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[www.MissionHillsHeritage.org](http://www.MissionHillsHeritage.org)

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

July 16, 2024

Historical Resources Board  
City of San Diego  
1222 First Avenue, MS 501  
San Diego, CA 92101

Re: HRB Hearing Date: July 25, 2024  
Request for Board to Direct Staff to Place Proposed Amendments to HRB Policy 4.1  
and HRB Procedures on next Policy Subcommittee Agenda

Dear Chair Hutter and Board Members:

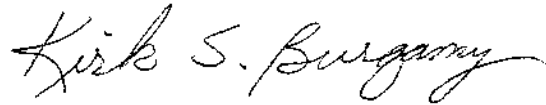
Please recall that in November 2023, this Board directed staff to place proposed amendments to Policy 4.1 and this Board's procedure's, relating to the listing of national register districts on the local register under criterion E, on the next Policy Subcommittee meeting agenda. Staff eventually put the matter on the March 2024 policy subcommittee meeting. At that meeting, Board Member Farley requested that staff provide a redline analysis of the proposed amendments. Staff indicated that it would do so and the matter would return by the June 2024 policy subcommittee meeting. Notwithstanding the subcommittee's direction to staff, that meeting was cancelled as was the July Policy Subcommittee meeting.

Because we have no indication from Staff that it intends to put the proposed amendments on a future Policy Subcommittee agenda, we have no other recourse than to ask this Board to once again direct staff to put the amendments on the next Policy Subcommittee agenda. The Policy Subcommittee can act in the absence of any recommendations from Staff: the plain language of the amendments speak for themselves, and the subcommittee members are fully capable of interpreting them without Staff's feedback.

In light of these events and our nomination of Inspiration Heights to the local register, pending since 2021, we can only surmise that the City has no interest in recognizing national register historic districts locally, despite its past precedent of doing so, as well as the clarity it would bring for homeowners and developers alike. The amendments are not a policy change and the City itself does not view the ongoing preservation in progress initiative as a reason to put off implementing amendments as needed, as demonstrated by its own recent amendments in February 2024.

As a reminder, no less than 10 preservation groups support these amendments. To date, the SHRC has recognized three national register districts in San Diego, and another is pending. The City, however, continues to stonewall despite its own analysts concluding in their IBA Report that a robust historic district program would benefit everyone. Local designation of national register districts is the only way to unlock the benefits of the Mills Act contract, and Staff has previously indicated that the Mills Act contract is the strongest incentive to preservation in the City's toolbox. As a Board bound to act in the interest of historic preservation, please direct staff to put the proposed amendments related to Policy 4.1 and this Board's procedures on the next Policy Subcommittee agenda.

Sincerely,

A handwritten signature in black ink, reading "Kirk S. Burgamy". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Kirk S. Burgamy, President

# NEIGHBORHOOD HISTORIC PRESERVATION COALITION

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Advocating for measures that preserve our established neighborhoods and historic resources for future generations

Historical Resources Board  
City of San Diego  
1222 First Avenue, MS 501  
San Diego, CA 92101

Re: HRB Hearing Date: July 25, 2024

Request for board to direct staff to place proposed amendments to HRB Policy 4.1 and HRB procedures on next Policy Subcommittee agenda

Dear Chair Hutter and Board Members,

The Neighborhood Historic Preservation Coalition is writing to you today in support of the July 16, 2024 letter from Mission Hills Heritage in regard to their request for the Historical Resources Board to direct staff to place proposed amendments to HRB Policy 4.1 and HRB Procedures on the next Policy Subcommittee agenda.

To date, the SHRC has recognized three National Register districts in San Diego, with another pending. However, the City continues to delay action despite its own analysts concluding in their IBA Report that a robust historic district program would benefit everyone. Local designation of National Register districts is the only way to unlock the benefits of the Mills Act contract, and staff has previously indicated that the Mills Act contract is the strongest incentive for preservation in the City's toolbox. As a board bound to act in the interest of historic preservation, please direct staff to place the proposed amendments related to Policy 4.1 and this board's procedures on the next Policy Subcommittee agenda.

Submitted by SOHO on behalf of the Neighborhood Historic Preservation Coalition.