



# Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

June 25, 2025

Kelley Stanco Deputy Director  
Environmental Policy & Public Spaces Division  
City of San Diego City Planning Department  
9485 Aero Drive, MS 413  
San Diego, CA 92123

## **RE: Recommendations and Reform Requests for the Preservation and Progress initiative**

Dear Deputy Director Stanco,

Save Our Heritage Organisation (SOHO) wishes to express our appreciation of the City's efforts over the years that reflect a longstanding commitment to historic preservation. In the spirit of our shared purpose and in anticipation of the positive changes that can result from the City's Preservation and Progress initiative, we are submitting the following recommendations and reform requests that are aligned with the City's goals of equity, sustainability, and efficiency as well as the San Diego preservation community's long-term stated objectives.

These recommendations and reform request emerge from the lived experiences of our communities, the insights of local stakeholders, and the extensive professional knowledge cultivated over decades by preservation experts. We recognize the dedication and experience of City staff and believe that, together, we can advance reforms that reflect the highest standards and goals of historic preservation.

We offer these in the spirit of partnership, with the shared goal of shaping a preservation program that is equitable, effective, and rooted in community values. Our intent is to offer a constructive and expert-driven path forward—one that strengthens protections, improves processes, and ensures that the historic character of San Diego continues to thrive for generations to come.

### **I. Invest in Older Building Stock to Help Alleviate the Affordable Housing Crisis**

Preserving and reusing older and historic buildings is a critical strategy for addressing housing affordability. We recommend the following actions:

- **Adopt a Citywide Adaptive Reuse Ordinance**  
Apply to buildings built in or before 1975, with a focus on sustainable development areas. Prioritize creative reuse and relocation over demolition and establish a proactive framework that removes barriers to adaptive reuse. Elevate reuse as a core strategy to meet the City's climate action, housing, and cultural preservation goals. Align with landfill diversion targets, incentivize reclaimed and historically

compatible materials, and promote form-based codes for context-sensitive infill. Expand grants, fee waivers, and expedited review for projects that retain and repurpose historic structures. Embedding these tools into policy shifts the City from reactive decisions to a sustainable approach that strengthens neighborhoods and protects the environment.

- **Preserve Naturally Occurring Affordable Housing (NOAH)**  
Identify and document below-market-rate housing and incentivize its reinvestment and reuse over demolition. Much of our older housing stock is NOAH—affordable without public subsidy—and serves low- to moderate-income households, playing a key role in housing stability.
- **Redirect growth to underutilized, non-character-defining properties**  
Encourage redevelopment of postwar strip malls and office parks—often on large, transit-accessible lots—while preserving the character of established residential neighborhoods.
- **Incentivize retention of older single-family homes**, including those eligible for historic designation to create ownership opportunities.

## II. Enhancing Participation and Efficiency in Preservation Processes

We support the overarching goals of improving the processing of historic resources, maximizing staff productivity, making preservation more equitable, and advancing community-based planning. The following reforms are essential:

- **Streamline the local designation of State and National Register Historic Districts**  
Amend HRB Policy 4.1 and the HRB Guidelines to establish a clear, expedited process for locally designating districts already listed in the California or National Registers. These districts have already undergone rigorous evaluation, and their local designation should reflect that status with a streamlined procedure that avoids unnecessary duplication, reduces delays, and ensures timely protection. This would also reinforce community planning goals, enhance access to preservation incentives, and ensure meaningful protections are in place to safeguard neighborhood character and cultural heritage.
- **Unclog the Historic District Designation Queue**  
To address this critical backlog, the City must streamline internal review processes and establish clear timelines and accountability measures for advancing district nominations. San Diego has not approved a local historic district since 2017, despite more than a dozen districts currently awaiting action—many of which have broad community support and meet established eligibility criteria. This creates serious CEQA vulnerabilities, as unprotected historic districts are at increased risk of piecemeal demolition and incompatible development without environmental review. It also undermines the City’s planning consistency, particularly in communities identified in community plans and historic surveys as having valuable historic fabric.
- **Allow nominations from the public for and streamline the designation of historic districts**
- **Systematize Adaptive Reuse**  
As noted in Section I, adaptive reuse should be embedded into preservation and equity planning through streamlined ordinances and incentives.
- **Provide timely and simplified permitting** for homeowners in historic districts by fixing permit delays for contributing homeowners, and by providing expedited processing for routine alterations that conform to district standards.
- **Increase public and community participation** in historic resource identification and decision-making.
  - Empower Historic Districts to establish district-specific design guidelines, with objective design standards and referencing Secretary of Interior Standards.
  - Pre-screen proposed projects with local historic district groups prior to HR staff review

- **Leverage Community Plan Updates (CPU) and adoption of historic districts to:**
  - Develop enforceable design standards
  - Streamline compatible projects
  - Reduce Planning Department workload

### III. Advance Equity in Historic Preservation

We strongly support the City’s stated goal of advancing equity in historic preservation, by building equity into every aspect of preservation—from survey and designation to rehabilitation and reuse—San Diego can ensure that the benefits of preservation are shared across all communities.

#### Expand and Promote the Mills Act

A more inclusive and accessible Mills Act program will encourage proper rehabilitation, support long-term affordability and promote equity in San Diego’s preservation efforts.

- Ensure the continued availability of the Mills Act and expand access to homeowners in newly designated and historically under-served districts—especially communities of color and lower-income neighborhoods. Allow the designation of unrestored and altered properties so they may utilize the Mills Act for restoration. Allow use of Mills Act funds for necessary home restoration consistent with the program’s intent. Pair this expansion with targeted outreach, education, and technical assistance to raise awareness and support applications.
- Simplify the process by offering translation services, workshops, and one-on-one guidance through trusted community partners.

#### Equity Incentive Toolkit

To further support equitable access to historic preservation benefits, especially for low- and middle-income property owners and historically underrepresented communities, we recommend the inclusion of the following incentives. Establish a Preservation Assistance Program that offers grants, low-interest loans, and hands-on technical guidance to help homeowners maintain and rehabilitate historic properties in line with the Secretary of the Interior’s Standards for Rehabilitation.

- **Streamline the nomination process** by introducing income-based fee waivers or reductions and a fast-track program for qualifying properties in underserved communities.
- **As noted in Section I, adaptive reuse** should be embedded into preservation and equity planning through streamlined ordinances and incentives
- **Fee Waivers**  
Waive application and permit fees associated with historic designation, Mills Act participation, and related approvals for under-served homeowners to remove financial barriers to preservation.
- **Access to Architectural Services**  
Provide pro bono or subsidized architectural consulting services to assist eligible property owners in the preservation, rehabilitation, and restoration of their historic homes.
- **Nomination Assistance for Lower-Income Residents**  
Offer free technical assistance to prepare and submit historic designation nominations for eligible properties and districts, ensuring more inclusive representation in the local register.
- **Expanded Eligibility for Altered Yet Significant Properties**  
Allow designation of properties historically underserved communities that retain historical significance, even if they have experienced alterations over time due to financial hardship or cultural tradition

and practices. This policy would acknowledge the realities of preservation in historically underserved communities and help prevent further loss.

- **Waiver of Disposal (Dump) Fees**  
Eliminate or reduce disposal and dump fees associated with rehabilitation projects on designated properties or community-based preservation efforts.
- **Offer targeted incentives to developers** who retain and sensitively rehabilitate historic structures rather than demolish them.
- **Establish a Preservation Assistance Program** that offers grants, low-interest loans, and hands-on technical guidance to help homeowners maintain and rehabilitate historic properties in line with the Secretary of the Interior’s Standards for Rehabilitation
- **Create mentorship networks and volunteer contractor programs** that connect experienced preservation professionals, tradespeople, and students with property owners needing assistance—strengthening local capacity and passing on traditional building skills.
- **As noted in Section I, adaptive reuse** should be embedded into preservation and equity planning.

#### IV. Process Improvements

To ensure San Diego fulfills its responsibilities as a Certified Local Government (CLG) and as a city committed to inclusive, efficient planning, we recommend:

- **Abolish the supermajority vote** for historic designations. Designation decisions need to rely on a simple majority vote like all other city of San Diego Council committees do.
- **Depoliticize historic preservation**
  - Align historic designation criteria with the National Park Service criteria but tailored to local conditions and cultural significance.
  - Require all Historic Resources Board (HRB) members to hold relevant qualifications, for professional as well as nonprofessionals such as historic property owners, to show a “demonstrated interest and background in historic preservation.”
  - Provide training mandated by the CLG program.

#### Eliminate the 45-Year Review Through Comprehensive Surveying

Complete citywide historic resource surveys and process the resulting district and individual designation recommendations. This proactive approach will eliminate the need for the inefficient 45-year review process and provide certainty to the city, residents, preservationists and developers. This would greatly reduce workloads for all participants. A mechanism could also be established to regularly update survey data and recommendations as new information becomes available. 45-year review could not be eliminated until the comprehensive surveys are completed.

#### Window Permitting Reform Serving Equity and Protections

This is one of the most critical reforms needed to ensure integrity to the City’s preservation program. The current permitting policy regarding window replacements significantly undermines the protection and potential designation of historic resources.

- **The city must require permits for all new window replacements and installations, regardless of whether the opening is altered.** The wholesale replacement of historic windows—often with incompatible materials and designs—has become one of the most common causes of integrity loss in potentially significant properties. This practice directly contradicts the Secretary of the Interior’s Standards, particularly

Standard 6, which calls for repair rather than replacement and mandates that, when replacement is necessary, the new features must match the old in design, color, texture, and materials.

- **If the City elects not to require such permits, it must adopt a clear policy** that non-permitted window replacements do not disqualify a property from historic designation. Integrity evaluations should prioritize form, setting, and context, in keeping with national preservation guidance, rather than penalizing properties for alterations that occurred due to regulatory gaps or homeowner misinformation.
- **An equitable enforcement framework should be developed, applying differentiated standards for low-income homeowners.** This aligns with the Secretary’s guidance on preservation planning and treatment, which encourages flexibility and community sensitivity, while still striving to retain and preserve historic materials wherever possible. By realigning the City’s policy with the Secretary of the Interior’s Standards, this reform will ensure that historic resources—especially in underrepresented neighborhoods—are not irreversibly compromised.

We respectfully urge the City to embrace these solutions as essential elements of a more effective and inclusive preservation program. We look forward to working together as committed partners to help realize these reforms and strengthen San Diego’s stewardship of its historic and cultural resources. We have further suggestions and ideas more easily shared in person as they require active feedback.

Sincerely,

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

Bruce Coons  
Executive Director  
Save Our Heritage Organisation (SOHO)