Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969

February 26, 2025

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Dear Kelley and Historic Resources Board,

SOHO Comments to Staff Memorandum for the Preservation and Progress Workshop for February 27, 2025.

Many of the proposed amendments are too vague to be responded to in detail. However, we offer the following comments based on the limited information provided, where possible:

General Comments
The number of individual site designations would be significantly lower if historic districts were properly processed, this would bring San Diego in line with other jurisdictions. The standard for individual designations is already much higher than that for district contributors. Given that San Diego is the second-largest city in California, it follows that we have the second-highest number of Mills Act agreements. We are open to exploring an alternative to conducting the 45-year review process. Conducting a citywide survey similar to SurveyLA and processing identified districts and individual nominations would provide certainty to all stakeholders and significantly streamline the process.

We Support:

- The development of educational materials on:
  - The benefits of preservation
  - Sustainable and resilient maintenance and improvement of historic properties
- Allowing the use of the Historic Preservation Fund to serve as a source of small grant funding for low-income and traditionally marginalized communities to evaluate and designate new resources or rehabilitate, restore, and improve designated resources.
- A more streamlined process for adaptive reuse of historic buildings, provided it is consistent with the U.S. Secretary of the Interior's Standards and does not pose a threat to public health and safety.
- Expanding incentives and improving design standards.
- Increasing penalties and enforcement of historic regulations
- Clear criteria should be established for Multiple Property Listings (MPL).

We oppose all proposed updates and amendments that would seek to weaken current protections fand incentives or San Diego's historic resources and potential historic resources including:

- Any proposals that would weaken existing protections for historic and potentially historic resources, such as

the creation of a de novo hearing of appeals before the City Council. These types of changes would require a full Environmental Impact Report (EIR) and substantial mitigation.
    - The current process was established by the City Council to prevent lengthy designation hearings and appeals. The determination of historic resources should remain with experts.
    - The supermajority vote of the HRB board requirement was established based on this procedure, along with the policy of no appeals for non-designations.
- Payment into the Preservation Fund for mitigation should not become a routine checklist option for developers.

Comprehensive Analysis: Independent Economic Study
SOHO and the Neighborhood Historic Preservation Coalition formally requested that Historic Resources commission a study by PlaceEconomics to comprehensively analyze how historic preservation impacts San Diego's affordable housing, equity, and climate goals to assess the impacts of historic regulations and to inform the proposed overhaul.

Since the City has not responded, the preservation community has secured private donations to fund this independent study from the preeminent, well-established research firm dedicated to thorough and robust analysis of the economic impacts of historic preservation. No institution has conducted more analyses of the economic impacts of historic preservation than PlaceEconomics, and Los Angeles, San Antonio, and Phoenix have all retained this firm for similar purposes.

This study will evaluate the benefits and impacts of existing regulations, including the Mills Act program and historic districts, with a particular focus on:
- Affordability
- Equity
- Climate concerns

All of these factors are highlighted in the city's Preservation and Progress initiative as critical issues.

The study's findings are expected in the next few months. In light of this, SOHO ask the City to pause any proposed updates or amendments until the results of this study can be reviewed and incorporated. Proceeding without this essential analysis would be a waste of City resources and risks undermining key aspects of the Heritage Preservation Program, which provides significant public benefits.

Additional inquiry: City Budget Concerns
What is the cost of this update program, given the City's current budget constraints? Historic preservation and development have not been in substantial conflict in recent years, raising further questions about the necessity of these changes at this time with no real benefit.

We have constructive recommendations for enhancements and look forward to a time when the City actively engages the community in a meaningful and collaborative discussion.

Thank you,

Bruce Coons
Executive Director