

January 22, 2025

City of San Diego Historical Resources Board
Chair Hutter and fellow Board Members
1122 First Avenue
San Diego, California 92101

RE: Historical Resources Board Meeting— January 23, 2025; Item 11: Designation of Leona and Albert Winger Bungalow Court as a Historical Resource

Chair Hutter and Board Members,

Thank you for the opportunity to provide public testimony regarding the proposed designation of the property located at 3655-3663 6th Avenue as a historical resource under HRB Criteria A and C. I am submitting this letter to express my opposition to the designation based on the analysis provided below.

Criterion A – Lack of Demonstrated Historical Significance

While the staff report claims that the property is a “special element of the historical development of the City” due to its representation of a hybrid bungalow court, the evidence provided does not sufficiently substantiate this claim. Specifically:

- The report relies heavily on the 2021 Bungalow Court and Apartment Historic Context Statement, which provides a broad framework but does not adequately address the unique significance of this specific property. Hybrid bungalow courts are identified as a “variant” of the bungalow court typology, yet there is no quantitative analysis or contextual comparison demonstrating the rarity or historical importance of this property within the City of San Diego.
- The staff report acknowledges that modifications, such as the rear porch enclosure, garage additions, and security bars, have occurred over time. While deemed minor, these alterations diminish the property’s integrity and weaken its ability to convey its historical significance as an example of a hybrid bungalow court.
- The assertion that the property’s proximity to the former San Diego Electric Railway line exemplifies the connection between public transit and housing is speculative and not directly tied to the subject property through documented evidence. This broad association does not demonstrate how this specific property played a significant role in addressing housing shortages during its period of significance.

Criterion C – Lack of Architectural Significance

The staff report claims that the property embodies the distinctive characteristics of a hybrid bungalow court, reflecting both Craftsman and Spanish Colonial Revival styles. However:

- Hybrid bungalow courts are described as possessing characteristics of both full and half bungalow courts, but the subject property does not adequately exemplify this typology. The inclusion of multiple architectural styles (Craftsman and Spanish Colonial Revival) is not uncommon and does not inherently confer significance.

- The staff report does not provide sufficient comparative analysis to demonstrate that hybrid bungalow courts, as a distinct typology, hold unique historical or architectural importance within San Diego. Without this context, the designation of this property sets a precedent without a clear basis.
- The property’s architectural features are described as “simplified” and “standardized,” which undermines its claim to architectural significance. The report does not adequately support its assertion that the property’s design is exceptional within the hybrid bungalow court typology.
- The presence of security bars, enclosed porches, and added garages further detracts from the property’s integrity of design, materials, and workmanship, which are critical aspects for designation under Criterion C.

Historical Resources Research Report by Scott A. Moomjian

The Historical Resources Research Report prepared by Attorney Scott A. Moomjian provides further evidence that the subject property does not meet the criteria for designation under HRB Criteria A and C. Specifically, Mr. Moomjian’s analysis states:

“In the present case, the 3655-3663 6th Avenue buildings were not constructed, consciously or otherwise, as a ‘bungalow court.’ Originally, the 3659 6th Avenue building was constructed as a Craftsman style, single-family residence in 1925. Thereafter, the remaining Spanish Revival buildings were added to the site in order to derive rental income—3655 and 3657 6th Avenue in 1927 and 3661 and 3663 6th Avenue in 1930. Collectively, the individual dwelling units total five (5) in number, were never placed or arranged around a communal garden. Further, the structures do not fit within any defined spatial arrangement for the bungalow court property type. Finally, the buildings were not erected along a streetcar line as 6th Avenue was never utilized as such. At the time the Property was built (between 1925-1930), the closest streetcar route was the Fifth Avenue line which ran along 5th Avenue north to University Avenue. Consequently, the Property does not derive any measure of significance as a ‘bungalow court’ and, as a result, it is not eligible for designation under Criterion A under the Uptown Context Statement.”

Mr. Moomjian’s report provides a detailed and persuasive analysis that challenges the characterization of the property as a hybrid bungalow court. It emphasizes that the property’s development was piecemeal and driven by rental income rather than a cohesive bungalow court design. Moreover, the absence of a defined spatial arrangement or communal garden further undermines its eligibility under HRB Criterion A.

I urge the Board to exercise caution in designating properties that do not clearly meet the criteria for historical significance, as this can undermine the integrity of the City’s preservation program. Thank you for your time and consideration.

Best regards,



Jennifer Ayala
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