

March 22, 2012

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
Via email: DSDEAS@sandiego.gov

NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®
Western Office

Re: Balboa Park Plaza de Panama Project (Project No. 233958/SCH No. 2011031074)

Dear Ms. Shearer-Nguyen

Please accept the following comments on the Balboa Park Plaza de Panama Project (Project) Draft Environmental Impact Report (Draft EIR) dated January 23, 2012 on behalf of the National Trust for Historic Preservation. This Project has the potential to result in significant environmental impacts to historic architectural and landscape features of the Plaza de Panama Balboa Park National Historic Landmark District, a remarkably intact historic place important for its connection to both the 1915 Panama-California Exposition and 1935 California Pacific International Exposition. At the time of its original construction, Balboa Park created an architectural movement that spread across the nation and today contains some of the finest Spanish Colonial Revival architecture in the Nation.

Interests of the National Trust

The National Trust for Historic Preservation is a non-profit membership organization bringing people together to protect, enhance and enjoy the places that matter to them. Chartered by Congress in 1949, the National Trust for Historic Preservation provides leadership, education, advocacy and resources to a national network of people, organizations and local communities committed to save America's diverse historic places and revitalize communities.

The Significance of Balboa Park

As a National Historic Landmark (NHL), Balboa Park has been found to have exceptional value or quality in illustrating or interpreting the heritage of the United States." 36 C.F.R. § 65.4. Further, the site has been found to possess a "high degree" of historic integrity - the ability to convey of its historical associations or attributes. *Id.* This standard is a unique attribute NHLs meaning that Balboa Park has had very minimal alteration from the end of its period of significance to the present. While designation as a Landmark does not create any substantive legal obligations on property owners, National Historic Landmark owners are wise to observe important preservation precepts to steward these sites for the benefit of all Americans.

Congress requires of federal agencies that steward NHLs, for instance, to minimize harm “to the maximum extent possible.” 16 U.S.C. § 470h-2(f).

While we support the project objective to eliminate parking and reduce vehicular impacts from the Plaza de Panama and adjacent promenades, we feel that such a goal can be accomplished without so drastically compromising the historic integrity of the National Historic Landmark District. Specifically, we are concerned about proposed impacts to the Cabrillo Bridge, its setting, the spatial relationships and design elements which define the National Historic Landmark District.

The Cabrillo Bridge was designed as the ceremonial entrance to the 1915 Exposition, and remains the primary entry to the Park. The bridge and its surrounding area, including the California Quadrangle, form a truly remarkable ensemble, containing the most important character-defining elements of the district with a setting nearly unaltered since 1935. Unnecessary alterations to this area should be strictly avoided and feasible alternatives seriously considered.

The proposed project would alter this highly significant site in a way that would compromise its historic integrity. Among the changes are:

- Demolition of 82 feet of the Cabrillo Bridge
- Encasing and hiding from view major character defining features of the front entrance of the Spanish fortified hilltop town.
- Construction of an incompatible new bridge element that would be attached to the iconic and historic Cabrillo Bridge.
- Insertion of new buildings, retaining walls, plant materials, and other landscape features, alteration of historic landforms, and removal of historic landscape and hardscapes elements.
- Alternation of the Alcazar Garden parking lot by changing the landscape, re-grading the land form and altering the garden’s relationship to its setting.
- Introduction of a new two-lane roadway that bisects the historic core into two spaces.
- Construction of a new underground parking lot abutting the historic Speckles Organ Pavilion that irreversibly changes the relationship of the organ pavilion to the landscape and severely diminishes its prominent setting.

Under the California Environmental Quality Act, the City has an obligation to adopt feasible alternatives that would avoid these very substantial impacts to such an important historic property.

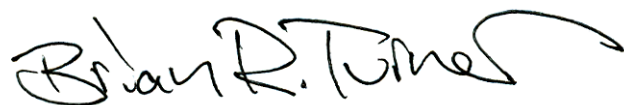
The Basis for Rejection of Alternative 4biii in the Draft EIR is inadequate

We are alarmed that the Draft EIR provides very little support for rejecting Alternative 4biii (Modified Precise Plan without Parking Structure), which would accomplish a majority of the project objectives yet cause substantially less damage to Balboa Park. This alternative proposes to two-way vehicular traffic along El Prado to the southwest corner of the Plaza de Panama, and offer a passenger drop-off site adjacent to the Plaza. The Plaza would be pedestrianized, consistent with a fundamental objective of the project, and there would be no net loss in the amount of parking. We believe this alternative is most beneficial because it avoids impacts to historic resources while offering the added benefit of promoting alternate forms of transportation such as bicycling, public transit and walking.

In rejecting this alternative, the Draft EIR simply states that routing cars in the manner proposed “would have greater traffic impacts” without offering any supporting evidence. (9-224). This basis for rejection without adequate study is clearly insufficient in light of CEQA requirements that a finding that an alternative is infeasible must describe specific reasons for its rejection. Guideline 6 15091(c). *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336. More thorough consideration must be paid to this alternative which we believe is far beneficial from a public policy perspective than the proposed action.

In sum, we believe that Balboa Park can, and should, be pedestrianized, but this goal can be accomplished at a far less cost to hits highly unique historic resources than the proposed project. Please do not hesitate to contact me at (415) 947-0692 or brian_turner@nthp.org with any questions or concerns.

Sincerely,



Brian R. Turner
Senior Field Officer/Attorney

cc: M. Wayne Donaldson, State Historic Preservation Officer
Cindy Heitzman, Executive Director, California Preservation Foundation
Bruce D. Coons, Executive Director, Save Our Heritage Organisation
Elaine Jackson Retondo, National Historic Landmarks Program Manager,
National Park Service Pacific West Region