

3.0 Response to Written Comments

Pechanga Comment Letter to the City of San Marcos
Re: Pechanga Tribe Comments on the Mulberry Drive Project
April 25, 2014
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resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

The Tribe is in receipt of the Project Draft Initial Study/Mitigated Negative Declaration. The proposed Project is located in a highly sensitive region of Luiseño territory – including association with a nearby Luiseño village, and a traditional cultural landscape. Because of the sensitivity and previously recorded resources within close proximity, the Tribe believes that the possibility for recovering subsurface resources during ground-disturbing activities is high. The Tribe has over thirty-five (35) years of experience in working with various types of construction projects throughout its territory. The combination of this knowledge and experience, along with the knowledge of the culturally-sensitive areas and oral tradition, is what the Tribe relies on to make fairly accurate predictions regarding the likelihood of subsurface resources in a particular location.

Based upon the information provided to the Tribe, there are no known cultural resources located within the Project boundaries. Therefore, the sensitivity of this Project lies with the potential to impact subsurface, unknown cultural resources during earthmoving activities. At this time, the Tribe thanks the City of San Marcos for conducting SB18 consultation and working to develop appropriate and adequate mitigation measures for the Project. These are identified in the IS/MND as MM-CR-1 through MM-CR-8 and have been copied below for reference. We request that these measures/conditions of approval and our recommended revisions be incorporated into the final IS/MND and any other final environmental documents approved by the City.

MM-CR-1 An archeological monitor and a Luiseño Native American monitor shall be present during all earth moving and grading activities to assure that any potential cultural resources, including tribal, found during project grading be protected.

MM CR-2 Prior to beginning project construction, the Project Applicant shall retain a San Diego County qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to cultural resources evaluation, which shall include archaeological documentation, analysis and report generation and take into account tribal customs and traditions.

4-3
Cont.

4-4

4-5

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

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MM-CR-3 At least 30 days prior to beginning project construction, the Project Applicant/Landowner shall enter into a Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a Luiseño Tribe. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on site.

4-6

MM-CR-4 Prior to beginning project construction, the Project Archaeologist shall file a pregrading report with the City to document the proposed methodology for grading activity observation, which will be determined in consultation with the contracted Luiseño Tribe referenced in MM-CR-3. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in MM-CR-3, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation the Luiseño Native American monitor in order to evaluate the significance of any archaeological resources discovered on the property. Tribal and archaeological monitors shall be allowed to monitor all grading, excavation, and groundbreaking activities, and shall also have the authority to stop and redirect grading activities.

4-7

MM-CR-5 The landowner shall relinquish ownership of all cultural resources collected during the grading monitoring program and, if appropriate, from any previous archaeological studies or excavations on the project site, to the appropriate Tribe for proper treatment and disposition per the Cultural Resources Treatment and Monitoring Agreement referenced in MM-CR-3. Such treatment may include curation at a facility that meets the criteria contained in 36 C.F.R. Part 79, including those facilities operated and maintained by a Luiseño Tribe or if requested by the appropriate Tribe, reburial on-site. All cultural materials that are deemed by the Tribe to be associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

4-8

~~In the event that curation of cultural resources is required, curation shall be conducted by an approved facility and the curation shall be guided by California State Historic Resource Commissions Guidelines for the Curation of Archaeological Collections. The City of San Marcos shall provide the developer final curation language and guidance on the project grading plans~~

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~~prior to issuance of the grading permit, if applicable, during project construction.~~

4-8
Cont.

MM-CR-6 All sacred sites, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation, if feasible.

4-9

MM-CR-7 If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. Suspected Native American remains shall be examined in the field and kept in a secure location at the site the location of the find shall be kept secure. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. The NAHC must then immediately notify the "most likely descendant(s)" of the discovery. The most likely descendants(s) shall then make recommendations within 48 hours, and engage in consultation concerning treatment of remains as provided in Public Resources Code 5097.98.

4-10

MM-CR-8 If inadvertent discoveries of subsurface archaeological/cultural resources, not including human remains or associated burial goods which is addressed in MM-CR-7, are discovered during grading, the Developer, the project archaeologist, and the Luiseño Tribe under agreement with the landowner described in MM-CR-3 shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. Pursuant to California Public Resources Code Section 21083.2(b) avoidance is the preferred method of preservation for archaeological resources. If the Developer, the project archaeologist and the Tribe cannot agree on the significance of mitigation for such resources, these issues will be presented to the Planning Director for decision. The Planning Director shall make a determination based upon the provisions of the California Environmental Quality Act with respect to archaeological resources and shall take into account the religious beliefs, customs, and practices of the Tribe. Notwithstanding any other rights available under law, the decision of the Planning Director shall be appealable to the Planning Commission and/or City Council.

4-11

The Pechanga Tribe looks forward to continuing to work together with the City of San Marcos in protecting the invaluable Luiseño cultural resources found in the Project area. Please

4-12

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contact me at 951-770-8104 or at ahoover@pechanga-nsn.gov once you have had a chance to review these comments if you have any comments or concerns. Thank you.

4-12
Cont.

Sincerely,



Anna Hoover
Cultural Analyst

Cc Pechanga Office of the General Counsel
Susan Vandrew Rodriguez, City Tribal Liaison

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3.0 Response to Written Comments

Letter 4

Pechanga Cultural Resources

- 4-1 This comment provides opening remarks and notes the Tribe's appreciation for the role the City is taking in maintaining the significant history of the Tribe in California. This comment does not raise any specific environmental issues so no additional response is warranted.
- 4-2 This comment provides background to establish the Pechanga's cultural affiliation with the project area. This comment does not raise any specific environmental issues so no additional response is warranted.
- 4-3 This comment states that the Tribe is not opposed to the project but notes that there is a potential for subsurface resources on the project site. The Draft Initial Study/Mitigated Negative Declaration (IS/MND) notes the potential for subsurface resources (Impact CR-1) and included mitigation measures to reduce the impact to below a level of significance. The Tribe has requested minor revisions to the proposed mitigation measures, as described in the subsequent comments.
- 4-4 This comment refers to mitigation measures MM-CR-1. No changes are requested for this mitigation measure from the Pechanga.
- 4-5 This comment refers to mitigation measure MM-CR-2. The requested changes have been incorporated into MM-CR-2.
- 4-6 This comment refers to mitigation measure MM-CR-3. The requested changes have been incorporated into MM-CR-3.
- 4-7 This comment refers to mitigation measures MM-CR-4. No changes are requested for this mitigation measure from the Pechanga.
- 4-8 This comment refers to mitigation measure MM-CR-5. The requested changes have been incorporated into MM-CR-5.
- 4-9 This comment refers to mitigation measures MM-CR-6. No changes are requested for this mitigation measure from the Pechanga.
- 4-10 This comment refers to mitigation measure MM-CR-7. The requested changes have been incorporated into MM-CR-7.
- 4-11 This comment refers to mitigation measure MM-CR-8. The requested changes have been incorporated into MM-CR-8.
- 4-12 This comment provides closing remarks and does not raise any specific environmental issues.

3.0 Response to Written Comments

From: carlc92069 [mailto:carlc92069@aol.com]

Sent: Wednesday, April 30, 2014 3:21 PM

To: Planning Commission

Subject: Mulberry drive Condo's

As a property owner and resident I wish to place my opposition to the proposal for the condo's	}	5-1
behind the 7-11 on Mulberry drive. This is way too many units on a small parcel with only one		5-2
entrance/exit. Auto Traffic on Mulberry is already high...we don't need to make it worse.		5-3

Carl Clark

921 Mulberry drive

San Marcos ca

3.0 Response to Written Comments

Letter 5

Carl Clark

- 5-1 This comment provides opening remarks and notes the commenter's opposition to the project.
- 5-2 This comment discusses the proposed density and ingress/egress for the project site. The project site is designated MDR2 (Medium Density Residential 2) in the General Plan. The MDR2 designation allows for residential development with 15 to 20 dwelling units/acre (du/acre). Under the current designation, up to 200 residential units could be developed on the project site. The project proposes 126 residential units on approximately 10 acres yielding a density of 12.6 du/acre. Thus the project represents a lower density project that is currently allowed under the site's General Plan and zoning designations.

With regard the single project driveway, one primary ingress/egress point is adequate for the project. A secondary emergency access will be provided for the project but would be restricted to use for emergency situations.

- 5-3 This comment addresses traffic volumes on Mulberry Drive. A traffic impact report was prepared for the project and summarized in the Draft Initial Study/Mitigated Negative Declaration (IS/MND). The complete traffic report was included as Appendix I of the document. The traffic analysis included an assessment of Mulberry Drive.

As shown in Table 22 of the Draft IS/MND, under the existing plus project condition, Mulberry Drive from Rose Ranch to Borden Road will operate at level of service A (LOS A) both with and without the project. The segment of Mulberry Drive from Borden Road to Mission Road will go from LOS A to LOS B with the addition of traffic. This is a less than significant impact.

As shown in Table 24 of the Draft IS/MND, in the existing plus cumulative condition, Mulberry Drive from Rose Ranch to Borden Road will operate at LOS A both with and without the project. The segment of Mulberry Drive from Borden Road to Mission Road will operate at LOS B both with and without the project. This is a less than significant impact.

Finally, in the forecast year 2035, Mulberry Drive from Rose Ranch to Borden Road will operate at LOS A both with and without the project. The segment of Mulberry Drive from Borden Road to Mission Road will operate at LOS B both with and without the project. This is a less than significant impact.

In conclusion, the project does not result in any significant impacts to Mulberry Drive.

3.0 Response to Written Comments

April 21, 2014

To: Garth Koller (Planner) and the Planning Commission (City of San Marcos) c/o Lisa Kiss
From: Jerry Griswold, 1068 Fulton Rd San Marcos 92069 *JB*
Re: Public Response to "Notice of Intent To Adopt Negative Declaration." Case No.: P13-0055;
(Mulberry Residential Project).

Summary: *Rather than adopt the Negative Declaration, it is recommended that the Planning Commission return the proposal to Staff with instructions to have the contractor redraft and recalculate the Traffic Impact Report:*

- a) using SANDAG standards for "peak hours" to capture data from Mission Hills High School*
- b) and considering and discussing the impact of Hollandia Dairy traffic on the project*

6-1

1. Background.

The following remarks are limited to traffic issues surrounding the proposed project and addressed in the Environmental Review. They arise from my reading of two documents prepared by RBF Consulting: "Mulberry Residential Project Traffic Impact Analysis Report" and "Mulberry Traffic Appendixes." Because I am an ordinary person and not an engineer, I have had help understanding these technical documents from Isaac Etchamendy and Garth Koller (from the City's Planning Office) and from Mike Calandra (Senior Transportation Analyst at SANDAG). I wish to gratefully acknowledge their help. That said, if there are any errors in the following, they are entirely my own and these folks are not to blame.

6-2

2. Mission Hills High School and problems with "peak hours" calculations

Throughout RBF Consulting's "Mulberry Residential Project Traffic Impact Analysis Report" and its Appendices, "*a.m. peak hours*" are defined as 7:00-9:00 a.m. and "*p.m. peak hours*" are defined as 4:00-6:00 p.m. While documentation of 24-hour periods exist, these particular definitions of peak hours play a critical role throughout the Report and its Appendices because they provide the basis for discussions of impacts, delineate windows of attention, and are used in calculations of future scenarios.

But there are problems with these narrow definitions. By restricting the p.m. peak period to the hours 4:00-6:00, the Report fails to take into consideration nearby Mission Hills High School where the school day ends at 2:54 p.m. A sizeable educational institution, Mission Hills has more than 2500 students and employs several hundred teachers and staff. Anyone who has been in the area when school lets out knows that the roadways are then flooded with vehicles, some driven by students and staff and others by parents (since San Marcos has largely done away with school busing). At the same time, sidewalks are thronged with pedestrians; indeed, shortly after 3:00 p.m., crosswalks at the intersection of Mission and Mulberry are the busiest in the city when dozens and dozens of students cross legally and illegally and vehicle traffic is delayed accordingly. But this time period, it should be noted, falls entirely outside the Report's chosen p.m. peak hours of 4:00-6:00.

6-3

In fact, the choice of these "peak hours" may be idiosyncratic. Mike Calandra is a Senior Research Analyst and SANDAG's specialist in traffic issues; about his responsibilities, he writes, "I actually run the regional travel demand model for SANDAG, as well as the public and private sectors." Calandra notes that SANDAG's standard definition of peak hours are 6am-9am and 3pm-6pm; these are widely known and widely used, and they appear in documents distributed by SANDAG as models for planners in various communities. Calandra is puzzled, consequently, by the truncated definition of peak hours used in the Traffic Report for the Mulberry Project: "I am not sure how or why the EIR you note below refers to two-hour peak periods. This could be City of San Marcos policy, how the traffic consultant does the analysis, or an oversight..?" (See his letter in my Appendix)

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That raises a question: Does the use of a shortened two-hour definition of “peak hours” in the Mulberry Traffic Report—as opposed to the more conventional three-hour definition used by SANDAG—really make any difference? To answer that, consider the following table for the roadway segment of Mulberry between Borden and Mission—in other words, the street right in front of the project and the site of the project’s driveway (see the Report’s original data sheet in my Appendix):

PM Period	TOTAL Vehicle Traffic
12:00/12:00-1:00 pm	509
13:00/1:00-2:00 pm	419
14:00/ 2:00-3:00 pm	577
15:00/3:00-4:00 pm	872
16:00/4:00-5:00 pm	778
17:00/5:00-6:00 pm	961
18:00/6:00-7:00 pm	616
19:00/7:00-8:00 pm	389
20:00/8:00-9:00 pm	306
21:00/9:00-10:00 pm	197

6-3
Cont.

Now consider: If you chose the two “peak” hours, when would they be? In this case, rather than using the Report’s idiosyncratic definition of 4:00-6:00, wouldn’t the more accepted SANDAG definition of 3:00-6:00 yield a more accurate picture of the peak hours when measuring traffic impacts?

Another example. One part of the Report evaluates seventeen intersections close to the project, including a very common route home at the end of the school day: from the high school, then south on Woodland Parkway, jogging right on Rancheros and then on to westbound SR-78. If you look at information buried in the Report’s appendices, you can ferret out the fact that the hour of heaviest traffic flow on these roadways is (not surprisingly) 3:00-4:00 p.m. The Report itself, however, seems determined to overlook this in its arbitrary fixation on the hours of 4:00-6:00 p.m. as its “peak hours.” Again, wouldn’t the more conventional (SANDAG) definition of peak hours (3:00- 6:00 p.m.) capture a more accurate views of the traffic situation if the concern is traffic impacts?

6-4

These are just two examples of traffic information not captured by the Reports’s idiosyncratic definition of peak hours. But this also has wider implications in dozens of other pages in the Report since this incomplete data about the present provides the basis for projections about future scenarios.

Conclusion: The Traffic Impact Report should be recalculated and redrafted using SANDAG’s conventional definition of peak hours.

3. No consideration is given to Hollandia Dairy’s industrial traffic

It is surprising that the Report makes no direct mention of Hollandia Dairy traffic on Mulberry. Quite near the project’s single driveway—in fact, just 70 yards to the south and across the street—is the industrial or trucking entrance to Hollandia Dairy. Though nicely hidden by tall shrubbery, the Dairy, it should be said, is not some country barn but a sizeable industrial site. With a footprint double that of the

6-5

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Mulberry project, the Dairy includes a 30,400 sq. ft. creamery, a 13,500 sq. ft. wastewater facility, as well as outbuildings, offices and storage facilities exceeding 56,000 sq ft. Hollandia is one of the top employers in San Marcos with 222 employees, less than Costco (251) but more than Home Depot (200).

While employees generally enter the site from off of Mission, it is the Mulberry entrance where the main business of this firm is transacted. Eighteen-wheel vehicles (long-haul trucks and trailers) routinely enter and exit this gate to deliver, as they proudly boast on their website, “fresh milk and by-products to all of San Diego County, Orange County, and portions of Los Angeles, Riverside and San Bernardino Counties.” A recent Google Earth photo (see my Appendix) shows more than seventy trucks or trailers on the property and clustered near the gate on Mulberry.

Since Hollandia’s Mulberry Gate is less than a stone’s throw from the entrance to this project and its 126 households, direct consideration ought to be given to the Dairy in the Traffic Report. Even if the ultimate conclusion is that its impact is insignificant, this issue merits mention. And since the Report also addresses traffic impacts during the project’s construction period, attention ought to be paid as well to how the Dairy’s eighteen-wheelers will need to compete with what the Report estimates to be 260 truck trips a day (28 an hour) traveling to and from the construction site.

Conclusion: The Traffic Impact Report should be rewritten to take into consideration Hollandia Dairy’s industrial traffic on Mulberry.

6-5
Cont.

4. Would an Amended Traffic Report make any difference in final determination of this project?

A corrected Traffic Report might or might not result in the same Mitigated Negative Declaration. But that is not the point. The purpose of the Traffic Report--along with the other sixteen parts of the environmental review--is to provide the public, the Planning Commission, and the City Council with an accurate and complete understanding of the proposed project. In its present form, it does neither. Because of its unconventional and truncated definition of “peak hours,” calculations are skewed. Because of missing data with regards to Hollandia Dairy, an incomplete picture is given.

6-6

5. Is this unfair to the developer?

It must be remembered that, in situations like these, approval is not the “default condition” so that apologies are required for any slowing of that inevitable result. Instead, it is the developer who wishes to change the status quo--asking for zoning changes and plan approvals--and this gives the City and its citizens a timely occasion to consider how the project is not only good for the developer, but good for the City, and finally good for both. To reach that determination, the public and the City, the Planning Commission and the City Council, need a correct and complete vision of the project. In fact, an accurate understanding of the project might result in suggestions about better ways to do things that everybody involved would find preferable. The problem is not with development but with the Report.

6-7

6. Isn’t this all untimely and unexpected? A monkey wrench thrown in at the last minute?

On the contrary. These issues--the High School, Hollandia Dairy--are obvious to anyone who lives in the neighborhood or is familiar with it. Moreover, I discussed these issues with City staff in early February and in letter sent on February 21 where I stressed the need for the Report to especially address: a) traffic impacts arising from the high school during typical school hours and b) traffic generated by the Hollandia Dairy (see my Appendix). Since these obvious and critical issues are not addressed in the current Traffic Report, it would be best to pause and get things right.

6-8

{An appendix of six pages follows}

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4/20/2014

Print

Subject: Fwd: question about "peak hours"
From: Jerry Griswold (jgriswol@mail.sdsu.edu)
To: jerrygriswold@yahoo.com;
Date: Sunday, April 20, 2014 10:57 PM

----- Forwarded message -----

From: "Calandra, Mike" <Mike.Calandra@sandag.org>
Date: Thu, 10 Apr 2014 20:55:25 +0000
Subject: RE: question about "peak hours"
To: Jerry Griswold <jgriswol@mail.sdsu.edu>

Hi Jerry,

I actually run the regional travel demand model for SANDAG, as well as the public and private sectors. Thus I can answer technical questions but maybe not all of the policy questions.

SANDAG's current travel demand model assigns trips to the network in 3 time periods:

- AM Peak Period 6 am – 9 am
- PM Peak Period 3 pm – 6 pm
- Off Peak The remaining 18 hours
in the day

The travel demand model is completely documented, and you will find these hours listed near the top of page 40 here:

http://www.sandag.org/uploads/publicationid/publicationid_1624_13779.pdf

Although ½ hour different than published in the Not So Brief Guide, that is SANDAG's peak period policy from a travel model standpoint. Two data sources were used to derive these peak period volumes – Travel Behavior Surveys and Caltrans freeway loop detectors.

We use these factors to convert "Peak Period" volumes to "Peak Hour:"

- AM 0.38

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APPENDIX 1066

6-9

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4/20/2014

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OM 0.34

I am not sure how or why the EIR you note below refers to two-hour peak periods. This could be City of San Marcos policy, how the traffic consultant does the analysis, or an oversight..??

Hope this helps and best of luck...

* Mike Calandra
* Senior Research Analyst
* San Diego Association of Governments
* 401 B St Suite 800
* San Diego, CA 92101
* (619) 699-6929 - phone, (619) 699-1905 - fax
* mca@sandag.org<<mailto:mca@sandag.org>>
* www.sandag.org<<http://www.sandag.org>>

From: Jerry Griswold [<mailto:jgriswol@mail.sdsu.edu>]
Sent: Thursday, April 10, 2014 10:19 AM
To: Calandra, Mike
Subject: question about "peak hours"

Mike Calandra--

I am hoping you can help an ordinary citizen.

I am looking at a Mitigated Negative Declaration for a condo proposal in San Marcos (still in draft form). I am particularly concerned about traffic impacts, especially because the proposed condo project is quite near Mission Hills High School. In the traffic section of the draft report, the City and its contractor look at nearby intersections in terms of peak hours defined as "a/m" (7:00-9:00 a.m.) and "p/m" (4:00-6:00 pm). The important point is that it ends at 2:54 p.m. As everyone can tell you, that's when roadways and sidewalks and crosswalks are flooded by more than 2500 students as well as school staff (San Marcos has largely done away with school busing). Because the San Marcos report used conventional business commuter times (4:00-6:00 pm) for their "peak hours," I am worried they did not take into consideration the school's hours and capture traffic impacts at the actual peak hours.

6-9
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When I look at this particular Mitigated Negative Declaration, it seems to me that the San Marcos document often references SANDAG when identifying the procedures or research protocols they employed. With that in mind, I wonder whether you can point me to SANDAG policies or customs that indicate that the definition of "peak hours" should be sensitive to local circumstances or be wider than those employed by San Marcos? My idea is that I could forward this logic to the folks in San Marcos while the Mitigated Negative Declaration is still in draft form before the April 28 close of the comment period.

In that regard, I note in SANDAG's "(NOT SO) BRIEF GUIDE OF VEHICULAR TRAFFIC GENERATION RATES FOR THE SAN DIEGO REGION" uses as the "p.m." peak 3:00-6:30 p.m. Elsewhere on the internet, I believe in instructions to Solana Beach planners, mention is made of the need to take into consideration the peculiarities of certain locales in deciding what to use as a "peak" instead of fixating on conventional commuting hours.

I'd be grateful for any help or instruction you might give me.

--

Jerry Griswold 760-744-2625

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Jerry Griswold
amazon.com/author/jerrygriswold
website: <http://www-rohan.sdsu.edu/~jgriswol/>
Twitter: @Jerry_Griswold <https://twitter.com/Jerry_Griswold>

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