



Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

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Development Services Dept.
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Re: 820 Fort Stockton Drive

SOHO continues to agree with the technical report from Urbana Preservation and Planning, LLC previously submitted by the developer that concludes the property is eligible for the local register under criterions C and D. We also believe it can qualify for criterion A as a special element of the cities architectural and cultural development. There is a fair argument that it is also eligible for the California and National Registers at local level. 820 Fort Stockton Drive must be treated as a historical resource for purposes of environmental review. The submission of a new report appears to be an effort to obtain a different conclusion from the original report.

820 Fort Stockton Drive needs to be analyzed under criteria A as a rare, and particularly stylish example of an Arts and Crafts period duplex with two front porch entrances on a publicly visible corner site that remains extant in San Diego. This is a much beloved structure in the community and a cherished landmark.

The changes that are delineated in the new report from Nexus Planning and Research do not materially affect the conclusions of the prior report and these changes are mostly minor in nature. These changes are also added to and differentiated from the original materials. The changes are easily reversible without damaging the original materials that are still present. The occurrence of this type of small alterations are typical of a structure of this age and the adaptive reuses that the building has undergone in its long and useful life. These minor changes do not negatively affect the overall visual, historical and architectural integrity of this significant building. In fact, they illustrate the history of the structure and how the structure adapted to changing conditions over time.

In the 2016 Uptown Community Plan Historic Resources Survey Report, 820 Fort Stockton Drive was identified as an individually eligible resource and a contributor to the potential Arnold & Choates Historic District with a Status Code of "5S3."

The Urbana report states, “In the 2016 survey, the building was notated as minimally altered Craftsman bungalow. The 820 Fort Stockton Drive property is eligible for inclusion on the Local Register and is similarly eligible for listing to the CRHR or NRHP.” And that “The building meets the definition of an historical resource pursuant to Section 15064.5 of the CEQA Guidelines.”

The Urbana Report also provides substantial documentation for the inclusion of McFadden & Buxton as master builders and 820 Fort Stockton Drive as representative of their work.

The proposed project will require an EIR if there is any effort to remove or substantially alter the resource regardless of local designation status as there is “substantial evidence” in the record that this resource meets the “fair argument” standard under CEQA that 820 Fort Stockton Drive is eligible for the California Register and must be treated as a historic resource for purposes of environmental review.

Thank you for the opportunity to comment,

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

Bruce Coons
Executive Director