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--A community organization dedicated to preserving the character, charm and historical resources of the Mission Hills neighborhood.

April 22, 2024

Historical Resources Board
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Re: ITEM #2 - Nomination of Arnold & Choate's Addition - North Florence Heights
Historic District
HRB Hearing Date: April 25, 2024

Dear Chair Hutter and Board Members:

Mission Hills Heritage (MHH), applicant for the nomination of Arnold & Choate's Addition—North Florence Heights historic district to the National Register, is mostly pleased with Staff's April 11, 2024, Report No. HRB 24-016, as amended by the April 17, 2024, memorandum (collectively "Staff Report"), which generally recommend that this Board support the listing of this district on the National Register of Historic Places. This letter highlights those portions of the Staff Report with which we agree and provides a suggested revision to the Staff Report's ultimate recommendation.

By way of background, when an applicant submits a nomination for the National Register and the nomination appears to be adequately documented and the property appears to meet the criteria for evaluation, it is incumbent upon the State Office of Historic Preservation ("OHP") to consult with the local government within whose jurisdiction the property is located. 36 CFR § 60.11(c); 36 CFR § 60.6(b). In this regard, the "State provides notice of the intent to nominate a property and solicits written comments *especially on the significance of the property and whether or not it meets the National Register criteria for evaluation.*" 36 CFR § 60.6(b) (emphasis added).

The Historic Resources Board ("HRB") was duly notified of the nomination and staff subsequently provided its recommendation, as follows in its 18-page Staff Report:

Recommend to the California State Office of Historic Preservation the listing of the Arnold and Choate's Addition-North Florence Heights Historic District with a period of significance of 1907-1950 at a local level of significance under National Register Criteria A and C and consider amending the nomination to expand the district boundary by incorporating the 24 properties identified in Table 1 of the staff

memo dated April 17, 2024 and potentially change the contributing status of the 6 properties shown in Table 2 of the staff report with a caveat that the proposed classifications of all contributing and non-contributing resources may not be adequately confirmed by staff due to the limited property-specific information and documentation requirements for National Register nominations.

As the Staff Report aptly recognizes, the district is significant under Criteria A and C with a period of significance of 1907-1950. Like the Staff Report, our research concluded that the proposed district is significant under Criterion A for its association with significant patterns of development facilitated by intraurban streetcar service. Primarily, the proposed district is the quintessential example of how the expansion of electric streetcar service in the early twentieth century shaped development patterns in San Diego. Likewise, we concluded, as did the Staff Report, that the proposed district is significant under Criterion C as an excellent, intact concentration of early twentieth century building styles. The district is quite distinctive for its wide range of architectural styles, yet it is remarkably cohesive in its aesthetic and visual character. Small scale commercial, mixed-use and institutional buildings—including stores, churches and schools—were woven into the community, supporting the development of the neighborhood. Importantly, the district has remained remarkably intact, despite significant redevelopment of surrounding areas in recent years. Accordingly, we applaud the Staff Report’s directive that the Board support the national register nomination under Criteria A and C with a period of significance of 1907-1950.

Next, the Staff Report recommends that the State Historical Resources Commission “consider amending the nomination to expand the district boundary by incorporating the 24 properties identified in Table 1 of the staff memo dated April 17, 2024.” We respectfully disagree. First, the boundaries of the district as proposed in the nomination comply with the guidelines set forth in National Register Bulletin 16B, which recommend leaving out peripheral areas that no longer retain integrity. The Staff Report makes no attempt to predicate its recommendation to amend the boundaries on any National Register requirements. Rather, it appears that staff simply prefers to straighten edges and corners of the boundary to avoid an “irregular boundary.” Furthermore, staff’s recommendation to expand boundaries is in no way probative of the proposed district’s significance and whether or not it meets the National Register criteria for evaluation, which is the primary purpose for which OHP seeks comments from the local government. See 36 CFR § 60.6(b). We therefore request that the Board not adopt Staff’s recommendation to amend the boundaries. Of note, however, we welcome a future discussion with Staff about expanding the boundaries of the district at a later date consistent with 36 CFR § 60.14(a). See Attachment, *Best Practices Review*, April 2023, Issue 3.

We are pleased that Staff concurs with the survey methodology and the classification of all but 6 out of the 352 properties within the proposed district. With respect to Staff’s recommendation to change the status of 6 specified properties within the boundaries of the proposed district per Table 2 of the Staff Report, we have carefully reviewed the properties and agree to change the status of these properties as recommended by Staff¹.

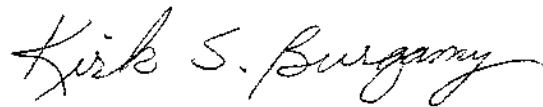
¹ One such property, 4111 Palmetto Way, was already listed as a contributor in the text of the nomination, but the table of district resources incorrectly identified it as a non-contributor.

Additionally, we are changing the status of 4128 Ibis Street to “contributor” based on some additional evidence the property owners provided that the most significant modification is easily reversible, and we are informed that Staff concurs with this change.

For the foregoing reasons, we ask the members of this Board to adopt the Staff Report's recommendation, absent the language related to expanding the district's boundaries. In making this request, we are mindful of Staff's significant efforts to evaluate the nomination and to formulate a recommendation. Yet the processes our team employed for compiling this nomination (including establishing boundaries), were rigorous and adhered to the guidelines set forth by the U.S. Department of the Interior/National Park Service for National Register listed historic districts. And those guidelines and requirements differ slightly from those used by staff in the processing of local historic districts. Indeed, the nomination represents the culmination of a two-years' grass-roots effort, including: preliminary historical research by MHH volunteers; compiling a list of properties within the district and sending notices of the proposed nomination explaining the process to owners of addresses within the district; a local publicity campaign, including an article in the Presidio Sentinel and multiple in-person meetings with interested neighbors; and, hours of MHH volunteers' time spent working closely with Architectural Resources Group to refine the nomination.

In closing, this unique neighborhood from our early history is a gem to be enjoyed by all residents and visitors for many years to come. We are grateful that the Staff Report recommends that this Board support the listing of this district on the National Register of Historic Places, and we thank you for considering our proposed revision to the Staff Report's recommendation.

Sincerely,

A handwritten signature in cursive script that reads "Kirk S. Burgamy". The signature is written in black ink and is positioned centrally below the word "Sincerely,".

Kirk S. Burgamy,
MHH Community Planning Committee



Best Practices Review

A quarterly publication on National Register Bulletin guidance

Amending National Register Documentation

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Introduction

The National Historic Preservation Act of 1966 authorizes the Secretary of the Interior to “expand and maintain” a National Register of Historic Places. “Expanding” is accomplished through new nominations; “maintaining” is done through amending existing listings. This *Best Practices Review* addresses how to amend National Register listings.

The National Register is a Federal planning tool. To be an effective tool, the National Register should be kept up to date. The earliest nominations to the National Register of Historic Places were submitted in 1969, three years after the program was codified in the National Historic Preservation Act. Between the law’s enactment and the first nominations, the National Park Service developed regulations, created a standard form, and provided instructions to the newly created state liaison offices (today’s State Historic Preservation Offices). Over time, documentation standards for nominations evolved and understanding of historical significance broadened. As the program matured, some areas of significance were dropped and new ones were added.

Older nominations, especially those from the earliest decades of the program, are often deficient by today’s standards. In many cases, boundaries are ill-defined, descriptions are vague, or resource inventories are lacking. Potential additional criteria, areas of significance, or periods of significance may have been overlooked. In some situations, properties may have physically changed since their initial listing. Nomination documentation for a listed property may be amended to more accurately present a property’s historic significance and physical characteristics and condition.

Process

Amendments are submitted by nominating authorities (State or Tribal Historic Preservation Officers, or Federal Preservation Officers) on National Register forms, and it is the nature of the amendment that determines the process. There are two types of amendments: technical and substantive.

Technical amendments correct mistakes or provide new information about a property’s physical nature, such as a revised property description or resource inventory, new photographs, or updated maps. However, new

This publication compliments the guidance provided in National Register Bulletins by providing examples on specific topics. Your feedback is welcome; contact Sherry Frear, Chief & Deputy Keeper, sherry_frear@nps.gov.

For copies of the nominations referenced in this document, please visit our [Database and Research](#) page.

For National Register Bulletins and other guidance, please visit our [Publications](#) page.

All images are from National Register nominations unless otherwise noted.

contextual information may also be considered a technical amendment if there are no proposed new criteria, or area(s) or period(s) of significance. Technical amendments may be submitted directly by the nominating authority to the National Register without owner notification or review by the State Review Board. The nominating authority may choose to pursue owner notification and/or State Review Board review, but it is not a requirement.

Nominations Cited

Ashville School, North Carolina

NR Ref. 96000614

Oxford Historic District, North Carolina

NR Ref. 88000403 (original nomination)

NR Ref. 100005974 (boundary increase/decrease)

St. Albans Historic District, Vermont

NR Ref. 88000335 (original nomination)

NR Ref. 100008758 (boundary increase)

These nominations, and others, addressing boundary changes and additional documentation may be found on [Sample Nominations](#) page of the National Register website.

Substantive amendments are those that require an opinion, such as adding a new criterion or new area of significance; changing the period or the level of significance; or changing the property's boundary.¹ Substantive amendments processed by State Historic Preservation Officers must be reviewed by the local commission (if the property is within the jurisdiction of a Certified Local Government) and the State Review Board, since the proposed amendments may require, for example, evaluation of proposed new criteria or one or more new areas, levels, or periods of significance. As with a new nomination, the local commission and State Review Board will review the proposed amendment and make a recommendation to the State Historic Preservation Officer.

For individually listed properties, property owner notification is not required; the National Register's regulations on property owner notification (described at 36 C.F.R. § 60.6(c)) afford a private property owner the opportunity to object *to the listing* of their property in the National Register but since the property is already listed, a property owner's objection in this process is

moot. Likewise, local official notification (also described at 36 C.F.R. § 60.6(c)) is not required. Nevertheless, procedural transparency is a good practice, and property owner and local officials notification is recommended as a courtesy.

For historic districts, property owner and local official notification is not required *unless* an amendment proposes a boundary change. For boundary *increases*, all private property owners within the new area(s) must be afforded the opportunity to comment on or object to the inclusion of their property in the historic district. If a majority of private property owners within the proposed area object to the amendment, the National Register will not accept the boundary increase for listing (but nevertheless will make a determination as to whether the area is otherwise eligible for listing). For boundary *decreases*, all private property owners within the area(s) to be removed from the historic district must be afforded the opportunity to comment on the removal of their property(s) from the historic district; however, National Register regulations do not provide that these private property owners can block the decrease by objecting to it.

For a property's resources—such as a structure within a single property or a building in a historic district—if an amendment changes the status of a resource from contributing to non-contributing (or vice-versa), a courtesy notification may be sent to the property owner(s). Since the property itself is already listed, and a change to a resource with that property does not affect the fact that the property is listed, any objection from a private property owner to a *resource's* status has no effect on the *property's* status and thus property owner notification is not required according to National Register regulations.

¹ Moving a property is not considered a boundary change. The requirements for relocating properties listed in the National Register are described at 36 C.F.R. § 60.14(b).

Form and Format

Amendments to National Register listings are made on National Register forms, but just which form is used depends on the nature of the amendment. The 10-900 Registration Form, 10-900a Continuation Sheet, and 10-900a Modified Continuation Sheet may be downloaded from the National Register website. (Figure 1, 10-900a Continuation Sheet, and 10-900a Modified Continuation Sheet.) There has been, and will continue to be, flexibility in formatting Registration Forms and Continuation Sheets—the National Register will not return a form for lack of parentheses as recommended at pages 5 and 6—but this document presents best practices for amending nominations.

The image shows two overlapping forms. The top form is NPS Form 10-900-a, titled "National Register of Historic Places Continuation Sheet". It includes the header "United States Department of the Interior National Park Service" and "National Register of Historic Places Continuation Sheet". A box on the right contains fields for "Name of Property", "County and State", and "NR Reference Number". The bottom form is also NPS Form 10-900-a, titled "National Register of Historic Places Continuation Sheet". It includes the same header and title. A box on the right contains fields for "Name of Property", "County and State", and "NR Reference Number". Below the box, the form contains three certification sections: "State Certification", "Federal Agency Certification", and "National Park Service Certification". Each section includes a paragraph of text and a line for "Signature of Certifying Official/Title" and "Date of Action".

NPS Form 10-900-a

OMB Control No. 1024-0018
expiration date 03/31/2026

United States Department of the Interior
National Park Service

National Register of Historic Places
Continuation Sheet

Name of Property
County and State
NR Reference Number

NPS Form 10-900-a

OMB Control No. 1024-0018
expiration date 03/31/2026

United States Department of the Interior
National Park Service

National Register of Historic Places
Continuation Sheet

Name of Property
County and State
NR Reference Number

State Certification

As the designated authority under the National Historic Preservation Act, as amended,
I hereby certify that this ___ additional documentation ___ additional documentation: name change
___ move ___ removal ___ other
meets the documentation standards for registering properties in the National Register of Historic
Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

Signature of Certifying Official/Title Date of Action

Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,
I hereby certify that this ___ additional documentation ___ additional documentation: name change
___ move ___ removal ___ other
meets the documentation standards for registering properties in the National Register of Historic
Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

Signature of Certifying Official/Title Date of Action

National Park Service Certification

I hereby certify that this property is:
___ entered in the National Register
___ determined eligible for the National Register
___ determined not eligible for the National Register
___ removed from the National Register
___ additional documentation accepted
___ other (explain:) _____

Signature of the Keeper Date of Action

Figure 1. 10-900a Continuation Sheet, and 10-900a Modified Continuation Sheet, available at [National Register Forms](#).

Technical amendments address corrections or additions to specific sections of the original nomination form and are submitted on continuation sheets. The Modified Continuation Sheet includes certification blocks for both the nominating authority(s) and the Keeper of the National Register, and serves as the first page of the amendment. The next page should be a Continuation Sheet with a brief explanation of and justification for the change(s) that follows on subsequent Continuation Sheets. Each of these subsequent Continuation Sheets' headers should indicate the section of the original nomination that is being amended by the information on that page. For example, when correcting an address, the header should read "Section number 2." The corrected address would then be added in the area below the header. If updating a property description, the section header should read "Section number 7" and, again, the new information—such as a new narrative description or revised resource inventory—should be added in the area below it. (Figure 2, portion of completed 10-900a Continuation Sheet showing page header and narrative description.)

Substantive amendments may be submitted on 10-900a Continuation Sheet *if the boundaries are not changed*. (More on boundary changes on the next page.) Like technical amendments, a signature page—10-900a Modified Continuation Sheet—is required and all Continuation Sheets should be identified by the appropriate header with section and page number.

However, if the new information in the substantive amendment is extensive, a complete, new 10-900 Registration Form should be submitted to "replace" the original form. (The original form is not actually replaced; it remains a formal record for the original listing of the property.) The new form should have current information in all ten sections. Any information that is still relevant may be transferred from the original form to the new form, with the source and author of the original materials acknowledged in the text and bibliography.

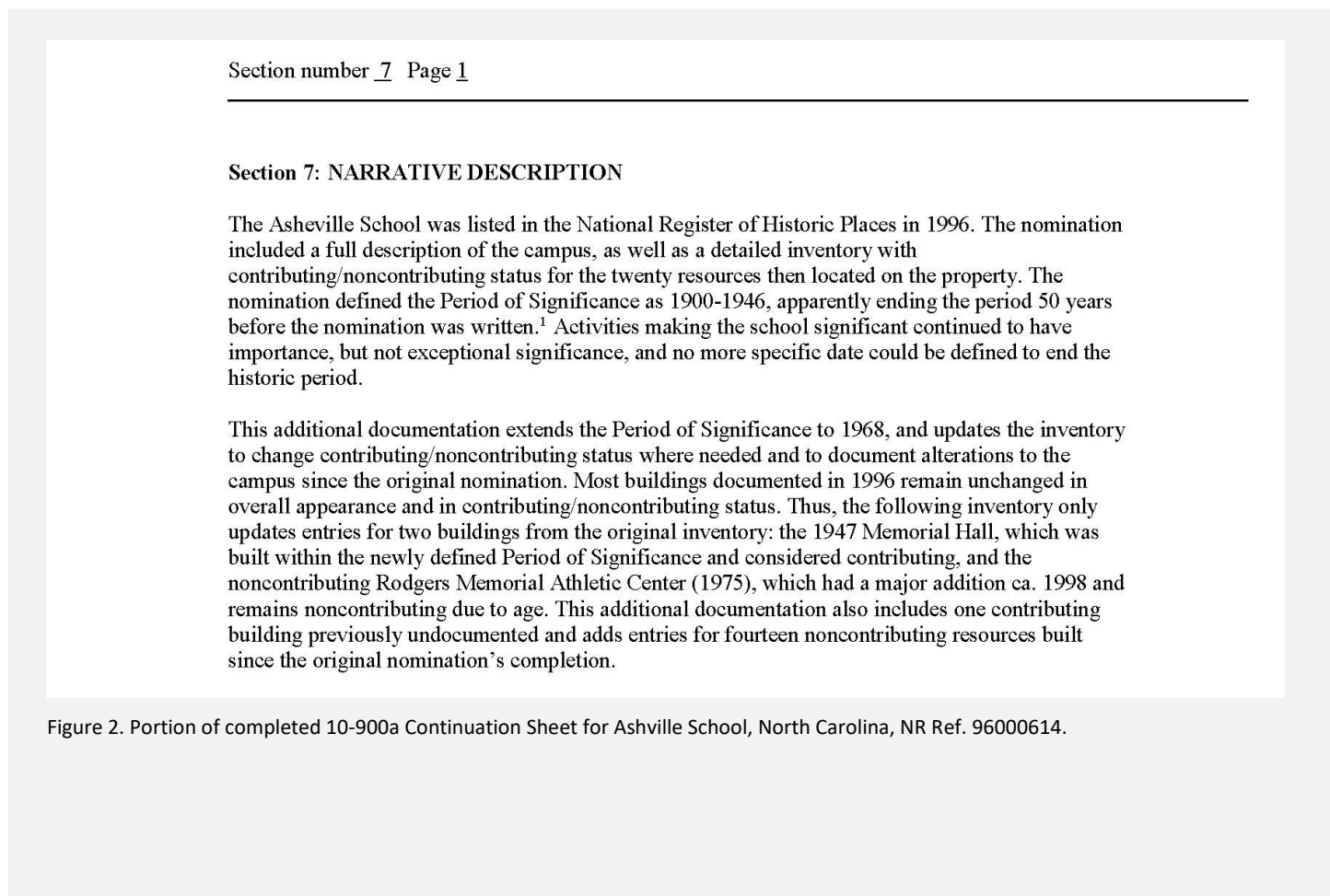


Figure 2. Portion of completed 10-900a Continuation Sheet for Asheville School, North Carolina, NR Ref. 96000614.

The property name shown in Section 1 “Property Name” and shown on page headers should include the parenthetical “(Additional Documentation),” e.g., “Smith Historic District (Additional Documentation).” This signals to the reader that this Registration Form contains the most current information for the property, replacing the information in the original form.

For an updated district or individual property with multiple resources, a new sketch map indicating the contributing status of all resources is required. New photographs depicting the current conditions of the property should also be submitted.

Boundary changes are by regulation, described at 36 C.F.R. § 60.14(a), considered to be a new property nomination so a new 10-900 Registration Form—not a Continuation Sheet—must be completed.

Four justifications exist for altering a boundary:

- professional error in the initial nomination
- loss of historic integrity
- recognition of additional significance
- additional research documenting that a larger or smaller area should be listed.

One (or more, if needed) of these justifications should be clearly addressed in the new 10-900 Registration Form.

While it’s likely that much of the information from the existing listing may be transferred to the new Registration Form, the new form must include information specifically addressing the increased or decreased area(s). Section 2 “Location” should include additional locational information and Section 10 “Geographical Data” should include a new boundary description and justification for the entire property; however, to assist the National Register in accurately recording data in its National Register Information System (NRIS), acreage should identify “previously listed” and “increase” and/or “decrease.” (Figure 3, recommended additions to 10-900 Registration Form for boundary increases or decreases.) The narrative description at Section 7 and the narrative statement of significance at Section 8 should describe the conditions and significance of the boundary increase or decrease. For a boundary *increase*, the historical context included in Section 8 should identify the “previously unrecognized significance”—as required by 36 C.F.R. § 60.14(a)(2)—of the additional properties or resources, and explain how these additional properties or resources are related to the already-listed property. For a boundary *decrease*, Section 8 should describe the reasons for their removal.

When submitting a boundary change, the property name in Section 1 “Name of Property” and all page headers should include the appropriate parenthetical “(Boundary Increase)” or “(Boundary Decrease),” e.g., “Smith

Show total acreage here

10. Geographical Data

Acreage of Property _____

Acreage previously listed in the National Register _____

Acreage of boundary increase _____

Acreage of boundary decrease _____

Figure 3. Recommended additions to 10-900 Registration Form for boundary increases or decreases.

United States Department of the Interior
National Park Service
National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: Oxford Historic District (Additional Documentation, Boundary Decrease, and Boundary Increase)

Other names/site number: N/A

Name of related multiple property listing:

Historic and Architectural Resources of Granville County, North Carolina

(Enter "N/A" if property is not part of a multiple property listing)

United States Department of the Interior
National Park Service / National Register of Historic Places Registration Form
NPS Form 10-900 OMB No. 1024-0018

Oxford Historic District (Additional Documentation, Boundary Decrease, and Boundary Increase)
Name of Property

Granville County, North Carolina

County and State

Figure 4. Property name formatting recommendation for additional documentation, boundary increases, and/or boundary decreases, as presented in Oxford Historic District, North Carolina, NR. Ref. 100005974.

Historic District (Boundary Increase).” The abbreviations “BI” and “BD” are acceptable. Accompanying materials, such as maps and photographs, should clearly depict and differentiate the area(s) of the increase or decrease.

Combined Actions

In some cases, a State or Tribal Historic Preservation Officer, or Federal Preservation Officer, may choose to combine two or more actions in a single nomination amendment, *e.g.*, a boundary increase and revised or new information. The National Register terminology for revised or new information is “additional documentation.” In these situations, a new 10-900 Registration Form—not a Continuation Sheet—must be completed. The new action should be included in the property name in parentheses, *e.g.*, “Smith Historic District (Additional Documentation and Boundary Increase).” (Figure 4, property name formatting recommendation for additional documentation, boundary increases, and/or boundary decreases.) Throughout the Registration Form, care should be taken to differentiate information for the boundary change area from information for the previously-listed area.

For a property with a boundary increase, in Section 5 “Classification,” it is helpful to create two tables for the resource count: one table to count and categorize resources—by property type and as contributing or non-contributing—for the increased area, and another to provide the resource count and category for the previously-listed area. This table should reflect the resource counts based on conditions at the time the new Registration Form is prepared. (Figure 5, tables showing resource counts within the original boundaries and in the boundary

Number of Resources within Property: ADDITIONAL DOCUMENTATION

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>81</u>	<u>14</u>	buildings
<u>1</u>	<u> </u>	sites
<u> </u>	<u>1</u>	structures
<u>5</u>	<u>3</u>	objects
<u>87</u>	<u>18</u>	Total

Number of Resources within Property: BOUNDARY INCREASE

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>6</u>	<u> </u>	buildings
<u> </u>	<u> </u>	sites
<u> </u>	<u> </u>	structures
<u> </u>	<u> </u>	objects
<u>6</u>	<u>0</u>	Total

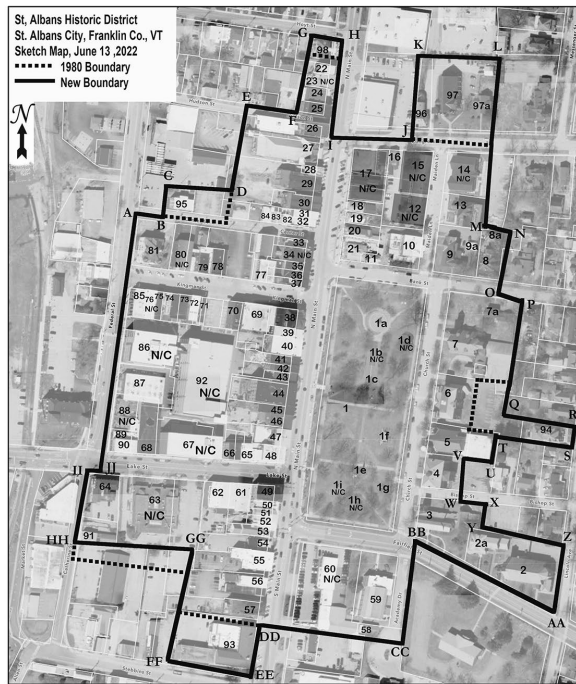
Number of contributing resources previously listed in the National Register 1

Figure 5. Tables showing resource counts within the original boundaries (top) and in the boundary increase area (bottom) for St. Albans Historic District, Vermont, NR. Ref. 100008758.

increase area.) For example, the additional documentation included in Section 7 “Narrative Description” and Section 8 “Statement of Significance” may add area(s) or period(s) of significance, as was done in the St. Albans Historic District Registration Form submitted in 2023 to update this historic district’s 1980 listing. This 2023 Registration Form supersedes the information in the 1980 listing and contains a new inventory with updated resource numbering and descriptions, as well as adjustments to the boundary to both add and remove properties from the original district. As provided in *National Register Bulletin 16A: How to Complete the National Register Registration Form*, at page 16, do not include in the tables any resources already individually listed in the National Register, but do enter on the line “Number of contributing resources previously listed in the National Register” any contributing resources already individually listed in the National Register. This includes National Historic Landmarks and historic units of the National Park System.

The Section 7 narrative description” and any inventories included in Section 7 should clearly differentiate resources in a boundary increase area from resources in the original nomination. Of course, resource counts in Section 7 should match those in Section 5 “Classification,” and the status of those resources—contributing or non-contributing—as shown on the accompanying sketch map should match the counts in both Sections 5 and 7.

Section 8 “Statement of Significance” should address the significance of the boundary change, explaining how it is related to the original listing and how it is a logical extension or reduction of that listing based on the criteria and area(s) of significance. For example, resources in a proposed boundary expansion might have the same historic associations as the original district, but were left out because they reflect a later period that was



Sections 9 to end page 116

Figure 6. Sketch map showing revised boundary for St. Albans Historic District, Vermont, NR. Ref. 100008758.

not considered significant when the original district was listed, *e.g.*, the 1980 boundary for the St. Alban’s Historic District was based on resources significant through 1932 and the 2023 Registration Form extends the period of significance through 1967.

The development of boundary change documentation is a good opportunity to evaluate whether the proposed boundary expansion might be better considered as separate property, *e.g.*, a new historic district rather than a continuation of the original listing.

The boundary reported in Section 10 “Geographical Data” for a combined action should describe the entire property and provide a justification for that boundary; however, as noted above, to assist the National Register in accurately recording data in its National Register Information System (NRIS), total acreage should be reported along with a breakout of “previously listed” and “increase” and/or “decrease” acreage. If part of the intent of the submission is to clarify (but not change) the boundary description or coordinates for the originally-listed property, that information should be provided separately and clearly identified as being for the original boundary.

Accompanying maps should clearly differentiate the original property boundary and the newly-added area(s). If an inventory of resources is provided in Section 7 “Narrative Description,” the map should be keyed to that inventory. (Figure 6, sketch map showing revised boundary.) In some cases, it is helpful to a reader to re-number and re-order all resources. For example, a historic district documented in a 1990 nomination may have had 100 resources, numbered sequentially from northwest to southeast; however, due to losses within the district—be it from a hurricane that destroyed a resource or a remodeling project that destroyed a resource’s historic integrity—or due to the addition of resources from the expansion of the district’s period of significance, renumbering the resources may make the sketch map more readily understandable, and relatable to an inventory in Section 7. Likewise, it is helpful to cross-reference new inventory numbers with the original inventory numbers.

[The National Register of Historic Places](#)

is the official list of buildings, structures, objects, sites, and districts significant in American history, architecture, archeology, engineering, and culture.

