



**Plaza de Panama Project**  
**Evaluation of the SHPO Email**

**MEMO**

The issues raised in the email dated February 3, 2012 from State Historic Preservation Officer (SHPO) Milford Wayne Donaldson, FAIA have been grouped in categories that I feel are appropriate. It is clear that the email was intended to be preliminary, and does not include sufficient detail to address every comment. Items shown in quotes are taken directly from the SHPO's email unless noted otherwise.

There was clearly some information about the proposed Plaza de Panama project that was either misinterpreted, unknown, or misunderstood. To date, the Office of Historic Preservation has not contacted the City of San Diego's Historical Resources Board or the design team to discuss the project or their concerns.

**Broad or Exaggerated Statements**

"The proposed plan renders the site unable to convey its original design intent." The original design intent is well documented in the technical appendices to the EIR and is much more complex than implied by this unsubstantiated statement. 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 new bridge, and items previously approved in the Central Mesa Precise Plan (CMPP) will render "the site unable to convey its original design intent." In reality, none of the items listed above are visible from El Prado once a visitor passes through the west archway.

"Encasing and hiding from view the major character defining features of the front entrance..." There is agreement that the Centennial Bridge would have a visual and spatial impact on the west entrance as one approaches the historic core. This impact has been reduced as much as possible by designing the bridge to be as slender and transparent as possible while still removing cars from El Prado. The southwest corner of the California Building is still visible above and behind the Centennial Bridge, which is spaced 53 feet away from the corner of the building. Mature landscaping, mostly consisting of 1915-era Eucalyptus trees, reduces the visual impact even more. Words like "encasing" and "hiding" are exaggerated, inaccurate and incorrectly imply that the original design intent was for this composition to be exposed without trees. The technical appendices to the EIR and historic photographs clearly show that the "character defining features of the front entrance" were already well obscured by the historic tree planting before the close of the exposition in 1916.



“The... 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.” This is a misleading statement that does not state the true goals of the project. The numerous objectives of the Plaza de Panama project go beyond merely eliminating parking in the Plaza de Panama. 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.

### **Basic Inaccuracies**

“Demolition of 82 feet of the Cabrillo Bridge...” This appears to be an unintended error by the SHPO as he is likely aware that only a section of the Cabrillo Bridge railing is proposed to be removed, not an actual section of the bridge. The true dimension of railing removal is 67 feet at the far eastern end of the bridge abutment, aligning with the missing railing across the road in front of the Administration Building. Given that the bridge has 3,000 feet of identical railing, the removed portion equates to two percent. The adjacent historic stairs and light fixtures will remain in place.

The project in no way alters “the [Alcazar] garden’s relationship to its setting.” The existing non-historic parking lot will remain as a parking lot and vehicles would be further away from Alcazar Garden than they are today. The project removes a non-contributing maintenance structure and restroom near the garden.

“...adding multiple uses [to the Alcazar parking lot]” Only one new use is proposed for the Alcazar parking lot, which is a non-contributor to the historic district, and that is valet staging. There is currently disabled parking, drop-off, dumpster storage, and a restroom all of which are included under the new plan. The only changes are converting the existing parking circulation lanes into new through lanes which are crossed by raised pedestrian walks to calm traffic and noise.



“[Centennial Road alters] the historic space and land forms irreversibly.” The landforms impacted by Centennial Road were all previously disturbed by the current road and by non-contributing topography, 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.

“[Centennial Road] fills significant parts of Palm Canyon...” This topic is well analyzed in the EIR, which finds that the impacts of earthwork near Palm Canyon are less than significant. The existing footprint and slopes of Palm Canyon are only impacted at the north end where the current dipping road would be raised to meet roadway slope requirements. Several young palms would be relocated away from the eastern rim of the canyon and a new raised boardwalk would replace the current concrete sidewalk. There would be no “filling-in” of Palm Canyon. In addition, the project would remove the 1990s restroom building that currently encroaches into Palm Canyon.

“...underground parking lot that abuts directly against the historic Speckles [sic] Organ Pavilion.” This is clearly not true, unless one considers 85 feet away from the Organ Pavilion “directly abutting.”

### **Previously Approved in the Precise Plan**

The Central Mesa Precise Plan (CMPP) was approved and adopted by the City of San Diego in 1992. The SHPO letter expressed concerns over elements of the Plaza de Panama project that are fully consistent with the approved CMPP:

“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...” There is currently a “two-lane roadway road that bisects the historic core into two spaces.” It is called Pan American Road. The proposed Centennial Road replaces Pan American Road with a new alignment that moves vehicles away from the primary link between El Prado and the Palisades. In addition, this new road alignment is almost exactly what was approved in the Central Mesa Precise Plan, 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. This area was the California Gardens in 1935 but was removed and lowered to become a steep slope as part of the construction of the Organ Pavilion parking area sometime after 1950. The project provides a 150-foot wide area that will be adjacent to and level with the Organ Pavilion which allows for the recreation of the California Gardens. This improvement restores the spatial relationship of the Organ Pavilion and its surroundings and will further make the handsome south façade of the pavilion visible as it was in 1915 and 1935.

“This is achieved by excavating a very large ravine containing the road...” The realigned Centennial Road incorporates the same grade changes, depressed roadway, and retaining wall concepts that



were approved in the CMPP. This road alignment is proposed to make it possible to have a car-free, broad pedestrian connection between the Plaza de Panama, Esplanade and Palisades area. Today this route is dominated by vehicles with pedestrians relegated to sidewalks. The project proposes a promenade that will unify and connect the House of Pacific Relations buildings and landscape setting with the park space on top of the proposed garage with free and open park land.

“The... 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...” The new underground parking structure and road alignment, in the same locations, are approved as part of the Central Mesa Precise Plan. The proposed parking structure is a comfortable 800 spaces, whereas the approved structure in the CMPP was 1,000 to 1,500 spaces. Investigation into the impact of providing the full 1,000-1,500 spaces found that it is not possible to create a structure of that scale in this location without introducing mechanical ventilation systems that are not sustainable and likely would have significant noise impacts to the Organ Pavilion. A nominal parking fee is needed to pay back the bond financing as well as cover maintenance and operations of the parking structure and provide for the free tram.

### **Previously Resolved with Historical Resources Board Staff**

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 Plaza de Panama team has been working productively with the HRB staff for over a year to address their concerns, provide detailed feedback, and refine the design. The items listed below have previously been resolved through HRB staff:

“[The new parking structure] irreversibly changes the relationship of the organ pavilion to the landscape and severely diminishes its prominent setting.” Not only has a parking structure been previously approved in the CMPP for this exact location and elevation, but the landforms and landscaping in the current parking lot are not as they were in 1915 (or 1935) and the area is currently a non-contributor to the historic district. As can be seen in historic photographs, “the relationship of the organ pavilion to the landscape...” was altered in the 1950s when the existing parking lot was excavated and paved. The proposed project actually brings back the historic elevation by introducing a new park space above the parking structure. In addition, the project proposes to incorporate a new flower garden behind the Organ Pavilion to recall the 1935 “California Gardens” in that location.

“Insertion of new buildings, retaining walls, changed historic landforms, removal of historic plant materials, removal of the historic hardscapes and curbs.” The new buildings were designed using references to historic expo structures and comply with the Rehabilitation Standards. Former Balboa Park arborist Kathy Puplava is a consultant to the design team. Ms. Puplava only identified four trees in the project area as historically significant along with several “San Diego Red” bougainvillea plants. All of these plantings are scheduled to remain. There may be other trees and plants within the project area that date to the 1915 period, but the City has no survey identifying them. In



addition, the drawings specifically call-out to remove only non-historic planting within the historic core and replacing it with historically appropriate species. No historic hardscapes or paving are being removed. The project would remove only non-historic asphalt, concrete, and interlocking pavers and replace them with appropriate new paving to be reviewed and approved by the HRB. The existing west El Prado curb is in poor condition and is proposed to be replaced with new matching curb. “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 NHLD because the qualities, which caused it to be originally designated, may be lost or destroyed.” As stated by Historical Resources Board Principal Planner Cathy Winterrowd in her 5-6-11 letter to Mayor Sanders: “Removing a listed resource from the 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.”

### **Rehabilitation Versus Restoration**

The SHPO letter makes reference to “elements that... did not exist during the period of significance...” The Plaza de Panama project is a Rehabilitation project, rather than a Restoration project. “Rehabilitation” is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.” The National Park Service allows for “some repair or alteration... needed in order to provide for an efficient contemporary use...” Restoration is not a required treatment, although several aspects of the project restore missing 1915 features, like the decorative light standards around the plaza. The Plaza de Panama team believes that the items listed below all comply with the Rehabilitation Standards:

“The significant introduction of new plants, trees and hardscapes not present during the period of significance or available during that period.” These elements comply with the Rehabilitation Standards.

“adding... small buildings for valet use [to the Alcazar parking lot].” The small buildings at the periphery consist of a 42 square foot valet booth and a dumpster enclosure to screen what are currently exposed dumpsters. Both the valet booth and dumpster enclosure incorporate the design of a long-missing 1915 wood log pergola that was once in this location. These buildings comply with the Rehabilitation Standards.

“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.” These buildings were designed using references to historic expo structures and comply with the Rehabilitation Standards.

**HERITAGE**  
ARCHITECTURE & PLANNING**Code or ADA-Required Upgrades**

“a heavily modified Alcazar Garden parking lot... re-grading the land form...” Re-grading of the non-historic Alcazar parking lot is required to comply with the cross-slope requirement of the Americans with Disabilities Act (ADA). The upgraded Alcazar parking lot sits almost entirely within the limits of the existing footprint of the parking lot and has been found to have a less than significant impact in the Draft EIR.

The design team encourages the SHPO to meet with the HRB staff and design team to review the plans of the project in detail. I am confident that this review will inform the SHPO’s understanding and analysis of the project and the findings of the DRAFT EIR that is now out for public review.

-- David Marshall, AIA  
Preservation Consultant, February 8, 2012