



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: February 21, 2025

TO: Historical Resources Board

FROM: Kelley Stanco, Deputy Director, City Planning Department

SUBJECT: Preservation and Progress Workshop

Background

Last year, the City Planning Department announced the launch of [Preservation and Progress](#), which is a comprehensive update to the City's Heritage Preservation Program that will streamline processes for new homes and other uses while protecting places of historic, architectural and cultural importance and encouraging their adaptive reuse. We launched the website, which included an overview of the goals and values of Preservation and Progress as well as an online portal where the public can submit ideas for consideration as part of the update.

Over the past two Historical Resources Board (HRB) meetings, City staff presented two information items that were intended to lay the groundwork for future discussion of updates to the various policy, regulatory and guidance documents that together make-up the City's Heritage Preservation program. This past November, we presented an informational item regarding the City's existing Heritage Preservation Program, the recording of which is [available online](#). The presentation provided a baseline of what the City's current Heritage Preservation program currently does and how it works. As a follow-up to that presentation, last month, we presented a benchmarking study completed by Heritage Preservation staff that compared the City's Heritage Preservation program to the preservation programs of the nine other largest jurisdictions in the country (San Diego being the eighth largest), as well as seven other cities in California with active preservation and Mills Act programs. A recording of that preservation is also [available online](#). The benchmarking study revealed that many aspects of the City of San Diego's Heritage Preservation program are inline with other jurisdictions. However, there were several areas where the City's program differed from most other jurisdictions, including:

- The number of individual site designations (1,476 at the time of benchmarking), which exceeded all other jurisdictions surveyed, and the number of locally designated historic districts (24 at the time of benchmarking), which was fewer than many of the jurisdictions surveyed. In jurisdictions with fewer individual resources, there is a higher standard required for designation, which is reflected in the level of individualization and elaboration of the individual resources. The focus in these

jurisdictions appears to be on identifying and designating historic districts and reserving landmark designation for more distinct or notable properties.

- HRB Criterion E. The City is the only jurisdiction (aside from the County of San Diego and the City of Coronado, which likely benchmarked from the City of San Diego's program) that has a designation criterion that provides for local listing of a resource listed on the National Register or State Register resource without having to evaluate that resource under the jurisdiction's other designation criteria.
- The City's "Over 45" review of all projects impacting a structure 45 years old or older to determine historic significance, which does not exist in any other surveyed jurisdiction. When this review process was created in 2000, the 45-year threshold included anything built prior to 1956. Currently, this review process requires review of all projects impacting properties built prior to 1981. As a result, Heritage Preservation staff reviews thousands of projects each year, the vast majority of which have no significance and are not eligible for designation. This creates uncertainty for applicants and is an inefficient use of City resources, with significant staff time spent reactively identifying what is not significant, rather than proactively identifying and designating what is significant, such as historic districts.
- The total number of Mills Act contracts, which is significantly larger than any other surveyed jurisdiction except for Los Angeles, and the lack of a competitive application process or limit on property value, which many other jurisdictions have.

These more notable differences are useful discussion points when considering possible updates to the Heritage Preservation program as part of Preservation and Progress.

Outline of Potential Updates Under Preservation and Progress

In addition to understanding how the City's Heritage Preservation program compares to the preservation programs of other jurisdictions, City staff has reviewed feedback and suggestions received through the [online portal](#) and via email, initiated conversations with the California Office of Historic Preservation (OHP) about Preservation and Progress and possible updates that could be included in the initiative, and tapped into our own collective knowledge and experiences as staff who have been implementing the City's Heritage Preservation program over the past 20+ years.

Utilizing all of this information, staff has developed an outline of potential updates to the City's Heritage Preservation program that further the goals of Preservation and Progress to advance equity in preservation, ensure the Mills Act program is equitable and fiscally responsible, identify and protect historical properties and districts, reform permit processes to better encourage adaptive reuse of buildings on their original site, adopt objective design standards for historic properties and districts, and remove regulations that unnecessarily impact properties that lack significance.

Staff has grouped the potential updates into Package A and Package B. These potential amendments, as well as their groupings into Package A and Package B, are preliminary, and staff welcomes ongoing feedback from the Board and the public on the potential reforms, as well as ongoing discussions of how we can best meet the goals of Preservation and Progress.

Package A, which staff is targeting for completion by the end of calendar year 2025, would include items that are not especially complex and that do not involve amendments to the Historical Resources Regulations or Historical Resources Guidelines, as any amendments need to be addressed more comprehensively. Items currently being considered to be included in Package A include:

- Develop educational materials on the benefits of preservation, how to maintain and improve historic properties in a sustainable and resilient manner, and how to incorporate new housing into historic properties.
- Minor updates to the Historic Preservation Element of the General Plan.
- Update the City's Mills Act program under Council Policy 700-46 to ensure equitable and fiscally sound implementation.
- Repurpose the Historic Preservation Fund to primarily serve as a source of small grant funding to low-income and traditionally marginalized communities to evaluate and designate new resources or rehabilitate/restore/improve designated resources.
- Consider updates to the historic designation appeal process that could include the addition of a de novo finding that would allow the City Council to reconsider the merits of the designation, as well as the ability to appeal when properties are not designated by the HRB.
- Amend the Complete Communities Housing Solutions regulations to clarify that thematic historic district boundaries are limited to the contributing resources.
- Allow for a more streamlined process for adaptive reuse of historic buildings where the adaptive reuse is consistent with the US Secretary of the Interior's Standards and would not pose a threat to public health and safety.

Package B, which staff is targeting for completion in the summer of 2026, would include updates that are more complex in nature, that include amendments to the Historical Resources Regulations and/or Historical Resources Guidelines, or that may require more extensive environmental analysis. Items currently being considered for Package B include:

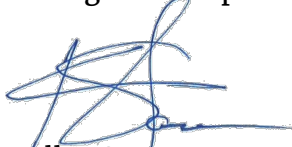
- Amendments to the 45 Year review (SDMC Section 143.0212) process to transition away from reactive individual property reviews and toward proactive preservation to protect truly important historical resources, including the formation of historic districts.
- Amendments to address automatic regulation and/or listing of National/State Register resources to align with other jurisdictions as well as National Park Service and California Office of Historic Preservation requirements.
- Amendments to the City's Designation Criteria and Guidelines to:
 - Examine eligibility thresholds/standards for clarity and consider possible revisions.

- Consider whether greater alignment with State or National Register criteria is desired.
- Better address eligibility and resource integrity for resources significant for social/cultural history and association with minority/underrepresented communities.
- Clarify that a building must be evaluated in a context appropriate to its type.
- A comprehensive update to the Historical Resources Guidelines of the Land Development Manual, including a mitigation framework to mitigate impacts to historic resources more effectively and in a manner that provides greater certainty and clarity for project applicants. City staff will also explore new mitigation strategies for impacts to historic resources, such as payment into the City's Historic Preservation Fund.
- Establish a commemorative designation program for sites that are no longer standing or that don't retain integrity required for designation but have importance to the community so that the importance of the site can be acknowledged and honored with minimal to no regulation.
- Create a Multiple Property Listing (MPL) framework to more efficiently evaluate and designate resources with shared significance, with less time and cost to the applicant.
- Develop objective design standards for improvements or additions to historic resources, especially the addition of ADU homes and small home development in historic districts and designated sites, as well as all improvements in historic districts.
- Adjust permit processes and incentive programs to streamline and incentivize preservation and reuse of historic resources, including:
 - Incentivize projects that retain resources on-site by reducing permit processing levels for on-site and temporary off-site relocations.
 - Expand development incentives for projects that propose development that is consistent with the U.S. Secretary of the Interior's Standards.
- Strengthen and clarify enforcement, penalties, and fines around demolition by neglect and unpermitted alteration of historic resources.
- Better address sustainability and the use of substitute materials, utilizing updated federal preservation guidance.

As stated previously, the potential amendments listed above, as well as their groupings into Package A and Package B, are preliminary. We value the feedback of the Board and the public on these items and issues, as well as other items that may not be included in the lists above and look forward to working together to update the City's Heritage Preservation program.

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We will share information and future draft documents on the Preservation and Progress website, hold public meetings and workshops including meetings with the Policy Subcommittee of the Board, receive input, and ultimately bring the packages through the public hearing process, which will include the Community Planners Committee, the Historical Resources Board, the Planning Commission, the Land Use and Housing Committee, and the City Council. As always, we welcome your ongoing feedback and input throughout the process.



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