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

May 22, 2024

Historical Resources Board
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101
c/o Suzanne Segur, HRB Liaison
Email: ssegur@sandiego.gov

Re: HRB Hearing Date: May 23, 2024
Item #1 – Hillcrest Focused Plan Amendment Historic Preservation Component

Dear Chair Hutter and Board Members:

Mission Hills Heritage urges the HRB to NOT recommend adoption of the Supplemental Development Regulations (SDRs).

The proposed SDRs for the proposed Hillcrest Historic District create a set of blanket rules applicable to every building within the district. So long as a proposed project meets the basic threshold standards of the SDRs, no review for a site development permit is required even if the building is a contributing historic resource. In fact, it is unclear from the SDR in what context a site development permit would be required. Notably absent from the Staff Report is any analysis of how the SDRs are consistent with current law, including the Secretary of the Interior Standards for the Treatment of Historic Properties, and whether and how the SDRs could affect historic properties.

MHH objects to the SDRs in their entirety. First, historic buildings and the proposed projects affecting them should be considered on a building-by-building basis, as no building is exactly the same, consistent with the application of the Secretary of the Interior Standards, which are to be applied to "each project." Title 36 CFR Section 68.3. The creation of a blanket rule, allowing

modifications by-right, for this historic business district puts our historic resources at risk of loss and sets a dangerous precedent for other historic districts facing development pressures.

Secondarily, the SDRs only require a 10-foot step back on Robinson and University Avenues and a 20-foot step back on Fourth and Fifth Avenues for new additions. These minimal step backs are likely to destroy historic spatial relationships and historical integrity, contrary to Title 36 CFR Section 68.3(b)(9), and this standard likewise sets a threatening precedent for other historic districts. If the HRB recommends adoption of the SDRs, it should recommend adoption subject to amendment of SDR-C.4(2) to increase the step backs. Specifically, on 4th, 5th, and University Avenues, a 20-foot step back should be required for development up to 75 feet and a 50-foot step back for development 75 feet and above.

Sincerely,

Mission Hills Heritage

A handwritten signature in blue ink that reads "Kirk Burgamy". The signature is written in a cursive, flowing style with a large initial "K".

Kirk Burgamy, President