



THE CITY OF SAN DIEGO

## Report to the Historical Resources Board

DATE ISSUED: May 9, 2024 REPORT NO. HRB 24-021

HEARING DATE: May 23, 2024

SUBJECT: **ITEM #1 – Hillcrest Focused Plan Amendment Historic Preservation Component**

APPLICANT: City of San Diego

LOCATION: Uptown Community Plan Area, Council District 3

DESCRIPTION: Review and consider for the purpose of making a recommendation to the City Council the final drafts of the Hillcrest Historic Context Statement; the Hillcrest Focused Plan Amendment portion of the Blueprint SD Cultural Resources Constraints and Sensitivity Analysis; the Uptown Community Plan's amended Historic Preservation Element; the Supplemental Development Regulations for the Hillcrest Historical District; and the Historical, Archaeological and Tribal Cultural Resources Sections of the Blueprint SD Initiative, Hillcrest FPA, and University CPU Program Environmental Impact Report as it relates to the Hillcrest Focused Plan Amendment.

### STAFF RECOMMENDATION

Recommend City Council adoption of the Hillcrest Historic Context Statement; the Hillcrest Focused Plan Amendment portion of the Blueprint SD Cultural Resources Constraints and Sensitivity Analysis; the Uptown Community Plan's amended Historic Preservation Element; the Supplemental Development Regulations for the Hillcrest Historical District; and the Historical, Archaeological and Tribal Cultural Resources Sections of the Blueprint SD Initiative, Hillcrest FPA, and University CPU Program Environmental Impact Report as it relates to the Hillcrest Focused Plan Amendment.

### BACKGROUND

The Hillcrest Focused Plan Amendment (Hillcrest FPA) area encompasses approximately 380 acres of the Hillcrest and Medical Complex neighborhoods within the Uptown Community. The Uptown Community Plan was last updated comprehensively in 2016 to reflect local needs and in accordance with the General Plan and Climate Action Plan. However, the Community Plan Update did not increase housing capacity, but rather maintained the residential densities established in the previous update of the Community Plan in 1988, as reflected in the existing planned land uses. Since then, with a growing housing crisis and a changing climate, more is needed to address housing costs, enhance access, use of transit, and provide public spaces for all to use. The Hillcrest Focused

Plan Amendment will address these needs and increase housing capacity, identify opportunities for public spaces, strengthen mobility connections, support local business, and celebrate the LGBTQ+ culture and history of the community focusing within the Hillcrest and Medical Complex areas of the community plan.

As part of the Hillcrest FPA, the City Planning Department contracted with Heritage Architecture and Planning and their sub-consultant, GPA, to prepare the Hillcrest LGBTQ+ Historic Context Statement and to intensively survey the potential Hillcrest Historic District that was identified during the 2016 Uptown Community Plan Update. This work supported the development of the amendments to the Uptown Historic Preservation Element, the development of Supplemental Development Regulations to preserve the Hillcrest Historic District while accommodating development of new homes, and the Cultural Resources Section of the Program Environmental Impact Report (PEIR). The City Planning Department prepared a single PEIR for three distinct initiatives aimed at increasing housing supply and affordability in accordance with the City's fair housing and climate goals – Blueprint San Diego, which is a refresh to the City's General Plan (but does not include amendments to the Historic Preservation Element of the General Plan), the Hillcrest FPA, and the University Community Plan Update. RECON Environmental was contracted to prepare the Blueprint SD Initiative, Hillcrest FPA and University CPU PEIR, and Helix Environmental Planning prepared the Cultural Resources Constraints Analysis for Blueprint SD, which included a minor update to the information provided in the 2016 Uptown CPU Prehistoric Cultural Resources Report.

## ANALYSIS

### **Cultural Resources Constraints and Sensitivity Analysis**

As part of the 2016 Uptown Community Plan Update, a [Prehistoric Cultural Resources Report](#) was prepared by AECOM. The Cultural Resources Report, which was reviewed by the HRB in 2016 as part of the Uptown CPU, provides a constraints analysis and cultural resources sensitivity analysis for prehistoric resources within the Uptown Community. As part of the Hillcrest FPA, additional work was undertaken to identify any new sites recorded within the Hillcrest FPA boundary since 2016 and a minor update to the resource sensitivity levels within the Hillcrest FPA boundary to reflect new information. Specifically, two sites that were previously low sensitivity were increased to moderate and high sensitivity based on the updated information. Given the minor nature of the updated information, it was incorporated into the Cultural Resources Constraints and Sensitivity Analysis for the Blueprint SD initiative as a subsection. The excerpt of the Blueprint SD Cultural Resources Constraints and Sensitivity Analysis related to the Hillcrest FPA is provided as Attachment 1.

The Native American Heritage Commission (NAHC) was contacted on June 13, 2023, for a Sacred Lands File search and a list of Native American contacts for the Blueprint SD study area, which includes the Hillcrest FPA. On June 29, 2023, the NAHC responded with a positive result to the Sacred Lands File search, in addition to providing a list of Native American tribes who may have knowledge of the cultural resources within the Blueprint San Diego Program area. The City subsequently began conducting the regulatory consultations under AB-52 and SB-18. The City notified the tribal contacts provided by the NAHC on multiple occasions to ensure outreach wasn't overlooked. The City Planning Department did not receive any specific requests for consultation on the Hillcrest FPA under either AB-52 or SB18, but the Department continues to engage with the tribal representatives to provide information and receive input.

## **Hillcrest LGBTQ+ Historic Context Statement**

As part of the Hillcrest FPA, the City is expanding its existing documentation on LGBTQ+ history in Hillcrest, including the preparation of the Hillcrest LGBTQ+ Historic Context Statement developed by GPA. The Historic Context Statement focuses specifically on Hillcrest and LGBTQ+ history in the neighborhood and provides a framework for the identification, evaluation, and designation of built historic resources.

The Hillcrest LGBTQ+ Historic Context Statement builds upon the San Diego Citywide LGBTQ+ Historic Context Statement (Citywide HCS), completed in 2016. It is tailored to the Hillcrest area and City of San Diego Register of Historical Resources criteria. It includes a historical overview of Hillcrest prior to 1970 for background and an examination of its transition to San Diego's primary LGBTQ+ neighborhood from 1970 to 1990. The overview is followed by a series of focused themes that discuss specific property types or subjects in Hillcrest in more detail. Additional historical context and information about the LGBTQ+ community in San Diego at large can be found in the 2016 Citywide HCS.

The themes in the Citywide HCS have been carried over into the focused Hillcrest LGBTQ+ Historic Context Statement, apart from the Religion theme, which is not represented by any known extant built resources in Hillcrest, and the Political Activism theme, which has been incorporated into the Community Organizations theme based on the histories of the related extant resources in Hillcrest. One new theme, LGBTQ+ Business and Commerce, has been added to the Hillcrest LGBTQ+ Historic Context to address the role of Hillcrest as a business district and the importance of businesses in drawing and anchoring the LGBTQ+ community in the area. The period of study for the Hillcrest LGBTQ+ Historic Context Statement ends in 1990. Although the City does not have an age threshold for potentially eligible historical resources, events occurring within the last 25 to 30 years are considered very recent within the broad scope of history. As historical perspective and understanding are still developing, detailed themes and evaluation criteria for resources with LGBTQ+ associations after 1990 were not included in the context. The context was used in the preparation of the Hillcrest Historic District Nomination and will be used to identify future individually significant resources, including through a future Multiple Property Listing.

## **Hillcrest Historic District Supplemental Development Regulations**

As part of the Hillcrest FPA initiative, the Heritage Preservation team has implemented a historic preservation strategy that includes intensively surveying the potential Hillcrest Historic District that was identified during the 2016 Uptown Community Plan Update Process. The preservation strategy also includes the preparation of design regulations for the district that would protect the essential historic features and characteristics of the district while providing a clear and by-right approval process for improvement of the business district and the development of new homes.

The City Planning Department contracted with Heritage Architecture and Planning to conduct the intensive level survey work. They concluded that a smaller area generally centered around 5<sup>th</sup> Avenue between University Avenue and Robinson Avenue is eligible under HRB Criteria A and C. The Hillcrest Historic District Nomination has been reviewed by the Policy Subcommittee of the HRB but has not yet proceeded to the full Board for review and processing, pending outreach and

engagement with property owners and tenants within the district boundary. Regardless of the future designation action, the conclusion of the intensive level survey effort that the Hillcrest Historic District is eligible for designation to the City's Register of Historical Resources necessitates looking at ways to reduce impacts to historical resources. In the furtherance of both the protection of the Hillcrest Historic District and the provision of a clear and by-right approval process for the improvement of the business district and the development of new homes, Supplemental Development Regulations (SDRs) have been developed that would preserve the essential historic features of the district (Attachment 4).

In identifying what the essential historic features are, it was noted that the commercial district was developed historically with buildings set on the front, side, and often rear property lines. This resulted in side and rear facades being completely utilitarian and non-descript. The storefronts, which are set at the front property line adjacent to the sidewalk are typically one-to-two stories in height. To maintain the historic storefronts and pedestrian scale along the street, the SDRs require the preservation of the storefronts of contributing resources. Non-contributing resources may be demolished, but new construction must maintain a zero-foot front setback and a storefront façade height of 30-feet to maintain the pedestrian scale and character. New development on both contributing and non-contributing resources must be setback 20-feet from 4<sup>th</sup> and 5<sup>th</sup> Avenues and 10-feet from University and Robinson Avenues and is limited to 100-feet in height. Balconies may be permitted to encroach into the setback. Projects that comply with the SDRs can be considered a minor project under the Historical Resources Regulations and processed without a Site Development Permit. These SDRs will ensure that the historic storefronts and pedestrian scale that characterizes the district are preserved, and that new development is accommodated in a manner that protects the pedestrian scale of the district.

It is currently anticipated that the Hillcrest Historic District will come to the HRB for designation in late summer/early fall 2024. Although not a part of this action, the Hillcrest Historic District Nomination is linked in Attachment 5 for reference. The contributing and non-contributing resources can be viewed on [CHRID](#), the City's online database of historic resources. Resources within the proposed district can be easily viewed by selecting "Hillcrest Historic District" in the "District" drop-down menu in the "Search by Property" section at the top of the page, and then clicking on "Search Property." The SDRs are proposed to be implemented as part of the Hillcrest FPA regardless of whether or not the Hillcrest Historic District is ultimately designated at the conclusion of the historic district nomination process. If the district is designated, the SDRs will apply to contributing and non-contributing resources as designated by the HRB and the City Council if a designation appealed and upheld. If the district is not designated, the SDRs will apply to contributing and non-contributing resources as identified in the Hillcrest Historic District Nomination.

### **Historic Preservation Element**

The General Plan intends that historical and cultural resources be integrated into the larger land use planning process and that historic preservation concepts and identification of historical resources in the community are part of the community plan update process. The 2016 Uptown CPU included a new Historic Preservation Element (HPE) that focuses on the issue areas and policies that are unique to the needs of the Uptown community and provides a brief overview of information provided in the 2016 Historic Context Statement and Reconnaissance Survey Report. As part of the Hillcrest FPA, the Uptown HPE is being amended to update information regarding designated

historic sites and districts, move the tables and maps of designated and potential historical resources to the appendices to streamline the element itself consistent with all recent CPUs and HPEs, and minor updates to section and page numbering. The vast majority of the element and its policies remain unchanged.

### **Environmental Analysis of Historical, Cultural, Archaeological, and Tribal Cultural Resources**

As stated previously, the Blueprint SD Initiative, Hillcrest FPA and University CPU PEIR provided as Attachment 6 covers three separate planning initiatives – the General Plan refresh effort known as Blueprint SD, the Hillcrest Focused Plan Amendment to the Uptown Community Plan, and the University Community Plan and Local Coastal Plan Update.

The PEIR includes an analysis of potentially significant impacts to historical resources (prehistoric, historic archaeological, tribal cultural and built environment historic resources), which is detailed in Section 4.4, Cultural Resources and Section 4.15, Tribal Cultural Resources. Each section addresses impacts related to Blueprint SD, the Hillcrest FPA, and the University CPU. Although the Hillcrest FPA and associated discretionary actions do not propose site-specific development, future development allowable under the FPA could result in the alteration of historical resources at a project-level. A mitigation framework is provided in the PEIR to address this issue. All development projects with the potential to affect historical resources, such as designated historical resources, historical buildings, districts, landscapes, objects, and structures, important archaeological sites, Tribal Cultural Resources, and traditional cultural properties are subject to site-specific review in accordance with the Historical Resources Regulations and the Historical Resources Guidelines of the Land Development Manual. Further, a specific mitigation measure (MM-HIST-1) would be required of all development projects that could directly affect historic resources and another measure (MM-HIST 2) for archaeological and tribal cultural resources.

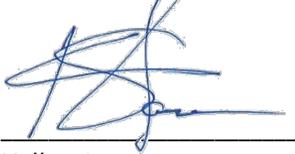
While the SDMC regulations provide for the regulation and protection of designated and potential historical resources, and the Uptown Historic Preservation Element policies call for further evaluation of un-surveyed areas and properties, and PEIR mitigation measures provide mitigation for historic, archaeological and tribal cultural resources, it is not possible to ensure the successful preservation of all historic built environment resources within the CPU at a programmatic level. Therefore, the PEIR concludes that potential impacts to historical resources from implementation of the community plan would remain significant and unavoidable.

Public comment letters were received by the Save Our Heritage Organisation (SOHO) and Sharon Gehl and are provided as Attachment 7. Many of the comments provided by SOHO speak to the LGBTQ+ Cultural District, which is not part of the historic preservation component of the Hillcrest FPA. Other comments suggest changes to the SDR requirements, which staff does not believe are required to protect the significant historic features and character of the district. No changes to the historic preservation components of the Hillcrest FPA are anticipated in response to the public comment letters.

### **CONCLUSION**

Staff recommends that the Historical Resources Board recommend to the City Council adoption of the Hillcrest Historic Context Statement; the Hillcrest Focused Plan Amendment portion of the

Blueprint SD Cultural Resources Constraints and Sensitivity Analysis; the Uptown Community Plan's amended Historic Preservation Element; the Supplemental Development Regulations for the Hillcrest Historical District; and the Historical, Archaeological and Tribal Cultural Resources Sections of the Blueprint SD Initiative, Hillcrest FPA, and University CPU Program Environmental Impact Report as it relates to the Hillcrest Focused Plan Amendment.



Kelley Stanco  
Deputy Director

KS/ks

Attachments:

1. Excerpt of the Cultural Resources Constraints and Sensitivity Analysis for the Blueprint SD Initiative addressing the Hillcrest FPA
2. [Draft Hillcrest LGBTQ+ Historic Context Statement](#) (*link only*)
3. Proposed Amendments to the Uptown Historic Preservation Element (*under separate cover and will be distributed and linked [on the City's website](#) under the Staff Report on May 16, 2024*)
4. Hillcrest Historic District Supplemental Development Regulations (*under separate cover and will be distributed and linked on the City's website under the Staff Report on May 16, 2024*)
5. [Draft Hillcrest Historic District Nomination](#) (*link only*)
6. Draft Blueprint SD Initiative, Hillcrest FPA and University CPU Program Environmental Impact Report (PEIR) Section 4.4, Cultural Resources ([PEIR page 4.4-1](#), PDF document page 284) and Section 4.15 Tribal Cultural Resources ([PEIR Page 4.15-1](#), PDR document page 671) (*links only*)
7. Public comment letters received on the PEIR related to the Hillcrest FPA and historical, cultural, archaeological, and Tribal Cultural resources.



**Table 7**  
**RECORDED PREHISTORIC RESOURCES WITHIN THE UNIVERSITY COMMUNITY PLAN UPDATE AREA**

Resource Classification	Count	Percent
Artifact Scatter	99	49.01%
Isolated Artifacts	56	27.72%
Occupation Sites	22	10.89%
Midden Sites	11	5.44%
Hearths	8	3.96%
Quarry	5	2.47%
Bedrock Milling Feature with Artifacts	1	0.49%
<b>Total</b>	<b>202*</b>	<b>100%</b>

\* Includes Multi-Component Resources.

A total of 62 historic resources and historic components (46 recordations) of multi-component sites (16 recordations) are recorded within the UCPU area (Table 8, *Recorded Historic Resources within the University Community Plan Update Area*). These include 19 artifact scatters and refuse deposits, 12 isolated artifacts, and 8 buildings. Other less common resources within the area include structural remains, water conveyance features, and military properties or sites. Glass artifacts and historic cans are the most common artifact type – again, this is reflective of the City as a whole.

**Table 8**  
**RECORDED HISTORIC RESOURCES WITHIN THE UNIVERSITY COMMUNITY PLAN UPDATE AREA**

Resource Classification	Count	Percent
Artifact Scatter	19	30.64%
Isolated Artifacts	12	19.35%
Building	8	12.90%
Bridge	4	6.45%
Structural Remains	3	4.84%
Refuse Deposit and Dumpsite	2	3.22%
Military Property and Sites	2	3.22%
Dams, Water Conveyance Features, and Wells	2	3.22%
Road/Trail	1	1.61%
Structures	1	1.61%
Homestead/Ranch	1	1.61%
Railroad	1	1.61%
Wall	1	1.61%
Monument/Marker/Sign	1	1.61%
Orchard/Grove	1	1.61%
Park	1	1.61%
Post	1	1.61%
Mine	1	1.61%
<b>Total</b>	<b>62*</b>	<b>100%</b>

\* Includes Multi-Component Resources.

### Hillcrest Focused Plan Amendment Area

The Hillcrest FPA area is within the Uptown Community Plan area. The Uptown Community Plan was comprehensively updated in 2016, and a record search for the Uptown Community Plan Update was performed in 2009.. A total of 53 historical resources were identified in the Hillcrest Focused Plan

Amendment study area, these include 36 buildings, 13 sidewalk stamps, 2 refuse deposits, a bridge and a road (Table 9, *Recorded Historic Resources within the Hillcrest Focused Plan Amendment Area*).

**Table 9  
RECORDED CULTURAL RESOURCES WITHIN THE HILLCREST FOCUSED PLAN AMENDMENT AREA**

Resource Classification	Count	Percentage
Building	36	67.92%
Sidewalk Stamp	13	24.53%
Refuse Deposit	2	3.77%
Bridge	1	1.89%
Road	1	1.89%
<b>Total</b>	<b>53</b>	<b>100.00%</b>

### 3.2 NATIVE AMERICAN CONTACT PROGRAM

The 12 Community Plans listed in Section 4.0, below, were subject to both Assembly Bill (AB) 52 consultation and Senate Bill (SB) 18 noticing prior to the adoption of each of the plans. The comments received by the Native American tribes interested in consultation were considered in the production of the citywide sensitivity map created for the Blueprint San Diego Program.

The Native American Heritage Commission (NAHC) was contacted on June 13, 2023, for a Sacred Lands File search and a list of Native American contacts for the study area. On June 29, 2023, the NAHC responded with a positive result to the Sacred Lands File search, in addition to providing a list of Native American tribes who may have knowledge of the cultural resources within the Blueprint San Diego Program area. Native American correspondence is included as Appendix C (Confidential Appendices, bound separately).

Tribal consultation in accordance with SB 18 was initiated by the City of San Diego on July 2021 for the Blueprint SD project which specified the UCPU and the Hillcrest FPA. The City received responses from two tribes. On July 23, 2021, Ray Teran from the Viejas Band of Kumeyaay Indians provided comments on the project. On August 13, 2021, Dennen Pelton from the Rincon Band of Luiseno Indians provided a response to the notice. Additional notices will be sent 45 and 10 days prior to the City Council hearing on the project.

On November 3, 2023 the City of San Diego delivered tribal consultation notices in accordance with AB-52, one request for consultation was received from the San Pasqual Band of Mission Indians.

## 4.0 CULTURAL SENSITIVITY ANALYSIS

There are 52 community planning areas within the boundaries of the City, each of which has its own Community Plan (Figure 7). Many of the community planning areas have recently undergone, or are in the process of updating their Community Plan and, as such, have existing cultural resources sensitivity analyses contained within the cultural resources reports prepared in support of the Community Plan Updates (CPUs). These existing sensitivity datasets have been incorporated into the cultural sensitivity analysis for this study, and include data from the following community planning areas:

- Clairemont Mesa (HELIX 2020 [Wilson and Cooley 2020])

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] RE: Hillcrest Focused Plan Amendment Draft March 2024  
**Date:** Tuesday, April 30, 2024 9:24:37 AM  
**Attachments:** [HillcrestFocusedPlanAmendmentSOHOComments42924.pdf](#)

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**From:** Save Our Heritage Organisation <[sohosandiego@aol.com](mailto:sohosandiego@aol.com)>  
**Sent:** Monday, April 29, 2024 4:16 PM  
**To:** Mulderig, Shannon <[SLMulderig@sandiego.gov](mailto:SLMulderig@sandiego.gov)>; [PLN\\_PlanningCEQA@planningceqa@sandiego.gov](mailto:PLN_PlanningCEQA@planningceqa@sandiego.gov)  
**Subject:** [EXTERNAL] RE: Hillcrest Focused Plan Amendment Draft March 2024

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Good afternoon, Shannon,

Please see SOHO's comments for the Hillcrest Focused Plan Amendment, attached here.

Thank you,

Dean Glass  
Administrative Manager  
Save Our Heritage Organisation (SOHO)  
Office: 3525 Seventh Avenue • San Diego, CA 92103  
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# Save Our Heritage Organisation

*Protecting San Diego's architectural and cultural heritage since 1969*

April 29, 2024

Shannon Mulderig  
Senior Planner  
City Planning Department  
City of San Diego

RE: Hillcrest Focused Plan Amendment Draft March 2024

Dear Ms. Mulderig,

Save Our Heritage Organisation (SOHO) appreciates the opportunity to offer feedback on the March 2024 Hillcrest Focused Plan Amendment Draft, particularly regarding Chapter 5: LGBTQ+ Cultural and Chapter 11: Historic Preservation.

We reiterate concerns previously submitted by SOHO and the San Diego LGBTQ Historic Sites Project group, some of which do not appear to have been incorporated into the revised March 2024 Draft. Chapter 5 lacks specific language emphasizing the importance of identifying designated and potential LGBTQ+ historic sites. Although Chapter 6 addresses this, Chapter 5 should also contain such statements to establish a connection between culture and history.

The LGBTQ+ Cultural District should prioritize preserving, maintaining, and promoting local LGBTQ+ history alongside cultural components. Designated historic LGBTQ+ sites must be preserved and incorporated into any new development, as they serve as anchors linking past, present, and future.

Key objectives of the LGBTQ+ Cultural District should acknowledge the significance of social service agencies and community-based organizations, in addition to entertainment and commercial establishments. Recommendations include adding photos and accurately reflecting historically designated sites on maps. Community outreach should encompass Trans, API, Black, BIPOC, and Indigenous communities, ensuring their voices are heard and their history preserved.

Interpretive elements should avoid superficial treatments and instead highlight genuine LGBTQ+ cultural and historic sites. These elements should be integrated with a strong financial-backed maintenance program to prevent deterioration.

The walking corridor and site list should incorporate additional historically significant locations, such as:

- # 9 Albert Bell's Residence at 3780-3786 Fifth Avenue should use the official historic designated name: The Center/Gayzette/Albert Bell Building. The San Diego AIDS Project was located at 3777 Fourth Avenue (across the alley from # 9 and should be identified).

- The AIDS epidemic in the 1980s established AIDS services at Vauclain Point at the north edge of Front Street (the former site of a SD County facility and later the SD Hospice). That area along with #16 UCSD Owen Clinic has a long history related to AIDS and Hillcrest.
- The Obelisk Bookstore at 1037 University was a landmark bookstore for the LGBTQ+ community.
- The SAGE of California Center at 3138 Fifth Avenue was an important location and drop-in center for lesbians and gay men when it opened in 1999.
- Albert Bell's final residence at 3815 Vermont Street should be located on the map.
- Contact Lambda Archives for the location of an electrolysis business on University Avenue that served the Trans community.

Policy recommendations include incorporating the stories of marginalized LGBTQ+ communities and explicitly stating the preservation of designated historic LGBTQ+ sites and the identification of potential sites as essential components.

Chapter 6 should accurately reflect designated LGBTQ+ historic sites and work collaboratively with Chapter 5 to preserve and designate LGBTQ+ historic sites.

We do not believe that development by right of historic facades with a 10' set back should be allowed without further review for contributors to the historic district. Each Historic site may have unique character defining elements and history, which may require different treatments to ensure adequate preservation of these features. This street setback should be 12' minimum.

Setbacks for towers above 75 ft should be set back 50 feet from the Street. This is what is allowed along "J" street in the ballpark district downtown and it has maintained light and air and allowed a vibrant pedestrian orientated environment. While allowing dense towers appropriate to a modern downtown central business and residential district.

Thank you for reviewing our feedback. Preserving Hillcrest's LGBTQ+ history is crucial for embracing its past, present, and future identity.

Sincerely,



Bruce Coons  
Executive Director  
Save Our Heritage Organisation (SOHO)

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] comments on the Hillcrest Focused Plan Amendment draft EIR  
**Date:** Tuesday, April 30, 2024 9:30:10 AM  
**Attachments:** [Plan Hillcrest Comments, April 2024.docx](#)

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**From:** slgehl2000@gmail.com <slgehl2000@gmail.com>  
**Sent:** Monday, April 29, 2024 10:20 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] comments on the Hillcrest Focused Plan Amendment draft EIR

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Attached are my comments on the Hillcrest Focused Plan Amendment draft EIR.  
Sharon Gehl

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## Comments on the Hillcrest Focused Plan Amendment March 2024 draft to the Uptown Community Plan

Sharon Gehl [slgehl2000@gmail.com](mailto:slgehl2000@gmail.com)

The proposed Plan Hillcrest LGBTQ+ Cultural District would be the most effective way of supporting the *City of San Diego's Strategic Plan* objective of "Celebrating the cultural diversity and history of the LGBTQ+ community".

The Cultural District will use effective ways of communicating ideas such as words, written and spoken, pictures and color. It would also include a walking corridor that would link cultural interpretive elements and facilitate walking tours, another effective way to communicate ideas.

Identifying and preserving historic resources and districts on the other hand has proven to not only be ineffective in communicating cultural ideas in San Diego; it has done damage to the city by preventing much needed new multifamily housing, lowering property values, and hurting the city's tax base.

Society tends to pay for the things that we find work. Most of us learned the main points of history in school, from reading a book or newspaper, or from watching things like a Ken Burns documentary. While we pay teachers, writers, and producers, all City of San Diego, San Diego County, and California state historic buildings lose money; because most people are not interested in spending money on them. Why does the new Hillcrest Plan Amendment propose designating more buildings when people aren't interested in the ones we already have? What is going on?

The key to understanding Historic Preservation is this Wikipedia entry on the subject. [https://en.wikipedia.org/wiki/Historic\\_preservation](https://en.wikipedia.org/wiki/Historic_preservation) Wikipedia defines Historic Preservation as a "philosophical concept". The concept/theory was that turning buildings into museums would be a good way to tell history. This theory has been tested in the US for over a hundred years. It was soon evident that it was wrong, that turning buildings into museums is not an effective or popular way to tell history. If you had a restaurant that didn't have enough customers, it would go out of business; but professional preservationists asked for donations big and small, for volunteers to work for free, and taxpayer money to bail their museums out.

The fact that historically designated buildings are not financially viable became a continuing problem. It was still difficult for professional preservationists to make money. Then about 50 years ago preservationists found that they could make money by getting laws passed that allowed them to get control of other people's property - without having to compensate the owners financially.

As the chart below from the Wikipedia entry shows, now the majority of jobs in US historic preservation are not in Museums, 9%; but in Regulatory Compliance, 70%. In other words,

managing the laws and regulations that control officially designated or proposed historic properties. The more properties the City of San Diego Historic Resources Board (HRB) designates, either by force of law or because owners want big Mills Act tax subsidies, the more money professional preservationists in San Diego make. Adding more and more proposed properties to community plans is also a way for professional preservationists to make more money.

**Areas of professional, paid practice in historic preservation in the United States<sup>[6]</sup>**

Area of practice	! Percent (out of 100%)
Regulatory compliance (federal, state, and local)	69.7%
Architecture and construction	11.2%
Historic sites/museums	8.9%
Preservation advocacy	5.7%
Downtown revitalization	4.5%

Appendix E of the Uptown Community Plan lists over 525 Individually and District Designated properties, 17 Potential Historic Districts with some 2678 properties, 4 potential Multi-property Districts with some 953 properties, and 44 Potential Individually Listed properties. If the city already has over 500 designed properties that lower the city’s tax base and the majority of people ignore, why do we need another 3,500 to tell history?

The problem is that the City of San Diego’s historic preservation program is not actually about telling history, supporting the city’s climate action plan, or social equity; it’s about using laws to allow professional preservationists to get control of as much property as possible. The proof is the extremely boring DRAFT Hillcrest Focused Plan Amendment LGBTQ+ Historic Context Statement. LGBTQ+ history is actually quite interesting, but that Context Statement isn’t about telling history, it’s about establishing a legal basis for getting control of property that will hold up in court if the city is sued.

To summarize, the majority of Americans do not find historical preservation a good way to learn about history, it is therefore not financially viable; which makes it difficult for professional preservationists to make money. They solved their problem by getting laws passed. Now the overwhelming majority of them make money from taxpayer subsidies and government laws that give them control of other people’s properties without paying for them, not from using buildings to tell history.

Buildings are particularly bad at telling cultural history, even if that was actually the city's intent. Buildings are just objects that say nothing. They need verbal, written, and/or visual explanations; which are more effective and less expensive than the building itself. The solution is to take all of the proposed historic properties and districts out of the Uptown and Hillcrest Focused Plan Amendment. The proposed Cultural District can talk about culture and history more effectively and for less money than designating buildings. A Cultural District can also evolve over time to keep up with changing needs and new LGBTQ+ history.

Do what is best for the majority of people in San Diego, not what is best for a handful of preservationists. Support the City's climate action goals, it's housing needs, and social equity.