

# NEIGHBORHOOD HISTORIC PRESERVATION COALITION

Advocating for measures that preserve our established neighborhoods and historic resources for future generations

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Environmental Policy & Public Spaces Division  
City of San Diego  
City Planning Department  
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Dear Kelley and Suzanne,

This letter formally requests the Historic Resources Board (HRB) to commission a study by PlaceEconomics to comprehensively analyze how historic preservation impacts San Diego's affordable housing, equity, and climate goals. We ask that the matter of allocation of funds for such a study be placed on the next HRB agenda for the board to direct staff to recommend to City Council the expenditure of this study using the Historic Preservation Fund.

On January 22, 2024, the City announced an initiative titled *Preservation and Progress: An Update to the City's Heritage Preservation Program*. The initiative states that it is intended to streamline the process for new development by updating the City's Historic Preservation Program. This overhaul is predicated on presumptions that the current historic regulations result in "uncertainty and inefficiency for property owners and the public;" unnecessarily burden projects through "added review requirements, processing times and uncertainties;" and, contribute to systemic racism and injustice.<sup>1</sup> The initiative names six goals intended to redress these real or perceived insufficiencies: advancing equity in preservation to prioritize marginalized communities, evaluating the Mills Act program, proactively identifying historic resources, reforming the permit process to encourage adaptive reuse, adopting design standards for historic properties, and removing regulations that impact non-historic properties. To meet these ends, Preservation and Progress intends to "take a comprehensive look at all of the policy and regulatory documents that guide the City's Heritage Preservation Program" and sets out a two-year timeline in which the City will develop a program update framework, allow public engagement, develop draft amendments of pertinent regulations and polices, and hold public hearings.<sup>2</sup>

Conspicuously absent from the Preservation and Progress initiative is any form of rigorous research-based and data-driven study related to the real impacts of historic preservation. Instead, this major overhaul of the preservation program appears to be driven by unsupported presumptions that the current regulations impose negative impacts on new development. The community can only speculate whether these perceived inadequacies derive from the Independent Budget Analyst Report (which suffered major analytical flaws but concluded that historic preservation did *not* slow development); the recommendations of the Middle-Income Housing Working Group, which did not involve any rigorous statistical study let alone include any input from preservationists, a key stakeholder community; or, anecdotal reports from developers, lobbyists, or others. **In short, the evidence necessary to effectively guide such a massive overhaul of the historic preservation guidelines is sorely lacking and forging ahead in the absence of such research-based data could have unpredictable effects and lead to unforeseen distortions in the marketplace.**

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<sup>1</sup> <https://www.sandiego.gov/planning/work/historic-preservation-planning/preservation-and-progress>

<sup>2</sup> <https://www.sandiego.gov/planning/work/historic-preservation-planning/preservation-and-progress>

Under SDMC 111.0206(d)(6) the HRB has a duty to “make recommendations to the City Council regarding . . . [any] interest relative to property located in the city in furtherance of the general purposes of historical preservation.” Because this overhaul will potentially affect every property within the City of San Diego in perpetuity, it is incumbent upon the members of the HRB, who have been appointed for their expertise, to make a recommendation now.

To fulfill this duty, we propose that the HRB retain PlaceEconomics, a preeminent, well-established, research firm dedicated to thorough and robust analysis of the economic impacts of historic preservation. No institution has conducted more analyses of the economic impacts of historic preservation than PlaceEconomics, and Los Angeles, San Antonio, and Phoenix have all retained this firm for similar purposes.<sup>3</sup> We encourage you to seek the feedback of your colleagues in Los Angeles.

We further recommend that PlaceEconomics perform a comprehensive analysis of at least four crucial preservation areas that are central to understanding San Diego’s housing and preservation needs. These include the following:

- **Analyze the Housing Market for Affordability:** This study would look at existing buildings and if or how they support affordability. This data could also identify the types of housing and areas within the City that contribute to housing affordability, such as bungalow courts, apartment buildings, and historic districts.
- **Environmental Impacts:** This assessment will help the city account for landfill capacity and the loss of embodied energy when buildings are demolished. Investing in existing buildings retains housing affordability and supports responses to climate change. Measuring the environmental impacts will support the City’s Climate Action and Resiliency plans and will help meet their stated goals with a variety of solutions.
- **Social Justice Measurements:** Many families link their financial security to homeownership, but some communities of color have been denied that status due to racism, redlining, and nervous banks. Measuring homeownership rates, displacement, and the burdensome cost of housing will help identify the shortfalls of San Diego’s policies and regulations, and demonstrate how historic preservation and adaptive reuse can serve these communities, especially with affordable housing.
- **Historic Districts:** Identifying patterns that exist within historic districts that are different from those in the rest of the city. Possible metrics include property value change, job and business creation, population density, demographic patterns, walkability, foreclosure rates, tree canopy coverage, landfill diversion, embodied energy calculations, and more.
- **Mills Act:** A review of the value of the Mills Act. Such a study would consider the larger economic context in which the Mills Act operates.
- **Cost-effectiveness** of preservation and adaptive reuse vs. new construction.

We believe a comprehensive study is necessary to provide evidence-based, actionable recommendations for

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<sup>3</sup> PlaceEconomics’ recent studies of San Antonio and Los Angeles are of great interest. (<https://www.placeeconomics.com/resource> on page 3)

sustainable, inclusive, and economically sound solutions. And, to the benefit of all San Diegans, this independent outside expertise will allow us all to learn from its findings and direct the amendments that ultimately come out of the Preservation and Progress initiative. Such a report takes between 3- and 6-months' time to generate, which would allow for creation of the report within the timeframe of the Preservation and Progress initiative, if the HRB approves the project immediately.

Regarding costs, the research and study project is estimated between \$50,000 and \$70,000. The good news is that the current balance of the Historic Preservation Fund is \$94,678.<sup>4</sup> We ask that the board direct staff to request City Council to allocate these funds for this use.

We understand the expense of such a report is momentous, but much more so is the proposed overhaul and the lasting impact it will have on our built history and all San Diegans.

To conclude, we know that historic preservation plays a substantial role in affordable housing, climate challenges, and social equity solutions. Yet, for whatever reason, the City has not adequately accounted for the impact of historic preservation. For example, the City of San Diego has presented plans for affordable housing (SD Housing Commission), climate issue actions, and a strategic plan. Historic preservation is missing from all these plans, which is a colossal oversight—no other big city that we are aware of has omitted historic preservation from their strategic plans. Approving this report would not only help remedy these egregious oversights but would also greatly enrich our understanding of the intricate relationship between preservation, affordable housing, social justice, and economic vitality.

We ask that you include this request and, we hope, your recommendation for the next HRB meeting.

Submitted on behalf of the Neighborhood Historic Preservation Coalition.

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<sup>4</sup> The Historic Preservation Fund was established, in part, to support historic preservation programs and monies allocated for such uses must go through City Council's budget approval process. Resolution No. R-305067 (July 7, 2009). To the best of our knowledge, the HRB has not accessed these funds since 2014.

February 2, 2024

Tim Hutter, Chair  
Historical Resources Board  
City of San Diego

Re: Talmadge Park Estates Historic District National Register Nomination

The Talmadge Historical Society would like to respond to the objections that were raised at the January 25 Historic Resources Board meeting against the nomination of the Talmadge Park Estates Historic District (TPEHD) to the National Register of Historic Places. These objections can be summarized as follows:

**1. Historic designation should not be given to any home that was constructed in an area included in the HOLC (FHA) redline map or that had exclusionary racial deed restrictions.**

The nomination report made sure to document how Talmadge reflected the history of racism in FHA lending practices. However, as was noted at the January HRB meeting and at the February 2 State Historic Resources Commission hearing, where the TPEHD was unanimously and enthusiastically approved, issues of past discrimination are outside of the criteria for the National Register of Historic Places and are accordingly not the focus of the nomination report.

**2. The historic district nomination did not follow a process that meets preservation standards.**

As was previously presented, the Talmadge Park Estates Historic District followed a rigorous survey process, including the creation of a program to document over 120 characteristics of each property. This data was used to ensure consistent evaluation of historic integrity.

Despite acting within the regulations of historic preservation, the residents of Talmadge have been attacked by special interests outside of Talmadge who view historic preservation as an impediment to deregulation of the building industry.

While public input San Diego's land use policies is welcome from all parties, we object to the effort to replace reasoned discourse with defamatory personal attacks on people who express different opinions.

Respectfully,

Laura Henson  
President, Talmadge Historical Society

Attachment: Detailed response to the letter of Wes Morgan submitted to the HRB on  
January 25, 2024.

**Detailed response to the letter of Wes Morgan submitted to the HRB on  
January 25, 2024**

The letter from Mr. Morgan is annotated below. Responses to the letter are highlighted in red.

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Tim Hutter, Chair  
Historical Resources Board  
City of San Diego  
c/o Suzanne Segur, Senior Planner, HRB Liaison  
Email: [SSegur@sandiego.gov](mailto:SSegur@sandiego.gov)

Re: Talmadge Park Estates Historic District National Register Nomination

Dear Ms. Stanco, Mr. Hutter, and Members of the Historic Resource Board:

I am asking the Historic Resource Board (HRB) to respectfully deny the staff motion to recommend to the California State Office of Historic Preservation the listing of the Talmadge Park Estates Historic District.

I am also asking the HRB to consider a countermotion stating that the board neither condones nor supports designation or further recognition of a Talmadge Park Estates Historic District for two primary reasons:

- I. Talmadge Park Estates was founded on a basis of deliberately marketed racism – and their submission does not adequately reflect a complete historical perspective of the inequities and segregation that have persisted in the area for the last 100 years. Not only will historical designation condone the racial undertones woven into the community, but it will stifle any further attempt to affirmatively further fair housing in this area.

***This is from Guidelines for the Application of Historic Resources Board  
Designation Criteria, Revised February 24, 2011, Page 6***

*“The Historical Resources Board of the City of San Diego acknowledges that such deed restrictions were unwarranted, discriminatory, and regrettable. Such restrictions play no role in the Board's designation actions. However, if such deed restrictions were part of a property's history, it is important information to acknowledge in a nomination so that the community does not forget.”*  
*Talmadge has honored this requirement, and we don't forget.*

- II. II. The information regarding contributing resources is incomplete, unconfirmed, and inconsistent with the level of due diligence required by this board.

***This is the actual statement from the Staff Report to the Historic Resources Board from January 25, 2014, Page 6.***

*However, staff agrees with the survey methodology as stated in the nomination and concurred with the classification of 94% of the properties reviewed in the random sampling. Given that 70 percent of the properties in the district as nominated have been identified as contributing, it is unlikely that any disagreements that staff may have in the classification of contributing and non-contributing resources would be so significant that the district would be ineligible for listing.*

Part I:

### **Racial Covenants:**

The only mention of racial covenants in the Talmadge Park Estates historical report is in Section 8, defending them as “not unique” 1 and “not illegal until 1948”.

***The exact quote from Talmadge Park Estate Historic District NR Draft is,***

*These restrictions were systemic racism and sadly were not unique. It was not until the U.S. Supreme Court's landmark decision in Shelley v. Kraemer (1948) made racial covenants illegal.*

Yet, in San Diego, most communities<sup>2</sup> did not have racial covenants. And those that did, danced around racial exclusion with words like “Planned and Protected for Particular People”<sup>3</sup>

*Wes' Footnote from **Mapping Inequity (Richmond edu)** addresses the Home Owners' Loan Corporation (HOLC) Map which was used to pinpoint areas that needed loans. This map did not necessarily reflect where racial covenants were located. He erroneously assumed the small number of Green sections of the map (lowest risk loan areas) meant San Diego only had a few areas with exclusionary covenants. Once again this was a redline map not a covenant map. The small Green areas reflected where*

*developments were still being built during the middle of the Great Depression. (1936). TPEHD would have been one of the small areas of Green on the map because we were less than ¼ built out. The Blue areas also reflected areas with covenant but were Blue instead of Green because they were already built out. Here is a description of a Blue area on the map, “there is no threat of foreign infiltration, and no racial concentration.” Therefore, the green areas were not the only areas with racial covenants, as Wes would like to insinuate.*

***Here is a quote from City of San Diego Appendix Assessment of Fair Housing, page 37.***

*“The use of racially restrictive covenants was common throughout the State of California and across the country in the late 19th and early 20th centuries and were found in many deeds in San Diego from roughly 1910 until they were ruled unenforceable by the Supreme Court in 1948”.*

*Wes’ own footnote from; **How Discriminatory Covenants Shaped San Diego Homeowners/ KPBS 9-24-2**, States, in several places, how common racial covenants were. Here is an example of one:*

*“The San Diego Realty Board, now called the San Diego Association of Realtors, formed around the time of these first covenants in 1911. In a sample of San Diego housing deeds from 1910 through 1950, Leroy Harris, a doctoral student at Carnegie-Mellon University, found every single one of them had racial restrictions.”*

1 Talmadge Park Estates Historic District NR Draft (ca.gov)

2 Mapping Inequality (richmond.edu)

3 How discriminatory covenants shaped San Diego homeownership | KPBS Public Media

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but no community went further than Talmadge as explicitly calling out the privileges that only Caucasians were afforded:

“That neither said premises nor any portion thereof shall at any time nor shall the interest therein ever be leased, sole, devised, conveyed to or inherited or be otherwise acquired by or become the property of any person other than of the Caucasian race.”

It is not right to think that racial covenants were common or justified just because other communities had engaged in similar practices at the time.



*Wes unsuccessfully attempts to misrepresent data to make TPEHD the worst representation of racism in San Diego. Racial covenants were common throughout the USA as his Footnote 3 documents. This type of exaggeration is an attempt to misrepresent the fact to support his anti-Historic District Agenda which is right out of the YIMBY playbook to deregulate the housing industry. Please see the Pennsylvania Law Review Article titled "[THE PERILS OF LAND USE DEREGULATION](#)" This article states very clear that deregulation is bad for affordability and people of color.*

Racial covenants are widely recognized as discriminatory and unjust practices that perpetuated racial segregation and inequality, contributing to the systemic disparities and long-lasting negative effects on minority communities that persist today.

*To repeat the above Guidelines, "Such restrictions play no role in the Board's designation actions. However, if such deed restrictions were part of a property's history, it is important information to acknowledge in a nomination so that the community does not forget."*

### **Racially Associated, Targeted Marketing:**

Talmadge Park Estates was then marketed to a certain type of homebuyer through association with the unscrupulous side of Hollywood.

*News Alert the movies in the 1920s were racist! This was not limited to United Artist movie executive Joseph Schenck. Once again, an attempt is made to over exaggerate racism in Talmadge as a way to delegitimize its worthiness as a historic district. On an interesting side note, Talmadge never had Jewish restrictive covenants, probably because Joseph Schenck was a Jewish immigrant from Oblast, Russia.*

Financier Joe Shenick helped name the community after his wife Norma Talmadge, who was best known for her Yellow-Face portrayal of a Chinese Princess with "clumsy pidgin English" in "Forbidden City" that critics called "gratuitous" 4 .

*According to [The Talmadge Sisters - Woman's Pioneer Project](#)," Her greatest commercial success was [the romantic Smilin' Through](#) (1922), but her greatest artistic successes were with director Frank Borzage in [Secrets](#) (1924) and [The Lady](#) (1925)."*

*Wes takes a quote out of context from Footnote 4. He claims that critics called the film Forbidden City "gratuitous." The actual comment only pertained to the male characters*

*in the movie, “The male Chinese characters (with one notable exception) are unremittingly ruthless in a manner that can only be regarded as gratuitous...”*

Critics also described her film “The Heart of Wetona” as “White Man's Burden fantasy where kindly Caucasians minister to violent people of color.”<sup>5</sup> Talmadge Park Estates Financer, Joseph Schneck produced these films.

Norma’s sister, Constance Talmadge was best known for starring in “Intolerance”, which was D.W. Griffith’s follow-up and defensive response to “Birth of Nation” a year earlier, where he said his critics were the intolerant ones<sup>6</sup> .

*Mr. Morgan attempts guilt through association between “Birth of a Nation” and D.W. Griffith’s next film “Intolerance” (1916). Politico publish an article on August 5, 2013, entitled **Griffith’s ‘Intolerance,’ a foundational film that’s also a great one, at Film Forum. The article states the following:***

*“Intolerance weaves together four stories: the fall of Babylon in 539 B.C., the crucifixion of Christ, the St. Bartholomew’s Day massacre in 1572, and a modern-day tale involving labor disputes, poverty, and being wrongly accused of murder. All four stories have something to do with intolerance in these tellings: persecuting those who are unlike us, massacring those of different faiths or creeds, or, even simpler, being cold-hearted towards those in need. *Intolerance* is a ultimately a cry for empathy and understanding.”*

In the same way that most communities at that time did not have covenants, most films were not as insensitive as those Joseph Schneck produced or the roles the Talmadge sisters portrayed.

*Mr. Morgan repeats the same lie again about covenants not being common. This has been documented already. He now is attempting to make Schneck and the Talmadge Sisters the poster children for the worst racism of the 1920s. Interestingly enough, **The Business Insider printed in July 1 ,2012, Shame on Hollywood: These Are The Most Racist Films Of All Time**, and neither Schneck nor the Talmadge Sister were featured in any of them.*

This association by real estate developers Roy and Guy Lichty was deliberate and effective to white homebuyers whose fear of minorities was reinforced by how Schneck and the Talmadge sisters portrayed them on screen. The developers successfully attracted those seeking spatial separation in a racially homogeneous neighborhood with restrictions that would protect property value and avoid what they perceived as undesirable demographic changes.

*There is absolutely no evidence to support the above comment. Roy Lichty wanted Hollywood money to invest in San Diego real estate. It was their money and fame he was looking for and not the racists' themes that ran through most movies of that discriminatory time.*

4 Yellowface Film Review #6: The Forbidden City | fumanchucomplex (wordpress.com)

5 The Heart of Wetona : a review (stanford.edu)

6 Intolerance (film) - Wikipedia

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### **Unfair Lending Practices & Redlining:**

The Talmadge Park Estates historical report makes no mention of redlining or unfair lending practices. Despite dedicating several pages to “FHA Era and Wartime Build Up During the Depression (1935-1944)”<sup>7</sup>, the report is neither complete or inclusive in consideration of how the community’s racial covenants directly influenced lending riskratings based on racial and ethnic characteristics.

### ***This is from Guidelines for the Application of Historic Resources Board Designation Criteria, Revised February 24, 2011, Page 6***

*“The Historical Resources Board of the City of San Diego acknowledges that such deed restrictions were unwarranted, discriminatory and regrettable. Such restrictions play no role in the Board's designation actions. However, if such deed restrictions were part of a property’s history, it is important information to acknowledge in a nomination so that the community does not forget.*

*This is a historic preservation submission, not a social justice report. This is not about an agenda to eliminate all historic districts by demonizing their past sins in the present in order to deregulate the housing industry.*

In 1936, the Home Owner’s Loan Corporation described Talmadge as “No ratio of concentration; no threat of infiltration, restricted to the Caucasian race”<sup>8</sup> and designated Talmadge Park tracts I, II and III as one of San Diego’s few “A – First Grade” (lowest risk) rated areas with the most favorable lending terms. Meanwhile, communities just outside the Talmadge gates suffered from higher-risk ratings and redlining, which systematically denied loans and insurance to individuals based on the racial composition of the neighborhoods.

*According to the Home Owner's Loan Corporation map Mr. Morgan references, there are two Blue Zones which were considered a good risk for lending purposes. The Red District Mr. Morgan is referencing is not "just outside the gates," but 8 blocks away.*

No infiltration of any inharmonious influences. No influx of any foreign element.

**Long Lasting Impacts:**

The City of San Diego's Assessment of Fair Housing in its 2021-2029 Housing Element notes Talmadge as one only of three "Racially Concentrated Areas of Affluence" 9 in the city while "Racially and Ethnically Concentrated Areas of Poverty" persist nearby just south of Monroe. The assessment conclusively draws connection from the redlining and covenants of the past to the inequities that have carried through to today including wealth disparities, property values, access to credit, educational disparities, health disparities, and community fragmentation.

*San Diego's Housing Element (p. HE-A-50) – If you look at the map and the description of areas of concentrated affluence, it doesn't include the proposed historic district, but adjacent Kensington.*

Today, The Talmadge Gates provide not just a physical boundary, but a socioeconomic divide where Talmadge Park Estates separates a 60% concentration of Caucasian population vs. neighboring Census Tracts 10 with as little as 6%. The Talmadge census tract also boasts 4X Per Capita Income, 5X Median Household Income, and 1/4th of persons below the Poverty Line as those neighboring communities.

*Regarding the census tract data, Mr. Morgan jumped over the adjoining census tracts so that he could produce the most exaggerated result. "4 TIMES" per capita income is a lot more effective at generating unexamined outrage than "1.5 times."*

2024 California CTCAC / HCD maps<sup>11</sup> identify "High-Poverty & Segregated" areas just a block away – meeting the standard for both high or "concentrated" poverty rates and racial segregation while Talmadge Park Estates is associated with positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.

*As far as fair housing goes, the Kensington-Talmadge Planning Group has a history of supporting affordable housing projects, with the result that approximately 10% of the units in Talmadge are deemed affordable. This is a high percentage for San Diego, so maybe the rest of the City should catch up.*

7 Talmadge Park Estates Historic District NR Draft (ca.gov)

8 Mapping Inequality (richmond.edu)

9 he\_appa\_assessmentfairhousing\_final.pdf (sandiego.gov)

10 Census Tract 20.02, San Diego, CA - Profile data - Census Reporter

11 Final 2024 CTCAC HCD Opportunity Map (berkeley.edu)

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### **Countless Reasons to Deny Designation:**

Historic designation will only perpetuate the impact of past discriminatory policies.

- The Talmadge Park Estates Historical Report neglects its complete history, focusing on only certain historical narratives while excluding others. It paints a skewed representation of the past that reinforces existing racial biases, stereotypes, and existing inequalities in the City of San Diego. By supporting designation, the HRB will create a perception that the district is meant to preserve the history of a specific demographic while ignoring or marginalizing others.

*Wes continues to misunderstand that this is not solely about racial covenants. This is about a neighborhood that was built during the Great Depression, one of the most difficult times in our nation's history. It is an example of the small house movement that made affordable, attractive, and well-built homes to help house aircraft workers so we could win WWII. This is about historic preservation of architecture not preservation of racial history.*

- While the unfortunate history cannot be reversed, these outcomes can be by Affirmatively Furthering Fair Housing (AFFH). This cannot be achieved once historically designated. Designation will block development of much-needed affordable housing projects such as development of ADUs, lot splits (e.g, SB9), and deployment of 'missing middle' housing, further exacerbating housing shortages, impacting marginalized groups disproportionately. This contradicts Fair Housing principles and the AFFH mandate that aims to promote inclusive communities.

*Historic designation does not freeze development for either contributors or non-contributors. ADUs in particular will continue to be built in Talmadge just as they are being built in other historic districts. Designation just sets standards for architectural compatibility, and In this context, historic districts are best understood as form-based code and missing middle housing in the real urban planning sense. Unless bad development is considered a goal and not an avoidable side effect, I don't understand what Mr. Morgan's opposition is to attractive development.*

- There is no civil rights event or victory to historically honor. For residents living in its proximity, the designation of Talmadge Park Estates would serve as a constant reminder of historical injustices, contributing to a continuing sense of inequality and marginalization.

*The people of color I know in the community do not feel that way. Many of them supported and volunteered to develop TPEHD. They are happy to be in an architecturally well preserved and maintained older community.*

- When property values rise<sup>12,13</sup> because of historic designation, access to affordable housing and other resources for marginalized groups becomes limited and creates barriers to upward mobility that contribute to a cycle of disadvantage.

*Because of the Mills Act, these homes could be more affordable for young families.*

- Historic designation imposes regulations on property use and modifications, limiting economic opportunities for property owners. This disproportionately affects individuals from marginalized backgrounds who may face barriers to participating in the preservation process.

*Once again you can build ADUs within a Historic District, therefore allowing “economic opportunities” and the Mill Act can help “individuals from marginalized backgrounds” get property tax benefits to maintain their home.*

The HRB can often be a forum of privilege where those who are most educated, charming, elegant with words, and flush with resources and time are able to further elevate their own prosperity and socioeconomic status.

*As an underrepresented historic district, TPEHD would like to help any other underrepresented group get historically designated. I have been eyeing potential districts in City Heights and Southeast San Diego.*

Days away from Black History Month and a week after MLK day, this is 2024 – and we should not only stop celebrating, designating, and protecting our scarred history, but making every effort to be more inclusive with our historical reports, promoting diverse

12 Your House Is In A Historic District: Does That Raise Or Lower Its Value? (forbes.com)

13 historicvalues.pdf (sohosandiego.org)

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representation within this forum, and acting to no longer condone the mistakes of our past.

*If Mr. Morgan is truly concerned about African Americans, he should not support the deregulation of the housing industry that has a long history of discrimination. Because when you deregulate that industry you end up having discriminatory practices in the present that hurt the people you say you care about. Further, it's easy to chastise FDR and the America of the 1930s for the racism of the FHA maps, but it's a lot harder for people to see how you are replicating the same outcomes today with segregated housing in the HAP 2.0 CCHS changes, Sustainable Development Area maps that overweight areas of low opportunity, and the reduction of for-sale housing through conversion of owner-occupied units into ADU apartment buildings and STVRs. San Diego's recent land use policies are more likely to increase racial disparities than to resolve them. Please review the [Law Journal](#) referenced earlier.*

Without designation, the structures within Talmage will continue to persist along with its history. Statues and monuments, place names, historical figures and sites, and architectural structures with controversial pasts or racist histories have all been reassessed, de-emphasized, or reevaluated. Many of them have been re-presented in a way that affirmatively recognizes and repairs the past vs. perpetuating it.

*The only controversy associated with TPEHD is your desire to use racial covenants to justify deregulating the housing industry. As soon as your strategy did not work at the HRB, you went to procedural arguments at SPRC. Because you did not understand preservation and Certified Local Governments that was shut down too.*

Community engagement, inclusive representation, and a thoughtful approach to preserving history can help address some of these concerns. It involves considering diverse perspectives and implementing policies that mitigate the negative impacts of historical districts on marginalized groups.

*We had community engagement, inclusive representation, and a thoughtful approach to preserving history. We just believe in TPEHD and Mr. Morgan believes in deregulating the housing industry.*

**Part II:**

Comprehensive analysis of the Talmadge Park Estates Historical Report reveals its inadequacies, marked by incompleteness, absence of confirmation, and notable inconsistency that falls short of the requisite level of diligence required by this board.

This is a lie. Once again Mr. Morgan cherry-picks and twists data to fit his anti-historic district agenda and not the truth. Please see [staff recommendations](#) that support the nomination.

Criterion E, as stipulated by the National Register of Historic Places, demands minimal due diligence, eschewing the validation standards mandated by local Historical Resources Board (HRB) Criteria A, B, C, and D. The absence of a historical report for each resource, coupled with the non-availability of essential documentation such as Sanborn Maps, Assessor's Building Records, and photographic evidence, places the burden squarely on city resources to verify designations and descriptions. These are often succinct and encompass fewer than 100 words each. Regrettably, the city's confirmation of designations through a cursory review and spot-checking is inconclusive.

*We have everything listed above in our computer-generated program. The information was used and reviewed and has always been available. The SHRC was so impressed with our assessment tool that they thought we should get a preservation award.*

The approval of designations en masse through this regulatory gap holds the potential to compromise the integrity of the City of San Diego's overarching historical program. Previous submissions have manifested instances where non-contributing resources were erroneously classified as contributing, boundaries underwent creative gerrymandering without appropriate reconciliation, and material alterations were inexplicably omitted from descriptions. In light of these concerns, I earnestly implore the board to contemplate the exclusion of Criterion E for Historic Districts or any



application encompassing more than one contributing resource, as a measure to fortify the reliability and rigor of the city's historical preservation framework.

*This whole document is filled with factual inaccuracies and distortions. No one should use his biased and dubious research in the future. As documented in the response, he is not an arbiter of the truth.*

Thank you for your time and consideration.

Sincerely, Wesley Morgan  
wesmorgan@gmail.com