

## Balboa Park Comfort Stations: An Analysis with implications for San Diego City Policy Changes

René A. Smith, February 19, 2019



Men's Public Toilet adjacent to San Diego Air & Space Museum. As taken by a visitor from Ohio who said "I've just returned from a lengthy trip to rural China. Nowhere have I seen such a disgusting public toilet." Q.v. Recent comparisons to Mumbai in the San Diego Union-Tribune.

Alternatively, another world class city Sydney, Australia has a stated policy on public toilets: "The City of Sydney is committed to creating a liveable and sustainable city that provides a high quality of life for its residents, visitors and businesses. The provision of public toilets contributes to the quality of the City's public domain and its liveability." The City's vision is for a: "highly regarded, safe and accessible network of public toilets to meet the current and future needs of a world-class city." There are 117 public toilets across the council area of which 54 are owned and managed by the City."

San Diego City has no such public toilet policy.

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## Executive Summary

During the 1960s, Balboa Park witnessed the creation of many of the 23 existing, detached Comfort Stations [CS] present in the park. Fifty plus years on, the facilities are an embarrassment and blemish upon Balboa Park's status as a World Class entity. They are a partial refutation, in fact, of any such conception. They assault the user from many vantage points: health, safety, ADA compliance, cost of operations but most importantly from a human dignity and social justice perspective.

This report is provided to spur action to address these unacceptable conditions. We only need to remember those who died during the most recent Hepatitis A outbreak to wonder whether conditions similar to those shown in the pictures in this report aren't conducive to another such catastrophic event. And, one only needs to look at some of the photographs to wonder where someone with a wheelchair would go to use some of these public toilets.

Building upon an earlier infrastructure analysis,<sup>1</sup> this analysis of Balboa Park's comfort stations evaluates economies of scale leading to a planned program of replacement. For example, several of the CS would be replaced, in situ, with economic benefits supporting prefabricated units. The quantitative case for replacement exists, but it is overshadowed by the demonstrably more important qualitative demand for action. It calls for a systematic program for rehabilitation and replacement.

The City embarked upon a program of standardization of Comfort Stations before 9/11/2001.<sup>2</sup> After 18 years of periodic attention and discussion, we are nearing a solution on standardized Comfort Stations. Nonetheless, we are still far from consensus on a Public Toilet Strategy. Other world-class destination cities such as Sydney, Australia<sup>3</sup> recognize the importance of such a strategy. Given the recent Hepatitis A outbreak, the continuing prevalence of homelessness, and public concern for health and sanitation now is the time to address these matters.

Now is the time to decide how many public toilets are necessary for Balboa Park, what their configuration should be, where they will be located, and how to fund their replacement, operation, and maintenance. If we can do this, it will be a successful example of good government and policy. We can then use our experience to aid us in developing a long term strategy for a city-wide public toilet renovation, replacement, and maintenance program.

This paper provides the rationale for a comprehensive approach to solve a severe public health issue utilizing a determined, consistent application of standard designs, cost beneficial construction procurement, and to result in enhanced human dignity and social justice.

Our system of government progresses when political leadership acts for the public good. San Diego fits that model; progress flows from political leadership. It is time for our political leaders to solve this problem. Toilets momentarily arose to the attention of that leadership during the Hepatitis A outbreak recently. The deplorable CS conditions in Balboa Park might contribute to another outbreak. As the memory of that event fades, so may political leadership's interest in public toilets. While the memory is still relatively fresh, this analysis provides a call to action and a suggested set of steps to accomplish that action.

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<sup>1</sup> Facilities Condition Assessments [FCAs] -Balboa Park Analysis, René A. Smith, July 18, 2018.

<sup>2</sup> City of San Diego, Manager's Report, 02-069, Standardized Design and Community Review for Comfort Stations, March 27, 2002 [Note Comment re: CM Scott Peters June 2001 request] and City of San Diego, Manager's Report, 03-025, Standardized Design and Community Review for Comfort Stations, February 14, 2003

<sup>3</sup> [https://www.cityofsydney.nsw.gov.au/\\_data/assets/pdf\\_file/0007/199816/2013-460160-02-Policy-Attachment-C-Public-Toilet-Strategy-Adopted.pdf](https://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0007/199816/2013-460160-02-Policy-Attachment-C-Public-Toilet-Strategy-Adopted.pdf). See also Brisbane, Australia and Portland, OR.

## Statement of Purpose

The aged Comfort Stations [CS] in Balboa Park are an assault upon human dignity, social justice, and the well-being of its users. They also create a burden for the limited staff and resources of the parks & recreation department.

**Before disaster strikes again, now is the time to decide how many public toilets are necessary for Balboa Park, what their configurations should be, where they should be located and how to plan for their replacement, rehabilitation and operations, and maintenance funding. Such an analysis should then lead to the development of a public toilet strategy.**

This paper alone cannot answer these questions. It can only raise them in concert with a recommended program to seek and obtain the quantifiable answers.

This paper makes specific recommendations of the actions necessary to improve these Comfort Stations in Balboa Park and also provides the construct for a citywide approach to public toilets. Such an approach, if implemented, would place San Diego on a level with other cities globally who have recognized and addressed this issue: cities that rightly consider themselves “World Class.”

## Current Conditions

In Balboa Park, a central city park of 1,100+ acres in San Diego, California, there are 23 sixty-year-old, worn and otherwise undesirable stand-alone concrete block, slab floor public toilet buildings. They are a model used extensively throughout the City’s Park system. They fail any reasonable test of effectiveness, efficiency, ADA compliance or just basic human dignity.

Some, because of their out of the way locations (notorious both for sex and drug trafficking) have been closed for years. Others have had their stall doors removed to prevent such activities.

They are just not places that anyone would choose to use. Several of them have open toilet stalls, separated by a minimalist partition. In some cases, you can look into the restrooms and see the booths from the outside sidewalk. In many other cases, there is not any remote likelihood of an individual with a severe physical disability using them. In some cases, the CSs are remote, poorly lighted, and pose a safety hazard. Finally, many of the CS locations have at times become homeless encampments. The appalling pictures on the cover, in the attachment and the KUSI video, make these points clear. [see: below attachment.] Given the photographs in this report, there is little reason to elaborate on the condition of these structures.

Two imperatives: the recent Hepatitis A outbreak raised public awareness regarding issues of public sanitation and the real human and financial costs of a lack of adequate public facilities. Within about the same period, the City of San Diego was sued regarding the need for ADA accessible public toilet facilities in Balboa Park. Might these be two avoidable “ticking time bombs?”

While we are a long way from open trenches, we are also a long way from what is considered “state of the art” and acceptable. These facilities are a couple of generations old. Every couple of generations, an assessment of public facilities in support of sanitation and public health is certainly warranted. Sewer and water standards, ADA imperatives, and shifting public expectations all have changed. This analysis begins that assessment.

## Matters to Understand

### Standards

This analysis attempted to identify a planned program of replacement using recognized standards to determine the appropriate number of public toilets needed. If one is to undertake an expensive effort to replace these units, some criteria or indicators of service use would be valuable in creating the most effective plan. I was informed by the New York Central Park Conservancy regarding standards: “There are too many different variables: the nature of the place, how it is used, by how many people, for how long, etc.”<sup>4</sup>

The best I have found are recommendations that public park toilet facilities be no more than 400 to 500 meters apart. But those recommendations are inadequate in that they there is no indication as to size or how best to determine size.<sup>5</sup> The issue is compounded because the overwhelming majority of visitors come to the building intense area of the park where there are large numbers of standalone and building interior toilets. There are vast areas of the park where most of the CSs exist but with significantly fewer visitors and, thus, users.

The question remains: how can one best determine the optimum number of public toilets for dispersed and generally little-used areas? Several cities have grappled with this issue, and their efforts are included in the reference section. This report cannot address the issue of size and location of CS; it can only raise the matter for further study and action. It is likely that not all of the 23 Comfort Stations will either need replacement or be necessary. (You may not agree here.)

### Public Toilets versus Public Access Toilets

The standalone CS discussed in this report are public toilets. Open to all for as long during the day as public health requirements and City operations budgets allow. [Fact: approximately \$1,000,000 in toilet paper is consumed in the public toilets of Balboa Park annually.] Public Access Toilets are a different matter. Often under the best of conditions, they are usually located behind a host of discouraging barriers. For example, in a public building, open to all in Balboa Park, we find this sign, discouraging use:

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<sup>4</sup> From the Central Park Conservancy, January 19, 2019: “We have a limited number of restroom facilities in the Park, and they are generally located within historic buildings. They don’t reflect any standard details ... As for appropriate number and distribution of toilets, you may find standards for certain types of recreational facilities or based on occupancy, but not for parks and public spaces.”

<sup>5</sup> No Place To Go How Public Toilets Fail Our Private Needs, p. 49 “... in Canada, the US, and the UK there are no statutory requirements to provide toilets to the public.” It develops that, unlike office buildings and stadiums, there are no recognized local, state, national or international standards for the number and size of public toilet facilities in parks. Approximately a dozen institutions, organizations, corporations, legislative bodies in addition to a detailed internet search revealed this to be the case.



Here's a comparison between what awaits one using the above Public Access Restroom or the one indicated by the Air & Space Museum:



In the 1950s, it was customary to charge a dime to use a public toilet. We've changed that. Now we use food and beverage charges to restrict public access. This paper cannot address the appropriateness of such an approach in public buildings. It can only point out the current practice.

### Prefabricated Comfort Stations – A History in San Diego

In 2001, then City Council Member Scott Peters asked why the City cannot use prefabricated and predesigned buildings for multiple similar structures in the City's inventory. Eventually, the Public Works Department created designs for Fire Stations, Shade structures and Comfort Stations. The plans for the CS structures and facades are in the final review stage, before acceptance as City standards. As part of this effort, it is hoped that the City of San Diego Consultants Guide to Park Design & Development will be updated.<sup>6</sup> Hopefully, both of these efforts will lead to the development of a Public Toilet Design publication such as the one developed for Brisbane, Australia.<sup>7</sup>

<sup>6</sup> <https://www.sandiego.gov/sites/default/files/legacy/park-and-recreation/pdf/parkdesign/consultantsguide2011.pdf>

<sup>7</sup> [https://www.brisbane.qld.gov.au/sites/default/files/public\\_toilet\\_design\\_guidelines\\_updated.pdf](https://www.brisbane.qld.gov.au/sites/default/files/public_toilet_design_guidelines_updated.pdf)

## Analytical Approach

In July 2018, a detailed analysis of the Balboa Park infrastructure by this author<sup>8</sup> identified a current backlog of \$400 million that is growing to over \$1 billion unless the trend of investment is reversed. That analysis used the City's Facility Condition Assessment [FCA] data and its likelihood of failure information. This CS analysis builds upon that work by taking a subset of the 117 Balboa Park structures, namely the 23 CS, and analyzes them from the perspective of the possible economies of scale that might result from the cost-effective replacement of most of the CS structures. It also examines the qualitative aspects of a replacement and refurbishment program, and a plan for further analysis.

### FCA Approach – Discussion, Limitations, and Scope

The referenced Facilities Condition Assessments Analysis presented in detail the various aspects of the analytical approach used to determine capital reinvestment requirements for all Balboa Park structures based on the 2016 City-wide FCAs. That analysis detailed how the City of San Diego undertook the study and what that data provided in the way of limitations and scope. There is no need to replicate that information here. [Copies of the report are available by email from the author.]

What does need to be restated is that the City Council approved a Service Level Standard of 15 for all Public-facing structures. Whether a structure meets that standard is determined by a simple equation: assess the current maintenance backlog and divide it by the cost of replacement. Any value higher than 15 requires action and funding for correction. For example, a maintenance backlog of 20 and a replacement value of 100 would yield a result of 20, which is referred to as a Facility Condition Index. [FCI]. In this case, the FCI would be 20, and there is an implicit need to spend 5 to bring the FCI level to 15.<sup>9</sup> **The average of all the 60s era Comfort stations is 55.** This FCI level means that it will cost nearly half of their replacement value to return them to a serviceable level. Add to this that the Public Works Department indicates that these maintenance values, based upon experience, need to be increased by 50%. This results in an implied FCI of 83. [At an FCI of 100, the cost to repair equals the cost to replace.] Well over half of the CS have an FCI in a range where no one would purposely spend money to repair them given the magnitude of the costs. **It must be noted that the FCA analysis did NOT include ADA assessments. As such, the FCI is likely appreciably higher on many if not all of the Balboa Park CS.**

The City invests virtually nothing in the maintenance of the Balboa Park CS.<sup>10</sup> With such little investment, it is no surprise that the Facilities Condition Assessments completed in 2016 show a current capital renewal requirement, more than \$8,000,000 for these 23 Balboa Park Comfort Stations as determined by the City FCA results. Note the FCI value compared to the City Council Service Level Standard, 15:<sup>11</sup>

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<sup>8</sup>Facilities Condition Assessments [FCAs] -Balboa Park Analysis, René A. Smith, July 18, 2018.

<sup>9</sup> It is well understood that the FCA only provided analysis of the Likelihood of Failure [LoF], devolving into an FCI. It did not include the values for Consequence of Failure [CoF], a much more complex and nuanced analysis which is yet to be completed. However, given the size of the LoF for the CS, and the scope of the FCA requirements, as well as the various qualitative dimensions, there can be no doubt that this is an issue of significant proportions. CoF discussions are, necessarily, beyond the scope of this report.

<sup>10</sup> Detailed Public Works Maintenance records analysis indicates an average maintenance cost of approximately \$1,000 per year per Comfort Station over the period 2012-2017. This was corroborated separately by reviewing the 2018 Balboa Park CS Work Orders.

<sup>11</sup> Other CS, to bring the total to 23, are either in City staff occupied areas or the Golf Courses. Golf Course facilities are funded by the Golf Course Enterprise fund, i.e., golf course fees and other revenue sources, and not the City General or Consolidated Infrastructure Plan [CIP] fund.



|   |    |
|---|----|
| Comfort Station. Balboa Park. 6th and Thorn. Near Tiny Tot Area. Balboa Park Campus | 77 |
| Comfort Station. Morley Field. South of Tennis Club. Balboa Park Campus             | 70 |
| Comfort Station. Balboa Park. Archery Range. Balboa Park Campus                     | 68 |
| Comfort Station. Arbor Grove. Balboa Park Campus                                    | 67 |
| Comfort Station. Pepper Grove. South. Balboa Park Campus                            | 65 |
| Comfort Station. Morley Field Velodrome. Balboa Park Campus                         | 63 |
| Comfort Station. Balboa Park. 28th and Beech. Balboa Park Campus                    | 63 |
| Comfort Station. Morley Field. Schneider and Jacaranda. Balboa Park Campus          | 62 |
| Comfort Station and Maintenance Shop. Balboa Park Golf Course. Balboa Park. Campus  | 61 |
| Comfort Station. Pepper Grove. North. Balboa Park Campus                            | 61 |
| Comfort Station. Marston Point. Balboa Park Campus                                  | 60 |
| Comfort Station. Balboa Park. 6th and Redwood. Uptown Campus                        | 59 |
| Comfort Station. Morley Field. N.E. Corner Of Ball Park 1. Balboa Park Campus       | 57 |
| Comfort Station. Pine Grove. Balboa Park Campus                                     | 54 |
| Comfort Station. Balboa Park. 6th and Nutmeg. Balboa Park Campus                    | 46 |
| Comfort Station. Balboa Park. 28th and Grape. Balboa Park Campus                    | 35 |
| Comfort Station. Auto Museum southwest of. Balboa Park Campus                       | 28 |
| Comfort Station. Organ Pavilion. Balboa Park Campus                                 | 26 |
|   |    |
|   | 55 |

Another way to consider this data is to ask the question: if it will cost 50% or so of replacement cost to bring most of the current facilities up to 1960s standards, why wouldn't we see if we are over capacitated, and if so, reduce the number of CS, and rebuild to current standards and techniques? Why would we not develop a corollary program to enhance those CS that are structurally sound through a comprehensive structure rehabilitation program?

## Quantitative Aspects

Based upon the ability to obtain relevant data from the overall Balboa Park FCA Analysis, it was simplistically **assumed** that data would be readily available to create an economic analysis demonstrating the economic efficacy of a planned program of replacement of the CS. The analysis proceeded along these lines:

Can we not create an analysis showing cost efficiencies in replacement? [Perhaps.](#)

Initial conversations and reading identified four variables that might lead to cost-effective reduced costs by developing a planned program of significant replacement:

- a. Buy in bulk. For example, if you buy 8 CS, competition should give you a price break so that you can obtain 10 through aggressive contracting. It is not clear that the City uses available contracting methods such as the CMAS contract vehicle which may offer discounts of up to 15%. The feasibility of such a contract approach is beyond the scope of this assessment but certainly warrants close examination;
- b. Scrape several units that are either abandoned or lightly used, to reduce operational and maintenance costs;
- c. Provide lower costs for operations and maintenance over an extended period by modernization;
- d. Revitalize current units until they need to be entirely replaced by completely remodeling the interiors to reduce operational and maintenance costs.

Therefore,  $ax+by+cz+ \dots$  would yield an effective means for budget preparation and defense.

After months of interviews, data collection and analysis, it turns out that there is a weak correlation between the assumptions above and reality:

- a. There are **moderate** economies of scale. Given the nature of the construction, the economic advantages include contract preparation and administration, site preparation costs and construction efficiencies. Detailed discussions with national and international associations, contractors and other parks demonstrated that there is little likelihood that you can buy 8 and obtain 10. Perhaps, one might purchase 9. This result fits closely with the Public Works Department's assessment that using standardized designs will reduce costs by approximately \$50,000 per unit and reduce contract to completion time by five months. Nonetheless, obtaining a "free" CS for every nine or ten purchased is significant.

AND, the ability to define only limited economic benefits does not mean that they do not exist. There are as yet unquantifiable, financial savings resulting from bundling multiple Comfort Stations. There is, however, no known City of San Diego analysis that quantifies those benefits.<sup>12</sup> While no San Diego analysis may exist for defining the benefits, experience and competitive bidding will enable the savings to be identified.

- b. Scraping units do little to reduce the operational costs because individuals needing public facilities will just "go" to the next available toilet if they can make the walk. And, since there is virtually nothing spent annually on CS maintenance, there is no capital renewal advantage.
- c. Detailed discussions with City staff indicate that after a year or so, the operations and maintenance costs<sup>13</sup> of the new CS will be nearly identical to those of the current units.
- d. There has been no known analysis of an approach to revitalizing the existing structures. And, as seen above, there would be some economic benefit. A detailed Business Case Evaluation [BCE]<sup>14</sup> would include social benefits to counterbalance revitalization costs.

The motivation for this quantitative analysis was to identify verifiable economic benefits of scale. We discovered moderate benefits that can be identified and may increase as the project unfolds. When considered over the entirety of the City's 191 CS, even modest economic benefits can provide significant cost savings.

The City of San Diego has a forthcoming major CS redevelopment effort in Mission Bay Park. It should provide the means for a detailed, structured analysis that could ultimately give the requisite economic benefit data.

Additionally, there are Citywide implications. The City maintains 191 separate CS that are managed by Parks & Recreation. The development of a City-wide public toilet strategy may lend itself to other models that prove more cost effective. For example, Sydney uses a blend of public and private sources for public toilet operations and maintenance.

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<sup>12</sup> City of San Diego Strategic Asset Management Plan, June 2018.

<sup>13</sup> Comfort Stations capital renewal -under \$25K per year for all Balboa Park CS. Capital renewal consists of facilities maintenance and does not include annual Consolidated Infrastructure Program funding.

<sup>14</sup> City of San Diego Strategic Asset Management Plan, June 2018. App D, P. 58 – Business Case Evaluation

## Additoinal Iussues Needing Further Analysis

Are we over-capacitated in Balboa Park with Comfort Stations? [Unknown.](#)

The first approach was to define Standards since any quantitative analysis must include some form of reference. The best that could be obtained were comments such as “there probably should be toilets no more than 500 meters apart in heavily traffic park areas.”<sup>15</sup> No sizing information was provided. Therefore, any recommendations regarding the number and size of units will, necessarily, confront arguments regarding the sufficiency of number and size. I can find no way around that problem beyond local community engagement. Possibly, the Mission Bay analysis could be beneficial in this regard.

We looked at historical operational information. Since there is no count taken of CS usage in any of the Parks, the best that could be obtained was a relative measure of consumable supplies. Unfortunately, accounting for these supplies is by general park area, not specific CS but it was a start. Interviews with Grounds Maintenance Supervisors and other Park staff allowed for a generalized determination regarding usage.<sup>16</sup> Also, since some CSs have been closed for years, it is reasonably certain that they need not be replaced.

If we are overcapacitated, another question was: what should be done with the unused or unneeded CS? The best available answer is to abandon them in place, shuttered, with exteriors minimally maintained. Since there is already minimal maintenance to any of the CS, this is not a significant additional cost. And, years in the future, park usage may shift, and the electrical and sewer and water utilities will be, roughly, in place.

Which Comfort Stations should [be replaced](#) and in which order? [Heuristics.](#)

Discussions with Park staff led to an informal agreement as to the rank order in which the CS should be replaced. The first one, Arbor Grove, is listed as Priority 0 since it is currently used, under lease, for the Disc Golf park area.

Below pictures are of the Public Toilet at the Disc Golf Course. It is hard to believe Balboa Park was one of the first Disc Golf Courses created. People travel from across the country to visit it. Does one wonder what they think when they see the building? Note that the deteriorating roof, which leaks into the leased space, has been “patched” temporarily. And, the restroom would not meet ADA standards being unusable for a woman in a wheelchair.



Since the overwhelming majority of CS have FCIs exceeding 50, operational experience is considered the most appropriate gauge for CS replacement or modernization priority.

<sup>15</sup> Conversations with various organizations: American Restroom Association, PHLUSH, and SuSanA. Contact information provided in supporting materials.

<sup>16</sup> Detailed operations data was provided by Parks & Recreation. Those data are summarized in the attachment. Suffice it to say that the City spends more on toilet paper and consumables – about \$1M- in Balboa Park

| Comfort Stations Title  | Priority |
|---|----------|
|   |          |
| Comfort Station. Arbor Grove. Balboa Park Campus                                      | 0        |
| Comfort Station. Auto Museum southwest of. Balboa Park Campus                         | 1        |
| Comfort Station. Morley Field. N.E. Corner Of Ball Park 1. Balboa Park Campus         | 2        |
| Comfort Station. Pepper Grove. South. Balboa Park Campus                              | 3        |
| Comfort Station. Balboa Park. 28th and Beech. Balboa Park Campus                      | 4        |
| Comfort Station. Pepper Grove. North. Balboa Park Campus                              | 5        |
| Comfort Station. Morley Field. South of Tennis Club. Balboa Park Campus               | 6        |
| Comfort Station. Morley Field Velodrome. Balboa Park Campus                           | 7        |
|   |          |
| Comfort Station. Morley Field. Schneider Hill and Jacaranda Drive. Balboa Park Campus | 8        |
| Comfort Station. Marston Point. Balboa Park Campus                                    | 9        |
| Comfort Station. Balboa Park. 28th and Grape. Balboa Park Campus                      | 10       |

This list is notable since it does not reflect the precise rank ordering results from the FCA analysis. For example, the CS south of the tennis club, not included above, is well maintained by the lessee but has a high FCI in the analysis.

Of course, the City of San Diego is not the only local entity facing such expenses.<sup>17</sup>

Conversely, when local citizens undertake projects on their initiative, the costs are significantly less, the quality of the product is at least comparable, and local agency is enhanced. The best recent example of that is the Kellogg Park CS project.<sup>18</sup>

Further, increased costs have a perverse effect on replacement. If the replacement costs cannot be reduced, then the FCIs decrease and don't appear to be as bad. Nonetheless, the CS in Balboa Park is uniformly unsatisfactory.

Can we obtain better data? Mission Bay as the Test Case.

A new, near term reality approaches. With a plan to replace 7-9 CS in Mission Bay Park, there is a perfect test case in which to identify likely benefits and to challenge the above information.

One recommendation will be to benchmark all processes related to the Mission Bay Comfort Stations, use the "to be approved CS standardized specifications", use an aggressively competitive contracting process, develop a Case Study and use that analysis to drive further planning for CS citywide. This suggestion should not stand in the way of pursuing solutions to the Balboa Park current CS situation.

## Qualitative Aspects

Any comprehensive evaluation must incorporate qualitative aspects to determine the overall effect of any public decision. While societal impacts are not always easily quantifiable, their absence in studies often leads to

<sup>17</sup> Costly San Diego example. <https://www.latimes.com/local/lanow/la-me-restroom-san-diego-20171113-story.html#nws=mcnewsletter>. One can only wonder if San Diego Comfort Station procurements really reflect other city's experience, particularly in Southern California. An analysis of Los Angeles experience could be useful.

<sup>18</sup> See specific, positive discussion in Defined by Design, Anthony, pp.152-3, 251.

inappropriate conclusions. For example, a detailed analysis of the societal costs of the Hepatitis A outbreak in San Diego is not included in this evaluation, but all can agree that any consideration of the effects of public health upon the community must be a consideration in a comprehensive review of public toilets.

That said, several distinct qualitative aspects need to be considered in any comprehensive City of San Diego approach to Comfort Stations. These include infrastructure funding, City comparisons, City-wide issue, community involvement, contracting approaches, homelessness, and some other relevant considerations. This analysis attempts to define those issues. Some need to be analyzed relative to Balboa Park CS; others need to be part of a City-Wide plan.

Infrastructure funding. Consolidated Infrastructure Program [CIP] and Capital Renewal.

CIP: This topic is included in the San Diego City Policy 800-14 that defines the City’s approach to infrastructure planning and funding. This approach essentially divides the City facilities into three categories: Transportation, Health & Public Safety and All Others. Parks and Recreation facilities are the most obvious examples of the third category. They will consistently be underfunded as a matter of public design since the first two categories receive higher percentages in the 800-14 analyses. Comfort Stations, since they reside within the Real Estate Asset Owning Department of Parks & Recreation are categorized in this third category since Parks & Recreation is in the “All Others” category. This leads to the obvious question: should public toilets be included in the funding category, Public Safety, and Health?

Capital Renewal. Shouldn’t the City of San Diego have a specified Capital Renewal Account?

That subject is entirely beyond the scope of this analysis but suffice it to say that without a fenced replacement account, new projects will always receive more funding as opposed to the mundane needs of maintenance. As any car or homeowner knows, absent maintenance, your car or home will deteriorate at an escalating rate.

Citywide Implications – Other Cities: Develop a Public Toilet Strategy and Design Guidelines

While comparisons with other cities are always fraught, there are occasional transferable lessons. Perhaps the most important one that is a vision and a commitment to public health and sanitation from Sydney, Australia:

“The City of Sydney is committed to creating a **livable** and sustainable city that provides a high quality of life for its residents, visitors and businesses. The provision of public toilets contributes to the quality of the City’s public domain and its **livability**. The City’s vision is for a: “highly regarded, safe and accessible network of public toilets to meet the current and future needs of a world-class city.” There are 117 public toilets across the council area of which 54 are owned and managed by the City.”<sup>19</sup> This is a particularly apt comparison since San Diego owns and maintains 172 Comfort Stations. The comparison is useful:

| City         | Public Toilets | City-Owned/Managed | CS Strategy | CS Design  |
|--------------|----------------|--------------------|-------------|------------|
| San Diego    | 191            | 191                | No          | In Process |
| Sydney, AU   | 117            | 54                 | Yes         | Yes        |
| Brisbane, AU | NA             | NA                 | Yes         | Yes        |

<sup>19</sup> [https://www.cityofsydney.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0007/199816/2013-460160-02-Policy-Attachment-C-Public-Toilet-Strategy-Adopted.pdf](https://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0007/199816/2013-460160-02-Policy-Attachment-C-Public-Toilet-Strategy-Adopted.pdf)

This public health issue is a massive responsibility but with no clear “ownership” of the matter in San Diego City Government. Just as Sydney developed a long-term progressive approach to replacement and improvement of all of their CS, San Diego could do the same with committed leadership.

Another City with a forward-thinking approach to the issue is Brisbane, Australia which has created a useful Public Toilet Design Guideline.<sup>20</sup> Among U.S. cities, Portland, Salt Lake City, Raleigh-Durham, and the East Bay Park District stand out as having thought their way through many of the issues confronting metropolitan areas dealing with matters of public hygiene.

A citywide issue. [Who will take the lead?](#)

| Comfort Stations By District | CS Count | Council Member |
|------------------------------|----------|----------------|
| 1                            | 23       | Bry            |
| 2                            | 56       | Campbell       |
| 3                            | 31       | Ward           |
| 4                            | 12       | Montgomery     |
| 5                            | 19       | Kersey         |
| 6                            | 15       | Cate           |
| 7                            | 13       | Sherman        |
| 8                            | 8        | Moreno         |
| 9                            | 10       | Gomez          |

Local Community involvement. [A recent example to be improved upon.](#)

The recent construction process for the West Mesa CS presents some salutary lessons for all concerned. City staff, the Balboa Park Committee, the Balboa Park Improvement Committee, the local Planning Group, and several others knew that this effort was forthcoming. And yet, the process did not engage the community positively. While what is being built, will likely be acceptable, the process did not engage the community positively. The upcoming CS project in Balboa park should engage the community in a more considered manner. For future discussion, how do you customize the exterior for a local community while achieving standardized design efficiencies? How limited can the community input be and still be effective?

Contracting approaches. [Design-Bid-Build versus Design-Build.](#) Further to the West Mesa CS, this recent contract demonstrates some of the classic issues with low bid Design-Bid-Build approaches. There should be a carefully conceived strategy going forward for all CS acquisitions. Based on their conditions, the CS acquisitions should start with Balboa Park.

Are Citywide efforts considering Public Toilets?

A public toilet strategy with overlapping area distance maps, hours of operation, kiosk information and website access are all essential considerations on this subject.

<sup>20</sup> [https://www.brisbane.qld.gov.au/sites/default/files/public\\_toilet\\_design\\_guidelines\\_updated.pdf](https://www.brisbane.qld.gov.au/sites/default/files/public_toilet_design_guidelines_updated.pdf)

## Other Relevant Considerations

Call them Public Toilets. This report identified a series of other, complex and interrelated issues worthy of Citywide consideration regarding public toilets. Perhaps the first issue might be to start referring to them as Public Toilets for there is little comfort to be obtained in the overwhelming majority of the euphemistically called “Comfort Stations.”

Design effects upon operational costs. There is a clear relationship between the design of public toilets and their operational costs. This paper does not consider those costs, but the author is engaged in the work to standardize public toilet design in a manner that will serve to reduce operational costs.

### ADA Standards

This is an area of specialization that cannot be adequately addressed in this paper. It can only be noted as a matter of concern to be assessed within any planned program of improvement. Also, the lack of ADA compliance needs to be a consideration as the Balboa project is considered.

### Standardized Design:

The lengthy effort is nearing completion. But now, the hard work of engagement begins. We can and should develop a comprehensive Public Toilet Strategy and Design Guidelines.

A Single Point of Contact. The City needs to have an individual who will be a point of contact, is conversant with the issues above and who will be the go-to person.

One construct could be a Parks & Recreation newly created and fully funded position, reporting directly and specifically to the Parks & Recreation management and having direct reporting access to Mayoral Senior staff. Alternatively, it could be a Mayoral appointment, but those tend to be shifted and deemphasized with passing mayoral incumbencies.

## Results of the Analysis – Recapitulation

At the beginning of this report, several outcomes were identified for this report. This table and its notes reflect those outcomes. Details of each item are available.

### Recapitulation of Necessary Actions to Develop a Comprehensive Approach to Public Toilets

|   | Topic                              | Lead Department | Contributing Department | City or BP | Notes   |
|---|------------------------------------|-----------------|-------------------------|------------|---|
| 1 | CS Design Finalization             | PWD             | P&R                     | City       |   |
| 2 | Contract Approach                  | PWD             | P&R                     | City       |   |
| 3 | Funding Strategy                   | PWD             | P&R                     | BP         | Mayoral staff engagement                      |
| 4 | CS Needed                          | P&R             |                         | BP         |   |
| 5 | CS Configuration and Sizing        | P&R             | PWD                     | BP         |   |
| 6 | CS Replacement Order               | P&R             | PWD                     | BP         | Demand matrix, ADA, coverage, condition, etc. |
| 7 | Economic Analysis – Mission Bay CS | P&R             | PWD                     | City       | Template, data capture, analysis              |
| 8 | Public Toilet Strategy             | Mayoral         | P&R/PWD                 | City       |   |
| 9 | Single City POC for CS             | Mayoral         |                         | City       |   |
|   |                                    |                 |                         |            |   |

### 1. CS Design Finalization and Implementation

For there to be a successful CS Design, buy-in from various constituencies will be required. This includes not only local experts but industry and association engagement. This should lead to the creation of a Public Toilet Design Specification Handbook for Citywide application. Obtain concurrence on the prefabricated designs by a wide-ranging collection of knowledgeable and concerned citizens. Engage with national organizations on the subject and ask industry to evaluate the designs for construction efficiencies.

One important aspect of this task is Community Engagement. There was significant pushback from the West Mesa local community regarding the size and the façade on the two new CS. Council policy on public engagement should be reviewed. And, there needs to be a mechanism to engage local constituencies citywide on this issue so that early buy-in can be obtained and sustained.

### 2. Contract Approach

There needs to be a mechanism to avoid the expensive lessons from the West Mesa Comfort Station procurements. A contracting approach, specific to Comfort Stations needs to be developed. The City needs to retain the capacity to determine whether a responder is responsive or non-responsive. Attached is a description of efficient and cost effective, readily available contracting tools which can be used.

### 3. Funding Strategy

Determinations need to be made as to whether to fund capital renewal or whether to replace each specific CS. Those determinations will then lead to specific funding requirements from different funding sources. Once that is scoped, and the next several steps are completed, a budgeting plan over several years can be developed, justified, received and executed. It all must be done with transparency.

There are structural deficiencies in Infrastructure funding mechanisms. An analysis should be conducted to analyze them and report back to the Mayor and the City Council on recommendations. As but one example, there is no Capital Renewal Annual Budget line item which is protected.

Epidemiological analysis of the Hepatitis A outbreak and the degree to which the lack of appropriate public toilets exacerbated the disaster. It is an assumption that the lack of proper public toilets increased the outbreak. A review of medical analysis should be completed and made public. Such an analysis might lead to consideration to include Public Toilets in Category 1, Public Health and Safety for Infrastructure Funding analysis.

### 4. CS Needed

Using the geolocation map and the recommended 500-meter radius recommendations, a walking analysis should be completed to determine any areas needing wholly new CS and whether there are any apparent overlaps. That should then determine the number of required CS. This may lead to the closure of some CS, reopening of some CS, or the request for an entirely new CS. For example, to revitalize the East Mesa area of the Arizona Landfill, there should be a CS located there, perhaps two.

### 5. CS Configuration and Sizing

For each desired CS location, there needs to be a determination as to the overall configuration and size of the facility to include whether there is a Maintenance Worker shed, whether there is a Concession stand, whether there are showers, the number of stalls, ADA considerations, etc.

### 6. CS Replacement Order

Since there will be insufficient funds to replace or repair all of the CS in Balboa Park in one funding cycle, a planned program of replacement should be established.



## 7. Economic Analysis – Mission Bay CS

The Mission Bay CS upgrade strategy presents the best opportunity in decades to collect data that can be analyzed and serve as a template for future decision making. IBA should be engaged to define the data requirements and to follow-up on the effort. This should make the EA case for replacement clear.

## 8. Public Toilet Strategy

1. To become a World Class City, San Diego needs to develop a Public Toilet Strategy similar to that developed by Sydney Australia. And, it should ask questions that challenge the current approach to CS citywide. Are we using the best and most efficient models? Put initial funding in the 2020 Consolidated Infrastructure Program budget to complete a detailed analysis and commence work as indicated above. Develop a multi-year planned program of objectives and milestones for an effort to create a Citywide Public Toilet Strategy.
2. Revise Council Policy 800-14. It is nearly six years old and is outdated. It does not provide sufficient weight for cost economies of scale and does not sufficiently address all aspects of weighting public health in deciding how to spend infrastructure dollars. The City Staff analyzed the policy and made recommendations. Work to implement those recommendations.
3. The developing Parks Master Plan should consider these issues when it makes its recommendations.

## 9. Single City POC for CS

There should be a designee on the Mayoral staff who understands the complexities of public toilet implementation. While Mayors and staffs change, entities such as the City Auditor and IBA can assist in maintaining a high-level focus

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## Conclusions

The City should embark on the Balboa project in the short run and to begin the city-wide project analysis. Any analysis should cover least, most and likely outcomes. While it is to be hoped that the City of San Diego develops a comprehensive Public Toilet Strategy, history demonstrates that such outcomes are problematic. We should, however, reverse our history of not acting until there is some disastrous public health event attributable to the absence of appropriate public toilets. Progress must not be tied to negative Public Relations after an article appears on page one of the New York Times.<sup>21</sup>; or the San Diego Tourism industry notes that public health issues are affecting institutional bottom lines. Downtown homelessness has not been solved by such concerns beyond driving the homeless into nearby parks and communities.

Now is the time to create a planned approach for design finalization, decision making between replacement and rehabilitation, an effective contract management approach, and a robust funding strategy.

Why should we delay further?

## Acknowledgments

No project such as this can exist without support from myriad sources. Here are a few:

First and foremost, my sincerest thanks to the hard-working, committed, overworked, and underappreciated City staff members who supported me in this lengthy effort. While they might not agree with what is said here, they were always professional, courteous, and supportive in my numerous requests for data and understanding. To

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<sup>21</sup> <https://www.nytimes.com/2004/09/07/us/sunny-san-diego-finds-itself-being-viewed-as-a-kind-of-enronbythesea.html>

<sup>22</sup> <https://www.nytimes.com/2017/09/08/us/california-today-a-deadly-outbreak-stalks-san-diego.html>

save them embarrassment by this report's shortcomings, let me simply thank the many members of the Parks & Recreation and Public Works Departments for their unstinting support.

Organizations: I drew on the capacious resources of PHLUSH [Public Health Let's Us Stay Human], Carol McCreary, the American Restroom Association, Steve Soifer, SuSanA [the Sustainable Sanitation Alliance], Dr. Elizabeth Muench, and Think Dignity. Further, my work has been assisted by groundbreaking efforts in this area by the East Bay Park District, Salt Lake City Parks & Recreation, the City of Raleigh-Durham Parks and Recreation. And, of course, the New York City Central Park Conservancy and Parks & Recreation.

Before this, there was Mary Monk-Cokeley. She is fighting the good fight for human dignity, efficiency and effectiveness in San Diego public sanitation for decades. From her international recognition for her work on both the Kellogg Park structures to the Portland Loos, she is THE voice for bringing rationality to the Comfort Stations design, development, funding and construction program in the City of San Diego. She is and has been ably assisted by Don Goertz, AIA.

While all errors are mine alone, I am deeply grateful for the unstinting support I received from Del Rey Systems & Technology, Inc. on this and its antecedent analyses. Their careful reading, comments, editing and formatting made this a more compelling and much clearer report.

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## Attachments

### 1. Comfort Stations [Public Toilets] Procurement Process Efficiencies

#### **Introduction.**

Recent procurement experience with the Balboa Park West Mesa Comfort Stations indicates that there might be a better means of acquisition. The City used the classic Design-Bid-Build process which, I believe, can be improved. This paper's purpose is not to criticize that effort and result. Plenty of people worked hard to bring about the much needed replacement of these public toilets.

The purpose rather is to suggest a means to efficiently acquire multiple public toilets through streamlined procurement processes. Further, this is not to imply that the City of San Diego Public Works Department is unaware of or hasn't used these vehicles. Rather, it is to suggest a means to develop a citywide plan of action to efficiently upgrade many of the 191 public toilets that the city owns through a streamlined acquisition approach.

There are many alternative approaches available to municipalities that leverage the significant buying power of all levels of government. The most obvious one is the massive Federal Government Supply Schedules. These are available through GSA Alliance as implemented by the State of California Department of General Services California Multiple Award Schedules (CMAS) program. There is the popular [and used by the City of San Diego] Sourcewell contract mechanism which can be tied to Sourcewell's ezIQ Contract vehicle. There is also the BidBoard. Each of these will be discussed in this memorandum with suggestions as to their best use and application.

#### **Approach.**

The key is to predetermine the appropriate contract strategy in order to find the best contracting tool. For reasons unknown to this author, the City of San Diego chose to use a Design-Bid-Build strategy for the purchase of the two Balboa Park West Mesa Comfort Stations. Whatever the rationale, here is a set of counter rationales for future public toilet purchases using the more straightforward Design-Build strategy.

In the first instance, the Real Estate Asset Managing Department (Park & Recreation) and Public Works Department should decide whether prefabricated units are appropriate. If they are not appropriate, then Site built public toilets should be purchased. But, they should be purchased using a Design-Build contract strategy. There is just too much literature and analysis demonstrating the myriad benefits of the Design-Build approach.<sup>23</sup> Criteria for making that decision are beyond the scope of this paper.

As best as I can determine, there are two tracks that can be taken: purchase prefabricated units or purchase site built units.

#### **Track 1: Procuring Prefabricated Public Toilets Economically**

I will use CXT as the specific example in this case. This is not an endorsement but since they are large, national and have a proven track record in California<sup>24</sup>, they are an appropriate illustration of the process suggested.

Track 1A: Procure the building through Sourcewell including the scrape, reconnect and pad.

This requires a two step process using sourcewell. First, purchase the appropriate public toilet.

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<sup>23</sup> <http://www.beckgroup.com/wp-content/uploads/2015/06/DesignBuildVsDesignBidBuild.pdf>

<sup>24</sup> East Bay Regional Park District purchases of CXT prefabricated public toilets

<https://www.sourcewell-mn.gov/cooperative-purchasing/030117-cxt>

<https://www.sourcewell-mn.gov/sites/default/files/2018-05/CXT-Pricing-Combined%20Files.pdf>

Second, procure the site work through ezIQ Contracting. Preapproved contractors for San Diego County can be found at:

[https://www.sourcewell-mn.gov/cooperative-purchasing-eziqc/search?county=12401&eziqc\\_category=General+Contractor](https://www.sourcewell-mn.gov/cooperative-purchasing-eziqc/search?county=12401&eziqc_category=General+Contractor)

Sourcewell is set up to handle this type of two step procurement. POC there is Tony Glenns, 218-894-5491

CXT POCs are: Gary Burger, National Sales Manager, 254-717-0912 and Todd Weger, Western Sales, 509-703-3384

## **Track 2: Procuring Site Built Public Toilets Economically**

I will use ROMTEC as the specific example for this case. This isn't an endorsement but since they are doing the work on the Balboa Park West Mesa, it is conceivable that we could have arrived at the solution using ROMTEC with less construction cost, lower contract cost, fewer delays and less public concern.

Track 2A: Procure the building through CMAS including the scrape, reconnect and pad.

CMAS- the State of California, Department of General Services bolt-on to the Federal GSA Contract schedule. The City of San Diego is an authorized purchaser. The CMAS ROMTEC schedule currently being renegotiated but it is 4-04-54-0011A Supplement 4, <https://romtec.com/wp-content/uploads/2017/10/romtec-cmas-award-contract.pdf>.

The pricing for the various building types is at: GS-07F-0095M, Category 361 10 H, <https://www.gsaelibrary.gsa.gov/ElibMain/home.dohttp://www.gsaelibrary.gsa.gov/ElibMain/contractorInfo.do;jsessionid=V+ARZXmSZq4zKG-CJoX1II80.prd1pweb64?contractNumber=GS-07F-0095M&contractorName=ROMTEC%2C+INC.&executeQuery=YES>

Sort the ROMTEC GSA Advantage items listing by inverse cost to have the buildings pop to the top of the list.

Pricing for CMAS Options is as follows:

The problem with the CMAS contract is that the amount allowed for the scrape, reconnect and pad work is unrealistically low. Hence, Track 2B should be considered.

Track 2B: Procure the building through CMAS but buy the scrape, reconnect and pad separately.

Since ROMTEC has a group that only does this type of construction work, some cities have found it beneficial to follow this approach. One should check with the City of Alameda to determine the mechanism that they used.

Track 2C: Procure the building through Buy Board

Buy Board is a National Purchasing Cooperative of which the City of San Diego is a member. [<https://www.buyboard.com/National.aspx>]. Their records do not indicate that the City has used them to procure any public toilets. However, because of the manner in which the Buy Board works, i.e., the municipalities are to self-report, it is possible that the City has used their vehicle for public toilet purchases. In California, the cities of

La Habra, Lakewood, Chino, Yorba Linda and Hollister have used them for public toilet purchases as have Park Districts such as Sacramento County, Buttonwood, and Santa Cruz County.

The mechanism is straightforward. A member can obtain price lists and the contract allows for all of the earlier described project aspects except for demolition which would need to be a separate activity.

Buy Board POC: Steve Fisher, 800-695-2919

ROMTEC POCs are Kris Lamar, and Travis Olson 541-496-3541

## 2. Additional Photographs and Data



### Other Data

| Balboa Park Comfort Stations Material Use Information |                  |             |
|---|------------------|-------------|
| Annual Toilet Paper Cost                              | \$ 250,000       |             |
| Sheets of Toilet Paper Used                           | 15,300,000       |             |
| Number of Toilet Uses                                 | <b>1,500,000</b> | Approximate |
| Amount spent on Cleaning Supplies                     | \$ 400,000       | Guesstimate |
| Amount spent on Other Supplies                        | 150,000          | Guesstimate |
| Total P&R CS Supplies Annual Cost                     | \$ 1,000,000.00  |             |

| <b>Balboa Park Comfort Stations Cleaning Labor Costs Estimate</b> |                    |                     |
|---|--------------------|---------------------|
| <b>Complete Cleanings</b>   |                    |                     |
| Summer Cleanings per day  | 2                  | 2                   |
| Times Number of CS  | 18                 | \$ 440,640          |
| Winter Cleanings = 1/2  |                    | \$ 220,320          |
|   |                    |                     |
| Total CS Complete Cleanings Labor                                 |                    | \$ 660,960          |
|   |                    |                     |
| <b>Partial Cleanings</b>  |                    |                     |
| Summer Cleanings per day  | 2                  | 2                   |
| Times Number of CS  | 22                 | \$ 134,640          |
| Winter Cleanings = 1/2  |                    | \$ 67,320           |
|   |                    |                     |
| Total CS Partial Cleaning Labor                                   |                    | \$ 201,960          |
|   |                    |                     |
| <b>Total Labor Cost of Cleaning</b>                               | <b>Approximate</b> | <b>\$ 862,920</b>   |
|   |                    |                     |
| <b>All 191 City Comfort Stations</b>                              | <b>Assumed</b>     | <b>\$ 7,491,715</b> |

| <b>PWD CS Costs - 2018 Citywide</b>           |            |
|---|------------|
| 191 CS  | 191        |
| 700 Work Orders                               | 700        |
| 150000 labor                                  | 150000     |
| Material estimated                            | 28125      |
| PWD Costs                                     | \$ 178,125 |
| PWD Costs / CS/Year                           | \$ 933     |
| BP CS PWD Costs- Estimated                    | \$ 20,517  |
|   |            |
|   |            |
| <b>PWD Costs - 2012-2017 Balboa Park Only</b> |            |
| 23 CS   | 23         |
| Work orders                                   | 583        |
| Labor Cost                                    | \$ 64,000  |
| Material Cost                                 | \$ 12,000  |
| Total Cost                                    | \$ 76,000  |
| PWD Costs/CS/Year                             | \$ 661     |

### 3. Miscellaneous Thoughts and Data

The City of San Diego has responsibility for approximately 1,800 structures. 117 of them are in Balboa Park. 191 of them citywide are public toilets.

The City has no Capital Renewal Account, so work levels change every year depending upon budgeting exigencies. While the inadequacies of such an approach are significant, the analysis for that is too complex for this paper. But, it should be noted that the following staff levels exist for the maintenance of those structures:

| Trade       | 2019 Budget | Salary Range (Thousands) |
|-------------|-------------|--------------------------|
| Carpenter   | 17          | 45-53                    |
| Electrician | 18          | 49-58                    |
| Painter     | 18          | 43-52                    |
| Plumber     | 14          | 49-58                    |
| Roofer      | 7           | 41-49                    |

Is it any wonder why so little maintenance is done in the Balboa Park Comfort Stations?

CS Balboa Park location information:

The Central Mesa, with its plethora of institutions and attractions, draws the largest concentration of visitors and, not surprisingly, has the largest numbers of public access restrooms. The Central Mesa is and will be doing quite well. Further, two of the West Mesa Comfort Stations will completely replace two outdated 60s era CS.

Therefore, attention needs to focus on creating planned replacements for the CS in East Mesa and, to a lesser degree, the West Mesa.

By a rough count, there are approximately 57 restrooms available to Balboa Park Visitors. While this report analyzes the 23 Stand-alone Buildings it is worth noting the existence of all restrooms in the Park and their specific locations as reflected in the below table:

| <b>Comfort Stations/Restrooms By Category</b>  | <b>West Mesa</b> | <b>Central Mesa</b> | <b>East Mesa</b> |
|--|------------------|---------------------|------------------|
|  |                  |                     |                  |
| <b>Comfort Stations- Stand Alone Buildings</b>   | <b>9</b>         | <b>3</b>            | <b>11</b>        |
|  |                  |                     |                  |
| <b>Restrooms Open to the Public during normal operating hours</b>                            | <b>0</b>         | <b>19</b>           | <b>3</b>         |
|  |                  |                     |                  |
| <b>Restrooms Open to the Public - Pay to Enter Institutions</b>                              | <b>0</b>         | <b>8</b>            | <b>0</b>         |
|  |                  |                     |                  |
| <b>Restrooms Closed to the Public - In Park Buildings - Not Stand Alone Comfort Stations</b> | <b>3</b>         | <b>0</b>            | <b>1</b>         |
|  |                  |                     |                  |
| <b>Totals</b>  | <b>12</b>        | <b>30</b>           | <b>15</b>        |
|  |                  |                     |                  |
| <b>Grand Total</b>   | <b>57</b>        |                     |                  |

Several things become clear. First, a total of 57 restrooms is a large number. For comparison, New York's Central Park, approximately the same size but with significantly more annual visitors, has 21.<sup>25 26</sup> These include both stand-alone and in Park buildings restrooms. Additionally, while 90% of Balboa Park Visitors are local, only 67% of Central Park Visitors are local. By implication, there should be less need for CS in Balboa Park compared to Central Park, and yet there are at least two times as many. This observation, of course, is subject to challenge.

Next, the standalone and other CS in the West Mesa is likely too many just in comparison to the nature of the differences in geography between East and West Mesa. That likely explains why some CS in the West Mesa has been shuttered for years without significant complaint.

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<sup>25</sup> <https://www.nycgovparks.org/parks/central-park/facilities/bathrooms>