



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: August 19, 2026

TO: Historical Resources Board and Interested Parties

FROM: Alvin Lin, Associate Planner, Heritage Preservation, City Planning Department

SUBJECT: **REVISED ITEM 2* – 4230 JACKDAW STREET RECONSIDERATION**
**Addition of Attachments 7~10*

At the property owner's request, the Historical Resources Board considered the designation of 4230 Jackdaw Street at the April 23, 2026 meeting, consistent with [SDMC §123.0202](#). Staff did not recommend designation under any HRB Criteria due to a lack of integrity (Attachments 1-3). At the hearing, the Board passed a motion not to designate the property per staff's recommendation. As a result, the property was not designated.

The [Historical Resources Board Procedures](#) Section II. C. allows for a one-time reconsideration of votes in which the Board is the decision-maker, such as a decision to designate a property as historic or not. The Board may only motion to reconsider a previous vote if there are new facts, new or changed circumstances, or new laws that were not known and may have affected the Board's decision. On April 27, 2026, Cathy Morlino, an interested party, requested that the Board reconsider the item, consistent with the process described above. Morlino's formal letter (Attachment 4) and Legacy 106 Inc.'s document (Attachment 5) argue that the Board should reconsider the vote based on "new facts" and "new or changed circumstances" based upon "precedent-setting designations of the Bryans houses" at other locations, and that this information would have affected the Board's decision. At the June 25, 2026 Historical Resources Board meeting, the Board passed a motion to agendize the reconsideration of the designation of this property based on the ground of new facts.

At the June hearing, Heritage Preservation staff supported a motion to reconsider because the information submitted did constitute new facts not previously considered. However, as noted in the memo to the Board (Attachment 6), staff did not conduct a detailed analysis of the information presented in the request for reconsideration, which would occur if and when the Board passes a motion to reconsider the designation.

Since the June hearing, staff has reviewed the information presented in the request for reconsideration and finds that it does not change the original staff recommendation to not designate the property. The property's condition has not changed since April 23, 2026, and no

substantial new information has been submitted since the April hearing. Therefore, neither a new Historical Resources Research Report nor a new staff report has been prepared. This memorandum evaluates the new facts presented and supplements the original staff report issued on April 8th, 2026 (Attachment 2).

NEW FACT #1: OMITTED PRECEDENT

Morlino states in her letter that staff's analysis did not consider the precedent set by previously designated historical resources associated with Master Builder Edward F. Bryans. Morlino states that during the discussion of the item at the April HRB hearing, City staff "represent[ed] that NONE of the six previously designated Bryans houses had changes to their porches, such as enclosures." This assertion mischaracterizes the record. Heritage Preservation staff indicated that "we have typically not designated, or recommended against designation, if there were partial enclosures on the front facade or front elevations." Boardmember Sofia then asked whether other homes by Bryans had similar porch alterations as 4230 Jackdaw Street, to which staff responded, "from those examples on the screen, those porches are open," referring specifically to the applicant's PowerPoint presentation comparing 4230 Jackdaw Street with [HRB #495](#) and [HRB #822-45](#). The Morlino letter notes that [HRB #1096](#), also built by Edward F. Bryans, was designated with a front porch enclosure. However, HRB #1096 was not discussed, analyzed, or considered during the April HRB meeting. The following paragraph evaluates this newly raised information.

Regarding [HRB #1096](#), Heritage Preservation staff recommended against its designation at the March 28, 2013, HRB hearing, due to the presence of a front porch enclosure; however, the Board elected to designate the property under Criterion D for its association with Bryans. In most instances, staff would recommend against designation under HRB Criteria C and D if a Craftsman-style residential property's front porch has been enclosed, particularly when original exterior walls are removed for the enclosure, as such an alteration substantially impacts the resource's character-defining porch features and results in a significant impact to integrity of design, workmanship and materials, all of which are critical to conveying significance under HRB Criteria C and D. Moreover, comparing the "porch enclosure" of HRB #1096 with that of 4230 Jackdaw Street is not an equivalent comparison. At 4230 Jackdaw Street, the original exterior porch walls were permanently removed, whereas at HRB #1096, the original exterior walls remain in place, with the porch area glassed in and a solid door added. Staff contends that the porch alteration at 4230 Jackdaw Street has a greater impact on historic integrity than that of HRB #1096.

Morlino further asserts that the 2019 designation of [HRB #1338](#), an Edward F. Bryans home with modified front porch railings, serves as a precedent for "Bryans houses with acceptable changes to their porches." In this case, wooden picket balustrades were added along the sides of the porch, and a simple metal handrail was installed on the front porch steps. Adding front and side porch balustrades and railings is not comparable to constructing a front porch enclosure addition; the latter modification is substantially more impactful to a porch's plan, form, and design. Therefore, this cited "precedent" is not applicable to the evaluation of the front porch enclosure addition at 4230 Jackdaw Street.

Staff has considered the information submitted regarding HRB #1096 and #1338 and finds that the examples presented are not equivalent or comparable to the modifications that occurred at 4230 Jackdaw Street and their impact on the building's integrity. Therefore, the information presented does not impact the original staff recommendation to not designate.

NEW FACT #2: PORCH ENCLOSURE ADDITION AND BUILDER ATTRIBUTION

Morlino states in her April 27, 2026 letter that "wraparound or L-shaped porches were not a defining characteristic of Bryans, as can be seen in the report discussing Bryans' nomination as a master builder. Bryans built porches in a variety of shapes and sizes." Staff disagrees, the original L-shaped front porch is a physical feature repeated across a few of Bryans' properties and is attributable to his design approach, and modification of the porch results in a significant impact to integrity under Criterion D. Even if the original L-shaped porch was not a feature seen on a number of Bryans-designed homes, it was a feature of this particular home as he originally designed it. The [*Guidelines for the Application of Historical Resources Board Designation Criteria*](#) state, "a property important as a representative example of the work of a Master must retain most of the physical features and design quality attributable to the Master." Staff maintains that the loss of this original L-shaped front porch substantially impairs the property's ability to convey Bryans' design intent.

Lastly, Morlino suggests that Edward F. Bryans "could easily have been consulted to modify this [front porch] portion of a house he built not ten years earlier." This statement is speculative, as there is no evidence in the record indicating that Bryans participated in the design or construction of the front porch enclosure addition.

Staff has considered the information submitted regarding Master Builder Edward F. Bryans and continues to find that modification of the L-shaped front porch has a significant impact on integrity under HRB Criterion D. Therefore, the information presented does not impact the original staff recommendation to not designate.

NEW FACT #3: HRB PRECEDENT REGARDING PARTIAL ALTERATIONS TO THE FRONT FAÇADE

In documentation submitted on May 13, 2026, Legacy 106, Inc. presents three additional examples of properties with front porch modifications that the Historical Resources Board has designated, arguing that "there are many cases where the Historical Resources Board has designated buildings with changes on the front elevation over staff recommendation to not designate. All applicants should be treated the same." Before discussing the specific examples cited, staff would like to note that Heritage Preservation staff always endeavors to provide consistent analysis and recommendations based on the adopted *Guidelines for the Application of Historical Resources Board Designation Criteria*, even if such a recommendation may conflict with past Board designation actions. Additionally, resources that appear similar may nevertheless have very different development histories, and subtle differences, distinctions, and nuances can affect analyses, recommendations, and, ultimately, designation actions.

First, Legacy 106, Inc. cites [HRB #1113](#), designated in 2013, which was originally nominated under HRB Criteria C and D. Staff recommended against designation due to a porch alteration that reduced its overall size by approximately half. At the time of the HRB hearing, it was unknown what the

porch's original design and materials were. The Historical Resources Board designated the property under HRB Criterion D as a notable work of Master Builder Nathan Rigdon and as an important example of his early work in the Mission Hills Box style. Staff did not recommend designation of the property due in part to the impact of the porch alterations, and the information presented does not affect staff's analysis or recommendation regarding 4230 Jackdaw Street.

Next, Legacy 106, Inc. cites [HRB #610](#), designated in 2003, as an example in which a front-porch façade was altered, yet nonetheless designated. In this example, a front-façade window opening was enlarged to accommodate a French door. This property was later nominated under HRB Criteria A and C, and Heritage Preservation staff supported the designation. Subsequently, the Historical Resources Board designated the property. As noted in the [2003 staff report](#), "HRB approved the plans for the modifications as being consistent with the U.S. Secretary of the Interior's Standards." Additionally, the property was designated prior to the adoption of the 2009 *Guidelines for the Application of Historical Resources Board Designation Criteria*. As such, because this alteration was deemed to be consistent with the Secretary of the Interior's Standards, and the designation occurred prior to the adoption of the current designation guidelines, this is not relevant new information to the subject at hand. Therefore, the information presented does not impact staff's analysis or recommendation regarding 4230 Jackdaw Street.

Finally, Legacy 106, Inc. notes that [HRB #1077](#), which was nominated and designated under Criterion C in 2012, included a partial front porch enclosure. This is an example of a case where both staff and the Board supported the designation of a property with a partial front porch enclosure. Heritage Preservation stated in the [2012 staff report](#) that the "porch enclosure is not a significant impact to the architectural integrity because the original tapered square column roof supports, full length pedestals, and the cobble covered porch walls are still intact," and considering that windows were set in the original porch openings. Although it is unclear whether the original front façade wall behind the enclosure is intact, in this instance, staff determined that the original Craftsman character-defining features, such as the porch columns, pedestals, and masonry exterior, were sufficiently preserved to convey the presence of the porch and the building's Craftsman style. This differs from the alterations at 4230 Jackdaw Street, where a wing of the porch that gave it its L-shaped configuration was completely enclosed with walls and framing, resulting in no real sense or feeling of the original porch. Therefore, the information presented does not impact staff's analysis or recommendation regarding 4230 Jackdaw Street.

Staff has considered the information submitted regarding previously designated resources with porch enclosures and continues to believe that the porch modifications to 4230 Jackdaw Street have a major impact to integrity. Therefore, the staff recommendation to not designate under any HRB Criteria due to a lack of integrity remains unchanged.

CONCLUSION

Staff continues to recommend that the property located at 4230 Jackdaw Street not be designated under any HRB Criteria due to integrity loss from the front porch enclosure addition. The examples presented by Cathy Morlino and Legacy 106, Inc. demonstrate that staff has typically, though not

always, recommended against designation when a front porch has been enclosed or substantially modified, and that important distinctions and nuances between resources account for differing staff recommendations. While past staff recommendations and HRB designation actions are important to consider, both staff and the HRB must evaluate the integrity of each property on a case-by-case basis, as no two properties or their cumulative alterations are exactly alike. Integrity must be evaluated in accordance with the applicable HRB Criteria consistent with the *Guidelines for the Application of Historical Resources Board Designation Criteria*. Under Criteria C and D, the integrity of design, materials, and workmanship is most important. Staff maintains that the c.1928-1929 porch enclosure addition resulted in the loss of the original porch design, the original porch materials, and evidence of the original porch workmanship. Furthermore, this alteration diminished significance under HRB Criterion C for the Craftsman style, as it partially obstructs one of the original character-defining columns. Lastly, because the designer or builder of the prominent front porch enclosure addition has not been identified, staff cannot determine that the subject property retains its integrity under HRB Criterion D as a notable work of established Master Builder Edward F. Bryans.

In conclusion, the property does not retain integrity to be eligible for designation for the Craftsman style under HRB Criterion C, nor does it retain the integrity to be eligible for designation under HRB Criterion D as a representative example of the notable work of Master Builder Edward F. Bryans. Therefore, staff continues to not recommend designation under any HRB Criteria.



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AL/ss

- Attachments:
1. Applicant's Historical Report dated February 2026, under separate cover
 2. Staff Report for 4230 Jackdaw Street dated April 8, 2026
 3. Staff Memo for 4230 Jackdaw Street dated April 16, 2026
 4. Cathy Morlino letter dated April 27, 2026
 5. Legacy 106, Inc. document submitted on May 13, 2026
 6. Staff Memo for Reconsideration of the Designation of 4230 Jackdaw Street dated May 13, 2026 *[date is erroneous; the actual issue date is June 10, 2026]*
 7. Historical Resources Board Meeting, April 23, 2026 Video
<https://www.youtube.com/watch?v=PbDYsrXLOGo>
 8. Historical Resources Board Meeting, April 23, 2026 Minutes
<https://www.sandiego.gov/sites/default/files/2026-06/2026-4-final.pdf>
 9. Historical Resources Board Meeting, June 25, 2026 Video
https://www.youtube.com/watch?v=mg3_e7Ut2uk
 10. Historical Resources Board Meeting, June 25, 2026 Minutes
<https://www.sandiego.gov/sites/default/files/2026-08/2026-6-final.pdf>