



Response to Comments
Final Environmental Impact Report for the
Balboa Park Plaza de Panama Project

Project No. 233958
SCH No. 2011031074

May 3, 2012



THE CITY OF SAN DIEGO

BALBOA PARK PLAZA DE PANAMA PROJECT

Response to Comments

The Draft Environmental Impact Report (EIR) public review period was January 23, 2012 to March 8, 2012. Several requests to extend the public review were received, and the public review period was extended to March 22, 2012. During this period, 197 comment letters were received from agencies, organizations, and individuals. A copy of each comment letter is included in the Final EIR along with corresponding responses.

Letters are arranged by commenter type, with agency comments first, organization comments second, and individual comments third. Within those groups, comment letters are arranged alphabetically. Each comment letter is assigned an alphabetic letter and each comment is assigned a number.

As part of the Notice of Preparation (NOP) process, the City solicited alternatives for inclusion in the EIR. Based on this public input, the EIR fully addressed 13 alternatives and considered but rejected an additional 8 alternatives. Thus, the City provided consideration of a reasonable range of alternatives, including those suggested by the public. In some instances, the alternatives suggested by the public did not contain detailed descriptions or certain aspects were ambiguous; therefore, certain assumptions were made and identified in the alternatives analysis. In other instances, modifications were made to alternatives suggested by the public in order to ensure that the EIR included a reasonable range of alternatives.

During public review of the Draft EIR, several commenters suggested additional alternatives or modifications to alternatives. These new/modified alternatives were reviewed in light of the California Environmental Quality Act (CEQA) Guidelines to determine how to address these alternatives. First it was necessary to determine whether the suggested alternative would add to the reasonable range of alternatives already addressed in the EIR. Factors considered in this determination included:

- Whether the alternative would avoid or substantially lessen or significant impacts of the project.
- Whether the alternative addresses issues that are not addressed by other alternatives.
- Whether the alternative would feasibly attain most of the basic objectives of the project.

If the new/modified alternative did not meet these criteria, it was determined that it would not add to the reasonable range of alternatives already addressed in the EIR and need not be addressed in full detail. However, consideration of the potential impacts of the new/modified alternative was given to the extent that it would reduce or increase impacts compared to the proposed project in order to provide information for the decision makers and the public.

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BALBOA PARK PLAZA DE PANAMA PROJECT

Letters of Comment and Responses

Letters of comment to the Draft EIR were received from the following agencies, organizations, and individuals. Several comment letters received during the Draft EIR public review period contained accepted revisions that resulted in changes to the final EIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

State and Federal Agencies

| | | |
|---|---|--------|
| A | State Clearinghouse..... | RTC-7 |
| B | Native American Heritage Commission..... | RTC-9 |
| C | California Department of Transportation..... | RTC-12 |
| D | California Department of Fish and Game..... | RTC-14 |
| E | Department of Toxic Substances Control..... | RTC-20 |
| F | Office of Historic Preservation, Department of Parks and Recreation | RTC-22 |

Organizations

| | | |
|----|--|---------|
| G | Bellefontaine Condominium Association..... | RTC-27 |
| H | Balboa Park Cultural Partnership | RTC-28 |
| I | Balboa Park/Morley Field Recreation Council..... | RTC-29 |
| J | The Committee of One Hundred | RTC-30 |
| K | Citizens Coordinate For Century 3..... | RTC-31 |
| L | Downtown San Diego Partnership | RTC-48 |
| M | Greater Golden Hill Planning Committee | RTC-49 |
| N | League of Women Voters of San Diego..... | RTC-50 |
| O | Mingei International Museum | RTC-53 |
| P | Museum of Man..... | RTC-54 |
| Q | National Trust Historic Preservation..... | RTC-56 |
| R | North Park Historical Society..... | RTC-59 |
| S | North Park Planning Committee..... | RTC-78 |
| T | Plumbing-Heating-Cooling Contractors Association of San Diego..... | RTC-109 |
| U | Reuben H. Fleet Science Center..... | RTC-110 |
| V | San Diego Air Space Museum | RTC-112 |
| W | San Diego Convention and Visitors Bureau | RTC-113 |
| X | San Diego Natural History Museum | RTC-114 |
| Y | Save Our Heritage Organization | RTC-116 |
| Z | Timken Museum of Art..... | RTC-126 |
| AA | Zoological Society of San Diego | RTC-128 |

Individuals

AB George AdamsRTC-133
AC George AdamsRTC-134
AD Plaza de Panama Committee Form Letter Signed by:RTC-135

- | | |
|---------------------------|---------------------------|
| Amina Adan | Ahmed A Malinomar |
| Leo Alcala | Jill Maslac |
| Machel Allen | Sharon Mayer |
| Amy | William Mayer |
| John Arvin | Agnieszka Melfi |
| Anthony Baldman | Christopher Mordy |
| Susan Barrera | Larry Murnane |
| Paul Beard | Christopher Alan Murphy |
| Whitney Benzian | Jim Neri |
| Karen Berger | Paul Nierman |
| Toni Bloomberg | Leann Ortmann |
| Amy Baker Bridge | Bruce Pastor, Jr. |
| Stephen Bushue | Mark and Linda Pennington |
| Duke and Yolanda Campbell | Gary Phillips |
| Maria Cortez | Richard E. Preuss |
| Andy Dillavou | Rob Quigley |
| Lorrain Duffy | Alex Rivera |
| Katherine A.W. Eaton | Steve Rivera |
| Bjorn Endresen | Les Romack |
| Tim Erickson | William N. Rowley |
| Jeff Fargo | Franklin Roxas |
| Mathieu Gregoire | Chris Ruiz |
| William Hamilton | William H. Sauls |
| Bruce Heimburg | Douglas Scott |
| Thomas Hemlock | Larry Segal |
| Kim Herbstritt | Jay Shumaker |
| Barbara L. Hernly | John Silcox |
| Kipland Howard | Mike Singleton |
| Eric Johnson | Ronald Sinnen |
| Donna Jones | Jenna Spagnolo |
| Michael S. Kingsley | Kevin Swanson |
| Jeff Larabee | William V. Trask |
| Stan Lattimore | Adrienne Turner |
| Dr. Kristine Hall Laverty | Michael C. Vincent |
| Marsha Lyon | Mat Wahlstrom |
| Robin Madaffer | |

AE Richard C. AtkinsonRTC-146
AF Arthur BallantyneRTC-147
AG Richard BazenRTC-154
AH Paul BlackRTC-196
AI Peter BridgeRTC-197
AJ Ron BuckleyRTC-198

| | | |
|----|---------------------------------|---------|
| AK | John and Frances Castle | RTC-201 |
| AL | William G. "Jay" Coffman | RTC-203 |
| AM | Kyle Colley | RTC-211 |
| AN | Michael Curtis | RTC-212 |
| AO | Norm DeWitt | RTC-213 |
| AP | Alan Francisco | RTC-214 |
| AQ | Sharon Gehl | RTC-215 |
| AR | Vance A. Gustafson | RTC-216 |
| AS | Allen Anthony Hazard | RTC-217 |
| AT | Thomas Hemlock | RTC-218 |
| AU | Bernadine King | RTC-221 |
| AV | William S. Lewis | RTC-224 |
| AW | Dennis Lusic | RTC-227 |
| AX | Sylvia Naliboff | RTC-228 |
| AY | Richard Nelson | RTC-229 |
| AZ | Travis Newhouse | RTC-230 |
| BA | Elvi Olesen | RTC-231 |
| BB | Mark and Linda Pennington | RTC-232 |
| BC | Donna Posin | RTC-233 |
| BD | HC Jay Powell | RTC-234 |
| BE | Elaine Regan | RTC-235 |
| BF | Scott L. Sandel | RTC-236 |
| BG | Douglas Scott | RTC-242 |
| BH | Larry Segal | RTC-243 |
| BI | Jay Shumaker | RTC-244 |
| BJ | John Silcox | RTC-250 |
| BK | Mike Singleton | RTC-251 |
| BL | Ronald Sinnen | RTC-258 |
| BM | Jenna Spagnolo | RTC-259 |
| BN | Kevin Swanson | RTC-262 |
| BO | William V. Trask | RTC-266 |
| BP | Adrienne Turner | RTC-268 |
| BQ | Michael C. Vincent | RTC-271 |
| BR | Mat Wahlstrom | RTC-272 |
| BS | John Wotzka | RTC-275 |
| BT | John Ziebarth | RTC-276 |
| BU | Jim Ziegler | RTC-292 |

BV Petition Signed by:RTC-293

Charles Adair
C.J. Anderson-Wu
Wendy Tinsley Becker
Kathleen Blavatt
Ernestine Bonn
Dionne Carlson
Glen Carlson
Ashley Christensen
David Cohen
Alana Coons
Bruce Coons
Bret Daguio
Roberto de Biase
John Eisenhart
Susan Floyd
Alan Francisco
Ann Garwood
Jesus Gerardo
James Gilhooly
Igor Goldking
Richard Gorin
Ruth Hayeard
Amy Hoffman
Ann Jarmusch
Marita Johnson
Irma Jones

Welton Jones
David Krimmel
John Lomac
Lukas Martinelli
Adrienne Martinez
Gregory May
Ronald May
Vonn Marie May
Patrick McArron
Pamela Miller
Nancy Moors
Geoff Page
Deborah Pettry
Julia Quinn
David Raines
Richard Ross
Nancy Sands
Doug Scott
Dan Soderberg
Ione Stiegler
David Swarens
Ian Trowbridge
Elizabeth Weems
Linda Wilson
Sandra Wilson
Frances O'Neill Zimmerman

Letter A



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

March 8, 2012

Elizabeth Shearer-Nguyen
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Subject: Balboa Park Plaza De Panama/233958
SCH#: 2011031074

Dear Elizabeth Shearer-Nguyen:

A-1

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 March 7, 2012, 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,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1

Comment noted.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011031074
Project Title Balboa Park Plaza De Panama/233958
Lead Agency San Diego, City of

Type EIR Draft EIR

Description Implement the Balboa Park Plaza de Panama Project. Project goals include rehabilitation of the Plaza de Panama consistent with the original vision of a ceremonial plaza and gathering space by eliminating vehicle traffic from Plaza de California, El Prado, Plaza de Panama, and the Esplanade. Project elements include:
1. Plaza de Panama
2. El Prado and Plaza de California
3. Bypass Road and Bridge
4. Alcazar Parking Lot and Walkway
5. Esplanade & Pan American Road
6. Parking Structure and Roof-top Park

Lead Agency Contact

Name Elizabeth Shearer-Nguyen
Agency City of San Diego
Phone (619) 446-5369 **Fax**
email
Address 1222 First Avenue, MS-501
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City
Region
Lat / Long
Cross Streets El Parado and Plaza de Panama
Parcel No. 534-450-0800
Township **Range** **Section** **Base**

Proximity to:

Highways SR 163
Airports San Diego Int'l
Railways
Waterways
Schools Roosevelt MS, San Diego HS, San Diego City College
Land Use

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Public Services; Solid Waste; Vegetation; Water Quality; Wildlife; Landuse; Traffic/Circulation

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 01/23/2012 **Start of Review** 01/23/2012 **End of Review** 03/07/2012

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

Letter B

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 855-8251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

clear
3/7/12
e



January 31, 2012

Ms. Elizabeth Shearer-Nguyen

City of San Diego Development Services Department

1222 First Avenue, MS-501
San Diego, CA 92101

Re: SCH#2011031074 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Balboa Park Plaza de Panama Project;" located in Balboa Park; City of San Diego; San Diego County, California

Dear Ms. Shearer-Nguyen:

B-1

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) 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 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.

B-2

The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were not identified** within the project area identified. Also, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction. The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC

B-1

Comment noted.

B-2

This comment is consistent with Section 4.2 analysis.

LETTER

RESPONSE

Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

B-3 Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

B-4 Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties pursuant to CA Public Resources Code §5097.95. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

B-5 Consultation with tribes and interested Native American consulting parties, on the NAHC list, if the project is under federal jurisdiction, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq*. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

B-6 Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

B-7 Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be

B-3 Native American tribes were included on the Notice of Preparation and Public Review distribution (see the Conclusions for the distribution list). As no response has been received from the Native American tribes contacted to date, additional consultation letters were sent to all 16 tribes per attached list on April 3, 2012. It is also noted that Clint Linton, representing the Ipai Nation of Santa Ysabel, consulted with the project archaeologist during site surveys (see Appendix B-2).

B-4 See response to comment B-3. As discussed in Section 4.2.3.1 no significant resources were identified at the project site. Since there is a possibility that unknown subsurface resources could be disturbed during grading activities, mitigation measure HR-1 is proposed. The individual actions making up HR-1 assure the recording and recovery of important historical and/or prehistorical information which may otherwise be lost during construction of the proposed project. The requirement for an archaeological and a Native American monitor to be present for all grading activities, along with specified processes, assures that grading would be halted or diverted should any discovery be made until appropriate steps to preserve and/or otherwise record the discovery has been completed.

B-5 The proposed project does not include a federal action necessitating consultation in compliance with the National Environmental Policy Act (NEPA). The project is subject to review under California Environmental Quality Act (CEQA), which includes all applicable sections in the Statutes and Guidelines relating specifically to historical and Native American resources.

Section 4.2 provides the historic context and cultural landscape, and discusses the application of the Secretary of the Interior Standards to the project.

B-6 Comment noted.

B-7 Should any human remains be encountered during the archaeological monitoring program or any other activities, the California Public Resources Code (Section 5097.98) and Health and Safety Code (Section 7050.5) shall be followed. Mitigation Measure HR-1, as detailed in Section 4.2.3.3, provides specific steps which are required to assure the appropriate treatment of Native American human remains, if discovered during construction activities.

LETTER

RESPONSE

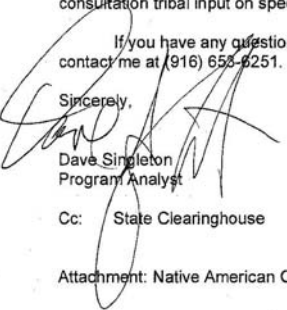
followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

B-8

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 658-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

B-8 Comment noted. See response to comment B-4.

Letter C

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN, Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST., M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

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www.dot.ca.gov



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March 22, 2012

11-SD-163
PM 1.41
Balboa Park Plaza de Panama
DEIR
SCH# 2011031074

Ms. Elizabeth Shearer-Nguyen
City of San Diego
Development Services Department
1222 First Avenue, MS-501
San Diego, CA 92101

Dear Ms. Shearer-Nguyen:

C-1 The California Department of Transportation (Caltrans) received a copy of the Draft Environmental Impact Report (DEIR) for the proposed Balboa Park Plaza de Panama project located near State Route 163 (SR-163). Caltrans and the City of San Diego have been in coordination on this project. Based on these coordination efforts and Caltrans review of the EIR, we have the following comments:

It is recommended that the Balboa Park Plaza de Panama project coordinate with Caltrans regarding the seismic retrofit to the Laurel Street Overcrossing and the State Transportation Improvement Program Transportation Enhancement (STIP TE) Balboa Park historic preservation projects as it relates to the bypass bridge alternative construction. Please contact Caltrans Project Manager Lou Melendez at (619) 688-3328 for more information.

C-2 Construction access is proposed from SR-163. Encroachments within the access control lines of Freeways and Expressways will require review and approval by Caltrans for an Encroachment Permit. As mentioned in previous discussions, as part of the Encroachment Permit application, additional justification is needed, as this is considered a longitudinal encroachment which requires approval by Caltrans Headquarters in Sacramento. If access to SR-163 is granted, the longitudinal encroachment permit may place time constraints on work and require lane closures in order to minimize traveler effects on SR-163. It must be clearly demonstrated that the accommodation will not adversely affect highway safety and traffic operations, as well as a full explanation of other potential options to the proposed encroachment, and how such options cannot be implemented at a reasonable cost and the consequences if the requested encroachment is not approved.

"Caltrans improves mobility across California"

C-1 The recommended coordination with Caltrans is ongoing.

C-2 It is acknowledged that an Encroachment Permit will be required for construction access from SR-163. The applicant will coordinate with Caltrans to provide all appropriate information through the application process.

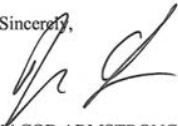
LETTER

RESPONSE

Elizabeth Shearer-Nguyen
March 22, 2012
Page 2

C-3 Caltrans appreciates the opportunity to review the DEIR and will continue close coordination efforts with the City. If you have any specific questions regarding the comments Caltrans has provided, please contact Marisa Hampton of the Development Review Branch at (619) 688-6954.

Sincerely,



JACOB ARMSTRONG
Development Review Branch Chief

c: Bill Figge, Acting District Director, Caltrans District 11
Ross Cather, Deputy District Director Program/Project Management, Caltrans District 11
Marisa Hampton, Transportation Planner, Caltrans District 11
Lou Melendez, Project Manager, Caltrans District 11

"Caltrans improves mobility across California"

C-3 Comment noted.

Letter D



State of California -The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
<http://www.dfg.ca.gov>

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



March 1, 2012

Ms. Elizabeth Shearer-Nguyen
City of San Diego, Development Services Department
1222 First Avenue, MS-501
San Diego, CA 92101

Subject: Comments on the Draft Environmental Impact Report for Balboa Park Plaza de Panama Project, San Diego, San Diego County, CA (SCH# 2011031074)

Dear Ms. Shearer-Nguyen:

D-1

The California Department of Fish and Game (Department) has reviewed the draft Environmental Impact Report (DEIR) dated January 23, 2012, for the Balboa Park Plaza de Panama Project. The comments provided herein are based on information provided in the DEIR and associated documents (including the Biological Resources Survey Report prepared by RECON, dated January 12, 2012), our knowledge of sensitive and declining vegetation communities in the County of San Diego, and our participation in regional conservation planning efforts.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15281, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (Fish and Game Code § 2050 et seq.) and other sections of the Fish and Game Code (1600 et seq.). The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

The proposed Balboa Park Plaza de Panama project site is within the City of San Diego, 5.6 miles east of the Pacific Ocean, 1.5 miles northeast of San Diego Bay, 13 miles north of the United States/Mexico border, and immediately northeast of downtown San Diego. Balboa Park (Park) is generally bounded by 26th Street to the east, 6th Avenue to the west, Upas Street to the north, and Russ Boulevard to the south. The Park is characterized by a variety of landforms including vegetated canyons, ornamental gardens, open spaces, and developed areas. The project site is within a 15.4 acre area centrally located in the Central Mesa area of the Park; much of the Central Mesa is a designated National Historic Landmark and is home to a number of cultural amenities and attractions including El Prado, the Plaza de Panama, and Pan American Road.

The project includes rehabilitation of the Plaza de Panama consistent with early design of a ceremonial plaza and gathering space. It would accomplish this through elimination of automobile traffic and parking from the Plaza de Panama and adjacent promenades. Construction of a two-way elevated road at the east end of the Cabrillo Bridge that continues past the Museum of Man would reroute vehicle traffic west of Pan American Road to a new subsurface three-level parking structure. The structure would be built where the Organ Pavilion surface lot is currently located and would have a 2.2 acre rooftop park. The adjacent Alcazar

Conserving California's Wildlife Since 1870

D-1

The California Department of Fish and Game's role is a Trustee Agency. This has been clarified in Final EIR Section 1.2.2.

By means of clarification, and as expressed in Section 2.1, Balboa Park is generally bounded by 28th Street to the east and Sixth Avenue to the west.

Ms. Elizabeth Shearer-Nguyen
March 1, 2012
Page 2 of 4

parking lot would be redesigned to improve accessible parking as well as passenger drop-off, museum loading, and valet.

The Arizona Street Landfill (located east of Balboa Park) is an off-site project component which would serve as the disposal site for the soil export generated through construction of the Organ Pavilion parking structure. The Arizona Street Landfill is an inactive landfill equipped with a landfill gas collection system and flare station. Land uses are restricted because of a lack of formal closure, irregular settlement of the ground surface, and past problems with methane generation; however, the City's Parks and Recreation Department utilizes a portion of the landfill for maintenance sheds and equipment storage. The second off-site project component is a temporary access road within Cabrillo Canyon. Adjacent to SR-163, it would be utilized during construction of the elevated road's abutments and piers.

D-2 There are several biological resources issues (both on- and off-site) to the Department. The Plaza de Panama is a mosaic of developed and green open spaces with landscaped ornamental vegetation, while the area underneath and adjacent to the Cabrillo Bridge consists of eucalyptus woodland. Areas along the bridge could serve as roosting area for colonial bats, while eucalyptus woodland has the potential to support nesting birds and tree-dwelling bat species. The Arizona Street Landfill area is comprised of non-native grassland and disturbed land (potentially serving as raptor foraging habitat), and is adjacent to the City's Multi-Habitat Planning Area (MHPA). The MHPA to the northwest of the landfill contains several habitat types, of which the most dominant is coastal sage scrub (CSS). CSS serves as nesting and foraging habitat for coastal California gnatcatcher (*Poliotilia californica californica*; Federally Threatened; State Species of Special Concern). No species-specific surveys were conducted according to the Biological Resources Survey Report.

D-3 We offer the following comments and recommendations to the assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts.

1. The DEIR neither adequately addresses potential for colonies of roosting bats under the Cabrillo Bridge, nor the potential for tree dwelling species in areas designated for vegetation clearing and grading. In evaluating potential biological resources that may be present within the project footprint, the Department reviewed the California Natural Diversity Database (CNDDDB). The CNDDDB was used as the primary source to identify previously reported occurrences of special species and sensitive habitats in the project vicinity. This database is a statewide inventory, managed by the Department, and is routinely updated with the location and condition of the state's rare and declining species and habitats. The CNDDDB records indicate that there is the potential for Mexican long-tongued bat (*Choeronycteris mexicana*; State Species of Special Concern), pocketed free-tailed bat (*Nyctinomops femorosaccus*; State Species of Special Concern), western red bat (*Lasiurus blossevillii*; State Species of Special Concern), and hoary bat (*Lasiurus cinereus*) to occur within proximity to the project area. Although the CNDDDB is the most current and reliable tool for tracking occurrences of special status species, it contains only those records that have been reported to the Department. Data in the CNDDDB were supplemented by independent data provided by Drew Stokes, resident chiropteran biologist for the San Diego Natural History Museum, which further support a conclusion that these species may be present. The Department requests a focused survey be conducted in accordance with the City's Guidelines for Conducting Biology Surveys (Table 1) to address the aforementioned wildlife concerns. Completed survey results should be included in the biological technical appendices for the final EIR (FEIR). The Department would appreciate a supplemental copy of the completed survey results.

D-2 Comment noted.

D-3 Section 4.6.1.2 identifies that sensitive species with potential to occur are addressed in the biological technical letter report (see Appendix F). The potential to occur analysis in the biological technical letter report (see Attachment 4 of Appendix F) was developed based on the California Natural Diversity Database (CNDDDB) and included bat species. The following three sensitive bat species were identified in the biological technical report letter as having a low potential to occur within the project site: Mexican long-tongued bat (*Choeronycteris Mexicana*), pocketed free-tailed bat (*Nyctinomops femororsaccus*), and big free-tailed bat (*Nyctinomops macrotis*). All three of these species are California species of special concern.

In response to this comment, a RECON biologist, accompanied by resident bat (chiropteran) biologist for the San Diego Natural History Museum, conducted a second site visit on April 5, 2012 to complete an additional bat habitat assessment analysis. The following is a summary of the results of that assessment and consultation.

It was determined that three areas that required additional bat habitat assessment: (1) the eastern portion of the Cabrillo Bridge at the expansion joint, (2) bridge abutment and buildings at the east end of the bridge, and (3) the palm trees with intact dead palm frond 'skirts'. It was determined that the eucalyptus and other foliage in the project area would not provide suitable roosting habitat for bats.

The expansion joint in the eastern Cabrillo Bridge arch would potentially provide roosting habitat for bats, but this portion of the bridge is outside of the project impact area.

The eastern end of the bridge and associated buildings contained no sign of historic or current bat use. Thus, no impact to bats at this location is anticipated.

The palms were visually investigated and anabat was used to record echolocation calls adjacent to the skirted palms within the project area near the Cabrillo Bridge. After reviewing the recorded bat calls, it was determined that the calls to be that of the hoary bat (*Lasiurus cinereus*), a tree/foliage roosting species. While this species may use the palms on-site for roosting, it is not considered sensitive.

LETTER

RESPONSE

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| | <p>D-3 (cont.):</p> <p>The pocketed free-tailed bat and big free-tailed bat roosting habitat does not exist within the project site. These species typically roost in high cliffs in inland areas. Thus, the project is not anticipated to impact these species.</p> <p>While not observed, and based upon CDFG's comment that the western red bat (<i>Lasiurus blossevillii</i>) is a State Species of Special Concern), there is a potential for the species to roost within the project area. As such, the project has incorporated design features that would ensure avoidance; therefore, no impact would result. The following feature would be assured through a condition of the permit.</p> <ol style="list-style-type: none">1. Prior to the issuance of a grading or construction permit, the following measure shall be implemented to the satisfaction of the Development Services Department: Skirted palm tree removal shall occur outside of the bat roosting (nesting) season (April to September). <p>In addition, the Mexican long-tongued bat (<i>Choeronycteris mexicana</i>), a State Species of Special Concern), has potential to roost in buildings within the project area. As such, the project has incorporated design features that would ensure avoidance; therefore, no impact would result. The following feature would be assured through a condition of the permit.</p> <ol style="list-style-type: none">2. Prior to the issuance of a demolition permit, the following measure shall be implemented to the satisfaction of the Development Services Department: Demolition shall be completed outside of the bat roosting (nesting) season (April to September). <p>The above information has been added to Final EIR Section 4.6, as appropriate.</p> <p>Biological resources mitigation measure BR-1 (requiring pre-construction surveys) is already in place to address the potential for the project to result in indirect or direct impacts during construction to wildlife species that use the eucalyptus or palm trees as bird nesting habitat.</p> |
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Ms. Elizabeth Shearer-Nguyen
March 1, 2012
Page 3 of 4

- D-4 2. While the Department agrees that coastal California gnatcatcher (CAGN) is unlikely to be present within the project footprint, we remain concerned with potential edge effects and indirect impacts to off-site breeding habitat within the MHPA, particularly noise-related impacts associated with proposed construction activities. While the DEIR's Mitigation, Monitoring and Reporting Program (MMRP) element LU-1:LA.8 briefly addresses this issue, the FEIR should identify the specific MMRP measure that will address avoidance and/or minimization of indirect impacts to CAGN pursuant to the City's SAP.
- D-5 3. Location, distribution, and timing of spoils to be deposited at the Arizona Street Landfill are not specified in the DEIR; therefore, potential exists for indirect and cumulative impacts to raptor foraging habitat in non-native grassland within this off-site project component (CEQA Guidelines, §15064(d)). Non-native grasslands in San Diego County provide important foraging areas for raptors and, primarily due to development, raptor foraging areas are rapidly disappearing throughout the County. Although off-site project components at the Arizona Street Landfill do not provide suitable raptor nesting habitat, they do provide a significant area to support raptor foraging (7.01 acres of non-native grassland). The Biological Resources Report documented the occurrence of several raptor species on-site, as well as important raptor prey species California ground squirrel (*Spermophilus beecheyi*). Given the proximity of raptor nesting to the project footprint, we believe suitable foraging habitat exists at the landfill site. Cumulatively, raptor foraging habitat loss may be significant, and impacts to this resource warrant further analysis through incorporation of the following elements into the FEIR:
- D-6 a. Impacts to non-native grassland should be minimized through utilization of the most disturbed habitat types available within the off-site project components. The Biological Resources Report states there is 13.96 acres of disturbed habitat at the Arizona Street Landfill, and the Department supports the use of this habitat type as the environmentally superior alternative for deposition of spoils resulting from the excavation of the Organ Pavilion parking structure.
- D-7 b. A detailed description of location, distribution, and timing of spoils to be deposited and their impacts on raptor foraging in non-native grassland should be included in the biological technical appendices of the FEIR.
- c. In order to assess and minimize indirect impacts to non-native grassland and the adjacent MHPA, a list of species proposed for revegetation of the areas impacted by spoils deposition should also be included, as well as a schedule of anticipated hydroseeding activities should also be included with in the FEIR.
4. Mitigation language provided in MMRP (BR-1) partially addresses impact concerns for resident, migratory and other bird species (e.g., raptors). However, the City's MSCP SAP does not provide take for non-MSCP covered species, including many migratory avian species. In order to comply with sections 3503 and 3503.5 of the Fish and Game Code and to ensure no direct and indirect impacts to active avian nests, construction activities, (including vegetation clearing and grubbing) within or adjacent to avian nesting habitat should occur outside of the avian breeding season which generally runs from March 1 – August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. Additionally, the following measures should be considered for the FEIR:

- D-4 Potential edge effect and indirect impacts to coastal California gnatcatcher breeding habitat within the off-site MHPA area in Florida Canyon are addressed in Sections 4.1 and 4.6. Staff inadvertently omitted the specific mitigation language for coastal California gnatcatcher as part of mitigation measure LU-1. This language has been added to the Final EIR.
- D-5 As indicated Section 4.6.3.2, the project impact to non-native grasslands at the Arizona Street Landfill would not be permanent and, therefore, would not contribute to a cumulative loss of raptor foraging habitat. The existing non-native grassland was established by the Arizona Street Landfill as an erosion control measure and the area disturbed by the project would be revegetated immediately upon completion of earthwork operations via a native, non-invasive hydroseed mix. As indicated in Section 3.0, soil export activities would last approximately 40 days. After revegetation, the Arizona Street Landfill would continue to provide raptor foraging habitat.
- D-6 As indicated in Section 4.6.3.2, impacts to the non-native grassland located on the Arizona Street Landfill are considered less than significant. The non-native grassland habitat located at the Arizona Street Landfill was established via placement of mulch as an erosion control measure (Section 4.6.3). This area would be temporarily impacted by the placement of soil export, but would be hydroseeded per erosion control measures required by Order 97-11 Waste Discharge Requirements for Post-closure Maintenance of Inactive Nonhazardous Waste Landfills in the San Diego Region. Per the City of San Diego CEQA Significance Determination Thresholds (City of San Diego 2011), habitat mitigation is not required for impacts to areas that have been planted for the purpose of erosion control; therefore, no mitigation is required.
- D-7 See response to comments D-5 and D-6. Figure 5b of the Biological Resources Letter Report (see Appendix F) and Figure 4.6-1b of the EIR show the location of non-native grassland habitat and where soil would be deposited within the landfill. As indicated in Section 3.0, soil export activities would last approximately 40 days and hydroseeding would occur upon the completion. Project impacts to raptor foraging would be temporary and less than significant.

Ms. Elizabeth Shearer-Nguyen
 March 1, 2012
 Page 3 of 4

2. While the Department agrees that coastal California gnatcatcher (CAGN) is unlikely to be present within the project footprint, we remain concerned with potential edge effects and indirect impacts to off-site breeding habitat within the MHPA, particularly noise-related impacts associated with proposed construction activities. While the DEIR's Mitigation, Monitoring and Reporting Program (MMRP) element LU-1:1.A.8 briefly addresses this issue, the FEIR should identify the specific MMRP measure that will address avoidance and/or minimization of indirect impacts to CAGN pursuant to the City's SAP.
3. Location, distribution, and timing of spoils to be deposited at the Arizona Street Landfill are not specified in the DEIR; therefore, potential exists for indirect and cumulative impacts to raptor foraging habitat in non-native grassland within this off-site project component (CEQA Guidelines, §15064(d)). Non-native grasslands in San Diego County provide important foraging areas for raptors and, primarily due to development, raptor foraging areas are rapidly disappearing throughout the County. Although off-site project components at the Arizona Street Landfill do not provide suitable raptor nesting habitat, they do provide a significant area to support raptor foraging (7.01 acres of non-native grassland). The Biological Resources Report documented the occurrence of several raptor species on-site, as well as important raptor prey species California ground squirrel (*Spermophilus beecheyi*). Given the proximity of raptor nesting to the project footprint, we believe suitable foraging habitat exists at the landfill site. Cumulatively, raptor foraging habitat loss may be significant, and impacts to this resource warrant further analysis through incorporation of the following elements into the FEIR:
 - a. Impacts to non-native grassland should be minimized through utilization of the most disturbed habitat types available within the off-site project components. The Biological Resources Report states there is 13.96 acres of disturbed habitat at the Arizona Street Landfill, and the Department supports the use of this habitat type as the environmentally superior alternative for deposition of spoils resulting from the excavation of the Organ Pavilion parking structure.
 - b. A detailed description of location, distribution, and timing of spoils to be deposited and their impacts on raptor foraging in non-native grassland should be included in the biological technical appendices of the FEIR.
 - c. In order to assess and minimize indirect impacts to non-native grassland and the adjacent MHPA, a list of species proposed for revegetation of the areas impacted by spoils deposition should also be included, as well as a schedule of anticipated hydroseeding activities should also be included with in the FEIR.
4. Mitigation language provided in MMRP (BR-1) partially addresses impact concerns for resident, migratory and other bird species (e.g., raptors). However, the City's MSCP SAP does not provide take for non-MSCP covered species, including many migratory avian species. In order to comply with sections 3503 and 3503.5 of the Fish and Game Code and to ensure no direct and indirect impacts to active avian nests, construction activities, (including vegetation clearing and grubbing) within or adjacent to avian nesting habitat should occur outside of the avian breeding season which generally runs from March 1 – August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted. Additionally, the following measures should be considered for the FEIR:

D-8 As indicated in the Biological Resource Survey Letter Report (see Appendix F), the hydroseed mix would consist of native non-invasive species. In addition, the project would implement mitigation measure LU-1 that requires the following:

Plant species within 100 feet of the MHPA shall comply with the Landscape Regulations (LDC142.0400 and per table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive. Landscape plans shall include a note that states: The ongoing maintenance requirements of the property owner shall prohibit the use of any planting that are invasive, per City Regulations, Standards, guidelines, etc., within 100 feet of the MHPA.

Thus, impacts to adjacent MHPA habitat would be less than significant.

D-9 Comment noted.

LETTER

RESPONSE

Ms. Elizabeth Shearer-Nguyen
 March 1, 2012
 Page 4 of 5

- D-10 a. The Department recommends the buffer for active raptor nests be 500 feet, as opposed to the 300 foot buffer that is currently proposed.
- D-11 b. If avoidance of the avian breeding season is not feasible (as defined above), the Department recommends that, beginning 30 days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys should continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The project proponent should provide the City with results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.
- D-12 c. If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the City and, upon request, the Department. Based on the submitted information, the City (and the Department, if the Department requests) will determine whether to allow a narrower buffer.
- D-13 d. The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the City during the grubbing and clearing of vegetation, and shall notify the City immediately if project activities damage active avian nests.

D-14 We appreciate the opportunity to comment on the DEIR for this project and to assist the City in further minimizing and mitigating project impacts to biological resources. If you should have any questions or comments regarding this letter please contact Jennifer Edwards at (858) 467-2717 or via email at JEdwards@dfg.ca.gov.

Sincerely,



Stephen M. Juarez
 Environmental Program Manager
 South Coast Region

- D-10 It is the City staff and project biologist's position that the mitigation requirements included in the Final EIR are consistent with the City's Biology Guidelines with respect to buffer requirements for raptors. The survey distances identified in the EIR are adequate and no evidence has been provided that supports expanding the buffer area from 300 feet to 500 feet for this site.
- D-11 See response to comments D-9 and D-10.
- D-12 See response to comments D-9 and D-10.
- D-13 See response to comments D-9 and D-10.
- D-14 Comment noted.

Letter E



Matthew Rodriguez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

March 6, 2012

Ms. Elizabeth Shearer-Nguyen
The City of San Diego Planning Department
1222 First Avenue, MS-501
San Diego, California 92101

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR BALBOA PARK PLAZA
DE PANAMA (SCH# 20111031074)

Dear Ms. Shearer-Nguyen:

E-1

The Department of Toxic Substances Control (DTSC) has received your draft Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "Implement the Balboa Park de Panama Project. Project goals include rehabilitation of the Plaza de Panama consistent with the original vision of a ceremonial plaza and gathering space by eliminating vehicle traffic from Plaza de California, El Prado, Plaza de Panama, and the Esplanade. Project elements include:

1. Plaza de Panama
2. El Prado and Plaza de California
3. Bypass Road and Bridge
4. Alcazar Parking Lot and Walkway
5. Esplanade and Pan American Road
6. Parking Structure and Roof top Park".

DTSC sent you comments on the Notice of Preparation Report for the above-mentioned project on 4/18/2011, which should be addressed. Based on the review of the submitted document DTSC has no further comments.

If you have any questions regarding this letter, please contact me at ashami@dtsc.ca.gov, or by phone at (714) 484-5472.

Sincerely,

Al Shami, Project Manager
Brownfields and Environmental Restoration Program

E-1

The City received DTSC letter dated April 19, 2011 providing comments on the Notice of Preparation (NOP). This letter is included in Appendix A of the EIR. All relevant health and safety/hazardous materials comments received on the NOP are addressed in Section 4.10.

LETTER

RESPONSE

Ms. Elizabeth Shearer-Nguyen
March 6, 2012
Page 2

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
P.O. Box 806
Sacramento, California 95812
nritter@dtsc.ca.gov

CEQA # 3463

Letter F

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
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March 22, 2012

Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Balboa Park Plaza de Panama Project Draft Environmental Impact Report (DEIR) # 2011031074

Dear Ms. Shearer-Nguyen:

F-1 The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. We thank you for the opportunity to comment on the above Draft Environmental Impact Report (DEIR) issued under the California Environmental Quality Act (CEQA). We want to thank Ms. Cathy Winterrowd, CLG Liaison/City Planner, for providing on-site visits to Balboa Park for my staff and for the National Park Service.

As preface to my formal comments under CEQA for this project, I want to reiterate that the OHP, absent any existing regulatory role, neither reviews nor comments on any issues or criteria while a local jurisdiction, agency or entity is in the process of developing a project. Please refer to my February 11, 2011 letter.

F-2 The City of San Diego has prepared a project level DEIR for the Balboa Park Plaza de Panama Project (Project) with the following project components: elimination of automobile traffic from the Plaza de Panama and parking from the Plaza; construction of a new bridge and a by-pass road originating at the east end of the Cabrillo Bridge to reroute traffic and allow for pedestrian uses of El Prado and the Plaza de California; redesign of the Alcazar parking lot for parking, passenger drop-off, valet parking, and construction of a new, three level parking structure with 798 parking spaces with a roof-top park/garden of 2.2 acres at the Organ Pavilion surface parking lot.

The Project's objectives are: restoration of pedestrian and park uses to the Central Mesa; alleviating vehicle and pedestrian conflicts by removing vehicles from the Plaza de Panama, El Prado, Plaza de California and the Pan American Road East while maintaining public access to the park's institutions; improving the pedestrian link between the Palisades and El Prado; recreation of the California Garden behind the Organ Pavilion; expansion of access to the Central Mesa with a new tram system while maintaining convenient valet parking and access for persons with disabilities; completion of all the work proposed in the DEIR before January 2015; and

F-1 Comment noted.

F-2 Comment noted.

LETTER

RESPONSE

Ms. Elizabeth Shearer-Nguyen
March 22, 2012
Page 2

implementation of a funding plan for a self-sustaining paid parking structure and future planned tram operations.

The Project examined in the DEIR would require amending the existing Balboa Park Master Plan (BPMP), the Central Mesa Precise Plan (CMPP), in addition to a Site Development Permit (SDP) to allow for deviations from the City's Environmental Sensitive Lands (ESL) and the Historic Resources Regulations.

F-3 Although the CMPP is more than 20 years old, its goal is to preserve the historical significance of the 1915 and 1935 Expositions sites while meeting the functional needs for the necessary administration of this one-of-a-kind regional park which derives its exceptional character from the very unique physical environment of the Central Mesa characterized by its historical, cultural and natural treasures. It is important to remember that the purpose of the CMPP is to preserve the historic features that originate from both Expositions and that form the National Historic Landmark District (NHLD). "The goal of this portion of the plan is to rehabilitate and modify the physical environment of the Central Mesa in a manner which preserves its historic significance and provides for future uses." (CMPP, p. 3)

For this purpose, the CMPP has developed detailed and specific design guidelines. These guidelines provide not just that "the individual structures/buildings should be preserved but the entire ensemble in its original composition should be preserved and restored...It is the historic relationship between the built and outdoor environment that is the hallmark of the two Expositions. Because each structure affects its site context to such a great degree, it is vital to the preservation of the historic district that every effort be made to preserve and restore original Exposition building footprints and elevations wherever possible. For this reason, emphasis has been placed on minimizing architectural additions unless they are reconstructions of significant historical features." (CMPP, p. 205)

And because preserving the spatial relationships of the NHLD is of paramount importance, very specific recommendations for reconstructions, additions to existing structures, and new structures were developed and adopted, requiring that all architectural improvements on structures listed on the National Register of Historic Places must strictly adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties, and that all design proposals for new structures should closely adhere to the established historic design themes. (CMPP, p.211)

F-4 Balboa Park is now struggling to balance both the preservation of cultural use and an open public park environment, by providing for a pedestrian-oriented park use and experience, while at the same time preserving the tremendous historical significance of the NHLD and finding solutions to functional needs, in an urban environment dominated by the automobile. The DEIR and its many alternatives has looked beyond some of the concepts and policies of the 20-year-old CMPP offering several good ideas, particularly relating to reduced traffic in or through the park. Some of these good suggestions

F-3 Comment noted.

F-4 Comment noted. The project and 13 alternatives have received complete analysis and public review consistent with CEQA Statute and Guidelines requirements.

LETTER

RESPONSE

Ms. Elizabeth Shearer-Nguyen
 March 22, 2012
 Page 3

should receive additional scrutiny and find their way into the public discourse for further exploration.

Historical Resources

- F-5 Pursuant to CEQA Guidelines §15126.2(a) an EIR is required to assess the environmental effects of the Project on the environment and shall clearly identify and describe direct and indirect significant impacts.
- F-6 Public Resources Code §21084.1 states it is required that a lead agency determine whether a project may impact a historical resource as defined by CEQA, and whether any such impact will cause a substantial adverse change in the significance of a historical resource (CEQA Guidelines §15064.5 (a)(b)(2)) and what constitutes a substantial adverse change in the significance of a historical resource or its immediate surrounding; i.e., demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register of Historical Resources. As such, a fundamental task of any EIR is to determine: a) whether there is a historical resource present, b) whether the historical resource is significant, and c) whether the proposed project would cause a substantial adverse change to the physical characteristics that convey said resources' historical significance and justify its eligibility for, or inclusion in, the California Register.
- For purposes of CEQA, the DEIR should consider the following historic resources: The Balboa Park District, the National Historic Landmark District (NHLD); the El Prado National Historic Register District; and the Cabrillo Freeway Historic District, which was determined eligible for the National Register in 1996 with the Cabrillo Bridge and nine roadway and landscape contributors. Per the currently available information from the database of the National Register of Historical Places managed by the National Park Service, the Balboa Park NHLD consists of the following contributors: ten buildings and five structures. The El Prado Complex, the National Register District, consists of 13 contributing buildings, one structure and two non-historic contributors.
- F-7 As the Court of Appeal stated in the *Santiago Water District v. County of Orange* case, an EIR needs to include sufficient analysis to determine how adverse the impact will be. (*Santiago Water District v. County of Orange* (1981) 118 Cal. App.3d 818, 831) CEQA Guidelines §15150 requires a sufficient degree of analysis to enable decision makers "to make a decision which intelligently takes account of environmental consequences.
- The ability to make a decision on the environmental consequences of the Project must be based on a sufficient degree of analysis. The following quote from the Environmental Analysis section 4.2 of the DEIR, as a case in point, states: "According to the Historical Resources Report, although there is no definitive list of contributors and non-contributors for either the National Register or the National Historic Landmark districts, it is apparent that all buildings and structures, landscapes, and objectives constructed for

F-5 Comment noted. The EIR concludes that the Area of Potential Effect (APE) contains a significant historical resource and that the Centennial Bridge component of the project would result in a significant and unmitigated impact to this resource.

F-6 Pages 10-15 of the Historical Resources Technical Report (HRTR) (EIR Appendix B-1) consider the following historical designations for El Prado/Plaza de Panama and Balboa Park: the San Diego Register of Historic Landmarks (1967; amended 1988) designation of El Prado as Landmark No. 1; the National Register designation for El Prado/Plaza de Panama (1975); the separate National Register designation for the California Quadrangle (1974); the Balboa Park National Historic Landmark designation (1977); and the designation of State Route 163 as Cabrillo Historic Parkway in a California Register historic district in 1996.

Neither the National Register nor the National Historic Landmark nominations provide a comprehensive list of contributors or non-contributors. The determination of which buildings, structures, and landscape elements were determined to be contributors and which were not is discussed on pages 108-110 of the report. The total tally of contributors to the El Prado complex (13) in the technical report matches the total mentioned by the commenter.

F-7 By means of clarification of this comment, the reference to CEQA Guidelines Section 15150 is incorrect. CEQA Guidelines Section 15151 is the section which provides the quoted material. Notwithstanding the correction, the City agrees with the comment's reiteration of an EIR's standards for adequacy, as well reference to Section 4.2.2.1b.

Although the HRTR lists The Esplanade, Palm Canyon, Spreckels Organ Pavilion and Plaza, and the House of Pacific Relations complex as contributors, it does not identify other features within this part of the historic district (mostly lawns) as district contributors. In fact, Appendix B-1 identifies several non-contributing elements in this area, including several of the 1990s-era International Cottages and the Palm Canyon restroom. The HRTR did not identify the lawn area bounded by Palm Canyon Road to the west, the Alcazar parking lot to the north, and Pan American Road East to the east (the area that would mainly be physically impacted by Centennial Road) as a historic contributor since this area has clearly been changed several times, based on an analysis of historic aerial photographs from the 1950s through the 1980s.

LETTER

RESPONSE

Ms. Elizabeth Shearer-Nguyen
 March 22, 2012
 Page 4

the 1915 Panama-California Exposition and the 1935 California Pacific International Exposition that retain integrity should be considered contributors to the NHL. Based on these criteria, the area within the vicinity of the proposed Centennial Road is not considered a district contributor. The area in which the Centennial Road would be constructed does not contain any historical structures. . . . although the construction of the Centennial road would alter the existing circulation network, it would not impact contributing features of the historic district. . . . As such the landform alteration and retaining walls associated with the Centennial Road would not be consistent with SOI Rehabilitation Standards 2 and 9, the adverse effect would not be considered significant . . . since it would not demolish, destroy, relocate or alter the NHL such that it would be materially impaired. Thus the impact of the Centennial Road would be less than significant." (p. 25-26)

F-8 The DEIR should specify what criteria were used to determine that the area in the vicinity of the proposed Centennial Road is not a contributor, and the DEIR should make clear which buildings and structures within the boundaries of the NHL are non-contributors. Moreover, the Standards, as in this DEIR, can also not be used to analyze potential impacts of the Project on the environment; they were not designed for this purpose. Instead, the Standards provide guidance for selecting treatments to historic properties, mostly to buildings.

F-9 Because this Project is planned in a National Historic Landmark District, a National Register District, and in the Cabrillo Historic Freeway District, the DEIR should include a discussion of whether this Project - as a whole - would result in any potential direct and indirect impacts to the integrity of each district. This analysis should include a discussion of whether the Project would result in an impact on the historical designations. Please note that we are not concluding that the Project would or would not result in an impact on the designation. We do believe, however, that this public concern should be explicitly addressed in the final environmental impact report.

Mitigation Measures

F-10 An EIR must describe feasible measures to reduce significant adverse impacts (CEQA Guidelines §15126.4(a)(1)). The DEIR concluded that the Project would cause significant adverse unmitigable impacts to historic resources. CEQA requires the identification of feasible measures to mitigate significant adverse changes in the significance of a historical resource. (CEQA Guidelines §15064.5(4)) And pursuant to CEQA Guidelines § 15126.4 (b)(2) mitigation measures may include historical resource documentation, photographs, and architectural drawings. The EIR should consider development of such mitigation measures where significant unavoidable impacts are identified.

F-11 In closing, I wish to express my agreement with the conclusion in the DEIR that the introduction of the Centennial Bridge into the NHL and the El Prado Historic District causes a substantial adverse change in the significance of these historical resources

F-7 (cont.)

Changes include the construction of a paved asphalt path on the east side of Palm Canyon following the destruction of the Honeymoon Bridge after 1950 and the construction of the Alcazar parking lot driveway through the lawn ca. 1964. This lawn does not appear to be a contributor, and is not listed as such in Appendix B-1, because it is not a distinct named feature. Appendix B-1 discusses impacts to this area in depth on pages 124, 135-37, and 146-47

F-8 The Secretary of the Interior's Standards for Rehabilitation are used to analyze potential impacts of a project on historic structures as well as cultural landscapes, as noted in the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes. See pages 10-15 and 108-110 of Appendix B-1 for an inventory of contributors and non-contributors within the Balboa Park Historic District.

Refer to Section 4.3.

F-9 During preparation of Appendix B-1, an APE that encompasses all of these districts was developed. Appendix B-1 considers the entire Central Mesa south of Old Globe Way, Cabrillo Canyon, and a large portion of the West Mesa to be the APE and includes everything built, planted, or altered before 1936 as a contributor. Appendix B-1 analyzes the impacts to the APE and determined that the project does not comply with the SOI Standards 2 and 9, and that it would have a significant and unavoidable impact on Cabrillo Bridge and the California Quadrangle, and to a lesser extent, on the Balboa Park Historic District. This is discussed on page 150 of the HRTR. The HRTR also concludes on page 150 that the project would not result in the delisting of Balboa Park as a National Historic Landmark district (understanding that the NR district is a smaller component of the larger National Historic Landmark district). See Section 4.2.

F-10 In response to this comment, preparation of Historic American Engineering Record (HAER) documentation for the Cabrillo Bridge has been added as conditions of project approval. The significant impact discussed in Section 4.2.2.1(b) of the EIR relative to the inconsistency of the Centennial Bridge with SOI Standards 2 and 9 would remain significant even after implementation of these conditions of approval. This revision to the Final EIR does not add significant new information as defined by CEQA Guidelines Section 15088.5.

F-11 Comment noted.

LETTER

RESPONSE

Ms. Elizabeth Shearer-Nguyen
March 22, 2012
Page 5

because this construction element was never part of the original design for the Expositions. The original plans for the Expositions followed a design plan defined by the formal dignity of great cities characterized by an axial symmetry with grand focal points. As such, the curving design of the bridge is opposing the straight and axial design that characterizes the approaches, plazas, arcades, and roads of Balboa Park. The approach across Cabrillo Bridge represents the primary historic view landscape and is, in fact, one of the most sensitive areas of the entire Park because it is Bertram Goodhue's city in miniature - city on the hill design.

Thank you again for the opportunity to comment on this DEIR.

Please don't hesitate to contact me if you have any questions either at (916) 445-7043 or at mwdonaldson@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

CC: Cathy Winterrowd, Senior Planner/CLG Liaison, City of San Diego
Elaine Jackson-Retondo, Acting History Program Manager, National Park Service, Pacific West Regional Office
Stephanie Toothman, Associate Director, Cultural Resources, National Park Services
John Lemmo, Chair, Historical Resources Board, City of San Diego

LETTER

RESPONSE

Letter G

From: [Tom Fox](#)
To: [DSD EAS](#)
Subject: Plaza de Panama
Date: Thursday, February 16, 2012 10:50:47 AM

G-1

The Board of Directors of the Bellefontaine Condominiums, located at 2400 Sixth Avenue, San Diego, 92101, has taken the unanimous action to approve and recommend the "Jacobs" plan for the Plaza de Panama. The Board of the Bellefontaine did review the multiple options in the EIR before taking this action.

Note: The Board and residents of the Bellefontaine are concerned that any closure of the bridge on the west side of the park would result in excessive traffic and parking issues in the Bankers Hill/Park West areas.

Respectfully submitted,

Thomas L. Fox, Secretary
Board of Directors, Bellefontaine Condominium Association

G-1 Comment noted.

Letter H



March 14, 2012

Elizabeth Shearer-Nguyen
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Plaza de Panama Project Draft EIR

Dear Ms. Shearer-Nguyen:

H-1

On behalf of the 26 art, science, and cultural institutions comprising the Balboa Park Cultural Partnership (BPCP), I am writing to comment on the Draft EIR for the Plaza de Panama Project. BPCP was formed in 2003 to provide a means for member institutions to identify and achieve collective goals and to speak with one voice on issues of mutual benefit and importance. We are dedicated to developing and sustaining the Park for the benefit of all now and into the future.

The Plaza de Panama Project is an issue that the Partnership feels is of mutual benefit and importance to our membership, and to the Park as a whole. Our board voted early last year to support the project.

We have reviewed the Draft EIR and find it to be a very thorough document that looked at all feasible alternatives to the project. If this alternatives analysis tells us anything, it is that there is no perfect alternative, but it clearly shows which one is best. The Plaza de Panama Project is the only alternative that presents a well-thought plan that addresses increased park space, historical restoration and rehabilitation, accommodation of visitor access to the park, increased parking and improved mobility within the park.

In addition to comments about the proposed project, we would like to express our opposition to alternatives that propose to close the Cabrillo Bridge to vehicles. Closing off access from the bridge may negatively impact the institutions within the park. Our member institutions count on convenient access to the park to attract more visitors, and cutting off that access will hinder these efforts. We should be pursuing efforts that make it easier to get to the park, not more difficult.

Thank you for the opportunity to provide these comments.

Sincerely,

Paige Simpson
Interim Executive Director

Cc: Mayor Jerry Sanders
Plaza de Panama Committee
Councilmember David Alvarez
Councilmember Carl DeMaio
Councilmember Marti Emerald

Councilmember Kevin Faulconer
Councilmember Todd Gloria
Councilmember Sherri Lightner
Councilmember Tony Young
Councilmember Lorie Zapf

Collaborative for Arts, Science & Culture

H-1

Comment noted.

LETTER

RESPONSE



BALBOA PARK/MORLEY FIELD RECREATION COUNCIL
Balboa Park Activity Center
2145 Park Boulevard
San Diego, CA 92101
(858) 581-7100

Letter I

March 13, 2012

To: E. Shearer-Nguyen, Environmental Planner
City of San Diego
DSDEAS@sandiego.gov

RE: Balboa Park Plaza de Panama, Project #233958/SCH No. 2011031074

I-1 As members of the Balboa Park/Morley Field Recreation Council we deal with Balboa Park's recreation component. We are excited that improvements will be coming to Balboa Park. We do have reservations and concerns that we request will be taken into account in implementing any improvements.

The Recreation Council supports the Balboa Park Plaza de Panama Project plan to reduce auto traffic and create walking areas through the center of Balboa Park, increase and improve parking throughout the park and create more open space. However, we are concerned that the parking plan will negatively impact recreation users of the park but feel with proper implementation and review the negative effects can be mitigated.

The idea of and removing Navy and City College users from Lower Inspiration Point is crucial to a successful parking plan implementation to free up adequate parking spaces during and after construction. This will require a concerted and substantial good faith effort by the Plaza de Panama Committee and the City to assure that these spaces are available for the general public and/or City employees. The idea sounds good but it must have real substance.

I-2 Additionally, the best of plans may not materialize. We request that there be established a structure, a process and a clear point of contact for monitoring and implementation of modifications to the parking component during phases of construction and after completion of the parking structure and bypass bridge. Groups putting on special events need to know who to contact, as well as the process to be able to modify parking plans to assure the success of their events. User groups need to know that their members will have access to the Park. The Park is for everyone.

I-3 We believe that the Balboa Park Plaza de Panama improvements will add greatly to the beauty and utilization of the park. But, as new circumstances arise, we will need to effectively deal with parking issues. We look forward to Balboa Park's second century as the crown jewel of San Diego.

Sincerely,

Jerry Harris
Chair, Balboa Park / Morley Field Recreation Council

I-1 Comment noted.

I-2 Comment noted. As a condition of the permit, a transportation/parking coordinator would be employed as part of the construction staffing that would coordinate the tram operation and address issues/concerns relative to construction phase parking and transportation during construction. This individual would act as a liaison between the Institutions and the construction team, working under the authority of the City's Department of Park and Recreation (Park & Recreation), though employed by the Plaza de Panama Committee.

I-3 Comment noted.

Letter J

THE COMMITTEE OF ONE HUNDRED
Dedicated to the Preservation of Spanish Colonial Architecture in Balboa Park



February 21, 2012

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
122 First Avenue, MS 501
San Diego, CA 92101

Re: Balboa Park Plaza de Panama Draft Environmental Impact Report
Project No. 233958/SCH No. 2011031074

Dear Ms. Shearer-Nguyen,

The Committee of One Hundred has worked since 1967 to preserve Balboa Park's historic buildings, gardens and public spaces.

We enthusiastically support the goals of reclaiming the public spaces of Balboa Park's Plaza de Panama, west El Prado, Plaza de California, and the Esplanade.

But we don't need a new "bypass bridge" to achieve those goals. There is a much better alternative to achieve these goals without changes to the Cabrillo Bridge, the canyons, or the historic views of our "Dream City." San Diego should close the Cabrillo Bridge to traffic.

Returning the Cabrillo Bridge to pedestrians will remove all need for a new "bypass bridge." Traffic turnarounds for passenger drop-off and regular tram service across the Cabrillo Bridge will make it easier than ever to get to theaters, museums, and events from the west. A well-designed, well-managed tram system is critical to the success of the plan to remove traffic and parking lots from the public spaces that we hope to reclaim. Reliable and convenient trams will make public transportation and peripheral parking convenient for employees, volunteers, and visitors.

Construction of the proposed "bypass bridge" is not only unnecessary but out of place in this National Historic Landmark District.

Michael Kelly, President
619-981-4521
michael.kelly@c100.org

The Committee of One Hundred, Balboa Park Administration Building
2125 Park Boulevard, San Diego, CA 92101-4753
www.C100.org

J-1

J-1 Comment noted.

J-2

J-2 Comment noted. A tram system is an integral part of the project. As stated in Section 3.1, it is the intention of the project to restore pedestrian uses throughout the Park and to alleviate pedestrian/vehicular conflicts. In order to further accommodate pedestrian use, the project would continue to provide and supplement tram service linking multiple locations in the Central Mesa. See Figure 3-30 for a detail of the proposed tram route. An expanded tram system could be completed in the future but is not a part of the scope of the project.

J-3

J-3 Comment noted.



CITIZENS COORDINATE FOR CENTURY 3

Letter K

5252 Balboa Ave, Suite 207
San Diego, CA 92117-7005
Phone 858.277.0900
E-mail c3sandiego@sbcglobal.net

March 21, 2012

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Mike Stepler

Susan Riggs Timsky

Jay Turner

E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Balboa Park Plaza de Panama (Project No. 233958/SCH No. 2011031074)

Dear Ms. Shearer-Nguyen:

Attached please find comments on the Plaza de Panama Draft Environmental Impact Report prepared by several members of C3's Parks & Open Space committee. C3's board of directors will be meeting on April 8th to review the committee's work product. Please note that C3 enables specific standing committees to respond on behalf of the organization, particularly on a time sensitive basis such as this draft EIR, when the issue is one in which C3 has demonstrated civic experience and has position statements in place to guide the committee's actions.

As mentioned above, C3 has a long-standing interest in all aspects of issues relating to Balboa Park. In recent decades our organization has actively participated in the draft processes of the Balboa Park Master Plan in 1986, the Central Mesa Precise Plan in 1992, as well as many other studies, including: traffic circulation, parking, landscape architecture, pedestrian access, museum building expansion, and more.

With respect to the proposed project the only position C3 has taken to date is to oppose the construction of the bypass bridge off of the Cabrillo Bridge. C3 is aligned with the many other civic and community organizations who wish to emphasize pedestrian use of the park and to de-emphasize automobile use within the park, particularly within the Central Mesa.

C3 strongly supports both in concept and in implementation, an intra-park shuttle service to accommodate reduced vehicular access within the Central Mesa. The proposed tram service that is a part of the Plaza de Panama project fails in that effort. The proposed project encourages automobile use rather than discourages such.

Your responses to the questions raised by C3's Parks & Open Space committee to the Plaza de Panama Draft EIR are appreciated.

Sincerely,

John Lomac
2012 C3 President

1961-2012

K-1

A

B

C

K-1

A

Comment noted.

B

See response to comment J-1b.

C

Comment noted.

LETTER

RESPONSE

COMMENTS ON PLAZA DE PANAMA DRAFT ENVIRONMENTAL IMPACT REPORT
Citizens Coordinate for Century 3 March 22, 2012

K-2 It is evident that if a choice must be made over status quo, that the Project Objectives – established by proponent and imposed on each alternative as absolutes, required to be met – must be reassessed relative to the physical, historical, visual range of alternatives covered in this document. It has become more and more obvious that this is a classic situation where the “cure” is far worse than the “illness”.

K-3 DEIR Part 1, Exec. Summary, S.1.3., Project Objectives & Part 4, Section 9.0
DEIR objective is stated as “Restore pedestrian and park uses to the Central Mesa; alleviate vehicle and pedestrian conflicts.”
All of the enumerated objectives can be achieved in far less intrusive and less costly ways by either closing the Cabrillo Bridge to vehicles altogether or to close Cabrillo Bridge to vehicles on a managed schedule, as has been practiced in Golden Gate Park and Central Park for several years.

K-4 DEIR Part 1, Exec. Summary, S.5.1., & Part 4, Section 9.3.2, + Figure 9.2a, 9.2b [p.53ff of 344]
Alternative 1: No Project (Existing Conditions)
COMMENT: This is how traffic in & through many urban parks increasingly is managed, particularly Golden Gate Park & Central Park (weekends); see TPL CCPE reports from 2007-2008 etc.
COMMENT: This is not the same as a No Project (Existing Conditions) and it is incorrect to equate the CMPP Alternative with a No Project (Existing Conditions) Alternative. The CMPP Alternative must be evaluated at the same level all alternatives that do not maintain “existing conditions”.

K-5 Alternative 2
DEIR Part 1, Exec. Summary, S.5.1. & Part 4, Section 9.3.2, + Figures 9.2a, 9.2b
Alternative 2: No Project (Central Mesa Precise Plan):
COMMENT: This is not the same as No Project (Existing Conditions) and it is incorrect to equate the CMPP Alternative with a No Project (Existing Conditions) Alternative. The CMPP Alternative must be evaluated at the same level all alternatives that do not maintain “existing conditions”.

K-6 DEIR states that the CMPP plan calls for managed traffic: 1-way (9:30-5:00); 2-way all other times.
COMMENT: This is, increasingly, how traffic into & through many urban parks increasingly is managed, particularly Golden Gate Park & Central Park (weekends); see TPL CCPE reports from 2007-2008 etc. This traffic management solution should receive serious emphasis in deciding on which alternative or elements of alternatives that should be considered for approval.

K-7 A DEIR states that the CMPP plan calls for managed traffic: 1-way (9:30-5:00); 2-way all other times.
COMMENT: This is, increasingly, how traffic into & through many urban parks increasingly is managed, particularly Golden Gate Park & Central Park (weekends); see TPL CCPE reports from 2007-2008 etc. This traffic management solution should receive serious emphasis in deciding on which alternative or elements of alternatives that should be considered for approval.

B QUESTION: On comparing data on traffic impacts in Alternative 2 with traffic impact data given for Alternative 1 (A St., Robinson,

K-2 Comment noted.

K-3 Comment noted.

K-4 Comment noted.

K-5 The No Project (No Development/Existing Conditions) Alternative is not the same as the No Project/Central Mesa Precise Plan Alternative. The No Project (No Development/Existing Conditions) Alternative is discussed in Section 9.3.1 and the No Project/Central Mesa Precise Plan Alternative is discussed and analyzed in detail in Section 9.3.2. CEQA Guidelines Section 15126.6(e) provides instruction on the analysis of a No Project alternative. Specifically, when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the No Project alternative will be the continuation of the existing plan, policy, or operation into the future. Alternatively, if the project is other than a land use or regulatory plan, for example a development project on identifiable property, the No Project alternative is the circumstance under which the project does not proceed.

For the purposes of providing a comprehensive range of alternatives, both of these No Project scenarios are included in the EIR. Consistent with CEQA Guidelines Section 15126.6(d), all alternatives in the EIR are given an adequate level of analysis, providing sufficient information about each to allow meaningful evaluation, analysis, and comparison with the project.

K-6 See response to comment K-5.

K-7 A Comment noted. The decision makers (City Council) will review all alternatives, including the Alternative 2 which compares build-out of the CMPP to the project. The CMPP traffic management program is included in this alternative and will be considered.

B Using existing traffic volumes and SANDAG forecast models, traffic volumes were determined for the future years 2015 and 2030 for the project and all the project alternatives. Alternative 2 would alter the existing traffic patterns since only a one-way eastbound traffic would be allowed on the Cabrillo Bridge. Due to these changes, traffic would be rerouted to nearby streets, increasing the volumes more than No Project conditions. The project would not alter traffic volumes on the external streets or traffic patterns to the Park.

| | | | |
|-------------|--|---|--|
| <p>C</p> | | <p>Sixth), how can you determine that increases in traffic on certain external streets are not the result of natural increase with or without CMPP alternative and/or Project?</p> <p>Please specify the cost per parking space in the Organ Pavilion parking structure. Since the majority of the spaces in the structure are already in place within the Central Mesa and "paid for", we would be "buying" 798 spaces, including only 273 new.</p> | <p>K-7 (cont.) C See response to comment K-48.</p> |
| <p>K-8</p> | <p>DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3A + Figures 9.3a, 9.3b</p> | <p>Alternative 3A: <u>No New Parking Structure Alternative</u> DEIR states that the No New Parking Structure will result in a net loss of 158 non-ADA parking spaces. <u>QUESTION:</u> Where are all of the lost ADA spaces located today other than Plaza de Panama & Alcazar lot? Would these not be replaced by marking more spaces in the Organ Pavilion lot as ADA?</p> <p>DEIR states that Alt. 3A would have greater traffic impacts compared to the proposed project in near term and in 2030, internal and external roadways/intersections would operate poorly, constituting significant and unmitigable impacts. <u>QUESTION:</u> What, specifically, are these greater impacts? To what extent would these impacts be expected to occur naturally, with or without projects?</p> | <p>K-8 The 158 non-ADA spaces that would be lost would be a result of removing parking from Plaza de Panama and converting the Alcazar parking lot into an ADA only/valet stacking/passenger loading/unloading area. The project would add additional ADA spaces within the Alcazar parking lot and the proposed Organ Pavilion parking structure. Overall, the project would increase ADA parking by 12 accessible parking spaces.</p> |
| <p>K-9</p> | | | <p>K-9 Table 9-3 includes a summary of roadway segment impacts and Table 9-4 shows intersection impacts for all of the alternatives in both years 2015 and 2030. As indicated in the legends of each table, the tables identify natural growth effects with X (segment operates poorly even without construction of the alternative), and identifies impacts caused by the alternatives with SM (significant impact as a result of the alternative that can be mitigated) and SU (significant impact as a result of the alternative that cannot be mitigated).</p> |
| <p>K-10</p> | <p>DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3B</p> | <p>Alternative 3B: <u>Organ Pavilion Parking Structure</u> No specific comments or questions; this alternative is essentially approved in the adopted BPMP & CMPP.</p> | <p>As shown, Alternative 3A would impact one segment in year 2015 and four in year 2030; these impacts would be unmitigable. The project would not result in any roadway segment impacts in either years 2015 or 2030. Alternative 3A would impact two intersections in year 2015, both of which would be mitigable; and five intersections in the year 2030, four of which would be mitigable. In comparison, the project would result in an impact to one intersection in year 2030 which would be mitigated. See Tables 9-3 and 9-4 for the locations of the impacts.</p> |
| <p>K-11</p> | <p>DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3C + Figures 9-5a, 9-5b</p> | <p>Alternative 3C: <u>West Mesa Parking Structure Alternative</u> <u>QUESTION:</u> Why only 978 spaces? Can location accommodate only this size? Could location accommodate greater number of spaces? Or was number selected to match Project OP structure without consideration that the alternative location might accommodate more than 978 spaces?</p> | <p>K-10 Comment noted.</p> <p>K-11 In order to provide a rational comparison of parking options, all alternative parking structure locations were considered to have the same number of spaces (unless noted otherwise during the scoping exercise) included under the project.</p> |
| <p>K-12</p> | <p>DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3D + Figures 9-6a, 9-6b</p> | <p>Alternative 3D: <u>Inspiration Point Parking Structure</u> <u>COMMENT:</u> The analysis should include study of this alternative with open bridge, with and without managed traffic. Instead, the analysis done assumes that this alternative can function only with full closure of Cabrillo Bridge. <u>QUESTION:</u> Why did the consultants evaluate an above-ground structure at this site and not an underground structure that would take advantage of the existing terracing and descending terrain? This has always been the configuration assumed by most citizens involved in Balboa Park planning. This should be evaluated and an honest estimate of parking spaces arrived at for a below-ground structure with park on top at the current street level of Park Blvd. @President's Way.</p> | <p>K-12 As required under CEQA Guidelines Section 15126.6, the EIR considers and discusses multiple alternatives to the project. As required pursuant to CEQA Guidelines Section 15126.6(a) these alternatives were selected to provide a reasonable range of possible project designs</p> |

LETTER

RESPONSE

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|------|--|---|---|
| K-13 | <p>Alternative 3C continued</p> <p>QUESTION: Why did consultants consider only a structure the same size as OP garage instead of maximizing space at Inspiration Point where surface parking accommodates 1264 spaces, per consultant Table 4.4-4, actually reducing the number of parking spaces overall?</p> <p>QUESTION: What is the number of spaces in the northeast sector of Inspiration Point?</p> <p>QUESTION: Even with surface spaces northeast of Park Blvd/President's Way subtracted, the area southeast surely could accommodate more than 798 spaces. Why is this not true?</p> <p>The DEIR states that, with Alternative 3DA, the tram would loop from the parking structure to the Mall/Plaza de Panama. QUESTION: Why is there no provision for a tram loop continuing west across Cabrillo Bridge & return (especially under the assumed closure to vehicles on the bridge in this alternative)?</p> <p>QUESTION: If Cabrillo Bridge remained open with CMPP as adopted or with CMPP + managed traffic, what would the impacts be on internal and external roadways/intersections? This should have been included in evaluation of alternatives.</p> <p>COMMENT: ALUC/AEOZ designations are designed primarily for residential and intensive commercial development and provisions can be waived by local jurisdiction; furthermore, a subterranean structure would be at no greater elevation than the higher portions of the surface lot so should not be an ALUC/AEOZ concern.</p> <p>COMMENT re View Corridor obstruction: If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p>COMMENT: As is true in other alternatives that the DEIR calls out as farther from Plaza de Panama than the OP garage, a good, frequent tram system would resolve access to PdeP & Prado institutions.</p> <p>DEIR Part 1, Exec. Summary, S.5.3.1.a. & Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b</p> <p>Alternative 4Ai: <u>Gold Gulch Parking Structure Alternative</u> QUESTION: DEIR states that this alternative would maintain vehicle traffic across Cabrillo Bridge plus a new "Park Road" along edge of (Palm Canyon?) yet the very next sentence states that Cabrillo Bridge will be pedestrianized. Which is it? QUESTION: How does "new Park Road" differ from Centennial Road? Do they mean that the new park road will cross the edge of Gold Gulch? QUESTION: What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p> | K-12 (cont.) | <p>which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project. Specifically, the factors considered in the selection of alternative included:</p> |
| K-14 | | <ul style="list-style-type: none"> • Whether the alternative would avoid or substantially lessen or significant impacts of the project. • Whether the alternative addresses solutions that are not addressed by other alternatives. • Whether the alternative would feasibly attain most of the basic objectives of the project. | |
| K-15 | | <p>The modification to the Inspiration Point Parking Structure Alternative suggested by this comment would not further meet these criteria. Therefore, it would not add to the reasonable range of alternatives already addressed in the EIR and need not be addressed.</p> | |
| K-16 | | <p>K-13 This response relates to Alternative 3D. See response to comment K-11.</p> | |
| K-17 | | <p>K-14 The northern section of Inspiration Point currently has approximately 386 standard spaces and 22 ADA spaces.</p> | |
| A | | <p>K-15 Even with the loss of the 376 spaces from the north lot, there are 888 spaces available in the southern section of Inspiration Point parking lot. To allow for an equitable comparison of impacts, the parking structures under all applicable alternatives were assumed to have an equal number of spaces.</p> | |
| B | | <p>K-16 In selecting the reasonable range of alternatives, the EIR attempted to evaluate equivalent levels of service/cost. Overall, the intent of the proposed tram is to be as flexible/expandable as possible depending on future needs and requirements. It is possible that the current Park tram would continue to function as it does today, with the proposed tram providing supplemental services.</p> | |
| | <p>K-17 A See response to comment K-12.</p> | | |
| | <p>B Comment noted.</p> | | |

LETTER

RESPONSE

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| <p>Alternative 3C continued</p> | <p>QUESTION: Why did consultants consider only a structure the same size as OP garage instead of maximizing space at Inspiration Point where surface parking accommodates 1264 spaces, per consultant Table 4.4-4, actually reducing the number of parking spaces overall?</p> <p>QUESTION: What is the number of spaces in the northeast sector of Inspiration Point?</p> <p>QUESTION: Even with surface spaces northeast of Park Blvd/President's Way subtracted, the area southeast surely could accommodate more than 798 spaces. Why is this not true?</p> <p>The DEIR states that, with Alternative 3DA, the tram would loop from the parking structure to the Mall/Plaza de Panama.</p> <p>QUESTION: Why is there no provision for a tram loop continuing west across Cabrillo Bridge & return (especially under the assumed closure to vehicles on the bridge in this alternative)?</p> <p>QUESTION: If Cabrillo Bridge remained open with CMPP as adopted or with CMPP + managed traffic, what would the impacts be on internal and external roadways/intersections? This should have been included in evaluation of alternatives.</p> <p>COMMENT: ALUC/AEOZ designations are designed primarily for residential and intensive commercial development and provisions can be waived by local jurisdiction; furthermore, a subterranean structure would be at no greater elevation than the higher portions of the surface lot so should not be an ALUC/AEOZ concern.</p> <p>COMMENT re View Corridor obstruction: If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p>COMMENT: As is true in other alternatives that the DEIR calls out as farther from Plaza de Panama than the OP garage, a good, frequent tram system would resolve access to PdeP & Prado institutions.</p> | <p>K-18 See response to comment K-12.</p> |
| <p>DEIR Part 1, Exec. Summary, S.5.3.1.a.</p> | <p>Alternative 4Ai: Gold Gulch Parking Structure Alternative</p> <p>QUESTION: DEIR states that this alternative would maintain vehicle traffic across Cabrillo Bridge plus a new "Park Road" along edge of (Palm Canyon?) yet the very next sentence states that Cabrillo Bridge will be pedestrianized. Which is it?</p> <p>QUESTION: How does "new Park Road" differ from Centennial Road? Do they mean that the new park road will cross the edge of Gold Gulch?</p> <p>QUESTION: What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p> | <p>K-19 Comment noted. See response to comment K-16.</p> |
| <p>& Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b</p> | <p>QUESTION: DEIR states that this alternative would maintain vehicle traffic across Cabrillo Bridge plus a new "Park Road" along edge of (Palm Canyon?) yet the very next sentence states that Cabrillo Bridge will be pedestrianized. Which is it?</p> <p>QUESTION: How does "new Park Road" differ from Centennial Road? Do they mean that the new park road will cross the edge of Gold Gulch?</p> <p>QUESTION: What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p> | <p>K-20 Sections S.5.3.1(a) and 9.3.4Ai.1 have been clarified to explain that under the Gold Gulch Parking Structure Alternative, the Cabrillo Bridge would be open to vehicular traffic up to the newly constructed Centennial Bridge.</p> |
| <p>K-18</p> | <p>QUESTION: Why did consultants consider only a structure the same size as OP garage instead of maximizing space at Inspiration Point where surface parking accommodates 1264 spaces, per consultant Table 4.4-4, actually reducing the number of parking spaces overall?</p> | <p>K-21 Park Road would differ from Centennial Road mainly in that it would be at-grade with the reclaimed parkland behind the Organ Pavilion, whereas Centennial Road would traverse below the pedestrian promenade. Additionally, Park Road would connect to Park Boulevard at a new signalized intersection. Centennial Road would wrap around the eastern perimeter of the Organ Pavilion Parking Structure and connect to Presidents Way.</p> |
| <p>K-19</p> | <p>QUESTION: What is the number of spaces in the northeast sector of Inspiration Point?</p> | <p>K-22 This reference to the potential impact has been deleted in the EIR. It is recognized that the Gold Gulch Parking Structure Alternative realignment of Park Boulevard and Inspiration Point Way with the new access road to Gold Gulch Parking Structure could impact an existing structure that is part of Centro Cultural de la Raza located immediately south of Centro Cultural the building where the street extension is proposed. For the extension east of Park Boulevard the roadway realignment and proposed grading/cut-slope shown could impact the Veterans Memorial site. However, it is acknowledged that these constraints could possibly be addressed through actual engineering of the alternative.</p> |
| <p>K-20</p> | <p>QUESTION: Even with surface spaces northeast of Park Blvd/President's Way subtracted, the area southeast surely could accommodate more than 798 spaces. Why is this not true?</p> | |
| <p>K-21</p> | <p>The DEIR states that, with Alternative 3DA, the tram would loop from the parking structure to the Mall/Plaza de Panama.</p> | |
| <p>K-22</p> | <p>QUESTION: Why is there no provision for a tram loop continuing west across Cabrillo Bridge & return (especially under the assumed closure to vehicles on the bridge in this alternative)?</p> | |

LETTER

RESPONSE

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| K-23 | Alternative 4Ai continued | World Beat Center? Entry road to Japanese Friendship Garden?) <u>QUESTION:</u> How much parkland would be regained with this alternative? | K-23 Approximately 6.3 total acres of parkland would be regained with this alternative as analyzed, including the plazas, pedestrian promenades, and usable parkland regained in the Organ Pavilion parking lot. See response to comment BT-32. |
| K-24 | DEIR Part 1, Exec. Summary, S.5.3.2.b. & Part 4, Section 9.3.4Aii + Figure 9-8 | Alternative 4Aii: <u>No Paid Parking Alternative</u> The DEIR states that traffic & circulation impacts would be slightly greater with no paid parking with than Project because lack of parking fee would result in greater concentration of visitors seeking to park at the Organ Pavilion structure. <u>QUESTION:</u> Not clear on what is meant here – seems to state that this alternative would have identical impacts yet slightly greater than fee-based OP Structure, per DEIR. Are the consultants suggesting that fewer people would seek to park in the OP garage with paid parking (which fees are intended to pay off bonds and support a tram system)? | K-24 As described in Section 9.3.4Aii, the No Paid Parking Alternative would contain all of the same features as the project except that parking in the Organ Pavilion parking structure would be free of charge. Under the No-paid Parking Alternative, it is estimated that 10 percent more (on a typical Saturday peak hour) patrons would park in the structure compared to the proposed paid parking option. |
| K-25 | DEIR Part 1, Exec. Summary, S.5.3.2.a. & Part 4, Section 9.3.4Bi + Figures 9-9a, 9-9b | Alternative 4Bi: <u>Tunnel Alternative</u> DEIR states that this alternative would introduce a contemporary element into the historical setting. <u>QUESTION:</u> Isn't this equally true for the Centennial Bridge? | K-25 While certain elements would be different, the EIR concludes that both the Tunnel Alternative and the project (as it relates to the Centennial Bridge) would have significant and unmitigable impacts to the National Historic Landmark District (NHLD). |
| K-26 | | DEIR states that this alternative would not be consistent with SOI Standards 2 & 9. <u>QUESTION:</u> Isn't this equally true for the Centennial Bridge? DEIR states that this alternative does not conform to a long list of existing policies and planning documents. Isn't this equally true for the Centennial Bridge? | K-26 See response to comment K-25. The EIR concludes that both the Tunnel Alternative and the project (as it relates to the Centennial Bridge) would be inconsistent with SOI Rehabilitation Standards 2 and 9. |
| K-27 | | In general, the complete details studied in all alternatives seem to be called out selectively in some alternatives and not others, mostly specific aspects that (it is argued) make an alternative unsuitable even though often they are equally true for the Project itself. This is particularly noticeable where the intersection and street segments are specifically called out in some alternative summaries but not in all alternatives (for example but not limited to this). | K-27 Tables 4.1-2 and 4.1-3 disclose the inconsistencies of the project with both the adopted Balboa Park Master Plan and Central Mesa Precise Plan. |
| | DEIR Part 1, Exec. Summary, S.5.3.2.b. & Part 4, Section 9.3.4Bii +Figures 9-10a, 9-10b | Alternative 4Bii: <u>Stop-Light (One-Way) Alternative</u> No specific questions or comments. | The alternatives analyzed in Section 9.0 are comprised of City and applicant proposed alternatives, as well as some submitted by the public for incorporation into the EIR. As disclosed in Section 9.1.1, a few of the publicly submitted alternatives were fairly comprehensive in nature and were included in Section 9.1. Other alternatives, identified during the scoping process, lacked sufficient detail to complete a thorough analysis in this EIR or were similar in nature in to other proposals. Therefore, for these alternatives, it was necessary for City staff to develop a set of assumptions concerning the missing components from each alternative. The rationale, or assumptions, guiding the development of each alternative is described in greater detail in Section 9.3. |
| | DEIR Part 1, Exec. Summary, S.5.3.2.c. & Part 4, Section 9.3.4Biii +Figures 9-11a, 9-11b | Alternative 4Biii: <u>Modified CMPP w/o Parking Structure</u> No specific questions or comments. | |
| | DEIR Part 1, Exec. Summary, S.5.3.2.c. & Part 4, Section 9.3.4Biv +Figures 9-11a, 9-11b | Alternative 4Biv: <u>Half-Plaza (Environmentally Superior) Alternative</u> <u>QUESTION:</u> Will the road comprising the "one-way loop" be narrowed from its present configuration? | |

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| Alternative 4Ai continued | World Beat Center? Entry road to Japanese Friendship Garden?) <u>QUESTION:</u> How much parkland would be regained with this alternative? | |
| DEIR Part 1, Exec. Summary, S.5.3.2.b. & Part 4, Section 9.3.4Aii + Figure 9-8 | Alternative 4Aii: <u>No Paid Parking Alternative</u> The DEIR states that traffic & circulation impacts would be slightly greater with no paid parking with than Project because lack of parking fee would result in greater concentration of visitors seeking to park at the Organ Pavilion structure. <u>QUESTION:</u> Not clear on what is meant here – seems to state that this alternative would have identical impacts yet slightly greater than fee-based OP Structure, per DEIR. Are the consultants suggesting that fewer people would seek to park in the OP garage with paid parking (which fees are intended to pay off bonds and support a tram system)? | |
| DEIR Part 1, Exec. Summary, S.5.3.2.a. & Part 4, Section 9.3.4Bi + Figures 9-9a, 9-9b | Alternative 4Bi: <u>Tunnel Alternative</u> DEIR states that this alternative would introduce a contemporary element into the historical setting. <u>QUESTION:</u> Isn't this equally true for the Centennial Bridge? DEIR states that this alternative would not be consistent with SOI Standards 2 & 9. <u>QUESTION:</u> Isn't this equally true for the Centennial Bridge? DEIR states that this alternative does not conform to a long list of existing policies and planning documents. Isn't this equally true for the Centennial Bridge? In general, the complete details studied in all alternatives seem to be called out selectively in some alternatives and not others, mostly specific aspects that (it is argued) make an alternative unsuitable even though often they are equally true for the Project itself. This is particularly noticeable where the intersection and street segments are specifically called out in some alternative summaries but not in all alternatives (for example but not limited to this). | |
| DEIR Part 1, Exec. Summary, S.5.3.2.b. & Part 4, Section 9.3.4Bii + Figures 9-10a, 9-10b | Alternative 4Bii: <u>Stop-Light (One-Way) Alternative</u> No specific questions or comments. | K-28 Comment noted. |
| DEIR Part 1, Exec. Summary, S.5.3.2.c. & Part 4, Section 9.3.4Biii + Figures 9-11a, 9-11b | Alternative 4Biii: <u>Modified CMPP w/o Parking Structure</u> No specific questions or comments. | K-29 Comment noted. |
| DEIR Part 1, Exec. Summary, S.5.3.2.c. & Part 4, Section 9.3.4Biv + Figures 9-11a, 9-11b | Alternative 4Biv: <u>Half-Plaza (Environmentally Superior) Alternative</u> <u>QUESTION:</u> Will the road comprising the "one-way loop" be narrowed from its present configuration? | K-30 No roadway width specifications for the El Cid Island loop road were identified in this alternative's description; however, this one-way, one-lane loop roadway would be narrowed to 12 feet. The existing Mall roadway is approximately 27 feet wide. |

LETTER

RESPONSE

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| K-31 | <table border="1"> <tr> <td data-bbox="199 277 443 1081">Alternative 4Biv continued</td> <td data-bbox="443 277 930 1081"> <p>DEIR states this alternative's "impacts to historic resources would be significant and unmitigable" but fails to point out that the changes can easily be reversed, unlike changes for a permanent Centennial Bridge, Centennial Road and reconfigured Alcazar lot.</p> <p><u>QUESTION:</u> Why is that argument made for this alternative yet, in evaluation of the Project itself, the argument is made that the bypass, new road and reconfigured Alcazar lot could be reversed at some time in the future despite the reality that anything this massive is very unlikely to be torn down once built.</p> <p>DEIR states that "The El Cid Island component was "determined in the historical analysis as disrupting the spatial relationships in the area, could significantly alter key views, identified in the CMPP, specifically the view from the Museum of Art looking south and the view from the Organ Pavilion and the Mall looking north".</p> <p><u>QUESTION:</u> Please explain how adding ground level green space will be obstructive to views up and down the Mall between the Plaza de Panama and the Organ Pavilion. Why isn't this also true in the Project and in all alternatives since neither the statue nor the fountain will be removed?</p> <p><u>QUESTION:</u> Why are impacts considered "significant and unmitigable" in many of the alternatives as an argument against each alternative when the exact same issues are true for the Project itself?</p> <p>The DEIR states that "The intersection of El Prado/Plaza de Panama would continue to operate as LOS F". When and how often does this occur today? What documentation is there to show that this intersection operates at LOS F and when does this occur?</p> <p>The DEIR states that "High pedestrian/vehicular conflict areas and volumes, especially at the El Prado/Plaza de Panama intersection, are expected to cause considerable queuing.. anticipated to spill back to nearby adjacent intersections" (tram & valet drop-off areas). Why isn't this equally true for the Alcazar lot in the Project configuration, with the queuing and backup simply shifting to the Cabrillo Bridge/Centennial Bridge intersection and within the Alcazar lot at the drop-off & valet location?</p> </td> </tr> <tr> <td data-bbox="199 1081 443 1166">DEIR Part 1, Exec. Summary, S.5.4 & Part 4, Section 9.3.5 + Figure 9-13</td> <td data-bbox="443 1081 930 1166"> <p>Alternative 5: <u>Phased Alternative</u></p> <p>No specific comments or questions.</p> </td> </tr> <tr> <td data-bbox="199 1166 443 1268">DEIR Part 1, Section 9.2.1</td> <td data-bbox="443 1166 930 1268"> <p>Alternatives Considered But Rejected: <u>2004 Jone and Jones Land Use, Circulation and Parking Study</u></p> <p>A reason given for rejecting this alternative is that it is "much larger in scope" and "would likely be infeasible from an economic standpoint".</p> </td> </tr> </table> | Alternative 4Biv continued | <p>DEIR states this alternative's "impacts to historic resources would be significant and unmitigable" but fails to point out that the changes can easily be reversed, unlike changes for a permanent Centennial Bridge, Centennial Road and reconfigured Alcazar lot.</p> <p><u>QUESTION:</u> Why is that argument made for this alternative yet, in evaluation of the Project itself, the argument is made that the bypass, new road and reconfigured Alcazar lot could be reversed at some time in the future despite the reality that anything this massive is very unlikely to be torn down once built.</p> <p>DEIR states that "The El Cid Island component was "determined in the historical analysis as disrupting the spatial relationships in the area, could significantly alter key views, identified in the CMPP, specifically the view from the Museum of Art looking south and the view from the Organ Pavilion and the Mall looking north".</p> <p><u>QUESTION:</u> Please explain how adding ground level green space will be obstructive to views up and down the Mall between the Plaza de Panama and the Organ Pavilion. Why isn't this also true in the Project and in all alternatives since neither the statue nor the fountain will be removed?</p> <p><u>QUESTION:</u> Why are impacts considered "significant and unmitigable" in many of the alternatives as an argument against each alternative when the exact same issues are true for the Project itself?</p> <p>The DEIR states that "The intersection of El Prado/Plaza de Panama would continue to operate as LOS F". When and how often does this occur today? What documentation is there to show that this intersection operates at LOS F and when does this occur?</p> <p>The DEIR states that "High pedestrian/vehicular conflict areas and volumes, especially at the El Prado/Plaza de Panama intersection, are expected to cause considerable queuing.. anticipated to spill back to nearby adjacent intersections" (tram & valet drop-off areas). Why isn't this equally true for the Alcazar lot in the Project configuration, with the queuing and backup simply shifting to the Cabrillo Bridge/Centennial Bridge intersection and within the Alcazar lot at the drop-off & valet location?</p> | DEIR Part 1, Exec. Summary, S.5.4 & Part 4, Section 9.3.5 + Figure 9-13 | <p>Alternative 5: <u>Phased Alternative</u></p> <p>No specific comments or questions.</p> | DEIR Part 1, Section 9.2.1 | <p>Alternatives Considered But Rejected: <u>2004 Jone and Jones Land Use, Circulation and Parking Study</u></p> <p>A reason given for rejecting this alternative is that it is "much larger in scope" and "would likely be infeasible from an economic standpoint".</p> | K-31 Improvements under both Alternative 4.Biv and the project could be reversed. |
| Alternative 4Biv continued | <p>DEIR states this alternative's "impacts to historic resources would be significant and unmitigable" but fails to point out that the changes can easily be reversed, unlike changes for a permanent Centennial Bridge, Centennial Road and reconfigured Alcazar lot.</p> <p><u>QUESTION:</u> Why is that argument made for this alternative yet, in evaluation of the Project itself, the argument is made that the bypass, new road and reconfigured Alcazar lot could be reversed at some time in the future despite the reality that anything this massive is very unlikely to be torn down once built.</p> <p>DEIR states that "The El Cid Island component was "determined in the historical analysis as disrupting the spatial relationships in the area, could significantly alter key views, identified in the CMPP, specifically the view from the Museum of Art looking south and the view from the Organ Pavilion and the Mall looking north".</p> <p><u>QUESTION:</u> Please explain how adding ground level green space will be obstructive to views up and down the Mall between the Plaza de Panama and the Organ Pavilion. Why isn't this also true in the Project and in all alternatives since neither the statue nor the fountain will be removed?</p> <p><u>QUESTION:</u> Why are impacts considered "significant and unmitigable" in many of the alternatives as an argument against each alternative when the exact same issues are true for the Project itself?</p> <p>The DEIR states that "The intersection of El Prado/Plaza de Panama would continue to operate as LOS F". When and how often does this occur today? What documentation is there to show that this intersection operates at LOS F and when does this occur?</p> <p>The DEIR states that "High pedestrian/vehicular conflict areas and volumes, especially at the El Prado/Plaza de Panama intersection, are expected to cause considerable queuing.. anticipated to spill back to nearby adjacent intersections" (tram & valet drop-off areas). Why isn't this equally true for the Alcazar lot in the Project configuration, with the queuing and backup simply shifting to the Cabrillo Bridge/Centennial Bridge intersection and within the Alcazar lot at the drop-off & valet location?</p> | | | | | | | |
| DEIR Part 1, Exec. Summary, S.5.4 & Part 4, Section 9.3.5 + Figure 9-13 | <p>Alternative 5: <u>Phased Alternative</u></p> <p>No specific comments or questions.</p> | | | | | | | |
| DEIR Part 1, Section 9.2.1 | <p>Alternatives Considered But Rejected: <u>2004 Jone and Jones Land Use, Circulation and Parking Study</u></p> <p>A reason given for rejecting this alternative is that it is "much larger in scope" and "would likely be infeasible from an economic standpoint".</p> | | | | | | | |
| K-32 | | K-32 A As explained under Section 9.3.4Biv.2.c, although the El Cid Island component would change public views within a designated view corridor, the visual impact was deemed less than significant, as is true for the project and other alternatives which convert the Plaza de Panama to pedestrian open space. | | | | | | |
| A | | Both the project and the Half-Plaza Alternative would result in significant impacts associated with changes in spatial relationships of the NHLD and inconsistencies with SOI Rehabilitation Standards. These changes for both the project (as it relates to Centennial Bridge) and this alternative (El Cid Island component) would result in not only historic impacts, but impacts to the historic architectural character of the project area. | | | | | | |
| B | | B Significant and unmitigable impacts are disclosed for the project, as well as the alternatives. | | | | | | |
| K-33 | | K-33 As discussed in Section 4.4.1.3, existing traffic counts were conducted to obtain volumes within the Park and surrounding streets on a weekday 7–9 a.m. and 4–6 p.m. and on Saturday 11 a.m.–1 p.m. and 3–5 p.m. Another traffic count within the Park including pedestrian counts was conducted from 10 a.m.–8 p.m. on a Saturday. Based on the result of the counts, the intersection of El Prado/Plaza de Panama operates acceptably during the week; however, on Saturdays due to the increased number of vehicles and pedestrians, it operates at LOS F between the hours of 11 a.m.–6 p.m. See Tables 4.4-2 and 4.4-3, and also Appendix D-1. | | | | | | |

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| <p>K-34</p> <p>K-35</p> <p>K-36</p> | <p>Alternative 4Biv continued</p> | <p>DEIR states this alternative’s “impacts to historic resources would be significant and unmitigable” but fails to point out that the changes can easily be reversed, unlike changes for a permanent Centennial Bridge, Centennial Road and reconfigured Alcazar lot.</p> <p><u>QUESTION:</u> Why is that argument made for this alternative yet, in evaluation of the Project itself, the argument is made that the bypass, new road and reconfigured Alcazar lot could be reversed at some time in the future despite the reality that anything this massive is very unlikely to be torn down once built.</p> <p>DEIR states that “The El Cid Island component was “determined in the historical analysis as disrupting the spatial relationships in the area, could significantly alter key views, identified in the CMPP, specifically the view from the Museum of Art looking south and the view from the Organ Pavilion and the Mall looking north”.</p> <p><u>QUESTION:</u> Please explain how adding ground level green space will be obstructive to views up and down the Mall between the Plaza de Panama and the Organ Pavilion. Why isn’t this also true in the Project and in all alternatives since neither the statue nor the fountain will be removed?</p> <p><u>QUESTION:</u> Why are impacts considered “significant and unmitigable” in many of the alternatives as an argument against each alternative when the exact same issues are true for the Project itself?</p> <p>The DEIR states that “The intersection of El Prado/Plaza de Panama would continue to operate as LOS F”. When and how often does this occur today? What documentation is there to show that this intersection operates at LOS F and when does this occur?</p> <p>The DEIR states that “High pedestrian/vehicular conflict areas and volumes, especially at the El Prado/Plaza de Panama intersection, are expected to cause considerable queuing.. anticipated to spill back to nearby adjacent intersections” (tram & valet drop-off areas). Why isn’t this equally true for the Alcazar lot in the Project configuration, with the queuing and backup simply shifting to the Cabrillo Bridge/Centennial Bridge intersection and within the Alcazar lot at the drop-off & valet location?</p> | <p>K-34 This statement from the EIR is specifically referring to Alternatives 4Biii (Modified Precise Plaza without Parking Structure) and 4Biv (Half Plaza). These alternatives would introduce new tram and valet drop-off areas just south of El Prado/Plaza de Panama intersection while still maintaining the same number of vehicles and pedestrians as existing conditions which already operates at LOS F. With the project, the reconfigured Alcazar parking lot would have a designated valet operation area in the south and southeast portion of the parking lot which would be separated from the through traffic on Centennial Road. The passenger drop-off/pick-up area would also be in its own designated space in the northern portion of the lot, away from through traffic where the passengers would not encounter the through traffic on Centennial Road. Overall, implementation of the project would result in fewer pedestrians crossing the road from these drop-off locations, than currently exists at the El Prado/Plaza de Panama. The total combined pedestrians crossing at the proposed Alcazar location could be 230 during a peak hour on a typical Saturday. Under existing conditions, a combined total of 780 pedestrians could be crossing at the Plaza during a peak hour on a typical Saturday.</p> <p>K-35 Comment noted.</p> <p>K-36 Comment noted.</p> |
| | <p>DEIR Part 1, Exec. Summary, S.5.4 & Part 4, Section 9.3.5 + Figure 9-13</p> | <p>Alternative 5: <u>Phased Alternative</u> No specific comments or questions.</p> | |
| | <p>DEIR Part 1, Section 9.2.1</p> | <p>Alternatives Considered But Rejected: <u>2004 Jone and Jones Land Use, Circulation and Parking Study</u> A reason given for rejecting this alternative is that it is “much larger in scope” and “would likely be infeasible from an economic standpoint”.</p> | |

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| K-37 | 2004 J&J Study continued | <p>QUESTION: Why must this excellent study be seen as an "All or Nothing" plan even though there are elements within it which could be adapted to achieve some of the goals regarding parking and traffic circulation?</p> <p>All of the reasons given for rejection of this as an alternative assume this "All or Nothing" approach and seem more for the purpose of supporting rejection of detailed analysis in competition to the Proposed Project Plan.</p> | <p>K-37 As part of the NOP process, the City solicited alternatives for inclusion in the EIR. Based on this public input, the EIR fully addressed 13 alternatives and considered but rejected an additional 8 alternatives. Thus, the City provided consideration of a reasonable range of alternatives, including those suggested by the public. In some instances, the alternatives suggested by the public did not contain detailed descriptions or certain aspects were ambiguous; therefore, certain assumptions were made and identified in the alternatives analysis.</p> |
| K-38 A | DEIR Part 2, Sec. 3.4.3.1, Project Description, Centennial Bridge, Fig. 3-12 & Appendix C, Centennial Bridge Photographic Survey, Photo Location 17 | <p>Whereas it says Centennial Bridge would be designed to minimize its visibility, there is inconsistency between illustrations of the bridge in so far as the portion above the roadway. In the Typical Section view in Figure 3-12 there are raised concrete barriers between the pedestrian walkway and the roadway and along the inside radius of the bridge. However, the illustration of the Existing Condition with Rendering of Centennial Bridge on the page Photo Location 17 of the Centennial Bridge Photographic Survey seems to show only the see-through railing on the outside radius.</p> | <p>K-38 A All simulations contained within the Centennial Bridge Photographic Survey show the solid concrete barrier. In the simulations that are taken from below the bridge level the concrete barrier (which is setback 8 feet from the see-through railing) would not be visible from those locations. This would explain the differences identified in this comment.</p> |
| B | | <p>Additionally, it appears that all of the renderings in the Centennial Bridge Photographic Survey that show the bridge omit the lighting standards that are on the bridge according to Figure 3-12.</p> | <p>B For clarification purposes, Light Standards have been added to all simulations.</p> |
| K-39 | DEIR Part 2, Sec. 3.4.3.2, Project Description, Centennial Road & Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Centennial Road & Appendix B-1, Sec. VIII, part D., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Evaluation of the Project Pursuant to the Secretary of the Interior's Standards, Cabrillo Bridge and Centennial Road | <p>It is unclear what changes are to be made to the 1970s Palm Canyon Walkway which is an existing raised wood pedestrian path that connects the Alcazar parking lot with the Mall. Section 3.4.3.2 says it is to be realigned. Appendix B-1, Section VIII, part A implies it will be retained and extended, saying: The boardwalk that would run inside the eastern rim of Palm Canyon, from the existing 1976-era boardwalk to a new "Palm Canyon Overlook" that would be constructed near the site of the existing toilet room. Appendix B-1, Section VIII, part D says this will be a beneficial addition and be compatible, but no more detail is provided. Details are needed for the boardwalk/bridge and new overlook in order to assess the impacts of those developments.</p> | <p>K-39 The existing Palm Canyon walkway would remain in its current location between the Alcazar Garden and the proposed Centennial Roadway. The deck surface would be re-furbished and adjusted as necessary to make it comply with all ADA requirements. In addition, the Palm Canyon Walkway would be extended to the International Cottages and would be similar in design and appearance to the existing walkway. The proposed overlook would be located just north of intersection of Pan American Place and Pan American Road West. Currently this location has been previously disturbed to accommodate an attached concrete stairway adjacent to the roadway and a dirt pathway leading down into Palm Canyon.</p> |
| K-40 | DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot, Fig. 3-17, Proposed Alcazar Parking Lot Redesign & Sec. 4.2, Environmental Analysis, Historical Resources | <p>What is the significance, if any, of the "Historic Bridge Abutment" shown in Figure 3-17. It appears in the figure (both in the Existing Condition, where it is identified, and in the Parking Lot Redesign graphics), but it is not discussed in the text of Section 4.2.</p> | <p>The proposed layout of the Palm Canyon walk extension has been designed to minimize the impact on the underlying vegetation and existing trees. During construction, minor adjustment to the alignment may result to further minimize impacts on existing vegetation.</p> |
| | | | <p>K-40 The Historic Bridge Abutment refers to the stone stair remnants of the former 1935 Honeymoon Bridge that once spanned the center of Palm Canyon. There is a similar abutment on the other side of Palm Canyon, south of the restrooms. The bridge is mentioned in the Historic Resources Technical Report. This feature is not being impacted by the project.</p> |

LETTER

RESPONSE

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| K-41 | DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot & DEIR Part 2, Sec. 3.4.7.3 a, Project Description, Parking, Proposed Parking Changes | A concise detail of the valet parking operation does not appear anywhere. Is this to be a "permanent" system? Limited or 7 days-24 hours? Will valet parking spaces be available to the general public when the system is not operating? | K-41 Valet service is currently provided during limited hours/days based on demand. Prior to initiation of valet services in the new Alcazar parking lot final operational plans must be reviewed and approved through the City's permitting process. |
| K-42 | DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot, Fig. 3-19, Proposed ADA Accessible Routes & DEIR Part 2, Sec. 3.4.7.3 a, Project Description, Parking, Proposed Parking Changes, Fig. 3-32, Proposed Pedestrian Circulation | Figures 3-19 shows no ADA access along El Prado through the Plaza de California, implying that one must use the Centennial Bridge for access to the Central Mesa area. Figure 3-32 shows no general (non-ADA) access along that route. Is that intended? | K-42 For clarification purposes, Figure 3-19 has been revised to show the Plaza de California as an accessible plaza and to illustrate an uninterrupted ADA accessible path of travel from the western end of the Cabrillo Bridge through the Plaza de California. This revision to the Final EIR provides clarification and consistency between text and graphics. |
| K-43 | DEIR Part 2, Sec. 3.4.6.2, Project Description, Rooftop Park | Balboa Park already has a Visitor Center. Are there to be two? What are the benefits and impacts of one versus two or one versus the other? | K-43 Under the project, an annex to the existing visitor center is proposed on the rooftop park. This location is centrally located in the Palisades area. The benefits of providing a second visitor center would be to provide services to visitors in this centralized portion of the Park. Moreover, the location of the proposed center conforms to the CMPP which includes a Palisades visitor center. |
| K-44 | DEIR Part 2, Sec. 3.4.6.2, Project Description, Rooftop Park & Appendix B-1, Sec. VIII, part A, Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Parking Structure, Rooftop Park and Tram | Elaboration and illustration of the Visitor Center is needed to appraise its visual impact and architectural/historical appropriateness for the Park. | K-44 The Site Development Permit Plans provide details of the visitors center including elevations of all the buildings. It was determined that while the visitor center would be described in the EIR, site plan figures would not be included. This decision was based on the fact that these plans were not necessary to determine visual or historical impacts because they are proposed to be located in areas that do not contribute to the NHLD. Final designs of the visitor center will be reviewed by the Balboa Park Committee for comment, and construction plans will be approved by City staff prior to issuance of construction permits. The Site Development Plans are available for review at the City Department of Development Services. |
| K-45 | DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park | Please provide further details on the food service anticipated at the Visitor Center. It is said to include park user related services, beverages, and snacks. Please compare this quantitatively with bar or with restaurant service. That is, patron capacity, kitchen staffing, hours open, inclusion of table service, etc. | K-45 The proposed visitor center would provide a similar level of service as the existing center. Specifically, the extent of food service is intended to consist of pre-packaged items (snacks and beverages). Removable tables and chairs may also be provided. Operational details will be reviewed and approved by City staff prior to issuance of appropriate permits. |
| | DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park | The size of the new public restroom is given in floor area. It should be compared to the restroom it replaces (the 1990s restroom being removed near the International Cottages). The area of the old restroom is needed for such a comparison, and the comparison would be even more useful if given in restroom capacity in numbers of simultaneous users. Further comparison should be made to the distance to the closest restrooms under the existing and proposed layouts for patrons of the Organ Pavilion and for visitors to the International Cottages. Please comment on the changed layout given that during intermissions at the most popular summer organ concerts the existing restroom is significantly inadequate. | |

LETTER

RESPONSE

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| <p>DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot & DEIR Part 2, Sec. 3.4.7.3 a, Project Description, Parking, Proposed Parking Changes</p> | <p>A concise detail of the valet parking operation does not appear anywhere. Is this to be a "permanent" system? Limited or 7 days-24 hours? Will valet parking spaces be available to the general public when the system is not operating?</p> |
| <p>DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot, Fig. 3-19, Proposed ADA Accessible Routes & DEIR Part 2, Sec. 3.4.7.3 a, Project Description, Parking, Proposed Parking Changes, Fig. 3-32, Proposed Pedestrian Circulation</p> | <p>Figures 3-19 shows no ADA access along El Prado through the Plaza de California, implying that one must use the Centennial Bridge for access to the Central Mesa area. Figure 3-32 shows no general (non-ADA) access along that route. Is that intended?</p> |
| <p>DEIR Part 2, Sec. 3.4.6.2, Project Description, Rooftop Park</p> | <p>Balboa Park already has a Visitor Center. Are there to be two? What are the benefits and impacts of one versus two or one versus the other?</p> |
| <p>DEIR Part 2, Sec. 3.4.6.2, Project Description, Rooftop Park & Appendix B-1, Sec. VIII, part A, Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Parking Structure, Rooftop Park and Tram</p> | <p>Elaboration and illustration of the Visitor Center is needed to appraise its visual impact and architectural/historical appropriateness for the Park.</p> |
| <p>DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park</p> | <p>Please provide further details on the food service anticipated at the Visitor Center. It is said to include park user related services, beverages, and snacks. Please compare this quantitatively with bar or with restaurant service. That is, patron capacity, kitchen staffing, hours open, inclusion of table service, etc.</p> |
| <p>DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park</p> | <p>The size of the new public restroom is given in floor area. It should be compared to the restroom it replaces (the 1990s restroom being removed near the International Cottages). The area of the old restroom is needed for such a comparison, and the comparison would be even more useful if given in restroom capacity in numbers of simultaneous users.</p> <p>Further comparison should be made to the distance to the closest restrooms under the existing and proposed layouts for patrons of the Organ Pavilion and for visitors to the International Cottages. Please comment on the changed layout given that during intermissions at the most popular summer organ concerts the existing restroom is significantly inadequate.</p> |

K-46

K-46 The proposed restroom is 1,385 square feet (sf) compared to the current restroom which is 1,340 sf. The number of toilets/urinals would increase from 23 to 26. The number of sinks would increase from 11 to 12. In addition, the new facility would have two diaper changing stations whereas the current facility has none.

The distance from the west entrance of the Organ Pavilion to the entrance of the proposed restroom would be 185 feet compared to the current distance of 120 feet. The distance from the entrance of the House of Pacific Relations to the entrance of the proposed restroom would be 290 feet compared to the current distance of 241 feet. The pedestrian path of travel to the existing restroom crosses vehicular traffic, whereas the path of travel to the proposed restroom would not, from either of the above reference points.

LETTER

RESPONSE

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| K-47 | <p>DEIR Part 2, Sec. 3.4.6.3, Project Description, Tram, Fig. 3-29 & Appendix D-2, Parking Demand Study, Proposed Tram Vehicle, Fig. 15 & Appendix H, Greenhouse Gas Emissions Analysis</p> | <p>It appears that a tram design has been selected, according to the text and Figure 3-29, Example of Proposed Tram. According to Appendix D-2, Figure 15, Proposed Tram Vehicle, these will be fossil fuel-powered (gasoline, diesel or liquid propane, according to the text in the figure). Environmental impacts would seem to be minimized if such trams were to be electric battery-powered. Has this been considered? If not, it should be evaluated. Several manufacturers of electric passenger busses have commercial offerings (examples: www.zondausa.com, www.tecnobus.it)</p> <p>It says in Section 3.4.6.2 that the 1915 trams consisted of small tractors pulling trailers with back-to-back benches. The historical record also describes smaller battery-powered, apparently wicker basket-like vehicles (see Appendix C, Centennial Bridge Photographic Survey, Photo Location 17, Historic Photo). Therefore, making the trams electric battery-powered would have historic precedent.</p> <p>Appendix H on greenhouse gasses does not discuss emissions related to the tram. The emissions from tram options other than the chosen fossil-fuel vehicle should be quantitatively compared.</p> | <p>K-47 Electrical powered trams would be unable to satisfy operational demands of duration of usage and power requirements, as needed to successfully run throughout the proposed tram route. The vehicle examples offered in this comment are for limited capacity shuttle buses. The proposed tram vehicle would need to offer efficient loading/unloading and be high occupancy based on the proposed operation. The vehicle proposed by the project would meet its anticipated needs for high-occupancy operational demands over differential terrain while utilizing liquid propane. While a petroleum-based product, liquid propane is one of the cleanest burning of all fossil fuels.</p> |
| K-48 | <p>DEIR Part 3, Sec. 4.1.3.1, part B, Environmental Analysis, Land Use, Impacts, Plan Consistency, Consistency with the Balboa Park Master Plan, Table 4.1-2 & DEIR Part 3, Sec. 4.1.3.1, part C, Environmental Analysis, Land Use, Impacts, Plan Consistency, Consistency with the Central Mesa Precise Plan, Table 4.1-3</p> | <p>Both the Balboa Park Master Plan of 1989 and the Central Mesa Precise Plan of 1992 call for an Organ Pavilion parking lot to provide between 1,000 and 1,500 spaces. The tables say this project's parking structure would be approximately 202 spaces short of the minimum number. Furthermore, it would be only 39% of the desired maximum. The EIR says that to accommodate 1,000 spaces, a fourth subterranean level would be required. The depth of this level would pose substantial engineering constraints, including shoring, mechanical ventilation, and special fire protection parameters. Accommodation of the full 1,500 is not addressed.</p> <p>A) In consideration of the goals of the two Plans, this deviation requires further justification. Quantitative tables of cost – benefit (i.e.- parking spaces) should be provided. B) There should be at least discussion, if not alternative analysis, of the option to build a parking structure that would later be expandable to 1,000 or 1,500 spaces.</p> | <p>K-48 A The level of details provided in the CMPP regarding the parking structure is very limited, so a side-by-side comparison of costs is not feasible. Generally speaking, construction of an underground mechanically ventilated parking structure would cost on average \$30K - \$35K per stall. The parking structure construction cost for the project is estimated at \$19K per stall, to meet the project's objective to build a financially self-sustaining parking structure that would not be encumbered by the need for mechanical ventilation. The parking count was based partly on cost, but mostly on-site logistics including attainable footprint, site constraints, and maximum efficient stall capacity determined per level. Also the number of parking levels was based on surrounding grade limits that would allow for an open elevation on the East without impacting required access.</p> |
| A | | | <p>B Expanded parking opportunities at various Park locations would not be precluded by the project, but are beyond its scope.</p> |
| B | | | |
| K-49 | <p>DEIR Part 3, Sec. 4.4.4.1.b Environmental Analysis, Transportation/Circulation and Parking, Operation Impacts</p> | <p>The comparison of the proposed paid parking structure with the recently constructed underground parking in Golden Gate Park is illegitimate insofar as public acceptance of parking fees and projected garage utilization. This is because the underground parking in Golden Gate Park is located immediately between the two museums (Academy of Sciences and de Young Museum) that attract the users. The garage and the two museums are even connected underground, providing the most direct access and</p> | <p>K-49 The relevance of the comparison between the project and the underground parking in Golden Gate Park is based on the project's parking structure location in the same location as the Organ Pavilion parking lot, which is the closest and largest parking lot to the central core of museums.</p> |
| | | | <p>In addition, the Organ Pavilion parking lot is currently one of the most highly occupied lots within the Central Mesa.</p> |

LETTER

RESPONSE

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| K-50 | <table border="1"> <tr> <td data-bbox="197 279 438 402"></td> <td data-bbox="438 279 930 402"> <p>weather protection when needed. This weighs heavily in the reported by the San Francisco garage's operator in the EIR. By comparison the proposed Balboa Park parking structure is a significant outdoor walking distance from any of the museums and similar attractions it supposedly will serve.</p> </td> </tr> <tr> <td data-bbox="197 402 438 651"> <p>DEIR Part 3, Sec. 4.1.2.1, part C, Environmental Analysis, Land Use, Impacts, ESL Regulations, Fig 4.1-9, ESL Slope Impact Exhibit & Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Alcazar Parking Lot and Walkway</p> </td> <td data-bbox="438 402 930 651"> <p>Please provide elevation diagrams or graphics to explain the re-contouring of the Alcazar Parking Lot, particularly the grading and retaining walls, as described in Appendix B-1: Some new grading would occur along the north rim of Palm Canyon ... and sections of the western and southern edges of Alcazar Parking Lot would require the construction of retaining walls. Retaining walls constructed on the west side of the parking lot (facing Cabrillo Canyon) would range from 20' to 28' high. Section 4.1.2.1 and Figure 4.1-9 only identify qualifying "steep slopes".</p> </td> </tr> </table> | | <p>weather protection when needed. This weighs heavily in the reported by the San Francisco garage's operator in the EIR. By comparison the proposed Balboa Park parking structure is a significant outdoor walking distance from any of the museums and similar attractions it supposedly will serve.</p> | <p>DEIR Part 3, Sec. 4.1.2.1, part C, Environmental Analysis, Land Use, Impacts, ESL Regulations, Fig 4.1-9, ESL Slope Impact Exhibit & Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Alcazar Parking Lot and Walkway</p> | <p>Please provide elevation diagrams or graphics to explain the re-contouring of the Alcazar Parking Lot, particularly the grading and retaining walls, as described in Appendix B-1: Some new grading would occur along the north rim of Palm Canyon ... and sections of the western and southern edges of Alcazar Parking Lot would require the construction of retaining walls. Retaining walls constructed on the west side of the parking lot (facing Cabrillo Canyon) would range from 20' to 28' high. Section 4.1.2.1 and Figure 4.1-9 only identify qualifying "steep slopes".</p> | <p>K-50 Sheets 5, 26, and 27 of Site Development Permit Plans show elevations, profiles, and perspective views of the Centennial Bridge, Alcazar parking lot, and Centennial Road, respectively. Plans are available at the City's Department of Development Services for public review.</p> |
| | <p>weather protection when needed. This weighs heavily in the reported by the San Francisco garage's operator in the EIR. By comparison the proposed Balboa Park parking structure is a significant outdoor walking distance from any of the museums and similar attractions it supposedly will serve.</p> | | | | | |
| <p>DEIR Part 3, Sec. 4.1.2.1, part C, Environmental Analysis, Land Use, Impacts, ESL Regulations, Fig 4.1-9, ESL Slope Impact Exhibit & Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Alcazar Parking Lot and Walkway</p> | <p>Please provide elevation diagrams or graphics to explain the re-contouring of the Alcazar Parking Lot, particularly the grading and retaining walls, as described in Appendix B-1: Some new grading would occur along the north rim of Palm Canyon ... and sections of the western and southern edges of Alcazar Parking Lot would require the construction of retaining walls. Retaining walls constructed on the west side of the parking lot (facing Cabrillo Canyon) would range from 20' to 28' high. Section 4.1.2.1 and Figure 4.1-9 only identify qualifying "steep slopes".</p> | | | | | |
| K-51 | <table border="1"> <tr> <td data-bbox="197 651 438 813"> <p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p> </td> <td data-bbox="438 651 930 813"> <p>For each of these alternatives a reason for rejection is that the alternative would not meet Objective 6 - complete implementation by 2015. The desire to finish by the time of the Panama-California Exposition centennial is understood. However, this is an inappropriate criterion for evaluation of environmental impact. (Quite the contrary to assigning benefit to an alternative appearing to meet Objective 6, overly accelerated construction could have negative environmental impacts.)</p> </td> </tr> </table> | <p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p> | <p>For each of these alternatives a reason for rejection is that the alternative would not meet Objective 6 - complete implementation by 2015. The desire to finish by the time of the Panama-California Exposition centennial is understood. However, this is an inappropriate criterion for evaluation of environmental impact. (Quite the contrary to assigning benefit to an alternative appearing to meet Objective 6, overly accelerated construction could have negative environmental impacts.)</p> | <p>K-51 The project objectives identified in Section 3.1 do not necessarily relate to the environment and instead relate to the underlying purpose of the project. In particular, project objectives are not intended to comprise criteria for evaluation of environmental impacts. As a result, completing a project by a specific date is a permissible project objective.</p> | | |
| <p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p> | <p>For each of these alternatives a reason for rejection is that the alternative would not meet Objective 6 - complete implementation by 2015. The desire to finish by the time of the Panama-California Exposition centennial is understood. However, this is an inappropriate criterion for evaluation of environmental impact. (Quite the contrary to assigning benefit to an alternative appearing to meet Objective 6, overly accelerated construction could have negative environmental impacts.)</p> | | | | | |
| K-52 | <table border="1"> <tr> <td data-bbox="197 813 438 878"> <p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p> </td> <td data-bbox="438 813 930 878"> <p>Why was an Archery Canyon parking structure not considered?</p> </td> </tr> <tr> <td data-bbox="197 878 438 1252"> <p>Sec. 9.2.5, Project Alternatives, Alternatives Considered but Rejected, Quince Street Access Alternative</p> </td> <td data-bbox="438 878 930 1252"> <p>This alternative was not considered for further analysis due to the increased scope of improvements, requirement for excessive retaining walls and extent of grading operations and landform alteration.</p> <p>A. Since this proposal has been seriously considered in the past (Balboa Park Development and Management Plan, Pekarek Group, 1983), and since the San Diego Zoo has numerous roads in the same terrain that did not require such retaining walls as this rejected alternative, there is a question about the assumptions concerning the roadway engineering. Is the road design a standard, fully conforming roadway (sidewalks, bike lanes) or a more "park-like" road?</p> <p>B. In the same context, would the retaining walls, grading operations and landform alteration be significantly lower and even acceptable if the Quince Street access were one-way (eastbound) into the Park?</p> </td> </tr> </table> | <p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p> | <p>Why was an Archery Canyon parking structure not considered?</p> | <p>Sec. 9.2.5, Project Alternatives, Alternatives Considered but Rejected, Quince Street Access Alternative</p> | <p>This alternative was not considered for further analysis due to the increased scope of improvements, requirement for excessive retaining walls and extent of grading operations and landform alteration.</p> <p>A. Since this proposal has been seriously considered in the past (Balboa Park Development and Management Plan, Pekarek Group, 1983), and since the San Diego Zoo has numerous roads in the same terrain that did not require such retaining walls as this rejected alternative, there is a question about the assumptions concerning the roadway engineering. Is the road design a standard, fully conforming roadway (sidewalks, bike lanes) or a more "park-like" road?</p> <p>B. In the same context, would the retaining walls, grading operations and landform alteration be significantly lower and even acceptable if the Quince Street access were one-way (eastbound) into the Park?</p> | <p>K-52 A Comment noted.</p> <p>B See response to comment S-7.</p> <p>C A slight reduction in retaining wall heights and grading operations would result if Quince Street access was reduced to a one-way road width; however, the landform alterations and visual impacts would still result in a significant impact.</p> |
| <p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p> | <p>Why was an Archery Canyon parking structure not considered?</p> | | | | | |
| <p>Sec. 9.2.5, Project Alternatives, Alternatives Considered but Rejected, Quince Street Access Alternative</p> | <p>This alternative was not considered for further analysis due to the increased scope of improvements, requirement for excessive retaining walls and extent of grading operations and landform alteration.</p> <p>A. Since this proposal has been seriously considered in the past (Balboa Park Development and Management Plan, Pekarek Group, 1983), and since the San Diego Zoo has numerous roads in the same terrain that did not require such retaining walls as this rejected alternative, there is a question about the assumptions concerning the roadway engineering. Is the road design a standard, fully conforming roadway (sidewalks, bike lanes) or a more "park-like" road?</p> <p>B. In the same context, would the retaining walls, grading operations and landform alteration be significantly lower and even acceptable if the Quince Street access were one-way (eastbound) into the Park?</p> | | | | | |
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LETTER

RESPONSE

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| K-53 | DEIR Part 4, Sec. 9.2.6, Project Alternatives, Alternatives Considered but Rejected, Old Globe Way Parking Structure Alternative | This alternative was not considered for further analysis due to creating a bottleneck during peak arrival/exit times. (This is presumed to apply principally to the Old Globe Theater productions.) There should be more detailed justification for this assertion concerning the Old Globe Way Parking Structure alternative compared to the proposed Organ Pavilion parking structure and the Centennial roadway. Will they both not experience bottlenecks during peak arrival/exit times? (In the case of the Organ Pavilion parking structure more so with respect to events at the Organ Pavilion.) | K-53 | Due to the physical constraints of the Park in this alternative's location, there would be no exclusive turn lanes for the Old Globe Way parking structure, as is provided with the project's Centennial Road, thereby limiting in/out traffic movements which would result in queuing/stacking of vehicle impacts. |
| K-54 | DEIR Part 4, Sec. 9.2.8, Project Alternatives, Alternatives Considered but Rejected, Sixth Avenue Bridge Extension | This alternative is said to have an unacceptable visual impact because of the need to construct a new bridge over SR-163, which is a Scenic Highway Corridor. This incorrectly assumes that the visual impacts will be negative. To be fair, any such conclusion requires more details about the design of the new bridge. | K-54 | Pursuant to CEQA Guidelines Section 15126.6(c) alternatives considered but rejected as infeasible require only a brief explanation of the reasons for the alternative's rejection. |
| K-55 | DEIR Part 4, Sec. 9.3.2.2.a.Issue 2, Project Alternatives, Alternatives Fully Analyzed, No Project/Central Mesa Precise Plan Alternative, Environmental Analysis of the Central Mesa Precise Plan Alternative, Land Use, Plan Consistency & Table 9-1, Comparison of Project and Alternatives Impacts Summary | It is not reasonable that the Central Mesa Precise Plan alternative is considered other than fully in conformance under Plan Consistency. It is the current adopted plan, is it not? | K-55 | The CMPP, adopted in 2001, is the existing plan governing development and operations within the Central Mesa portion of Balboa Park. A Supplemental EIR was certified for the CMPP. The EIR found that the CMPP was inconsistent with a primary goal of the Balboa Park Master Plan, adopted in 1989, and the overarching policy document governing the development, use and operations within the Park. This inconsistency is discussed in detail in Section 9.3.2.2, Issue a(2). |
| K-56 | DEIR Part 4, Sec. 9.3.3A.2.a.Issue 4, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Environmental Analysis of the No New Parking Structure Alternative, Land Use, San Diego International Airport ALUCP Compatibility & Table 9-1, Comparison of Project and Alternatives Impacts Summary | It is unreasonable that this alternative would be inconsistent with the SDIA ALUCP, since it is obvious that there would be no impacts if there are no new structures or parking areas. | K-56 | The EIR does not suggest that this alternative would be inconsistent with the SDIA ALUCP. Section 9.3.3A.2 finds impacts associated with this issue less than significant. |
| K-57 | DEIR Part 4, Sec. 9.3.3A.3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized | It is concluded that this alternative would have greater traffic impacts compared to the reference project and other alternatives. This appears to be true, but it should be noted that these impacts are almost entirely at intersections outside the Park. Thus the | K-57 | Under Alternative 3A, Cabrillo Bridge Pedestrianized, there would be two intersections (Presidents Way/Federal parking lot and Presidents Way/Organ Pavilion parking lot) and one road segment (Presidents Way west of Park Boulevard) within the Park which would be significantly impacted in year 2030 in addition to locations outside Balboa Park which would be impacted. |

LETTER

RESPONSE

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| | <table border="1"> <tr> <td data-bbox="199 277 436 402"> <p>Alternatives, Conclusion Regarding the No New Parking Structure Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary</p> </td> <td data-bbox="436 277 1045 402"> <p>impact on Park environment and user experience in the Park will be negligible.</p> </td> </tr> <tr> <td data-bbox="199 402 436 776"> <p>K-58 DEIR Part 4, 9.3.3D.1, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Description of the Inspiration Point Parking Structure Alternative & DEIR Part 4, 9.3.3D.2.d.Issue 3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Environmental Analysis of the Inspiration Point Parking Structure Alternative, Transportation/Circulation and Parking, Parking</p> </td> <td data-bbox="436 402 1045 776"> <p>A. There does not seem to be a basis for the sizing of the Inspiration Point Parking Structure. An observation is that there is space for a larger parking structure at Inspiration Point than at the Organ Pavilion, and so there needs to be justification why the size is the same as the proposed Organ Pavilion underground structure.</p> <p>B. A more useful analysis would be comparison of an above-ground Inspiration Point with the subterranean Organ Pavilion parking structure where the number of parking spaces would be determined for each of the two on the basis of the same total structure cost, or based on the actual capacity for each site.</p> </td> </tr> <tr> <td data-bbox="199 776 436 1011"> <p>K-59 DEIR Part 4, 9.3.4Bi.3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Conclusion Regarding the Tunnel Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary</p> </td> <td data-bbox="436 776 1045 1011"> <p>The summary comparison of this Tunnel alternative ascribes as negative factors that it would not remove vehicles from El Prado or Plaza de California (portion of Objective 1), or restore pedestrian and park uses to El Prado and Plaza de California (portion of Objective 2). However, this alternative would go a long way towards those goals for the Plaza de Panama, and an open, pedestrian-friendly Plaza de Panama is the centerpiece of the whole project. This is a glass half-empty, half-full situation. The negative tone of this conclusion should be tempered.</p> </td> </tr> <tr> <td data-bbox="199 1011 436 1198"> <p>K-60 Appendix D-1, Balboa Park Plaza De Panama Circulation & Parking Structure Project Traffic Analysis, Pedestrianize Cabrillo Bridge Alternatives & Tables 195, 196, 197 & 198 Mitigation Summaries</p> </td> <td data-bbox="436 1011 1045 1198"> <p>The analyses which conclude that there will be significant traffic impacts on Sixth Avenue are faulty if they do not address the traffic patterns of drivers from Interstate 5. Those arrive today using the Laurel Street exit anticipate use of Cabrillo Bridge. They will not approach the Park from the west when they know Cabrillo Bridge is closed to autos.</p> </td> </tr> </table> | <p>Alternatives, Conclusion Regarding the No New Parking Structure Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary</p> | <p>impact on Park environment and user experience in the Park will be negligible.</p> | <p>K-58 DEIR Part 4, 9.3.3D.1, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Description of the Inspiration Point Parking Structure Alternative & DEIR Part 4, 9.3.3D.2.d.Issue 3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Environmental Analysis of the Inspiration Point Parking Structure Alternative, Transportation/Circulation and Parking, Parking</p> | <p>A. There does not seem to be a basis for the sizing of the Inspiration Point Parking Structure. An observation is that there is space for a larger parking structure at Inspiration Point than at the Organ Pavilion, and so there needs to be justification why the size is the same as the proposed Organ Pavilion underground structure.</p> <p>B. A more useful analysis would be comparison of an above-ground Inspiration Point with the subterranean Organ Pavilion parking structure where the number of parking spaces would be determined for each of the two on the basis of the same total structure cost, or based on the actual capacity for each site.</p> | <p>K-59 DEIR Part 4, 9.3.4Bi.3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Conclusion Regarding the Tunnel Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary</p> | <p>The summary comparison of this Tunnel alternative ascribes as negative factors that it would not remove vehicles from El Prado or Plaza de California (portion of Objective 1), or restore pedestrian and park uses to El Prado and Plaza de California (portion of Objective 2). However, this alternative would go a long way towards those goals for the Plaza de Panama, and an open, pedestrian-friendly Plaza de Panama is the centerpiece of the whole project. This is a glass half-empty, half-full situation. The negative tone of this conclusion should be tempered.</p> | <p>K-60 Appendix D-1, Balboa Park Plaza De Panama Circulation & Parking Structure Project Traffic Analysis, Pedestrianize Cabrillo Bridge Alternatives & Tables 195, 196, 197 & 198 Mitigation Summaries</p> | <p>The analyses which conclude that there will be significant traffic impacts on Sixth Avenue are faulty if they do not address the traffic patterns of drivers from Interstate 5. Those arrive today using the Laurel Street exit anticipate use of Cabrillo Bridge. They will not approach the Park from the west when they know Cabrillo Bridge is closed to autos.</p> | <p>K-58 See response to comment K-11.</p> <p>K-59 Comment noted.</p> <p>K-60 The closed bridge alternatives would include travel patterns of drivers approaching from I-5 as well as reroutes on the local surrounding streets; however, a very small percentage would continue to approach from Laurel Street and turn right or left onto Sixth Avenue with the exception of the West Mesa Parking Structure Alternative which would be accessed on Balboa Drive via Sixth Avenue. See trip distribution exhibits in the TIA for these alternatives (Exhibits 32, 40, 48, and 56).</p> |
| <p>Alternatives, Conclusion Regarding the No New Parking Structure Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary</p> | <p>impact on Park environment and user experience in the Park will be negligible.</p> | | | | | | | | | |
| <p>K-58 DEIR Part 4, 9.3.3D.1, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Description of the Inspiration Point Parking Structure Alternative & DEIR Part 4, 9.3.3D.2.d.Issue 3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Environmental Analysis of the Inspiration Point Parking Structure Alternative, Transportation/Circulation and Parking, Parking</p> | <p>A. There does not seem to be a basis for the sizing of the Inspiration Point Parking Structure. An observation is that there is space for a larger parking structure at Inspiration Point than at the Organ Pavilion, and so there needs to be justification why the size is the same as the proposed Organ Pavilion underground structure.</p> <p>B. A more useful analysis would be comparison of an above-ground Inspiration Point with the subterranean Organ Pavilion parking structure where the number of parking spaces would be determined for each of the two on the basis of the same total structure cost, or based on the actual capacity for each site.</p> | | | | | | | | | |
| <p>K-59 DEIR Part 4, 9.3.4Bi.3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Conclusion Regarding the Tunnel Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary</p> | <p>The summary comparison of this Tunnel alternative ascribes as negative factors that it would not remove vehicles from El Prado or Plaza de California (portion of Objective 1), or restore pedestrian and park uses to El Prado and Plaza de California (portion of Objective 2). However, this alternative would go a long way towards those goals for the Plaza de Panama, and an open, pedestrian-friendly Plaza de Panama is the centerpiece of the whole project. This is a glass half-empty, half-full situation. The negative tone of this conclusion should be tempered.</p> | | | | | | | | | |
| <p>K-60 Appendix D-1, Balboa Park Plaza De Panama Circulation & Parking Structure Project Traffic Analysis, Pedestrianize Cabrillo Bridge Alternatives & Tables 195, 196, 197 & 198 Mitigation Summaries</p> | <p>The analyses which conclude that there will be significant traffic impacts on Sixth Avenue are faulty if they do not address the traffic patterns of drivers from Interstate 5. Those arrive today using the Laurel Street exit anticipate use of Cabrillo Bridge. They will not approach the Park from the west when they know Cabrillo Bridge is closed to autos.</p> | | | | | | | | | |

LETTER

RESPONSE

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|------|--|---|---|
| K-61 | <p>TRANSPORTATION, CIRCULATION & PARKING (Part 1, Conclusions, p.6, 8) (Part 3, Section 4.4, pp. 197-251) (Appendices D-1, D-2, D-3)</p> | <p>COMMENT: With an indisputable list of non-mitigable impacts relative to both City planning documents and Secretary of the Interior Standards, the proposed project places higher value on the private automobile over aesthetics and the tangible and intangible values of a National Landmark designation.</p> | K-61 Comment noted. |
| K-62 | | <p>QUESTION: Where will the parking behind the Organ Pavilion be accommodated during construction? The parking from the Alcazar lot?</p> | K-62 Based on existing parking occupancy counts, the Federal/Aerospace and Inspiration Point parking lots would have parking spaces available to accommodate the spaces lost at the Organ Pavilion parking lot during construction. |
| K-63 | <p>1. DEIR Part 1, Conclusions, p.6, states that the proposed project will create significant but mitigable impacts on transportation, circulation and parking.</p> | <p>QUESTION: If the Project would not add traffic to external roadways, why does the DEIR do such exhaustive analyses of external roads and intersections, extending to downtown (A Street) and Robinson @ Sixth and @ Park Blvd.?</p> | The proposed parking structure would be completed and operational before Phase III begins. Parking eliminated from the Alcazar parking lot during Phase III would be accommodated in the new parking structure or existing free lots. |
| K-64 | <p>2. "The project would not add any traffic to external roadways or redistribute external traffic."</p> | <p>QUESTION: Won't the 2030 traffic increase projections occur with or without the proposed project? Why analyses of other intersections beyond the President's Way / Centennial Road impacts? The differences, in some cases, are minimal.</p> | K-63 It is standard when preparing a traffic study to analyze the area potentially impacted by a project, including surrounding streets, to understand existing conditions and forecast future scenarios. This also allows a comparison with other alternatives that would impact surrounding streets. |
| K-65 | <p>3. "... in 2030, when future traffic levels are greater due to growth in the region, one internal intersection (Presidents Way/Centennial Road) would operate at unacceptable levels due to the project rerouting traffic through that intersection. This impact would be potentially significant."</p> | <p>QUESTION: Are the scale and costs of changes acceptable? What about the impacts on Visual Effects/ Neighborhood Character with intensification of traffic on neighboring streets & intersections, and major changes at intersections? At what point do we cease accommodating more & more vehicles vs. providing improved public transportation choices for accessing the park?</p> | K-64 Because the project would not generate additional traffic, increased traffic projections for the year 2030 would occur with or without the project. See also response to comment K-63. |
| K-66 | | <p>COMMENT: The numerous roadway improvements and intersection changes analyzed in addition to those directly attributed to the project would be City of San Diego costs, unrelated to the proposed plan, if #2 in the left column is a correct statement.</p> | K-65 As discussed in Section 4.3.2.1, the bridge's features would be consistent with the bulk and scale of the large concrete abutment of the Cabrillo Bridge. The analysis in Section 4.3.3.1 concludes that impacts associated with neighborhood character/architecture would be significant as it relates to the Centennial Bridge because it would introduce elements of modern architecture. Traffic implications are discussed in Section 4.4.3.1 and determined to be less than significant. |
| | | | Pursuant to CEQA Guidelines Section 15093 the decision maker (City Council) is required to balance, as applicable, the economic, legal, social, technological, or other benefits, of a project against its unavoidable environmental risks when determining whether to approve a project. |
| | | | K-66 The project would not add any traffic to external streets that would require roadway improvements or intersection changes. There are no external/off-site roadway improvements or intersection changes required by the project |

Letter L



THE VOICE OF DOWNTOWN

March 20, 2012

E. Shearer-Nguyen, Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

Dear Ms. Shearer-Nguyen:

L-1

Balboa Park is a significant park resource for the downtown community and the Downtown San Diego Partnership has been following the Plaza de Panama project with great interest since 2010.

We are strongly supportive of the Plaza de Panama project. Of all alternatives studied in the Environmental Impact Report (EIR), it is the only project that successfully balances the restoration of park space and the need to accommodate growing numbers of visitors each year.

No other alternative adds acres of park space, accommodates access from both sides of the park and increases parking. We understand that there is a historical impact, but feel that this impact is balanced by the benefits that San Diegans will see in the park.

We are opposed to any option that proposed to close the Cabrillo Bridge to vehicles. These alternatives will force the thousands of cars each day that access the park from the bridge to find alternate routes. As the EIR shows, this causes unacceptable traffic impacts outside of the park, including on A Street – one of downtown's main circulation arteries.

Balboa Park is an asset to the residents, businesses, and visitors of downtown and we strongly support the Plaza de Panama project.

Sincerely,

Kris Michell
 President and CEO

401 B Street, Suite 100 • San Diego, CA 92101 • Phone (619) 234-0201 • Fax: (619) 234-3444 • www.dtsd.org

L-1 Comment noted.

Letter M

**Greater Golden Hill Planning Committee
Balboa Park Clubhouse
San Diego, California 92102**

March 15, 2012

E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

RE: Plaza de Panama Draft EIR

M-1

This letter is notify you of action taken by the Greater Golden Hill Planning Committee at the March 14, 2012 meeting. We approved the following motion (on a 8 yes, 5 no, 2 abstaining vote):

"To support Alternative 4Biii from the Draft Environmental Report."

Here is the text of Alternative 4Biii:

Modified Precise Plan without Parking Structure Alternative (Alt 4Biii)

The Modified Precise Plan without Parking Structure Alternative would route two-way vehicular traffic along El Prado to the southwest corner of the Plaza de Panama, adjacent to the Mingei International Museum. Valet and passenger drop-offs and tram stop would be provided within the Plaza. Most of the Plaza de Panama and the eastern half of the Mall would be pedestrianized with this alternative. To replace the parking removed from the Plaza de Panama, an equal number of new parking spaces would be created in existing parking lots behind Park institutions and along existing interior streets. The Organ Pavilion parking lot would remain in its existing condition. The ADA parking spaces removed from the Plaza de Panama would be recovered through minor regrading and restriping the Alcazar parking lot (along with the removal of two maintenance sheds at the western edge of the lot); and the creation of additional spaces within the Organ Pavilion parking lot, the areas behind the Museum of Photographic Arts and the Model Railroad Museum, adjacent the southern border of the San Diego Zoo and Old Globe Way. The existing one-way access drives into the Alcazar parking lot would be retained.

At the July 13, 2011 meeting, the Greater Golden Hill Planning Committee approved the following motion (on a 10 yes, 3 no vote):

"To oppose the "bypass bridge" off of the historic Cabrillo Bridge embodied in the current Jacobs plan for Balboa Park"

Please use this information to inform your decision on the project.

Sincerely,

Marie Skillman
Secretary
Greater Golden Hill Planning Committee

cc: Mayor Jerry Sanders
Councilmember Todd Gloria
Councilmember David Alvarez

M-1

Comment noted.



THE LEAGUE OF WOMEN VOTERS OF SAN DIEGO

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 Tel: (858) 483-8696 E-mail: lwvsd@san_rr.com Website: www.lwvsandiego.org

Letter N

March 12, 2012

Elizabeth Shearer-Nguyen, Associate Planner
 Development Services Department/Environmental Analysis Section
 City of San Diego
 1222 First Avenue
 San Diego, CA 92101

Subject: DEIR for the Balboa Park Plaza de Panama Project (#233958)

Dear Ms. Shearer-Nguyen:

N-1 The League of Women Voters of San Diego (LWVSD) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Balboa Park Plaza de Panama Project.

N-2 **LWVSD Objections to the Proposed Plaza de Panama Project:**
 Based on its adopted Balboa Park Positions, the LWVSD cannot support the proposed Project, as described in the DEIR. The significant and unmitigable impacts related to the project's consistency with the City's General Plan (Historic Preservation, Urban Design and Recreation elements), the built environment related to Historic Resources, and the Visual Effects (Neighborhood Character/Architecture), preclude LWVSD support for the Project.

- N-3** Specifically, the LWVSD objects to the Project for the following reasons:
- A** • First, the proposed Centennial Bridge would create significant unmitigable impacts to the Balboa Park National Historic Landmark District. It is in conflict with the Secretary of the Interior's Rehabilitation Standards and the City's Historical Resource Regulations. It is inconsistent with the goals and policies of the Historic Preservation, Urban Design and Recreation Elements of the General Plan.
 - B** • Second, the proposed Organ Pavilion underground parking garage would be in the core of the Central Mesa rather than toward the periphery of the Park thus drawing cars into the Park and perpetuating pedestrian-vehicular conflicts. As the Historic Preservation Technical Appendix of the DEIR points out "the unquestioning accommodation of motorists at the expense of pedestrians, not to mention historic aesthetic values, has taken its toll on the Balboa Park Historic District".

The League of Women Voters is a nonpartisan political organization which encourages the informed and active participation of citizens in government and influences public policy through education and advocacy.

N-1 Comment noted.

N-2 Comment noted.

N-3 A The EIR fully discloses the significant impacts associated with the NHLD and SOI standards, as well as inconsistencies with existing policies within the City's land use plans. A Statement of Overriding Considerations, pursuant to CEQA Guidelines Section 15093, has been prepared for the consideration of the decision-making body (City Council) and left to its discretion to determine whether project benefits would outweigh remaining impacts.

B The project would relieve pedestrian/vehicular conflicts and restore safe pedestrian corridors as originally envisioned at the time of the Park's creation as identified in the Historical Resources Technical Report.

LETTER

RESPONSE

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|-----|--|--|---|---|----------------|
| N-4 | <p>LWVSD Support for Alternative 3-D:</p> | <p>The LWVSD supports Alternative 3-D, the Inspiration Point Parking Structure, and believes that this alternative offers numerous benefits including the following:</p> | N-4 | A | Comment noted. |
| A | <ul style="list-style-type: none"> Alternative 3-D achieves the objective of removing vehicles from the Prado, Plaza de Panama, Plaza de California, the Mall and the existing Organ Pavilion parking lot, thereby alleviating land use compatibility issues associated with pedestrian-vehicular conflicts and achieving an overarching goal of the Balboa Park Master Plan. | B | Comment noted. | | |
| B | <ul style="list-style-type: none"> Alternative 3-D complies with all of the Secretary of the Interior's Standards for historic preservation, unlike the proposed project. | C | Comment noted. | | |
| C | <ul style="list-style-type: none"> Alternative 3-D would be consistent with historic preservation, recreation and urban design policies of the General Plan. | D | Comment noted. | | |
| D | <ul style="list-style-type: none"> Alternative 3-D enables more land to be reclaimed for park space than the proposed Project while providing the same amount of additional garage spaces. | E | Comment noted. | | |
| E | <ul style="list-style-type: none"> Alternative 3-D would meet the major goals of the Balboa Park Master Plan and Central Mesa Precise Plan. These include creating a pedestrian oriented park environment with convenient accessibility, reducing pedestrian-vehicular conflicts, increasing free and open parkland and restoring or improving existing building and landscaped areas while preserving historical significance. | F | <p>The SANDAG 2050 RTP proposes a streetcar route from downtown, looping around the Central Mesa of Balboa Park via Park Boulevard, University Avenue and Sixth/Fifth avenues back downtown. The proposed streetcar route was not included in the TIA because it is speculative at this time to address the specific location of the streetcar stops.</p> | | |
| F | <ul style="list-style-type: none"> Alternative 3-D, through appropriate design, could meet Airport Land Use Compatibility (ALUC) and Airport Environs Overlay Zone (AEOZ) restrictions and address the view corridor and future traffic impacts identified in the DEIR. The traffic impacts would be further mitigated by SANDAG's plans to develop a new street car line that would connect Hillcrest, Balboa Park and Downtown. This project was identified in the recently adopted 2050 Regional Transportation Plan. It was not taken into account by the DEIR. | G | Comment noted. | | |
| G | <ul style="list-style-type: none"> Alternative 3-D could also allow managed vehicle access in the Plaza de Panama for special events just as the proposed Project would. This alternative would also rely on an efficient tram system with frequent service and access to the Alcazar Parking Lot for from President's Way for ADA parking, valet services or drop-off as described in the DEIR. | H | Comment noted. | | |
| H | <ul style="list-style-type: none"> Alternative 3-D achieves all of the Project Objectives with the exception of the second half of Objective #1 which calls for "... maintaining public and proximate vehicular access to the institutions which are <i>'vital to the park's</i> | | | | |

LETTER

RESPONSE

success and longevity, a statement that is unsubstantiated.

N-5 Furthermore, the 2004 Report on Balboa Park Land Use, Circulation and Parking by Jones and Jones Architects reinforces the LWVSD's position. The report states on Page 78:

A "Garages should be located with two goals in mind: reduction of pedestrian conflict, and reclamation of parkland. The simplest way to reduce pedestrian conflict is to capture cars at or near park entries, thereby reducing vehicular traffic in pedestrian areas. While everyone would like to park by the front door of his or her destination, this convenience is simply not possible, and falsely assigns priority to vehicles, instead of to park integrity."

B The Jones and Jones Report goes on to say that the Organ Pavilion parking lot as well as the lot behind the Fleet Center are desirable to reclaim for open space but does not recommend that open space be built on top of parking structures.


The Jones and Jones Report states on Page 80: "Because of the practical constraints of public space built atop structure, the Team feels it is highly preferable that these reclamations be on solid ground rather than (on a structure."

Thank you for the opportunity to comment on this important project.

Sincerely,



Jeanne Brown
Co-President



Mary Jean Word
Co-President

- CC: Mayor Jerry Sanders
Councilmember Sherri Lightner
Council President Pro Tem Kevin Faulconer
Councilmember Todd Gloria
Council President Tony Young
Councilmember Carl De Maio
Councilmember Lorie Zapf
Councilmember Marti Emerald
Councilmember David Alvarez

N-5 A Comment noted.

B Comment noted.

Letter O



BALBOA PARK 1439 EL PRADO
SAN DIEGO CA 92101-1617
(619)239-0003 www.mingei.org

March 7, 2012

E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego CA 92101

RE: Plaza de Panama Project Draft EIR

Dear Ms. Shearer-Nguyen:

O-1

Mingei International Museum is located on the Plaza de Panama in Balboa Park. As such, our Board of Trustees, Staff and members are very interested in any proposed changes in the park as we approach the 2015 Centennial Celebration.

We have reviewed alternatives to the Jacobs' plan studied in the Draft EIR and find significant problems with them. A number of alternatives propose to close the Cabrillo Bridge to vehicles. While this would allow for reclamation of the park's public spaces, it would negatively affect the institutions in Balboa Park. Those on the west would have no proximate public access, and those on the east would be burdened by increased traffic and parking demand.

We also are strongly opposed to alternatives that propose to continue to allow traffic to move through the Plaza de Panama. Our location in the southwest corner of the plaza makes these alternatives particularly troublesome for us. The traffic studies for the project show that there would be unmitigable traffic impacts inside the Plaza de Panama, falling right in front of this museum. We think that this would be a negative condition that would affect visitors trying to access our front door. More important, however, such alternative proposals negate one of the two most important positive effects of the Jacobs' plan.

We fully and strongly support the Jacobs' plan for restoring the Plaza de Panama and think that it does a good job of improving traffic circulation, reducing pedestrian/vehicle conflicts and reclaiming park space while maintaining access from both sides of the park. From the perspective of our institution, removing cars and opening the plaza for full pedestrian use will positively affect this museum by removing traffic from our front door and increasing our visibility. Again, more importantly, it will also greatly benefit the park as a whole and vastly improve the park experience for the millions of people that visit Balboa Park each year.

Sincerely,

Rob Sidner
Director

BOARD OF TRUSTEES

CHAIRMAN JOHN SEIBER • VICE CHAIRMAN & VOLUNTEER COUNCIL LIAISON CAROLYN OWEN-TOWLE SECRETARY CAROL DICKINSON • TREASURER NORMAN BLACHFORD • FOUNDING PRESIDENT & DIRECTOR EMERITA MARTHA W. LONGENECKER

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MINGEI INTERNATIONAL MUSEUM IS ACCREDITED BY THE AMERICAN ASSOCIATION OF MUSEUMS

O-1

Comment noted.

Letter P

From: [Micah Parzen](#)
To: [DSD EAS](#)
Cc: [Sandars, Jerry](#); [Lishner, Councilmember Sherri](#); [Faulkner, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Younis, Anthony](#); [DeMaio, Councilmember Carl](#); [Zaid, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); info@plazadecolonia.org
Subject: Plaza de Panama Project
Date: Monday, March 19, 2012 4:27:27 PM

E. Shearer-Nguyen, Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

VIA E-MAIL: DSEAS@sanidiego.gov

Dear Ms. Shearer-Nguyen:

P-1

As the westernmost institution on Balboa Park's Central Mesa, the San Diego Museum of Man (SDMoM) is arguably the most impacted by the proposed Plaza de Panama project and alternatives considered in the Draft EIR for the project. We are situated on the Plaza de California at the entrance to Balboa Park just east of the Cabrillo Bridge. We also are the institution that is closest to the proposed Centennial Bridge, which would be directly across from our administration building and curve around our collections facilities.

Nearly 7,000 cars pass by our front door each day. Unfortunately, this thoroughfare creates a safety concern for our patrons, including many school children, as well as the many visitors who back up into traffic as they take photographs of the California Tower. If cars were removed from the Plaza de California, it would be one of the most enjoyable pedestrian spaces in all of Balboa Park.

We have carefully studied the Plaza de Panama project and fully support it. While we understand that the Centennial Bridge will have an historical impact, we believe there will be a number of important benefits that will be enjoyed by the millions of people that visit Balboa Park each year. Of particular interest to SDMoM is the restoration of the Plaza de California to its original condition. As the heart of the "California Quadrangle," this plaza is one of the most historically important features of Balboa Park designed by architect Bertram Goodhue. Restoring this plaza to its pedestrian only splendor will give visitors an opportunity that they have not had in decades, namely, the chance to experience the architecture of the California Quadrangle as it was intended. We believe this is a significant benefit, particularly since these buildings are among the few permanent buildings constructed for the 1915 Panama-California Exposition.

We are not in favor of any alternative that proposes to continue traffic through the Plaza de California. This simply perpetuates the problems that we have experienced for years, and which will continue to get worse as traffic to Balboa Park increases. We also are strongly opposed to any alternative that would close the Cabrillo Bridge to vehicle traffic. Such closure would effectively cut off access to SDMoM and leaves us in a cul-de-sac at the west end of Balboa Park. Visitors are our lifeblood, and cutting off an access used by nearly half of Balboa Park's 12 million annual

P-1 Comment noted.

LETTER

RESPONSE

visitors would negatively impact our ability to attract visitors and, thus, seriously threaten our livelihood.

In our view, the Plaza de Panama project does the best job of balancing the needs of Balboa Park, its visitors, and its institutions. We believe that the project will successfully restore Balboa Park's beautiful public spaces for the enjoyment of the public, while still maintaining the public access from both sides of Balboa Park that is so critical to its many institutions, including SDMoM.

Sincerely,

Micah Parzen
CEO, San Diego Museum of Man

Micah D. Parzen, Ph.D., J.D.
Chief Executive Officer
San Diego Museum of Man
1350 El Prado, Balboa Park
San Diego, CA 92101
tel: (619) 239-2001 x 14
fax: (619) 239-2749
email: mparzen@museumofman.org
website: www.museumofman.org

*"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has."--
Margaret Mead*

Letter Q



March 22, 2012

E. Shearer-Nguyen
 Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101
 Via email: DSDEAS@sandiego.gov

Re: Balboa Park Plaza de Panama Project (Project No. 233958/SCH No. 2011031074)

Dear Ms. Shearer-Nguyen

Q-1 Please accept the following comments on the Balboa Park Plaza de Panama Project (Project) Draft Environmental Impact Report (Draft EIR) dated January 23, 2012 on behalf of the National Trust for Historic Preservation. This Project has the potential to result in significant environmental impacts to historic architectural and landscape features of the Plaza de Panama Balboa Park National Historic Landmark District, a remarkably intact historic place important for its connection to both the 1915 Panama-California Exposition and 1935 California Pacific International Exposition. At the time of its original construction, Balboa Park created an architectural movement that spread across the nation and today contains some of the finest Spanish Colonial Revival architecture in the Nation.

Interests of the National Trust

Q-2 The National Trust for Historic Preservation is a non-profit membership organization bringing people together to protect, enhance and enjoy the places that matter to them. Chartered by Congress in 1949, the National Trust for Historic Preservation provides leadership, education, advocacy and resources to a national network of people, organizations and local communities committed to save America's diverse historic places and revitalize communities.

The Significance of Balboa Park

Q-3 As a National Historic Landmark (NHL), Balboa Park has been found to have exceptional value or quality in illustrating or interpreting the heritage of the United States." 36 C.F.R. § 65.4. Further, the site has been found to possess a "high degree" of historic integrity - the ability to convey of its historical associations or attributes. *Id.* This standard is a unique attribute NHLs meaning that Balboa Park has had very minimal alteration from the end of its period of significance to the present. While designation as a Landmark does not create any substantive legal obligations on property owners, National Historic Landmark owners are wise to observe important preservation precepts to steward these sites for the benefit of all Americans.

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 5 Third Street, Suite 707, San Francisco, CA 94103
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Q-1 Comment noted.

Q-2 Comment noted.

Q-3 Comment noted.

LETTER

RESPONSE

Mr. E. Shearer-Nguyen
 March 22, 2012
 Page 2 of 3

- Q-4 Congress requires of federal agencies that steward NHLs, for instance, to minimize harm "to the maximum extent possible." 16 U.S.C. § 470h-2(f).
- Q-5 While we support the project objective to eliminate parking and reduce vehicular impacts from the Plaza de Panama and adjacent promenades, we feel that such a goal can be accomplished without so drastically compromising the historic integrity of the National Historic Landmark District. Specifically, we are concerned about proposed impacts to the Cabrillo Bridge, its setting, the spatial relationships and design elements which define the National Historic Landmark District.
- Q-6 The Cabrillo Bridge was designed as the ceremonial entrance to the 1915 Exposition, and remains the primary entry to the Park. The bridge and its surrounding area, including the California Quadrangle, form a truly remarkable ensemble, containing the most important character-defining elements of the district with a setting nearly unaltered since 1935. Unnecessary alterations to this area should be strictly avoided and feasible alternatives seriously considered.
- Q-7 The proposed project would alter this highly significant site in a way that would compromise its historic integrity. Among the changes are:
- Demolition of 82 feet of the Cabrillo Bridge
 - Encasing and hiding from view major character defining features of the front entrance of the Spanish fortified hilltop town.
 - Construction of an incompatible new bridge element that would be attached to the iconic and historic Cabrillo Bridge.
 - Insertion of new buildings, retaining walls, plant materials, and other landscape features, alteration of historic landforms, and removal of historic landscape and hardscapes elements.
 - Alternation of the Alcazar Garden parking lot by changing the landscape, re-grading the land form and altering the garden's relationship to its setting.
 - Introduction of a new two-lane roadway that bisects the historic core into two spaces.
 - Construction of a new underground parking lot abutting the historic Speckles Organ Pavilion that irreversibly changes the relationship of the organ pavilion to the landscape and severely diminishes its prominent setting.
- Q-8 Under the California Environmental Quality Act, the City has an obligation to adopt feasible alternatives that would avoid these very substantial impacts to such an important historic property.

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- Q-4 Comment noted. Balboa Park is not owned or stewarded by a federal agency.
- Q-5 Comment noted.
- Q-6 Comment noted. The Cabrillo Bridge was designed as the ceremonial entrance for the 1915 exposition. However, as discussed in the TIA and Section 4.4, approximately 55 percent of visitors to the Central Mesa now arrive via Park Boulevard.
- Q-7 See response to comment letter F.
- Q-8 Comment noted.

LETTER

RESPONSE

Mr. E. Shearer-Nguyen
March 22, 2012
Page 3 of 3

Q-9 The Basis for Rejection of Alternative 4biii in the Draft EIR is inadequate

A We are alarmed that the Draft EIR provides very little support for rejecting Alternative 4biii (Modified Precise Plan without Parking Structure), which would accomplish a majority of the project objectives yet cause substantially less damage to Balboa Park. This alternative proposes to two-way vehicular traffic along El Prado to the southwest corner of the Plaza de Panama, and offer a passenger drop-off site adjacent to the Plaza. The Plaza would be pedestrianized, consistent with a fundamental objective of the project, and there would be no net loss in the amount of parking. We believe this alternative is most beneficial because it avoids impacts to historic resources while offering the added benefit of promoting alternate forms of transportation such as bicycling, public transit and walking.

B In rejecting this alternative, the Draft EIR simply states that routing cars in the manner proposed "would have greater traffic impacts" without offering any supporting evidence. (9-224). This basis for rejection without adequate study is clearly insufficient in light of CEQA requirements that a finding that an alternative is infeasible must describe specific reasons for its rejection. Guideline 6 15091(c). *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336. More thorough consideration must be paid to this alternative which we believe is far beneficial from a public policy perspective than the proposed action.

Q-10 In sum, we believe that Balboa Park can, and should, be pedestrianized, but this goal can be accomplished at a far less cost to hits highly unique historic resources than the proposed project. Please do not hesitate to contact me at (415) 947-0692 or brian_turner@nthp.org with any questions or concerns.

Sincerely,



Brian R. Turner
Senior Field Officer/Attorney

cc: M. Wayne Donaldson, State Historic Preservation Officer
Cindy Heitzman, Executive Director, California Preservation Foundation
Bruce D. Coons, Executive Director, Save Our Heritage Organisation
Elaine Jackson Retondo, National Historic Landmarks Program Manager,
National Park Service Pacific West Region

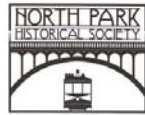
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Q-9 A In accordance with CEQA, the EIR addresses a range of alternatives that would avoid significant impacts of the proposed project. The EIR discloses the impacts of these alternatives in comparison with the project and identifies how each would meet the project objectives. The EIR does not reject any of these alternatives. Based on the information disclosed in the EIR, the decision-making body may choose to approve the proposed project or any of the alternatives, or a combination of alternatives.

B Traffic impacts relative to Alternative 4biii are discussed in detail on page 291 of the TIA, Appendix D-1.

Q-10 Comment noted.

Letter R



North Park Historical Society
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San Diego, CA 92104
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E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

March 12, 2012

**Subject: Comments on Draft EIR for the Balboa Park Plaza de Panama Project
Project No. 233958/SCH No. 2011031074**

Dear City Staff and Decision Makers:

R-1

The North Park Historical Society (NPHS) is a local, all-volunteer 501c3 non-profit organization formed in 2008. Our mission is to preserve North Park's architectural and cultural history through research, education and outreach. Our projects, some of which began in 1988 when we were a committee of the community association, include conducting walking tours, publishing books about North Park's history, and achieving historical designation of districts and landmarks. This letter was approved by vote of the Board of Directors of NPHS on March 12, 2012.

We have conducted a detailed review of the Draft Environmental Impact Report for the Balboa Park Plaza de Panama Project (the "Project") dated January 23, 2012 (the "Draft EIR"). Based on our review, we find that the Draft EIR is not a sufficient informative document for decision makers and the public as required by California Environmental Quality Act (CEQA) Guidelines Section 15151, which states in part, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences...The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." In addition, the City has not conducted its duties as Lead Agency in accordance with the spirit and the letter of environmental law. Our detailed comments on the deficiencies of the Draft EIR and the environmental process follow a brief description of the source of NPHS's standing in this project.

Our standing in the Balboa Park Plaza de Panama Project is based partly on our activities in Morley Field, where significant offsite impacts from the Project would occur. This area is generally referred to as the "Arizona Landfill" in the Draft EIR. Morley Field and the surrounding area constitute the outdoor classroom NPHS uses to teach the importance of historical preservation and the unique story of North Park's historical resources.

R-1

Comment noted.

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-2

Last year we achieved designation of the North Park Dryden Historic District, a six-block neighborhood along 28th Street and Pershing Avenue from Upas to Landis streets at the northeast corner of Balboa Park's East Mesa. We conduct popular walking tours in this residential area, and are planning other walking tours within Morley Field itself and in other residential neighborhoods adjacent to the East Mesa. Our Third Annual Historical Car Show will be held September 8, 2012 in the parking lot adjacent to the Balboa Tennis Club in Morley Field. This event is viewed by NPHS and the Balboa Tennis Club as the first of many cooperative efforts leading to and extending beyond the Balboa Park Centennial in 2015. These and other related activities provide the revenue and community exposure NPHS needs to thrive as an all-volunteer non-profit organization.

Our standing also arises from our desire to protect the historical resources of Morley Field, a recreational area constructed in 1932 as a City unemployment relief program. As discussed in our award-winning community history book, *North Park: A San Diego Urban Village, 1896-1946* by the late Donald Covington, the recreation center had been a plan of John G. Morley (Superintendent of all City parks from 1911 to 1938) since 1914, when he set aside the northeast corner of the park for major outdoor recreation grounds. The *San Diego Union* noted in an article dated October 9, 1932 that "The oft-berated depression has accomplished one new step in carrying to a conclusion the intricate Nolen plan of city development that a decade of prosperous years was unable to bring about—the building of a swimming pool and recreation center at the foot of Texas street in Balboa Park." The swimming pool, baseball diamonds, tennis courts and shuffleboard courts built more than 80 years ago are part of the center. Major municipal events, including picnics, dances, exhibition baseball games and beauty queen competitions occurred at Morley Field and form part of North Park's unique story.

The Central Mesa of Balboa Park is also closely intertwined with North Park's history. The park constrained the construction of transportation facilities, delaying residential development until the early 1900s. Because of the delay, the predominant architectural styles of most North Park neighborhoods are Arts and Crafts, Mission Revival/Spanish Revival and California Bungalow. Mediterranean stucco homes were strongly influenced by the buildings constructed for the 1915 Panama-California International Exposition. The park held views and was an attraction that became compelling selling points for tracts in North Park, including Park Villas and West End, the edges of which are straddled by the North Park Dryden Historic District. Also, one of the few roads that threaded through the early "City Park" was the roadway that became Pershing Drive, and it led directly to the northeast corner of the park at the future intersection of Upas and 28th streets. Therefore, the standing of NPHS in the Project extends to impacts on the Central Mesa.

Through our mission and activities, NPHS has a clear, present, and beneficial right to the City adequately carrying out its duties as Lead Agency and meeting the requirements of CEQA for the Project. We appreciate the opportunity to enter into the administrative record our comments on the Draft EIR for the Balboa Park Plaza de Panama Project.

R-2 Comment noted.

NPHS Letter of Comment on Plaza de Panama Draft EIR

COMMENTS ON SECTION 1: INTRODUCTION

General Compliance with CEQA

R-3 In Section 1.0, the Draft EIR states that the document "has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000, et seq.)" but this is not the case. The Draft EIR should disclose the City Council's approval of the Memorandum of Understanding (MOU) between the City and Plaza de Panama Committee (Committee) on July 19, 2011, and provide a detailed discussion of the effects of this agreement between the City and the project proponent on the environmental process for the Project. The Draft EIR should highlight Article 6.1 of the MOU, which reads as follows:

6.1 Term. This MOU shall become effective upon full execution by the parties and shall expire no later than five years from the date hereof, unless extended for a specific period of time by the City and the Committee. This MOU shall terminate upon any of the following: (1) execution by the parties of a subsequent agreement for development of the Proposed Project; (2) notice by either party to the other of termination of the MOU; (3) City denial of the Proposed Project; and (4) City approval of the Proposed Project in a form unacceptable to Committee (Committee to decide in its sole discretion if City's approval of Proposed Project is unacceptable) or (5) the bonds to be issued by the City will not yield funds adequate to support construction of the Parking Structure.

R-4 The Draft EIR should disclose the findings of the Superior Court of California on January 19, 2012 (Minute Order of Case No. 37-2011-00095579-CU-WM-CTL, Save Our Heritage Organisation [SOHO] vs. City of San Diego, initiated August 2, 2011). Excerpts from the Minute Order are presented below.

"The Court finds the subject MOU constitutes an approval of the proposed project without prior environmental review as required by CEQA. The MOU constitutes action that effectively forecloses due consideration of project alternatives or mitigation measures that are essential parts of CEQA review...Significantly, the MOU also states the MOU shall terminate upon the City's denial of the proposed project, and/or the City approval of the proposed project in a form unacceptable to the Committee (decided in the sole discretion of the Committee) and/or the bonds to be issued by the City will not yield funds adequate to support construction of the parking structure. (MOU, Article 6, Miscellaneous). Although the MOU expressly states that the agreement is not a binding contract and is not enforceable against either party (*Id.*, at 6.4 and 6.5) the fact that the Committee has the ability to unilaterally terminate the project if the proposed project does not go forward as it prefers, the agreement effectively constitutes an approval of the project as proposed by Real Party...[the City's] actions preclude meaningful analysis and consideration of project alternatives and mitigation measures, as well as, deny the public meaningful input and trust in the process."

R-3 The July 19, 2011 Memorandum of Understanding (MOU) between the City and the Plaza de Panama Committee has had no influence on the City's preparation of the EIR, including its role as the Lead Agency and its assessment in the EIR of potential adverse impacts of the project, mitigation for those impacts, and alternatives to the project. The City has complied with CEQA and the CEQA Guidelines in all respects as it has prepared the EIR. Moreover, on March 9, 2012, Judge Hayes signed and entered an Order and Stipulation to Stay Memorandum of Understanding (MOU Stay) in the lawsuit brought by Save Our Heritage Organization (SOHO) against the City and the Plaza de Panama Committee challenging the MOU (Super. Ct. No. 37-2011-95579). In the MOU Stay, the parties stipulated and the Court ordered that the operation and effectiveness of the MOU is stayed pending the City's certification of the Project EIR, or approval of another environmental document appropriate for a revised Project, and the City's approval of Project entitlements. In addition, the MOU Stay states that this stay of the operation and effectiveness of the MOU fully cures the City's precommitment to the project, as alleged by SOHO and ruled by this Court in its Order of January 19, 2012, so that the City's approval of the MOU in July 2011 and the circumstances surrounding that approval can no longer prejudice the City's compliance with CEQA during the EIR review process and during the City's consideration of Project entitlements. This stipulation among the parties and order by the Court conclusively establishes that the MOU has not improperly affected the City's preparation of the EIR.

R-4 See response to comment R-3.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

- R-5 In addition to the Court findings, the Draft EIR should address the specific requirements of the CEQA Guidelines that are violated by the City's approval of the MOU, including the following:
- 15002(a) Basic Purposes of CEQA. The basic purposes of CEQA are to:
(3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
 - 15002 (h) Methods for Protecting the Environment. CEQA requires more than merely preparing environmental documents...when an EIR shows that a project would cause substantial adverse changes in the environment, the governmental agency must respond to the information by one or more of the following methods... (1) changing a proposed project, (2) Imposing conditions on the approval of the project...(4) Choosing an alternative way of meeting the same need; (5) Disapproving the project...
 - 15002 (j) Public Involvement. Under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project.
 - 15003 (b) The EIR serves not only to protect the environment but also to demonstrate to the public that it is being protected.
 - 15021 (a) CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible...(2) A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment.

Conduct of Lead Agency Duties

R-6 In Section 1.2.1, the Draft EIR states that "The City of San Diego is the Lead Agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the public agency that has the principal responsibility and authority for carrying out or approving the project." However, by approval of the MOU, the City delegated its responsibilities as Lead Agency to the Committee, a private entity and project proponent with a singular view of how the project should occur.

- R-7 The Draft EIR should address the specific duties of a Lead Agency required by the CEQA Guidelines that have been violated by the City's approval of the MOU, including the following:
- 15041 (a) A lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment...
 - 15042 Authority to Disapprove Projects: A public agency may disapprove a project if necessary in order to avoid one or more significant effects on the environment that would occur if the project were approved as proposed.

R-5 See response to comment R-3.

R-6 See response to comment R-3.

R-7 See response to comment R-3.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

Scope of EIR

R-8 In Section 1.3.2, the Draft EIR lists the issues determined during the scoping process to have the potential to result in significant environmental impacts. Missing from the list is Recreation, item XV in CEQA Appendix G: Environmental Checklist Form. Checklist question XV(b) is "Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?" In the City's initial project review, the answer to this question should have been yes, potentially significant impacts to recreational facilities could occur. A specific section on impacts to recreation in the Central Mesa and East Mesa should have been included in the Draft EIR, particularly when one of the issues noted in the Summary as an area of controversy was "recreation (impacts to existing park uses)."

R-9 Section 8.2 of the Draft EIR, Effects Found Not to Be Significant-Special Events, is not an adequate analysis of potential impacts on important city recreational facilities during construction and after completion of the proposed project. Missing is an analysis of impacts to special events such as December Nights, Rock N' Roll Marathon, America's Finest City Half Marathon, and Earth Fair during the two years of project construction. Can these events, several of which have been held consecutively for 34 years, be held during construction? This potential impact is not addressed in the Draft EIR.

R-10 Also completely lacking is an analysis of the offsite impacts during construction and after project completion on Morley Field recreational facilities due to disposal of soil excavated for construction of the parking garage. Facilities potentially impacted include the Morley Field archery range, hiking trails, Florida Canyon trail connections, the Frisbee golf course, baseball fields, and play fields; activities potentially impacted include Little League, soccer, San Diego City College baseball games and practice, Velodrome races, and nationally prominent cross country races and tennis tournaments.

R-11 Potential impacts to recreational resources require analysis, disclosure, and mitigation. Correcting this deficiency in the Draft EIR will require the addition of "significant new information" under CEQA Guidelines Section 15088.5(a). Adequate analysis will reveal that (1) new significant environmental impacts would result from the Project at Morley Field and new mitigation measures would be needed, and (2) there will be a substantial increase in the severity of environmental impacts to special events requiring mitigation measures that could be declined to be adopted by the project proponent under the authority of the MOU.

R-12 If the City decides not to recirculate the Draft EIR, under CEQA Guidelines Section 15088.5(e) that decision "must be supported by substantial evidence in the administrative record."

COMMENTS ON SECTION 3: PROJECT DESCRIPTION

Project Objectives

In Section 3.1 of the Draft EIR, the fifth project objective is the following:

R-8 The project does not include recreational facilities, or require the construction of recreational facilities as referenced in the CEQA Appendix G Checklist. There are no recreational facility impacts that are not already included as part of the project. Section 8.6 has been revised to include a discussion of recreational resources.

R-9 The project does not preclude the opportunity for these events to occur during construction as staging of the project is intended to allow the ongoing use and enjoyment of the Park facilities during construction.

R-10 Access to amenities at Morley Field could be temporarily limited during construction. These temporary impacts would be less than significant. The Final EIR has been revised to add Section 8.6, providing a discussion of temporary access issues. See response to comment R-3.

R-11 See response to comments R-8 and R-10.

R-12 Comment noted.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-13 "Implement a funding plan including bonds that provides for construction of a self-sustaining paid parking structure intended to fund the structure's operation and maintenance, the planned tram operations, and the debt service on the structure only."

The Draft EIR lacks a separate and clear analysis of how this objective is being accomplished by the Project. As discussed in the comments in this letter under Parking, understanding the feasibility of accomplishing the objective related to parking structure funding is critical for decision makers and the public. The Draft EIR should add a section dedicated to analyzing the proposed funding plan and how the parking structure will be self-sustaining.

Arizona Street Landfill

R-14 In Section 3.4.6.4, the Draft EIR discusses disposal of 142,000 cubic yards of excess soil generated by excavation for the parking structure. The description of the disposal program is not adequate under CEQA Guidelines Section 15124(c), which requires "A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." The discussion is also not sufficient to satisfy CEQA Guidelines Section 15147, which requires information "sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public."

R-15 The disposal is proposed to occur at the "Arizona Street Landfill," a portion of the East Mesa immediately adjacent to sensitive biological resources in Florida Canyon and important recreational facilities at Morley Field used extensively by children and adults. Yet the project description defers critical aspects of erosion control, construction activities, soil export and placement, and haul route monitoring to the construction contractor, making no attempt to develop or describe these aspects. In addition, there is no description of how the existing active landfill gas collection system, an important public service facility, would be modified for the Project, even though it is later revealed in the Draft EIR that an explosion occurred at the site due to methane gas buildup. The project description merely notes that "the contractor would obtain approvals of the necessary protection and reconfiguration of the existing active landfill gas collection system with the required Health and Safety Plan."

R-16 The Draft EIR should develop complete details on the disposal program so that potential impacts can be adequately addressed and disclosed to the decision makers and the public.

Parking

In Section 3.4.7.3c, the Draft EIR states, "Currently, staff and employees utilize over 550 of the most centrally located parking spaces." Table 3-1 in Section 3.4.7.3 presents a combined total of 557 parking spaces in the Plaza de Panama, Alcazar, and Organ Pavilion parking lots. Is the EIR stating that all but 7 of the 557 spaces available at the parking lots directly affected by the Project are utilized by staff and employees?

R-13 Section 3.1 contains a statement of the project's objectives. Neither CEQA nor the CEQA Guidelines require an analysis of whether and how the project will attain the objectives; such analysis is outside the scope of an EIR. The decision makers (City Council) will assess whether the project would meet its objectives as they consider whether to approve the project, an alternative to the project or no project at all. A financial feasibility study, entitled Parking Structure and Transportation System Financial Projections (January 11, 2012), of the proposed parking structure has been prepared and is included as Appendix D-3.

R-14 Section 3.4.6.4, Figure 3-31 (haul route), and Figure 3-41d (grading plan), provide a full description of this project component. See response to comment R-15.

R-15 Project effects on the Arizona Street Landfill are addressed throughout the EIR. Each issue is adequately addressed and compliant with CEQA Guidelines. Refer to:

- Figure 3-31 and page 3-89 for a discussion and illustration of the proposed haul route;
- Section 4.4.2.1a for the analysis of project-related traffic impacts (see also TIA, Appendix D-1);
- Section 3.5.6 for the project's inclusion of landscaping and storm water control measures;
- Section 4.16.2.1 for construction Best Management Practices required to provide erosion control during all phases of construction;
- Section 4.5, specifically Table 4.5-4, for discussion of construction activities associated with the soil export disposal;
- Section 4.10 for discussion of the gas collection system located within the boundary of the Arizona Street Landfill site; and
- Section 4.10.2.1 for Local Enforcement Agency (LEA) requirements.

R-16 The EIR provides information to assess the foreseeable impacts associated with implementation of the project. The preparation of a project-specific Storm Water Pollution Prevention Plan and Health and Safety Plan as a condition of approval would ensure that the related project impacts would be less than significant.

NPHS Letter of Comment on Plaza de Panama Draft EIR

"Implement a funding plan including bonds that provides for construction of a self-sustaining paid parking structure intended to fund the structure's operation and maintenance, the planned tram operations, and the debt service on the structure only."

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Arizona Street Landfill

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The disposal is proposed to occur at the "Arizona Street Landfill," a portion of the East Mesa immediately adjacent to sensitive biological resources in Florida Canyon and important recreational facilities at Morley Field used extensively by children and adults. Yet the project description defers critical aspects of erosion control, construction activities, soil export and placement, and haul route monitoring to the construction contractor, making no attempt to develop or describe these aspects. In addition, there is no description of how the existing active landfill gas collection system, an important public service facility, would be modified for the Project, even though it is later revealed in the Draft EIR that an explosion occurred at the site due to methane gas buildup. The project description merely notes that "the contractor would obtain approvals of the necessary protection and reconfiguration of the existing active landfill gas collection system with the required Health and Safety Plan."

The Draft EIR should develop complete details on the disposal program so that potential impacts can be adequately addressed and disclosed to the decision makers and the public.

Parking

R-17

In Section 3.4.7.3c, the Draft EIR states, "Currently, staff and employees utilize over 550 of the most centrally located parking spaces." Table 3-1 in Section 3.4.7.3 presents a combined total of 557 parking spaces in the Plaza de Panama, Alcazar, and Organ Pavilion parking lots. Is the EIR stating that all but 7 of the 557 spaces available at the parking lots directly affected by the Project are utilized by staff and employees?

R-17

The EIR considers the centrally located parking lots as the Plaza de Panama, Alcazar Garden, Organ Pavilion, and Pan American parking lots. Pursuant to the current CMPP there are 1,155 parking spaces available within these lots.

Early arriving staff and employees utilize parking spaces that are most convenient to their place of employment. For many of these employees, it is these central lots. However, other employees utilize other lots including Pan American, Federal/Aerospace, and Casa de Balboa parking lots, all of which are located proximate to their particular places of employment.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

- R-18 If the EIR actually is referring to other parking lots that also are "centrally located," the Draft EIR should be modified to explain this important point more clearly.
- R-19 If it is true that most of the parking spaces in the Plaza de Panama lot (33 standard plus 21 ADA) and Alcazar lot (131 standard plus 5 ADA) are taken by staff and employees, it is not clear why these spaces, or at least the 164 standard spaces that would be eliminated by the Project, need to be replaced at all. Visitors are apparently parking farther away under current conditions and the viability of Balboa Park institutions is not noted to be threatened by this situation.
- R-20 Section 3.4.7.3c of the Draft EIR notes that employees could use spaces in the Pan American lot, Federal Building lot, or the Inspiration Point lot. This statement appears to be reasonable. The Office of the Independent Budget Analyst Report dated July 15, 2011 (IBA Report number 11-44) provided in support of the City Council resolution regarding the MOU stated that even "during those times of peak visitation at the park, parking is still available at Inspiration Point and Federal/Aerospace Lots further away, which are underutilized at approximately 50% capacity. The Inspiration Point and Federal/Aerospace Lots offer 1,264, and 509 spaces, respectively." Therefore even at peak times, 632 spaces should be available at the Inspiration Point lot and 254 spaces at the Federal/Aerospace lot for employees displaced by the Project without affecting current parking availability for visitors.
- R-21 The Draft EIR states repeatedly that the Project does not plan to implement an employee parking management plan. But based on the information presented in Section 3.4.7.3, employee parking management would be more effective than the proposed parking structure in enhancing proximate parking for visitors. All that would be needed is an active plan to assure that employees park in the more remote lots instead of the existing Organ Pavilion lot, which has 357 standard spaces and 10 ADA spaces. The "passive" form of employee parking management anticipated to occur by converting free parking to paid parking in a structure is an expensive, impactive, and ineffective way to achieve Project objectives. The objective of maintaining public and proximate vehicular access to the institutions on the Central Mesa while removing vehicles and improving access to the Central Mesa through the provision of additional parking [for visitors] can be achieved without a paid parking structure. The Draft EIR should disclose why an employee parking management plan is not part of the Project.
- R-22 Section 3.4.7.3b of the Draft EIR states that "Paid parking would be implemented for the new parking structure to offset the costs associated with the construction of the underground parking facility. Parking revenue would also be used to support the expanded tram system and the management, operating, and maintenance expenses of the parking garage." The implication that there will be sufficient revenue to accomplish these goals is not supported by information in the Draft EIR. This is particularly important because one of the Project objectives is to "Implement a funding plan including bonds that provides for construction of a self-sustaining paid parking structure intended to fund the structure's operation and maintenance, the planned tram operations, and the debt service on the structure only."
- R-23 Understanding the feasibility of accomplishing the goals and objectives related to the parking structure is critical for decision makers and the public. The Draft EIR should disclose relevant information from IBA Report Number 11-44, including the following points:

- R-18 See response to comment R-17.
- R-19 Comment noted.
- R-20 Comment noted.
- R-21 Implementing an employee parking management plan is not one of the stated project objectives and, therefore, not a component of the project. For the most part, Park employees are not employed by the City, but rather by the Park institutions. There is no requirement for the City to implement an employee parking management plan for employees of other institutions within the Park.
- R-22 Revenue projections have been prepared by the parking consultant and included in a Parking Structure Financial Projections, which has been included in the EIR as Appendix D-3. The study supports that the new structure would be able to offset the costs of bond repayment, maintenance, and operations of the tram system.
- R-23 See response to comment R-22.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

- The parking consultant estimated net annual parking revenue (after all operating, maintenance and tram costs are paid) ranging from \$1.2 million to \$1.4 million for the first ten years.
- Approximately \$14 million of net bond proceeds could be supported by projected revenue from the parking structure.
- If net parking revenue is less than projected, the General Fund would be obligated to cover the difference.
- The parking consultant assumed an average 88% annual occupancy for the proposed parking garage.
- A 10% reduction in the consultant's assumed parking occupancy results in an approximate reduction of \$240,000 in projected parking revenue, which would have to be covered by the General Fund.
- The availability of free parking in other areas of the park poses a challenge for occupancy assumptions for the paid parking garage on typical non-event days at the park. There is uncertainty regarding how the availability of free parking will impact the usage of the paid parking structure.
- Special event days at the park only comprise 3% of the projected revenue, given that they are averaged to occur only 3 times per month.
- Expenses for security patrol at the parking garage were not included in the parking consultant estimate of operational costs, and could total \$175,000 annually.
- The IBA recommends that projected parking revenues and all parking structure costs (including possible costs for a security service) be carefully reevaluated before bonds are sized in order to minimize fiscal exposure for the General Fund.

R-24 In addition, the Draft EIR should disclose a reasonable estimate of construction costs for the parking structure. Otherwise, the decision makers and the public cannot evaluate the feasibility of constructing a self-sustaining paid parking structure. Parking structures can be an extremely expensive way to provide parking spaces. A typically cited parking structure cost is \$20,000 per space, with the caveat that underground parking structures can be twice to three times typical values. At \$20,000 per space, the proposed structure would cost nearly \$16 million. A 2008 presentation on parking structure costs at UCSD listed the cost of the 800-space University Center Parking Structure at \$27.1 million, or \$33,875 per space. At that price per space, the parking structure for the Project would cost more than \$27 million. Estimating the cost of the parking structure would involve some forecasting, but CEQA Guidelines Section 15144 states that "While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can."

R-24 The construction cost estimate for the Plaza de Panama parking structure has been determined to be \$15 million. This cost estimate has been based on the details of the proposed design, as well as, the site specific conditions which have been determined through the design process.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-25 Furthermore, the Plaza de Panama Fact Sheet states that "The parking structure will be funded by a \$14 million dollar self-supporting revenue bond." If this is a valid statement, a cost estimate for the parking structure must exist, or how else can it be known that the revenue bond would be self-supporting? The Draft EIR should disclose this information to decision makers and the public.

R-26 If in fact the parking structure cannot be built for \$14 million, and/or an average 88% annual occupancy in the parking structure cannot be achieved, the parking structure will not be self-sustaining with the assumed rate structure. Since the Draft EIR includes the statement that paid parking would offset the costs of underground parking construction, the document should thoroughly discuss this aspect.

R-27 Although CEQA Guidelines Section 15131 allows economic or social information to be included in an EIR or presented in whatever form the agency desires, this economic information is extremely important given the substantial physical changes to the Central Mesa and East Mesa that will result from the parking structure. Now is the time to fully disclose how feasible it is for the parking structure to accomplish the goals and objectives stated in the Draft EIR.

COMMENTS ON SECTION 4: ENVIRONMENTAL ANALYSIS

R-28 In several sections of the Draft EIR, significant environmental effects of the Project have not been assessed in accordance with CEQA Guidelines Section 15126.2 (a), which states in part that "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects." CEQA Guidelines Section 15151 is also not satisfied because the EIR has not been "prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Sections of the Draft EIR that need additional, more complete, or more accurate analysis are discussed below.

Land Use

R-29 Section 4.1.3.1e of the Draft EIR notes that "The placement of fill and grading operations within the Arizona Street Landfill disposal site has the potential to result in significant indirect impacts to the MHPA associated with noise, lighting, drainage, and the introduction of invasive plants." Section 4.1.3.3 of the Draft EIR provides Mitigation Measure LU-1-A8 for noise impacts, as follows:

"Noise - Due to the site's location adjacent to or within the MHPA, construction noise that exceeds the maximum levels allowed shall be avoided, during the breeding seasons for protected avian species such as: California Gnatcatcher (3/1-8/15); Least Bell's vireo (3/15-9/15); and Southwestern Willow Flycatcher (5/1-8/30). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. When applicable, adequate noise reduction measures shall be incorporated."

R-25 Comment noted.

R-26 Comment noted. See response to comment R-22.

R-27 Comment noted. See response to comment R-22.

R-28 Comment noted. See individual responses, below.

R-29 Potential edge effect and indirect impacts to coastal California gnatcatcher breeding habitat within the off-site MHPA area in Florida Canyon are addressed in Sections 4.6 and 4.1. While the general coastal California gnatcatcher mitigation is identified in LU-1, staff inadvertently omitted the specific mitigation language for coastal California gnatcatcher. This language has been added to measure LU-1 in the Final EIR.

NPHS Letter of Comment on Plaza de Panama Draft EIR

The Draft EIR concludes that "Implementation of mitigation measure LU-1 for MHPA Adjacency would reduce impacts to less than significant." However, this statement is not substantiated by the analysis in the Draft EIR. California gnatcatcher were noted as present in the Florida Canyon MHPA next to the proposed offsite disposal site. Mitigation Measure LU-1 is too vague. It is impossible to evaluate if construction noise levels could feasibly be reduced to protect breeding birds. The feasibility of temporary noise walls or other methods should have been evaluated. If construction noise cannot be reduced to regulatory levels allowed during the California gnatcatcher breeding season, the Draft EIR should specifically prohibit construction activities near the MHPA during the period from March 1 to August 15.

Traffic Circulation and Parking

R-30 Section 4.4.1.4 of the Draft EIR describes existing parking resources and patterns. The term "prime" parking space is used but not specifically defined. The Draft EIR should clarify which spaces or lots are being classified as "prime."

R-31 The Draft EIR states that "Considering the total amount of employees parking at the Central Mesa is about 500, employees displace up to 4,000 visitors per day from prime parking spaces." If this is the case, would any additional parking actually be needed if the employee parking issue were solved? Does any of the parking being eliminated in the Plaza de Panama and Alcazar lots actually need to be replaced?

R-32 Parking patterns are also relevant to evaluating the achievable parking occupancy at the proposed parking structure. Table 4.4-4 in the Draft EIR presents existing parking conditions in terms of spaces occupied and percentage utilization. Under existing weekday conditions, 50 spaces are occupied at the Plaza de Panama lot, 136 are occupied at the Alcazar lot, and 348 are occupied at the Organ Pavilion lot. Assuming all of these parkers would use the parking structure of 798 spaces, the occupancy of the structure would be 67%, far below the 88% assumed by the parking consultant to estimate net annual parking revenue. This simple calculation does not take into account employee parking patterns and the fact that some ADA spaces would still be available at the Alcazar lot. The Draft EIR should provide an analysis of reasonably achievable parking structure occupancy with the values presented in Table 4.4-4. Such analysis is critical to determining if the objective of having a self-sustaining paid parking structure that provides funds for maintenance, the planned tram operations, and the debt service on the structure can be met by this component of the Project.

R-33 A Section 4.4.4.1 of the Draft EIR discusses parking impacts. This discussion references a paid parking structure in San Francisco to justify the contention that the proposed parking structure would have a high utilization and that parking fees would not be a deterrent to maintaining high occupancy levels. Why is the Draft EIR referencing a structure in another city when an example is at University Avenue and 29th Street in the San Diego community of North Park? The response of drivers to this local parking structure that only charges \$5 should be explored and cited in the Draft EIR. Word "on the street" is that the North Park structure is not highly utilized and drivers continue to prefer free parking available in the surrounding commercial and residential area.

R-30 Prime parking spaces for purposes of the EIR generally refer to the centrally located parking lots that include Plaza de Panama, Alcazar, Organ Pavilion, Pan American, Fleet Space Theatre, and the Casa de Balboa lots.

R-31 The project's objectives include removing vehicles from the Plaza de Panama and providing additional convenient visitor parking close to the central core. See response to comment R-21.

R-32 See response to comment R-22.

R-33 A The comparison to Golden Gate Park in San Francisco is made due to its similarities to Balboa Park's regional park status, including a number of major cultural institutions and a very large visitor component. The project's parking structure is also the closest parking supply to these institutions, as is the case in Golden Gate Park. The parking structure located in North Park does not serve the same type of parking demand generators.

B Comment noted.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-34 Section 4.4.4.1 of the Draft EIR does not explore future parking scenarios that could occur with construction of the parking structure. One scenario is that there is too much free parking available in the surrounding area to generate adequate occupancy in the parking structure and create a self-sustaining facility. Is it likely that the City would then make other lots paid also? Since this is a City project, such analysis would not be speculative.

R-35 Section 4.4.4.1 of the Draft EIR does not explore the Zoological Society's likely response to creation of paid parking in the Central Mesa. According to Table 4.4-4, the zoo parking lot is 93% utilized during the week and 100% utilized on the weekend. Would the Zoological Society determine they must protect parking availability at the zoo lot? What changes would occur to parking patterns and affordability of Balboa Park for all citizens of San Diego if the nearly 3,000 spaces at the zoo became paid parking? These questions can be addressed without speculation and should be answered in the Draft EIR.

Biological Resources

R-36 Section 4.6.2.3 of the Draft EIR states that "Implementation of mitigation measure LU-1 would reduce direct and indirect impacts to coastal California gnatcatcher to less than significant." As noted above under the discussion of Land Use, mitigation measure LU-1 is not sufficient. An analysis of the feasibility of temporary noise walls or other methods should be presented or construction activities near the MHPA during California gnatcatcher breeding season should be prohibited.

Geologic Conditions

R-37 Section 4.8.2.1e of the Draft EIR discusses the Arizona Street Landfill and states that "there would be no exposure of people or property to geologic hazards as a result of this off-site project component." However, the portrayal of this area of Morley Field in this section of the Draft EIR is not accurate. The area is not simply an inactive landfill. Every day, children and adults come to this area to run, walk, ride bikes, and enjoy the view. So there are people present that could be exposed to geotechnical risks. The Draft EIR should include an analysis of the potential impacts from additional weight of up to 11 feet of soil being added to the interim cap, and potential risks from disruption of the landfill gas collection system.

Noise

R-38 Section 4.12.6.1a of the Draft EIR analyzes construction equipment noise. This analysis is incomplete. Potential impacts from construction equipment noise due to offsite activities in the Morley Field area are not analyzed. Homes along Upas Street are less than 1,000 feet from the northernmost sites identified for receiving soil. The equipment, timing and duration of soil disposal and grading activities should be discussed, and potential sound levels should be quantified at the nearest residential property line. If construction activities in the Morley Field area are proposed outside of the 7:00 am to 7:00 pm time period, the intention of the City to obtain a permit to allow such activities should be disclosed.

R-34 See response to comment R-22.

R-35 Issues relating to the project's effects on Zoo parking is speculative and beyond the scope of this EIR.

R-36 See response to comment R-29. See also response to comment letter D.

R-37 As discussed in Section 4.8.2.1, the additional weight of soils would not be an impact to the impervious cap, and the gas recovery system would function as it does today. The project would raise the gas monitoring wells in compliance and under the direction of the City's Environmental Services Department (ESD)/LEA and in compliance with state and local regulations. Therefore, people using this area would not be exposed to geotechnical risks.

R-38 Residential uses are located more than 1,000 feet from the main haul route. As discussed in the EIR, truck hauling noise levels at these homes would be less than significant. There is an extended haul route on Jacaranda Place and residences located as close as 275 feet north of this haul route on Upas Street and as close as 250 feet east of this haul route on 28th Street. Not all of the truck trips analyzed in the EIR and noise study would utilize this extended route. A maximum of 167 trucks would use this route in a 12-hour period. This would result in maximum noise levels of 37.3 dB(A) $L_{eq(12)}$ at 275 feet and 38.1 dB(A) $L_{eq(12)}$ at 250 feet. Noise levels at residences located adjacent to this extended haul route would not exceed the construction noise limit of 75 dB(A) $L_{eq(12)}$. Additionally, noise levels would not exceed the nighttime noise ordinance limit of 40 dB(A) L_{eq} . Noise Impacts due to truck hauling would be less than significant.

As described in Section 3.8.2, certain construction activities would occur outside typical working hours and such activities would occur in coordination and with the authorization of City Development Services Department (DSD)/Park and Recreation Department staff approval. In accordance with Municipal Code Section 59.5.0404, the project would obtain a construction noise permit for construction activities between 7:00 p.m. and 7:00 a.m.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-39 Section 4.12.6.1b of the Draft EIR discusses truck hauling noise. This section is incomplete and contains inaccuracies, as discussed below.

The Draft EIR states that the haul route is shown on Figure 3-42. There is no Figure 3-42 in the Draft EIR. The proposed haul route is shown on Figure 3-31.

R-40 The Draft EIR states that "the nearest sensitive uses are located more than 1,000 feet from the haul route." This statement is incorrect. The haul route is immediately adjacent to the Naval Medical Center along Park Boulevard, as well as the Florida Canyon MHPA (which supports the federally listed California gnatcatcher) along Florida Drive and Pershing Drive. The Draft EIR should present an analysis of truck hauling noise on these sensitive uses.

R-41 In addition, the extended haul route is within 200 feet of homes along 28th Street at the intersection of Pershing Drive and Redwood Street, and closer than 1,000 feet to homes along 28th and Upas streets at Jacaranda Place. The Draft EIR should present an analysis of noise impacts along the extended haul route.

Public Services and Facilities

R-42 Section 4.14.2.1c of the Draft EIR evaluates impacts to public facilities/road maintenance. The Draft EIR states that "The cost of maintaining the parking structure would be recovered through revenues generated by paid parking within the facility." However, this statement has not been substantiated by analysis in the Draft EIR.

R-43 The Draft EIR also states that "Furthermore, public facilities and roadway maintenance are a financial matter that would not result in physical effects on the environment." This statement is inaccurate and should be deleted. When public facilities and roadways are not maintained, physical impacts on the environment do occur. For example, water quality can be impaired by poorly maintained roadways, flooding can occur from poorly maintained storm drains, and degraded air quality can result from traffic congestion.

R-44 In Section 4.14.2.1c of the Draft EIR there is no discussion of impacts from construction damage to local roadways, including truck hauling along the route between the Central Mesa and East Mesa. Most of the roadways depicted in Figure 3-31 (Proposed Haul Route to Arizona Landfill) have been repaved recently, including Zoo Place, Florida Drive, and Pershing Drive. The significant impact of ruining these roadway improvements should be acknowledged in the Draft EIR, and specific mitigation to repair all roads impacted by construction should be mandated as part of the Project.

COMMENTS ON SECTION 9: PROJECT ALTERNATIVES

No New Parking Structure Alternative

Section 9.3.3A of the Draft EIR inaccurately analyzes the No New Parking Structure Alternative.

R-39 Section 4.12 has been revised to reference Figure 3-31 as showing the truck haul route.

R-40 Figure 3-31 shows the proposed truck haul route and Figure 4.6-1b identifies the location of the adjacent MHPA lands. Additionally, Section 4.12.6.1b identifies the Naval Medical Hospital as a land use adjacent to the truck haul route.

In response to the comment, Section 4.12.6.1b has been clarified to provide consistency between the description of the adjacent Naval Medical Hospital use and the analysis. Specifically, a Naval Medical Center construction hauling noise impact analysis was added. This analysis determined construction hauling noise would not exceed the construction noise limit or exceed the nighttime noise ordinance limit, and therefore would be less than significant. Refer to Section 4.12.6.1b for additional information.

Indirect construction noise impacts to the MHPA are addressed in EIR Sections 4.1.3 and 4.6.6. As detailed in those sections, construction noise impacts to the MHPA are potentially significant. Mitigation measure LU-1 would be implemented to reduce potential MHPA impacts to below a level of significance.

R-41 In response to this comment, Section 4.12.6.1b has been clarified to state that there are residential uses located as close as 275 feet north of this haul route on Upas Street and as close as 250 feet east of this haul route on 28th Street. Based on a worst-case scenario, using typical noise levels associated with truck pass-bys of 90 dB(A), noise levels at residences and receptors located adjacent to the truck haul route would not exceed allowable construction noise limits and would therefore be considered less than significant.

R-42 See response to comment R-22.

R-43 See response to comment R-22 with respect to the proposed parking structure. With regards to other proposed improvements, any new construction would be required to comply with current standards and regulations including, but not limited to, implementation of storm water BMPs, air quality emission levels, and traffic.

R-44 As a standard condition of project approval, the project would be required to repair any haul routes roads physically damaged as a result of the project.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-45 A conclusion of Issue d-1: Traffic Capacity is inaccurate. The Draft EIR states that in 2030, the Park Boulevard/Space Theatre Way intersection would have significant, unmitigable impacts. This intersection is stop sign controlled, and the movement that operates poorly is the left turn from the Central Mesa to Park Boulevard. This situation occurs in the No Project condition as well as with the Project and alternatives. The poor operation could be corrected with a signal at this intersection. Therefore, the impact is not unmitigable.

R-46 The conclusions of Issue l-5: Temporary Construction Noise, are inaccurate. Temporary construction noise from this alternative would be less than from the Project, not similar. There would be no noise from construction of the parking structure. In addition, there would be no potential impacts from construction equipment noise and truck hauling noise due to offsite activities in the Morley Field area, because no soil would have to be excavated and hauled to the East Mesa. Therefore, the No New Parking Structure Alternative would have less temporary construction noise impacts than the Project. Table 9-1 should be corrected.

R-47 The conclusions of Issue n-1: Public Facilities/Road Maintenance, are incomplete. The No New Parking Structure Alternative would generate fewer new maintenance obligations for the City because a parking structure would not be built. In addition, recently repaved roadways along the proposed haul route would not be impacted by construction because no soil would have to be excavated and hauled to the East Mesa. Therefore, the No New Parking Structure Alternative would have less public services and facilities impacts than the Project. Table 9-1 should be corrected.

R-48 The conclusions regarding this alternative in Section 9.3.3A.3 state the following:

"While the No New Parking Structure Alternative would attain some of the project objectives (1 and 2) by removing vehicles from El Prado, the Plaza de California, the Plaza de Panama, and the Mall; repaving and replanting these areas in accordance with restored pedestrian use; and resolving some traffic hazards, it would not provide additional parking (Objective 3), improve tram service between the Prado and Palisades (Objective 4) or include a funding plan for improvements (Objective 5). This alternative also would provide fewer benefits than the project through resolving fewer pedestrian/vehicular conflicts; providing less restored free and open parkland; and providing no additional parking in proximity to the Park's institutions."

These conclusions should be revised to incorporate the following points:

- In the discussion of Issue d3: Parking, for this alternative, the Draft EIR states that the loss of 158 parking spaces from the Park total would not be a significant impact. Therefore, the failure of the No New Parking Structure Alternative to satisfy Objective 3 is not significant.
- Objective 4 is misstated in Section 9.3.3A.3. Objective 4 actually states, "Improve the pedestrian link between the Central Mesa's two cultural cores: El Prado and the Palisades." The No New Parking Structure Alternative would partially accomplish

R-49

R-45 With implementation of the project, the external streets would operate similar to the No Project conditions, thus there would be no significant impacts to the intersection of Park Boulevard/Space Theatre Way in year 2015 and 2030 conditions. Under the No New Parking Structure Alternative, prohibiting left-turn movements out of Space Theatre Way could mitigate the significant impact at Park Boulevard/Space Theatre Way in 2030.

R-46 Significant and unmitigated temporary construction noise impacts associated with interior noise levels, for the project, and most of the other alternatives are related to construction activities that would occur within the Plaza de Panama. Construction activities would occur in proximity to noise-sensitive uses around the Plaza including museums and theaters. Since this alternative would include similar restoration as the project, both the project and this alternative would result in significant and unmitigated temporary construction interior noise impacts.

R-47 As stated in Table 9-1, project impacts associated with public facilities would be similar to those under this alternative. Although this alternative would preclude the construction of a parking structure, the project would not incur maintenance obligations. See response to comments R-22 and R-44.

R-48 The conclusions stated in Section 9.3.3A.3 relating to the No New Parking Structure Alternative correctly states that this alternative would not provide the additional parking sought by Project Objective 3. This is primarily due to the fact that the project offers a greater number of parking spaces under its implementation.

It is correct that an overall loss of 158 parking spaces was determined to be less than significant in the parking analysis of the alternative. However, unlike impacts, a conclusion relating to an alternative's ability to meet project objectives is not measured in significance. No revision is required as a result of this comment.

R-49 This comment correctly states the text of Objective 4, as provided throughout the EIR.

The conclusions for the No New Parking Structure Alternative, Section 9.3.3A.3, along with Table 9-2, have been revised to reflect the fact that this alternative partially meets Objective 4 of the project.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

Objective 4 by creating a vehicle-free corridor along El Prado West, across the Cabrillo Bridge, and through the Plaza de California, Plaza de Panama and the Mall to the Organ Pavilion. Furthermore, there is nothing about the alternative that would prevent more frequent tram service between the Alcazar parking lot and Palisades area along Pan American Road East, which is highlighted as having two-way vehicle access on Figure 9-3b, Table 9-2, which states "No" for Objective 4 for the No New Parking Structure Alternative, should be corrected to state "Partially."

R-50

- The funding plan for improvements (Objective 5) is specifically linked to bonds for construction, operation and maintenance of a self-sustaining paid parking structure. The fact that the No New Parking Structure Alternative would not satisfy Objective 5 is irrelevant because such funds would not be required. Table 9-2, which states "No" for Objective 5 for the No New Parking Structure Alternative, should be corrected to state "Not Applicable."

Environmentally Superior Alternative

R-51 Section 9.4 of the Draft EIR discusses the Environmentally Superior Alternative. The selection of the Half-Plaza Alternative as the environmentally superior alternative is not supported by the alternative impacts summary in Table 9-1 of the Draft EIR. The inaccurate discussion should be revised in accordance with the comments below.

R-52 Section 9.4 of the Draft EIR should state clearly if either of the No Project alternatives are considered environmentally superior. These would be the No Development/Existing Conditions Alternative and the Central Mesa Precise Plan Alternative.

R-53 If one of the No Project alternatives is environmentally superior, then the Draft EIR should identify the environmentally superior alternative among the "build" alternatives in accordance with CEQA Guidelines Section 15126.6(e)(2). The evaluation should focus on which alternative best reduces environmental impacts caused by the Project (particularly the impacts that are significant and unmitigable).

R-54 The Phased Alternative is the same as the Project, so should be excluded from being considered as the environmentally superior alternative.

R-55 The Draft EIR could apply a simple, quantified screening analysis using the comparison of impacts in Table 9-1 to develop a more objective evaluation than presented in Section 9.4. Comparing impacts of the ten "build" alternatives (excluding the Phased Alternative) in Table 9-1 results in the following conclusions:

- Four alternatives have less impacts than the Project for 13 to 14 environmental issues: No New Parking Structure, Inspiration Point Parking Structure, Stop Light (One-Way), and Modified Precise Plan without Parking Structure. These alternatives perform the best at reducing Project impacts.

R-50 Objective 5 identifies a vehicle for funding as a means to ensure the City is not burdened by the operation and maintenance of a proposed parking garage and tram system. This alternative, while eliminating the parking structure, would include a tram service. The No New Parking Structure Alternative would not have the means to fund the tram service and, therefore, would fail to fully meet Objective 5.

R-51 Comment noted.

R-52 CEQA Guidelines Section 15126.6(e)(2) states, if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The EIR identified the Half-Plaza Alternative as the environmentally superior alternative.

R-53 Comment noted.

R-54 The Phased Alternative provides a different approach to implementation of the project and is therefore considered part of a reasonable range of alternatives. While ultimate build out of the alternative may result in similar impacts as the project, it should not be excluded from consideration as the environmentally superior alternative. It is, however, not identified as the environmentally superior alternative.

R-55 As required under CEQA Guidelines Section 15126.6(e)(2) the EIR identifies an environmentally superior alternative. Section 9.4 provides a reasoned assessment of the alternative impact analysis discussed throughout Section 9.3, and as additionally summarized in Table 9-1. The conclusion reached—that the Half-Plaza Alternative would be the environmentally superior alternative—is supported by the alternative's avoidance of historic, land use, and visual resources impacts associated with the project's construction of the Centennial Bridge, as well as a reduction in the number of impacts to roadways and intersections in year 2030.

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

- R-56 • Three alternatives have less impacts than the Project for 4 to 7 environmental issues: Organ Pavilion Parking Structure, West Mesa Parking Structure, and Half-Plaza. These alternatives perform moderately at reducing Project impacts.
- R-57 • Three alternatives have less impacts than the Project for 0 to 2 environmental issues: Gold Gulch Parking Structure, No Paid Parking, and Tunnel. These alternatives perform poorly at reducing Project impacts.
- R-58 • Three alternatives have greater impacts than the Project for 6 to 7 environmental issues: West Mesa Parking Structure, Gold Gulch Parking Structure, and Tunnel. These alternatives also reduce Project impacts moderately or poorly (for 6, 2, and 1 issues, respectively). They can be eliminated from consideration as the environmentally superior alternative because other alternatives reduce more and increase fewer Project impacts.
- R-59 • One alternative has greater impacts than the Project for only 1 environmental issue: No Paid Parking. However, this alternative does not reduce any Project impacts. Therefore it can be eliminated from consideration as the environmentally superior alternative.
- R-60 • Six alternatives have greater impacts than the Project for 3 to 4 environmental issues: No New Parking Structure, Organ Pavilion Parking Structure, Inspiration Point Parking Structure, Stop Light (One Way), Modified Precise Plan without Parking Structure, and Half-Plaza. A comparison of how well these alternatives reduce Project impacts is presented in Table 1.
- R-61 • The compilation in Table 1 indicates that the Half-Plaza Alternative cannot be fairly characterized as the environmentally superior alternative. The Half-Plaza Alternative only reduces 4 Project impacts, compared to 7 for the Organ Pavilion Alternative and 13 or 14 for the other alternatives. Also, the Half-Plaza Alternative only reduces one significant and unmitigable Project impact (neighborhood character). The other alternatives reduce three significant and unmitigable Project impacts, including impacts to historical resources of the Balboa Park National Historic Landmark District.
- R-62 • The compilation in Table 1 indicates that the Organ Pavilion Parking Structure Alternative also does not qualify as environmentally superior because it only reduces seven Project impacts while the remaining alternatives being considered reduce roughly twice the number of Project impacts, including issues of landform alteration, onsite noise, and paleontological resources.
- R-63 • The compilation in Table 1 verifies that the No New Parking Structure, Inspiration Point Parking Structure, Stop Light (One-Way), and Modified Precise Plan without Parking Structure alternatives perform the best at reducing Project impacts. These alternatives should be the candidates for the environmentally superior alternative and discussed in more detail in Section 9.4 of the Draft EIR.

- R-56 See response to comment R-55.
- R-57 See response to comment R-55.
- R-58 See response to comment R-55.
- R-59 See response to comment R-55.
- R-60 See response to comment R-55.
- R-61 See response to comment R-55.
- R-62 See response to comment R-55.
- R-63 See response to comment R-55.

NPHS Letter of Comment on Plaza de Panama Draft EIR

**Table 1
Comparison of Potential Environmentally Superior Alternatives**

| | No New Parking Structure | Organ Pavilion Parking Structure | Inspiration Point Parking Structure | Stop Light (One-Way) | Modified Precise Plan w/o Parking Structure | Half-Plaza |
|--|---|--|---|--|---|--|
| Project Impacts Reduced by Alternative | -Regulatory Conformance* -Historic Resources* -Archaeo Resources -Public Views -Neighborhood Character* -Landform alteration -Development Features -Particulates -Sensitive Species -MSCP -GHG Emissions -Onsite Noise -Paleontological Resources | -Regulatory Conformance* -Historic Resources* -Public Views -Neighborhood Character* -Particulates -Sensitive Species -GHG Emissions | -Regulatory Conformance* -Historic Resources* -Archaeo Resources -Neighborhood Character* -Landform alteration -Development Features -Particulates -Sensitive Species -MSCP -Runoff & Drainage -Noise/Land use Compatibility -Onsite Noise -Paleontological Resources | -Regulatory Conformance* -Plan Consistency -Historic Resources* -Archaeo Resources -Public Views -Neighborhood Character* -Landform Alteration -Development Features -Particulates -Sensitive Species -MSCP -GHG Emissions -Onsite Noise -Paleontological Resources | -Regulatory Conformance* -Historic Resources* -Archaeo Resources -Public Views -Neighborhood Character* -Landform alteration -Development Features -Particulates -Sensitive Species -MSCP -GHG Emissions -Onsite Noise -Paleontological Resources | -Neighborhood Character* -Sensitive Receptors (air quality) -Sensitive Species -GHG Emissions |
| Project Impacts Increased by Alternative | -Traffic Capacity -Circulation and Access -Parking -Traffic Hazards | -Traffic Capacity -Circulation and Access -Parking -Traffic Hazards | -ALUCP conflict -Public Views -Traffic Capacity -Traffic Hazards | -Traffic Capacity -Circulation and Access -Parking -Traffic Hazards | -Traffic Capacity -Circulation and Access -Parking -Traffic Hazards | -Traffic Capacity -Circulation and Access -Traffic Hazards |

*Impact of Project is significant and unmitigable

LETTER

RESPONSE

NPHS Letter of Comment on Plaza de Panama Draft EIR

R-64 The revised discussion in Section 9.4 of the Draft EIR should note that Project impacts that are increased by the four candidate alternatives mostly relate to transportation/circulation and parking. (The Inspiration Point Parking Structure Alternative also has potential airport plan and public view issues.) The discussion in Section 9.4 of the Draft EIR should be clarified to include the following points:

R-65 • Traffic capacity impacts are identified as significant and unmitigated for all four candidate alternatives, compared to significant and mitigated for the Project. These impacts relate to roadway segments and intersections, which should be discussed separately in the Draft EIR to more clearly distinguish the Project and alternatives. The following points should be included in the comparison of traffic capacity impacts:

R-66 • Of the nine roadway segments that are projected to operate poorly (meaning at level of service (LOS) E or F) in 2030 without the Project, seven segments also would operate poorly with the Project, one segment would be eliminated by the Project (the Mall south of El Prado), and one would be improved by becoming a different segment of the Project (President's Way east of Pan American Road). A new road segment created by the Project, Centennial Bridge south of El Prado, is projected to operate at LOS F in 2030. The Modified Precise Plan without Parking Structure alternative is projected to worsen street segment operations at only one location in 2030, the Mall south of El Prado within the park. The other three candidate alternatives are projected to worsen street segment operation significantly at four locations outside of the park in 2030 due to traffic rerouting; two segments for each alternative also are projected to operate poorly with the Project and two are not.

R-67 • The five intersections that would operate poorly in 2030 without the Project also would operate poorly with the Project. One intersection, Park Boulevard/Space Theatre Way, could have improved operations with installation of a traffic signal, which would mitigate impacts from the No New Parking Structure and Inspiration Point Parking Structure alternatives that affect this intersection. (This impact is incorrectly identified as unmitigable in the Draft EIR.) The No New Parking Structure Alternative would not have any other intersection impacts in 2030 identified as significant and unmitigable. The Inspiration Point Parking Structure Alternative would have one additional intersection impact identified as significant and unmitigable in 2030, the Stop Light (One Way) Alternative would have none, and the Modified Precise Plan without Parking Structure Alternative would have one.

R-68 • Circulation and access impacts are less than significant for three of the candidate alternatives and the Project, but significant and unmitigated for the Modified Precise Plan without Parking Structure Alternative, which would have queuing at the intersection of El Prado and Plaza de Panama from maintaining two-way traffic through the Central Mesa.

R-69 • Parking impacts are identified as potentially significant for the No New Parking Structure and Inspiration Point Parking Structure alternatives due to a possible need for additional

R-64 See response to comment R-55.

R-65 Comment noted.

R-66 Although the Centennial Bridge would be a new segment of roadway created by the project, the amount of vehicles traveling southeast on the bridge would be the same amount as would have continued to travel eastbound under No Project conditions. From the stated candidate alternatives in year 2030, the No New Parking Structure Alternative is projected to have greater traffic impacts at six total locations, two of which can be mitigated. The Inspiration Point Alternative would have significant impacts at five total locations, of which one can be mitigated. The Traffic Signal One-Way Alternative would have significant impacts at eight total locations, of which three can be mitigated. The Modified Precise Plan without Parking Structure Alternative would have significant impacts at one location that cannot be mitigated

R-67 In year 2030, the No New Parking Structure alternative is projected to have significant impacts at five total intersection locations, of which four can be mitigated. The Inspiration Point alternative is also projected to have significant impacts at five intersection locations, of which three can be mitigated. The Traffic Signal One-Way alternative would have significant impacts at three intersection locations that can all be mitigated. The Modified Precise Plan without Parking Structure Alternative would have significant impacts at one intersection location that cannot be mitigated.

R-68 Circulation and access would be impacted for the No New Parking Structure and the Inspiration Point Alternatives as they would close the Cabrillo Bridge to vehicular access thus impacting the surrounding streets and freeways by rerouting traffic access into the Park.

R-69 Comment noted.

NPHS Letter of Comment on Plaza de Panama Draft EIR

West Mesa parking offsite to compensate for closing vehicular access on Cabrillo Bridge. Onsite parking impacts within the Central Mesa are less than significant for these two alternatives. Onsite and offsite parking impacts are less than significant for the Stop Light (One-Way) and Modified Precise Plan without Parking Structure alternatives and the Project.

R-70

- Traffic hazards impacts are less than significant for all four candidate alternatives and the Project. Among the four candidate alternatives, the No New Parking Structure and Inspiration Point Parking Structure alternatives remove the most vehicle-pedestrian conflict locations (9 and 11, respectively), compared to only one conflict location removed for each of the other two candidate alternatives. The Project removes 14 vehicle-pedestrian conflict locations.

Selection of an Alternative

R-71

An accurate and objective comparison of the Project and alternatives is critical because the City has a duty to avoid or minimize environmental damage where feasible in accordance with CEQA Guidelines Section 15021, which notes in part: "(1) In regulating public or private activities, agencies are required to give major consideration to preventing environmental damage. (2) A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment."

R-72

The above analysis demonstrates that there are multiple alternatives that would prevent environmental damage caused by the Project. The four candidate environmentally superior alternatives would reduce the most Project impacts. These four alternatives are economically, legally, socially, and technologically feasible. Therefore, the City should focus their choices for implementing changes in the Central Mesa of Balboa Park on these alternatives, all of which reduce three significant and unmitigable Project impacts, including impacts to irreplaceable historical resources in Balboa Park. It is unimaginable that any perceived benefits of the proposed Centennial Bridge and Central Mesa underground parking structure components of the Project could outweigh their unavoidable environmental damage to the Balboa Park National Historic Landmark District, which is HRB Site #1 and the City's crown jewel of parks.

R-73

The North Park Historical Society is hopeful that these detailed comments on the Draft EIR will help improve the environmental document and assist City Council in making a "decision which intelligently takes account of environmental consequences," in accordance with the spirit and the letter of California environmental law.

Sincerely,



Stephen Hon, President
North Park Historical Society

R-70 Comment noted.

R-71 Comment noted.

R-72 Per CEQA Guideline Section 15126.6 a reasonable range of alternatives to the project shall be included in the EIR. These are presented throughout Section 9.3 with a brief description of the rationale for why these alternatives were selected for their inclusion in the EIR. The EIR provides a meaningful evaluation of each alternative, including a comparison with the project. Table 9-1 provides a matrix which may be used to summarize the comparison. As required under CEQA Guidelines Section 15126.6(e)(2), a single environmentally superior alternative was selected, the Half-Plaza Alternative. As discussed in the EIR, this alternative is selected as such because it would avoid some significant and unmitigable impacts and reduce the extent of other significant impacts, while attaining most project objectives.

A Statement of Overriding Considerations, pursuant to CEQA Guidelines Section 15093, has been prepared for the consideration of the decision makers (City Council) to balance the benefits of the project with the remaining impacts.

R-73 Comment noted.

Letter S



NORTH PARK PLANNING COMMITTEE

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E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Comments on Draft EIR for the Balboa Park Plaza de Panama Project
Project No. 233958/SCH No. 211031074

March 22, 2012

Dear, Ms. Shearer-Nguyen

Attached please find individual comments from members of the North Park Planning Committee on the Draft Environmental Impact Report for the Balboa Park Plaza de Panama Project.

Sincerely,

René Vidales, Vice Chair
North Park Planning Committee

LETTER

RESPONSE

Comments from Members of the North Park Planning Committee on the Balboa Park Plaza de Panama, Circulation & Parking Structure Project DEIR

- S-1 1. Executive Summary, Table S-1, Summary of Significant Environmental Analysis Results, Page Number S-43, Truck Hauling Noise impact: Impacts from Truck Hauling Noise are not less than significant because they were not analyzed adjacent to the Speckles Pavilion, which is a venue for live events, some of which occur during the week. The project proposes approximately 163,000 cubic yards of cut and 21,000 cubic yards of fill, with approximately 142,000 cubic yards of export material, as stated in Page 4.3-46. At 10 cubic yards per hauling truck, this would result in 14,200 truck trips during the construction of the Parking Structure. Although the noise levels were analyzed at residences adjacent to the haul route, the noise levels from hauling trucks adjacent to Speckles Pavilion need to be analyzed in accordance with the **Noise Element of the General Plan** and incorporated into the Noise Study in order to determine the impacts on the Speckles Pavilion during live events.
- S-2 2. Executive Summary, Table S-2, Comparison of Project and Alternatives Impacts Summary, the following impact was not disclosed: The implementation of paid parking in a public park is in direct conflict with the **Recreation Element of the General Plan**, Policy RE-ID.1 "Provide new and upgraded park and recreation facilities that employ barrier-free design principles that make them accessible to San Diegans regardless of age or physical ability, giving priority to economically disadvantaged communities". The implementation of paid parking is also in direct conflict with the **Balboa Park Central Mesa Precise Plan** (CMPP), Land Use, Recommendations, Page 172, "Discourage park uses and policies that restrict free public use of the Park, while allowing consideration of paid parking to cover parking structure construction and maintenance, and operation of the parking structure and tram system from the Palisades to the Plaza de Panama" (Amendment shown underlined). The CMPP proposed amendment's recommendations are contradictory because they implement paid parking while discouraging park uses and policies that restrict free public use of the park. The implementation of paid parking on a public park puts a burden on the disadvantaged and lowers their standard of living, and is in direct conflict with the **Economic Prosperity Element of the General Plan**, which states its purpose is "To increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy". When paid parking is added in one location, it will have the domino effect of paid parking in the rest of the park. The public has not been adequately made aware of this effect. NPPC knows from our experience, with the North Park parking structure, that the majority of people will still look for free parking. The implementation of paid parking will cause increased traffic in park-adjacent neighborhoods, primarily Bankers Hill/Park West as individuals look for free parking of which there is very little. This scenario is discussed in Appendix D-1, Traffic Impact Study, Page 53, second paragraph in the EIR stating that about 50 displaced cars would end up parking on Balboa Drive and not in the Bankers Hill/Park West area. A more detailed technical analysis of this impact should be conducted and made available for public review.
- S-3 3. Traffic Impact Study, Proposed Project Traffic Generation, the following impacts were not analyzed and therefore were not disclosed: The Traffic Impact Study (Page 341) shows a net gain of 273 parking spaces. The Traffic Impact Study (Page 44, Proposed Project Traffic Generation) states that "the proposed project traffic volumes are the same as the no project condition. The project would not generate traffic, as proposed parking and roadways would not attract additional visitors to the park. The proposed project does not propose to alter the general external trip distribution patterns within the study area". By implementing a parking structure, the study area is generating traffic because the parking structure itself is a traffic generator. There are numerous ways to calculate traffic generation from implementing a parking structure:

- S-1 Noise impacts associated with construction activities were analyzed in Section 4.12.6.1.a acknowledging that construction noise could interfere with Park uses. With respect to the Organ Pavilion, the EIR concludes that the loudest noise levels at this location would be 72.8 dB(A) $L_{eq(12)}$ during Phase II and 73.8 dB(A) $L_{eq(12)}$ during Phase III. These noise impacts would be less than significant.

It is also noted, that typical working hours for construction would be from 7:00 a.m. to 7:00 p.m. Monday through Friday. As a condition of project approval, the timeframe of "after hours work" would be responsive to the schedule of a particular evening's event and shall be timed to be least impactful.
- S-2 A Barriers in Policy RE-D.1 refer to physical, not financial barriers, and encourage the application of Universal Design principles in development of recreational facilities – especially in lower income communities. The project would provide disabled paths of access, parking spaces, and tram cars. Therefore, the project was found to be in compliance with Policy RE-ID.1.
- B The project would be in compliance with BPMP policy (p. 172), which states, while allowing consideration of paid parking to cover parking structure construction and maintenance, and operation of the parking structure and tram system from the Palisades to the Plaza de Panama. The project proposes a paid parking fee to cover such costs.
- C Comment noted. See response to comment R-22.
- D The Urban Land Institute (ULI) Level of Service Conditions for Walking Distance from Parking Tables, as referenced throughout Section 9.3, determined that 2,000 feet is generally considered the maximum walking distance from a parking facility for an average person. Because neighborhood parking is further than 2,000 feet from all alternative parking lots, it is reasonably determined that park visitors will not park in the neighborhoods over use of the parking facilities.
- S-3 As expressed in the EIR, the increased parking capacity would not result in increased ADT. The parking structure itself is not considered a traffic generator. A park-and-ride lot is a destination for drivers who use the lot to make a transfer from single occupant vehicle mode (typically) to a carpool, vanpool, or transit mode.

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| <ul style="list-style-type: none"> • <u>SANDAG and City of San Diego criteria using Park and Ride Lots based on paved surface:</u> The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf) and the Trip Generation Manual within the Land Development Manual within the San Diego Municipal Code (http://www.sandiego.gov/planning/pdf/tripmanual.pdf) show that a Park & Ride Lot similar to a parking structure would generate from 400 ADT per acre to 600 ADT per paved acre. If the proposed parking structure measures 476' x 191' and it has 3 levels, this would amount to 6.26 acres; at 600 ADT/paved acres the traffic generation would amount to 3,757 ADT. <p>S-4</p> <ul style="list-style-type: none"> • <u>SANDAG criterion using Park and Ride Lots based on the number of parking spaces:</u> The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf) shows that a Park & Ride Lot similar to a parking structure would generate from 5 ADT to 8 ADT per parking space. Applying the higher value of 8 ADT per parking space to the net gain of 431 parking spaces in the Organ Pavilion Parking Structure (798 proposed minus 367 existing) it amounts to 3,448 ADT. <p>S-5</p> <ul style="list-style-type: none"> • <u>Parking occupancy factors criterion:</u> The traffic generation due to an increase in parking provided can also be developed on assumptions used for the parking structure queuing analysis; the percentage of the parking spaces assumed that will be occupied during peak conditions can be applied and a peak occupancy factor with a percentage can also be assumed to represent the maximum number of vehicles anticipated to enter or exit the parking structure during peak conditions. This criterion would also give a high number in ADT that was not considered in the traffic impact study. <p>S-6</p> <p>Therefore, the traffic generation from the parking structure itself needs to be part of the analysis included in the Traffic Impact Study, the traffic generation ADTs disclosed, and the impacts and mitigation need to be updated in the Traffic Impact Study and the EIR. The addition of ADTs creates a re-distribution in traffic patterns onsite and offsite. The EIR is deficient because it has not disclosed and analyzed the impacts by the additional ADTs due to the parking structure.</p> <p>S-7</p> <p>Traffic Impact Study and Site Development Plans, Site Development Plans sheets 2, 3, and 4; Traffic Impact Study Table 19, Traffic Safety not analyzed based on proposed road geometry and Level of Service (LOS). The following impacts were not analyzed, therefore they were not disclosed:</p> <p>A</p> <p>Sheets 2, 3, and 4 of the Site Development plans show Centennial Bridge (south of El Prado) and Centennial Road (north of Presidents Way) with sharp horizontal curves. Centennial Bridge has a radius of 180' and Centennial Road has radii of 102', 130', and 83' in different segments. A Public Residential Local Street in the City of San Diego has the requirements of a 100' minimum horizontal curve radius.</p> <p>B</p> <p>A Rural Local Road in the City of San Diego has the requirements of a 300' minimum horizontal curve radius.</p> | <p>S-4</p> <p>See response to comment S-3.</p> <p>S-5</p> <p>See response to comment S-3.</p> <p>S-6</p> <p>See response to comment S-3.</p> <p>S-7</p> <p>A</p> <p>The proposed roads are park roads which would have a posted speed of 15 mph. The proposed roads would have two 14-foot travel lanes and deviations from the commercial street section have been reviewed and approved by City's Development Services Department.</p> <p>B</p> <p>The roads within the Park are park roads, not residential local streets or rural local roads.</p> |
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LETTER

RESPONSE

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| <p>Centennial Bridge and Centennial Road do not meet the City standards from the <i>Street Design Manual</i> based on horizontal curve radii requirements.</p> <p>C The Traffic Impact Study, Table 19, Existing +Project, Roadway Segment Analysis (Weekday) shows that for a 2-Lane Park road the proposed LOS E Capacity is 10,000 ADT. Segment 29 (Centennial Bridge south of El Prado) shows 5,710 ADT and a LOS C. Segment 30, (Centennial Road north of Presidents Way) shows 7,020 ADT and a LOS C. A Public Residential Local Street in the City of San Diego has the requirements of a design ADT of 1,500. A Rural Local Road in the City of San Diego has the requirements of a design ADT of 1,500. Centennial Bridge and Centennial Road do not meet the City standards from the <i>Street Design Manual</i> based on design ADT.</p> <p>D The Traffic Impact Study does not include a Table for Saturday/Weekend Existing + Project table. Since no table was provided, the Saturday/Weekend ADT for Centennial Bridge and Centennial Road cannot be compared with the requirements of a Public Residential Local Street or a Public Rural Local Road.</p> <p>S-8 5. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure. The trend that is currently being applied to urban parks and historic districts is to pedestrianize those areas. According to a report published by the Center for City Park Excellence/ Trust for Public Land, <i>"Of the 10,000 or more miles of urban park roads in the U.S., the vast majority are still devoted primarily to automobiles. But a survey of big cities by the Center for City Park Excellence in 2007 found that at least 22 park drives, totaling more than 40 miles, have been closed to cars either all or part of the time."</i></p> <p>The report goes on to state that <i>"The single most significant—and unexpected—fact is that an automobile ban increases rather than decreases the number of persons using a park. A study of Golden Gate Park conducted in 2006 by the city of San Francisco showed a 116 percent in park visitors on Sundays (when John F. Kennedy Drive is closed to cars) than on Saturdays (when the roadway is not restricted)".</i> (Report is available online: Proceed Without Caution: City Parks Are Closing Their Roads to Cars, July 2008)</p> <p>Furthermore, European cities with great tourism appeal practice "managed traffic" or allow no traffic at all in the historical core, and none of them offer alternative access with a tram or shuttle. An excellent example is Siena, Italy, one of many historic cities where the visitor must park well outside the old city and walk a considerable distance to enter the historic core.</p> <p>The Balboa Park Plaza de Panama Project adds more roads within the core of the park than it actually closes.</p> <p>S-9 6. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, therefore the Balboa Park Plaza de Panama Project does not comply with General Plan, Mobility Element Policy ME.B.1: <i>"Work closely with regional agencies and others to increase transit ridership and mode share through increased transit service accessibility, frequency, connectivity, and availability"</i>.</p> <p>S-10 7. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.B.2:</p> | <p>S-7 (cont.)</p> <p>C The roads analyzed within the Park are park roads considered to have similar capacities as a Collector street (10,000 ADT).</p> <p>D The TIA did not include a table for Saturday/Weekend for Existing + Project table because the worst-case scenario was reported for the roadway segments. Based on existing counts, the roadway segments had higher overall ADTs on weekdays than Saturdays. Although not shown in a tabular format, exhibits show the volumes and ADTs for both weekdays and Saturdays (see TIA Exhibits 17 and 18).</p> <p>S-8 The intent of the project is to restore pedestrian areas to the Park safe from vehicular conflicts. Although the project includes the construction of a new road, no new trips would be generated. The newly constructed road would result in a redistribution of vehicular traffic away from areas in order to dedicate them as pedestrian only areas. The new road would also serve to reduce the amount of pedestrian/vehicular conflicts identified in BPMP and CMPP. The project would not encourage the use of automobiles but rather would assure proximate vehicular access to the Park institutions, while bypassing the newly claimed pedestrian areas. Overall, the project would reduce the number of feet of roadway by 400 feet and eliminate 14 existing vehicle/pedestrian conflict areas.</p> <p>S-9 See response to comment S-8.</p> <p>Mobility Element Policy M.E.B.1 is under the heading of Regional Agency Collaboration. It would therefore not apply to individual projects, such as the Balboa Park Plaza de Panama project. Notwithstanding its inapplicability, the project would comply with the intent of the policy to provide transit service accessibility. The Park would remain accessible by transit with existing MTS stops along two main bus lines (Route 120 and Route 7). Bus parking/drop-off has been provided on Presidents Way near the intersection of Presidents Way and the proposed pedestrian/tram promenade.</p> <p>S-10 See response to comment S-8. Mobility Element Policy ME.B.2 does not apply to the project. The project does not seek to provide any of the land uses identified in this policy.</p> |
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LETTER

RESPONSE

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| <p><i>"Support the provision of higher-frequency transit service and capital investments to benefit higher-density residential or mixed-use areas, higher-intensity employment areas and activity centers, and community plan-identified neighborhood, community and urban villages, and transit-oriented development areas."</i></p> <p>S-11 8. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure and it also does not provide exclusive bike lanes on the new roads, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy M.E.B.6: <i>"Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate."</i></p> <p>S-12 9. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure and it also does not provide exclusive bike lanes on the new roads, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.F.4: <i>"Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility users."</i></p> <p>S-13 10. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.1: <i>"Provide and manage parking so that it is reasonably available when and where it is needed"</i>.</p> <p>S-14 11. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.2: <i>"Implement innovative and up-to-date parking regulations that address the vehicular and bicycle parking needs generated by development"</i>.</p> <p>S-15 12. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.5: <i>"Implement parking strategies that are designed to help reduce the number and length of automobile trips. Reduces automobile trips would lessen traffic and air quality impacts, including greenhouse gas emissions"</i>.</p> <p>13. The Balboa Park Plaza de Panama Project encourages the use of automobile and automobile dependency by adding new roads without designated bicycle lanes and taking all the automobiles to the core of the park. The project does not provide or encourage alternative forms of transportation.</p> <p>Conventional planning tends to evaluate transportation primarily in terms of mobility, particularly motor vehicle mobility, ignoring tradeoffs with other forms of accessibility. For</p> <p>5</p> | <p>S-11 See response to comment S-8. Implementation of the project would result in safe pedestrian/bicycle areas removed from vehicular traffic. Specifically, the project would provide both pedestrian and bicycle circulation plans as illustrated in Figures 3-32 and 3-33, respectively. Additionally, in the City Master Bicycle Plan, April 2011, the designated Class III bike path is along Laurel Street and El Prado, down Pan American Road East to Presidents Way. Bicyclists would have the option of riding in the plazas and promenade, which would be the preferred route for cyclists looking for a slow Park experience or may use bicycle lanes along the Centennial Bridge. Overall, the intent of the project is to provide relevant benefits as described in Mobility Element Policy M.E.B.6.</p> <p>Additionally, the project would include amenities such as bike lockers, and on-site food services.</p> <p>S-12 See response to comment S-8. The project would include amenities such as bike lockers within the parking structure and on-site food services.</p> <p>S-13 See response to comments S-8 and R-21.</p> <p>S-14 See response to comment S-8. Policy ME.G.2 strives to reduce the amount of land devoted to parking through such measures as parking structures.</p> <p>S-15 See response to comment S-8. The project provides centralized parking. The location of the parking structure could reduce the time devoted to searching for parking space as well as individuals moving their cars throughout their visit to be closer to locations. Overall, the project would be compliant with this policy.</p> |
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“Support the provision of higher-frequency transit service and capital investments to benefit higher-density residential or mixed-use areas, higher-intensity employment areas and activity centers, and community plan-identified neighborhood, community and urban villages, and transit-oriented development areas.”

- 8. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure and it also does not provide exclusive bike lanes on the new roads, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy M.E.B.6: *“Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate”.*
- 9. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure and it also does not provide exclusive bike lanes on the new roads, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.F.4: *“Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility users.”*
- 10. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.1: *“Provide and manage parking so that it is reasonably available when and where it is needed”.*
- 11. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.2: *“Implement innovative and up-to-date parking regulations that address the vehicular and bicycle parking needs generated by development”.*
- 12. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.5: *“Implement parking strategies that are designed to help reduce the number and length of automobile trips. Reduces automobile trips would lessen traffic and air quality impacts, including greenhouse gas emissions”.*
- 13. The Balboa Park Plaza de Panama Project encourages the use of automobile and automobile dependency by adding new roads without designated bicycle lanes and taking all the automobiles to the core of the park. The project does not provide or encourage alternative forms of transportation.

Conventional planning tends to evaluate transportation primarily in terms of mobility, particularly motor vehicle mobility, ignoring tradeoffs with other forms of accessibility. For

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S-16 A See response to comment S-8. The overall vision of the project is to allow bicycle use into and throughout the Park free of vehicular conflict. This would be achieved by routing vehicular traffic around newly claimed vehicle-free areas.

The project would also support bicycle circulation. Bicycle routes are detailed in Figure 3-33. The bicycle circulation route would include bicycles accessing the Park via the Centennial Bridge and Road with accommodations for a shared bike/vehicle travel way.

Overall, the project would accommodate multi-modal traffic throughout the Central Mesa, including pedestrian, bicycle and tram usage.

B Comment noted.

LETTER

RESPONSE

example, conventional planning recognizes that road expansion improves automobile accessibility, but generally ignores the negative impact this tends to have on non-motorized accessibility (wide roads with high traffic volumes and speeds are difficult for pedestrians and cyclists to cross). Since most transit trips involve walking links, road widening can also reduce transit accessibility. Road widening also tends to stimulate sprawl, which reduces overall land use accessibility, increasing the amount of travel needed to reach destinations, further reducing accessibility by alternative modes.

These practices tend to create automobile dependency, that is, transportation and land use patterns that favor automobile travel over other modes. The opposite of automobile dependency is not a total lack of private vehicles, but rather, it is a multi-modal transport system, meaning that consumers have various transportation options from which to choose (walking, cycling, ridesharing, public transit, telework, etc.) and incentives to use each for what it does best.

S-17 14. Section 8.2, Effects Found Not To Be Significant-Special Events, the following impacts were not analyzed, and therefore were not disclosed: This is not an adequate analysis of potential impacts on important City recreational facilities during construction and after completion of the proposed project. Missing is an analysis of impacts to special events such as December Nights, Rock N' Roll Marathon, America's Finest City Half Marathon, and Earth Fair during the two years of project construction. Any of these events, some of which have been held consecutively for 34 years can be held during construction.

S-18 15. Executive Summary, Table S-1, Summary of Significant Environmental Analysis Results, Page S-43, b. Truck Hauling Noise, Noise levels at residences located adjacent to the haul and delivery route would not exceed the construction noise limit of 75 dBA. Additionally, noise levels would not exceed the noise ordinance limits shown in Table 4.12-3. Noise impacts due to truck hauling and deliveries would be less than significant: Impacts from Truck Hauling Noise are not less than significant because they were not analyzed adjacent as offsite impacts during construction and after project completion on Morley Field recreational facilities due to disposal of soil excavated for construction of the parking garage. Facilities potentially impacted include the Morley Field archery range, hiking trails, Florida Canyon trail connections, the Frisbee golf course, baseball fields, and play fields; activities potentially impacted include Little League, soccer, San Diego City College baseball games and practice, Velodrome races, and nationally prominent cross country races and tennis tournaments.

S-19 16. Section 3.4.7.3c, Staff and Employee Parking, The Draft EIR states "Currently, staff and employees utilize over 550 of the most centrally located parking spaces". Table 3-1 in Section 3.4.7.3 presents a combined total of 557 spaces in the Plaza de Panama, Alcazar, and Organ Pavilion parking lots. The EIR can be interpreted to state that all but 7 of the 557 spaces available at the parking lots directly affected by the Project are utilized by staff and employees, and trying to justify the need for a parking structure that can be avoided by implementing parking management, and therefore the project does not comply with the General Plan, Mobility Element Policy ME.G.1: "Provide and manage parking so that it is reasonably available when and where it is needed".

S-20 17. Section 3.4.7.3, Parking, The Draft EIR states repeatedly that the Project does not plan to implement an employee parking management plan. But based on the information presented in Section 3.4.7.3, employee parking management would be more effective than the proposed parking structure in enhancing proximate parking for visitors. All that would be needed is an

S-17 This comment references Section 8.5. See response to comment R-9.

S-18 See response to comment R-10.

S-19 See response to comment S-13.

S-20 See response to comment R-21. Any future parking management plan implemented by the City would support the project objectives, not diminish the benefits of the project.

See response to comment S-13.

LETTER

RESPONSE

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| <p>S-21 18. The Draft EIR should disclose a reasonable estimate of construction costs for the parking structure. Otherwise, the decision makers and the public cannot evaluate the feasibility of constructing a self-sustaining paid parking structure. Parking structures can be an extremely expensive way to provide parking spaces. A typically cited parking structure cost is \$20,000 per space, with the caveat that undergrounding parking structures can be twice to three times typical values. At \$20,000 per space, the proposed structure would cost nearly \$16 million. A 2008 presentation on parking structure costs at UCSD listed the cost of the 800-space University Center Parking Structure at \$27.1 million, or \$33,875 per space. At that price per space, the parking structure for the Project would cost more than \$27 million. Estimating the cost of the parking structure would involve some forecasting, but CEQA Guidelines Section 15144 states that <i>"While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can"</i>.</p> | <p>S-21 See response to comment R-22.</p> |
| <p>S-22 19. Traffic, Circulation and Parking, Section 4.4.1.4: The Draft EIR states that <i>"Considering the total amount of employees parking at the Central Mesa is about 500, employees displace up to 4,000 visitors per day from prime parking spaces"</i>. If this is the case, if the employee parking issue were resolved there would not be a need for additional parking. If this is the case, any of the parking being eliminated in the Plaza de Panama and Alcazar lots would not need to be replaced.</p> | <p>S-22 See response to comments R-21 and R-31.</p> |
| <p>S-23 20. Traffic, Circulation and Parking, Table 4.4-4: Table 4.4-4 in the Draft EIR presents existing parking conditions in terms of spaces occupied and percentage utilization. Under existing weekday conditions, 50 spaces are occupied at the Plaza de Panama lot, 136 are occupied at the Alcazar lot, and 348 are occupied at the Organ Pavilion lot. Assuming all of these parkers would use the parking structure of 798 spaces, the occupancy of the structure would be 67%, far below the 88% assumed by the parking consultant to estimate net annual parking revenue. This simple calculation does not take into account employee parking patterns and the fact that some ADA spaces would still be available at the Alcazar lot. The Draft EIR should provide an analysis of reasonably achievable parking structure occupancy with the values presented in Table 4.4-4. Such analysis is critical to determining if the objective of having a self-sustaining paid parking structure that provides funds for maintenance, the planned tram operations, and the debt service on the structure can be met by this component of the project.</p> | <p>S-23 See response to comment R-22.</p> |
| <p>S-24 21. Traffic, Circulation and Parking, Section 4.4.4.1, Impacts: The discussion on parking impacts references a paid parking structure in San Francisco to justify the contention that the proposed parking structure would have a high utilization and that parking fees would not be a deterrent to maintaining high occupancy levels. The Draft EIR should not be referencing a structure in another city when an example is nearby at University Avenue and 29th Street in the San Diego community of North Park. The response of drivers to this local parking structure that only</p> | <p>S-24 See response to comment K-49.</p> |

LETTER

RESPONSE

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| | <p>charges \$5 should be explored and cited in the Draft EIR. Word "on the street" is that the North Park structure is not highly utilized and drivers continue to prefer free parking available in the surrounding commercial and residential area.</p> | |
| S-25 | <p>22. Traffic, Circulation and Parking, Section 4.4.4.1, Impacts, the following impact was not analyzed, and therefore it was not disclosed: This section does not explore future parking scenarios that could occur with construction of the parking structure. One scenario is that there is too much free parking available in the surrounding area to generate adequate occupancy in the parking structure and create a self-sustaining facility. It is likely that the City would then make other lots paid also. Since this is a City project, such analysis would not be speculative.</p> | S-25 See response to comment R-22. |
| S-26 | <p>23. Traffic, Circulation and Parking, Section 4.4.4.1, Impacts, the following impact was not analyzed, and therefore it was not disclosed: This section does not explore the Zoological Society's likely response to creation of paid parking in the Central Mesa. According to Table 4.4-4, the zoo parking lot is 93% utilized during the week and 100% utilized on the weekend. The Zoological Society may determine that they must protect parking availability at the zoo lot. The changes that would occur to parking patterns and affordability of Balboa Park for all citizens of San Diego if the nearly 3,000 spaces at the zoo became paid parking needs to be analyzed and disclosed as offsite impacts. These questions can be addressed without speculation and should be answered in the Draft EIR.</p> | S-26 See response to comment R-35. |
| S-27 | <p>24. No New Parking Structure Alternative, Table 9-1: The conclusion of Issue n-1: Public Facilities/Road Maintenance are incomplete. The No New Parking Structure Alternative would generate fewer new maintenance obligations for the City because a parking structure would not be built. In addition, recently repaved roadways along the proposed haul route would not be impacted by construction because no soil would have to be excavated and hauled in the East Mesa. Therefore, the No New Parking Structure Alternative would have less public services and facilities impacts than the Project. Table 9-1 should be corrected.</p> | S-27 See response to comment R-47. |
| S-28 | <p>25. Environmentally Superior Alternative, Section 9-4: This section discusses the Environmentally Superior Alternative. The selection of the Half-Plaza Alternative as the environmentally superior alternative is not supported by the alternative impacts summary in Table 9-1 of the Draft EIR.</p> | S-28 See response to comments R-52 and R-55. |
| S-29 | <p>26. Environmentally Superior Alternative, Section 9-4: This Section of the Draft EIR should state clearly if either of the No Project alternatives are considered environmentally superior. These would be the No Development/Existing Conditions Alternative and the Central Mesa Precise Plan Alternative.</p> | S-29 The selection of the environmentally superior alternative is discussed in Section 9.4. |
| S-30 | <p>27. Environmentally Superior Alternative, Section 9-4: If any of the No Project alternatives is environmentally superior, then the Draft EIR should identify the environmentally superior alternative among the "build" alternatives in accordance with CEQA 15126.6(e)(2). The evaluation should focus on which alternative best reduces environmental impacts caused by the Project (particularly the impacts that are significant and unmitigable).</p> | S-30 See response to comments R-52 and R-55. |
| S-31 | <p>28. Environmentally Superior Alternative, Section 9-4: The Phased Alternative is the same as the Project, so should be excluded from being considered as the environmentally superior alternative.</p> | S-31 See response to comments R-52 and R-55. |
| S-32 | <p>29. Environmentally Superior Alternative, Section 9-4: The following should be included in the comparison of traffic capacity impacts: of the nine roadway segments that are projected to</p> | S-32 See response to comment R-66. |

operate poorly (meaning at level of service (LOS) E or F) in 2030 without the Project, seven segments also would operate poorly with the Project, one segment would be eliminated by the Project (the Mall south of El Prado), and one would be improved by becoming a different segment of the Project (President's Way east of Pan American Road). A new road segment created by the Project, Centennial Bridge south of El Prado, is projected to operate at LOS F in 2030. The Modified Precise Plan without Parking Structure alternative is projected to worsen street segment operations at only one location in 2030, the Mall south of El Prado within the park. The other three candidate alternatives are projected to worsen street segment operation significantly at four locations outside of the park in 2030 due to traffic rerouting; two segments for each alternative also are projected to operate poorly with the Project and two are not.

S-33 30. Environmentally Superior Alternative, Section 9-4: The following should be included in the comparison of traffic capacity impacts: the five intersections that would operate poorly in 2030 without the Project also would operate poorly with the Project. One intersection, Park Boulevard/Space Theatre Way, could have improved operations with installation of a traffic signal, which would mitigate impacts from the No New Parking Structure and Inspiration Point Parking Structure alternatives that affect this intersection. (This impact is incorrectly identified as unmitigable in the Draft EIR.) The no New Parking Structure Alternative would not have any other intersection impacts in 2030 identified as significant and unmitigable. The Inspiration Point Parking Structure Alternative would have one additional intersection impact identified as significant and unmitigable in 2030, the Stop Light (One Way) Alternative would have none, and the Modified Precise Plan Parking Structure Alternative would have one.

S-34 31. Environmentally Superior Alternative, Section 9-4: The No New Parking Structure, Inspiration Point Parking Structure, Stop Light (One-Way), and Modified Precise Plan without Parking Structure alternatives perform the best at reducing Project impacts. These alternatives should be the candidates for the environmentally superior alternative and discussed in more detail in Section 9.4 of the Draft EIR.

S-35 32. Environmentally Superior Alternative, Section 9-4: The DRAFT EIR could apply a simple, quantified screening analysis using the comparison of impacts in Table 9-1 to develop a more objective evaluation than presented in Section 9.4. An accurate and objective comparison of the Project and alternatives is critical because the City has a duty to avoid or minimize environmental damage where feasible in accordance with CEQA Guidelines Section 15021, which notes in part: "(1) In regulating public or private activities, agencies are required to give major consideration to preventing environmental damage. (2) A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment."

S-36 33. Under the "Inspiration Point parking lot" scenario, why was the assessment of this option addressed/considered only when paired with a closing of the Cabrillo Bridge. This does not independently nor comprehensively evaluate this parking structure alternative. If the Cabrillo Bridge were open to traffic it is fair to assume that with a large new parking resource at inspiration point, not only are the 57 spaces removed from the Plaza de Panama recouped, (this removal being the supposed focus of this amendment effort), but the public in general and certainly the 80% of travelers coming from outside of the local area would be aware of this new large parking resource and accompanying access into the park. This could intuitively be argued to reduce further the amount of traffic coming into the park across the Cabrillo Bridge and through the southwest corner of the Plaza de

S-33 See response to comment R-67.

S-34 See response to comment R-55.

S-35 See response to comments R-55 and R-72.

S-36 See response to comments K-11 and K-12.

LETTER

RESPONSE

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| <p>Panama thus reducing further the predicted pedestrian conflict in the Plaza all the while avoiding concerns about historic impacts to the Cabrillo Bridge/buildings or Alcazar Garden with the Bypass Bridge.</p> <p>S-37 34. Why did the "no alternative option" not recognize and include the obvious advantage of assuring that planning options remain available in the future on the west side of the park to be able address both near and long term transit mode changes, facilitate the ability to incorporate different modes in the future and ability to better correspond with not only SANDAG 2050 planning models but locally considered transit and modal changes for streets such as 5th and 6th avenue on the west side of the park.</p> <p>S-38 35. Under the assessment of the "Proposed Project Alternative" <u>un-mitigable</u> impacts associated with the bypass bridge, there was no recognition or even discussion of such concerns as the new auto bridge rendering the future of altering or modifying the use of the Cabrillo Bridge, (i.e. to mixed modal, closed to auto-oriented use, etc.), impossible. Given the cost of building the bridge, it being a permanent structure with little other use, and the auto-intensive use it vests on the bridge makes in reality even near term (10-15 year) changes in public transit sentiments and uses as well as city planning shifts in focus of modal changes on the bridge impossible. How can objective studies/arguments in support of the bridge disregard a discussion of whether the by-pass bridge memorializes auto use as the primary use of the Cabrillo Bridge in perpetuity? - That it cannot realistically be closed permanently to auto use or have used altered such to auto focus modal use upon pedestrian, bike, transit or a mix there-of.</p> <hr/> <p>S-39 An overarching concern is the apparent dismissal of many years of expert study and community input that resulted in broad support for the BPMP/CMPP vision and goals. This highly inclusive process stands in stark contrast to the current shepherding of the proposed project-specific amendments' potential for irreversible damage to the park, San Diego's historic treasure. Most public meetings have focused on "after-the-fact" reports by applicant consultants, versus genuine "give and take" discussions. NPPC has not been part of any discussions related to proposed project alternatives.</p> <p>S-40 The proposed project conflicts with two basic values of existing policies: 1) preservation of the park's historic assets; and 2) reduction of reliance on the automobile through integrated modes of alternative transportation within and connecting to the park. The proposed project introduces a massive, incompatible bypass bridge with the potential to permanently scar the grandeur of Balboa Park's historic entryway. The proposed bridge will carry automobiles to a centralized parking structure within the park's core, attracting even more vehicular traffic into the park. While an Organ Pavilion parking structure is allowed by existing plans, the structure was envisioned as only one element of a comprehensive traffic and parking management strategy that would include peripheral parking structures, public transit, shuttle systems, walking, and bicycling. <i>There is no need to build a new, permanent, auto-centric bridge to accommodate this vision.</i> Further, as park-related circulation planning has evolved around the globe, an effective best practice has become relocating parking spaces to a park's periphery, a strategy being applied to signature urban parks worldwide.</p> | <p>S-37 The requirement for the analysis of each alternative was two-fold. First, the impacts of each alternative was disclosed, similar to those of the project in the body of the EIR, but in lesser detail; and second, to determine whether the alternative meets the project objectives. Both requirements have been met in evaluating each alternative. Citing advantages or disadvantages are outside the objective scope of the analysis pursuant to CEQA.</p> <p>S-38 A The project does not include anything that would prevent or restrict the alteration or modification of the Centennial Bridge or Cabrillo Bridge in the future.</p> <p>B The comment calls for speculation beyond the scope of the EIR. Comment noted.</p> <p>S-39 Comment noted.</p> <p>S-40 Comment noted.</p> |
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LETTER

RESPONSE

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| <p>S-41 The city appears to be willing to compromise the park’s vision based on the promise of private funding tied to an auto-centric plan. Yet what could be more apropos for the Balboa Park centennial celebration than the reinstatement of a streetcar system incorporating original Class 1 PCC streetcars that carried international visitors to the 1915 Panama-Cal Expo — as has been suggested?</p> | <p>S-41 Comment noted.</p> |
| <p>S-42 This ill-thought-out project appears to be motivated by a misplaced sense of urgency to access private funding to meet 2015 centennial celebration deadlines at any cost, including placing general fund dollars at risk. NPPC views the proposed amendments as short-sighted, supporting a \$40 million “over-kill” approach to eliminating 54 parking spaces from the Plaza de Panama with a net gain of only 273 spaces.</p> | <p>S-42 Comment noted.</p> |
| <p>S-43 There is a conflict created by the simultaneous rushing through of the plan amendments for this project and the EIR process. The proposed project’s scope is so broad and fundamentally in opposition to the BPMP and CMPP that it triggers the need for a comprehensive Community Plan Update versus an amendment process. The concurrently occurring plan amendments for the proposed project have been so closely customized to the Plaza de Panama project that consideration of alternative projects has been effectively precluded. This project-specific approach to plan amendments creates a conflict with the EIR process, as well as a major constraint to future park enhancements if the “Plaza de Panama Circulation and Parking Structure” project does not go forward.</p> | <p>S-43 Comment noted. As discussed in Section 4.3.2.1, the bridge’s features would be consistent with the bulk and scale of the large concrete abutment of the Cabrillo Bridge.</p> |
| <p>S-44 Proposed Plaza de Panama Project is inconsistent with city and regional plans related to Balboa Park land use, circulation, and parking. Relevant plans are listed below. Policy inconsistencies are discussed in following sections.</p> <ul style="list-style-type: none"> • City of San Diego General Plan, 2008. • Balboa Park Master Plan (BPMP), 1989, Estrada Land Planning, Inc.; Amended 1997, Estrada Land Planning (Balboa Park Activity Center); Amended 1998, Marie Burke Lia, Attorney at Law (Natural History Museum expansion); Amended 2004, Austin Veum Robbins Partners (underground parking and Park Boulevard Promenade); Amended 2004 (Veterans Memorial Garden). • Balboa Park Central Mesa Precise Plan (CMPP), 1992, Estrada Land Planning, Inc.; Amended 1998, Maria Burke Lia (Activity Center); amended 2002, Wheeler, Wimer, Blackman & Assoc. (West Prado Arcade); Amended 2004, MacLeod Consulting Services/Estrada Land Planning (Park Boulevard Parking Structure and Promenade). • Balboa Park Land Use, Circulation, and Parking Study, 2004, Jones & Jones/Civitas Inc. • Parking Management Action Plan for Balboa Park Central Mesa & Inspiration Point, 2006, Tilghman Group/Civitas Inc. • The Soul of San Diego: Keeping Balboa Park Magnificent in Its Second Century, 2008, Trust for Public Land. • The Future of Balboa Park, 2008, Balboa Park Committee. • SANDAG 2050 Regional Transportation Plan (RTP), 2011. <p>COUNCIL-ADOPTED PLANS</p> <p>City of San Diego General Plan, Adopted 2008</p> <p style="text-align: center;">11</p> | <p>S-44 The project’s consistency with relevant portions of the City’s General Plan, BPMP, and CMPP are discussed in Sections 4.1.3.1a, b, and c, respectively. The EIR acknowledges the project’s inconsistencies with these plans which result in significant and unmitigable impacts. A Statement of Overriding Considerations, pursuant to CEQA Guidelines 15093 has been prepared and will be presented to the decision makers (City Council).</p> <p>The other plans and studies identified here are not adopted land use plans or policy documents governing the development, use or operations within Balboa Park. Consistency of the project with these plans or studies may be considered by the approving bodies for the project, but is outside the scope of review of this EIR.</p> <p>The SANDAG 2050 RTP pertains to regional transportation planning needs; the scope of the project’s traffic impacts is limited to the Park and its immediate environs.</p> |

LETTER

RESPONSE

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| <p>The proposed project conflicts with numerous general plan policies.</p> <p>S-45 <u>Historic Preservation Element</u> <i>This general plan element “guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources” and states “The protection of these resources and preservation of San Diego’s past for its current and future residents are essential components of San Diego’s historic preservation program.”</i></p> <p>The proposed project negatively impacts the following historic designations and listings:</p> <ul style="list-style-type: none"> • El Prado Complex: National Register of Historic Places (1976) • Balboa Park: National Register Historic Landmark, National Historic Landmark District (1977) • Cabrillo Bridge: National Register of Historic Places, contributing element to the state-designated Cabrillo Freeway (SR 163) Historic Resource (see below) • Cabrillo Freeway: California Register of Historic Resources, California Historic Parkway, City of San Diego Historic Landmark, eligible for listing in National Register of Historic Places <p>S-46 The City of San Diego has a long established process of giving full consideration of comments on specific projects/processes by including the National Park Service, the State Historic Preservation Officer (SHPO), and Caltrans on projects within National Historic Landmark boundaries. A 2/11/11 letter from the California SHPO states, “We would strongly discourage any major construction projects that would have significant adverse impacts on the landmarks or remove any historic fabric from contribution elements such as the Cabrillo Bridge. We urge you to adopt criteria that would enhance the contributing elements and remain balanced with the original setting and character of the Landmarks.” The proposed project would impose irreversible damage on Balboa Park/Cabrillo Bridge historic resources, including eliminating a portion of the historic Cabrillo Bridge wall, permanently impairing the original 1915 view of the California Building by installation of a traversing modern bypass bridge, and scarring the park’s historic landscape by massive earth removal and retaining walls. A 5/20/11 letter from Caltrans states, “The city’s plan to add a bypass bridge...would in all likelihood result in significant impacts not only to the bridge itself, but to the state-owned Cabrillo Freeway Historic District.”</p> <p>S-47 The proposed plan does not meet Secretary of the Interior Standards for Historic Preservation, and the EIR addresses the incorrect standard: (Ref: Executive Summary, Historic Preservation)</p> <p>The Secretary for the Interior Standard state that “National Historic Landmarks, or many buildings individually listed on the National Register warrant Preservation or Restoration”, however the EIR discusses “Rehabilitation”, an inappropriate standard given the significance of the historic resource.</p> <p>S-48 <u>Mobility Element</u> <i>The general plan’s mobility element promotes a “balanced, multi-modal transportation network that minimizes environmental and neighborhood impacts...and encourages transit to link with often-visited destinations.”</i></p> <p>The proposed project will increase park/neighborhood mobility impacts by allowing a bypass bridge to carry cars from Cabrillo Bridge to a new interior parking structure, which will place</p> | <p>S-45 Comment noted.</p> <p>S-46 This comment refers to an email from State Historic Preservation Officer to National Park Service which was not submitted in response to the Draft EIR. For the formal comment letter submitted by the State Historic Preservation Officer on behalf of the Office of Historic Preservation – Department of Parks and Recreation, see Letter F.</p> <p>Section 4.2 concluded that the project would result in significant and unmitigated impacts to the Balboa Park NHL. The analysis further determined that the project would not result in any impacts to the Cabrillo Freeway Historic District (Section 4.2.2.1b).</p> <p>S-47 As disclosed in Section 4.2, construction of the Centennial Bridge would have a significant and unmitigable impact on the Balboa Park NHL. A Statement of Overriding Considerations, pursuant to CEQA Guidelines 15093 has been prepared and presented to the decision makers (City Council).</p> <p>Other than the Centennial Bridge and aspects of Centennial Road, the project would fully comply with SOI Standards for Rehabilitation. Rehabilitation is an accepted treatment for historical resources in Balboa Park and has been used, along with reconstruction, on many approved projects in the Park including, the Casa de Balboa Reconstruction, House of Charm Reconstruction, the Air and Space Museum Courtyard Cover, and the House of Hospitality Reconstruction.</p> <p>S-48 See response to comment S-8 regarding encouragement of automobile use and reduction of pedestrian/vehicular conflicts.</p> <p>See response to comment S-2d regarding a discussion of neighborhood parking.</p> |
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LETTER

RESPONSE

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| <p>emphasis on the automobile versus multi-modal transportation. The amendments allow for a project design that replaces existing low-level vehicular/pedestrian conflicts with new, more severe conflicts in the Alcazar parking lot and at the intersection of the Cabrillo Bridge and Bypass Bridge. Proposed parking fees will encourage cars to park on perimeter streets, impacting neighborhood residential and business parking availability.</p> <p>S-49 <u>Urban Design Element</u> According to the general plan, "Urban Design policies capitalize on San Diego's natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of our neighborhoods, strengthens the natural and built linkages..."</p> <p>A B The proposed project is detrimental to Balboa Park's distinctively historic character and to the natural setting by allowing major earth removal resulting in extensive retaining walls. Further the fencing/barriers required for public safety are not discussed in the EIR and have not been shown to the public as part of the public process.</p> <p>S-50 <u>Conservation Element</u> The general plan's conservation element guides wise use of natural resources including topography, landscapes, views, and energy, and promotes reduced dependence on automobiles, which in turn lowers greenhouse gas emissions.</p> <p>A-C The proposed project is not designed to reduce vehicular traffic or greenhouse gases. The project is expected to generate more traffic and GHG emissions, as well as negatively impact historic views and topography.</p> <p><u>Land Use and Community Planning Element</u> The project lacks defined transportation system integration with surrounding community-planning areas.</p> <p><u>Noise Element</u> Rerouted traffic along the southern side of Alcazar Garden, combined with the array of parking and drop-off activities (ADA parking, valet and taxi staging, freight delivery, shuttle and private passenger drop-off) is expected to negatively impact the garden and the House of Pacific Relations International Cottages' passive recreation and meditative settings.</p> <p>Balboa Park Master Plan (BPMP), Estrada Land Planning, Inc., Adopted 1989; Amended 1997, 1998, 2004</p> <p><i>The BPMP serves as the park's "community plan." Its goal is to "to preserve, maintain, and enhance the 1915 and 1935 Exposition buildings, arcades, plazas, landscape horticultural elements, as well as the other building and site features which contribute to the local significance and the National Historic Landmark." The BPMP also includes a policy to enhance major off-site and internal viewpoints. Deviations from this plan require plan amendments that are "consistent with the goals and policies of the general plan."</i></p> <p>The proposed project allows for cutting into historic Cabrillo Bridge and imposing a modern bypass bridge on the California Building's (House of Charm's) historic view. The applicant argues that although architect Bertram Goodhue conceived the California Quadrangle and the Museum of Man with its dome and tower, and the California Building as an ancient European</p> | <p>S-49 A See response to comment S-61. The placement of the parking structure is in a location already occupied by a parking lot. Therefore, the current natural setting for the new structure is already disturbed. Additionally, the proposed park located atop the structure would enhance the existing condition through reclamation of parkland for recreational use furthering the intent of this General Plan Element.</p> <p>B Fencing proposed around the rooftop park is discussed in the EIR. Figures 3-26 and 3-27 show conceptual renderings of the parking structure and rooftop park. As stated in Section 3.5.6, a nine-foot-wide walkway and decorative railing would form the eastern edge of the rooftop park. The design would allow a natural connection between the necessary fencing and the natural landscape. A trellis system would also be attached to the exterior façade of the parking structure and over time, the vegetation would fill in the entire trellis system, resulting in a living green wall. See Figure 3-39a and 3-39b for details of the proposed native garden plantings.</p> <p>S-50 A The project would result in no net increase in traffic. As discussed in Section 4.9 the net increase in greenhouse gas emissions due to construction and operation of the project would not exceed screening criteria.</p> <p>B It is disclosed in Section 4.2 that implementation of the project would result in significant impacts to historical resources.</p> <p>C As discussed in Section 4.3.4.1 excavation of the Organ Pavilion parking lot would create manufactured slopes of up to 40 percent gradient and up to 22 feet in height along its entire eastern elevation and up to 25 percent gradient and 7 feet in height near the structure's southern entrance. Manufactured slopes created in conjunction with construction of the Organ Pavilion parking structure would exceed the City threshold. However, the existing landform condition has already been substantially altered through grading and development of the Central Mesa to accommodate the existing on-site land use and circulation patterns. Therefore, the project would not result in impact to any natural landform or steep slopes and impacts would be considered less than significant.</p> |
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emphasis on the automobile versus multi-modal transportation. The amendments allow for a project design that replaces existing low-level vehicular/pedestrian conflicts with new, more severe conflicts in the Alcazar parking lot and at the intersection of the Cabrillo Bridge and Bypass Bridge. Proposed parking fees will encourage cars to park on perimeter streets, impacting neighborhood residential and business parking availability.

Urban Design Element

According to the general plan, "Urban Design policies capitalize on San Diego's natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of our neighborhoods, strengthens the natural and built linkages..."

The proposed project is detrimental to Balboa Park's distinctively historic character and to the natural setting by allowing major earth removal resulting in extensive retaining walls. Further the fencing/barriers required for public safety are not discussed in the EIR and have not been shown to the public as part of the public process.

Conservation Element

The general plan's conservation element guides wise use of natural resources including topography, landscapes, views, and energy, and promotes reduced dependence on automobiles, which in turn lowers greenhouse gas emissions.

The proposed project is not designed to reduce vehicular traffic or greenhouse gases. The project is expected to generate more traffic and GHG emissions, as well as negatively impact historic views and topography.

S-51 Land Use and Community Planning Element

The project lacks defined transportation system integration with surrounding community-planning areas.

S-52 Noise Element

Rerouted traffic along the southern side of Alcazar Garden, combined with the array of parking and drop-off activities (ADA parking, valet and taxi staging, freight delivery, shuttle and private passenger drop-off) is expected to negatively impact the garden and the House of Pacific Relations International Cottages' passive recreation and meditative settings.

S-53 **Balboa Park Master Plan (BPMP), Estrada Land Planning, Inc., Adopted 1989; Amended 1997, 1998, 2004**

The BPMP serves as the park's "community plan." Its goal is to "to preserve, maintain, and enhance the 1915 and 1935 Exposition buildings, arcades, plazas, landscape horticultural elements, as well as the other building and site features which contribute to the local significance and the National Historic Landmark." The BPMP also includes a policy to enhance major off-site and internal viewpoints. Deviations from this plan require plan amendments that are "consistent with the goals and policies of the general plan."

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The proposed project allows for cutting into historic Cabrillo Bridge and imposing a modern bypass bridge on the California Building's (House of Charm's) historic view. The applicant argues that although architect Bertram Goodhue conceived the California Quadrangle and the Museum of Man with its dome and tower, and the California Building as an ancient European

S-51 The transportation systems outside of the Park are not intended to be affected by the project. A discussion regarding existing and future transit and bicycle accessibility based on the City Master Bicycle Plan is referenced in the TIA under the heading of Transit and Bicycle Accessibility.

S-52 As discussed in Section 4.12.3.1 the project would not increase traffic-generated noise. Noise levels at the northern edge of the Alcazar Garden would decrease as a result of the removal of vehicular traffic from El Prado. Noise levels at the middle of the garden would also decrease. While noise levels at the southern edge of the garden were calculated to increase approximately 1 dB, this is an increase imperceptible to the human ear. The forecasted noise level at the future southern edge of the garden would be less than the current noise level at the existing northern level. Overall, noise levels would decrease in the Alcazar Garden. Section 4.12.6(c) has been supplemented with more detail about potential traffic impacts to the International Cottages/House of Pacific Relations during construction. Post project, noise impacts relative to the International Cottages/House of Pacific Relations would be less than significant.

S-53 A See response to comment S-47.

LETTER

RESPONSE

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| <p>B</p> <p>town rising majestically above the canyon, this perspective has been hidden from San Diegans for decades by eucalyptus trees and therefore is not worth preserving. We disagree and feel that the “discovery” of such a hidden treasure should be revealed for all to enjoy rather than permanently destroyed. As one local writer put it, “What lover of beauty would tolerate a windbreak around the Taj Mahal?” In addition, the proposed intensified Alcazar Garden parking lot activities (two lanes of traffic, ADA parking, valet and taxi staging, freight delivery, shuttle and private passenger drop-off) are all fully visible from the garden, negatively impacting the garden views and tranquility.</p> <p>S-54 <i>The BPMP emphasizes implementation of transportation and parking management techniques—such as relocating, at a minimum, employee and volunteer parking to the periphery, and prohibiting Naval Medical Center motorists from using dedicated park spaces—as an initial priority and states, “Accessibility to and within Balboa Park shall be increased through alternative modes of transportation including transit, inter-park shuttles, and intra-park tram, and bicycle facilities.” Among BPMP goals are:</i></p> <ul style="list-style-type: none"> • <i>“to de-emphasize the automobile while increasing public access.”</i> • <i>“to create within the park a more pedestrian-oriented environment, reduce automobile and pedestrian conflicts, and minimize through traffic.”</i> • <i>“to improve public access to the park through an improved integrated circulation system, convenient drop-off points, better parking management, improved signage, and increased security”</i> <p>The proposed project is inconsistent with BPMP’s emphasis on alternative transportation solutions. The BPMP supports reclaiming plaza space for pedestrians. However, the proposed project would allow this to be accomplished at the expense of bringing even more vehicular traffic— attracted by an onsite parking garage—into the park’s interior via a massive new bypass bridge.</p> <p>S-55 <i>In 2004, the BPMP was amended to allow an underground parking structure/transit center and pedestrian promenade on Park Boulevard in front of the zoo. The project would relocate internal parking to the park’s periphery, facilitate external public transit connections to the Park, and link pedestrian access from the Park’s northern end to the Prado. (The zoo parking structure/transit center/promenade project was put on hold pending completion of the city-sponsored “Balboa Park Land Use, Circulation and Parking Study.”)</i></p> <p>While the existing BPMP and CMPP allow for an Organ Pavilion parking structure, these plans envisioned this structure as only one component of a comprehensive strategy of peripheral parking, parking and traffic management, easily accessible park shuttles, walking and bicycling facilities, and links to public transit. These components are missing from the proposed project. Further, park planning trends discourage locating parking facilities within a park’s interior. BPMP amendments adopted in 2004, incorporating the Park Boulevard underground parking structure and transit center, reflected updated practices that relocate parking to a park’s periphery. Today, signature parks across the country have embraced this strategy, investing in integrated alternative transportation systems and reducing or even eliminating automobile use within the parks’ interiors.</p> <p>S-56 <i>The BPMP provides for the Cabrillo Bridge to “carry only eastbound automobile traffic, freeing the westbound lane for the intra-park tram, inter-park shuttle, bicycles, and pedestrian use.” The</i></p> | <p>S-53 (cont.)</p> <p>B See response to comment S-52. There is a proposed loading zone for larger vehicles located south of the Centennial Road that would allow for freight deliveries. Like today, large freight deliveries are anticipated to only occur during off-peak hours and access would be managed on a case by case basis by the receiving institution and coordinated to limit disruptions similar to how large deliveries are managed today.</p> <p>S-54 Comment noted.</p> <p>S-55 Comment noted. The BPMP and CMPP are planning documents for the future of the Park and were not intended to be implemented all at one time. The project would be considered one phase of implementing these two plans.</p> <p>S-56 Comment noted.</p> |
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LETTER

RESPONSE

plan allows for the elimination of all automobile traffic from the 6th Avenue bridge entrance to the park at some future point per the following: "When offsite parking, transit, tram, and shuttle systems provide adequate access to the Prado and Palisades areas, consider closing Cabrillo Bridge to automobiles." It also calls for shuttle stops to be provided "in the center of the Prado to facilitate access to all institutions."

A proposed project would eliminate any ability to manage bridge traffic as needed (e.g., to temporarily close one lane to auto traffic for use by pedestrians, bicycles, and shuttles, or to reverse auto travel direction to accommodate time-sensitive events such as theatre performances). Once a \$25 million bypass bridge is constructed to carry automobiles into the park's newly constructed \$40 million parking garage, there will be no further desire to close the Cabrillo Bridge and bypass bridge to automobiles, eliminating traffic management options and forever cementing a freeway through the middle of the park.

S-57 Overall, the applicant's proposed transit-related activities are unclear. The list of "Major Project Elements" includes "developing a new tram system that transports visitors between Pan American Road and the Plaza de Panama." However, this tram route is extremely limited in scope. The applicant provides a "Proposed Alternative Transportation System" map that depicts "light rail transit, park shuttle, and historic shuttle routes, and station and shuttle stops." However, there is no description of these systems or how they will operate independently or collectively. This raises a number of questions: How will a park-wide tram needs be met? Who will fund and manage the proposed new system? When will it come on line? Will the existing shuttle system running along the Prado and looping north on 6th Avenue continue its current route? How will the two shuttle systems interface with each other? How and when will they link with the other transit systems shown on the applicant's map?

S-58 The proposed project creates access issues for disabled individuals and for special event needs such as weddings. The amendments eliminate the Plaza de Panama drop-off location in front of the Museum of Modern Art, which currently provides centralized ADA access to west Prado facilities. Disabled visitors parking in the Alcazar lot will need to cross two lanes of bypass bridge traffic to access the Prado. There are questions about the ease of accessibility from the drop-off area to the Prado and mall. The proposed project eliminates shuttle stops will be provided in the center of the Prado to facilitate access to all institutions. So where will the shuttle stops be located and how convenient will they be for disabled visitors?

S-59 Finally, the proposed project allows for funding the new tram's operation and maintenance with parking fees from the parking structure. Given that the viability of financing the parking structure's construction and operation with parking revenue is questionable, the viability of adding tram expenses is highly unlikely.

S-60 **BALBOA PARK CENTRAL MESA PRECISE PLAN (CMPP), Estrada Land Planning, Inc., Adopted 1992; Amended 1998, 2002, 2004**

The CMPP, prepared over a period of three years, refines several BPMP recommendations and is the basis for many Land Use, Circulation and Parking Study recommendations. The CMPP places emphasis on "creating a pedestrian-oriented park with convenient accessibility, preserving historical significance while meeting functional needs..." In 2004, the City Council amended the CMPP to allow for the Park Boulevard underground parking structure, transit center, and Promenade connecting to the Prado.

S-57 The proposed tram service is intended to support the project's parking structure. The proposed tram route service is shown in Figure 3-30. This new tram service would supplement the existing tram service (Red Trolley) that would continue to provide transportation from Inspiration Point and the West Mesa.

The City may choose in the future to expand the new tram service to incorporate routes currently served by the existing trolley service; however, that proposal is not part of this project.

S-58 ADA accessible parking is located in the Alcazar parking lot. In addition, ADA parking would be available in the parking structure and transportation s provided by the tram service. As shown in Figures 3-19 and 3-30, raised, controlled ADA/pedestrian crossings would provide for ADA compliant access from the Alcazar parking lot north to the Alcazar Garden and El Prado areas as well as eastward along the rear of the Mingei Museum to the southern portion of the Plaza de Panama. The proposed tram route would provide service from the Pan American Plaza parking lot to the Plaza de Panama with potential expansion to the Plaza de California and to the Inspiration Point parking lot. Note that such an expansion of the new tram service and any changes to the trolley service are outside of the scope of the project and are at the discretion of the City's Park and Recreation Department.

S-59 See response to comment R-22.

S-60 See response to comment S-48.

LETTER

RESPONSE

Circulation Element

Current non-automobile modes of transportation serving the park are restricted to limited bus service on Park Boulevard and limited shuttle service from the Inspiration Point parking lot. The circulation element states: "Reducing the presence of the automobile will emphasize natural qualities of the park while recapturing the original intent of the Central Mesa design concept... With higher visitor levels in the future, alternate forms of transportation will become a necessity..." Objectives include:

- Reduce the amount of vehicular traffic through the Central Mesa
- Reduce pedestrian and automobile conflicts
- Utilize a park tram system to move visitors through the Central Mesa
- Incorporate off-site parking and shuttle service on peak use days
- Encourage the use of public transit as a primary means of access to the Park

A The proposed project will result in more automobile traffic entering the Central Mesa via the new bypass bridge to use the new Organ Pavilion parking garage. The plan calls for a circulation design that replaces existing pedestrian/automobile conflicts with more severe conflicts at the Alcazar Garden parking lot and at the intersection of the two bridges. The proposed shuttle system is limited to moving people from the southern end of the Plaza de Panama to the northern end of the Pan American Plaza. There are no defined linkages between this small-scale shuttle system, other shuttle systems, peripheral parking lots, or external transit, including between existing bus routes and the future Bus Rapid Transit (BRT).

D The CMPP allows for the removal of all parking from the Plaza de Panama and for a one-way automobile route along its southwestern edge, making the plaza available to pedestrians and special events. The route would be designed with the ability to easily reverse traffic direction, and to close automobile traffic entirely during specified hours or events. This much less expensive and more environmentally sensitive approach to removing all parking and reducing automobile/pedestrian conflicts within the Plaza de Panama eliminates any need for a bypass bridge. It should be noted that although the BPMP recommends eliminating all automobile parking from the Plaza (which we support), it does not call for eliminating automobile traffic from the Plaza, instead "minimizing" such traffic. (The SOHO alternative "Precise Plan Light" plan would comply with this policy).

S-61 Architectural and Landscape Element
A key goal is "to rehabilitate and modify the physical environment of the Central Mesa in a manner which preserves its historic significance and provides for future uses."

A The proposed project will result in damage to a portion of the historic Cabrillo Bridge wall parapet and an impeded view of the historic California Building's southeast wall, both designed to create an ambience of entering a fortified European hilltop town. The State Historic Preservation Officer, the National Trust for Historic Preservation, and Caltrans have each written letters expressing concern about the project's impacts on the park's historic designations. The amendments would also impact park landscape by allowing the removal of approximately 12,600 truckloads of earth and construction of excessive retaining walls in Palm Canyon and elsewhere.

B The impacts of the disruption to the park's institutions during construction are insufficiently addressed, as well as the fair use of citizens of the park's amenities.

S-60 (cont.)

- A** See response to comments S-8.
- B** As discussed in Section 4.4.3.1a, the removal of vehicular traffic from the internal plaza areas, would reduce the majority of existing pedestrian/vehicular conflicts in the Park.
- C** See response to comment S-70.
- D** Comment noted.

S-61

- A** The EIR discloses the unmitigable historic impacts resulting from construction of the Centennial Bridge. These impacts are specifically associated with the bridge's inconsistency with SOI Standards due to an alteration to historic spatial characteristics of the NHLD.
- B** The project includes the removal of 142,000 cubic yards of soils for construction of the underground lot. As discussed in Section 4.3.4.2, the excavation would not impact any natural landform and, therefore, would not require a deviation from the City's ESL Regulations. Impacts associated with retaining walls are discussed in Section 4.3.5.1. Table 4.3-2 identifies the maximum heights and lengths of all proposed retaining walls, the locations of which are illustrated on Figure 4.3-28. With respect to the Palm Canyon and elsewhere, the majority of walls would be located below, and be least visible from, restored pedestrian areas, including the Mall, Pan American Road East/the Pan American Promenade, and the rooftop park. All walls would be screened by appropriate landscape treatments for the area of the Park in which the walls would be located. Therefore, with incorporation of these design treatments, visual impacts associated with retaining walls would be less than significant.
- C** The project construction and phasing plan is disclosed in Section 3.8. Project construction would result in loss of the use of Park facilities.

LETTER

RESPONSE

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| <p>S-62 SUPPORTING CITY STUDIES</p> <p>City-commissioned studies have been conducted since adoption of the BPMP and CMPP to assess Balboa Park circulation and parking issues in more depth. Study findings have reaffirmed BPMP and CMPP mobility strategies.</p> | <p>S-62 Comment noted.</p> |
| <p>S-63 Balboa Park Land Use, Circulation and Parking Study Findings and Options, Jones & Jones/ Civitas, Inc., Completed 2004</p> <p><i>City Council hired Civitas and partners to prepare a Balboa Park Land Use Circulation and Parking Study, which resulted in a findings and options report in 2004 and an action plan in 2006. Both involved extensive public input. (Note: The Planning Commission reviewed the recommendations but they were not processed as plan amendments due to lack of funding.) Civitas' findings reinforced BPMP and CMPP emphasis on "expanded public transportation access throughout the park, parking management implementation (an underlying priority), and relocation of existing parking facilities to the park's periphery along Park Boulevard." The 2004 report recommends 6 barometers by which all park improvements should be evaluated; 5 are discussed here.</i></p> <p><u>Reclaim, Restore and Conserve Parkland</u> <i>The study found that park space available without fees, membership, or other requirements had decreased to 600 acres. The study recommended preserving unencumbered space for all park visitors.</i></p> <p>The proposed project further restricts park use by imposing parking fees.</p> | <p>S-63 Over 80 percent of the Balboa Park parking spaces (not including the Zoo parking lot) would continue to be free of charge. The project does not anticipate the loss of visitors.</p> |
| <p>S-64 <u>Protect and Enhance Historic Resources</u> The proposed project is in conflict with several local, state, and national historic designations.</p> | <p>S-64 The project would not affect the historic designation of the Park. The APE considered in Historic Resources Technical Report (HRTR)</p> |
| <p>S-65 <u>Implement Parking Management and Appropriate Parking</u> <i>Park employees and volunteers use an estimated 1000 parking spaces in Central Mesa lots. Naval Medical Center visitors use Inspiration Point lots, an option many park visitors are largely unaware of. The study stresses the need to implement parking management strategies and relocate existing parking to the park's periphery.</i></p> <p>The proposed project does not address the need for parking management or periphery parking.</p> | <p>(Appendix B-1) includes the entire Central Mesa south of Old Globe Way, Cabrillo Canyon, and a large portion of the West Mesa and includes everything built, planted, or altered before 1936. As disclosed in Section 4.2, the HRTR analyzes the impacts to the APE and determined that the project would not comply with the SOI Rehabilitation Standards 2 and 9, and that it would have a significant and unavoidable impact on Cabrillo Bridge and the California Quadrangle, and to a lesser extent, on the Balboa Park Historic District. Notwithstanding this conclusion, the HRTR concludes that the project would not result in the de-listing of Balboa Park as an NHL district. (HRTR page 150).</p> |
| <p>S-66 <u>Implement Shuttle and Transit</u> <i>The study points out that the current loop trolley system lacks adequate capacity, and is not easily accessible by the disabled. It is perceived more as a visitor attraction than an efficient transportation solution. The study recommends instituting an efficient and user-friendly shuttle system within the park's center, linking park destinations to peripheral parking lots and to external transit, including existing bus routes and future Bus Rapid Transit (BRT).</i></p> <p>The proposed project does not adequately address the proposed small-scale tram system's links to internal/external transportation systems.</p> | <p>S-65 See response to comment R-21.</p> |
| <p><u>Distribute Costs and Benefits Fairly</u></p> | <p>S-66 See response to comment S-9.</p> |

LETTER

RESPONSE

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| <p><i>Public input emphasized that “the park belongs to everyone, and improvements should seek the highest and best use of the park’s precious resource.”</i></p> <p>S-67 The proposed parking structure relies on parking fees to pay off bonds with no guarantee that adequate revenue will be generated to cover bond debt. In fact, the city’s Independent Budget Analyst’s Report #11-44 (7/15/11) states that given the “abundance of free parking,” the 88 percent (now 75% but the same point applies) occupancy rate the projected that is required to adequately service the debt seems unlikely to be attainable, putting the city’s general fund at risk. Additionally, parking garage fees will result in motorists seeking spaces in the park’s ‘free’ parking lots, restricting accessibility for their patrons and pressuring the institutions (see 12/15/10 letter from the San Diego Zoological Society to Mayor Sanders) to adopt parking fees themselves. The result will be greater hardship on lower-income park users. Also this will impact the Park’s institutions, who rely heavily on volunteers, many of whom are retirees and on fixed incomes.</p> <p>S-68 Parking Management Action Plan for Balboa Park Central Mesa & Inspiration Point, Tilghman Group/ Civitas Inc., Completed 2006</p> <p><i>The 2006 Civitas Action Plan recommends specific parking management approaches for the Central Mesa and Inspiration Point, and more effective use of shuttle vehicles. Existing ridership limitations were identified, including use of open-air buses designed for tour groups, not for shuttle riders; high floors, multiple steps, single doors, and separate wheelchair lifts; and a no-standing policy. The plan recommends modifying the shuttle-system routes and reallocating hours of service based on demand.</i></p> <p>The proposed project does not address the proposed shuttle’s operational aspects, including its relationship to the existing shuttle system or linkages with other transportation modalities.</p> <p>S-69 The Future of Balboa Park, Balboa Park Committee, Adopted 2008</p> <p><i>This study assessed the park’s financial structure and states: “Due to limited staff resources, parking and traffic cannot be adequately managed” and “although the Land Use, Circulation and Parking Study recommends hiring a transportation officer to identify and implement programs that will mitigate problems in these areas, this position has never been funded.”</i></p> <p>The proposed project does not adequately address traffic or parking management policies.</p> <p>S-70 SANDAG 2050 Regional Transportation Plan (RTP), Adopted Oct. 28, 2011 and Metropolitan Transportation Systems (MTS) Feasibility Study, Ongoing</p> <p><i>SANDAG’s 2050 RTP is the region’s long-range mobility plan for multi-modal transportation. Along with the City’s general plan mobility element, the RTP stresses the importance of integrating transportation and land-use decisions and “using multi-modal strategies to reduce congestion and increase travel choices.” The RTP plans an I-805 north-south trolley corridor from University City to Chula Vista, supported by three new east-west trolley lines. One of these trolley lines will link downtown San Diego, Balboa Park, surrounding communities, and SDSU. In March 2011, MTS began studying the feasibility of establishing a fixed guideway Balboa Park streetcar line to reconnect downtown San Diego (from the City College transit station) with Balboa Park—reviving a similar Park Boulevard route operating from the late 1800s to 1949. MTS is considering using vintage streetcars from the new Downtown Silver Line, which will soon include two original Class 1 cars that operated during the 1915 Panama-Cal Expo.</i></p> | <p>S-67 The project parking structure demand projections are based on the assumption that a majority of Balboa Park visitors would park in free lots.</p> <p>Adequate free parking would be available for visitors, staff, employees, and volunteers not choosing to utilize the project parking structure. See response to comment S-2.</p> <p>S-68 The proposed tram service addresses the limitations noted in the 2006 Civitas Action Plan. For information relating to shuttle system or linkages with other transportation modalities, see response to comment S-9.</p> <p>S-69 See response to comments R-21 and S-13.</p> <p>S-70 See response to comments N-4f and S-57.</p> |
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The proposed project submittal documentation is unclear regarding integration of the proposed new shuttle system with other systems, including bus routes, the future BRT, and the planned trolley line linking downtown and Balboa Park. It is our understanding that the two vintage streetcars that transported attendees of the 1915 Expo could potentially be restored and ready for the 2015 centennial celebration.

S-71

Proposed Organ Pavilion Parking Structure Math:

Currently Existing, already-Paid-for Parking Spaces:

| | | |
|---------------------------------------|------------|--------------------|
| Organ Pavilion Lot | 367 | |
| Alcazar Gardens | 136 | (retain 32 spaces) |
| Plaza de Panama | 54 | |
| Total existing spaces - 0 cost | 557 | |

| | | |
|--|------------|---|
| Total # of spaces in New Parking Structure | 798 | |
| Less # of existing parking spaces | 525 | (557 - 32 retained in Alcazar gardens) |
| Total # of New parking spaces created | 273 | Note: 100 of these will be reserved for Valet Parking |

Actual Cost per New Parking Space:

| | |
|--|--------------------|
| Estimated Parking Structure cost: | \$15,000,000.00 |
| Divided by # New Parking Spaces created: | 273 |
| Real cost per New Parking Space | \$54,945.05 |

Add in a conservative 50% Debt Service Coverage Requirement for the Bond Issue

| | |
|--|------------------------|
| Jacobs Team Estimated Parking Structure cost: | \$15,000,000.00 |
| Plus 50% DSC per Old Town Parking Study | \$7,500,000.00 |
| Estimated Structure cost including Debt Service | \$22,500,000.00 |
| Divided by # of new parking spaces created | 273 |
| Cost per New parking spot including Debt Service: | \$82,417.58 |

Debt Service Cost as estimated by the Independent Budget Analyst (IBA):

| | | | |
|---|-----------------|------------|----------------------|
| Parking Structure cost as estimated by Jacobs Team | | \$ | 15,000,000.00 |
| Annual Debt service on \$14M Bonds per IBA | \$ 1,200,000.00 | x 30 years | \$ 36,000,000.00 |
| Estimated Structure cost including Debt Service | | \$ | 51,000,000.00 |
| Divided by # of <u>new</u> parking spaces created | | | 273 |
| Cost per New parking space including Debt Service: | | | \$186,813.19 |

Annual Costs to come out of any Parking revenues before Debt service (per IBA report):

| | |
|--|---------------|
| Estimated Maintenance for roof park per IBA | \$ 45,000.00 |
| Annual Security Service Costs recommended by IBA | \$ 175,000.00 |
| *Annual Operating costs @ \$450/space x 785 spaces | \$ 353,250.00 |
| Maintenance for Parking Section | (Unknown) |

S-71 See response to comment R-22.

Estimated additional annual operation costs:

\$ 573,250.00

Link to the City of San Diego Independent Budget Analyst's (IBA) Report on the Plaza de Panama Project:
http://www.sandiego.gov/iba/pdf/11_44.pdf

Concerns Regarding the Paid Parking Structure Proposed in the Plaza de Panama Plan:

Link to the City of San Diego Independent Budget Analyst's Report (IBA) report on the Plaza de Panama Project:
http://www.sandiego.gov/iba/pdf/11_44.pdf

Per the Independent Budget Analyst's (IBA) report, the Plaza de Panama Committee projects an **occupancy level of 88%** for the garage, and project that the parking revenue will not only pay off the \$14M in bonds, the debt service on those bonds, the maintenance and operating costs for the structure, but also pay for operation of a "people-mover" shuttle from the garage to the Plaza de Panama. **The IBA report expresses doubt that these revenue/occupancy projections can be met.**

Per the IBA Report: "Current Plaza de Panama, Alcazar Garden, Organ Pavilion, and Palisades Lot usage data was analyzed by the Committee's parking consultant in projecting revenue to be generated for the new proposed parking structure. The analysis assumes the visitors/employees/valet patrons served by these lots would be users of the new paid parking structure. The analysis also assumes that the proximity of the structure to the core of the park will create additional demand for parking."

The IBA Report goes on to say:

"The availability of free parking in other areas of the park poses a challenge for occupancy assumptions for the paid parking garage on typical non-event days at the park. As noted above, there are currently approximately 6,500 available free parking spaces in the Central Mesa and Inspiration Point areas of the Park. Free parking exists at 15 lots including the Zoo, Inspiration Point and the Federal/Aerospace Lot. Free parking also exists along Park Boulevard and in surrounding neighborhoods. In reviewing parking supply and demand statistics provided by the Committee's parking consultant, the IBA acknowledges that during non-event peak visitor times at the park, such as free Tuesdays at the park, parking close to park exhibits and destinations can experience high levels of occupancy. Even so, during those times of peak visitation at the park, parking is still available at Inspiration Point and Federal/Aerospace Lots further away, which are underutilized at approximately 50% capacity. The Inspiration Point and Federal/Aerospace Lots offer 1,264, and 509 spaces, respectively."

Concerns: A lot of expense and impacts to environmental and historic resources for very little gain

- The proposed project removes 557 existing, **FREE** and already-paid-for parking spaces, as well as existing and already-paid-for infrastructure like restrooms and established park landscaping. All this for a net gain of 273 new Pay-to-park spaces, 100 of which will be reserved for Valet parking. While the structure will have a total of 798 spaces, all will be pay-to-park, in contrast to the 557 existing Free-to-park spaces.
- The Paid Parking Structure is very unlikely to meet the required occupancy level to generate sufficient income to service the debt on \$14M unless every single parking space in and around Balboa Park is pay-parking. (See originally-projected vs. actual occupancy numbers for the North Park Parking Structure as a benchmark for expectations)
- 12/15/2010 the San Diego Zoo wrote a letter expressing their concern that paid parking in the park core would put unwarranted pressure on their Zoo parking lot, and force them into making that lot "pay-to-park" also. The Zoo's current lease permits them to charge for parking in their parking lot. Should they choose to do this as a consequence of the proposed paid parking structure, this would further reduce free parking in the vicinity of the park and place additional pressure on other park parking lots.
- The revenue from the paid parking in the structure is supposed to pay for the internal "people mover" tram. How will this be paid for if the revenue projections are not met? Will a revenue shortfall result in less frequent tram operation?
- The parking structure roof-top deck garden with buildings, restrooms, etc. is not included in the Plaza de Panama Committee's cost estimate of \$15M (nor in the total project \$40M budget) but instead relies on additional donation funding from the Plaza de Panama foundation. If donations are not forthcoming, will we be left looking at a plain roof with no improvements? What is the guarantee that the restrooms to be located on the roof will be built? Especially since the main park restrooms across from the Organ Pavilion, as well as those in the Alcazar Garden parking lot will be demolished for this project.

- Many of the Park institutions depend on unpaid volunteers for their ongoing operations and support. What impact will paid parking throughout the park have on these volunteers, and will they be willing to pay-to-park or will the institutions be willing to subsidize their paid parking?
- Paid parking in the park puts an unreasonable burden on families and economically disadvantaged residents wishing to use the park, and disproportionately emphasizes valet parking.

North Park Parking Structure, Projections vs. Reality:


of Parking Spaces: 388
 Parking Rates/Fees: \$.50/half hour to park with a flat rate of \$5 after 5 pm
 Projected Revenue: Per the 2003 Walker Parking Study
 Net operating revenue predicted to increase from \$380,000 to \$710,000 over 7 years
 Actual Annual Revenue: + \$150,000/year (has averaged same or less since it opened) < 1/2 the lowest projected revenue
 Projected Expenses: \$ 218,000/year (not including bond payments or debt service)
 Actual Annual Expenses: \$ 195,000/year (maintenance, operation, etc., does not include debt service on bonds)
 Current Occupancy rate: + 25%

\$150K revenue less \$195K in expenses leaves a \$45k shortfall every year

Transient Turns:

= Number of tickets / number of spaces / number of days in the period (30 or 31 days)
 Average transient turn number of .25 = 25% occupancy rate

| Level of Demand at North Park Parking Garage | | | | |
|--|-------------|----------------|--------|-----------------|
| June 2009 - June 2010 | | | | |
| Period Begins | Period Ends | Tickets Issued | Spaces | Transient Turns |
| 6/1/2009 | 6/30/2009 | 1,868 | 388 | 0.16 |
| 7/1/2009 | 7/31/2009 | 1,785 | 388 | 0.15 |
| 8/1/2009 | 8/31/2009 | 2,098 | 388 | 0.17 |
| 9/1/2009 | 9/30/2009 | 2,206 | 388 | 0.19 |
| 10/1/2009 | 10/31/2009 | 3,434 | 388 | 0.29 |
| 11/1/2009 | 11/30/2009 | 2,891 | 388 | 0.25 |
| 12/1/2009 | 12/31/2009 | 2,848 | 388 | 0.24 |
| 1/1/2010 | 1/31/2010 | 3,347 | 388 | 0.28 |
| 2/1/2010 | 2/28/2010 | 3,591 | 388 | 0.33 |
| 3/1/2010 | 3/31/2010 | 3,669 | 388 | 0.31 |
| 4/1/2010 | 4/30/2010 | 3,457 | 388 | 0.30 |
| 5/1/2010 | 5/31/2010 | 4,044 | 388 | 0.34 |
| 6/1/2010 | 6/30/2010 | 2,393 | 388 | 0.21 |
| Totals | | 37,611 | | |
| Averages | | 2,893 | 388 | 0.25 |



TRANSPORTATION CAPITAL STUDY
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Table 12. Net Operating Revenue, 2005-2014

| | 2005 | 2006 | 2007 | 2008 | 2009 |
|-----------------------|-------------|-------------|-------------|-------------|-------------|
| Operating Revenue | \$180,000 | \$181,000 | \$200,000 | \$280,000 | \$1,150,000 |
| Operating Expenses | (\$70,000) | (\$70,000) | (\$60,000) | (\$70,000) | (\$70,000) |
| Operating Profit | \$110,000 | \$111,000 | \$140,000 | \$210,000 | \$1,080,000 |
| Net Operating Revenue | \$180,000 | \$181,000 | \$200,000 | \$280,000 | \$1,150,000 |
| | \$110 | \$111 | \$140 | \$210 | \$1,080 |
| Operating Revenue | \$1,000,000 | \$1,100,000 | \$1,200,000 | \$1,300,000 | \$1,400,000 |
| Operating Expenses | (\$300,000) | (\$300,000) | (\$300,000) | (\$300,000) | (\$300,000) |
| Operating Profit | \$700,000 | \$800,000 | \$900,000 | \$1,000,000 | \$1,100,000 |
| Net Operating Revenue | \$1,000,000 | \$1,100,000 | \$1,200,000 | \$1,300,000 | \$1,400,000 |

Notes:
 1. Operating Revenue includes parking fees, advertising, and other income.
 2. Operating Expenses include salaries, benefits, and other operating costs.
 3. Operating Profit is the difference between Operating Revenue and Operating Expenses.
 4. Net Operating Revenue is the difference between Operating Revenue and Operating Expenses, adjusted for depreciation and other non-cash items.

LETTER

RESPONSE

S-72
A-C

A judge’s determination that the City of San Diego entered into an illegal Memorandum of Understanding with the Plaza de Panama Committee severely compromises the EIR process on this project. The accelerated nature of the public process and the ignoring of public input does the same. The alternatives explored in this EIR are not as suggested during the public process, and several suggestions have been ignored.

S-73
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G

Proposed Master Plan and Precise Plan amendments for this project are inconsistent with several elements of the General Plan, and are inadequately address in this EIR:

- The proposed project does not reduce traffic (MOBILITY ELEMENT/NOISE ELEMENT)
- The proposed project does not reduce vehicle-pedestrian conflicts (CIRCULATION ELEMENT)
- Policies in the proposed plan amendments for this project would need to be revised to be up to date with Greenhouse Gases and Stormwater Regulations and are therefore inadequately addressed in this EIR (CONSERVATION ELEMENT)
- Current plan to maintain the organ pavilion parking structure contradicts Jones & Jones (2006?) report which included an appropriate public process, and is closer to current planning thinking. The reason it was not implemented it was because they run out of funds (PUBLIC FACILITIES, SERVICES & SAFETY ELEMENT)
- Trams proposed are insufficient (MOBILITY ELEMENT)
- Proposed people movers do not connect to mass transit (MOBILITY ELEMENT)
- Need better bond studies to see if incoming revenue will pay the debt service (PUBLIC FACILITEIS, SERVICES & SAFETY ELEMENT)
- Proposed project would not reduce greenhouse gases (CONSERVATION ELEMENT)
- The original intention of the project is to remove the cars from the Plaza de Panama. The proposed plan adds more cars overall (MOBILITY ELEMENT, PARK AND RECREATION ELEMENT)
- Lack of integration of Community Plan Updates (North Park, Uptown, Greater Golden Hill) into the proposed amendments (LAND USE AND COMMUNITY PLANNING ELEMENT)
- Increasing parking, more cars parked and less transit (MOBILITY ELEMENT)
- Makes inappropriate changes to historically designated landmarks (HISTORIC PRESERVATION ELEMENT)
- Organ Pavilion Parking Structure design is no longer open to a local competition (ECONOMIC PROSPERITY ELEMENT/URBAN DESIGN ELMEMENT)
- Implementation of paid parking (RECREATION ELEMENT/ECONOMIC PROSPERITY ELEMENT)
- The *Balboa Park Master Plan* preparation and ultimate adoption took 9 years of preparation, including a 3 year public input process. The *Balboa Park Central Mesa*

- S-72 A See response to comment R-3.
- B Comment noted.
- C Pursuant to CEQA Guideline Section 15126.6(c), the City is required only to include a reasonable range of alternatives in the EIR. The EIR provides consideration of a reasonable range of alternatives and in many instances relies on suggestions by the public for the identification of alternatives.
- S-73 A See response to comment S-8.
- B The project would eliminate 14 out of the 20 identified locations of existing vehicular/pedestrian conflict within the Park.
- C The project includes amendments to the BPMP and CMPP requiring revisions to these documents. The project is consistent with City and state regulations relating to storm water and GHG. These subjects are discussed in Sections 4.16 and 4.9, respectively. The EIR concludes that through conformance with regulations, impacts associated with storm water runoff would be less than significant. With respect to GHG emissions, a GHG analysis was conducted concluding that the project would be consistent with the goals and strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions. As stated in Section 4.9.3.2, net increase in GHG emissions due to construction and operation of the project would not exceed relevant screening criteria and impacts would be less than significant.
- D The Jones and Jones Study is not an adopted Plan for the Park. See response to S-44.
- E See response to comment J-1b.
- F See response to comment S-9.
- G Comment noted. See response to comment R-22.

A judge's determination that the City of San Diego entered into an illegal Memorandum of Understanding with the Plaza de Panama Committee severely compromises the EIR process on this project. The accelerated nature of the public process and the ignoring of public input does the same. The alternatives explored in this EIR are not as suggested during the public process, and several suggestions have been ignored.

S-73

Proposed Master Plan and Precise Plan amendments for this project are inconsistent with several elements of the General Plan, and are inadequately address in this EIR:

- The proposed project does not reduce traffic (MOBILITY ELEMENT/NOISE ELEMENT)
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- Policies in the proposed plan amendments for this project would need to be revised to be up to date with Greenhouse Gases and Stormwater Regulations and are therefore inadequately addressed in this EIR (CONSERVATION ELEMENT)
- Current plan to maintain the organ pavilion parking structure contradicts Jones & Jones (2006?) report which included an appropriate public process, and is closer to current planning thinking. The reason it was not implemented it was because they run out of funds (PUBLIC FACILITIES, SERVICES & SAFETY ELEMENT)
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- The *Balboa Park Master Plan* preparation and ultimate adoption took 9 years of preparation, including a 3 year public input process. The *Balboa Park Central Mesa*

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S-73 (cont.)

- H The General Plan Conservation Element calls for a city-wide reduction in greenhouse gases over time. However, projects are required to reduce greenhouse gas emissions on an individual basis. The GHG emissions associated with the project would be below the City's screening threshold of 900 MTCO2E per year for purposes of the CEQA analysis.
- I See response to comment S-8.
- J Comment noted.
- K See response to comment S-8.
- L Impacts to historic resources are disclosed in Section 4.2
- M Comment noted.
- N Comment noted.
- O Comment noted.

LETTER

RESPONSE

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| <p>S-73 P Q R S T U V W X</p> <p><i>Precise Plan</i> also took several years of preparation and public input process prior to the final adoption.</p> <ul style="list-style-type: none"> • The Cabrillo Bridge was closed twice in the past, and in both cases attendance in the park went up; the bridge was closed once to repave it, and the second time during a 3-month period for retrofitting. The Plaza de Panama’s refusal to request attendance, traffic, circulation & parking studies when the Cabrillo Bridge is closed to vehicular traffic during special events or during the Cabrillo bridge’s closure for seismic retrofitting during 2012 means that impacts to surrounding communities are inadequately studied. • The Bypass bridge alternative was studied and rejected during the public process for the original <i>Balboa Park Master Plan</i>. The issues that existed 20 years ago when the original plan was being put together are still applicable today. • The currently proposed Parking structure behind the organ pavilion is part of the <i>Balboa Park Central Mesa Precise Plan</i>, however its design was supposed to be awarded through a national competition. Eliminating this competition and replacing it with a unilateral decision by San Diego’s Mayor and Irwin Jacobs calls into question the adequacy of the public process, and this EIR. • An earlier “<i>Balboa Park Land Use, Circulation, and Parking Study</i>” prepared by Civitas recommends the parking structure be located along Florida Canyon, but was not adopted at the time due to funding issues. The <i>Balboa Park Central Mesa Precise Plan</i> should have been updated a long time ago to show all parking structures removed from the central core of the park and placed along the periphery instead. • The proposed parking structure adds only 273 <i>New</i> spaces with 100 of those being reserved for valet parking. Too much money for too little benefit. • It is possible that the Palisades parking lot will also close in the future, making the need for parking on the periphery of the park greater. These impacts are inadequately addressed. • It is clear that the revenue from the proposed parking structure would be insufficient to pay off the bond debt, operations and maintenance of the structure, and would not leave sufficient revenue available to operate the “people mover” tram as proposed. According to the IBA report “<i>The proforma assumes an average 88% annual occupancy for the proposed parking garage</i>”. The IBA report then goes on to state that “<i>The availability of free parking in other areas of the park poses a challenge for occupancy assumptions for the paid parking garage on typical non-event days at the park. As noted above, there are currently approximately 6,500 available free parking spaces in the Central Mesa and Inspiration Point areas of the Park. Free parking exists at 15 lots including the Zoo, Inspiration Point and the Federal/Aerospace Lot. Free parking also exists along Park Boulevard and in surrounding neighborhoods, it is not likely to get to those levels because unless for special events, most of the time the parking structure would be empty.</i>” This places the burden of financing the parking structure on the taxpayers and these economic impacts have been inadequately disclosed • The concern is that, once it becomes apparent that the revenue from the parking structure is insufficient due to lack of occupancy and available free parking elsewhere, the city will make all parking “pay to park” inside the park, negatively impacting the ability of the city’s average and poor citizens to enjoy the park’s amenities. Conflicts with General Plan’s Economic Prosperity Element • If paid parking is instituted, people will look elsewhere; the Zoo will soon start charging and everyone will be impacted. Conflicts with General Plan’s Economic Prosperity Element | <p>S-73 (cont.) P Q R S T U V W X</p> <p>Comment noted. Previous planning documents were reviewed and studied throughout the initial planning of the project. These included the Balboa Park Master Plan, Central Mesa Precise Plan, subsequent amendments to the referenced documents, the 2004 Jones and Jones Study and the 2006 Tilghman Parking Management Study.</p> <p>Special events that close the bridge for a period of time, usually carry regional detour plans that would alter collection of traffic data. Furthermore, traffic studies do not use special events as a basis for traffic analysis and design. The impacts to surrounding communities have been adequately studied, using approved SANDAG forecast models, which is the standard for such analysis. It should also be noted that the Cabrillo Bridge Seismic Retro has not yet occurred and Caltrans is not currently scheduled to begin their work until mid 2013. Bridge closure for the seismic retro fit will not occur until the first quarter of 2014, but is being coordinated with the project.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. Although it is part of the BPMP and the CMPP to restore this area to pedestrian/park use, there is currently no proposal to close the Palisades parking lot.</p> <p>See response to comment R-22.</p> <p>See response to comment R-22.</p> <p>Comment noted.</p> |
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LETTER

RESPONSE

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| <p>Y</p> <ul style="list-style-type: none"> • Concurrently occurring plan amendments for this project are a cause for concern. While the EIR has to meet CEQA, overriding findings for the EIR can always be made by the City if it has already “shoe-horned” the project into the plan amendments. • Regarding the reducing traffic through the center of the park; An inexpensive alternative is to use removable bollards as currently used in other US cities and in Europe and in other parts of the world, in order to diffuse vehicular traffic. • Parking in the Plaza de Panama is easily removable today without building a Bypass bridge <p>Z</p> <p>S-74</p> <p><i>Balboa Park Master Plan</i></p> <p>The Balboa Park Master Plan was adopted in 1989 after 8 years of community input; the text in the currently proposed amendment is about to make drastic changes to the original plan and has not had positive public input to date.</p> <p>A</p> <ul style="list-style-type: none"> • The adopted Balboa Park Master Plan (Figure 13) does not include a bypass at the Cabrillo Bridge but rather shows a reversible one-way route through the Plaza the Panama; which makes the Cabrillo Bridge more pedestrian and transit friendly. • The adopted plan shows the Cabrillo Bridge carrying only eastbound traffic, freeing the westbound lane for the intra-park tram, inter-park shuttle, bicycles, and pedestrian use; the proposed amendment shows two-lane vehicular traffic through the Cabrillo Bridge. • The adopted plan calls for the parking facility at the Palisades to be subject of an architectural design competition to ensure the widest possible search for a quality design; the amendment gives the applicant (“the Plaza de Panama Committee”) the freedom to choose the architect for the parking structure, eliminating the option for the best possible design to be integrated into the area in question. • The adopted plan calls for automobile access from the parking structure at the Palisades to the Prado to pass under the promenade; the proposed plan eliminates this option. • Alternative D in the 1986 and 1987 EIR is the environmentally preferred Alternative as shown in Figures 28 and 34. This closes the Cabrillo Bridge to vehicular traffic and it uses Quince Street as its main vehicular access from the west. Not adequately studied or addressed in this EIR <p>D</p> <p>E</p> <p><i>Balboa Park Central Mesa Precise Plan:</i></p> <ul style="list-style-type: none"> • The Balboa Park Central Mesa Precise Plan was adopted in 1992 after 3 years of community input; the text in the proposed amendment is about to make drastic changes to the original plan and has not had positive public input to date. • The Balboa Park Central Mesa Precise Plan does not include a bypass at the Cabrillo Bridge, but rather details a reversible one-way route through the Plaza de Panama which removes most of the vehicular traffic from the Plaza de Panama without construction of the bypass, making the Cabrillo Bridge more pedestrian and transit friendly. • The 2-way bypass road in the proposed amendment does not separate vehicles and parking from pedestrian corridors, since pedestrians will tend to use the same road, and the narrow cross section with two 13’ vehicular travel lanes will create traffic jams when a vehicle gets a flat tire or ceases to operate because no shoulders are provided. • The proposed project reconfigures the Alcazar Garden Parking Lot, creating a LOT of conflicts between pedestrians and vehicles, because it provides handicapped parking/accessible parking, valet drop-off, and bus drop-off all at the same location as the main vehicular entrance to the park, directly conflicting with vehicular traffic that is passing by in order to get to the parking structure. <p>24</p> | <p>S-73 (cont.)</p> <p>Y</p> <p>Comment noted.</p> <p>Z</p> <p>Comment noted.</p> <p>S-74</p> <p>A</p> <p>The project includes the adoption of an amendment to the CMPP. The CMPP Amendment would revise the overall circulation concept of the project to allow two-way traffic on the Cabrillo Bridge while closing El Prado to through traffic.</p> <p>B</p> <p>Comment noted.</p> <p>C</p> <p>Comment noted;</p> <p>D</p> <p>The project would provide automobile access that would pass under the promenade, consistent with the BPMP. See Figure 3-2.</p> <p>E</p> <p>CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives to the project or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. Furthermore, CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered by the Lead Agency, but were rejected as infeasible. Section 9.2 identifies the Quince Street Access Alternative as one considered but rejected due to the increased scope of improvements and extent of grading operations and landform alteration required for its implementation.</p> |
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- Concurrently occurring plan amendments for this project are a cause for concern. While the EIR has to meet CEQA, overriding findings for the EIR can always be made by the City if it has already “shoe-horned” the project into the plan amendments.
- Regarding the reducing traffic through the center of the park; An inexpensive alternative is to use removable bollards as currently used in other US cities and in Europe and in other parts of the world, in order to diffuse vehicular traffic.
- Parking in the Plaza de Panama is easily removable today without building a Bypass bridge

Balboa Park Master Plan

The Balboa Park Master Plan was adopted in 1989 after 8 years of community input; the text in the currently proposed amendment is about to make drastic changes to the original plan and has not had positive public input to date.

- The adopted Balboa Park Master Plan (Figure 13) does not include a bypass at the Cabrillo Bridge but rather shows a reversible one-way route through the Plaza the Panama; which makes the Cabrillo Bridge more pedestrian and transit friendly.
- The adopted plan shows the Cabrillo Bridge carrying only eastbound traffic, freeing the westbound lane for the intra-park tram, inter-park shuttle, bicycles, and pedestrian use; the proposed amendment shows two-lane vehicular traffic through the Cabrillo Bridge.
- The adopted plan calls for the parking facility at the Palisades to be subject of an architectural design competition to ensure the widest possible search for a quality design; the amendment gives the applicant (“the Plaza de Panama Committee”) the freedom to choose the architect for the parking structure, eliminating the option for the best possible design to be integrated into the area in question.
- The adopted plan calls for automobile access from the parking structure at the Palisades to the Prado to pass under the promenade; the proposed plan eliminates this option.
- Alternative D in the 1986 and 1987 EIR is the environmentally preferred Alternative as shown in Figures 28 and 34. This closes the Cabrillo Bridge to vehicular traffic and it uses Quince Street as its main vehicular access from the west. Not adequately studied or addressed in this EIR

Balboa Park Central Mesa Precise Plan:

S-75

A

B

C

D

- The Balboa Park Central Mesa Precise Plan was adopted in 1992 after 3 years of community input; the text in the proposed amendment is about to make drastic changes to the original plan and has not had positive public input to date.
- The Balboa Park Central Mesa Precise Plan does not include a bypass at the Cabrillo Bridge, but rather details a reversible one-way route through the Plaza de Panama which removes most of the vehicular traffic from the Plaza de Panama without construction of the bypass, making the Cabrillo Bridge more pedestrian and transit friendly.
- The 2-way bypass road in the proposed amendment does not separate vehicles and parking from pedestrian corridors, since pedestrians will tend to use the same road, and the narrow cross section with two 13’ vehicular travel lanes will create traffic jams when a vehicle gets a flat tire or ceases to operate because no shoulders are provided.
- The proposed project reconfigures the Alcazar Garden Parking Lot, creating a LOT of conflicts between pedestrians and vehicles, because it provides handicapped parking/accessible parking, valet drop-off, and bus drop-off all at the same location as the main vehicular entrance to the park, directly conflicting with vehicular traffic that is passing by in order to get to the parking structure.

S-75

A

B

C

D

E

Comment noted.

Comment noted.

Comment noted.

Comment noted.

See response to comment S-74(e).

LETTER

RESPONSE

- Alternative D in the 1986 and 1987 EIR is the environmentally preferred Alternative as shown in Figures 28 and 34. This closes the Cabrillo Bridge to vehicular traffic and it uses Quince Street as its main vehicular access from the west. Not adequately studied or addressed in this EIR

S-76 *Grading Plan and Landscape Plan; specific concerns:*

- A
 - The amount of dirt that will be exported from the site should be reduced. The project proposes 159,000 cubic yards of cut; 33,000 cubic yards of fill, and 126,000 cubic yards of export. At approximately 10 cubic yards per truck, approximately 12,600 truckloads of earth are proposed to be moved elsewhere.
- B
 - The proposed project should eliminate or reduce the height of the retaining walls shown for the unsafely curving road, which is currently 15 feet to 20 feet tall in the vicinity of the organ pavilion, including eliminating or reducing the very deep excavation for construction of the road, and eliminating or reducing the slopes and drops involved that would otherwise create a hazard.
- C
 - The plans & renderings for the proposed project should clearly show safety railings where required for the steep slopes to be created. They do not. Inadequate public information
- D
 - The proposed project should analyze the loading zone in the Alcazar Garden Parking Lot for eastbound traffic, which currently is not long enough for 2 buses.
- E
 - The proposed project should better analyze the conflicts with pedestrian and vehicular interference, due to the fact that pedestrians must cross the flow-through traffic to get from ADA (American Disabilities Act) cars to the access ramps.
- F
 - The proposed project should better analyze ADA accessibility conflicts with flow-through traffic.
- G
 - The proposed project should analyze the roadway exiting the Alcazar Gardens leading into the new parking structure where the curve in the road has a radius of 102', which is a steep turning radius and would not be permitted on a public street.
- H
 - The proposed project should better analyze the curve in the roadway on the northeast side of the new parking structure, which has a radius of 83' and is a sharp radius that would not be permitted on a public street.
- I
 - The proposed project should better analyze the 90-degree turn from the Cabrillo Bridge onto the Bypass, which is not an improvement over the current route through the park and under City guidelines would require a stop sign.
- J
 - The proposed project should better analyze the 90-degree turn from the Cabrillo Bridge onto the Bypass that creates pedestrian-vehicle conflicts
 - The proposed project should better analyze pedestrian traffic for the Bypass, because there is sidewalk proposed on both sides of the Bypass and pedestrians will tend to use the same road as vehicles.
 - The proposed project should better analyze likely traffic jams into the park because the cross section shows two 13' vehicular travel lanes and traffic jams can be created when a vehicle gets a flat tire or ceases to operate because no shoulders are provided.
 - The proposed project should better analyze the impacts of concentrating all vehicle pedestrian conflicts within the Alcazar Garden parking lot, instead of the existing very diffused (and therefore less impactful) conflicts along the existing route. With all pedestrian pick-ups and drop-offs located in the Alcazar lot, all these interactions are concentrated and likely to impede smooth traffic flow and result in accidents to pedestrians. In the current circulation, pedestrians can be picked up and dropped off in myriad places along the route, diffusing and lessening these impacts.

S-76

- A Comment noted. The amount of soil export generated is necessitated by excavation for the subterranean parking structure and has been minimized to the extent possible. The proposed export site is the Arizona Street Landfill, which could receive the project export without resulting in any unmitigated significant impacts.
- B Comment noted. The heights of the proposed walls have been reduced to maximum extent possible, and the walls supporting the roadway as it approaches the pedestrian overpass would be tiered to reduce visual impacts. Wall locations, height and wall finishes are shown on Sheet 24 of the Site Development Permit Plans and Figures 4.3-28 and Figure 4.3-29 of the EIR.
- C Comment noted. Location and type of safety hand rails and guardrails, where required, are shown on the Site Development Permit Plans, sheet 25.
- D The proposed use of the loading zone would accommodate large freight deliveries for off-peak deliveries, similar to how large deliveries are accommodated today. Deliveries would be managed and coordinated similar to today. The loading zone is not proposed for buses.
- E ADA parking is primarily planned for the Alcazar parking lot. As discussed in Section 4.4.3.1a, the existing pedestrian/vehicular conflicts within the Alcazar parking lot would be reduced by providing designated raised pedestrian crossings and a designated pick-up/drop-off lane (see Figures 3-18 and 3-21).
- F See response to comment K-34. The proposed design incorporates raised, table top cross walks, illuminated and advanced pedestrian crosswalk warnings, giving pedestrians' priority.
- G-J The proposed roads are park roads with a design speed of 15 mph. The proposed roads would be two 14-foot travel lanes and deviations from the commercial street section have been reviewed and approved by the City Development Services Department.

LETTER

RESPONSE

- Alternative D in the 1986 and 1987 EIR is the environmentally preferred Alternative as shown in Figures 28 and 34. This closes the Cabrillo Bridge to vehicular traffic and it uses Quince Street as its main vehicular access from the west. Not adequately studied or addressed in this EIR

S-76 *Grading Plan and Landscape Plan; specific concerns:*

- The amount of dirt that will be exported from the site should be reduced. The project proposes 159,000 cubic yards of cut; 33,000 cubic yards of fill, and 126,000 cubic yards of export. At approximately 10 cubic yards per truck, approximately 12,600 truckloads of earth are proposed to be moved elsewhere.
- The proposed project should eliminate or reduce the height of the retaining walls shown for the unsafely curving road, which is currently 15 feet to 20 feet tall in the vicinity of the organ pavilion, including eliminating or reducing the very deep excavation for construction of the road, and eliminating or reducing the slopes and drops involved that would otherwise create a hazard.
- The plans & renderings for the proposed project should clearly show safety railings where required for the steep slopes to be created. They do not. Inadequate public information
- The proposed project should analyze the loading zone in the Alcazar Garden Parking Lot for eastbound traffic, which currently is not long enough for 2 buses.
- The proposed project should better analyze the conflicts with pedestrian and vehicular interference, due to the fact that pedestrians must cross the flow-through traffic to get from ADA (American Disabilities Act) cars to the access ramps.
- The proposed project should better analyze ADA accessibility conflicts with flow-through traffic.
- The proposed project should analyze the roadway exiting the Alcazar Gardens leading into the new parking structure where the curve in the road has a radius of 102', which is a steep turning radius and would not be permitted on a public street.
- The proposed project should better analyze the curve in the roadway on the northeast side of the new parking structure, which has a radius of 83' and is a sharp radius that would not be permitted on a public street.
- The proposed project should better analyze the 90-degree turn from the Cabrillo Bridge onto the Bypass, which is not an improvement over the current route through the park and under City guidelines would require a stop sign.
- The proposed project should better analyze the 90-degree turn from the Cabrillo Bridge onto the Bypass that creates pedestrian-vehicle conflicts
- The proposed project should better analyze pedestrian traffic for the Bypass, because there is sidewalk proposed on both sides of the Bypass and pedestrians will tend to use the same road as vehicles.
- The proposed project should better analyze likely traffic jams into the park because the cross section shows two 13' vehicular travel lanes and traffic jams can be created when a vehicle gets a flat tire or ceases to operate because no shoulders are provided.
- The proposed project should better analyze the impacts of concentrating all vehicle pedestrian conflicts within the Alcazar Garden parking lot, instead of the existing very diffused (and therefore less impactful) conflicts along the existing route. With all pedestrian pick-ups and drop-offs located in the Alcazar lot, all these interactions are concentrated and likely to impede smooth traffic flow and result in accidents to pedestrians. In the current circulation, pedestrians can be picked up and dropped off in myriad places along the route, diffusing and lessening these impacts.

K

L

M

S-76

K

Comment noted. The proposed Centennial Road (Bypass) would not include sidewalks on either side of the road. The project separates pedestrian circulation from the Centennial Road vehicular circulation.

L

The project would provide 14-foot travel lanes similar to the existing Cabrillo Bridge and Pan American Road within the Park where both provide 12-foot roadways with no shoulders. The proposed Cabrillo/Centennial Bridge intersection would be a two-way stop sign controlled intersection, per design and standards. The turning movement would operate at an acceptable level of service. No traffic jams are anticipated to occur.

M

See response to comment K-34. The proposed reconfigured Alcazar parking lot would be a designated valet operation area south and southeast of the lot which is separated from the through traffic on Centennial Road. The passenger drop-off/pick-up area would also be in its own designated space north of the lot, away from through traffic where the passengers never encounter the through traffic on Centennial Road. The only pedestrians crossing the road from Alcazar parking lot would be those who park at the ADA parking, tram passengers and those who drop-off/pick-up at valet, a combined estimate of 230 pedestrians compared to the existing configuration which could result in a combined estimate of 780 pedestrians crossing at the Plaza during a peak hour on a typical Saturday.

LETTER

RESPONSE

- S-77 The following categories were tabulated with specific areas of concern:
- A • Vehicular Traffic: Goal should not be bringing traffic into the core of the park, but rather minimizing or eliminating it.
 - B • Bypass Bridge: The Bypass Bridge does not comply with accepted guidelines for treatment of historical resources.
 - C • Fees: The Introduction of Fees brings land use issues, has impacts in areas outside the park as well as inside the park
 - D • Net gain of parking spaces: If more parking is needed, the net gain from this proposal does not increase it by much
 - E • Funding: There is no guarantee that there is adequate funding; there is no guarantee that parking structure occupancy will support the level of funding needed to service bonds; there is no guarantee that funds can be raised by the Plaza de Panama Committee as promised;
 - F • Private influence in public property: The inordinate influence of moneyed interests on public parklands with this proposal raises the issue of conflict of interest
 - G • Legal challenge: The recent MOU entered into by the City with the Plaza de Panama committee is currently under legal challenge. There will likely be further legal challenges to this project due to its impact on significant historic resources, resulting in growing legal expenditures for the City.
 - H • Previous planning efforts: This proposal disregards all the past years of planning efforts and public input.
 - I • Public Transit: The proposal does not bring transit into the park and would not alleviate increase of vehicular traffic. Lack of compliance with the SANDAG 2050 Regional Transportation Plan

S-77

- A See response to comment S-8.
- B See response to comment S-53.
- C See response to comment R-22.
- D As indicated in Section 4.4.4, the project would have a less than significant impact on parking. The Parking Demand Study (see Appendix D-2) found the proposed parking spaces to be adequate to meet the parking demand.
- E See response to comment R-22.
- F Comment noted.
- G See response to comment R-3.
- H Comment noted.
- I See response to comment N-4.



Letter T

E. Shearer-Nguyen
 Environmental Planner City of San Diego
 Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

March 20, 2012

Dear City Staff and Decision Makers:

T-1 The Plumbing Heating Cooling Contractors Association of San Diego is a non-profit industry organization focused on ethics and best practices for our industry including promoting water conservation.

T-2 The Draft Environmental Impact Report for the Balboa Park Plaza de Panama Project dated January 23, 2012 does not provide an adequate analysis of the water supply uses or analysis for alternative projects and only states that this is not required.

Last year, the City of San Diego ran a public relations campaign promoting citizens to reduce their water consumption patterns by 20%. While the city has stopped that campaign, the projections for growth in our region certainly show that without conservation measures in place there will be a strain on our water supply in the years ahead. This is an issue for our region especially because we rely upon water resources from other regions.

T-3 The City of San Diego and PHCC have fundamental roles in promoting projects that are environmentally responsible in terms of how we utilize the water supply. The data in the draft EIR for this project shows that there is a projected threefold increase in the amount of landscape water that would be used for the proposed project. The report concludes that this does not meet the threshold for further analysis. However the additional amount of water used for landscaping is projected to be over 1.9 million gallons per year and instead of reducing the water supply in the park through better management and xeroscape landscapes the projections show that water supply is going to increase. The report does not provide any analysis of water use to accommodate the increases of public spaces in the park plaza; these figures were left out of the report all together.

T-4 Therefore, for these reasons we request that further analysis is conducted to consider the entire scope of water supply resources for this project and to provide the analysis comparing this project to the alternatives projects in terms of water supply. We believe that the draft EIR as presented does not provide sufficient information to guide the public or decision makers with alternatives and that by not providing any analysis the EIR is insensitive to our regions limited water resources.

This letter was approved by the Board of Directors of PHCC on March 20, 2012.

Sincerely,

Danielle Dorsey
 Executive Director, PHCC - SD

Drafted by:
 Janet O'Dea, Powers Plumbing
 1705 W. Lewis St.
 San Diego, CA 92103
 619-295-2115
 janet@bestsandiegoplumber.com

PHCC - SD | 7884 Conroy Court | San Diego | CA | 92111 | danielle@phccsd.org

T-1 Comment noted.

T-2 Comment noted. See response to comment T-3, below.

T-3 The applicant completed a Water Demand Analysis to project the increase in irrigation usage and to determine if a Water Supply Assessment (WSA) would be triggered by adopted City policies and thresholds. Toilets and other features will be per City Parks and Recreation Design Guidelines. The increase in water usage did not trigger a WSA.

The increase in water usage for public spaces and plaza is not anticipated to be a significant impact on the existing water supply. Two existing restrooms would be relocated on-site, with similar water usage. The proposed Visitors Center would not have any food serving/water demand, and the proposed two-stall restroom in the maintenance building would not exceed the WSA.

T-4 See response to comment T-3.



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Ms. E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Letter U

San Diego, March 23, 2012

Dear Ms. Shearer-Nguyen,

U-1

I am taking this opportunity, on behalf of the Reuben H. Fleet Science Center and the Balboa Park Cultural Partnership to indicate our strong support of the Environmental Impact Report for the Plaza de Panama Project. The impacts during construction phase have been extremely well identified and mitigated to such a degree that it is very possible we may be able to solve a current problem, i.e., lack of an efficient way to take better advantage of available parking spaces for visitors to Balboa Park's Cultural Core, the Central Mesa.

The plan is to provide a shuttle system that will carry employees and Park visitors from outer parking lots into the Prado and it's the institutions that surround the Plaza de Panama and the Plaza de California. With approximately a year long period of activity this will also provide the means to evaluating how we can best provide for future visitors who will be dependent on private automobiles to visit the Park without having to park there. The peripheral lots can still be served by the same system that will be thoroughly evaluated during the proposed mitigation project. We believe this same system could be adapted to provide peripheral parking for employees and visitors in designated areas once the construction program is completed.

In addition the experience in encouraging attendees and staffs at San Diego High School, San Diego City College, and the United States Naval Hospital to park in new areas provided by the schools and Hospital, thereby making it possible to have empty lots in the central core at the beginning of the visitor hours at the institutions. These lots are presently from half to three quarters full at the present time. Furthermore, the 2015 Centennial Celebration which is scheduled to begin January 1, 2015, will provide a year to perfect such a system as a major legacy to improve public access to the Park's cultural institutions.

U-1 Comment noted.

LETTER

RESPONSE

I congratulate the Sponsors and Designers of the plan to reclaim the Plaza de Panama and the Plaza de California for creating such an ambitious innovative plan that will have such long lasting benefits to our City.

Sincerely,



Jeffrey W. Kirsch, Ph. D.
Executive Director

- cc. Mayor Jerry Sanders
- cc. Sherri Lightner
- cc. Kevin Faulconer
- cc. Todd Gloria
- cc. Anthony Young
- cc. Carl DeMaio
- cc. Lori Zapf
- cc. Marti Emerald
- cc. David Alvarez
- cc. Plaza de Panama Committee

Letter V

California's "Official Air & Space Museum and Education Center"



March 14, 2012

Elizabeth Shearer-Nguyen
City of San Diego Development Services Dept.
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Shearer-Nguyen:

V-1

I am writing on behalf of the San Diego Air & Space Museum Board of Directors, staff and volunteers to offer comment to the Draft Environmental Impact Report (EIR) for the Plaza de Panama project. Our institution offers unqualified support for this visionary project to revitalize Balboa Park and improve visitor access to this important San Diego asset.

The project provides both an aesthetic and functional improvement to Balboa Park. The design for park space has been respectful of the Park's rich past and in fact brings back a number of historical elements through both restoration and rehabilitation. As was the case with the reclamation of the East El Prado from cars to a pedestrian area, the reclamation of the Plaza de California, West El Prado, Plaza de Panama, Esplanade and Organ Pavilion parking lot will beautify the park and reactivate its public spaces with pedestrians, making the park itself as much of an attraction as the institutions that reside here.

The Plaza de Panama project also improves the function of the park. Most importantly, it maintains vehicle access from the west side over the Cabrillo Bridge. Today, most people arrive to Balboa Park by car. Half of these people come from the west side. It simply won't work in today's environment to cut off an access used by almost half of the park's visitors. We certainly support increased transit access to the park, but the level of transit service planned for the park is not nearly sufficient to accommodate the 12 million visitors the park sees every year. The Centennial Bridge/Road system still allows us to accommodate vehicle traffic, but it provides a much more direct route to the parking areas in the park. With Balboa Park suffering from parking shortages on a regular basis, the additional 300 spaces provided in the parking structure will help us begin to meet parking demand.

With the impending 2015 Centennial Celebration, implementation of the Plaza de Panama project becomes even more important. 2015 will see events and celebrations planned in the park throughout the year. Many of the plazas (that are now existing parking lots) will be used as event venues and will not be available for parking. With the Plaza de Panama project in place, these plazas will be available for event space, the new parking structure will ensure that parking is available, and vehicle access can continue to and through the park without placing an undue impact on the communities surrounding the park.

We appreciate the leadership of the Plaza de Panama Committee in proposing this project for the park. Thank you for the opportunity to add our comments to the Draft EIR.

Best regards,


James G. Kidrick
President and Chief Executive Officer



Accredited by the American Association of Museums (AAM)

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V-1

Comment noted.

Letter W



March 6, 2012

Elizabeth Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Shearer-Nguyen,

W-1 Please accept this letter expressing my full support for the Plaza de Panama project. As Balboa Park is one of the most treasured and coveted attractions in our destination, I am in full support of the proposed improvements and enhancements to the benefit of our visitors.

Improving the traffic and infrastructure of Balboa Park is vital to growing San Diego's tourism industry. With nearly 12 million people visiting the park each year, vehicular accessibility into the park and controlling the traffic flow within the park will greatly mitigate traffic congestion, reduce danger for pedestrians, and enhance the overall visitor experience as a whole.

We at the San Diego Convention & Visitors Bureau are acutely aware of the importance of Balboa Park, and the impact it has on San Diego's tourism industry. We support the Plaza de Panama project and feel that the findings presented by alternative studies do not sufficiently address the issues at hand. While reclaiming park space for pedestrians and maintaining convenient access to the park is a challenge, I believe that the Panama plan presents a comprehensive solution to problems that will continue to degrade user experience, if they are not addressed correctly.

Investing in the improvements to Balboa Park, as proposed by the Plaza de Panama project, is vital to the future of San Diego's tourism industry. As we approach the Centennial Celebration of the Park, we are encouraged and hopeful that the Panama Plan will gain support and approval, so that Park visitors will enjoy the cultural heritage, enrichment and beauty that the Park offers for another 100 years.

Best regards,


Joe Terzi
President & CEO



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San Diego / CA 92101 FAX 619.696.9371

W-1 Comment noted.

Letter X

From: [Chena Popper](#) on behalf of [Michael W. Hager](#)
To: [DSD_EAS](#)
Cc: [Lighthouse](#), [Councilmember Sherri Faulconer](#), [Council Member Kevin](#), [Councilmember Todd Gloria](#), [Youna Anthony](#), [DeMaio](#), [Councilmember Carl Zapp](#), [Council Member Lorise Emerald](#), [Councilmember Marti Alvarez](#), [Council Member David](#); info@plazadepanama.org
Date: Thursday, March 01, 2012 3:37:54 PM
Attachments: [ima0e0011.doc](#)

March 1, 2012

E. Shearer-Nguyen, Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

Dear E. Shearer-Nguyen,

X-1

I am writing to you concerning the Plaza de Panama EIR on behalf of the San Diego Natural History Museum. In doing so, I am expressing the view of the majority of the 30 members of our Board of Directors, 120 staff members, and our Museum membership of approximately 8000.

The Natural History Museum is located on the East Prado which has been closed to automobile traffic since the 1970's. The pedestrian plaza around the Bea Evenson Fountain is always filled with children, families and park visitors enjoying the Park without automobile traffic. It would be unthinkable to return it to automobile use, as it was prior to the 70's, and like the West Prado is today.

Our Museum has followed the Plaza de Panama project from the beginning because of the positive visitor experience that will be possible with the removal of cars from the cultural core of the Park. We have studied the various alternatives and believe that closure of the Cabrillo Bridge would be extremely harmful to the cultural institutions that rely on visitors to stay in business and it would be detrimental to the nearly 50% of visitors that enter the Park from the west. We also believe closure of the Cabrillo Bridge would adversely impact businesses and residents on the west side who are already impacted with traffic and parking.

The alternative that allows cars on the West Prado and through the corner of the Plaza de Panama is also not acceptable to us because it would not allow full pedestrian use of the Plaza de California, the West Prado and a portion of the Plaza de Panama. It will also lead to more congestion as cars and people attempt to use the same space. The East Prado, which we currently enjoy free of cars, should be the model for the West Prado as well.

The Plaza da Panama project, as proposed, would restore 6.3 acres to pedestrian use and greatly improve visitor experience in Balboa Park. It provides the opportunity to restore the historic fabric to the Park but also maintains access from both sides of the park and increases parking. This balance is critical to the continued success of the 26 cultural institutions in Balboa Park.

Balboa Park is also a place of community use for large events such as December Nights and we

X-1

Comment noted.

LETTER

RESPONSE

anticipate huge crowds for the 2015 Centennial Celebration. The cultural core of Balboa Park needs more space for people and less automobile traffic. That will be accomplished by the Plaza de Panama project as proposed.

The San Diego Natural History Museum strongly supports the Plaza de Panama project and finds all other alternatives inadequate.

Thank you for this opportunity to express our concerns.

Sincerely,



Michael W. Hager, Ph.D.
President & CEO
San Diego Natural History Museum
Now open for the first time in San Diego: [Titanic: The Artifact Exhibition!](#)

Phone: 619.255.0216
Fax: 619.232.0248
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Mailing address: PO Box 121390, San Diego, CA 92112-1390
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 Please consider the impact on the environment before printing this message.

Letter Y



Save Our Heritage Organisation
Saving San Diego's Past for the Future

March 22, 2012

Elizabeth Shearer-Nguyen
 Environmental Planner
 City of San Diego Development Services Center
 via email: DSDEAS@sanidiego.gov

Subject: Comments on Draft EIR
 Balboa Park Plaza de Panama Project

Dear Ms. Shearer-Nguyen:

Y-1 Please accept these comments submitted on behalf of the thousands of members and supporters of Save Our Heritage Organization (SOHO) regarding the Plaza de Panama Project Draft EIR, and respond to each comment individually. SOHO is a California nonprofit corporation formed in 1969 to lead the San Diego community as a catalyst for historic preservation by raising awareness and appreciation of the region's rich architectural and cultural heritage.

Y-2 *1. Narrow Project Objective.* The initial impetus for the Plaza de Panama project was to remove parking from the Plaza de Panama, as long-desired and long-planned by the City and as reflected in its prior comprehensive planning documents. Does not the add-on project objective suggested by the Plaza de Panama Committee to remove all traffic from the Plaza de Panama, which was not a part of the fundamental project vision, create an improperly narrow objective that restricts the fair analysis of alternatives? (*City of Santee v. County of San Diego; In Re Bay Delta.*)

Y-3 *2. Analysis of Impacts.* The Draft EIR inadequately analyzes impacts:

- The proposed project site is within the boundaries of a National Historic Landmark District (NHLHD). The nature and extent of the project's unmitigable impacts to NHLHD integrity have an inadequate baseline and have been segmented in a way that avoids assessment of cumulative impacts to the NHLHD as a whole. Please revise the EIR to provide integrated analysis of the impacts of the project and each alternative to the NHLHD as a whole, or explain why this is not necessary to comply with CEQA.

Y-4 • The EIR fails to analyze or acknowledge many impacts relating to the visual and physical intrusions of the project's new massive modern infrastructure and altered

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Y-1 Comment noted.

Y-2 Section 3.1 provides a statement of objectives sought by the applicant for the project. Taken together, these objectives serve to meet the underlying purpose of the project to restore pedestrian and park uses to the Central Mesa and alleviate pedestrian/vehicular conflicts.

Y-3 Section 4.2.2.1b provides a comprehensive analysis if the project's impacts to the entirety of the NHLHD, including a breakdown of each contributing feature. This does not constitute segmenting, but rather provides an overview of the structural contents of the NHLHD. The EIR concludes that impacts the project would result in significant and unmitigated impacts to on the Balboa Park NHLHD.

Y-4 See response to comment Y-3.

LETTER

RESPONSE

SOHO EIR Comment Letter
 March 22, 2012
 Page 2 of 6

landforms. The EIR provides inadequate analysis and no factual justification for its conclusions that project impacts to the historic setting, historic views, spatial relationships, and to the feeling, association, and materials of the NHL are less than significant. The EIR should be revised to adequately assess impacts relating to each of the following: the proposed bypass bridge, regrading of the Plaza de Panama, mall, and Alcazar Garden parking lot, the organ pavilion parking structure, the road area between the Houses of Pacific Relations, the addition of the bypass road, modern paving materials, plant materials, retaining walls, guard rails, railings, barriers, new structures, and the introduction of modern elements and water features wholly unlike and not compatible with the historic appearance of the NHL.

- Y-5 • The EIR should be revised to acknowledge, analyze, and mitigate the proposed project's intrusive new construction that would alter the character-defining features of the cultural landscape to a degree that would render the landscape unrecognizable as the setting for the 1915 and 1935 expositions. If not, why not?
- Y-6 • The EIR should be revised to acknowledge that the project's proposed changes to the NHL are not consistent with its period of significance, were not contemplated by the park's original designers, are not compatible with the original design and would result in adverse unmitigable impacts.
- Y-7 • Please revise the EIR to correct the project's inappropriate reliance on screening adverse impacts with non-historic ephemeral trees and vegetation. Plants and trees are not permanent fixtures in the historic environment.
- Y-8 • None of the proposed project's components contribute to restoration of elements or materials present during the park's period of historic significance and therefore do not mitigate impacts. The sole exception is some lampposts, which are nonetheless inaccurate in terms of materials and some locations, creating a false sense of history.
- Y-9 • This project does not meet Secretary of the Interior's Standards for Rehabilitation. Conclusions in the Draft EIR to the contrary are wrong and must be corrected and impacts correctly acknowledged as unmitigable.

 • The EIR should be revised to acknowledge that the Secretary's Standards for Restoration and Preservation, not Rehabilitation, are appropriate for this project within the NHL. Please revise the Draft EIR to analyze project impacts pursuant to the Standards for Restoration and Preservation and include the following explanation:

Secretary of the Interior Standards for the Treatment of Historic Properties

Four Treatment Approaches

There are Standards for four distinct, but interrelated approaches to the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction.

- Y-5 See response to comment Y-3.
- Y-6 The period of significance is related to restoration projects, but is not a requirement for the proposed rehabilitation. Following the Park's original design is not a requirement for work in Balboa Park. Except where acknowledged in the EIR, the project would be compatible with the Standards.
- Y-7 The design of the Centennial Bridge would preserve as many of the existing trees as possible. For example, Figure 3-15 shows partial screening of the bridge in the proposed condition, but this rendering conservatively shows only one (out of fourteen total) of the trees proposed in the landscaping plan (shown in Figure 3-37) along the western portion of the Centennial Bridge. With regard to the permanence of the tree canopy and screening, the selected species have been vetted and will be approved by City staff who have an ongoing program of tree renewal within the Park in order to ensure the future of the next generation of trees within the Park.
- Y-8 Other restored items include the reintroduction of curbs and lawns around the Plaza de Panama, the main portion of the steps in front of the Museum of Art, the configuration of the Esplanade and West El Prado, and the recreation of the tree boxes in the Plaza de California. The 1915 lampposts were temporary and made out of painted cast-plaster. For this reason, none of the original fixtures survived. The recreated lampposts would be painted cast aluminum. Per the SOI Standards, latitude is given in the Standards for Rehabilitation to replace extensively deteriorated, damaged, or missing features using either traditional or substitute materials. Regarding the lamppost locations; they would be in areas that had lampposts in 1915. The spacing would be slightly adjusted to accommodate new trees, and previously changed building and walkway layouts.
- Y-9 The SOI Rehabilitation Standards are listed in Section 4.2.1.2.d. For each of the six major components of the project, Section 4.2.2.1.b, provides an evaluation of the project's compliance with individual SOI Rehabilitation Standards.

SOHO EIR Comment Letter
 March 22, 2012
 Page 2 of 6

landforms. The EIR provides inadequate analysis and no factual justification for its conclusions that project impacts to the historic setting, historic views, spatial relationships, and to the feeling, association, and materials of the NHLD are less than significant. The EIR should be revised to adequately assess impacts relating to each of the following: the proposed bypass bridge, regrading of the Plaza de Panama, mall, and Alcazar Garden parking lot, the organ pavilion parking structure, the road area between the Houses of Pacific Relations, the addition of the bypass road, modern paving materials, plant materials, retaining walls, guard rails, railings, barriers, new structures, and the introduction of modern elements and water features wholly unlike and not compatible with the historic appearance of the NHLD.

- The EIR should be revised to acknowledge, analyze, and mitigate the proposed project's intrusive new construction that would alter the character-defining features of the cultural landscape to a degree that would render the landscape unrecognizable as the setting for the 1915 and 1935 expositions. If not, why not?
- The EIR should be revised to acknowledge that the project's proposed changes to the NHLD are not consistent with its period of significance, were not contemplated by the park's original designers, are not compatible with the original design and would result in adverse unmitigable impacts.
- Please revise the EIR to correct the project's inappropriate reliance on screening adverse impacts with non-historic ephemeral trees and vegetation. Plants and trees are not permanent fixtures in the historic environment.
- None of the proposed project's components contribute to restoration of elements or materials present during the park's period of historic significance and therefore do not mitigate impacts. The sole exception is some lampposts, which are nonetheless inaccurate in terms of materials and some locations, creating a false sense of history.
- This project does not meet Secretary of the *Interior's Standards for Rehabilitation*. Conclusions in the Draft EIR to the contrary are wrong and must be corrected and impacts correctly acknowledged as unmitigable.
- The EIR should be revised to acknowledge that the *Secretary's Standards for Restoration and Preservation*, not *Rehabilitation*, are appropriate for this project within the NHLD. Please revise the Draft EIR to analyze project impacts pursuant to the *Standards for Restoration and Preservation* and include the following explanation:

Secretary of the Interior Standards for the Treatment of Historic Properties

Four Treatment Approaches

There are Standards for four distinct, but interrelated approaches to the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction.

- Y-10 There are no requirements to exclusively follow the SOI Rehabilitation Standards for Restoration or Preservation per the Balboa Park Master Plan, Central Mesa Precise Plan, or the City's historic guidelines.

Other than Centennial Bridge and aspects of Centennial Road, the project would fully comply with the SOI Rehabilitation Standards. Rehabilitation is an accepted treatment for historical resources in Balboa Park and has been used, along with Reconstruction, on many approved projects in the Park.

SOHO EIR Comment Letter
 March 22, 2012
 Page 3 of 6

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization have now been consolidated under this treatment.)
- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

The guidelines from the National Park Service for selecting the appropriate Standards state, "Choosing an appropriate treatment for a historic building or landscape, whether preservation, rehabilitation, restoration, or reconstruction, is critical." The questions that follow pertain specifically to historic buildings, but the process of decision-making would be similar for other property types

- Relative importance in history.
- Is the building a nationally significant resource?
- A rare survivor or the work of a master architect or craftsman?
- Did an important event take place in it?

National Historic Landmarks, or many buildings individually listed in the National Register warrant Preservation or Restoration.

Buildings that contribute to the significance of a historic district but are not individually listed in the National Register more frequently undergo Rehabilitation for a compatible new use.

- Additional analysis of the following impacts should be provided:
 - Removal of historic hardscapes
 - The addition of extensive non-historic hardscapes and curbing
 - Removal of historic and potentially historic plants and trees
 - Extensive new landscaping with non-historic plantings
 - The reintroduction of the lawns in the Plaza de Panama in a non-historic configuration
 - Changes to the rim and slopes of Palm Canyon
 - Radical changes to the historic landforms
- The EIR should be revised to consider impacts relating to the project's likely disturbance of archaeological remains from both expositions as evidenced by above-ground remains in many locations. A comprehensive survey and research relating to buried historical resources has not been completed, the required research design has not been contemplated, and required field testing has not been conducted to serve as a basis for modification that might be required of the research design based on that testing. Please address each one of the archaeological impacts and concerns enumerated below:

LETTER

RESPONSE

SOHO EIR Comment Letter
 March 22, 2012
 Page 4 of 6

Y-11

A
 B
 C
 D

1. A plan to fully excavate and document these resources must be implemented.
2. Once this is completed the project must be redesigned to avoid archaeological resources so as not to preclude the eventual reconstruction of historic features and buildings.
3. The EIR should acknowledge that the proposed project is in direct conflict with archaeological goals and removes many resources. The EIR should assess the nature and magnitude of unmitigable archaeological impacts not yet addressed in the EIR, and cannot rely upon mitigation monitoring to reduce impacts to a level of insignificance.
4. The archaeological program outlined in the EIR for this project is contrary to the procedures required by the City's General Plan.

Y-12

- The EIR should be revised to reflect the Spreckels Organ Pavilion's prominent setting and stature that would be severely diminished by the addition of a parking structure constructed level with its base. Noise impacts to the Pavilion from car alarms, screeching tires, car stereos, and traffic congestion relating to the proposed parking structure must be adequately addressed.
- The EIR is inaccurate in its insupportable contention that changes contemplated by the proposed project are not permanent and irreversible defies logic and any reasonable analysis. Please revise the EIR to acknowledge that changes are irreversible or provide fact-based analysis to support any contrary contention.
- The EIR must be revised to acknowledge that the proposed project prevents future restoration of the NHL to its period of significance. Impacts include but are not limited to the restoration or reconstruction of structures, preservation of their remains, preservation of archaeological resources, landforms, Palm Canyon, restoration of the original Cabrillo Canyon plantings and iconic character-defining viewscape, Palm Canyon bridge, pergolas, gardens, sight lines, reintroduction of historic hardscapes, landscapes, curbs, plant material, trees, lighting, materials, and access.
- The EIR must be revised to analyze the project's impacts to reduce Heritage Tourism by diminishing the park's historic features, setting, obscuring historic features and authenticity.
- The EIR must be revised to analyze the project's potential to result in the loss of the National Historic Landmark designation.
- The EIR must be revised to analyze the project's potential to result in loss of priority for grant funding for local, state, and national grants.
- The EIR must be revised to analyze the project's potential to result in loss of recreation opportunities for families and visitors due to new parking fees, since park parking has always been free. Balboa Park has always been important for San Diegans of limited means to enjoy on a regular basis.
- The EIR should address the project's economic impacts to the San Diego region by rendering one of our most iconic and beautiful areas much less desirable and less attractive.

Y-11 A

As identified in Section 4.2.1.1.b, an archaeological survey and testing program was conducted encompassing the project area in accordance with City Historic Resources Guidelines and accepted archaeological practices. . Since the presence, absence, and composition of such buried resources are unknown, a research design and testing plan cannot be developed to address unknown cultural resources. Random testing of areas that may or may not contain subsurface archaeological resources is not standard procedure in current archaeological practice. This is especially true in areas such as Balboa Park that have been subjected to extensive disturbances from successive construction projects.

B

The archeological evaluation did not identify significant archeological resources within the project APE. Therefore, redesign of the project would not be required.

C

See response to comments S-11a and S-11b.

D

The evaluations were conducted in accordance with the Historical Resources Guidelines and no significant resources were identified. Therefore, there is no conflict with the City General Plan.

Y-12

The siting of the Spreckels Organ Pavilion today does not reflect the way it was in 1915. The non-historic parking lot was excavated in the 1950s. The project would restore this area similar to the 1915 period and would not create a significant impact. The parking structure would be built underground, not level with the Organ Pavilion.

As analyzed in Section 4.12.5.1, source noise levels from vehicles on Centennial Road passing by the Organ Pavilion would be similar to existing noise levels from vehicles on the existing Pan American East Road as the project would not result in an increase in traffic. The edge of the existing Pan American Road is 100 feet from the west most seating at the Organ Pavilion. The newly constructed roadway would be 150 feet from this area. Therefore, roadway through traffic would be less than the existing condition and noise would thereby be reduced.

LETTER

RESPONSE

SOHO EIR Comment Letter
 March 22, 2012
 Page 4 of 6

1. A plan to fully excavate and document these resources must be implemented.
2. Once this is completed the project must be redesigned to avoid archaeological resources so as not to preclude the eventual reconstruction of historic features and buildings.
3. The EIR should acknowledge that the proposed project is in direct conflict with archaeological goals and removes many resources. The EIR should assess the nature and magnitude of unmitigable archaeological impacts not yet addressed in the EIR, and cannot rely upon mitigation monitoring to reduce impacts to a level of insignificance.
4. The archaeological program outlined in the EIR for this project is contrary to the procedures required by the City's General Plan.

- The EIR should be revised to reflect the Spreckels Organ Pavilion's prominent setting and stature that would be severely diminished by the addition of a parking structure constructed level with its base. Noise impacts to the Pavilion from car alarms, screeching tires, car stereos, and traffic congestion relating to the proposed parking structure must be adequately addressed.

Y-13 • The EIR is inaccurate in its insupportable contention that changes contemplated by the proposed project are not permanent and irreversible defies logic and any reasonable analysis. Please revise the EIR to acknowledge that changes are irreversible or provide fact-based analysis to support any contrary contention.

Y-14 • The EIR must be revised to acknowledge that the proposed project prevents future restoration of the NHL to its period of significance. Impacts include but are not limited to the restoration or reconstruction of structures, preservation of their remains, preservation of archaeological resources, landforms, Palm Canyon, restoration of the original Cabrillo Canyon plantings and iconic character-defining viewscape, Palm Canyon bridge, pergolas, gardens, sight lines, reintroduction of historic hardscapes, landscapes, curbs, plant material, trees, lighting, materials, and access.

Y-15 • The EIR must be revised to analyze the project's impacts to reduce Heritage Tourism by diminishing the park's historic features, setting, obscuring historic features and authenticity.

Y-16 • The EIR must be revised to analyze the project's potential to result in the loss of the National Historic Landmark designation.

- The EIR must be revised to analyze the project's potential to result in loss of priority for grant funding for local, state, and national grants.

- The EIR must be revised to analyze the project's potential to result in loss of recreation opportunities for families and visitors due to new parking fees, since park parking has always been free. Balboa Park has always been important for San Diegans of limited means to enjoy on a regular basis.

- The EIR should address the project's economic impacts to the San Diego region by rendering one of our most iconic and beautiful areas much less desirable and less attractive.

Y-13 The EIR relies upon the HRTR (see Appendix B-1) to support the conclusion that the changes proposed by the project are reversible. As discussed in the HRTR, Rehabilitation Standard 10 does not deal with cost or with degrees of feasibility in reversing an improvement, but rather is focused on minimizing harm to historic fabric. Retention of the historic fabric is what makes it possible to return a building or landscape to its original condition.

As stated in Appendix B-1, pages 149-150, although unlikely, it would be possible to remove each of the elements of the project and restore the existing conditions. In summarizing the HRTR, the proposed Centennial Bridge would be structurally and seismically separate from the Cabrillo Bridge and connected only with an expansion joint. Thus the Cabrillo Bridge's historic fabric would be intact and reversibility would require only repair of the balustrade and sidewalk. Centennial Road does not alter any historic fabric and could be reversed through removal of the asphalt and regrading the topography; activities that require no special craftsmanship.

The Organ Pavilion parking lot is not a contributing feature of the Balboa Park Historic District and does not physically touch any other historic district contributors. Therefore, there is no historic fabric being damaged and removal of the proposed Organ Pavilion parking structure would be possible; albeit expensive and impractical.

Y-14 There are no known plans to restore the historic district to its period of significance in either 1915–16 or 1935–36. To do so would require demolition of significant buildings and amenities within the Park and the reconstruction of 10–20 missing buildings. The project would not prevent future restoration of the NHL. The EIR adequately discloses the project's impacts to the NHL.

Y-15 Although Section 4.2 identifies significant and unmitigated impacts associated with the Centennial Bridge, there is no expectation of diminished tourism. No additional impacts to Park features would occur. See response to comment F-9.

Y-16 See response to comment F-9.

LETTER

RESPONSE

SOHO EIR Comment Letter
 March 22, 2012
 Page 4 of 6

1. A plan to fully excavate and document these resources must be implemented.
 2. Once this is completed the project must be redesigned to avoid archaeological resources so as not to preclude the eventual reconstruction of historic features and buildings.
 3. The EIR should acknowledge that the proposed project is in direct conflict will archaeological goals and removes many resources. The EIR should assess the nature and magnitude of unmitigable archaeological impacts not yet addressed in the EIR, and cannot rely upon mitigation monitoring to reduce impacts to a level of insignificance.
 4. The archaeological program outlined in the EIR for this project is contrary to the procedures required by the City's General Plan.
- The EIR should be revised to reflect the Spreckels Organ Pavilion's prominent setting and stature that would be severely diminished by the addition of a parking structure constructed level with its base. Noise impacts to the Pavilion from car alarms, screeching tires, car stereos, and traffic congestion relating to the proposed parking structure must be adequately addressed.
 - The EIR is inaccurate in its insupportable contention that changes contemplated by the proposed project are not permanent and irreversible defies logic and any reasonable analysis. Please revise the EIR to acknowledge that changes are irreversible or provide fact-based analysis to support any contrary contention.
 - The EIR must be revised to acknowledge that the proposed project prevents future restoration of the NHL to its period of significance. Impacts include but are not limited to the restoration or reconstruction of structures, preservation of their remains, preservation of archaeological resources, landforms, Palm Canyon, restoration of the original Cabrillo Canyon plantings and iconic character-defining viewscape, Palm Canyon bridge, pergolas, gardens, sight lines, reintroduction of historic hardscapes, landscapes, curbs, plant material, trees, lighting, materials, and access.
 - The EIR must be revised to analyze the project's impacts to reduce Heritage Tourism by diminishing the park's historic features, setting, obscuring historic features and authenticity.
 - The EIR must be revised to analyze the project's potential to result in the loss of the National Historic Landmark designation.

Y-17 • The EIR must be revised to analyze the project's potential to result in loss of priority for grant funding for local, state, and national grants.

Y-18 • The EIR must be revised to analyze the project's potential to result in loss of recreation opportunities for families and visitors due to new parking fees, since park parking has always been free. Balboa Park has always been important for San Diegans of limited means to enjoy on a regular basis.

Y-19 • The EIR should address the project's economic impacts to the San Diego region by rendering one of our most iconic and beautiful areas much less desirable and less attractive.

Y-17 Please see response to comment F-9. Additionally, as discussed in the HRTR, the Park is not in danger of losing its National Historic Landmark designation; it would also not be at risk of losing priority for grant funding.

Y-18 See response to comment S-63.

Y-19 Comment noted.

LETTER

RESPONSE

SOHO EIR Comment Letter
 March 22, 2012
 Page 5 of 6

- Y-20 • The EIR should address impacts relating to the project's restriction of residents' and visitors' enjoyment of driving through the great arch into the heart of the historic park. Described by many as one of the greatest experiences that the region has to offer or "An experience that rivals the best of Europe." This method of visiting the historic core should be acknowledged as one of the major attractions in the San Diego region.
- Y-21 • The Archery Range is arguably historic and needs to be evaluated as a historic resource impacted by the proposed project.
- Y-22 • The project's impacts should be assessed relating to the bypass road grading and other land form changes to the site of the Kern and Tulare building along the Mall, to the site of the San Joaquin building, and to the site of the Alameda and Santa Clara building.
- Y-23 • The EIR inaccurately analyses effects and limitations on pedestrian access by extreme lengthening of the new Palm Canyon bridge, and should provide additional fact-based assessment.
- Y-24 • The EIR should include supplemental analysis of the effect on restricting pedestrian access from the Palisades to the Plaza de Panama during large events such as December Nights or Earth Day by the imposition of the Bypass road ditch, retaining walls, railing systems.
- Y-25 • The radius of the curves on the bypass road should be acknowledged both as currently substandard and illegal for any roadway including park roads and inadequate as a proposed major trans-park thoroughfare.
- Y-26 • The EIR should analyze traffic that would result from closing the Cabrillo Bridge, which SOHO believes will not increase in the Uptown area as stated in the EIR. Further analysis should address traffic routed up Park Boulevard from I-5, as it is most likely to occur.
- Y-27 • The EIR's tables and analyses showing comparisons between the proposed project and the alternatives are flawed, frequently relying on incorrect conclusory assumptions that the effects are similar to the proposed project without adequate separate analyses supporting its conclusion. Please revise the tables and supporting analysis.

3. Modified Precise Plan without Parking Structure Alternative. The EIR should be revised to correct mischaracterizations and inadequate analysis of Alternative #Biii, as follows:

- This plan includes modification to the southern entrance road to allow 2-way traffic to enter and leave from both directions into the Alcazar parking lot.
- This plan provides 20 more spaces than currently exist in the Plaza de Panama and places them closer to the various museums than they had been previously or than would be provided in the proposed project.
- The managed traffic portion of the plan has been ignored in the EIR. This plan would

- Y-20 The project would not preclude residents and visitors from entering the Park on foot or bicycle through the arch.
- Y-21 Per the HRTR, the archery range was not considered a historic resource. Its features are non-permanent and are able to be moved to alternative locations as any point in time. This is evidenced by CMPP (page 287) which specifies that the archery range be relocated. This area is intended to be restored to a public, non-restricted use once the archery range is relocated.
- Y-22 The footprints of these missing 1915 buildings are no longer intact, having been regraded in 1935. Later buildings, such as the Japanese Friendship Garden structures and the Organ Pavilion restroom have also compromised these areas. There are no plans to reconstruct those 1915 buildings. No further analysis is necessary.
- Y-23 The lengthening of the Palm Canyon Bridge would not result in limitations on pedestrian access. The renovated bridge would accommodate ADA compliance and provide a greater amount of safer pedestrian access.
- Y-24 Access from the Palisades to the Plaza de Panama would not restrict pedestrian access during large events but would improve it with implementation of the Pan American Promenade as part of the project.
- Y-25 See response to comment S-7a.
- Y-26 The EIR analyzes the closing the Cabrillo Bridge based on SANDAG forecast models. This analysis includes a redistribution of trips on the I-5, SR-163, and local surrounding streets including Park Boulevard. Increase in parking demand and circulation in the Uptown area would also be expected for these alternatives as patrons would park in the West Mesa to walk across the Cabrillo Bridge.
- Y-27 As required under CEQA Guidelines Section 15126.6(e)(2), the EIR identifies an environmentally superior alternative. Section 9.4 provides a reasoned assessment of the alternative impact analysis discussed throughout Section 9.3, and as additionally summarized in Table 9-1.

SOHO EIR Comment Letter
 March 22, 2012
 Page 5 of 6

- The EIR should address impacts relating to the project's restriction of residents' and visitors' enjoyment of driving through the great arch into the heart of the historic park. Described by many as one of the greatest experiences that the region has to offer or "An experience that rivals the best of Europe." This method of visiting the historic core should be acknowledged as one of the major attractions in the San Diego region.
- The Archery Range is arguably historic and needs to be evaluated as a historic resource impacted by the proposed project.
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- The EIR should analyze traffic that would result from closing the Cabrillo Bridge, which SOHO believes will not increase in the Uptown area as stated in the EIR. Further analysis should address traffic routed up Park Boulevard from I-5, as it is most likely to occur.
- The EIR's tables and analyses showing comparisons between the proposed project and the alternatives are flawed, frequently relying on incorrect conclusory assumptions that the effects are similar to the proposed project without adequate separate analyses supporting its conclusion. Please revise the tables and supporting analysis.

Y-28

3. Modified Precise Plan without Parking Structure Alternative. The EIR should be revised to correct mischaracterizations and inadequate analysis of Alternative #Biii, as follows:

A

- This plan includes modification to the southern entrance road to allow 2-way traffic to enter and leave from both directions into the Alcazar parking lot.

B

- This plan provides 20 more spaces than currently exist in the Plaza de Panama and places them closer to the various museums than they had been previously or than would be provided in the proposed project.

C

- The managed traffic portion of the plan has been ignored in the EIR. This plan would

Y-28

A

Comment noted.

B

Comment noted.

C

The managed traffic proposed by this alternative would result in traffic impacts to the external roadways especially during a peak hour. When closing the bridge, circulation of traffic would be affected due to rerouting of vehicles that would normally access from the Cabrillo Bridge. These rerouted vehicles would cause significant impacts to the surrounding roadways (Park Boulevard, Presidents Way, Robinson Avenue, A Street and Sixth Avenue), most of which would not be mitigable.

LETTER

RESPONSE

SOHO EIR Comment Letter
March 22, 2012
Page 6 of 6

allow the Cabrillo Bridge, Plaza de Panama, and the West Prado to be car-free during the periods when most pedestrians are present. This results in a better pedestrian environment than the proposed project, with greater flexibility for park users, institutions, event producers, and surrounding neighborhoods. It allows visitors to experience the thrill of driving through the great Arch and enjoying the park from the automobile as was originally intended. When open, it facilitates cross park commuting and provides direct access to the Old Globe, museums, and restaurants.

- D • This plan significantly reduces pedestrian/vehicle conflicts. The EIR numbers should be re-evaluated, as there are calculation errors. The managed traffic component eliminates more conflicts than the proposed project.
- E • The proposed project introduces a more dangerous pedestrian/vehicle conflict where the proposed new bridge meets the Cabrillo Bridge
- F • This plan does not preclude or include the Spreckels Organ Pavilion parking structure.
- G • This plan does not anticipate any major regrading of the Alcazar Parking lots. No new retaining walls are planned.
- H • New ADA spaces for this lot would be created in the spaces next to the Alcazar garden and in existing ADA pathway.
- I • New ADA spaces would be created from existing spaces in the lot behind the Model Railroad museum and the Botanical building and new spaces would be created along Balboa way next to existing ADA pathways, minimizing the need for new grading.
- J • In addition to the area shown in the EIR illustration, new parking will be provided along the east side of the Alcazar Lot by relocating dumpsters.

Y-29 The EIR should be revised to designate Alternative 4Biii as the environmentally superior alternative.

Thank you very much.

Sincerely,



Bruce Coons

Y-28 (cont.)

- D The public review version of the TIA shows 19 conflict areas for Alternative 4Biii, but the final TIA has been revised to 16 conflict areas. 12 out of the 16 conflict areas are the same as the No Project Alternative. The managed traffic component of Alternative 4Biii (meaning the bridge is closed) would reduce the pedestrian/vehicle conflicts to 11. This alternative would not eliminate more conflict areas than the proposed project.
- E The project would not create a dangerous pedestrian/vehicular conflict at the intersection of Cabrillo Bridge and the Centennial Bridge. This intersection would be an all way stop controlled intersection with designated pedestrian crossings. The number of pedestrians expected to be crossing at this location is less than one-third of the number of pedestrians crossing at the Plaza.
- F Comment noted.
- G Comment noted.
- H Comment noted.
- I Comment noted.
- J Comment noted.

Y-29 See response to comment R-55.