

# Ziebarth Associates

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

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:

**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.

- 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:**

**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.

**A r c h i t e c t u r e / P l a n n i n g**

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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.

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:

1. Cabrillo Bridge was designed as a vehicular and pedestrian bridge historically and not as a pedestrian bridge. This is clear from its design.
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.
3. The Prado was designed to draw pedestrians along the buildings and the Alcazar Garden under covered arcades.
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.
5. Even the Project Team admits that the current roadway was used during the 1915 Exposition for ceremonial vehicles.
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).
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.
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:**

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:

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 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.

## 2. Parking Structure:

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

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

- 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.

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.
8. “PRADO AND PALISADES RESTORATION: The Prado and Palisades plazas shall be restored as pedestrian-oriented plazas in which traffic is minimized and conflicts with pedestrians are reduced.”
  - a. The DEIR states that “the project would not provide improvements within the Palisades area; however, the proposed design has been developed to enable the Palisades to be returned to pedestrian uses at a future time.”

Comment:

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

President's Way, because it assumed that the parking in the Palisades would remain.

2) The DEIR fails to identify that the Half Plaza or BPMP plan for the Plaza de Panama is consistent with this goal.

9. "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.

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?

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:

- 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.

#### **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.

#### **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.

### **Traffic and Safety:**

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?
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.
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.
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.
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 in 2030 when the Centennial Bridge and Centennial Road will fail capacity. The DEIR identifies that this failure is not the result of the Project, but why should a Project with significant unavoidable impacts be approved when it is anticipated being over capacity in 2030?

**Conclusion:**

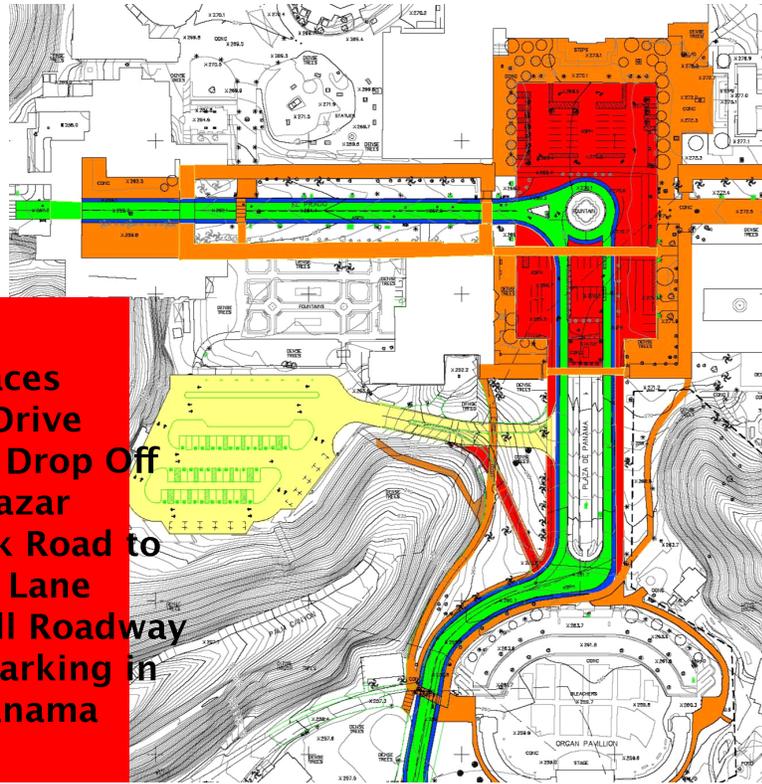
A tremendous effort has gone into this project and the DEIR. However, I believe that there are serious concerns, misstatements in the DEIR, and additional analysis in the DEIR needed. Even without this additional analysis, there is sufficient information in the DEIR to seriously question the justification to make overriding findings to approve this Project which has significant unavoidable impacts. I look forward to reviewing the responses to comments from my comments and the other comments that are being submitted.

Respectfully,

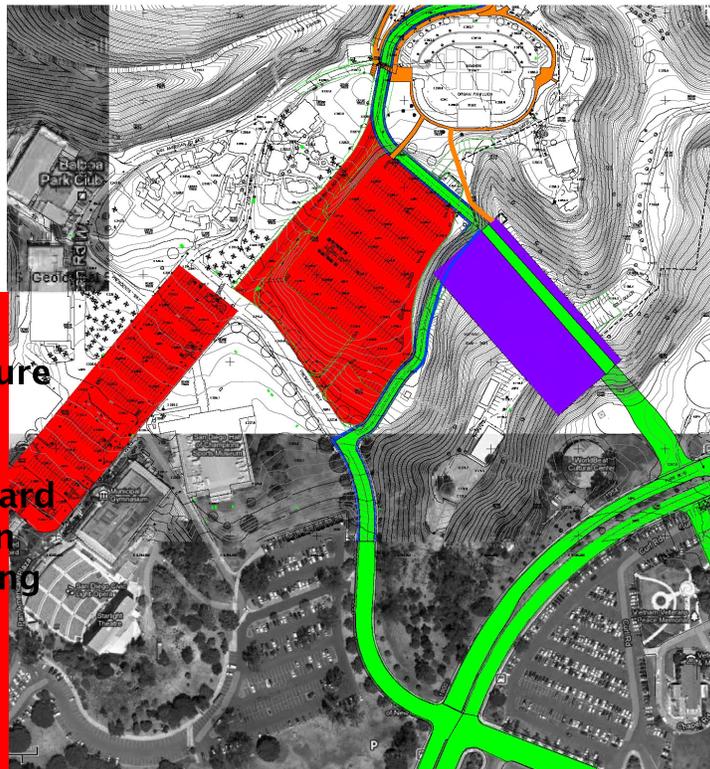
A handwritten signature in black ink, appearing to read "John C. Ziebarth". The signature is written in a cursive, flowing style.

John C. Ziebarth, AIA, LEED AP

# **Alternative to the Proposed Project**



- Alternate:**
1. Add 78 spaces on Balboa Drive
  2. Disabled & Drop Off Built in Alcazar
  3. Modify Park Road to create Bike Lane
  4. Narrow Mall Roadway
  5. Eliminate Parking in Plaza de Panama



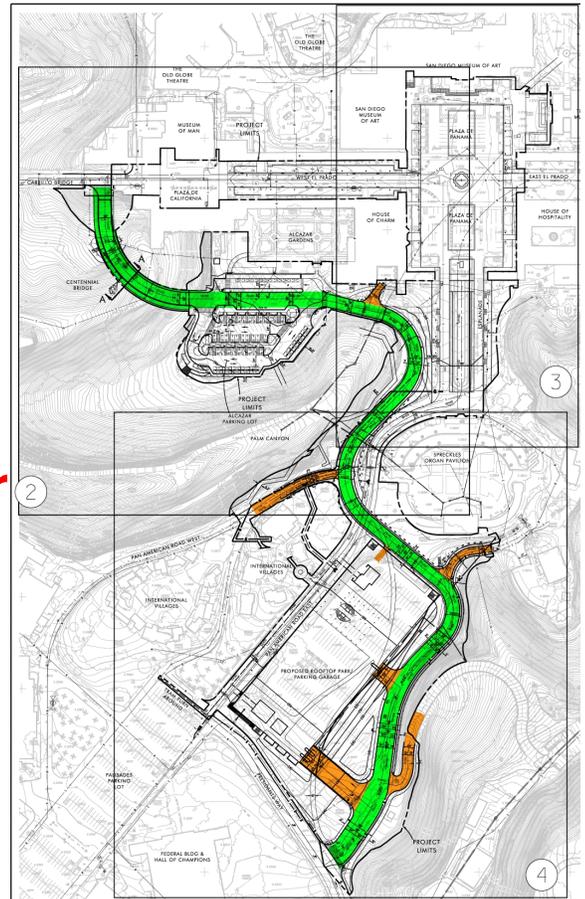
- Alternative:**
1. Parking Structure In Gold Gulch
  2. Road Connect to Park Boulevard
  3. Convert Organ Pavilion Parking & Palisades Parking to Useable Park Land



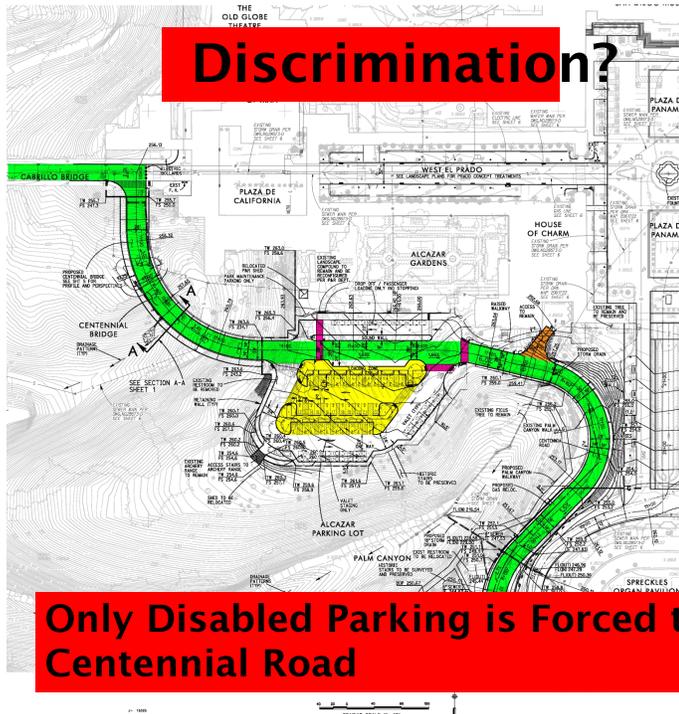
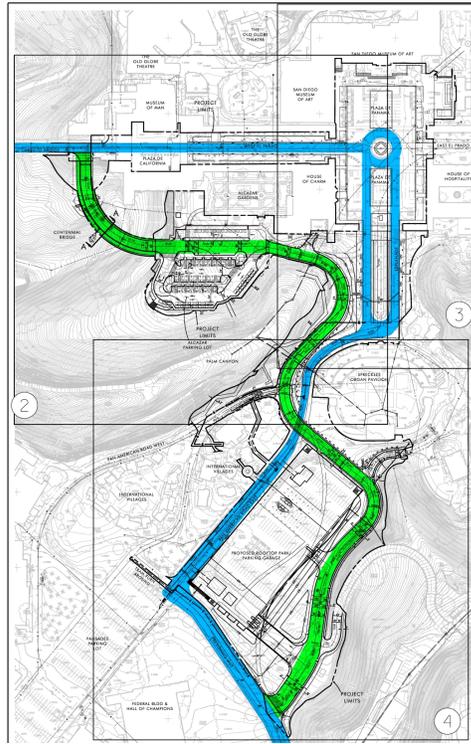
## DEIR Comments and Ques

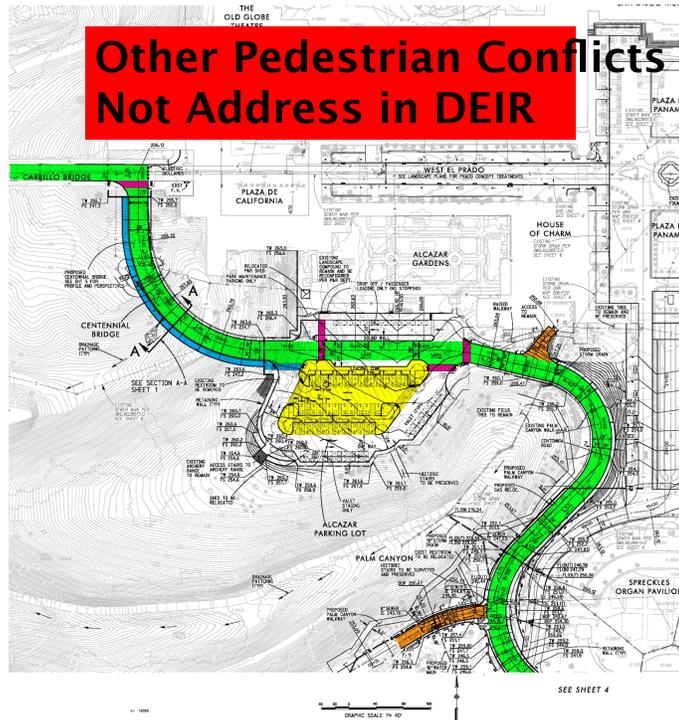
### Proposed Project Circulation

1. Induce Traffic?
2. Safer?
3. Discriminator
4. Accessibility Impact?

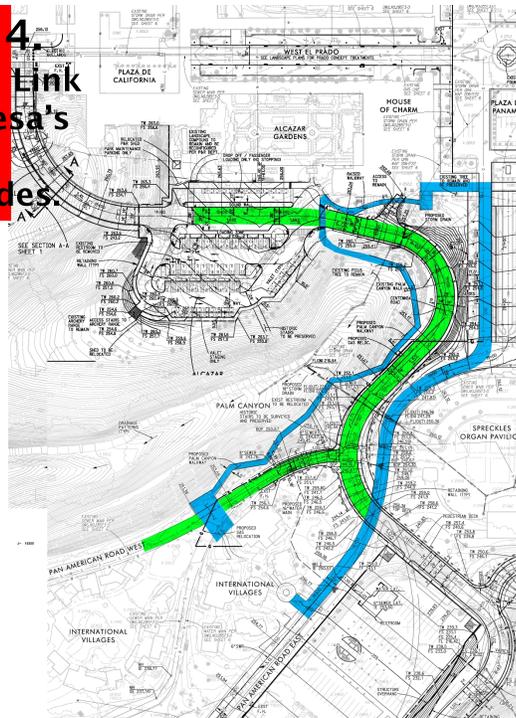


**Proposed  
Project  
Circulation**  
*Or*  
**Existing  
Circulation**





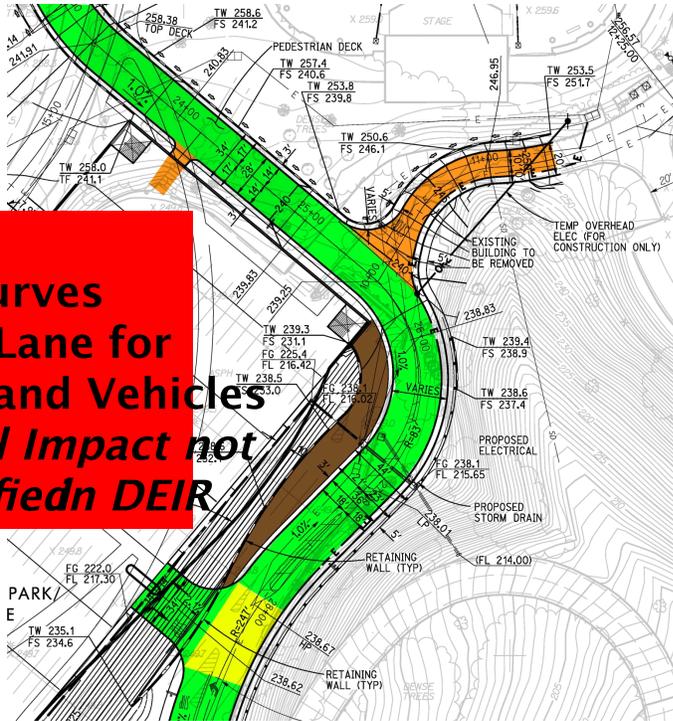
**Project Objective 4:  
Improve the Pedestrian Link  
Between the Central Mesa's  
two cultural cores:  
El Prado and the Palisades.**



**Safety:**

- Blind Curves
- Shared Lane for Bikes and Vehicles

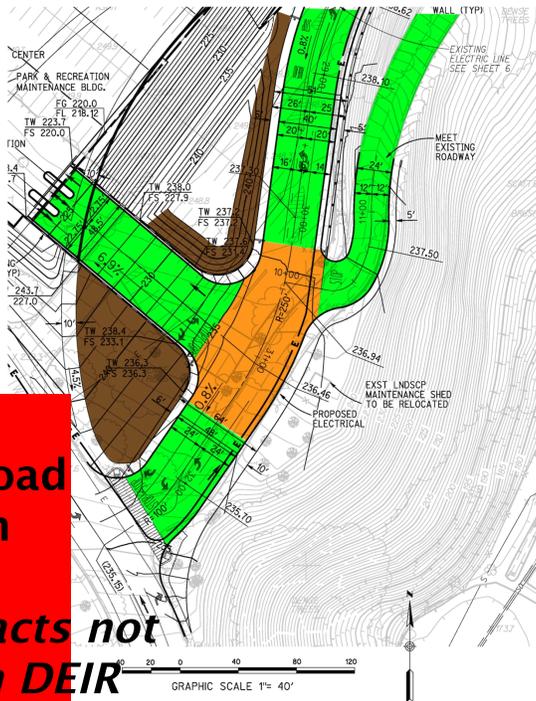
❖ *Potential Impact not identifiedn DEIR*



**Safety:**

- Dangerous Road Configuration
- Slope Impacts

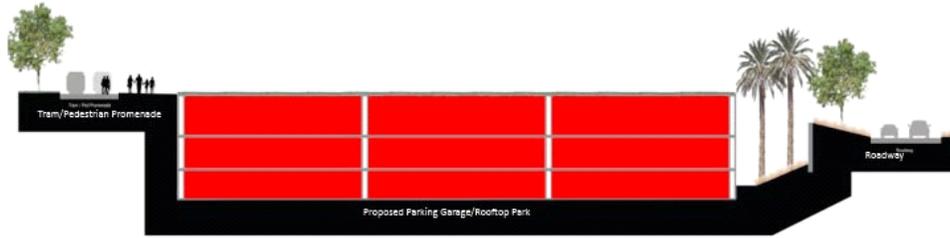
❖ *Potential Impacts not identified in DEIR*



### Section – Parking Structure/Rooftop Park

The top of parking structure is level with the Tram/ Ped. Promenade and the International Houses to the northwest

Roadway along southeast side of garage/rooftop park emphasizes the experience of Gold Gulch Canyon, while minimizing the views of the parking garage



**Does this Make Sense or is It a Solution being**

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Plaza de Panama Balboa Park Committee Meeting # 4 01 08 2011

bypass road