



## NORTH PARK PLANNING COMMITTEE

[northparkplanning.org](http://northparkplanning.org)

Like us:  [NorthParkPlanning](https://www.facebook.com/NorthParkPlanning) Follow us:  [@NPPlanning](https://twitter.com/NPPlanning)

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

Subject: Comments on Draft EIR for the Balboa Park Plaza de Panama Project  
Project No. 233958/SCH No. 211031074

March 22, 2012

Dear, Ms. Shearer-Nguyen

Attached please find individual comments from members of the North Park Planning Committee on the Draft Environmental Impact Report for the Balboa Park Plaza de Panama Project.

Sincerely,

A handwritten signature in black ink, appearing to read "René Vidales", written over a horizontal line.

René Vidales, Vice Chair  
North Park Planning Committee

## Comments from Members of the North Park Planning Committee on the Balboa Park Plaza de Panama, Circulation & Parking Structure Project DEIR

1. Executive Summary, Table S-1, Summary of Significant Environmental Analysis Results, Page Number S-43, Truck Hauling Noise impact: Impacts from Truck Hauling Noise are not less than significant because they were not analyzed adjacent to the Speckles Pavilion, which is a venue for live events, some of which occur during the week. The project proposes approximately 163,000 cubic yards of cut and 21,000 cubic yards of fill, with approximately 142,000 cubic yards of export material, as stated in Page 4.3-46. At 10 cubic yards per hauling truck, this would result in 14,200 truck trips during the construction of the Parking Structure. Although the noise levels were analyzed at residences adjacent to the haul route, the noise levels from hauling trucks adjacent to Speckles Pavilion need to be analyzed in accordance with the **Noise Element of the General Plan** and incorporated into the Noise Study in order to determine the impacts on the Speckles Pavilion during live events.
2. Executive Summary, Table S-2, Comparison of Project and Alternatives Impacts Summary, the following impact was not disclosed: The implementation of paid parking in a public park is in direct conflict with the **Recreation Element of the General Plan**, Policy RE-ID.1 "Provide new and upgraded park and recreation facilities that employ barrier-free design principles that make them accessible to San Diegans regardless of age or physical ability, giving priority to economically disadvantaged communities". The implementation of paid parking is also in direct conflict with the **Balboa Park Central Mesa Precise Plan (CMPP)**, Land Use, Recommendations, Page 172, "Discourage park uses and policies that restrict free public use of the Park, while allowing consideration of paid parking to cover parking structure construction and maintenance, and operation of the parking structure and tram system from the Palisades to the Plaza de Panama" (Amendment shown underlined). The CMPP proposed amendment's recommendations are contradictory because they implement paid parking while discouraging park uses and policies that restrict free public use of the park. The implementation of paid parking on a public park puts a burden on the disadvantaged and lowers their standard of living, and is in direct conflict with the **Economic Prosperity Element of the General Plan**, which states its purpose is "To increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy". When paid parking is added in one location, it will have the domino effect of paid parking in the rest of the park. The public has not been adequately made aware of this effect. NPPC knows from our experience, with the North Park parking structure, that the majority of people will still look for free parking. The implementation of paid parking will cause increased traffic in park-adjacent neighborhoods, primarily Bankers Hill/Park West as individuals look for free parking of which there is very little. This scenario is discussed in Appendix D-1, Traffic Impact Study, Page 53, second paragraph in the EIR stating that about 50 displaced cars would end up parking on Balboa Drive and not in the Bankers Hill/Park West area. A more detailed technical analysis of this impact should be conducted and made available for public review.
3. Traffic Impact Study, Proposed Project Traffic Generation, the following impacts were not analyzed and therefore were not disclosed: The Traffic Impact Study (Page 341) shows a net gain of 273 parking spaces. The Traffic Impact Study (Page 44, Proposed Project Traffic Generation) states that *"the proposed project traffic volumes are the same as the no project condition. The project would not generate traffic, as proposed parking and roadways would not attract additional visitors to the park. The proposed project does not propose to alter the general external trip distribution patterns within the study area"*. By implementing a parking structure, the study area is generating traffic because the parking structure itself is a traffic generator. There are numerous ways to calculate traffic generation from implementing a parking structure:

- SANDAG and City of San Diego criteria using Park and Ride Lots based on paved surface:  
The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region ([http://www.sandag.org/uploads/publicationid/publicationid\\_1140\\_5044.pdf](http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf)) and the Trip Generation Manual within the Land Development Manual within the San Diego Municipal Code (<http://www.sandiego.gov/planning/pdf/tripmanual.pdf>) show that a Park & Ride Lot similar to a parking structure would generate from 400 ADT per acre to 600 ADT per paved acre. If the proposed parking structure measures 476' x 191' and it has 3 levels, this would amount to 6.26 acres; at 600 ADT/paved acres the traffic generation would amount to **3,757 ADT**.
- SANDAG criterion using Park and Ride Lots based on the number of parking spaces:  
The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region ([http://www.sandag.org/uploads/publicationid/publicationid\\_1140\\_5044.pdf](http://www.sandag.org/uploads/publicationid/publicationid_1140_5044.pdf)) shows that a Park & Ride Lot similar to a parking structure would generate from 5 ADT to 8 ADT per parking space. Applying the higher value of 8 ADT per parking space to the net gain of 431 parking spaces in the Organ Pavilion Parking Structure (798 proposed minus 367 existing) it amounts to **3,448 ADT**.
- Parking occupancy factors criterion:  
The traffic generation due to an increase in parking provided can also be developed on assumptions used for the parking structure queuing analysis; the percentage of the parking spaces assumed that will be occupied during peak conditions can be applied and a peak occupancy factor with a percentage can also be assumed to represent the maximum number of vehicles anticipated to enter or exit the parking structure during peak conditions. This criterion would also give a high number in ADT that was not considered in the traffic impact study.

Therefore, the traffic generation from the parking structure itself needs to be part of the analysis included in the Traffic Impact Study, the traffic generation ADTs disclosed, and the impacts and mitigation need to be updated in the Traffic Impact Study and the EIR. The addition of ADTs creates a re-distribution in traffic patterns onsite and offsite. The EIR is deficient because it has not disclosed and analyzed the impacts by the additional ADTs due to the parking structure.

4. Traffic Impact Study and Site Development Plans, Site Development Plans sheets 2, 3, and 4; Traffic Impact Study Table 19, Traffic Safety not analyzed based on proposed road geometry and Level of Service (LOS). The following impacts were not analyzed, therefore they were not disclosed:

Sheets 2, 3, and 4 of the Site Development plans show Centennial Bridge (south of El Prado) and Centennial Road (north of Presidents Way) with sharp horizontal curves. Centennial Bridge has a radius of 180' and Centennial Road has radii of 102', 130', and 83' in different segments. A Public Residential Local Street in the City of San Diego has the requirements of a 100' minimum horizontal curve radius.

A Rural Local Road in the City of San Diego has the requirements of a 300' minimum horizontal curve radius.

Centennial Bridge and Centennial Road do not meet the City standards from the **Street Design Manual** based on horizontal curve radii requirements.

The Traffic Impact Study, Table 19, Existing +Project, Roadway Segment Analysis (Weekday) shows that for a 2-Lane Park road the proposed LOS E Capacity is 10,000 ADT.

Segment 29 (Centennial Bridge south of El Prado) shows 5,710 ADT and a LOS C.

Segment 30, (Centennial Road north of Presidents Way) shows 7,020 ADT and a LOS C.

A Public Residential Local Street in the City of San Diego has the requirements of a design ADT of 1,500.

A Rural Local Road in the City of San Diego has the requirements of a design ADT of 1,500.

Centennial Bridge and Centennial Road do not meet the City standards from the **Street Design Manual** based on design ADT.

The Traffic Impact Study does not include a Table for Saturday/Weekend Existing + Project table. Since no table was provided, the Saturday/Weekend ADT for Centennial Bridge and Centennial Road cannot be compared with the requirements of a Public Residential Local Street or a Public Rural Local Road.

5. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure. The trend that is currently being applied to urban parks and historic districts is to pedestrianize those areas. According to a report published by the Center for City Park Excellence/ Trust for Public Land, *"Of the 10,000 or more miles of urban park roads in the U.S., the vast majority are still devoted primarily to automobiles. But a survey of big cities by the Center for City Park Excellence in 2007 found that at least 22 park drives, totaling more than 40 miles, have been closed to cars either all or part of the time."*

The report goes on to state that *"The single most significant—and unexpected—fact is that an automobile ban increases rather than decreases the number of persons using a park. A study of Golden Gate Park conducted in 2006 by the city of San Francisco showed a 116 percent in park visitors on Sundays (when John F. Kennedy Drive is closed to cars) than on Saturdays (when the roadway is not restricted)"*. (Report is available online: Proceed Without Caution: City Parks Are Closing Their Roads to Cars, July 2008)

Furthermore, European cities with great tourism appeal practice "managed traffic" or allow no traffic at all in the historical core, and none of them offer alternative access with a tram or shuttle. An excellent example is Siena, Italy, one of many historic cities where the visitor must park well outside the old city and walk a considerable distance to enter the historic core.

The Balboa Park Plaza de Panama Project adds more roads within the core of the park than it actually closes.

6. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, therefore the Balboa Park Plaza de Panama Project does not comply with General Plan, Mobility Element Policy ME.B.1: *"Work closely with regional agencies and others to increase transit ridership and mode share through increased transit service accessibility, frequency, connectivity, and availability"*.
7. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.B.2:

*“Support the provision of higher-frequency transit service and capital investments to benefit higher-density residential or mixed-use areas, higher-intensity employment areas and activity centers, and community plan-identified neighborhood, community and urban villages, and transit-oriented development areas.”*

8. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure and it also does not provide exclusive bike lanes on the new roads, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy M.E.B.6: *“Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate”.*
9. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure and it also does not provide exclusive bike lanes on the new roads, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.F.4: *“Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility users.”*
10. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.1: *“Provide and manage parking so that it is reasonably available when and where it is needed”.*
11. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure, which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.2: *“Implement innovative and up-to-date parking regulations that address the vehicular and bicycle parking needs generated by development”.*
12. The Balboa Park Plaza de Panama Project encourages the use of automobiles to get to the park and adds additional roads to get to the parking structure which introduces paid parking and does not provide for parking management, therefore the Balboa Park Plaza de Panama Project does not comply with the General Plan, Mobility Element Policy ME.G.5: *“Implement parking strategies that are designed to help reduce the number and length of automobile trips. Reduces automobile trips would lessen traffic and air quality impacts, including greenhouse gas emissions”.*
13. The Balboa Park Plaza de Panama Project encourages the use of automobile and automobile dependency by adding new roads without designated bicycle lanes and taking all the automobiles to the core of the park. The project does not provide or encourage alternative forms of transportation.

Conventional planning tends to evaluate transportation primarily in terms of mobility, particularly motor vehicle mobility, ignoring tradeoffs with other forms of accessibility. For

example, conventional planning recognizes that road expansion improves automobile accessibility, but generally ignores the negative impact this tends to have on non-motorized accessibility (wide roads with high traffic volumes and speeds are difficult for pedestrians and cyclists to cross). Since most transit trips involve walking links, road widening can also reduce transit accessibility. Road widening also tends to stimulate sprawl, which reduces overall land use accessibility, increasing the amount of travel needed to reach destinations, further reducing accessibility by alternative modes.

These practices tend to create automobile dependency, that is, transportation and land use patterns that favor automobile travel over other modes. The opposite of automobile dependency is not a total lack of private vehicles, but rather, it is a multi-modal transport system, meaning that consumers have various transportation options from which to choose (walking, cycling, ridesharing, public transit, telework, etc.) and incentives to use each for what it does best.

14. Section 8.2, Effects Found Not To Be Significant-Special Events, the following impacts were not analyzed, and therefore were not disclosed: This is not an adequate analysis of potential impacts on important City recreational facilities during construction and after completion of the proposed project. Missing is an analysis of impacts to special events such as December Nights, Rock N' Roll Marathon, America's Finest City Half Marathon, and Earth Fair during the two years of project construction. Any of these events, some of which have been held consecutively for 34 years can be held during construction.
15. Executive Summary, Table S-1, Summary of Significant Environmental Analysis Results, Page S-43, b. Truck Hauling Noise, Noise levels at residences located adjacent to the haul and delivery route would not exceed the construction noise limit of 75 dBA. Additionally, noise levels would not exceed the noise ordinance limits shown in Table 4.12-3. Noise impacts due to truck hauling and deliveries would be less than significant: Impacts from Truck Hauling Noise are not less than significant because they were not analyzed adjacent as offsite impacts during construction and after project completion on Morley Field recreational facilities due to disposal of soil excavated for construction of the parking garage. Facilities potentially impacted include the Morley Field archery range, hiking trails, Florida Canyon trail connections, the Frisbee golf course, baseball fields, and play fields; activities potentially impacted include Little League, soccer, San Diego City College baseball games and practice, Velodrome races, and nationally prominent cross country races and tennis tournaments.
16. Section 3.4.7.3c, Staff and Employee Parking, The Draft EIR states "Currently, staff and employees utilize over 550 of the most centrally located parking spaces". Table 3-1 in Section 3.4.7.3 presents a combined total of 557 spaces in the Plaza de Panama, Alcazar, and Organ Pavilion parking lots. The EIR can be interpreted to state that all but 7 of the 557 spaces available at the parking lots directly affected by the Project are utilized by staff and employees, and trying to justify the need for a parking structure that can be avoided by implementing parking management, and therefore the project does not comply with the General Plan, Mobility Element Policy ME.G.1: "Provide and manage parking so that it is reasonably available when and where it is needed".
17. Section 3.4.7.3, Parking, The Draft EIR states repeatedly that the Project does not plan to implement an employee parking management plan. But based on the information presented in Section 3.4.7.3, employee parking management would be more effective than the proposed parking structure in enhancing proximate parking for visitors. All that would be needed is an

active plan to assure that employees park in the more remote lots instead of the existing Organ Pavilion lot, which has 357 standard spaces and 10 ADA spaces. The "passive" form of employee parking management anticipated to occur by converting free parking to paid parking in a structure is an expensive, impactful, and ineffective way to achieve Project objectives. The objective of maintaining public and proximate vehicular access to the institutions on the Central Mesa while removing vehicles and improving access to the Central Mesa through the provision of additional parking [for visitors] can be achieved without a paid parking structure. The Draft EIR should disclose why an employee parking management plan is not part of the project. Therefore, the Project does not comply with the General Plan, Mobility Element Policy ME.G.1: "Provide and manage parking so that it is reasonably available when and where it is needed".

18. The Draft EIR should disclose a reasonable estimate of construction costs for the parking structure. Otherwise, the decision makers and the public cannot evaluate the feasibility of constructing a self-sustaining paid parking structure. Parking structures can be an extremely expensive way to provide parking spaces. A typically cited parking structure cost is \$20,000 per space, with the caveat that undergrounding parking structures can be twice to three times typical values. At \$20,000 per space, the proposed structure would cost nearly \$16 million. A 2008 presentation on parking structure costs at UCSD listed the cost of the 800-space University Center Parking Structure at \$27.1 million, or \$33,875 per space. At that price per space, the parking structure for the Project would cost more than \$27 million. Estimating the cost of the parking structure would involve some forecasting, but CEQA Guidelines Section 15144 states that *"While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can"*.
19. Traffic, Circulation and Parking, Section 4.4.1.4: The Draft EIR states that *"Considering the total amount of employees parking at the Central Mesa is about 500, employees displace up to 4,000 visitors per day from prime parking spaces"*. If this is the case, if the employee parking issue were resolved there would not be a need for additional parking. If this is the case, any of the parking being eliminated in the Plaza de Panama and Alcazar lots would not need to be replaced.
20. Traffic, Circulation and Parking, Table 4.4-4: Table 4.4-4 in the Draft EIR presents existing parking conditions in terms of spaces occupied and percentage utilization. Under existing weekday conditions, 50 spaces are occupied at the Plaza de Panama lot, 136 are occupied at the Alcazar lot, and 348 are occupied at the Organ Pavilion lot. Assuming all of these parkers would use the parking structure of 798 spaces, the occupancy of the structure would be 67%, far below the 88% assumed by the parking consultant to estimate net annual parking revenue. This simple calculation does not take into account employee parking patterns and the fact that some ADA spaces would still be available at the Alcazar lot. The Draft EIR should provide an analysis of reasonably achievable parking structure occupancy with the values presented in Table 4.4-4. Such analysis is critical to determining if the objective of having a self-sustaining paid parking structure that provides funds for maintenance, the planned tram operations, and the debt service on the structure can be met by this component of the project.
21. Traffic, Circulation and Parking, Section 4.4.4.1, Impacts: The discussion on parking impacts references a paid parking structure in San Francisco to justify the contention that the proposed parking structure would have a high utilization and that parking fees would not be a deterrent to maintaining high occupancy levels. The Draft EIR should not be referencing a structure in another city when an example is nearby at University Avenue and 29th Street in the San Diego community of North Park. The response of drivers to this local parking structure that only

charges \$5 should be explored and cited in the Draft EIR. Word "on the street" is that the North Park structure is not highly utilized and drivers continue to prefer free parking available in the surrounding commercial and residential area.

22. Traffic, Circulation and Parking, Section 4.4.4.1, Impacts, the following impact was not analyzed, and therefore it was not disclosed: This section does not explore future parking scenarios that could occur with construction of the parking structure. One scenario is that there is too much free parking available in the surrounding area to generate adequate occupancy in the parking structure and create a self-sustaining facility. It is likely that the City would then make other lots paid also. Since this is a City project, such analysis would not be speculative.
23. Traffic, Circulation and Parking, Section 4.4.4.1, Impacts, the following impact was not analyzed, and therefore it was not disclosed: This section does not explore the Zoological Society's likely response to creation of paid parking in the Central Mesa. According to Table 4.4-4, the zoo parking lot is 93% utilized during the week and 100% utilized on the weekend. The Zoological Society may determine that they must protect parking availability at the zoo lot. The changes that would occur to parking patterns and affordability of Balboa Park for all citizens of San Diego if the nearly 3,000 spaces at the zoo became paid parking needs to be analyzed and disclosed as offsite impacts. These questions can be addressed without speculation and should be answered in the Draft EIR.
24. No New Parking Structure Alternative, Table 9-1: The conclusion of Issue n-1: Public Facilities/Road Maintenance are incomplete. The No New Parking Structure Alternative would generate fewer new maintenance obligations for the City because a parking structure would not be built. In addition, recently repaved roadways along the proposed haul route would not be impacted by construction because no soil would have to be excavated and hauled in the East Mesa. Therefore, the No New Parking Structure Alternative would have less public services and facilities impacts than the Project. Table 9-1 should be corrected.
25. Environmentally Superior Alternative, Section 9-4: This section discusses the Environmentally Superior Alternative. The selection of the Half-Plaza Alternative as the environmentally superior alternative is not supported by the alternative impacts summary in Table 9-1 of the Draft EIR.
26. Environmentally Superior Alternative, Section 9-4: This Section of the Draft EIR should state clearly if either of the No Project alternatives are considered environmentally superior. These would be the No Development/Existing Conditions Alternative and the Central Mesa Precise Plan Alternative.
27. Environmentally Superior Alternative, Section 9-4: If any of the No Project alternatives is environmentally superior, then the Draft EIR should identify the environmentally superior alternative among the "build" alternatives in accordance with CEQA 15126.6(e)(2). The evaluation should focus on which alternative best reduces environmental impacts caused by the Project (particularly the impacts that are significant and unmitigable).
28. Environmentally Superior Alternative, Section 9-4: The Phased Alternative is the same as the Project, so should be excluded from being considered as the environmentally superior alternative.
29. Environmentally Superior Alternative, Section 9-4: The following should be included in the comparison of traffic capacity impacts: of the nine roadway segments that are projected to



operate poorly (meaning at level of service (LOS) E or F) in 2030 without the Project, seven segments also would operate poorly with the Project, one segment would be eliminated by the Project (the Mall south of El Prado), and one would be improved by becoming a different segment of the Project (President's Way east of Pan American Road). A new road segment created by the Project, Centennial Bridge south of El Prado, is projected to operate at LOS F in 2030. The Modified Precise Plan without Parking Structure alternative is projected to worsen street segment operations at only one location in 2030, the Mall south of El Prado within the park. The other three candidate alternatives are projected to worsen street segment operation significantly at four locations outside of the park in 2030 due to traffic rerouting; two segments for each alternative also are projected to operate poorly with the Project and two are not.

30. Environmentally Superior Alternative, Section 9-4: The following should be included in the comparison of traffic capacity impacts: the five intersections that would operate poorly in 2030 without the Project also would operate poorly with the Project. One intersection, Park Boulevard/Space Theatre Way, could have improved operations with installation of a traffic signal, which would mitigate impacts from the No New Parking Structure and Inspiration Point Parking Structure alternatives that affect this intersection. (This impact is incorrectly identified as unmitigable in the Draft EIR.) The no New Parking Structure Alternative would not have any other intersection impacts in 2030 identified as significant and unmitigable. The Inspiration Point Parking Structure Alternative would have one additional intersection impact identified as significant and unmitigable in 2030, the Stop Light (One Way) Alternative would have none, and the Modified Precise Plan Parking Structure Alternative would have one.
31. Environmentally Superior Alternative, Section 9-4: The No New Parking Structure, Inspiration Point Parking Structure, Stop Light (One-Way), and Modified Precise Plan without Parking Structure alternatives perform the best at reducing Project impacts. These alternatives should be the candidates for the environmentally superior alternative and discussed in more detail in Section 9.4 of the Draft EIR.
32. Environmentally Superior Alternative, Section 9-4: The DRAFT EIR could apply a simple, quantified screening analysis using the comparison of impacts in Table 9-1 to develop a more objective evaluation than presented in Section 9.4. An accurate and objective comparison of the Project and alternatives is critical because the City has a duty to avoid or minimize environmental damage where feasible in accordance with CEQA Guidelines Section 15021, which notes in part: *"(1) In regulating public or private activities, agencies are required to give major consideration to preventing environmental damage. (2) A public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment."*
33. Under the "Inspiration Point parking lot" scenario, why was the assessment of this option addressed/considered only when paired with a closing of the Cabrillo Bridge. This does not independently nor comprehensively evaluate this parking structure alternative. If the Cabrillo Bridge were open to traffic it is fair to assume that with a large new parking resource at inspiration point, not only are the 57 spaces removed from the Plaza de Panama recouped, (this removal being the supposed focus of this amendment effort), but the public in general and certainly the 80% of travelers coming from outside of the local area would be aware of this new large parking resource and accompanying access into the park. This could intuitively be argued to reduce further the amount of traffic coming into the park across the Cabrillo Bridge and through the southwest corner of the Plaza de

Panama thus reducing further the predicted pedestrian conflict in the Plaza all the while avoiding concerns about historic impacts to the Cabrillo Bridge/buildings or Alcazar Garden with the Bypass Bridge.

34. Why did the "no alternative option" not recognize and include the obvious advantage of assuring that planning options remain available in the future on the west side of the park to be able address both near and long term transit mode changes, facilitate the ability to incorporate different modes in the future and ability to better correspond with not only SANDAG 2050 planning models but locally considered transit and modal changes for streets such as 5th and 6th avenue on the west side of the park.
  35. Under the assessment of the "Proposed Project Alternative" un-mitigable impacts associated with the bypass bridge, there was no recognition or even discussion of such concerns as the new auto bridge rendering the future of altering or modifying the use of the Cabrillo Bridge, (i.e. to mixed modal, closed to auto-oriented use, etc.), impossible. Given the cost of building the bridge, it being a permanent structure with little other use, and the auto-intensive use it vests on the bridge makes in reality even near term (10-15 year) changes in public transit sentiments and uses as well as city planning shifts in focus of modal changes on the bridge impossible. How can objective studies/arguments in support of the bridge disregard a discussion of whether the by-pass bridge memorializes auto use as the primary use of the Cabrillo Bridge in perpetuity? - That it cannot realistically be closed permanently to auto use or have used altered such to auto focus modal use upon pedestrian, bike, transit or a mix there-of.
- 

An overarching concern is the apparent dismissal of many years of expert study and community input that resulted in broad support for the BPMP/CMPP vision and goals. This highly inclusive process stands in stark contrast to the current shepherding of the proposed project-specific amendments' potential for irreversible damage to the park, San Diego's historic treasure. Most public meetings have focused on "after-the-fact" reports by applicant consultants, versus genuine "give and take" discussions. NPPC has not been part of any discussions related to proposed project alternatives.

The proposed project conflicts with two basic values of existing policies: 1) preservation of the park's historic assets; and 2) reduction of reliance on the automobile through integrated modes of alternative transportation within and connecting to the park. The proposed project introduces a massive, incompatible bypass bridge with the potential to permanently scar the grandeur of Balboa Park's historic entryway. The proposed bridge will carry automobiles to a centralized parking structure within the park's core, attracting even more vehicular traffic into the park. While an Organ Pavilion parking structure is allowed by existing plans, the structure was envisioned as only one element of a comprehensive traffic and parking management strategy that would include peripheral parking structures, public transit, shuttle systems, walking, and bicycling. *There is no need to build a new, permanent, auto-centric bridge to accommodate this vision.* Further, as park-related circulation planning has evolved around the globe, an effective best practice has become relocating parking spaces to a park's periphery, a strategy being applied to signature urban parks worldwide.

The city appears to be willing to compromise the park's vision based on the promise of private funding tied to an auto-centric plan. Yet what could be more apropos for the Balboa Park centennial celebration than the reinstatement of a streetcar system incorporating original Class 1 PCC streetcars that carried international visitors to the 1915 Panama-Cal Expo — as has been suggested?

This ill-thought-out project appears to be motivated by a misplaced sense of urgency to access private funding to meet 2015 centennial celebration deadlines at any cost, including placing general fund dollars at risk. NPPC views the proposed amendments as short-sighted, supporting a \$40 million “over-kill” approach to eliminating 54 parking spaces from the Plaza de Panama with a net gain of only 273 spaces.

There is a conflict created by the simultaneous rushing through of the plan amendments for this project and the EIR process. The proposed project's scope is so broad and fundamentally in opposition to the BPMP and CMPP that it triggers the need for a comprehensive Community Plan Update versus an amendment process. The concurrently occurring plan amendments for the proposed project have been so closely customized to the Plaza de Panama project that consideration of alternative projects has been effectively precluded. This project-specific approach to plan amendments creates a conflict with the EIR process, as well as a major constraint to future park enhancements if the “Plaza de Panama Circulation and Parking Structure” project does not go forward.

Proposed Plaza de Panama Project is inconsistent with city and regional plans related to Balboa Park land use, circulation, and parking. Relevant plans are listed below. Policy inconsistencies are discussed in following sections.

- **City of San Diego General Plan, 2008.**
- **Balboa Park Master Plan (BPMP), 1989**, Estrada Land Planning, Inc.; Amended 1997, Estrada Land Planning (Balboa Park Activity Center); Amended 1998, Marie Burke Lia, Attorney at Law (Natural History Museum expansion); Amended 2004, Austin Veum Robbins Partners (underground parking and Park Boulevard Promenade); Amended 2004 (Veterans Memorial Garden).
- **Balboa Park Central Mesa Precise Plan (CMPP), 1992**, Estrada Land Planning, Inc.; Amended 1998, Maria Burke Lia (Activity Center); amended 2002, Wheeler, Wimer, Blackman & Assoc. (West Prado Arcade); Amended 2004, MacLeod Consulting Services/Estrada Land Planning (Park Boulevard Parking Structure and Promenade).
- **Balboa Park Land Use, Circulation, and Parking Study, 2004**, Jones & Jones/Civitas Inc.
- **Parking Management Action Plan for Balboa Park Central Mesa & Inspiration Point, 2006**, Tilghman Group/Civitas Inc.
- **The Soul of San Diego: Keeping Balboa Park Magnificent in Its Second Century, 2008**, Trust for Public Land.
- **The Future of Balboa Park, 2008**, Balboa Park Committee.
- **SANDAG 2050 Regional Transportation Plan (RTP), 2011.**

## **COUNCIL-ADOPTED PLANS**

### **City of San Diego General Plan, Adopted 2008**

The proposed project conflicts with numerous general plan policies.

#### Historic Preservation Element

*This general plan element “guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources” and states “The protection of these resources and preservation of San Diego’s past for its current and future residents are essential components of San Diego’s historic preservation program.”*

The proposed project negatively impacts the following historic designations and listings:

- **El Prado Complex:** National Register of Historic Places (1976)
- **Balboa Park:** National Register Historic Landmark, National Historic Landmark District (1977)
- **Cabrillo Bridge:** National Register of Historic Places, contributing element to the state-designated Cabrillo Freeway (SR 163) Historic Resource (see below)
- **Cabrillo Freeway:** California Register of Historic Resources, California Historic Parkway, City of San Diego Historic Landmark, eligible for listing in National Register of Historic Places

The City of San Diego has a long established process of giving full consideration of comments on specific projects/processes by including the National Park Service, the State Historic Preservation Officer (SHPO), and Caltrans on projects within National Historic Landmark boundaries. A 2/11/11 letter from the California SHPO states, “We would strongly discourage any major construction projects that would have significant adverse impacts on the landmarks or remove any historic fabric from contribution elements such as the Cabrillo Bridge. We urge you to adopt criteria that would enhance the contributing elements and remain balanced with the original setting and character of the Landmarks.” The proposed project would impose irreversible damage on Balboa Park/Cabrillo Bridge historic resources, including eliminating a portion of the historic Cabrillo Bridge wall, permanently impairing the original 1915 view of the California Building by installation of a traversing modern bypass bridge, and scarring the park’s historic landscape by massive earth removal and retaining walls. A 5/20/11 letter from Caltrans states, “The city’s plan to add a bypass bridge...would in all likelihood result in significant impacts not only to the bridge itself, but to the state-owned Cabrillo Freeway Historic District.”

The proposed plan does not meet Secretary of the Interior Standards for Historic Preservation, and the EIR addresses the incorrect standard: (Ref: Executive Summary, Historic Preservation)

The Secretary for the Interior Standard state that “National Historic Landmarks, or many buildings individually listed on the National Register warrant Preservation or Restoration”, however the EIR discusses “Rehabilitation”, an inappropriate standard given the significance of the historic resource.

#### Mobility Element

*The general plan’s mobility element promotes a “balanced, multi-modal transportation network that minimizes environmental and neighborhood impacts...and encourages transit to link with often-visited destinations.”*

The proposed project will increase park/neighborhood mobility impacts by allowing a bypass bridge to carry cars from Cabrillo Bridge to a new interior parking structure, which will place

emphasis on the automobile versus multi-modal transportation. The amendments allow for a project design that replaces existing low-level vehicular/pedestrian conflicts with new, more severe conflicts in the Alcazar parking lot and at the intersection of the Cabrillo Bridge and Bypass Bridge. Proposed parking fees will encourage cars to park on perimeter streets, impacting neighborhood residential and business parking availability.

#### Urban Design Element

*According to the general plan, "Urban Design policies capitalize on San Diego's natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of our neighborhoods, strengthens the natural and built linkages..."*

The proposed project is detrimental to Balboa Park's distinctively historic character and to the natural setting by allowing major earth removal resulting in extensive retaining walls. Further the fencing/barriers required for public safety are not discussed in the EIR and have not been shown to the public as part of the public process.

#### Conservation Element

*The general plan's conservation element guides wise use of natural resources including topography, landscapes, views, and energy, and promotes reduced dependence on automobiles, which in turn lowers greenhouse gas emissions.*

The proposed project is not designed to reduce vehicular traffic or greenhouse gases. The project is expected to generate more traffic and GHG emissions, as well as negatively impact historic views and topography.

#### Land Use and Community Planning Element

The project lacks defined transportation system integration with surrounding community-planning areas.

#### Noise Element

Rerouted traffic along the southern side of Alcazar Garden, combined with the array of parking and drop-off activities (ADA parking, valet and taxi staging, freight delivery, shuttle and private passenger drop-off) is expected to negatively impact the garden and the House of Pacific Relations International Cottages' passive recreation and meditative settings.

#### **Balboa Park Master Plan (BPMP), Estrada Land Planning, Inc., Adopted 1989; Amended 1997, 1998, 2004**

*The BPMP serves as the park's "community plan." Its goal is to "to preserve, maintain, and enhance the 1915 and 1935 Exposition buildings, arcades, plazas, landscape horticultural elements, as well as the other building and site features which contribute to the local significance and the National Historic Landmark." The BPMP also includes a policy to enhance major off-site and internal viewpoints. Deviations from this plan require plan amendments that are "consistent with the goals and policies of the general plan."*

The proposed project allows for cutting into historic Cabrillo Bridge and imposing a modern bypass bridge on the California Building's (House of Charm's) historic view. The applicant argues that although architect Bertram Goodhue conceived the California Quadrangle and the Museum of Man with its dome and tower, and the California Building as an ancient European

town rising majestically above the canyon, this perspective has been hidden from San Diegans for decades by eucalyptus trees and therefore is not worth preserving. We disagree and feel that the “discovery” of such a hidden treasure should be revealed for all to enjoy rather than permanently destroyed. As one local writer put it, “What lover of beauty would tolerate a windbreak around the Taj Mahal?” In addition, the proposed intensified Alcazar Garden parking lot activities (two lanes of traffic, ADA parking, valet and taxi staging, freight delivery, shuttle and private passenger drop-off) are all fully visible from the garden, negatively impacting the garden views and tranquility.

*The BPMP emphasizes implementation of transportation and parking management techniques—such as relocating, at a minimum, employee and volunteer parking to the periphery, and prohibiting Naval Medical Center motorists from using dedicated park spaces—as an initial priority and states, “Accessibility to and within Balboa Park shall be increased through alternative modes of transportation including transit, inter-park shuttles, and intra-park tram, and bicycle facilities.” Among BPMP goals are:*

- *“to de-emphasize the automobile while increasing public access.”*
- *“to create within the park a more pedestrian-oriented environment, reduce automobile and pedestrian conflicts, and minimize through traffic.”*
- *“to improve public access to the park through an improved integrated circulation system, convenient drop-off points, better parking management, improved signage, and increased security”*

The proposed project is inconsistent with BPMP’s emphasis on alternative transportation solutions. The BPMP supports reclaiming plaza space for pedestrians. However, the proposed project would allow this to be accomplished at the expense of bringing even more vehicular traffic— attracted by an onsite parking garage—into the park’s interior via a massive new bypass bridge.

*In 2004, the BPMP was amended to allow an underground parking structure/transit center and pedestrian promenade on Park Boulevard in front of the zoo. The project would relocate internal parking to the park’s periphery, facilitate external public transit connections to the Park, and link pedestrian access from the Park’s northern end to the Prado. (The zoo parking structure/transit center/promenade project was put on hold pending completion of the city-sponsored “Balboa Park Land Use, Circulation and Parking Study.”)*

While the existing BPMP and CMPP allow for an Organ Pavilion parking structure, these plans envisioned this structure as only one component of a comprehensive strategy of peripheral parking, parking and traffic management, easily accessible park shuttles, walking and bicycling facilities, and links to public transit. These components are missing from the proposed project. Further, park planning trends discourage locating parking facilities within a park’s interior. BPMP amendments adopted in 2004, incorporating the Park Boulevard underground parking structure and transit center, reflected updated practices that relocate parking to a park’s periphery. Today, signature parks across the country have embraced this strategy, investing in integrated alternative transportation systems and reducing or even eliminating automobile use within the parks’ interiors.

*The BPMP provides for the Cabrillo Bridge to “carry only eastbound automobile traffic, freeing the westbound lane for the intra-park tram, inter-park shuttle, bicycles, and pedestrian use.” The*

*plan allows for the elimination of all automobile traffic from the 6<sup>th</sup> Avenue bridge entrance to the park at some future point per the following: "When offsite parking, transit, tram, and shuttle systems provide adequate access to the Prado and Palisades areas, consider closing Cabrillo Bridge to automobiles." It also calls for shuttle stops to be provided "in the center of the Prado to facilitate access to all institutions."*

A proposed project would eliminate any ability to manage bridge traffic as needed (e.g., to temporarily close one lane to auto traffic for use by pedestrians, bicycles, and shuttles, or to reverse auto travel direction to accommodate time-sensitive events such as theatre performances). Once a \$25 million bypass bridge is constructed to carry automobiles into the park's newly constructed \$40 million parking garage, there will be no further desire to close the Cabrillo Bridge and bypass bridge to automobiles, eliminating traffic management options and forever cementing a freeway through the middle of the park.

Overall, the applicant's proposed transit-related activities are unclear. The list of "Major Project Elements" includes "developing a new tram system that transports visitors between Pan American Road and the Plaza de Panama." However, this tram route is extremely limited in scope. The applicant provides a "Proposed Alternative Transportation System" map that depicts "light rail transit, park shuttle, and historic shuttle routes, and station and shuttle stops." However, there is no description of these systems or how they will operate independently or collectively. This raises a number of questions: How will a park-wide tram needs be met? Who will fund and manage the proposed new system? When will it come on line? Will the existing shuttle system running along the Prado and looping north on 6<sup>th</sup> Avenue continue its current route? How will the two shuttle systems interface with each other? How and when will they link with the other transit systems shown on the applicant's map?

The proposed project creates access issues for disabled individuals and for special event needs such as weddings. The amendments eliminate the Plaza de Panama drop-off location in front of the Museum of Modern Art, which currently provides centralized ADA access to west Prado facilities. Disabled visitors parking in the Alcazar lot will need to cross two lanes of bypass bridge traffic to access the Prado. There are questions about the ease of accessibility from the drop-off area to the Prado and mall. The proposed project eliminates shuttle stops will be provided in the center of the Prado to facilitate access to all institutions. So where *will* the shuttle stops be located and how convenient will they be for disabled visitors?

Finally, the proposed project allows for funding the new tram's operation and maintenance with parking fees from the parking structure. Given that the viability of financing the parking structure's construction and operation with parking revenue is questionable, the viability of adding tram expenses is highly unlikely.

**BALBOA PARK CENTRAL MESA PRECISE PLAN (CMPP), Estrada Land Planning, Inc., Adopted 1992; Amended 1998, 2002, 2004**

*The CMPP, prepared over a period of three years, refines several BPMP recommendations and is the basis for many Land Use, Circulation and Parking Study recommendations. The CMPP places emphasis on "creating a pedestrian-oriented park with convenient accessibility, preserving historical significance while meeting functional needs..." In 2004, the City Council amended the CMPP to allow for the Park Boulevard underground parking structure, transit center, and Promenade connecting to the Prado.*

### Circulation Element

*Current non-automobile modes of transportation serving the park are restricted to limited bus service on Park Boulevard and limited shuttle service from the Inspiration Point parking lot. The circulation element states: "Reducing the presence of the automobile will emphasize natural qualities of the park while recapturing the original intent of the Central Mesa design concept... With higher visitor levels in the future, alternate forms of transportation will become a necessity..." Objectives include:*

- *Reduce the amount of vehicular traffic through the Central Mesa*
- *Reduce pedestrian and automobile conflicts*
- *Utilize a park tram system to move visitors through the Central Mesa*
- *Incorporate off-site parking and shuttle service on peak use days*
- *Encourage the use of public transit as a primary means of access to the Park*

The proposed project will result in more automobile traffic entering the Central Mesa via the new bypass bridge to use the new Organ Pavilion parking garage. The plan calls for a circulation design that replaces existing pedestrian/automobile conflicts with more severe conflicts at the Alcazar Garden parking lot and at the intersection of the two bridges. The proposed shuttle system is limited to moving people from the southern end of the Plaza de Panama to the northern end of the Pan American Plaza. There are no defined linkages between this small-scale shuttle system, other shuttle systems, peripheral parking lots, or external transit, including between existing bus routes and the future Bus Rapid Transit (BRT).

The CMPP allows for the removal of all parking from the Plaza de Panama and for a one-way automobile route along its southwestern edge, making the plaza available to pedestrians and special events. The route would be designed with the ability to easily reverse traffic direction, and to close automobile traffic entirely during specified hours or events. This much less expensive and more environmentally sensitive approach to removing all parking and reducing automobile/pedestrian conflicts within the Plaza de Panama eliminates any need for a bypass bridge. It should be noted that although the BPMP recommends eliminating all automobile parking from the Plaza (which we support), it does not call for eliminating automobile traffic from the Plaza, instead "minimizing" such traffic. (The SOHO alternative "Precise Plan Light" plan would comply with this policy).

### Architectural and Landscape Element

*A key goal is "to rehabilitate and modify the physical environment of the Central Mesa in a manner which preserves its historic significance and provides for future uses."*

The proposed project will result in damage to a portion of the historic Cabrillo Bridge wall parapet and an impeded view of the historic California Building's southeast wall, both designed to create an ambiance of entering a fortified European hilltop town. The State Historic Preservation Officer, the National Trust for Historic Preservation, and Caltrans have each written letters expressing concern about the project's impacts on the park's historic designations. The amendments would also impact park landscape by allowing the removal of approximately 12,600 truckloads of earth and construction of excessive retaining walls in Palm Canyon and elsewhere. The impacts of the disruption to the park's institutions during construction are insufficiently addressed, as well as the fair use of citizens of the park's amenities.



## SUPPORTING CITY STUDIES

City-commissioned studies have been conducted since adoption of the BPMP and CMPP to assess Balboa Park circulation and parking issues in more depth. Study findings have reaffirmed BPMP and CMPP mobility strategies.

### **Balboa Park Land Use, Circulation and Parking Study Findings and Options, Jones & Jones/ Civitas, Inc., Completed 2004**

*City Council hired Civitas and partners to prepare a Balboa Park Land Use Circulation and Parking Study, which resulted in a findings and options report in 2004 and an action plan in 2006. Both involved extensive public input. (Note: The Planning Commission reviewed the recommendations but they were not processed as plan amendments due to lack of funding.) Civitas' findings reinforced BPMP and CMPP emphasis on "expanded public transportation access throughout the park, parking management implementation (an underlying priority), and relocation of existing parking facilities to the park's periphery along Park Boulevard." The 2004 report recommends 6 barometers by which all park improvements should be evaluated; 5 are discussed here.*

#### Reclaim, Restore and Conserve Parkland

*The study found that park space available without fees, membership, or other requirements had decreased to 600 acres. The study recommended preserving unencumbered space for all park visitors.*

The proposed project further restricts park use by imposing parking fees.

#### Protect and Enhance Historic Resources

The proposed project is in conflict with several local, state, and national historic designations.

#### Implement Parking Management and Appropriate Parking

*Park employees and volunteers use an estimated 1000 parking spaces in Central Mesa lots. Naval Medical Center visitors use Inspiration Point lots, an option many park visitors are largely unaware of. The study stresses the need to implement parking management strategies and relocate existing parking to the park's periphery.*

The proposed project does not address the need for parking management or periphery parking.

#### Implement Shuttle and Transit

*The study points out that the current loop trolley system lacks adequate capacity, and is not easily accessible by the disabled. It is perceived more as a visitor attraction than an efficient transportation solution. The study recommends instituting an efficient and user-friendly shuttle system within the park's center, linking park destinations to peripheral parking lots and to external transit, including existing bus routes and future Bus Rapid Transit (BRT).*

The proposed project does not adequately address the proposed small-scale tram system's links to internal/external transportation systems.

#### Distribute Costs and Benefits Fairly

*Public input emphasized that “the park belongs to everyone, and improvements should seek the highest and best use of the park’s precious resource.”*

The proposed parking structure relies on parking fees to pay off bonds with no guarantee that adequate revenue will be generated to cover bond debt. In fact, the city’s Independent Budget Analyst’s Report #11-44 (7/15/11) states that given the “abundance of free parking,” the 88 percent (now 75% but the same point applies) occupancy rate the projected that is required to adequately service the debt seems unlikely to be attainable, putting the city’s general fund at risk. Additionally, parking garage fees will result in motorists seeking spaces in the park’s’ free parking lots, restricting accessibility for their patrons and pressuring the institutions (see 12/15/10 letter from the San Diego Zoological Society to Mayor Sanders) to adopt parking fees themselves. The result will be greater hardship on lower-income park users. Also this will impact the Park’s institutions, who rely heavily on volunteers, many of whom are retirees and on fixed incomes.

**Parking Management Action Plan for Balboa Park Central Mesa & Inspiration Point, Tilghman Group/ Civitas Inc., Completed 2006**

*The 2006 Civitas Action Plan recommends specific parking management approaches for the Central Mesa and Inspiration Point, and more effective use of shuttle vehicles. Existing ridership limitations were identified, including use of open-air buses designed for tour groups, not for shuttle riders; high floors, multiple steps, single doors, and separate wheelchair lifts; and a no-standing policy. The plan recommends modifying the shuttle-system routes and reallocating hours of service based on demand.*

The proposed project does not address the proposed shuttle’s operational aspects, including its relationship to the existing shuttle system or linkages with other transportation modalities.

**The Future of Balboa Park, Balboa Park Committee, Adopted 2008**

*This study assessed the park’s financial structure and states: “Due to limited staff resources, parking and traffic cannot be adequately managed” and “although the Land Use, Circulation and Parking Study recommends hiring a transportation officer to identify and implement programs that will mitigate problems in these areas, this position has never been funded.”*

The proposed project does not adequately address traffic or parking management policies.

**SANDAG 2050 Regional Transportation Plan (RTP), Adopted Oct. 28, 2011 and Metropolitan Transportation Systems (MTS) Feasibility Study, Ongoing**

*SANDAG’s 2050 RTP is the region’s long-range mobility plan for multi-modal transportation. Along with the City’s general plan mobility element, the RTP stresses the importance of integrating transportation and land-use decisions and “using multi-modal strategies to reduce congestion and increase travel choices.” The RTP plans an I-805 north-south trolley corridor from University City to Chula Vista, supported by three new east-west trolley lines. One of these trolley lines will link downtown San Diego, Balboa Park, surrounding communities, and SDSU. In March 2011, MTS began studying the feasibility of establishing a fixed guideway Balboa Park streetcar line to reconnect downtown San Diego (from the City College transit station) with Balboa Park—reviving a similar Park Boulevard route operating from the late 1800s to 1949. MTS is considering using vintage streetcars from the new Downtown Silver Line, which will soon include two original Class 1 cars that operated during the 1915 Panama-Cal Expo.*

The proposed project submittal documentation is unclear regarding integration of the proposed new shuttle system with other systems, including bus routes, the future BRT, and the planned trolley line linking downtown and Balboa Park. It is our understanding that the two vintage streetcars that transported attendees of the 1915 Expo could potentially be restored and ready for the 2015 centennial celebration.

**Proposed Organ Pavilion Parking Structure Math:**

**Currently Existing, already-Paid-for Parking Spaces:**

Organ Pavilion Lot	367	
Alcazar Gardens	136	(retain 32 spaces)
Plaza de Panama	54	
<b>Total existing spaces - 0 cost</b>	<b>557</b>	

Total # of spaces in New Parking Structure	798	
Less # of existing parking spaces	525	(557 - 32 retained in Alcazar gardens)
<b>Total # of <u>New</u> parking spaces created</b>	<b>273</b>	Note: 100 of these will be reserved for Valet Parking

**Actual Cost per New Parking Space:**

Estimated Parking Structure cost:	\$15,000,000.00
Divided by # New Parking Spaces created:	273
<b>Real cost per New Parking Space</b>	<b>\$54,945.05</b>

**Add in a conservative 50% Debt Service Coverage Requirement for the Bond Issue**

Jacobs Team Estimated Parking Structure cost:	\$15,000,000.00
Plus 50% DSC per Old Town Parking Study	\$7,500,000.00
<b>Estimated Structure cost including Debt Service</b>	<b>\$22,500,000.00</b>
Divided by # of new parking spaces created	273
<b>Cost per New parking spot including Debt Service:</b>	<b>\$82,417.58</b>

**Debt Service Cost as estimated by the Independent Budget Analyst (IBA):**

Parking Structure cost as estimated by Jacobs Team		\$	15,000,000.00
Annual Debt service on \$14M Bonds per IBA	\$ 1,200,000.00	x 30 years	\$ 36,000,000.00
<b>Estimated Structure cost including Debt Service</b>		<b>\$</b>	<b>51,000,000.00</b>
Divided by # of <u>new</u> parking spaces created			273
<b>Cost per New parking space including Debt Service:</b>			<b>\$186,813.19</b>

**Annual Costs to come out of any Parking revenues before Debt service (per IBA report):**

Estimated Maintenance for roof park per IBA	\$	45,000.00
Annual Security Service Costs recommended by IBA	\$	175,000.00
*Annual Operating costs @ \$450/space x 785 spaces	\$	353,250.00
Maintenance for Parking Section		( Unknown)

Estimated additional annual operation costs:

\$ 573,250.00

Link to the City of San Diego Independent Budget Analyst's (IBA) Report on the Plaza de Panama Project:  
[http://www.sandiego.gov/iba/pdf/11\\_44.pdf](http://www.sandiego.gov/iba/pdf/11_44.pdf)

**Concerns Regarding the Paid Parking Structure Proposed in the Plaza de Panama Plan:**

Link to the City of San Diego Independent Budget Analyst's Report (IBA) report on the Plaza de Panama Project:  
[http://www.sandiego.gov/iba/pdf/11\\_44.pdf](http://www.sandiego.gov/iba/pdf/11_44.pdf)

Per the Independent Budget Analyst's (IBA) report, the Plaza de Panama Committee projects an **occupancy level of 88%** for the garage, and project that the parking revenue will not only pay off the \$14M in bonds, the debt service on those bonds, the maintenance and operating costs for the structure, but also pay for operation of a "people-mover" shuttle from the garage to the Plaza de Panama. The **IBA report expresses doubt that these revenue/occupancy projections can be met.**

Per the IBA Report: "Current Plaza de Panama, Alcazar Garden, Organ Pavilion, and Palisades Lot usage data was analyzed by the Committee's parking consultant in projecting revenue to be generated for the new proposed parking structure. The analysis assumes the visitors/employees/valet patrons served by these lots would be users of the new paid parking structure. The analysis also assumes that the proximity of the structure to the core of the park will create additional demand for parking."

The IBA Report goes on to say:

**"The availability of free parking in other areas of the park poses a challenge for occupancy assumptions for the paid parking garage on typical non-event days at the park.** As noted above, there are currently approximately 6,500 available free parking spaces in the Central Mesa and Inspiration Point areas of the Park. Free parking exists at 15 lots including the Zoo, Inspiration Point and the Federal/Aerospace Lot. Free parking also exists along Park Boulevard and in surrounding neighborhoods. In reviewing parking supply and demand statistics provided by the Committee's parking consultant, the IBA acknowledges that during non-event peak visitor times at the park, such as free Tuesdays at the park, parking close to park exhibits and destinations can experience high levels of occupancy. Even so, during those times of peak visitation at the park, parking is still available at Inspiration Point and Federal/Aerospace Lots further away, which are underutilized at approximately 50% capacity. The Inspiration Point and Federal/Aerospace Lots offer 1,264, and 509 spaces, respectively."

**Concerns: A lot of expense and impacts to environmental and historic resources for very little gain**

- The proposed project removes 557 existing, FREE and already-paid-for parking spaces, as well as existing and already-paid-for infrastructure like restrooms and established park landscaping. All this for a net gain of 273 new Pay-to-park spaces, 100 of which will be reserved for Valet parking. While the structure will have a total of 798 spaces, all will be pay-to-park, in contrast to the 557 existing Free-to-park spaces.
- The Paid Parking Structure is very unlikely to meet the required occupancy level to generate sufficient income to service the debt on \$14M unless every single parking space in and around Balboa Park is pay-parking. (See originally-projected vs. actual occupancy numbers for the North Park Parking Structure as a benchmark for expectations)
- 12/15/2010 the San Diego Zoo wrote a letter expressing their concern that paid parking in the park core would put unwarranted pressure on their Zoo parking lot, and force them into making that lot "pay-to-park" also. The Zoo's current lease permits them to charge for parking in their parking lot. Should they choose to do this as a consequence of the proposed paid parking structure, this would further reduce free parking in the vicinity of the park and place additional pressure on other park parking lots.
- The revenue from the paid parking in the structure is supposed to pay for the internal "people mover" tram. How will this be paid for if the revenue projections are not met? Will a revenue shortfall result in less frequent tram operation?
- The parking structure roof-top deck garden with buildings, restrooms, etc. is not included in the Plaza de Panama Committee's cost estimate of \$15M (nor in the total project \$40M budget) but instead relies on additional donation funding from the Plaza de Panama foundation. If donations are not forthcoming, will we be left looking at a plain roof with no improvements? What is the guarantee that the restrooms to be located on the roof will be built? Especially since the main park restrooms across from the Organ Pavilion, as well as those in the Alcazar Garden parking lot will be demolished for this project.

- Many of the Park institutions depend on unpaid volunteers for their ongoing operations and support. What impact will paid parking throughout the park have on these volunteers, and will they be willing to pay-to-park or will the institutions be willing to subsidize their paid parking?
- Paid parking in the park puts an unreasonable burden on families and economically disadvantaged residents wishing to use the park, and disproportionately emphasizes valet parking

### North Park Parking Structure, Projections vs. Reality:

# of Parking Spaces:	388
Parking Rates/fees:	\$ .50/half hour to park with a flat rate of \$5 after 5 pm
Projected Revenue:	Per the 2003 Walker Parking Study Net operating revenue predicted to increase from \$380,000 to \$710,000 over 7 years
Actual Annual Revenue:	+ - \$150,000/year (has averaged same or less since it opened) < 1/2 the lowest projected revenue
Projected Expenses:	\$ 218,000/year (not including bond payments or debt service)
Actual Annual Expenses:	\$195,000/year (maintenance, operation, etc., does <u>not</u> include debt service on bonds)
Current Occupancy rate:	+ - 25%

\$150K revenue less \$195K in expenses leaves a \$45k shortfall every year

### Transient Turns:

= Number of tickets / number of spaces / number of days in the period (30 or 31 days)  
Average transient turn number of .25 = 25% occupancy rate

Level of Demand at North Park Parking Garage				
June 2009 - June 2010				
Period Begins	Period Ends	Tickets Issued	Spaces	Transient Turns
6/1/2009	6/30/2009	1,868	388	0.16
7/1/2009	7/31/2009	1,765	388	0.15
8/1/2009	8/31/2009	2,098	388	0.17
9/1/2009	9/30/2009	2,206	388	0.19
10/1/2009	10/31/2009	3,434	388	0.29
11/1/2009	11/30/2009	2,891	388	0.25
12/1/2009	12/31/2009	2,848	388	0.24
1/1/2010	1/31/2010	3,347	388	0.28
2/1/2010	2/28/2010	3,591	388	0.33
3/1/2010	3/31/2010	3,669	388	0.31
4/1/2010	4/30/2010	3,457	388	0.30
5/1/2010	5/31/2010	4,044	388	0.34
6/1/2010	6/30/2010	2,393	388	0.21
Totals		37,611		
Averages		2,893	388	0.25

Table 13: Net Operating Revenues, 2005-2014					
	2005	2006	2007	2008	2009
Operating Revenue <sup>(1)</sup>	\$780,883	\$833,840	\$900,503	\$986,563	\$1,065,166
Operating Expenses <sup>(2)</sup>	(\$232,125)	(\$239,089)	(\$246,261)	(\$253,649)	(\$261,259)
Lease Payment <sup>(3)</sup>	(\$168,000)	(\$168,000)	(\$168,000)	(\$168,000)	(\$168,000)
Net Operating Revenue	\$380,758	\$426,751	\$486,241	\$564,914	\$635,908
	2010	2011	2012	2013	2014
Operating Revenue	\$1,097,121	\$1,130,035	\$1,163,936	\$1,198,854	\$1,234,820
Operating Expenses	(\$269,096)	(\$277,169)	(\$285,484)	(\$294,049)	(\$302,870)
Lease Payment <sup>(3)</sup>	(\$168,000)	(\$168,000)	(\$168,000)	(\$168,000)	(\$168,000)
Annual Net Revenue	\$660,025	\$684,866	\$710,452	\$736,805	\$763,949

**Notes:**  
Garage is assumed to open at the beginning of 2005, along with the theatre and retail/office development.  
(1) Operating Revenue increases according to attendance receipts for 3 years (provided by lyric) and inflation of existing bond rates over first five years (per City). We increase rates of 3% annually to keep pace with inflation; the City may opt to increase rates at a different rate.  
(2) Expenses assumed to increase by 3% per year.  
(3) Lease Payment estimates provided by City.



A judge's determination that the City of San Diego entered into an illegal Memorandum of Understanding with the Plaza de Panama Committee severely compromises the EIR process on this project. The accelerated nature of the public process and the ignoring of public input does the same. The alternatives explored in this EIR are not as suggested during the public process, and several suggestions have been ignored.

**Proposed Master Plan and Precise Plan amendments for this project are inconsistent with several elements of the General Plan, and are inadequately address in this EIR:**

- The proposed project does not reduce traffic (MOBILITY ELEMENT/NOISE ELEMENT)
- The proposed project does not reduce vehicle-pedestrian conflicts (CIRCULATION ELEMENT)
- Policies in the proposed plan amendments for this project would need to be revised to be up to date with Greenhouse Gases and Stormwater Regulations and are therefore inadequately addressed in this EIR (CONSERVATION ELEMENT)
- Current plan to maintain the organ pavilion parking structure contradicts Jones & Jones (2006?) report which included an appropriate public process, and is closer to current planning thinking. The reason it was not implemented it was because they run out of funds (PUBLIC FACILITIES, SERVICES & SAFETY ELEMENT)
- Trams proposed are insufficient (MOBILITY ELEMENT)
- Proposed people movers do not connect to mass transit (MOBILITY ELEMENT)
- Need better bond studies to see if incoming revenue will pay the debt service (PUBLIC FACILITEIS, SERVICES & SAFETY ELEMENT)
- Proposed project would not reduce greenhouse gases (CONSERVATION ELEMENT)
- The original intention of the project is to remove the cars from the Plaza de Panama. The proposed plan adds more cars overall (MOBILITY ELEMENT, PARK AND RECREATION ELEMENT)
- Lack of integration of Community Plan Updates (North Park, Uptown, Greater Golden Hill) into the proposed amendments (LAND USE AND COMMUNITY PLANNING ELEMENT)
- Increasing parking, more cars parked and less transit (MOBILITY ELEMENT)
- Makes inappropriate changes to historically designated landmarks (HISTORIC PRESERVATION ELEMENT)
- Organ Pavilion Parking Structure design is no longer open to a local competition (ECONOMIC PROSPERITY ELEMENT/URBAN DESIGN ELMEMENT)
- Implementation of paid parking (RECREATION ELEMENT/ECONOMIC PROSPERITY ELEMENT)
- The *Balboa Park Master Plan* preparation and ultimate adoption took 9 years of preparation, including a 3 year public input process. The *Balboa Park Central Mesa*

*Precise Plan* also took several years of preparation and public input process prior to the final adoption.

- The Cabrillo Bridge was closed twice in the past, and in both cases attendance in the park went up; the bridge was closed once to repave it, and the second time during a 3-month period for retrofitting. The Plaza de Panama's refusal to request attendance, traffic, circulation & parking studies when the Cabrillo Bridge is closed to vehicular traffic during special events or during the Cabrillo bridge's closure for seismic retrofitting during 2012 means that impacts to surrounding communities are inadequately studied.
- The Bypass bridge alternative was studied and rejected during the public process for the original *Balboa Park Master Plan*. The issues that existed 20 years ago when the original plan was being put together are still applicable today.
- The currently proposed Parking structure behind the organ pavilion is part of the *Balboa Park Central Mesa Precise Plan*, however its design was supposed to be awarded through a national competition. Eliminating this competition and replacing it with a unilateral decision by San Diego's Mayor and Irwin Jacobs calls into question the adequacy of the public process, and this EIR.
- An earlier "*Balboa Park Land Use, Circulation, and Parking Study*" prepared by Civitas recommends the parking structure be located along Florida Canyon, but was not adopted at the time due to funding issues. The *Balboa Park Central Mesa Precise Plan* should have been updated a long time ago to show all parking structures removed from the central core of the park and placed along the periphery instead.
- The proposed parking structure adds only 273 *New* spaces with 100 of those being reserved for valet parking. Too much money for too little benefit.
- It is possible that the Palisades parking lot will also close in the future, making the need for parking on the periphery of the park greater. These impacts are inadequately addressed.
- It is clear that the revenue from the proposed parking structure would be insufficient to pay off the bond debt, operations and maintenance of the structure, and would not leave sufficient revenue available to operate the "people mover" tram as proposed. According to the IBA report "*The proforma assumes an average 88% annual occupancy for the proposed parking garage*". The IBA report then goes on to state that "*The availability of free parking in other areas of the park poses a challenge for occupancy assumptions for the paid parking garage on typical non-event days at the park. As noted above, there are currently approximately 6,500 available free parking spaces in the Central Mesa and Inspiration Point areas of the Park. Free parking exists at 15 lots including the Zoo, Inspiration Point and the Federal/Aerospace Lot. Free parking also exists along Park Boulevard and in surrounding neighborhoods. it is not likely to get to those levels because unless for special events, most of the time the parking structure would be empty.*" This places the burden of financing the parking structure on the taxpayers and these economic impacts have been inadequately disclosed
- The concern is that, once it becomes apparent that the revenue from the parking structure is insufficient due to lack of occupancy and available free parking elsewhere, the city will make all parking "pay to park" inside the park, negatively impacting the ability of the city's average and poor citizens to enjoy the park's amenities. Conflicts with General Plan's Economic Prosperity Element
- If paid parking is instituted, people will look elsewhere; the Zoo will soon start charging and everyone will be impacted. Conflicts with General Plan's Economic Prosperity Element

- Concurrently occurring plan amendments for this project are a cause for concern. While the EIR has to meet CEQA, overriding findings for the EIR can always be made by the City if it has already “shoe-horned” the project into the plan amendments.
- Regarding the reducing traffic through the center of the park; An inexpensive alternative is to use removable bollards as currently used in other US cities and in Europe and in other parts of the world, in order to diffuse vehicular traffic.
- Parking in the Plaza de Panama is easily removable today without building a Bypass bridge

### *Balboa Park Master Plan*

The Balboa Park Master Plan was adopted in 1989 after 8 years of community input; the text in the currently proposed amendment is about to make drastic changes to the original plan and has not had positive public input to date.

- The adopted Balboa Park Master Plan (Figure 13) does not include a bypass at the Cabrillo Bridge but rather shows a reversible one-way route through the Plaza the Panama; which makes the Cabrillo Bridge more pedestrian and transit friendly.
- The adopted plan shows the Cabrillo Bridge carrying only eastbound traffic, freeing the westbound lane for the intra-park tram, inter-park shuttle, bicycles, and pedestrian use; the proposed amendment shows two-lane vehicular traffic through the Cabrillo Bridge.
- The adopted plan calls for the parking facility at the Palisades to be subject of an architectural design competition to ensure the widest possible search for a quality design; the amendment gives the applicant (“the Plaza de Panama Committee”) the freedom to choose the architect for the parking structure, eliminating the option for the best possible design to be integrated into the area in question.
- The adopted plan calls for automobile access from the parking structure at the Palisades to the Prado to pass under the promenade; the proposed plan eliminates this option.
- Alternative D in the 1986 and 1987 EIR is the environmentally preferred Alternative as shown in Figures 28 and 34. This closes the Cabrillo Bridge to vehicular traffic and it uses Quince Street as its main vehicular access from the west. Not adequately studied or addressed in this EIR

### *Balboa Park Central Mesa Precise Plan:*

- The Balboa Park Central Mesa Precise Plan was adopted in 1992 after 3 years of community input; the text in the proposed amendment is about to make drastic changes to the original plan and has not had positive public input to date.
- The Balboa Park Central Mesa Precise Plan does not include a bypass at the Cabrillo Bridge, but rather details a reversible one-way route through the Plaza de Panama which removes most of the vehicular traffic from the Plaza de Panama without construction of the bypass, making the Cabrillo Bridge more pedestrian and transit friendly.
- The 2-way bypass road in the proposed amendment does not separate vehicles and parking from pedestrian corridors, since pedestrians will tend to use the same road, and the narrow cross section with two 13’ vehicular travel lanes will create traffic jams when a vehicle gets a flat tire or ceases to operate because no shoulders are provided.
- The proposed project reconfigures the Alcazar Garden Parking Lot, creating a LOT of conflicts between pedestrians and vehicles, because it provides handicapped parking/accessible parking, valet drop-off, and bus drop-off all at the same location as the main vehicular entrance to the park, directly conflicting with vehicular traffic that is passing by in order to get to the parking structure.



- Alternative D in the 1986 and 1987 EIR is the environmentally preferred Alternative as shown in Figures 28 and 34. This closes the Cabrillo Bridge to vehicular traffic and it uses Quince Street as its main vehicular access from the west. Not adequately studied or addressed in this EIR

*Grading Plan and Landscape Plan; specific concerns:*

- The amount of dirt that will be exported from the site should be reduced. The project proposes 159,000 cubic yards of cut; 33,000 cubic yards of fill, and 126,000 cubic yards of export. At approximately 10 cubic yards per truck, approximately 12,600 truckloads of earth are proposed to be moved elsewhere.
- The proposed project should eliminate or reduce the height of the retaining walls shown for the unsafely curving road, which is currently 15 feet to 20 feet tall in the vicinity of the organ pavilion, including eliminating or reducing the very deep excavation for construction of the road, and eliminating or reducing the slopes and drops involved that would otherwise create a hazard.
- The plans & renderings for the proposed project should clearly show safety railings where required for the steep slopes to be created. They do not. Inadequate public information
- The proposed project should analyze the loading zone in the Alcazar Garden Parking Lot for eastbound traffic, which currently is not long enough for 2 buses.
- The proposed project should better analyze the conflicts with pedestrian and vehicular interference, due to the fact that pedestrians must cross the flow-through traffic to get from ADA (American Disabilities Act) cars to the access ramps.
- The proposed project should better analyze ADA accessibility conflicts with flow-through traffic.
- The proposed project should analyze the roadway exiting the Alcazar Gardens leading into the new parking structure where the curve in the road has a radius of 102', which is a steep turning radius and would not be permitted on a public street.
- The proposed project should better analyze the curve in the roadway on the northeast side of the new parking structure, which has a radius of 83' and is a sharp radius that would not be permitted on a public street.
- The proposed project should better analyze the 90-degree turn from the Cabrillo Bridge onto the Bypass, which is not an improvement over the current route through the park and under City guidelines would require a stop sign.
- The proposed project should better analyze the 90-degree turn from the Cabrillo Bridge onto the Bypass that creates pedestrian-vehicle conflicts
- The proposed project should better analyze pedestrian traffic for the Bypass, because there is sidewalk proposed on both sides of the Bypass and pedestrians will tend to use the same road as vehicles.
- The proposed project should better analyze likely traffic jams into the park because the cross section shows two 13' vehicular travel lanes and traffic jams can be created when a vehicle gets a flat tire or ceases to operate because no shoulders are provided.
- The proposed project should better analyze the impacts of concentrating all vehicle pedestrian conflicts within the Alcazar Garden parking lot, instead of the existing very diffused (and therefore less impactful) conflicts along the existing route. With all pedestrian pick-ups and drop-offs located in the Alcazar lot, all these interactions are concentrated and likely to impede smooth traffic flow and result in accidents to pedestrians. In the current circulation, pedestrians can be picked up and dropped off in myriad places along the route, diffusing and lessening these impacts.

The following categories were tabulated with specific areas of concern:

- Vehicular Traffic: Goal should not be bringing traffic into the core of the park, but rather minimizing or eliminating it.
- Bypass Bridge: The Bypass Bridge does not comply with accepted guidelines for treatment of historical resources.
- Fees: The Introduction of Fees brings land use issues, has impacts in areas outside the park as well as inside the park
- Net gain of parking spaces: If more parking is needed, the net gain from this proposal does not increase it by much
- Funding: There is no guarantee that there is adequate funding; there is no guarantee that parking structure occupancy will support the level of funding needed to service bonds; there is no guarantee that funds can be raised by the Plaza de Panama Committee as promised;
- Private influence in public property: The inordinate influence of moneyed interests on public parklands with this proposal raises the issue of conflict of interest
- Legal challenge: The recent MOU entered into by the City with the Plaza de Panama committee is currently under legal challenge. There will likely be further legal challenges to this project due to its impact on significant historic resources, resulting in growing legal expenditures for the City.
- Previous planning efforts: This proposal disregards all the past years of planning efforts and public input.
- Public Transit: The proposal does not bring transit into the park and would not alleviate increase of vehicular traffic. Lack of compliance with the SANDAG 2050 Regional Transportation Plan