



**HISTORIC PRESERVATION**  
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January 6, 2008

Honorable Scott Peters, President  
City Council  
City of San Diego  
202 "C" Street  
San Diego, CA 92101

**Subject: Kensington Terrace Project, PTS No. 105244**

Dear Councilman Peters:

It is my professional opinion that the small house at 4166 Adams Avenue is significant as defined in the California Environmental Quality Act (CEQA) Guidelines, Section 15064.5 because it is **eligible for inclusion on the California Register**. I have completed historical landmark nominations that have resulted in over 50 historical landmarks throughout San Diego City and County. I have independently researched this house, its owners and occupants, its architecture, and its context within the surrounding community, and independently conclude this house has excellent architectural integrity and merits consideration as an important resource to the Kensington community. I urge the Council to Approve the Appeal because of significant new information not previously considered as well as significant procedural errors:

- Section 15064.5(4) clearly states that the building "**does not need to be listed on any register**" to be found significant under CEQA, although the Greater Mid San Diego Preservation Strategy of 1996 identified it as a contributing resource to a potential Kensington Historic District;
- The Planning Commission ignored the November 14, 2007, Memorandum, Office of the City Attorney. The California Appellate Court has directed in *League for the Protection of Oakland and Historical Resources v. City of Oakland* that **demolition of historic resources requires the City of San Diego to prepare an Environmental Impact Report**. The City Attorney failed to explain how Appellate Court decision, *Architectural Heritage Association v. County of Monterey*, 122 Cal. App. 4<sup>th</sup> 1095, changed the CEQA Guidelines to clearly state that **a building more than 50-years of age need not be listed on a local, state, or federal register to qualify as CEQA significant**. In this "Monterey Jail" case, the Court also directed that an EIR needs to be prepared when demolition of a CEQA significant building is proposed;

- Thus, the Planning Commission **made a significant and fatal mistake by relying on a 5-year old failure of the Historical Resources Board to designate 4166 Adams Avenue.** The Historical Resources Board staff will be the first to tell you they **do not make CEQA findings.**

Over **100 people** appeared at the Planning Commission and demonstrated there is a **significant public controversy over disputed facts and differences of professional opinion** on the **historical importance of 4166 Adams Avenue.** **Section 15064(4) of the CEQA Guidelines** require the City of San Diego to prepare an **Environmental Impact Report (EIR)** on the proposed demolition of 4166 Adams Avenue and the adverse effects of the proposed project.

A fair argument can be made to support 4166 Adams Avenue as historically significant:

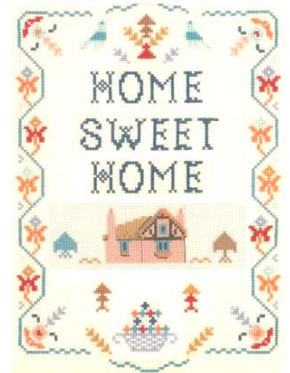
- **Memos of Historical Resources Board staff Terri Delcamp** support this 85-year old Colonial Revival Bungalow cottage with its distinctive hooded doorway as historically significant within the 1922-1923 period (Historical Resources Board Report No. P-03-066, March 13, 2003);
- **Delcamp** argued 4166 Adams Avenue **“was one of the first few (houses) on the block and along this area of Adams Avenue”** and **“exhibits distinctive features of the Craftsman era with Colonial Revival elements and retains its architectural integrity”** and **“staff’s opinion is that this home does exhibit several special features that may elevate it to an individually significant level”**
- The consultant’s report incorrectly identified the type of architecture and thus reached incorrect conclusions about its importance; did not discuss the national influences of the 1922-1923 period which clearly explains the importance of this small house; and did not discuss the builder, a firm that built other homes nearby and was important to the development of the early Kensington community.



Civil Engineer Roy Bennett and his wife Dora were new arrivals from New York who retained the **Great Western Building Company** to build their custom home in Kensington Park. The president of the company, **Fred C. Martin**, lived only a couple blocks away in Kensington Park on Kensington Drive.

**Significant new information** has emerged that is directly relevant to the appeal of the Planning Commission:

- The **Roy and Dora Bennett House at 4166 Adams Avenue** can be fairly argued as an excellent example of affordable housing in the 1920s; these small, affordable houses were part of a **national home ownership movement called the Better Homes Movement**;
- Historian Richard Pourande identified **Fred C. Martin, president of Great Western Building Company**, and G. Aubrey Davidson and Oscar Cotton as officers of the 1920 San Diego California Club, which was the first of the nation's "booster organizations." Its advertisements attracted new residents like the Bennetts to move to San Diego. They were natural promoters of the Better Homes Movement in San Diego (Martin's Great Western Building Company built 4166 Adams Avenue).
- This **Colonial Revival Bungalow cottage contributes to our understanding of the 1922-1923 Better Homes Movement** that began on the national promotion of the 100<sup>th</sup> anniversary of song-writer John Howard Payne's song "Home Sweet Home." Thus, the small house was "Home Sweet Home" for millions of Americans under this Movement. Without this national support, many would not have been able to afford a new home so soon after WWI;
- To commemorate the Better Homes Movement, the federal government **built a replica** of song-writer Payne's Colonial Revival Long Island, New York **home on the White House lawn** in Washington, D.C (*Morning Herald* [Pennsylvania] May 8, 1923;
- Secretary of Commerce Hoover created the "**Own Your Home Campaign**" by promoting John Howard Payne's Colonial house as the national ideal;
- Over **1,000,000 people** visited the Payne House on the Capitol lawn and newspapers across America **promoted small Colonial cottages** at the National Better Homes Demonstration of "Home Sweet Home." This house exemplifies elements of that Movement;
- President Warren G. Harding and Secretary of Commerce Herbert Hoover kicked-off the first **Better Homes Week in October 1922** for the National Better Homes Advisory Council. **Roy and Dora Bennett commissioned** their new house in the height of the new Better Homes Movement and the Great Western Building Company completed it in December, 1923.

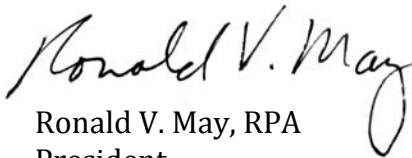


In conclusion, I urge the **City Council** to

- **Uphold the Appeal of the Planning Commission decision;**
- **Find the 85-year old 4166 Adams Avenue significant under CEQA;**

- **Direct the preparation of an EIR on the proposed demolition of 4166 Adams Avenue;**
- **Direct the City Attorney to review the relevant Appellate and Supreme Court cases cited in this letter as part of the EIR pertaining to CEQA significant historical properties;**
- **Consider this house as important as a custom small home built by the Great Western Building Company under the influence of the 1922-1923 Better Homes National "Own Your Home" Campaign and national movement.**

Sincerely,



Ronald V. May, RPA  
President

RVM:tvp

**Cc: San Diego City Council**

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