



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.

THIS PAGE IS INTENTIONALLY BLANK.

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 Adams	RTC-133
AC	George Adams	RTC-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. Atkinson	RTC-146
AF	Arthur Ballantyne	RTC-147
AG	Richard Bazen	RTC-154
AH	Paul Black	RTC-196
AI	Peter Bridge	RTC-197
AJ	Ron Buckley	RTC-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 Lusi	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

RESPONSE

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

RESPONSE

Letter B

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
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 Interior's 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 the 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

2

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

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

RESPONSE

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

TTY 711

www.dot.ca.gov



*Flex your power!
Be energy efficient!*

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.

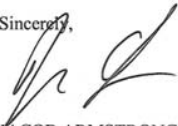
LETTER

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

RESPONSE

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 28th 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.

LETTER

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 (*Poliophtila 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 (CNDDB). The CNDDB 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 CNDDB 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 CNDDB 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 CNDDB 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.

RESPONSE

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 (CNDDB) 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

	<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>
--	---

LETTER

RESPONSE

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.I.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.
- 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.

LETTER

RESPONSE

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# 2011031074)

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

RESPONSE

Letter F

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

March 22, 2012

Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101Balboa 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 resource's 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 (NHL); 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 NHL 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

<p>Ms. Elizabeth Shearer-Nguyen March 22, 2012 Page 4</p> <p>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)</p> <p>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.</p> <p>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.</p> <p><u>Mitigation Measures</u></p> <p>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.</p> <p>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</p>	<p>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</p> <p>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.</p> <p>Refer to Section 4.3.</p> <p>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.</p> <p>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.</p> <p>F-11 Comment noted.</p>
--	--

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

1549 El Prado, Suite 1, San Diego, CA 92101 | Phone: 619.232.7502 | Fax: 619.232.7418 | bpcp.org

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@sanidiego.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,

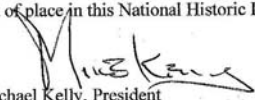
The Committee of One Hundred has worked since 1967 to preserve Balboa Park's historic buildings, gardens and public spaces.

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-2

J-3

J-1

Comment noted.

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

Comment noted.

LETTER

RESPONSE



CITIZENS COORDINATE FOR CENTURY 3

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

Letter K

DIRECTORS
John Lomac - President

Jay Corrales

Drew Hubbell

Roger Lewis

Nick Marinovich

Paul McNeil

Brian Mooney

Betsy Morris

Luisa Schultz

Mike Stepmar

Susan Riggs Tinsley

Jay Turner

March 21, 2012

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
K-6 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-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.

LETTER

RESPONSE

<div data-bbox="107 349 132 378">C</div> <div data-bbox="107 508 153 537">K-8</div> <div data-bbox="107 646 157 675">K-9</div> <div data-bbox="107 740 170 769">K-10</div> <div data-bbox="107 808 165 837">K-11</div> <div data-bbox="107 935 170 964">K-12</div>	<table border="1"> <tr> <td></td><td> <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> </td></tr> <tr> <td>DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3A + Figures 9.3a, 9.3b</td><td> <p><u>Alternative 3A: No New Parking Structure Alternative</u></p> <p>DEIR states that the No New Parking Structure will result in a net loss of 158 non-ADA parking spaces.</p> <p><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.</p> <p><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> </td></tr> <tr> <td>DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3B</td><td> <p><u>Alternative 3B: Organ Pavilion Parking Structure</u></p> <p>No specific comments or questions; this alternative is essentially approved in the adopted BPMP & CMPP.</p> </td></tr> <tr> <td>DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3C + Figures 9-5a, 9-5b</td><td> <p><u>Alternative 3C: West Mesa Parking Structure Alternative</u></p> <p><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> </td></tr> <tr> <td>DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3D + Figures 9-6a, 9-6b</td><td> <p><u>Alternative 3D: Inspiration Point Parking Structure</u></p> <p><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.</p> <p><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> </td></tr> </table>		<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>	DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3A + Figures 9.3a, 9.3b	<p><u>Alternative 3A: No New Parking Structure Alternative</u></p> <p>DEIR states that the No New Parking Structure will result in a net loss of 158 non-ADA parking spaces.</p> <p><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.</p> <p><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>	DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3B	<p><u>Alternative 3B: Organ Pavilion Parking Structure</u></p> <p>No specific comments or questions; this alternative is essentially approved in the adopted BPMP & CMPP.</p>	DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3C + Figures 9-5a, 9-5b	<p><u>Alternative 3C: West Mesa Parking Structure Alternative</u></p> <p><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>	DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3D + Figures 9-6a, 9-6b	<p><u>Alternative 3D: Inspiration Point Parking Structure</u></p> <p><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.</p> <p><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>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>										
DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3A + Figures 9.3a, 9.3b	<p><u>Alternative 3A: No New Parking Structure Alternative</u></p> <p>DEIR states that the No New Parking Structure will result in a net loss of 158 non-ADA parking spaces.</p> <p><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.</p> <p><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>										
DEIR Part 1, Exec. Summary, S.5.2.2. & Part 4, Section 9, 9.3.3B	<p><u>Alternative 3B: Organ Pavilion Parking Structure</u></p> <p>No specific comments or questions; this alternative is essentially approved in the adopted BPMP & CMPP.</p>										
DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3C + Figures 9-5a, 9-5b	<p><u>Alternative 3C: West Mesa Parking Structure Alternative</u></p> <p><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>										
DEIR Part 1, Exec. Summary, S.5.2.3. & Part 4, Section 9, 9.3.3D + Figures 9-6a, 9-6b	<p><u>Alternative 3D: Inspiration Point Parking Structure</u></p> <p><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.</p> <p><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>										
	<div data-bbox="1062 170 1188 199">K-7 (cont.)</div> <div data-bbox="1157 203 1633 232">C See response to comment K-48.</div> <div data-bbox="1062 261 2003 472"> <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> </div> <div data-bbox="1062 505 2003 748"> <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>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> </div> <div data-bbox="1062 1052 1352 1081">K-10 Comment noted.</div> <div data-bbox="1062 1114 2003 1235"> <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> </div> <div data-bbox="1062 1268 2003 1390"> <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> </div>										

LETTER

RESPONSE

<div data-bbox="100 297 170 329">K-13</div> <div data-bbox="100 386 170 418">K-14</div> <div data-bbox="100 456 170 488">K-15</div> <div data-bbox="100 586 170 618">K-16</div> <div data-bbox="100 656 170 688">K-17</div> <div data-bbox="121 695 149 727">A</div> <div data-bbox="121 776 149 808">B</div> <div data-bbox="197 277 932 1268"> <table border="1"> <tr> <td data-bbox="197 277 443 1057">Alternative 3C continued</td> <td data-bbox="443 277 932 1057"> <p><u>QUESTION:</u> 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><u>QUESTION:</u> What is the number of spaces in the northeast sector of Inspiration Point?</p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>COMMENT:</u> 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><u>COMMENT re View Corridor obstruction:</u> If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p><u>COMMENT:</u> 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> </td> </tr> <tr> <td data-bbox="197 1057 443 1268">DEIR Part 1, Exec. Summary, S.5.3.1.a. & Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b</td> <td data-bbox="443 1057 932 1268"> <p>Alternative 4Ai: <u>Gold Gulch Parking Structure Alternative</u></p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p> </td> </tr> </table> </div>	Alternative 3C continued	<p><u>QUESTION:</u> 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><u>QUESTION:</u> What is the number of spaces in the northeast sector of Inspiration Point?</p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>COMMENT:</u> 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><u>COMMENT re View Corridor obstruction:</u> If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p><u>COMMENT:</u> 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>	DEIR Part 1, Exec. Summary, S.5.3.1.a. & Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b	<p>Alternative 4Ai: <u>Gold Gulch Parking Structure Alternative</u></p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p>	<div data-bbox="1062 168 1203 201">K-12 (cont.)</div> <div data-bbox="1157 201 2003 323"> <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> <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. <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> </div> <div data-bbox="1062 724 2003 781"> <p>K-13 This response relates to Alternative 3D. See response to comment K-11.</p> </div> <div data-bbox="1062 813 2003 870"> <p>K-14 The northern section of Inspiration Point currently has approximately 386 standard spaces and 22 ADA spaces.</p> </div> <div data-bbox="1062 902 2003 1057"> <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> </div> <div data-bbox="1062 1089 2003 1268"> <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> </div> <div data-bbox="1062 1300 1635 1333"> <p>K-17 A See response to comment K-12.</p> </div> <div data-bbox="1157 1365 1451 1398"> <p>B Comment noted.</p> </div>
Alternative 3C continued	<p><u>QUESTION:</u> 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><u>QUESTION:</u> What is the number of spaces in the northeast sector of Inspiration Point?</p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>COMMENT:</u> 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><u>COMMENT re View Corridor obstruction:</u> If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p><u>COMMENT:</u> 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>				
DEIR Part 1, Exec. Summary, S.5.3.1.a. & Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b	<p>Alternative 4Ai: <u>Gold Gulch Parking Structure Alternative</u></p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p>				

LETTER

RESPONSE

K-18

K-19

K-20

K-21

K-22

Alternative 3C continued	<p><u>QUESTION:</u> 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><u>QUESTION:</u> What is the number of spaces in the northeast sector of Inspiration Point?</p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>COMMENT:</u> 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><u>COMMENT re View Corridor obstruction:</u> If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p><u>COMMENT:</u> 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>
DEIR Part 1, Exec. Summary, S.5.3.1.a, & Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b	<p>Alternative 4Ai: <u>Gold Gulch Parking Structure Alternative</u></p> <p><u>QUESTION:</u> 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><u>QUESTION:</u> 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><u>QUESTION:</u> What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p>

K-18 See response to comment K-12.

K-19 Comment noted. See response to comment K-16.

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.

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.

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.

LETTER

RESPONSE

K-23

K-24

K-25

K-26

K-27

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.
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?

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 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 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 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 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.

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.

LETTER

RESPONSE

K-28

K-29

K-30

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.
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?

K-28 Comment noted.

K-29 Comment noted.

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

K-31

K-32

A

B

K-33

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.

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.

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 Significant and unmitigable impacts are disclosed for the project, as well as the alternatives.

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.

LETTER

RESPONSE

K-34

K-35

K-36

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-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.

K-35 Comment noted.

K-36 Comment noted.

LETTER

RESPONSE

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>	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.
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	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.	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.
B		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.	B	For clarification purposes, Light Standards have been added to all simulations.
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	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.	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.
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	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.		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.
			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.

LETTER

RESPONSE

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-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-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-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-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.
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.

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

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

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

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 NHL. 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

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.

LETTER

RESPONSE

K-46

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?
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?
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?
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.
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.
DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park	<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

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

K-47

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>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>
K-48	<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>
A	
B	
K-49	<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>

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.

As concluded in Section 4.9.2.2 the net increase in greenhouse gas emissions due to operation of the project would not exceed the screening criteria and impacts associated with increased greenhouse gas emissions would be less than significant.

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.

B Expanded parking opportunities at various Park locations would not be precluded by the project, but are beyond its scope.

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.

In addition, the Organ Pavilion parking lot is currently one of the most highly occupied lots within the Central Mesa.

LETTER

RESPONSE

		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.	
K-50	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	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".	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.
K-51	DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected	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.)	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.
K-52	DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected	Why was an Archery Canyon parking structure not considered?	
A	Sec. 9.2.5, Project Alternatives, Alternatives Considered but Rejected, Quince Street Access Alternative	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. 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? 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?	K-52 A Comment noted. B See response to comment S-7. 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.
B			
C			

LETTER

RESPONSE

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

K-58

Alternatives, Conclusion Regarding the No New Parking Structure Alternative & Table 9-1, Comparison of Project and Alternatives Impacts Summary	impact on Park environment and user experience in the Park will be negligible.
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>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>
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	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.
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	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.

K-59

K-60

K-58 See response to comment K-11.

K-59 Comment noted.

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).

LETTER

RESPONSE

K-61	<table><tr><td>TRANSPORTATION, CIRCULATION & PARKING (Part 1, Conclusions, p.6, 8) (Part 3, Section 4.4, pp. 197-251) (Appendices D-1, D-2, D-3)</td><td>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.</td></tr><tr><td></td><td>QUESTION: Where will the parking behind the Organ Pavilion be accommodated during construction? The parking from the Alcazar lot?</td></tr><tr><td>1. DEIR Part 1, Conclusions, p.6, states that the proposed project will create significant but mitigable impacts on transportation, circulation and parking.</td><td>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.?</td></tr><tr><td>2. "The project would not add any traffic to external roadways or redistribute external traffic."</td><td>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.</td></tr><tr><td>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."</td><td>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?</td></tr><tr><td>K-66</td><td>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.</td></tr></table>	TRANSPORTATION, CIRCULATION & PARKING (Part 1, Conclusions, p.6, 8) (Part 3, Section 4.4, pp. 197-251) (Appendices D-1, D-2, D-3)	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.		QUESTION: Where will the parking behind the Organ Pavilion be accommodated during construction? The parking from the Alcazar lot?	1. DEIR Part 1, Conclusions, p.6, states that the proposed project will create significant but mitigable impacts on transportation, circulation and parking.	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.?	2. "The project would not add any traffic to external roadways or redistribute external traffic."	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.	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."	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?	K-66	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.	K-61 Comment noted.
TRANSPORTATION, CIRCULATION & PARKING (Part 1, Conclusions, p.6, 8) (Part 3, Section 4.4, pp. 197-251) (Appendices D-1, D-2, D-3)		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.												
		QUESTION: Where will the parking behind the Organ Pavilion be accommodated during construction? The parking from the Alcazar lot?												
1. DEIR Part 1, Conclusions, p.6, states that the proposed project will create significant but mitigable impacts on transportation, circulation and parking.		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.?												
2. "The project would not add any traffic to external roadways or redistribute external traffic."		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.												
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."	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?													
K-66	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.													
K-62	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	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	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	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-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,

A handwritten signature in black ink, appearing to read "Kris Michell".

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

RESPONSE

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

4901 Morena Boulevard, Bldg. 100, Ste. 104, San Diego, CA 92117
 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 NHL 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

N-4	LWVSD Support for Alternative 3-D: The LWVSD supports Alternative 3-D, the Inspiration Point Parking Structure, and believes that this alternative offers numerous benefits including the following:			
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.	N-4	A	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.		B	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.		C	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.		D	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.		E	Comment noted.
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.		F	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.
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.		G	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>		H	Comment noted.

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

MINGEI INTERNATIONAL MUSEUM

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

TRUSTEES H. MICHAEL COLLINS • ROGER C. CORNELL, M.D. • MAUREEN PECHT KING • SUSAN MACK OLIVER • ABBY SILVERMAN WEISS • SUSAN SPANOS • RICHARD WOLTMAN • TERRI PETERSON ZINDARS • LIFE TRUSTEES JEAN HAHN HARDY • DAVID RINEHART • JOANNE C. WARREN • FRANCES HAMILTON WHITE • LEGAL COUNSEL THOMAS A. HENRY, JR.

MINGEI INTERNATIONAL MUSEUM IS ACCREDITED BY THE AMERICAN ASSOCIATION OF MUSEUMS

O-1

Comment noted.

LETTER

RESPONSE

Letter P

From: [Micah Parzen](#)
To: [DSD EAS](#)
Cc: [Sanders, Jerry](#); [Lehner, Councilmember Sherri](#); [Faulkner, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Youna, Anthony](#); [DeMaio, Councilmember Carl](#); [Zard, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [info@plazadepanama.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: DSD EAS@sandiego.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

RESPONSE

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@sanidiego.gov

NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®
Western Office

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.

Western Office | Serving AK, AZ, CA, HI, IL, NY, OR, WA & the Pacific Island Territories
5 Third Street, Suite 707, San Francisco, CA 94103
P 415.947.0692 F 415.947.0699 E wro@nthp.org www.PreservationNation.org

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.

Western Office | Serving AK, AZ, CA, HI, ID, NV, OR, WA & the Pacific Island Territories
5 Third Street, Suite 707, San Francisco, CA 94103
P 415.947.0692 F 415.947.0699 E wro@ninthp.org www.PreservationNation.org

- 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

Western Office | Serving AK, AZ, CA, HI, ID, NV, OR, WA & the Pacific Island Territories
5 Third Street, Suite 707, San Francisco, CA 94103
P 415.947.0692 F 415.947.0699 E wro@nthp.org www.PreservationNation.org

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.



North Park Historical Society
2226 Dwight Street
San Diego, CA 92104
(619) 294-8990

Letter R

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.

LETTER

RESPONSE

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.

LETTER

RESPONSE

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:

5

- 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

<p style="text-align: center;"><i>NPHS Letter of Comment on Plaza de Panama Draft EIR</i></p> <p>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."</p> <p>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.</p> <p>Arizona Street Landfill</p> <p>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."</p> <p>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."</p> <p>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.</p> <p>Parking</p> <p>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?</p>	<p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
---	--

NPBS 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."

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

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."

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-18	See response to comment R-17.
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-19	Comment noted.
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-20	Comment noted.
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-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	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-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	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-23	See response to comment R-22.

7

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

<p style="text-align: center;"><i>NPHS Letter of Comment on Plaza de Panama Draft EIR</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>COMMENTS ON SECTION 4: ENVIRONMENTAL ANALYSIS</p> <p>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.</p> <p>Land Use</p> <p>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:</p> <p style="padding-left: 40px;">"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."</p> <p style="text-align: center;">9</p>	<p>R-25 Comment noted.</p> <p>R-26 Comment noted. See response to comment R-22.</p> <p>R-27 Comment noted. See response to comment R-22.</p> <p>R-28 Comment noted. See individual responses, below.</p> <p>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.</p>
---	--

LETTER

RESPONSE

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 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.
- A
- B

10

- 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

<p style="text-align: center;"><i>NPHS Letter of Comment on Plaza de Panama Draft EIR</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Public Services and Facilities</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>COMMENTS ON SECTION 9: PROJECT ALTERNATIVES</p> <p>No New Parking Structure Alternative</p> <p>Section 9.3.3A of the Draft EIR inaccurately analyzes the No New Parking Structure Alternative.</p>	<p>R-39 Section 4.12 has been revised to reference Figure 3-31 as showing the truck haul route.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>R-42 See response to comment R-22.</p> <p>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.</p> <p>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.</p>
---	--

LETTER

RESPONSE

<p style="text-align: center;"><i>NPHS Letter of Comment on Plaza de Panama Draft EIR</i></p> <p>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.</p> <p>R-46 The conclusions of Issue I-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.</p> <p>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.</p> <p>R-48 The conclusions regarding this alternative in Section 9.3.3A.3 state the following:</p> <p style="padding-left: 40px;">"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."</p> <p>These conclusions should be revised to incorporate the following points:</p> <ul style="list-style-type: none"> • 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 <p style="text-align: center;">13</p> <p>R-49</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p style="padding-left: 40px;">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.</p> <p>R-49 This comment correctly states the text of Objective 4, as provided throughout the EIR.</p> <p style="padding-left: 40px;">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.</p>

LETTER

RESPONSE

<p style="text-align: center;"><i>NPHS Letter of Comment on Plaza de Panama Draft EIR</i></p> <p>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."</p> <p>R-50</p> <ul style="list-style-type: none"> 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." <p>Environmentally Superior Alternative</p> <p>R-51</p> <p>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.</p> <p>R-52</p> <p>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.</p> <p>R-53</p> <p>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).</p> <p>R-54</p> <p>The Phased Alternative is the same as the Project, so should be excluded from being considered as the environmentally superior alternative.</p> <p>R-55</p> <p>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:</p> <ul style="list-style-type: none"> 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. <p style="text-align: center;">14</p>	<p>R-50</p> <p>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.</p> <p>R-51</p> <p>Comment noted.</p> <p>R-52</p> <p>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.</p> <p>R-53</p> <p>Comment noted.</p> <p>R-54</p> <p>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.</p> <p>R-55</p> <p>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.</p>
---	--

LETTER

RESPONSE

<i>NPHS Letter of Comment on Plaza de Panama Draft EIR</i>		
R-56	<ul style="list-style-type: none"> 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-56 See response to comment R-55.
R-57	<ul style="list-style-type: none"> 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-57 See response to comment R-55.
R-58	<ul style="list-style-type: none"> 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-58 See response to comment R-55.
R-59	<ul style="list-style-type: none"> 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-59 See response to comment R-55.
R-60	<ul style="list-style-type: none"> 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-60 See response to comment R-55.
R-61	<ul style="list-style-type: none"> 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-61 See response to comment R-55.
R-62	<ul style="list-style-type: none"> 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-62 See response to comment R-55.
R-63	<ul style="list-style-type: none"> 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-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 -GHG Emissions -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

NPBS 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.

LETTER

RESPONSE

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 COMMITTEEnorthparkplanning.orgLike us:  [NorthParkPlanning](https://www.facebook.com/NorthParkPlanning) Follow us:  [@NPPlanning](https://twitter.com/NPPlanning)

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 <i>Noise Element of the General Plan</i> and incorporated into the Noise Study in order to determine the impacts on the Speckles Pavilion during live events.	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 B C D	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 <i>Recreation Element of the General Plan</i> , 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 <i>Balboa Park Central Mesa Precise Plan</i> (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 <i>Economic Prosperity Element of the General Plan</i> , 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-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	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-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.

LETTER

RESPONSE

	<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. 	
S-4	<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. 	S-4 See response to comment S-3.
S-5	<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. 	S-5 See response to comment S-3.
S-6	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.	S-6 See response to comment S-3.
S-7	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:	
A	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.	S-7 A 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.
B	A Rural Local Road in the City of San Diego has the requirements of a 300' minimum horizontal curve radius.	B The roads within the Park are park roads, not residential local streets or rural local roads.

LETTER

RESPONSE

<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>
--	--

LETTER

RESPONSE

<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 M.E.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 M.E.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 M.E.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 M.E.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>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 M.E.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>
---	---

LETTER

RESPONSE

"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 M.E.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 M.E.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 M.E.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 M.E.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"*.

- S-16 A 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

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

	<p>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.</p> <p>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.</p>	
S-17	<p>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.</p>	S-17 This comment references Section 8.5. See response to comment R-9.
S-18	<p>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.</p>	S-18 See response to comment R-10.
S-19	<p>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".</p>	S-19 See response to comment S-13.
S-20	<p>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</p>	<p>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.</p> <p>See response to comment S-13.</p>

LETTER

RESPONSE

	<p>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. Therefore, the Project does not comply with the General Plan, Mobility Element Policy M.E.G.1: "Provide and manage parking so that it is reasonably available when and where it is needed".</p>	
S-21	<p>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>	S-21 See response to comment R-22.
S-22	<p>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>	S-22 See response to comments R-21 and R-31.
S-23	<p>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>	S-23 See response to comment R-22.
S-24	<p>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>	S-24 See response to comment K-49.

LETTER

RESPONSE

	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.	
S-25	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.	S-25 See response to comment R-22.
S-26	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.	S-26 See response to comment R-35.
S-27	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.	S-27 See response to comment R-47.
S-28	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.	S-28 See response to comments R-52 and R-55.
S-29	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.	S-29 The selection of the environmentally superior alternative is discussed in Section 9.4.
S-30	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).	S-30 See response to comments R-52 and R-55.
S-31	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.	S-31 See response to comments R-52 and R-55.
S-32	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	S-32 See response to comment R-66.

LETTER

RESPONSE

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

	<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>	
S-37	<p>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>	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.
S-38 A B	<p>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>	<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>
S-39	<p>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>	S-39 Comment noted.
S-40	<p>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>	S-40 Comment noted.

LETTER

RESPONSE

<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, Marie 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>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>

COUNCIL-ADOPTED PLANS

City of San Diego General Plan, Adopted 2008

LETTER

RESPONSE

<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>
--	--

LETTER

RESPONSE

<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> <i>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..."</i></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> <i>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.</i></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>
---	--

LETTER

RESPONSE

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."

A

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

<p>B</p> <p>S-54</p> <p>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:</p> <ul style="list-style-type: none"> • “to de-emphasize the automobile while increasing public access.” • “to create within the park a more pedestrian-oriented environment, reduce automobile and pedestrian conflicts, and minimize through traffic.” • “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” <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</p> <p>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.”)</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</p> <p>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</p>	<p>S-53 (cont.)</p> <p>B</p> <p>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</p> <p>Comment noted.</p> <p>S-55</p> <p>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</p> <p>Comment noted.</p>
---	--

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

<p><u>Circulation Element</u> <i>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:</i></p> <ul style="list-style-type: none"> • 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 <p>A The proposed project will result in <u>more</u> 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).</p> <p>B</p> <p>C</p> <p>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 <u>parking</u> from the Plaza (which we support), it does not call for eliminating automobile <u>traffic</u> from the Plaza, instead "minimizing" such traffic. (The SOHO alternative "Precise Plan Light" plan would comply with this policy).</p> <p>S-61 <u>Architectural and Landscape Element</u> <i>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."</i></p> <p>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 ambiance 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.</p> <p>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.</p> <p>C</p> <p>16</p>	<p>S-60 (cont.)</p> <p>A See response to comments S-8.</p> <p>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.</p> <p>C See response to comment S-70.</p> <p>D Comment noted.</p> <p>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.</p> <p>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.</p> <p>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.</p>
--	---

LETTER

RESPONSE

<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-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-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-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>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><u>Distribute Costs and Benefits Fairly</u></p>	<p>S-62 Comment noted.</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 The project would not affect the historic designation of the Park. The APE considered in Historic Resources Technical Report (HRTR) (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-65 See response to comment R-21.</p> <p>S-66 See response to comment S-9.</p>
--	--

LETTER

RESPONSE

<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’ <i>free</i> 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>
--	---

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 new 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.

LETTER

RESPONSE

- 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 put 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

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	1,765	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

	2005	2006	2007	2008	2009
Operating Revenue	\$1,083,810	\$1,013,740	\$1,070,470	\$1,065,470	\$1,170,470
Operating Expenses	\$570,774	\$519,889	\$544,773	\$575,440	\$571,230
Transit Capital	\$1,140,000	\$1,410,000	\$1,400,000	\$1,400,000	\$1,400,000
Net Operating Revenue	\$473,036	\$493,851	\$525,700	\$490,030	\$599,240
2010	2011	2012	2013	2014	
Operating Revenue	\$1,097,121	\$1,100,000	\$1,160,000	\$1,190,000	\$1,234,000
Operating Expenses	\$570,000	\$570,000	\$570,000	\$570,000	\$570,000
Transit Capital	\$1,140,000	\$1,410,000	\$1,400,000	\$1,400,000	\$1,400,000
Net Operating Revenue	\$477,121	\$530,000	\$590,000	\$620,000	\$664,000

Notes:
 1. Operating Revenue includes all revenue from parking tickets and other parking related revenue.
 2. Operating Expenses include all expenses for parking operations, including salaries and benefits, utilities, and other operating expenses.
 3. Transit Capital includes all capital expenditures for parking facilities, including the construction of parking structures and the purchase of parking equipment.
 4. Net Operating Revenue is the difference between Operating Revenue and Operating Expenses.
 5. All figures are in US dollars.

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
A

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:

B
C
D
E
F
G

- 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 FACILITIES, 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 ELEMENT)
- 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*

22

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.

LETTER

RESPONSE

<p>S-73</p> <p>H I J K L M N O</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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 FACILITIES, 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 ELEMENT) • Implementation of paid parking (RECREATION ELEMENT/ECONOMIC PROSPERITY ELEMENT) • The <i>Balboa Park Master Plan</i> preparation and ultimate adoption took 9 years of preparation, including a 3 year public input process. The <i>Balboa Park Central Mesa</i> <p>22</p>	<p>S-73 (cont.)</p> <p>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.</p> <p>I See response to comment S-8.</p> <p>J Comment noted.</p> <p>K See response to comment S-8.</p> <p>L Impacts to historic resources are disclosed in Section 4.2</p> <p>M Comment noted.</p> <p>N Comment noted.</p> <p>O Comment noted.</p>
---	---

LETTER

RESPONSE

<p>S-73 P</p> <p>Q</p> <p>R</p> <p>S</p> <p>T</p> <p>U</p> <p>V</p> <p>W</p> <p>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</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>Q Comment noted.</p> <p>R Comment noted.</p> <p>S Comment noted.</p> <p>T Comment noted.</p> <p>U 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>V See response to comment R-22.</p> <p>W See response to comment R-22.</p> <p>X Comment noted.</p>

LETTER

RESPONSE

<p>Y</p> <p>Z</p> <p>S-74</p> <p>A</p> <p>B</p> <p>C</p> <p>D</p> <p>E</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><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> <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><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>S-73 (cont.)</p> <p>Y</p> <p>Z</p> <p>S-74</p> <p>A</p> <p>B</p> <p>C</p> <p>D</p> <p>E</p> <p>Comment noted.</p> <p>Comment noted.</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>Comment noted.</p> <p>Comment noted;</p> <p>The project would provide automobile access that would pass under the promenade, consistent with the BPMP. See Figure 3-2.</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>
---	---

LETTER

RESPONSE

- 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 de 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:

- The Balboa Park Central Mesa Precise Plan is 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 | Comment noted. |
| | B | Comment noted. |
| | C | Comment noted. |
| | D | Comment noted. |
| | E | 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.

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

RESPONSE



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 Convey 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.

LETTER

RESPONSE



P.O. Box 33303
San Diego, CA 92163

619.238.1233
fax 619.685.5771
www.rhlfleet.org

Letter U

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

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,

A handwritten signature in blue ink, appearing to read 'Jeffrey W. Kirsch', is positioned above the typed name.

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

RESPONSE

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)

2001 PAN AMERICAN PLAZA SAN DIEGO, CA 92101 (619) 234-8291 FAX: (619) 233-4526 WWW.SANDIEGOAIRANDSPACE.ORG

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



750 B Street, Suite 1500 TEL 619.232.3101 SANDIEGO.ORG
San Diego / CA 92101 FAX 619.696.9371

W-1 Comment noted.

LETTER

RESPONSE

Letter X

From: [Chena Popper](#) on behalf of [Michael W. Hager](#)
To: [PSD EAS](#)
Cc: [Lighthouse](#), [Councilmember Sherri Faulkner](#), [Council Member Kevin](#), [Councilmember Todd Glodys Young](#),
[Anthony DeMaio](#), [Councilmember Carl Zapf](#), [Council Member Loris Emerald](#), [Councilmember Marti Alvarez](#),
[Council Member David](#); info@plazadepanama.org
Date: Thursday, March 01, 2012 3:37:54 PM
Attachments: [image001.jpg](#)

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,

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

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
Email: mhager@sdnhm.org

Mailing address: PO Box 121390, San Diego, CA 92112-1390
Street address: 1788 El Prado, San Diego, CA 92101
[Website](#) [Facebook](#) [Twitter](#)

 Please consider the impact on the environment before printing this message.



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

Letter Y

March 22, 2012

Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
via email: DSDEAS@sandiego.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 (NHL). The nature and extent of the project's unmitigable impacts to NHL integrity have an inadequate baseline and have been segmented in a way that avoids assessment of cumulative impacts to the NHL as a whole. Please revise the EIR to provide integrated analysis of the impacts of the project and each alternative to the NHL 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

BOARD OF DIRECTORS

Jaye MacAskill, President • Dan Soderberg, Vice President • Jessica McGee, Treasurer • John Eisenhart, Secretary • Curtis Drake, Ex-officio
Ken Anderson • David Goldberg • Erik Hanson • Judi O'Boyle • John Oldenkamp • Scott Sandel • Heather Sullivan
Bruce Coons, Executive Director

2476 San Diego Avenue • San Diego CA 92110 • www.sohosandiego.org • 619/297-9327 • 619/291-3576 fax

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 NHL, including a breakdown of each contributing feature. This does not constitute segmenting, but rather provides an overview of the structural contents of the NHL. The EIR concludes that impacts the project would result in significant and unmitigated impacts to on the Balboa Park NHL.

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.

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.

- 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 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.
- 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 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-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.

LETTER

RESPONSE

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.

2476 San Diego Avenue • San Diego CA 92110 • www.sohosandiego.org • 619/297-9327 • 619/291-3576 fax

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.

2476 San Diego Avenue • San Diego CA 92110 • www.sohosandiego.org • 619/297-9327 • 619/291-3576 fax

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

<p>SOHO EIR Comment Letter March 22, 2012 Page 5 of 6</p> <p>Y-20</p> <ul style="list-style-type: none"> 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. <p>Y-21</p> <ul style="list-style-type: none"> The Archery Range is arguably historic and needs to be evaluated as a historic resource impacted by the proposed project. <p>Y-22</p> <ul style="list-style-type: none"> 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. <p>Y-23</p> <ul style="list-style-type: none"> 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. <p>Y-24</p> <ul style="list-style-type: none"> 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. <p>Y-25</p> <ul style="list-style-type: none"> 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. <p>Y-26</p> <ul style="list-style-type: none"> 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. <p>Y-27</p> <ul style="list-style-type: none"> 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. <p>3. Modified Precise Plan without Parking Structure Alternative. The EIR should be revised to correct mischaracterizations and inadequate analysis of Alternative 4Biii, as follows:</p> <ul style="list-style-type: none"> 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 <p>2476 San Diego Avenue • San Diego CA 92110 • www.sohosandiego.org • 619/297-9327 • 619/291-3576 fax</p>	<p>Y-20</p> <p>The project would not preclude residents and visitors from entering the Park on foot or bicycle through the arch.</p> <p>Y-21</p> <p>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.</p> <p>Y-22</p> <p>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.</p> <p>Y-23</p> <p>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.</p> <p>Y-24</p> <p>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.</p> <p>Y-25</p> <p>See response to comment S-7a.</p> <p>Y-26</p> <p>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.</p> <p>Y-27</p> <p>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.</p>
---	---

LETTER

RESPONSE

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.
- 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.
- 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.
- 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.
- 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.
- 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

A

3. Modified Precise Plan without Parking Structure Alternative. The EIR should be revised to correct mischaracterizations and inadequate analysis of Alternative 4Biii, 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-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

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

RESPONSE

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.

LETTER

RESPONSE

Letter Z

March 21, 2012

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

Dear Ms. Shearer-Nguyen:

Z-1 On behalf of the Timken Museum of Art, I am submitting this letter of comment on the Draft EIR for the Plaza de Panama Project.

The Timken has taken a great interest in the Plaza de Panama Project since the project was first announced in 2010. As one of the institutions located on the Plaza de Panama, we will be living with the results of the project for many years to come.

While the Timken supports the Plaza de Panama Project in general our board and professional staff have a number of concerns particularly regarding the design of the Plaza itself. We presented these to the project architects at our recent board meeting on March 19.

Z-2 Indeed, the activation of the pedestrian space in front of our museum will be a welcome change from the dangerous circling of cars attempting, usually in vain, to find parking. While traffic in the Plaza currently travels at a slow pace, there are constant conflicts with pedestrians and it is not a very park-like experience. However, the current design of the Plaza, with a double row of trees surrounding the whole, is unacceptable to the Timken. As it stands now, the museum and the plaza fronting the building is blocked by a row of blighted dense pear trees. By adding a second row of trees in front of our building, however airy the foliage is expected to be, promises to render the museum as invisible as it is today to someone standing in the Plaza.

Z-3 The Timken was built as a consciously modern statement, an elegant and simple contrast to the beautiful and decorative Spanish-inspired and Art Deco buildings that existed when it opened in 1965. The building was constructed on a platform, visible on all sides (this has been altered by the loggia to the south built by the Committee of 100 as well as by the handicapped ramp to the northwest and its pendant planter to the southwest of the front door). The overall changes in the Plaza are not a restoration to 1915 but a rethinking for today's uses. Keeping the fountain in the center of the Plaza renders any restoration moot. Speaking for the board of the Timken, I would respectfully suggest that the plaza in front of the Timken be open to the Plaza de Panama as a whole, creating an L-shaped plaza and creating an open vista to one of the most important art collections in the United States and one of the crucial cultural attractions in southern California.

Z-4 We believe the Plaza de Panama project is a visionary solution to a problem that was inconceivable to the architects and planners of 1915, who intended all the buildings on the Plaza to be razed at the conclusion of the Fair. Please consider the issues of 2015 and the current uses of the Plaza as we move ahead with the project.

Z-1 Comment noted.

Z-2 The EIR does not disclose that the project would have any significant environmental impacts associated with the Timken Museum of Art aside from temporary construction noise.

Z-3 Comment noted. See also response to comment Z-2.

Z-4 Comment noted.

LETTER

RESPONSE

Thank you for your consideration.

Sincerely,

John Wilson
Director

Timken Museum of Art
1500 El Prado
Balboa Park
San Diego, California 92101

LETTER

RESPONSE

Letter AA

DuaneMorris*

FIRM and AFFILIATE OFFICES

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SAN DIEGO
BOSTON
HOUSTON
LOS ANGELES
HANOI
HO CHI MINH CITY
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
BOCA RATON
LAKE TAHOE

MEXICO CITY
ALLIANCE WITH
MIRANDA & ESTAVILLO

DAVID E. WATSON
DIRECT DIAL: +1 619 744 2289
PERSONAL FAX: +1 619 923 2508
E-MAIL: dewatson@duanemorris.com

www.duanemorris.com

March 22, 2012

VIA E-MAIL: DSDEAS@sandiego.gov

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

Re: **Project Name: BALBOA PARK PLAZA DE PANAMA**
Project No. 233958/SHC No. 2011031074

Dear Ms. Shearer-Nguyen:

AA-1

This firm represents the Zoological Society of San Diego, which operates the San Diego Zoo in Balboa Park. On behalf of the Society, we want to reiterate the Society's support of the Plaza de Panama project and its goal of removing parking and traffic from the Plaza de Panama. The Society strongly supports the efforts of the City and Dr. Irwin Jacobs to significantly improve Balboa Park facilities and its traffic and parking issues.

AA-2

As the Society has indicated in previous correspondence regarding this project, the Society remains concerned about appropriate mitigation for potential impacts the project's implementation may have on the Zoo parking lot and consequently on the Zoo itself. As a result, the Society engaged the traffic engineering firm of Linscott Law & Greenspan ("LLG") to review the traffic and parking portions of the draft environmental impact report ("DEIR") for the Plaza de Panama project. LLG's review primarily focused on topics such as parking supply and demand, construction impacts, study alternatives etc. that may significantly impact the San Diego Zoo and other stakeholders in the area. The following are the key findings of LLG's review:

Parking Section (Sections 3.4.7.3 and 4.4.1.4 of the DEIR)

1. The project proposes to implement "paid" parking at the Organ Pavilion to offset the cost

DUANE MORRIS LLP

101 WEST BROADWAY, SUITE 900 SAN DIEGO, CA 92101

PHONE: +1 619 744 2200 FAX: +1 619 744 2201

AA-1 Comment noted.

AA-2 Taking a pedestrian route, the distance from the closest Zoo parking space to the center of the Plaza de Panama would be approximately 2,300 feet and not 1,600 feet as mentioned in the comment. The Zoo parking lot is further from the Plaza de Panama than other free parking lots. These include the Pan American, Federal Building, and the Inspiration Point parking lots which are all either closer to the Plaza de Panama or are served by a free tram service.

The trip distribution analysis for the project took into consideration a paid parking structure. The displaced 125 patrons would be expected to park at the Federal/Aerospace and/or at Inspiration Point parking lots which are both currently underutilized and closer to the core of the Park and are served by a free tram service.

LETTER

RESPONSE

Elizabeth Shearer-Nguyen
March 22, 2012
Page 2

Duane Morris

associated with the construction of the underground parking facility. Paid parking will displace visitors to other free parking lots in the area such as the Zoo parking lot. The DEIR further states that 125 patrons will be displaced, which is a measurable amount. The Zoo parking lot is especially vulnerable to this phenomenon because it is in close proximity of the Plaza de Panama (approximately 1600 feet) and provides a large parking field that is well known to park patrons.

AA-3 Based on the parking survey data in the DEIR, the Zoo lot is at or near capacity (93% occupied on a weekday and 100% occupied on a Sunday). If the diverted 125 visitors park in the Zoo lot, there would be a parking deficit for Zoo patrons. **The DEIR does not address the parking implications of the 125 displaced visitors to the at capacity Zoo lot. A significant deficit of parking is expected for the Zoo with this plan. It is recommended that a common parking strategy (paid or free) be adopted for all the lots inside Balboa Park to avoid parking infringement and minimize unnecessary traffic from visitors attempting to find free parking.**

AA-4 2. The study identifies that a parking rate of \$5.00 for 5 hours will be charged for visitors. The study explains the rationale for the 5-hour duration based on an average stay of 3.1 hours (determined by a market study). **However, the DEIR does not explain how the \$5.00 rate (or \$1.00 per hour) was selected. The DEIR needs to conduct a market study to determine an appropriate rate.** The Gaslamp District metered on-street parking rates for Year 2011 were \$1.25 per hour. The Gaslamp District caters to a greater demand and can bear higher rates than Balboa Park, yet the parking rates are very similar (\$1.00 per hour vs. \$1.25 per hour). **Considering that free parking is available in the area, we believe that the parking rate of \$5.00 may be high, potentially may result in poor utilization of the parking structure and promote parking infringement on the free lots in the area.**

AA-5 3. **The DEIR parking section assumes a constant parking demand over time and does not address future growth of the park.** Given that the Park is celebrating its centennial year in 2015 and the improvements proposed as a part of the Plaza de Panama, the project is expected to attract visitors above historical trends and contribute to additional parking demand.

AA-6 4. The DEIR identifies that there will be a shift in employee parking (about 500 daily employees) given that the Organ parking structure will be "paid". The DEIR also identifies that the employees will shift to "free" lots such as the Zoo parking lot, Pan American the Federal and Inspiration Point. The DEIR does not demonstrate sufficient parking supply for employees post project and relies on off-site parking. **The DEIR does not identify designated employee areas to address employee parking spillback onto off-site lots.** Also, no Transportation Demand Management (TDM) techniques such as carpooling, vanpooling, transit subsidies etc. to reduce employee trips and parking

AA-3 See response to comment AA-2

AA-4 The proposed parking fees are based on market surveys and recognize the existing and projected demand in Balboa Park.

AA-5 The project would not be expected to generate additional parking demand in Balboa Park. Visitor growth in the demand models and financial projections are based on information provided by SANDAG as referenced in the 2006 Civitas study.

AA-6 See response to comments R-21 and S-13.

LETTER

RESPONSE

Duane Morris

Elizabeth Shearer-Nguyen
March 22, 2012
Page 3

demand were proposed in the DEIR. High-profile projects such as the Plaza de Panama are typically required to provide a TDM plan to reduce trips and congestion.

- AA-7 5. Balboa Park relies on the generosity of its many volunteers. However, the **DEIR fails to address how volunteer parking will be accommodated.** According to the DEIR, it appears parking cost be will be incurred by the volunteers as well, which would further exacerbate "free" parking shopping and may actually reduce volunteering efforts due to the added costs.

Traffic Section (Section 4.4.2.1 of DEIR)

- AA-8 6. The traffic analyses for the project were conducted for the near-term and long-term scenarios. **The DEIR does not state the assumptions for the near-term and long-term growth in Park traffic.** Given that the Park is celebrating its centennial year in 2015 and the aesthetic improvements proposed as a part of the Plaza de Panama, the project is expected to attract visitors above historical trends. **Anticipated park growth was not quantified or mentioned in the DEIR.** Was a traffic model or market study conducted to determine the additional traffic demand expected between now and Year 2015 and between now and Year 2030?

- AA-9 7. Given the project's proposal to have paid parking at the Organ Pavilion, the **DEIR does not quantify the amount of diverted traffic and the potential traffic implications for the recirculating traffic.**

Construction Section (Sections 3.8.2.2 of DEIR)

- AA-10 8. The DEIR identifies the haul route for the construction of the Organ Pavilion parking structure in Phase II to include the roadway segments on Zoo place and Zoo Drive. **The DEIR does not quantify the traffic implications (added delay and level of service) during construction due the movement of heavy trucks on Zoo Place and Zoo Drive.**

- AA-11 9. The Organ Pavilion parking structure (782 spaces) is proposed to be built on the existing Organ Pavilion lot (357 spaces). During the construction of the structure in Phase II for 14 months, the existing 357 spaces would not be available. Based on survey data, the Organ Pavilion lot is 95% (348 spaces) occupied on a weekday and 82% (298 spaces) occupied on a weekend. **The DEIR does not address how this demand will be accommodated during the construction period of 14 months. The surrounding parking does not appear to be able to support this demand.**

10. The DEIR does not present a parking supply and demand (visitors, employees, volunteers, construction crew etc.) for each construction phase.

- AA-7 Volunteers would be able to park in the parking structure or any of the free parking lots, including the Inspiration Point lot that is served by free transportation to the core of the Central Mesa.

- AA-8 A market study was not conducted. Anticipated Park growth was accounted for in the traffic forecasts and analyses.

- AA-9 The trips distributed and assigned within the Park were analyzed taking paid parking into consideration. An estimated 30 percent (Saturday peak hour) of patrons are expected to park at the paid structure versus estimated 40 percent (Saturday peak hour) with a free parking structure.

- AA-10 As discussed in Sections 4.4.2.1 and 4.12.6.1, the majority of the soil export operation would occur after hours and be restricted during peak daily traffic periods in order to minimize impacts to Park traffic along Park Boulevard, Zoo Place, and Pershing Drive.

The intersections and segments analyzed for the haul routes, including Zoo Place, would operate at an acceptable LOS C, as shown in Appendix M of the TIA. Zoo Drive roadway segment would not be affected by the construction route as the construction traffic would stay on Park Boulevard.

- AA-11 The Construction Phase Employee Parking Management Plan would be temporary, since the impact of displaced parking resulting from construction would be temporary until completion of the parking structure. A proper Employee Parking Management Plan would be a park-wide program which is beyond the scope limits of the project.

See response to comment K-62.

LETTER

RESPONSE

Elizabeth Shearer-Nguyen
March 22, 2012
Page 3

Duane Morris

demand were proposed in the DEIR. High-profile projects such as the Plaza de Panama are typically required to provide a TDM plan to reduce trips and congestion.

5. Balboa Park relies on the generosity of its many volunteers. However, the **DEIR fails to address how volunteer parking will be accommodated.** According to the DEIR, it appears parking cost will be incurred by the volunteers as well, which would further exacerbate "free" parking shopping and may actually reduce volunteering efforts due to the added costs.

Traffic Section (Section 4.4.2.1 of DEIR)

6. The traffic analyses for the project were conducted for the near-term and long-term scenarios. **The DEIR does not state the assumptions for the near-term and long-term growth in Park traffic.** Given that the Park is celebrating its centennial year in 2015 and the aesthetic improvements proposed as a part of the Plaza de Panama, the project is expected to attract visitors above historical trends. **Anticipated park growth was not quantified or mentioned in the DEIR.** Was a traffic model or market study conducted to determine the additional traffic demand expected between now and Year 2015 and between now and Year 2030?
7. Given the project's proposal to have paid parking at the Organ Pavilion, the **DEIR does not quantify the amount of diverted traffic and the potential traffic implications for the recirculating traffic.**

Construction Section (Sections 3.8.2.2 of DEIR)

8. The DEIR identifies the haul route for the construction of the Organ Pavilion parking structure in Phase II to include the roadway segments on Zoo place and Zoo Drive. **The DEIR does not quantify the traffic implications (added delay and level of service) during construction due the movement of heavy trucks on Zoo Place and Zoo Drive.**
9. The Organ Pavilion parking structure (782 spaces) is proposed to be built on the existing Organ Pavilion lot (357 spaces). During the construction of the structure in Phase II for 14 months, the existing 357 spaces would not be available. Based on survey data, the Organ Pavilion lot is 95% (348 spaces) occupied on a weekday and 82% (298 spaces) occupied on a weekend. **The DEIR does not address how this demand will be accommodated during the construction period of 14 months. The surrounding parking does not appear to be able to support this demand.**

AA-12

10. The DEIR does not present a parking supply and demand (visitors, employees, volunteers, construction crew etc.) for each construction phase.

- AA-12 Parking demand would not change during the construction phase of the project. Parking supply would be sufficient during each phase.

During Phase I construction, 70 parking spaces would be lost in Organ Pavilion parking lot. During Phase II construction, the remainder 297 parking spots would be lost in the Organ Pavilion parking lot. The Federal and Inspiration Point parking lots would be able to accommodate these displaced visitors, employees and volunteers as there would be a surplus of over 480 spaces available during a weekday peak time and over 1,300 open spaces during a typical Saturday. The project construction times are standard working hours Monday – Friday and all construction personnel parking during Phases I and II (maximum 135) would be required to park at the lower Inspiration Point parking lot and shuttled to the site separate from visitor shuttle/trolley.

During Phase III, the new parking structure would be operational and no impact to parking capacity is expected. The Alcazar parking lot would be closed and the 143 displaced patrons would be dispersed to the Federal, Inspiration Point and Pan American parking lots and ADA spots would be available at the Plaza. Construction personnel during this phase (maximum of 100) would again be required to park at the lower Inspiration Point parking lot.

During Phase IV, the new parking structure along with Alcazar parking lot would be operational and there would be no impact to the parking capacity from construction. The construction personnel (maximum of 50) would continue to park at lower Inspiration Point parking lot.

LETTER

RESPONSE

Elizabeth Shearer-Nguyen
March 22, 2012
Page 4

Duane Morris

Alternatives Considered But Rejected (Pages 18 to 27 of DEIR)

2004 Jones and Jones Land Use, Circulation and Parking Study Alternative

AA-13 11. The DEIR identifies the 2004 Jones and Jones Land Use, Circulation and Parking Study Alternative as rejected because of location of parking at the periphery. The proposed parking at the periphery locations did not meet objective 1 – “maintaining proximate vehicular access to Park’s institutions”. **The DEIR does not define “proximate” (in terms of walking distance or walking time). If the parking was proposed in the periphery, did the study alternatives analyze the feasibility of tram service to pick/drop-off visitors between the parking locations and the Park?**

AA-14 12. The DEIR identifies the 2004 Jones and Jones Land Use, Circulation and Parking Study Alternative as rejected because of greater environmental (traffic, air quality, noise, greenhouse gases etc.). **Was there an assessment conducted to specifically determine the level of environmental impacts?**

Zoo Parking Alternative

AA-15 13. The DEIR study rejected the Zoo Parking Alternative as the EIR for the Park Boulevard Promenade project concluded that there would be significant unmitigated impacts in Year 2020 on weekdays on SR 163 NB between I-5 and Washington Street in the afternoon peak hour. Based on our review, the significant impact on this segment was due to one (1) car. **Was this considered “significant” when rejecting this alternative?**

AA-16 The Society appreciates the opportunity comment on the DEIR and looks forward to working with the City for completion of a successful project for Balboa Park.

Very truly yours,



David E. Watson

DEW:ct

cc: Douglas G. Myers

AA-13 Based on Urban Land Institutes (ULI) Level of Service Conditions for Walking Distances from Parking Table, 2,000 feet (LOS D) is generally considered the maximum walking distance from a parking facility. The Jones and Jones Alternative proposes three parking structures. The Inspiration Point parking structure would exceed this maximum walking distance;; the Zoo Promenade parking structure would be approximately 1800 feet to the core of the Plaza de Panama, and a structure at the Archery Range would be approximately 1100 feet.

AA-14 No traffic analysis was applied to the Jones and Jones study. However, it is reasonable to assume greater impacts based on the significantly larger scale and scope of this alternative compared to the project. For example, the project would encompass approximately 15.4 acres and one parking structure while the Jones and Jones Alternative would encompass over 150 acres and three parking structures.

AA-15 As discussed in Section 9.2.3, the significant traffic impacts on SR-163 were one of three main reasons the Zoo Parking Alternative was considered but rejected; the other two reasons being similarity to other alternatives analyzed in full, and not meeting any of the project objectives.

AA-16 Comment noted.

LETTER

RESPONSE

Letter AB

From: [George Adams](#)
To: [DSD EAS](#)
Cc: [info@plazadepanama.org](#); [hernilinhtrn@sandiego.org](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zach, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); [booc@booc.org](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 11:10:17 AM

Dear Ms. Shearer-Nguyen:

AB-1

I strongly support approval of the Plaza de Panama Project. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

George Adams
 4025 Manzanita Dr
 San Diego, CA 92105

AB-1 Comment noted.

LETTER

RESPONSE

Letter AC

From: [George Adams](#)
To: [Lighthouse](#); [Councilmember Sherri Faulconer](#); [Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio](#); [Councilmember Carl Zafra](#); [Council Member Lorie Emerald](#); [Councilmember Marti Alvarez](#); [Council Member David Sanders](#); [Jerrry](#); [info@plazadepanama.org](#); [DSD FAS](#)
Subject: Support for Plaza De Panama
Date: Thursday, March 22, 2012 11:15:58 AM

San Diego City Council:

AC-1

I'm overjoyed at the Plaza De Panama project and agree this solution to traffic access from both sides of the park and the ingenious parking/park design has my overwhelming approval.

George Adams
 4025 Manzanita Dr
 San Diego, CA 92105

AC-1 Comment noted.

LETTER

RESPONSE

Letter AD

EMAIL TO: DSDEAS@SanDiego.gov

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

Hello,

AD-1

I strongly support approval of the Plaza de Panama Project. This project will reclaim the historic plazas and promenades in the core of the park from cars and return them to their historic pedestrian use. By providing an alternate route for vehicles, more than 6 acres of public parkland will be reclaimed.

The project implements a number of elements of the approved Central Mesa Precise Plan, including an underground parking structure behind the Spreckels Organ Pavilion, topped by a new 2-acre park, increasing visitor parking by nearly 300 spaces. Of all alternatives studied in the Draft EIR, the Plaza de Panama Project is the only one that balances the needs of the many park interests including:

- Restoration of the historic heart of Balboa Park
- Increases usable park space
- Increases access through additional parking and a free tram system
- Maintains access from both the east and west sides of the park

None of the alternatives accomplish all of these goals. I urge you to approve the Plaza de Panama Project and reject the alternatives.

Sincerely,

AD-1 Comment noted.

LETTER

RESPONSE

Below is a list of persons who signed the letter (AD).

- Amina Adan
- Leo Alcala
- Machel Allen
- Amy
- John Arvin, Manhattan Beach
- Anthony Baldman, San Diego
- Susan Barrera
- Paul Beard
- Whitney Benzian, San Diego
- Karen Berger, Solana Beach
- Toni Bloomberg, La Jolla
- Amy Baker Bridge
- Stephen Bushue
- Duke and Yolanda Campbell
- Maria Cortez, San Diego
- Andy Dillavou, San Diego
- Lorrain Duffy, La Jolla
- Katherine A.W. Eaton, San Diego
- Bjorn Endresen, San Diego
- Tim Erickson, San Diego
- Jeff Fargo, La Jolla
- Mathieu Gregoire
- William Hamilton, San Diego
- Bruce Heimborg, Lakeside
- Thomas Hemlock, San Diego
- Kim Herbstritt
- Barbara L. Hernly, San Diego
- Kipland Howard, San Diego
- Eric Johnson
- Donna Jones, San Diego
- Michael S. Kingsley, San Diego
- Jeff Larabee, La Mesa
- Stan Lattimore
- Dr. Kristine Hall Lavery, La Jolla
- Marsha Lyon, San Diego
- Robin Madaffer, San Diego
- Ahmed A Malinomar, San Diego
- Jill Maslac
- Sharon Mayer
- William Mayer, San Diego
- Agnieszka Melfi, San Diego
- Christopher Mordy, San Diego
- Larry Murnane, San Diego
- Christopher Alan Murphy, San Diego
- Jim Neri
- Paul Nierman, San Diego
- Leann Ortmann, San Diego
- Bruce Pastor, Jr.
- Mark and Linda Pennington, San Diego
- Gary Phillips, Poway
- Richard E. Preuss
- Rob Quigley, San Diego
- Alex Rivera, Escondido
- Steve Rivera
- Les Romack
- William N. Rowley, Palos Verdes
- Franklin Roxas
- Chris Ruiz, San Diego
- William H. Sauls, San Diego
- Carolyn Savage, Santee
- Martin Schmidt, San Diego
- Anne Sipes
- Scott Sugarman, San Diego
- James L. Tanner, La Mesa
- James R. Taylor, San Diego
- Braden Wasserman, San Diego
- Lorrie Webb
- Robert Wilson

LETTER

RESPONSE

From: OsaBooks@aol.com
To: DSD EAS
Cc: info@plazadepanama.org; [Lichtner, Councilmember Sherril](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zarf, Council Member Loris](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); boco@boco.org
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Wednesday, March 21, 2012 8:57:53 PM

Dear Ms. Shearer-Nguyen:

AD-2

I strongly support approval of the Plaza de Panama Project alternative. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

I am a member of several of the institutions in Balboa Park and have found it increasingly difficult to attend their programs for lack of parking. I hate to see park land taken up by parking, so it was a great revelation to see that the parking will be largely hidden with newly acquired green space with this Plaza...Project.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Karen Berger

725 N. Granados

Solana Beach, CA 92075

AD-2 Comment noted.

LETTER

RESPONSE

From: [Tim Erickson](#)
To: [DSD EAS](#)
Cc: [info@plazadepanama.org](#); [berillinhner@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zacif, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); [booc@booc.org](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 8:36:00 AM

Dear Ms. Shearer-Nguyen:

AD-3

I strongly support approval of the Plaza de Panama Project. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Tim Erickson

855 Emerald

San Diego, CA 92109

AD-3 Comment noted.

LETTER

RESPONSE

Mathieu Gregoire
3629 Arnold Ave.
San Diego, CA 92104
P:619.368.3884
F:619.220.8850
mgregoire@ucsd.edu
<http://mathieugregoire.net/>

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

Dear Ms. Shearer-Nguyen:

AD-4

I am a strong advocate of historic preservation. I have lived within two blocks of Balboa Park for 30 years. I walk and run in the park on a daily basis, and I strongly support approval of the Plaza de Panama Project. This is our first opportunity to reclaim the historic plazas and promenades in the core of the park from the decades old insult of vehicular traffic, and return them to the people, as the park's original designers intended them. By providing an alternate route, cars can be removed from the core of the park, resulting in more than 6 acres of reclaimed public parkland and significantly reducing the pedestrian/vehicle conflicts that occur today. The project brings back our history, and promotes our safety and the enjoyment of our great public spaces.

The project implements a number of elements of the approved Central Mesa Precise Plan, including an underground parking structure behind the Spreckels Organ Pavilion, topped by a new 2-acre park, increasing visitor parking by nearly 300 spaces. We need this parking and there is nothing wrong with members of the public paying a small fee for it.

Of all alternatives studied in the Draft EIR, the Plaza de Panama Project is the only one that balances the needs of the many park interests:

- It restores the **historic fabric** of the core of the park.
- It rescues the **beautifully scaled Plaza de California** from the curse of the automobile.
- Increases usable park space **for people rather than cars**.
- Increases access through **additional parking and a free tram system**.
- **Maintains access** from both the east and west sides of the park, which is important to accommodate the 12 million visitors that visit Balboa Park each year.
- A feature that has been seldom discussed relates to the only building in Balboa Park designed by San Diego's greatest architect, **Irving Gill**. The oft maligned bypass bridge segment would align with the front of this building in a way that would **feature its façade and bring it back into public awareness**.

None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park. **The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.**

Best regards,

Mathieu Gregoire

AD-4 Comment noted.

LETTER

RESPONSE

From: [Michael S. Kingsley](#)
To: [DSD EAS](#)
Cc: [info@plazadepanama.org](#); [hertlinbthner@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zacif, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); [booc@booc.org](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 9:17:59 AM

Dear Ms. Shearer-Nguyen:

AD-5

I strongly support approval of the Plaza de Panama Project. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Michael S. Kingsley

10354 Scripps Poway Parkway

San Diego, CA 92131

AD-5 Comment noted.

LETTER

RESPONSE

From: [Marsha Lyon](#)
To: PSD EAS
Cc: [info@plazadepanama.org](#); [berillibhner@sandiego.org](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zacif, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); [booc@booc.org](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 10:32:16 AM

Dear Ms. Shearer-Nguyen:

AD-6

I strongly support approval of the Plaza de Panama Project. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Marsha Lyon

4275 El Cajon Blvd

San Diego, CA 92105

AD-6 Comment noted.

LETTER

RESPONSE

From: [Chris Murphy](#)
To: [DSD EAS](#)
Cc: [info@plazadepanama.org](#); [bermighner@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zapf, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); [booc@booc.org](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 8:39:36 AM
Importance: High

Dear Ms. Shearer-Nguyen:

AD-7

I strongly support approval of the Plaza de Panama Project. There is no perfect solution for Balboa Park, but this one appears to be the best. *Please don't let "perfect" be the enemy of good.*

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Christopher Alan Murphy

815 Salem Court, San Diego, CA 92109

AD-7 Comment noted.

LETTER

RESPONSE

From: [Alejandro Rivera](#)
To: [P&D E&S](#)
Cc: ["info@plazadepanama.org"; "herrilichtner@sandiego.org"; Faulconer, Council Member Kevin; Councilmember Todd Gloria; Young, Anthony; DeMaio, Councilmember Carl; Zarf, Council Member Lorie; Emerald, Councilmember Marti; Alvarez, Council Member David; Sanders, Jerry; "booc@booc.org"](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 8:33:41 AM

Dear Ms. Shearer-Nguyen:

AD-8

I strongly support approval of the Plaza de Panama Project. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Alex Rivera

1140 N Ash
 Escondido Ca 92027

AD-8

Comment noted.

LETTER

RESPONSE

From: [Steve Rivera](#)
To: [DSD_EAS](#)
Subject: Balboa Park Plaza de Panama, Project No. 233958/SCH No. 2011031074
Date: Wednesday, March 21, 2012 3:15:49 PM

Afternoon,

AD-9

I support approval of the Plaza de Panama Project. This project will reclaim the the core of the park from cars and return them to their historic pedestrian use. More than 6 acres of public parkland will be reclaimed by providing an alternate route for vehicles. Of all alternatives studied in the Draft EIR, the Plaza de Panama Project is the only one that balances the needs of the many park interests including:

None of the alternatives accomplish all of these goals. I urge you to approve the Plaza de Panama Project and reject the alternatives.

Thank you for your time,
 Steve Rivera

AD-9 Comment noted.

LETTER

RESPONSE

From: [Chris Ruiz](#)
To: [DSD_EAS](#)
Cc: [info@plazadepanama.org](#); [hemilohnet@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Youno, Anthony](#); [DeMaio, Councilmember Carl](#); [Zanf, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); [booc@booc.org](#)
Subject: Comments on Plaza de Panama Project Draft EIR
Date: Thursday, March 22, 2012 2:09:30 PM

Dear Ms. Shearer-Nguyen:

I strongly support approval of the Plaza de Panama Project. The project gives us the first opportunity in decades to reclaim the historic plazas in the core of the park from cars and return them to their original pedestrian use.

Of all alternatives studied in the Draft EIR, this project is the only one that balances the needs of the many park interests by restoring the historic fabric of the park's core, increasing usable park space, increasing access through additional parking and a free tram system, and maintaining access from both the east and west sides of the park. None of the alternatives studies accomplish all of this, and they result in significant traffic impacts either inside or external to the park.

The Plaza de Panama Project should be approved and alternatives that only offer partial solutions should be rejected.

Sincerely,

Chris Ruiz

Chris.ruiz@att.net
 12674 Futura St
 San Diego, CA

AD-10

AD-10 Comment noted.

Letter AE

Stacey Higgins

From: Atkinson, Richard C. <RCA@ucsd.edu>
Sent: Thursday, March 22, 2012 11:38 AM
To: DSD EAS
Cc: Sanders, Jerry; Lightner, Councilmember Sherri; Faulconer, Council Member Kevin; Councilmember Todd Gloria; Young, Anthony; DeMaio, Councilmember Carl; Zapf, Council Member Lorie; Emerald, Councilmember Marti; Alvarez, Council Member David; 'info@plazadepanama.org'
Subject: Plaza de Panama--YES

RE: Comments for the Plaza de Panama Project Draft EIR

Dear Ms. Shearer-Nguyen,

AE-1

I am writing to add my support for the Plaza de Panama Project proposed by the Plaza de Panama Committee. I recently heard a presentation on the project, including the alternatives studied in the Draft EIR, and believe that this project is our best hope of reclaiming Balboa Park's grand plazas for public use.

The Draft EIR studied 13 alternatives to the proposed project, and it appears that none offers an impact-free way to achieve the goal of reclaiming public spaces in the park. Only the Plaza de Panama Project will clear vehicles from the core of the park and still allow cars to enter the park from the west. The project does a superb job of beautifying the park and making it more accessible to visitors, while still attending to the logistics of getting visitors to and from the park. The alternatives studied each have benefits and impacts, but none of them offers a satisfactory solution.

Dick

Richard C. Atkinson
President Emeritus, University of California
9500 Gilman Drive, # 0436
5320 Atkinson Hall <--necessary for FedEx deliveries
La Jolla, CA 92093-0436
phone: 858 822-3979
fax: 858 822-3978
e-mail: RCA@ucsd.edu
web: www.rca.ucsd.edu

AE-1 Comment noted.

LETTER

RESPONSE

Letter AF

ARTHUR B. BALLANTYNE
REAL PROPERTY RESEARCH CONSULTANT

P.O. BOX 126443
SAN DIEGO, CA 92112
(619) 449-3128

March 6, 2012

Mrs. E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
Fax 619/446-5499

Re: BALBOA PARK PLAZA DE PANAMA
Project #233958/SCH #2011031074

Dear Mrs. Shearer-Nguyen:

Please note the following comments for the forthcoming final EIR:

AF-1

1) Automobiles were not allowed within the 1915-16 Panama-California Exposition, including on the Plaza de Panama and Prado (and Cabrillo Bridge), except as granted by City Ordinance #5990 on January 6, 1915, to provide for "official visitors . . . with their automobiles", Sections 4 and 5 (copy enclosed). Automobiles were only allowed years latter.

AF-2

2) The proposed Centennial Bridge would not be viewable from an automobile while crossing easterly on the Cabrillo Bridge, as shown on the Draft EIR Figure 4.3-29, and the trees would screen views from pedestrians; therefore there should be no substantial adverse change.

AF-3

City officials are requested to allow the public to again experience the tranquillity of a pedestrian-only Panama de Panama and west Prado. Also, consider having the northerly bound tram stop south of the Plaza de Panama, then continue west to/thru the Alcazar Garden parking lot, then returning the same route to the Park Boulevard parking lot.

Sincerely,


Art Ballantyne

cc: Dr. Irwin Jacobs

AF-1 Comment noted.

AF-2 Comment noted.

AF-3 Comment noted.

LETTER

RESPONSE

⑥

DOCUMENT No. 84803

Filed JAN 6 1915 191

ALLEN H. WRIGHT
City Clerk

E. D. JOHNSTON
Mayor

ORDINANCE No. 5990

*Conferring upon
James C. Mc
Nagara Captain
Carpenters & Joiners
G. D. 11th Reading
JAN 6 1915*

Adopted by Common Council
JAN 6 1915

Approved by the Mayor
JAN 6 1915

Given into Effect
JAN 6 1915

Book 25, Page 22, File 45

ORDINANCE NO. 5990

AN ORDINANCE CONFERRING UPON THE PANAMA CALIFORNIA EXPOSITION, A CORPORATION, CERTAIN POWER AND AUTHORITY UNDER AND PURSUANT TO THE PROVISIONS OF CHAPTER 286 OF THE STATUTES OF THE STATE OF CALIFORNIA OF THE YEAR 1911, AND REPEALING ORDINANCE NO. 5910 OF THE ORDINANCES OF THE CITY OF SAN DIEGO, APPROVED NOVEMBER 27, 1914

FOR THAT WHEREAS, Section 2 of Chapter 286 of the Statutes of the State of California for the year 1911, entitled, "An Act giving and granting to the board of Park Commissioners of the City of San Diego the right to use and the right to authorize the use of Balboa Park in said City for exposition purposes", is as follows:

"Sec. 2. The board of park commissioners of the city of San Diego is hereby authorized and empowered to enclose any part or portion of said park which may be set aside for the use herein set forth and charge an entrance or admission fee to said exposition, and may sell, give, or grant, to any person or persons, association or associations, corporation or corporations, such rights, privileges and concessions as are usually granted by expositions, or such rights, privileges and concessions as may be expedient or necessary to the success of said exposition, and said city may charge and collect compensation therefor. The power and authority conferred by this act on the said board of park commissioners of the city of San Diego may be by said city delegated to any exposition, company or corporation now or hereafter organized for the purpose of promoting, financing, or giving said exposition", and

WHEREAS, it is the desire of the Common Council to confer upon and of the Board of Park Commissioners to have conferred upon the Panama California Exposition the power and authority mentioned in said Section 2; and

WHEREAS, it is the desire of the Panama California Exposition to receive and exercise said power and authority in said section mentioned; and

WHEREAS, it is the opinion of the Common Council, the Board of Park Commissioners and the Directors of the Panama

LETTER

RESPONSE

California Exposition that the conferring of such power and authority upon said Panama California Exposition and the exercise of the same by said Panama California Exposition will materially assist in the promoting, financing and holding of said Exposition, and will greatly facilitate the directors of said Panama California Exposition in directing and superintending the organization of said Exposition and in conducting the same; NOW THEREFORE,

BE IT ORDAINED, By the Common Council of the City of San Diego, as follows:

Section 1. That the power and authority conferred upon the Board of Park Commissioners by Section 2 of that certain act entitled, "An Act giving and granting to the board of park commissioners of the city of San Diego the right to use and the right to authorize the use of Balboa Park in said city for exposition purposes", approved March 24, 1911, and being Chapter 286 of the Statutes of the State of California for the year 1911, be and the same is hereby conferred upon and delegated to the Panama California Exposition, a corporation, organized and existing under and by virtue of the laws of the State of California, and organized for the purpose of promoting, financing and giving said Panama California Exposition in Balboa Park in the City of San Diego, County of San Diego, State of California.

Section 2. The power herein conferred upon and delegated to said Panama California Exposition shall be construed as authorizing and empowering said Panama California Exposition to enclose any part or portion of Balboa Park in said City of San Diego, which may be set aside for the use of said Panama California Exposition in holding an exposition during the year 1915, and to charge an entrance or admission fee to said Exposition, or to sell, give or grant to any person or persons, association or associations, corporation or corporations,

Park road would be at a LOS D in 2030 for the Gold Gulch Alternative per the traffic analysis. However, the traffic analysis does not properly represent the Gold Gulch Alternative along Presidents Way causing this to be an improper conclusion per the following analysis. Exhibit 18 of the TS (Existing with Proposed Project Total Traffic Volumes (Saturday)) shows 10,974 trips on Presidents Way approaching the intersection with Centennial Road. Exhibit 70 of the TS (2030 with Alternative 4Ai Total Traffic Volumes (Saturday)) shows only 9,800 trips on the same link for the Gold Gulch Alternative. Table 21 of the TS (Existing + Project Intersection LOS Analysis Internal Streets (Saturday)) shows the Presidents Way/Centennial Road Intersection having a worse case LOS C on one movement for the Proposed Project. However, Table 118 of the TS (2030 + Project Alternative 4Ai Intersection LOS Analysis Internal Streets (Saturday)) shows two movements having a LOS D for the Gold Gulch Alternative. It defies logic that when the traffic is less for the Gold Gulch Alternative in 2030 than the Existing + Proposed Project traffic today that the TS would conclude that the Gold Gulch Alternative would have more of an impact. Even though LOS D does not indicate mitigation being required, the report indicates that this intersection would not operate well for the Gold Gulch Alternative. This LOS D result is "manufactured" by the traffic engineer who arbitrarily assigned far more traffic to the Palisades link on Presidents Way in the Gold Gulch alternative. Also, the TS errors by not showing any of the traffic on Presidents Way entering the Gold Gulch parking structure before the intersection which would substantially reduce the traffic going through the intersection.

Even more importantly, the TS distributes only 20% of the trips from Park Blvd. to the new Park Road in the Gold Gulch Alternative leaving 80% on Presidents Way. This ignores several logical conclusions as follows:

- i. The intersection of Park Blvd./Presidents Way would operate at a LOS E and F in 2030 both for the Proposed Project and the No Project Alternative per Table 28 of the TS (2030 + Project Intersection LOS Analysis External Streets (Saturday)). No mitigation is required from the Proposed Project since this intersection would fail without the project. What is not addressed is that motorists would want to avoid this delay which would be motivation to use the new Park Road proposed in the Gold Gulch Alternative. Therefore, with the use of standard signage motorists would understand that the second left turn also serves Balboa Park and the parking structure and choose to continue on to the new Park Road to avoid the backup.
- ii. The new Park Road goes directly to the parking structure and would be the shortest way to the new Alcazar Garden drop-off, valet and ADA accessible lot. Residents would quickly understand this and logically use the new Park Road instead of the less direct Presidents Way access. Most tourists should be able to understand

- the signs, but it should also be noted that many tourists are brought to the park by residents who would be familiar with this situation.
- iii. Based on this analysis, assigning only 20% of the traffic from Park Blvd. to the new Park Road is indefensible. A more appropriate assignment would be in the 50% range. Therefore, the Gold Gulch Alternative would mitigate the Park Blvd./Presidents Way intersection to a level of non-significant as an added benefit and further justification for adding a second access from Park Blvd.
 - iv. Since the traffic would be substantially reduced on Presidents Way for the Gold Gulch Alternative using this logic, the intersection determined to fail in 2030 for the Proposed Project at Presidents Way/Centennial Road would operate at even better than the LOS D in 2030 as currently shown for the Gold Gulch Alternative. This improved LOS would occur even with the TS ignoring the garage entrance diversion and arbitrarily increasing the traffic assigned to the Palisades link as pointed out above.
3. *"The Gold Gulch Parking Structure Alternative also would result in fewer benefits than the project..."*.
- This statement is based on no benefit being considered unless it addressed a significant, unmitigable impact for the Proposed Project as identified in the DEIR. The Gold Gulch Alternative would have significant benefits over the Proposed Project and would still meet all the project objectives. Following is a list of the additional Gold Gulch Alternative benefits.
- a) The Gold Gulch Alternative would provide 2.9 acres of new usable park land while the project would provide only 2.2 acres. More importantly, the 2.9 acres could be used in any manner desired and would not limit any options 20, 50 or more years from now. The Water & Transportation Building that occupied the site in the 1935 Exposition could even be rebuilt: not an option with the Proposed Project.
 - b) The additional access from Park Blvd. would mitigate for two intersections which would otherwise operate at an unacceptable LOS in 2030. The second access would become even more important when special, or unexpected, park activities required the closing of the Cabrillo Bridge because it would allow traffic to continue to use the park in an orderly fashion by dispersing the vehicles.
 - c) The Gold Gulch Alternative would separate the vehicles, pedestrians and trams. This would allow the trams to operate much more safely and at an increased speed.
 - d) During construction there would be substantially less impact from the noise, air pollution, traffic disruption and inconvenience to park visitors. 64% less soil would be exported and the Organ Pavilion parking lot would continue to operate until the new parking structure was completed thereby avoiding the cost and inconvenience of visitors having to park in remote lots and taking a tram to their destination.

LETTER

RESPONSE

AUDITOR'S CERTIFICATE. I HEREBY CERTIFY that the appropriation made, or indebtedness incurred, by reason of the provisions of the annexed ordinance, can be made or incurred without the violation of any of the provisions of the Charter of the City of San Diego, California.

Dated _____ 191____

Auditor of the City of San Diego, California.

Passed and adopted by the Common Council of the City of San Diego, California, this 6th day of January, 191____, by the following vote, to-wit:

AYES—Councilmen Schmidt, Manny, Pembrough
and Adams

NOES—None

ABSENT—Councilman Fay

and signed in open session thereof by the President of said Common Council, this 6th day of January, 191____.

I HEREBY CERTIFY that the foregoing ordinance was by a two-thirds vote of all the members of the said Common Council, present, put on its final passage at its first reading, this 6th day of January, 191____.

City Clerk of the City of San Diego, California.

City Clerk of the City of San Diego, California, and Ex-officio Clerk of the Common Council of the City of San Diego.

I HEREBY CERTIFY that the foregoing ordinance was not finally passed until it had been read at two separate meetings of the said Common Council, viz: On the _____ day of _____, 191____, and on the _____ day of _____, 191____.

City Clerk of the City of San Diego, California, and Ex-officio Clerk of the Common Council of the City of San Diego.

I HEREBY APPROVE the foregoing ordinance this 6th day of January, 191____.

[SEAL] Attest:

City Clerk of the City of San Diego, California.

Mayor of the City of San Diego, California.

Deputy.

Deputy.

15-24-11-30-1913 Press

Letter AG

BALBOA PARK PLAZA DE PANAMA
PROJECT NO. 233958/SCH NO. 2011031074
RESPONSE TO THE DEIR REGARDING THE
GOLD GULCH CANYON PARKING STRUCTURE ALTERNATIVE

AG-1

This response is in reference to the Gold Gulch Parking Structure Alternative which provides an alternative design only for the Proposed Project elements starting at the Organ Pavilion and extending southerly and easterly to Presidents Way. A variation of this alternative was also submitted to illustrate possible refinements that might be desirable, but it was not included in the Draft Environmental Impact Report (DEIR) so it will not be addressed in this response. The Gold Gulch Alternative was designed to better meet the project objectives by substantially reducing many impacts considered non-significant for the Proposed Project in this DEIR, but are still a concern for future users of the park that the City of San Diego will eventually have to resolve. The alternative was also designed to better serve the public needs in Balboa Park not only for the Centennial Celebration, but in 25, 50 or even 100 years into the future.

AG-2

The Gold Gulch Parking Structure Alternative has been engineered extensively with the concept being refined ever since it was first introduced to the Plaza de Panama design team in October of 2010. Attached is a detailed grading plan, aerial photo with the project overlaid, the parking structure plan view and elevations, and an aerial photo overlaid with both the Proposed Project and the Gold Gulch Alternative so the public can better understand the concept (see Exhibits 1 thru 5). It is unfortunate that this illustrative information, which was available to the DEIR preparers, was not included in the DEIR so the public would fully understand the concept.

AG-3

The Gold Gulch parking structure is first addressed as Alternative 4Ai on page 12 of the Conclusions section of the DEIR. Several items are misrepresented, under represented or not included in this section as noted in the following response. Note that excerpts from the DEIR are shown in italics with quotation marks.

1. *"The parking structure would be a five-level structure, resulting in the same net increase in parking spaces as the project."* The proposed project would have 798 parking spaces while the Gold Gulch alternative would have 953; a net difference of 155 parking spaces. This increase results from the Gold Gulch parking structure needing to "bridge" the canyon and to extend down to the canyon floor (see Exhibit 4). This would allow more visitors to park in close proximity to the park attractions without increasing costs since the Gold Gulch parking structure would require excavation only on the ends.
2. *"The Organ Pavilion parking lot would be converted to parkland, and green space would be added behind the Organ Pavilion."* This is correct, but it fails to point out that 2.9 acres of new, usable park land would be created by the Gold Gulch Alternative which would not be restricted in its potential use (see Exhibit 1). This new park land would not only be an increase of 0.7 acre over the Proposed Project; it also would be much more valuable park land since there would be no physical constraints to any use. Without having the limitation of building on the

AG-1

Comment noted. In accordance with CEQA Guidelines Section 15126.6(b), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project. The EIR need not address every conceivable alternative and rather it must consider a reasonable range of feasible alternatives per CEQA Guidelines Section 15126.6(a). The analysis in Section 9.0, including the Gold Gulch Parking Structure Alternative (EIR Alternative 4Ai) analysis, adequately provides a reasonable range of alternatives to allow for a meaningful discussion of project alternatives that avoid or substantially lessen significant impacts of the project. Many of the suggested alternative modifications provided in this comment letter would not further reduce the project's significant environmental impacts or meet additional project objectives not achieved by the Gold Gulch Parking Structure Alternative, and were thus not incorporated into the Final EIR.

For further information, see the individual responses provided below.

AG-2

Comment noted. The Gold Gulch Parking Structure Alternative provided herein, although similar, is not identical to the EIR Alternative 4Ai Gold Gulch Parking Structure Alternative (see Section 9.3.4Ai.1).

AG-3

See response to comment AG-1. As indicated in Section 9.3.4Ai.1, the Gold Gulch Parking Structure Alternative analyzed in the EIR consists of a 797-stall structure and would require 51,500 cubic yards of export soil. To allow for an equitable comparison of impacts, the parking structures under all applicable alternatives were assumed to have an equal number of spaces. The revision of the EIR Gold Gulch Parking Structure Alternative to include additional parking is not necessary per CEQA Guidelines Section 15126.6(f), as the inclusion of additional spaces would not further reduce a significant project impact or meet additional project objectives not already obtained by the alternative.

BALBOA PARK PLAZA DE PANAMA
PROJECT NO. 233958/SCH NO. 2011031074
RESPONSE TO THE DEIR REGARDING THE
GOLD GULCH CANYON PARKING STRUCTURE ALTERNATIVE

This response is in reference to the Gold Gulch Parking Structure Alternative which provides an alternative design only for the Proposed Project elements starting at the Organ Pavilion and extending southerly and easterly to Presidents Way. A variation of this alternative was also submitted to illustrate possible refinements that might be desirable, but it was not included in the Draft Environmental Impact Report (DEIR) so it will not be addressed in this response. The Gold Gulch Alternative was designed to better meet the project objectives by substantially reducing many impacts considered non-significant for the Proposed Project in this DEIR, but are still a concern for future users of the park that the City of San Diego will eventually have to resolve. The alternative was also designed to better serve the public needs in Balboa Park not only for the Centennial Celebration, but in 25, 50 or even 100 years into the future.

The Gold Gulch Parking Structure Alternative has been engineered extensively with the concept being refined ever since it was first introduced to the Plaza de Panama design team in October of 2010. Attached is a detailed grading plan, aerial photo with the project overlaid, the parking structure plan view and elevations, and an aerial photo overlaid with both the Proposed Project and the Gold Gulch Alternative so the public can better understand the concept (see Exhibits 1 thru 5). It is unfortunate that this illustrative information, which was available to the DEIR preparers, was not included in the DEIR so the public would fully understand the concept.

The Gold Gulch parking structure is first addressed as Alternative 4Ai on page 12 of the Conclusions section of the DEIR. Several items are misrepresented, under represented or not included in this section as noted in the following response. Note that excerpts from the DEIR are shown in italics with quotation marks.

1. *"The parking structure would be a five-level structure, resulting in the same net increase in parking spaces as the project."* The proposed project would have 798 parking spaces while the Gold Gulch alternative would have 953; a net difference of 155 parking spaces. This increase results from the Gold Gulch parking structure needing to "bridge" the canyon and to extend down to the canyon floor (see Exhibit 4). This would allow more visitors to park in close proximity to the park attractions without increasing costs since the Gold Gulch parking structure would require excavation only on the ends.
2. *"The Organ Pavilion parking lot would be converted to parkland, and green space would be added behind the Organ Pavilion."* This is correct, but it fails to point out that 2.9 acres of new, usable park land would be created by the Gold Gulch Alternative which would not be restricted in its potential use (see Exhibit 1). This new park land would not only be an increase of 0.7 acre over the Proposed Project; it also would be much more valuable park land since there would be no physical constraints to any use. Without having the limitation of building on the

AG-4 It is noted that approximately 6.3 acres of parkland would be reclaimed under this alternative. The project would also reclaim a total of 6.3 acres of parkland including the plazas, pedestrian promenades, and usable parkland regained in the organ pavilion lot. See response to comment BT-32. Within this context, this alternative would reclaim a total of 7.0 acres. This is 0.7 acre more than the proposed project. The potential for an increase in usable parkland provided by the Gold Gulch Alternative compared to the project is not significant information for the alternatives impact analysis, as the inclusion of additional spaces would not further reduce a significant project impact or meet additional project objectives. In accordance with CEQA Guidelines Section 15126.6(b), the focus of the alternatives analysis is to identify alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project.

It is noted that reconstruction of historic buildings would not further meet project objectives, is not recommended by the Balboa Park Master Plan or Central Mesa Precise Plan, and may result in additional historic impacts, and, therefore, would not be appropriate to include in this alternative. The EIR Gold Gulch Parking Structure Alternative does not include uses beyond those identified in Section 9.3.4Ai.1.

The remainder of this comment does not comment on the adequacy or accuracy of the environmental document. Comment noted.

AG-4

LETTER

RESPONSE

<p>parking structure deck, future generations could elect to reconstruct historical buildings, such as the Water & Transportation Building built on the site for the 1935 Exposition, or redesign the area any way they would feel appropriate. Since planters would not be used, small, quality trees could be planted today that when mature in 25 to 50 years into large trees which would be a legacy to this generation's foresight as evidenced in Balboa Park today by past generations contributions.</p> <p>AG-5 3. <i>"The Gold Gulch Parking Structure Alternative would not avoid any of the project's significant and unmitigable impacts, ...". This is correct; however, it would reduce many of the projects significant and mitigable impacts, e.g. exporting 51,500 cubic yards of soil instead of the 142,000 cubic yards that would be exported by the Proposed Project and mitigating the Level of Service (LOS) for the Park Blvd./Presidents Way intersection that would operate at a LOS F in 2030 without the Gold Gulch Alternative.</i></p> <p>AG-6 4. <i>"...and would result in additional potentially significant unmitigable impacts...". It is not a requirement of the DEIR to analyze the alternatives in the same detail as the project, but there should be enough information provided so that it can be determined if the impacts noted could potentially be mitigated. The error in the above statement will become clear as several misrepresentations and conclusions made in the DEIR are corrected in this response.</i></p> <p>AG-7 5. <i>"One of the proposed improvements for this alternative is the modification and realignment of the existing signalized intersection of Park Boulevard and Inspiration Point Way (Still Avenue).... The development of this alternative would potentially impact existing structures and buildings, including the Veterans Memorial located east of Park Boulevard or the World Beat Cultural Center building west of Park Boulevard." Although it is correct to say "potentially", it implies that this is a significant physical issue. In fact, there are probably not going to be any significant issues, and certainly none that cannot be mitigated, which can be confirmed by a review of the attached aerial photograph with the proposed road overlaid (see Exhibit 6).</i></p> <p>AG-8 6. <i>"This alternative would have similar traffic impacts compared to the project...". Providing two accesses from Park Boulevard would provide many improvements to the traffic circulation needs of Balboa Park and the Proposed Project traffic circulation. The Gold Gulch traffic impacts were not properly analyzed in the traffic report which will be addressed in detail later in this response.</i></p> <p>AG-9 7. <i>"...with one internal roadway/intersection that would operate poorly, resulting in a significant, mitigable impact." When the traffic circulation is analyzed properly, this intersection does have a significant impact, but it is less than the proposed project. This will be explained further later in this response.</i></p> <p>8. <i>"The Gold Gulch Parking Structure Alternative also would result in the same significant, unmitigable noise (temporary construction)</i></p>	<p>AG-5 As concluded in Section 9.3.4Ai, the Gold Gulch Alternative would result in lesser impacts associated with Air Quality and Greenhouse Gas Emissions – both of which are attributed to less soil export than required under the project.</p> <p>The project would not result in a significant impact at the Park Boulevard/Presidents Way intersection in the year 2030 (Section 4.4.2.2d). As with the project, the Gold Gulch Parking Structure Alternative would also not cause a significant impact at this intersection. Similar to No Project conditions, the intersection of Presidents Way and Park Boulevard in the year 2030 would operate at a level of service E (AM Peak Hour and LOS F (PM Peak Hour) under both the year 2030 plus project condition and the year 2030 plus Gold Gulch Parking Structure Alternative condition.</p> <p>AG-6 This quote provided is from the Conclusions regarding the Gold Gulch Parking Structure Alternative EIR Section 9.3.4i.3. This section is meant to provide a summary of the Gold Gulch Parking Structure Alternative analysis. It is also noted that the sentence indicates that the potentially unmitigated impacts of the project would not be avoided. See the analysis in Section 9.3.4Ai.2 for the detailed analysis of the significant and unmitigated impacts.</p> <p>AG-7 This reference to the potential impact has been deleted in the EIR Section 9.3.4Ai.3. 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 detailed engineering.</p> <p>AG-8 See response to comment AG-15.</p> <p>AG-9 See response to comment AG-15.</p>
---	---

LETTER

RESPONSE

AG-10

and the same mitigable impacts to ...". The Gold Gulch Alternative would significantly reduce many of these impacts which should be acknowledged. Previously (see item 4 above) the potential for other potentially significant impacts for the Gold Gulch Alternative was emphasized, so the potential for reducing the Proposed Project impacts should also be acknowledged. Reducing the amount of soil export by 64% and having the construction down in the canyon would substantially reduce the construction impacts, even if it is determined that the alternative does not reduce the impacts to a level of non-significance after more detailed review. Another construction impact substantially reduced by the Gold Gulch Alternative is that the Organ Pavilion parking lot can continue to operate during the approximately 14 months it takes to build the parking structure.

AG-11

9. "While this alternative would attain several of the project objectives, ... it would not maintain parking proximate access to the Park's institutions (Objective 1), because it would place the parking structure further from Plaza de Panama than the project." The distance from the project parking structure elevator to the north side of the Organ Pavilion would be 651 feet. The distance to the same location from the Gold Gulch elevator would be 783 feet, a less than significant difference of 132 feet, especially with the incorporation of a tram system to accommodate people not desiring, or unable, to walk to the park attractions. The paths of travel as measured are shown are on the attached exhibit with both projects overlaid (see Exhibit 7). With the additional 155 parking spaces provided by the Gold Gulch Alternative there would be a significant increase in parking proximate to the Park's institutions. Therefore, it could be argued that the Gold Gulch Alternative better meets this project objective than the Proposed Project.

AG-12

10. "The Gold Gulch Parking Structure Alternative also would result in fewer benefits than the project, as it would resolve fewer pedestrian/vehicular conflicts, ...". The total number of pedestrian/vehicular conflicts appears to be an easy and convenient way to quantify this impact, but it is abused in this document. Some conflicts are necessary and do not create a negative impact if they are properly designed for each individual situation. The analysis of the crossings in Table 191 of the traffic report is inaccurate. One similar crossing in the project is not counted, one of the crossings in the Gold Gulch Alternative could be eliminated as the Proposed Project has done (note: from a pedestrian needs stand point this crossing should be added to the Proposed Project as will be discussed later), and the pedestrian bridge in the alternative was counted as a conflict when there is none. The attached exhibits which show the travel routes for vehicles, pedestrians, bikes and the tram for both the Proposed Project and the Gold Gulch Alternative demonstrate where conflicts and interaction will occur (see Exhibits 8 & 9). This will be discussed in more detail later in this response.

AG-10 It is acknowledged that the alternative structure would export less soil than the project and may decrease or eliminate the time parking is temporarily reduced; however, the project's soil export and temporary parking effects would not result in significant project impacts.

See response to comment AG-5.

AG-11 It is acknowledged that the Gold Gulch Alternative would only have an increased distance of 132 feet.

The Gold Gulch Parking Structure Alternative in the EIR would include the same number of parking spaces as the proposed project (Section 9.3.4Ai.1). The Parking Demand Study (Appendix D-2) found the proposed parking spaces to be adequate to meet the parking demand. Thus, a further increase in parking spaces would not reduce a significant project impact, or meet additional project objectives. Additionally, to allow for an equitable comparison of impacts, the parking structures under all applicable alternatives were assumed to have an equal number of spaces. It is acknowledged that additional parking spaces may be provided with the Gold Gulch alternative.

AG-12 The reduction of pedestrian/vehicular conflicts is a BPMP goal and is an underlying purpose of the project. The pedestrian/vehicle conflict information was determined by a qualified traffic engineer (Appendix D-1) and is included in the alternatives analysis (Section 9.0) to provide a comparison with the project and the ability of the alternative to meet most of the project objectives in compliance with CEQA Guidelines Section 15126.6(f). To clarify, the existing pedestrian/vehicular conflicts are not considered impacts of the project or the alternatives.

The Gold Gulch Alternative includes a grade-separated pedestrian bridge connecting the new park area unencumbered to the rear of the Organ Pavilion, thus removing a total of 11 pedestrian-vehicular conflicts, compared to the 14 resolved by the project. Because neither the project nor the Gold Gulch Alternative would increase the number of pedestrian/vehicular conflicts over the existing condition, impacts associated with traffic hazards would remain less than significant for both.

AG-13

The Gold Gulch Parking Structure Alternative (Alt 4Ai) is addressed again in Chapter 3 under Project Description. As with the Conclusions Section of the DEIR already discussed, many items were misrepresented, under represented or not included in this section. Items already discussed above will not be repeated unless further detail is necessary due to the verbiage used in the DEIR.

1. *"The Gold Gulch Parking Structure Alternative would not avoid any of the project's significant and unmitigable impacts, and would result in additional potentially significant unmitigable impacts to visual resources (public views, architectural character, landform alteration) due to the location of the parking structure within Gold Gulch, the necessitated landform alteration, and removal of CMPP Significant Trees."*
There would be potentially significant impacts on visual resources, but it is misleading to imply that they would be unmitigable as demonstrated in the attached sight line study (see Exhibit 10). The Gold Gulch concept would "hide" the parking structure in the canyon making it more removed from vehicular views than the Proposed Project. Vehicles and pedestrians on the Park Road would only see the top of the parking structure which would be a minimal visual impact. The only vehicles and pedestrians who would have a view of the parking structure would be on the Park Road West, and most of their view would be screened by landscaping. The new park land created with this alternative is over twelve feet higher than the structure, and there would be substantial landscaping between the two uses. The only park uses which would be directly affected by a view of the Gold Gulch structure would be the Japanese Friendship Garden and Pepper Tree Park. Most of the view of the structure from the Japanese Friendship Garden would be blocked by the point of land that juts out into the canyon as shown on the sight line exhibit. The only complete view of the Gold Gulch parking structure would be from Pepper Tree Grove on the east side of Gold Gulch canyon. This view would be looking under the tree canopy unless a person was to stand near the canyon edge. Views from both sites would be distant enough that architectural treatments along with landscaping could mitigate the impacts. All the CMPP significant trees affected would be non-native species common to the San Diego area which would be moved or replaced in other landscape areas (see the discussion of the Australian Garden later in this response). The newly created park land would also provide the opportunity to mitigate any lost trees by plant young specifically selected trees which could mature into large trees consistent with the theme of Balboa Parks.
2. *"This alternative would have similar traffic impacts compared to the project in the near-term and in 2030, with one internal roadway/intersection that would operate poorly, resulting in a significant, mitigable impact."*
The only intersection that fails for the Gold Gulch Alternative in the DEIR analysis is the entrance to the Federal Parking Lot on Presidents Way. The mitigation for the Gold Gulch Alternative would be the same as provided by the Proposed Project, i.e. providing a left turn lane within the existing paved area. Also the intersection of Presidents Way and the new

AG-13 The Gold Gulch Parking Structure Alternative is not described in Section 3.0, Project Description, which describes the project. This quotation is provided from the Conclusions.

Impacts to key views associated with this alternative are identified as potentially significant; but not significant and unmitigable in Section 9.3.4Ai.2 and in the conclusions. However, Section 9.3.4Ai.3 misstates that the public view impact would be significant and unmitigated. This error has been corrected in the Final EIR.

The EIR acknowledges that landscaping and project design features relating to screening could partially mitigate impacts to public views. Without project-level detail, the EIR defers a conclusion regarding the ultimate level of significance (except for alternative components identical to those of the project, e.g., the Centennial Bridge). Therefore, impacts associated with public views are identified as potentially significant in Section 9.0, along with the Summary and Conclusions.

AG-14 It is acknowledged that the Gold Gulch Alternative would result in one significant, mitigable traffic impact to the intersection of Presidents Way/Federal-Aerospace parking lot. This information is disclosed in Section 9.3.4Ai and Table 9-4.

AG-15

Park road would be at a LOS D in 2030 for the Gold Gulch Alternative per the traffic analysis. However, the traffic analysis does not properly represent the Gold Gulch Alternative along Presidents Way causing this to be an improper conclusion per the following analysis. Exhibit 18 of the TS (Existing with Proposed Project Total Traffic Volumes (Saturday)) shows 10,974 trips on Presidents Way approaching the intersection with Centennial Road. Exhibit 70 of the TS (2030 with Alternative 4Ai Total Traffic Volumes (Saturday)) shows only 9,800 trips on the same link for the Gold Gulch Alternative. Table 21 of the TS (Existing + Project Intersection LOS Analysis Internal Streets (Saturday)) shows the Presidents Way/Centennial Road Intersection having a worse case LOS C on one movement for the Proposed Project. However, Table 118 of the TS (2030 + Project Alternative 4Ai Intersection LOS Analysis Internal Streets (Saturday)) shows two movements having a LOS D for the Gold Gulch Alternative. It defies logic that when the traffic is less for the Gold Gulch Alternative in 2030 than the Existing + Proposed Project traffic today that the TS would conclude that the Gold Gulch Alternative would have more of an impact. Even though LOS D does not indicate mitigation being required, the report indicates that this intersection would not operate well for the Gold Gulch Alternative. This LOS D result is "manufactured" by the traffic engineer who arbitrarily assigned far more traffic to the Palisades link on Presidents Way in the Gold Gulch alternative. Also, the TS errors by not showing any of the traffic on Presidents Way entering the Gold Gulch parking structure before the intersection which would substantially reduce the traffic going through the intersection.

AG-16

Even more importantly, the TS distributes only 20% of the trips from Park Blvd. to the new Park Road in the Gold Gulch Alternative leaving 80% on Presidents Way. This ignores several logical conclusions as follows:

- i. The intersection of Park Blvd./Presidents Way would operate at a LOS E and F in 2030 both for the Proposed Project and the No Project Alternative per Table 28 of the TS (2030 + Project Intersection LOS Analysis External Streets (Saturday)). No mitigation is required from the Proposed Project since this intersection would fail without the project. What is not addressed is that motorists would want to avoid this delay which would be motivation to use the new Park Road proposed in the Gold Gulch Alternative. Therefore, with the use of standard signage motorists would understand that the second left turn also serves Balboa Park and the parking structure and choose to continue on to the new Park Road to avoid the backup.
- ii. The new Park Road goes directly to the parking structure and would be the shortest way to the new Alcazar Garden drop-off, valet and ADA accessible lot. Residents would quickly understand this and logically use the new Park Road instead of the less direct Presidents Way access. Most tourists should be able to understand

AG-15 The percent distribution of trips to the parking lots for the project (including the Existing + Proposed scenario,) and for the Gold Gulch Alternative is essentially the same. For the peak hour analyzed on a typical Saturday, approximately 25-30 percent was assigned to the parking structure, 30 percent to the Federal parking lot, 25 percent to the Palisades parking lot and 15–20 percent through traffic for both the proposed project and the Gold Gulch Alternative. However, because the travel paths differ between the project and Gold Gulch Alternative, the intersections within the Park would operate differently and produce different results. The results are disclosed in the TIA (see Appendix D-1).

The roadway segments are analyzed based on their average daily trips (ADT) and separate from intersection analysis which is done on a peak hour basis. The traffic analysis methodology for the Gold Gulch Alternative is reasonable based on the trip distributions.

AG-16 The trip distribution used in the TIA (see Appendix D-1) along Park Boulevard at the entrances of Presidents Way and Inspiration Point Way were split following the existing trend, which is that the majority of traffic arrives from the south on Park Boulevard. With the current design of 20 percent entering at Inspiration Point, the internal intersection of the new Inspiration Point Way and Park Road would operate at a level of service D for a typical Saturday peak hour in 2030.

LETTER

RESPONSE

<p>the signs, but it should also be noted that many tourists are brought to the park by residents who would be familiar with this situation.</p> <p>iii. Based on this analysis, assigning only 20% of the traffic from Park Blvd. to the new Park Road is indefensible. A more appropriate assignment would be in the 50% range. Therefore, the Gold Gulch Alternative would mitigate the Park Blvd./Presidents Way intersection to a level of non-significant as an added benefit and further justification for adding a second access from Park Blvd.</p> <p>iv. Since the traffic would be substantially reduced on Presidents Way for the Gold Gulch Alternative using this logic, the intersection determined to fail in 2030 for the Proposed Project at Presidents Way/Centennial Road would operate at even better than the LOS D in 2030 as currently shown for the Gold Gulch Alternative. This improved LOS would occur even with the TS ignoring the garage entrance diversion and arbitrarily increasing the traffic assigned to the Palisades link as pointed out above.</p> <p>AG-17 3. <i>"The Gold Gulch Parking Structure Alternative also would result in fewer benefits than the project..."</i>. This statement is based on no benefit being considered unless it addressed a significant, unmitigable impact for the Proposed Project as identified in the DEIR. The Gold Gulch Alternative would have significant benefits over the Proposed Project and would still meet all the project objectives. Following is a list of the additional Gold Gulch Alternative benefits.</p> <p>AG-18 a) The Gold Gulch Alternative would provide 2.9 acres of new usable park land while the project would provide only 2.2 acres. More importantly, the 2.9 acres could be used in any manner desired and would not limit any options 20, 50 or more years from now. The Water & Transportation Building that occupied the site in the 1935 Exposition could even be rebuilt: not an option with the Proposed Project.</p> <p>AG-19 b) The additional access from Park Blvd. would mitigate for two intersections which would otherwise operate at an unacceptable LOS in 2030. The second access would become even more important when special, or unexpected, park activities required the closing of the Cabrillo Bridge because it would allow traffic to continue to use the park in an orderly fashion by dispersing the vehicles.</p> <p>AG-20 c) The Gold Gulch Alternative would separate the vehicles, pedestrians and trams. This would allow the trams to operate much more safely and at an increased speed.</p> <p>d) During construction there would be substantially less impact from the noise, air pollution, traffic disruption and inconvenience to park visitors. 64% less soil would be exported and the Organ Pavilion parking lot would continue to operate until the new parking structure was completed thereby avoiding the cost and inconvenience of visitors having to park in remote lots and taking a tram to their destination.</p> <p>6</p>	<p>AG-17 Comment noted.</p> <p>AG-18 Although a second access on Park Boulevard would give options to drivers, it would not fully mitigate internal circulation. The vehicles may have different travel paths but their destinations (parking lots, garage etc.) would remain the same.</p> <p>AG-19 See response to comment AG-12. Based on the provided Exhibit 8, there is only one grade separated pedestrian crossing, still leaving 11 conflict areas compared to 6 with the project.</p> <p>AG-20 It is acknowledged that the alternative structure would export less soil than the project and that the corresponding impacts would be incrementally reduced. However, the EIR concluded the project would not result in a significant impact for noise (construction phase hauling), air pollution, and traffic related to hauling. The noise level generated by the hauling trucks would be less; however, the significant project impact related to construction equipment noise would not be substantially lessened by reduced soil export, as the same equipment would be required to construct the parking structure, and interior noise levels at Park uses due to this equipment would exceed the 45-decibel (db) interior noise threshold.</p>
--	---

LETTER

RESPONSE

<div data-bbox="111 287 205 319">AG-21</div> <div data-bbox="390 279 896 639"> <p>e) The Gold Gulch Alternative would be much more sustainable since it would be open on two opposite sides so mechanical ventilation and fire sprinklers would not be needed. The design team keeps stating that the Proposed Project will not require mechanical ventilation based on the east side being exposed, ventilation shafts being added on the south end and roof openings for the palm trees being provided at the rear. They are incorrect because ventilation on two adjacent sides of a parking structure is not sufficient to eliminate mechanical ventilation in a parking structure which is 191 feet deep and 476 feet long. Their solution for naturally ventilating the rear portion of the proposed parking structure is to have openings for the palm trees which would be planted on parking level 2 as shown on the parking structure plan view. (Note: the parking structure section shows the trees being planted on level 3 – see Exhibit 11, shts. 1 and 2). In either case, the level 1 and basement section would not have ventilation at the tree wells.</p> </div> <div data-bbox="111 633 207 664">AG-22</div> <div data-bbox="390 639 896 977"> <p>f) The Gold Gulch would have top deck shade structures with photovoltaic collectors for the structure lights and to charge the trams. The parking structure could also have awning photovoltaic collectors on the south side due to the structures orientation and exposure to sunlight if calculations show that these additional panels are necessary to meet all the electrical demand for both day and night. The Proposed project proposes photovoltaic collectors in the trellis structures near the elevator (see Exhibit 12, shts. 1 to 3)). The proposed design, which is based on historical trellises in the park, shows the panels lying flat so they do not destroy the character of the area. Unfortunately, these panels need to be installed at an angle between 30 and 45 degrees from horizontal to be effective. Also, there is not nearly enough trellis area to accommodate the number of panels which would be required to meet the night time needs of the proposed parking structure.</p> </div> <div data-bbox="105 979 203 1011">AG-23</div> <div data-bbox="390 977 896 1167"> <p>g) The Gold Gulch Alternative would not have long term maintenance issues with a planted roof. Even when state of the art systems are used, water would be persistent and eventually require remedial work which could be quite expensive as well as disruptive. Trees in planters require careful watering and are unlikely to survive a drought unless normal watering is continued, as opposed to trees planted in natural ground which have a much larger reservoir to draw from and are therefore much more tolerant of drought conditions.</p> </div> <div data-bbox="96 1177 195 1208">AG-24</div> <div data-bbox="390 1167 896 1252"> <p>h) The new park roads would have a design speed of 30 mph (they could be safely posted up to 25 mph if use so dictated), although it is anticipated that a 15 mph speed would be posted. Traffic calming methods would be needed, but if they were</p> </div>	<div data-bbox="1050 290 2005 414"> <p>AG-21 The proposed parking structure would provide open areas on two sides, and would thus meet the open area and aggregate length requirements of the 2010 California Building Code to provide natural ventilation and to be considered an open parking structure.</p> </div> <div data-bbox="1050 625 2005 870"> <p>AG-22 The proposed solar collectors would be photo voltaic (PV) panels. They are specifically designed to be installed at a 5 percent angle. The number of PV panels is not based on the electrical needs of the parking structure, but rather the roof/trellis area available to install them. The PV panels are intended to lessen the electrical demand of the parking structure, not eliminate that demand. The proposed solar panels would be incorporated into the roof/trellises so they would not be highly visible to the public or impact the character of the area.</p> </div> <div data-bbox="1050 959 1354 990"> <p>AG-23 Comment noted.</p> </div> <div data-bbox="1050 1192 2005 1437"> <p>AG-24 The existing and proposed speed limit for the Park roads is 15 mph. It is acknowledged that the Park roads for the project would deviate from the standard commercial street due to the road widths and curvatures, but have been approved by the City Development Services Engineering Department. The roadway geometry would naturally calm traffic speed, due to the curves; however, 14-foot travel lanes would be provided to allow for safer turning movements and vehicular passage. The lanes travelling under the pedestrian overpass would be 14-foot travel lanes.</p> </div>
--	---

LETTER

RESPONSE

<p>AG-25 ignored there would be much less chance of a dangerous situation being created. The Proposed Project attempts to calm traffic by using tight radius curves, narrow tunnels and mixing bicycles with vehicles. These methods are dangerous and not a good way to slow down traffic.</p> <p>i) The Gold Gulch Alternative road would have bike lanes to avoid the dangerous mixing of bikes and vehicles. This situation currently occurs in the park and would continue to happen with the Proposed Project. Many bikes do not want to travel as fast as 15 mph, especially when they are enjoying the park surrounding. This leads to frustrated motorists who might try to pass them on the dangerous curves in the Proposed Project design for Centennial Road.</p> <p>AG-26 j) The Gold Gulch parking structure could be expanded to the south in the future with minimal impact to the proposed road system. Twenty or fifty years from now the public may want to have additional proximate parking without having a major impact on Balboa Park. There are no obvious ways to expand the Proposed Project parking structure without making major modifications.</p> <p>AG-27 k) Gold Gulch Canyon is an area of Balboa Park which has been neglected and under utilized. It was totally disturbed by the past Exhibitions and contains no sensitive vegetation, although it is the location of the Australian Garden which will be discussed in detail later in this response (see Exhibit 13). This alternative would trade this "under utilized" area for 2.9 acres of extremely valuable new usable park land at the center of Balboa Park (see Exhibits 1 & 2).</p> <p>AG-28 In Chapter 3 section 3.4.6.4 of the DEIR the operation of hauling the proposed 142,000 cubic yards (roughly 10,400 truck hauls) of export is discussed. It is indicated that double-bottom dump trucks will be used with a cycle of every 45 to 60 minutes. The DEIR states the Arizona Landfill dump site is 0.5 miles from the Organ Pavilion parking lot site. This may be as the crow flies, but not along the proposed haul route which would be 2.5 miles from project exit to dump site entrance. The 2.5 mile one way haul route would make a right turn onto Zoo Place from Park Blvd; a 180 degree turn which could not be made by these trucks without going outside the lanes. Attached are diagrams showing the truck turning diagram superimposed on this intersection for turning from the outside lane and also from the inside lane which would be possible if the outside lane of Park Blvd. was blocked off (see Exhibits 14 & 15). The trucks would then descend to Florida Canyon on a steep grade which would require very slow speeds and the use of the air brakes on the fully loaded trucks. The lower two-thirds of Zoo Place is only 27 feet wide with guard rails so there is no place to pull over if necessary.</p> <p>AG-29 This would not be a safe or practical route; therefore, the trucks would likely have to continue north on Park Blvd. until they reached Morley Field Drive where they could easily make a right turn. This means the trucks would be interacting with both entrances</p>	<p>AG-25 Comment noted. Per the City of San Diego 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 bikes in the plazas and promenade, which would be the preferred route for cyclists looking for a slow Park experience.</p> <p>AG-26 Comment noted. As indicated in the EIR and the Traffic Impact Analysis (see Appendix D-1), Balboa Park parking is adequate and expansion of the proposed parking structure is not anticipated to be necessary. It is acknowledged that a parking structure at the Gold Gulch location could be expanded in the future if desired.</p> <p>AG-27 Comment noted.</p> <p>AG-28 Section 3.4.6.4 has been revised to indicate the proposed haul route is 2.5 miles. To confirm the feasibility of the proposed haul route, the applicant has consulted a professional hauling company who has utilized double bottom dump trucks, and has driven the exact route with previous Balboa Park projects. The contractor has made the right turn without impacts to adjacent travel lanes, using a double bottom dump. See Attachment A.</p> <p>AG-29 See response to comment AG-28. The proposed haul route is feasible and would most likely be used at night to reduce impacts. The alternate route suggested would not be used.</p>
--	---

LETTER

RESPONSE

Attachment A



Friday, April 06, 2012

George McCarroll
F.J. Willert Contracting Co., Inc.
1869 Nirvana Avenue
Chula Vista, CA 91911

George,

As you requested, I went up to Balboa Park and investigated the haul route from the parking lot off of President's Way to the East Mesa area of the park off Pershing Drive.

The proposed route:

President's Way to Park; Park to Zoo Place; Zoo Place to Florida; Florida to Pershing
Pershing to dump Site.

I am certain the proposed route works as long as you utilize Double Bottom Dumps. I have used this route before on previous jobs. (Tiger River and Polar Bear Exhibits) Bottom Dumps do not need any more room to complete turns than most full size cars however I would be concerned about the turn from Park Blvd north bound to zoo place in any other type of equipment.

I would also suggest doing this haul at night. It would be much safer, avoiding the heavy tourist traffic in the park and around the zoo. Also a night haul will increase production and lessen the number of shifts required to complete the haul.

Please let me know if I can be of further assistance in planning this project.



Bruce Denny
Project Manager
619-415-6064
bdenny@dispatchtrans.com

LETTER

RESPONSE

AG-30 to the San Diego Zoo and the main entrance to Roosevelt Middle School. At the bottom of Morley Field Drive they would make a right turn onto Florida Drive and then proceed as previously described in the DEIR. The total one way distance to the entrance of the main disposal site from the project site would then be 3.4 miles.

The DEIR examines this activity and determines that it would not exceed any of the limits for noise and air pollution, nor would it create a safety hazard. Obviously the proposed turn at Zoo Place would create a dangerous situation which was overlooked. Since the new probable route as described above would actually be longer and pass by the main entrance to a school and both zoo entrances, it needs to be further reviewed, especially considering the number of trips required and the extent of the work day proposed.

The Gold Gulch Alternative would reduce the amount of soil hauled on this route by 64 percent. This would substantially reduce the impacts of the soil hauling operation even if the impacts for the new route are determined to not exceed the level of significance thresholds for the Proposed Project.

AG-31 The reduced amount of soil exported by the Gold Gulch Alternative would also reduce the impacts at the Arizona landfill. Much less of the disposal site would be needed for the 51,400 cubic yards hauled from the Gold Gulch Alternative versus the 142,000 cubic yards hauled from the Proposed Project. Larger buffers from sensitive habitat could be created, less methane gas collecting facilities would have to be replaced, current operations would be less impacted, less noise and air pollution would be created, less fuel would be used and the East Mesa archery range and former "casting ponds" sites could be eliminated. The haul route from the main disposal site entrance to these other two sites would be an additional 1.0 mile one way.

AG-32 The following addresses Section 9.3.4Ai (Gold Gulch Parking Structure Alternative) in the DEIR. The first area is the description of the Gold Gulch Parking Structure Alternative in Section 9.3.4Ai.1.

1. "The parking structure would be a five-level, 798-stall structure, resulting in a net increase of 273 additional parking spaces." This statement is incorrect. The Gold Gulch parking structure would have 953 stalls resulting in a net increase of 428 additional parking spaces, 155 more than the proposed project.

AG-33 2. "The parking structure would be located approximately 1,406 feet from Plaza de Panama, approximately 400 feet further than the Organ Pavilion parking structure included by the project." As stated earlier, the distance from the project parking structure elevator to the north side of the Organ Pavilion would be 651 feet (see Exhibit 7). The distance to the same location from the Gold Gulch elevator would be 783 feet, an insignificant difference of 132 feet. The remaining distance is irrelevant for comparison purposes, although it does emphasize the importance of the tram for both projects. The Gold Gulch Alternative would provide a tram system which would not interact with pedestrians until reaching the Esplanade, thereby providing a faster and safer system for transporting people to the Plaza de Panama.

AG-34 3. "Park Road would have two-way traffic, a bike lane, and walkway." The Park Road proposed in the Gold Gulch Alternative would have a 12 foot

AG-30 As indicated in response to comment AG-28, the use of Zoo Place as a part of the haul route would not result in a traffic safety hazard. It is acknowledged that the reduced amount of soil hauling associated with this alternative would reduce air quality, noise, and greenhouse gas emissions. See response to comments AG-5 and AG-10.

AG-31 As indicated in the EIR, the Gold Gulch Parking Structure Alternative would reduce soil export disposal at the Arizona Street Landfill. The soil export disposal area within the southern portion of the Arizona Street Landfill would be similar to the project due to the need to deposit soil export uniformly to retain existing drainage patterns. The fill depth at the Arizona Street Landfill would be reduced by approximately half. Soil export deposited at the casting pond and archery range would be eliminated. Similarly, this alternative would reduce the soil export depth, and the archery range and casting pond sites would not be needed.

AG-32 As addressed in the EIR, the Gold Gulch Parking Structure Alternative in Section 9.3.4Ai would include the same number of parking stalls as the project. See response to comment AG-11.

AG-33 Comment noted.

AG-34 Comment noted.

LETTER

RESPONSE

AG-35

- wide lane with a 5 foot wide bike lane in each direction which would be much safer than the Proposed Project which would have the bikes sharing a 14 foot wide lane with the vehicles. Park Road West would only have a sidewalk from the elevators to Presidents Way, and Park Road from the elevators to Park Blvd. which would provide improved pedestrian access to the easterly portions of Balboa Park and Gold Gulch canyon by elevator. The walkways would be accessible from the parking structure only from the lower levels by stairs and elevators. Therefore, there would be only one pedestrian/vehicle conflict at the proposed stop intersection of Park Road and Park Road West.
4. *"The dedicated Tram Way would be a grade-separated road that begins at Presidents Way and traverses northeast and under Park Road (towards the Organ Pavilion)."* Attached is a diagram showing the vehicular, tram, bike and pedestrian paths for the Gold Gulch Alternative (see Exhibit 8). These uses would be separated for safety and operational reasons. People would board the tram at the second level down in the parking structure removed from all other conflicts. All the vehicles would be on the top level on the Park Roads, so there would not be any dangerous interaction while people waited for and boarded the tram. Pedestrians could choose to walk all the way to the Esplanade or the Palisades area without ever having a conflict with vehicles or trams.

AG-35 Comment noted.

AG-36

A second area of the DEIR needing a response is the environmental analysis of the Gold Gulch Parking Structure Alternative in Section 9.3.4Ai.2.

- a) *"a. Land Use-Issue 1: Development Standards"* The Gold Gulch Alternative analyzed in the DEIR includes the Centennial Bridge and would have the same impacts as the proposed project. However, it should be noted that the Gold Gulch Alternative would also work without, or prior to, the bridge being constructed.
- b) *"c. Visual Effects and Neighborhood Character - Issue 2: Neighborhood Character/Architecture"* The Australian Garden mentioned in this section consists of plants which are common throughout Southern California, but they are significant in that they were a gift from another country and because they are mature. Unfortunately, the DEIR misrepresents the significance of the Gold Gulch Alternative impacts on this area as will be elaborated on in the following.

AG-36 Comment noted.

AG-37

- 1) *"While half of this garden has been incorporated into the Japanese Friendship Garden..."* The Japanese Friendship Garden destroyed approximately one-half of the Australian Gardens and only appears to have preserved the *Hakea petiolaris*, a "Significant Tree" per the Central Mesa Precise Plan (CMPP).
- 2) *"...including some trees that grow in no other location in Balboa Park: Acacia pendula, Casuarina stricta, Casuarina cristata, Hakea spp., Banksia spp. and a large Erythrina x sykesii."* The *Erythrina x sykesii* can be found on North Park Blvd. per the book "Trees and Gardens of Balboa Park" by Kathy Pupilava, Balboa Park Horticulturist and Paul Sirois, Park Arborist. The other trees may not be

AG-37 1) Comment noted.

2) The quoted text has been removed from Section 9.0 of the EIR.

LETTER

RESPONSE

<p>found in Balboa Park, but they can be found in other areas of San Diego County and are not listed as "Significant Trees" in the CMPP.</p> <p>3) "Several of the trees within Gold Gulch are identified as CMPP "Significant Trees" (Grey Corkwood, <i>Erythrina plebiocarpa</i>; Sea Urchin Hakea, <i>Hakea petiolaris</i>; and Coast Live Oak, <i>Quercus agrifolia</i>). In the CMPP the <i>Erythrina plebiocarpa</i> is listed as a single species that is moveable; the <i>Hakea petiolaris</i> is listed as a tree to save (which could only be done by moving, although this is not listed as an option); and the <i>Quercus agrifolia</i> are shown to have 25 species, many of which would not be affected, but even so they are also listed as "movable".</p> <p>4) "Additionally, this alternative would include the construction of a new roadway between the World Beat Center and the Cultural de la Raza. Construction of this road would impact a rare Fig Tree, <i>Ficus radulina</i>, identified as a "Significant Tree" by the CMPP, resulting in a potentially significant impact." This tree could be impacted by the proposed construction with the additional lane added to Park Road. It may be preserved by providing a small retaining wall, but if not it is also listed as movable in the CMPP should that become the desired mitigation.</p> <p>5) "Fifteen Sugar Gum, <i>Eucalyptus cladocalyx</i>, four newly planted pines, and a camphor tree also would be potentially impacted by construction of the roadway. These trees, though rare, are not Significant Trees, and impacts to these specimens would be less than significant." The impacts would be less than significant because they are not "rare" trees as misstated here. They are very common throughout the park and southern California.</p> <p>c) "c. Visual Effects and Neighborhood Character - Issue 3: Landform Alteration: Therefore, impacts associated with landform alteration are significant and unmitigable for this alternative and greater than the project." The issue is with the claim that the impacts are "greater than the Proposed Project". The Proposed Project would be within a current parking lot area, but it would significantly modify the landform. It is down played in the DEIR, but significant landform alterations on the east and south side of the structure would be visible from the vehicles on Centennial Road and Presidents Way at several locations. Man made slopes at a ratio of 2.5 to 1 and as high as 22 feet would be created. Also, vehicles would enter a 170 foot long "tunnel" under the roof top park created between retaining walls and the parking structure on the trip through the park (see Exhibit 14). These types of impacts would be as significant, if not more so, than the landform impacts from the Gold Gulch Alternative.</p> <p>d) "d. Transportation/Circulation and Parking</p> <p>1) "Issue 1: Traffic Capacity - In 2015, the Gold Gulch Parking Structure Alternative would have a total of five intersections and roadway segments that operate poorly." The Gold Gulch Alternative would actually have a total of four intersections and roadway segments that operate poorly, one less than the Proposed Project. The intersection of Park Blvd./Presidents Way in the AM will</p>	<p>AG-37 (cont.)</p> <p>3) Comment noted.</p> <p>4) The fig tree is identified as moveable by the CMPP; impacts to this tree would be less than significant. This has been clarified in Section 9.0.</p> <p>5) Section 9.0 has been revised accordingly to clarify that the 15 sugar gum, eucalyptus cladocalyx, 4 newly planted pines are not rare trees and impacts would be less than significant.</p> <p>AG-38 As described in Section 4.3, Issue 3, the majority of the existing landform affected by the Centennial Road and the Organ Pavilion Parking Structure is not natural, but is a result of grading that occurred in conjunction with the development of the Park. Retaining walls are utilized to reduce grading and allow for the protection of natural landforms and ESL slopes located within Palm Canyon.</p> <p>AG-39 See response to comment AG-16. The traffic analysis methodology for the Gold Gulch Alternative is reasonable and correct based on the trip distribution.</p> <p>As indicated in Section 9.3.4Ai.2d, five intersections would operate poorly under the year 2015 plus Gold Gulch Parking Structure Alternative conditions and the Gold Gulch Parking Structure Alternative would have a significant but mitigable impact at one of these locations. Not noted in this comment is the additional significant and unmitigable impact that may occur at Park Boulevard/Inspiration Way if the constraints posed by the existing buildings make the Gold Gulch Parking Structure Alternative entrance improvements infeasible (see Section 9.3.4Ai.2d). As noted previously, Section 3.0 discussed the project and not this alternative.</p>
---	--

LETTER

RESPONSE

AG-40

operate at a LOS D for the Proposed Project. This intersection will not operate poorly with the addition by the Gold Gulch Alternative of a second access from Park Blvd. as discussed previously in this response in the Chapter 3 – Project Description section.

- 2) "Existing structures, including the Veteran's Memorial located east of Park Boulevard, and the World Beat Cultural Center west of Park Boulevard, could make the improvement infeasible; in which case, potentially significant traffic impacts could occur at the intersection of Park Boulevard/Inspiration Way." We detect a bias on the traffic engineer's part to portray the Gold Gulch Alternative in a negative light. For example, Table 199 in the Traffic Impact Analysis has the following foot note. "Note: This intersection operates at LOS B from a traffic capacity standpoint but physical constraints (i.e. existing structure/buildings) would deem this relocated intersection significant and potentially unmitigable." As illustrated in the attached Exhibit 6, it is likely that this configuration can be mitigated and certainly is not physically restrained by existing buildings or structures. The traffic engineer should have reserved his comment to the fact that the intersection will operate at a LOS B. Actually, if the traffic engineer had properly distributed the traffic on Park Blvd. as discussed previously, it is likely the intersection would operate at a LOS C in 2030. Any potential impact regarding the surrounding uses should be discussed in other sections of the DEIR: not by a traffic engineer in the technical analysis; especially when he then incorrectly eliminates it from consideration.

AG-41

- 3) "In 2030, the Gold Gulch Parking Alternative would have a total of thirteen intersections and roadway segments that operate poorly." One less intersection in the Gold Gulch Alternative would operate poorly with the addition of a second access from Park Blvd. as discussed previously in this response in the Chapter 3 – Project Description section.

AG-42

- 4) "Issue 2: Circulation and Access – Impacts to circulation and access under this alternative would be less than significant, similar to the project." The two accesses from Park Blvd. proposed in the Gold Gulch Alternative would improve the internal circulation in the park over the existing and Proposed Project concept. Directions to the park on the Balboa Park web site could emphasize the Park Blvd. entrances instead of the Laurel Street entrance as currently done. During major events, or due to unforeseen circumstances, when the Cabrillo Bridge is closed there would still be two vehicular accesses to the park substantially reducing the traffic impacts which would be experienced with the existing configuration and the Proposed Project.

AG-43

- 5) "Issue 4: Traffic Hazards – Thus, like for the project, traffic hazards associated with this alternative would be less than significant." There are only minor traffic design concerns with the Gold Gulch Alternative; however, there are many major design concerns relative to traffic safety for the Proposed Project due to the proposed layout as explained below.

AG-40 See response to comments AG-7, AG-15, and AG-16.

AG-41 See response to comments AG-16 and AG-39.

AG-42 See response to comment AG-18. The internal intersections of the new park road for this alternative (Inspiration Point Way extension)/Centennial Road, Presidents Way/Centennial Road, El Prado/Centennial Bridge would all operate at a LOS D in year 2030 and Presidents Way/Federal parking lot at LOS F. With the proposed project only one intersection would operate at LOS D (El Prado/Centennial Bridge) and one intersection at LOS F (Presidents Way/Centennial Road) in the year 2030.

AG-43 The project is designed based on a 15 mph design speed since it is expected to have a 15 mph posted speed limit. Based on a 15 mph design, the stopping sight distance is 80 feet per Table 3.1 of *A Policy on Geometric Design of Highways and Streets, AASHTO 2011*. Similar to the Gold Gulch Alternative, the project would meet the minimum design requirements for the 15 mph speed limit.

LETTER

RESPONSE

- AG-44
- AG-45
- AG-46
- a. The Proposed Project assumes a 15 mph speed limit will be posted and adhered to. From an operational standpoint it is unrealistic to think that cars will never exceed the 15 mph speed limit, especially on a road which will not have pedestrian conflicts. When pedestrians are not interacting with the traffic, vehicles today often exceed the existing 15 mph speed limit primarily because this is a very difficult speed limit to obey with today's vehicles. The curve at the most easterly corner of the proposed parking structure has been designed with a stopping sight distance design speed of 22 mph (see Exhibit 17). Using normal design standards which assume the prima fascia speed plus 5 mph, this design is adequate for a posted speed of 17 mph. In other words, even a car going 25 mph would not be able to stop safely if the cars were backed up attempting to enter the first garage entrance they could use as they approached from the west. It is likely that this situation would occur because the neck to the garage entrance would be very short and there would not be a dedicated turn lane for the garage. When you include the bicycles, which would be sharing the lane with the cars, a very dangerous situation would exist. These deficiencies with the Proposed Project are not an issue with the Gold Gulch Alternative which would have a design speed of 30 mph that provides a factor of safety for the 15 mph posted speed limit.
 - b. The new tie in location for the existing access road to Gold Gulch canyon with Centennial Road violates most of the rules for good intersection design (see Exhibit 18). It would be offset from the parking structure entrance driveway, thereby expanding the length of the intersection and creating a very confusing situation since the lanes would not align properly. It would also create a conflict with the left turn lane into the parking structure and the opposing left turn to the Gold Gulch access road.
 - c. One of the major turn movements at the intersection of Centennial Road and Presidents Way would be the south left from Centennial Way onto east bound Presidents Way, especially when vehicles are leaving from a major event. The traffic from the most northerly parking structure exit would be conflicting with the traffic trying to leave from the southerly exit. Also, if any bikes get involved with this mess a potentially dangerous situation would exist. Conversely, it should be noted that the Gold Gulch Alternative has a very safe and non-confusing directional entrance and exit design. Please also note that an additional west bound lane on the proposed Park Road at Park Blvd. has been added to allow U-turns and to increase the length of the dedicated lane entering the parking structure.
 - d. *"However, the Gold Gulch Structure Alternative would provide slightly fewer benefits because it would remove*

AG-44 The existing access driveway into Gold Gulch carries very minor traffic volumes and would carry minor traffic volumes, less than 10 vehicles, during a Saturday peak hour with the proposed project. No conflict would occur with opposing left turn lanes, as both driveways from Gold Gulch and parking structure would be stop controlled.

AG-45 Queuing analyses along Centennial Way show that exiting movements at the proposed parking structure's southerly driveway would not conflict with the northerly driveway. No traffic conflict or hazard is anticipated to occur as a result of the project.

Depending on the size and attendance of a major special event, additional traffic control measures may be a condition of the event permit and implemented like existing special events are managed today.

The Gold Gulch access driveway carries minor traffic volumes, less than 10 vehicles during a Saturday peak hour. No conflict would occur with opposing left-turn lanes, as both driveways from Gold Gulch and the proposed parking structure would be stop controlled.

Comment noted.

AG-46 As indicated in Section 4.4.5 and 9.3.4Ai, both the project and the Gold Gulch Parking Structure Alternative would have a less than significant impact related to traffic hazards. To clarify, the intent of the quoted text was to discuss the extent to which this alternative would meet the objective of reducing pedestrian/vehicular conflicts compared to the project. See response to comment AG-12.

LETTER

RESPONSE

only 10 of the 20 existing pedestrian/vehicular conflict areas as compared to 14 for the project.” Item 10 of this response regarding the Conclusions Section of the DEIR pointed out the inaccuracies in this analysis. However, a more important issue is the convenience of the pedestrian routes and whether the crossing would be safe. All of the conflicts in the Gold Gulch Alternative that differ from the Proposed Project are at stop intersections with clear visibility. The Proposed Project would not provide any pedestrian access to or from the Palm Canyon area except at the Mengei Museum and the International Village, a distance of 785 feet (see Exhibit 19). The project proponent will argue that any pedestrian/vehicle conflict possible must be eliminated, but excluding a pedestrian connection for this distance ignores one of the basic rules of pedestrian circulation design; i.e., pedestrians will go to great efforts to avoid going out of their way. Another reason a crossing is not included in the Proposed Project is that the grade separation of the Centennial Road precludes addressing this issue. The Gold Gulch Alternative is designed so that pedestrians can cross from the Organ Pavilion to Palm Canyon, an added conflict that could be eliminated, but one that would be beneficial to park visitors. A stop sign at this location would make the crossing safe for pedestrians and provide traffic calming on the proposed Park Road.

AG-47

e) “e. Air Quality – Issue 1: Plan Consistency” Impacts would be less than significant for both this alternative and the project.” This is a correct statement; however, the Gold Gulch Alternative would have substantially less air quality impacts during construction and during operation. The more efficient traffic circulation pattern, reduced construction emissions and the mitigation of an intersection which would otherwise operate at LOS F would reduce impacts to air quality.

AG-48

f) “Energy Conservation – Issue 1: Energy Use. Long-term operational energy use associated with the consumption of electricity and natural gas, water, solid waste, and vehicle use would be less than significant for both the project and this alternative.” The Gold Gulch Alternative would incorporate photovoltaic collectors in the top deck shade structures and south side awnings which would fit with the parking concept and not be aesthetically undesirable since they would not be viewed from most park lands. This installation would be able to power the structure, and probably the trams completely. The Proposed Project proposes photovoltaic collectors on the trellis structures associated with the roof top park. It is going to be difficult, if not impossible, to incorporate these facilities into this area without ruining the garden concept as discussed previously (see Exhibit 12, shts. 1 to 3). Even if the panels can be incorporated, they would not have the capacity to provide the power needed at night. Also, the Proposed Project parking structure

AG-47 As concluded in Section 9.3.4Ai, the Gold Gulch Alternative would result in lesser construction impacts associated with air quality which is attributed to the lesser extent of soil export than under the proposed project.

The intersection of Park Boulevard and Presidents Way would still operate at LOS F in the year 2030 for this alternative as analyzed.

AG-48 See response to comments AG-21 and AG-22.

LETTER

RESPONSE

<p>AG-49 would be enclosed on three sides cutting out most of the natural light to the interior. Therefore, interior lights would need to be used much more, both for the structure and Centennial Road "tunnel", than for the Gold Gulch Alternative structure which is open on two opposite sides.</p> <p>g) "i. Greenhouse Gases – Issue 1: GHG Emissions. Annual operational GHG emissions associated with the Gold Gulch Parking Structure Alternative's energy and water use, and waste disposal would be comparable to the project." The more efficient traffic circulation pattern and the mitigation of an intersection which would otherwise operate at LOS F as provided by the Gold Gulch Alternative would reduce GHG emissions compared to the Proposed Project.</p> <p>AG-50 h) "l. Noise – Issue 1: Noise/Land Use Compatibility. The new parking structure could constitute a new source of noise adjacent to the restored parkland behind the Organ Pavilion and Australian Garden." The Gold Gulch parking structure and the Park Roads would be located more than 12 feet below the new park land and a minimum of 60 feet away, so there would be less noise than exists today at the Organ Pavilion. The Gold Gulch Alternative would have more noise impacts on the adjacent areas of the Japanese Friendship Garden. The Australian Garden would be relocated, or at least elements of it would be incorporated into other areas of the park.</p> <p>AG-51 "9.3.4A.3 Conclusion Regarding the Gold Gulch Parking Structure Alternative" This section is mostly incorrect and needs to be completely rewritten based on the explanations provided in this response. It could be rewritten as follows:</p> <p>a The Gold Gulch Parking Structure Alternative would not avoid any of the project's significant and unmitigable impacts which are associated with the elements common to both the Proposed Project and the Gold Gulch Alternative. The alternative would result in additional potentially significant impacts to visual resources (public views, architectural character, and landform alteration) due to the location of the parking structure within Gold Gulch canyon and the connection to Park Blvd. The Gold Gulch Alternative would substantially reduce other impacts that would exist due to the Proposed Project, or if the No-Project Alternative was adopted.</p> <p>b One of the proposed improvements for this alternative is the modification and realignment of the existing signalized intersection of Park Boulevard and Inspiration Point Way (Stitt Avenue). This alternative proposes to move the existing intersection of Inspiration Point Way and Park Boulevard approximately 100 feet to the south. The existing traffic signal would be removed and a new one constructed to accommodate a new Park Road and realigned Inspiration Point Way at this intersection. The new Park Road would be a second access to the southerly portion of the Central Mesa and serve as one of the two accesses to the proposed Gold Gulch parking structure. This second entrance to the Balboa Park Central Mesa area would mitigate impacts to the intersection of Park Blvd. and</p>	<p>AG-49 As indicated in response to comments AG-16, AG-39, and AG-47, this alternative would have the same traffic impacts as the proposed project and greenhouse gas emissions related to traffic would be the same as the proposed project.</p> <p>AG-50 Noise due to the Gold Gulch parking structure was analyzed (Section 9.3.4.Ai) and it was concluded that noise/land use compatibility impacts would be less than significant.</p> <p>AG-51</p> <p>a See response to comment AG-13.</p> <p>b See response to comments AG-7, AG-18, and AG-42. The proposed realignment and second entrance at Park Boulevard and Inspiration Point Way are design measures associated with this alternatives access issues</p>
---	--

LETTER

RESPONSE

<p>c Presidents Way which will operate at a LOS F for both the Proposed Project and the No-Project Alternative in 2030; yet they do not provide mitigation. The Gold Gulch Alternative would require mitigation for impacts to the open areas near the World Beat Cultural Center, Centro Cultural de la Raza and the Veteran's Memorial Center.</p> <p>d The Gold Gulch Alternative would significantly improve the internal traffic circulation and access to the Central Mesa with the addition of the Park Blvd. intersection. Access for parking and uncongested circulation would still be provided even when the Cabrillo Bridge was closed due to large events or unforeseen incidents. Uncongested access to this portion of the park would be maintained at the same time unlike with the Proposed Project and the No-Project Alternative.</p> <p>e The Gold Gulch Alternative would result in the same significant, mitigable impacts to land use (MSCP), biological resources (raptors, MSCP), historical resources (archaeological resources), and Paleontological resources as the Proposed Project. It would result in much less of a significant, unmitigable impact to noise (temporary construction) than the Proposed Project. Greenhouse Gases would be incrementally less for the alternative construction phase and for annual operations due to being mitigation for the intersection of Park Blvd./Presidents Way which would operate at a substantially better LOS.</p> <p>f The energy needs of the Gold Gulch Alternative would be substantially less than the Proposed Project since internal lighting would be reduced and no ventilation system would be required. All the parking structure energy requirements would be met by photovoltaic collectors mounted on the rooftop shade structures and on the south side awnings. Potentially there would be enough electricity to at least partially power the proposed tram system. The Proposed Project may not be able to incorporate photovoltaic collectors, and even as shown they would only provide power for the structure's daytime use.</p> <p>g The trees planted on the rooftop park for the Proposed Project would have to be in pots which would have limited soil dictating the size and type of trees which could be grown. During drought conditions with the pot limitations it would be much more difficult to conserve water while maintaining the health of the trees. The trees for the Gold Gulch Alternative would have extensive root systems which would not limit their size and also make them much more drought tolerant.</p> <p>h The planted rooftop park would have a state of the art water proofing and drainage system. This might not create maintenance concerns for a number of years, but in the end water always wins as it seeks the path of least resistance. This would be a maintenance issue that the public would not have to risk funding with the Gold Gulch Alternative.</p> <p>i The Gold Gulch Alternative would attain all the project objectives. It is the same as the Proposed Project north and west of the Organ Pavilion. The alternative is proximate to the Park's institutions, although a pedestrian would have to walk an additional 132 feet which would not be significant, especially in light of the speedier and safer tram system incorporated into the Gold Gulch Alternative. Also, the alternative would have an additional 155 parking stalls</p>	<p>c See response to comments AG-18 and AG-42.</p> <p>d Comment noted. See response to comments AG-20 and AG-49 with respect to construction noise, traffic, and greenhouse gas emissions impacts. See Table 9-1 for a detailed comparison of this alternative and the project.</p> <p>e Comment noted.</p> <p>f Comment noted.</p> <p>g Comment noted.</p> <p>h See response to comments AG-1 through AG-3.</p> <p>i See response to comment AG-12.</p>
--	--

LETTER

RESPONSE

<p>j</p> <p>k</p> <p>AG-52</p> <p>which would more than compensate for the stalls lost by reservation for the valet service, thereby effectively providing more proximate parking for the public. It would also be relatively easy to expand the Gold Gulch parking structure should it be concluded in the future that more proximate parking is necessary.</p> <p>The total number of pedestrian/vehicular conflicts is not an accurate way to analyze the impact. The Gold Gulch Alternative provides a similar pedestrian system as the Proposed Project with each having their positive and negative aspects. When the elements of safety and desirable routes are incorporated into the analysis, the conclusion is both projects would be similar.</p> <p>The Park Road in the Gold Gulch Alternative would have a much safer design than the Proposed Project. The higher design speed would allow for driver errors in judgment and a lack of attention which is likely in a park setting. There are no intersections and parking structure entrance/exit concerns with the alternative as opposed to the Proposed Project which has many. Bike lanes would be delineated in the Gold Gulch Alternative providing safe passage for the bicyclists and avoiding frustrated drivers.</p> <p>The Gold Gulch Alternative proposes 2.9 acres of new park land in the study area while the Proposed Project proposes 2.2 acres. What is even more significant is that the Gold Gulch park land would not be constrained by being on the top of a parking structure. Therefore, future generations would be free to implement whatever improvements the public feels are appropriate for Balboa Park at the time. The Proposed Project dictates to the public that the site of their parking structure in the heart of Balboa Park will always have very limited rooftop uses. In 20, 50 or more years from now with the Gold Gulch Alternative the public would not be irrevocably bound by the decisions made today.</p> <p>In conclusion, the Gold Gulch Alternative would meet all the project objectives while providing many significant benefits and substantially reducing impacts which would be incurred with the Proposed Project. Even though most of the Proposed Project impacts are considered non-significant based on a comparison with the No-Project impacts, they still are a concern that would have to eventually be addressed by the City of San Diego. The Project Proponent has stated numerous times publicly that he would not oppose any alternative which meets the project objectives. The Gold Gulch Alternative is a much better choice for the public, both in the short term and definitely in the long term, who are the true stewards of Balboa Park. For these reasons the Gold Gulch Alternative concept should be incorporated into the Proposed Project.</p> <p>I look forward to receiving your reply to my response regarding the DEIR.</p> <p>Sincerely;</p> <p>Ricardo Bazan, P.E. 2352-1/2 3rd Avenue San Diego, CA 92101</p> <p>17</p>	<p>j</p> <p>k</p> <p>AG-52</p> <p>See response to comments AG-1 through AG-3.</p> <p>Comment noted.</p> <p>Comment noted.</p>
---	---

LETTER

RESPONSE

Attached Exhibits:

1. Gold Gulch Alternative Grading Plan
2. Aerial Photograph with Gold Gulch Alternative Overlaid
3. Floor Plans for Gold Gulch Alternative Parking Structure
4. North and South Elevations for Gold Gulch Alternative Parking Structure
5. Aerial Photograph with the Proposed Project & Gold Gulch Structures Overlaid
6. Aerial Photograph with Inspiration Way Realignment Overlaid
7. Pedestrian Paths of Travel Compared
8. Gold Gulch Alternative with Travel Routes Delineated
9. Proposed Project with Travel Routes Delineated
10. Sight Lines to Gold Gulch Parking Structure
11. Trees at Rear of Proposed Parking Structure
12. Solar Panels on Trellises at Rooftop Garden
13. Aerial Photograph with Gold Gulch Alternative Overlaid on Australian Garden
14. Truck Turn Diagram (Outside Lane) at Park Blvd. and Zoo Place
15. Truck Turn Diagram (Inside Lane) at Park Blvd. and Zoo Place
16. Centennial Road Tunnel at Proposed Parking Structure
17. Sight Distance on Centennial Road at NE Corner of Proposed Parking Structure
18. Centennial Road near SE Corner of Proposed Parking Structure
19. Pedestrian Access to and from Palm Canyon

EXHIBIT 1 - GOLD GULCH ALTERNATIVE GRADING PLAN

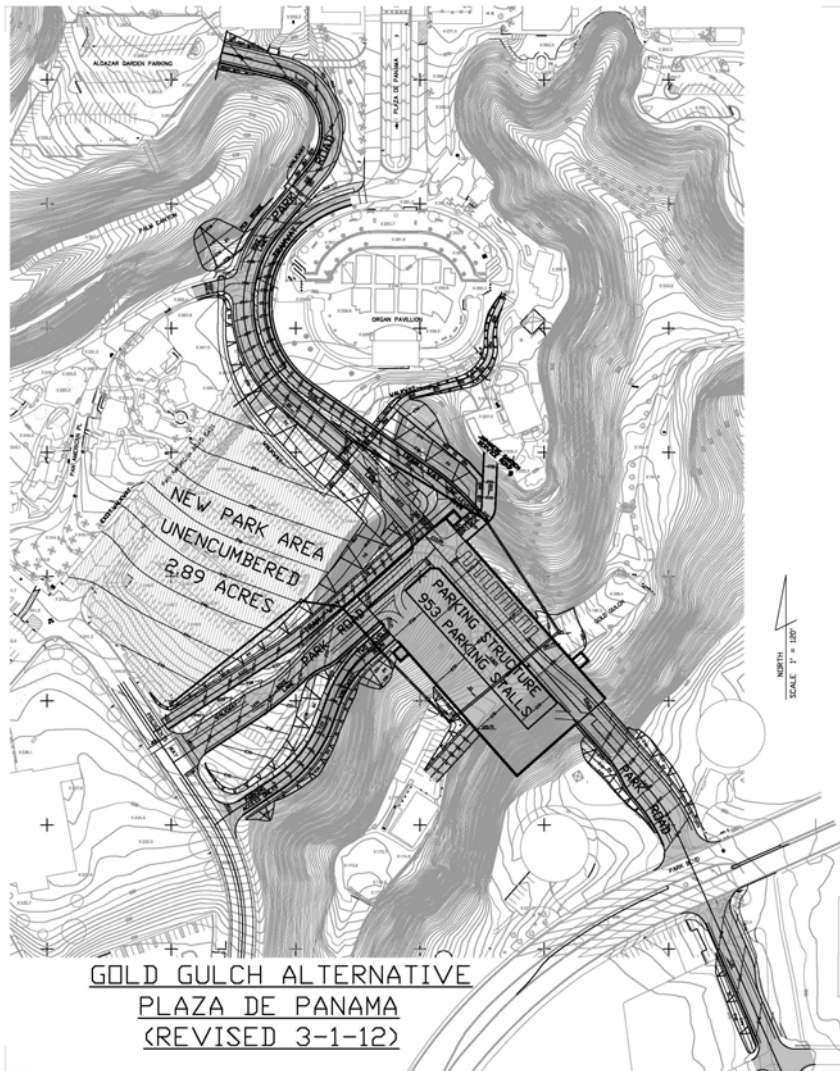
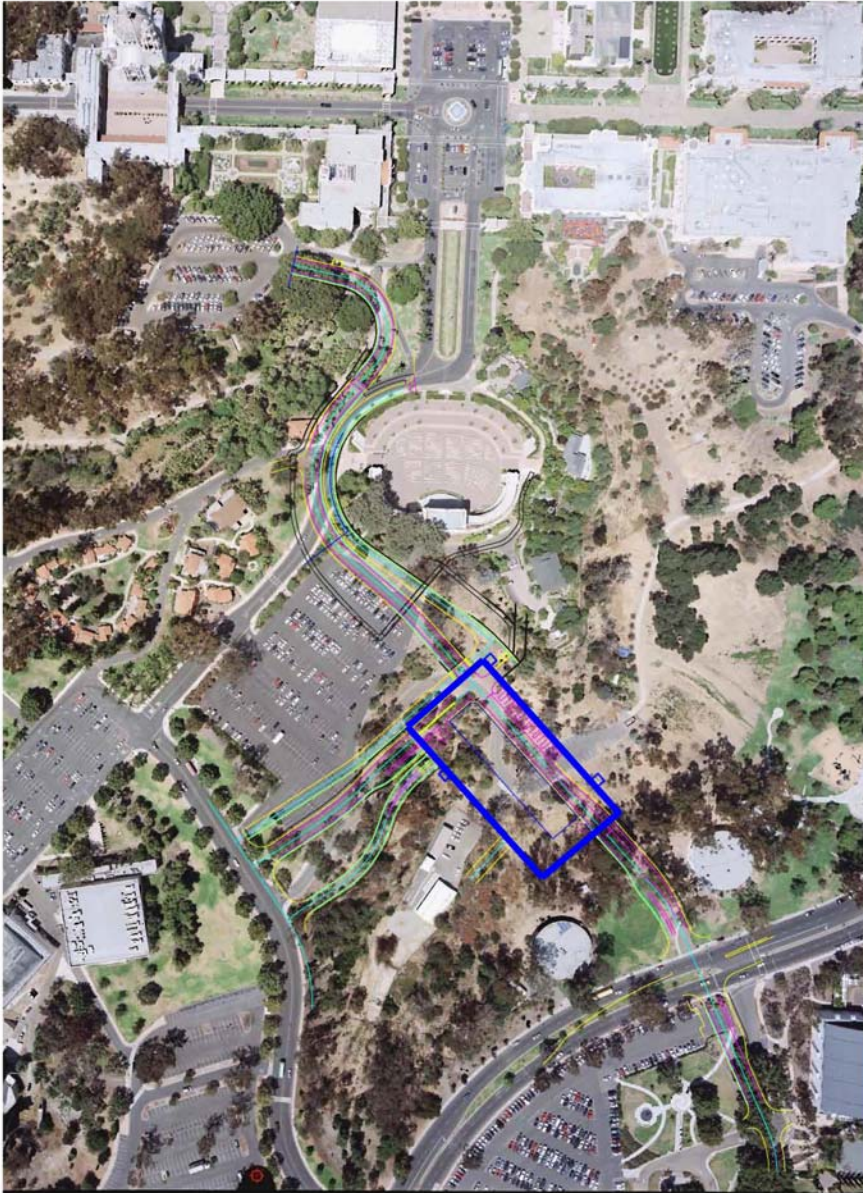


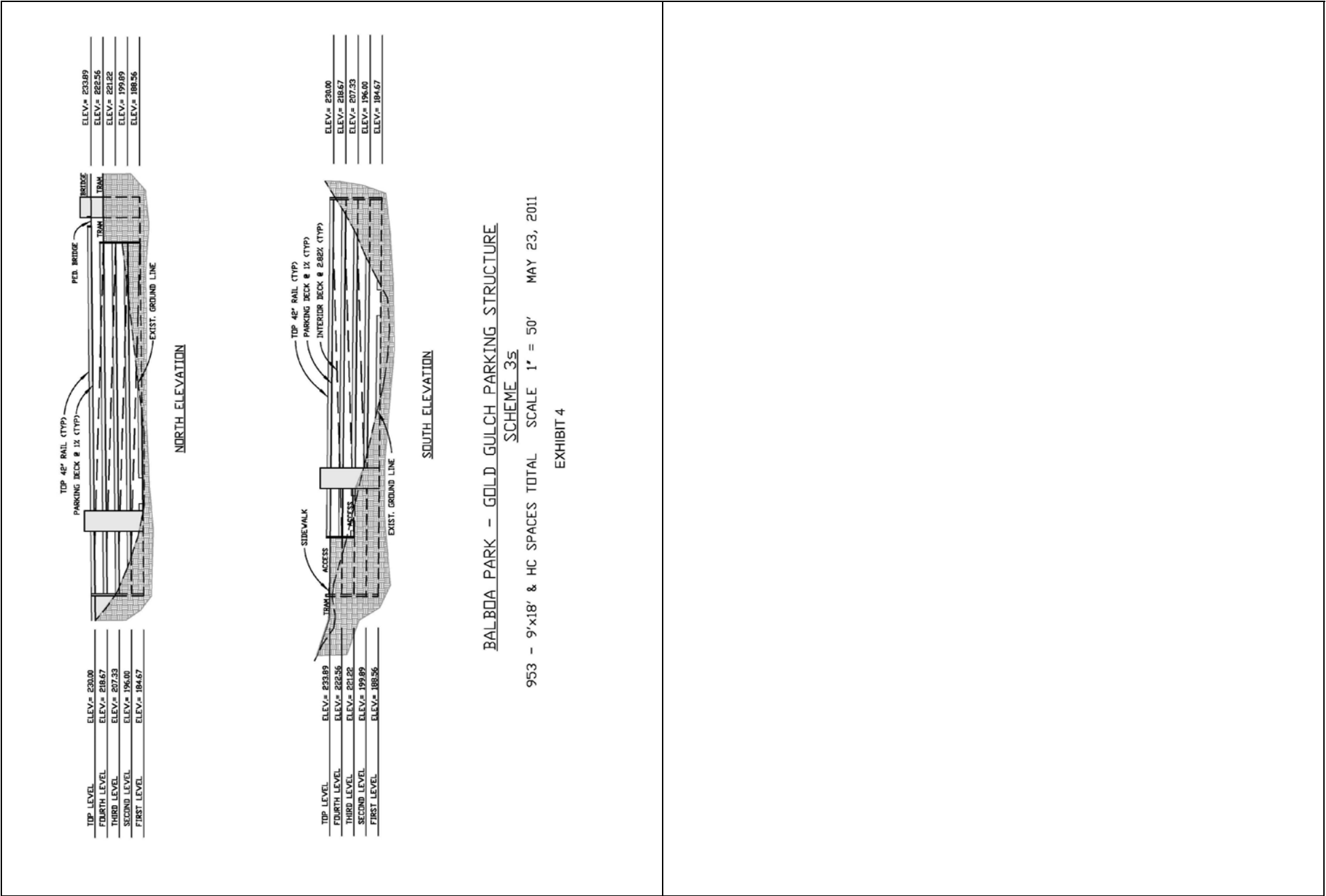
EXHIBIT 2 - AERIAL PHOTO WITH GOLD GULCH ALTERNATIVE
(PHOTO NOT RECTIFIED SO SOME VARIATIONS IN LOCATION ARE SHOWN)



RESPONSE



953 - 9'x18' & HC SPACES TOTAL SCALE 1" = 80' MAY 23, 2011



LETTER

RESPONSE

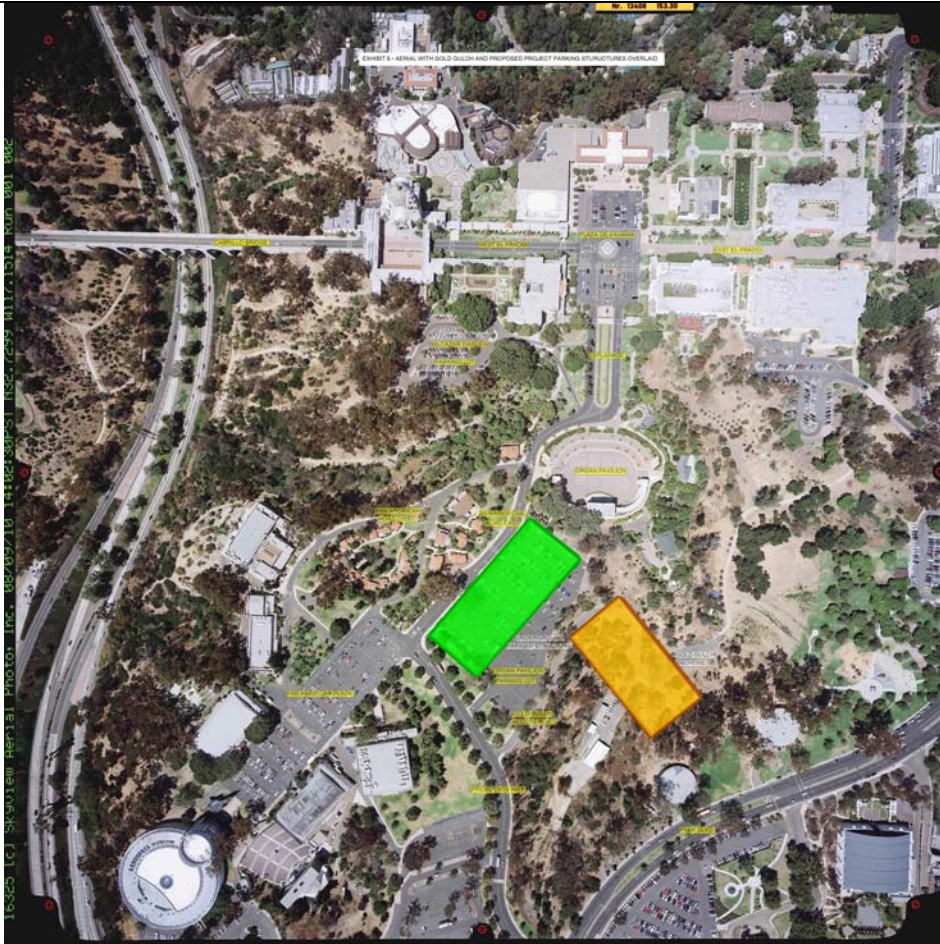
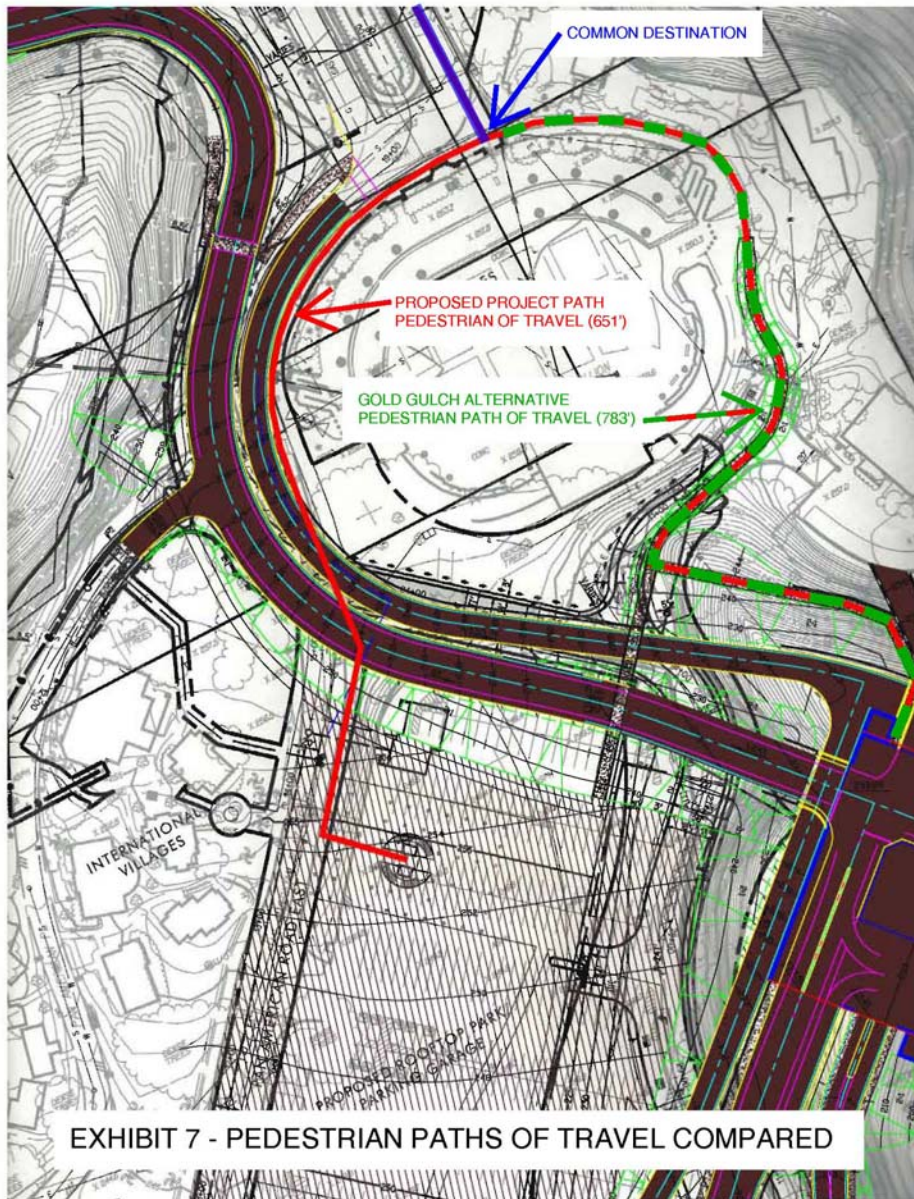


EXHIBIT 6 - AERIAL PHOTO WITH INSPIRATION
WAY REALIGNMENT OVERLAID
(PHOTO NOT RECTIFIED SO SOME VARIATIONS IN LOCATION ARE SHOWN)



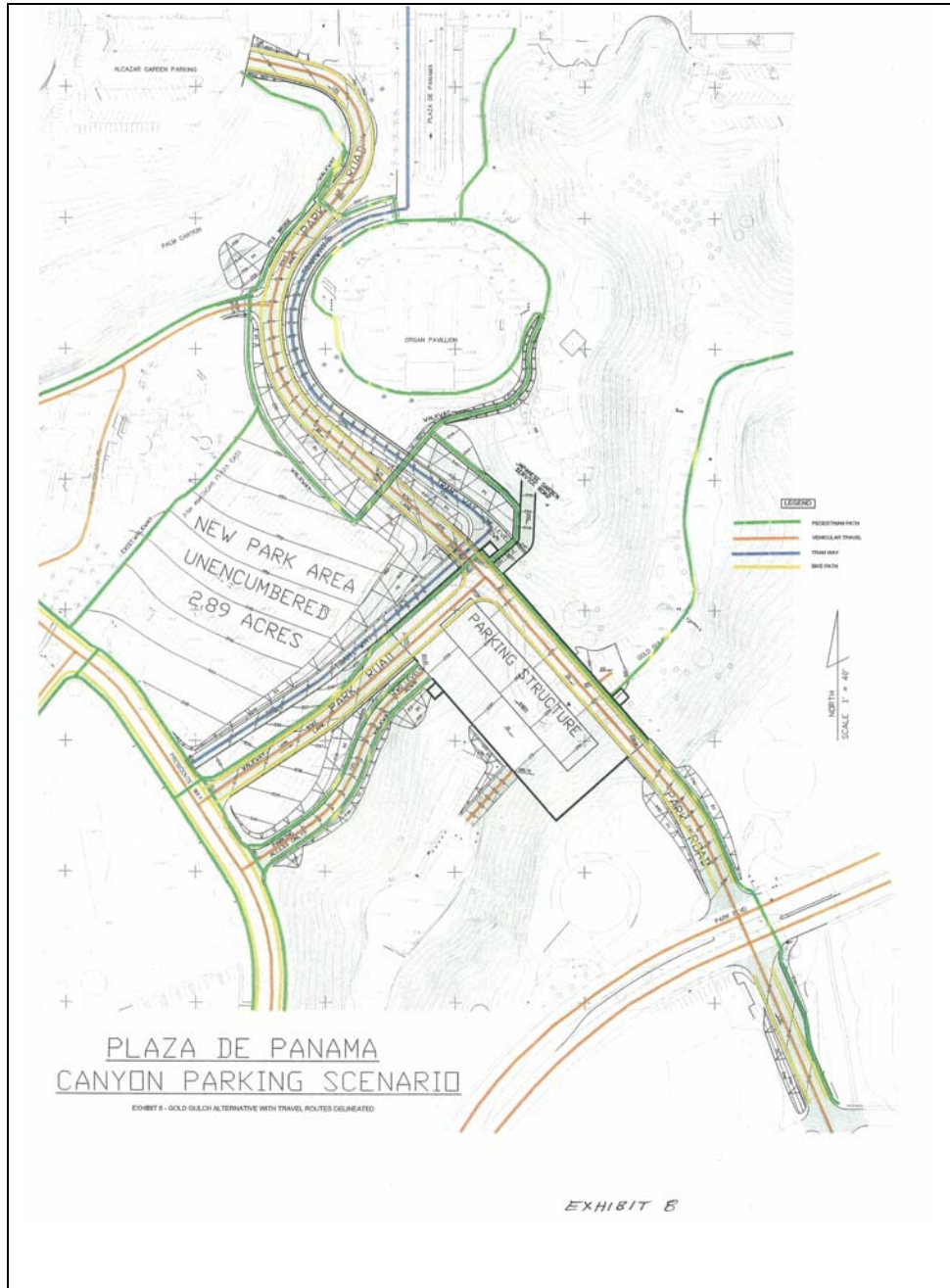
LETTER

RESPONSE

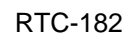


LETTER

RESPONSE



RESPONSE



LETTER

RESPONSE

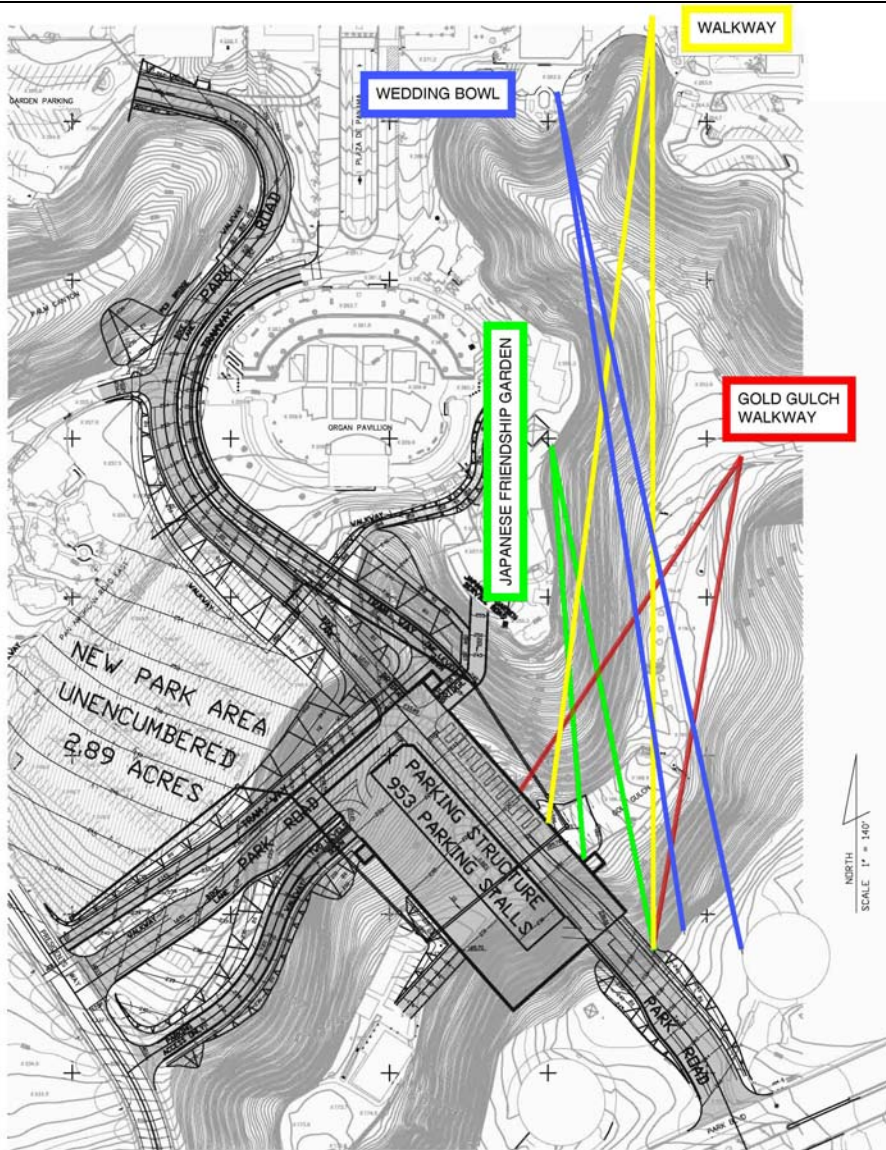
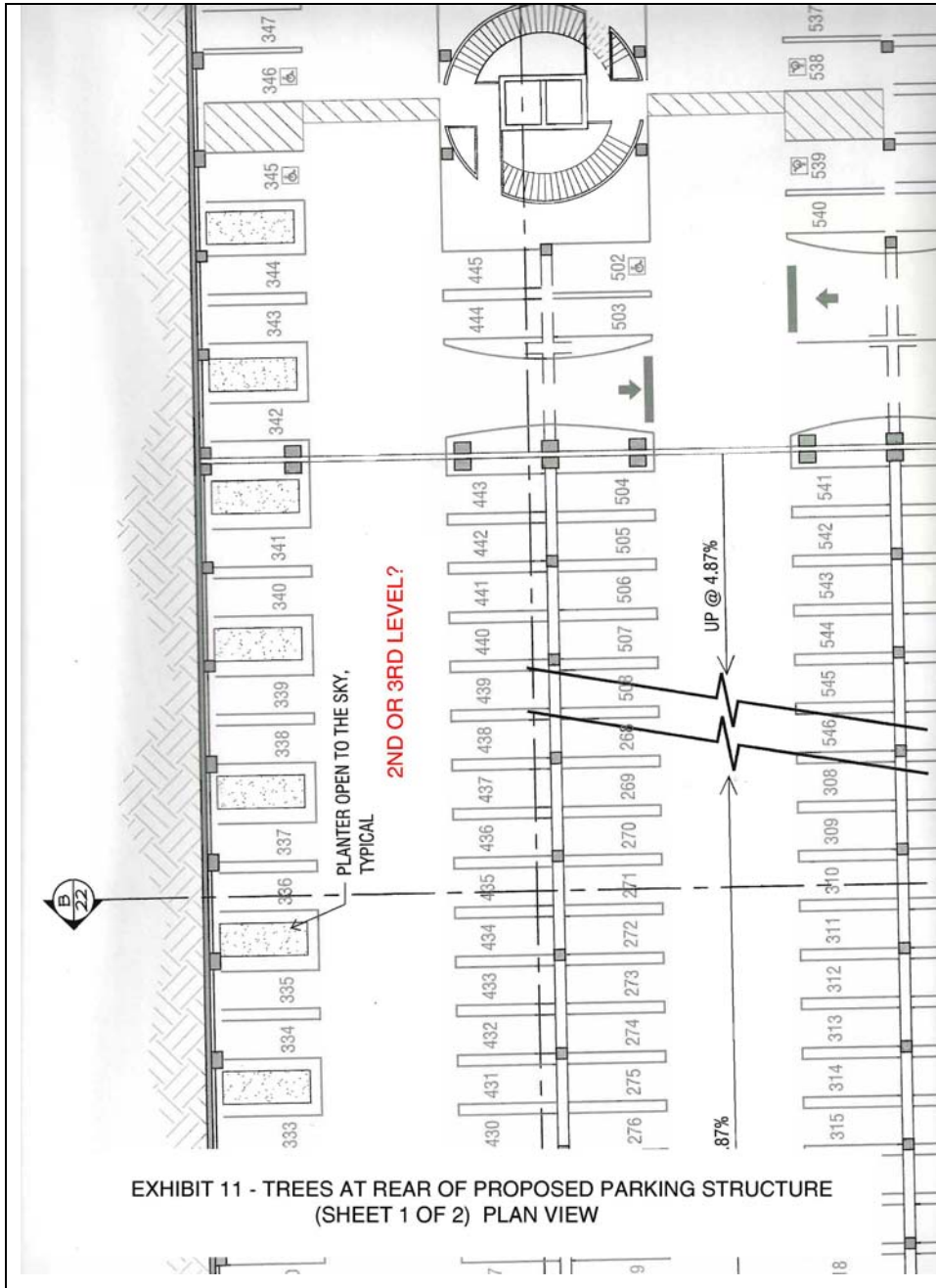


EXHIBIT 10 - SIGHT LINES TO GOLD GULCH PARKING STRUCTURE

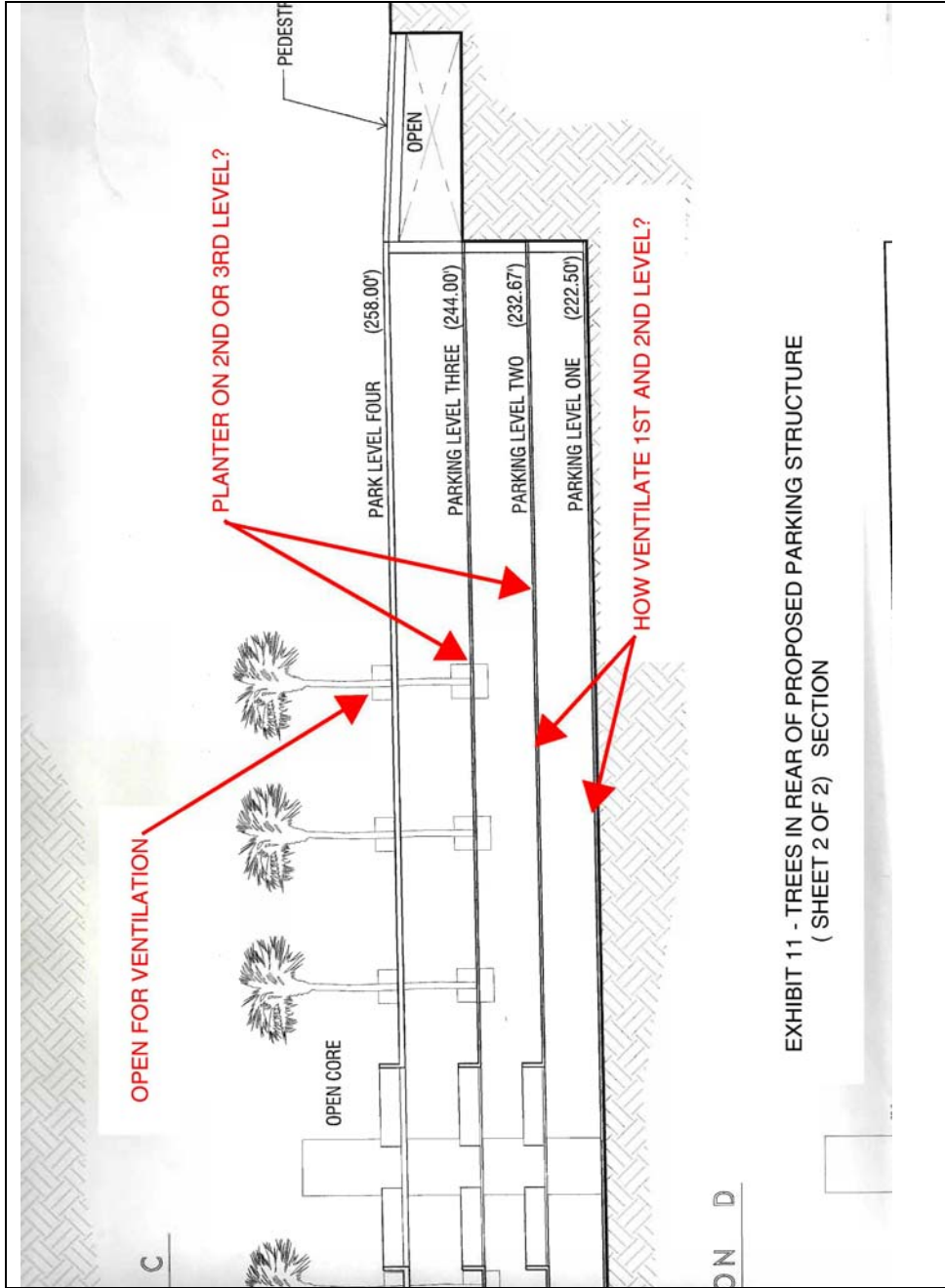
LETTER

RESPONSE



LETTER

RESPONSE



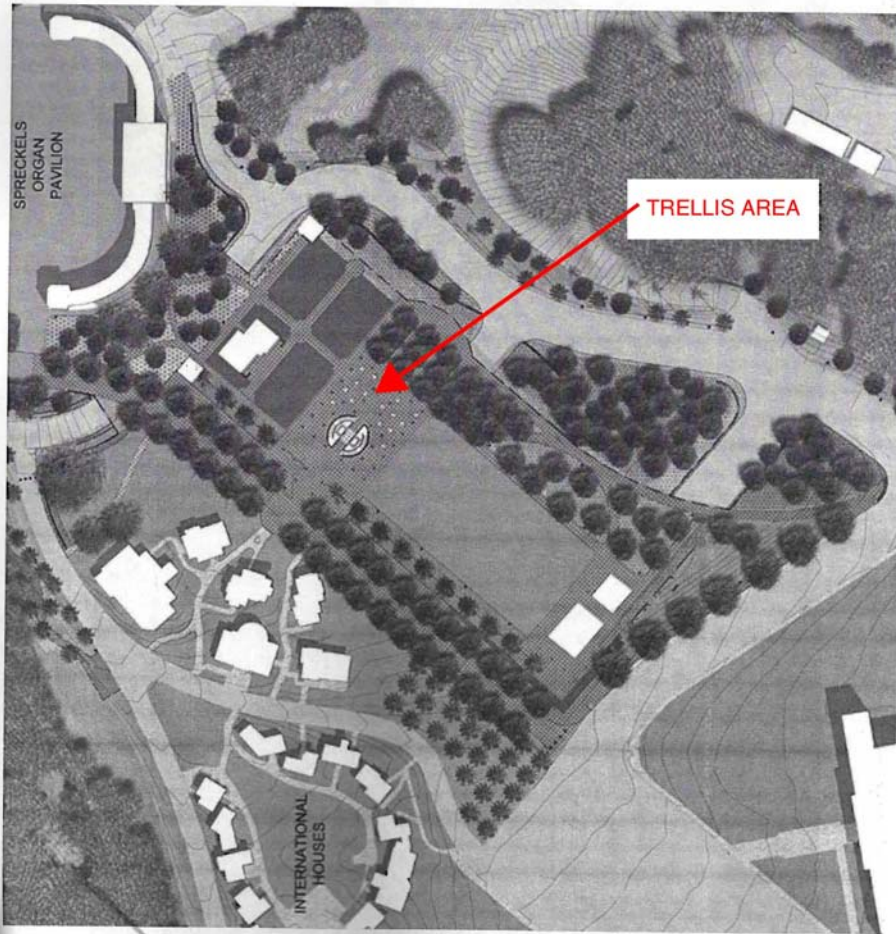
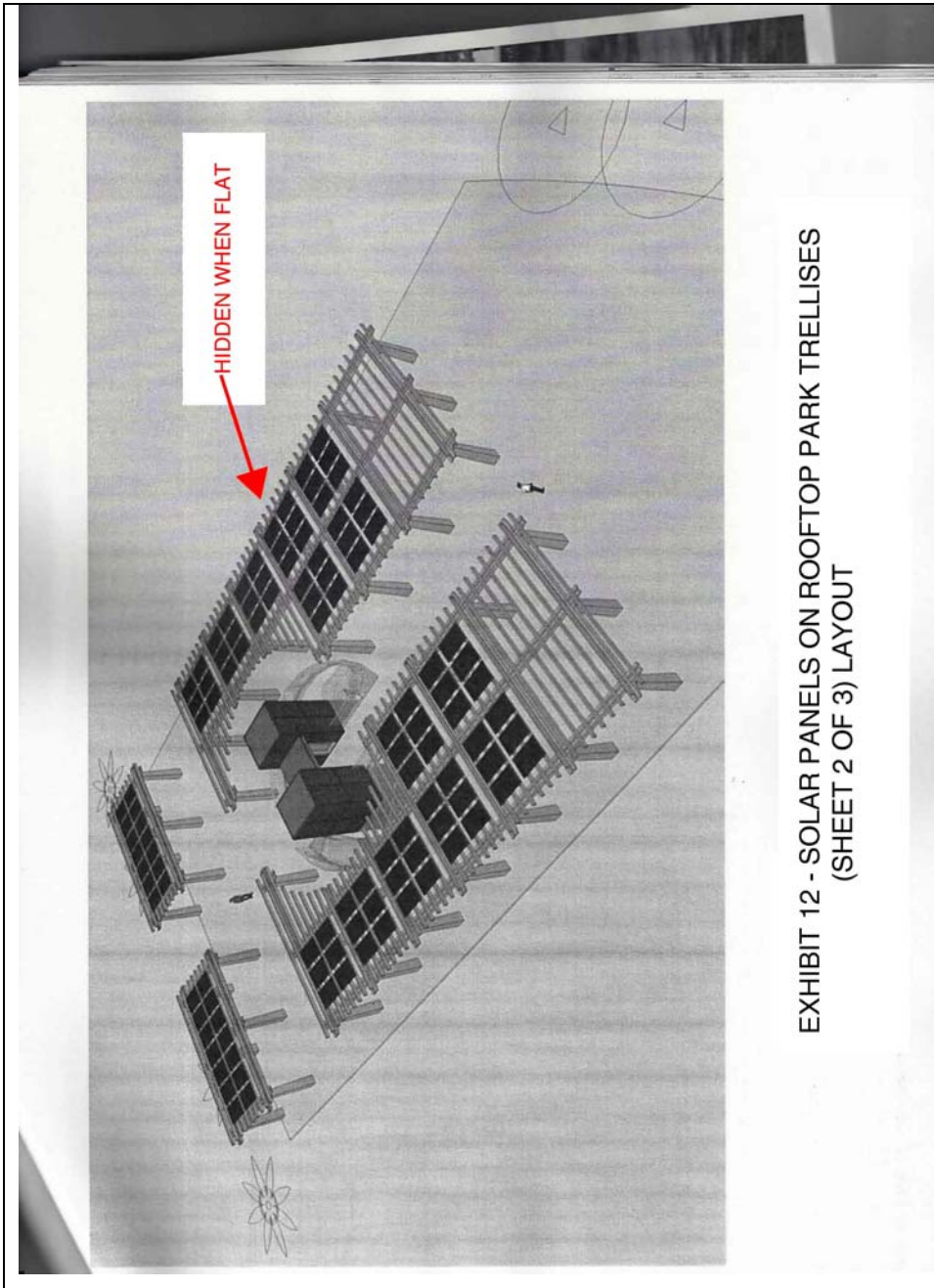


EXHIBIT 12 - TRELLISES WITH SOLAR PANELS ON ROOFTOP PARK
(SHEET 1 OF 3) OVERALL PLAN

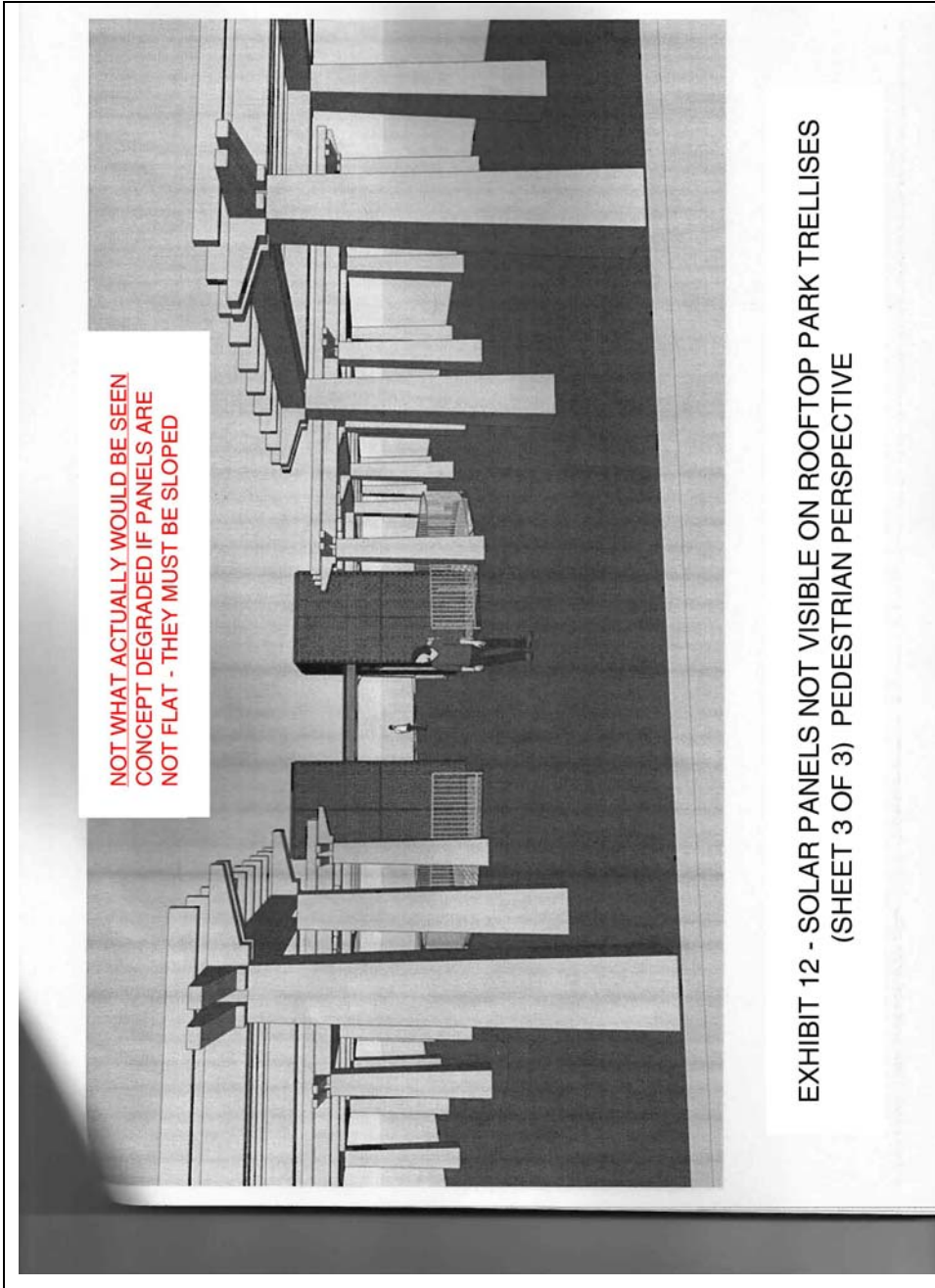
LETTER

RESPONSE



LETTER

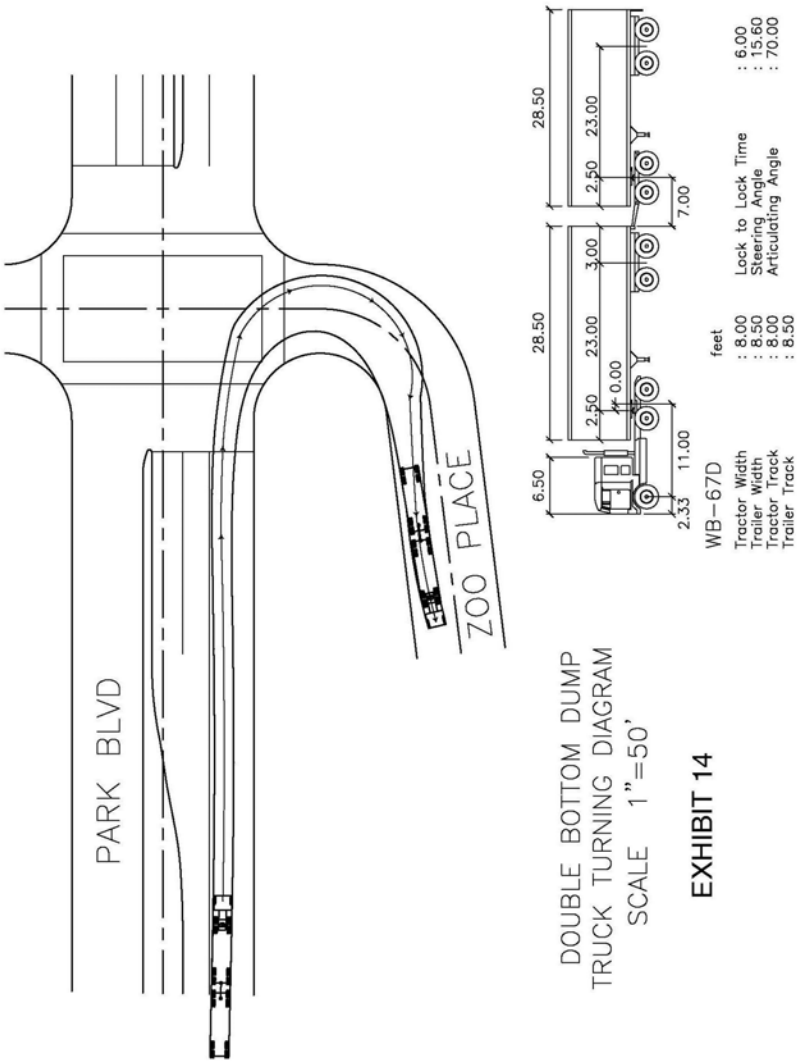
RESPONSE

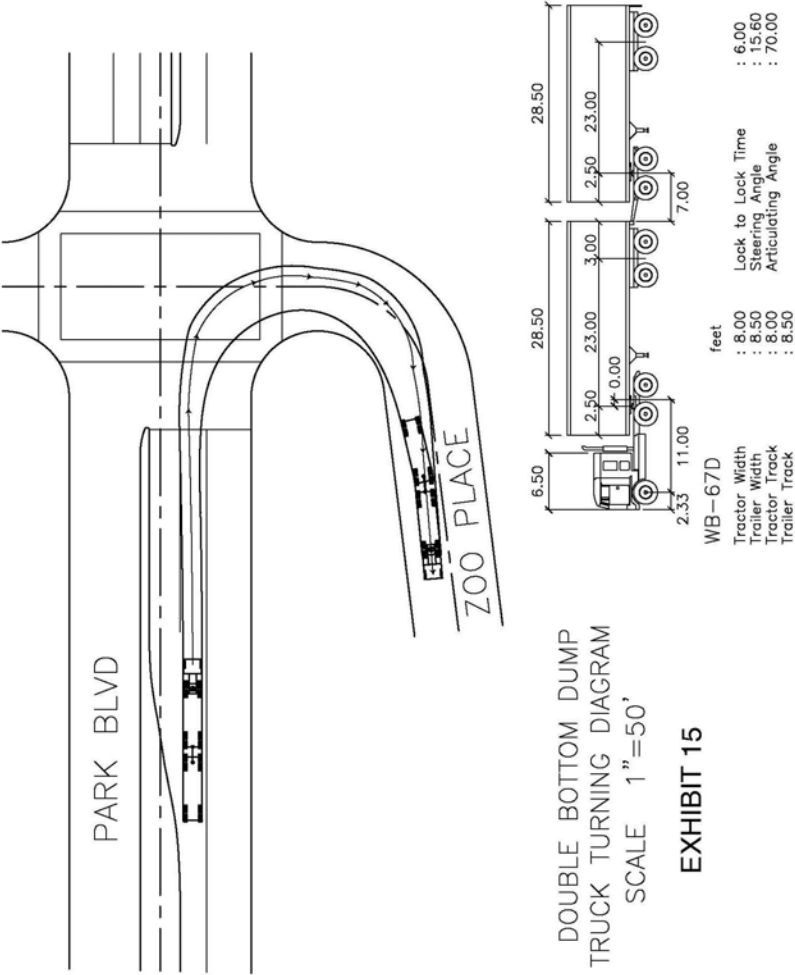


LETTER

RESPONSE





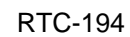




RESPONSE



RESPONSE



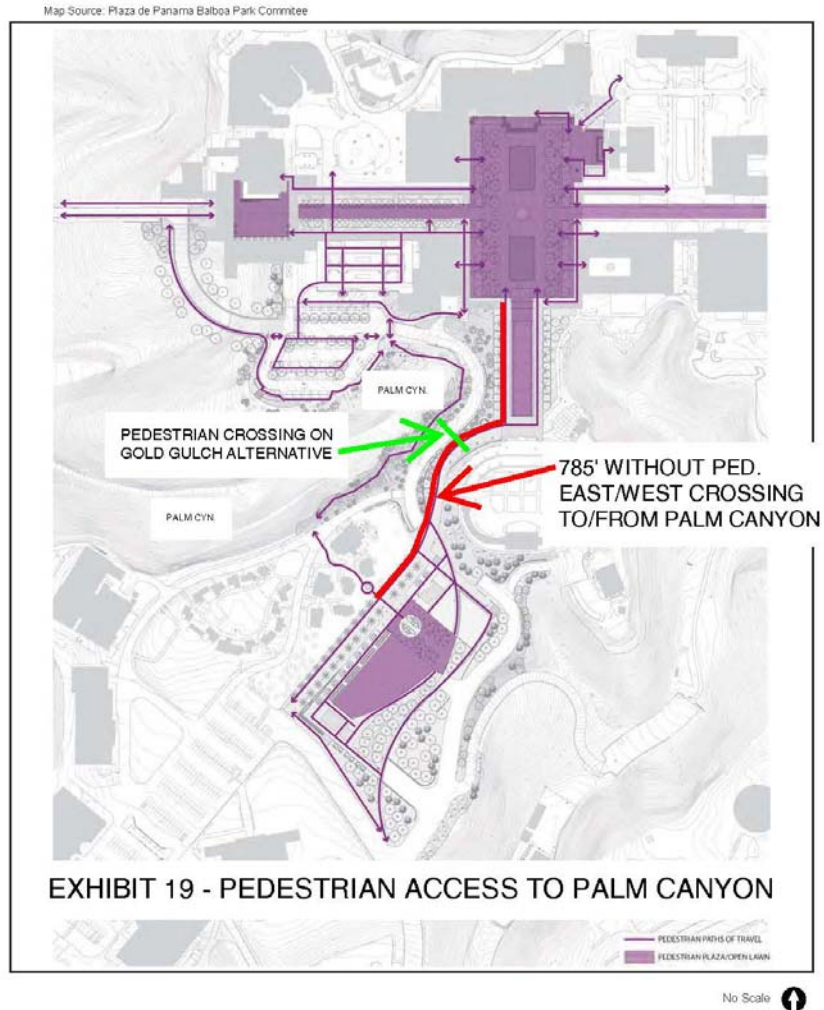


FIGURE 3-32
Proposed Pedestrian Circulation

M:\JOBS\410099\env\graphic\fig3-32.ai

01/13/12

LETTER

RESPONSE

Letter AH

PAUL L. BLACK, M.D., F.A.C.P.
INTERNAL MEDICINE

3588 7th Avenue
San Diego, CA 92103
Telephone # (619) 296-6504
Fax # (619) 296-7002

To: E. Shearer-Nguyen, Environmental Planner, San Diego Development Services

Re: Plaza de Panama Project

CC: San Diego City Council

Dear Ms. Shearer-Nguyen:

AH-1

The "Jewel in our Crown" is a used car lot! The Plaza de Panama was envisioned as the San Diego Community Center, where it's citizens could assemble for enlightenment, entertainment and cultural pursuits. Instead, it now consists of exhaust belching vehicles, both autos and buses, jockeying for parking places while the visitors to the park dodge, bob and weave to avoid being maimed by same said vehicles.

Why is this? What "Historical Environmental Planner" allowed this travesty?

Fortunately, we now have an excellent potential to fix the mistakes of the past. I am in unwavering support of the Plaza de Panama Project proposed by Dr. Erwin Jacobs and the Plaza de Panama Committee.

AH-2

The Draft EIR studied 13 alternatives to the proposed project, and it appears that none of them offers an impact-free way to achieve the goal of reclaiming public spaces in the park for people. Only this project will clear vehicles from the entire core of the park and still allow cars to enter from the west. This is vital for the park organizations, the community and the businesses on the west side. I understand that the Centennial Bridge does result in a historical impact, but its visibility will be limited and it serves an important functional purpose. Let us not reject the Good in pursuing the unreachable Perfect!

AH-3

The project does a very good job of beautifying the park and making it more accessible to visitors, while still paying attention to the logistics of getting visitors to and from the park. The alternatives studied each have benefits and impacts, but none of them offers a solution nearly as acceptable as this project. As to the proposed parking structure, one only has to look to the experience of San Francisco's Golden Gate parking solution, which was initially opposed but is now embraced by almost all San Franciscans.

I look forward to the day - hopefully in my lifetime - when this project is finished and we can all enjoy a car-free park experience.

Sincerely,

Paul Black March 15, 2012

AH-1 Comment noted.

AH-2 Comment noted.

AH-3 Comment noted.

LETTER

RESPONSE

Letter AI

From: [Peter Bridge](#)
To: [Lightner](#); [Councilmember Sherri Faulconer](#); [Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio](#); [Councilmember Carl Zafra](#); [Council Member Lorie Emerald](#); [Councilmember Marti Alvarez](#); [Council Member David Sanders](#); [Jerrry](#); [info@plazadepanama.org](#); [DSD FAS](#)
Subject: Balboa Park -- Centennial Bridge
Date: Monday, March 26, 2012 9:32:32 AM

To the City Council:

AI-1

I urge you to support, and to help move forward, the Plaza de Panama/Centennial Bridge project. I am convinced that the Plaza de Panama plan will improve the quality of the park, and that it is the best possible compromise for vehicular access.

Let's get this done in time for the centennial!

*Peter Bridge, LEED AP
 Sun Country Builders
 138 Civic Center Drive, Suite 204
 Vista, CA 92084
 (760) 630-8042 x305*

AI-1 Comment noted.

LETTER

RESPONSE

Letter AJ

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

RE: Balboa Park Plaza de Panama
Project No. 233958/SCHNO 2011031074

Dear Ms. Shearer-Nguyen,

AJ-1 I had almost given up on responding to this incredibly obtuse, voluminous and difficult to read document. Recon has been in business since I was an environmental analyst and though it is cumbersome and not reader friendly, it probably checks all the boxes for a properly prepared EIR.

However, there are several issues that warrant further explanation.

1. There is too great an emphasis placed on the/a parking structure being in close proximity to the Plaza de Panama – particularly when alternatives are considered that would place a parking structure(s) elsewhere and obviate the necessity for the god-awful bridge. Its as if after concluding that an alternative is superior because it may have less historic impacts, it fails because it doesn't plop the /a parking structure at the Organ Pavillion parking lot – closer to the Plaza. There is nothing sacrosanct about the Organ Pavillion parking lot garage. It is as easily moved in the revision to the Precise Plan as it is to add the considerably more environmentally adverse bridge. The location of the parking structure was a policy decision unduly influenced by the institutions in 1991.

AJ-2 2. Shouldn't this document also discuss the issue of ADA parking and access? There is no regulatory imperative to continue to maintain the Alcazar parking lot as handicapped parking. This parking will be legal wherever it would be located within the park.

And while they're at it, the necessity for valet parking begs further (any) elaboration. We all know the real estate deal the City signed with the Cohens allows them to have valet parking. Someone somewhere must provide a discussion as to the necessity to continue it given that the issue has morphed into one of the overriding rationales for the construction of the bridge. The document must acknowledge that there is no legal requirement for the continued use of the Alcazar parking lot except as a feature of the project proposal.

AJ-3 3. With regard to the West Mesa Alternative, the parking structure would be better located at the southwest quadrant of El Prado and Balboa Drive – no impacts to the lawn bowling facilities or potential impacts to MHPA from being on the canyon or to proximity with the bridge. Why was this location over-looked?

This alternative should also be paired with the construction of a parking structure at Inspiration Point as opposed to the Organ Pavillion lot.

AJ-1 Comment noted. The placement of the parking structure takes into consideration that visitors seek parking closest to the core of the Central Mesa. In addition, the Organ Pavilion parking lot location would reduce and avoid environmental impacts since it is already disturbed and paved and the rooftop park would provide additional usable park space.

As noted, the EIR addresses numerous alternatives with no new parking or other parking locations.

AJ-2 The Americans with Disabilities Act (ADA) requires the project facilities to be readily accessible to individuals with disabilities, including those who use wheelchairs. ADA specifically identifies restaurants, theaters, sales, parks, galleries, zoos, and recreation facilities as public accommodations that shall not discriminate against individuals with disabilities. In order to ensure Balboa Park facilities are available for the enjoyment of individuals with disabilities, adequate access for the disabled must be provided. The California Building Code and City of San Diego includes access provision requirements to ensure adequate access for the disabled in compliance with the ADA. Refer to the City's Information Bulletin 305 for more information (City 2010). The use of the Alcazar parking lot for handicap parking would be provided to meet these requirements.

AJ-3 As indicated in the Parking Demand Study (see Appendix D-2), the existing valet parking is heavily utilized and there is sufficient demand to continue to provide valet service under the project. It is acknowledged that there is no legal requirement to provide valet service.

LETTER

RESPONSE

AJ-4

4. Separately and as a part of the West Mesa Alternative (first paragraph, pg 9-105), the applicant and the environmental analysis continues to insist that pay parking for any garage only works at the Organ Pavillion lot because of its central location. But they also discount and deride any suggestion that in order to make such a paid parking garage viable that paid parking must be undertaken throughout most of the central mesa as well. It defies logic and the habits of most visitors to suggest that they will gravitate to the pay garage rather than park for free at any one of several nearby locations. The Zoo certainly has no belief in the claims for the use of the garage. I might add that this has been one of the major policy issues that the City Council has avoided discussing all these years.

Submitting this concept to a dozen parking experts for their opinion is certainly called for. You cannot discount the concerns without some credible analysis of why their claims for garage occupancy will work with free parking otherwise available throughout the rest of the Park.

AJ-5

5. The last sentence of the Traffic Hazards paragraph on pg 9-115 begs some further elaboration, perhaps a map?

The general tenor of the document is to qualify and be dismissive of the impacts resulting from non-compliance with the Secretary of Interior's Standards. This is also true with the Historic Resources Technical Report. I have never seen as little concern paid to impacts to a historic resource because of failure to comply with the Standards and this is a National Historic Landmark property. The discussion does not sufficiently acknowledge the gravity and significance of the impacts on a National Historic Landmark District.

Sincerely,

Ron Buckley

AJ-4

The EIR includes a reasonable range of alternatives and need not address every conceivable alternative per CEQA Guidelines Section 15126.6(a). The two alternative parking structure locations identified in this comment are addressed adequately by the West Mesa Parking Structure Alternative and the Inspiration Point Parking Structure Alternative analysis in Section 9.3. The EIR alternative analysis provides a meaningful discussion of alternatives that reduce the project's significant environmental impacts. The suggested alternative would not further reduce the project's environmental impacts or meet additional project objectives not achieved by the West Mesa Parking Structure Alternative and the Inspiration Point Parking Structure Alternatives. Thus, the suggested alternative need not be analyzed in the EIR.

AJ-5

See response to comment AJ-1. A Parking Demand Study (see Appendix D-2) was completed by a parking expert to evaluate parking habits and the proposed paid parking. The City Debt Management Department have reviewed and concurred with the Parking Demand Study.

The following is excerpted from the Parking Demand Study:

Based on the existing condition of visitors having to re-circulate throughout the Prado lots in search of available parking when other, more remote lots have an adequate supply of parking, we expect that many of these visitors will migrate towards the certainty of the new parking structure. Since it will be the most convenient parking option for the Prado and the Central Mesa institutions, it will be the first choice for many visitors.

In addition, other parking industry studies support the concept that a large percentage of parkers would choose reliable, convenient paid parking over less convenient free parking.

The proposed parking structure would primarily serve the uses in the Central Mesa area, which does not include the Zoo. However, others would not be prevented from using the facilities.

The location of the project's parking structure in the core of the Central Mesa would meet the parking demand generated by the institutions located in this area. These demand generators are not present in the vicinity of the West Mesa Alternative.

LETTER

RESPONSE

4. Separately and as a part of the West Mesa Alternative (first paragraph, pg 9-105), the applicant and the environmental analysis continues to insist that pay parking for any garage only works at the Organ Pavillion lot because of its central location. But they also discount and deride any suggestion that in order to make such a paid parking garage viable that paid parking must be undertaken throughout most of the central mesa as well. It defies logic and the habits of most visitors to suggest that they will gravitate to the pay garage rather than park for free at any one of several nearby locations. The Zoo certainly has no belief in the claims for the use of the garage. I might add that this has been one of the major policy issues that the City Council has avoided discussing all these years.

Submitting this concept to a dozen parking experts for their opinion is certainly called for. You cannot discount the concerns without some credible analysis of why their claims for garage occupancy will work with free parking otherwise available throughout the rest of the Park.

AJ-6 5. The last sentence of the Traffic Hazards paragraph on pg 9-115 begs some further elaboration, perhaps a map?

AJ-7 The general tenor of the document is to qualify and be dismissive of the impacts resulting from non-compliance with the Secretary of Interior's Standards. This is also true with the Historic Resources Technical Report. I have never seen as little concern paid to impacts to a historic resource because of failure to comply with the Standards and this is a National Historic Landmark property. The discussion does not sufficiently acknowledge the gravity and significance of the impacts on a National Historic Landmark District.

Sincerely,

Ron Buckley

AJ-6 Additional traffic hazard information, including maps illustrating pedestrian/vehicle conflicts for all alternatives, is provided in the TIA (see Appendix D-1, Exhibits 117-129).

AJ-7 Comment noted. As indicated in the EIR, conformance with the SOI Rehabilitation Standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under CEQA. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less than significant adverse impact on a historical resource. Projects that do not comply with the SOI Rehabilitation Standards may or may not cause a substantial adverse change in the significance of an historical resource and would require further analysis to determine whether the historical resource would be materially impaired by the project under CEQA Guidelines 15064.5(b).

An SOI Rehabilitation Standards analysis was completed in Section 4.2.2 of the EIR. As indicated in that section, the Centennial Bridge and Centennial Road components of the project would conflict with SOI Rehabilitation Standards 2 and 9. Considering the Centennial Bridge improvements would constitute a substantial adverse change to an historical resource, the Centennial Bridge inconsistency with the SOI Rehabilitation Standards was considered a significant impact per the CEQA Guidelines. The Centennial Road improvements conflict with the SOI Rehabilitation Standards was determined to not be significant per CEQA since it would not demolish, destroy, relocate, or alter the NHLD such that it would materially impair a district contributor (Section 4.2.2.2). Thus, the SOI Rehabilitation Standards impact analysis and conclusion are consistent with the CEQA Guidelines Section 15064.5.

LETTER

RESPONSE

Letter AK

John J. Castle, Frances Castle
3770 Wellborn St.
San Diego, CA 92103
March 15, 2012

E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS501
San Diego, CA 92101

Project Name: **Balboa Park Plaza De Panama**
Project No. 233958/SCH No. 2011031074

Dear City Government Officials and Concerned Organizations,

AK-1

We consider ourselves frequent visitors to Balboa Park and concerned citizens of San Diego. I have lived in San Diego since 1966 (except for 1975-1983) and my wife since 1972. We live in Mission Hills and go to Balboa Park at least once a week during spring, fall and winter, more frequently during the summer. We are long time members of the Museum of Art and Zoo, and support the Old Globe Theater and previously the Starlight Theater. We attend concerts in the park, Houses of Hospitality Sunday events, free museum Tuesdays, organ concerts; we picnic on the grass and spend many hours walking our dog through the park.

AK-2

I've printed out my own copy of the Balboa Park EIR and studied it for several days, and again today. The overwhelming conclusion for me is that it is intended to provide Valet Parking for those who attend special evening and/or daytime programs. The paid parking garage will provide for this. A few years ago there were several Valet Parking spaces reserved in the Alcazar parking lot. These were eliminated by "popular demand". Now those that need Valet Parking have developed this plan to eliminate free parking with a paid parking garage. Pedestrian use and additional green areas are only a subterfuge for this common citizen who enjoys our park without paid parking.

AK-3

There are several mentions of this "project" being needed in the year 2030. We all know of projects that are needed tomorrow. As I state below, there is no analysis of demographics of park use. I refer you decision makers to an article our UT, March 13, 2012, "Aging Population Is Growing in Diversity" by Jong Won Min. We are already members of this aging population and want to be able to continue to use our park without having to pay for parking.

AK-4

Our major objections to altering the park are:

1. A paid parking garage would eliminate most of the parking that is now free.

We never have a problem finding free parking but we also do not go to "December Nights".

AK-5

2. The Environmental Impact Report makes no attempt to assess and consider the income levels of the park users, yet over 100 valet parking spaces are in the plan. Our experience with our own frequent use of the park (daytime) is that the users are apparently middle class, as we ourselves are. And using ourselves as examples, we will not pay to park in a public park, much less use valet parking.

AK-6

3. Grass cover is planned with no provision for the water to maintain it, in a city that frequently experiences severe drought and water rationing.

AK-1 Comment noted.

AK-2 Valet service is an existing feature in Balboa Park. The Parking Demand Study (PCI 2012) determined there is a demand for valet services and the project has been designed to meet the anticipated valet service demand. Free parking would continue to be provided elsewhere within Balboa Park if the project is approved and implemented.

AK-3 As indicated in CEQA Guidelines Sections 15131, social changes shall not be treated as significant effects on the environment and the focus of the analysis shall be on physical changes.

The project would not eliminate most of the existing free parking, as over 80 percent of Balboa Park parking would remain free. Per the Parking Demand Study (see Appendix D-2), adequate free parking would be provided within Balboa Park.

AK-4 See response to comment AK-3.

AK-5 See response to comment AK-2.

AK-6 Water supply is addressed in Section 4.15.2. Although the project would not exceed the City's Significance Determination Thresholds (2011) with respect to when to prepare a water supply assessment, a Water Demand Analysis (see Appendix M) was prepared for the project that determined the project would not result in a significant water demand impact. The project would include drought-resistant landscaping where feasible and water conservation features such as timers on irrigation sprinklers to reduce water demands.

LETTER

RESPONSE

<p>AK-7</p> <p>AK-8</p> <p>AK-9</p> <p>AK-10</p> <p>AK-11</p> <p>AK-12</p> <p>AK-13</p> <p>4. The report provides for an underground parking garage but existing paved parking provides opportunity for storage of runoff water, which is more environmentally beneficial.</p> <p>5. Balboa is a public park for use and enjoyment by the ordinary citizens of San Diego, not just for those who require Valet Parking or the expected increase in tourist visitors during the Centennial or December Nights.</p> <p>In addition, we find the Environmental Impact report inadequate:</p> <p>1. It does not assess and evaluate the users of the park, their income levels, ability, or willingness to pay for parking.</p> <p>2. It assumes valet parking to be a necessity but offers no evaluation.</p> <p>3. It gives no consideration to necessity for or use of additional grass areas proposed; or to water needed to maintain these areas.</p> <p>4. It does not address the impact on the surrounding Bankers Hill/Hillcrest neighborhoods by those seeking free parking.</p> <p>5. The plan projects parking needs to 2030 with no documentation, specifically population demographics, to justify those needs, I again refer you to the <u>UT</u> article, March 13, 2012, "Aging Population Is Growing in Diversity."</p>	<p>AK-7 The existing Organ Pavilion parking lot does not have any storm water runoff storage or water treatment/bio retention. Runoff flows directly into the storm drain.</p> <p>The project would implement numerous bio retention areas to treat storm water runoff prior to discharging into the storm drain system. See Water Quality Technical Report (Appendix P). In addition, the underground parking structure would have a rooftop park, which would result in a net reduction of impervious surface compared to existing Organ Pavilion paved parking lot.</p> <p>AK-8 Comment noted.</p> <p>AK-9 See response to comment AK-3.</p> <p>AK-10 See response to comment AK-2.</p> <p>AK-11 See response to comment AK-6.</p> <p>AK-12 Parking impacts to surrounding neighborhoods are evaluated in Section 4.4. As indicated in that section, the project would not increase the demand for parking and would increase the parking supply. In the existing condition, both the Federal/Aerospace and Inspiration Point parking lots are underutilized and would be occupied by those seeking free parking. Thus, the project would not result in increased parking demand within surrounding neighborhoods and the project impact to neighborhood parking would be less than significant. See response to comment AL-19 below.</p> <p>AK-13 See response to comment AK-3.</p>
---	---

LETTER

RESPONSE

Letter AL

William G. "Jay" Coffman
1601 Myrtle Avenue
San Diego, CA 92103
(619) 501-5524

March 21, 2012

Sent via email: DSDEAS@sanidiego.gov

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

RE: Comments:
Project Name: BALBOA PARK PLAZA DE PANAMA
Project No. 233958/SCH No. 2011031074
Community Plan Area: Balboa Park
Council District: 2 (Faulconer) 3 (Gloria)

Dear Ms. Shearer-Nguyen:

AL-1 I am a resident of San Diego having resided at my address since 2004. My residence is in close proximity to the north side of Balboa Park and I have a great interest in the Park and use it regularly. The following are my comments concerning the Environmental Impact Report ("EIR") prepared for the Balboa Park Plaza de Panama Project (hereinafter, "the Balboa Park Project"), Project No. 233958, SCH No. 2011031074, dated January 23, 2012.

Pursuant to the February 9, 2012 Public Notice, the date for filing comments regarding the EIR has been extended to March 22, 2012 so these comments are timely.

**AL-2 FOREWORD - THE EIR IS INADEQUATE
FOR ITS STATED PURPOSE**

Wow, I guess we must have paid for the EIR by the page--I sure hope someone thinks we got our money's worth. It is good to have all the raw data somewhere so engineers and attorneys with land use expertise can evaluate it but the real impact of this EIR will be impossible for the public itself to comment on in a meaningful manner. Unfortunately, it will not be impossible for politicians to make decisions on because somewhere in the thousands of pages of the EIR and supporting documents is something for everyone.

The EIR appears to be written to obfuscate rather than illuminate the issues, to confuse the issues through excess details and poor writing and to hide responsibility for different issues through the over-use of acronyms without definitions or inadequate

AL-1 Comment noted.

AL-2 Comment noted.

LETTER

RESPONSE

<p>definitions (the "List of Abbreviated Terms" hidden at pages 106 - 109 of the document is insufficient to make the document readable to any normal reader). It is one thing to file a report to be used only by professionals in the field and another to release a report to the public for meaningful comment and discussion. This EIR is inadequate for submission to the public for comment.</p> <p>AL-3 I also have a serious objection to the six "Project Components" as referred to time and again by various terms in the EIR. These components start with the assertion that we need to get rid of cars in the central mesa of the park. This is a questionable assumption as we've had cars and pedestrians sharing the Plaza de Panama, El Prado and Plaza de California for years. Indeed, it appears that shortly after the 1935 exposition cars have been a central part of the central mesa. From someone who uses the park regularly to walk and drive in I do not see a major problem between cars and pedestrians. The EIR started with the premiss that these components are legitimate. There was no meaningful public discussion on this issue before these statements became the focus of this EIR. What public discussion there was was a farce in that there never was serious consideration given to other viewpoints and options.</p> <p>AL-4 Finally, the EIR contained no analysis of what is planned for the centennial celebration and how that may impact parking and traffic in the park. The centennial celebration is one of the things that is set forth as a reason for this project yet it is hardly mentioned in the EIR. This represents two, but only two, years of the park's existence and should have been discussed and analyzed.</p> <p>AL-5 INTRODUCTION</p> <p>First and foremost the Balboa Park Project is a horrible idea for San Diego and should be abandoned before any more time and money is spent on it.</p> <p>As a general principle I believe that San Diego leadership should work to make San Diego a good place to live for the people who live here rather than for the people who may one day live or visit here. Businessmen and developers striving to make a profit in San Diego should be used as tools to further the good of the people who live here and should be carefully controlled by our leaders so as not to exceed that principle. Unfortunately, this has not been the case with present and past leadership of San Diego.</p> <p>The present Mayor and City Council of San Diego, since being elected, have spent an inordinate amount of time getting San Diego out of a fiscal mess caused by earlier politicians who sold out San Diego's future for deals made at that time that seemed good to them at the time. If this project goes through then the Mayor and City Council in ten or so years will be spending the people's money to fix the mess that Balboa Park will become fiscally, esthetically, historically and use-wise.</p> <p>AL-6 This Environmental Impact Report is inadequate because it analyzes a number of discrete alternatives but does not generate or evaluate a good common sense</p>	<p>AL-3 The EIR has been prepared consistent with CEQA Guidelines relative to project objectives and alternatives as outlined below.</p> <p>In accordance with CEQA Guidelines Section 15124(b), the EIR includes a statement of project objectives sought by the proposed project. As indicated in Section 3.1, it is a project objective to remove vehicles from the Plaza de Panama, El Prado, Plaza de California, the Mall (also called the Esplanade), and Pan American Road East.</p> <p>Per CEQA Guidelines Section 15126.6(b), because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall be focused on alternatives to the project which are capable of avoiding or substantially lessening any significant effect of the project even if these alternatives would impede to some degree the attainment of the project objectives. Furthermore, the range of alternatives to the proposed project shall include those that could feasibly accomplish most of the basic project objectives and could avoid or substantially lessen one or more significant effects per CEQA Guidelines Section 15126.6(c).</p> <p>AL-4 As mentioned, one of the objectives of the project is to have it completed in time for the 2015 Centennial. The Centennial Celebration is not a part of the project and is being planned by other parties. As discussed in Section 8.0 of the EIR, the project would not have an adverse effect on the Centennial Celebration.</p> <p>AL-5 Comment noted.</p> <p>AL-6 See response to comment AL-3.</p>
--	--

LETTER

RESPONSE

<p>approach to the situation. Part of the problem is that the original six assumptions are poorly articulated and dictate only one solution or vision for the park even though it analyzes it in several different scenarios. There are good alternative ways of addressing the park and the upcoming centennial celebration.</p> <p>AL-7 Making improvements to the park in time for the centennial may still be a good idea, however, the changes should, first and foremost, not destroy the nature of the park and then they should be what the city can afford. The city should not give away concessions or ongoing money making schemes to private developers and businessmen because the park should never become a vehicle for profit—it should remain for all the people who live in San Diego and those who visit us. It is far better to do without than to let private business build money making enterprises in the park that will make it harder for the people of San Diego to enjoy the park.</p> <p>AL-8 OBJECTIONS TO THE BALBOA PARK PROJECT AS SET FORTH IN THE ENVIRONMENTAL IMPACT REPORT</p> <p>I. The Primary Conclusion of the EIR should be followed and San Diego should not engage in this project.</p> <p>AL-9 Under "SIGNIFICANT UNMITIGATED IMPACTS" the EIR states without qualification in the sections, concerning Land Use, Historical Resources and Visual Effects that the impacts would be "significant and unmitigable." (EIR, p.3) These conclusions are restated throughout the 800 plus pages of the EIR and in the various attachments. There is nothing that suggests any way around these "unmitigable" impacts.</p> <p>This alone should be enough for us to forego this proposed project. We, as San Diego collectively, should be saying, "OK, that was an interesting idea but it's clear that upon examination it is not good for us or for the future. Let's think about more constructive ways of presenting the park for the centennial rather than do something our children will regret."</p> <p>AL-10 Further, the "SIGNIFICANT MITIGATED IMPACTS" (Land Use, Historical Resources, Transportation/Circulation and Parking, Biological Resources and Paleontological) all have potentially significant impacts that could possibly be mitigated but would present serious, and possibly huge, issues that we could probably mitigate but may not be able to. Do we really need to gamble with all of these issues when we have a really nice park we're all proud of and can make better without these risks?</p> <p>San Diego should follow the conclusions of the EIR and should consider some other way of presenting the park for the centennial.</p> <p>3</p>	<p>AL-7 Comment noted.</p> <p>AL-8 Comment noted.</p> <p>A-9 Comment noted.</p> <p>AL-10 All proposed mitigation identified in the EIR (LU-1, HR-1, TR-1, BR-1, N-1, and PAL-1) is feasible to implement. As identified in the EIR, all mitigation provided would reduce the associated significant impact to below a level of significance except in the case of construction equipment noise (see Section 4.12.4.4).</p> <p>Comment noted.</p>
--	--

LETTER

RESPONSE

<p>AL-11 II. The Centennial Bridge (or, "Bridge to Paid Parking") is a very bad idea.</p> <p>First and foremost it is obvious that the Centennial Bridge will be ugly--an eyesore if you will. Indeed, it will not only be ugly but there is no contention that it fits the artistic or architectural style of Balboa Park. Indeed, the EIR goes to great lengths to describe how the Bridge will be hidden from sight from all but a few places. Is this really what San Diego wants to present to the world? The first view that people will get when coming to the park will be this huge ugly Bridge to Paid Parking. It is much more preferable for us to leave the beautiful bridge the way it is and avoid the paid parking altogether.</p> <p>AL-12 It is also questionable whether there really is a problem with pedestrians and cars. Obviously there are times when pedestrians want to cross the street and must wait for cars and times when cars want to move and must wait for pedestrians. This happens everywhere in a large city like San Diego. From at least 1935 (and some times before) pedestrians and cars have coexisted in Balboa Park and there is no compelling reason to change that now. It will not hurt San Diego or Balboa Park to have a place where things just move a little slower than the normal hustle-bustle of the city.</p> <p>AL-13 The main reason for the Bridge to Paid Parking is just that, to funnel cars directly toward a paid parking garage. The initial price for parking is \$5.00 but that is unlikely to hold once cost overruns are tabulated and bottom lines are examined or public scrutiny decreases. The EIR made no analysis of who may run the parking garage and whether or not they can be relied on to live up to their bargain. Past experience in San Diego does not suggest that would be the case.</p> <p>AL-14 So, this Bridge to Paid Parking will cost us a lot of money to build. No matter who says they will pay for it we can rest on past practice to realize that the people of San Diego will pay for it. We can also rest on past practice to know that there will be huge cost overruns so we will pay way more than expected. But, somebody will make a lot of money building this Bridge to Paid Parking.</p> <p>AL-15 Then we will have to live with an entrance to Balboa Park that is terribly out of sync with the architecture and tone of the park and it will not matter that part of it is hidden from view by trees--we will know it's there.</p> <p>AL-16 III. Parking in Balboa Park</p> <p>A. No Parking problem in Balboa Park</p> <p>There is no parking problem in Balboa Park now or in the immediate future. The EIR Parking Analysis shows Balboa Park has 6378 existing parking spaces located in 16 different parking lots. Even taking away the 2924 parking spots assigned to the zoo there are still 3454 parking spaces in 15 different lots. EIR, 4.4.1.4. This represents an occupancy rate of the about 71 percent on weekdays and 46 percent on weekends</p>	<p>AL-11 The design of the Centennial Bridge is governed by the Secretary of the Interior's Rehabilitation Standards, which state that the design of the proposed bridge must be differentiated from the historic Cabrillo Bridge.</p> <p>As indicated in Section 4.3.3.1a, the proposed Centennial Bridge would result in significant visual impacts related to architectural style conflicts between the proposed modern bridge and the existing historic context.</p> <p>AL-12 As indicated in Section 4.4, the existing pedestrian/vehicular conflicts are a potential safety hazard in addition to slowing traffic. The Balboa Park Master Plan and the Central Mesa Precise Plan also identify reduction of pedestrian/vehicular conflicts as goals. Therefore, one of the purposes of the project is to reduce the conflicts between pedestrians and vehicles.</p> <p>AL-13 As indicated in the project description in Section 3.4.3.1, the purpose of the proposed Centennial Bridge is to reroute vehicular traffic flow to enable the Plaza de California, El Prado, Plaza de Panama, and the Mall to be dedicated to pedestrians.</p> <p>The proposed parking fees are based on the Parking Structure Financial Projections Report, which has been added to the EIR as Appendix D-3. This report determined the proposed fees based on maintenance and operation costs associated with the parking structure and trams. Management of the parking structure is not an environmental issue to be addressed in accordance with CEQA.</p> <p>AL-14 Comment noted.</p> <p>AL-15 Comment noted.</p> <p>AL-16 This comment correctly states the conclusion in the EIR regarding the adequacy of parking spaces under the existing and future conditions. While the project would have one significant mitigable traffic impact, this impact is not related to paid parking. The cumulative year 2030 traffic impact at Presidents Way/Centennial Road would occur due to the rerouting of traffic through this intersection and the traffic control (i.e., stop sign) configuration at this intersection. Refer to Section 4.4.2 for additional information.</p> <p>Comment noted.</p>
--	---

LETTER

RESPONSE

(using the figures in Table 4.4-4 minus Zoo parking). Even including the zoo parking lot the available Balboa Park parking is about 76 percent overall. Not only that but these 15 parking lots are spread over Balboa Park making sure that people using the park have a chance of parking somewhere close to where they wish to visit. The suggested project seeks to combine several parking lots on the central mesa that will result in more congestion around the paid parking lot.

The EIR notes several times that there is sufficient parking in the park. In fact, the paid parking garage will only increase the parking spaces by 273 spaces--some of which will be dedicated to ADA spots. This is not significant considering the total number of spaces available--not to mention all the free parking on Park Boulevard to the east of the park. It is also not significant considering the cost to the people of San Diego.

AL-17 B. Paid Parking in Balboa Park is a Bad Idea

There is no excuse for introducing paid parking into Balboa Park. This is simply a ploy to give developer/businessmen another money making scheme. First, someone gets to build the garage and make a profit. Then someone gets to manage the parking and make a profit. The way it is presented there won't even be new employment opportunities as machines will do almost all the work and the profits will not be used for the city or the park patrons except to install a paid parking garage in place of free parking lots. It's one thing to make people pay for government services and a totally different thing to let private business people create those services in place of free ones and then make the people pay.

Paid parking will set the tone for making the park an elitist experience as low income people will be less likely to use the park if there is a parking fee. It is not acceptable to write the lower income people off by saying they can simply park farther away and walk to the park if they can't pay. That is separate and not equal treatment by the city. This issue was not sufficiently analyzed by the EIR and will represent a blight on the park.

AL-18 C. The EIR Failed to Analyze the Impact Paid Parking will have on Employees

The EIR is particularly harsh in its depiction of park employees and volunteers using parking spaces--as if they are not people entitled to park somewhere when they come to work to make the park work. I suggest that since the parking is not fully utilized anyway this is not a real problem.

However, changing employee parking will cause problems. Presently employees and volunteers enjoy free and abundant parking close to their employment. If they are forced to pay \$5.00 a day for parking this will add about \$1000 a year to their cost of employment (\$5.00/day x 5 days a week x 4 weeks a month x 12 months a year). This is an unreasonable expense to expect employees to pay. If employee and volunteer

AL-17 Comment noted. See response to comment AK-3.

AL-18 Comment noted.

Conclusions regarding employee parking patterns are based on the Parking Demand Study (see Appendix D-2). Physical changes to employee parking are addressed in Section 4.4 of the EIR and were determined to be less than significant given that adequate free parking would be available within Balboa Park.

Parking impacts to surrounding neighborhoods were evaluated in Section 4.4. As indicated in that section, the project would not increase the demand for parking and would increase the parking supply. Thus, the project would not result in increased parking demand within surrounding neighborhoods and the project impact to neighborhood parking would be less than significant.

LETTER

RESPONSE

parking is a problem it can much easier be resolved though dealing with employees and volunteers and their unions directly.

This issue will spill over to the neighborhoods surrounding the park as well (see below). At present many people park in these neighborhoods daily and walk to Park Boulevard and take the bus downtown rather than pay the parking fees downtown. The EIR never addressed this issue or this possible impact on the neighborhoods yet, if employees must start paying for parking, it is certain that some of them will wind up parking in the neighborhoods.

Changing the parking rules for employees will require formal interactions with some of the employees exclusive representative(s)--unions. The city may not unilaterally change working conditions without resolving the changes with the union. Changing parking locations and cost of parking are certainly working conditions that will fall under this doctrine. This will undoubtedly lead to lawsuits and tie up the issues for years.

In general, the EIR did not fully analyze the impact that paid parking will have on labor relations and the employees and volunteers of the park and this will be a significant issue that must be resolved. Because the EIR was silent on this issue then the plan cannot go forward until it is resolved.

AL-19

D. The EIR Failed to Analyze the Impact that Paid Parking will have on the Zoo Parking Lot

The zoo has 2924 parking spaces in its lot. These are free spaces within close walking distance to the park. At present it appears to be at full capacity on weekends and about 93 percent capacity on weekdays according to the EIR.

If there is paid parking in the park it must be assumed that many of the people will seek unpaid parking in other places--the closer the better. This will cause competition between people wanting to park to visit the zoo and people wanting to park to visit the park. The zoo must be expected to take action to protect its parking spaces which will cause tension between the city and the zoo.

The EIR did not analyze this situation properly. The most it did was to suggest it didn't have to consider the problems caused by illegal parking. That is not an answer because the situation will result in problems for a public entity's parking and that is an exclusion to the illegal parking disregard.

The city will have to deal with the zoo sooner or later and the result will not make it better for the people using the park.

IV. Parking in Neighborhoods around Balboa Park

AL-19 The project parking analysis determined that adequate parking would be available within Balboa Park (Section 4.4.4).

The trip distribution analysis for the project was done taking into consideration the effects of a paid parking structure. The displaced 125 patrons would be expected to park at the Federal/Aerospace parking lot and/or at Inspiration Point parking lot which are both currently underutilized and closer to the core of the Park than the Zoo parking lot.

Any decisions regarding the status of the Zoological Society's parking lot is outside the scope of the project and is subject to the terms and conditions of their lease agreement with the City.

LETTER

RESPONSE

AL-20

This issue was almost totally dismissed by the EIR. All of the analysis--thousands of pages--talked about traffic, and to a much lesser extent parking, on the main streets surrounding the park but failed to consider the effects that will occur should there be paid parking in the park. The EIR made a short dismissal of this issue by stating that there would be no increased demand for parking outside the park, however, this was not based on any analysis that can be considered one way or the other. Indeed, there was no discussion of neighborhood parking in the EIR.

There are two main neighborhoods that border the park and both are impacted by park users needing parking--even now with abundant free parking in the park. These are the neighborhoods to the west of the park radiating out from Laurel street and the neighborhoods north of the park that are north of Upas.

My neighbors and I live in the north neighborhood and we know that there are many days, even with free parking in the park, that people park on our streets. At present this is not a problem but almost all of us see this as a potential big problem if paid parking is implemented in the park. Many people will seek free parking before resorting to paid parking. As more people seek the free parking in the neighborhoods we will ultimately have to seek restricted parking in the neighborhoods and that is not good for the people using the park and it is not desirable by the neighborhood people who overwhelmingly enjoy the people using the park and want to be good neighbors. Yet, if you can't find parking at your own home you've got to do something.

This issue could well wind up in litigation because of the EIR's failure to address it properly. The issue was brought up at the open meeting for raising issues to be considered in the EIR--I brought it up myself.

CONCLUSION

AL-21

San Diego is a beautiful city and has Balboa Park, one of the most beautiful city parks in the United States. We should work to display the art and culture of our region in the best way possible in Balboa Park to celebrate the centennial. To the the extent reasonable we should upgrade streets and plants and parking to make the park as attractive as possible and even more conform to the vision set for the park by past people of San Diego.

However, this Environmental Impact Report makes it clear that the Bridge to Paid Parking and paid parking are a bad idea and that we should not spend millions and millions of our money to do something that will irrevocably make Balboa Park a worse place to visit for the people who live here, the people who will visit and for generations to come.

And, thinking about the millions of dollars to be spent by the people of San Diego, remember that there is a sports team in town--Chargers--who, having not lived up to their prior agreement, asked for a new stadium to play in insisting it

AL-20 See response to comment AL-18.

AL-21 Comment noted.

LETTER

RESPONSE

will not cost the people of San Diego anything, who then changed their mind and now it is going to cost us millions. We do not need to be engaging in deals that shouldn't cost us anything but will cost us millions when past bad deals cost us more than we can pay and we are going to be paying for them for a really long time.

There are fatal faults in this EIR but even beyond that a fair reading of the EIR makes it clear that this is not a good project for San Diego to undertake now or in the future.

Respectfully Submitted,

/s/ Jay Coffman

William G. "Jay" Coffman

cc: Council District: 2 Kevin Faulconer (by email)
Council District: 3 Todd Gloria (by email)
SOHO (by email)
Various neighbors and newspapers to be determined

LETTER

RESPONSE

Letter AM

From: [Kyle Colley](#)
To: [DSD EAS](#)
Subject: Kyle colley
Date: Sunday, March 11, 2012 3:42:44 PM

AM-1 *I'm writing to share comments on the Plaza de Panama project Draft EIR.*

I think this document shows that the Plaza de Panama project is the only solution that is feasible for the park. The main goal for doing something in Balboa Park is to return park space to people and get cars out of the plazas. Other alternatives that were studied only offer partial solutions and in some cases cause more problems than they solve.

The reality is that most of the people that visit Balboa Park get there by car. We can't just pretend that cars don't exist and cut off access to the park. The Plaza de Panama project is the only project that gives us our plazas back, increases park space AND addresses the reality of how people get to the park.

Sent from my iPhone

AM-1 Comment noted.

LETTER

RESPONSE

Letter AN

From: [Michael Curtis](#)
To: [DSD EAS](#)
Subject: Plaza de Panama Project
Date: Saturday, January 28, 2012 11:37:10 AM

AN-1

Sirs:
I support the Plaza de Panama project. It is a well thought out, elegant design, looking to a more useful future for the south eastern section of Balboa Park.
Michael Curtis
6939 Forum Street
San Diego, CA 92111-3324
858-278-3280

AN-1 Comment noted.

LETTER

RESPONSE

Letter AO

From: architect@cov.net
To: [DSD EAS](#)
Subject: Balboa Park Plaza De Panama
Date: Friday, February 03, 2012 9:02:21 AM

- AO-1 This entire project is completely without merit. Bollards such as those added near the Natural History Museum would allow the pedestrian plaza to be created whenever and however it was desired or needed.
- AO-2 To eliminate hundreds of free parking spaces to build a pay to park structure is yet another example of excess. We attend many of the concerts (Spreckels Organ, etc) in Balboa Park and would likely just park another 100 yards away vs. pay to park. The greatest likelihood is that this will become another boondoggle, another large debt around our collective necks with little or no hope of being supported from fees.
- AO-3 The parking structure could also become a de-facto homeless shelter for most of the year, unless there is a large investment in keeping the lowest levels monitored and secure with on-site security.
- AO-4 All this is happening when the City was looking at suspending the contract for the Civic Organist, which is virtually nothing in comparison to the financial liability the City will assume.
- AO-5 I see no advantages in pursuing this development option.
 Norm DeWitt, Architect
 3779 Milan St.
 San Diego, Calif.
 92107

- AO-1 Comment noted.
- AO-2 Comment noted.
- AO-3 Comment noted.
- AO-4 Comment noted.
- AO-5 Comment noted.

LETTER

RESPONSE

Letter AP

From: [Alan Francisco](#)
To: [DSD EAS](#)
Subject: Project 233958 Balboa Park Plaza de Panama
Date: Wednesday, February 08, 2012 6:36:51 AM

Planner Shearer-Nguyen:

AP-1

I'm Alan Francisco, a Southeastern San Diego resident. For Plaza de Panama in Balboa Park I support the No Project (No Development/Existing Conditions) Alternative (Alt 1).

AP-2

The EIR seems poorly presented: starting at 4.0, Page 4-1, third paragraph, several pages have spacing errors. On page 4.6-13, 4.6.3, Issue 2: Sensitive Habitat, bullet item: "plans, polles, regulations" has an apparent misspelling. Thank you for your time.

Sincerely
 Alan Francisco

AP-1 Comment noted.

AP-2 These typos have been corrected in the Final EIR.

LETTER

RESPONSE

Letter AQ

From: [Sharon Gehl](#)
To: [DSD EAS](#)
Subject: Comments on Balboa Park Plaza De Panama, Project No. 233958/SCH No. 2011031074
Date: Wednesday, March 07, 2012 4:15:32 PM

Comments on Balboa Park Plaza De Panama, Project No. 233958/SCH No. 2011031074

AQ-1 The EIR on the Balboa Park Plaza De Panama project covers this project and the alternatives extensively, but two areas of the report could be improved. In talking about the historic aspects of the project, no mention was made of the mitigating effect of planting additional trees to further block the view of the Centennial Bridge; and in talking about removing a small section of the Cabrillo Bridge railing, no mention was made of the mitigating effect of returning large areas of the central mesa to the historically correct pedestrian use.

AQ-2

AQ-3 After reading the executive summary and the pertinent sections of the report, I think that the best alternative is the Plaza De Panama project; because it would make the west El Prado pedestrian only, like the east end of El Prado. It would also once more make the Plaza De Panama and the Plaza De California usable spaces, like the popular plaza at the east end of El Prado. You can see that visitors to Balboa Park prefer it without cars when you zoom in on the Google Map view of El Prado. More people are walking around the car free east end, than the west end where people have to avoid cars. The only way to get cars off El Prado is to put automobile access and parking behind the museums, the way they did on the east El Prado in 1972.

I also consider the Plaza De Panama Project the best alternative because it is best in terms of preventing traffic problems both within the park and in the surrounding neighborhoods. Even the alternative of doing nothing will make traffic worse as the number of visitors increases year by year. That is why the community groups to the west of the park prefer the Plaza De Panama alternative.

Sharon Gehl

4301 Hermosa Way

San Diego, CA 92103-1216

619-299-9606

stehlb@cox.net

AQ-1 As indicated in Sections 4.3.2.1a and 4.3.2.2a, the landscape plan for the project includes substantial vegetative screening (primarily eucalyptus trees) near the Centennial Bridge and within Cabrillo Canyon (see Figure 4.3-20, Key Vantage Point 1A Photo Simulation). Although it has partially been obscured by the eucalyptus forest, the relationship of Cabrillo Bridge to the California Quadrangle complex is one of the most important designed relationships in the Balboa Park NHLD (see Section 4.2.2.1 for more information). The project would partially disrupt this relationship by constructing the Centennial Bridge around the west and south side of the old Fine Arts Museum section of the California Quadrangle. Therefore, even with screening, the impact to a historical resource would remain significant. Refer to Sections 4.2.2.2 (Centennial Bridge) and 4.2.2.3, and Historic Resources Technical Report pages 146 to 147 (Appendix B-1) for further historic information.

The project would also result in a significant architectural character impact related to the visual conflict between the proposed Centennial Bridge, and the existing historic Cabrillo Bridge and California Quadrangle Complex. While the proposed screening of the Centennial Bridge would minimize a visual impact pursuant to CEQA, it would not avoid the impact related to the change in the historic visual and spatial relationships, as described above.

AQ-2 The restoration of Park areas to pedestrian uses would not mitigate the project's historical resource impact, as the Centennial Bridge would still be inconsistent with SOI Rehabilitation Standards 2 and 9, and would continue to constitute a substantial adverse change to an historical resource. Refer to Historic Resources Technical Report Section IX, Conclusion (Appendix B-1).

AQ-3 Comment noted.

LETTER

RESPONSE

Letter AR

March 15, 2012

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

RE: Comments for the Plaza de Panama Project Draft EIR

Dear Ms. Shearer-Nguyen:

AR-1

I am writing to share my support for the Plaza de Panama Project proposed by Dr. Irwin Jacobs and the Plaza de Panama Committee. I recently heard a presentation on this project, including the alternatives studied in the Draft EIR, and believe that this project is our best hope of reclaiming Balboa Park's grand plazas for public use once again.

The Draft EIR studied 13 alternatives to the proposed project, and it appears that none of them offers an impact-free way to achieve the goal of reclaiming public spaces in the park for people. Only the Plaza de Panama Project will clear vehicles from the entire core of the park and still allow cars to enter the park from the west. I understand that the Centennial Bridge does result in a historical impact, but its visibility will be limited and it serves an important functional purpose.

The project does a very good job of beautifying the park and making it more accessible to visitors, while still paying attention to the logistics of getting visitors to and from the park. The alternatives studied each have benefits and impacts, but none of them offers a complete solution.

I look forward to the day when this project is finished and we can all enjoy a car-free park experience.

Sincerely,

Vance A. Gustafson
Point Loma

AR-1 Comment noted.

LETTER

RESPONSE

<div data-bbox="842 224 1022 285" data-label="Section-Header"> <p>Letter AS</p> </div> <p data-bbox="228 280 722 386">Submitted via email on March 20, 2012 by Allen Anthony Hazard 1824 Sunset Blvd. San Diego CA 92103 BALBOA PARK PLAZA DE PANAMA Project No. 233958/SCH No. 2011031074</p> <p data-bbox="228 407 848 472">BALBOA PARK MASTER PLAN AMENDMENT, CENTRAL MESA PRECISE PLAN AMENDMENT, AND SITE DEVELOPMENT PERMIT to implement the Balboa Park Plaza de Panama Project ("proposed project").</p> <p data-bbox="102 493 170 521">AS-1</p> <p data-bbox="228 493 873 574">The project includes the rehabilitation of the Plaza de Panama consistent with the 1915 through 1935 design of a ceremonial plaza and gathering space by eliminating vehicle traffic from Plaza de California, El Prado, Plaza de Panama, and the Mall. Project components include:</p> <ol data-bbox="228 597 890 1084" style="list-style-type: none"> 1. Plaza de Panama. Eliminate automobile traffic from the Plaza de Panama and adjacent promenades and remove parking from the Plaza. – SUPPORT. 2. Centennial Bridge and Road. Construction of a new two-way bridge/road starting at the east end of the Cabrillo Bridge and continuing through the eucalyptus grove around the southwest corner of the Museum of Man. DO NOT SUPPORT 3. Alcazar Parking Lot and Walkway. Redesign the Alcazar parking lot to provide additional accessible parking as well as passenger drop-off, museum loading, and valet. – DO NOT SUPPORT 4. El Prado and Plaza de California. Allow for pedestrian use of El Prado and Plaza de California by re-routing traffic to the bypass road and bridge. DO NOT SUPPORT. Form Revised 8/07 5. The Mall and Pan American Promenade. Reclaim both the Mall and Pan American Road for pedestrian access by rerouting vehicle traffic west of Pan American Road. 6. Parking Structure and Roof-top Park. Construct a new parking structure with a roof-top park and garden at the location of an existing Organ Pavilion surface parking lot. The new multi-level underground structure would consist of 265,242 square-feet with 798 parking spaces on three levels. The new rooftop park would consist of 2.2 acres. DO NOT SUPPORT. <p data-bbox="102 1117 170 1144">AS-2</p> <p data-bbox="228 1105 869 1170">There are many items wrong with this project, my letter focuses on the Historic Preservation Aspects, I am guided by and defer to our State Preservation Officer Wayne Donaldson's very strong reservations about this project -</p> <p data-bbox="228 1192 821 1232">CALIFORNIA STATE PRESERVATION OFFICER WAYNE DONALDSON CONCERNS REGARDING THIS PROJECT AND THE EIR:</p>	<p data-bbox="1062 505 1352 532">AS-1 Comment noted.</p> <p data-bbox="1062 1117 2003 1268">AS-2 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>

LETTER

RESPONSE

- At great risk is the Cabrillo Bridge, its setting, the spatial relationships and special elements which define the National Historic Landmark District of Balboa Park.
- The Cabrillo Bridge was intended as the primary entrance to the 1915 Exposition, the bridge remains as the ceremonial entry.
- The Cabrillo Bridge, California Quadrangle, including the Fine Arts Building along with the canyon landscape, constitutes the main front entry to Balboa Park and the NHL district. It is the primary historic viewscape and sets the tone, conveys the setting, contains the signature elements and major character defining elements of the district. It is also the area of the Balboa Park NHLD that retains the very highest degree of original integrity, near 100%. This is the most sensitive possible area and alterations should be strictly avoided.

"The proposed plan renders the site unable to convey its original design intent. The substantial and many changes represent elements that are incompatible, did not exist during the period of significance and prevent the district from retaining the qualities that resulted in the NHLD designation".

"A few of the inappropriate alterations to the district:

- Demolition of 82 feet of the Cabrillo Bridge
- Encasing and hiding from view the major character defining features of the front entrance of the Spanish fortified hilltop town.
- This incompatible intrusion of a new bridge element that would be attached to the iconic and historic Cabrillo Bridge.
- Insertion of new buildings, retaining walls, changed historic landforms, removal of historic plant materials, removal of the historic hardscapes and curbs.
- The significant introduction of new plants, trees and hardscapes not present during the period of significance or available during that period.
- The new bridge funnels traffic into what would become a heavily modified Alcazar Garden parking lot by changing the landscape, re-grading the land form and altering the garden's relationship to its setting, as well as adding multiple uses and small buildings for valet use.
- The introduction of a new two-lane roadway road that bisects the historic core into two spaces, something that has never existed and was never designed to be. This is achieved by excavating a very large ravine containing the road, bisecting the historic central mesa, which includes the addition of retaining walls and fills significant parts of Palm Canyon, altering the historic space and land forms irreversibly.
- The road continues into a three story partially underground parking lot that abuts directly against the historic Speckles Organ Pavilion. This parking lot will then have numerous new buildings on top along with grass areas. None of these elements occurred during the period of significance and represent materials and methods of construction unknown during that period. It irreversibly changes the relationship of the organ pavilion to the landscape and severely diminishes its prominent setting.

LETTER

RESPONSE

<p>AS-3 I would, in the strongest words possible, recommend that the San Diego Planning Community, Historic Resources Board and City Council reject the following proposed plans to Balboa Park.</p> <p>REJECT: Centennial Bridge and Road REJECT: The Redesign of the Alcazar Parking Lot and Walkway. REJECT: Parking Structure and Roof-top Park</p> <p>AS-4 I also have very strong feelings against the non-historic proposals (water features, etc.) regarding non-historic elements into the Plaza de Panama.</p> <p>I take issue with 4.3.3 – neighborhood character and architecture – the proposed bridge DOES contrast too greatly with the adjacent development (Balboa Park and Bankers Hill).</p> <p>The bypass bridge IS too visible from several areas – Jacobs/Sanders claim that tall trees will mostly hide the new ugly bridge – really? How will it take them to grow, what if they fall over from neglect, storms, etc. – can we then tear the bypass bridge down?</p> <p>Create a negative aesthetic site – YES, the bypass bridge is very very ugly (not to mention inappropriate, per the National Trust, State Office for Historic Preservation, SOHO, etc.).</p> <p>Bulk, scale, materials, style – NO NO NO AND NO. Too big, out of scale, non-historic materials and UGLY “style”.</p> <p>AS-5 The EIR states (4.3.3.) that the bridge, massive parking garage would be inconsistent with the SOI Rehab Standards 2 and 9 – contributing to an adverse change to a historic resource. These impacts would be significant and unmitigable – THEREFORE, YOU MUST REJECT THE JACOBS/SANDERS BALBOA PARK PROPOSAL AND CONSIDER THE ALTERNATIVES IF THE CITY WANTS TO FREE THE PLAZA DE PANAMA OF CARS – some alternatives looked at no cars on the Cabrillo Bridge, others examined placing a parking garage at the zoo or outside the main park, also – having a streetcar run down 6th Avenue should be explored.</p> <p>Again, there are many many Historic Resources concerns with the proposed bridge (and parking garage). PLEASE BYPASS THE BYPASS NOW AND TURN THIS TERRIBLE PROPOSAL AWAY FOREVER!</p> <p>Allen Hazard</p> <p>1824 Sunset Blvd San Diego CA 92103</p>	<p>AS-3 Comment noted.</p> <p>AS-4 Comment noted.</p> <p>AS-5 Comment noted. The EIR includes a reasonable range of alternatives to 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 in compliance with CEQA Guidelines Section 15126.6(a). It is noted that while the project does not include a streetcar, it would not preclude future use of streetcars.</p>
--	---

LETTER

RESPONSE

Letter AT

From: hemlockt@cox.net
To: [DSO EAS](#)
Subject: Plaza de Panama project
Date: Tuesday, March 20, 2012 8:20:39 PM

Dear Ms. Shearer-Nguyen,

AT-1

I strongly support the Plaza de Panama project to remove auto traffic from the main plaza in Balboa Park. The project itself is a common sense solution. A bridge addition to take traffic around the Museum of Man does not interfere with any historical structures. Nothing historical will be removed. The small , but very vocal group that is in opposition to the project, keeps showing a 100 year old conceptual drawing of what the building and bridge was to look like, and it isn't even an actual representation of what was eventually built!

The idea of a garage for additional parking is a good one. However, I don't think that charging a fee to park is a good one, unless the fee is kept nominal. Like the Coronado bridge, a small fee collected worked fine. That idea could work with the garage as well.

I hope the Plaza de Panama project should be approved. It's the only one that meets and solves the traffic through the park problem.

Thank you.

Sincerely,
 Thomas Hemlock- Hillcrest resident

AT-1

Comment noted.

LETTER

RESPONSE

Letter AU

6915 Ofria Court
San Diego, CA 92120
619-286-5464
baking7@att.net
January 30, 2012

RECEIVED
FEB 01 2011
Development Services

Development Services Department
City of San Diego
Development Services
1222 First Avenue, MS 501
San Diego, Ca 92101-4155

ATTN: E. Shearer-Nguyen, Environmental Planner
RE: BALBOA PARK PLAZA DE PANAMA/Project Number 233958/SCH No. 2011031074

Dear Sir:

AU-1 The purpose of this letter is twofold: To oppose a parking structure at the location of the existing Organ Pavilion surface parking and to suggest the site of the current Starlight Bowl as an open multilevel parking structure.

AU-2 Item 1. An underground parking structure is an anomaly for the park. Paid parking shows elitism. Heavy duty construction will disrupt the park. This is an area of many seismic faults. Insurance and security are factors to also consider.

AU-3 Item 2: **The Starlight Bowl location should be considered for a multilevel, open parking structure**, car entrance from the north, elevators to take people to where the present ticket office is located.

A. Starlight Bowl has filed for bankruptcy. If revived, it will only do so on large financial support from city coffers. The expression, "Don't beat a dead horse" applies here.

B. Starlight Bowl has little historic significance. In 1967, it was even abandoned for a time*.

C. It does not make economic or artistic sense to revive Starlight Bowl as a theater. It served a purpose in the distant past. Theater is well represented in Balboa Park. Twenty-three local theaters were listed in the "Playbill" section of The Union-Tribune on January 19, 2012, many within five miles of the park (See attached list). That list included an additional 12 theaters in San Diego County. This is a winter listing and in the summer, additional venues operate. Why go sit on cold, hard seats at Starlight to hear artists (if you can get them to come) to be interrupted by jet noise?

D. Starlight Bowl is located on the edge of the park. A multilevel open parking structure would serve the park well in that location. The hole is already there. Soil compaction is done.

AU-1 Comment noted.

AU-2 The EIR addresses the environmental impacts related to construction of the subterranean parking structure, including excavation and seismic hazards. As indicated in Section 4.8, impacts related to seismic faults would be less than significant. Construction activities are described in Section 3.8 and are analyzed throughout Section 4.0 to 8.0.

In accordance with CEQA Guidelines Sections 15064(e) and 15131, insurance and security matters are not environmental issues and the EIR shall not treat economic or social changes as significant effects on the environment.

AU-3 The EIR includes a reasonable range of alternatives in compliance with CEQA Guidelines Section 15126.6(a).

This alternative would result in significant impacts related to the demolition of a historic structure. Starlight Bowl, historically known as the Ford Bowl, was built for the 1935 California Pacific International Exposition. It is a contributing structure to the National Historic Landmark District. Demolition of this structure is not consistent with any plans for Balboa Park and would constitute a significant adverse impact to the Park. The Starlight Bowl is operated by the San Diego Civic Light Opera Association. It is noted that their financial situation has no bearing on the viability of the historic resource.

LETTER

RESPONSE

AU-4

Heavy duty equipment and construction would have a minimal impact on the daily use of the park during construction.

Using the Starlight Bowl site for a multilevel parking structure would obviate the need for a parking structure where the Organ Pavilion surface parking now exists. That area could be the desired open park like setting without resorting to underground parking. Three rows of parking at the south end should be maintained for handicapped and special permit parking with the complete far south curb designated as a loading zone for large vehicles to make deliveries.

Respectfully submitted,



Bernadine King

Copies to: All members of the San Diego City Council, 202 West C Street, San Diego, CA 92101,

Additional copy to: Save Our Heritage Organisation

2476 San Diego Avenue · San Diego CA 92110

Phones: (619) 297-9327; (619) 297-7511

Fax: (619) 291-3576

email: SOHOSanDiego@aol.com

*Christman, Florence, The Romance of Balboa Park, Crest Offset Printing Company, National City, CA, 1985, San Diego Historical Society

AU-4 Comment noted. See response to comment AU-3.

LETTER

RESPONSE

Theater Listings, San Diego Union Tribune, January 19, 2012, PLAYBILL

Local San Diego Theaters

Horton Grand Theatre
 Cygnet Theater
 Diversionary Theater
 Old Globe (Balboa Park)
 Bikbox Theater
 Joan B. Kroc Theatre
 Casa del Prado (Balboa Park)
 National Comedy Theater
 Roar Theater
 Mandell Weiss
 Café Libertalia "Theatre in the Back"
 Scripps Ranch Theatre
 Sheryl and Harvey White Theatre(Balboa Park)
 La Jolla Playhouse
 Marriott Courtyard
 House of Blues
 S.D. Civic Theater
 Lyceum Space Theater
 Balboa Theatre
 San Diego State University
 Valley View Casino Center
 The 10th Ave. Theatre
 Sheila & Hughes Potiker Theatre

County Area Theaters

North Coast Repertory Theater
 Lambs Players Theatre
 Welk Resort Theater
 California Center for the Arts
 Bob Burton Center for the Performing Arts
 El Nopal Restaurant Theater
 Pow PAC Poway Community Theater
 Moxie Theatre (Rolando)
 PaccoArts at the Patio Playhouse Infinity-Pala
 Harrah's Rincon (Valley Center)
 Stagehouse Theater (El Cajon)

The above is not a complete listing of all venues.

Notable absent:

Marie Hitchcock Puppet Theater (Balboa Park), PLNU Crill Performance Hall and summer only venues.

LETTER

RESPONSE

Letter AV

William S. Lewis Jr, Architect, FAIA
2029 Balboa Avenue
Del Mar, CA 92014
858-755-2263

March 22, 2012

Re: EIR for Balboa Park Plaza de Panama Project

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,

Enclosed is an alternative to the Plaza de Panama Project by the William S. Lewis and his design team. This alternative addresses the traffic and parking problems identified by the city and creates solutions that will allow for the preservation of the historic park while providing for its future growth.

The Lewis plan allows for two-way vehicular traffic and pedestrians to continue across the Cabrillo Bridge. This plan incorporates an underground parking structure with capacity for up to 700 cars in the Plaza de Panama. The garage has three vehicular access points, two from North Rim Road, and one from South Rim Road. The plan calls for the expansion and straightening of the northern service road to create the North Rim Road, which will allow access to the parking garage from the Cabrillo Bridge, as well as immediate access to the Old Globe and the museums. The expansion of the southern service road of the International Cottages will create the South Rim Road, which connects Presidents Way to the Pan American Plaza and to the Plaza de Panama parking garage. Existing parking lots will be maintained with the addition of an arbor of canopy trees and at the perimeter a landscaped earthen berm to decrease the visibility of cars in the park.

ADA parking will be incorporated into the parking garage as well as every lot in the park rather than in one designed area. This plan eliminates the need for paid parking and the continual financial commitment of maintaining a tram system.

This plan is designed to highlight the pedestrian experience. The entire park is easily accessible to pedestrian who will no longer have to cross traffic to get from the Pan American Plaza to the Plaza de Panama. Cars are kept out of sight and pedestrians are given the right of way by removing cars from the visible core and sending them underground.

This plan reinforces Goodhue's original design and image for the park by respecting his vision for the People's Park while incorporating the contemporary needs of San Diego. The Alcazar Gardens will be restored to Goodhue's original design complete with the pergolas that once stood where the parking lot sits today.

This is a complex project; please contact Bill Lewis during the professional review to discuss further details of the project.

Sincerely,
William S. Lewis Jr, Architect, FAIA

AV-1

AV-1

As required under CEQA Guidelines Section 15126.6(a), the EIR considers and discusses a reasonable range of alternatives. Features of this alternative are addressed in other alternatives, namely the Tunnel Alternative, which is addressed in full detail in the EIR, and the Old Globe Way Access and Quince Street Access Alternatives which were considered but rejected. As a result, it is unnecessary to revise the EIR to include a full discussion of the alternative. However, the following is a summary analysis of the alternative's potential impacts.

The EIR concludes that the proposed Balboa Park Plaza de Panama project would have significant unmitigated impacts with respect to land use (inconsistency with historical preservation policies); historical resources (impact of Centennial Bridge to the NHL, in particular the relationship of Cabrillo Bridge and California Quadrangle); visual effects (introduction of a modern element, the Centennial Bridge, into a historic setting); and noise (temporary construction noise impacts).

Based on review of the attached plans, the suggested alternative would likely result in greater impacts in each of these four areas.

Thus, significant unmitigated project impacts related to land use, historical resources, visual quality, and noise would likely be greater under this alternative.

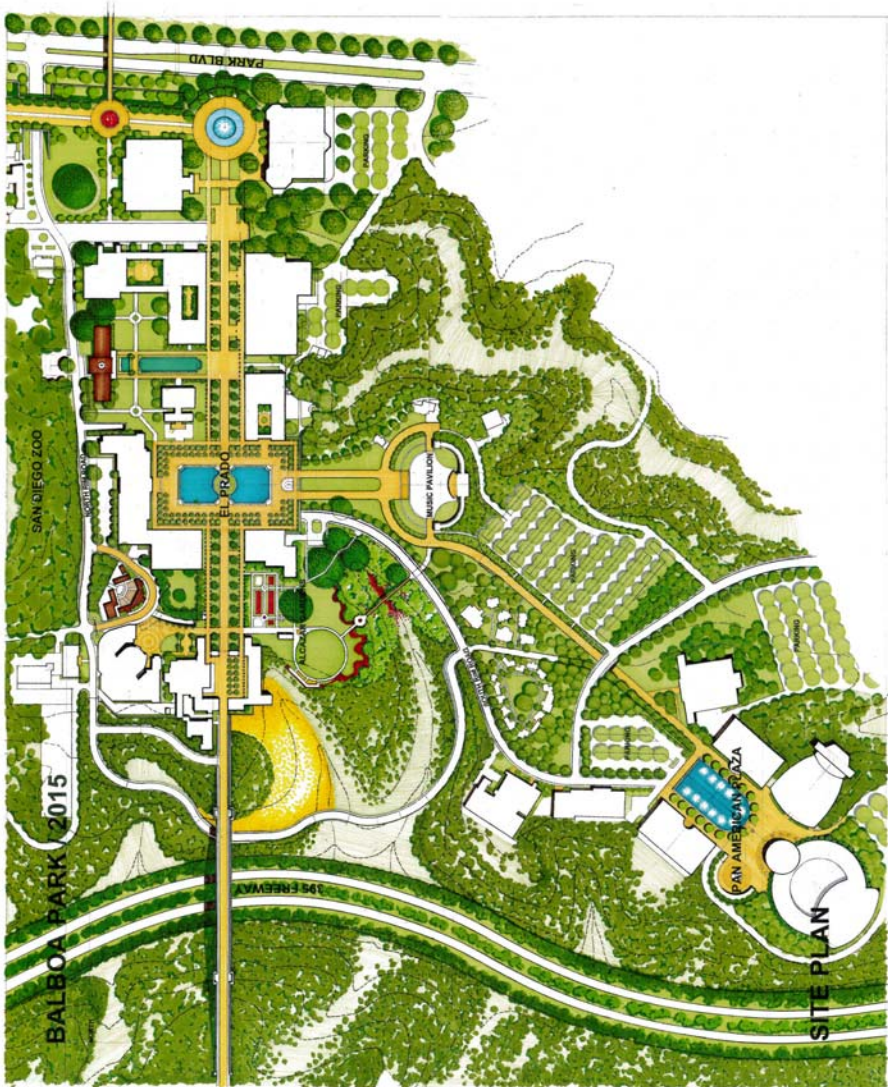
Additionally, constraints that could affect the feasibility of this alternative include the following:

- Encroachment into Zoo leasehold
- Encroachment on Old Globe Theatre
- Road in front of the Old Globe's Festival Stage for a primary access into the new garage posing serious issues because the road functions as a cueing/intermission space.

In summary, while the suggested alternative would meet most of the basic project objectives, it would not avoid or substantially lessen any of the significant effects of the project and is potentially infeasible.

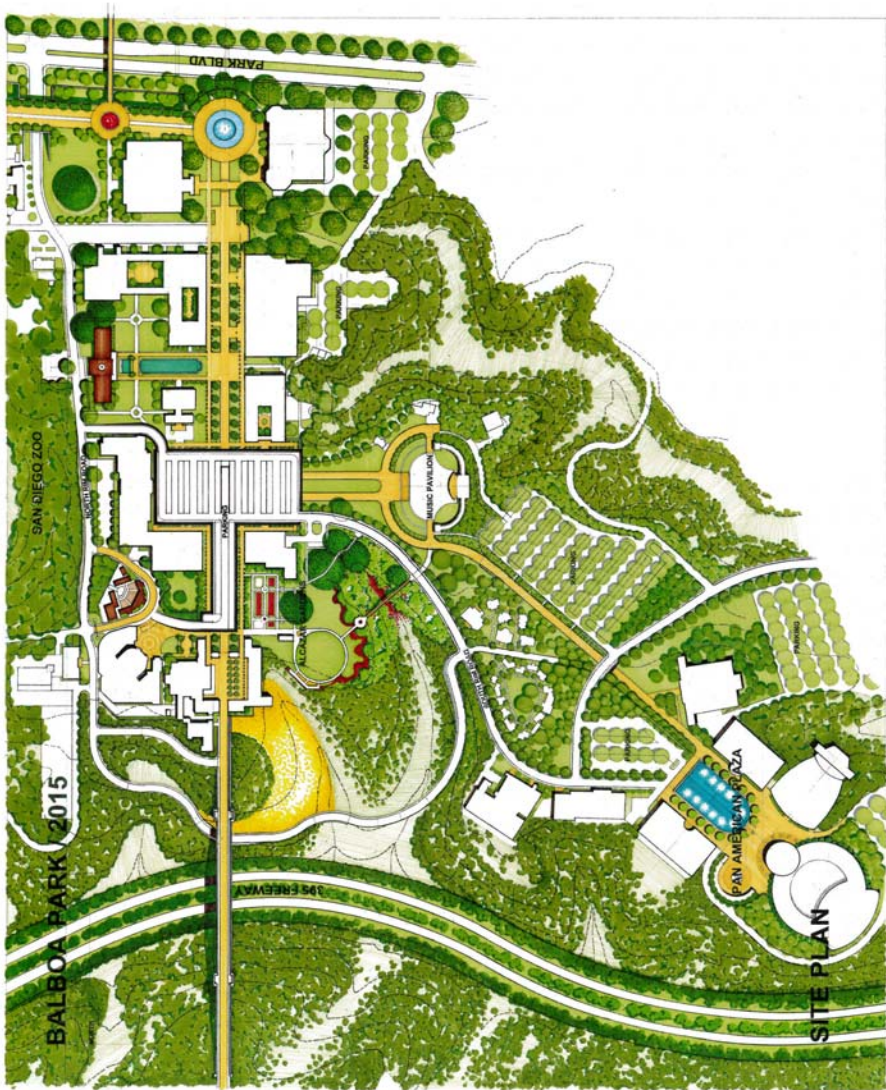
LETTER

RESPONSE



LETTER

RESPONSE



LETTER

RESPONSE

Letter AW

From: [Dennis Lusic / CPI LABS](#)
To: [DSD EAS; Councilmember Todd Gloria](#)
Subject: Balboa Park "Plaza de Panama" Draft EIR Comments
Date: Tuesday, February 14, 2012 1:38:27 PM

As a citizen of San Diego, I'd like to state my opinion regarding the Draft EIR referenced above:

- AW-1 1) I am totally AGAINST the so-called "Jacobs/Sanders" plan to build a bypass ramp off of the Cabrillo Bridge, as it would defile both the aesthetics and historical significance of the main gate entrance area into Balboa Park.
- AW-2 2) The proposed bypass ramp will loom very large...merely a few yards away from and above the St. Francis chapel - a silent, historical and SACRED place. The ramp will cast a large shadow over the few windows the ancient chapel now has, and cause vehicle noise and fumes to intrude on the countless religious ceremonies that are held there. The beautiful, tranquil Alcazar Gardens will also be ruined by having this bypass ramp looming right next to it!
- AW-3 3) I am equally opposed to the proposed construction of an underground parking structure outlined in the "Jacobs/Sanders" plan. This structure will eliminate and/or destroy both the Palm and Cabrillo Canyons - areas that we now enjoy as some of the greenest, most tranquil places in the city. Thousands of people walk in the Palm Canyon each week. This proposed parking garage would need to be paved above it's roof, removing invaluable green space in the Park, and adding a modern element that would make the central park/Houses of Hospitality area seem more like an airport, rather than a historic landmark.
- AW-4 I feel that the City should consider an alternative plan to the "Jacobs/Sanders" proposal - that which includes the following elements:
- 1) Automobile traffic through the Plaza should be completely eliminated, *regardless* of which plan is implemented. It is not very difficult for drivers to "go around" Balboa Park by using existing roadways. In time, people will get used to this. Why must we continue to treat Balboa Park as some form of express thruway? The majority of major urban parks do NOT allow car traffic to cut through them. I cite NYC and Boston as prime examples.
- 2) If additional parking is needed, I recommend that an underground lot be constructed immediately across from the Presidents Way / Park Blvd. intersection, where the Naval Hospital parking lots currently are. These lots are a mere 5 minute walk to the Prado, and a weekend shuttle service could also be provided to assist visitors. It makes a LOT more sense to build underground there, as the land is already paved over at street level - and this would pose no net loss of green space in the Park itself. I'd imagine that this ridiculously simple, common-sense solution would also cost the City a LOT LESS than the costly and destructive "Jacobs/Sanders" plan currently being rammed down our throats.

Thank you,

Mr. Dennis Lusic
 4465 Arch Street
 San Diego, CA 92116

AW-1 Comment noted.

AW-2 Noise studies confirm that overall noise levels in the Alcazar Garden would decrease as a result of the project because the proposed configuration would increase the distance between the travel lanes and the garden. The increase in noise at the southern edge of the garden would not be perceptible and therefore less than significant.

For similar reasons, noise impacts at the St. Francis Chapel would be less than significant. The traffic noise source would be moved from the north side of the chapel to the south as a result of the project. The project would not increase traffic adjacent to the chapel.

AW-3 Comment noted. The project would not destroy the Palm and Cabrillo Canyons. The project would construct the Centennial Bridge on top of the rim of Cabrillo Canyon and would add additional trees in Cabrillo Canyon, but it would not eliminate the canyon. The project would realign and extend the 1970s Palm Canyon Walkway.

The parking structure would be constructed at the existing Organ Pavilion parking lot, thus minimizing the loss of existing green space. In addition, the parking structure would be subterranean, with the surface being a park. Overall, the proposed project would increase the amount of usable parkland.

The project impact to the Balboa Park National Historic District is addressed in Section 4.2.

AW-4 The suggested alternatives are analyzed in Section 9.0. See response to comment AW-3 above regarding parkland.

LETTER

RESPONSE

Letter AX

From: [Sylvia Halboff](#)
To: [DSD EAS](#)
Cc: sylviahalfboff@cox.net
Subject: BALBOA PARK PLAZA DE PANAMA No.233958/SCH No. 2011031074
Date: Thursday, March 01, 2012 7:47:01 PM

AX-1

I am against desecrating the Laurel Street bridge and the Alcatraz garden. Instead I suggest making a second entrance from Park Blvd into the park and building a parking garage behind the Hall of Champions or filling in the Balboa Bowl and creating a garage there.
 Sent from my iPad

AX-1 Comment noted.

See response to comment AU-3. As required pursuant to CEQA Guidelines Section 15126.6(a) these alternatives were selected to provide a reasonable range of possible project designs which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project. Thus, this suggested alternative has not been added to the EIR analysis.

LETTER

RESPONSE

Letter AY

From: [Richard Nelson](#)
To: [DSD EAS](#)
Subject: Balboa Park
Date: Friday, January 27, 2012 5:22:46 PM

AY-1 I'm sorry, I couldn't pull up the EIR Report, however I have seen the Jacob's plan and I strongly feel it should be implemented. It would be wonderful if it could be completed by 1915. Thank you for asking for my input.

Richard Nelson
(619) 269-5947

AY-1 Comment noted.

LETTER

RESPONSE

Letter AZ

From: [Travis Newhouse](#)
To: [DSO EAS](#)
Subject: Plaza de Panama project in Balboa Park
Date: Tuesday, March 06, 2012 11:12:20 AM

Hi. I am writing to express my opinion about proposed project at Plaza de Panama in Balboa Park.

AZ-1

I strongly favor any alternative that eliminates cars from the Plaza de Panama and the Cabrillo Bridge, such as alternatives 3, 4, 5, 6 described here:

<http://sohosandiego.org/main/plaza13alternatives.htm>

Balboa Park is a unique and historic asset to San Diego. I feel it should be preserved and maintained as a park, suitable for people to enjoy and relax without the concern of motor vehicles. I do not think the historical architecture or the historic status of the park should be compromised to build a bridge to accommodate motor vehicles. I hope the city will have the vision to reduce motor vehicles in the park, and consider mass transit options to supplement and encourage alternatives to visit the park - there is currently only bus service from downtown trolley and train stations to reach the park.

Hoping the plaza will be car-free,
 Travis Newhouse

AZ-1 Comment noted.

LETTER

RESPONSE

Letter BA

From: [Elvi Olesen](#)
To: [DSD EAS](#)
Subject: EIR/BALBOA PARK
Date: Monday, March 19, 2012 12:08:37 PM

BA-1

While not 100% in favor of the 'Jacobs Plan' --I much prefer parking under the grass on the West side of the bridge and NO traffic on the bridge --except public transportation --- I vote for the former. I think it can get done. Clearly there is a change in the Park --a much needed one --- cars need to be out of the plazas.

elvi olesen
4156 Coutts Street
San Diego 92103

BA-1 Comment noted.

LETTER

RESPONSE

Letter BB

March 21, 2012

To: DSDEAS@San Diego.gov

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

BB-1

We would like to register our support for the Plaza de Panama Project. As frequent users of the park for the purpose of walking in a pleasant atmosphere and also as occasional visitors to the San Diego Museum of Art and the Mingei International Museum we would love to see the parking lot in front of the San Diego Museum of Art and the paved streets leading up to this area turned into a promenade. We believe this would enhance the experience of all park visitors, especially since the plan has provided for an alternate route for vehicles and actually increases parking AND park space. We think this is a brilliant plan and we applaud the creators for coming up with innovative ideas that solve so many issues without the usual less than desirable tradeoffs.

Sincerely,



Mark and Linda Pennington

2609 Tuberose Street

San Diego, CA 92105

gizmpennington@cox.net

BB-1 Comment noted.

LETTER

RESPONSE

Letter BC

From: [Donna Posin](#)
To: [DSD EAS](#)
Subject: reject the Sanders/Jacobs bypass road
Date: Sunday, February 26, 2012 10:17:42 PM

BC-1

Dear E. Shearer-Nguyen,
I have looked over the information regarding the proposed Sanders/Jacobs bypass road and parking lot. This plan will ruin the beauty of Balboa Park and destroy the historical qualities which make Balboa Park so unique. We don't need more cars and the noise and exhaust they bring into the center of the park. Please reject this plan.
Thank you,
Donna Posin

BC-1 Comment noted.

LETTER

RESPONSE

Letter BD

HC Jay Powell

March 20, 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 (Circulation and Parking Structure Project)
Draft Environmental Impact Statement**

Dear Ms. Shearer-Nguyen:

I have the following comments on the subject DEIR regarding the proposal advanced by the Plaza de Panama Committee and alternatives.

BD-1 The project scope and description. The project objectives, scope and description includes so many detailed elements, that any alternative that does not achieve each and every one of in the specific manner noted, will be unfairly penalized in the evaluation. In addition, some of the alternatives were rejected for reasons such as land form changes that could not be mitigated or because they were assessed to not be capable of completion by the Park Centennial celebration deadline in 2015. This unfairly eliminates those alternatives or portions of those alternatives that might be implemented in phases from evaluation.

BD-2 It appears that the primary objective of the project is to remove motor vehicles from the Plaza de Panama and as many other adjacent areas such as the Cabrillo Bridge, the Plaza de California, the road way that is referred to as "the Mall"(Esplanade) stretching around the Organ Pavilion and the Pan American Road East. If so, then the choices of alternatives could have been expanded to reflect different approaches and/or strategies.

BD-3 Quince Street Reconfiguration.

As an example, if the primary objective were to minimize impacts of motor vehicle, private automobile traffic and still retain motor vehicle access to the Central Mesa from the West, then a variant of conversion of the Quince Street bridge and access either under Cabrillo Bridge or behind the Zoo and Old Globe, Art Museum would be the superior least intrusive alternative.

This alternative could eliminate motor vehicle traffic from all areas north of the Organ Pavilion up to the rear of the Art Museum – that would include Cabrillo Bridge, Plaza de California and the most or all of the Mall with alternate access created for disable parking only from the area south of the Organ Pavilion to the Alcazar Gardens parking lot. The street could be reconfigured to go one of two or both routes into different areas of the park as described here:

BD-1 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 which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project.

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. As required by this CEQA section, Section 9.2 provides a discussion of the alternatives considered but rejected.

Ultimately, pursuant to CEQA Guidelines Sections 15091 and 15093, Findings and a Statement of Overriding Considerations, has been prepared for the consideration of the decision making body (City Council) and left to its discretion to determine whether to approve or deny the project or any of the alternatives, or combination thereof.

BD-2 Pursuant to CEQA Guidelines Section 15126.6(a) the EIR includes a reasonable range of alternative and need not address every conceivable alternative Alternatives were chosen for the EIR analysis based on their ability to avoid or lessen impacts of the project and meet most of the project objectives. Also, in accordance with CEQA Guidelines Section 15126.6(f), the range of alternatives provided in the EIR analysis is governed by the rule of reason that requires the EIR to only set forth alternatives necessary to permit a reasoned choice. See also response to comment BD-1.

BD-3 As discussed in Section 9.2.5, the Quince Street Access Alternative was considered but rejected due to the increase in physical impacts to several environmental issue areas (visual quality [landform alteration, neighborhood character]; biological resources; historical resources [archaeological and built environment]; hydrology; water quality; air quality; and greenhouse gas) as compared to the project, and because it would not reduce significant impacts of the project. Pursuant to CEQA Guidelines Section 15126.6(b), the EIR alternative analysis shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. As the suggested modifications to the Quince Street Access Alternative would not further avoid or reduce a significant project impact, it was considered but rejected.

LETTER

RESPONSE

Comments to Draft EIR, Plaza de Panama Project
March 20, 2012
Page 2 of 4

a) west and south of the zoo facility and up through the roadway areas around the Old Globe and behind the Art Museum , Arboretum thru to connect eventually with Park Blvd and adjacent parking lots.

b) west and south of the zoo facility and under the Laurel street/El Prado bridge and around and up the slope leading to or past Alcazar Gardens Parking area.

BD-4 Cabrillo Bridge Roadway Descending Approach (two alternatives)

The next least intrusive alternative would be to use the portion of the Cabrillo Bridge that includes actual bridge support but to then have the roadway descend as it approaches the Plaza de California area . A diagram and description of the diagram are attached and incorporated into and as a part of these comments for your consideration.

With the roadway to be at an estimated 20 or more feet below grade by a point approximately fifty (50) or more feet west of the approach to entrance to the Plaza de California area, the advantage of this “descending roadway” approach would be to provide actually two different potential automobile/motor vehicle pathways to avoid the auto impacts to the areas of prime concern – pedestrian connectivity and priority for the Plazas de California and Panama , El Prado and the Mall (Esplanade) and Pan American Roadway area. In addition, this alternative could add additional pedestrian plaza area over the depressed roadway at a point approximately fifty (50) feet or more west of the entrance to the Plaza de California and further eliminate crossing conflicts between pedestrians and autos to enhance safety and both pedestrian and auto traffic flow.

BD-5 (a) Enhanced Tunnel Alternative. Instead of the tunnel alternative that is described in the DEIR, the tunnel would begin at some 50 feet or more west of the west entrance to Plaza de California where a new pedestrian plaza would be created over the depressed roadway and the roadway would proceed underground to point appropriate under the Plaza de Panama then head south under the Mall (Esplanade) to a point chosen for surfacing similar to the project proposal.

This alternative could also incorporate underground ADA compliant parking and/or pedestrian drop off areas under the Plaza de Panama which could be accessed by ramps and/or elevators. Tunneling construction alternatives employed in construction of freeway covers in the Phoenix, Arizona area could minimize cost and disruption of this enhanced tunnel alternative. This method is well documented and essentially employs installing piers and pouring the covers and then removing earth under the already constructed covers.

BD-4 See response to comments BD-2 and BD-3. As this suggested alternative modification would not avoid or substantially lessen any significant effects of the project, it was considered but rejected.

BD-5 The concept proposed in this comment is a variation of the Tunnel Alternative, and its impacts would be similar to those associated with the alternative as addressed in Section 9.3.4Bi. This alternative variation also would result in significant, unmitigable impacts to land use (plan consistency); historical resources (built environment); and visual quality (architectural character) associated with physical impacts to the Cabrillo Bridge and Plaza de California. Other impacts, similar to the Tunnel Alternative, 4Bi, would include significant unmitigable noise (temporary construction), and mitigable impacts to land use (MSCP), biological resources (raptor, MSCP), historical resources (archaeological resources), and paleontological resources impacts. Additionally, this variation would not reduce any of the project's significant impacts.

Pursuant to CEQA Guidelines Section 15126.6(b), the EIR alternative analysis shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. As the suggested modifications to the Tunnel Alternative would not further avoid or reduce a significant project impact, it was considered but rejected.

LETTER

RESPONSE

Comments to Draft EIR, Plaza de Panama Project
March 20, 2012
Page 3 of 4

BD-6 b) Southern Roadway Diversion Alternative, (a depressed Centennial Bridge) . Instead of the proposed Centennial Bridge described in the DEIR, the Southern Roadway Diversion would begin at a point similar to the proposed bridge but be at an elevation at least 20 feet below the grade of the existing roadway and proposed bridge. The depressed area over the original roadway at a point fifty (50) feet or more west of the west entrance to the Plaza de California would be covered by additional pedestrian plaza area. The Southern Roadway Diversion could follow the same pathway as the proposed bridge or any alternative which would minimize the visual impacts and maximize the benefits of use of this pathway and potential reuse of the Alcazar Garden Parking lot. Such a configuration would provide for consideration of a multi-level and/or below grade parking structure to be located on the current Alcazar parking lot site with priority for ADA parking and pedestrian drop off points. The roadway could continue through the area similarly to the proposed project roadway and make connections to minimize or eliminate conflicts with pedestrian crossings.

BD-7 Expansion of Pedestrian Priority Areas.
The area currently occupied by parking for the Pan American Plaza area could be similarly transformed into a reclaimed plaza area and that parking eliminated or moved to one or more of the proposed parking areas in the proposed project and/or alternatives (ie, expanded structure south of Organ Pavilion, structure under the Plaza de Panama, structure on site of Alcazar Gardens parking lot). Such an expansion would truly return the Central area of the park to a significant open space dedicated to pedestrian uses and enjoyment and restore the original expansive plaza areas and connectivity by pedestrians for the central area.

BD-8 Phasing of Project Elements.
In order to provide opportunities to incorporate aspects of alternatives suggested here or by others, the elements of the project such as the parking facilities could be phased in after the imposed Centennial celebration deadline of 2015. For example the parking structure proposed for south of the Organ Pavilion could be phased in at a later date with interim use of other parking areas as necessary with shuttle connections.

BD-9 Other Observations and Considerations.
By the proposed project title description and elements, any alternative that does not include a parking structure project will be considered inadequate in this analysis.

BD-6 Comment noted. See response to comments BD-2 and BD-5. This modification to the Tunnel Alternative would not further reduce a significant project impact or meet additional project objectives and impacts would generally be similar to those disclosed in the EIR.

BD-7 Comment noted. Pedestrianizing the Pan American Plaza area is not an objective of the project and therefore not a component of what is being proposed by the applicant. The project, however, would not preclude any future proposal to reclaim Pan American Plaza.

BD-8 Comment noted. A phased project alternative has been addressed in Section 9.3.5.

BD-9 Pursuant to CEQA Guidelines Section 15126(6)(c), a project alternative may be considered if it meets most of the project objectives and is capable of avoiding or substantially lessening any significant effects of the project. See response to comment BD-1.

LETTER

RESPONSE

Comments to Draft EIR, Plaza de Panama Project
March 20, 2012
Page 4 of 4

BD-10

It should be made explicit that the proposed project continues the automobile dependence of visitors. It does not appear to encourage or incentivize the use of public transit or bicycling to and from the park or within the park. For example, if transit were to come into the central area of the park, stops could be located at the pedestrian drop off areas either in the alternative underground parking structures or those parking areas or structures proposed. Extensive bicycle parking areas could be created in the pedestrian plaza areas.

The large investment in parking structures and dependence on revenues from parking fees to finance those structures creates a continued dependence on the automobile and may in fact be a counter incentive to locate transit routes and stops within those areas for region residents and out of town visitors use. This appears to run counter to state legislative mandates to reduce green house gases. The DEIR needs to more fully address this aspect of the proposed project and alternatives.

Motor vehicle serving elements and alternate access to those facilities should be set forth clearly so that they can then be evaluated to achieve the best combination of alternatives for the beauty of the park and the best pedestrian and active transportation and transit experience.

Thank you for the opportunity to comment on this proposal and alternatives. Please contact me at (619) 813-8485 or hcjpowell@cox.net if you have any questions regarding this comment letter and the attachments.

Sincerely,



HC Jay Powell
3191 North Mountain View Drive
San Diego, California 92116
hcjpowell@cox.net
(619) 813-8485

Attachments :

1. Diagram showing eastern portion of Cabrillo Bridge in top view plot and southern elevation and depicting proposed descending roadway.
2. Description of diagram and proposal for roadway to descend from west to east.

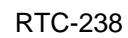
(Comments to Park DEIR March 20, 2012)

BD-10 See response to comments S-8 and S-9. The project would not preclude the use of public transit or bicycles.

Pursuant to California Public Resources Code (PRC) Section 21002.1, the purpose of the EIR is to identify significant impacts of the project. The project would not generate additional trips, but rather redistribute existing and future trips that would be a result of natural population growth. The project does not propose any new attractions that would be considered "trip generators." The dependence on automobiles is an existing condition and not a project impact.

Greenhouse gas impacts and consistency with greenhouse gas-related plans, policies and regulations are analyzed in Section 4.9.

RESPONSE



LETTER

RESPONSE

ATTACHMENT 2 to HC Jay Powell Comment: Description of Diagram of East Portion Cabrillo Bridge, Overhead Plot and South Elevation

The key assumption is that as you enter from the West, heading East over the bridge, as you cross the actual portion of the bridge that is anchored at the base of the East slope above 163 (ie, where the bridge arches stop) , there is a portion of the roadway from that point to the outside southeastern most building of those buildings which surround the Plaza de California which is of approximately 280 feet in length supported by concrete walls built on top of the increasing slope of the hill which forms a portion of the Central Mesa. It is assumed that this portion under the actual roadway (not necessarily under the sidewalks) is either fill or hollow with some potential additional structures to support the roadway.

The proposal depicted in the Diagram attached is to begin a descent at a point approximately 280 feet west of the Southwestern building at a slope and rate which results in reaching a depth of approximately 20 feet at a point approximately 50 feet from the outside of the southwestern most building.

It should be noted that this portion of the Roadway and sidewalk appears to actually ascend some several feet from West to East which is not depicted in the diagram (diagram assumes level roadway west to east). Therefore, the estimated 20 foot depth of the roadway from the existing roadway elevation would actually be greater by that amount. This descent could be started at a later (closer, more easterly) point if a steeper slope was acceptable or desired due to other constraints.

The depressed roadway could proceed forward as a tunnel under Plaza de California and Plaza de Panama and further if desired or make a right turn (to the South) at approximately the same point planned for the Centennial Bridge and then continue on a path approximating the new proposed route created for the Centennial Bridge at a much lower height that would be of a much reduced visual impact.

HC Jay Powell, hcjpowell@cox.net, (619) 813-8485

LETTER

RESPONSE

Letter BE

From: [Elaine Regan](#)
To: [DSD EAS](#)
Subject: Plaza de Panama
Date: Thursday, March 22, 2012 7:00:49 PM

BE-1

I'd like to put in my vote for the Jacobs' Plaza de Panama plan. I think the all aspects of the plan (Centennial Bridge, modifications to the Alcatraz parking lot, road travelled by vehicles to get to the new parking garage, new park space that will be created, new pedestrian ways, etc.) are brilliant!

Elaine Regan
San Diego, CA

BE-1 Comment noted.

LETTER

RESPONSE

Letter BF

From: [Scott Sandel](#)
To: [DSD EAS](#)
Subject: Plaza de Panama project draft EIR comments
Date: Sunday, February 19, 2012 10:55:00 AM

To: E. Shearer-Nguyen, Environmental Planner
 City of San Diego Development Services Center

Subject: Plaza de Panama project draft EIR

From: Scott L. Sandel, ASLA
 2260 Fort Stockton Drive
 San Diego, CA 92103

I would like to provide my key objections to the Jacobs plan, particularly the Bypass Bridge, as follows:

- BF-1
- I strongly object to the Bypass Bridge [aka Centennial Bridge]. This is a bad idea, aesthetically and as a matter of poor design and environmental planning. As a landscape architect, I am aware of the grading and other adverse impacts that the bridge and the Palm Canyon route of circulation will bring. But of utmost concern is the unmitigatable affects it will have on the historic bridge.
- BF-2
- I am very much in support of the public process that brought about the Precise Plan solution that was vetted through a long and public process that was not tainted by moneyed private interest.
- BF-3
- I am in favor of the Precise Plan alternative, with the option of closing the bridge to vehicular traffic for periods that would allow pedestrian and bicycle use.
- BF-4
- I am in favor of a parking structure, but am against the site planning in the Jacobs design – especially the re-grading and lowering of Pan American Road East and the new road through Palm Canyon. *Instead*, I would support a new parking structure on the East Mesa landfill that could be served by a signature aerial tram that could bring park visitors to the Prado.
- BF-5
- A major concern that I have is the close and non-transparent relationship that Mr. Jacobs has with top levels of our city government. I have been to public meetings that have been structured so as to minimize public opposition and to favor Mr. Jacobs' vision over other alternatives.

Respectfully,

Scott L. Sandel,
 CA Licensed Landscape Architect #3026

- BF-1 Comment noted. The project's significant and unmitigable impacts are disclosed in Section 5.0.
- BF-2 Comment noted.
- BF-3 Comment noted.
- BF-4 Comment noted.
- BF5 Comment noted.

LETTER

RESPONSE

Letter BG

From: [Keating House Inn San Diego](#)
To: [DSD_EAS](#)
Subject: Comments on Plaza de Panama project
Date: Friday, January 27, 2012 1:44:54 PM

- BG-1** I forgot to add the following comments to the EIR comments I sent earlier to-day (copy below).
- Village Place should be reconfigured to provide ADA compliant parking. It is already on the same level with El Prado.
- Earlier comments:
- Comments concerning Draft EIR for the Plaza de Panama renovation project:
- BG-2** Like so many other San Diegans, I want to see cars removed from the Plazas de California and Panama, the Palisades, the Alcazar Gardens parking area, and Pan America Plaza. Unfortunately, the Draft EIR has missed the mark on several fronts including sustainability and preservation of the historic integrity of the Balboa Park landscape, so I propose the hybrid plan detailed below:
- The Cabrillo Bridge should be closed to all traffic except emergency vehicles, bicycles, pedestrians and the cross Park tram.
- BG-3** All Balboa Park websites, City of San Diego websites, advertising and signage along Sixth Avenue and Highways 5 and 163 should be changed to direct automobile traffic to the Park Boulevard entrance to Balboa Park (I understand that currently, without any such prompting, approximately 2/3 of all automobiles enter the park via this route.)
- BG-4** The San Diego Trolley should be extended the short distance up Park Boulevard from the Centre City station at City College to the old Zoo station. (Our ancestors knew how to design a sustainable city!)
- BG-5** An automobile parking structure combined with a San Diego Trolley stop and a Balboa Park tram stop can be built at Inspiration Point. If possible, the top of the garage could be landscaped to provide areas for passive and active uses. The view to the Pacific Ocean from this vantage point will be spectacular especially if money can later be found to cover the section of Highway 5 that fronts Inspiration Point. (The current Centre City plan lists as a goal the idea of covering sections of Highway 5 where it passes through the downtown area.)
- BG-6** A state of the art, luxury, environmentally advanced tram system should be implemented that has, as one of its routes, the route between the new Inspiration Point garage and the west end of the Cabrillo Bridge. The trams should be low floor and luxurious to appeal to everyone from backpacking day trippers to diamond bedecked patrons of the arts. (I do not say this in jest. I am serious. The trams must be the best quality, have short headways, and must be immaculately maintained to attract all segments of society.) There can be special event tram service for the Old Globe Theatres and Museum events.
- BG-7** By making the improvements listed above, we can connect Balboa Park to the extensive bus and rail system and the associated park and ride lots that cover the County of San Diego. We will also achieve both the goal of the Jacob's Plan to remove the cars completely from the central plazas of Balboa Park, and the goal of Save Our Heritage Organization and many other groups to respect the historic fabric and plan of Balboa Park.
- If we institute this plan, I believe that Balboa park will again be magnificent.
- Douglas Scott
 1929 Fourth Avenue B
 San Diego, California 92101
 619.238.4278

BG-1 Comment noted. This second letter provided, including the copy of the first letter, is assumed to replace the first letter submitted.

The project would provide adequate ADA compliant parking in the Alcazar parking lot and the parking structure. The project does not include changes to Village Place.

BG-2 Comment noted. The closure of Cabrillo Bridge to public vehicular traffic is addressed in several project alternatives that are discussed in Section 9.3.3, Cabrillo Bridge Pedestrianized Alternatives.

BG-3 Comment noted.

BG-4 Extension of the San Diego Trolley is beyond the scope of the project. Future extension would not be precluded by the project.

BG-5 Pursuant to CEQA Guidelines Section 15126.6(c) the EIR includes a reasonable range of alternatives, each of which could feasibly attain most of the basic objectives of the project and avoid or substantially lessen at least one of the significant project effects. However, pursuant to CEQA Guidelines Section 15126.6(f) an EIR need not address every conceivable alternative. The concept proposed in this comment does not require inclusion in the EIR alternative analysis as is a variation of the Inspiration Point Parking Structure Alternative (3D) described in Section 9.3.3D. Similar to Alternative 3D, this alternative would result in significant and unmitigable impacts to public safety through potential ALUC and AEOZ inconsistencies and potential impacts to public view corridors.

BG-6 Comment noted. The Inspiration Point Parking Structure Alternative described in Section 9.3.3D includes a tram from the parking structure to the Mall/Plaza de Panama.

BG-7 Comment noted.

LETTER

RESPONSE

Letter BH

From: [Seael, Larry](#)
 To: [DSD EAS](#)
 Subject: Alcazar Parking Lot
 Date: Saturday, February 11, 2012 4:11:41 PM

BH-1

It appears that almost all the plans include a reconfiguration of the Alcazar parking lot to ADA exclusively. This is a short-sighted idea. Do you realize there is the most valuable and least known of all resources for Archers at the end of this lot? So, I am to understand the non-ADA Archers would not have continued convenient parking next to their venue under the new plans? They would have to lug their cargo to this end via a parking structure at the other side of the Organ Pavilion. Right now, we have both ADA and non-ADA access in Alcazar lot and this mixture is a good thing. Don't lump all ADA into one spot. It's not good for ADA people nor in the interests of the Archers I'm sure. Also, don't get rid of the little restroom at the back end of this Alcazar lot either. That would be a mistake.

BH-2

Here's something else to consider as you carry through with City planning especially when it comes to using monies donated by rich benefactors (i.e., Central Library, Balboa Park Reconfiguration) to ram projects like these through the public planning process. I work for a City Department. We have an extraordinarily lean, you might even say unreasonably lean budget for maintaining existing buildings and facilities. These buildings/facilities occasionally get rebuilt or upgraded. For the most part, they receive a minimum of attention in the form of emergency repairs while the majority of facilities continue unnecessarily on a downward slide increasing deferred maintenance until the facility basically becomes unusable, condemned or turns to dust.

BH-3

If I were a City Counsel member, my response to the rich benefactor wanting to give money to the City would be the following: Thank you for your generous offer/donation. They are appreciated and desperately needed. However, we on the City Counsel are obligated to not only represent the rich and empowered and while we will gladly accept your donations, we do so with the understanding that the money should be used for the greater good and not just because one person wants to re-configure balboa park in their own design or to build a new library and get their name on plaque. The counsel members should instead take care of the facilities now in existence to the level they should be to stave off continued downward spiral of deferred depreciation. This is where the donated money should go. Then, as deferred maintenance is caught up on then, and only then, should projects like re-building city halls and reconfiguration of regional park facilities, and new libraries be considered in my opinion.

BH-1

The project includes a drop-off area in the Alcazar parking lot. It should be noted that loading areas are provided in the Alcazar parking lot to accommodate unloading of equipment. The ADA use of the Alcazar parking lot is consistent with the policies of the Central Mesa Precise Plan (CMPP). As stated in Section 3.4.4, a small single fixture restroom would be provided at the Alcazar parking lot.

BH-2

Comment noted.

BH-3

Comment noted.

LETTER

RESPONSE

Letter BI

From: Jay Shumaker
To: DSD EAS
Subject: Fwd: EIR COMMENTS: BALBOA PARK PLAZA DE PANAMA, Project No. 233958/SCH No. 2011031074
Date: Thursday, March 22, 2012 11:26:55 PM

Please use this version, not the one sent earlier, because I've corrected a couple of sentences for clarity.

Thank you.

-JS

Begin forwarded message:

From: Jay Shumaker <jsaia@me.com>
Date: March 22, 2012 5:58:11 PM PDT
To: DSEAS@sanidiego.gov
Cc: Jay Shumaker <jsaia@me.com>
Subject: EIR COMMENTS: BALBOA PARK PLAZA DE PANAMA, Project No. 233958/SCH No. 2011031074

From the EIR:

BI-1

"Alternative 4iv, Restores Alcazar Lawn area, provides "equivalent" ADA parking and tram. Mall would become pedestrian on El Cid Island, while allowing slow traffic around the island, and pedestrian crossings across one-way, one-lane, traffic with clear visibility."

"...it [Alt iv] would not remove vehicles from the El Prado or the Plaza de California; therefore, it would not entirely meet the vision of the BPMP - the elimination of pedestrian/vehicular conflicts in the El Prado and Palisades areas," from EIR.

The latter statement is inaccurate. The Balboa Park Master Plan would not necessarily eliminate pedestrian/vehicular conflicts but rather would adopt them as traffic calming measures which slow the cars, thus discouraging through-park commutes and thus maintaining a high level of safety while respecting the original concept of the entry of vehicles across the Cabrillo Bridge and through the Prado. The Project would restore the original Prado landscape, but not the original intention of the passage of

BI-1 The following are two excerpts from the BPMP:

It is intended that Balboa Park become more pedestrian oriented. Conflicts between automobiles and pedestrians should be minimized. Accordingly, one will be able to walk from the Zoo to the Aerospace Historical Center without crossing a street. In addition, a large trail system is proposed throughout the Park tying into the central core of the Park.

The Prado and Palisades plazas shall be restored as pedestrian oriented plazas in which through vehicular traffic is minimized and conflicts with pedestrians are reduced.

Thus, it is the intent of the BPMP to minimize pedestrian/vehicular conflicts by eliminating as many conflict locations as possible, as indicated by the BPMP phrase "without crossing a street". The BPMP does not identify the conflicts as traffic calming measures, a method to slowing vehicle traffic, or a way to minimize through-park traffic.

The Half-Plaza Alternative would not achieve the project objective or the BPMP vision of eliminating the pedestrian/vehicular conflicts in the El Prado and Palisades areas. The Section 9.3.4Biv states that "the Half-Plaza Alternative would improve pedestrian circulation and safety and would not result in significantly adverse pedestrian circulation impacts" and goes on to state that "the Half-Plaza Alternative would provide fewer benefits, because it would remove 10 of the 20 existing pedestrian/vehicular conflict areas as compared to 14 for the project." This alternative would result in fewer conflict reductions due to the increased activity of the valet and tram drop-off/pick-up locations for this Alternative, including the number of pedestrians crossing along the along the Esplanade south of El Prado.

LETTER

RESPONSE

	<p>vehicles.</p>		
BI-2	<p>"The Half-Plaza Alternative would retain a degraded historic/visual condition in the Plaza de California, El Prado, the Mall, and part of the Plaza de Panama, but would eliminate vehicles from a portion of the Plaza de Panama and restore the historic/visual fabric to that area," from EIR.</p> <p>No, the Goodhue entry was designed to accommodate vehicles. Thus, a "degraded" condition would be the Project's bollards, "right turn only" signage, forbidden vehicular entry and a California Plaza and Prado devoid of vehicles, and of the historic entry drama.</p>	BI-2	<p>As indicated in Section 4.3.2.1(c), the removal of vehicles would be considered a positive aesthetic or change to the existing visual character of these areas. While the project would include signage and bollards, the project would also remove numerous existing traffic-related signs. Overall, the project visual impact related to signage and bollards would be less than significant.</p>
BI-3	<p>Regarding the comment that Alt 4iv provides fewer benefits than the Project:</p> <p>The EIR traffic analysis applies to "city traffic" in general but must not be applied to traffic in the park, which is made slower and prettier by design and which must obey a higher standard of safety.</p>	B-3	<p>Comment noted. The EIR traffic analysis was prepared according to City standards, adhering to both the City of San Diego Traffic Impact Study Manual (1998) and the City's CEQA Significance Determination Thresholds (2011).</p>
BI-4	<p>Park traffic must be governed by park rules, else the park itself become more city-like under the city traffic rules applied by the EIR. The principle is called "creeping baseline," as, over time, the park setting can be degraded by generations who relax their park priorities and allow city-like, or commercial uses, to encroach into their park.</p>	BI-4	<p>Comment noted. Development, operation and maintenance of the project site are governed by the BPMP and the CMPP; the EIR is not a policy or regulatory document. Any proposal for future development within the Park that is incompatible or inconsistent with the Master Plan or Precise Plan would be subject to future discretionary review and approvals by decision-making bodies.</p>
BI-5	<p>"It is OK for a city to be more like a park, but not OK for a park to be more like a city," Jay Shumaker.</p> <p>Park priorities must prevail over any plan for efficient traffic flow that would serve, thus encourage, smoother cross-park commutes by eliminating traffic calming crosswalks and narrower, prettier, streets. Conventional concepts of city traffic that would reduce or eliminate vehicular pedestrian conflicts and other traffic calming always result in faster speeds.</p>		<p>Future traffic within the Park will occur naturally as a result of population growth.</p>
		BI-5	<p>Comment noted. Existing speed limits in the Park are 15 mph, which would be consistent with the proposed speed limit for the Centennial Bridge and Centennial Road.</p>

LETTER

RESPONSE

<p>Always!</p> <p>BI-6 In fact, in this specific situation on the Central Mesa such traffic calming devices as crosswalks, stop signs, queuing and linear views of distant pedestrians act to slow the touring automobile and no serious accidents have been reported here. This is exactly how the plan for El Cid Island and the "Half Plaza" work, providing more benefit with less obligatory speed regulation and enforcement at much less cost, while displacing busy commuters. Thus the Half Plaza plan offers more benefits than the Project. Traffic safety and park beauty are accomplished at much less Historical, Land Use, Public Views, and Noise, impact than the Project's expensive new bridge and roadway, ...which together allow a creeping baseline of city-like construction and which accrue public construction expense and maintenance costs.</p> <p>BI-7 The Alcazar parking lot is linked to commercial theater activity which was not originally planned, and the trend to feed such activity with free parking should be reversed, ...not enhanced. The 1989 Master Plan, the Half Plaza plan and the Project would reduce surface asphalt and the resulting heat gain and would replace some surface parking with a parking garage. But the Half Plaza plan would eliminate all three central parking lots while supporting the garage concept, thus the Half Plaza plan is a substantially better benefit to the park, per the Master Plan, than the meager advantage of clearing only the Plaza de Panama of cars.</p> <p>BI-8 When Laurel Street extended into the park all the way to Park Boulevard traffic became untenable, dirty and unsafe. The new roadway to Park Boulevard promises a significant savings in the cross-park commute times, which will lead to exactly the untenable traffic through the park as before, ...a heavy price to pay for clearing the Plaza de Panama. The EIR recognizes traffic congestion all around Balboa Park but claims that the Project's new roadway improves city traffic by reducing congestion outside the park. This a perversion of priorities that otherwise would lead to a pacific city over time. The EIR is</p>	<p>BI-6 The Half-Plaza Alternative introduces valet/tram operations just south of El Prado on both the east and west sides of the Esplanade. The combination of valet/tram operations, and existing high number of conflicting pedestrians/vehicle circulation all in a concentrated area would result in significant queuing at that location as discussed in Section 9.3.4Biv (See also page 375 and Table 192 of the Traffic Impact Study [Appendix D-1]).</p> <p>A Parking Structure Financial Projections Report has been added to the EIR as Appendix D-3. As indicated in this report, proposed parking fees would be collected to fund on-going maintenance and operation costs associated with the parking structure and trams.</p> <p>BI-7 Comment noted.</p> <p>BI-8 Comment noted. Cross-park travel is addressed in Section 4.4.3.1(c). Cross-park travel time is estimated to be 2 minutes, 50 seconds for the project as compared to 2 minutes, 13 seconds for existing conditions. Travel distance is estimated to be 0.45 mile for the project as compared to 0.50 mile for existing conditions. The project would shorten the travel distance by approximately 0.05 mile, would reduce pedestrian crossings, and alter traffic controls (e.g., stop signs). As indicated in the EIR, this change in cross-park traffic commute times would not be substantial.</p> <p>The EIR does not claim that the project would reduce congestion outside the Park. On the contrary, as discussed in Section 4.4.2 the project would have no effect to external Park traffic.</p> <p>See response to comments BI-3 and BI-4.</p>
---	--

LETTER

RESPONSE

<p>simply wrong to apply such engineering concepts to our park. Traffic forecasts based upon current growth trends do not apply to a new roadway which has little or no traffic calming and which would save the busy commuter a trip all around the park through a congested city.</p> <p>BI-9 The Half Plaza plan protects or restores over 11.3 acres of park land compared to the "restored" 6.3 acres claimed by the Project, ...another benefit of Alternative 4iv over the Project. But the Project's restoration of the Plaza de Panama is an inaccurate interpretation of the original park design, thus is not a restoration at all.</p> <p>BI-10 The Half Plaza plan would elevate the car-free plaza at least a curb height over the roadway and proposes to relocate the handicap ramp at the Timken for a broader invitation to the lawns beyond the Timken's entry, resulting in the sensation of a garden setting for the Timken, and for the possibility of a more handsome and distinct forecourt to that art museum. The Project, on the other hand, would create an enormous but isolated plaza with broad, shallow, ponds of water, with drippings sure to be tracked into the museums, and sure to waste water to evaporation until they are eventually drained, then abandoned. This represents an unnecessary environmental and economic cost avoided by Alt. 4iv.</p> <p>BI-11 The EIR makes no mention of the distasteful circus of miscellaneous and random performers on the East Prado, each with a donation cup out front, rather like our own version of Venice Beach in Los Angeles. Thus the EIR supports the Project without acknowledging the specific context of that formal part of our park. Serious art museums and world class theater have established the context of the Plaza de Panama. To be truly successful any plan must refine that specific context, but the EIR makes no mention of that and accepts the Project's theme of yet more cheap entertainment there. Fittingly, the Half Plaza plan would offer shade trees, outdoor dining, public art and quieter amenities conducive to good conversation for that zone of the park.</p>	<p>BI-9 Comment noted. The proposed design of Plaza de Panama is intended as a rehabilitation rather than a restoration. In compliance with CEQA, the analysis in the EIR uses the existing conditions as the baseline.</p> <p>BI-10 Comment noted.</p> <p>BI-11 Comment noted.</p>
---	---

LETTER

RESPONSE

<p>BI-12 Meanwhile the Project ignores the Palisades area which is surrounded by more populist, festive, activities: museums, the Starlight Bowl, athletic facilities, International Houses, and public meeting and dancing facilities, ...all establishing a very festive mood and context in an alternative location, ...except for all the asphalt and parked cars. Alt iv would restore the Palisades per the 1989 Master Plan, at minimal cost, a further benefit beyond that offered by the Project.</p> <p>BI-13 The chapel at the Museum of Man hosts several weddings and ceremonies every year. The EIR does not recognize the disruption to worshipful chapel activities caused by traffic immediately outside the high chapel windows, ...noise, fumes, and the shadows of a projected 12,000 cars a day, a conservative car count given the new shortcut for commuters.</p> <p>BI-14 The EIR supports the Project's estimate of much higher traffic loads, based upon current trends. In fact, slow traffic across the bridge and into the park will limit if not eliminate commutes through the park leading to much slower growth in traffic load. As touring the park is made more beautiful, and even slower, all commuters will eventually seek more predictable and quicker routes around Balboa Park, just as it did when through traffic to Park Boulevard was removed from the East Prado. Balboa Park need not, should not, be thought of as a relief for city traffic and failed city intersections.</p> <p>BI-15 The "significant" impact to Historical Resources of El Cid Island as judged in the EIR should be "less than significant" because surface improvements needn't be considered permanent but rather more like landscaping, and because the original buildings on the Promenade do not exist, therefore the history of them is not compromised. El Cid Island is merely a prettier auto tour than the other alternatives.</p> <p>BI-16 The EIR makes no mention of the East Mesa, whose views would be destroyed by the level fill proposed by the Project, covering the entire Arizona Landfill, the last area of open,</p>	<p>BI-12 The reclamation of the Palisades is beyond the scope of the proposed project. Comment noted.</p> <p>BI-13 See response to comments AW-2 and BI-8. The presence of vehicles near the Museum of Man is an existing condition. The proposed rerouting of traffic would move vehicles further from the Museum of Man. More specifically, and similar to the Alcazar Garden, the traffic noise source would be moved from the north side of the chapel to the south as a result of the project. The project would not increase traffic adjacent to the chapel; thus noise, fumes, and other traffic-related impacts would not worsen as a result of the project. The EIR adequately addresses noise, air quality and visual impacts of the project. See Sections 4.3 (Visual Effects and Neighborhood Character), 4.4 (Transportation/Circulation and Parking), and 4.5 (Air Quality) for more information.</p> <p>BI-14 Comment noted.</p> <p>BI-15 The historical resource analysis evaluates impacts of the project based on its consistency with the SOI Standards for Rehabilitation. The proposed El Cid Island, represents a significant change in the existing visual spatial relationships and configuration of the Mall and Plaza de Panama. This alternative would reduce Plaza de Panama to half of its historic size and introduce several new layers of trees and landscaping that would screen views of the two most historic buildings on the Plaza. The EIR determined these improvements would have a significant adverse impact, because they would be inconsistent with SOI Rehabilitation Standards 2 and 9.</p> <p>BI-16 The proposed fill would level the Arizona Landfill, which currently slopes from north to south. The site would still slope from north to south; however, the area would be more level, allowing for future passive parkland uses, consistent with the East Mesa Precise Plan for this area. There would be no mounding of soil that would result in downtown view blockage. View impacts related to disposal of soil export at the Arizona Street Landfill is addressed in Section 4.3 and determined to be less than significant.</p>
---	--

LETTER

RESPONSE

pastoral, promise in Balboa Park. The loss of such a space must be considered in social terms as well as in the terms mentioned in the EIR as an expedient dumping grounds for excavated soils.

BI-17

This brings up the core fallacy of most Environmental Impact Reporting, that abstract social needs can be subsumed by quantifiable categories of a given project while the environment eventually would suffer even more degradation by an unbalanced society made dysfunctional by the lack planning artistry not to mention open park space. Los Angeles comes to mind. This subtle point is neither acknowledged nor solved by Environmental Impact Reporting and so baseline priorities of our parks, and then of our cities, continues its degraded creep.

-Jay Shumaker

BI-17 Pursuant to CEQA Guidelines Sections 15064(e) and 15131, the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. A recreation discussion has been added to the Final EIR as Section 8.6 and, as identified in that section, park and open space impacts of the project would be less than significant.

LETTER

RESPONSE

Letter BJ

From: poolfood@aol.com
To: [DSD EAS](#)
Subject: Balboa Park Plaza de Panama - Proj. # 233958/Sch. No. 2011031074
Date: Sunday, February 05, 2012 4:32:14 PM

BJ-1

I am writing to express my preference for Alternate 3D – Inspiration Point parking structure – for the Subj. project. Based upon more than 25 years of experience visiting Balboa Park, I don't believe that it is necessary to continue allowing vehicle traffic to cross the Cabrillo Bridge, except for **emergency vehicles**. Additionally the cost and construction issues make the proposed Centennial Bridge unacceptable. The construction of a parking structure at Inspiration Point will more than compensate for the loss of parking at the Plaza and it will allow those who wish to use the Park to drive and then use the entrance off President's Way. Let's keep in mind that the majority of people, with the exception of handicapped individuals who are being accommodated by the revised parking at Alcazar Garden, **walk** around the park. We don't need to have vehicles on the Plaza.

BJ-2

Thank you for considering my comments.

John Silcox
San Diego

BJ-1 Comment noted.

BJ-2 Comment noted.

LETTER

RESPONSE

Letter BK

From: Mike Singleton
To: DSO EAS
Subject: Balboa Park Plaza de Panama EIR Project # 2333958/5CH No. 2011031074
Date: Tuesday, March 20, 2012 10:39:55 PM

Elizabeth,
 I have a number of questions relating to the traffic and visual impact analysis for the above referenced project.

BK-1

1) Though the modeling and the alternative analysis is very complete, the basic assumptions associated with traffic patterns and expected future conditions are not very clear. The conclusions have been based on these assumptions and I would like to understand more about what was assumed. Specifically:

1a. The report states that the proposed project is not expected to increase traffic from its current travel volumes across the bridge or into the park in general. This is not logical. The project shortens the distance for the traveler that enters from the west. It removes the pedestrian conflicts at several locations. It results in a significant number of additional parking spaces. For those interested in valet parking, it allows the most direct route from the west. It also increases the number of ADA spaces in the Alcazar Garden, again with the shortest entry coming from the west. The new roadway widths of the Centennial Bridge are wider than the current route. The roadbed is grade separated from most of the conflict points. The primary benefits of the project (increased parking, decreased pedestrian / vehicle conflicts, increased valet parking, increased ADA parking, and the centering of a major parking structure in the heart of the park for convenience to the museums) are somehow ignored in the traffic projections. This results in a project with no significant impacts (except one from the east of course), which is then used as a basis to compare against all of the other alternatives that somehow are found to have significant and unmitigable impacts and/or worse impacts than the applicants project. I would expect a minimum of a 10-20% increase of traffic coming across the bridge as a result of all of the project improvements. This increase in traffic will have a significant impact on the safety of pedestrians at the new right turn location to the bridge and will have impacts to cyclists along the entire entry road / bridge crossing leading up to the new bridge. Can you provide more rationale to substantiate the claim that no new traffic will be generated as a result of the proposed project?

BK-1

The project does not include any trip generating components. Centennial Road is intended to ensure that closure of Plaza de Panama to vehicular traffic would not result in increased congestion in areas external to the Park.

The project is not expected to bring additional visitors to the park since parking spaces (including ADA) and valet service are not trip generators (such as a museum or theatre, etc.). Thus, the proposed parking increase and valet improvements would not generate additional traffic.

The travel distance from the west to the first entry of the parking structure would be approximately the same travel distance (1,800 feet) to the existing Organ Pavilion parking lot with existing conditions; thus, not a reason for an increase of vehicular traffic.

While the project would eliminate several pedestrian/vehicular conflicts, the speed of vehicles traveling through the Park would continue to be limited to 15 mph. Traffic flow through the Park is anticipated to be similar under the existing and the existing plus project conditions. The project itself would not be expected to generate additional trips. In the future, additional vehicular trips attributed to population growth, would add additional traffic on the Cabrillo Bridge.

Pedestrian/bicyclist movements at the Centennial Bridge intersection would be controlled by an all-way stop sign with designated crosswalks, so this intersection would not result in a traffic safety hazard impact.

See Section 4.4 and the TIA (Appendix D-1) for more information.

LETTER

RESPONSE

<p>BK-2 1b. In a similar vain, the project alternatives that do not require the full closure of the bridge, are portrayed as having existing and future impacts resulting from future projections of population and park use. If an alternative was handled appropriately with a 22' wide travel lane, adjacent plaza walkways along the north and south sides of West Prado, was paved with loose fitting interlocking pavers, provided stop signs at several major pedestrian crossings, but kept the current route to the proposed parking structure, I will assure you that this option would result in a reduction of persons coming from the west. Especially if this was done in conjunction with managed closures on a weekly basis of the Cabrillo bridge held open for just pedestrians and bikes. Drivers would understand that this route is not the fastest and would use the other access points to the park as the path of least resistance. I would expect a 10-20% reduction of vehicular travel as a result of the items listed above. However, the EIR discounts all alternatives and indicates that they will have a significant impact on congestion and public safety. Can you explain with a listing of assumptions that repudiate the items listed above?</p> <p>BK-3 1c. The closed bridge alternatives as well as some of the managed and pedestrianized alternatives are tagged with creating a significant and unmitigatable impact to traffic flows on various portions of 6th Avenue, Robinson, University, A street, Florida Canyon, Zoo Drive and Park Boulevard. Though I agree that some diversion of traffic will reroute to these streets, the analysis treats drivers approaching the now closed route as if a temporary sign was placed there. If only 18% of the park users are considered to be local residents, it would follow that the majority of the traffic coming to the park is on one of the freeway systems. They would not continue to get off on Laurel Street or 5th or 6th Avenue / Elm Street (southbound drivers mostly, except northbound I-5 drivers that use 6th Avenue). They would utilize Park Boulevard or Pershing to access the park. Yet, the model indicates that these people will realize they can not get through and will then take a right or left on 6th and go northbound to all of Hillcrest's pinch points that are already congested, or they will take a right and go downtown and wiggle their way onto Park or Pershing. This is not logical. I am sure that the numbers in the model assume some traffic that would stay on the freeways, but it is not clear in the document and is critical to understand since all of the impacts make the alternatives look bad. Please provide background on these assumptions.</p> <p>BK-4 1d. Given the question of increased traffic resulting from the project as indicated in 1a, and given the concerns of diverted traffic listed in 1c, can</p>	<p>BK-2 All project alternatives were modeled based on the EIR description in Section 9.0. The closed bridge alternatives make no mention of travel lane widths, type of pavement treatments or additional stop controls at pedestrian crossings.</p> <p>Reduction in traffic entering the Park from the west is not an objective of the project.</p> <p>BK-3 The trip distributions for the project and all the alternatives were based on SANDAG Series 11 forecast models. For the closed bridge alternatives, the forecast modeled more trips on the freeways than existing conditions, as well as rerouting on the local surrounding streets. Of the closed bridge alternatives, the West Mesa Parking structure alternative assumes approximately 2 percent of trips approach from Laurel Street that turns right or left on to Sixth Avenue due to the location of the parking structure just east of Balboa Drive. See trip distribution exhibits in the TIA (Appendix D-1) for these alternatives (Exhibits 32, 40, 48, and 56)</p> <p>BK-4 See response to comment BK-3.</p>
--	---

LETTER

RESPONSE

it be assumed that the project was not required to utilize the regional model provided by SANDAG? This model, from my understanding, does a better job at determining the diversion routes and the affects on roadways some distance away from the project, unlike this project that only looks at the fringe. This close in look limits the ability to count on the diversion of traffic before it gets into the immediate area. Can you expand on this discussion.

BK-5 1e. A basic fault with most traffic modeling is that they predict the worst case (usually focussed on peak times) and they do not take into account any other mode shift or behavior shift that is likely to occur when persons find a particular route congested or inconvenient. With closure of the bridge, managed interval closing of the bridge, or several of the other alternatives that keep some vehicles on the bridge but that do not make them the priority, are likely to result in more people walking to the park, riding bikes to the park, taking transit, or at least carpooling or shifting their access time to off-peak times. Congestion levels also keep people from cutting through the park. The minute you remove some of the congestion, it becomes congested again because some will find this route to be the best, until it becomes congested again. This phenomenon is referred to as "induced demand" where new removals of bottle necks result in temporary congestion relief, only to be filled back up by those then deciding on using this un-congested route. The modeling does not take into account any of these behavior patterns. Increased transit service, a complete shuttle system that includes the west side of the park, improved bike access and facilities, integration of electric street cars on Park and 6th, as well as public education, would all result in a Traffic Demand Management mitigation measure that would reduce the impacts to below a level of significance. Yet the modeling nor the mitigation section indicates that anything can be done to reduce the demand on the west side of the park. Please explain why the model does not take these changes into account and why these TDM measures are not considered to reduce congestion or be suggested as mitigations.

BK-6 1f. The west side can handle several hundred more parking space simply by eliminating one lane of travel on the one-way Balboa Drive and restriping with angled parking. This, along with options for 6th Avenue and Quince and Juniper Streets could result in a similar yield as to what the proposed project is yielding, for less than the cost of a dozen spaces in the parking structure. Providing the parking on the periphery of the park along with improved walking, biking and transit options, are all valid

BK-5 Comment noted. For the SANDAG forecast models used in the analyses, the stages of transportation modeling process account for some mode choices, typically based on travel times. For bridge closure alternatives, the number of Park patrons entering from the west and then deciding to park and walk to the Park were estimated based on walking distances and review of traffic volumes currently coming to/from the west. It is acknowledged that Transportation Demand Management (TDM) could be used to mitigate impacts of project alternatives in some cases, but their feasibility would have to be evaluated. Since the use of TDM measures at the Park are speculative at this time, the TIA does not include such an evaluation.

BK-6 The restriping of Balboa Drive to diagonal parking would yield approximately 100 spaces for the stretch of roadway north and south of Laurel Street and is feasible. Additional parking along Sixth Avenue is not possible without reducing Sixth Avenue to one lane in each direction with diagonal parking. The existing and projected volume of traffic along Sixth Avenue would likely not allow for the reduction to one northbound lane without significant traffic impact.

LETTER

RESPONSE

mitigations and proper transportation planning options. Though one alternative does discuss this option, it does not seem to be factored into the modeling. The increased parking reserves would indicate that a person that might have to go way around park because of the bridge closure, might choose to just park there and either take a shuttle or walk to the museums. Please indicate why increase parking reserves do not have any affect on the diversion of traffic because of road closures. The Bankers Hill and Park West community is very concerned about the possible impacts to neighborhood parking if the bridge were to be closed. Some of this concern can be reduced if increased parking reservers existed. These residents have assumed that more parking would occur in their neighborhood, but the model assumes that all of this traffic would go around the park, impacting all roadway segments.

BK-7 1g. The primary justification of vehicular removal is the unsafe condition that exists between pedestrians, bikes and vehicles. However, the report does not indicate the extent of the current safety problem. No listing of vehicular accidents, collisions between pedestrians and vehicles, bikes and vehicles or bikes and pedestrians have been indicated. Many in the public have asked to see this data. We can only assume that the data has not been shown because no real accidents have occurred, or at least have not been reported. The design team continually indicates this safety problem and have shown it in a fast forward video in the Plaza de California, where many close calls occur. However, this method unfairly makes all movements in the area look as though they were all close calls. Can you indicate why the study has not looked more closely at public safety impacts? Also, the number of pedestrian and vehicular conflicts are listed as one method to compare the advantages between alternatives. Many of these conflicts are very minor or nonexistent. For example, the crossing of vehicles in the parking lot with the stairs leading down from the Organ Pavilion is one such location of conflict. Another is the crossing of pedestrians at the east side of the Plaza de Panama at the west end of the closed portions of the Prado. There is not real vehicular crossings at this point. The pedestrian crossings at the entry road leading down to Gold Gulch is another non-critical area. Please explain why this is the only method used to determine public safety impacts and why all of these are given equal ranking to the major crossing conflict areas around the Plaza de Panama at El Prado West or the new right turn conflict introduced on the Cabrillo bridge.

BK-8 1h. The visual simulations used in the report and by the design team do

BK-7 One of the primary objectives of the project is to reduce the conflicts between pedestrians and vehicles, as stated in EIR Section 3.1 and the TIA. This project objective is consistent with the BPMP goal to minimize vehicular and pedestrian conflicts. A conflict area is defined as locations where vehicle paths and pedestrian paths cross regardless of volume. Reducing the number of conflicts would reduce the chances of accidents, vehicle delay, and queuing/stacking. The example mentioned where the stairs leading down to Organ Pavilion is not identified as a conflict area, it is only shown on the exhibit as a reference identifying the number of pedestrians at that location. Based on the provided design of the Gold Gulch alternative, there would be one grade separated crossing and 10 on-grade crossings that are considered conflict areas.

BK-8 The project would include an all way-stop control at the new Centennial Bridge intersection. A queuing analysis was conducted with stopped conditions that included the number of vehicles and pedestrians during the peak hour and resulted in no significant impacts.

LETTER

RESPONSE

<p>not show a stop sign being used at the new intersection at the Centennial Bridge. However, a significant number of pedestrians and cyclists cross this point currently. Surely a stop sign will be required for safety. If so, has this been taken into account on the congestion levels of the modeling? If no stop sign is proposed, has public safety been reviewed enough? If no stop sign is proposed, then my concerns over this route being the new direct, high speed, low congestion route is even heightened more.</p> <p>BK-9 1i. One of the major contributors to traffic flow around the Plaza de Panama results from drivers looking for the non-existent parking space. This has been documented. If a "for pay" parking structure is added at the Organ Pavilion parking lot, then won't a significant number of drivers bypass the garage and route themselves around and around the Palisades parking areas, thereby creating new pedestrian / vehicle conflicts and congestion levels? The project will result in the removal of a significant number of open and free surface parking spaces and replace them with paid parking. This will result in a change of circulation patterns and they will likely negatively affect the roads and pedestrian uses around the Palisades.</p> <p>BK-10 1j. The Gold Gulch parking structure alternative seemed to be a good alternative to the expensive parking structure proposed under the Organ Pavilion parking lot, one that would avoid the complication of loss of parking during construction and one that would make the parking structure more financially feasible. Please explain why the alternative was pared up only with a new access road coming off of Park Boulevard, instead of entering it at a similar point as the proposed parking structure. This pairing appears to be done in order to attach a significant impact to the project. Explain why a Gold Gulch alternative that allows access to it similar to the applicants proposed project, was not included? Please explain why the reported impacts for this alternative include an impact on the Veteran's memorial garden. A full intersection would not be required, so why an impact so far to the east of the new intersection?</p> <p>BK-11 1k. I am very concerned that the results of the traffic study have been based on faulty assumptions and been conducted by consultants that do not have the ability to provide an impartial assessment to the project impacts nor the benefits of the proposed project alternatives. The current traffic and civil engineers conducting the work have received significant amounts of consulting fees to date and more importantly, are likely to be the recipients of the greatest share of consulting fees if the project goes</p>	<p>BK-9 The vehicular circulation within and around the Park as well as the trip distribution for the project was modeled taking into consideration the diversion effects of a paid parking structure. As stated in the TIA (see Appendix D-2), it is estimated that 125 patrons would circulate within the core of the Park to find free parking spaces at either the Federal or Inspiration Point parking lots, and an additional 50 patrons that would normally park within the internal parking lots would circulate within the West Mesa to find free parking.</p> <p>BK-10 As mentioned in response to comment BK-2 all the alternatives were modeled based on their description in Section 9.</p> <p>BK-11 The TIA (Appendix D-2) was completed in accordance with the City's Traffic Impact Study Manual (1998) and the City's CEQA Significance Determination Thresholds (2011). The TIA was reviewed and approved by the City's Development Services Department's Transportation Engineering staff.</p>
--	---

LETTER

RESPONSE

<p>forward. Please provide information as to how the city views this apparent conflict of interest. Please indicate the amount of time that City staff have provided in assuring that the assumptions, techniques and conclusions of the study are supportable from an independent review by staff or by another consultant.</p> <p>BK-12 2) Balboa park is one of the regions richest visual environments with a extremely high visual character and intactness unequal to anywhere else in the region. Yet the visual study provides very little description of these resources nor discusses the viewer group types, viewing durations, viewer sensitivity to change. Questions and concerns on the visual environment include:</p> <p>2a. Visual impacts to the park resources have concentrated on the blocking of views to the Cabrillo Bridge and Museum of Man structures. However, not enough attention has been provided the removal of significant tree and planting resources associated with impacts from the Centennial Bridge, the Alcazar Garden reconfiguration, the access road to the parking structure and the parking structure itself. Significant tree resources will be removed throughout these areas. These should be considered as significant visual resource and visual character changes and should require a comparison between the project alternatives and the proposed project in terms of visual quality and character impacts.</p> <p>BK-13 2b. In addition to significant tree resources, the loss of other non-critical trees in the project area footprint have been downplayed. Parks are mostly about open space and landscape resources. Historic parks like Balboa Park, have positive visual qualities and areas of historic character that are very sensitive to changes. The visual study is not adequate in identifying these visual resources and indicating the impacts to the visual character of the central portions of the park. Small individual changes to some areas can be absorbed into the visual environment, but the proposed project cumulatively will be affecting large extent of areas, albeit not significantly by itself, but cumulatively they will result in a visual change to the character of the area, the viewer types found in this area are highly sensitive to visual changes and these changes include the permanent removal of significant visual resources. Yet no impacts are identified and not mitigations suggested.</p> <p>BK-14 2c. Visual impacts resulting from the bridge have been minimized as a result of the existing tree canopy that blocks view of the bridge. Though</p>	<p>BK-12 The visual analysis applies the methodologies and significance thresholds adopted by the City of San Diego (City) in its CEQA Significance Determination Thresholds (2011) in analyzing the potential impacts of the project relative to Visual Effects and Neighborhood Character.</p> <p>Significant trees found within the Central Mesa are designated as such by the CMPP. The analysis of the project's impacts on significant trees is included in Section 4.1. Specifically, the project's visual impacts relative to CMPP significant trees is addressed under Issue 2 in Section 4.3.</p> <p>BK-13 The visual analysis applies the methodologies and significance thresholds adopted by the City in its CEQA Significance Determination Thresholds (2011) in analyzing the potential impacts of the project relative to Visual Effects and Neighborhood Character. The EIR identifies and analyzes the impacts of the project on numerous visual resources, including topography and landforms, historic and architectural elements (including landscaping), the State Route 163 Scenic Highway and other view corridors located within the Park in Section 4.3. Where the project would result in significant impacts to these resources has been identified. The project would incorporate design features, including a landscape palette that is consistent with, yet not replicative of, the historic character of the Central Mesa. As concluded in Section 4.3, no feasible mitigation is available for the significant impact associated with Centennial Bridge on architectural character because, per the SOI Rehabilitation Standards, replication of an historic design is not permissible.</p> <p>BK-14 The project proposes new vegetation to supplement the existing canopy and create the next generation of tree canopy. City Parks and Recreation staff have reviewed and accepted the proposed landscaping plan. The concept of a program to ensure the future of the tree canopy throughout Balboa Park is not included in the scope of work for this project.</p>
---	---

LETTER

RESPONSE

the project may not result in the permanent removal of tree resources in this area, it is not safe to assume that these trees will remain in perpetuity. In fact, the bore beetle, syllid infections, sudden death tree syndromes, and the drought have all resulted in significant tree canopy loss in the park over the last several years. Increased concern over non-native species such as Eucalyptus as well as concerns of liability associated with tree falls during high winds compounded with the age of many of the park's trees, all indicate that these resources could go away at any time. Worst case analysis would indicate that the bridge can be seen from a scenic highway and other prominent public view points. The impacts should be listed as significant and if the project applicant proposes a method to assure that an urban forest program is put into place that assures the survival of this visual screen, then it should be considered as a mitigation.

BK-15

2d. Many of the applicants simulations and exhibits indicate tree canopies and sizes of replacement material as fully mature and of equal size to the trees that have been in the park for very long time. Current standards for visual impact studies require a worst case analysis and a realistic assumption of impacts and mitigations. Tree replacements are often only 24" or 36" box sizes and represent about 5% of the bio-mass of mature trees in the park. A typical growth period of 3-5 years is often allowed in visual simulations and studies. Even at this growth stage, the replacement trees are likely to be between 10 and 25% of the existing tree bio-mass. Simulations shown on top of the Organ Pavilion parking lot include large trees on top of the parking structure. Though the palms may be of the size indicated if they are brought in at that size, most canopy trees will only have about a 25 foot wide by 15 foot tall growth resulting from the limited growing environment likely on the parking structure. Many of these simulations should be corrected to take this into account.

Michael L. Singleton, ASLA, AICP, LEED® AP
Principal
CA LLA 2386
t: 619 294-4477 x134 | c: 619 788-2128 | f: 619 294-9965 | e: mike@ktua.com



BK-15 Most ornamental trees would reach mature height in 8 to 12 years, dependent on species. The rate of growth is dependent on the type of tree; different species grow at different rates and are influenced by several other variables such as soil condition, root space, available water, nutrients, and sunlight. Some of the native oak trees proposed may take up to 15 years to reach mature heights (40 to 50 feet).

LETTER

RESPONSE

Letter BL

From: Ron
To: DSD EAS
Subject: Plaza de Panama EIR unreadable!
Date: Wednesday, February 01, 2012 8:09:20 PM

BL-1

If you expect to get meaningful public input, PLEASE recreate the pdf file containing Part 3. The way the text is broken up, it's so difficult to read that I think the EIR would have to be considered incomplete as presented.

Ronald Sinnen
 619-299-2718

BL-1

The EIR was placed on the City's website commencing on January 23, 2012. Attention was drawn to a technical issue regarding the remote availability of Part 3 of 4 of the Draft EIR on February 2, 2012. The issue was resolved, and Part 3 of 4 was replaced (February 9, 2012) and available for the remainder of the public review period.

LETTER

RESPONSE

Letter BM

MEMORANDUM

To: Comment Reviewers of the DEIR for the Plaza de Panama Project in Balboa Park

From: Jenna Spagnolo

Subject: DEIR Letter Proposal

Date: March 22, 2012

BM-1 **Project Description:** The Plaza de Panama project will enlarge Balboa Park in San Diego by converting parking lots and streets into green space reserved for pedestrians. The project includes the diversion of vehicles around the park with a new bridge and road, as well as the construction of an underground parking structure covered by parkland. Currently, around 7,000 vehicles pass through the park daily, and the project will reclaim the park for the enjoyment of pedestrians (Plaza de Panama Project Balboa Park 2012).

BM-2 **Comments:** The biological concerns involve possible disturbances to birds covered under the Migratory Bird Treaty Act, such as nesting raptors. The mitigations proposed are to minimize damage to the size of the birds' habitat, and to prevent grading, grubbing, and excessive noise during the raptors' mating season. In my opinion, these measures do not go far enough.

BM-3 Bird's food sources must also be protected. While much research has shown that falcons can adapt to urbanized environments, this is dependent upon the limited factors of food and nesting spots (Cade et al. 1996). While the Migratory Bird Treaty Act does not explicitly protect the food sources of these birds, damaging these food sources is against the spirit of the law. Toxins from construction may prove more fatal to the birds' smaller prey, such as the bats and insects eaten by raptors (Cade et al. 1996). This project should address potential dangers to the plants and animals most necessary to the stabilization of the ecosystem. Of course, the diversion of traffic from the park may provide enough benefits to these animals to mitigate the toxins from construction. Therefore, the impact on smaller animals should be analyzed scientifically. It's great that the California gnatcatcher will be protected, but what about the park's other biological resources?

BM-1 Comment noted.

BM-2 The City acknowledges that all projects must comply with state and federal laws and regulations, including the Migratory Bird Treaty Act (MBTA). As such, language requiring compliance with the MBTA is identified within the Mitigation, Monitoring and Reporting Program (MMRP) included in the EIR (see BR-1), and is a condition of approval in the Site Development Permit. The mitigation dates for the avian surveys were identified in the biological resources report and addressed the specific conditions for the project. The City determined that the mitigation requirements identified in the EIR would reduce potential impacts to avian species to below a level of significance.

BM-3 Comment noted. The MBTA was originally established to prevent migratory birds from being killed, possessed, or otherwise taken for commercial trade of birds or their feathers. The MBTA does not protect food sources of migratory birds. See Section 4.6.1.4f.

LETTER

RESPONSE

<div data-bbox="100 305 180 337" data-label="Text"> <p>BM-4</p> </div> <div data-bbox="100 571 180 604" data-label="Text"> <p>BM-5</p> </div> <div data-bbox="531 258 707 280" data-label="Section-Header"> <p>MEMORANDUM</p> </div> <div data-bbox="224 298 1010 555" data-label="Text"> <p>Some of the trees in the park are being removed for construction and to provide better views of historical buildings. For example, the Eucalyptus trees will be removed to provide better views to the southwest façade of the California Quadrangle (SOHO 2011). Further, a rare Kauri Pine will be damaged or removed by construction near the House of Charm (ibid.). Considering raptors prefer large and old-growth forests for nesting, how will the project mitigate the loss of habitat (Cade et al. 1996)? A shortage of suitable trees may cause raptors to seek out human-made structures, such as buildings, bridges, and electrical utility structures. Perhaps the Centennial Bridge or power structures can provide space for nesting raptors.</p> </div> <div data-bbox="224 568 989 670" data-label="Text"> <p>In sum, the overall plan for eliminating traffic within Balboa Park will help make the park more commodious to pedestrians and animals. The mitigations for biological resources must be reviewed, though, to ensure that they are doing as much as possible to protect the unique and valuable life within the park.</p> </div>	<div data-bbox="1052 290 2022 381" data-label="Text"> <p>BM-4 While tree removal may increase visibility of historic buildings, the trees are being removed due to construction activities and not to provide better views.</p> </div> <div data-bbox="1142 410 2022 626" data-label="Text"> <p>The project landscaping would include trees suitable for raptor nesting (see Figures 3-34 and 3-35) that would more than replace the removed trees. In addition, the vicinity includes a substantial number of trees suitable for raptor nesting. As indicated in Section 4.6.2.3, the project construction would potentially impact raptor nesting and mitigation BR-1 would be implemented to reduce the potential impact to less than significant levels.</p> </div> <div data-bbox="1052 685 2022 808" data-label="Text"> <p>BM-5 Comment noted. The City determined the implementation of proposed mitigation measures BR-1 and LU-1 would be consistent with the City's Biology Guidelines and would mitigate impacts to biological resources to less than significant levels.</p> </div>
---	---

LETTER

RESPONSE

MEMORANDUM

Works Cited

Cade, Tom, Mark Martell, Patrick Redig, Gregory Septon, and Harrison Tordoff. 1996.

“Peregrine Falcons in Urban North America” in *Raptors in Human Landscapes: Adaptations to Built and Cultivated Landscapes*. San Diego: Academic Press Limited.

Plaza de Panama Project Balboa Park. 2012. “Information and Documents.”

Accessed online 02/28/2012, <http://www.balboapark.org/plaza-de-panama/project>.

Save Our Heritage Organization (SOHO). 2011. “SAVE OUR HERITAGE ORGANIZATION (SOHO)

PHASED ALTERNATIVE DESIGN FOR THE PLAZA DE PANAMA, CIRCULATION AND

PARKING PROJECT. BALBOA PARK, SAN DIEGO, CALIFORNIA.” Accessed online 03/20/2012,

<http://sohosandiego.org/images/051411PlazaDePanamaSOHOplan.pdf>

LETTER

RESPONSE

Letter BN

e-mail your comments to DSDEAS@san-diego.gov with the Project Name and Number in the subject line.

General Project Information:

- ☞ Project Name: BALBOA PARK PLAZA DE PANAMA
- ☞ Project No. 233958/SCH No. 2011031074
- ☞ Community Plan Area: Balboa Park
- ☞ Council District: 2 (Faulconer) / 3 (Gloria)

Comments from:

Kevin Swanson, 4203 Genesee Ave. #103-289, San Diego, CA 92117 858.272.5433

BN-1	This Project, as proposed, significantly alters the physical character of the Heart of the Park within the National Historic District boundaries. It is similar to having the Matriarch of the San Diego Regional Park System receive elective cosmetic breast enlargement surgery while on Life Support! In many ways, the proposed Plaza de Panama Committee Project resembles this comparison to major plastic surgery for Balboa Park. The proposed plan does nothing toward enhancing Balboa Park as a destination, or the National Historic District through restoring missing structures. In fact the proposed radical surgery removes forever the options of restoring the Alcazar Lot and the Organ Pavilion Lot to their former uses.	BN-1	Comment noted.
BN-2	I urge that the City Council reject the proposed extensive changes to Balboa Park's infrastructure and use the results from the Draft EIR to develop a comprehensive Park plan that includes solutions to existing and forecast needs for the Park, the surrounding communities, the City and the Region. This is a Regional Asset.	BN-2	Comment noted.
BN-3	Balboa Park is in desperate need of major repairs, estimated in 2009 to be over \$250 million, due to deferred maintenance and poor stewardship by the City of San Diego. The "limited scope" of the Project avoids the pressing need to develop and implement solutions for the entire Park that will create a healthy and sustainable environment for the next century and beyond. Instead of proposing a Park-wide internal transportation system that would eliminate private vehicles from the interior of the Park, a limited solution that destroys the option of returning the historic northward view of the California Quadrangle's exterior through a bypass bridge is proposed, together with removal of over 140,000 cubic yards of living soil (over 10,000 truck trips) to build a parking garage that encourages driving cars and parking them in the Heart of the Park. Instead of restoring the Arizona Landfill/Dump to natural open space or a use that benefits the Park, the Project proposes dumping the 140,000 cubic yards of earth on top of it, further escalating the cost of ever returning the destroyed parkland to the Public use in Balboa Park.	BN-3	Comment noted. The scope of the project is reflected in the objectives, which were developed by the applicant. The project objectives were developed pursuant to CEQA Guidelines Section 15124(b), which requires that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project.
BN-4	This Project does nothing to enhance Balboa Park as a destination. There are no forecasted increased uses of the Park, reasons for the Public to come to Balboa Park, or increased revenues that will benefit Balboa Park that could not be accomplished through a more comprehensive look at incorporating innovative ways to approach solutions that enhance the Park and benefit the Public.	BN-4	Comment noted. As indicated in Section 9, the project benefits include pedestrian improvements, resolution of pedestrian/ vehicular conflicts, additional parkland, and additional parking. While the EIR mentions some of the project benefits in the alternatives discussion, the EIR is not intended to provide a full list of project benefits.

LETTER

RESPONSE

BN-5	Should El Prado, Plaza de California, Plaza de Panama, the Mall, Pan Pacific Road East, and the Organ Pavilion Parking Lot be returned to pedestrian and parkland uses? Absolutely! As should Pan Pacific Plaza, the road ways among the International Houses, and the Alcazar Garden Parking Lot be returned to their historical uses before the "car became King, Paradise was paved over, and parking lots became favored."	BN-5	Comment noted.
BN-6	Balboa Park is a living System, and solutions should be developed and implemented based upon an understanding of the system and how it relates to the systems around it. Historically Balboa Park has not generated revenues that were specified for its maintenance and improvement. The "rents" paid by institutions within the Park vary greatly, and go into the General Fund for the City of San Diego. Various Departments within the City exercise various levels of responsibility for Balboa Park, including Real Estate Asset Department, Facilities, Park & Recreation, Energy & Utilities, Historical Resources, and others. The non-specific funding for Balboa Park has often been put at risk, and the increasing fiscal pressures on the City created by infrastructure needs that are fast approaching \$1 Billion, as well as unfunded pension liabilities, make it doubtful that Balboa Park's tremendous needs will be addressed by the City of San Diego in the near or far future without significant changes.	BN-6	Comment noted.
BN-7	The Balboa Park Conservancy has not yet made an impact, and its present leadership does not appear to have the desire to take ownership of "running" Balboa Park. The Balboa Park Celebration, Inc. non-profit created by the City to run its efforts for a 2015 Celebration is constrained by its Memorandum of Understanding (MOU) with the City to remove all trace of its activities within the Park and not leave any permanent changes. The Plaza de Panama Committee, under the MOU signed with the City that was ruled illegal, threatened to take its fundraising activities away if its proposed version is not approved.	BN-7	Comment noted. See response to comment R-3.
BN-8	How can the mutual goals of closing the Heart of Balboa Park to private vehicles, encouraging and enabling the Public to visit Balboa Park and the institutions within it, enhancing the Public's experience of Balboa Park and its National Historic District, and returning the parking lots and internal streets within Balboa Park to historical uses and a pedestrian welcoming environment be achieved by December 31, 2014 or soon after?	BN-8	Comment noted.
BN-9	<p>1) Return Balboa Park to the original "City of Dreams" and El Prado to the "Street of Dreams" concept upon which it was built for the 1915 Panama-California Exposition as an economic and regional draw.</p> <ul style="list-style-type: none"> a. Create a Balboa Park Specific Fund for this purpose b. Initiate a fundraising campaign targeted toward the world audience of people that have visited Balboa Park, visited or lived in San Diego, and others that may wish to participate in creating a "City of Dreams" and "Streets of Dreams" in Balboa Park c. Market the donation of funds for the making of innovative concrete pavers which use titanium dioxide compounds that clean the air when exposed to sunlight, and are self-cleaning d. Design the concrete pavers in hexagon/honeycomb shapes and other shapes that create interest to the eye e. Create "geoglyph" designs with the pavers that are visible from above, or can be followed (e.g. a maze) toward the goal of initiating inspiration and wonder 	BN-9	Comment noted.

LETTER

RESPONSE

BN-10

- f. Inscribe or etch each paver with the Dream of the donor, either in a pictograph or in a limited number of characters that enable visitors to make rubbings of the Dreams
 - g. Mark each paver with a Quick Read (QR) code and number that ties to an electronic database, where the donor can share their name, the story behind their Dream, and visitors can add their comments – and descendants can add their stories.
 - h. Provide each donor with their paver's coordinates, so that they know where their Dream fits within the Streets of Dreams.
 - i. For the 2015 Centennial Celebration, temporarily rename the Plaza de California as "Inspiration Plaza," Plaza de Panama as "Imagination Plaza," Plaza de Balboa as "Innovation Plaza," and Pan Pacific Plaza as "Opportunity Plaza."
 - j. Have a single paver be placed in each Plaza, with the words "Inspire," "Imagine," "Innovate," and "Dream" inscribed upon them.
 - k. Require a minimum donation for each paver, with no maximum. Assign initial locations based upon the highest donated amounts being closest to the "Imagine" paver within the Plaza de Panama and other Dreams spreading from that central point
 - l. Invite for the opening ceremonies: John Lennon's wife (Yoko Ono), Diane Disney, and others from around the globe whose imagination, inspiration, innovation, and dreams have created a better world by inspiring others.
- 2) **Create and implement a comprehensive internal and external public transit system that enhances the visitor experience to Balboa Park and San Diego.**
- a. **Close the Cabrillo Bridge to private automobiles**
 - b. **Re-stripe Fifth Avenue, Sixth Avenue, and the internal roadways on the West Mesa to enable maximized parking and traffic flow that encourages pedestrian access, and public transit access, between the Western Mesa and the Central Mesa.**
 - c. **Build a multi-use facility at Inspiration Point.** Include Parking, Park Offices, dining, flexible space for Public use such as Youth Symphony rehearsals, Club activities, and other activities within the Public Park use designation, as well as a multi-purpose sporting roof similar to San Diego State University's. The facility could demonstrate innovative building materials and energy generation technology, as well as energy efficiency, and be a destination in itself. Costs could potentially be defrayed by companies wishing to participate in building a signature facility for Balboa Park outside of the National Historic District boundary. Connect this multi-purpose facility to the West side of Park Boulevard using a tunnel that accommodates pedestrians and public light electric vehicles.
 - d. **Build an internal fleet of public light electric vehicles in cooperation with transportation and technology companies.** This fleet, using robotic software, electric induction charged motors, hydrogen fuel cells, and other innovative technologies that their developers wish to bring to the world market, could be configured in various ways. The vehicles could operate together as "trams" or separately to provide point-to-point transportation within Balboa Park (flexibility.) Fund the internal fleet through partnerships with the transportation and technology companies.

BN-10 See response to comments AX-1 and BD-1.

Several of the concepts proposed in this comment are addressed in the alternative analysis in Section 9.0: create an internal public transit system (most alternatives); close the Cabrillo Bridge to vehicular traffic (Alternatives 3A through 3D); re-stripe Sixth Avenue to allow for more parking (Rejected Alternative - Increased Surface Parking on West Side); parking at Inspiration Point (Alternative 3D); and predominant use of light electric vehicles (Rejected Alternative - Green Entry/Periphery Parking).

LETTER

RESPONSE

	<p>e. Build the infrastructure within the Park to support the “tram” routes. This could include a tunnel underneath Park Boulevard, access to a reconfigured Alcazar Garden access area, access to Old Globe Way and Zoo Drive alongside Spanish Village, access from the West Mesa via Cabrillo Bridge to a light-weight bridge on the North side of the California Tower building (behind Old Globe Administration Building), and a widened walkway/tramway alongside Park Boulevard south from the Zoo parking.</p> <p>f. Build an automated external transit system linking Downtown with University Heights. Create ways to encourage people to leave their private vehicles away from Balboa Park by removing their need to drive for accessing the Park. Work with transportation and technology companies that want their products shown off at Balboa Park as a destination.</p>	
BN-11	3) Re-create the buildings and gardens that existed in the Organ Pavilion parking area, the Alcazar Garden parking area, and Pan Pacific Plaza.	BN-11 As indicated in Section 3.0, the project includes the re-creation of the California Garden at the location of the existing Organ Pavilion parking lot. The project does not include the re-creation of other gardens or the reconstruction of historic buildings. See response to comment AG-4.
BN-12	4) Restore the historic northward looking view of the California Quadrangle by trimming the foliage and/or replacing with foliage that is more appropriate for the National Historic District.	BN-12 Comment noted. Existing view blockage of historic structures is not a significant impact of the project and, therefore, is not warranted to be addressed in the EIR. It is not a project objective to restore views.
BN-13	5) Reuse the Arizona Landfill space within Balboa Park by creating an energy production facility at that location. <ol style="list-style-type: none"> Create a grove of “solar oakz” that uses a vertical solar collection design modeled on trees to generate energy Use the methane from the landfill for power Drill into the aquifer underneath Balboa Park for geo-thermal power and water Use new low cost catalysts that reduce the energy threshold requirements to break the hydrogen/oxygen molecular bond in water Produce hydrogen and oxygen for use in powering the Balboa Park transportation fleet and power generation through a Department of Energy grant 	BN-13 Comment noted. It is noted that the East Mesa Precise Plan identifies this site to ultimately be reclaimed as passive use parkland.
BN-14	6) Enable Zoo Global to implement their underground parking plan and tie it into the internal and external Balboa Park transportation plan.	BN-14 Comment noted.
BN-15	7) Identify and implement transportation solutions that enable improved public and private vehicle access between the West Mesa, the North Mesa, and the East Mesa areas.	BN-15 Comment noted.
BN-16	8) Continue fundraising with major corporations, non-profits, wealthy individuals, and others to establish funds that make Balboa Park sustainable into the future.	BN-16 Comment noted.
BN-17	9) Treat Balboa Park as a complete system. Realize that each individual section of Balboa Park interacts with each other and the community.	BN-17 Comment noted.



Letter BO

THE CITY OF SAN DIEGO

RECEIVED

JAN 30 2011

Development Services

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: Monday, January 23, 2012

PUBLIC NOTICE OF A

DRAFT ENVIRONMENTAL IMPACT REPORT

I.O. No.: 21002440

The City of San Diego Entitlements Division has prepared a draft Environmental Impact Report for the following project and is inviting your comments regarding the adequacy of the document. The draft EIR and associated technical appendices have been placed on the City of San Diego web-site at <http://clerkdoc.sannet.gov/Website/publicnotice/pubnoticeqa.html>. Your comments must be received by Thursday, March 8, 2012, to be included in the final document considered by the decision-making authorities. Please send your written comments to the following address: E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to DSDEAS@san-diego.gov with the Project Name and Number in the subject line.

General Project Information:

- Project Name: BALBOA PARK PLAZA DE PANAMA
- Project No. 233958/SCH No. 2011031074
- Community Plan Area: Balboa Park
- Council District: 2 (Faulconer) / 3 (Gloria)

Subject: BALBOA PARK MASTER PLAN AMENDMENT, CENTRAL MESA PRECISE PLAN AMENDMENT, AND SITE DEVELOPMENT PERMIT to implement the Balboa Park Plaza de Panama Project ("proposed project"). The project includes the rehabilitation of the Plaza de Panama consistent with the 1915 through 1935 design of a ceremonial plaza and gathering space by eliminating vehicle traffic from Plaza de California, El Prado, Plaza de Panama, and the Mall. Project components include:

BO-1

1. **Plaza de Panama.** Eliminate automobile traffic from the Plaza de Panama and adjacent promenades and remove parking from the Plaza. *OK*
2. **Centennial Bridge and Road.** Construction of a new two-way bridge/road starting at the east end of the Cabrillo Bridge and continuing through the eucalyptus grove around the southwest corner of the Museum of Man. *Disagree with this item #2*
3. **Alcazar Parking Lot and Walkway.** Redesign the Alcazar parking lot to provide additional accessible parking as well as passenger drop-off, museum loading, and valet. *Disagree with item #3*
4. **El Prado and Plaza de California.** Allow for pedestrian use of El Prado and Plaza de California by re-routing traffic to the bypass road and bridge. *Disagree with item #4*

Form Revised 6/06

BO-1 Comment noted.

LETTER

RESPONSE

5. **The Mall and Pan American Promenade.** Reclaim both the Mall and Pan American Road for pedestrian access by rerouting vehicle traffic west of Pan American Road. *OK*
6. **Parking Structure and Roof-top Park.** Construct a new parking structure with a roof-top park and garden at the location of an existing Organ Pavilion surface parking lot. The new multi-level underground structure would consist of 265,242 square-feet with 798 parking spaces on three levels. The new rooftop park would consist of 2.2 acres. *Disagree with item #6*

The site is not included on any Government Code listing of hazardous waste sites.

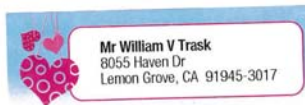
Applicant: Plaza De Panama Committee / City of San Diego Park and Recreation Department

Recommended Finding: The draft Environmental Impact Report concludes that the project would result in significant environmental impacts to the following areas: LAND USE (GENERAL AND COMMUNITY PLAN CONSISTENCY / MSCP), HISTORICAL RESOURCES (BUILT ENVIRONMENT / ARCHAEOLOGY), VISUAL EFFECTS (NEIGHBORHOOD CHARACTER/ARCHITECTURE), NOISE (TEMPORARY CONSTRUCTION), TRAFFIC/CIRCULATION, BIOLOGICAL RESOURCES (RAPTOR), and PALEONTOLOGICAL RESOURCES.

Availability in Alternative Format: To request this Notice, the recirculated draft Environmental Impact Report, Initial Study, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact E. Shearer-Nguyen at (619) 446-5369. The draft Environmental Impact Report and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. If you are interested in obtaining additional copies of either the Compact Disk (CD), a hard-copy of the draft Environmental Impact Report, or the separately bound technical appendices, they can be purchased for an additional cost. For information regarding public meetings/hearings on this project, contact Michelle Sokolowski at (619) 446-5278. This notice was published in the SAN DIEGO UNION TRIBUNE and SAN DIEGO DAILY TRANSCRIPT and distributed on Monday, January 23, 2012.

BO-2 *The least costly program would be to close traffic on Cabrillo Bridge - only pedestrian and shuttle bus. Build a huge parking lot on the east side of 6th ave. instead of over the Organ Pavilion lot. Have a shuttle bus pick up passengers at 6th Avenue. This would be the least disruption to the park.*



Bill Trask

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department

BO-2 This concept has been considered and is analyzed as Alternative 3C, West Mesa Parking Structure Alternative, in Section 9.3.3C.

LETTER

RESPONSE

Letter BP

PLAZA DE PANAMA PROJECT

Comment submitted by Adrienne Turner – March 19, 2012

- BP-1** The plan as proposed will result in significant improvements to Balboa Park. The bypass bridge is a good solution to removing traffic from El Prado. However, in solving one problem it will create another.
- More vehicles will be encouraged to cross the Laurel Street bridge in the belief that the bypass will lead them to available parking spaces in the new parking structure. Drivers will experience disappointment and frustration when they find no spaces are available. The result will be same as the existing condition: vehicles endlessly circulating and backed-up traffic on all the streets. Hot vehicle engines give off as much pollution as exhaust fumes, especially when idling. The net result will be increased air pollution which will be harmful to both visitors and the park's ecosystem.
- BP-2** The major problem that the public experiences when trying to visit the park is the **lack of parking spaces**. Even on a cool day in winter, when there is no special event occurring in the park, the parking spaces are filled up before noon and vehicles are endlessly circulating hoping to get a space when somebody leaves.
- BP-3** The minimal net gain of parking spaces proposed by the plan will not make a dent in the tremendous need for additional spaces that has been well known for decades. Millions of dollars will have been spent on a plan to improve Balboa Park, yet the major problem for visitors will not have been resolved. The public will feel misled, disenfranchised, frustrated and angry.
- The proposed plan is too good to have such a negative result.
- BP-4** **The Solution: Alternative 14**
- Park visitors in private vehicles entering the park from the west side (West Mesa) will be directed to a new 650 stall below-grade parking structure (with rooftop park per existing conditions) at Quince Street and 6th Avenue – direct access from freeway (see attached). Trolley shuttle available to entrance of Plaza de California.
- Parking structure charge: \$10 per car – fee receipt is a **coupon** for a value exchange for same day at any museum or other park venue.
- The Profit-Producing Power of Coupons is well known: Expanding customer base; existing customers encouraged to return; additional sales, etc. Coupons are measurable and accountable and can be adjusted to maximize effectiveness and business goals. Examples:
- Weekday coupon: 100% redeemable with purchase of equal or higher value.
Weekend coupon: 50% redeemable with purchase of equal or higher value.
Holiday coupon: 25% off single purchase.
Special Event coupon: 20% off single purchase.
- Note: Coupons must be used on the date of issue**
- BP-5** **Option:** QUALCOMM challenge: develop software for the following:
The parking structure will employ new state-of-the-art "cyberspace" parking. Vehicles entering the structure will stop at a "scanning" space. Width, length and height of the vehicle will be processed and the "proceed to parking" LED will direct driver to an available appropriate-sized space.

adriennet@znet.com

619.270.0048

- BP-1** As indicated in Section 4.4, the project would not result in additional traffic on the Cabrillo Bridge and would have a less than significant parking impact. The project would alleviate some of the traffic failures (street segments and intersections) that would occur in the future due to a natural increase in vehicular trips associated with population growth, if no improvements are made. This is illustrated in Tables 9-3 and 9-4, when comparing the project and the No Project Alternative.

As indicated in Section 4.5.5, an air quality impact analysis was completed to determine project impacts to sensitive receptors. As shown in that analysis, the project air quality impacts to sensitive receptors would be less than significant.

- BP-2** See response to comment BP-1.
- BP-3** Comment noted. See response to comment BP-1.
- BP-4** Pursuant to CEQA Guidelines Section 15126.6(c), the EIR includes a reasonable range of alternatives, each of which could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant project effects. However, pursuant to CEQA Guidelines Section 15126.6(f) an EIR need not address every conceivable alternative.

The concept proposed in this comment is a variation of the West Mesa Parking Structure Alternative (3C), and many of its impacts would be similar to those associated with the alternative as addressed in Section 9.3.3C. Like the West Mesa Parking Structure Alternative, this variation would avoid the project's significant and unmitigable secondary land use (plan consistency), historical resource (built environment), and visual quality (architectural character) impacts associated with the Centennial Bridge component of the project. However, this alternative variation would likely result in greater traffic impacts compared to the project, due to the closure of the Cabrillo Bridge, in both the near-term and in 2030. Internal and external roadways/intersections would operate poorly, constituting significant mitigable and unmitigable impacts.

- BP-5** Comment noted.

PLAZA DE PANAMA PROJECT DRAFT EIR RELEASED*Document studies an unprecedented 13 alternatives to the proposed project***BP-6** Alternative 14

Cabrillo Bridge Open w/ Centennial Bridge and two new Parking Structures (same as proposed project except for an additional parking structure on West Mesa) – Park visitors in private vehicles entering the park from the west side (West Mesa) directed to new 650 stall below-grade parking structure (with rooftop park per existing conditions) at Quince Street and 6th Avenue. Other vehicle traffic (tour buses, trolleys, taxis, ADA and through traffic) continues on Cabrillo Bridge, rerouted from El Prado via new Centennial Bridge. No vehicular traffic or parking along El Prado and Plaza de Panama. Alcazar Lot reconfigured for ADA parking, valet, and drop-off; new 800 stall below-grade parking structure behind Organ Pavilion with a rooftop two-acre park.

Parking structures charge \$10 fee per car – fee receipt is a coupon for a value exchange for same day at any museum or other park venue. Trolley shuttle to entrance of Plaza de California.

BP-7 Direct freeway access to the new parking structure on Quince Street:

163 North – Quince Street off-ramp leads directly to the entrance of the new parking structure.

94 West to 163 North – Quince Street off-ramp exit (approx. ½ mile)

5 North to 163 North – Quince Street off-ramp exit (approx. ½ mile)

5 South to 163 North (also 10th Ave. exit to downtown) – Quince Street off-ramp exit (approx. ½ mile)



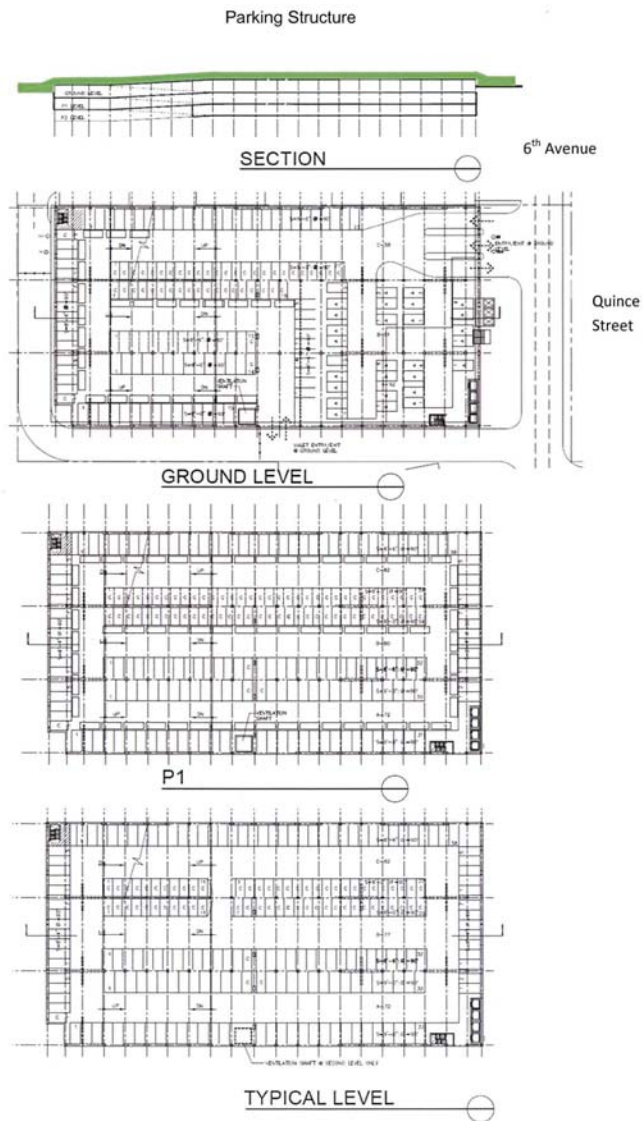
Proposed Alternative 14 submitted by Adrienne Turner, February 18, 2012

BP-6 Comment noted. See response to comment BP-1.

BP-7 Comment noted. See response to comment BP-1.

LETTER

RESPONSE



LETTER

RESPONSE

Letter BQ

From: [Michael C. Vincent](#)
To: [DSD EAS](#)
Subject: Plaza de Panama
Date: Tuesday, March 20, 2012 11:18:25 PM

To whom this concerns;

BQ-1

I would like to express my joy at hearing about the Plaza de Panama Project. I have been a frequent visitor of the Park, especially the Promenade, for close to thirty (30) years and I feel that what you've proposed here will return it to where it was designed and meant to be.

What a beautiful space to have, right here in the heart of the city, at our disposal, to find a peaceful meaning to this complicated world we live in today.

Long time overdue, but 'Thank You' for the effort you've put in to try and get this done. It's beautiful, I wish you the best and I can't wait to see the finished product.

Sincerely;

Michael C. Vincent
619-280-5543

BQ-1 Comment noted.

LETTER

RESPONSE

Letter BR

From: [Mat Wahlstrom](#)
To: [DSD EAS](#)
Subject: Balboa Park Plaza de Panama/233958
Date: Wednesday, March 21, 2012 11:59:57 PM

Dear Ms. Shearer-Nguyen,

- BR-1 I am writing as a private citizen, not as a member of or in capacity for any organization or business entity.
- BR-2 This is an EIR on a site designated as a historic national landmark. Why was the only Federal authority it was submitted to the U.S. Fish and Wildlife Service? Why was it not submitted to both the U.S. Department of Interior's Heritage Preservation Services of the National Park Service or the Advisory Council on Historic Preservation? Both of these entities have oversight on whether national historic status is subject to being compromised--the key consideration of the EIR.
- BR-3 The EIR states, "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." Please note that no other project goal is mentioned other than this sentence. As such, any consideration presumed or inferred as a goal should be summarily rejected or considered inferior in importance to maintaining historical continuity. But further, as the EIR indicates, the modern-day Balboa Park is the result of competing visions but only one history. Therefore any claim to "original vision" must present extraordinary evidence for its current absence from reality. The EIR fails to demonstrate that any implemented Balboa Park Plan ever denied vehicles, horse-drawn or otherwise, equal access to the Central Mesa with pedestrians on parallel routes on a regular basis. This is immediately relevant in considering the six (6) elements considered essential to this project:
- BR-4 "1. Plaza de Panama. Eliminate automobile traffic from the Plaza de Panama and adjacent promenades and remove parking from the Plaza." The EIR fails to demonstrate this element as anything other than contemporary and elective.
- BR-5 "2. El Prado and Plaza de California. Allow for pedestrian use of El Prado and Plaza de California by re-routing traffic to the bypass road." The EIR language construes that these two spaces are not allowed for pedestrian use--an assertion that is counterfactual to everyday observation, and would mean that no one has hitherto been able to enter the front of the Museum of Man. The EIR needs to specify how this plan would improve current access, not brazenly claim it will finally allow it.
- BR-6 "3. Bypass Road and Bridge. Construction of a new two-way bypass road starting at the east end of the Cabrillo Bridge and continuing through the eucalyptus grove around the southwest corner of the Museum of Man to the Alcazar Parking Lot." Hereinafter referred to as the Centennial Bridge, and objections noted hereafter; for now suffice to note that such a structure is completely out of historical context.
- BR-7 "4. Alcazar Parking Lot and Walkway. Redesign the Alcazar Parking Lot to provide additional accessible parking as well as passenger drop-off, museum loading, and valet." Let the record show that the EIR recognizes the need to dedicate area for these non-public-

BR-1 Comment noted.

BR-2 Consultation is required with any responsible or trustee agency, or any public agency with jurisdiction by law (PRC Section 21104). The project was submitted to the State Office of Historic Preservation and comments were provided by the State Office of Historic Preservation (see Letter F). The National Park Service was invited to comment on the project but did not submit a letter.

BR-3 Project objectives are identified in Section 3.1. The BPMP identifies the eventual reclamation of the Prado and Pan American Plaza areas as pedestrian plazas. As indicated in the Historic Resources Technical Report (Appendix B-1), there is a great deal of photographic and written evidence that indicates that private automobiles were not permitted in these areas for the duration of the two Expositions, 1915-16 and 1935-36. Only trams, small carts, and busses were allowed.

BR-4 See response to comment BR-3.

BR-5 Comment noted.

BR-6 Comment noted. The EIR addresses historic impacts of the Centennial Bridge in Section 4.2.

BR-7 Comment noted. Pursuant to PRC Section 21002.1(a), the purpose of the EIR is to identify the project's significant environmental impacts, alternatives to a project, and to indicate the manner in which those significant effects can be mitigated or avoided. The project would not result in a significant impact related to traffic congestion within the Alcazar parking lot, as discussed in Section 4.4. Additionally, the Alcazar Garden would not be permanently impacted or altered by the reconfiguration of the Alcazar parking lot (as discussed in Section 4.5.5 [air quality/vehicular traffic] and Section 4.12.2 [noise/land use compatibility]). Some temporary construction impacts would occur, as disclosed in Sections 4.5.4 (air quality/construction emissions) and 4.12.6 (noise/construction); however, these impacts would be short in duration and less than significant.

The No Project (No Development/Existing Condition) Alternative describes the traffic conditions that would occur both in the near-term and in year 2030, if no improvements are made within the project site. See Section 9.3.1.

LETTER

RESPONSE

<p>transportation modes of access to the Plaza de Panama. And when one reflects on the artificial and needlessly congested aspect of this Alcazar Parking Lot design, the EIR should have to explain why so much immediate destruction to the physical landscape and incidental destruction of the atmosphere of the adjacent Alcazar Gardens is necessary, especially when smart use of the existing traffic access to park facilities is not only available but superior.</p> <p>BR-8 "5. Esplanade & Pan American Road. Reclaim both the Esplanade and Pan American Road for pedestrian access by rerouting vehicle traffic west of Pan American Road." Again, the obligation is on the EIR to demonstrate how these widely-sidewalked on both sides routes are inimical to pedestrians. It seems less like roads are being reclaimed for pedestrians than paved for commuter traffic. The burden of proof is on the EIR to show that, if commuter traffic is a project element, that the plan explicitly says as much, and incorporates it as sensitive to Balboa Park as a National Historic Landmark.</p> <p>BR-9 "6. Parking Structure and Roof-top Park. Construct a new parking structure with a roof-top park and garden at the location of an existing Organ Pavilion surface parking lot. The new multi-level underground structure would consist of 265,242 square-feet with 785 parking spaces on three levels. The new rooftop [sic] park would consist of 97,000 square-feet." The EIR should be at pains to show how such a structure is part of the "original vision", historical or otherwise, of anyone. But more importantly, the EIR needs to look at this element in isolation from the others, to see if or how a parking structure on this surface lot is better or worse than one at Pan American Plaza or any of the other surface lots, and whether the introduction of paid parking in any form will lead to detriment in public enjoyment.</p> <p>To summarize:</p> <p>BR-10 At no point in the EIR is there any positive historical evidence presented to support construction of the Centennial Bridge. No full quotations or critical citations from Goodhue, Olmsted, Marston or any other historical source from the park's first fifty years have been provided to justify the elimination of non-pedestrian traffic from the route and plazas originally constructed for it. Photos taken from events in the 1920s when traffic was temporarily restricted are no more valid for arguing original intent than contemporary photos showing the same traffic absence during December Nights. There simply is no historical support presented for the introduction of such a radical, visually inescapable and completely alien innovation such as the Centennial Bridge. If such evidence exists, it needs to be shared; if it does not, the claim to historical worth needs to be removed as invalid for consideration.</p> <p>BR-11 The only argument (not citation) I can find in the EIR for the Centennial Bridge is a negative one: "Whether this obstruction [by eucalyptus trees] of the iconic view from the West Mesa and Cabrillo Bridge was the intention of either Bertram Goodhue or Frank B. Allen is unknown, but this condition has apparently characterized the complex for around 90 years." Surely the EIR should have a more compelling reason to slice a permanent scar across the face of Goodhue's "dream city" than that no one anticipated that the City wouldn't pay to properly landscape it? In fact, the rest of the EIR is at pains to state that even more vegetation will be needed to obscure the Centennial Bridge, in an approximation of historical consonance. If neglect was not the original intent, then why make it indispensable to the future reality?</p> <p>Further, in the absence of any historical evidence to the contrary presented in the EIR, it specifically defies logic and common sense to presume that the creation of an uninterrupted</p>	<p>BR-8 See response to comments BR-5 and BR-7. Traffic through the Park is an existing condition, not a project element. The project impact to the Balboa Park National Historic Landmark is addressed in Section 4.2.</p> <p>BR-9 The Conclusions state the following:</p> <p>6. Organ Pavilion Parking Structure, Roof-top Park, Tram and Arizona Street Landfill. Construct a new parking structure with a roof-top park and garden at the location of an existing Organ Pavilion surface parking lot. The new multi-level underground structure would consist of 265,242 square feet with 797 parking spaces on three levels. The new rooftop park would be 2.2 acres. An accessible tram shuttle would link parking in the new structure with the Plaza de Panama. Excess soils from excavation of the parking structure would be exported to the nearby Arizona Street Landfill.</p> <p>See response to comment BR-7.</p> <p>The proposed parking structure is consistent with the approved CMPP. It is not intended to be "historical" since this area has been heavily altered since 1915 and is a non-contributing element to the historic district.</p> <p>The EIR includes an alternatives analysis in compliance with CEQA Guidelines Section 15126.6, which requires a reasonable range of alternatives that would reduce a significant project impact and meet most of the project objectives. Pursuant to CEQA Guidelines Sections 15131 and 15064(e) public enjoyment is not a physical environmental impact required to be evaluated.</p> <p>BR-10 Comment noted. The Centennial Bridge is accurately described in the EIR as a new element, not a historic recreation element.</p> <p>Evidence shows that private automobiles were not permitted in the central areas of Balboa Park for the duration of the two Expositions, 1915-16 and 1935-36. Refer to the Historical Resources Technical Report (Appendix B-1) for more information.</p> <p>BR-11 Comment noted. See response to comment BR-7. The significant impacts of the Centennial Bridge are adequately addressed in the EIR.</p>
--	--

LETTER

RESPONSE

<p>BR-12 line-of-sight roadway, beginning at the edge of Bankers Hill on Laurel Street through El Prado all the way to the central fountain, is an accident of design rather the singular intent of it. Alternately, the EIR should be at pains to illustrate--with objectively verifiable data--how the Plaza de California has become such a site of vehicular carnage that historicity should be damned.</p> <p>BR-13 To the best of my knowledge, no group either for or against the existing Central Mesa Precise Plan has any objections to the elimination of most if not all parking from the central area of the Plaza de Panama. Why does the EIR refuse to consider this widely accepted idea as conceptually separable from the highly contentious plan for the Centennial Bridge? ("K. Alternatives")</p> <p>BR-14 The current Centennial Bridge is essentially identical to the Alternate B, Estrada Land Planning bypass bridge project that was proposed in 1989 and defeated. Why is there no mention of this proposal or the issues surrounding its consideration and rejection in the current EIR, or any indications as to how the current plan would resolve similar concerns?</p> <p>BR-15 Finally, the EIR does not consider the impact of cutting off unobstructed pedestrian access to the Central Mesa across both sides of the Cabrillo Bridge. Given the Project's fetish for pedestrian safety, the EIR needs to consider that the entire sidewalk along the south side of the bridge will likely need to be closed to pedestrian traffic, due to hazards presented by the blind turn and sudden bottleneck to cross busy traffic once at the Centennial Bridge--precisely the concern the current EIR is using to close the Plaza de California.</p> <p>Respectfully yours,</p> <p>Mat Wahlstrom 3925 1/2 Centre St San Diego, CA 92103 Phone: 619-295-9213</p>	<p>BR-12 Comment noted. See response to comment BR-7. The purpose of the EIR is to evaluate project environmental impacts.</p> <p>It is noted that El Prado, including the Cabrillo Bridge, was originally closed to private vehicles. Historically Plaza de California was also closed to private vehicles. The use of the Plaza has been significantly limited and altered by the two-way road bisecting it. Non-historic changes to Plaza de California have been introduced over the years (planter boxes, fences, etc.) to accommodate cars.</p> <p>BR-13 The project which is the subject of the EIR includes the elimination of parking from Plaza de Panama, as well as a new circulation pattern via the Centennial Bridge that would eliminate vehicles from the Plaza.</p> <p>It is noted that the EIR addresses the following alternatives that do not include the Centennial Bridge: No New Parking Structure Alternative (Alt 3A), Organ Pavilion Parking Structure Alternative (Alt 3B), West Mesa Parking Structure Alternative (Alt 3C), Inspiration Point Parking Structure Alternative (Alt 3D), Tunnel Alternative (Alt 4Bi), Stop Light (One-Way) Alternative (Alt 4Bii), Modified Precise Plan without Parking Structure Alternative (Alt 4Biii), and the Half-Plaza Alternative (Alt 4Biv).</p> <p>BR-14 The previous proposal is unrelated to the project application presently being considered by the City.</p> <p>BR-15 As indicated in Section 3 (Project Description), the project does not include the closure of the Cabrillo Bridge to pedestrian traffic. The project would not increase traffic hazards for motor vehicles, bicyclists, or pedestrians and would result in a less than significant safety hazard impact (Section 4.4.5).</p> <p>The proposed Centennial Bridge has been designed to provide a safe crossing for pedestrians at the connection point to the Cabrillo Bridge. There would be an all way-stop sign at the new Centennial Bridge intersection, with a designated crosswalk for pedestrians and bicyclists.</p> <p>Pursuant to CEQA Guidelines Section 15126.6(a) project alternatives were selected to provide a reasonable range of alternatives to the project which would feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project. Because an alternative closing the Cabrillo Bridge to pedestrians would not reduce a significant project impact, it is not required to be considered as a project alternative.</p>
---	---

LETTER

RESPONSE

Letter BS

From: [John Wotzka](#)
To: [DSD EAS](#)
Subject: draft EIR for the Plaza de Panama project, comment
Date: Friday, March 09, 2012 3:03:24 PM

- BS-1 In Section 4.2.2. The Centennial Bridge being inconsistent with SOI Rehabilitation
 BS-2 Standards 2 and 9. What about the congested traffic with too many cars?
 BS-3 Figure 3-2 roadway and centennial Bridge could be masked with palms and lessen
 BS-4 the visual impact. Figure 3-4 Plaza de Panama in 1915, looks people good.
 BS-5 Figure 4.0-1 Parking structure roof looks great.
 BS-6 Page 4.9-1 Greenhouse Gas Emissions (GHG). The new plan would send the GHGs in
 a different direction and make the pedestrian area cleaner.
 Overall the draft EIR looks great and well done.

John G Wotzka, Downtown San Diego

- BS-1 The project would alleviate some of the traffic failures (i.e., congestion) at both street segments and intersections that would occur in the future due to a natural increase in vehicular trips associated with population growth. This is illustrated in Tables 9-3 and 9-4, when comparing the project and the No Project Alternative.
- BS-2 The project would include substantial landscaping around the Centennial Bridge (see Figures 3-34 and 3-35), which would lessen the visual impact of the public view impact of the bridge (Section 4.3.2). However, the visual impact related to neighborhood character/architecture would remain significant with the inclusion of screening vegetation. See response to comment AQ-1.
- BS-3 Comment noted.
- BS-4 Comment noted.
- BS-5 Comment noted.
- BS-6 Comment noted.



Ziebarth Associates

Letter BT

February 8, 2012

City of San Diego
Development Services Department
Environmental Division
1222 First Ave. MS 501
San Diego, CA 92101
Attn: Elizabeth Shearer-Nguyen

Re: Plaza De Panama –Balboa Park Draft EIR Review

Dear Ms. Shearer-Nguyen

- BT-1** After reviewing a significant portion of the DEIR, though admittedly not all of it, I have significant concerns about the analysis. I wish that I would have had more time to provide more detailed comments, but the following are my comments and observations on the Draft Environmental Impact Report (DEIR) for the Plaza De Panama Project in Balboa Park:
- BT-2** **The DEIR concludes that the Project has significant unavoidable impacts that can't be mitigated. Thus the City Council will need to make overriding findings. –I would agree.**
- The DEIR concludes that the Half-Plaza (Master Plan) alternative for the Plaza de Panama was the environmentally preferred. However, the City Council will still need to make overriding findings. –I would agree that it is the environmentally preferred. However I question why a solution that has previously been approved by the city council would require new overriding findings. Please clarify.**
- BT-3** • It is important to understand what is driving the Project to have significant unavoidable impacts prior to the creation or determination of overriding findings. The driving force is the Project Objectives. As part of the Notice of Preparation, the point was raised that the project objectives should not be written to predetermine the solution. However that is exactly what has occurred.
- Project Objectives:**
- BT-4** **1. Remove vehicles** from the Plaza de Panama, El Prado, Plaza de California, the Mall (also called "the Esplanade"), and Pan American Road East while maintaining public and proximate vehicular access to the institutions which are vital to the park's success and longevity.
- 2. Restore pedestrian and park uses** to El Prado, Plaza de Panama, Plaza de California, the Mall, and re-create the California Gardens behind the Organ Pavilion.
- 3. Improve access** to the Central Mesa through the provision of additional parking, while maintaining convenient drop-off, disabled access, and valet parking, and a new tram system with the potential for future expansion.

Architecture / Planning

2900 Fourth Ave Ste 204 San Diego, CA 92103 Phone 619.233.6450 Fax 619.233.6449

BT-1 Comment noted.

BT-2 The Half-Plaza Alternative was not previously approved by the City. This alternative was analyzed in full within Section 9.0. The alternative analysis in Section 9.0 identified significant unmitigable impacts for the Half-Plaza Alternative. Specifically, as identified in Section 9.4, the Half-Plaza Alternative would result in a significant historic impact, as it would alter the spatial relationship/circulation pattern within the NHL.

Pursuant to CEQA Guidelines Section 15093, the decision makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations has been prepared for the consideration of the decision making body (City Council) and left to its discretion to determine whether to approve or deny the project or any of the alternatives, or combination thereof.

BT-3 The EIR identifies the significant and unmitigable project impacts on the physical environment; these are stated in Section 5.0. The project objectives were developed pursuant to CEQA Guidelines Section 15124(b), which requires that a project description contain a statement of objectives sought by the proposed project and states that the statement of objectives should include the underlying purpose of the project.

BT-4 Comment noted.

LETTER

RESPONSE

<p>Plaza De Panama DEIR Comments—Ziebarth</p> <p>4. Improve the pedestrian link between the Central Mesa's two cultural cores: El Prado and the Palisades.</p> <p>5. 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.</p> <p>6. Complete all work prior to January 2015 for the 1915 Panama-California Exposition centennial celebration.</p> <p>BT-5 Project Objective 1, which calls <u>for the removal of vehicles</u>, predetermines that there are only two solutions: the Centennial Bridge or the closing the bridge. Further the objective states that public and proximate vehicular access to the institutions. Thus, it predetermines that closing the bridge is not an option that meets the objective. The Master Plan calls for "reducing automobile and vehicular conflicts." The project objective also contradicts the goal of accessibility to the park. As shown in the Traffic Impact Analysis (TIA) the majority of vehicles going through the park actually do not stop and park. Rather, people choose to tour the park in a vehicle at 15 miles per hour and stop for pedestrians so that they can see and experience the historical structures and nature of the park. This objective as written eliminates that park experience.</p> <p>Historical Analysis:</p> <p>BT-6 1. Cabrillo Bridge was designed as a vehicular and pedestrian bridge historically and not as a pedestrian bridge. This is clear from its design.</p> <p>BT-7 2. The entry from the Cabrillo Bridge to the Plaza de California was designed reminiscent of historical Spain, where there was the main archway entry for vehicles and pedestrian gateways on either side.</p> <p>BT-8 3. The Prado was designed to draw pedestrians along the buildings and the Alcazar Garden under covered arcades.</p> <p>BT-9 4. The Project Team has used the East Prado as an example of the activation of the previous street as a justification for the closer of the street. I would contend that the justification for the closing of the street was to eliminate the through traffic. Further, I would contend that the activation of the street has led to the underutilization of the original historically intended covered pedestrian arcades.</p> <p>BT-10 5. Even the Project Team admits that the current roadway was used during the 1915 Exposition for ceremonial vehicles.</p> <p>BT-11 6. Even the Project Team admits that historically, vehicles have been allowed through the Plaza de Panama, the Prado, the Plaza de Panama, and the Mall since 1918 (some 94 years of historical use).</p> <p>BT-12 7. The Project Objective One is to eliminate all vehicles from Plaza de Panama, the Prado, the Plaza de Panama, and the Mall. The historical justification of this "objective" would seem to be suspect.</p> <p style="text-align: right;">2</p>	<p>BT-5 Comment noted. As indicated in the alternatives analysis (Section 9.0), there are alternatives that include closure of the Cabrillo Bridge while maintaining vehicular access to institutions. Thus, this objective does not limit it to the options suggested by this comment.</p> <p>As indicated in Section 4.4.5, the project would reduce pedestrian/vehicle conflicts consistent with the BPMP.</p> <p>Similar to existing trends and proposed project, through traffic is estimated to comprise 15 to 20 percent on average of the vehicles in the park (see Appendix D-1).</p> <p>While the project would prevent cars from touring the Plaza de Panama, El Prado, Plaza de California, the Mall, and Pan American Road East, the area would be accessible on foot or bicycle and the tram would be available for those seeking a vehicle tour. The reduction of private vehicle tours of the park is not considered a significant environmental impact.</p> <p>BT-6 The design of the Cabrillo Bridge clearly anticipated use by vehicles. The engineers were aware that, at the very least, construction vehicles as well as ceremonial cars would be using the bridge. The Cabrillo Bridge was closed to private vehicles for the duration of the two expositions, 1915–16 and 1935–36.</p> <p>BT-7 Comment noted.</p> <p>BT-8 Comment noted.</p> <p>BT-8 Comment noted.</p> <p>BT-9 Comment noted.</p> <p>BT-10 Comment noted.</p> <p>BT-11 Comment noted.</p> <p>BT-12 Comment noted. The project objectives were prepared pursuant to CEQA Section 15124(b) to support the underlying purpose of the project.</p> <p>The Plaza de California and west El Prado would be redesigned to approximate their historic condition in 1915–16. Plaza de Panama and the Mall would be rehabilitated to accommodate pedestrian usage. The improvements proposed within all four of these areas would fully comply with SOI Standards for Rehabilitation.</p>
--	--

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

BT-13

8. Further the Project does not propose to restore these areas to their historical condition, but rather to rehabilitate these spaces to their new vision of the area. Therefore, history is not a justification for what is proposed.

Alternative:

BT-14

The DEIR has done a yeoman's job at looking at an extensive series of alternatives and combination of alternatives. However, the combinations are not necessarily the only approach. There are two basic components to this project: One is the rehabilitation of the Plaza de Panama, El Prado, Plaza de California, the Mall (also called "the Esplanade") while reducing vehicular/ pedestrian conflict. The second is addressing the parking structure. I believe the following comprehensive alternative addresses most of the environmental concerns to be addressed below:

BT-15

1. To rehabilitate the Plaza de Panama, all parking and valet drop-offs should be eliminated from the plaza (Half Plaza Alternative—Master Plan Alternative—environmentally preferred alternative) or Half Plaza Alt Biv. That would allow approximately 90% of the plaza to be used for landscape and pedestrian activities on a permanent daily basis. The north half of the plaza would be defined by the Museum of Art and the Timken Museum. The southeast side might become an outdoor extension of the Prado restaurant or some other activity. The southwest part of the plaza might become an extension of the Mingei Museum. On those special ceremonial times (like the city currently) the entire plaza could be closed to all vehicular traffic and the entire plaza could be used. At those special events, the Plaza de California, the Prado and the Mall would also be entirely available for use.

How is this done?

- 1) Reconfigure Balboa Drive to pick up 78 parking spaces which is more than the parking in the Plaza de Panama. This can be done for minimal cost and time with negligible environmental impact.
- 2) Reconfigure the Alcazar parking lot for drop and disabled parking similar to the Project. By eliminating the Centennial Road the vehicular/ pedestrian conflicts and potential discrimination exposure to the City with only the disabled parking being required to cross the Centennial Road is avoided. By having the Alcazar parking lot be used for only drop off and disabled parking the traffic congestion of people driving around looking for parking in the lot will be eliminated. Propose that the access road to Alcazar parking lot be two lanes coming into a T connection to the southbound Mall road. This creates a safer intersection with the Mall road than the current exit road from the Alcazar parking lot and allows the current access roadway to be restored to more usable park land. It would also avoid the Project's impacts on Palm Canyon and the loss of park land to create slopes and retaining walls to separate Centennial Road from the pedestrians.
- 3) With replacement parking being provided as well as drop-off and disabled parking (with less environmental impacts than the Project), the Plaza de Panama could be

3

BT-13 See responses to comments BT-7, BT-8, and BT-12.

BT-14 Comment noted.

BT-15 Comment noted. The alternative presented here is similar to Half Plaza Alternative evaluated in Section 9.3.4Biv. The Half Plaza Alternative is identified as the environmentally superior alternative. The suggested revisions to this alternative would not reduce a significant project impact or meet additional project objectives, and therefore were not added to the EIR alternatives analysis (see response to comment BD-1).

The project would have a less than significant impact to parking (Section 4.4.4), traffic hazards (Section 4.4.5), and parkland (Section 8.6). Further, pursuant to CEQA Guidelines Section 15126.6(a), to the EIR provides a reasonable range alternatives which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project. Because this proposed revision to the Half-Plaza Alternative would not reduce a significant project impact, it is not required to be considered as a project alternative.

The proposed design of El Cid Island is new; therefore, it is not historic. This alternative would have significant adverse historic impacts because it would reduce Plaza de Panama to half of its historic size and introduce several new layers of trees and landscaping that would screen views of the two most historic buildings on the Plaza.

The project anticipates cross-park traffic (15 to 20 percent) as analyzed in the TIA. This through traffic is not expected to circulate around the mall and return to the same travel path as its entry. Essentially, the through traffic entering from southeast would exist northwest towards the Cabrillo bridge, and the through traffic entering from northwest would exit at the southeast end at Presidents Way and Park Boulevard, thus, not similar to the Half-Plaza Alternative.

Refer to the Half-Plaza Alternative analysis in Section 9.3.4Biv.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

- rehabilitated. With the simplified scope, it should be easy to meet the final Project Objective of being completed by January 2015.
- 4) To provide bike circulation as called in the Master Plan, the pavement treatment of the existing 32' roadway can be modified to designate a 5' bike lane each direction through the Plaza de Panama, El Prado, Plaza de California, the Mall (also called "the Esplanade") and reduce the vehicle lane to 11' which would create an additional traffic calming measures. This would create a designated bike lane versus having bikes share a 14' lane with vehicles on Centennial Road as proposed in the Project.
 - 5) Reduce the one way road width through the Mall to an 11' vehicle lane and a 5' bike lane. Thus traffic calming will be maintained and approximately 12' of roadway width will be restored to park land on each side of the Mall.
 - 6) Due to the historic symmetrical design of the EL Cid Island and the Mall, the alternative 4Biv would propose to maintain the one way circulation around the mall. This would also reflect the fact (reflected in the TIA vehicle data) that a large number of vehicles do come up from President's Way simply to see the Plaza de Panama and loop back to the south without parking. This would maintain this form of accessibility to the park facilities. The alternative is the Half Plaza configuration.
 - 7) Maintaining the roadway though the Prado on a normal daily basis draws pedestrians along under the covered arcades to expose them to the sculpture garden or the Alcazar Garden and encourages the activations of these arcades. At times of special events, it would be closed to vehicular traffic.

Conclusion: Either the Half Plaza Master Plan or the Half Plaza Alt 4Biv would have less significant impacts than the Project.

BT-16

A

2. Parking Structure:

Alternative is to build the parking structure in the previously disturbed and underutilized Gold Gulch rather than in the Organ Pavilion parking lot. The alternative proposes to build a parking structure across Gold Gulch with a road connecting to a traffic signal at Park Boulevard and the Navy Hospital and a reconfigured the Pan American Road to President's Way.

- 1) The loop connection to Park Boulevard provides ease of access to the parking structure (especially for special events) versus the one road connection in the Project to President's Way and Park Boulevard. Thus, the congestion at the intersection of President's Way and Park Boulevard with the access to parking at Inspiration Point will be reduced.
- 2) The Gold Gulch parking structure utilizes existing terrain to achieve natural ventilation versus expensive retaining walls and ventilation shafts which require man-made mounding to screen the structure as proposed in the Project.
- 3) The Gold Gulch alternative only requires 51,500 cy of dirt to be exported versus the 142,000 cy of dirt to be exported with the project. Thus the Gold Gulch alternative will have less impact on hauling, traffic impacts, air quality impacts, and the Arizona land fill than the Project. The Alternative would reduce the number of trucks from

B

4

BT-16 A Comment noted. The alternative presented here is similar to Gold Gulch Parking Structure Alternative evaluated in Section 9.3.4Ai.

Pursuant to CEQA Guidelines Section 15126.6(a) project alternatives were selected to provide a reasonable range of possible project designs which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project. Because this proposed revision to this alternative would not reduce a significant project impact or meet additional project objectives, it is not required to be included in the EIR alternatives analysis. The project does not propose mechanical ventilation within the parking structure and would not have a significant impact to: the Presidents Way/Park Boulevard intersection, parking; access, construction-related parking; parkland, or a bus parking impact. Further, the EIR includes a reasonable range of alternatives.

B It is noted in Section 9.3.4Ai that the Gold Gulch Alternative would require less soil export than the project. Section 9.3.4Ai states the Gold Gulch Alternative would have incrementally less air quality and GHG emission impacts relative to the project due to the reductions in soil export.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

C

approximately 10,400 trucks to approximately 3,800 trucks (over 6,600 truck reduction) which I believe is a significant reduction in impacts.

D

4) The Gold Gulch alternative can provide the 1,000 parking spaces called for in the Balboa Park Master Plan (BPMP) versus the 798 parking spaces provided in the Project.

E

5) The Gold Gulch Alternative provides enough parking to eliminate the parking in the Palisades and thus eliminate the 2030 significant traffic impact at Centennial Road and President's Way which the Project does not.

F

6) The Gold Gulch Alternative is expandable but the Project's parking structure is not.

G

7) The Gold Gulch Alternative has existing natural tree screening where the Project's screening is man-made.

H

8) The Gold Gulch alternative provides parking access to the east side of the Central Mesa while the Project's parking structure does not.

I

9) The Gold Gulch alternative avoids potentially dangerous access intersections between Centennial Road and the Project's parking structure.

J

10) Gold Gulch alternative can be built prior to the elimination of the Organ Pavilion parking or Palisades parking and thus provides less impact than the Project on the current operation of the park.

K

11) The Gold Gulch alternative allows for the restoration of over 5.5 acres of usable park land versus 2.2 acres on the Project's parking structure roof and has greater flexibility of restoration design and will be more economical to build and maintain than on top of a roof.

12) The Gold Gulch alternative can be designed to accommodate buses and bus parking, but the Project parking structure cannot.

Conclusion: I would suggest that there are more benefits and less environmental impacts with the Gold Gulch Parking Structure Alternative than the Project's parking structure. Many of the benefits of the Alternative appear to be undervalued or misstated in the DEIR and some of the impacts in the DEIR have been misrepresented. Examples are the misrepresentation of the number of parking spaces in the alternative (798 spaces stated versus potentially 1,000 or more) or understating the value of the loop access to Park Boulevard to reduce traffic congestion at President's Way and Park Boulevard or the understatement of the impacts associated with the difference in the export quantity of dirt or the increase in usable park land.

However the two parts of this proposed alternative should be evaluated separately because either parking structure solution can be used with either Plaza de Panama solution.

Master Plan Consistency Comments:

1. The Master Plan calls for "reducing automobile and vehicular conflicts." Is a pedestrian crossing automatically considered a conflict? Are there acceptable levels of pedestrian activity crossing a roadway that is considered safe? It happens all the time throughout the city and in this case this

5

BT-16 (cont)

C Comment noted.

D As described in Section 4.4, the project includes mitigation measures and the implementation of which would reconfigure the Centennial Road and Presidents Way intersection if failure occurs by year 2030. Therefore, like the Gold Gulch Alternative, if parking in the Palisades area is eliminated, the project has a mechanism to reduce potentially significant traffic impacts associated with this loss.

E Comment noted.

F Comment noted.

G Parking access from the east side of the Central Mesa to the Project's parking structure is provided via Presidents Way and Centennial Road.

H The project includes two access points to the parking structure from Centennial Road and would provide exclusive left turn lanes and exclusive through lanes to avoid any stacking or queuing. As indicated in Section 4.4.5, the project would not result in any traffic hazards or unsafe conditions to pedestrians, bicyclists or motorists.

I Comment noted.

J See response to comment AG-4.

K Comment noted.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

- approximately 10,400 trucks to approximately 3,800 trucks (over 6,600 truck reduction) which I believe is a significant reduction in impacts.
- 4) The Gold Gulch alternative can provide the 1,000 parking spaces called for in the Balboa Park Master Plan (BPMP) versus the 798 parking spaces provided in the Project.
 - 5) The Gold Gulch Alternative provides enough parking to eliminate the parking in the Palisades and thus eliminate the 2030 significant traffic impact at Centennial Road and President's Way which the Project does not.
 - 6) The Gold Gulch Alternative is expandable but the Project's parking structure is not.
 - 7) The Gold Gulch Alternative has existing natural tree screening where the Project's screening is man-made.
 - 8) The Gold Gulch alternative provides parking access to the east side of the Central Mesa while the Project's parking structure does not.
 - 9) The Gold Gulch alternative avoids potentially dangerous access intersections between Centennial Road and the Project's parking structure.
 - 10) Gold Gulch alternative can be built prior to the elimination of the Organ Pavilion parking or Palisades parking and thus provides less impact than the Project on the current operation of the park.
 - 11) The Gold Gulch alternative allows for the restoration of over 5.5 acres of usable park land versus 2.2 acres on the Project's parking structure roof and has greater flexibility of restoration design and will be more economical to build and maintain than on top of a roof.
 - 12) The Gold Gulch alternative can be designed to accommodate buses and bus parking, but the Project parking structure cannot.

J Conclusion: I would suggest that there are more benefits and less environmental impacts with the Gold Gulch Parking Structure Alternative than the Project's parking structure. Many of the benefits of the Alternative appear to be undervalued or misstated in the DEIR and some of the impacts in the DEIR have been misrepresented. Examples are the misrepresentation of the number of parking spaces in the alternative (798 spaces stated versus potentially 1,000 or more) or understating the value of the loop access to Park Boulevard to reduce traffic congestion at President's Way and Park Boulevard or the understatement of the impacts associated with the difference in the export quantity of dirt or the increase in usable park land.

However the two parts of this proposed alternative should be evaluated separately because either parking structure solution can be used with either Plaza de Panama solution.

Master Plan Consistency Comments:

- BT-17** 1. The Master Plan calls for "reducing automobile and vehicular conflicts." Is a pedestrian crossing automatically considered a conflict? Are there acceptable levels of pedestrian activity crossing a roadway that is considered safe? It happens all the time throughout the city and in this case this

5

BT-16 (cont)

J See response to comment AG-3 for an explanation on why additional parking spaces were not included in the Gold Gulch Parking Structure Alternative.

Although a second road access from Park Boulevard and Inspiration Point Way would give options to drivers, it would not improve internal circulation. The vehicles may have different travel paths than the project but their destinations (parking lots, garage etc.) would remain the same. The majority of trips would still be entering and exiting from Park Boulevard and Presidents Way, thus still impacting the intersection.

Although a second road access from Park Boulevard and Inspiration Point Way would give options to drivers, it would not improve internal circulation. The vehicles may have different travel paths than the project but their destinations (parking lots, garage etc.) would remain the same. The majority of trips would still be entering and exiting from Park Boulevard and Presidents Way, thus still impacting the intersection.

The issue of soil export impacts and usable parkland increases are addressed above as a part of this response to comment BT-16.

BT-17 See response to comment BI-1 and BK-7. The project would be consistent with this BPMP goal to reduce pedestrian and vehicle conflicts. As discussed in Section 4.4.1.7, pedestrian/vehicular conflicts are locations where vehicles and pedestrian paths cross regardless of volume. Pedestrian crossing safety was not evaluated in terms of level of service; however, there are guidelines for designing safer crossings such as marked crosswalks, clear visibility, advance warnings and signage. A traffic hazards analysis was completed and discussed in Section 4.4.5. Figure 4.4-17 provides an illustration of proposed pedestrian crossing volumes. The EIR analysis concluded that the project would reduce pedestrian/vehicular conflicts and the project would result in a less than significant traffic hazard.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

BT-18

- is a narrow park road with reduced speeds. The elimination of parking and the drop-off in the Plaza de Panama would significantly reduce automobile and vehicular conflicts as called for in the Balboa Park Master Plan.
2. The Master Plan calls for “improved public access to the park through an improved integrated circulation system, convenient drop-off points, better parking management, and improved and increased security. The improved circulation system shall de-emphasize the automobile while increasing public access to the park and the park facilities.”
 - a. Yet, the Project proposes the sharing of 14 feet wide lanes by automobiles and bicycles traveling around a series of serpentine (dangerous?) curves and through tunnels with no separated bike lane. Is this the type of safe integrated circulation system envisioned in the Master Plan?
 - b. Where are bus drop-offs to be located? Is it in the Alcazar Parking Lot with the other drop offs? Is there a place for bus parking? Clearly there is no place for bus parking in the Organ Pavilion parking structure? How is this addressed as part of the parking management?
- Alternative: convert the existing 32' wide roadway to 5' designated bike lanes along the edge of two 11' wide vehicular lanes which will induce traffic to flow slower and deter through traffic. Reduce the road width in the mall to 16' to accommodate one way 11' vehicular traffic and 5' designated bike land while returning the balance of the road to useable park land with enhanced pedestrian circulation.
- c. The Project proposes the tram shares the widened pathway with the pedestrians, which would seem to raise question about compliance with the American Disability Act which calls for separation of vehicles and the disabled. Is this the integrated circulation system envisioned in the Master Plan?
- Alternative: Integrate the tram system into the vehicular circulation route with pull out locations for pick-up and drop off stops. This will also slow traffic down, deters through traffic, and de-emphasize the automobile.
- 1) Yet, the traffic patterns and volumes in TIA indicate that the majority of vehicles actually drive through the park and actually do not actually go into the parking lots. In fact, according to the TIA, more vehicles drive up from the south of the Plaza de Panama and loop back to the south without looking for a parking spot than pull into the Organ Pavilion parking lot or the Palisades parking lot. This would support the premise that public access for people to simply tour the park in an automobile is an integrated part of the overall park experience. I would also contend that deterring through traffic is not the same as deterring people from driving slowing and compatibly through the park to experience and see the historical components that Balboa Park has to offer.
 - d. The Project proposes to create a vehicular roadway that is devoid of the park experience as the vehicle moves through serpentine curves avoiding bicycles through a tunnel and with berms and retaining walls screening the visual experience of the park. Thus, the only reason to use Centennial Road is to get through the park or to get to a

6

BT-18 As indicated in Section 4.4.5, the project would not increase traffic hazards for motor vehicles, bicyclists, or pedestrians and would result in a less than significant safety hazard.

Currently, there is no bike lane provided on Pan American Road East or El Prado. Also, the existing roadway includes curves and a traffic circle. The proposed Centennial Road and Centennial Bridge would be a shared lane Class-III bike lane (not striped.)

Also, bicycles would continue to have access through Plaza de Panama, El Prado, Plaza de California, the Mall, and Pan American Road East with the implementation of the project, and bicyclists would not have to use Centennial Road and Bridge to pass through the Park. While the design of the Centennial Road passes underneath the proposed pedestrian overpass, the project does not include tunnels. See Section 3.0 for a full discussion of the project description.

The existing lanes that the project would replace are 12 to 20 feet wide, with the majority being approximately 14 to 16 feet wide. The project lanes would be 14 feet wide, which is slightly less than the typical existing width.

Considering the existing conditions and the project improvements, the project would not increase traffic hazards.

As indicated in Table 4.1-2, the project would be consistent with this improved public access BPMP goal.

LETTER

RESPONSE

<p>Plaza De Panama DEIR Comments—Ziebarth</p> <p>is a narrow park road with reduced speeds. The elimination of parking and the drop-off in the Plaza de Panama would significantly reduce automobile and vehicular conflicts as called for in the Balboa Park Master Plan.</p> <p>2. The Master Plan calls for “improved public access to the park through an improved integrated circulation system, convenient drop-off points, better parking management, and improved and increased security. The improved circulation system shall de-emphasize the automobile while increasing public access to the park and the park facilities.”</p> <p>a. Yet, the Project proposes the sharing of 14 feet wide lanes by automobiles and bicycles traveling around a series of serpentine (dangerous?) curves and through tunnels with no separated bike lane. Is this the type of safe integrated circulation system envisioned in the Master Plan?</p> <p>b. Where are bus drop-offs to be located? Is it in the Alcazar Parking Lot with the other drop offs? Is there a place for bus parking? Clearly there is no place for bus parking in the Organ Pavilion parking structure? How is this addressed as part of the parking management?</p> <p>Alternative: convert the existing 32' wide roadway to 5' designated bike lanes along the edge of two 11' wide vehicular lanes which will induce traffic to flow slower and deter through traffic. Reduce the road width in the mall to 16' to accommodate one way 11' vehicular traffic and 5' designated bike land while returning the balance of the road to useable park land with enhanced pedestrian circulation.</p> <p>c. The Project proposes the tram shares the widened pathway with the pedestrians, which would seem to raise question about compliance with the American Disability Act which calls for separation of vehicles and the disabled. Is this the integrated circulation system envisioned in the Master Plan?</p> <p>Alternative: Integrate the tram system into the vehicular circulation route with pull out locations for pick-up and drop off stops. This will also slow traffic down, deters through traffic, and de-emphasize the automobile.</p> <p>1) Yet, the traffic patterns and volumes in TIA indicate that the majority of vehicles actually drive through the park and actually do not actually go into the parking lots. In fact, according to the TIA, more vehicles drive up from the south of the Plaza de Panama and loop back to the south without looking for a parking spot than pull into the Organ Pavilion parking lot or the Palisades parking lot. This would support the premise that public access for people to simply tour the park in an automobile is an integrated part of the overall park experience. I would also contend that deterring through traffic is not the same as deterring people from driving slowing and compatibly through the park to experience and see the historical components that Balboa Park has to offer.</p> <p>d. The Project proposes to create a vehicular roadway that is devoid of the park experience as the vehicle moves through serpentine curves avoiding bicycles through a tunnel and with berms and retaining walls screening the visual experience of the park. Thus, the only reason to use Centennial Road is to get through the park or to get to a</p>	<p>BT-19 Bus parking/drop-off would be provided on Presidents Way near the intersection of Presidents Way and the proposed pedestrian/tram promenade. Bus drop-off could also occur within the Alcazar parking lot on the south side of the roadway for east bound buses.</p> <p>See response to comment BT-16 for an explanation of why this alternative is not required to be included in the EIR.</p> <p>BT-20 The proposed shared condition has been reviewed and approved by the City as compliant with ADA.</p> <p>See response to comment BT-16 for an explanation of why this alternative is not required to be included in the EIR.</p> <p>BT-21 The proposed Centennial Road would change the traffic patterns as identified in the TIA in the sense that vehicle traffic would no longer be accessing Plaza de Panama. The proposed roadway would prevent cars from touring the Plaza de Panama, El Prado, Plaza de California, the Mall, and Pan American Road East. For those looking for a touring experience, these areas would be accessible on foot or bicycle and the tram would be available for those seeking a motorized tour.</p> <p>BT-22 The primary purpose of the Centennial Bridge and Centennial Road is to convey traffic through the Park (Section 3.4.3). While the design of the Centennial Road passes underneath the proposed pedestrian overpass, the project would not include a tunnel. See response to comment BT-21 regarding the touring experience.</p> <p>The proposed parking structure was sized to provide a net gain in parking, while also being naturally ventilated and staying within the location as originally proposed in the CMPP. A larger structure of 1,000 to 1,500, at this location would require additional levels and mechanical ventilation. The project includes the adoption of an amendment to the CMPP. The CMPP Amendment would revise the overall circulation concept of the project including the number of parking spaces. As indicated in Section 4.4.4, the project parking impact would be less than significant and the addition of parking spaces to the parking structure is not warranted.</p>
--	--

LETTER

RESPONSE

<p>Plaza De Panama DEIR Comments—Ziebarth</p> <p>BT-23 parking lot. If the touring park experience is completely eliminated, won't that create a greater demand for parking than the Project proposes because only by parking will you be able to see the park? Note that the Balboa Park Master Plan (BPMP) calls for 1,000 – 1,500 parking spaces in the Organ Pavilion Parking structure, the project only proposes 798 spaces or roughly 200 spaces less than the minimum called for in the BPMP.</p> <p>Alternative: Gold Gulch parking structure can provide 1,000 parking spaces with potential for expansion. The DEIR mistakenly stated that the Gold Gulch parking structure alternative would provide the same 798 spaces that was in the Project's Organ Pavilion parking structure. Gold Gulch parking structure is not limited by the environmentally challenging design constraints that need to be manipulated to theoretically provide natural ventilation into the Organ Pavilion parking structure. None of this has been identified in the DEIR. This constraints include massive retaining walls, additional costs, potentially useable park land to create an artificial canyon on the east side of the parking structure and large ventilation shafts on the south side, which then are being hidden with extensive berms to hide the adverse visual impacts of the parking structure on the park experience. This also is not identified in the DEIR as a visual impact that is being mitigated.</p> <p>BT-24 3. The Master Plan calls to "Preserve, enhance, and increase free and open park land and establish a program of ongoing landscape design, maintenance, and replacement."</p> <p>a. The Project creates 2.2 acres of useable parkland and garden on top of the roof deck of the Organ Pavilion parking structure. The DEIR fails to identify the amount of park land that is unusable due to and the manufactured canyon on the east side of the parking structure or the ventilation shafts to attempt to provide natural ventilation to the parking structure or the usable park land lost to create berms to visually hide the parking structure. Further the DEIR fails to identify the usable parkland lost to create the slope bank and retaining wall between the Centennial Road and the Mall.</p> <p>Alternative: Gold Gulch parking structure provides enough additional parking to restore both the Organ Pavilion parking lot and the Palisades parking lot to usable park land resulting in approximately 6.6 acres of new usable park land in just that area without the limitations of developing a park on top of a parking deck.</p> <p>4. The Master Plan calls for to "restore or improve existing building and landscape areas within the Park."</p> <p>a. The project states that the Plaza de Panama, El Prado, Plaza de California, the Mall and Pan American Road East would be restored as open landscaped/ plaza areas resulting in 6.3 acres being restored to pedestrian use as part of the plaza. Please confirm this calculation. Does this calculation include the existing pedestrian areas of the Plaza de Panama and the Plaza de California? Based on my rough calculations, the roadway through the Plaza de California and the Prado is approximately 14,500 sf. The existing vehicular area in the Plaza de Panama appears to be approximately 65,000 sf, the Mall area is approximately 19200 sf and the Pan American East Road is approximately 29,607 sf. That totals to approximately 128,307 sf or approximately 3 acres. Combined with the 2.2 acre roof top park, it would appear that there is approximately 5.2 acres of new</p> <p>7</p>	<p>B-23 See response to comments AG-3 and AG-21.</p> <p>Berms and landscaping are identified as project design features which would screen the eastern elevation of the parking structure from view. Section 4.3 addresses the visual and landform alteration impacts associated with the Organ Pavilion parking structure, consistent with the City's 2011 Significance Determination Thresholds.</p> <p>B-24 As indicated in Table 4.1-2, the project would be consistent with this BPMP goal.</p> <p>The areas referenced as unusable parkland are not included in the 2.2 acres of parkland added by the proposed rooftop park. In total, approximately 6.3 acres of parkland would be regained with the project as proposed. This includes the plazas, pedestrian promenades, and usable parkland regained in the Organ Pavilion parking lot. See response to comment BT-32.</p> <p>Overall, the project would result in an increase of parkland, and recreation impacts would be less than significant. This has been clarified in Section 8.6.</p> <p>See response to comment BT-16 for an explanation of why this alternative is not required to be included in the EIR.</p>
---	--

Plaza De Panama DEIR Comments—Ziebarth

parking lot. If the touring park experience is completely eliminated, won't that create a greater demand for parking than the Project proposes because only by parking will you be able to see the park? Note that the Balboa Park Master Plan (BPMP) calls for 1,000 – 1,500 parking spaces in the Organ Pavilion Parking structure, the project only proposes 798 spaces or roughly 200 spaces less than the minimum called for in the BPMP.

Alternative: Gold Gulch parking structure can provide 1,000 parking spaces with potential for expansion. The DEIR mistakenly stated that the Gold Gulch parking structure alternative would provide the same 798 spaces that was in the Project's Organ Pavilion parking structure. Gold Gulch parking structure is not limited by the environmentally challenging design constraints that need to be manipulated to theoretically provide natural ventilation into the Organ Pavilion parking structure. None of this has been identified in the DEIR. This constraints include massive retaining walls, additional costs, potentially useable park land to create an artificial canyon on the east side of the parking structure and large ventilation shafts on the south side, which then are being hidden with extensive berms to hide the adverse visual impacts of the parking structure on the park experience. This also is not identified in the DEIR as a visual impact that is being mitigated.

3. The Master Plan calls to "Preserve, enhance, and increase free and open park land and establish a program of ongoing landscape design, maintenance, and replacement."

- a. The Project creates 2.2 acres of useable parkland and garden on top of the roof deck of the Organ Pavilion parking structure. The DEIR fails to identify the amount of park land that is unusable due to and the manufactured canyon on the east side of the parking structure or the ventilation shafts to attempt to provide natural ventilation to the parking structure or the usable park land lost to create berms to visually hide the parking structure. Further the DEIR fails to identify the usable parkland lost to create the slope bank and retaining wall between the Centennial Road and the Mall.

Alternative: Gold Gulch parking structure provides enough additional parking to restore both the Organ Pavilion parking lot and the Palisades parking lot to usable park land resulting in approximately 6.6 acres of new usable park land in just that area without the limitations of developing a park on top of a parking deck.

4. The Master Plan calls for to "restore or improve existing building and landscape areas within the Park."

- a. The project states that the Plaza de Panama, El Prado, Plaza de California, the Mall and Pan American Road East would be restored as open landscaped/ plaza areas resulting in 6.3 acres being restored to pedestrian use as part of the plaza. Please confirm this calculation. Does this calculation include the existing pedestrian areas of the Plaza de Panama and the Plaza de California? Based on my rough calculations, the roadway through the Plaza de California and the Prado is approximately 14,500 sf. The existing vehicular area in the Plaza de Panama appears to be approximately 65,000 sf, the Mall area is approximately 19200 sf and the Pan American East Road is approximately 29,607 sf. That totals to approximately 128,307 sf or approximately 3 acres. Combined with the 2.2 acre roof top park, it would appear that there is approximately 5.2 acres of new

7

BT-25 The project restores approximately 6.3 acres of parkland to pedestrian use. The 6.3 acreage includes approximately 0.70 acre for Plaza de Panama and Prado; approximately 1.65 acres for Plaza de Panama; approximately 0.75 acre for the Mall; approximately 2.54 acres for the Organ Pavilion rooftop park and pedestrian overpass; and approximately 0.64 acre for the Pan American East Promenade. The 6.3-acre parkland calculation does not include all of the pedestrian walk ways around the existing Plaza de Panama, but the stairs and walkways in front of the Museum of Man are included as they are being improved and restored to historical dimensions. This acreage calculation is consistent between all of the alternatives analyzed in the EIR that included the Centennial Bridge as.

The EIR analyzes the Gold Gulch Alternative as submitted previously. This alternative is detailed in Section 9.0. This comment provides modification of this fully analyzed alternative. The Gold Gulch Alternative included in the EIR adds a larger park in the location of the Organ Pavilion parking lot than the project. Under the alternative, the Organ Pavilion park would total 2.9 acres. There is, however, a loss of 0.8 acre of usable parkland as the park road traverses eastward to Park Boulevard. Therefore, this alternative and the project would net a similar 6.3 acres of parkland. The EIR analysis of this alternative does not identify the restoration of the Palisades parking lot as part of the alternative. The EIR states that the Gold Gulch parking structure is large enough to eliminate parking at the Palisades.

Allowing traffic through Esplanade Mall and narrowing the roads was not part of the Gold Gulch alternative included in the EIR. The same for converting the Palisades to parkland. Therefore, these features are not included in the alternative's analysis.

Approximately 0.17 acre of useable parkland would be lost from the Centennial Road and parking structure for the project, as compared to 0.63 acre lost from the Gold Gulch alternative from the new park roads extending to Park Boulevard and through to the War Memorial. Both of the above acreages are not included in the 6.3-acre net gain calculation for the Gold Gulch analysis.

Per the above, the Gold Gulch Parking Structure parkland increase calculation provided in the EIR is accurate.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

usable park land created or restored by the project. The existing pedestrian areas in the Plaza de Panama and the Plaza de California are approximately 1 acre. Perhaps this is included in the area of restoration. This should be made clear in the DEIR Table 4.1-2. Item BP-4 implies that the Plaza de Panama, El Prado, Plaza de California, the Mall and Pan American Road East restores 6.3 acres and the roof top park creates an additional 2.2 acres.

Alternative:

- 1) The elimination of the parking and drop-off in the Plaza de Panama combined with the narrowing of the roads in the Mall from 28' to 16' on each side of the landscape median and the modification of the access to the Alcazar parking lot to a two lane road allows for the creation of approximately 56,435 sf or 1.29 acres based on not counting existing pedestrian areas in the Plaza de Panama. Thus when combined with the restoration of the Organ Pavilion parking lot and the Palisades parking lot, there is a net restoration of usable park land of 7.9 acres versus 5.2 acres assuming that the existing pedestrian areas of the Plaza de Panama and the Plaza de California
- 2) The DEIR does not address the loss square footage of the Centennial Road or the road from the Gold Gulch parking structure to Park Boulevard. If the connection is built from the Gold Gulch parking structure to Park Boulevard, there would be a loss of approximately 15,324 sf of park land and the construction of Centennial Road from the Alcazar parking lot to the tunnel on the south side of the Organ pavilion is approximately 19,000 sf of loss usable park land.
- 3) The DEIR should verify both the project's as well as my calculations for accuracy and then accurately identified the comparison so the decision makers can evaluate.

BT-26

5. The Master Plan addresses "Special Events: New and redeveloped facilities of the Central Mesa would be designed to accommodate multiple uses, including special events and maximum public access."

The Alternative of the half Plaza combined with the Gold Gulch parking structure provides for more open park land for special events than the Project Including the Organ Pavilion parking lot and the Palisades parking lot. As is currently done, the Plaza de Panama, El Prado, Plaza de California, the Mall and Pan American Road East can be closed on special events. The loop circulation from Park Boulevard along President's Way and back to Park Boulevard would provide two access points to Park Boulevard to ease traffic congestion during special events. The Gold Gulch parking structure would also accommodate additional bus parking during special events which the Project's Organ Pavilion parking structure could not.

BT-27

6. Master Plan: "Parking: With the exception of the Organ Pavilion parking structure, existing parking areas would not be expanded and new parking facilities would not be located within the Park unless: It is demonstrated that site parking and/or transportation alternatives have not, after adequate period of testing and use, provided adequate accessibility; and an equal or a greater amount of usable open parkland is recovered through the provision of parking facilities."

8

BT-26 Comment noted.

BT-27 This discrepancy is disclosed in Table 4.1-2, line item BP-9. The lesser number of parking spaces proposed by the project would not result in any significant impacts.

See response to comment BT-16 for an explanation of why this alternative is not required to be included in the EIR

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

- a. The Master Plan calls for 1,000 to 1,500 parking spaces in the Organ Pavilion parking lot. The Project provides only 798 spaces. This discrepancy is not identified in Table 4.1-2.

Alternative:

- 1) The Gold Gulch parking structure does not have the restraint from natural ventilation concerns that the Organ Pavilion Parking structure has and can be designed to accommodate 1,000 parking spaces consistent with the BPMP. Further it is in the location in the Central Mesa is approximate to the location identified in the BPMP if not exactly. Further the BPMP states that consideration should be given if "an equal or a greater amount of usable open parkland is recovered through the provision of parking facilities." As stated above, the Gold Gulch parking structure allows for the rehabilitation of the Palisades parking lot back to useable park land as called for in the BPMP unlike the Project's Organ Pavilion parking structure. Thus, the Alternative achieves a land use consistency which is not addressed in the Project.

BT-28

7. Master Plan Circulation Policy: Accessibility: Accessibility to and within Balboa Park shall be increased through alternative modes of transportation including transit, inter-park shuttles, an intra park tram and bicycle facilities.

BT-29

8. "PRADO AND PALISADES RESTORATION: The Prado and Palisades plazas shall be restored as pedestrian-oriented plazas in which traffic is minimized and conflicts with pedestrians are reduced."

- a. The DEIR states that "the project would not provide improvements within the Palisades area; however, the proposed design has been developed to enable the Palisades to be returned to pedestrian uses at a future time."

Comment:

- 1) Actually the proposed design has not been designed to enable the Palisades to be returned to pedestrian uses at a future time. The BPMP calls for 1,000 to 1,500 spaces in the parking structure in order to eliminate the parking in the Palisades. The Organ Pavilion parking lot is limited to 798 spaces and has no potential for expansion to meet the goal of the BPMP. Further the TIA indicates that the intersection of Centennial Road in 2030 will fail without the elimination of the parking in the Palisades. What is not addressed in the DEIR is that there will probably be increased traffic in the Palisades parking lot as people look for free parking spaces before they go to the paid parking structure. As a result there will be increased vehicle/ pedestrian conflicts in the palisades as well as increased traffic congestion in the Palisades as a result of the Project. However the Alternative of the Gold Gulch parking structure would provide for the elimination of the parking in the Palisades. The DEIR mistakenly indicated that the Gold Gulch parking structure would have the same failure at Centennial Road and President's Way, because it assumed that the parking in the Palisades would remain.
- 2) The DEIR fails to identify that the Half Plaza or BPMP plan for the Plaza de Panama is consistent with this goal.

9

BT-28 Comment noted.

BT-29 It is not an objective of the project to replace parking that is removed from the Palisades in the future. The parking structure inclusion of 797 parking spaces would not prevent the Palisades from being converted to pedestrian use only in the future. If necessary, it is anticipated that replacement parking for a future Palisades project could be provided elsewhere in Balboa Park.

The trips distributed and circulated within the Park were analyzed with paid parking in consideration. An estimated 30 percent (Saturday peak hour) are expected to park at the paid structure. There is also estimated 15 percent (Saturday peak hour) cut-through traffic as it occurs in existing conditions, the remainder are expected to park at Federal/Aerospace lot (30 percent Saturday peak hour) and Palisades lot (25 percent Saturday peak hour). With these distributions, there is no failure that occurs at the Palisades for the proposed project since much less traffic is going through and fewer pedestrian conflicts than existing conditions. The Gold Gulch Alternative analyzed in the EIR would remove parking from the Palisades parking lot, it only mentions that the parking garage is large enough to eliminate parking at the Palisades. The project and the Gold Gulch Alternative were analyzed with the same percentage distributions

Both the Gold Gulch and the Half-Plaza Alternatives would be consistent with this goal. Consistency with this goal would not result in a reduction in any land use impacts associated with either alternative.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

BT-30

9. "Replacement Parking: Replace parking displaced by the landscaping of the Prado and Palisades plazas by the construction of an Organ Pavilion parking structure. That structure shall be designed according to the following design parameters:

- The top of the structure shall not rise above the floor of the Organ Pavilion;
- The structure shall be built within the existing footprint of the Organ Pavilion parking lot and would provide between 1,000-1,500 spaces;
- All parking shall be contained within the structure, not on visible deck areas; and
- The structure shall be screened from view through landscaping."

Comment: The BPMP was drafted with the understanding that 1,000-1,500 spaces would fit within the existing footprint of the Organ Pavilion parking lot. The DEIR indicates that the depth of this parking structure "would pose substantial engineering constraints, including shoring, mechanical ventilation, and special fire protection parameters." The purpose of the parking garage size in the BPMP was to accommodate the elimination of the parking in both the Palisades and the Plaza de Panama. After the in-depth analysis of the constraints of this parking structure by the Project Team, it would seem that an alternative solution next to the Organ Pavilion site should be analyzed so as not to adversely impact the future rehabilitation of the Palisades parking lot. This would seem to be a short sighted solution. The alternative of the Gold Gulch parking structure meets all of the design parameters except that it is not in the exact footprint but the alternative is in close proximity to the Organ Pavilion with its central location in the Central Mesa.

BT-31

10. "PEDESTRIANS/BICYCLES: Provide pedestrian and bicycle access into the Park from public rights-of-way and City open space." DEIR concludes:

- a. "Pedestrian and bicycle access would be provided on the Centennial Bridge."
- b. Bicycle access would be provided on Centennial Road.
- c. Bicycle and pedestrians will share the plaza and the pan American Promenade.

Comment:

- 1) Cars and bicycles are forced to navigate the same 14' wide lane going around the tight curves of the Centennial Bridge and Centennial Road rather than having a separate bicycle lane. The curve is so tight that a 2' safety zone was added.

Alternative: Utilizing the existing roadway, separate bicycle lanes can be established by utilizing striping or different pavement treatment and thus result in an environmentally safer configuration. Also by having a straighter path, there is greater site distances and visibility which will make the bicycle lane safer. Isn't the potential of bicycle and pedestrian accidents from uncontrolled interaction greater than vehicle/ pedestrian conflicts at controlled locations?

BT-32

11. HANDICAP ACCESS: Handicapped and elderly access to the Park shall be ensured.

- a. DEIR concluded that the relocation of the disabled parking to the regraded ADA compliant Alcazar parking lot addresses the consistency issue.

Comment:

10

BT-30 Comment noted. See response to comment BT-36.

BT-31 The proposed 14-foot shared width of the Centennial Bridge and Centennial Road was developed through the City project review process. It should be noted that bicycle traffic through the pedestrianized plaza areas of the Park would not be excluded and would provide a safer alternative for bicyclists than providing only striping to delineate between vehicles and bicyclists. There is also a proposed Class III Bike Route shown in the San Diego Bicycle Master Plan throughout the Park.

Bicycle route access would continue to occur through Plaza de Panama, El Prado, Plaza de California, the Mall, and Pan American Road East.

BT-32 The project was designed to conform to ADA standards, and the proposed design has been reviewed and vetted with the Mayor's Committee on Disability.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

- 1) The Alcazar parking lot has been reconfigured to require the disabled to cross the Centennial Road immediately after the cars come around a tight turn. The Project states that these will be slightly raised cross-walks which would result effectively in speed bumps. The unaddressed issue in the DEIR is that the disabled parking spaces are the only parking spaces that are forced to cross Centennial Road. This would raise the potential concern of discrimination against the disabled. This should be addressed in the DEIR. Despite all of the money that is being spent on this project to eliminate vehicle/ pedestrian conflicts, this potentially significant vehicle/ pedestrian impact is a new creation of the Project.

Alternative:

Reconfiguration of the Alcazar parking lot to provide for disabled Parking in close proximity to the Plaza de Panama. Eliminate the Centennial Bridge and Centennial Road and eliminate the potentially significant handicap access impact.

BT-33

Land Use:

1. Isn't the elimination of the accessibility of viewing the park including but not limited to the Museum of Man and the Plaza de California, the Prado, the Plaza de Panama and its surrounding buildings, the Esplanade and Organ Pavilion from touring vehicles a significant land use issue with respect to accessibility to the park. This applies to tourists with limited time constraints or even members of the public who benefit from a leisurely drive through the park which adds enrichment to their daily life. This is not addressed in the DEIR. The Project treats the vehicle as a necessary evil that should be buried in tunnels and between retaining walls with almost no experience of the park.

BT-34

Land Form:

1. The DEIR identifies the significant immitigable land form impacts of Gold Gulch "c. Visual Effects and Neighborhood Character - Issue 3: Landform Alteration: Therefore, impacts associated with landform alteration are significant and immitigable for this alternative and greater than the project." The issue is with the claim that the impacts are "greater than the Proposed Project". The Proposed Project would be within a current parking lot area, but it would significantly modify the landform. It is down played in the DEIR, but significant landform alterations on the east to create man-made canyon with retaining walls for natural ventilation and access and on the south side of the structure to screen the height of the structure above President's Way would be visible from the vehicles on Centennial Road and Presidents Way at several locations. Man made slopes at a ratio of 2.5 to 1 and as high as 22 feet would be created. Also, vehicles would enter a 170 foot long "tunnel" under the roof top park created between retaining walls and the parking structure on the trip through the park. Further the land form impacts of the retaining walls and slope banks to build Centennial Road would have significant immitigable impacts along Palm Canyon. These types of impacts would be as significant, if not more so, than the landform impacts from the Gold Gulch Alternative.

11

BT-33 See response to comment BT-21.

BT-34 The analysis of landform alteration was conducted pursuant to the City's 2011 Significance Determination Thresholds, which pertain to natural landforms and environmentally sensitive slopes. As disclosed in Section 4.3 Issue 3, the project would result in impacts to 0.12 acre of steep natural slopes as defined by the ESL. The majority of the grading and excavation necessitated by the project would occur in previously disturbed areas, thereby little impact to natural landforms would occur.

The Gold Gulch alternative would result in impacts to natural slopes within Gold Gulch Canyon, the majority of which was previously undisturbed by grading (although developed with the Gold Gulch Old West Mining Town in 1935). Therefore, the conclusion regarding the relative magnitude of impacts is valid.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

Traffic and Safety:

BT-35

1. The DEIR states: "Currently, the Plaza de Panama experiences significant pedestrian/vehicular conflicts. According to the TIA, conflicts are defined as locations where vehicles and pedestrian paths cross. The more conflict points the more potential for incidents. The conflicts of concern are primarily located where pedestrian walkways cross the roadway areas (see Figure 4.4-4). **This situation can slow traffic flow and result in a potential safety hazard.**"

Comment: This is a park road that is intended "to minimize through traffic" (Master Plan Goal). Doesn't slowing traffic down accomplish that? How is the conclusion drawn that slowing traffic down results in a potential safety hazard. Slowing traffic down should make it safer. Pedestrian crossings occur throughout the city with traffic flowing at a much higher speed. New urbanist's "main street" planning concepts for commercial nodes demonstrate that even higher volumes of traffic and pedestrian usage can co-exist safely. How many pedestrian vehicle accidents have there been in the past 94 years since vehicles have been allowed through the park?

BT-36

2. The Traffic Impact Analysis (TIA) appears to use traffic standards such as Level of Service (LOS) for standard street operations. This is a park road intended for slower traffic, who are touring the park by car and looking at the historic park structures.

BT-37

3. What methodology is used to determine the acceptable level of service for pedestrians crossing a narrow park road (32' at the widest in the park versus a city standard of 40') that has reduced speeds of 15 miles per hour rather than 25 or 30 miles per hour? What is the difference if pedestrians are crossing only one lane of traffic versus two lanes of traffic? Clearly, typical standard street intersection analysis should not be used.

BT-38

4. The traffic study indicates that the Half Plaza (Alt Biv) "would result in one significant immitigable traffic capacity impact to internal intersection in both 2015 and 2030 attributable to queuing in the Plaza de Panama . . ." First this was based on drop-off being retained in the Plaza de Panama. The significant queuing occurs on the northbound side by the drop-off. Would this be a significant impact if the drop-off and disabled parking were relocated to the Alcazar parking? Again is the intersection analysis being done based on standard street intersection methodology or is it adapted to a slower pace park setting.

BT-39

5. The DEIR should address the safety aspects of the Centennial Road as it comes around the tight radius of Centennial Bridge then stopping at the ADA cross walk and then as it leaves the Alcazar parking lot there is a series of tight serpentine curves through the tunnel and ending at President's Way with no stop signs (even at the entrance to the parking structure. It is easy to imagine some will try to speed through this area despite the curves. Combine this with bicycles sharing the same 14' wide lanes which narrow down at the parking entrances, there is reason to be concern about safety. The loading for Mingei is right at the curve with trucks backing in. The irregular shape intersection of the at the south east end of the parking structure with the berms and slopes should be addressed. It is reasonable to question whether the existing relatively straight or gently curving roadway with pedestrian crossings and the potential for separate bike lanes isn't safer than the proposed serpentine roadway. This is especially true is 2030 when the Centennial Bridge and Centennial Road will fail capacity. The DEIR identifies that this failure

12

BT-35 Comment noted.

BT-36 The roads within the Park were analyzed as Park Roads and considered to have similar capacities as Collector Streets. The level of service results were based on maximum capacity of 10,000 ADTs similar to Collector Streets per the City's Road Standards. See TIA (Appendix D-1) for more information.

BT-37 Pedestrian crossing safety was not evaluated in terms of LOS; however, there are guidelines for designing safer crossings such as marked crosswalks, clear visibility, advance warnings and signage for each appropriate speed zones. One-way direction of vehicular travel also minimizes pedestrian exposure.

BT-38 The project provides pick-up/drop-off, valet operations and ADA parking within the Alcazar parking lot. Under the Half Plaza Alternative, there is no vehicular access to the Alcazar parking lot.

BT-39 The failure in capacity in year 2030 on the Centennial Bridge is not project related, as it is the same amount of traffic that would exist in No Project or similar two-way alternative conditions. Centennial Road segment would not fail in capacity in year 2030. The project would fully mitigate traffic impacts, as indicated in Section 4.4.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

is not the result of the Project, but why should a Project with significant unavoidable impacts be approved when it is anticipate being over capacity in 2030?

Conclusion:

A tremendous effort has gone into this project and the DEIR. However, I believe that there are serious concerns, misstatements in the DEIR, and additional analysis in the DEIR needed. Even without this additional analysis, there is sufficient information in the DEIR to seriously question the justification to make overriding findings to approve this Project which has significant unavoidable impacts. I look for to reviewing the responses to comments from my comments and the other comments that are being submitted.

Respectfully,



John C. Ziebarth, AIA, LEED AP

BT-40 Comment noted.

LETTER

RESPONSE

Letter BU

From: [Jim Ziegler](#)
To: [DSD EAS](#)
Subject: Balboa Park Environmental Impact
Date: Wednesday, March 07, 2012 6:00:20 PM

BU-1

As a frequent visitor to Balboa Park, I enthusiastically support the vision to reroute auto traffic using the proposed bypass bridge and undergrounding the parking lot behind the organ pavilion. We are fortunate to have private donors willing to support so much of the costs and I also support initiating paid parking in the new garage to help with the costs. Sincerely, James Ziegler, 4756 Panorama Drive, San Diego, CA 92116

BU-1 Comment noted.

LETTER

RESPONSE

Letter BV

From: [Frances O'Neill Zimmerman](#)
 To: [RSD EAS](#)
 Subject: Project 233958 Balboa Park Plaza de Panama
 Date: Tuesday, March 20, 2012 10:29:57 PM

Ladies and Gentlemen;

BV-1

I just signed the following petition addressed to: Heritage Architecture & Planning; Balboa Park Cultural Partnership; Elizabeth Shearer-Nguyen, City of San Diego Development Services; City of San Diego Planning Commission; Sherri Lightner, City of San Diego District 1 Councilmember; Kevin Faulconer, City of San Diego District 2 Council President Pro Tem; Todd Gloria, City of San Diego District 3 Councilmember; Tony Young, City of San Diego District 4 Councilmember and Council President; Carl DeMaio, City of San Diego District 5 Councilmember; Lorie Zapf, City of San Diego District 6 Councilmember; Marti Emerald, City of San Diego District 7 Councilmember; David Alvarez, City of San Diego District 8 Councilmember; Jerry Sanders, Mayor of San Diego; and the Plaza de Panama Committee.

A We, the undersigned, support the No Project (No Development/Existing Conditions)
 B Alternative (Alt 1) for Plaza de Panama in Balboa Park. We don't want trees removed
 C from the Central Mesa, "impacts to nesting raptors and species covered under the
 D Migratory Bird Treaty Act," "project grading" "potentially" destructive to "fossil
 E remains," encroachment into "Environmentally Sensitive Land" "steep slopes,"
 "fencing or other City approved barriers along the MHPA boundaries," the
 Centennial Bridge, the Centennial Road and its "retaining walls," or other "significant
 and unmitigable" "impacts".

F We restate that the Torrey Pine (*Pinus torreyana*) is IUCN-listed as "vulnerable," and
 G is the species of at least one of the trees that "would be removed or relocated." We
 didn't figure up to "165 trees would be removed." We were frustrated that the
 "Cabrillo Bridge Closure Alternative" was "rejected".

H The city confused us with the MOU language concerning the project agreed terms,
 so much that a Superior Court judge had to challenge it. The "Southern Boarders
 Archery Association" opposes the project. The Committee of One Hundred didn't like
 the Centennial Bridge. The North Park Planning Committee issued objections to the
 project. Several of your constituents who know the Plaza de Panama oppose it.

I We want you to deny this project. There will be traffic and parking problems if the
 park closes El Prado, the Plaza de Panama, and the Pan American Promenade to
 non-emergency vehicles, but there is public transit, and the trees and other natural
 assets must be spared. I am relieved that the city has an environmental
 review protocol and this report was drafted to tell us the consequences. Thank you
 for your time.

Sincerely,

BV-1 A See response to comment AR-2.

B The project would employ mitigation and impacts to
 paleontological resources would be less than significant as
 discussed in detail in Section 4.13.

C Project grading would encroach into 0.121 acre of ESL steep
 slopes (0.79 percent of the total project area), as discussed in
 Section 4.3.4. This encroachment would constitute a less than
 significant landform alteration impact.

D Mitigation Measure LU-1 calls for fencing to be placed adjacent
 to the MHPA boundary near the Arizona Street Landfill.

E Significant and unmitigable impacts are disclosed for all project
 components and are summarized in Section 5.

F Comment noted.

G This comment states that a Cabrillo Bridge Closure Alternative
 was rejected. The EIR fully analyzes four variations of a
 Cabrillo Bridge Closure Alternative (Alternatives 3A through 3D)
 and although none were chosen as the Environmentally
 Superior Alternative, they were not rejected.

H Comment noted.

I Comment noted.

LETTER

RESPONSE

Below is a list of people who signed change.org petition:


Charles Adair, San Diego
 C.J. Anderson-Wu, Taipei, Taiwan
 Wendy Tinsley Becker, San Diego, California
 Kathleen Blavatt, San Diego, California
 Ernestine Bonn, San Diego, California
 Dionne Carlson, San Diego, California
 Glen Carlson, San Diego, California
 Ashley Christensen, Escondido, California
 David Cohen, United State Minor Outlying Islands
 Alana Coons, San Diego, California
 Bruce Coons, San Diego, California
 Bret Daguio, San Diego, California
 Roberto de Biase, San Diego, California
 John Eisenhart, San Diego, California
 Susan Floyd, San Diego, California
 Alan Francisco
 Ann Garwood, San Diego, California
 Jesus Gerardo, Kingsburg, California
 James Gilhooly, San Diego, California
 Igor Goldking, Liverpool, United Kingdom
 Richard Gorin, San Diego, California
 Ruth Hayeard
 Amy Hoffman, San Diego, California
 Ann Jarmusch, Sedona, Arizona
 Marita Johnson, San Diego, California
 Irma Jones, San Diego, California
 Welton Jones, San Diego, California
 David Krimmel, San Diego, California
 John Lomac, San Diego, California
 Lukas Martinelli, San Diego, California
 Adrienne Martinez, San Diego, California
 Gregory May, San Diego, California
 Ronald May, La Jolla, California
 Vonn Marie May, Encinitas, California
 Patrick McArron, San Diego, California
 Pamela Miller, San Diego, California
 Nancy Moors, San Diego, California
 Geoff Page
 Deborah Pettry, San Diego, California
 Julia Quinn, San Diego, California
 David Raines, San Diego, California
 Richard Ross
 Nancy Sands, Brooklyn, New York
 Doug Scott, San Diego, California
 Dan Soderberg, San Diego, California
 Ione Stiegler, La Jolla, California
 David Swarens, San Diego, California
 Ian Trowbridge, San Diego, California
 Elizabeth Weems, San Diego, California
 Linda Wilson, San Diego, California
 Sandra Wilson, Silverdale, Washington
 Frances O'Neill Zimmerman, La Jolla, California

LETTER

RESPONSE

BV-2 I am opposed to the proposed project. I support re-establishing a pedestrian plaza but not at the expense and level of impact resultant from the means to achieve the end. Remove the existing parking spaces and disallow motorists from driving across the Cabrillo Bridge and through the former plaza. Remove the existing spaces in front of the Art Museum and eliminate Valet Parking for the Prado Restaurant and other nearby occupants. Install a new plaza pursuant to historic plan and materials. The bypass bridge and parking structure are not necessary components for a successful pedestrian plaza. The private and public funds would be better spent on improving the existing park shuttle service in and around Balboa Park.

Wendy Tinsley Becker
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

BV-2 Comment noted.

LETTER

RESPONSE

BV-3 It is short term planning with major changes just to remove cars from Plaza de Panama while bringing in more cars to be housed in a 798 space parking structure. The park may lose its National Landmark designation as a result of the proposed changes.

Ernestine Bonn
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-park-cambia-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

BV-3 Comment noted. See response to comment F-9.

LETTER

RESPONSE

BV-4 Close the bridge, remove cars from central areas (except emergency/maintenance vehicles), build the parking garage at Inspiration Point. Use money saved from NOT building bypass bridge for tram system.

Ruth Hayeard
La Jolla, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-park-cambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#)

BV-4 Comment noted. This Inspiration Pointe Parking Structure Alternative is addressed in Section 9.3.3D.

LETTER

RESPONSE

BV-5

I am also concerned about the visual impacts to the park and the scenic, historic Cabrillo freeway (163). The proposed changes to the historic bridge, buildings, courtyards, and landscapes of the central mesa of Balboa Park, both visually and experientially, also are unacceptable.

Amy Hoffman
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

BV-5 The EIR identifies significant and unmitigable impacts. Pursuant to CEQA Guidelines Sections 15091 and 15093, Findings and a Statement of Overriding Considerations have been prepared for the consideration of the decision making body (City Council) and left to its discretion to determine whether to approve or deny the project or any of the alternatives, or combination thereof.

LETTER

BV-6

This project would mar one of San Diego's the most iconic structures. Even a casual observer would recognize that this beautiful bridge had been modified from it's original form and function. There are other better solutions than carving into this historic fabric.

Welton Jones
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

RESPONSE

BV-6

As required pursuant to CEQA Guidelines Section 15126.6(a) these alternatives were selected to provide a reasonable range of possible project designs which could feasibly attain most of the basic objectives of the project but avoid or substantially lessen any significant effects of the project.


LETTER

RESPONSE

BV-7

There is no reason for this. It is one rich man's vanity project being forced on the rest of us. Instead of the city spending the money for the bypass why not just spend the money on the eastern parking structure? Leave the Park intact. Close Cabrillo bridge and central plaza to all but pedestrian traffic if necessary. That would accomplish the same goals while preserving the park.

Mary Laiuppa
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

BV-7 See response to comment BV-11.

LETTER

RESPONSE

From: [Isabella Nicolaides](#)
 To: [DSD_EAS](#)
 Subject: Balboa Park Plaza de Panama Project No. 233958
 Date: Friday, February 10, 2012 10:49:29 PM

Greetings,

BV-8

I just signed the following petition addressed to: Heritage Architecture & Planning; Balboa Park Cultural Partnership; Elizabeth Shearer-Nguyen, City of San Diego Development Services; Kevin Faulconer, Councilmember; Todd Gloria, Councilmember; and Jerry Sanders, Mayor of San Diego.

 We, the undersigned, do not support the removal of the black acacia trees or the "City Christmas Tree," the proposed "bypass road and bridge," the "Palm Walk," or the "tram parkway" in Balboa Park's Plaza de Panama. No tree needs to be removed or disturbed. We don't need to construct anything across the eucalyptus grove, Palm Canyon, or other green space and disturb ecological habitat. No significant visitor controversy demands these modifications. Members of our community, including the North Park Planning Committee, don't want these changes.


<http://www.sandiego.gov/planning/community/profiles/greaternorthpark/pdf/minutes/11febminutes.pdf>

Plaza de Panama's and all of Balboa Park's historic beauty doesn't depend on tree felling or ecological disruption. San Diego and its surrounding communities have seen countless trees brutally razed, including the torrey pine (*Pinus torreyana*), which is listed by the International Union for Conservation of Nature and Natural Resources as "vulnerable" (<http://www.iucnredlist.org/>), to erect campuses, resorts, and golf courses like the Torrey Pines Golf Course.

We can change the plan to conserve the trees and the ecosystem of Plaza de Panama. The project would still preserve the plaza's natural and historic beauty and perhaps gain praise for doing it. The plan can keep the sustainable modifications, and Civitas would set a standard for more sustainable development projects. We would preserve the park's nature and still captivate the ongoing international tourism that visits. Thank you for your time.

 Sincerely,

Isabella Nicolaides
 Coatesville, Pennsylvania

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

BV-8 Comment noted.


LETTER

RESPONSE

BV-9

Because I disagree with disfiguring the park in this manner.

Geoff Page
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#) 

BV-9 Comment noted.

LETTER

RESPONSE

BV-10 Preservation of Landscape along with Structures and Spatial relationships. In no way does the proposed bypass bridge comply.

Richard Ross
San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at <http://www.change.org/petitions/san-diego-is-not-protecting-valuable-vegetation-in-historic-balboa-parkcambie-el-plan-para-la-plaza-de-panam>. To respond, [click here](#)



BV-10 As disclosed in Section 4.2, the Centennial Bridge would not comply with SOI Rehabilitation Standards 2 and 9. This has been identified as a significant unmitigable impact.

LETTER

RESPONSE

THIS PAGE IS INTENTIONALLY BLANK.