



Save Our Heritage Organisation

Saving San Diego's Past for the Future

March 22, 2012

Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
via email: DSDEAS@sandiego.gov

Subject: Comments on Draft EIR
Balboa Park Plaza de Panama Project

Dear Ms. Shearer-Nguyen:

Please accept these comments submitted on behalf of the thousands of members and supporters of Save Our Heritage Organization (SOHO) regarding the Plaza de Panama Project Draft EIR, and respond to each comment individually. SOHO is a California nonprofit corporation formed in 1969 to lead the San Diego community as a catalyst for historic preservation by raising awareness and appreciation of the region's rich architectural and cultural heritage.

1. *Narrow Project Objective.* The initial impetus for the Plaza de Panama project was to remove parking from the Plaza de Panama, as long-desired and long-planned by the City and as reflected in its prior comprehensive planning documents. Does not the add-on project objective suggested by the Plaza de Panama Committee to remove all traffic from the Plaza de Panama, which was not a part of the fundamental project vision, create an improperly narrow objective that restricts the fair analysis of alternatives? (*City of Santee v. County of San Diego; In Re Bay Delta.*)

2. *Analysis of Impacts.* The Draft EIR inadequately analyzes impacts:

- The proposed project site is within the boundaries of a National Historic Landmark District (NHLD). The nature and extent of the project's unmitigable impacts to NHLD integrity have an inadequate baseline and have been segmented in a way that avoids assessment of cumulative impacts to the NHLD as a whole. Please revise the EIR to provide integrated analysis of the impacts of the project and each alternative to the NHLD as a whole, or explain why this is not necessary to comply with CEQA.
- The EIR fails to analyze or acknowledge many impacts relating to the visual and physical intrusions of the project's new massive modern infrastructure and altered

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landforms. The EIR provides inadequate analysis and no factual justification for its conclusions that project impacts to the historic setting, historic views, spatial relationships, and to the feeling, association, and materials of the NHLD are less than significant. The EIR should be revised to adequately assess impacts relating to each of the following: the proposed bypass bridge, regrading of the Plaza de Panama, mall, and Alcazar Garden parking lot, the organ pavilion parking structure, the road area between the Houses of Pacific Relations, the addition of the bypass road, modern paving materials, plant materials, retaining walls, guard rails, railings, barriers, new structures, and the introduction of modern elements and water features wholly unlike and not compatible with the historic appearance of the NHLD.

- The EIR should be revised to acknowledge, analyze, and mitigate the proposed project's intrusive new construction that would alter the character-defining features of the cultural landscape to a degree that would render the landscape unrecognizable as the setting for the 1915 and 1935 expositions. If not, why not?
- The EIR should be revised to acknowledge that the project's proposed changes to the NHLD are not consistent with its period of significance, were not contemplated by the park's original designers, are not compatible with the original design and would result in adverse unmitigable impacts.
- Please revise the EIR to correct the project's inappropriate reliance on screening adverse impacts with non-historic ephemeral trees and vegetation. Plants and trees are not permanent fixtures in the historic environment.
- None of the proposed project's components contribute to restoration of elements or materials present during the park's period of historic significance and therefore do not mitigate impacts. The sole exception is some lampposts, which are nonetheless inaccurate in terms of materials and some locations, creating a false sense of history.
- This project does not meet Secretary of the *Interior's Standards for Rehabilitation*. Conclusions in the Draft EIR to the contrary are wrong and must be corrected and impacts correctly acknowledged as unmitigable.
- The EIR should be revised to acknowledge that the *Secretary's Standards for Restoration and Preservation*, not *Rehabilitation*, are appropriate for this project within the NHLD. Please revise the Draft EIR to analyze project impacts pursuant to the *Standards for Restoration and Preservation* and include the following explanation:

Secretary of the Interior Standards for the Treatment of Historic Properties

Four Treatment Approaches

There are Standards for four distinct, but interrelated approaches to the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction.

- **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization have now been consolidated under this treatment.)
- **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

The guidelines from the National Park Service for selecting the appropriate Standards state, "Choosing an appropriate treatment for a historic building or landscape, whether preservation, rehabilitation, restoration, or reconstruction, is critical." The questions that follow pertain specifically to historic buildings, but the process of decision-making would be similar for other property types

- *Relative importance in history.*
- *Is the building a nationally significant resource?*
- *A rare survivor or the work of a master architect or craftsman?*
- *Did an important event take place in it?*

National Historic Landmarks, or many buildings individually listed in the National Register warrant Preservation or Restoration.

Buildings that contribute to the significance of a historic district but are not individually listed in the National Register more frequently undergo Rehabilitation for a compatible new use.

- Additional analysis of the following impacts should be provided:
 - Removal of historic hardscapes
 - The addition of extensive non-historic hardscapes and curbing
 - Removal of historic and potentially historic plants and trees
 - Extensive new landscaping with non-historic plantings
 - The reintroduction of the lawns in the Plaza de Panama in a non-historic configuration
 - Changes to the rim and slopes of Palm Canyon
 - Radical changes to the historic landforms
- The EIR should be revised to consider impacts relating to the project's likely disturbance of archaeological remains from both expositions as evidenced by above-ground remains in many locations. A comprehensive survey and research relating to buried historical resources has not been completed, the required research design has not been contemplated, and required field testing has not been conducted to serve as a basis for modification that might be required of the research design based on that testing. Please address each one of the archaeological impacts and concerns enumerated below:

1. A plan to fully excavate and document these resources must be implemented.
 2. Once this is completed the project must be redesigned to avoid archaeological resources so as not to preclude the eventual reconstruction of historic features and buildings.
 3. The EIR should acknowledge that the proposed project is in direct conflict will archaeological goals and removes many resources. The EIR should assess the nature and magnitude of unmitigable archaeological impacts not yet addressed in the EIR, and cannot rely upon mitigation monitoring to reduce impacts to a level of insignificance.
 4. The archaeological program outlined in the EIR for this project is contrary to the procedures required by the City's General Plan.
- The EIR should be revised to reflect the Spreckels Organ Pavilion's prominent setting and stature that would be severely diminished by the addition of a parking structure constructed level with its base. Noise impacts to the Pavilion from car alarms, screeching tires, car stereos, and traffic congestion relating to the proposed parking structure must be adequately addressed.
 - The EIR is inaccurate in its insupportable contention that changes contemplated by the proposed project are not permanent and irreversible defies logic and any reasonable analysis. Please revise the EIR to acknowledge that changes are irreversible or provide fact-based analysis to support any contrary contention.
 - The EIR must be revised to acknowledge that the proposed project prevents future restoration of the NHL to its period of significance. Impacts include but are not limited to the restoration or reconstruction of structures, preservation of their remains, preservation of archaeological resources, landforms, Palm Canyon, restoration of the original Cabrillo Canyon plantings and iconic character-defining viewscape, Palm Canyon bridge, pergolas, gardens, sight lines, reintroduction of historic hardscapes, landscapes, curbs, plant material, trees, lighting, materials, and access.
 - The EIR must be revised to analyze the project's impacts to reduce Heritage Tourism by diminishing the park's historic features, setting, obscuring historic features and authenticity.
 - The EIR must be revised to analyze the project's potential to result in the loss of the National Historic Landmark designation.
 - The EIR must be revised to analyze the project's potential to result in loss of priority for grant funding for local, state, and national grants.
 - The EIR must be revised to analyze the project's potential to result in loss of recreation opportunities for families and visitors due to new parking fees, since park parking has always been free. Balboa Park has always been important for San Diegans of limited means to enjoy on a regular basis.
 - The EIR should address the project's economic impacts to the San Diego region by rendering one of our most iconic and beautiful areas much less desirable and less attractive.

- The EIR should address impacts relating to the project's restriction of residents' and visitors' enjoyment of driving through the great arch into the heart of the historic park. Described by many as one of the greatest experiences that the region has to offer or "An experience that rivals the best of Europe." This method of visiting the historic core should be acknowledged as one of the major attractions in the San Diego region.
- The Archery Range is arguably historic and needs to be evaluated as a historic resource impacted by the proposed project.
- The project's impacts should be assessed relating to the bypass road grading and other land form changes to the site of the Kern and Tulare building along the Mall, to the site of the San Joaquin building, and to the site of the Alameda and Santa Clara building.
- The EIR inaccurately analyses effects and limitations on pedestrian access by extreme lengthening of the new Palm Canyon bridge, and should provide additional fact-based assessment.
- The EIR should include supplemental analysis of the effect on restricting pedestrian access from the Palisades to the Plaza de Panama during large events such as December Nights or Earth Day by the imposition of the Bypass road ditch, retaining walls, railing systems.
- The radius of the curves on the bypass road should be acknowledged both as currently substandard and illegal for any roadway including park roads and inadequate as a proposed major trans-park thoroughfare.
- The EIR should analyze traffic that would result from closing the Cabrillo Bridge, which SOHO believes will not increase in the Uptown area as stated in the EIR. Further analysis should address traffic routed up Park Boulevard from I-5, as it is most likely to occur.
- The EIR's tables and analyses showing comparisons between the proposed project and the alternatives are flawed, frequently relying on incorrect conclusory assumptions that the effects are similar to the proposed project without adequate separate analyses supporting its conclusion. Please revise the tables and supporting analysis.

3. Modified Precise Plan without Parking Structure Alternative. The EIR should be revised to correct mischaracterizations and inadequate analysis of Alternative 4Biii, as follows:

- This plan includes modification to the southern entrance road to allow 2-way traffic to enter and leave from both directions into the Alcazar parking lot.
- This plan provides 20 more spaces than currently exist in the Plaza de Panama and places them closer to the various museums than they had been previously or than would be provided in the proposed project.
- The managed traffic portion of the plan has been ignored in the EIR. This plan would

allow the Cabrillo Bridge, Plaza de Panama, and the West Prado to be car-free during the periods when most pedestrians are present. This results in a better pedestrian environment than the proposed project, with greater flexibility for park users, institutions, event producers, and surrounding neighborhoods. It allows visitors to experience the thrill of driving through the great Arch and enjoying the park from the automobile as was originally intended. When open, it facilitates cross park commuting and provides direct access to the Old Globe, museums, and restaurants.

- This plan significantly reduces pedestrian/vehicle conflicts. The EIR numbers should be re-evaluated, as there are calculation errors. The managed traffic component eliminates more conflicts than the proposed project.
- The proposed project introduces a more dangerous pedestrian/vehicle conflict where the proposed new bridge meets the Cabrillo Bridge
- This plan does not preclude or include the Spreckels Organ Pavilion parking structure.
- This plan does not anticipate any major regrading of the Alcazar Parking lots. No new retaining walls are planned.
- New ADA spaces for this lot would be created in the spaces next to the Alcazar garden and in existing ADA pathway.
- New ADA spaces would be created from existing spaces in the lot behind the Model Railroad museum and the Botanical building and new spaces would be created along Balboa way next to existing ADA pathways, minimizing the need for new grading.
- In addition to the area shown in the EIR illustration, new parking will be provided along the east side of the Alcazar Lot by relocating dumpsters.

The EIR should be revised to designate Alternative 4Biii as the environmentally superior alternative.

Thank you very much.

Sincerely,



Bruce Coons