

# NEIGHBORHOOD HISTORIC PRESERVATION COALITION

Advocating for measures that preserve our established neighborhoods and historic resources for future generations

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

Re: HRB Hearing Date: August 22, 2024

Dear Members of the City of San Diego Historical Resources Board:

We are writing to seek your assistance in addressing what has become a broken and non-functioning process for the designation and processing of historic districts. At this time there is effectively no local process for the designation of historic districts in the city of San Diego. The city is not processing any historic districts.

It should be of great concern to the Historical Resources Board (HRB) that the city has not processed a district designation since 2017. There are approximately 26 other districts awaiting action, some districts have been waiting as long as 50 years to be brought forward. During this time, historic resources have been lost or irreparably altered.

Local district designation matters. The public deserves and has the right to a reasonable and fair local process. It is essential for fostering community engagement and trust in historic preservation efforts. By addressing these concerns, the HRB can better fulfill its role and work collaboratively with the community.

We are asking for the board's help. We are asking for the HRB to restart the processing of historic districts. You have the power to instruct staff on what you want done, and you have the power to ensure they do not stonewall you—or, by extension, the public you serve.

We are requesting your direct actions to help get the process back on track.

We have included some of the issues and points in more detail for you here.

- The CLG program provides a comprehensive framework to empower local governments to protect and preserve their historic resources, fostering the creation of historic districts as a means to enhance community character and quality of life. By promoting the creation of historic districts, the CLG program helps communities stabilize property values, attract tourism, and enhance their cultural identity. These benefits are designed to provide the incentive for local governments to pursue historic district designations as part of their broader community development goals.
- These districts being brought forward were not created from whole cloth; they are districts that have been recommended by the historical resources staff for historic designation.
- Currently, there is effectively no process for historic district designation at the City of San Diego level.

When local processes are ineffective, turning to the state for historic designation becomes a necessary recourse. The State processes nominations in a timely manner, ensuring that important historic resources receive the protection they deserve. If a functioning process were in place, there would be no need for the public to bypass the city for historic designation. Local preservation advocates would prefer to participate in that process rather than incurring the additional effort and expense of the National Register.

- The community has been compelled to seek alternatives due to the city's inaction. Addressing these issues is essential to ensuring an efficient and effective designation process.
- Statements that the State Office of Historic Preservation (OHP) lacks a rigorous vetting process are simply untrue. OHP staff meticulously and stringently review all applications, ensuring only those that meet the high standards proceed. What may appear as blanket approvals is actually the result of a thorough and in-depth evaluation process. The notion that the OHP operates as a mere rubber stamp is categorically false. Board members should refrain from undermining this exemplary process, which serves as a model of efficiency and effectiveness.
- Lack of Department of Park and Recreation (DPR) hard copy forms does not mean a thorough review and analysis of individual properties has not been done. This is not an issue of rigor or scholarship. The National Register reports rely on citations to publicly accessible materials rather than printing out and appending those materials to the report. Just because the forms have not been forwarded to the board does not mean they do not exist. If requested, additional documentation can easily be forwarded to staff and the HRB for review and footnotes can be easily verified.
- Expedite district designations: The city needs to expedite the local designation of state and national historic districts and complete pending district designations, which have been stalled since 2017. Many of these designations have languished for decades without progress. For example, the City of San Diego has identified several potential historic districts through reconnaissance surveys, yet the designation process for many has not been completed, leaving them in limbo. The Golden Hill expansion district is one that exemplifies this neglect. These delays not only hinder the preservation of culturally and historically significant areas but also prevents communities from benefiting from the economic and social justice advantages that come with historic district recognition. We have case study evidence supporting this, underscoring the urgent need for action.
- Districts provide certainty: The failure to process district designations has led to significant chaos and uncertainty for developers, builders, the real estate industry, and homeowners. This backlog clogs the city's systems, costing millions of dollars in staff time and resources. Historic district designations provide much-needed certainty by stabilizing property values and encouraging sensitive development, which benefits the entire community. By addressing these delays, the city can enhance efficiency and foster a more predictable environment for all stakeholders involved.
- Social inequity: The tripling of application fees has exacerbated social inequity by making it nearly impossible for lower-income applicants to pursue historic designations. The city was supposed to find a way to reduce or eliminate fees for low-income neighborhoods and applicants. Staff was also supposed to

provide technical assistance to those applicants to prepare nominations. Initially, the public was assured that these increased fees would facilitate the hiring of more staff and expedite the processing of district applications. However, this promise remains unfulfilled. It may be prudent for the board to request an investigation by the Independent Budget Analyst (IBA) to examine this issue. Additionally, the city's failure to complete historic surveys in historically underserved communities is evident in the "Suspended Historic Context Statements and Survey," within the draft Barrio Logan/Logan Heights Survey which remains unfinished since the last survey was conducted in 1989. <https://www.sandiego.gov/planning/work/historic-preservation-planning/contexts>

- Mills Act: By reducing property taxes, the Mills Act makes it more affordable for owners to maintain their historic properties, thereby contributing to the preservation of San Diego's architectural heritage. This program is particularly significant as it provides a form of financial relief that supports affordable housing efforts by reducing the overall cost burden on property owners. This is the only program the city of San Diego has that makes homeownership more affordable.

Sincerely,



Bruce Coons  
Executive Director, Save Our Heritage Organisation  
On behalf of the Neighborhood Historic Preservation Coalition

cc: Kelly Stanco  
Suzanne Segur  
Bernie Turgeon  
San Diego City Council Members