

EMFAC Modeling Change Technical Memo

SUBJECT: REDISTRIBUTION OF HEAVY-HEAVY DUTY DIESEL TRUCK VEHICLE MILES TRAVELED IN CALIFORNIA

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Background

The EMFAC model requires information about the activity and emission factors from a wide range of vehicle types in order to estimate emissions. One of the vehicle types that EMFAC estimates emissions for is heavy-heavy duty diesel trucks. A heavy heavy-duty diesel truck (HDDT) is defined in EMFAC as a truck having a gross vehicle weight (GVW) equal to or greater than 33,000 pounds, that operates on diesel fuel. These vehicles are generally sixteen wheel, five-axle big rigs that pull containers, flatbeds, or other large cargo. The majority of these trucks are used for long-hauls (>100 miles) although some, such as those servicing the Ports of Los Angeles, Long Beach, and Oakland may travel shorter distances per trip.

In the EMFAC model, councils of government (COGs) or municipal planning organizations (MPOs) provide assumptions for vehicle miles traveled (VMT) in all vehicle classes in each region. These total VMT estimates are generated using socio-economically based travel demand models, and validated using regional traffic count data. The estimates are generated for all vehicle classes, and do not provide estimates for individual vehicle classes.

The Air Resources Board is responsible for allocating regional VMT to each vehicle class, including HDDTs. The current version of EMFAC allocates HDDT VMT based upon where trucks are registered. While the registration VMT distribution is appropriate for passenger cars as well as light and medium heavy duty trucks and heavy-heavy duty gasoline trucks, HDDTs travel extensively outside their registration counties either picking up or delivering goods. The goal of this technical change is to generate a VMT distribution for HDDTs that more accurately reflects their driving patterns in California. This memorandum details the analysis performed by ARB staff to generate a HDDT VMT distribution to support this technical change.

Summary of Changes

This technical memorandum describes the redistribution of HDDT VMT from a registration to a travel basis. The redistribution of HDDT VMT was estimated using a combination of data from a survey conducted by California Department of Transportation (Caltrans) in 1999, and modeled information from MVSTAFF, an annual report developed by Caltrans.

Table 1 compares the distribution of total statewide VMT by air basin. Throughout the document “Current” refers to EMFAC2007 draft version 2.221 and “Proposed” refers to EMFAC2007 draft version 2.222. As the table shows, the allocation of VMT to each air

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basin changed as a result of the redistribution. There is also a change in the total HHDDT VMT for the State as there was a change in the accrual rates for HHDDT. Generally, less populated air basins with considerable through traffic, such as Mojave Desert, North East Plateau, Salton Sea and Great Basin Valleys, showed the greatest increase in HHDDT VMT as a result of the distribution. HHDDT VMT in the San Joaquin Valley increased by 83% in 2000. After the redistribution, the San Joaquin Valley now has nearly a third of the statewide total HHDDT VMT. More heavily populated areas, such as the San Diego, San Francisco, South Central Coast and South Coast air basins showed decreases in HHDDT VMT. In general, EMFAC2002 is likely to allocate more HHDDT VMT to urban areas where the vehicles are registered. The proposed redistribution correctly allocates more HHDDT VMT to areas with high heavy-heavy duty diesel truck traffic volumes, which tend to be rural areas with heavy through traffic. Figure 1 shows the Percent change in HHDDT VMT for all Air Basins for the year 2010.

**Table 1. Comparison of Current and the Proposed HHDDT VMT
(1000 miles/day) by Air Basin**

Air Basin	2000			2010			2020		
	Current	Proposed	Percent Difference	Current	Proposed	Percent Difference	Current	Proposed	Percent Difference
Great Basin Valley	35	152	334%	49	128	161%	69	172	149%
Lake County	23	12	-48%	32	13	-59%	50	20	-60%
Lake Tahoe	13	19	46%	19	25	32%	18	37	106%
Mojave Desert	362	4063	1022%	589	4547	672%	1003	6949	593%
Mountain Counties	254	481	89%	406	516	27%	537	745	39%
North Central Coast	600	477	-21%	783	543	-31%	1057	814	-23%
North Coast	316	375	19%	346	414	20%	454	554	22%
Northeast Plateau	74	393	431%	143	325	127%	236	431	83%
Sacramento Valley	2229	2576	16%	2679	2937	10%	2927	4258	45%
Salton Sea	444	1762	297%	619	2007	224%	958	3345	249%
San Diego	1807	1016	-44%	2704	1302	-52%	3511	1827	-48%
San Francisco	4164	2107	-49%	4680	2542	-46%	5572	3397	-39%
San Joaquin	4245	7780	83%	5950	8636	45%	8075	12885	60%
South Central Coast	634	351	-45%	934	421	-55%	1224	604	-51%
South Coast	8900	5389	-39%	11677	6733	-42%	16127	9508	-41%
Total	24100	26953	12%	31610	31089	-2%	41818	45546	9%

Tables 2, 3 and 4 provide the NOx, PM, and ROG emissions impact of the redistribution on HHDDT emissions by air basin in 2000, 2010, and 2020, respectively. As shown in Table 2, year 2010 NOx emissions decrease by 44% in the South Coast Air Basin and 49% in the Bay Area as a result of the distribution. At the same time, NOx emissions in the San Joaquin Valley increase by 46%, in the Mojave Desert increase by 557%, and in the Salton Sea Air Basin increase by 161%. HHDDT emissions of other pollutants, and of all pollutants in future years, follow these trends. As a result of the redistribution, the San Joaquin Valley has the highest HHDDT emissions between 2000 and 2020.

Figure 1. Proposed Heavy-Heavy Duty Diesel VMT (x1000) and Percent Change Relative to EMFAC 2002 for the Year 2010

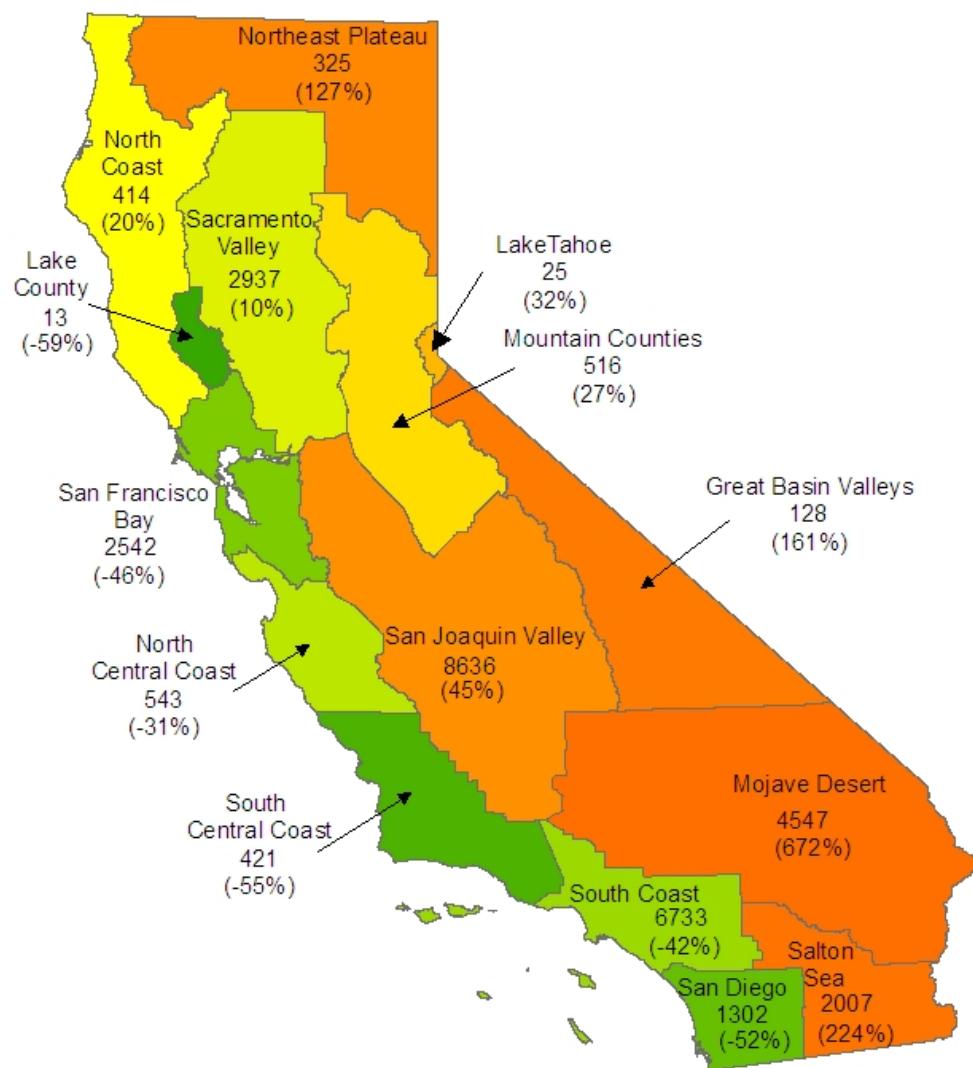


Table 4. Impact of Proposed Redistribution on Annual Average ROG Emissions (Tons/Day) from HHDDT by Air Basin

Air Basin	2000			2010			2020		
	Current	Proposed	Diff, %	Current	Proposed	Diff, %	Current	Proposed	Diff, %
Great Basin Valleys	0.03	0.12	300%	0.02	0.07	250%	0.02	0.04	100%
Lake County	0.02	0.01	-50%	0.02	0.01	-50%	0.01	0	-100%
Lake Tahoe	0.01	0.01	0%	0.01	0.01	0%	0	0.01	NA
Mojave Desert	0.31	2.81	806%	0.37	2.05	454%	0.28	1.33	375%
Mountain Counties	0.24	0.37	54%	0.21	0.26	24%	0.13	0.16	23%
North Central Coast	0.50	0.37	-26%	0.41	0.27	-34%	0.25	0.17	-32%
North Coast	0.29	0.29	0%	0.25	0.21	-16%	0.15	0.12	-20%
Northeast Plateau	0.08	0.31	288%	0.08	0.19	138%	0.06	0.11	83%
Sacramento Valley	1.63	2.02	24%	1.25	1.53	22%	0.69	0.92	33%
Salton Sea	0.41	1.28	212%	0.43	0.93	116%	0.34	0.63	85%
San Diego	1.47	0.83	-44%	1.27	0.65	-49%	0.79	0.42	-47%
San Francisco	3.02	1.65	-45%	2.5	1.3	-48%	1.31	0.74	-44%
San Joaquin Valley	3.41	6.10	79%	3.08	4.41	43%	1.95	2.72	39%
South Central Coast	0.46	0.26	-43%	0.4	0.21	-48%	0.25	0.12	-52%
South Coast	5.81	3.87	-33%	5.28	3.22	-39%	3.25	1.95	-40%
Total	17.69	20.30	15%	15.58	15.32	-2%	9.48	9.44	0%

Data Analysis Approach

To generate a HHDDT VMT distribution that more accurately reflects real-world driving patterns in California, a combination of survey and modeled data were used. The primary data source for the HHDDT VMT redistribution was a heavy duty truck survey conducted for Caltrans in 1999 (Caltrans, 2001a). Survey data were used to estimate the fraction of HHDDT VMT traveled in each county in California. These data were evaluated against MVSTAFF, an annual publication by Caltrans. Results compared well. To apply this new HHDDT VMT distribution, the total VMT traveled by HHDDT in California was estimated, as well as the accrual rates and age distribution by model year in EMFAC for the state as a whole. The potential for changes in the VMT distribution over time was also assessed, and a forecasting/backcasting methodology for the VMT redistribution was developed. This methodology is described below.

Survey Data and Analysis

Caltrans conducted a Heavy Duty Truck travel survey to collect representative truck travel data in California. Truck survey data collection took place through assisted interviews of 8,287 truck drivers at a total of 33 locations including weight stations, agricultural inspection stations, and roadside rest areas (Caltrans, 2001a). The survey included origin/destination data for each truck trip, but did not include measured VMT for each trip or the truck as a whole. Origin/destination data were analyzed to estimate VMT in each county of California associated with survey responses. Approximately, 7300 out of 8287 records had valid origins and destinations for HHDDT (Caltrans, 2001a). Non-valid records were omitted if it was impossible to determine a logical route

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between origin and destination. Using the valid truck trip records, trip routes, truck trip miles and total truck VMT by county using ESRI Network Analyst GIS software were estimated. The ARB methodology assumed the shortest path calculated by Network Analyst on the State Highway network provided by Caltrans. Based on recommendations from Caltrans, the following functional classes were used: Principal Arterial-Interstate, Other Principal Arterial, Minor Arterial, Major Collector and Minor Collector for Rural Areas and Principal Arterial-Interstate, Principal Arterial/Other freeways or Express ways, Other Principal Arterial, Minor Arterial, and Collector for Urban areas. Caltrans suggested that the roadways included in the above network would represent nearly all the roadways that would be used by the HHDD trucks. Table 5 provides the proposed VMT distribution percentage by county estimated using the Caltrans survey.

To validate the accuracy of the network analysis results, the results from a report titled "Heavy-Duty Truck Activity Data" by Battelle Memorial Institute (1999) were used. The report included second by second GPS data for various trips made in California. A subset of survey data with trip distances longer than 100 miles were selected. The mileage for these trips were calculated based on the second by second GPS data. ESRI Network Analyst GIS software was then used to map the predicted route based on the origination-destination locations for the same trip. Fig. 2 shows the correlation between the calculated mileage versus the estimated mileage by the Network Analyst for various trips. The VMT from surveyed data and the instrumented data were highly correlated, with a coefficient of 0.98. This indicated the approach using network analysis on the entire dataset of surveyed trucks was reasonable.

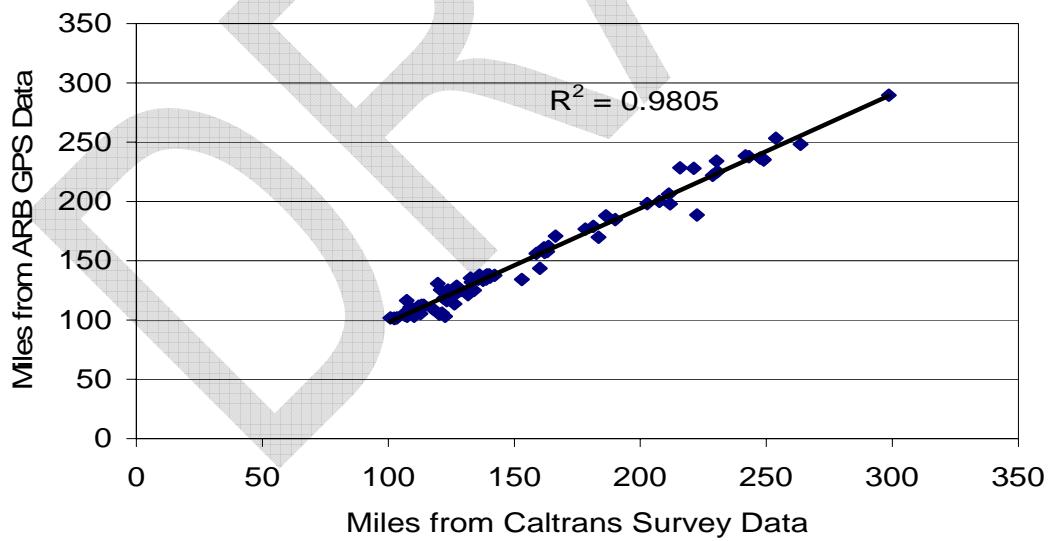


Figure 2. Correlation of Trip Distance between ARB GPS Data and Caltrans Survey Data

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Table 5. Proposed HHDDT VMT Redistribution by County in 2000

County Code	County	Proposed Redistribution, Percent of Total Statewide VMT	County Code	County	Proposed Redistribution, Percent of Total Statewide VMT
1	Alameda	3.61%	30	Orange	2.04%
2	Alpine	0.05%	31	Placer	1.46%
3	Amador	0.02%	32	Plumas	0.02%
4	Butte	0.90%	33	Riverside	10.79%
5	Calaveras	0.07%	34	Sacramento	1.91%
6	Colusa	0.45%	35	San Benito	1.06%
7	Contra Costa	1.17%	36	San Bernardino	12.84%
8	Del Norte	0.01%	37	San Diego	2.70%
9	El Dorado	0.06%	38	San Francisco	0.07%
10	Fresno	5.54%	39	San Joaquin	3.30%
11	Glenn	0.36%	40	San Luis Obispo	0.32%
12	Humboldt	0.41%	41	San Mateo	0.14%
13	Imperial	1.87%	42	Santa Barbara	0.33%
14	Inyo	0.30%	43	Santa Clara	1.64%
15	Kern	12.39%	44	Santa Cruz	0.08%
16	Kings	1.96%	45	Shasta	1.77%
17	Lake	0.04%	46	Sierra	0.01%
18	Lassen	0.01%	47	Siskiyou	1.44%
19	Los Angeles	11.94%	48	Solano	1.27%
20	Madera	1.01%	49	Sonoma	0.34%
21	Marin	0.14%	50	Stanislaus	2.57%
22	Mariposa	0.00%	51	Sutter	0.81%
23	Mendocino	0.61%	52	Tehama	1.34%
24	Merced	3.21%	53	Trinity	0.22%
25	Modoc	0.01%	54	Tulare	2.09%
26	Mono	0.21%	55	Tuolumne	0.00%
27	Monterey	0.63%	56	Ventura	0.65%
28	Napa	0.22%	57	Yolo	0.79%
29	Nevada	0.76%	58	Yuba	0.05%

Validation of Survey Data with MVSTAFF

The next step in estimating the distribution of HHDDT VMT in California was to compare staff's results with other published reports. The only report identified by staff was the Motor Vehicle Stock, Travel, and Fuels Forecast Report (MVSTAFF; Caltrans, 2001b). MVSTAFF is a recursive model maintained by Caltrans that predicts statewide VMT, fuel economy, and fuel consumption based on a variety of model inputs including the past 25-years of vehicle information (registration, fuel consumption, fuel economy, etc.) and socioeconomic parameters (population, income, economic growth rates, etc.). MVSTAFF provides VMT estimates by vehicle type and county; Caltrans generates an

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county-level VMT distributions were not normally distributed, a natural-log transformation of county specific HHDDT VMT percentages was used to form a normal distribution and facilitate statistical analysis.

Then, a linear regression analysis was performed between surveyed HHDDT VMT percentages and MVSTAFF VMT percentages. Figure 5 shows the relationship between HHDDT survey VMT and MVSTAFF VMT. Regression residuals from the relationship were normally distributed as shown in Figure 6, and homogeneously scattered as shown in Figure 7. These results support the statistical validity of the overall regression analysis.

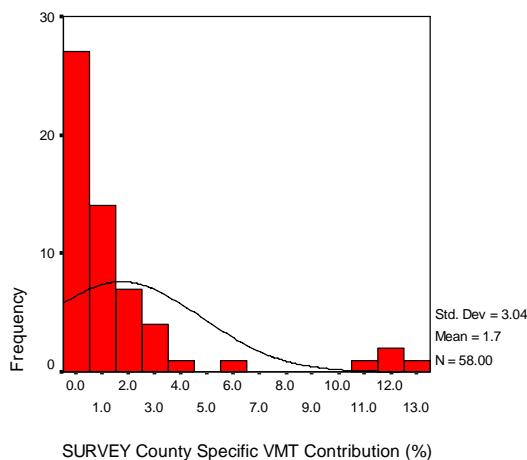


Figure 3. Survey County Specific VMT Contribution Distribution

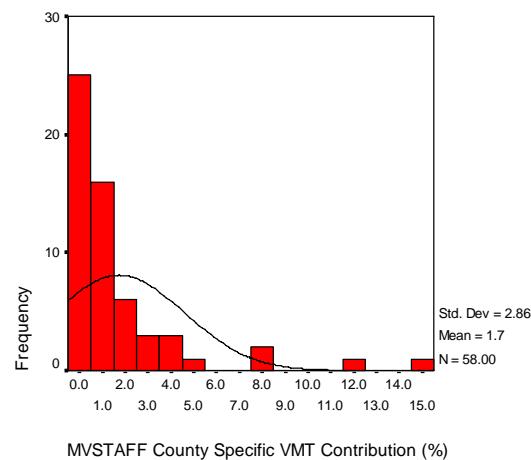


Figure 4. MVSTAFF County Specific VMT Contribution Distribution

If the Caltrans survey data and MVSTAFF provided identical results, the slope and R^2 values in Figure 5 would be 1.0. The regression analysis displayed in Figure 5 demonstrates that the slope is 1.19 with an R^2 value of 0.75. Results show MVSTAFF tends to weigh low traffic counties more heavily than the Caltrans survey data, and that the Caltrans survey data tends to weigh high traffic counties more heavily than MVSTAFF.

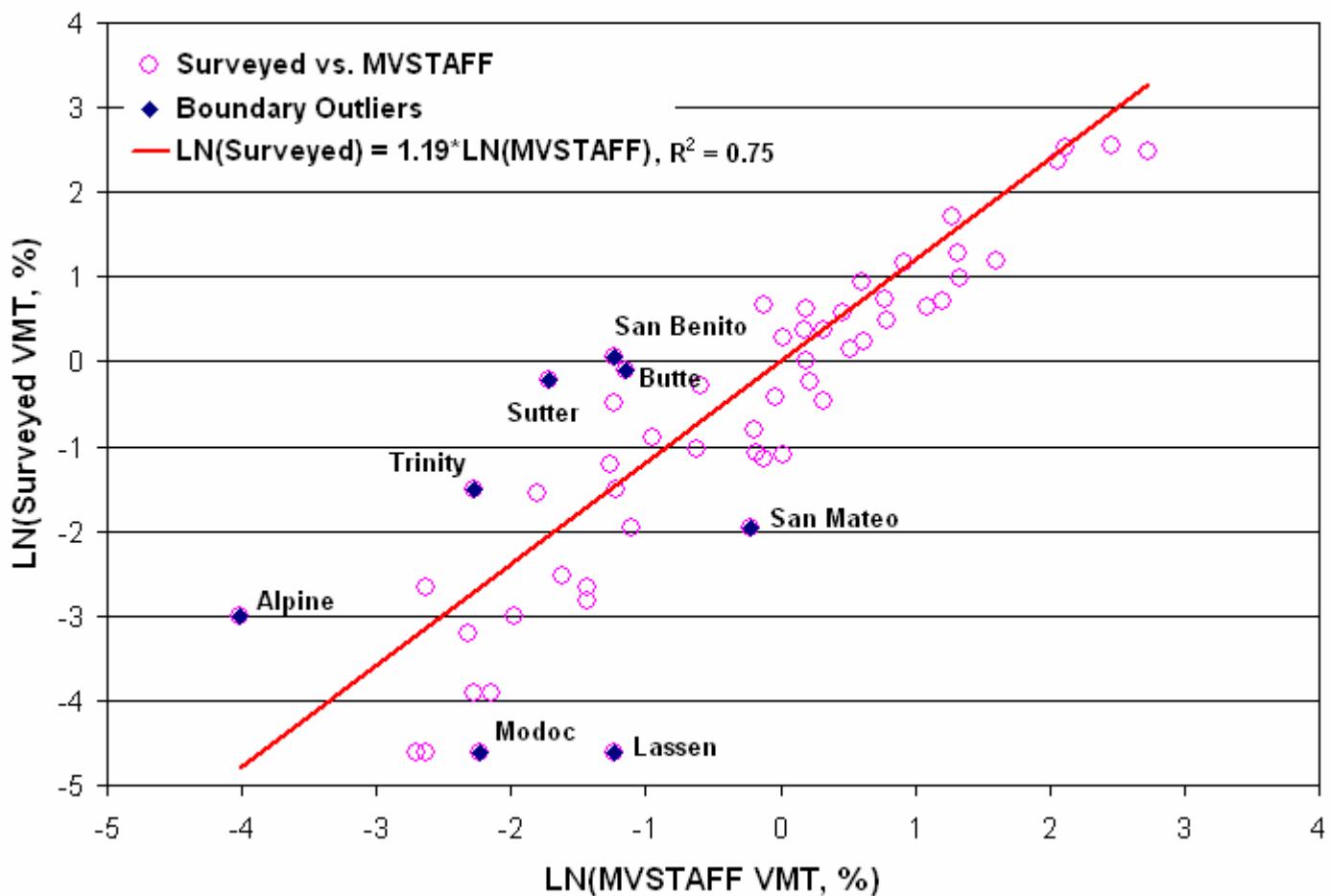


Figure 5. Correlation of County Specific VMT: Survey Data and MVSTAFF

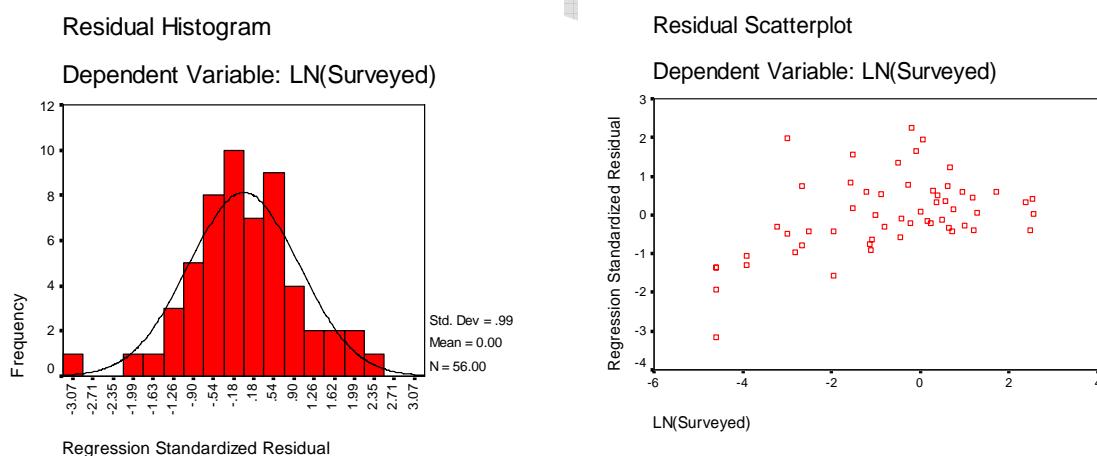


Figure 6. Residual Distribution of MVSTAFF-Survey Data Regression Model

Figure 7. Residual Scatter Distribution of MVSTAFF-Survey Data Regression Model

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Staff observed two outliers that exceeded 2 standard deviations (SD) from the regression: Lassen and Sutter Counties. Surveyed HHDDT VMT for Sutter County was 4.5 times greater than MVSTAFF VMT, while MVSTAFF HHDDT VMT for Lassen County was 29 times greater than surveyed VMT. There are many potential reasons for this discrepancy: small sample size in the survey may lead to a sample that does not represent the overall population, the highway network on which trucks travel in these areas may be relatively short, total VMT may be small, and other factors. In fact, total HHDDT VMT in these two counties represents less than one percent of total statewide HHDDT VMT, so while relative differences appear significant, absolute discrepancies are relatively small.

In general, counties that contributed a small percentage of overall statewide HHDDT VMT exhibited a higher standard deviation, and absolute differences between the survey and MVSTAFF were greater than for areas that received a relatively greater amount of traffic. Overall 22 of 58 counties contribute 88% of HHDDT VMT in California. As shown in Figure 8, survey data representing these counties correlate very strongly with MVSTAFF, with a nearly one to one relationship between the two data sources, and a correlation coefficient (R^2) of 0.85. These results further validate the proposed HHDDT VMT redistribution using the Caltrans survey.

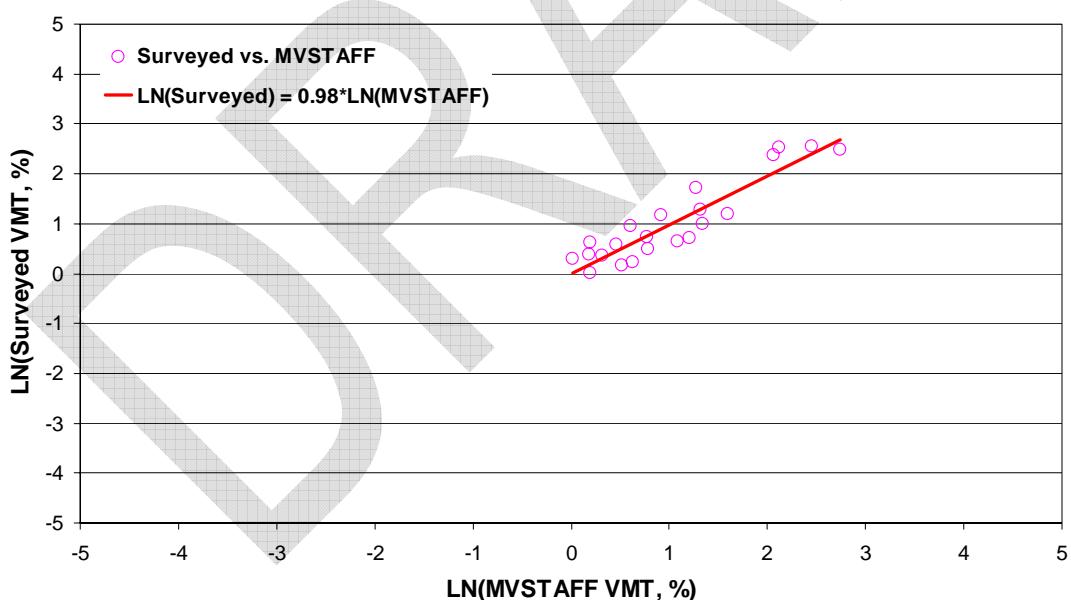


Figure 8. Correlation of County Specific VMT Contribution More than 1% between Caltrans Survey Data and MVSTAFF

Backcasting and Forecasting

The Caltrans survey provides a VMT distribution that represents one moment in time. However, emissions modeling requires understanding the distribution of HHDDT VMT both in the past and in the future. The proposed HHDDT distribution generated using the Caltrans survey was consistent with MVSTAFF. MVSTAFF generates both backcasts and forecasts for HHDDT VMT estimates, and accounts for different growth rates in different parts of the state. Staff evaluated MVSTAFF results for representing the years 1986 to 2001 for each county in California. Table 7 shows the percent of HHDDT VMT for several large counties in California for the years 1986, 1991, 1996 and 2001. Table 7 demonstrates that in general regional shares of statewide VMT are expected to decrease in urban areas such as Los Angeles and San Francisco, and increase in areas that experience significant through traffic such as the San Joaquin, Riverside, and San Bernardino Counties. Growth data are provided in Appendix A.

**Table 7. Percent of HHDDT VMT by Geographic Area and Calendar Year
(Caltrans Motor Vehicle Stock, Travel and Fuel Forecast, 2001)**

	1986	1991	1996	2001
Los Angeles	21.00%	18.21%	18.45%	16.70%
San Bernardino	9.50%	10.39%	9.79%	10.86%
Riverside	6.14%	8.35%	8.01%	8.02%
Orange	5.51%	5.13%	5.18%	4.90%
Kern	6.02%	6.26%	6.32%	7.35%
San Diego	4.93%	5.21%	5.55%	5.50%
San Joaquin	2.46%	3.18%	3.82%	4.28%
San Francisco	0.50%	0.39%	0.35%	0.25%

Recommended Modeling Changes

To integrate the proposed distribution of HHDDT VMT estimated using the Caltrans survey, the following changes to the model are proposed. First, the estimated total statewide population of trucks operating in California was estimated. Then a statewide accrual rate by age for HHDDT was developed. Finally, the redistribution based upon the Caltrans survey data and estimated growth rates was applied. This methodology is described below.

First, a statewide model year distribution of HHDDT based on registration data was generated. For EMFAC, vehicle population is estimated using vehicle registration that the ARB receives from the DMV annually. The 1999, 2000 and 2001 calendar year extractions were analyzed and population estimates updated in EMFAC2002 (ARB, 2002).

DMV entries of GVW were used, where available, to group vehicles into different classes. However, because this information is often not entered, vehicle reference books and vehicle identification number (VIN) data were used to match body type descriptions to manufacturer specified gross vehicle weights (ARB, 2002). In the final analysis, the class-specific vehicle population data is divided according to age (1-45) and geographic area (1-69) for inclusion in the model (ARB, 2002).

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In EMFAC2002, the HHDDT VMT in each area was calculated by taking the product of the registered truck population, out of state fraction, and accrual rates. This calculation was done on a model-year specific basis by region. The EMFAC2002 model assumed that 25% of total HHDDT VMT in California was generated by out-of-state trucks, based on a study by Jack Faucett Associates (1998). Since accrual rates were held constant in the model, the population was adjusted by a factor, 1.33, so that 25% of trucks operating in California were out-of-state trucks. EMFAC2002 also assumed that California trucks accrue all of their miles within California. Future updates to EMFAC will benefit from a current ARB re-evaluation of mileage accrual for in-state and out-of-state activity in California based on the Interstate Registration Program in progress.

Next, HHDDT accrual rates, as shown in Table 8, were developed. These accrual rates were generated based on data in the 1992 Truck Activity and Use Survey (U.S. Census Bureau, 1992), as cited in Jack Faucett Associates (1998). The total HHDDT VMT for a calendar year is the summation of the HHDDT VMT for each model year. The HHDDT VMT for each model year is the product of the number of HHDDT registered in a given area and the mileage accrual rates. Table 8 presents the HHDDT mileage accrual rates for each model year. The total truck population, adjusted for out-of-state trucks, was then redistributed based on the expected distribution of VMT in each county.

Table 8. HHDDT Mileage Accrual Rates by Age

HHDDT Age	Average miles/yr	HHDDT Age	Average miles/yr	HHDDT Age	Average miles/yr
1	80705	13	43854	25	16662
2	85152	14	39965	26	15164
3	86460	15	36504	27	13653
4	85386	16	33452	28	12136
5	82571	17	30772	29	10629
6	78547	18	28417	30	9159
7	73755	19	26335	31	7759
8	68546	20	24469	32	6467
9	63199	21	22764	33	5324
10	57926	22	21171	34	4369
11	52881	23	19645	35	3636
12	48169	24	18150	36-45	3636

Statewide population and VMT is allocated in accordance with the VMT distribution derived from the Caltrans survey for the year 2000 and allocated to previous and future years based on growth rates derived from MVSTAFF. Table 9 provides the VMT distribution by county for the year 2000 that was integrated into the model.

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APPENDIX A: Population Growth rates for the years 1969 - 2020



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Population Growth Rates for the years 1969 – 2020 (continued)

GAI	County (Air Basin/AQMD)	2018	2019	2020
1	Alpine (GBV)	0.01883	0.01848	0.01814
2	Inyo (GBV)	0.01148	0.01135	0.01122
3	Mono (GBV)	0.01610	0.01584	0.01559
4	Lake (LC)	0.02424	0.02367	0.02312
5	El Dorado (LT)	0.02405	0.02349	0.02295
6	Placer (LT)	0.02324	0.02271	0.02221
7	Amador (MC)	0.01044	0.01033	0.01023
8	Calaveras (MC)	0.02197	0.02149	0.02104
9	El Dorado (MC)	0.02405	0.02349	0.02295
10	Mariposa (MC)	0.01976	0.01937	0.01901
11	Nevada (MC)	0.01915	0.01879	0.01844
12	Placer (MC)	0.02324	0.02271	0.02221
13	Plumas (MC)	0.01010	0.01000	0.00990
14	Sierra (MC)	0.00701	0.00696	0.00691
15	Tuolumne (MC)	0.01927	0.01891	0.01856
65	Kern (MD)	0.02592	0.02527	0.02465
66	Riverside (MD/MDAQMD)	0.02933	0.02849	0.02771
67	Riverside (MD/SCAQMD)	0.02933	0.02849	0.02771
68	Los Angeles (MD)	0.01384	0.01365	0.01347
69	San Bernardino (MD)	0.02593	0.02527	0.02465
19	Del Norte (NC)	0.01940	0.01903	0.01868
20	Humboldt (NC)	0.00973	0.00964	0.00955
21	Mendocino (NC)	0.01828	0.01795	0.01763
22	Sonoma (NC)	0.01858	0.01824	0.01791
23	Trinity (NC)	0.01163	0.01150	0.01137
16	Monterey (NCC)	0.02302	0.02250	0.02201
17	San Benito (NCC)	0.02479	0.02419	0.02362
18	Santa Cruz (NCC)	0.02227	0.02178	0.02132
24	Lassen (NEP)	0.02120	0.02076	0.02034
25	Modoc (NEP)	0.01515	0.01492	0.01470
26	Siskiyou (NEP)	0.01354	0.01336	0.01318
59	Los Angeles (SC)	0.01384	0.01365	0.01347
60	Orange (SC)	0.01446	0.01425	0.01405

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GAI	County (Air Basin/AQMD)	2018	2019	2020
61	Riverside (SC)	0.02933	0.02849	0.02771
62	San Bernardino (SC)	0.02593	0.02527	0.02465
56	San Luis Obispo (SCC)	0.02424	0.02367	0.02312
57	Santa Barbara (SCC)	0.02053	0.02011	0.01972
58	Ventura (SCC)	0.01805	0.01773	0.01742
38	San Diego (SD)	0.01875	0.01840	0.01807
39	Alameda (SF)	0.01426	0.01406	0.01387
40	Contra Costa (SF)	0.01306	0.01290	0.01273
41	Marin (SF)	0.01038	0.01028	0.01017
42	Napa (SF)	0.01528	0.01505	0.01483
43	San Francisco (SF)	0.00345	0.00344	0.00343
44	San Mateo (SF)	0.01240	0.01225	0.01210
45	Santa Clara (SF)	0.01613	0.01587	0.01562
46	Solano (SF)	0.01935	0.01898	0.01863
47	Sonoma (SF)	0.01858	0.01824	0.01791
48	Fresno (SJV)	0.02039	0.01998	0.01959
49	Kern (SJV)	0.02592	0.02527	0.02465
50	Kings (SJV)	0.02340	0.02287	0.02235
51	Madera (SJV)	0.02966	0.02880	0.02800
52	Merced (SJV)	0.02272	0.02222	0.02174
53	San Joaquin (SJV)	0.02314	0.02261	0.02211
54	Stanislaus (SJV)	0.02403	0.02347	0.02293
55	Tulare (SJV)	0.02437	0.02379	0.02324
63	Imperial (SS)	0.03425	0.03311	0.03205
64	Riverside (SS)	0.02933	0.02849	0.02771
27	Butte (SV)	0.02381	0.02326	0.02273
28	Colusa (SV)	0.03469	0.03353	0.03244
29	Glenn (SV)	0.02916	0.02833	0.02755
30	Placer (SV)	0.02324	0.02271	0.02221
31	Sacramento (SV)	0.01870	0.01835	0.01802
32	Shasta (SV)	0.01832	0.01799	0.01767
33	Solano (SV)	0.01935	0.01898	0.01863
34	Sutter (SV)	0.02067	0.02025	0.01985
35	Tehama (SV)	0.02270	0.02220	0.02172
36	Yolo (SV)	0.01855	0.01821	0.01789
37	Yuba (SV)	0.01856	0.01822	0.01789