

Kelley Stanco, Deputy Director  
City Planning Department, City of San Diego  
Kristi Byers, Chair, Historical Resources Board  
Policy Subcommittee Members: Rammy Cortez, Carla Farley, Melanie Woods

## **RE: Preservation and Progress – Package A, Part 2**

Dear Ms. Stanco, Chair Byers, and Policy Subcommittee Members,

Thank you for the opportunity to comment on Package A, Part 2. These comments are framed in the context of the Preservation and Progress program's comprehensive update to the Heritage Preservation Program's stated goals<sup>1</sup>:

- 1) Streamline processes
- 2) Protect truly significant resources
- 3) Facilitate adaptive reuse
- 4) Advance equity
- 5) Implement practical incentives

**Appeals of Non-Designations** – Please limit appeals of non-designations to property owners or voluntary nominations to reduce misuse and delays, which supports the goal of making historic determinations more efficient and protecting truly significant resources. (Agenda Memo, p. 3)

**Equity and Inclusion** – Support these expanded these efforts. HP-A.5(j), HP-B.1(b)

**Tribal Cultural Resources** – Support these expanded efforts. HP-A.3, HP-A.4(c), (e),(h),(i)

**Sustainability Language** – HP-A.6

- Please keep climate resilience and sustainability goals separate from designation criteria. They could be used to guide rehabilitation and adaptive reuse by permitting Title 24-compliant building changes, such as dual-glazed windows, to improve efficiency, noise reduction, and UV protection, even where not “consistent with the Secretary of the Interior’s Standards.”

**Adaptive Reuse Feasibility** – HP-A.5(e), HP-B.2(g),(j),(k)

- Adaptive reuse can be effective for some property types; however, requiring all projects to be “consistent with the Secretary’s Standards” prevents most density increases. Please create context-sensitive adaptive reuse provisions that allow ministerial review for improvements currently restricted under City regulations, such as Title 24-compliant upgrades, on-site

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<sup>1</sup> <https://www.insidesandiego.org/preservation-and-progress-comprehensive-update-heritage-preservation-program-underway>

relocations, façade preservation, and partial preservation. These policies would increase the feasibility of retaining the character of historic resources while adding housing, supporting the Preservation and Progress goal to facilitate adaptive reuse to meet housing needs.

**Community-Identified Sites – HP-A.5(g)**

- Please recognize community-identified sites and conservation areas only as non-regulatory unless designated.
- Create a tiered designation pathway for ministerial redevelopment with defined requirements.
- Only properties evaluated under all criteria and integrity, and determined eligible through evaluation, should be forwarded to the HRB; listing in a Cultural Resources Report should not be the sole threshold for HRB consideration.

**Incentives, Preservation Fund & Sponsorships – HP-B.2(a)-(k), HP-B.3(a)-(d)**

- While FAR, setbacks, and similar incentives can help, the greater barriers are often site configuration, structural condition, and functional incompatibility with contemporary uses.
- California’s Historic Tax Credit is unpredictable; it depends on annual legislative approval and in 2025 funds were exhausted within the first few months.
- Federal Historic Tax Credits are restrictive; they require National Register listing, qualified expenditures, and consistency with the Secretary’s Standards, which is often not achievable in adaptive reuse housing projects.
- Offering tax credits or grants for adaptive reuse must be paired with flexible standards. “Consistency with the Standards” limits adaptive reuse potential for denser multi-family projects.

**Historic Element Revisions – HP-B.2(k), HP-B.3**

Much of the proposed language is not concerning in isolation, but it is unclear how it will balance preservation and housing. “Simplify permitting for adaptive reuse projects” is a positive step, but if tied solely to the Secretary’s Standards, it will not result in meaningful change.

Thank you for your consideration.

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

Jennifer Ayala  
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