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

February 26, 2025

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

Re: **HRB Hearing Date: February 27, 2025**
Item-4: Preservation and Progress Workshop

Dear Chair Hutter and Board Members:

These comments are in response to the Memorandum from Deputy Director Kelley Stanco dated February 21, 2025 regarding the above item. We strongly oppose several proposed updates and amendments that would weaken protections for San Diego's historic resources, including as follows:

- **Politicization of the Designation Process:** The proposed revisions to the historical resources designation process, which would allow *de novo* findings at City Council, would introduce political influence into what should be an objective decision-making process. City Council lacks the necessary expertise to make these determinations, which should remain with qualified professionals.
- **Stripping Protections from Historic Districts:** Proposed amendments that alter the automatic regulation of National and State-designated resources would remove protections from hundreds of contributors to historic districts, undermining years of preservation efforts.
- **Undermining Preservation Through "Mitigation":** Certain language suggests that "mitigation" or "commemoration" could replace actual preservation. These are not substitutes for meaningful historic resource protection.

Additionally, many of the proposed amendments are too vague to be meaningfully assessed:

- The phrase "*minor updates to the Historic Preservation Element*" provides no details on what these updates entail.
- Proposed changes to the City's Designation Criteria and Guidelines to "*examine eligibility thresholds/standards for clarity and consider possible revisions*" offer no specifics on what revisions are under consideration.

- The suggestion to “clarify that a building must be evaluated in a context appropriate to its type” is ambiguous and open to interpretation.

Furthermore, the interplay between proposed changes in *Package A* and *Package B* makes it problematic to consider them separately, especially with over a year between their review. For example, proposed changes to the Mills Act program (Package A) are directly related to adjustments in permit processes and incentives for preservation and adaptive reuse (Package B). These interconnected policies should be evaluated together to ensure a holistic and effective approach.

Finally, for months, we have requested that the City commission an economic study to assess the impacts of its historic regulations as part of this overhaul. Since City staff has ignored these requests private funding has been secured to commission an independent study by PlaceEconomics. This study will evaluate the benefits and impacts of existing regulations, including the Mills Act program and historic districts, with a focus on affordability and equity. The findings are expected within four to five months.

We strongly urge the city to delay any proposed updates or amendments until the results of this study can be reviewed and incorporated. Moving forward without this critical analysis risks weakening and denigrating many of the most important and beneficial aspects of the Preservation and Progress Initiative that provides significant public benefits.

Sincerely,

Mission Hills Heritage

A handwritten signature in blue ink that reads "Barry E. Hager". The signature is written in a cursive, flowing style.

By: Barry E. Hager,
Chair, Community Planning Committee