



## CITIZENS COORDINATE FOR CENTURY 3

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

### DIRECTORS

John Lomac - President

Jay Corrales

Drew Hubbell

Roger Lewis

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Luisa Schultz

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March 21, 2012

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

RE: Balboa Park Plaza de Panama (Project No. 233958/SCH No. 2011031074)

Dear Ms. Shearer-Nguyen:

Attached please find comments on the Plaza de Panama Draft Environmental Impact Report prepared by several members of C3's Parks & Open Space committee. C3's board of directors will be meeting on April 8<sup>th</sup> to review the committee's work product. Please note that C3 enables specific standing committees to respond on behalf of the organization, particularly on a time sensitive basis such as this draft EIR, when the issue is one in which C3 has demonstrated civic experience and has position statements in place to guide the committee's actions.

As mentioned above, C3 has a long-standing interest in all aspects of issues relating to Balboa Park. In recent decades our organization has actively participated in the draft processes of the Balboa Park Master Plan in 1986, the Central Mesa Precise Plan in 1992, as well as many other studies, including: traffic circulation, parking, landscape architecture, pedestrian access, museum building expansion, and more.

With respect to the proposed project the only position C3 has taken to date is to oppose the construction of the bypass bridge off of the Cabrillo Bridge. C3 is aligned with the many other civic and community organizations who wish to emphasize pedestrian use of the park and to de-emphasize automobile use within the park, particularly within the Central Mesa.

C3 strongly supports both in concept and in implementation, an intra-park shuttle service to accommodate reduced vehicular access within the Central Mesa. The proposed tram service that is a part of the Plaza de Panama project fails in that effort. The proposed project encourages automobile use rather than discourages such.

Your responses to the questions raised by C3's Parks & Open Space committee to the Plaza de Panama Draft EIR are appreciated.

Sincerely,

John Lomac  
2012 C3 President

**COMMENTS ON PLAZA DE PANAMA DRAFT ENVIRONMENTAL IMPACT REPORT**  
**Citizens Coordinate for Century 3    March 22, 2012**

It is evident that if a choice must be made over status quo, that the Project Objectives – established by proponent and imposed on each alternative as absolutes, required to be met – must be reassessed relative to the physical, historical, visual range of alternatives covered in this document. It has become more and more obvious that this is a classic situation where the “cure” is far worse than the “illness”.

<p>DEIR Part 1, Exec. Summary, S.1.3., Project Objectives &amp; Part 4, Section 9.0</p>	<p>DEIR objective is stated as <i>“Restore pedestrian and park uses to the Central Mesa; alleviate vehicle and pedestrian conflicts.”</i></p> <p>All of the enumerated objectives can be achieved in far less intrusive and less costly ways by either closing the Cabrillo Bridge to vehicles altogether or to close Cabrillo Bridge to vehicles on a managed schedule, as has been practiced in Golden Gate Park and Central Park for several years.</p>
<p>DEIR Part 1, Exec. Summary, S.5.1., &amp; Part 4, Section 9.3.2, + Figure 9.2a, 9.2b [p.53ff of 344]</p>	<p>Alternative 1: <u>No Project (Existing Conditions)</u></p> <p><u>COMMENT:</u> This is how traffic in &amp; through many urban parks increasingly is managed, particularly Golden Gate Park &amp; Central Park (weekends); see TPL CCPE reports from 2007-2008 etc.</p> <p><u>COMMENT:</u> This is not the same as a No Project (Existing Conditions) and it is incorrect to equate the CMPP Alternative with a No Project (Existing Conditions) Alternative. The CMPP Alternative must be evaluated at the same level all alternatives that do not maintain “existing conditions”.</p>
<p>Alternative 2 DEIR Part 1, Exec. Summary, S.5.1. &amp; Part 4, Section 9.3.2, + Figures 9.2a, 9.2b</p>	<p>Alternative 2: <u>No Project (Central Mesa Precise Plan):</u></p> <p><u>COMMENT:</u> This is not the same as No Project (Existing Conditions) and it is incorrect to equate the CMPP Alternative with a No Project (Existing Conditions) Alternative. The CMPP Alternative must be evaluated at the same level all alternatives that do not maintain “existing conditions”.</p> <p>DEIR states that the CMPP plan calls for managed traffic: 1-way (9:30-5:00); 2-way all other times.</p> <p><u>COMMENT:</u> This is, increasingly, how traffic into &amp; through many urban parks increasingly is managed, particularly Golden Gate Park &amp; Central Park (weekends); see TPL CCPE reports from 2007-2008 etc. This traffic management solution should receive serious emphasis in deciding on which alternative or elements of alternatives that should be considered for approval.</p> <p><u>QUESTION:</u> On comparing data on traffic impacts in Alternative 2 with traffic impact data given for Alternative 1 (A St., Robinson,</p>

	<p>Sixth), how can you determine that increases in traffic on certain external streets are not the result of natural increase with or without CMPP alternative and/or Project?</p> <p>Please specify the cost per parking space in the Organ Pavilion parking structure. Since the majority of the spaces in the structure are already in place within the Central Mesa and "paid for", we would be "buying" 798 spaces, including only 273 new.</p>
<p>DEIR Part 1, Exec. Summary, S.5.2.2. &amp; Part 4, Section 9, 9.3.3A + Figures 9.3a, 9.3b</p>	<p><u>Alternative 3A: No New Parking Structure Alternative</u></p> <p>DEIR states that the No New Parking Structure will result in a net loss of 158 non-ADA parking spaces.</p> <p><u>QUESTION:</u> Where are all of the lost ADA spaces located today other than Plaza de Panama &amp; Alcazar lot? Would these not be replaced by marking more spaces in the Organ Pavilion lot as ADA?</p> <p>DEIR states that Alt. 3A would have greater traffic impacts compared to the proposed project in near term and in 2030, internal and external roadways/intersections would operate poorly, constituting significant and unmitigable impacts.</p> <p><u>QUESTION:</u> What, specifically, are these greater impacts? To what extent would these impacts be expected to occur naturally, with or without projects?</p>
<p>DEIR Part 1, Exec. Summary, S.5.2.2. &amp; Part 4, Section 9, 9.3.3B</p>	<p><u>Alternative 3B: Organ Pavilion Parking Structure</u></p> <p>No specific comments or questions; this alternative is essentially approved in the adopted BPMP &amp; CMPP.</p>
<p>DEIR Part 1, Exec. Summary, S.5.2.3. &amp; Part 4, Section 9, 9.3.3C + Figures 9-5a, 9-5b</p>	<p><u>Alternative 3C: West Mesa Parking Structure Alternative</u></p> <p><u>QUESTION:</u> Why only 978 spaces? Can location accommodate only this size? Could location accommodate greater number of spaces? Or was number selected to match Project OP structure without consideration that the alternative location might accommodate more than 978 spaces?</p>
<p>DEIR Part 1, Exec. Summary, S.5.2.3. &amp; Part 4, Section 9, 9.3.3D + Figures 9-6a, 9-6b</p>	<p><u>Alternative 3D: Inspiration Point Parking Structure</u></p> <p><u>COMMENT:</u> The analysis should include study of this alternative with open bridge, with and without managed traffic. Instead, the analysis done assumes that this alternative can function only with full closure of Cabrillo Bridge.</p> <p><u>QUESTION:</u> Why did the consultants evaluate an above-ground structure at this site and not an underground structure that would take advantage of the existing terracing and descending terrain? This has always been the configuration assumed by most citizens involved in Balboa Park planning. This should be evaluated and an honest estimate of parking spaces arrived at for a below-ground structure with park on top at the current street level of Park Blvd. @President's Way.</p>

<p>Alternative 3C continued</p>	<p><u>QUESTION:</u> Why did consultants consider only a structure the same size as OP garage instead of maximizing space at Inspiration Point where surface parking accommodates 1264 spaces, per consultant Table 4.4-4, actually reducing the number of parking spaces overall?</p> <p><u>QUESTION:</u> What is the number of spaces in the northeast sector of Inspiration Point?</p> <p><u>QUESTION:</u> Even with surface spaces northeast of Park Blvd/President's Way subtracted, the area southeast surely could accommodate more than 798 spaces. Why is this not true?</p> <p>The DEIR states that, with Alternative 3DA, the tram would loop from the parking structure to the Mall/Plaza de Panama.</p> <p><u>QUESTION:</u> Why is there no provision for a tram loop continuing west across Cabrillo Bridge &amp; return (especially under the assumed closure to vehicles on the bridge in this alternative)?</p> <p><u>QUESTION:</u> If Cabrillo Bridge remained open with CMPP as adopted or with CMPP + managed traffic, what would the impacts be on internal and external roadways/intersections? This should have been included in evaluation of alternatives.</p> <p><u>COMMENT:</u> ALUC/AEOZ designations are designed primarily for residential and intensive commercial development and provisions can be waived by local jurisdiction; furthermore, a subterranean structure would be at no greater elevation than the higher portions of the surface lot so should not be an ALUC/AEOZ concern.</p> <p><u>COMMENT re View Corridor obstruction:</u> If structure were subterranean, there would be no obstruction of public view corridors. This is alternative variation should have been evaluated.</p> <p><u>COMMENT:</u> As is true in other alternatives that the DEIR calls out as farther from Plaza de Panama than the OP garage, a good, frequent tram system would resolve access to PdeP &amp; Prado institutions.</p>
<p>DEIR Part 1, Exec. Summary, S.5.3.1.a. &amp; Part 4, Section 9.3.4Ai + Figures 9-7a, 9-7b</p>	<p>Alternative 4Ai: <u>Gold Gulch Parking Structure Alternative</u></p> <p><u>QUESTION:</u> DEIR states that this alternative would maintain vehicle traffic across Cabrillo Bridge plus a new "Park Road" along edge of (Palm Canyon?) yet the very next sentence states that Cabrillo Bridge will be pedestrianized. Which is it?</p> <p><u>QUESTION:</u> How does "new Park Road" differ from Centennial Road? Do they mean that the new park road will cross the edge of Gold Gulch?</p> <p><u>QUESTION:</u> What is between Gold Gulch and Park Blvd. which might be impacted by the new park road? (Centro de la Raza?</p>

Alternative 4Ai continued	World Beat Center? Entry road to Japanese Friendship Garden?) <u>QUESTION</u> : How much parkland would be regained with this alternative?
DEIR Part 1, Exec. Summary, S.5.3.2.b. & Part 4, Section 9.3.4Aii + Figure 9-8	Alternative 4Aii: <u>No Paid Parking Alternative</u> The DEIR states that traffic & circulation impacts would be slightly greater with no paid parking with than Project because lack of parking fee would result in greater concentration of visitors seeking to park at the Organ Pavilion structure.  <u>QUESTION</u> : Not clear on what is meant here – seems to state that this alternative would have identical impacts yet slightly greater than fee-based OP Structure, per DEIR. Are the consultants suggesting that fewer people would seek to park in the OP garage with paid parking (which fees are intended to pay off bonds and support a tram system)?
DEIR Part 1, Exec. Summary, S.5.3.2.a. & Part 4, Section 9.3.4Bi + Figures 9-9a, 9-9b	Alternative 4Bi: <u>Tunnel Alternative</u> DEIR states that this alternative would introduce a contemporary element into the historical setting. <u>QUESTION</u> : Isn't this equally true for the Centennial Bridge?  DEIR states that this alternative would not be consistent with SOI Standards 2 & 9. <u>QUESTION</u> : Isn't this equally true for the Centennial Bridge? DEIR states that this alternative does not conform to a long list of existing policies and planning documents. Isn't this equally true for the Centennial Bridge? In general, the complete details studied in all alternatives seem to be called out selectively in some alternatives and not others, mostly specific aspects that (it is argued) make an alternative unsuitable even though often they are equally true for the Project itself. This is particularly noticeable where the intersection and street segments are specifically called out in some alternative summaries but not in all alternatives (for example but not limited to this).
DEIR Part 1, Exec. Summary, S.5.3.2.b. & Part 4, Section 9.3.4Bii +Figures 9-10a, 9-10b	Alternative 4Bii: <u>Stop-Light (One-Way) Alternative</u> No specific questions or comments.
DEIR Part 1, Exec. Summary, S.5.3.2.c. & Part 4, Section 9.3.4Biii +Figures 9-11a, 9-11b	Alternative 4Biii: <u>Modified CMPP w/o Parking Structure</u> No specific questions or comments.
DEIR Part 1, Exec. Summary, S.5.3.2.c. & Part 4, Section 9.3.4Biv +Figures 9-11a, 9-11b	Alternative 4Biv: <u>Half-Plaza (Environmentally Superior) Alternative</u>  <u>QUESTION</u> : Will the road comprising the "one-way loop" be narrowed from its present configuration?

<p>Alternative 4Biv continued</p>	<p>DEIR states this alternative's "impacts to historic resources would be significant and unmitigable" but fails to point out that the changes can easily be reversed, unlike changes for a permanent Centennial Bridge, Centennial Road and reconfigured Alcazar lot.</p> <p><u>QUESTION:</u> Why is that argument made for this alternative yet, in evaluation of the Project itself, the argument is made that the bypass, new road and reconfigured Alcazar lot could be reversed at some time in the future despite the reality that anything this massive is very unlikely to be torn down once built.</p> <p>DEIR states that "The El Cid Island component was "determined in the historical analysis as disrupting the spatial relationships in the area, could significantly alter key views, identified in the CMPP, specifically the view from the Museum of Art looking south and the view from the Organ Pavilion and the Mall looking north".</p> <p><u>QUESTION:</u> Please explain how adding ground level green space will be obstructive to views up and down the Mall between the Plaza de Panama and the Organ Pavilion. Why isn't this also true in the Project and in all alternatives since neither the statue nor the fountain will be removed?</p> <p><u>QUESTION:</u> Why are impacts considered "significant and unmitigable" in many of the alternatives as an argument against each alternative when the exact same issues are true for the Project itself?</p> <p>The DEIR states that "The intersection of El Prado/Plaza de Panama would continue to operate as LOS F". When and how often does this occur today? What documentation is there to show that this intersection operates at LOS F and when does this occur?</p> <p>The DEIR states that "High pedestrian/vehicular conflict areas and volumes, especially at the El Prado/Plaza de Panama intersection, are expected to cause considerable queuing.. anticipated to spill back to nearby adjacent intersections" (tram &amp; valet drop-off areas). Why isn't this equally true for the Alcazar lot in the Project configuration, with the queuing and backup simply shifting to the Cabrillo Bridge/Centennial Bridge intersection and within the Alcazar lot at the drop-off &amp; valet location?</p>
<p>DEIR Part 1, Exec. Summary, S.5.4 &amp; Part 4, Section 9.3.5 + Figure 9-13</p>	<p>Alternative 5: <u>Phased Alternative</u></p> <p>No specific comments or questions.</p>
<p>DEIR Part 1, Section 9.2.1</p>	<p>Alternatives Considered But Rejected: <u>2004 Jone and Jones Land Use, Circulation and Parking Study</u></p> <p>A reason given for rejecting this alternative is that it is "much larger in scope" and "would likely be infeasible from an economic standpoint".</p>

2004 J&J Study continued	<p>QUESTION: Why must this excellent study be seen as an "All or Nothing" plan even though there are elements within it which could be adapted to achieve some of the goals regarding parking and traffic circulation?</p> <p>All of the reasons given for rejection of this as an alternative assume this "All or Nothing" approach and seem more for the purpose of supporting rejection of detailed analysis in competition to the Proposed Project Plan.</p>
<p>DEIR Part 2, Sec. 3.4.3.1, Project Description, Centennial Bridge, Fig. 3-12 &amp; Appendix C, Centennial Bridge Photographic Survey, Photo Location 17</p>	<p>Whereas it says Centennial Bridge would be designed to minimize its visibility, there is inconsistency between illustrations of the bridge in so far as the portion above the roadway. In the Typical Section view in Figure 3-12 there are raised concrete barriers between the pedestrian walkway and the roadway and along the inside radius of the bridge. However, the illustration of the Existing Condition with Rendering of Centennial Bridge on the page Photo Location 17 of the Centennial Bridge Photographic Survey seems to show only the see-through railing on the outside radius.</p> <p>Additionally, it appears that all of the renderings in the Centennial Bridge Photographic Survey that show the bridge omit the lighting standards that are on the bridge according to Figure 3-12.</p>
<p>DEIR Part 2, Sec. 3.4.3.2, Project Description, Centennial Road &amp; Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Centennial Road &amp; Appendix B-1, Sec. VIII, part D., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Evaluation of the Project Pursuant to the Secretary of the Interior's Standards, Cabrillo Bridge and Centennial Road</p>	<p>It is unclear what changes are to be made to the 1970s Palm Canyon Walkway which is an existing raised wood pedestrian path that connects the Alcazar parking lot with the Mall. Section 3.4.3.2 says it is to be realigned. Appendix B-1, Section VIII, part A implies it will be retained and extended, saying: The boardwalk that would run inside the eastern rim of Palm Canyon, from the existing 1976-era boardwalk to a new "Palm Canyon Overlook" that would be constructed near the site of the existing toilet room. Appendix B-1, Section VIII, part D says this will be a beneficial addition and be compatible, but no more detail is provided. Details are needed for the boardwalk/bridge and new overlook in order to assess the impacts of those developments.</p>
<p>DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot, Fig. 3-17, Proposed Alcazar Parking Lot Redesign &amp; Sec. 4.2, Environmental Analysis, Historical Resources</p>	<p>What is the significance, if any, of the "Historic Bridge Abutment" shown in Figure 3-17. It appears in the figure (both in the Existing Condition, where it is identified, and in the Parking Lot Redesign graphics), but it is not discussed in the text of Section 4.2.</p>

DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot & DEIR Part 2, Sec. 3.4.7.3 a, Project Description, Parking, Proposed Parking Changes	A concise detail of the valet parking operation does not appear anywhere. Is this to be a "permanent" system? Limited or 7 days-24 hours? Will valet parking spaces be available to the general public when the system is not operating?
DEIR Part 2, Sec. 3.4.4, Project Description, Alcazar Parking Lot, Fig. 3-19, Proposed ADA Accessible Routes & DEIR Part 2, Sec. 3.4.7.3 a, Project Description, Parking, Proposed Parking Changes, Fig. 3-32, Proposed Pedestrian Circulation	Figures 3-19 shows no ADA access along El Prado through the Plaza de California, implying that one must use the Centennial Bridge for access to the Central Mesa area. Figure 3-32 shows no general (non-ADA) access along that route. Is that intended?
DEIR Part 2, Sec. 3.4.6.2, Project Description, Rooftop Park	Balboa Park already has a Visitor Center. Are there to be two? What are the benefits and impacts of one versus two or one versus the other?
DEIR Part 2, Sec. 3.4.6.2, Project Description, Rooftop Park & Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Parking Structure, Rooftop Park and Tram	Elaboration and illustration of the Visitor Center is needed to appraise its visual impact and architectural/historical appropriateness for the Park.
DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park	Please provide further details on the food service anticipated at the Visitor Center. It is said to include park user related services, beverages, and snacks. Please compare this quantitatively with bar or with restaurant service. That is, patron capacity, kitchen staffing, hours open, inclusion of table service, <i>etc.</i>
DEIR Part 2, Sec. 3.4.6.2 Project Description, Rooftop Park	<p>The size of the new public restroom is given in floor area. It should be compared to the restroom it replaces (the 1990s restroom being removed near the International Cottages). The area of the old restroom is needed for such a comparison, and the comparison would be even more useful if given in restroom capacity in numbers of simultaneous users.</p> <p>Further comparison should be made to the distance to the closest restrooms under the existing and proposed layouts for patrons of the Organ Pavilion and for visitors to the International Cottages. Please comment on the changed layout given that during intermissions at the most popular summer organ concerts the existing restroom is significantly inadequate.</p>



<p>DEIR Part 2, Sec. 3.4.6.3, Project Description, Tram, Fig. 3-29 &amp; Appendix D-2, Parking Demand Study, Proposed Tram Vehicle, Fig. 15 &amp; Appendix H, Greenhouse Gas Emissions Analysis</p>	<p>It appears that a tram design has been selected, according to the text and Figure 3-29, Example of Proposed Tram. According to Appendix D-2, Figure 15, Proposed Tram Vehicle, these will be fossil fuel-powered (gasoline, diesel or liquid propane, according to the text in the figure). Environmental impacts would seem to be minimized if such trams were to be electric battery-powered. Has this been considered? If not, it should be evaluated. Several manufacturers of electric passenger busses have commercial offerings (examples: <a href="http://www.zondausa.com">www.zondausa.com</a>, <a href="http://www.tecnobus.it">www.tecnobus.it</a>)</p> <p>It says in Section 3.4.6.2 that the 1915 trams consisted of small tractors pulling trailers with back-to-back benches. The historical record also describes smaller battery-powered, apparently wicker basket-like vehicles (see Appendix C, Centennial Bridge Photographic Survey, Photo Location 17, Historic Photo). Therefore, making the trams electric battery-powered would have historic precedent.</p> <p>Appendix H on greenhouse gasses does not discuss emissions related to the tram. The emissions from tram options other than the chosen fossil-fuel vehicle should be quantitatively compared.</p>
<p>DEIR Part 3, Sec. 4.1.3.1, part B, Environmental Analysis, Land Use, Impacts, Plan Consistency, Consistency with the Balboa Park Master Plan, Table 4.1-2 &amp; DEIR Part 3, Sec. 4.1.3.1, part C, Environmental Analysis, Land Use, Impacts, Plan Consistency, Consistency with the Central Mesa Precise Plan, Table 4.1-3</p>	<p>Both the Balboa Park Master Plan of 1989 and the Central Mesa Precise Plan of 1992 call for an Organ Pavilion parking lot to provide between 1,000 and 1,500 spaces. The tables say this project's parking structure would be approximately 202 spaces short of the minimum number. Furthermore, it would be only 39% of the desired maximum. The EIR says that to accommodate 1,000 spaces, a fourth subterranean level would be required. The depth of this level would pose substantial engineering constraints, including shoring, mechanical ventilation, and special fire protection parameters. Accommodation of the full 1,500 is not addressed.</p> <p>A) In consideration of the goals of the two Plans, this deviation requires further justification. Quantitative tables of cost – benefit (<i>i.e.</i>- parking spaces) should be provided.</p> <p>B) There should be at least discussion, if not alternative analysis, of the option to build a parking structure that would later be expandable to 1,000 or 1,500 spaces.</p>
<p>DEIR Part 3, Sec. 4.4.4.1.b Environmental Analysis, Transportation/Circulation and Parking, Operation Impacts</p>	<p>The comparison of the proposed paid parking structure with the recently constructed underground parking in Golden Gate Park is illegitimate insofar as public acceptance of parking fees and projected garage utilization. This is because the underground parking in Golden Gate Park is located immediately between the two museums (Academy of Sciences and de Young Museum) that attract the users. The garage and the two museums are even connected underground, providing the most direct access and</p>

	<p>weather protection when needed. This weighs heavily in the reported by the San Francisco garage's operator in the EIR. By comparison the proposed Balboa Park parking structure is a significant outdoor walking distance from any of the museums and similar attractions it supposedly will serve.</p>
<p>DEIR Part 3, Sec. 4.1.2.1, part C, Environmental Analysis, Land Use, Impacts, ESL Regulations, Fig 4.1-9, ESL Slope Impact Exhibit &amp; Appendix B-1, Sec. VIII, part A., Historic Resources Technical Report, Evaluation of Project-specific Impacts, Project Description, Alcazar Parking Lot and Walkway</p>	<p>Please provide elevation diagrams or graphics to explain the re-contouring of the Alcazar Parking Lot, particularly the grading and retaining walls, as described in Appendix B-1: Some new grading would occur along the north rim of Palm Canyon ... and sections of the western and southern edges of Alcazar Parking Lot would require the construction of retaining walls. Retaining walls constructed on the west side of the parking lot (facing Cabrillo Canyon) would range from 20' to 28' high. Section 4.1.2.1 and Figure 4.1-9 only identify qualifying "steep slopes".</p>
<p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p>	<p>For each of these alternatives a reason for rejection is that the alternative would not meet Objective 6 - complete implementation by 2015. The desire to finish by the time of the Panama-California Exposition centennial is understood. However, this is an inappropriate criterion for evaluation of environmental impact. (Quite the contrary to assigning benefit to an alternative appearing to meet Objective 6, overly accelerated construction could have negative environmental impacts.)</p>
<p>DEIR Part 4, Sec. 9.2, Project Alternatives, Alternatives Considered but Rejected</p>	<p>Why was an Archery Canyon parking structure not considered?</p>
<p>Sec. 9.2.5, Project Alternatives, Alternatives Considered but Rejected, Quince Street Access Alternative</p>	<p>This alternative was not considered for further analysis due to the increased scope of improvements, requirement for excessive retaining walls and extent of grading operations and landform alteration.</p> <p>A. Since this proposal has been seriously considered in the past (Balboa Park Development and Management Plan, Pekarek Group, 1983), and since the San Diego Zoo has numerous roads in the same terrain that did not require such retaining walls as this rejected alternative, there is a question about the assumptions concerning the roadway engineering. Is the road design a standard, fully conforming roadway (sidewalks, bike lanes) or a more "park-like" road?</p> <p>B. In the same context, would the retaining walls, grading operations and landform alteration be significantly lower and even acceptable if the Quince Street access were one-way (eastbound) into the Park?</p>

DEIR Part 4, Sec. 9.2.6, Project Alternatives, Alternatives Considered but Rejected, Old Globe Way Parking Structure Alternative	This alternative was not considered for further analysis due to creating a bottleneck during peak arrival/exit times. (This is presumed to apply principally to the Old Globe Theater productions.) There should be more detailed justification for this assertion concerning the Old Globe Way Parking Structure alternative compared to the proposed Organ Pavilion parking structure and the Centennial roadway. Will they both not experience bottlenecks during peak arrival/exit times? (In the case of the Organ Pavilion parking structure more so with respect to events at the Organ Pavilion.)
DEIR Part 4, Sec. 9.2.8, Project Alternatives, Alternatives Considered but Rejected, Sixth Avenue Bridge Extension	This alternative is said to have an unacceptable visual impact because of the need to construct a new bridge over SR-163, which is a Scenic Highway Corridor. This incorrectly assumes that the visual impacts will be negative. To be fair, any such conclusion requires more details about the design of the new bridge.
DEIR Part 4, Sec. 9.3.2.2.a.Issue 2, Project Alternatives, Alternatives Fully Analyzed, No Project/Central Mesa Precise Plan Alternative, Environmental Analysis of the Central Mesa Precise Plan Alternative, Land Use, Plan Consistency & Table 9-1, Comparison of Project and Alternatives Impacts Summary	It is not reasonable that the Central Mesa Precise Plan alternative is considered other than fully in conformance under Plan Consistency. It is the current adopted plan, is it not?
DEIR Part 4, Sec. 9.3.3A.2.a.Issue 4, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Environmental Analysis of the No New Parking Structure Alternative, Land Use, San Diego International Airport ALUCP Compatibility & Table 9-1, Comparison of Project and Alternatives Impacts Summary	It is unreasonable that this alternative would be inconsistent with the SDIA ALUCP, since it is obvious that there would be no impacts if there are no new structures or parking areas.
DEIR Part 4, Sec. 9.3.3A.3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized	It is concluded that this alternative would have greater traffic impacts compared to the reference project and other alternatives. This appears to be true, but it should be noted that these impacts are almost entirely at intersections outside the Park. Thus the

<p><b>Alternatives, Conclusion Regarding the No New Parking Structure Alternative &amp; Table 9-1, Comparison of Project and Alternatives Impacts Summary</b></p>	<p>impact on Park environment and user experience in the Park will be negligible.</p>
<p><b>DEIR Part 4, 9.3.3D.1, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Description of the Inspiration Point Parking Structure Alternative &amp; DEIR Part 4, 9.3.3D.2.d.Issue 3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Environmental Analysis of the Inspiration Point Parking Structure Alternative, Transportation/Circulation and Parking, Parking</b></p>	<p>A. There does not seem to be a basis for the sizing of the Inspiration Point Parking Structure. An observation is that there is space for a larger parking structure at Inspiration Point than at the Organ Pavilion, and so there needs to be justification why the size is the same as the proposed Organ Pavilion underground structure.</p> <p>B. A more useful analysis would be comparison of an above-ground Inspiration Point with the subterranean Organ Pavilion parking structure where the number of parking spaces would be determined for each of the two on the basis of the same total structure cost, or based on the actual capacity for each site.</p>
<p><b>DEIR Part 4, 9.3.4Bi.3, Project Alternatives, Alternatives Fully Analyzed, Cabrillo Bridge Pedestrianized Alternatives, Conclusion Regarding the Tunnel Alternative &amp; Table 9-1, Comparison of Project and Alternatives Impacts Summary</b></p>	<p>The summary comparison of this Tunnel alternative ascribes as negative factors that it would not remove vehicles from El Prado or Plaza de California (portion of Objective 1), or restore pedestrian and park uses to El Prado and Plaza de California (portion of Objective 2). However, this alternative would go a long way towards those goals for the Plaza de Panama, and an open, pedestrian-friendly Plaza de Panama is the centerpiece of the whole project. This is a glass half-empty, half-full situation. The negative tone of this conclusion should be tempered.</p>
<p><b>Appendix D-1, Balboa Park Plaza De Panama Circulation &amp; Parking Structure Project Traffic Analysis, Pedestrianize Cabrillo Bridge Alternatives &amp; Tables 195, 196, 197 &amp; 198 Mitigation Summaries</b></p>	<p>The analyses which conclude that there will be significant traffic impacts on Sixth Avenue are faulty if they do not address the traffic patterns of drivers from Interstate 5. Those arrive today using the Laurel Street exit anticipate use of Cabrillo Bridge. They will not approach the Park from the west when they know Cabrillo Bridge is closed to autos.</p>

<p><b>TRANSPORTATION, CIRCULATION &amp; PARKING</b>  (Part 1, Conclusions, p.6, 8)  (Part 3, Section 4.4, pp. 197-251)  (Appendices D-1, D-2, D-3)</p> <ol style="list-style-type: none"> <li>1. DEIR Part 1, Conclusions, p.6, states that the proposed project will create significant but mitigable impacts on transportation, circulation and parking.</li> <li>2. "The project would not add any traffic to external roadways or redistribute external traffic."</li> <li>3. "... in 2030, when future traffic levels are greater due to growth in the region, one internal intersection (Presidents Way/Centennial Road) would operate at unacceptable levels due to the project rerouting traffic through that intersection. This impact would be potentially significant."</li> </ol>	<p><b>COMMENT:</b> With an indisputable list of non-mitigable impacts relative to both City planning documents and Secretary of the Interior Standards, the proposed project places higher value on the private automobile over aesthetics and the tangible and intangible values of a National Landmark designation.</p> <p><b>QUESTION:</b> Where will the parking behind the Organ Pavilion be accommodated during construction? The parking from the Alcazar lot?</p> <p><b>QUESTION:</b> If the Project would not add traffic to external roadways, why does the DEIR do such exhaustive analyses of external roads and intersections, extending to downtown (A Street) and Robinson @ Sixth and @ Park Blvd.?</p> <p><b>QUESTION:</b> Won't the 2030 traffic increase projections occur with or without the proposed project? Why analyses of other intersections beyond the President's Way / Centennial Road impacts? The differences, in some cases, are minimal.</p> <p><b>QUESTION:</b> Are the scale and costs of changes acceptable? What about the impacts on Visual Effects/ Neighborhood Character with intensification of traffic on neighboring streets &amp; intersections, and major changes at intersections? At what point do we cease accommodating more &amp; more vehicles vs. providing improved public transportation choices for accessing the park?</p> <p><b>COMMENT:</b> The numerous roadway improvements and intersection changes analyzed in addition to those directly attributed to the project would be City of San Diego costs, unrelated to the proposed plan, if #2 in the left column is a correct statement.</p>
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