

H E R I T A G E
ARCHITECTURE & PLANNING



May 14, 2012

RECON Environmental, Inc.
1927 Fifth Avenue
San Diego, CA 92101

Attention: Ms. Bobbi Herdes, Principal

Subject: Balboa Park - Plaza de Panama
National Park Service Letter

HAP #10031

Dear Bobbi:

I know that you have seen the letter from Stephanie Toothman from the Washington D.C. office of the National Park Service (NPS) regarding the Plaza de Panama Project dated May 2, 2012. As the Preservation Consultant for the project, I wanted to address the issues that Ms. Toothman has raised. Items shown in quotes are taken directly from the NPS letter unless noted otherwise.

As you know, the National Park Service has no formal review or approval authority for the project since no federal funds are being used. As the Certified Local Government representative, the City of San Diego's Historical Resources Board (HRB), is responsible for reviewing proposed projects in Balboa Park. The NPS has never contacted my office or other members of the project team to discuss the Plaza de Panama Project. It is also odd that this letter missed the deadline for the 60-day review period for the Environmental Impact Report (EIR) by several weeks.

Ms. Toothman's letter raises some important concerns, but the only new issue is her contention that the proposed Plaza de Panama reflecting pools "could create a false sense of history" since they are not true reconstructions of the 1935 pools. Rehabilitation Standard 3 states, in part: "Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken." In addition, Rehabilitation Standard 9 states, in part: "New additions, exterior alterations, or related new construction shall... be differentiated from the old and shall be compatible... to protect the historic integrity of the property and its environment." This issue is easily addressed because the proposed reflecting pools are clearly contemporary and differentiated in style and detailing. The use of a 1/2-deep sheet of water at ground level without any visible pipes or drains is a contemporary approach to public water features. A comparison of the renderings and design drawings with historic photographs clearly shows that no "false sense of historical development" will be created.

Ms. Toothman's primary concern is over the visual and spatial impact of the Centennial Bridge on the "formal entry" to the former exposition grounds. As you know, this issue was addressed in great detail in Christopher VerPlanck's Historic Resources Technical Report and the EIR authored by Recon.



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There is broad consensus that the Centennial Bridge would indeed have a visual and spatial impact at the west side of the historic district. The Centennial Bridge has been refined and redesigned based on input received at design workshops with the public, committees, and stakeholders -- including project opponents. The latest design is as slender and transparent as possible to reduce its visual impact.

The technical appendices to the EIR and historic photographs clearly show that the formal entry has been obscured by historic trees since the 1920s. Ms. Toothman agrees, stating that “currently this historic view is obscured by vegetation.” The Centennial Bridge issue is something that the project team and city have been aware of for over a year, and it is the reason the project is requiring a Site Development Permit and conditions for approval like other projects that don’t fully comply with The Secretary of the Interior’s Standards.

The letter lists one of the project objectives “to construct a Centennial Bridge and Road.” This is an incorrect statement. The numerous objectives of the Plaza de Panama project do not include constructing a bridge or realigning a road. The six primary goals/objectives, as stated in the EIR are:

1. Remove vehicles from the Plaza de Panama, El Prado, Plaza de California, the Mall (also called “the Esplanade”), and Pan American Road East while maintaining public and proximate vehicular access to the institutions which are vital to the park’s success and longevity.
2. Restore pedestrian and park uses to El Prado, Plaza de Panama, Plaza de California, the Mall, and re-create the California Garden behind the Organ Pavilion.
3. Improve access to the Central Mesa through the provision of additional parking, while maintaining convenient drop-off, disabled access, valet parking, and a new tram system with the potential for future expansion.
4. Improve the pedestrian link between the Central Mesa’s two cultural cores: El Prado and the Palisades.
5. Implement a funding plan including bonds that provides for construction of a self-sustaining paid parking structure intended to fund the structure’s operation and maintenance, the planned tram operations, and the debt service on the structure only.
6. Complete all work prior to January 2015 for the 1915 Panama-California Exposition centennial celebration.

Another issue that was raised by Ms. Toothman was that the realigned Centennial Road “would result in changes to the circulation pattern between the Plaza de Panama area and the Palisades.” As noted above, one of the project objectives is to “Improve the pedestrian link between the Central Mesa’s two cultural cores: El Prado and the Palisades.” The landforms impacted by Centennial Road were all previously disturbed by the current road and by grading, structures, and landscaping that were constructed after 1935 and do not reflect what existed there historically. This area has been deemed as a non-contributing to the historic district because of these previous alterations.



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The new road alignment is almost identical to what was approved in the Central Mesa Precise Plan (CMPP), including new retaining walls. The only changes actually create a wider and more attractive pedestrian and landscaped connection than what the CMPP showed. The purpose of this wider connection is to provide an improved path for pedestrians and to enhance the relationship of the Organ Pavilion to its surroundings on the south. The project provides a 150-foot wide area that will be adjacent to and level with the Organ Pavilion. Today this route is dominated by vehicles with pedestrians relegated to sidewalks. The design team feels strongly that these “changes to the circulation pattern” are a benefit to park users and are faithful to the historic use.

Despite statements by the project’s opponents, Ms. Toothman never states in her letter that the completed project would or should result in the loss of the Balboa Park’s National Historic Landmark status. Given that Balboa Park retains 11 original buildings (and reconstructions) and numerous gardens dating to the 1915 Panama-California Exposition, it would be difficult to show that removal of 67 feet of Cabrillo Bridge railing, a partially visible Centennial Bridge, and items previously approved in the Central Mesa Precise Plan will threaten the park’s National Historic Landmark status.

As stated by Historical Resources Board Principal Planner Cathy Winterrowd: “Removing a listed resource from the [National] Register is a very significant step and merely implementing a project that is not consistent with the Secretary of the Interior’s Standards is not sufficient grounds to warrant its removal. [I do not] believe that implementation of the bypass bridge would result in the property ceasing to meet the criteria for listing in the National Register. The qualities which caused it to be originally listed would not have been lost or destroyed as a result of the project.”

Interestingly, Ms. Toothman did not indicate support for any alternative to the Plaza de Panama project, even though 13 alternatives were evaluated in the EIR. She did question, however, “whether removal of traffic is even in keeping with historic patterns of use.” She elaborated by stating that since “the property no longer functions as the site of a world’s fair... [the project’s] attempt to recreate a primarily pedestrian circulation pattern as was done during the expositions” may not be appropriate.

I find it curious that Ms. Toothman is essentially advocating for leaving cars driving through the core of Balboa Park. This scenario was studied in great detail as part of several alternatives in the EIR and was shown to have significant long-term unmitigable impacts.



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Ms. Toothman may not be aware that even though they were huge events at the time, the total attendance for both expositions was 10.5 million over four years. Present-day attendance in Balboa Park is estimated to be 12-15 million in one year. We know for a fact that there are more cars driving through the core of the park and plazas than there were during the times between and after the two expos. The contention that only expositions justify removing cars from the core of Balboa Park is a fallacy. Even the vast majority of those who oppose the Plaza de Panama project agree that removing cars from the core of the park is an important goal.

There is an open invitation to the National Park Service to meet with the project team and Historical Resources Board staff to review the plans of the project in detail if they so desire. Thank you.

Sincerely,

David Marshall, AIA, NCARB
C24785

cc. Gordon Kovtun, KCM Group
Cathy Winterrowd, City of San Diego HRB Staff

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