Guidelines for
Preparing a Historic District Nomination
in Consultation with Staff

Implemented by the City of San Diego

City Planning & Community Investment Department

Urban Form Division

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INTRODUCTION

With the adoption of the General Plan update in March of 2008, the City acknowledged the importance of historic districts to the preservation of the unique character of San Diego; and reaffirmed its commitment to the establishment of new historic districts where concentrations of buildings, structures, sites, landscapes and objects are identified. The General Plan update also provides the opportunity for the identification of potential historic districts through policies that require the development of context statements and the completion of historic resource reconnaissance surveys.

As these surveys are completed and potential historic districts are identified, it is anticipated that community members and property owners wishing to preserve the historic character and quality of their neighborhoods will wish to pursue establishment of historic districts identified by the surveys. Because the surveys' resources will be limited to reconnaissance level work and will not include the intensive level survey work required to establish a historic district, it is also anticipated that community members and property owners will express interest in preparing and submitting historic district nominations rather than relying on the availability of limited City resources. These Historic District Nomination Guidelines have been prepared to encourage and facilitate community-lead efforts to survey and nominate historic districts.

These Guidelines do not establish new policy, but instead provide guidance within the framework of the adopted Historic District Policy on the process of preparing a nomination of a historic district previously identified by a reconnaissance survey. Proposed districts not previously identified as a potential historic district will first need to consult with HRB staff, prepare a context statement, and complete a reconnaissance survey consistent with the City's *Historic Resource Survey Manual* prior to initiating a nomination consistent with these Guidelines.

Proposed districts within an area previously surveyed but not identified as a potential historic district are unlikely to retain sufficient integrity to convey significance and would therefore not be eligible for designation as a historic district. Rare exceptions may be in cases where the resource type was not considered during the survey and/or where the resource type has achieved significance since the completion of the survey. Once again, these proposed districts will need to consult with HRB staff, prepare a context statement, and complete a reconnaissance survey consistent with the City's *Historic Resource Survey Manual* prior to initiating a nomination.

Finally, the information in these Guidelines is intended primarily for residential and, to a lesser extent, neighborhood-serving commercial areas. If a proposed district contains other types of properties or resources, please contact Historical Resources Board (HRB) staff for guidance.

GETTING STARTED

Reconnaissance vs. Intensive Surveys

In preparing a district nomination, it is important to understand the difference between the two types of historic resource surveys: **reconnaissance** and **intensive** level surveys. A reconnaissance survey includes a "once over" inspection of a community or neighborhood, and is

useful in characterizing resources in an area. Reconnaissance surveys are used to form the basis for more intensive, detailed survey efforts. During a reconnaissance survey, descriptive information about buildings, structure, and objects are collected and analyzed primarily through architecture and dates of construction. Potential historic districts may be identified as a result of a reconnaissance survey; however, a reconnaissance level survey does not involve a sufficient amount of research, documentation or evaluation to establish a historic district. Historic resource surveys completed in support of community plan updates will be completed at the reconnaissance level.

An intensive survey is designed to identify precisely and completely all historic resources in an area. It involves detailed background research and a thorough documentation of all historic properties in the field, and should produce enough information to evaluate historic properties and generate an inventory. Intensive level surveys are required to nominate a historic district for designation, and include a methodology, district-specific context statement, Statement of Significance, Period of Significance, boundary description and justification, and a parcel-by-parcel survey of each property within the district boundary which provides detailed analysis of the property and its integrity.

Applicant Team

Ideally, to ensure that submitted nominations are complete at the time of submittal and allow processing of nominations as efficiently as possible, a qualified historic consultant who meets the U.S. Secretary of the Interior's Professional Qualifications for architectural history or history would be retained to prepare the nomination. However, volunteers can be very effective in the preparation of district nominations under the supervision and training of a qualified historic consultant. Communities interested in preparing and submitting a historic district nomination through volunteer efforts should assemble a volunteer team and contract with a qualified historic consultant who meets the U.S. Secretary of the Interior's Professional Qualifications for architectural history or history (see "References") to provide guidance and training on the preparation of all aspects of the nomination, including:

- Research and development of the historic context statement;
- Developing the Statement of Significance;
- Establishment and justification of the Period of Significance;
- Establishment and justification of the district boundary; and
- Conducting intensive level survey work, including completion of architectural descriptions, identification of modifications and assessing integrity, and completing all survey forms correctly.

A list of qualified historic consultants can be found on the Historical Resources Board website.

STEP 1: Review of Technical Documents

Prior to conducting any archival research or initiating any survey work, the applicant team must review all applicable technical documents, including City policies, criteria and guidelines; National Register Bulletins; California Office of Historic Preservation (OHP) documents; and

prior context statements and surveys. These documents, which have also guided the preparation of this document, provide a foundation of sound preservation theory and practice related to the establishment of historic districts. (Weblinks to these documents have been provided in the "References" section of this document.)

"National Register Bulletin: Historic Residential Suburbs, Guidelines for Evaluation and Documentation for the National Register of Historic Places", 2002.

This Bulletin is an excellent, comprehensive resource for the evaluation and documentation of residential subdivisions. It provides an introduction to the concept of historic contexts and how to use them to evaluate eligibility for designation. It also provides an overview of suburbanization in the United States from 1830-1960 which can be used to place San Diego's development and the development of the subject subdivision into a broader historic context and perspective. Lastly, this Bulletin provides assistance with the identification, evaluation, documentation and registration of residential suburbs; including guidance on conducting research and developing a historic context, surveying properties within the proposed district boundaries, and evaluating the integrity and eligibility of the district and the resources within the district boundary. Although this Bulletin specifically addresses eligibility under National Register Criteria, the information and principles presented in this Bulletin can be applied to local adopted designation criteria. (More information on applying these principles to local designation criteria will be provided later.)

"National Register Bulletin: Defining Boundaries for National Register Properties", 1997(revised)

Although the district nomination is for local designation and not National Register listing, this bulletin provides excellent guidance on the selection and justification of district boundaries, which is critical to a successful district nomination. The principles in this bulletin can be applied easily to local designation criteria and the local district policy.

"Instructions for Recording Historical Resources" from the California Office of Historic Preservation, 1995.

District nominations must be prepared on California Department of Parks and Recreation (DPR) inventory forms. For most residential historic districts, a DPR-D (District Record) form will be required for the recordation of the district itself, and a DPR-A (Primary Record) form and DPR-B (Building, Structure and Object Record) form will be required for each property within the district boundary. This manual provides detailed instructions on the completion of these forms.

"Historical Resources Board Policy 4.1: Historical District Policy on Establishing Historical Districts", 2002.

The Historical Resources Board's adopted District Policy provides local district designation policy and the requirements for establishing a historic district.

"Guidelines for the Application of Historical Resources Board Designation Criteria" 2008.

The significance of a historic district must be established under local adopted HRB designation criteria. The Designation Criteria Guidelines assist with the understanding and application of each HRB designation criterion and explain the aspects of each criterion and how significance may be established.

"Guidelines for Preparing a Historic District Nomination in Consultation with Staff"

In addition to breaking down the nomination process into a logical and manageable sequence with regular review and oversight, this document is also intended to clarify the local application of the principles and procedures presented in the National Register Bulletins.

All available context statements and surveys applicable to the area in question.

The applicant must review all prior context statements and surveys applicable to the proposed district area. District nominations may only be submitted if a reconnaissance survey has been completed which identifies the proposed district as a potential historic district. The reconnaissance survey will provide a starting point for the applicant in the development of the context statement, Statement of Significance, Period of Significance, and classification of contributing and non-contributing resources required in a district nomination.

STEP 2: Prepare and Submit a District Nomination Proposal

The applicant team must complete and submit a District Nomination Proposal form with attachments for HRB staff review and comment. The purpose of the District Nomination Proposal is to make staff aware of the proposed district; to ensure that the proposed district has been previously identified by a reconnaissance survey; to identify the applicant team and the qualified historic consultant; and to establish a course of action for the applicant team through a draft Methodology.

The Nomination Proposal form can be obtained through the Historical Resources website and provides staff with the following information:

- Proposed District name
- Preliminary boundary description
- Names and contact information for the volunteers on the applicant team
- Names, contact information and resume for the qualified historic consultant who will supervise the nomination effort and provide training for the applicant team

The Nomination Proposal also consists of several attachments:

- Resume from the qualified historic consultant to verify that the selected consultant meets the U.S. Secretary of the Interior's Professional Qualifications in architectural history or history.

- A copy of the context statement, boundary description and DPR forms from all prior surveys that identified the subject area as a potential historic district. This information will be reviewed by staff to ensure that the district boundaries proposed by the applicant team reflect the district boundaries identified by the reconnaissance survey. Staff may provide some feedback and additional direction to the applicant team based on this information.
- A draft Methodology. A detailed draft Methodology provides the basis for the intensive level research and survey work involved in preparing a district nomination and will guide the survey effort. The Methodology should outline what is currently known about the proposed district area, as well as the work that will be undertaken for both archival and field research. The draft Methodology provides the structure for the survey, and will need to be revised as needed once the survey is complete to reflect the final survey effort. The draft Methodology must include the following elements:
    a. Project Objective: A clear statement regarding the purpose of the survey and how it is intended to be used.
    b. Explanation and justification of survey boundaries: Description of the boundaries and number of acres in the project area. The number of buildings to be surveyed should be noted.
    c. Technical documents reviewed as part of the survey preparation (i.e. City policies, criteria and guidelines; National Register Bulletins; California Office of Historic Preservation (OHP) documents; and prior context statements and surveys.)
    d. Brief description of the archival research techniques including:
        - Who will be conducting the archival research.
        - Research institutions to be utilized (i.e. Historical Society Archives, California Room and the Downtown San Diego Public Library, University of California San Diego (UCSD), San Diego State University (SDSU), University of San Diego (USD), South Coastal Information Center (SCIC), local community historical societies, etc.)
        - Primary research documents to be reviewed (i.e. original subdivision maps, Sanborn Fire Insurance maps, lot and block books, newspapers, deeds, directories, first-hand oral histories, etc.)
        - Secondary research documents to be reviewed (i.e. second-hand oral histories, Journal articles, prior intensive surveys for individual properties within the proposed district boundary, etc.)
    e. Brief description of the field survey methods, including:
        - Who will be conducting the field survey.
        - How the field survey will be conducted.
        - How the date of construction will be ascertained.
        - How the modifications to the individual properties will be identified.
        - How a property's significance to the district will be established.
        - How the integrity of a property will be evaluated.

Staff will review the Nomination Proposal and provide written feedback regarding the proposal, with a follow-up meeting with the applicant team and their consultant to answer questions and provide feedback. Revisions to the proposal may be necessary. At this time, staff will also informally poll property owners within the district boundary to get a sense of the level of support

for the district nomination. Once this process is complete, the applicant team may proceed to preparation of a district-specific context statement, Statement of Significance, Period of Significance, and a detailed boundary justification.

STEP 3: Conduct Intensive Level Research and Prepare a District Record Form (DPR-D)

Under the supervision of the qualified historic consultant, the applicant team must develop a district-specific context statement, Statement of Significance, Period of Significance, and detailed boundary description and justification. The information must be contained within a DPR-D District Record form (instructions for correctly completing this form can be found in the *Instructions for Recording Historical Resources* from the California Office of Historic Preservation).

Context Statement

A historic context is an organizational format that groups information about related historic properties, based on a theme, geographic limits and chronological period. A single historic context describes one or more aspects of the historic development of an area and identifies the significant patterns that individual properties represent. Historic contexts establish the themes and property types that are important in a community or neighborhood. Without an adequate historic context, surveys may fail to identify significant resources or contain biases.

Historic contexts are developed on the basis of archival research and background data on a community's history. The context statement prepared as part of the reconnaissance survey will provide the foundation for the development of the district-specific context statement, which should provide a context for the development of the proposed district and place it in the broader reconnaissance level context statement. The archival research design established in the draft Methodology will provide the framework for the research involved in developing a district-specific context statement. (More detailed information on context statements can be found in the National Register Bulletin on Historic Residential Suburbs.)

Research <u>not required</u> as part of the context statement (or the later field survey) includes detailed property history consisting of title searches or directory searches. This information is not typically required *unless* the district is being nominated under HRB Criterion B for an association with a historically significant individual or individuals, in which case the ownership and residency history of the properties within the district would be especially important.

Detailed Boundary Description and Justification

More often than not, the boundaries of a proposed historic district within a residential suburb will reflect the boundaries of the original underlying subdivision. However, this may not always be the case; especially in instances where the subdivision as a whole does not retain sufficient integrity for designation, or when the significant theme of the district is not related or tied to the underlying subdivision. In all cases, however, the applicant team must identify and justify the boundaries of the proposed district based upon the historic context and the significance of the district under adopted HRB designation criteria.

Statement of Significance and Period of Significance

In order for a proposed district to be eligible for designation, it must meet one or more of the following HRB designation criteria:

A. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development.
B. Is identified with persons or events significant in local, state or national history.
C. Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.
D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman.
E. Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the California State Office of Historic Preservation for listing on the California Register of Historical Resources.

Criterion F, which states that a resource must be “a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City” is applied to contributing resources within a historic district and is not used to establish the significance of the district itself.

The Statement of Significance must evaluate the historic context against the designation criteria to determine whether or not the district is significant under locally adopted designation criteria. Assistance with applying the designation criteria can be found in the *Guidelines for the Application of Historical Resources Board Designation Criteria.*

Lastly, the applicant team must identify the period of time which reflects the Statement of Significance. This is known as the Period of Significance. For instance, if a subdivision is significant for its representation of varying architectural styles over a period of time, the Period of Significance would likely span from the construction of the first house within the subdivision through the general build-out of the subdivision (when new development largely ceased, with a few in-fill exceptions). Or, if a proposed district is significant as the work of a Master Builder or Architect, the Period of Significance would reflect the years in which the Master Builder or Architect was designing and/or building homes within that district.

Staff will review the submittal and provide written feedback, with a follow-up meeting with the applicant team and their consultant to answer questions and provide feedback. Revisions to the submittal may be necessary. Once staff accepts the submittal, it will be docketed for review by the Policy Subcommittee. The Subcommittee will review the submittal (consisting of the district-specific context statement, Statement of Significance, Period of Significance, and detailed

boundary justification) as well as the DPR forms from the reconnaissance survey and will provide comment. Additional revisions based on this comment may be necessary.

Once the district-specific context statement, Statement of Significance, Period of Significance and detailed boundary description and justification are finaled, the applicant team may proceed with the field survey work. It should be noted that the field survey work will likely reveal additional information which may require additional research and could result in modifications to the Statement of Significance, Period of Significance and/or proposed boundary. This is typical during the intensive survey process. However, thorough research; a sound context statement; and a well justified Statement of Significance, Period of Significance and boundary are a crucial foundation for the field survey.

STEP 4: Conduct an Intensive Level Field Survey of the District

Surveys are typically conducted from the public right-of-way, street or alley. Access to private property is not required for most surveys. If access to private property is necessary, permission must be obtained from the property owner. As the intensive field survey begins, staff will mail a letter to all property owners reminding them of the district nomination effort and informing them that the survey is underway. Answers to frequently asked questions regarding district designation will be provided, and property owners will be invited to submit any relevant information regarding their property.

Under the supervision and training of a qualified historic consultant, an intensive level field survey of all properties within the district boundary must be completed using DPR-A (Primary Record) and DPR-B (Building, Structure and Object Record) forms (instructions for correctly completing these forms can be found in the *Instructions for Recording Historical Resources* from the California Office of Historic Preservation). The applicant team will be required to complete all fields within DPR-A and DPR-B forms, unless specifically stated otherwise in these Guidelines. Fields not required include the NRHP Status Code and the Historic Name. Status Codes will be assigned by staff once the nomination is processed. The historic name of the property is not applicable because the HRB's adopted Resource Naming Policy states that properties within a designated historic district shall be identified as a contributing or non-contributing resource to that district, and not by the historic name.

When conducting an intensive field survey, the integrity of each property within the district must be assessed. In order to assess the integrity of a property, all modifications must be accurately identified. Modifications to individual properties surveyed must be identified in detail in section B.6 of the Building, Structure and Object Record (BSOR). Many modifications can be identified on sight. Other modifications may require more research and analysis to accurately identify. Modifications to properties can be identified through permit searches at the City of San Diego Development Services Department Records Section; Residential Building records at the County Assessor's Office; and through Sanborn Map analysis (see "references"). All of these resources should be consulted when identifying modifications and assessing a building's integrity.

Once the modifications are identified, the impact of those modifications on the building's ability to convey the significance of the district must be analyzed. The National Park Service identifies

seven aspects of integrity (discussed in the "National Register Bulletin on Historic Residential Suburbs" and "National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation":

- Location: the place where the historic property was constructed or the place where the historic event occurred.
- Design: the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting: the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role.
- Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling: a property's expression of the aesthetic or historic sense of a particular period of time.
- Association: the direct link between an important historic event or person and a historic property.

Location, design, setting and feeling are important aspects of integrity for the district as a whole. Aspects of design, materials and workmanship are better examined at a property-by-property level. For instance, if the proposed district is significant as an embodiment of distinctive characteristics of Craftsman and Spanish architecture, all contributing properties within the district boundaries must retain sufficient integrity of design, materials and workmanship that characterize Craftsman and Spanish architecture within the Period of Significance.

Finally, once the survey is complete, the applicant must group the DPR-A and DPR-B forms first by contributing and non-contributing resources, and then alpha-numerically by street within those two categories. Contributing resources are those resources which were built within the period of significance, are reflective of and contribute to the significance of the district, and retain sufficient integrity to convey that significance. Contributing resources typically include buildings and structures, but may include landscaping, trees, and streetscapes (palm trees, parkways, sidewalk color and scoring, stamps and curb cuts) which are characteristic of the period of significance and architectural design. Non-contributing resources are those resources which either were built outside of the period of significance and are therefore not eligible for designation as part of the district; or were built within the period of significance but have been altered to such an extent that they no longer retain sufficient integrity to convey the significance of the district.

The applicant team will also be required to submit a spreadsheet or database which summarizes the field survey data. The template will be provided by staff and completed by the applicant team. Staff will review the submittal and provide written feedback, with a follow-up meeting with the applicant team and their consultant to answer questions and provide feedback. Revisions to the field survey may be necessary. Once staff accepts the field survey, the applicant will be required to provide a complete nomination consisting of a final Methodology; the DPR-D District Record form (containing the context statement, Statement of Significance, Period of

Significance, and detailed boundary description and justification); and the intensive level survey (DPR-A and DPR-B forms for all properties within the district boundary and associated spreadsheet). The applicant will be required to provide a hard copy and an electronic copy (MS Word) of the complete nomination.

STEP 5: City Processing

Once the nomination has been accepted by the City, it will be processed consistent with the adopted Historic District Policy. Currently, the adopted Historic District Policy requires the following to process a historic district nomination:

- A City-sponsored workshop for property owners and residents within the district boundary to present the nomination and answer questions regarding historic district designation.
- A petition signed by a substantial number or a majority of the property owners within the district in support of the nomination. Based on prior experience staff has modified this requirement from a simple applicant-circulated petition to a mail-balloting effort coordinated and controlled by the City. The balloting effort will follow the workshop and precede any hearings before the full HRB.
- First Hearing by the HRB. At this hearing the Board reviews the nomination to ensure that it is complete and ready for a designation hearing. If the nomination is complete, it will be forwarded to a second hearing by the full HRB to consider designation.
- Second Hearing by the HRB. At this hearing the Board reviews the nomination and takes action on the designation of the district. If the district is designated, that designation becomes final 10 business days from the date of the designation once the appeal period is over.