

Members of the City Historic Resources Board and committee members,

Thank you for allowing us the opportunity to speak.

We are from Valle Vista Terrace Historic District, which you and the City of San Diego helped to create in 2017. Thank you for your foresight!

As some of you may recall, in 2017 the City approached our community and presented a **Workshop** to convince the homeowners to create a historic district. There was an impressive PowerPoint presentation to explain to us what a historic district means, and what obligations we would have, and **what the City would do to protect and preserve the character of our community**. Those slides are still available online, by the way.

One slide specifically addressed proper treatment for additions: they should be located away from publicly-visible facades, compatible with the property, and should **NOT overwhelm the existing home**.

We compared this verbiage against Chapter 14, Article 3, Division 2, the San Diego Municipal Code addressing Historical Resources, and the Secretary of the Interior's Standards. Both are very clear that **any expansion or new building on a historic property should be secondary to the historic building, and be minimally visible and not distract from the significance of the historic home**.

Yet, less than 7 years later, the City is allowing the **permitting process for a 3-Story ADU behind a 1-story Mills Act home**, the 1913 Richard S. Woods House at 4785 Panorama Drive. Record number PMT-3198264. How can this possibly be sanctioned by the City and HRB?

We are predominantly a 1-story, single-family community with less than 25% of homes being 2 story. There are **no** 3-story structures, not even the apartment buildings. And the owners of the Woods House haven't lived there in years!

**If the project at the Woods House is approved**, it would set a devastating precedent. More absentee landlords will cap their converted garages with two-story ADUs, and our historic district will be overwhelmed with 3-story new construction. This would obviously obliterate the unique

and historic character of our 1-story community and destroy its charm and appeal. And it **would reduce our property values**. Would we even be considered a historic district anymore?

Where is the City's commitment to preservation that was pitched to us at the Property Owner Workshop in 2017? What happened to the protection of our historic neighborhood? Why did we agree to place limitations on alterations to our homes, when someone can build a new structure that towers over them? Did you know that FAA clearance was required for the three-story structure, due to its height? It's in the conditions for the permit.

Historic Valle Vista is comprised of about 90 homes. The City explained to us that even non-contributing homes in the District would benefit from increased property values, because the District's historic character would be preserved.

If the 3-story ADU is permitted, what will happen to the new owners of the roughly 30 homes that were purchased because of the unique character and appeal of our Historic District? New, three-story construction will certainly not add to the neighborhood charm. **Our property values will decrease with each new project that disregards the City's Historical Resources Regulations and does NOT comply with the Secretary of Interior's Standards.**

Please address and **halt this 3 story ADU permit before it's too late!** There is a growing group of Valle Vista homeowners who are angry and ready to **fight the City for lowering property values and neglecting the protections it promised in 2017.**

We urge you to exercise the authority given to you in the City's Municipal Code, and honor the commitment the City made to protect the character of our historic district.

Thank you.

Dear HRB Board Members,

May 29, 2024

This is a follow up from Thursday's HRB meeting, where during the Public Comments, myself (Faith) and my neighbor, Gina, spoke regarding our historic district - Valle Vista Terrace.

We would like to know **why the City never notified us** that **4785 Panorama Drive** plans to erect a **three-story ADU** next to their **single-story Mills Act home**? (DSD Permit Record No. 3198264) What about all their immediate neighbors, who also have single-story homes? **We are outraged**. This is wrong on so many levels! Below is a list of our homeowner concerns regarding the City and their responsibility to protect us!

1. A CEQA **Environmental Impact Review** is required, per California state law. (Cal. Code Regs. tit. 14, §§ 15064 & 15064.5.)
2. The proposed three-story ADU is a **substantial alteration** to a Mills Act house in a historic district. (San Diego Mun. Code, Ch. 14, Art. 3, Div. 2, §§ 143.0250, subds. (a)(1)&(3).)
3. A **Site Development Permit** is required, in accordance with Process Four, per San Diego Land Development Code. (*Id.*, §§ 143.0210, subds. (a)(2)&(3), (e)(2)(A)&(B); 143.0220, subd. (c) ("...new construction within a historic district is **not exempt** from the requirement to obtain a Site Development Permit except in accordance with Section 143.0220(a)").) **The public will see only the NEW 2-floor ADU above the historic house.**
4. A **Historical Resources Board public hearing** is required to consider whether the Mills Act should still apply to the property if a new three-story, income-generating "guest quarters" with two-floor ADU is built there. (*Id.*, § 143.0250, subd. (c).)
5. New construction of a three-story ADU next to a single-story Mills Act home does not follow the Secretary of the Interior's Standards for the Treatment of Historic Properties. "A property will be used as it was historically or be given a new use that **requires minimal change** to its distinctive .. **spaces and spatial relationships.**" (Rehabilitation Standard 1.) "**Changes that create a false sense of historical development ... will not be undertaken.**" (Rehab. Std. 3.)
6. "New additions ... or related new construction will not destroy ... spatial relationships that characterize the property. The new work will be differentiated from the old and will be **compatible with the historic ... features, size, scale and proportion, and massing** to protect the integrity of the property **and its environment.**" (Rehab. Std. 9.) (See page 161 from the [Secretary of the Interior's Standards with Guidelines](#), below.) Recommended by the Guidelines: "Ensuring new construction is **secondary** to the historic building and **does not detract** from its significance." (See page 162, below.)
7. The City must **preserve the Community Character**, as it told the residents it would do for a designated historic district (see Slide 24, below, from [July 29, 2017, presentation by San Diego Planning Department to property owners](#)).
8. As the City has acknowledged, "Additions should be **located away from publically [sic] visible facades.**" And "Should **not overwhelm** the existing house." (See Slide 30, below.)

9. The proposed three-story ADU **will not help the affordable housing issue**; there is no guarantee that rent for the home, guest quarters, and ADU will be affordable.
10. The proposed three-story ADU **will significantly add to street parking**, as it converted the garage to provide housing for at least three separate renters: the home, the guest quarters, and the two-floor ADU addition above.
11. The City will be **financially liable to recent homebuyers** who relied upon the historic district designation; a three-story ADU will lower the value of those homes, especially if others follow.
12. The City will be **liable to Valle Vista Terrace homeowners**, who agreed to limitations on their properties, with the understanding that all homeowners would be subject to the same limitations.

We would like a **written response from the City HRB Board**, addressing whether any of the above steps have been considered or taken in light of this being a Historic District. A nonconforming project will NOT protect our Historic District. This would clearly violate the agreement the City made with the Historic District homeowners and disregard the statutes that are in place **to protect our historic resources**. This kind of irresponsible action by the City would clearly degrade our 90-home historic community.

Construction of the three-story ADU **must be blocked**, along with any future nonconforming projects submitted for review.

Please let us know if you have any questions or need anything else.

Sincerely,  
The SAVE Valle Vista Terrace Historic District Team



**NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION**

RECOMMENDED	NOT RECOMMENDED
<b>Related New Construction</b>	
Adding a new building to a historic site or property only if the requirements for a new or continuing use cannot be accommodated within the existing structure or structures.	Adding a new building to a historic site or property when the project requirements cannot be accommodated within the existing structure or structures.
Locating new construction far enough away from the historic building, when possible, where it will be minimally visible and will not negatively affect the building's character, the site, or setting.	Placing new construction too close to the historic building so that it negatively impacts the building's character, the site, or setting.

[65] (a) This (far left) is a compatible new outbuilding constructed on the site of a historic plantation house. (b). Although traditional in design, it is built of wood to differentiate it from the historic house (which is red stucco) located at the back of the site so as not to impact the historic house, and minimally visible from the public right-of-way (c).



NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION

**NEW EXTERIOR ADDITIONS TO HISTORIC BUILDINGS AND RELATED NEW CONSTRUCTION**

RECOMMENDED	NOT RECOMMENDED
Designing new construction on a historic site or in a historic setting so that it is compatible but differentiated from the historic building or buildings.	Replicating the features of the historic building when designing a new building, with the result that it may be confused as historic or original to the site or setting.
Considering the design for related new construction in terms of its relationship to the historic building as well as the historic district and setting.	
Ensuring that new construction is secondary to the historic building and does not detract from its significance.	Adding new construction that results in the diminution or loss of the historic character of the building, including its design, materials, location, or setting.  Constructing a new building on a historic property or on an adjacent site that is much larger than the historic building.  Designing new buildings or groups of buildings to meet a new use that are not compatible in scale or design with the character of the historic building and the site, such as apartments on a historic school property that are too residential in appearance.
Using site features or land formations, such as trees or sloping terrain, to help minimize the new construction and its impact on the historic building and property.	
Designing an addition to a historic building in a densely-built location (such as a downtown commercial district) to appear as a separate building or infill, rather than as an addition. In such a setting, the addition or the infill structure must be compatible with the size and scale of the historic building and surrounding buildings—usually the front elevation of the new building should be in the same plane (i.e., not set back from the historic building). This approach may also provide the opportunity for a larger addition or infill when the façade can be broken up into smaller elements that are consistent with the scale of the historic building and surrounding buildings.	

Slides from [July 29, 2017, presentation by San Diego Planning Department](#)  
Slide 24:

 SD Planning

## How a Historic District Impacts Property

### Overview of Benefits

- Indirect Benefits for All Properties:
  - Increased Property Values
  - Preservation of Community Character
- Direct Benefits for Contributing Resources:
  - Application of State Historic Building Code
  - Conditional Use Permits to Allow Otherwise Unpermitted Uses
  - Mills Act Property Tax Reduction
  - New Benefits to Allow Zoning Deviations Pending (Fall 2017)

sandiego.gov

Slide 30:

 SD Planning

## How a Historic District Impacts Property

### US Secretary of the Interior's Standards for Rehabilitation

#### Examples of Proper Treatment

- Additions:
  - Should be located away from publically visible facades.
  - Should be compatible with the character of the house but differentiated.
    - EX: Slightly different siding, different rafter/eave treatment, simplified windows.
  - Should not impact character-defining or unique features.
  - Should not overwhelm the existing house.
  - Should not try to copy existing house or make the existing house "more historic".
  - Should not be more ornate or detailed than the existing house.



*"Does it look too tacked-on?"*

sandiego.gov