	15.48	9.83	71.94	3.59	0.76	9.41	4.47

6059099222	26.67	52.40	50-55%	Orange	5346	14.91	66.69	18.41	16.65	17.71	0.41	0.21	62.5	2.53
6059099223	29.00	56.92	55-60%	Orange	5095	6.59	74.6	18.8	14.41	21.77	0	1.35	60.83	1.65
6059099224	23.76	46.10	45-50%	Orange	3448	8.27	73	18.74	9.31	45.82	0.32	0	41.65	2.9
6059099225	14.92	25.35	25-30%	Orange	3554	9	73.04	17.95	8.72	45.64	0.39	0	41.59	3.66
6059099226	27.66	54.25	50-55%	Orange	3772	7.26	70.73	22	10.52	27.2	0	0.24	62.04	0
6059099227	27.80	54.51	50-55%	Orange	5806	14.92	71.15	13.93	30.4	25.73	0.5	0.64	40.56	2.17
6059099229	30.37	59.38	55-60%	Orange	6176	12.55	63.83	23.62	17.76	48.82	0.5	0	27.64	5.28
6059099230	22.33	42.86	40-45%	Orange	4717	12	72.25	15.75	15.58	56.22	0.28	0	23.49	4.43
6059099231	8.53	9.67	5-10%	Orange	5431	10.77	66.93	22.3	14.66	56.79	0.96	0	24.19	3.41
6059099232	20.63	39.15	35-40%	Orange	5557	7.68	70.74	21.58	10.46	54.78	0.36	0	28.43	5.97
6059099233	16.95	30.36	30-35%	Orange	3074	6.15	65.19	28.66	9.11	52.37	0.98	0	36.24	1.3
6059099234	24.08	46.89	45-50%	Orange	3499	5.32	67.68	27.01	7.12	51.1	0	0	39.3	2.49
6059099235	13.98	22.96	20-25%	Orange	5123	9.37	71.62	19.01	24.79	59.59	1.93	0.43	9.92	3.34
6059099237	12.02	18.03	15-20%	Orange	3198	9.76	68.32	21.92	9.26	73.58	1.03	0	11.69	4.44
6059099238	7.95	8.38	5-10%	Orange	3974	7.62	69.58	22.8	11.42	72.07	0.53	0.33	13.19	2.47
6059099239	13.38	21.39	20-25%	Orange	3824	7.09	70.84	22.07	6.88	73.93	0.18	0	16.19	2.82
6059099240	9.72	12.27	10-15%	Orange	5275	7.05	74.18	18.77	17.04	67.01	1.78	0	10.24	3.92
6059099241	23.75	46.07	45-50%	Orange	4202	8.61	77.06	14.33	25.75	41.77	2.97	0.19	23.68	5.64
6059099242	25.92	50.81	50-55%	Orange	3647	9.4	77.63	12.97	27.97	46.97	2.33	0.77	17.79	4.17
6059099243	14.07	23.23	20-25%	Orange	4034	9.89	71.42	18.69	8.06	71.32	2.83	0	10.11	7.68
6059099244	11.54	16.68	15-20%	Orange	3528	9.67	44.67	45.66	9.3	81.72	0	0	7.26	1.73
6059099245	13.82	22.52	20-25%	Orange	2948	10.04	69.37	20.59	13.53	70.56	0.34	0	12.89	2.68
6059099246	15.21	26.03	25-30%	Orange	3476	10.5	64.76	24.74	10.3	61.08	0.06	0.69	21.78	6.1
6059099247	27.93	54.82	50-55%	Orange	3330	11.5	74.02	14.47	42.49	7.33	0.84	0	47.99	1.35
6059099248	27.68	54.29	50-55%	Orange	5636	12.62	73.58	13.8	69.36	5.07	0	0.25	25.12	0.2
6059099249	35.90	68.99	65-70%	Orange	4356	18.43	78.44	3.12	85.15	0.64	0.87	0	12.95	0.39
6059099250	30.36	59.35	55-60%	Orange	3046	8.83	72	19.17	31.39	32.4	2.13	0	32.37	1.71
6059099251	25.48	49.81	45-50%	Orange	5767	14.01	74.77	11.22	23.1	39.07	0.03	0.31	30.5	6.99
6059099305	19.95	37.43	35-40%	Orange	7490	9.61	78.57	11.82	26.74	58.24	0.59	0	7.22	7.21
6059099306	15.61	26.90	25-30%	Orange	5909	11.12	79.56	9.32	13.17	74.31	1.52	0	7.62	3.38
6059099307	14.04	23.16	20-25%	Orange	2557	6.22	73.88	19.91	10.48	74.5	0	0	13.18	1.84
6059099308	9.33	11.25	10-15%	Orange	5996	10.61	67.06	22.33	13.79	62.36	0.43	0	21.05	2.37
6059099309	13.69	22.18	20-25%	Orange	5072	7.57	67.53	24.9	17.45	70.45	1.62	0.35	7.1	3.04
6059099310	10.67	14.61	10-15%	Orange	4057	5.94	80.63	13.43	8.65	78.75	0	0	10.3	2.29
6059099311	9.17	11.02	10-15%	Orange	3425	8.47	77.11	14.42	15.01	79.09	0.32	0.67	1.4	3.5
6059099402	38.92	73.34	70-75%	Orange	8190	19.52	72.16	8.32	66.14	20.35	0.42	3.99	7.7	1.39
6059099404	15.35	26.31	25-30%	Orange	4420	7.92	71.92	20.16	13.44	68.82	3.01	0.61	8.13	6
6059099405	18.18	33.14	30-35%	Orange	4335	14.6	72.55	12.85	20.72	58.15	3.74	0	12.94	4.45
6059099406	20.74	39.35	35-40%	Orange	4779	10.44	73.15	16.41	11.86	65.62	3.72	0.61	12.64	5.55
6059099407	12.74	19.74	15-20%	Orange	2380	6.09	72.18	21.72	19.03	63.99	0.55	0	12.14	4.29
6059099408	19.01	35.21	35-40%	Orange	4594	10.12	73.47	16.41	13.91	66.67	1.94	0	12.71	4.77
6059099410	33.71	65.33	65-70%	Orange	4903	8.34	80.71	10.95	41	39.1	1.84	0	15.01	3.06
6059099411	32.98	64.04	60-65%	Orange	5851	8.1	84.58	7.31	45.98	39.98	2.44	0.19	7.89	3.52
6059099412	20.54	38.88	35-40%	Orange	4875	12.68	68.23	19.1	21.72	62.38	1.11	0.21	12.06	2.52
6059099413	29.52	57.89	55-60%	Orange	8633	11.79	67.18	21.02	18.42	58.93	0.41	0.27	19.19	2.79
6059099415	9.25	11.11	10-15%	Orange	5338	9.37	66.75	23.89	10.25	73.74	0.56	0.92	11.92	2.62
6059099416	13.53	21.79	20-25%	Orange	5536	10.08	79.34	10.59	20.63	63.37	1.19	0	8.76	6.05
6059099417	17.20	30.76	30-35%	Orange	4845	11.46	73.75	14.8	13.54	65.84	1.44	0.5	14.4	4.27
6059099502	25.67	50.28	50-55%	Orange	621	31.24	66.18	2.58	43.32	29.79	17.39	0	2.09	7.41
6059099504	14.07	23.22	20-25%	Orange	2679	9.44	65.99	24.56	8.21	76.6	0	0.41	7.99	6.79
6059099506	6.85	6.51	5-10%	Orange	919	5.88	73.34	20.78	7.51	84.77	0.65	1.41	4.46	1.2
6059099508	22.08	42.31	40-45%	Orange	5116	12.43	70.02	17.55	20.35	57.8	1.17	0.27	13.68	6.72
6059099509	20.73	39.33	35-40%	Orange	3352	0	18.29	81.71	7.34	70.35	1.82	1.4	19.09	0
6059099510	20.03	37.63	35-40%	Orange	4449	0	19.15	80.85	6.72	71.99	2.09	0	17.38	1.82
6059099511	10.53	14.23	10-15%	Orange	3023	6.98	75.95	17.07	15.48	79.69	0.96	0	1.69	2.18
6059099512	13.34	21.36	20-25%	Orange	2959	4.09	76.92	18.99	13.42	77.56	0.74	0	3.21	5.07
6059099513	15.94	27.67	25-30%	Orange	2106	6.6	63.2	30.2	17.43	70.42	1.28	0	8.17	2.71
6059099514	9.76	12.36	10-15%	Orange	4897	2.23	65.57	32.2	9.78	64.92	0	0	20.34	4.96

6059099601	51.94	89.96	85-90%	Orange	7230	15.23	72.53	12.24	36.57	18.28	0.65	0.29	43.32	0.89
6059099602	22.62	43.53	40-45%	Orange	3275	10.02	77.44	12.55	23.05	53.4	1.74	0	17.87	3.94
6059099603	23.71	45.95	45-50%	Orange	7113	10.88	69.38	19.74	19.04	55.69	0.07	0	18.07	7.14
6059099604	12.20	18.44	15-20%	Orange	3874	13.42	69.82	16.75	19.08	59.89	1.32	0.15	14.66	4.9
6059099605	22.08	42.35	40-45%	Orange	4951	9.39	76.23	14.38	17.19	59.58	1.96	0	15.05	6.22
6059099701	34.97	67.49	65-70%	Orange	6441	8.03	75.31	16.66	23.61	12.7	0	0	61.27	2.42
6059099702	40.11	75.11	75-80%	Orange	7897	10.75	72.2	17.04	19.97	23.52	0.98	0	54.5	1.04
6059099703	29.13	57.11	55-60%	Orange	6157	8.3	73.41	18.29	14.8	35.94	1.1	0	43.59	4.56
6059099801	40.16	75.25	75-80%	Orange	5742	8.88	75.48	15.64	35.14	15.55	1.22	0.77	46.9	0.42
6059099802	50.74	88.60	85-90%	Orange	5472	7.93	71.64	20.43	42.82	12.79	1.21	0	41.94	1.24
6059099803	37.48	71.36	70-75%	Orange	5697	9.81	71.9	18.29	17.8	16.04	0.14	0.98	63.86	1.18
6059099902	30.46	59.56	55-60%	Orange	4299	11	76.86	12.14	30.01	40.27	1.58	0	24.75	3.4
6059099903	35.76	68.78	65-70%	Orange	5764	13.24	74.91	11.85	40.96	21.15	1.08	0	34.56	2.26
6059099904	45.08	82.11	80-85%	Orange	6116	14.58	72.55	12.87	34.88	17.38	1.1	0	42.12	4.53
6059099905	26.63	52.28	50-55%	Orange	4265	12.8	77.49	9.71	43.94	27.53	1.03	0	23.12	4.38
6059099906	22.09	42.36	40-45%	Orange	5270	14.21	66.96	18.82	20.99	50.8	6.76	0	19.15	2.31
6059110001	22.84	44.04	40-45%	Orange	4691	12.24	72.61	15.16	17.54	59.24	4.5	0	10.53	8.19
6059110003	23.89	46.48	45-50%	Orange	3141	18.72	63.55	17.73	13.88	66.06	1.11	0.48	17.64	0.83
6059110004	14.23	23.61	20-25%	Orange	4953	11.77	69.25	18.98	16.37	63.05	0.46	0	16.74	3.37
6059110005	16.13	28.24	25-30%	Orange	2981	9.33	68.2	22.48	18.45	58.91	0	0	18.79	3.86
6059110006	19.72	36.80	35-40%	Orange	3248	13.02	68.57	18.41	15.12	63.64	0	0	15.12	6.13
6059110007	25.65	50.25	50-55%	Orange	5148	12.94	66.39	20.67	13.95	70.49	2.27	0	10.72	2.56
6059110008	16.51	29.11	25-30%	Orange	4486	9.63	72.56	17.81	14.38	65.38	2.1	0.98	11.35	5.82
6059110010	17.35	31.20	30-35%	Orange	4801	11.41	70.69	17.89	17.41	47.18	0.35	0.37	32.22	2.46
6059110011	25.54	49.97	45-50%	Orange	2799	14.43	62.95	22.62	19.22	42.05	2.04	0.14	31.47	5.07
6059110012	15.36	26.34	25-30%	Orange	5131	12.61	63.48	23.91	15.92	64.31	1.54	0	15.47	2.75
6059110014	27.69	54.31	50-55%	Orange	5274	13.5	75.92	10.58	33.83	36.95	8.04	0.09	15.87	5.21
6059110015	16.40	28.82	25-30%	Orange	3354	8.56	70.72	20.72	18.55	67.17	1.49	0	8.02	4.77
6059110102	15.96	27.70	25-30%	Orange	5785	8.57	74.87	16.56	16.61	27.69	3.63	0.19	47.78	4.1
6059110104	19.83	37.04	35-40%	Orange	5631	9.96	73.43	16.6	17.26	37.19	2.75	0.3	37.15	5.35
6059110106	22.74	43.89	40-45%	Orange	3670	12.4	74.47	13.13	18.15	43.51	2.21	0	28.94	7.19
6059110108	23.66	45.76	45-50%	Orange	2677	8.33	73.25	18.42	24.58	42.66	7.28	0	18.45	7.02
6059110109	17.53	31.63	30-35%	Orange	5410	7.12	78.08	14.81	17.25	31.89	9.76	0	37.36	3.75
6059110110	28.10	55.19	55-60%	Orange	5809	11.93	75.83	12.24	33.88	28.28	2.24	0	31.49	4.11
6059110111	27.21	53.47	50-55%	Orange	6189	10.65	75.8	13.56	22.38	29.04	6.29	0	39.44	2.86
6059110113	22.91	44.25	40-45%	Orange	2110	6.11	73.22	20.66	21.94	49.38	1.94	1.04	20.09	5.59
6059110114	18.95	35.00	30-35%	Orange	4827	10.69	74.48	14.83	23.35	49.99	0.75	0.39	20.86	4.66
6059110115	20.62	39.12	35-40%	Orange	3993	7.71	74.53	17.76	25.67	20.16	6.06	0.3	47.26	0.55
6059110116	22.50	43.24	40-45%	Orange	4698	9.75	71.5	18.75	16.35	22.24	5.51	0	50.42	5.47
6059110117	20.81	39.59	35-40%	Orange	6393	12.12	72.92	14.95	19.4	35.07	2.91	0	39.21	3.41
6059110118	15.97	27.75	25-30%	Orange	2355	8.62	76.9	14.48	6.75	25.14	5.52	0	61.91	0.68
6059110201	35.38	68.12	65-70%	Orange	8236	11.16	69.74	19.1	31.23	23.93	4.06	0	37.25	3.53
6059110202	27.03	53.11	50-55%	Orange	8018	14.79	69.49	15.71	39.22	26.15	3.08	1.17	26.74	3.63
6059110203	19.65	36.65	35-40%	Orange	5512	12.63	74.29	13.08	26.02	48.31	1.6	0	19.32	4.75
6059110301	28.02	55.01	55-60%	Orange	6980	7.12	78.31	14.57	24.79	30.43	3.78	0	34.72	6.29
6059110302	36.96	70.52	70-75%	Orange	5975	9.44	77.24	13.32	50.63	22.14	0.08	0.87	24.41	1.87
6059110303	20.01	37.56	35-40%	Orange	4661	9.74	74.06	16.2	30.79	34.5	1.46	0.3	29.11	3.84
6059110304	25.99	50.95	50-55%	Orange	4966	10.41	74.69	14.9	27	38.99	2.68	0	30.65	0.68
6059110401	28.09	55.17	55-60%	Orange	4906	13.58	74.09	12.33	42.76	25.97	2.34	0	25.3	3.63
6059110402	43.12	79.68	75-80%	Orange	5588	14.17	72.28	13.55	54.92	14.37	4.47	0	24.33	1.9
6059110500	60.66	96.10	95-100% (highest scores)	Orange	8677	12.73	75.31	11.95	53.79	12.82	6.03	0.55	26.7	0.12
6059110603	54.66	92.26	90-95%	Orange	8669	14.47	77.85	7.68	60.32	17.04	0.98	0.21	20.52	0.93
6059110604	32.87	63.78	60-65%	Orange	7704	10.71	74.44	14.85	8.67	21.37	1.45	0	66.5	2.01
6059110605	20.58	39.03	35-40%	Orange	6740	14.07	70.89	15.04	9.45	18.87	0	0	68.97	2.7
6059110606	44.87	81.86	80-85%	Orange	4541	12.46	78.62	8.92	54.79	7.33	7.86	0	29.11	0.9
6059110607	32.96	63.96	60-65%	Orange	4254	12.81	76.7	10.48	33.71	20.85	3.57	1.13	38.58	2.16
6059980000	NA	NA	NA	Orange	33	0	100	0	81.82	0	0	0	18.18	0
6061020104	4.21	1.90	1-5% (lowest scores)	Placer	841	1.9	56.24	41.85	0	96.67	0	0	0	3.33

6061020105	2.91	0.64	1-5% (lowest scores)	Placer	1056	2.08	63.64	34.28	6.82	86.08	1.52	2.18	0	3.41
6061020106	9.84	12.48	10-15%	Placer	1277	10.34	74.71	14.96	17.31	81.91	0	0	0.78	0
6061020107	14.66	24.66	20-25%	Placer	2925	12.44	76.44	11.11	33.57	63.59	0	0	0.31	2.53
6061020200	10.07	13.10	10-15%	Placer	6903	11.86	66.09	22.05	11.82	85.77	0	0	1.27	1.13
6061020300	24.15	47.08	45-50%	Placer	4566	13.34	67.17	19.49	16.67	76.85	0	0	1.03	5.45
6061020401	22.36	42.95	40-45%	Placer	2173	9.39	70.92	19.7	12.52	79.11	1.1	0	2.49	4.79
6061020402	11.18	15.87	15-20%	Placer	3665	7.78	66.14	26.08	6.9	88.38	0.41	0.85	1.01	2.46
6061020501	10.10	13.17	10-15%	Placer	2979	10.57	64.79	24.64	5.17	83.69	0.13	0.44	4.97	5.61
6061020502	7.40	7.46	5-10%	Placer	4550	8.37	65.98	25.65	4.64	88.51	0.84	0	2.92	3.1
6061020601	6.05	4.77	1-5% (lowest scores)	Placer	7675	8.31	66.94	24.74	6.76	80.65	1.73	0	5.46	5.39
6061020602	10.71	14.66	10-15%	Placer	8759	13.24	67.93	18.83	6.11	82.14	0.86	0.78	4.88	5.23
6061020604	6.02	4.70	1-5% (lowest scores)	Placer	6704	13.02	71.2	15.78	10.34	74.4	6.32	0.48	3.09	5.37
6061020605	8.17	8.85	5-10%	Placer	6182	6.47	75.06	18.47	17.1	66.52	3.27	0	9.19	3.93
6061020606	2.27	0.37	1-5% (lowest scores)	Placer	4502	9.42	77.79	12.79	8.75	68.35	1.82	1.73	15.26	4.09
6061020710	4.87	2.85	1-5% (lowest scores)	Placer	4639	10.2	66.91	22.89	8.13	81.48	2	0	6.2	2.18
6061020711	10.48	14.03	10-15%	Placer	4072	10.66	70.28	19.06	11.59	79	1.33	0	6.09	1.99
6061020712	19.64	36.62	35-40%	Placer	3715	14.08	61.64	24.28	19.6	74.29	1.45	0	3.04	1.62
6061020713	20.27	38.15	35-40%	Placer	3196	12.58	57.51	29.91	16.83	71.59	4.47	0.41	3.94	2.75
6061020714	14.05	23.20	20-25%	Placer	4007	9.71	70.85	19.44	12.23	78.86	1.47	0.7	5.44	1.3
6061020715	7.75	8.07	5-10%	Placer	3096	10.24	73.06	16.7	20.83	69.51	0.03	0	6.98	2.65
6061020717	9.75	12.33	10-15%	Placer	4188	10.29	80.83	8.88	11.53	70.68	2.32	0	12.7	2.77
6061020805	24.44	47.71	45-50%	Placer	3856	10.45	76.35	13.2	21.21	62.91	5.11	0	6.77	3.99
6061020806	25.01	48.74	45-50%	Placer	3668	9.62	73.42	16.96	24.81	66.25	2.34	0	3.6	3
6061020901	33.44	64.86	60-65%	Placer	2467	10.74	76.57	12.69	42.97	49.45	0.36	0.32	1.38	5.51
6061020908	28.31	55.48	55-60%	Placer	6718	14.65	72.15	13.2	34.55	54.67	0	0.28	6.25	4.24
6061021003	27.39	53.73	50-55%	Placer	6764	12.6	73.12	14.28	17.93	69.5	1.94	0.59	6.12	3.92
6061021034	12.75	19.79	15-20%	Placer	4195	10.35	81.98	7.68	10.27	68.06	0.55	0	15.35	5.77
6061021035	7.58	7.85	5-10%	Placer	7748	10.25	79.56	10.2	13.86	68.56	1.29	0	12.62	3.67
6061021037	9.25	11.12	10-15%	Placer	1985	11.39	63.17	25.44	11.03	76.52	0.3	0	10.63	1.51
6061021038	12.21	18.48	15-20%	Placer	7389	12.69	78.58	8.73	17	70.27	1.3	1.34	6.32	3.78
6061021039	8.42	9.44	5-10%	Placer	1679	0	12.63	87.37	5.12	88.98	1.43	1.31	2.14	1.01
6061021040	10.41	13.83	10-15%	Placer	3132	0	16.92	83.08	4.89	85.06	0	0.38	6.8	2.87
6061021043	11.14	15.78	15-20%	Placer	3682	10.95	80.31	8.75	12.79	78.06	0	0	7.11	2.04
6061021044	5.63	3.98	1-5% (lowest scores)	Placer	5954	11.37	77.76	10.87	10.48	72.71	1.61	0.57	8.83	5.79
6061021045	20.48	38.68	35-40%	Placer	3107	12.87	73.13	14	18.47	71.45	4.8	0	2.06	3.22
6061021046	14.43	24.12	20-25%	Placer	5065	9.48	75.24	15.28	19.43	67.78	2.45	0.24	4.92	5.19
6061021103	20.68	39.27	35-40%	Placer	3783	12.27	75.28	12.45	16.2	71.19	1	0.13	6.24	5.23
6061021106	5.26	3.48	1-5% (lowest scores)	Placer	2363	9.82	68.18	22.01	11.3	79.18	0.59	0	4.36	4.57
6061021108	19.56	36.35	35-40%	Placer	3080	7.53	75.81	16.66	18.99	72.14	1.75	0.52	2.99	3.6
6061021109	13.50	21.70	20-25%	Placer	5634	11.22	74.58	14.2	10.17	78.56	1.38	0.12	7.74	2.02
6061021122	2.70	0.53	1-5% (lowest scores)	Placer	3300	8.39	64.88	26.73	8.12	81.21	1.3	0	5.91	3.45
6061021123	4.81	2.76	1-5% (lowest scores)	Placer	7297	8.87	71.28	19.86	5.69	84.25	1.59	0.96	4.32	3.19
6061021128	7.29	7.31	5-10%	Placer	2951	11.39	73.84	14.77	14.88	66.76	2.27	0.34	6.57	9.18
6061021129	21.08	40.14	40-45%	Placer	3352	12.26	75.57	12.17	15.42	71.24	2.03	0	5.94	5.37
6061021130	7.92	8.33	5-10%	Placer	2477	9.97	78.2	11.83	18.57	62.58	0	0	15.99	2.87
6061021131	7.61	7.92	5-10%	Placer	5526	10.44	74.74	14.82	13.7	71.86	2.68	0.36	4.85	6.55
6061021203	8.82	10.24	10-15%	Placer	7668	16.93	65.41	17.66	9.09	79.11	1.77	0	2.8	7.22
6061021204	7.57	7.84	5-10%	Placer	2546	8.37	65.44	26.2	13.83	83.27	0	1.3	0.67	0.94
6061021304	16.02	27.90	25-30%	Placer	6057	15.14	63.91	20.95	6.92	84.74	2.58	0	5.15	0.61
6061021309	4.78	2.71	1-5% (lowest scores)	Placer	14332	15.62	77.93	6.45	12.83	64.91	1.9	0.35	15.26	4.75
6061021322	16.55	29.22	25-30%	Placer	20899	17.91	68.02	14.06	14.52	55.98	2.69	0.08	22.82	3.9
6061021401	22.15	42.42	40-45%	Placer	2538	12.65	73.48	13.87	37.08	58.63	1.3	0	0.71	2.29
6061021403	13.96	22.89	20-25%	Placer	6909	17.46	70.98	11.56	50.62	41.4	0.61	0.43	2.56	4.39
6061021501	12.24	18.55	15-20%	Placer	5885	10.57	66.73	22.7	12.88	77.04	0.49	0.63	5.3	3.65
6061021502	14.67	24.71	20-25%	Placer	3668	7.36	71.02	21.62	9.38	80.45	0.3	0.41	1.74	7.72
6061021603	13.42	21.52	20-25%	Placer	4763	11.27	59.31	29.41	22.02	73.67	0.1	0.17	2.06	1.97
6061021604	5.81	4.32	1-5% (lowest scores)	Placer	3634	9.41	61.12	29.47	11.53	85.09	0.33	0.39	1.57	1.1
6061021801	12.63	19.48	15-20%	Placer	4965	6.99	63.5	29.51	8.14	88.88	0.08	0.18	1.29	1.43

6061021802	20.14	37.81	35-40%	Placer	6318	12.8	58.99	28.21	12.06	83.19	0.6	0	0.65	3.5
6061021901	6.60	5.93	5-10%	Placer	3350	3.85	76.18	19.97	9.25	81.28	2.09	3.22	0.6	3.55
6061021902	6.75	6.25	5-10%	Placer	4875	8.29	66.79	24.92	7.06	88.08	0.68	0.98	1.62	1.58
6061022002	9.34	11.26	10-15%	Placer	7188	9.36	69.5	21.13	12.74	79.35	1.39	1.92	0.6	3.99
6061022011	7.99	8.50	5-10%	Placer	1622	5.36	73.61	21.02	5.49	91	0	0	1.85	1.66
6061022013	17.28	31.04	30-35%	Placer	2932	4.6	74.05	21.35	5.46	91	0.14	0.89	1.57	0.95
6061022014	5.17	3.30	1-5% (lowest scores)	Placer	1318	9.86	78.53	11.61	7.59	90.67	0	0	0	1.75
6061022100	NA	NA	NA	Placer	525	11.24	74.29	14.48	0	92	0	3.81	2.86	1.33
6061022200	5.33	3.61	1-5% (lowest scores)	Placer	751	15.31	62.32	22.37	5.99	93.21	0	0	0	0.8
6061022300	NA	NA	NA	Placer	415	0	71.57	28.43	0	95.18	0	0	4.82	0
6061022400	9.57	11.86	10-15%	Placer	4402	13.88	70.24	15.88	13.08	68.58	1.84	0.34	11.88	4.27
6061022500	8.83	10.29	10-15%	Placer	4721	14.3	69.86	15.84	9.4	63.06	2.73	0.93	18	5.87
6061022600	17.91	32.50	30-35%	Placer	5042	12	79.19	8.81	10.93	65.25	4.52	0.22	10.13	8.94
6061022800	10.05	13.06	10-15%	Placer	4685	17.72	71.55	10.74	13.98	61.75	1.9	0	18.44	3.93
6061022900	8.32	9.18	5-10%	Placer	5394	15.09	78.98	5.93	14.26	60.27	0.78	1.24	19.93	3.52
6061023000	6.90	6.57	5-10%	Placer	3623	16.23	75.3	8.47	11.45	63.29	3.86	0.14	12.81	8.45
6061023100	10.26	13.62	10-15%	Placer	8339	13.14	74.09	12.77	10.22	63.78	3.48	0	16.98	5.54
6061023200	8.73	10.02	10-15%	Placer	6000	21.22	70.02	8.77	16.65	63.47	2.9	0	14.73	2.25
6061023300	6.71	6.16	5-10%	Placer	5930	15.75	75.68	8.57	16.66	63.84	2.04	0.13	10.36	6.96
6061023400	13.80	22.47	20-25%	Placer	5674	15	72.66	12.34	21.15	68.17	2.27	0	6.36	2.04
6061023500	4.98	3.00	1-5% (lowest scores)	Placer	6011	17.02	73.13	9.85	16.49	70.7	1.63	0	9.93	1.25
6061023600	4.64	2.46	1-5% (lowest scores)	Placer	4182	0	15.93	84.07	6.91	89.43	0	0	3.66	0
6061023700	8.39	9.39	5-10%	Placer	3197	0	9.48	90.52	2.75	93.81	0.91	0	2.53	0
6061023800	11.75	17.22	15-20%	Placer	3023	0.96	17.43	81.61	4.4	86.21	2.94	0.17	5.22	1.06
6061023900	7.31	7.38	5-10%	Placer	3289	12.5	74.31	13.2	23.69	68.93	1	0.15	2.49	3.74
6063000100	15.14	25.86	25-30%	Plumas	5446	8.56	73.12	18.33	9.99	81.31	2.39	1.27	0.73	4.32
6063000201	9.03	10.67	10-15%	Plumas	1359	5.89	49.3	44.81	6.11	92.94	0	0	0.96	0
6063000202	11.93	17.73	15-20%	Plumas	1142	5.78	59.89	34.33	3.06	94.66	0.53	0	1.75	0
6063000300	19.69	36.71	35-40%	Plumas	4409	15.15	64.19	20.66	9.96	82.44	0.11	2.18	2	3.31
6063000400	22.86	44.09	40-45%	Plumas	2510	7.69	60.4	31.91	4.58	72.79	0	3.94	5.3	13.39
6063000501	15.84	27.45	25-30%	Plumas	2145	6.71	65.36	27.93	13.05	85.55	0	0	0.19	1.21
6063000502	17.48	31.49	30-35%	Plumas	1649	5.28	49.85	44.88	10.55	87.63	0	0.24	0	1.58
6065030101	39.38	73.92	70-75%	Riverside	1201	7.74	85.35	6.91	58.53	11.24	14.65	0	13.32	2.25
6065030103	63.55	97.29	95-100% (highest scores)	Riverside	2277	18.14	72.82	9.05	70.22	24.95	0.22	0.04	2.37	2.2
6065030104	57.90	94.48	90-95%	Riverside	7650	9.78	83.49	6.73	66.25	13.28	8.47	0.12	9.52	2.37
6065030200	49.87	87.72	85-90%	Riverside	4469	8.64	78.65	12.71	38.8	51.4	3.49	0.16	1.79	4.36
6065030300	67.08	98.45	95-100% (highest scores)	Riverside	4071	7.98	79.39	12.63	49.99	34.66	10.81	0.2	1.77	2.58
6065030400	68.45	98.75	95-100% (highest scores)	Riverside	6741	14.66	74.8	10.55	83.09	9.09	6.11	0	1.7	0
6065030501	43.66	80.33	80-85%	Riverside	4557	10.31	78.82	10.86	62.85	15.36	13.17	0	7.75	0.88
6065030502	71.87	99.33	95-100% (highest scores)	Riverside	1963	13.65	80.9	5.45	81.61	10.09	8.1	0	0	0.2
6065030503	51.59	89.54	85-90%	Riverside	3592	22.22	74.22	3.56	84.38	6.68	5.46	0	0.22	3.26
6065030601	19.12	35.44	35-40%	Riverside	5586	7.89	67.54	24.56	14.72	61.82	5.48	0.21	16.02	1.75
6065030602	16.89	30.21	30-35%	Riverside	3229	9.94	61.78	28.28	17.28	68.01	5.57	0.53	5.42	3.19
6065030603	17.75	32.15	30-35%	Riverside	3232	9.13	71.32	19.55	26.67	65.75	1.24	0	4.52	1.83
6065030700	28.28	55.43	55-60%	Riverside	5927	16.6	69.9	13.5	47.07	46.43	3.64	0	0.94	1.91
6065030800	23.83	46.33	45-50%	Riverside	7801	13.41	74.25	12.34	46.49	42.15	5.5	0.67	5.17	0.03
6065030900	35.54	68.46	65-70%	Riverside	3059	13.04	75.09	11.87	67.05	21.31	4.67	0.26	6.28	0.42
6065031001	25.42	49.72	45-50%	Riverside	5872	14.8	70.33	14.87	56.62	35.71	5.31	0.65	0.77	0.94
6065031002	43.82	80.58	80-85%	Riverside	5202	14.24	77.85	7.9	79.89	12.61	4.38	0.48	0	2.63
6065031100	39.00	73.45	70-75%	Riverside	5726	19.4	68.13	12.47	42.04	42.18	8.42	0.56	1.48	5.33
6065031200	33.27	64.51	60-65%	Riverside	7184	9.95	77.88	12.17	55.41	40.38	0.72	0	3.48	0
6065031300	53.16	90.99	90-95%	Riverside	3277	18.28	74.92	6.81	96.09	1.65	0.92	0	0.55	0.79
6065031401	44.94	81.92	80-85%	Riverside	7635	13.65	76.32	10.03	56.02	31.83	9.6	0	0.96	1.6
6065031402	37.00	70.57	70-75%	Riverside	7793	11.15	76.57	12.28	50.3	41.2	3.57	0.09	1.81	3.03
6065031501	32.30	62.91	60-65%	Riverside	7993	7.43	82.71	9.86	50.36	34.31	4.47	1.66	5.77	3.44
6065031502	37.98	72.13	70-75%	Riverside	8357	13.21	68.61	18.18	59.03	28.32	9.08	0.31	1.21	2.05
6065031601	55.45	92.89	90-95%	Riverside	4499	14.34	73.97	11.69	65.15	25.52	3.58	0	5.29	0.47
6065031602	43.64	80.31	80-85%	Riverside	6311	14.2	77.07	8.73	76.98	16.65	2.17	0.29	2.43	1.49

6065031701	41.49	77.31	75-80%	Riverside	2403	10.61	70.54	18.85	60.17	21.68	5.45	0	11.69	1
6065031702	31.60	61.64	60-65%	Riverside	2322	13.09	67.83	19.08	52.07	37.86	2.24	0	7.15	0.69
6065031703	34.74	67.15	65-70%	Riverside	4115	9.23	80.61	10.16	61.58	28.36	2.02	0.27	5.81	1.97
6065031704	37.30	70.98	70-75%	Riverside	5838	14.29	73.57	12.14	53.43	30.08	4.01	0.1	10.79	1.59
6065040101	58.51	94.77	90-95%	Riverside	4542	20.41	71.99	7.6	76.51	12.59	10.5	0	0	0.4
6065040102	48.49	86.14	85-90%	Riverside	4810	17.61	72.62	9.77	66.11	26.03	3.18	0.33	2.87	1.48
6065040201	41.90	77.89	75-80%	Riverside	6340	11.94	82.4	5.66	75.8	16.89	2.93	0.25	2.94	1.18
6065040202	31.69	61.81	60-65%	Riverside	3342	18.31	70.89	10.8	67.27	29.74	0.45	0.87	0.78	0.9
6065040203	52.60	90.61	90-95%	Riverside	4422	14.56	80.21	5.22	93.24	4.82	1.83	0	0.11	0
6065040204	59.91	95.65	95-100% (highest scores)	Riverside	4160	19.09	74.59	6.32	88.99	5.22	5.17	0	0	0.63
6065040301	48.07	85.60	85-90%	Riverside	8542	22.91	67.89	9.2	82.45	11.79	4.62	0	1.13	0
6065040302	26.49	51.95	50-55%	Riverside	7414	8.94	78.93	12.13	53.47	32.14	2	0	10.4	2
6065040303	48.55	86.20	85-90%	Riverside	4321	16.69	75.82	7.5	66.47	20.69	4.7	0	6.85	1.3
6065040402	47.62	85.04	85-90%	Riverside	4373	15.92	74.46	9.63	76.29	22.98	0.14	0.46	0.14	0
6065040403	39.90	74.82	70-75%	Riverside	5723	11.46	79.57	8.96	79.07	19.22	0.82	0	0	0.89
6065040404	36.55	69.93	65-70%	Riverside	2972	12.65	77.19	10.16	59.19	23.28	2.32	0	11	4.21
6065040405	34.03	65.87	65-70%	Riverside	6404	15.44	70.6	13.96	52.61	36.62	5.07	0	4.51	1.19
6065040501	46.32	83.66	80-85%	Riverside	7327	14.24	74.97	10.8	78.86	17.78	0.44	0	1.62	1.3
6065040502	47.73	85.15	85-90%	Riverside	6650	15.01	78.35	6.65	76.35	14.72	5.98	0.08	1.86	1.01
6065040503	46.32	83.67	80-85%	Riverside	4155	7.92	62.02	30.06	62.5	25.32	9.39	0	2.38	0.41
6065040603	39.39	73.94	70-75%	Riverside	3346	14.11	78.87	7.02	77.47	11.63	0	0	10.91	0
6065040604	25.13	48.99	45-50%	Riverside	5363	9.42	73.32	17.27	56.87	38.04	0.02	0.52	1.25	3.3
6065040605	35.11	67.76	65-70%	Riverside	3208	16.77	79.11	4.11	88.56	10.44	0	0	0.81	0.19
6065040606	33.52	65.00	65-70%	Riverside	3746	15.56	79.04	5.39	87	10.41	0	0	1.76	0.83
6065040607	39.42	74.00	70-75%	Riverside	12853	13.56	76.94	9.5	50.15	21.8	5	0	18.72	4.33
6065040609	30.69	60.07	60-65%	Riverside	14774	25.42	67.25	7.32	30.24	23.11	6.63	0	34.18	5.84
6065040611	24.37	47.58	45-50%	Riverside	8054	14.53	80.08	5.39	42.25	24.93	7.75	0.25	20.04	4.78
6065040613	21.57	41.25	40-45%	Riverside	11946	14.67	77.41	7.92	41.36	20.74	6.55	0	26.49	4.86
6065040615	27.07	53.16	50-55%	Riverside	10810	17.31	74.08	8.61	37.69	24.29	8.8	0	20.54	8.69
6065040616	22.89	44.19	40-45%	Riverside	8333	13.81	78.09	8.1	36.11	17.05	12.2	0	31.68	2.95
6065040701	15.43	26.50	25-30%	Riverside	2417	7.16	74.97	17.87	26.4	63.84	4.43	0	4.1	1.24
6065040702	19.80	36.98	35-40%	Riverside	2614	10.33	74.22	15.46	34.2	62.05	0.46	0	1.11	2.18
6065040703	19.56	36.37	35-40%	Riverside	2643	9.19	75.41	15.4	33.41	61.1	0.23	0	2.69	2.57
6065040806	14.05	23.18	20-25%	Riverside	3202	9.03	77.64	13.34	38.76	54.18	0.5	0.5	4.81	1.25
6065040807	16.89	30.19	30-35%	Riverside	3543	16.91	70.84	12.25	51.26	36.16	3.67	0	4.6	4.32
6065040808	34.33	66.43	65-70%	Riverside	8774	19.51	71.6	8.89	61.6	20.08	7.28	0	7.08	3.95
6065040809	34.14	66.14	65-70%	Riverside	4262	14.88	76.33	8.8	53.64	24.66	6.43	0	14.55	0.73
6065040812	37.28	70.95	70-75%	Riverside	4059	14.24	73.86	11.9	41.34	56.52	0	0	0.34	1.8
6065040813	19.07	35.31	35-40%	Riverside	6377	8.44	76.15	15.41	28.57	55.34	2.34	0	12.45	1.3
6065040814	22.68	43.65	40-45%	Riverside	5152	19.2	75.27	5.53	43.05	31.35	7.49	0.6	13.29	4.21
6065040815	26.41	51.70	50-55%	Riverside	3960	11.89	80.1	8.01	35.68	23.48	13.18	0	24.57	3.08
6065040816	12.25	18.63	15-20%	Riverside	2446	8.3	82.62	9.08	35.4	32.87	11.53	0.08	15.13	4.99
6065040821	33.52	65.04	65-70%	Riverside	5973	14.41	78.2	7.38	35.74	34.62	9.61	0.72	15.81	3.5
6065040901	28.77	56.51	55-60%	Riverside	8029	14.44	77.28	8.28	50.59	21.83	7.26	0.45	16.4	3.46
6065040902	29.84	58.40	55-60%	Riverside	6486	11.07	71.69	17.24	50.68	31.9	1.4	0.11	10.66	5.24
6065040903	28.33	55.51	55-60%	Riverside	2889	16.1	71.79	12.11	60.99	25.34	4.57	0	3.98	5.12
6065040904	30.69	60.10	60-65%	Riverside	4365	12.19	76.4	11.41	64.99	26.69	2.96	0.11	4.71	0.53
6065041001	53.58	91.39	90-95%	Riverside	2750	16.73	77.6	5.67	65.78	21.31	10.62	1.31	0.98	0
6065041002	40.47	75.82	75-80%	Riverside	3551	15.29	77.47	7.24	82.57	10.31	4.48	0	1.72	0.93
6065041003	25.12	48.98	45-50%	Riverside	2814	9.95	80.63	9.42	66.28	23.45	4.16	0	4.83	1.28
6065041004	46.95	84.35	80-85%	Riverside	4798	15.26	76.01	8.73	66.97	18.72	4.96	0	5.73	3.63
6065041101	54.61	92.22	90-95%	Riverside	6247	26.78	66.96	6.26	90.99	7.7	0.93	0	0	0.38
6065041102	38.64	73.08	70-75%	Riverside	4689	11.99	81.32	6.7	74.39	17.51	1.92	0.15	4.31	1.73
6065041201	40.33	75.54	75-80%	Riverside	4370	10.8	78.17	11.03	68.12	18.58	5.33	0.09	7.87	0
6065041202	37.27	70.92	70-75%	Riverside	4683	13.09	76.79	10.12	82.19	13.52	0.85	0.62	2.46	0.36
6065041203	54.26	91.86	90-95%	Riverside	3499	14.09	80.51	5.4	80.48	9.72	2.97	0	5.63	1.2
6065041301	33.77	65.49	65-70%	Riverside	3902	20.96	72.07	6.97	83.14	9.41	1.79	0	4.74	0.92
6065041302	37.45	71.31	70-75%	Riverside	4786	14.67	79.34	6	85.19	8.04	2.19	0.29	3.95	0.33

6065041403	35.42	68.24	65-70%	Riverside	4106	10.74	71.77	17.49	44.52	30.57	5.72	0.22	15.76	3.21
6065041404	31.53	61.55	60-65%	Riverside	3927	12.27	77.29	10.44	55.9	25.11	6.37	0.08	7.71	4.84
6065041405	33.65	65.22	65-70%	Riverside	4478	10.79	79.88	9.33	56.14	26.49	6.95	1.72	7.05	1.65
6065041406	31.14	60.93	60-65%	Riverside	5974	12.91	80.43	6.66	51.54	26.65	8.35	0	10.3	3.16
6065041407	37.34	71.12	70-75%	Riverside	5873	13.06	75.57	11.37	66.12	19.85	6.32	0	6.18	1.53
6065041408	42.72	79.02	75-80%	Riverside	4581	10.59	82.73	6.68	62.06	21.89	6.09	0	4.3	5.65
6065041409	31.53	61.57	60-65%	Riverside	16512	13.52	77.52	8.96	33.3	41.64	6.52	0.56	16.2	1.79
6065041410	54.03	91.70	90-95%	Riverside	2949	17.6	75.14	7.26	95.66	2.37	0.31	1.39	0.27	0
6065041411	31.05	60.75	60-65%	Riverside	2697	13.01	70.11	16.87	74.38	19.87	2.15	0	2.67	0.93
6065041412	36.95	70.51	70-75%	Riverside	5542	7.33	76.49	16.19	58.95	24.99	5.9	0.34	9.67	0.14
6065041500	48.66	86.33	85-90%	Riverside	3263	13.79	79.93	6.28	65.98	20.35	5.52	1.78	5.85	0.52
6065041600	54.48	92.10	90-95%	Riverside	6511	17.03	78.94	4.02	86.81	7.48	1.66	0	2.58	1.47
6065041702	28.37	55.65	55-60%	Riverside	5185	12.98	75.06	11.96	63.72	31.42	2.18	0	1.83	0.85
6065041703	44.18	81.06	80-85%	Riverside	6378	16.67	75.76	7.57	77.8	15.65	4.31	0.36	0.88	1
6065041704	55.40	92.86	90-95%	Riverside	3815	14.15	80.21	5.64	86.5	8.31	1.1	0	3.36	0.73
6065041803	14.17	23.45	20-25%	Riverside	7092	13.3	76.73	9.97	28.36	44.8	4.34	0	17.6	4.91
6065041804	14.64	24.62	20-25%	Riverside	4826	9.82	77.52	12.66	34.87	49.01	3.4	0	11.68	1.04
6065041805	20.24	38.09	35-40%	Riverside	6205	13.65	79.1	7.25	53.2	29.43	4.22	0	8.69	4.46
6065041806	10.21	13.49	10-15%	Riverside	4858	14.51	76.41	9.08	33.45	36.23	10.68	0	16.81	2.82
6065041807	19.62	36.54	35-40%	Riverside	2329	9.15	77.2	13.65	48.13	43.15	2.23	0	3.65	2.83
6065041808	14.61	24.58	20-25%	Riverside	6728	9.54	74.2	16.26	31.21	46.18	4.38	0	16.19	2.04
6065041809	28.73	56.39	55-60%	Riverside	5815	9.37	81.51	9.11	35.22	50.52	7.7	0	4.66	1.89
6065041810	18.46	33.84	30-35%	Riverside	6192	11.01	80.1	8.88	31.4	47.01	6.38	0	11.76	3.46
6065041812	23.69	45.86	45-50%	Riverside	3336	12.29	72.03	15.68	44	43.02	4.17	0.27	8.09	0.45
6065041813	46.36	83.70	80-85%	Riverside	7165	13.3	72.92	13.78	63.67	28.36	2.99	0.07	4.27	0.64
6065041904	31.88	62.19	60-65%	Riverside	5391	9.27	80.99	9.74	48.6	40.96	1.28	0	9.01	0.15
6065041905	24.99	48.69	45-50%	Riverside	3391	14.6	76.47	8.94	58.12	27.75	6.13	0.94	3.21	3.83
6065041906	33.86	65.62	65-70%	Riverside	6583	13.16	75.92	10.92	65.58	25.51	2.57	0	3.81	2.54
6065041909	34.49	66.65	65-70%	Riverside	5622	11.44	75.03	13.54	55.96	34.26	0.96	0	6.12	2.7
6065041910	15.37	26.36	25-30%	Riverside	7685	10.81	67.52	21.67	37.61	41.91	8.84	0.4	7.99	3.25
6065041911	19.61	36.49	35-40%	Riverside	13750	16.88	69.6	13.52	29.94	40.87	9.4	0	15.33	4.46
6065041912	22.70	43.73	40-45%	Riverside	6797	12.58	76.12	11.3	25.61	44.05	1.65	0.35	23.71	4.62
6065041913	16.29	28.56	25-30%	Riverside	5414	12.1	76.89	11.01	32.71	47.1	2.94	0.44	13.87	2.94
6065042003	19.61	36.50	35-40%	Riverside	6776	13.02	74.75	12.23	36.05	44.89	6.29	0.19	9.77	2.8
6065042004	11.47	16.54	15-20%	Riverside	3722	7.17	72.03	20.8	36.24	54.94	5.29	0	1.78	1.75
6065042005	17.20	30.79	30-35%	Riverside	5821	8.28	79.01	12.71	32.76	42.71	6.13	0	14.45	3.95
6065042007	30.08	58.80	55-60%	Riverside	5058	12.79	71.19	16.01	22.99	61.74	7.63	0.53	3.12	3.97
6065042008	11.34	16.21	15-20%	Riverside	8902	14.84	70.71	14.45	43.74	42.65	5.29	0.42	5.67	2.22
6065042009	30.49	59.64	55-60%	Riverside	8126	14.5	72.96	12.54	61.3	23.12	7.16	0.41	5.73	2.28
6065042010	42.89	79.30	75-80%	Riverside	6179	15.97	72.18	11.85	79.11	8.79	11.41	0	0	0.7
6065042012	17.35	31.18	30-35%	Riverside	6956	15.09	77.83	7.07	36.75	39.97	10.49	0.07	7.73	4.99
6065042013	16.03	27.92	25-30%	Riverside	7811	9.95	79.81	10.24	16.76	51.98	6.07	0	18.31	6.89
6065042014	13.89	22.74	20-25%	Riverside	11624	12.14	79.38	8.48	35.44	40.32	11	0	10.23	3.01
6065042206	30.25	59.19	55-60%	Riverside	5820	10.6	78.93	10.46	31.2	47.61	8.83	1.55	7.25	3.56
6065042207	14.81	25.09	25-30%	Riverside	2889	6.96	71.86	21.18	24.16	57.36	4.88	0.17	7.27	6.16
6065042208	12.34	18.85	15-20%	Riverside	2635	13.93	65.84	20.23	26.87	58.03	1.44	0	7.14	6.53
6065042209	67.33	98.49	95-100% (highest scores)	Riverside	5439	16.36	78.71	4.93	47.31	19.18	10.26	2.79	17.98	2.48
6065042210	39.04	73.55	70-75%	Riverside	4856	10.13	87.85	2.02	45.45	26.85	7.27	1.19	14.33	4.9
6065042212	30.75	60.16	60-65%	Riverside	6511	14.48	75.9	9.61	46.61	25.14	15.96	0	9.66	2.63
6065042213	32.83	63.70	60-65%	Riverside	4271	6.32	78.37	15.31	26.95	44.74	2.01	0.35	21.92	4.03
6065042214	28.61	56.11	55-60%	Riverside	6933	11.96	76.86	11.18	45.75	30.58	12.81	0	8.97	1.89
6065042217	13.85	22.63	20-25%	Riverside	5377	11.44	74.39	14.17	23.34	56.65	9.84	0	1.97	8.2
6065042300	56.73	93.75	90-95%	Riverside	8827	19.55	71.66	8.79	61.99	24.64	3.13	0.49	8.76	0.99
6065042401	19.91	37.34	35-40%	Riverside	2090	5.65	79.09	15.26	42.73	49.43	3.4	0.62	1.53	2.3
6065042402	23.00	44.50	40-45%	Riverside	4944	17.29	71.56	11.14	55.99	20.43	14.89	0.44	6.94	1.31
6065042403	24.29	47.37	45-50%	Riverside	4122	14.73	71.03	14.24	60.75	21.88	12.62	0	3.49	1.26
6065042404	35.71	68.75	65-70%	Riverside	2214	11.2	79.9	8.9	69.74	18.93	6.5	0	0.95	3.88
6065042405	45.03	81.98	80-85%	Riverside	5324	19.1	74.85	6.05	58.47	9.34	27.4	2.35	2.03	0.41

6065042406	26.46	51.82	50-55%	Riverside	4675	12.81	78.05	9.13	61.03	16.64	12.26	0.15	7.76	2.16
6065042407	25.59	50.09	50-55%	Riverside	3411	15.24	75.96	8.8	62.24	29.7	3.64	0	2.58	1.85
6065042408	21.28	40.49	40-45%	Riverside	3437	14.49	74.02	11.49	52.78	24.53	9.72	0	12.49	0.49
6065042409	20.49	38.75	35-40%	Riverside	3467	12.17	79	8.83	54.69	25.38	15.78	0	3.43	0.72
6065042410	18.04	32.78	30-35%	Riverside	5627	12.88	75.16	11.96	47.73	20.85	17.81	0.32	9.9	3.39
6065042411	14.92	25.34	25-30%	Riverside	2327	12.76	75.59	11.65	49.2	26.51	18.01	0	3.39	2.88
6065042412	21.07	40.09	40-45%	Riverside	4965	9.83	74.36	15.81	41.67	38.61	14.12	0	1.49	4.11
6065042505	69.96	99.07	95-100% (highest scores)	Riverside	3542	17.98	75.95	6.07	82.5	6.07	10.36	0	0.93	0.14
6065042506	41.51	77.34	75-80%	Riverside	9138	14.62	77.89	7.49	46.79	14.13	25.92	0.13	10.33	2.69
6065042507	41.65	77.56	75-80%	Riverside	4797	10.99	78.65	10.36	69.06	7.25	13.3	0.85	8.9	0.63
6065042508	40.16	75.24	75-80%	Riverside	5486	15.29	79.42	5.29	81.7	5.83	9.39	0	2.75	0.33
6065042509	33.16	64.37	60-65%	Riverside	3325	18.23	70.62	11.16	74.71	14.32	7.91	0.18	1.89	0.99
6065042510	42.29	78.43	75-80%	Riverside	5473	16.06	77.84	6.1	70.98	7.05	12.57	0.05	7.2	2.14
6065042511	34.33	66.41	65-70%	Riverside	3357	19.75	72.62	7.63	73.49	10.84	11.86	0	1.64	2.17
6065042512	40.47	75.81	75-80%	Riverside	3378	15.93	80.08	4	73	5.89	16.16	0	4.12	0.83
6065042513	37.98	72.11	70-75%	Riverside	2973	8.27	79.35	12.38	74.3	16.85	4.27	0	3.16	1.41
6065042514	32.97	63.97	60-65%	Riverside	3467	15.86	76.72	7.41	53.68	16.84	18	0.03	10.7	0.75
6065042515	48.70	86.37	85-90%	Riverside	3795	20.4	73.28	6.32	64.27	9.8	22.87	0	3.06	0
6065042516	31.73	61.90	60-65%	Riverside	4378	14.92	80.08	5	68.73	7.24	17.02	0	4.66	2.35
6065042517	21.30	40.52	40-45%	Riverside	3335	13.49	78.83	7.68	70.28	13.61	11.03	0	2.79	2.28
6065042518	30.89	60.46	60-65%	Riverside	3497	16.47	75.09	8.44	61.71	12.44	19.99	0.26	4.6	1
6065042519	39.79	74.66	70-75%	Riverside	1873	19.27	70.48	10.25	66.26	8.38	23.87	0.43	0.75	0.32
6065042520	30.56	59.77	55-60%	Riverside	4928	11.65	79.53	8.83	77.62	8.46	8.6	0.16	3.63	1.52
6065042521	29.16	57.17	55-60%	Riverside	5338	14.2	78.76	7.04	71.15	11.5	14.01	0.19	1.69	1.46
6065042617	31.63	61.69	60-65%	Riverside	11457	15.27	79.03	5.71	80.63	5.31	9.84	0	3.28	0.94
6065042618	26.32	51.53	50-55%	Riverside	8788	16.56	77.41	6.03	85.69	6.93	6.7	0.05	0.61	0.02
6065042619	19.13	35.49	35-40%	Riverside	12354	17.2	76.78	6.02	64.23	14.24	12.98	0.16	4.71	3.68
6065042620	35.97	69.11	65-70%	Riverside	14520	17.47	75.51	7.02	69.28	8.44	13.47	0	7.95	0.85
6065042621	34.34	66.44	65-70%	Riverside	7938	17.23	74.69	8.08	59.26	11.94	16.64	0	10.18	1.98
6065042622	32.53	63.36	60-65%	Riverside	4827	12.78	80.88	6.34	49.1	9.92	27.12	0	6.8	7.06
6065042623	21.71	41.55	40-45%	Riverside	3939	17.9	70.02	12.08	37.37	18.25	28.66	0	10.89	4.82
6065042624	29.88	58.43	55-60%	Riverside	4390	10.23	82.3	7.47	50.71	20.66	14.87	0	9.32	4.44
6065042706	37.77	71.70	70-75%	Riverside	8416	18.44	75.08	6.48	77.63	4.66	13.15	0	2.83	1.73
6065042708	18.55	34.09	30-35%	Riverside	5149	15.52	76.46	8.02	40.07	49.91	2.08	0	6.57	1.38
6065042709	9.59	11.91	10-15%	Riverside	4674	11.66	55.69	32.65	35.39	56.25	1.31	3.62	1.48	1.97
6065042711	20.47	38.65	35-40%	Riverside	4134	2.23	38.49	59.29	9.53	71.99	13.09	0.56	1.62	3.22
6065042714	9.47	11.61	10-15%	Riverside	3519	8.04	69.82	22.14	4.63	79.8	0	0.51	10.66	4.4
6065042715	25.09	48.89	45-50%	Riverside	14869	19.69	71.96	8.35	44.89	38.25	4.85	0	8.4	3.62
6065042716	9.71	12.23	10-15%	Riverside	5275	15.89	68.28	15.83	24.15	72.55	0	0.28	0.91	2.1
6065042717	17.47	31.45	30-35%	Riverside	5181	17.66	73.81	8.53	54.31	40.46	0	0	2.34	2.9
6065042719	36.30	69.59	65-70%	Riverside	5470	15.96	73.69	10.35	68.54	25.67	5.01	0	0.13	0.66
6065042720	27.97	54.89	50-55%	Riverside	5371	12.79	73.45	13.76	59	33.46	0.47	0	4.4	2.68
6065042723	24.84	48.40	45-50%	Riverside	6537	15.1	69.27	15.63	55.85	38.37	3.79	0.78	0.67	0.54
6065042724	14.18	23.47	20-25%	Riverside	4054	16.11	75.48	8.41	41.39	41.07	6.71	0.27	7.15	3.4
6065042726	19.51	36.23	35-40%	Riverside	9300	16.16	72.67	11.17	45.52	34.12	7.81	0.47	7.65	4.44
6065042728	15.72	27.17	25-30%	Riverside	2229	13.64	70.44	15.93	49.17	43.07	2.06	1.12	1.75	2.83
6065042729	20.16	37.88	35-40%	Riverside	9987	10.48	58.64	30.88	29.18	47.71	9.89	0.28	7.86	5.08
6065042730	29.35	57.54	55-60%	Riverside	5684	8.55	80.47	10.98	76.5	21.25	0.19	0	1.44	0.62
6065042731	27.93	54.83	50-55%	Riverside	8161	12.5	75.46	12.05	60.14	28.44	6.92	0	2.63	1.86
6065042732	11.78	17.28	15-20%	Riverside	6571	17.84	74.51	7.65	51.99	35.09	6	0.14	4.38	2.4
6065042733	17.51	31.59	30-35%	Riverside	11856	23.04	67.97	8.99	32.86	44.24	9.67	0.09	8.34	4.8
6065042737	16.85	30.11	30-35%	Riverside	2766	14.86	75.67	9.47	30.19	45.91	10.48	1.41	9.51	2.49
6065042738	23.10	44.78	40-45%	Riverside	8614	17.27	76.21	6.51	33.33	47.13	6.7	0.49	9.65	2.7
6065042739	16.75	29.79	25-30%	Riverside	7631	15.79	75.13	9.08	31.94	43.56	8.19	0.21	10.26	5.84
6065042740	20.54	38.89	35-40%	Riverside	1858	0	31.97	68.03	4.79	78.96	8.29	0	4.09	3.88
6065042741	29.90	58.47	55-60%	Riverside	2087	0.38	31	68.62	13.7	77.53	3.07	0.34	3.83	1.53
6065042742	14.51	24.36	20-25%	Riverside	4846	16.36	73.88	9.76	41.09	50.47	3.47	0.04	2.58	2.35
6065042743	16.36	28.68	25-30%	Riverside	3528	16.21	73.3	10.49	26.9	59.13	4.02	0	6.74	3.2

6065042744	30.47	59.57	**55-60%**	Riverside	4573	14.26	75.11	10.63	62.37	35.38	0	0.13	0.02	2.1
6065042745	22.35	42.90	**40-45%**	Riverside	5413	9.09	59.02	31.89	38.09	51.21	5.01	0	3.81	1.88
6065042800	57.89	94.47	**90-95%**	Riverside	9515	16.91	77.75	5.34	86.35	8.39	3.03	0.38	1.1	0.76
6065042901	44.87	81.85	**80-85%**	Riverside	7591	15.23	74.11	10.66	80.89	14.17	3.77	0.11	0.75	0.32
6065042902	38.46	72.89	**70-75%**	Riverside	5095	14.74	73.44	11.82	73.66	22.75	0.98	0.51	1.98	0.12
6065042903	29.42	57.63	**55-60%**	Riverside	6126	14.48	76.58	8.95	81.41	14.79	1.67	0.23	1.89	0.02
6065042904	43.77	80.51	**80-85%**	Riverside	10637	15.73	74.54	9.73	80.02	7.38	8.85	0	3.15	0.6
6065043001	39.86	74.76	**70-75%**	Riverside	7090	21.72	69.31	8.97	57.52	25.59	10.16	0	5.11	1.64
6065043003	32.97	63.99	**60-65%**	Riverside	7243	19.3	74.51	6.19	64.93	20.96	4.4	0.66	4.5	4.54
6065043005	38.38	72.78	**70-75%**	Riverside	5960	14.01	78.46	7.53	64.58	24.83	1.74	0	1.28	7.57
6065043006	45.47	82.54	**80-85%**	Riverside	5402	19.14	72.14	8.72	73.92	16.64	5.52	0	2.36	1.57
6065043007	9.06	10.69	**10-15%**	Riverside	7420	16.32	76.93	6.75	41.54	44	5.77	0.54	6.22	1.94
6065043008	21.77	41.69	**40-45%**	Riverside	7427	18.94	72.12	8.94	53.68	36.6	3.65	0.22	3.99	1.87
6065043009	15.13	25.82	**25-30%**	Riverside	5712	14.97	77.73	7.3	52.63	37.55	2.36	0.39	5.95	1.12
6065043010	15.63	26.98	**25-30%**	Riverside	5956	14.12	77.75	8.13	53.34	36.77	2.12	1.65	3.24	2.89
6065043206	27.07	53.19	**50-55%**	Riverside	7966	12.99	76.14	10.87	30.32	47.75	2.33	0.34	11.86	7.41
6065043211	19.15	35.51	**35-40%**	Riverside	5519	14.3	75.59	10.11	37.98	49.32	4.44	0.83	5.76	1.67
6065043216	27.15	53.33	**50-55%**	Riverside	6105	14.25	74.89	10.86	31.15	55.17	4.54	0	6.39	2.75
6065043217	15.17	25.93	**25-30%**	Riverside	3336	14.57	73.41	12.02	35.61	51.65	3.66	0	2.7	6.38
6065043218	10.90	15.22	**15-20%**	Riverside	5338	9.18	76.94	13.88	31.42	55	2.25	0	10.25	1.09
6065043220	23.39	45.37	**45-50%**	Riverside	4610	18.05	75.73	6.23	38.87	45.73	4.69	0	8.16	2.56
6065043222	23.96	46.70	**45-50%**	Riverside	5029	10.66	72.28	17.06	20.28	61.9	0.72	0	9.51	7.6
6065043227	16.04	27.95	**25-30%**	Riverside	7895	12.58	79.29	8.13	29.72	38.59	10.39	0	9.36	11.94
6065043228	25.38	49.66	**45-50%**	Riverside	3842	10.52	78.21	11.27	40.37	49.71	3.23	0.57	2.65	3.46
6065043229	14.88	25.23	**25-30%**	Riverside	5110	8.81	47.08	44.11	21.33	70.88	1.17	0	4.66	1.96
6065043235	11.95	17.78	**15-20%**	Riverside	10588	17.98	73.6	8.42	25.1	41.5	9.91	0.2	18.43	4.86
6065043239	26.57	52.14	**50-55%**	Riverside	7763	15.1	68.88	16.02	30.03	61.2	2.36	0.22	1.54	4.66
6065043240	11.01	15.48	**15-20%**	Riverside	12415	18.52	72.84	8.64	29.49	45.98	10.22	0.27	10.9	3.15
6065043242	16.13	28.23	**25-30%**	Riverside	9531	18.71	72.58	8.71	30.22	40.39	4.45	1.74	14.92	8.28
6065043244	11.98	17.88	**15-20%**	Riverside	9755	13.12	73.07	13.81	26.77	49.51	6.88	0	9.24	7.61
6065043246	13.01	20.55	**20-25%**	Riverside	5803	14.54	73.36	12.1	21.06	61.83	2.43	0.4	7.2	7.08
6065043247	18.65	34.34	**30-35%**	Riverside	14002	20.63	73.64	5.73	32.3	46.67	5.99	0.47	11.04	3.51
6065043248	12.56	19.30	**15-20%**	Riverside	4670	13.88	74.52	11.61	29.66	50.71	1.39	0.19	14.8	3.25
6065043250	12.78	19.87	**15-20%**	Riverside	10048	14.62	78.78	6.6	27.55	46.95	3.2	0.64	16.45	5.21
6065043252	10.49	14.08	**10-15%**	Riverside	9584	18.13	72.61	9.26	20.98	53.12	5.05	1.96	11.3	7.59
6065043254	21.34	40.70	**40-45%**	Riverside	5193	13.44	73.37	13.19	32.7	52.71	2.72	1.44	7.68	2.75
6065043256	16.53	29.17	**25-30%**	Riverside	3783	11.84	80.78	7.38	35.05	36.66	10.47	0.26	14.22	3.33
6065043257	10.76	14.85	**10-15%**	Riverside	9318	11.09	75.66	13.25	23.12	50.25	3.83	1.81	14.1	6.89
6065043262	13.66	22.11	**20-25%**	Riverside	5287	13.88	70.66	15.45	24.82	67.13	1.95	0	2.99	3.12
6065043264	12.42	19.02	**15-20%**	Riverside	7862	12.08	79.64	8.28	25.53	57.35	5.32	0	8.8	3
6065043265	13.40	21.46	**20-25%**	Riverside	8221	15.85	76.94	7.21	24.29	59.69	3.26	0.38	6.73	5.66
6065043266	14.24	23.66	**20-25%**	Riverside	5763	19.24	77.22	3.54	44.04	28.42	7.31	0	9.9	10.32
6065043267	14.85	25.14	**25-30%**	Riverside	6185	9.07	68.52	22.41	20.71	68.36	1.65	0.66	5.45	3.17
6065043270	23.97	46.72	**45-50%**	Riverside	6071	14.12	73.12	12.77	33.5	46.22	8.5	0	8.6	3.18
6065043271	20.54	38.92	**35-40%**	Riverside	3977	14.79	72.87	12.35	48.1	48.91	1.06	0.2	0.8	0.93
6065043272	15.19	25.98	**25-30%**	Riverside	4957	7.61	65.5	26.89	21.24	72.38	1.69	1.13	2.56	0.99
6065043274	14.96	25.45	**25-30%**	Riverside	2383	15.86	74.32	9.82	48.85	39.91	0.88	5.67	2.85	1.85
6065043276	21.06	40.08	**40-45%**	Riverside	3855	10.14	78.63	11.23	27.06	49.11	5.01	1.76	13.28	3.79
6065043278	19.24	35.68	**35-40%**	Riverside	6360	15.08	73.46	11.46	21.51	61.37	2.91	0	6.35	7.86
6065043279	20.30	38.22	**35-40%**	Riverside	5075	14.96	72.2	12.85	30.8	63.57	0.93	0.41	2.19	2.11
6065043291	21.92	41.98	**40-45%**	Riverside	9081	6.21	73.8	19.99	27.03	49.71	4.31	0.97	13.8	4.18
6065043304	17.40	31.28	**30-35%**	Riverside	7688	13.25	64.35	22.4	28.24	61.43	1.3	0.04	4.6	4.38
6065043306	23.93	46.62	**45-50%**	Riverside	5142	13.98	68.92	17.09	47.59	42.59	2.9	1.17	3.05	2.7
6065043307	33.72	65.37	**65-70%**	Riverside	6764	17.19	64.34	18.47	38.78	42.39	11.72	0	6.34	0.77
6065043308	34.02	65.86	**65-70%**	Riverside	2892	13.93	78.6	7.47	63.24	23.51	10.75	1.11	0.21	1.18
6065043309	39.18	73.76	**70-75%**	Riverside	2837	21.33	65.07	13.61	45.22	34.9	8.64	1.37	7.05	2.82
6065043310	37.30	70.99	**70-75%**	Riverside	3534	17.43	70.4	12.17	56.56	26.09	9.85	0	5.91	1.58
6065043311	25.95	50.91	**50-55%**	Riverside	2548	14.17	74.92	10.91	43.37	50.2	1.02	0	4.91	0.51

6065043312	27.68	54.26	50-55%	Riverside	4559	19.11	72.8	8.09	73.72	19.35	2.65	0	2.37	1.91
6065043313	31.44	61.35	60-65%	Riverside	4046	16.26	75.38	8.35	54.18	29.78	6.43	2.72	3.41	3.48
6065043314	16.56	29.26	25-30%	Riverside	3482	12.38	75.04	12.58	38.31	51.03	1.44	3.13	1.35	4.74
6065043315	19.05	35.29	35-40%	Riverside	2887	12.05	76	11.95	42.36	54.1	2.04	0.21	0.24	1.04
6065043316	26.77	52.56	50-55%	Riverside	3872	10.46	44.01	45.53	19.83	57.18	9.25	0	4.16	9.58
6065043317	23.21	44.93	40-45%	Riverside	8443	15.61	69.58	14.81	47.73	38.04	6.54	2.08	3.21	2.39
6065043401	44.41	81.34	80-85%	Riverside	6883	20.21	68.91	10.88	57.87	32.04	8.12	1.28	0.39	0.31
6065043403	31.59	61.61	60-65%	Riverside	2741	21.78	63.63	14.59	53.52	34.44	7.62	0	1.35	3.06
6065043404	27.34	53.63	50-55%	Riverside	2689	3.76	57.9	38.34	42.66	48.53	5.95	0	0.82	2.05
6065043405	40.33	75.53	75-80%	Riverside	4831	15.07	61.48	23.45	52.04	35.42	10.81	0	0	1.74
6065043503	33.12	64.25	60-65%	Riverside	3875	13.08	52.57	34.35	45.73	46.94	3.23	0	2.82	1.29
6065043504	32.47	63.25	60-65%	Riverside	8208	13.71	61.5	24.79	38.02	46.88	5.95	0	5.16	3.98
6065043505	30.61	59.88	55-60%	Riverside	3148	3.72	51.59	44.7	32.08	54.26	9.05	1.27	1.4	1.94
6065043506	25.34	49.55	45-50%	Riverside	6592	10.65	64.82	24.53	46.09	44.24	4.49	0	2.43	2.76
6065043507	30.17	59.06	55-60%	Riverside	6676	16.51	70.93	12.57	58.66	23.47	10.87	0	5.68	1.32
6065043508	25.23	49.31	45-50%	Riverside	6814	10.79	74.1	15.12	42.68	49.19	4.68	1.83	0.56	1.06
6065043509	28.34	55.55	55-60%	Riverside	5404	15.01	72.67	12.32	55.88	36.81	3.87	1.63	1.26	0.56
6065043512	23.75	46.08	45-50%	Riverside	7618	15.24	69.74	15.02	49.07	27.16	12.38	0.49	5.26	5.64
6065043513	14.47	24.22	20-25%	Riverside	3532	12.94	72.34	14.72	60.42	31.88	2.27	0.59	1.3	3.54
6065043517	35.08	67.68	65-70%	Riverside	7811	18.53	73.97	7.5	52.17	31.7	6.7	0	6.23	3.2
6065043601	24.83	48.39	45-50%	Riverside	5198	17.83	74.53	7.64	72.22	14.39	9.12	1.87	0.92	1.48
6065043602	30.81	60.29	60-65%	Riverside	3389	11.27	80.29	8.44	74.98	15.43	3.84	0	3.22	2.54
6065043701	24.91	48.54	45-50%	Riverside	4328	10.7	65.62	23.68	35.14	53.67	3.42	1.69	1.96	4.11
6065043702	21.22	40.41	40-45%	Riverside	4760	12.18	70.84	16.97	44.08	50	1.55	0.82	1.6	1.95
6065043703	25.53	49.92	45-50%	Riverside	3145	11.99	75.26	12.75	43.31	48.33	5.28	0.19	1.08	1.81
6065043802	18.96	35.05	35-40%	Riverside	5996	11.94	68.66	19.4	34.89	58.32	0.88	0.22	2.5	3.19
6065043807	19.56	36.36	35-40%	Riverside	7040	17.39	73.28	9.33	42.6	36.92	10.23	3.61	5.43	1.22
6065043809	18.08	32.92	30-35%	Riverside	4046	8.68	54.42	36.9	20.84	67.13	8.4	0.32	1.36	1.95
6065043810	29.95	58.56	55-60%	Riverside	4952	8.6	58.46	32.94	36.69	47.29	6.22	0.32	7.77	1.7
6065043811	16.47	29.00	25-30%	Riverside	4031	5.56	65.37	29.07	21.51	68.35	4.24	0	2.7	3.2
6065043812	34.70	67.08	65-70%	Riverside	6526	2.18	20.1	77.72	12.15	80.26	2.21	0	4.23	1.15
6065043813	46.80	84.17	80-85%	Riverside	4912	12.93	71.19	15.88	36.56	37.89	1.77	19.52	2.3	1.95
6065043814	23.56	45.65	45-50%	Riverside	944	0	34.11	65.89	19.6	71.82	1.91	3.92	2.75	0
6065043818	21.00	39.99	35-40%	Riverside	4567	17.43	74.18	8.39	49.95	21.11	10.23	0.2	16.9	1.62
6065043820	21.44	40.97	40-45%	Riverside	4870	14.31	64.99	20.7	34	36.08	14.11	0	11.85	3.96
6065043821	36.29	69.55	65-70%	Riverside	5389	20.63	71.39	7.98	52.61	25.89	12.93	0	7.7	0.87
6065043822	38.29	72.59	70-75%	Riverside	2898	11.87	79.33	8.8	52.62	38.54	0.79	0	4.59	3.45
6065043823	23.68	45.83	45-50%	Riverside	10092	16.41	75.64	7.95	42.59	34.48	6.87	1.38	11.85	2.83
6065043900	30.89	60.44	60-65%	Riverside	6698	16.83	74.5	8.67	56.91	38.03	2.66	0.04	1.12	1.24
6065044000	47.94	85.39	85-90%	Riverside	1734	11.42	80.39	8.19	64.19	22.61	7.15	0	1.27	4.79
6065044101	42.79	79.17	75-80%	Riverside	3409	16.96	74.01	9.03	65.83	17.89	2.35	7.42	5.66	0.85
6065044102	35.15	67.81	65-70%	Riverside	2907	19.68	67.6	12.73	62.16	27.59	5.74	0	0.55	3.96
6065044103	32.48	63.29	60-65%	Riverside	5735	9.63	54.33	36.04	39.6	39.48	8.93	0	8.9	3.1
6065044104	20.08	37.70	35-40%	Riverside	2983	17.43	67.72	14.85	49.51	43.61	3.65	0	1.91	1.31
6065044200	52.19	90.25	90-95%	Riverside	6541	16.89	74.22	8.88	56.41	15.93	13.77	7.34	4.39	2.16
6065044300	37.88	71.91	70-75%	Riverside	4847	10.23	77.06	12.71	56.8	24.3	10.96	1.69	4.33	1.92
6065044402	19.55	36.33	35-40%	Riverside	5266	11.09	69.67	19.24	17.55	79.04	0.89	0	1.16	1.37
6065044403	28.82	56.63	55-60%	Riverside	4114	7.68	69.47	22.85	23.65	59.14	1	4.52	7.32	4.38
6065044404	21.95	42.02	40-45%	Riverside	1122	7.58	73.89	18.54	11.14	76.56	9.45	0	2.23	0.62
6065044405	16.44	28.90	25-30%	Riverside	1463	0	68.01	31.99	19.96	76.21	0.62	0.75	2.46	0
6065044505	21.54	41.17	40-45%	Riverside	5781	10.34	65.32	24.34	52.91	46.24	0.16	0	0.52	0.17
6065044507	19.83	37.01	35-40%	Riverside	6817	13.82	73.2	12.98	64.16	21.92	7.57	0	3.77	2.58
6065044509	19.98	37.48	35-40%	Riverside	3693	15.41	72.87	11.72	55.24	30.22	12.46	0	1.33	0.76
6065044510	19.84	37.09	35-40%	Riverside	6649	14.98	76.67	8.35	54.31	28.05	12.77	1.22	2.47	1.19
6065044515	20.55	38.93	35-40%	Riverside	3971	13.65	63.86	22.49	63.51	24.12	6.67	2.34	2.82	0.53
6065044516	16.58	29.30	25-30%	Riverside	6109	16.42	70.72	12.87	66.46	25.31	3.57	0	1.1	3.57
6065044517	7.17	7.12	5-10%	Riverside	2435	6.45	59.43	34.13	15.15	76.3	2.51	0.78	3.82	1.44
6065044518	12.02	18.00	15-20%	Riverside	5302	14.22	70.33	15.45	41.61	42.19	9.92	0	2.79	3.49

6065044520	15.83	27.42	**25-30%**	Riverside	1424	7.58	56.39	36.03	44.59	48.24	1.12	2.11	3.93	0
6065044521	20.61	39.07	**35-40%**	Riverside	1332	7.73	78.45	13.81	45.8	42.34	5.93	0	3.68	2.25
6065044522	18.05	32.83	**30-35%**	Riverside	3812	6.43	65.58	27.99	45.91	45.88	3.46	0	1.92	2.83
6065044602	22.57	43.43	**40-45%**	Riverside	2907	3.72	69.14	27.14	22.67	65.33	3.78	0	5.02	3.2
6065044604	15.07	25.74	**25-30%**	Riverside	4151	5.93	68.32	25.75	30.81	58.9	2.75	1.04	5.78	0.72
6065044605	20.45	38.53	**35-40%**	Riverside	6107	16.31	67.53	16.16	48.24	31.83	13.9	0	4.06	1.96
6065044606	23.71	45.97	**45-50%**	Riverside	2734	5.71	63.31	30.98	34.13	54.32	1.76	0	2.63	7.17
6065044701	18.04	32.82	**30-35%**	Riverside	4039	10.77	61.28	27.95	40.78	49.81	1.24	0.64	5.74	1.78
6065044702	27.14	53.30	**50-55%**	Riverside	1738	10.59	73.53	15.88	72.44	17.84	2.47	0	4.38	2.88
6065044804	16.78	29.92	**25-30%**	Riverside	2704	7.91	72.82	19.27	45.56	31.25	0.7	0.22	20.64	1.63
6065044805	9.67	12.17	**10-15%**	Riverside	1590	2.39	55.85	41.76	11.51	80.25	1.01	0	3.2	4.03
6065044806	15.69	27.09	**25-30%**	Riverside	2081	4.52	66.55	28.93	28.93	69.05	0	1.06	0.53	0.43
6065044807	14.19	23.50	**20-25%**	Riverside	1642	4.81	66.08	29.11	20.04	69.31	3.71	0	6.94	0
6065044904	16.56	29.25	**25-30%**	Riverside	5192	11.33	70.42	18.26	44.05	34.42	6.01	4.16	7.73	3.64
6065044907	21.40	40.87	**40-45%**	Riverside	5461	21.72	74.07	4.21	89.67	8.61	0.16	0	1.55	0
6065044911	12.62	19.44	**15-20%**	Riverside	4194	9.63	65.47	24.89	15.21	74.01	2.91	0	5.03	2.84
6065044915	19.74	36.85	**35-40%**	Riverside	6799	15.18	79.07	5.75	83.84	8.63	1.59	0.26	5.18	0.5
6065044916	11.02	15.52	**15-20%**	Riverside	5334	13.4	66.44	20.15	51.78	37.96	3.99	0	5.03	1.24
6065044917	8.29	9.13	**5-10%**	Riverside	5033	1.95	38.72	59.33	6.56	89.37	1.69	2.38	0	0
6065044918	10.56	14.30	**10-15%**	Riverside	2919	2.26	31.69	66.05	7.81	86.3	1.13	0.34	2.74	1.68
6065044919	10.13	13.22	**10-15%**	Riverside	5011	1.74	30.43	67.83	5.53	84.75	3.93	1.24	1.82	2.73
6065044921	7.37	7.43	**5-10%**	Riverside	2448	3.72	48.9	47.39	4.78	81.33	0.49	0.45	12.13	0.82
6065044922	7.16	7.07	**5-10%**	Riverside	5812	11.82	62.46	25.72	17.93	63.52	3.17	0.15	9.36	5.87
6065044923	15.12	25.78	**25-30%**	Riverside	4122	13.08	73.05	13.88	53.03	37.48	0.34	0	7.04	2.11
6065044924	12.04	18.08	**15-20%**	Riverside	3998	11.43	79.69	8.88	61.43	27.64	0.8	0	8.91	1.23
6065044925	12.18	18.41	**15-20%**	Riverside	3978	8.17	79.66	12.17	63.02	28.41	0.75	0	7.72	0.1
6065044926	22.24	42.64	**40-45%**	Riverside	5407	10.78	74.35	14.87	68.61	10.62	3.7	0	11.69	5.38
6065044927	12.60	19.40	**15-20%**	Riverside	3619	7.35	41.34	51.31	20.31	70.49	4.5	0	4.45	0.25
6065044928	8.79	10.20	**10-15%**	Riverside	3342	0.54	39.38	60.08	10.2	84.23	0	0	1.97	3.59
6065044929	9.37	11.31	**10-15%**	Riverside	3627	6.37	42.07	51.56	16.07	77.58	2.37	0	3.97	0
6065044930	11.20	15.91	**15-20%**	Riverside	3606	15.28	62.17	22.55	41.43	44.68	5.99	0.19	6.35	1.36
6065044931	20.83	39.65	**35-40%**	Riverside	2093	6.26	78.69	15.05	55.42	32.2	2.1	0.53	9.17	0.57
6065044932	12.15	18.31	**15-20%**	Riverside	2883	6	79.08	14.92	42.87	44.16	2.5	0	9.4	1.08
6065045000	28.36	55.62	**55-60%**	Riverside	3314	8.69	70.19	21.12	41.37	54.19	2.66	0	0.51	1.27
6065045103	10.42	13.88	**10-15%**	Riverside	3557	5.31	58.59	36.1	21.56	66.1	6.18	0.87	5.29	0
6065045108	17.90	32.46	**30-35%**	Riverside	6767	7.33	69.75	22.92	44.07	48.65	1.94	0.43	4.08	0.84
6065045109	10.36	13.79	**10-15%**	Riverside	4137	10.25	74.16	15.59	42.11	46.87	2.61	0.41	1.55	6.45
6065045110	10.08	13.11	**10-15%**	Riverside	6290	13.31	75.61	11.08	60.84	36.34	1.51	0	0.22	1.08
6065045114	4.38	2.12	**1-5% (lowest scores)**	Riverside	2153	3.39	53	43.61	9.75	84.77	1.11	0	2.88	1.49
6065045115	3.55	1.06	**1-5% (lowest scores)**	Riverside	1890	5.87	43.02	51.11	6.51	89.68	0	0	2.7	1.11
6065045116	9.57	11.88	**10-15%**	Riverside	1479	2.57	66.19	31.24	28.4	67.75	0	0	3.52	0.34
6065045117	6.37	5.45	**5-10%**	Riverside	4053	3.36	64.57	32.08	17.99	69.85	8.39	0	2.29	1.48
6065045118	14.70	24.79	**20-25%**	Riverside	2636	12.18	60.81	27.01	44.2	43.78	0.68	0	3.53	7.81
6065045119	7.85	8.22	**5-10%**	Riverside	2772	8.44	71.75	19.81	23.12	61.54	1.48	0.51	11.72	1.62
6065045120	16.07	28.06	**25-30%**	Riverside	4788	14.68	63.74	21.57	57.52	39.2	0.86	0	1.86	0.56
6065045121	17.55	31.71	**30-35%**	Riverside	6454	11.33	49.07	39.6	24.88	65.46	3.05	0	4.97	1.63
6065045122	7.46	7.53	**5-10%**	Riverside	1514	5.48	34.48	60.04	7.2	88.24	0.59	0	3.96	0
6065045123	5.91	4.53	**1-5% (lowest scores)**	Riverside	2428	2.39	56.22	41.39	19.19	71.38	0	0	5.97	3.46
6065045124	4.55	2.32	**1-5% (lowest scores)**	Riverside	2157	9.87	66.94	23.18	25.54	64.63	0	0	9.46	0.37
6065045125	10.51	14.16	**10-15%**	Riverside	3159	5.51	40.2	54.29	4.94	88.73	1.23	0	3.17	1.93
6065045207	34.18	66.24	**65-70%**	Riverside	5449	15.34	71.26	13.4	80.8	16.72	0.07	0	1.21	1.19
6065045209	30.96	60.53	**60-65%**	Riverside	5946	11.44	75.41	13.15	79.1	15.96	4.1	0	0.45	0.39
6065045212	18.40	33.66	**30-35%**	Riverside	2601	6.23	44.18	49.6	26.45	61.13	11.15	0	0.77	0.5
6065045213	28.81	56.61	**55-60%**	Riverside	6526	10.5	73.17	16.33	65.43	22.53	7.37	0	3.39	1.29
6065045214	13.71	22.26	**20-25%**	Riverside	5112	9.74	64.28	25.98	23.55	69.91	1.72	0	3.35	1.47
6065045215	15.80	27.34	**25-30%**	Riverside	9761	14.12	72.67	13.22	33.03	52.88	0.7	0	8.04	5.35
6065045216	14.24	23.68	**20-25%**	Riverside	2407	2.04	33.65	64.31	8.31	85.79	1.87	0	3.12	0.91
6065045217	31.46	61.41	**60-65%**	Riverside	8275	20.1	69.87	10.03	76.42	15.84	6.42	0	0.75	0.57

6065045222	18.70	34.52	**30-35%**	Riverside	2686	8.71	70.48	20.81	41.81	43.04	1.12	0	13.29	0.74
6065045224	22.33	42.88	**40-45%**	Riverside	5878	13.35	71.42	15.23	51.6	40.44	1.29	0.88	4.39	1.4
6065045226	17.41	31.32	**30-35%**	Riverside	8410	17.57	76.12	6.3	94.93	3.94	1.13	0	0	0
6065045228	7.78	8.12	**5-10%**	Riverside	6517	12.57	62.24	25.2	38.67	57.74	0.34	0	2.42	0.83
6065045233	18.48	33.88	**30-35%**	Riverside	4367	12.48	74.86	12.66	41.88	50.79	2.34	0	2.43	2.56
6065045302	36.12	69.36	**65-70%**	Riverside	4027	7.8	74.3	17.9	89.07	9.29	0	0	0.32	1.32
6065045303	50.13	88.02	**85-90%**	Riverside	2639	17.2	73.32	9.47	92.84	4.13	0	0	3.03	0
6065045304	14.10	23.30	**20-25%**	Riverside	10800	12.24	77.04	10.72	61.36	30.54	2.87	0.96	2.36	1.91
6065045501	28.30	55.46	**55-60%**	Riverside	5936	13.51	78.17	8.32	86.81	6.18	6.13	0	0.1	0.77
6065045502	46.86	84.24	**80-85%**	Riverside	3788	10.19	74.66	15.15	81.31	11.17	3.56	0	2.19	1.77
6065045604	44.88	81.88	**80-85%**	Riverside	11044	16.29	76.15	7.56	97.39	2.45	0	0	0.01	0.14
6065045605	34.29	66.35	**65-70%**	Riverside	6734	13.26	64.14	22.6	72.57	23.69	0.73	1.01	1.59	0.42
6065045606	13.04	20.63	**20-25%**	Riverside	2648	6.42	61.93	31.65	31.42	63.78	1.36	0	1.47	1.96
6065045608	5.83	4.37	**1-5% (lowest scores)**	Riverside	2686	2.64	38.42	58.94	3.61	89.61	0.6	0.3	4.84	1.04
6065045609	37.72	71.65	**70-75%**	Riverside	4318	15.03	74.62	10.35	95	4.47	0.53	0	0	0
6065045703	40.75	76.26	**75-80%**	Riverside	6332	9.74	81.92	8.34	98.15	1.18	0	0	0.38	0.28
6065045704	29.83	58.35	**55-60%**	Riverside	2723	12.12	73.96	13.92	98.6	1.4	0	0	0	0
6065045705	25.93	50.83	**50-55%**	Riverside	9353	15.28	80.32	4.41	97.89	1.05	0.28	0.18	0.6	0
6065045706	48.71	86.38	**85-90%**	Riverside	4821	10.48	77.64	11.89	99	1	0	0	0	0
6065045707	37.36	71.15	**70-75%**	Riverside	6493	9.03	79.04	11.94	98.55	0.94	0.51	0	0	0
6065045900	34.59	66.88	**65-70%**	Riverside	1645	15.68	65.29	19.03	49.36	41.4	4.86	0	0.85	3.53
6065046101	27.90	54.75	**50-55%**	Riverside	3320	22.74	63.37	13.89	55.21	28.13	8.58	0	2.47	5.6
6065046102	37.88	71.90	**70-75%**	Riverside	1881	25.04	67.78	7.18	70.23	17.65	8.56	0	0.27	3.3
6065046103	17.35	31.19	**30-35%**	Riverside	3532	16.39	71.35	12.26	52.1	40.09	1.19	0	4.76	1.87
6065046200	54.08	91.73	**90-95%**	Riverside	2871	14.04	71.58	14.39	67.64	15.15	13.97	0	0	3.24
6065046401	28.19	55.30	**55-60%**	Riverside	3575	8.22	73.62	18.15	44.25	50.94	1.15	0	3.36	0.31
6065046402	29.99	58.62	**55-60%**	Riverside	5762	15.45	75.1	9.46	47.85	45.66	2.1	0.17	1.84	2.38
6065046403	22.33	42.85	**40-45%**	Riverside	7457	18.09	71.57	10.34	55.18	34.65	0.67	0	5.69	3.81
6065046404	30.79	60.26	**60-65%**	Riverside	6661	19.44	73.04	7.52	49.03	37.85	3.68	0.02	6.01	3.42
6065046405	20.71	39.30	**35-40%**	Riverside	3710	11.32	72.29	16.39	48.03	44.93	2.67	0	3.26	1.11
6065046500	44.96	81.95	**80-85%**	Riverside	9412	3.7	95.6	0.7	35.23	19.2	7.15	0.27	31.76	6.39
6065046601	28.17	55.26	**55-60%**	Riverside	3385	1.98	92.58	5.44	34.33	28.21	25.32	0.21	4.37	7.56
6065046602	16.47	28.97	**25-30%**	Riverside	3963	11.81	75.07	13.12	33.84	62.02	1.44	0.86	0.33	1.51
6065046700	66.15	98.12	**95-100% (highest scores)**	Riverside	4721	20.55	66.62	12.84	72.53	16.78	8.58	0	1.5	0.61
6065046800	26.95	52.91	**50-55%**	Riverside	6788	10.78	81.78	7.44	50.74	20.18	22.33	0.24	5.58	0.93
6065046900	29.18	57.22	**55-60%**	Riverside	1631	15.45	59.66	24.89	61.99	36.05	0.92	0	0	1.04
6065047000	32.99	64.06	**60-65%**	Riverside	1675	14.03	68	17.97	41.19	48.48	4.9	0.42	3.7	1.31
6065047201	11.42	16.43	**15-20%**	Riverside	1848	6.17	41.29	52.54	37.88	61.58	0	0	0.54	0
6065047202	15.77	27.28	**25-30%**	Riverside	1656	4.23	61.41	34.36	29.35	68.12	0	0	2.05	0.48
6065047900	11.95	17.76	**15-20%**	Riverside	12628	10.73	78.73	10.54	20.6	49.82	7.16	0.16	17.33	4.93
6065048100	10.77	14.89	**10-15%**	Riverside	7365	11.01	80.27	8.72	27.88	46.4	7.62	0.08	16.88	1.15
6065048200	31.75	61.96	**60-65%**	Riverside	4522	8.49	80.76	10.75	45.44	31.11	1.75	0	18.73	2.96
6065048300	23.89	46.47	**45-50%**	Riverside	6632	17.63	75.5	6.88	57.1	10.54	22.65	0	6.68	3.03
6065048700	24.66	48.08	**45-50%**	Riverside	4872	11.35	82.33	6.32	50.18	9.73	20.3	0	13.75	6.03
6065048800	37.92	72.00	**70-75%**	Riverside	4917	15.5	72.91	11.59	49.97	16.55	27.39	0	5.35	0.73
6065048901	22.60	43.44	**40-45%**	Riverside	4000	15.73	77.55	6.73	66.65	13.98	11.3	0	6.33	1.75
6065048902	35.34	68.05	**65-70%**	Riverside	7835	14.37	78.66	6.97	71.22	11.81	11.14	0	4.13	1.7
6065049000	16.40	28.79	**25-30%**	Riverside	10135	16.73	73.06	10.2	47.08	19.31	23.5	0	6.95	3.16
6065049100	13.80	22.45	**20-25%**	Riverside	5339	6.44	54.19	39.37	38.17	56	3.47	0	1.91	0.45
6065049400	14.71	24.81	**20-25%**	Riverside	3067	8.58	40.98	50.44	41.47	56.54	0.85	0	1.14	0
6065049500	33.76	65.43	**65-70%**	Riverside	7220	13.05	79.74	7.22	89.78	9.65	0.47	0	0	0.1
6065049600	20.35	38.40	**35-40%**	Riverside	8220	16.03	73.1	10.86	29.4	49.66	4.76	0.15	11.97	4.06
6065049700	15.27	26.15	**25-30%**	Riverside	9342	14.58	73.09	12.33	21.45	64.77	1.65	0.29	7.87	3.97
6065049800	30.89	60.43	**60-65%**	Riverside	4621	16.36	75.09	8.55	44.34	44.75	0.39	0	7.01	3.51
6065050300	24.02	46.80	**45-50%**	Riverside	13390	19.37	73.41	7.22	30.97	38.13	8.18	1.01	15.16	6.56
6065050400	18.36	33.61	**30-35%**	Riverside	10943	18.09	73.58	8.32	37.45	46.5	2.66	0	8.79	4.6
6065050500	24.66	48.07	**45-50%**	Riverside	15912	15.95	76.67	7.38	38.81	35.77	8.17	0.48	11.92	4.85
6065050600	24.42	47.66	**45-50%**	Riverside	7748	12.15	71.27	16.58	28.02	55.82	10.03	0.53	2.08	3.52

6065050700	16.84	30.07	**30-35%**	Riverside	12772	15.42	75.73	8.85	28.67	44.39	9.47	0	8.64	8.84
6065050900	28.37	55.66	**55-60%**	Riverside	4682	12	80.99	7.01	30.2	39.02	7.75	2.16	13.61	7.26
6065051100	20.12	37.75	**35-40%**	Riverside	7242	14.79	77.15	8.06	43.36	12.43	31.57	0	11.31	1.34
6065051200	33.59	65.15	**65-70%**	Riverside	5113	10.68	79.01	10.31	50.93	39.33	1.8	0.45	6.32	1.17
6065051300	25.31	49.47	**45-50%**	Riverside	9719	13.97	69.26	16.77	44.03	44.67	3.21	2.01	3.92	2.17
6065051400	4.99	3.05	**1-5% (lowest scores)**	Riverside	6755	0	13.81	86.19	4.01	89.89	3.57	0	0.34	2.19
6065940100	NA	NA	**NA**	Riverside	171	0	48.54	51.46	14.04	76.02	0	0	9.94	0
6065940400	42.10	78.20	**75-80%**	Riverside	6818	11.07	80.8	8.13	95.57	2.17	1.04	0.31	0.37	0.54
6065940500	10.01	12.97	**10-15%**	Riverside	2150	0.14	51.12	48.74	5.95	89.12	1.02	0.6	1.91	1.4
6065940600	8.17	8.88	**5-10%**	Riverside	3183	3.49	45.93	50.58	12.22	76.94	1.6	0.91	5.22	3.11
6065940700	11.70	17.07	**15-20%**	Riverside	2798	4.57	50.64	44.78	15.83	76.23	1.72	0.82	3.97	1.43
6065940800	8.79	10.17	**10-15%**	Riverside	2748	1.46	47.23	51.31	10.88	83.15	0.91	0.51	2.73	1.82
6065940900	9.20	11.04	**10-15%**	Riverside	2097	1.48	43.59	54.94	11.11	81.45	2.24	0.24	3.24	1.72
6065941000	14.42	24.08	**20-25%**	Riverside	3832	3.11	51.72	45.17	12.81	75.99	3.91	3.29	1.49	2.51
6065941100	13.59	21.95	**20-25%**	Riverside	2072	1.79	32.87	65.35	6.76	90.3	0.29	0.1	1.45	1.11
6065941200	13.25	21.07	**20-25%**	Riverside	2735	3.62	59.01	37.37	15.06	73.64	3.07	0.18	5.3	2.74
6065941300	12.90	20.22	**20-25%**	Riverside	3366	4.72	63.84	31.43	20.53	65.51	7.13	0.59	4.72	1.52
6065941400	18.59	34.15	**30-35%**	Riverside	3872	6.79	64.82	28.38	28.18	58.57	5.99	0.36	4.47	2.43
6065941500	18.59	34.18	**30-35%**	Riverside	5080	19.9	68.15	11.95	45.18	37.32	8.84	6.52	0.37	1.77
6065980004	NA	NA	**NA**	Riverside	0	NA	NA	NA	NA	NA	NA	NA	NA	NA
6065981000	NA	NA	**NA**	Riverside	6196	0	99	1	57.65	16.87	18.33	1.28	3.39	2.49
6067000100	8.81	10.21	**10-15%**	Sacramento	3871	12.71	67.24	20.05	10.77	82.54	0.34	0.31	2.35	3.69
6067000200	3.77	1.16	**1-5% (lowest scores)**	Sacramento	3755	12.65	68.84	18.51	12.94	74.59	0.11	0	5.06	7.3
6067000300	16.97	30.45	**30-35%**	Sacramento	3418	10.8	69.95	19.25	13.14	75.57	1.38	0.23	7.55	2.14
6067000400	24.40	47.62	**45-50%**	Sacramento	3933	5.95	84.57	9.48	20.85	63.13	6	1.2	2.42	6.41
6067000500	43.69	80.36	**80-85%**	Sacramento	3461	11.85	79.08	9.07	26.06	53.54	7.19	0.92	3.73	8.55
6067000600	45.68	82.83	**80-85%**	Sacramento	1123	1.87	86.38	11.75	27.16	55.92	9.62	0	4.19	3.12
6067000700	59.74	95.55	**95-100% (highest scores)**	Sacramento	2567	0	78.18	21.82	18.89	28.28	29.88	1.52	16.17	5.26
6067000800	35.17	67.85	**65-70%**	Sacramento	1703	0	73.4	26.6	10.04	69.88	6.81	0	8.87	4.4
6067001101	42.20	78.30	**75-80%**	Sacramento	2583	6.7	82.85	10.45	14.79	50.75	20.75	0.66	7.28	5.77
6067001200	31.01	60.64	**60-65%**	Sacramento	3527	4.34	84.21	11.45	17.78	64.42	6.52	0.88	9.3	1.11
6067001300	32.06	62.49	**60-65%**	Sacramento	3231	3.62	88.58	7.8	20.3	63.2	4.36	0.62	6.99	4.52
6067001400	25.47	49.80	**45-50%**	Sacramento	2362	1.78	75.49	22.73	16.47	67.53	6.48	0	4.91	4.61
6067001500	15.48	26.60	**25-30%**	Sacramento	4723	9.44	68.35	22.21	9.78	76.18	2.14	0	6.39	5.5
6067001600	9.86	12.56	**10-15%**	Sacramento	6023	13.27	70.99	15.74	19.29	66.43	1.41	0.28	6.64	5.94
6067001700	36.36	69.69	**65-70%**	Sacramento	5513	9.43	71.98	18.59	17.43	66.72	1.31	0	7.93	6.62
6067001800	34.08	66.01	**65-70%**	Sacramento	5152	7.76	83.07	9.16	23.35	49.42	10.85	0	10.73	5.65
6067001900	28.76	56.47	**55-60%**	Sacramento	3123	6.72	83.61	9.67	18.67	64.43	2.63	0	8.68	5.6
6067002000	50.79	88.63	**85-90%**	Sacramento	2617	3.06	81.7	15.25	21.28	39.05	4.55	0.31	25.45	9.36
6067002100	36.12	69.38	**65-70%**	Sacramento	2096	4.77	87.26	7.97	19.23	45.8	6.92	1.86	21.61	4.58
6067002200	42.65	78.90	**75-80%**	Sacramento	5103	26.1	66.45	7.45	27.45	32.49	14.58	0	18.18	7.29
6067002300	16.40	28.78	**25-30%**	Sacramento	3358	8.99	74.24	16.77	19.62	69.83	1.25	0	3.6	5.69
6067002400	17.69	32.01	**30-35%**	Sacramento	4772	13.5	64.75	21.75	11.13	72.69	3.65	0	6.75	5.78
6067002500	12.86	20.11	**20-25%**	Sacramento	1613	7.01	59.76	33.23	14.07	73.96	2.54	0.31	6.45	2.67
6067002600	15.44	26.51	**25-30%**	Sacramento	2448	6.82	77.08	16.09	14.62	63.64	4.62	0	9.88	7.23
6067002700	37.93	72.01	**70-75%**	Sacramento	3404	8.96	83.84	7.2	31.61	37.4	17.22	2	4.52	7.26
6067002800	32.29	62.90	**60-65%**	Sacramento	3814	13.11	75.64	11.25	40.43	22.76	20.98	3.38	5.14	7.32
6067002900	36.79	70.28	**70-75%**	Sacramento	5016	9.39	73.98	16.63	22.93	66.73	2.89	0	3.79	3.67
6067003000	28.72	56.34	**55-60%**	Sacramento	7450	9.21	72.62	18.17	33.49	38.46	13.99	0	8.39	5.68
6067003101	33.54	65.08	**65-70%**	Sacramento	3479	13.57	74.39	12.04	57.86	29.55	3.62	0.8	6.26	1.9
6067003102	24.46	47.72	**45-50%**	Sacramento	3158	9.37	79.23	11.4	42.59	31.89	9.72	0	6.52	9.28
6067003202	40.56	75.97	**75-80%**	Sacramento	5098	12.91	73.03	14.06	35.45	21.54	6.43	0.24	32.27	4.08
6067003203	29.83	58.37	**55-60%**	Sacramento	2680	9.93	77.87	12.2	27.54	8.06	7.13	0	52.2	5.07
6067003204	42.12	78.24	**75-80%**	Sacramento	4965	12.85	77.14	10.01	36.46	8.52	7.53	0	42.26	5.24
6067003300	22.06	42.23	**40-45%**	Sacramento	4548	12.25	65.94	21.81	19.46	58	2.88	0.4	15.77	3.5
6067003400	23.86	46.38	**45-50%**	Sacramento	3929	9.9	64.21	25.88	25.88	44.49	8.25	1.32	14.84	5.22
6067003501	34.16	66.19	**65-70%**	Sacramento	2393	11.07	72.88	16.05	26.95	46.97	4.3	0	17.51	4.26
6067003502	25.03	48.80	**45-50%**	Sacramento	2638	12.36	68.27	19.37	28.01	43.14	4.78	0	19.22	4.85

6067003600	43.76	80.50	80-85%	Sacramento	2767	13.62	75.61	10.77	47.71	34.12	5.28	0.87	10.55	1.48
6067003700	43.82	80.57	80-85%	Sacramento	4496	21.98	69.64	8.39	51.56	16.3	9.81	0	18.5	3.83
6067003800	34.54	66.79	65-70%	Sacramento	5674	11.51	74.3	14.19	41.54	15.19	24.53	0.04	16.62	2.08
6067003900	23.29	45.11	45-50%	Sacramento	3267	7.56	69.24	23.2	27.73	47.63	2.72	0	17.75	4.16
6067004001	22.93	44.29	40-45%	Sacramento	5832	10.89	65.45	23.66	28.05	28.57	9.28	0	25.8	8.3
6067004004	12.61	19.43	15-20%	Sacramento	5986	6.41	67.84	25.74	16.64	41.55	9.41	0	26.11	6.3
6067004005	16.67	29.56	25-30%	Sacramento	4367	7.9	60.22	31.88	9.66	40.23	17.43	0	26.86	5.82
6067004006	17.96	32.60	30-35%	Sacramento	5346	13.51	69.4	17.1	21.23	35.88	12.51	0	23.57	6.81
6067004008	10.00	12.93	10-15%	Sacramento	3666	11.46	69.8	18.74	18.82	43.86	2.97	0	26.19	8.16
6067004009	12.55	19.28	15-20%	Sacramento	4991	9.18	73.69	17.13	23.72	30.39	8.9	0.38	29.81	6.79
6067004010	21.89	41.97	40-45%	Sacramento	5981	17.52	63.7	18.78	18.43	29.78	16.94	0.2	25	9.66
6067004011	10.88	15.20	15-20%	Sacramento	3111	8.33	68.47	23.21	9.16	40.79	6.46	0.29	41.01	2.28
6067004012	15.55	26.79	25-30%	Sacramento	3655	12.31	69.66	18.03	23.12	33.63	11.52	0	28.65	3.09
6067004100	31.68	61.79	60-65%	Sacramento	5107	15.49	69.98	14.53	29.76	12.79	16.19	0	39.98	1.27
6067004201	30.61	59.87	55-60%	Sacramento	5707	14.44	71.75	13.81	43.18	13.88	21.57	0	17.35	4.03
6067004202	29.37	57.55	55-60%	Sacramento	6353	16.87	65.61	17.52	41.19	12.67	20.53	0.61	21.89	3.1
6067004203	29.14	57.12	55-60%	Sacramento	5583	21.26	69.37	9.37	33.15	7.15	18.99	0	32.99	7.72
6067004300	39.23	73.80	70-75%	Sacramento	9867	20.71	68.02	11.27	20.48	7.37	19.77	0	42.5	9.88
6067004401	37.28	70.94	70-75%	Sacramento	3788	7.31	76.32	16.37	34.32	21.15	24.45	0	16.71	3.38
6067004402	33.80	65.52	65-70%	Sacramento	4295	14.39	74.18	11.43	49.45	13.41	11.53	0	21.42	4.19
6067004501	46.21	83.50	80-85%	Sacramento	3463	16.55	73.32	10.14	48.69	8.69	10.83	0	28.91	2.89
6067004502	56.20	93.34	90-95%	Sacramento	5407	18.31	75.07	6.62	47.73	12.1	13.15	0.55	18.85	7.62
6067004601	41.73	77.67	75-80%	Sacramento	8155	16.31	74.96	8.73	36.25	15.02	15.01	0	20.06	13.66
6067004602	49.10	86.85	85-90%	Sacramento	5725	24.26	67.16	8.58	56.3	18.78	5.73	0.44	10.03	8.73
6067004701	48.15	85.68	85-90%	Sacramento	3318	21.19	68.17	10.64	34.72	15.55	11.63	0.6	22.94	14.56
6067004702	50.47	88.35	85-90%	Sacramento	4946	20.44	70.22	9.34	39	12.35	18.94	0.81	24.76	4.12
6067004801	37.02	70.61	70-75%	Sacramento	5931	12.59	72.01	15.39	21.26	17.69	8.58	0	49.3	3.17
6067004802	43.60	80.24	80-85%	Sacramento	5177	12.3	76.57	11.13	35.87	12.44	13.56	0.44	31.58	6.1
6067004903	32.74	63.60	60-65%	Sacramento	7493	15.71	77.07	7.22	25.44	12.28	19.28	0.37	32.69	9.93
6067004904	43.83	80.60	80-85%	Sacramento	5824	13.89	72.89	13.22	38.55	22.77	14.37	0	19.97	4.34
6067004905	39.69	74.50	70-75%	Sacramento	7492	18.57	66.18	15.26	30.37	16.91	25.8	0.23	24.42	2.28
6067004906	24.35	47.49	45-50%	Sacramento	3290	14.95	73.34	11.7	35.78	13.13	27.02	0	20.91	3.16
6067005001	44.67	81.58	80-85%	Sacramento	8176	11.25	70.98	17.77	33.65	14.9	9.74	1.52	38.94	1.26
6067005002	54.96	92.52	90-95%	Sacramento	7108	21.51	65.04	13.45	42.29	20.82	11.82	2.24	19.81	3.02
6067005101	44.68	81.59	80-85%	Sacramento	3787	9.8	75.57	14.63	21.79	18.09	9.16	0	46.1	4.86
6067005102	34.42	66.54	65-70%	Sacramento	4654	13.39	68.2	18.41	31.2	27.93	8.34	0	25.92	6.62
6067005201	41.63	77.52	75-80%	Sacramento	3707	2.48	96.95	0.57	38.04	26.95	17.99	0.19	11.38	5.45
6067005202	26.44	51.79	50-55%	Sacramento	3831	8.67	72.64	18.69	31.82	53.35	2.38	0	7.28	5.17
6067005204	25.01	48.73	45-50%	Sacramento	4476	14.57	64.68	20.76	16.18	64.3	7.6	0.47	7.42	4.04
6067005205	53.50	91.33	90-95%	Sacramento	2400	3.46	78.58	17.96	40.13	39.54	7.58	0	10.67	2.08
6067005301	68.71	98.80	95-100% (highest scores)	Sacramento	1598	16.96	76.41	6.63	24.53	28.6	40.05	0	3.32	3.5
6067005402	33.57	65.10	65-70%	Sacramento	2729	10.96	75.16	13.89	33.02	46.02	3.81	0.26	12.75	4.14
6067005403	23.12	44.81	40-45%	Sacramento	2518	0.36	64.3	35.35	26.73	60.25	2.82	0	9.45	0.75
6067005404	17.13	30.64	30-35%	Sacramento	5440	8.35	69.17	22.48	11.62	72.52	2.21	0.92	8.22	4.52
6067005502	55.71	93.04	90-95%	Sacramento	5779	17.91	74.42	7.67	48.42	29	10.76	0	5.9	5.92
6067005505	42.80	79.19	75-80%	Sacramento	5997	15.72	71.87	12.41	28.41	47.62	13.01	0	0.9	10.06
6067005506	35.41	68.20	65-70%	Sacramento	3843	14.23	80.51	5.26	32.76	33.67	21.52	0	5.67	6.38
6067005508	26.60	52.22	50-55%	Sacramento	3338	8.9	77.35	13.75	25.34	43.35	14.14	0.96	10.25	5.96
6067005509	29.62	58.04	55-60%	Sacramento	2122	5.75	86.9	7.35	17.81	37.51	22.71	0	18.47	3.49
6067005510	27.63	54.15	50-55%	Sacramento	5522	19.5	72.71	7.79	33.52	40.24	13	0.62	8.4	4.22
6067005601	36.42	69.76	65-70%	Sacramento	5969	13.77	65.25	20.98	6.82	53.63	16.18	0.32	13.75	9.3
6067005605	23.67	45.79	45-50%	Sacramento	3890	18.82	71.08	10.1	27.74	44.6	14.5	0	7.38	5.78
6067005606	19.39	35.93	35-40%	Sacramento	4405	10.96	72.1	16.94	19.82	63.9	2.72	0	9.24	4.31
6067005701	17.26	30.95	30-35%	Sacramento	3143	11.61	68.31	20.08	7.83	70.63	9.39	0	5.63	6.52
6067005702	12.24	18.57	15-20%	Sacramento	4864	11.64	68.22	20.15	10.16	81.19	0.76	0	5.39	2.51
6067005801	16.19	28.39	25-30%	Sacramento	5304	10.71	72.34	16.95	19.49	68.44	3.83	0	4.55	3.7
6067005803	13.14	20.79	20-25%	Sacramento	3606	8.1	64.34	27.57	7.49	77.87	0.25	0	10.18	4.22
6067005804	6.18	5.06	5-10%	Sacramento	2425	11.84	58.47	29.69	7.59	80.82	0	0	6.89	4.7

6067005901	11.16	15.83	15-20%	Sacramento	6428	8.42	59.89	31.69	10.49	74.7	2.85	0.22	9.46	2.29
6067005903	23.22	44.96	40-45%	Sacramento	2837	12.72	77.58	9.69	7.97	60.06	15.4	0	2.11	14.45
6067005904	30.55	59.71	55-60%	Sacramento	4884	5.32	79.71	14.97	9.52	73.89	4.28	0.12	5.43	6.76
6067006002	40.04	74.99	70-75%	Sacramento	4566	14.3	69.49	16.21	17.06	62	6.81	2.26	5.43	6.44
6067006003	38.27	72.57	70-75%	Sacramento	4960	12.96	73.79	13.25	23.67	50.36	9.33	0.22	6.76	9.66
6067006004	17.84	32.35	30-35%	Sacramento	2438	8.7	73.67	17.64	12.14	72.15	6.19	0.29	4.22	5
6067006101	44.21	81.11	80-85%	Sacramento	4886	19.12	63.1	17.79	23.15	57.39	9.27	0	1.58	8.62
6067006102	41.18	76.89	75-80%	Sacramento	3367	14.2	69.91	15.89	21.86	51.2	14.49	0	7.19	5.26
6067006201	48.19	85.73	85-90%	Sacramento	7359	20.89	66.1	13.02	28.97	37.78	12.34	1.03	5.87	14.01
6067006202	52.56	90.57	90-95%	Sacramento	3644	13.72	74.7	11.58	34.11	33.7	19.51	0.96	5.71	6.01
6067006300	51.06	88.91	85-90%	Sacramento	5161	13.52	75.61	10.87	49.54	32.84	9.88	0.89	5.25	1.59
6067006400	57.44	94.13	90-95%	Sacramento	5521	14.04	77.27	8.69	53.03	28.53	8.86	0.25	5.54	3.79
6067006500	46.71	84.09	80-85%	Sacramento	7004	17.26	75.36	7.38	30.63	15.35	20.66	0.44	27.63	5.3
6067006600	44.08	80.98	80-85%	Sacramento	7385	14.41	77.37	8.22	38.98	26.23	14.37	0.88	15.35	4.2
6067006701	43.63	80.30	80-85%	Sacramento	9349	14.59	75.02	10.39	40.99	17.01	13.52	0	25.77	2.72
6067006702	47.74	85.16	85-90%	Sacramento	7927	17.79	73.46	8.75	35.16	17.77	17.37	0	23.76	5.94
6067006800	43.19	79.80	75-80%	Sacramento	7168	15.83	77.08	7.09	62.33	13.98	7.49	2.27	8.75	5.18
6067006900	56.37	93.51	90-95%	Sacramento	4858	11.65	75.69	12.66	34.54	38.31	15.48	0	8.11	3.56
6067007001	45.71	82.88	80-85%	Sacramento	4205	17.22	75.67	7.11	55.12	19.98	8.68	2.43	11.34	2.45
6067007004	32.05	62.48	60-65%	Sacramento	7953	14.64	79.99	5.37	43.2	18.23	19.43	0.91	13.98	4.25
6067007007	43.17	79.74	75-80%	Sacramento	5756	18.82	69.63	11.55	57.12	18.78	13.55	0.28	6.93	3.34
6067007010	36.42	69.78	65-70%	Sacramento	3878	12.17	80.25	7.58	20.32	42.08	11.42	0	22.48	3.69
6067007011	33.96	65.76	65-70%	Sacramento	6865	15.72	78.31	5.97	41.7	20.64	13.37	0	17.19	7.09
6067007012	20.54	38.91	35-40%	Sacramento	3452	16.48	74.39	9.13	37.78	34.36	18.4	0	3.94	5.53
6067007013	19.47	36.12	35-40%	Sacramento	3149	13.94	78.88	7.18	38.96	18.61	12.29	1.05	20.96	8.13
6067007014	24.54	47.84	45-50%	Sacramento	7336	13.09	76.8	10.11	41.92	25.74	16.98	0.16	7.66	7.54
6067007015	24.63	48.02	45-50%	Sacramento	6158	14.6	72.7	12.7	26.78	31.28	17.65	0.28	19.25	4.77
6067007016	27.36	53.67	50-55%	Sacramento	6040	18.38	71.44	10.18	19.78	26.84	13.69	0	34.37	5.31
6067007017	25.60	50.10	50-55%	Sacramento	3309	17.32	73.07	9.61	30.19	29.95	15.5	0	20.28	4.08
6067007018	26.74	52.48	50-55%	Sacramento	6096	16.22	76	7.78	15.03	27.33	12.81	0.26	41.09	3.48
6067007019	22.87	44.13	40-45%	Sacramento	1461	17.25	78.58	4.18	30.73	8.35	39.22	0	17.73	3.97
6067007020	26.10	51.08	50-55%	Sacramento	4336	13.26	76.38	10.36	23.02	49.52	8.76	0	12.47	6.23
6067007101	NA	NA	NA	Sacramento	312	26.92	65.71	7.37	0	100	0	0	0	0
6067007102	14.87	25.20	25-30%	Sacramento	8662	12.1	58.13	29.77	11.83	39.4	16.39	1.73	27.76	2.87
6067007103	12.82	19.98	15-20%	Sacramento	3869	16.08	78.44	5.48	12.79	34.53	15.04	1.19	29.31	7.13
6067007104	6.90	6.56	5-10%	Sacramento	8397	13.91	80.27	5.82	15.47	35.58	13.14	0	25.82	9.99
6067007105	10.46	13.99	10-15%	Sacramento	7100	12.85	78.15	9	20.46	30.55	11.44	0	33.89	3.66
6067007106	10.60	14.40	10-15%	Sacramento	8420	10.38	81.15	8.47	31	30.37	9.87	1.27	20.62	6.88
6067007107	15.03	25.62	25-30%	Sacramento	3808	14.34	73.82	11.84	14.65	36.03	15.36	0.63	26.02	7.3
6067007202	29.09	57.02	55-60%	Sacramento	4630	16.2	70.28	13.52	21.6	63.26	1.38	0	9.59	4.17
6067007204	25.83	50.69	50-55%	Sacramento	4917	16.17	74.29	9.54	27.8	36.3	13.59	0.33	19.16	2.83
6067007206	19.13	35.46	35-40%	Sacramento	4274	9.94	72.48	17.57	14.6	74.99	2.71	1.92	2.5	3.28
6067007207	13.15	20.81	20-25%	Sacramento	4835	11.87	77.95	10.18	22.25	58.84	0.48	0.17	15.24	3.02
6067007208	18.48	33.89	30-35%	Sacramento	4608	15.34	72.35	12.3	17.27	68.75	3.43	0	9.2	1.35
6067007209	18.17	33.09	30-35%	Sacramento	3618	16.92	69.29	13.79	23.55	64.93	4.42	0.25	3.79	3.07
6067007301	45.69	82.84	80-85%	Sacramento	5067	16.74	73.22	10.05	29.82	40.81	17.58	0.18	4.01	7.6
6067007402	29.49	57.79	55-60%	Sacramento	6213	12.23	72.33	15.44	38.37	44.29	8.13	0.11	4.64	4.46
6067007403	30.72	60.14	60-65%	Sacramento	5422	15.44	74.27	10.29	28.03	43.03	19.31	0.37	0.9	8.35
6067007406	28.37	55.67	55-60%	Sacramento	8862	14.08	76	9.92	26.4	48.09	14.83	0	7.82	2.85
6067007413	54.70	92.28	90-95%	Sacramento	7438	22.34	66.08	11.58	22.65	52.12	9.2	0.23	9.8	6
6067007414	20.55	38.94	35-40%	Sacramento	4786	15.57	75.87	8.57	28.31	45.97	8.61	0.23	7.96	8.92
6067007415	24.55	47.87	45-50%	Sacramento	3529	15.73	69.74	14.54	14.45	64.52	11.56	0	6.01	3.46
6067007416	21.67	41.45	40-45%	Sacramento	4223	13.33	73.05	13.62	29.48	52.29	4.81	0	7.34	6.09
6067007417	12.82	19.99	15-20%	Sacramento	3285	13.21	74.19	12.6	16.13	57.44	6.15	0	15.49	4.78
6067007421	15.61	26.93	25-30%	Sacramento	9610	14.09	77.68	8.23	6.41	65.19	8.36	0.06	16.19	3.79
6067007422	29.49	57.82	55-60%	Sacramento	2709	17.02	77.37	5.61	30.23	57.66	6.5	0	2.55	3.06
6067007423	27.43	53.85	50-55%	Sacramento	5710	21.37	72.43	6.2	22.77	41.59	23.96	0.44	2.63	8.62
6067007424	36.92	70.46	70-75%	Sacramento	3852	15.26	76.71	8.02	24.69	48.55	12.98	0	5.51	8.28

6067007426	16.97	30.41	**30-35%**	Sacramento	2402	12.28	78.27	9.45	11.74	67.15	14.57	0	2.08	4.45
6067007427	20.32	38.29	**35-40%**	Sacramento	6738	16.27	74.24	9.5	23.39	50.52	8.67	0.18	13.44	3.81
6067007428	18.14	33.03	**30-35%**	Sacramento	3515	16.39	75.59	8.02	15.31	62.99	4.41	0	10.53	6.77
6067007429	21.49	41.11	**40-45%**	Sacramento	5232	13.13	79.11	7.76	23.28	37.6	23.7	1.19	7.05	7.19
6067007430	14.23	23.58	**20-25%**	Sacramento	8936	16.69	77.97	5.35	16.17	60.26	11.28	0.08	10.14	2.07
6067007431	13.20	20.90	**20-25%**	Sacramento	3424	16.3	71.9	11.8	19.28	51.9	7.24	0.35	14.43	6.8
6067007432	11.39	16.36	**15-20%**	Sacramento	5118	14.83	78.55	6.62	14.99	57.97	8.89	0	7.82	10.34
6067007433	19.87	37.17	**35-40%**	Sacramento	8155	19.55	71.1	9.36	13.81	57.88	8.58	0	14.79	4.94
6067007501	42.76	79.08	**75-80%**	Sacramento	6866	16.59	70.81	12.6	20.93	55.67	12.19	0.17	3.71	7.33
6067007503	36.63	70.05	**70-75%**	Sacramento	5549	16.54	74.39	9.06	19.7	43.56	8.43	4.51	14.83	8.97
6067007504	32.24	62.80	**60-65%**	Sacramento	2081	9.95	69.58	20.47	21.29	67.85	4.47	1.3	2.84	2.26
6067007601	25.65	50.23	**50-55%**	Sacramento	6501	9.61	69.17	21.21	15.07	66.01	4.88	0.23	7.05	6.77
6067007602	24.32	47.40	**45-50%**	Sacramento	4661	11.26	67.35	21.39	10.75	69.45	7.98	0.21	4.05	7.55
6067007701	32.38	63.14	**60-65%**	Sacramento	7016	12.97	73.89	13.14	17.46	55.13	9.25	0.41	5.97	11.77
6067007702	13.75	22.35	**20-25%**	Sacramento	4461	7.78	66.98	25.24	14.12	71.64	3.23	0.38	6.54	4.08
6067007801	21.95	42.03	**40-45%**	Sacramento	5634	10.9	68.19	20.91	9.27	74.85	3.53	0	6.21	6.14
6067007802	16.63	29.41	**25-30%**	Sacramento	4299	8.82	65.78	25.4	13.84	73.2	1.86	0	3.77	7.33
6067007903	19.64	36.61	**35-40%**	Sacramento	4730	14.1	64.31	21.59	8.67	78.46	4	0.25	4.61	4.02
6067007904	9.71	12.25	**10-15%**	Sacramento	5585	11.96	72.62	15.42	13.72	72.43	0.95	0.36	3.88	8.67
6067007905	10.43	13.92	**10-15%**	Sacramento	4160	8.89	67.38	23.73	11.68	77.86	0.22	0	6.66	3.58
6067007906	24.09	46.94	**45-50%**	Sacramento	3814	12.03	68.64	19.32	15.55	70.58	4.01	0.6	2.75	6.5
6067008005	13.37	21.38	**20-25%**	Sacramento	4542	8.45	67.81	23.73	12.29	79.44	0	0	5.09	3.19
6067008006	12.23	18.51	**15-20%**	Sacramento	5535	10.79	65.67	23.54	10.48	68.73	2.98	0.33	3.38	14.11
6067008007	14.49	24.32	**20-25%**	Sacramento	3290	16.66	57.81	25.53	9.03	74.71	4.19	0	5.9	6.17
6067008008	9.94	12.77	**10-15%**	Sacramento	4832	7.74	68.67	23.59	9.77	72.76	3.52	0.52	6.13	7.31
6067008009	14.60	24.55	**20-25%**	Sacramento	4511	12.08	69.59	18.33	13.57	71.43	4.88	0	5.28	4.85
6067008010	15.86	27.48	**25-30%**	Sacramento	4721	10.27	67.1	22.62	15.67	77.57	0.28	0	3.13	3.35
6067008111	21.31	40.57	**40-45%**	Sacramento	6321	10.9	72.08	17.02	16.99	77.22	0.73	0	1.87	3.2
6067008113	21.70	41.54	**40-45%**	Sacramento	3657	12.85	76.54	10.61	21.74	68.2	2.6	0.52	1.04	5.91
6067008117	23.86	46.39	**45-50%**	Sacramento	2429	13.59	71.55	14.86	25.07	63.4	2.63	0	3.38	5.52
6067008119	14.09	23.27	**20-25%**	Sacramento	6326	15.81	71.78	12.41	18.86	66.68	6.21	0	2.4	5.85
6067008120	12.50	19.24	**15-20%**	Sacramento	4946	12.37	73.25	14.38	19.57	67.75	2.75	0.77	3.3	5.86
6067008122	8.05	8.64	**5-10%**	Sacramento	3591	9.38	71.26	19.35	10.25	72.24	3.87	0	7.07	6.57
6067008124	9.46	11.59	**10-15%**	Sacramento	4806	12.84	67.12	20.04	11.03	79.28	1.77	0.37	5.12	2.43
6067008125	8.45	9.54	**5-10%**	Sacramento	5104	8.68	68.97	22.36	16.32	66.54	4.7	1.27	5.78	5.39
6067008127	19.57	36.38	**35-40%**	Sacramento	5091	14.99	74.09	10.92	19.31	72.38	0.33	0.79	4.54	2.65
6067008128	26.18	51.29	**50-55%**	Sacramento	2493	8.9	73.37	17.73	25.83	65.86	0.36	0.84	3.69	3.41
6067008129	21.85	41.88	**40-45%**	Sacramento	3030	8.02	70.1	21.88	20.07	69.11	2.97	0	3.2	4.65
6067008130	20.90	39.84	**35-40%**	Sacramento	3730	9.2	75.23	15.58	23.49	60.62	3.62	1.29	5.09	5.9
6067008131	32.33	63.01	**60-65%**	Sacramento	5302	11.79	71.65	16.56	20.67	63.43	6.15	0	1.79	7.96
6067008132	20.61	39.09	**35-40%**	Sacramento	3990	9.32	65.49	25.19	10.85	70.55	8.82	0.38	4.84	4.56
6067008133	21.23	40.42	**40-45%**	Sacramento	2874	11.38	77.11	11.52	14.34	67.64	8.04	0.38	6.4	3.2
6067008134	21.29	40.51	**40-45%**	Sacramento	5252	12.95	72.52	14.53	23.31	63.48	4.59	0	5.46	3.16
6067008135	25.30	49.46	**45-50%**	Sacramento	4416	10.3	66.33	23.37	17.78	72.8	1	0	5.05	3.37
6067008136	19.25	35.73	**35-40%**	Sacramento	2332	7.72	71.01	21.27	11.41	78.04	0.9	0	8.23	1.42
6067008137	14.19	23.51	**20-25%**	Sacramento	2420	12.85	71.4	15.74	4.96	90	3.06	0	0.91	1.07
6067008138	19.37	35.88	**35-40%**	Sacramento	3843	12.13	71.77	16.11	23.81	60.42	7.68	0	6.3	1.8
6067008139	18.51	33.98	**30-35%**	Sacramento	3720	10.54	74.97	14.49	21.94	60.59	7.61	0.51	3.44	5.91
6067008140	14.44	24.16	**20-25%**	Sacramento	3059	12.59	67.9	19.52	13.86	76.69	3.73	0.98	1.21	3.53
6067008141	25.29	49.41	**45-50%**	Sacramento	7038	12.67	76.03	11.3	27.86	57.8	6.05	0.7	3.58	4.01
6067008142	16.97	30.43	**30-35%**	Sacramento	3731	13.27	78.83	7.91	24.69	64.19	1.72	0.94	5.18	3.3
6067008143	13.21	20.97	**20-25%**	Sacramento	4142	10.99	74.94	14.08	21.34	73.47	2.03	0	1.47	1.69
6067008144	8.29	9.11	**5-10%**	Sacramento	2847	16.16	68.74	15.1	12.36	73.69	1.12	0	6.92	5.9
6067008145	6.17	5.02	**5-10%**	Sacramento	7348	10.94	73.56	15.5	13.87	72.26	3.46	0	2.86	7.55
6067008203	11.17	15.85	**15-20%**	Sacramento	4478	9.51	63.06	27.42	9.67	78.14	4.31	0.8	1.03	6.05
6067008204	8.03	8.57	**5-10%**	Sacramento	4775	11.92	68.61	19.48	14.49	73.32	0.88	0.15	1.42	9.74
6067008206	14.43	24.10	**20-25%**	Sacramento	6226	13.62	73.51	12.87	15.11	74.9	0.18	0.84	5.38	3.6
6067008207	12.43	19.04	**15-20%**	Sacramento	4178	8.5	76.74	14.77	5.17	85.38	1.58	0.6	1.2	6.08

6067008208	18.48	33.85	30-35%	Sacramento	4951	14.24	73.12	12.64	15.41	73.78	0.44	0.12	2.93	7.31
6067008209	4.28	2.03	1-5% (lowest scores)	Sacramento	4658	9.92	68.66	21.43	12.07	74.43	2.1	0	6.2	5.2
6067008210	6.48	5.70	5-10%	Sacramento	5894	10.1	59.26	30.64	10.71	80.64	0.07	0	2.63	5.96
6067008211	9.87	12.58	10-15%	Sacramento	2799	7.18	67.38	25.44	8.4	84.39	0.5	1.04	0.79	4.89
6067008402	10.65	14.52	10-15%	Sacramento	5724	13.66	71.44	14.9	13.71	74.63	0.31	2.41	3.95	4.98
6067008403	9.76	12.37	10-15%	Sacramento	6561	15.15	72.78	12.07	14.04	59.38	0.53	0	19.26	6.78
6067008404	15.31	26.22	25-30%	Sacramento	3623	12.45	75.19	12.37	21.67	67.95	0.17	0.25	5.58	4.39
6067008501	3.67	1.12	1-5% (lowest scores)	Sacramento	7012	12.01	74.7	13.29	10.77	62.64	0	0	23.93	2.67
6067008504	11.91	17.68	15-20%	Sacramento	5137	13.32	77.81	8.88	14.39	62.82	3.08	0.16	13.78	5.78
6067008505	3.42	1.00	1-5% (lowest scores)	Sacramento	2248	12.77	73.67	13.57	5.43	68.59	0.27	0	19.66	6.05
6067008506	5.90	4.51	1-5% (lowest scores)	Sacramento	2743	8.31	72.58	19.1	11.99	40.14	3.5	0	39.45	4.92
6067008507	7.09	6.90	5-10%	Sacramento	4007	15.8	74.52	9.68	11.13	65.31	1.4	0.2	16.64	5.32
6067008508	11.62	16.86	15-20%	Sacramento	7614	8.87	82.09	9.05	8.73	54.61	0.59	0.09	29.62	6.36
6067008509	3.82	1.22	1-5% (lowest scores)	Sacramento	4960	17.94	72.88	9.17	7.34	64.98	0.22	0	21.23	6.23
6067008510	4.86	2.82	1-5% (lowest scores)	Sacramento	4946	12.7	77.21	10.09	15.22	68.42	0	0	10.9	5.46
6067008512	5.38	3.67	1-5% (lowest scores)	Sacramento	4552	13.6	80.05	6.35	4.7	60.46	2.66	0	30.21	1.98
6067008513	6.90	6.61	5-10%	Sacramento	3620	18.84	73.04	8.12	3.9	53.56	0.3	0	35.72	6.52
6067008600	20.65	39.18	35-40%	Sacramento	6999	7.14	62.75	30.1	12.47	75.35	5.14	0.64	3.67	2.71
6067008702	14.73	24.85	20-25%	Sacramento	2713	4.13	59.68	36.2	2.1	81.39	0.63	0	12.68	3.21
6067008703	35.41	68.22	65-70%	Sacramento	4984	7.7	67.7	24.6	5.9	60.93	2.77	0.28	25.24	4.88
6067008704	12.24	18.58	15-20%	Sacramento	3781	23.22	70.19	6.59	13.91	42.63	8.97	1.03	30.18	3.28
6067008705	25.50	49.86	45-50%	Sacramento	8532	19.19	73.5	7.31	13.14	44.01	6.22	0.14	29.74	6.74
6067008801	28.53	55.91	55-60%	Sacramento	4156	14.56	74.86	10.59	14.63	55.25	8.73	0	11.86	9.53
6067008905	28.02	54.99	50-55%	Sacramento	4761	9.24	74.94	15.82	24.76	61.54	3.97	0.17	4.89	4.66
6067008907	27.41	53.78	50-55%	Sacramento	5458	13.7	73.58	12.72	22.9	57.62	6.08	0.29	7.71	5.39
6067008908	49.42	87.30	85-90%	Sacramento	4858	12.58	66.57	20.85	31.82	49.75	5.8	0	6.05	6.57
6067008909	21.98	42.11	40-45%	Sacramento	2467	13.62	66.8	19.58	19.7	48.68	7.5	0	7.05	17.07
6067008910	35.56	68.51	65-70%	Sacramento	3861	20.54	68.14	11.32	27.09	57.47	3.29	0	3.37	8.78
6067008911	27.19	53.44	50-55%	Sacramento	2648	22.51	72.58	4.91	27.27	39.73	16.2	0.34	5.74	10.73
6067008912	20.98	39.98	35-40%	Sacramento	3086	9.53	72.16	18.31	13.8	67.6	4.57	0	9.11	4.93
6067008913	24.97	48.65	45-50%	Sacramento	4059	7.59	75.44	16.97	20.1	65.51	1.9	0.15	6.38	5.96
6067009004	30.03	58.72	55-60%	Sacramento	3868	9.33	77.71	12.95	21.61	35.78	17.3	0	16.42	8.89
6067009005	37.25	70.86	70-75%	Sacramento	3224	15.85	74.84	9.31	18.18	45.01	9.65	3.44	12.25	11.48
6067009006	41.12	76.80	75-80%	Sacramento	5519	17.14	70.81	12.05	24.55	39.48	15.71	1.78	11.87	6.61
6067009007	42.61	78.85	75-80%	Sacramento	2579	14.35	75.8	9.85	28.31	32.14	15.16	0	16.01	8.38
6067009008	54.23	91.83	90-95%	Sacramento	5227	22.94	67.88	9.18	36.66	40.69	12.82	0	4.82	5.01
6067009010	39.75	74.61	70-75%	Sacramento	5408	11.91	80.73	7.36	10.28	43.07	14.81	0.43	24.37	7.05
6067009011	23.43	45.42	45-50%	Sacramento	4610	13.45	74.01	12.54	13.6	44.47	7.11	0	26.79	8.03
6067009103	26.51	52.00	50-55%	Sacramento	3210	8.32	77.07	14.61	22.9	50.16	11.87	0.9	12.12	2.06
6067009105	36.24	69.50	65-70%	Sacramento	2629	14.45	75.39	10.16	28.79	38.68	8.71	0.46	16.09	7.27
6067009106	13.27	21.14	20-25%	Sacramento	4178	6.29	79.54	14.17	25.85	54.57	7.11	0	8.74	3.73
6067009107	21.80	41.78	40-45%	Sacramento	3419	11.14	71.1	17.75	19.16	47.85	18.16	0	9.1	5.73
6067009108	15.46	26.54	25-30%	Sacramento	3937	13.54	68.05	18.42	21.39	58.14	3.38	0.61	7.98	8.51
6067009109	19.26	35.74	35-40%	Sacramento	5006	8.37	76.35	15.28	19.4	53.68	10.71	0	8.77	7.45
6067009110	41.67	77.60	75-80%	Sacramento	2029	22.52	73.93	3.55	32.23	28.59	24.64	0	5.96	8.58
6067009111	24.30	47.38	45-50%	Sacramento	5416	10.43	78.56	11	19.29	35.45	17.85	0.79	18.72	7.88
6067009112	24.97	48.66	45-50%	Sacramento	4004	14.71	73.23	12.06	24.18	43.61	8.34	0.95	14.96	7.97
6067009201	36.93	70.47	70-75%	Sacramento	5151	13.84	69.31	16.85	20.38	32.36	7.77	0.27	33.88	5.34
6067009307	17.67	31.97	30-35%	Sacramento	5687	15.17	72.48	12.34	14.84	59.54	6.14	0	12.4	7.09
6067009308	13.88	22.71	20-25%	Sacramento	6202	9.84	73.98	16.19	26.43	58.27	3.48	0	6.16	5.66
6067009309	17.83	32.31	30-35%	Sacramento	2340	9.91	62.99	27.09	17.91	66.45	0.98	2.74	6.88	5.04
6067009310	23.35	45.28	45-50%	Sacramento	7506	13.44	73.85	12.71	19.6	51.27	6.81	0.73	16.52	5.08
6067009311	16.11	28.18	25-30%	Sacramento	6539	15.72	72.72	11.56	19.41	33.43	12.69	0	28.69	5.78
6067009312	17.59	31.81	30-35%	Sacramento	6629	8.66	80.75	10.59	21.96	28.77	3.71	0.83	36.98	7.75
6067009314	25.08	48.88	45-50%	Sacramento	5943	11.9	75.74	12.37	16.69	27.31	13.07	0.74	30.59	11.59
6067009316	37.00	70.59	70-75%	Sacramento	4636	10.5	80.46	9.04	26.49	10.74	13.18	0	40.62	8.97
6067009317	27.21	53.45	50-55%	Sacramento	6300	13.79	75.08	11.13	28.22	27.75	10.81	0.05	27.08	6.1
6067009318	44.29	81.20	80-85%	Sacramento	2480	14.88	75.85	9.27	19.11	13.79	18.31	0	42.34	6.45

6067009319	39.49	74.14	70-75%	Sacramento	4276	16.11	73.43	10.45	21.21	17.24	6.03	0.09	48.39	7.04
6067009320	32.93	63.88	60-65%	Sacramento	4437	13	74.19	12.8	29.07	16.52	12.85	0	37.91	3.65
6067009321	22.22	42.61	40-45%	Sacramento	5648	9.76	80.42	9.83	19.67	22.65	13.19	0	35.52	8.98
6067009322	28.76	56.44	55-60%	Sacramento	13952	13.69	77.21	9.1	15.21	18.05	11.75	0.32	50.1	4.58
6067009323	20.09	37.72	35-40%	Sacramento	6130	11.42	74.34	14.24	15.01	40.95	10.41	0	28.6	5.04
6067009324	9.11	10.89	10-15%	Sacramento	2996	8.91	73.3	17.79	11.45	60.15	4.11	0.53	16.02	7.74
6067009325	14.79	25.05	25-30%	Sacramento	802	10.6	64.46	24.94	20.2	65.46	4.11	0	5.37	4.86
6067009326	8.09	8.71	5-10%	Sacramento	5041	12.8	74.13	13.07	16.19	40.57	8.83	0.52	29.5	4.4
6067009328	17.22	30.84	30-35%	Sacramento	5851	13.01	77.47	9.52	22.61	29.47	6.7	0	35.66	5.57
6067009329	15.79	27.32	25-30%	Sacramento	2327	18.05	76.88	5.07	17.28	23.85	13.02	0.17	37.9	7.78
6067009330	11.82	17.40	15-20%	Sacramento	4040	9.53	78.12	12.35	14.33	36.11	7.15	0	32.65	9.75
6067009331	15.39	26.45	25-30%	Sacramento	7545	13.57	77.91	8.52	12.41	34.9	10.66	0.33	36.14	5.57
6067009332	12.44	19.06	15-20%	Sacramento	1339	8.07	72.52	19.42	16.21	37.57	0	0	41.22	5
6067009403	19.90	37.28	35-40%	Sacramento	2010	13.48	68.11	18.41	35.67	56.02	0	1.44	4.18	2.69
6067009404	8.55	9.73	5-10%	Sacramento	5953	8.62	70.89	20.49	24.59	62.22	0.91	1.66	9.24	1.38
6067009406	6.44	5.62	5-10%	Sacramento	2300	7.91	70.74	21.35	21.57	67.57	2.35	1.13	5.31	2.09
6067009407	19.35	35.83	35-40%	Sacramento	10900	12.16	77.31	10.53	38.43	47.45	3.46	0	4.81	5.85
6067009408	16.48	29.02	25-30%	Sacramento	2017	12.79	72.58	14.63	31.23	54.09	1.39	0.35	8.87	4.07
6067009501	31.87	62.15	60-65%	Sacramento	2829	14.42	70.87	14.7	60.73	33.86	0.57	0	2.58	2.26
6067009502	18.49	33.91	30-35%	Sacramento	7971	13.88	74.56	11.57	36.13	54.37	0.69	0.25	4.62	3.94
6067009503	37.04	70.66	70-75%	Sacramento	3123	5.38	73.84	20.78	48.16	41.63	0.06	0	8.84	1.31
6067009504	21.54	41.19	40-45%	Sacramento	2564	18.33	68.6	13.07	49.34	37.6	0.86	0.66	4.25	7.29
6067009601	31.35	61.26	60-65%	Sacramento	6772	13.53	76.33	10.14	29.64	6.94	25.25	0	35.96	2.22
6067009606	36.23	69.49	65-70%	Sacramento	7488	22.16	63.47	14.37	27.99	18.86	20.14	0.16	27.01	5.85
6067009608	28.27	55.42	55-60%	Sacramento	9519	13.78	78.98	7.24	15.71	17.59	15.45	0.46	44.53	6.26
6067009609	12.76	19.82	15-20%	Sacramento	5517	11.85	79.39	8.75	18.09	17.93	18.74	0	40.28	4.97
6067009610	14.95	25.43	25-30%	Sacramento	7007	14.04	76.1	9.86	23.01	19.39	20.15	0.83	26.9	9.72
6067009611	26.23	51.37	50-55%	Sacramento	3525	12.2	74.52	13.28	16.82	40	15.8	0.03	20.82	6.52
6067009612	17.85	32.39	30-35%	Sacramento	5361	13.77	74.87	11.36	25.65	29.3	16	0.58	23.02	5.45
6067009614	13.85	22.60	20-25%	Sacramento	7010	14.22	76.6	9.17	26.99	19.93	16.35	0	29.87	6.86
6067009615	12.68	19.60	15-20%	Sacramento	8108	10.22	79.95	9.83	27.73	35.1	12.03	0	18.11	7.04
6067009616	18.66	34.39	30-35%	Sacramento	6100	19.28	63.93	16.79	21.66	45.66	7.51	0.26	23.15	1.77
6067009617	11.65	16.91	15-20%	Sacramento	3668	11.01	69.55	19.44	14.69	51.2	9.65	0.27	19.54	4.63
6067009618	27.42	53.81	50-55%	Sacramento	5274	14.13	73.38	12.5	23.23	22.81	21.41	0	26.24	6.31
6067009619	20.83	39.61	35-40%	Sacramento	7863	10.52	76.79	12.69	23.25	29.17	8.01	0	33.42	6.14
6067009622	18.15	33.06	30-35%	Sacramento	7991	13.55	70.49	15.96	11.11	42.26	10.29	0	26.7	9.64
6067009630	12.85	20.10	20-25%	Sacramento	10015	15.11	74.46	10.43	20.84	26.35	14.42	0.14	33.3	4.95
6067009632	10.08	13.12	10-15%	Sacramento	7457	13.75	77.06	9.2	16.64	23.24	13.21	0	38.19	8.72
6067009633	19.85	37.14	35-40%	Sacramento	3579	16.68	73.48	9.84	34.95	13.1	18.02	0.31	27.33	6.29
6067009634	23.02	44.55	40-45%	Sacramento	5062	16.06	77.2	6.74	33.68	5.63	17.44	0	32.9	10.35
6067009635	19.31	35.82	35-40%	Sacramento	6558	17.32	76.23	6.45	17.61	31.93	9.64	0	35.73	5.09
6067009636	9.87	12.61	10-15%	Sacramento	7741	16.79	75.11	8.1	20.38	28.33	9.44	0.22	36.06	5.55
6067009637	7.41	7.48	5-10%	Sacramento	6704	13.62	74.58	11.8	18.32	19.78	15.98	0.81	39.9	5.22
6067009638	23.56	45.64	45-50%	Sacramento	12225	11.06	70.25	18.69	17.04	33.16	10.98	0.86	31.78	6.18
6067009639	30.09	58.88	55-60%	Sacramento	3892	11.87	74.02	14.11	13.16	20.58	20.07	0.21	37.15	8.84
6067009800	29.11	57.06	55-60%	Sacramento	1514	4.16	67.17	28.67	19.15	72.99	0.59	1.25	2.58	3.43
6067009900	32.79	63.67	60-65%	Sacramento	3571	14.28	66.65	19.07	44.92	41.33	3.89	0	4.2	5.66
6067988300	NA	NA	NA	Sacramento	4860	0	97.16	2.84	27.04	23.52	39.09	1.87	6.95	1.52
6069000100	33.16	64.35	60-65%	San Benito	4600	8.89	72.24	18.87	38.5	50.76	3.59	0	3.65	3.5
6069000200	26.50	51.98	50-55%	San Benito	6263	11.9	68.93	19.18	45.39	46.29	0	0	6.63	1.69
6069000300	30.50	59.67	55-60%	San Benito	4588	11.05	78.29	10.66	87.64	7.48	0.68	0.48	3.38	0.35
6069000400	35.15	67.79	65-70%	San Benito	6348	16.56	73.87	9.58	75.13	22.78	0.35	0	0.3	1.45
6069000501	23.76	46.12	45-50%	San Benito	6207	12.99	79.2	7.81	53.38	40.94	0.34	0	2.84	2.51
6069000502	28.74	56.40	55-60%	San Benito	6930	12.66	79.35	7.99	77.22	18.98	0.14	1	1.15	1.52
6069000600	16.63	29.43	25-30%	San Benito	9187	13.12	74.92	11.96	57.48	34.71	0.53	0	4.43	2.84
6069000701	22.56	43.42	40-45%	San Benito	4851	21.13	72.95	5.92	80.46	15.71	1.73	0.23	0.41	1.46
6069000702	33.82	65.58	65-70%	San Benito	5416	13.7	72.53	13.77	54.97	35.34	0.94	1.55	5.35	1.85
6069000801	9.11	10.88	10-15%	San Benito	2937	7.08	68.27	24.65	23.15	73.44	0.51	0	1.67	1.23

6069000802	23.49	45.55	45-50%	San Benito	3049	12.27	72.38	15.35	38.44	59.1	0.2	0	0.36	1.9
6071000103	28.67	56.25	55-60%	San Bernardino	4438	8.2	81.52	10.27	29.79	25.98	3.76	0	38.37	2.1
6071000104	19.17	35.56	35-40%	San Bernardino	6928	13.28	72.82	13.9	22.66	23.07	4.78	0	48.37	1.13
6071000105	23.66	45.75	45-50%	San Bernardino	6392	7.68	80.1	12.22	25.17	26.77	5.37	2.35	38	2.35
6071000107	13.56	21.87	20-25%	San Bernardino	3062	7.97	74.13	17.9	33.02	44.09	2.71	0	19.56	0.62
6071000108	17.16	30.69	30-35%	San Bernardino	5923	13.73	78.46	7.82	31.17	32.11	4.41	0	29.98	2.33
6071000109	20.76	39.42	35-40%	San Bernardino	6953	11.97	75.72	12.31	33.94	48.58	1.25	0	14.84	1.38
6071000111	14.59	24.53	20-25%	San Bernardino	2721	14.15	73.36	12.5	15.8	49.94	7.09	1.32	23.85	1.98
6071000113	27.61	54.11	50-55%	San Bernardino	12332	13.7	73.69	12.6	47.32	22.73	1.48	0.11	24.56	3.8
6071000115	26.40	51.64	50-55%	San Bernardino	8187	16.62	75.66	7.72	35.91	24.94	1.2	0.29	33.93	3.73
6071000116	21.41	40.92	40-45%	San Bernardino	12989	12.09	77.67	10.23	19.29	31.26	6.84	0.12	39.73	2.76
6071000117	14.86	25.19	25-30%	San Bernardino	6956	7.52	80.85	11.63	17.14	26.5	2.27	0.36	47.11	6.63
6071000118	14.93	25.40	25-30%	San Bernardino	4697	8.62	79.58	11.79	19.08	21.59	1.43	0.26	54.82	2.83
6071000201	41.05	76.73	75-80%	San Bernardino	5240	11.43	80.27	8.3	66.85	14.98	3.68	0.25	10.95	3.28
6071000203	44.18	81.05	80-85%	San Bernardino	4349	11.11	79.26	9.63	75.76	11.04	1.29	1.38	9.54	0.99
6071000205	36.77	70.27	70-75%	San Bernardino	5449	10.17	72.01	17.82	65.31	19.14	1.78	0.51	8.37	4.88
6071000207	38.58	73.01	70-75%	San Bernardino	4456	14.47	75.45	10.08	69.93	17.93	1.8	0	8.77	1.57
6071000208	34.37	66.49	65-70%	San Bernardino	4808	9.94	80.74	9.32	76.37	14.89	0.79	1.39	4.7	1.85
6071000301	64.20	97.54	95-100% (highest scores)	San Bernardino	9434	16.92	74.84	8.25	77.2	2.85	6.05	0	12.92	0.98
6071000303	46.58	83.94	80-85%	San Bernardino	7837	14.33	75.5	10.17	86.26	6.35	0.31	0	6.53	0.55
6071000304	46.60	83.96	80-85%	San Bernardino	6223	10.75	76.49	12.76	67.28	15.02	2.6	0.8	11.76	2.52
6071000401	36.13	69.40	65-70%	San Bernardino	6350	10.49	72.82	16.69	52.06	30.39	3.8	0.11	8.83	4.8
6071000403	32.86	63.75	60-65%	San Bernardino	4261	7.3	78.76	13.94	56.61	27.58	2.23	0.14	13.45	0
6071000404	38.28	72.58	70-75%	San Bernardino	4048	8.47	70.53	21	56.52	26.53	3.9	0	9.96	3.09
6071000501	34.14	66.12	65-70%	San Bernardino	6286	10.8	76.73	12.47	59.21	25.42	2.78	0	11.49	1.1
6071000503	29.13	57.07	55-60%	San Bernardino	4698	15.22	76.71	8.07	62.56	20.16	1.92	0	12.31	3.07
6071000504	30.26	59.22	55-60%	San Bernardino	4530	7.42	77.92	14.66	56.6	31.24	1.24	0.04	9.43	1.46
6071000603	40.26	75.40	75-80%	San Bernardino	5508	14.58	75.42	10	63.71	21.5	6.05	0	7.68	1.07
6071000604	40.40	75.68	75-80%	San Bernardino	5436	14.42	72	13.58	61.77	28.9	2.28	0	4.3	2.74
6071000605	40.48	75.84	75-80%	San Bernardino	5087	13.96	77.16	8.89	87.77	7.39	0.79	0	3.97	0.08
6071000606	33.74	65.41	65-70%	San Bernardino	4119	11.87	81.5	6.63	71.26	15.34	2.52	0	10.1	0.78
6071000804	7.90	8.30	5-10%	San Bernardino	3191	7.87	72.55	19.59	27.77	60.29	0.03	0.47	9.24	2.19
6071000808	34.87	67.39	65-70%	San Bernardino	6084	13.74	72.24	14.02	47.9	40.42	3.48	0	5.64	2.56
6071000812	22.85	44.06	40-45%	San Bernardino	3812	12.25	71.75	16	35.65	52.54	3.67	0.31	5.38	2.44
6071000813	9.73	12.29	10-15%	San Bernardino	3254	6.05	72.34	21.6	27.5	51.54	2.03	0	14.72	4.21
6071000814	10.57	14.32	10-15%	San Bernardino	3940	11.83	66.27	21.9	24.39	59.16	1.29	0	7.66	7.49
6071000815	10.80	14.96	10-15%	San Bernardino	3491	8.97	68.63	22.4	29.96	47.64	3.55	0.86	15.78	2.21
6071000816	8.83	10.27	10-15%	San Bernardino	4205	8.89	68.97	22.14	28.25	55.81	4.42	0	8.23	3.28
6071000817	28.91	56.78	55-60%	San Bernardino	3897	9.88	69.69	20.43	32.95	45.24	3.13	0	15.04	3.64
6071000818	26.82	52.69	50-55%	San Bernardino	5228	8.93	73.36	17.71	36.36	45.41	6.64	0.19	7.71	3.69
6071000819	19.64	36.60	35-40%	San Bernardino	5013	10.09	71.23	18.67	27.91	47.04	3.95	0.4	19.55	1.16
6071000820	11.10	15.66	15-20%	San Bernardino	3874	10.71	69.46	19.82	18.02	60.89	2.99	0.65	11.18	6.27
6071000821	37.42	71.27	70-75%	San Bernardino	4017	14.61	79.24	6.15	45.53	21.86	7.72	0.47	14.86	9.56
6071000823	40.36	75.61	75-80%	San Bernardino	6604	12.81	75.39	11.8	46.2	35.39	6.97	0	7.81	3.63
6071000824	44.19	81.08	80-85%	San Bernardino	5645	14.88	75.22	9.9	54.56	27.95	10.77	0	3.56	3.15
6071000825	44.82	81.76	80-85%	San Bernardino	4129	16.74	77.52	5.74	64.5	16.74	11.79	0	4.58	2.4
6071000826	46.18	83.46	80-85%	San Bernardino	4158	13.88	71.98	14.14	53.61	33.57	2.69	0	7.55	2.57
6071000901	38.55	72.96	70-75%	San Bernardino	5051	11.32	74.01	14.67	58.27	31.78	3.78	0.36	3.35	2.47
6071000903	41.37	77.24	75-80%	San Bernardino	4344	9.69	82.16	8.15	58.08	19.66	12.48	0	7.27	2.51
6071000904	47.95	85.41	85-90%	San Bernardino	3662	14.06	77.94	8	66.6	23.43	2.76	0	6.42	0.79
6071001001	45.56	82.67	80-85%	San Bernardino	5557	16.59	75.98	7.43	62.89	16.47	10.62	0	7.11	2.92
6071001002	38.89	73.31	70-75%	San Bernardino	5929	18.32	75.31	6.38	82.19	8.72	7.49	0	1.13	0.47
6071001101	59.53	95.45	95-100% (highest scores)	San Bernardino	4173	17.11	74.98	7.91	76.11	12.94	0.58	0	8.89	1.49
6071001103	40.14	75.19	75-80%	San Bernardino	4426	19.27	63.94	16.79	60.53	37.1	0.27	0.5	1.6	0
6071001104	49.91	87.75	85-90%	San Bernardino	6140	15.83	70.99	13.18	67.08	23.79	1.71	2.87	2.07	2.48
6071001200	35.45	68.37	65-70%	San Bernardino	4905	8.34	79.04	12.62	55.58	38.17	1.96	0	1.86	2.45
6071001305	48.28	85.84	85-90%	San Bernardino	5788	15.64	79.51	4.85	85.31	6.32	0.52	2.07	5.41	0.36
6071001307	39.44	74.04	70-75%	San Bernardino	4212	12.2	78.7	9.09	76.88	15	3.3	0	4.22	0.59

6071001308	49.87	87.70	85-90%	San Bernardino	4643	11.91	80.1	7.99	80.68	13.98	0.24	2	2.52	0.58
6071001309	46.78	84.13	80-85%	San Bernardino	4658	14.41	71.75	13.85	74.71	9.64	8.54	0	4.59	2.51
6071001310	42.76	79.11	75-80%	San Bernardino	6193	13.18	74.73	12.09	80.74	15.47	0.71	0.18	0.29	2.62
6071001311	28.40	55.71	55-60%	San Bernardino	3350	9.13	79.76	11.1	42.69	22.21	6.93	0.27	26.39	1.52
6071001312	40.73	76.25	75-80%	San Bernardino	5127	13.13	78.66	8.21	64.13	11.62	10.34	0.45	7.63	5.83
6071001400	52.22	90.29	90-95%	San Bernardino	2863	10.09	76.04	13.87	54.87	23.51	15.3	0.49	5.2	0.63
6071001501	60.61	96.07	95-100% (highest scores)	San Bernardino	4218	17.05	77.12	5.83	90.97	8.27	0	0	0.76	0
6071001503	46.05	83.31	80-85%	San Bernardino	4126	21.28	73.82	4.9	88.44	5.57	1.7	0.27	2.59	1.43
6071001504	47.03	84.53	80-85%	San Bernardino	6006	19.71	73.63	6.66	71.56	5.78	10.22	0	10.96	1.48
6071001600	74.67	99.62	95-100% (highest scores)	San Bernardino	5363	15.68	78.95	5.37	96.31	2.29	0.56	0	0.11	0.73
6071001702	43.72	80.38	80-85%	San Bernardino	5300	12.08	73.21	14.72	59	24.42	9.94	0.64	3.62	2.38
6071001703	32.71	63.59	60-65%	San Bernardino	5680	10.33	76.04	13.63	53.89	32.18	1.88	0	9.4	2.64
6071001704	46.32	83.64	80-85%	San Bernardino	5273	13.54	78.61	7.85	72.03	14.13	3.26	0	9.23	1.35
6071001706	46.15	83.43	80-85%	San Bernardino	6283	15.52	76.03	8.45	75.46	11.17	5.28	0	5.01	3.07
6071001707	35.56	68.52	65-70%	San Bernardino	6525	16.66	71.2	12.14	75.03	11.19	3.16	0	8.27	2.34
6071001803	61.64	96.46	95-100% (highest scores)	San Bernardino	3263	8.37	69.75	21.88	66.44	22.13	2.24	0.28	8.64	0.28
6071001804	34.99	67.59	65-70%	San Bernardino	5250	9.77	79.31	10.91	59.03	21.22	5.18	0.59	12.61	1.37
6071001806	37.94	72.02	70-75%	San Bernardino	4797	10.84	76.36	12.8	63.89	19.74	3.88	0.02	10.65	1.81
6071001808	27.24	53.52	50-55%	San Bernardino	4644	9.32	82.17	8.51	66.84	17.81	9.54	0.02	2.95	2.84
6071001809	46.14	83.42	80-85%	San Bernardino	4975	13.39	78.41	8.2	80.64	15.98	1.57	0	0.62	1.19
6071001810	42.94	79.39	75-80%	San Bernardino	5273	12.73	80.62	6.66	83.84	7.76	4.44	0	3.26	0.7
6071001812	46.91	84.30	80-85%	San Bernardino	3477	11.02	77.85	11.13	85.04	7.88	2.53	0.03	3.94	0.58
6071001813	50.49	88.38	85-90%	San Bernardino	4855	15.22	79.09	5.68	90.98	3.07	3.21	0.31	2.06	0.37
6071001901	25.40	49.68	45-50%	San Bernardino	4664	11.84	74.64	13.53	50.86	28.28	4.93	0.04	14.39	1.5
6071001903	37.96	72.05	70-75%	San Bernardino	13753	16.44	77.16	6.4	28.97	24.02	4.93	0.25	36.98	4.86
6071001905	38.99	73.42	70-75%	San Bernardino	6981	11.45	79.36	9.2	55.67	20.76	3.04	0.42	17.23	2.89
6071001906	40.90	76.46	75-80%	San Bernardino	10032	14.81	78.68	6.51	50.65	19.47	8.51	0	17.35	4.02
6071002010	19.05	35.27	35-40%	San Bernardino	10458	13.55	77.46	8.99	35.32	33.37	10.04	0.14	16.74	4.38
6071002011	5.81	4.34	1-5% (lowest scores)	San Bernardino	4233	9.31	71.08	19.61	25.49	63.97	2.01	0	3.95	4.58
6071002013	18.72	34.57	30-35%	San Bernardino	4084	9.43	70.03	20.54	28.43	60.46	5.61	0	3.82	1.69
6071002014	14.76	24.92	20-25%	San Bernardino	4801	9.87	73.67	16.45	29.87	56.82	5.92	0.04	4.71	2.65
6071002015	21.72	41.57	40-45%	San Bernardino	4533	11.87	76.06	12.07	40.9	43.26	2.78	0.57	11.03	1.46
6071002016	31.22	61.11	60-65%	San Bernardino	3660	11.86	75.46	12.68	41.15	45.03	0.87	0.25	7.16	5.55
6071002017	9.90	12.66	10-15%	San Bernardino	5599	7.16	73.83	19	27.84	59.33	1.54	0	10.36	0.93
6071002018	18.98	35.10	35-40%	San Bernardino	4607	10.83	74.89	14.28	29.43	53.25	3.02	0	10.59	3.71
6071002019	31.48	61.45	60-65%	San Bernardino	5579	14.52	77.07	8.41	34.88	32.34	12.8	0	15.24	4.75
6071002021	9.51	11.72	10-15%	San Bernardino	5402	9.81	77.18	13.01	32.62	41	5.83	0.11	15.09	5.35
6071002022	11.79	17.30	15-20%	San Bernardino	13434	13.76	75.41	10.83	29.64	36.29	6.55	0.09	22.55	4.88
6071002023	22.60	43.48	40-45%	San Bernardino	5846	9.78	69.95	20.27	41.58	39.43	6.88	0.53	6.09	5.49
6071002025	21.69	41.53	40-45%	San Bernardino	5211	11.78	68.45	19.77	34.39	54.27	3.09	0	4.39	3.86
6071002027	30.44	59.54	55-60%	San Bernardino	5415	10.01	76.25	13.74	50.82	31.08	8.75	0	6.46	2.88
6071002028	24.11	46.97	45-50%	San Bernardino	5229	14.25	73.07	12.68	37.25	41.92	7.29	0	11.57	1.97
6071002029	17.75	32.14	30-35%	San Bernardino	5886	9.53	79.07	11.4	31.69	47.62	7.7	0	11.01	1.99
6071002031	13.89	22.72	20-25%	San Bernardino	6262	11.16	79.61	9.23	34.96	37.64	7.23	0	16.99	3.18
6071002033	20.14	37.82	35-40%	San Bernardino	7734	13.42	77.97	8.61	40.88	32.21	8.16	0	17.77	0.98
6071002034	23.74	46.04	45-50%	San Bernardino	15502	11.95	76.68	11.37	38.03	24.56	11.45	0.01	21.43	4.52
6071002035	18.50	33.95	30-35%	San Bernardino	7445	12.08	76.32	11.61	38.11	35.78	7.75	0	14.87	3.49
6071002036	25.38	49.62	45-50%	San Bernardino	14218	19.28	73.7	7.02	31.63	23.88	24.08	1.53	17.33	1.55
6071002037	26.89	52.81	50-55%	San Bernardino	7949	11.74	77.91	10.35	51.54	11.78	19.06	1.66	12.49	3.47
6071002038	20.54	38.87	35-40%	San Bernardino	6890	13.09	77.27	9.64	42.08	16.76	23.64	0	12.13	5.38
6071002101	38.18	72.44	70-75%	San Bernardino	4960	15.89	74.35	9.76	60.36	22.5	6.45	2.42	2.54	5.73
6071002103	38.34	72.71	70-75%	San Bernardino	5334	17.12	77.11	5.77	44.96	27.3	12.05	0	10.65	5.04
6071002105	40.37	75.64	75-80%	San Bernardino	5920	13.29	73.09	13.61	54.36	20.56	8.09	0.14	12.75	4.1
6071002107	41.76	77.75	75-80%	San Bernardino	5577	14.54	76.12	9.34	49.92	28.98	11.92	0.5	4.36	4.32
6071002109	27.63	54.17	50-55%	San Bernardino	6121	9.05	85.31	5.64	30.26	26.81	17.71	0	20.58	4.64
6071002110	39.69	74.47	70-75%	San Bernardino	7460	16.43	75.17	8.39	35.11	28.73	19.52	0.75	12.91	2.99
6071002204	56.12	93.31	90-95%	San Bernardino	6624	16.43	78.03	5.54	75.59	8.89	7.88	0	6.84	0.8
6071002206	40.36	75.58	75-80%	San Bernardino	7293	12.48	77.84	9.68	64.73	19.29	6.29	0.12	6.31	3.25

6071002207	33.85	65.61	65-70%	San Bernardino	5553	9.74	85.2	5.06	53.66	16.98	21.88	0.16	5.4	1.91
6071002301	43.01	79.49	75-80%	San Bernardino	11473	14.36	77.93	7.71	76.47	6.82	4.77	0.2	8.36	3.38
6071002304	25.48	49.82	45-50%	San Bernardino	21798	13.52	80.51	5.98	53.5	17.57	11.68	0.52	13.17	3.57
6071002305	29.50	57.83	55-60%	San Bernardino	10909	14.07	76.25	9.68	66.07	13.53	11.52	0.12	7.27	1.49
6071002306	32.21	62.77	60-65%	San Bernardino	4079	10.98	80.66	8.36	73.25	9.29	10.52	0.02	5.66	1.25
6071002307	28.40	55.72	55-60%	San Bernardino	5149	12.45	76.75	10.8	77.96	11.34	6.1	0.43	3.5	0.68
6071002401	46.96	84.38	80-85%	San Bernardino	8682	13.42	79.57	7.01	91.15	4.23	1.92	0.21	0.93	1.55
6071002402	44.25	81.16	80-85%	San Bernardino	8364	16.01	79.02	4.97	87.25	10.01	1.35	0	1.22	0.17
6071002501	53.27	91.09	90-95%	San Bernardino	6840	13.92	79.43	6.65	88.89	7.46	3	0	0.66	0
6071002502	38.13	72.37	70-75%	San Bernardino	8979	15.56	76.97	7.47	89.65	4.63	3.94	0	0.98	0.79
6071002601	37.40	71.21	70-75%	San Bernardino	9594	13.46	77.63	8.91	66.62	11.92	8.37	0	9.35	3.73
6071002602	34.52	66.75	65-70%	San Bernardino	7566	14.94	80.31	4.76	78.73	9.36	7.51	0.21	3.74	0.45
6071002604	33.15	64.30	60-65%	San Bernardino	5592	12.68	82.78	4.54	73.19	13.38	6.46	0	1.77	5.2
6071002606	32.54	63.39	60-65%	San Bernardino	7857	13.99	80.68	5.33	72.3	6.73	12.12	0	6.48	2.37
6071002607	28.15	55.24	55-60%	San Bernardino	8987	13.1	79.39	7.51	64.4	9.11	13.59	0.27	5.47	7.15
6071002703	27.75	54.40	50-55%	San Bernardino	5670	12.87	78.54	8.59	62.52	21.02	13.9	0	2.36	0.19
6071002704	43.28	79.88	75-80%	San Bernardino	11527	14.5	75.45	10.05	46.17	23.15	14.35	0	12.98	3.36
6071002705	31.53	61.56	60-65%	San Bernardino	5273	10.9	76.29	12.8	68.69	13.37	13.45	0	2.43	2.07
6071002706	36.75	70.21	70-75%	San Bernardino	14133	13.9	77.69	8.41	53.19	23.98	15.74	0	4.98	2.11
6071002801	27.80	54.53	50-55%	San Bernardino	5781	17.9	75.21	6.88	81.98	7.16	5.66	0	3.63	1.57
6071002803	48.61	86.23	85-90%	San Bernardino	4226	14.77	77.57	7.67	84.05	8.38	6.01	0	1.3	0.26
6071002804	42.71	79.01	75-80%	San Bernardino	5747	22.6	73.62	3.78	87.73	4.18	7.4	0	0.52	0.17
6071002901	36.70	70.10	70-75%	San Bernardino	4691	15.07	79.22	5.71	86.34	8.59	2.52	0	2.15	0.41
6071002902	35.67	68.67	65-70%	San Bernardino	6182	11.18	79.7	9.12	78.53	10.32	8.49	0	1.8	0.86
6071003000	48.64	86.31	85-90%	San Bernardino	3254	10.63	71.57	17.79	75.17	12.17	10.05	0.77	1.85	0
6071003101	37.98	72.10	70-75%	San Bernardino	5287	18.65	76.92	4.43	89.75	6.54	1.53	0	1.1	1.08
6071003102	50.22	88.12	85-90%	San Bernardino	5919	19.23	75.87	4.9	91.52	6.32	1.35	0	0.81	0
6071003200	40.72	76.22	75-80%	San Bernardino	8222	14.83	75.68	9.5	76.1	16.95	4.37	0.97	1.61	0
6071003301	55.89	93.18	90-95%	San Bernardino	5306	18.36	70.92	10.72	83.21	8.44	4.56	0	2.3	1.49
6071003302	53.39	91.23	90-95%	San Bernardino	6450	19.26	68.22	12.53	75.4	18.99	2.84	0	1.27	1.5
6071003401	35.52	68.41	65-70%	San Bernardino	7654	17.85	74.3	7.85	75.33	15.74	6.32	0	1.6	1.01
6071003403	37.03	70.63	70-75%	San Bernardino	3975	10.87	79.3	9.84	79.5	18.84	0.5	0.63	0.2	0.33
6071003404	29.51	57.87	55-60%	San Bernardino	5165	17.81	75.9	6.29	80.68	6.7	9.31	0.14	1.86	1.32
6071003405	40.94	76.55	75-80%	San Bernardino	5833	21.29	72.79	5.91	77.95	7.23	11.45	0	2.5	0.86
6071003503	46.51	83.88	80-85%	San Bernardino	5777	14.35	76.74	8.91	72.58	9.4	11.2	0	5.44	1.38
6071003505	51.17	89.07	85-90%	San Bernardino	7473	19	78.12	2.88	77.65	6.02	11.7	0.2	2.65	1.78
6071003506	44.51	81.42	80-85%	San Bernardino	5535	18.07	72.07	9.86	69.97	12.07	14.62	0.13	2.96	0.25
6071003507	40.57	75.98	75-80%	San Bernardino	4367	13.28	71.67	15.04	79.23	5.47	10.37	0	4.14	0.78
6071003509	54.59	92.20	90-95%	San Bernardino	4343	16.07	72.07	11.86	78.22	11.33	8.38	2.07	0	0
6071003510	44.61	81.53	80-85%	San Bernardino	5368	20.27	73.4	6.33	74.89	5.14	17.81	0.71	0.82	0.63
6071003603	27.51	53.97	50-55%	San Bernardino	3938	13.23	77.25	9.52	74.76	14.14	9.04	0	0.58	1.47
6071003605	28.04	55.09	55-60%	San Bernardino	4468	11.41	82.41	6.18	71.91	17.14	8.15	0.51	1.45	0.83
6071003606	41.10	76.79	75-80%	San Bernardino	4309	12.95	73.06	13.99	84.24	12.97	0	0	2.78	0
6071003607	45.30	82.30	80-85%	San Bernardino	5532	9.6	79.03	11.37	75.43	8.66	11.17	0	3.11	1.63
6071003609	52.72	90.67	90-95%	San Bernardino	5363	15.35	75.89	8.76	87.15	5.09	3.62	0	2.22	1.92
6071003611	30.60	59.83	55-60%	San Bernardino	4874	16.68	75.05	8.27	68.24	14.63	8.62	0	5.13	3.39
6071003612	55.34	92.81	90-95%	San Bernardino	4676	14.09	77.57	8.34	69.78	10.76	11.55	0.41	3.64	3.87
6071003700	62.39	96.70	95-100% (highest scores)	San Bernardino	3782	15.92	70.84	13.25	80.49	4.81	10.31	0	1.9	2.49
6071003801	41.86	77.82	75-80%	San Bernardino	5112	11.09	77.7	11.21	68.58	7.34	20.56	0.27	3.23	0.02
6071003803	48.05	85.55	85-90%	San Bernardino	5531	13.16	78.29	8.55	83.02	7.9	5.42	0	1.5	2.15
6071003804	46.99	84.42	80-85%	San Bernardino	4951	14.48	74.65	10.87	75.76	6.73	14	0.34	2.83	0.34
6071003900	49.13	86.93	85-90%	San Bernardino	5857	16.68	74.2	9.12	88.19	7.68	3.76	0	0	0.38
6071004001	56.52	93.61	90-95%	San Bernardino	4366	11.45	78.01	10.54	80.85	12.55	4.24	0.14	0.37	1.86
6071004003	58.01	94.53	90-95%	San Bernardino	5975	14.28	79.08	6.64	89.54	9.42	0.05	0.12	0.6	0.27
6071004004	60.49	96.02	95-100% (highest scores)	San Bernardino	5599	15.15	75.75	9.11	74.98	18.81	4.55	0.32	0.95	0.39
6071004101	48.62	86.26	85-90%	San Bernardino	6404	18.55	76.08	5.37	86.79	7.73	4.43	0	0.62	0.42
6071004103	54.30	91.91	90-95%	San Bernardino	6290	18.3	75.12	6.58	82.93	5.45	7.36	0	4.26	0
6071004104	58.80	94.99	90-95%	San Bernardino	6360	22.83	68.76	8.41	88.1	4.67	2.36	0	3.08	1.79

6071004201	54.86	92.42	90-95%	San Bernardino	6943	17.85	71.02	11.13	62.18	3.86	25.12	0	6.21	2.64
6071004202	51.13	89.04	85-90%	San Bernardino	5704	19.69	70	10.31	75.61	2.63	16.3	0.19	4.45	0.81
6071004301	44.59	81.49	80-85%	San Bernardino	4449	16.32	73.32	10.36	71.21	1.48	19.33	0	4.02	3.96
6071004302	58.58	94.82	90-95%	San Bernardino	3655	13.73	69.69	16.58	79.78	9	7.96	0	1.83	1.42
6071004401	41.27	77.02	75-80%	San Bernardino	4284	12.11	80	7.89	84.8	10.71	2.59	0	1.89	0
6071004403	33.44	64.88	60-65%	San Bernardino	5054	12.35	79.5	8.15	84.84	5.56	6.35	0	3.01	0.24
6071004404	38.06	72.25	70-75%	San Bernardino	4598	13.98	79.53	6.48	78.8	6.74	11.83	0	1.37	1.26
6071004503	26.35	51.55	50-55%	San Bernardino	3718	13.34	75.9	10.76	45.43	42.15	5.11	0	6.27	1.05
6071004504	31.87	62.17	60-65%	San Bernardino	8479	12.81	80.28	6.91	53.97	20.58	16.12	0	5.54	3.79
6071004505	35.92	69.01	65-70%	San Bernardino	4989	17.56	75.05	7.4	56.76	19.86	15.19	0.72	0.2	7.26
6071004507	34.50	66.72	65-70%	San Bernardino	5498	20.23	73.72	6.06	66.62	16.08	11.9	0	4.51	0.89
6071004509	28.60	56.09	55-60%	San Bernardino	5251	12.15	77.83	10.02	51.17	23.44	12.32	0.34	4.9	7.83
6071004510	36.52	69.89	65-70%	San Bernardino	5422	10.11	86.57	3.32	53.14	17.69	9.46	0.13	12.32	7.27
6071004601	43.05	79.58	75-80%	San Bernardino	7261	16.14	76.61	7.24	63.49	18.21	10.74	0.07	2.78	4.71
6071004603	39.09	73.63	70-75%	San Bernardino	5526	15	75.05	9.95	51.88	31.51	11.15	0	2.5	2.97
6071004604	56.35	93.46	90-95%	San Bernardino	5621	20.49	71.07	8.43	75.7	11.8	8.08	0.62	0.41	3.4
6071004700	55.68	93.00	90-95%	San Bernardino	5424	17.96	70.98	11.06	88.62	5.29	5.35	0.11	0.17	0.46
6071004800	59.50	95.41	95-100% (highest scores)	San Bernardino	3263	19.55	72.17	8.27	90.1	3.19	6.13	0	0.58	0
6071004900	66.66	98.31	95-100% (highest scores)	San Bernardino	7113	20.57	70.84	8.59	85.93	6.19	6.42	0.35	1.11	0
6071005100	42.48	78.62	75-80%	San Bernardino	8442	17.27	71.83	10.9	62.4	18.89	15.17	0.27	1.1	2.16
6071005200	49.25	87.12	85-90%	San Bernardino	4508	15.26	78.02	6.72	63.42	17.77	8.14	0	3.35	7.32
6071005300	59.46	95.35	95-100% (highest scores)	San Bernardino	5363	17.86	71.86	10.27	72.12	14.32	10.46	0.65	1.98	0.47
6071005400	62.38	96.66	95-100% (highest scores)	San Bernardino	6750	16.55	74.52	8.93	66.22	11.96	12.1	0.41	4.44	4.86
6071005500	61.33	96.32	95-100% (highest scores)	San Bernardino	9180	21.75	73.36	4.89	74.68	9.48	12.8	0.12	1.13	1.79
6071005600	61.37	96.33	95-100% (highest scores)	San Bernardino	6727	19.41	74.64	5.95	69.42	12.87	15.01	0	1.1	1.59
6071005701	65.32	97.92	95-100% (highest scores)	San Bernardino	1580	9.68	52.53	37.78	62.22	9.49	16.46	0	11.84	0
6071005800	49.17	86.95	85-90%	San Bernardino	4013	20.41	70.7	8.9	65.46	8.75	16.94	0.22	7.52	1.1
6071006100	41.62	77.51	75-80%	San Bernardino	9735	16.38	74.57	9.05	60.31	21.3	11.18	1.91	3.89	1.42
6071006201	44.43	81.37	80-85%	San Bernardino	4435	19.23	73.48	7.28	77.09	17.75	2.62	0.05	0.72	1.78
6071006203	48.62	86.25	85-90%	San Bernardino	4995	19.74	72.53	7.73	64.46	9.79	21.86	0	1.22	2.66
6071006204	50.63	88.51	85-90%	San Bernardino	4277	18.8	73.67	7.53	50.48	8.56	33.5	0	2.43	5.03
6071006301	48.69	86.36	85-90%	San Bernardino	5721	8.25	77.54	14.21	64.97	20.45	13.46	0	0.73	0.38
6071006302	45.54	82.63	80-85%	San Bernardino	10389	19.42	74.47	6.1	78.37	11.29	4.63	0	5.52	0.19
6071006401	47.00	84.46	80-85%	San Bernardino	2778	22.32	72.1	5.58	80.63	3.49	13.97	0.32	1.04	0.54
6071006402	48.02	85.46	85-90%	San Bernardino	4813	20.17	73.8	6.03	70.85	14.27	6.42	0	4.49	3.97
6071006500	49.03	86.76	85-90%	San Bernardino	8416	18.76	75.88	5.36	70.1	11.7	10.98	0.58	4.19	2.44
6071006601	41.63	77.53	75-80%	San Bernardino	4477	14.16	77.02	8.82	74.76	18.92	2.57	2.95	0	0.8
6071006603	35.47	68.39	65-70%	San Bernardino	6248	12.84	72.58	14.58	81.91	16.95	0	0.03	1.09	0.02
6071006604	32.89	63.82	60-65%	San Bernardino	3383	15.31	66.92	17.77	66.3	14.63	14.54	0	2.54	1.98
6071006700	35.86	68.94	65-70%	San Bernardino	4391	16.97	73.13	9.91	85.65	12.02	2.12	0	0.2	0
6071007000	54.83	92.39	90-95%	San Bernardino	7368	15.42	76.62	7.97	76.7	14.69	3.94	0	4.38	0.3
6071007104	15.41	26.48	25-30%	San Bernardino	3913	9.15	70.64	20.21	45.67	38.67	5.14	0	9.76	0.77
6071007105	24.32	47.42	45-50%	San Bernardino	3168	17.74	70.14	12.12	48.52	31.57	5.65	0	12.63	1.64
6071007106	36.51	69.87	65-70%	San Bernardino	3825	11.53	73.67	14.8	47.06	34.33	5.96	0	10.43	2.22
6071007107	46.09	83.36	80-85%	San Bernardino	3714	15.7	78.97	5.33	60.29	19.39	16.75	0	3.29	0.3
6071007108	39.49	74.16	70-75%	San Bernardino	2191	13.78	81.42	4.79	51.16	22.77	15.47	0	7.26	3.33
6071007109	35.93	69.02	65-70%	San Bernardino	6611	15.08	72.24	12.68	35.67	42.9	7.37	0	11.48	2.59
6071007110	43.29	79.90	75-80%	San Bernardino	5084	13.71	75.22	11.07	38.3	23.92	8.63	0.43	21.28	7.44
6071007200	53.05	90.90	90-95%	San Bernardino	5964	14.86	71.71	13.43	52.93	13.8	7.58	0	21.75	3.94
6071007302	29.28	57.41	55-60%	San Bernardino	9458	5.46	67.95	26.59	17.28	35.62	8.13	0.16	36.15	2.66
6071007303	48.35	85.98	85-90%	San Bernardino	5039	12.76	78.96	8.28	42.11	25.2	10.1	0	19.89	2.7
6071007305	36.35	69.67	65-70%	San Bernardino	4909	12.81	71.28	15.91	44.41	24.79	5.64	0.04	20.17	4.95
6071007306	20.63	39.13	35-40%	San Bernardino	6070	13.94	69.11	16.95	29.87	30.51	15.14	0	20.3	4.18
6071007403	31.80	62.05	60-65%	San Bernardino	8102	18.71	71.2	10.08	60.53	18.74	15.7	0	2.93	2.11
6071007404	21.79	41.74	40-45%	San Bernardino	4644	14.79	63.82	21.38	47.14	39.04	8.98	0.99	2.86	0.99
6071007407	43.06	79.60	75-80%	San Bernardino	2939	21.3	72.58	6.12	64.04	11.43	20.76	0	2.69	1.09
6071007408	32.03	62.46	60-65%	San Bernardino	4796	24.25	70.23	5.53	55.59	16.08	10.86	0	16.39	1.08
6071007409	35.39	68.15	65-70%	San Bernardino	6979	20.05	69.95	10	66.56	15.16	10.2	0.3	4.96	2.82

6071007410	29.57	57.96	55-60%	San Bernardino	5922	14.37	73.56	12.07	33.96	28.96	23.05	0.54	8.43	5.07
6071007601	44.77	81.72	80-85%	San Bernardino	7655	16.29	78.22	5.49	67.39	7.77	12.78	0.1	7.03	4.92
6071007603	44.09	80.99	80-85%	San Bernardino	5166	21.02	69.63	9.35	62.64	17.15	13.1	0	6.16	0.95
6071007604	46.31	83.61	80-85%	San Bernardino	4806	14.34	75.2	10.47	55.89	25.45	4.47	2.31	5.6	6.28
6071007800	37.92	71.99	70-75%	San Bernardino	5698	15.15	76.43	8.42	25.25	44.26	14.58	0.7	11.25	3.95
6071007901	20.13	37.78	35-40%	San Bernardino	7394	11.98	71.48	16.54	33.26	44.5	7.36	0	11.92	2.98
6071007903	26.47	51.87	50-55%	San Bernardino	4512	15.07	73.14	11.79	31.29	47.63	8.09	0.78	9.42	2.79
6071007904	22.41	43.08	40-45%	San Bernardino	6378	11.62	78.03	10.35	34.12	48.04	7.34	0.36	6.41	3.73
6071008001	34.98	67.57	65-70%	San Bernardino	7008	12.09	70.99	16.92	47.36	31.06	1.14	0	16.92	3.51
6071008002	56.57	93.70	90-95%	San Bernardino	7585	16.89	75.61	7.5	66.54	18.29	9.2	0.25	4.38	1.34
6071008100	42.00	78.03	75-80%	San Bernardino	3048	13.42	75.85	10.73	48.36	35.93	5.02	0	8.27	2.43
6071008200	18.59	34.17	30-35%	San Bernardino	4865	7.98	65.24	26.78	16.03	75.87	4.13	0	3.19	0.78
6071008301	22.35	42.94	40-45%	San Bernardino	6422	15.71	60.57	23.72	26.99	59.14	1.34	0.23	7.04	5.26
6071008302	13.53	21.80	20-25%	San Bernardino	3467	13.41	66.43	20.16	10.73	82.03	2.22	0	3.49	1.53
6071008401	19.64	36.59	35-40%	San Bernardino	10335	10.24	77.77	11.99	35.88	47.21	3.95	0.21	9.05	3.7
6071008402	21.56	41.21	40-45%	San Bernardino	6968	11.88	75.83	12.28	30.04	57.66	2.58	0.1	5.96	3.66
6071008403	17.35	31.16	30-35%	San Bernardino	6201	13.11	66.51	20.38	17.55	59.88	11.79	0	7.05	3.74
6071008404	38.21	72.49	70-75%	San Bernardino	3010	15.05	77.38	7.57	52.23	26.18	14.12	0.43	5.12	1.93
6071008500	22.28	42.70	40-45%	San Bernardino	8540	10.74	69.41	19.85	13.69	70.97	0.96	0	10.71	3.67
6071008601	25.55	50.01	50-55%	San Bernardino	6112	12.42	78.17	9.41	40.35	42.08	3.89	0	7.41	6.27
6071008602	24.35	47.50	45-50%	San Bernardino	4182	10.5	70.8	18.7	36.56	49.62	2.7	0	7.22	3.9
6071008703	11.87	17.57	15-20%	San Bernardino	7573	10.01	64.07	25.92	18.59	72.63	1.8	0	3.92	3.06
6071008704	27.19	53.43	50-55%	San Bernardino	8118	12.47	74.46	13.07	33.96	59.61	0.42	0.52	4.57	0.92
6071008705	31.00	60.62	60-65%	San Bernardino	4795	12.62	75.29	12.1	36	57.35	0.02	3	1.36	2.27
6071008706	16.74	29.78	25-30%	San Bernardino	14184	19.87	69	11.13	32.49	58.9	1.57	0	4.67	2.37
6071008708	14.53	24.42	20-25%	San Bernardino	4304	12.83	74.67	12.5	28.35	66.5	0.35	0	3.83	0.98
6071008709	17.47	31.43	30-35%	San Bernardino	4035	8.62	74.6	16.78	35.66	56.53	4.04	0	2.65	1.12
6071008710	28.58	56.04	55-60%	San Bernardino	4417	10.94	70.52	18.54	53.18	41.02	1.95	0.66	0.95	2.24
6071008800	24.51	47.79	45-50%	San Bernardino	6286	15.11	73.35	11.53	43.48	53.04	1.94	0	1.2	0.33
6071008901	29.20	57.26	55-60%	San Bernardino	1954	11.92	70.73	17.35	18.27	72.42	5.17	0.46	1.69	2
6071009107	17.79	32.22	30-35%	San Bernardino	7661	10.79	69.33	19.88	34.32	59.54	0	0	5.6	0.55
6071009108	14.31	23.83	20-25%	San Bernardino	7605	17.83	71.65	10.52	49.82	44.79	1.54	0	2.89	0.96
6071009109	16.55	29.24	25-30%	San Bernardino	6639	16.39	68.34	15.27	26.72	63.68	1.16	0.17	5.09	3.18
6071009110	29.08	57.00	55-60%	San Bernardino	18069	19.89	74.02	6.09	51.6	16.4	21.77	0.09	6.2	3.94
6071009112	20.88	39.76	35-40%	San Bernardino	9555	20.17	74.93	4.9	70.44	7.9	14.15	0.08	2.09	5.33
6071009114	21.85	41.87	40-45%	San Bernardino	10227	19.94	71.71	8.35	65.13	12.68	17.33	0	1.63	3.23
6071009116	42.88	79.29	75-80%	San Bernardino	6700	18.93	75.9	5.18	57.76	13.42	25.04	0	2.49	1.28
6071009117	50.67	88.55	85-90%	San Bernardino	8697	15.93	79.23	4.84	60.02	22.39	14.57	0	1	2.02
6071009118	22.03	42.21	40-45%	San Bernardino	21531	15.46	77.66	6.88	51.73	25.88	15.06	0	3.85	3.46
6071009119	13.54	21.81	20-25%	San Bernardino	6128	16.43	73.22	10.35	40.39	53.75	2.19	0	1.02	2.64
6071009201	12.63	19.49	15-20%	San Bernardino	3984	17.22	63.15	19.63	20.36	74.57	0	0.33	0.68	4.07
6071009202	20.56	38.97	35-40%	San Bernardino	1858	3.44	77.61	18.95	16.79	66.31	0.32	0.48	15.61	0.48
6071009300	37.10	70.70	70-75%	San Bernardino	1037	9.93	68.95	21.12	53.71	41.56	3.57	0.29	0.19	0.68
6071009400	47.94	85.38	85-90%	San Bernardino	3262	19.5	72.5	8	44.45	25.02	24.83	1.13	1.38	3.19
6071009500	49.33	87.22	85-90%	San Bernardino	7903	18.63	70.58	10.79	40.44	23.91	21.71	0.77	0	13.16
6071009707	20.40	38.48	35-40%	San Bernardino	6433	6.93	50.6	42.47	23.35	65.72	5.7	0.25	4.73	0.25
6071009708	22.71	43.77	40-45%	San Bernardino	5488	11.17	72.5	16.33	21.36	75.02	1.46	0.29	0.6	1.28
6071009709	14.34	23.90	20-25%	San Bernardino	6657	13.22	75.05	11.73	45.76	45.41	7.24	0	0	1.59
6071009710	17.48	31.47	30-35%	San Bernardino	7740	20.48	70.7	8.82	42.97	35.09	14.06	0	3.02	4.86
6071009711	16.85	30.08	30-35%	San Bernardino	9766	13.78	69.64	16.58	30.71	51.46	9.74	0	5.34	2.74
6071009712	18.20	33.27	30-35%	San Bernardino	6196	15.69	71.72	12.59	44.37	45.21	5.54	0.66	0.68	3.55
6071009713	16.29	28.54	25-30%	San Bernardino	6537	11.87	75.17	12.96	39.07	47.42	6.73	0	1.99	4.79
6071009714	16.84	30.04	30-35%	San Bernardino	3920	14.26	69.18	16.56	43.8	42.09	7.96	0	2.81	3.34
6071009715	20.21	38.01	35-40%	San Bernardino	8818	17.78	63.22	19	38.46	51.42	5.67	2	0.94	1.52
6071009716	18.31	33.54	30-35%	San Bernardino	7658	19.44	70.1	10.46	47.36	37.31	10.69	0	1.37	3.26
6071009717	13.83	22.54	20-25%	San Bernardino	4216	13.76	71.75	14.49	36.55	54.39	5.6	0	2.33	1.14
6071009800	49.13	86.90	85-90%	San Bernardino	4820	23.71	67.88	8.4	68.98	15.83	11.91	0.33	0.98	1.97
6071009904	41.33	77.12	75-80%	San Bernardino	13319	27.87	64.69	7.44	61.39	18.13	16.21	0	1.42	2.85

6071009905	43.01	79.48	75-80%	San Bernardino	7795	19.88	72.83	7.29	57.08	18.08	16.02	0	4.3	4.53
6071009906	22.54	43.39	40-45%	San Bernardino	5087	13.92	74.8	11.28	50.68	23.94	15.9	0	6.41	3.07
6071009908	25.51	49.87	45-50%	San Bernardino	4509	19.25	69.75	11	53.54	31	11.67	0	2.22	1.57
6071009910	30.65	59.98	55-60%	San Bernardino	5851	15.71	73.27	11.02	61.56	22.54	10.25	0	2.82	2.82
6071009911	15.62	26.94	25-30%	San Bernardino	7388	16.8	73.9	9.3	56.32	21.91	12.03	0.12	3.21	6.4
6071009912	45.97	83.22	80-85%	San Bernardino	4745	15.22	70.33	14.46	46.28	28.64	20.27	0	3.71	1.1
6071009913	40.36	75.57	75-80%	San Bernardino	5926	16.87	67.25	15.88	57.04	25.73	13.84	0.03	0.37	2.99
6071010004	20.16	37.90	35-40%	San Bernardino	8600	8.15	71.81	20.03	21.95	67.87	5.17	2.19	2.81	0
6071010009	26.47	51.88	50-55%	San Bernardino	4025	19.08	68.92	12	55.7	34.71	6.24	0	0.97	2.39
6071010010	25.89	50.78	50-55%	San Bernardino	6458	18.07	68.83	13.1	70.24	24.98	2.52	0	1.75	0.51
6071010011	35.62	68.61	65-70%	San Bernardino	5540	16.46	76.23	7.31	59.33	29.31	5.43	0	3.88	2.04
6071010012	28.12	55.22	55-60%	San Bernardino	4965	16.7	69.97	13.33	54.76	39.25	3.36	0	0.83	1.79
6071010013	30.99	60.60	60-65%	San Bernardino	8283	9.24	79.92	10.84	60.58	33.21	2.67	0.42	1.84	1.28
6071010014	32.18	62.73	60-65%	San Bernardino	4933	17.37	76.69	5.94	75.33	16.74	5.45	0.63	1.58	0.26
6071010015	25.73	50.47	50-55%	San Bernardino	6315	13.82	76.58	9.6	70.58	27.49	0.84	0	0.56	0.54
6071010016	22.53	43.29	40-45%	San Bernardino	6086	18.06	74.45	7.49	61.62	27.56	5.83	0	3.99	1
6071010017	20.47	38.64	35-40%	San Bernardino	16448	13.46	74.91	11.63	52.07	32.44	4.37	4.6	4.19	2.33
6071010018	22.05	42.22	40-45%	San Bernardino	7323	16.02	73.69	10.3	58.28	26.7	6.19	0.52	7.13	1.19
6071010019	30.83	60.35	60-65%	San Bernardino	4911	12.69	75.36	11.95	63.16	32.82	1.45	0	1.22	1.34
6071010020	26.25	51.42	50-55%	San Bernardino	8328	23.46	65.72	10.82	60.18	24.83	10.21	0	0.52	4.26
6071010021	15.48	26.58	25-30%	San Bernardino	6713	12.42	73.71	13.87	48.88	46.7	1.85	0.09	2.49	0
6071010022	18.72	34.56	30-35%	San Bernardino	4692	22.08	65.03	12.89	51.07	44.44	1.07	1.32	1.11	1
6071010023	23.19	44.89	40-45%	San Bernardino	5962	15.48	73.72	10.8	50.7	41.48	1.51	0.23	2.58	3.49
6071010024	22.60	43.47	40-45%	San Bernardino	5354	14.57	70.43	15	35.75	57.42	2.95	0	0.99	2.9
6071010025	34.90	67.41	65-70%	San Bernardino	8440	14.19	70.31	15.5	59.8	21.4	10.51	0.44	4.36	3.5
6071010026	30.21	59.10	55-60%	San Bernardino	11255	15.83	73.43	10.73	49.65	27.16	16.03	0	4.58	2.58
6071010300	40.27	75.43	75-80%	San Bernardino	3547	13.36	69.27	17.37	26.7	60.87	3.24	1.89	6.43	0.87
6071010402	16.90	30.23	30-35%	San Bernardino	9593	20.66	79.34	0	23.73	61.42	5.86	1.64	3.08	4.27
6071010409	22.81	43.99	40-45%	San Bernardino	3096	20.54	64.24	15.21	16.41	52.23	11.43	0	15.57	4.36
6071010410	17.77	32.17	30-35%	San Bernardino	3126	12.76	73.42	13.82	22.55	68.11	3.33	0.96	1.47	3.58
6071010411	23.77	46.15	45-50%	San Bernardino	6659	12.69	62.23	25.08	18.47	70.61	2.93	0	4.12	3.87
6071010412	16.06	28.04	25-30%	San Bernardino	7582	13.69	69.65	16.66	15.26	68.2	8.61	1.19	2.8	3.94
6071010413	14.96	25.44	25-30%	San Bernardino	7226	12.08	68.88	19.04	32.98	56.93	6.84	0.82	0.46	1.98
6071010415	13.08	20.73	20-25%	San Bernardino	5316	14.3	77.28	8.43	17.74	57.96	4.46	0.43	12.13	7.28
6071010416	19.13	35.48	35-40%	San Bernardino	3094	16.29	66.74	16.97	13.38	74.79	2.75	1.68	4.78	2.62
6071010417	16.06	28.01	25-30%	San Bernardino	2931	11.02	69.02	19.96	14.91	81.54	0.38	0	0.65	2.52
6071010419	17.44	31.35	30-35%	San Bernardino	4903	12.46	68.55	18.99	21.01	73.18	0.45	0.22	0.33	4.81
6071010420	18.61	34.27	30-35%	San Bernardino	3961	14.95	63.34	21.71	17.65	74.53	1.19	0.25	3.28	3.11
6071010421	18.55	34.08	30-35%	San Bernardino	6003	22.92	70	7.08	32.47	42.16	18.57	0	2.17	4.63
6071010422	15.89	27.57	25-30%	San Bernardino	1859	20.12	65.47	14.42	28.78	51.32	12.37	1.18	4.15	2.21
6071010423	18.81	34.78	30-35%	San Bernardino	3461	4.91	66.43	28.66	17.8	73.39	2.25	1.99	1.1	3.47
6071010424	29.24	57.31	55-60%	San Bernardino	2078	10.78	59.24	29.98	20.55	73	1.06	1.4	2.16	1.83
6071010700	34.09	66.04	65-70%	San Bernardino	4011	18.45	65.42	16.13	20.12	68.56	3.34	4.64	0.52	2.82
6071010802	26.77	52.58	50-55%	San Bernardino	3820	5.65	76.68	17.67	21.7	74.63	3.66	0	0	0
6071010803	20.58	39.01	35-40%	San Bernardino	3171	12.24	69.63	18.13	23.4	71.81	0.85	2.21	0.79	0.95
6071010804	22.32	42.83	40-45%	San Bernardino	2620	10.38	76.49	13.13	16.3	74.27	1.6	1.11	2.56	4.16
6071010901	14.05	23.17	20-25%	San Bernardino	4121	9.51	60.76	29.73	14.88	79.11	1.75	1.72	1.67	0.87
6071010902	25.72	50.42	50-55%	San Bernardino	2097	10.4	69.72	19.89	23.13	67.53	0.33	0	3.57	5.44
6071011001	25.49	49.84	45-50%	San Bernardino	1929	7.21	79.99	12.8	30.38	63.66	0.31	0.83	0	4.82
6071011002	22.54	43.34	40-45%	San Bernardino	1423	9.56	69.99	20.45	28.67	60.58	3.37	0.91	2.25	4.22
6071011101	30.65	60.00	55-60%	San Bernardino	3232	13.3	66.24	20.45	11.91	73.42	1.49	1.11	7.36	4.7
6071011102	18.53	33.99	30-35%	San Bernardino	1760	21.02	60.51	18.47	16.7	61.14	4.89	0	4.66	12.61
6071011203	27.12	53.27	50-55%	San Bernardino	1404	10.26	60.68	29.06	28.92	69.94	0.28	0.57	0	0.28
6071011204	13.99	23.00	20-25%	San Bernardino	1685	7.18	74.78	18.04	26.35	70.03	0	2.2	0.77	0.65
6071011205	25.94	50.86	50-55%	San Bernardino	1163	12.98	68.27	18.74	30.7	62.94	0.6	0.77	4.99	0
6071011206	20.84	39.67	35-40%	San Bernardino	951	12.72	68.66	18.61	30.81	60.46	0	0	7.68	1.05
6071011300	25.99	50.97	50-55%	San Bernardino	1398	7.65	52.58	39.77	16.81	80.9	0.07	0	0	2.22
6071011401	27.73	54.37	50-55%	San Bernardino	4507	13.96	69.4	16.64	36.12	58.15	0.18	0.47	1	4.08

6071011403	11.56	16.77	15-20%	San Bernardino	3451	13.71	64.36	21.94	25.38	70.88	2.75	0.75	0.23	0
6071011404	12.33	18.78	15-20%	San Bernardino	4585	14.61	66.96	18.43	19.5	76.92	1.26	0.15	0.48	1.68
6071011500	14.53	24.41	20-25%	San Bernardino	2125	12.24	72.24	15.53	14.87	80.66	0.47	0.28	1.6	2.12
6071011600	28.96	56.86	55-60%	San Bernardino	8488	15.94	62.57	21.49	26.47	61.48	5.63	0	2.71	3.71
6071011700	44.32	81.27	80-85%	San Bernardino	1660	7.95	73.86	18.19	49.22	41.02	0.42	0.9	1.08	7.35
6071011800	31.88	62.20	60-65%	San Bernardino	7733	15.6	73.41	10.99	45.18	44.51	6.62	0.03	1.37	2.29
6071011900	42.07	78.19	75-80%	San Bernardino	2645	16.82	70.59	12.59	45.03	43.02	5.22	2.42	0.98	3.33
6071012001	30.97	60.58	60-65%	San Bernardino	5815	15.2	73.5	11.3	45.98	23.51	14.17	0.65	12.1	3.58
6071012002	45.66	82.80	80-85%	San Bernardino	5653	21.42	64.85	13.73	53.9	28.06	11.07	2.92	1.26	2.79
6071012101	33.42	64.84	60-65%	San Bernardino	5860	18.38	63.65	17.97	22.34	54.28	10.6	0	2.12	10.67
6071012103	28.97	56.87	55-60%	San Bernardino	3562	15.44	63.67	20.89	20.86	68.84	2.89	2.55	2.84	2.02
6071012104	28.75	56.43	55-60%	San Bernardino	5280	12.23	68.22	19.55	29.38	62.31	6.69	0.44	0.17	1.02
6071012200	27.11	53.25	50-55%	San Bernardino	18685	5.51	82.35	12.14	36.46	25.57	13.01	0.62	18.24	6.11
6071012300	NA	NA	NA	San Bernardino	4966	0.2	92.95	6.85	28.37	31.45	30.81	0.93	3.51	4.93
6071012400	62.13	96.56	95-100% (highest scores)	San Bernardino	3386	14.97	76.99	8.03	83.79	11.05	2.13	0	1.36	1.68
6071012500	66.69	98.32	95-100% (highest scores)	San Bernardino	4972	16.37	71	12.63	93.04	6.3	0.52	0	0.14	0
6071012700	33.47	64.90	60-65%	San Bernardino	3920	14.26	77.55	8.19	60.59	25.26	5.51	0	6.66	1.99
6071025000	23.79	46.19	45-50%	San Bernardino	9872	27.72	71.38	0.89	18.55	47.86	17.04	0.24	7.7	8.61
6071025100	33.68	65.25	65-70%	San Bernardino	1343	10.42	55.32	34.25	16.23	49.22	1.04	29.78	0.6	3.13
6071940100	6.02	4.68	1-5% (lowest scores)	San Bernardino	1312	11.05	58.23	30.72	14.71	79.5	0.53	3.05	0.38	1.83
6071980100	NA	NA	NA	San Bernardino	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
6071980200	NA	NA	NA	San Bernardino	3817	0	96.78	3.22	48	15.69	26.96	3.14	3.22	2.99
6073000100	6.98	6.74	5-10%	San Diego	3093	11.09	55.54	33.37	15.81	77.24	0	0	3.62	3.33
6073000201	13.21	20.94	20-25%	San Diego	1891	7.77	61.5	30.72	7.4	82.97	0.53	0.58	3.97	4.55
6073000202	13.66	22.10	20-25%	San Diego	4542	4.51	80.45	15.04	13.56	74.64	0.09	0	8.41	3.3
6073000300	22.77	43.91	40-45%	San Diego	5239	4.12	73.83	22.05	16.63	72.91	5.08	0	2.92	2.46
6073000400	19.82	36.99	35-40%	San Diego	3801	3.79	86.64	9.58	23.26	56.51	6	0	11.31	2.92
6073000500	18.09	32.97	30-35%	San Diego	3151	7.3	78.39	14.31	17.71	73.06	1.11	0.89	5.62	1.62
6073000600	12.76	19.83	15-20%	San Diego	3207	5.83	82.94	11.23	22.39	62.21	3.18	0.25	6.08	5.89
6073000700	22.70	43.75	40-45%	San Diego	4624	8.65	78.05	13.3	20.72	64.73	2.23	0.43	7.57	4.33
6073000800	10.20	13.43	10-15%	San Diego	5178	8.13	80.4	11.47	23.83	65.86	4.44	0	3.42	2.45
6073000900	11.66	16.92	15-20%	San Diego	5741	5.77	85.51	8.73	27.83	47.71	12.37	0.51	9.34	2.25
6073001000	9.09	10.80	10-15%	San Diego	4472	7.02	84.06	8.92	31.02	52.1	2.5	0.65	5.14	8.59
6073001100	8.47	9.59	5-10%	San Diego	3168	5.71	86.36	7.92	19.16	61.24	8.93	1.29	6.25	3.13
6073001200	14.44	24.14	20-25%	San Diego	6037	11.26	81.3	7.44	43.61	40.12	8.56	0.6	5.45	1.66
6073001300	18.96	35.02	35-40%	San Diego	6256	7.82	86.03	6.15	29.94	51.45	8.41	0	8.84	1.36
6073001400	11.26	16.06	15-20%	San Diego	3456	10.01	80.76	9.23	20.11	66.41	1.48	0	5.99	6.02
6073001500	23.81	46.24	45-50%	San Diego	3827	9.93	81.11	8.96	24.3	59.16	3.5	0.44	5.67	6.92
6073001600	37.28	70.93	70-75%	San Diego	5821	13.98	75.67	10.34	49.15	25.55	16.03	0	6.82	2.46
6073001700	19.03	35.22	35-40%	San Diego	4448	6.77	88.65	4.59	41.34	45.53	8.32	0	1.71	3.1
6073001800	19.80	36.96	35-40%	San Diego	5417	11.06	79.25	9.69	35.87	40.48	13.79	0.24	6.15	3.47
6073001900	8.79	10.16	10-15%	San Diego	3271	6.6	78.6	14.8	21.49	66.46	4.04	0	5.07	2.93
6073002001	6.31	5.36	5-10%	San Diego	3306	10.25	64.16	25.59	6.72	81.06	2.51	0	4.44	5.26
6073002002	10.21	13.50	10-15%	San Diego	2610	11.92	76.48	11.61	17.55	71.15	3.14	0.65	5.52	1.99
6073002100	19.48	36.20	35-40%	San Diego	5471	4.24	85.47	10.29	30.65	43.96	11.88	0.48	7.59	5.45
6073002201	39.05	73.56	70-75%	San Diego	3328	15.41	78.19	6.4	51.44	9.41	18.12	0	17.7	3.34
6073002202	42.42	78.58	75-80%	San Diego	5477	17.71	69.31	12.98	70.99	8.58	4.71	0	13.78	1.94
6073002301	22.90	44.23	40-45%	San Diego	3073	15.23	75.46	9.31	49.53	19.3	15.23	0	13.66	2.28
6073002302	30.63	59.91	55-60%	San Diego	7300	17.67	74.66	7.67	71.1	9.32	5.1	0	13.64	0.85
6073002401	36.46	69.82	65-70%	San Diego	4791	11.81	82.99	5.2	58.32	27.61	3.67	0	7.51	2.88
6073002402	46.22	83.51	80-85%	San Diego	5189	14.22	78.49	7.28	71.46	4.53	10.29	0	13.16	0.56
6073002501	44.82	81.74	80-85%	San Diego	5406	12.87	78.47	8.66	58.73	13.28	12.62	0	13.8	1.57
6073002502	48.88	86.60	85-90%	San Diego	6479	12.32	76.97	10.71	48.83	27.72	10.76	0.11	10.38	2.21
6073002601	30.76	60.19	60-65%	San Diego	5609	13.59	79.19	7.22	64	6.44	1.66	0	23.94	3.96
6073002602	30.94	60.50	60-65%	San Diego	4452	14.98	79.22	5.8	63.1	11.64	8.31	0	16.49	0.47
6073002702	25.98	50.92	50-55%	San Diego	6350	11.06	78.77	10.17	28.74	29.13	21.28	0.38	14.52	5.95
6073002703	33.31	64.57	60-65%	San Diego	7083	7.45	81.22	11.32	41.15	25.85	8.22	0.25	21.56	2.96
6073002705	35.25	67.95	65-70%	San Diego	4133	5.3	76.07	18.63	27.99	14.32	16.48	0	37.72	3.48

6073002707	29.47	57.74	55-60%	San Diego	5405	19.07	74.32	6.6	57.95	11.79	11.12	0.04	18.7	0.41
6073002708	33.76	65.44	65-70%	San Diego	5395	12.46	78.44	9.1	48.54	8.03	21.28	0.48	20	1.67
6073002709	31.05	60.77	60-65%	San Diego	4470	20.49	74.56	4.94	53.98	10.83	22.55	0	10.72	1.92
6073002710	31.72	61.86	60-65%	San Diego	4640	16.64	73.21	10.15	37.95	10.67	20.86	0	30.34	0.17
6073002711	40.93	76.51	75-80%	San Diego	3279	20.77	73.13	6.1	32.88	19.61	15.34	0	27.9	4.27
6073002712	49.26	87.13	85-90%	San Diego	5658	13.63	70.7	15.68	36.06	15.22	29.76	0	13.22	5.74
6073002801	31.29	61.17	60-65%	San Diego	3214	4.42	86.87	8.71	15.25	56.94	2.52	0.56	15.84	8.9
6073002803	18.77	34.68	30-35%	San Diego	4897	12.23	71.49	16.28	28.06	42.31	8.13	0	19.3	2.21
6073002804	24.07	46.87	45-50%	San Diego	5750	9.18	83.44	7.37	16.16	67.11	7.2	0	4.63	4.9
6073002902	20.49	38.78	35-40%	San Diego	7598	9.57	80.72	9.71	31.02	38.67	12.4	0	11.82	6.09
6073002903	34.50	66.69	65-70%	San Diego	4031	10.05	78.44	11.51	41.55	33.76	9.53	0.35	12.6	2.21
6073002904	26.59	52.21	50-55%	San Diego	10078	3.8	93.31	2.89	16.35	60.69	8.73	0	12.55	1.68
6073002905	20.18	37.93	35-40%	San Diego	4278	9.51	82.3	8.18	23.45	48.08	11.06	0	7.53	9.89
6073003001	43.74	80.40	80-85%	San Diego	4664	13.83	73.03	13.14	43.29	8.79	37.01	0.26	8.68	1.97
6073003003	38.03	72.21	70-75%	San Diego	5719	13.59	73.44	12.97	52.19	22.59	16.84	0.59	6.4	1.38
6073003004	29.50	57.84	55-60%	San Diego	5264	12.58	79.35	8.07	69.68	5.79	18.2	0	3.65	2.68
6073003101	35.08	67.69	65-70%	San Diego	4041	14.7	74.02	11.28	57.93	2.99	33.43	0	3.14	2.5
6073003103	32.02	62.44	60-65%	San Diego	6105	10.07	75.02	14.91	43.54	7.78	29.22	0	16.02	3.44
6073003105	23.27	45.07	45-50%	San Diego	4664	18.93	68.76	12.31	66.6	12.8	6.43	0.26	9.43	4.48
6073003107	21.95	41.99	40-45%	San Diego	6145	7.88	75.82	16.31	35.57	13.59	23.25	0	23.52	4.07
6073003108	28.68	56.30	55-60%	San Diego	3797	16.88	73.37	9.74	58.1	20.04	7.72	0	12.38	1.76
6073003109	18.99	35.12	35-40%	San Diego	3258	8.01	73.97	18.02	9.73	10.74	7.98	0	66.63	4.91
6073003111	38.36	72.73	70-75%	San Diego	6402	16.79	71.27	11.93	56.78	6.22	14.31	0	19.79	2.91
6073003112	27.56	54.05	50-55%	San Diego	4456	12.77	73.9	13.33	42.68	10.05	21.72	4.02	20.76	0.76
6073003113	20.96	39.94	35-40%	San Diego	5420	7.07	75.35	17.58	20.76	7.47	12.88	0	53.67	5.22
6073003114	22.07	42.27	40-45%	San Diego	3462	9.3	75.01	15.68	16.06	8.52	18.37	1.04	50.58	5.43
6073003115	30.82	60.34	60-65%	San Diego	6874	12.05	74.79	13.17	39.44	9.4	16.85	0	31.82	2.5
6073003201	26.72	52.45	50-55%	San Diego	5157	22.45	68.33	9.21	40.53	18.67	13.9	0	23.68	3.22
6073003202	30.96	60.56	60-65%	San Diego	4297	10.03	75.22	14.75	70.96	11.12	4.05	0.19	12.03	1.65
6073003204	19.61	36.51	35-40%	San Diego	3285	8.52	71.11	20.37	58.81	29.59	4.11	0	5.78	1.7
6073003207	17.28	31.03	30-35%	San Diego	6278	7.9	75.23	16.87	50.11	20.88	2.34	0	24.54	2.12
6073003208	27.87	54.68	50-55%	San Diego	6658	10.78	76.78	12.44	38.4	14.04	17.92	0	24.48	5.15
6073003209	26.40	51.63	50-55%	San Diego	5469	10.75	79.17	10.07	34.3	5.39	12.87	0	42.06	5.38
6073003211	21.85	41.86	40-45%	San Diego	3555	11.48	73.73	14.8	59.69	16.88	3.68	0	16.71	3.04
6073003212	18.01	32.77	30-35%	San Diego	4154	7.82	74.7	17.48	40.66	12.33	10.28	0	30.53	6.21
6073003213	18.73	34.58	30-35%	San Diego	4582	10.91	73.61	15.47	19.21	9.49	15.89	0	52.12	3.3
6073003214	22.82	44.01	40-45%	San Diego	5314	15.54	70.85	13.61	38.48	12.87	23.81	0	20.02	4.82
6073003301	50.00	87.88	85-90%	San Diego	3820	20.99	73.43	5.58	74.63	1.96	21.28	0	0	2.12
6073003303	45.52	82.59	80-85%	San Diego	4821	20.43	71.69	7.88	75.15	8.57	7.28	0	8.07	0.93
6073003304	40.09	75.05	75-80%	San Diego	4099	15.27	77.21	7.51	64.21	5.44	11.54	0	13.47	5.34
6073003305	43.21	79.82	75-80%	San Diego	6601	19.03	72.6	8.38	57.99	5.7	27.81	0	8.09	0.41
6073003401	37.18	70.78	70-75%	San Diego	6382	13.8	73	13.19	39.27	18.63	28.91	0	11.08	2.12
6073003403	52.34	90.38	90-95%	San Diego	4094	17.02	73.47	9.5	74.69	12.99	9.04	0	2.42	0.85
6073003404	53.07	90.92	90-95%	San Diego	5062	13.47	75.21	11.32	68.85	3.85	11.68	0.93	13.43	1.26
6073003501	50.35	88.26	85-90%	San Diego	4929	14.3	78.9	6.8	84.48	5.7	4.38	0	1.66	3.77
6073003502	48.78	86.49	85-90%	San Diego	4754	16.01	76.13	7.87	85.59	4.02	8.81	0	0.95	0.63
6073003601	65.81	98.03	95-100% (highest scores)	San Diego	3006	15.6	76.61	7.78	85.1	2.83	10.98	0	1.06	0.03
6073003602	44.61	81.52	80-85%	San Diego	3427	13.66	76.89	9.45	86.87	2.83	4.41	0	2.13	3.76
6073003603	51.50	89.46	85-90%	San Diego	3907	16.18	76.55	7.27	90.76	2.05	3.15	0	4.04	0
6073003800	NA	NA	NA	San Diego	6372	0	100	0	21.2	46.23	19.63	0.94	9.45	2.54
6073003901	54.03	91.72	90-95%	San Diego	4379	14.91	79.26	5.82	85.18	4.18	7.83	0	1.26	1.55
6073003902	60.44	95.95	95-100% (highest scores)	San Diego	4388	20.44	72.68	6.88	91.18	2.85	5.31	0	0.66	0
6073004000	43.75	80.46	80-85%	San Diego	4513	13.63	79.48	6.89	89.7	2.02	4.01	0.51	3.12	0.64
6073004100	37.42	71.26	70-75%	San Diego	7307	12.51	80.8	6.69	42.58	36.51	10.36	0.7	6.12	3.74
6073004200	18.49	33.93	30-35%	San Diego	6291	14.67	70.7	14.62	28.6	54.97	7.6	0	0.83	8.01
6073004300	17.58	31.77	30-35%	San Diego	3943	9.33	78.49	12.17	20.64	68.1	3.47	0	5.93	1.85
6073004400	16.54	29.20	25-30%	San Diego	4099	10.91	76.85	12.25	26.23	64.89	1.41	0.32	5.12	2.02
6073004501	23.83	46.32	45-50%	San Diego	2505	1.96	92.38	5.67	53.41	36.69	1.36	0.96	4.27	3.31

6073004600	31.61	61.65	60-65%	San Diego	2004	5.04	85.93	9.03	33.83	48.1	7.78	1.05	5.09	4.14
6073004700	41.48	77.29	75-80%	San Diego	1703	12.92	76.16	10.92	71.93	18.85	4.11	0	1.58	3.52
6073004800	48.60	86.22	85-90%	San Diego	4171	14.55	77.78	7.67	86.81	8.06	2.88	0.19	0.34	1.73
6073004900	61.14	96.28	95-100% (highest scores)	San Diego	5505	15.71	74.66	9.63	85.89	9.43	3.09	0	1.09	0.51
6073005000	62.51	96.81	95-100% (highest scores)	San Diego	2195	15.58	73.85	10.57	85.01	12.53	1.23	0	1.23	0
6073005100	47.28	84.77	80-85%	San Diego	7702	7.89	83.2	8.91	33	41.39	12.97	0.14	8.74	3.75
6073005200	33.15	64.33	60-65%	San Diego	7087	5.25	85.76	8.99	21.96	49.54	13.5	0.75	9.54	4.71
6073005300	36.85	70.36	70-75%	San Diego	5847	1.35	84.9	13.75	23.89	53.82	10.23	0	7.84	4.22
6073005400	32.51	63.31	60-65%	San Diego	7888	2.33	70.2	27.47	13.93	67.08	7.52	0	9.64	1.83
6073005500	NA	NA	NA	San Diego	285	0	100	0	34.74	33.33	23.16	2.81	4.21	1.75
6073005600	22.82	44.00	40-45%	San Diego	4587	6.39	74.51	19.1	23.54	61.76	4.05	0.33	8.07	2.25
6073005700	38.55	72.95	70-75%	San Diego	1590	2.08	78.62	19.31	15.53	59.94	9.75	0.69	8.05	6.04
6073005800	25.67	50.29	50-55%	San Diego	3953	3.39	91.12	5.49	19.3	69.34	2.68	0	6.48	2.2
6073005900	26.88	52.80	50-55%	San Diego	3344	1.29	80.95	17.76	23.33	66.39	3.23	0.54	3.98	2.54
6073006000	9.38	11.35	10-15%	San Diego	3816	6.47	63.02	30.5	8.54	78.56	1.28	0	9.8	1.81
6073006100	21.17	40.37	40-45%	San Diego	2370	9.11	73.04	17.85	20.38	61.52	9.37	1.77	3.46	3.5
6073006200	NA	NA	NA	San Diego	23	0	100	0	26.09	73.91	0	0	0	0
6073006300	NA	NA	NA	San Diego	3760	0	100	0	25.64	60.85	8.16	0.85	1.41	3.09
6073006500	28.03	55.03	55-60%	San Diego	3359	6.64	68.26	25.1	19.98	57.93	13.22	0	5.78	3.1
6073006600	27.08	53.23	50-55%	San Diego	1811	41.8	57.87	0.33	26.89	42.57	14.74	0	9.22	6.57
6073006801	16.95	30.35	30-35%	San Diego	2971	9.16	77.25	13.6	8.48	68.93	9.56	0.54	4.61	7.88
6073006802	29.17	57.21	55-60%	San Diego	5883	5.18	86.98	7.84	20.16	60.55	6.53	0.03	9	3.72
6073006900	11.98	17.89	15-20%	San Diego	5854	11.17	74.8	14.02	11	77.14	0.34	0.34	5.47	5.71
6073007002	7.46	7.54	5-10%	San Diego	3114	11.82	62.59	25.59	9.38	76.85	6.81	0	4.69	2.28
6073007100	7.32	7.39	5-10%	San Diego	4535	9.64	55.68	34.69	7.7	85.98	2.8	0	0.73	2.8
6073007200	3.94	1.41	1-5% (lowest scores)	San Diego	6054	8.49	73.72	17.79	14.37	75.65	1.27	0.23	4.62	3.85
6073007301	6.43	5.60	5-10%	San Diego	5413	6.58	81.23	12.19	10.99	81.6	0.98	0	3.51	2.92
6073007302	4.07	1.64	1-5% (lowest scores)	San Diego	2268	11.73	66.75	21.52	6.88	87.21	0.53	0	0.88	4.5
6073007400	10.13	13.24	10-15%	San Diego	7540	10.28	81.01	8.71	13.66	76.13	0.66	2.23	5.36	1.96
6073007501	9.15	10.97	10-15%	San Diego	4244	4.03	88.27	7.7	15.55	78.16	2.73	0	1.41	2.14
6073007502	6.28	5.31	5-10%	San Diego	3319	7.35	84.03	8.62	10.3	77.37	3.86	0.54	4.22	3.71
6073007600	13.33	21.29	20-25%	San Diego	3978	2.41	82.43	15.16	12.37	78.98	1.23	0	4.95	2.46
6073007701	7.82	8.19	5-10%	San Diego	3673	4.68	82.88	12.44	6.81	77.89	2.34	1.03	5.8	6.13
6073007702	5.79	4.29	1-5% (lowest scores)	San Diego	4016	10.61	80.08	9.31	8.22	85.18	0.67	0	4.06	1.87
6073007800	12.02	18.05	15-20%	San Diego	6155	13.03	79.43	7.54	29.46	59.64	2.7	0	3.77	4.44
6073007903	10.79	14.95	10-15%	San Diego	4318	5.84	85.16	9.01	15.77	73.23	1.62	0	7.32	2.06
6073007905	7.16	7.09	5-10%	San Diego	2659	5	89.21	5.79	12.34	83.15	0.56	0.26	1.81	1.88
6073007907	13.04	20.65	20-25%	San Diego	3576	3.27	92.31	4.42	18.68	69.77	0.64	0	2.97	7.94
6073007908	14.32	23.85	20-25%	San Diego	3726	7.97	88.03	4	31.96	61.78	1.29	0	2.44	2.52
6073007910	6.80	6.39	5-10%	San Diego	2937	3.03	87.71	9.26	8.21	81.85	1.02	0	6.3	2.62
6073008002	4.58	2.37	1-5% (lowest scores)	San Diego	3004	12.45	71.67	15.88	9.85	83.26	0.6	0.8	1.9	3.6
6073008003	5.87	4.45	1-5% (lowest scores)	San Diego	3845	8.66	81.59	9.75	14.17	76.75	0	0	3.28	5.8
6073008006	3.74	1.15	1-5% (lowest scores)	San Diego	3903	8.05	78.84	13.12	9.61	82.5	1.28	0	4.97	1.64
6073008101	8.74	10.06	10-15%	San Diego	3760	5.05	76.46	18.48	7.5	87.55	0.51	0	1.84	2.61
6073008102	3.38	0.95	1-5% (lowest scores)	San Diego	3413	11.34	70.44	18.22	6.97	82.77	0	0	2.67	7.59
6073008200	7.14	7.02	5-10%	San Diego	2970	7.54	56.87	35.59	10.64	82.32	1.18	0	4.75	1.11
6073008301	3.61	1.10	1-5% (lowest scores)	San Diego	2924	8.48	55.78	35.74	11.94	75.41	2.02	0	5.03	5.61
6073008303	4.08	1.68	1-5% (lowest scores)	San Diego	3496	5.86	54.69	39.45	8.07	78.6	0.31	0	8.64	4.38
6073008305	14.67	24.72	20-25%	San Diego	1460	16.85	77.6	5.55	26.3	38.42	4.45	0	29.04	1.78
6073008306	7.97	8.43	5-10%	San Diego	3191	12.6	60.58	26.83	8.46	78.82	0	0	5.11	7.62
6073008307	9.84	12.49	10-15%	San Diego	3914	9.07	66.22	24.71	13.31	70.08	2.02	3.91	6.11	4.57
6073008310	4.06	1.61	1-5% (lowest scores)	San Diego	5725	14.62	56.84	28.54	14.36	67.41	5.38	0	9.28	3.58
6073008311	1.67	0.13	1-5% (lowest scores)	San Diego	2936	11.75	57.94	30.31	8.38	84.43	0.17	0.27	4.12	2.62
6073008312	14.25	23.73	20-25%	San Diego	3528	6.89	61.71	31.41	7.03	76.16	0.96	0	11.42	4.42
6073008313	5.92	4.54	1-5% (lowest scores)	San Diego	2214	10.07	61.65	28.27	9.49	74.89	0.72	0	11.56	3.34
6073008324	8.54	9.71	5-10%	San Diego	7226	11.74	65.73	22.53	4.76	77.83	1.83	0	11.1	4.48
6073008327	6.58	5.90	5-10%	San Diego	5881	13.23	73.32	13.45	6.78	67.18	0.71	0	22.16	3.16
6073008328	5.13	3.23	1-5% (lowest scores)	San Diego	6440	13.45	75.64	10.92	7.3	48.07	0	0	37.56	7.07

6073008329	5.78	4.26	1-5% (lowest scores)	San Diego	7256	17.16	77.51	5.33	9.94	60.89	3.38	0	20.42	5.37
6073008330	6.02	4.66	1-5% (lowest scores)	San Diego	5271	14.76	72.42	12.82	5.92	53.1	0.25	0	36.08	4.65
6073008331	3.20	0.81	1-5% (lowest scores)	San Diego	2621	13.16	75.62	11.22	9.12	68.64	0	0	16.44	5.8
6073008333	6.25	5.21	5-10%	San Diego	16363	12.86	81.51	5.63	8.24	53.06	0.68	0.58	33.18	4.26
6073008335	7.40	7.45	5-10%	San Diego	10138	13.97	77.64	8.39	11.72	40.99	1.84	1.07	37.89	6.48
6073008336	4.48	2.26	1-5% (lowest scores)	San Diego	2423	11.1	75.24	13.66	8.83	64.38	0	1.2	21.29	4.29
6073008337	6.85	6.52	5-10%	San Diego	4660	10.24	74.33	15.43	10.62	53.82	1.18	0	30.17	4.21
6073008339	28.64	56.19	55-60%	San Diego	1987	6.09	91.34	2.57	13.29	51.59	1.51	0	29.39	4.23
6073008340	15.16	25.92	25-30%	San Diego	9762	9.33	83.71	6.96	10.36	45.06	3.67	0	35.8	5.11
6073008341	16.94	30.33	30-35%	San Diego	8348	5.1	83.9	11	6.11	33.04	1.07	0	54.29	5.5
6073008343	9.43	11.51	10-15%	San Diego	5067	8.01	83.4	8.58	18.73	44.62	0.99	0	31.24	4.42
6073008344	7.66	7.99	5-10%	San Diego	3764	8.77	70.59	20.64	9.8	65.86	2.74	1.09	15.38	5.13
6073008345	14.85	25.15	25-30%	San Diego	4012	4.66	67.85	27.49	12.24	69.49	2.34	0	13.61	2.32
6073008346	6.36	5.43	5-10%	San Diego	4910	11.73	74.83	13.44	6.86	44.46	0.43	0	44.78	3.46
6073008347	8.40	9.42	5-10%	San Diego	7480	10.29	76.3	13.41	15.47	26.14	1.66	0.12	47.09	9.53
6073008348	9.92	12.72	10-15%	San Diego	5691	8.08	79.14	12.77	10.72	21.68	2.62	0	56.65	8.33
6073008349	11.97	17.84	15-20%	San Diego	3841	11.48	70.4	18.12	13.04	29.78	2.84	0	49.18	5.15
6073008350	19.09	35.36	35-40%	San Diego	6979	11.22	77.37	11.41	5.99	33.86	2.22	0.29	52.08	5.57
6073008351	15.16	25.90	25-30%	San Diego	4225	8.28	78.6	13.11	8.19	27.34	4.95	0.85	52.8	5.87
6073008352	13.28	21.23	20-25%	San Diego	3687	9.06	78.52	12.42	14.37	29.83	0.76	0	48.3	6.73
6073008353	10.16	13.31	10-15%	San Diego	5133	9.18	71.58	19.25	16.5	29.28	5.59	0.47	43.14	5.03
6073008354	13.69	22.23	20-25%	San Diego	10247	15.93	75.96	8.11	8.56	30.87	4.91	0	48.93	6.73
6073008355	13.55	21.84	20-25%	San Diego	3461	13.46	74.05	12.48	11.04	23.75	6.93	0	51.69	6.59
6073008356	12.78	19.88	15-20%	San Diego	4028	13.41	77.09	9.51	17.01	35.85	7.72	0	38.46	0.97
6073008357	18.32	33.55	30-35%	San Diego	4939	12.21	76.09	11.7	15.04	22.49	3.42	0.26	54.74	4.03
6073008358	20.86	39.73	35-40%	San Diego	7467	6.95	77.88	15.17	19.45	26.53	4.69	0	45	4.34
6073008359	28.65	56.23	55-60%	San Diego	4540	13.41	79.27	7.31	32.2	26.19	3.72	0.18	30.35	7.36
6073008360	22.98	44.45	40-45%	San Diego	6801	12.63	78.55	8.82	21.48	20.07	3.4	0.04	47.38	7.63
6073008361	14.42	24.05	20-25%	San Diego	2634	5.77	83.14	11.09	12.57	46.28	2.81	0	33.52	4.82
6073008362	15.14	25.84	25-30%	San Diego	3414	13.24	73.78	12.98	6.09	72.14	2.52	0	15.96	3.28
6073008363	11.29	16.16	15-20%	San Diego	4997	5.32	91.9	2.78	15.13	30.94	0	0	51.37	2.56
6073008364	10.06	13.09	10-15%	San Diego	6031	4.99	89.49	5.52	12.77	41.24	1.09	0.41	42	2.49
6073008365	8.26	9.06	5-10%	San Diego	3007	11.27	75.66	13.07	4.89	50.22	0.7	0.3	37.15	6.75
6073008366	8.24	9.01	5-10%	San Diego	6753	10.42	83.21	6.37	6.71	49.43	0	0	36.3	7.57
6073008501	5.22	3.40	1-5% (lowest scores)	San Diego	5969	15.11	71.74	13.15	16.97	71.2	0	0	5.85	5.98
6073008502	15.13	25.83	25-30%	San Diego	7345	11.16	76.68	12.16	26.48	59.07	0.98	0.04	7.95	5.47
6073008503	22.60	43.49	40-45%	San Diego	6933	7.7	74.48	17.81	30.9	58.78	0	0	6.42	3.91
6073008504	15.98	27.76	25-30%	San Diego	6526	11.69	72.89	15.42	21.05	64.48	2.5	0	8.73	3.23
6073008505	27.72	54.35	50-55%	San Diego	6388	11.08	75.58	13.34	28.69	43.68	3.15	0	21.32	3.16
6073008506	23.69	45.88	45-50%	San Diego	4620	9.57	77.58	12.86	24	55.11	2.36	0	17.01	1.52
6073008507	25.15	49.08	45-50%	San Diego	7812	10.25	75.59	14.16	21.85	44.55	7.68	0	23.54	2.38
6073008509	21.57	41.23	40-45%	San Diego	7369	9.42	74.69	15.89	20.95	51.69	6.89	0	16.55	3.92
6073008510	25.58	50.04	50-55%	San Diego	7083	10.76	74.59	14.65	23.1	46.69	4.19	0	21.51	4.52
6073008511	27.18	53.42	50-55%	San Diego	4989	4.27	89.34	6.39	28.74	41.63	2.39	0	24.84	2.41
6073008512	9.39	11.38	10-15%	San Diego	4829	8.45	72.15	19.4	15.59	69.27	1.66	0	9.7	3.79
6073008513	9.70	12.22	10-15%	San Diego	2828	12.31	68.28	19.41	11.63	68.35	2.26	0	13.3	4.46
6073008600	31.68	61.76	60-65%	San Diego	7378	11.56	79.38	9.05	49.09	21.89	6.42	1.03	17.62	3.94
6073008701	17.18	30.71	30-35%	San Diego	3192	14.91	77.94	7.14	19.64	44.11	7.68	0	20.9	7.68
6073008702	29.23	57.30	55-60%	San Diego	5320	4.45	80.24	15.3	30.92	46.8	6.11	0.17	9.23	6.77
6073008800	32.34	63.06	60-65%	San Diego	7217	13.57	75.67	10.77	35.4	14.78	6.42	0	41.14	2.26
6073008901	25.46	49.77	45-50%	San Diego	5686	8.81	81.99	9.2	30.18	46.45	5.7	0.26	14.58	2.83
6073008902	20.19	37.96	35-40%	San Diego	2231	5.15	83.55	11.3	24.16	60.6	6.1	0	4.98	4.17
6073009000	21.79	41.77	40-45%	San Diego	4979	8.82	82.83	8.36	55.09	27.94	2.53	0.4	9.78	4.26
6073009101	15.82	27.38	25-30%	San Diego	6153	7.83	71.83	20.33	11.7	78.77	1.85	0	2.96	4.71
6073009102	18.22	33.31	30-35%	San Diego	3660	6.67	78.93	14.4	24.73	56.17	5.25	0.27	10.66	2.92
6073009103	12.34	18.86	15-20%	San Diego	4157	9.72	69.76	20.52	16.21	75.37	0.55	2.19	2.69	2.98
6073009104	10.39	13.80	10-15%	San Diego	3194	8.11	72.26	19.63	17.6	74.01	0.97	0	4.26	3.16
6073009106	20.24	38.07	35-40%	San Diego	5112	3.78	89.85	6.38	24.75	60.13	3.62	0.37	7.36	3.78

6073009107	14.86	25.18	**25-30%**	San Diego	5095	5.28	85.32	9.4	17.66	67.58	3.14	0.16	7.91	3.55
6073009201	34.78	67.21	**65-70%**	San Diego	5745	18.57	74.12	7.31	20.78	36.36	17.16	0.24	22.07	3.38
6073009202	13.39	21.42	**20-25%**	San Diego	7034	10.53	76.19	13.28	20.26	54.05	4.66	0.7	12.87	7.46
6073009301	20.58	39.02	**35-40%**	San Diego	4935	10.7	78.4	10.9	20.02	52.66	2.21	0	18.78	6.32
6073009304	25.19	49.18	**45-50%**	San Diego	9191	9.34	82.87	7.79	23.19	60	4.59	0.26	8.65	3.31
6073009305	12.28	18.67	**15-20%**	San Diego	4530	8.87	78.61	12.52	17.77	56.91	6.29	0	10.15	8.87
6073009306	25.27	49.39	**45-50%**	San Diego	6308	11.51	77.69	10.8	13.98	50.86	5.33	1.09	22.75	5.99
6073009400	26.43	51.75	**50-55%**	San Diego	4356	14.97	85.03	0	31.66	48.85	7.97	2.09	2.87	6.57
6073009502	10.32	13.74	**10-15%**	San Diego	4216	13.5	70.3	16.2	11.46	63.05	4.46	0.4	17.22	3.42
6073009504	8.73	10.05	**10-15%**	San Diego	6455	15.77	71.65	12.58	13.01	61.02	5.14	0	17.91	2.91
6073009505	5.71	4.11	**1-5% (lowest scores)**	San Diego	7124	10.22	72.22	17.56	10.82	57.76	2.85	0	24.77	3.79
6073009506	5.28	3.53	**1-5% (lowest scores)**	San Diego	4681	14.85	67.44	17.71	14.08	63.94	2.99	0	8.78	10.21
6073009507	6.88	6.54	**5-10%**	San Diego	3873	12.26	72.04	15.7	16.83	61.97	4.23	0	9.25	7.72
6073009509	17.71	32.09	**30-35%**	San Diego	4883	10.3	85.5	4.2	13.66	52.28	4.2	0	22.28	7.58
6073009510	20.92	39.86	**35-40%**	San Diego	5049	39.12	60.49	0.4	32.01	47.06	11.92	0	4.18	4.83
6073009511	15.22	26.07	**25-30%**	San Diego	4413	36.42	62.81	0.77	29.07	54.32	6.21	0.63	0.29	9.47
6073009602	11.61	16.83	**15-20%**	San Diego	4174	9.68	69.67	20.65	18.45	68.18	4.17	0.65	5.89	2.66
6073009603	15.59	26.88	**25-30%**	San Diego	5544	8.33	81.11	10.55	27.02	42.71	12.75	0	11.45	6.06
6073009604	19.89	37.27	**35-40%**	San Diego	3628	11.74	75.14	13.12	25.41	56.34	8.6	0.55	4.33	4.77
6073009703	5.63	4.00	**1-5% (lowest scores)**	San Diego	3494	14.88	65.68	19.43	25.36	65.97	0.63	0.14	4.7	3.21
6073009704	6.40	5.48	**5-10%**	San Diego	5868	10.12	67.6	22.27	15.56	66.75	4.06	0	10.14	3.49
6073009705	6.66	6.05	**5-10%**	San Diego	4232	12.05	70.49	17.46	16.9	67.06	5.01	0	6.88	4.16
6073009706	8.20	8.95	**5-10%**	San Diego	7880	15.23	61.84	22.93	15.56	73.16	3.52	0.57	4.49	2.7
6073009801	7.30	7.32	**5-10%**	San Diego	5194	9.61	67.14	23.26	14.17	72.99	2.56	0	5.49	4.79
6073009802	19.11	35.40	**35-40%**	San Diego	6715	12.38	73.79	13.83	24.36	60.55	6.48	0	6.94	1.67
6073009804	7.97	8.46	**5-10%**	San Diego	5286	12.47	65.49	22.04	15.53	74.25	1.23	0	5.77	3.22
6073009805	6.93	6.64	**5-10%**	San Diego	5025	11.02	68	20.98	14.17	73.09	2.09	0.3	6.15	4.2
6073009901	NA	NA	**NA**	San Diego	767	2.09	97.91	0	20.99	57.24	12.52	0	6.65	2.61
6073009902	NA	NA	**NA**	San Diego	0	NA	NA	NA	NA	NA	NA	NA	NA	NA
6073010001	27.41	53.76	**50-55%**	San Diego	4991	12.1	74.35	13.54	65.38	15.35	4.11	0.18	12.92	2.06
6073010003	29.24	57.34	**55-60%**	San Diego	6081	12.19	68.89	18.93	66.57	8.63	1.99	0	20.96	1.84
6073010004	25.25	49.36	**45-50%**	San Diego	5218	9.6	75.12	15.27	81.89	5.27	1.28	0	10.67	0.88
6073010005	33.92	65.67	**65-70%**	San Diego	7803	15.8	70.68	13.52	93.32	3.29	0.45	0	2.69	0.24
6073010009	39.83	74.74	**70-75%**	San Diego	6978	19.23	76.12	4.64	93.39	1.69	2.21	0	2.71	0
6073010010	28.00	54.95	**50-55%**	San Diego	5431	10.26	67.19	22.56	77.44	8.64	2.3	0	11.05	0.57
6073010011	17.13	30.65	**30-35%**	San Diego	4134	13.96	72.69	13.35	66.04	7.43	10.81	0	13.26	2.47
6073010012	33.81	65.56	**65-70%**	San Diego	5199	16.14	76.05	7.81	96.88	0.77	0.42	0.13	0.67	1.12
6073010013	45.66	82.78	**80-85%**	San Diego	5670	13.69	75.36	10.95	96.51	2.19	1.18	0	0.12	0
6073010014	29.31	57.45	**55-60%**	San Diego	18854	10.96	80.22	8.82	50.39	17.63	10.83	0.32	19.41	1.42
6073010015	29.20	57.27	**55-60%**	San Diego	3821	13.74	78.75	7.51	78.64	6.6	4.4	0	9.81	0.55
6073010103	33.69	65.29	**65-70%**	San Diego	6284	10.39	81.48	8.13	74.95	15.6	2.96	0.35	3.74	2.4
6073010104	31.16	60.97	**60-65%**	San Diego	3758	9.5	77.94	12.56	53.62	20.7	8.65	0	14.53	2.5
6073010106	30.12	58.94	**55-60%**	San Diego	5815	14.74	72.73	12.54	86.88	7.1	0.6	0	3.82	1.6
6073010107	25.73	50.44	**50-55%**	San Diego	7188	11.49	76.31	12.2	73.08	12.02	3.69	0	9.86	1.35
6073010109	32.35	63.10	**60-65%**	San Diego	5341	9.51	75.23	15.26	79.61	8.44	3.43	0	6.18	2.34
6073010110	34.61	66.92	**65-70%**	San Diego	7871	12.13	75.75	12.12	64.63	14.61	1.11	0	15.42	4.23
6073010111	40.93	76.53	**75-80%**	San Diego	3230	11.98	75.63	12.38	92.14	5.7	0.93	0	0.74	0.5
6073010112	31.47	61.43	**60-65%**	San Diego	5683	17.09	76.09	6.83	84.37	6.92	4.45	0	2.8	1.46
6073010200	29.82	58.32	**55-60%**	San Diego	7155	14.51	72.47	13.03	35.77	39.18	6.22	1.2	9.8	7.84
6073010300	34.00	65.81	**65-70%**	San Diego	4485	12.75	73.42	13.82	44.75	42.97	0.71	0	8.49	3.08
6073010401	24.04	46.84	**45-50%**	San Diego	2542	12.9	75.3	11.8	62.79	28.09	3.58	0.24	0.67	4.64
6073010402	32.10	62.56	**60-65%**	San Diego	6131	14.34	77.51	8.16	66.74	15.15	4.01	0.55	10.63	2.9
6073010501	27.86	54.64	**50-55%**	San Diego	1547	8.14	73.56	18.29	39.04	54.49	0	0	4.27	2.2
6073010502	34.07	65.97	**65-70%**	San Diego	5455	16.37	75.07	8.56	56.79	21.76	8.43	0.7	8.8	3.52
6073010601	6.95	6.68	**5-10%**	San Diego	2153	5.11	55.13	39.76	17.32	74.5	1.49	0.84	3.48	2.37
6073010800	7.91	8.32	**5-10%**	San Diego	2736	10.64	69.01	20.36	11.84	82.64	0	0.29	2.34	2.89
6073010900	5.93	4.55	**1-5% (lowest scores)**	San Diego	2224	6.97	65.78	27.25	8.72	83.72	3.73	0	1.71	2.11
6073011000	6.83	6.45	**5-10%**	San Diego	3567	6.73	68.1	25.18	15.92	78.89	0.14	0	3.81	1.23

6073011100	12.36	18.89	**15-20%**	San Diego	4807	9.82	69.92	20.26	10.9	80.59	0.25	0.67	3.33	4.26
6073011300	NA	NA	**NA**	San Diego	2467	1.95	98.05	0	27.93	48.8	16.98	0.49	4.58	1.22
6073011601	47.66	85.09	**85-90%**	San Diego	5470	16.4	76.76	6.84	84.99	2.47	1.86	0	8.44	2.23
6073011602	47.42	84.91	**80-85%**	San Diego	3900	13.31	77.74	8.95	77.92	9.56	7.64	0.21	4.44	0.23
6073011700	49.07	86.81	**85-90%**	San Diego	6078	7.95	68.43	23.63	56.91	12.04	3.47	0.61	25.86	1.1
6073011801	47.45	84.93	**80-85%**	San Diego	4169	10.67	77.74	11.59	75.51	8.16	2.61	0	12.52	1.2
6073011802	47.31	84.78	**80-85%**	San Diego	7401	13.05	77.15	9.8	72.52	7.49	1.68	0	17.73	0.59
6073011902	31.22	61.12	**60-65%**	San Diego	5673	7.77	66.7	25.52	60.13	14.74	3.49	0	20.69	0.95
6073012002	37.35	71.13	**70-75%**	San Diego	3548	7.36	70.24	22.41	40.78	5.13	4.54	0.42	47.27	1.86
6073012003	34.82	67.27	**65-70%**	San Diego	3336	13.61	73.23	13.16	62.26	7.22	1.26	0	27.01	2.25
6073012101	37.87	71.87	**70-75%**	San Diego	2104	15.4	68.25	16.35	69.44	10.6	0.86	0.38	15.59	3.14
6073012102	43.50	80.13	**80-85%**	San Diego	3385	14.27	69.84	15.89	76.57	9.25	1.54	0	11.55	1.09
6073012200	35.44	68.36	**65-70%**	San Diego	3657	9.71	77.47	12.82	76.67	10.45	2.41	0	7.76	2.71
6073012302	26.43	51.78	**50-55%**	San Diego	1708	19.09	59.6	21.31	69.2	22.54	2.52	0	5.44	0.29
6073012303	27.79	54.49	**50-55%**	San Diego	3242	5.8	68.38	25.82	56.57	30.57	3.3	0.65	6.66	2.25
6073012304	28.81	56.59	**55-60%**	San Diego	3696	13.28	75.54	11.17	62.42	27.57	2.92	0.32	4.57	2.19
6073012401	38.59	73.03	**70-75%**	San Diego	3539	10.77	77.39	11.84	68.41	17.63	3.25	0	6.22	4.49
6073012402	43.98	80.77	**80-85%**	San Diego	5107	12.24	75.17	12.59	75.64	15.72	3.58	0.61	3.13	1.31
6073012501	52.53	90.54	**90-95%**	San Diego	3283	16.2	68.87	14.93	81.21	12.46	1.01	0.27	5.06	0
6073012502	51.30	89.23	**85-90%**	San Diego	4330	20.14	73.65	6.21	76.4	12.61	3.16	0	6.61	1.22
6073012600	43.62	80.28	**80-85%**	San Diego	4798	10.4	78.22	11.38	77.78	11.73	3.31	0	6.34	0.83
6073012700	40.11	75.13	**75-80%**	San Diego	4868	9.12	79.25	11.63	76.83	12.84	4.6	0	4.19	1.54
6073012800	26.42	51.74	**50-55%**	San Diego	4406	9.92	74.19	15.89	71.49	21.81	0.75	0	4.33	1.61
6073012900	17.65	31.95	**30-35%**	San Diego	3471	9.77	75.28	14.95	59.87	26.48	3.31	0	6.05	4.29
6073013000	27.22	53.49	**50-55%**	San Diego	6061	15.9	70.35	13.74	68.85	20.36	4.29	0	4.97	1.53
6073013102	26.54	52.08	**50-55%**	San Diego	6385	12.2	75.85	11.95	76.59	10.81	3.56	0	8.85	0.2
6073013103	40.96	76.61	**75-80%**	San Diego	2506	9.58	77.57	12.85	73.54	14.25	4.87	0	5.63	1.72
6073013104	32.09	62.54	**60-65%**	San Diego	6473	14.43	76.77	8.81	83.15	8.48	3.97	0	0.45	3.95
6073013203	31.88	62.18	**60-65%**	San Diego	5992	9.86	72.45	17.69	84.48	5.32	0.5	0	9.7	0
6073013204	39.48	74.13	**70-75%**	San Diego	3970	11.84	74.61	13.55	84.74	9.75	0.38	0	5.14	0
6073013205	47.05	84.56	**80-85%**	San Diego	2431	16.41	75.65	7.94	91.77	3.33	1.44	0	2.38	1.07
6073013206	33.42	64.83	**60-65%**	San Diego	7185	12.93	67.32	19.75	81.64	9.73	2.32	0.01	6.29	0
6073013301	26.16	51.25	**50-55%**	San Diego	5205	12.93	74.58	12.49	61.77	23.61	2.71	0	9.8	2.11
6073013302	26.76	52.51	**50-55%**	San Diego	4773	9.32	73.04	17.64	75.13	19.78	1.72	0.23	2.68	0.46
6073013303	30.19	59.08	**55-60%**	San Diego	5111	11.92	71.45	16.63	71.79	16.98	3.35	0.1	5.93	1.86
6073013306	34.97	67.54	**65-70%**	San Diego	4517	13.99	77.35	8.66	71.62	9.65	6.13	0	10.8	1.79
6073013307	42.77	79.12	**75-80%**	San Diego	4780	13.66	71.74	14.6	79.94	10.44	0.73	0	7.85	1.05
6073013308	38.76	73.16	**70-75%**	San Diego	3669	16.14	75.72	8.15	78.03	8.48	5.07	0	7.88	0.55
6073013309	28.60	56.08	**55-60%**	San Diego	6733	10.66	75.81	13.53	64.37	23.48	0.49	0	10.26	1.4
6073013310	21.39	40.86	**40-45%**	San Diego	31118	15.83	75.23	8.94	47.89	13.47	3.12	0.01	32.69	2.84
6073013311	11.82	17.37	**15-20%**	San Diego	11136	12.5	78.38	9.12	51.28	15.08	4.93	0	25.83	2.89
6073013312	33.88	65.63	**65-70%**	San Diego	2549	11.18	76.62	12.2	73.64	12.91	6.59	0.43	4.39	2.04
6073013313	17.52	31.62	**30-35%**	San Diego	19689	17.59	75.24	7.17	40.2	15.03	7.44	0	33.28	4.06
6073013314	14.97	25.48	**25-30%**	San Diego	22349	18.3	75.2	6.5	48.19	13.35	5.25	0.1	22.05	11.07
6073013401	30.28	59.27	**55-60%**	San Diego	4374	14.33	67.63	18.04	60.91	32.81	0	0	5.92	0.37
6073013409	33.31	64.61	**60-65%**	San Diego	5421	11.4	69.8	18.8	54.82	30.25	4.45	0	8.63	1.84
6073013410	8.78	10.15	**10-15%**	San Diego	7827	14.83	73	12.16	45.74	24.66	5.43	0	18.42	5.75
6073013411	9.29	11.16	**10-15%**	San Diego	5160	10.83	66.01	23.16	44.73	32.64	3.08	0	14.94	4.61
6073013412	15.30	26.20	**25-30%**	San Diego	4691	9.76	70.88	19.36	49.69	33.53	3.97	0	11.19	1.62
6073013414	14.68	24.74	**20-25%**	San Diego	7428	8.68	74.76	16.56	42.29	26.25	5.24	0	22.33	3.89
6073013415	11.28	16.14	**15-20%**	San Diego	1302	6.22	75.58	18.2	55.45	26.65	2	0	12.44	3.46
6073013416	7.96	8.41	**5-10%**	San Diego	4261	10.73	73.6	15.68	46.82	28.28	9.67	0	12.46	2.77
6073013417	7.87	8.28	**5-10%**	San Diego	2071	8.5	70.64	20.86	48.09	20.91	8.64	0.29	19.31	2.75
6073013418	9.67	12.18	**10-15%**	San Diego	6698	11.68	73.47	14.86	63.38	16.09	2.75	0	14.34	3.43
6073013419	8.09	8.74	**5-10%**	San Diego	8876	15.47	75.02	9.51	54.41	17.8	6.28	0	15.48	6.04
6073013420	14.45	24.17	**20-25%**	San Diego	3468	11.76	77.08	11.16	32.3	23.85	8.07	0	30.63	5.16
6073013421	14.34	23.93	**20-25%**	San Diego	4488	13.79	72.39	13.81	41.71	22.13	6.02	0	25.04	5.1
6073013503	19.42	35.97	**35-40%**	San Diego	6265	12.87	71.32	15.82	42.03	34.08	14.19	0.81	5.32	3.58

6073013504	12.91	20.27	**20-25%**	San Diego	3789	7.28	78.28	14.44	28.11	38.85	11.01	0.18	13.04	8.81
6073013505	16.06	28.00	**25-30%**	San Diego	5676	14.71	70.47	14.82	25.39	44.84	17.02	0.6	4.23	7.93
6073013506	18.15	33.04	**30-35%**	San Diego	4103	16.52	73.09	10.38	50.48	33.71	5.34	0.05	8.26	2.17
6073013601	14.42	24.07	**20-25%**	San Diego	5799	14	70.15	15.85	34.71	46.28	9.59	0	4.52	4.9
6073013604	9.87	12.57	**10-15%**	San Diego	6636	10.53	74.62	14.84	20.16	66.71	4.96	0	3.03	5.14
6073013605	9.92	12.75	**10-15%**	San Diego	6227	8.21	71.64	20.15	18.87	74.45	0.58	0	3.2	2.91
6073013606	11.96	17.83	**15-20%**	San Diego	6480	9.6	69.63	20.77	19.31	62.84	4.74	0	4.72	8.4
6073013701	8.39	9.40	**5-10%**	San Diego	2433	4.32	70.86	24.83	18.17	69.09	5.96	0	4.52	2.26
6073013702	27.70	54.32	**50-55%**	San Diego	5528	15.23	73.06	11.7	39.16	36.16	12.74	0	6.5	5.45
6073013801	16.96	30.40	**30-35%**	San Diego	4946	15.39	70.72	13.89	30.93	39.1	17.69	0.95	8.35	2.97
6073013802	28.66	56.24	**55-60%**	San Diego	3523	20.83	73.6	5.56	55.58	21.29	16.69	0.23	2.3	3.92
6073013903	28.87	56.72	**55-60%**	San Diego	4299	11.3	67.67	21.03	41.57	29.96	9.56	0	15.49	3.42
6073013905	10.65	14.54	**10-15%**	San Diego	3897	9.34	79.27	11.39	29.28	36.85	13.93	0	12.42	7.52
6073013906	23.70	45.93	**45-50%**	San Diego	5291	15.78	70.5	13.72	35.14	32.19	13.68	1.17	12.23	5.59
6073013907	23.23	44.98	**40-45%**	San Diego	4670	18.91	72.36	8.74	70.94	13.4	9.49	0	6	0.17
6073013908	27.90	54.77	**50-55%**	San Diego	4120	13.83	78.59	7.57	60	16	7.89	0.1	11.92	4.1
6073013909	14.55	24.47	**20-25%**	San Diego	5068	12.31	74.37	13.32	53.79	26.93	5.51	0	10.54	3.24
6073014001	30.47	59.58	**55-60%**	San Diego	4500	7.13	79	13.87	39.78	33.58	11.18	0	10.2	5.27
6073014002	19.39	35.92	**35-40%**	San Diego	5051	12.83	73.97	13.21	47	27.58	12.49	0	9.03	3.9
6073014101	26.58	52.17	**50-55%**	San Diego	3370	15.25	70.27	14.48	46.11	38.69	4.45	0	6.05	4.69
6073014102	20.35	38.39	**35-40%**	San Diego	4198	8.62	73.01	18.37	42.73	9.86	28.78	0	13.53	5.1
6073014200	31.03	60.67	**60-65%**	San Diego	6513	11.21	76.55	12.24	43.9	26.32	14.97	0.09	11.36	3.36
6073014300	40.70	76.12	**75-80%**	San Diego	4131	10.24	79.81	9.95	57.95	28.2	7.21	0.19	5.2	1.23
6073014400	49.87	87.71	**85-90%**	San Diego	4412	17.68	66.32	16	49.46	12.22	27.04	0	2.1	9.18
6073014500	34.43	66.58	**65-70%**	San Diego	3880	19.97	68.99	11.03	39.43	35.93	14.18	0	6.52	3.94
6073014601	20.88	39.78	**35-40%**	San Diego	4854	11	71.2	17.8	25.34	56.63	7.38	0	7.13	3.52
6073014602	18.26	33.40	**30-35%**	San Diego	5445	15	70.65	14.34	21.87	43.12	17.1	0	13.83	4.08
6073014700	14.41	24.04	**20-25%**	San Diego	8008	10.89	76.74	12.38	24.25	59.27	4.6	0.12	6.33	5.43
6073014803	23.25	45.01	**45-50%**	San Diego	4818	8.18	74.76	17.06	20.36	60.65	4.21	0	13.11	1.66
6073014804	11.71	17.10	**15-20%**	San Diego	4112	14.47	62.45	23.08	25.49	63.35	5.4	0	4.45	1.31
6073014805	18.35	33.59	**30-35%**	San Diego	4358	12.35	74.69	12.96	14.64	61.36	6.24	0	10.56	7.21
6073014806	31.90	62.24	**60-65%**	San Diego	2778	12.56	77.43	10.01	39.81	41.22	5.94	0	6.48	6.55
6073014901	23.69	45.89	**45-50%**	San Diego	4086	10.21	74.89	14.9	20.95	62.48	7.05	0.39	1.32	7.81
6073014902	23.46	45.50	**45-50%**	San Diego	3176	9.54	79.35	11.11	24.15	61.52	2.33	0	2.93	9.07
6073015000	25.52	49.91	**45-50%**	San Diego	7367	15.22	73.2	11.58	23.8	51.85	9.56	0.24	10.82	3.73
6073015100	12.85	20.07	**20-25%**	San Diego	4916	12.59	73.47	13.93	19.57	65.74	7.22	0.28	5.22	1.95
6073015200	17.45	31.39	**30-35%**	San Diego	3773	7.66	67.37	24.97	22.21	68.91	5.62	0	0.77	2.49
6073015301	30.92	60.48	**60-65%**	San Diego	3560	16.6	77.33	6.07	18.09	65.22	0.98	0	2.07	13.62
6073015302	13.33	21.31	**20-25%**	San Diego	4477	12.82	63.64	23.54	14.25	74	2.23	0	7.13	2.39
6073015403	15.71	27.13	**25-30%**	San Diego	2619	11.26	66.36	22.37	5.69	85.26	0.61	0.34	4.09	4.01
6073015404	21.58	41.26	**40-45%**	San Diego	7831	14.2	70.86	14.94	19.26	69.94	4.12	0	2.96	3.72
6073015405	6.29	5.32	**5-10%**	San Diego	5569	8.33	73.71	17.96	20.47	75.2	0.2	0	1.98	2.15
6073015406	6.01	4.64	**1-5% (lowest scores)**	San Diego	2468	8.51	68.76	22.73	17.63	78.89	0.16	0.65	0.41	2.27
6073015501	12.03	18.07	**15-20%**	San Diego	5180	9.9	74.07	16.02	23.71	72.03	0.39	1.7	0.29	1.89
6073015502	5.27	3.52	**1-5% (lowest scores)**	San Diego	2889	14.26	67.53	18.21	7.96	84.67	0	3.67	1.39	2.32
6073015601	18.04	32.79	**30-35%**	San Diego	6043	13.77	74.22	12.01	27.6	61.49	1.32	0	1.64	7.94
6073015602	12.40	19.00	**15-20%**	San Diego	2432	9.87	69.98	20.15	20.19	73.56	0.95	0.16	1.44	3.7
6073015701	28.03	55.06	**55-60%**	San Diego	5966	17.75	72.16	10.09	41.2	39.61	8.3	0	5.15	5.75
6073015703	32.10	62.58	**60-65%**	San Diego	7146	17.67	71.3	11.03	23.08	60.97	7.18	0.14	2.17	6.47
6073015704	25.07	48.87	**45-50%**	San Diego	3936	18.14	69.77	12.09	34.98	50.15	11.13	0	1.19	2.54
6073015801	35.24	67.94	**65-70%**	San Diego	3544	16.93	73.5	9.57	33.66	48.34	11.51	0	3.41	3.08
6073015802	36.34	69.63	**65-70%**	San Diego	4877	12.69	70.41	16.9	35.06	49.58	7.5	0.18	3.31	4.37
6073015901	46.67	84.03	**80-85%**	San Diego	4037	17.79	79.29	2.92	45.03	41.44	5.5	0	4.41	3.62
6073015902	42.53	78.69	**75-80%**	San Diego	5178	19.18	72.21	8.61	27.91	60.31	6.12	0.25	2.92	2.49
6073016000	34.79	67.23	**65-70%**	San Diego	2265	10.99	75.85	13.16	30.82	56.73	3.8	0.22	4.77	3.66
6073016100	24.25	47.29	**45-50%**	San Diego	6322	12.67	70.04	17.29	22.92	66.18	1.79	0.19	5.03	3.89
6073016201	24.21	47.20	**45-50%**	San Diego	5382	10.24	69.29	20.48	17.5	73.13	2.38	0	4	2.99
6073016202	48.46	86.09	**85-90%**	San Diego	3868	16.65	78.46	4.89	19.52	55.46	13.42	0.21	7.57	3.83

6073016301	36.52	69.91	65-70%	San Diego	5338	19.2	74.67	6.13	25.59	50.21	13.62	0.49	3.26	6.84
6073016302	34.71	67.10	65-70%	San Diego	5865	15.72	75	9.28	32.02	51.65	3.53	0.12	6.34	6.34
6073016401	22.45	43.17	40-45%	San Diego	5340	11.09	71.35	17.57	27.45	62.23	1.67	0.28	3.15	5.22
6073016402	28.73	56.38	55-60%	San Diego	8404	10.74	74.51	14.74	31.45	61.78	2.97	0.1	1.74	1.96
6073016502	33.02	64.09	60-65%	San Diego	7635	10.43	79.04	10.53	24.56	63.16	4.74	0	5.02	2.53
6073016503	21.86	41.92	40-45%	San Diego	3481	21.09	68.63	10.28	28.07	53.81	7.01	0.43	7.64	3.05
6073016504	43.22	79.83	75-80%	San Diego	6856	11.6	80.64	7.76	31.27	45.77	8.77	1.76	6.45	5.98
6073016605	9.90	12.68	10-15%	San Diego	7830	13.83	65.81	20.36	15.86	73.42	1.61	0.68	5.68	2.75
6073016606	10.71	14.70	10-15%	San Diego	3575	14.24	73.06	12.7	21.29	69.06	0.64	0.34	3.33	5.34
6073016607	13.40	21.47	20-25%	San Diego	7432	15.31	70.8	13.89	19.5	69.87	2.38	0	5.14	3.11
6073016608	13.20	20.88	20-25%	San Diego	2737	12.5	73.33	14.18	12.39	73.11	8.07	0.22	0.84	5.37
6073016609	5.66	4.05	1-5% (lowest scores)	San Diego	5467	14.96	75.31	9.73	18.36	71.76	0.07	0.49	5.6	3.71
6073016610	10.01	12.95	10-15%	San Diego	4082	12.76	78.74	8.5	16.68	70.97	1.32	0	3.45	7.57
6073016612	6.68	6.08	5-10%	San Diego	5936	14.3	70.57	15.13	15.7	71.9	1.43	1.36	4.9	4.7
6073016613	9.37	11.32	10-15%	San Diego	1881	7.87	78.95	13.18	15.26	72.99	1.28	0	8.19	2.29
6073016614	11.46	16.52	15-20%	San Diego	3987	16.2	75.92	7.88	17.88	70.73	0.58	0	3.89	6.92
6073016615	11.98	17.90	15-20%	San Diego	4488	10.25	80.86	8.89	21.84	63.17	3.61	0.53	6.28	4.57
6073016616	18.06	32.85	30-35%	San Diego	4441	14.46	72.75	12.79	20.36	68.86	2.32	0	3.56	4.91
6073016617	28.73	56.37	55-60%	San Diego	3453	11.32	66.38	22.3	19.66	67.83	2.87	0.93	2.55	6.17
6073016701	17.41	31.30	30-35%	San Diego	9508	9.62	76.34	14.04	12.83	68.13	3.4	1.49	10.48	3.67
6073016702	26.63	52.27	50-55%	San Diego	8517	12.81	67.48	19.71	21.36	69.36	2.29	1.02	1.97	4
6073016802	13.75	22.34	20-25%	San Diego	7213	7.39	66.66	25.95	9	85.12	0.33	0	1.27	4.28
6073016804	28.30	55.47	55-60%	San Diego	7501	13.12	79.7	7.19	19.24	70.95	1.07	4.16	2.61	1.97
6073016806	11.00	15.46	15-20%	San Diego	4856	10.5	74.88	14.62	31.78	59.76	0.66	0	5.62	2.18
6073016807	14.79	25.01	25-30%	San Diego	7615	10.91	74.69	14.39	18.8	69.73	0.2	0.75	3.3	7.22
6073016809	15.82	27.40	25-30%	San Diego	5625	14.54	71.24	14.22	20.2	71.32	1.6	0	3.38	3.5
6073016810	13.23	20.98	20-25%	San Diego	3022	11.18	73.79	15.02	12.71	80.48	0	0	2.85	3.97
6073016811	10.67	14.57	10-15%	San Diego	4818	9.88	72.52	17.6	19.36	66.36	5.23	0	7.3	1.74
6073016901	20.15	37.85	35-40%	San Diego	7427	16.74	67.16	16.1	13.5	72.55	5.09	0.58	3.41	4.87
6073016902	16.66	29.54	25-30%	San Diego	2841	12.11	73.92	13.97	16.23	63.71	1.51	13.83	1.2	3.52
6073017006	5.47	3.81	1-5% (lowest scores)	San Diego	2957	13.63	62.94	23.44	4.13	79.37	2.98	0	9.37	4.16
6073017009	13.40	21.48	20-25%	San Diego	4857	15.87	69.9	14.23	28.62	56.31	1.46	0	10.09	3.52
6073017010	5.44	3.73	1-5% (lowest scores)	San Diego	3275	13.71	72.82	13.47	12.49	65.13	1.53	0.37	13.22	7.27
6073017014	6.53	5.81	5-10%	San Diego	2553	0	25.93	74.07	8.42	83.82	1.21	0	5.8	0.74
6073017015	12.01	17.97	15-20%	San Diego	7756	12.21	70.29	17.5	16.5	58.91	2.53	0	16.4	5.66
6073017018	15.37	26.40	25-30%	San Diego	4087	9.98	76.02	14	16.71	35.82	3.82	0	34.16	9.49
6073017019	9.00	10.63	10-15%	San Diego	6673	4.14	49.71	46.16	10.13	78.53	2.14	0	7.3	1.9
6073017020	5.71	4.10	1-5% (lowest scores)	San Diego	3675	8.03	70.29	21.69	9.22	77.8	0	0	8.49	4.49
6073017021	3.07	0.71	1-5% (lowest scores)	San Diego	3368	7.69	70.22	22.09	8.02	81.5	0.77	0	3.8	5.91
6073017022	7.62	7.93	5-10%	San Diego	5469	12.49	68.51	19	8.74	68.57	2.51	0	15.41	4.77
6073017029	7.55	7.79	5-10%	San Diego	8548	7.44	75.12	17.44	8.21	71.84	0	0.74	15.36	3.85
6073017030	14.48	24.29	20-25%	San Diego	25348	21.41	67.48	11.11	6.24	50.45	1.97	0.48	36.13	4.73
6073017031	8.58	9.80	5-10%	San Diego	4170	16.91	74.24	8.85	19.45	55.28	0.02	0	20.31	4.94
6073017032	10.41	13.86	10-15%	San Diego	15361	14.48	76.41	9.1	8.76	42.2	1.35	0	38.77	8.93
6073017033	4.44	2.14	1-5% (lowest scores)	San Diego	4936	12.09	74.9	13.01	10.39	53.97	1.32	0	31.38	2.94
6073017034	8.01	8.55	5-10%	San Diego	5054	16.62	72.85	10.53	17	53.76	2.33	0.42	21.45	5.05
6073017035	13.84	22.55	20-25%	San Diego	3505	10.9	74.55	14.55	10.7	44.91	7.42	0	28.13	8.84
6073017036	7.10	6.95	5-10%	San Diego	3606	16.47	71.16	12.37	11.67	50.78	4.91	0	22.74	9.9
6073017037	13.85	22.66	20-25%	San Diego	5575	13.09	73.38	13.52	21.47	48.3	2.04	0	26.41	1.78
6073017039	10.49	14.07	10-15%	San Diego	7364	13.65	72.35	14	9.74	54.29	1.28	0.2	30.93	3.56
6073017040	10.74	14.79	10-15%	San Diego	4488	10.87	71.26	17.87	14.75	57.42	2.27	0	19.12	6.44
6073017041	15.37	26.37	25-30%	San Diego	5923	13.62	72.8	13.57	13.84	67.92	3.73	0	10.96	3.55
6073017042	10.30	13.72	10-15%	San Diego	8163	15.12	77.96	6.92	9.09	48.33	1.94	0	34.69	5.95
6073017043	14.74	24.87	20-25%	San Diego	6780	14.94	79.38	5.68	18.47	38.63	1.98	0.28	35.26	5.38
6073017044	4.21	1.92	1-5% (lowest scores)	San Diego	5826	16.34	75.42	8.24	8.24	50.57	2.85	0	33.5	4.84
6073017045	8.24	9.04	5-10%	San Diego	2686	10.72	74.24	15.04	8.12	49.07	1.04	0	35.15	6.63
6073017046	8.34	9.19	5-10%	San Diego	4037	11.22	69.14	19.64	7.73	60.19	0.99	0.15	25.27	5.67
6073017047	4.14	1.74	1-5% (lowest scores)	San Diego	3971	13.67	70.11	16.22	13.83	66.18	0.65	0	14.08	5.26

6073017048	20.74	39.37	35-40%	San Diego	6758	14.1	75.97	9.93	33.46	47.01	0.27	0.22	15.11	3.94
6073017049	21.19	40.39	40-45%	San Diego	3364	15.67	73.63	10.7	24.82	59.01	1.49	0	10.82	3.86
6073017050	12.99	20.50	20-25%	San Diego	3104	12.44	66.78	20.78	16.53	58.6	1.51	0	19.72	3.64
6073017051	5.27	3.49	1-5% (lowest scores)	San Diego	5188	12.45	65.03	22.51	11.08	56.17	6.67	0	17.45	8.64
6073017052	6.02	4.72	1-5% (lowest scores)	San Diego	5277	13.53	72.41	14.06	12.45	49.82	0	0.4	29.43	7.9
6073017053	8.68	9.90	5-10%	San Diego	3305	8.05	71.62	20.33	8.96	77.22	0.09	0	5.99	7.75
6073017054	4.07	1.65	1-5% (lowest scores)	San Diego	5731	11.57	64.23	24.2	14.12	73.44	1.43	0.16	6.46	4.4
6073017055	3.56	1.08	1-5% (lowest scores)	San Diego	5453	12.21	75.94	11.85	5.28	48.27	1.3	0	42.49	2.66
6073017056	5.82	4.35	1-5% (lowest scores)	San Diego	4486	12.44	77.66	9.9	18.72	47.68	2.59	0.09	28.71	2.21
6073017104	6.00	4.63	1-5% (lowest scores)	San Diego	3906	13.8	67.43	18.77	12.93	79.47	0	0	2.79	4.81
6073017106	6.40	5.53	5-10%	San Diego	4538	6.41	63.79	29.79	10.67	84.6	0	0	2.75	1.98
6073017107	4.46	2.22	1-5% (lowest scores)	San Diego	2874	13.47	69.87	16.67	8.07	78.43	0.1	0	9.95	3.44
6073017108	8.25	9.05	5-10%	San Diego	4859	13.48	69.54	16.98	10.66	79.05	1.03	0	4.8	4.47
6073017109	8.29	9.15	5-10%	San Diego	7115	13.44	75.69	10.88	5.73	82.21	0.15	0	9.17	2.73
6073017110	9.51	11.74	10-15%	San Diego	11906	13.04	73.56	13.41	17.85	66.66	1.8	1.85	7.99	3.86
6073017200	5.05	3.11	1-5% (lowest scores)	San Diego	4301	4.49	68.01	27.51	10.81	82.54	1.23	0	1.67	3.74
6073017303	4.45	2.19	1-5% (lowest scores)	San Diego	2932	10.91	68.52	20.57	10.85	80.25	1.57	0	4.26	3.07
6073017304	10.71	14.69	10-15%	San Diego	5982	11.52	70.49	17.99	24.26	68.39	0.37	0.27	4.26	2.46
6073017305	3.99	1.53	1-5% (lowest scores)	San Diego	3250	8.28	61.97	29.75	4.46	86.43	0.86	0	5.69	2.55
6073017306	2.89	0.61	1-5% (lowest scores)	San Diego	2439	5.86	64.17	29.97	7.71	83.39	0	0	6.68	2.21
6073017401	10.10	13.16	10-15%	San Diego	5686	6.21	72.83	20.96	10.27	84.58	0	0	2.22	2.94
6073017403	6.18	5.03	5-10%	San Diego	5345	9.07	67.69	23.24	11.3	81.65	0	0.47	3.76	2.83
6073017404	12.00	17.95	15-20%	San Diego	7099	11.34	64.84	23.82	13.75	80.03	1.27	0	3.21	1.75
6073017501	10.03	13.04	10-15%	San Diego	2898	5.35	75.05	19.6	15.32	76.85	0.31	0.31	3	4.21
6073017502	15.99	27.79	25-30%	San Diego	3713	11.07	76.46	12.47	27.31	63.53	1.83	0.32	3.99	3.02
6073017601	4.02	1.55	1-5% (lowest scores)	San Diego	5584	7.38	54.46	38.16	4.73	85.3	0.2	0.79	6	2.99
6073017603	15.25	26.13	25-30%	San Diego	2573	11.27	72.68	16.05	31.13	65.45	0.31	0.51	2.18	0.43
6073017604	13.02	20.56	20-25%	San Diego	7441	12.96	62.89	24.15	17.32	73.12	2.18	0	5.13	2.24
6073017701	13.46	21.58	20-25%	San Diego	5141	12.41	76.97	10.62	13.89	76.79	0.64	0.31	3.58	4.79
6073017702	7.57	7.83	5-10%	San Diego	3627	11.47	75.3	13.23	14.23	82.3	0	0	2.54	0.94
6073017801	11.05	15.58	15-20%	San Diego	6842	7.5	77.29	15.21	18.21	66.12	0	0.29	8.18	7.19
6073017808	5.31	3.57	1-5% (lowest scores)	San Diego	6482	9.64	65	25.36	7.68	78.25	0	0	12.15	1.91
6073017809	7.08	6.88	5-10%	San Diego	2214	10.34	71.05	18.61	12.06	80.08	0.09	1.04	2.98	3.75
6073017810	5.46	3.77	1-5% (lowest scores)	San Diego	4578	9.44	67.34	23.22	6.73	85.36	1.4	0	4.15	2.36
6073017811	4.23	1.97	1-5% (lowest scores)	San Diego	6665	15.33	70.59	14.07	11.84	74.01	0.33	0	10.11	3.71
6073017813	9.62	12.01	10-15%	San Diego	4018	9.21	65.48	25.31	7.32	83.95	0	0	6.07	2.66
6073017900	16.73	29.73	25-30%	San Diego	7099	8.37	77.69	13.95	35.98	57.08	0.83	0	2.32	3.79
6073018000	9.84	12.51	10-15%	San Diego	3258	9.82	67.86	22.31	10.16	86.59	0.49	0.31	1.75	0.71
6073018100	17.56	31.72	30-35%	San Diego	6114	9.52	76.76	13.72	26.05	65.69	0.31	2.88	2.74	2.34
6073018200	37.31	71.09	70-75%	San Diego	6754	15.38	75.66	8.96	53.38	35.59	2.49	1.29	0.95	6.31
6073018300	13.06	20.70	20-25%	San Diego	2119	4.67	72.72	22.61	14.77	76.26	2.88	0	3.26	2.83
6073018400	26.05	51.03	50-55%	San Diego	3399	11.15	69.14	19.71	41.34	47.25	2.44	0	4.18	4.8
6073018504	18.19	33.21	30-35%	San Diego	6595	12.39	72.46	15.15	19	71.01	1.23	0	4.05	4.72
6073018507	16.90	30.22	30-35%	San Diego	10139	13.17	75.85	10.99	43.69	36.74	6.77	0	9.38	3.42
6073018509	32.63	63.49	60-65%	San Diego	5454	14.48	76.44	9.08	65.31	18.3	8.29	0	5.13	2.97
6073018510	14.90	25.30	25-30%	San Diego	2816	11.86	74.93	13.21	45.63	43.15	4.47	0.21	4.62	1.92
6073018511	19.88	37.23	35-40%	San Diego	5502	13.99	75.68	10.32	41.53	39.08	3.83	0	8.22	7.34
6073018512	12.28	18.68	15-20%	San Diego	3960	6.64	46.82	46.54	24.77	63.51	6.79	0	2.8	2.12
6073018513	12.47	19.15	15-20%	San Diego	9921	13.76	73.05	13.19	28.7	49.17	4.96	1	10.2	5.98
6073018514	13.85	22.64	20-25%	San Diego	8953	7.1	76.72	16.17	26.33	50.08	11.64	0	9.37	2.58
6073018515	17.30	31.06	30-35%	San Diego	4767	9.25	69.71	21.04	16.45	68.18	3.69	0.61	6.52	4.55
6073018516	19.72	36.76	35-40%	San Diego	3899	13.31	73.12	13.57	38.04	42.16	1.95	0	12.36	5.49
6073018517	24.08	46.91	45-50%	San Diego	4704	8.33	74.21	17.45	28.42	58.57	1.4	3.78	6.31	1.51
6073018518	22.40	43.02	40-45%	San Diego	3764	13.26	77.39	9.35	67.14	24.63	1.51	0	3.93	2.79
6073018519	21.50	41.12	40-45%	San Diego	5546	13.47	75.35	11.18	63.85	22.16	4.89	1.15	3.12	4.83
6073018601	23.35	45.30	45-50%	San Diego	5491	12.37	76.82	10.82	27.75	51.58	3.9	0.16	10.33	6.28
6073018603	37.65	71.57	70-75%	San Diego	6747	19.24	70.59	10.17	64.84	18.25	6.3	0	8.71	1.9
6073018608	10.20	13.41	10-15%	San Diego	2812	14.37	66.68	18.95	21.27	50.11	5.01	0	17.28	6.33

6073018609	12.67	19.58	15-20%	San Diego	6437	11.11	79.54	9.35	57.09	27.34	3.43	0	8.33	3.81
6073018610	18.16	33.07	30-35%	San Diego	7801	14.04	74.66	11.31	58.35	22.95	7	0.1	10.06	1.54
6073018611	16.65	29.49	25-30%	San Diego	10106	16.1	71.22	12.69	28.85	48.04	3.99	0.17	15.57	3.38
6073018612	16.84	30.06	30-35%	San Diego	4092	13.71	73.02	13.27	34.8	57.16	3.03	0.51	3.45	1.05
6073018613	16.48	29.05	25-30%	San Diego	4073	14.09	76.01	9.89	30.71	42.7	7.44	0	13.11	6.04
6073018614	17.26	30.98	30-35%	San Diego	5700	10.51	64.61	24.88	35.16	39.91	6.65	0.4	7.44	10.44
6073018700	24.94	48.60	45-50%	San Diego	38754	19.43	80.35	0.23	28.57	57.66	8.67	1.19	2.28	1.63
6073018801	13.90	22.76	20-25%	San Diego	3911	6.93	65.07	28	21.53	74.28	1	0.08	0.87	2.25
6073018802	6.48	5.67	5-10%	San Diego	8320	7.14	60.95	31.91	14.39	78.11	1.06	0.43	3.35	2.66
6073018803	13.60	21.97	20-25%	San Diego	4841	9.56	67.4	23.03	26.59	65.11	1.07	0.5	4.4	2.33
6073018903	24.89	48.52	45-50%	San Diego	4905	14.56	72.31	13.13	48.56	44.55	1.55	0.98	2.45	1.92
6073018904	18.69	34.48	30-35%	San Diego	5554	12.8	67.5	19.7	52.52	40.33	1.73	0.72	4.7	0
6073018905	25.22	49.24	45-50%	San Diego	6891	14.28	76.62	9.1	64.11	28.89	2.83	0	2.32	1.84
6073018906	24.85	48.41	45-50%	San Diego	6798	16.5	70.05	13.45	56.19	36.11	4.09	0	2.08	1.52
6073019001	13.49	21.68	20-25%	San Diego	5837	8.03	55.53	36.44	19.84	74.64	0	0	2.71	2.81
6073019002	15.97	27.74	25-30%	San Diego	2175	10.02	73.15	16.83	37.47	54.07	2.11	0.18	5.47	0.69
6073019101	23.89	46.51	45-50%	San Diego	6925	15.16	70.17	14.67	24.3	45.57	2.99	19.32	4.97	2.84
6073019103	4.20	1.88	1-5% (lowest scores)	San Diego	5682	13.36	68.9	17.74	25.89	68.09	0.76	0	3.41	1.85
6073019105	11.66	16.94	15-20%	San Diego	5716	7	64.66	28.34	17.84	69.33	0	0.31	8.3	4.22
6073019106	16.78	29.90	25-30%	San Diego	10544	15.2	72.12	12.68	33.95	48.51	0.64	7.94	3.55	5.41
6073019107	9.40	11.41	10-15%	San Diego	2067	14.76	62.36	22.88	26.56	57.72	0.92	9.58	1.31	3.92
6073019203	12.39	18.99	15-20%	San Diego	2826	11.15	71.87	16.99	27.78	61.29	2.48	0	3.43	5.02
6073019205	22.08	42.32	40-45%	San Diego	6273	15.73	71.75	12.51	59.4	30.97	4.46	0	3.71	1.45
6073019206	18.43	33.75	30-35%	San Diego	5909	15.7	74.89	9.41	70.81	21.05	2.66	0	5.48	0
6073019207	22.44	43.13	40-45%	San Diego	9668	12.81	71.75	15.44	45.98	45.79	4.45	0.22	2.77	0.8
6073019208	14.21	23.54	20-25%	San Diego	3369	13.77	64.68	21.55	22.53	70.29	0.03	1.16	2.91	3.09
6073019301	9.41	11.45	10-15%	San Diego	6726	11.51	75.78	12.71	27.42	55.78	2.71	0	8.12	5.98
6073019302	23.87	46.41	45-50%	San Diego	7692	11.13	70.81	18.06	23.22	57.79	4.07	0.68	8.3	5.95
6073019303	17.15	30.66	30-35%	San Diego	7921	13.32	73.56	13.12	39.35	52.22	1.06	0.2	2.63	4.54
6073019403	21.17	40.33	40-45%	San Diego	5270	10.89	80.83	8.27	49.41	34.48	3.89	0	11.35	0.87
6073019404	22.45	43.18	40-45%	San Diego	3409	11.62	77.88	10.5	78.64	15.08	0.06	0.53	5.34	0.35
6073019405	15.55	26.80	25-30%	San Diego	3994	15.77	79.19	5.03	64.02	29.57	2.73	0	1.58	2.1
6073019406	16.51	29.12	25-30%	San Diego	4888	14.77	71.95	13.28	51.98	39.71	2.58	0.33	3.72	1.68
6073019501	21.45	41.04	40-45%	San Diego	4068	21.95	75.57	2.48	83.19	9.37	1.6	0	4.82	1.03
6073019502	24.72	48.18	45-50%	San Diego	5928	20.48	74.76	4.76	87.62	10.39	1.16	0	0.17	0.66
6073019503	18.75	34.64	30-35%	San Diego	5638	15.7	78.68	5.62	56.56	31.25	4.22	0.09	6.46	1.42
6073019601	19.73	36.81	35-40%	San Diego	7468	14.97	76.51	8.52	46.6	45.41	1.87	3.25	1.29	1.58
6073019602	11.84	17.46	15-20%	San Diego	5397	15.45	69.96	14.58	43.08	48.23	4.04	0	2.02	2.63
6073019701	23.90	46.55	45-50%	San Diego	7214	11.08	78.08	10.84	29.08	51.59	5.88	0.3	7.92	5.23
6073019702	18.18	33.17	30-35%	San Diego	5070	12.76	71.48	15.76	27.57	65.86	1.22	0.18	3.12	2.05
6073019803	12.30	18.73	15-20%	San Diego	5115	10.56	76.03	13.41	10.5	71.26	1.82	1.08	10.32	5.02
6073019804	3.96	1.45	1-5% (lowest scores)	San Diego	4412	11.92	67.77	20.31	10.79	73.41	0.23	0.2	11.83	3.54
6073019805	21.85	41.84	40-45%	San Diego	4264	14.92	61.19	23.9	42.31	48.05	1.69	0.16	6.14	1.64
6073019806	14.94	25.42	25-30%	San Diego	12647	16.81	69.4	13.79	24.35	59.04	2.17	0	12.52	1.93
6073019808	10.20	13.44	10-15%	San Diego	4354	5.44	42.03	52.53	5.65	83.79	0	0	8.54	2.02
6073019809	8.10	8.77	5-10%	San Diego	3987	5.47	65.06	29.47	12.42	72.41	1.56	0	7.95	5.67
6073019902	17.51	31.53	30-35%	San Diego	4276	14.41	75.26	10.34	42.7	45.23	4.14	0	4.16	3.77
6073019903	10.41	13.84	10-15%	San Diego	5035	17.12	68.92	13.96	35.47	57.3	4.07	0	0.95	2.2
6073019904	12.24	18.56	15-20%	San Diego	6916	9.82	74.77	15.41	21.57	67.57	0	0	7.29	3.57
6073019905	12.33	18.82	15-20%	San Diego	4309	11.07	70.78	18.15	22.95	57.16	5.08	0	8.26	6.54
6073020013	6.71	6.18	5-10%	San Diego	14679	14.17	72.76	13.07	13.24	75.52	0.5	0	6.91	3.83
6073020014	5.84	4.40	1-5% (lowest scores)	San Diego	7835	9.41	71.82	18.77	11.68	73.01	1.6	0.28	8.33	5.11
6073020015	7.24	7.21	5-10%	San Diego	5001	11.68	68.07	20.26	6.82	82.56	0.84	0	6.28	3.5
6073020016	5.25	3.45	1-5% (lowest scores)	San Diego	9713	15.31	69.6	15.09	9.09	82.05	0.02	0	5.41	3.43
6073020017	22.55	43.41	40-45%	San Diego	3342	11.52	75.73	12.75	46.74	42.49	4.13	0	4.4	2.24
6073020018	30.49	59.62	55-60%	San Diego	8741	17.16	76.27	6.57	74.19	17.78	1.24	0.74	4.05	2
6073020019	12.45	19.09	15-20%	San Diego	7093	10.8	57.18	32.02	33.84	54.81	0.44	0	9.7	1.21
6073020020	12.47	19.18	15-20%	San Diego	7883	18.62	70.38	11	27.58	42.07	3.63	0	22.8	3.93

6073020021	18.18	33.16	30-35%	San Diego	6701	17.16	75.68	7.16	59.98	21.97	0.27	0	14.8	2.98
6073020022	11.86	17.56	15-20%	San Diego	6847	11.89	70.21	17.91	34.61	48.98	2.07	0	11.8	2.53
6073020023	10.94	15.33	15-20%	San Diego	4656	12.09	72.64	15.27	35.98	48.5	2.36	0.43	5.54	7.2
6073020024	10.00	12.91	10-15%	San Diego	4517	7.31	71.53	21.16	39.05	48.02	0.8	1.44	5.85	4.85
6073020025	20.86	39.70	35-40%	San Diego	4771	12.97	71.1	15.93	30.71	51.85	1.11	0	8.82	7.5
6073020026	11.17	15.86	15-20%	San Diego	4461	10.78	66.44	22.78	16.05	64.22	2.4	0	13.14	4.19
6073020027	6.50	5.76	5-10%	San Diego	17461	16.55	68.16	15.29	16.79	62.25	4.73	0.22	10.78	5.23
6073020028	16.52	29.16	25-30%	San Diego	4825	19.88	78.57	1.55	95.63	1.93	0.41	0	1.55	0.48
6073020029	30.00	58.65	55-60%	San Diego	5808	10.04	74.79	15.17	62.72	28.99	2.36	0.24	4.19	1.5
6073020103	14.52	24.38	20-25%	San Diego	10191	11.71	70.62	17.67	24.55	54.22	1.31	0	15.83	4.08
6073020105	14.44	24.13	20-25%	San Diego	4029	10.95	74.61	14.45	44.9	43.51	4.1	0	3.62	3.87
6073020106	8.96	10.56	10-15%	San Diego	3704	5.67	80.53	13.8	48.27	39.61	0.16	0.84	6.34	4.78
6073020107	8.43	9.47	5-10%	San Diego	3923	14.86	74.64	10.5	39.08	45.14	0.66	0	9.12	5.99
6073020108	25.55	50.00	50-55%	San Diego	6524	17.92	72.7	9.38	63.73	24.98	0.61	0	10.25	0.41
6073020109	15.51	26.75	25-30%	San Diego	5405	12.27	78.65	9.08	60.17	25.33	0.56	0	11.4	2.55
6073020202	30.39	59.42	55-60%	San Diego	6789	21.11	73.24	5.66	81.93	10.93	2.81	0.35	3.11	0.87
6073020206	24.24	47.25	45-50%	San Diego	6077	17.54	76.25	6.2	74.54	19.02	1.43	0	4.36	0.64
6073020207	29.43	57.64	55-60%	San Diego	4794	15.29	78.72	5.99	83.42	12.43	0.96	0	2.61	0.58
6073020208	14.25	23.70	20-25%	San Diego	2565	10.68	80.74	8.58	60.23	26.86	4.91	0	3.82	4.17
6073020209	21.66	41.39	40-45%	San Diego	5224	14.68	67.08	18.24	57.14	30.67	1.88	0	6.68	3.64
6073020210	19.00	35.14	35-40%	San Diego	5084	16.03	74.67	9.3	55.02	30.59	1.71	0	6.04	6.65
6073020211	27.81	54.54	50-55%	San Diego	6481	12.42	76.89	10.69	60.84	29.04	4.89	0	2.14	3.09
6073020213	25.02	48.76	45-50%	San Diego	3865	18.71	74.46	6.83	84.37	9.62	2.72	0.13	2.02	1.14
6073020214	31.10	60.84	60-65%	San Diego	6194	16.45	74.98	8.57	79.51	15.84	2.16	0.47	1.71	0.31
6073020304	13.35	21.37	20-25%	San Diego	6813	11.08	69.31	19.61	23.4	65.55	0.6	0	7.38	3.07
6073020305	11.43	16.44	15-20%	San Diego	6221	15.69	70.71	13.6	26.23	48.35	4.47	6.86	8.81	5.27
6073020306	18.60	34.20	30-35%	San Diego	9659	12.71	73.81	13.48	22.06	58.56	3.14	0	12.63	3.61
6073020307	16.72	29.66	25-30%	San Diego	7434	11.08	72.07	16.84	34.92	45.68	1.83	0	8.74	8.82
6073020308	24.67	48.11	45-50%	San Diego	5815	11.83	64.18	23.99	45.12	41.98	3.18	0	7.74	1.98
6073020309	21.82	41.82	40-45%	San Diego	4410	13.54	77.19	9.27	37.57	47.07	0.41	0	13.17	1.77
6073020401	4.67	2.50	1-5% (lowest scores)	San Diego	2208	7.47	62.5	30.03	12.64	83.51	0.59	0	2.81	0.45
6073020403	26.46	51.85	50-55%	San Diego	3705	14.74	72.01	13.25	30.53	50.04	3.35	1.05	12.42	2.62
6073020404	20.67	39.26	35-40%	San Diego	5025	9.33	74.61	16.06	35.92	47.74	4.32	0.02	9.1	2.91
6073020405	9.75	12.34	10-15%	San Diego	3505	6.11	64.25	29.64	20.54	68.67	0.54	0	7.3	2.94
6073020500	33.29	64.55	60-65%	San Diego	5078	14.14	73.2	12.66	68.91	23.97	0.67	0.08	4.79	1.6
6073020601	27.72	54.36	50-55%	San Diego	6234	13.83	81.54	4.64	73.4	17.48	1.27	0.4	2.86	4.59
6073020602	29.46	57.73	55-60%	San Diego	6022	14.1	75.87	10.03	48.52	42.89	2.06	0.58	2.16	3.79
6073020705	11.86	17.55	15-20%	San Diego	4840	10.31	76.94	12.75	37.6	49.79	0.58	0.85	10.08	1.1
6073020706	8.84	10.33	10-15%	San Diego	6597	6.26	74.55	19.19	18.8	70.06	1.76	0	3.93	5.46
6073020707	26.53	52.04	50-55%	San Diego	5122	17.24	76.86	5.9	50.57	36.86	1.39	0.25	3.51	7.42
6073020708	18.57	34.11	30-35%	San Diego	3640	9.86	73.85	16.29	28.43	59.48	3.19	0	5.77	3.13
6073020709	17.51	31.56	30-35%	San Diego	8339	13.69	72.83	13.48	30.65	51.31	1.52	0	11.71	4.8
6073020710	11.93	17.71	15-20%	San Diego	1818	11.55	63.26	25.19	18.92	62.98	1.16	0	14.63	2.31
6073020801	9.60	11.94	10-15%	San Diego	5677	9.34	70.07	20.59	20.66	71.22	1.09	0	5	2.03
6073020805	12.78	19.89	15-20%	San Diego	3322	9.9	77.24	12.85	41.69	54.61	0.06	0	3.07	0.57
6073020806	15.76	27.24	25-30%	San Diego	6379	14.08	72.19	13.73	41.84	54.1	0.96	0	0.94	2.16
6073020807	13.96	22.88	20-25%	San Diego	2720	8.79	70.4	20.81	10.99	82.87	0.81	0.92	1.43	2.98
6073020809	8.69	9.92	5-10%	San Diego	7493	15.65	71.85	12.49	41.2	49.91	0.75	0.61	1.33	6.19
6073020810	5.76	4.21	1-5% (lowest scores)	San Diego	5229	13.77	74.34	11.9	11	84.7	1.45	0	0.75	2.1
6073020811	5.16	3.28	1-5% (lowest scores)	San Diego	6100	10.72	73.98	15.3	15.03	79.51	0.36	0.41	3.31	1.38
6073020902	10.17	13.36	10-15%	San Diego	2235	9.62	69.49	20.89	16.33	77.36	2.06	1.03	1.52	1.7
6073020903	15.71	27.14	25-30%	San Diego	3045	7.09	60.43	32.48	11.46	68.87	1.18	16.09	1.9	0.49
6073020904	13.58	21.94	20-25%	San Diego	2223	7.2	62.03	30.77	13.45	84.08	0.04	0	0	2.43
6073021000	18.24	33.35	30-35%	San Diego	2706	5.73	53.51	40.76	22.58	70.88	5.1	0	0.04	1.4
6073021100	32.34	63.05	60-65%	San Diego	7998	12.57	69.45	17.98	42.94	48.41	1.71	4.8	0.11	2.03
6073021202	6.04	4.75	1-5% (lowest scores)	San Diego	3727	15.08	68.47	16.45	25.01	64.9	2.01	5.18	0.08	2.82
6073021204	6.06	4.79	1-5% (lowest scores)	San Diego	5545	9.83	71.61	18.56	8.19	85.88	0.78	0.18	3.73	1.24
6073021205	8.84	10.34	10-15%	San Diego	6813	15.81	67.2	17	16.04	74.65	2.73	0.13	2.52	3.92

6073021206	4.27	2.00	1-5% (lowest scores)	San Diego	3274	10.17	71.9	17.93	8.89	86.07	0	0.27	0.95	3.82
6073021302	17.18	30.70	30-35%	San Diego	7616	8.04	81.79	10.18	38.31	41.75	11.02	0.54	7.81	0.56
6073021303	8.74	10.07	10-15%	San Diego	9456	11.18	71.51	17.31	28.56	47.93	2.92	0	18.49	2.1
6073021304	10.80	14.99	10-15%	San Diego	2699	7	67.58	25.42	23.23	68.66	2.74	0	3.26	2.11
6073021400	20.72	39.31	35-40%	San Diego	7407	16.42	73.34	10.25	18.94	59.11	4.54	0	11.06	6.36
6073021500	8.98	10.59	10-15%	San Diego	11078	12.48	79.78	7.75	10.76	51.45	0.45	0.78	32.87	3.69
6073021600	14.52	24.39	20-25%	San Diego	3282	15.69	70.2	14.11	18.86	68.77	5.24	0	2.86	4.27
6073021800	2.94	0.66	1-5% (lowest scores)	San Diego	2403	10.4	65.54	24.05	19.02	76.03	0.33	0	2.87	1.75
6073021900	42.86	79.26	75-80%	San Diego	7107	3.64	92.7	3.66	44.15	28.77	14.2	0.62	9.87	2.39
6073022000	40.71	76.19	75-80%	San Diego	4681	15.23	75.39	9.38	44.86	9.51	4.96	0	37.84	2.84
6073022100	15.95	27.69	25-30%	San Diego	10005	10.3	76.1	13.59	25.05	58.59	1.47	0.32	9.68	4.9
6075010100	21.69	41.52	40-45%	San Francisco	3889	2.47	75.03	22.5	12.21	39.01	6.07	0	39.44	3.27
6075010200	9.42	11.49	10-15%	San Francisco	4167	3.41	72.67	23.93	3.26	80.71	2.02	0	12.07	1.94
6075010300	14.47	24.21	20-25%	San Francisco	4359	4.34	78.16	17.5	9.34	59.44	0	0	29.04	2.18
6075010400	13.63	22.02	20-25%	San Francisco	4536	6.86	79.74	13.4	7.58	62.94	0.2	0.18	23.06	6.04
6075010500	16.95	30.37	30-35%	San Francisco	2779	6.91	63.94	29.15	7.56	49.8	9.07	0	23.68	9.9
6075010600	23.09	44.74	40-45%	San Francisco	3429	1.6	77.46	20.94	4.29	35.37	1.87	0	55.7	2.77
6075010700	29.69	58.11	55-60%	San Francisco	5548	4.74	67.7	27.56	6	14.67	0	0.59	77.65	1.08
6075010800	18.85	34.85	30-35%	San Francisco	5038	6.01	70.25	23.74	6.19	46.35	2.2	0	42.66	2.6
6075010900	10.15	13.29	10-15%	San Francisco	4486	3.08	75.95	20.98	4.35	65.85	1.54	0	24.79	3.48
6075011000	15.50	26.69	25-30%	San Francisco	5127	3.24	84.49	12.27	6.14	51.57	2.09	0	40.2	0
6075011100	19.08	35.35	35-40%	San Francisco	4835	3.85	81.24	14.91	10.13	46.04	4.18	0	35.72	3.93
6075011200	18.66	34.40	30-35%	San Francisco	3329	4.3	74.32	21.39	4.51	58.73	5.08	0	28.6	3.09
6075011300	27.82	54.56	50-55%	San Francisco	2843	5.87	59.13	35	2.64	15.51	0	0	78.19	3.66
6075011700	24.94	48.61	45-50%	San Francisco	1790	3.63	78.1	18.27	10.34	31.4	3.74	0	48.04	6.48
6075011800	24.10	46.96	45-50%	San Francisco	1570	4.52	73.12	22.36	1.53	12.29	0.57	0	83.44	2.17
6075011901	16.40	28.76	25-30%	San Francisco	2699	1.52	84.88	13.6	13.45	51.91	2.19	0	23.82	8.63
6075011902	12.91	20.30	20-25%	San Francisco	2712	4.2	80.79	15.01	7.45	55.68	0.92	0	31.01	4.94
6075012000	30.07	58.79	55-60%	San Francisco	3973	1.96	88.57	9.46	15.3	39.14	6.07	0.23	32.62	6.64
6075012100	20.78	39.50	35-40%	San Francisco	3859	2.25	91.03	6.71	18.14	44.1	4.53	0	29.36	3.86
6075012201	22.90	44.21	40-45%	San Francisco	4620	8.9	82.71	8.4	29.07	40.45	6.02	0	17.9	6.56
6075012202	24.26	47.34	45-50%	San Francisco	3181	4.94	77.18	17.89	19.02	36.12	13.49	1.38	24.36	5.63
6075012301	30.83	60.36	60-65%	San Francisco	2117	6.28	75.01	18.71	28.15	30.23	5.29	0	33.87	2.46
6075012302	26.41	51.66	50-55%	San Francisco	2713	1.81	90.71	7.48	22.67	40.07	5.05	0	29.38	2.84
6075012401	29.83	58.36	55-60%	San Francisco	4667	6.77	82	11.23	27.04	32.08	11.16	0.13	26.31	3.28
6075012402	30.12	58.95	55-60%	San Francisco	4662	4.48	84.15	11.37	21.69	33.16	8.39	0.04	32.54	4.18
6075012501	39.30	73.84	70-75%	San Francisco	4293	8.27	70.49	21.24	27.79	23.57	9.22	0.4	33.59	5.43
6075012502	41.16	76.85	75-80%	San Francisco	3674	7.16	61.08	31.76	16.11	19.79	14.86	7.54	39.28	2.42
6075012601	6.67	6.06	5-10%	San Francisco	2516	11.41	79.09	9.5	9.46	76.03	2.46	0	11.61	0.44
6075012602	7.29	7.30	5-10%	San Francisco	2844	7.21	80.41	12.38	3.9	75.88	0.46	0	17.44	2.32
6075012700	9.02	10.65	10-15%	San Francisco	4092	3.25	78.59	18.16	7.21	77.39	0.88	0	9.38	5.13
6075012800	7.27	7.24	5-10%	San Francisco	4556	11.48	76.58	11.94	11.65	78.47	0.04	0	8.19	1.65
6075012901	4.45	2.18	1-5% (lowest scores)	San Francisco	2783	8.08	83.04	8.88	5.39	77.18	0.04	0.32	14.02	3.05
6075012902	5.29	3.56	1-5% (lowest scores)	San Francisco	3865	2.64	82.33	15.03	6.16	79.2	2.15	0.26	9.13	3.1
6075013000	3.29	0.87	1-5% (lowest scores)	San Francisco	4719	3.43	86.16	10.4	5.21	83.28	0	0.66	8.54	2.31
6075013101	10.02	12.99	10-15%	San Francisco	4061	6.48	83.62	9.9	7.14	71.9	2.09	0	15.49	3.37
6075013102	6.97	6.73	5-10%	San Francisco	3012	6.87	79.61	13.51	7.93	65.44	0.3	0	18.89	7.44
6075013200	8.89	10.45	10-15%	San Francisco	4292	9.32	71.39	19.29	7.81	68.57	2.68	0	18.48	2.47
6075013300	10.63	14.47	10-15%	San Francisco	4634	12.54	67.89	19.57	7.34	72.14	1.64	0	13.29	5.59
6075013400	9.53	11.78	10-15%	San Francisco	3742	8.18	77.45	14.38	7.38	67.21	0.88	0	16.86	7.67
6075013500	10.18	13.39	10-15%	San Francisco	2606	8.48	74.02	17.5	5.99	62.89	2.38	0.92	22.49	5.33
6075015100	10.23	13.57	10-15%	San Francisco	2624	3.01	70.08	26.91	5.64	49.89	2.59	0	37.27	4.61
6075015200	15.69	27.07	25-30%	San Francisco	4277	7.36	71.17	21.46	9.24	57.66	4.35	0	24.5	4.26
6075015300	13.68	22.15	20-25%	San Francisco	2289	8.69	78.9	12.41	12.01	57.93	11.62	0	13.98	4.46
6075015400	10.11	13.19	10-15%	San Francisco	5951	10.59	77.5	11.91	5.26	64.38	0.6	0	22.82	6.94
6075015500	13.47	21.60	20-25%	San Francisco	3551	1.86	57.56	40.58	9.26	46.21	1.63	0.23	33.51	9.15
6075015600	10.12	13.21	10-15%	San Francisco	3506	7.22	75.73	17.06	14.6	38.31	2.51	0.4	36.22	7.96
6075015700	11.70	17.04	15-20%	San Francisco	8904	6.33	84.83	8.84	12.79	47.3	6.12	0	24.14	9.64

6075015801	21.14	40.28	40-45%	San Francisco	3837	13.11	68.13	18.76	6.25	40.16	26.45	0	19.89	7.25
6075015802	6.79	6.35	5-10%	San Francisco	3412	8.41	81.36	10.23	10.43	62.75	7.65	0	9.47	9.7
6075015900	13.93	22.81	20-25%	San Francisco	4832	3.27	78.13	18.61	12.33	30.61	7.55	1.47	42.2	5.84
6075016000	19.17	35.58	35-40%	San Francisco	2562	1.87	72.52	25.6	7.3	50.62	9.76	0	26.58	5.74
6075016100	20.11	37.73	35-40%	San Francisco	5340	4.68	71.87	23.45	10.77	20.86	35.39	0	25.75	7.23
6075016200	18.60	34.23	30-35%	San Francisco	3278	2.41	87.71	9.88	8.39	56.74	5.61	0	24.53	4.73
6075016300	14.23	23.60	20-25%	San Francisco	4658	8.42	82.91	8.67	13.01	58.52	7.21	0	12.77	8.48
6075016400	6.80	6.42	5-10%	San Francisco	4008	7.78	83.51	8.71	11.18	68.66	6.96	0.4	7.58	5.21
6075016500	12.25	18.60	15-20%	San Francisco	5267	6.7	79.46	13.84	7.97	69.36	5.18	0	11.13	6.36
6075016600	10.52	14.17	10-15%	San Francisco	5691	3.34	87.42	9.24	3.65	75.36	4.52	0	11.3	5.17
6075016700	9.23	11.09	10-15%	San Francisco	5376	6.88	87.3	5.82	12.35	66.82	6.73	0	9.9	4.2
6075016801	9.10	10.82	10-15%	San Francisco	4145	4.78	90.06	5.16	16.24	59.59	2.46	0	14.79	6.92
6075016802	22.22	42.60	40-45%	San Francisco	3622	6.41	83.27	10.33	17.73	49.67	9.3	0.66	19.8	2.84
6075016900	10.61	14.44	10-15%	San Francisco	3254	7.44	84.76	7.81	10.36	62.23	4.73	1.14	16.84	4.7
6075017000	4.92	2.94	1-5% (lowest scores)	San Francisco	4287	5.04	80.83	14.14	5.11	70.31	1.75	0	16.71	6.13
6075017101	7.03	6.83	5-10%	San Francisco	4113	11.84	77.46	10.7	2.12	76.93	4.52	0	11.09	5.35
6075017102	6.39	5.46	5-10%	San Francisco	4095	12.45	77.14	10.4	12.06	69.33	1.98	0.02	10.11	6.5
6075017601	36.74	70.16	70-75%	San Francisco	10343	7.38	82.38	10.24	20.39	23.09	10.7	0	40.36	5.46
6075017700	28.35	55.58	55-60%	San Francisco	1915	9.19	83.76	7.05	33	35.04	3.19	0.52	22.72	5.54
6075017801	27.87	54.70	50-55%	San Francisco	3891	3.86	49.34	46.8	8.07	28.06	2.83	0	58.21	2.83
6075017802	40.37	75.66	75-80%	San Francisco	6367	5.86	87.64	6.5	18.94	33.08	7.59	0.09	34.53	5.76
6075017902	50.63	88.50	85-90%	San Francisco	3008	3.82	94.28	1.89	26.03	27.93	22.24	0.83	13	9.97
6075018000	30.26	59.20	55-60%	San Francisco	3457	5.18	89.53	5.29	11.8	46.11	11.28	0.78	23.43	6.6
6075020100	36.99	70.55	70-75%	San Francisco	6343	4.57	84.09	11.34	33.77	32.41	9.41	0.09	20.32	3.99
6075020200	28.61	56.13	55-60%	San Francisco	6131	4.11	83.9	11.99	13.78	53.11	6.48	0.77	18.78	7.1
6075020300	5.01	3.06	1-5% (lowest scores)	San Francisco	3548	5.5	85.46	9.05	9.84	63.9	4.9	0	14.4	6.96
6075020401	4.04	1.59	1-5% (lowest scores)	San Francisco	3176	3.72	86.21	10.08	7.49	69.14	2.17	0	15.81	5.38
6075020402	6.25	5.22	5-10%	San Francisco	4564	4.1	80.17	15.73	16.21	65.71	1.01	0	12.99	4.08
6075020500	3.27	0.84	1-5% (lowest scores)	San Francisco	3046	8.31	80.37	11.33	6.4	74.66	1.84	0	14.15	2.95
6075020600	4.99	3.04	1-5% (lowest scores)	San Francisco	5191	9.13	78.66	12.21	9.03	71.8	3.47	0	11.27	4.43
6075020700	17.08	30.58	30-35%	San Francisco	4793	7.11	81.74	11.14	22.53	59.32	1.52	0	10.18	6.45
6075020800	24.02	46.79	45-50%	San Francisco	6458	9.03	81.53	9.45	36.4	38.49	2.79	1.32	16.21	4.78
6075020900	28.44	55.79	55-60%	San Francisco	4597	6.53	82.84	10.64	39.09	42.14	2.41	0	13.18	3.18
6075021000	10.80	14.98	10-15%	San Francisco	4523	9.29	78.95	11.76	19.1	59.14	2.06	0	11.98	7.72
6075021100	4.13	1.73	1-5% (lowest scores)	San Francisco	4080	9.95	71.05	19	12.08	67.21	0.29	0	14.68	5.74
6075021200	4.59	2.40	1-5% (lowest scores)	San Francisco	3105	12.85	72.95	14.2	9.18	69.4	1.42	0.03	9.28	10.69
6075021300	1.65	0.11	1-5% (lowest scores)	San Francisco	2590	14.13	74.21	11.66	8.15	71.93	1.74	0	13.51	4.67
6075021400	4.86	2.84	1-5% (lowest scores)	San Francisco	3823	10.25	76.98	12.76	10.7	69.81	0.24	0	16.87	2.38
6075021500	6.80	6.40	5-10%	San Francisco	5674	9.5	81.74	8.76	14.56	60.79	3.33	0.35	13.08	7.9
6075021600	2.60	0.49	1-5% (lowest scores)	San Francisco	4135	4.38	77.03	18.6	11.56	60.19	4.28	0	17.22	6.75
6075021700	5.39	3.69	1-5% (lowest scores)	San Francisco	4556	14.64	66.94	18.42	8.56	52.77	10.18	0	21.6	6.89
6075021800	4.59	2.41	1-5% (lowest scores)	San Francisco	4095	14.29	71.16	14.55	15.92	65.01	3.27	0	11.7	4.1
6075022600	13.77	22.43	20-25%	San Francisco	3213	10.77	84.16	5.07	9.59	53.5	4.36	0	25.65	6.91
6075022702	13.60	21.96	20-25%	San Francisco	2298	7.27	84.46	8.27	13.79	66.75	1.91	0	12.66	4.87
6075022704	13.68	22.14	20-25%	San Francisco	3367	9.83	79.06	11.11	6.36	62.4	0.86	0	19.51	10.87
6075022801	26.81	52.67	50-55%	San Francisco	5769	13.28	78.23	8.49	40.82	37.35	0.55	0	16.9	4.37
6075022802	28.59	56.06	55-60%	San Francisco	2438	6.85	75.59	17.56	35.97	35.4	6.32	0	18.25	4.06
6075022803	20.74	39.38	35-40%	San Francisco	5224	5.97	85.41	8.61	51.01	31.74	2.62	0	12.16	2.47
6075022901	27.56	54.03	50-55%	San Francisco	4856	11.86	82.76	5.37	55.81	32.08	1.81	0	7.27	3.03
6075022902	22.97	44.40	40-45%	San Francisco	2483	5.68	75.11	19.21	41.68	37.13	4.11	0	11.88	5.2
6075022903	25.38	49.65	45-50%	San Francisco	3240	12.31	79.91	7.78	49.66	32.99	3.89	1.11	9.38	2.96
6075023001	49.33	87.19	85-90%	San Francisco	5398	9.45	74.97	15.58	7.67	4.87	11.08	0	73.88	2.5
6075023003	40.26	75.42	75-80%	San Francisco	4084	10.82	72.62	16.55	20.15	8.06	21.11	0	49.73	0.95
6075023102	46.93	84.33	80-85%	San Francisco	4549	15.01	73.51	11.48	20.77	5.25	51.33	0	20.75	1.89
6075023103	50.51	88.40	85-90%	San Francisco	2890	25.71	68.93	5.36	22.6	3.63	50.87	0	18	4.91
6075023200	54.61	92.21	90-95%	San Francisco	3972	11.05	73.74	15.21	43.66	10.15	27.32	0	16.92	1.96
6075023300	44.54	81.44	80-85%	San Francisco	3739	11.18	71.2	17.63	24.58	6.87	14.17	0	53.62	0.75
6075023400	46.98	84.40	80-85%	San Francisco	3661	14.01	72.06	13.93	41.16	8.6	17.92	0	24.89	7.43

6075025100	21.46	41.05	40-45%	San Francisco	3473	12.44	76.85	10.71	16.76	49.7	8.32	1.3	17.65	6.28
6075025200	16.61	29.34	25-30%	San Francisco	5256	13.57	74.9	11.53	22.09	61.82	1.43	0.27	10.56	3.84
6075025300	15.15	25.88	25-30%	San Francisco	4454	11.27	78	10.73	25.91	53.44	0.9	1.03	13.13	5.59
6075025401	15.68	27.05	25-30%	San Francisco	3775	6.89	87.07	6.04	26.57	57.7	1.14	0	9.59	5.01
6075025402	19.47	36.08	35-40%	San Francisco	3427	9.63	73.77	16.6	32.83	34.43	4.7	0	25.85	2.19
6075025403	18.92	34.93	30-35%	San Francisco	4782	12.57	75.35	12.09	33.21	27.06	8.72	0.13	27.33	3.55
6075025500	29.64	58.07	55-60%	San Francisco	9684	8.35	70.13	21.52	31.15	21.6	1.39	0	42.18	3.67
6075025600	18.43	33.74	30-35%	San Francisco	5314	7.47	73.56	18.97	21.28	14.81	1.69	0	57.85	4.37
6075025701	27.11	53.24	50-55%	San Francisco	5088	10.38	70.44	19.18	27.67	10.79	1.38	0	58.95	1.22
6075025702	40.29	75.48	75-80%	San Francisco	4401	7.45	71.1	21.45	25.45	9.27	0.57	0.32	62.79	1.61
6075025800	30.12	58.91	55-60%	San Francisco	2224	10.03	75.49	14.48	28.87	13.31	6.92	0	49.28	1.62
6075025900	20.20	38.00	35-40%	San Francisco	4618	9.03	73.13	17.84	16.91	26.07	9.4	0	45.3	2.32
6075026001	22.03	42.20	40-45%	San Francisco	5986	12.04	74.19	13.77	49.28	10.76	2	0.08	34.58	3.29
6075026002	12.10	18.22	15-20%	San Francisco	3644	6.61	72.45	20.94	28.68	23.52	4.72	0	38.64	4.45
6075026003	14.12	23.35	20-25%	San Francisco	5126	9.23	73.8	16.97	40.75	15.37	1.07	0.6	41.2	0.99
6075026004	20.13	37.77	35-40%	San Francisco	4649	15.57	68.19	16.24	39.66	12.97	2.06	1.08	41.41	2.82
6075026100	28.50	55.89	55-60%	San Francisco	7455	7.81	76.61	15.59	25.46	7.2	1.26	0	63.45	2.63
6075026200	21.25	40.44	40-45%	San Francisco	7903	5.5	74.5	19.99	28.39	4.77	1.06	0	63.47	2.3
6075026301	19.06	35.30	35-40%	San Francisco	5083	8.97	70.16	20.87	21.86	11.63	0.89	0.14	65.3	0.2
6075026302	14.03	23.13	20-25%	San Francisco	5255	6.57	77.81	15.62	23.67	11.59	3.2	0	58.42	3.12
6075026303	12.83	20.02	20-25%	San Francisco	4822	10.29	72.07	17.65	27.62	13.81	0.68	0	57.47	0.41
6075026401	27.78	54.45	50-55%	San Francisco	3738	10.35	71.29	18.35	11.53	3.4	9.6	0	74.34	1.12
6075026402	33.51	64.99	60-65%	San Francisco	5102	10.02	79.48	10.51	31.36	8.98	7.74	0.55	46.28	5.1
6075026403	35.70	68.73	65-70%	San Francisco	4082	7.67	74.03	18.3	24.2	7.55	3.36	0	64.46	0.44
6075026404	29.44	57.70	55-60%	San Francisco	2897	9.04	76.32	14.64	24.78	3.56	11.43	0	56.06	4.18
6075030101	9.30	11.18	10-15%	San Francisco	5048	7.9	84.73	7.37	8.56	58.02	1.31	0.87	26.47	4.77
6075030102	6.21	5.13	5-10%	San Francisco	5262	7.72	76.59	15.7	7.58	64.25	1.63	0	23.01	3.52
6075030201	11.32	16.19	15-20%	San Francisco	4529	9.47	77.7	12.83	8.85	44.84	3.18	0	35.64	7.49
6075030202	7.49	7.61	5-10%	San Francisco	4438	7.35	77.33	15.32	10.55	51.76	2.01	0	32.88	2.82
6075030301	7.90	8.31	5-10%	San Francisco	5914	11.18	69.63	19.19	7.46	39.26	2.1	0	44.03	7.15
6075030302	5.60	3.97	1-5% (lowest scores)	San Francisco	4348	9.52	72.1	18.38	9.87	33.37	4.92	0	46.32	5.52
6075030400	7.16	7.10	5-10%	San Francisco	5573	12.92	67.5	19.58	8.6	48.91	0.92	0.16	35.86	5.56
6075030500	5.57	3.93	1-5% (lowest scores)	San Francisco	3230	7.4	63.28	29.32	10.59	45.76	6.5	0	30.68	6.47
6075030600	4.85	2.81	1-5% (lowest scores)	San Francisco	2495	12.71	69.94	17.35	13.59	50.14	2.16	0	25.89	8.22
6075030700	5.67	4.06	1-5% (lowest scores)	San Francisco	7024	11.55	67.75	20.7	10.18	53.5	3.56	0.24	27.69	4.83
6075030800	4.05	1.60	1-5% (lowest scores)	San Francisco	6226	8.43	70.11	21.46	6.34	52.76	4.45	0.21	34.36	1.88
6075030900	10.27	13.68	10-15%	San Francisco	7103	7.62	69.98	22.4	6.79	42.24	1.8	0.24	44.56	4.38
6075031000	8.17	8.86	5-10%	San Francisco	3804	9.54	68.66	21.79	9.15	49.79	1.47	0	36.2	3.39
6075031100	7.52	7.70	5-10%	San Francisco	6437	9.23	72.69	18.08	19.39	44.24	1.94	0	28.34	6.09
6075031201	23.22	44.97	40-45%	San Francisco	6690	7.58	76.86	15.56	15.65	18.15	3.21	0.1	60.99	1.9
6075031202	20.45	38.57	35-40%	San Francisco	3394	11.52	76.28	12.2	10.64	6.51	16.38	0	59.78	6.69
6075031301	19.95	37.44	35-40%	San Francisco	4241	5.47	72.77	21.76	9.57	18.56	13.49	0	53.86	4.53
6075031302	21.82	41.81	40-45%	San Francisco	6109	8.35	75.82	15.83	16.73	10.89	11.23	0	57.1	4.06
6075031400	26.85	52.75	50-55%	San Francisco	7096	10.91	74.9	14.19	17.95	11.16	11.1	0.37	56.93	2.48
6075032601	12.01	17.98	15-20%	San Francisco	5211	7.7	78.49	13.82	11.21	31.34	3.47	0	47.65	6.33
6075032602	15.17	25.95	25-30%	San Francisco	4753	6.02	74.79	19.19	6.4	32.06	0.29	0	60	1.24
6075032700	9.64	12.08	10-15%	San Francisco	6898	7.28	71.64	21.08	6.83	36.79	0.45	0	50.2	5.73
6075032801	16.45	28.93	25-30%	San Francisco	4401	6.07	70.78	23.15	8.16	23.54	2.89	0	61.53	3.89
6075032802	16.62	29.40	25-30%	San Francisco	4432	6.5	72.61	20.89	8.15	29.17	0.74	0.27	56.54	5.12
6075032901	9.47	11.62	10-15%	San Francisco	5615	7.78	70.76	21.46	6.82	22.51	0.23	0	66.7	3.74
6075032902	11.32	16.20	15-20%	San Francisco	4457	7.36	70.9	21.74	3.07	27.28	0	0	67.74	1.91
6075033000	16.16	28.35	25-30%	San Francisco	8127	8.05	70.46	21.5	8.34	37.05	0.74	0	47.91	5.96
6075033100	18.65	34.37	30-35%	San Francisco	3895	9.83	65.8	24.36	4.24	37.28	0.44	0	51.16	6.88
6075033201	21.42	40.94	40-45%	San Francisco	4551	1.43	95.91	2.66	35.55	29.49	7.08	0	22.43	5.45
6075033203	19.03	35.24	35-40%	San Francisco	3956	3.67	84.4	11.93	15.55	45.4	3.39	0	30.84	4.83
6075033204	29.96	58.60	55-60%	San Francisco	4698	5.83	84.76	9.41	21.71	29.4	8.47	1.06	30.23	9.13
6075035100	8.66	9.83	5-10%	San Francisco	9116	11.8	72.66	15.53	7.58	30.02	1.38	0.27	51.55	9.19
6075035201	11.77	17.25	15-20%	San Francisco	5704	12.55	69.69	17.76	7.35	35.82	0.6	0.26	53.66	2.31

6075035202	12.09	18.19	15-20%	San Francisco	5244	9.76	75.44	14.8	11.14	40.31	7.07	0.74	34.62	6.12
6075035300	15.01	25.59	25-30%	San Francisco	7487	10.77	68.72	20.52	7.87	30.28	0	0.15	57.71	3.99
6075035400	13.52	21.73	20-25%	San Francisco	7342	8.99	70.7	20.31	6.29	34.34	2.53	0	49.44	7.4
6075040100	10.97	15.39	15-20%	San Francisco	4560	9.47	74.74	15.79	7.68	49.63	0.79	0	38.18	3.73
6075040200	15.38	26.42	25-30%	San Francisco	5600	10.2	71.41	18.39	6.8	56.7	0.88	0	31.57	4.05
6075042601	16.11	28.14	25-30%	San Francisco	4004	6.59	73.78	19.63	8.44	46.03	4.92	0.15	33.87	6.59
6075042602	10.86	15.17	15-20%	San Francisco	2861	10.38	67.53	22.09	4.86	52.25	1.26	0	34.67	6.96
6075042700	20.78	39.51	35-40%	San Francisco	5379	9.54	71.44	19.02	8.05	38.3	6.53	0	43.45	3.68
6075042800	13.45	21.57	20-25%	San Francisco	2507	14.72	65.74	19.55	4.15	68.01	0	0	18.43	9.41
6075045100	11.43	16.45	15-20%	San Francisco	5126	7.98	76.69	15.33	11.37	45.28	2.77	0.57	38.12	1.89
6075045200	16.27	28.52	25-30%	San Francisco	7286	6.78	80.89	12.33	7.12	43.82	2.7	0	39.87	6.48
6075047600	11.85	17.51	15-20%	San Francisco	5670	8.54	75.17	16.3	6.72	38.99	0.46	0	44.25	9.58
6075047701	21.17	40.36	40-45%	San Francisco	4569	6.57	75.33	18.1	7.09	39.33	0	0	45.31	8.27
6075047702	16.64	29.44	25-30%	San Francisco	3927	9.17	73.21	17.62	5.19	39.9	0.59	0	51.24	3.08
6075047801	16.81	29.95	25-30%	San Francisco	4421	10.31	69.33	20.36	5.68	37.86	1.99	0.11	45.85	8.5
6075047802	17.97	32.68	30-35%	San Francisco	3869	6.02	78.06	15.92	10.03	40.45	0.52	0	45.28	3.72
6075047901	15.29	26.17	25-30%	San Francisco	7589	9.18	73.9	16.92	4.81	39.03	1.63	0	49.2	5.32
6075047902	20.25	38.10	35-40%	San Francisco	3632	6.88	72.11	21.01	4.98	45.73	0	0	39.51	9.77
6075060100	3.40	0.97	1-5% (lowest scores)	San Francisco	4226	10.93	85.33	3.74	13.91	68.86	2.11	1.3	8.4	5.42
6075060400	17.32	31.10	30-35%	San Francisco	1596	6.39	59.15	34.46	10.46	51	5.2	0.63	25.5	7.21
6075060502	19.91	37.37	35-40%	San Francisco	3511	17.89	74.94	7.18	26.29	2.73	27.09	0	40.1	3.79
6075060700	21.36	40.73	40-45%	San Francisco	13222	7.79	84.11	8.1	12.6	36.77	2.22	0	44.86	3.55
6075061000	40.57	76.00	75-80%	San Francisco	4839	11.86	73.09	15.04	9.32	11.82	15.04	0	60.63	3.18
6075061100	26.77	52.53	50-55%	San Francisco	4477	7.91	62.81	29.28	0.18	2.97	0.22	0.98	94.55	1.09
6075061200	42.61	78.87	75-80%	San Francisco	3842	3.96	78.84	17.2	32.48	8.02	27.95	0.62	29.96	0.96
6075061400	31.10	60.82	60-65%	San Francisco	6283	11.59	79.96	8.45	22.04	39.44	9.76	0.41	22.19	6.16
6075061500	15.90	27.58	25-30%	San Francisco	16968	6.83	84.84	8.33	6.68	44.67	1.76	0	43.23	3.66
6075980200	NA	NA	NA	San Francisco	312	4.49	34.94	60.58	3.53	46.79	16.03	0	33.65	0
6075980300	NA	NA	NA	San Francisco	63	0	100	0	0	92.06	0	0	7.94	0
6075980501	27.13	53.28	50-55%	San Francisco	507	16.57	51.48	31.95	19.92	0	22.49	0	57.6	0
6075980600	45.77	82.94	80-85%	San Francisco	690	11.59	79.71	8.7	21.3	14.06	33.77	0	24.64	6.23
6075980900	NA	NA	NA	San Francisco	253	11.46	77.47	11.07	18.97	51.78	7.11	0	22.13	0
6077000100	77.87	99.89	95-100% (highest scores)	San Joaquin	3688	16.11	68.66	15.24	54.18	13.67	19.36	0.38	9.41	3.01
6077000300	75.61	99.74	95-100% (highest scores)	San Joaquin	2048	15.82	66.5	17.68	51.9	14.36	18.21	0	12.84	2.69
6077000401	41.91	77.90	75-80%	San Joaquin	3034	8.77	71.85	19.38	46.14	38.89	11.8	0	1.52	1.65
6077000402	53.92	91.58	90-95%	San Joaquin	4153	14.47	70.46	15.07	46.23	22.88	13.99	1.32	13.2	2.38
6077000500	48.99	86.71	85-90%	San Joaquin	2280	20.7	71.45	7.85	75.75	15.13	2.06	0.22	5.92	0.92
6077000600	57.81	94.40	90-95%	San Joaquin	1703	13.74	79.8	6.46	74.93	6.22	3.7	0	12.51	2.64
6077000700	86.65	99.99	95-100% (highest scores)	San Joaquin	4680	12.41	77.26	10.32	66.92	8.14	8.35	0	14.94	1.65
6077000801	72.68	99.41	95-100% (highest scores)	San Joaquin	7624	20.79	73.27	5.94	69.96	3.78	4.39	0	16.35	5.51
6077000900	63.38	97.26	95-100% (highest scores)	San Joaquin	5620	16.98	73.06	9.96	56.64	20.62	14.63	0.12	4.09	3.9
6077001000	47.76	85.19	85-90%	San Joaquin	5185	12.05	73.33	14.62	44.26	31.86	12.94	0.14	6.65	4.15
6077001101	32.95	63.94	60-65%	San Joaquin	5220	11.09	71.63	17.28	45.94	35.11	6.72	0	5.84	6.38
6077001102	35.95	69.06	65-70%	San Joaquin	4763	10.79	78.08	11.13	49.82	34.43	8.44	0.13	6.53	0.65
6077001200	16.68	29.58	25-30%	San Joaquin	5515	5.98	78.97	15.05	25.31	54.96	2.28	0.65	13.6	3.19
6077001300	37.31	71.00	70-75%	San Joaquin	5227	12.59	70.94	16.47	48.08	27.82	10.39	1.28	5.76	6.68
6077001400	42.82	79.22	75-80%	San Joaquin	4677	14.48	64.57	20.95	45.41	31	2.01	0.02	15.67	5.88
6077001500	51.98	90.02	90-95%	San Joaquin	10290	22.67	69.97	7.36	60.39	14.32	5.32	0.58	16.7	2.69
6077001600	48.86	86.59	85-90%	San Joaquin	2292	16.84	75.79	7.37	61.3	23.95	4.67	0	8.73	1.35
6077001700	54.36	91.99	90-95%	San Joaquin	3957	19.41	73.67	6.92	74.75	21.1	1.77	0	1.69	0.68
6077001800	57.23	94.04	90-95%	San Joaquin	4438	16.02	72.42	11.56	80.31	16.99	1.46	0	0.77	0.47
6077001900	62.42	96.73	95-100% (highest scores)	San Joaquin	4681	18.35	73.47	8.18	77.48	6.07	15.17	0	0.32	0.96
6077002000	63.29	97.21	95-100% (highest scores)	San Joaquin	3357	21.86	64.94	13.2	80.34	7.86	7.48	0	2.59	1.73
6077002100	49.86	87.68	85-90%	San Joaquin	5727	17.78	73.53	8.7	73.53	2.3	14.72	0	8.7	0.75
6077002201	64.08	97.52	95-100% (highest scores)	San Joaquin	2856	20.1	72.93	6.97	75.18	2.77	16.98	0	2.38	2.7
6077002202	44.00	80.79	80-85%	San Joaquin	5079	18.84	73.03	8.13	76.67	2.89	11.81	0	8.03	0.59
6077002300	63.16	97.16	95-100% (highest scores)	San Joaquin	4334	17.7	72.5	9.81	79.72	3.23	4.29	0	10.38	2.38
6077002401	61.16	96.29	95-100% (highest scores)	San Joaquin	5328	20.89	70.98	8.13	70.44	7.94	2.91	0	14.36	4.35

6077002402	62.75	96.97	95-100% (highest scores)	San Joaquin	1663	11.3	68.97	19.72	74.26	4.45	10.34	0	9.5	1.44
6077002503	49.07	86.80	85-90%	San Joaquin	2258	17.8	72.45	9.74	41.76	9.34	22.41	0	18.16	8.33
6077002504	38.31	72.60	70-75%	San Joaquin	3884	11.05	80.66	8.29	42.64	10.97	15.11	0	29.87	1.42
6077002701	55.66	92.99	90-95%	San Joaquin	6246	18.32	74.93	6.76	77.11	18.56	2.11	0.13	2.1	0
6077002702	42.03	78.11	75-80%	San Joaquin	3726	13.69	73.83	12.48	84.68	13.2	0	0.89	0.27	0.97
6077002800	50.55	88.44	85-90%	San Joaquin	6097	12.84	80.3	6.86	68.51	8.4	15.09	0	7.46	0.54
6077003106	34.97	67.50	65-70%	San Joaquin	4100	10.51	65.29	24.2	27.63	50.32	5.07	0	12.1	4.88
6077003108	29.60	58.02	55-60%	San Joaquin	4599	18.42	67.28	14.31	30.55	40.18	14.57	0	9.05	5.65
6077003109	40.71	76.20	75-80%	San Joaquin	6120	13.97	69.61	16.42	44.8	37.21	8.43	0	5.29	4.26
6077003110	37.61	71.47	70-75%	San Joaquin	4103	18.52	68.97	12.5	38.68	35.61	12.31	0	8.26	5.14
6077003111	38.09	72.30	70-75%	San Joaquin	3930	14.78	66.87	18.35	39.08	28.73	12.52	0	15.42	4.25
6077003112	27.82	54.55	50-55%	San Joaquin	3214	14.22	62.1	23.68	28.53	42.31	8.09	0	17.21	3.86
6077003113	51.78	89.76	85-90%	San Joaquin	6844	15.6	74.12	10.27	36.54	20.11	17.01	0.86	22.55	2.94
6077003114	17.22	30.85	30-35%	San Joaquin	9923	13.8	70.91	15.3	22.1	47.07	7.31	0	21.61	1.91
6077003203	32.15	62.70	60-65%	San Joaquin	3669	8.5	65.77	25.73	27.04	54.78	5.72	0.16	6.35	5.94
6077003205	30.31	59.30	55-60%	San Joaquin	4325	18.36	69.23	12.42	34.15	39.03	3.51	0	16.49	6.82
6077003208	25.50	49.85	45-50%	San Joaquin	13561	14.78	72.53	12.69	29.56	23.2	8.37	0	35.38	3.5
6077003209	17.82	32.29	30-35%	San Joaquin	4139	11.86	70.89	17.25	33.34	36.1	7.76	0	16.5	6.31
6077003210	22.95	44.38	40-45%	San Joaquin	2816	7.32	59.06	33.63	40.31	36.9	4.44	3.27	11.54	3.55
6077003213	30.62	59.90	55-60%	San Joaquin	5185	14.7	68.76	16.55	29.18	32.75	10.36	0.5	17.72	9.49
6077003214	24.18	47.11	45-50%	San Joaquin	3266	12.52	72.01	15.46	30.47	40.39	10.38	1.01	13.93	3.83
6077003215	24.88	48.50	45-50%	San Joaquin	4248	15.63	71.7	12.66	27.52	34.96	19.63	0	11.79	6.1
6077003216	34.06	65.94	65-70%	San Joaquin	3324	15.52	71.45	13.03	38.12	27.38	12.09	0.12	12.79	9.51
6077003217	34.86	67.33	65-70%	San Joaquin	3749	17.26	73.89	8.86	40.86	13.98	15.87	0	23.45	5.84
6077003305	44.58	81.48	80-85%	San Joaquin	4375	14.83	64.69	20.48	40.69	38.13	5.55	0.3	10.56	4.78
6077003306	36.75	70.18	70-75%	San Joaquin	4993	13.8	75.77	10.43	43.6	17.1	13.24	0.44	23.19	2.42
6077003307	39.01	73.49	70-75%	San Joaquin	5225	17.03	68.69	14.28	44.75	22.79	7.79	0	21.8	2.87
6077003308	34.72	67.12	65-70%	San Joaquin	1873	9.66	75.39	14.95	43.78	19.91	5.5	0	20.88	9.93
6077003310	34.28	66.34	65-70%	San Joaquin	4938	19.66	66.59	13.75	39.75	18.61	13.95	0.43	22.68	4.58
6077003311	39.18	73.78	70-75%	San Joaquin	3838	18.97	72.75	8.29	49.61	17.07	11.57	0	16.34	5.42
6077003312	35.67	68.66	65-70%	San Joaquin	3083	21.05	71.65	7.3	44.76	8.89	24.29	0.39	17.84	3.83
6077003313	33.81	65.54	65-70%	San Joaquin	2895	20.31	68.19	11.5	39.1	5.18	26.91	0	24.11	4.7
6077003403	36.11	69.35	65-70%	San Joaquin	4800	11.67	80.81	7.52	30.23	13.21	10.13	0.06	43.5	2.88
6077003404	31.65	61.70	60-65%	San Joaquin	6374	15.88	69.8	14.32	36.46	15.96	14.39	0	31.88	1.32
6077003405	39.71	74.56	70-75%	San Joaquin	4507	11.47	76.53	12	32.02	10.41	5.13	0	44.82	7.63
6077003406	37.77	71.68	70-75%	San Joaquin	3938	15.13	69.48	15.39	27.43	11.63	23.34	0	32.12	5.49
6077003407	39.69	74.48	70-75%	San Joaquin	2671	19.02	69	11.98	40.77	17.78	19.81	0	19.84	1.8
6077003409	35.42	68.23	65-70%	San Joaquin	4159	14.19	75.14	10.68	38.13	13.25	6.52	0	37.94	4.16
6077003410	32.03	62.47	60-65%	San Joaquin	6284	15.29	75.27	9.44	31.05	10.33	12.3	0.32	38.81	7.19
6077003500	36.12	69.39	65-70%	San Joaquin	23978	15.78	72.92	11.3	28.88	23.64	6.65	0.22	36.96	3.66
6077003601	34.47	66.62	65-70%	San Joaquin	3281	9.88	62.08	28.04	41.3	48.28	0.55	0	9.57	0.3
6077003602	26.84	52.72	50-55%	San Joaquin	3429	15.34	68.12	16.54	63.9	32.9	0.03	0.09	1.25	1.84
6077003700	56.55	93.65	90-95%	San Joaquin	3154	18.67	72.45	8.88	72.13	20.55	4.06	0	0.63	2.63
6077003801	38.40	72.81	70-75%	San Joaquin	12573	14.98	74.46	10.55	45.3	9.63	12.17	0	24.12	8.78
6077003802	57.84	94.44	90-95%	San Joaquin	6955	13.6	76.74	9.66	50.28	12.14	16.15	0.23	17.9	3.31
6077003803	70.42	99.17	95-100% (highest scores)	San Joaquin	6299	8.67	81.68	9.65	58.76	17.67	11.49	0.81	9.22	2.05
6077003900	56.35	93.47	90-95%	San Joaquin	1518	15.42	71.21	13.37	69.76	28.99	0	0.53	0.72	0
6077004001	44.21	81.10	80-85%	San Joaquin	2215	12.37	69.93	17.7	53.45	40.09	0.95	0	4.24	1.26
6077004002	23.43	45.44	45-50%	San Joaquin	11749	14.64	75.23	10.13	21.61	30.65	8.06	0	32.02	7.66
6077004102	37.82	71.81	70-75%	San Joaquin	9919	14.3	69.55	16.15	29.17	22.82	4.06	1.28	40.92	1.74
6077004104	9.77	12.39	10-15%	San Joaquin	3638	11.49	70.62	17.89	12.56	77.9	0.58	0	4.78	4.18
6077004105	19.16	35.54	35-40%	San Joaquin	4762	10.69	68.42	20.89	19.93	65.92	3.4	1.03	3.49	6.24
6077004106	27.42	53.79	50-55%	San Joaquin	1604	9.79	67.27	22.94	25.19	70.64	0	0.37	3.49	0.31
6077004201	17.27	30.99	30-35%	San Joaquin	6505	12.24	68.44	19.32	27.27	66.61	0.02	0	3.35	2.75
6077004202	13.49	21.65	20-25%	San Joaquin	1660	6.81	59.52	33.67	11.57	74.52	1.39	0	8.73	3.8
6077004203	37.81	71.79	70-75%	San Joaquin	4068	12.32	73.65	14.04	39.7	47.64	0.54	0.47	9.54	2.11
6077004204	32.97	63.98	60-65%	San Joaquin	2924	9.2	71.1	19.7	27.22	70.18	0	0.27	1.67	0.65
6077004302	38.85	73.27	70-75%	San Joaquin	6399	15.64	69.56	14.8	38.02	53.59	1.25	0	6.36	0.78

6077004303	13.96	22.87	20-25%	San Joaquin	4735	9.93	64.63	25.45	19.39	72.14	0.99	0.21	3.82	3.44
6077004305	14.64	24.63	20-25%	San Joaquin	6320	11.52	76.8	11.68	27.94	46.34	6.11	0	16.76	2.85
6077004307	19.75	36.88	35-40%	San Joaquin	3961	20.22	65.46	14.31	25.3	59.33	2.55	0	9.82	3
6077004308	34.40	66.53	65-70%	San Joaquin	4402	16.63	74.1	9.27	60.25	25.97	0	0.3	12.99	0.5
6077004402	30.09	58.85	55-60%	San Joaquin	5541	13.23	77.33	9.44	39.38	39.36	1.08	0.2	13.26	6.71
6077004403	43.31	79.92	75-80%	San Joaquin	3798	20.7	71.88	7.42	60.14	15.61	0	0	23.33	0.92
6077004404	51.46	89.41	85-90%	San Joaquin	4131	22.71	70.1	7.19	58.02	17.99	1.19	0	19.53	3.27
6077004501	48.45	86.07	85-90%	San Joaquin	2377	19.35	61.72	18.93	30.63	50.74	2.99	0	13	2.65
6077004502	58.46	94.73	90-95%	San Joaquin	4301	22.32	73.12	4.56	79.66	9.72	5.6	0	5.02	0
6077004600	27.36	53.68	50-55%	San Joaquin	6061	11.17	66.54	22.29	35.59	59.59	0.35	0.38	2.26	1.83
6077004701	34.26	66.33	65-70%	San Joaquin	2902	15.71	67.23	17.06	34.22	62.72	0.1	0	0.41	2.55
6077004703	17.73	32.10	30-35%	San Joaquin	3753	8.77	69.09	22.14	29.92	62.7	0	0.4	4.21	2.77
6077004704	22.39	43.00	40-45%	San Joaquin	4621	11.34	66.59	22.07	34.41	62.22	1.17	0.22	1.15	0.84
6077004800	22.97	44.42	40-45%	San Joaquin	5944	13.44	71	15.56	46.67	48.62	0.81	0.24	2.47	1.19
6077004901	29.49	57.80	55-60%	San Joaquin	7838	15.97	69.83	14.2	23.37	73.85	0.52	0	0.45	1.8
6077004902	30.38	59.39	55-60%	San Joaquin	5541	17	65.39	17.61	25.25	71.61	0.07	0.52	2.11	0.43
6077005001	25.84	50.71	50-55%	San Joaquin	5927	13.53	65.31	21.16	32.9	63.4	0.39	0	0.78	2.53
6077005003	26.61	52.23	50-55%	San Joaquin	5947	13.35	71.13	15.52	27.09	64.97	0.2	0.08	4.02	3.63
6077005004	25.10	48.92	45-50%	San Joaquin	5993	13.58	74.85	11.56	29.28	65.38	0.53	0	1.97	2.84
6077005106	38.91	73.32	70-75%	San Joaquin	8926	15.58	74.11	10.31	30.44	38.56	4.91	0.37	18.82	6.9
6077005108	35.01	67.61	65-70%	San Joaquin	5012	14.31	79.03	6.66	61.59	28.79	1.98	0.46	1.82	5.37
6077005109	53.31	91.14	90-95%	San Joaquin	4209	16.73	69.59	13.68	56.81	33.59	1.43	0.52	3.4	4.25
6077005110	50.97	88.83	85-90%	San Joaquin	6885	15.29	70.31	14.39	44.63	51.18	1.07	0.38	1.22	1.51
6077005113	40.89	76.44	75-80%	San Joaquin	6353	13.93	68.47	17.6	33.61	49.71	4.01	0	7.13	5.54
6077005114	38.32	72.67	70-75%	San Joaquin	10238	18.26	75.14	6.6	34.75	30.16	6.73	1.81	19.53	7.02
6077005119	48.05	85.56	85-90%	San Joaquin	8947	18.32	74.46	7.22	30.77	16.96	9.17	0	39.11	4
6077005122	42.78	79.14	75-80%	San Joaquin	6635	11.73	78.51	9.77	30.75	36.97	4.19	0.51	23.67	3.9
6077005123	29.80	58.31	55-60%	San Joaquin	4720	16.04	70.83	13.14	39	38.03	3.69	0	15.76	3.52
6077005124	25.14	49.03	45-50%	San Joaquin	3474	13.41	70.29	16.29	42.83	41.42	3.97	0	8.72	3.05
6077005125	21.96	42.06	40-45%	San Joaquin	1916	14.87	69.83	15.29	46.82	39.72	3.03	1.46	6.05	2.92
6077005126	39.91	74.86	70-75%	San Joaquin	3882	13.11	72.69	14.19	42.19	43.3	3.07	0.52	3.86	7.06
6077005127	43.61	80.26	80-85%	San Joaquin	6089	14.37	78.57	7.06	42.42	17.13	7.87	0	27.28	5.3
6077005129	52.13	90.15	90-95%	San Joaquin	3437	12.89	75.21	11.9	61.04	23.19	0.55	0	12.69	2.53
6077005130	39.96	74.91	70-75%	San Joaquin	3064	15.11	73.86	11.03	58.84	27.51	0.46	0.36	11.23	1.6
6077005131	56.42	93.53	90-95%	San Joaquin	7055	8.21	76.31	15.48	40.84	43.35	10.89	0.77	2.18	1.98
6077005132	42.78	79.16	75-80%	San Joaquin	3141	13.02	75.01	11.97	45.3	45.81	2.36	0.41	5.51	0.6
6077005133	46.80	84.15	80-85%	San Joaquin	4439	16.49	72.99	10.52	56.63	30.84	2.95	0	4.22	5.36
6077005134	26.31	51.48	50-55%	San Joaquin	4970	11.45	75.94	12.62	32.25	45.31	12.66	0.04	4.73	5.01
6077005135	33.39	64.78	60-65%	San Joaquin	8321	13.82	60.88	25.3	30.66	51.18	5.64	0.1	6.87	5.56
6077005202	38.08	72.28	70-75%	San Joaquin	8606	9.78	80.65	9.56	33.86	37.68	4.78	0.08	14.69	8.91
6077005206	29.48	57.77	55-60%	San Joaquin	26742	20.01	73.48	6.51	19.67	31.74	7.15	0	35.91	5.54
6077005207	22.53	43.33	40-45%	San Joaquin	14686	9.41	80.57	10.02	27.02	27.48	4.38	0	33.52	7.61
6077005208	16.85	30.09	30-35%	San Joaquin	6652	11.76	78.34	9.91	31.37	37.84	6.67	0	20.22	3.89
6077005209	16.16	28.34	25-30%	San Joaquin	7415	14.82	77.45	7.73	31.07	37.45	5.76	0.08	15.9	9.74
6077005210	13.32	21.26	20-25%	San Joaquin	12302	12.66	80.51	6.83	32.28	32.21	7.5	0	23.34	4.67
6077005302	42.39	78.56	75-80%	San Joaquin	7395	17.35	73.74	8.91	52.6	30.85	1.97	0	8.13	6.45
6077005303	31.31	61.20	60-65%	San Joaquin	4870	18.95	70.76	10.29	60.02	29.1	3.74	0.04	5.23	1.87
6077005305	34.37	66.50	65-70%	San Joaquin	7083	14.17	74.52	11.31	50.11	34.24	4.12	0.31	5.52	5.7
6077005307	31.13	60.89	60-65%	San Joaquin	3352	14.08	75.18	10.74	44.84	31.83	2.8	0.12	14.23	6.18
6077005308	27.28	53.57	50-55%	San Joaquin	4818	13.39	73.64	12.97	44.44	37.96	1.54	0.15	12.39	3.53
6077005403	22.44	43.14	40-45%	San Joaquin	6313	13.84	75.78	10.38	49.23	33.34	3.2	0	7.16	7.06
6077005405	28.41	55.75	55-60%	San Joaquin	3630	13.99	78.15	7.85	56.53	27.66	1.38	0.3	11.6	2.53
6077005406	33.50	64.96	60-65%	San Joaquin	3495	15.59	75.77	8.64	61.86	21.75	2.26	0.43	7.38	6.32
6077005501	27.93	54.80	50-55%	San Joaquin	4129	3.63	85.27	11.09	30.93	39.19	17.99	2.06	4.75	5.09
6077005502	27.96	54.88	50-55%	San Joaquin	1981	14.89	71.98	13.12	43.92	42.4	1.77	0	5.7	6.21
6079010002	8.96	10.54	10-15%	San Luis Obispo	4621	11.73	72.99	15.28	16.45	70.83	5.76	0.45	1.41	5.11
6079010016	21.56	41.20	40-45%	San Luis Obispo	5029	11.67	72.88	15.45	40.8	54.52	0	0.54	1.27	2.86
6079010101	7.63	7.96	5-10%	San Luis Obispo	1669	8.69	72.92	18.39	19.17	76.99	0.24	0	2.04	1.56

6079010102	24.21	47.16	45-50%	San Luis Obispo	6937	11	77.53	11.47	56.71	37.73	3.78	0	1.23	0.56
6079010201	15.69	27.08	25-30%	San Luis Obispo	7491	13.15	66.03	20.82	23.56	71.53	0.25	0.73	2.1	1.83
6079010202	18.86	34.88	30-35%	San Luis Obispo	5178	10.49	67.83	21.69	35.42	60.64	1.04	0.04	1.27	1.58
6079010204	12.50	19.23	15-20%	San Luis Obispo	6712	10.52	75.39	14.09	40.05	54.84	0.06	0	2.34	2.71
6079010205	10.44	13.96	10-15%	San Luis Obispo	4653	14.14	71.37	14.49	36.56	60.71	0.21	0.47	1.5	0.54
6079010300	15.61	26.92	25-30%	San Luis Obispo	9434	8.6	72.23	19.18	22.34	73.92	0.16	1.45	0.64	1.47
6079010403	5.45	3.76	1-5% (lowest scores)	San Luis Obispo	3444	4.15	54.47	41.38	15.45	81.21	0.55	0	2.79	0
6079010404	6.31	5.35	5-10%	San Luis Obispo	2203	4.49	55.06	40.44	28.33	67.41	0.64	0	3	0.64
6079010503	16.21	28.44	25-30%	San Luis Obispo	5429	5.56	65.02	29.42	10.31	81.75	2.3	0	2.58	3.06
6079010504	8.36	9.34	5-10%	San Luis Obispo	2630	6.12	57.72	36.16	10.27	84.87	0	0	1.63	3.23
6079010602	15.73	27.19	25-30%	San Luis Obispo	3713	6.63	59.41	33.96	10.18	79.13	0	3.12	4.58	2.99
6079010603	23.69	45.85	45-50%	San Luis Obispo	1513	9.32	61.34	29.35	16.13	77.53	0.66	0.46	3.04	2.18
6079010701	7.24	7.19	5-10%	San Luis Obispo	5437	11.81	68.44	19.75	18.04	72.72	0.31	1.43	5.76	1.73
6079010703	15.93	27.63	25-30%	San Luis Obispo	3672	13.04	66.8	20.15	21.65	63.75	0.38	0.3	4.93	8.99
6079010707	7.29	7.27	5-10%	San Luis Obispo	6720	8.14	58.01	33.85	12.16	83.76	0	0.42	2.81	0.85
6079010901	18.13	32.99	30-35%	San Luis Obispo	10885	0.3	99.6	0.09	13.56	62.25	2.15	0.47	17.01	4.56
6079010902	11.78	17.26	15-20%	San Luis Obispo	4098	1.54	93.85	4.61	18.23	68.64	4.44	0	5.61	3.07
6079011001	7.87	8.26	5-10%	San Luis Obispo	5006	10.35	67.92	21.73	21.89	65.16	3.52	0	4.45	4.97
6079011002	14.15	23.41	20-25%	San Luis Obispo	3409	6.42	79.5	14.08	16.08	80.79	1	0	1.35	0.79
6079011101	22.16	42.45	40-45%	San Luis Obispo	3575	5.62	85.2	9.17	18.43	66.49	4.87	0	5.82	4.39
6079011102	16.14	28.30	25-30%	San Luis Obispo	5784	6.88	81.38	11.74	16.91	74.22	0.55	0.61	5.33	2.39
6079011103	27.49	53.93	50-55%	San Luis Obispo	2973	10.66	66.36	22.97	32.76	60.75	2.12	0.27	3.36	0.74
6079011200	17.97	32.61	30-35%	San Luis Obispo	8150	3.8	82.53	13.67	10.34	78.71	0.93	0.36	4.96	4.7
6079011300	13.13	20.78	20-25%	San Luis Obispo	7298	11.95	72.35	15.7	21.94	62.35	1.92	0.88	8.26	4.66
6079011400	NA	NA	NA	San Luis Obispo	3075	0	93.56	6.44	22.67	18.31	47.35	2.02	4.94	4.72
6079011501	19.96	37.46	35-40%	San Luis Obispo	1819	10.72	73.89	15.39	27.87	55.63	1.21	0.6	8.08	6.6
6079011503	13.11	20.76	20-25%	San Luis Obispo	3375	12	73.16	14.84	14.34	81.6	0.41	0	3.32	0.33
6079011504	6.11	4.94	1-5% (lowest scores)	San Luis Obispo	1958	2.35	88.41	9.24	21.09	67.62	4.14	0.26	3.52	3.37
6079011600	13.82	22.49	20-25%	San Luis Obispo	3908	6.91	58.16	34.93	12.38	82.42	0	0	3.48	1.71
6079011701	6.96	6.71	5-10%	San Luis Obispo	4432	6.16	53.88	39.96	12.79	79.24	4.47	0	2.5	0.99
6079011704	8.44	9.48	5-10%	San Luis Obispo	3729	4.85	68.97	26.17	11.48	82.03	0.83	0.7	0.86	4.1
6079011800	10.86	15.14	15-20%	San Luis Obispo	7469	9.45	65.99	24.55	9.25	84.34	0.08	0.51	3.92	1.9
6079011901	9.81	12.47	10-15%	San Luis Obispo	3270	7.77	61.71	30.52	17	79.14	0	0	3.24	0.61
6079011902	13.04	20.60	20-25%	San Luis Obispo	8589	11.13	70.38	18.49	20	67.3	1.93	1.29	5.41	4.06
6079012000	14.86	25.16	25-30%	San Luis Obispo	7700	13.87	71.09	15.04	30.78	62.92	1.92	0.21	1.75	2.42
6079012102	19.47	36.11	35-40%	San Luis Obispo	5835	17.33	63.84	18.83	32.37	57.29	1.25	0.5	7.18	1.41
6079012200	24.64	48.05	45-50%	San Luis Obispo	7033	12.64	68.95	18.41	42.56	46.88	1.09	0	6.75	2.72
6079012302	6.79	6.38	5-10%	San Luis Obispo	5686	11.92	62.63	25.45	9.6	84.47	1.76	0.32	1.6	2.25
6079012304	17.24	30.89	30-35%	San Luis Obispo	10975	8.38	60.28	31.33	20.96	70.82	0.15	1.05	2.1	4.93
6079012401	27.27	53.53	50-55%	San Luis Obispo	6720	8.02	78.38	13.6	56.86	37.32	0.88	0	2.44	2.5
6079012402	18.05	32.84	30-35%	San Luis Obispo	10049	10.7	70.6	18.7	37.61	55.55	1.18	0.13	3.83	1.7
6079012502	10.71	14.71	10-15%	San Luis Obispo	5572	14.39	76.53	9.08	25.32	70.32	0.27	0	0.27	3.82
6079012503	12.63	19.47	15-20%	San Luis Obispo	6689	15.52	71.94	12.54	25.06	64.76	1.15	0.52	4.11	4.4
6079012505	6.43	5.61	5-10%	San Luis Obispo	4884	11.83	72.73	15.44	14.52	79.73	0.61	0.51	1.47	3.15
6079012600	8.89	10.48	10-15%	San Luis Obispo	7956	10.58	71.23	18.19	17.24	78.83	0.18	0	0.73	3.02
6079012702	8.29	9.14	5-10%	San Luis Obispo	6793	10.81	68.41	20.79	8.92	86.16	1.78	0.32	1.94	0.87
6079012704	6.64	5.98	5-10%	San Luis Obispo	9131	10.45	64.68	24.87	9.87	85.51	0.18	1.4	0.76	2.29
6079012800	NA	NA	NA	San Luis Obispo	234	0	98.29	1.71	18.38	41.88	35.9	0	0	3.85
6079012900	10.27	13.67	10-15%	San Luis Obispo	4880	14.86	67.68	17.46	13.67	82.15	0.78	3.38	0	0.02
6079013000	9.80	12.44	10-15%	San Luis Obispo	2741	13.32	58.74	27.95	22.66	73	0.15	0	4.12	0.07
6081600100	28.00	54.97	50-55%	San Mateo	5051	13.23	68.56	18.21	17.07	42.41	2.59	0	33.12	4.81
6081600200	33.58	65.13	65-70%	San Mateo	4279	9.39	74.27	16.34	27.51	3.11	2.45	0	63.66	3.27
6081600300	12.57	19.34	15-20%	San Mateo	4100	4.68	75.17	20.15	16.88	17.34	3.76	0	58.51	3.51
6081600401	12.59	19.39	15-20%	San Mateo	3115	10.53	68.15	21.32	14	11.27	1.8	0	66.58	6.36
6081600402	22.19	42.52	40-45%	San Mateo	5068	6.02	75.67	18.31	28.91	7.18	2.43	0	59.1	2.39
6081600500	22.71	43.78	40-45%	San Mateo	8445	7.37	74.39	18.25	37.18	7.27	0	0.32	53.85	1.37
6081600600	35.79	68.85	65-70%	San Mateo	5637	7.75	77.01	15.24	45.66	4.1	1.65	0	45.88	2.71
6081600700	27.36	53.69	50-55%	San Mateo	7466	7.63	75.57	16.8	30.66	8.84	3.56	0.23	55.02	1.69

6081600800	34.33	66.40	65-70%	San Mateo	7804	8.71	85.03	6.25	21.82	11.43	8.84	0	52.87	5.04
6081600900	21.79	41.75	40-45%	San Mateo	3965	8.15	68.45	23.4	6.71	36.34	0.25	0	51.85	4.84
6081601000	24.04	46.85	45-50%	San Mateo	7094	10.47	73.5	16.03	17.71	15.99	6.74	0.17	56.1	3.3
6081601100	20.73	39.32	35-40%	San Mateo	6406	12.97	69.84	17.19	13.77	16.22	5.51	0.16	60.35	4
6081601200	29.68	58.09	55-60%	San Mateo	6940	9.35	76.6	14.05	26.9	20.22	0.56	0	49.35	2.97
6081601300	32.62	63.48	60-65%	San Mateo	8524	13.06	73.74	13.2	37.41	5.9	2.9	0.09	49.52	4.18
6081601400	30.15	59.00	55-60%	San Mateo	7059	7.28	74.42	18.3	15.27	15.84	0.34	0	65.94	2.61
6081601501	21.45	41.02	40-45%	San Mateo	5256	6.05	73.82	20.13	9.99	9.87	1.14	1.05	76.41	1.54
6081601502	24.92	48.56	45-50%	San Mateo	5685	8.58	73	18.42	23.73	10.38	5.75	0	58.58	1.57
6081601601	18.44	33.77	30-35%	San Mateo	2810	8.86	74.27	16.87	34.16	20.93	1.89	0	39	4.02
6081601603	20.61	39.11	35-40%	San Mateo	6009	7.26	69.66	23.08	12.51	14.01	3.39	0	68.57	1.51
6081601604	14.62	24.60	20-25%	San Mateo	2513	3.26	86.59	10.15	9.11	29.65	6.69	0	48.51	6.05
6081601605	20.87	39.74	35-40%	San Mateo	6310	7.99	69.81	22.2	13.19	8.23	0.95	0	72.68	4.96
6081601700	19.11	35.43	35-40%	San Mateo	4335	11.44	72.66	15.89	24.71	32.46	0.76	0	40.05	2.03
6081601800	17.98	32.72	30-35%	San Mateo	6697	11.05	71.66	17.29	20.88	28.22	1.22	0	46.32	3.36
6081601901	20.19	37.95	35-40%	San Mateo	4363	7.56	76.78	15.65	38.02	21.09	0.37	0	38.14	2.38
6081601902	20.33	38.30	35-40%	San Mateo	5604	6.78	81.76	11.46	27.11	25.61	0.82	0	44.93	1.53
6081602000	28.02	55.02	55-60%	San Mateo	8593	7.01	74.17	18.83	39.57	15.93	0.21	0	41.87	2.42
6081602100	47.38	84.87	80-85%	San Mateo	3700	13.51	75.3	11.19	59.59	11.7	3.73	0.19	22.94	1.84
6081602200	39.97	74.95	70-75%	San Mateo	8444	13.81	75.25	10.94	62.07	14.83	1.99	0	17.39	3.73
6081602300	46.09	83.33	80-85%	San Mateo	4196	11.73	73.05	15.23	57.32	9.96	3.48	0.24	26.93	2.07
6081602400	32.19	62.75	60-65%	San Mateo	7554	9.24	72.03	18.73	26.05	35.77	1.23	0	28.79	8.15
6081602500	13.63	22.01	20-25%	San Mateo	5143	7.39	70.35	22.26	12.31	15.46	5.25	0	62.8	4.18
6081602600	11.74	17.20	15-20%	San Mateo	8489	8.13	74.36	17.52	11.31	9.55	2.05	0.52	72.56	4.02
6081602700	12.54	19.26	15-20%	San Mateo	6464	12.04	75.56	12.41	18.47	24.33	3.2	0	48.77	5.23
6081602800	13.77	22.42	20-25%	San Mateo	4902	11.77	70.75	17.48	24.68	31.64	3.73	0	36.52	3.43
6081602900	13.03	20.59	20-25%	San Mateo	3775	7.76	77.35	14.89	18.25	49.51	3.92	0	21.88	6.44
6081603000	12.36	18.91	15-20%	San Mateo	4371	9.47	75.18	15.35	14.71	62.82	2.1	0.89	12.27	7.21
6081603100	9.20	11.06	10-15%	San Mateo	3388	12.93	71.13	15.94	19.16	62.46	2.36	0.03	9.95	6.05
6081603200	8.87	10.41	10-15%	San Mateo	3760	12.61	71.6	15.8	16.3	71.17	0.77	0	8.22	3.54
6081603300	7.52	7.73	5-10%	San Mateo	6395	8.93	71.24	19.83	15.95	63.92	2.44	0	13.37	4.32
6081603400	6.34	5.41	5-10%	San Mateo	5929	11.6	65.46	22.94	21.77	61.36	0	0.34	11.2	5.33
6081603700	16.17	28.37	25-30%	San Mateo	5819	9.8	72.68	17.53	19.33	32.5	1.22	0.29	38.13	8.52
6081603801	14.12	23.34	20-25%	San Mateo	2384	8.6	75.42	15.98	15.44	28.98	0.08	0	49.41	6.08
6081603802	16.33	28.64	25-30%	San Mateo	5083	11.21	67.91	20.87	17.63	47.57	0.71	0	28.45	5.65
6081603900	12.98	20.49	20-25%	San Mateo	5586	7.5	78.34	14.16	21.14	50.16	2.01	0.3	25.94	0.45
6081604000	16.25	28.50	25-30%	San Mateo	3326	14.34	72.67	12.99	25.92	45.91	0	0	25.68	2.5
6081604101	40.95	76.56	75-80%	San Mateo	8053	10.75	77.45	11.8	43.31	19.55	0.21	0	33.09	3.84
6081604102	26.79	52.60	50-55%	San Mateo	3020	7.42	77.45	15.13	12.19	31.23	3.18	0	46.86	6.56
6081604200	34.57	66.84	65-70%	San Mateo	4135	13.45	76.44	10.11	49.26	18.23	1.06	0.15	19.49	11.8
6081604400	24.37	47.57	45-50%	San Mateo	5271	12.73	73.38	13.89	18.95	27.85	0.93	0.02	45.02	7.23
6081604500	11.00	15.47	15-20%	San Mateo	3811	11.68	67.73	20.6	10	41.22	1.15	0	41.69	5.93
6081604600	9.55	11.81	10-15%	San Mateo	2722	10.14	68.96	20.9	3.45	38.68	0.33	0.15	50.99	6.39
6081604700	9.68	12.20	10-15%	San Mateo	2781	8.95	68.86	22.19	8.27	38.58	0.18	0.5	48.51	3.96
6081604800	15.30	26.19	25-30%	San Mateo	5028	8.73	73.75	17.52	10.9	33.97	0.58	0	50.48	4.08
6081604900	12.10	18.24	15-20%	San Mateo	3012	11.62	63.98	24.4	10.56	26.1	0.1	0.07	60.23	2.95
6081605000	12.56	19.31	15-20%	San Mateo	8376	13.35	67.29	19.36	6.89	43.06	2.08	0	41.07	6.9
6081605100	22.32	42.80	40-45%	San Mateo	3181	13.33	74	12.67	12.7	56.46	1.29	0	23.04	6.51
6081605200	11.12	15.72	15-20%	San Mateo	3494	17.89	66	16.11	4.75	66.74	0.03	0	23.84	4.64
6081605300	14.37	24.00	20-25%	San Mateo	4651	12.84	70.93	16.23	13.18	54.07	0.77	0	25.48	6.49
6081605400	13.27	21.19	20-25%	San Mateo	6142	11.22	78.77	10.01	17.88	55.88	0.36	0	20.97	4.92
6081605500	11.38	16.34	15-20%	San Mateo	5469	8.94	78.17	12.89	19.22	52.68	1.7	0	23.19	3.22
6081605600	5.19	3.33	1-5% (lowest scores)	San Mateo	6099	12.48	63.99	23.53	4.75	55.25	0	0	32.92	7.07
6081605700	3.78	1.17	1-5% (lowest scores)	San Mateo	5348	10.06	69.93	20.01	3.29	58.56	2.32	0	30.27	5.55
6081605800	3.80	1.19	1-5% (lowest scores)	San Mateo	2572	8.71	67.5	23.79	6.61	72.36	0	0	17.73	3.3
6081605900	21.34	40.66	40-45%	San Mateo	5880	11.17	74.71	14.12	27.91	40.58	1.16	0.29	22.7	7.36
6081606000	32.62	63.46	60-65%	San Mateo	5162	17.57	72.45	9.98	43.14	33.67	3.82	0	15.38	3.99
6081606100	29.99	58.64	55-60%	San Mateo	5378	21.68	68.5	9.82	47.69	22.63	1.54	0	25.53	2.6

6081606200	42.22	78.34	75-80%	San Mateo	7788	15.22	73.09	11.7	54.38	13.75	5.95	0.51	20.4	5.01
6081606300	24.60	47.96	45-50%	San Mateo	4110	11.02	62.9	26.08	24.16	43.7	2.6	0.36	25.57	3.6
6081606400	9.72	12.28	10-15%	San Mateo	5134	9.43	67.45	23.12	12.31	56.41	0.31	0	24.87	6.1
6081606500	9.48	11.66	10-15%	San Mateo	3501	16.62	64.72	18.65	8.05	66.21	1.14	0	17.74	6.86
6081606600	19.30	35.79	35-40%	San Mateo	3723	14.83	72.84	12.33	21.81	51.14	0.11	0	18.48	8.46
6081606700	6.10	4.90	1-5% (lowest scores)	San Mateo	2455	13.65	64.24	22.12	4.6	62.08	0	0	25.99	7.33
6081606800	5.18	3.32	1-5% (lowest scores)	San Mateo	3535	9.5	73.41	17.09	1.67	56.94	1.19	0	37.09	3.11
6081606900	4.44	2.16	1-5% (lowest scores)	San Mateo	2898	10.42	71.36	18.22	8.9	52.1	2.48	0	30.05	6.45
6081607000	5.80	4.30	1-5% (lowest scores)	San Mateo	3588	10.54	67.34	22.13	7.44	51.56	1.03	3.76	28.71	7.5
6081607100	9.40	11.40	10-15%	San Mateo	3111	17.9	65.19	16.91	3.76	60.72	0.77	0	26.74	8
6081607200	16.90	30.24	30-35%	San Mateo	4089	8.34	71.7	19.96	28.03	40.03	1.12	0.15	28.63	2.03
6081607300	8.34	9.20	5-10%	San Mateo	3642	12.58	69.82	17.6	12.66	57.96	0	0	22.6	6.78
6081607400	19.38	35.91	35-40%	San Mateo	4870	12.55	69.22	18.23	21.81	44.33	1.03	0	25.22	7.62
6081607500	17.39	31.24	30-35%	San Mateo	6150	14.26	78.34	7.4	23.84	31.19	3.46	0	36.47	5.04
6081607600	21.12	40.20	40-45%	San Mateo	3611	15.84	71.14	13.02	23.87	45.25	1.88	0	25.92	3.07
6081607701	31.86	62.12	60-65%	San Mateo	4396	10.65	79.21	10.15	37.44	24.77	0.61	0.45	33.03	3.69
6081607702	25.11	48.93	45-50%	San Mateo	3324	11.7	74.22	14.08	33.51	23.5	3.07	0.21	29.99	9.72
6081607800	16.75	29.83	25-30%	San Mateo	3380	11.01	71.95	17.04	19.88	41.33	1.86	0	30.54	6.39
6081607900	12.91	20.26	20-25%	San Mateo	2988	7.16	66.5	26.34	6.89	56.36	2.38	0	30.25	4.12
6081608001	9.55	11.83	10-15%	San Mateo	3818	12.96	72.26	14.77	6.57	41.28	1.86	0.29	45.28	4.71
6081608002	11.31	16.17	15-20%	San Mateo	3640	11.9	65.36	22.75	7.14	42.88	2.66	0.52	40.99	5.8
6081608004	16.73	29.72	25-30%	San Mateo	8738	14.71	71.15	14.15	11.18	32.24	1.14	0	50.76	4.68
6081608013	7.01	6.80	5-10%	San Mateo	4011	14.16	72.97	12.86	6.43	40.79	2.72	0	47.59	2.47
6081608023	13.39	21.41	20-25%	San Mateo	2598	10.82	67.05	22.13	7.51	33.45	2.19	0.08	53.43	3.35
6081608100	8.47	9.57	5-10%	San Mateo	3775	15.42	66.62	17.96	4.66	38.15	4.66	0.56	47.44	4.53
6081608200	14.39	24.03	20-25%	San Mateo	3833	7.88	72.97	19.15	11.11	42.47	0.89	0	40.05	5.48
6081608300	6.99	6.76	5-10%	San Mateo	3584	10.91	72.94	16.16	8.79	28.32	5.13	0	54.05	3.71
6081608400	20.34	38.34	35-40%	San Mateo	6030	9.88	79.62	10.5	29.93	21.51	2.85	0	39.24	6.47
6081608501	15.97	27.71	25-30%	San Mateo	5110	15.58	72.41	12.02	22.92	46.09	0.98	0.25	20.08	9.69
6081608502	8.05	8.65	5-10%	San Mateo	2675	10.06	74.62	15.33	17.16	44.41	1.46	0.45	32.6	3.93
6081608600	17.83	32.34	30-35%	San Mateo	4614	14.72	74.08	11.21	15.76	38.6	1.24	0	39.97	4.44
6081608700	5.85	4.44	1-5% (lowest scores)	San Mateo	6999	11.33	71.15	17.52	12.3	57.57	1.07	0	24.73	4.33
6081608800	2.25	0.35	1-5% (lowest scores)	San Mateo	6328	13.1	69.31	17.59	8.72	61.54	0.27	0.32	24.86	4.3
6081608900	4.18	1.80	1-5% (lowest scores)	San Mateo	6948	7.83	75.26	16.91	12.18	50.95	0.33	0.23	32.18	4.13
6081609000	6.39	5.47	5-10%	San Mateo	2470	12.27	65.95	21.78	12.06	62.91	4.17	1.01	14.17	5.67
6081609100	17.04	30.56	30-35%	San Mateo	1534	13.49	77.25	9.26	9.06	63.62	0.91	0.13	12.91	13.36
6081609201	9.62	11.99	10-15%	San Mateo	3628	16.57	67.39	16.04	6.09	75.8	0.72	0	10.97	6.42
6081609202	15.05	25.67	25-30%	San Mateo	4838	10.56	71	18.44	17.09	52.81	2.19	0	23.88	4.03
6081609300	4.41	2.13	1-5% (lowest scores)	San Mateo	3431	16.61	68.38	15.01	10.9	74.44	0	0	8.48	6.18
6081609400	3.38	0.93	1-5% (lowest scores)	San Mateo	3359	16.11	72.79	11.1	3.9	79.67	0	0	10.03	6.4
6081609500	2.04	0.26	1-5% (lowest scores)	San Mateo	4930	15.27	68.11	16.61	12.94	63.1	0	0	19.92	4.04
6081609601	1.10	0.03	1-5% (lowest scores)	San Mateo	3363	16.29	68.54	15.17	4.01	67.59	1.96	0	17.72	8.71
6081609602	3.36	0.92	1-5% (lowest scores)	San Mateo	1803	12.53	68.5	18.97	7.6	68.77	0	0	17.8	5.82
6081609603	2.45	0.42	1-5% (lowest scores)	San Mateo	5226	9.59	69.94	20.47	5.91	74.44	0.59	0	12.78	6.28
6081609700	1.35	0.06	1-5% (lowest scores)	San Mateo	4936	9.95	70.68	19.37	8.75	79.62	0.99	0	6	4.64
6081609800	3.04	0.67	1-5% (lowest scores)	San Mateo	4884	12.82	68.67	18.51	16.2	68.43	1.35	0	10.32	3.71
6081609900	2.17	0.30	1-5% (lowest scores)	San Mateo	3206	11.1	69.99	18.9	12.88	79.32	0	0.62	3.02	4.15
6081610000	8.35	9.24	5-10%	San Mateo	4985	10.43	75.53	14.04	21.73	61.1	0.84	0.16	13.48	2.69
6081610100	30.07	58.76	55-60%	San Mateo	2544	11.83	76.42	11.75	41.9	45.17	3.14	0.83	5.42	3.54
6081610201	46.84	84.22	80-85%	San Mateo	5568	10.7	76.69	12.61	69.2	16.16	4.27	0	8.08	2.28
6081610202	40.37	75.62	75-80%	San Mateo	4013	6.93	83.8	9.27	26.14	44.61	4.21	0.2	20.33	4.51
6081610203	36.14	69.42	65-70%	San Mateo	3878	19.6	75.17	5.23	81.51	7.99	1.01	0	7.69	1.81
6081610302	27.02	53.04	50-55%	San Mateo	3751	12.02	80.57	7.41	39.91	39	0.83	0.32	18.72	1.23
6081610303	8.19	8.90	5-10%	San Mateo	8045	14.24	74.06	11.7	4.71	38.02	0.76	0.5	47.21	8.8
6081610304	11.75	17.21	15-20%	San Mateo	4416	12.75	70.45	16.8	12.16	49.28	0.86	0	32.27	5.43
6081610400	30.59	59.82	55-60%	San Mateo	6049	11.79	77.45	10.76	64.56	21.33	2.28	0.13	10.25	1.45
6081610500	39.94	74.90	70-75%	San Mateo	5245	15.86	75.58	8.56	83.6	11.82	0.61	0	2.92	1.05
6081610601	30.05	58.75	55-60%	San Mateo	5432	17.6	76.84	5.56	80.8	9.19	1.22	0	6.59	2.21

6081610602	16.08	28.09	**25-30%**	San Mateo	3695	15.02	72.61	12.37	48.06	38.51	2.06	0.24	8.39	2.73
6081610700	20.80	39.57	**35-40%**	San Mateo	5801	8.81	76.5	14.69	38.68	45.65	0.45	0.07	12.62	2.53
6081610800	20.96	39.91	**35-40%**	San Mateo	4871	15.29	76	8.7	58.9	26.24	3.35	0	8.79	2.73
6081610900	25.23	49.28	**45-50%**	San Mateo	7137	9.81	82.63	7.57	55.96	34.27	0.73	0.31	6.21	2.52
6081611000	7.66	7.98	**5-10%**	San Mateo	6965	16.96	70.19	12.85	39.54	46.02	1.55	0	9.42	3.47
6081611100	3.18	0.79	**1-5% (lowest scores)**	San Mateo	6453	10.43	70.23	19.34	8.46	73.81	0.06	1.57	13.33	2.77
6081611200	5.73	4.15	**1-5% (lowest scores)**	San Mateo	2816	13.32	72.05	14.63	17.61	66.3	2.2	0	9.3	4.58
6081611300	7.19	7.15	**5-10%**	San Mateo	5377	11.96	69.96	18.08	20.35	65.98	0.2	0	9.54	3.92
6081611400	5.68	4.07	**1-5% (lowest scores)**	San Mateo	4332	6.76	69.69	23.55	5.17	70.66	1.02	0	19.85	3.3
6081611500	3.87	1.34	**1-5% (lowest scores)**	San Mateo	2836	11.5	67.91	20.59	3.21	67.17	0.46	0	22.81	6.35
6081611600	6.27	5.27	**5-10%**	San Mateo	2451	18.77	68.71	12.53	8.61	68.01	2.16	0.37	15.54	5.3
6081611700	30.77	60.21	**60-65%**	San Mateo	5801	13.7	79.28	7.02	56.28	10.57	16.39	0	13.86	2.9
6081611800	32.10	62.57	**60-65%**	San Mateo	4479	13.17	79.39	7.43	59.92	4	17.88	0	15.83	2.37
6081611900	39.74	74.60	**70-75%**	San Mateo	10368	13.32	77.85	8.83	58.06	14.65	14.06	0.1	8.96	4.17
6081612000	41.22	76.97	**75-80%**	San Mateo	7091	14.54	76.46	9	74.84	3.79	8.48	0	9.86	3.03
6081612100	33.38	64.75	**60-65%**	San Mateo	8646	24.83	72.09	3.08	64.27	18.58	4.26	0	9.86	3.03
6081612500	7.47	7.56	**5-10%**	San Mateo	4470	18.97	68.61	12.42	10.69	68.48	3.22	0	13.96	3.65
6081612600	7.43	7.50	**5-10%**	San Mateo	4538	15.91	68.77	15.32	3.68	74.42	0.11	0	17.56	4.23
6081612700	7.97	8.45	**5-10%**	San Mateo	2219	12.66	68.68	18.66	5	84.36	0.14	0	5.68	4.82
6081612800	4.26	1.99	**1-5% (lowest scores)**	San Mateo	3591	17.6	68.84	13.56	4.43	80.59	0.06	0	7.41	7.52
6081612900	12.46	19.14	**15-20%**	San Mateo	4788	12.99	68.32	18.69	5.3	71.47	1.94	0	16.83	4.45
6081613000	12.36	18.90	**15-20%**	San Mateo	3774	8.13	71.09	20.77	6.81	65.74	0.05	0	21.6	5.8
6081613200	5.14	3.27	**1-5% (lowest scores)**	San Mateo	7148	9.86	63.64	26.5	6.38	82.46	0.24	0.04	6.6	4.28
6081613300	8.45	9.52	**5-10%**	San Mateo	2970	10.34	64.55	25.12	9.9	74.98	1.75	0	9.16	4.21
6081613400	5.07	3.14	**1-5% (lowest scores)**	San Mateo	3154	11.51	70.13	18.36	9.13	82.56	0	0	5.17	3.14
6081613501	14.79	25.03	**25-30%**	San Mateo	5341	12.13	71.05	16.81	40.24	52.03	0.45	0.06	5.47	1.76
6081613502	9.94	12.76	**10-15%**	San Mateo	6519	8.28	76.21	15.51	13.42	78.54	0.58	0	4.83	2.62
6081613600	9.38	11.36	**10-15%**	San Mateo	6108	11.23	64.73	24.03	17.08	71.64	0.28	0.61	2.29	8.1
6081613700	12.29	18.71	**15-20%**	San Mateo	8999	8.39	67	24.61	26.35	64.65	0.28	0	6.42	2.31
6081613800	10.52	14.20	**10-15%**	San Mateo	3944	6.92	76.37	16.71	10.32	82.63	0.61	0	1.6	4.84
6081613900	7.69	8.03	**5-10%**	San Mateo	7097	12.5	73.61	13.89	8.38	58.63	3.78	2.13	21.98	5.1
6081614000	11.65	16.89	**15-20%**	San Mateo	5695	10.15	74.03	15.82	21.37	26.76	0.63	0	44.04	7.2
6081984300	NA	NA	**NA**	San Mateo	0	NA	NA	NA	NA	NA	NA	NA	NA	NA
6083000101	17.58	31.76	**30-35%**	Santa Barbara	6111	5.11	71.22	23.68	27.02	59.24	5.71	0.13	6.89	1.01
6083000102	12.57	19.35	**15-20%**	Santa Barbara	5424	7.95	67.13	24.93	22.88	68.44	0.04	0.9	4.74	3.01
6083000103	2.76	0.57	**1-5% (lowest scores)**	Santa Barbara	3433	7.31	66.56	26.13	12.03	82.67	0	0	1.25	4.05
6083000200	13.32	21.27	**20-25%**	Santa Barbara	4927	5.72	67.53	26.75	29.04	63.75	1.08	0	4.02	2.11
6083000301	23.91	46.58	**45-50%**	Santa Barbara	2604	9.52	79.19	11.29	29.03	59.79	0.73	0	4.26	6.18
6083000302	14.48	24.26	**20-25%**	Santa Barbara	4391	10.68	74.95	14.37	39.49	51.79	1.34	0	4.74	2.64
6083000400	9.65	12.13	**10-15%**	Santa Barbara	5426	8.22	71.08	20.7	13.86	79.28	0	0	5.88	0.98
6083000501	2.73	0.54	**1-5% (lowest scores)**	Santa Barbara	3350	5.61	64.84	29.55	7.97	82.36	0.27	0	7.16	2.24
6083000502	8.35	9.25	**5-10%**	Santa Barbara	6315	9.83	65.07	25.1	12.87	81.2	2.31	0.51	1.93	1.17
6083000600	11.45	16.49	**15-20%**	Santa Barbara	5555	5.54	72.19	22.27	13.92	76.99	0	0	7.2	1.89
6083000700	8.11	8.80	**5-10%**	Santa Barbara	7004	10.91	71.15	17.95	27.84	63.34	0.3	0	4.67	3.85
6083000801	25.18	49.14	**45-50%**	Santa Barbara	3550	13.38	70.9	15.72	71.69	25.58	0.51	0	2.03	0.2
6083000804	37.04	70.65	**70-75%**	Santa Barbara	6396	9.3	79.07	11.63	59.99	32.27	4.66	0.11	2.08	0.89
6083000900	31.83	62.08	**60-65%**	Santa Barbara	3574	3.16	78.37	18.47	43.31	49.05	2.46	0.17	2.99	2.01
6083001000	31.06	60.79	**60-65%**	Santa Barbara	6081	10.2	73.31	16.49	40.77	49.96	3.26	0.26	2.7	3.06
6083001101	22.81	43.96	**40-45%**	Santa Barbara	4973	19.14	71.63	9.23	54.57	37.76	1.75	0	3.62	2.29
6083001102	33.11	64.22	**60-65%**	Santa Barbara	4556	8.93	83.49	7.57	74.25	21.09	1.89	0.59	1.71	0.46
6083001203	18.97	35.06	**35-40%**	Santa Barbara	3008	6.62	65.26	28.13	22.34	72.14	1.33	0.33	3.46	0.4
6083001206	26.20	51.32	**50-55%**	Santa Barbara	4336	8.03	86	5.97	62.32	31.2	1.18	0	3.99	1.31
6083001208	9.89	12.63	**10-15%**	Santa Barbara	4331	7.9	77.49	14.62	24.82	67.51	2.31	1.09	2.36	1.92
6083001304	12.73	19.72	**15-20%**	Santa Barbara	8127	8.02	70.14	21.84	38.81	54.8	0.32	0	4.57	1.5
6083001306	7.31	7.36	**5-10%**	Santa Barbara	3549	8.71	57.34	33.95	16.85	76.81	0	0.73	3.94	1.66
6083001402	8.86	10.35	**10-15%**	Santa Barbara	3014	9.26	50.13	40.61	4.88	90.94	1.53	0	0.56	2.09
6083001500	2.46	0.43	**1-5% (lowest scores)**	Santa Barbara	2526	9.34	52.53	38.12	9.11	86.66	0	0	3.25	0.99
6083001601	19.62	36.52	**35-40%**	Santa Barbara	5768	12.29	68.2	19.5	43.38	50.59	0.1	0	3.43	2.5

6083001604	22.36	42.98	40-45%	Santa Barbara	4659	10.43	71.22	18.35	40.18	55.7	0	0	1.82	2.3
6083001704	23.94	46.66	45-50%	Santa Barbara	3192	12.91	67.32	19.77	60.34	35.81	1.79	0	1.47	0.6
6083001706	5.13	3.25	1-5% (lowest scores)	Santa Barbara	4072	7.98	56.48	35.54	26.94	71.39	0	0	0.79	0.88
6083001800	22.28	42.71	40-45%	Santa Barbara	1050	16.86	62.1	21.05	45.62	50.1	0.57	0.76	1.43	1.52
6083001901	16.14	28.27	25-30%	Santa Barbara	7519	13.03	66.95	20.02	26.56	66.67	1	0.48	2.59	2.7
6083001903	13.74	22.29	20-25%	Santa Barbara	6445	7.49	72.52	19.98	28.86	65.69	1.15	0	2.3	2
6083001905	8.93	10.51	10-15%	Santa Barbara	2620	7.52	63.59	28.89	22.48	72.52	0.84	0	2.29	1.87
6083001906	8.37	9.35	5-10%	Santa Barbara	5938	9.85	68.56	21.59	15.44	70.24	0.02	6.92	2.88	4.5
6083002005	9.19	11.03	10-15%	Santa Barbara	5691	13.21	67.3	19.49	22.42	68	0.46	1.92	1.83	5.38
6083002006	22.28	42.69	40-45%	Santa Barbara	2805	9.3	70.34	20.36	36.76	55.12	0.61	1.43	4.31	1.78
6083002007	14.76	24.90	20-25%	Santa Barbara	10983	11.65	74.58	13.78	40.09	46.14	1.73	0.15	8.29	3.59
6083002008	9.96	12.81	10-15%	Santa Barbara	7074	15.66	68.48	15.86	33.4	58.41	2.69	0	2.8	2.7
6083002009	14.02	23.12	20-25%	Santa Barbara	4008	12.82	68.29	18.89	33.41	59.78	0.7	1.47	3.27	1.37
6083002010	6.64	5.99	5-10%	Santa Barbara	4496	12.14	73.44	14.41	22.95	69.19	0.93	0.71	3.67	2.54
6083002011	28.53	55.96	55-60%	Santa Barbara	6302	15.87	69.52	14.61	64.73	25.66	1.17	0.3	3.94	4.21
6083002012	16.93	30.30	30-35%	Santa Barbara	3196	12.7	70.87	16.43	27.69	60.95	0.22	0	5.85	5.29
6083002013	7.93	8.35	5-10%	Santa Barbara	2716	7.73	64.18	28.09	20.25	69.44	3.17	0.26	2.32	4.57
6083002101	34.68	67.04	65-70%	Santa Barbara	4291	18.92	74.67	6.41	71.71	25.31	1.14	0.82	0.63	0.4
6083002102	31.21	61.07	60-65%	Santa Barbara	2398	15.1	72.02	12.89	65.72	30.61	0.96	0	0.54	2.17
6083002103	36.02	69.16	65-70%	Santa Barbara	4495	18.44	69.05	12.5	68.92	20.89	0.4	0.27	8.21	1.31
6083002205	26.42	51.73	50-55%	Santa Barbara	5606	23.99	66.02	9.99	78.72	15.07	0	0	4.78	1.43
6083002206	29.58	57.98	55-60%	Santa Barbara	5033	23.96	64.55	11.48	77.19	16.45	1.85	0	4.03	0.48
6083002209	24.99	48.70	45-50%	Santa Barbara	3613	14.92	77.72	7.36	83.56	11.9	0.77	0.03	3.1	0.64
6083002210	24.20	47.15	45-50%	Santa Barbara	6876	13.64	74.93	11.43	62.46	23.43	3.13	0	10.28	0.7
6083002211	23.70	45.90	45-50%	Santa Barbara	5742	16.58	58.29	25.13	56.69	31.33	1.64	0	4.53	5.82
6083002303	29.06	56.97	55-60%	Santa Barbara	6601	20.56	69.38	10.06	90.53	5.71	0.3	0	3.45	0
6083002304	36.59	69.99	65-70%	Santa Barbara	6041	19.98	74.64	5.38	90.65	4.12	0.2	0	4.44	0.6
6083002305	25.18	49.17	45-50%	Santa Barbara	7077	14.46	77.59	7.96	92.24	4.78	0.35	0	2.16	0.47
6083002306	29.05	56.95	55-60%	Santa Barbara	9003	17.54	69.69	12.77	74.12	14.87	0	0	10.64	0.37
6083002402	37.03	70.64	70-75%	Santa Barbara	13173	19.65	75	5.35	78.62	13.22	2.51	0	4.7	0.95
6083002403	36.90	70.41	70-75%	Santa Barbara	6850	25.34	70.55	4.1	95.72	4.12	0	0	0	0.16
6083002404	26.19	51.31	50-55%	Santa Barbara	8949	27.4	68.88	3.72	93.79	3.32	1.42	0.13	1.11	0.23
6083002502	44.00	80.81	80-85%	Santa Barbara	7573	17.01	71.95	11.04	90.39	5.78	0.54	0	3.05	0.24
6083002604	NA	NA	NA	Santa Barbara	2879	0.73	95.42	3.86	44.43	30.18	11.6	3.89	7.75	2.15
6083002606	18.80	34.73	30-35%	Santa Barbara	3400	25.09	74.91	0	19.5	51.21	10.68	0.76	5.03	12.82
6083002702	35.59	68.55	65-70%	Santa Barbara	7781	25.6	69.79	4.61	76.35	18.03	2.56	0	1.23	1.84
6083002703	26.92	52.90	50-55%	Santa Barbara	4416	14.4	72.15	13.45	65.51	29.1	1.09	0	0.45	3.85
6083002705	30.27	59.23	55-60%	Santa Barbara	4162	14.66	70.09	15.26	63.14	28.45	5.43	0	2.04	0.94
6083002706	30.11	58.90	55-60%	Santa Barbara	6440	18.99	73.56	7.45	74.22	19.01	1.34	0.47	1.1	3.87
6083002707	22.16	42.44	40-45%	Santa Barbara	2173	13.76	71.01	15.23	39.62	52.65	3.5	0	2.35	1.89
6083002708	14.48	24.28	20-25%	Santa Barbara	2302	12.86	60.51	26.63	36.32	51.26	3.82	0.43	2	6.17
6083002802	25.22	49.26	45-50%	Santa Barbara	7591	15.89	72.12	11.99	38.33	37.06	8.83	1.86	11.4	2.52
6083002806	15.67	27.02	25-30%	Santa Barbara	2505	14.41	69.82	15.77	43.99	47.7	1.4	0	3.63	3.27
6083002808	15.67	27.04	25-30%	Santa Barbara	8114	11.39	70.62	17.99	22.39	62.16	4.04	0.46	3.42	7.52
6083002809	19.48	36.16	35-40%	Santa Barbara	5229	10.23	75.22	14.55	38.82	50.91	3.04	0.78	3.79	2.66
6083002906	16.70	29.61	25-30%	Santa Barbara	3663	8.9	67.76	23.34	24.38	65.44	2.46	0.22	6.22	1.28
6083002907	5.05	3.13	1-5% (lowest scores)	Santa Barbara	3662	10.19	61	28.81	14.06	73.87	0.19	0	8	3.88
6083002909	11.22	15.97	15-20%	Santa Barbara	5852	12.35	72.52	15.12	35.99	53.04	3.64	0	5.38	1.95
6083002913	14.77	24.94	20-25%	Santa Barbara	3852	6.67	65.11	28.22	18.22	77.41	0	0.21	3.61	0.55
6083002914	14.33	23.89	20-25%	Santa Barbara	3237	9.76	69.51	20.73	21.19	65.77	0.99	0.31	8.25	3.49
6083002915	8.69	9.95	5-10%	Santa Barbara	834	18.35	79.02	2.64	14.99	57.31	11.27	0	10.67	5.76
6083002922	16.87	30.16	30-35%	Santa Barbara	11983	3.4	95.91	0.69	25.08	33.49	1.81	0	34.29	5.33
6083002924	10.71	14.67	10-15%	Santa Barbara	6280	0.29	99.71	0	22.8	52.55	2.71	0	17.9	4.04
6083002926	12.18	18.39	15-20%	Santa Barbara	6272	1.12	95.04	3.84	23.63	57.21	6.46	0.1	10	2.61
6083002928	17.97	32.64	30-35%	Santa Barbara	4490	2.38	96.86	0.76	23.05	58.13	4.1	0	10.2	4.52
6083002930	16.06	28.03	25-30%	Santa Barbara	8421	11.15	78.49	10.36	30.76	51.43	2.02	0.01	11.34	4.44
6083002932	15.77	27.27	25-30%	Santa Barbara	2273	10.34	70.44	19.23	33.35	57.24	0.26	0.26	7.57	1.32
6083003001	41.13	76.82	75-80%	Santa Barbara	5766	10.13	75.34	14.53	50.57	29.76	6.47	0	11.42	1.79

6083003004	16.11	28.16	**25-30%**	Santa Barbara	4885	8.86	74.29	16.85	31.81	60.76	0.92	0	3.28	3.23
6083003005	20.36	38.41	**35-40%**	Santa Barbara	5109	11.24	76.32	12.45	39.5	49.05	0.33	2.45	6.65	2.02
6083003007	6.78	6.33	**5-10%**	Santa Barbara	3536	11.45	51.44	37.1	11.71	82.89	0	0.4	2.52	2.49
6083003102	22.01	42.18	**40-45%**	Santa Barbara	3296	6.92	75.42	17.66	41.72	50.67	3.03	0	2.67	1.91
6083980000	NA	NA	**NA**	Santa Barbara	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
6083980100	NA	NA	**NA**	Santa Barbara	10	20	80	0	60	20	20	0	0	0
6085500100	37.37	71.19	**70-75%**	Santa Clara	8306	15.51	74.75	9.74	55.32	13.33	2.78	0.07	24.03	4.47
6085500200	25.77	50.50	**50-55%**	Santa Clara	5969	8.93	84.96	6.11	36.99	30.32	6.79	1.59	19.74	4.57
6085500300	26.05	51.05	**50-55%**	Santa Clara	3788	6.89	87.72	5.39	31.65	38.99	5.33	0.4	16.9	6.73
6085500400	29.44	57.69	**55-60%**	Santa Clara	2657	13.32	75.8	10.88	38.54	39.07	5.08	0.45	10.88	5.98
6085500500	18.06	32.87	**30-35%**	Santa Clara	5500	11.38	68.47	20.15	20.55	57	3.44	0.55	15.73	2.75
6085500600	27.50	53.95	**50-55%**	Santa Clara	5884	9.77	79.21	11.01	17.95	43.81	5.81	0.37	20.12	11.93
6085500800	28.87	56.71	**55-60%**	Santa Clara	4180	6.77	82.01	11.22	28.44	40.48	6.79	0	19.35	4.93
6085500901	33.53	65.05	**65-70%**	Santa Clara	4197	3.81	85.92	10.27	20.23	31.31	5.1	0	38.62	4.74
6085500902	33.75	65.42	**65-70%**	Santa Clara	5659	1.47	97.05	1.48	31.74	23.03	7.92	0	31.61	5.71
6085501000	33.13	64.26	**60-65%**	Santa Clara	5414	8.96	79.26	11.78	42.11	22.89	9.14	0	20.9	4.95
6085501101	28.09	55.18	**55-60%**	Santa Clara	4695	8.29	80.17	11.54	36.27	25.9	5.39	0	28.81	3.62
6085501102	37.46	71.32	**70-75%**	Santa Clara	4305	13.17	74.49	12.33	55.49	27.43	1.88	0	9.08	6.11
6085501200	26.32	51.50	**50-55%**	Santa Clara	4111	9.19	78.4	12.41	55.27	28.24	2.65	0.61	9.49	3.75
6085501300	28.72	56.35	**55-60%**	Santa Clara	3951	2.73	86.76	10.5	20.48	49.53	4.81	0.35	20.05	4.78
6085501401	37.79	71.72	**70-75%**	Santa Clara	3226	17.3	72.78	9.92	65.59	11.38	8.25	0	13.08	1.7
6085501402	30.03	58.74	**55-60%**	Santa Clara	3046	14.41	77.22	8.37	70.09	19.21	1.18	0	8.27	1.25
6085501501	37.31	71.03	**70-75%**	Santa Clara	4623	16.07	75.82	8.11	64.44	5.21	3.16	0	26.78	0.41
6085501502	39.83	74.72	**70-75%**	Santa Clara	4843	14.35	78.55	7.1	65.48	11.81	1.42	0	17.7	3.59
6085501600	47.58	85.01	**85-90%**	Santa Clara	7716	8.98	86.21	4.81	48.95	22.46	1.87	0.47	21.14	5.12
6085501700	34.84	67.32	**65-70%**	Santa Clara	4982	16.42	78.76	4.82	78.14	12.77	1.06	0	2.71	5.32
6085501800	20.46	38.62	**35-40%**	Santa Clara	4823	10.45	76.86	12.69	43.42	41.16	1.62	1.33	9.85	2.63
6085501900	20.39	38.44	**35-40%**	Santa Clara	5401	7.22	85.69	7.09	24.2	34.7	8.04	0	22.07	11
6085502001	21.50	41.14	**40-45%**	Santa Clara	5093	12.53	77.77	9.7	44.26	32.53	0.84	0.18	13.37	8.82
6085502002	27.18	53.40	**50-55%**	Santa Clara	6052	12.69	81.49	5.82	63.98	21.36	3.57	0	7.83	3.26
6085502101	16.01	27.86	**25-30%**	Santa Clara	5081	12.73	71.6	15.67	22.1	42.77	3.66	1.12	25.72	4.63
6085502102	23.79	46.21	**45-50%**	Santa Clara	7726	12.31	78.72	8.97	51.26	29.06	5.88	0.21	12.3	1.31
6085502201	15.39	26.44	**25-30%**	Santa Clara	7541	13.66	76.22	10.12	25.83	37.41	6.48	0	20.42	9.85
6085502202	8.67	9.88	**5-10%**	Santa Clara	2735	10.31	69.62	20.07	16.05	63.03	3.77	0	12.1	5.05
6085502301	14.16	23.42	**20-25%**	Santa Clara	3535	12.11	68.32	19.58	15.9	66.42	2.52	0	8.07	7.1
6085502302	11.85	17.52	**15-20%**	Santa Clara	3000	12.07	75.17	12.77	37.1	49.77	2.47	0	7.9	2.77
6085502400	18.74	34.59	**30-35%**	Santa Clara	6909	12.59	69.79	17.61	16.21	66.33	1.78	0	12.13	3.55
6085502500	12.44	19.07	**15-20%**	Santa Clara	6746	19.37	67.11	13.52	15.67	65.03	2	0	11.07	6.23
6085502601	8.06	8.67	**5-10%**	Santa Clara	2673	10.81	58.77	30.42	14.74	73.33	0.41	0	9.31	2.21
6085502603	4.91	2.89	**1-5% (lowest scores)**	Santa Clara	2830	13.43	72.08	14.49	21.45	63.07	0.57	0.18	9.33	5.41
6085502604	15.36	26.35	**25-30%**	Santa Clara	4116	7.39	85.16	7.46	15.99	59.94	4.54	1.8	14.72	3.01
6085502701	11.25	16.05	**15-20%**	Santa Clara	5235	11.19	75.7	13.1	23.38	46.55	4.91	0.76	20.02	4.37
6085502702	8.19	8.93	**5-10%**	Santa Clara	8456	15.13	70.8	14.07	13.45	53.93	2.51	0.19	24.36	5.57
6085502800	15.25	26.11	**25-30%**	Santa Clara	4363	12.84	71.56	15.61	18.75	53.45	0.48	0	19.64	7.68
6085502901	13.94	22.83	**20-25%**	Santa Clara	6104	12.52	72.48	15.01	21.89	55.77	1.87	0.84	17.79	1.85
6085502902	6.18	5.07	**5-10%**	Santa Clara	7893	13.4	71.42	15.18	15.68	59.88	0.75	0	20.32	3.37
6085502903	5.07	3.16	**1-5% (lowest scores)**	Santa Clara	5172	13.67	66.92	19.41	19.86	61.83	0.17	0.44	10.69	7
6085502906	11.27	16.11	**15-20%**	Santa Clara	4542	15.72	74.68	9.6	19.57	49.01	1.81	0	26.64	2.97
6085502907	5.23	3.43	**1-5% (lowest scores)**	Santa Clara	3936	11.08	70.91	18.01	12.73	61.08	0.36	0.15	19.33	6.35
6085502908	6.68	6.09	**5-10%**	Santa Clara	7294	16.37	71.92	11.71	26.6	52.52	0.84	0	14.93	5.11
6085502909	9.66	12.14	**10-15%**	Santa Clara	5416	16.01	71.66	12.33	30.1	42.37	1.72	0	19.59	6.22
6085502910	15.52	26.78	**25-30%**	Santa Clara	3733	13.31	72.11	14.57	25.42	49.58	2.09	1.58	15.8	5.52
6085503001	10.96	15.36	**15-20%**	Santa Clara	4123	13.7	66.7	19.6	12.83	66.75	1.82	0	12.25	6.35
6085503002	10.42	13.91	**10-15%**	Santa Clara	3589	14.07	68.32	17.61	10.67	61.69	5.82	0	18.61	3.2
6085503003	11.11	15.67	**15-20%**	Santa Clara	5388	12.77	71.75	15.48	13.4	60	0.69	0	17.26	8.65
6085503105	42.71	78.97	**75-80%**	Santa Clara	2460	6.02	72.03	21.95	31.02	4.8	0	0	62.97	1.22
6085503108	18.85	34.83	**30-35%**	Santa Clara	8222	13.27	76.03	10.7	29.42	24.82	7.75	0.47	35.17	2.37
6085503110	41.35	77.17	**75-80%**	Santa Clara	4917	16.15	77.43	6.43	66.44	3.36	1.24	0.47	28.49	0

6085503111	26.63	52.29	50-55%	Santa Clara	5132	10.46	77.84	11.69	43.88	3.45	0.33	0	52.33	0
6085503112	41.62	77.50	75-80%	Santa Clara	4141	13.19	78.22	8.6	53.78	14.47	7.56	0	22.89	1.3
6085503113	35.11	67.75	65-70%	Santa Clara	5052	16.71	75.73	7.56	77.04	10.53	1.41	0	9.6	1.43
6085503115	17.74	32.12	30-35%	Santa Clara	7372	13.2	73.49	13.31	20.13	37.51	1.53	0	37.04	3.78
6085503116	18.63	34.32	30-35%	Santa Clara	6178	14.18	75.11	10.72	27.74	31.89	2.22	0	33.12	5.03
6085503117	30.31	59.32	55-60%	Santa Clara	3071	13.87	73.33	12.8	58.81	1.95	1.11	0	37.19	0.94
6085503118	18.71	34.54	30-35%	Santa Clara	5286	13.79	80.42	5.79	42.34	10.03	3.9	0.19	41.43	2.12
6085503121	33.77	65.47	65-70%	Santa Clara	4788	14.95	77.05	8	65.62	13.07	1.19	0.21	16.37	3.53
6085503122	36.08	69.25	65-70%	Santa Clara	3602	19.07	68.85	12.08	40.45	5.02	3.14	0	49.03	2.36
6085503123	30.69	60.09	60-65%	Santa Clara	3901	9.31	76.29	14.41	50.19	26.3	2.36	0	17.53	3.61
6085503204	35.15	67.80	65-70%	Santa Clara	8105	12.29	76.87	10.85	58.4	6	2.16	0.11	29.8	3.54
6085503207	22.90	44.20	40-45%	Santa Clara	4150	6.27	74.12	19.61	18.17	5.86	3.37	0.34	70.55	1.71
6085503208	32.47	63.26	60-65%	Santa Clara	4631	14.19	77.63	8.18	62.19	4.62	4.25	0.63	27.01	1.3
6085503210	29.00	56.93	55-60%	Santa Clara	4254	10.37	76.85	12.79	36.48	8.7	0.73	0	52.28	1.81
6085503211	23.61	45.69	45-50%	Santa Clara	4592	9.39	73.63	16.99	28.2	11.04	1.44	0	56.66	2.66
6085503212	26.87	52.76	50-55%	Santa Clara	4379	8.43	74.56	17.01	26.42	4.38	5.75	0.02	61.11	2.31
6085503213	26.98	52.95	50-55%	Santa Clara	4925	9.95	79.37	10.68	28	5.99	0.55	0.2	60.79	4.47
6085503214	40.00	74.97	70-75%	Santa Clara	8468	13.66	73.44	12.9	38.69	2.69	0	0	57.03	1.59
6085503217	28.91	56.80	55-60%	Santa Clara	4834	14.6	79.69	5.71	72.78	4.12	0.83	0	19.22	3.06
6085503218	36.62	70.03	70-75%	Santa Clara	5118	17.9	72.96	9.14	65.14	4.4	0.94	0	29.17	0.35
6085503304	26.49	51.93	50-55%	Santa Clara	7213	10.88	74.86	14.25	36.13	8.25	2.73	0.75	51.46	0.68
6085503305	24.13	47.02	45-50%	Santa Clara	5810	12.19	67.16	20.65	38.95	2.62	0.93	0	54.13	3.37
6085503306	23.72	45.98	45-50%	Santa Clara	4373	10.43	75.83	13.74	59.55	2.72	1.14	0.21	35.31	1.07
6085503312	8.73	10.04	10-15%	Santa Clara	4027	8.67	78.79	12.54	42.44	18.4	0.94	0	36.25	1.96
6085503313	7.21	7.17	5-10%	Santa Clara	4629	8.01	75.55	16.44	19.75	15.53	1.49	0	60.9	2.33
6085503315	22.74	43.86	40-45%	Santa Clara	8637	11.02	78.74	10.24	41.74	6.07	1.17	0	49.76	1.26
6085503321	16.18	28.38	25-30%	Santa Clara	4690	8.66	72.6	18.74	11.56	5.63	0.94	0	81.07	0.81
6085503322	9.21	11.07	10-15%	Santa Clara	4495	8.3	77	14.71	38.15	9.83	4.36	0	46.72	0.93
6085503323	11.85	17.54	15-20%	Santa Clara	4763	10.35	77.93	11.72	36.2	10.77	5.27	0	46.69	1.07
6085503324	12.19	18.42	15-20%	Santa Clara	3625	10.57	73.9	15.53	17.54	7.39	2.81	0	69.74	2.51
6085503325	12.25	18.62	15-20%	Santa Clara	4722	10.36	74.67	14.97	17.77	7.14	4.91	0	69.06	1.12
6085503326	5.94	4.58	1-5% (lowest scores)	Santa Clara	7263	12.03	76.57	11.4	9.21	8.34	0.34	0	80.05	2.05
6085503327	17.70	32.06	30-35%	Santa Clara	4504	11.08	67.34	21.58	28.46	11.61	1.89	0	54.62	3.42
6085503329	7.49	7.64	5-10%	Santa Clara	4107	14.27	74.39	11.35	10.3	8.72	2.63	0	76.09	2.26
6085503330	6.49	5.75	5-10%	Santa Clara	7849	9.48	81.6	8.92	8.73	9.68	0	0.46	79.83	1.3
6085503331	4.65	2.47	1-5% (lowest scores)	Santa Clara	3405	5.43	58.44	36.12	21.2	38.03	2.06	0.06	35.59	3.05
6085503332	3.06	0.69	1-5% (lowest scores)	Santa Clara	5642	5.69	46.49	47.82	7.11	60.01	1.13	0	25.95	5.8
6085503333	8.99	10.60	10-15%	Santa Clara	4896	11.89	76.63	11.48	22.65	21.04	6.58	0	46.45	3.29
6085503334	6.03	4.73	1-5% (lowest scores)	Santa Clara	8938	12.12	77.97	9.91	8.47	20.32	1.64	0.21	64.66	4.7
6085503336	18.86	34.87	30-35%	Santa Clara	3580	11.15	77.46	11.4	33.6	4.02	1.82	0	58.91	1.65
6085503337	23.82	46.31	45-50%	Santa Clara	3455	7.38	74.36	18.26	19.48	7.79	3.24	2.17	66.63	0.69
6085503401	36.34	69.64	65-70%	Santa Clara	4468	13.45	75.16	11.39	76.05	2.39	1.12	0	20.21	0.22
6085503402	33.69	65.28	65-70%	Santa Clara	5286	15.21	72.29	12.5	65.25	3.23	0.42	0	30.68	0.42
6085503504	22.65	43.58	40-45%	Santa Clara	6346	13.84	75.5	10.67	74.69	0.3	0.72	0	24.1	0.19
6085503506	22.88	44.18	40-45%	Santa Clara	6816	12.69	79.81	7.5	63.1	2.73	1.48	0.44	30.25	2
6085503507	22.45	43.19	40-45%	Santa Clara	2397	14.35	73.72	11.93	68.5	0.88	0	0	29.75	0.88
6085503508	22.36	42.97	40-45%	Santa Clara	6533	13.13	76.3	10.56	70.01	3.81	2.11	0	16.55	7.52
6085503509	14.23	23.59	20-25%	Santa Clara	4449	14.83	75.5	9.67	60.67	5.69	1.57	0	30.57	1.51
6085503510	25.37	49.61	45-50%	Santa Clara	5826	11.24	80.18	8.58	70.67	7.26	1.03	0	19.34	1.7
6085503511	15.86	27.47	25-30%	Santa Clara	3620	7.87	77.38	14.75	45.17	7.96	1.99	0	43.2	1.69
6085503601	47.93	85.36	85-90%	Santa Clara	3383	16.58	72.95	10.46	53.15	21.05	0.92	0.95	19.92	4.02
6085503602	40.41	75.71	75-80%	Santa Clara	5602	11.53	77.85	10.62	67.03	5.37	2.7	0	23.92	0.98
6085503703	28.29	55.45	55-60%	Santa Clara	4073	12.37	77.36	10.26	65.04	1.47	4.17	0	27.92	1.4
6085503707	30.79	60.25	60-65%	Santa Clara	6087	14.95	77.84	7.21	54.23	2.74	4.8	0	36.14	2.09
6085503708	24.25	47.28	45-50%	Santa Clara	2955	7.65	74.01	18.34	19.12	5.58	1.52	0.34	71	2.44
6085503709	36.47	69.84	65-70%	Santa Clara	6457	10.76	71.77	17.47	36.27	3.41	0.45	0.19	59.5	0.19
6085503710	39.35	73.85	70-75%	Santa Clara	3858	17.11	69.31	13.58	68.82	4.56	0.36	0.44	20.58	5.24
6085503711	33.03	64.11	60-65%	Santa Clara	5368	19.65	71.65	8.7	77.37	2.72	1.55	0	16.71	1.66

6085503712	40.45	75.77	75-80%	Santa Clara	4484	10.39	69.11	20.5	47.55	10.33	0.45	0.13	40.88	0.67
6085503713	30.16	59.05	55-60%	Santa Clara	3550	14.65	68.48	16.87	58.87	4.79	2.59	0	32.4	1.35
6085503802	14.10	23.32	20-25%	Santa Clara	8810	9.61	77	13.38	44.87	15.01	2.18	0	35.55	2.4
6085503803	17.80	32.24	30-35%	Santa Clara	4704	10.57	73.64	15.8	20.73	10.76	2.23	0	64.05	2.23
6085503804	19.92	37.38	35-40%	Santa Clara	5285	11.14	71.79	17.07	28.42	15.44	0.74	0	52.73	2.67
6085503902	20.79	39.54	35-40%	Santa Clara	5973	17.93	70.92	11.15	67.64	7.97	1.05	0.35	20.66	2.33
6085503903	25.75	50.49	50-55%	Santa Clara	3773	11.53	74.56	13.91	46.14	9.09	1.09	0.32	42.99	0.37
6085504001	22.27	42.68	40-45%	Santa Clara	6078	9.36	80.96	9.67	71.78	4.69	1.14	0	19.05	3.34
6085504002	24.36	47.55	45-50%	Santa Clara	6772	16.2	73.11	10.69	62.92	2.51	1.39	0.25	29.73	3.2
6085504101	16.61	29.37	25-30%	Santa Clara	5095	7.67	80.37	11.95	73.95	8.34	0.88	0.08	14.23	2.51
6085504102	18.46	33.83	30-35%	Santa Clara	5883	18.17	71.22	10.61	76.3	7.02	0.58	0	16	0.1
6085504201	7.54	7.75	5-10%	Santa Clara	5079	12.21	72.08	15.71	33.94	44.5	1.97	0.02	16.03	3.54
6085504202	7.00	6.77	5-10%	Santa Clara	4359	10.25	67.52	22.23	24.94	39.53	1.33	0.39	31.87	1.95
6085504307	16.77	29.85	25-30%	Santa Clara	5532	9.83	76.05	14.12	18.02	10.85	0.92	0	67.1	3.11
6085504308	7.30	7.35	5-10%	Santa Clara	4537	9.9	69.43	20.67	19.31	23.21	1.72	0	51.29	4.47
6085504311	21.76	41.67	40-45%	Santa Clara	7331	12.22	77.19	10.59	7.07	10.19	0.25	0	78.26	4.24
6085504314	10.29	13.69	10-15%	Santa Clara	4897	14.27	74	11.72	17.87	11.39	1.37	0	66.88	2.49
6085504315	7.95	8.40	5-10%	Santa Clara	6781	8.69	76.29	15.03	16.09	11.97	0.5	0.09	69.41	1.93
6085504316	17.44	31.37	30-35%	Santa Clara	4760	9.89	74.37	15.74	12.37	9.92	3.21	0.23	72.06	2.21
6085504317	12.10	18.23	15-20%	Santa Clara	4786	6.02	76.68	17.3	11.45	9.82	0.19	0	74.91	3.64
6085504318	43.42	80.06	80-85%	Santa Clara	6095	11.37	81.03	7.6	39.13	9.37	0.66	0.18	49.07	1.59
6085504319	34.01	65.83	65-70%	Santa Clara	7633	13.18	71.64	15.18	18.71	9.24	2.41	0.93	66.8	1.91
6085504320	16.93	30.28	30-35%	Santa Clara	2931	7.98	75.37	16.65	7.54	17.81	0.75	0	70.25	3.65
6085504321	17.90	32.45	30-35%	Santa Clara	5574	8.97	75.6	15.43	16.42	8.45	1.44	0.38	71.94	1.38
6085504322	23.73	46.02	45-50%	Santa Clara	5936	14.71	79.51	5.78	7.43	12.4	10.31	0	69.29	0.57
6085504323	21.66	41.41	40-45%	Santa Clara	6005	12.27	73.96	13.77	12.44	6.84	1.23	0.52	76.62	2.35
6085504410	26.74	52.47	50-55%	Santa Clara	4724	8.32	75.76	15.92	18.54	12.15	3.45	0	61.18	4.68
6085504411	13.00	20.51	20-25%	Santa Clara	5884	9.35	77.55	13.1	14.06	15.45	1.9	0	65.98	2.62
6085504412	21.32	40.61	40-45%	Santa Clara	4873	11.2	77.47	11.33	20.5	13.03	0.72	0	62.28	3.47
6085504413	22.18	42.49	40-45%	Santa Clara	1981	12.92	66.38	20.7	5.3	16.36	0.61	0	71.48	6.26
6085504414	19.72	36.78	35-40%	Santa Clara	5221	9.77	75.12	15.11	3.96	10	0.29	0	83.88	1.88
6085504415	7.12	6.98	5-10%	Santa Clara	5836	13.04	72.89	14.07	4.93	16.3	7.63	0.17	69.16	1.82
6085504416	16.06	28.05	25-30%	Santa Clara	3777	11.97	75.59	12.44	12.92	11.52	7.2	0	64.6	3.76
6085504417	NA	NA	NA	Santa Clara	269	11.15	56.51	32.34	3.72	39.03	3.35	0	53.9	0
6085504418	23.34	45.23	45-50%	Santa Clara	5115	11.77	77.44	10.79	21.84	10.54	2.78	0	62.85	1.99
6085504420	12.48	19.19	15-20%	Santa Clara	4694	6.84	72.56	20.6	10.37	14.78	0	0	72.48	2.36
6085504421	20.21	38.02	35-40%	Santa Clara	5437	11.46	73.44	15.1	6.25	10.32	4.89	0	72.25	6.29
6085504422	22.69	43.71	40-45%	Santa Clara	3849	10.63	72.25	17.12	26.92	7.2	3.25	0	58.77	3.87
6085504423	8.47	9.61	5-10%	Santa Clara	2551	9.13	74.01	16.86	22.66	22.54	6.04	0	45.36	3.41
6085504504	21.35	40.71	40-45%	Santa Clara	12367	12.98	80.97	6.05	17.26	8.74	5.47	0.36	62.57	5.59
6085504505	16.45	28.92	25-30%	Santa Clara	9011	13.83	76.32	9.85	10.71	12.13	0.88	0.24	72.13	3.91
6085504506	23.43	45.45	45-50%	Santa Clara	7088	24.86	64.28	10.86	14.48	6.49	3.01	0.21	67.85	7.97
6085504507	26.65	52.36	50-55%	Santa Clara	6459	15.36	72.1	12.54	22.22	10.2	1.47	1.38	61.34	3.39
6085504601	25.54	49.95	45-50%	Santa Clara	1016	6.89	79.43	13.68	32.97	38.48	0	0	24.61	3.94
6085504602	34.61	66.97	65-70%	Santa Clara	2355	15.2	73.76	11.04	58.94	20.21	5.18	1.49	13.84	0.34
6085504700	22.00	42.15	40-45%	Santa Clara	588	37.24	62.07	0.68	18.54	75.34	2.38	0	0.85	2.89
6085504802	26.81	52.65	50-55%	Santa Clara	5516	11	73.37	15.63	27.39	19.78	2.28	0	48.89	1.65
6085504803	22.77	43.92	40-45%	Santa Clara	7021	13.73	74.51	11.76	19.04	17.02	2.01	0	59.25	2.68
6085504805	23.25	45.05	45-50%	Santa Clara	7286	8.19	77.61	14.19	18.02	42.33	3.77	0	32.78	3.1
6085504806	22.21	42.57	40-45%	Santa Clara	3052	12.06	72.84	15.1	29.16	18.12	0.46	0	44.39	7.86
6085504901	14.76	24.91	20-25%	Santa Clara	9956	14.52	80.37	5.1	5.29	22.45	1.1	0	66.47	4.68
6085505001	22.99	44.49	40-45%	Santa Clara	10204	13.06	77.46	9.48	14.99	21.53	6.77	0.13	52.78	3.79
6085505006	20.74	39.36	35-40%	Santa Clara	11441	12.26	86.35	1.39	4.26	24.25	2.18	0	67.58	1.74
6085505007	20.49	38.79	35-40%	Santa Clara	4239	10.69	70.49	18.83	19.63	24.46	5.43	0	47.42	3.07
6085505008	13.28	21.22	20-25%	Santa Clara	7769	13.04	86.02	0.94	7.03	22.98	4.87	0	60.72	4.41
6085505009	23.03	44.60	40-45%	Santa Clara	11332	10.91	82.87	6.22	21.73	20.37	8.2	0	45.7	4.01
6085505100	36.03	69.18	65-70%	Santa Clara	4076	10.75	77.36	11.9	33.81	22.15	6.31	0	34.4	3.34
6085505202	30.42	59.53	55-60%	Santa Clara	6936	9.95	80.55	9.5	34.6	26.02	2.61	0	29.38	7.38

6085505203	23.89	46.50	45-50%	Santa Clara	5964	5.47	89.92	4.61	21.28	48.31	3.05	0	22.27	5.1
6085505301	24.59	47.92	45-50%	Santa Clara	5197	9.91	80.39	9.7	18.43	24.3	4.29	0	50.7	2.27
6085505302	25.59	50.06	50-55%	Santa Clara	4168	11.85	72.41	15.74	20.2	32.29	5.13	0	38.12	4.25
6085505303	29.28	57.43	55-60%	Santa Clara	6345	18.63	68.56	12.81	26.21	26.35	2.05	0	40.14	5.25
6085505304	18.17	33.11	30-35%	Santa Clara	3266	8.51	74.95	16.53	19.53	35.09	2.66	0.31	40.45	1.96
6085505305	19.57	36.40	35-40%	Santa Clara	5859	10.63	77.73	11.64	14.52	35.65	1.59	0.58	46.5	1.16
6085505401	16.83	29.99	25-30%	Santa Clara	7423	13.9	78.23	7.87	18.77	21.66	0.71	0.94	55.89	2.02
6085505402	12.38	18.95	15-20%	Santa Clara	3125	12.48	70.34	17.18	23.68	33.02	2.3	0.03	34.27	6.69
6085505403	17.85	32.38	30-35%	Santa Clara	8742	13.94	76.54	9.52	20.56	26.05	0.57	0	47.9	4.93
6085505500	15.50	26.70	25-30%	Santa Clara	4365	14.3	71.94	13.77	24.58	40.78	5.09	0	21.58	7.97
6085505600	23.01	44.54	40-45%	Santa Clara	4557	4.52	85.78	9.7	20.41	52.47	3.07	0	20.83	3.23
6085505700	23.26	45.06	45-50%	Santa Clara	6726	12.71	81.03	6.26	24.41	35.64	5.32	0	25.81	8.82
6085505800	10.86	15.15	15-20%	Santa Clara	4279	12.62	73.55	13.84	27.2	51.51	2.22	0	14.77	4.3
6085505900	12.32	18.77	15-20%	Santa Clara	7393	10.66	73.57	15.77	15.83	48.6	2.43	0	31.02	2.12
6085506000	12.37	18.92	15-20%	Santa Clara	4752	12.23	72.26	15.51	18.01	50.08	2.34	0	26.83	2.74
6085506101	10.97	15.37	15-20%	Santa Clara	4381	10.57	71.65	17.78	11.53	41.93	1.07	0	42.02	3.45
6085506102	11.99	17.91	15-20%	Santa Clara	4158	12.96	69.87	17.17	8.9	37.3	3.03	0	47.54	3.22
6085506103	12.24	18.52	15-20%	Santa Clara	5090	15.72	66.9	17.39	7.66	29.76	1.22	0	56.95	4.4
6085506202	9.29	11.17	10-15%	Santa Clara	7389	14.52	67.29	18.19	5.95	39.71	1.52	0	47.85	4.97
6085506203	18.93	34.95	30-35%	Santa Clara	6589	14.08	75.91	10	12.22	18.36	3.66	0.82	63.26	1.68
6085506204	10.85	15.12	15-20%	Santa Clara	5568	11.35	73.42	15.23	8.53	23.85	3.97	0	58.57	5.08
6085506301	13.32	21.28	20-25%	Santa Clara	5443	10.84	73.75	15.41	18.98	40.07	7.28	0.04	29.52	4.12
6085506302	11.13	15.73	15-20%	Santa Clara	6778	9.75	78.96	11.29	18.87	48.27	3.47	0.68	26.62	2.1
6085506304	14.37	23.98	20-25%	Santa Clara	5262	14.52	80.05	5.44	25.79	27.77	2.3	0	42.78	1.37
6085506305	13.99	22.98	20-25%	Santa Clara	6726	16.27	74.28	9.46	30.23	31.5	17.99	0	18.63	1.65
6085506401	18.19	33.18	30-35%	Santa Clara	5017	9.47	77.06	13.47	24.5	41.12	6.44	0	21.61	6.34
6085506402	17.97	32.63	30-35%	Santa Clara	5784	13.62	74.45	11.93	39.78	37.38	4.89	0	14.77	3.18
6085506501	18.07	32.88	30-35%	Santa Clara	7421	17.14	76.69	6.17	41.85	22.21	4.39	0	25.95	5.59
6085506502	13.20	20.92	20-25%	Santa Clara	3941	10.78	77.72	11.49	18.55	61.86	3.53	0.28	11.29	4.49
6085506503	13.34	21.34	20-25%	Santa Clara	6241	9.31	72.74	17.95	24.26	48.73	3.91	0	20.33	2.77
6085506601	14.47	24.24	20-25%	Santa Clara	4568	17.62	70.53	11.84	21.63	38.51	2.71	0	32.82	4.33
6085506603	10.73	14.75	10-15%	Santa Clara	3923	14.02	71.65	14.33	12.8	52.41	1.35	0.05	28.04	5.35
6085506604	6.48	5.72	5-10%	Santa Clara	7753	17.22	71.16	11.62	10.92	48.25	0.05	0	36.95	3.82
6085506605	8.89	10.44	10-15%	Santa Clara	4387	16.25	73.35	10.39	15.18	44.79	3.74	0	27.58	8.71
6085506606	9.64	12.09	10-15%	Santa Clara	4468	12.78	73.61	13.61	23.46	43.42	2.82	0	26.21	4.1
6085506701	10.09	13.15	10-15%	Santa Clara	3998	11.33	74.39	14.28	17.51	46.17	0	0	31.02	5.3
6085506702	13.06	20.68	20-25%	Santa Clara	5860	14.86	72.24	12.9	19.71	52.39	2.59	0.39	20.8	4.11
6085506703	8.44	9.49	5-10%	Santa Clara	3564	13.41	74.41	12.18	12.54	50.53	2.19	0	28.14	6.59
6085506801	10.67	14.60	10-15%	Santa Clara	5832	9.88	74.13	16	10.07	72.55	0.6	0	12.14	4.65
6085506802	8.34	9.22	5-10%	Santa Clara	5674	14.59	72.74	12.67	14.17	58.81	0.95	0	22.17	3.89
6085506803	9.32	11.23	10-15%	Santa Clara	7344	12.49	77.15	10.36	13.93	52.19	1.84	0	29.87	2.17
6085506804	5.32	3.59	1-5% (lowest scores)	Santa Clara	3920	14.52	70.46	15.03	4.69	64.08	1.1	0.26	24.21	5.66
6085506900	4.19	1.84	1-5% (lowest scores)	Santa Clara	7939	9.7	71.41	18.89	7.85	65.9	1.32	0	19.16	5.77
6085507001	5.89	4.49	1-5% (lowest scores)	Santa Clara	7095	7.58	70.78	21.63	6.62	82.57	0.89	0	8.33	1.59
6085507002	4.80	2.75	1-5% (lowest scores)	Santa Clara	3050	7.61	68.46	23.93	3.25	81.05	0.26	0	10.56	4.89
6085507100	7.60	7.88	5-10%	Santa Clara	3211	12.52	73.78	13.7	16.47	71.41	0	0	8.78	3.33
6085507203	3.72	1.13	1-5% (lowest scores)	Santa Clara	2971	10.43	75.7	13.87	17.44	59.21	0.54	0	18.98	3.84
6085507205	10.98	15.41	15-20%	Santa Clara	4853	9.73	66.52	23.76	5.44	68.08	0.62	0	20.89	4.97
6085507206	3.83	1.25	1-5% (lowest scores)	Santa Clara	2426	11.05	63.85	25.1	5.23	72.3	0.16	0	19.66	2.64
6085507301	3.91	1.37	1-5% (lowest scores)	Santa Clara	6602	9.68	62.41	27.92	4.27	47.62	0.03	0.45	44.3	3.32
6085507302	1.31	0.05	1-5% (lowest scores)	Santa Clara	2892	6.54	67.36	26.11	2.25	61.24	0.28	0	26.24	9.99
6085507401	5.73	4.14	1-5% (lowest scores)	Santa Clara	5858	5.57	71.61	22.82	2.3	32.78	0.05	0.43	60.6	3.84
6085507402	10.59	14.37	10-15%	Santa Clara	4013	11.59	67.11	21.31	4.68	60.58	0.45	0	28.01	6.28
6085507500	5.19	3.34	1-5% (lowest scores)	Santa Clara	5927	9.01	72.06	18.93	1.6	31.58	0.61	0	64.4	1.81
6085507600	4.50	2.31	1-5% (lowest scores)	Santa Clara	5566	4.76	72.37	22.87	3.36	51.17	1.31	0.09	42.13	1.94
6085507701	9.43	11.50	10-15%	Santa Clara	3534	10.02	71.84	18.14	1.36	29.12	0.85	0	66.21	2.46
6085507702	4.56	2.34	1-5% (lowest scores)	Santa Clara	6161	6.78	71.45	21.77	0	21.36	0	0	76	2.65
6085507703	6.53	5.82	5-10%	Santa Clara	8116	9.6	70.61	19.79	2.98	36.75	0.16	0	56.99	3.12

6085507805	12.49	19.21	15-20%	Santa Clara	5465	11.97	78.99	9.04	7.78	26.79	0	0	60.91	4.52
6085507806	12.00	17.94	15-20%	Santa Clara	5971	15.64	75.28	9.08	2.6	13.15	0	0.49	80.82	2.95
6085507807	10.51	14.15	10-15%	Santa Clara	3383	9.28	79.22	11.5	5.05	15.19	0	0	77.09	2.66
6085507808	3.97	1.46	1-5% (lowest scores)	Santa Clara	5580	11.67	76.76	11.58	1.79	19.61	0	0	75.46	3.14
6085507903	3.53	1.03	1-5% (lowest scores)	Santa Clara	4968	6.14	74.13	19.73	1.33	20.21	0.83	0	74.46	3.18
6085507904	9.16	10.98	10-15%	Santa Clara	3195	9.67	73.8	16.53	3.29	26.7	0	1.97	65.63	2.41
6085507905	11.47	16.53	15-20%	Santa Clara	6063	10.24	80.74	9.02	6.32	19.35	0	0	71.27	3.07
6085507906	5.22	3.42	1-5% (lowest scores)	Santa Clara	4286	9.78	75.92	14.3	1.38	21.16	0.68	0.21	74.52	2.05
6085508001	12.16	18.34	15-20%	Santa Clara	7487	10.27	73.74	15.99	2.11	22.67	0	0	71.56	3.66
6085508003	11.72	17.12	15-20%	Santa Clara	2480	10.81	76.25	12.94	4.84	33.02	4.27	0.36	55.12	2.38
6085508004	16.21	28.43	25-30%	Santa Clara	6221	15.67	73.77	10.56	6.46	21.07	6.3	0	63.94	2.22
6085508101	12.11	18.26	15-20%	Santa Clara	6768	18	70.7	11.3	2.22	24.9	0.01	0	70.88	1.99
6085508102	12.06	18.13	15-20%	Santa Clara	3408	15.67	73.8	10.53	4.49	29.02	0	1.61	61.71	3.17
6085508202	11.41	16.39	15-20%	Santa Clara	7600	13.75	70.83	15.42	9	32.59	1.91	0	49.98	6.53
6085508203	5.50	3.87	1-5% (lowest scores)	Santa Clara	5630	17.16	67.62	15.22	3.98	31.08	0.36	0	59.25	5.33
6085508204	8.35	9.27	5-10%	Santa Clara	4122	15.14	73.05	11.81	4.75	38.43	0.44	0	52.26	4.12
6085508301	6.15	4.99	1-5% (lowest scores)	Santa Clara	4667	8.91	68.37	22.71	4.14	42.73	1.09	0	46.69	5.36
6085508303	4.10	1.70	1-5% (lowest scores)	Santa Clara	2518	8.94	70.17	20.89	3.38	51.23	0	0	41.26	4.13
6085508304	9.55	11.80	10-15%	Santa Clara	8452	13.7	77.39	8.91	11.71	22.98	4.09	0.28	57.56	3.37
6085508401	10.84	15.09	15-20%	Santa Clara	7144	16.9	69.32	13.79	6.27	48.08	0.46	0.13	41.18	3.88
6085508403	4.27	2.02	1-5% (lowest scores)	Santa Clara	3131	12.52	66.85	20.63	4.85	49.28	0.38	0	36.28	9.2
6085508404	9.16	10.99	10-15%	Santa Clara	6947	17.23	69.12	13.65	11.24	40.49	0	1.53	43.54	3.2
6085508503	12.15	18.33	15-20%	Santa Clara	6575	16.38	71.76	11.86	8.99	24.97	0.26	0	61.72	4.06
6085508504	14.81	25.08	25-30%	Santa Clara	8604	16.28	75.95	7.76	15.84	18.41	1.03	0	57.42	7.3
6085508505	13.04	20.61	20-25%	Santa Clara	4871	13.1	68.53	18.37	8.54	39.85	0	0.39	48.57	2.65
6085508507	11.01	15.51	15-20%	Santa Clara	2926	14.56	79.39	6.05	9.77	22.21	3.42	0	58.1	6.49
6085508508	14.28	23.76	20-25%	Santa Clara	5576	16.8	70.73	12.46	13.93	30.69	0.57	0	48.08	6.73
6085508601	17.26	30.94	30-35%	Santa Clara	3722	12.39	73	14.62	15.1	34.9	0	0	42.45	7.55
6085508602	11.03	15.56	15-20%	Santa Clara	5054	11.59	77.96	10.45	21.45	42.8	0.93	0.46	28.91	5.46
6085508703	17.20	30.77	30-35%	Santa Clara	8274	14.03	77.44	8.53	13.33	25.36	2.68	0.08	55.79	2.76
6085508704	19.27	35.78	35-40%	Santa Clara	7587	12.76	82.09	5.15	19.65	25.86	3.99	0.12	47.32	3.06
6085508800	17.62	31.90	30-35%	Santa Clara	3884	10.61	82.57	6.82	27.96	29.81	1.26	0	34.34	6.62
6085508900	29.44	57.72	55-60%	Santa Clara	5184	14.87	76.06	9.07	36.27	18.38	2.6	0	40.71	2.04
6085509000	27.92	54.79	50-55%	Santa Clara	7570	13.34	79.41	7.25	42.67	23.22	0.4	1.22	27.92	4.58
6085509102	13.67	22.13	20-25%	Santa Clara	5051	9.01	84	6.99	8.04	26.21	2.49	0	58.74	4.51
6085509105	15.75	27.23	25-30%	Santa Clara	7166	13.86	73.32	12.82	16.97	38.63	0.7	0	41.1	2.61
6085509106	11.29	16.15	15-20%	Santa Clara	4473	12.18	77.58	10.24	27.88	29.44	0.8	0.18	37.51	4.18
6085509107	16.83	30.02	30-35%	Santa Clara	4957	11.64	83.09	5.27	25.08	27.64	2.22	0.44	42.93	1.69
6085509108	13.65	22.06	20-25%	Santa Clara	4428	14.41	75.54	10.05	16.55	41.31	1.42	0.2	35.73	4.79
6085509109	7.87	8.25	5-10%	Santa Clara	4978	16.73	76.86	6.41	8.62	47.01	0.38	0.68	36.6	6.71
6085509201	12.79	19.92	15-20%	Santa Clara	5524	10.73	79.89	9.38	7.17	52.5	8.09	0.27	28.48	3.49
6085509202	21.77	41.73	40-45%	Santa Clara	4708	9.77	74.68	15.55	18.69	39.02	2.74	0	33.2	6.35
6085509302	10.52	14.18	10-15%	Santa Clara	3241	14.25	69.24	16.51	10.52	60.66	1.02	0	21.97	5.83
6085509303	14.22	23.56	20-25%	Santa Clara	3563	9.74	70.59	19.67	15.3	36.49	4.27	0	35.53	8.42
6085509304	23.32	45.20	45-50%	Santa Clara	3607	10.4	82.98	6.63	33.66	36.1	0.36	0	26.06	3.83
6085509401	10.48	14.04	10-15%	Santa Clara	3806	13.85	79.4	6.75	15.11	33.92	3.44	0	43.35	4.18
6085509403	20.01	37.53	35-40%	Santa Clara	5779	14.86	82.02	3.11	34.26	29.54	2.39	0.45	31.41	1.96
6085509404	22.70	43.76	40-45%	Santa Clara	7129	16.44	74.75	8.81	28.43	34.23	0.5	0	35.24	1.6
6085509500	16.45	28.95	25-30%	Santa Clara	5729	8.38	86.16	5.46	32.24	36.67	3.7	0	25.25	2.13
6085509600	12.75	19.77	15-20%	Santa Clara	3686	8.9	81.63	9.47	15.98	49.59	1.28	0	28.76	4.4
6085509700	5.79	4.27	1-5% (lowest scores)	Santa Clara	3135	11.74	78.76	9.51	13.3	60.93	1.02	0	19.81	4.94
6085509801	9.98	12.87	10-15%	Santa Clara	5606	12.5	73.85	13.65	11.17	56.15	0.98	0	26.1	5.6
6085509802	6.79	6.34	5-10%	Santa Clara	3167	16.01	71.3	12.69	6.03	49.45	0.44	0	38.64	5.43
6085509901	4.66	2.48	1-5% (lowest scores)	Santa Clara	1938	12.02	68.58	19.4	5.06	61.82	0	0	28.84	4.28
6085509902	14.53	24.45	20-25%	Santa Clara	5125	10.97	68.8	20.23	12.16	50.67	0.51	1	32.49	3.18
6085510001	6.90	6.58	5-10%	Santa Clara	6564	10.6	69.21	20.19	4.04	54.77	0.15	0	34.9	6.14
6085510002	4.20	1.85	1-5% (lowest scores)	Santa Clara	3616	11.73	71.38	16.9	8.41	51.66	0.44	0	34.65	4.84
6085510100	3.83	1.26	1-5% (lowest scores)	Santa Clara	2906	14.01	63.08	22.92	3.54	59.26	0	0.76	31.31	5.13

6085510200	7.35	7.40	5-10%	Santa Clara	4624	12.13	70.2	17.67	4.35	63.08	1.19	0	26.82	4.56
6085510300	3.94	1.40	1-5% (lowest scores)	Santa Clara	4246	10.5	67.4	22.09	3.32	63.33	0.52	0	27.18	5.65
6085510400	3.17	0.77	1-5% (lowest scores)	Santa Clara	3705	13.79	71.17	15.03	4.1	53.66	0.65	0.05	32.93	8.61
6085510500	4.12	1.71	1-5% (lowest scores)	Santa Clara	4541	11.96	60.89	27.15	2.18	63.55	0.22	0	30.41	3.63
6085510600	8.84	10.30	10-15%	Santa Clara	5761	11.75	69.55	18.69	9.79	53.84	1.79	0	30.52	4.06
6085510700	10.40	13.82	10-15%	Santa Clara	5240	11.35	77.35	11.3	2.67	43.49	4.05	0	45.46	4.33
6085510801	15.50	26.64	25-30%	Santa Clara	5954	9.22	67.97	22.81	1.86	49.7	1.34	0	42.07	5.02
6085510802	5.73	4.12	1-5% (lowest scores)	Santa Clara	2038	11.73	66.39	21.88	8.73	51.52	1.82	0	30.42	7.51
6085510803	6.43	5.58	5-10%	Santa Clara	2700	9.93	71.26	18.81	11.26	41.19	2.3	0	43	2.26
6085510900	3.33	0.88	1-5% (lowest scores)	Santa Clara	5494	12.54	69.86	17.6	7.57	52.26	1.42	0	35.37	3.39
6085511000	8.67	9.85	5-10%	Santa Clara	6833	10.77	77.15	12.07	4.9	45.32	0.89	0	41.76	7.11
6085511100	8.62	9.82	5-10%	Santa Clara	5543	11.98	70.77	17.25	4.93	54.52	1.1	0.09	34.15	5.21
6085511200	5.69	4.08	1-5% (lowest scores)	Santa Clara	4698	12.56	69.8	17.65	1.53	66.52	1.26	0	25.46	5.24
6085511301	7.51	7.67	5-10%	Santa Clara	3888	9.16	65.46	25.39	6.61	69.8	4.3	0	12.86	6.43
6085511302	10.99	15.43	15-20%	Santa Clara	3998	6.53	67.16	26.31	7.9	59.7	1.75	0	26.44	4.2
6085511400	7.28	7.25	5-10%	Santa Clara	3505	9.79	70.47	19.74	5.42	56.38	0	1.71	28.07	8.42
6085511500	9.07	10.75	10-15%	Santa Clara	7992	7.76	70.66	21.58	6.12	64.44	1.4	0.9	21.57	5.57
6085511608	NA	NA	NA	Santa Clara	3302	0.58	99.3	0.12	23.74	41.1	5.03	0.58	22.29	7.27
6085511609	6.71	6.15	5-10%	Santa Clara	3407	15.44	61.26	23.3	6.11	66.22	1.56	0	21.84	4.29
6085511701	4.68	2.51	1-5% (lowest scores)	Santa Clara	4392	8.29	64.85	26.87	5.87	58.33	1.18	0	31.01	3.6
6085511702	7.06	6.87	5-10%	Santa Clara	2635	10.55	68.2	21.25	4.59	63.91	0.19	0.3	23.34	7.67
6085511704	5.22	3.39	1-5% (lowest scores)	Santa Clara	4789	5.64	66.51	27.86	2.82	58.61	0	0	35.48	3.09
6085511705	4.72	2.55	1-5% (lowest scores)	Santa Clara	1113	10.42	68.19	21.38	3.68	61.01	4.85	0	23	7.46
6085511707	1.61	0.09	1-5% (lowest scores)	Santa Clara	2820	4.82	60	35.18	4.65	66.88	1.99	0.35	23.58	2.55
6085511800	6.07	4.83	1-5% (lowest scores)	Santa Clara	4335	9.43	75.94	14.63	4.43	87.73	0.07	0	3.97	3.81
6085511905	8.67	9.87	5-10%	Santa Clara	3408	13.41	70.92	15.67	4.93	45.89	0.59	0	43.96	4.64
6085511907	4.48	2.27	1-5% (lowest scores)	Santa Clara	4223	11.53	74.71	13.76	9.28	38.65	3.55	0.85	44.71	2.96
6085511909	7.15	7.06	5-10%	Santa Clara	7737	10.07	70.18	19.75	4.47	43.01	0	0	46.94	5.57
6085511910	2.90	0.63	1-5% (lowest scores)	Santa Clara	3145	10.21	70.91	18.89	3.21	60.79	2.54	0.38	25.37	7.69
6085511911	10.59	14.38	10-15%	Santa Clara	4934	6.81	73.1	20.09	6.63	54.26	8.72	0.22	25.66	4.52
6085511912	5.89	4.48	1-5% (lowest scores)	Santa Clara	5678	11.87	70.87	17.26	7.43	34.47	2.13	0.77	49.33	5.86
6085511913	4.72	2.56	1-5% (lowest scores)	Santa Clara	4320	11.04	68.15	20.81	12.15	61.27	0.6	0	23.57	2.41
6085511914	5.65	4.01	1-5% (lowest scores)	Santa Clara	5722	11.94	66.32	21.74	8.16	57.83	4.84	0	22.61	6.55
6085511915	11.19	15.90	15-20%	Santa Clara	3664	15.01	73.47	11.52	41.78	34.17	7.45	0	15.04	1.56
6085511916	6.85	6.49	5-10%	Santa Clara	4797	18.47	67.75	13.78	11.32	49.59	1.98	0	28.58	8.53
6085512001	11.75	17.23	15-20%	Santa Clara	6868	12.07	77.52	10.41	23.59	24.87	0.09	0	47.55	3.9
6085512005	14.55	24.46	20-25%	Santa Clara	6817	9.52	74.11	16.37	24.54	51.17	1.89	0	17.34	5.06
6085512017	30.36	59.37	55-60%	Santa Clara	7565	14.06	76.81	9.12	48.86	21.8	2.59	0.49	22.04	4.23
6085512019	13.56	21.86	20-25%	Santa Clara	4863	13.88	69.75	16.37	30.41	28.6	6.46	1.01	28.68	4.83
6085512020	18.66	34.38	30-35%	Santa Clara	7825	13.85	80.49	5.66	34.2	24.38	1.37	0	30.94	9.11
6085512021	12.81	19.96	15-20%	Santa Clara	6491	12.14	76.12	11.74	32.77	30.81	4.24	0.77	26.93	4.48
6085512022	21.04	40.04	40-45%	Santa Clara	5523	12.31	72.77	14.92	33.42	27.18	2.97	0.58	32.54	3.31
6085512023	16.41	28.83	25-30%	Santa Clara	5553	13.07	78.68	8.25	43.98	25.27	6.92	0.56	19.5	3.78
6085512024	12.06	18.14	15-20%	Santa Clara	5187	12.32	74.44	13.24	25.76	41.37	6.02	0.1	20.92	5.84
6085512025	16.54	29.21	25-30%	Santa Clara	3124	12.16	62.87	24.97	26.79	40.59	7.39	0	24.26	0.96
6085512026	17.28	31.01	30-35%	Santa Clara	4120	14.56	72.23	13.2	40.46	22.74	7.33	0.27	25.05	4.15
6085512027	15.02	25.61	25-30%	Santa Clara	4830	14.72	71.35	13.93	25.92	33.02	3.89	0.56	31.2	5.4
6085512029	20.24	38.06	35-40%	Santa Clara	6698	12.48	72.63	14.89	31.65	44.79	2.27	0	16.63	4.66
6085512030	5.45	3.74	1-5% (lowest scores)	Santa Clara	3350	15.34	71.1	13.55	25.7	47.94	1.88	0.24	20.06	4.18
6085512031	11.14	15.77	15-20%	Santa Clara	4661	11.35	75.39	13.26	25.83	45.61	1.46	0.13	17.22	9.74
6085512032	22.06	42.25	40-45%	Santa Clara	2997	10.71	71.94	17.35	31.4	43.11	1.6	0	19.22	4.67
6085512033	17.02	30.51	30-35%	Santa Clara	9884	13.52	76.74	9.74	27.11	34.21	3.96	0.6	28.13	6
6085512034	9.96	12.82	10-15%	Santa Clara	3082	11.97	75.76	12.26	21.64	44.13	0.36	0	26.02	7.85
6085512035	10.33	13.75	10-15%	Santa Clara	4924	11.58	72.83	15.6	30.24	42.4	1.71	0	21.3	4.35
6085512036	17.24	30.90	30-35%	Santa Clara	5187	15.02	75.75	9.23	22.58	36.57	3.49	0	31.71	5.65
6085512037	12.74	19.76	15-20%	Santa Clara	3416	15.75	71.31	12.94	25.5	44.03	1.29	0	19.96	9.22
6085512038	21.11	40.19	40-45%	Santa Clara	3254	12.75	79.26	7.99	26.49	40.1	0.83	0	30.92	1.66
6085512039	21.41	40.91	40-45%	Santa Clara	5402	14.33	74.36	11.31	31.82	13.64	5.24	0	47.56	1.74

6085512042	17.40	31.25	**30-35%**	Santa Clara	3020	5.43	79.83	14.74	37.55	9.11	4.11	2.15	42.98	4.11
6085512043	33.51	64.98	**60-65%**	Santa Clara	6583	18.68	72.08	9.24	62.42	8.31	3.77	0	23.96	1.55
6085512045	8.79	10.19	**10-15%**	Santa Clara	5653	11.32	75.55	13.13	16.93	53.09	1.72	0	22.52	5.75
6085512047	7.94	8.37	**5-10%**	Santa Clara	5808	11.28	74.05	14.67	28.7	46.18	1.36	0	20.42	3.34
6085512052	15.22	26.08	**25-30%**	Santa Clara	4473	14.51	74.58	10.91	28.91	50.35	0.96	0	15.18	4.61
6085512053	11.27	16.10	**15-20%**	Santa Clara	4451	10.76	75.35	13.88	34.58	38.13	4.61	0	18.24	4.45
6085512100	19.00	35.19	**35-40%**	Santa Clara	1527	10.67	68.7	20.63	50.88	33.53	0	0	14.8	0.79
6085512200	8.37	9.37	**5-10%**	Santa Clara	3859	11.4	62.63	25.97	16.71	66.86	1.32	0	11.07	4.04
6085512305	12.00	17.93	**15-20%**	Santa Clara	5039	10.14	76.27	13.59	26	46.36	0.99	0	21.1	5.56
6085512307	13.68	22.16	**20-25%**	Santa Clara	6884	14.67	65.3	20.03	22.49	57.48	1.13	0	13.14	5.75
6085512308	11.56	16.75	**15-20%**	Santa Clara	8784	10.82	74.66	14.53	22.76	54.08	2.17	0	14.87	6.12
6085512309	14.98	25.52	**25-30%**	Santa Clara	5026	8.71	75.87	15.42	25.69	62.44	0.64	0.14	5.83	5.27
6085512310	37.99	72.14	**70-75%**	Santa Clara	5050	15.6	75.96	8.44	40.63	36.42	2.51	0	16.79	3.64
6085512311	21.63	41.34	**40-45%**	Santa Clara	4211	10.76	72.38	16.86	38.83	44.1	3.23	0	11.87	1.97
6085512312	14.78	24.97	**20-25%**	Santa Clara	3624	15.98	72.63	11.4	32.45	46.5	0.75	0	13.16	7.15
6085512313	17.53	31.66	**30-35%**	Santa Clara	3843	14.52	76.42	9.06	52.75	29.69	3.56	0.16	10.74	3.1
6085512314	14.61	24.57	**20-25%**	Santa Clara	6522	15.5	69.81	14.69	40.97	46.21	0.51	0	10.17	2.15
6085512401	24.42	47.68	**45-50%**	Santa Clara	4635	10.68	70.49	18.83	43.19	46.04	3.65	0	4.06	3.06
6085512402	25.70	50.34	**50-55%**	Santa Clara	5030	10.44	71.07	18.49	43.2	41.33	0.83	0.66	8.71	5.27
6085512503	10.99	15.42	**15-20%**	Santa Clara	9105	12.52	75.31	12.17	31.71	51.8	0.86	0	12.71	2.93
6085512505	19.09	35.39	**35-40%**	Santa Clara	8465	16.48	74.01	9.51	65.42	21.22	0.79	0	9.64	2.93
6085512506	27.78	54.46	**50-55%**	Santa Clara	7227	16.99	78.46	4.55	71.94	17.2	0.53	0.86	6.72	2.75
6085512508	28.68	56.29	**55-60%**	Santa Clara	8351	12.43	73.92	13.65	61.45	30.7	0.13	0.16	5.75	1.81
6085512509	23.68	45.80	**45-50%**	Santa Clara	5952	12.92	76.09	10.99	53.63	25.32	4.49	0	12.32	4.25
6085512510	18.41	33.69	**30-35%**	Santa Clara	7345	14.27	71.03	14.7	48.29	34.81	1.33	0	12.42	3.14
6085512602	42.21	78.33	**75-80%**	Santa Clara	2404	10.82	73.04	16.14	41.22	45.47	0.37	0	12.06	0.87
6085512603	55.28	92.71	**90-95%**	Santa Clara	4634	14.67	79.56	5.76	85.82	9.47	0.22	0.63	3.69	0.17
6085512604	41.57	77.41	**75-80%**	Santa Clara	4886	16.03	73.19	10.79	85.8	10.05	0.59	0.18	2.54	0.84
6085513000	16.11	28.15	**25-30%**	Santa Clara	9578	3	97	0	15.31	41.57	2.61	0.1	33.97	6.43
6085513500	15.00	25.55	**25-30%**	Santa Clara	1202	9.65	63.81	26.54	39.27	43.84	2.08	0	9.9	4.91
6087100100	6.25	5.18	**5-10%**	Santa Cruz	2234	8.1	73.32	18.58	15.8	73.01	2.78	0	5.24	3.18
6087100200	19.84	37.10	**35-40%**	Santa Cruz	7156	10.61	73.13	16.27	22.41	65.5	0.49	0.17	6.89	4.54
6087100300	16.27	28.53	**25-30%**	Santa Cruz	3563	6.06	72.78	21.16	10.47	73	1.96	0.2	8.87	5.5
6087100400	10.92	15.27	**15-20%**	Santa Cruz	10486	1.25	98.29	0.46	28.63	32.71	2.43	0.1	29.49	6.64
6087100500	15.32	26.24	**25-30%**	Santa Cruz	6440	4.36	84.08	11.55	16.82	66.02	1.55	0	12.61	3
6087100600	12.77	19.84	**15-20%**	Santa Cruz	3665	9.9	75.12	14.98	20.74	65.18	0.68	0	2.97	10.42
6087100700	20.48	38.67	**35-40%**	Santa Cruz	2015	1.49	85.71	12.8	17.37	76.03	0	0	2.23	4.37
6087100800	13.26	21.12	**20-25%**	Santa Cruz	6608	7.16	82.58	10.26	26.62	60.82	1.45	0.3	4.31	6.49
6087100900	9.92	12.73	**10-15%**	Santa Cruz	4397	7.03	77.12	15.85	18.01	75.12	0.48	0	2.73	3.66
6087101000	20.89	39.79	**35-40%**	Santa Cruz	8081	6.14	84.69	9.17	29.3	53.84	4.07	0.24	8.45	4.1
6087101100	10.83	15.05	**15-20%**	Santa Cruz	5567	9.99	71.19	18.83	10.54	77.29	3.43	0.59	4.28	3.86
6087101200	18.19	33.22	**30-35%**	Santa Cruz	3174	6.27	74.8	18.94	15.47	74.73	0	0.16	5.99	3.65
6087110100	29.89	58.45	**55-60%**	Santa Cruz	7760	19.73	63.8	16.47	75.09	21.53	0	0	1.73	1.65
6087110200	35.61	68.57	**65-70%**	Santa Cruz	7957	13.65	72.18	14.18	71.13	23.02	1.86	0	3.59	0.39
6087110300	43.09	79.64	**75-80%**	Santa Cruz	7275	20.12	73.73	6.14	93.62	5.33	0.07	0	0.65	0.33
6087110400	44.05	80.93	**80-85%**	Santa Cruz	8077	20	75.84	4.16	84.33	10.46	0.02	0	4.94	0.25
6087110501	38.81	73.22	**70-75%**	Santa Cruz	8594	19.33	73.04	7.63	75.63	22.29	0.09	0	1.07	0.91
6087110502	29.07	56.98	**55-60%**	Santa Cruz	6423	14.67	77.5	7.83	88.23	8.53	0	0	2.76	0.48
6087110600	33.52	65.02	**65-70%**	Santa Cruz	8241	14.67	71.74	13.59	82.57	13.35	1.3	0	2.78	0
6087110700	26.88	52.79	**50-55%**	Santa Cruz	3159	15.89	68.22	15.89	77.62	17.63	0	0	4.08	0.66
6087120200	8.99	10.62	**10-15%**	Santa Cruz	4684	6.49	71.52	21.99	13.9	76.9	1.94	0.09	2.6	4.57
6087120301	8.23	8.98	**5-10%**	Santa Cruz	5312	10.84	66.38	22.78	13.57	80.57	0.7	0	1.22	3.93
6087120302	7.79	8.14	**5-10%**	Santa Cruz	3054	7.96	79.21	12.84	7.37	88.87	0	0	0.92	2.85
6087120400	6.83	6.44	**5-10%**	Santa Cruz	4884	9.54	75.39	15.07	10.03	82.43	1	0.76	1.82	3.95
6087120500	6.21	5.12	**5-10%**	Santa Cruz	5738	9.43	70.69	19.88	9.18	77.34	0.1	0	5.42	7.95
6087120600	7.77	8.11	**5-10%**	Santa Cruz	4781	7.53	74.65	17.82	8.78	84.38	1.34	0	2.05	3.45
6087120700	13.77	22.44	**20-25%**	Santa Cruz	4307	14.46	68.63	16.9	11.84	77.85	0	0.65	4.67	4.99
6087120800	7.17	7.14	**5-10%**	Santa Cruz	5779	10.04	62.9	27.06	6.58	81.47	1.61	0	3.89	6.45

6087120900	8.58	9.77	5-10%	Santa Cruz	8746	11.86	73.07	15.07	14.7	74.27	0.61	0	7.8	2.62
6087121000	2.01	0.24	1-5% (lowest scores)	Santa Cruz	3578	6.04	72.75	21.21	3.72	89.18	0	0	4.3	2.79
6087121100	6.92	6.62	5-10%	Santa Cruz	3229	8.58	67.73	23.69	17.87	74.14	0.09	0	2.04	5.85
6087121200	4.46	2.21	1-5% (lowest scores)	Santa Cruz	6547	8.8	72.78	18.42	4.96	86.59	0.14	0.06	1.97	6.28
6087121300	7.12	6.97	5-10%	Santa Cruz	4271	11.71	68.23	20.07	35.35	57.01	0	0	2.9	4.73
6087121401	13.69	22.21	20-25%	Santa Cruz	2755	7.59	70.16	22.25	22.72	67.59	1.09	2.21	4.75	1.63
6087121402	15.80	27.37	25-30%	Santa Cruz	4309	13.14	76	10.86	37.6	53.72	0.26	0.23	6.78	1.42
6087121403	12.85	20.08	20-25%	Santa Cruz	3382	11.83	70.64	17.53	29.18	63.16	1.21	0	2.99	3.46
6087121500	16.48	29.03	25-30%	Santa Cruz	5196	8.76	72.61	18.63	27.62	67.63	0.73	0	0	4.02
6087121600	8.21	8.96	5-10%	Santa Cruz	6578	4.91	76.89	18.2	24.14	70.33	1.7	0.36	2.55	0.91
6087121700	11.20	15.92	15-20%	Santa Cruz	7387	13.04	68.96	18	31.12	59.02	0.96	0.73	3.49	4.67
6087121800	12.04	18.09	15-20%	Santa Cruz	4352	9.95	61.49	28.56	17.88	72.17	0	0	3.93	6.02
6087122001	5.77	4.22	1-5% (lowest scores)	Santa Cruz	4926	9.03	72.7	18.27	13.3	79.86	0.65	0.14	3.25	2.8
6087122002	2.17	0.32	1-5% (lowest scores)	Santa Cruz	3253	7.53	69.17	23.3	6.73	89.7	0.71	0	1.81	1.05
6087122003	12.71	19.68	15-20%	Santa Cruz	7248	10.87	69.62	19.51	16.2	74.54	0.28	0.59	3.31	5.08
6087122100	11.81	17.36	15-20%	Santa Cruz	3286	10.04	71.12	18.84	16.68	76.29	0.67	0	2.47	3.9
6087122201	7.24	7.20	5-10%	Santa Cruz	6506	4.75	70.53	24.72	9.24	83.94	1.31	0.02	3.6	1.91
6087122202	6.05	4.78	1-5% (lowest scores)	Santa Cruz	2328	6.7	70.36	22.94	13.92	76.12	0.39	0	3.52	6.06
6087122203	4.60	2.43	1-5% (lowest scores)	Santa Cruz	3971	10.05	65.05	24.91	10.73	81.77	0.93	0	2.19	4.38
6087122300	35.94	69.04	65-70%	Santa Cruz	3796	7.56	66.15	26.29	26.42	67.91	0.42	0.47	1.95	2.82
6087122400	17.02	30.53	30-35%	Santa Cruz	7247	1.99	74.31	23.71	19.48	74.43	0.33	0	2.06	3.7
6087122500	27.00	52.99	50-55%	Santa Cruz	6988	16.37	76.1	7.53	79.45	15.57	0.62	0	0.7	3.66
6087123100	23.04	44.62	40-45%	Santa Cruz	3193	16.1	73.35	10.55	65.42	30.19	0	0.09	1.94	2.35
6087123300	12.25	18.61	15-20%	Santa Cruz	1479	9.94	82.15	7.91	56.39	41.24	1.22	0	1.15	0
6089010100	32.33	63.02	60-65%	Shasta	1658	5.13	79.43	15.44	10.98	76.72	3.68	2.23	2.17	4.22
6089010200	25.13	49.00	45-50%	Shasta	2325	10.02	68.82	21.16	3.53	88.17	5.94	0	1.38	0.99
6089010300	21.60	41.29	40-45%	Shasta	4329	14.16	70.92	14.92	12.24	75.19	2.36	5.38	2.52	2.31
6089010400	17.50	31.51	30-35%	Shasta	4266	9.96	73.75	16.29	11.74	83.94	0.7	2.3	0.96	0.35
6089010500	25.64	50.21	50-55%	Shasta	5812	9.91	78.92	11.17	10.46	81.69	1.58	1.84	2.44	1.98
6089010601	7.60	7.87	5-10%	Shasta	2297	12.41	63.65	23.94	7.44	83.98	0.39	0	3.96	4.22
6089010602	16.62	29.39	25-30%	Shasta	5279	12.16	65.69	22.14	8.3	77.34	0.74	3.07	8.66	1.89
6089010603	16.94	30.32	30-35%	Shasta	1477	9.07	67.5	23.43	2.57	79.01	1.35	9.14	6.09	1.83
6089010702	10.69	14.62	10-15%	Shasta	3559	9.24	71.4	19.36	5.34	87.47	0	1.97	1.18	4.05
6089010703	18.98	35.07	35-40%	Shasta	3242	9.28	65.3	25.42	4.04	81.99	4.32	0.99	4.13	4.53
6089010704	14.67	24.70	20-25%	Shasta	3956	12.11	63.65	24.24	11.53	73.33	0.03	5.01	5.36	4.75
6089010803	14.98	25.50	25-30%	Shasta	5970	20.97	65.64	13.38	11.79	71.79	3.05	1.93	10.54	0.9
6089010804	6.78	6.32	5-10%	Shasta	2660	5.56	74.77	19.66	7.67	80.45	0.23	0.26	8.12	3.27
6089010805	12.28	18.70	15-20%	Shasta	4927	13.23	68.4	18.37	12.36	82.24	0.1	0.3	2.88	2.11
6089010806	18.65	34.35	30-35%	Shasta	2803	9.63	67.32	23.05	10.06	82.59	0	4.6	0.86	1.89
6089010807	9.97	12.85	10-15%	Shasta	4643	9.11	66.12	24.77	8.72	84.6	0.67	0	2.91	3.1
6089010900	33.27	64.49	60-65%	Shasta	4043	11.9	65.17	22.93	15.19	62.63	4.43	5	10.73	2.03
6089011001	7.75	8.08	5-10%	Shasta	1785	13.11	66.67	20.22	8.4	82.52	0	0	2.18	6.89
6089011002	24.56	47.88	45-50%	Shasta	5068	11.03	66.85	22.12	15.02	75.63	0.28	0.65	4.3	4.12
6089011100	14.51	24.37	20-25%	Shasta	3176	15.08	62.91	22.01	5.01	88.41	0.66	1.76	0.5	3.65
6089011209	24.66	48.10	45-50%	Shasta	6545	15.42	71.2	13.38	20.03	56.91	1.83	1.51	10.24	9.47
6089011300	23.43	45.46	45-50%	Shasta	4905	11.11	76.72	12.17	9.97	72.6	3.2	2.71	2.02	9.5
6089011401	10.31	13.73	10-15%	Shasta	4026	12.37	69	18.63	8.2	81.25	0.02	3.18	2.11	5.24
6089011402	6.08	4.87	1-5% (lowest scores)	Shasta	3426	11.15	70.11	18.74	13.81	72.59	0.03	2.39	8.09	3.09
6089011403	12.31	18.75	15-20%	Shasta	2885	16.01	71.2	12.79	4.02	80.24	0.94	0.28	7.04	7.49
6089011500	21.68	41.46	40-45%	Shasta	5672	11.51	62.43	26.06	5.69	91.22	0.04	0	2.43	0.62
6089011600	21.17	40.34	40-45%	Shasta	3707	13.03	66.06	20.91	8.71	76.48	2.13	2.13	5.77	4.77
6089011701	11.63	16.88	15-20%	Shasta	2405	16.84	64.03	19.13	4.95	77.17	0.29	3.95	2.95	10.69
6089011702	27.66	54.24	50-55%	Shasta	3479	15.18	68.58	16.24	9.74	83.41	1.52	3.45	0.03	1.84
6089011703	20.45	38.54	35-40%	Shasta	3326	15.03	69.12	15.84	15.24	76.01	2.19	2.25	0.39	3.91
6089011801	6.26	5.24	5-10%	Shasta	2245	6.82	65.52	27.66	7.13	87.26	0.62	1.07	2.85	1.07
6089011802	9.56	11.85	10-15%	Shasta	2615	8.49	67.07	24.44	6.16	84.78	1.22	0.84	3.48	3.52
6089011803	12.97	20.47	20-25%	Shasta	2681	10.52	63.45	26.04	7.91	89.41	0.07	0.26	0.26	2.09
6089011900	9.44	11.55	10-15%	Shasta	4384	8.35	67.5	24.16	5.22	86.02	0.5	1.82	0.59	5.84

6089012000	25.30	49.45	45-50%	Shasta	4678	17.34	70.22	12.44	13.17	73.6	0.26	5.17	3.47	4.34
6089012101	23.85	46.36	45-50%	Shasta	4562	16.92	68.76	14.31	15.04	75.43	3.18	2.06	1.71	2.59
6089012102	23.70	45.92	45-50%	Shasta	2097	12.11	60.32	27.56	5.39	81.59	0.95	1.86	7.06	3.15
6089012200	22.92	44.28	40-45%	Shasta	6073	18.59	66.87	14.54	12.45	82.88	0.03	1.2	0.92	2.52
6089012301	27.99	54.94	50-55%	Shasta	2580	8.41	69.22	22.36	33.18	62.44	1.01	3.37	0	0
6089012302	9.48	11.65	10-15%	Shasta	5299	9.17	68.64	22.19	11.59	84.17	0	0.94	0.04	3.26
6089012303	10.91	15.25	15-20%	Shasta	4042	10.86	69.5	19.64	6.63	87.36	0.45	1.73	2.03	1.81
6089012400	19.09	35.38	35-40%	Shasta	3575	6.88	67.5	25.62	5.54	86.74	0.08	1.31	1.37	4.95
6089012500	17.33	31.11	30-35%	Shasta	1670	6.95	64.97	28.08	5.21	81.98	0.48	2.16	3.77	6.41
6089012601	11.57	16.78	15-20%	Shasta	5123	10.54	64.4	25.06	5.95	88.03	0.66	3.38	0.33	1.64
6089012603	12.69	19.63	15-20%	Shasta	4175	6.04	60.62	33.34	5.56	89.46	0.84	1.15	0.91	2.08
6089012604	10.92	15.28	15-20%	Shasta	2107	5.84	62.65	31.51	8.21	83.06	0.52	5.08	0.05	3.08
6089012701	21.24	40.43	40-45%	Shasta	4881	15.86	64.13	20.02	8.09	82.44	1.04	2.19	1.8	4.43
6089012702	18.51	33.96	30-35%	Shasta	2774	7.71	61.1	31.18	13.3	78.3	0.18	5.7	0.25	2.27
6091010000	18.28	33.46	30-35%	Sierra	3040	9.01	61.64	29.34	10.66	87.57	0.07	0.95	0	0.76
6093000100	18.57	34.13	30-35%	Siskiyou	1076	17.75	64.13	18.12	62.73	36.34	0.65	0	0	0.28
6093000200	17.18	30.74	30-35%	Siskiyou	1711	12.86	68.91	18.23	38.05	57.1	0.76	2.69	0.47	0.94
6093000300	15.87	27.51	25-30%	Siskiyou	3939	8.17	66.01	25.82	9.75	80.32	0.18	3.5	1.96	4.29
6093000400	16.31	28.58	25-30%	Siskiyou	656	10.67	56.1	33.23	5.95	88.41	0	2.29	0	3.35
6093000500	16.40	28.81	25-30%	Siskiyou	1834	10.58	65.92	23.5	11.34	58.56	1.15	14.34	1.04	13.58
6093000600	15.50	26.68	25-30%	Siskiyou	1733	12.64	57.99	29.37	6.69	80.5	0	2.42	5.65	4.73
6093000701	18.77	34.67	30-35%	Siskiyou	3777	12.1	61.5	26.4	5.22	86.31	0.11	0.87	3.26	4.24
6093000702	29.51	57.85	55-60%	Siskiyou	4436	16.57	64.77	18.67	16.91	66.01	2.61	5.93	0.45	8.09
6093000703	14.21	23.55	20-25%	Siskiyou	3354	16.91	61.18	21.91	7.66	77.43	0.09	3.07	3.22	8.53
6093000800	11.37	16.30	15-20%	Siskiyou	3625	10.01	63.01	26.98	3.53	79.14	0.72	9.02	0.55	7.03
6093000900	25.61	50.14	50-55%	Siskiyou	7510	9.36	68.24	22.4	15.33	71.6	5.79	1.33	3.49	2.46
6093001000	20.83	39.62	35-40%	Siskiyou	6544	12.47	59.26	28.27	7.93	88.88	0.76	0	0.6	1.83
6093001100	20.02	37.57	35-40%	Siskiyou	2012	13.42	59.89	26.69	14.81	76.84	0.05	1.94	2.29	4.08
6093001200	19.51	36.25	35-40%	Siskiyou	1261	7.45	57.41	35.13	7.45	87.79	0.08	1.59	0	3.09
6095250103	28.19	55.31	55-60%	Solano	4873	12.25	69.9	17.85	19.27	20.62	23.33	0	32.08	4.7
6095250104	12.66	19.57	15-20%	Solano	2233	6.9	68.56	24.54	9.67	24.14	8.64	0.94	46.13	10.48
6095250105	23.08	44.73	40-45%	Solano	6655	8.93	68.37	22.7	13.06	20.57	9.45	0.27	51.57	5.08
6095250106	14.72	24.82	20-25%	Solano	4541	10.17	75.05	14.78	7.42	25.94	17.24	0	41.64	7.75
6095250200	22.16	42.46	40-45%	Solano	4355	9.97	73.8	16.23	23.88	32.54	16.12	0.09	21.79	5.58
6095250300	33.15	64.32	60-65%	Solano	3038	11.95	67.81	20.24	24.88	28.41	20.67	0	22.02	4.02
6095250400	29.57	57.94	55-60%	Solano	3002	10.79	75.45	13.76	26.05	53.86	2.6	0	8.66	8.83
6095250501	22.73	43.85	40-45%	Solano	2189	12.43	76.7	10.87	33.94	36.96	18.04	0	4.75	6.3
6095250502	21.53	41.16	40-45%	Solano	3578	8.89	72.41	18.7	28.73	23.56	10.34	0	24.51	12.86
6095250601	29.77	58.25	55-60%	Solano	5289	14.62	75.5	9.89	46.89	17.7	20.63	0	10.4	4.39
6095250604	17.84	32.36	30-35%	Solano	4017	8.12	73.61	18.27	13.44	29.35	16.6	0	34.98	5.63
6095250605	18.31	33.51	30-35%	Solano	3630	6.78	72.64	20.58	11.74	32.04	18.93	0	35.12	2.18
6095250701	65.12	97.87	95-100% (highest scores)	Solano	3529	12.52	75.18	12.3	46.56	17.51	21.03	0	9.55	5.36
6095250801	48.52	86.18	85-90%	Solano	4135	9.87	77.73	12.41	20.73	24.89	31.85	0	18.7	3.85
6095250900	57.13	93.97	90-95%	Solano	2654	22.19	62.81	15	10.66	19.14	50.08	0	12.96	7.16
6095251000	41.93	77.96	75-80%	Solano	2654	11.76	76.45	11.79	42.54	37.6	9.5	0.87	8.52	0.98
6095251100	39.01	73.51	70-75%	Solano	3124	11.33	76.44	12.23	48.66	16.97	25.22	0.51	5.86	2.78
6095251200	41.92	77.92	75-80%	Solano	3663	9.77	78.16	12.07	46	21.68	12.69	0	14.85	4.78
6095251300	30.70	60.12	60-65%	Solano	2969	11.11	69.65	19.23	24.65	46.82	6.8	0.3	12.93	8.49
6095251400	30.48	59.61	55-60%	Solano	5899	8.19	75.56	16.26	26.97	43.72	13.7	0.34	11.11	4.17
6095251500	41.33	77.16	75-80%	Solano	4326	18.45	73.69	7.86	38.97	18.96	30.77	0	4.23	7.07
6095251600	40.13	75.18	75-80%	Solano	2580	12.02	78.8	9.19	33.1	28.49	27.98	0	4.15	6.28
6095251701	36.14	69.43	65-70%	Solano	3211	11.09	72.94	15.98	28	36.87	20.49	0.16	12.3	2.18
6095251702	22.35	42.93	40-45%	Solano	2623	8.62	79.37	12.01	22	15.97	28.52	0	28.78	4.73
6095251802	52.66	90.65	90-95%	Solano	2770	13.21	67.62	19.17	38.12	13.79	29.49	0	13.72	4.87
6095251803	38.38	72.77	70-75%	Solano	4846	16.01	71.87	12.11	46.31	14.8	15.66	0.12	21.02	2.08
6095251804	17.79	32.21	30-35%	Solano	3485	8.61	74.15	17.25	12.48	17.56	18.74	0	44.51	6.71
6095251901	42.35	78.52	75-80%	Solano	5119	12.54	66.61	20.84	21.63	17.21	27.1	0	29.65	4.41
6095251902	41.76	77.74	75-80%	Solano	6173	15.42	71.39	13.19	43.03	10.21	12.38	0	28.35	6.04

6095251903	32.45	63.22	60-65%	Solano	5963	14.09	70.72	15.19	23.51	9.99	38.29	0	24.44	3.77
6095252000	17.98	32.74	30-35%	Solano	4739	9.26	62.14	28.59	13.13	72.21	1.18	0	6.92	6.56
6095252102	22.35	42.89	40-45%	Solano	3900	9.54	70.97	19.49	16.33	66.1	0.15	0	5.69	11.72
6095252103	16.36	28.69	25-30%	Solano	5753	9.59	70.26	20.15	12.39	23.34	17.23	0	36.33	10.71
6095252104	16.12	28.20	25-30%	Solano	5659	12.55	75.01	12.44	12.26	49.44	7.4	0	20.62	10.27
6095252105	10.53	14.25	10-15%	Solano	3305	8.05	73.28	18.67	10.89	65.05	0.88	0	16.58	6.6
6095252106	10.29	13.70	10-15%	Solano	4186	11.13	67.7	21.17	9.99	70.19	2.44	0	12.44	4.95
6095252107	10.13	13.25	10-15%	Solano	3739	8.91	71.17	19.93	13.93	70.18	3.26	0	7.06	5.56
6095252108	15.01	25.58	25-30%	Solano	3153	9.74	70.92	19.35	12.08	68.13	6.66	0	8.56	4.57
6095252201	12.93	20.36	20-25%	Solano	9421	11.64	73.04	15.32	12.38	48.21	7.79	0.14	26.05	5.43
6095252202	14.66	24.68	20-25%	Solano	11383	12.48	75.5	12.02	19.75	30.84	10.15	0.84	31.7	6.71
6095252305	16.16	28.33	25-30%	Solano	5336	9.33	74.83	15.84	12.35	57.25	6.54	0	18.27	5.58
6095252306	15.21	26.05	25-30%	Solano	3353	9.42	68.18	22.4	26.22	48.88	9.81	0	9.39	5.7
6095252310	5.50	3.86	1-5% (lowest scores)	Solano	2913	10.06	62.41	27.53	8.82	54.89	9.2	0	19.12	7.96
6095252311	9.37	11.33	10-15%	Solano	4312	10.46	75.02	14.52	18.23	34.74	18.39	0	19.62	9.02
6095252312	13.10	20.75	20-25%	Solano	4038	15.3	73.18	11.52	23.9	37.25	13.47	0	17.8	7.58
6095252313	18.88	34.90	30-35%	Solano	5627	12.92	60.74	26.34	12.76	47.2	13.7	0	20.36	5.97
6095252314	19.77	36.90	35-40%	Solano	4221	12.06	74.41	13.53	28.52	36.2	12.79	0	16.37	6.11
6095252315	9.14	10.92	10-15%	Solano	4035	9.32	71.28	19.41	17.89	37.84	14.97	1.31	22.43	5.55
6095252316	18.28	33.45	30-35%	Solano	3498	12.35	74.19	13.46	17.52	23.04	14.95	0.91	39.14	4.43
6095252317	24.64	48.06	45-50%	Solano	10131	13.11	78.16	8.74	19.06	28.41	15.05	0.11	28.2	9.17
6095252401	39.10	73.64	70-75%	Solano	4705	10.67	79.17	10.16	49.71	21.66	15.96	0	8.29	4.38
6095252402	46.89	84.28	80-85%	Solano	5549	16.45	76.84	6.7	47.27	20.96	10.04	1.59	14.38	5.77
6095252501	32.87	63.79	60-65%	Solano	2816	19.39	69.99	10.62	56.04	23.4	15.87	0	3.73	0.96
6095252502	41.67	77.58	75-80%	Solano	2106	14.1	79.01	6.89	19.66	34.19	23.36	0	7.27	15.53
6095252604	37.31	71.04	70-75%	Solano	3900	8.9	80.03	11.08	35.59	24.87	19.51	0	13.85	6.18
6095252605	34.60	66.89	65-70%	Solano	6226	17.6	72.66	9.73	45.23	17.99	19.76	1.27	12.06	3.69
6095252606	30.70	60.11	60-65%	Solano	5465	14.69	73.56	11.75	49.48	17.22	19.65	0.09	10.32	3.24
6095252607	31.62	61.67	60-65%	Solano	3898	19.78	73.94	6.29	58.9	17.06	13.42	0	5.95	4.67
6095252608	26.90	52.85	50-55%	Solano	4160	20.63	71.44	7.93	41.71	18.25	25.53	1.13	10.7	2.69
6095252610	19.44	36.02	35-40%	Solano	3134	12.32	75.62	12.06	33.92	29.32	16.21	0	9.64	10.91
6095252611	21.33	40.65	40-45%	Solano	4011	21.57	71.9	6.53	45.05	14.46	20.24	1.27	12.89	6.08
6095252702	34.56	66.82	65-70%	Solano	6598	12.58	74.78	12.64	23.95	28.05	16.04	0	24.67	7.29
6095252703	25.02	48.75	45-50%	Solano	4437	17.17	72.98	9.85	37.03	15.28	18.01	1.04	25.67	2.97
6095252704	17.79	32.20	30-35%	Solano	5410	10.81	77.39	11.79	19.3	30	25.42	0.17	19.04	6.08
6095252705	16.50	29.08	25-30%	Solano	5937	10.11	75.78	14.11	24.93	28.28	22.99	0.77	16.42	6.6
6095252706	20.48	38.70	35-40%	Solano	4087	14.9	74.21	10.89	26.77	25.23	19.7	0	22.39	5.92
6095252707	25.80	50.61	50-55%	Solano	5233	9.4	75.73	14.87	30.65	35.3	19.22	0.11	8.21	6.5
6095252801	14.90	25.25	25-30%	Solano	3014	34.27	65.73	0	15.86	54.61	14.7	0	8.66	6.17
6095252802	14.66	24.67	20-25%	Solano	938	21.22	78.78	0	18.44	52.56	17.7	0	5.23	6.08
6095252903	18.69	34.49	30-35%	Solano	3857	8.66	63.31	28.03	11.28	79.36	1.17	0.36	4.87	2.96
6095252904	28.57	56.01	55-60%	Solano	7116	12.17	72.05	15.78	24.66	47.15	9.57	0.7	13.94	3.98
6095252908	15.33	26.26	25-30%	Solano	3993	16.78	72.53	10.69	16.58	58.18	5.53	0.28	11.42	8.01
6095252909	20.92	39.85	35-40%	Solano	3471	12.22	82.48	5.3	21.75	59	6.74	0	4.18	8.33
6095252910	8.27	9.09	5-10%	Solano	5610	11.18	77.36	11.46	26.65	51.27	5.69	0.7	7.25	8.45
6095252911	20.29	38.19	35-40%	Solano	4818	3.26	40.16	56.58	10.94	74.93	5.4	0.17	6.41	2.16
6095252912	8.23	9.00	5-10%	Solano	5668	11.56	74.61	13.83	18.7	62.49	4.59	0	6.49	7.73
6095252913	12.33	18.81	15-20%	Solano	4856	14.93	76.21	8.86	21.09	55.23	10.52	0	7.16	5.99
6095252914	11.91	17.65	15-20%	Solano	6330	15.15	73.68	11.17	25.02	48.04	10.49	0.21	9.61	6.64
6095252915	13.76	22.39	20-25%	Solano	5326	17.91	71.25	10.83	22.89	40.63	8.37	0	18.66	9.44
6095253000	NA	NA	NA	Solano	6720	0	88.94	11.06	23.38	22.32	43.96	1.82	5.73	2.8
6095253101	28.61	56.10	55-60%	Solano	5512	10.58	74.02	15.4	33.69	55.03	1.09	0.33	3.66	6.2
6095253105	18.20	33.25	30-35%	Solano	6584	15.54	73.89	10.57	28.69	40.55	14.61	0.67	6.46	9.02
6095253106	11.15	15.80	15-20%	Solano	3675	10.39	80.82	8.79	21.17	54.69	11.35	0	9.12	3.67
6095253107	23.90	46.56	45-50%	Solano	6141	13.74	69.92	16.33	32.68	45.43	7.6	0.33	9.78	4.17
6095253108	20.97	39.95	35-40%	Solano	4747	17.48	70.28	12.24	26.14	41.67	6.19	0.21	13.39	12.39
6095253201	9.07	10.77	10-15%	Solano	4788	12.43	64.16	23.41	14.29	72.43	4.01	1.65	1.21	6.41
6095253203	14.97	25.47	25-30%	Solano	4123	15.23	70.94	13.82	23.28	60.22	7.59	0	3.88	5.02

6095253204	22.08	42.30	**40-45%**	Solano	7286	12.65	78.04	9.31	46.56	38.09	5.97	0	4.76	4.63
6095253205	26.65	52.34	**50-55%**	Solano	2971	11.54	79.1	9.36	30.63	52.1	3.77	0	7.43	6.06
6095253206	18.13	33.02	**30-35%**	Solano	3236	11.9	79.76	8.34	11.5	65.23	0.62	0	16.44	6.21
6095253300	27.86	54.66	**50-55%**	Solano	2648	11.03	72.58	16.39	40.67	53.97	0.38	2.42	0.98	1.59
6095253402	36.89	70.39	**70-75%**	Solano	8343	11.39	72.32	16.29	49.8	36.46	2.03	0	6.88	4.83
6095253403	24.21	47.19	**45-50%**	Solano	4991	10.92	72.67	16.41	34.48	55.76	0.18	0	5.25	4.33
6095253404	23.74	46.03	**45-50%**	Solano	6894	15.2	77.13	7.67	38.4	49.62	2.84	0.54	3.66	4.95
6095253500	41.76	77.76	**75-80%**	Solano	10676	5.07	50.74	44.19	20.86	64.35	6.67	0.2	6.41	1.52
6095980000	NA	NA	**NA**	Solano	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
6097150100	11.82	17.39	**15-20%**	Sonoma	2631	5.66	68.91	25.43	15.55	83.16	0	0	0.87	0.42
6097150202	9.77	12.41	**10-15%**	Sonoma	4927	5.42	68.85	25.74	22.29	65.35	0.55	0	6.68	5.13
6097150203	10.46	14.01	**10-15%**	Sonoma	4561	4.85	59.15	36	16.79	78.23	0.33	0	2.72	1.93
6097150204	9.10	10.87	**10-15%**	Sonoma	3633	10.54	59.76	29.7	17.67	78.89	0	0.22	1.07	2.15
6097150303	6.46	5.64	**5-10%**	Sonoma	4493	3	47.16	49.83	7.59	86.67	0	0	0.65	5.1
6097150304	6.69	6.10	**5-10%**	Sonoma	5610	11.12	67.61	21.27	29.27	66.63	2.46	0	1.64	0
6097150305	17.68	32.00	**30-35%**	Sonoma	6183	16.46	74.61	8.93	63.5	26.65	0.6	0	0.45	8.8
6097150306	16.24	28.48	**25-30%**	Sonoma	4225	7.31	71.64	21.04	27.91	62.27	0	0	2.2	7.62
6097150500	5.83	4.36	**1-5% (lowest scores)**	Sonoma	4782	9.43	64.62	25.95	5.29	83.1	0.42	0.84	3.01	7.34
6097150601	17.92	32.51	**30-35%**	Sonoma	4413	13.28	73.24	13.48	30.36	57.24	1.9	0	5.62	4.87
6097150602	8.09	8.72	**5-10%**	Sonoma	4271	10.42	71.11	18.47	20.42	70.45	0	0	4.92	4.21
6097150603	18.31	33.52	**30-35%**	Sonoma	7691	8.19	69.47	22.34	30.01	64.11	0.52	0.05	2.47	2.83
6097150607	9.06	10.70	**10-15%**	Sonoma	5145	12.73	74.62	12.65	14.31	69.25	1.57	0.02	8.78	6.06
6097150609	13.91	22.78	**20-25%**	Sonoma	5033	13.49	62.23	24.28	23.7	64.91	2.23	0	5.35	3.81
6097150610	8.10	8.76	**5-10%**	Sonoma	3983	10.39	74.27	15.34	20.79	64.47	0.45	0.6	6.63	7.05
6097150611	16.89	30.18	**30-35%**	Sonoma	4147	12.47	74.83	12.71	24.28	64.55	2.12	0	5.4	3.64
6097150612	14.69	24.76	**20-25%**	Sonoma	4676	10.14	72.13	17.73	11.12	80.69	0.47	0.36	3.66	3.7
6097150701	30.63	59.92	**55-60%**	Sonoma	4939	6.64	74.69	18.67	26.26	68.5	0.93	0.12	0.91	3.28
6097150702	12.91	20.25	**20-25%**	Sonoma	4915	9.95	70.15	19.9	7.63	82.32	1.18	0.16	4.66	4.05
6097150800	14.47	24.19	**20-25%**	Sonoma	5401	8.81	72.84	18.35	21.44	67.23	0.06	0.24	4.92	6.11
6097150901	26.25	51.41	**50-55%**	Sonoma	5053	14.55	73.12	12.33	31.74	57.11	1.29	0	3.27	6.59
6097150902	13.45	21.56	**20-25%**	Sonoma	3423	12.07	70.23	17.7	10.05	83.23	0.88	0	1.61	4.24
6097151000	15.49	26.63	**25-30%**	Sonoma	3968	6.25	73.14	20.61	14.62	81.5	0	0	2.75	1.13
6097151100	13.71	22.28	**20-25%**	Sonoma	5619	10.7	70.56	18.74	15.27	78.82	1.57	0.43	1.14	2.78
6097151201	20.27	38.16	**35-40%**	Sonoma	7069	12.7	65.29	22.01	25.55	67.92	0.38	0.06	3.95	2.15
6097151203	7.56	7.80	**5-10%**	Sonoma	4460	13.9	67.22	18.88	14.48	79.91	0.27	0	2.25	3.09
6097151204	11.70	17.03	**15-20%**	Sonoma	2987	12.62	72.55	14.83	21.39	72.21	0.4	0	2.61	3.38
6097151301	13.24	21.02	**20-25%**	Sonoma	4970	16.26	73.02	10.72	46.4	39.88	0.68	0	7.46	5.57
6097151305	29.16	57.16	**55-60%**	Sonoma	6038	14.74	74.45	10.81	43.94	51.67	1.26	0	1.92	1.21
6097151306	11.62	16.84	**15-20%**	Sonoma	3841	11.27	70.89	17.83	23.22	64.2	1.69	0	6.64	4.24
6097151307	10.26	13.64	**10-15%**	Sonoma	5783	16.27	69.96	13.76	26.18	63.01	0.61	0	5.48	4.72
6097151308	15.71	27.12	**25-30%**	Sonoma	5119	11.15	66.95	21.9	16.64	72.2	2.21	0	2.27	6.68
6097151309	8.43	9.46	**5-10%**	Sonoma	5737	9.81	73.35	16.84	16.05	71.78	1.32	0	7.74	3.1
6097151310	13.75	22.31	**20-25%**	Sonoma	5716	4.16	88.66	7.17	23.55	58.47	5.37	0	10.9	1.71
6097151311	11.05	15.60	**15-20%**	Sonoma	6575	5.52	85.55	8.93	20.06	63.41	4.76	0	10.28	1.49
6097151401	22.32	42.79	**40-45%**	Sonoma	8050	13.71	78.97	7.32	41.84	38.8	1.8	1.58	11.93	4.06
6097151402	39.15	73.69	**70-75%**	Sonoma	9853	11.21	79.4	9.39	52.33	35.84	3.33	1.52	5.92	1.07
6097151502	11.71	17.11	**15-20%**	Sonoma	7069	10.88	66.63	22.49	9.93	80.72	2.94	0.58	3.96	1.87
6097151503	4.15	1.75	**1-5% (lowest scores)**	Sonoma	3448	6.12	62.04	31.84	5.02	86.22	1.42	0.29	4.93	2.12
6097151504	4.92	2.92	**1-5% (lowest scores)**	Sonoma	3554	6.84	68.88	24.28	9.93	82.84	0.23	0	5.15	1.86
6097151601	4.38	2.11	**1-5% (lowest scores)**	Sonoma	3013	0.93	26.45	72.62	7.63	86.29	0.23	0.33	4.22	1.29
6097151602	4.96	2.95	**1-5% (lowest scores)**	Sonoma	2985	2.61	26.83	70.55	2.78	92.76	0	0	3.99	0.47
6097151700	11.96	17.81	**15-20%**	Sonoma	7457	12.44	65.35	22.21	15.8	68.51	0.05	0.56	12.35	2.72
6097151800	12.84	20.06	**20-25%**	Sonoma	4848	8.33	72.3	19.37	9.69	76.98	6.31	0	1.22	5.8
6097151900	20.16	37.92	**35-40%**	Sonoma	3286	11.05	72.25	16.71	27.33	60.68	1.98	1.13	4.63	4.26
6097152000	24.25	47.33	**45-50%**	Sonoma	1980	11.01	80.05	8.94	28.18	58.33	3.99	0.2	3.59	5.71
6097152100	24.14	47.06	**45-50%**	Sonoma	3136	8.32	80.45	11.22	20.06	66.49	5.33	0.67	4.78	2.68
6097152201	14.53	24.43	**20-25%**	Sonoma	3937	13.69	76.81	9.5	25.55	60.33	4.75	3.2	1.6	4.57
6097152202	8.45	9.53	**5-10%**	Sonoma	6510	8.79	66.67	24.55	23.93	66.45	0.45	0	5.15	4.02

6097152203	12.12	18.27	15-20%	Sonoma	3535	9.31	69.56	21.13	12.16	73.75	2.72	3.08	1.87	6.42
6097152300	6.23	5.17	5-10%	Sonoma	4115	7.95	66.8	25.25	12.3	82.94	0.05	0.58	1.99	2.14
6097152400	9.02	10.64	10-15%	Sonoma	8367	5.68	63.13	31.19	6.73	78.56	2.09	0.53	8.69	3.41
6097152501	10.42	13.89	10-15%	Sonoma	4352	16.02	72.79	11.19	19.65	66.91	2.32	0.28	7.88	2.96
6097152502	8.23	8.99	5-10%	Sonoma	3782	11.61	65.42	22.98	29.03	57.35	0.32	1.03	7.54	4.73
6097152600	6.43	5.57	5-10%	Sonoma	8131	10.71	66.97	22.32	8.4	81.85	1.71	0	4.52	3.52
6097152701	15.18	25.97	25-30%	Sonoma	4804	6.79	69.46	23.75	25.27	66.78	0	0	3.08	4.87
6097152702	20.80	39.56	35-40%	Sonoma	5342	12.75	73.42	13.83	29.95	59.08	1.39	0.3	3.01	6.27
6097152801	22.71	43.81	40-45%	Sonoma	4631	12.78	75.6	11.62	36.49	55.54	0	0.84	3.8	3.33
6097152802	23.54	45.61	45-50%	Sonoma	7564	15.82	73.53	10.64	55.24	36.83	2.74	0	2.74	2.46
6097152903	18.61	34.24	30-35%	Sonoma	5488	15.82	74.74	9.44	56.87	31.51	2.7	0	4.26	4.66
6097152904	11.84	17.49	15-20%	Sonoma	5459	10.4	75.23	14.36	29.38	58.12	2.05	0.05	5.28	5.11
6097152905	14.35	23.95	20-25%	Sonoma	4458	11.24	74.32	14.45	28.17	60.79	3.41	1.23	4.73	1.66
6097152906	9.87	12.59	10-15%	Sonoma	5576	11.96	73.31	14.72	21	70.5	2.64	0	3.52	2.35
6097153001	26.18	51.30	50-55%	Sonoma	7147	13.04	76.23	10.73	44.2	43.77	0.55	0.55	6.69	4.25
6097153002	26.04	51.01	50-55%	Sonoma	6864	16.33	75.52	8.14	51.05	36.36	3.31	0.41	4.43	4.44
6097153003	24.40	47.63	45-50%	Sonoma	5669	15.21	72.83	11.96	39.94	48.99	0.79	1.36	5.5	3.42
6097153005	17.45	31.38	30-35%	Sonoma	7207	9.2	73.48	17.32	27.68	62.05	0.24	0	6.48	3.55
6097153006	12.88	20.16	20-25%	Sonoma	8199	13.05	69.3	17.65	34.76	53.86	3.4	0.01	3.15	4.81
6097153102	31.18	61.01	60-65%	Sonoma	5976	12.48	81.07	6.44	69.39	17.7	5.44	1.26	5.14	1.07
6097153103	24.60	47.97	45-50%	Sonoma	4507	15.95	72.04	12	58.84	28.22	1.18	1.8	7.79	2.17
6097153104	40.08	75.04	75-80%	Sonoma	3949	19.42	74.58	6	66.35	24.21	2.05	1.39	0.99	5.01
6097153200	38.43	72.83	70-75%	Sonoma	8327	16.98	75.39	7.63	54.75	32.27	3.63	0	6.14	3.22
6097153300	31.70	61.84	60-65%	Sonoma	12385	8.74	78.41	12.85	43.25	39.56	3.12	0.58	8.43	5.06
6097153401	15.21	26.06	25-30%	Sonoma	6373	8.36	70.48	21.15	8.33	80.5	0.66	0	2.68	7.83
6097153403	10.53	14.22	10-15%	Sonoma	3910	9.85	68.62	21.53	12.74	78.62	2.99	0	3.61	2.05
6097153404	5.73	4.16	1-5% (lowest scores)	Sonoma	4382	4.66	65.7	29.64	7.35	86.72	0.27	0.11	0.87	4.68
6097153501	7.63	7.97	5-10%	Sonoma	4816	7.79	65.57	26.64	10.3	85.88	1.18	0.06	1.54	1.04
6097153502	7.16	7.11	5-10%	Sonoma	4266	7.92	61.63	30.45	12.07	82.3	0	0	1.88	3.75
6097153600	11.73	17.17	15-20%	Sonoma	6265	8.91	67.13	23.96	17.02	77.67	0.11	0.34	0.52	4.36
6097153703	12.95	20.44	20-25%	Sonoma	3506	6.5	69.57	23.93	6.99	84.85	1.57	0.37	2.09	4.14
6097153704	13.26	21.09	20-25%	Sonoma	4071	6.48	67.72	25.79	11.52	83.69	0.1	0	1.5	3.19
6097153705	10.87	15.19	15-20%	Sonoma	3936	4.8	70.5	24.7	12.4	79.78	0.23	0.2	3.05	4.34
6097153706	12.60	19.42	15-20%	Sonoma	4440	6.67	67.91	25.43	8.31	83.09	0	1.73	0.92	5.95
6097153801	14.13	23.37	20-25%	Sonoma	10263	13.62	75.66	10.72	37.78	54.69	1.07	1	3.54	1.92
6097153804	13.99	22.97	20-25%	Sonoma	3534	14.77	71.11	14.12	34.78	55.32	0	0.42	1.13	8.35
6097153806	8.01	8.54	5-10%	Sonoma	3244	11.78	67.32	20.9	29.38	66.03	0	1.48	0.77	2.34
6097153807	4.77	2.69	1-5% (lowest scores)	Sonoma	3459	6.71	71.87	21.42	15.09	71.44	1.91	4.42	3.32	3.82
6097153808	22.80	43.95	40-45%	Sonoma	4393	9.99	71.93	18.07	43.82	48.42	0.64	1.3	2.57	3.26
6097153809	10.08	13.14	10-15%	Sonoma	4388	8.87	72.86	18.28	29.85	58.82	0	0	4.69	6.63
6097153901	12.26	18.65	15-20%	Sonoma	4966	6.75	66.85	26.4	17.4	71.81	0.34	0	2.64	7.81
6097153902	19.48	36.17	35-40%	Sonoma	4617	12.67	70.59	16.74	43.19	55.06	0	0	1.06	0.69
6097153903	8.69	9.91	5-10%	Sonoma	3876	5.42	69.81	24.77	25.75	71.03	0	0.77	0.72	1.73
6097154000	12.75	19.78	15-20%	Sonoma	2606	6.83	57.98	35.19	25.13	70.11	0	1.19	1.8	1.77
6097154100	16.82	29.98	25-30%	Sonoma	3644	9.06	67.97	22.97	27.22	66.58	0	0	1.81	4.39
6097154201	29.59	58.01	55-60%	Sonoma	3959	17.13	69.59	13.29	48.37	47.18	0.08	2.12	2.04	0.2
6097154202	12.89	20.21	20-25%	Sonoma	6050	11.16	65.06	23.79	18.55	71.47	1.09	0.79	5.32	2.78
6097154302	9.99	12.88	10-15%	Sonoma	3848	5.48	55.02	39.5	4	82.54	1.64	1.3	1.3	9.23
6097154303	5.46	3.78	1-5% (lowest scores)	Sonoma	1528	3.99	42.02	53.99	14.27	82.2	0	0	2.94	0.59
6097154304	12.92	20.32	20-25%	Sonoma	2455	7.54	64.64	27.82	9.53	78.7	0	4.52	3.22	4.03
6099000101	31.03	60.68	60-65%	Stanislaus	5330	8.14	68.57	23.28	18.33	75.08	0.17	0.09	1.37	4.95
6099000102	30.08	58.83	55-60%	Stanislaus	4136	9.09	72	18.91	27.66	67.26	0	0.24	3.97	0.87
6099000201	33.27	64.50	60-65%	Stanislaus	5821	11.46	78.2	10.34	15.94	78.53	0	0.26	1.27	4
6099000202	42.57	78.74	75-80%	Stanislaus	7963	22.42	64.99	12.6	34.52	57.33	0.2	0.31	4.67	2.96
6099000203	41.05	76.70	75-80%	Stanislaus	10201	13.13	73.82	13.06	42.6	54.19	0.51	0.91	0.61	1.18
6099000301	41.90	77.86	75-80%	Stanislaus	2065	15.11	69.98	14.92	62.71	33.85	0	0	0	3.44
6099000302	44.08	80.96	80-85%	Stanislaus	2578	14.35	70.71	14.93	54	37.55	2.21	3.53	1.71	1.01
6099000303	30.16	59.04	55-60%	Stanislaus	6138	12.84	76.82	10.35	63.67	27.29	0.98	0.78	4.68	2.61

6099000304	48.02	85.48	85-90%	Stanislaus	5329	16.91	71.89	11.2	70.03	26.05	1.22	0	1.11	1.6
6099000402	36.57	69.97	65-70%	Stanislaus	11695	15.52	74.13	10.35	39.34	47.58	1.88	0	9.5	1.7
6099000403	23.30	45.16	45-50%	Stanislaus	4029	6.25	69.92	23.83	29.41	61.03	3	0	4.59	1.96
6099000404	35.32	67.98	65-70%	Stanislaus	6104	14.97	68.91	16.12	30.11	55.23	0	0	9.11	5.55
6099000501	31.36	61.27	60-65%	Stanislaus	8309	13.89	75.45	10.66	45.01	43.48	0	0	8.58	2.92
6099000503	30.66	60.02	60-65%	Stanislaus	4800	8.83	82.38	8.79	37.4	44.46	7.88	0	6.46	3.81
6099000504	23.16	44.87	40-45%	Stanislaus	8852	11.83	70.47	17.7	28.08	46.87	3.49	0.18	16.23	5.15
6099000505	20.01	37.54	35-40%	Stanislaus	5680	19.89	69.37	10.74	31.09	46.14	3.19	2.5	11.68	5.4
6099000506	21.51	41.15	40-45%	Stanislaus	4092	12.93	67.6	19.48	32.97	56.43	2.22	0.17	6.33	1.88
6099000510	41.15	76.83	75-80%	Stanislaus	8439	12.74	77.73	9.53	48.71	45.92	0	0	4.08	1.29
6099000601	31.44	61.33	60-65%	Stanislaus	4405	12.69	75.01	12.3	43.93	46.83	0.86	0	5.29	3.09
6099000602	44.01	80.84	80-85%	Stanislaus	3111	12.57	77.88	9.55	47.64	37.03	5.14	0	7.39	2.8
6099000801	35.24	67.93	65-70%	Stanislaus	6430	12.58	64.15	23.27	27.67	60.09	4.48	0.26	6.47	1.03
6099000803	52.94	90.83	90-95%	Stanislaus	5060	19.21	66.3	14.49	54.92	21.4	7.89	1.25	11.12	3.42
6099000805	33.21	64.44	60-65%	Stanislaus	6582	16.26	71.7	12.05	44.76	34.72	4.3	3.77	10.58	1.88
6099000806	19.66	36.66	35-40%	Stanislaus	4519	11.82	73.07	15.11	40.58	42.51	7.48	0.51	5.4	3.52
6099000807	31.89	62.22	60-65%	Stanislaus	3700	10.51	68.08	21.41	38.05	43.89	4.92	0.73	10.03	2.38
6099000905	28.97	56.88	55-60%	Stanislaus	5876	10.13	72.07	17.8	31.93	51.48	3.91	0.19	7.66	4.83
6099000906	29.18	57.24	55-60%	Stanislaus	5933	14.7	67.74	17.56	20.41	67.67	0.83	1.37	6.73	3
6099000907	23.28	45.10	45-50%	Stanislaus	3557	16.31	60.22	23.47	29.46	61.99	0.98	0	1.55	6.02
6099000908	26.64	52.32	50-55%	Stanislaus	5468	12.87	71.93	15.2	39.05	48.04	2.83	0.69	4.93	4.44
6099000909	32.39	63.17	60-65%	Stanislaus	5437	14.22	69.49	16.3	32.7	52.35	1.6	0	11.16	2.19
6099000910	31.66	61.71	60-65%	Stanislaus	7549	14.19	73.6	12.21	45.04	39.9	9.1	0.66	1.62	3.68
6099000911	20.48	38.73	35-40%	Stanislaus	4870	14.99	70.49	14.52	27.91	54.54	7.33	0	8.77	1.46
6099000912	22.46	43.20	40-45%	Stanislaus	17392	10.15	77.25	12.6	26.24	46.34	4.55	0.57	19.2	3.09
6099001001	28.21	55.33	55-60%	Stanislaus	6014	9.2	70.97	19.84	31.34	51.65	9.69	0	2.74	4.57
6099001002	26.51	52.02	50-55%	Stanislaus	3284	13.15	73.75	13.09	36.97	53.2	2.89	0.61	4.14	2.19
6099001100	45.46	82.51	80-85%	Stanislaus	4153	11.49	70.65	17.87	35.06	50.76	4.5	0	6.89	2.79
6099001200	37.82	71.80	70-75%	Stanislaus	3889	13.47	73.9	12.63	21.29	67.14	2.6	0	4.75	4.22
6099001300	41.80	77.79	75-80%	Stanislaus	5896	15.64	66.88	17.49	29.94	61.91	1.83	0	3.71	2.61
6099001400	46.97	84.39	80-85%	Stanislaus	6441	12.75	71.99	15.26	21.43	56.39	4.1	1.2	9.7	7.19
6099001500	53.21	91.04	90-95%	Stanislaus	7217	13.33	66.02	20.65	54.19	28.81	3.31	0.47	10.27	2.95
6099001601	50.20	88.10	85-90%	Stanislaus	4857	21.95	69.65	8.4	71.05	12.95	2.9	0	12.33	0.76
6099001603	47.65	85.05	85-90%	Stanislaus	6451	19.84	71.74	8.42	69.17	22.31	2.06	0.19	4.54	1.74
6099001604	40.18	75.29	75-80%	Stanislaus	3809	21.19	70.83	7.98	78.08	8.66	0.74	1.16	7.8	3.57
6099001700	59.47	95.36	95-100% (highest scores)	Stanislaus	2738	19.65	75.09	5.26	75.38	15.67	2.48	0.22	6.06	0.18
6099001800	56.85	93.82	90-95%	Stanislaus	2349	15.58	69.43	14.99	34.31	50.23	7.54	0.68	1.57	5.66
6099001900	35.85	68.89	65-70%	Stanislaus	4833	9.89	73.72	16.39	28.91	59.03	1.9	0.64	7.43	2.09
6099002002	54.44	92.07	90-95%	Stanislaus	4342	12.87	74.16	12.97	62.71	29.99	0.9	0.97	3.2	2.23
6099002004	51.88	89.86	85-90%	Stanislaus	6694	19.2	69.52	11.28	48.91	41.04	2.88	0	3.05	4.12
6099002005	40.45	75.73	75-80%	Stanislaus	4040	19.13	70.62	10.25	44.48	40.15	9.6	0.22	4.06	1.49
6099002006	27.02	53.05	50-55%	Stanislaus	4681	12.5	79.15	8.35	40.21	43.69	4.83	0	9.55	1.73
6099002100	69.16	98.90	95-100% (highest scores)	Stanislaus	3112	18.64	75.32	6.04	72.85	18.89	5.75	2.09	0.22	0.19
6099002200	58.88	95.05	95-100% (highest scores)	Stanislaus	6206	18.29	73.04	8.67	70.43	16.85	5.11	0	4.72	2.88
6099002301	54.79	92.33	90-95%	Stanislaus	8850	20.86	73.39	5.75	80.8	13.14	1.42	0	4.05	0.59
6099002302	59.84	95.61	95-100% (highest scores)	Stanislaus	3759	16.28	74.94	8.78	85.02	11.09	0.08	0	1.86	1.94
6099002401	39.61	74.32	70-75%	Stanislaus	3848	19.75	75.75	4.5	78.72	12.53	5.77	0	2.05	0.94
6099002402	50.62	88.48	85-90%	Stanislaus	5567	18.59	76.61	4.8	89.92	9.63	0	0	0	0.45
6099002501	45.91	83.12	80-85%	Stanislaus	6944	14.3	78.21	7.49	74.16	14.54	0.92	0.65	6.66	3.05
6099002503	45.27	82.29	80-85%	Stanislaus	4848	16.54	75.54	7.92	71.7	24.17	2.6	0	0.85	0.68
6099002504	35.87	68.95	65-70%	Stanislaus	4588	16.5	73.13	10.37	64.89	21.77	7.24	1.26	1.94	2.9
6099002602	47.81	85.26	85-90%	Stanislaus	5703	22.48	69.74	7.79	54.25	35.88	3.96	0.82	1.68	3.4
6099002603	30.87	60.40	60-65%	Stanislaus	3291	14.83	70.13	15.04	47.46	41.48	6.17	1.79	2.47	0.64
6099002604	53.03	90.87	90-95%	Stanislaus	4801	17.56	74.3	8.14	69.42	20.64	1.58	0	6.37	1.98
6099002605	41.37	77.23	75-80%	Stanislaus	3837	15.27	71.7	13.03	56.14	36.46	0	2.24	1.74	3.41
6099002701	30.00	58.67	55-60%	Stanislaus	3935	12.43	76.16	11.41	56.59	32.71	2.13	0	2.36	6.2
6099002702	44.14	81.01	80-85%	Stanislaus	6838	18.32	73.38	8.29	68.05	20.33	4.43	0.41	6.42	0.37
6099002801	31.67	61.75	60-65%	Stanislaus	5823	19.42	71.05	9.53	35.79	56.52	1.03	0.31	3.85	2.51

6099002802	45.96	83.19	80-85%	Stanislaus	6669	13.02	73.17	13.81	52.65	44.86	0.22	0	1.11	1.15
6099002803	28.67	56.28	55-60%	Stanislaus	2864	11.87	64.32	23.81	30.76	59.64	2.58	0	5.73	1.29
6099002901	30.02	58.70	55-60%	Stanislaus	4615	11.48	71.07	17.44	25.63	71.9	0.02	0	0.98	1.47
6099002902	30.56	59.75	55-60%	Stanislaus	8359	18.34	67.39	14.27	30.42	59.28	0.42	1.09	7.42	1.38
6099003001	38.57	72.97	70-75%	Stanislaus	10029	13.97	75	11.03	54.07	18.39	5.47	0.65	18.39	3.03
6099003002	37.62	71.50	70-75%	Stanislaus	7837	17.52	73.98	8.5	73.28	22.93	0.29	0	1.08	2.41
6099003100	54.87	92.44	90-95%	Stanislaus	4161	16.25	70.18	13.58	50.97	43.6	0	1.83	3.6	0
6099003201	31.19	61.04	60-65%	Stanislaus	4806	14.36	74.78	10.86	76.07	17.08	4.52	0	0.67	1.66
6099003202	34.62	66.98	65-70%	Stanislaus	17848	18.2	72.21	9.59	59.3	22.09	6.34	0	10.49	1.78
6099003300	40.84	76.35	75-80%	Stanislaus	6076	11.08	78.54	10.39	67.35	29.08	2.45	0	0.89	0.23
6099003400	38.35	72.72	70-75%	Stanislaus	1661	15.65	73.69	10.66	71.52	27.57	0	0	0.9	0
6099003500	31.19	61.03	60-65%	Stanislaus	12021	17.05	70.28	12.68	68.36	27.92	1.79	0	1.27	0.67
6099003603	51.96	89.99	85-90%	Stanislaus	3382	16.26	63.78	19.96	36.13	57.95	0	0	2.87	3.05
6099003604	31.04	60.72	60-65%	Stanislaus	9218	10.51	75.93	13.56	29.57	64.57	0	0	3.95	1.91
6099003605	33.25	64.46	60-65%	Stanislaus	8068	15.41	71.26	13.34	23.74	62.98	2.65	0	8.52	2.12
6099003606	22.40	43.04	40-45%	Stanislaus	12851	15.28	77.31	7.42	25.05	47.06	5.75	1.98	14.78	5.38
6099003700	75.31	99.70	95-100% (highest scores)	Stanislaus	4669	16.77	73.08	10.15	55.32	38.59	1.16	0	4.43	0.49
6099003802	66.71	98.35	95-100% (highest scores)	Stanislaus	5339	10.19	78.97	10.84	73.57	22.14	2.32	0.24	1.72	0
6099003803	48.09	85.63	85-90%	Stanislaus	3135	16.62	76.68	6.7	70.3	22.23	1.47	0.29	5.42	0.29
6099003804	57.00	93.90	90-95%	Stanislaus	7417	17.23	69.1	13.67	49.67	39.17	1.78	0.46	5.99	2.93
6099003805	43.75	80.47	80-85%	Stanislaus	3098	12.23	80.25	7.52	43.74	45.71	0.81	0	5.94	3.81
6099003904	41.53	77.38	75-80%	Stanislaus	4652	11.93	72.42	15.65	47.57	47.55	0	2.13	1.05	1.7
6099003905	23.91	46.57	45-50%	Stanislaus	4319	14.86	67.42	17.71	24.4	71.64	0.42	0	1.07	2.48
6099003906	36.31	69.60	65-70%	Stanislaus	5404	12.69	74.69	12.62	45.11	47.37	3.48	0.61	1.98	1.44
6099003907	23.81	46.26	45-50%	Stanislaus	7308	10.47	62.53	27	20.13	71.32	0.26	0	4.27	4.02
6099003908	29.72	58.16	55-60%	Stanislaus	2428	16.35	72.65	11	46.75	35.87	7.7	0	4.61	5.07
6099003909	32.34	63.07	60-65%	Stanislaus	5992	7.91	76.23	15.85	33.44	61.52	1.5	0	1.37	2.17
6099004000	39.52	74.18	70-75%	Stanislaus	3880	11.49	72.73	15.77	28.12	64.87	1.16	0	1.13	4.72
6101050101	40.99	76.63	75-80%	Sutter	6878	17.96	65.6	16.44	42.48	35.52	0.95	1.35	14.12	5.58
6101050102	43.42	80.07	80-85%	Sutter	5061	13.85	68.86	17.29	42.56	49.18	0.83	0.45	2.84	4.13
6101050201	45.40	82.46	80-85%	Sutter	3393	16.06	75.1	8.84	40.97	40.82	2.39	0.21	9.13	6.48
6101050202	58.94	95.07	95-100% (highest scores)	Sutter	3608	18.26	72.31	9.42	49.72	42.1	1.97	0.5	2.16	3.55
6101050301	28.24	55.40	55-60%	Sutter	2421	15.24	66.25	18.5	33.33	57.46	0.5	0.29	4.83	3.59
6101050302	52.74	90.71	90-95%	Sutter	5824	13.68	76.39	9.92	61.4	25.81	3.26	0.77	7.7	1.06
6101050401	22.99	44.47	40-45%	Sutter	4665	15.43	70.63	13.93	26.13	48.7	3.99	0.49	16.06	4.63
6101050402	28.87	56.73	55-60%	Sutter	3635	12.35	71.97	15.68	23.6	49.88	0.61	0.61	20.94	4.37
6101050403	21.05	40.07	40-45%	Sutter	3705	14.87	80.16	4.97	22.83	55.38	5.05	0	8.61	8.12
6101050501	39.64	74.37	70-75%	Sutter	6596	13.69	71.15	15.16	25.05	31.49	1.38	0.92	36.22	4.94
6101050503	22.74	43.87	40-45%	Sutter	7019	11.75	74.84	13.41	17	33.84	1.47	0.98	41.73	4.99
6101050504	25.39	49.67	45-50%	Sutter	7242	14.24	70.95	14.82	15.8	42.79	1.24	0.11	30.74	9.32
6101050601	19.48	36.13	35-40%	Sutter	6281	13.72	68.54	17.74	21.32	54.05	0.06	0.88	21.89	1.8
6101050603	19.58	36.45	35-40%	Sutter	4622	10.41	60.26	29.34	8.94	65.14	2.62	0.48	18.04	4.78
6101050604	17.22	30.86	30-35%	Sutter	4354	12.26	68.58	19.15	20.85	55.42	3.26	0.64	12.31	7.51
6101050701	28.83	56.66	55-60%	Sutter	4846	16.38	70.1	13.52	48.76	43.97	0	0.1	4.19	2.97
6101050702	35.80	68.86	65-70%	Sutter	6032	16.45	69.11	14.44	45.44	40.27	3.02	0.85	7.69	2.74
6101050800	20.03	37.64	35-40%	Sutter	3342	9.99	75.73	14.27	14.03	75.4	0	1.86	3.8	4.91
6101050900	31.58	61.60	60-65%	Sutter	1499	12.74	72.72	14.54	42.43	54.24	0.87	0.73	0.2	1.53
6101051000	36.07	69.24	65-70%	Sutter	2598	17.55	67.94	14.51	35.57	53.23	2.35	0.15	7.54	1.15
6101051100	26.75	52.50	50-55%	Sutter	2488	10.69	72.19	17.12	16.08	76.33	0.84	0.44	4.46	1.85
6103000100	23.40	45.39	45-50%	Tehama	4948	7.8	70.51	21.69	17.04	75.83	0.16	1.15	0.91	4.91
6103000200	13.82	22.53	20-25%	Tehama	7692	12.73	67.51	19.76	16.81	76.39	0.62	3.22	1.78	1.17
6103000300	26.41	51.65	50-55%	Tehama	4433	9.5	67.72	22.78	22.08	71.71	0.68	0.63	0.97	3.93
6103000400	17.21	30.81	30-35%	Tehama	6220	4.65	68.41	26.95	11.17	77.7	1.19	1.46	3.47	5
6103000500	32.53	63.38	60-65%	Tehama	5130	9.92	73.98	16.1	10.19	78.46	2.16	0.68	4.05	4.44
6103000600	27.35	53.64	50-55%	Tehama	5645	14.58	65.78	19.65	23.49	70.89	1.91	0.5	0.8	2.41
6103000700	33.77	65.46	65-70%	Tehama	7724	17.79	66.08	16.13	18.41	75.49	0.25	0.85	1.95	3.04
6103000800	30.15	59.03	55-60%	Tehama	4315	9.52	72.89	17.59	38.05	53.58	0	4.52	0	3.85
6103000900	21.05	40.05	40-45%	Tehama	3375	14.99	61.16	23.85	26.58	70.28	0	0.71	0.95	1.48

6103001000	23.75	46.05	45-50%	Tehama	6608	14.27	65.18	20.55	39.65	58.52	0	0.08	0.89	0.86
6103001100	36.91	70.45	70-75%	Tehama	7822	15.18	73	11.83	47.53	46.41	0.95	1.44	0.58	3.08
6105000101	8.76	10.11	10-15%	Trinity	2522	7.61	64.27	28.11	3.01	78.31	2.54	7.89	3.37	4.88
6105000102	22.18	42.50	40-45%	Trinity	4091	11.78	66.24	21.98	4.69	89.49	0.66	4.72	0.07	0.37
6105000200	11.66	16.93	15-20%	Trinity	2011	6.32	63.4	30.28	5.62	81.85	0	9.6	1.84	1.09
6105000300	12.73	19.70	15-20%	Trinity	3182	10.4	58.96	30.64	15.84	74.48	1.1	2.8	3.55	2.23
6105000400	15.40	26.46	25-30%	Trinity	894	11.97	63.65	24.38	4.7	86.69	0.11	2.68	0	5.82
6107000100	21.67	41.44	40-45%	Tulare	4845	8.36	66.27	25.37	21.84	71.46	1.57	0.56	3.24	1.34
6107000201	48.97	86.67	85-90%	Tulare	9384	18.01	73.14	8.86	86.07	2.88	0	2.64	7.03	1.37
6107000202	48.73	86.43	85-90%	Tulare	2369	20.09	68.13	11.78	84.25	11.57	0	0.17	4.01	0
6107000301	48.05	85.58	85-90%	Tulare	7486	17.13	71.96	10.91	60.46	36.28	0.52	0.43	0.43	1.88
6107000302	62.66	96.91	95-100% (highest scores)	Tulare	3205	19.22	72.64	8.14	84.18	14.04	0.34	0	0.56	0.87
6107000401	43.90	80.67	80-85%	Tulare	6242	17.88	73.87	8.25	81.32	11.69	0	0.38	5.91	0.69
6107000402	40.15	75.21	75-80%	Tulare	7415	16.6	73.1	10.3	80.38	18.56	0.42	0.15	0.5	0
6107000501	59.97	95.68	95-100% (highest scores)	Tulare	7097	22.53	69.13	8.34	93.36	3.86	0.41	0.1	0.75	1.52
6107000502	49.68	87.51	85-90%	Tulare	4107	17.58	74.46	7.96	88.04	9.33	0.46	0	0.87	1.29
6107000600	47.26	84.75	80-85%	Tulare	6998	19.15	71.49	9.36	89.73	6.34	0.67	0	1.69	1.57
6107000701	37.05	70.68	70-75%	Tulare	2425	17.94	63.88	18.19	69.44	29.61	0.04	0.21	0.7	0
6107000702	38.63	73.06	70-75%	Tulare	6028	20.54	69.67	9.79	91.26	4.03	0	0	3.59	1.13
6107000800	40.95	76.58	75-80%	Tulare	7837	19.65	68.76	11.59	70.79	26.34	0	0.19	0	2.68
6107000900	59.01	95.10	95-100% (highest scores)	Tulare	9746	16.9	77.2	5.9	70	21.47	0.94	2.24	3.61	1.75
6107001003	39.52	74.19	70-75%	Tulare	25636	18.47	75.04	6.49	50.91	38.73	0.05	0	8.15	2.15
6107001004	50.06	87.95	85-90%	Tulare	7791	18.65	72.81	8.54	77.47	6.85	0.6	0.28	13.19	1.59
6107001005	34.36	66.48	65-70%	Tulare	2785	13.43	70.88	15.69	25.49	67.72	0	0	4.2	2.59
6107001006	33.27	64.54	60-65%	Tulare	5144	9.08	70.47	20.45	28.97	64.95	0.14	0	2.57	3.38
6107001100	53.94	91.59	90-95%	Tulare	6950	20.03	72.33	7.64	77.88	11.6	1.99	0.73	7.54	0.26
6107001200	49.98	87.86	85-90%	Tulare	1245	13.73	65.06	21.2	34.62	47.31	2.33	0.24	4.42	11.08
6107001301	30.79	60.24	60-65%	Tulare	8734	20.98	71.89	7.13	54.37	37.47	0.39	0.13	4.35	3.29
6107001302	44.35	81.29	80-85%	Tulare	9219	23.08	67.19	9.73	63.26	27.8	2.23	0.37	5.47	0.87
6107001400	28.72	56.32	55-60%	Tulare	4826	11.09	71.43	17.49	57	41.38	0.33	0	0.52	0.77
6107001501	35.81	68.87	65-70%	Tulare	5421	14.98	72.07	12.95	33.59	58.09	0.63	0.55	5.46	1.68
6107001502	41.39	77.26	75-80%	Tulare	5745	19.04	65.12	15.84	56.38	39.39	0.94	0.92	1.41	0.96
6107001601	40.30	75.49	75-80%	Tulare	5422	14	78.68	7.32	85.63	11.93	0.57	0	0.45	1.42
6107001602	44.73	81.67	80-85%	Tulare	6023	19.34	71.28	9.38	78.68	19.96	0.58	0	0.6	0.18
6107001701	43.79	80.53	80-85%	Tulare	6626	14.59	75.43	9.98	62.47	31.87	1.22	0.15	2.57	1.72
6107001703	32.24	62.81	60-65%	Tulare	6458	17.92	67.56	14.52	40.52	50.82	0.93	0	1.83	5.9
6107001704	22.41	43.07	40-45%	Tulare	7474	13.97	74.93	11.11	42.11	47.54	0.83	0.96	5.93	2.64
6107001800	33.08	64.18	60-65%	Tulare	4608	16.43	67.95	15.63	41.15	40.82	9.57	0.13	3.86	4.47
6107001901	27.64	54.20	50-55%	Tulare	3761	12.2	72.83	14.97	54.93	42.86	0	0	1.97	0.24
6107001902	34.49	66.68	65-70%	Tulare	4337	16.51	67.65	15.84	38.18	57.39	0.32	0	2.97	1.13
6107002002	36.71	70.11	70-75%	Tulare	4370	13.34	72.75	13.91	50.98	43.64	0	0	4.92	0.46
6107002003	36.08	69.26	65-70%	Tulare	6426	25.37	62.59	12.04	50.14	36.88	12.43	0	0.37	0.17
6107002004	28.41	55.74	55-60%	Tulare	4972	10.4	73.51	16.09	48.87	45.47	0.68	1.75	2.55	0.66
6107002006	26.88	52.77	50-55%	Tulare	4364	12.03	70.35	17.62	30.91	63.41	0.25	0	4.58	0.85
6107002007	30.47	59.59	55-60%	Tulare	8642	17.72	68.25	14.04	44.76	44.04	3.41	2.18	3.39	2.22
6107002008	33.93	65.68	65-70%	Tulare	2562	10.93	69.67	19.4	41.53	41.1	4.96	0.82	5.07	6.52
6107002009	28.35	55.60	55-60%	Tulare	3795	14.2	65.3	20.5	45.27	49.75	0.9	1.13	2.32	0.63
6107002100	45.06	82.06	80-85%	Tulare	2536	15.02	74.33	10.65	61.51	34.11	0.59	0.08	2.37	1.34
6107002202	54.31	91.93	90-95%	Tulare	5765	23.24	70.39	6.37	76.6	10.46	10.62	0.26	1.77	0.29
6107002203	29.33	57.49	55-60%	Tulare	4663	20.18	77.35	2.47	72.55	22	0.86	0	4.25	0.34
6107002204	37.36	71.17	70-75%	Tulare	6280	23.41	68.61	7.98	75.33	16.16	4.49	0.51	0.55	2.95
6107002302	34.72	67.13	65-70%	Tulare	4611	15.16	74.08	10.76	48.02	41.49	5.92	0.3	1.47	2.8
6107002303	39.17	73.74	70-75%	Tulare	6636	11.87	67.83	20.3	35.46	54.05	2.95	1.22	1.4	4.91
6107002304	45.91	83.09	80-85%	Tulare	1885	10.93	71.3	17.77	46.58	42.86	2.07	1.64	3.08	3.77
6107002400	42.73	79.03	75-80%	Tulare	14401	20.44	71.27	8.29	55.48	38.83	1.57	0.48	2.88	0.76
6107002500	42.29	78.44	75-80%	Tulare	4035	16.03	66.22	17.74	65.8	32.22	0	0	1.98	0
6107002601	42.03	78.13	75-80%	Tulare	4635	17.99	72.13	9.88	92.34	5.63	1.42	0.19	0.22	0.19
6107002602	42.59	78.81	75-80%	Tulare	5749	14.04	76.01	9.95	86.36	11.98	0	0	1.65	0

6107002700	23.84	46.34	45-50%	Tulare	5237	9.26	66.89	23.85	17.72	64.14	1.51	11.8	1.6	3.23
6107002800	45.76	82.93	80-85%	Tulare	3599	17.2	72.41	10.39	78.05	19.37	0	0	0.69	1.89
6107002901	59.19	95.21	95-100% (highest scores)	Tulare	4202	21.32	71.92	6.76	87.08	9.5	3.43	0	0	0
6107002903	36.50	69.86	65-70%	Tulare	4717	14.8	71.21	13.99	53.68	41.57	0.13	2.76	0	1.87
6107002904	35.87	68.96	65-70%	Tulare	5175	19.36	72.89	7.75	63.15	33.47	0.6	0.81	0.39	1.58
6107003001	51.05	88.89	85-90%	Tulare	4702	20.69	73.25	6.06	83.43	12.99	0.98	0	0.57	2.02
6107003002	44.96	81.93	80-85%	Tulare	3525	19.15	74.72	6.13	78.01	14.21	4.79	0	2.24	0.74
6107003100	60.67	96.12	95-100% (highest scores)	Tulare	3515	21.99	70.73	7.28	75.42	21.85	1.54	0.51	0	0.68
6107003200	54.62	92.25	90-95%	Tulare	7396	19.42	74.49	6.1	87.41	12.22	0	0.27	0.09	0
6107003300	51.48	89.45	85-90%	Tulare	8019	16.11	70.59	13.29	68.72	30.33	0.09	0	0.3	0.56
6107003400	60.26	95.83	95-100% (highest scores)	Tulare	6781	11.68	71.07	17.25	53.59	35.32	0.27	0.16	8.55	2.11
6107003501	28.98	56.91	55-60%	Tulare	2879	12.85	70.13	17.02	33.28	51.48	0	0.56	10.14	4.55
6107003502	39.72	74.58	70-75%	Tulare	12394	15.07	73.62	11.3	59.51	28.08	0.63	1.19	3.49	7.11
6107003601	31.51	61.51	60-65%	Tulare	7569	10.68	77.71	11.61	63.31	22.87	1.39	0.38	9.47	2.58
6107003602	43.38	79.99	75-80%	Tulare	7130	19.71	68.98	11.32	62.24	29.8	0.07	0.28	7.24	0.36
6107003700	49.18	86.99	85-90%	Tulare	6449	18.62	70.63	10.75	61.37	30.62	0	0	5.85	2.16
6107003801	47.01	84.49	80-85%	Tulare	3021	15.49	71.86	12.64	61.3	30.45	0.26	0.43	3.97	3.57
6107003802	46.49	83.85	80-85%	Tulare	4604	15.31	73.94	10.75	74.93	16.9	0.35	0.96	4.43	2.43
6107003901	50.62	88.49	85-90%	Tulare	6648	20.68	69.51	9.81	81.96	18.02	0.02	0	0	0
6107003902	47.40	84.90	80-85%	Tulare	5549	17.53	68.73	13.73	64.73	30.71	0	0	3.3	1.26
6107004000	NA	NA	NA	Tulare	582	0	48.28	51.72	23.2	62.03	9.11	1.03	2.57	2.06
6107004101	59.12	95.16	95-100% (highest scores)	Tulare	9417	16.87	74.73	8.4	80.59	13.92	0.01	0.01	4.07	1.4
6107004102	51.89	89.89	85-90%	Tulare	1999	13.71	74.39	11.91	67.43	25.71	0	4.15	1.45	1.25
6107004200	61.52	96.41	95-100% (highest scores)	Tulare	5934	19.16	70.46	10.38	86.97	8.26	4.11	0	0.46	0.2
6107004300	54.73	92.30	90-95%	Tulare	7437	16.82	75.25	7.93	91.49	5.55	0.26	1.06	1.47	0.17
6107004400	42.65	78.92	75-80%	Tulare	7541	16.6	74.75	8.65	93.82	0	0	0	6.18	0
6107004500	46.78	84.14	80-85%	Tulare	6161	11.91	74.66	13.42	80.18	18.81	0.08	0.52	0.06	0.34
6109001100	19.01	35.20	35-40%	Tuolumne	3770	10.13	61.56	28.3	14.19	79.89	2.12	0.53	1.33	1.94
6109001200	28.92	56.82	55-60%	Tuolumne	3516	13.59	62.77	23.63	14.53	70.68	0.03	0.77	9.93	4.07
6109002100	19.16	35.53	35-40%	Tuolumne	4391	8.29	63.99	27.72	7.61	84.24	0	2.85	0.18	5.12
6109002200	12.21	18.47	15-20%	Tuolumne	8493	9.43	65.07	25.5	9.21	85.18	0.46	0.37	0.41	4.38
6109003100	11.78	17.27	15-20%	Tuolumne	5783	7.54	69.65	22.81	8.39	88.19	0	0.42	1.66	1.35
6109003200	9.22	11.08	10-15%	Tuolumne	5933	14.75	64.79	20.46	14.41	81.48	0.03	1.89	0.91	1.28
6109004100	24.46	47.73	45-50%	Tuolumne	5491	9.54	58.9	31.56	13.33	79.86	0.07	2.6	0.76	3.37
6109004200	12.83	20.03	20-25%	Tuolumne	3487	6.31	49.9	43.79	4.79	89.19	0	2.27	1.49	2.27
6109005100	27.44	53.86	50-55%	Tuolumne	8502	9.09	63.81	27.1	12.56	84.73	0.02	1.58	0.11	1
6109005201	22.64	43.57	40-45%	Tuolumne	2170	9.49	70.18	20.32	15.94	72.4	6.5	0.18	1.15	3.82
6109985202	NA	NA	NA	Tuolumne	2509	0	99.68	0.32	31.96	28.18	27.06	2.55	5.38	4.86
6111000100	14.69	24.75	20-25%	Ventura	620	4.68	68.23	27.1	4.84	88.39	0	0	1.77	5
6111000200	30.60	59.85	55-60%	Ventura	2387	15.29	70	14.7	86.8	9.34	0.96	1.01	0.17	1.72
6111000302	31.46	61.38	60-65%	Ventura	8257	12.67	75.28	12.05	72.13	23.51	0	1.02	1.22	2.12
6111000303	17.60	31.82	30-35%	Ventura	5076	9.65	76.18	14.16	72.75	25.08	0.85	0	0.59	0.73
6111000304	25.60	50.13	50-55%	Ventura	4279	11.08	75.04	13.88	74.78	23.74	0	0	0.86	0.61
6111000400	25.46	49.79	45-50%	Ventura	6021	11.61	74.57	13.82	76.73	20.99	0.28	0.08	1.16	0.75
6111000500	39.97	74.94	70-75%	Ventura	1697	13.26	63.94	22.8	59.16	39.25	0	0	1.41	0.18
6111000600	37.58	71.44	70-75%	Ventura	5969	20.14	70.01	9.85	91.37	6.57	0.89	0	0.55	0.62
6111000701	33.38	64.76	60-65%	Ventura	7508	16.06	76.52	7.42	88.04	6.94	0.01	0.28	2.24	2.49
6111000702	19.57	36.41	35-40%	Ventura	3240	15.46	72.04	12.5	82.65	14.23	0.15	0	0.59	2.38
6111000800	28.34	55.53	55-60%	Ventura	8465	15.13	71.12	13.75	68.04	28.58	0.17	0.18	1.36	1.68
6111000901	11.48	16.55	15-20%	Ventura	2503	5.99	53.22	40.79	12.62	85.3	0.28	0	1.16	0.64
6111000902	12.71	19.69	15-20%	Ventura	2026	8	66.39	25.62	15.1	82.08	0.35	0.15	1.68	0.64
6111000903	10.42	13.87	10-15%	Ventura	5854	9	67.03	23.97	18.74	74.12	0.15	0	4.8	2.19
6111001001	9.47	11.60	10-15%	Ventura	2560	10.47	67.58	21.95	18.98	70.12	0.16	0.35	3.2	7.19
6111001002	16.49	29.07	25-30%	Ventura	6357	6.15	70.65	23.2	26.95	66.7	0.28	0	1.21	4.86
6111001101	13.65	22.08	20-25%	Ventura	4957	10.51	73.59	15.9	31.17	63.12	0	1.84	1.03	2.84
6111001102	13.50	21.71	20-25%	Ventura	3660	6.58	70.22	23.2	19.29	77.92	0.05	0	0.85	1.89
6111001201	19.24	35.69	35-40%	Ventura	5147	14.55	68.64	16.81	44.32	43.15	8.2	0	2.43	1.9
6111001202	6.13	4.98	1-5% (lowest scores)	Ventura	7385	14.01	65.44	20.54	24.62	64.54	1.73	0.01	6.95	2.15

6111001204	17.33	31.14	**30-35%**	Ventura	3036	12.35	76.28	11.36	54.84	40.48	1.02	0.46	0.4	2.8
6111001206	NA	NA	**NA**	Ventura	778	12.47	63.37	24.16	38.05	53.86	0	0	3.86	4.24
6111001301	20.33	38.33	**35-40%**	Ventura	7944	9.66	79.07	11.28	43.43	48.77	1.28	0	5.07	1.45
6111001302	32.11	62.62	**60-65%**	Ventura	2358	9.8	60.6	29.6	59.92	31.51	0.76	0	6.87	0.93
6111001401	10.03	13.02	**10-15%**	Ventura	4103	9.41	72.8	17.79	29.49	59.25	0	0	7.34	3.92
6111001402	12.32	18.76	**15-20%**	Ventura	5418	13.33	67.61	19.07	30.77	64.65	0.24	0	2.29	2.05
6111001502	24.12	46.99	**45-50%**	Ventura	9534	10.44	74.73	14.83	48.46	43.51	0.93	0.33	4.04	2.74
6111001503	25.82	50.64	**50-55%**	Ventura	5106	8.6	77.69	13.71	36.04	49.76	6.58	0.14	4.56	2.92
6111001506	15.93	27.65	**25-30%**	Ventura	5151	12.13	69.56	18.31	33.61	50.73	5.16	0.89	3.71	5.9
6111001507	24.86	48.46	**45-50%**	Ventura	4063	13.32	73.37	13.32	40.63	47.28	2.29	0	5.39	4.41
6111001601	15.77	27.29	**25-30%**	Ventura	1260	18.1	71.03	10.87	38.02	55	2.62	0	3.73	0.63
6111001602	13.47	21.62	**20-25%**	Ventura	2503	12.94	63.56	23.49	22.57	73.07	0.2	0	1	3.16
6111001700	4.30	2.04	**1-5% (lowest scores)**	Ventura	3373	12.66	61.1	26.24	21.43	72.34	0.09	0	3.38	2.76
6111001800	6.40	5.51	**5-10%**	Ventura	4624	10.47	66.65	22.88	14.55	77.66	0.67	0.89	2.85	3.37
6111001900	12.47	19.16	**15-20%**	Ventura	4193	16.79	63.92	19.29	24.56	69.28	1.26	0	2.48	2.41
6111002000	9.56	11.84	**10-15%**	Ventura	2622	8.35	67.28	24.37	10.91	78.99	1.37	0	4.77	3.97
6111002102	22.68	43.67	**40-45%**	Ventura	1645	6.69	76.29	17.02	11.98	78.97	0	1.34	3.16	4.56
6111002200	30.68	60.05	**60-65%**	Ventura	6350	17.21	72.44	10.35	68.08	29.73	0.52	0.55	0.9	0.22
6111002300	45.73	82.90	**80-85%**	Ventura	6534	12.17	82.25	5.59	75.11	22.67	0.41	0.26	0.44	1.1
6111002400	44.32	81.28	**80-85%**	Ventura	2587	4.33	84.15	11.52	31.5	59.91	2.32	1.93	2.28	2.05
6111002500	21.48	41.07	**40-45%**	Ventura	5374	8.71	68.44	22.85	17.77	74.69	0.82	1.8	2.64	2.27
6111002600	16.32	28.62	**25-30%**	Ventura	3010	8.47	77.77	13.75	23.22	70.93	0.66	1.26	1.99	1.93
6111002700	15.48	26.61	**25-30%**	Ventura	4398	10.6	67.83	21.58	29.99	61.71	0	0.39	3.91	4
6111002800	21.77	41.72	**40-45%**	Ventura	6693	13.92	73.76	12.31	30.38	63.08	0.84	0.19	3.44	2.08
6111002901	24.36	47.54	**45-50%**	Ventura	5665	7.24	76.2	16.56	51.51	27.15	3.46	0	12.15	5.74
6111002905	34.55	66.81	**65-70%**	Ventura	5433	10.1	73.04	16.86	56.95	20.43	8.28	0	10.8	3.53
6111003010	19.44	36.03	**35-40%**	Ventura	3226	14.57	75.7	9.73	75.05	13.79	2.54	0.03	8.02	0.56
6111003011	27.75	54.41	**50-55%**	Ventura	5539	16.7	73.28	10.02	81.87	11.05	1.17	0	4.85	1.05
6111003012	NA	NA	**NA**	Ventura	675	46.22	51.85	1.93	98.07	1.93	0	0	0	0
6111003013	19.90	37.33	**35-40%**	Ventura	5509	11.54	81.56	6.9	64.89	21.56	4.17	0	5.81	3.56
6111003100	30.11	58.89	**55-60%**	Ventura	14299	14.76	76.43	8.8	64.62	14.64	2.23	0.66	16.57	1.28
6111003201	38.81	73.23	**70-75%**	Ventura	4230	15.32	79.74	4.94	97.57	0.76	0.17	0.52	0.35	0.64
6111003300	27.64	54.19	**50-55%**	Ventura	8956	16.51	74.32	9.17	78.32	17.01	0.98	0.21	1.35	2.13
6111003605	23.01	44.53	**40-45%**	Ventura	9631	10.9	74.31	14.79	51.69	28.71	4.62	0	9.57	5.41
6111003608	29.69	58.13	**55-60%**	Ventura	4024	18.24	73.09	8.67	66.05	19.16	1.69	0.25	7.41	5.44
6111003609	21.16	40.31	**40-45%**	Ventura	5863	2.73	67.53	29.75	8.8	87.19	0	0	1.98	2.03
6111003612	22.68	43.66	**40-45%**	Ventura	4962	9.37	76.1	14.53	18.58	74.59	1.51	1.67	1.29	2.36
6111003700	25.80	50.59	**50-55%**	Ventura	6687	16.64	75	8.36	89.17	3.41	6.13	0	1.29	0
6111003801	30.76	60.17	**60-65%**	Ventura	5033	15.52	76.87	7.61	93.09	2.13	0.7	0	4.09	0
6111003802	28.37	55.69	**55-60%**	Ventura	2849	17.16	75.15	7.69	90.94	3.72	3.76	0	1.58	0
6111003900	41.73	77.69	**75-80%**	Ventura	6984	17.9	76.06	6.04	87.51	3.45	3.09	0	5.54	0.4
6111004000	25.14	49.05	**45-50%**	Ventura	7179	11.17	78.26	10.57	88.63	5.08	1.5	0	4.15	0.63
6111004101	20.19	37.99	**35-40%**	Ventura	6947	15.78	75.5	8.72	85.02	7.82	3.11	0.14	2.68	1.24
6111004200	25.56	50.03	**50-55%**	Ventura	5797	12.8	77.37	9.83	75.25	17.56	1.66	0	3.8	1.74
6111004304	23.03	44.59	**40-45%**	Ventura	5978	16.26	63.18	20.56	56.61	29.34	7.24	0.27	4.28	2.26
6111004305	20.79	39.55	**35-40%**	Ventura	2295	14.55	85.45	0	20.04	51.02	18.08	0.48	5.58	4.79
6111004400	43.39	80.02	**80-85%**	Ventura	8086	13.31	74.88	11.81	64.72	27.67	1.87	0	3.85	1.9
6111004503	37.69	71.61	**70-75%**	Ventura	5112	22.4	70.36	7.24	72.44	10.92	2.86	0	12.03	1.76
6111004504	24.49	47.77	**45-50%**	Ventura	5777	17.52	74.66	7.82	84.25	3.58	2.06	0.21	9.33	0.57
6111004505	23.72	45.99	**45-50%**	Ventura	2208	12.95	78.89	8.15	90.67	6.52	1.45	0	1.09	0.27
6111004506	34.76	67.18	**65-70%**	Ventura	7788	25.48	69.56	4.97	92.23	3.38	1.93	0.24	1.63	0.59
6111004600	28.42	55.76	**55-60%**	Ventura	2035	24.32	75.14	0.54	13.86	63.64	6.58	1.38	6.68	7.86
6111004704	40.60	76.03	**75-80%**	Ventura	1372	13.41	74.64	11.95	71.5	16.91	3.5	0	2.92	5.17
6111004710	32.25	62.85	**60-65%**	Ventura	5707	14.96	76.27	8.76	73.93	9.44	3.28	0	11.06	2.3
6111004711	26.37	51.58	**50-55%**	Ventura	3552	14.08	70.78	15.15	58.47	4.84	0.56	0	35.02	1.1
6111004715	48.18	85.70	**85-90%**	Ventura	5417	12.07	78.2	9.73	77.28	9.06	2.66	0.15	9.03	1.83
6111004716	38.42	72.82	**70-75%**	Ventura	5066	15	75.96	9.04	84.41	5.03	0.67	0	9.56	0.34
6111004717	35.44	68.34	**65-70%**	Ventura	3951	15.41	76.56	8.02	87.95	3.59	2.66	0	4.13	1.67

6111004901	26.56	52.12	50-55%	Ventura	7229	12.21	83.15	4.63	57.96	15.6	5.33	0	17.05	4.05
6111004902	54.10	91.75	90-95%	Ventura	5072	14.98	72.71	12.3	97.91	1.85	0	0	0.24	0
6111005002	39.47	74.12	70-75%	Ventura	3339	21.35	73.2	5.45	93.74	5.6	0.63	0	0	0.03
6111005003	42.50	78.68	75-80%	Ventura	7261	14.41	75.43	10.16	81.86	13.43	1.97	0	1.51	1.23
6111005004	27.41	53.77	50-55%	Ventura	9833	12.93	80.27	6.8	52.22	27.62	2.9	0.37	11.84	5.04
6111005100	25.99	50.96	50-55%	Ventura	4099	5.76	75.02	19.22	49.3	42.06	5.81	0.27	0.98	1.59
6111005202	16.57	29.27	25-30%	Ventura	2570	6.61	68.02	25.37	27.47	64.82	2.3	0.82	4.28	0.31
6111005203	10.20	13.45	10-15%	Ventura	5762	10.41	66.68	22.91	24.09	61.7	1.01	0	4.89	8.31
6111005204	11.10	15.65	15-20%	Ventura	3449	7.97	65.44	26.59	16.87	70.31	0.52	0	8.44	3.86
6111005205	17.53	31.64	30-35%	Ventura	6072	8.65	59.85	31.51	15.42	64.66	1.93	0	16.27	1.73
6111005303	10.51	14.11	10-15%	Ventura	9578	8.26	77.47	14.27	25.61	57.55	0	0.57	12	4.27
6111005304	14.50	24.34	20-25%	Ventura	5623	6.17	43.93	49.9	18.5	72.22	0.92	0	7.08	1.28
6111005305	9.07	10.72	10-15%	Ventura	5437	6.33	69.8	23.87	11.7	66.54	2.37	1.54	12.62	5.22
6111005306	6.73	6.20	5-10%	Ventura	4843	13.11	69.67	17.22	16.68	71.2	0.62	0	8.82	2.68
6111005401	10.21	13.48	10-15%	Ventura	4312	10.74	70.94	18.32	34.93	55.1	0.23	0.02	8.86	0.86
6111005403	27.88	54.73	50-55%	Ventura	2582	11.77	70.22	18.01	58.17	33.58	1.2	0	4.69	2.36
6111005404	23.34	45.26	45-50%	Ventura	3924	11.16	70.18	18.65	36.01	55.1	0.41	0	5.86	2.62
6111005502	30.78	60.22	60-65%	Ventura	5227	13.81	78.69	7.5	38.55	39.76	1.95	0.96	13.77	5.01
6111005503	19.42	35.98	35-40%	Ventura	4364	19.48	63.04	17.48	23.65	45.92	10.54	0.62	10.2	9.07
6111005504	10.75	14.81	10-15%	Ventura	4255	13.14	67.24	19.62	27.17	59.88	0.75	0.31	8.13	3.76
6111005600	23.61	45.68	45-50%	Ventura	10497	10.24	71.65	18.11	30.63	55.57	1.15	0	10.65	2
6111005700	14.29	23.80	20-25%	Ventura	3702	7	90.25	2.76	36.47	46.62	3.38	0.89	7.16	5.48
6111005801	9.15	10.96	10-15%	Ventura	5257	10.1	76.89	13.01	8.71	76.58	0.34	0	13.16	1.2
6111005802	7.68	8.01	5-10%	Ventura	9547	10.38	73.11	16.51	8.95	72.39	0.67	0	15.44	2.56
6111005901	6.79	6.37	5-10%	Ventura	6623	11.72	70.56	17.73	12.55	76.46	0	0	8.53	2.46
6111005906	14.01	23.10	20-25%	Ventura	6463	10.2	71.65	18.15	13.82	72.35	1.86	0.6	8.79	2.58
6111005907	9.28	11.14	10-15%	Ventura	3467	7.12	55.87	37.01	11.16	82.95	2.86	0	1.85	1.18
6111005908	17.97	32.65	30-35%	Ventura	2892	14.59	68.78	16.63	10.24	69.81	3.49	0	12.59	3.87
6111005909	12.62	19.45	15-20%	Ventura	3335	7.05	66.66	26.3	13.43	74.63	1.44	0	8.79	1.71
6111005910	5.31	3.58	1-5% (lowest scores)	Ventura	1796	5.01	72.61	22.38	8.96	81.24	2.62	0	4.4	2.78
6111005911	10.77	14.86	10-15%	Ventura	3643	7.58	71.97	20.45	16.22	68.71	3.29	0	6.09	5.68
6111006000	16.99	30.47	30-35%	Ventura	4947	15.5	71.5	13	21.93	67.84	0	0	5.42	4.81
6111006100	31.23	61.14	60-65%	Ventura	8324	18.69	71	10.31	39.26	38.21	1.97	0	20.21	0.35
6111006200	6.09	4.88	1-5% (lowest scores)	Ventura	3032	5.74	68.54	25.73	9.3	74.51	0	0.82	14.97	0.4
6111006301	7.48	7.60	5-10%	Ventura	6502	9.35	62.09	28.56	18.13	74.79	0.46	0	5.2	1.41
6111006302	21.14	40.29	40-45%	Ventura	3618	5.33	80.9	13.76	16.69	68.3	1.22	0.11	9.7	3.98
6111006400	11.54	16.70	15-20%	Ventura	6859	10.79	68.23	20.98	24.16	63.52	1.39	0	6.7	4.23
6111006500	22.60	43.46	40-45%	Ventura	3563	11	76.51	12.49	27.28	62	0	2.25	5.67	2.81
6111006600	13.82	22.50	20-25%	Ventura	4129	8.84	69.34	21.82	19.86	72.1	0.92	0	5.23	1.89
6111006700	9.90	12.67	10-15%	Ventura	3431	8.98	67.91	23.11	16.85	71.52	0.85	0.35	8.02	2.42
6111006800	16.31	28.59	25-30%	Ventura	3705	13.28	71.9	14.82	24.8	67.02	1.13	0.49	2.62	3.94
6111006900	19.08	35.33	35-40%	Ventura	4048	8.45	72.83	18.73	28.21	59.58	1.09	0	7.11	4
6111007000	29.38	57.56	55-60%	Ventura	4277	15.29	69.18	15.52	44.63	35.59	2.78	0	13.77	3.23
6111007100	26.11	51.12	50-55%	Ventura	6846	10.77	78.35	10.88	48.01	43.16	0.56	1.24	4.79	2.23
6111007201	6.60	5.94	5-10%	Ventura	3606	12.4	68.58	19.02	12.29	75.07	4.66	0.28	5.02	2.69
6111007202	9.10	10.84	10-15%	Ventura	4446	7.94	65.45	26.61	12.3	72.02	1.15	0.25	8.1	6.19
6111007300	7.79	8.16	5-10%	Ventura	1997	5.01	71.46	23.54	9.11	78.17	0.2	0.4	7.91	4.21
6111007402	11.49	16.59	15-20%	Ventura	5981	7.77	57.53	34.69	8.26	84.12	1.2	0	6.25	0.17
6111007403	7.63	7.94	5-10%	Ventura	5965	14.4	69.46	16.14	10.18	56.38	1.12	0	25.63	6.69
6111007405	6.33	5.38	5-10%	Ventura	6026	10.42	73.85	15.73	10.17	70.44	1.74	0	12.93	4.71
6111007406	6.64	6.01	5-10%	Ventura	2390	13.64	73.89	12.47	5.02	70.25	0.79	0	20.33	3.6
6111007505	14.24	23.64	20-25%	Ventura	3170	8.68	71.8	19.53	24.98	60.88	2.33	0	8.04	3.75
6111007506	8.19	8.94	5-10%	Ventura	7186	7.95	77.09	14.96	18.33	72.1	0.26	0	7.77	1.54
6111007507	5.60	3.96	1-5% (lowest scores)	Ventura	6469	6.76	76.53	16.71	9.07	72.47	0.57	0	14.98	2.91
6111007508	6.19	5.08	5-10%	Ventura	3609	10.78	67.58	21.64	17.93	72.4	3.1	0	5.23	1.33
6111007509	9.10	10.83	10-15%	Ventura	4500	11.02	76.93	12.04	7.51	71.69	0.51	0	14.33	5.96
6111007510	8.39	9.38	5-10%	Ventura	6421	10.08	73.51	16.41	11.9	66.31	0	0	18.07	3.72
6111007511	18.42	33.72	30-35%	Ventura	2217	8.12	74.33	17.55	14.21	70.23	2.66	0	9.25	3.65

6111007512	16.75	29.82	25-30%	Ventura	5579	9.8	78.38	11.81	18.14	63.06	0.99	0	13.57	4.25
6111007513	13.16	20.83	20-25%	Ventura	1767	8.32	74.48	17.2	11.71	78.66	0.74	0	4.92	3.96
6111007514	21.01	40.00	40-45%	Ventura	6317	7.74	68.72	23.54	15.8	69.51	1.98	0	10.27	2.44
6111007606	13.40	21.50	20-25%	Ventura	1859	8.88	73.1	18.02	12.59	65.57	3.98	0.32	14.74	2.8
6111007607	7.37	7.44	5-10%	Ventura	6243	13.52	74.15	12.33	13.39	71.41	2.64	0	8.78	3.78
6111007609	9.74	12.32	10-15%	Ventura	2530	12.53	72.61	14.86	16.32	71.94	2.33	1.19	6.33	1.9
6111007610	10.25	13.60	10-15%	Ventura	5339	6.78	80.93	12.29	19.89	66.14	3.37	0	6.48	4.12
6111007611	37.11	70.74	70-75%	Ventura	3923	15.09	75.76	9.15	82.92	11.19	0.18	0	4.89	0.82
6111007612	29.35	57.53	55-60%	Ventura	5071	13.09	71.62	15.28	39.87	46.85	0.43	0.81	7.91	4.12
6111007613	13.57	21.91	20-25%	Ventura	4894	13.96	74.15	11.89	22.93	63.63	0.65	0.25	8.91	3.64
6111007614	16.10	28.13	25-30%	Ventura	8375	12.5	73.76	13.74	33.05	47.63	0.19	0	12.64	6.48
6111007700	29.75	58.18	55-60%	Ventura	5813	14.09	72.73	13.18	33.58	56.84	1	0	6.61	1.98
6111007800	22.81	43.97	40-45%	Ventura	4072	13.21	77.85	8.94	42.46	34.75	3.66	0	17.98	1.15
6111007901	23.17	44.88	40-45%	Ventura	5361	14.08	78.21	7.7	41.73	43.56	4.36	0	7.42	2.93
6111007903	14.13	23.36	20-25%	Ventura	5042	11.23	73.88	14.89	19.73	54.01	2.82	0	17.51	5.93
6111007904	20.16	37.91	35-40%	Ventura	5668	14.33	72.37	13.3	34.4	54.15	0.23	0	7.44	3.78
6111008001	23.15	44.86	40-45%	Ventura	3871	12.43	76.21	11.37	41.46	48.75	1.11	0	5.06	3.62
6111008002	18.69	34.51	30-35%	Ventura	5020	10.12	78.39	11.49	43.01	52.29	0.06	0	3.65	1
6111008004	17.87	32.41	30-35%	Ventura	5292	10	80.4	9.6	40.82	46.71	0.34	0.23	8.94	2.97
6111008005	15.30	26.21	25-30%	Ventura	2706	11.79	77.35	10.86	43.68	45.93	2.85	0.59	4.43	2.51
6111008101	23.49	45.57	45-50%	Ventura	3233	7.55	73.74	18.71	22.21	68.14	0.03	0	8.54	1.08
6111008201	25.55	49.99	45-50%	Ventura	4843	13.55	72.1	14.35	17.96	61.95	0.76	0	16.48	2.85
6111008202	22.87	44.14	40-45%	Ventura	4576	11.06	75.76	13.18	32.04	50.24	5.73	0	10.16	1.84
6111008302	25.80	50.62	50-55%	Ventura	5736	13.02	68.99	17.99	28.91	60.34	0.4	0	6.49	3.87
6111008303	17.32	31.09	30-35%	Ventura	3895	9.83	63.49	26.68	28.91	59.64	1.13	1.34	7.27	1.72
6111008304	17.43	31.33	30-35%	Ventura	5853	9.43	75.96	14.61	20.6	64.27	1.64	0	10.68	2.8
6111008305	13.74	22.30	20-25%	Ventura	3786	8.66	73.77	17.56	15.35	58.8	0	0.4	22.29	3.17
6111008306	18.62	34.28	30-35%	Ventura	3970	11.49	74.46	14.06	34.18	44.26	1.59	1.31	12.21	6.45
6111008401	23.21	44.94	40-45%	Ventura	5271	8.99	75.45	15.56	26.43	62.02	0.23	0	8.99	2.33
6111008402	14.32	23.84	20-25%	Ventura	5574	10.01	77.79	12.2	19.99	68.3	0	0	10.39	1.33
6111008500	19.83	37.05	35-40%	Ventura	8106	12.41	71.03	16.56	14.5	72.4	0	1.2	9.46	2.44
6111008600	38.16	72.42	70-75%	Ventura	7920	15.73	74.84	9.43	80.85	7.55	1.26	0.14	7.5	2.7
6111008700	35.44	68.32	65-70%	Ventura	6029	15.92	72.85	11.23	76.99	17.8	1.08	0.45	3.35	0.33
6111008800	15.56	26.82	25-30%	Ventura	5582	10.21	78.25	11.54	72.54	16.36	0.66	0.16	7.24	3.05
6111008900	22.42	43.09	40-45%	Ventura	3385	15.51	73.8	10.69	85.55	10.99	0.59	0	2.36	0.5
6111009100	51.33	89.25	85-90%	Ventura	4870	16.67	74.21	9.12	94.8	1.4	1.68	0	1.26	0.86
6111980000	NA	NA	NA	Ventura	118	0	100	0	50.85	16.1	29.66	0	0	3.39
6113010101	49.37	87.27	85-90%	Yolo	6796	16.36	71.17	12.46	38.7	38.42	6.39	1.43	8.75	6.31
6113010102	56.34	93.44	90-95%	Yolo	7729	12.27	76.94	10.79	41.89	44.43	5.41	0	7.15	1.11
6113010201	34.11	66.06	65-70%	Yolo	3549	12	75.51	12.48	31.76	58.04	0.82	0.37	3.69	5.33
6113010203	59.83	95.60	95-100% (highest scores)	Yolo	5355	14.14	75.65	10.21	51.45	25.02	8.07	0.41	8.1	6.95
6113010204	45.33	82.31	80-85%	Yolo	5189	7.88	72.63	19.48	34.23	39.55	2.54	0	8.71	14.97
6113010302	21.65	41.36	40-45%	Yolo	8701	16.18	73.57	10.25	16.87	48.9	1.85	0	22.02	10.36
6113010310	16.96	30.38	30-35%	Yolo	5699	14.99	78.75	6.26	22.53	52.24	6.83	0.4	13.28	4.72
6113010312	18.50	33.94	30-35%	Yolo	5617	14.62	72.81	12.57	19.65	61.9	2.24	0	8.71	7.5
6113010401	14.48	24.27	20-25%	Yolo	4771	15.72	65.84	18.44	21.21	62.78	1.19	0.27	11.82	2.72
6113010402	10.18	13.38	10-15%	Yolo	4548	23.15	66.82	10.03	13.9	48.77	6.9	0	17.83	12.6
6113010501	25.27	49.38	45-50%	Yolo	8606	2.15	97.59	0.26	18.48	28.74	3.2	0	44.06	5.53
6113010505	19.11	35.41	35-40%	Yolo	5047	14.82	74.16	11.02	14.15	54.92	2.81	1.88	19.34	6.9
6113010508	7.52	7.72	5-10%	Yolo	2657	8.2	72.6	19.19	7.64	73.09	0.53	0	15.28	3.46
6113010509	10.05	13.05	10-15%	Yolo	3672	8.31	76.53	15.17	16.01	59.48	0.27	0	19.28	4.96
6113010510	11.41	16.40	15-20%	Yolo	5246	3.72	77.39	18.89	8.73	56.21	2.06	0.67	26.87	5.45
6113010511	9.60	11.93	10-15%	Yolo	3422	7.8	73.29	18.91	13.33	57.13	0.32	0.96	19.14	9.12
6113010512	11.62	16.87	15-20%	Yolo	4106	6.55	84.95	8.5	18.97	48.86	1.73	0	22.53	7.92
6113010513	9.73	12.30	10-15%	Yolo	2918	7.16	85.4	7.44	15.22	60.83	0.51	0.48	17.34	5.62
6113010602	21.62	41.33	40-45%	Yolo	5748	3.13	88.78	8.09	17.68	52.94	7.43	0	15.95	6
6113010605	9.95	12.78	10-15%	Yolo	3270	11.83	77.77	10.4	12.45	47.89	1.35	0.24	30.76	7.31
6113010606	13.28	21.21	20-25%	Yolo	7745	11.14	76.33	12.52	9.74	63.77	2.58	0.97	16.17	6.78

6113010607	14.58	24.50	**20-25%**	Yolo	4156	12.54	70.84	16.63	14.7	58.69	1.15	0	21.05	4.4
6113010608	31.69	61.80	**60-65%**	Yolo	6424	6.96	88.87	4.17	23.01	35.31	1.03	0	38.12	2.54
6113010701	20.90	39.83	**35-40%**	Yolo	5140	3.58	87.39	9.03	13.04	60.86	0.78	0	22.14	3.19
6113010703	18.21	33.28	**30-35%**	Yolo	5915	4.13	87.54	8.33	11.73	49.38	1.69	0	33.29	3.91
6113010704	8.81	10.22	**10-15%**	Yolo	2659	6.54	80.82	12.64	16.21	60.32	2.59	0	14.44	6.43
6113010800	34.04	65.90	**65-70%**	Yolo	3532	11.52	77.27	11.21	56.17	36.44	2.63	1.36	2.89	0.51
6113010901	23.57	45.66	**45-50%**	Yolo	5464	13.8	72.9	13.31	57.65	36.69	3.26	0.2	1.41	0.79
6113010902	24.29	47.35	**45-50%**	Yolo	6110	9.36	77.58	13.06	45.3	44.63	1.96	0	5.99	2.11
6113011001	33.36	64.67	**60-65%**	Yolo	7486	15.67	64.71	19.62	59.93	31.69	1.62	0.65	3.93	2.19
6113011002	14.92	25.38	**25-30%**	Yolo	3739	9.09	66.35	24.55	30.03	62.29	2.33	0.78	3	1.58
6113011101	26.32	51.51	**50-55%**	Yolo	3237	13.19	68.8	18.01	56.13	33.21	0.19	0	2.26	8.22
6113011102	33.15	64.28	**60-65%**	Yolo	5182	17.23	71.9	10.86	66	17.41	2.82	1.02	12.29	0.46
6113011103	16.93	30.31	**30-35%**	Yolo	3069	8.96	82.08	8.96	53.41	36.79	1.04	0.68	5.15	2.93
6113011203	13.52	21.75	**20-25%**	Yolo	2895	9.05	68.32	22.63	24.56	66.29	0	0	8.19	0.97
6113011204	19.87	37.20	**35-40%**	Yolo	5607	11.2	71.89	16.91	44.73	49.26	0.8	0.34	2.16	2.71
6113011205	19.24	35.70	**35-40%**	Yolo	8168	11.8	79.87	8.33	47.55	33.37	1.6	0	17.06	0.4
6113011206	27.96	54.87	**50-55%**	Yolo	9269	16.82	74.27	8.91	31.09	50.47	0.87	0	13.16	4.4
6113011300	22.41	43.05	**40-45%**	Yolo	9111	14.1	75.34	10.56	52.03	46.35	0.57	0.03	0.14	0.88
6113011400	29.95	58.57	**55-60%**	Yolo	4076	13.71	66.93	19.36	54.1	39.7	1.32	0	0.83	4.05
6113011500	14.06	23.21	**20-25%**	Yolo	5722	13.6	69.66	16.74	53.62	40.49	0.02	0.03	2.27	3.57
6115040100	51.76	89.75	**85-90%**	Yuba	4770	11.93	74.82	13.25	24.4	63.33	2.22	0.94	1.7	7.4
6115040200	31.99	62.39	**60-65%**	Yuba	7981	15.55	73.71	10.74	32.64	61.85	1.88	0	1.34	2.29
6115040301	33.31	64.56	**60-65%**	Yuba	3306	18.69	71.2	10.1	24.65	37.81	2.81	0	23.35	11.37
6115040302	39.38	73.90	**70-75%**	Yuba	2396	23.62	70.62	5.76	45.74	41.82	2.92	0.88	7.3	1.34
6115040303	22.95	44.36	**40-45%**	Yuba	8940	19.77	71.97	8.27	31.86	40.78	8.94	0.86	11.63	5.93
6115040400	49.20	87.01	**85-90%**	Yuba	5434	14.91	76.02	9.07	45.4	32.9	1.95	1.99	11.63	6.13
6115040500	37.86	71.86	**70-75%**	Yuba	4052	17.6	73.99	8.42	43.26	43.81	0.25	1.51	7.97	3.21
6115040600	27.60	54.10	**50-55%**	Yuba	5702	17.1	69.96	12.94	42.9	43.91	3.1	0.81	3.53	5.75
6115040700	22.13	42.41	**40-45%**	Yuba	13334	19.02	73.08	7.9	26.23	53.46	3.42	0.83	9.92	6.13
6115040800	21.59	41.28	**40-45%**	Yuba	4652	10	76.01	13.99	15.82	75.06	0.15	0.99	2.6	5.37
6115040901	30.21	59.13	**55-60%**	Yuba	2720	13.68	65.63	20.7	17.5	63.42	0.74	1.1	10.4	6.84
6115040902	18.67	34.43	**30-35%**	Yuba	1653	14.46	85.54	0	19.78	56.38	8.59	0.18	8.47	6.59
6115041000	21.99	42.13	**40-45%**	Yuba	7298	15.26	63.07	21.66	12.89	77.87	4.03	0.08	2.14	2.99
6115041100	11.69	17.01	**15-20%**	Yuba	4122	7.76	61.79	30.45	9.49	79.14	3.01	0.97	0.41	6.99

Data Dictionary for CES4.0FINAL_results Data Spreadsheet	
Variable Name	**Description**
Census Tract	Census Tract ID from 2010 Census
Total Population	2019 ACS population estimates in census tracts
California County	California county that the census tract falls within
ZIP	Postal ZIP Code that the census tract falls within
Approximate Location	Approximate city where each census tract is located based on US Census Incorporated Places (2020, Cities), US Census Designated Places, (2020, Designated Places), and the CA Department of Tax and Fees City and County Boundaries and City Annexations (2021, Unincorporated Areas) boundary files. All tracts that did not fall within one of these boundaries were assigned "unincorporated county area" based on that tract's county. This is for reference purposes only and should not be used to determine whether a census tract falls within a city or town boundary.
Longitude	Longitude of the centroid of the census tract
Latitude	Latitude of the centroid of the census tract
CES 4.0 Score	CalEnviroScreen Score, Pollution Score multiplied by Population Characteristics Score
CES 4.0 Percentile	Percentile of the CalEnviroScreen score
CES 4.0 Percentile Range	Percentile of the CalEnviroScreen score, grouped by 5% increments
Ozone	Amount of daily maximum 8 hour Ozone concentration
Ozone Pctl	Ozone percentile
PM2.5	Annual mean PM 2.5 concentrations
PM2.5 Pctl	PM2.5 percentile
Diesel PM	Diesel PM emissions from on-road and non-road sources
Diesel PM Pctl	Diesel PM percentile
Drinking Water	Drinking water contaminant index for selected contaminants
Drinking Water Pctl	Drinking water percentile
Lead	Potential risk for lead exposure in children living in low-income communities with older housing
Lead Pctl	Children's lead risk from housing percentile
Pesticides	Total pounds of selected active pesticide ingredients (filtered for hazard and volatility) used in production-agriculture per square mile in the census tract
Pesticides Pctl	Pesticides percentile

Tox. Release	Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration (from RSEI)
Tox. Release Pctl	Toxic release percentile
Traffic	Traffic density, in vehicle-kilometers per hour per road length, within 150 meters of the census tract boundary
Traffic Pctl	Traffic percentile
Cleanup Sites	Cleanup sites, sum of weighted EnviroStor cleanup sites within buffered distances to populated blocks of census tracts
Cleanup Sites Pctl	Cleanup sites percentile
Groundwater Threats	Groundwater threats, sum of weighted GeoTracker leaking underground storage tank sites within buffered distances to populated blocks of census tracts
Groundwater Threats Pctl	Groundwater threats percentile
Haz. Waste	Sum of weighted hazardous waste facilities and large quantity generators within buffered distances to populated blocks of census tracts
Haz. Waste Pctl	Hazardous waste percentile
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
Imp. Water Bodies Pctl	Impaired water bodies percentile
Solid Waste	Sum of weighted solid waste sites and facilities (SWIS) within buffered distances to populated blocks of census tracts
Solid Waste Pctl	Solid waste percentile
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 4.0 Score)
Pollution Burden Pctl	Pollution burden percentile
Asthma	Age-adjusted rate of emergency department visits for asthma
Asthma Pctl	Asthma percentile
Low Birth Weight	Percent low birth weight
Low Birth Weight Pctl	Low birth weight percentile
Cardiovascular Diesease	Age-adjusted rate of emergency department visits for heart attacks per 10,000
Cardiovascular Diesease Pctl	Cardiovascular disease percentile
Education	Percent of population over 25 with less than a high school education

Education Pctl	Education percentile
Linguistic Isolation	Percent limited English speaking households
Linguistic Isolation Pctl	Linguistic isolation percentile
Poverty	Percent of population living below two times the federal poverty level
Poverty Pctl	Poverty percentile
Unemployment	Percent of the population over the age of 16 that is unemployed and eligible for the labor force
Unemployment Pctl	Unemployment percentile
Housing Burden	Percent housing burdened low income households
Housing Burden Pctl	Housing burden percentile
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 4.0 Score)
Pop. Char. Score Pctl	Population characteristics percentile

Data Dictionary for Demographic Profile Tab	
Variable Name	**Description**
Census Tract	Census Tract ID from 2010 Census
CES 4.0 Score	CalEnviroScreen Score, Pollution Score multiplied by Population Characteristics Score
CES 4.0 Percentile	Percentile of the CalEnviroScreen score
CES 4.0 Percentile Range	Percentile of the CalEnviroScreen score, grouped by 5% increments
California County	California county that the census tract falls within
Total Population	2019 ACS population estimates in census tracts
Children < 10 years (%)	2019 ACS population estimates of the percent per census tract of children under 10 years old
Pop 10-64 years (%)	2019 ACS population estimates of the percent per census tract of people between 10 and 64 years old
Elderly > 64 years (%)	2019 ACS population estimates of the percent per census tract of elderly 65 years and older
Hispanic (%)	2019 ACS population estimates of the percent per census tract of those who identify as Hispanic or Latino
White (%)	2019 ACS population estimates of the percent per census tract of those who identify as non-Hispanic white

African American (%)	2019 ACS population estimates of the percent per census tract of those who identify as non-Hispanic African American or black
Native American (%)	2019 ACS population estimates of the percent per census tract of those who identify as non-Hispanic Native American
Asian American (%)	2019 ACS population estimates of the percent per census tract of those who identify as non-Hispanic Asian or Pacific Islander
Other/Multiple (%)	2019 ACS population estimates of the percent per census tract of those who identify as non-Hispanic "other" or as multiple races

SHUTE, MIHALY & WEINBERGER LLP

July 30, 2024

Via Electronic Mail Only

Ms. Sophia Pagoulatos
Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
E-Mail: Sophia.Pagoulatos@fresno.gov

Re: Draft Environmental Impact Report For The Fresno South Central Specific Plan (SCH# 2019079022)

Dear Ms. Pagoulatos:

This firm represents the Leadership Counsel for Justice and Accountability ("Leadership Counsel") in matters relating to the City's South Central Specific Plan ("SCSP", "Specific Plan", or "Project"). The Leadership Counsel has serious concerns about the environmental impacts of the SCSP as currently proposed. The Draft Environmental Impact Report ("DEIR") substantially understates, and fails to fully analyze, the severity and extent of the Project's significant effects on air quality, greenhouse gas ("GHG") emissions, public health, safety, and noise among others. In addition, the Specific Plan is inconsistent with the San Joaquin Valley Air Pollution Control District's Program Air Basin Plan and AB 617 Implementation Program. But none of these impacts or inconsistencies of the Project can be discerned from reading the DEIR. The DEIR is thus inadequate as an informational document and violates the minimum standards of adequacy under the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA "Guidelines," California Code of Regulations, title 14, § 15000 et seq.

The DEIR is deficient under CEQA for multiple reasons. As discussed in more detail below, the DEIR fails to: include an adequate description of the environmental setting or of the Project; fails to adequately analyze and propose mitigation for significant environmental impacts related to air quality, public health, climate change, public safety, and other topics; and fails to analyze the Project's cumulative impacts in any meaningful

way. For example, the DEIR fails to sufficiently discuss how the Project's significant unavoidable air quality impacts translate to adverse health impacts for the thousands of residents[1] of the South Central Fresno communities and adjacent areas. In addition, the numerous vague, voluntary, and unenforceable policies and measures relied on as mitigation in the DEIR fail to comply with CEQA, which requires enforceable, concrete commitments for mitigation. As a result, the DEIR fails to describe measures that could avoid or substantially lessen the Specific Plan's numerous significant impacts. The flaws demand that the DEIR be substantially modified and recirculated for review and comment by the public and public agencies.

The DEIR's failings will most directly and significantly impact low-income, disadvantaged residents and communities, especially communities of color, in South Central Fresno. The City must revise and recirculate the DEIR to provide the public an accurate assessment of the environmental issues at stake, and a mitigation strategy—developed *before* SCSP approval—that fully addresses the Project's significant impacts. The City must also take a serious look at alternatives that can better avoid or lessen most of the Project's significant impacts. The revised DEIR should include the changes to the SCSP requested in the comments submitted by the Leadership Counsel for Justice and Accountability. The proposed revisions to SCSP policies are feasible mitigation measures that can effectively reduce the Project's impacts.

This letter, along with the air quality report prepared by Patrick Sutton, Senior Environmental Engineer, Baseline Environmental, Inc. ("Baseline Report" attached as Exh. A) constitute our comments on the DEIR. Please refer to the Baseline Report for further detail and discussion of the DEIR's inadequacies with regard to air quality impacts.

I. The DEIR's Flawed Project Description Does Not Permit Meaningful Public Review of the Project.

Under CEQA, the inclusion in the EIR of a clear and comprehensive description of the proposed project is critical to meaningful public review. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193 ("*Inyo II*"). The court in *Inyo II* explained why a thorough project description is necessary:

> "A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may

[1] https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/communityhub-2-0/south-central-fresno

> affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance."

Id. at 192-93. Thus, "[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 830.

Here, the DEIR fails to adequately describe aspects of the Project that are essential for the DEIR to provide a meaningful environmental analysis. In some instances, the DEIR presents an incomplete, unclear, and misleading description of allowed uses within the Plan Area. For example, the DEIR indicates that three types of warehousing, storage, and distribution uses are allowed within the proposed 1,000 feet "buffer" around sensitive uses as long as these uses "meet CARB criteria for zero emission facilities, as defined in CA Sustainable Freight Action Plan (July 2016) (sic). DEIR at 3-30. However, the SCSP states that these same uses "Must meet CARB criteria for zero *or near zero* emission facilities, as defined in CA Sustainable Freight Action Plan (July 2016)[2]. SCSP at page 71; emphasis added. Therefore, the DEIR presents a description of uses that is inconsistent with the SCSP, and does not evaluate impacts from allowing "near zero emission facilities" to be located within the 1,000-foot buffer.

Moreover, the state's Sustainable Freight Action Plan does not appear to include a list of criteria for facilities to be considered zero emission or near-zero emission and the DEIR fails to disclose any details about the required criteria. Thus, the public and decision-makers have no way of understanding how uses would qualify as "zero or near-zero facilities," reduce emissions, or compare to other warehouse. The California Sustainable Freight Action Plan does not define the term "near- zero" at all so the SCSP's use of the term begs the question as to what constitutes "near-zero emissions." This lack of clarity indicates that warehouse, storage, and distribution uses that emit pollutants will in fact be allowed within 1,000 feet of sensitive uses.

In another example, the DEIR's description of the Project fails to disclose the number of truck trips that would result from implementation of the SCSP. The DEIR makes a single reference to the fact that the plan would result in an additional 72,241 trips per day. DEIR at 4.3-29. Yet, it fails to elaborate on how many of these trips would be due to heavy duty trucks, including diesel-powered haul trucks, and how many would be automobiles. This information is important because diesel trucks create greater

[2] https://ww2.arb.ca.gov/our-work/programs/california-sustainable-freight-action-plan

environmental impacts including more particulate matter, more traffic safety issues, significant road deterioration, and a higher level of noise.

The SCSP and the DEIR also present contradictory, misleading information regarding the level of protection proposed SCSP policies and standards would provide sensitive uses and residents. The SCSP states that the "Plan seeks to improve the quality of life" of residents in the Plan Area. SCSP at 40. The SCSP Guiding Principles include decreasing "land use intensity of undeveloped parcels surrounding sensitive uses" applying setback requirements for industrial uses, and "establishes being a good neighbor in part by "locating high intensity land uses away from sensitive uses." SCSP at 40 and 41. Similarly, the DEIR states that Project characteristics include providing buffers from sensitive uses. DEIR at 2-2, 3-12, 2-48.

Despite these declarations, the SCSP as proposed would allow many polluting uses near residents and sensitive uses. It expressly allows three types warehousing uses and "Limited Industrial" uses, the latter of which is not defined in the SCSP, DEIR, or the City's Zoning Code. SCSP at 71 and DEIR at 3-30. The harmful impacts resulting from warehousing uses are well known to include harmful criteria pollutant emissions, loud noise from loading docks, light pollution, and truck traffic 24 hours a day. Yet the SCSP's proposed development standards include minimal setbacks that are unlikely to protect residents. For example, the specified building setback between industrial uses and sensitive uses is only 100 feet, and even this standard is optional. *See*, DEIR at 3-30 [The buildings *should* setback a minimum of 100 feet when sharing the same property line.] Neither the SCSP nor the DEIR offer any explanation for how this setback distance was derived. Even if the 100-foot setback distance is adequate to protect area residents, which there is no evidence to support, the wording of this standard is optional and unenforceable, thereby negating any potential benefits.

In addition, the DEIR is unclear about exactly which proposed land uses will be allowed adjacent to sensitive land uses. *See*, DEIR Figure 3-16, showing proposed land uses and 1000-foot buffer areas. Specifically, the colors used to indicate Neighborhood Mixed Use and Regional Business Park are so similar as to be indistinguishable from each other. The distinction is important because the two designations allow very different uses. As discussed above, the Regional Business Park designation allows warehouse and limited industrial uses. By contrast, the Neighborhood-Mixed Use designation allows residential uses and local-serving, pedestrian-oriented commercial development, such as convenience shopping and professional offices in two- to three-story buildings. Yet, a reader reviewing the maps presented in the DEIR cannot decipher which use is which.

Finally, the proposed SCSP does not, in fact, "buffer" residential areas and schools from polluting industrial uses. As shown in DEIR Figure 3-16 SPLU Proposed Buffers, intensive uses such as Business Park, Regional Business Park, and Light and Heavy Industrial uses continue to be allowed within the so-called buffer. Furthermore, the DEIR fails to clearly describe the uses allowed in each proposed land use designation. This failure implicates the analysis of plan-related impacts. A revised DEIR should present a clear description of allowed uses, a corrected and thorough evaluation the transportation, air quality, greenhouse gas, light, and noise impacts associated with a higher level of such uses in the planning area, proposed measures to minimize impacts and an explanation of any residual impacts remaining after mitigation. Analyzing the potential future development in the Plan Area is an integral part of the Project and must be analyzed in this EIR. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713.

II. The DEIR's Analyses of and Mitigation for the SCSP'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 DEIR fails to analyze the Project's numerous environmental impacts, including those affecting air quality, greenhouse gas emissions, and public health and safety. In addition, in numerous instances, the DEIR also fails to adequately analyze the Project's cumulative impacts. These inadequacies require that the DEIR be revised and recirculated so that the public and decision-makers receive 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").

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(c) (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 "programmatic" nature of this DEIR 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 DEIR for the SCSP 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 DEIR finds that the City's plans for future growth and development as set out in the SCSP will result in significant and unavoidable impacts in six different topic areas. DEIR at 2-6 to 2-55. As detailed below, in numerous instances, the DEIR fails to thoroughly assess impacts deemed to be significant or to identify additional feasible mitigation measures to reduce the severity of impacts, especially ones that remain significant even after mitigation. Therefore, the DEIR, here, fails to provide the legally required analysis of the substantial industrial growth that the Specific Plan allows and promotes. Thus, the City must revise the DEIR to accurately analyze and mitigate the Plan's significant impacts.

A. The DEIR Fails to Adequately Analyze and Mitigate the SCSP'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. As the DEIR acknowledges, the southern portions of the City, including the South Central planning area, experience poor air quality due to a large concentration of industrial uses and high volumes of truck traffic. DEIR at 4.3-13. South Central Fresno was prioritized and selected by the California Air Resources Board (CARB) for additional emissions monitoring, adoption of a community emission reduction plan inclusive of measures that will result in quantifiable emission reductions, and investment of additional resources under Assembly Bill 617 due to the community's disproportionate cumulative air pollution exposure burden. Therefore, it is imperative that the DEIR provide an accurate assessment of the SCSP's potential to further degrade air quality and public health.

By the DEIR's own admission, implementation of the Specific Plan would cause a substantial increase in air pollution that would expose sensitive receptors to substantial additional pollution concentrations. DEIR at 2-15. However, as described below and in the Baseline Report, the DEIR's analysis of air quality impacts fails to include recent information reflecting the baseline condition, grossly underestimates project-related increases in air pollutants, and presents inadequate mitigation. Furthermore, the DEIR fails to adequately analyze the Specific Plan's consistency with Assembly Bill 617 programs for the Plan Area. In addition, the DEIR includes a faulty analysis of plan-related health risks. Baseline Report at 6-13. Thus, the DEIR'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 of these impacts remain unknown because the DEIR does not provide anything close to a complete analysis of these issues. These egregious flaws in the air quality analysis are described below. In addition, we incorporate by reference the letter dated July 29, 2024 from Baseline Environmental, Inc. ("Baseline Report").

1. Inconsistency with Assembly Bill 617

Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017) addresses air pollution impacts in environmental justice communities and requires CARB and local air districts to develop and implement additional emissions reporting, monitoring, reduction plans and measures in an effort to reduce air pollution exposure in the most impacted

communities. https://community.valleyair.org/ As discussed above, in 2018, South Central Fresno was one of the first communities selected by CARB for investment of additional resources under AB 617. As pointed out by the Attorney General's Office in their Notice of Preparation ("NOP") comments, the SJVAPCD has been implementing the South Central Fresno Community Emissions Reduction Program ("CERP") since it was adopted in early 2020. *See*, Letter from Deputy Attorney General, Scott Lichtig, dated July 22, 2019 at 7 and 8.

The DEIR states that the SCSP:

> "is intended—to build upon the policy framework established by the following previously adopted plans, including the Community Emissions Reduction Program: South Central Fresno (2019, San Joaquin Valley Air Pollution Control District): an emissions reporting, monitoring, and reduction plan that was *developed under AB 617 to reduce air pollution exposure in disadvantaged communities*.

DEIR at 3-10; emphasis added.

However, while the State is investing substantial public funds to reduce air pollution in the planning area, the proposed SCSP would directly undercut these efforts, by increasing polluting industrial uses by more than 18 million square feet, resulting in significant unavoidable impacts. *See*, e.g., SCSP at DEIR at 2-1, 2-8. 2-15, 3-5, 4.3-19, 4.3-24. 4.3-28, 4.3-33. As the DEIR admits "[I]mplementation of development under the proposed plan would intensify urbanization in the Plan Area, which would in turn increase criteria air pollutants and ozone precursors in an area that is currently designated as an extreme nonattainment area with respect to the NAAQS." DEIR at 4.3-26. Thus, the proposed Specific Plan would increase pollutant emissions at a scale that could negate expected benefits from implementation of the South Central Fresno CERP.

As explained in the Attorney General's Office NOP comments, "[T]he City's EIR must account for how additional industrial development will comply with the existing legal requirement that emissions be reduced in this area." *See*, Letter from Deputy Attorney General, Scott Lichtig, dated July 22, 2019 at 8. Although the DEIR acknowledges requirements to reduce pollution emission reductions under AB 617, the DEIR fails to analyze the proposed SCSP's consistency with the CERP and AB 617 generally. *See*, DEIR at 3-10, 4.3-12 and 4.3-13 (describing AB 617), and at 4.3-19 and 4.3-20 (analysis of the proposed Specific Plan's consistency with applicable air quality

plans *omitting* analysis of consistency with AB 617). This approach does not comport with CEQA.

In *Banning Ranch*, the California Supreme Court unequivocally held that CEQA prohibits lead agencies from "perform[ing] truncated and siloed environmental review, leaving it to other responsible agencies to address related concerns seriatim." *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 941. Despite the Supreme Court's admonition, here the DEIR takes a similar approach to the approach invalidated in *Banning Ranch*. The DEIR omits any analysis of the Project's consistency with AB 617 and consistency with the associated 'Community Emissions Reduction Program: South Central Fresno' (2019, San Joaquin Valley Air Pollution Control District), and simply ignores how developing in the Planning Area will impair emissions reductions in the area. In *Banning Ranch,* the Supreme Court held this approach was unlawful. 2 Cal.5th at 940-41. Here as well, this DEIR's omission violates CEQA as a matter of law. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 510 ("*Friant Ranch*").

2. The DEIR's Study Area Boundary Ignores CARB's South Central Fresno Community Emissions Reduction Program Boundary Thereby Failing to Properly Describe the Existing Setting.

Moreover, CARB's CERP boundary for the South Central Fresno area and surrounding area, encompasses most of the City Fresno and captures many of the small unincorporated communities nearby. *See*, SCSP Figure 1-7 at 17. The DEIR appears to use the SCSP boundary as the study area for air quality analysis. However, because air pollutant emissions are not contained within arbitrary map boundaries, the DEIR should have used an expanded study area that captures all impacted sensitive receptors, including those outside the SCSP area boundary. Expanding the study boundary would both ensure consistency with the CERP and AB 617, but would also capture the full impacts of the SCSP on surrounding sensitive receptors.

3. The DEIR Fails to Consider Existing Impacts as Part of the Environmental Setting.

The DEIR fails to fully describe the Project setting, including impacts that would occur outside of the project boundary, as CEQA requires. CEQA Guidelines § 15125(a). This description of the environmental setting constitutes the baseline physical conditions by which a lead agency determines the significance of an impact. *Id*. "Knowledge of the regional setting is critical to the assessment of environmental impacts." CEQA

Guidelines § 15125(c). Without such an understanding, any impacts analysis or proposed mitigation becomes meaningless.

Here, as explained in the Baseline Report, the DEIR fails to incorporate critical findings from the Truck Reroute Study, its associated Fresno Health Impact Assessment ("Fresno HIA"), and the Downtown Neighborhoods Community Plan ("DNCP") regarding the severity of existing air quality and health risk conditions in the Plan Area and City of Fresno. Baseline Report at 9 and 10. Based on the findings of adverse health conditions in the Fresno HIA, the Truck Reroute Study applied a 1,000-foot buffer around proposed truck routes to determine where truck-regulated areas would be most beneficial to reduce health risks. Baseline Report at 9. As shown in Figure 1 of the Baseline Report, Proposed Truck Routes with 1,000-foot Buffer in the Plan Area would affect substantially more sensitive receptors than the 500-foot setback from highways as evaluated in the DEIR. Baseline Report at 12.

In addition, a 2015 health risk assessment prepared for the DNCP (immediately adjacent to the SCSP area) showed particulate matter concentrations from vehicle emissions near SR 99, SR 41, and SR 180 in the DNCP area indicate existing cancer risk to sensitive receptors exceeds 100 in a million at distances from 1,000 to 5,000 feet from the freeways. Baseline Report at 9. That study recommended that any new residential development in areas with a cancer risk above 100 in a million incorporate ventilation systems with a Minimum Efficiency Reporting Value (MERV) 13 or higher to clean particulate matter from indoor air. *Id.* The City of San Francisco similarly adopted a requirement for MERV 13 ventilation systems for new residential development where cancer risk is above 100 in a million. Therefore, by omitting data and recommendations from these reports, the DEIR failed to incorporate information about the existing baseline conditions and impacts in the SCSP area. *Id.* at 13.

SCSP Policy T-3: Limit truck idling times states that "Recommendations that result from this (Truck Route) Study shall be adopted by reference in this Plan." SCSP at 136. However, the fact that recommendations in the Truck Route Study will be incorporated into the Plan does not excuse the City from including baseline information from the Truck Route Study into the DEIR. The Truck Route Study, along with its HIA, should be incorporated into the DEIR evaluation and the analysis recirculated for public review. Moreover, there is no excuse for failing to include data and analysis from the health risk assessment prepared for the DNCP, which was published nine years ago.

Describing existing conditions is critical because they affect analyses of multiple issue areas, such as impacts to air quality, public health, and public safety, among others. A revised DEIR should include the data from the Truck Reroute Study and the Fresno

HIA to accurately describe the existing setting of the Plan Area. Once that information is incorporated, the DEIR should be revised to incorporate the 1,000-foot buffer distance used by the Truck Reroute Study as well as a buffer from major roadways recommended in the Fresno HIA. *Id.* The DEIR should also be revised to evaluate existing cancer risk from freeways and major roadways in the Plan Area. *Id.* Only then can the DEIR properly evaluate air quality impacts from increased truck and automobile traffic on sensitive receptors in the Plan Area.

4. The DEIR Presents a Flawed Criteria Air Pollutants Analysis and Proposes Vague Unenforceable Mitigation Measures.

The DEIR's analysis of the SCSP's impacts related to increased criteria air pollutants is critically flawed in at least two ways. First, the DEIR's analysis of expected criteria pollutants is incorrect, such that resulting emissions would be significantly higher than disclosed in the DEIR. Second, the DEIR's identified measures for mitigating admittedly significant impacts related to criteria pollutants are vague and unenforceable. These flaws are discussed in more detail below.

a. The DEIR's Analysis of Criteria Air Pollutants Uses Flawed Methodology That Grossly Underestimates the SCSP's Emissions.

The DEIR states that criteria pollutant emissions from construction of the development under the SCSP will be below applicable thresholds of significance and therefore less-than-significant. DEIR at Tables 4.3-4 and 4.3-5, 4.3-25 and 4.3-26. However, as explained in detail in the attached Baseline Report, the DEIR analysis suffers from a series of errors that substantially understates its emissions estimates. Specifically, in the two construction scenarios evaluated, the DEIR underestimates emissions by failing to account for seven years of construction in one scenario and accounting for only a small fraction of emissions in the second scenario. Baseline Report at 2-4. The result is that actual criteria pollutant emissions during construction would be substantially higher than disclosed in the DEIR. Critically, reactive organic gases, or ROG, emissions would be 61% higher and nitrogen oxide, or NOx, emissions would be 448% higher than disclosed in the DEIR. Baseline Report at 3.

These flaws are particularly important because these emissions would expose workers and nearby residents to health risks from exposure to particulate matter, ROG, NOx, and other toxic air contaminants. It is well documented that short-term exposure to PM10 is associated with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease (COPD), leading to hospitalization and emergency

department visits. *See*, https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm. Long-term exposure (months to years) to particulate matter is linked to respiratory mortality and lung cancer. *Id*.

As discussed above and in the Baseline Report, the Specific Plan as proposed would result in exceedance of applicable thresholds for ROG, also known as volatile organic compounds (VOCs), NOx. Baseline Report at 3 and 4. The increased levels of ROG and NOx emissions would increase health risks to area residents. For instance, according to CARB,

> "controlled human exposure studies that show that NO2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses."

https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health. VOCs can also lead to problems with the lungs, central nervous system, kidney and liver, function, and cancer. *See*, "Health effects of volatile organic compounds", attached as Exh. B. Moreover, given that the Plan Area already bears a disproportionate burden of industrial pollution and vehicle emissions in the region, even a small amount of added pollutant emissions will result in significant added impacts. *See*, *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019 ("*LA Unified*"); *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.

The DEIR must be revised to correct the aforementioned errors and to disclose the full extent and severity of the proposed SCSP's criteria pollutant impacts. Once the analysis is corrected, the revised DEIR must be recirculated to allow the public and decision-makers to review and comment on the new information.

b. The DEIR's Proposed Mitigation Measures to Address the Project's Significant Criteria Air Pollutants Are Inadequate Under CEQA.

An EIR is inadequate if its suggested 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 at 79. The City may not use the inadequacy of its impacts review to avoid mitigation: "The agency should not be allowed to hide behind its own failure to collect data." *Sundstrom v. County of*

Mendocino (1988) 202 Cal.App.3d 296, 306. The formulation of mitigation measures may not be improperly deferred until after Project approval; rather, "[m]itigation measures must be fully enforceable through permit conditions, agreements, or legally binding instruments." CEQA Guidelines § 15126.4(a)(2). Here, the DEIR's identification and analysis of mitigation measures, like its analysis of impacts, are legally inadequate. The DEIR's proposed measures to mitigate the admittedly significant impacts related to criteria air pollutants fall far short of meeting CEQA's requirements.

Below are some examples of unclear and inadequate mitigation measures:

Mitigation Measure 4.3-1a: Prepare an Ambient Air Quality Analysis and Mitigation Plan or Voluntary Emissions Reduction Agreement

"[P]rior to future discretionary project approval, and once all feasible on-site reduction measures have been incorporated, development project applicants shall prepare and submit … an AAQA to determine whether any SJVAPCD annual mass emissions thresholds are exceeded or if a future project's emissions may result in the violation of an AAQS. If no thresholds are exceeded, no further action is necessary. If one or more thresholds are exceeded, prior to the issuance of Certificates of Occupancy, future development will engage in a voluntary emissions reduction agreement (VERA) through coordination with SJVAPCD to reduce emissions to meet SJVAPCD's annual mass emissions thresholds for any pollutant that exceeds the respective threshold. (Emphasis added.)

As an initial matter, the City provides no justification for confining this and other measures to discretionary projects. At the planning stage, the City can and should require all ministerial and discretionary to comply with mitigation measures to better reduce the Project's environmental impacts.

It is also unclear what this mitigation measure is referring to when it states that "all feasible on-site reduction measures have been incorporated." If the measure requires measures MM 4.3-1b through 4.3-1l to be implemented, the measure should be revised to expressly say so.

Mitigation Measure 4.3-1b: Use Clean Fleets during Construction

"For any on-site equipment that cannot be electric-powered, and diesel-powered equipment is the only available option, construction contractors shall use equipment that either uses only high-performance renewable diesel or meets EPA Tier 4 emissions standards." (Excerpt.)

The Tier 4 Final emissions standards substantially reduce NOx emissions by about 80 percent or more compared to the Tier 4 Interim emission standards; therefore, the DEIR should clarify the use of Tier 4 Final emissions standards.

The DEIR fails to define the term "high-performance renewable diesel." Blends of renewable diesel and conventional diesel are labelled with an R followed by the percentage (by volume) of the renewable diesel content. For example, R100 is 100% renewable diesel, whereas R65 is 65% renewable diesel blended with conventional diesel. Studies prepared by CARB (*see*, CARB's Low Emission Diesel Study Final Report, attached as Exh. C.) found that the NOx and PM emissions from a Tier 4 Final engine versus a lower tier engine that uses R100 are similar. However, testing of R65 and R50 diesel blends in lower tier engines resulted in either the same or increased emissions of NOx, respectively, compared to conventional diesel fuel. Therefore, the DEIR should clarify that use of R100 is required.

Mitigation Measure 4.3-1d: Implement Dust Control Measures

"This shall be enforced by the City with verification by SJVAPCD." (Excerpt.)

SJVAPCD already requires preparation of a Dust Control Plan in accordance with Reg VIII. This measure should be revised to clarify that these additional measures shall be included in the Dust Control Plan already required to be submitted to SJVAPCD.

Mitigation Measure 4.3-1f: Reduce Emissions from Architectural Coatings

"This shall be enforced by the City with verification by SJVAPCD." (Excerpt.)

This measure is unclear about how the SJVAPCD will verify compliance with the measure.

Mitigation Measure 4.3-1h: Use Low- or Zero-Emission Heavy-Duty Trucks and Equipment

"Future tenants of new and redeveloped commercial and industrial land uses (those over which the City will have discretionary approval) shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2026"

This measure is vague and leaves many questions unanswered. For example, how will the City expedite, monitor, and enforce the transition to zero emission vehicles? How

does the City define “commercially available” and “domiciled on the project site”, and what is considered “adequate electrical infrastructure”? A revised measure should include clear performance standards for how fleet transition will take place and clarify overall what parts of the measure apply to trucks versus off-road equipment.

Mitigation Measure 4.3-1i: Use Low- or Zero-Emission Vehicles

This measure, which requires future tenants of new and redeveloped commercial and industrial land uses within the plan area to transition to zero emission vehicle fleets, is vague regarding how the City will monitor and enforce milestones for transitioning to zero emission.

Mitigation Measure 4.3-1m: Reduce Off-Site Emissions

This measure would allow projects to implement off-site emissions reduction strategies or programs, once all on-site measures (i.e., Mitigation Measures 4.3-1a through 4.3-1i) have been exhausted. This measure should be revised so that it is required if Mitigation Measure 4.3-1a cannot mitigate impacts below the applicable thresholds. This revision would ensure that on-site emission reductions, which are more effective for reducing impacts on local residents, are implemented first before off-site emission reductions are sought.

Furthermore, the ability for future projects to effectively reduce off-site emissions of criteria air pollutants is speculative. In accordance with CEQA Guidelines 15126.4(a)(2), feasible mitigation measures must be fully enforceable. For an emission offset program to be considered feasible mitigation, the emission reductions must be genuine, quantifiable, additional, and verifiable at the time of preparation of the EIR (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467). The availability of criteria air pollutant emission offsets for future projects to purchase on an ongoing and annual basis is speculative due to potential limitations on offset availability. Therefore, the use of an emissions offset program cannot be used to guarantee that criteria air pollutant emissions from future developments under the proposed plan would meet the SJVAPCD’s thresholds of significance.

In short, the revised DEIR should change the proposed mitigation measures to ensure they are clear, feasible, and enforceable. Only then can the City rely on the mitigation measures to reduce the Project’s significant criteria pollutant impacts.

5. The DEIR Fails to Adequately Analyze the SCSP's Potential to Impact Public Health.

It is well-established that living close to high traffic areas and exposure to the associated emissions leads 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 Exh. D and "Air pollution impacts from warehousing in the United States uncovered with satellite data", July 24, 2024, attached as Exh. E. Here, despite the fact that implementation of the SCSP would result in significant air pollution emissions, the DEIR fails to adequately analyze health risks of plan-related exposure of nearby sensitive receptors to emissions of toxic air contaminants ("TACs") resulting from future increased industrial uses, truck traffic, and vehicle miles travelled ("VMT"). These flaws are discussed further below and in the attached Baseline Report.

a. The DEIR Fails to Disclose the Severity and Extent of Cancer-Risk from Plan-Related Construction Emissions.

The DEIR's analysis of the Project's potential to expose sensitive receptors to TACs (e.g., diesel particulate matter ("PM") during construction) is incomplete and inaccurate. As explained in the Baseline Report, the DEIR states that "construction-related TAC emissions for any given project would not expose existing sensitive receptors to an incremental increase in cancer risk greater than 20 in 1 million or a hazard index greater than 1.0." DEIR at 4.3-29 and Baseline Report at 6 and 7. The DEIR relies in large part of the "relatively short duration" of construction activity near any particular receptor as a basis for the statement, however, the DEIR fails to provide supporting evidence for this conclusion. *Id.*

In fact children exposed to airborne carcinogens, such as diesel PM from construction activities lasting more than six months can suffer considerable health effects. This is because children are about 10 times more susceptible to health effects from exposure to TACs than adults. *See*, Office of Environmental Health Hazard Assessment (OEHHA). February, 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, attached as Exh. F. In addition, children have a higher breathing rate per body mass and typically spend a higher fraction of time at home compared to adults. Baseline Report at 5. When these characteristics are taken into account, a child is about 48 times more susceptible to cancer risk from exposure to TACs than an adult. *Id.* This means a child exposed to one year of diesel PM emissions from construction would have the equivalent cancer risk to an adult exposed to the same level of diesel PM emissions over 48 years. *Id.* Therefore, the DEIR's reliance on the

"relatively short duration" of construction activities is inadequate justification for dismissing construction-related health risks, especially in regard to the health risks posed to children.

In addition, as described in the Baseline Report, there are numerous examples of health risk assessments performed in California that demonstrate sensitive receptors exposed to diesel PM during construction can result in a cancer risk greater than 20 in a million. Baseline Report at 5. One such assessment that the City of San Francisco prepared to evaluate potential cancer risk from construction under their proposed Housing Element, indicated that construction of a 200-unit apartment complex with 3,000 square feet of retail uses would result in a cancer risk greater than the SJVAPCD's threshold of 20 in a million. That study showed that cancer risk for receptors could range from 173 in a million for adjacent receptors and 21 in a million for receptors within 328 feet from construction sites. Given the size of the SCSP Plan Area, it is foreseeable that some sites could propose projects of similar size and intensity. Therefore, it is not only plausible, but foreseeable, that cancer risk from construction sites in the plan area would result in significant impacts, especially to children.

Finally, the DEIR fails to evaluate potential health risks associated with emissions of total organic gases from passenger vehicles. As discussed in the Baseline Report, projects resulting in substantial passenger vehicle traffic and associated emissions also expose sensitive receptors to cancer risk. Other cities include total organic gasses in their evaluations of health risk. This EIR should do so as well.

b. The DEIR Fails To Adequately Analyze and Mitigate Health Impacts to Residents Living Close to Truck Routes.

As the DEIR acknowledges, implementation of the SCSP as proposed would result in a massive increase in industrial uses, truck traffic, and VMT, which as discussed above, will introduce new sources of TACs that would exacerbate the already adverse conditions of the South-Central community. DEIR at 4.3-28 and Baseline Report at 9. This will result in increased pollutant emissions and public safety and public health risks.

c. The DEIR's Health Risk Analysis Improperly Applies Project-Level Cancer Risk Thresholds.

The DEIR ultimately concludes that the impacts related to TACs exposure would be significant, but the associated mitigation measure reveals another flaw. Mitigation Measures 4.3-3a, b, and c require each future proposed projects in the Plan Area to a

conduct segmented health risk assessments and to implement recommendations from the health risk assessments to ensure that cancer risk to nearby receptors is at or below SJVAPCD's threshold of 20 in one million. DEIR at 2-15 to 2-17 and Baseline Report at 9 and 10. However, the DEIR erred when it applied the SJVAPCD project level threshold to segmented pieces of future projects, even though cancer risk is a cumulative condition. *Id.*

Instead, as explained in the Baseline Report, the DEIR should have summed potential cancer risks to sensitive receptors exposed to TACs from construction, operational permitted sources, operational truck activity, and other sources. After these sources are summed, they should be compared to the project-level cancer risk threshold of 20 in one million. *Id.* By applying the cancer risk threshold in a piecemeal fashion to each source of project-related TAC emissions, individual projects could generate a cancer risk as high as 60 in a million at nearby sensitive receptors.[3] This level of pollution exposure is not supported by the SJVAPCD, and is especially unacceptable given the extremely high levels of existing poor air quality and pollution burden in the South-Central Fresno community. The result is that, despite the DEIR's conclusion that impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be significant even after mitigation, the DEIR fails to disclose the full extent and severity of this foreseeable impacts.

Furthermore, the DEIR fails to support the use of SJVAPCD's project-level cancer risk threshold of 20 in a million. Baseline Report at 7. The project-level threshold is inappropriate because, as discussed above, it does not account for the additive impacts of potential cancer risks to sensitive receptors exposed to TACs from construction, operational permitted sources, operational truck activity, and other sources. Therefore, it does not evaluate cumulative health risks. In addition, the project-level threshold fails to take into account the existing levels of air pollution and health risks in the Plan Area, and the fact that communities of color in the Plan Area are experiencing higher health risks for the same exposures to pollution. Baseline Report at 7 and 8 and UC Merced Fresno Community Environmental Health Impact Assessment, attached as Exh. G. In 2015, a health risk assessment was prepared for the Downtown Neighborhoods Community Plan in the City of Fresno,[4] which is located adjacent and to the north of the Plan Area. The

[3] 20 in a million for construction + 20 in a million for permitted sources + 20 in a million for truck activity = 60 in a million.

[4] FirstCarbon Solutions, 2015. Health Risk Assessment Report: Downtown Neighborhoods Community Plan, Fulton Corridor Specific Plan, and the Downtown

study modeled diesel PM concentrations from vehicle emissions along State Route (SR) 99, SR 41, and SR 180 in the DNCP area and found that the existing cancer risk to sensitive receptors exceeded 100 in a million at distances ranging from about 1,000 to 5,000 feet from the freeways.

As explained in the Baseline Report, other jurisdictions have developed thresholds of significance to account for poor existing air quality conditions, the existing health risks in the community including receptors more vulnerable to air pollution, and the cumulative health risks associated with exposure to air pollution from new development. *Id.* In San Francisco, for example, if the existing health risk at receptors already meet or exceed substantial pollutant concentrations defined for the area, then an excess cancer risk at or above 7 per million from a project is considered a substantial health risk. Baseline Report at 10-11.

Similarly, the South Coast Air Quality Management District is currently developing updated guidance for evaluating cumulative air quality impacts from increased concentrations of TACs for projects in the South Coast Air Basin. The guidance is considering a range of project-level cancer risk thresholds ranging from as low as 1 in a million to as high as 10 in a million based on the existing cancer risks from air pollution in the basin, proximity to high volume diesel-fueled mobile sources, and the protection of AB 617 communities, as well as other criteria. *Id.* Given that the South-Central Fresno AB 617 Community experiences similar or more severe air pollution burden than communities in San Francisco and the South Coast Air Basin (e.g., Los Angeles), the DEIR should be revised to use a more conservative project-level cancer risk threshold to evaluate if development under the proposed plan would expose sensitive receptors to substantial air pollutant concentrations. *Id.*

6. The DEIR's Analysis of Cumulative Health Risks for Polluting Emissions Fails to Account for Significant Impacts to All Affected Receptors.

The DEIR's analysis of cumulative health risks from toxic air contaminants fares no better than the rest of the air quality analysis. The cumulative health risk analysis fails in two ways. First, the DEIR failed to properly evaluate the cumulative health risks for new sensitive receptors that would be exposed to TAC emissions from highways in the Plan Area. As discussed in section III.A.2 and in the Baseline Report, because the health

Development Code Project, City of Fresno, Fresno County, California. Available at: https://www.fresno.gov/wp-content/uploads/2023/04/AppEAQASMBLD.pdf. November 12.

risk analysis only considered impacts to sensitive receptors up to 500 feet from highways, it failed to adequately analyze receptors beyond the 500-foot setback. Baseline Report at 12-13.

Second, the DEIR analysis failed to evaluate the cumulative health risks to existing sensitive receptors in the broader South-Central Fresno AB 617 Community that would be exposed to mobile-source TAC emissions generated by the proposed plan. Instead, the DEIR limits the analysis to the mapped boundary of the SCSP area. As discussed above in section III.A.1, and in the Baseline Report, because the SCSP would generate an additional 72,241 trips per day, a revised DEIR must evaluate health risks for *all* existing receptors who would be exposed to the cumulative mobile-sources toxic air contaminants generated by the proposed plan. Baseline Report at 13.

In sum, the DEIR's analysis of impacts to public health fails to fulfill CEQA's mandate. A revised DEIR must include an accurate analysis of potential air quality impacts that discloses the full extent and severity of impacts to the community in the planning area. Merely stating that an impact will occur is insufficient; an EIR must also provide "information about how adverse the adverse impact will be." *Santiago County Water District*, 118 Cal.App.3d at 831. This information, of course, must be accurate and consist of more than mere conclusions or speculation. *Id.* The revised analysis should take into account the high pollutant exposure burden of the community, consider more appropriate thresholds of significance, and consider truck routes to protect sensitive receptors from additional exposure to toxic air contaminants.

B. The Greenhouse Gas Emissions and Energy Analyses Do Not Comply With CEQA.

1. The DEIR fails to make a clear significance determination or base its conclusions on substantial evidence.

An EIR must make a significance determination regarding a project's potentially significant impacts. *Sierra Watch v. County of Placer* (2021) 69 Cal.App.5th 86, 101–102. "Absent a determination regarding the significance of the impacts …, it is impossible to determine whether mitigation measures are required or to evaluate whether other more effective measures than those proposed should be considered." *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 656. Thus, to effectively evaluate the SCSP's impacts, the DEIR must determine whether the GHG emissions from construction activities will have a significant impact on the environment.

The impact analysis for construction-related GHG emissions uses an improper threshold of significance. Thresholds must be "founded on substantial evidence." *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 206. The DEIR justifies its use of the SMAQMD threshold for evaluating construction-related emissions by stating that "it is tied to meeting the state's long-term GHG reduction targets set by EO B-30-15." DEIR at 4.8-13. But the target set by EO B-30-15 (40 percent below 1990 levels by 2030) has been replaced with more rigorous long-term goals. Exh. H, Executive Order B-30-15. As the DEIR itself states, EO B-30-15's "target was superseded by AB 1279 in 2022, which codifies a goal for … reduction of emissions 85 percent below 1990 levels by 2045." DEIR at 4.8-1; Exh. I, Assembly Bill 1279. Thus, the DEIR uses a threshold of significance that is outdated and does not align with the State's current GHG reduction goals.

In fact, the DEIR elected not to apply SJVAPCD's thresholds of significance in its GHG impact analysis for the same reason: SJVAPCD's thresholds are not "tied to future GHG target years (i.e., 2045, 2050)" and therefore "would not be sufficient to demonstrate consistency with the established milestone years beyond 2030" as required by AB 1279 and the Scoping Plan. DEIR at 4.8-8. Similarly, the SMAQMD threshold used in the construction-related GHG emissions analysis is based on a 2030 target and fails to account for milestones beyond that. The DEIR must use an updated threshold of significance for its analysis of construction-related impacts.

Further, the DEIR fails to make any significance determination regarding construction-related GHG emissions. *Id*. at 4.8-13. The DEIR avoids concluding whether there will be a significant impact on the environment, instead stating that "it is unknown" whether development standards would "reduce emissions below [the] applicable threshold." *Id*. at 4.8-13. In contrast, the DEIR states a conclusion regarding the significance of operation-related emissions. *Id*. at 4.8-16. Although the DEIR concludes that GHG emissions from the Project as a whole will be significant, this is based only on the operation-related emissions and makes no reference to construction. *Id*. at 4.8-12. As a result, the DEIR fails to inform the public and decision-makers on the impacts from the Project's construction phase.

This omission is compounded by the unclear and unsupported impact analysis for construction-related GHG emissions. As discussed in section II.A of this letter above, the DEIR employs a faulty methodology the evaluate criteria air pollutants. The DEIR underestimates emissions by failing to account for seven years of construction in one scenario and accounting for only a small fraction of emissions in the second scenario. Baseline Report at 2-4. The DEIR employs the same faulty method to estimate GHG emissions. The result is that actual GHG emissions during construction would be

substantially higher than disclosed in the DEIR. In addition, the DEIR provides the Project's maximum and average annual GHG emission levels, but does not state which of these two metrics is being compared to the significance threshold of 1,100 MTCO2/year. *Id*. at 4.8-13. The Project's maximum annual GHG emissions falls above the significance threshold, while the average annual GHG emissions falls below the threshold, resulting in ambiguity. Because the DEIR fails to make a significance determination, and one metric falls above the threshold while the other falls below it, it is impossible to ascertain the Project's construction-related impacts. *Id*. at 4.8-13. It is insufficient to merely state the threshold without providing the final significance determination and the analytical steps taken to reach it. *Sierra Watch,* 69 Cal.App.5th at 101–102 (holding that "an agency's conclusion as to whether a given impact is significant is not enough" and "there must also be a disclosure of the analytic route the ... agency traveled"). Moreover, the EIR's ambiguity defeats the core purpose of CEQA: informing the public. *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 391 as modified on denial of reh'g (Jan. 26, 1989) ("The Legislature has made clear that an EIR is 'an informational document' and that '[t]he purpose of an environmental impact report is to provide … the public [] with detailed information about the effect which a proposed project is likely to have on the environment.").

The analysis is similarly unclear in the section on wasteful use of energy. An EIR's energy impact analysis should include a project's "energy requirements and [] energy use efficiencies by amount and fuel type for each stage of the project." CEQA Guidelines, Appx. F § II.C.[5] The DEIR lays out the expected energy needs for each stage of the Project, but fails to ascertain what levels of energy use would be wasteful. It merely states the project "would result in the wasteful, inefficient, or unnecessary use of energy." DEIR at 4.6-11. Because the EIR never determines the amount of energy use that will be "wasteful" before mitigation, it cannot reasonably conclude that mitigation measures will make it less than significant. *California Clean Energy Committee*, 225 Cal.App.4th at 210 (CEQA's "requirements are not satisfied by saying an environmental impact is something less than some previously unknown amount"). But the DEIR does exactly that: it omits this analytical step and jumps straight to the conclusion that the impact from wasteful energy use would be less than significant after mitigation. To comply with CEQA, the agency must make its analytical route clear in the EIR. *Sierra Watch,* 69 Cal.App.5th at 101–102.

[5] EIRs must address applicable considerations from Appendix F. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.

2. The DEIR's GHG and Energy analyses rely on improperly deferred mitigation and inadequate measures.

An EIR must "identify mitigation measures for each significant environmental effect"; it cannot defer "formulation of mitigation measures … until some future time." CEQA Guidelines § 15126.4(a)-(b). The specific details of a mitigation measure can be developed after project approval only where the agency "(1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard." CEQA Guidelines § 15126.4(b).

Here, the EIR's GHG analysis improperly defers mitigation and fails to comply with the above requirements. For example, measure 4.8-1a merely states that future construction will "use low-carbon concrete, minimize the amount of concrete used, and produce concrete on-site if it is more efficient and lower emitting than transporting ready-mix." DEIR at 4.8-17. The goal to "minimize" concrete is not specific enough to commit the agency to any particular mitigation or to allow an objective measurement of success. *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93. Further, the measure fails to set forth any specific performance standards on what constitutes "low-carbon" or "more efficient" concrete. *Sierra Watch,* 69 Cal.App.5th at 110 (mitigation measure inadequate because it provided no specific details on how to achieve the goal of "quieter" construction procedures). Because the measure is "entirely vague," it "offers no instruction on how [any] of these determinations are to be made." *Id*. CEQA demands more than a generalized goal: the EIR must commit to specific mitigation goals by setting performance standards and identifying actions to meet those standards. *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 856 ("Simply stating a generalized goal for mitigating an impact does not allow the measure to qualify for the exception to the general rule against the deferred formulation of mitigation measures.").

Other mitigation measures in the GHG analysis cross-reference measures from other sections, which similarly fall short. For example, measure 4.6-1b[6] requires that new development "incorporate strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits" by implementing "four key strategies: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements." DEIR at 4.6-11. The DEIR fails to elaborate or provide any further detail on its vague strategy of planting trees or using selective vegetation, which

[6] The DEIR cross references to mitigation measure "4.6-2b," which does not exist. This was presumably intended to reference mitigation measure 4.6-1b, and this comment is based on that assumption.

can vary greatly in its effectiveness depending on the species of plants. *See*, Exh. J, "Cooling Effect of Trees with Different Attributes and Layouts on the Surface Heat Island of Urban Street Canyons in Summer." In other words, the "mitigation measure merely proposes a generalized goal of [cooling the urban heat island] and then sets out a handful of cursorily described mitigation measures for future consideration." *Golden Door Properties, LLC,* 50 Cal.App.5th at 520 quoting *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93. This cursory description is insufficient, and the EIR must set forth specific performance criteria that allow for evaluating the efficacy of the mitigation measures.

Measure 4.3-1m is another example of a measure that is inadequate due to its vague description. The measure states that the Project requires "the development of new or participation in existing off-site emissions reduction strategies/programs (e.g., urban forestry programs, local building retrofit programs, off-site EV charger funding, public transit subsidies)." DEIR at 4.3-24. Again, this mitigation measure impermissibly proposes a generalized goal of "off-site emission reduction" and then briefly references potential strategies without further explanation. Moreover, it is impossible to "determine the efficacy" of hypothetical programs in reducing GHG emissions because they have yet to be developed. *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 738 as modified on denial of reh'g (Aug. 8, 2013). In sum, the DEIR violates CEQA by deferring mitigation without providing the requisite detail and performance standards. A revised DEIR must provide further specificity and performance criteria to avoid improperly deferring mitigation.

When a lead agency relies on mitigation measures to find that project impacts will be reduced to a level of insignificance, there must be substantial evidence that the measures will be effective. *Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1027; *Kings County*, 221 Cal.App.3d at 726-29; *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1168. In addition to being effective, mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions or other agreements. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2). An EIR may only rely on measures to mitigate environmental impacts under CEQA if they set forth firm, enforceable commitments to implement those measures. *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). Enforceability is vital because 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.

The DEIR fails to show that its mitigation measures will be enforceable. For example, measure 4.6-1c requires "proposed industrial land uses … to source renewable natural gas." DEIR at 4.6-11. But it later admits that "the City cannot guarantee future industrial businesses would source their natural gas from renewable resources due to limitations regarding enforceability." *Id*. at 4.6-12. The DEIR claims that the other mitigation measures are sufficient and therefore energy impacts will be insignificant, even if the so-called "requirement" for renewable natural gas is not followed. *Id*. In other words, the measure is meaningless: the DEIR touts it as a measure to promote renewable energy and reduce GHG emissions, but concedes and expects its unenforceability and non-compliance.

In addition CEQA requires that an EIR analyze whether a proposed mitigation would itself result in significant impacts. CEQA Guidelines section 15126.4(a)(1)(D); *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986. Some sources of renewable gas contribute to air pollution in their production. For example, policies that promote sourcing gas from livestock operations contribute to air pollution by increasing the intensity of those operations. Dairy operations in the San Joaquin Valley contribute to ozone and particulate matter pollution. For example, large livestock operations account for 57% of ammonia emissions in the San Joaquin Valley air basin. *See*, Environmental Protection Agency, Technical Support Document, EPA Evaluation of PM2.5 Precursor Demonstration, San Joaquin Valley PM2.5 Plan for the 2006 PM2.5 NAAQS.[7] In addition to the health risks of ammonia exposure on its own, ammonia reacts with nitrogen oxides (e.g., NOx) and contributes to the formation of ammonium nitrate, a fine particulate matter ("PM2.5"). Ammonium nitrate comprises a large portion of the PM2.5 in the San Joaquin Valley. For example, ammonium nitrate comprises 38 percent of the PM2.5 mass on an annual average basis in Bakersfield, and 61 percent on high PM2.5 days. *See,* San Joaquin Valley Air Pollution Control Dist., 2018 Plan for the 1997, 2006, AND 2012 PM2.5 Standards at 3-2 to 3-3 (Nov. 15, 2018). [8]As large dairy operations continue to grow in the San Joaquin Valley air pollution from those facilities will similarly increase. Therefore, a revised DEIR must evaluate the potential impacts of this proposed measure.

Moreover, the DEIR fails to show that its mitigation measures will be effective. In the case of measure 4.6-1c, as discussed above, its effectiveness cannot be substantiated

[7] Available at https://www.regulations.gov/document/EPA-R09-OAR-2019-0318-0005.
[8] Available at https://perma.cc/6GMN-J3MC.

at all given that it cannot be enforced. And the other measures similarly lack support. For example, measure 4.6-1b describes planting trees, landscaping, cool roofing, and cool pavements as "key strategies" to reduce energy use. *Id*. at 4.6-11. But it provides no evidence, let alone substantial evidence, on the efficacy of those strategies in reducing energy. Despite lacking evidence for the effectiveness of several mitigation measures, the DEIR nonetheless concludes that the impacts of energy consumption will be less than significant after mitigation. *Id*. at 4.6-13. The DEIR's hollow and unsupported measures fail to meet CEQA's standard of enforceable and effective mitigation.

Where a project will have significant environmental impacts, the EIR must adopt any "feasible mitigation measure available that [will] substantially lessen" the severity of the impact. Pub. Res. Code § 21002; CEQA Guidelines § 15126(a). Here, the DEIR finds that energy consumption will have a significant impact, but it leaves feasible mitigation on the table. For example, measure 4.6-1d requires only 50% of on-site energy to come from renewable sources for buildings under 400,000 square feet. DEIR at 4.6-11; SCSP at 75. But a greater level of renewable energy would further reduce the severity of the impact from energy consumption. It is feasible to require 100% of on-site energy to be renewable, as evidenced by mitigation measures for other recent development projects. *See*, *e.g.* Mariposa Industrial Park Final EIR[9] at 2-9 (requiring all buildings to have sufficient solar panels to provide 100% of the operation's base and future power demand). Yet the DEIR stops short of such feasible mitigation, requiring only half of the energy demand in new developments under 400,000 square feet to be supplied by on-site renewable energy. By leaving such a large gap in feasible mitigation, the Project unnecessarily increases the environmental impact from emissions. To comply with CEQA, the EIR must increase the minimum level of renewable energy to the highest feasible amount.

C. The DEIR fails to adequately disclose the Project's increase in VMT.

An EIR is an informational document at its core. *See* CEQA Guidelines § 15002(a)(1) (one of the "basic purposes" of CEQA is to "[i]nform governmental decision makers and the public about the potential, significant environmental effects of proposed activities"); *Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123 ("Laurel Heights II"). Accordingly, the EIR must reflect a good faith effort at full and accurate disclosure of a project's impacts. CEQA Guidelines

[9] Available at https://www.stocktonca.gov/Documents/Business/Planning%20&%20Engineering/Other%20Projects%20Environmental/Mariposa_Revised_Final_Environmental_Impact_Report_FEIR_-_12622.pdf .

§ 15151. The EIR must clearly explain and support its conclusions; the information should not need to be "painstakingly ferreted out" by the public and decisionmakers. *Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado* (1982) 131 Cal.App.3d 350, 357 (finding an EIR inadequate where the document did not make clear the effect on the physical environment).

The DEIR's discussion of VMT fails to meet this goal. The DEIR repeatedly states that the Project would result in a "decrease in VMT" (DEIR at 4.6-9, 11, 12, 13; 4.8-12, 16) but this assertion is misleading. Any claimed VMT reduction is only on a per capita basis, while the total VMT in the Plan Area will dramatically increase. DEIR Appx. D at 41. The DEIR's misleading VMT conclusion infects other areas of the DEIR. For example, it claims a decrease in VMT to assert that the Project will result in a less than significant impact from VMT-related GHG emissions. DEIR at 4.8-15 to 4.8-16. In doing so, it fails to disclose how the increase in total VMT will lead to increased GHG emissions. Indeed, the DEIR's energy analysis calculates how increased VMT is expected to increase energy use in the Plan Area. DEIR at 4.6-10. There is no reason why the EIR could not perform a similar GHG analysis.

The DEIR's VMT analysis also relies on an improper baseline. An EIR must evaluate a project's environmental impacts using an existing conditions baseline, which typically means the conditions "as they exist at the time the notice of preparation is published." CEQA Guidelines § 15125; *Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 706-07. Although there is some flexibility in selecting the "baseline," the agency must support its selection with substantial evidence. CEQA Guidelines § 15125; *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 328. Here, the DEIR uses an outdated baseline in its VMT analysis. The Notice of Preparation was published in 2021, yet the Fresno ABM model used "has a base year of 2015." DEIR Appx. D at 9. Thus, in determining the significance of the VMT impacts, the DEIR compared the Project's projected VMT to estimates that are now nearly a decade old. DEIR at 4.6-11; 4.8-12 (asserting the Project would result in a "less-than-significant VMT impact" because VMT would be "33 percent lower than 2015 existing conditions"). During these intervening years, per capita VMT may have decreased, meaning the Project's VMT "reductions" are likely smaller than the DEIR claims. Moreover, the DEIR fails to provide substantial evidence showing that its 2015 baseline allows for an accurate reflection of the Project's VMT impact. While the DEIR states that the model was adjusted with 2018 data, that data was still outdated at the time of the NOP. *Id*. By using an unsupported and outdated baseline, the DEIR artificially inflates its VMT reductions and does not allow "the public to . . . intelligently weigh the environmental consequences of [the agency's] contemplated

action." *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 355.

The DEIR's per capita VMT analysis fails to disclose the actual VMT impacts of the Project. As an initial matter, the VMT analysis is opaque, making it difficult to determine how the agency reached the final numerical figures listed. The DEIR states, without further explanation, that "the SCSP project area was overlaid on the Fresno ABM loaded vehicle assignment network and the total VMT for the SCSP project area was calculated by multiplying daily volumes by distance traveled." DEIR Appx. D at 29. From this description, it is impossible to determine how VMT was calculated for trucks and passenger vehicles, and how these assumptions compare to average VMT in the City and County.

Even with this opacity, it appears that the DEIR improperly understates the Project's per capita VMT impact. It calculates per capita VMT under Project conditions using a future projected service population for the Plan area, but excludes roughly half of this population from its calculation of "existing" per capita VMT. DEIR Appx. D at 29, 41. Instead, the "existing" VMT calculation only includes the VMT of current residents and employees in the Plan area. *Id*. at 29. The DEIR does not disclose the existing VMT of the additional 19,093 members of the service population that are expected to use the Plan area in the future. *Id*. at 41. Instead, the DEIR simply assumes these future users of the Plan Area currently have zero VMT, without providing any evidence to support this assumption.

To accurately compare Project conditions to existing conditions, the EIR must compare the VMT of the service population during Project implementation to the current VMT of that same population before the Project. Without any information regarding how the Project will change the existing VMT for the Plan area's future service population, it is impossible to determine whether the DEIR's assertion of a per capita VMT reduction is correct.

D. The DEIR Fails to Sufficiently Analyze Impacts Related to Bicyclist and Pedestrian Safety

Residents of South Central Fresno have long called for the City to encourage the development of more housing and walkable streets in and around their neighborhoods. Instead, industrial development proposed in the SCSP would inevitably bring more truck traffic to the Plan area. This increase in traffic would present substantial safety issues to residents of South Central Fresno—which already lacks consistent and safe infrastructure for pedestrians and cyclists.

The City has a duty under CEQA to consider whether a project would . . . "create[s] risks to pedestrians in and around the project site." *City of Maywood* v. *Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 391. The SCSP DEIR, however, does not adequately analyze the Plan's potential danger to pedestrians, cyclists, or other residents who may be vulnerable to traffic hazards. It neglects to examine the impact of increased truck traffic near sensitive existing uses in or around the Plan Area, such as around Orange Center Elementary School. The DEIR then concludes—without sufficient evidence or analysis—that the SCSP's traffic safety impacts would be less-than-significant.

The residents of South Central Fresno know better. The SCSP continues the City's trend of pushing industrial uses and related truck traffic onto South Central Fresno, a community long-overburdened by pollution. Residents of South Central Fresno already feel unsafe due to heavy truck traffic and poor pedestrian infrastructure, especially in certain areas of the Plan. Continued industrialization only increases threats to residents' safety. By summarily claiming that the SCSP will have a less-than-significant effect on traffic hazards, the DEIR ignores residents' lived experiences.

1. The DEIR Must Examine How Implementation of the SCSP Would Impact Bicyclist, Pedestrian, and Traffic Safety.

The City's DEIR should have described how it anticipated the SCSP to impact bicyclist, pedestrian, and motorist safety. It did not. For an EIR to find that a potential environmental impact is not significant, it must contain an adequate analysis of the magnitude of the impact and the degree to which it is mitigated by mitigation measures. *See*, *Sundstrom*, 202 Cal.App.3d at 306-07. If an agency fails to investigate a potential impact, its finding of significance cannot stand. *Id*. An EIR that incompletely or inaccurately considers how it would impact bicyclist, pedestrian, and traffic safety is legally insufficient. *City of Maywood*, 208 Cal.App.4th at 391.

The DEIR does not meet its legal mandate to provide an intelligent evaluation of potential traffic safety harms. *See*, *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730. Industrial facilities, such as warehouses, are known to bring heavy truck traffic.[10] This traffic presents a known risk of substantial

[10] Bureau of Environmental Justice, Cal. Atty. Gen., Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

safety issues—especially where trucks may pass through residential areas, school zones, or other places that pedestrians frequent and may be most vulnerable.[11] However, the DEIR is vague in its contemplation of traffic safety. Of the four potential impacts it addresses, none directly assess potential harm due to increased truck traffic.

The impact discussions in the DEIR's Transportation and Circulation section only obliquely references traffic safety. Impact 1 examines whether the SCSP conflicts with existing general policies and programs. It concludes that the goals for pedestrian and cyclist safety are consistent between the plans, and thus there is no conflict. DEIR at 4.15-14. However, this purported analysis comes with no attempt of assessing what the SCSP's truck traffic impacts would actually be for the community. It thus fails to conduct a sufficient analysis of traffic safety impacts under *City of Maywood*. 208 Cal.App.4th at 362. Nor do Impacts 2 (VMT), 3 (geometric design features) or 4 (emergency vehicle access) consider how increased truck traffic from increased industrialization may pose safety hazards. This omission is particularly troubling because the City is aware that traffic safety is an "area of controversy" for the Plan. DEIR at 2-4. The DEIR should have included an analysis of this potential impact.

Additionally, the DEIR also should have—but did not—discuss where in the Plan Area increased truck traffic is most likely to create unsafe conditions for pedestrians, cyclists, and others. There is no excuse for this lack of analysis as the City knows the location of existing truck routes in and around the Plan area, and the DEIR and SCSP acknowledge that existing pedestrian facilities are inadequate. *See*, DEIR at 4.15-12 ("[T]here are currently very limited pedestrian facilities in the vicinity of the project site. Sidewalks do exist on portions of East Avenue, North Avenue, Central Avenue, Church Avenue, and Jensen Avenue but are disconnected from one another or are disjointed"); SCSP at 120 ("there is a lack of complete sidewalks, which results in hazards to

(Sept. 2022) at 11, online at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.

[11] In fact, earlier this year, a 10-year-old boy in Fresno County was killed after being struck by truck traffic. Gajarian, *10-year-old boy killed in Sanger crash identified*, Fox 26 News (Mar. 8, 2024), available online at: https://kmph.com/news/local/10-year-old-boy-killed-in-sanger-crash. And last year, a 12-year-old girl was hit by a truck on her walk home from school. Meza, *Girl hit by truck while walking home from school, police say*, Your Central Valley (Aug. 31, 2023), online at: https://www.yourcentralvalley.com/news/local-news/girl-hit-by-truck-while-walking-home-in-fresno-police-say/.

pedestrians, particularly to children around neighborhood schools that there are incomplete bicycle and pedestrian facilities within the Plan Area").

Neither the DEIR nor Plan identify how the Plan's end uses will impact users of the Plan Area's already-precarious bicycle and pedestrian facilities. Rather, the DEIR simply states that "the Plan would substantially increase industrial uses in the Plan Area and implement commercial and minor residential development. Thus, the industrial and other uses would substantially increase traffic, including truck traffic, in the Plan Area." DEIR at 4.15-16.

The mere acknowledgement that the Plan's industrial uses would substantially increase truck traffic is insufficient. The Plan must also disclose the extent of increased truck traffic and identify where there are cyclists, pedestrians, or other sensitive receptors who would be impacted by them. Courts have determined that "recognition of the characteristics of the [plan's] tenants is a necessary prerequisite to accurate identification and analysis of the environmental consequences that will result from approval of the proposed project[]." *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App. 4th 11841213. And in the *City of Maywood*, the court invalidated an EIR for a parallel problem as here—the EIR lacked sufficient detail and analysis to provide a basis on which to assess risks to pedestrians. 208 Cal.App.4th at 387. While the *Maywood* EIR and accompanying safety study expressly contemplated some traffic safety hazards, it crucially failed to evaluate the issue in detail, and "[t]he record [did] not contain any evidence that the [planner] considered or otherwise addressed these issues." *Id.* at 395.

Similarly, here, the SCSP DEIR should have reasonably described the Plan's features and how they would impact pedestrian and traffic safety—particularly for areas where safety considerations were most pressing. That the SCSP DEIR is a program-level DEIR does not excuse it from undergoing such analysis. "[D]esignating an EIR as a program EIR . . . does not by itself decrease the level of analysis otherwise required." *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 426. Instead, "[t]he level of specificity of an EIR is determined by the nature of the project and the 'rule of reason' . . . rather than any semantic label." *Id*. Even if "more precise information may be available during [later] environmental review," an EIR must, at minimum, "provid[e] what information it reasonably can now." *Id*. at 440 (citing CEQA Guidelines § 15144).

If community members had been adequately consulted, the DEIR might have noted the following traffic safety hot spots, where residents feel the most acute danger from truck traffic. For instance, Orange Center Elementary School is located within the

Plan Area, on South Cherry Avenue between East Central Ave and East North Avenue. The school is a block from the CA-41 freeway. Elementary-age students and their guardians walking to and from school are particularly vulnerable to safety issues brought by increased truck traffic. The DEIR only mentions Orange Center Elementary in the context of traffic safety to say that the school would be subject to City programs and "potential safety improvements." DEIR at 3-23. It does not, as required, provide an analysis of the safety risk that the increased SCSP traffic might cause.

In addition, residential communities exist in close proximity to industrial uses throughout the Plan Area. These communities already face danger from truck traffic brought by warehouse development within the past decade. Residents report that trucks pass right in front of their homes, and that the increase in traffic has led them to feel unsafe walking or driving in their neighborhoods. For a number of communities in South Central Fresno, the SCSP zones light and heavy industrial uses and business park uses are located immediately adjacent to known residential areas. The DEIR entirely fails to contemplate how residents of these communities will be impacted by truck and other traffic the SCSP's uses will inevitably bring.

The DEIR's current acknowledgement of potential traffic safety harms is an unreasonably bare assessment of how the SCSP would impact traffic safety in the Plan area. It is thus legally deficient.

2. The DEIR Improperly Relies On Proposed Policies To Conclude That The SCSP's Traffic Safety Impacts Would Be Less Than Significant.

The DEIR's traffic safety analysis also attempts to shortcut CEQA procedures by saying that proposed plan policies will render the vaguely discussed impacts to pedestrians and cyclists "less than significant." However, pointing to these policies does not substitute for an actual analysis of whether Plan impacts may be significant and require mitigation. *See*, *Lotus,* 223 Cal.App.4th 645.

The DEIR barely discusses traffic safety impacts to begin with, but even when it does, it fails to meet CEQA requirements. In a proper analysis, an EIR would examine the significance of an environmental impact, *then*, for each significant impact, discuss proposed mitigation. Pub. Res. Code, § 21100(b). However, the SCSP DEIR circumvents this process by neglecting to reach a conclusion about the significance of traffic safety impacts separately from its discussion of policies intended to mitigate such impacts. DEIR at 4.15-14. This approach is not permissible under CEQA. In *Lotus*, the court held that "avoidance, minimization and/or mitigation measures," are not "part of the project,"

and could thus not be used to justify a finding that an environmental impact was not significant. (2014) 223 Cal.App.4th 645, 655-6 .

Here, the DEIR attempts to engage in the same practice that the court invalidated in *Lotus*. In Impact 4.15-1, the DEIR suggests that "[p]roposed SCSP policies would encourage the construction of bicycle and pedestrian safety improvements and transportation demand management strategies for employees to support the use of alternative modes of transportation." DEIR at 4.15-14. However, merely gesturing towards proposed policies as de facto mitigation is not an analysis of traffic safety impacts. "By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA." *Lotus*, 223 Cal.App.4th at 656.

Furthermore, SCSP policies that the DEIR claims will automatically mitigate possible impacts are too vague to suffice as mitigation. And the formulation of mitigation measures cannot be developed after project approval unless the agency "commits" itself to "specific performance standards." *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 122.

For instance, Policy MT-5-d merely states: "Pedestrian Safety. Minimize vehicular and pedestrian conflicts on both major and non-roadways through implementation of traffic access design and control standards addressing street intersections, median island openings and access driveways to facilitate accessibility while reducing congestion and increasing safety." And Policy MT-6-c says: "Link Paths and Trails and Recreational Facilities. Strive to provide path or trail connections to recreational facilities, including parks and community centers where appropriate, and give priority to pathway improvements within neighborhoods characterized by lower vehicle ownership rates and lower per capita rates of parks and public open space." None of these policies commit the City to specific mitigation or performance standards. They are thus inadequate substitutes for real mitigation plans. *League to Save Lake Tahoe*, 75 Cal.App.5th at 122.

3. The DEIR Fails To Adequately Analyze the Cumulative Affects Related to Bicyclist and Pedestrian Safety.

The DEIR also erroneously relies on the Truck Reroute Study,[12] discussed in prior sections, to justify its claim that traffic safety impacts will be less than significant. The DEIR states: "The [Truck Reroute Study] is designed to address, among other things,

[12] City of Fresno, South Central Fresno AB617 Community Truck Reroute Study and related Health Assessment (Apr. 2024), online at https://www.fresno.gov/publicworks/south-central-truck-re-route-study/.

truck transportation conflicts, accidents, and residential and school impacts . . . it is anticipated that its recommendations will be implemented by the City and would further reduce the potential for such hazards." SCSP DEIR at 4.15-16. However, the DEIR cannot summarily assume that the study will mitigate potential truck traffic impacts the SCSP's proposed industrialization would bring. In fact, the DEIR must conduct an analysis of the SCSP and Truck Reroute Study's cumulative safety risks, as both plans will affect traffic safety in South Central Fresno. Failure to consider these closely related plans in tandem renders the SCSP's cumulative impact analysis deficient. *See*, *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1213-14.

Contrary to the DEIR's assumptions, residents have cause for concern that the Truck Reroute Study will *increase*, rather than reduce, truck safety hazards in the Plan area and near sensitive receptors. A closer read of the Study shows that, while it plans to diverts truck traffic from some areas of Fresno, it will push heavy duty trucks *into* the SCSP Plan area. For instance, the Truck Reroute Study includes truck routes on Cedar Avenue between American and Central Avenues, and on North Avenue between Maple and Peach Avenues near existing residents. The Truck Reroute Study also designates "Truck Regulated Areas" ("TRAs") where truck traffic is to be limited—but the map of proposed TRAs leaves a massive gap where much of the SCSP is located. Key sensitive receptors within the SCSP Plan Area are not even covered; Orange Center Elementary School is not currently in a TRA. Therefore, the Truck Reroute Study is likely to cause more safety risks—bringing more dangerous truck traffic into places where people in South Central Fresno live and go to school. By failing to conduct an analysis of truck traffic impacts from the Study and SCSP, the DEIR fails its CEQA mandate to consider cumulative impacts.

Because the DEIR failed to adequately examine SCSP's impact on traffic safety, it cannot reasonably conclude that traffic safety impacts would be less than significant. It likewise cannot say that mitigation for its insufficiently analyzed Plan is unnecessary. The DEIR's determination that traffic safety impacts will be less than significant and require no mitigation is thus legally invalid.

E. The DEIR's Analysis of Hydrology and Water Quality is Inadequate.

The DEIR's description of the environmental setting for hydrology and water quality is inadequate. The DEIR discloses that groundwater quality is a concern in the Plan Area due to several major contaminant plumes. DEIR at 4.10-12 and 4.10-21. The DEIR indicates that the plumes contain organic and inorganic compounds, solvents,

pesticides and other contaminants. *Id.* "Known contaminants include dibromo-3-chloropropane (DBCP), ethylene dibromide (EDB), trichloropropane (TCP), volatile organic compounds (VOCs) such as trichloroethylene (TCE) and tetrachloroethylene (PCE), nitrate, manganese, radon, chloride, and iron." *Id.* Despite these concerns, the DEIR analysis of the Project's impact on groundwater supply and quality is cursory and incomplete.

The DEIR states that most contaminants in groundwater are being addressed, yet it fails to indicate existing pollutant levels to disclose the extent and severity of the pollution. This information is key to understanding the existing condition of water quality in the area. The DEIR also fails to disclose information about the number and locations of domestic wells in the Plan Area. Many residents on portions of East Central, Malaga, and Britten Avenues, among other residential areas, rely on groundwater via domestic wells. Therefore, information on groundwater quality at these well sites as well as the status of groundwater generally are important data points to establish a baseline for water quality in the area from which to measure potential impacts.

Likewise, the DEIR analysis fails to analyze the potential for the vast increase in industrial and business park uses to result in further contamination of groundwater. Instead the DEIR, relies solely on future project compliance with existing regulations to conclude that any related impacts would be less-than-significant. DEIR at 4.10-19. However, the fact that development may comply with existing regulations does not mean that its impacts will be less than significant. *See*, *Kings County Farm Bureau,* 221 Cal.App.3d 692.

Despite concerns about the existing quality of groundwater in the area, the DEIR analysis of the Project's impact on groundwater supply and quality is cursory and incomplete so that the document's conclusions that impacts to groundwater supplies and recharge would be less than significant are unsupported.

F. The DEIR Fails to Adequately Analyze and Mitigate for the SCSP's Noise Impacts

In evaluating the effects of noise on sensitive receptors, the DEIR states that "the plan is designed to buffer residentially designated areas with less intensive land uses (e.g., Business Park) such that new industrial uses would not be located within distances that could expose existing sensitive receptors to excessive stationary noise levels." DEIR at 2-48. As an initial matter, this assertion is misleading because the Business Park designation still permits warehouses and other uses that could still generate substantial noise. In any event, the DEIR concedes that "it is possible that new stationary noise

sources could result in excessive noise at sensitive receptors and exceed applicable City of Fresno standards." *Id*. Therefore, any reasonable person can see that, because the plan would result in excessive noise in exceedance of standards, the plan cannot be said to buffer residents from the harmful effects of noise.

While in this instance the DEIR accurately concludes that related impacts would be significant, it fails to identify measures to minimize these impacts. The DEIR only proposes requiring development applicants to prepare an acoustical analysis to identify project-specific noise effects and noise abatement measures, thus deferring analysis and mitigation. Moreover, this measure only perpetuates the City's approach over the last decade, which has resulted in allowing development that has added significant stationary and mobile noise sources (e.g., large truck fleets) immediately adjacent to residential areas. For example, recently approved Amazon facilities are located approximately 500 feet from a residential neighborhood along Central Avenue. Hundreds of heavy duty trucks travel through the intersection at Central and Orange daily and enter the facility nearby on Orange Avenue, and area residents experience noise disturbance from truck traffic 24 hours a day, seven days a week. Instead, the DEIR should have included a measure that expressly prohibits new development that results in noise exceeding the City's standards.

A revised DEIR should include additional mitigation to ensure that new development will not result in excessive noise to sensitive receptors.

G. The DEIR Fails to Provide an Adequate Analysis of the Project's Potentially Significant Cumulative Impacts..

CEQA requires lead agencies to disclose and analyze a project's "cumulative impacts," defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Guidelines § 15355. Cumulative impacts may result from a number of separate projects, and occur when "results from the incremental impact of the project [are] added to other closely related past, present, and reasonably foreseeable probable future projects," even if each project contributes only "individually minor" environmental effects. Guidelines §§ 15355(a)-(b). A lead agency must prepare an EIR if a project's possible impacts, though "individually limited," prove "cumulatively considerable." CEQA § 21083(b); Guidelines § 15064(i). A proper cumulative impact analysis is "absolutely critical," *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1217, as it is a mechanism for controlling "the piecemeal approval of several

projects that, taken together, could overwhelm the natural environment," *Las Virgenes Homeowners Fed'n, Inc. v. County of Los Angeles* (1986) 177 Cal.App.3d 300, 306.

As discussed above, the DEIR repeatedly fails to analyze the Project's cumulative impacts. Additionally, the DEIR's cumulative analysis fails to include the Caltrans South Fresno State Route 99 ("SR 99") Corridor Project, which will implement operational changes at the North Avenue interchange and American Avenue interchange. The North Avenue interchange is located in the center of the SCSP area and the American Avenue interchange is approximately one mile to the southeast of the SCSP area. See, https://dot.ca.gov/-/media/dot-media/district-6/documents/d6-environmental-docs/06-0h240/sr99-sth-fre-sr99-crrdr-f-060h240-0223-a11y.pdf The EIR for the SR 99 Corridor Project was finalized in January 2023, well in advance of release of this project DEIR.

The DEIR's omission of this project is a serious flaw because the interchange reconfiguration project will add significant traffic capacity to the interchanges. *See*, comments submitted by Friends of Calwa, Inc. and Fresno Building Healthy Communities dated July 14, 2024, attached as Exh. K. The SR 99 Corridor Project will expand capacity by construct new additional bridge overcrossings, ramps, and additional structures to facilitate increased traffic flow and will expand SR 99 from six to eight lanes. Id. at 1.This project will more than double capacity for heavy duty trucks and cars to travel between an expanding SR 99 and local South Fresno roadways and add thousands of daily truck trips to the area. Id. at 2. Yet, the EIR fails to evaluate how increased heavy duty truck and automobile traffic entering the SCSP area from these interchanges will combine with the Project's environmental impacts and contribute to already significant impacts related to air quality, public health, climate change, public safety, and noise.

In addition, the DEIR fails to adequately address the cumulative noise impacts of anticipated development in the SCSP area. The DEIR concedes that the Project's construction and operational noise impacts would both be significant and unmitigable to levels less than significant. DEIR at 4.12-13 to 4.12-18. The DEIR also concedes that cumulative construction and operational noise impacts would be cumulatively considerable. DEIR at 5-13 to 5-14. However, because it does not include noise impacts from increased heavy duty truck traffic due to the SR 99 Corridor Project, the DEIR fails to disclose the extent and severity of cumulative impacts, both in the short- and long-term. Most egregiously, the DEIR concludes that "no additional mitigation is available beyond what is identified" in the document. *Id*. This conclusion is incorrect. The City can propose additional SCSP policies to address these impacts, such as: requiring *real* protective buffers to prohibit any new industrial and business park uses from locating near residential areas; prohibiting uses from exceeding external noise standards near

residential areas, and establishing a prohibition on truck traffic travelling through residential areas. The DEIR simply fails to propose such common sense mitigation that could help relieve the noise burden on residents in the Plan area.

Because DEIR fails to provide any meaningful analysis of or mitigation for these potentially significant impacts, the DEIR must be recirculated.

H. The DEIR Fails to Adequately Analyze Alternatives to the Proposed Specific Plan

Under CEQA, a proper analysis of alternatives is essential to comply with the Act's mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Res. Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 443-45. As the California Supreme Court has stated, "[w]ithout meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process . . . . [Courts will not] countenance a result that would require blind trust by the public, especially in light of CEQA's fundamental goal that the public be fully informed as to the consequences of action by their public officials." *Laurel Heights Improvement Ass'n,* 47 Cal.3d at 404.

Critically, an EIR must consider a "reasonable range" of alternatives "that will foster informed decision-making and public participation." CEQA Guidelines § 15126.6(a); *Laurel Heights Improvement Assn,* 47 Cal.3d at 404 ("An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making."). The discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines § 15126.6(b). The DEIR fails to meet CEQA's mandates for an adequate alternatives analysis.

1. The DEIR's Failure to Adequately Describe the Existing Setting and Analyze Project Impacts Undermines the Alternatives Analysis.

As a preliminary matter, as described throughout this letter, the DEIR's failure to describe the existing setting and to disclose the extent and severity of the Project's broad-ranging impacts necessarily distorts the document's analysis of Project alternatives. As a result, the alternatives are evaluated against an inaccurate representation of the Project's impacts. Proper identification and analysis of alternatives is impossible until Project

impacts are fully disclosed. To take one example, once the DEIR reveals the full extent of the air pollutant emissions and related public health impacts in the planning area, the City should consider additional alternatives and/or reduced industrial uses, that would help lessen such impacts.

2. The DEIR's Dismissal of the Community Plan Option Alternative Is Unsupported.

The DEIR presents two additional "options" to the alternatives: the Community Plan Option and the Business Plan Option. Of these two options the Business Plan is a straw man alternative because a) it fails to reduce *any* of the SCSP's significant impacts and (*see*, CEQA Guidelines § 15126.6(b)) and b) fails to meet several of the City's stated objectives (e.g. minimize environmental and neighborhood impacts and protect against incompatible uses). By contrast, the Community Plan Alternative, proposed by the community, reduces impacts in several topic areas, and as discussed below, would reduce impacts even further if the amount of non-residential development was reduced while keeping the number of jobs the same as provided by the proposed project. Lastly, the DEIR provides no explanation or analysis as to why the Community Plan alternative is relegated to the apparent lesser status of an "option" rather than being considered as an "alternative" to the project.

As discussed above, inexplicably, the Community Plan Alternative is assumed to have the same amount of non-residential development as the SCSP. DEIR at 6-26. The two alternatives to the project (the Farmland Conservation Alternative and the Reduced Plan Area Alternative (i.e., no lands in the SOI) have a significantly reduced amount of non-residential development due to a reduction in the geographic area considered for development. *See,* Table 1 below. Given that the Community Plan was proposed by area residents, largely due to their concerns about air quality impacts, and public health and safety of residents overall, it would make sense that the Community Plan alternative would also include a reduced amount of non-residential development. The Community Plan is shown to result in a greater number of jobs than the proposed SCSP (11,644 additional jobs, or 25,955, compared to the proposed project, 14, 311). DEIR at 6-29. Therefore, it appears to be feasible to consider the Community Plan with a reduced amount of non-residential development that would still yield the same number of jobs as the proposed SCSP. Such an alternative would not only meet the City's objectives, it would also result in reduced impacts in key issue areas for the community, such as reduced criteria pollution emissions, a reduced number of residents being exposed to polluting emissions, reduced health risks, and reduced exposure to safety risks and noise

sources due to reduced truck traffic associated with industrial and regional business park uses.

Table 1: Comparison of proposed alternatives.

	Existing	Prop Plan	No Project/ GP Alt	Farmland Conserv	Reduced Plan Area	Community Plan Option	Business Plan Option
Residential units/persons		**91 / 313**	**0**		**53**	**739 / 2,262**	**0**
Jobs		**14,311**	**13,702**	**11,709**	**8,300**	**25,955**	**13,657**
Non-Residetial		**12,021,744**		**9,857,830**	**6,972,612**	**12,021,744**	**12, 021,744**
Aesthetics			**Sim**	**<**	**<**	**Sim**	**Sim**
Agriculture		**992**	**Sim**	**<Avoids**	**<**	**Sim**	**Sim**
Air Quality			**>**	**<**	**<**	**<**	**>**
Biology			**Sim**	**<**	**<**	**Sim**	**Sim**
Cultural			**Sim**	**Sim**	**Sim**	**Sim**	**Sim**
Energy			**Sim**	**<**	**<**	**Sim**	**Sim**
Geology			**Sim**	**<**	**<**	**Sim**	**Sim**
GHG			**>**	**<**	**<**	**<**	**>**
Hazards			**Sim**	**<**	**<**	**Sim**	**Sim**
Hydrology			**Sim**	**<**	**<**	**Sim**	**Sim**
Land Use			**Sim**	**Sim**	**Sim**	**Sim**	**Sim**
Noise			**Sim**	**<**	**<**	**Sim (< trucks)**	**Sim**
Pop/ House			**Sim**	**Sim**	**Sim (<)**	**>**	**<**
Pub Serv/Rec			**Sim**	**<**	**<**	**Sim**	**Sim**
Transportation			**>**	**Sim**	**Sim**	**Sim**	**>**
Utilities			**>**	**<**	**<**	**>**	**>**

III. The DEIR Must Be Revised and Recirculated.

Under California law, the present DEIR cannot properly form the basis of a final EIR. CEQA and the CEQA Guidelines describe the circumstances that require recirculation of a DEIR. Such circumstances include: (1) the addition of significant new information to the EIR after public notice is given of the availability of the DEIR but before certification, or (2) the DEIR is so "fundamentally and basically inadequate and

conclusory in nature that meaningful public review and comment were precluded." CEQA Guidelines § 15088.5.

Here, as this letter explains, the DEIR fails to adequately reveal or describe the true extent of numerous of the Project's significant environmental impacts, which 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. Once the DEIR reveals the full extent of the Specific Plan's impacts, the City should consider land use designation changes that prohibit high-pollutant emitters in the buffer around residential areas to lessen such health hazards.

IV. Conclusion

As described above, the DEIR violates CEQA in numerous respects. Unfortunately, the impact of the CEQA violations will be felt most acutely by the City's most vulnerable residents; low-income residents and communities of color. If not remedied, this disproportionate impact on area residents, will result in violations of state law. Through the environmental review process, the City has an opportunity to develop a Specific Plan that minimizes the Project's significant impacts and complies with CEQA, while at the same time ensuring that the most disadvantaged neighborhoods in South Central Fresno do not bear the burdens of the City's growth.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Edward T. Schexnayder
Carmen Borg, AICP, Urban Planner

Cc: Robert Swanson, Deputy Attorney General, Bureau of Environmental Justice, California Attorney General's Office, robert.swanson@doj.ca.gov

Brian Moore, Air Resources Supervisor, CARB, Brian.Moore@arb.ca.gov

Ryan Hayashi, Deputy Air Pollution Control Officer, SJVAPCD, Ryan.Hayashi@valleyair.org

Councilmember Miguel Arias, District3@fresno.gov

Exhibits:

Exhibit A:	Baseline Environmental, Inc. Report
Exhibit B:	"Health effects of volatile organic compounds," Medical News Today
Exhibit C:	CARB's Low Emission Diesel Study Final Report
Exhibit D:	California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective
Exhibit E:	Nature Communications, Kerr et. al. "Air pollution impacts from warehousing in the United States uncovered with satellite data", July 24, 2024
Exhibit F:	OEHHA February 2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments
Exhibit G:	UC Merced Fresno Community Environmental Health Impact Assessment
Exhibit H:	Executive Order B-30-15
Exhibit I:	Assembly Bill 1279
Exhibit J:	*Atmosphere* 2023, 14(5), 857; https://doi.org/10.3390/atmos14050857, Yan et al, Cooling Effect of Trees with Different Attributes and Layouts on the Surface Heat Island of Urban Street Canyons in Summer
Exhibit K:	Comments submitted by Friends of Calwa, Inc. and Fresno Building Healthy Communities dated July 14, 2024

Penny Newman Grain Co.

To:
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Date:
7/29/24

From:
Penny Newman Grain Co.
2691 S. Cedar Ave, Fresno, CA
David Meeker
Phone: 559-448-8800
dmeeker@penny-newman.com

Subject:
South Central Specific Plan (SCSP), Environmental Impact Report (EIR)-Concerns

Dear Sophia,

Penny Newman Grain Co. has been operating our facility within the SCSP area since 2001. I would like to express concerns with the SCSP and the unintended negative impacts of the EIR as currently drafted.

Our company has been continuously in operation within the Fresno area since 1878. The Fresno facility receives feed products for livestock by rail and truck. These products are stored and shipped by truck out to our customers. When searching for a location to operate our company was pleased to find an under utilized facility with rail service and near a major highway. An added benefit of having our business in Fresno is the number of employees we have residing within the City, and allowing for a short commute to work.

The SCSP poses substantial impacts for our company not only for our land use, but to our daily operations as well.

- The rezoning map reduces our currently zoned Heavy Industrial property to Light Industrial on the north and west sides. Not only does this reduce the value of the property by limiting the use, it also creates a reduction of possible operational activity and restricted permitting of facility improvements.
- The proposal of this reduction in zoning is additionally concerning as it targets “Animal Food Manufacturing” as not allowed in Light Industrial.
- Down zoning of business properties discourages businesses from wanting to invest in Fresno due to the risk of the rules being changed and negatively effecting the investment and commitment made within the City. The driving away of businesses, in turn results in a loss of employment for the residents of the City.
- Our facility has been in the Heavy Industrial category for many years with residential property across the street since the 1950’s.

Environmental Mitigation Goals.

- The SCSP introduces the concept of “buffers,” which restricts or eliminates certain types of developments within the SCSP that are within 1,000 feet of “sensitive uses.” According to the City’s

maps, these buffers cover nearly half of the entire SCSP area. The City should not consider but decline to incorporate buffers into the SCSP.

- We are also unaware of any city or county near Fresno that has adopted 1,000-foot buffers. Because there is significant demand for industrial development in the City, and few places in the City to build, the adoption of buffers would simply mean that new industrial developments and the jobs they create will go to other nearby municipalities. As a longtime Fresno business, we cannot support any policy that would undermine the success of Fresno as an industrial hub or that would incentivize our workforce to move elsewhere.

Improvements/Mitigation Infeasibility

- The SCSP also seeks to require landowners seeking permits from the City to adopt expensive, unproven, and wasteful mitigation. If applicable, these requirements would apply for new construction. They would likely also apply to future permits and approvals received from the City, potentially requiring the upgrade of the entire facility to the standards below.
- The following are some examples of the more onerous permitting conditions that will add significant cost to new development/improvements requiring discretionary approvals.

1. Solar Infrastructure:

- Buildings over 400,000 square feet must "ensure rooftop solar panels are installed and operated in such a manner that they will supply 100% of the power needed to operate [the non-refrigerated] portions of the facility including the parking areas." (SCSP at 75.)
- All other buildings shall have solar-ready roofs, "which includes designing and constructing buildings in a manner that facilitates and optimizes the installation of a rooftop solar photovoltaic (PV) system at some point after the building has been constructed." (SCSP at 75.)
- All other buildings must "demonstrate their capacity to include energy production and storage features on-site, including" on-site solar panels. The amount of renewable energy needed is based on the needs of the development, serving at a minimum 50% of the energy demand. (SCSP EIR, Mitigation Measure 4.6-1d.)

2. Required Transition to Zero Emissions Trucks:

- All future tenants of new and redeveloped commercial and industrial land uses must ensure all Class 7 and 8 trucks are "model year 2014 or later." After December 31, 2026, all trucks must be transitioned to "zero-emission vehicles," subject to the Planning Director's discretion. (SCSP EIR, Mitigation Measure 4.2-1h.) The developer or the business is also responsible for ensuring "that adequate electrical infrastructure is provided to allow for the transition to electric heavy-duty trucks." (Id.)
- This is far more aggressive than CARB's Advanced Clean Fleets ("ACF") regulation, which allows high-priority fleets to purchase at least some trucks other ZEVs until 2035.
- Moreover, unlike the ACF regulation, which only applies to some fleets, the City's Mitigation Measure applies to all discretionary permits for commercial and industrial land uses within the SCSP.
- The City requires an equally aggressive phase-in schedule (more aggressive than CARB's ACF regulation) for Class 2-6 Trucks, requiring full electrification of the fleet by December 31, 2031. (SCSP EIR, Mitigation Measure 4.3-1i.)
- The reality of this proposal is you are asking businesses to purchase new technology that currently cannot operate more than 150 loaded miles. These trucks cost more than twice the amount of a CARB compliant diesel truck and have an operational range of less than half of a diesel truck. If implemented, a business would need to own twice the number of trucks to complete the same amount of work. The truck traffic would double within the city.

3. Promotion of Passenger EVs for Customers/Employees:

- "At least 10% of all passenger vehicle parking spaces shall be electric vehicle (EV) ready," and at "least 5% of all passenger vehicle parking shall be equipped with working Level 2 Quick charge EV charging

stations installed and operational, prior to building occupancy," regardless of employee or customer demand for such spaces. (SCSP at 75.)

4. Zero Emissions Equipment:

- "On-site motorized operational equipment shall be ZE (zero emission)." (SCSP at 75.)
- Due to the limitations of cycle times and charging durations this is not feasible for our industry. When and where the operational capacity electric equipment improves and becomes competitively priced it will be entertained as an option. The "free market" should be the determining factor, not by force or rule.

5. Construction Fleets/Equipment/Materials:

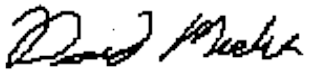
- All "construction contractors shall demonstrate that they shall use the cleanest available fleet of heavy-duty equipment" after submitting "Construction Clean Fleet" paperwork to the San Joaquin Valley Air Pollution Control District. And "on-site yard trucks and forklift shall be powered by electricity." (SCSP EIR, Mitigation Measure 4.3-1B.)
- The SCSP requires an applicant to "deploy the highest rated CARB Tier Technology that is available at the time of construction," subject to discretionary waivers by the Planning Director. (SCSP at 76.)
- The required use of "electric-powered hand tools, forklifts, and pressure washers." (SCSP at 76.)
- Prohibition of diesel-powered generators for construction. (SCSP at 76.)
- Required to use at least 20% locally sources or recycled materials for construction materials, and wood products used should be certified through a sustained forestry program. (SCSP EIR, Mitigation Measure 4.8-1b.)
- The above items are being forced into the market and may not be suitable for all applications. Although these should be offered as options, the "free market" should be the determining factor, not by force or rule.

6. Other Infrastructure Improvements:

- Unless a property owner records a covenant stating the property prohibiting refrigerated warehouse space, "a conduit shall be installed during construction of the building shell from the electrical room to 100% of the loading dock doors that have the potential to serve refrigerated space." In addition, all dock doors serving TRU units must include "electric plug-in units." (SCSP at 75.)
- The construction of a secondary electrical room (or sizing one electrical room 25% larger than required) to accommodate additional electrical panels. (SCSP at 76.)
- For all industrial land uses that do not use natural gas as part of a manufacturing process, "no natural gas infrastructure shall be permitted." (SCSP EIR, Mitigation Measure 4.3-1k.)
- This requirement increases development cost or limits the properties potential, if a building changes use it can be retrofitted with additional utilities once needed.

Please consider the unintended consequences of what is being proposed within the proposed changes. There is a considerable financial burden being forced upon businesses that will cause negative effects to the City, businesses, and the residents. We are the second oldest business in Fresno, and proud to have been a part of the City of Fresno for 146 years, our hope is the City will consider our position as a long-standing partner.

Sincerely,



David Meeker
Penny Newman Grain Co.

July 3, 2024

Sophia Pagoulatos
City of Fresno
2600 Fresno St
Fresno, CA 93721

Ref: Gas and Electric Transmission and Distribution

Dear Sophia Pagoulatos,

Thank you for submitting the South Central Specific plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line ‘kicker blocks’, storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E’s ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4’) in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

July 30, 2024

City of Fresno Planning and Development Department
2600 Fresno Street, Room 3065 Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Email: scsp@fresno.gov

Subject: Comments on DRAFT South Central Specific Plan and EIR

Dear Sophia,

Thank you for the opportunity to submit a comment letter related to the Draft South Central Specific Plan and EIR.

We applaud the City of Fresno for diligently attempting to thread the needle between the urgent need for moving industrial development forward with high paying job creation in south Fresno, and the critical need for dramatically improved environmental quality and protection of proximate communities and existing and future residents from any harmful activities or impacts in south Fresno.

However, there are some deficiency issues with data used for demand projections in the Market Study supporting plan and EIR conclusions and some contextual frameworks related to Fresno County's clean energy transition and opportunities for long-term mitigation that we believe should be considered. See the three points on these topics below:

1. **Projected population and employment growth in DRAFT South Central Specific Plan and EIR are overstated based on 2023 State Population Revisions – Such that another look at related data and analyses is required**

The population demand assumptions for the plan/EIR and its proposed mix of land uses have not been updated with July 2023 State of California Department of Finance P-2: County Population Projections 2020-2060 (https://dof.ca.gov/forecasting/demographics/projections) which are a fraction of those

stated in the plan and its supporting Market Study, suggesting a deficiency in the draft EIR analyses as well. See notes about population projections below.

Notes on population projections: The projections and related statements in EPS Market Study - about population and jobs - appear significantly inflated given State DOF population projections for whole County released last July, 2023 that suggest the addition of 64,000 in total population growth 2024-2040 for whole county that adjusted for the approximately 56% share City of Fresno has historically represented of county population equals about a 36,000 population addition for City area - versus the 176,000 to 216,000 population addition by 2040 that study notes below and uses for its projections.

Page 4 of attached Market Study for DRAFT South Central Specific Plan and EIR:

The City is projected to add up to 216,000 residents and nearly 70,000 employees by 2040. Total population change, which encompasses a combination of births, deaths, and net migration in the City, is estimated to range from an addition of 176,000 to 216,000 new residents between 2022 and 2040.5 This level of growth translates into about 9,800 to nearly 12,000 residents added per year, on average. For comparison, in the period between 2002 and 2019, the City added approximately 106,000 new residents for an average annual growth of about 5,900 residents. That is, population growth between 2022 and 2040 is projected to be 1.5 to 2.0 times the City's long-term average annual population growth, suggesting that there will be significant increases in in-migration to achieve this level of growth. While recent trends suggest intrastate migration from coastal California to inland counties could lead to increased rates of in-migration, various economic factors including recessionary conditions, interest rates, supply chain challenges, and labor shortages may result in a lower level of in-migration.

Projected employment growth in the City is estimated to range between 50,100 and 69,700 new jobs through 2040, translating into an average of about 2,800 to 3,900 new jobs added annually. These employment projections appear to be reasonable estimates, bracketing historical, long-term employment gains, where the City added an average of about 3,400 new jobs annually between 2002 and 2019.

2. **Notwithstanding questions about efficacy of population projections used for demand analyses – Situating the DRAFT South Central Specific Plan and EIR fully within the context of massive prospective clean energy opportunities in Fresno County can expand demand for even more eco-industrial and circular manufacturing**

The larger context of rapidly emerging significant clean energy production potential in Fresno County represented by the Valley Clean Infrastructure Plan (https://valleycleaninfrastructureplan.com/) proposed for the Westlands Water District area, and the prospective addition of clean energy access and innovation, new sources of

clean industrial development demand, mitigation of some anticipated industrial development and transportation impacts, and the unique possibility for cross-sector agreements on allowable transitional period impacts through incremental impact reduction milestones while getting to 100% clean energy industry deployment and transport systems, are not considered or referenced in the DRAFT South Central Specific Plan and EIR.

Ultimately, we believe, the coexistence of important integrated industry, jobs and environmental goals can only feasibly be achieved at scale by focused implementation of new and exemplary renewable energy powered eco-industrial/circular manufacturing industrial parks with concomitant clean transportation systems. See the **San Joaquin Sierra Jobs Draft Investment Plan – Circular Manufacturing Chapter** (https://www.s2j2initiative.org/news-resources). Also see: **'GROWING CLEAN AND EFFICIENT MANUFACTURING' by** Reimagining Appalachia (https://reimagineappalachia.org/wp-content/uploads/2020/10/ReImagine-Appalachia_Manufacturing_10-28-2020-1.pdf), and **'Driving clean industrial innovation across the U.S.'** by the Clean Air Task Force (https://www.catf.us/2024/06/driving-clean-industrial-innovation-across-us/).

These desirable outcomes noted above would need to be facilitated not only by enlightened land use policies, but through the advent of superordinate local government based clean energy acquisition and generation oriented JPAs and related industry and community partnerships that form and work closely together for these purposes. See attached **Gigawatts for Good Jobs** slide deck (and paper) presented to Fresno COG Policy Board 7-25-24. Also see article '**Inside Look at Fresno County Westside Solar Plan to Power 9 Million Homes'** attached. Land use plans such as the South Central Specific Plan, contextualized and informed by new exemplary renewable energy powered circular manufacturing/eco-industrial park concepts, may have some additional and different policy prescriptions and create new intergovernmental and cross-sector partnerships.

3. **We believe it would be appropriate to reconsider and recalibrate the DRAFT South Central Specific Plan proposals and EIR analyses with more current state population projections, and to also bring the plan fully into the broader context of the clean energy transition and opportunities uniquely emerging in Fresno County with the potential for broad-based local government, industry and community partnerships that were previously inconceivable.**

Regards,

KR Bergthold

Keith Bergthold, CEO and Board Chair, Regenerate California Innovation, Inc.

NOTICE OF TIME EXTENTION OF THE PUBLIC COMMENT PERIOD FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SOUTH CENTRAL SPECIFIC PLAN (SCH#2019079022)

On May 31, 2024, a Notice of Availability was given that the City of Fresno (City), as the Lead Agency, had completed a Draft Environmental Impact Report (EIR) for the South Central Specific Plan. The Draft EIR was distributed to public agencies and interested parties for public review pursuant to the California Environmental Quality Act (CEQA, Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) starting a 45-day public comment period set to conclude on July 15, 2024.

This notice is to announce that the public comment period has been extended by 15 days to July 30, 2024 to allow public agencies and interested parties a total of 60 days to review and comment on the Draft EIR. In re-noticing the Draft EIR, the City continues to provide online links to the documents as well as information on additional viewing methods.

PROJECT LOCATION

The Plan Area encompasses 5,567 acres located just south and southeast of Downtown Fresno. The Plan Area is generally located south of California Avenue, north of American Avenue, and between Fig and Peach Avenues. The area has a range of property types including industrial, warehouse, commercial, residential, religious, educational, and public.

PROJECT DESCRIPTION

The Plan Area currently supports nearly 19.6 million square feet of nonresidential development and approximately 400 residential units. The plan assumes that an additional 12 million square feet of nonresidential uses and 91 dwelling units would be constructed by 2040. Growth in the Plan Area would be primarily industrial, with smaller amounts of office and retail uses. Other land uses would be permitted in accordance with General Plan land use designations, but are not the focus of the SCSP.

A primary impetus for the SCSP is economic development and job growth. As discussed in the Draft EIR, more than 14,000 new jobs would be created by 2040 with anticipated development, primarily in the industrial sector, with lesser but still substantial growth in office and retail jobs.

Assumed Development for the Proposed Plan Compared to Existing Conditions

Land Use Designation	Existing (square footage)	Proposed Plan (square footage) by 2040
Retail	0	866,676
Office	10,912	578,790
Industrial	19,624,154	10,576,278
Total Non-residential	19,635,066[1]	12,021,744
Residential Units	400 dwelling units	91 dwelling units

Notes: [1] Existing development only reflects the employment land use categories within the Specific Plan Area. Source: Ascent 2023.

The SCSP proposes land use designation changes for certain areas, requiring a General Plan amendment and rezone of the same properties. The changes are proposed primarily to 1) reconcile land use designations with existing conditions, 2) to buffer sensitive uses (e.g., residential areas, Orange Center School) with less intensive uses (e.g., business park instead of industrial), and 3) to provide more opportunities for neighborhood-serving general commercial uses near residential areas. The SCSP would result in substantial reductions in acreage of Heavy Industrial land uses and a modest decrease in Regional Business Park, with corresponding increases in acreage of Business Park, Single-Family Residential, Public, Light Industrial, and General Commercial uses.

DOCUMENT AVAILABILITY

Addresses where a copy of the Draft EIR is available for review:

City of Fresno
Planning and Development Department
2600 Fresno Street, Third Floor, Rm 3043
Fresno, CA 93721

Fresno County Public Library
2420 Mariposa Street
Fresno, CA 93721

Mosqueda Branch Library
4670 E Butler Ave
Fresno, CA 93702

West Fresno Branch Library
188 E California
Fresno, CA 93706

The Draft EIR is also available on the City's website at:
https://www.fresno.gov/planning/plans-projects-under-review/#south-central-specific-plan-scsp

PUBLIC COMMENT PERIOD

The City of Fresno will receive public comments on the Draft EIR from **May 31, 2024** to **July 30, 2024**. Written comments should be received **no later than 5pm (PST) on July 30, 2024**. Please send your written comments to Sophia Pagoulatos and include your name, address, and phone number and/or email address so that we may contact you for clarification, if necessary. Comments may be delivered in person, by first class mail or email to:

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

PROBABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

The Draft EIR analyzes potential significant effects of the proposed plan related to:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Employment, and Housing
- Public Services and Recreation
- Transportation and Circulation
- Utilities and Service Systems
- Cumulative Effects

Mitigation measures identified in the Draft EIR would not reduce potentially significant effects related to the following areas to less-than-significant levels: aesthetics, agriculture and forestry resources, air quality, cultural and tribal cultural resources, greenhouse gas emission and climate change, and noise. There are properties within the Plan Area that are known to have contaminated groundwater, aquifers, and soils that require cleanup consistent with 65962.5. Six of the sites are considered active and others are in the process of assessment, remediation or have been closed.

Public hearings will be held, subsequent to the public review period, at a time and place to be specified by legal advertisement. If you would like to be notified of the hearings or would like additional information please contact:

Sophia Pagoulatos, Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Email: scsp@fresno.gov
Telephone: Sophia Pagoulatos (559) 621-8062 or
Adrienne Asadoorian-Gilbert (559) 621-8339

AVISO DE EXTENSIÓN DE TIEMPO:
PARA EL PERIODO DE COMENTARIO PÚBLICO
PARA EL REPORTE DE IMPACTO AMBIENTAL PARA EL
PLAN ESPECÍFICO CENTRO SUR
(SCH#2019079022)

El 31 de mayo de 2024, un Aviso de Disponibilidad se dio aviso que la Ciudad de Fresno (Ciudad), como la Agencia Principal, ha terminado un Reporte de Impacto Ambiental (PEIR) Borrador para el Plan Especifico del Centro Sur, el cual estará siendo distribuido para revisión pública en conformidad con la Ley de Calidad Ambiental de California (CEQA) y el Código de Recursos Públicos de California, comenzando un periodo de comentario público de 45 días que se terminará el 15 de julio de 2024.

Este aviso es para anunciar que el periodo de comentario público ha sido extendido por 15 días hasta el 30 de julio de 2024, para permitir agencias públicas y partes interesadas un total de 60 días para revisar y entregar comentarios sobre el Borrador EIR. En volver a notificar sobre el Borrador EIR, la Ciudad continua de proporcionar acceso a los documentos e información sobre otros métodos de ver el Borrador PEIR.

LOCALIZACIÓN DEL PROYECTO

El Área del Plan abarca 5.567 acres situados justo al sur y al sureste del centro de Fresno. El Área del Plan se encuentra generalmente al sur de California Avenue, al norte de American Avenue y entre Fig y Peach Avenues. La zona cuenta con una amplia gama de tipos de propiedades, entre ellas industriales, almacenes, comerciales, residenciales, religiosas, educativas y públicas.

DESCRIPCIÓN DEL PROYECTO

El área del Plan alberga casi 19.6 millones de pies cuadrados de desarrollo no residencial y aproximadamente 400 unidades residenciales. El Plan asume que en 2040 se habrán construido 12 millones de pies cuadrados adicionales de usos no residenciales y 91 unidades de vivienda. El crecimiento en la zona del Plan sería principalmente industrial, con pequeñas cantidades de usos de oficina y comercio minorista. Se permitirían otros usos del suelo de acuerdo con las designaciones de uso del suelo del Plan General, pero no son el enfoque del Plan.

El desarrollo económico y el crecimiento del empleo son los principales impulsores del Plan. Como se indica en el borrador del EIR, en 2040 se habrán creado más de 14,000 nuevos puestos de trabajo con el desarrollo previsto, principalmente en el sector industrial, con un crecimiento menor, pero sustancial, de los puestos de trabajo en oficinas y comercios.

Desarrollo previsto para el Plan propuesto comparado con las condiciones existentes

Designación del uso del suelo	Existente (metros cuadrados)	Plan propuesto (metros cuadrados) para 2040
Comercio	0	866,676
Oficina	10,912	578,790
Industrial	19,624,154	10,576,278
Total No residencial	19,635,066[1]	12,021,744
Unidades residenciales	400 viviendas	91 viviendas

Notas: [1] El desarrollo existente sólo refleja las categorías de uso del suelo de empleo dentro del Área del Plan Específico.

Fuente: Ascenso 2023.

El Plan propone cambios en la designación del uso del suelo para determinadas zonas, lo que requiere una modificación del Plan General y la recalificación de las mismas propiedades. Los cambios se proponen principalmente para 1) reconciliar las designaciones de uso del suelo con las condiciones existentes, 2) amortiguar los usos sensibles (por ejemplo, zonas residenciales, Orange Center School) con usos menos intensivos (por ejemplo, parque empresarial en lugar de industrial), y 3) proporcionar más oportunidades para usos comerciales generales al servicio del vecindario cerca de las zonas residenciales. El Plan daría lugar a reducciones sustanciales en la superficie de los usos industriales pesados y a una modesta disminución en el parque empresarial regional, con los correspondientes aumentos en la superficie de los usos de parque empresarial, residencial unifamiliar, público, industrial ligero y comercial general.

DISPONIBILIDAD DEL DOCUMENTO

Direcciones donde estará disponible una copia del borrador del EIR Para su Revisión:

Ciudad de Fresno
Planning and Development Department
2600 Fresno Street, Third Floor, Rm 3043
Fresno, CA 93721

Biblioteca Pública del Condado de Fresno
2420 Mariposa Street
Fresno, CA 93721

Biblioteca Mosqueda
4670 E Butler Ave
Fresno, CA 93702

Biblioteca West Fresno
188 E California
Fresno, CA 93706

El Borrador del EIR también se puede obtener en la página web del Ayuntamiento:

https://www.fresno.gov/planning/plans-projects-under-review/#south-central-specific-plan-scsp

PERIODO DE COMENTARIO PUBLICO

La Ciudad de Fresno recibirá comentarios públicos sobre el Borrador del EIR desde el **31 de mayo de 2024** hasta el **30 de julio de 2024**. Los comentarios por escrito deberán ser recibidos **a**

más tardar a las 5pm (PST) del 30 de julio de 2024. Por favor envíe sus comentarios por escrito a Sophia Pagoulatos e incluya su nombre, dirección y número de teléfono y/o dirección de correo electrónico para que podamos comunicarnos con usted para aclaraciones, si es necesario. Los comentarios pueden entregarse en persona, por correo de primera clase o por correo electrónico a:

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Atención: Sophia Pagoulatos, Planning Manager
Teléfono: (559) 621-8062
Correo electrónico: scsp@fresno.gov

PROBABLES EFECTOS AMBIENTALES SIGNIFICATIVOS

El Borrador del EIR analiza los posibles efectos significativos del plan propuesto en relación con:

- Estética
- Recursos Agrícolas y Forestales
- Calidad del Aire
- Recursos Biológicos
- Recursos Culturales y Culturales Tribales
- Energía
- Geología y Tierras
- Emisiones de Gases de Efecto Invernadero y Cambio Climático
- Peligros y Materiales Peligrosos
- Hidrología y Calidad del Agua
- Uso del Suelo y Planificación
- Ruido
- Población, Empleo, y Vivienda
- Servicios Públicos y Recreación
- Transporte y Circulación
- Utilidades y Sistemas de Servicio
- Efectos Acumulativos

Las medidas de mitigación identificadas en el Borrador del EIR no reducirían los efectos potencialmente significativos relacionados con las siguientes áreas a niveles menos que significativos: estética, recursos agrícolas y forestales, calidad del aire, recursos culturales y culturales tribales, emisión de gases de efecto invernadero y cambio climático, y ruido. Hay propiedades dentro del Área del Plan que se sabe que tienen aguas subterráneas, acuíferos y suelos contaminados que requieren limpieza de acuerdo con 65962.5. Seis de los sitios se consideran activos y otros están en proceso de evaluación, remediación o han sido cerrados.

Se convocarán audiencias públicas tras el periodo de revisión pública, a la hora y en el lugar que se especifiquen mediante anuncio legal. Si desea que se le notifiquen las audiencias o desea información adicional, póngase en contacto con:

Sophia Pagoulatos, Planning Manager
City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Correo electrónico: scsp@fresno.gov
Teléfono: Sophia Pagoulatos (559) 621-8062 or
Adrienne Asadoorian-Gilbert (559) 621-8339

Inside Look at Fresno County Westside Solar Plan to Power 9 Million Homes - GV Wire

CALIFORNIA

Inside Look at Fresno County Westside Solar Plan to Power 9 Million Homes

By **Nancy Price, Multimedia Journalist**
Published 12 hours ago on
July 1, 2024
MORE FROM NANCY PRICE

Woolf Farming was an early adopter of leasing farmland for solar facilities in western Fresno County. (GV Wire/Jahz Tello)

HIGHLIGHTS

- A massive solar generation, storage, and transmission project on the west side of Fresno County called the Valley Clean Infrastructure Plan could generate as much as 20,000 megawatts.
- The project would provide much-needed solar electricity for California, new revenue streams for farmers and growers as water supplies diminish, and new job opportunities for farmworkers.
- Advocate say California will need projects like VCIP to meet its future zero-carbon goals.

HURON — A wide band of sun-baked land running along the Interstate 5 corridor in western Fresno County is the proposed site for a large-scale solar farming, electricity storage, and transmission project that could produce as much as 20,000 megawatts of solar-generated electricity — enough for nine million homes.

“We need to learn how to say yes to these projects.” — *Shannon Eddy, executive director, Large-scale Solar Association*

Proponents say the Valley Clean Infrastructure Plan would provide the infrastructure, including five new substations and high-voltage lines that would be needed to move that much power onto California’s electrical grid, in addition to the master-planning of up to 130,000 acres owned by Westlands Water District or held privately by farmers.

That’s nearly double the size of the city of Fresno’s footprint.

It would dwarf the solar generation facilities now operating in the region. One of the largest is Westlands Solar Park in Kings County, right next to the Fresno County line and just southwest of Lemoore. It covers 20,000 acres and produces about 1,170 megawatts with a capacity of 2,700 megawatts. By contrast, Fresno County’s largest solar farms straddle Highway 33 northwest of Cantua Creek and combine for nearly 3,000 acres and more than 400 megawatts, according to the U.S. Solar Photovoltaic Database.

Want to know where solar farms are located in the Valley and around the state? Check out the ***U.S. Solar Photovoltaic Database***

Ground Zero for California Solar

The westside of the Central Valley has been identified as a key location for solar energy generation plants, for several important reasons. It’s near the center of the state and existing transmission lines. Farmers and growers are facing a water crisis brought on by restrictions on groundwater pumping combined with decreases in surface water allocations and are in need of new revenue streams.

And the same sunshine that has made the Central Valley one of the world's most productive farm belts can be harvested as electricity.

Solar farming gives new use to land that has been fallowed either because it is drainage impaired or because of a lack of water pumped from the ground or shipped from Northern California through the state's aqueducts.

In addition to providing a new source of revenue for farmers, the massive amount of solar energy and storage that the VCIP project proposes would move California closer to meeting its mandated goal of carbon-free energy generation by 2045.

While VCIP's potential output of 20,000 megawatts might be enough for nine million homes today, in the future Californians will need even more electricity to power their vehicles and their home HVACs and appliances like water heaters and stoves as the state goes all-electric.

Clearly, future Californians will need much more solar-generated electricity, and projects like VCIP will be "critical," says Shannon Eddy, executive director of the Large-scale Solar Association, an advocacy organization for utility-scale solar developments that's based in California. Eddy notes that she's heard of only one other 20,000-megawatt project starting up, and it's in China.

California's zero-carbon future rides on getting projects like VCIP up and running, Eddy said.

"And not just this one, but really all the utility-scale solar projects are needed," she said. " … We need to learn how to say yes to these projects."

Related Story: *California Sides With Big Utilities, Trim Incentives for Community Solar …*

California's Growing Solar Needs

VCIP is being spearheaded by Golden State Clean Energy, a privately held, California-based and California-led infrastructure development company, in partnership with the Westlands Water District. Golden State's principals were involved in developing the Westlands Solar Park in Kings County.

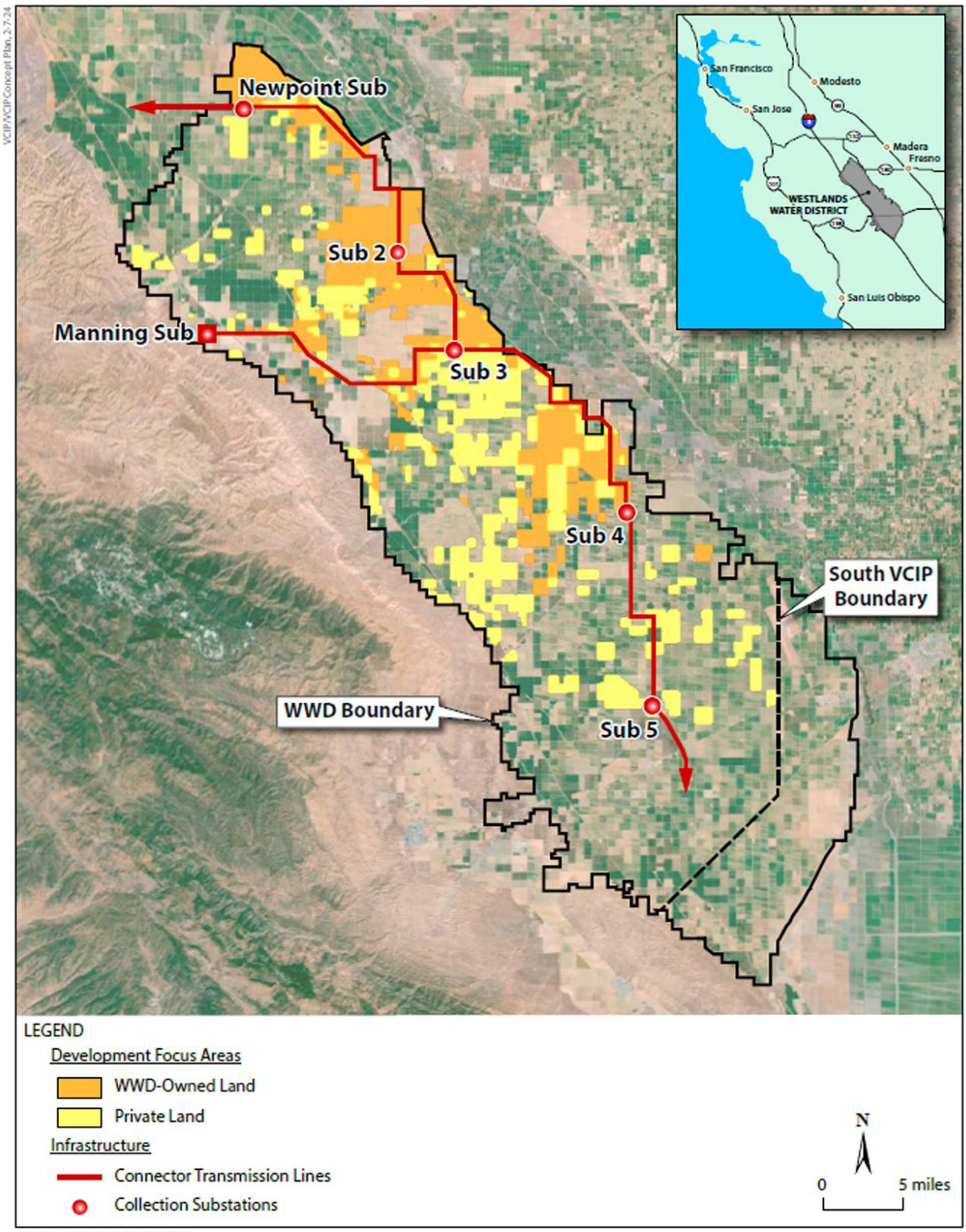
A 2021 study by the California Energy Commission, California Public Utilities Commission, and the California Independent System Operator estimated that the state would need 170,000 to 200,000 megawatts of new solar generation and battery storage to meet its energy needs by 2045, said Patrick Mealoy, a partner and chief operating officer for Golden State Clean Energy.

Projects like VCIP are needed to produce that much solar-generated electricity, Mealoy said.

“We represent an opportunity of being somewhere between 10 to upper-teens percent of what California would need between today and 2045,” he said.

An October 2022 report by the Public Policy Institute of California said that the San Joaquin Valley has “some of the best solar development prospects in the state,” in part because the region is faced with meeting the requirements of the Sustainable Groundwater Management Act that sets limits on groundwater pumping.

Some landowners, regardless of water availability, already have realized that solar developments will pay them anywhere from $1,000 to $15,000 per acre annually, depending on whether it’s for an annual lease or long-term options for purchase or an easement. That’s compared to the $200 to $450 per acre per year they earn now for annual crops, the PPIC report said. Just to hold land in options for potential solar development can net them a few hundred dollars per acre yearly, the report said.



VCIP Concept Plan

More Transmission Needed

But the increasing number of utility-scale solar developments will need a correspondingly large increase in transmission facilities. Developers and agencies will need to identify the sites and complete the permitting process “very soon” if California is to stay on track to meeting its clean energy targets, the PPIC reported.

There also will need to be increased coordination and planning integration between developers, communities, and local and state agencies with oversight responsibilities. Development permitting will need to be simplified, and state energy planning processes should become “less reactive and more proactive, in particular when it comes to understanding local land use constraints and opportunities,” the PPIC report said.

Because transmission is time-intensive to plan and permit and expensive to build, projects like VCIP need to be massive to generate enough solar-generated power to make the necessary infrastructure improvements economically feasible, Mealoy says.

“There’s been a lot of projects that were proposed, and most of them have failed, in the San Joaquin Valley because of the constraints on the transmission system. So one of the real drivers around VCIP is, we are big enough, that we can withstand the cost and long lead time necessary to build that transmission infrastructure,” he said.

When asked about the estimated cost of the project Mealoy is somewhat vague, only saying that it will be in the “tens of billions” of dollars based on current infrastructure costs.

Golden State is self-funding its related work on the project, he said.

Improving Transmission Flows

VCIP’s lines will alleviate congestion that now exists on two major transmission lines connecting Northern and Southern California, Mealoy said.

Central California, where the resources of Pacific Gas and Electric and Southern California Edison meet, is home to the most congested and constrained paths in the entire western U.S., he said.

“This project’s footprint literally straddles Path 15, which is the pinch point between flows between Northern and Southern California. So we are literally talking about doing build-out of resources and then new wires to help alleviate constraint,” Mealoy said. “There’s probably not a better spot to do a large scale, from a transmission engineering perspective. If you’re going to put a large amount of resources, you want to put it in a spot where you can flow it (electricity) in as many directions as possible to meet consumers’ needs.”

Although the infrastructure will be permanent, the land that VCIP’s contractors will need for solar generation sites will be leased over 30 years or so. So in the future if water supplies increase and if solar power generation technology improves and requires less acreage to produce equal or greater amounts of power, the land might be returned to agricultural production.

Fallowed land near Three Rocks in western Fresno County adjacent to Interstate 5 is included in the VCIP boundaries and could one day be the site for solar power facilities. (GV Wire/Jahz Tello)

New Revenue Option for Landowners

Solar projects like VCIP will give westside farmers a new and much-needed revenue stream, and also allow them to channel their limited water resources from the fallowed land leased for solar farming to land they can still use for growing crops, said Ryan Jacobsen, CEO of the Fresno County Farm Bureau.

“Every single farmer … they want to farm that ground. It’s just that the realities of the lack of reliable water supply is really hampering them from doing that.”—*Ryan Jacobsen, CEO, Fresno County Farm Bureau*

Jacobsen said he’s spoken to farmers whose land might be candidates for solar farming. “Every single farmer … they want to farm that ground. It’s just that the realities of the lack of reliable water supply is really hampering them from doing that,” he said. “And they know that’s most likely not going to get a whole lot better over the course of the next couple of decades.”

Even though Northern California’s dams are holding big water supplied by a wet winter, westside farmers have been told to prepare to receive only 40% of their full allocation, Jacobsen said. (The Bureau of Reclamation announced last Wednesday that the allocation for south of the Delta has been increased to 50%.) And the tightening restrictions on using groundwater resulting from SGMA are cutting into water supplies as well.

Susan Byers, whose family grows almonds on the westside of the Valley, didn’t know what to make of the VCIP project or its backers when she first heard of it. She asked questions, did some research, gathered information, and what she heard helped convince her that VCIP was a good option for Valley farmers and growers who, facing decreased water supplies, will need a new income source.

“I think what was appealing to me about this was the scope of the project, and their very diligent sort of master planning approach,” she said. “I am no expert by any means in solar or how everything works, but it did suggest the level of understanding and commitment and I think investment on their part. There’s a long road to making this successful, and it does seem like they’re certainly willing to do it.”

Westlands Solar Park is the region’s biggest solar energy production facility but will be dwarfed by solar farms in the Valley Clean Infrastructure Plan. (Westlands Solar Park)

Early Adopters of Solar Farm Leasing

Stuart Woolf, president of Woolf Farming Co. that’s a major farming operation on the Valley’s westside, says some Woolf land might wind up leased through VCIP. That would be in addition to the 1,200 acres just south of Woolf Farming’s headquarters on Gale Avenue south of Huron that started to be converted a decade ago to a solar farm with panels, storage batteries, and a connection to the nearby Gates substation.

Long before VCIP was a blip on the Westlands radar, Woolf Farming saw that future water supplies would become more limited and that the farming operation would need options on how to generate revenue from the land.

The plant went into full operation within the past year and can produce 40 megawatts.

Long before VCIP was a blip on the Westlands radar, Woolf Farming saw that future water supplies would become more limited and that the farming operation would need options on how to generate revenue from the land.

But it wasn't an easy or quick process, and the battle was fought on several fronts, Woolf said. He needed to convince the Fresno County Board of Supervisors to issue a Williamson Act waiver to allow solar farming on ag land, and also to convince Westlands Water District to allow Woolf to maintain its water rights, both surface and groundwater, for the parcels that would farm the sun instead of fruits and vegetables.

It took five years to convince the county supevisors that Woolf planned to continue agricultural commodity farming but should be allowed the waiver to lease some land for solar, he said: "We made the pitch that we look at it as another crop."

The Williamson Act provides property tax relief to owners of farmland and open-space land in exchange for agreeing that the land will not be developed or converted to another use. Landowners who want out of their Williamson Act contracts may be subject to a cancellation valuation of 12.5%.

Keeping Water Rights

Convincing Westlands that Woolf Farming should retain its water rights took an extra year. Woolf said he had to overcome the argument from some board members that the ranch enjoys proximity to an existing substation and power lines that other farmers don't have.

Board members told him, "It's not fair that you get to get income from a solar project and then keep your water."

"And the thing is, if you took the water on like a 1,200-acre parcel and you spread it throughout the district, the 600,000-acre district, most growers wouldn't even know they got any water," he said. "I mean, it's divided so much over so many acres that it's next to nothing."

Using the retained water rights, Woolf can now direct water to other parcels and boost supplies in those fields.

But even that isn't a complete replacement for the reduced allocations through the federal water contracts and limits on groundwater pumping required by SGMA, said Rick Blankenship, Woolf's vice president of farming.

"Keeping the surface and our pump allocation does not allow us to farm 100% of the acre. We're still having to fallow land," he said.

Woolf said that farmers whose land is distant from the existing power grid infrastructure will be able to reap the benefits of solar farming and the infrastructure connections that VCIP will provide.

Solar Projects Generate Jobs

VCIP also will generate new jobs, especially for electrical and construction workers. It's expected to create on average 3,000 construction jobs for at least 10 years and approximately 500 permanent jobs.

A 2022 PPIC report cautioned that solar workforce training programs will need to be tailored to help overcome the challenges of language barriers, a lack of transportation, lost wages, and family obligations.

Golden State has entered into project-labor agreements for the transmission and batteries projects that it builds and has already had conversations with local representatives of the International Brotherhood of Electrical Workers and westside communities about creating job training opportunities, Mealoy said.

The 2022 PPIC report acknowledged that a portion of lost agricultural jobs might be replaced by solar workforce jobs, and there could be steady work over the decades as new projects are phased in. But the report cautioned that training programs will need to be tailored to help overcome the challenges of language barriers, a lack of transportation, lost wages, and family obligations.

There's already a role model for how solar projects can create local jobs. The PPIC report said that the Westlands Solar Park's first utility-scale solar project consistently employed about 350 on-site workers, most of whom were from the Valley.

"Many project installers were also first-time workers in renewables, a testament to effective coordination between project developers and workforce training efforts," the report said.

It will be some time yet before VCIP will start hiring. The project is only about 18 months into what Mealoy estimates will be a 10- to 12-year time frame for build-out. Documents are being prepared for the draft environmental impact report that will be required under the California Environmental Quality Act, or CEQA. Some critters could be impacted by the project, but for the most part the fallowed and drainage-impaired farmland is already considered disturbed habitat and less likely to face challenges.

Westlands is conducting the environmental review for VCIP, and scoping meetings were held in February online and in person at Westlands' district office and the Cantua Creek Elementary School, deputy general manager Elizabeth Jonasson Rosas said.

She said she expects the draft Programmatic Environmental Impact Report by the end of this year.

Solar batteries such as these on a solar farm near the Woolf Farming headquarters south of Huron will be an integral part of the VCIP project. (GV Wire/Jahz Tello)

Assembly Bill Targets Westlands Solar

On June 11, Jonasson Rosas appeared alongside Assemblymember Esmeralda Soria and Marc Joseph, representing the Coalition of California Utility Employees, to provide testimony to the Senate Local Government Committee about **Assembly Bill 2661**, which Soria sponsored. AB 2661 would authorize Westlands to construct solar facilities, including battery storage, and build, own, and operate transmission lines to convey solar-generated electricity to the grid.

Earlier versions of the bill would have provided the same solar-power generation authorization to all water districts statewide. It also would have required the California Public Utilities Commission to conduct a "sensitivity analysis" on the potential for 10,000 to 30,000 megawatts of additional solar electrical generation

and then provide that analysis to the California Independent Systems Operator for its transmission planning process.

Jonasson Rosas, Soria, and Joseph testified about the bill's potential to help California meet its clean energy goals as well as produce new jobs in a region where dwindling water supplies are causing massive job losses.

"As someone that represents the Central Valley, I know that this can be a game-changer for our community," Soria said. "We can help meet the climate goals of the state, but at the same time uplift the communities that have been left behind for generations."

Joseph emphasized that the transmission facilities would still need the PUC's determination that they would be cost-effective and "a good deal for ratepayers."

Mealoy said that if AB 2661 is signed into law, it will benefit VCIP by shedding light on the project as an example of what might be built in California, but he said its passage isn't critical to VCIP moving forward.

AB 2661 is scheduled for a hearing on Tuesday, July 2, before the Senate Committee on Energy, Utilities, and Communications.

Need to Find a Common Goal

If California is going to meet its energy production goals, Eddy of the Large-scale Solar Association said the state will need the same sense of urgency, teamwork, drive, and shared purpose that Americans mustered during World War II.

"Are we willing to do what it takes? I was really struck by the D-Day anniversary. CBS had the interview, and you probably saw this, the guys that were actually on the ground on D-Day, they're still alive and they're spry and they're sharp and they're doing things," she said.

"And it's really humbling, because we have to find a way to work together at that level. And that was a time of — I hate to use the word sacrifice — that was a time of a shared effort where the men went to war and the women went to work and everything was everything. Everyone was joined in a common goal. And we need that now. And we're not accustomed to that, as a culture. I don't know what it's gonna take to get us there."

Solar power facilities operate side by side with row crops in western Fresno County. (GV Wire/Jahz Tello)

Gigawatts

For Good Jobs

Fresno Council of Governments
Policy Board Meeting
July 25, 2024

Slide Deck Updates May 27, 2024 ‘Gigawatts for Good Jobs’ Paper and References

Gigawatts

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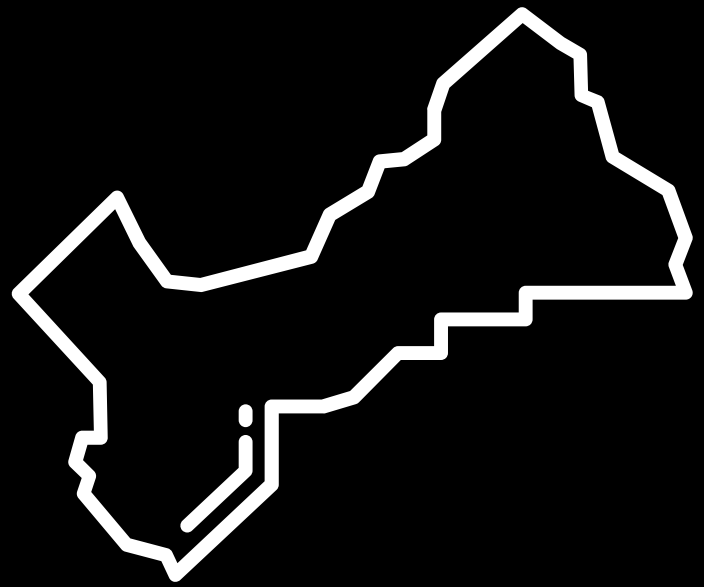


Capturing Fresno County's Clean Energy Economic Advantage

A strategy for a more equitable, healthier, and prosperous future

Key Points

- **Harness Clean Energy:** Explore how massive clean energy projects planned for Fresno County can power local industries and create sustainable jobs.
- **Address Reliable Access and Rising Costs:** Understand the impacts of unpredictable electricity access, escalating rates, the need for local control.
- **Job Creation Strategy:** Discover a plan for attracting diverse industries and maximizing job opportunities.
- **Energy Focused Organization:** Conduct comprehensive assessment and SWOT analysis of feasible locally controlled vehicles to purchase and provide power for new industry electricity services program.
- **Implementation Roadmap:** Review the strategic steps needed to realize this vision, from feasibility studies to community engagement.

Fresno County Needs an Energy Focused Organization

Uniting its Cities and Unincorporated Areas for Economic Success

- The clean energy transition is ushering in opportunities as well as risks of unpredictable supplies and costs of all types of energy.
- Fresno County needs an energy focused organization with the authority and savvy to buy, manage supply power locally for the benefit of all county businesses and institutions.
- Local ownership and management of power will also be critical for aligning the water, land, transportation, utilities and skilled workforce infrastructure investments necessary for attracting and growing industries *fueled by clean energy* with sustainably good jobs and export markets.
- A competitive and inclusive economy in the future will by necessity *require, leverage and align* locally controlled Reliable-Accessible-Renewable-Energy Resources (RARE Resources)

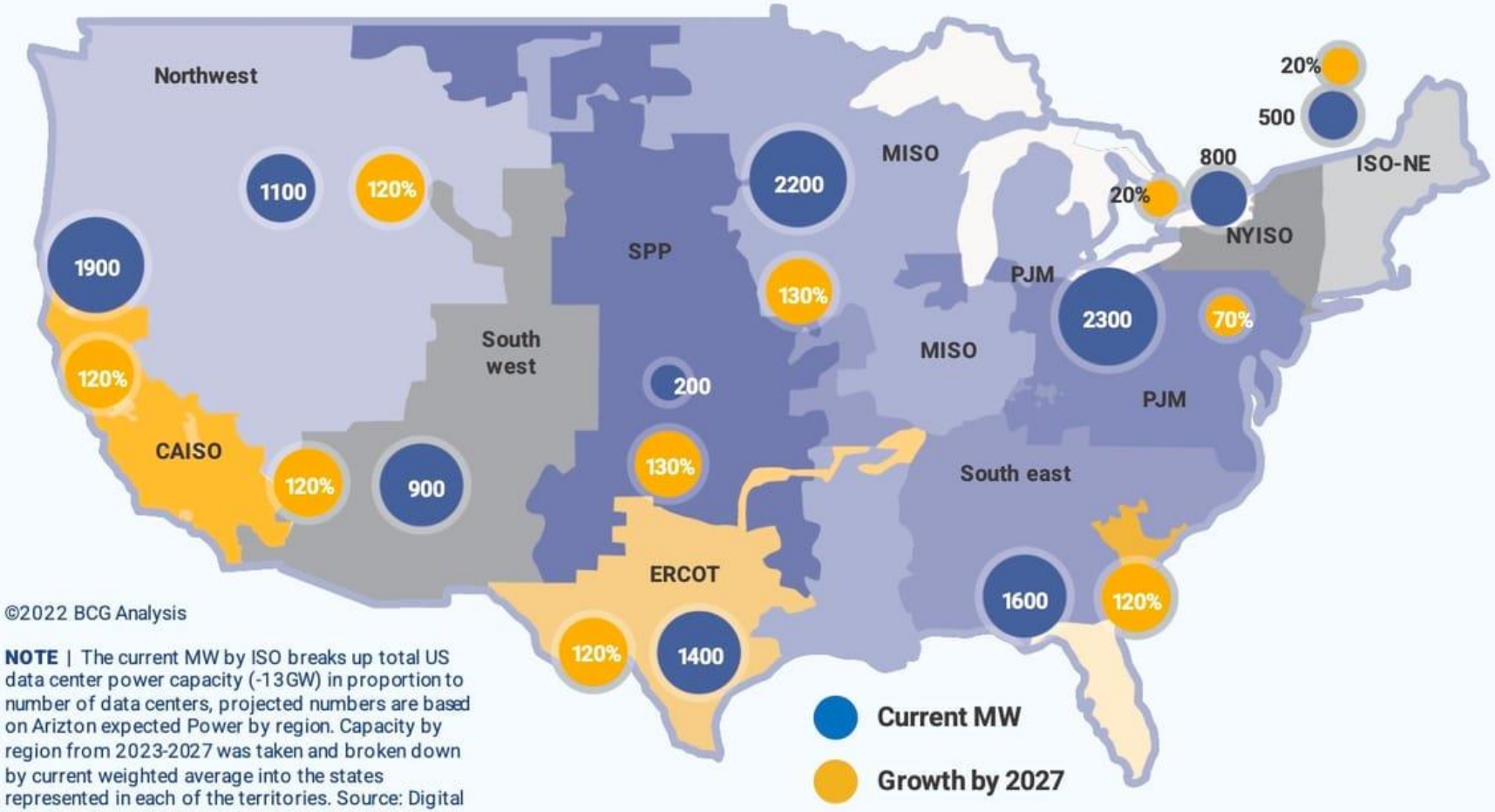
Suddenly Demand for Electricity Has Doubled and May Triple

- **Grid Demand Next 5 years:** Up from 2.6% to 4.7%
  Far higher than 0.5% annual growth last decade

- **Data Centers Alone:** Now 2.5% of total U.S. electricity demand, forecasted to explode to 7.5% by 2030

- **California Statewide Electricity Demand:** Expected to grow by 60% through 2045

>60% of Data Centers Expected in MISO, CAISO, PJM, and Southeast by 2027



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NOTE | The current MW by ISO breaks up total US data center power capacity (~13GW) in proportion to number of data centers, projected numbers are based on Arizton expected Power by region. Capacity by region from 2023-2027 was taken and broken down by current weighted average into the states represented in each of the territories. Source: Digital Infra Real Estate, Omdia, Anzton, BCG Analysis

SOURCES | Arizton, *US Data Center Construction Market – Industry Outlook and Forecast 2023-2028* (February 2023).
Avelar, Victor et. al., *The AI Disruption: Challenges and Guidance for Data Center Design* (September 2023).
Boston Consulting Group, *The Impact of GenAI on Electricity* (September 2022).
JLL, *North America Data Center Report* (H1 2023).
Mordor Intelligence, *U.S. Data Center Construction Market Size* (2023).

Announced Manufacturing Facilities since August 2022

Questions about Energy Rates and Reliability

- **Unpredictability:** Electricity Reliability and Rates
- **Persistent Inflationary Trends:** Energy costs projected to exceed inflation over the next decade. Rising demand for electricity due to new technologies and increased power needs
- **Impact:** Growing distress and fear among residential, business, and institutional customers due to reliability of local power during emergencies in other parts of state

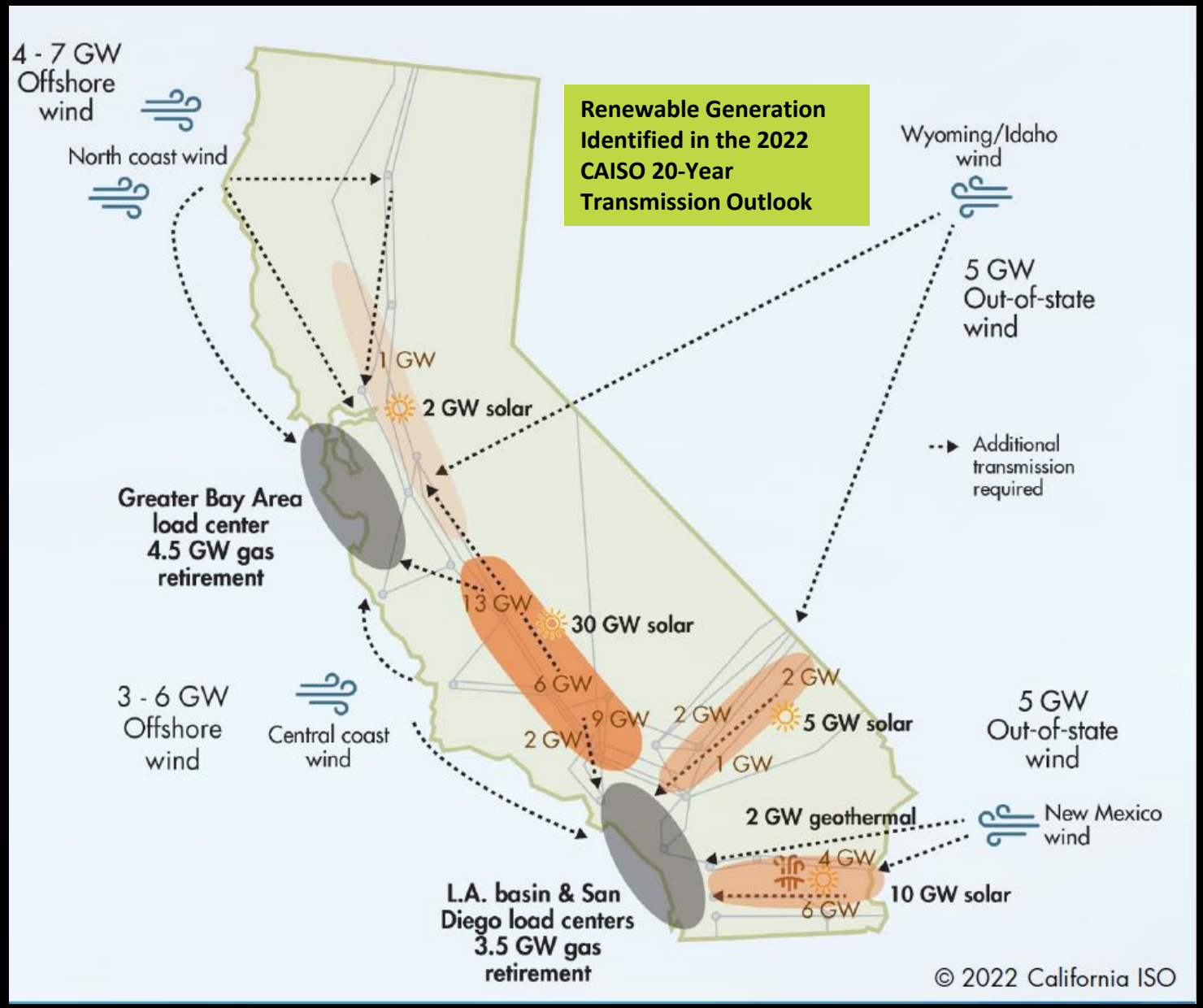
Opportunity & Urgency

- **A massive utility-scale clean energy development is planned for Fresno County**
  - Huge demand to meet state goal of 56 gigawatts by 2035
  - Global-scale cluster of solar, battery storage, and green hydrogen of 30+ Gigawatts is proposed in Fresno County alone (will be one of the largest clusters in the world)
  - The majority of the energy is planned for export across the state
- **Westlands Water District + Golden State Clean Energy:** Significant farmland acreage to be retired by Westlands and repurposed for clean energy generation. Golden State Clean Energy is the clean energy development master planner.
- **Organizing & Negotiating is Critical:** Fresno County needs to unite ASAP to negotiate with developers, secure local power, and create permanent jobs.

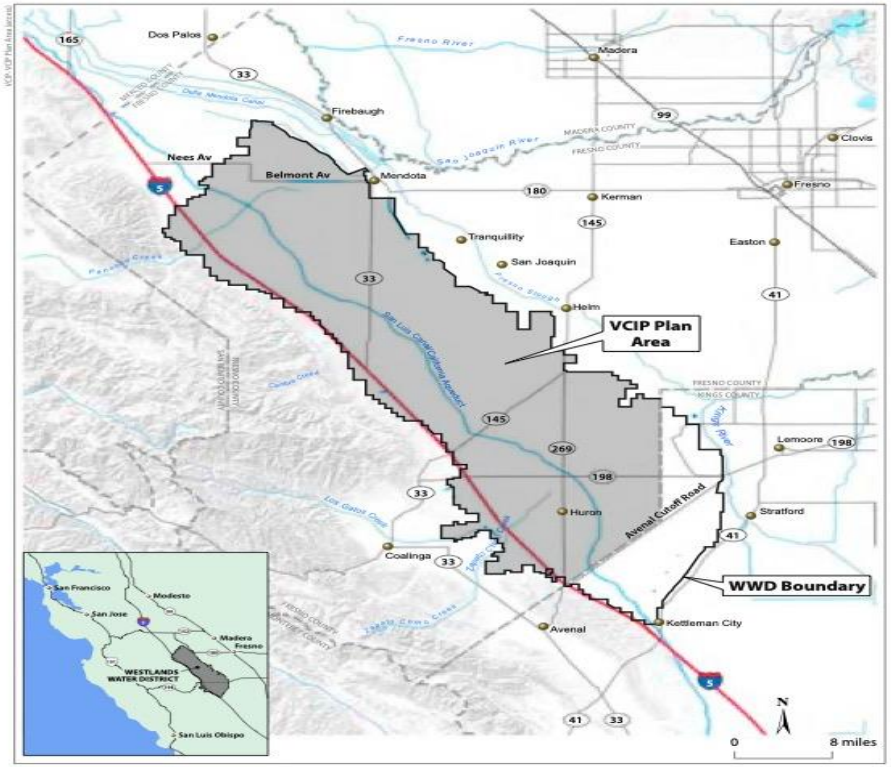
GOLDEN STATE CLEAN ENERGY

Westlands Water District

Solar Development in the Central Valley is Essential to Meet California's Clean Energy Goals



130,000+ Acres Under Evaluation for Development in Westlands Water District



Source: Westlands Water District, 2022

Figure 1
Valley Clean Infrastructure Plan
Plan Area

Valley Clean Infrastructure Plan (VCIP) is an Innovative Approach to Creating Value for Customers, Property Owners, & Local Communities (Golden State Clean Energy)

SOLAR FOR THE CLEAN ENERGY FUTURE | Approximately 20,000 MW (PV), 20,000+ MW (storage) and hundred of miles of transmission lines to help meet California's future needs in an efficient and cost-effective manner

GARNERING BROAD SUPPORT | Strong support from a wide variety of parties, including environmental groups, labor, state and local governments, and agriculture groups

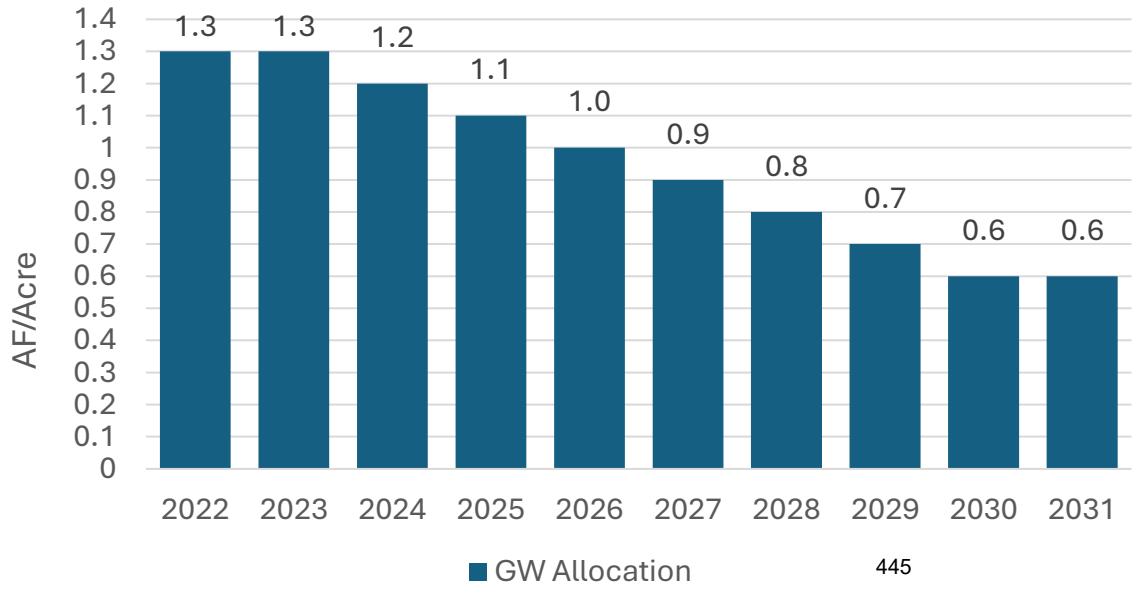
WATER BENEFITS | Saving water for productive farms while using less productive lands for solar provides a mutual benefit to the agricultural community

JOBS & ECONOMIC DEVELOPMENT | Potential for thousands of high paying jobs over the next 15+ years, plus economic development from opportunities for manufacturing, fabrication, assembly, and research and development.

Groundwater Allocation and Transition Period

Westlands Water District

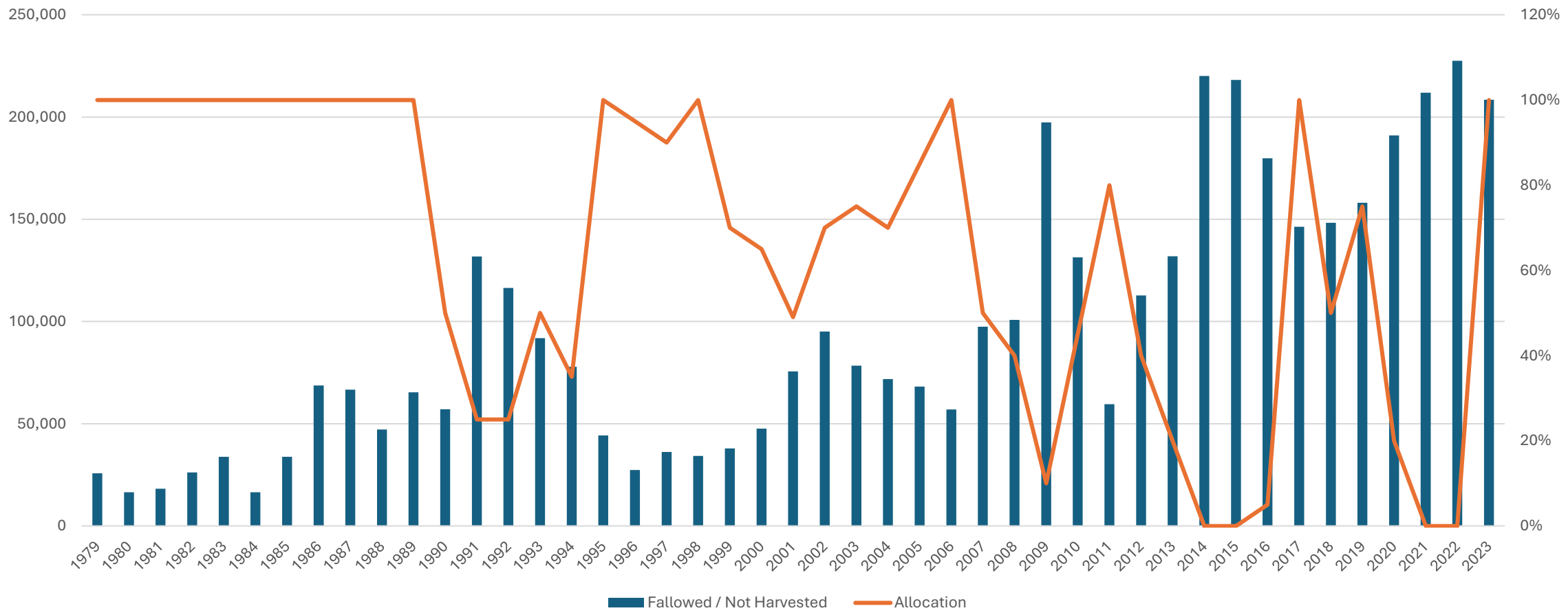
- Sustainable yield of 305,000 AF/year
- ~525,000 acres eligible receive allocation
- Starting 2022, 8-year "Transition Period"
- **1.3 AF/acre taper to 0.6 AF/acre allocation**



Water Year	Allocation Cap
2022	1.3 AF per acre
2023	1.3 AF per acre
2024	1.2 AF per acre
2025	1.1 AF per acre
2026	1.0 AF per acre
2027	0.9 AF per acre
2028	0.8 AF per acre
2029	0.7 AF per acre
2030	0.6 AF per acre

Westlands Water District

Fallowed and Not Harvested Land



Job Creation Potential

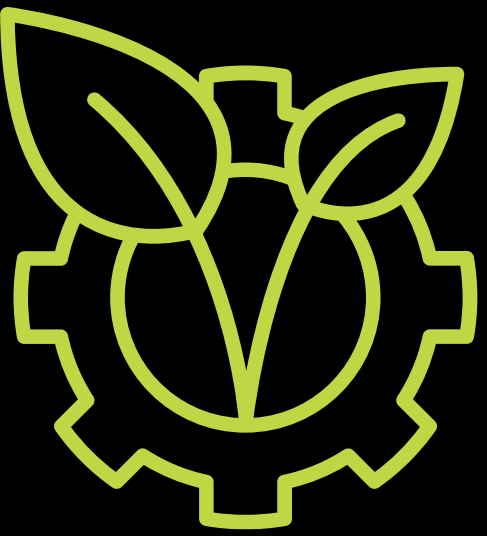
- **RAND Corporation* study:**
  - Limited permanent jobs from clean energy production
  - 4.3 Million population in the San Joaquin Valley, an estimated 4,000 jobs from the portfolio, only 1,100 direct jobs are permanent

- **We need collaborative efforts to leverage clean energy for local job creation**

- **It is critical to buy and manage electrical power locally**

*The **RAND Corporation** is an American nonprofit global policy think tank, research institute, and public sector consulting firm

Industry Opportunities



San Joaquin Valley Manufacturing Alliance (SJVMA) suggests a diversity of new manufacturing, fabrication, assembly, technology, processing and distribution industries can be grown and attracted to locate here.

- Potential to attract diverse industries: manufacturing, fabrication, assembly, technology, etc.
- Strategic alignment of energy, land use, water resources, utility and transportation infrastructure, and talent
- Create a mix of big durable industry and a venture capital start-up ecosystem envisioned by entities like HawkTower

Some Alternatives to Assess for Increased Local Control of Industrial and Other Clean Power Needs

- Irrigation Districts Supplying Electricity
- Municipal Electric Utilities
- Utility Green Tariffs
- Competitive Suppliers/Direct Access
- Purchase Power Agreements
- Local Microgrids
- Community Choice Aggregation (CCA)

Implementation Strategy

Steps to Success:

- Comprehensive feasibility study and alternatives SWOT analysis with inclusive stakeholder input (see estimated budgets)
- Meetings with key leaders from all jurisdictions
- Fund studies and planning from nonprofit, philanthropic, state, or federal sources

Estimated Budgets

Prospective Assessment for Fresno County / 15 Cities
Feasibility Study and SWOT Analyses - Estimated budgets:

1. Feasibility study: $65k +
2. Economic analysis: $25k +
3. Energy efficiency, demand reduction opportunities: $15k +
4. Clean energy sourced industrial park(s) economic analysis: $50k +
5. Remote consultant presentations to City Councils/BoS –1- 2 Meetings @ $500 per: $16k +
6. Local multi-jurisdiction engagement, consultant coordination and quality assurance: $64k
7. Grant fiscal expense: $15k

Rough total cost estimate: $250k

Inclusive Planning

**To foster economic growth and reduce poverty,
Fresno County must develop clean energy-powered industry parks that offer high-paying jobs and address environmental and community needs.**

- **Economic Development:** Essential for reducing poverty and income inequities through diverse, high-paying permanent jobs.
- **Infrastructure:** Access to rail, freeway, and air transport is crucial.
- **Community Engagement:** Collaborate with impacted communities for equitable development.
- **Environmental Considerations:** Address environmental justice, pollution, and conservation issues.
- **Clean Energy Transition:** Ensure new facilities start with 100% clean energy, balancing interim emission standards.

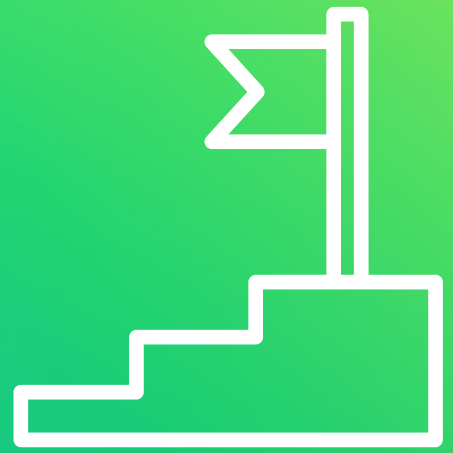
Social Determinants of Health

The Federal Plan for Equitable Long-Term Recovery and Resilience (Federal Plan for ELTRR), leverages the Vital Conditions for Health and Well-Being as a guiding framework related to The Social Determinants of Health

Integrating the Social Determinants of Health in clean energy efforts can unite diverse stakeholders for collective progress.

- **Shared Framework:** Utilize the Social Determinants of Health to align goals and outcomes.
- **Inclusive Collaboration:** Encourage diverse sectors to work together for county-wide benefits.
- **Federal Guidance:** Reference the Federal Plan for Equitable Long-Term Recovery and Resilience for integrative and inclusive strategies.

Next Steps



- With Fresno COG Leadership - Form a Fresno County Reliable Accessible Renewable Energy (RARE) Planning Committee that includes Local Governments, Labor, Businesses, Institutions, Non-Profits and Community Organizations
- Focus on leveraging renewable energy opportunities for aligning the transportation, water, land, utilities and skilled workforce infrastructure investments necessary for attracting and growing industries with sustainable good jobs and export markets
- Encourage RARE Planning Committee Partners to jointly raise grant funds for an Energy Focused Organizational Feasibility Study and Alternatives SWOT and the interrelated transportation, water, land, utilities and skilled workforce infrastructure studies and plans required for creating durable competitive economic advantage for Fresno County stakeholders
- The Fresno, Madera, Tulare and Kings Counties Central Labor Council (FMTKCLC) and Regenerate California Innovation (RCI) are ready to help organize, support and participate in all next steps

Gigawatts

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THANK YOU!

Gigawatts for Good Jobs

Capturing Fresno County's Clean Energy Economic Advantage for a More Equitable, Healthier and Prosperous Future

Introductory Summary

The draft case statement presented in this paper outlines a general logic and process for accessing and harnessing sufficient power from the massive and unique utility-scale clean energy development planned for western Fresno County to generate significant numbers of new good jobs and other benefits for the residents, businesses and institutions of Fresno County. It encourages dialogue, consideration of mutually beneficial partnerships across different sectors and stakeholder groups in Fresno County, and is aimed at complementing and supporting the clean energy scenario evaluations and job creation deliberations being conducted in the San Joaquin Valley, but with a focus on urgent and pragmatic implementation considerations specific to Fresno County. [i]

The multi-gigawatt clean power to be produced in our county is primarily intended to be exported to other regions of California to meet statewide goals. Our ability to expeditiously organize together will determine if we can secure enough long-term reliable clean electricity before it is committed to other regions, to be able to drive significant increases in local clean powered industry investment, high paying permanent jobs, community equity and environmental health. Proposed clean energy project environmental clearances and permitting have already started, we must be organized to negotiate with developers.

We will need a local joint powers authority structure capable buying and managing electricity through long-term power purchase contracts that address our local needs, goals and desired benefits. We can do so through a countywide Superordinate Community Choice Aggregation program (SUPER CCA) and by developing the clean energy powered industry parks we must have for a diverse and vibrant 21st century economy of advanced and value-added manufacturing, fabrication, assembly, technology, logistics and more.

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1. **Rapidly rising and unpredictable electricity rates are currently out of our local control**

> 'California adopts one of nation's highest fixed-utility fees' (May 9, 2024) [ii]
>
> "PG&E rates have doubled – more than doubled – in the last 10 years," Campbell said. "PG&E is unfortunately the undisputed leader in the last few years of rate increases." (January 8, 2024) [iii]
>
> "After January's rate hike, PG&E customers began paying on average 39.6 cents per kilowatt hour. The PG&E rate was 21 cents per kilowatt hour back in 2019, according to tracking data." (April 25, 2024) [iv]
>
> 'Household Energy Costs Are Projected to Increasingly Exceed Inflation Over the Next Decade' (February 2021) [v]

- For many reasons, a new multidecadal inflationary trend appears to have begun in the U.S. Not the least of the reasons for incessant inflationary pressures going forward will be persistently rising electricity rates.
- New sources of massive demand for electricity across the U.S. will drive potentially $trillions of cumulative investments in utility scale electric power generation, battery storage and transmission infrastructure, with the vast majority of these costs most likely to be passed along to rate payers. Artificial Intelligence and National Security are also quickly rising as significant urgent demand factors for both increased clean energy and fossil fueled power in the U.S.[vi]
- Extreme distress, confusion and growing anger over electricity rate actions is spreading with epidemic speed among a diversity of business, institutional and residential customers.

2. **The largest global cluster of utility scale clean electricity generation is planned for western Fresno County – but is being designed for export of the power generated locally to the rest of California to meet State goals**
   - The California Public Utility Commission approved a plan in February 2024 to add 56 gigawatts of clean energy resources by 2035, cementing the huge demand for the development of generation facilities and transmission for new clean energy sources across the state. [vii]
   - The California Independent System Operator (CAISO) maintains reliability on one of the largest and most modern power grids in the world, and operates a transparent, accessible wholesale energy market. CAISO provides a very informative Statewide Map of the 20-year Transmission Outlook for Renewable Generation.[viii]

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- The Westlands Water District has proposed significant farmland acreage to be retired and repurposed for clean energy generation (primarily utility scale solar) because of long-term irrigation water availability constraints. They have a clean energy development master planner, Golden State Clean Energy. These two entities are at the epicenter of clean energy planning and development in western Fresno County and the state. See recent presentations linked below.[ix]
- Comparative notes on the relative scale and uniqueness of clean energy development proposed in western Fresno County:
  - The largest power plant in the world is in CHINA – Three Gorges Dam at 22.5 Gigawatts
  - The largest cluster of clean energy solar planned in the world that we can find is in INDIA at 22.5 Gigawatts
  - For perspective: Diablo Canyon Power Plant produces 1.8 Gigawatts
  - Truly global scale clusters of solar, battery storage, and green hydrogen of 30 Gigawatts or more is proposed in Fresno County alone, and other types of clean energy production and transmission facilities are being planned for hundreds of thousands of the potentially one million acres of farmland likely to be retired across the eight counties of the San Joaquin Valley because of reduced water availability and an array of state and federal incentives to develop clean energy facilities.
  - Fresno County is slated for a massive portion of clean energy development in the state because of the nearly 200,000 acres of farmland to be retired and repurposed in western Fresno County.

3. **RAND Corp research suggests very few permanent jobs will come directly from clean energy production facility development and operations in the San Joaquin Valley**
   - The RAND Corporation research organization conducted a study of job creation potential in the eight county San Joaquin Valley [x] as a key part of a Clean Air Task Force initiative and report: '*An Exploration of Options and Opportunities for the San Joaquin Valley's Clean Energy Future*.' [xi]
   - See summary on RAND document page 40 linked above. "For instance, the Proportional portfolio is estimated to generate about 4,000 total jobs, of which 1,100 are direct permanent each year. While the number of both total and permanent jobs varies significantly by portfolio, the overall ratio is similar because the portfolios are dominated by solar."
   - This RAND data analysis indicates very few permanent jobs will likely come directly from clean energy production facility development and operations located within the geography of the San Joaquin Valley for the benefit of our 4.3 million population. If we want to leverage massive clean electricity generation for significantly increasing high paying permanent job creation, we will need authentic and inclusive collaborative

efforts to establish the organizational structure and capacities required to actually buy and manage electrical power for these purposes.

4. **San Joaquin Valley Manufacturing Alliance (SJVMA) suggests a diversity of new manufacturing, fabrication, assembly, technology, processing and distribution industries can be grown and attracted to locate here**
   - We posed a scenario question to the CEO of the SJVMA: "If we had access to all the land, water, and clean energy we need to drive significant attraction and organically grown new manufacturing, fabrication, assembly, tech, R&D and more here in Fresno County, what, in your opinion, would be an ideal mix of different industries that would be most advantageous to build upon and to newly attract to build a resilient/diverse economy here?"
   - The response linked below [xii] provides "an expanded list of manufacturing practices and types of companies that could be well-supported in Fresno in the future." This list gives us a starting point from the SJVMA perspective for envisioning what may be possible to achieve for our local economy if we can effectively harness clean energy at scale, productively prepare and train our existing residents, and do a much better job of collaboratively aligning our land use, water resource, and transportation infrastructure priorities going forward to focus on equitable development, environmental health, and sustainable and inclusive economic opportunities.
   - In addition, HawkTower, a venture capital fund focused on Fresno, the San Joquin Valley and Central California, has an amazing and experienced team with a compelling entrepreneurial vision for implementing a critically needed start-up company eco-system in our region that will complement new large-scale economic development driven by clean energy. [xiii]

5. **AB117 Community Choice Aggregation (CCA) is the only current state authorized and tested structure we can find for buying and controlling our own electricity**
   - Through Community Choice Aggregation (CCA), communities can join together to pool (or aggregate) their electricity load in order to purchase clean energy and develop local projects and programs on behalf of their residents and businesses. Aggregators work in partnership with the region's existing Investor-Owned Utility (IOU), which continues to deliver power and maintain the grid. [xiv]
   - CCAs provide:
     - Consumer choice, local control, and accountability
     - Policy tool to help communities reach their climate and economic goals
     - Transition to a cleaner, more efficient energy supply
     - Revenues reinvested in the community, not distributed to shareholders
     - Tool for communities to establish local energy resources and programs such as solar+storage for resilience, low-income solar, EV vehicle and

infrastructure incentives, feed-in-tariff, net energy metering (NEM), energy efficiency, demand response, and more
    - Development of new renewable energy projects
- There are 25 CCAs operating in California now serving over 14 million customers.
- In a presentation by The Climate Center in March 2023 related to analysis of a potential CCA just for the City of Fresno jurisdiction, $150 million was the rough estimate of the amount that leaves the Fresno economy every year, and that would be redirected to local control with a Community Choice agency.[xv]
- Regenerate California Innovation (RCI), through the work of Nicolas Jendian, CSUF Student Intern, has created a comparative analysis spreadsheet of eight of California's best and most notable CCAs, that we are vetting with each CCA assessed for accuracy and additional critical data. Our preliminary findings are extremely sound financial and programmatic results and positive community and business impacts across the CCAs evaluated. [xvi]

6. **A SUPER CCA can add the long-term electricity purchase capacity needed for superordinate industry development and a local economy enhanced scale of production for generating new high paying permanent jobs for our residents**
    - We can only grow, attract and support the magnitude and mix of clean energy powered industries and permanent jobs we desire, if we actually provide access to the reliable scale of clean power, land, water and transportation infrastructure, and the skilled labor force required by these industries.
    - Having local access to sufficient reliable clean energy at industry development and operational incentivizing prices should in turn incentivize all our local sectors and stakeholders to collaboratively leverage and align our mutual priorities and actions for providing the land, water, and transportation infrastructure and training programs for the local skilled labor required by these industries.
    - A Superordinate Community Choice Aggregation program (SUPER CCA) for Fresno County can provide all the opportunities, programs and benefits referenced above for CCAs, plus enter into sufficiently large, long-term, and cost-saving 20-25 year purchase power contracts directly with clean energy developers in Fresno County to meet the scale of clean electricity needed for the industries we desire.
    - A SUPER CCA founded and supported by all 15 Cities and the County of Fresno would provide the options and opportunities for comprehensive CCA-type benefits to residents, businesses and institutions in all cities and unincorporated communities in Fresno County, and be the clean energy engine for truly inclusive, integrated, equitable and sustainable 21st century economic development for our whole county.
    - The authentic collaboration reflected in accomplishing a SUPER CCA in Fresno County and its outcomes can be exemplary for all of California.

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7. **General strategy logic for Implementing a SUPER CCA in Fresno County that includes 15 Cities and the County of Fresno thinking and acting Together**
    a. Previous proposals for establishing CCAs have failed to gain traction at the City of Fresno and County of Fresno for various different reasons. All these proposals preceded awareness of the unique and significant opportunities for expanding desirable industry and significant good job creation that can be leveraged by the global utility scale clean electricity generation now planned for western Fresno County.
    b. We have talked with CCA study consultants, and various elected officials and key business and labor stakeholders about past efforts to launch CCAs and what questions need to be answered and constituencies engaged for a SUPER CCA proposal in Fresno County to get a fair hearing and real chance of approval by local jurisdictions. Our summary of a possible strategy pathway follows.
    c. A feasibility study and business plan for a SUPER CCA must be conducted and prepared by expert consultants as a collaborative effort among jurisdictions and stakeholders to ensure the scope of work for the study and business plan have inclusive input before being initiated.
    d. We found two interesting examples for referencing CCA feasibility and business plan scopes. 1. Feasibility Study: Community Choice Aggregation for the City of Stockton is a great example of a thorough standard CCA assessment that resulted in approval (Stockton actually joined the East Bay Community Energy Community Choice Aggregation joint powers authority). 2. BUSINESS PLAN FOR THE FORMATION OF A COMMUNITY CHOICE AGGREGATION PROGRAM FOR THE CITY OF SAN DIEGO (Approved and launched).[xvii]
    e. Meetings must be conducted with key staff and leaders from each of the desired 16 partnering jurisdictions in Fresno County to review and incorporate input and questions a SUPER CCA scope of work must address based on their perspectives and needs before feasibility study and business planning begins.
    f. To avoid financial conflicts of interest and minimize possible competing stakeholder interests, the estimated $250,000 cost of the feasibility study and business plan work should be secured from nonprofit, philanthropic and/or state or federal sources. The study/business plan consulting work and stakeholder/jurisdictional engagement would best be managed by a neutral group of nonprofit community-based organizations working closely through and with the Fresno Council of Governments and key local-regional economic and industry development agencies. Managing this SUPER CCA organizing process also obviously would involve seeking assistance from individual CCAs and associations supporting CCAs to draw their critical experience into our local efforts. See the rough estimate below that was informed by consultants contacted:

Regenerate California Innovation (RCI) - 285 West Shaw Avenue #201, Fresno, CA 93704
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Fresno, Madera, Tulare, and Kings Counties Central Labor Council – 2721 Ventura Avenue, #108 Fresno, CA 93721 Contact: dsavory@myunionworks.com

Prospective CCA Assessment for Fresno County/15 Cities - Feasibility Study and Business Plan - Estimated budgets:

1. Feasibility study: $65k +
2. Economic analysis: $25k +
3. Energy efficiency, demand reduction opportunities: $15k +
4. Clean energy sourced industrial park(s) economic analysis: $50k +
5. Remote consultant presentations to City Councils/BoS –1- 2 Meetings @ $500 per: $16k +
6. Local multi-jurisdiction engagement, consultant coordination and quality assurance: $64k
7. Grant fiscal expense: $15k

Rough total cost estimate: $250k

8. **In addition to buying and locally controlling reliable long-term clean energy at the scale needed – we must inclusively plan and build new clean energy powered industry parks in different locations in Fresno County**
   - It is important to acknowledge that Fresno County must develop diverse industries with higher paying permanent jobs to ever have a realistic chance of reducing perniciously high poverty and income inequities. Clean energy powered industry parks with access to rail, freeway and air transport infrastructure must be a key part of this change equation.
   - Inertia is a polite descriptor for the lack of our progress for more than several decades to advance planning in partnership with impacted communities for mutually desirable and acceptable development of new large scale industry sites needed in Fresno County that can contribute to greater and more equitable economic opportunity. There are many substantive reasons for this seemingly intractable status.
   - Environmental justice and pollution issues are real and must be effectively addressed.
   - Agricultural and habitat land, and water and other resource conservation issues are real and must be effectively addressed.
   - All legacy, disadvantaged and low-income communities must be respected, engaged and protected.
   - However, a 100% clean energy future for mobile and stationary power use with the eventuality of no emissions offers the potential to start clean energy industry development now with rigorous construction and operational standards enforced for achieving acceptable interim emission results.
   - There will be a transition period with a mix of clean and fossil fuel powered transportation, but there is no reason that new industry facility development cannot to be 100% clean from the start if it has access to sufficient 100% clean power.

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- This is the moment for all sides to come together to negotiate pragmatic compromises and management of reasonable unavoidable transition period impacts of critically needed clean energy powered industry parks. If we do not negotiate in good faith now to move our economy forward, we will have fumbled a once in a lifetime opportunity for leveraging the clean energy transition to address serious interrelated structural challenges that have limited the achievement of inclusive social, environmental and economic health and prosperity across Fresno County for at least the past 80 years. Time is of the essence.
- A 'Three Horizons Framework' may be useful in the multi-sided negotiations required for successful transition period development and managed impacts [xviii] The Three Horizons Framework has proven widely useful as a conceptual model to aid people thinking about current assumptions, emerging changes, and possible and desired futures.

9. **Elevating the value of inclusively improving 'The Social Determinants of Health' for all residents through clean energy implementation efforts can meaningfully unite diverse sectors and stakeholders to authentically work together**
   - Our individual, group and/or organizational goals, values and interests can divide or unite us in meeting critical present and future needs for all stakeholders in our entire county.
   - The Social Determinants of Health can be a uniting framework for shared goals and outcomes in our collective clean energy transition work. We reference the Federal Plan for Equitable Long-Term Recovery and Resilience (Federal Plan for ELTRR), which leverages the Vital Conditions for Health and Well-Being as a guiding framework related to The Social Determinants of Health. We believe its integrative aspects anchored by 'belonging and civic muscle' have broad and inclusive applications.

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[i] **Central Valley Community Foundation Valley CERF/S2J2:** https://www.valleycerf.org/ and **An Exploration of Options and Opportunities for the San Joaquin Valley's Clean Energy Future, Clean Air Task Force. April 2024.** https://www.rand.org/pubs/research_reports/RRA3115-1.html

[ii] **California adopts one of nation's highest fixed-utility fees. The Orange County Register. May 9, 2024:** https://www.ocregister.com/2024/05/09/california-adopts-one-of-nations-highest-fixed-utility-fees/

[iii] ***PG&E becomes California's most expensive power provider. Channel 4 LA Investigative, by Jaxon Van Derbeken, January 8, 2024:*** https://www.nbclosangeles.com/investigations/national-investigations/pge-rate-hike-california/3302833/

[iv] **Soaring PG&E power rates in 2024 approach Hawaii. Channel 4 LA Investigative, by Jaxon Van Derbeken, April 25, 2024**: https://www.nbcbayarea.com/investigations/soaring-pge-power-rates-california-hawaii/3521441/

[v] **Slide 12 of 'UTILITY COSTS AND AFFORDABILITY OF THE GRID OF THE FUTURE', CA Public Utilities Commission, February 2021:** https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/en-banc/rates-en-bancwhite-paperv20.pdf

[vi] **New energy sources for AI, data centers are vital to U.S. national security. Wall Street Journal-MarketWatch Opinion. May 22, 2024.** https://www.marketwatch.com/story/ai-and-data-centers-are-devouring-energy-resources-threatening-u-s-security-d2316452

[vii] **California PUC approves plan to add 56 GW of clean energy resources by 2035. Utility Dive, February 20, 2024.** https://www.utilitydive.com/news/california-puc-carbon-preferred-system-plan-irp-caiso/707876/

[viii] **CAISO 20 Year Transmission Outlook Update, April 18, 2024.** Presentation-20YearTransmissionOutlook-Apr18-2024.pdf (caiso.com)

[ix] **Golden State Clean Energy and Westland Water District Slides**: Westlands VCIP 4.22.24.pptx – and - Golden State Clean Energy VCIP 4-22-24.pptx

[x] **Informing Clean Energy Planning in California's San Joaquin Valley, RAND Corporation, RR-A3115-1, April, 2024**. https://www.rand.org/pubs/research_reports/RRA3115-1.html

[xi] **An Exploration of Options and Opportunities for the San Joaquin Valley's Clean Energy Future, Clean Air Task Force. April 2024**.https://cdn.catf.us/wp-content/uploads/2024/04/22145139/San-Joaquin-Valley-Clean-Energy-Transition.pdf

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[xii] **SJVMA List of manufacturing practices and types of companies that could be well-supported in Fresno in the future. March 18, 2024.** Possible Feasible Diverse Industry Sectors to Build Organically or Attract to Fresno Region - March 18, 2024, SJVMA.docx

[xiii] **HawkTower:** file:///C:/Users/Admin/Downloads/HawkTower%20for%20Underleveraged%20California%20-%20S2J2.pdf

[xiv] **California Community Choice Association (CalCCA):** https://cal-cca.org/cca-impact/

[xv] **The Climate Center, March 2023.** https://docs.google.com/presentation/d/15GCbzzJJdEFHwvpWeD_rBMNA8IbToT9Q/edit?usp=sharing&ouid=109835448918441935507&rtpof=true&sd=true

[xvi] **CCA Comparative Spreadsheet by Regenerate California Innovation (RCI). April 2024.** https://docs.google.com/spreadsheets/d/1nrqVIKcqkxU5RYewXpCBD7zVK9ltIrqq30vjmAX8wSo/edit#gid=00f

[xvii] **Stockton, CA CCA Feasibility Study:** https://stockton.legistar.com/View.ashx?M=F&ID=9234458&GUID=07BEE44D-1730-4B2F-BDF1-EDEB4575572B **– and - BUSINESS PLAN FOR THE FORMATION OF A COMMUNITY CHOICE AGGREGATION PROGRAM FOR THE CITY OF SAN DIEGO:** https://www.sandiego.gov/sites/default/files/draft_final_cca_business_plan_city_of_san_diego_october_2018.pdf - and - https://www.sandiego.gov/sustainability/clean-and-renewable-energy/community-choice-aggregation-program#:~:text=The%20City%20of%20San%20Diego,more%20competitive%20rates%20for%20customers

[xviii] **The Three Horizons of Innovation and Cultural Change:** https://medium.com/activate-the-future/the-three-horizons-of-innovation-and-culture-change-d9681b0e0b0f **- and Sharpe and Hodgson, UK Foresight Programme**: https://training.itcilo.org/delta/Foresight/3-Horizons.pdf

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Contact: keith@regenerateca.org
Fresno, Madera, Tulare, and Kings Counties Central Labor Council – 2721 Ventura Avenue, #108 Fresno, CA 93721 Contact: dsavory@myunionworks.com

From:	DePew, Rosa@EDD
To:	SCSP
Subject:	South Central Specific Plan and Environment Impact Report Comments
Date:	Tuesday, July 30, 2024 3:09:59 PM

External Email: Use caution with links and attachments

To whom it may concern:

Thank you for accepting comments on the South Central Specific Plan and Environment Impact Report. Below is my list of comments/concerns.

- Wat Brahmacariyakaram, located on Orange Ave between Central Ave and American Ave is not listed on the report
- Orange Center Elementary School is listed as being built in 1980. The school has been located on Cherry Ave for decades. Maybe even a century.
- Transformative Climate Communities Program is listed on a map and legend. No explanation of it's purpose.
- No explanation of the changes made to areas now zoned as Regional Business Park and Neighborhood Mixed Use (what are the changes?, what will be able to be built in these zones)
- No explanation of the proposed round abouts planned on North Ave and American Ave
- A simpler explanation of the truck study and what it means is needed
- No mention of the Cherry Auction. Although the Cherry Auction is located in Fresno County, the majority of traffic crosses Central Ave and Cherry Ave every Tuesday and Saturday. This traffic affects all four stops. The streets are jammed with cars and trucks.

The reports were too long and too complicated to truly understand. The residents of the area want less traffic, less pollution, less growth, or if growth is unavoidable then growth where the residents' health and safety and well-being are a top priority. The residents deserve to be taken into account without their health and safety being collateral damage to the City of Fresno and to people who don't live in the area. Thank You!

Sincerely,

Rosa DePew

[redacted]

ROBERT V. JENSEN, INC.
PETROLEUM DISTRIBUTOR SINCE 1952
P.O BOX 12907 • FRESNO, CA 93779-2907
PHONE: (559) 485-8210 • FAX: (559) 485-8503
TOLL FREE: (800) 366-8210

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Dear Planning Manager Pagoulatos:

Thank you for the opportunity to submit comments on the City of Fresno's proposed South Central Specific Plan and the related Draft Environmental Impact Report. My name is William Jensen and I am writing to submit comments on behalf of Robert V. Jensen, Inc. (RV Jensen) as its Chief Executive Officer.

Who We Are

RV Jensen is a family-owned and -operated business serving wholesale and retail clients with high quality bulk lubricants, bulk fuel delivery, fleet fueling, and emission solutions for nearly 75 years. Robert V. Jensen began operations in 1952 as a Chevron Commissioned Agent serving Fresno wholesale commercial business and farm owners. However, when Chevron converted its highest yielding agents to independent petroleum jobbers in 1979, the business expanded to offer multiple brands of oil products and emission solutions for customers across California. Today, RV Jensen is an industry leader that provides innovative and environmentally friendly products from national brands like Chevron, Shell, Pennzoil, Quaker State, 76, and Valero to customers in counties across California, including Fresno, Madera, Kings, Tulare, Kern, Stanislaus, Monterey, Merced, Mariposa, and Santa Barbara.

In recent years, we have leveraged our success with traditional petroleum fuel to become among the first in Fresno to offer a wide range of high quality, low- and zero-emission products and services. For instance, we offer renewable diesel fuel and biodiesel, which are derived solely from agricultural waste and eliminate dependency on petroleum diesel fuel while improving operational efficiency and reducing impacts to air quality. Further, in association with Advanced Emission Control Solutions (AECS), we offer California Air Resources Board compliant emissions solutions, including regulatory consultation, diesel particulate filter cleaning, maintenance, and diagnostics, and emergency generator service, among other things. But this is just the beginning. We also have plans to provide electric charging stations, renewable natural gas, hydrogen, and more. RV Jensen will continue to research additional fuel alternatives to help California to a net-zero carbon emission standard and to provide its customers with cost effective and efficient solutions to all of their fueling needs.

Our main office and headquarters are located at 4029 South Maple Avenue. We also own property at 4021 and 4033 South Maple, which we use for RJV's Truck Stop, a warehouse, shop, and office. Most recently, we purchased 4335 South Maple to support our expansion of low- and zero-emission fuel product offerings and services. These parcels, which are all within the South

Central Specific Plan (SCSP) area, were an ideal location for our business due to their Heavy Industrial zoning, close proximity to key Central California transportation corridors, and close proximity to the Kinder Morgan Fresno Pipeline Terminal—part of a 3,300 mile-long refined products pipeline system transporting gasoline, diesel, and turbine fuel to California, Arizona, Nevada, Oregon, and Washington.

RV Jensen has 87 employees consisting primarily of Fresno residents, including residents of the SCSP area. In 2023 the company generated approximately $9 million in sales tax, consisting of $2 million in local taxes and $7 million in state taxes. Our company has a history of charitable donations throughout the San Joaquin Valley and continues to support public safety within SCSP by supporting organizations such as Crime Stoppers.

Concerns Regarding the South Central Specific Plan and the Draft EIR

RV Jensen has significant concerns regarding the SCSP, including the lack of notice provided to affected landowners, its seemingly arbitrary downzoning of certain parcels, and its creation of "buffers" that restrict or eliminate certain types of development on properties within 1,000 feet of "sensitive uses"—i.e., "residences, schools, religious institutions, playgrounds, child-care centers, hospitals, retirement homes, and convalescent homes."

Arbitrary Downzoning of Certain Parcels. As noted above, RV Jensen purchased 4335 South Maple to support our expansion of low- and zero-emission fuel product offerings and services, including a hydrogen fueling station and, eventually, an alternative fuel production facility. The parcel is currently zoned Heavy Industrial and is adjacent to the Kinder Morgan Fresno Pipeline Terminal. Its longstanding Heavy Industrial zoning and proximity to several other longstanding Heavy Industrial uses, including several other parcels owned and used by RV Jensen, make it an ideal location to support our low- and zero-emission fuel expansion efforts.

Using the parcel in this manner would also advance six of SCSP's eight objectives without interfering or in any way compromising the remaining two. Using the parcel to support RV Jensen's low- and zero-emission expansion efforts would "promote inclusive and sustainable economic growth and attract development that focuses on emerging markets and new technologies," help "create diverse employment opportunities," "preserve the viability of existing industrial and manufacturing operations in the Plan Area," "protect existing and future development from adverse impacts associated with incompatible uses, "improve Plan Area infrastructure," and "improve visual quality when entering the Plan Area." At the same time, it would in no way compromise the City's objectives related to the consideration of "project-specific environmental effects . . . on existing and potential future sensitive receptors" or providing "residents with clear and transparent access to information regarding community development and assist in addressing disputes and concerns."

Under these circumstances, one might expect the City and the SCSP to support RV Jensen's plans to develop the parcel to support the company's low- and zero-emission fuel expansion efforts. However, that has not been the case. When we submitted a site plan to the City's Development Review Committee in February of 2019, we were advised that "IN NO EVENT WILL COMMERCIAL OR INDUSTRIAL DEVELOPMENT BE PERMITTED" because the

parcel is "BEYOND THE THREE-MILE RUNNING DISTANCE OF AN EXISTING AND OPERATING FIRE STATION." According to City staff, Section 12-4-4.508 of the Fresno Municipal Code prohibited any commercial or industrial development not within 3 miles of a fire station. Since the parcel was 3.2 miles from the nearest fire station—.2 miles farther than permitted under Section 12-4-4.508—all commercial and industrial development was prohibited. This development was a massive setback for our company's planned expansion into the alternative fuel space and a huge disappointment personally.

Then in 2020 we learned that the SCSP proposed to change the parcel's zoning from Heavy Industrial to Residential. Certain that there must have been some mistake, I contacted City staff to inquire. Summer Cecil, a Project Manager in the City's Planning and Development Department, informed me that in proposing residential uses for purposes of the SCSP, "staff reviewed the entire plan area and proposed zoning parcels that had existing uses to match those uses" and that "after reviewing the subject parcel, we did see a home on the land which is why we proposed this change to residential." Presumably, staff's "review" of the parcel consisted of locating it on Google Maps without conducting any in-person visual inspection or otherwise attempting to confirm the parcel was actually being used for residential purposes, as **the "home" prompting the proposed downzoning is an abandoned and boarded house that has not been used for residential purposes in at least 20 years**. Pictures of the "home" are enclosed with this letter. As you will see, it is abundantly clear that **the parcel has not been used for residential purposes in many years and is not even remotely fit for human habitation**. Although at the time staff appeared to acknowledge that the proposed rezoning of this parcel was an "error," no changes have ever been made. The SCSP still proposes to rezone the parcel from Heavy Industrial to Residential.

Obviously, the rezoning of this parcel to Residential would have significant implications for my business. Not only would it prevent our planned expansion of low- and zero-emission offerings, it would also subject our other properties to the heightened development requirements for uses within the 1,000 foot buffer zone. Why? Because a dilapidated and abandoned residential structure has not yet been demolished due the Fresno Municipal Code's effectively prohibiting the parcel's development for any purpose. **This makes no sense whatsoever and is completely contrary to the City's stated objectives for the SCSP**. If the City is serious about promoting development associated with emerging technologies, preserving existing and future industrial uses, avoiding adverse impacts associated with incompatible uses, improving infrastructure and visual quality within the SCSP area, then the City absolutely should not make 4335 South Maple a residential use. Instead, it should retain the parcel's existing Heavy Industrial zoning and exempt it from the requirement that a fire station be located within 3 miles if the parcel is to be used for commercial or industrial uses.

Heightened Requirements in Buffer Zones. RV Jensen is also concerned that the buffer zone requirements are in many cases excessive and/or unnecessary and would make new or expanded uses at its existing facilities completely infeasible, including planned uses to promote low- and zero-emission products, services, and infrastructure.

Our understanding is that if the proposed plan is adopted and RV Jensen later desires to expand its existing facilities or uses, then it will be required to obtain a conditional use permit from the City, to meet the California Air Resources Board's criteria for zero or near zero emissions

facilities as defined in the July 2016 California Sustainable Freight Action Plan, and to comply with a number of other costly and time-consuming construction and operational requirements. While RV Jensen is a proud supporter of low- and zero-emission technologies and the transition to such technologies, the SCSP's requirements would impose a significant financial and procedural burden and would significantly undermine the feasibility and desirability of proceeding with any such projects at RV Jensen's existing Fresno facilities. The requirement to obtain a conditional use permit, in particular, would inject significant expense and uncertainty into potential projects while also drastically increasing the time needed to complete them and the risks associated with project opponents.

Additionally, the 2016 Sustainable Freight Action Plan does not actually specify many concrete standards. As a result, it is unclear what the requirement to comply with this document actually means and whether it will impose more or less demanding standards than what is required under the California Air Resources Board's existing zero emissions regulations. Complying with more onerous electrification requirements would obviously increase an already-significant financial burden. Moreover, it seems imprudent to mitigate perceived environmental impacts based on as-yet undefined standards and requirements that may ultimately impose a substantial financial burden in exchange for a relatively minor environmental benefit.

The various other construction and operational requirements would be similarly costly and would also likely render many new or expanded uses infeasible at our Fresno location—independent from the issues described above. In addition to being extremely costly, these requirements are novel. No similar requirements exist in the other jurisdictions where our facilities are located. It is therefore difficult to imagine any circumstances in which a reasonable business case could be made to proceed with new or expanded uses at our Fresno facility. Instead, we would be forced to consider relocating some or all new or expanded operations to other Central Valley jurisdictions, such as Madera County or the City of Visalia, that lack buffer zones or onerous development standards such as those proposed here.

To address these issues, the City should decline to adopt the South Central Specific Plan as proposed. The City should instead eliminate or substantially limit the geographic scope of the buffer zone concept, remove the requirement for a conditional use permit for new or expanded uses on properties in a buffer zone, remove the requirement to comply with the 2016 Sustainable Freight Action Plan, and remove or substantially reduce the host of construction and operational requirements for facilities located in a buffer zone.

Lack of Notice. It is disappointing and unfair that the City declined to provide affected landowners notice that the SCSP might alter the zoning of their properties. Despite owning four parcels that are proposed to be downzoned, neither I, nor my business, received notice from the City regarding the publication of the draft SCSP, the circulation of the DEIR, or the public comment period on the DEIR. It should not be necessary to hire a land use specialist, such as an attorney, to learn about a potential action that could directly affect my business's property and, by extension, my livelihood. It seems unlikely that my company is the only affected landowner who did not receive notice. Others may have reasonably relied on the City's failure to provide notice

to affected landowners as indicating that their property would not be unilaterally downzoned against their wishes, as I likely would have had I not learned of the SCSP through non-official channels.

Before approving the SCSP or the DEIR, the City should first provide notice to affected landowners to ensure that they are afforded a meaningful opportunity to comment on the project and its potential environmental impacts. Landowners within the SCSP area obviously have an interest in this project and its potential to impact their properties, their businesses, and the community and therefore their participation in the decisionmaking process should be encouraged—not only to protect their legitimate property interests but also to improve the quality and integrity of the City's decisionmaking.

Conclusion

For all of the reasons mentioned above, RV Jensen urges the City not to adopt the South Central Specific Plan as currently proposed. The proposed plan will be catastrophic for my business and, in particular, our plans to expand our offerings of low- and zero-emission fuel products and services. The proposed rezone of 4335 South Maple makes no sense whatsoever and is completely contrary to the City's stated objectives for the SCSP. Further, the buffer zone concept threatens to make many new or expanded uses infeasible without giving appropriate consideration to how this will impact businesses or the extent to which it will incentivize businesses to pursue employment-generating projects in other competitive markets.

Thank you for the opportunity to comment on the proposed plan.

Sincerely,

William V Jensen

William V. Jensen
Chief Executive Officer
Robert V. Jensen, Inc.

Enclosures

This buildings to use A$ office/Restrooms WAS left based on city ordinance

July 24, 2024

City of Fresno Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Dear Ms. Pagoulatos,

On behalf of the San Joaquin Valley Manufacturing Alliance (SJVMA), I am writing to submit our comments on the South-Central Specific Plan (SCSP) and the related Environmental Impact Report (EIR). As a representative voice of the manufacturing industry in the San Joaquin Valley, we have serious concerns about the potential adverse impacts of the SCSP as currently drafted.

Who We Are and What We Do

The SJVMA is a robust coalition with over 1,450 members, including manufacturers and those that support the industry such as suppliers, educational institutions, government agencies, and nonprofits, making it the strongest organization of its kind in California. Our members have chosen Fresno for its strategic advantages, including access to a skilled workforce, affordable industrial space, and logistical benefits. These factors have enabled our members to provide quality job opportunities, contribute significant tax revenue, and support various community initiatives.

Our manufacturing businesses are integral to the local economy, serving essential industries such as agriculture, construction, and logistics. In Fresno, manufacturing companies employ over 25,000 people, accounting for approximately 10% of the city's total workforce. This diverse workforce includes a significant percentage of minority groups, reflecting the community's demographics. Moreover, the manufacturing sector contributes nearly $4 billion annually to Fresno's economy, highlighting its critical role in sustaining local economic health.

Comments on the SCSP

1. **Downzoning Concerns**
   The SCSP proposes downzoning several properties from Heavy Industrial to Light Industrial and from Light Industrial to Business Park or Regional Business Park. This shift is problematic for manufacturers serving critical industries. For example, "Animal Food Manufacturing" and "Chemical Manufacturing," essential for the agricultural sector, are not permitted in the Light Industrial zoning district. This restriction severely limits operational locations for these critical uses.

   Additionally, the lack of notification to affected property owners about these zoning changes undermines trust and deters future investment. It is essential for the City to maintain a stable and predictable regulatory environment to encourage economic growth.

2. **Buffer Zones**
   The SCSP introduces 1,000-foot buffer zones from "sensitive uses," covering nearly half of the SCSP area. These buffers prohibit certain industrial activities, convert others to conditional uses, and require extensive Health Risk Assessments. This imposes significant operational and financial burdens on businesses without clear benefits, potentially driving new industrial developments and jobs to neighboring municipalities.

3. **Mitigation Requirements**
   The SCSP imposes costly and potentially infeasible mitigation measures on landowners seeking permits. These include mandatory rooftop solar installations, zero-emission truck and equipment requirements, and various infrastructure upgrades. These measures add substantial costs and operational challenges, stifling economic development and innovation. For instance, requiring all buildings over 400,000 square feet to install rooftop solar panels to supply 100% of their power needs is economically burdensome and technologically challenging.

4. **Generally Applicable Requirements**
   The SCSP mandates numerous generally applicable requirements, such as zero-emission operational equipment and the use of locally sourced or recycled construction materials. While these goals are commendable, the practical implementation poses significant challenges. For example, transitioning all Class 7 and 8 trucks to zero-emission by 2026 is more aggressive than CARB's Advanced Clean Fleets regulation, imposing an undue burden on businesses.

The proposed SCSP, as currently drafted, imposes numerous onerous and economically infeasible requirements on the manufacturing industry. These measures threaten the viability of existing businesses, deter new investments, and ultimately harm Fresno's economic growth.

We urge the City of Fresno to reconsider the SCSP's proposed zoning changes, buffer zones, and mitigation requirements. It is crucial to strike a balance between environmental goals and economic sustainability, ensuring that Fresno remains a thriving industrial hub.

Thank you for considering our comments.

Sincerely,

Genelle Taylor Kumpe
Chief Executive Officer

genelle@sjvma.org
559.250.0453

Mario Persicone
Chair, SJVMA
President/CEO, Pro Laser Graphics
Director of Operations, PNM Company

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

July 30, 2024

Jennifer Clark
City of Fresno
Planning & Development
2600 Fresno Street
Fresno, CA, 93721

Project: Draft Environmental Impact Report for the South Central Specific Plan (SCH No. 2019079022)

District CEQA Reference No: 20240657

Dear Ms. Clark:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) from the City of Fresno (City) for the South Central Specific Plan (SCSP) project. The SCSP proposes land use designation changes for areas within the SCSP planning area to support future development for up to 866,676 square feet of retail space, 578,790 square feet of office space, 10,576,278 square feet of industrial space, and 91 dwelling units (Project). Additionally, the SCSP would establish a planning framework, and development standards to facilitate and guide future development within the planning area, which is approximately 5,600 acres. The Project covers the southern portion of Fresno, and includes land outside of Fresno but within the City's sphere of influence. The SCSP planning area also lies within one of the 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 (Garcia) in an effort to reduce air pollution exposure in impacted disadvantaged communities. See Figure 1 below.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
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Central Region (Main Office)
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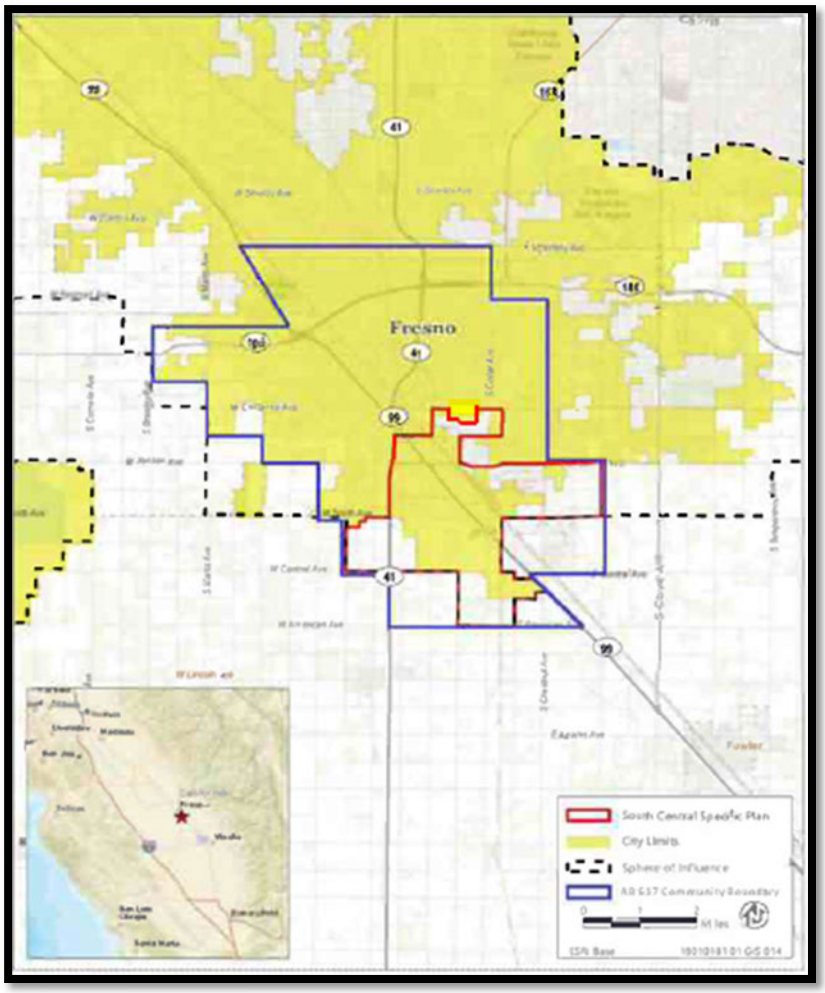
www.valleyair.org www.healthyairliving.com

Printed on recycled paper.

Figure 1: Boundaries of the AB 617 South Central Fresno and Fresno South Central Specific Plan



The District offers the following comments at this time regarding the Project:

1) Assembly Bill 617

AB 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 statewide communities selected by CARB for development and implementation of a CERP.

Following extensive community engagement and collaboration with the Community Steering Committee, the CERP for the South Central Fresno Community was adopted by the District's Governing Board in September 2019 and by CARB in February 2020.

During the development of the CERP, the Community Steering Committee expressed concerns regarding the proximity of emission sources to nearby sensitive receptors like schools, homes, day care centers, and hospitals, and the potential future industrial development within the community that may exacerbate the cumulative exposure burden for community residents. The Community Steering Committee also expressed the desire for more meaningful avenues of engagement surrounding the land-use decisions in the area. As these issues can most effectively be addressed through strong partnerships between community members and local land-use agencies. Furthermore, the District recommends the City assess the emission reductions measures and strategies included in the CERP and address them in the DEIR, as appropriate, to align the City work with the air pollution and exposure reduction strategies and measures outlined in the CERP.

For more information regarding the CERP approved for South Central Fresno, please visit the District's website at:
http://community.valleyair.org/selected-communities/south-central-fresno

2) Voluntary Emission Reduction Agreement (VERA)

- DEIR mitigation measure 4.3-1a states "…*development project applicants shall prepare and submit … an AAQA to determine whether any SJVAPCD annual emissions thresholds are exceeded or if a future project's emissions may result in the violation of an AAQS."* The District recommends that an air quality assessment be performed for individual future development projects. The air quality assessment shall include: 1) quantification of construction and operational mass emissions for the individual future development projects to determine if District annual significance thresholds would be exceeded; and 2) an Ambient Air Quality Analysis to determine if emissions increases from the individual future development projects will cause or contribute to a violation of State or National Ambient Air Quality Standards.

- DEIR mitigation measure 4.3-1a also states, "*…prior to the issuance of Certificate of Occupancy, future development will engage in a voluntary emissions reduction agreement (VERA) through coordination with SJVAPCD...*" The District recommends engagement of a VERA between the District and individual future development projects applicant be conducted early in the project design stages prior to applying for project-level approval from the City, consistent with Rule 9510 (Indirect Source Review) applicability requirements. This will allow sufficient time to determine the extent of the air quality emissions, targeted

emission reductions to be achieved, with the goal of ensuring contemporaneous emission reductions.

Based on the above, the District is recommending the following revisions to mitigation measure 4.3-1a (see strikeout and underline below):

"Prior to future individual discretionary project approval, and once all feasible on-site reduction measures have been incorporated, development project applicants shall prepare and submit to the Director of the Fresno Planning and Development Department, or designee, an ~~AAQA~~ air quality assessment to determine whether any SJVAPCD annual mass emissions thresholds are exceeded or if a future project's emissions may result in a violation of an AAQS. If no thresholds are exceeded, no further action is necessary. If one or more thresholds are exceeded, ~~prior to the issuance of Certificates of Occupancy,~~ future individual development projects will engage in a voluntary emissions reduction agreement (VERA) prior to applying for project-level approval from the City ~~through coordination~~ with SVJAPCD to reduce emissions to ~~meet~~ below SJVAPCD's annual mass emissions thresholds for any pollutant that exceeds the respective threshold. The project applicant shall engage in a discussion with SVJAPCD prior to the adoption of the VERA to ensure that feasible mitigation has been identified to reduce emissions to a less-than-significant level consistent with the direction given in SVJAPCD's GAMAQI. ~~As allowed by SJVAPCD, t~~ The project applicant shall be provided the opportunity to perform an additional quantification of the project's operational emissions to estimate the type of reduction needed to reduce emissions to ~~meet~~ below SVJAPCD's annual significance thresholds ~~of significance~~."

3) Mitigation of Construction Related Criteria Pollutant Emissions

DEIR mitigation measure 4.3-1b states *"prior to issuance of future construction contracts, to reduce impacts from construction-related diesel exhaust emissions resulting from development under the SCSP, construction contractors shall demonstrate that they shall use the cleanest available fleet of heavy-duty equipment. This can be accomplished through submitting Construction Clean Fleet paperwork to SJVAPCD."*

The District would like to clarify that when individual future development projects are subject to District Rule 9510 (Indirect Source Review), the project applicant may commit to reducing construction emissions by using less polluting construction equipment, which can be achieved by utilizing add-on controls, cleaner fuels, or newer lower emitting equipment. The mechanism for satisfying such commitment is the project applicant is required to submit to the District a Construction Clean Fleet Data report, which includes records of each piece of equipment used during construction activities, equipment model year, horsepower, fuel type and hours of operation. Upon receipt, the District then conducts an analysis to determine if construction mitigation requirements under Rule 9510 have been achieved (i.e. 20%

NOx, and 45% PM10). Based on the above, the District recommends this mitigation measure be revised to reflect for individual future development projects within the SCSP planning area that are subject to Rule 9510, the City should require project applicants to provide to the City Rule 9510 approval documentation, which would include Construction Clean Fleet paperwork for such projects making construction clean fleet commitments.

4) Mitigation of Permitted Stationary Source Related Criteria Pollutant Emissions

DEIR mitigation measure 4.3-lh states *"Owners, operators, or tenants shall prohibit the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets ARB Tier 4 emission standards."* The District would like to clarify that the determination of BACT requirements is determined at the time the Authority to Construct (ATC) permit is issued. Additionally, BACT is not a static requirement and is constantly evolving with the development of newer and cleaner technologies. Therefore, the District recommends revising mitigation measure 4.3-lh to require that generators meet BACT as determined by the San Joaquin Valley Air Pollution Control District at the time of ATC issuance.

5) Health Risk Assessment (HRA)

- DEIR Section 5.4.3 states, *"… TACs generated from development of the proposed plan, its contribution is significant because of the scale of development; the uncertainty in the number, type, and location of TAC sources; and the level of associated health risk exposure that would result at any one location. It cannot be determined with certainty that future TAC concentrations would not expose any receptors to levels that exceed 20 in 1 million when combined with other projects. Consequently, the proposed plan's contribution to cumulative TACs impacts would be cumulatively considerable.*" The District recommends the City ensure a health risk assessment is performed for all individual future development projects, to ensure no significant health risk situations occur at any receptor location as a result of this Project.

- DEIR mitigation measure 4.3-3a states, "*A site-specific HRA shall be required for all construction projects anticipated to last more than six months and located within 1,000 feet of sensitive receptors...*". The California Office of Environmental Health Hazard Assessment (OEHHA) discusses this issue in Section 8.2.10 (Cancer Risk Evaluation of Short Term Projects) of their Air Toxics Hot Spots Program Risk Assessment Guidelines document (February, 2015). OEHHA warns that "*There is valid scientific concern that the rate of exposure may influence the risk – in other words, a higher exposure to a carcinogen over a short period of time may be a greater risk than the same total exposure spread over a much longer time period.*" For this reason, OEHHA recommends evaluating health impacts from emissions with exposure periods exceeding two

months. As such, the District recommends the City require individual future development projects perform an HRA for all individual future development projects exceeding two months of construction.

- DEIR mitigation measure 4.3-3b states, "*A site-specific HRA shall be required for the operation of projects that propose the use of TAC-emitting equipment or industrial processes located within 1,000 feet of sensitive receptors…*" Depending on the type, quantity and method of emissions, toxics can significantly impact receptors at distances greater than 1,000 feet. Sensitive receptors are children, the elderly, asthmatics and others whose are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these receptors may be present include residences, worksites, schools, daycare facilities, hospitals, convalescent facilities, parks and playgrounds, etc. All locations where sensitive receptors may be present in both the short and long-term should be evaluated when performing a health risk assessment. The District recommends the City require individual future development projects perform an HRA for operational activities that emit toxic pollutants.

6) Individual Future Development Projects Trip Length for Heavy Heavy-Duty (HHD) Truck Travel

Since the Project includes industrial uses, the City should ensure individual future development projects adequately characterize and justify an appropriate trip length distance for off-site HHD truck travel to and from the individual future development projects site. Based on the following factors: 1) the individual future development projects consists of industrial uses that are expected to generate a high volume of HHD truck trips, and 2) HHD trucks generally travel further distances for industrial uses. The District recommends individual future development projects characterize an appropriate trip length distance for HHD truck travel, and reflect such appropriate distance supported by project-specific factors.

7) Industrial/Warehouse Emission Reduction Strategies

Since the Project will include the development of industrial uses, the District recommends the City incorporate emission reduction strategies that can reduce potential harmful health impacts. In addition to those strategies contained in mitigation measure 4.3-3c, the District recommends the City incorporate the following strategies:

- Orient loading docks away from sensitive receptors unless physically impossible
- Require loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks
- Incorporate signage and "pavement markings" to clearly identify on-site

circulation patterns to minimize unnecessary on-site vehicle travel
- Require truck entries be located on streets of a higher commercial classification
- Require all building roofs are solar-ready
- Require all portions of roof tops that are not covered with solar panels are constructed to have light colored roofing material with a solar reflective index of greater than 78
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the individual future development projects
- Require power sources at loading docks for all refrigerated trucks have "plugin" capacity, which will eliminate prolonged idling while loading and unloading goods
- Incorporate bicycle racks and electric bike plug-ins
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Inform the individual future development projects applicant of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the individual future development projects
- Ensure all landscaping be drought tolerant

8) On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the City consider incorporating solar power systems as an emission reduction strategy for individual future development projects under the SCSP.

9) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. Individual future development projects subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to individual future development projects, or to obtain information about District permit requirements, the individual future development projects applicant are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

9a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

Individual future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, individual future development projects applicant shall obtain an ATC permit from the District for equipment/activities subject to District permitting requirements.

Recommended Mitigation Measure: For individual future development projects subject to permitting by the San Joaquin Valley Air Pollution Control District, demonstration of compliance with District Rule 2201 (obtain ATC permit from the District) shall be provided to the City before issuance of the first building permit.

For further information or assistance, individual future development projects applicant may contact the District's SBA Office at (559) 230-5888.

9b) District Rule 9510 - Indirect Source Review (ISR)

Individual future development projects within the SCSP area may be subject to District Rule 9510 if upon full buildout, the individual future development projects would equal or exceed any of the following applicability thresholds, depending on the type of development and public agency approval mechanism:

Table 1: ISR Applicability Thresholds

Development Type	Discretionary Approval Threshold	Ministerial Approval / Allowed Use / By Right Thresholds
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

District Rule 9510 also applies to any individual future transportation or transit development projects where construction exhaust emissions equal or exceed two tons of NOx or two tons of PM.

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

In the case the individual future development projects are subject to District Rule 9510, per Section 5.0 of the rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency so that proper mitigation and clean air design under ISR can be incorporated into the public agency's analysis.

Information about how to comply with District Rule 9510 can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview

The AIA application form can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

District staff is available to provide assistance with determining if individual future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

9c) District Rule 9410 (Employer Based Trip Reduction)

An individual future development project may be subject to District Rule 9410 (Employer Based Trip Reduction) if it 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.

Information about District Rule 9410 can be found online at: https://ww2.valleyair.org/compliance/rule-9410-employer-based-trip-reduction/.

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

9d) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

Individual future development projects may be subject to District Rule 4002 if they include demolition, renovation, and removal of existing structures. To protect the public from uncontrolled emissions of asbestos, this rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Any asbestos present must be handled in accordance with established work practice standards and disposal requirements.

Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/.

9e) District Rule 4601 (Architectural Coatings)

Individual future development projects may be subject to District Rule 4601 since they may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

9f) District Regulation VIII (Fugitive PM10 Prohibitions)

Individual future development projects applicant may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the individual future development projects result in at least 1-acre in size, the project applicant shall provide written notification to the District at least 48 hours prior to the project applicants intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the individual future development projects result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project applicant shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

9g) District Rule 4901 - Wood Burning Fireplaces and Heaters

The purpose of this rule is to limit emissions of carbon monoxide and particulate matter from wood burning fireplaces, wood burning heaters, and outdoor wood burning devices. This rule establishes limitations on the installation of new wood burning fireplaces and wood burning heaters. Specifically, at elevations below 3,000 feet in areas with natural gas service, no

person shall install a wood burning fireplace, low mass fireplace, masonry heater, or wood burning heater.

Information about District Rule 4901 can be found online at: https://ww2.valleyair.org/compliance/residential-wood-smoke-reduction-program/

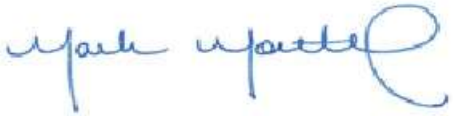
9h) Other District Rules and Regulations

Individual future development projects may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

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.

Sincerely,

Tom Jordan
Director of Policy and Government Affairs



Mark Montelongo
Program Manager

We create special places. We plant, care, inspire.
We are a voice, a teacher, a steward.

July 17, 2024

Sophia Pagoulatos, Planning Manager
Long Range Planning, Planning & Development
City of Fresno
2600 Fresno St
Fresno CA 93721

Subject: South Central Specific Plan EIR Comments

Ms. Pagoulatos:

Tree Fresno has reviewed the Draft South Central Specific Plan and Draft EIR with respect to the role our organization may play in the implementation of the Plan and mitigation of impacts identified in the EIR.

Although the Draft Plan and Draft EIR envision a policy and mitigation responsibility for Tree Fresno, neither document includes a discussion of Tree Fresno, its role in increasing the urban canopy, and the many benefits of trees. We recommend the following discussion be added to both documents:

> Founded in 1985, Tree Fresno is a 501 (c)(3) non-profit organization that has planted over 53,000 trees throughout the central San Joaquin Valley. Trees have been planted by a variety of community partnerships including grants from Cal Fire, the California High-Speed Rail Authority, the California Air Resources Board, the San Joaquin Valley Air Pollution Control District, and many individual donors and volunteers.
>
> Trees provide a multitude of benefits, including shade which can reduce the urban heat island effect. Mature trees increase community aesthetics as well as property values. Trees absorb carbon and sequester it in their leaves, branches, trunks and roots. Trees also facilitate the storage of carbon in soils. Trees improve air quality by absorbing pollutants such as ozone, smoke, dust and other particulate matter. Finally, trees intercept and divert rainfall with their leaves and their roots absorb water, holding the soil and slowing erosion.
>
> Maximizing these benefits requires proper tree selection, placement, planting and maintenance. This is especially pertinent since the majority of our organization's planting work at this time is targeted in South Central Fresno. For example, Tree Fresno has planted five vegetative barriers in Fresno County as part of a California Air Resources Board Supplemental Environmental Project (SEP), called Fresno TREES. The project is designed to reduce pollution from busy roadways.
>
> In Spring 2023, the Valley Air District awarded Tree Fresno $2 million in grants to implement an urban greening project and vegetative barrier project throughout South Central Fresno in what

is known as the AB 617 boundary area. All of the South Central Specific Plan area is included within the larger AB 617 boundary (see p. 17 of the Draft Plan). The greening project is part of California Climate Investments, a statewide initiative that puts Cap-and-Trade dollars to work reducing greenhouse gas, strengthening the economy, and improving public health – particularly in disadvantaged communities. The project will fund 1,200 5-gallon trees for private residents living in the AB 617 Boundary of South Central Fresno. In addition to residential trees, 500 community 15-gallon trees will be planted in public areas, along with even more trees serving as critical components of vegetative barriers.

The Draft Plan contains the following policy references with regard to Tree Fresno.

General Plan Policy (p. 15): D-2-c Highway Beautification. Work with Caltrans, the Fresno Council of Governments, *Tree Fresno,* neighboring jurisdictions, and other organizations to obtain funding for highway beautification programs.

Draft Specific Plan Policy (p. 44): GB-5: Coordinate with *Tree Fresno* on a Community Landscapes Plan. (This policy is repeated in the Draft EIR on p. 3-18 as draft Plan policies, "intended to reduce environmental harm, increase quality of life, and encourage sustainable practices.")

Tree Fresno will continue to have an important role in partnering with the City in planting trees. We request, however, that policies in the Draft Plan and Draft EIR clearly state that Tree Fresno will act as a resource and participate with the City and other stakeholders only as resources allow. As a non-profit entity, Tree Fresno is not in a position to take the lead on policy implementation.

More important is the need for greater discussion of the Urban Forestry Management Plan (adopted by the Council on May 23, 2024). This is understandable given the release of the Draft Plan and Draft EIR on May 31, but both documents should be revised to include important policy issues contained in the UFMP as they affect the plan area and address historical context and controversy (see for example the recommendation from the Attorney General's Office in the 2021 NOP response to improve and maintain vegetation and tree canopy for residents in and around the project area).

The UFMP contains an "aspirational" goal of achieving 20% canopy coverage in the City over the next 40 years. The current canopy coverage is 14.6% overall, but less than 5% in the Specific Plan area. Areas with higher pollution burden and vulnerability have lower tree canopy cover and proportionally more low-income and marginalized community members. A June 2022 City Council resolution committed to plant at least 1,000 trees annually. But to achieve the 20% canopy coverage goal, planting to up to 4,600 trees annually would be needed.

Expanding canopy cover requires a continuing commitment by the City and Tree Fresno can play an important role in support of these objectives. In particular, Section 5-3 of the UFMP (p. 81) contains actions which support this partnership.

Action 1A: Apply for state grants and increase nonprofit and other partnerships to increase funding for tree planting and care establishment.

Action 1B Continue to pursue tree planting opportunities through community volunteer events or collaborating with local organizations to reduce the cost of tree planting.

Action 3B: Achieve a 20% City-wide canopy cover over the next 40 years Prioritize planting throughout Fresno census tracts based on the Priority Planting Score and map to increase canopy cover equitably throughout the City.

Tree Fresno also strongly supports the designation of a City Arborist and City Urban Forester to oversee all urban forest activities in the City. (Action 1I)

Other concerns with the Draft EIR are:

- While the Draft EIR contains a mitigation measure requiring vegetative buffers between truck loading facilities and nearby residents (measure 4.3-3.c on p. 4.3-32), these is no corresponding measure requiring vegetative buffers adjacent to Highways 41 and 99 to reduce air quality impacts to adjacent sensitive uses.
- There is no discussion of Measure P, the City's sales tax initiative for parks and open space, as a funding source for urban greening.

Thank you for the opportunity to comment. If you have any questions or need clarification on our comments, please contact the Tree Fresno office.

Sincerely,

Mona Nyandoro Cummings

Mona N. Cummings, CEO of Tree Fresno

VALLEY IRON INC.
SINCE 1958

Valley Iron Inc.
3114 S. Cherry Ave
Fresno, CA 93706

City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721
Attention: Sophia Pagoulatos, Planning Manager
Telephone: (559) 621-8062
Email: scsp@fresno.gov

Sophia Pagoulatos, Planning Manager,

My name is Noel Briscoe and I am submitting comments on behalf of my family business, Valley Iron Inc. and our related entities - VI Properties and Briscoe Land Development Group LP on the South Central Specific Plan (SCSP) and the related Environmental Impact Report (EIR). I am writing because I am very concerned about the SCSP as currently drafted.

Valley Iron Inc. is a metal distribution company that has been in business in the City of Fresno since 1958. We operated at 2717 S. Cherry Ave from 1958-2005 and have been operating at 3114 S. Cherry Ave. from 2005 to the present day. We sell metal products – steel, stainless steel & aluminum to many industries, including OEM manufacturers, construction companies (commercial & residential), food processing plants and the general public. Many of our customers operate in the City of Fresno. Valley Iron Inc. employees approximately 130 people at the Fresno location and approximately 70% of our employees reside in the City of Fresno. Valley Iron has contributed millions in tax dollars to the City of Fresno over the last 65 years and grown from a small company of less than 10 employees to 130 employees in 2024. Valley Iron Inc. has consistently supported/donated to the following community organizations over the 65 years operating in Fresno:
Fresno State University, State Center Community College District, Fresno Pacific University, Many of the High Schools Robotics Programs, Boys & Girls Club, Big Brother/Big Sisters, Hinds Hospice, Children's Hospital, Terry's House @ Community Regional Medical Center, Fresno Mission/City Center, Catholic Charities, Fresno art Museum, Habitat for Humanity, People's Church, San Joaquin Valley Town Hall, Valley PBS, Youth for Christ, Lighthouse Recovery Center, Poverello House, Building Better Communities and the Fresno Business Council.

My concerns/comments regarding the current draft of the SCSP are as follows:

Downzoning

VALLEY IRON INC.
SINCE 1958

Valley Iron Inc.
3114 S. Cherry Ave
Fresno, CA 93706

Although the SCSP and the SCSP EIR provide a total inventory of existing and proposed land uses and zoning designations under the SCSP, there is nothing in either document that specifically quantifies how many properties would be affected by these land use and zoning changes (or what the total acreage of land use/zoning changes might be).

This is of particular concern because the SCSP contemplates downzoning numerous properties from Heavy Industrial to Light Industrial and other properties from Light Industrial to Business Park or Regional Business Park. This downzoning can have wide-ranging adverse impacts to landowners who are seeking national manufacturing clients to serve the agricultural and constructions industries.

For example, Downzoning from Heavy Industrial to Light Industrial can be extremely problematic for manufactures serving the ag industry. This is because "Animal Food Manufacturing" and "Chemical Manufacturing" are not allowed in the Light industrial zoning district (or any other district in the SCSP, for that matter). These uses are critical to the ag industry, and it makes little sense to artificially limit the locations where manufacturers can engage in these operations, especially given the dearth of Heavy Industrial zoned land in the City.

Downzoning from Light Industrial to Regional Business Park or Business Park is equally troubling. For example, despite the importance of building materials and services uses to the City's construction industry, that use is not permitted in either the Regional Business Park or the Business Park zoning districts. Downzoning from Light Industrial will also result in far more difficult permitting conditions, as most manufacturing (i.e., "General Industrial"), as well as Food and Beverage Processing and Agricultural Processing uses, are allowed in the Light Industrial zoning district, but not in Reginal Business Park or Business Park zoning districts.

The City should be *encouraging* manufacturers and other businesses that serve the agricultural and construction industries, not artificially limiting the land within which they can locate.

Even though the SCSP contemplates changing the zoning of Valley Iron's property, we never received any notice from the City that its property rights were going to be changed. This undoubtedly means numerous other businesses and property owners were likewise not provided notice. It is unfair to property owners to change a landowners' zoning without giving them actual notice. This is especially true given that these changes could disrupt their future plans or result in existing land uses, businesses, or facilities that are inconsistent with the zoning.

Valley Iron Inc.
3114 S. Cherry Ave
Fresno, CA 93706

These proposals also interfere with the investment-backed expectations of persons who have invested in the City over the last 50 years. Equally important, such drastic changes thwart future economic investment because they signal to prospective businesses that the City is an unstable place to invest. Indeed, many manufacturers would think twice about constructing a multi-million dollar facility in a City that actively downzones properties without notifying the underlying landowners.

Valley Iron Inc. operates at 3114 S. Cherry Ave on approximately 23 acres with 250,000 square feet of warehouse and office space. Currently we are zoned Heavy Industrial and we need this designation to stay the same.
We also own approximately 14.5 acres of land directly across Cherry Ave. from Valley iron Inc. This land is in the County, but is included in the SCSP and is slated to be changed to Commercial General, which will not be conducive to our future development. The following parcel numbers make up the property:
329-180-09
329-080-10
329-180-11
329-180-12
329-180-16
329-180-30
329-180-32
329-180-30

Valley Iron Inc. has made significant investments at 3114 S. Cherry since 2005 to develop the property to support our business operation under the Heavy Industrial zoning. The current draft of the SCSP shows our facility being downzoned - we would not have purchased & developed the property had it not been zoned Heavy Industrial. If our current property is downzoned it will negatively impact our ability to further develop our facility to support our future business plans.

Valley Iron Inc. purchased the 14.5 acres on the west side of Cherry Ave. in 2018 with the intent to develop and use it to grow our metal distribution business under the Heavy Industrial Zoning shown in the General Plan. Under the current draft of the SCSP this property would be down zoned to Commercial General, which would not support or allow our future growth plans.

Buffers

The SCSP introduces the concept of "buffers," which restricts or eliminates certain types of developments within the SCSP that are within 1,000 feet of "sensitive uses." According to

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SINCE 1958

Valley Iron Inc.
3114 S. Cherry Ave
Fresno, CA 93706

the City's maps, these buffers cover nearly half of the entire SCSP area. The City should decline to incorporate buffers into the SCSP.

We are very concerned about the buffer concept. The buffers would prohibit certain warehousing and distribution uses (chemical and mineral storage; freight/truck terminals), and convert other uses ("Limited Industrial" and most warehouse and distribution uses) to conditional uses. In addition Health Risk Assessments must be prepared for any and all industrial processes, construction, and operations, regardless of the intensity of the land use or the likelihood of adverse health impacts. (SCSP EIR, Mitigation Measures 4.3-3a, 4.3-3b, 4.3-3c.)

All land uses within the buffer must also "meet CARB criteria for zero or near zero emissions facilities," imposing a significant burden on local businesses, without actually describing or alerting the public what that actually means.

We are also concerned about the size of the proposed buffers. If buffers are incorporated, they should be the exception, not the rule. According to the maps, however, the proposed buffers would take up nearly half the space of the SCSP. Moreover, the buffers appear to have been artificially inflated because the SCSP contemplates changing the zoning of numerous properties from Light Industrial to Residential (simply due to the presence of an isolated house). For example, an entire buffer area has been created in the center of the industrial triangle due to 1-2 isolated residences on Annadale Avenue. It is unclear how the City could spot zone a small number of isolated parcels to residential and then use that rezoning to impose restrictions on a much larger group of landowners.

We are also unaware of any city or county near Fresno that has adopted 1,000-foot buffers. Because there is significant demand for industrial development in the City, and few places in the City to actually build, the adoption of buffers would simply mean that new industrial developments—and the jobs they create—go to other nearby municipalities. As a longtime Fresno business, we cannot support any policy that would undermine the success of Fresno as an industrial hub or that would incentivize our workforce to move elsewhere.

The buffers proposed in the current draft of the SCSP would have a negative impact on Valley Iron's operation and future growth. There are 6 residential houses directly across the street (west) from Valley Iron, 2 of which we already own and could demolish once the tenants have been properly vacated. The other 4 houses could be purchased by us and be demolished, so the residences that might impact us could go away and neutralize the buffering requirement. Other businesses in the SCSP may not have the ability to remove the residences around them, but they should not be affected by a buffer. The City of Fresno allowed all the businesses in the SCSP to start up and grow with the residences in place - changing the rules now is not acceptable.

There is also a religious Sikh temple on the corner of North & Cherry Ave. that could potentially impact Valley Iron Inc because of the potential buffering. The City of Fresno has approved the Sikh temple to expand their facility several times over the last couple decades knowing that the temple is surrounded by Heavy Industrial businesses. To now penalize the neighboring businesses for the temple's location is just wrong. The temple chose their location, Valley Iron and other businesses chose their location – the City approved ALL (businesses & the Temple) of the facilities, operations and growth projects, therefore the current draft of the SCSP regarding a buffer around the Temple to the north of Valley Iron is unjust and should not be allowed. Changing the rules after development has been completed is unacceptable.

Improvements/Mitigation that May Be Practically Infeasible.

Solar Infrastructure:

- Buildings over 400,000 square feet must "ensure rooftop solar panels are installed and operated in such a manner that they will supply 100% of the power needed to operate [the non-refrigerated] portions of the facility including the parking areas." (SCSP at 75.)
    - All other buildings shall have solar-ready roofs, "which includes designing and constructing buildings in a manner that facilitates and optimizes the installation of a rooftop solar photovoltaic (PV) system at some point after the building has been constructed." (SCSP at 75.)
    - All other buildings must "demonstrate their capacity to include energy production and storage features on-site, including" on-site solar panels. The amount of renewable energy needed is based on the needs of the development, serving at a minimum 50% of the energy demand. (SCSP EIR, Mitigation Measure 4.6-1d.)

This part of the current draft of the SCSP is complete overreach – Adding solar equipment to a facility/project is strictly the developer's choice, not something that should be mandated by the City of Fresno. Valley Iron has solar equipment on top of it's warehouses because we analyzed it and it made financial sense for us to install. The City of Fresno has

no business mandating solar equipment for commercial development as solar does not always make financial sense to a business.

Required Transition to Zero Emissions Trucks:

- All future tenants of new and redeveloped commercial and industrial land uses must ensure all Class 7 and 8 trucks are "model year 2014 or later . . . ." After December 31, 2026, all trucks must be transitioned to "zero-emission vehicles," subject to the Planning Director's discretion. (SCSP EIR, Mitigation Measure 4.2-1h.) The developer or the business is also responsible for ensuring "that adequate electrical infrastructure is provided to allow for the transition to electric heavy-duty trucks." (*Id.*)

- This is far more aggressive than CARB's Advanced Clean Fleets ("ACF") regulation, which allows high-priority fleets to purchase at least some trucks other ZEVs until 2035.

- Moreover, unlike the ACF regulation, which only applies to some fleets, the City's Mitigation Measure applies to ***all*** discretionary permits for commercial and industrial land uses within the SCSP.

- The City requires an equally aggressive phase-in schedule (more aggressive than CARB's ACF regulation) for Class 2-6 Trucks, requiring full electrification of the fleet by December 31, 2031. (SCSP EIR, Mitigation Measure 4.3-1i.)

  This part of the current draft of the SCSP is complete overreach. This type of regulation is already handled by CARB – The City of Fresno has no business getting involved in this type of regulation and attempting to adopt stricter regulation than what the State of California is mandating.

Promotion of Passenger EVs for Customers/Employees:

- "At least 10% of all passenger vehicle parking spaces shall be electric vehicle (EV) ready," and at "least 5% of all passenger vehicle parking shall be equipped with working Level 2 Quick charge EV charging stations installed and operational, prior to building occupancy," regardless of employee or customer demand for such spaces. (SCSP at 75.)

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This part of the current draft of the SCSP is overreach. The % of EV parking is way too aggressive and will drive cost up significantly on the developer. Technology is changing quickly and it is not The City of Fresno's place to mandate EV charging stations for private businesses – what if Hydrogen turns out to be the fuel of the future and we have millions of dollars of EV charging stations going unused?

Zero Emissions Equipment:

- "On-site motorized operational equipment shall be ZE (zero emission)." (SCSP at 75.)

Again – SCSP draft overreach. This is CARB's decision, NOT the City of Fresno.

Construction Fleets/Equipment/Materials:

- All "construction contractors shall demonstrate that they shall use the cleanest available fleet of heavy-duty equipment" after submitting "Construction Clean Fleet" paperwork to the San Joaquin Valley Air Pollution Control District. And "[a]ll on-site yard trucks and forklift shall be powered by electricity." (SCSP EIR, Mitigation Measure 4.3-1B.)

- The SCSP requires an applicant to "deploy the highest rated CARB Tier Technology that is available at the time of construction," subject to discretionary waivers by the Planning Director. (SCSP at 76.)

- The required use of "electric-powered hand tools, forklifts, and pressure washers." (SCSP at 76.)

- Prohibition of diesel-powered generators for construction. (SCSP at 76.)

- Required to use at least 20% locally sources or recycled materials for construction materials, and wood products used should be certified through a sustained forestry program. (SCSP EIR, Mitigation Measure 4.8-1b.)

ALL the above is overreach as currently drafted in the SCSP. CARB/State of CA & SJVAPCD already regulates all the trucks, powered equipment and tools, etc.
The City of Fresno has no business attempting to enforce stricter regulation than the State level.
The last bullet point regarding sourcing of materials and sustainability would create added cost and more unnecessary paperwork to prove sourcing and sustainability. The

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State of CA already has programs in place to govern construction materials depending on public vs private nature of the project.

Other Infrastructure Improvements:

- Unless a property owner records a covenant stating the property prohibiting refrigerated warehouse space, "a conduit shall be installed during construction of the building shell from the electrical room to 100% of the loading dock doors that have the potential to serve refrigerated space." In addition, all dock doors serving TRU units must include "electric plug-in units." (SCSP at 75.)

- The construction of a secondary electrical room (or sizing one electrical room 25% larger than required) to accommodate additional electrical panels. (SCSP at 76.)

- For all industrial land uses that do not use natural gas as part of a manufacturing process, "no natural gas infrastructure shall be permitted." (SCSP EIR, Mitigation Measure 4.3-1k.)

This is overreach as currently drafted in the SCSP. The City of Fresno has no business mandating the scope of the electrical plans and or the use of natural gas for every new building being constructed. The owners/developers/engineers & architects design the building for their intended use – NOT The City of Fresno.

Further Studies:

- Business owners and/or their consultants must perform noise studies for any new development, regardless of how close they are to sensitive receptors. (SCSP EIR, Mitigation Measure 4.12-2a.)

This part of the current draft of the SCSP is unnecessary. If there is no sensitive receptor near the project, the City of Fresno is simply mandating the developer to waste money on a noise study that is not going to result in any mitigation needs.

The current draft of the SCSP should be scrapped and completely reworked. My family has built Valley Iron Inc into one of the largest metal distributors in California over many decades and we have invested heavily in the City of Fresno. We pay our taxes, we have increased the number of jobs we provide, and we give back to the community in many, many ways throughout every year. The SCSP as drafted would have a negative impact on our ability to continue to operate and grow our business in the City of Fresno.

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The City of Fresno must create and implement a version of the SCSP that firmly supports existing businesses, as well as attracts new businesses. As currently drafted, the SCSP is full of overreach and will penalize many of the existing businesses that have been investing in Fresno for decades and it will certainly make the City of Fresno very unattractive to new investors/developers. There are several other Cities along the 99 corridor that are competing for new business, and they are not implementing plans like the current draft of the SCSP.

Thank you for your consideration,

Noel Briscoe
President & CEO
Valley Iron Inc

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July 30, 2024

VIA EMAIL [scsp@fresno.gov] & UNITED STATES MAIL

Sophia Pagoulatos, Planning Manager
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Re: Comments on South Central Specific Plan

Dear Ms. Pagoulatos:

Thank you for providing the opportunity to submit comments on the City of Fresno's (the "City") Draft South Central Specific Plan (the "SCSP") and the related Draft Environmental Impact Deport (the "DEIR"). As you are aware, my law firm represents numerous businesses and landowners located within the boundaries of the South Central Specific Plan (the "SCSP").

In short, the SCSP and the DEIR would downzone numerous industrial properties—even though the SCSP area has been an industrial reserve for over a century;[1] impose onerous, infeasible, and unusual requirements on property owners and tenants unlike those of any other city in the Central Valley; effectuate impermissible spot zoning by rezoning isolated properties to residential districts; create restrictive 1,000-foot buffers from sensitive receptors that

[1] SCSP, 2 ["Beginning as early as 1918, the City of Fresno has recognized the area's economic importance and from 1956 onward has planned for industrial development through several iterations of the Fresno General Plan . . . ."].)

would apply to roughly half the properties within the SCSP; and continue the practice of reducing and eliminating employment-generating industrial zoning across the City.

Due to its central location and proximity to transportation corridors, the City has long been the preferred destination in the Central Valley for economic investment. Over the past several years, however, developers, investors, and national tenants have instead chosen other communities—primarily the City of Visalia, the City of Madera, and the County of Tulare. As explained in the accompanying expert report prepared by Ethan H. Smith of Newmark, this shift has largely been driven by the perception of the City as an exceptionally challenging permitting and business environment. (See generally Attachment A.)

The SCSP will only reinforce these trends, and it should not be adopted as currently envisioned. The City should instead seek to build consensus with its job creators. The City should reach out to landowners to determine whether they want their properties downzoned. The City should meaningfully engage with industry regarding feasible mitigation measures. And it certainly should not consider policies or practices that will drive jobs and investment away from the City.

A. The City Should Not Downzone Properties Without Notice to, or Approval of, Affected Landowners and Businesses

For over a century, the area within the SCSP ("Plan Area") has been designated primarily for industrial land uses, reflecting sound planning principles. The area is adjacent to transportation corridors and is located on the southmost, sparsely populated periphery of the City. The residents within the Plan Area "are located primarily in pockets of development along the outer edges of the area." (DEIR, 5-12.) This longstanding vision of the Plan Area as an industrial reserve has allowed it to thrive as the City's primary economic engine.[2] While it comprises less than 7.5% of land in the City, and includes only 0.34% of the City's population, it contributes roughly 21% of the City's tax revenue: $102.7 million annually. The area's 440 businesses, representing 124 different sectors of the economy, account for approximately 25% of the City's jobs and more than $13 billion in annual economic activity.

Despite this, one of the primary planned consequences of the SCSP is to downzone properties away from heavy and light industrial land uses. These efforts are especially prevalent in the undeveloped eastern, western, and southern peripheries of the SCSP—exactly where new development would occur. (See SCSP, Figures 4-3, 4-7.) The City should not limit potential uses in exactly those areas where development is likely to occur.

In addition to the adverse consequences for economic development, the City should also decline to authorize any rezones in the SCSP because the City declined to provide affected landowners with notice that the zoning of their properties would be changing. It is unclear why this did not occur. I frequently attend City Council, Planning Commission, and Project Review Committee meetings. At virtually every one of those meetings, the elected and appointed

[2] https://www.investfresnoca.com/economicimpact

representatives of the City stress the importance of early and persistent outreach by both the City and project applicants to the community. Here, however, although the SCSP contemplates the rezoning of numerous properties within the Plan Area, I am unaware of a single affected landowner or business that received notice directly from the City regarding the publication of the draft SCSP, the circulation of the DEIR, or the public comment period on the DEIR—much less a communicating stating their underlying zoning and land use designation would change.

Landowners should not be required to hire a land use specialist, such as an attorney, to learn about a potential action that could directly affect their property. The City should instead directly advise landowners that their zoning will change. And this notice should not simply be a one-page document providing notice of a plan amendment. Rather, since most lay people are not familiar with technical planning principles, or understand that such a plan amendment could affect their property rights, the City should instead directly advise landowners and businesses—in plain language that a lay person can understand—that the City's actions would impact their zoning.

Direct notice in plain language is critically important. Downzoning can have a devastating impact on landowners and employers whose properties are rendered inconsistent with the underlying zoning. (Attachment A, p. 4.) Downzoning diminishes the ability to attract the reputable, responsible, and well-capitalized businesses. (*Id*.) It can likewise result in an event of default on existing loans. (*Id*.) Moreover, rezoning that results in non-conformities makes it nearly impossible to receive conventional financing (including capital improvements necessary for ongoing maintenance, beautification, and clean energy improvements). (*Id*.) And it is far more difficult to sell properties with legal non-conforming uses.) (*Id*.)

Although the Legal Non-Conforming Use provisions of the City's Development Code provide some limited protections for legal non-conforming uses, those protections are exceptionally limited for industrial landowners. For example, if an industrial legal non-conforming use ceases for more than 90 days, the use is no longer legal. This is insufficient for a landowner to change tenants even under the best of circumstances; during an economic downturn, however, it virtually ensures the legal non-conforming status will be lost. (See City of Fresno, Development Code, § 15-404(F)(2); Attachment A, p. 4.) Similarly, a landowner cannot change from one legal non-conforming use to another (such as converting manufacturing space to warehouse space). (See *id*. at § 15-404(D).) Further, enlargement of a legal non-conforming use can only occur subject to a conditional use permit ("CUP"), which eliminates the ability to attract reputable, national, industrial tenants and further diminishes the ability to re-let industrial properties. (See *id*. at § 15-404(B); Attachment A, p. 4.)

This issue is not limited to developed properties or nonconformities. Landowners acquire land with an investment-backed expectation based largely on the property's zoning. By eliminating potential uses, or changing the possible uses, for a property, or making certain uses subject to a CUP, rezoning property carries a strong likelihood of interfering with landowners' investment-backed expectations, especially when the rezone is against their will. (See Attachment A, p. 4.) Further, by changing the zoning of a property without landowner/business approval, the City sends the message to all those seeking to invest in Fresno that the City's zoning process is

unstable and their investments are not safe. (*Id.*) Because California's unemployment rate is among the highest in the nation,[3] and the County of Fresno's rate is among the highest in California,[4] the City should be encouraging—not discouraging—investment and job creation.

B. Because the City Has Been Eliminating Light and Heavy Industrial Zoning Across the City, Very Little Land Remains Available for Industrial Development

Over the past several years, the City has been gradually eliminating industrial zoning districts throughout the City and its planning area. For example, the 2017 Southwest Specific Plan ("SWSP") eliminated all industrially-zoned property from the plan area.[5] The Central South Area Specific Plan ("CSASP") likewise does not include any properties zoned industrial within the relevant plan area.[6] The West Area Neighborhoods Specific Plan land use map shows less than five small properties—all adjacent to S.R. 99 and containing existing development—as zoned light industrial, with no heavy industrial zoning.[7] The Southeast Development Area Specific Plan includes no proposed industrially-zoned properties.[8] And aside from a small handful of properties along the S.R. 180 corridor in West Fresno, along Golden State Boulevard in Northwest Fresno, and within the Palm Bluffs area, there are no undeveloped industrial-zoned properties elsewhere in the City. There is currently little room for industrial growth or expansion within the City's jurisdictional boundaries. The only land available for industrial development is within the SCSP. Yet the SCSP now contemplates downzoning most undeveloped land within the Plan Area. The dearth of land available for heavy and light industrial development in the City will not only reduce economic investment in the City, it will steer economic investment elsewhere. (See Attachment A, pp. 4–8.)

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3 https://apnews.com/article/california-highest-unemployment-slower-job-growth-b1e4c822b33f29f819dbb024103cc843

4 https://edd.ca.gov/en/about_edd/news_releases_and_announcements/unemployment-may-2024/

5 https://opr.ca.gov/docs/20200624-Southwest_Fresno_Plan-case-study.pdf ["Key outcomes of the SWSP development process include a new zoning map that prohibits further industrial development in the community"].

6 https://www.fresno.gov/wp-content/uploads/2023/03/Fresno_Central_Southeast_Area_Subsequent_MND_signed.pdf

7 https://www.fresno.gov/wp-content/uploads/2023/05/2023-Planned-Land-Use-Map.pdf

8 https://www.fresno.gov/darm/wp-content/uploads/sites/10/2022/03/SEDA-Landuse-Map.pdf

C. Further Assessment of the SCSP's Impacts on Local Businesses is Required

1. The City's Market Demand Assumptions Are Not Supported by Substantial Evidence

The City retained Economic & Planning Systems, Inc. ("EPS") to prepare a nonresidential real estate market analysis (the "Market Analysis") to support planning efforts and environmental review. (DEIR, Appx. A, p. 1.) The Market Analysis was intended to "provide context for the EIR related to the scale and type of land uses that can be supported through the study horizon (2040)," thereby "ensuring that development totals allow for appropriate environmental analysis and mitigation measures, as necessary," and to "inform land use regulations" so that the Project could "develop according to the vision described in the Specific Plan while aligned with market demand." (*Id*. at 2.) The Market Analysis relied on projected employment growth and long-term historical growth of non-residential development to estimate development demand over the planning horizon, (*id*. at 35), assuming that "foundational market conditions fall within normal parameters" during that time. (*Id*. at 38 fn. 41.) Based on this methodology, the Market Analysis estimated "demand for approximately 350 acres (about 6.0 million square feet of new [nonresidential] development) through 2040" within the Plan Area. (*Id*. at 45.)

In reaching this conclusion, the Market Analysis acknowledged that development in the Project Area would be "heavily influenced" by "individual landowner decisions and investor objectives" and therefore "there is every possibility that the specific actions of one or more development interests may contribute to outcomes that vary from the land use demand estimates in th[e] [Market] Analysis." (*Id*. at 35.) To account for this uncertainty, EPS recommended application of a 30% contingency factor to the base non-residential demand estimate, finding this "would be appropriate to allow for a conservative evaluation of environmental impacts and identification of mitigation measures." (*Id*.) This resulted in estimated non-residential development demand in the Project Area "for about 456 acres (about 7.8 million square feet of new development) through 2040." (*Id*. at 45.) The City, however, declined to use this figure, and instead directed its environmental consultant "to recalibrate a target buildout to reflect ***twice*** the market demand estimated by EPS in order to capture the level of demand the City anticipates could happen with the adoption of this Plan." (SCSP, p. 10 [emphasis added].) Nor did the City take into consideration the challenging permitting conditions industrial applicants face in the City.

There is no substantial evidence to support the City's assumed market demand. It is important that the estimate be correct. If too high, it could overstate the potential environmental effects of the SCSP, resulting in unnecessary mitigation without a nexus or substantial relation to any environmental impact. (See DEIR, Appx. A, p. 45 ["EPS recommends a 30 percent contingency factor would be appropriate to allow for a conservative evaluation of environmental impacts and identification of mitigation measures."].) If too low, it could understate the environmental and economic consequences of employment generating land uses moving outside the City, as explained below. Under any circumstance, the City should endeavor to use a figure

for market demand that is supported by the evidence. Because that did not occur, the DEIR is flawed. (See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1197 ["[An] EIR must contain facts and analysis, not just the bare conclusions of the agency."].)

2. The SCSP if Adopted Will Frustrate the City's Ability to Capture Market Demand

Although the City has long been the preferred destination in the Central Valley for investment in new industrial land uses, the last several years have seen the City's industrial inventory stagnate and the inventories in other nearby cities skyrocket. According to the Market Analysis, the inventory of industrial space in the Plan Area has remained static since 2018. (See DEIR, Appx. A, p. 28, Table 9; see also DEIR, p. 4-2 ["conditions in the Plan Area have not changed substantially since" the NOP was circulated in 2019].) This is not due to a lack of demand; to the contrary, the vacancy rate for industrial properties has been less than 5% since 2018, and it was only 1% in 2021. (See *id*.) It is likewise not due to a dearth of land zoned for industrial uses; rather, Figure 4-3 in the SCSP shows a large number of undeveloped properties within the City zoned industrial.

The simple truth is the City is a difficult permitting environment for employment-generating land uses. (See Attachment A, pp. 5–6.) The Market Analysis directly acknowledges the causal connection between land use policies and demand absorption, finding the City's "policies and strategies also affect the types of industries that locate in the City and the real estate they demand." (DEIR, Appx. A, p. 22.) The Market Study likewise finds "land demand estimates" are "informed by land use regulations that support desired development," as well as "streamlined permitting requirements, the availability of 'shovel-ready' land, and, in the case of large-scale office and industrial users, an interest among corporate decision makers in the area to locate in the Project (as opposed to the competitive markets discussed previously) . . . ." (*Id*. at 35.)

Both internal and external issues unique to the City directly affect its ability to absorb demand for industrial uses. For example, there is little to no "shovel-ready" land in the City, as the City characterizes virtually any development permit as "discretionary" and thus subject to both CEQA and appeal to the City Council. (See Fresno Municipal Code, §§ 15-5206, 15-5207, 15-5208.) Even for land uses that are technically "permitted," those land uses are not "by right." (See *id*. at § 15-5207.) This attracts project opponents, and this requires industrial applicants to be overly conservative with respect to their choice of environmental documents. The result has been that, over the past decade, most industrial projects within the City result in the preparation of an environmental impact report.[9]

[9] See https://ceqanet.opr.ca.gov/Search?StartRange=2014-07-18&EndRange=2024-07-18&LeadAgency=Fresno%2c+City+of&City=Fresno&DevelopmentType=Industrial; see also https://fresnochamber.com/news/unraveling-fresnos-industrial-development-from-warm-welcome-to-present-challenges-economic-growth-expansion-businesses-operational-

Further, the California Attorney General's office has appointed counsel to oversee the City's land use decisions, objected to ***existing*** industrial developments,[10] and hired local advocates who previously objected to industrial development in the City.[11] Since 2018, virtually any land use decision perceived as furthering the interests of industrial development has attracted litigation by a wide range of interests.[12] And the City has recently made zoning decisions to convert new industrial developments into legal nonconforming uses.[13]

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comparative-advantages-fresno-fresnocounty/ [observing that "[f]rom the early 2000s to the mid-2010s, developers encountered no problem in obtaining city approval for building projects in areas appropriately zoned to accommodate spaces for light to heavy industrial"].)

[10] https://oag.ca.gov/system/files/media/2022-10-12-ago-ltr-southwest-fresno-rezone-project.pdf

[11] https://gvwire.com/2024/02/07/leading-fresno-environmental-justice-attorney-joins-state-ags-office/

[12] The following links provide just a handful of examples:

https://leadershipcounsel.org/south-fresno-residents-take-historic-action-against-caltrans-and-federal-highway-administration-over-toxic-highway-interchange-expansions/

https://www.fresnobee.com/news/local/article203120414.html

https://sjvsun.com/news/fresno/100mil-southwest-fresno-warehouse-development-faces-environmental-lawsuit/

https://fresnochamber.com/news/industrial-zoning-dispute-continues-for-some-elm-avenue-properties/

https://fresnoland.org/2022/10/13/city-council-approves-location-of-busseto-food-plant-in-southwest-fresno/

https://leadershipcounsel.org/wp-content/uploads/2021/11/Verified-Petition-Complaint_South-Fresno-Community-Alliance-v.-City-of-Fresno.pdf

https://leadershipcounsel.org/wp-content/uploads/2022/06/MC3-Draft-Plans-Comment-Letter-1.pdf

https://leadershipcounsel.org/city-of-fresno-remove-light-industrial-zoning-in-the-proposed-plan-amendment/

https://leadershipcounsel.org/press-release-south-fresno-residents-fight-back-against-warehouse-development-secure-protections/?utm_source=rss&utm_medium=rss&utm_campaign=press-release-south-fresno-residents-fight-back-against-warehouse-development-secure-protections

[13] https://thebusinessjournal.com/southwest-fresno-industrial-rezone-project-pushed-back/

The City's competitors have directly benefitted from the City's inability to entitle additional industrial projects—all of whom have enjoyed rapid growth in available industrial space since 2018. (See, e.g., DEIR, Appx. A, p. 30 ["Since 2018, development in the area [of the Visalia Industrial Park] has intensified rapidly, with several developments each containing more than 1 million square feet currently under construction or seeking planning entitlements, largely consisting of logistics and distribution hubs for national firms such as Amazon and UPS."]; *id.* ["As of May 2022, existing industrial buildings in the [Madera Industrial District] area contained approximately 2.5 million square feet of floor area."]; Attachment B [finding "tenant and buyer demand has slowed" in Fresno whereas Visalia has become "the development capital of Central California" with "fi[ve] consecutive year[s] of over 1 million square feet of commercial space constructed, most of it industrial" and "Madera County's industrial momentum remains positive"].)[14] As the Market Analysis explains:

> Within approximately 30 miles or less of the SCSP area, there is at least 27.4 million square feet of industrial development, with an estimated 49.6 million square feet of industrial development capacity in these areas. Including developments over 30 miles from the SCSP along SR-99, there is at least 43.5 million square feet of existing industrial development with capacity for 103.9 [million] further square feet. With [one] exception . . . , all of these developments are within close proximity to SR-99, and all allow a variety of office and industrial uses, enabling them to compete with the SCSP for a wide variety of business, including manufacturing, warehousing, and logistics and distribution centers.

(DEIR, Appx. A, p. 27.)

In the comment period on the Notice of Preparation for the DEIR, the City received comments demonstrating that, to be an adequate document, the DEIR should evaluate the potential impacts associated with industrial businesses locating outside the City.[15] Despite (i) having received these comments, (ii) the Market Study's acknowledgement that the City's ability to absorb demand is directly affected by adverse permitting conditions, and (iii) the fact that the City's industrial inventory has stagnated during a time of one percent vacancy rates while other

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https://gvwire.com/2023/06/01/fresno-companies-say-theyve-been-left-out-of-citys-rezoning-discussions/

[14] See also https://fresnochamber.com/news/unraveling-fresnos-industrial-development-from-warm-welcome-to-present-challenges-economic-growth-expansion-businesses-operational-comparative-advantages-fresno-fresnocounty/ [stating that "recent opportunities that could have greatly benefited Fresno's economy instead found their way to the cities of Madera and Visalia"].

[15] https://www.fresno.gov/wp-content/uploads/2023/03/Comments-Received-SCSP-EIR-Scoping-Period-20210324-20210514.pdf

cities have admittedly captured that demand, neither the DEIR nor the Market Study endeavor to assess the likelihood that the City's competitors will continue to capture that demand.

This is of significant concern because the SCSP and the DEIR interfere with the investment-backed expectations of industrial landowners and businesses, and seek to impose unusual and infeasible requirements on industrial land uses that are far more onerous than those applied by the City's competitors, as shown below:

SCSP & DEIR Requirements	City of Madera	City of Visalia	County of Tulare
The SCSP contemplates the downzoning of properties from IH/IL to more restrictive zoning districts. (SCSP, Figure 4-7.)	N/A	N/A	N/A
The SCSP contemplates the creation of buffers for approximately half the plan area that would restrict certain land uses, and make others subject to CUPs. (SCSP, Figure 5-2; see also Attachment C	No buffers; just 10 foot setbacks	No buffers; just 10 to 20 foot setbacks and 7 to 8 foot solid wall for industrial properties adjoining residential uses	No buffers; just 5 to 20 foot setbacks and six foot solid wall for industrial properties adjoining residential uses
In buffer areas, compliance with CARB "zero or near zero emission facility" requirements in the California Sustainable Freight Action Plan	N/A	N/A	N/A
Buildings over 400,000 square feet must have a truck operator lounge with amenities. (SCSP, Policy (m).)	N/A	N/A	N/A
Building over 400,000 square feet must install rooftop solar sufficient top power 100% of the non-refrigerated areas of the facility, including parking areas. (SCSP Policy (q). For other buildings, inclusion of on-site clean energy commensurate	N/A	N/A	N/A

with at least 50% of the demand needed for future development. (DEIR, Mitigation Measure ("MM") 4.6-1d.)			
All motorized operational equipment must be zero emissions. (SCSP, Policy (n).)	N/A	N/A	N/A
All rooftops must be designed to be capable of accommodating rooftop solar. (SCSP, Policy (o).)	N/A	N/A	N/A
Cool/Low VOC surfaces are required for new construction. (SCSP, Policies (u), (w).)	N/A	N/A	N/A
Construction of redundant warehouse electrical rooms. (SCSP, Policy (v).)	N/A	N/A	N/A
Requires highest available CARB tier technology for construction equipment. (SCSP, Policy (y).) Requirement to use cleanest available construction equipment. (DEIR, MM 4.3-1b.)	N/A	N/A	N/A
Obligation to reduce emissions through Voluntary Emissions Reduction Agreements (VERAs) with the SJVAPCD. (DEIR, MM 4.3-1a.)	N/A	N/A	N/A
Class 7-8 vehicles domiciled on property must be fully electrified by December 31, 2026. (DEIR, MM 4.3-1h.) Infrastructure to support ZEVs must also be installed. (*Id*.)	N/A	N/A	N/A

Landowners must begin to convert Class 2-6 vehicles domiciled on property to ZEVs at the start of operations, and transition the entire fleet to ZEVs by December 31, 2031. (DEIR, MM 4.3-1i.)	N/A	N/A	N/A
Prohibition of natural gas except for processing. (DEIR, MM 4.3-1k.)	N/A	N/A	N/A
Mandatory Health Risk Assessments within buffer areas. (DEIR, MM 4.3-3a, 3b.) Prohibition of loading/unloading within 1,000 feet of sensitive receptors, depending on the results of the HRA. (DEIR, MM 4.3-1c.)	N/A	N/A	N/A
Mandated use of low-carbon concrete. (DEIR, MM 4.8-1a.)	N/A	N/A	N/A
Mandated use of locally sources or recycled construction materials. (DEIR, MM 4.8-1b.)	N/A	N/A	N/A
Site characterization, investigation, and remediation as a condition of development. (DEIR, MM 4.9-1d, 1e, 1i.)	N/A	N/A	N/A
Mandatory noise studies, regardless of likelihood of potential impacts. (DEIR, MM 4.12-2a.)	N/A	N/A	N/A

Individually and cumulatively, these measures will continue the outward drift of businesses and jobs to other communities. From a policy perspective, the City should not allow this to occur. At the very least, however, the DEIR must assess the impacts associated with the City's market demand being captured by other nearby cities so that decision makers can make an informed decision regarding the tradeoffs inherent in the proposed project.

3. The DEIR Fails to Assess the Environmental Consequences of Other Cities Capturing the City's Market Demand

"The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." (*Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 937; see Pub. Res. Code, §§ 21061, 21002.1(a).) Thus, "CEQA procedures 'are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.'" (*Id*. [quoting Pub. Res. Code, § 21002]; see also CEQA Guidelines, §§ 15126.4, 15126.6, 15131(c).)

The downzoning of numerous properties and the imposition of infeasible requirements far more onerous than those of the City's competitors makes it highly likely that other local communities will not only continue to capture the demand for industrial development within the Central Valley but do so at an increasing rate. (See Attachment A, pp. 5–8.) This would not only have permanent and severe economic consequences, it would also have serious environmental consequences. For instance:

Vehicle Miles Traveled. The Market Study concludes that the "City is projected to add up to 216,000 residents and nearly 70,000 employees by 2040," and that the demand for industrial land uses in the Plan Area would account for over 10% of those jobs: approximately 7,100 additional jobs. (DEIR, Appx. A, pp. 4–5.)[16] If the City remains unable to entitle industrial projects and does not increase its available inventory of industrial space—which is reasonably foreseeable, and highly likely, given the SCSP plans to make development even more difficult than it already is—***those jobs will go elsewhere***. (See Attachment A, pp. 3–8.) That means City residents who would have otherwise enjoyed a short commute to South Central Fresno would instead be required to drive an additional 30 miles each way to Madera, Visalia, or Goshen. This

[16] Notably, the projected population growth assumed in the Market Analysis and DEIR is inconsistent with positions the City has previously taken on this issue. (See https://gvwire.com/2024/01/29/is-fresno-done-growing-mayor-dyer-calls-for-halt-to-city-support-of-southeast-expansion/ [reporting that City officials put approval of Southeast Development Area Plan on hold, citing "lagging population forecasts [that] don't justify the outward growth"]; see also

https://www.fresnobee.com/opinion/readers-opinion/article287210260.html;

https://www.fresnobee.com/opinion/readers-opinion/article284875172.html.)

would result in an additional 426,000 daily vehicle miles traveled and, assuming 260 work days/year, ***over 110 million additional vehicle miles traveled annually***. Despite this, there is no analysis of this potential impact in the DEIR.

Air Quality/Greenhouse Gas Impacts. Employees being required to travel daily from Fresno to communities such as Madera, Visalia, and Goshen for work would likewise increase criteria pollutant emissions and greenhouse gas emissions. Despite this, there is no analysis of the impacts associated with Fresno residents being required to drive to these locations.

Agricultural and Forestry Resources. Impact 4.2-1 concludes that development within the Plan Area would "likely . . . result in conversion of existing Prime Farmland and Farmland of Statewide Importance to non-agricultural uses" and that this would result in a significant impact. (DEIR, 4.2-7.) While there are some agricultural uses in the Plan Area, many of the undeveloped properties are not active farms. This is in contrast to the land available for industrial development by the City's competitors—virtually all of which are comprised of existing agricultural uses. In other words, by driving industrial development elsewhere, the City will actually ***increase*** the conversion of farmland at a regional and particularly a cumulative level. Despite this, there is no analysis of this potential impact in the DEIR.[17]

4. The SCSP Does Not Meet the Project Objectives and the Project Description is Inadequate

"Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal and weigh other alternatives in the balance." (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 332.) Thus, "[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185; see *Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1173 [same].) "A project description that gives conflicting signals to decision makers and the public about the nature of the project is fundamentally inadequate and misleading." (*South of Market, supra*, 33 Cal.App.5th at 321.) Similarly, "[a] curtailed, enigmatic or unstable project decription draws a red herring across the path of public input." (*County of Inyo, supra*, 71 Cal.App.3d at 198.) A project description must include, among other things, "a statement of the objectives sought by the proposed project." (*Id.*; see CEQA Guidelines, § 15124, subds. (b), (c).) A clear statement of objectives is crucial to "develop a reasonable range of alternatives" and to "aid the decision makers in preparing findings or a statement of overriding

[17] The fact that some of the requirements that would continue the outward migration of industry is "mitigation" identified in the DEIR is immaterial. CEQA requires the discussion and evaluation of potentially significant environmental effects caused by mitigation measures themselves. (CEQA Guidelines, § 15126.4(a)(1)(D); *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986.)

considerations." (CEQA Guidelines, § 15124(b); see also *id*. at §§ 15126.6(a), 15021(d); Pub. Res. Code, § 21081.)

The DEIR includes several Project Objectives, most of which concern the stimulation of economic development and the creation of jobs. (See DEIR, pp. 2-1–2-2 [objectives include to "[s]timulate economic development . . . [by] attract[ing] development," to "provide diverse employment," to "[p]reserve the viability of existing industrial and manufacturing operations in the Plan Area," and to "improve Plan Area infrastructure . . . [by] expand[ing] the supply of 'shovel-ready' sites"].) The SCSP, however, does not meet the Project Objectives for the following reasons:

- Because the SCSP and the DEIR impose requirements that are far more drastic and unlike any requirements adopted by any local governments that compete with the City for industrial development, substantial evidence does not support the conclusion that the SCSP would stimulate economic development. In fact, the SCSP would continue and exacerbate existing low vacancy rates and stagnated industrial development.

- Because the SCSP and the DEIR impose requirements that are far more drastic and unlike any requirements adopted by any local governments that compete with the City for industrial development, substantial evidence does not support the conclusion that the SCSP would provide diverse employment opportunities for local workers.

- Because the SCSP and the DEIR will drive business to nearby communities, and the ZEV mandate will create its own environmental impacts, substantial evidence does not support the finding that the SCSP will minimize environmental impacts.

- Because the SCSP and the DEIR impose a buffer requirement that will restrict existing uses and create nonconformities, substantial evidence does not support the conclusion that the SCSP will preserve existing operations.

- Because the SCSP contemplates the creation of new, isolated residential zoning districts, substantial evidence does not support the conclusion that the SCSP would protect against incompatible uses; rather, it would exacerbate such conflicts.

- Because the SCSP and the DEIR impose requirements that are far more drastic and unlike any requirements adopted by any local governments that competes with the City for industrial development, substantial evidence does not support the conclusion that the SCSP would "expand the supply of 'shovel-ready' sites."

Because the SCSP does not meet the Project Objectives, it should not be considered for approval. In fact, a comparison of the SCSP with the Business Plan Option ("BPO") shows that the BPO would likely better promote the Project's Objectives than the SCSP while actually ***reducing significant potential impacts***. (Compare DEIR, pp. 6-11–6-14 [analyzing SCSP impacts relative to no-project alternative] with 6-39–6-41 [analyzing BPO impacts relative to SCSP impacts].) According to the DEIR, the BPO would have "less" impact with respect to population and housing and "similar" impacts with respect to most other categories. (See *id*.) While the DEIR finds the BPO would have a "slightly greater" impact with respect to air quality, greenhouse gas emissions, and transportation, substantial evidence does not support these findings.[18]

To the extent the SCSP may be argued to meet the Project Objectives, it is only because the DEIR employs an enigmatic and unstable project description that sends conflicting signals to decision makers and the public about the nature of the proposed project, effectively treating the SCSP's adoption as a foregone conclusion. The DEIR identifies eight Project Objectives.[19] While no explicit prioritization is assigned to the Project Objectives, the focus appears to be on promoting economic development, as five of the eight objectives relate to that goal. In contrast, the DEIR devotes comparatively little attention to the Project's other

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[18] The DEIR finds a supposedly "greater" impact to air quality because operational emissions would be "slightly greater" but also incongruously finds that, "unlike the [SCSP], the [BPO] would not place sensitive receptors near high-volume roadways or other substantial sources of TACs." (DEIR, p. 6-39.) Similarly, with respect to greenhouse gas emissions the DEIR finds operational emissions would be "slightly greater" due to higher industrial development even though it acknowledges "the same mitigation measures [might] apply" to industrial development as other types. (*Id*. at 6-40.) As to transportation, both the SCSP and the BPO would reduce impacts relative to existing conditions, according to the DEIR, but the BPO's reduction would be approximately 4% less than the SCSP's. This indicates the transportation impacts of the BPO are "similar" to those of the SCSP, not "greater." (See *id*. at 6-41.) Thus, substantial evidence does not support these findings. (See also *supra* at § C.3.)

[19] Five are directed at promoting or preserving economic growth and development in the Plan Area: (i) to "[p]romote inclusive and sustainable economic growth and attract development that focuses on emerging markets and new technologies;" (ii) to "[c]reate diverse employment opportunities, including an accessible and resilient employment zone;" (iii) to "[p]reserve the viability of existing industrial and manufacturing operations in the Plan Area;" (iv) to "[p]rotect existing and future development from adverse impacts associated with incompatible uses;" and (v) to "[i]mprove Plan Area infrastructure . . . to expand the supply of 'shovel-ready' sites." (See DEIR, pp. 2-1–2-2.) Two are focused on enhancing residential uses in the Plan Area: (i) to "[c]onsider project-specific environmental effects . . . on existing and potential future sensitive receptors and impose measures to minimize such impacts" and (ii) to "provide residents with clear and transparent access to information regarding community development and assist in addressing disputes and concerns." (*Id*.) And one is focused on improving visual character—*i.e.*, to "[t]ransform State Routes 99 and 41 as Gateways into the City . . . to improve visual quality when entering the Plan Area." (*Id*.)

objectives—*i.e.*, enhancing visual quality and residential uses—which together account for just three objectives. The DEIR appears to acknowledge this at times, stating, for instance, that the "primary impetus for the SCSP is economic development and job growth." (*Id*. at 2-2; see also *id*. at 6-6 ["[O]ne of the primary project objectives is to create diverse employment opportunities."]) Yet, elsewhere the various objectives are described as though they are all equal. (See *id*. at 2-1 [stating that the Project's "overarching vision . . . is to improve the City's overall economic competitiveness, support employment opportunities for residents, and maintain and improve community livability"], 3-5 [describing "vision and guiding principles centered around balancing the needs of industrial users, ensuring a diverse employment base, and minimizing impacts on the environment and neighborhoods"].) Complicating matters further, the SCSP contains an entire chapter titled "Vision, Guiding Principles, & Policies" and, while there is overlap with the Project Objectives, in many cases the SCSP's stated objectives are different than the Project Objectives described in the DEIR. (Compare *id*. at 2-1–2-2 with SCSP, pp. 38–42.) Despite this, the DEIR does not address the relationship between the SCSP's objectives and the Project Objectives nor explain the role, if any, the SCSP's objectives play with respect to environmental review. Rather, the DEIR appears to pick and choose as necessary to support the desired outcome: adoption of the SCSP.

The lack of a clear, accurate, and stable project description in the DEIR as well as the conflicting signals arising from inconsistencies between the objectives set forth in the DEIR and those described in the SCSP undermine the DEIR's environmental impact analyses and mitigation measures, foreclose a meaningful alternatives analysis, and inhibit the DEIR's use as an informational document, contrary to CEQA.

5. The City Must Perform a Holistic Evaluation of its Efforts Across the City to Downzone or Rezone Industrial Properties

"CEQA contemplates consideration of environmental consequences at the 'earliest possible stage, even though more detailed environmental review may be necessary later.'" (*Rio Vista Farm Bureau v. County of Solano* (1992) 5 Cal.App.4th 351, 370 [quoting *Leonoff v. Monterey County Bd. of Supers.* (1990) 222 Cal.App.3d 1337, 1346].) CEQA therefore prohibits the piecemealing—or segmentation—of environmental review. In other words, the "requirements of CEQA cannot be avoided by piecemeal review which results from chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." (*Envt'l Prot. Info. Ctr. v. Calif. Dept. of Forestry & Fire Prot.* (2008) 44 Cal.4th 459, 503; *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1208-09; *Bozung v. LAFCo* (1975) 13 Cal.3d 263, 283-84.)

As explained above, the SCSP is one of many actions where the City has limited or downzoned industrial properties within the City. These actions are all related since they concern the same subject matter (industrial zoning), the same location (the City), and achieve the same result (less industrial zoning in the City). Further, such actions have, and will continue to, incentivize industrial development in other Central Valley jurisdictions, such as the City of Visalia, the County of Madera, and the County of Tulare, rather than the City. (See Attachment A, pp. 4–

8.) This has the potential to cause significant impacts to air quality, greenhouse gas emissions, agricultural resources, and transportation. (See *supra* at § C.3.) Therefore, until the City addresses its reduction of industrial zoned property as a whole, the City will not comply with CEQA.

At the very least, the City should assess this impact as a cumulative impact. CEQA "require[s] a finding that a project may have a 'significant effect on the environment' if . . . [t]he possible effects of a project are individually limited but cumulatively considerable." (Pub. Res. Code, § 21083.) A project's cumulative impacts are significant if the project's incremental contribution to the impact is "cumulatively considerable." (CEQA Guidelines, § 15130(a).) A Project's incremental contribution is cumulatively considerable if the incremental effects of the project are significant "when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (*Id*. at § 15065(a)(3).)

The fact that a particular project's incremental impact is not alone significant, or is relatively small when compared to the greater overall problem, does not mean the project does not have significant cumulative impacts. The courts have rejected this theory because it would allow "the approval of projects which, when taken in isolation, appear insignificant, but when viewed together, appear startling." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720-21.) The proper standard for a cumulative impacts analysis is therefore whether the impacts are "collectively significant." (*Id*. at 721 [citing CEQA Guidelines, § 15355].) An EIR must also "establish the geographic scope of the area affected by the cumulative impacts." (*League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 148.) "The geographic scope to be analyzed must be reasonably defined." (*Id*.) It "cannot be so narrowly defined that it necessarily eliminates a portion of the affected environmental setting." (*Bakersfield, supra*, 124 Cal.App.4th at 1216.) "Nor may it be defined so broadly as to dilute the significance of a project's cumulative impact." (*League to Save Lake Tahoe, supra,* 75 Cal.App.5th at 148.)

If a project's incremental contribution to the impact is "cumulatively considerable"—*i.e.,* if the project's impacts, taken together with those of similar projects, are "collectively significant," (*Kings County Farm Bureau, supra*, 221 Cal.App.3d at 721)—the lead agency must examine reasonable, feasible options for reducing or avoiding the project's contribution to those significant impacts. (CEQA Guidelines, § 15130(b)(5); see also Pub. Res. Code, §§ 21064.5, 21080(c)(2); CEQA Guidelines, § 15064(f)(2), 15070(b).) "If the lead agency finds either that the combined impact is insignificant or the project's contribution is not cumulatively considerable, the EIR must briefly explain the basis for the agency's finding and, where the impact is found to be insignificant, identify facts and analysis supporting the agency's conclusion." (*League to Save Lake Tahoe, supra*, 75 Cal.App.5th at 148.)

Substantial evidence shows the ongoing reduction of industrial zoned property in the City has caused, and will continue to cause, increased industrial development in other Central Valley markets. (See Attachment A, pp. 4–8; Market Analysis at 22–23, 27–31, 35–38; Attachment B; Attachment D.) Further, increased industrial development in other Central Valley markets has the potential to cause significant environmental impacts to agricultural resources, air quality, greenhouse gas emissions, and transportation, among other things. (See, e.g., DEIR, §§

4.2.2, 4.3.3, 4.8.3, 4.15.3.) While specific details regarding the exact location and extent of development in other Central Valley markets may be uncertain to some extent, a general trend of increased development in competitive Central Valley markets is reasonably foreseeable and historical data regarding general market trends in the Central Valley provides sufficient information for meaningful environmental review. Under these circumstances, CEQA requires a proper cumulative impact analysis be performed to enable the public and decision makers to understand and consider meaningfully the issues raised by the proposed project.

Accordingly, the DEIR must assess the impacts resulting from the City's ongoing efforts to reduce industrial zoned property in the City, determine whether the Project makes a "cumulatively considerable" incremental contribution to those impacts, and if so, examine reasonable, feasible options for reducing or avoiding the Project's contribution to those significant impacts.

D. Several Proposed Mitigation Measures Are Infeasible

When imposing mitigation, lead agencies must ensure there is a "nexus" and "rough proportionality" between the measure and the significant impacts of the project. (CEQA Guidelines, § 15126.4(a)(4)(A)–(B) [citing *Nollan v. Calif. Coastal Comm'n* (1987) 483 U.S. 825; *Dolan v. City of Tigard* (1994) 512 U.S. 374].) Mitigation measures must also be feasible to be effective. (CEQA Guidelines, § 15041.) Several of the mitigation measures described in the DEIR are infeasible and/or bear no rough proportionality to development within the SCSP area:

- The DEIR requires that Class 7-8 vehicles domiciled on property must be fully electrified by December 31, 2026. (DEIR, MM 4.3-1h.). The DEIR likewise requires that businesses must begin to convert Class 2-6 vehicles domiciled on property to ZEVs at the start of operations, and transition the entire fleet to ZEVs by December 31, 2031. (*Id*. at MM 4.3-1i.) In addition, new projects will require the installation of infrastructure to support ZEVs. Heavy duty ZEVs are a nascent technology that are generally unreliable, over twice as expensive as combustion engines, and not widely available. Due to this reality, stakeholders have argued CARB's Advanced Clean Fleets and Advanced Clean Truck regulations are infeasible. Yet the DEIR seeks to impose requirements that are vastly more aggressive than those regulations. There is simply no evidence the ZEV purchase mandate is feasible as a general matter—let alone feasible consistent with the Project Objectives related to stimulating economic development and creating employment opportunities, and preserving the viability of industrial operations.

- Mitigation Measure 4.6-1d requires the installation of solar sufficient to power at least 50% of the amount of energy needed for future development. This is not only an expensive investment, and there is no evidence in the record to suggest this requirement is feasible, generally or consistent with

the Project Objectives. Indeed, it would be virtually impossible to have enough rooftop solar to offset 50% of the demand of many types of manufacturing, which is the most frequently cited type of industrial job that qualifies as a "good job."

- Mitigation Measure 4.3-1b requires the use of clean fleets during construction. The problem is that the cleanest levels of construction equipment are not widely available, and developers often must wait several months before they can be used on a project site.

- Mitigation Measure 4.3-1a contemplates that applicants would be required to fund Voluntary Emissions Reduction Agreements (VERA) with the SJVAPCD. There is no evidence this requirement is feasible. Under a VERA, an applicant must pay $9,350/ton for construction NOx/VOC emissions and $93,500/ton for operational NOx/VOC emissions, and similar amounts for particulate matter, plus a 4% administrative fee. This is a generally applicable requirement, and there is simply no evidence to suggest this mitigation measure is generally feasible or would not obstruct the Project Objectives.

The DEIR's failure to properly analyze the feasibility of mitigation measures is exacerbated by the lack of any analysis regarding the economic and social impacts of the SCSP's adoption. As the Guidelines explain, "[e]conomic, social, and [] housing factors ***shall*** be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR." (CEQA Guidelines, § 15131(c) [emphasis added].) Thus, if such information is not included in the DEIR, it "***must*** be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project." (*Id*. [emphasis added].) The DEIR, however, fails to analyze economic and social factors arising from SCSP's adoption and therefore such information cannot be accounted for when evaluating the feasibility of proposed mitigation measures, contrary to the requirements of CEQA. (See Pub. Res. Code, § 21081(a)(3); see also *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 948.) This deficiency not only compromises the development of adequate mitigation measures as a general matter, it also renders ineffective, unenforceable, and/or improperly deferred mitigation measures that expressly incorporate the concept of feasibility, as many do. (See, e.g., MM 4.2-1, 4.3-1a, 4.3-1m, 4.3-3d, 4.5-2b-c, 4.6-1d.)

E. The DEIR Fails to Assess Environmental Effects Associated with the Requirement to Transition to Electric Vehicles

An environmental impact report is not only required to assess the potential impacts of the Project. To be adequate under CEQA, the DEIR must also discuss and evaluate the potentially significant environmental effects caused by mitigation measures themselves. (CEQA Guidelines, § 15126.4(a)(1)(D); *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986.) Here,

the DEIR includes purchase mandates for ZEVs at a rate far exceeding that imposed by CARB. The DEIR, however, includes no discussion of the potential impacts that the early transition to ZEVs might create:

- The DEIR does not address increased electricity demand associated with the accelerated transition to electric vehicles. This is particularly important due to the unreliability of PG&E and the fact that many neighborhoods within the City regularly experience power outages.[20] The lack of electrical infrastructure to support the anticipated increases in the Plan Area is a major near- and medium-term issue because it will increase energy demands, complicate PG&E approvals, necessitate locking down tenants much earlier in the development process, and require them to wait even longer before commencing operations. (See Attachment A, pp. 7–8.) This means additional risk and longer delays for both developers and tenants, and further reduces the City's competitiveness relative to other markets. (*Id.*)

- The DEIR does not analyze the emissions associated with the operation of ZEVs. For example, the DEIR does not analyze or include an assessment of the impacts on ZEV weight on particular PM emissions from tire wear and entrained road dust, even though it is reasonably foreseeable that ZEVs will be heavier than the internal combustion engine vehicles (ICEVs) currently on the road. (See Attachment E, pp. 24–25.)

- ZEVs have a smaller hauling capacity than trucks with internal combustion engine vehicles (ICEVs). The performance of ZEVs also degrades in the heat. Despite this, the DEIR contains no discussion of the additional vehicle miles traveled that would result from the early transition to ZEVs.

- The transition to electric vehicles at a rate far exceeding that imposed by CARB would accelerate the recognized environmental impacts associated with the need to develop electric infrastructure and new/modified facilities to meet the demand for ZEVs. In the environmental analysis performed for the ACF Regulation, CARB found the construction of infrastructure and the new/modified facilities would result in significant and unavoidable environmental effects. (See generally Attachment F.) The SCSP would accelerate the need for this infrastructure and new/modified facilities,

[20] See https://data.usatoday.com/national-power-outage-map-tracker/area/fresno-county-ca/06019/;

https://www.yourcentralvalley.com/news/local-news/pge-may-shut-off-power-to-areas-of-fresno-county-merced-county-this-weekend/.

exacerbating those effects. The DEIR should therefore be augmented to include an analysis of these impacts and recirculated for public review.

F. The SCSP is Inconsistent with the Goals and Policies of the City's General Plan

California's Planning and Zoning Law ("PZL") requires that all municipalities adopt a general plan. (Govt. Code, § 65300.) While charter cities are not subject to ***some*** of the PZL's consistency requirements, the Government Code expressly requires that a charter city's general plan to be ***internally*** consistent. (See *id*. at § 65300.5; see also Fresno General Plan ("FGP"), pp. 1-3–1-4.)

Moreover, a subsequent project that is not consistent with a charter city's general plan gives rise to a presumption that the project approval constitutes an abuse of discretion. (See, e.g., *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 414–415.) A "project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Corona-Norco*, *supra*, 17 Cal.App.4th at 994.) While perfect conformity may not be required, "a project ***must*** be compatible with the objectives and policies of the general plan." (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 782 [emphasis added] [citing *Families Unafraid to Uphold Rural etc. County v. Board of Supers.* (1998) 62 Cal.App.4th 1332, 1336].) "A project is inconsistent if it conflicts with a general plan policy that is fundamental, mandatory, and clear." (*Id*. at 782.)

The SCSP conflicts with several objectives and policies of the City of Fresno's General Plan. For instance, ED-1 emphasizes the need to support economic development by "maintaining a strong working relationship with the business community and improving the business climate for current and future business." (FGP, p. 2-21.)[21] Indeed, expanding and retaining industrial industries within the City of Fresno is the "'bread and butter' of a solid economic development program. . ." (*Id*. at 2-13.)

To implement this objective, ED-1-d directs the City to "[e]xplore increasing the amount of land properly zoned, consistent with the General Plan, and ready to be expeditiously developed, redeveloped, and/or revitalized for ***economic development and job creation purposes***." (*Id*. at 2-21 [emphasis added].) Not only is the SCSP inconsistent with the general plan it requires the City to concurrently amend the general plan if it is adopted.[22] (See, e.g., SCSP,

[21] The existence of this letter, authored on behalf of several business and landowners within the SCSP, demonstrates the lack of a strong working relationship with the business community as envisioned by the FGP.

[22] In addition to foreseen amendments to the general plan, the SCSP also acknowledges that the City will need to adopt concurrent amendments to the Development Code, repeal the existing

p. 134; DEIR, pp. 2-46, 2-47 ["Implementing the proposed plan would require a general plan amendment to allow for the proposed land use changes, as some of the proposed land uses differ from the general plan. ***With the approval of the amendment***, the SCSP would be consistent with the City of Fresno General Plan."][emphasis added].)

Instead of increasing land zoned for economic development and job creation purposes the SCSP reduces it. As discussed above, the downzoning of properties away from heavy and light industrial land uses within the peripheries of the SCSP combined with the City's limited opportunities for industrial growth or expansion will steer existing and potential economic investment elsewhere. (See Attachment A, pp. 5–8; *supra* at § C.3.)

Such results conflict with other General Plan policies and objectives as well, including:

- ED-3: "Attract and recruit businesses and offer incentives for economic development." (FGP p. 2-23.) To implement this objective, ED-3-a directs the City to adopt and implement programs to expand existing businesses and attract new businesses. Downzoning, buffers, and limited protection from Legal Non-Conforming Use provisions will cause existing businesses to abandon the City and repel new businesses from entering the City.

- LU-7 "Plan and support industrial development to promote job growth." (*Id*. at 3-54.) The City is intended to "[p]romote industrial land use clusters to maximize the operational efficiency of similar activities." (*Id*. at LU-7-c.) The General Plan notes a need to provide relatively high-income jobs to promote economic development. Several industrial businesses, including manufacturing, provide generally high paying jobs and opportunities for advancement. (*Id*. at Table 2.5.) To foster these job opportunities, industrial development is critical. The only planning area within the City that includes land available for industrial development is the area within the SCSP, yet with the SCSP's intended downzoning, opportunities for industrial development further wane. If industrial development dissipates, the opportunities for job growth also disappear. Most manufacturing uses require Heavy Industrial zoning, which is virtually eliminated from the parts of the Plan area that are undeveloped.

G. The SCSP Effectuates Spot Zoning

"Spot zoning occurs where a small parcel is restricted and given lesser rights than the surrounding property, as where a lot in the center of a business or commercial district is limited to uses for residential purposes thereby creating an "island" in the middle of a larger area devoted

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North Avenue Industrial Triangle Specific Plan and replace the overlapping portion of the Roosevelt Community Plan to "allow for consistency." (SCSP at pp. 16, 68.)

to other uses." (*Foothill Communities Coal. v. Cnty. of Orange* (2014) 222 Cal.App.4th 1302, 1311 [citing *Arcadia Development Co. v. City of Morgan Hill* (2011) 197 Cal.App.4th 1526, 1536].) The SCSP would cause spot zoning by creating small, isolated clusters of properties that are zoned residential, even though they are surrounded by industrial properties and the owners of the clusters of property intend to develop those properties to industrial land uses. While the City may assert that the residential zoning is necessary to avoid nonconformities, this assumes the individual landowners want their properties zoned residential. Moreover, the creation of small, isolated clusters of residential zoned properties is not in the public interest, especially since those properties will result in a buffer area where adjacent land uses will be severely restricted, and the buffers themselves will create an even greater number of nonconformities than an isolated residence.

H. The AB 617 Truck Reroute Study is Deeply Flawed

The conclusions in the SCSP and the DEIR appear to be based in part on the South Central Fresno AB 617 Community Truck Reroute Study: Truck Routing and Implementation Strategies Report (April 2024) (the "Reroute Study"). For the reasons stated in my May 22, 2024, letter on the Reroute Study, the City should not take action on that document or use it in connection with either the SCSP or the DEIR. (See Attachment G.)

I. The SCSP Is Preempted by the Clean Air Act

Section 209(a) of the Clean Air Act, 42 U.S.C. § 7543(a), provides that states and their political subdivisions are preempted from adopting or attempting to enforce "any standard relating to the control of emissions from new motor vehicles . . . ." (See *Engine Mfrs. Ass'n v. S. Coast Air Quality Mgmt. Dist.* (2004) 541 U.S. 246 ("*EMA*"); *Jensen Family Farmsi, Inc. v. Monterey Bay Unified Pollution Control Dist.* (2011) 644 F.3d 934, 938; *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation* (9th Cir. 2020) 959 F.3d 1201, 1217 ["*Volkswagen*"] ["Section 209(a) precludes a local government from enforcing 'any standard relating to the control of emissions from new motor vehicles."].) Likewise, Section 209(e) preempts states and their political subdivisions from adopting or attempting to enforce standards or requirements related to non-road mobile sources. (42 U.S.C. § 7543(e); see *Jensen Family Farms, supra*, 644 F.3d at 938.)

The SCSP proposes mitigation measures preempted by the CAA, including Mitigation Measures 4.3-1h and 4.3-1i. Mitigation Measure 4.3-1h requires, in pertinent part, future tenants of new and redeveloped commercial and industrial land uses to ensure that all heavy-duty trucks (Class 7 and 8 vehicles) domiciled on the project site are model year 2014 or later from start of operations and to expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2026 or when commercially available for the intended application, whichever date is later. It also requires that all heavy-duty truck fleets associated with operational activities for industrial uses or uses that require deliveries to and from the site to utilize the cleanest available heavy-duty trucks, including zero and near-zero that meet 0.02 gram per brake

horsepower-hour NOx technologies. Finally, all operational on-site equipment, including cargo handling, yard hostlers, forklifts and pallet jacks, must be zero-emission.

Mitigation Measure 4.3-1i in turn mandates future tenants of new and redeveloped commercial and industrial land uses within the SCSP to use a "clean fleet" of vehicles, delivery vans, and trucks (Class 2 through 6 vehicles) in their business operations pursuant to the following schedule:

- 33 percent of the fleet shall be zero emission at the start of operations;
- 65 percent of the fleet shall be zero emission vehicles by December 31, 2027;
- 80 percent of the fleet shall be zero emission vehicles by December 31, 2029; and
- 100 percent of the fleet shall be zero emission vehicles by December 31, 2031.

Mitigation Measures 4.3-1h and 4.3-1i create a generally-applicable requirement that fleet operators expedite transition to zero-emission vehicles and zero-emission on-site equipment, including forklifts, cargo-handling vehicles, and yard hostlers. (SCSP, MM 4.3-1h, 4.3-1l.) In effect, these measures essentially operate as purchase mandates.

A standard broadly includes that which was "established by authority, custom, or general consent, as a model or example; criterion; test." (*EMA*, *supra*, 541 U.S. at 252–253 [opinion by Justice Scalia striking down as preempted a rule that effectively required the purchase of lower emission vehicles].) Standards may denote "not only 'numerical emission levels with which vehicles or engines must comply…' but also 'emission-control technology with which they must be equipped…'" (*Volkswagen*, *supra*, 959 F.3d 1201 at 1218, [quoting *EMA*, *supra*, 541 U.S. 246 at 253].)

In *EMA*, the United States Supreme Court determined that a series of regulations promulgated by the South Coast Air Quality Management District, which contained detailed prescriptions regarding the types of vehicles that fleet operators must purchase or lease when adding or replacing fleet vehicles qualified as standards under the meaning of Section 209. (*EMA*, *supra*, 541 U.S. at 252–255.) Because the proposed mitigation measures require certain emission-control technology (*i.e.*, zero-emissions technology) be used amongst fleet operators' motor vehicles, these measures effectively operate as a purchase mandate which constitute emissions standards under the CAA. (*EMA*, *supra*, 541 U.S. at 255–256.) These standards, therefore, require a waiver. (See 42 U.S.C. § 7543(b), (c)(2).)

Although CARB has received various waivers for certain regulations, including the Advanced Clean Trucks regulation, Mitigation Measures 4.3-1h and 4.3-1i propose ***more*** stringent regulations of vehicle fleets and non-road vehicles. No waiver issued to date authorizes the adoption or enforcement of the regulations proposed by the SCSP as they are even more onerous than CARB's own regulations. Further, EPA cannot grant a waiver to the City of Fresno because the City of Fresno has no authority to request a waiver under either § 209(b) or § 209(e). (See U.S.C. § 7543(b), (c).) Accordingly, the Mitigation Measures, to the extent the proposed regulations are more stringent than those CARB currently has received waivers to adopt and enforce, are preempted under section 209 of the CAA.

J. Several Mitigation Measures Are Preempted By the California Health & Safety Code

1. SCSP Mitigation Measures Are Preempted Because the California Legislature Has Fully Occupied the Field

Article XI, section 7 of the California Constitution provides that "a county or city may make and enforce within its limits all local, police, and other ordinances and regulations not in conflict with general law." However, if an "otherwise valid local legislation conflicts with state law, it is preempted by such law and is void.'" (*Chevron v. U.S.A. Inc. v. County of Monterey* (2023) 15 Cal.5th 135, 140 [quoting *Sherwin-Williams Co. v. City of Los Angeles* (1993) 4 Cal.4th 893, 897].) A conflict with general law arises when local legislation

> enters an area that is "fully occupied" by general law when the Legislature has expressly manifested its intent to "fully occupy" an area [citation], or when it has impliedly done so in light of one of the following indicia of intent: (1) the subject matter has been so fully and completely covered by general law as to clearly indicate that it has become exclusively a matter of state concern; (2) the subject matter has been partially covered by general law couched in such terms as to indicate clearly that a paramount state concern will not tolerate further or additional local action; or (3) the subject matter has been partially covered by general law, and the subject is of such a nature that the adverse effect of a local ordinance on the transient citizens of the state outweighs the possible benefit to the locality.

(*Id*. [some internal quotations omitted].)

California's air resources are governed by Division 26 of the Health and Safety Code and regulations implemented by CARB. In Division 26, the Legislature expressed its intent to fully occupy the field of air pollution control and preempted local and regional authorities from regulating air pollution related to vehicular sources. Section 39002 of the Health and Safety Code provides that "[l]ocal and regional authorities have the primary responsibility for control of air pollution from all sources ***other than vehicular sources***. ***The control of vehicular sources***, except

as otherwise provided in this division, ***shall be the responsibility of the State Air Resources Board***." (Health & Saf. Code, § 39002 [emphasis added].)

The Legislature further indicated its intent to occupy the field by providing CARB the exclusive authority to "adopt standards, rules, and regulations…necessary for the proper execution of the powers granted and imposed upon, [CARB] by [Division 26] and by any other provision of law." (Health & Saf. Code, § 39601 (a); see also *id*. at § 39602 ["The state board is designated as the state agency responsible for the preparation of the state implementation plan required by the Clean Air Act . . . and, to this end, shall coordinate the activities of all districts necessary to comply with the act."].) Amongst its promulgated responsibilities, CARB is charged with preparing the state implementation plan required by the Clean Air Act, (*id*. at § 39602); providing summaries of actions taken by CARB or the air quality districts, (see *id*. at § 39604); and, in some instances, adopting a market-based incentive program as an element of an air quality districts' attainment plan for state or federal ambient air quality standards, provided that the program "will not result in a greater loss of jobs or more significant shifts from higher to lower skilled jobs . . . ." (*Id*. at §§ 39616(b)(1), 39616(b)(4).) Conspicuously absent from the relevant air quality statutes is the inclusion or grant of any authority to localities, like the City of Fresno, to regulate air quality, again evidencing the Legislature's intent to fully occupy this area of law. (See *Sherwin-Williams Co. v. City of Los Angeles* (1993) 4 Cal.4th 893, 898; see also *Chevron*, *supra*, 15 Cal.5th 135 at 145–146.)

California law also fully occupies the more narrow field of vehicular air pollution control, including motor vehicles emissions, for "[i]t is the intent of the Legislature that the State Air Resources Board shall have the responsibility, except as otherwise provided in this division, for control of emissions from motor vehicles…" (Health & Saf. Code, § 39500; see also *id*. at §§ 43000.5 ["The state board should take immediate action to implement both short- and long-range programs of across-the-board reductions in vehicle emissions and smoke, including smoke from heavy-duty diesel vehicles…"], 43101 ["The state board shall adopt and implement emissions standards for new motor vehicles for the control of emissions from new motor vehicles that the state board finds to be necessary and technologically feasible to carry out the purposes of this division."], 43013(a) ["The state board shall adopt or implement motor vehicle emission standards, in-use performance standards, and motor vehicle fuel specifications for the control of air contaminants and sources of air pollution], 43013(b) ["The state board shall… adopt standards and regulations for light-duty *and heavy-duty* vehicles…and off-road or nonvehicle engine categories…"], 43013(h) ["It is the intent of the Legislature that the state board act as expeditiously as is feasibly to reduce nitrogen oxide emissions from diesel vehicles… and other categories of vehicular or mobile sources which significantly contribute to air pollution problems."].)

It is clear the Legislature intended for CARB's standards to occupy the motor vehicle emissions field to promote consistency. (See *id*. at § 43000 ["The state has a responsibility to establish ***uniform procedures*** for compliance with standards which control or eliminate those air pollutants [from motor vehicles]." [emphasis added].) Implementation of Mitigation Measure 4.3-1h and 4.3-1i would directly affect emissions of air pollutants from motor vehicles, threatening

the very uniformity the Legislature sought in adopting Part 5 of Health and Safety Code Division 26.

Mitigation Measures 4.3-1h and 4.3-1i require fleet vehicle operators of motor vehicles, including non-road motor vehicles, to purchase zero-emission vehicles within the SCSP. However, even if the Legislature did not intend to fully occupy the entire field of motor vehicle emissions, it plainly intended to occupy the area covered by these Mitigation Measures. The Health and Safety Code requires CARB to "adopt standards and regulations including but not limited to . . . requiring the purchase of low-emission vehicles by state fleet operators." (*Id*. at § 43018(c)(3).) Pursuant to its authority under this provision CARB promulgated a series of regulations, including Advanced Clean Trucks, Advanced Clean Fleets, and the Zero-Emission Forklift regulations, which set forth standards requiring fleet vehicle operators to transition their fleets to zero-emission. The Mitigation Measures regulate the same motor vehicles and, in some cases, apply more stringent standards. Therefore, the Mitigation Measures Encroach on an area of law the Legislature intended to occupy and do so in a manner that prohibits conduct that would otherwise be permitted under state law. (See *infra* § J.2.)

2. SCSP Mitigation Measures Are Preempted Because they Contradict General Law

A conflict with general law also arises when local legislation local legislation is contradictory to general law. (*Sherwin-Williams Co., supra*, (1993) 4 Cal.4th at 897.) A law is contradictory to general law where it is inimical thereto. (*Id*. at 898; see also *Chevron*, *supra*, 15 Cal.5th at 142.) A local law is inimical to—and therefore conflicts with—a state law in two situations: where the local law directly prohibits what the state enactment demands or the local ordinance prohibits what the state enactment permits or authorizes. (See *AIDS Healthcare Foundation v. Bonta* (2024) 101 Cal.App.5th 73, 86–87; *City of Riverside v. Inland Empire Patients Health & Wellness Center* (2013) 56 Cal.4th 729, 743; *Chevron*, *supra*, 15 Cal.5th at 149.) The latter situation is applicable here.

The Mitigation Measures are generally applicable requirements providing that no internal combustion engine vehicles ("ICEVs") may be added to a fleet after a certain date and requiring ICEVs' complete replacement by 2031. These provisions prohibit acts permitted by Section 43021 of the Health & Safety Code.

Section 43021 was enacted "to provide owners of self-proposed commercial motor vehicles . . . certainty about the useful like of engines certified by" CARB and other agencies "to meet required environmental standards for sale in the state." (Health & Saf. Code, § 43021 (d).). As the Senate Bill Analysis for S.B. 1 explains, Section 43021 "[s]ets a 'useful life' period where truckers subject to future, undefined regulations can get a return on their investment before being asked to replace or modify the vehicle. Thus, if CARB adopts future in-use regulations, trucks will not be required to turnover until they have reached 13 years from the model year the engine and emission control systems are first certified or until they reach 800,000 vehicle miles traveled.

(California Bill Analysis, S.B. 1 Sen., 4/3/2017.)[23] Accordingly, Section 43021 provides that, with limited exceptions inapplicable here, "the retirement, replacement, retrofit, or repower of a self-propelled commercial motor vehicle . . . ***shall not be required*** until the later of . . . [t]hirteen years from the model year the engine and emission control system are first certified" or when "the vehicle reaches the earlier of either 800,000 vehicle miles traveled or 18 years" from the certification of the engine and emission control system. (Health & Saf. Code, § 43021(a) [emphasis added].)

Mitigation Measures 4.3-1h requires the use of Class 7 and 8 ZEVs by December 31, 2026 and 4.3-1i requires the complete use of Class 2 through 6 ZEVs by December 31, 2031. In effect, both measures prohibit the use of any ICEVs by December 31, 2031. These measures therefore foreclose business owners' ability to operate newer model ICEVs which would otherwise be permissible under Section 43021 for 13 years from the model year the engine and emission control systems are first certified within the SCSP. Accordingly, both Mitigation Measures directly contradict Section 43021 of the Health & Safety Code and are preempted. (See *AIDS Foundation*, *supra*, 101 Cal.App.5th at 87.)

K. Conclusion

The SCSP and the DEIR are deeply flawed documents. At a foundational level, if adopted they would undermine the City's ability to compete with nearby communities for industrial development. They likewise seek to impose infeasible requirements not found in other competitor cities, while at the same time declining to evaluate the impacts of those requirements. Due to these and other concerns, the SCSP should not be adopted as currently proposed. The City should instead decline to adopt the SCSP, and direct staff to work with industrial stakeholders in good faith to strike a meaningful and achievable balance between industrial development and nearby communities that does not undermine the City's competitiveness.

Respectfully submitted,

John P. Kinsey

Enclosures

[23] As noted in Section J(2) of this letter, the Legislature has expressly and impliedly occupied the field of vehicular emissions. CARB, not the City, has the express authority to adopt future in-use regulations which would be directly affected by Section 43021. As a result, the mitigation measures are preempted by Section 43021.

ATTACHMENT “A”

NEWMARK
PEARSON COMMERCIAL

July 30, 2024

Mr. John Kinsey, Esq.
Wanger Jones Helsley, PC
265 E. River Park Circle, Suite 310
Fresno, CA 93720
jkinsey@wjhattorneys.com
Sent via e-mail

Re: Site Selection Methodology

Dear Mr. Kinsey:

This letter serves as my expert opinion regarding the methodology that many companies utilize to select a location for an industrial facility and the potential impact of the City implementing the requirements of the Draft EIR and Specific Plan for South Central Fresno. Attached is my CV which is a true and correct description of my background and qualifications.

In evaluating this project, as a licensed commercial industrial real estate salesperson for over 20 years, I have taken the perspective of one who engages in the identification, selection and negotiation of and for industrial/commercial land and buildings on behalf of occupiers and owners. My role as an industrial real estate specialist is to provide information and analysis to my clients so that they may select the most appropriate land and/or building for their business.

My background and experience includes: ground-up development of single buildings and business parks, sales and leasing of industrial buildings, sales of industrial land and site selection. My projects have ranged in size from leasing 2,500 SF of "incubator" space to selling an 880,000 SF Class "A" portfolio of warehouses as well as leasing millions of feet of space. I have sold significant amounts of industrial land from less than an acre to more than 90 acres. The vast majority of my transactional experiences in commercial real estate have involved properties in the Central Valley of California.

When representing a potential occupier of space, my services include providing information regarding the following:

- Market trends and intelligence
- Available buildings
- Available land
- Recommendations on occupancy strategies

In this role, I typically engage in negotiations for the acquisition (defined as lease or purchase) of selected industrial real estate.

When representing an owner of a building(s) or land, my services include:

- Providing market data
- Making recommendations and suggestions on marketing strategy
- Marketing the property to prospective occupiers, developers and/or users
- Negotiating leases or sales
- Negotiating lease extensions/renewals

I am generally responsible for executing my clients' industrial real estate strategies in the portion of the Central Valley I consider my territory – Merced to Tulare. I work closely with my clients to understand their needs so that I can provide accurate information on the local market. Typically, my client's own property, desire to develop industrial projects, already occupy space in the Central Valley, or have identified the Central Valley for a new facility.

My training includes participating in numerous industry-specific seminars and classes, being selected for several top-performer conferences dedicated to industrial real estate and regular continuing education classes. I have spent more than 20 years in the industrial real estate field in Fresno. I earned my CCIM designation in 2008, which required almost 200 hours of classes focused on commercial real estate finance, development, underwriting and analysis as well as passing a comprehensive exam. I also earned my SIOR designation in 2018. SIOR is an international organization of 3,900 top-producing, tenured agents and brokers that specialize in industrial and office real estate. Finally, I have been a licensed real estate sales agent in California since 2003.

Location is Critical

I have actively marketed many new industrial developments, existing buildings as well as conducted site selection for new industrial buildings since 2003. With very few exceptions, location of a property is the most important criteria when selecting a site or building. The adage, "location, location, location" is true. Once a building is constructed it does not move so the right location has a decades-long impact on the viability of a project.

Developers of industrial real estate seek to ensure that they meet the needs of the market when selecting a location for a building or industrial park. In the Central Valley, proximity and access to a transportation corridor, such as Highway (HWY.) 99, is often a determining factor of whether a developer elects to build or pass on a site. Over time, it has become difficult to secure sites, especially those that are near Highway 99 and an interchange. There are only so many options available in this part of the state and often the City of Fresno is the initial, preferred location.

While it may seem that there is a near limitless supply of land along Highway 99 including vast amounts of open land or farms; most of the land cannot be developed for industrial uses. Availability of requisite infrastructure – water, sewer, water detention or storm drains, electric and gas utilities, telecommunications – dramatically reduces the inventory of developable land. Further, close proximity to the region's population centers, especially Fresno, makes a site more

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desirable to most businesses since employees rarely like to commute long distances meaning rural or remote sites are generally not attractive options. Further, with new development fees resulting from Vehicle Miles Traveled (VMT) calculations, developers may incur massive costs if their projects are located far from residences and employees. So, having sites near the most efficient transportation corridors is critical.

Once a site is identified other criteria must be met for it to be developed. Developers and businesses cannot unilaterally decide to construct a building or industrial park. Real estate improvement entitlements must be obtained from the appropriate agencies including the county and/or city where the building is to be built, and this is often when projects get delayed or fall apart. Most undeveloped sites will have to be rezoned and/or entitled and this takes time, expertise and funding. Municipalities often require developers to agree to specific conditions to get approvals for development, adding additional complexity, time, and cost to a project.

With respect to industrial development, the entitlement phase is very risky and necessitates making decisions far in advance of when development may begin. When the right location is secured the amount of risk in a project is greatly reduced, but certainly not eliminated.

Critical Site Selection Criteria

When companies elect to evaluate the area for an industrial facility, in addition to location, other factors come into play. Depending on the requirement, site selection, which is really a process of eliminating the non-contending sites as quickly as possible, may also encompass the following:

- Size of the local labor pool
- Prevailing wages for specific types of jobs
- Business climate
- Types of housing and its cost
- Transportation options
- Proximity to customers and suppliers

I have found site selection to often be dependent on the availability of a building or land that meets a company's needs. Since leasing and constructing a building are long-term, capital-intensive decisions most companies try to minimize the compromises and risks required to occupy space.

For instance, a company may want to lease 50,000 SF in the Fresno area. The company requires certain building features like:

- Minimum clear height
- Certain number of dock loading doors
- Specific electrical service
- Proximity to the freeway

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When tasked with identifying options that meet these criteria, many times the exact specifications cannot be met, and the company must compromise. Perhaps the company can operate in 40,000 SF or will consider taking 60,000 SF. Or, perhaps the company can manage with fewer loading doors than initially desired. These types of issues almost always arise when searching for space so the more options available to a company the better the chances the company can select the most appropriate building with the fewest compromises. The selection process often takes six or more months and numerous visits to prospective locations.

In my experience, the clear majority of site searches are focused on existing buildings, so it is incumbent on a developer to have standing inventory to compete for these requirements. If a building cannot be delivered immediately or within six months, most companies will not consider a site. The most successful local developers build industrial buildings speculatively so that they have readily available space when the opportunity presents itself. As speculative development is inherently very risky, the concern about entitlement risk is a critical determinant of site selection. Developers will more often than not try to secure sites that have known approval timelines, realistic conditions of development and support from local government.

Under these circumstances, downzoning can have a devastating impact on landowners whose properties are rendered inconsistent with the underlying zoning, as it diminishes the ability to attract the reputable, responsible, and well-capitalized businesses for tenants and buyers. Rezoning that creates non-conformities makes it nearly impossible to receive conventional financing for tenant improvements, regular maintenance, beautification, clean energy improvements, and other important expenses that may be needed, and can even result in an event of default on existing loans. Indeed, the mere threat of downzoning perpetuates the idea among businesses that the City is a risky place to operate and invest in real estate. Downzoning can also have a long-term negative impact on the City's finances, as the likelihood of improving vacant land will be diminished thus depriving the City of new, increased property tax revenue.

When an existing building is not an option, on occasion, a company may need a building built to its requirements, called a build-to-suit. This type of transaction requires an experienced, qualified developer or is overseen by the end-user itself. Again, these projects are likely to locate at a site that can be entitled within a reasonable amount of time.

Impact of Entitlement Risk

It is fair to say that the entitlement risk presented by selecting a site for new development in the City of Fresno has been the primary cause of numerous employers and developers electing to look at other municipalities in the Central Valley.

The last major industrial project approved by the City of Fresno was North Pointe Business Park, which is a nearly built-out 230-acre master planned industrial development that has been very successful due to its location in the City of Fresno and near the Hwy. 99 and North Ave.

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interchanges. I have been involved in marketing this project since portions of the land were a peach orchard as recently as 2005. Because of my role in this project, I have competed for most of the mid-sized (15,000+/- SF to 50,000+/- SF) and large (50,000+/- SF and up) industrial requirements that have considered the City of Fresno and have evaluated the market, so I am very familiar with the end-users' reasoning for considering and selecting the area for a new or expanded facility. North Pointe currently has 14 buildings, including Amazon's 855,000 SF fulfillment center, and it is estimated that over 5,000 people are employed at the park.

North Pointe is an example of a master-planned development controlled by a single developer. The development is ideally located near Hwy. 99 and the North Ave. interchange and about 5 miles south of Downtown Fresno and within 10 miles of most of the City's labor pool. Initially, the North Pointe developers benefited from the active support of the City of Fresno and the Council. Since the initial planning began almost 20 years ago, the elected officials, management, and staff at the City of Fresno consistently provided predictable, reasonable, and timely approvals of the buildings in the project. Without the City's support and encouragement, it is doubtful that the developer would have been able to secure as many tenants as they have. Unfortunately, over the last five years, the unpredictable nature of project approvals by the City has led to further development of the park and nearby parcels owned by the same developer from proceeding at a time when there has been historic demand for modern industrial buildings.

As Fresno did not expand its available inventory of developable industrial land and became more hostile to new industrial development, the County of Fresno has also benefited. South of the Study Area, is a project called West Tech Industrial Park, which is a 50-acre subdivision of smaller, light industrial buildings developed by a local developer. This project was built-out over the last 10 years at a location that has good Hwy. 99 visibility, but less than ideal access via circuitous, two-plus mile route from either American Ave. or Clovis Ave. and Hwy. 99 interchanges. The development is home to national businesses like Toyota Material Handling and United Rentals. Businesses eventually located at West Tech because it was one of the few developments in the area that offered ample yard and outdoor storage when the availability of comparable properties in Fresno became increasingly scarce.

The City of Visalia has been the prime beneficiary of the defacto industrial development moratorium imposed by the City and Council over the last five years. For example, the MidState 99 project in Visalia, which began in the 1990's and encompassed over 600 acres near Plaza Rd. and Goshen Ave., took almost 20 years to develop 75% of the land comprising the master planned project. The development lies 2 miles from the Betty Dr./Hwy. 99 interchange and 1.5 miles from the Plaza Dr./Hwy. 198 interchange. Significant investment in road infrastructure, utilities and marketing were expended to create a viable location for industrial businesses. The primary reason this development occurred was the belief of the developer that the location was ideal for many types of industrial businesses and the availability of land zoned and or designated for industrial development by the City of Visalia. Additionally, the developer worked closely with the City of Visalia to plan and support this area as one of the preferred locations for industrial development in that community.

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Over time, the MidState 99 project has become home to VF Corp., International Paper, Far West Distributors, Stihl Corporation, and many other well-known brands, including a new 1,000,000 SF regional fulfillment center for Ace Hardware. Over 4,000,000 SF of buildings have been built as part of the project and thousands of people are employed by these companies.

More recently, CapRock, which is a very active regional developer of large industrial buildings and business parks, has completed over 3,000,000 SF of Class "A" logistics buildings and has another 2,000,000 SF entitled in the northwest industrial area of Visalia. CapRock has been vocal in their praise for the approach the City of Visalia has taken to planning and approving projects. I estimate that over 2,500 people are employed at the UPS facility and the two Amazon warehouses.

Other industrial developments in the Central Valley have flourished due to similar attributes – location, ability to get key infrastructure to a site relative ease of entitlements and governmental support.

Further south, the Wonderful Industrial Park in Shafter is an excellent example of a development being disconnected from the nearby population center of Bakersfield, yet being a viable option for numerous businesses. The project is a 1,000+ acre master-planned business park that has received on-going support from the City of Shafter. The developer and City confirm that new project approvals can be completed in less than six months, which is a major competitive advantage.

When the Wonderful Park came to market in the early 2000's, the site was considered problematic due to its location even though it offered "shovel ready' sites and attractive rental rates. Over time and with a well-capitalized developer becoming involved, the location of the park became less of an issue because so few large sites that can accommodate 500,000+ SF buildings were available in the Central Valley. As is typical, once well-recognized companies select a new development the project is validated, and other companies tend to follow. Currently, the development is home to over 5,000,000 SF of buildings, including a 2,000,000 SF warehouse occupied by Ross and a 1,800,000 SF warehouse occupied by Target.

The continued maturation of the area's industrial market and the push by commercial and residential development into southern Madera will likely result in new industrial development due to the City and County's embrace of employment-generating projects along the Hwy. 41 and Hwy. 99 corridors.

Current Market Trends

The market for industrial real estate has been incredibly active over the last five years. The rapid changes in consumer expectations for expedited package delivery super-charged by the COVID lockdowns, dramatically altered the pace of new industrial development in the United States.

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Locally, we have seen many more companies consider this region due to high costs in other California markets and the benefits, like overnight delivery via ground services (i.e., UPS and FedEx) to virtually the entire state of California, associated with operating in this area. And, many of these requirements have been much larger than was typical over the last 20 years.

A unique aspect to some of these large requirements has been the need for large (50 to 100 acres) "shovel-ready" or "near shovel-ready" sites. Amazon and ULTA, which selected sites in Fresno over the last few years for 855,000 SF and 670,000 SF warehouses, respectively, had their buildings constructed to the companies' specifications. Both companies could not occupy existing buildings since neither met their needs. So, each company sought land that was near Highway 99, close to potential employees and entitled for large industrial buildings. At the time of their searches (I represented Amazon and their preferred developer and represented the seller of the land to Amazon and ULTA), there were only three viable alternatives.

Since Amazon and ULTA selected Fresno there has been an increase in inquiries from other companies looking for sites for 500,000+ SF buildings in the Central Valley. Numerous project requirements have evaluated the center of the state for new facilities, especially since the pandemic-related resetting of supply chains. As noted in many industry publications and by industry experts, risks related to low inventory levels, the need to accelerate delivery of goods to customers and the efficiencies gained from modern warehouses has caused an unprecedented demand for new, more functional logistics /warehouse space.

In the last few years, the following significant projects have located in the region:

- Amazon has opened five new warehouses in the area, including two buildings over 1M SF in Visalia and 470,000 SF warehouse in Fresno
- Autozone selected Chowchilla for a 500,000+ SF warehouse
- ACE Hardware opened a 1M SF warehouse in Visalia

Reyes Holdings, which is a bottler for Coke, is building a 200,000+ SF warehouse in the Plan Area after a lengthy project approval that was initially opposed by members of the City Council even though the site was zoned appropriately and was adjacent to other industrial buildings.

More recently, after a multi-year approval process and many Council meetings, the City of Fresno approved a 800,000+/- SF multi-building development on a former cotton storage site in southwest Fresno. This project was the epitome of all the challenges associated with industrial development in the City of Fresno – multi-year project-level EIR, opposition by Council members, opposition by third-party advocacy groups, near fatal opposition by labor and numerous delays in public hearings. It is a testament to the desirability of locating near the largest labor pool, excellent transportation infrastructure and anticipated future demand, that the developer of this project stayed committed so long.

As a result of the current trends and the lack of alternative sites in the center of California that can accommodate large projects for sale or lease, I think that if the City of Fresno can reduce

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entitlement risk and make more land available for industrial development, it is possible that these kinds of projects will once again seriously consider locating in the City.

An additional recent trend has been the need to plan for increased electrical service for new buildings due to mandatory charging locations for personal and commercial electric vehicles (EV's) and all the equipment inside the buildings (e.g., forklifts, HVAC, manufacturing lines, robotics, etc.) being electrified. For example, as recently as ten years ago, a 150,000 SF warehouse would be planned with a 2,000 AMP/480V service. Now, a developer will plan for that same building to have 3,000 – 4,000 AMPS/480V, which is a 50% to 100% increase.

The State has enacted numerous regulatory changes to force the rapid transition from internal combustion engines (ICE) to EVs and this necessitates that substantially more electrical service is needed to accommodate both charging and the operations of the occupants of a building. Some cities, including Fresno, have imposed infrastructure demands for EVs above and beyond those required by the State.

At times there have been conflicts between the State's and the City's requirements as they pertain to the minimum number of pre-planned charging locations. The consequence of the local mandates is that developers of buildings have to allocate more power to EVs, which leaves less for operations. To address this shortage of power, developers have begun to request "above-standard" electrical service from the onset. Utilities will generally only approve building plans with "above-standard" electrical needs if a customer can validate their need. So, there is a conflict for speculative development – the anticipated need for more power, but the inability to prove that it is needed when submitting construction plans. Many utilities are understandably concerned about how the rapidly increasing demands placed on their systems due to electrification may cause reliability issues for all customers in their service area.

To further complicate matters, there has been a push to force developers to agree to conditions of development that include requirements by the building's occupant(s) to operate non-ICE/EV fleets. Developers have no control over their tenant's operations, so these types of mitigations materially increase the risk of development. Further, most industrial businesses also do not have control over the vehicles coming and going from their facilities.

As a result of these rapid changes, developers are seeking municipalities that do not impose onerous EV mandates that exceed those of the State.

Conclusion

Site selection is as much about picking a location as it is about eliminating a location. When companies and developers evaluate markets, they quickly hone in on places that can support their business requirements. More often than not, cities and counties are competing and very rarely are two sites identical so decisions must be made using key criteria that may be unique to each company or developer. However, if a site cannot be entitled in a timely manner or presents

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too many regulatory restrictions and requirements, the site will not likely be identified as a viable location to pursue.

The more hurdles a developer or end user must clear to construct a building and the longer it will take to occupy a building, the lower the probability a site will be selected since it is probable that another site in another community can accommodate the project.

The City of Fresno does not exist in a vacuum, so if the recommendations contained in the Draft EIR were to be approved, it is likely that new industrial development in the City of Fresno will come to a standstill and new projects and the tax revenue that comes with new construction and new employment will migrate to other nearby communities.

Regards,

Ethan Smith, SIOR, CCIM
Senior Vice President
Industrial Division
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Enclosure

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Ethan Smith
SIOR, CCIM

Senior Vice President
Industrial Division

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CA RE Lic. #01395349

YEARS OF EXPERIENCE

21

AREAS OF SPECIALTY

Industrial Properties

Marketing

Contract Negotiation

Purchase & Sale Analysis

Landlord Representation

Tenant Representation

Seller Representation

Buyer Representation

Property Valuation

Public Speaking

Ethan H. Smith, SIOR, CCIM began his commercial real estate career in 2003. He is a Senior Vice President at Pearson Commercial specializing in industrial properties.

In 1994, Ethan graduated from the University of Texas at Austin, and began his career in sales with E & J Gallo Winery where he sold multiple product lines and introduced numerous new products to a variety of retail channels. In 1996, Ethan transitioned to advertising at DDB Worldwide (the largest global marketing communications firm) where he was accountable for and managed the Agency's multi-million-dollar relationships with clients, including American Airlines, Interstate Batteries, Pepsi, and Frito-Lay. While at DDB, Ethan focused on integrated sales promotions as well as relationship marketing. Ethan left Dallas in 1999 to help start PeoplePC in San Francisco where he was responsible for customer marketing programs in addition to being part of the early-stage management team. Ethan helped oversee the growth of the marketing department and the expansion of the company into Europe and Asia. In 2001, Ethan moved to iPrint Technologies where he was responsible for the company's acquisition and retention marketing programs.

Ethan has a wide variety of marketing experiences from which to draw as an Industrial Specialist at Newmark Pearson Commercial to better serve his clients.

Professional & Community Affiliations

Ethan is an active community and industry leader with memberships and honors that include:

- Pearson Commercial's "2004 Rookie of The Year"
- Top Producer (2011-Present)
- Pearson Realty Shareholder
- Society of Industrial and Office Realtors (SIOR)
- Certified Commercial Investment Member (CCIM)
- Newmark Industrial Specialty Council
- SIOR Northern California Chapter, Board of Directors
- Fresno Chaffee Zoo Corporation, Board of Directors
- INVEST Fresno, Chairman of the Board of Directors

Partial List of Sale Transactions

- 202,000 SF Class "A" warehouse, Fresno, CA - $16,050,000
- 44 acres for Amazon delivery station, Fresno, CA - $7,650,000
- 20 acres for industrial development, Fresno, CA - $3,195,000
- 38 improved light industrial lots, Clovis, CA - $7,000,000
- 790,000 SF Class "A" multi-building warehouse portfolio – Visalia, CA - $33,500,000
- 72 acres for Amazon fulfillment center – Fresno, CA - $12,000,000
- 115,000 SF office/warehouse – Fresno, CA - $3,800,000
- 200,000 SF food processing facility – Dinuba, CA - $10,600,000
- 150,000 SF warehouse – Fresno, CA - $7,800,000
- 187,000 SF rail-served warehouse – Fresno, CA - $3,600,00

Ethan Smith

- 23,000 SF cold storage and freezer facility, Fresno, CA - $1,750,000
- Clovis Winery, Clovis, CA - $5,000,000
- 90 acres of vacant land Selma, CA - $4,500,000
- 60 acres of vacant land, Fresno, CA – $3,900,000
- Dry Creek Business Park Clovis, CA - $2,500,000
- 220,000 SF manufacturing facility, Fresno, CA - $2,250,000

Partial List of Lease Transactions

- 250,000 SF Class “A” warehouse, Visalia, CA - $8,000,000
- 470,000 SF Class “A” warehouse, Fresno, CA - $41,000,000
- 63,000 SF Class “A” warehouse, Fresno, CA - $3,500,000
- 63,000 SF Class “A” warehouse, Fresno, CA - $4,900,000
- 202,000 SF Class “A” warehouse, Fresno, CA $12,200,000
- 118,000 SF Class “A” temp.-controlled warehouse, Visalia, CA - $3,300,000
- 106,000 SF warehouse, Fresno, CA - $2,600,000
- 121,000 SF Class “A” warehouse space, Fresno, CA - $8,900,000
- 258,000 SF Class “A” warehouse – Visalia, CA - $5,800,000
- 86,000 SF Class “A” warehouse for back office, Fresno, CA - $15,000,000
- 125,000 SF lease for food processing use, Fresno, CA – $3,200,000
- 360,000 SF Class “A” warehouse, Fresno, CA - $7,000,000
- 110,000 SF Class “A” warehouse build-to-suit, Fresno, CA - $7,000,000

Partial Client List

- G3 Development
- Amazon.com
- Seefried Industrial Properties | Development
- LKQ Corporation
- City of Fresno
- County of Fresno
- ZDI, Inc
- Cossette Development

Education

- Bachelor of Business Administration in Marketing from The University of Texas at Austin, with concentrations in Finance and Philosophy.

ATTACHMENT “B”

Semi-Annual Research & Forecast Report

Central California

Industrial | 2023 Q3 & Q4

Colliers

Central CA

Industrial 23Q3-Q4

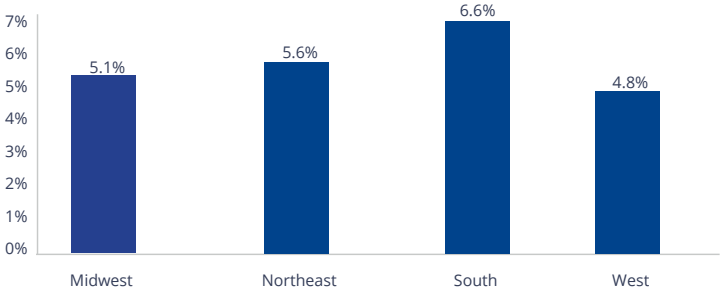
Key Takeaways

- National Average Industrial Vacancy increased to 5.5%
- 230.6 million square feet net absorption in 2023, less than half of the square footage absorbed in 2022
- 80 million square feet of construction starts in the second half of 2023; 447.3 million square feet currently under construction total

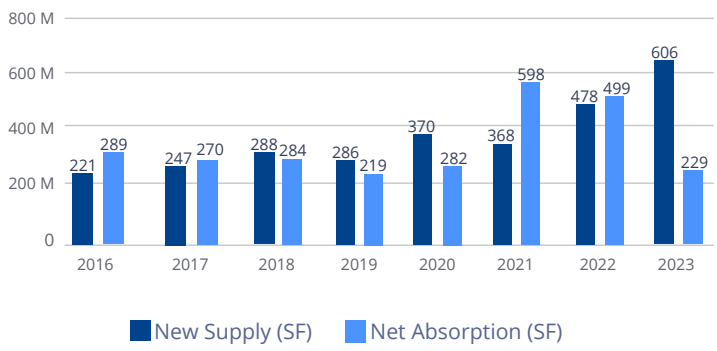
National Industrial Market Overview

It is indisputable that industrial real estate continued its slowdown in the second half of 2023. Absorption was nearly a third of new supply, leading to a considerable number of new buildings delivering vacant – and sitting vacant - as opposed to the preleasing we'd all grown accustomed to. Vacancy has climbed, moderating rent growth which (along with the cost of capital and pushback against warehouse development) has substantially slowed construction starts. Colliers is predicting that national vacancy stabilizes around 6.6% - actually a healthy number that gives tenants options. Although the data reflecting the slowdown feels severe, the statistics compare favorably to pre-pandemic levels. And while there are real challenges (costs, labor, raw material suppliers, uncooperative foreign governments), the volume of projects exploring locations in North America suggests that companies are seriously considering near-shoring manufacturing operations from overseas. The hope is that 2024 will see interest rates begin to fall, allowing for the general flow of commerce, and maybe even construction, to pick back up.

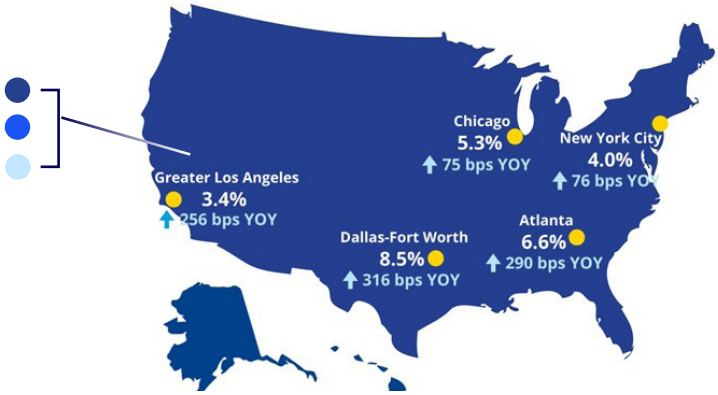
Vacancy by Region



U.S. Industrial Market Historical New Supply & Net Absorption (square feet)



Top 5 Largest U.S. Metro Industrial Markets
Vacancy Rates relative to our Markets



- Fresno/Clovis 1.8%
- Tulare/Kings 2.72%
- Madera/Merced 2.08%
- Los Angeles 3.4%
- Dallas 8.5%
- Chicago 5.3%
- Atlanta 6.6%
- New York 4.0%

Lease Rates (per square foot, per month)

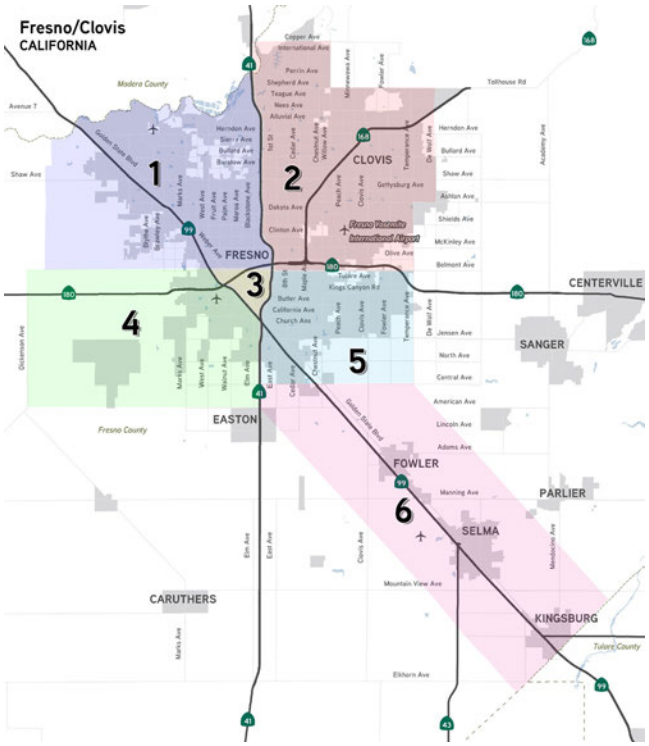
$1.37 ↑ San Francisco Bay Area	$1.60 ↓ Greater Los Angeles	$1.45 ↑ New York City Metro
$0.77 ↑ Houston	$0.92 ↑ Philadelphia	$0.67 ↓ Dallas / Fort Worth
$0.55 ↓ Detroit	$0.57 ↑ Chicago	$0.70 ↑ Altanta

Data from Craig Hurvitz, Colliers National Director of Industrial Research

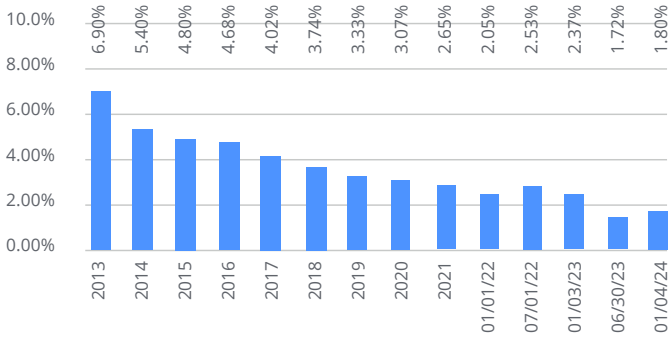
Fresno - Clovis, CA

Scannell's four building spec development at the corner of Marks and Nielsen Avenues received long awaited approval for its draft environmental impact report from Fresno's city council on February 22nd. While more approvals are required before construction can begin, this is welcome progress for a project that has been delayed for months by union attempts to negotiate a labor agreement. The site's longtime industrial zoning, surrounding industrial uses, and location approximately a third of a mile from access to Highway 180 make it a logical location to add needed warehouse square footage to Fresno. The developer estimates that the project will generate as many as 1,000 long term jobs in addition to the estimated 1,000 jobs associated with construction.

While tenant and buyer demand has slowed here as it has around the rest of the country, the lack of supply has mostly maintained pricing and vacancy rates.



Local Historic Vacancy Factor



Fresno/Clovis Metro Area - Fresno/Clovis metro area is divided into six submarkets

1. Northwest Fresno
2. Northeast Fresno
3. Downtown Fresno
4. Southwest Fresno
5. Southeast Fresno
6. South Fresno Hwy 99 Corridor

Blue = 3,000 - 19,999 SF
Grey = 20,000 SF+

Submarket Comparisons as of January 4, 2024

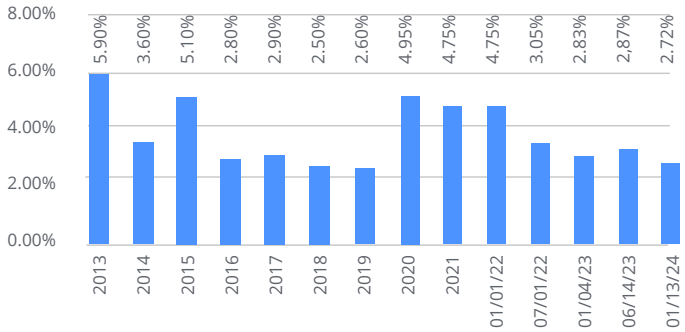
Submarket	Area	Total Inventory Sq. Ft. / # Buildings	Vacant & Available SF / Vacant & Available %	# Tracked Lease Transactions / Average Base Rent Per SF	# Properties for Lease / # Properties for Sale (>3,000 SF)	Under Construction Building SF / # Buildings	Proposed Construction Building SF / # Buildings
Northwest	1	5,147,056 / 587 5,941,984 / 129	108,684 / 2.112% 208,595 / 3.511%	11 / $0.99 5 / $0.65	17 / 6 5 / 2	0 / 0 0 / 0	34,450 / 3 101,790 / 5
Northeast	2	5,798,583 / 694 8,966,993 / 143	82,456 / 1.422% 22,631 / 0.252%	24 / $0.88 7 / $0.75	12 / 1 1 / 3	104,623 / 11 0 / 0	414,845 / 56 249,004 / 3
Downtown	3	1,127,122 / 109 1,917,495 / 42	45,345 / 4.023% 52,390 / 2.732%	1 / $0.62 0 / NA	4 / 1 2 / 0	0 / 0 0 / 0	0 / 0 0 / 0
Southwest	4	785,861 / 91 4,161,279 / 53	18,810 / 2.394% 214,500 / 5.15%	1 / $0.70 0 / NA	1 / 0 1 / 0	0 / 0 0 / 0	0 / 0 1,384,780 / 5
Southeast	5	3,768,587 / 390 26,521,912 / 298	153,620 / 4.076% 374,965 / 1.414%	2 / $0.77 4 / $0.70	14 / 5 9 / 4	0 / 0 333,295 / 3	0 / 0 1,452,660 / 6
South Hwy 99 Corridor	6	1,430,240 / 155 7,064,581 / 82	28,460 / 1.990% 0 / 0.00%	3 / $1.35 1 / $0.66	3 / 7 0 / 2	20,900 / 2 20,000 / 1	0 / 0 891,000 / 2
Totals / Weighted Averages		**18,057,449 / 2,026** 54,574,244 / 747	**437,375 / 2.42%** 873,081 / 1.60%	**42 / $0.89** 17 / $0.70	**51 / 24** 18 / 11	**125,523 / 13** 353,295 / 4	**449,295 / 59** 4,079,234 / 21

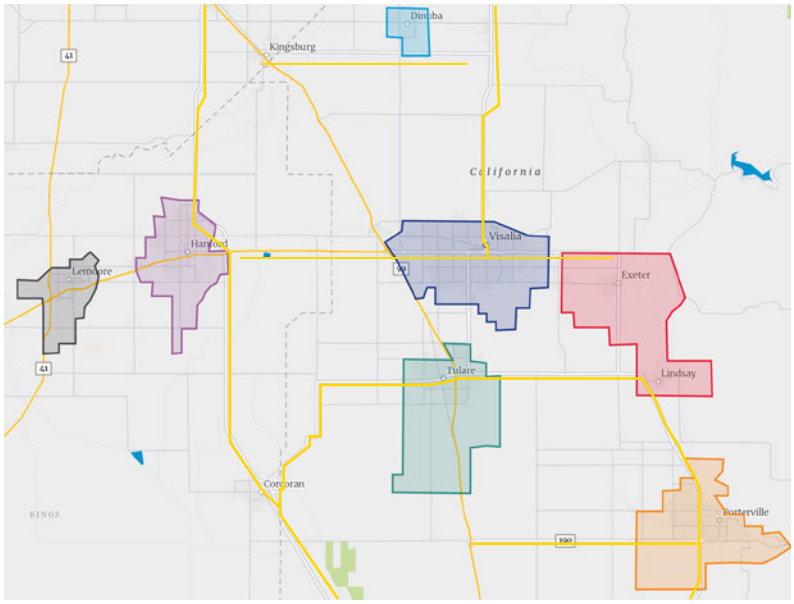
Tulare - Kings Counties

The largest single building under construction from Merced to Tulare is Cap Rock's ±1.2M SF development at its Central Point park on the north side of Visalia. Long rumored to be tied to Amazon (following in the footsteps of the two Cap Rock buildings across Plaza Drive), it's recently been reported that there is no deal in place and the building is being developed spec. If that is in fact true, the interest level from tenants will be telling as there hasn't been a space of this size available in the area maybe ever. If this project wasn't enough to hammer home Visalia's lead as the development capital of Central California, 2023 represented the fifth consecutive year of over 1 million square feet of commercial space constructed, most of it industrial.

In Kings County People's California, an Orange County based cannabis company, closed on approximately 137 acres on the south side of Lemoore last fall. The land will be used for outdoor cultivation, adding to the city's growing presence in the cannabis industry.

Local Historic Vacancy Factor





Blue = 3,000 - 19,999 SF
Grey = 20,000 SF+

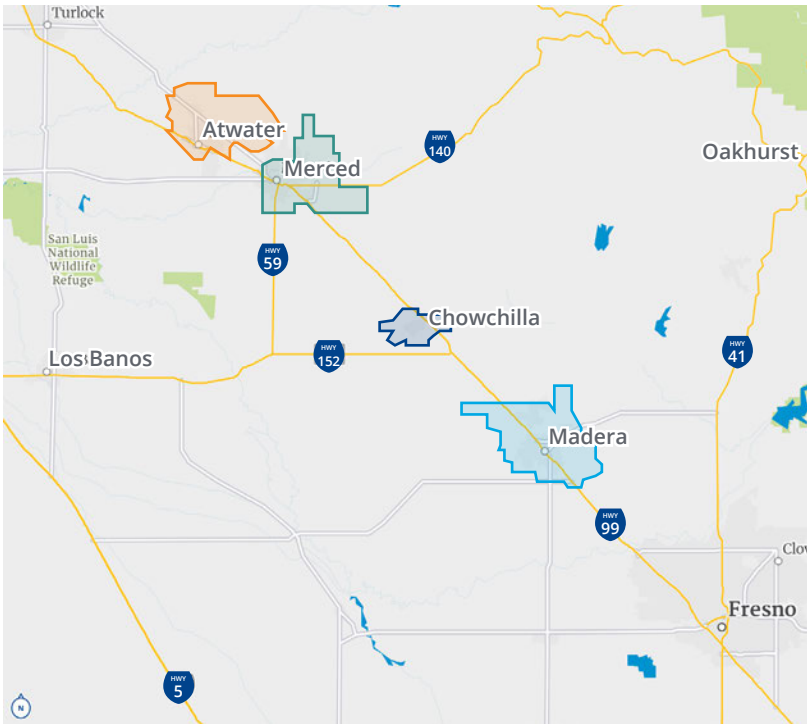
Submarket Comparisons as of January 13, 2024

Submarket	Area	Total Inventory Sq. Ft. / # Buildings	Vacant & Available SF / Vacant & Available %	# Tracked Lease Transactions / Average Base Rent Per SF	# Properties for Lease / # Properties for Sale (>3,000 SF)	Under Construction Building SF / # Buildings	Proposed Construction Building SF / # Buildings
Visalia	1	3,4,84,947 / 497 17,287,826 / 156	83,626 / 2.400% 321,290 / 1.858%	6 / $0.81 2 / $0.78	11 / 3 5 / 1	18,000 / 1 1,492,831 / 3	0 / 0 10,265,248 / 22
Tulare	2	1,348,624 / 177 4,393,146 / 41	35,288 / 2.617% 25,122 / 0.572%	6 / $0.79 0 / NA	5 / 3 1 / 1	0 / 0 594,077 / 2	0 / 0 2,897,503 / 4
Porterville	3	539,621 / 73 2,480,030 / 22	25,342 / 4.696% 50,400 / 2.032%	0 / NA 0 / NA	5 / 2 1 / 0	0 / 0 0 / 0	0 / 0 0 / 0
Dinuba	4	181,806 / 17 2,390,388 / 19	0 / 0.00% 0 / 0.00%	0 / NA 0 / NA	0 / 0 0 / 2	0 / 0 0 / 0	0 / 0 0 / 0
Famersville/Exeter/ Lindsay	5	449,334 / 53 3,144,400 / 34	22,201 / 4.941% 355,000 / 11.290%	0 / NA 0 / NA	3 / 3 1 / 2	0 / 0 0 / 0	0 / 0 0 / 0
Outlying Tulare County	6	267,932 / 30 3,140,233 / 38	0 / 0.00% 279,000 / 8.885%	0 / NA 0 / NA	0 / 1 2 / 1	0 / 0 0 / 0	35,000 / 4 0 / 0
Hanford	7	838,137 / 89 5,405,495 / 22	15,500 / 1.849% 70,368 / 1.302%	0 / NA 3 / $0.40	2 / 0 1 / 0	0 / 0 0 / 0	0 / 0 0 / 0
Lemoore	8	118,046 / 15 1,649,846 / 17	0 / 0.000% 0 / 0.000%	0 / NA 0 / NA	0 / 0 0 / 2	0 / 0 0 / 0	0 / 0 0 / 0
Totals / Weighted Averages		**7,228,447 / 951** 339,891,364 / 349	**181,957 / 2.52%** 1,101,180 / 2.76%	**12 / $0.80** 5 / $0.55	**26 / 12** 11 / 9	**18,000 / 1** 2,086,908 / 5	**35,000 / 4** 13,162,751 / 26
		47,119,811 / 1,300	**2.72%**	**$0.72**			

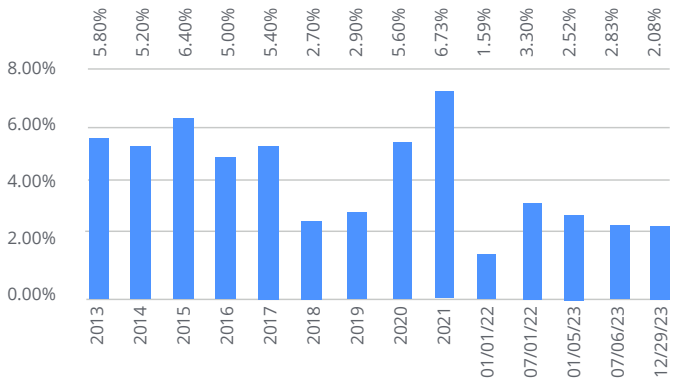
Merced - Madera Counties

Madera County's industrial momentum remains positive despite the apparent death of a long whispered Avenue 7 mega distribution project. Auto Zone continues construction on its Chowchilla site. Amond World has begun construction on its second building, and Evapco is working on an expansion of its Almond Avenue facility. SPAN is underway with an approximately 50,000 square foot spec concrete tilt up in Freedom Industrial Park. And the Madera Industrial Whse multitenant buildings have gotten off to a good start – the small spaces are approximately 75% leased to a variety of small businesses on a trajectory to be fully occupied sometime later this year.

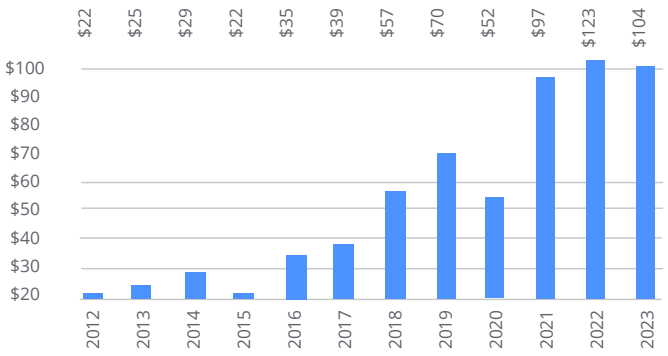
In Merced, Industrial Realty Group (IRG) closed escrow in December on the former Quad Graphics building at 2201 Cooper Avenue (±500,000 square foot building on ±42 acres). IRG and its brokers are now on the hunt for possible tenants. While this large empty space will spike the vacancy rate (not reflected in the data on this page as it was not on the market when the numbers were calculated), the landlord (and city of Merced) have a unique site to lure any sizable requirements that might consider the area (particularly of the manufacturing nature).



Local Historic Vacancy Factor



Local Historic Sale Price PSF



Blue = 3,000 - 19,999 SF
Grey = 20,000 SF+

Submarket Comparisons as of December 29, 2023

Submarket	Total Inventory Sq. Ft. / # Buildings	Vacant Available SF / Vacant Available %	# Tracked Lease Transactions / Average Base Rent Per SF	# Properties for Lease / # Properties for Sale (>3,000 SF)	Under Construction Building SF / # Buildings	Proposed Construction Building SF / # Buildings
Atwater/Merced	1,835,892 / 210 5,678,167 / 88	78,040 / 4.251% 224,228 / 3.949%	4 / $0.79 1 / $0.25	12 / 3 5 / 5	0 / 0 0 / 0	0 / 0 20,200 / 1
Madera/Chowchilla/ Oakhurst	1,406,993 / 154 8,650,160 / 110	62,920 / 4.472% 0 / 0.00%	4 / $0.85 14 / $0.63	24 / 0 0 / 0	0 / 0 790,000 / 3	0 / 0 3,700,000 / 4
Totals/Weighted Averages	**3,242,885 / 364** 14,328,327 / 198	**140,960 / 4.35%** 224,228 / 1.56%	**8 / $0.82** 15 / $0.59	**36 / 3** 5 / 5	**0 / 0** 790,000 / 3	**0 / 0** 3,720,200 / 5
	17,571,212 / 562	2.08%	$0.67			

Featured Listings

3630 E. Wawona Ave., #103
Fresno, CA

Size:	±19,200 SF
Office:	±1,656 SF
Dock Positions:	4
Clear Height:	27’
Zoning:	M-3C (County of Fresno)
Asking Rent:	$0.70 PSF/month/NNN
NNNs:	$0.09 PSF/month

Notes:
Clean space in dock high building. Property is rail served with an active spur. Spacious yard offers plenty of room to maneuver trucks. Access to Highway 99 via Central Avenue.

4545 N. Marty Avenue
Fresno, CA

Size:	±12,000 SF
Office:	±3,514 SF
Parcel:	±1.1 acre
Roll Up Doors:	4 (12’ x 12’)
Clear Height:	16’ - 19’
Power:	800 amp
Exterior Dock:	Yes
Zoning:	Industrial Light (City of Fresno)
Asking Rent:	$0.85 PSF/month/NNN

Notes:
Single tenant building in good condition with frontage on Marty Avenue. Fenced yard has multiple gates for circulation. Exterior dock.

Market Sample Lease/Sale Activity

Notable Lease Transactions	Size	Lease Rate	Transaction Type
1. 5877 E. Brown Avenue, Frenso	±14,400	$0.75 PSF	New Lease
2. 1200 Airport Drive, Chowchilla	±89,560 SF	$0.45 PSF	New Lease
3. 1810 Grogan Avenue, Merced	±104,560 SF	$0.25 PSF	New Lease
4. 9938 W. Legacy Avenue, Visalia	±7,581 SF	$0.86 PSF	New Lease

Notable Sale Transactions	Total Size	Total Acreage	Sale Price	PSF
5. 5826 E. Brown Avenue, Fresno	±4,926 SF	±0.45	$730,000	$148.19
6. 704 N. Lavern Avenue, Fresno	±102,750 SF	±8.72	$18,280,000	$177.91
7. 1954 S. Anna Street, Fresno	±47,750 SF	±1.20	$8,500,000	$178.01
8. 5213 E. Pine Avenue, Fresno	±23,010 SF	±2.05	$2,781,000	$120.86
9. 2201 Cooper Avenue, Merced	±507,038 SF	±42.64	$20,000,000	$39.44

At Colliers, we are **enterprising**

66
countries

$4.3B
in annual revenue

$98B
assets under management

46,000
sale and lease transactions

2B
square feet under management

19,000
professionals

Number of countries includes affiliates.

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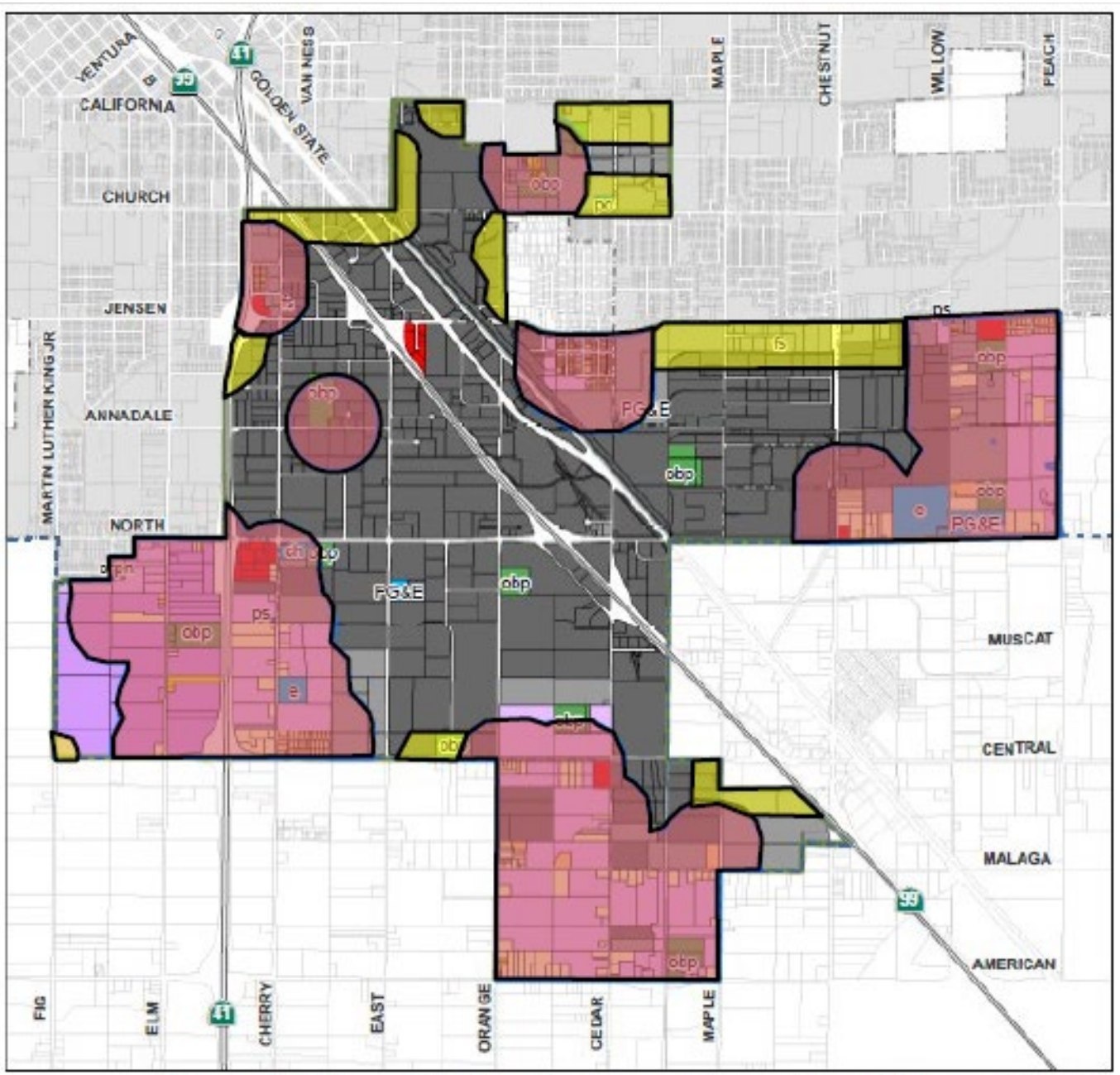
ATTACHMENT “C”



Legend

Figure 5-2: Specific Plan Proposed Planned Land Use and Buffer

ATTACHMENT “D”

Central California

Industrial

23Q1-Q2

Semi-Annual Research & Forecast Report

Accelerating success.

Colliers

Central CA Industrial

23Q1-Q2

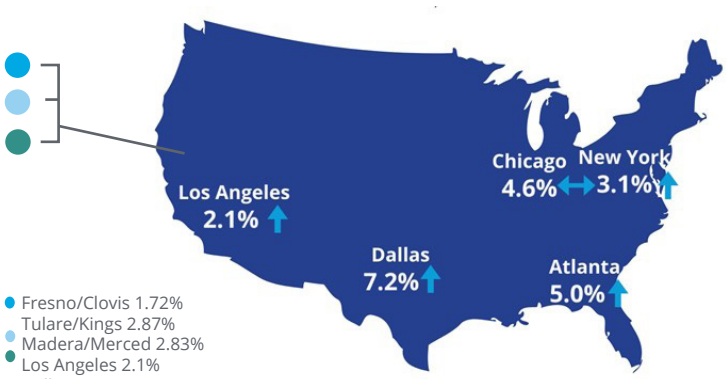
Key Takeaways

- National average industrial vacancy rose to 4.5%
- 118.1 million square feet net absorption in Q1 & Q2 2023, approximately 50% less than the second half of 2022
- Greater Los Angeles posted negative absorption
- 593 million square feet under construction

National Industrial Market Overview

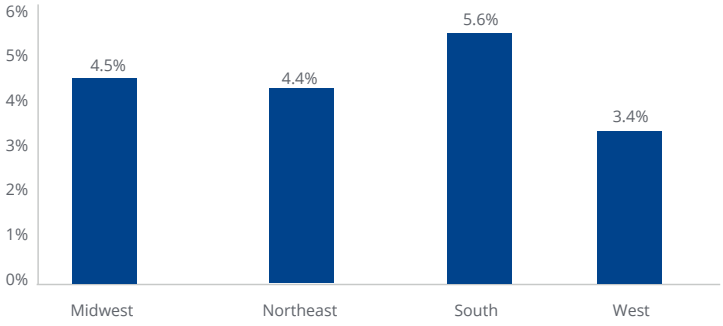
While distressed warehouse properties and vacancy remain low across the country and rents are as high as they've ever been (fueled by leases of new buildings), for the first time in several years industrial real estate has encountered speed bumps to its record run. The spigot of large capital market transactions was almost completely turned off for the first half of the year, to the point that most major real estate brokerage firms have reported losses on earning calls. While tenant requirements have not vanished, the feverish demand of the last few years has noticeably cooled as a consequence of a slowing economy, reduced factory output, and mostly normalizing supply chains. While markets with limited construction are still well positioned to enjoy continued success, landlords in those with millions and millions of new square footage, often purchased at record high land prices with expensive development costs, are likely experiencing heartburn as they wonder if their buildings will lease at rents that support their investments.

Top 5 Largest U.S. Metro Industrial Markets Vacancy Rates relative to our Markets



- Fresno/Clovis 1.72%
- Tulare/Kings 2.87%
- Madera/Merced 2.83%
- Los Angeles 2.1%
- Dallas 7.2%
- Chicago 4.6%
- Atlanta 5.0%
- New York 3.1%

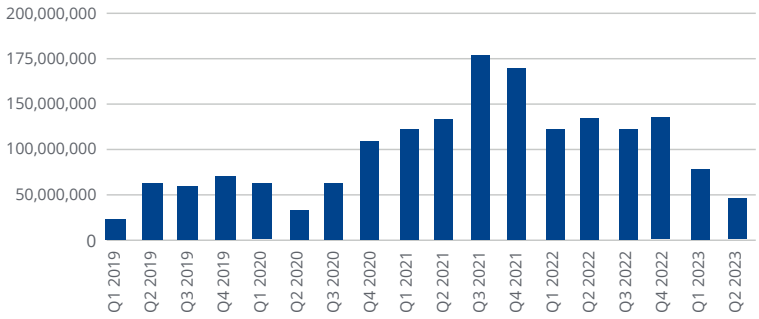
Vacancy by Region



Lease Rates (per square foot, per month)

$1.27 ↑ San Francisco Bay Area	$1.74 ↑ Greater Los Angeles	$1.36 ↑ New York City Metro
$0.73 ↔ Houston	$0.89 ↑ Philadelphia	$0.67 ↑ Dallas / Fort Worth
$0.55 ↑ Detroit	$0.55 ↑ Chicago	$0.67 ↑ Altanta

U.S. Industrial Market Historical Net Absorption (square feet)

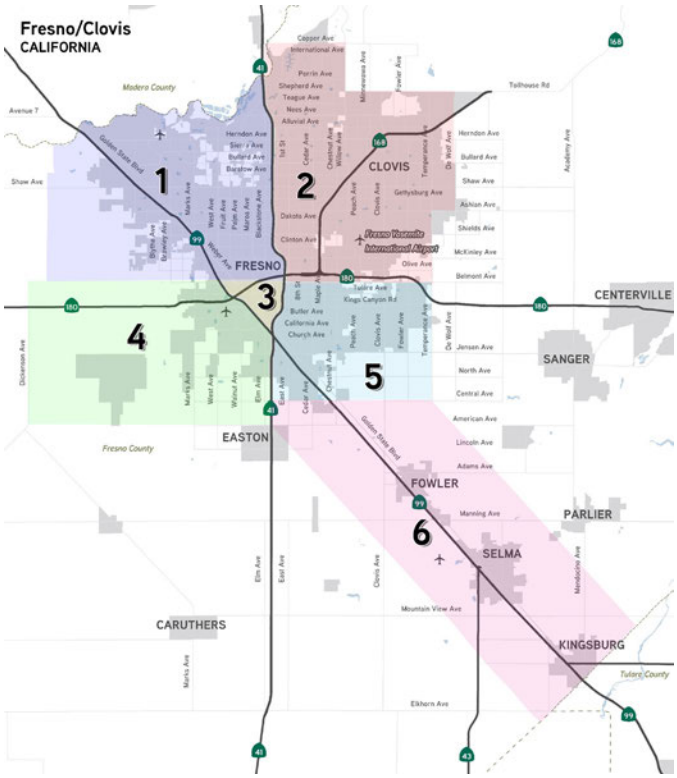


Data from Steig Seaward, Colliers Senior Director of National Research

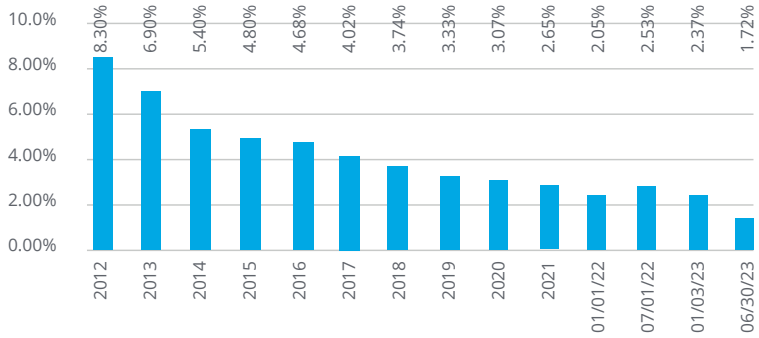
Fresno - Clovis, CA

Active industial tenants and buyers were less plentiful in the first half of 2023 relative to the previous few years, but for the most part pricing has been unaffected due to a persistent lack of available properties. Market sale transactions were down in particular, with the exception of the several smaller buildings that sold in the Three Crowns Industrial Park on the south side of Fresno. While the pace has slowed, quality available space has continued to transact, and the market still generally favors landlords over tenants although the advantage feels slightly less pronounced. Anecodotally, we've heard of many tenants expressing the desire to renew leases verus move, and landlords content to have them stay (at or near market rents).

With very little empty new supply delivering, we do not expect substantial change in vacancy or pricing in the second half of 2023.



Local Historic Vacancy Factor



Fresno/Clovis Metro Area - Fresno/Clovis metro area is divided into six submarkets

1. Northwest Fresno
2. Northeast Fresno
3. Downtown Fresno
4. Southwest Fresno
5. Southeast Fresno
6. South Fresno Hwy 99 Corridor

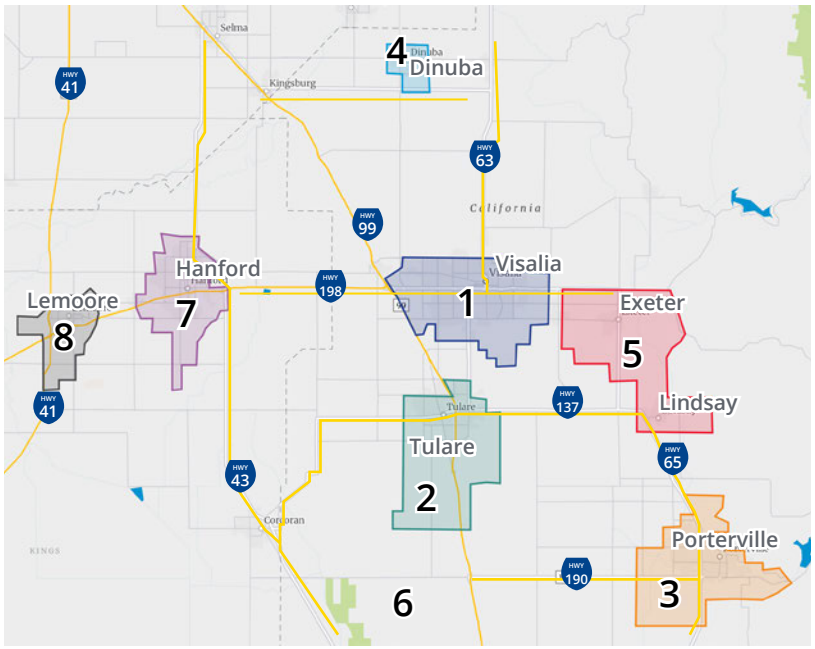
Blue = 3,000 - 19,999 SF
Grey = 20,000 SF+

Submarket Comparisons as of June 30, 2023

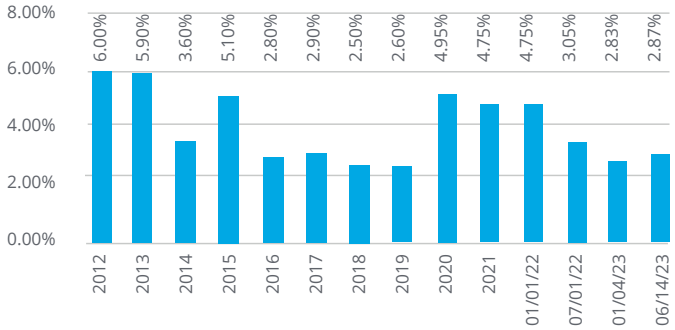
Submarket	Area	Total Inventory Sq. Ft. / # Buildings	Vacant & Available SF / Vacant & Available %	# Tracked Lease Transactions / Average Base Rent Per SF	# Properties for Lease / # Properties for Sale (>3,000 SF)	Under Construction Building SF / # Buildings	Proposed Construction Building SF / # Buildings
Northwest	1	5,141,655 / 590 5,939,743 / 129	82,017 / 1.595% 94,700 / 1.594%	12 / $0.92 17 / $0.90	9 / 5 3 / 2	0 / 0 0 / 0	34,450 / 3 101,790 / 5
Northeast	2	5,753,411 / 700 8,977,034 / 143	101,858/ 1.770% 0 / 0.000%	14 / $0.87 4 / $0.92	12 / 4 0 / 2	104,623 / 11 0 / 0	414,845 / 56 249,004 / 3
Downtown	3	1,122,459 / 111 2,024,761 / 43	26,200 / 2.334% 106,140 / 5.242%	0 / $0.00 NA / NA	3 / 0 2 / 0	0 / 0 0 / 0	0 / 0 0 / 0
Southwest	4	781,861 / 90 4,161,279 / 53	0 / 0.000% 214,500 / 5.15%	0 / $0.00 0 / NA	0 / 0 1 / 0	0 / 0 0 / 0	0 / 0 1,384,780 / 5
Southeast	5	3,814,219 / 408 26,721,013 / 296	42,238 / 1.107% 529,048 / 1.980%	3 / $1.11 5 / $0.58	5 / 8 13 / 5	0 / 0 256,550 / 3	0 / 0 1,554,090 / 7
South Hwy 99 Corridor	6	1,403,333 / 153 6,777,562 / 83	28,360 / 2.021% 24,175 / 0.357%	2 / $1.35 2 / $0.65	4 / 10 1 / 2	14,900 / 2 20,000 /	6,000 / 1 648,000 / 1
Totals / Weighted Averages		**18,016,938 / 2,052** 54,601,392 / 747	**280,673 / 1.56%** 968,563 / 1.77%	**31 / $0.94** 28 / $0.83	**33 / 27** 20 / 11	119,523 / 13 276,550 / 4	455,295 / 60 3,937,664 / 21
		72,618,330 / 2,799	**1.72%**	**$0.89**			

Tulare - Kings Counties

CA Ventures is well under construction with the first phase of its 99 Central Logistics Center in Tulare, which is a ±544,077 square foot concrete tilt up. Visalia has a few smaller buildings under construction as well as two approximately 100,000 square foot buildings between American Industrial Park and Hwy 99, along with a project in Woodlake, but construction remains muted otherwise. Several sites with large proposed buildings are continuing through the entitlement process however, at least a few have communicated that they plan to build speculatively, but that remains to be seen. Despite weakening demand, vacancy currently remains very low across Tulare and Kings counties.



Local Historic Vacancy Factor



Submarket Comparisons as of June 14, 2023

Blue = 3,000 - 19,999 SF
Grey = 20,000 SF+

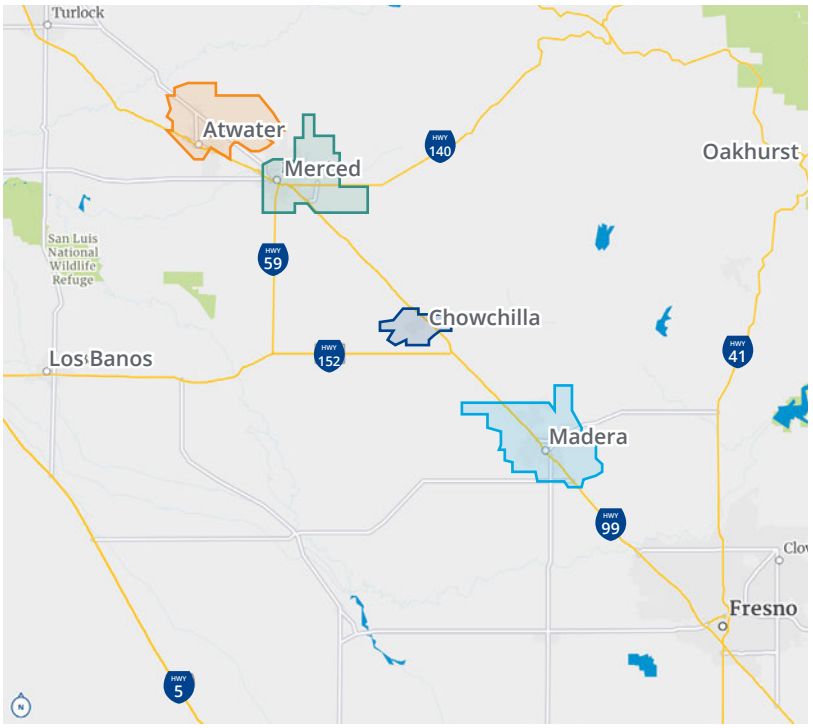
Submarket	Area	Total Inventory Sq. Ft. / # Buildings	(>3,000 SF) Vacant & Available SF / Vacant & Available %	# Tracked Lease Transactions / Average Base Rent Per SF	# Properties for Lease / # Properties for Sale (>3,000 SF)	Under Construction Building SF / # Buildings	Proposed Construction Building SF / # Buildings
Visalia	1	3,467,108 / 494 17,179,972 / 153	54,251 / 1.565% 518,090 / 3.016%	7 / $0.84 4 / $0.75	8 / 4 6 / 2	24,081 / 2 210,000 / 2	0 / 0 11,586,352 / 23
Tulare	2	1,366,732 / 182 4,248,054 / 41	31,290 / 2.289% 25,122 / 0.591%	1 / $1.13 1 / $0.85	3 / 0 1 / 1	0 / 0 594,077 / 2	0 / 0 1,797,503 / 3
Porterville	3	553,621 / 80 2,480,030 / 22	21,182 / 3.826% 50,400 / 2.032%	1 / $0.51 0 / NA	2 / 2 1 / 0	0 / 0 0 / 0	0 / 0 0 / 0
Dinuba	4	184,306 / 18 2,361,863 / 18	0 / 0.00% 0 / 0.00%	0 / NA 0 / NA	0 / 0 0 / 1	0 / 0 0 / 0	0 / 0 0 / 0
Famersville/Exeter/ Lindsay	5	449,334 / 53 3,176,044 / 33	32,801 / 7.300% 355,000 / 11.177%	0 / NA 0 / NA	1 / 1 1 / 3	0 / 0 0 / 0	0 / 0 0 / 0
Outlying Tulare County	6	627,185 / 76 5,839,728 / 66	10,000 / 1.594% 214,000 / 3.665%	0 / NA 0 / NA	1 / 3 1 / 2	0 / 0 0 / 0	35,000 / 4 0 / 0
Hanford	7	849,446 / 93 5,377,495 / 22	5,500 / 0.647% 70,368 / 1.309%	3 / $0.39 0 / NA	1 / 0 1 / 0	0 / 0 0 / 0	0 / 0 0 / 0
Lemoore	8	123,504 / 17 1,527,460 / 16	40,897 / 33.144% 0 / 0.000%	0 / NA 0 / NA	11 / 23 0 / 1	0 / 0 0 / 0	0 / 0 0 / 0
Totals / Weighted Averages		**7,621,236 / 1,013** 42,190,646 / 371	**195,921 / 2.57%** 1,232,980 / 2.92%	**12 / $0.72** 5 / $0.77	**27 / 33** 11 / 10	24,081 / 2 804,077 / 7	35,000 / 4 13,383,855 / 26
		49,811,882 / 1,384	**2.87%**	**$0.74**			

Merced - Madera Counties

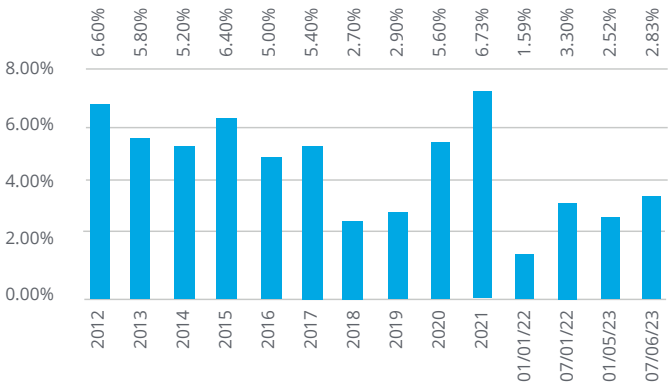
It was announced in July that Merced County has been awarded at $49.6 million grant to build out Castle Commerce Center's inland port. The grant will be used to improve existing rail capacity by installing new rail lines, utilities, and asphalt in a 70 acre section of Castle to facilitate the construction of transload warehouses by private developers, among other items. Merced County is proud to be home to the only inland port in California selected to receive such a grant, and hopeful that the continued improvement of the site will promote the area's growth as an industrial hub in central California.

In a positive sign for both the industrial market and the city of Merced, the over 500,000 square foot former Quad Graphics facility received several offers when it was put up for sale and is currently in escrow.

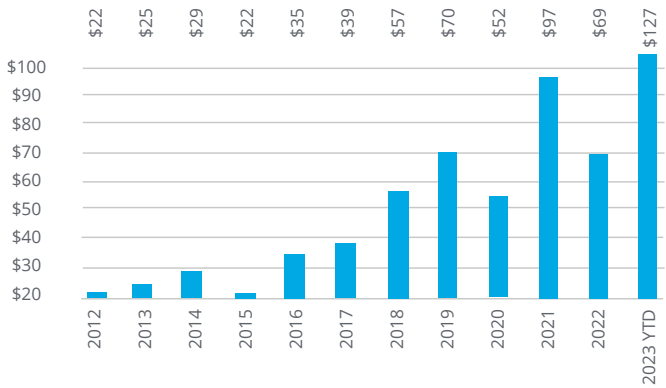
In Chowchilla, Auto Zone's approximately 500,000 square foot distribution center is well under construction, while Madera County's vacancy is almost exclusively limited to the new Madera Industrial WSHE multitenant buildings.



Local Historic Vacancy Factor



Local Historic Sale Price PSF



Submarket Comparisons as of July 6, 2023

Blue = 3,000 - 19,999 SF
Grey = 20,000 SF+

Submarket	Total Inventory Sq. Ft. / # Buildings	Vacant Available SF / Vacant Available %	# Tracked Lease Transactions / Average Base Rent Per SF	# Properties for Lease / # Properties for Sale (>3,000 SF)	Under Construction Building SF / # Buildings	Proposed Construction Building SF / # Buildings
Atwater/Merced	1,842,918 / 222 5,669,879 / 88	56,701 / 3.077% 244,228 / 4.307%	5 / $0.70 2 / $0.49	8 / 2 6 / 3	0 / 0 0 / 0	0 / 0 20,200 / 1
Madera/Chowchilla/ Oakhurst	1,379,014 / 156 8,403,032 / 109	99,090 / 7.186% 89,000 / 1.059%	2 / $0.81 16 / $0.60	43 / 0 0 / 2	0 / 0 750,000 / 2	0 / 0 3,700,000 / 4
Totals/Weighted Averages	**3,221,932 / 378** 14,072,911 / 197	**155,791 / 4.84%** 333,228 / 2.37%	**7 / $0.73** 18 / $0.53	**51 / 2** 7 / 5	0 / 0 750,000 / 2	0 / 0 3,720,200 / 5
	17,294,843 / 575	**2.83%**	**$0.59**			

Featured Listings

355 S. Vineland Road
Bakersfield, CA

Size: ±317.29 acres

Notes:
Agricultural land well located for future development as Bakersfield continues to grow east, situated in a transitional area along Edison Highway and State Highway 58 in Bakersfield, California. Currently planted with approximately 116 acres of citrus trees. A portion of the parcel is designated for industrial use in the General Plan.

Asking Price:

$14,190,000

2660 S. Golden State Blvd.
Fresno, CA

Building Size:	±12,300 SF
Warehouse:	±8,670 SF
Office:	±1,830 SF
Shop:	±1,800 SF
Site Size:	±4.12 acres (±1.33 unpaved)
Dock Doors:	21

Notes:
Very well-maintained cross dock available for lease. Paved portion of yard has recently been resealed and painted. Very good access to Highway 99. Located just south of Fresno in City of Fowler.

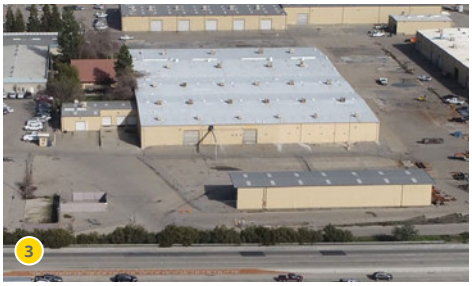
Lease Rate:

$25,000/mo., NNN

Sample Lease/Sale Activity

Notable Lease Transactions	Size	Tenant	Transaction Type
1. 5451 W. Mission Avenue, Fresno	±8,750 SF	$0.65 PSF	New Lease
2. 2474 N. Miami Avenue, Fresno	±4,791 SF	$0.65 PSF	New Lease
3. Selma Business Park, Selma	±31,634 SF	$0.31 PSF	New Lease
4. 5730 S. Mandarin Avenue, Fresno	±9,900 SF	$0.83 PSF	New Lease
5. 5186 N. Blythe Avenue, Fresno	±5,000 SF	$0.85 PSF	New Lease

Notable Sale Transactions	Total Size	Total Acreage	Sale Price	PSF
6. 361 N. Minnewawa Avenue, Clovis	±7,410 SF	±0.38	$1,145,000	$154.52
7. 2505 N. Shirk Avenue, Visalia	±35,465 SF	±5.00	$4,500,000	$126.89
8. 1433 Menlo Avenue, Clovis	±16,178 SF	±1.20	$1,550,000	$95.81
9. 8246 W. Mineral King Avenue, Visalia	±39,200 SF	±2.14	$4,400,000	$112.24



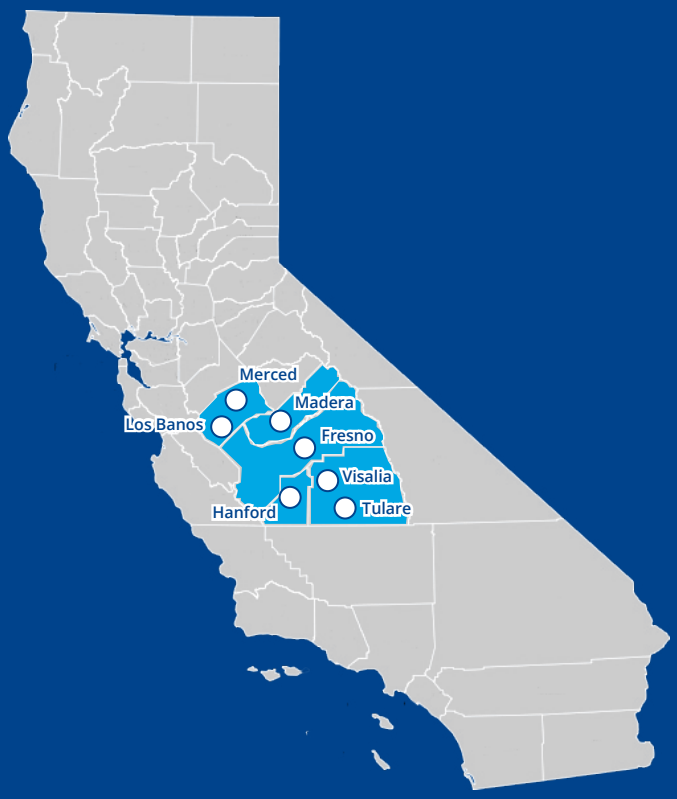
370 offices in 63 countries on 6 continents

United States: 113
Canada: 36
Latin America: 17
Asia Pacific: 35
EMEA: 76
ANZ: 25

$4.5B
in revenue

2B
square feet under management

17,000 +
professionals and staff



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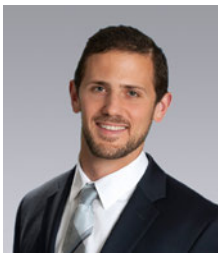

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October 17, 2022

VIA ELECTRONIC SUBMISSION AND UNITED STATES MAIL

Honorable Chair Liane Randolph
Honorable Board Members
CALIFORNIA AIR RESOURCES BOARD
c/o Clerk of the Board
1001 "I" Street
Sacramento, CA 95814

Re: Comments on Proposed Advanced Clean Fleets Regulation

Dear Chair Randolph and Members of the California Air Resources Board:

I am submitting the following comments on behalf of California Trucking Association ("CTA") and Western States Trucking Association ("WSTA") concerning the California Air Resources Board's ("CARB") proposed Advanced Clean Fleets Regulation (the "ACF Regulation"). For the reasons stated below, CTA and WSTA request that CARB decline to adopt the ACF Regulation, and instead consider the alternatives they have proposed.

In support of these comments, I have enclosed reports from the following experts concerning the potential negative unintended economic and environmental consequences of the proposed ACF Regulation: (i) Julia Lester and Varalakshmi Jayaram of Ramboll, and (ii) Sean Edgar of CleanFleets. (See Exhibits "A" and "B.")

I.

INTRODUCTION

CARB should decline to adopt the ACF Regulation at its October 27, 2022, meeting for several reasons. As an initial matter, the ACF Regulation would be preempted by state and federal law. The ACF Regulation runs directly afoul of the Federal Aviation Administration Authorization Act of 1994 (the "FAAAA"), Pub. L. No. 103-305 § 601(c), 108 Stat. 1569, 1606 (codified, as amended, at 49 U.S.C. § 14501(c)), which prohibits states from "enact[ing] or enforce[ing] a law, regulation, or other provision having the force and effect of law related to a price, route, or service of any motor carrier . . . with respect to the transportation of property." (49 U.S.C. § 14501, subd. (c)(1).) Here, the ACF Regulation directly affects and relates to the pricing, routes, and service of motor carriers.

The ACF Regulation is also preempted by Clean Air Act ("CAA") Section 209(a). Although California under some circumstances may obtain a preemption waiver from EPA, that is not the case here, as the ACF Regulation does not meet the requirements of CAA Section 209(b). The ACF Regulation contravenes multiple provisions of the CAA by, *inter alia*, establishing classes or categories of vehicles based on impermissible factors, failing to make the required technical determinations, failing to adequately consider the cost of compliance within each period, and declining to include an appropriate lead-time for compliance. The ACF Regulation is also inconsistent with the Clean Fuel Fleet Program included in Section 246 of the CAA.

The adoption of the ACF Regulation would also violate the California Administrative Procedures Act, Govt. Code, § 11340, *et seq.* (the "APA"). CARB's economic analysis is incomplete because it does not include numerous factors that are required to assess the true cost of ownership. The economic analysis also impermissibly rejects alternatives proposed by CTA, WSTA, and others, even though those alternatives would spare fleets from the massive economic impacts of the ACF Regulation, while at the same time achieving its core objectives.

CARB's environmental analysis in support of the ACF Regulation is also fundamentally flawed. For instance, the Environmental Analysis ("EA") quantifies the alleged emissions benefits of the ACF Regulation in detail. At the same time, the EA includes only a qualitative assessment of the potential air quality and greenhouse gas impacts of the ACF regulation, preventing an apples-to-apples comparison between benefits and negative impacts. Moreover, for those significant and unavoidable impacts, the EA fails to identify or adopt adequate mitigation under CEQA, instead speculating on what other agencies may or may not do to avoid potentially significant impacts.

The EA's assessment of specific resources is also incomplete. The EA contains no assessment of lifecycle emissions for electricity, declines to assess the increase in vehicle miles traveled, and fails to assess impacts to the reliability of California's electric grid. As with the economic impact analysis in the Initial Statement of Reasons ("ISOR"), that EA's alternatives

analysis is fundamentally flawed because the project objectives are drafted to narrowly, essentially foreclosing the adoption of any alternative that does not include the deployment of EVs.

In addition, CARB has not complied with Section 57004 of the Health & Safety Code because there is no evidence that CARB has sought peer review of the scientific portions of the ACF Regulation. Further, CARB should decline to adopt the ACF Regulation on the ground that it is inconsistent with the useful life provisions of Section 43021 of the Health & Safety Code.

For each of the foregoing reasons, CARB should reject the ACF Regulation. CARB should, instead, either take no action or alternatively consider one of the alternatives to the ACF Regulation that they have previously submitted.

II.

THE ACF REGULATION IS PREEMPTED BY STATE AND FEDERAL LAW

A. The ACF Regulation Would Be Preempted by Federal Law Prohibiting State Laws and Regulations that Relate to the Prices, Routes, or Services of any Motor Carrier

The proposed ACF Regulation—or anything resembling it—would run afoul of the preemption provision of the FAAAA. The FAAAA prohibits states from "enact[ing] or enforce[ing] a law, regulation, or other provision having the force and effect of law related to a price, route, or service of any motor carrier . . . with respect to the transportation of property." (49 U.S.C. § 14501, subd. (c)(1).) Congress enacted that provision to advance the strong federal policy favoring a trucking industry shaped primarily by competitive market forces, against a background of uniform federal regulation, which it began with economic deregulation at the federal level in the Motor Carrier Act of 1980, Pub. L. No. 96-296, 94 Stat. 793. In the wake of federal deregulation, it became clear that Congress could not achieve its goals as long as burdensome and inconsistent *state* regulation of the trucking industry persisted. Concluding that state regulation of the trucking industry "causes significant inefficiencies," "increase[s] costs, and "inhibit[s] . . . innovation and technology," Congress enacted the FAAAA's preemption provision to ensure that "national and regional [motor] carriers attempting to conduct a standard way of doing business" would not be hindered by "[t]he sheer diversity of [state] regulatory schemes." (H.R. Conf. Rep. No, 103-677 at 87.) As the Supreme Court has observed, the broad preemptive scope of the FAAAA preemption provision reflected the concern that "state requirements could easily lead to a patchwork of state service-determining laws, rules, and regulations," which would be "inconsistent with Congress' major legislative effort to leave such decisions, where federally unregulated, to the competitive marketplace." (*Rowe v. N.H. Motor Transp. Ass'n* (2008) 552 U.S. 364, 373.) The adoption of the ACF Regulation would represent a direct regulation of the trucking industry, with acute impacts on motor carrier prices, routes, and services, and would massively interfere with the Congressional policy favoring regulatory uniformity for the industry.

The ACF Regulation's impact on motor carrier prices is indisputable. The capital costs of a zero-emission tractor are projected to be 227% to 628% higher than a comparable conventional tractor.[1] In addition, the total cost of ownership of these vehicles may be significantly higher,[2] taking into account a variety of considerations, including the comparative costs of electricity or other alternative technologies as compared to diesel, as well as increased maintenance and support infrastructure costs, increased dwell, and lost payload. These costs—vehicle costs, fuel, and maintenance—represent as much as 46% of motor carriers' marginal costs. (See American Transportation Research Institute, An Analysis of the Operational Costs of Trucking: 2002 Update, at 20, *available at* https://truckingresearch.org/wp-content/uploads/2022/08/ATRI-Operational-Cost-of-Trucking-2022.pdf.) Thus, motor carriers cannot simply absorb these increased costs—the ACF Regulation would inevitably require motor carriers to upwardly adjust their prices accordingly.

With respect to motor carrier routes, the impact of the ACF Regulation would be at least as, if not more, significant. Conventional diesel tractor-trailers have an average range of approximately 500-800 miles dependent on fuel tank size. That, combined with the ubiquitous availability of diesel refueling facilities, means that for all intents and purposes motor carriers can run any legally-available route, with their choices dictated (as Congress intended) solely by efficiency and market considerations. Electric-powered tractor-trailers, by contrast, are expected to have a range of approximately 200-250 miles before requiring a recharge, and the necessary recharging facilities are comparatively non-existent. Motor carriers forced to operate electric vehicles will thus be directly restricted to the subset of legally available routes that have sufficient recharging facilities in sufficient density. For the foreseeable future, this will have a significant impact on motor carrier's choice of routes.

And for many motor carriers who have terminals strategically located at points along frequently-travelled routes that conventional trucks can reach on a single fueling, and who depend on that terminal network to route shipments from origin to destination, the ACF Regulation would wreak havoc on their routes. Such carriers would need to build additional terminal facilities in closer proximity to one another to account for the shorter range of electric trucks, and would have to engage in a wholesale reconfiguration of their routes accordingly.

Similar considerations mean that the ACF Regulation would drastically restrict the services motor carriers would be able to provide to their shipper customers. Federal law regulates the amount of time in a given day and week that a commercial driver can work. (See 49 C.F.R. § 395.3(a)(2) [limiting commercial drivers of property-carrying vehicles to a 14-hour period between coming on-duty and being relieved of duty for 10 consecutive hours]; *id.* § 395.3(b) (limiting cumulative duty hours to 60 per 7-day period or 70 per 8-day period).

[1] https://theicct.org/wp-content/uploads/2022/01/Final-Report-eTruck-Virtual-Teardown-Public-Version.pdf

[2] https://www.nrel.gov/docs/fy21osti/71796.pdf

Refueling or recharging a truck is typically an on-duty activity that consumes those available duty hours. Given that electric trucks will need to be recharged more frequently than conventional trucks, and given that it will take longer to recharge an electric truck than it does to refuel a conventional truck, the ACF Regulation will dictate that drivers spend a significantly smaller portion of their available duty time actually providing the service of moving freight. Indeed, given that electric trucks will likely need to be recharged on average 274 times a year compared to 75 refueling events of a conventional truck, and on average 105 minutes to recharge compared to 5 minutes to refuel, the ACF Regulation can be expected to consume an additional 480 hours of a driver's available yearly duty hours (and because, in reality, drivers do not typically work to the full limit of the federal duty hour restrictions, the impact on their productivity will be even higher).

In addition to this steep reduction in service productivity, the ACF Regulation would render flatly *impossible* some services that motor carriers are free to provide under federal rules, and which the marketplace regularly demands. For example, a motor carrier operating conventional trucks might be able to offer a time-sensitive shipper the service of moving a load 400 miles in an eight-hour window. However, a motor carrier operating an electric truck would not be able to do so, because the need for a lengthy recharge (or two) mid-trip would consume too much time to complete the delivery within the specified window. In other words, in addition to reducing the level of services motor carriers can provide across the board, in many specific instances it will as a practical matter prohibit some services altogether.

Each of these direct, significant impacts on motor carrier prices, routes and services would, standing alone, be sufficient to render the ACF Regulation preempted under the clear language of FAAAA. Additionally, these effects, individually and in combination, would represent a profound interference with the Congressional policy embodied in that statute; preventing motor carriers from adopting nationally uniform business practices shaped primarily by market forces rather than a patchwork of state-by-state policy preferences. (See, e.g., *Am. Airlines v. Wolens* (1995) 513 U.S. 219, 229 n.5 [applying equivalent preemption provision of the Airline Deregulation Act and observing that Congress's "overarching deregulatory purpose" means that "States may not seek to impose their own public policies . . . on the operation of a . . . carrier"] [internal quotation marks omitted].)

B. The ACF Regulation Is Preempted by the Clean Air Act

1. The ACF Regulation Cannot Be Implemented Unless and Until EPA Grants a Waiver of Preemption Under Section 209(b)

CAA section 209(a) preempts states from adopting or attempting to enforce "any standard relating to the control of emissions from new motor vehicles . . . ." (CAA § 7453(a) [otherwise known as section "209(a)"]; see also *Engine Mfrs. Ass'n v. S. Coast Air Quality Mgmt. Dist*. (2004) 541 U.S. 246 ("*EMA*")].) This prohibition against state-level regulation of new mobile source emissions is both "categorical" and expansive. (*EMA*, 541 U.S. at 252-53). Because the ACF Regulation requires fleet operators to purchase ZEVs, it constitutes a standard

relating to motor vehicle emissions and is preempted under CAA section 209(a) unless and until EPA grants a waiver under section 209(b). Until this occurs, CARB cannot implement or enforce the ACF regulation. EPA has historically taken well over two years to act on California's waiver requests.[3] Most recently, CARB submitted its request for a waiver associated with Advanced Clean Trucks and associated regulations on October 22, 2021, which remains pending approximately one year later. While ACF requires fleet owners to comply beginning January 1, 2024, CARB cannot implement or enforce the regulation in the absence of a waiver.

Nor can CARB avoid the requirement of a waiver by characterizing the ACF regulation as an "in-use" standard. Section 209(d) provides that states have the right "to control, regulate, or restrict the use, operation, or movement of registered or licensed motor vehicles." These "in-use" controls extend to measures such as "carpool lanes, restrictions on car use in downtown areas, and programs to control extended idling of vehicles," (*Pacific Merchant Shipping Ass'n v. Goldstene* (2008) 517 F.3d 1108, 1115), and "[i]nspection and maintenance programs." (*In re Volkswagen* (N.D. Cal. 2017) 264 F. Supp, 3d 1040, 1051.) CARB has previously relied on the exemption for "in-use" regulations to circumvent the need for a waiver, for example, in developing the Truck and Bus Rule. But the Truck and Bus Rule did not mandate the purchase of particular types of vehicles; as an in-use requirement, it allowed operators the flexibility to retrofit, purchase newer used vehicles, or entirely new vehicles. (California Air Resources Board, Initial Statement of Reasons, Truck and Bus Rule, p. 40 (October 2008).) The ACF Regulation makes no such provisions, and instead seeks to achieve its primary aim of limiting all new purchases to ZEVs. (ACF Regulation, § 2015.1(a).) As the Supreme Court has already established, such a mandate is an emissions standard which is preempted in the absence of a waiver. (See *EMA*, 541 U.S. at 255.) CARB may not enforce the ACF regulation unless and until such waiver is granted and, as discussed below, EPA is prohibited from granting the waiver.

2. EPA Cannot Grant a Waiver Because the ACF Regulation Does Not Meet the Requirements in CAA Section 209(b)

Though EPA can grant waivers from the preemptive effect of CAA section 209(a), it must make particular findings in order to do so. Under CAA section 209(b), EPA may only grant a waiver if EPA finds (i) the State's determination that the rule will be at least as health protective as federal rules is not arbitrary and capricious, (ii) the State needs such standards to meet compelling and extraordinary conditions, and (iii) the State standards and accompanying enforcement procedures are consistent with section 202(a). Because EPA cannot make these findings, it cannot grant a waiver of preemption under CAA section 209(b) for the ACF Regulation.

[3] 82 Fed. Reg. 6500 (Jan. 19, 2017) (waiver request submitted on May 28, 2014; approved January 19, 2017, two years and 7 months after submittal); 81 Fed. Reg. 78144 (Nov. 7, 2016) (approval of waiver request submitted February 12, 2014, two years, eight months later).

a. The ACF Regulation Contravenes Multiple Provisions of CAA Section 202(a)

The ACF Regulation Establishes Classes or Categories of Vehicles Based on Inappropriate Factors. CAA section 202(a)(3)(A)(ii) requires that, "[i]n establishing classes or categories of vehicles or engines for purposes of regulations under this paragraph, the Administrator may base such classes or categories on gross vehicle weight, horsepower, type of fuel used, *or other appropriate factors*" (emphasis added). The ACF Regulation does not utilize appropriate factors to develop classes or categories of new motor vehicles or new motor vehicles engines as required by this section.

When applying this section, EPA generally categorizes vehicles by class into Light Duty (Class 1-2), Medium Duty (Class 3-6), and Heavy Duty (Class 7-8). EPA defines vehicle categories, also by Gross Vehicle Weight Rating ("GVWR"), for the purposes of emissions and fuel economy certification, such as Class 2 (trucks with a GVWR of 6,001-10,000 lbs.) or Class 8 (heavy-duty trucks with GVWR over 33,001 lbs.). EPA has also adopted classes or categories based on the vehicle's primary function, frontal area, special features, or capacity. (See, e.g., 40 C.F.R. §§ 86.1803-01.) In every case, the class or category is defined by factors intrinsic to the vehicle itself. EPA previously rejected a proposal to treat vehicles as different classes based on method of manufacture because to do so would result in a different class for a vehicle with "exactly the same function and market" as an existing category. (81 Fed. Reg. 73478, 73518-19 (Oct. 25, 2016).)

That is exactly what CARB proposes to do here. The ACF Regulation creates sub-categories of normal classes which means that vehicles with "exactly the same function and market" may be subject to the ACF Regulation in some instances, but not in others. This sub-categorizing by CARB to create standards which vary in their applicability to the same vehicle is not based on appropriate factors under CAA section 202(a).

The ACF Regulation applies to "any entity that owns, operates, of directs one or more vehicles in California that is either:

(1) an entity or combination of entities operating under common ownership or control that have $50 million or more in total gross revenue in the prior year;

(2) is a fleet owner that owns, operates, or directs 50 or more vehicles in the total fleet, excluding light-duty package delivery vehicles;

(3) is a fleet owner or controlling party whose fleet in combination with other fleets operated under common ownership and control total 50 or more vehicles in the total fleet, excluding light-duty package delivery vehicles; or

(4) is any federal government agency.

(ACF Regulation, § 2015(a)(1).)

Under the ACF Regulation, the same truck (as characterized by EPA) would have a different standard to comply with (1) whether operated in a fleet greater than 50 trucks or a fleet less than 50 trucks, or (2) whether operated in a fleet with an entity with greater than $50 million revenue or less than $50 million revenue. CARB has provided no explanation as to how vehicles require different emissions classifications merely as a function of their ownership. There is nothing in the emissions or operations of the selected vehicles that necessitates sub-classifications with different emissions standards.

In addition, the ACF Regulation's definitions of "controlling party" and "common ownership or control" create unreasonable and incoherent classes or categories of vehicles regulated separately under the ACF. Under the ACF Regulation, common ownership or control means being owned or managed on a day-to-day basis by the same person or entity and includes "vehicles owned by different entities but operated using common or shared resources to manage the day-to-day operations using the same motor carrier number, *displaying the same name or logo*, or contractors whose services are under the day-to-day control of the hiring entity are under common ownership or control" (emphasis added). This means that, for example, sprinter vans provided by a third party who services an online retailer could count as under common control by the retailer only in certain instances. The online retailer may have to count vans with their logo on them as part of their fleet, but if the vans do not have the retailer's logo, they may not count as part of the retailer's "fleet" for purposes of the ACF Regulation. The online retailer is not the operator of the fleet in either instance, but the regulation considers some vans to be part of the retailer's "fleet" because the retailer is the "controlling party." (See ACF Regulation, § 2015(b) ["Controlling party" means the motor carrier, broker, or entity that directs or otherwise manages the day-to-day operation of one or more fleets under common ownership or control to serve its customers or clients].)

In this instance, CARB is not regulating the vehicle itself nor even the owner or operator of the van, but the client the van serves and is treating vehicles with the same function as different for purposes of emission control standards.[4] In comparison, any vehicle emission standard promulgated by EPA under the CAA would apply to the vehicle itself, regardless of how it is used or by whom. The ACF Regulation's complicated determination of which vehicles are regulated and which are not thus conflicts with the CAA section 202 requirement that the determination of classes or categories to be regulated under the section are based on appropriate factors.

[4] EPA has promulgated its own definitions of "ownership" and "control" applicable to a purchase standard implemented as part of an authorized Clean Fuel Fleet Program, discussed *infra*, with which the ACF is also inconsistent. (40 C.F.R. § 88.302-94.)

The ACF Regulation Does Not Make the Required Technological Determinations. CAA section 202(a)(3)(A)(i) requires the EPA to adopt vehicle emission standards which represent "[t]he greatest degree of emission reduction achievable *through the application of technology which the Administrator determines will be available for the model year to which such standards apply*, giving appropriate consideration to cost, energy, and safety factors associated with the application of such technology" (emphasis added). This analysis requires EPA to complete an exhaustive process in which it assesses the technologies that will be available in each model year in order to determine the emission reductions that are achievable each year. (See, e.g., EPA, Final Rule for Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards, 86 Fed. Reg. 74434, 74473-488 (Dec. 30, 2021) [assessing technical feasibility of final standards including projected target levels by manufacturer, projected per vehicle cost for each manufacturer, projections of EV and PHEV technology penetration rates, and explaining why the final standards are technologically feasible]; see also EPA, Revised 2023 and Later Model Year Light-Duty Vehicle GHG Emissions Standards: Regulatory Impact Analysis, Chapter 2: Technology Feasibility, Effectiveness, Costs, and Lead-Time.)[5]

Instead of following this required section 202 process, CARB has inverted it. Rather than complete a full assessment of the technologies that will be available in each model year in order to determine the emissions reductions achievable in that year, CARB has picked an emission level (zero-emission) and then told fleet operators that they have to comply with that level regardless of technology or commercial availability. By allowing for ZEV unavailability exemptions, daily usage exemptions, and vehicle delivery delay extensions, (ACF Regulation, § 2015.3), CARB has admitted that it has not undertaken the analysis required by section 202 to determine in advance which technologies will be available for each class or category of vehicles in each model year. This analysis is the cornerstone of any vehicle emission standard. If neither CARB nor EPA has completed a thorough assessment of the various options for compliance in each model year, how are fleets supposed to understand what technologies are available for compliance and plan accordingly? By failing to complete this analysis, CARB has rendered the ACF Regulation unable to qualify for a waiver of preemption.

Nowhere in the 296-page ISOR does CARB conduct a thorough technological assessment of vehicles available in each model year for which the ACF Regulation will apply. CARB explains that "[i]t is somewhat challenging to precisely predict which ZE technologies fleets would use for complying with the proposed ACF regulation." (ISOR at 171.) CARB frames its lack of analysis as "flexibility," forcing covered owners to make their own determination as to what technology is available at the time of compliance subject to CARB's review. (ISOR at 100, 269.) CARB takes itself off the hook by mandating that regulated parties themselves prove which vehicles are commercially unavailable and then petition CARB. (ACF Regulation, § 2015.3(e).) For the ZEV unavailability exemption, CARB states that it will maintain a list of vehicle configurations that are eligible for the exemption on the CARB

[5] https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1013ORN.pdf

Advanced Clean Fleets webpage, *i.e.*, vehicles that are commercially unavailable. However, no such list exists. Appendix J to the ISOR is a list of commercially available ZEVs as of 2022, however, the ISOR states that Appendix J is only "a partial list of medium- and heavy-duty ZEVs that are currently available or that can be ordered" and is not the list of commercially *unavailable* vehicles that the ISOR says CARB will produce. In crafting the ACF Regulation in this way, CARB has turned the required technological assessment into an individual assessment of various regulated parties' statements about which vehicles are or are not commercially available, rather than the class by class assessment that CARB is required to undertaken pursuant to section 202(a).

Moreover, CARB has defined commercially available to mean a vehicle that is available to order or has had at least one model delivered to a customer. (ISOR at 9-10, 70, 91, 93, 98.) Commercially available typically means a technology is available for purchase within a reasonable time and at an ordinary commercial price. It is clear that many of the vehicles CARB has listed on Appendix J are open for order but are not being delivered in a reasonable time or at the amount ordered. During the rulemaking process, many commenters reported about orders which were decreased in volume or for which they waited extreme amounts of time to receive their vehicles. This does not amount to being commercially available. CARB has also repeatedly emphasized the nuanced requirements for specialized fleets, (ISOR at 91, 98), yet has not and cannot ensure that the technology the ACF Regulation will require is commercially available for all regulated entities. (ISOR at 171-72 [admitting that BEVs have not yet proven functional for fleets with high range or high payload needs, but not discussing what technology will be available to address those needs as ACF standards begin to apply to those uses]; see also *id.* [discussing the mix of ZEVs CARB assumes for purposes of the economic analysis and stating that there are currently "limited small-scale deployments of fuel cell electric truck tractors by several small and major truck manufacturers" and "fuel cell electric technologies leading to commercialization in the latter half of the decade," yet also assuming that FCEVs will be 10% of the fleet until 2027 and 25% afterwards].)

The ACF Regulation Does Not Give Appropriate Consideration to the Cost of Compliance Within Each Period. CAA section 202(a)(2) and (a)(3)(A)(i) requires that, in adopting vehicle emission standards, EPA give appropriate consideration to the cost of compliance *within each period*. Given that, as discussed above, CARB does not actually identify the technology with which specific classes or categories of vehicles will comply with the rule, it is not possible for CARB to have undertaken an analysis of the actual cost of compliance during each period that the ACF Regulation will apply. In fact, the various compliance options (Model Year Schedule and ZEV Milestone Option) and the multiple exemptions from rule applicability (ZEV unavailability, daily mileage usage, infrastructure construction delay, and vehicle delivery delay) make it impossible to assess the cost of compliance within each period. The Department of Finance also noted the uncertainty in whether and how certain regulated parties would comply with the ACF Regulation in its comments on the Standard Regulatory Impact Assessment ("SRIA"). Appendix C-2: Department of Finance Comment Letter, pp. 1-2 (stating that the SRIA assumes that the purchase requirements of the ACF regulation will complement the sales requirements in the Advanced Clean Trucks regulation, but noting that differences in timing

between the ACF Regulation and Advanced Clean Trucks may hinder compliance of fleets that utilize heavier vehicle classes and asking that the SRIA include a sensitivity analysis to analyze this issue). CARB did not revise the SRIA as requested but merely responded that "CARB staff believe the assumptions staff made are appropriate . . . ." (Appendix C-3: Summary and Response to Department of Finance SRIA at 2.)

In addition, CARB's SRIA looks not at the cost of compliance within each period based on determined methods of compliance, but at the macroeconomic costs of the ACF Regulation as a whole across the state compared to baseline operations. (ISOR at 157-58.) Further, major changes were made to the proposed ACF Regulation after CARB completed its SRIA. (*Id.* at 159-60.) As explained in the ISOR, CARB's SRIA modeling assumed that high priority fleets would comply solely through meeting the ZEV milestone requirements. However, in the proposed regulation, high priority fleets by default must meet the Model Year Schedule, but may opt-in to the ZEV Milestone Option if they waive their useful life rights (see discussion above). For this reason, the SRIA cannot accurately predict the cost of compliance within each period as required by section 202(a).

CARB has identified numerous cost-barriers to ACF implementation, including high vehicle upfront costs and the real concern that ZEVs will not be able to replace existing combustion-powered vehicles on a one-to-one basis due to payload, mileage, or other issues. (ISOR at 200 [stating that "higher upfront cost of ZEVs can place a barrier in vehicle purchasing patterns" and that ZEVs can meet *most* daily needs on a one-to-one basis provided the ZEV is placed in applications where it is suitable].) Yet CARB conveniently ignores these real challenges in its SRIA. This economic analysis is not sufficient to meet the demands of section 202(a).

The ACF Regulation Does Not Meet the Lead Time Requirement. CAA section 202(a)(3)(C) provides, "Any standard promulgated or revised under this paragraph and *applicable to classes or categories of heavy-duty vehicles or engines* shall apply for a period of no less than 3 model years beginning no earlier than the model year commencing 4 years after such revised standard is promulgated" (emphasis added). These Congressionally-mandated lead time and stability periods allow individual truck manufacturers to make the capital investments necessary to respond to new regulations. Congress determined that these lead times and stability provisions were essential to successful implementation of the CAA's technology-forcing objectives.

Here, the ACF Regulation is slated to be adopted in spring 2023. To comply with the lead time provisions, the regulation cannot apply before model year 2028. Under the Model Year Schedule option for the high priority/federal fleets and for drayage fleets, the regulation would take effect in 2024, requiring the purchase of only ZEVs starting on January 1, 2024. (ACF Regulation, § 2015.1.) This directly contravenes section 202(a). In addition, the fleet ZEV Milestone Option requires 10 percent of a fleet's vehicles to be ZEVs in 2025 for milestone group 1 and 10 percent of a fleet's vehicles to be ZEVs in 2027 for milestone group 2. (ACF

Regulation, § 2015.2.) Thus, the Milestone Option also directly contravenes the required 4-year lead time.

This conclusion is supported by federal case law and by EPA's own prior waiver determinations. Specifically, in *American Motors Corporation v. Blum* (D.C. Cir. 1979) 603 F.2d 978, the D.C. Circuit held that where Congress has specified a lead time period for certain types of mobile source regulations, CARB is bound to comply with that specified lead time just as much as EPA. If CARB fails to provide that congressionally mandated lead time, the CARB regulations are not consistent with CAA section 202(a) and thus are ineligible for a waiver of preemption under section 209(b). (*Id.*)

EPA consistently has followed the D.C. Circuit's reasoning in *Blum*, and has explicitly addressed the applicability of section 202(a)(3)(C) to California as a requirement to obtain a waiver under section 209(b). EPA issued a memorandum on September 16, 1994, signed by then-Assistant Administrator Mary Nichols that expressly concluded that CARB must comply with the Congressionally-mandated four-year lead time provision of section 202(a)(3)(C) in order for CARB's regulations to be consistent with CAA section 202(a) and to qualify for a waiver of preemption. (See Decision Document, Sept. 16, 1994, pp. 30, 32.)[6] EPA explained:

> EPA disagrees with CARB's conclusion [that *Blum* is not applicable to its heavy-duty regulations]. EPA believes that *Blum* indicates that California would be required to provide the statutory lead time required under section 202(a)(3)(C) for its proposed gasoline and diesel standards. . . .
>
> EPA believes this case to be similar to the facts in *Blum* in that Congress specified a specific amount of lead time to be provided for heavy-duty manufacturers. The Congressional concern for adequate lead time for manufacturers under certain conditions must be incorporated by California in determining the adequacy of lead time to permit the development of new technology to meet new requirements. . . .
>
> The *Blum* court concluded that . . . a Congressional mandate of a specific amount of lead time should be grafted into section 202(a) and that the California standards may not be inconsistent with this required lead time. Given that *Blum* decision, EPA believes that the heavy-duty lead time requirement, already a part of section 202(a), should be provided in order for California standards to be considered consistent with section 202(a).

(*Id.* at 26, 28, 29-30 [emphasis added]; see also 46 Fed. Reg. 22032 (April 15, 1981) [holding by EPA that when Congress has specified a lead time period, California "must make provision for the extra lead time Congress itself found necessary"].)

[6] *Available at* https://www.regulations.gov/document/EPA-HQ-OAR-2022-0332-0020

CARB has alleged in its Advanced Clean Trucks ("ACT") proceeding that "the lead-time provisions of section 202(a)(3)(C) of the CAA do not apply to the ACT regulation" because section 202(a)(3)(C) only applies to standards "promulgated or revised under this paragraph [section 202(a) of the CAA]," that is, to standards promulgated by the EPA Administrator and not CARB. (CARB, Final Statement of Reasons, Advanced Clean Trucks Regulation ("ACT FSOR") at 107 (March 2021).) However, to grant a waiver of CAA section 209(a) preemption, EPA must find that CARB's regulation is consistent with section 202(a), including the lead time requirement. CARB argues that "[s]ince 1970, U.S. EPA has typically applied a "2-pronged" test of whether California standards are consistent with CAA section 202(a) as required by section 209(b)(1)(C). The standards must be: (1) technologically feasible in the lead time provided considering the cost of compliance, and (2) compatible with the federal test procedures so that a single vehicle could be subjected to both tests. No more should be required." (*Id.*) However, this is patently incorrect with respect to both the determination in *Blum* and the 1994 determination by EPA with a memorandum signed by then-Assistant Administrator Mary Nichols concluding that CARB must comply with the four-year lead time provision of section 202(a)(3)(C) in order for CARB's regulations to be consistent with CAA section 202(a) and to qualify for a waiver of preemption.

While CARB may wish to do whatever it pleases, under the guise of state law authority, neither case law nor previous EPA action support its incorrect view that it can adopt standards without regard to compliance with CAA section 202(a), and yet receive a waiver of preemption from EPA. Nor is there a need to conduct a tortured analysis of the CAA's legislative history to attempt to support CARB's incorrect view. (See ACT FSOR at 107 [attempting to argue that the legislative history of the CAA and its amendments support the fact that "it is unlikely Congress intended to apply the specific 4-year requirement to California"].) Federal statutes must be construed to give full effect to their plain meaning, and when statutes are unambiguous the plain language of the statute controls, without the need to explore any matters beyond the clear terms of the statute. (See *United States v. Barnes* (D.C. Cir. 2002) 295 F.3d 1354, 1359.)

Here, the relevant provisions of the CAA are clear and unambiguous. In order for CARB to receive a waiver for the ACF Regulation, those standards must be "consistent with section 7521(a) [202(a)]" of the CAA. Since the ACF Regulation establishes classes or categories of vehicles based on inappropriate factors, does not appropriately consider cost for compliance within each period, does not make the required technological determinations, and fails to provide the mandated four years of lead time, it is inconsistent with section 202(a), and thus ineligible for a waiver of federal preemption under CAA section 209(b)(1)(C).[7]

[7] Nor can CARB avoid its obligation by asserting that ACF Regulation is applicable only to owners and operators, not manufacturers. The Supreme Court readily saw through such a distinction in *EMA*. "A command, accompanied by sanctions, that certain purchasers may buy only vehicles with particular emission characteristics is as much an 'attempt to enforce' a 'standard' as a command, accompanied by sanctions, that a certain percentage of a manufacturer's sales volume must consist of such vehicles." (*EMA*, 541 U.S. at 255.)

b. The ACF Regulation Is Inconsistent With the Clean Fuel Fleet Program

The CAA both contemplates and commands that states impose purchase mandates to increase the proportion of clean fuel vehicles—but *only* in compliance with specific federal requirements. The ACF regulation has not been developed consistent with the CAA's substantive or procedural requirements. It is therefore preempted.

Section 246 of the Act (42 U.S.C. § 7586) created the Clean Fuel Fleet Program ("CFFP"), which covers vehicle acquisition decisions by individuals, corporations, and all levels of state government. The purchase requirements in section 246 apply to "covered fleets," which are broadly defined to mean "10 or more motor vehicles which are owned or operated by a single person." (42 U.S.C. § 7581(5).) "Person" sweeps within the regulation any "individual, corporation, partnership association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent, or employee thereof." (*Id.* at § 7602(e)). A program enacted through Section 246 would require a specified percentage of all new covered fleet vehicles to be clean-fuel vehicles, meeting the CAA's mandated emissions standards. (*Id.* at § 7586.) Notably, section 7585 prohibits EPA from enacting any standard applicable to heavy-duty vehicles of more than 26,000 GVWR. (*Id.* at § 7585(a).) Congress mandated states develop a purchase standard, and at the same time Congress exempted the heaviest vehicles from its requirements.

The Supreme Court in *EMA* explained that the CAA's CFFP prescribes "numerous detailed requirements" that must be complied with to avoid preemption. (541 U.S. at 254 n.6, 257-58.) Among other things, section 246 requires that States participating in the CFFP program submit their fleet regulation programs to EPA as SIP revisions, to ensure federal review and oversight. (42 U.S.C. 7586(a).) Section 246(b) additionally sets out specific phase-in requirements. (42 U.S.C. 7586(b).) Most importantly, section 246(d) requires States to give fleet operators the choice of what type of fuel to use and what type of vehicle to buy, so long as other congressionally specified requirements are met. (42 U.S.C. 7586(d).) As the Supreme Court explained, any fleet purchase standard "must comply strictly with federal specifications, being neither more lenient nor more demanding." (*EMA*, 541 U.S. at 257-58.)

While CARB may seek SIP approval of the ACF Regulation, it fails to meet the other requirements of the CFFP. The ACF Regulation's phase-in requirements are inconsistent with those in section 246(b). Moreover, section 246(d) is clear that fleet operators are to be "provide[d] the choice of clean-fuel vehicles and clean alternative fuels" under any compliant plan. The ACF Regulation provides no such optionality. While section 246 offers the choice among any vehicle in a class or category certified to meet model year clean-fuel vehicle standards, (42 U.S.C. § 7581(7)), the ACF Regulation mandates the purchase of only zero

emission vehicles.[8] The CAA requires any compliant purchase standard to allow operators to choose freely among "clean alternative fuels," broadly defined to include:

> *any fuel* (including methanol, ethanol, or other alcohols (including any mixture thereof containing 85 percent or more by volume of such alcohol with gasoline or other fuels), reformulated gasoline, diesel, natural gas, liquefied petroleum gas, and hydrogen) or power source (including electricity) *used in a clean-fuel vehicle that complies with the standards and requirements applicable to such vehicle under this subchapter when using such fuel or power source*

(42 USC § 7581(2) [emphasis added].) But the ACF regulation would prohibit a choice among these fuels, mandating the use of electricity or hydrogen. Because the ACF regulation irreconcilably conflicts with the requirements of CFFP, it is preempted. Additionally, the ACF regulation imposes purchase standards on the acquisition of Class 7 and Class 8 trucks in violation of section 7585.

California cannot circumvent the care with which Congress calibrated the CAA's provisions balancing federal and state authority over fleet vehicle emissions by attempting to adopt its own purchase standard separate and apart from CFFP.[9] Section 246 and its associated provisions demonstrate that Congress intended the federal government to occupy the field of establishing new motor vehicles emissions standards and intended that states regulate new fleet vehicle purchases only in accordance with EPA's oversight and the CAA's design. "Congress's prescription of numerous detailed requirements for such programs [is] inconsistent with unconstrained state authority to enact programs that ignore those requirements." (*EMA*, 541 U.S. at 254 n.6.)

As the Supreme Court explained, "what is the use of imposing such a limitation if the States are entirely free to impose their *own* fleet purchase standards with entirely different specifications?" (*EMA*, 541 U.S. at 258 [emphasis added].)

[8] There is a limited allowance for near zero emission vehicles until 2035, but this cannot save the rule.

[9] The CAA does provide that a state may opt out of the CFFP by providing an alternative program equally capable of achieving the anticipated emissions reductions. (42 U.S.C. § 7511a(c)(4)(B).) In 1999, California did exactly that, substituting its Low Emissions Vehicle program for the CFFP. (64 Fed. Reg. 46849-01 (Aug. 27, 1999).) The Low Emissions Vehicle program did not include a purchase standard, instead creating more stringent emissions standards.

III.

ECONOMIC ASSESSMENT UNDER THE CALIFORNIA APA

A. CARB's Economic Impact Analysis

1. CARB's Obligation to Assess the Economic Impacts of the ACF Regulation

"[T]he APA provides a procedural vehicle to review proposed regulations or modifications thereto in order to 'advance meaningful public participation in the adoption of administrative regulations by state agencies' and create 'an administrative record assuring effective judicial review.'" (*John R. Lawson Rock & Oil, Inc. v. State Air Res. Bd.* (2018) 20 Cal.App.5th 77, 111 [quoting *Western States Petroleum Assn. v. Bd. of Equalization* (2013) 57 Cal.4th 401, 424-425].) Pursuant to their applicable "procedural requirements, agencies must, among other things, (1) give the public notice of the proposed regulatory action; (2) issue a complete text of the proposed regulation with a statement of reasons for it; (3) give interested parties an opportunity to comment on the proposed regulation; (4) respond in writing to public comments; and (5) maintain a file as the record for the rulemaking proceeding." (*John R. Lawson*, *supra*, 20 Cal.App.5th at 111 [quoting *POET, LLC v. Calif. Air Res. Bd.* (2013) 218 Cal.App.4th 681, 743-44]; see also Govt. Code, § 11346.5, subd. (a).)

As part of its disclosures at the outset of the public comment period, CARB "must include '[f]acts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.'" (*Western States*, *supra*, 57 Cal.4th at 425.) When, as here, CARB "makes an initial determination that the action will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall make a declaration to that effect in the notice of proposed action." (Govt. Code, § 11346.5, subd. (a)(8); see also Notice of Public Hearing at 10.) Prior to making this determination, CARB must "assess the potential for adverse economic impact on California business enterprises and individuals, avoiding the imposition of unnecessary or unreasonable regulations or reporting, recordkeeping, or compliance requirements" through the preparation of "a standardized regulatory impact analysis," which "shall address" several factors including the "creation or elimination of jobs within the state," the "creation of new businesses or the elimination of existing businesses within the state," and the "competitive advantages or disadvantages for businesses currently doing business within the state." (*Id.*, subd. (c)(1).)

In addition to an assessment of the potential for a regulation to have a "significant, statewide adverse economic impact directly affecting business," CARB must also describe "all cost impacts . . . that a representative private person or business would necessarily incur in reasonable compliance with the proposed action," (Govt. Code, § 11346.5, subd. (a)(9)), a summary of the conclusions of the standardized regulatory impact analysis, (*id.*, subd. (a)(10)); and a summary of impacts on small businesses. (Cal. Code Regs., tit. 1, § 4.)

If CARB ultimately "decides to enact the regulation" following the public comment period, "it must prepare a 'final statement of reasons' for adopting the proposed rule, which must include '[a]n update of the information contained in the initial statement of reasons.'" (*John R. Lawson*, *supra*, 20 Cal.App.5th at 111 [quoting *Western States*, *supra*, 57 Cal.4th at 426].) "This final statement "must also include '[a] summary of each objection or recommendation made regarding the specific adoption, amendment, or repeal proposed, together with an explanation of how the proposed action has been changed to accommodate each objection or recommendation, or the reasons for making no change.'" (*Id.* [quoting *Western States*, *supra*, 57 Cal.4th at 426].)

While the initial determination need not be "all-inclusive," it must evaluate adverse economic impacts that are "significant," and make an "initial showing" that there was at least "some factual basis for [its] decision." (*Western States*, *supra*, 57 Cal.4th at 428-29.) "Once the initial assessment is complete, 'affected parties may comment on the agency's initial determination and supply additional information relevant to the issue,'" and CARB "must respond to the public comments and either change its proposal in response to the comments or explain why it has not." (*John R. Lawson*, *supra*, 20 Cal.App.5th at 111 [quoting *Western States*, *supra*, 57 Cal.4th at 429].)

2. CARB Failed to Adequately Assess Cost of Ownership to the Regulated Industry

CARB's assessment of cost of ownership is not supported by substantial evidence. Nor does the Public Notice comply with Section 11346.5(a)(9) of the Government Code. Specifically, prior to the release of the Notice of Public Hearing—which appears to be CARB's notice of proposed action under Section 11346.5(a)—WSTA and the Truck & Engine Manufacturers Association ("EMA") submitted evidence to CARB demonstrating CARB's projected cost of the ACF Regulation on regulated parties was far too low. Unfortunately, these issues have not been addressed in CARB's Total Cost of Ownership ("TCO") analysis attached as Appendix G to the ISOR.

Sean Edgar of CleanFleets performed a technical review of the TCO, which is attached as Exhibit "B" to this letter. Mr. Edgar notes several inaccurate assumptions in the TCO. For instance, the TCO ignores data from EMA showing "ZEV purchase costs that are too low," and that ZEVs cost a company much more to purchase than traditional vehicles. (Exhibit "B" at 2.) Conversely, the "ZEV residual values" in the TCO "are too high." (*Id.*) In addition, the TCO does not take into consideration the fact that ZEVs "are not able to perform the same amount of work as traditional trucks," requiring the purchase of additional ZEVs to perform the same tasks as a smaller number of traditional vehicles. (*Id.*)

The TCO also does not take into account the fact that the transition from traditional ZEVs will "require new maintenance facilities and equipment investments" on the part of fleet owners, as well as "the build-out and maintenance of a completely new electricity charging or hydrogen fueling infrastructure." (Ex. "B" at 2.) Nor is there any effort to quantify the "lost productivity" associated with charging ZEVs, the infrastructure costs for sleeper cab tractors, and the

maintenance costs for electric infrastructure. (*Id.*) Each of these issues will substantially increase the costs to fleet owners beyond that stated in the TCO. As a result, the TCO is incomplete and unsupported by substantial evidence.

The TCO also fails to take into consideration data collected by CARB on its central to the cost of ownership. For instance, CARB, working in collaboration with the U.S. Department of energy's National Renewable Energy Laboratory ("NREL"), recently published a report on a demonstration project concerning heavy-duty EVs at Foothill Transit (the "Foothill Report"). The purpose of the Foothill Report was to "compare performance and cost of the BEBs [Battery-Electric Buses] to that of conventional technology in similar service and track progress over time." (Ex. "B" at 3.) The Foothill Report included numerous important findings that undermine the conclusions in the TCO, including the fact that "electricity is 5 to 6.5 times more expensive than CNG fuel," that EVs have much higher per-mile maintenance costs than CNG vehicles, and that EVs have much greater downtime than CNG vehicles. (*Id.*) Despite the fact that CARB participated in the Foothill Report, the TCO contains none of the data or lessons learned in the report.

As explained by Mr. Edgar, the TCO also significantly understates the upfront costs of ZEV trucks. For instance, Mr. Edgar's report contains examples showing the actual price of certain ZEVs is over twice as much as the TCO presumes. The TCO also erroneously assumes that the price of ZEVs will decrease. Mr. Edgar provides data from 2022 showing that the price of ZEVs is actually increasing substantially. (Ex. "B" at 3-5.)

In short, the TCO is flawed as an informational document because it does not include important information regarding costs of ownership, including CARB's own information. Before considering the ACF Regulation, the TCO should be updated significantly to provide further information regarding cost of ownership.

B. CARB's Analysis of Alternatives Under the APA

The Legislature requires state agencies, including CARB, to avoid unnecessary or unduly burdensome regulation. To this end, the Legislature requires agencies to analyze alternatives to the proposed action. "Reasonable alternatives to be considered include, but are not limited to, alternatives that are proposed as less burdensome and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the authorizing statute or other law being implemented or made specific by the proposed regulation." (Govt. Code, § 11346.2, subd. (b)(4)(A).)

CARB may not adopt regulations unless it has determined no alternative to its proposal would be "as effective and less burdensome to affected private persons than the proposed action, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law." (Govt. Code, § 11346.5, subd. (a)(13).) Likewise, in the initial statement of reasons, CARB must affirm and explain, with "supporting information," that "no alternative" it has considered "would be more effective and less

burdensome to affected private persons than the adopted regulation, or would be more cost effective to affected private persons and equally effective" in meeting the proposal's legislative objective. (Govt. Code, § 11346.9, subd. (a)(4) [emphasis added].)

Here, CARB has failed to adequately consider numerous alternatives to the ACF Regulation, including alternatives proposed by EMA (Match Advanced Clean Trucks and Advanced Clean Fleets Zero-Emission Vehicle Deployments Exactly), CTA (Exempt Group 2 and 3 Vehicles and Extend Timeline Six Years to Purchase Group 1 Zero-Emission Vehicles), and WSTA (Credit for Zero-Emission or Natural Gas Vehicles). (ISOR at 255-57, 261-62.)

Each of the above alternatives would achieve CARB's objective of reducing criteria pollutant and GHG emissions. They would also be far "less burdensome to affected private persons than the proposed action," and would also "be more cost effective to affected private persons and equally effective" in meeting the proposal's legislative objective." (Govt. Code, §§ 11346.5, subd. (a)(13), 11346.9, subd. (a)(4).)

As a result of the foregoing, CARB should decline to adopt the ACF Regulation and should instead seriously consider other less burdensome alternatives.

IV.

CARB's ENVIRONMENTAL REVIEW OBLIGATIONS UNDER CEQA

A. Overview of CARB's Obligations Under CEQA

State agencies such as CARB must "refrain from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects." (*City of Arcadia v. State Water Resources Control Bd.* (2006) 135 Cal.App.4th 1392, 1421 [citing *Mountain Lion Found. v. Fish & Game Comm.* (1997) 16 Cal.4th 105, 134].) To perform this evaluation, CARB must "first . . . identify the environmental effects" of a proposed regulation, "and then . . . mitigate [any] adverse effects through the imposition of feasible mitigation measures or through the selection of feasible alternatives." (*Sierra Club v. State Bd. of Forestry* (1994) 7 Cal.4th 1215, 1233.) "The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. This examination is intended to provide the fullest information reasonably available upon which the decision makers and the public they serve can rely in determining whether or not to start the project at all, not merely to decide whether to finish it." (*NRDC v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271.)

State regulatory programs "that meet certain environmental standards and are certified by the Secretary of the California Resources Agency are exempt from CEQA's requirements for preparation of EIRs, negative declarations, and initial studies." (*City of Arcadia*, *supra*, 135 Cal.App.4th at 1421.) The scope of this exemption, however, is narrow, and only excuses ARB

from complying with the requirements found in Chapters 3 and 4 of CEQA (*i.e.*, Pub. Res. Code, §§ 21100-21154) in addition to Public Resources Code § 21167. (Pub. Resources Code, § 21080.5(c).) However, "[w]hen conducting its environmental review and preparing its documentation, a certified regulatory program is subject to the broad policy goals and substantive standards of CEQA." (Kostka & Zischke, Practice Under Cal. Env. Quality Act (2016 update) § 21.10] ["Kostka & Zischke"] [citing *City of Arcadia*, *supra*, 135 Cal.App.4th at 1422; *Sierra Club*, *supra*, 7 Cal.4th 1215; *Californians for Native Salmon & Steelhead Ass'n v. Dept. of Forestry* (1990) 221 Cal.App.3d 1419; *Envt'l Protection Info. Ctr. v. Johnson* (1985) 170 Cal.App.3d 604, 616].) The broad policy goals of CEQA include: (1) providing public agencies and the public with detailed information about the effect that a proposed project is likely to have on the environment, (2) identifying the ways in which the significant effects of a proposed project might be minimized, and (3) identifying alternatives to the proposed project. (See Pub. Resources Code, §§ 21002, 21002.1(a), 21061; CEQA Guidelines, § 15362.) Thus, the CEQA Guidelines expressly provide that "[i]n a certified program, an environmental document used as a substitute for an EIR must include '[a]lternatives to the activity and mitigation measures to avoid or reduce any significant or potentially significant effects that the project might have on the environment.'" (*City of Arcadia*, *supra*, 135 Cal.App.4th at 1422 [quoting CEQA Guidelines, § 15252(a)(2)(A)].)

CARB must respond to the issues raised by the public by providing a "good faith, reasoned analysis in response, and at a level of detail that matches the level of detail in the comment." (CEQA Guidelines, § 15088(c); *Pfeiffer v. City of Sunnyvale* (2011) 200 Cal.App.4th 1552, 1568.) If CARB disagrees with the "recommendations and objections raised in the comments," the "recommendations and objections" "must be addressed in detail," with the agency "giving reasons why specific comments and suggestions were not accepted." (CEQA Guidelines, § 15088(d).) "Conclusory statements unsupported by factual information will not suffice." (*Id.*)

B. The EA Does Not Adequately Assess the Environmental Impacts Associated with the New Facilities and Infrastructure

1. By Assessing the Alleged Benefits of the ACF Regulation in a Quantitative Manner and the Potential Impacts in a Qualitative Manner, CARB Has Failed to Provide Data Allowing the Public and CARB's Decisionmakers to Adequately Assess the Potential Impacts of the ACF Regulation

In support of the ACF Regulation, CARB staff performed a detailed quantitative analysis of alleged emissions benefits associated with the adoption of the ACF Regulation. This assessment includes supposed air quality benefits from mobile source emissions in both the South Coast and San Joaquin Valley air basins, as well as statewide. (See Appendix F, Tables 8-10.) These figures are stated in precise units of tons per day or tons per year, depending on the pollutant at issue. (*Id.*)

The EA, however, recognizes the ACF Regulation would result in the installation of an extensive amount of infrastructure needed to accommodate ZEVs, the construction of a large number of new and modified facilities built to increase the supply of ZEVs, an increase in the number of facilities required to produce electricity and hydrogen fuel, and the increased extraction of raw materials "such as lithium, platinum, or other elements." (EA at 19-21.) With respect to air quality and several other resources, the EA finds the impacts of these new facilities to be potentially significant and unavoidable. (See, e.g., *id.* at 40.) With respect to climate change and GHG emissions, the EA finds the impacts to be less than significant. (*Id.* at 64.)

Although the EA specifies "suggested" mitigation to offset these significant environmental effects, the EA does not identify any mitigation measures that would provide enforceable mechanisms to lessen the significant impacts of the proposed regulation. Instead, for each of the resources, the EA finds the impact would continue to be significant and unavoidable because CARB does not possess land use authority over new those new facilities. (See, e.g., *id.* at 39-40.) Nowhere, however, does CARB attempt to quantify the potential impacts associated with the installation of these new facilities.

In other words, the ISOR touts the alleged mobile source benefits of the ACF Regulation in a high level of detail, providing the public and CARB's decisionmakers the misleading picture that adoption of the ACF Regulation would result in those air quality benefits. This is simply not true, as the ACF Regulation would result in the installation of facilities that would themselves generate criteria pollutant and greenhouse gas emissions. CARB, however, has not even attempted to estimate those emissions, leaving the public and CARB decisionmakers with only half of the analysis. (*Cf. Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311 ["CEQA places the burden of environmental investigation on government rather than the public," and a lead agency "should not be allowed to hide behind its own failure to gather data."].)

CARB staff may argue it is speculative to assess the potential emissions associated with the installation of new facilities. Any such argument would be entirely inaccurate. For example, as explained by Ramboll, it is entirely feasible for CARB "to make a high-level determination of the number of EV chargers and substation installations that would be necessary to fuel" the new vehicle populations created by the ACF Regulation, "and then estimate the emissions impacts of the construction of this infrastructure." (Exhibit "A" at 2.) After this assessment is completed, it is entirely possible that the alleged emissions benefits of the ACF Regulation will be lowered substantially, if not eliminated.

By declining to perform an apples-to-apples assessment of these potential emissions, CARB staff has shielded from the public and CARB decision makers from evaluating the true consequences of the ACF Regulation. As a result, the ISOR and the EA should be overhauled substantially to include a quantitative assessment of ***both*** the benefits and negative effects of the ACF Regulation.

2. CARB's Findings that the ACF Regulation's Impacts to Resources Is Significant and Unavoidable, Without Actually Performing an Quantitative Assessment of those Impacts, Violated CEQA

An environmental document cannot simply label an impact "significant and unavoidable" without first providing adequate discussion and analysis, as this would "allow[] the agency to travel the legally impermissible easy road to CEQA compliance." (*Berkeley Keep Jets Over the Bay Comm. v. Bd. of Port Comm'rs* (2001) 91 Cal.App.4th 1344, 1370.) Accordingly, the eventual adoption of a statement of overriding considerations does not excuse the lead agency from properly conducting environmental review in the first instance. (*Id.*) Rather, the lead agency must adequately quantify the impact, and consider feasible mitigation based on that analysis, prior to concluding that an impact is "significant and unavoidable." (See, e.g., *Sundstrom*, *supra*, 202 Cal.App.3d at 311.) As such, "sole reliance" on another agency's regulatory authority "is inadequate to address environmental concerns under CEQA." (*Californians for Alternatives to Toxics v. Department of Food and Agriculture* (2005) 136 Cal.App.4th 1, 16.)

The EA claims there is "some inherent uncertainty in the degree of mitigation that would ultimately need to be implemented" because "decisions by the regulated entities regarding compliance options are unknown. (EA at 10-11.) Consequently, CARB states the EA's significance conclusions supposedly "tend[] to overstate the risk that feasible mitigation may not be implemented by the agency with authority to do so, or may not be sufficient to mitigate an impact to less than significant." (*Id.* at 11.) Nevertheless, the EA claims, "[i]t is also possible that the amount of mitigation necessary to reduce environmental impacts to below a significant level may be far less than disclosed in th[e] Draft EA" because "[i]t is expected that potentially significant impacts of many individual development projects would be avoidable or mitigable to a less than significant." (*Id.*) There are several problems with this approach.

First, "identification of the precise details of project-specific mitigation" is not necessary to determine "the degree of mitigation that would ultimately need to be implemented" in all cases, as the EA claims. (*Id.* at 26.) As explained by Ramboll, it is entirely feasible to generally estimate the potential consequences of the increased need for EV chargers and substation installations, as well as the potential effects of such new infrastructure. (See generally Exhibit "A" at 2.)

Second, by expressly claiming to overstate the risk that feasible mitigation may be insufficient while, at the same time, asserting that impacts could be reduced to less-than-significant levels by local lead agencies, the EA obscures the significance of its identified impacts. However, an environmental document that does not include sufficient information to "enable[] the reader to evaluate the significance of [] impacts" is inadequate under CEQA. (*Lotus v. Dept. of Trans.* (2014) 223 Cal.App.4th 645, 654.) CARB's approach "precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences." (*Id.* at 658.)

The fact that the proposed project's significant environmental impacts could potentially be mitigated by local lead agencies does not relieve CARB from its duty to consider and to quantify the project's environmental impacts.

Third, by relying solely on local lead agencies to enforce mitigation measures, the EA sidesteps analysis of important environmental impacts. Here, as in *Californians for Alternatives to Toxics*, CARB has "repeatedly deferred" to local and federal "regulatory scheme[s] instead of analyzing environmental consequences." (*Californians for Alternatives to Toxics*, *supra*, 136 Cal.App.4th at 16.) As such, CARB has failed to discharge its duty under CEQA to "meaningfully consider the issues raised by the proposed project." (*Id.*) In *Californians for Alternatives to Toxics*, the lead agency relied on another agency's regulatory scheme to support a finding of no significant impact. (*Id.* at 17.) Here, in contrast, CARB finds a significant impact, but then immediately asserts that the impact may not actually be significant in light of state and federal regulatory schemes. In both cases, however, the result is the same: the lead agency sidesteps CEQA's informational purpose and fails to "meaningfully consider the issues raised by the proposed project." (*Id.* at 16.)

3. The EA Does Not Propose Adequate Mitigation for New/Modified Facilities

CEQA requires mitigation measures to be enforceable through means that are legally binding. (Pub. Resources Code, § 21081.6, subd. (b); CEQA Guidelines, § 15126.4.) This requirement is designed to ensure that mitigation measures will actually be implemented. (*Fed. of Hillside & Cyn. Ass'ns v. City of Los Angeles* (2004) 83 Cal.App.4th 1252, 1261; *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1186.)

None of the mitigation measures identified in the EA are enforceable through legally binding means. Instead, the EA merely identifies "[r]ecognized practices routinely required to avoid and/or minimize impacts to" the relevant resource category. (See, e.g., EA at 28, 32, 34, 39, 103.) There is nothing in the proposed ACF Regulation, however, that ensures those "recognized practices" will actually be implemented. Although CARB defends this approach on the ground that it "does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions," (see EA at 28, 32, 34, 39, 50, 53, 61, 68, 74, 90, 93, 98, 101, 103, 106), that is insufficient to discharge CARB's obligations under CEQA. The EA contains no discussion or analysis regarding CARB's consideration of feasible mitigation measures, other than to state in conclusory fashion that none exist. CARB must use whatever authority it has at its disposal to ensure that the mitigation measures identified in the EA are enforceable through legally-binding means. Thus, at the very least, CARB must analyze a range of potential mitigation measures and determine, based on the results of that analysis, whether such measures are feasible or not.

That being said, CARB is empowered by CEQA to adopt mitigation measures that another agency should implement, where their enforcement is not within CARB's jurisdiction. (*Tiburon Open Space Committee v. County of Marin* (2022) 78 Cal.App.5th 700, 745 ["CEQA is

not blind to the possibility of multiple jurisdictions or agencies having some degree of involvement or responsibility for a project. Mitigation may be within the jurisdiction of another entity, and a project may be approved with a finding that a mitigation measure 'should be[ ] adopted' by another entity that has exclusive jurisdiction."] [quoting Pub. Resources Code, § 21081, subd. (a)(2).)]; see also *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 366 ["CEQA . . . . does not require a public agency to undertake identified mitigation measures, even if those measures are necessary to address the project's significant environmental effects, if the agency finds that the measures" are not within its jurisdiction to enforce.]; and see CEQA Guidelines § 15091 [specifically noting that a valid finding regarding significant impacts includes that changes to a project to reduce impacts are within jurisdiction of another agency and should be adopted by that agency].) CARB's failure to do so here violates CEQA.

C. Other Air Quality/GHG Impacts Are Not Adequately Assessed in the EA

1. The EA Fails to Evaluate Lifecycle Emissions for the GHG Reductions Contemplated Under the ACF Regulation

For numerous other rulemakings, including the Low Carbon Fuel Standard, CARB has used the CA-GREET3.0 Model to assess lifecycle GHG emissions associated with various fuels. In the ISOR, however, CARB declines to perform a similar lifecycle analysis for the ZEVs that will displace combustion engines. Had CARB used the CA-GREET3.0 model and attempted to perform a lifecycle analysis, the alleged emissions benefits would likely be reduced. Indeed, as explained by Ramboll, the American Transportation Research Institute (ATRI) has demonstrated the lifecycle emissions of BEVs is far higher than internal combustion engine vehicles and fuel cell electric vehicles. (Exhibit "A" at 4.) By declining to perform this analysis, CARB continues to obscure the impacts of the ACF Regulation on GHG emissions.

2. The EA Fails to Analyze Emissions Associated with the Operation of EVs

The EA's discussion of air quality impacts is also incomplete because it does not assess criteria pollutant emissions particular to EVs. For example, the EA does not analyze or include an assessment of the impacts on "ZEV weight on PM emissions from tire wear and entrained road dust." (Exhibit "A" at 3.) As explained by Ramboll, it is "reasonably foreseeable that ZEVs will be heavier than the internal combustion engine vehicles (ICEVs) currently on the road." (*Id.*) Because the weight increase is likely to outpace "the 2,000 lbs allowance under [AB] 2061 for alternative fueled vehicles, either more vehicles will be required to transport goods or the weight threshold for the vehicles will need to be further increased." (*Id.*) Under either circumstance, the ACF Regulation will result in PM10 emissions that are not addressed in the EA. As explained by Ramboll:

> If the former occurs, the increase in vehicle miles traveled (VMT) will result in an increase in PM emissions from tire wear and entrained road dust. If the latter occurs, the increased average vehicle weight will similarly result in an increase in PM emissions. . . . Given that non-exhaust emissions account for over 90% of PM10 and 85% of PM2.5 emissions from traffic, *the effects of increased vehicle weight may be significant*.

(*Id.* [emphasis added].)

D. CARB's Energy Assessment Fails to Meet CEQA's Requirements

CEQA requires that lead agencies evaluate the potential impacts of projects to energy consumption. Specifically, agencies are requires to assess whether a project "may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources," and if so recommend mitigation. (CEQA Guidelines, § 15126.2(b).) "This analysis should include the project's energy use for all project phases and components, including transportation-related energy . . . ." (*Id.*; see also CEQA Guidelines, Appendix F.)

1. The EA Does Not Discuss Baseline Conditions With Respect to Energy Consumption

As an initial matter, the EA is legally deficient under CEQA because it makes no effort to discuss baseline conditions—i.e., current energy consumption. This is highly problematic in the context of energy consumption, as there is nothing against which to compare the impacts of the ACF Regulation to determine whether impacts to energy consumption are potentially significant. (See CEQA Guidelines, § 15125.) By declining to include baseline conditions with respect to energy consumption, there is no way to evaluate whether the ACF Regulation will result in the "wasteful, inefficient, or unnecessary consumption of energy," and as such the EA violates CEQA.

2. The EA Does Not Adequately Analyze Whether the Project Will Result in the Wasteful, Inefficient, or Unnecessary Consumption of Energy

The EA recognizes that the "electrification of the various sectors affected by the [ACF Regulation] could increase local and regional energy use and impact supplies and requirements for additional capacity," and that the ACF Regulation may also "impact peak and base load period demands for electricity and other forms of energy. (EA at 57.) The EA, however, ultimately finds that these potential impacts could potentially be avoided in two ways:

> (1) Through "asset management, system design practices, and managed charging to shift a significant amount of the load away

> from system peaks. Charging management strategies beyond time-of-use rates, including those that reflect wholesale prices and carbon intensity, will be needed to align electric vehicle loads with daytime solar generation. And charging technologies should be coordinated with distribution systems to lessen the impact of charging timed to begin at off peak periods when appropriate." (EA at 57.)
>
> (2) Through other preexisting long-term planning initiatives, including SB 32, triennial updates to Title 24 Building Standards Code, federal Infrastructure Investment and Jobs Act, updates to California Energy Code, SB 100, SB 1505. (See EA at 58-59.)

Ultimately, the EA finds impacts to energy would be less than significant and beneficial. (EA at 56, 60.)

This method of analysis violates CEQA. First, the practices referenced above are not part of the "project" under CEQA. The ACF Regulation, of course, does not contemplate or otherwise compel "asset management, system design practices, and managed charging." Nor are any of the preexisting long-term planning initiatives themselves part of the "project." Rather, these measures are best described as "mitigation" that would allegedly avoid the ACF Regulation's potentially significant impacts. (Cf. CEQA Guidelines, § 15370 [defining mitigation as a measure that would avoid or minimize the potential impacts of a project].)

These avoidance measures fail as mitigation. They are not binding or otherwise enforceable against any person. (CEQA Guidelines, § 15126.4(a)(2).) For instance, if utilities and others were not engaged in optimal "asset management, system design practices, and managed charging" sufficient to reduce energy consumption, CARB would have no enforceable mechanism to change that behavior. More fundamentally, the EA provides no explanation of exactly how these measures would supposedly avoid the potential energy effects of the ACF Regulation, much less any attempt to quantify the potential impacts of the regulation.

There is likewise no discussion in the EA about grid reliability and the potential for the ACF Regulation to impact the ability of the state's electricity grid to deliver electricity reliably with projected load demand. This is particularly important given that summer-time threats of rolling blackouts have become the norm in California. Moreover, because much of the state's grid is powered by solar energy, which decreases toward the end of the day, much of the stress on the grid is felt most acutely in the late afternoon/early evening, prompting calls for consumers to conserve energy when they return home from work. This coincides with the end of work shifts and the return of trucks to the yard for charging. Despite this, the EA contains no discussion regarding grid reliability and California's ability to meet new energy demands associated with the ACF Regulation.

E. Traffic Impacts

As previously explained in WSTA's April 8, 2021, correspondence, "[c]urrent ZEVs are not a 'one to one' replacement and vehicles operating at their maximum legal weight face a significant weight penalty despite the 2,000 lbs weight allowance of AB 2061." In other words, fleet sizes will need to expand to accommodate the existing demand. This will require fleets to purchase additional trucks, which, in return, will result in additional vehicle miles traveled ("VMT") by those trucks. (Exhibit "A" at 3.) Despite this, there is no mention of this potential impact in the EA.

F. CARB's Analysis of Alternatives Violates CEQA

1. CARB's Obligation to Assess Project Alternatives

The requirement that environmental documents identify and discuss alternatives to the project stems from the fundamental statutory policy that public agencies should require the implementation of feasible alternatives or mitigation measures to reduce the project's significant impacts. (See, e.g., Pub. Resources Code, § 21002.) The lead agency must "focus on alternatives to the project . . . which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives. . . ." (CEQA Guidelines, § 15126.6(b).) Additionally, the range of alternatives "shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." (*Id.* at subd. (c).) The CEQA Guidelines specifically recognize that comments raised by members of the public on an environmental document are particularly helpful if they suggest "additional specific alternatives . . . that would provide better ways to avoid or mitigate the significant environmental effects." (CEQA Guidelines, § 15204.)

2. The EA Defines the Project Objectives Too Narrowly

"A lead agency may not give a project's purpose an artificially narrow definition." (*In re Bay-Delta* (2008) 43 Cal.4th 1143, 1162.) It is improper for a lead agency to "artificially narrow" the description of the project objectives to such an extent that the alternatives analysis "would be a foregone conclusion." (*We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.4th 683, 692.) Such an approach would turn the alternatives section of the environmental document "into an empty formality," (*id.* [citing *Bay-Delta*, *supra*, 43 Cal.4th at 1162]), which constitutes prejudicial error because it prevents informed decision making and public participation. (*Id.* [citing Pub Resources Code, § 21005, subd. (a); *North Coast Rivers Alliance* (2015) 243 Cal.App.4th 647, 668].)

While some of the project objectives here focus on the ultimate end of reducing criteria pollutant and greenhouse gas emissions, the majority of the project objectives articulated in the ISOR and the EA focus myopically on ZEVs as the specific means to achieve that end. For instance, Project Objective No. 1 seeks to facilitate "the attainment of NAAQS for criteria air pollutants" by "[a]ccelerat[ing] the deployment of ZEVs . . . ." (EA at 146.) Project Objective No. 3 seeks to "[d]ecrease GHG emissions . . . by adopting strategies to deploy medium- and

heavy-duty ZEV in California . . . ." (*Id.* [emphasis added].) Project Objective No. 6 seeks "the transition of California's medium- and heavy-duty transportation sector from internal combustion to all electric powertrains," and "to support ZEV sales . . . ." (*Id.*) Project Objective No. 10 seeks to promote acceleration of the development of "environmentally superior medium- and heavy-duty vehicles" by fostering "market certainty for zero-emission technologies . . . ." (*Id.* at 147.) Project Objective Nos. 8 and 12 focus solely on the means, seeking to, respectively, "[i]ncentivize and support "emerging zero-emission technology," and "[s]pur economic activity of zero-emission technologies in the medium- and heavy-duty vehicle sectors." (*Id.*) By focusing on CARB's preferred means—electric vehicles and other ZEVs—as opposed to the actual objectives of the regulation, the EA essentially prohibits CARB from considering other alternatives that also achieve emissions reductions and avoid the serious environmental consequences of the ACF Regulation. This is demonstrated in CARB's assessment of the alternatives proffered by CTA, WSTA, and EMA, all of which were rejected primarily on the grounds that they would result in the deployment of fewer ZEVs and thus would be less effective in achieving the above objectives than the ACF Regulation. (See EA at 155, 157, 158.)

3. Because the Alternatives Proposed by EMA, CTA, and WSTA Would Avoid the Significant and Unavoidable Impacts of the ACF Regulation, CARB's Rejection of those Alternatives Violates CEQA

The EA also impermissibly rejects the alternatives proposed by EMA, CTA, and WSTA. Each of these alternatives would rely more heavily than the ACF regulation on existing technologies and infrastructure. As a result, the three alternatives would not induce or require the construction of new facilities or the development of new infrastructure to the same extent as the ACF Regulation. Because virtually all of the impacts in the EA that were found to be significant and unavoidable were created by the need for new facilities or the development of new infrastructure, the three alternatives would either significantly reduce or avoid all of the significant and unavoidable impact identified in the EA. Because CARB must "focus on alternatives to the project . . . which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives," (CEQA Guidelines, § 15126.6(b)), CARB may not simply reject the proposed alternatives.

G. CARB's Certified Regulatory Program Violates CEQA Because it Contemplates Post Hoc Environmental Review and Delegation of CEQA Authority to the Executive Officer

The EA states that, following its public meeting on October 27, 2022, to approve the ADF Regulation, the CARB Board may direct the Executive Office to make further changes to the ACF Regulation and finalize the environmental review process without bringing those changes back to the CARB Board. (EA at 12-13.) If CARB proceeds in this fashion, it would violate CEQA's prohibitions on post hoc environmental review and delegation of environmental review authority to a person who did not initially approve the project.

1. CARB's Certified Regulatory Program Authorizes Post Hoc Environmental Review, in Violation of CEQA

As the Supreme Court explained in *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376 "[a] fundamental purpose of an EIR is to provide decision makers with information they can use in deciding whether to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved. If post-approval environmental review were allowed, EIR's would likely become nothing more than post hoc rationalizations to support action already taken." (*Id.* at 394; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 79; CEQA Guidelines, § 15004, subd. (a) ["Before granting any approval of a project subject to CEQA, every lead agency . . . shall consider a final EIR . . . ."] [emphasis added].) Moreover, the timing requirement set forth in § 15004 of the CEQA Guidelines "applies to the environmental review documents prepared by [C]ARB . . . in lieu of an EIR." (*POET*, *supra*, 218 Cal.App.4th at 716.)

By authorizing the Executive Officer to perform "further environmental review" associated with changes to the regulatory language pursuant to Government Code § 11346.8(c) "after [the state board] approves of the project," the EO would engage in post hoc environmental review in violation of CEQA. As explained above, both the initial regulatory proposal and any subsequent 15-day modifications are part of the same "project" under CEQA. The two actions would be "integral parts" of each other and the 15-day modifications are a "reasonably foreseeable consequence" of the original proposed regulations. (*Sierra Club*, *supra*, 128 Cal.App.4th at 698.) Therefore, authorizing the Executive Officer to perform "further environmental review" after the state board approves the project at issue would constitute impressible post hoc environmental review.

2. CARB's Certified Regulatory Program Violates CEQA Because it Authorizes the Delegation of CEQA Decision-making Authority to a Person Who Did Not Initially Approve the Regulation

Delegation to the Executive Officer is improper if the Executive Officer lacks the authority to approve or disapprove the project. This observation is consistent with the decision in POET in which the court held that:

> [T]he principle that prohibits the delegation of authority to a person or entity that is not a decision-making body includes a corollary proposition that CEQA is violated when the authority to approve or disapprove the project is separated from the responsibility to complete the environmental review. [Citations.] This conclusion is based on a fundamental policy of CEQA. For an environmental review document to serve CEQA's basic purpose of informing governmental decision makers about environmental issues, that document must be reviewed and considered by the same person or group of persons who make the decision to approve or

> disapprove the project at issue. In other words, the separation of the approval function from the review and consideration of the environmental assessment is inconsistent with the purpose served by an environmental assessment as it insulates the person or group approving the project "from public awareness and the possible reaction to the individual members' environmental and economic values."

(*POET*, *supra*, 218 Cal.App.4th at 731 [quoting *Kleist v. City of Glendale* (1976) 56 Cal.App.3d 770, 779] [emphasis added].)

The term "'[p]roject' means 'the whole of the action'" that otherwise qualifies as a "project" under CEQA. (*Concerned McCloud Citizens v. McCloud Community Servs. Dist.* (2007) 147 Cal.App.4th 181, 192 [quoting CEQA Guidelines, § 15378(a)]; see also Pub. Resources Code, § 21002.1(d) ["The lead agency shall be responsible for considering the effects . . . of all activities involved in a project."] [emphasis added].) It "'does not mean each separate governmental approval.'" (*Id.* [quoting CEQA Guidelines, § 15378(c)].) Rather, the term "project" "is broadly construed and applied in order to maximize protection of the environment." (*Nelson v. County of Kern* (2010) 190 Cal.App.4th 252, 271 [emphasis added].) Consequently, "[c]ourts have considered separate activities as one CEQA project and required them to be reviewed together where, for example, the second activity is a reasonably foreseeable consequence of the first activity … or both activities are integral parts of the same project." (*Sierra Club*, *supra*, 128 Cal.App.4th at 698.) Moreover, CEQA requires the lead agency to perform its environmental review "at the earliest possible stage." (*Calif. Oak Found. v. Regents of the Univ. of Calif.* (2010) 188 Cal.App.4th 227, 271.)

CARB's certified regulatory program purports to delegate to the Executive Officer authority to approve or disapprove the 15-day modifications to the proposed project, but they do not—and cannot—delegate to the Executive Officer authority to approve or disapprove the project, since that decision will have already been made by CARB. Consequently, "the authority to approve or disapprove the project [would be] separated from the responsibility to complete the environmental review." (*POET*, *supra*, 218 Cal.App.4th at 731 [emphasis added].) As the court in *POET* explained, "[f]or an environmental review document to serve CEQA's basic purpose of informing governmental decision makers about environmental issues, that document must be reviewed and considered by the same person or group of persons who make the decision to approve or disapprove the project at issue." (*Id.* [emphasis added].) CARB's potential course of action does just the opposite. It suggests CARB's governing board may approve the ACF Regulation, but then delegate authority to a different person, the Executive Officer, to approve the 15-day modifications and any associated environmental review. This improperly "insulates the person or group approving the project"—i.e., CARB—"'from public awareness and the possible reaction" regarding the 15-day modifications and their environmental impacts, since those issues are reviewed and approved by the Executive Officer. (*Id.* [quoting *Kleist*, *supra*, 56 Cal.App.3d at 779].)

As such, in the event CARB makes any changes to the proposed ACF Regulation after the October 27, 2022, hearing, the Executive Officer may not act on those modifications, and must instead bring the changes back to CARB's governing board.

V.

CARB FAILED TO ENGAGE IN EXTERNAL PEER REVIEW OF THE ACF REGULATION

Pursuant to Section 50074 of the Health and Safety Code, CARB may not "take any action to adopt the final version of a rule unless" it undertakes a peer review to evaluate the "scientific portions" of the rule. (Health & Saf. Code, § 57004(d).) Section 57004 was enacted by the Legislature in response to "[s]ignificant questions . . . raised by both the environmental and regulated communities about the scientific basis for some rules." (California Bill Analysis, S.B. 1320 Assem., 8/11/1997.) Thus, it requires CALEPA agencies, such as the CARB, to submit the "scientific portions" of a proposed regulation to an external peer reviewer "for the purpose of conducting an analysis of the science on which the regulation is based." (*Id.*) The peer reviewer must then "provide a written evaluation as to whether the scientific portion of the rule is based on sound scientific knowledge, methods and practices." (*Id.*; see also Health & Saf. Code, § 57004(d) [stating that "board, department, or office [must] submit[] the scientific portions of the proposed rule, along with a statement of the scientific findings, conclusions, and assumptions on which the scientific portions of the proposed rule are based and the supporting scientific data, studies, and other appropriate materials, to the external scientific peer review entity for its evaluation" and that the "external scientific peer review entity [must] prepare[] a written report that contains an evaluation of the scientific basis of the proposed rule"].) The "scientific portions" of a proposed regulation include "those foundations of a rule that are premised upon, or derived from, empirical data or other scientific findings, conclusions, or assumptions establishing a regulatory level, standard, or other requirement for the protection of public health or the environment." (*Id.*, subd. (a)(2).)

The proposed regulation contains numerous "scientific portions" that must be subjected to external peer review pursuant to § 50074 because they "are premised upon, or derived from, empirical data or other scientific findings, conclusions, or assumptions establishing a regulatory level, standard, or other requirement for the protection of public health or the environment." (*Id.*, subd. (a)(2).) These "scientific portions" include, but are not limited to:

- The total cost of ownership of ZEVs, including the analysis in Appendix G to the ISOR.
- The alleged emissions benefits of the ACF Regulation as discussed in Appendix F of the ISOR, as well as the potential negative criteria pollutant and GHG emissions impacts associated with the new construction and infrastructure required to accommodate demand for new ZEVs.

- The assessment of the ACF Regulation's impact on the California energy grid and grid reliability.

As such, CARB must submit these portions of the rule, "along with a statement of the scientific findings, conclusions, and assumptions on which [they] are based and the supporting scientific data, studies, and other appropriate materials, to the external scientific peer review entity for its evaluation." (*Id.* at subd. (d)(2).) Because there is no evidence of CARB obtaining peer review for any of the above scientific portions of the ACF Regulation, CARB may not approve the ACF Regulation on October 27, 2022.

VI.

THE ACF REGULATION IS INCONSISTENT WITH THE USEFUL LIFE PROVISIONS OF SECTION 43021 OF THE HEALTH & SAFETY CODE

Section 2015.1 of the ACF Regulation contemplates that, after January 1, 2024, fleet owners may only add ZEVs to their fleets, and that no internal combustion engine vehicles ("ICEVs") may be added to a fleet after that date unless a waiver is obtained. These provisions, however, are contrary to the plain requirements of Section 43021 of the Health & Safety Code.

Section 43021 was enacted "to provide owners of self-proposed commercial motor vehicles . . . certainty about the useful like of engines certified by" CARB and other agencies "to meet required environmental standards for sale in the state." (Health & Saf. Code, § 43021, subd. (d).). As the Senate Bill Analysis for S.B. 1 explains, Section 43021 "[s]ets a 'useful life' period where truckers subject to future, undefined regulations can get a return on their investment before being asked to replace or modify the vehicle. Thus, if the California Air Resources Board (ARB) adopts future in-use regulations, trucks will not be required to turnover until they have reached 13 years from the model year the engine and emission control systems are first certified or until they reach 800,000 vehicle miles traveled. (California Bill Analysis, S.B. 1 Sen., 4/3/2017.) Accordingly, Section 43021 provides that, with limited exceptions inapplicable here, "the retirement, replacement, retrofit, or repower of a self-propelled commercial motor vehicle . . . *shall not be required* until the later of . . . [t]hirteen years from the model year the engine and emission control system are first certified" or when "the vehicle reaches the earlier of either 800,000 vehicle miles traveled or 18 years" from the certification of the engine and emission control system. (*Id.*, subd. (a) [emphasis added].)

Notably, Section 43021 contains no carve outs or exceptions that allow CARB to limit its protections for vehicles added to a fleet after January 1, 2024. Nor is there any language in the regulation that allows CARB to limit the use of ICEVs that are lawful under Section 43021 to certain compliance options. Moreover, after January 1, 2024, both California and U.S. EPA will continue to certify ICEVs for use in California. Those engines would plainly fall within Section 43021, which means CARB cannot require the "retirement, replacement, retrofit, or repower" of those engines.

As a result of the foregoing, Section 2015.1 should be substantially revised to conform to the requirements of Section 43021 of the Health & Safety Code.

VII.

CONCLUSION

CARB should not adopt the ACF Regulations. CARB should instead continue to work with affected stakeholders to ensure the ACF Regulations will not adversely affect private individuals and small businesses or cause significant adverse environmental effects.

Thank you for your consideration of these comments.

Respectfully submitted,

John P. Kinsey

Enclosures

EXHIBIT “A”

MEMORANDUM

To: John Kinsey, Wanger Jones Helsley PC
Lee Brown, Western States Trucking Association
Chris Shimoda, California Trucking Association

From: Varalakshmi Jayaram and Julia Lester
Ramboll US Consulting, Inc.

Subject: **COMMENTS ON THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ANALYSIS IN THE DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED ADVANCED CLEAN FLEETS REGULATION**

CEQA TECHNICAL COMMENTS

The CEQA analysis presented in the for the Draft Environmental Assessment (EA) for the Advanced Clean Fleets (ACF) regulation has numerous inadequacies and/or omissions which need to be corrected before the adoption of the proposed ACF regulation. When conducting a CEQA analysis, the California Air Resources Board (CARB) is required to consider the full environmental impact of a proposed regulation or project, yet fails to quantify the emissions impacts of electric fueling infrastructure construction, increased particulate matter (PM) emissions due to increased vehicle weight, and the life cycle greenhouse gas (GHG) emissions of medium/heavy duty vehicles (M/HDVs) affected by this proposal.

The environmental impacts of electric vehicle (EV) charger and infrastructure construction, PM emissions from brake and tire wear, and GHG emissions from zero emission vehicle (ZEV) production are possible to quantify and it is highly likely that they would be more than significant. CARB must complete these analyses and publish a revised draft EA that includes these revised analyses. Without this the CARB Board, stakeholders, and the public will not be able to understand the full impacts of the proposed ACF regulation and/or identify environmentally superior alternatives or revisions.

The following sections provide additional details on these inadequacies and/or omissions in CARB's CEQA analysis:

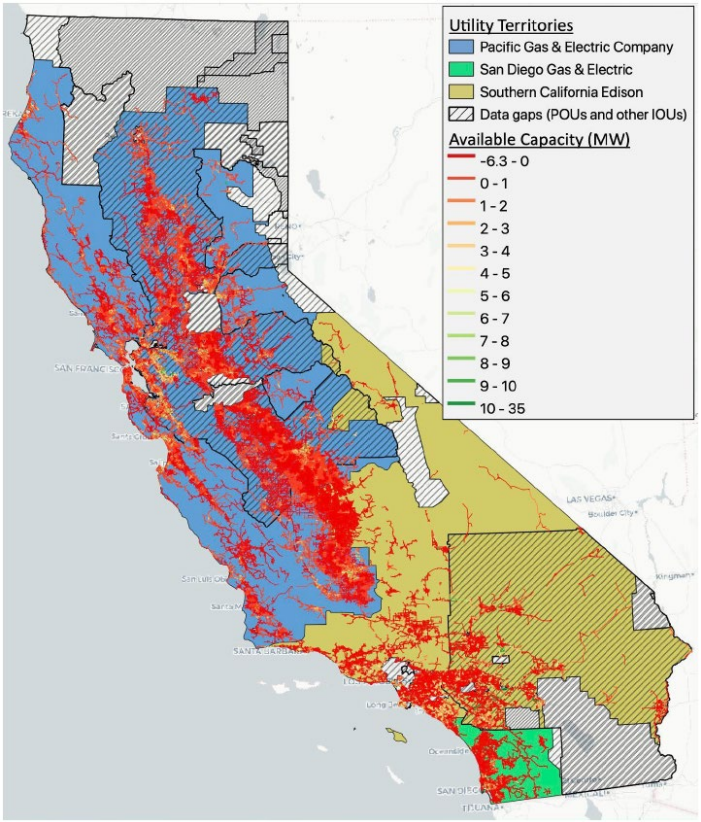
Inadequate Assessment of EV Fueling Infrastructure

One of the most direct impacts from CARB's proposed ACF regulation is the installation of EV charging infrastructure for hundreds of thousands of zero emission (ZE) M/HDVs that will be deployed across the state. It is critical that the impacts for infrastructure construction are properly considered in CARB's CEQA analysis. Given CARB's extensive research into the vehicle populations that will

be affected by the regulation,[1] CARB could conduct an analysis to make a high-level determination of the number of EV chargers and substation installations that would be necessary to fuel these vehicles and then estimate the emissions impacts of the construction of this infrastructure.

CARB does provide CEC projections for charger needs in the Draft EA,[2] stating that 157,000 chargers will be necessary by 2030 and 258,000 chargers by 2037 to support M/HDV electrification but does not project the number of new substations that would be required. As shown in the EA for the Advanced Clean Cars II regulation (ACC II) regulation, there is no excess grid capacity to support M/HDV charging throughout a majority of the state of California (**Figure 1**),[3] meaning infrastructure upgrades would be required for a significant majority of new EV charging stations. With assistance from utilities, CARB could determine how many new substations would be required to meet the increased electrical demand from these chargers and estimate the level of construction that will be required across the state.

Figure 1: Capacity Analysis from the California Energy Commission's EDGE Model[4]



[1] CARB. 2022. Appendix D Draft Environmental Analysis for the Proposed Advanced Clean Fleet Regulation. August 30. Available here: https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/appd.pdf. Accessed: October 2022.

[2] Ibid.

[3] CARB. 2022. Appendix E Final Environmental Analysis for the Proposed Advanced Clean Cars II Program. August 24. Available here: https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/accii/acciifinalea.docx. Accessed: October 2022.

[4] Ibid.

CARB could use this data to quantify and evaluate the emissions impacts for charger and substation construction using their statewide land use emissions computer model CalEEMod®. This model includes default assumptions for construction and operation of a variety of projects and can be used to estimate criteria air pollutant and greenhouse gas emissions associated with the construction of EV charging stations and substations.

As the lead agency, it is CARB's responsibility to perform such an analysis in order to determine the reasonably foreseeable impact of the proposed ACF regulation for EV infrastructure development projects that will result from the regulation as a part of their CEQA analysis. Without the analyses discussed above, their impact analysis is incomplete and misleading.

Incomplete Assessment of PM Emissions

Under CEQA, CARB is required to assess all reasonably foreseeable emissions impacts associated with the regulation, yet CARB does not consider the impacts of ZEV weight on PM emissions from tire wear and entrained road dust. It is reasonably foreseeable that ZEVs will be heavier than the internal combustion engine vehicles (ICEVs) currently on the road. According to a report by the American Transportation Research Institute (ATRI), battery electric vehicles (BEVs) weigh more than their ICEV counterparts largely due to the significant battery sizes required for M/HDVs. For example, the GREET vehicle weight distribution assumptions for Class 8 Sleeper Cabs lists the battery weight has 17,108 pounds (lbs), for a total BEV weight of 32,016 lbs in comparison to the ICEV which weighs 18,216 lbs.[5]

Given that this weight increase far outpaces the 2,000 lbs allowance under Assembly Bill 2061 for alternative fueled vehicles, either more vehicles will be required to transport goods or the weight threshold for vehicles will need to be further increased. If the former occurs, the increase in vehicle miles traveled (VMT) will result in an increase in PM emissions from tire wear and entrained road dust. If the latter occurs, the increased average vehicle weight will similarly result in an increase in PM emissions. CARB's own methodology for calculating entrained road dust emissions per VMT is dependent of the average vehicle weight on the road[6] and a 2016 study titled "Non-exhaust PM emissions from electric vehicles" concluded that increased vehicle weight leads to increased PM emissions from both tire wear and road dust.[7] Given that non-exhaust emissions account for over 90% or PM_{10} and 85% of $PM_{2.5}$ emissions from traffic, the effects of increased vehicle weight may be significant.

CARB's Initial Statement of Reasons (ISOR) for the proposed ACF regulation[8] states that the ZEV weight increase is only expected to impact 10% of vehicles; CARB provides no supporting evidence or analysis for this assertion. However, they do indicate that there will be a weight increase for some of these vehicles and despite having the tools to conduct this analysis, CARB has not considered or attempted to quantify the emissions impact from tire wear or entrained road dust. Until they do so, the CEQA analysis for the proposed ACF regulation remains incomplete.

[5] American Transportation Research Institute (ATRI). 2022. Understanding CO_2 Impacts of Zero Emission Trucks. May. Available here: https://truckingresearch.org/wp-content/uploads/2022/05/ATRI-Understanding-CO2-Impacts-of-Zero-Emission-Trucks-May-2022.pdf. Accessed: October 2022.

[6] CARB. 2021. Miscellaneous Process Methodology 7.9: Entrained Road Travel, Paved Road Dust. March. Available here: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/2021_paved_roads_7_9.pdf. Accessed: October 2022.

[7] Timmers, Victor and Peter Achten. "Non-exhaust PM emissions from electric vehicles". March 2016. Available here: http://www.soliftec.com/NonExhaust%20PMs.pdf. Accessed: October 2022.

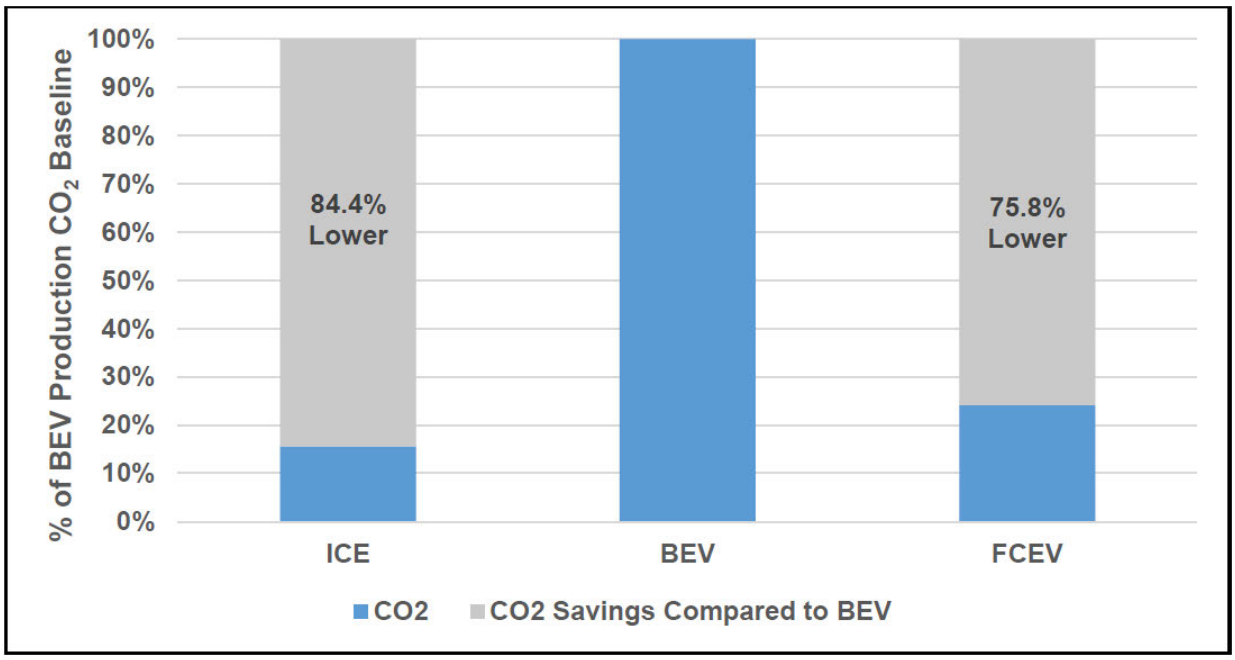
[8] CARB. 2022. Public Hearing to Consider the Proposed Advanced Clean Fleets Regulation. Staff Report: Initial Statement of Reasons. August 30. Available here: https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/isor2.pdf. Accessed: October 2022.

Incomplete Assessment of GHG Emissions Impacts

The proposed ACF regulation will result in a dramatic transition of both the vehicle and fuel systems in our transportation system, from ICEV to ZEVs and from diesel and gasoline to electricity and hydrogen. As a part of this CEQA analysis, CARB should properly estimate the GHG emission impacts of the proposed regulation by evaluating the full life cycle emissions of the M/HDVs affected by this proposal. However, CARB continues to ignore the GHG emissions associated with vehicle production and upstream emissions associated with fuel production and only estimates the reductions in tailpipe GHG emissions that would occur with the implementation of their proposal.

The ATRI study titled "Understanding CO_2 Impacts of Zero Emission Trucks"[9] compares the vehicle cycle emissions of ICEV, BEV, and fuel cell electric vehicles (FCEV) (**Figure 2**). Using the GREET model, the study determined that the manufacturing of battery electric Class 8 Sleeper Cabs would result in the 478,055 lbs of total CO_2 emissions per vehicle whereas the production of ICEVs emits 74,728 lbs per vehicle. The study also highlights that over the past decade, the U.S. has imported nearly 100% of the critical minerals needed for battery production from other countries, which likely contributes to the high GHG intensity of ZEV production.

Figure 2. Vehicle Cycle GHG Emissions of Class 8 Sleeper Cabs[10]



A CEQA analysis must include all potential impacts of a regulation, including the full life cycle GHG emissions of M/HDVs, even if portions of it occur outside the state of California. By not including such impacts in their analysis, CARB is misrepresenting the benefits of the proposed ACF regulation and CEQA alternatives.

[9] ATRI. 2022. Understanding CO_2 Impacts of Zero Emission Trucks. May. Available here: https://truckingresearch.org/wp-content/uploads/2022/05/ATRI-Understanding-CO2-Impacts-of-Zero-Emission-Trucks-May-2022.pdf. Accessed: October 2022.

[10] Ibid.

ATTACHMENT A
AUTHOR RESUMES

JULIA LESTER, PhD

Principal

Dr. Julia Lester has over 32 years of experience in air quality services. She joined ENVIRON (now Ramboll) in 2004, after more than 14 years at the South Coast Air Quality Management District (SCAQMD). She has substantial expertise in the preparation and review of California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents, particularly air emissions greenhouse gas and climate change impact, conformity, air quality and health risk assessments. She has conducted regulatory negotiations with many air agencies and supported clients, before city councils and in other public forums. She is a PhD Chemical Engineer and has the following air agency certifications: SCAQMD Certified Permitting Professional and San Joaquin Valley Air Pollution Control District Certified Air Permitting Professional. Her clients include local governments, California sea ports and goods movement operations, government agencies, wastewater / waste-to-energy facilities, industrial facilities, agricultural operations, and agencies/industries with specialized air regulatory challenges.

EXPERIENCE HIGHLIGHTS

- Prepared full CEQA Environmental Impact Report (EIR) for the City of Los Angeles Digester Gas Utilization Project (DGUP) at the Hyperion wastewater treatment plan certified in August 2013.
- Lead the Air Quality / Health Risk Assessment (AQ/HRA) for the I-710 Corridor Project between the San Pedro Bay Ports and the Downtown Los Angeles Railyards
- Prepared full CEQA EIR for the City of Los Angeles biosolids application at Green Acres Farm, certified in December 2014.
- Provided CEQA/NEPA and permitting/compliance/rule development assistance (analysis, documents, outside review) on several projects, including freeway projects in Central California and Los Angeles, an oil and gas production facility (CEQA Project Manager), waste-to-energy facilities (CEQA/NEPA, permitting, planning), a wastewater utility agency (permitting, compliance, planning assistance), sanitation district (CEQA, compliance, and regulatory negotiation), sea ports (CEQA/NEPA), and others.
- Provided expert services, declarations and/or testimony on several air quality-related hearing board and litigation matters.
- Provided City Council testimony on behalf of the City of Azusa during a mine development CEQA certification and the City of Cerritos (erroneously labeled the "air toxic hotspot" by USA).
- At the SCAQMD, prepared State Implementation Plans, conducted air quality modeling, developed particulate matter regulations (including first-in-the-nation rules).

CONTACT INFORMATION

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EDUCATION

PhD, Chemical Engineering, California Institute of Technology

MS, Chemical Engineering, California Institute of Technology

BS, Chemical Engineering, Purdue University

CREDENTIALS

Certified Permitting Professional – South Coast Air Quality Management District

Certified Air Permitting Professional – San Joaquin Valley Air Pollution Control District

SELECTED EXPERIENCE

Waste and Waste-to-Energy Projects – Air Quality and CEQA

- Prepared full CEQA Environmental Impact Report (EIR) for the City of Los Angeles Digester Gas Utilization Project (DGUP) at the Hyperion wastewater treatment plan that was certified in August 2013.
- Prepared full CEQA EIR for the City of Los Angeles biosolids application at Green Acres Farm that was certified in December 2014.
- Prepared an SCAQMD Certified Permitting Professional permit application for a novel biosolids waste-to-energy facility with state-of-the-art control equipment.
- Provided technical assistance to a sanitation district concerning new biosolids composting regulations and current biosolids management operations.
- Assistance to several landfill-gas-to-energy facilities with permitting and compliance issues in South Coast and Santa Barbara County.

Transportation and Goods Movement – Air Quality and CEQA Service

- Preparing the Air Quality / Greenhouse Gas / Health Risk Assessment for the I-710 Corridor Project Environmental Impact Report / Environmental Impact Study, the main goods movement truck corridor between the Ports of Los Angeles/Long Beach and the downtown railyards.
- Assisted the Ports of Long Beach and Los Angeles in the review, development and assessment of the San Pedro Bay Ports Clean Air Action Plan (CAAP) and related CAAP measures.
- Provided peer review services to the Port of Long Beach for air quality and health risk assessment analyses in draft CEQA and NEPA documents.
- Prepared a Negative Declaration for a port control technology implementation project at the Port of Long Beach.
- Prepared several assessments of port-related control technologies, strategies, and clean air plans.
- Assisted the San Diego Unified Port District (SDUPD) in the development of its Clean Air Program (CAP).

Particulate Matter Projects

- Assisted the Imperial County Air Pollution Control District in its 2009 and 2018 PM10 State Implementation Plan (SIP) development, including analysis of appropriate Best Available Control Measures (BACM) for fugitive dust, and exceptional events documentation. Assisted with Ozone SIP development, including analysis of Reasonably Available Control Technology (RACT) and Section 179(B) 'but-for' international emissions attainment demonstration.
- Assisted the Great Basin Unified Air Pollution Control District in its 2016 PM10 State Implementation Plan development for the Owens Valley, including analysis of significant sources and appropriate Best Available Control Measures (BACM) for fugitive dust.
- Conducted an independent third-party review of the fugitive dust controls, rule compliance and Environmental Impact Report assessments of a proposed large-scale aggregate mining operation for the City of Azusa. Included legal counsel support and City Council testimony.

General Permitting and Compliance Assistance

- Provided permitting, compliance and CEQA assistance (analysis and documents) to several facilities subject to air district regulations throughout California. Clients include an oil and gas production facility (CEQA Project Manager), waste-to-energy facilities (CEQA/NEPA, permitting, planning), a landfill gas-to-energy operator (multiple sites), a wastewater utility agency (permitting, compliance, planning assistance), sanitation district (CEQA, compliance, and regulatory negotiation), aggregate facilities, a glass manufacturer, a carpeting manufacturer, dairy and poultry farms, and others.

VARALAKSHMI JAYARAM

Senior Managing Consultant

Varalakshmi Jayaram is a Senior Managing Consultant in Ramboll's Air Quality Practice with over twelve years of experience in air quality management and climate change issues. She has substantial expertise in developing criteria air pollutant and greenhouse gas emission inventories, evaluating control technologies, air permitting and compliance including CEQA and NEPA, air dispersion modeling, and health risk assessments. Her clients span a broad range of industries including transportation agencies, seaports, airports, utilities, commercial and residential developers, and manufacturing facilities. She is a PhD Chemical and Environmental Engineer (UCR) and a Certified Permitting Professional in the South Coast Air Quality Management District (SCAQMD). She is currently serving as the Chair on FuturePorts Board of Directors. She also represents FuturePorts on the SCAQMD's Air Quality Management Plan Advisory Group.

COURSES/CERTIFICATIONS

Certified Permitting Professional - South Coast Air Quality Management District (N62101), 2012 - Present

MEMBERSHIPS

FuturePorts
Harbor Association of Industry and Commerce (HAIC)
Air and Waste Management Association (AWMA)

EXPERIENCE HIGHLIGHTS

- Prepared air quality, greenhouse gas, and health risk assessments (CEQA/NEPA) for several transportation, warehouse, and mixed-use development projects including but not limited to the I-710 Corridor Project, Brightline West Cajon Pass High-Speed Rail Project, K4 Warehouse and Cactus Channel Improvement Project, San Diego State University Mission Valley Campus Master Plan Project, Great Park Neighbourhoods and The Villages of Lakeview. This involved developing construction and operational criteria air pollutant and greenhouse gas inventories; developing and accessing AQ/GHG mitigation measures; performing air dispersion modeling to estimate ambient air quality impacts; estimating health risk impacts; preparing the air quality, health risk assessment, greenhouse gas, and energy technical reports; preparing the Air Quality and Greenhouse Gas sections of the Draft Environmental Impact Reports; addressing responses to comments received from the public, local agencies, and government agencies; and participating in public outreach meetings.
- Assisted with technical evaluations and comment development related to on-road vehicle policy and rulemaking, such as: California Air Resources Board's (CARB's) Mobile Source Strategy, Advanced Clean Trucks (ACT) Regulation, Advanced Clean Fleet (ACF)

CONTACT INFORMATION

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EDUCATION

2006-2011
PhD, Chemical & Environmental Engineering, University of California, Riverside, California, United States

2003-2005
MS, Mechanical Engineering, Ohio University, Athens, Ohio, United States

1999-2003
BTech, Chemical Engineering
Madras University, Chennai, India

Regulation, Advanced Clean Cars II (ACC II) Regulation, CARB's 2022 Draft Scoping Plan Update, and SCAQMD's Warehouse Indirect Source Rule with a focus on AQ, GHG, and cost analysis of emerging NZE/ZE vehicle (Low NOx, Battery Electric, Fuel Cell) and fuel (natural gas, electric, hydrogen) technologies for various clients.

- Provided peer review services for air quality, greenhouse gas, and health risk analyses for two large warehouse projects located in the inland empire. Developed air quality and greenhouse gas mitigation measure packages for these projects that included potential greenhouse gas, criteria air pollutant, and diesel particulate matter emission reductions associated for each mitigation measure option. The mitigation measure options spanned across a variety of emission sources including passenger cars, trucks, construction equipment, building energy use, water use, and vegetation.
- Prepared an air quality and health risk analysis protocol for CEQA/NEPA analyses of proposed projects at the Port of Long Beach. Provided peer review services for the Pier B On-Dock Rail Support Facility Project's air quality, greenhouse gas, and health risk analyses in the draft CEQA document.
- Evaluated the siting guidance established by California Air Resources Board in their 2005 Air Quality and Land Use Handbook for sensitive receptors near warehouses. This involved health risk assessments of warehouse scenarios using the latest emissions inventory model and risk assessment methodology.
- Provided AQ/GHG technical and regulatory assistance to Southern California Gas Company since 2016, including but not limited to: analyses and commenting assistance during SCAQMD and California Air Resources Board (CARB) rule development; analysis of multiple AQ (ambient/indoor) and GHG technical articles; commenting assistance during the development of the CEC's 2022 Energy Code and SCAQMD's 2022 Air Quality Management Plan, technical review of SCAQMD's Net Emissions Analysis Tool that estimates NOx/GHG benefits of residential appliance electrification, and development of a Residential Distributed Generation Comparison Tool that evaluates costs and emissions for a variety of power generation technologies/scenarios.
- Assisting the City of Commerce with the development of a Global Warming and Climate Change chapter for their General Plan update. This involves identifying the existing GHG emissions contributors within the City and developing GHG reduction goals, policies, and action items that target these contributors.
- Assisted Los Angeles Work Airports (LAWA) with technical analysis and update of their Alternative Fuel Vehicle Requirement Program that encourages the conversion of conventional diesel and gasoline fueled commercial vehicles operating in the airport to less polluting alternative fuel/vehicle technologies. This involved developing various options for a revised program and evaluating criteria air pollutant and GHG benefits for these options.
- Provided regulatory and technical assistance to the Los Angeles Metropolitan Transportation Authority (LA Metro) Advanced Transit Vehicle Consortium (ATVC) to evaluate the lifecycle cost and cost-effectiveness of near-zero and zero emission transit bus technologies. This analysis involved the development of life-cycle oxides of nitrogen (NO_X) and greenhouse gas (GHG) emissions associated with each near-zero and zero-emission technology. Technologies evaluated include: Low NO_X natural gas buses operating on renewable natural gas, battery electric buses charging at the bus depot only or charging in-route only, and hydrogen fuel cell buses that operate on hydrogen produced on-site by steam methane reformation of renewable natural gas or by electrolysis of water

EXHIBIT “B”

October 17, 2022

John P. Kinsey
Wanger Jones Helsley PC
265 E. River Park Cir., Suite 310
Fresno, CA 93720

Ref: Technical Review of Total Cost of Ownership (TCO) Discussion for the Advanced Clean Fleets Regulation (Appendix G, Posted on August 31, 2022 for the October 27, 2022 Board Hearing)

Dear Mr. Kinsey:

CleanFleets.net provides the following comments in our capacity as an advisor to truck fleet owners affected by CARB regulations. As Director, I have served the trucking industry since the CARB Diesel Risk Reduction Plan adoption in Year 2000 and have participated in the CARB zero emission (ZE) truck process since the initial "Last Mile Delivery" vehicle workshop in 2016. Our firm currently serves more than 100 trucking fleets with consulting services relating to CARB regulatory compliance and advanced technology options. As such, I have gained expertise in how trucking companies prepare to evaluate and deploy trucks, particularly those in the High Priority and Federal Fleets (HPF) category.

The Executive Summary of the TCO analysis concludes, "[I]n summary, the results show that battery-electric vehicles appear cost competitive with the established combustion technologies by 2025 in a variety of use cases." The assumptions used to reach this conclusion are overly optimistic, unsupported by the underlying evidence, and do not reflect real world data prepared by the National Renewable Energy Laboratory (NREL) over the past eight years of ZE bus demonstrations. Throughout the TCO document, CARB relies upon unproven forecasts that truck fleet operators affected by the ACF would experience favorable economic results from switching from internal combustion engine (ICE) trucks to ZE trucks. If this were true, and we do not believe it is, then no purchase mandate would be needed as the basic laws of supply and demand would drive both for-profit fleets and budget-conscious municipalities to move to ZE trucks as rapidly as possible. In any event, the TCO analysis is not supported by empirical data known to CARB and therefore the proposed regulation does not adequately identify the cost impact to businesses affected by the proposed ACF.

1. The TCO assumptions are incorrect based on the ZE trucks manufacturers' statements made in the past year on the draft TCO and CARB has failed to validate those assumptions as requested by the manufacturers. Furthermore, in the Environmental Assessment (EA) for ACF, CARB staff rejected a common-sense proposal from the manufacturers to match their CARB-mandated supply (per the ACT Regulation) with the consumer purchase requirements proposed in this ACF.

The Truck & Engine Manufacturers Association (EMA) has communicated to CARB the state of ZE trucks:

> "Unfortunately, compared to traditional vehicles, ZEVs currently (i) cost a trucking company more to purchase, (ii) are not able to perform the same amount of work as traditional trucks, (iii) require new maintenance facilities and equipment investments, (iv) have lower residual values, and (v) require the build-out and maintenance of a completely new electricity charging or hydrogen fueling infrastructure."[1]

Commercial trucks are highly customized specialty vehicles that HPF-affected fleets must rely on to profitably serve customers. The costs to regulated fleets to address and overcome the barriers above are not adequately explained in the TCO. The most glaring examples of "inaccurate assumptions" were noted by EMA:

- ZEV purchase costs that are too low.
- ZEV residual values are too high.
- No lost productivity to charge a ZEV.
- Average mileage will be adequate when trucks are often needed for peak operation.
- Charger costs based on power ratings that are too low for heavy trucks.
- No infrastructure costs for sleeper cab tractors.
- No maintenance costs for infrastructure."

Based on overly-optimistic assumptions, the draft cost discussion document concludes that cost parity between ZEVs and traditional vehicles will occur soon. We request that CARB validate the assumptions in the draft cost discussion documents by conducting ***case studies of the medium- and heavy-duty ZEV pilot and demonstration projects*** that are underway in California."[2] (emphasis added he EMA proposal to CARB, titled *"Alternative 5: Match ACT and ACF ZEV Deployments Exactly"* in the EA, was rejected with inadequate analysis in our view. As stated in the EA:

> "The basic concept would require fleets to purchase ZEVs on a schedule that matches the number of ZEV sales required by the ACT regulation starting with the 2024 model year. This alternative would shift where ZEV sales occur but would result in no more ZEVs nor NZEVs than the baseline nor what would otherwise be expected under the No Project Alternative. This alternative would increase administrative burden to implement the fleet requirements and would primarily distribute costs between manufacturers and regulated fleets without increasing ZEV and without achieving any new emissions reductions."

[1] See Truck & Engine Manufacturers Association comments filed with CARB today at https://www.arb.ca.gov/lists/com-attach/105-acf-comments-ws-V2VUYlBjVjRSC1Bh.pdf
[2] See Truck & Engine Manufacturers Association comments filed with CARB today at https://www.arb.ca.gov/lists/com-attach/105-acf-comments-ws-V2VUYlBjVjRSC1Bh.pdf

First, the "baseline" is a figment of CARB staff imagination and not reflective of what the manufacturers have indicated they can (or will) produce. One need only look at the Advanced Clean Trucks adoption by CARB in 2020 to verify this. Prior to adoption, CARB staff proposed higher percentages of sales than the manufacturers stated they could produce. So the "baseline" established in the ACT is not grounded in reality, but rather by wishful thinking and we see no evidence in the record that the "baseline" percentages can be met due to the statements of the manufacturers themselves. It appears that the EMA's Alternative 5 would be to match the ambitious increase percentages adopted at the last minute by the CARB Board prior to adoption. To reject this Alternative with the justification that it, "would result in no more ZEVs nor NZEVs than the baseline…," is not reasonable given that the baseline set by the ACF does not reflect the capacity of the manufacturers to produce ZEVs (e.g. the monumental task of extracting critical minerals and refining those into ZEV batteries). In very simple terms, economic disruption is lessened when the supply of a product and the consumer demand for the product are similar. Due to many factors explained by EMA during the ACT Regulation,[3] "beachheads" represent ZE vehicle types for specific customers that are more suitable for manufacturing and use by fleet customers. The initial production required for the ACT when adopted was in the tens of thousands of ZE trucks. With the "100 Percent" proposal in this ACF that manufacturing appears to now be over 500,000 ZE trucks. CARB has failed to provide a thorough analysis or identify the basis for the conclusion that the manufacturing supply chain will produce hundreds of thousands of ZE vehicles ***in excess of*** what the manufacturers have indicated they can produce.

2. The CARB Board did receive and take testimony on September 22, 2022 from NREL on a multi-year ZE bus evaluation that further demonstrates the TCO for ACF uses assumptions not supported by the facts.[4]

Since EMA made the comments above nearly a year ago, NREL issued its final report on the demonstration project at Foothill Transit. In the introduction to NREL's Final Report, NREL states indicates that, "Foothill Transit is collaborating with the California Air Resources Board (CARB) and the
U.S. Department of Energy's (DOE's) National Renewable Energy Laboratory (NREL) to evaluate the buses in revenue service. The focus of the evaluation is to compare performance and cost of the BEBs [Battery-Electric Buses] to that of conventional technology in similar service and track progress over time."

A brief review of the Final Report shows the TCO does not reflect real world experience such as Foothill Transit. For instance, in comparing a compressed natural gas (CNG) ICE fleet to a ZE bus fleet, the Foothill results do not support the TCO's conclusions:

[3] See https://ww2.arb.ca.gov/applications/public-comments?p=comm&s=bccommlog&l=act2019
[4] Jeffers, Matthew and Leslie Eudy. 2021. Foothill Transit Battery Electric Bus Evaluation: Final Report. Golden, CO: National Renewable Energy Laboratory. NREL/TP-5400- 80022. https://www.nrel.gov/docs/fy21osti/80022.pdf.

- More costly fuel: CNG fuel compared to diesel equivalent basis shows that *electricity is 5-6.5 times more expensive* than CNG fuel, depending on the time of year. The TCO, in contrast, erroneously assumes that CNG and electricity are equally expensive.
- Increased maintenance costs: After removing accident- and warranty-related items for both fleets, the average per-mile maintenance cost was $0.50/mi for the BEB 35FC fleet, $0.56/mi for the BEB 40FC fleet, and $0.32/mi for the CNG fleet, compared to the assumptions of maintenance cost savings for ZEVsin the TCO;
- More vehicle downtime: In the Arcadia Fleet, BEB 40E2 fleet was available 81.9% of time and CNG available 93.5% of time. Unfortunately, there is no mention of vehicle downtime in the TCO, but it is common knowledge that the lack of vehicle reliability translates into more vehicles needed to accomplish the work. Stated another way, if nearly 20% of a battery electric fleet is down at any given time than additional vehicles are needed to maintain the same service level. This cost should be included in the TCO and for that reason the TCO is incomplete.

None of these facts indicate to a reasonable person that heavy duty ZE vehicles are cheaper to own and operate and are reliable as the TCO states.

3. The TCO understates and downplays the upfront costs of ZE trucks and includes predictions for ZE truck cost reductions that are not supported

The TCO shows the cost as follows: “Class 8 Refuse Packer – Battery-Electric $299,932.” Media reports, however, show that the cost of a similar Class 8 Refuse Packer are actually around $600,000.[5] As a measure of the incremental cost of a ZE truck versus diesel, the CARB Hybrid Voucher Incentive Program (HVIP) has stated that its incentive amount can cover that incremental cost. A check of the HVIP website lists ZE vehicle incentives for Class 7-8 vehicles in the range of $85,000 to $240,000.[6] The Table 5: New Vehicle Price Forecast in the TCO shows a maximum of $98,000 in cost difference for the heaviest Class 8 vehicles. The TCO should be substantially revised because its estimates for the price of new ZE vehicles are underestimated. We have noted the same issue with other vehicle types and CARB provides no quotes or validation for the completed vehicle examples modeled in the TCO. There is a lack of transparency to the consumer as it relates to heavy duty ZEVs. Unlike conventional trucks, the consumer can go to the OEM website (e.g. Ford) and view what the MSRP is of vehicles.

[5] An electric garbage truck? Zero-emission rigs look to go mainstream - The San Diego Union-Tribune (sandiegouniontribune.com)
[6] https://californiahvip.org/vehicles/

The TCO also predics decreasing BEV costs. However, these conclusions are entirely undermined by statements from the industry. For example, an August 9, 2022 announcement from Ford Motor Company gave notice of a $7,000 or more price increase for Ford Motor Company's Lightning pickup. As explained in the announcement, "Due to significant material cost increases and other factors, Ford has adjusted MSRP starting with the opening of the next wave of F-150 Lightning orders." Similarly, in June 2022, Tesla (TSLA) announced that it "has significantly increased the prices of its electric cars across its entire lineup with some models going up by as much as $6,000."[7] Lighter duty ZEVs have been in production for several decades and have not reached price parity with their gasoline counterparts so the conclusion that ZE trucks will be close in cost to conventional vehicles is not supported by the facts.

In conclusion, the TCO assumptions are incorrect based on the ZE trucks manufacturers' statements and data collected by NREL in collaboration with CARB. The NREL study metrics should be included in the TCO. Finally, because the upfront cost of ZE trucks is downplayed, the calculated "payback period" is not valid and is not reliable. All of these factors indicate that the TCO does not meet the requirements of the Administrative Procedures Act as it is incomplete, inaccurate and does not disclose the cost impact to businesses.

Sincerely,

Sean R. Edgar
Director

[7] See "Ford Increases Lightning Base Price For Second Time In Two Months" https://www.motor1.com/news/614555/ford-lightning-price-increase/#:~:text=In%20August%2C%20Ford%20announced%20it%20was%20increasing%20the,at%20%2453%2C769%20with%20the%20%241%2C795%20destination%20fee%20included. and "Tesla (TSLA) significantly increases its electric car prices across its lineup," at https://electrek.co/2022/06/15/tesla-tsla-increases-electric-car-prices-across-lineup/

Air Resources Regulatory Experts

Sean Edgar
Director

Sean R. Edgar has thirty years of public policy development and field experience in transportation, construction and air quality projects for clients in both the public and private sectors. Mr. Edgar gained experience in the public policy arena while serving in the Office of Governor Pete Wilson. There he participated in the formation of the California Environmental Protection Agency in 1991-1993.

In the 1990's Mr. Edgar joined International Technology (IT) Corporation where he managed 25 field personnel in the closure of Hamilton Army Airfield in Marin County, California. For two years, he coordinated waste storage, packaging, transportation, and disposal for the US Department of Energy at Lawrence Livermore National Laboratory. Mr. Edgar was the owner's representative for the closure of the West Contra Costa Sanitary Landfill involving earthwork over 40 acres of the landfill site.

For the past 25 years, Mr. Edgar's consulting practice has consisted of association management and regulatory advocacy relating to transportation and air quality issues. Mr. Edgar has an established presence at the California Air Resources Control Board (CARB) since the September 2000 adoption of the Diesel Risk Reduction Plan (DRRP) and has participated in every major on-road and off-road rulemaking for more than twenty years. Among his other accomplishments, he represented the private solid waste collectors (California Refuse & Recycling Council) in the development and implementation of the CARB Solid Waste Collection Vehicle Rule, the first private carrier rule enacted by CARB. In 2009 Mr. Edgar was appointed by CARB to their Truck Regulations Advisory Committee. In 2011 he was authorized by CARB through a competitive bid process to train business owners about CARB rules. In the past nine years he has educated more than 6,000 fleet owners in six western states through over 150 personal appearances. He is a recognized expert regarding on-road fleet rule implementation and technology options. In 2016 Mr. Edgar was appointed to the CARB Advanced Clean Local Trucks Committee that resulted in the Advanced Clean Trucks Regulation approved by CARB in June 2020. In 2019 he was named Technical Director for the CARB Diesel Filter Replacement Grant Program which resulted in the distribution of $3 million in grant funds to repair or replace recalled emission systems for public agencies and private fleet owners. As Director he supervises the firm's staff of six professionals servicing more than 200 public and private fleet owners with regulatory compliance services.

Mr. Edgar holds a Bachelor of Arts degree in Political Science from the University of California at Berkeley. Additionally, in 2006 he earned an Air Quality Management Certificate from California State University Fresno Extension and has completed substantial technical training and continuing education in the fields of environmental law and regulation, hazardous materials management, and occupational safety and health. He is fluent in Spanish and is a resident of Sacramento, California.

ATTACHMENT “F”

ATTACHMENT B. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
Aesthetics: Impact 1-1: Short-Term Construction-Related Effects Potentially significant	**Mitigation Measure 1-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, and regulations, and policies that provide protection of aesthetic resources. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with discretionary local land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the local government Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by lead agencies with project-approval authority. Recognized practices routinely required to avoid and/or minimize impacts to aesthetic resources include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body shall certify that the environmental document was prepared in compliance with applicable regulations and approve the project for development.	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	• Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. • The project proponent would color and finish the surfaces of all project structures and buildings visible to the public to ensure that they: (1) minimize visual intrusion and contrast by blending with the landscape; (2) minimize glare; and (3) comply with local design policies and ordinances. The project proponent would submit a surface treatment plan to the lead agency for review and approval. • To the extent feasible, the sites selected for use as construction staging and laydown areas shall be areas that are already disturbed and/or are in locations of low visual sensitivity. Where possible, construction staging and laydown areas for equipment, personal vehicles, and material storage shall be sited to take advantage of natural screening opportunities provided by existing topography and vegetation. • All construction areas shall be kept clean and tidy, including areas of disturbed soils and recent vegetation plantings, and storage shall be screened from view and/or are generally not visible to the general public. • Projects and their associated elements will be sited to avoid prominent landscape features, and national historic sites, national trails, and cultural resources. • The project proponent shall prepare and implement a construction lighting mitigation plan and submit the plan to	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	the local jurisdiction for review. The plan shall describe the measures to be used to reduce the visibility of on-site construction lighting from neighboring properties.	
Aesthetics: Impact 1-2: Long-Term Operational-Related Effects Potentially significant	**Mitigation Measure 1-2** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of aesthetic resources. CARB does not have the authority to require implementation of mitigation measures related to the construction of new or modified facilities in response to the Proposed Project that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with discretionary local land use and/or permitting authority. New or modified facilities in California would likely qualify as a "project" under CEQA and, thus, require environmental review. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices routinely required to avoid and/or minimize impacts to aesthetic resources include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek land use entitlements for development of the facilities, including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body shall certify that the environmental	Potentially Significant and Unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	document was prepared in compliance with applicable regulations and approve the project for development. • The project proponent shall color and finish the surfaces of all project structures and buildings visible to the public to ensure that they: (1) minimize visual intrusion and contrast by blending with the landscape; (2) minimize glare; and (3) comply with local design policies and ordinances. The project proponent shall submit a surface treatment plan to the lead agency for review and approval. • Siting projects and their associated elements next to prominent landscape features or in a setting for observation from national historic sites, national trails, and cultural resources shall be avoided to the greatest extent. • The project proponent shall prepare and implement a lighting mitigation plan and submit the plan to the local jurisdiction for review. The plan shall describe the measures to be used to reduce visibility of on-site lighting from neighboring properties.	
Agriculture and Forestry Resources: Impact 2-1: Short-Term Construction-Related and Long-Term Operation-Related Effects Potentially significant	**Mitigation Measure 2-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of agricultural and forest resources. CARB does not have the authority to require implementation of mitigation measures related to new or modified facilities or infrastructure that would be approved by other State agencies or local jurisdictions. The ability to require such mitigation measures is within the purview of jurisdictions with discretionary land use approval and/or permitting authority. Project-specific impacts and mitigation would	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	be identified during the project review process and carried out by agencies with discretionary project approval authority. Recognized practices routinely required to avoid and/or minimize construction-phase impacts to agriculture and forest resources include: Proponents of new or modified facilities constructed because of reasonably foreseeable compliance responses would coordinate with local or State land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local or State land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. Based on the results of the environmental review, project proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project because CARB has no land use authority, mitigation is not within its purview to reduce potentially significant impacts to less-than-significant levels. Any mitigation specifically required for a new or modified facility would be determined by the local lead agency and future environmental documents by local and State lead agencies should include analysis of the following: • Avoid lands designated as Important Farmland (State defined Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) as defined by the Farmland Mapping and Monitoring Program. Before converting Important Farmland to non-agricultural use, analyze the feasibility of	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	using farmland that is not designated as Important Farmland prior to deciding on the conversion of Important Farmland. • Avoid lands designated as forest land or timberland before converting forestland or timberland to non-forest use, analyze the feasibility of using other lands prior to deciding on the conversion of forest land or timberland. • Any mitigation for permanent conversion of Important Farmland caused by facility construction or modification shall be completed prior to the issuance of a grading or building permit by providing the permitting agency with written evidence of completion of the mitigation. Mitigation may include but is not limited to: ▪ Permanent preservation of off-site Important Farmland of equal or better agricultural quality, at a ratio of at least 1:1. Preservation may include the purchase of agricultural conservation easement(s); purchase of credits from an established agricultural farmland mitigation bank; contribution of agricultural land or equivalent funding to an organization that provides for the preservation of Important Farmland towards the ultimate purchase of an agricultural conservation easement. ▪ Participation in any agricultural land mitigation program, including local government maintained, that provides equal or more effective mitigation than the measures listed. • Any mitigation for permanent conversion of forest land or timberland caused by facility construction or modification shall be completed prior to the issuance of a grading or building permit by providing the permitting agency with	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	written evidence of completion of the mitigation. Mitigation may include but is not limited to permanent preservation of forest land or timberland of equal or better quality at a ratio of 1:1 or 1.5:1 because some lost ecological value may not be replaceable. Preservation may include purchase of easements or contribution of funds to a land trust or other agency.	
Air Quality: Impact 3-1: Short-Term Construction-Related Effects Potentially significant	**Mitigation Measure 3-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of air quality. CARB does not have the authority to require implementation of mitigation measures related to new or modified facilities that would be subject to project approval by local jurisdictions. The ability to require such measures is within the purview of jurisdictions with local or state land use approval and/or permitting authority. New or modified facilities in California would likely qualify as a "project" under CEQA, because they would generally need a discretionary public agency approval and could result in a physical change in the environment. The jurisdiction with primary approval authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA. Project-specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority. Recognized practices routinely required to avoid and/or minimize impacts to air quality include the following: • Proponents of new or modified facilities constructed as a result of reasonably foreseeable compliance responses would coordinate with local or state land use agencies to	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local jurisdiction with land use authority would determine that the environmental review process complied with CEQA and other applicable regulations, prior to project approval. • Based on the results of the environmental review, proponents would implement all feasible mitigation identified in the environmental document to avoid or substantially lessen the construction-related air quality impacts of the project. • Project proponents would apply for, secure, and comply with all appropriate air quality permits for project construction from the local agencies with air quality jurisdiction and from other applicable agencies, if appropriate, prior to construction mobilization. • Project proponents would comply with the federal Clean Air Act and the California Clean Air Act (e.g., New Source Review and Best Available Control Technology criteria, if applicable). • Project proponents would comply with local plans, policies, ordinances, rules, and regulations regarding air quality-related emissions and associated exposure (e.g., construction-related fugitive dust regulations and indirect source review). • For projects that exceed applicable PM thresholds, prepare and comply with a dust abatement plan that addresses	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	emissions of fugitive dust during construction and operation of the project.	
Air Quality: Impact 3-2: Long-Term Operation-Related Effects Beneficial	N/A	N/A
Biological Resources: Impact 4-1: Short-Term Construction-Related Effects Potentially significant	**Mitigation Measure 4-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of biological resources. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed construction project for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority. Recognized practices that are routinely required to avoid and/or minimize impacts to biological resources include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant biological impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency. • Preparation of a biological inventory of site resources by a qualified biologist prior to ground disturbance or construction. If protected species or their habitats are present, comply with applicable federal and State Endangered Species Acts and regulations. Ensure that important fish or wildlife movement corridors or nursery sites are not impeded by project activities. • Preparation of a wetland survey of onsite resources. Establish setbacks and prohibit disturbance of riparian habitats, streams, intermittent and ephemeral drainages, and other wetlands. Wetland delineation is required by Section 404 of the Clean Water Act and is administered by the U.S. Army Corps of Engineers. • Prohibit construction activities during the rainy season with requirements for seasonal weatherization and implementation of erosion prevention practices. • Prohibit construction activities in the vicinity of raptor nests during nesting season or establish protective buffers and	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	provide monitoring as needed to ensure that project activity does not cause an active nest to fail. • Preparation of site design and development plans that avoid or minimize disturbance of habitat and wildlife resources, and prevents stormwater discharge that could contribute to sedimentation and degradation of local waterways. Depending on disturbance size and location, a National Pollution Discharge Elimination System (NPDES) construction permit may be required from the California State Water Resources Control Board.	
Biological Resources: Impact 4-2: Long-Term Operation-Related Effects Potentially significant	**Mitigation Measure 4-2** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of biological resources. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority. Recognized practices that are routinely required to avoid and/or minimize impacts to biological resources include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant biological impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency. • Prohibit vegetation management activities in the vicinity of raptor nests during nesting season or establish protective buffers and provide monitoring as needed to ensure that project activity does not cause an active nest to fail. • Maintain site design and development plan features that avoid or minimize disturbance of habitat and wildlife resources, and prevents stormwater discharge that could contribute to sedimentation and degradation of local waterways during project operation. ▪ Maintain and replace, as needed, replacement trees and permanently protected suitable habitat identified during the construction phase of the project.	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
Cultural Resources: Impact 5-1: Short-Term Construction-Related and Long-Term Operation-Related Effects Potentially significant	**Mitigation Measure 5-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of cultural resources. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority. Recognized practices that are routinely required to avoid and/or minimize impacts to cultural resources include: • Proponents of construction activities implemented as a result of reasonably foreseeable compliance responses associated with the proposed project would coordinate with State or local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local or State land use agency or governing body must follow all applicable environmental regulations as part of approval of a project for development. • Based on the results of the environmental review, proponents would implement all feasible mitigation to reduce or substantially lessen the potentially significant impacts on cultural resources associated with the project.	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	• Actions required to mitigate potentially significant cultural impacts may include the following; however, any mitigation specifically required for a modified facility would be determined by the local lead agency. • Retain the services of cultural resources specialists with training and background that conforms to the U.S. Secretary of Interior's Professional Qualifications Standards, as published in Title 36, Code of Federal Regulations, part 61. • In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find shall cease and a qualified cultural resource specialist (e.g., archaeologist, architectural historian, depending on the resource identified) meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. • If a resource determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the project applicant to avoid disturbance to the resources, and if complete avoidance is not possible, follow accepted professional standards in recording any find Preservation in place is the preferred manner of mitigating impacts to archaeological sites. • Regulated entities shall define the area of potential effect (APE) for each project, which is the area where project construction and operation may directly or indirectly cause	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	alterations in the character or use of historic properties. The APE shall include a reasonable construction buffer zone and laydown areas, access roads, and borrow areas, as well as a reasonable assessment of areas subject to effects from visual, auditory, or atmospheric impacts, or impacts from increased access. • Regulated entities shall retain the services of a paleontological resources specialist with training and background that conforms with the minimum qualifications for a vertebrate paleontologist as described in Measures for Assessment and Mitigation of Adverse Impacts to Non-Renewable Paleontological Resources: Standard Procedures, Society of Vertebrate Paleontology, 1995.[1] • Regulated entities shall conduct initial scoping assessments to determine whether proposed construction activities, if any, could disturb formations that may contain important paleontological resources. Whenever possible, potential impacts to paleontological resources should be avoided by moving the site of construction or removing or reducing the need for surface disturbance. The scoping assessment shall be conducted by the qualified paleontological resources specialist in accordance with applicable agency requirements. • If human remains or funerary objects are encountered during any activities associated with the project, work in the	

[1] Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. 2010. Available: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed May 20, 2022.

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	immediate vicinity and within a reasonable buffer zone, shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. • The regulated entity's qualified paleontological resources specialist shall determine whether paleontological resources would likely be disturbed in a project area on the basis of the sedimentary context of the area and a records search for past paleontological finds in the area. The assessment may suggest areas of high known potential for containing resources. If the assessment is inconclusive a surface survey is recommended to determine the fossiliferous potential and extent of the pertinent sedimentary units within the project site. If the site contains areas of high potential for significant paleontological resources and avoidance is not possible, prepare a paleontological resources management and mitigation plan that addresses the following steps: ▪ A preliminary survey (if not conducted earlier) and surface salvage prior to construction. ▪ Physical and administrative protective measures and protocols such as halting work, to be implemented in the event of fossil discoveries. ▪ Monitoring and salvage during excavation. ▪ Specimen preparation. ▪ Identification, cataloging, curation and storage. ▪ A final report of the findings and their significance. ▪ Choose sites that avoid areas of special scientific value.	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
Energy Demand: Impact 6-1: Short-Term Construction-Related Effects Less than significant	N/A	N/A
Energy Demand: Impact 6-2: Long-Term Operation-Related Effects Beneficial	N/A	N/A
Geology and Soils: Impact 7-1: Short-Term Construction-Related and Long-Term Operational-Related Effects Potentially significant	**Mitigation Measure 7-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies that provide protection of geology and soils. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority. Recognized practices that are routinely required to avoid and/or minimize impacts to geology and soils include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant geology and soil impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency. • Prior to the issuance of any development permits, proponents of new manufacturing plants and hydrogen fueling stations would prepare a geotechnical investigation/study, which would include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils including shrink-swell potential (expansion), soil resistivity, slope stability, minerals resources and the presence of hazardous materials. • Proponents of new manufacturing plants and hydrogen fueling stations would provide a complete site grading plan, and drainage, erosion, and sediment control plan with applications to applicable lead agencies. Proponents would avoid locating facilities on steep slopes, in alluvial fans and other areas prone to landslides or flash floods, or with gullies or washes, as much as possible.	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
Greenhouse Gas Emissions and Climate Change: Impact 8-1: Short-Term Construction-Related Effects Less than significant	N/A	N/A
Greenhouse Gas Emissions and Climate Change: Impact 8-2: Long-Term Operational-Related Effects Beneficial	N/A	N/A
Hazards and Hazardous Materials: Impact 9-1: Short-Term Construction-Related Effects Potentially significant	**Mitigation Measure 9-1** The Regulatory Setting in Attachment A includes, but is not limited to, applicable laws, regulations, and policies related to hazards and hazardous materials. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with discretionary local land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	approval authority. Recognized practices that are routinely required to avoid upset and accident-related impacts include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant upset and accident-related hazard impacts may include as discussed below; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency. • Handling of potentially hazardous materials/wastes shall be performed by or under the direction of a licensed professional with the necessary experience and knowledge to oversee the proper identification, characterization, handling and disposal or recycling of the materials generated as a result of the project. As wastes are generated, they shall be placed, at the direction of the licensed professional, in designated areas that offer secure, secondary containment and/or protection from storm water	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	runoff. Other forms of containment may include placing waste in steel bins or other suitable containers pending profiling and disposal or recycling. • The temporary storage and handling of potentially hazardous materials/wastes shall be in areas away from sensitive receptors such as schools or residential areas. These areas shall be secured with chain-link fencing or similar barrier with controlled access to restrict casual contact from non-project personnel. All project personnel that may encounter potentially hazardous materials/wastes shall have the appropriate health and safety training commensurate with the anticipated level of exposure.	
Hazards and Hazardous Materials: Impact 9-2: Long-Term Operation-Related Effects Potentially Significant	**Mitigation Measure 9-2: Implement Mitigation Measure 9-1** The authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with this EA does not attempt to address project-specific details of mitigation. As such, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts.	Potentially Significant and Unavoidable
Hydrology and Water Quality: Impact 10-1: Short-Term Construction-Related Effects Potentially significant	**Mitigation Measure 10-1** The Regulatory Setting in Appendix A includes, but is not limited to, applicable laws, regulations, and policies in regard to hydrology and water quality. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local discretionary land use and/or permitting authority. New or	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	modified facilities in California would qualify as a "project" under CEQA. The jurisdictions with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices that are routinely required to avoid and/or mitigate hydrology and water quality-related impacts include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant hydrology and water quality impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency. Implement Best Management Practices to reduce sedimentation and pollution of surface waters, such as	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	installation of silt fencing around the perimeter of active construction areas. • Train construction workers for proper response to hazardous materials spills as well as responsibilities for maintaining BMPs on site. • Drainage plans for runoff shall be designed to contain adequate capacity for projected flows on site. Avoid filling of waters of the U.S. and waters of the State to the extent feasible. If activities require a Waste Discharge Requirements under Title 27 CCR, section 20005 et seq. or Clean Water Act Section 401 Water Quality Certification, comply with all avoidance, reduction, and compensatory measures.	
Hydrology and Water Quality: Impact 10-2: Long-Term Operation-Related Effects Potentially significant	**Mitigation Measure 10-2: Implement Mitigation Measure 10-1** The authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with this EA does not attempt to address project-specific details of mitigation. As such, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts.	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
Land Use Planning: Impact 11-1: Short-Term Construction-Related and Long-Term Operational-Related Effects No impact	N/A	N/A
Mineral Resources: Impact 12-1: Short-Term Construction-Related and Long-Term Operation-Related Effects Less than significant	N/A	N/A
Noise: Impact 13-1: Short-Term Construction-Related Noise Effects Potentially significant	**Mitigation Measure 13-2** The Regulatory Setting in Appendix A includes, but is not limited to, applicable laws, regulations, and policies that pertain to noise. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local discretionary land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices that are routinely required to avoid and/or minimize noise include:	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	• Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA) The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant noise impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency • Equip all emergency pressure relief valves and steam blow-down lines with silencers to limit noise levels. • Contain facilities within buildings or other types of effective noise enclosures. Employ engineering controls, including sound-insulated equipment and control rooms, to reduce the average noise level in normal work areas.	
Noise: Impact 13-2: Long-Term Operational-Related Effects Potentially significant	**Mitigation Measure 13-2** The Regulatory Setting in Appendix A includes, but is not limited to, applicable laws, regulations, and policies that pertain to noise. CARB does not have the authority to require implementation of	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local discretionary land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices that are routinely required to avoid and/or minimize noise include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA) The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant noise impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	• Equip all emergency pressure relief valves and steam blow-down lines with silencers to limit noise levels. • Contain facilities within buildings or other types of effective noise enclosures. Employ engineering controls, including sound-insulated equipment and control rooms, to reduce the average noise level in normal work areas.	
Population and Housing: Impact 14-1: Short-Term Construction-Related and Long-Term Operational-Related Effects Less than significant	N/A	N/A
Public Services: Impact 15-1: Short-Term Construction-Related and Long-Term Operational-Related Effects Less than significant	N/A	N/A
Recreation: Impact 16-1: Short-Term Construction-Related and Long-Term Operational-Related Effects Less than significant	N/A	N/A
Transportation: Impact 17-1: Short-Term Construction-Related Effects Potentially significant	**Mitigation Measure 17-1** The Regulatory Setting in Appendix A includes, but is not limited to, applicable laws, regulations, and policies related to transportation. CARB does not have the authority to require implementation of mitigation related to new or modified facilities	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with discretionary land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices that are routinely required to avoid and/or minimize construction traffic impacts include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant traffic impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency.	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	• Minimize the number and length of access, internal, service and maintenance roads and use existing roads when feasible. • Provide for safe ingress and egress to/from the proposed project site. Utilize flaggers where necessary to control traffic at site entrances during construction. • Prepare a Construction Traffic Control Plan and a Traffic Management Plan. • Encourage carpooling to the site. Avoid materials deliveries during peak traffic periods.	
Transportation: Impact 17-2: Long-Term Operational-Related Effects Potentially significant	**Mitigation Measure 17-2** The Regulatory Setting in Appendix A includes, but is not limited to, applicable laws, regulations, and policies related to transportation. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with discretionary land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices that are routinely required to avoid and/or minimize construction traffic impacts include:	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	• Identify and implement road and intersection design requirements or improvements for any proposed or significantly impact roads and intersections. • Consult with and implement recommendations from local fire protection services regarding emergency access requirements. • Prepare transportation demand management plans that prioritize and promote use of non-automobile forms of transportation to minimize significant increases in VMT.	
Tribal Cultural Resources: Impact 18-1: Short-Term Construction-Related and Long-Term Operational Impacts Potentially significant	**Mitigation Measure 18-1** The Regulatory Setting in Attachment A includes applicable laws and regulations that relate to TCRs. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be approved by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with local or State land use approval and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary approval authority over a proposed action is the lead agency, which is required to review the proposed action for compliance with CEQA statutes. Project specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority. Recognized practices routinely required to avoid and/or minimize impacts on TCRs include: • Proponents of construction activities implemented as a result of reasonably foreseeable compliance responses associated with the 2022 Scoping Plan would coordinate with State or local land use agencies to seek entitlements for	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	development including the completion of all necessary environmental review requirements (e.g., CEQA). The local or State land use agency or governing body must follow all applicable environmental regulations as part of approval of a project for development. • Based on the results of the environmental review, proponents would implement all feasible mitigation to reduce or substantially lessen the potentially significant impacts on TCRs associated with the project. • Actions required to mitigate potentially significant TCR impacts may include the following; however, any mitigation specifically required for a modified facility would be determined by the local lead agency: ▪ Retain the services of culturally and geographically affiliated California Native American tribes. ▪ Seek guidance from archaeological resource specialists with training and background that conforms to the U.S. Secretary of the Interior's Professional Qualifications Standards, as published in 36 CFR Part 61. ▪ Seek guidance from the State and local lead agencies, as appropriate, for coordination of government-to-government consultations with the Native American tribes. ▪ Follow notification procedures and conduct consultation as required with California Native American tribes under AB 52 (including PRC Sections 21080.3.1 and 21080.3.2). Provide notice to Native American tribes of project details to identify potential TCRs. In the case that a TCR is identified,	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	consistent with PRC Section 21084.3(b), prepare mitigation measures that: – Avoid and preserve the resource in place. – Treat the resource with culturally appropriate dignity. – Employ permanent conservation easements. – Protect the resource. • Regulated entities shall consult with lead agencies early in the planning process to identify the potential presence of cultural properties. The agencies shall provide the project developers with specific instruction on policies for compliance with the various laws and regulations governing cultural resources management, including coordination with regulatory agencies and Native American tribes.	
Utilities and Service Systems: Impact 19-1: Long-Term Operational-Related Effects Potentially significant	**Mitigation Measure 19-1** The Regulatory Setting in Appendix A includes, but is not limited to, applicable laws, regulations, and policies related to utilities and service systems. CARB does not have the authority to require implementation of mitigation related to new or modified facilities that would be subject to approval by local jurisdictions. The ability to require such measures is under the purview of jurisdictions with discretionary land use and/or permitting authority. New or modified facilities in California would qualify as a "project" under CEQA. The jurisdiction with primary permitting authority over a proposed action is the Lead Agency, which is required to review the proposed action for compliance with CEQA statutes. Project-specific impacts and mitigation would be identified during the environmental review by agencies with discretionary project-approval authority. Recognized practices that are routinely	Potentially significant and unavoidable

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	required to avoid and/or minimize utility and service-related impacts include: • Proponents of new or modified facilities constructed as a compliance response to the Proposed Project would coordinate with local land use agencies to seek entitlements for development including the completion of all necessary environmental review requirements (e.g., CEQA). The local land use agency or governing body would certify that the environmental document was prepared in compliance with applicable regulations and would approve the project for development. • Based on the results of the environmental review, proponents would implement all mitigation identified in the environmental document to avoid or substantially lessen the environmental impacts of the project. The definition of actions required to mitigate potentially significant utility or service-related impacts may include the following; however, any mitigation specifically required for a new or modified facility would be determined by the local lead agency. • Comply with local plans and policies regarding the provision of water supply, wastewater treatment, and storm water drainage utilities, and solid waste services. • Where an on-site wastewater system is proposed, submit a permit application to the appropriate local jurisdiction and include the application with applications to appropriate lead agencies. • Where appropriate, prepare a Water Supply Assessment (WSA) consistent with the requirements of Section 21151.9	

Resource Area Impact Significance before Mitigation	Potential Mitigation	Significance after Mitigation
	of the Public Resources Code/ Section 10910 et seq. of the Water Code. The WSA would be approved by the local water agency/purveyor prior construction of the project. Comply with local plans and policies regarding the provision of wastewater treatment services.	
Wildfire: Impact 20-1: Short-Term Construction-Related and Long-Term Operation-Related Effects Less than significant	N/A	N/A

ATTACHMENT “G”

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May 22, 2024

VIA EMAIL

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Re: AB617 Truck Reroute Study

Dear Ms. Aguilar:

I am writing to submit comments on the South Central Fresno AB 617 Community Truck Reroute Study: Truck Routing and Implementation Strategies Report (April 2024) (the "Report"). My law firm represents numerous businesses and landowners within and adjacent to boundary of the South Central Fresno Community identified in the maps accompanying the Report, many of which will be directly affected by the recommendations and strategies in the Report. To ensure the City of Fresno remains competitive in its ability to attract high-quality businesses, while at the same time promoting strategies that foster a healthy and respectful interface between those businesses and the neighborhoods they inhabit, several modifications to the Report are required.

A. The Report Should Be Amended to Include Arterials Adjacent to Properties Currently Occupied by Warehouse/Industrial Uses, Including Elm Avenue

Figure 4 of the Report illustrates the location of Proposed Truck Routes in South Central and Southwest Fresno. Although the City's General Plan designates Elm Avenue as an "arterial," and over 800,000 square feet of relatively new warehouse/industrial development exists along Elm Avenue between E. Vine Avenue and North Avenue, Figure 4 shows Elm Avenue deleted as a Truck Route. These light industrial/warehouse properties are also located in a "Proposed Truck Regulated Area."

Elm Avenue should be maintained as a Truck Route, and the area immediately to the west of S.R. 41 should be removed as a Proposed Truck Regulated Area. By removing Elm Avenue as a Truck Route, the Report ignores the reality that Elm Avenue is lined on both sides by long-standing light industrial and warehouse land uses whose businesses rely in large part on truck trips.[1] Moreover, it makes very little practical sense to include most of the land adjacent to S.R. 41 within the Proposed Truck Regulated Area, as the land bounded by S.R. 41, E. Vine Avenue, Elm Avenue, and E. North Avenue contains no residential areas or sensitive receptors. (*Cf.* Report at 8 ["The addition of truck regulated areas aims to reduce the number of truck routes present in residential areas."].)

I understand the City asserts that the removal of Elm Avenue as a Truck Route is only intended to limit bypass trips on Elm Avenue, and that the City does not intend to prohibit trips to a business from a freeway. While that might be accurate, my clients are concerned that the lack of a Truck Route adjacent to or near their properties and their location in a Truck Regulated Area will be used in the future by project opponents, the City, and other public agencies to assert that affected landowners and businesses should be denied discretionary approvals. They are likewise concerned about potential arguments that their present and future operations are inconsistent with the City's plan-level documents and policies, as well as the air pollution and exposure reduction strategies included in the AB 617 Community Emission Reduction Program. The City should at a minimum provide assurances that the location of a business within a Truck Regulated Area and/or the lack of an adjacent Truck Route shall not be used to limit, deny, or discourage an otherwise lawful land use.

In addition, from a practical perspective, eliminating arterials upon which significant industrial businesses are currently located as Truck Routes may actually impede the primary objectives of the Report. Specifically, one of the core objectives of the Report is the identification and prioritization of infrastructure designed to improve the interface between industrial and residential land uses—*i.e.*, the installation of bike lanes, crosswalks, sidewalks, and

[1] The same is true of other arterials, including E. Central Avenue, on which numerous light industrial land uses are located.

signage; the elimination of queuing; fixing damaged street surfaces and potholes; and synchronizing traffic signals. All areas within South Central Fresno that will continue to experience truck traffic should be prioritized for these improvements; however, by eliminating some of those areas—such as Elm Avenue—as Truck Routes, improvements that would benefit both residents and business owners are less likely to be identified, funded, and implemented. Rather than recommending the removal of Truck Routes on arterials where trucks are currently operating, and will continue to operate in the future, the Report should instead acknowledge existing and likely future conditions, and prioritize improvements in areas that could benefit most from those improvements.

B. The Lack of Linear East-West Bypass Routes South of S.R. 180 Will Result in Longer Vehicle Trips and More Trucks on Local Roadways

When the truck rerouting study was initially proposed, the San Joaquin Valley Air Pollution Control District asserted the Report would have "indirect benefits" if "the results of the study identify feasible alternative truck routes that have the potential to reduce resident's [*sic*] exposure to emissions from heavy-duty vehicles without shifting emissions to another community or resulting in a significant impact to regional air quality through an increase in vehicle miles traveled (VMT) . . . ." (See San Joaquin Valley Air Pollution Control District Project Plan: South Central Fresno Community Emission Reduction Plan: HD.11 Heavy Duty Truck Rerouting at 3.)

Now that the Report has been released, this does not appear to be the case. Specifically, Figure 4 does not designate any east-west corridors as Truck Routes south of S.R. 180. This would eliminate the capability of trucks driving eastbound or westbound to drive through portions of the City without being forced to take lengthy detours, resulting in an increase in VMTs. For example, a truck traveling eastbound on Jensen Avenue (from the direction of Kerman) would be forced to turn right on Marks Avenue, going approximately two miles out of the way, before heading in an eastbound direction again on E. Central Avenue; however, because E. Central Avenue east of S.R. 41 is not designated as a Truck Route, the truck would then have to travel two miles northbound on S.R. 41 to get back to Jensen Ave. This is inefficient, contrary to the objectives of AB 617, and makes little practical sense. To the extent the Report recommends the elimination of all east-west corridors south of S.R. 180, the Report should be augmented to include an assessment of whether the location of the proposed Truck Routes and Truck Regulated Areas would increase VMTs.

C. The Report Should Not Include the New Recommendation that Would Mandate Deployment of Zero-Emissions Trucks

Based on recommendations contained in the UC Merced Health Impact Assessment, I understand the Report was recently modified to recommend that area businesses transition to Zero-Emissions Trucks. CARB has already adopted regulations such as the Advanced Clean Fleets regulation and the Advanced Clean Truck regulation to foster the transition to ZEVs, and any effort by the City to adopt similar regulations would substantially overlap with CARB's

generally-applicable regulations. This would at best be a wasteful effort that is largely duplicative of CARB's efforts. However, there is a greater danger that the City could create conflicting regulatory requirements that would result in confusion and extensive compliance costs for regulated industry. This is of particular concern since ZEVs (i) are not widely available; (ii) are vastly more expensive than trucks with combustion engines, (iii) cannot carry the same load as a truck with a combustion engine; and (iv) would require extensive infrastructure upgrades (both at individual project sites and across California's roadway network).

To the extent the Report includes a recommendation to mandate ZEVs, the Report should be expanded to address the potential unintended consequences of such a mandate, including:

- Impacts associated with the increased number of ZEVs needed to haul the same amount of goods compared to combustion engines, including the impact of the increased number of ZEVs would have on VMTs.

- Because ZEVs are heavier than trucks with combustion engines, the impacts of such a mandate on the upkeep of local roadways.

- The economic and environmental impacts associated with area businesses being required to upgrade their facilities to accommodate ZEVs, including charging infrastructure.

- The economic impact on area businesses required to purchase ZEVs on an accelerated timetable.

- The availability (or lack thereof) of ZEVs in the marketplace.

- Whether regional charging infrastructure exists to accommodate ZEVs at this time, and when such infrastructure may be developed.

It is also questionable whether the City has the legal authority to require businesses to use zero emissions vehicles. Under Section 209(a) of the Clean Air Act, states and their political subdivisions are preempted from adopting or attempting to enforce standards relating to the control or emissions from new motor vehicles. (See *Engine Mfrs. Ass'n v. S. Coast Air Quality Mgmt. Dist.* (2004) 541 U.S. 246.) While states, such as California, can seek a waiver of 209(a)'s preemptive effect, Section 209's waiver provisions apply only to states—not their political subdivisions.

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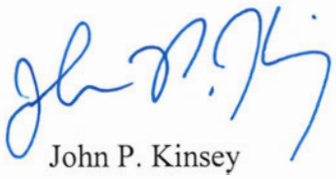
D. Conclusion

Thank you for your consideration of these important comments.

Respectfully submitted,



John P. Kinsey