



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

March 20, 2012

Dear City Staff and Decision Makers:

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

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

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

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

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

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

Sincerely,

Danielle Dorsey  
Executive Director, PHCC - SD

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