

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 AA

DuaneMorris*

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March 22, 2012

VIA E-MAIL: 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: **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 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.

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.

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 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.

Elizabeth Shearer-Nguyen
March 22, 2012
Page 3

DuaneMorris

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.

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?**

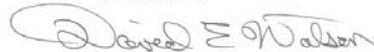
AA-14 12. The DEIR identifies the 2004 Jones and Jones Land Use, Circulation and Parking Study Alternative as rejected because of greater environmental (traffic, air quality, noise, greenhouse gases etc.). **Was there an assessment conducted to specifically determine the level of environmental impacts?**

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 AB

From: [George Adams](#)
To: [DSD EAS](#)
Cc: [info@plazadepanama.org](#); [herrilshiner@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMato, Councilmember Carl](#); [Zarif, 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 AC

From: [George Adams](#)
To: [Lichtner, Councilmember Sherri](#); [Eaulonger, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMaio, Councilmember Carl](#); [Zarf, Council Member Lorie](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); 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 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 Alcalá
- 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 Heimbürg, 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 Laverty, 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: OcaBooks@aol.com
To: [DSD_EAS](#)
Cc: info@plazadepanama.org; [Lichtner, Councilmember Shari](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Younis, Anthony](#); [DeMaio, Councilmember Carl](#); [Zanf, Council Member Loris](#); [Emerald, Councilmember Marti](#); [Alvarez, Council Member David](#); [Sanders, Jerry](#); booc@booc.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](#); [hertlin@nrcr@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMato, Councilmember Carl](#); [Zarif, 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

AD-3

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,

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](#); [hertlin@nrcr@sandiego.gov](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony](#); [DeMato, Councilmember Carl](#); [Zarif, 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: DSD EAS
Cc: info@plazadepanama.org; herril@htrn@sandiego.gov; [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young, Anthony DeMato, 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](#); [berlichtner@sandiego.gov](#); [Faulconer_Council_Member_Kevin](#); [Councilmember_Todd_Gloria](#); [Young_Anthony_DeMaio_Councilmember_Carl](#); [Zarf_Council_Member_Loris](#); [Emerald_Councilmember_Marti](#); [Alvarez_Council_Member_Davis](#); [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: [DSD_EAS](#)
Cc: ["info@plazadepanama.org"](#); ["herilichtner@sandiego.org"](#); [Faulconer, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Younis, 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

AD-9

Afternoon,

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](mailto:Chris.Ruiz)
To: DSD_EAS
Cc: info@plazadepanama.org; herrilobner@sandiego.gov; [Eulsoner, Council Member Kevin](#); [Councilmember Todd Gloria](#); [Youno, 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 2:09:30 PM

Dear Ms. Shearer-Nguyen:

AD-10

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 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 Sherr; 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 AF

ARTHUR B. BALLANTYNE
REAL PROPERTY RESEARCH CONSULTANT

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

March 6, 2012

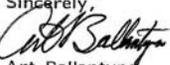
Mrs. E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
Fax 619/446-5499

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 tranquility 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.

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

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.

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, 1915, by the following vote, to-wit:

AYES—Councilmen Adams, 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, 1915.

President of the City of San Diego, California.

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, 1915.

City Clerk of the City of San Diego, California.

Deputy.

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 said City of San Diego.

Deputy.

I HEREBY APPROVE the foregoing ordinance this 6th day of January, 1915.

[SEAL] Attest: William H. Sprague
City Clerk of the City of San Diego, California.

By: W. E. Bartlett
Deputy.

Charles F. O'Neill
Mayor of the City of San Diego, California.

Deputy.

15-21-30-1000 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

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.

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, ...".</i> 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.</p> <p>AG-6 4. <i>"...and would result in additional potentially significant unmitigable impacts...".</i> 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.</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...".</i> 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.</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>
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LETTER

RESPONSE

<p>AG-10 <i>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.</i></p> <p>AG-11 9. <i>"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.</i></p> <p>AG-12 10. <i>"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.</i></p> <p style="text-align: center;">3</p>	<p>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.</p> <p>See response to comment AG-5.</p> <p>AG-11 It is acknowledged that the Gold Gulch Alternative would only have an increased distance of 132 feet.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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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.

AG-14

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.

<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-19 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>AG-20 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>
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LETTER

RESPONSE

<p>AG-21</p>	<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>
<p>AG-22</p>	<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>
<p>AG-23</p>	<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>
<p>AG-24</p>	<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>

LETTER

RESPONSE

<p>AG-25</p> <p>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-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</p> <p>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-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</p> <p>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-27 Comment noted.</p>
<p>AG-28</p> <p>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-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</p> <p>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-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>

Attachment A



TRANSPORTATION LLC
P.O. Box 1590
Lakeside, Ca. 92040
Phone: 619-596-2888 Fax:619-596-2228

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.

A handwritten signature in blue ink that reads "Bruce Denny".

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

LETTER

RESPONSE

<p>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.</p> <p>AG-30 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>1. <i>"The parking structure would be a five-level, 798-stall structure, resulting in a net increase of 273 additional parking spaces."</i> 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.</p> <p>AG-33 2. <i>"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."</i> 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.</p> <p>AG-34 3. <i>"Park Road would have two-way traffic, a bike lane, and walkway."</i> The Park Road proposed in the Gold Gulch Alternative would have a 12 foot</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>AG-33 Comment noted.</p> <p>AG-34 Comment noted.</p>
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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 Puplava, 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.

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.

3) "Several of the trees within Gold Gulch are identified as CMPP "Significant Trees" (Grey Corkwood, *Erythrina plebacarpa*; Sea Urchin *Hakea*, *Hakea petiolaris*; and Coast Live Oak, *Quercus agrifolia*)." In the CMPP the *Erythrina plebacarpa* is listed as a single species that is moveable; the *Hakea petiolaris* is listed as a tree to save (which could only be done by moving, although this is not listed as an option); and the *Quercus agrifolia* are shown to have 25 species, many of which would not be affected, but even so they are also listed as "movable".

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, *ficus radulina*, 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.

5) "Fifteen Sugar Gum, *Eucalyptus cladocalyx*, 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.

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.

d) "d. Transportation/Circulation and Parking
 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

AG-37 (cont.)

3) Comment noted.

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.

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.

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.

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.

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.

LETTER

RESPONSE

<p>AG-40</p> <p>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.</p> <p>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.</p> <p>AG-41</p> <p>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.</p> <p>AG-42</p> <p>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.</p> <p>AG-43</p> <p>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.</p>	<p>AG-40 See response to comments AG-7, AG-15, and AG-16.</p> <p>AG-41 See response to comments AG-16 and AG-39.</p> <p>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.</p> <p>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 <i>A Policy on Geometric Design of Highways and Streets, AASHTO 2011</i>. Similar to the Gold Gulch Alternative, the project would meet the minimum design requirements for the 15 mph speed limit.</p>
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LETTER

RESPONSE

- AG-44 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.
- AG-45 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.
- AG-46 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.

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>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>AG-49 g) <i>“i. Greenhouse Cases – 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.”</i> 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) <i>“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.”</i> 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 <i>“9.3.4A.3 Conclusion Regarding the Gold Gulch Parking Structure Alternative”</i> 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>
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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>
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LETTER

RESPONSE

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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.

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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.

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.

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.

AG-52

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.

I look forward to receiving your reply to my response regarding the DEIR.

Sincerely;

Ricardo Bazan, P.E.
2352-1/2 3rd Avenue
San Diego, CA 92101

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See response to comments AG-1 through AG-3.

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Comment noted.

AG-52 Comment noted.

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

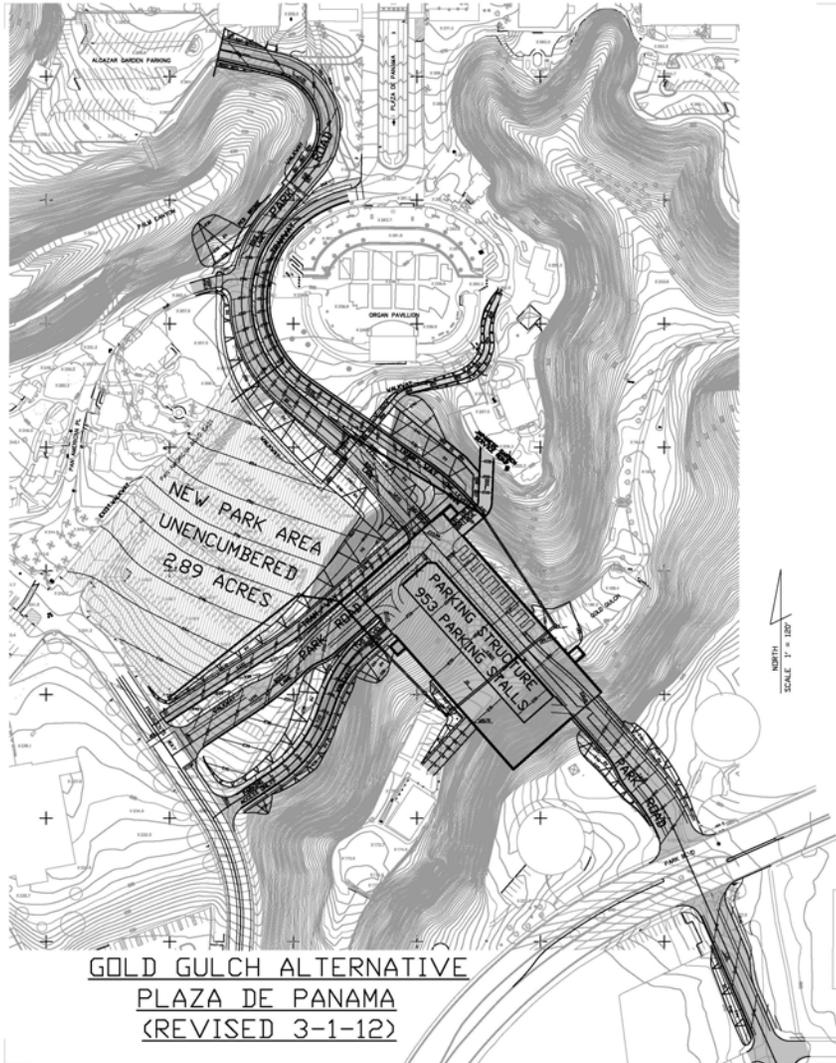
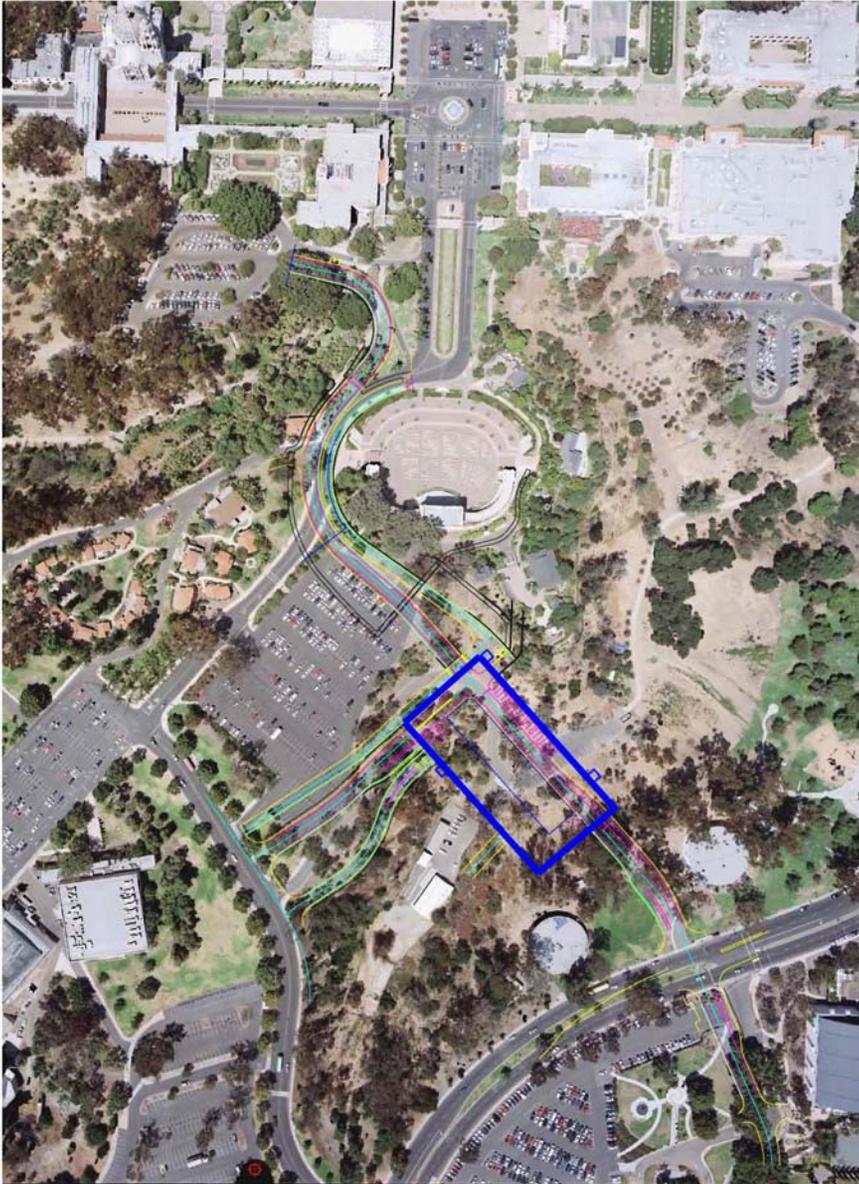


EXHIBIT 2 - AERIAL PHOTO WITH GOLD GULCH ALTERNATIVE
(PHOTO NOT RECTIFIED SO SOME VARIATIONS IN LOCATION ARE SHOWN)



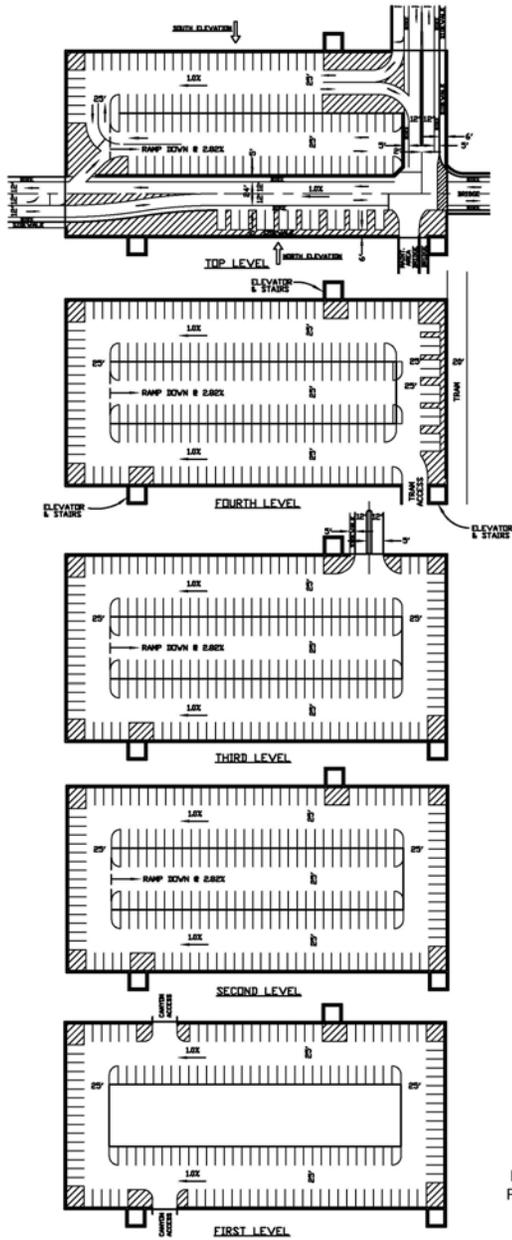
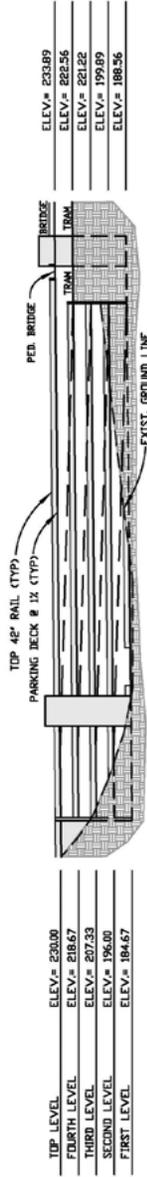


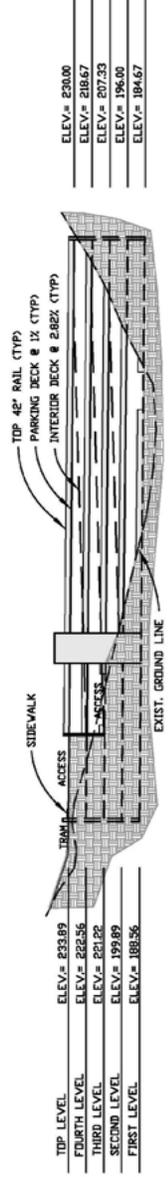
EXHIBIT 3
PLAN VIEWS

BALBOA PARK - GOLD GULCH PARKING STRUCTURE
SCHEME 3s

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



NORTH ELEVATION



SOUTH ELEVATION

BALBOA PARK - GOLD GULCH PARKING STRUCTURE
 SCHEME 3s

953 - 9'x18' & HC SPACES TOTAL SCALE 1" = 50' MAY 23, 2011

EXHIBIT 4

LETTER

RESPONSE

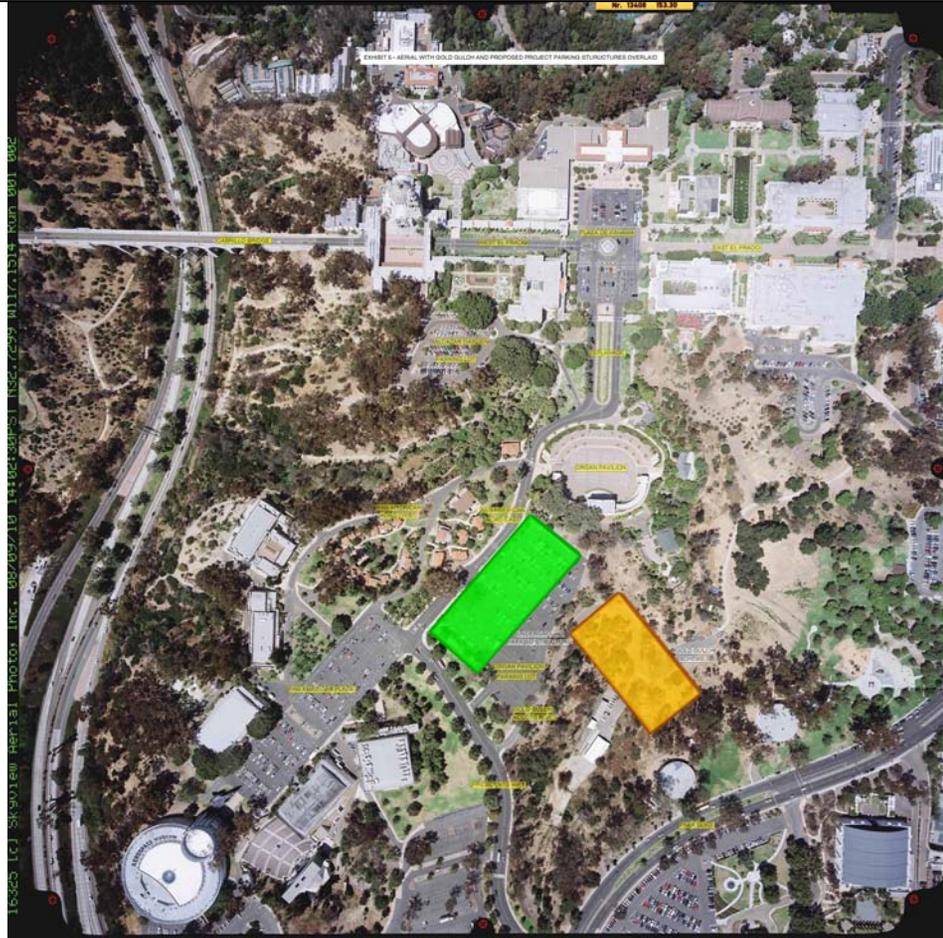
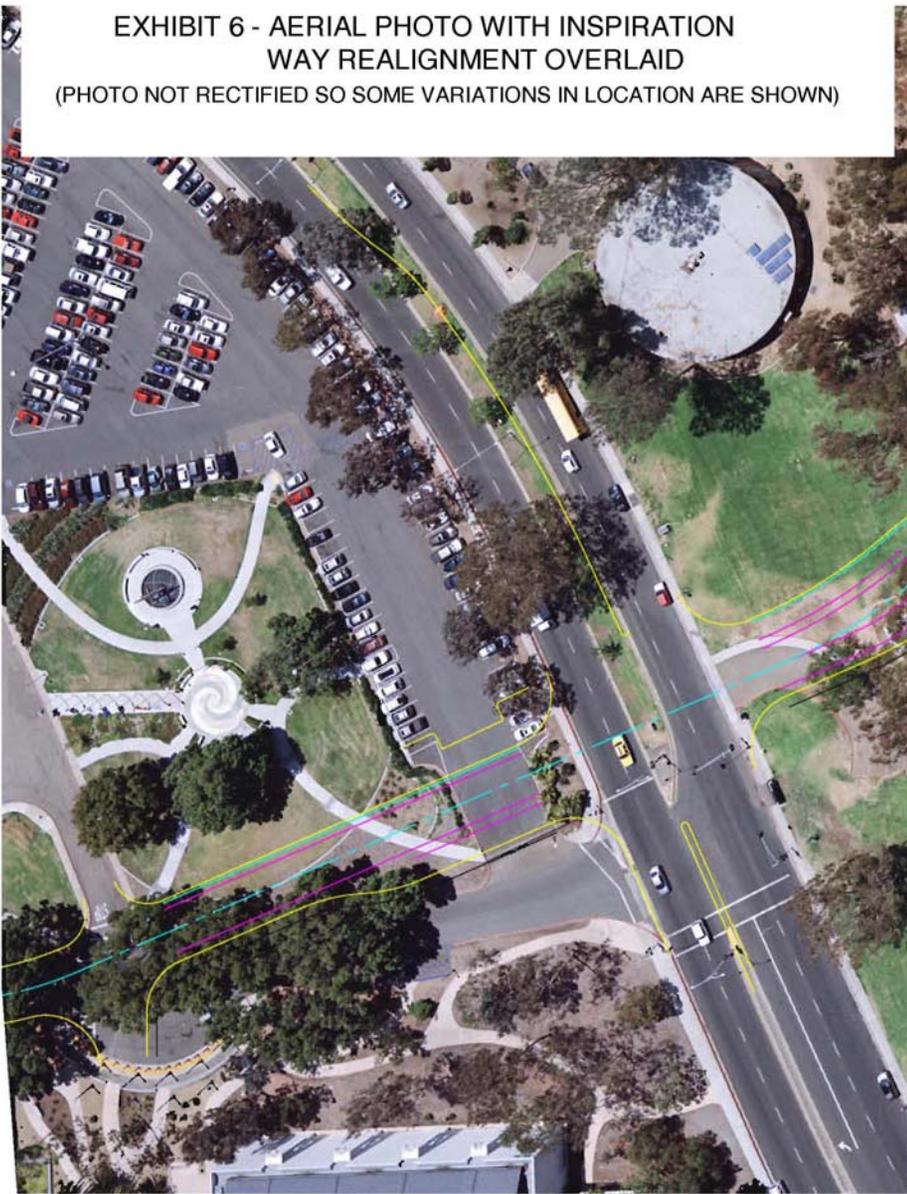
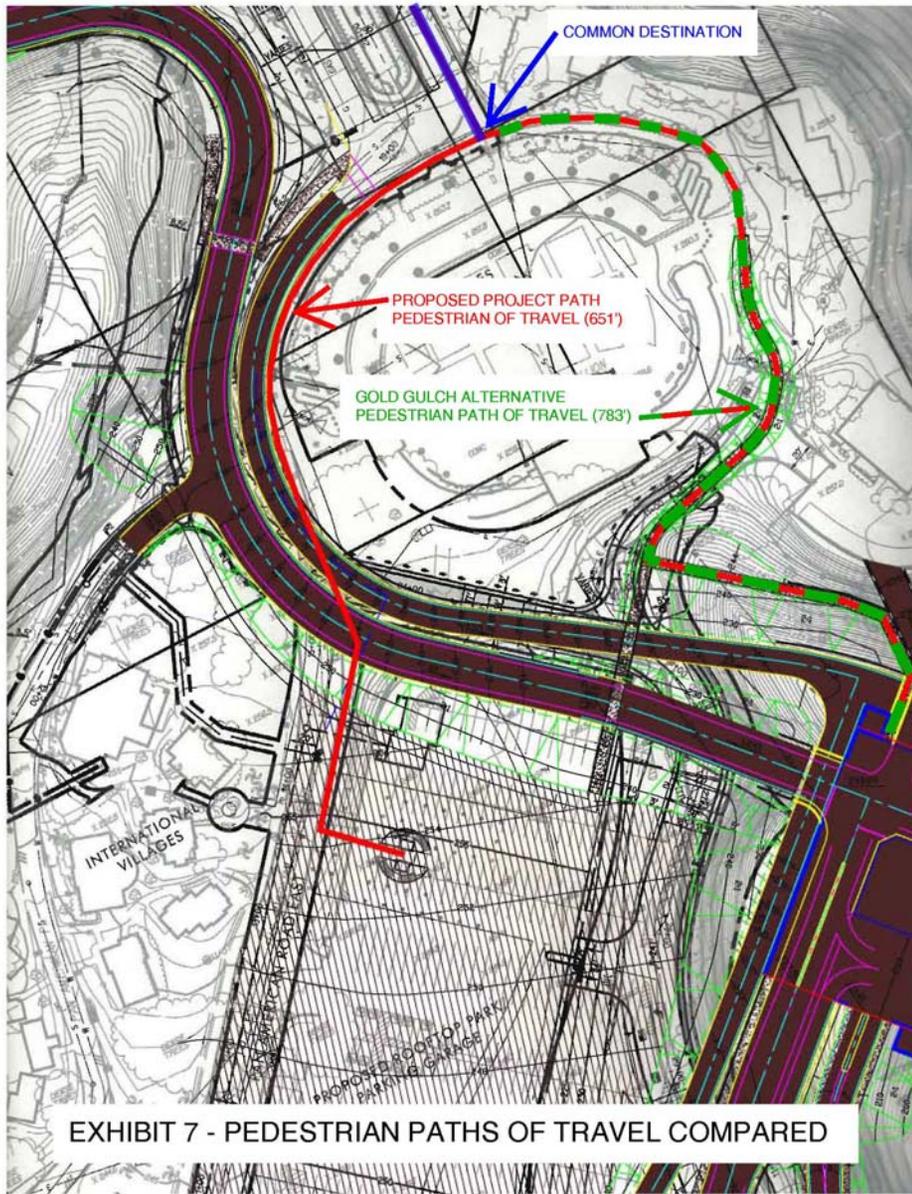
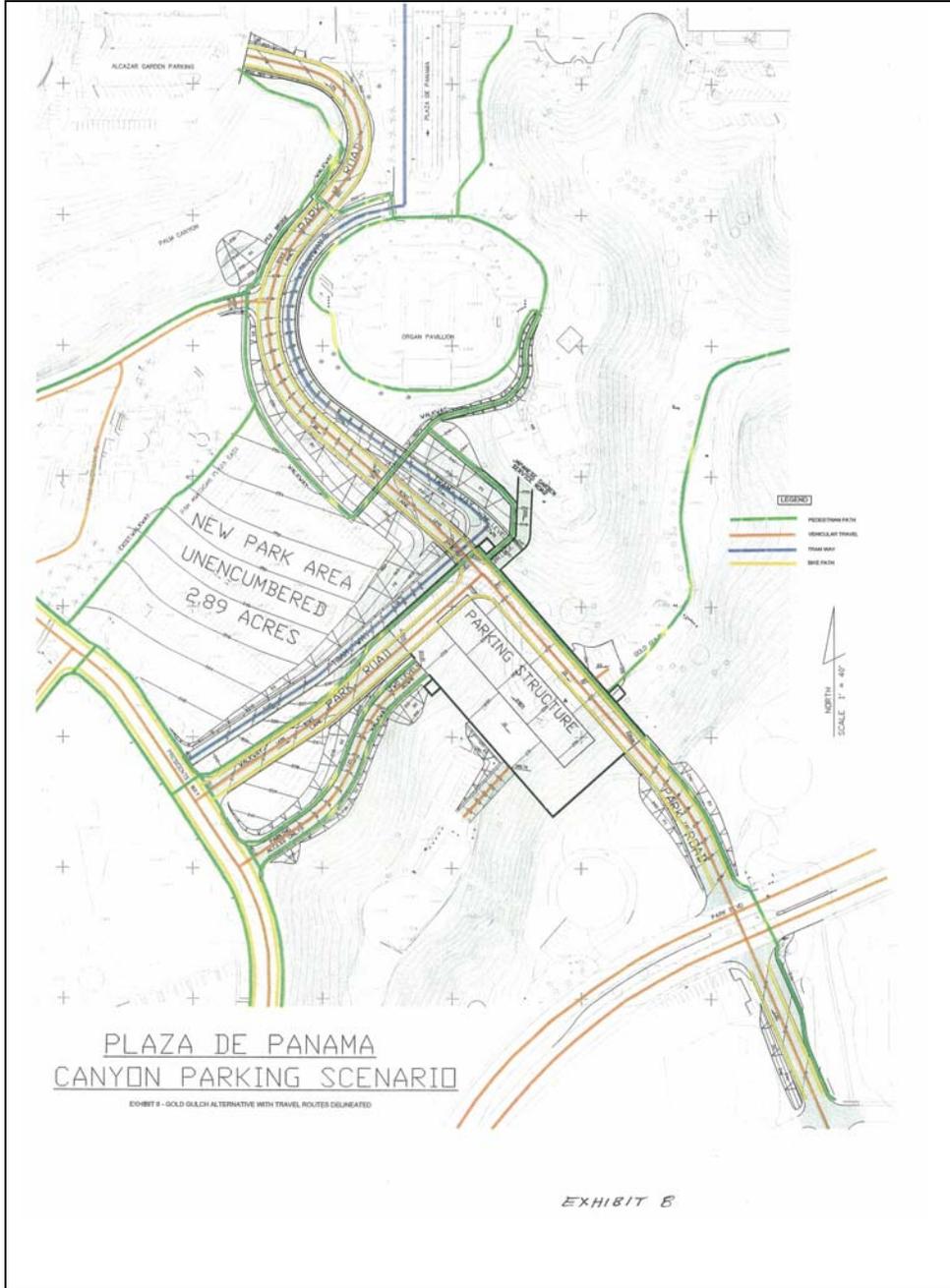


EXHIBIT 6 - AERIAL PHOTO WITH INSPIRATION
WAY REALIGNMENT OVERLAID
(PHOTO NOT RECTIFIED SO SOME VARIATIONS IN LOCATION ARE SHOWN)







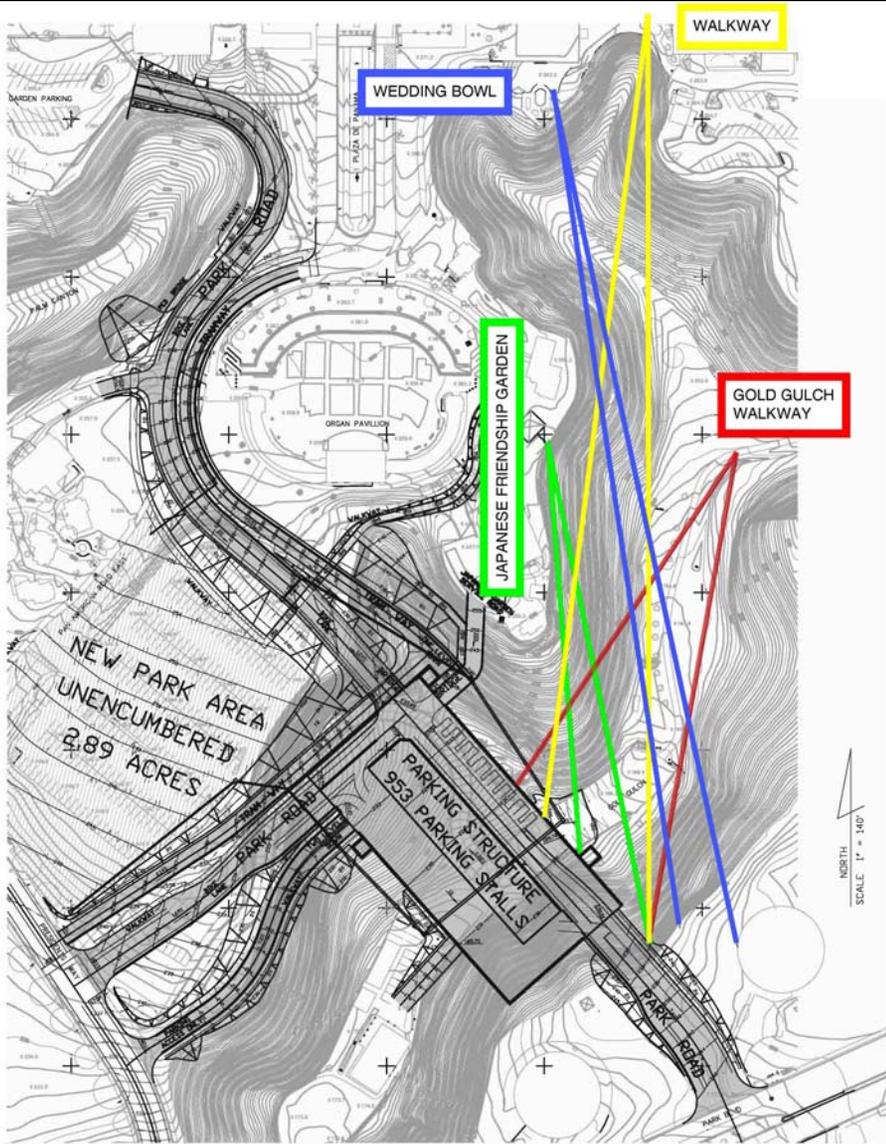


EXHIBIT 10 - SIGHT LINES TO GOLD GULCH PARKING STRUCTURE

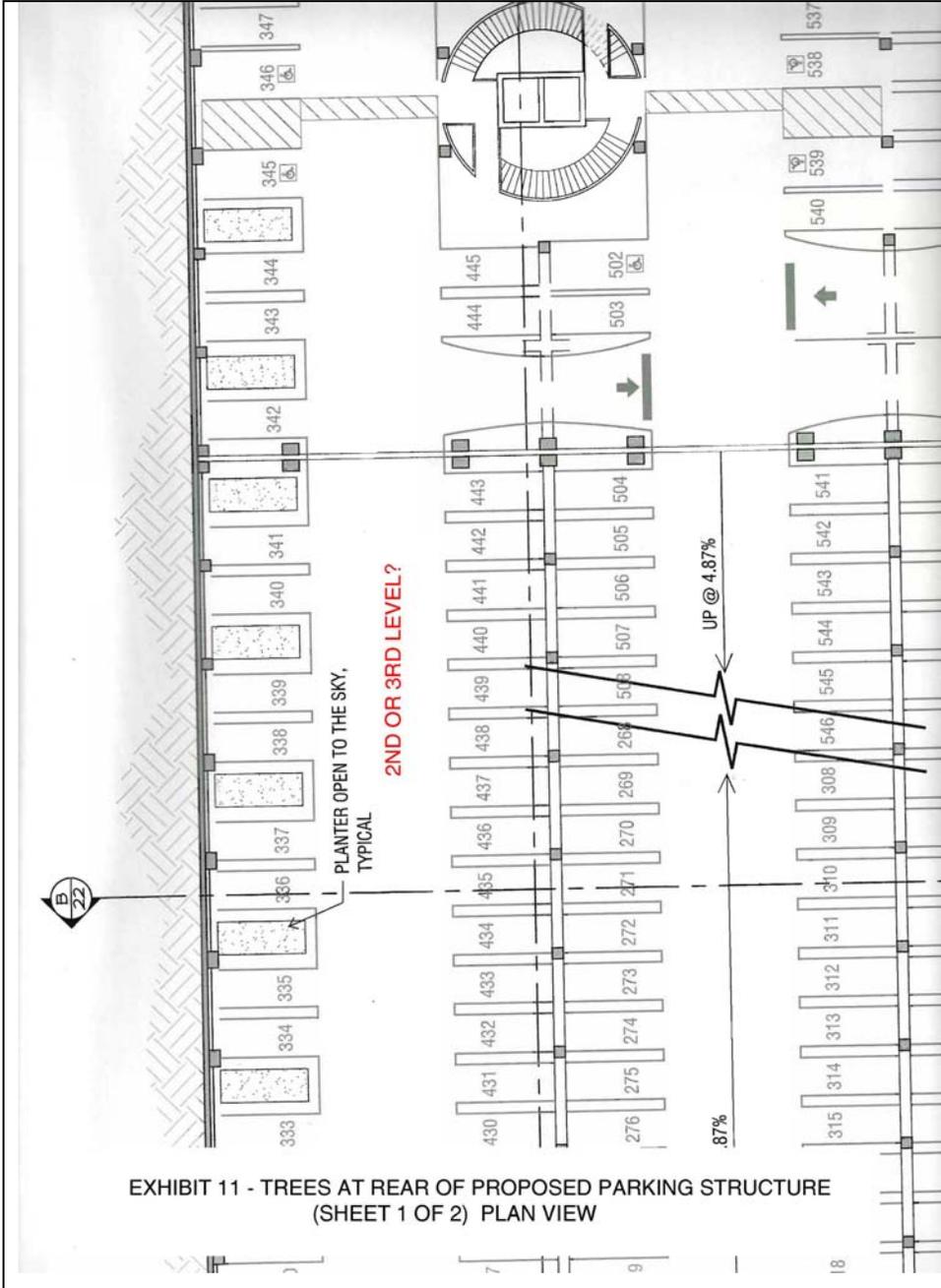


EXHIBIT 11 - TREES AT REAR OF PROPOSED PARKING STRUCTURE
(SHEET 1 OF 2) PLAN VIEW

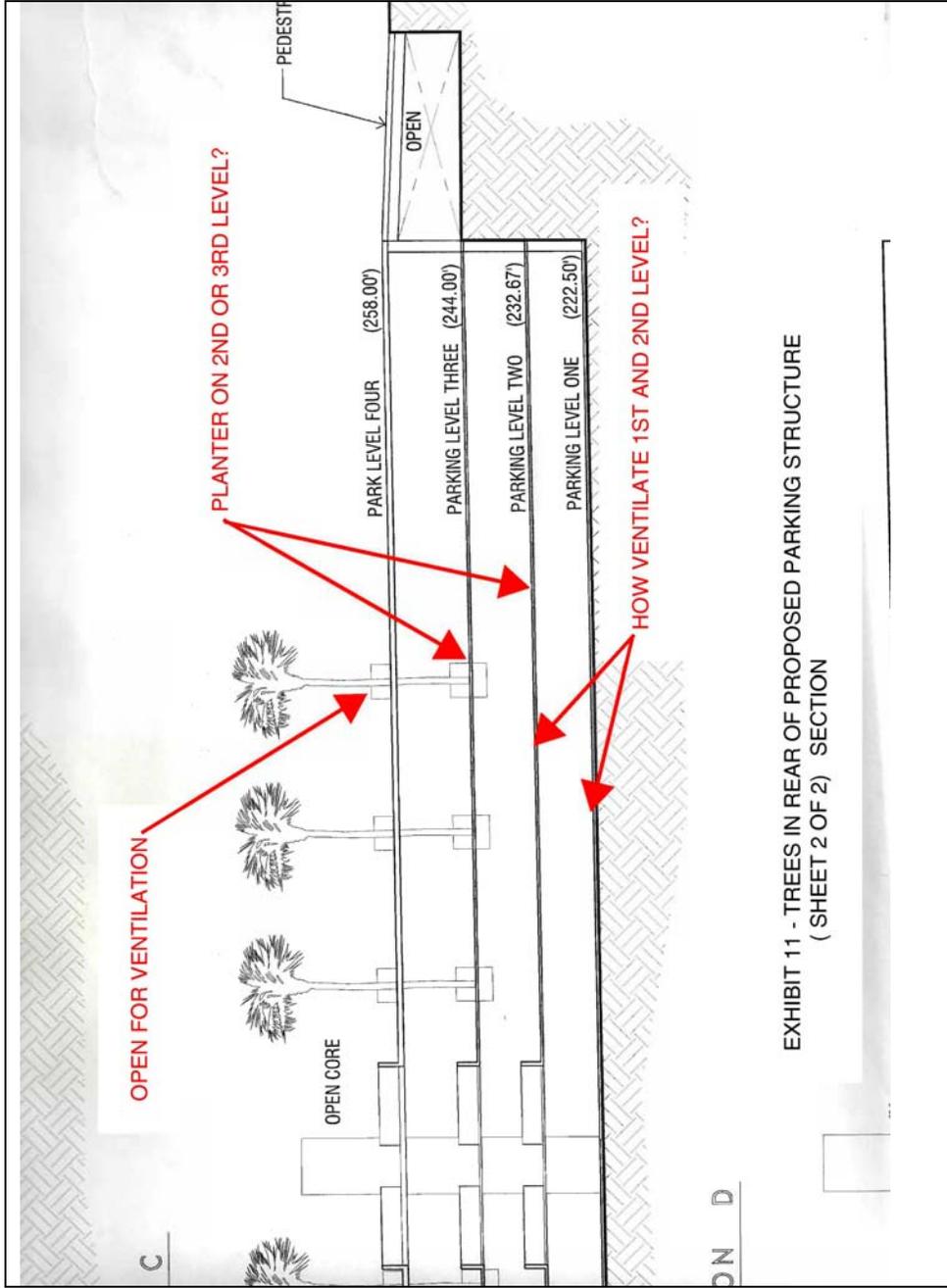


EXHIBIT 11 - TREES IN REAR OF PROPOSED PARKING STRUCTURE
(SHEET 2 OF 2) SECTION

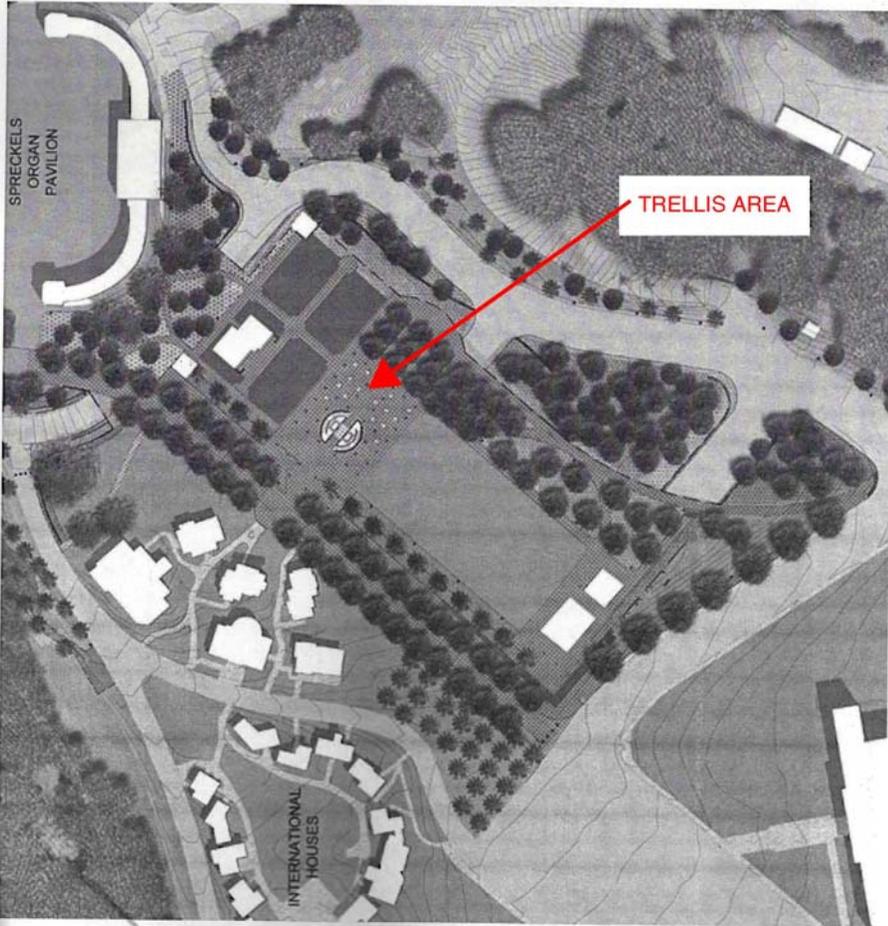


EXHIBIT 12 - TRELLISES WITH SOLAR PANELS ON ROOFTOP PARK
(SHEET 1 OF 3) OVERALL PLAN

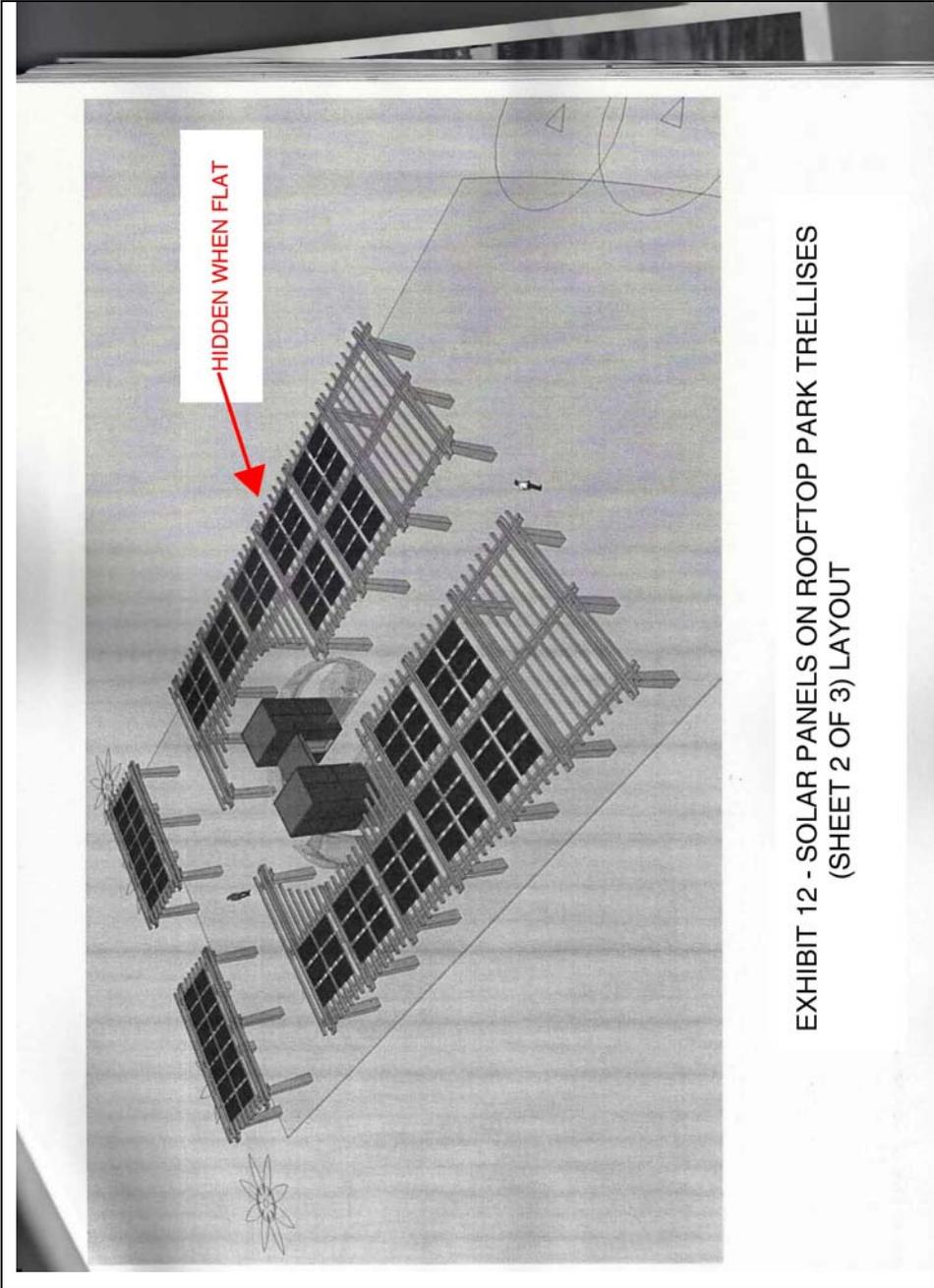
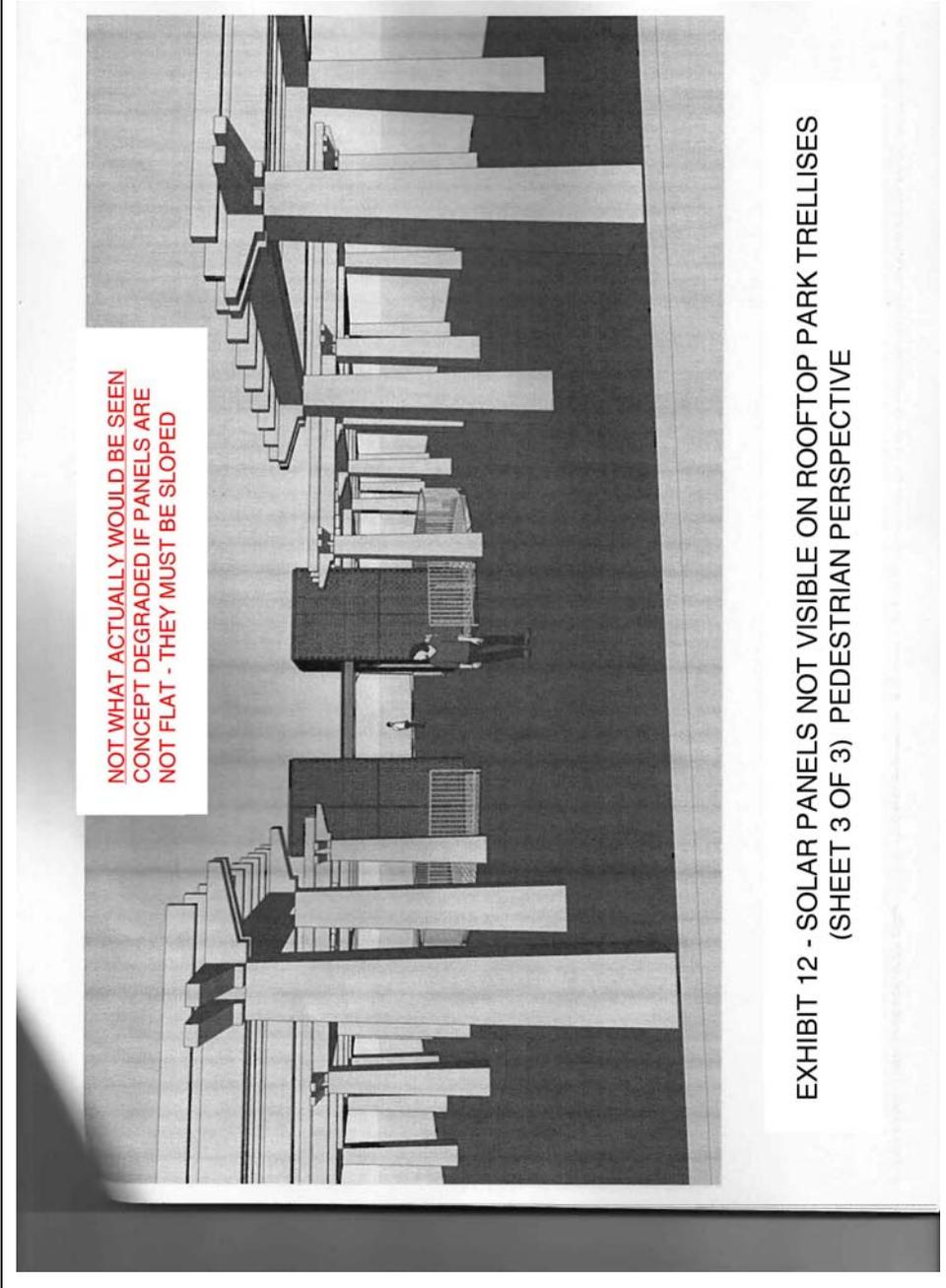
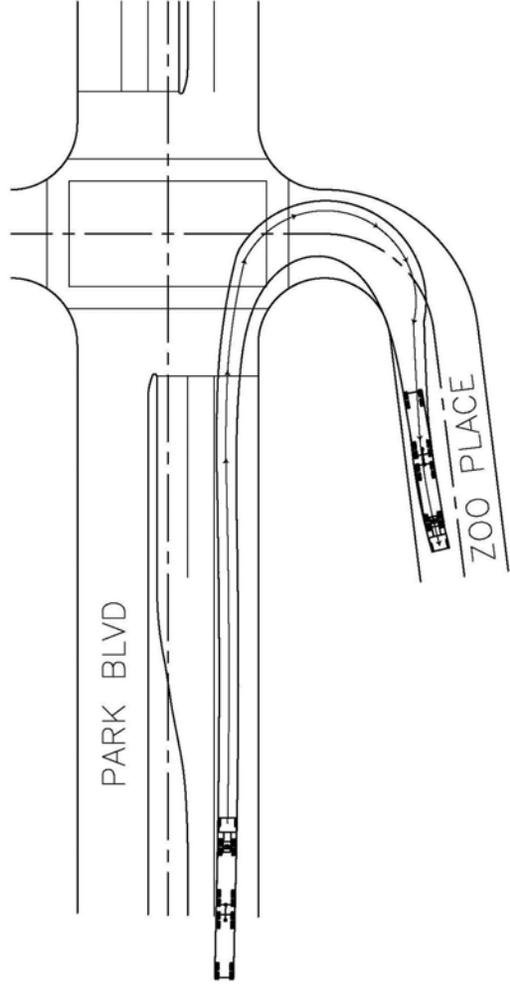


EXHIBIT 12 - SOLAR PANELS ON ROOFTOP PARK TRELLISES
(SHEET 2 OF 3) LAYOUT







DOUBLE BOTTOM DUMP
TRUCK TURNING DIAGRAM
SCALE 1"=50'

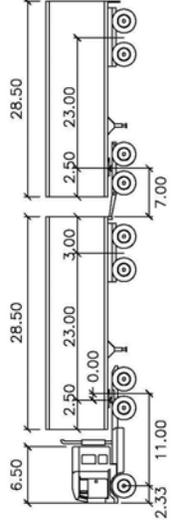
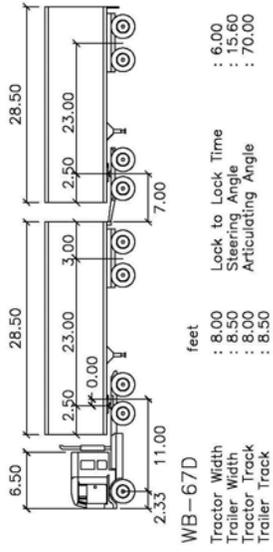
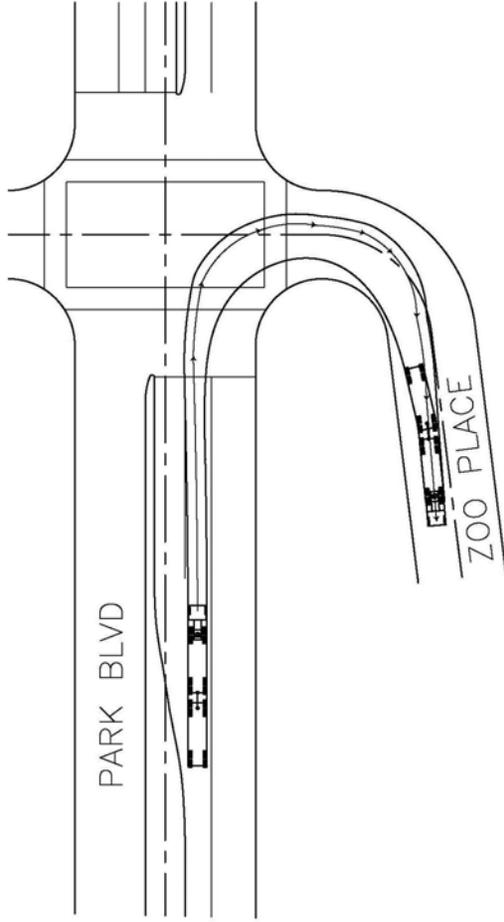
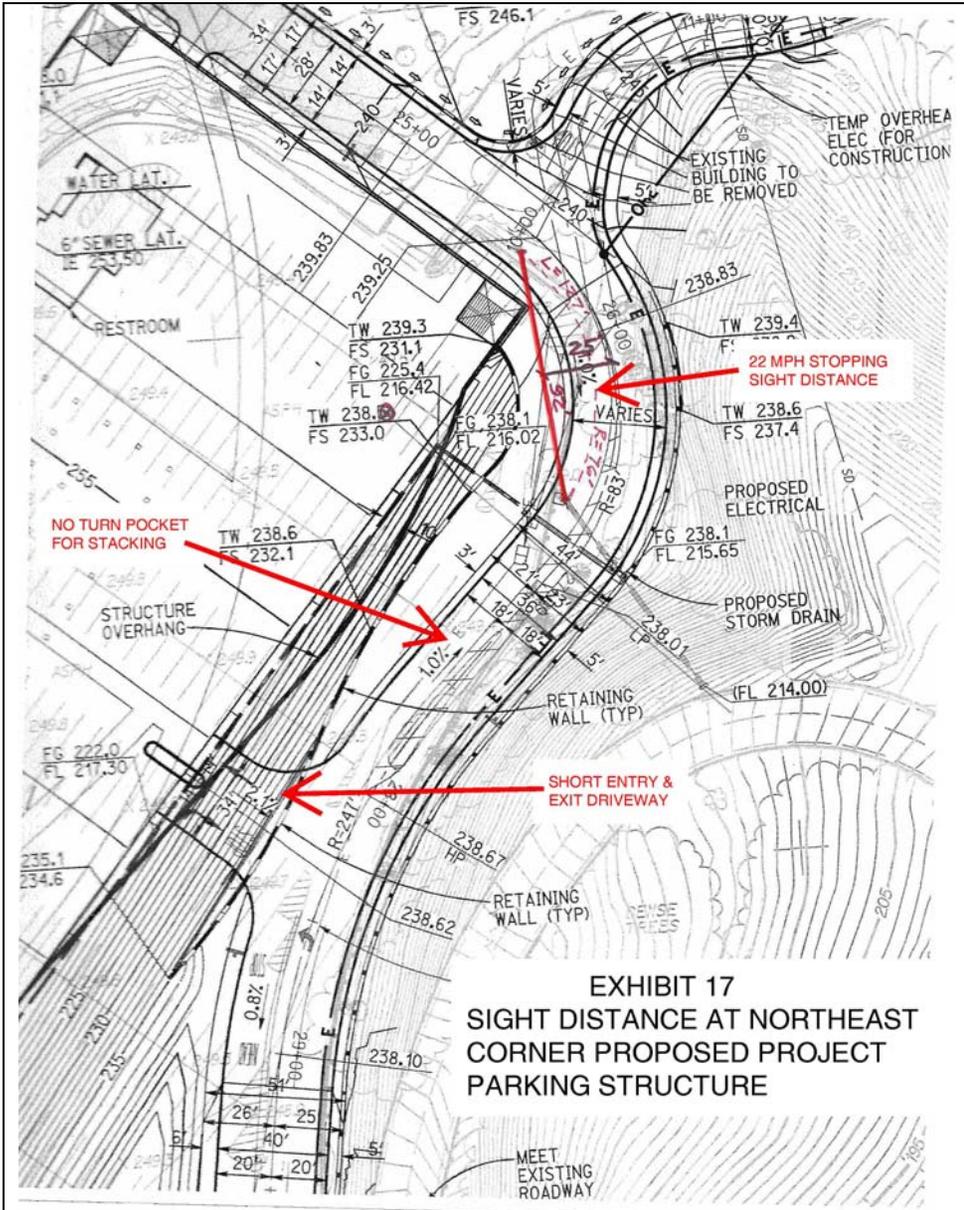


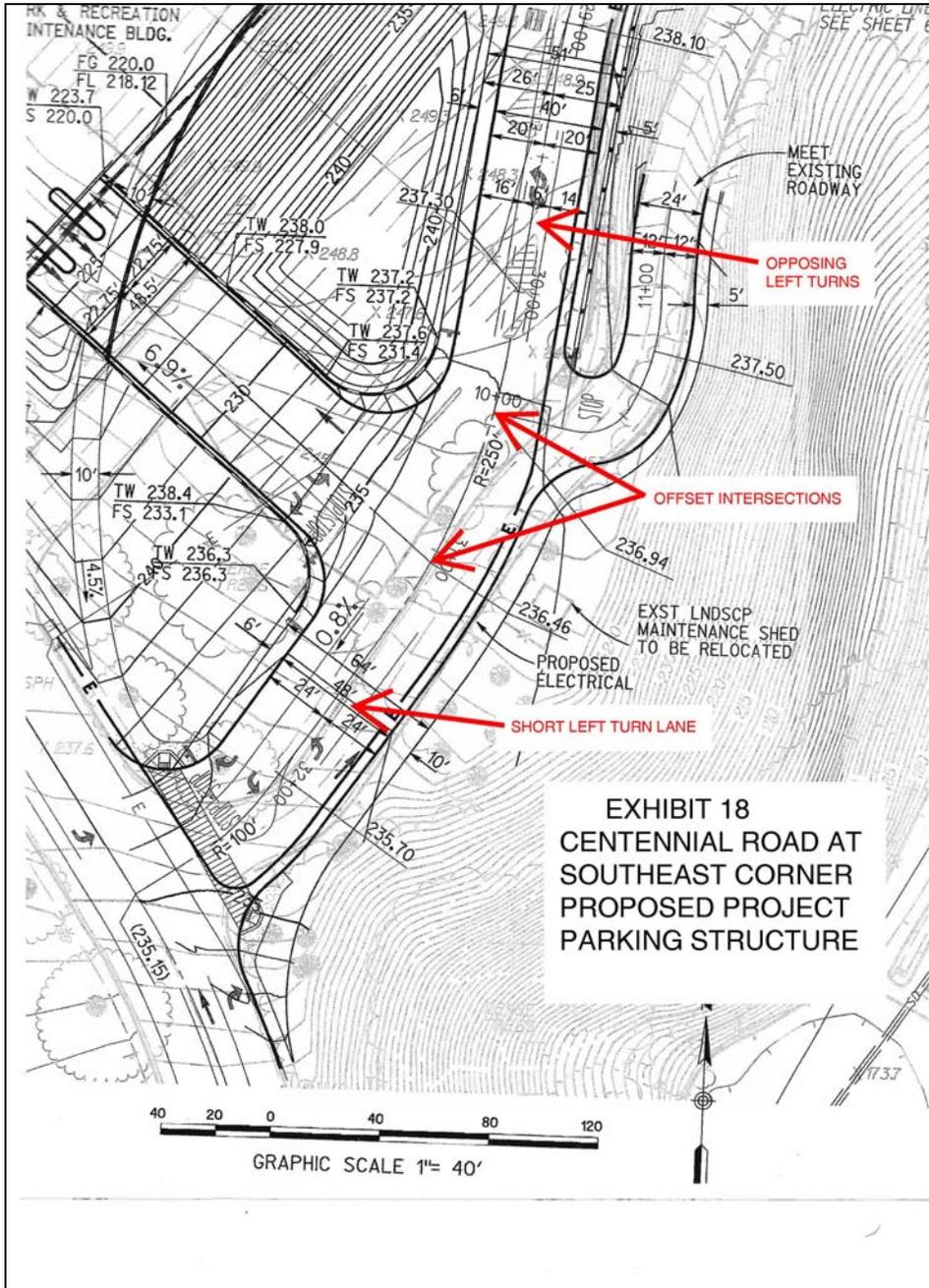
EXHIBIT 14

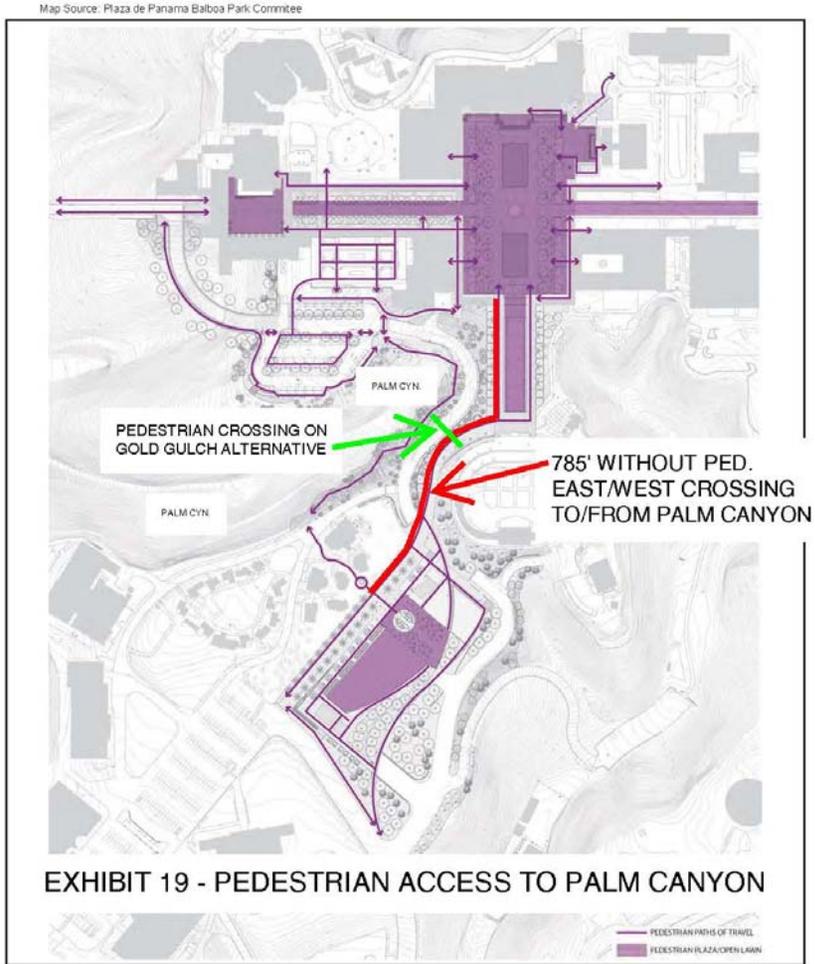
WB-67D	feet	Lock to Lock Time	: 6.00
Tractor Width	: 6.00	Steering Angle	: 15.60
Trailer Width	: 8.50	Articulating Angle	: 70.00
Tractor Track	: 8.00		
Trailer Track	: 8.50		



DOUBLE BOTTOM DUMP
TRUCK TURNING DIAGRAM
SCALE 1"=50'
EXHIBIT 15







No Scale

FIGURE 3-32
Proposed Pedestrian Circulation

M:\J0854\0809\env\graphic\fig3-32.ai 01/13/12

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.

AH-1 Comment noted.

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!

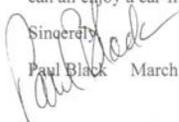
AH-2 Comment noted.

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.

AH-3 Comment noted.

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

LETTER

RESPONSE

Letter AI

From: [Peter Bridge](#)
To: [Lighthouse](#); [Councilmember Sherni Faulconer](#); [Council Member Kevin](#); [Councilmember Todd Gloria](#); [Young Anthony DeMaio](#); [Councilmember Carl Zaaf](#); [Council Member Lorie Emerald](#); [Councilmember Marti Alvarez](#); [Council Member David Sanders](#); [Jerrn](#); [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 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 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>AK-8 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>AK-9 In addition, we find the Environmental Impact report inadequate:</p> <p>AK-10 1. It does not assess and evaluate the users of the park, their income levels, ability, or willingness to pay for parking.</p> <p>AK-11 2. It assumes valet parking to be a necessity but offers no evaluation.</p> <p>AK-12 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>AK-13 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 AL

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

March 21, 2012

Sent via email: DSDFAS@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

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.

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.

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.

AL-5 INTRODUCTION

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.

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.

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.

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

AL-3 The EIR has been prepared consistent with CEQA Guidelines relative to project objectives and alternatives as outlined below.

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.

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).

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.

AL-5 Comment noted.

AL-6 See response to comment AL-3.

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 style="text-align: center;">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>
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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>
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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.

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 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 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

sgehl@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

Letter AS

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

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”).

AS-1

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:

- 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.**

AS-2

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 -

CALIFORNIA STATE PRESERVATION OFFICER WAYNE DONALDSON
CONCERNS REGARDING THIS PROJECT AND THE EIR:

AS-1 Comment noted.

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.

- 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-3 Comment noted.</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-4 Comment noted.</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-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: [DSD 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

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

AU-4

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.

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

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.

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)

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.

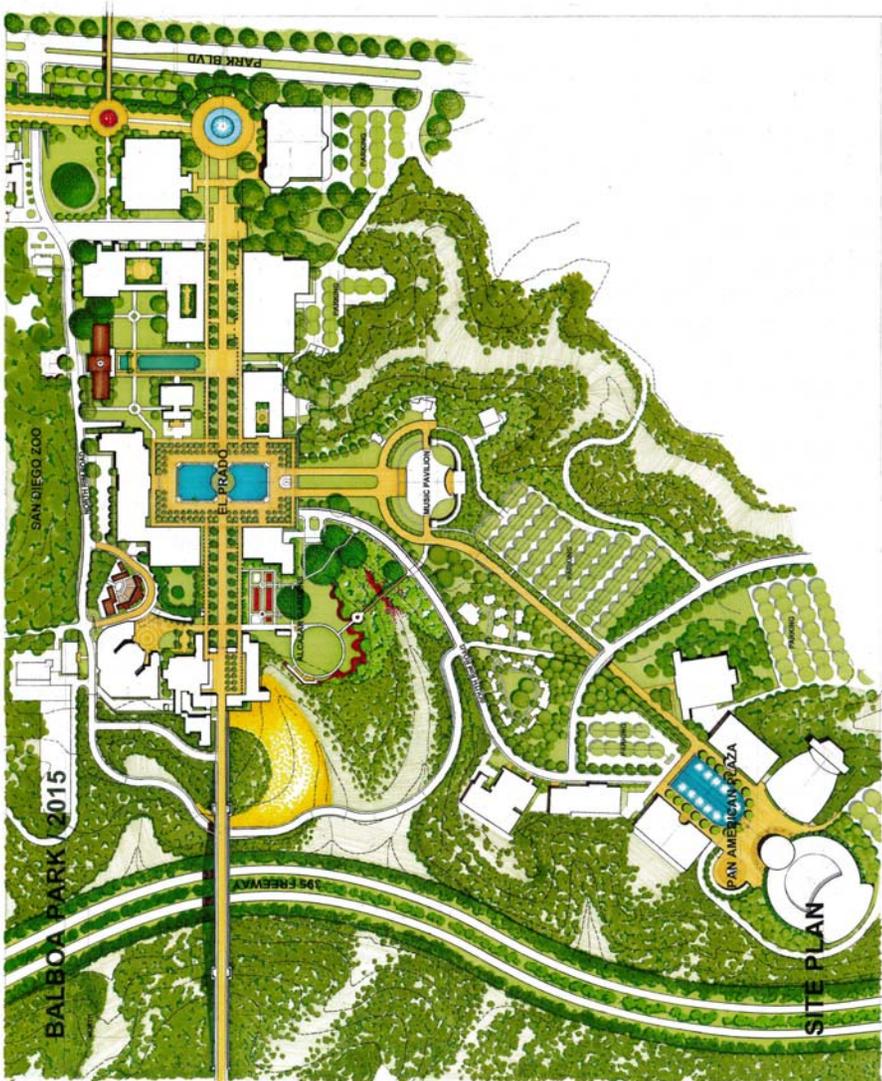
Additionally, constraints that could affect the feasibility of this alternative include the following:

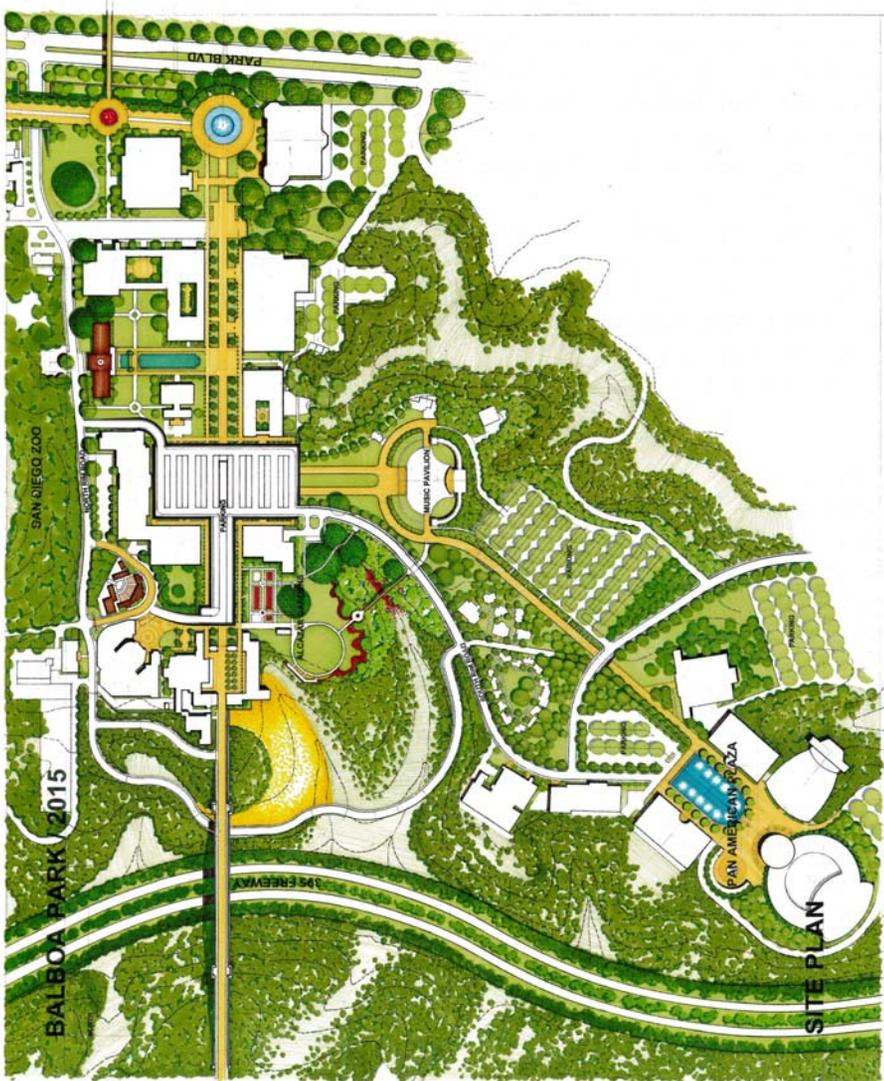
- Encroachment into Zoo leasehold
- Encroachment on Old Globe Theatre
- Road in front of the Old Globe's Festival Stage for a primary access into the new garage posing serious issues because the road functions as a cueing/intermission space.

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 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: sylviahalloff@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: [DSD_EAS](#)
Subject: Plaza de Panama project in Balboa Park
Date: Tuesday, March 06, 2012 11:12:20 AM

AZ-1

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

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 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 Tuberosa Street

San Diego, CA 92105

gizmopennington@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 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.

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.

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: [Seoul, 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 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 <jasaja@me.com>
Date: March 22, 2012 5:58:11 PM PDT
To: DSDEAS@sandiego.gov
Cc: Jay Shumaker <jasaja@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> <p>BI-2 "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> <p>BI-3 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> <p>BI-4 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> <p>BI-5 "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>BI-2 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> <p>BI-3 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> <p>BI-4 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> <p>Future traffic within the Park will occur naturally as a result of population growth.</p> <p>BI-5 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>
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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>
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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>
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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>
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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: pooldood@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 BK

From: [Mike Singleton](#)
 To: [DSD EAS](#)
 Subject: Balboa Park Plaza de Panama EIR Project # 2333958/SCH 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-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 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-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 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-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 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>
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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>
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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
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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 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

MEMORANDUM

BM-4

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.

BM-5

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.

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.

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.

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.

MEMORANDUM

Works Cited

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

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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@sanidiego.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	<p>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."</p>	BN-5 Comment noted.
BN-6	<p>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 it 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.</p>	BN-6 Comment noted.
BN-7	<p>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.</p>	BN-7 Comment noted. See response to comment R-3.
BN-8	<p>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?</p>	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> <ol 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

- 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.

BN-10

- 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> <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.</p> <p>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.</p> <p>BN-13 5) Reuse the Arizona Landfill space within Balboa Park by creating an energy production facility at that location.</p> <p>a. Create a grove of “solar oakz” that uses a vertical solar collection design modeled on trees to generate energy</p> <p>b. Use the methane from the landfill for power</p> <p>c. Drill into the aquifer underneath Balboa Park for geo-thermal power and water</p> <p>d. Use new low cost catalysts that reduce the energy threshold requirements to break the hydrogen/oxygen molecular bond in water</p> <p>e. Produce hydrogen and oxygen for use in powering the Balboa Park transportation fleet and power generation through a Department of Energy grant</p> <p>BN-14 6) Enable Zoo Global to implement their underground parking plan and tie it into the internal and external Balboa Park transportation plan.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>BN-13 Comment noted. It is noted that the East Mesa Precise Plan identifies this site to ultimately be reclaimed as passive use parkland.</p> <p>BN-14 Comment noted.</p> <p>BN-15 Comment noted.</p> <p>BN-16 Comment noted.</p> <p>BN-17 Comment noted.</p>
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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@sandiego.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.

- 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.*

Cecilia Gallardo, AICP
 Assistant Deputy Director
 Development Services Department



Bill Trask

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

PLAZA DE PANAMA PROJECT

Comment submitted by Adrienne Turner – March 19, 2012

Letter BP

- 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

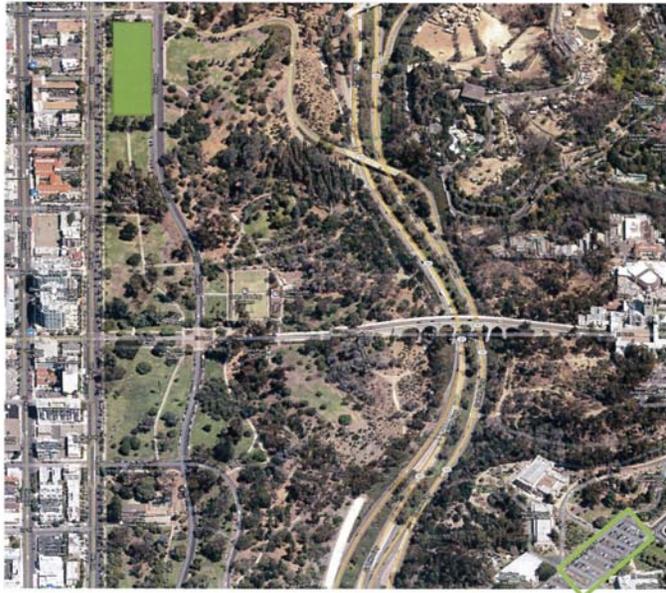
BP-6 Alternative 14

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)



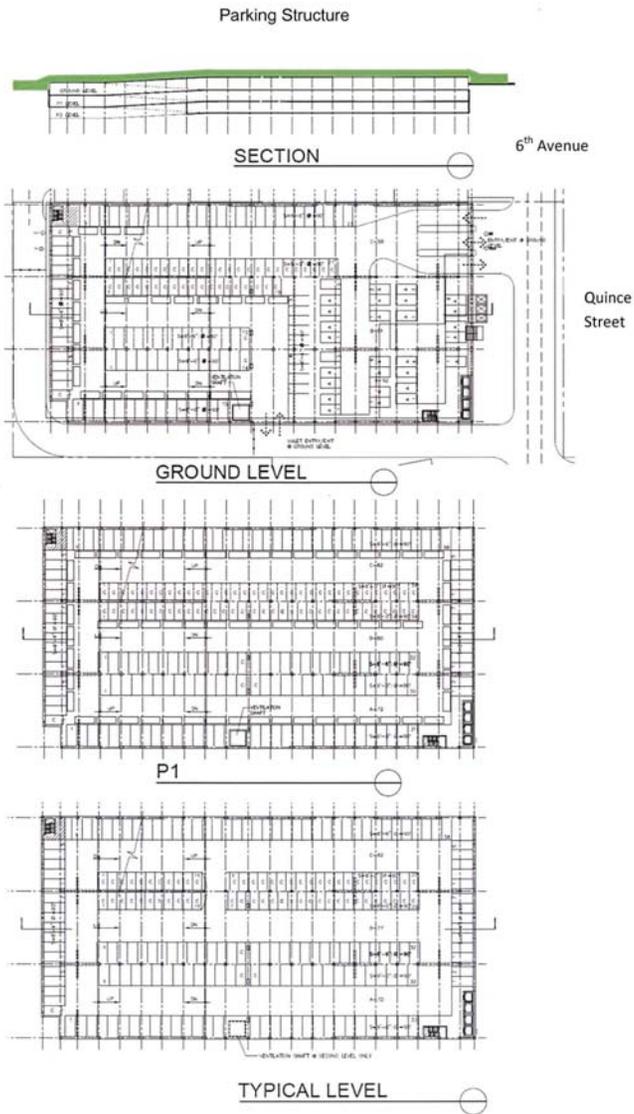
Proposed Alternative 14 submitted by Adrienne Turner, February 18, 2012

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

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

LETTER

RESPONSE



Letter BQ

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

BQ-1

To whom this concerns;

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>
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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>
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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 Standards 2 and 9. What about the congested traffic with too many cars?.
- BS-2 Figure 3-2 roadway and centennial Bridge could be masked with palms and lessen the visual impact. Figure 3-4 Plaza de Panama in 1915, looks people good.
- BS-3 Figure 4.0-1 Parking structure roof looks great.
- BS-4 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.
- BS-5 Overall the draft EIR looks great and well done.
- BS-6

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 NHLD.

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

Plaza De Panama DEIR Comments—Ziebarth

4. Improve the pedestrian link between the Central Mesa’s two cultural cores: El Prado and the Palisades.

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.

6. Complete all work prior to January 2015 for the 1915 Panama-California Exposition centennial celebration.

BT-5 Project Objective 1, which calls for the removal of vehicles, 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.

Historical Analysis:

- 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.
- 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.
- BT-8 3. The Prado was designed to draw pedestrians along the buildings and the Alcazar Garden under covered arcades.
- 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.
- BT-10 5. Even the Project Team admits that the current roadway was used during the 1915 Exposition for ceremonial vehicles.
- 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).
- 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.

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.

As indicated in Section 4.4.5, the project would reduce pedestrian/vehicle conflicts consistent with the BPMP.

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).

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.

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.

BT-7 Comment noted.

BT-8 Comment noted.

BT-8 Comment noted.

BT-9 Comment noted.

BT-10 Comment noted.

BT-11 Comment noted.

BT-12 Comment noted. The project objectives were prepared pursuant to CEQA Section 15124(b) to support the underlying purpose of the project.

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.

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

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.

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 2. Parking Structure:

A

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

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
D
E
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I
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K

- 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.

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

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.

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

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

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

Plaza De Panama DEIR Comments—Ziebarth

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.”

BT-19

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.

BT-20

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.

BT-21

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.

BT-22

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

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.

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

BT-20 The proposed shared condition has been reviewed and approved by the City as compliant with ADA.

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

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.

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.

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.

LETTER

RESPONSE

Plaza De Panama DEIR Comments—Ziebarth

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.

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.

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."

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

B-23 See response to comments AG-3 and AG-21.

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.

B-24 As indicated in Table 4.1-2, the project would be consistent with this BPMP goal.

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.

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.

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

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

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.

BT-25

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."

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.

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:

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.

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.

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-35 Comment noted.

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-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

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-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

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-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

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

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?

BT-40

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 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-park-cambie-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-parkcambie-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-parkcambie-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

RESPONSE

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](#)

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

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