

San Diego LGBTQ Historic Sites Project

May 27, 2024

Planning Commission
1222 First Avenue
MS 501 San Diego, CA 92101

**RE: May 30, 2024 Item 4: Hillcrest Focused Plan Amendment
Chapter 5: LGBTQ+ Cultural and Chapter 11: Historic Preservation**

Chairperson Modén, Vice-Chairperson Boomhower, Commission Members Miyahara, Mahzari, Otsuji and Malbrough,

The San Diego LGBTQ Historic Sites Project (The Project) welcomes this opportunity to offer its comments to the Hillcrest Focused Plan Amendment regarding Chapter 5: LGBTQ+ Culture and Chapter 11: Historic Preservation components.

The idea of an LGBTQ+ Cultural District (Chapter 5) is a welcome component to the Uptown Plan. However a cultural component should not overshadow specifically designated LGBTQ+ historic sites and potential LGBTQ+ historic sites in the Hillcrest/Uptown Plan area. Designated and potential designated historic sites can be the linkages and the glue that ties past to present to future and form the anchors and threads of interpretive elements that link memory and progress as a cultural district develops over time. By emphasizing signage, interpretative element, colors and graphics, the Cultural District appears to be engaging in “rainbow washing”.

There is no specific language in Chapter 5 that emphasizes the importance of identifying designated historic LGBTQ+ sites (only one) and potentially significant historic LGBTQ+ sites (many). They appear to be identified in Chapter 11: Historic Preservation but a statement must be included in Chapter 5. (Contained in Chapter 11 but should also duplicated in Chapter 5).

The LGBTQ+ Cultural District must have as a goal the preservation, maintenance and promotion of local LGBTQ+ history. Preserving historical assets such as places, buildings, traditions, events, etc. can be found in other cities LGBTQ+ cultural districts. The same should be true for Hillcrest and San Diego.

We concur with the comments received by staff for adding policy support for the adaptive reuse of historically designated LGBTQ+ sites within the LGBTQ+ Cultural District to link the past to the future.

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The San Diego LGBTQ Historic Sites Project disagrees with the staff report in this section.

4. Historic Preservation and Cultural Heritage Strategy

The Hillcrest Historic Preservation and Cultural Heritage Strategy complements the LGBTQ+ Cultural District. While cultural districts can co-exist with historic districts, they are not one and the same and serve different purposes. A historic district acknowledges and protects a specified area with a concentration of buildings and sites that collectively embody a significant aspect of the City's history. A cultural district is not defined by historic significance, but rather is a tool for place-making and place-keeping that honors the presence and contributions of cultural groups while providing support to legacy businesses, nonprofits, community arts, and traditions.

While agreeing with the complementary relationship, LGBTQ places, as well as designated and potentially designated historic sites and buildings do create the guideposts of a cultural district for without those places and buildings, the LGBTQ community would not have persevered and developed into the community the City acknowledges through this plan amendment. As a previously unrecognized community similar to the Latin, Black and Asian communities a cultural district can highlight progress and social and political activism as well as the struggles these communities had to face to begin to achieve the benefits of equal rights.

This concept recognizing the importance of historic sites, places and buildings is spoken of and somewhat reinforced in:

5. LGBTQ+ Cultural Strategy

The draft plan includes an LGBTQ+ Culture element that outlines an LGBTQ+ Cultural District to formally recognize the Hillcrest area for its history, people, events, and culture. Through a thoughtful blend of cultural elements, public spaces, and community initiatives, the LGBTQ+ Cultural District will pay homage to the struggles that have shaped its community and embrace a dynamic present and future.

*Commemorate, recognize, and highlight the people, **spaces, buildings,** events, and physical elements that contribute to the history and culture of the LGBTQ+ community in Hillcrest.*

In 5.0 LGBTQ+ Cultural Districts of the Focused Plan Amendment;

This section should specifically state in "Key Objectives of the LGBTQ+ Cultural District" that designated historic LGBTQ+ sites should be preserved and incorporated in any new development. Additionally this section should specifically state that identifying potential

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LGBTQ+ historic sites will add additional LGBTQ+ history and memory as the cultural district ages and develops.

The “Key Objectives of the LGBTQ+ Cultural District” should acknowledge, in addition to entertainment and commercial business establishments, the importance of social service agencies and community based organizations as a significant part of LGBTQ+ culture and history.

The San Diego LGBTQ Historic Sites Projects supports the concept of an historic Hillcrest district that includes the important places and buildings that comprise the LGBTQ community’s meeting places, social locations and businesses. These were and still are important and potentially historic locations where the community became visible, politically active and grew strength from community gatherings and memorials.

Preservation of “important features and historic characteristics” is welcome but appear to be trinkets and more “rainbow washing”. We support the protection of historic street frontages (although we do not fully understand what this exactly means. The Stonewall Inn in New York is a designated National Historic Site yet the façade of the Inn is quite different that what existed in the 1969 riots. The Stonewall Inn is recognized for its event that occurred) and the adaptive reuse of these historic buildings.

E. How will the Hillcrest Focused Plan Amendment be implemented?

2. Supplemental Development Regulations

Preservation of important features and historic characteristics within the boundary of the proposed Hillcrest Historic District through the protection of historic street frontages...The Hillcrest Historic District CPIOZ boundary aligns with the proposed Hillcrest Historic District, which has been fully evaluated in the Hillcrest Historic District Nomination and found to be significant as the historic commercial core of Hillcrest and for its important association with San Diego’s LGBTQ+ community...The Hillcrest Historic District CPIOZ and associated SDRs will retain important historic features and characteristics of the Hillcrest Historic District while encouraging the continued use and adaptive reuse of these buildings as well as increased development of homes within the Hillcrest core.

Focused Plan Amendment: 5.3 Interpretive Elements

The Project supports the incorporation of interpretive elements and recommends the avoidance of standard plaques and landmarks. At the same time, The Project stresses the avoidance of “rainbow washing” in artwork, buildings, streetscapes, signage, etc. Plaques and installations are secondary to actual physical sites.

Adaptive reuse, rehabilitation, repurposing are options that can integrate old and new. Additionally these sections should specifically state that identifying potential LGBTQ+ historic sites can add additional history and memory as the cultural district ages and develops.

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These interpretive elements should utilize a family of components that truly links the district and provides the excitement of the pedestrian and visitor to move from history to entertainment to just celebrating culture of LGBTQ+ Hillcrest. Designated LGBTQ+ historic sites and potential LGBTQ+ historic sites can be used as landmarks that truly tell the story of the community. Locating these interpretive elements at historic sites (both designated and potential) set up a “true rainbow” of linkages and nodes that can become community focal points.

The Cultural District should have a strong financial backed maintenance program to avoid these elements from becoming worn, deteriorated, and graffitified as well as a time line for implementation. If individual businesses are expected to provide these components, we foresee a long “waiting period.”

5.6 POLICY

As previously stated in 5.3, incorporate in CD-2 the Trans, Black, BIPOC, API, Indigenous LGBTQ+ community stories into the LGBTQ+ Cultural District.

As discussed in the comments previously, this section should include and specifically state a policy that designated historic LGBTQ+ sites should be preserved and incorporated in any new development. Additionally these sections should specifically state that identifying potential LGBTQ+ historic sites can add additional history and memory as the cultural district ages and develops.

Chapter 11: Historic Preservation

On HP-244 “No resources reflecting the fifth and final theme of development (1970-present) are currently listed on the City’s Register” is incorrect as The Center/Gayzette/Albert Bell Building at 3780 Fifth Avenue is a designated resource.

In conclusion, Chapter 5 LGBTQ+ Cultural and Chapter 11: Historic Preservation should work together for the preservation and designation of LGBTQ+ historic sites. By acknowledging, preserving and incorporating the LGBTQ+ history of Hillcrest past, only then can Hillcrest truly engage with the LGBTQ+ present and future. The San Diego Historic Site Projects looks forward to working with City Planning in its evolution of the Hillcrest Focused Plan Amendment.

Charles S. Kaminski

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May 24, 2024

City of San Diego Planning Commission
City Administration Building, 12th Floor
202 C Street, San Diego, California 92101

Subject: Support for Blueprint SD

Dear Chair Moden and Planning Commissioners,

On behalf of the San Diego Regional Chamber of Commerce (Chamber) and the below organizations, I am writing to express our support for Blueprint SD, the City of San Diego's General Plan Refresh. Blueprint is a timely effort that will create a framework for future growth for the City and allow for much needed housing to be built. Since 2008, the last General Plan update, San Diego's population has grown and the City has continued to develop into a world-class economic center. This economic development brings both unique opportunities and unique challenges for future residential and commercial development that will be needed to accommodate a growing population and help reduce the housing availability and affordability crises present in the City. Blueprint SD is an important step in addressing these challenges. It updates the General Plan City of Villages strategy to emphasize the City's climate goals and the opportunity for mixed-use and transit-oriented development near job centers.

Our organizations are particularly supportive of Blueprint's emphasis on new housing development. Our city, region, and state are facing a severe shortage of housing units, and more development capacity is sorely needed to meet San Diego's housing demand. Blueprint expands this capacity by including policies for increased density in village areas (LU-A.7, Table LU-7a). It also emphasizes and enhances mixed-use zoning to allow for more housing mixed with retail space in future community plan updates (LU-C.2.a.1, EP-B.6). This can benefit businesses, reduce emissions, and create economically thriving communities. As the City moves forward in adopting and implementing Blueprint, we urge the City to encourage all types of development, including residential and commercial, to promote the growth of both housing for San Diegans and the growth of the many industries and businesses that serve as the foundation for San Diego's flourishing economy. To put

it simply, residential and commercial development are explicitly linked, and regional centers and economic hubs need both residential and commercial development.

In addition, Blueprint SD comes with a citywide environmental impact report (EIR). This EIR will speed up the process of Community Plan Updates (CPUs), which are taking 5-7 years to complete, partially because of lengthy EIRs for the affected Community Plan Areas. Blueprint's citywide EIR will speed up the CPU process because that EIR can be used in place of a specific CPU EIR. This means individual CPUs can be completed quicker, adding needed housing capacity faster and identifying new locations for businesses and industries that are critical to our city's economy. We are supportive of the inclusion and adoption of this citywide EIR.

Increased zoning flexibility is another important element present in Blueprint. Industrial-flex zoning will allow San Diego's innovation economy to thrive. Science and technology companies and research centers can be located adjacent to homes, transit, and retail centers and create thriving communities. The inclusion of additional Prime Industrial Land-Flex will support this (EP-A.16, EP-A.17).

While we appreciate this addition of this flex zoning, we also want to caution the City in moving forward with any type of policy that completely erases Prime Industrial Land zoning, as there are specific industries and businesses in San Diego that need to operate within these zones. Adding new housing capacity and changing existing zoning does have the potential to present challenges to certain industries and businesses, especially industrial uses. We advocate for a balance between the need to promote flexibility and the need to preserve specific land spaces that are direly needed by particular industries to continue to operate and thrive in San Diego. We hope to continue to work with the City on identifying locations for industrial uses and revisiting current and potential prime industrial lands. Working together to identify these locations can help the City and industry be proactive about industrial use placements and eliminate future issues that can arise due to the proximity of residential development and industrial uses. Finding a thoughtful balance of residential and commercial zones is crucial for our City's growth and economic vitality, and our organizations are committed to being involved in the conversations around this balance.

Overall, we are appreciative of Planning Department staff's hard work on Blueprint SD and are eager to see its adoption. It can pave the way for sustainable development in the City, especially the construction of housing that is desperately needed for our City's residents and workforce.

We encourage the Planning Commission to support Blueprint SD. Thank you for your thoughtful consideration of our feedback. If you have any questions, please contact Evan Strawn, Policy Advisor, estrawn@sdchamber.org.

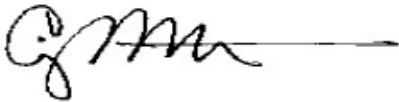
Respectfully,



Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce



Lori Holt Pfeiler
President & CEO
Building Industry Association of San Diego
County



Craig Benedetto
Legislative Advocate
NAIOP San Diego



Jeremy Bloom
Chief Operating and Development Officer
Circulate San Diego



Melanie Woods
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Melanie Cohn
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Fred Tayco
Executive Director
San Diego County Lodging Association



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May 24th, 2024

To Whom It May Concern,

We would like to express our sincere gratitude to the city and the dedicated planning department staff for their tireless efforts on Plan Hillcrest. We are thrilled to see the comprehensive changes that will benefit our community.

In particular, the inclusion of the LGBTQ district, the updates to land use that will welcome more neighbors, and the improvements to the transportation network aimed at enhancing safety are especially exciting. These forward-thinking changes reflect a commitment to creating a more inclusive and safer community, which we fully support.

Vibrant Uptown held two town halls during the development process of Plan Hillcrest, with 200 Uptown residents attending to discuss and comment on the LGBTQ+ Cultural District and the overall draft. All comments received were provided to the planning department. Upon reviewing this third draft of the plan, we are excited to see many of the comments from those attendees included. It is gratifying to see that the authors are listening to the voice of the community as this moves forward.

We recommend the commission approve the changes proposed in Plan Hillcrest and we look forward to seeing the positive impact these developments will have on our community.

Best,

Jon Anderson

A handwritten signature in black ink, appearing to read "Jon Anderson".

Founding Member
Vibrant Uptown

Chapter 13: Zones

Article 2: Overlay Zones

Division 16: Potential Historic District Overlay Zone

§132.1601 Purpose of the Potential Historic District Overlay Zone

The purpose of the Potential Historic District Overlay Zone is to provide interim protection measures to guard against loss of the overall integrity of potential *historic districts* identified through survey evaluation and their eligibility for designation as a *historic district*.

§132.1602 Where the Potential Historic District Overlay Zone Applies

- (a) This overlay zone applies to properties within predominantly residential areas that have been identified as potential *historic districts* through survey evaluation and require supplemental *development* regulations, and that have been incorporated by ordinance into this overlay zone. Table 132-16A lists the Potential Historic District Overlay Zones and the corresponding rezone maps that indicate which properties are within the boundaries of the overlay zone. These maps are filed in the office of the City Clerk. The properties within this overlay zone are shown generally on Diagrams 132-16A through 132-16Z.

Table 132-16A
Potential Historical District Overlay Zone

Potential Historic District Overlay Zone	Map Number Showing Boundaries of Potential Historic District Overlay Zone
28 th Street Residential (See Diagram 132-16A)	[Insert no. for C or B Sheet]
Arnold & Choate's (See Diagram 132-16B)	[Insert no. for C or B Sheet]
Culverwell & Taggart's Addition (See Diagram 132-16C)	[Insert no. for C or B Sheet]
Dove Street (See Diagram 132-16D)	[Insert no. for C or B Sheet]
Heart of Banker's Hill (See Diagram 132-16E)	[Insert no. for C or B Sheet]
Horton's Addition (See Diagram 132-16F)	[Insert no. for C or B Sheet]
Inspiration Heights (See Diagram 132-16G)	[Insert no. for C or B Sheet]
Inspiration View (See Diagram 132-16H)	[Insert no. for C or B Sheet]
John Sherman (See Diagram 132-16I)	[Insert no. for C or B Sheet]
Kalmia Place (See Diagram 132-16J)	[Insert no. for C or B Sheet]
Marine View (See Diagram 132-16K)	[Insert no. for C or B Sheet]
Marston Family (See Diagram 132-16L)	[Insert no. for C or B Sheet]
Marston Hills (See Diagram 132-16M)	[Insert no. for C or B Sheet]
Mission Hills Historic District Expansion (See Diagram 132-16N)	[Insert no. for C or B Sheet]

Potential Historic District Overlay Zone	Map Number Showing Boundaries of Potential Historic District Overlay Zone
North Florence Heights (See Diagram 132-16O)	[Insert no. for C or B Sheet]
Northwest Mission Hills (See Diagram 132-16P)	[Insert no. for C or B Sheet]
Park Boulevard Apartment East (See Diagram 132-16Q)	[Insert no. for C or B Sheet]
Park Boulevard Apartment West (See Diagram 132-16R)	[Insert no. for C or B Sheet]
Park Edge North (See Diagram 132-16S)	[Insert no. for C or B Sheet]
Presidio Hills (See Diagram 132-16T)	[Insert no. for C or B Sheet]
Robinson Place (See Diagram 132-16U)	[Insert no. for C or B Sheet]
Second Avenue (See Diagram 132-16V)	[Insert no. for C or B Sheet]
Shirley Ann Place Historic District Expansion (See Diagram 132-16W)	[Insert no. for C or B Sheet]
South Park (See Diagram 132-16X)	[Insert no. for C or B Sheet]
Spalding Place (See Diagram 132-16Y)	[Insert no. for C or B Sheet]
West University Heights (See Diagram 132-16Z)	[Insert no. for C or B Sheet]

- (b) Table 132-16B shows the location of the supplemental regulations and the type of permit required by this division, if any, for specific types of *development* proposals in this overlay zone.

Table 132-16B
Potential Historical District Overlay Zone Applicability

Type of <i>Development</i> Proposal	Supplemental Development Regulations	Required Permit Type/Decision Process
(1) <i>Development</i> on a parcel containing a non-contributing resource.	None - Exempt from this division	No permit required by this division
(2) <i>Development</i> on a parcel containing only structures less than 45 years old.	None - Exempt from this division	No permit required by this division
(3) <i>Development</i> impacting only structures containing non-residential uses.	None - Exempt from this division	No permit required by this division
(4) Interior building improvements that do not involve a change in use or provide additional <i>floor</i> area, or improvements that do not require a <i>construction permit</i> in accordance with SDMC 129.0203.	None - Exempt from this division	No permit required by this division
(5) Building improvements identified in SDMC 143.0212(a)(1)-(4).	None - Exempt from this division	No permit required by this division
(6) Any <i>development</i> within the boundaries shown on a map identified in Section 132.1602, where <i>development</i> complies with Section 132.1603.	Section 132.1603	Construction Permit/Process One
(7) Any <i>development</i> within the boundaries shown on a map identified in Section 132.1602, where <i>development</i> does not comply with Section 132.1603.	Section 132.1603	Neighborhood Development Permit/ Process Two

- (c) As the Potential Historic District Overlay Zone is intended to provide only interim protection of potential *historic districts*, this overlay zone shall be amended to remove a potential *historic district* once that district is brought forward for historic designation consistent with the Municipal Code and Historic District Nomination Procedures. If the potential *historic district* is designated by the Historical Resources Board, the *historic district* would be subject to the requirements of the Historical Resources Regulations. If the potential *historic district* is found ineligible for designation by the Historical Resources Board, it would be removed from the Potential Historic District Overlay Zone and no further regulation or protection measures would apply.
- (d) Individual properties within the Potential Historic District Overlay Zone will continue to be subject to the Historical Resources Regulations found in Chapter 14, Article 3, Division 2. This includes *designated historical resources*, as well as resources determined potentially individually significant under Section 143.0212.

§132.1603 Supplemental Regulations of the Potential Historic District Overlay Zone

Development within the Potential Historic District Overlay Zone on a parcel containing a potential contributing resource shall be subject to review for compliance with the following supplemental regulations.

- (a) No modifications or additions to an existing *single dwelling unit* or *multiple dwelling unit structure* shall be permitted on the front two-thirds (2/3) of the original building footprint, unless:
 - (1) The modification proposed will repair existing historic materials consistent with the U.S. Secretary of the Interior's Standards; or
 - (2) The modification proposed will restore the *structure* to its historic appearance consistent with the U.S. Secretary of the Interior's Standards based on photo documentation or the written opinion of a Historic Preservation Architect. The project plans shall include information demonstrating how the modification will result in the restoration of the *structure*, and a copy of the supporting photo documentation or written opinion shall be included with the application.

§132.1604 Deviations to the Potential Historic District Overlay Zone

An *applicant* may request to deviate from the supplemental regulations in Section 132.1603 by applying for a Neighborhood Development Permit. Deviations may be approved or conditionally approved with a Neighborhood Development Permit in accordance with a Process Two only if the decision maker makes all of the *findings* in Section 126.0404(a) and the supplemental *findings* in Section 126.0404(f).

Comments on the Hillcrest Focused Plan Amendment May 25, 2024 draft to the Uptown Community Plan

Sharon Gehl slgehl2000@gmail.com

The LGBTQ+ Cultural District is a better way to tell history

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 to tell us about history, most people are not interested in spending money on historic buildings. All City of San Diego, San Diego County, and California state historic buildings lose money. 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 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 turning buildings into museums is not an effective or popular way to tell history. The theory was wrong.

The overwhelming majority of historic museums lose money, because they don't have enough customers to support them. 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 for taxpayer money to bail their museums out.

Despite the taxpayer money and private donations, it was still difficult for professional preservationists to make money from historic museums. 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^[6]

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, social equity, or increasing our housing supply and tax base; 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 using buildings. 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.

Comments on the Hillcrest Focused Plan Amendment May 25, 2024 draft to the Uptown Community Plan

Sharon Gehl slgehl2000@gmail.com

Remove policy HP-2.1 from Uptown Plan

There is a huge mistake on page HP-233 of the Uptown Community Plan Hillcrest Focused Plan Amendment, March 2024 Draft. Under Policies, HP-2.1 calls for “interim protection” for potential historic districts. Interim protections were voted down by the city council in 2016, because they could create serious legal problems. They should not still be in the Uptown, North Park, and Greater Golden Hill Community Plans eight years later.

POLICIES

HP-2.1 Provide interim protection of potential historic districts until such time as they can be intensively surveyed, verified, and brought forward for Historic Designation consistent with City regulations and procedures.

New historic regulations to “Provide interim protection” were in an “overly Zone” which were part of the proposed Uptown, North Park, and Greater Golden Hill Community Plan Updates in 2016. They would have treated all 26 proposed historic districts in the three communities as if they were already actual legal historic districts, without first spending millions of dollars to do the research needed to see if any of the proposed districts met the legal standards, present them to community groups, and then HRB. This would have affected thousands of properties.

City staff said at a recent Planning Commission meeting that interim protection of potential historic districts was just something that was discussed as part of the three 2016 community plan updates, not actual legal regulations that were part of the plan. But that isn’t true.

Attached are the 2016 “Potential Historic District Overlay Zone” regulations, that would “provide interim protection measures to guard against loss of the overall integrity of potential historic districts identified through survey evaluation and their eligibility for designation as a historic district.” These Overlay Zones were presented to the Planning groups in each community and then to the HRB, which recommended that the Planning Commission approve them.

A cursory survey evaluation is not sufficient to establish eligibility for designation, and yet the new regulations would have forced designation on thousands of properties without doing the research and taking all legal steps necessary for designation in the City of San Diego. Once

Historic Preservation Planning had control of the properties, there would have been little reason to spend money to “bring that district ...forward for historic designation consistent with the Municipal Code and Historic District Nomination Procedures.” After all, they might find if they did the proper research that the potential district did not actually meet the requirements to be a district.

As an example, the residents of one of the listed potential historic districts in 2016, Presidio Hills, were able to spend the time and money to show that enough of the properties listed as potential contributors to that district by an old drive-by survey, did not actually qualify because of past remodels that made major changes to the front of the homes. Without those properties, the potential district did not have enough contributors to qualify as a district, and was taken out of the Uptown Plan by the City Council when the Uptown Plan was voted on.

These proposed new regulations were actually stricter than the existing regulations for historic districts at the time. They said “No modifications or additions to an existing single dwelling unit or multiple dwelling unit structure shall be permitted on the front two-thirds (2/3) of the original building footprint, unless” it was to repair or replace a feature that was or might have been originally there. There were plenty of existing examples at the time of dwelling units that had undergone major additions that were within two-thirds of the original building footprint.

The idea of applying regulations to 26 potential historic districts in the three communities was so egregious that there was a lot of opposition in the Uptown community. Fortunately, a major property owner in Hillcrest, Bennet Greenwald, hired a land use lawyer to talk to the city about the legal problems adopting a Potential Historic District Overlay Zone that covered thousands of properties in three communities would create for the city.

At almost the last moment, those who opposed these regulations found out that they would be voted on by the city council only once, when the North Park Plan was voted on two weeks before the Uptown Plan would go to the Council. If the new regulations had been approved as part of the North Park Plan Update, it would have also applied to the other two community plans as of that date.

Fortunately, the city council took the “interim protection” regulations out of the North Park, Uptown, and Golden Hill Plan Updates eight years ago. The Planning Department should have taken Policy HP-2.1 out of the three plans at the same time. Please take it out of the Uptown Community Plan Hillcrest Focused Plan Amendment now.

May 28, 2024

To: Planning Commissioners

Re: Hillcrest Focused Plan Amendment Historic Preservation Element

Dear Commissioners,

Please consider the following comments and recommendations regarding the Historic Preservation Element of the Hillcrest Focused Plan Amendment.

Section 11.3 EDUCATIONAL OPPORTUNITIES AND INCENTIVES RELATED TO HISTORICAL RESOURCES

The educational aspects of historic preservation are well-covered by the policies in this section; however, most people experience historic preservation in the everyday use of historic buildings. Rather than viewing development and preservation as antagonistic interests, the Historic Preservation Element and associated policies should emphasize adaptive reuse as a way to harmonize those interests.

Accordingly, we recommend that these additional policies be added on page HP-249 of the May 22, 2024, draft Hillcrest FPA:

Proposed additional policy: HP-3.7 Emphasize adaptive reuse rather than destruction of historic buildings, thereby reducing landfill construction waste and ensuring compatibility with surrounding buildings.

Proposed additional policy: HP-3.8 Collaborate with community planning groups and historic districts to define neighborhood design standards, which will set expectations for both developers and community members and reduce contention over projects.

Proposed additional policy: HP-3.9 Create community centering places around historic resources.

Proposed additional policy: HP-3.10 Enhance pedestrian access and enjoyment of commercial historic districts through better sidewalks, including shade trees.

Historic preservation and adaptive reuse complement each other by allowing further development while maintaining the sense of place that attracts both neighborhood residents and outside visitors, creating socially and economically vibrant communities.

Other benefits of adaptive reuse include:

- Furthers the city's sustainability goals by reducing landfill waste.
- Promotes mobility goals by creating attractive, human-scale, walkable neighborhood centers.
- Addresses housing needs by preserving existing naturally-occurring affordable housing.

Architecture is our most public art, and unlike art and artifacts sequestered into museums, it is part of our everyday lives that we can touch and inhabit. Cities that have embraced historic preservation have found that they are important drivers of economic activity that justify the tax investments and regulations that are used to maintain them.¹ The fact that so much attention is being given to Hillcrest is proof of people’s preferences for historically-centered places.

Section 11.2 IDENTIFICATION AND PRESERVATION OF HISTORICAL RESOURCES

The policies listed on page HP-247 of the May 22, 2024, draft Hillcrest FPA include:

HP-2.2 Intensively survey and prepare nominations for the potential historic districts identified in the Uptown Historic Resources Survey and bring those nominations before the Historical Resources Board for review and designation. Prioritization of district nominations may occur in consultation with community members and stakeholders based upon a variety of factors, including redevelopment pressures and availability of resources.

HP-2.3 Provide support and guidance to community members and groups who wish to prepare and submit historic district nominations to the City, consistent with adopted Guidelines.

We strongly support these policies; however, as noted in policy HP-2.2, the processing throughput of historic districts is currently limited by Historic Resources staff levels. Policy HP-2.3 addresses this need by fostering a partnership between city staff and community preservationists that will enable Historic Resources staff to process more districts and clear the current backlog. This includes local recognition of districts listed on the National Register of Historic Places.

Regarding the statement that historic preservation be conditioned on “redevelopment pressures” as stated in Policy Hp-2.2, much of the opposition to historic preservation is based on the premise that historic preservation has a significant impact on housing development and affordability. To put this in perspective, San Diego has a Regional Housing Needs Allocation (or RHNA) goal of 108,036 new homes.² The city’s own inventory of existing zoning, called the Adequate Sites Inventory, is 175,000, not including Community Plan Updates since 2020. This means that San Diego has already met the housing capacity goals set by the State of California’s Housing and Community Development department. Further, recently completed and pending Community Plan Updates will add the capacity for hundreds of thousands more units. This does not count programs such as Complete Communities Housing Solutions and Accessory Dwelling Units, which add the capacity for millions more housing units without changing San Diego’s zoning.

Given this massive overcapacity of developable land, the public has a reasonable expectation that future development can and should be done with thoughtful planning, including proper

¹ Adina Solomon, “Preserving History Boosts Local Economies,” *U.S. News & World Report*, November 22, 2017.

² City of San Diego, “General Plan Housing Element and Reports,” <https://www.sandiego.gov/planning/work/general-plan/housing-element>

consideration for preserving historic resources, which comprise a small percentage of land zoned for housing.

Again, we ask that you consider historic preservation, including adaptive reuse, as an important part of community planning and development. Accordingly, we ask that you further consider the additional policies that we have proposed in support of those goals.

Respectfully,

Geoffrey Hueter

Laura Henson