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October 23, 2025

Via E-Mail

Kristi Byers, Chairperson
Michael Taylor, Vice Chairperson
Rammy Cortez, 2nd Vice Chairperson
Lisa Cumper, Board Member
Carla Farley, Board Member
Dr. Eva Friedberg, Board Member
David McCullough, Board Member
Joy Miller, Board Member
Dr. Michael Provence, Board Member
Melissa Sofia, Board Member
Melanie Woods, Board Member
Historical Resources Board
City of San Diego
202 C Street, 6th Floor
San Diego, CA 92101

Re: 2660-2666 First Avenue - Support of Historical Resource Designation and
of Applicant's Request for Continuance

Dear Chairpersons and Board Members:

Chatten-Brown Law Group represents Uptown community members who have submitted extensive correspondence to the City of San Diego ("City") regarding the pending proposal for demolition of the 2660-2666 First Avenue's existing structure—designed by Master Architects Lloyd Ruocco and Homer Delawie—to pave way for construction of a six story structure and four-story underground parking garage into the steep slopes of Maple Canyon.

First and foremost, we support the application by Scott A. Moomjian; represented by IS Architecture ("Applicant"), to designate the structure at 2660-2666 First Avenue ("Property") as historic, for the reasons put forward in the Applicant's October 2024 Historical Report and IS Architecture's September 11, 2025 letter, and the Applicant's most recent letter to the Historical Resources Board ("Board") on October 21, 2025.

Our firm alerted the City to the Property's historic significance in a letter dated April 25, 2024, given the existing structure's Mid Century design and age. After review of the Property's building records revealed Lloyd Ruocco and Homer Delawie as the structure's architects, on October 26, 2024, our firm again alerted the City to the Property's historic resources. We

identified the existing structure's design by San Diego Master Architects Lloyd Ruocco and Homer Delawie, and its reflection of Ruocco's desire to protect San Diego's urban canyons through its preservation of the existing steep slopes on-site.

The California Environmental Quality Act requires analysis, disclosure, and mitigation of a project's significant impacts to historical resources. (Cal. Code Regs., tit. 14, § 15064.5 ["A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."].) As the City's Historic Resources Guidelines underscore, "[i]n a very real sense, the historical resources of San Diego belong to everyone, and their proper management is important to all of us."

Thus, it is important that the Historic Resources Board make an informed, accurate decision regarding the Property's existing structure, especially given Lloyd Ruocco's outsized impact on San Diego architecture, with a design geared towards preservation of urban canyons. The Applicant's experts put forward substantial evidence that the Property is a historic resource. And as the Applicant underscored in its October 21, 2025 letter to the Board, the Applicant received permission from the San Diego History Center to examine additional records in late October 2025 that are essential to the Board's determination of whether to designate the Property as historic.

Finally, the Board received a letter and "Memorandum Opinion" regarding the Property late Friday on October 17, 2025 from counsel for the property owner, which was not available for the Applicant's or public review until Monday October 20, 2025. Not only has this matter been docketed the past couple of months, but the property owner has been aware for almost a year that this nomination was pending, but chose not to submit any material until the last minute. The Board should continue the hearing to allow the Applicant time to address the Memorandum Opinion, and provide evidence from the San Diego History Center, so that the Board can make a fully informed decision. (See §123.0202 subd. (c).)

Thank you for your consideration of these comments.

Sincerely,



Kathryn Pettit

Allen Matkins

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Via Electronic Mail

October 22, 2025

Kristi Byers, Chairperson
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City of San Diego
202 C Street, 6th Floor
San Diego, CA 92101

**Re: 2660–2666 First Avenue, HRB Agenda Item 3, October 23, 2025 —
Opposition to Applicant’s Request for Continuance**

Dear Chairpersons and Board Members:

On behalf of San Diego American Indian Health Center, a federally Qualified Health Center and Indian Health Service funded 501(c)(3) nonprofit organization (SDAIHC), the owner of 2660–2666 First Avenue (Property), we submit this letter to oppose the Applicant’s request for a continuance and request that the Board hear Item 3 on October 23, 2025, without further delay.

1. **Prejudice to the SDAIHC.** The Applicant submitted a preliminary review for this Property on September 9, 2024, and then submitted a formal nomination on October 31, 2024, which is nearly one full year ago. During that year, SDAIHC has been unable to move forward with its redevelopment plans for the Property. SDAIHC and its consultants are prepared to proceed and should be provided the opportunity to move this process forward to a conclusion.

Kristi Byers, Chairperson
October 22, 2025

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2. **No good cause.** For the very first time, the Applicant asserts possible eligibility under Criterion A, and seeks additional time to substantiate this allegation. Criterion A is not supportable and the claims made in the request for a continuance are specious, at best. In fact, the continuance readily admits that a continuance is requested not to further develop new material facts, but instead to begin a search for unknown evidence, which can best be described as a fishing expedition. It would be patently unfair to continue a regularly scheduled hearing for that purpose.
3. **The record is sufficient for immediate action.** The information submitted by SDAIHC late last week provided exhibits to illustrate City staff's analysis; it did not present new arguments and/or advance a novel position. The Applicant has known staff's recommendation for well over a year, and they received a copy of the applicable Staff Report on October 9, 2025, at the same time as the rest of the public. The Applicant has failed to identify any new specific information that would affect the Property's potential historicity. A continuance to allow time to develop what the Applicant readily admits is an entirely speculative argument would be improper.
4. **Avoidable delay.** The Applicant has had more than a year to assemble any and all arguments in support of designation. Granting a continuance at this point would reward delay and invite an open ended search for information to undermine staff's repeated determination that the Property is not historic. We are opposed to any steps that condone such tactics.

For the reasons stated above, SDAIHC respectfully requests that the Board deny the continuance and allow Item 3 to go forward as planned on October 23, 2025.

Respectfully submitted,



Heather S. Riley

HSR:ptl

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October 21, 2025

Ms. Kristi Byers, Chair &
City of San Diego, Historical Resources Board (HRB) Members
202 C Street, Fifth Floor
San Diego, CA 92101

**Re: Request For Continuance—"The Milton Millman & Brent Campbell/ Lloyd Ruocco
& Homer Delawie Medical Building," 2660-2666 1st Avenue, San Diego, California;
HRB Agenda For October 23, 2025 (Item-3)**

Dear Chair Byers & HRB Members:

As the Applicant in support of the historical site nomination for the above-referenced property ("Property"), I respectfully request a Continuance until the November 20, 2025 HRB meeting. Such request is based upon the foregoing:

First, it has recently come to my attention that, in addition to its eligibility under HRB Criterion C (Architecture) and Criterion D (Notable Work of Master Architects), the Property also appears eligible under HRB Criterion A (Community Development) as a resource which exemplifies and reflects special elements of San Diego's cultural, social, aesthetic, historical, architectural, and landscaping development. The Property's vital and integral physical relationship with the adjacent Maple Canyon is central to this significance.

The development of this steep-slope site reflects the vision of senior architect Lloyd Ruocco, whose direct exposure to Maple Canyon from this location inspired his belief that San Diego's finger-canyon topography was a defining natural feature to be protected rather than paved. As a founding member of Citizens Coordinate for Century 3 (C3), Ruocco's advocacy for preserving the city's canyons and open spaces directly influenced the City's planning ethos and ultimately contributed to the adoption of the Steep Slope Guidelines in 1999.

Additionally, Ruocco's early activism inspired by the natural beauty of Maple Canyon, observed during the planning and construction of the Property, helped galvanize community opposition to the proposed U.S. 395 freeway expansion through Balboa Park and the Maple and Switzer Canyon connectors, thus reshaping the trajectory of San Diego's freeway system and marking the first inclusion of community opinion in its development and the first time that the State Division of Highways allowed local planning.

Ms. Kristi Byers, Chair &
City of San Diego, Historical Resources Board
(HRB) Members
October 21, 2025

Page Two—*Request For Continuance*

In order to explore this broader context in more detail, we have been afforded access at the San Diego History Center (SDHC) to examine and analyze the Lloyd Ruocco Papers and C3 records in late October 2025. A brief continuance in this matter will allow us the opportunity to identify and evaluate primary source material and further explore the importance of the resource to the natural, open-space environment.

Second, I understand that the City of San Diego received a letter to the HRB from Ms. Heather Riley, Esq. (Allen Matkins) with a Memorandum Opinion prepared by Ms. Jennifer Ayala (Nexus Planning & Research), on Friday, October 17th after 4:00 p.m. In addition, the correspondence was uploaded to the City's website and made available to the public only yesterday (Monday, October 20th) at approximately 1:00 p.m. Further, I received the material just this morning (Tuesday, October 21st). In order to carefully review and consider all of the claims set forth in the opposition documents to the historic site nomination, and in an effort to promote full and fair consideration by the Board in a manner which allows all parties sufficient time to consider all evidentiary material, a request for a short continuance is hereby requested and duly warranted.

Sincerely,

Scott A. Moomjian

Scott A. Moomjian
Attorney at Law



Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

October 21, 2025

Kelley Stanco
Deputy Director
City Planning Department
202 C Street, M.S. 413
San Diego, CA 92101
planning@sandiego.gov

Re HRB Hearing date: October 23, 2025
ITEM-3 2660-2666 FIRST AVENUE

Dear Chair Byers and Board Members:

On May 12, 2025 SOHO wrote the following letter to DSD and code compliance.

Re: Urgent Request for Code Enforcement Action – 2660-2666 1st Avenue, San Diego
CE-0534485

To Whom It May Concern:

On behalf of Save Our Heritage Organisation (SOHO), I am writing to urge prompt and decisive action on the ongoing code enforcement case concerning the property at 2660-2666 1st Avenue, also known as the Milton Millan & Brent Campbell/Lloyd Ruocco and Homer Delawie Medical Building.

Constructed in 1959, this property is a highly significant example of Mid-Century Modern architecture. A Historical Resource Research Report prepared by IS Architecture and submitted to the City of San Diego on October 31, 2024, found the property to possess a high degree of original integrity. It was determined to be individually eligible for historical designation under HRB Criterion C for its excellent representation of the Modern International style with Post and Beam influences, and Criterion D for its association with master architects Lloyd Ruocco and Homer Delawie, particularly during their rare and brief partnership.

Despite these professional findings, the City has twice failed to recognize the property's significance, denying eligibility in response to two Single Discipline Preliminary Reviews in August (PRJ-1099623) and October (PRJ-1123461) of 2024.

More troubling, on April 11, 2025, construction and demolition activities were observed at the property, including alterations to character-defining windows and sunshades. These actions threaten the building's architectural integrity and could jeopardize any future formal consideration by the Historical Resources Board. Although Plan-Historic staff were notified immediately, the matter was referred to the Building and Land Use Enforcement (BLUE) division, resulting in the filing of a complaint (CE-0534485), which remains under investigation.

SOHO respectfully requests that the Code Compliance Division expedite this case and ensure that the resource is properly protected. Without swift intervention, this irreplaceable and rare architectural resource may suffer irreversible damage, precluding its rightful consideration for historic designation.

We appreciate your attention to this urgent matter and are available to provide additional background or support as needed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce Coons", with a long, sweeping horizontal line extending to the right.

Bruce Coons
Executive Director