LA JOLLA HISTORICAL SOCIETY 65 YEARS
MAIL PO Box 2085 La Jolla, CA92038
OFFICE & RESEARCH 7846 Eads Ave. • EXHIBIT GALLERIES 780 Prospect St.
T 858.459.5335 • lajollahistory.org

From:
Laura DuCharme Conboy, President, Board of Directors June 16, 2026

GROUNDS FOR APPEAL UNDER SDMC §112.0501 - Red Roost and Red Rest/PRJ-0698556

The approval authorizing demolition of the remaining historic fabric of the Red Rest and the associated environmental determination should be reversed because the findings are not supported by substantial evidence, the City's Historical Resources Regulations were improperly applied, the City improperly relied upon categorical CEQA exemptions, and the decision constitutes an abuse of discretion.

1. **The determination that Red Rest is no longer a historical resource is not supported by substantial evidence.**

The City's environmental and historical resources analysis is based on a threshold determination that Red Rest ceased to be a historical resource due to loss of integrity resulting from the October 2020 fire. Based on that determination, the City concluded that demolition of the remaining structure would not constitute an impact to historical resources.

Substantial evidence in the administrative record demonstrates otherwise.

The National Register nomination for the La Jolla Park Coastal Historic District, certified by the California State Historic Preservation Officer on April 4, 2024 and entered into the National Register of Historic Places on May 9, 2024, specifically identifies The Red Rest and The Red Roost as contributing resources within the historic district. The nomination expressly acknowledges that the Red Rest suffered substantial fire damage in 2020, was in a state of serious deterioration, and was partially covered with tarps. Nevertheless, the nomination concludes that the cottages remain contributing resources and states that "even in their current state, The Red Rest and The Red Roost evoke the feeling of early La Jolla and are in a prominent position opposite The Cove."

The nomination further states that, when determining contributing status within the district, integrity of location, feeling, and association were prioritized over integrity of materials.

Accordingly, preservation professionals, the State Historic Preservation Officer, and the National Park Service determined that Red Rest retained sufficient historic integrity and significance to contribute to the district despite the fire damage and deterioration. The City's contrary conclusion is unsupported by equivalent evidence and lacks a documented analysis explaining why a resource recognized as contributing to a National Register-listed district should no longer be treated as a historical resource.

2. **The City improperly excluded demolition of Red Rest from historical-resource impact analysis.**

The City expressly stated that demolition of Red Rest was not analyzed as a historical-resource impact because staff concluded that the building had effectively been "demolished" by the fire.

That conclusion improperly short-circuited the historical resources review process. The existence of fire damage does not automatically eliminate historical significance, particularly where the resource remained listed as a contributing element of a National Register-listed historic district after the fire occurred.

Because substantial evidence demonstrates that Red Rest continued to possess historical significance and retained integrity sufficient to contribute to the district, demolition of the remaining structure should have been analyzed as the removal of a historic resource. By excluding demolition from historical-resource review, the City misapplied its Historical Resources Regulations and reached findings that are unsupported by the record.

3. **The City failed to evaluate impacts to the Red Roost/Red Rest cottage ensemble and the La Jolla Park Coastal Historic District.**

City staff acknowledged that no formal analysis was prepared regarding the effect that removal of Red Rest would have on the integrity, setting, feeling, association, and historic character of the Red Roost/Red Rest cottage ensemble or the La Jolla Park Coastal Historic District.

Instead, staff concluded that removal would represent only a minor impact because the district contains other contributing resources. However, staff also acknowledged that no official document contains this analysis and that relevant comments exist only within internal project review records.

Red Rest was not merely one resource among many. The National Register nomination identifies Red Rest and Red Roost together as historically significant prototype California bungalows and recognizes their importance to the historic character of the district.

Removal of one half of this historically **recognized cottage pair necessarily affects the integrity, setting, feeling, and association of both the cottage ensemble and the district**. The City's failure to analyze those impacts deprived the decision-maker and the public of a complete evidentiary basis for approval.

4. **The City abused its discretion by failing to evaluate feasible preservation alternatives.**

The City stated that no alternatives analysis was required because it found no impact to historical resources.

That conclusion depends entirely upon the unsupported determination that Red Rest is no longer a historical resource.

The record demonstrates that Red Rest had been extensively documented through a Historic Structures Report, HABS documentation, National Register research, and preservation studies. The National Register nomination further notes that the cottages were documented to HABS standards and can be accurately repaired and/or reconstructed.

Given the recognized historic significance of the resource, the City should have evaluated feasible preservation alternatives including stabilization, retention of surviving historic fabric, rehabilitation, partial reconstruction, reconstruction utilizing salvaged materials, or other preservation approaches before approving complete removal.

The absence of any alternatives analysis is particularly significant because the permit itself requires salvage of historic materials and installation of an interpretive display, thereby acknowledging the continuing historical value of the resource. The City cannot simultaneously require preservation of historic materials for future use while asserting that demolition causes no impact to historical resources.

5. **The City improperly relied upon categorical exemptions because the historical-resource exception may apply.**

The City determined that the project is categorically exempt from CEQA pursuant to CEQA Guidelines Sections 15301 (Existing Facilities) and 15331 (Historical Resource Restoration/Rehabilitation). The City further concluded that the exception set forth in CEQA Guidelines Section 15300.2(f), concerning impacts to historical resources, does not apply.

That conclusion depends entirely upon the City's threshold determination that Red Rest no longer qualifies as a historical resource due to loss of integrity following the 2020 fire.

As demonstrated above, substantial evidence in the administrative record establishes that Red Rest continued to be recognized as a contributing resource within the National Register-listed La Jolla Park Coastal Historic District after the fire occurred. The National Register nomination, certified by the State Historic Preservation Officer and accepted by the National Park Service, expressly acknowledges the fire damage and deterioration while nevertheless concluding that Red Rest and Red Roost remain contributing resources that retain sufficient integrity of location, feeling, and association.

Because substantial evidence supports continued recognition of Red Rest as a historical resource, demolition of the remaining structure may constitute a substantial adverse change to a historical resource and may affect the significance and integrity of the La Jolla Park Coastal Historic District.

Under these circumstances, the City could not properly conclude that the historical-resource exception contained in CEQA Guidelines Section 15300.2(f) was inapplicable without first undertaking a complete analysis of the project's impacts on Red Rest, the **Red Roost/Red Rest cottage ensemble, and the historic district as a whole.** The City's failure to conduct such an analysis renders the environmental determination unsupported by substantial evidence and constitutes an abuse of discretion.

6. **The decision constitutes an abuse of discretion.**

The City's approval rests upon an unsupported threshold conclusion that Red Rest ceased to be a historical resource despite its continued recognition as a contributing resource within the National Register-listed La Jolla Park Coastal Historic District. Because that conclusion is unsupported by substantial evidence, all subsequent findings derived from it—including the findings that demolition would not impact historical resources, that no alternatives analysis was necessary, and that no district-level impacts required evaluation—are likewise unsupported.

For these reasons, the approval constitutes an abuse of discretion under SDMC §112.0501 and should be reversed or remanded for preparation of a complete historical resources analysis evaluating the effects of demolition on Red Rest, the Red Roost/Red Rest cottage ensemble, and the La Jolla Park Coastal Historic District.