



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: February 3, 2021

TO: Historical Resources Board Policy Subcommittee

FROM: Gemma Tierney, Historical Resources Board Support Staff, Development Services Department

SUBJECT: HRB Criterion E

This memo has been prepared to address a question raised at the September 14, 2020 meeting of the HRB Policy Subcommittee regarding how and why properties are designated under HRB Criterion E.

If a resource is listed on, or officially determined eligible for listing on, the State or National Registers, it meets HRB Criterion E. However, such resources are not automatically added to the City of San Diego Register under Criterion E. Even if a resource undoubtedly meets one or more HRB Criteria, some additional steps are required for it to be added to the San Diego Register, so it cannot occur automatically. Per S.D.M.C Section 123.0202, local designation must occur through Board action that takes place at a public hearing, and the owners of resources being considered for designation must be notified prior to the public hearing. Additionally, the Board's decision to designate must be based on a research report and written findings. In practice, the designation of resources under Criterion E has occurred via an HRB resolution that documents the required written findings, just like designation under any of the other HRB Criteria.

Although designation under Criterion E does not occur automatically for eligible resources, it does provide a simplified path to local designation for these resources. If a resource is already listed on, or officially determined eligible for listing on, the State or National Registers, no additional analysis of the property's significance is required to nominate and designate it locally. In addition to this simplified designation option, another reason that an applicant may pursue designation under Criterion E is simply because they wish to designate their property under multiple HRB Criteria.