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Subject: Balboa Park National Historic Landmark District DEIR

Dear Ms. Toothman,

A Draft Environmental Impact Report (DEIR) was issued on January 23, 2012 as required by the California Environmental Quality Act (CEQA). The public review period ends March 8, 2012. Refer to attached links to documentation. My office will respond in detail to the DEIR but I wanted to bring to your attention the public's involvement and concerns for the past 17 months or so.

Balboa Park was the location of the 1915 Panama-California Exposition and 1935 California Pacific International Exposition, which each created important architectural landmarks. The buildings are some of the finest Spanish Colonial Revival architecture extant and created an architectural movement that spread across the nation.

Balboa Park and the historic Exposition buildings were declared a National Historic Landmark and National Historic Landmark District in 1977.

In a quick review of the EIR with its 13 alternatives I have the following concerns:

- At great risk is the Cabrillo Bridge, its setting, the spatial relationships and special elements which define the National Historic Landmark District of Balboa Park.
- The Cabrillo Bridge was intended as the primary entrance to the 1915 Exposition, the bridge remains as the ceremonial entry.
- The Cabrillo Bridge, California Quadrangle, including the Fine Arts Building along with the canyon landscape, constitutes the main front entry to Balboa Park and the NHL district. It is the primary historic viewscape and sets the tone, conveys the setting, contains the signature elements and major character defining elements of the district. It is also the area of the Balboa Park NHLD that retains the very highest degree of original integrity, near 100%. This is the most sensitive possible area and alterations should be strictly avoided.

The proposed plan renders the site unable to convey its original design intent. The substantial and many changes represent elements that are incompatible, did not exist during the period of significance and prevent the district from retaining the qualities that resulted in the NHLD designation.

A preliminary review reveals a few of the inappropriate alterations to the district:

- Demolition of 82 feet of the Cabrillo Bridge
- Encasing and hiding from view the major character defining features of the front entrance of the Spanish fortified hilltop town.

- This incompatible intrusion of a new bridge element that would be attached to the iconic and historic Cabrillo Bridge.
- Insertion of new buildings, retaining walls, changed historic landforms, removal of historic plant materials, removal of the historic hardscapes and curbs.
- The significant introduction of new plants, trees and hardscapes not present during the period of significance or available during that period.
- The new bridge funnels traffic into what would become a heavily modified Alcazar Garden parking lot by changing the landscape, re-grading the land form and altering the garden's relationship to its setting, as well as adding multiple uses and small buildings for valet use.
- The introduction of a new two-lane roadway road that bisects the historic core into two spaces, something that has never existed and was never designed to be. This is achieved by excavating a very large ravine containing the road, bisecting the historic central mesa, which includes the addition of retaining walls and fills significant parts of Palm Canyon, altering the historic space and land forms irreversibly.
- The road continues into a three story partially underground parking lot that abuts directly against the historic Speckles Organ Pavilion. This parking lot will then have numerous new buildings on top along with grass areas. None of these elements occurred during the period of significance and represent materials and methods of construction unknown during that period. It irreversibly changes the relationship of the organ pavilion to the landscape and severely diminishes its prominent setting.

Although we will be offering comments, my personal experience and having completed several preservation projects within the park, there is no compelling need to inflict the proposed, irreparable damage to this National Historic Landmark District. The bypass road and bridge, paid parking lot and recirculation of vehicle traffic are not necessary to meet the stated goal of removing 54 parking spaces in the Plaza de Panama. Even if these were needed, they can be put elsewhere so that the public can enjoy its historic park as well as its museums.

This massive project composed of unnecessary, intrusive, and incompatible new construction severely impairs the public's ability to appreciate and understand the National Historic Landmark. Millions of visitors annually visit Balboa Park. Their experience and understanding of a remarkable historic setting would be impaired.

Should any or all of these impacts occur Balboa Park may no longer be eligible for listing as a National Historic Landmark District. The property will cease to meet the criteria as an NHLHD because the qualities, which caused it to be originally designated, may be lost or destroyed. All privileges conveyed by the NHLHD including protection, priorities for funding etc. may not be available.

As you have done with other National Historic Landmark Districts I am requesting that you review the DEIR documentation and offer your opinion. I realize that there may not be federal funds attached to this project, but the National Historic Landmark program rests with you and the protection of these resources, especially given the high involvement of the public, is paramount for your involvement.

Sincerely,

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

DEIR

http://google.sannet.gov/search?partialfields=&sort=date%3AD%3AS%3Ad1&proxyreload=1&num=100&requiredfields=STARTED:TRUE.ENDED:FALSE.PATH:CEQA&layout_type=datetitlelink&getfields=DOCUMENT_URL,TITLE,DOC_DATE&output=xml_no_dtd&ie=UTF-8&client=scs_ocd&filter=0&site=documents&config=ceqa.js&proxystylesheet=scs_ocd&q

FAQ about the EIR

http://www.balboapark.org/sites/default/files/plaza_de_panama_draft_eir_faq.pdf

Save Our Heritage Organisation's web site noting **media coverage** (may not be complete)

<http://sohosandiego.org/main/paaplazadepanama3.htm>

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