

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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March 22, 2012

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Balboa Park Plaza de Panama Project Draft Environmental Impact Report (DEIR) #
2011031074

Dear Ms. Shearer-Nguyen:

The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. We thank you for the opportunity to comment on the above Draft Environmental Impact Report (DEIR) issued under the California Environmental Quality Act (CEQA). We want to thank Ms. Cathy Winterrowd, CLG Liaison/City Planner, for providing on-site visits to Balboa Park for my staff and for the National Park Service.

As preface to my formal comments under CEQA for this project, I want to reiterate that the OHP, absent any existing regulatory role, neither reviews nor comments on any issues or criteria while a local jurisdiction, agency or entity is in the process of developing a project. Please refer to my February 11, 2011 letter.

The City of San Diego has prepared a project level DEIR for the Balboa Park Plaza de Panama Project (Project) with the following project components: elimination of automobile traffic from the Plaza de Panama and parking from the Plaza; construction of a new bridge and a by-pass road originating at the east end of the Cabrillo Bridge to reroute traffic and allow for pedestrian uses of El Prado and the Plaza de California; redesign of the Alcazar parking lot for parking, passenger drop-off, valet parking, and construction of a new, three level parking structure with 798 parking spaces with a roof-top park/garden of 2.2 acres at the Organ Pavilion surface parking lot.

The Project's objectives are: restoration of pedestrian and park uses to the Central Mesa; alleviating vehicle and pedestrian conflicts by removing vehicles from the Plaza de Panama, El Prado, Plaza de California and the Pan American Road East while maintaining public access to the park's institutions; improving the pedestrian link between the Palisades and El Prado; recreation of the California Garden behind the Organ Pavilion; expansion of access to the Central Mesa with a new tram system while maintaining convenient valet parking and access for persons with disabilities; completion of all the work proposed in the DEIR before January 2015; and

implementation of a funding plan for a self-sustaining paid parking structure and future planned tram operations.

The Project examined in the DEIR would require amending the existing Balboa Park Master Plan (BPMP), the Central Mesa Precise Plan (CMPP), in addition to a Site Development Permit (SDP) to allow for deviations from the City's Environmental Sensitive Lands (ESL) and the Historic Resources Regulations.

Although the CMPP is more than 20 years old, its goal is to preserve the historical significance of the 1915 and 1935 Expositions sites while meeting the functional needs for the necessary administration of this one-of-a-kind regional park which derives its exceptional character from the very unique physical environment of the Central Mesa characterized by its historical, cultural and natural treasures. It is important to remember that the purpose of the CMPP is to preserve the historic features that originate from both Expositions and that form the National Historic Landmark District (NHLD). "The goal of this portion of the plan is to rehabilitate and modify the physical environment of the Central Mesa in a manner which preserves its historic significance and provides for future uses." (CMPP, p. 3)

For this purpose, the CMPP has developed detailed and specific design guidelines. These guidelines provide not just that "the individual structures/buildings should be preserved but the entire ensemble in its original composition should be preserved and restored... It is the historic relationship between the built and outdoor environment that is the hallmark of the two Expositions. Because each structure affects its site context to such a great degree, it is vital to the preservation of the historic district that every effort be made to preserve and restore original Exposition building footprints and elevations wherever possible. For this reason, emphasis has been placed on minimizing architectural additions unless they are reconstructions of significant historical features." (CMPP, p. 205)

And because preserving the spatial relationships of the NHLD is of paramount importance, very specific recommendations for reconstructions, additions to existing structures, and new structures were developed and adopted, requiring that all architectural improvements on structures listed on the National Register of Historic Places must strictly adhere to the Secretary of the Interior's Standards for the Treatment of Historic Properties, and that all design proposals for new structures should closely adhere to the established historic design themes. (CMPP, p.211)

Balboa Park is now struggling to balance both the preservation of cultural use and an open public park environment, by providing for a pedestrian-oriented park use and experience, while at the same time preserving the tremendous historical significance of the NHLD and finding solutions to functional needs, in an urban environment dominated by the automobile. The DEIR and its many alternatives has looked beyond some of the concepts and policies of the 20-year-old CMPP offering several good ideas, particularly relating to reduced traffic in or through the park. Some of these good suggestions

should receive additional scrutiny and find their way into the public discourse for further exploration.

Historical Resources

Pursuant to CEQA Guidelines §15126.2(a) an EIR is required to assess the environmental effects of the Project on the environment and shall clearly identify and describe direct and indirect significant impacts.

Public Resources Code §21084.1 states it is required that a lead agency determine whether a project may impact a historical resource as defined by CEQA, and whether any such impact will cause a substantial adverse change in the significance of a historical resource (CEQA Guidelines §15064.5 (a)(b))(2)) and what constitutes a substantial adverse change in the significance of a historical resource or its immediate surrounding; i.e., demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register of Historical Resources. As such, a fundamental task of any EIR is to determine: a) whether there is a historical resources present, b) whether the historical resources is significant, and c) whether the proposed project would cause a substantial adverse change to the physical characteristics that convey said resources' historical significance and justify its eligibility for, or inclusion in, the California Register.

For purposes of CEQA, the DEIR should consider the following historic resources: The Balboa Park District, the National Historic Landmark District (NHLD); the El Prado National Historic Register District; and the Cabrillo Freeway Historic District, which was determined eligible for the National Register in 1996 with the Cabrillo Bridge and nine roadway and landscape contributors. Per the currently available information from the database of the National Register of Historical Places managed by the National Park Service, the Balboa Park NHLD consists of the following contributors: ten buildings and five structures. The El Prado Complex, the National Register District, consists of 13 contributing buildings, one structure and two non-historic contributors.

As the Court of Appeal stated in the *Santiago Water District v. County of Orange* case, an EIR needs to include sufficient analysis to determine how adverse the impact will be. (*Santiago Water District v. County of Orange* (1981) 118 Cal. App.3d 818, 831) CEQA Guidelines §15150 requires a sufficient degree of analysis to enable decision makers "to make a decision which intelligently takes account of environmental consequences.

The ability to make a decision on the environmental consequences of the Project must be based on a sufficient degree of analysis. The following quote from the Environmental Analysis section 4.2 of the DEIR, as a case in point, states: "According to the Historical Resources Report, although there is no definitive list of contributors and non-contributors for either the National Register or the National Historic Landmark districts, it is apparent that all buildings and structures, landscapes, and objectives constructed for

the 1915 Panama-California Exposition and the 1935 California Pacific International Exposition that retain integrity should be considered contributors to the NHLD. Based on these criteria, the area within the vicinity of the proposed Centennial Road is not considered a district contributor. The area in which the Centennial Road would be constructed does not contain any historical structures. . . . although the construction of the Centennial road would alter the existing circulation network, it would not impact contributing features of the historic district. . . . As such the landform alteration and retaining walls associated with the Centennial Road would not be consistent with SOI Rehabilitation Standards 2 and 9, the adverse effect would not be considered significant . . . since it would not demolish, destroy, relocate or alter the NHLD such that it would be materially impaired. Thus the impact of the Centennial Road would be less than significant.” (p. 25-26)

The DEIR should specify what criteria were used to determine that the area in the vicinity of the proposed Centennial Road is not a contributor, and the DEIR should make clear which buildings and structures within the boundaries of the NHLD are non-contributors. Moreover, the Standards, as in this DEIR, can also not be used to analyze potential impacts of the Project on the environment; they were not designed for this purpose. Instead, the Standards provide guidance for selecting treatments to historic properties, mostly to buildings.

Because this Project is planned in a National Historic Landmark District, a National Register District, and in the Cabrillo Historic Freeway District, the DEIR should include a discussion of whether this Project - as a whole - would result in any potential direct and indirect impacts to the integrity of each district. This analysis should include a discussion of whether the Project would result in an impact on the historical designations. Please note that we are not concluding that the Project would or would not result in an impact on the designation. We do believe, however, that this public concern should be explicitly addressed in the final environmental impact report.

Mitigation Measures

An EIR must describe feasible measures to reduce significant adverse impacts (CEQA Guidelines §15126.4(a)(1)). The DEIR concluded that the Project would cause significant adverse unmitigable impacts to historic resources. CEQA requires the identification of feasible measures to mitigate significant adverse changes in the significance of a historical resource. (CEQA Guidelines §15064.5(4)) And pursuant to CEQA Guidelines § 15126.4 (b)(2) mitigation measures may include historical resource documentation, photographs, and architectural drawings. The EIR should consider development of such mitigation measures where significant unavoidable impacts are identified.

In closing, I wish to express my agreement with the conclusion in the DEIR that the introduction of the Centennial Bridge into the NHLD and the El Prado Historic District causes a substantial adverse change in the significance of these historical resources

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because this construction element was never part of the original design for the Expositions. The original plans for the Expositions followed a design plan defined by the formal dignity of great cities characterized by an axial symmetry with grand focal points. As such, the curving design of the bridge is opposing the straight and axial design that characterizes the approaches, plazas, arcades, and roads of Balboa Park. The approach across Cabrillo Bridge represents the primary historic view landscape and is, in fact, one of the most sensitive areas of the entire Park because it is Bertram Goodhue's city in miniature - city on the hill design.

Thank you again for the opportunity to comment on this DEIR.

Please don't hesitate to contact me if you have any questions either at (916) 445-7043 or at mwdonaldson@parks.ca.gov.

Sincerely,



Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

CC: Cathy Winterrowd, Senior Planner/CLG Liaison, City of San Diego
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