January 25, 2024

Historical Resources Board 1222 First Avenue, MS 501 San Diego, CA 92101.

## RE: National Register of Historic Places Nomination for Talmadge Park Estates Historic District

As a resident of the proposed historic district with a contributing resource and as the co-author of the report for the designation in 2000 of the Talmadge Gates Historic District #422, I support the staff recommendation to the Historic Resources Board (HRB) that the HRB recommend to the California State Office of Historic Preservation the listing of the Talmadge Park Estates Historic District with a period of significance of 1926-1951 at a local level of significance under National Register Criteria A and C.

As the property owner (of over 30 years) of the one story singlefamily residence designed in the Minimal Traditional style, built in 1938 at 4558 Norma Drive, San Diego 92115, (APN 4654800200), and located within the boundaries of the district, the proposed nomination reflects and represents a significant period of history and character of pre and post WWII housing construction in San Diego. From the nomination:

> "The district retains integrity of design, materials, and workmanship. With the relatively high number of contributing buildings and low number of noncontributing buildings, the district retains a strong sense of time and place from its 1926 to 1951 period of significance and thus retains integrity of feeling and association. "

The Talmadge Park Estates Historic District, with its defining mix of Spanish Colonial Revival, Hacienda and particularly the Minimal Traditional houses, can be said to be derived from the Federal Housing Administration publication of 'Principles of Planning Small Houses'. My home, listed as #521 in the nomination, is a contributing Minimal Traditional home to the district. I would like to share the following description of "The Historic Context Of Minimal Traditional-Style Houses In The Washington Grove Historic District" in Washington Grove, Maryland, which highlights the similarity to Talmadge Park Estates Historic District nomination.

> "Minimal Traditional-style houses are generally small, one- to one-and-a-half-story residences featuring spare, distilled forms and elements of older architectural styles. They are typically compact in footprint, with square or rectangular massing. Front doors feature a small stoop or entry porch. Cladding is commonly wood or asbestos shingle siding. Roofs tend to be either side- or cross- gabled, with close eaves and rake and a low-to-moderate pitch.

> The Minimal Traditional style was developed largely out of necessity. During the Great Depression, banks collapsed, mortgages piled up, and many Americans lost their means to purchase new homes, bringing the housing construction industry to a virtual standstill. The Federal Housing Administration (FHA) was established in 1934 under the New Deal programs of President Franklin Roosevelt to set standards for construction and insure loans banks made for home building. The FHA also produced their own technical bulletins on house design that proved influential. In fact, a number of these house plans were published in journals and pattern books in the 1930s and 1940s, promoting an economical take on the traditional house.

> The FHA's technical bulletin in 1940 was called Principles for Planning Small Houses, which laid out a number of recommendations for an economical, efficient home. Many of the basic forms and variations of what became the Minimal Traditional style were illustrated in the pamphlet. The FHA recommended

simple compositions with limited variation in form. Unnecessary gables, dormers, and breaks in the roofline were to be avoided. Instead of adding ornamentation, character and variation could be achieved through the spacing and grouping of windows, the use of materials, and the design of minor details. "Porches, bay windows, and platform steps," the bulletin states, "are useful as a means of making small houses more livable without adding greatly to their costs." Efficient floor plans that maximized available space were advised, as higher building costs increased the difficulty in qualifying for FHA loan insurance.

During World War II, relocating workers for proximity to defense-related factories created an immediate and pressing need for small houses that could be built quickly. Builder-developers constructed nearly 2.3 million homes, most in the Minimal Traditional style, for war and defense purposes between 1940 and 1945. Such small houses were also a response to the wartime reduction in the supply of building materials."

I fully support and approve Talmadge Park Estates Historic District being listed on the National Register of Historic Places. This district represents a significant period of San Diego pre and early post WWII history and character and urge the Historic Resources Board to recommend to the State Historical Resources Commission to take action on the nomination and move to determine that the Talmadge Park Estates Historic District is deemed eligible for the National Register of Historic Places.

Sincerely yours,

Charles S. Kaminski

Charles Kaminski 4558 Norma Drive San Diego, CA 92115 858-956-9141

From:	Jeffrey Oliver
То:	Amy.Crain@parks.ca.gov
Subject:	RE: National Register of Historic Places Nomination for Talmadge Park Estates Historic District
Date:	Thursday, January 4, 2024 12:47:00 PM

California State Parks

Attn: Office of Historic Preservation Julianne Polanco, State Historic Preservation Officer P.O. Box 94296 Sacramento, CA 94296-0001 RE: National Register of Historic Places Nomination for Talmadge Park Estates Historic District

Dear Julianne Polanco and the State Historical Resources Commissioners, I support the nomination of Talmadge Park Estates Historic District (TPEHD) to be listed on the

**National Register of Historic Places**. I have lived in the Talmadge neighborhood district of San Diego since 2004 after buying my home here, however I've lived in San Diego my whole adult life. I'm now 54 years old. One of the things that's always impressed me about this neighborhood district is its ability to keep and maintain its historic charm despite the changing times and encroachment of progress in surrounding areas of the city. This is one of the few remaining charming bedroom neighborhoods left in the urban part of this city and I feel it's in the historical best interest of the city and it's citizens to maintain the look and feel of this neighborhood for generations to come.

Respectfully,

Jeffrey Douglas Oliver 4526 Estrella Ave San Diego, CA 92115 January 22, 2023

California State Parks Attn: Office of Historic Preservation Julianne Polanco, State Historic Preservation Officer P.O. Box 94296 Sacramento, CA 94296-0001

RE: National Register of Historic Places Nomination for Talmadge Park Estates Historic District

#### Dear Julianne Polanco and the State Historical Resources Commissioners,

My wife and I are writing to you to express our total, unqualified approval of Talmadge Park Estates Historic District being listed on the National Register of Historic Places.

I am writing to you to express my approval of Talmadge Park Estates Historic District being listed on the National Register of Historic Places. I have three reasons for wanting this prestigious designation. First, I love the architecture of the 1920s-1940s, which is greatly reflected in Talmadge. Secondly, I appreciate that this community avoided the last infill building movement of the 1960s and 1970s, thus retaining much of its original historic character and feel. Thirdly, because our origins come from both middle- and working-class families, we were hardworking then, and we are hardworking now to preserve our wonderful community.

I see a growing movement that is particularly worrisome to me which seeks to erase any traces of our collective architectural heritage from our urban landscape. Much like the destruction of Penn Central Station in New York City, this movement puts no value on our architectural past, or even the concept of beauty. Thankfully, this commission exists which allows for the protection of unique, historic communities from unthinking redevelopment.

In summary, Talmage is considered one of the best places to live in San Diego due to the ongoing connection with its heritage. To preserve what we have for this generation and the next, becoming Talmadge Park Estates Historic Districted listed on the National Register of Historic Places is what I strongly desire.

Please approve the Talmadge Park Estates Historic District.

Mark and Malaina Gusmann

Talmadge Resident 4611 49<sup>th</sup> St. San Diego CA, 92115

# TALMADGE NEIGHBORS

01/22/2024

#### To whom it may concern:

I have lived in Talmadge since August 2022, which makes me one of the newest neighbors, but it has quickly become my home. The neighborhood is unique not only because of the architecture of the homes, the history of the streets, and the stunning gardens surrounding those homes, but because of the community. It's a neighborhood where everyone not only knows their neighbors, but also looks out for them and lends a helping hand when needed. I've never lived in a place as safe, warm, and caring as Talmadge, but I feel fortunate to call it home and happy to call these people my neighbors. There aren't many neighborhoods like Talmadge left, especially in larger cities, and it deserves to be protected as a historical district.

Sincerely,

Ashley Herrin

Kelley Stanco, Deputy Director City of San Diego, Planning Department 9485 Aero Drive, M.S. 413 San Diego, CA 92123 Email: <u>KStanco@sandiego.gov</u>

Tim Hutter, Chair Historical Resources Board City of San Diego c/o Suzanne Segur, Senior Planner, HRB Liaison Email: <u>SSegur@sandiego.gov</u>

# 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 <u>respectfully deny the staff motion</u> 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 <u>consider a countermotion stating that the board</u> <u>neither condones nor supports designation or further recognition of a Talmadge</u> <u>Park Estates Historic District</u> for two primary reasons:

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

### <u>Part I:</u>

#### **Racial Covenants:**

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

<sup>&</sup>lt;sup>1</sup> <u>Talmadge Park Estates Historic District NR Draft (ca.gov)</u>

<sup>&</sup>lt;sup>2</sup> Mapping Inequality (richmond.edu)

<sup>&</sup>lt;sup>3</sup> How discriminatory covenants shaped San Diego homeownership | KPBS Public Media

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 <u>Caucasian race.</u>"

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. 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.

#### Racially Associated, Targeted Marketing:

Talmadge Park Estates was then marketed to a certain type of homebuyer through association with the unscrupulous side of Hollywood. 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*"<sup>4</sup>. 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>. 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.

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.

<sup>&</sup>lt;sup>4</sup> <u>Yellowface Film Review #6: The Forbidden City | fumanchucomplex (wordpress.com)</u>

<sup>&</sup>lt;sup>5</sup> <u>The Heart of Wetona : a review (stanford.edu)</u>

<sup>&</sup>lt;sup>6</sup> Intolerance (film) - Wikipedia

#### **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.

In 1936, the Home Owner's Loan Corporation described Talmadge as "<u>No ratio of</u> <u>concentration; no threat of infiltration, restricted to the Caucasian race</u>"<sup>8</sup> and designated Talmadge Park tracts I, II and III as one of San Diego's few "<u>A – First Grade</u>" (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.

#### 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*"<sup>9</sup> 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.

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 <sup>10</sup> with as little as 6%. The Talmadge census tract also boasts <u>4X Per Capita Income</u>, <u>5X Median Household Income</u>, and <u>1/4th of persons below the Poverty Line</u> as those neighboring communities.

2024 California CTCAC / HCD maps<sup>11</sup> identify "<u>*High-Poverty & Segregated*</u>" areas just a block away – meeting the standard for both high or "concentrated" poverty rates <u>and</u> 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.

<sup>&</sup>lt;sup>7</sup> <u>Talmadge Park Estates Historic District NR Draft (ca.gov)</u>

<sup>&</sup>lt;sup>8</sup> <u>Mapping Inequality (richmond.edu)</u>

<sup>&</sup>lt;sup>9</sup> he appa assessmentfairhousing final.pdf (sandiego.gov)

<sup>&</sup>lt;sup>10</sup> <u>Census Tract 20.02, San Diego, CA - Profile data - Census Reporter</u>

<sup>&</sup>lt;sup>11</sup> Final 2024 CTCAC HCD Opportunity Map (berkeley.edu)

#### **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.
- 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.
- 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.
- 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.
- 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.

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.

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

<sup>&</sup>lt;sup>12</sup> Your House Is In A Historic District: Does That Raise Or Lower Its Value? (forbes.com)

<sup>&</sup>lt;sup>13</sup> <u>historicvalues.pdf (sohosandiego.org)</u>

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

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.

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.

#### 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. 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.

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.

Thank you for your time and consideration.

Sincerely, Wesley Morgan wesmorgan@gmail.com

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Preserving Our Historic Neighborhood

January 11, 2024

California State Parks Attn: Office of Historic Preservation Julianne Polanco, State Historic Preservation Officer P.O. Box 94296 Sacramento, CA 94296-0001

(Via email, in care of Amy.Crain@parks.ca.gov)

Dear Ms. Polanco,

On behalf of Historic Kensington San Diego, a community organization dedicated to the preservation of San Diego's historic resources and a participating member of the Neighborhood Historic Preservation Coalition, we are writing to formally express our support for the nomination of **Talmadge Park Estates Historic District (TPEHD)** to be listed on the National Register of Historic Places.

It is important that the unique architecture in Talmadge from the Great Depression and beyond be preserved for this generation, and future generations. Historic wrought iron entry gates welcome one into this residential district, which reflects the development of an early automobile suburb in San Diego from the mid-1920s through the Great Depression – and continuing with early FHA principles through the post-WWII period into the 1950s. Talmadge's architectural styles include Spanish Colonial Revival, Minimal Traditional and early examples of the California Ranch style.

Respectfully submitted,

### Historic Kensington San Diego

David I. Roth

David L. Roth President

William N. Adair, Jr.

William N. Adair, Jr.

Secretary

cc: Eileen Magno, Principal Historian/Heritage Architecture and Planning
 Laura Henson, President/Talmadge Historical Society
 Bruce Coons, Executive Director - Save Our Heritage Organisation/NHCP

Historic Kensington San Diego – 4142 Adams Avenue - Suite 103 #326 – San Diego, CA 92116-2594

January 10, 2024

California State Parks Attn: Office of Historic Preservation Julianne Polanco, State Historic Preservation Officer P.O. Box 94296 Sacramento, CA 94296-0001

RE: National Register of Historic Places Nomination for Talmadge Park Estates Historic District

Dear Julianne Polanco and the State Historical Resources Commissioners,

My husband and I emphatically support the nomination for Talmadge Park Estates historic District, (TPEHD) to the National Register of Historic Places for the following reasons.

Establishing the TPEHD preserves the cultural history of our community. Talmadge records a vital part of San Diego's history, starting from immediately prior to the Great Depression, then co tinting through the establishment of President Franklin Delano Roosevelt's implementation of the FHA loan program to bolster the middle class and finally during United States' entry into WWII and resulting population boom experienced locally as a result. Preserving this neighborhood will afford future generations the ability to have a tangible connection to this pivotal moment in National History.

Furthermore, the TPEHD will help foster a sense of community by unifying residents through promoting a collective effort to merge the past with the present while preserving it for future generations. Here in our community of Talmadge, there is a genuine appreciation for our history and cherishing it! Establishing the Talmadge park estates historic district will very much continue this effort which this community has worked so hard to maintain!

In closing, I count myself blessed to have found a community steeped in history and rich with community pride. Preservation of this neighborhood through the establishment of the TPEHD will allow this very cherished community to remain here for generations to come. Thank you for your consideration.

Very Respectfully,

Attenet

Cameron Lindsay-Hewett

Talmadge resident and homeowner

[4758 Norma Drive San Diego CA, 92115]

January 11, 2024

California State Parks Attn: Office of Historic Preservation Julianne Polanco, State Historic Preservation Officer P.O. Box 94296 Sacramento, CA 94296-0001

RE: National Register of Historic Places Nomination for Talmadge Park Estates for Historic District

Dear Julianne Polanco and the State Historical Resources Commission,

I am writing to express my strong support of the Talmadge Park Estates being listed on the National Register of Historic Places. I have been a resident of Talmadge for nearly 20 years. The architecture of Talmadge reflects the 1920s-1940s. The neighborhood is a treasure to those who live here. Over 70% of the homes in our area maintain their original character, charm, and integrity despite the growing trend to erase this historic architecture in favor of multistoried apartment complexes.

The Talmadge community has been very involved in historic preservation including advocating for undergrounding the electrical wires and restoring street lamps and gates; all of which have been successfully completed. Our parkways are lined with trees and all streets have sidewalks which make it very walkable. Neighbors take pride in their houses and surrounding property and we wish to see the historic character of our neighborhood preserved for future generations.

The Talmadge community is worth preserving.

Annalisa Berta

Annalisa Berta Talmadge Resident 4630 49<sup>th</sup> St.