



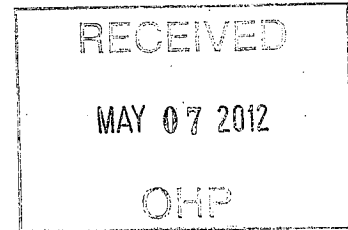
United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

H32 (2280)



Mr. Kevin Faulconer
Council President Pro Tem
City Administration Building
202 C Street
San Diego, California 92101

MAY - 2 2012

Dear Mr. Faulconer:

The National Park Service (NPS) is delegated monitoring and technical assistance responsibilities by Congress to ensure that National Historic Landmarks (NHL) retain the highest level of integrity. Our responsibilities include review and formal comment on individual proposed actions within NHL, as well as the cumulative effect of changes through time on NHL properties. It is in this capacity, and at the request of the California State Historic Preservation Officer, that we are writing to offer our assessment and comments on the proposed Balboa Park Plaza de Panama Project proposed within the Balboa Park National Historic Landmark. Our evaluation is based on information provided in the City of San Diego's compliance documents and reports, as well as a site visit conducted by NPS National Historic Landmark Program staff, Pacific West Regional Office, in San Francisco.

It is our understanding that the major components of the proposed project include construction of an elevated curved bypass bridge that would intersect Cabrillo Bridge just west of the entry point into the Plaza de California and across from the Administration Building, construction of a partially subterranean 790-space, multi-level parking structure that would be located southwest of the Spreckles Organ Pavilion, alterations to existing vehicular pathways, and rehabilitation of the Plaza de Panama.

The NPS finds that the Project will have a permanent, major and adverse effect on the integrity of the Balboa Park National Historic Landmark. The Project is not consistent with the Secretary of the Interior *Standards for the Treatment of Historic Properties (Standards)* and applicable guidelines. The Project will physically destroy a part of the NHL property, and the Project will introduce visual elements and spatial changes that will diminish the integrity of the property's historic features. In addition to the above concerns, we believe that some elements of the proposed rehabilitation have the potential to create a false sense of history.

The NPS recommends and believes that a less aggressive, more balanced approach can be achieved, which would also successfully fulfill the overarching goal of ameliorating pedestrian and vehicular conflicts, while ensuring the highest level of the property's historic integrity is retained. The remainder of our comments will further elaborate some specifics of our evaluation.

Balboa Park was designated a National Historic Landmark on December 22, 1977, for the planning, architecture, and landscape architecture that were initially created for the 1915 Panama California International Exposition, and were later revitalized for the 1935 California-Pacific International Exposition.

The NHL documentation for Balboa Park NHL characterizes the property as "... the cultural center of San Diego as well as being a beautifully designed urban area – one of the best planned and landscaped in America. The buildings are some of the finest Spanish Baroque revival architecture extant." (1977, Statement of Significance, Balboa Park NHL document.)

The lands that were developed to support the expositions were part of a larger 1,400 acre area of city-owned, undeveloped lands that were set aside for a park. The development of a master plan for what was then known as "City Park" commenced in 1902. The plan was finalized in 1905. However, it was the desire of the city's Chamber of Commerce to host an exposition commemorating completion of the Panama Canal that set in motion the planning, design, construction and the renaming of the park, which is reflected in the Balboa Park NHL.

While the decision to locate the exposition on the top of the Central Mesa portion of the Park was not met with enthusiasm by all, the *Historic Resources Technical Report* prepared by Ver Planck Historic Preservation Consulting for the Project illustrates how the topography of the site greatly informed the overall spatial design of the complex, in particular the formal entry point across Cabrillo Bridge and the overall form of the California Quadrangle.

The Technical Report states that while the lead architect for the exposition initially was opposed to the final location, the architect "... grew to appreciate that the mesa's great height in relation to Cabrillo Canyon would allow for dramatic architectural effects, especially if the grounds were accessed from the west by a bridge over Cabrillo Canyon." (Technical Report, 39) The Technical Report also states that the architect, who was "clearly taking advantage of the canyon side site, allowed the form of the California Quadrangle to cascade down the slopes of the canyon as a series of geometric forms." (Technical Report, 41) Several historic photos included in the documentation for the Project nicely illustrate the character-defining building mass and linear access via the Cabrillo Bridge. The Report goes on to say, "Probably because of this architectural drama, the view from the West Mesa, looking northeast and uphill toward the California Quadrangle, became the most important view of the Panama-California Exposition. This 'iconic view' was reproduced on hundreds of postcards, publicity materials, and all sorts of souvenirs." (Technical Report, 132)

The Cabrillo Bridge stretches across the canyon and creates a singular axial approach and processional path of entry into the complex. The Technical Report defines the major axis or spine of the District as El Prado. The Cabrillo Bridge is a significant important formal part of this axis in the overall design of the property. It provides the dramatic approach that is relieved through passage into the Plaza de California. The author of the NHL nomination for Balboa Park opens the descriptive narrative for the property with a description of this character, further defining the formal entry sequence:

“The entrance was approached across a long bridge across a canyon up to what appears to be a fortified European town – the California and Fine Arts building dominate the view. Inside the grounds the exposition was laid out along the major axis of El Prado with the minor axis of the Plaza de Panama intersecting it. The California Quadrangle provided a primary open space at the entry, and small courts and vistas into courtyards with reflecting pools, which break the force of the main axis.”

The Proposed Centennial Bridge destroys this procession by introducing a major relief point along the pathway before entrance into the California Quadrangle and by diverting the path of entry via the proposed bridge bypass. The newly proposed bridge also would introduce an incompatible visual intrusion into the setting of the NHL that would forever destroy the historic “iconic view” mentioned in the Technical Report. As the Technical Report points out, currently this historic view is obscured by vegetation in the canyon. The NPS believes that this and perhaps other historic views could be restored through a well-informed and well-executed vegetation management plan.

The vehicular access/pathway that would be established by the proposed bridge bypass continues through the historic district providing access to the proposed parking structure, and will result in changes to the circulation pattern between the Plaza de Panama area and Palisades. These changes add to the cumulative impact of the Project on the NHL District.

The proposed rehabilitation of the Plaza de Panama includes the construction of two shallow reflecting pools. The Technical Report notes that these structures would resemble similar features installed for the 1935 California Pacific Exposition. As stated, this suggests that the pools would be conjectural and not reconstructions of the 1935 pools, which could create a false sense of history and would be inconsistent with the *Secretary of the Interior Standards*. Is there enough documentary information to reconstruct one or both pools if there is a desire to re-establish this/these feature (s)?

Six objectives for the Project are listed in the Environmental Impact Report (EIR); however, all of these goals fall under two broader goals - to eliminate vehicle traffic in the core of the NHL, and to construct a Centennial Bridge and Road - and one overarching goal to “rehabilitate Plaza de Panama consistent with the original vision of a ceremonial plaza and gathering space.”

One important objective missing from the list is ensuring that the historic integrity of Balboa Park NHL is retained. The NPS believes that there are viable, less costly alternatives that would reduce or eliminate private vehicular traffic from the core without the significant impacts to the integrity of the NHL that would result from the Project. The NPS also questions whether complete removal of vehicular traffic is realistic and whether removal of all traffic is even in keeping with historic patterns of use.

Historic photographs taken during the time of the two expositions that were included in the Technical Report and the Centennial Bridge Photographic Survey show that while most visitors within the historic core were on foot, some traveled about in small 2-person carts at least along the El Prado and Cabrillo Bridge. Cabrillo Bridge was clearly constructed as a roadway with

Historic photographs taken during the time of the two expositions that were included in the Technical Report and the Centennial Bridge Photographic Survey show that while most visitors within the historic core were on foot, some traveled about in small two-person carts at least along the El Prado and Cabrillo Bridge. Cabrillo Bridge was clearly constructed as a roadway with curbs and formal sidewalks. Other historic views show numerous cars parked and driving on the Plaza de California as early as 1923. The Technical Report states, "Automobiles also were fully introduced to Balboa Park, appearing in early photographs parked on Plaza de Panama, Plaza de California and all along El Prado." (Technical Report, page 61) Private autos appear to have been excluded from the exhibition grounds during the 1935 Exhibition, much like the current practice at Balboa Park for special events such as "December Nights."

The Project seeks to remove vehicles from within the historic core in an attempt to recreate a primarily pedestrian circulation pattern as was done during the expositions. However, the original use was inherently short-term, and today the property no longer functions as the site of a world's fair. The current use as a cultural center and urban park is quite compatible, and the City of San Diego can continue to support this use and improve pedestrian circulation without significantly impacting the historic integrity of the buildings, circulation, landscape, and setting that qualify the property as a NHL. We recommend that the city reconsider its current plans and explore viable solutions that better protect the historic integrity of this unique resource.

Sincerely,



Stephanie Toothman, Ph.D.
Associate Director, Cultural Resources

cc: Milford Wayne Donaldson, California State Historic Preservation Officer
Catherine Winterrowd, Principal Planner, City of San Diego
E. Shearer-Nguyen, Environmental Planner, City of San Diego
Michael Kelly, President, The Committee of One Hundred Dedicated to the Preservation of Spanish Colonial Architecture in Balboa Park