

**Staff Responses to Legacy 106 Recommended Word Changes
(dated January 21, 2008)**

Comment Number	Staff Response
1	Pro: refers back to City criteria. Con: language is out of place in discussion of State Law governing designation of properties to the State Register.
2	Pro: numbers are more current than in General Plan Update. Con: numbers will continually change and the year 2006 corresponds to the date of the public review draft update. The final sentence references a survey that has not been completed.
3	Pro/Con: minimal change in wording
4a	Pro: addresses some historic neighborhoods. Con: language is out of place and does not describe the appropriate architectural styles associated with historical resources which is the point of the discussion.
4b-4h	Pro: adds language regarding San Diego's history. Con: this material is not cited, it unnecessarily adds verbiage to the element, and the adopted San Diego history is already provided as an appendix to the General Plan Update.
5	Pro: would expand consultation as part of survey effort. Con: wording is awkward. Staff supports the change in concept and has made edits to result in expanded consultation.
6	Pro: expands discussion of historic preservation. Con: language is out of place and does not result in improvement to the element.
7	Pro: expands discussion of historic preservation. Con: language is out of place, is incorrect, and does not result in improvement to the element.
8	Same as Response #7 above.
9	Pro: deletes language from element. Con: language is correct and should be retained to provide a complete presentation of the state of historic preservation in the City of San Diego.
10	Pro: expands discussion of historic preservation. Con: language is not neutral in tone and does not result in improvement to the element.
11	Same as Response #10 above.
12	Pro: expands discussion of historic preservation. Con: language is not neutral in tone, is not entirely correct, and does not result in improvement to the element.
13	Pro/Con: minimal change in wording that does not result in improvement to the element
14	Pro: adds language. Con: language is not accurate.
15	Pro: specifically calls out the Mills Act. Con: language is not accurate.
16	Pro: expands discussion of historic preservation. Con: language is out of place does not result in improvement to the element.
17	Pro: expands policies related to historic preservation planning. Con: language is inappropriately detailed for General Plan policies and does not result in improvement to the element.
18	Same as Response #17 above.
19	Same as Response #17 above.
20	Same as Response #17 above.
21	Same as Response #17 above.
22	Same as Response #17 above.
23	Same as Response #17 above.

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- 24 Same as Response #17 above.
- 25 Same as Response #17 above.
- 26 Same as Response #17 above.
Pro: Language is improved in first sentence. Con: Second sentence
27 predisposes an outcome that may not be appropriate for all neighborhoods and
the language is vague.
Pro: expands discussion of historic preservation. Con: language is
28 inappropriately detailed for General Plan policies, is not neutral in tone, and
does not result in improvement to the element.
29 Pro: expands discussion of historic preservation related to incentives. Con:
language is too detailed and is out of place.

Pro: Language discusses need to conserve neighborhood character at the
30 community plan level of review. Con: Approach is too broad as it brings urban
design into the Historic Preservation Element. Staff supports the current
language, with reference made to the Urban Design Element and discussion of
urban design and neighborhood character principles provided there.

31 Pro: would increase use of survey data in project review; Con: mandates use of
data whether or not survey is approved.

Pro: would increase staff knowledge related to historic preservation practice.
32 Con: General Plan is not appropriate venue to address training. It is
appropriately addressed in the Work Program and through the Budget process.

33 Pro: expands discussion of historic preservation related to incentives. Con:
language is too detailed, is not entirely accurate, and is out of place.
Pro: expands policies related to historic preservation planning. Con: language
34 is inappropriately detailed for General Plan policies, addresses issues that are
regulated by the Land Development Code, and does not result in improvement
to the element.
35 Same as Response #34 above.
36 Same as Response #34 above.
37 Same as Response #34 above.
38 Same as Response #34 above.
Pro: expands discussion of historic preservation related to Native American
39 consultation. Con: language is too detailed and is not consistent with State law
requirements. This type of detailed consultation is addressed at the project
level, consistent with required mitigation.
40 Pro: expands discussion of historic preservation related to Native American
consultation. Con: language is confusing and out of place.
Pro: expands policies related to Native American consultation. Con: language
41 is inappropriately detailed for General Plan policies and does not result in
improvement to the element. This type of detailed consultation is addressed at
the project level, consistent with required mitigation.
Pro: expands discussion of historic preservation. Con: language is
42 inappropriately detailed for General Plan policies and does not result in
improvement to the element.
Pro: expands discussion of historic preservation. Con: language is
43 inappropriately detailed for General Plan policies, is not entirely correct, and
does not result in improvement to the element.

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- 44 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, is not entirely correct, addresses issues regulated by the Land Development Code, and does not result in improvement to the element.
- 45 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, is not entirely correct, addresses issues regulated by the Land Development Code and Guidelines, and does not result in improvement to the element.
- 46 Pro: would increase participation in of important stakeholders in planning and implementing historic surveys. Staff has made the proposed change to Policy HP-A.4b. Con: proposal identifies change to language specifically related to Native American involvement in archaeological studies. The language is inappropriately detailed for General Plan policies, is not entirely correct, addresses issues regulated by the Land Development Code and Guidelines, and does not result in improvement to the element.
- 47 Pro: proposed language is less ambiguous at beginning of sentence. Con: additional language is confusing, too detailed, and addresses issues regulated by the Land Development Code.
- 48 Pro: expands discussion of historic preservation. Con: additional language is too detailed, unnecessarily restrictive, and does not result in improvement to the element.
- 49 Pro: expands discussion of historic preservation. Con: additional language is too detailed, addresses issues regulated by the Land Development Code, and does not result in improvement to the element.
- 50 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, addresses issues regulated by the Land Development Code and Guidelines, and does not result in improvement to the element.
- 51 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, and does not result in improvement to the element.
- 52 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, and does not result in improvement to the element.
- 53 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, and does not result in improvement to the element.
- 54 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan policies, and does not result in improvement to the element.
- 55 Pro: would expand involvement of groups in historic preservation. Con: wording is awkward and out of place.
- 56 Pro: expands discussion of historic preservation. Con: language is inappropriately detailed for General Plan, wording is awkward and out of place, and does not result in improvement to the element.
- 57 Pro: may broaden protection of neighborhood character. Con: conservation areas do not retain sufficient historic integrity to be considered a historical resource and providing historical resources incentives would not be appropriate.

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and does not result in improvement to the element.
- 59 Pro: expands discussion of historic preservation. Con: language is
inappropriately detailed for General Plan policies, addresses issues regulated
by the Land Development Code and Guidelines, and does not result in
improvement to the element.
- 60 Pro: expands discussion of historic preservation. Con: language is
inappropriately detailed for General Plan, addresses issues regulated by the
Land Development Code and Guidelines, and does not result in improvement to
the element.
- 61 Pro: proposed language is less ambiguous.
- 62 Pro: proposed language has already been included in the element.
- 63 Pro: expands discussion of historic preservation. Con: wording is awkward and
out of place, and does not result in improvement to the element.
- 64 Pro: expands discussion of historic preservation. Con: language is
inappropriately detailed for General Plan policies, and does not result in
improvement to the element.
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inappropriately detailed for General Plan policies, and does not result in
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