



THE LEAGUE OF WOMEN VOTERS OF SAN DIEGO

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March 20, 2012

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

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

Dear Ms. Shearer-Nguyen:

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

LWVSD Objections to the Proposed Plaza de Panama Project:

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

Specifically, the LWVSD objects to the Project for the following reasons:

First, the proposed Centennial Bridge would create significant unmitigable impacts to the Balboa Park National Historic Landmark District. It is in conflict with the Secretary of the Interior's Rehabilitation Standards and the City's Historical Resource Regulations. It is inconsistent with the goals and policies of the Historic Preservation, Urban Design and Recreation Elements of the General Plan.

Second, the proposed Organ Pavilion underground parking garage would be in the core of the Central Mesa rather than toward the periphery of the Park thus drawing cars into the Park and perpetuating pedestrian-vehicular conflicts. As the Historic Preservation Technical Appendix of the DEIR points out "the unquestioning accommodation of motorists at the expense of pedestrians, not to mention historic aesthetic values, has taken its toll on the Balboa Park Historic District".

LWVSD Support for Alternative 3-D:

The LWVSD supports Alternative 3-D, the Inspiration Point Parking Structure, and believes that this alternative offers numerous benefits including the following:

Alternative 3-D achieves the objective of removing vehicles from the Prado, Plaza de Panama, Plaza de California, the Mall and the existing Organ Pavilion parking lot, thereby alleviating land use compatibility issues associated with pedestrian-vehicular conflicts and achieving an overarching goal of the Balboa Park Master Plan.

Alternative 3-D complies with all of the Secretary of the Interior's Standards for historic preservation, unlike the proposed project.

Alternative 3-D would be consistent with historic preservation, recreation and urban design policies of the General Plan.

Alternative 3-D enables more land to be reclaimed for park space than the proposed Project while providing the same amount of additional garage spaces.

Alternative 3-D would meet the major goals of the Balboa Park Master Plan and Central Mesa Precise Plan. These include creating a pedestrian oriented park environment with convenient accessibility, reducing pedestrian-vehicular conflicts, increasing free and open parkland and restoring or improving existing building and landscaped areas while preserving historical significance.

Alternative 3-D, through appropriate design, could meet Airport Land Use Compatibility (ALUC) and Airport Environs Overlay Zone (AEOZ) restrictions and address the view corridor and future traffic impacts identified in the DEIR. The traffic impacts would be further mitigated by SANDAG's plans to develop a new street car line that would connect Hillcrest, Balboa Park and Downtown. This project was identified in the recently adopted 2050 Regional Transportation Plan. It was not taken into account by the DEIR.

Alternative 3-D could also allow managed vehicle access in the Plaza de Panama for special events just as the proposed Project would. This alternative would also rely on an efficient tram system with frequent service and access to the Alcazar Parking Lot for from President's Way for ADA parking, valet services or drop-off as described in the DEIR.

Alternative 3-D achieves all of the Project Objectives with the exception of the second half of Objective #1 which calls for ". . . maintaining public and proximate vehicular access to the institutions which are '*vital to the park's success and longevity*', a statement that is unsubstantiated.

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

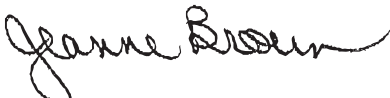
"Garages should be located with two goals in mind: reduction of pedestrian conflict, and reclamation of parkland. The simplest way to reduce pedestrian conflict is to capture cars at or near park entries, thereby reducing vehicular traffic in pedestrian areas. While everyone would like to park by the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

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

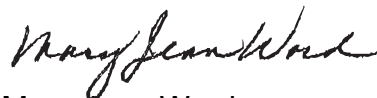
The Jones and Jones Report states on Page 80: "Because of the practical constraints of public space built atop structure, the Team feels it is highly preferable that these reclamations be on solid ground rather than (on a) structure."

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

Sincerely,



Jeanne Brown
Co-President



Mary Jean Word
Co-President

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