

As a small property owner in your district, I am extremely concerned about the city's "Bungalow Court and Apartment Court Context paper" that will be submitted to the Historical Resources Board under the guise of "informational" only. Starting earlier this year, all the "information" in the statement has been used as a basis to convert most of the pre-1970's apartments into a historical resource! Your historical apartment repair, down to the most granular of elements, such as screw type, doorbells, light fixtures, and signage, MUST meet the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation." There have been many horror stories on how small property owners are involuntarily affected by these designations. There is no time to waste because the paper was out for public review on August 12, 2021, and due at the board on August 26, 2021.

Below are my major concerns:

--The "Bungalow Court and Court Apartment" style is way too broad because it is defined by a building configuration (U shape) of having a courtyard (garden or concrete). Please note how they changed the title of the report from the original title of "Garden Apartment" to "Apartment Court" which means you don't need a garden, just any open space would suffice! It literally means any apartment with an area in the middle or on the side would be considered as historical.

--Even worse, the staff is allowing ALL the variant styles into that context statement. For example, they would allow "Hybrid" which is where two different styles on the same parcel. Or, they would allow buildings that are added much later. There is even a "Half Court" style which is a row of apartments with some space at their front door.

--This study is not an independent study, but rather a concerted effort by the city staff to impose their sense of style and structural elitism on the general public. As noted earlier, the staff has already implemented these "context statements" into their review of properties before any public inputs.

--After this report is presented to the board, the public's chance of correcting the staff's designation of their property will be virtually eliminated. The following San Diego Reader article is a perfect illustration of the frustrations felt by San Diego residents toward this involuntary taking of property rights.

<https://www.sandiegoreader.com/news/2018/nov/14/cover-outdoor-museums-dont-pay-themselves/>

--The staff used the excuse of the grant deadline to ram this statement past the public. In this Covid 19 era, I am sure they can ask for an extension. This report came out on August 12th, and it will be presented to the board on the 26th!

--Recently, the topic of "Systemic Racism use of Preservation" has been raised. Designation of what is a historical resource should not be done too carelessly or too expeditiously because we must truly take into account all sides, so that systemic issues are not made worse.

<https://twistedpreservation.com/2020/06/02/systemic-racism-of-preservation/>

--It is very ironic that originally, these "Apartment Courts" were built to increase density to provide more affordable housing. Yet, now by lumping all of them into historical resources and limiting what can be done with these buildings, we are not accounting for the original historical purpose.

--Research has shown low-density developments produced nearly FOUR times the greenhouse gas emissions of high-density alternatives. With our climate crisis, we must make better use of these "courts" to help solve this upcoming climate disaster.

Please stop or at least slow down this process! We have many "Bungalow Court" buildings that fall under the "Context Statement" in your district. It is similar to declaring a historical district without notifying the residents. Furthermore, this historical designation is detrimental for most small property owners, and this process should be looked upon the same way as eminent domain. If you do nothing now, those owners will be detrimentally affected by your inaction.



## University Heights Historical Society

August 21, 2021

City of San Diego Historical Resources Board

1222 First Ave, 5th floor

San Diego, CA 92101

[historicalresourcesbrd@sandiego.gov](mailto:historicalresourcesbrd@sandiego.gov)

RE: Meeting Date 8/26/21, Agenda Item 5, San Diego Bungalow Court and Apartment Court Historic Context Statement

Dear Chair and Members of the Board:

On behalf of the University Heights Historical Society, I would like to express our deep appreciation to the Board and staff for developing the San Diego Bungalow Court and Apartment Court Historic Context Statement. This document will provide an excellent foundation for identifying and preserving our finite collection of historic bungalow courts throughout the mid-city area.

We are very supportive of all five of the proposed recommendations listed under “Preservation Goals and Priorities” beginning on page 79. In addition, we would like to suggest addition of a sixth recommendation to implement a *San Diego Bungalow Court and Apartment Court Multiple Property Listing* after the city-wide survey of bungalow courts and apartment courts outlined in Recommendation 1 is completed.

A *San Diego Bungalow Court and Apartment Court Multiple Property Listing* is a recommended policy in both the 2016 Uptown and North Park Historic Preservation Elements; “Prepare Historic Contexts and Multiple Property Listings addressing Bungalow and Apartment Courts, properties associated with Kate Olivia Sessions, and Victorian-Era properties for review and designation by the Historical Resources Board.”

We also support any policy initiatives to incentivize owners of bungalow courts and apartment courts to rehabilitate and maintain their properties. I spoke with a local bungalow court owner who is particularly interested in “resources for helping owners procure period-correct replacement parts such as windows.”

Thank you again for your efforts to preserve these finite resources and for the opportunity to review this outstanding report.

Sincerely,



# University Heights Historical Society

Kristin Harms, President  
University Heights Historical Society



# Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

Monday, August 23, 2021

City of San Diego  
Chair McCullough, Historical Resources Board & staff  
202 C Street  
San Diego, CA 92101

Re: August 26, 2021 agenda -Items 3 and 5

Chair McCullough, Board members & staff,

**Item 3: 4252 Alder Drive** - Save Our Heritage Organisation (SOHO) concurs with the staff report and finds this Spanish Eclectic style resource significant under Criterion B for an association with Abraham and Anne Ratner, important leaders within the San Diego Jewish community and the clothing manufacturing industry, as operators of the regionally significant Ratner Clothing Company. Also significant under Criterion C, this is an intact and good example of the Spanish Eclectic style with features that include the asymmetrical front façade, low-pitch hip roof clad in red clay tile, stucco focal chimney with embellished cap, divided light casement and bay windows, and a courtyard fountain.

**Item 5: Bungalow Courts and Apartment Courts Historic Context Statement (July 2021)**- SOHO reviewed the July draft Historic Context Statement and appreciates the amount of effort to create this important document as well as the proactive step to protect and preserve these important San Diego resources.

We find the historical narrative to be comprehensive and thorough, and support the bungalow and apartments court themes, including the property types and eligibility standards, as well as preservation goals and priorities. However, the bungalow and apartment court study lists should be expanded to include all the properties studied or clarified to explain why these representatives were included, i.e. high integrity, most unique, diverse representation, etc. SOHO appreciates inclusion of the local zoning evolution, which contributes to a better understanding for the geographic locations, clustering and construction timelines of these building types across the city. Zoning and other municipal regulations can be a valuable asset to understanding individual neighborhoods and building types, and should be considered moving forward when preparing historic context statements as well as retroactively. In addition, SOHO supports the Hybrid Bungalow and Apartment court building type. These hybrid examples, while more complex, over time, enhance our understanding of this building type.

SOHO supports the listed preservation goals and priorities, but recommend a plan to update this document be identified within it. Regarding Recommendation 1, we are eager for the comprehensive survey that documents extant bungalow and apartment courts across San Diego, building upon this context and study lists. While we recognize inclusion within the context statement itself does not equal designation eligibility, a full list of known or studied resources should be included as an appendix. Additionally, this appendix should include applicable details such as the court/apartment name, architect(s), general contractor(s), and landscape architects(s), which are significant to these courtyard typologies. The *Garden Apartments of Los Angeles Historic Context Statement*

<https://www.laconservancy.org/sites/default/files/files/documents/Summary%2C%20Garden%20Aparts%20>

[Historic%20Context.pdf](#) prepared for the Los Angeles Conservancy may be a helpful resource and offers a good matrix example. Supporting Recommendation 5, SOHO highly encourages the investigation of planning and policy initiatives that protect and preserve bungalow and apartment courts. SOHO supports Transferrable Development Rights (TDR) as a tool for preservation, as this could greatly reduce development pressures for this and other significant property types. However, steps to implement the TDR program should be included as well as how it might interact with other local TDR programs including downtown. We hope to see steps toward establishing an effective TDR program that can be a model in preserving these unique building typologies.

Bungalow and apartment courts are important historic urban housing typologies, which are still relevant today for their ability to attract diverse residents and provide naturally occurring affordable housing. As pointed out in the context, they were desirable as an alternative to the single-family home because they both provide access to outdoor space, privacy, and a central community location. As they continue to function well and be sought out today, highlighting this prevailing typology success within the statement would further signify the importance of retaining and preserving these resources. Further, a formal study to determine how these building typologies contribute to the city's naturally occurring affordable housing (NOAH) should be considered, which would illustrate how historical resources directly contribute to San Diego's NOAH.

Last, upon approval of the final context statement by the Historical Resources Board, in conjunction with the forthcoming Multiple Property Listing Ordinance, SOHO strongly encourages simultaneously designating a representative number of voluntary historical resources. This would use time and resources effectively, provide an incentive for property owners, and demonstrate support for these important building types, while also moving forward General Plan Historic Preservation Element goals.

Thank you for the opportunity to comment,

A handwritten signature in black ink that reads "Amie Hayes". The signature is fluid and cursive, with the first name "Amie" and last name "Hayes" clearly distinguishable.

Amie Hayes  
Senior Historic Resources Specialist  
Save Our Heritage Organisation