



# Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

October 11, 2025

Policy Subcommittee of the Historic Resources Board  
C/O Kelley Stanco, Deputy Director  
Environmental Policy & Public Spaces Division  
City of San Diego, City Planning Department  
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## **Re: HRB Policy Subcommittee Meeting – October 13, 2025 Preservation and Progress Package A**

Dear Chair Byers and Members of the Policy Subcommittee,

SOHO submits these comments regarding the City's Preservation and Progress Initiative—specifically the proposed designation appeals process and the continued inclusion of the supermajority vote requirement for historic designations.

SOHO has major concerns regarding the proposed changes to the historic designation appeal process in the Municipal Code. As written, these changes create an unfair, one-sided system: only property owners could appeal a decision not to designate a historic resource. All others—community groups, applicants, historians, or interested citizens—would lose that right. That is neither fair nor consistent with the City's stated principles of public participation.

In practice, this means that if a deserving property is wrongly denied historic status, the applicant who invested time and money researching and nominating it would have no way to appeal. Only the property owner, who may oppose designation could do so.

This approach not only favors developers and property owners but also removes the community's ability to ensure that potential historic resources aren't lost through error or bias.

The City's justification that this change would "reduce misuse and delays" does not hold up. There is no evidence that appeals of non-designations have ever been abused.

The proposal contradicts the City's goals of equity and transparency. The Land Development Code states its purpose is to "facilitate fair and effective decision-making and to encourage public participation." The Preservation and Progress Initiative similarly call for an equitable process. Limiting who may appeal does the opposite—it excludes the public and grants one group special treatment.

We do support the provision giving appellants 90 days to submit supporting information. However, once that window closes, no new information should be accepted. This would prevent "last-minute surprises" and keep the process transparent and consistent for everyone involved.

Finally, the proposed new “grounds for appeal” would allow City Council to override the HRB’s professional judgment. Adding vague new language permitting appeals based on “other considerations” invites political influence into what should remain an objective, fact-based process. This would weaken the integrity of the HRB’s role and the credibility of historic preservation in San Diego.

We recommend and request the removal of the supermajority vote requirement. This rule, requiring six out of nine votes for a property to be designated has prevented countless eligible and significant historic sites from being protected. With the proposed changes allowing only property owners to appeal non-designations, retaining the supermajority rule would make it even harder to safeguard San Diego’s historic resources.

We contend that the supermajority rule keeps San Diego out of step with nearly every other major California city and builds inequity into our preservation process. As no other major California city requires a supermajority vote to designate historic resources. Neither the State Office of Historic Preservation nor the National Park Service recommends such a requirement for local designation.

The existing process already includes staff research and analysis, a professionally qualified board, public hearings, public comment and opportunities for appeal. These layers of review ensure fairness and accuracy without the need for a supermajority.

The current rule allows a small minority to block designations—even when a clear majority and staff agree that a site is significant. This has happened repeatedly, especially when one or two board members are absent.

Important resources have slipped through the cracks simply because not enough members were present, not because the properties didn’t qualify. The rule contradicts the City’s stated goals of fairness and public participation. Both the Land Development Code and the Preservation and Progress Initiative emphasize equity and access, yet this rule penalizes qualified nominations and undermines public trust and lessens equity.

These two issues diminish and weaken the role of HRB members, undermining the integrity of their professional expertise and public service. SOHO urges the Policy Subcommittee to remove the supermajority requirement and to preserve a balanced, transparent appeals process that allows full public participation. These changes are essential to maintaining fairness, credibility, and trust in the City’s preservation program.

Thank you for the opportunity to comment,

A handwritten signature in black ink, appearing to read "Bruce Coons", with a long horizontal flourish extending to the right.

Bruce Coons  
Executive Director  
Save Our Heritage Organisation (SOHO)  
San Diego, California