

DAVID E. WATSON
DIRECT DIAL: +1 619 744 2289
PERSONAL FAX: +1 619 923 2508
E-MAIL: dewatson@duanemorris.com

www.duanemorris.com

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VIA E-MAIL: DSDEAS@sandiego.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:

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.

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

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.

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.**

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.**
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.
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

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**.
10. The DEIR does not present a parking supply and demand (visitors, employees, volunteers, construction crew etc.) for each construction phase.

Alternatives Considered But Rejected (Pages 18 to 27 of DEIR)

2004 Jones and Jones Land Use, Circulation and Parking Study Alternative

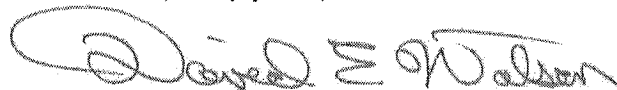
11. The DEIR identifies the 2004 Jones and Jones Land Use, Circulation and Parking Study Alternative as rejected because of location of parking at the periphery. The proposed parking at the periphery locations did not meet objective 1 – “maintaining proximate vehicular access to Park’s institutions”. **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?**
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

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?**

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