



Wednesday, April 27, 2016

San Diego City Planning Department
Historical Resources Board (HRB) Staff
1010 Second Avenue, Suite 1200
San Diego, CA 92101

HRB Staff,

Save Our Heritage Organisation (SOHO) appreciates the progress made toward interim protections for the potential historic districts and believes the overlay zone strategy is a potential solution. However, there are several concerns, noted below, that still require internal vetting. Although SOHO is not opposed to the overlay district strategy, until these concerns are addressed, SOHO is not able to support this strategy.

1. Inadequate Protections – Due to the list of “Exemptions from a Building Permit (§129.0203),” the proposed overlay district regulations do not adequately protect historic resources from the installation of replacement doors and windows when placed within the same opening, because no permit is required. This is detrimental to the potential district, could render the historic asset no longer contributing or eligible for a district, and is the same problem for buildings undergoing 45-year review.

2. Infill - To effectively protect the potential district from inappropriate change, infill guidelines, stated within the ordinance, must address compatible scale, bulk (including the underlying lot size), rhythm, and materials.

3. Not Included & Non-Inclusive Districts – Multiple property listings (MPLs), community identified districts, and commercial/mixed-use properties, such as the Hillcrest Commercial District, must receive a reconnaissance survey and be included in the overlay zone. *This is in the best interest of the City and the potential district to be transparent for those interested to develop in these areas.* Bungalow courts are essentially their own district and should be included within the overlay zone to protect these collections as a group.

4. Enforcement - This ordinance needs adequate enforceable protections for the potential districts. How will this be adequately enforced to ensure there is not a loss of historic fabric, rendering buildings no longer contributing? Is there an alternative solution?

5. Obtrusive Changes – The term “original footprint” is not explicit enough and could lead to trivial disputes. Second, the 2/3 rule does not adequately protect corner properties and will facilitate obtrusive and odd-shaped rear additions, which will be detrimental to the

BOARD OF DIRECTORS

Jaye MacAskill, President • David Goldberg, Vice President • Jessica McGee, Treasurer • John Eisenhart, Secretary
M. Wayne Donaldson • Erik Hanson • Paul Johnson • Nancy Moors • John Rush • Scott Sandel • Sandor Shapery • Kiley Wallace • Elizabeth Weems
Bruce Coons, Executive Director

potential district and could render the historic asset no longer contributing or eligible for a district.

Thank you for the opportunity to comment,

A handwritten signature in black ink, appearing to read "Bruce Coons". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bruce Coons
Executive Director
Save Our Heritage Organisation

Cc: Susan Brandt-Hawley, Brandt-Hawley Law Group