



2801 B Street, Suite 100  
San Diego, CA 92102

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Suzanne Segur, Senior Planner  
Heritage Preservation and Planning, City of San Diego Planning Department

Kristi Byers, Chair, Historical Resources Board  
Policy Subcommittee Members: Rammy Cortez, Carla Farley, Melanie Woods

**RE: Preservation and Progress – Package A, Part 1**

Dear Ms. Segur, Chair Beyers, and Policy Subcommittee Members,

As a historical resources consultant experienced in San Diego's regulations, I appreciate the opportunity to comment on the Preservation and Progress Package A, Part 1 reforms. I support the City's effort to improve clarity, flexibility, and fairness in the preservation process and commend several proposed amendments. However, I write to express concerns and offer suggestions to help maintain policy balance.

I support the proposed amendments to Board composition under SDMC §111.0206, which provides flexibility in filling technical seats. I also support clarifying the respective roles of the Historical Resources Board and City Council in commenting on National and State Register nominations, as outlined in SDMC §123.0206.

The appeal procedure in SDMC §123.0203 presents equity and feasibility concerns. Requiring appellants to specify all grounds and submit documentation within 10 business days is impractical for property owners. Clarification is also needed regarding the proposal to allow appeals of non-designations. Does this extend standing beyond the property owner? I urge that the right to appeal remain limited to property owners to maintain fairness and avoid procedural misuse. In addition, the proposed "Findings Not Supported" ground for appeal requires clarification—what standard will be used to evaluate adequacy of findings? An amended version of SDMC §123.0203(d)(4) accompanies this letter. It preserves the 10-day filing deadline but allows additional time to submit supporting documentation.

Lastly, I urge the Subcommittee to consider the impact of restricting Complete Communities incentives within historic districts under SDMC §143.1002. If a historic district would limit housing development, the nomination should include a housing impact statement estimating potential unit loss.

Thank you for the opportunity to comment. I support the Preservation and Progress initiative and encourage thoughtful refinements to ensure it remains fair, effective, and aligned with San Diego's broader goals.

Best Regards,

A handwritten signature in black ink that reads "Jennifer Ayala".

Jennifer Ayala  
619-985-9280



## **Alternate Proposed Amendments to SDMC §123.0203(d)(4)**

### **Version 1 – 10-Business-Day Filing; Flexible Supporting Documentation**

(d)(4) A general description of the grounds upon which the appellant is filing the appeal. The initial appeal application must be filed within 10 business days of the Historical Resources Board decision, but supporting documentation and detailed evidence may be supplemented up to and during the City Council hearing. The City Council shall retain discretion to accept additional materials at or before the hearing date.

**Rationale:**

- Preserves the City's proposed 10-business-day appeal deadline.
- Recognizes the practical need for more time to compile evidence and expert reports.
- Enhances procedural fairness by allowing flexibility in presenting supporting materials.

### **Version 2 – 30-Business-Day Filing; Complete Appeal Required**

(d)(4) A complete appeal application, including all supporting documentation and clearly identified grounds, must be submitted within 30 business days of the Historical Resources Board decision. The City Council shall consider only those grounds and evidence submitted within this timeframe unless it specifically requests additional information.

**Rationale:**

- Extends the appeal window to 30 business days, allowing adequate time for documentation.
- Aligns with staff's desire for a complete appeal packet upon filing.
- Provides certainty and transparency to all parties ahead of Council review.

**Edits to Proposed Municipal Code Amendments for Preservation and Progress  
Submitted to the HRB Policy Subcommittee Meeting July 14, 2025  
By Priscilla Ann Berge**

**Under §123.0203 Appeal From Historical Resources Board Decision**

(c) A designation decision may be appealed on any of the following grounds:

**Delete** (3) Findings Not Supported. The Board's stated findings to designate are not supported by the information provided to the Board; or.]

**Note: Does the city council really want to spend time reviewing an appeal of a nomination de nova to determine whether a resource is historic? Does this mean that appeals can be for not being designated as well as being designated?**

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**Under §123.0206 State and National Register**

a) As a Certified Local Government, the Historical Resources Board is required by Section 101(c)(2)(A) of the National Historic Preservation Act to **opine** **review and comment on** whether a property nominated for inclusion in the National Register of Historic Places **[insert] or California Register of Historical Resources** meets the criteria for listing. . . .

(b) If a nomination to the National Register of Historic Places or California Register of Historical Resources is . . . .

**Note: insert “review and comment” and insert “or California Register of Historical Resources” for consistency with wording in the CLG requirements and between a) and b).**

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**§111.0206 Historical Resources Board**

(b) Appointment and Terms

(2) . . . Other members appointed may have experience or background in law, real estate, engineering, general contracting, finance, planning, or fine arts and should reflect diverse neighborhood representation and **[insert] shall** have demonstrated a special interest in historical preservation.

**Note: in all other California cities, all or a majority of members of a city's Historic Resources Board or Commission must meet the Secretary of the Interior's Standards for recognized historic preservation professionals.**

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## Kaline, Kelsey

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**From:** City of San Diego Official Website <NoReply@sandiego.gov>  
**Sent:** Sunday, July 13, 2025 10:57 AM  
**To:** Historical Resources Board Admin  
**Subject:** [EXTERNAL] Webform submission from: Historical Resources Board Public Comment Form

Submitted on Sun, 07/13/2025 - 10:57

\*\*\*\* CONTACT INFO \*\*\*\*

NAME:  
Kristin Harms

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kristin@uhhs-uhcdc.org

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4452 Park Blvd., Suite 104  
San Diego, CA 92116

\*\*\*\* MEETING INFO \*\*\*\*

MEETING DATE:  
2025-07-14

COMMENT TYPE:  
Agenda Comment

AGENDA ITEM NUMBER:  
5

POSITION:  
In Opposition to Item

I WOULD LIKE TO SPEAK ON THE ITEM DURING PUBLIC TESTIMONY:  
No

COMMENTS:  
The University Heights Historical Society strongly supports the proposal to "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."

However, the UHHS strongly opposes Section 123.0203, subsection (c)(3) of the Draft Proposed Code Amendment, which states "Findings Not Supported: "The Board's stated findings to designate are not supported by the information provided to the Board." This proposal would allow political influence into what should be an objective decision-making process.

The City Council lacks the necessary expertise to make these determinations, which should remain with qualified professionals.

SUPPORTING DOCUMENTS:

[webform\_submission:values:supporting\_documents\_multiple\_file\_10]

**Kaline, Kelsey**

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**From:** Sharon Gehl <slgehl@cox.net>  
**Sent:** Friday, July 11, 2025 5:46 PM  
**To:** Historical Resources Board Admin  
**Subject:** [EXTERNAL] Re: Preservation & Progress at July HRB Policy Subcommittee

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

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I won't be able to attend the HRB policy committee meeting Monday. Please ask staff the following three questions.  
1) What is the total number of properties in the city's existing historical districts, including noncontributing properties?  
2) How many proposed historical districts total does the city have in it's community plans, surveys, etc; including proposed multi property non-contiguous proposed districts?  
3) what is the total number of properties in these proposed districts?  
Thank you for your help.  
Sharon Gehl

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, July 9, 2025, 3:14 PM, City of San Diego <historicalresourcesbrd@sandiego.gov> wrote:



## Preservation & Progress at July HRB Policy Subcommittee

Greetings!

Thank you for your interest in following the Preservation & Progress initiative. This is an announcement that elements of Package A of Preservation & Progress will be presented to the HRB Policy Subcommittee on Monday, July 14, 2025 at 4 p.m. Members of the public may attend this meeting in person or online. Due to the limited in-person space, we recommend attending virtually. For information on how to participate and provide comments, please view the agenda by clicking the blue button below. Your input is valued, and we want to hear from you!

**Attend the meeting in person:**

City Administration Building  
City Planning Large Conference Room- 5th Floor  
202 C St., San Diego, CA 92101

**Attend the meeting virtually:**

[Meeting Webinar Link](#)

Meeting ID: 160 363 3302 Passcode: ysF4GZ

**To join by using your phone:**

Dial 1-669-254-5252

When prompted, input **Webinar ID: 160 363 3302**

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