



University Heights Historical Society

October 25, 2023

City of San Diego
Historical Resources Board
202 C Street, San Diego, CA 92101

RE: Meeting date 10/26/23, Agenda item 1, Report from the Office of the Independent Budget Analyst

Dear Chair and Members of the Board:

On behalf of the University Heights Historical Society, we agree with the analysis of the Neighborhood Historic Preservation Coalition (NHPC).

Specifically, we oppose Recommendations 1, 5, and 6, which are flawed and short-sighted and represent serious threats to San Diego's current and future historic sites. We support Recommendations 2, 3, 4, and 7, which will provide more certainty to homeowners, developers, and preservationists, and expand opportunities for affordable home ownership to first time homebuyers.

Recommendation 7 regarding adaptive reuse of historical resources, has been long overlooked by the City as a tool to preserve the supply of Naturally Occurring Affordable Housing (NOAH). As stated in the ["2020 Report of the San Diego Housing Commission on Preserving Affordable Housing in the City of San Diego"](#), *"San Diego cannot solely rely on new construction of housing units to mitigate the housing affordability crisis the City faces; this necessitates a robust preservation strategy."*

We wholeheartedly support the Housing Commission Report recommendation to *"Provide developer incentives for preservation and adaptive reuse of homes and properties in older neighborhoods where so much "Naturally Occurring Affordable Housing" (NOAH) already exists."*

We also support the NHPC recommendation to adopt an adaptive reuse ordinance *"to facilitate rehabilitation of historic properties to provide affordable housing. Such a program could allow for an expedited permitting process and allow developers to take advantage of various tax programs."*

The National Trust for Historic Preservation describes five case studies featuring best practices for adaptive reuse in its 2017 Report, ["Untapped Potential: Strategies for Revitalization and Reuse."](#) One of these case studies describes the Adaptive Reuse Ordinance adopted by the City of Los Angeles in 1999. This ordinance has helped to facilitate conversion of many historic and underutilized buildings, resulting in more than 14,000 new housing units.

Adaptive reuse of older properties is well documented as an effective tool to preserve Naturally Occurring Affordable Housing. We applaud the IBA and the Housing Commission for recognizing its importance and urge the Historical Resources Board to recommend codifying its use.

Sincerely,



**University Heights
Historical Society**

Kristin Harms, President