



November 12, 2020

Dr. David Ready, City Manager
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

Dear Dr. Ready,

The recent changes made to Palm Springs Municipal Code Chapter 8.05 were intended to improve the city's historic preservation program by (1) better defining building "integrity," and (2) correcting a citywide problem of owners modifying their properties so extensively as to constitute *de facto* demolitions. We supported these laudable goals.

Unfortunately, while revising the ordinance, there was some seemingly arbitrary "tinkering" with the ordinance. These modifications, though likely well-intentioned, showed a lack of appreciation of two important principles contained in the previous ordinance.

The two deficiencies created by modifications made in the new ordinance are:

- Only the property owner, their representative, or in special cases the city, have standing to submit a historic resource application (see PSMC Chapter 8.05.070(A)(1) & (2)). Previously "any person" could apply, an enlightened and democratic approach.
- A requirement for a "letter of property owner consent" is now part of the historic resource application (see PSMC Chapter 8.05070(A)(3)(c)). Applications made without such an owner's letter are deemed "incomplete" and not processed. The previous ordinance had no such administrative requirement and while an owner's desires were considered, applications were largely evaluated on their merits.

The previous preservation ordinance served the city very well for decades and paved the way for important properties (e.g., the Town & Country Center, Tahquitz Plaza, La Serena Villas, and the J. W. Robinson's Department Store Building) to be designated as historic resources.

Please change the preservation ordinance to allow for any person to submit a historic resource application with, or without, an owner's letter of consent.

If you have any questions, please contact me or PSPF board member Ron Marshall at info@pspreservationfoundation.org.

Sincerely,

President

Copies to: Chair, Historic Site Preservation Board & Director, Planning Services Department