



Save Our Heritage Organisation  
Protecting San Diego's architectural and cultural heritage since 1969

Tuesday, February 19, 2019

Anna McPherson & Gary Geiler - Development Services Department  
City of San Diego  
1222 First Avenue  
San Diego, CA 92101

Re: Procedural changes to established 45-year review process

Ms. McPherson and Mr. Geiler,

Save Our Heritage Organisation (SOHO) requests a meeting to discuss the prior 45-year review procedure, the community process that led to that procedure, and recent issues due to the changes made in this procedure.

A discretionary review process under CEQA, the recent changes to this process violate the prior public agreement, which vested community stakeholders, including SOHO, agreed to approximately 10 years ago. Developed through a series of monthly meetings (that included Kelley Stanco) to ensure that every discretionary decision made by the city about potential historical resources would not require the preparation of an EIR—instead of forcing the law, the City, SOHO and community stakeholders were able to come up with an alternative, less onerous process. Upon developing this procedure collaboratively, the public was comfortable with the city pursuing discretionary decisions under CEQA given that the public would be notified in a timely manner to offer comments, provided with a photo and location of the resource, and notified again if a resource that received comments was cleared by staff. However, the revised process makes it difficult to get meaningful public input for the specific reasons detailed below.

- There is no posting date;
- The community plan area is not identified;
- There are no building photographs;
- The submittal of a historic report is not identified; and
- There is shortened turn around period of 5 days.

The regulation itself states that the city must take public input from knowledgeable persons in the community; however, revisions to this procedure—arbitrarily changed without any public engagement—make providing quick responses increasingly difficult. And for public comments to be useful to city staff, then photos, more response time, and a community plan area are necessary, especially if a report has been submitted. Additionally, receiving input from the public often helps to back up the city staff's position, serving as a safeguard to how the city determines buildings significant or not, which also helps avoid legal ramifications.

SOHO requests a meeting at your earliest convenience, which should also include other public stakeholders, to address these concerns and resolve these procedural issues.

Thank you,

Bruce Coons  
Executive Director  
Save Our Heritage Organisation