

DEPARTMENT OF TRANSPORTATION

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June 16, 2008

Scott Vubeff
 City of Encinitas
 Planning Department
 505 S. Vulcan Ave.
 Encinitas, CA 92024

11-SD-5
 PM R39.83
 Hall Property Community Park
 Draft EIR

Dear Mr. Vubeff:

The California Department of Transportation (Caltrans) appreciated the opportunity to have participated in the review of the Draft Environmental Impact Report (DEIR) for the proposed Hall Property Community Park to be located adjacent to Interstate 5 (I-5) in Encinitas. We have the following comments:

- Project should coordinate with Caltrans I-5 North Coast Corridor Project engineers to ensure adequate right-of-way. According to Caltrans staff, right of way will be required for future freeway construction. Please see letter dated March 12, 2007. Please contact Project Engineer Fariborz Amiri at Caltrans District 11 Design Division for further coordination, (619) 688-6963 or Caltrans Right of Way at (619) 688-6900. S1-1
- Caltrans plans to construct a bio-swale along the westerly edge of the freeway adjacent to the Hall Property during the I-5 North Coast Widening Project. The City had indicated that in lieu of the City treating the water, the storm water could be treated within the Park Project storm water treatment center. If that is the case, then Caltrans would not need additional right of way to construct the bio-swale for the I-5 North Coast Widening Project. S1-2
- McKinnon Ave. overcrossing is currently shown to be rebuilt in the I-5 North Coast project plans. Per the city's request we are planning to "T" McKinnon Ave. in the location proposed by the City and previously discussed. An approved environmental document will be required for the McKinnon Ave. relocation. Also, if anything has changed since prior conversations between the City and Caltrans, please let Caltrans know as soon as possible. S1-3
- Exhibit Fig. 7-1, does not match text on page 3.2-7, sec. 3.2.3 S1-4
- Noise mitigation for this project should be based on the ultimate I-5 North Coast Widening Project. S1-5
- All lighting (including reflected sunlight) within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on I-5. S1-6
- Any work performed within Caltrans Right of Way (R/W) will require an encroachment permit. Early coordination with Caltrans is strongly advised for all encroachment permits. Current policy S1-7

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SUPPLEMENTAL INFORMATION RESPONSE TO COMMENTS HALL PROPERTY COMMUNITY PARK

S1-1

This comment introduces the letter from the Department of Transportation. No comments on the analysis of the EIR or supplemental information are included in this comment; therefore no further response is necessary.

S1-2

The City will continue to coordinate with Caltrans regarding the proposed project and the 1-5 North Coast Corridor Project regarding right-of-way.

S1-3

Although preliminary storm water treatment plans for the I-5 widening project have not been completed, the City will continue to coordinate with Caltrans regarding any potential treatment of stormwater runoff from the Caltrans right-of-way by the park project.

S1-4

The City will continue to coordinate with Caltrans regarding the realignment of the Mackinnon Avenue overcrossing.

S1-5

The alignment depicted in Figure 7-1 shows the project alternative of through access on Mackinnon Avenue. The discussion in Section 3.2.3 is referring the project as proposed with a no through traffic allowed on Mackinnon Avenue. Figure 2-4 depicts the proposed project as discussed in Section 3.2.3.

S1-6

The cumulative analysis of noise, Section 5.4.4 of the EIR, includes the I-5 North Coast Corridor project.

S1-7

The adjacency of the proposed park to Interstate 5 was considered in the design of the athletic field lighting to ensure that no unsafe conditions would be created for motorists. The lights would include shields to direct light to the ground and prevent light spill and direct views into the luminaries. As described in the analysis of park lighting in Section 3.5.3, the lighting along the eastern boundary of the project would be directed towards the main property to minimizing viewing angle sightlines from the adjacent freeway.

S1-8

This comment addresses Caltrans right-of-way and encroachment procedures. These comments do not specifically address the sufficiency or adequacy of the EIR or supplemental information packet in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

allows Highway Improvement Projects costing \$1 million or less to follow the Caltrans Encroachment Permit process. Highway Improvement Projects costing greater than \$1 million but less than \$3 million would be allowed to follow a streamlined process similar to the Caltrans Encroachment Permit process. In order to determine the appropriate permit processing of projects funded by others, it is recommended the concept and project approval for work done on the State Highway System be evaluated through the completion of a Permit Engineering Evaluation Report (PEER). A PEER should always be prepared when new operating improvements are constructed by the permittee that become part of the State Highway System. These include but are not limited to, signalization, channelization, turn pockets, widening, realignment, public road connections, and bike paths and lanes. After approval of the PEER an encroachment permit would be issued.

In order to expedite the process for projects sponsored by a local agency or private developer, it is recommended a PEER be prepared and included in the Lead Agency's CEQA document. This will help expedite the Caltrans Encroachment Permit Review process. The PEER document forms and procedures can be found in the Caltrans Project Development Procedures Manual (PDPM). <http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm>
[http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_\(TR-0112\).pdf](http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_(TR-0112).pdf)

S1-8
cont.

Furthermore, the applicant's environmental document must include such work in their project description and indicate that an encroachment permit will be needed. As part of the encroachment permit process, the developer must provide appropriate environmental approval for potential environmental impacts to Caltrans R/W. Environmental documentation should include studies or letters from qualified specialists or personnel which address the potential, or lack of potential, for impacts to the following resources in state right-of-way:

- Biological resources
- Archaeological and historic resources
- Visual quality
- Hazardous waste
- Water quality & stormwater
- Pre-historic resources
- Air quality
- Noise levels

Copies of all project-related environmental documentation and studies which address the above-cited resources should be included with the project proponent's encroachment permit application to Caltrans for work within State R/W. If these materials are not included with the encroachment permit application, the applicant may be required to acquire and provide these to Caltrans before the permit can be processed, potentially resulting in significant delays in permit approval. The developer will also be responsible for procuring any necessary permits or approvals from the regulatory and resource agencies for the improvements.

Scott Vubeff
June 16, 2008
Page 3

When a property owner proposes to dedicate property to a local agency for Caltrans use in conjunction with a permit project, Caltrans will not issue the encroachment permit until the dedication is made and the property has been conveyed to the Department.

Improvement plans for construction within Caltrans R/W must include: typical cross sections, adequate structural sections, traffic handling plans, and signing and striping plans stamped by a professional engineer. All construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you require further information or have any question, please contact Seth Cutter at (619) 688-6075.

Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

S1-8
cont.



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

June 12, 2008

Mr. Scott Vurbef
Environmental Planner
Development Services
City of Encinitas
505 S. Vulcan Avenue,
Encinitas, California 92024

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
FOR THE HALL COMMUNITY PARK PROJECT, CASE NUMBER: 04-197
MUP/CDP/EIR, SANTA FE DRIVE/MACKINNON AVENUE, ENCINITAS
(SCH#2004121126)

Dear Mr. Vurbef:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Availability (NOA) for an Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed project is a public community park on 44 acres. The City has developed a preliminary design for the proposed community park that includes a mixture of active and passive uses. The proposed plan for the park includes three baseball/softball fields and five multi-use turf fields. Three of the five turf fields would be overlaid on the three baseball/softball fields. The proposed project also includes a skate park, teen center, dog park, amphitheater, trails, picnic areas, children's play areas, two half basketball courts, a potential municipal aquatics facility, and additional recreation facilities for varied experiences." DTSC has the following comments; please address if applicable.

- 1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances, and any known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the pertinent regulatory agencies:

S2-1

S2-2

S2-1

This comment introduces the letter from the Department of Toxic Substances Control and notes details of the project description. No comments on the analysis of the EIR or supplemental information are included in this comment; therefore no further response is necessary.

S2-2

The EIR identifies current and historic uses at and surrounding the project site as described in the comment. Pages 22-25 of the Phase I Environmental Site Assessment (Appendix H to the EIR) contain a list of regulatory databases reviewed along with conclusions as to the likelihood that they have resulted in a recognized environmental condition at the site. Pages 33-37 of the Phase I Environmental Site Assessment contain a list of historical resources reviewed along with descriptions and discussions of the historical site and site vicinity land uses and conclusions whether these land uses have resulted in recognized environmental conditions at the site.

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
 - Envirostor: A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
 - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No. 14 below for more information.
- 3) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.

S2-2
cont.

S2-3

S2-4

S2-3

A Phase I Environmental Site Assessment was completed for the site. The results of the Phase I Assessment indicated that recognized environmental conditions may be present at the site in connection with the historical site land use for agricultural purposes. Based on these findings, a Voluntary Assistance Program (VAP) application was filed with the County of San Diego Department of Environmental Health (DEH) in accordance with California Health and Safety Code Section 101480-101490. The VAP is designed to provide the applicant with DEH consultation, project review, and public health assessment pertaining to properties suspected to be contaminated with hazardous substances. After consultation with the DTSC and Regional Water Quality Control Board (RWQCB), the DEH was designated as the oversight regulatory agency. Based on the results of the findings of the Phase I Assessment, a Workplan was prepared to assess potential recognized environmental conditions. The Workplan was reviewed and approved by the DEH. The Workplan was implemented and a report titled, *Subsurface Investigation and Limited Health Risk Assessment Report* was prepared. DEH has reviewed the findings of the assessment and has provided a letter of concurrence with the conclusions and recommendations of the report, which is included in Appendix H to the EIR.

It should be noted that the VAP application that was submitted to DEH is required to be forwarded to DTSC and RWQCB to determine if they would like to take regulatory oversight of the project. This process was followed and DTSC or the RWQCB did not take regulatory oversight of the project. The form returned by DTSC has been included at the end of Appendix H to the EIR.

S2-4

A workplan was prepared to assess the potential environmental concerns that were identified in the Phase I Environmental Site Assessment. The workplan was submitted to the County of San Diego Department of Environmental Health (DEH) and subsequently approved. The assessment detailing the implementation of the DEH-approved workplan was prepared in March 2006 for the proposed Hall Property Community Park project. The DEH has reviewed the findings of the assessment and has provided a letter of concurrence with the conclusions and recommendations of the report, which is included in Appendix H to the EIR. Section 3.6.1 provides additional details regarding this process. All sampling results are provided in the hazardous materials reports included in Appendix H of the EIR and summarized in Section 3.6 of the EIR.

- 4) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR. S2-5
- 5) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property. S2-6
- 6) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies. S2-7
- 7) Project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination. S2-8
- 8) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment. S2-9
- 9) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United S2-10

S2-5

All investigation and sampling work has been overseen by DEH and any future measures would be conducted with their oversight. Appendix H of the EIR contains relevant documentation from the oversight agency.

S2-6

As part of the Phase I Environmental Site Assessment completed for the site, a regulatory database was reviewed and regulatory agency files reviewed to assess the potential for the Site to be impacted from off-site sources as described in response to comment S2-2. The assessment found that with the possible exception of the dry cleaners located adjacent to the site and the reported and known releases of hazardous materials/wastes or petroleum products at the Scripps Memorial Hospital located approximately 700 feet northwest of the site and a Shell Service Station located approximately 800 feet northeast of the site, there were no obvious indications that a recognized environmental condition exists at the site as a result of known and reported releases of hazardous materials/wastes or petroleum products from an off-site source. There is a low likelihood that a recognized environmental condition exists at the site as a result of these reported releases.

S2-7

It has been determined that asbestos containing materials (ACM) and other hazardous building materials (e.g., lead-based paint) could be present in or on the wooden structures that remain onsite. Inhalation or ingestion of these materials could pose a danger to workers and the surrounding community. For these reasons, the EIR concluded that demolition of these buildings could cause significant health hazards (Impact Hazardous Materials-2) and provides mitigation to reduce the potential for exposure (Mitigation Measure Hazardous Materials-2).

S2-8

Subsurface assessment activities (including soil sampling) have been completed at the site with regulatory oversight from the DEH. Constituents of concern (CoCs) have been identified in the shallow soil at the site. Proposed redevelopment plans do not include soil export from the site; therefore, hazardous waste will not be generated. Soil impacted with CoCs will remain on-site; therefore, a Soil Management Plan and a Community Health and Safety Plan will be prepared and approved by the DEH. Based on the soil sample analysis and comparison with the calculated Risk Screening Levels for adult and child park users, it is appropriate to leave the impacted soils onsite with implementation of the Soils Management Plan. If there is a need for soil import during proposed redevelopment activities, the soil will be sampled for CoCs prior to acceptance at the site.

S2-9

It was determined that construction of the Hall Property Community Park could result in temporary exposure to residual contaminants (pesticides, petroleum hydrocarbons, VOCs) present in shallow soils via inhalation (of fugitive dust), ingestion, or dermal exposure (Impact Hazardous Materials-1). Mitigation is proposed that would be required prior to initiating demolition, grading, and construction operations, the preparation of a Soil Management Plan, Worker Health and Safety Plan, and a Community Health and Safety Plan by a qualified environmental professional. These documents will be reviewed and approved by the DEH (Mitigation Measure Hazardous Materials-1).

S2-10

Operation of the proposed park is not anticipated to generate hazardous waste.

- States Environmental Protection Agency Identification Number by contacting (800) 618-6942. S2-10 cont.
- 10) Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. S2-11
- 11) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB). S2-12
- 12) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. S2-13
- 13) Your document states: "The project site is generally undeveloped. There are remnants of old structures related to the previous agricultural use of the site remaining on the property. In addition, there are five residential structures located on the project site, two of which are occupied with tenants. The Hall property underwent cleanup activities in 2003 to remove the debris field left from previous greenhouse activities (a full description of clean up provided in this EIR). These cleanup activities became a controversial issue and the City was sued for lack of full environmental review. The Hall property was previously used for agricultural flower cultivation operations." If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. S2-14
- 14) EnviroStor is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489. S2-15

S2-11

The project is not anticipated to use or store materials requiring authorization from CUPA.

S2-12

The project does not propose to discharge wastewater into a storm drain. Water quality and hydrology information is included in Section 3.7 of the EIR.

S2-13

The required preparation of a worker health and safety plan and a community health and safety plan shall include details regarding the stop of work and safety procedures to be implemented (Mitigation Measure Hazardous Materials-1).

S2-14

The Subsurface Investigation and Limited Health Risk Assessment Report (included in Appendix H to the EIR) analysis of onsite soil samples, conducted under the oversight of DEH indicates the presence of COCs. However, these COCs at the site appear to be limited to shallow soils, and there is a low likelihood that they have migrated to the groundwater beneath the site.

S2-15

The information regarding EnviroStor and cleanup oversight is noted. Please see response to comment S2-1 regarding project oversight.

Mr. Scott Vurbeff
June 12, 2008
Page 5 of 5

- 15) In future CEQA documents please provide the contact person's email address.
Also, if the project title changes, please provide historical project title(s).

S2-16

If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, at thom@dtsc.ca.gov or by phone at (714) 484-5477.

Sincerely,



Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
1001 I Street, 22nd Floor, M.S. 22-2
Sacramento, California 95814
gmoskat@dtsc.ca.gov

CEQA#2165

S2-16

The City of Encinitas contact for the Hall Property Community Park Project is
svurbeff@ci.encinitas.ca.us.

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 657-5390
 Web Site www.nahc.ca.gov
 e-mail: ds_nahc@pacbell.net



May 19, 2008

Mr. Scott Vurbeff, City Planner

CITY OF ENCINITAS

505 S. Vulcan Avenue
 Encinitas, CA 92024

Re: SCH#2004121126: CEQA Notice of Completion: draft Environmental Impact Report (DEIR) for the Hall Property Community Park Project, City of Encinitas, San Diego County, California

Dear Mr. Vurbeff:

The Native American Heritage Commission is the state agency designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c) (CEQA guidelines). Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- √ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ <http://www.ohp.parks.ca.gov>. The record search will determine:
 - If a part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- √ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ Contact the Native American Heritage Commission (NAHC) for:
 - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section.
 - The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - A culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

S3-1

S3-1

It is noted that this letter contains identical information as a letter previously received from the Native American Heritage Commission in response to the EIR that is included as comment letter A2.

Cultural resource impacts of the project are addressed in Section 3.10 of the EIR. A cultural resources assessment was prepared for the project (EIR Technical Appendices, Appendix N). The assessment conducted a record search, which identified no significant recorded resources on the project site. In addition, an archeologist's survey of the site did not identify the presence of any significant cultural resources. Nonetheless, Section 3.10.5 of the EIR provides mitigation measures that require construction monitoring to be conducted by a qualified archaeologist during ground-disturbing activities. If a potential cultural resource is encountered during these activities, work would be halted in the affected area and the resource would be assessed for significance. If a significant resource is identified, a data recovery plan would be implemented by the archaeologist.

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

√ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

S3-1
cont.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Native American Contacts
San Diego County
May 19, 2008

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center , CA 92082
(760) 749-3200
(760) 749-3876 Fax

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley , CA 91962
(619) 709-4207

Santa Ysabel Band of Diegueno Indians
Johnny Hernandez, Spokesman
PO Box 130 Diegueno
Santa Ysabel , CA 92070
brandietaylor@yahoo.com
(760) 765-0845
(760) 765-0320 Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
(619) 742-5587
(619) 443-0681 FAX

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O Box 270 Diegueno
Santa Ysabel , CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

San Luis Rey Band of Mission Indians
Russell Romo, Chairman
12064 Old Pomerado Road Luiseno
Poway , CA 92064
(858) 748-1586

Pauma & Yuima
Christobal C. Devers, Chairperson
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
paumareservation@aol.com
(760) 742-1289
(760) 742-3422 Fax

Pauma Valley Band of Luiseño Indians
Bennae Calac, Chair - Repatriation Committee
P.O. Box 369 Luiseno
Pauma Valley , CA 92061
bennaecalac@aol.com
(760) 617-2872
(760) 742-3422 - FAX

S3-1
cont.

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2004121126; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Hall Property Community Park; City of Encinitas; San Diego County, California.

Native American Contacts
San Diego County
May 19, 2008

San Luis Rey Band of Mission Indians
Carmen Mojado, Co-Chair
1889 Sunset Drive Luiseno
Vista, CA 92081
cjmojado@slrmissionindians.org
(760) 724-8505

San Luis Rey Band of Mission Indians
Mark Mojado, Cultural Resources
1889 Sunset Drive Luiseno
Vista, CA 92081 Cupeno
(760) 724-8505
(760) 586-4858 (cell)

Clint Linton
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
(760) 803-5694
cjlinton73@aol.com

S3-1
cont.

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2004121126; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Hall Property Community Park; City of Encinitas; San Diego County, California.



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

June 17, 2008

Scott Vurbef
City of Encinitas
505 S. Vulcan Avenue
Encinitas, CA 92024-3633

Subject: Hall Property Community Park
SCH#: 2004121126

Dear Scott Vurbef:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 16, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

S4-1

S4-1

This comment states that the State Clearinghouse distributed the EIR to selected agencies for review and includes comment letters received in response. The comment acknowledges compliance with CEQA regarding State Clearinghouse review requirements. No comments on the environmental analysis are included; therefore no further response is necessary.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2004121126
Project Title Hall Property Community Park
Lead Agency Encinitas, City of

Type EIR Draft EIR

Description The proposed project is a public community park on 44 acres.

Lead Agency Contact

Name Scott Vurbef
Agency City of Encinitas
Phone (760) 633-2692 **Fax**
Address 505 S. Vulcan Avenue
City Encinitas **State** CA **Zip** 92024-3633

Project Location

County San Diego
City Encinitas
Region
Lat / Long
Cross Streets Santa Fe Drive and MacKinnon Avenue
Parcel No.
Township

S4-1
cont.

Range	Section	Base
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Proximity to:

Highways I-5
Airports
Railways NCTD
Waterways Pacific Ocean
Schools
Land Use Vacant / R3 / Residential

Project Issues Air Quality; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Fish and Game, Region 5; Department of Water Resources; Department of Conservation; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Department of Toxic Substances Control; State Lands Commission

Date Received 05/02/2008 **Start of Review** 05/02/2008 **End of Review** 06/16/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

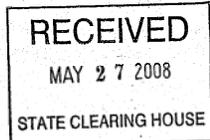
NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 658-6251
 Fax (916) 657-5390
 Web Site www.nahc.ca.gov
 e-mail: ds_nahc@pacbell.net



May 19, 2008

Mr. Scott Vurbuff, City Planner
CITY OF ENCINITAS
 505 S. Vulcan Avenue
 Encinitas, CA 92024



clear
 6-16-08
 e

Re: SCH#2004121126: CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Hall Property Community Park Project, City of Encinitas, San Diego County, California

Dear Mr. Vurbuff:

The Native American Heritage Commission is the state agency designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c) (CEQA guidelines). Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- √ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/853-7278)/ <http://www.ohp.parks.ca.gov>. The record search will determine:
 - If a part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- √ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ Contact the Native American Heritage Commission (NAHC) for:
 - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section.
 - The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - A culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

S4-2

This comment letter forwarded by the State Clearinghouse from the Native American Heritage Commission was also submitted directly to the City of Encinitas and is included in these responses to comments as comment letter S3. See response to comment #S3-1.

S4-2

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

- CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

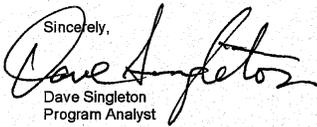
√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. .

Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony. .
√ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

S4-2
cont.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse



Technical Consultation, Data Analysis and
Litigation Support for the Environment

201 Wilshire Blvd., 2nd Floor
Santa Monica, CA 90401
Fax: (310) 393-3839

Matt Hagemann
Tel: (949) 887-9013
Email: mhagemann@swape.com

June 12, 2008

Mr. Juan Jimenez
Chief, Border Unit
Department of Toxics Substances Control
9174 Sky Park Court, Suite 150
San Diego, CA 92123-4340

Dear Mr. Jimenez:

In April 2007, Soil/Water/Air Protection Enterprise (SWAPE) reviewed a Draft Environmental Impact Report for the Hall Property at 425 Santa Fe Drive, Encinitas, California on behalf of Citizens for Quality of Life. Our review identified an issue that merits your immediate attention: the detection of chlorinated pesticides in soil at concentrations that exceed California hazardous waste criteria in locations less than 200 feet from nearby residences.

The Hall Property is to be developed for recreational uses including baseball and soccer fields, a skate park, dog park, teen center, aquatic facility, amphitheater, walking trails and picnic areas. The development will involve extensive grading which will put construction workers and nearby residents at potential risk through inhalation and dermal contact exposure pathways. The County of San Diego Department of Environmental Health is involved with in the oversight of the property but we believe the County is not adequately equipped to assess potential health impacts. We therefore ask DTSC to examine the data which we have summarized below and to assert regulatory authority to ensure that the site will be managed to minimize public health risks.

At the property, chlorinated pesticides, including toxaphene, 4,4-DDE and 4,4-DDT have been detected at concentrations that exceed criteria for hazardous waste in the State of California. A March 2, 2006 Subsurface Assessment Report¹ compared pesticides in soil to regulatory screening levels but did not compare the results to California Hazardous Waste Criteria (California Code of Regulations Title 22). In a comparison to the California Hazardous Waste Criteria conducted for this report, we have determined that

¹ Subsurface investigation and Limited Human Health Risk Assessment, March 2, 2006 (attached)

S5-1

This letter was provided as an attachment to the comment letter submitted by Gerald Sodomka. This letter is not addressed to the City of Encinitas regarding the environmental analysis contained within the EIR or the supplemental information. Rather, this letter is addressed to the Department of Toxics Substances Control (DTSC). The letter contains information regarding the proposed project and the hazardous materials testing that was completed on the project site. The letter requests that DTSC review the contamination data and direct appropriate action. It should be noted that DTSC submitted a letter regarding the project on June 12, 2008 and this letter is included as S2.

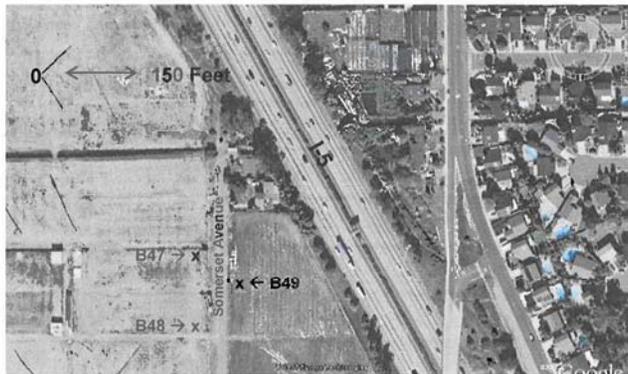
The commentor raises the issue of chemical concentrations that exceed the criteria for hazardous waste. See response to comment B3-3. California Hazardous Waste Criteria values are not health risk-based standards; rather, they are concentrations at which a constituent of concern (CoC) would be considered a hazardous waste if excavated and exported from a property. They apply only to contaminated media (i.e., soil or water) that are actually removed from the site as waste material. Hazardous waste criteria are inappropriate for use as remediation goals. As indicated in the Phase 1 Environmental Assessment (Appendix H to the EIR) prepared for the project, soil is not proposed to be exported from the site. Therefore, based on concentrations of CoCs at the site, SCS Engineers prepared a health risk assessments for the CoCs. As discussed in Appendix H, the findings indicate that concentrations of CoCs are below California Human Health Screening Levels, Preliminary Remediation Goals, or calculated risk screening levels for adult and child community park visitors.

S5-1

soil at the Hall property contains toxaphene, 4,4-DDE and 4,4-DDT at concentrations as follow (California Code of Regulations Title 22 Hazardous Waste Criteria dry weight equivalents are provided in parentheses for comparison):

- Sample B47-1: 4,4-DDE at 2,050 ug/kg (1,000 ug/kg)
- Sample B48-1: 4,4-DDE at 1,820 ug/kg (1,000 ug/kg)
- Sample B48-1: 4,4-DDT at 1,630 ug/kg (1,000 ug/kg)
- Sample B49-1: 4,4-DDT at 3,050 ug/kg (1,000 ug/kg)

All samples listed above were collected at a depth of one foot. Sample B-15 was collected in areas of former greenhouses. Samples B47, B48 B49 were collected in "chemical storage areas" (p. 7, March 2, 2006 Subsurface Assessment Report). As shown below, some of the samples, including B47, B48, and B49 are less than 100 feet from nearby residences. Some areas are fenced but gaps in the fencing were noted during a site visit in March 2007.



S5-1
cont.

We have documented other sites that required soil removal and disposal in a Class I landfill by DTSC where pesticide contamination exceeded hazardous waste levels, including:

- A site where toxaphene-contaminated soil was removed from a site in Solano County, California to achieve a cleanup goal of 360 ug/kg for unrestricted site use (http://www.dtsc.ca.gov/SiteCleanup/Projects/upload/Mangels_Ranch_FS_RAW.pdf).
- A school site in Newmark, California where contaminated soil was removed to achieve a cleanup goal of 440 ug/kg for toxaphene and 500 ug/kg for 4,4-DDE (http://www.dtsc.ca.gov/SiteCleanup/Projects/upload/Ohlone_FS_dRAW.pdf).

Again, we acknowledge that San Diego County Department of Environmental Health is overseeing the assessment of the Hall Property under a voluntary program; however, given the high levels of contaminants in the soil and the potential for human exposure, we believe it is appropriate to refer this case to DTSC, an agency with resources to adequately evaluate health risks.

Given the exceedences of the California Hazardous Waste Criteria, the shallow depth of the samples, and unrestricted access to contaminated soil, we believe your agency is best qualified to review the contaminant data and to direct the appropriate response action, including disposal in a Class I landfill.

Please call with any questions,

Matt Hagemann
(949) 887-9013

S5-1
cont.

Scott Vurbeff

From: Dewey Baker [Dewey-Baker@cox.net]
Sent: Monday, May 05, 2008 11:13 AM
To: Scott Vurbeff
Subject: Hall property

May 5, 2008
Hall Property

Re:

I live in Cardiff on Summit avenue and I am in support of the plan for the Hall property. I would like the city to consider dedicated soccer fields instead of multiuse fields. Also, I think it is important to design the ball fields and Soccer fields for adult teams as well as kids teams. Encinitas has many adults playing soccer and we are in need of additional fields to play on.

S6-1

Dewey Baker

S6-1

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

Scott VurbEFF

From: MJ Baker [mj-baker@cox.net]
Sent: Monday, May 05, 2008 3:47 PM
To: Scott VurbEFF
Subject: Hall Property

Regarding the Hall Property: 5/5/08

I live in Cardiff on Summit Ave. I fully support your plan for the Hall Property. Please consider more soccer fields in place of the multiuse fields. Also many adults would use these fields for recreation too, so please take that into consideration with your plan. There is a Huge shortage of field space for adults as well as kids. I know of many many many adults who play soccer for fun and exercise, and fields are desperately needed.

S7-1

Thank you,
Mary Baker

5/23/2008

S7-1

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR or supplemental information packet in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

Scott Vurbeff

From: Diane Bond [DianeBond@worldnet.att.net]
Sent: Friday, June 13, 2008 5:00 PM
To: council; Scott Vurbeff
Cc: Diane Bond; tayloren@cox.net
Subject: Hall Property EIR

Dear Council and Mr. Verbuff:

I am submitting my comments regarding the Hall EIR. Set forth below are my concerns regarding the traffic analysis. To add to the problem, Santa Fe has now been restriped on the south side to direct traffic onto the freeway, thus, this change in condition needs to be addressed. I have not heard back from anybody regarding my concerns set forth below. I did find out that the roundabout was considered and found to mitigate any problems with that intersection, however, I could not find any data substantiating this claim. Also, were the SANDAG ADT figures used at all and if not, why not. Further, the EIR is not clear as to what ADT figures were used as to the McKinnon bridge traffic that would be re-routed to other streets, and how the impact of future development of the hospital and other projects will not impact traffic.

S8-1
S8-2
S8-3
S8-4

My second concern is the air pollution and air quality. The EIR shows an increased risk for cancers but I did not see any analysis done as to increased risk for respiratory diseases such as asthma -- which is reaching epidemic proportions in children -- and this issue needs to be addressed.

S8-5

Also, the lighting proposed would ruin the night time sky. I enjoy watching the stars at night from my backyard, and in past years have seen a good show of the Perseids, but as the years have gone by the ambient lighting at night becomes so intense that sometimes it seems like a full moon is out. Living close to the ocean gives us a chance to have darker skies if lighting is kept within limits. The proposed lighting will be another blight in the neighborhood and interfere with the use and enjoyment of my property, and it will cost too much money to run. If people want to use the area, let them use it during daylight.

S8-6

The proposed sports complex must include a pool, it is a disgrace that an ocean community does not have a community pool where children can learn to swim. Nobody ever died because they did not know how to kick a soccer ball!

S8-7

Finally, the proposed complex is simply too large, too expensive and smells of pandering to special interest -- no subsidy of soccer with public money.

Scale back the park.

Thanks,
Diane Bond
----- Original Message -----

From: Scott Vurbeff
To: Nestor E. Mangohig
Cc: dianebond@att.net
Sent: Tuesday, June 03, 2008 9:58 PM
Subject: RE: Hall Property EIR

Diane: I'll need to defer your questions to the traffic engineer.
Nestor: When you have a chance, could you respond to Diane's emails? Thx, Scott

-----Original Message-----
From: dianebond@att.net [mailto:dianebond@att.net]

6/16/2008

S8-1

It is correct that minor roadway modifications have been made since preparation of the project Traffic Analysis, but these modifications, such as a re-striping of Santa Fe Drive, would not result in such substantial adjustments to the traffic conditions in the project area that the conclusions of the traffic study would change.

S8-2

The Traffic Analysis includes a Roundabout Analysis as Section 17.3. Table 17-16 in the traffic study shows the "with mitigation" Level of Service, assuming a roundabout is installed. This table shows LOS B or better operations.

S8-3

Page 77 of the traffic study discusses the fact that SANDAG ADTs were used in the 2030 analysis. Existing ADTs and SANDAG 2030 ADTs were used to determine the amount of MacKinnon Avenue traffic that would be shifted if a portion of this road is closed.

S8-4

Chapter 5 of the EIR addresses cumulative impacts of the project in combination with other projects in the area, including the Scripps Memorial Hospital expansion project. Future cumulative traffic conditions in both year 2010 and 2030 are analyzed and impacts discussed in Sections 3.2.3 and 5.4.2. Tables 3.2-7 through 3.2-10 and Table 5-2 provide details of the cumulative traffic analysis. Four intersections were identified as having significant, unmitigable traffic impacts in 2010.

S8-5

The comment requests additional analysis regarding increased risk of respiratory diseases in children due to air pollution. The City prepared and circulated for public review in May and June of 2008, a report titled Children's Health Risk Analysis that addressed the risk for respiratory diseases, such as asthma and reduced lung function. The information from this analysis was summarized into the EIR within Section 3.3, Air Quality, which was also recirculated for public review and comment.

S8-6

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR or supplemental information packet in identifying and analyzing the project's environmental impacts and are therefore noted for the record. Lighting impacts are discussed in Section 3.5.

S8-7

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR or supplemental information packet in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

Sent: Fri 5/30/2008 6:16 PM
To: Scott Vurbef, council; Diane Bond
Cc: tayloren@cox.net; Phil Cotton; Peter Cota-Robles; Nestor E. Mangohig
Subject: RE: Hall Property EIR

Dear Scott:

I have partially reviewed the Hall Property EIR regarding Traffic and Circulation and I have some questions. First, what I reviewed is on the City website as the Hall Property EIR, revised. Second, I assume that an EIR must analyze existing street conditions. Third, I assume that in analyzing the existing street conditions, the analysis must be done in accordance with a street's classification by the City.

S9-1

In the EIR, Santa Fe Dr. is classified as a two-lane local augmented roadway (part of the street is "constructed" as a four-lane collector but I assume that the City's classification is what governs). However, in the Existing Street Segment Operations at Table 3.2-3, the Existing Capacity, V/C and LOS are calculated on a collector roadway designation for three segments, one of which segments is from the roundabout to the Santa Fe Plaza Driveway which is only one lane in each direction (thus "constructed" as a two-lane local augmented roadway) for more than half the segment length. Given the use of erroneous existing capacity figures for an LOS E in this table, the EIR completely underestimates existing V/C and LOS, therefore, the conclusions drawn regarding existing and project impact are fatally flawed and absolutely unreliable. This mistake is also repeated for the Birmingham segments, again grossly underestimating the existing V/C and LOS, resulting in flawed and unreliable conclusions. Furthermore, the intersection of Devonshire/Rubenstein/Santa Fe was analyzed for existing conditions as a two way stop, which it isn't.

S9-2

S9-3

S9-4

Before I go through the whole plan and recalculate the actual impact of the project based upon the correct classifications and figures, please let me know if I am referencing the most updated Traffic and Circulation draft.

Thank you,

Diane E. Bond, Esq.
Bleiler & Bond APC
12555 High Bluff Drive, Suite 150
San Diego, CA 92130
858-350-9833
Tel: 858-350-9833
Fax: 858-350-9834

S9-1

The Traffic Analysis and EIR provide analysis of the streets, intersections, and traffic conditions that existed at the time of the reports were initiated. It is correct that minor roadway modifications have been made since that time, but these modifications would not result in such substantial adjustments to the traffic conditions in the project area that the conclusions of the traffic study would change.

S9-2

The segment of Santa Fe Drive between the Santa Fe Plaza driveway and Rubenstein Avenue is 4 lanes for a portion and 2 lanes for a portion. Four lanes are provided at the two most constrained intersections along the corridor (the Santa Fe Plaza driveway and the Alley intersection) and the high capacity roundabout at Rubenstein Avenue operates at a very good LOS A or LOS B depending on the time period. It was therefore decided to use the 4-lane capacity since it provided a more accurate estimate of overall operations. Using a 2-lane assumption would indicate LOS F conditions, which is not consistent with the free flowing nature of the roadway. The proper capacity of Santa Fe Drive was utilized in the traffic study.

S9-3

The proper 2 lane capacity of Birmingham Drive was utilized in the traffic study based on City standards.

S9-4

When the traffic analysis began, stop signs were present as the intersection control at the Rubenstein intersection. The mitigation measure of installing a roundabout was recommended (See Page 104 of the Traffic Analysis) and the roundabout has since been implemented.

CITY OF ENCINITAS
CITY CLERK

2008 JUN 16 PM 2: 28

June 12, 2008

TO: Scott Vurbef

RE: Recirculated Hall Property Draft EIR.

My main concern is protecting the children who will be playing on the fields of the proposed sports tournament park. Regardless the data shown on your study, we all know that the air within 500 feet of a heavily traveled freeway is extremely polluted. The air beyond those 500 feet does not suddenly become clean either.

S10-1

Studies show that children and adolescents are very susceptible to diseases from environmental causes, more so than adults, because they have not built up their tolerance for such an assault on their developing lungs and bodies. Statistics bear out that breathing disorders for children have steadily risen over the past few years. In addition, here is the City of Encinitas intent on placing our children in harms way for the sake of a tournament park the City wants. What about the health of our children? That should be the prime concern for all of us.

S10-2

It is misleading to say that the air currents will blow the pollutants away from the fields where children are involved in sports activities. Those children will be deeply breathing in those pollutants. Children participating in strenuous activity breathe through their mouths, unlike adults. Studies confirm that pollutants will not be filtered out as with nasal breathing. Pollutants will directly enter children's and adolescent's systems.

S10-3

In addition, the data gathered to help support the clean air portion of the Recirculated EIR is faulty. It was gathered from areas that do not have the same microclimate that we have in Cardiff. We have neither the same topography nor wind currents as the studies cited in your report. Therefore, one would conclude, the data presented is not applicable to our area.

The fact is, this is the wrong place for a tournament sports park. Surely, the City can find a healthier place for this proposed park than adjacent to the I-5 freeway. You will note that I did not address the toxic earth upon which this park, for children to play, is to be developed. You already know the dangers there.

S10-4

Going forward with the planned tournament sports park, while knowing the significant health risk factors for some of the most vulnerable people in our community, our children and adolescents, would be irresponsible.

Marie Dardarian

Marie Dardarian
Cardiff by the Sea

S10-1

In the Children's Health Risk Analysis, the discussion of air pollutant concentrations and health concerns within 500 feet of a freeway and beyond is based on available scientific studies and publications. The analysis took into consideration all of the available scientific information and the specific details of the project, including meteorology, distance from the pollution source, exposure time, etc. in order to determine a significance conclusion. The analysis found that based upon the available information regarding health and pollutant exposure and the details specific to the project site, the resulting impact would be less than significant to park users.

S10-2

The commentor states that children and adolescents are more susceptible to diseases from environmental causes than adults. It was for this reason that the health risk analysis was based on the exposure of children to freeway pollutants, rather than adult park users.

S10-3

A detailed response to wind direction data and applicability to the project site is provided in response to comment S15-3.

S10-4

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR or supplemental information packet in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

Scott,

Please accept the comments below in response to the subject review period.

Noise Section, dog park.

1. The measurements taken on Bach street were in front of a single family home with trees in the backyard. The length measured was 150 feet and the average noise cited was 49.7 decibels. In my yard I already have a six foot wall at the back of the yard that is adjacent to the south end of the dog park. My back yard borders the dog park and I have a six foot wood fence already in existence. I took measurements with a OSHA noise meter (a handheld meter bought from Frys for \$69.99.

Measurements range from 49 up to 68 decibels with a 6 foot fence already installed. The proposed mitigation in the report said to build a 6 foot wall on the east boundary of the dog park. I disagree with that assessment. First, a six foot wall will negatively impact the riparian area the wall would border because the sun will be blocked. Second, a six foot wall will *not* mitigate the projected noise of the dog park.

The EIR table that speaks to the dog park cites that there will be significant noise impact to the surrounding neighbors to the dog park.

My comment on the EIR language is that a dog park is an inappropriate use of that square footage. My suggestion is to designate the area as a riparian restoration consistent with the existing riparian area immediately to the east of the dog park.

2. The map of the dog park shows a grass circle in the southwest corner of the dog park. The circle area border *three* single family homes.

The map depiction suggests the circle area may be a high intensity use area. My comment is to delete that area and respecify it with native trees and/or manzanita shrubs.

3. I did not see anywhere in the EIR addressing where water will be available to maintain all of the green areas. I see the lack of available water to be the biggest environmental impact.

4. Suggest the design include less use of green space that will challenge the city's ability to locate water to maintain the area. As an alternative, suggest designating one of the grassy sports area to be asphalt and/or clay tennis courts (not grass courts).

Submitted by
Pamela Gran
1427 Rubenstein Ave
Cardiff, CA 92007
760-634-1132

S11-1

The commentor, who lives south of the proposed dog park area, provides information regarding the noise levels measured in her backyard and the opinion that the proposed 6-foot high noise barrier would not mitigate noise impacts. As detailed in the EIR and the Noise Impact Analysis, Appendix E of the EIR, the proposed mitigation requiring a 6-foot high noise barrier located along the eastern boundary of the dog park would adequately reduce noise levels at sensitive residential receptors near the northeast corner of the dog park. This specific area is where a potentially significant noise impact from future dog park noise levels was identified. Other areas surrounding the dog park would not be exposed to noise levels from park activities exceeding the City's noise ordinance limits. These noise sensitive residential areas to the south and west of the proposed dog park either have existing walls or a wall is proposed as part of the project.

It should be noted that there are many variables that influence the effectiveness of a noise barrier. The commentor discusses an existing 6-foot high fence as a example as to why the noise mitigation would not work; however, a typical wooden fence is generally not considered adequate as a noise barrier because of spaces between the wood slates and other gaps and openings that allow noise to pass through. As specified in Mitigation Measure Noise-1 of the EIR, the required noise barrier would be properly located and made of solid material with a specific density and no gaps. These requirements would create an effective noise barrier that would adequately reduce noise levels as detailed in Section 5.1 of the Noise Analysis.

S11-2

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

S11-3

Water demand and supply for all components of park use is provided in the Section 3.11.3 of the Public Services and Utilities Section. Water demand is divided into potable and recycled water (see Tables 3.11-3 and 3.11-4 of the EIR) and the ability of the local service providers to have adequate supply available for park use follows each table. The total average annual potable water use is estimated to be approximately 6.3 acre-feet per year (approximately 5,628 gpd). This is a very small amount compared to San Dieguito Water District's (SDWD) average potable water demand for 2000-2005, which was 7,300 acre-feet per year (approximately 6.52 mgd) and SDWD has indicated they would be able to meet the park's potable water and fire flow demands. A substantial portion of the park's water requirements, approximately 96 percent, would be met through the use of recycled water. All recycled water would be provided from the San Elijo Water Reclamation Facility. The San Elijo Water Reclamation Facility currently has 980,000 gpd (0.98 mgd) excess capacity to provide recycled water and is actively looking for new recycled water users. Thus the San Elijo Water Reclamation Facility would be able to serve the recycled water demands of the proposed park

S11-4

As indicated in Section 3.11.3 of the EIR, there is excess recycled water available from the San Elijo Water Reclamation Facility that would be used for irrigation of most landscaped and turf areas. The excess availability of reclaimed water eliminates any challenge for the City to find adequate recycled water for irrigation of green space within the park. The inclusion of additional impervious surfaces, such as an asphalt of clay tennis court over an area planned for pervious turf surface would require more drainage and stormwater runoff measures to ensure no water quality impacts would result. These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR or supplemental information packet in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

Lynn Braun Marr and Russell T. Marr
434 La Veta Avenue
Encinitas, CA 92024
760-436-0129



June 16, 2008

Attn: **Scott Vurbef**, Environmental Coordinator, City of Encinitas
505 South Vulcan Ave.
Encinitas, CA 92024

Re: Comments for Planning Commission, the consultant and Staff regarding revised E.I.R. for Hall Property currently designed as Specialty Sports Park rather than the desired Community Park

Dear Mr. Vurbef and to whom it may concern:

We appreciate this opportunity to offer our comments regarding the revised draft E.I.R., posted on the City's website in four sections. Again, we are concerned that the development plan, as proposed, is not in keeping with the requests and findings made at the public workshops prior to adoption of the plan, and also that the existing plan and objectives are inconsistent with the Goals of the City of Encinitas as expressed in its General Plan, as well as being inconsistent, internally, within this park project's goals and objectives.

Specifically, we feel that the project places too much emphasis on a regional sports complex, including three dedicated fields for both day and *nighttime* use, which would cause additionally problems of lighting pollution and interference with scenic viewsheds caused by multiple lighting standards, planned to be 90 feet high. *Also a regional sports complex with nighttime tournaments would cause excessive and immitigable traffic circulation congestion impacts.* Again, we strongly object that this project should not go forward until the revised overlay traffic circulation element study for the entire City of Encinitas is re-released. We feel that the traffic analysis portion of the revised report is flawed because to use the current numbers is speculative, at best.

On page 32 of Part 4, the revised E.I.R. states, in part: "There are no feasible mitigation measure through which the project could bring about a substantial reduction in ADT's, VMT or fuel consumption . . . or increase the use of alternative transportation." If the park were planned as originally envisioned, as a community park, with more passive use areas, and not as a regional sports complex, traffic could be significantly decreased. We would not have so many car trips from out of County and out of state locations. Thus it is incorrect for the revised report to conclude, "GHG emissions related to vehicle trips are largely beyond the project control." By the City's not staging night games, and closing the park at sunset, vehicle trips could be significantly reduced.

With regard to Air Toxins Risk and Evaluation, this is tied directly to traffic. The analysis from 2005 to 2030 cannot be accurately predicted at this time. As far as the revised report's statement on Page 5 of Part III, "Soil contamination is not significant as hazardous soil would be removed," this is overly simplistic. Hazardous soil removal is problematic on both this public site and on private sites where development has been stopped or slowed down due to challenges with hazardous soil conditions caused by property being used as former greenhouse purposes, with resulting pesticide contamination, etc.

Section 3.3.4 lists significant impacts including exposure to soil contaminants, and also as related to climate change, specifically mentioning lighting. Most people in this City would be fine if

S12-1

The commentor expresses that they feel the park design does not reflect the outcome of the workshops that the City of Encinitas had for residents in the developmental stages of the project's design. No specific comments are provided on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

S12-2

Section 3.1 of the EIR, Land Use and Public Policy, provides analysis of the proposed project's consistency with applicable City of Encinitas goals and policies. As detailed in the EIR, this land use and policy analysis found that the project would not result in inconsistency with public policies that would result in significant environmental impacts. The proposed park has been designed specifically to achieve the project objectives.

S12-3

The commentor expresses opposition to the current design and intensity of uses as proposed in the project. This comment does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet. The subject of lighting and aesthetics is addressed in Section 3.5 of the EIR.

S12-4

The commentor refers to the proposed park as a regional sports complex; however, the number of athletic fields included in the proposed project does not provide adequate facilities to host large regional sporting events. A large tournament event would require more than the two full sized softball/baseball fields or four full sized soccer fields that would be available at the proposed park. The traffic analysis prepared for the EIR used the most current traffic numbers available at the time of report preparation.

S12-5

The commentor is correct that alternative park design could reduce traffic volumes. The EIR includes alternatives that could reduce traffic volumes through reduced intensity design including the Reduced Intensity Alternative and the Citizens for Quality of Life Alternative as well as the No Athletic Field Lighting Alternative which would exclude outdoor nighttime activities as suggested by the commentor. However, the Greenhouse Gas Emissions Analysis referenced by the commentor does not address the emission reductions that may result from reduced intensity design alternatives; rather it provides an analysis of the project as proposed. For this reason, the analysis considers mitigation measures that could be applied to the proposed project and not a redesign of the project components.

S12-6

The commentor states that traffic in future years cannot be accurately predicted at this time. CEQA requires an analysis of cumulative conditions. Therefore, the traffic analysis for the project provides an analysis of future traffic conditions in 2010 and 2030 based on forecasted average daily trips provided SANDAG.

S12-7

Potential impacts related to contaminated soils are addressed in-depth throughout the EIR. Section 3.3, Air Quality identified a potentially significant impact (Impact Air Quality-1) related to exposure to airborne soil particulates and provides mitigation to reduce the potential for impact to less than significant. Section 3.6, Hazardous Materials also investigates potential impacts related to soil contamination in Impact Hazardous Materials-1 and provides mitigation to reduce potential impacts.

S12-1

S12-2

S12-3

S12-4

S12-5

S12-6

S12-7

S12-8

there were no nighttime games. The project should be redesigned so that what was addressed at the original workshops is better reflected in the plans. We don't need games until 10 P.M. at night. This would cut back on the adverse affects of lighting, and no special light standards would be required, also cutting down on costs.

The specific Goals and Project Objectives, #1 speaks to adequate facilities for *all* active uses. #4 addresses adequate recreational facilities for *all user groups*. These two objectives are in alignment with the workshop findings that were compiled, previously. However, they are not in concurrence with #2, which states the objective is to maximize the number and use of athletic fields that help to off set the "unmet needs of Encinitas." By emphasizing athletic fields over other active or passive recreational uses, addressed at the workshops, this becomes a special interest specialty park rather than a broader based community park. This leaning toward developing the park for special interests to increase the profits, we presume, of local businesses who sponsor sports teams, and who hope to get more out of town patronage to help their bottom line, is also evident in the phrase "unmet needs of Encinitas." This should read, the unmet needs of the *citizens* of Encinitas. The way this is written, it seems that the objective is to meet the unmet needs for athletic fields for the City of Encinitas, as in staff and officers of the City of Encinitas; *not the people*, but the government of Encinitas, which, in the past has given us all the definite impression that it is catering to developers and to increased expansion beyond our ability to absorb and adapt to the traffic and other environmental impacts, including community character and quality of life.

In conclusion, we feel that the Draft E.I.R. does not adequately address the real expressed needs of the citizens, including more passive uses for the park, fewer, and multi-purpose, fields, no lights, so that traffic impact and light pollution impact for the neighbors will be mitigated, as well as our questions of community character and viewshed, which are also not addressed. Ninety foot light poles are not in keeping with our General Plan, and represent immitigable impacts which can easily be avoided by eliminating the lights altogether, so that the park is for daytime use, only, as are other parks, including beach access parking, in Encinitas. One way to encourage more passive use, with less hardscapes, would be to above ground, or daylight, Rossini Creek, also increasing more meadow-like fields, and walkways. The dog park section could be made bigger, but should not be located near Rossini Creek. The community teen center is not needed. There is already a wonderful community center near Oak Crest Park, and this is not overly crowded. The amphitheater is also not necessary, and should be eliminated, along with the swimming pools, at this time. In our opinion, and the opinion of everyone we have spoken to, hardscapes, such as the use of cement and concrete, should be kept down, and the passive uses increased.

Thank you, for your courtesy and professionalism, Mr. Vurbef. We are grateful for this opportunity to give the City our input on the revised EIR and the updated consultants' report for the Hall Property. Again, this park can and should be a gem for our entire community, and we look forward to hearing back from you regarding our comments.

Sincerely,

Lynn Braun 

Russell Marr

S12-8
cont.

S12-9

S12-10

S12-11

S12-8

The No Athletic Field Lighting Alternative is analyzed in the EIR and would eliminate the lighting of athletic fields and thus exclude outdoor nighttime activities as suggested by the commentator. The City decision makers will decide whether to adopt the project\with lighting. The commentator expresses opposition to the current design and intensity of uses as proposed in the project. This comment does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet.

S12-9

The commentator expresses that they do not agree with the City's characterization of the objectives of the project and that the objectives do not reflect the outcome of the workshops that the City of Encinitas had for residents in the developmental stages of the project's design. The project objectives for the park were developed by the City and considered both input from the public workshops as well as the need to provide additional park facilities for the City to address documented unmet recreation needs. No specific comments are provided on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

S12-10

The suggestions provided by the commentator have been encompassed in the range of alternatives analyzed in the EIR. Chapter 7 includes multiple alternatives that analyze less intense park use. These alternatives include the Reduced Intensity Alternative and the Citizens for Quality of Life Alternative which reduce the number of athletic fields, provide more passive areas, and reduce or eliminate other park features as suggested by the commentator. The No Athletic Field Lighting Alternative eliminates the lighting of the athletic fields as recommended by the commentator. The commentator expresses opposition to the current design and intensity of uses as proposed in the project. This comment does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

S12-11

The commentator thanks the City, but does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

To the City Council of Encinitas:

This letter is in regards to the information from the new report on the environmental impact to the Hall property. There are basically two things that seem to have been left out of this report. The report says that there will be minimal to no impact from exhaust emissions from the automobiles on the I-5. However, the report does not take into account of the 300-400 cars per hour that will be added to the traffic in Cardiff due to the use of the Park at the Hall property. Also, does the report realize that these 300-400 cars an hour will not have sufficient parking and they will be blocking most of every street in Cardiff while producing exhaust emissions?

S13-1

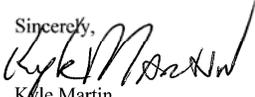
The second point of this new report was supposed to deal with greenhouse gasses. The original plan for the park area had about 50% of the land planted with trees. The new plan has removed almost all of the trees and will be solid sports fields, which will not help with greenhouse gasses.

S13-2

In closing, the removal of the trees combined with the addition of hundreds of cars cannot possibly have a good ecological impact on Cardiff and the City of Encinitas.

S13-3

S13-4

Sincerely,

Kyle Martin
1702 Glasgow
Cardiff, CA 92007

S13-1

The greenhouse gas emissions calculations are based upon the traffic analysis prepared for the proposed project. The traffic analysis includes project generated traffic. Section 4.1 of the Traffic Analysis details how each traffic scenario was evaluated without project traffic and then with the inclusion of project traffic. Thus, the vehicles trips resulting from park operation are accounted for in the greenhouse gas emission calculations.

S13-2

As detailed in EIR Section 2.5.11 and Section 15 of the Traffic Analysis, the proposed park includes adequate onsite parking spaces for typical park operation and park users will not have to drive local roadways searching for street parking. Mitigation is provided for the three to four special events per year that may exceed the available onsite parking spaces (Mitigation Measure Traffic-8). It should be noted that while the Trip Generation and Distribution discussion in the EIR and Traffic Analysis do show that midday Saturday park operations could generate almost 200 inbound and 200 outbound trips per hour, this trip generation is a peak condition and this trip volume is not indicative of traffic that would occur during each hour of park operation.

S13-3

The greenhouse gas emission analysis considers only the project as proposed. As detailed in the greenhouse gas emissions analysis under the heading, Additional Sources Affecting Project-Related GHG Emissions, the analysis does not attempt to quantify how the removal of existing onsite vegetation and subsequent installation of landscaping, trees, and vegetation associated with the proposed project would affect the total amount of carbon sequestered on the project site because the effect of vegetation relative to total project GHG emissions is minor. Any resulting reduction would be minimal and not change the overall conclusions of the report.

S13-4

The commentor does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

TO: THE CITY COUNCIL / CITY STAFF
RE: HALL PROPERTY, EIR/CEQA
STUDY
FROM: Patrick O'Connell 4/15/08

2008 JUN 16 AM 4:56

MY ATTEMPTS TO HIRE EIR REVIEW-
EIR COUNCIL
EIR EXPERTS DID NOT MATERIALIZE. THE
EXPERTS CITED CONFLICTS OF INTEREST,
OR ONE JUST QUIT WITH NO REASON
GIVEN. WITH THAT HERE IS MY SUMMARY.

A PROBABILITY STUDY IS CONCERNED
WITH FACTS, BASED ON CAUSE AND EFFECT
THE LIKELIHOOD OF RESULTS OR OUT-
COMES FAVORABLE OR UNFAVORABLE,
PROBABLE OR POSSIBLE OPEN AND
WITH AS MUCH OBJECTIVITY AS
POSSIBLE.

ALL THE TECHNICAL SCIENCE, CLEAN
AIR, WATER, CHEMICALS, AND SUCH STUD-
IES ARE BEYOND ME, NO OPINION
HOWEVER NOISE, TRAFFIC, LIGHT-
ING, OPERATING IMPACTS, LAND USE
AND ZONING COMPLIANCE IS FAIR
GAME.

YOUR STAFF HAS BEEN HELPFUL
IN MY LIMITED PAPER CHASE.

COMPARATIVE STUDIES ARE FEW,
BUT I CITE THE 2003 ECKE YMCA
TRAFFIC STUDY BY URBAN SYSTEMS ASSOC
JOB # 004907, SINCE THE 2003 STUDY
THE YMCA HAS HAD A 15% PER YEAR
MEMBERSHIP INCREASE, TODAY 32,700
MEMBERS EXCLUSIVE OF DAY CAMP.

S14-1

The commentor does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

S14-2

The commentor cites a 2003 Ecke YMCA traffic study and concludes that the onsite parking for the proposed project is inadequate. A parking analysis specific to the Hall Community Park project was prepared and is included as Section 15 of the Traffic Analysis and Section 2.5.11 of the EIR. The parking analysis found that the provision of 419 onsite parking spaces would be adequate for anticipated normal park operations. Mitigation is provided for the three to four special events per year that may exceed the available onsite parking spaces (Mitigation Measure Traffic-8).

YMCA PARKING BOTH LOTS TOTAL
 544 SPACES ONSITE,
 HALL SPONS PARK 429 TOTAL SPACES
 PEAK TIME YMCA 50-75 CARS PARK-
 ED ON SAXONY BLVD. S14-2
 cont.

CONCLUSION: SPORTS PARK ON
 SITE PARKING INADEQUATE.
 SUGGESTION: BUY RASPY PARDENNY
 INCREASE PARKING BY 40%-50%.

TRAFFIC FLOW:
 TWO OPENINGS IN ADEQUATE, AT
 PEAK TIME, WITH TIME DELAYS AND
 SPILLOVER PARKING ON RESIDEN- S14-3
 TIAL STREETS OFF SITE: CUT CORNER
 CONVISSION, AND CHADS: MORE OPENINGS

NOISE LEVELS
 UNKNOWN WITH OUT AUDIOMETEL
 STUDY, 'PA' SYSTEM TESTS, AND S14-4
 INCLUDE AUTO 'ROOM BOXES,'
 AND CONCERT EFFECTS.

LIGHTING NIGHT OUTDOORS
 UNKNOWN WITH OUT LUMENS
 STUDY, STUDIES AVAILABLE, CONSI- S14-5
 DER DAY USE ONLY AS OLIVEN -
 HAIN USE IN ZONING PERFORMANCE
 STANDARDS, SEE 30140.0104
 LIGHTING PROHIBITIONS.
 MODULIZING

ALL THE ACTIVITIES, ARE SIZES ARE
 MUCH LIKE MODULES, YOURS
 SWIM STADIUM COULD A MODULE S14-6
 AREA L X W = MODULE SIZE, A MODULE
 COULD BE MOVED TO OTHER LOCATIONS
 REDUCING IMPACTS & PROBLEMS.

S14-3

Multiple access points are provided to the park site. Additional access points from other surrounding areas are not feasible due to the freeway located adjacent to the entire east side of the proposed park and existing residential neighborhoods located to the south and west of the project site.

The commentor does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary. Park access is discussed in Section 15.3 of the Traffic Analysis.

S14-4

The Noise Impact Analysis provides a full evaluation of potential noise impacts that would result from construction and operation of the park. The noise analysis includes evaluation of the use of amplification devices and mitigation is provided for potential noise impacts resulting from amplification (Mitigation Measure Noise-3 in the EIR).

S14-5

A lighting analysis was prepared for the proposed project and is also summarized in the EIR. The lighting restrictions applicable to the Olivenhain community are discussed in Section 3.5.3 of the EIR and do not apply to the project site.

S14-6

The location of the aquatic center does not result in any significant impacts. The design of the park was based upon multiple considerations, including input from the public workshops held by the City and site specific features. The EIR contains multiple alternatives that reduce the intensity of uses in the park and provide for park facilities in different locations, such as the Reduced Intensity Alternative and Citizens for Quality of Life Alternative. The commentor does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

(3) 6/15/08

PROPOSALS

FOR THE POOL CONSIDER THE BLUE AREA ABOVE AND SOUTH OF THE SENIOR CENTER. THIS AREA IS SERVED BY MAJOR ROADWAYS AND HAS A PARKING LOT AVAILABLE AS A POSSIBILITY.

S14-6 cont.

OTHER AREAS ARE WORTH CONSIDERING, I QUESTION THE NOTION OF LOADING ALL THE IMPACTS IN ANY RESIDENTIAL ZONE, IS IT CONTRARY TO THE GENERAL PLAN AND "CEQA" POSSIBLY?

S14-7

The EIR provides a complete analysis of the project's consistency with the City of Encinitas General Plan in Section 3.1.3. As stated in the EIR, within the R-3 zone, parks may be authorized with the issuance of a Major Use Permit. The City would be required to obtain a Major Use Permit and this requirement is included in the list of necessary actions and approvals in Section 2.8 of the EIR.

LAND USE

IS A MAJOR USE PERMIT THE PROPER VEHICLE FOR THIS CHANGE IN R-3 USE? OR IS A SPORTSPARK ALLOWED, OR IS SPORTSPARK A COMMUNITY PARK OR IS A CHANGE AS FUNDAMENTAL AS THIS A REZONE? CONCLUSION.

S14-7

THE EIR - IS A PAPER STUDY, OPEN TO SUGGESTIONS AND CHANGES THE COUNCIL IS UNDER PRESSURE FROM ALL CONCERNED PRO AND CON, AND OPEN MINDEDNESS IS IMPORTANT. NO SURPRISES, RESPECTFULLY,

S14-8

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the EIR in identifying and analyzing the project's environmental impacts and are therefore noted for the record.

Yvonne Cannon
409 S HARFIELD AV
CAROLINE

S14-8

760 753-5145, 760 413-4725

Polovina 200 Pol. Comm.



ROTHE
TECHNICAL
RESEARCH

Dietmar E. Rothe, Ph.D.

Professional Engineer and Scientific Consultant
1404 Rubenstein Avenue, Cardiff by the Sea, CA 92007, U.S.A.
FAX: (760) 753-2227 E-mail: dietmarr@earthlink.net

June 14, 2008

To: Scott Vurbeff, Planning and Building Dept., City of Encinitas
RE: Planned Hall Property Special Use Park
Case Number: 04-197 MUP/CDP/EIR

COMMENTS TO RECIRCULATED PORTIONS OF DRAFT EIR
by sra/EDAW for City of Encinitas

I have serious issues with several aspects of sra's risk evaluation under PART 2: CHILDREN'S HEALTH RISK ANALYSIS (July 24, 2007) and under PART 1: AIR TOXICS RISK EVALUATION (July 9, 2007).

(1) The averaged meteorological data from the Del Mar Monitoring Station, operated by Mira Costa College and located at 225 Ninth Street, Del Mar, is insufficient, misleading and misrepresents conditions at the Hall site for several reasons.

(a) The Del Mar monitoring station is only circa 550 feet from the ocean's edge and represents only a local seashore microclimate with more or less steady onshore breezes from the WSW direction, perpendicular to the shoreline, and with few calm spells occurring only 2.2% of the time. The Hall site, being 0.6 miles inland and 200 ft above sea-level, lies at the interface where sea breezes meet with the more variable regional climate and exhibit, during a typical day and night, calm periods that add up to more than 50% of the time, specially during late fall, winter and early spring. As will be explained later, calm conditions are the most dangerous health hazard, because particulates from diesel emissions hang stagnant over both sides of I-5, accumulating for hours to dangerously high levels.

(b) The use of averaged wind direction and speed data completely masks the hourly preponderance of calm periods during early morning, late afternoon and night periods. The averaged wind rose (Fig. 5 in Part 2, Page 13), for example, gives the erroneous impression that wind is virtually always blowing upwind from the WSW, driving the polluted air away from the site. It also implies erroneously that the worst condition for dangerous diesel fumes on the proposed sports fields would occur only when high winds are blowing downwind from the ENE direction, perpendicular to I-5 towards the site. In fact, the more dangerous situations are when winds are most gentle and blowing at shallow angles to I-5 or along the I-5 corridor.

S15-1

The commentor introduces his letter outlining concerns regarding the Children's Health Risk Analysis and Air Toxics Risk Evaluation. Specific comments are provided in the body of the comment letter. In the following responses, it is important to emphasize that the Air Toxics Risk Evaluation and the Children's Health Study are two very different analyses. While both address issues of exposure to pollutants from vehicles on I-5, the two studies address different issues and require different methodologies

S15-2

The commentor indicates that averaged meteorological data from the Del Mar Monitoring Station is insufficient. The wind rose from the Del Mar monitoring station is provided in the Air Toxics Risk Evaluation for informational purposes only, and shows general meteorological trends at that station. The data were not used in the Air Toxics Risk Evaluation dispersion modeling analysis for reasons that are discussed below in response to comment #S15-3, S15-4, S15-5. The data from the Del Mar monitoring station were used in the Children's Health study as one of the factors in making a judgment of the severity of the risk to children's lung functions. Upon inquiry, meteorologists at the San Diego Air Pollution Control District (APCD) were of the opinion that, while the Del Mar data does not meet the requirements for the dispersion modeling of the Air Toxics Risk Evaluation, the Del Mar data provides suitable information for the Children's Health Study regarding wind speeds and directions for the project vicinity (Bill Brick, Senior Meteorologist, San Diego Air Pollution Control District). More information is provided in response to comment #S15-5.

S15-3

The commentor indicates that the Del Mar data are not representative of the site because during a typical day and night, calm periods that exist at the project site add up to more than 50% of the time, especially during late fall, winter, and early spring.

The City is entitled to rely on the conclusions reached by the experts who prepared the Air Toxics Risk Evaluation and the Children's Health Study. While others may disagree with the premises or methodology used to develop these studies, they are based on substantial evidence, and thus are adequate to support the City's conclusions regarding the environmental impacts of the project. (See *Laurel Heights Improvement Ass'n v. Regents of the Univ. of California* (1988) 47 Cal.3d 376, 408.)

Based on numerous observations from meteorological monitoring stations throughout the United States, no sites would truly have "calm" periods for 50% of the time. Calms are defined in the U.S. EPA's *Meteorological Monitoring Guidance for Regulatory Modeling Applications* (EPA-454/R-99-005) (EPA 2000) as occurring "when the wind speed is below the starting threshold of the anemometer or vane, whichever is greater." Calms require special treatment in applications such as the U.S. EPA's approved air dispersion models to avoid division by zero in the steady-state dispersion algorithm. The U.S. EPA recommends that wind speeds less than 1 meter per second be reset to 1 meter per second for use in steady-state models. The U.S. EPA's regulatory guidance was followed in conducting the Air Toxics Risk analysis for the Hall Property.

The commentor has submitted data from the McClellan-Palomar airport. "Calm" for this station, and likely at similar airport stations, is all data less than 3 knots, or approximately 1.6 meters per second. This cutoff is suitable for aircraft operations, but not for pollutant dispersion modeling, nor for assessment of overall wind characteristics. As shown in the Children's Health Study, calms, as measured on the Del Mar instrumentation, occur less than 1.5 percent of the time on an annual basis. This is significantly less than the calm periods indicated by the commentor. As described in response to comments #S15-2 and #S15-5, the data from the Del Mar monitoring station is considered most suitable for the project site.

S15-1

S15-2

S15-3

S15-4

S15-3 (continued)

Further, the airport data are measurements made at an instant of time, usually once per hour; that is, snapshot. The data are not averaged, and do not represent conditions over an entire hour. The continuously measured conditions at the Del Mar station provide a more thorough and accurate depiction of the meteorological conditions than a once an hour snapshot of conditions as recorded by the airport.

S15-4

The commentor argues that the use of averaged wind direction and speed data completely masks the hourly preponderance of calm periods during early morning, late afternoon, and night periods.

Averaged wind direction and speed were not used in the air dispersion modeling analysis. The modeling analysis necessary for the Air Toxics Risk Evaluation, described below, requires the use of at least one year of meteorological data, and that each hour of that year is used in the air dispersion model. Thus, commentor is incorrect in implying that "averaged" wind direction and wind speed data were used in the analysis. As discussed above, meteorological data that are used in U.S. EPA regulatory air dispersion models require specific parameters to be measured and require pre-processing using the U.S. EPA's meteorological data processors. These data processors require wind speed, wind direction, temperature, solar insolation/cloud cover, and boundary layer mixing height, collected using upper-air soundings. Most meteorological stations do not record all of these parameters because they are not used in recording general weather data. Prior to conducting the Air Toxics Risk Evaluation for the Hall Property, SRA and EDAW contacted the Meteorology and Modeling Section at the APCD to ascertain whether there were any pre-processed meteorological data sets available for the immediate vicinity of the Hall Property site, and to obtain the recommendation of the meteorologists at the APCD who are responsible for reviewing and approving health risk assessments conducted under state and local programs. The APCD referred to their *Supplemental Guidelines for Submission of Air Toxic "Hot Spots" Program Health Risk Assessments (HRAs)* (SDAPCD 2006) for guidance on the use of meteorological data in health risk assessments. The Guidelines state that "Meteorological data used for refined HRAs should be from either San Diego Lindbergh Field (surface data from Lindbergh, Station 23188 and upper air data from Miramar, Station 93107) for coastal San Diego River-plain and low-lying terrain near San Diego Bay (including downtown San Diego), or Miramar MCAS (surface and upper air data from former Miramar NAS, Station 93107) for inland or upland/mesa locations. The District Meteorology Section may be consulted to determine if a location is coastal/low-lying maritime or inland/upland." Upon consultation with the District, because Lindbergh Field is subject to influence from the terrain on Point Loma which affects wind direction, the APCD recommended the use of Miramar surface and upper air data for the modeling analysis.

(c) For this reason, I have made my own wind-related risk assessment, based on verifiable, reliable hourly data from a nearby site that has wind patterns more closely resembling the conditions at the Hall site. That analysis is attached hereto as the main part of this paper.

S15-5

(2) The I-5 traffic ADT numbers in Table 1 (Part 1, Page 3) appear to be already outdated, and predicted future traffic figures are much too conservative, particularly with respect to heavy truck traffic. Total Traffic for 2010 of 235,000 ADTs is already exceeded on many days in 2008. Also the 2010 Heavy Truck ADTs (3+ axles) of 5951, amounting to only 2.5% of total traffic, appear to be too low. Anyone who commutes on I-5 to and from San Diego will confirm that in the last 5 years the percentage of trucks on I-5 has doubled, and that trucks amount to somewhere around 10% or more of traffic on weekday mornings and late afternoons, when soccer and baseball games are going on.

S15-6

Already in 2005, Hayden Manning, spokesman for Cal. Dept. of Transportation in San Diego, stated that 5500 18-wheel, heavy semis (5-axle trucks) cross daily from Mexico into San Diego County at Otai Mesa and San Ysidro. He predicted this number to grow to 8500 in 2010. This same truck traffic has to return to Mexico, putting 17000 ADT of heavy 5-axle Mexican semis on I-15 and I-5 in 2010, most going to and coming from industrial East Los Angeles and to and from Long Beach Seaport for shipments to and from Overseas (a consequence of NAFTA). Assuming a conservative 35% of this traffic travels on I-5, we already have 5950 Mexican 5-axle trucks per day on I-5. Adding to this a conservative 3000 Heavy US Semi Trucks, we now have some 9000 Heavy Trucks, not counting 3-axle and 4-axle trucks.

S15-7

These ADT estimates appear to be consistent with Hasan Ikhtrah's (Planning and Policy Director of Southern Calif. Association of Governments) 2005 statement that "by 2020 one in every 10 vehicles on the freeway will be a big rig."* This would put 28,200 big rigs a day on I-5 in 2020. This is also consistent with statements made by John Duve, who is the freight management spokesperson for SANDAG, that "freight traffic will double in about five years and will double again five years after that."*

Compare this with the measly 10% increase in truck traffic every 5 years shown in Table 1 on Page 3 of Part 1. Thus, Table 1 does not reflect reality by a long shot.

The additional bad news is that a large percentage of heavy diesel trucks are Mexican and do not necessarily conform with California emission standards, thus contributing an inordinately large amount of particulate pollution, detrimental to children playing soccer next to a 16-lane super-freeway.

(3) Following are objections to specific statements made in Parts 1 and 2 of the SRA analysis not already addressed:

Pt.1, p.1 "I-5 runs in a north south direction ..."

Comment: I-5 runs in a NW to SE direction, deviating from true north by 32°

S15-8

* Source: Mark Walker, North County Times, "Region's Freeways to See More Big Rigs," (Encinitas, CA, Feb.27, 2005)

S15-5

The commentor states that he has made his own wind-related risk assessment based on data from McClellan-Palomar Airport. As stated above in response to comment #S15-4, the U.S. EPA's approved air dispersion models require specific, pre-processed meteorological data in a format that is specific to their use in dispersion models. The commentor's risk assessment that was attached to the comment letter did not involve the use of air dispersion modeling, which is critical to the preparation of an air toxics risk assessment. Rather, the attachment provides a discussion of meteorological data from the McClellan-Palomar Airport monitoring site with no calculation of downwind concentrations nor processing of the data for use in air dispersion models. No air dispersion modeling was conducted in the attachment to the comment letter, nor were risk calculations conducted. The risk assessment that was prepared for the Hall Property, in contrast, was prepared in accordance with the California Office of Environmental Health Hazard Assessment's *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2003) and the APCD's *Supplemental Guidelines for Submission of Air Toxic "Hot Spots" Program Health Risk Assessments (HRAs)* (SDAPCD 2006), which set forth the requirements for the preparation of health risk assessments under state and local regulations.

S15-6

Data used to estimate traffic for the Health Risk Assessment were obtained directly from the Caltrans and are based on their actual traffic counts for the segment of Interstate 5 adjacent to the Hall Property. Forecast future traffic volumes are provided by SANDAG and Caltrans and are based on complex modeling processes performed by professional traffic engineers.

The commentor's discussion of traffic counts is speculative and does not provide actual data obtained from traffic counts on that segment. Therefore the data collected by Caltrans are considered the best available data from which to obtain traffic data for the study.

The comment states that the 2010 traffic volume estimate of 235,000 ADT is already exceeded on many days in 2008. However, the 2007 traffic counts for this segment of I-5, which are the latest counts available, show an average daily count of 220,000 and with the average during a peak month of 230,000 ADT. The commentor's perception of existing heavy truck traffic is that the heavy truck fraction of traffic is 5 to 10 percent of the total. However, the truck counts at Leucadia Boulevard, which are the nearest and most recent counts, show a heavy truck percentage of approximately 3 percent.

S15-7

With respect to future Mexico to San Diego truck volumes, the comment quotes a local newspaper article and does not provide any additional information on his assumption of the fractions of Mexican trucks that would travel northward on the I-5 segment in Encinitas. Neither of the other quotes from the same newspaper article is directly or indirectly related to I-5 traffic in north San Diego County. One of the sources is from the Southern California Association of Governments, which plans traffic for Los Angeles, Orange, Riverside, and Imperial Counties, not San Diego County. In contrast, the growth in truck traffic assumed for the health risk study was based on trends in truck traffic observed from Caltrans data collection. In preparing these responses to comments, Caltrans was contacted for an updated forecast, and advised that the forecast traffic volume for the I-5 between Birmingham Drive and Santa Fe Drive with the future I-5 "10 + 4" configuration is 332,650 ADT. This is an increase of approximately 7 percent over the value used for 2030 in the health risk analysis. Caltrans assumes that the truck fractions will be approximately the same as at present. (Email from Stephen Thredkeld, Traffic Engineer, Caltrans District 11 to James Kurtz, Air Quality Engineer, EDAW; July 2, 2008).

S15-7 (continued)

In addition, the commentor states that “a large percentage of heavy diesel trucks are Mexican and do not necessarily conform with California emission standards.” The model used to estimate emissions from vehicles, the EMFAC2007 model, is the California Air Resources Board’s standard model, which takes into account a mix of vehicles when representing emissions from heavy-duty trucks, including older vehicles and those vehicles that do not conform with current emission standards. The mix of vehicles assumed represents San Diego County and is consistent with the methodology used to project emissions in San Diego County for the purpose of State Implementation Plan emission inventories and air quality planning inventories prepared by the ARB.

The Caltrans projected design for the freeway is “10+4,” or 14 lanes, not 16 lanes as stated in the comment.

S15-8

The commentor is correct that Interstate 5 does not travel in an exact north-south direction. Interstate 5 generally runs north-south though it does deviate from these true directions at times. The general discussion of the north-south freeway direction is used in text for simplicity of description. The actual configuration of the freeway and its direction were considered in the modeling analysis.

Pt.1, p4 Comment:	“emission factors are based on grams per vehicle mile traveled...” Such data is not valid for traffic moving slowly or for stalled traffic. Data needs to be converted to emissions per vehicle per unit time and then multiplied by the number of vehicles per “source volume” length along I-5.	S15-9
Pt.1, p.4 Comment:	“volume source dimensions were 50 m by 50 m ...” Base area of volume source of 50 m by 50 m is only a good model, if I-5 has present pavement width and if the wind is blowing normal to I-5. After I-5 expansion to 14 + 2 lanes, the width of source (across I-5) should be increased to 80 m. If wind is blowing at shallow angles to I-5, the source length needs to be increased to hundreds of meters, and the number of vehicles in that volume needs to be accounted for.	S15-10
Pt.1, p.5 Comment:	“Table 2” It is not clear whether the emission rate estimates are per vehicle or per assumed volume source	S15-11
Pt.2, p.1 Comment:	numerous references to “proposed community park” The proposed “Special Use Park,” which is really a Regional Sports Complex does not fit the definition of a “Community Park” and cannot be built and operated on the R-3 site under a Major Use Permit.	S15-12
Pt.2, p.5 Comment:	“We breathe air with higher levels of traffic pollutants while... driving in heavy traffic on main city streets and busy highways/freeways.” This is only true if we drive a motorcycle or take in air through windows and/or vents. Car occupants can protect themselves from high exposures to exhaust pollutants by recirculating the air inside the vehicle and filtering out the particulates by passing the air through the air conditioning system. Children on soccer fields have no option to protect themselves. Even face masks would not work, because the athletes need to take in air at a rate 17 times normal.	S15-13
Pt. 2, p.7/8 Comment:	“... children who live close to a freeway in a high pollution area experience a combination of adverse developmental effects because of both local and regional pollution (Gauderman et al. 2007).” So true! I should be noted that San Diego County has repeatedly been rated “F” regarding particle pollution by the American Lung Association, along with other California Counties such as Riverside. More recent monitoring services for regional air quality are consistently reporting “particulates” as the major air pollutant in the San Diego area (Weather Channel on Cable Networks), far exceeding other solid pollutants such as tree and weed pollen. Therefore, even moderate additional exposure to diesel emissions can produce long-lasting effects in children exercising near freeways. It should be noted that carbon particles are not rejected by the body’s immune system and remain in a person’s lungs indefinitely, creating accumulative and permanent damage (like X-ray exposure). Only the hundreds of carcinogenic chemicals clinging to the soot particles are absorbed by the body and passed to other organs, putting those at risk.	S15-14

S15-9

The EMFAC2007 model, which is the California Air Resources Board’s approved model for estimating emissions associated with traffic, provides emission factors in terms of grams per vehicle mile traveled. These emission factors are considered appropriate for use in estimating emissions associated with traffic. The EMFAC2007 model is the basis for all of the California Air Resources Board’s emission inventories.

S15-10

Use of 50-meter by 50-meter volume sources to represent the freeway is an appropriate representation for the volume sources. Use of large volume sources would result in more dispersion and would result in fewer sources. The methodology is consistent with other health risk assessments that have been reviewed and approved by agencies such as the County of San Diego Department of Planning and Land Use and the South Coast Air Quality Management District.

S15-11

The labels in Table 2 above each column state that the emission rates are per source.

S15-12

As discussed in Section 3.1 of the EIR, Land Use and Planning, the Recreation Element of the General Plan designates the project site as a Special Use Park. The definition states that a Special Use Park can provide many of the same facilities as a community park. The Recreational Element further states that a Special Use Park which provides major facilities usually found at community parks, will be considered as community park acreage because they provide facilities serving the entire City or major portions of the City. Although the proposed project is consistent with the description of a community park as defined by the Recreational Element, it exceeds the City’s acreage standards for a community park (10-20 acres). Because this standard would be exceeded, the proposed project is designated as a Special Use Park in the City’s Land Use Element. The title of the project as referred to in the analysis includes “community park” because the uses associated with the proposed project (athletic fields, community center, aquatic center, etc.) are those uses typically associated with the City’s definition of a community park. The Special Use Park designation is a land use as defined in the City’s Land Use Element that allows the proposed uses of the project.

S15-13

The comment refers to a partial quote from background material in the Children’s Health Risk Evaluation. A continuation of the quote discusses other areas of high pollutant concentration and the effects of being downwind from a freeway.

The comment states that athletes need to take in air at a rate that is 17 times normal. Assuming the comment is directed towards children, a California Air Resources Board study of children’s breathing rates indicates that children playing outdoors breathe at 17 liters per minute, while children running breathe at 32 liters per minute. The breathing rate for children sitting, standing, and walking slowly range from 7 to 14 liters per minute. Therefore, depending on one’s interpretation of “normal” the athletic air intake is on the order of 2 to 4 times normal, not 17 times. For adults, the ratio of athletic air intake is on the order of 5 to 7 times normal.

S15-14

The first two words agree with background information in the study; the remainder are commenter’s personal observations and do not support nor disagree with the study or specific comments on the analysis.

Pt.2, p.9
 Comment: "... part of the active area of the proposed project where children would play is within the 500-foot distance from the freeway used as a school siting criterion ..." The 500-foot line is an arbitrary demarcation. It does not mean exposure levels are safe beyond that line. As will be discussed in the attached analysis, the dangerous particulate cloud during calm periods extends far beyond the 500-foot line. S15-15

Pt.2, p.14
 Comment: "It is unlikely that many, if any users of the proposed park would have as many active hours in the park in a week, as children would at school." School children spent most of their day inside buildings with controlled air quality. A child exercising in the open air near a freeway breathes in 17 times more air than normal in an atmosphere that may be 10 to 100 times more polluted than inside school buildings. Thus 1 hour spent playing soccer near a freeway is equivalent to hundreds of hours spent inside a classroom. If schools are prohibited from being built within 500 feet of a freeway, then a child playing sports near a freeway for even one hour a week is exposed to a more dangerous pollution dose than a school child not participating in team sports in a school near the freeway. S15-16

Pt.2, p.14
 Comment: "It is assumed that the truck fraction would remain similar to present, forecasting in a 2030 volume of approximately 8750 heavy trucks per day." As discussed in (2) above, this is refuted by more informed regional Agencies (SCAOG, SANDAG, Cal. DoT) who predict close to 30,000 heavy trucks per day on I-5 by 2020 already. S15-17

Pt.2, p.15
 Comment: "Emission factors for PM₁₀ and PM_{2.5} in 2030 are forecast to be between 18% and 43% of the 2007 values." This prediction is highly hypothetical and may never become actual, when economic and political pressures are included in such a prediction. New bio-fuel production to replace diesel oil would compete with food crops, already in worldwide shortage. Refining hydrocarbon fuels to gasoline standards would cause pre-ignition in present diesel engines. Methane or propane fuels contain much less energy per mole than diesel fuel and would be prohibitive in cost. A better approach would be to go to diesel electric hybrid propulsion, but such plans are not even considered yet. S15-18

Pt.2, p.15
 Comment: "When the forecast decrease in the emission factors is combined with the forecast increase in traffic volumes, the result would be an estimated reduction in PM₁₀ and PM_{2.5} emission to 40 to 60 percent of 2007 levels" As discussed above, the predicted 32% increase in heavy truck traffic between 2010 and 2030 in Part 1, Table 1 is not realistic. An eightfold increase to 40,000 heavy trucks per day on I-5 is more likely. Thus even with a good reduction in emission factors per vehicle, there would be a substantial 400% increase in particulate emission factors by 2030, unless we have entirely new propulsion systems for moving freight by then. S15-19

Pt.2, p.16
 Re Widening of Freeway: "The combination of changes in geometry is not considered likely to make a significant change in pollutant-to-park transport." S15-20

S15-15

The 500-foot criterion was not arbitrary, but taken from the California Air Resources Board conservative recommendation for residential land use near a freeway. The degree of exposure and relative safety with respect to distance are discussed in the studies. As noted in the response to comment #S15-5, the analysis attached to the comments does not include air dispersion modeling, the calculation of pollutant concentrations or risk, all essential elements of a health risk assessment.

S15-16

The comment derives a conclusion that 1 hour spent playing soccer near a freeway is equivalent to hundreds of hours spent inside a classroom. Part of this conclusion is derived from the statement that a child exercising breathes 17 times more air than normal. With respect to that statement, see response to comment #S15-13 above that indicates the ratio of breathing during athletic activity to normal breathing for children is 2 to 4, not 17.

The comment erroneously compares anticipated park play hours with classroom hours, whereas the study clearly indicates that data from the background health studies at schools assessed effects of the full day of school activities including vigorous outdoor activity.

The comment states that schools are prohibited from being built within 500 feet of a freeway, which is not true. Schools may be approved within 500 feet of a freeway following assessment of the anticipated health risk.

S15-17

Please see response to comments #S15-6 and #S15-7.

S15-18

The prediction of reduced PM emissions is based on emission estimates from the EMFAC2007 model, which is the California Air Resources Board's approved air emissions model for estimating emissions from vehicles. This model is used throughout the state of California in the development of emission inventories and is used as a planning tool. The comment regarding the accuracy of the model is speculative and is not based on any data. The comment implies that the predictions are doubtful because of the unknown nature of future development of biofuels or conversion to methane or propane fuels. However, reduced PM emissions are forecast principally on existing regulations mandating cleaner conventional diesel fuels and the phasing in of advanced technology diesel engines. Further, the EMFAC based forecasts are conservative; the Federal Highway Administration forecasts that existing EPA regulations will result in a decrease of mobile source air toxics of 57 to 87 percent by 2020, while accommodating a 64 percent increase in vehicle miles traveled.

S15-19

Please see response to comments #S15-6 and #S15-7 regarding future traffic volumes and response to comment #S15-18 regarding forecasted particulate emissions.

S15-20

Please see response to comment #S15-6 above that describes forecast traffic volumes for the anticipated future freeway geometry.

<p>Comment: This assumes the doubling in the number of freeway lanes would not attract new traffic onto I-5. Such an assumption has been repeatedly proven wrong in the Los Angeles basin. Traffic behaves much like a compressible gas, taking up any volume made accessible to it. Traffic engineers in many communities base their traffic models using the same methodology and algebra that is used in gas dynamics. New freeway lanes will attract new traffic onto I-5 that would otherwise use "surface streets" or I-15.</p>	<p>S15-20 cont.</p>
<p>Pt.2, p.20 "... 80% of the time, the pollutant levels at the park would be similar to other areas in the community that are distant from the freeway"</p> <p>Comment: The attached analysis refutes this statement. During extended calm periods during morning hours and evening hours, when games are planned, the pollutant levels will be dangerously high.</p>	<p>S15-21</p>
<p>Pt.2, p.20 "... [some] playing time would occur on fields that are greater than 500 feet from the freeway, further reducing the amount of time that these park users would be exposed."</p> <p>Comment: This 500-foot demarcation line is only of interest when we have a downwind situation with winds blowing at near right angles over I-5 to the sports fields. See attached analysis.</p>	<p>S15-22</p>
<p>Pt.2, p.20 "... volume of pollutants inhaled by park users would generally be less than on a downwind day at a school located the same distance from the freeway"</p> <p>Comment: This has already been addressed above as being inaccurate.</p>	<p>S15-23</p>
<p>Pt.2, p.20 "... emissions of PM₁₀ and PM_{2.5} would not change notably between 2007 and 2030"</p> <p>Comment: This statement is unfounded and is way off the mark when other traffic predictions by regional traffic planners are taken into account (see above remarks).</p>	<p>S15-24</p>
<p>Pt.2, p.21 "...operation of the proposed Hall Property Community Park would pose a less than significant lung function and asthma risk to children."</p> <p>Comment: This is just irresponsibly wrong. Children playing strenuous sports at the proposed sports complex would be exposed to dangerous lung function, heart function and cancer risks. Don't let our children's lungs be the filters that remove fine soot particles from diesel-fume polluted air.</p>	<p>S15-25</p>

S15-21

Please see response to comment #S15-3 regarding meteorological data and comment #S15-5 regarding the validity of the commentator's wind-related risk assessment.

S15-22

The air toxics health risk analysis was conducted using meteorological data that account for wind patterns during 8760 hours of an entire year and was conducted in accordance with OEHHA guidelines. Please also see response to comments #S15-3 regarding meteorological data and #S15-15 regarding the 500 foot criterion.

S15-23

Please see response to comment #S15-16.

S15-24

The statement that there would be little change in particulate emissions between 2007 and 2030 acknowledges the increases in traffic volumes as described in the studies and discussed further in the response to comment #S15-6. The increase in traffic volumes would be accompanied by an offsetting improvement in emissions controls and reduction in average vehicle particulate emissions as described in response to comment #S15-18.

S15-25

With respect to children's lung function, the conclusions are based on the available background health effects studies and factors related to the proposed project plan and site, and a judgment of the relative health risk. With respect to cancer, the conclusions state the findings of the health risk analysis, which was prepared in accordance with OEHHA guidelines.

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project. These comments do not specifically address the sufficiency or adequacy of the environmental analysis and no response is necessary.

INDEPENDENT ANALYSIS OF WIND-RELATED RISK FACTORS AFFECTING PARTICULATE CONCENTRATIONS ON HALL SITE

1. Why McClellan -Palomar Airport meteorological wind data are more relevant to conditions on Hall site than data from either the Miramar USMC Airstrip or the Del Mar Monitoring Station used in the sra study:

Del Mar Monitoring site is six miles south of the Hall site but only feet from the beach and, as mentioned earlier, is dominated by local onshore ocean breezes. Hourly wind data from that site is not easily available, nor verifiable. So close to the beach, calm periods are rare.

Miramar USMC Airstrip is fourteen miles south-east of Hall site in a different topography. It lies seven miles inland from the ocean and is prone to desert wind conditions. Its topological and geographical location differs just too much from those of the Hall site to be relevant.

McClellan-Palomar Airport is six miles north of the Hall site, where the topography is very similar to the Hall surroundings, with gently undulating ridges between it and the ocean. It lies 2 miles from the ocean, compared with 0.6 miles for the Hall site. Runway is 310 ft above sea level, comparable with the 220 ft elevation of the Hall site.

McClellan's meteorological station supplies accurate hourly wind speed and directional data, which is independently verifiable and which is certified by the National Oceanic and Atmospheric Administration (NOAA) as "Quality Controlled Climatological Data." A sample set of hourly climatological data for the month of October 2007 is attached in the Appendix, as obtained directly from NOAA. Hourly data from McClellan shows typically many long-lasting calm conditions in the early morning and again after sunset and during the night, which are also present at the Hall site. Current wind data is available from the meteorological station. I have compared such data with conditions on Rubenstein Avenue (my home) just west of Hall site and have found excellent correlation of McClellan winds and calm periods with those near the Hall site.

If there are any differences between the two sites, wind speeds at McClellan are often a little higher than at the Hall site, because the Palomar runway goes over the top of a hillock, whereas the Hall site is situated in a shallow valley between two ridges, i.e. between Rubenstein Avenue and Crest Drive.

2. Why micron sized particles remain airborne for a long time:

A particle falling through the air by gravity reaches a terminal velocity, at which the force of gravity on the particle (its weight) is balanced by opposite viscous friction forces. For very small particles, air acts as a highly viscous fluid.

A simple Stoke's flow analysis gives the terminal velocity, V_t , of a small spherical particle as:

$$V_t = d^2 (\rho_s - \rho_{air}) g / 18 \mu$$

where d is the particle diameter, ρ_s its mass density, ρ_{air} is the density of air, g is acceleration due to gravity in vacuo, and μ is the viscosity of air.

S15-26

Response to comment #S15-5 discusses the validity of the Independent Analysis of Wind-Related Risk Factors Affecting Particulate Concentrations on the Hall Site as prepared by the commentor. Additional responses to this comment are provided on page numbered 18 of 18.

S15-26

For a 1 micron (10^{-6} m) size carbon sphere the terminal velocity calculated by above equation is 6×10^{-5} m/s. Thus, the settling time for the particle to drop 1 meter is $1/V_t = 4.6$ hrs/m. A 10 micron particle drops 1 m a hundred times faster, i.e. in 3 minutes.

(Actual microscopic soot particles are not spherical but have a more spongy structure, looking more like snowflakes than spheres. Hence actual settling speeds are even slower and settling times longer than predicted by above Stokes calculation.)

There are two important conclusions to be reached from this analysis:

(1) Submicron particulates stay in the air for many hours, unless they attach themselves to pollen or to fog droplets or rain droplets that then precipitate more quickly. Alternatively, they may attach themselves to plant foliage or be filtered out by children's lungs. These ultrafine PM_1 particles represent the most severe health hazard to lungs, and they do not diminish greatly within 300 ft downwind from a freeway. What diminishes within the 300 feet are the coarser particles (PM_{10}). They may contain the greatest carbon mass but do not present the greatest health risk. This gives a simple explanation why the carbon mass concentration drops sharply with distance from freeway in the first 300 feet, but then remains constant for a much longer distance (Figure 3 Pt.2, p11 - Zhu et al.) Carbon mass is lost over 300 feet, but the most dangerous particles remain.

Because of their longevity, the PM_1 ultrafine particle concentration diminishes only through the process of dilution. With a line source like the freeway, sideways dilution does not take place. The only way the ultrafine particle concentration can be diluted is by drifting to higher altitudes due to wind turbulence.

(2) Under calm conditions, the ultrafine particulates dilute upwards much more slowly by diffusion. In addition, because of their longevity, lasting hours and days, their concentration will accumulatively increase to extreme levels on both sides of the freeway when calm periods last for hours, which they often do at the Hall site.

S15-26
cont.

3. Reduction of hourly wind data from McClellan Airport:

We obtained "Hourly Observation Tables" (Quality Controlled Local Climatological Data) for the months of February, April, June, August, October and December 2007 from the US Dept. of Commerce, National Oceanic & Atmospheric Administration, as recorded at the McClellan-Palomar Airport, Carlsbad, Calif.

These data give hourly wind velocity and directions for representative periods throughout the four seasons of 2007. Wind directions are reported to nearest 10^0 from true north going clockwise around the compass from 0^0 to 360^0 . Calm periods are recorded as "0 000." A representative data table (for Oct 2007) is attached in the Appendix.

For analyzing particulate transport from vehicle sources on I-5 to the project site, wind directions were first transformed into angular deviations D^* from the direction of the I-5 roadway, which was denoted as 0^0 , and were then grouped into directional sectors: $D^* = +90^0$ to $+60^0$ (90/60 sector), $+60^0$ to $+30^0$ (60/30 sector), and $+30^0$ to $+10^0$ (30/10 sector) for winds blowing across freeway toward site, and

$D^* = -10^\circ$ to -30° (-10/30 sector), -30° to -60° (-30/60 sector), and -60° to -90° (-60/90 sector) for winds blowing freeway pollution away from site, $D^* = 90^\circ$ denoting winds blowing at right angles to I-5.

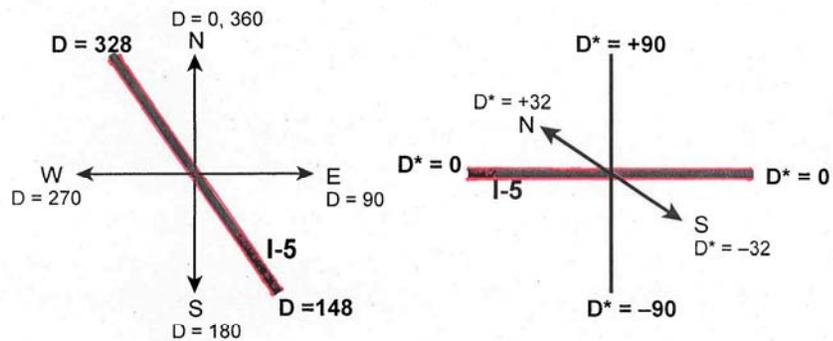
The three remaining groups were:

- (1) Calm
- (2) 0° for winds blowing along the freeway in either direction (between directions of -10° and $+10^\circ$)
- (3) Variable

Wind directional transformation, from D to D^* , is illustrated in diagrams and tables on Page 9

For each hour in the day (say 9 am) the probability of winds falling into a specific category were then calculated from the raw data for each month (say February). Wind speeds for each hour and category were averaged over the month (February). "Average Wind Speed and Percent Probability in a Given Direction" as a function of the hour in the day are tabulated for representative months in Tables on Pages 10 to 15.

S15-26
cont.



WIND DIRECTION TRANSFORMATION

D → D*

$0 < D < 60 \quad D^* = 30 + D$
 $60 < D < 240 \quad D^* = 150 - D$
 $240 < D < 360 \quad D^* = D - 330$

D	D*	D* Sector	D	D*	D* Sector	D	D*	D* Sector
0	+30	6/3	120	+30	3/1	250	-80	-6/9
10	+40		130	+20		260	-70	
20	+50		140	+10	270	-60	-3/6	
30	+60		150	0	280	-50		
40	+70		160	-10	290	-40		
50	+80	9/6	170	-20	-1/3	300	-30	-1/3
60	+90		180	-30		310	-20	
70	+80		190	-40	-3/6	320	-10	0
80	+70	200	-50	330	0			
90	+60	6/3	210	-60	-6/9	340	+10	
100	+50		220	-70		350	+20	
110	+40		230	-80	360	+30		
			240	-90				

S15-26
cont.

**AVERAGE WIND SPEED AND PERCENT PROBABILITY IN A GIVEN DIRECTION
FEBRUARY 2007**

D*	HOUR OF DAY																	
	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	
C	0 50%	0 45%	0 20%	5 30%	0 50%	0 11%	-	-	-	0 11%	0 5%	0 11%	0 42%	0 79%	0 89%	0 58%	0 58%	
90/60	6 25%	6 20%	6 20%	5 30%	5 10%	3 5%	-	-	-	-	-	-	-	-	3 5%	4 16%	4 16%	
60/30	5 20%	4 10%	5 5%	3 10%	14 5%	11 5%	-	-	-	-	-	3 5%	-	-	-	4 16%	4 11%	
30/10	-	3 20%	3 5%	5 10%	-	16 5%	-	-	-	-	-	-	-	-	-	5 5%	3 5%	
0	5 5%	-	6 10%	6 10%	7 15%	-	-	-	-	-	-	-	8 11%	6 16%	7 5%	7 5%	5 11%	
-10/-30	-	-	-	7 5%	-	-	-	-	5 5%	8 5%	3 5%	-	3 5%	-	-	-	-	
-30/-60	-	-	-	-	-	8 21%	7 37%	8 32%	8 42%	10 21%	8 42%	7 42%	3 26%	3 5%	-	-	-	
-60/-90	-	-	-	3 5%	6 20%	6 42%	8 53%	8 68%	8 47%	8 42%	6 32%	5 26%	7 5%	-	-	-	-	
VAR- ABLE	-	3 5%	-	-	5 20%	4 16%	5 5%	-	5 5%	5 21%	5 16%	5 16%	4 11%	-	-	-	-	
AVERAGED HOURLY EXPOSURE INDEX																		
	7.15	7.17	7.60	7.30	5.88	1.81	0.37	0	0.17	1.81	1.04	1.89	5.34	9.02	9.45	7.99	8.22	

**AVERAGE WIND SPEED AND PERCENT PROBABILITY IN A GIVEN DIRECTION
APRIL 2007**

D*	HOUR OF DAY																																	
	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM																	
C	0	41%	0	48%	0	46%	0	36%	0	4%	0	7%	-	-	-	0	3%	0	3%	0	21%	0	21%	0	41%	0	52%							
90/60	5	10%	3	3%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-						
60/30	5	10%	5	7%	3	4%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	3%	-	-	-					
30/10	5	7%	3	3%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	3%	5	3%	-	-				
0	4	10%	5	14%	7	7%	7	4%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	7%	5	17%	5	17%				
-10/-30	-	5	3%	-	9	7%	-	9	7%	-	15	4%	6	4%	-	-	-	-	-	-	14	3%	5	3%	6	7%	7	10%	6	17%	3	3%	4	10%
-30/-60	5	7%	5	3%	5	4%	7	11%	5	18%	9	14%	10	25%	10	17%	9	28%	7	21%	9	14%	9	14%	7	24%	5	24%	5	10%	4	10%	4	7%
-60/-90	3	7%	6	3%	5	29%	7	60%	6	29%	9	68%	9	57%	9	66%	9	62%	8	73%	8	73%	7	69%	7	52%	5	45%	5	24%	5	17%	5	10%
VARIABLE	5	7%	5	14%	5	11%	6	14%	5	18%	7	18%	5	4%	7	10%	6	7%	5	14%	7	10%	5	7%	5	14%	-	5	14%	4	7%	3	3%	
AVERAGED HOURLY EXPOSURE INDEX																																		
	6.5	7.1	5.7	4.3	1.0	1.3	0.1	0.3	0.2	0.8	0.3	0.9	0.8	2.1	3.5	5.9	6.7																	

S15-26
cont.

**AVERAGE WIND SPEED AND PERCENT PROBABILITY IN A GIVEN DIRECTION
AUGUST 2007**

D*	HOUR OF DAY																																	
	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM																	
C	0	77%	0	77%	0	65%	0	13%	-	-	-	-	-	-	0	23%	0	29%	0	58%	0	58%												
90/60	5	3%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-											
60/30	-	5	3%	-	-	-	6	3%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-											
30/10	5	3%	-	5	3%	-	5	3%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-											
0	5	3%	6	6%	-	3	3%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-											
-10/-30	3	3%	-	5	3%	5	3%	-	-	-	6	3%	-	6	3%	6	3%	5	6%	5	6%	5	10%	6	3%									
-30/-60	5	3%	3	3%	-	5	6%	6	23%	7	23%	8	16%	8	16%	7	26%	7	19%	6	26%	5	23%	5	23%	4	23%	7	6%	5	10%			
-60/-90	3	6%	4	10%	5	19%	6	45%	7	54%	8	65%	8	61%	9	65%	8	77%	8	65%	7	65%	7	65%	6	61%	5	45%	4	26%	4	19%	4	23%
VAR- ABLE	-	-	-	4	13%	4	26%	6	23%	7	10%	7	16%	6	19%	7	6%	7	10%	8	13%	5	10%	3	13%	3	6%	4	13%	3	3%	3	3%	
AVERAGED HOURLY EXPOSURE INDEX																																		
	8.3	8.1	6.9	2.6	0.6	0.5	0.6	0.5	0.2	0.3	0.4	0.3	0.4	0.3	0.4	2.5	3.6	6.1	6.1	3.6	6.1													

S15-26
cont.

**AVERAGE WIND SPEED AND PERCENT PROBABILITY IN A GIVEN DIRECTION
OCTOBER 2007**

D*	HOUR OF DAY																	
	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	
C	0 65%	7 13%	7 7%	5 3%	0 57%	0 35%	0 26%	0 13%	0 3%	0 3%	0 3%	0 23%	0 48%	0 52%	0 71%	0 68%	0 68%	
90/60	7 13%	7 7%	5 3%	11 3%	13 7%	18 3%	16 6%	11 6%	15 3%	8 3%	17 3%	13 3%	13 3%	7 6%	8 6%	7 13%	5 3%	
60/30	—	5 16%	10 3%	3 3%	—	18 3%	3 3%	15 6%	15 3%	17 3%	14 3%	13 3%	15 3%	14 3%	3 3%	5 3%	7 7%	
30/10	4 6%	3 3%	3 3%	—	—	5 3%	—	—	—	—	—	—	7 3%	4 6%	—	—	—	
0	7 10%	6 10%	6 14%	7 3%	5 7%	—	—	—	—	7 3%	3 3%	6 6%	—	7 6%	3 3%	—	5 10%	
-10/-30	5 3%	—	—	6 3%	7 3%	—	—	—	—	9 3%	—	9 3%	—	—	3 3%	8 3%	3 3%	
-30/-60	—	—	3 3%	6 16%	6 16%	7 19%	7 26%	7 42%	7 29%	7 23%	9 16%	5 16%	5 26%	6 6%	—	3 3%	3 3%	
-60/-90	—	6 6%	5 13%	5 16%	9 35%	8 55%	8 52%	8 39%	9 42%	8 61%	6 45%	6 32%	3 6%	5 16%	6 13%	4 10%	4 6%	
VARIABLE	5 3%	—	5 3%	4 19%	5 7%	6 3%	6 10%	5 10%	5 16%	5 3%	5 16%	4 13%	6 10%	3 3%	—	—	—	
AVERAGED HOURLY EXPOSURE INDEX																		
	8.1	7.0	7.2	4.8	3.5	1.7	0.8	0.8	1.2	0.3	2.3	3.2	5.4	5.8	7.7	7.3	8.1	

S15-26
cont.

**AVERAGE WIND SPEED AND PERCENT PROBABILITY IN A GIVEN DIRECTION
DECEMBER 2007**

D*	HOUR OF DAY																
	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM
C	0 32%	0 43%	0 36%	0 61%	0 54%	0 36%	0 21%	0 3%	-	0 3%	0 17%	0 63%	0 70%	0 80%	0 70%	0 53%	0 47%
90/60	5 39%	4 36%	5 21%	5 14%	-	-	-	-	-	-	-	-	5 3%	4 7%	3 3%	4 23%	5 23%
60/30	4 18%	5 14%	4 36%	5 14%	8 7%	9 7%	8 4%	15 3%	10 3%	-	-	3 3%	-	-	3 13%	4 10%	4 13%
30/10	5 7%	3 4%	3 4%	3 4%	6 14%	-	8 7%	7 7%	-	5 3%	7 3%	-	-	-	3 3%	-	3 3%
0	3 4%	3 4%	-	-	5 14%	5 11%	7 4%	-	6 3%	6 7%	3 3%	7 3%	5 7%	3 3%	-	5 10%	7 3%
-10/-30	-	-	-	-	-	3 4%	9 4%	-	-	-	-	4 10%	-	-	6 7%	-	9 3%
-30/-60	-	-	-	-	-	5 7%	6 21%	7 20%	7 43%	6 37%	6 33%	4 10%	4 7%	3 7%	-	-	5 3%
-60/-90	-	-	-	-	3 4%	6 21%	7 29%	7 57%	8 47%	7 47%	7 30%	4 10%	3 7%	7 3%	5 7%	3 3%	-
VARL- ABLE	-	-	3 4%	3 7%	6 7%	4 14%	5 11%	5 10%	5 3%	5 3%	5 13%	-	6 7%	-	-	-	3 3%
AVERAGED HOURLY EXPOSURE INDEX																	
	6.2	7.0	6.7	7.9	7.8	5.2	3.3	1.2	0.4	1.1	2.6	6.7	7.9	8.5	8.0	7.5	6.6

4. Interpretation of Hourly Wind Information:

In order to relate the hourly wind probabilities to a wind-related risk factor, a scale factor between 0 and 10 was chosen for each specific condition.

These risk factors are tabulated on Page 17A as "Wind-Related Exposure Index to Particulates."

The calm periods were recognized as the most severe and dangerous condition and were assigned an exposure index of 10.

As explained earlier, under calm conditions the long-lived ultrafine PM₁ diesel exhaust particulates just keep accumulating in a slowly expanding cloud along the freeway that extends well beyond the 500 ft line in lateral extent. The longer the calm period lasts, the dirtier the pollution cloud becomes. When compared with the PM₁ exposure produced on the site by a 15mph downwind at 90° to I-5, an hour-long calm can easily produce a five times higher PM₁ concentration. Longer calm periods may produce 10 to 50 times higher concentrations.

For crosswinds, the particle concentrations disperse more quickly with distance as the wind speed increases, because of the higher turbulence produced by stronger winds. Higher speeds also stretch out the particle concentration in the wind direction (inversely proportional to wind speed). The exposure index for downwind crosswinds therefore decreases with higher wind speeds.

For winds blowing in either direction (NW or SE) along the I-5, the exposure index on the site will also be very high, because all the pollution along miles of freeway will pass along the I-5 corridor. In the "sra- model" the source volume length would need to be extended from 50 m to thousands of meters.

For crosswinds blowing away from the site, the exposure index was chosen to be 0 at all speeds.

For variable winds, the exposure index was averaged over all wind directions.

One may quarrel over the exact numbers assigned as exposure indices to the varying wind conditions, but the basic conclusions reached from this analysis will not change.

The hourly exposure indices were averaged over the month and are given at the bottom of the Tables on the previous pages.

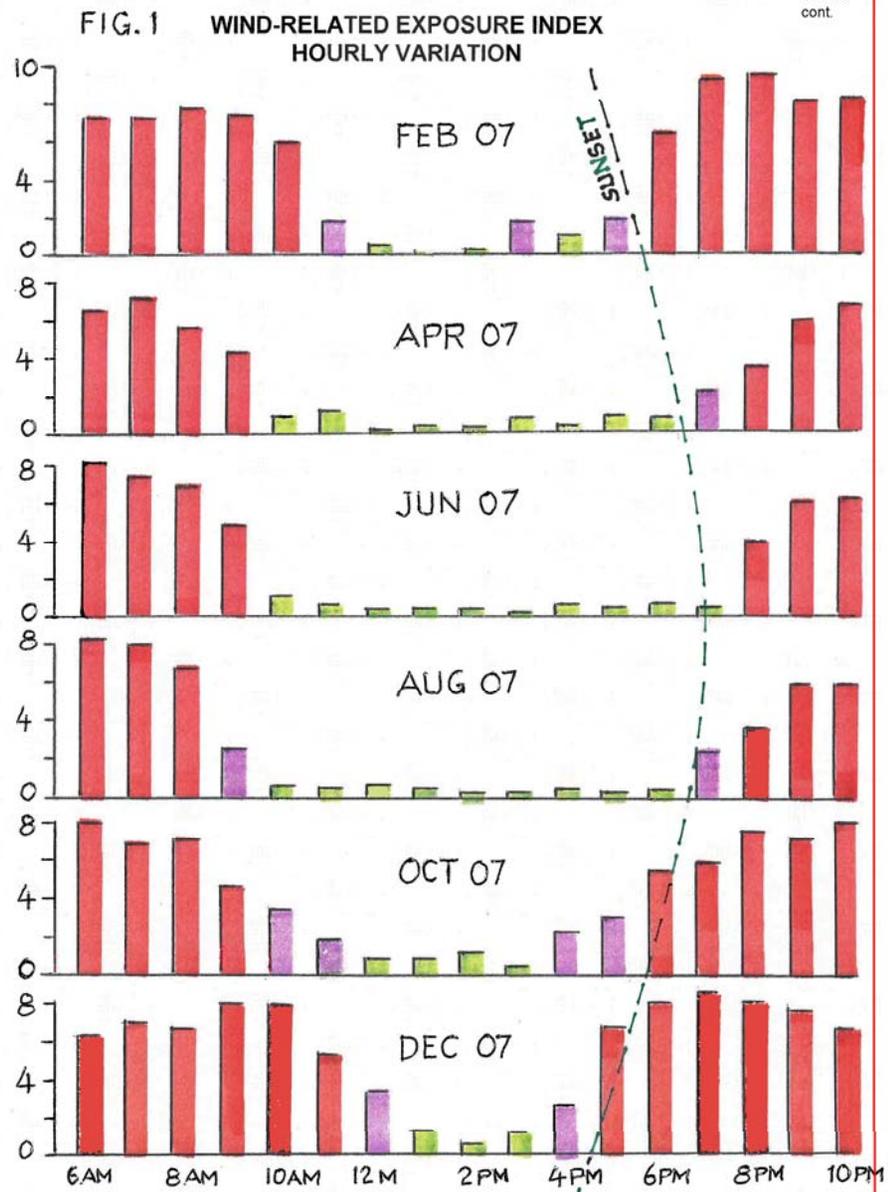
These "Hourly Variations of the Wind-Related Exposure Index" are plotted in Fig. 1 on the Page 17B for six months, representative of the yearly seasons.

Exposure indices from 3.5 to 10  are Dangerously Severe
Exposure indices from 1.5 to 3.5  are Moderately High
Exposure indices from 0.2 to 1.5  show Elevated Risk

S15-26
cont.

WIND-RELATED EXPOSURE INDEX TO PARTICULATES (ON A SCALE OF 1 TO 10)

WIND DIRECTION D*	CALM	0 - 5 MPH	6 - 10 MPH	11 - 15 MPH
CALM	10	—	—	—
+90° to +60°	—	4	3	2
+60° to +30°	—	5	4	3
+30° to +10°	—	7	6	5
0°	—	8	7	6
-10° to -30°	—	0	0	0
-30° to -60°	—	0	0	0
-60° to -90°	—	0	0	0
VARIABLE	—	3.4	2.8	2.3



CONCLUSIONS

1. Wind-related exposure indices for diesel emissions and other vehicle exhaust on the proposed sports site are highly unfavorable during morning and evening hours throughout the year. Heavy $PM_{2.5}$ and PM_1 particulate concentrations are predicted on the proposed sports fields during these morning hours and evenings after sunset. These periods are deemed highly unsafe conditions for children playing on these fields anywhere on the Hall site.
2. Pollution levels during morning and evening hours will be aggravated by heavy truck traffic generally seen at morning and evening rush hours.
3. Relatively safe times for strenuous sports near I-5 are only between 12 noon and 4 pm during winter, early spring and late fall. At mid-summer, the periods of little to moderate pollution are somewhat wider, from 10 am to 6 pm.
4. All periods after sunset are unsafe for team play on the fields. Lighting of fields is thus not needed, since use of the field should be restricted to daylight hours.
5. Legislation should be introduced that would prohibit locating sports fields near busy freeways, just as schools can no longer be built within 500 ft of busy roadways. Lungs of a child playing soccer near a busy freeway for one hour can be exposed to a dose of particulate matter that is equivalent to spending the whole week in a classroom of a school near the same freeway.
6. The proposed sports complex on the Hall site should be abandoned in favor of a true community park with a few playing fields for daylight use only. Park should not be open for use before 9 am in the summer, nor before 11 am during winter months. Such lighter use of a community park would also alleviate most of the other impacts on neighbors and traffic, and would alleviate demands for better vehicle access to the site.
7. Actual $PM_{2.5}$ and PM_1 particulate concentrations should be monitored by suitably placed detectors on the site during all hours of the year. Such sensors must provide pollution levels on an hourly basis (not just accumulated daily values). No decisions regarding sports fields on the site should be made before such $PM_{2.5}$ and PM_1 pollution data has been acquired for a full year.

S15-26
cont.

S15-26 (continued)

1. The wind exposure indices were created by the commentor. These indices are not tools suggested, reviewed or approved by any regulatory or health effects agency. The adjectives "highly unfavorable," "heavy," and "highly unsafe" are the opinions of the commentor, and are not based on substantial evidence or approved scientific methods, nor are they related to established standards. No conclusion relative to significance of impact may be determined from this information.
2. The commentor is correct in inferring that pollutant emission rates would be greater with increased truck traffic. No evidence is presented that heavier diesel truck traffic would occur during morning and evening rush hours.
3. The commentor's description of relatively safe and unsafe times for park use are based upon commentor's submitted analysis. The analysis is based on questionable meteorological data, as discussed in responses #S15-3 and #S15-5, and is not based on substantial evidence or approved scientific methods. The terms safe and unsafe are not related to established standards. No conclusion relative to significance of impact may be determined from this information.
4. The statement that all periods after sunset area unsafe for play on the fields is not supported by substantial evidence. See responses 1 and 3 above.
5. The introduction of legislation is not relevant to this EIR. The comment that schools can no longer be built within 500 feet of busy roadways is incorrect; please see response to comment #S15-16. The statement purporting equivalence of one hour of soccer near a busy freeway to one week in a classroom at the same location is not supported by substantial evidence. For example, please see the response to comment #S15-13, relative to commentor's claim relative to athlete's breathing rates.
6. Chapter 7 includes multiple alternatives that analyze less intense park use. These alternatives include the Reduced Intensity Alternative and the Citizens for Quality of Life Alternative which reduce the number of athletic fields, provide more passive areas, and reduce or eliminate other park features. The No Athletic Field Lighting Alternative eliminates the lighting of the athletic fields which would reduce the hours of operation of the outdoor park facilities.
7. The City does not consider particulate monitoring to be necessary to either the determination of potential significant impact or the protection of park user's health. The analytical methods used in the preparation of both the Air Toxics Risk Evaluation and the Children's Health Study are considered appropriate to provide adequate information regarding potential health risks and support the finding of less than significant.

APPENDIX

Sample Hourly Climatological Data for October 2007
and Assignment to Wind Direction Categories (D*)

OCT 07

U.S. Department of Commerce
National Oceanic & Atmospheric Administration

QUALITY CONTROLLED LOCAL
CLIMATOLOGICAL DATA
(final)
HOURLY OBSERVATIONS TABLE
MCCLELLAN-PALOMAR AIRPORT (031777)
CARLSBAD, CA
(10/2007)

National Climatic Data Center
Federal Building
151 Patton Avenue
Asheville, North Carolina 28801

Elevation: 310 ft. above sea level
Latitude: 33.128
Longitude: -117.279
Data Version: VER2

Date	Time (LST)	Station Type	Sky Conditions	Visibility (SM)	Weather Type	Dry Bulb Temp (F)	Wet Bulb Temp (F)	Dew Point Temp (F)	Rel Humid %	Wind Speed (MPH)	Wind Dir	Wind Gasts (MPH)	Station Pressure (in. hg)	Press Terc (in. hg)	Net Air Chg (mb)	Sea Level Pressure (in. hg)	Report Type	Precip Total (in)	Alt-meter (in. hg)
01	0053	12	4	5	6	63	51	59	12	0	000	0	29.67	3	005	30.01	AA	22	23
01	0153	12	CLR	10.00		64	17.8	62	16.4	60	15.6	87	0	000	29.67	30.01	AA	30.02	30.02
01	0253	12	CLR	9.00		65	18.0	65	16.6	84	0	000	29.66	8	006	30.00	AA	30.01	30.01
01	0353	12	CLR	9.00		63	17.2	60	15.6	89	0	000	29.65	8	006	30.00	AA	30.00	30.00
01	0453	12	CLR	8.00		64	17.8	61	16.1	89	0	000	29.66	3	010	30.00	AA	30.01	30.01
01	0553	12	CLR	6.00	HZ	63	17.2	60	15.6	88	0	000	29.66	3	010	30.02	AA	30.03	30.03
01	0653	12	CLR	5.00	HZ	65	18.3	61	16.0	88	0	000	29.67	3	010	30.03	AA	30.04	30.04
01	0753	12	CLR	5.00		66	18.6	62	16.3	86	0	000	29.67	3	010	30.03	AA	30.04	30.04
01	0853	12	CLR	10.00		69	20.6	62	18.9	89	14.4	88	6	230	29.70	30.05	AA	30.05	30.05
01	0953	12	CLR	10.00		71	21.7	63	17.0	87	13.9	61	0	000	29.70	30.04	AA	30.05	30.05
01	1053	12	CLR	10.00		72	22.2	65	18.1	80	15.6	68	11	250	29.69	30.03	AA	30.04	30.04
01	1153	12	CLR	10.00		71	21.7	64	17.6	89	15.0	89	8	250	29.68	30.04	AA	30.04	30.04
01	1253	12	CLR	10.00		71	21.7	64	17.6	89	15.0	89	9	260	29.68	30.04	AA	30.04	30.04
01	1353	12	CLR	10.00		74	23.3	62	16.5	83	11.7	48	5	V/R	29.64	29.98	AA	29.98	29.98
01	1453	12	CLR	10.00		72	22.2	61	16.3	84	12.2	53	7	V/R	29.63	29.98	AA	29.98	29.98
01	1553	12	CLR	10.00		74	23.3	62	16.5	83	11.7	48	5	V/R	29.63	29.98	AA	29.98	29.98
01	1653	12	CLR	10.00		67	19.4	62	16.4	89	14.4	73	3	230	29.63	29.98	AA	29.98	29.98
01	1753	12	CLR	10.00		66	18.9	62	16.5	89	15.0	78	0	000	29.64	29.98	AA	29.98	29.98
01	1853	12	CLR	10.00		65	18.3	61	16.3	89	15.0	81	0	000	29.65	29.98	AA	29.98	29.98
01	1953	12	CLR	10.00		67	19.4	62	16.4	89	14.4	73	3	230	29.65	29.98	AA	29.98	29.98
01	2053	12	CLR	10.00		64	17.8	61	16.1	89	15.0	84	0	000	29.65	29.98	AA	29.98	29.98
01	2153	12	CLR	7.00		63	17.2	61	15.9	89	15.0	87	0	000	29.67	30.01	AA	30.02	30.02
01	2253	12	CLR	6.00	BR	62	16.7	60	15.6	89	15.0	80	0	000	29.67	30.01	AA	30.02	30.02
01	2353	12	CLR	6.00	BR	61	16.1	58	14.8	87	13.9	87	0	000	29.66	30.01	AA	30.01	30.01
02	0053	12	CLR	7.00		60	15.6	57	13.9	88	14.4	84	0	000	29.66	30.00	AA	30.01	30.01
02	0153	12	CLR	6.00	BR	60	15.6	57	13.9	85	12.8	84	0	000	29.64	29.99	AA	30.01	30.01
02	0253	12	CLR	6.00	BR	59	15.0	57	13.7	85	12.8	87	0	000	29.65	29.99	AA	30.00	30.00
02	0353	12	CLR	7.00		59	15.0	56	13.4	84	12.2	84	0	000	29.65	29.99	AA	30.00	30.00
02	0453	12	CLR	6.00	HZ	64	17.8	57	15.6	85	13.3	71	0	000	29.65	29.99	AA	30.01	30.01
02	0553	12	CLR	6.00		64	17.8	57	15.6	85	13.3	71	0	000	29.65	29.99	AA	30.01	30.01
02	0653	12	CLR	8.00		69	20.6	61	16.0	85	13.3	61	0	000	29.67	30.02	AA	30.02	30.02
02	0753	12	CLR	10.00		72	22.2	63	16.9	86	13.3	57	0	000	29.67	30.02	AA	30.02	30.02
02	0853	12	CLR	10.00		74	23.3	62	16.8	84	12.2	50	7	240	29.67	30.01	AA	30.02	30.02
02	0953	12	CLR	10.00		74	23.3	64	17.9	89	14.4	58	7	260	29.67	30.01	AA	30.02	30.02
02	1053	12	CLR	10.00		74	23.3	64	17.9	89	14.4	58	7	260	29.67	30.01	AA	30.02	30.02
02	1153	12	CLR	10.00		73	22.8	64	17.7	88	14.4	59	8	260	29.62	29.96	AA	29.97	29.97
02	1253	12	CLR	10.00		74	23.3	64	17.9	89	14.4	59	8	260	29.62	29.96	AA	29.97	29.97
02	1353	12	CLR	10.00		72	22.2	62	16.5	85	12.2	55	7	250	29.61	29.95	AA	29.96	29.96
02	1453	12	CLR	10.00		72	22.2	62	16.5	85	12.2	55	7	250	29.60	29.94	AA	29.95	29.95
02	1553	12	CLR	10.00		69	20.6	61	16.1	84	12.2	55	0	000	29.59	29.93	AA	29.94	29.94
02	1653	12	CLR	10.00		69	20.6	61	16.0	85	12.8	61	0	000	29.60	29.94	AA	29.95	29.95
02	1753	12	CLR	10.00		69	20.6	62	16.3	87	13.9	88	0	000	29.62	29.96	AA	29.97	29.97
02	1853	12	CLR	10.00		65	18.9	62	16.8	80	15.6	81	0	000	29.63	29.97	AA	29.97	29.97
02	1953	12	CLR	9.00		65	18.9	62	16.8	80	15.6	84	0	000	29.63	29.97	AA	29.97	29.97

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02	2353	12	CLR	9.00	63	17.2	60	14.6	58	14.4	84	0	000	29.57	AA	29.88	
03	0353	12	CLR	10.00	62	16.7	59	14.7	56	13.3	81	5	000	29.87	AA	29.86	
03	0153	12	CLR	10.00	63	17.2	58	14.3	54	12.2	75	0	000	29.93	AA	29.95	
03	0353	12	CLR	10.00	62	16.7	57	14.1	54	12.2	75	0	000	29.92	AA	29.92	
03	0353	12	CLR	10.00	59	15.0	56	13.1	53	11.7	81	0	000	29.91	AA	29.91	
03	0353	12	CLR	9.00	61	16.1	57	13.9	54	11.2	78	0	000	29.92	AA	29.93	
03	0353	12	SCT100	9.00	65	18.3	59	14.8	54	12.2	68	0	000	29.93	AA	29.94	
03	0353	12	CLR	10.00	72	22.2	63	18.5	56	13.3	57	0	000	29.94	AA	29.95	
03	0353	12	CLR	10.00	74	23.3	64	17.6	57	13.9	56	6	280	29.93	AA	29.94	
03	0353	12	CLR	10.00	73	22.8	62	16.8	56	12.8	53	9	250	29.94	AA	29.94	
03	0353	12	CLR	10.00	73	22.8	65	19.1	56	14.4	55	6	270	29.92	AA	29.92	
03	0353	12	FEW010	10.00	73	22.8	63	17.4	57	13.9	57	5	270	29.88	AA	29.90	
03	0353	12	CLR	10.00	73	22.8	63	17.4	57	13.9	57	5	270	29.88	AA	29.88	
03	0353	12	CLR	10.00	71	21.7	62	16.4	55	12.8	57	5	250	29.87	AA	29.87	
03	0353	12	CLR	10.00	71	21.7	62	16.5	56	13.3	55	6	270	29.86	AA	29.86	
03	0353	12	CLR	10.00	69	20.3	62	16.5	57	13.3	61	5	250	29.87	AA	29.87	
03	0353	12	CLR	10.00	69	20.3	63	17.0	59	15.0	73	0	000	29.86	AA	29.86	
03	0353	12	CLR	10.00	67	18.4	63	17.1	60	15.6	74	0	000	29.87	AA	29.88	
03	0353	12	CLR	10.00	65	16.3	62	16.6	60	15.6	84	0	000	29.87	AA	29.87	
03	0353	12	CLR	10.00	63	17.2	61	15.9	59	15.0	87	0	000	29.86	AA	29.87	
03	0353	12	CLR	6.00	63	17.2	61	15.9	59	15.0	87	0	000	29.86	AA	29.87	
03	0353	12	CLR	6.00	63	17.2	60	15.2	57	13.9	81	7	160	29.82	SP	29.87	
03	0353	12	FEW001	1.25	BR	64	17.8	59	15.2	59	13.3	75	6	160	29.85	AA	29.85
03	0353	12	WV001	0.256	H26	64	18.0	61	16.1	59	15.0	84	3	160	29.87	AA	29.87
03	0353	12	WV001	0.256	H26	62	16.7	61	16.3	61	16.1	97	3	140	29.85	AA	29.85
03	0353	12	WV001	0.256	FG	62	16.7	61	16.3	61	16.1	97	3	140	29.85	AA	29.85
04	0138	12	OVC001	1.00	BR	63	17.0	62	16.5	61	16.0	93	0	000	29.84	SP	29.87
04	0138	12	OVC001	1.00	BR	63	17.0	62	16.5	61	16.0	93	0	000	29.84	SP	29.87
04	0151	12	SCT001 OVC008	2.50	BR	63	17.0	62	16.5	61	16.0	93	0	000	29.84	SP	29.87
04	0253	12	OVC010	7.00	BR	63	17.0	61	15.9	59	15.0	87	6	130	29.84	AA	29.84
04	0316	12	FEW010	8.00	BR	63	17.0	60	15.2	57	14.0	81	3	130	29.84	AA	29.84
04	0353	12	BKN010	8.00	BR	63	17.0	60	15.2	57	14.0	81	3	130	29.84	AA	29.84
04	0453	12	OVC010	7.00	BR	63	17.2	60	15.2	57	13.9	81	6	120	29.80	AA	29.83
04	0553	12	OVC012	8.00	BR	63	17.2	60	15.2	57	13.9	81	7	160	29.80	AA	29.83
04	0653	12	OVC012	8.00	BR	64	17.8	59	15.2	59	13.3	75	6	160	29.85	AA	29.85
04	0753	12	OVC018	8.00	BR	65	19.3	69	15.2	59	13.3	73	5	160	29.87	AA	29.87
04	0853	12	BKN018	8.00	BR	65	19.3	69	15.2	59	13.3	73	5	160	29.86	AA	29.86
04	0953	12	FEW020	9.00	BR	67	19.4	61	15.8	56	13.3	68	7	210	29.82	AA	29.87
04	0953	12	FEW020	9.00	BR	68	20.0	60	15.8	55	13.0	63	10	220	29.82	AA	29.86
04	1153	12	CLR	10.00	67	18.4	61	15.8	56	13.3	68	10	220	29.81	AA	29.86	
04	1253	12	CLR	10.00	69	20.6	61	16.3	56	13.3	63	10	200	29.80	AA	29.82	
04	1353	12	CLR	10.00	69	20.6	61	16.3	56	13.3	63	13	210	29.80	AA	29.81	
04	1453	12	CLR	10.00	69	20.0	61	16.0	56	13.3	66	11	210	29.80	AA	29.81	
04	1503	12	BKN017	8.00	BR	66	19.0	60	15.3	55	13.0	68	11	200	29.82	AA	29.82
04	1513	12	SCT017	8.00	BR	66	19.0	60	15.3	55	13.0	68	11	200	29.82	AA	29.82
04	1522	12	BKN017	8.00	BR	66	19.0	60	15.3	55	13.0	68	14	200	29.82	AA	29.82
04	1551	12	SCT019	8.00	BR	66	19.0	60	15.3	55	13.0	68	14	190	29.82	AA	29.82
04	1651	12	BKN020	8.00	BR	66	19.0	60	15.3	55	13.0	68	14	190	29.82	AA	29.82
04	1653	12	BKN020	8.00	BR	66	19.0	60	15.3	55	13.0	68	14	190	29.82	AA	29.82
04	1753	12	OVC018	8.00	BR	65	18.3	59	15.1	55	12.8	70	9	180	29.81	AA	29.81
04	1853	12	OVC020	10.00	BR	64	17.8	59	14.9	55	12.8	73	8	180	29.82	AA	29.82
04	2053	12	FEW019 OVC028	10.00	BR	64	17.8	59	14.9	55	12.8	73	8	180	29.82	AA	29.82
04	2105	12	FEW019 OVC030	10.00	BR	64	19.0	59	14.9	55	13.0	73	6	190	29.84	AA	29.84
04	2253	12	OVC036	10.00	BR	64	17.8	59	14.6	55	12.2	72	6	180	29.82	AA	29.82
04	2353	12	BKN038	10.00	BR	64	17.8	57	14.0	52	11.1	65	6	160	29.85	AA	29.85
04	0853	12	FEW040	10.00	BR	63	17.2	57	13.8	52	11.1	68	5	160	29.84	AA	29.84
05	0745	12	FEW019 BKN024 OVC038	10.00	BR	63	17.0	57	13.8	52	11.0	68	5	140	29.83	SP	29.83

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05	0653	12	BKN025 OVC055	10,00	65	16.7	56	14.5	55	11.1	70	5	140	29.48	AA	29.83
05	0215	12	SCT022 BKN037	10,00	63	17.0	57	14.3	54	12.0	73	3	190	29.49	AA	29.84
05	0253	12	SCT035	10,00	62	16.7	57	13.8	53	11.7	73	3	190	29.50	AA	29.85
05	0453	12	FEW025 BKN047	10,00	62	16.7	56	13.5	52	11.1	70	6	180	29.51	AA	29.86
05	0630	12	FEW030	9,00	61	16.0	57	13.9	54	12.0	78	3	150	29.52	SP	29.87
05	0830	12	BKN025 BKN029 OVC047	10,00	62	16.7	56	13.5	52	11.1	70	8	220	29.53	AA	29.88
05	0751	12	SCT029 BKN039	10,00	63	17.0	56	13.2	50	10.0	63	10	230	29.55	AA	29.90
05	0853	12	SCT029 BKN039	10,00	63	17.2	56	13.2	50	10.0	63	13	230	29.55	AA	29.90
05	0953	12	SCT027 BKN039	10,00	63	17.2	56	13.2	50	10.0	63	11	220	29.57	AA	29.92
05	0902	12	BKN027 BKN037 BKN048	10,00	64	18.0	57	14.0	52	11.0	65	11	270	29.57	AA	29.93
05	0848	12	SCT029 SCT038	10,00	64	18.0	55	12.9	48	9.0	56	10	290	29.58	AA	29.94
05	0853	12	FEW029	10,00	65	18.3	56	13.2	48	8.9	54	11	270	29.59	AA	29.95
05	1153	12	FEW036	10,00	65	18.3	56	13.2	48	7.8	50	9	260	29.60	AA	29.96
05	1253	12	SCT032 BKN042	10,00	65	18.3	56	13.2	48	7.8	50	6	VR	29.61	AA	29.97
05	1453	12	FEW034	10,00	65	18.3	55	12.9	47	8.3	52	8	270	29.62	AA	29.98
05	1653	12	SCT035	10,00	64	17.8	54	12.4	46	7.8	52	9	300	29.63	AA	29.99
05	1753	12	FEW035	10,00	63	17.2	54	12.4	47	8.3	58	8	260	29.64	AA	29.99
05	1853	12	BKN031	10,00	61	16.1	53	11.4	45	7.2	54	6	280	29.65	AA	29.98
05	1953	12	BKN038	10,00	62	16.7	53	11.7	46	7.2	56	6	280	29.66	AA	29.98
05	2053	12	BKN031	10,00	59	15.1	53	11.7	47	6.8	65	7	110	29.64	AA	29.96
05	2153	12	FEW045	10,00	60	15.1	53	11.7	47	6.8	65	3	900	29.61	AA	29.96
05	0453	12	CLR	10,00	57	13.9	51	10.7	46	7.8	67	5	110	29.64	AA	29.98
06	0653	12	CLR	10,00	55	12.8	50	9.9	45	7.2	69	5	070	29.69	AA	30.04
06	0853	12	CLR	10,00	59	14.4	52	11.0	48	7.8	65	5	100	29.70	AA	30.05
06	1053	12	CLR	10,00	58	14.4	52	11.2	47	8.3	67	5	160	29.64	AA	29.98
06	1253	12	CLR	10,00	59	14.4	52	10.5	46	7.8	65	7	120	29.64	AA	29.98
06	0153	12	SCT031	10,00	58	14.0	51	10.6	46	8.0	65	7	120	29.64	AA	29.98
06	0251	12	BKN031	10,00	57	14.0	51	10.7	46	8.0	67	6	110	29.64	SP	29.99
06	0353	12	BKN031	10,00	57	14.0	51	10.7	46	8.0	67	6	110	29.64	SP	29.99
06	0453	12	BKN033	10,00	57	13.9	51	10.7	46	7.8	67	5	110	29.64	AA	29.98
06	0653	12	CLR	10,00	55	12.8	50	9.9	45	7.2	69	5	070	29.69	AA	30.00
06	0853	12	CLR	10,00	59	14.4	52	11.0	48	7.8	65	5	100	29.70	AA	30.03
06	1053	12	CLR	10,00	58	14.4	52	10.5	46	7.8	65	7	120	29.64	AA	30.05
06	1253	12	CLR	10,00	63	17.2	54	12.2	48	7.8	64	7	VR	29.72	AA	30.07
06	0153	12	CLR	10,00	64	17.8	55	12.7	47	8.3	64	7	VR	29.72	AA	30.07
06	0253	12	CLR	10,00	65	18.3	55	12.9	47	8.3	62	9	250	29.70	AA	30.05
06	0353	12	CLR	10,00	67	19.9	56	13.1	46	10.0	65	7	290	29.69	AA	30.03
06	0453	12	CLR	10,00	69	20.6	57	14.1	48	8.9	47	6	VR	29.69	AA	30.02
06	0653	12	CLR	10,00	68	20.0	58	14.4	50	10.0	63	8	280	29.64	AA	29.98
06	0853	12	CLR	10,00	68	20.0	57	13.6	47	8.3	47	8	290	29.63	AA	29.98
06	1053	12	CLR	10,00	84	17.8	56	13.2	48	9.4	58	6	000	29.63	AA	29.97
06	1253	12	CLR	10,00	63	17.2	56	13.2	50	10.0	63	0	000	29.64	AA	29.97
06	0153	12	CLR	10,00	62	15.7	55	12.7	48	9.4	63	0	000	29.65	AA	29.99
06	0353	12	CLR	10,00	60	15.6	55	11.7	45	7.2	68	6	000	29.64	AA	29.99
06	0453	12	CLR	10,00	62	15.7	49	9.5	35	1.7	37	5	050	29.63	AA	29.98
06	0653	12	CLR	10,00	60	15.6	47	8.5	33	0.6	36	0	000	29.63	AA	29.97
06	0853	12	CLR	10,00	59	14.4	46	7.8	32	0.0	37	0	000	29.63	AA	29.97
06	1053	12	CLR	10,00	57	13.9	44	6.6	27	-2.8	32	0	000	29.63	AA	29.97
06	1253	12	CLR	10,00	56	13.3	43	6.2	26	-3.3	32	3	050	29.63	AA	29.98
07	0453	12	CLR	10,00	57	13.9	43	6.3	25	-3.9	29	0	000	29.65	AA	29.97
07	0653	12	CLR	10,00	60	15.6	48	5.4	21	-5.8	28	0	000	29.65	AA	30.00
07	0853	12	CLR	10,00	69	20.6	48	9.5	25	-3.9	19	0	000	29.67	AA	30.02
07	1053	12	CLR	10,00	74	23.3	51	10.5	23	-5.0	15	0	000	29.69	AA	30.04
07	1253	12	CLR	10,00	78	25.6	51	10.6	18	-8.9	9	0	000	29.67	AA	30.03
07	0153	12	CLR	10,00	84	26.9	54	12.2	17	-9.3	8	6	VR	29.63	AA	29.97
07	1153	12	CLR	10,00	84	26.9	54	12.0	15	-9.4	7	5	280	29.60	AA	29.94
07	1253	12	CLR	10,00	78	25.6	50	11.6	24	-4.4	13	11	270	29.58	AA	29.95

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07	1453	12	CLR	10.00	75	23.9	M	M	M	M	M	6	29.57	29.57	29.51	AA	29.52
07	1553	12	CLR	10.00	76	24.4	53	11.4	26	-3.3	16	3	29.57	29.57	29.51	AA	29.52
07	1653	12	BKN200	10.00	73	22.8	55	12.5	37	2.8	27	3	29.57	29.57	29.51	AA	29.52
07	1653	12	CT200	10.00	71	21.7	54	12.1	37	2.8	28	6	29.58	29.58	29.51	AA	29.52
07	1553	12	CLR	10.00	68	20.0	53	11.5	38	3.3	33	0	29.58	29.58	29.51	AA	29.52
07	2053	12	CLR	10.00	65	18.3	55	12.9	47	8.3	52	0	29.59	29.59	29.53	AA	29.54
07	2153	12	CLR	10.00	62	16.7	53	11.4	44	6.7	52	0	29.59	29.59	29.53	AA	29.54
07	2253	12	CLR	10.00	60	15.6	52	10.9	44	6.7	56	0	29.59	29.59	29.53	AA	29.54
07	2353	12	CLR	10.00	57	14.0	50	10.4	42	6.2	56	0	29.57	29.57	29.51	AA	29.52
08	0053	12	CLR	10.00	62	16.7	46	7.3	24	-4.4	23	3	29.57	29.57	29.51	AA	29.52
08	0153	12	CLR	10.00	60	15.6	45	7.0	24	-4.4	25	3	29.55	29.55	29.49	AA	29.50
08	0253	12	CLR	10.00	62	16.7	45	7.4	23	-5.0	22	5	29.53	29.53	29.48	AA	29.49
08	0353	12	CLR	10.00	59	15.0	44	6.4	22	-5.6	24	0	29.53	29.53	29.47	AA	29.48
08	0453	12	CLR	10.00	57	13.9	43	5.9	21	-6.0	26	0	29.54	29.54	29.48	AA	29.49
08	0553	12	CLR	10.00	61	16.1	47	8.4	31	-6.6	32	0	29.56	29.56	29.50	AA	29.51
08	0653	12	CLR	10.00	62	16.7	45	7.4	23	-5.0	22	5	29.55	29.55	29.49	AA	29.50
08	0753	12	CLR	10.00	70	21.1	49	9.5	23	-5.0	17	0	29.55	29.55	29.49	AA	29.50
08	0853	12	CLR	10.00	78	26.6	54	12.4	30	-1.1	17	0	29.55	29.55	29.49	AA	29.50
08	0953	12	FEW250	10.00	79	26.6	54	12.4	30	-1.1	17	7	29.54	29.54	29.48	AA	29.49
08	1053	12	CLR	10.00	78	25.6	54	12.4	30	-1.1	17	0	29.54	29.54	29.48	AA	29.49
08	1153	12	CLR	10.00	76	24.4	53	11.3	26	-3.3	16	6	29.52	29.52	29.46	AA	29.47
08	1253	12	CLR	10.00	77	25.0	52	11.2	23	-5.0	13	6	29.50	29.50	29.44	AA	29.45
08	1353	12	CLR	10.00	74	23.3	50	10.7	21	-5.6	15	9	29.48	29.48	29.42	AA	29.43
08	1453	12	CLR	10.00	78	26.6	55	12.6	34	-1.1	21	3	29.49	29.49	29.43	AA	29.44
08	1553	12	CLR	10.00	74	23.3	52	10.9	26	-3.3	17	3	29.51	29.51	29.45	AA	29.46
08	1653	12	CLR	10.00	72	22.2	51	10.2	25	-3.9	17	0	29.53	29.53	29.47	AA	29.48
08	1753	12	CLR	10.00	65	18.3	49	8.5	31	-6.6	28	0	29.55	29.55	29.49	AA	29.50
08	2053	12	CLR	10.00	64	17.8	48	8.8	29	-1.7	27	0	29.56	29.56	29.50	AA	29.51
08	2153	12	CLR	10.00	61	16.1	47	8.4	31	-6.6	32	0	29.56	29.56	29.50	AA	29.51
08	2253	12	CLR	10.00	59	15.0	45	7.0	26	-3.3	28	0	29.55	29.55	29.49	AA	29.50
08	2353	12	CLR	10.00	60	15.6	45	7.3	26	-3.3	27	0	29.55	29.55	29.49	AA	29.50
09	0053	12	CLR	10.00	60	15.6	45	7.3	26	-3.3	27	3	29.55	29.55	29.49	AA	29.50
09	0153	12	CLR	10.00	58	14.4	44	6.6	25	-3.9	28	0	29.54	29.54	29.48	AA	29.49
09	0253	12	CLR	10.00	57	13.4	43	5.9	27	-2.8	31	0	29.54	29.54	29.48	AA	29.49
09	0353	12	CLR	10.00	56	12.3	42	5.2	26	-3.3	32	3	29.56	29.56	29.50	AA	29.51
09	0453	12	CLR	10.00	55	11.3	41	4.5	25	-3.3	32	3	29.56	29.56	29.50	AA	29.51
09	0553	12	CLR	10.00	56	12.3	43	5.2	26	-3.3	32	3	29.57	29.57	29.51	AA	29.52
09	0653	12	CLR	10.00	61	16.1	47	8.2	30	-1.1	31	3	29.60	29.60	29.54	AA	29.55
09	0753	12	CLR	10.00	61	16.1	47	8.2	30	-1.1	31	3	29.60	29.60	29.54	AA	29.55
09	0853	12	CLR	10.00	69	20.0	57	13.6	45	7.2	41	6	29.61	29.61	29.55	AA	29.56
09	0953	12	CLR	10.00	70	21.1	57	13.6	45	7.2	41	6	29.62	29.62	29.56	AA	29.57
09	1053	12	CLR	10.00	67	19.4	59	15.0	53	11.7	61	7	29.60	29.60	29.54	AA	29.55
09	1153	12	CLR	10.00	67	19.4	59	15.0	53	11.7	61	7	29.60	29.60	29.54	AA	29.55
09	1253	12	CLR	10.00	69	20.6	60	15.7	54	12.2	59	5	29.61	29.61	29.55	AA	29.56
09	1353	12	CLR	10.00	69	20.6	60	15.4	53	11.7	57	7	29.60	29.60	29.54	AA	29.55
09	1453	12	CLR	10.00	69	20.6	61	16.3	56	13.3	63	7	29.60	29.60	29.54	AA	29.55
09	1553	12	CLR	10.00	66	18.9	61	15.9	57	13.9	73	5	29.60	29.60	29.54	AA	29.55
09	1653	12	CLR	10.00	63	17.0	60	15.2	57	14.0	81	0	29.60	29.60	29.54	AA	29.55
09	1753	12	CLR	10.00	63	17.0	60	15.0	56	14.2	84	5	29.60	29.60	29.54	AA	29.55
09	1853	12	CLR	10.00	62	16.7	60	15.3	58	14.4	87	0	29.62	29.62	29.56	AA	29.57
09	1902	12	CLR	10.00	63	17.0	60	15.2	57	14.0	81	0	29.62	29.62	29.56	AA	29.57
09	1905	12	CLR	10.00	63	17.0	60	15.2	57	14.0	81	0	29.62	29.62	29.56	AA	29.57
09	1908	12	CLR	10.00	63	17.0	60	15.2	57	14.0	81	0	29.62	29.62	29.56	AA	29.57
09	2014	12	BKN08	10.00	53	17.0	58	14.6	55	13.0	75	0	29.64	29.64	29.58	AA	29.59
09	2034	12	CLR	10.00	61	16.0	58	14.2	55	13.0	81	0	29.64	29.64	29.58	AA	29.59
09	2053	12	CLR	10.00	61	16.1	58	14.5	56	13.3	84	0	29.64	29.64	29.58	AA	29.59
09	2153	12	CLR	10.00	59	14.4	56	13.2	55	12.8	90	0	29.65	29.65	29.59	AA	29.60
09	2253	12	FEW07	6.00	59	14.4	56	13.2	55	12.8	90	0	29.65	29.65	29.59	AA	29.60
09	2307	12	BKN07	6.00	59	14.4	56	13.2	55	12.8	90	0	29.65	29.65	29.59	AA	29.60
09	2353	12	BKN05	7.00	59	14.4	56	13.5	55	12.8	90	0	29.65	29.65	29.59	AA	29.60
09	2407	12	BKN07	6.00	57	13.0	56	13.2	55	13.0	83	0	29.65	29.65	29.59	AA	29.60
10	0029	12	BKN07	6.00	57	13.0	56	13.2	55	13.0	83	0	29.65	29.65	29.59	AA	29.60
10	0653	12	BKN09	6.00	58	14.4	56	13.5	55	12.8	90	0	29.65	29.65	29.59	AA	29.60
10	0139	12	BKN011	6.00	57	11.0	55	12.9	54	12.0	90	3	29.65	29.65	29.59	AA	29.60
10	0146	12	SC1011	6.00	57	11.0	55	12.9	54	12.0	90	3	29.65	29.65	29.59	AA	29.60

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10	0151	12	SC1006	SC1011	5.00	BR	57	14.0	55	12.9	54	12.2	90	0	0.00	29.65	SP	M	29.97	30.00
10	0201	12	SC1006	BKN011	5.00	BR	57	13.9	55	12.9	54	12.2	90	0	0.00	29.65	SP	M	29.97	30.00
10	0253	12	CLR	FEW006	5.00	BR	57	14.0	55	12.9	54	12.0	90	0	0.00	29.65	SP	M	29.97	30.00
10	0424	12	CLR	FEW014	4.00	BR	56	13.3	54	12.4	53	11.7	87	3	330	29.66	AA	M	29.97	30.01
10	0447	12	BKN012	BKN014	4.00	BR	52	13.9	55	12.6	53	11.7	87	3	330	29.66	AA	M	29.97	30.01
10	0453	12	BKN012	BKN017	4.00	BR	55	13.0	53	11.8	52	11.0	90	0	0.00	29.69	SP	M	29.97	30.04
10	0453	12	SC1018	SC1018	4.00	BR	55	13.0	53	11.8	52	11.0	90	0	0.00	29.69	SP	M	29.97	30.04
10	0653	12	CLR	FEW006	6.00	BR	58	14.4	52	12.3	51	10.8	70	0	0.00	29.69	AA	M	29.97	30.04
10	0653	12	M	M	6.00	BR	58	14.4	52	12.3	51	10.8	70	0	0.00	29.69	AA	M	29.97	30.04
10	0753	12	M	M	6.00	BR	58	14.4	52	12.3	51	10.8	70	0	0.00	29.69	AA	M	29.97	30.04
10	0853	12	M	M	6.00	BR	58	14.4	52	12.3	51	10.8	70	0	0.00	29.69	AA	M	29.97	30.04
10	1053	12	CLR	FEW014	10.00	BR	64	17.8	56	13.2	48	9.4	58	3	280	29.70	AA	M	29.97	30.05
10	1153	12	CLR	FEW014	10.00	BR	66	18.9	57	13.7	49	9.4	58	3	280	29.70	AA	M	29.97	30.05
10	1253	12	CLR	FEW014	10.00	BR	65	18.3	58	14.2	52	11.1	85	9	270	29.69	AA	M	29.97	30.04
10	1353	12	CLR	FEW014	10.00	BR	66	18.9	59	15.0	54	12.2	85	9	280	29.69	AA	M	29.97	30.04
10	1553	12	CLR	FEW014	10.00	BR	66	18.9	59	15.0	54	12.2	85	9	280	29.69	AA	M	29.97	30.04
10	1653	12	CLR	FEW014	10.00	BR	66	18.9	59	15.0	54	12.2	85	9	280	29.69	AA	M	29.97	30.04
10	1741	12	BKN014	BKN014	10.00	BR	64	18.0	60	15.5	57	14.0	78	5	280	29.62	AA	M	29.97	30.04
10	1853	12	BKN014	BKN020	8.00	BR	64	17.8	60	15.5	57	13.9	78	5	280	29.62	AA	M	29.97	30.04
10	1953	12	BKN014	BKN020	8.00	BR	64	17.8	60	15.5	57	13.9	78	5	280	29.62	AA	M	29.97	30.04
10	1953	12	SC1018	SC1018	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.63	AA	M	29.97	30.04
10	1953	12	SC1018	SC1018	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.63	AA	M	29.97	30.04
10	1953	12	SC1018	SC1018	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.63	AA	M	29.97	30.04
10	1953	12	SC1018	SC1018	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.63	AA	M	29.97	30.04
10	2014	12	SC1007	BKN012	10.00	BR	62	16.7	59	15.0	57	13.9	84	5	290	29.64	AA	M	29.97	30.04
10	2053	12	OVC016	OVC016	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.64	AA	M	29.97	30.04
10	2116	12	OVC016	OVC016	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.64	AA	M	29.97	30.04
10	2138	12	OVC016	OVC016	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.64	AA	M	29.97	30.04
10	2153	12	OVC018	OVC018	10.00	BR	63	17.0	60	15.2	57	14.0	81	0	0.00	29.64	AA	M	29.97	30.04
10	2230	12	SC1018	SC1018	10.00	BR	63	17.0	58	14.6	55	13.0	75	0	0.00	29.64	AA	M	29.97	30.04
10	2253	12	CLR	FEW014	10.00	BR	61	16.1	58	14.5	56	13.3	84	0	0.00	29.63	AA	M	29.97	30.04
10	2353	12	FEW016	FEW016	10.00	BR	61	16.1	58	14.2	55	12.8	81	0	0.00	29.61	AA	M	29.97	30.04
11	0153	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.61	AA	M	29.96	29.96
11	0253	12	SC1012	SC1012	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.61	AA	M	29.96	29.96
11	0353	12	BKN012	BKN012	10.00	BR	57	14.0	55	12.9	54	12.0	87	0	0.00	29.59	AA	M	29.95	29.95
11	0453	12	OVC014	OVC014	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.93	29.93
11	0553	12	OVC014	OVC014	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.93	29.93
11	0653	12	BKN014	BKN014	8.00	BR	59	15.0	55	12.8	52	11.1	78	0	0.00	29.59	AA	M	29.94	29.94
11	0753	12	CLR	FEW014	8.00	BR	59	15.0	55	12.8	52	11.0	78	0	0.00	29.59	AA	M	29.93	29.93
11	0853	12	CLR	FEW014	8.00	BR	59	15.0	55	12.8	52	11.0	78	0	0.00	29.59	AA	M	29.93	29.93
11	0953	12	CLR	FEW014	8.00	BR	59	15.0	55	12.8	52	11.0	78	0	0.00	29.59	AA	M	29.93	29.93
11	1053	12	CLR	FEW014	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1153	12	CLR	FEW016	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1253	12	CLR	FEW016	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1353	12	CLR	FEW016	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1453	12	CLR	FEW016	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1553	12	CLR	FEW016	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1653	12	CLR	FEW016	10.00	BR	55	13.3	56	14.5	53	11.7	85	0	0.00	29.59	AA	M	29.93	29.93
11	1753	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	1853	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	1953	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	2053	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	2153	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	2253	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	2353	12	CLR	FEW016	10.00	BR	57	13.9	55	12.6	53	11.7	87	0	0.00	29.59	AA	M	29.93	29.93
11	0153	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0253	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0353	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0453	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0553	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0653	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0753	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94
11	0853	12	CLR	FEW016	10.00	BR	60	15.6	57	13.9	55	12.8	84	0	0.00	29.59	AA	M	29.94	29.94

13	0753	12	4.00	-RA BR	60	156	58	14.6	57	13.9	90	9	150	29.54	29.55	29.88	AA	0.03	29.89
13	0800	12	5.00	-RA BR	61	160	59	14.8	57	14.0	87	6	150	29.54	29.55	29.88	SP		29.89
13	0804	12	5.00	-RA BR	61	160	59	14.8	57	14.0	87	6	150	29.54	29.55	29.88	SP		29.89
13	0808	12	10.00		62	167	60	15.2	57	14.0	87	8	140	29.55	29.56	29.89	SP		29.90
13	0853	12	10.00		62	167	60	15.2	56	14.4	87	7	140	29.55	29.56	29.89	SP		29.90
13	0951	12	10.00		64	180	60	15.5	57	14.0	78	7	140	29.55	29.56	29.89	SP		29.91
13	1001	12	10.00		64	17.8	60	15.8	56	14.4	81	6	140	29.56	29.57	29.90	AA		29.91
13	1012	12	10.00		64	180	60	15.5	57	14.0	78	7	140	29.56	29.57	29.90	AA		29.91
13	1012	12	10.00		64	180	60	15.5	57	14.0	78	7	140	29.56	29.57	29.90	AA		29.91
13	1027	12	10.00		64	180	60	15.5	57	14.0	78	6	190	29.56	29.57	29.90	AA		29.91
13	1038	12	10.00		64	180	60	15.5	57	14.0	78	6	190	29.56	29.57	29.90	AA		29.91
13	1038	12	10.00		64	180	60	15.5	57	14.0	78	6	190	29.56	29.57	29.90	AA		29.91
13	1051	12	10.00		66	183	60	15.6	56	13.3	70	5	230	29.56	29.57	29.90	SP		29.91
13	1053	12	10.00		66	190	61	15.9	57	14.0	73	7	230	29.56	29.57	29.90	SP		29.91
13	1100	12	10.00		66	183	59	15.1	55	12.8	70	6	250	29.55	29.56	29.90	AA		29.90
13	1153	12	10.00		66	190	60	15.3	55	13.0	68	6	250	29.55	29.56	29.90	AA		29.90
13	1200	12	10.00		66	190	60	15.3	55	13.0	68	6	250	29.55	29.56	29.90	AA		29.90
13	1253	12	10.00		66	190	60	15.3	55	12.8	68	5	290	29.54	29.55	29.89	SP		29.89
13	1400	12	10.00		66	200	60	15.8	55	12.8	68	5	290	29.54	29.55	29.89	SP		29.89
13	1453	12	10.00		66	190	60	15.3	55	13.0	68	6	290	29.53	29.54	29.88	AA		29.88
13	1500	12	10.00		66	190	60	15.3	55	13.0	68	6	290	29.53	29.54	29.88	AA		29.88
13	1553	12	10.00		66	190	60	15.3	55	13.0	68	6	290	29.53	29.54	29.88	AA		29.88
13	1753	12	10.00		66	190	60	15.3	55	13.0	68	6	290	29.53	29.54	29.88	AA		29.88
13	1853	12	10.00		66	190	60	15.3	55	13.0	68	6	290	29.53	29.54	29.88	AA		29.88
13	1903	12	10.00		65	183	60	15.4	56	13.3	73	5	280	29.52	29.53	29.87	AA		29.88
13	1938	12	10.00		64	179	59	15.2	56	13.3	75	6	260	29.53	29.54	29.88	AA		29.88
13	2014	12	10.00		62	167	59	15.0	57	13.9	84	0	000	29.55	29.56	29.90	SP		29.90
13	2053	12	10.00		63	170	60	15.2	57	14.0	81	0	000	29.55	29.56	29.90	SP		29.90
13	2153	12	10.00		63	170	60	15.2	57	14.0	81	0	000	29.55	29.56	29.90	SP		29.90
13	2153	12	9.00		62	167	59	14.7	56	13.3	81	0	000	29.56	29.57	29.91	AA		29.91
13	2253	12	10.00		61	160	59	14.8	57	14.0	87	0	000	29.57	29.58	29.92	AA		29.92
13	2353	12	10.00		61	160	59	14.8	57	14.0	87	0	000	29.57	29.58	29.92	AA		29.92
13	0053	12	7.00		61	161	59	14.5	56	13.3	84	0	000	29.56	29.57	29.91	AA		29.91
14	0102	12	7.00		59	150	57	13.7	55	13.0	87	0	000	29.56	29.57	29.91	AA		29.91
14	0153	12	8.00		60	156	58	14.2	55	13.3	87	0	000	29.57	29.58	29.92	SP		29.92
14	0253	12	5.00	BR	59	144	56	13.5	55	12.8	90	0	000	29.56	29.57	29.91	AA		29.92
14	0353	12	6.00	BR	59	150	57	13.7	55	13.0	87	0	000	29.56	29.57	29.91	AA		29.91
14	0453	12	5.00	BR	57	140	55	12.9	54	12.0	90	0	000	29.56	29.57	29.91	AA		29.91
14	0551	12	4.00	BR	57	140	55	12.9	54	12.0	90	0	000	29.56	29.57	29.91	AA		29.91
14	0553	12	4.00	BR	57	140	55	12.9	54	12.2	90	0	000	29.56	29.57	29.91	AA		29.91
14	0608	12	2.50	BR	57	140	55	12.9	54	12.0	90	0	000	29.56	29.57	29.91	AA		29.91
14	0650	12	0.75	BR	55	130	54	12.4	54	12.0	96	5	050	29.59	29.60	29.93	SP		29.93
14	0653	12	0.75	BR	56	133	55	12.7	54	12.2	93	5	040	29.59	29.60	29.93	SP		29.93
14	0703	12	1.75	BR	57	140	56	13.2	55	13.0	93	5	040	29.60	29.61	29.94	AA		29.94
14	0753	12	3.00	BR	57	140	56	13.2	55	13.0	93	3	050	29.60	29.61	29.94	AA		29.94
14	0753	12	3.00	BR	59	150	57	13.7	55	13.0	87	3	060	29.60	29.61	29.94	AA		29.94
14	0753	12	4.00	HZ	60	156	57	13.9	55	12.8	84	0	000	29.61	29.62	29.95	AA		29.95
14	0853	12	6.00		64	178	59	14.9	55	12.8	73	0	000	29.62	29.63	29.96	AA		29.96
14	0853	12	7.00		66	183	60	15.3	55	12.8	68	6	280	29.62	29.63	29.96	AA		29.96
14	0953	12	9.00		65	183	60	15.3	55	13.3	73	6	290	29.60	29.61	29.94	AA		29.94
14	1210	12	9.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94
14	1253	12	10.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94
14	1307	12	10.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94
14	1353	12	10.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94
14	1453	12	10.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94
14	1453	12	10.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94
14	1453	12	10.00		64	180	60	15.5	57	14.0	78	7	290	29.59	29.60	29.94	AA		29.94

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14	1553	12	OV0209	10.00	64	17.8	60	16.5	57	13.9	78	0	000	29.56	006	29.51	AA	29.51
14	1753	12	OV0211	10.00	64	17.8	60	16.5	57	13.9	78	3	VR	29.56	006	29.50	AA	29.52
14	1853	12	OV0211	7.00	63	17.2	60	16.2	57	13.9	81	3	270	29.57	006	29.91	AA	29.92
14	1853	12	OV0211	10.00	63	17.2	60	16.2	57	13.9	81	5	290	29.58	006	29.92	AA	29.92
14	1853	12	OV0211	10.00	63	17.2	60	16.2	57	13.9	81	0	000	29.57	006	29.92	AA	29.92
14	2153	12	OV0211	9.00	63	17.2	60	16.2	57	13.9	81	0	000	29.58	000	29.92	AA	29.92
14	2253	12	OV0209	9.00	63	17.2	60	16.2	57	14.0	81	0	000	29.57	000	29.92	SP	29.92
14	2253	12	OV0209	9.00	63	17.2	60	16.2	57	13.9	81	0	000	29.57	000	29.91	AA	29.92
14	2253	12	OV0209	9.00	63	17.2	60	16.2	57	13.9	84	0	000	29.56	000	29.91	AA	29.91
15	0253	12	OV0207	6.00	61	16.1	59	14.8	57	13.9	87	0	000	29.57	001	29.91	AA	29.91
15	0253	12	OV0207	6.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.57	001	29.91	AA	29.92
15	0353	12	OV0207	5.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.56	006	29.90	AA	29.91
15	0353	12	OV0207	5.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.56	006	29.90	AA	29.91
15	0442	12	OV0203	2.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.55	M	29.91	SP	29.91
15	0451	12	BKN005 OVC010	3.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.56	M	29.91	SP	29.91
15	0453	12	BKN005 OVC010	3.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.55	M	29.91	SP	29.91
15	0529	12	FEW015 OVC010	3.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.57	M	29.92	SP	29.92
15	0548	12	FEW015 OVC059	3.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.57	M	29.92	SP	29.92
15	0648	12	OV0214	3.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.58	M	29.92	SP	29.92
15	0653	12	OV0211	3.00	HZ	BR	BR	BR	BR	BR	BR	0	000	29.59	009	29.93	AA	29.94
15	0742	12	FEW004 OVC015	4.00	BR	BR	BR	BR	BR	BR	BR	5	290	29.60	M	29.94	AA	29.94
15	0742	12	FEW004 OVC015	4.00	BR	BR	BR	BR	BR	BR	BR	5	290	29.60	M	29.94	AA	29.94
15	0753	12	FEW004 OVC011	3.00	BR	BR	BR	BR	BR	BR	BR	3	290	29.60	M	29.94	AA	29.94
15	0800	12	FEW004 OVC015	4.00	BR	BR	BR	BR	BR	BR	BR	3	290	29.60	M	29.94	AA	29.94
15	0851	12	FEW005 OVC013	4.00	BR	BR	BR	BR	BR	BR	BR	5	VR	29.60	M	29.94	AA	29.95
15	0853	12	FEW005 OVC013	4.00	BR	BR	BR	BR	BR	BR	BR	6	290	29.60	M	29.94	AA	29.95
15	0853	12	FEW005 OVC013	4.00	BR	BR	BR	BR	BR	BR	BR	6	290	29.60	M	29.94	AA	29.95
15	0953	12	BKN006 OVC013	5.00	BR	BR	BR	BR	BR	BR	BR	3	VR	29.60	002	29.94	AA	29.95
15	1051	12	SCT008 OVC011	4.00	HZ	BR	BR	BR	BR	BR	BR	3	280	29.58	M	29.93	AA	29.93
15	1053	12	SCT008 OVC011	4.00	BR	BR	BR	BR	BR	BR	BR	3	280	29.58	M	29.93	AA	29.93
15	1148	12	FEW015 OVC016	9.00	BR	BR	BR	BR	BR	BR	BR	0	000	29.58	M	29.93	AA	29.93
15	1151	12	OV0216	9.00	BR	BR	BR	BR	BR	BR	BR	3	290	29.58	M	29.93	AA	29.93
15	1153	12	BKN010 OVC016	5.00	BR	BR	BR	BR	BR	BR	BR	3	240	29.58	M	29.91	AA	29.91
15	1200	12	OV0216	9.00	BR	BR	BR	BR	BR	BR	BR	3	270	29.58	M	29.91	AA	29.91
15	1232	12	OV0214	5.00	BR	BR	BR	BR	BR	BR	BR	7	290	29.55	M	29.88	AA	29.88
15	1327	12	OV0216	8.00	BR	BR	BR	BR	BR	BR	BR	5	VR	29.54	016	29.88	AA	29.89
15	1353	12	OV0218	8.00	BR	BR	BR	BR	BR	BR	BR	5	VR	29.55	016	29.88	AA	29.88
15	1453	12	OV0225	8.00	BR	BR	BR	BR	BR	BR	BR	8	290	29.52	016	29.85	AA	29.87
15	1453	12	OV0225	8.00	BR	BR	BR	BR	BR	BR	BR	8	290	29.52	016	29.85	AA	29.87
15	1553	12	OV0220	7.00	BR	BR	BR	BR	BR	BR	BR	8	290	29.51	005	29.84	AA	29.84
15	1553	12	OV0220	9.00	BR	BR	BR	BR	BR	BR	BR	5	270	29.49	005	29.84	AA	29.85
15	1653	12	OV0220	10.00	BR	BR	BR	BR	BR	BR	BR	6	240	29.50	005	29.85	AA	29.85
15	1653	12	OV0220	10.00	BR	BR	BR	BR	BR	BR	BR	7	290	29.50	005	29.85	AA	29.85
15	1653	12	OV0220	10.00	BR	BR	BR	BR	BR	BR	BR	7	290	29.50	005	29.85	AA	29.85
15	2153	12	OV0296	10.00	62	16.7	57	13.8	53	11.7	73	5	210	29.51	003	29.85	AA	29.86
15	2253	12	OV0292	10.00	62	16.7	57	13.8	53	11.7	73	0	000	29.51	003	29.85	AA	29.86
15	2353	12	OV0290	10.00	62	16.7	59	13.5	52	11.1	70	0	000	29.50	003	29.85	AA	29.85
15	2353	12	OV0290	10.00	62	16.7	59	13.5	52	11.1	70	0	000	29.50	003	29.85	AA	29.85
16	0053	12	OV0330	10.00	62	16.7	56	13.5	52	11.1	70	3	260	29.51	001	29.85	SP	29.86
16	0153	12	OV0339	10.00	61	16.1	56	13.3	52	11.1	72	5	240	29.49	001	29.85	AA	29.84
16	0253	12	FEW030 OVC038	10.00	61	16.1	56	13.3	52	11.1	72	3	190	29.48	009	29.82	AA	29.83
16	0353	12	OV033 OVC040	10.00	60	15.6	56	13.3	53	11.7	75	0	000	29.48	009	29.82	AA	29.83
16	0353	12	OV033 OVC040	10.00	60	15.6	56	13.3	53	11.7	75	0	000	29.48	009	29.82	AA	29.83
16	0553	12	OV0340	10.00	60	15.6	56	13.1	52	11.1	75	5	130	29.48	003	29.83	AA	29.83
16	0653	12	OV0342	10.00	61	16.1	56	13.3	52	11.1	72	3	130	29.52	013	29.85	AA	29.87
16	0753	12	OV0344	10.00	63	17.2	57	13.8	52	11.1	68	8	140	29.52	013	29.85	AA	29.87
16	0810	12	BKN024 OVC047	10.00	63	17.0	58	14.3	54	12.0	73	5	200	29.54	004	29.86	AA	29.89
16	0932	12	FEW024 SCT026 BKN033	10.00	63	17.0	58	14.3	54	12.0	73	7	VR	29.53	M	29.86	SP	29.88
16	0953	12	SCT024 BKN035	10.00	63	17.2	57	13.8	52	11.1	68	8	220	29.53	004	29.87	AA	29.87
16	1053	12	FEW025	10.00	65	18.3	58	14.2	52	11.1	65	9	230	29.52	008	29.87	AA	29.87
16	1253	12	FEW021	10.00	65	18.3	58	14.2	52	11.1	65	8	230	29.50	008	29.85	AA	29.85
16	1353	12	FEW024	10.00	66	18.9	58	14.5	52	11.1	61	10	260	29.51	008	29.85	AA	29.85
16	1451	12	SCT020 BKN028	10.00	64	18.0	58	14.6	54	12.0	70	10	250	29.51	M	29.85	SP	29.85

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20	1653	12	SCT012	65	183	61	18.0	58	14.4	78	6	220	29.48	5	005	29.82	'A	29.83
20	1653	12	BRN012	66	19.0	61	15.8	57	14.0	73	5	160	29.49		M	29.83	AA	29.84
20	1653	12	BRN012	64	17.8	60	15.6	57	13.9	78	6	210	29.48		M	29.83	AA	29.84
20	1700	12	SCT014	63	17.2	60	15.2	57	13.9	78	7	180	29.49		M	29.83	AA	29.84
20	1753	12	CLR	62	16.7	59	14.7	56	13.3	81	8	140	29.49	0	002	29.84	AA	29.85
20	1853	12	CLR	62	16.7	59	14.7	56	13.3	81	8	180	29.50			29.85	AA	29.86
20	2053	12	CLR	62	16.7	59	14.7	56	13.3	81	0	000	29.50			29.85	AA	29.86
20	2153	12	CLR	59	15.0	57	13.7	55	12.8	87	0	000	29.53	3	017	29.86	AA	29.88
20	2253	12	CLR	59	15.0	57	13.7	55	12.8	87	0	000	29.53			29.86	AA	29.88
20	2353	12	CLR	59	15.0	57	13.7	55	12.8	87	3	140	29.52			29.86	AA	29.88
21	0153	12	CLR	59	14.4	56	13.2	54	12.2	87	0	000	29.50	5	004	29.87	AA	29.87
21	0253	12	CLR	57	13.3	54	12.4	53	11.7	87	0	000	29.52			29.87	AA	29.87
21	0307	12	FEW006	55	13.0	54	12.4	54	12.0	96	0	000	29.51			29.85	AA	29.86
21	0353	12	CLR	55	13.3	54	12.4	53	11.7	90	0	000	29.52			29.86	AA	29.86
21	0453	12	CLR	56	13.3	54	12.4	53	11.7	90	0	000	29.52	5	001	29.86	AA	29.87
21	0553	12	CLR	56	13.3	54	12.4	53	11.7	90	0	000	29.52			29.86	AA	29.87
21	0653	12	CLR	56	13.3	54	12.4	53	11.7	90	0	000	29.52			29.86	AA	29.87
21	0753	12	CLR	56	13.3	54	12.4	53	11.7	90	0	000	29.52			29.86	AA	29.87
21	0853	12	CLR	56	13.3	54	12.4	53	11.7	90	0	000	29.52			29.86	AA	29.87
21	0953	12	CLR	76	24.4	52	11.1	24	-4.4	14	3	020	29.62	3	077	29.81	AA	29.82
21	1053	12	CLR	82	27.8	53	11.7	-8.3		9	16	080	29.62			29.85	AA	29.86
21	1153	12	CLR	85	29.4	53	11.7	8	-13.3	5	10	110	29.62	1	020	29.87	AA	29.87
21	1253	12	CLR	85	29.4	53	11.7	8	-13.3	5	17	100	29.62			29.86	AA	29.87
21	1353	12	CLR	85	29.4	53	11.6	6	-14.4	5	15	110	29.61	8	006	29.85	AA	29.86
21	1453	12	CLR	84	28.9	52	10.3		-16.0	5	17	080	29.62			29.86	AA	29.86
21	1553	12	CLR	79	26.1	50	9.9	3	-16.1	5	13	090	29.62	3	004	29.86	AA	29.87
21	1653	12	CLR	76	24.4	49	9.2	4	-15.6	6	14	080	29.66			29.86	AA	29.87
21	1753	12	CLR	75	23.9	49	9.0	5	-15.0	6	14	090	29.67	3	030	30.02	AA	30.03
21	1853	12	CLR	73	22.9	47	8.5	6	-14.4	7	5	080	29.70			30.04	AA	30.05
21	2053	12	CLR	69	20.6	46	7.9	11	-11.7	10	5	030	29.72	1	020	30.06	AA	30.08
21	2153	12	CLR	71	21.7	46	7.9	5	-15.0	7	6	080	29.72			30.06	AA	30.08
21	2353	12	CLR	74	23.3	47	8.2	1	-19.3	5	10	080	29.75			30.09	AA	30.10
22	0053	12	CLR	73	22.8	47	8.3	2	-16.1	6	8	040	29.75	3	002	30.09	AA	30.10
22	0153	12	CLR	74	23.3	48	8.6	3	-16.1	6	8	040	29.75			30.09	AA	30.10
22	0253	12	CLR	72	22.2	47	8.2	5	-15.0	7	11	110	29.75	3	005	30.10	AA	30.11
22	0453	12	CLR	72	22.2	47	8.1	3	-16.1	6	16	080	29.78			30.12	AA	30.13
22	0553	12	CLR	71	21.7	46	7.9	5	-15.0	7	8	080	29.81	3	019	30.15	AA	30.14
22	0653	12	CLR	77	25.0	49	9.4	3	-16.1	5	10	090	29.84			30.15	AA	30.14
22	0853	12	SCT001	80	27.1	50	10.0	-2	-18.0	4	10	080	29.83			30.19	AA	30.20
22	0953	12	CLR	81	27.2	51	10.3	-1	-18.3	4	10	070	29.83			30.19	AA	30.20
22	1053	12	SCT001	85	28.4	53	11.5	2	-16.7	4	18	070	29.81	0	006	30.16	AA	30.19
22	1153	12	SCT001	85	28.4	53	11.7	1	-17.0	4	18	070	29.80			30.16	AA	30.19
22	1253	12	SCT001	85	28.4	53	11.6	1	-17.0	4	18	070	29.80			30.16	AA	30.19
22	1353	12	SCT001	85	28.4	53	11.6	1	-17.0	4	18	070	29.80			30.16	AA	30.19
22	1453	12	SCT001	85	28.4	53	11.6	1	-17.0	4	18	070	29.80			30.16	AA	30.19
22	1553	12	SCT001	82	27.8	50	10.6	-1	-18.9	4	9	060	29.75	8	022	30.10	AA	30.12
22	1653	12	SCT001	80	26.7	50	10.0	-2	-18.9	4	16	080	29.75			30.10	AA	30.12
22	1753	12	SCT001	79	26.1	50	9.8	-0	-17.8	4	13	070	29.77	6	004	30.09	AA	30.11
22	1853	12	SCT001	84	27.5	49	9.6	1	-17.2	5	10	080	29.77	3	006	30.11	AA	30.12
22	2053	12	CLR	79	25.1	50	10.0	4	-15.6	5	9	000	29.75			30.10	AA	30.11
22	2153	12	CLR	81	27.2	51	10.5	3	-16.1	5	15	090	29.75	5	002	30.10	AA	30.11
22	2353	12	CLR	81	27.2	51	10.5	4	-15.6	5	11	120	29.75			30.08	AA	30.10
23	0053	12	CLR	81	27.2	52	10.8	9	-12.5	5	10	070	29.73	6	009	30.07	AA	30.09
23	0153	12	CLR	73	22.8	48	8.1	13	-10.6	10	0	000	29.70			30.06	AA	30.07
23	0253	12	CLR	69	20.8	48	8.6	18	-7.8	14	0	000	29.70	6	012	30.04	AA	30.06
23	0453	12	CLR	67	20.2	48	8.2	22	-5.6	18	3	340	29.70			30.05	AA	30.06
23	0553	12	OVC032	72	22.2	49	8.9	20	-8.7	14	3	140	29.72			30.06	AA	30.07

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25	1853	12	CLR	4.00	HZ FU	73	22.8	57	14.0	44	63	35	0	100	29.49	29.53	AA	29.84
25	1853	12	CLR	3.00	HZ FU	71	21.7	59	14.8	49	9.4	46	0	000	29.50	29.83	AA	29.85
25	1853	12	CLR	6.00	HZ FU	68	20.0	57	14.1	49	9.4	51	0	000	29.50	29.84	AA	29.85
25	2053	12	CLR	5.00	HZ FU	87	19.4	55	12.9	45	7.2	47	0	000	29.51	29.85	AA	29.86
25	2153	12	CLR	6.00	HZ FU	84	17.8	52	11.0	46	7.4	47	0	000	29.51	29.86	AA	29.86
25	2253	12	CLR	6.00	HZ FU	63	17.2	50	10.1	37	2.9	33	0	000	29.51	29.86	AA	29.86
25	2353	12	CLR	6.00	HZ FU	62	16.7	51	10.3	39	3.9	33	0	000	29.51	29.85	AA	29.85
25	0153	12	R	6.00	HZ FU	62	16.7	49	9.8	36	2.2	38	0	000	29.50	29.84	AA	29.85
25	0253	12	CLR	6.00	HZ FU	58	14.4	50	9.7	41	6.0	54	0	000	29.49	29.84	AA	29.85
25	0353	12	CLR	5.00	HZ FU	57	13.9	50	10.2	44	6.7	62	0	000	29.49	29.84	AA	29.84
25	0453	12	CLR	5.00	HZ FU	55	12.8	49	9.2	42	5.6	62	0	000	29.51	29.85	AA	29.86
25	0553	12	CLR	4.00	HZ FU	54	12.2	51	10.7	40	7.4	59	0	000	29.51	29.85	AA	29.86
25	0653	12	CLR	4.00	BR FU	54	12.0	52	11.0	50	10.0	86	0	000	29.54	29.86	SP	29.89
25	0701	12	FEW001	1.50	BR FU	54	12.0	53	11.6	52	11.0	93	0	000	29.55	29.90	SP	29.90
25	0704	12	V001	0.75	PG FU	54	12.0	53	11.6	52	11.0	93	0	000	29.55	29.90	SP	29.90
25	0733	12	V001	0.00	PG FU	55	13.0	54	12.4	54	12.4	96	0	000	29.56	29.90	AA	29.91
25	0819	12	SCN001	2.00	BR FU	55	13.0	54	12.4	54	12.0	96	0	000	29.56	29.91	M	29.91
25	0825	12	SCN001	2.00	BR FU	55	13.0	54	12.4	54	12.0	96	0	000	29.56	29.91	M	29.91
25	0843	12	CLR	3.00	HZ FU	57	14.0	54	12.3	52	11.0	83	0	250	29.57	29.92	AA	29.92
25	0843	12	CLR	2.50	HZ FU	61	16.1	57	13.6	53	11.7	75	3	000	29.57	29.92	SP	29.93
25	0953	12	CLR	2.50	HZ FU	66	18.9	60	15.3	55	12.8	68	0	000	29.59	29.93	AA	29.93
25	1053	12	CLR	2.00	HZ FU	66	18.9	60	15.3	55	12.8	68	0	250	29.57	29.92	AA	29.92
25	1100	12	CLR	3.00	HZ FU	66	19.0	60	15.3	55	13.0	68	6	250	29.57	29.92	M	29.92
25	1253	12	CLR	4.00	HZ FU	67	18.4	60	15.5	55	12.8	68	6	240	29.55	29.90	AA	29.90
25	1353	12	CLR	4.00	HZ FU	66	18.9	60	15.3	55	12.8	68	8	240	29.55	29.90	AA	29.90
25	1453	12	CLR	6.00	HZ FU	67	18.4	61	15.8	56	13.3	68	9	240	29.56	29.91	AA	29.91
25	1553	12	FEW015	4.00	HZ FU	65	17.3	59	14.2	56	13.3	75	0	000	29.57	29.92	AA	29.92
25	1753	12	FEW015	8.00	HZ FU	64	17.8	59	15.2	56	13.3	75	0	000	29.57	29.92	AA	29.92
25	1853	12	CLR	6.00	HZ FU	62	16.7	59	14.7	56	13.3	81	6	230	29.56	29.91	AA	29.91
25	1953	12	CLR	6.00	HZ FU	62	16.7	59	15.0	57	13.9	84	3	220	29.56	29.91	AA	29.91
25	2018	12	BKN007	7.00	FU	63	17.0	60	15.2	57	14.0	81	0	000	29.64	29.92	AA	29.92
25	2053	12	FEW007	7.00	FU	63	17.0	60	15.2	57	14.0	81	0	000	29.70	29.96	AA	29.96
25	2253	12	CLR	3.00	BR FU	61	16.1	59	14.8	57	13.9	87	0	000	29.64	29.99	M	29.99
25	2353	12	CLR	5.00	BR FU	61	16.1	59	14.8	57	13.9	87	0	000	29.64	29.99	M	29.99
25	2353	12	CLR	7.00	FU	63	17.2	58	14.3	54	12.2	73	0	000	29.65	29.99	AA	29.99
25	2353	12	CLR	7.00	FU	61	16.1	57	13.9	54	12.2	73	0	000	29.65	29.99	AA	29.99
25	0053	12	CLR	5.00	BR FU	61	16.0	58	14.2	55	13.0	81	0	000	29.67	30.01	AA	30.02
25	0118	12	SCN005	5.00	BR FU	60	15.6	58	14.2	56	13.0	87	0	000	29.67	30.03	M	30.03
25	0153	12	CLR	5.00	BR FU	60	15.6	58	14.2	56	13.0	87	0	000	29.67	30.03	M	30.03
25	0253	12	OVC005	5.00	BR FU	61	16.1	59	14.8	57	13.9	87	0	000	29.67	30.03	AA	30.03
25	0353	12	OVC005	5.00	BR FU	61	16.1	59	14.8	57	13.9	87	0	000	29.70	30.04	AA	30.05
25	0453	12	OVC003	3.00	BR FU	61	16.0	59	14.8	57	14.0	87	0	000	29.70	30.05	SP	30.06
25	0553	12	OVC003	3.00	BR FU	60	15.6	58	14.2	56	13.3	85	0	000	29.70	30.05	AA	30.06
25	0600	12	OVC001	3.00	BR FU	61	16.0	59	14.8	57	14.0	87	3	020	29.70	30.05	AA	30.05
25	0617	12	SCN001	4.00	BR FU	61	16.0	59	14.8	57	14.0	87	0	000	29.70	30.05	M	30.05
25	0653	12	CLR	3.00	BR FU	60	15.6	58	14.2	56	13.0	87	0	000	29.72	30.08	M	30.08
25	0753	12	CLR	5.00	HZ FU	62	16.7	58	14.4	55	12.8	78	5	070	29.73	30.09	AA	30.09
25	0853	12	CLR	6.00	HZ FU	66	18.9	59	15.0	54	12.2	65	3	VR	29.75	30.09	AA	30.09
25	0953	12	FEW042	4.00	HZ FU	68	20.0	61	16.1	56	13.3	65	0	000	29.77	30.11	AA	30.12
25	1153	12	CLR	5.00	HZ FU	70	21.1	60	16.6	53	11.7	55	3	030	29.75	30.10	AA	30.10
25	1253	12	CLR	4.00	HZ FU	73	22.8	60	16.7	51	10.6	48	0	000	29.72	30.07	AA	30.08
25	1340	12	FEW008	4.00	-RA FU	73	23.0	58	14.3	45	7.0	37	6	040	29.70	30.05	SP	30.05
25	1453	12	CLR	8.00	-RA FU	77	25.0	57	13.8	59	9.9	26	5	950	29.70	30.05	AA	30.05
25	1553	12	CLR	8.00	FU	69	20.6	63	17.2	59	15.06	71	0	000	29.72	30.06	AA	30.07
25	1653	12	SCN220	8.00	FU	69	20.6	60	15.4	63	11.7	57	6	330	29.72	30.06	AA	30.06
25	1753	12	BKN220	10.00	FU	69	20.6	59	15.1	62	11.1	55	0	000	29.73	30.08	AA	30.08

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27	1853	12	FEW080	9.00	-RA FU	70	21.1	61	15.9	54	12.2	57	0	050	29.72	30.07	AA	30.08
27	1953	12	CLR	9.00	FU	68	20.0	60	15.5	54	12.2	61	0	000	29.75	30.09	AA	30.10
27	2053	12	CLR	7.00	FU	66	18.9	60	15.6	56	13.3	70	0	000	29.77	30.11	AA	30.12
27	2153	12	CLR	8.00	FU	63	17.3	58	14.8	54	12.2	70	0	000	29.75	30.10	AA	30.11
27	2253	12	CLR	9.00	FU	63	17.2	56	13.2	50	10.0	63	0	000	29.75	30.10	AA	30.11
28	0053	12	CLR	9.00	FU	61	16.1	55	12.8	50	10.0	67	0	000	29.75	30.10	AA	30.11
28	0153	12	CLR	9.00	FU	60	15.6	55	12.5	50	10.0	70	0	000	29.75	30.09	AA	30.09
28	0253	12	CLR	9.00	FU	60	15.6	55	12.5	50	10.0	63	0	000	29.75	30.09	AA	30.09
28	0353	12	CLR	5.00	HZ FU	60	15.6	52	11.2	45	7.2	58	0	000	29.75	30.10	AA	30.10
28	0453	12	CLR	4.00	HZ FU	58	15.0	52	11.2	46	7.5	62	0	000	29.75	30.10	AA	30.11
28	0553	12	CLR	4.00	HZ FU	58	15.0	52	11.2	46	8.0	62	0	000	29.77	30.12	M	30.12
28	0653	12	CLR	2.50	HZ FU	57	14.5	51	10.8	45	6.8	61	0	000	29.78	30.13	AA	30.13
28	0753	12	CLR	2.50	HZ FU	67	19.4	66	13.4	47	8.3	46	0	000	29.78	30.14	M	30.14
28	0851	12	SC T001	3.00	HZ FU	70	21.0	58	14.3	48	8.0	46	0	000	29.78	30.14	SP	30.14
28	0953	12	SC T001	3.00	HZ FU	70	21.1	58	14.3	48	8.9	46	0	000	29.78	30.13	SP	30.13
28	1053	12	CLR	2.50	HZ FU	72	22.0	59	14.8	48	9.1	45	0	250	29.78	30.13	SP	30.13
28	1153	12	CLR	2.50	HZ FU	72	22.0	59	14.8	48	9.1	45	0	270	29.78	30.13	SP	30.13
28	1253	12	CLR	3.00	HZ FU	73	23.0	61	16.0	50	11.0	48	3	270	29.78	30.13	SP	30.13
28	1353	12	CLR	3.00	HZ FU	75	23.8	61	15.9	50	11.0	48	3	270	29.78	30.12	AA	30.12
28	1453	12	CLR	6.00	HZ FU	79	26.1	64	17.5	53	11.7	41	0	000	29.73	30.09	AA	30.09
28	1553	12	CLR	6.00	HZ FU	79	26.1	64	17.5	53	11.7	41	0	000	29.72	30.07	AA	30.07
28	1653	12	CLR	6.00	HZ FU	75	23.3	63	17.2	55	12.6	55	3	290	29.72	30.06	AA	30.06
28	1753	12	CLR	6.00	HZ FU	72	22.2	62	16.6	55	12.8	55	6	290	29.72	30.06	AA	30.07
28	1853	12	CLR	10.00	FU	70	21.1	61	15.9	54	12.2	57	0	000	29.72	30.06	AA	30.06
28	1953	12	CLR	10.00	FU	70	21.1	61	15.9	54	12.2	57	0	000	29.72	30.07	AA	30.07
28	2053	12	CLR	10.00	FU	68	20.0	60	15.5	54	12.2	63	0	000	29.72	30.07	AA	30.07
28	2153	12	CLR	10.00	FU	64	17.8	58	14.6	54	12.2	63	0	000	29.73	30.09	AA	30.09
28	2253	12	CLR	10.00	FU	62	16.7	57	14.1	53	11.7	70	0	000	29.77	30.11	AA	30.11
28	2353	12	CLR	10.00	FU	63	17.2	57	14.1	53	11.7	70	0	000	29.77	30.11	AA	30.11
28	2453	12	CLR	10.00	FU	62	16.7	56	13.3	51	10.6	67	0	000	29.77	30.11	AA	30.11
29	0053	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0153	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0253	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0353	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0453	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0553	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0653	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0753	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0853	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	0953	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1053	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1153	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1253	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1353	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1453	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1553	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1653	12	CLR	10.00	FU	61	16.1	56	13.0	51	10.6	70	0	000	29.75	30.10	AA	30.10
29	1753	12	CLR	8.00	BR	64	17.9	62	16.4	60	15.6	84	3	210	29.70	30.04	AA	30.05
29	1853	12	CLR	6.00	BR	64	17.9	62	16.4	60	15.6	87	3	210	29.70	30.05	AA	30.05
29	1953	12	CLR	6.00	BR	64	17.9	62	16.4	60	15.6	87	3	210	29.70	30.05	AA	30.05
29	2053	12	CLR	7.00	BR	62	16.7	59	15.0	57	13.9	84	3	200	29.72	30.05	AA	30.05
29	2153	12	CLR	8.00	BR	62	16.7	59	15.0	57	13.9	84	3	200	29.72	30.05	AA	30.05
29	2253	12	CLR	8.00	BR	60	15.6	58	14.6	57	13.9	90	0	000	29.72	30.05	AA	30.05
29	2353	12	CLR	6.00	BR	60	15.6	58	14.6	57	13.9	90	0	000	29.72	30.05	AA	30.05
29	2453	12	CLR	6.00	BR	60	15.6	58	14.6	57	13.9	90	0	000	29.72	30.05	AA	30.05
30	0113	12	CLR	7.00	BR	61	16.0	59	14.8	57	14.0	80	0	000	29.70	30.05	AA	30.05
30	0153	12	CLR	7.00	BR	59	15.0	57	14.0	56	13.3	90	0	000	29.70	30.05	AA	30.05
30	0253	12	CLR	6.00	BR	59	15.0	57	14.0	56	13.3	90	0	000	29.70	30.05	AA	30.05
30	0316	12	CLR	6.00	BR	57	14.0	56	13.2	55	13.0	93	0	000	29.70	30.06	M	30.06
30	0358	12	CLR	6.00	BR	57	14.0	56	13.2	55	13.0	93	0	000	29.70	30.06	M	30.06
30	0358	12	CLR	6.00	BR	59	15.0	57	13.7	55	13.0	87	0	000	29.70	30.06	M	30.06
30	0353	12	FEW008 SCT014	5.00	BR	59	15.0	57	14.0	56	13.3	90	0	000	29.70	30.05	AA	30.05
30	0356	12	FEW008 BKN014	5.00	BR	59	15.0	57	13.7	55	13.0	87	0	000	29.70	30.05	AA	30.05
30	0356	12	SC T006 SCT016	5.00	BR	59	15.0	57	13.7	55	13.0	87	0	000	29.70	30.05	M	30.05

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30	0414	12	BKN008 BKN017	5.00	BR	58	15.0	57	13.7	55	13.0	87	0	000	29.70	M	30.05	SP	30.05
30	0426	12	FEW008	6.00	BR	58	15.0	57	13.7	55	13.0	87	0	000	29.70	M	30.05	SP	30.05
30	0433	12	CLR	6.00	BR	58	14.4	56	13.5	55	12.8	90	0	000	29.70	M	30.05	SP	30.05
30	0440	12	FEW008	6.00	BR	57	14.0	56	13.2	55	13.0	93	0	000	29.70	M	30.05	SP	30.05
30	0521	12	BKN002 BKN013	6.00	BR	57	14.0	56	13.2	55	13.0	93	0	000	29.70	M	30.05	SP	30.05
30	0528	12	SCT002	6.00	BR	57	13.9	56	13.2	55	12.8	93	0	000	29.70	M	30.05	SP	30.05
30	0558	12	CLR	5.00	BR	57	14.0	56	13.2	55	13.0	93	0	000	29.70	M	30.05	SP	30.05
30	0559	12	BKN008	0.75	BR	59	15.0	58	14.3	57	14.0	93	0	000	29.72	M	30.07	SP	30.07
30	0600	12	FEW008	0.75	BR	59	15.0	58	14.3	57	14.0	93	0	000	29.72	M	30.07	SP	30.07
30	0651	12	FEW005 BKN010	0.75	BR	59	15.0	58	14.3	57	14.0	93	0	000	29.72	M	30.08	AA	30.08
30	0657	12	FEW005 BKN010	0.75	BR	59	15.0	58	14.3	57	14.0	93	0	000	29.72	M	30.08	AA	30.08
30	0705	12	OVC010	2.00	BR	59	15.0	58	14.3	57	14.0	93	0	000	29.73	M	30.10	SP	30.09
30	0712	12	OVC010	3.00	BR	59	15.0	58	14.3	57	14.0	93	0	000	29.73	M	30.10	SP	30.09
30	0851	12	OVC016	6.00	HZ	63	17.2	58	14.6	55	13.0	75	0	000	29.75	M	30.11	AA	30.11
30	0853	12	OVC016	6.00	HZ	63	17.2	58	14.6	55	12.8	75	0	000	29.75	M	30.11	AA	30.11
30	0953	12	OVC016	10.00		64	17.8	58	14.6	54	12.2	70	0	000	29.75	M	30.11	AA	30.11
30	1000	12	OVC016	10.00		64	17.8	58	14.6	54	12.2	70	0	000	29.75	M	30.11	AA	30.11
30	1053	12	SCT018	10.00		65	18.3	59	14.8	54	12.2	68	0	000	29.75	M	30.11	AA	30.11
30	1153	12	CLR	10.00		65	18.3	59	14.8	54	12.2	68	0	000	29.73	M	30.07	AA	30.07
30	1330	12	CLR	10.00		64	18.0	58	14.6	54	12.0	70	8	230	29.72	M	30.08	AA	30.07
30	1330	12	CLR	10.00		64	18.0	58	14.6	54	12.0	70	8	230	29.72	M	30.08	AA	30.07
30	1415	12	CLR	10.00		64	17.8	58	14.6	54	12.2	70	7	210	29.70	M	30.05	AA	30.05
30	1553	12	FEW013	10.00		63	17.2	58	14.6	55	12.8	78	5	240	29.72	M	30.07	AA	30.07
30	1653	12	CLR	10.00		61	16.0	58	14.2	55	13.0	81	3	270	29.72	M	30.07	AA	30.07
30	1729	12	FEW011	10.00		61	16.0	58	14.2	55	13.0	81	3	270	29.72	M	30.07	AA	30.07
30	1742	12	FEW011	10.00		61	16.1	58	14.2	55	12.9	81	3	270	29.72	M	30.07	AA	30.07
30	1853	12	CLR	9.00		60	16.6	57	13.6	54	12.2	84	0	000	29.72	M	30.07	AA	30.08
30	1853	12	CLR	9.00		59	16.0	56	13.4	54	12.2	84	0	000	29.73	M	30.08	AA	30.08
30	2153	12	CLR	7.00		58	14.4	56	13.2	54	12.7	84	0	000	29.73	M	30.08	AA	30.08
30	2253	12	CLR	8.00		57	13.9	54	12.3	53	11.1	83	0	000	29.73	M	30.08	AA	30.08
30	2353	12	CLR	6.00	BR	56	13.3	54	12.1	52	11.1	87	0	000	29.73	M	30.08	AA	30.09
31	0053	12	CLR	6.00	BR	55	12.8	53	11.8	52	11.1	90	0	000	29.73	M	30.08	AA	30.09
31	0100	12	CLR	6.00	BR	55	12.8	53	11.8	52	11.1	90	0	000	29.73	M	30.08	AA	30.09
31	0202	12	SCT008	5.00	BR	55	13.0	53	11.8	52	11.0	90	0	000	29.72	M	30.08	AA	30.08
31	0213	12	BKN008	2.50	BR	55	13.0	53	11.8	52	11.0	90	0	000	29.72	M	30.08	AA	30.08
31	0234	12	BKN002 OVC008	2.50	BR	55	13.0	53	11.8	52	11.0	90	0	000	29.72	M	30.08	AA	30.08
31	0253	12	OVC002	0.75	BR	55	13.8	54	12.4	54	12.0	98	0	000	29.72	M	30.08	AA	30.08
31	0342	12	OVC002	0.75	BR	55	13.8	54	12.4	54	12.0	98	0	000	29.72	M	30.08	AA	30.08
31	0353	12	OVC002	1.25	BR	55	12.8	54	12.4	54	12.2	96	3	070	29.72	M	30.07	AA	30.08
31	0415	12	OVC002	0.50	FG	55	13.0	54	12.4	54	12.0	98	0	000	29.72	M	30.07	AA	30.08
31	0415	12	OVC002	0.50	FG	55	13.0	54	12.4	54	12.0	98	0	000	29.72	M	30.07	AA	30.08
31	0449	12	VW001	0.25	FG	54	12.2	53	11.9	53	11.7	96	3	070	29.72	M	30.07	AA	30.08
31	0453	12	VW001	0.25	FG	54	12.2	53	11.9	53	11.7	96	3	070	29.72	M	30.07	AA	30.08
31	0542	12	OVC001	0.75	BR	54	12.0	53	11.6	52	11.0	93	3	050	29.72	M	30.07	AA	30.07
31	0542	12	OVC001	0.75	BR	54	12.0	53	11.6	52	11.0	93	3	050	29.72	M	30.07	AA	30.07
31	0551	12	BKN001	5.00	BR	54	11.7	52	11.3	52	11.0	93	3	050	29.72	M	30.07	AA	30.07
31	0553	12	BKN001	5.00	BR	54	11.7	52	11.3	52	11.1	96	0	000	29.72	M	30.07	AA	30.07
31	0804	12	SCT001	7.00	BR	54	12.0	53	11.6	52	11.0	93	0	000	29.72	M	30.07	AA	30.07
31	0853	12	CLR	6.00	BR	55	12.8	53	11.8	52	11.1	90	0	000	29.72	M	30.07	AA	30.08
31	0853	12	CLR	6.00	HZ	55	12.8	53	11.8	52	11.1	90	0	000	29.72	M	30.09	AA	30.09
31	0853	12	CLR	7.00	BR	53	17.2	59	13.5	51	10.6	65	3	VR	29.75	M	30.09	AA	30.09
31	0853	12	CLR	7.00	BR	53	17.2	59	13.5	51	10.6	65	3	VR	29.75	M	30.09	AA	30.09
31	0953	12	CLR	8.00		65	18.3	57	14.0	51	10.6	61	7	240	29.73	M	30.08	AA	30.09
31	1053	12	CLR	7.00		63	17.2	58	14.6	55	12.8	75	7	260	29.73	M	30.08	AA	30.09
31	1131	12	BKN007	6.00	HZ	63	17.0	58	14.6	55	13.0	75	7	VR	29.72	M	30.07	AA	30.08
31	1131	12	BKN007	6.00	HZ	63	17.0	58	14.6	55	13.0	75	7	VR	29.72	M	30.07	AA	30.08
31	1153	12	BKN007	6.00	HZ	63	17.2	59	14.9	56	13.3	78	8	270	29.72	M	30.07	AA	30.08
31	1253	12	BKN009	6.00	HZ	63	17.2	59	14.9	56	13.3	78	8	270	29.70	M	30.05	AA	30.06
31	1326	12	BKN011	8.00		64	18.0	59	14.9	55	13.0	73	5	VR	29.70	M	30.05	AA	30.06
31	1326	12	BKN011	8.00		64	18.0	59	14.9	55	13.0	73	5	VR	29.70	M	30.05	AA	30.06
31	1353	12	CLR	7.00		64	17.8	59	15.2	56	13.3	75	8	260	29.69	M	30.03	AA	30.04
31	1453	12	SCT012	9.00		64	17.8	59	15.2	56	13.3	75	8	260	29.69	M	30.03	AA	30.04
31	1508	12	BKN012	9.00		64	18.0	59	14.9	55	13.0	73	6	270	29.69	M	30.04	AA	30.04
31	1553	12	OVC012	9.00		63	17.2	59	14.9	55	13.3	78	5	240	29.69	M	30.04	AA	30.04

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31	1653	12	OVC012	6.00	HZ	63	17.2	56	14.6	55	12.8	75	8	260	26.70	30.05	AA	30.06
31	1753	12	OVC012	9.00		62	16.7	56	14.4	55	12.8	78	3	260	26.72	30.07	AA	30.06
31	1853	12	OVC012	9.00		61	16.1	56	14.2	55	12.8	81	0	000	26.72	30.07	AA	30.08
31	1953	12	FEW012	7.00		61	16.0	56	14.2	55	13.0	81	0	000	26.72	M	SP	30.08
31	2053	12	CLR	6.00		60	15.6	57	13.9	55	12.8	84	0	000	26.73	30.08	AA	30.09
31	2153	12	CLR	6.00	HZ	58	15.0	56	13.4	54	12.2	84	0	000	26.73	30.08	AA	30.09
31	2253	12	CLR	5.00	HZ	58	15.0	56	13.4	54	12.2	84	0	000	26.73	30.08	AA	30.09
31	2353	12	CLR	4.00	BR	57	13.9	55	12.8	53	11.7	87	0	000	26.72	30.07	AA	30.07

Dynamically generated Fri Jun 06 15:43:35 EDT 2008 via <http://cdo.ncdc.noaa.gov/qcled/QCLCD>

A-17

WIND DIRECTION CATEGORIES (D*):

- CALM
 - +90° < D* < +60°
 - +60° < D* < +30°
 - +30° < D* < +10°
 - +10° < D* < +10°
 - 10° < D* < -30°
 - 30° < D* < -60°
 - 60° < D* < -90°
-
- C
 - 9/6 TOWARD SITE
 - 6/3 TOWARD SITE
 - 3/1 TOWARD SITE
 - 0 ALONG L-5
 - 1/3 AWAY FROM SITE
 - 3/6 AWAY FROM SITE
 - 6/9 AWAY FROM SITE

OCT	HOUR OF DAY																
	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 Noon	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM
1	C	3 -6/9	3 -6/9	6 -6/9	C	11 -6/9	8 -6/9	8 -3/6	9 -6/9	5 V	7 V	6 -3/6	3 -3/6	C	C	C	C
2	C	C	C	C	7 -6/9	7 -6/9	7 -6/9	8 -6/9	5 V	8 -6/9	7 -6/9	C	C	C	C	C	C
3	C	C	C	C	6 -3/6	9 -6/9	6 -3/6	6 -3/6	5 -3/6	6 -3/6	5 -6/9	5 -6/9	3 -3/6	C	C	C	C
4	7 0	6 0	5 0	7 -3/6	10 -6/9	11 -6/9	10 -3/6	13 -6/9	11 -6/9	14 -6/9	13 -3/6	9 -1/3	7 -3/6	8 -6/9	8 -6/9	8 -1/3	6 0
5	5 -1/3	8 -6/9	13 -6/9	11 -3/6	11 -3/6	9 -3/6	11 -6/9	6 V	8 -3/6	9 -1/3	13 -3/6	8 -6/9	5 V	6 -3/6	C	3 -3/6	3 -6/9
6	5 9/6	5 6/3	3 3/1	C	7 V	9 -6/9	9 -3/6	7 -3/6	6 V	8 -3/6	9 -3/6	8 -3/6	C	C	C	6 9/6	C
7	C	C	C	C	C	5 3/1	6 V	5 -3/6	11 -3/6	9 -3/6	6 V	3 V	6 V	C	3 -1/3	C	C
8	C	5 9/6	C	C	C	7 -6/9	6 -6/9	8 -3/6	7 -3/6	9 -6/9	3 V	3 -6/9	C	C	C	C	C
9	3 3/1	C	3 -3/6	3 -6/9	6 -6/9	7 -3/6	6 V	7 -6/9	7 -3/6	7 -6/9	5 V	5 V	3 -3/6	C	C	C	C
10	C	C	MD	3 -3/6	6 -3/6	9 -3/6	9 -3/6	9 -3/6	9 -3/6	10 -3/6	6 V	3 V	6 V	5 0	C	C	C
11	C	C	C	3 V	9 -6/9	7 -6/9	10 -6/9	3 V	8 -6/9	9 -6/9	5 -6/9	5 -3/6	C	C	C	C	5 0
12	3 0	5 0	6 0	8 -3/6	9 -6/9	8 -6/9	10 -6/9	8 -6/9	9 -6/9	9 -6/9	10 -6/9	6 -3/6	C	C	C	4 -6/9	C

13	10	0	8	0	6	0	7	0	6	0	6	-6/9	6	-6/9	5	-6/9	6	V	6	-3/6	5	-3/6	6	-6/9	C	C	C	C							
14	C	5	6/3	C	6	-3/6	8	-3/6	6	-3/6	7	-3/6	7	-6/9	C	3	V	3	-3/6	5	-3/6	C	C	C	C	C	C	C							
15	C	C	3	-6/9	6	-6/9	3	V	C	4	-6/9	6	-3/6	8	-3/6	6	-6/9	3	-6/9	8	-6/9	5	-3/6	6	-6/9	7	-6/9	3	-6/9	5	-6/9				
16	5	3/1	3	3/1	8	0	6	V	8	-6/9	9	-6/9	8	-6/9	10	-6/9	9	-6/9	8	-6/9	3	-6/9	5	-3/6	5	-6/9	5	-6/9	3	-1/3					
17	C	C	C	6	-1/3	3	0	7	-6/9	11	-6/9	11	-6/9	14	-6/9	10	-6/9	9	-6/9	7	-6/9	7	-3/6	5	3/1	3	6/3	5	6/3	5	0				
18	C	C	C	3	V	5	-3/6	8	-6/9	7	V	8	-3/6	8	-6/9	6	-3/6	7	-6/9	C	C	C	C	C	C	C	C	C	C	C					
19	C	3	6/3	C	5	-6/9	6	V	7	-3/6	5	-3/6	6	-3/6	5	-6/9	6	-6/9	C	C	3	V	C	C	C	C	C	C	C	C					
20	C	5	6/3	5	-6/9	8	-6/9	7	-1/3	7	-6/9	8	-6/9	5	-6/9	7	-6/9	7	-6/9	6	-6/9	6	0	7	3/1	8	0	3	0	C	C				
21	5	V	C	6	V	3	6/3	16	9/6	18	6/3	17	9/6	17	6/3	15	6/3	17	6/3	14	6/3	13	6/3	15	6/3	14	6/3	5	9/6	3	9/6	5	6/3		
22	18	9/6	8	9/6	10	6/3	11	9/6	18	9/6	16	9/6	14	6/3	16	9/6	15	9/6	8	9/6	17	9/6	13	9/6	8	9/6	10	9/6	14	9/6	9	6/3			
23	C	C	C	3	-6/9	3	-3/6	6	-6/9	7	-6/9	6	-3/6	C	6	-6/9	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	5	9/6		
24	C	C	C	C	C	5	-6/9	C	C	7	-6/9	3	-3/6	3	V	7	0	3	0	C	C	3	3/1	C	C	C	C	C	C	C	C	C	C		
25	3	9/6	C	C	C	C	C	C	C	3	-6/9	5	-6/9	5	-6/9	5	-6/9	6	-6/9	3	-3/6	C	C	C	C	C	C	C	C	C	C	C	C	C	
26	C	C	C	C	3	V	C	C	5	-6/9	7	-6/9	6	-6/9	8	-6/9	9	-6/9	3	-6/9	C	C	6	-6/9	3	-6/9	C	C	C	C	C	C	C	C	
27	3	9/6	C	C	5	9/6	3	V	C	C	3	6/3	C	6	9/6	3	-3/6	C	6	0	C	5	9/6	C	C	C	C	C	C	C	C	C	C	C	
28	C	C	C	C	C	5	-6/9	5	-3/6	C	9	-3/6	C	9	-3/6	3	V	6	-6/9	3	-3/6	C	C	C	C	C	C	C	C	C	C	C	C	C	
29	C	5	6/3	C	6	-3/6	C	3	-3/6	C	6	-3/6	3	-3/6	3	0	8	-6/9	6	-6/9	C	3	-6/9	3	-6/9	3	-6/9	C	C	3	-3/6	C	C	C	
30	C	C	C	C	8	-6/9	6	-6/9	9	-6/9	9	-6/9	9	-6/9	7	-6/9	7	-6/9	7	-6/9	5	-6/9	5	-6/9	C	C	C	C	C	C	C	C	C	C	C
31	C	C	C	3	V	7	-6/9	7	-6/9	8	-3/6	7	-6/9	8	-6/9	8	-6/9	5	-6/9	8	-6/9	3	-6/9	8	-6/9	3	-6/9	C	C	C	C	C	C	C	C

Comments to the Recirculated Portions of the Hall Property Draft EIR

The city continues to call the Hall property project a Community Park. It is not. It is by the city's own definition a Special Use Park. Please call it by its correct name.

S16-1

Air Quality

The report states (Part 1, 1.0, page 1) that, "According to the California Air Resources Board's (ARB) Air Quality and Land Use Handbook (ARB 2005), the ARB's advisory recommendations are to avoid siting sensitive land uses within 500 feet of a freeway." Common sense and prudence says that locating any athletic fields inside this zone is not in the public interest. The report concedes (Part 1, page14) that, "Exposure and toxicity assessment have been recognized by EPA as the largest sources of uncertainties in the risk assessment process (EPA 1992, 1997)." All the more reason not to place athletic fields in this zone, creating a public liability. It would not be a substantial public benefit. In fact it would create a public liability.

S16-2

The meteorological data from the Miramar and Del Mar monitoring stations used in the report are not satisfactory for assessing risk. Only data from an onsite station can give accurate results. Coastal San Diego County is a low wind area. Sustained winds are rare. Whether onshore or offshore conditions prevail, it is most common to have little or no winds away from the shore line, except at mouth of river canyons, as at Del Mar, or at flat, windswept areas, as at Miramar. Under onshore conditions the Hall property is mostly located in the wind shadow of Rossini Canyon with higher ground to the west blocking lighter breezes. The varied topography and myriad microclimates in San Diego County make comparisons of the Hall property to Del Mar and Miramar inappropriate.

S16-3

Even under strong offshore conditions (Santa Ana winds), the wind often blows hard for 1-2 days, but the offshore condition without winds can last for as much as 14 days. When onshore conditions set in and get locked, it is common to have weeks and weeks of calm weather. The result of all of this is to have a large number of days when the air on the Hall property is essentially stagnant. This has not been considered in the report, although Southern California has longed suffered from poor air quality because of climatic conditions, and San Diego County is not exempt from this. The close location of the special use park to the I-5 freeway is only going to make the air quality worse, as pollution drifts and settles into the park, often trapped by air inversion conditions. The report makes this clear when it says that, "...and sites downwind of freeways have elevated concentrations in the first 500 feet" (Part 3, page3.3-19). This will then elevate concentrations in the next 500 feet. The bareness of the open fields and the inadequate tree screening (Part 2, page21) will worsen the situation.

To say that, "During the hours of park activity, the wind blows away from the site 81 percent of the time, and the period that winds blow toward the site or are calm is 19 percent" (Part 3, page 3.3-19) is

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CITY OF ENCINITAS
CITY CLERK

S16-1

Please see response to comment #S15-12 regarding the use of the term Community Park.

S16-2

The commentator quotes the Air Toxics Risk Evaluation but does not specifically address the sufficiency or adequacy of the analysis in the report and no response is necessary.

S16-3

The commentator states his opinion that meteorological data from the monitoring stations used in the Air Toxics Risk Evaluation is not satisfactory and provides a discussion of weather and wind patterns. Please see response to comments #S15-3 and #S15-4 regarding the use of meteorological data used in the report.

unsupported by data. There is no sustained time period during the average day when the wind is blowing 81% of the time on the Hall property. This is confusing wind blowing with an onshore condition.

Additionally the report totally ignores the important influence of the nearby ocean. The water acts as a huge heat sink and is very slow to heat up and cool down with the changing seasons. The adjacent land mass is exactly the opposite. It heats up and cools down quickly. The result on a daily basis is a reversal of winds from onshore to offshore and back again. This is easily documented. Anyone living in the coastal strip knows this. It also causes a more pronounced seasonal shift from winter to summer and back again. This is responsible for our May gray and June gloom (onshore) in the late spring and our bright sunny days with low humidity (offshore) in the late fall. No data is supplied that show that 24-hours-a-day, 365-days-a-year the wind blows toward the site 81% of the time.

Greenhouse Gas Emissions

The California Global Warming Solutions Act requires a reduction of greenhouse gas emissions to 1990 levels by the year 2020 (Part 4, page 5-14). The city of Encinitas is not exempt from this in its capital projects. The city seems to be operating under the "Business As Usual (BAU) scenario (Part 4, page 5-24). This means continuing with the intensifying greenhouse gas emissions under the status quo and not fully implementing Federal and State Mandates and not fully implementing Mitigation Measures (Part 4, page 5-25). The city seems to think that it can get away without doing its appropriate share of reduction. Will other cities in the state be responsible for Encinitas' share? Will Encinitas be so generous as to be responsible for others' share?

The report states "... that the project does not include any measures or features that would reduce the level of Average Daily Trips and Vehicle Miles Traveled associated with the project..." (Part 4, page 5-26). It also assumes that "residents will be able to drive shorter distances and/or walk or bike to access park and recreational facilities," yet admits that this cannot be accurately quantified (Part 4, page 5-27). It is much more likely that the high activity levels planned for the park will do just the opposite and actually create a large number of additional trips and miles driven.

The report says, "There are no feasible mitigation measures through which the proposed project could bring about a substantial reduction in ADTs, VMT, or fuel consumption, or increase the use of alternative transportation modes for project-related trips. In other words vehicle trip-related GHG emissions are largely beyond the control of the proposed project" (Part 4, page 5-41). And this is with 89% of the emissions the result of project-generated trips. Obviously it is the project itself generating the gases, and it is certainly within the control of the project to make modifications to reduce admissions. To say it is "beyond control of the proposed project" is nonsense and contrary to the California Global Solutions Act. The act requires just the sort of modifications that the city says it cannot do, but is very easily doable. This "Business as Usual" (BAU) scenario is not allowed here.

S16-4

The commentor correctly states that the California Global Warming Solutions Act (ACT) required a reduction of greenhouse gas (GHG) emissions to 1990 levels by the year 2020. However, the comment that the City's capital projects are not exempt from the Act is incorrect. The Act does not establish any requirements on local jurisdictions in the state, including the City. Under the Act, the California Air Resources Board (ARB) must develop a Scoping Plan to lower the state's greenhouse gas emissions to meet the 2020 limit. A Draft Scoping Plan proposing a comprehensive set of actions to reduce overall greenhouse gas emission was released in June 2008; approval of a final Scoping Plan is anticipated in November 2008. Once the Scoping Plan is approved, the state has two years to develop and adopt regulations to implement the Plan. It is not known at this time whether any of the regulations adopted in the future will establish requirements on local jurisdictions, including the City and its capital improvements.

The federal and state mandates referenced in the EIR do not impose requirements on the City of Encinitas. Therefore, the comment that the City is not fully implementing federal and state mandates is incorrect. In addition, the City would be required to ensure implementation of the climate change mitigation measures imposed on the proposed project in the EIR upon adoption of the mitigation monitoring and reporting program for the proposed project. Therefore, the comment that the City is not fully implementing mitigation measures is not valid.

The commentor expresses his opinion that the City is not doing its fair share of greenhouse gas emission reductions, but does not specifically address the sufficiency or adequacy of the analysis in the report and no additional response is necessary. Section 5 of the Final EIR addresses the project's impacts on global warming and concludes that the impacts would be less than significant.

S16-5

The commentor disagrees with the conclusion that residents will not have to travel as far to access recreational facilities with implementation of the proposed project. While there is a high activity level planned for the park, residents of Encinitas who currently travel to other communities to access these types of recreational facilities would be able to use the new park in their community, reducing their required travel. All information regarding trip generation from the proposed project is included in the Traffic Analysis prepared for the EIR and the Greenhouse Gas Emissions analysis utilizes those traffic volumes.

S16-6

The commentor opines that the California Global Warming Solutions Act (ACT) requires the project to make modifications to reduce greenhouse gas emissions. As detailed in the response to comment #S16-4, the Act does not impose any requirements on the City. However, CEQA requires that an EIR describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines Section 15126.4). The City has evaluated a series of mitigation measures to minimize the significant climate change impacts of the proposed project and concluded that there are no feasible mitigation measures through which the proposed project could bring about a substantial reduction in average daily trips, vehicle miles traveled, or fuel consumption, or increase the use of alternative transportation modes for project-related trips.

The Greenhouse Gas Emissions analysis evaluates the project as proposed and recommends mitigation measures that could be implemented, specific to the proposed project as designed, to reduce emissions. The emissions analysis does not evaluate alternatives or modifications to the proposed project design. A discussion of greenhouse gas emissions for each of the seven project alternatives has been added to the Final EIR within the analysis of each alternative in Chapter 7. A less intense alternative that would result in less traffic volumes would reduce transportation generated greenhouse gas emissions as compared to the proposed project. The City Council could decide to approve a less intense project design that would generate less vehicle trips and thus, reduce emissions.

S16-3
cont.

S16-4

S16-5

S16-6

Finally the report deceptively tries to differentiate between transportation and non-transportation emissions (Part 4, page 5-41) by only considering the reductions in non-transportation emissions. It claims a 31% reduction of gas emissions will result (close to the 28.8% required), therefore mitigated below the level of significance. Yet the major portion of greenhouse gas emission has been left for someone else to mitigate. The city has ignored its responsibility under the law. Additionally the city cannot claim reductions realized elsewhere all for itself, except on a shared per capita basis. Otherwise, other cities will want Encinitas to be responsible for their own gas emissions.

S16-7

Health Risk Assessments

Neither the City of Encinitas nor the San Diego County Department of Environmental Health has the resources to adequately evaluate health risks. The case should be referred to the Department of Toxics Substances Control. Please see enclosed letter.

S16-8

Gerald W. Sodomka

105 Mozart Avenue

Cardiff by the Sea, Ca 92007



S16-7

The commentor is correct in stating that the analysis separates transportation and non-transportation related emissions. As described in response to comment #S16-6, the analysis did not evaluate emission reductions through project redesign or less intense alternatives. For this reason, there are not feasible methods to reduce vehicle trip generation to the park; rather the analysis presents non-transportation related mitigation measures that can be implemented as part of the current park design. As described in response to comment #S16-6, a discussion of greenhouse gas emissions for each project alternative has been added to the Final EIR in Chapter 7. A less intense alternative that would result in less traffic volumes would reduce transportation generated greenhouse gas emissions as compared to the proposed project.

S16-8

The commentor expresses his option that the County DEH and City of Encinitas cannot adequately review health risks and recommends referral of the project to DTSC. Please see the comment letter received from the DTSC, included as letter S2. In addition, the Voluntary Assistance Program (VAP) application that was submitted to DEH is required to be forwarded to DTSC to determine if they would like to take regulatory oversight of the project. This process was followed and DTSC did not take regulatory oversight of the project. The form returned by DTSC has been included at the end of Appendix H to the EIR.

The enclosed letter the commentor refers to is a letter prepared by SWAPE that was sent directly to DTSC and is included as comment letter S5. It should be noted that DTSC has been consulted by the DEH, see response to comment #B3-4. DTSC did not request regulatory oversight of the proposed project. A comment letter from DTSC regarding the project has been received by the City and is included in the response to comments to the supplemental information packet that was circulated for public review and is numbered as comment letter S2.

PETER STERN
1232 RUBENSTEIN AVE.
CARDIFF, CA. 92007-2408
760-944-9355



June 13, 2008

Planning & Building Department
City of Encinitas
505 S. Vulcan Ave.
Encinitas, Ca. 92024

FAXED

Re: Hall Property Park
Case: 04-197 MUP/CDP/EIR

Dear Planning & Building Department:

With regard to the above application and EIR I have the following comments and concerns.

LIGHTING

As the report indicates the park is contemplated to be lit until 10:00 pm. This is entirely unsatisfactory. As the EIR indicates, the use of the light will result in *significant impact* to the adjacent homes at the northwest portion of the park. This light pollution is no less noxious than sewage, noise or other pollutants. As such the park cannot and should not be lit. There are other lighted parks for nighttime play in our community- specifically, the Lake Street Sports Park and the Ecker YMCA. These are adequate for night play and additional neighborhoods should not be polluted (and distressed) for the sake of sport enthusiasts. Moreover, the EIR suggests that the Parks Department can/should monitor and correct the light pollution which is ridiculous. The Parks Department does not have the experience, expertise or staff to adequately measure, correct and adjust this light pollution situation. Consider if this light pollution was sewage instead. Would this consultant recommend that the Parks Department monitor and later recommend mitigation to sewage seeping onto homeowners land? I think not. Light pollution can be more insidious than other forms of pollution as it will reflect off of the marine layer common along the coast and reflect far beyond the 48 acres of the Park distressing enormous areas, vistas, neighborhoods, and quality of life. Under only very special "holiday" circumstances should the Park be lit at night. The Hall Park must be dark to dusk.

S17-1

S17-2

S17-3

SANTA FE DRIVE

The report contemplates entry from Santa Fe Drive. This is untenable in light of the pending Hospital expansion and the Santa Fe Plaza. The report concedes that to mitigate traffic eventually two or three traffic lights or roundabouts will have to be installed between the current roundabout on Santa Fe Drive and the Freeway entry. This space is approximately 1/3 mile long. To have multiple roundabouts in the space of less than 1/2 mile will render Santa Fe Drive unusable. This is unacceptable. The City need look no farther than the situation on Rancho Santa Fe Road, where the installation of five stop signs to calm traffic has rendered the street unbearable given the traffic which now uses the road. We must learn from our experiences- not everything works; and, sometimes unintended consequences overwhelm the best of

S17-4

S17-1

The commentor expresses opposition to the proposed athletic field light. This comment does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet.

S17-2

It is correct that the Parks and Recreation Department is responsible for implementation of the Mitigation Measure Visual-1 to monitor and adjust park lighting. The EIR states that the Parks and Recreation Department may arrange for other professionals to carry out the mitigation requirements if appropriate. The Parks and Recreation Department is aware of this commitment and has agreed to accept responsibility to ensure the required measurements, monitoring, and adjustments are completed.

S17-3

The commentor expresses the seriousness of light pollution. This comment does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet.

S17-4

The project Traffic Analysis lists two options for mitigation at both the I-5 ramps and alley intersections on Santa Fe Drive, signalization or roundabouts. Tables 17-14 & 17-16 of the Traffic Analysis show that LOS C or better operations are calculated with either mitigation option. The mitigation options do not compel the City/Caltrans to only build roundabouts. Mitigation of installing All-Way stops is not recommended and therefore a comparison to the situation on Rancho Santa Fe Road is invalid.

intentions. Similarly, an alternative way into the park must be determined so as not to "shut down" Santa Fe Drive during park usage. Also note the experience at the Polo Grounds in Del Mar during soccer weekends- disastrous. The language that the EIR uses is "significant impact," for the Santa Fe Drive and alley. To the neighborhood, words like "disaster," "impassable," and "ruinous" are more appropriate, fair and should be recognized as the situation which is in fact unacceptable. Technical analysis is entirely unsatisfactory to express the distress to neighborhood and families that live in this area. Alternative access to the Park should/must be developed.

Thank you in advance for considering my thoughts and I sincerely hope that the Planning & Building Department will incorporate my suggestions into a final Plan.

Cordially,

Peter Stern

S17-4
cont.

S17-5

S17-6

S17-5

"Significant Impact" is a CEQA term that is appropriate to use in an environmental document. A second entrance via MacKinnon Avenue is included as part of the project.

S17-6

The commentor thanks the City, but does not include any specific comments on the environmental analysis contained within the EIR or supplemental information packet; therefore, no response is necessary.

Scott Vurbeff

From: Teresa Barth
Sent: Monday, June 16, 2008 9:19 AM
To: council
Cc: Scott Vurbeff
Subject: FW: Night lighting at the Hall Property

Forwarded to you at the sender's requests.

Teresa Barth
Councilmember
City of Encinitas
760-633-2620

Correspondents should be aware that all communications to or from this address are subject to public disclosure and may be reviewed by third parties.

-----Original Message-----

From: D&SThompson [mailto:dstcardiff@cox.net]
Sent: Wednesday, June 11, 2008 9:39 PM
To: Teresa Barth
Subject: Night lighting at the Hall Property

Hi Teresa,

I am really concerned about many issues at the Hall Property but the most significant one is the night lighting. Do you think any of the Council members are aware there now appears to be a very definite link between breast cancer and exposure to lights at night? You can get more information by doing a Google search on "night lighting and breast cancer." The current scientific research points to a strong correlation and I think we will see future research substantiate it even more dramatically. This is clearly a potential health issue for many women who live in the area of the Hall property. I think you will be amazed at what the medical research community is now discovering regarding this issue and I hope you will be so kind to share/forward this information with your fellow council members.

S18-1

Thanks, Teresa, I think you are doing a great job and I appreciate the service you are providing our community!

Debbie Thompson

S18-1

The commentor is correct that there are studies published that correlate night lighting and increased risk of breast cancer. Scientists suspect that melatonin is a key factor in this correlation as it helps prevent tumor formation. The body produces melatonin primarily at night, and levels drop sharply in the presence of light, especially light in the blue part of the spectrum produced in quantity by computer screens and fluorescent bulbs (Lights at Night Are Linked to Breast Cancer, Rick Weiss, Washington Post, February 20, 2008). Studies also indicate that women who work night shifts have higher rates of breast cancer.

The proposed athletic field lighting for the park would be shut off at 10pm and the remainder of night hours would not have nighttime lighting generated by the proposed athletic field lighting. As detailed in the lighting study for the park project, the athletic field lights proposed are shielded and very directional, resulting in minimal spillover or light trespass and mitigation is included in the EIR to reduce any lighting impacts to the adjacent residential neighborhoods (Mitigation Measure Visual-1). In addition, the studies indicate that the type of lighting that may reduce melatonin production is typical of those light sources that people have in their homes including computers screens and fluorescent light bulbs. It is likely that residents would use these in-home light sources beyond the 10pm shutoff of the park's athletic field lights.

These comments will be provided to the city's decision-makers for consideration when they take action on the proposed project.

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