

Attachment I



To: City of Redlands Historic and Scenic Preservation Commission
From: BCR Consulting LLC, Kara Brunzell and David Brunzell
Date: October 14, 2020
Subject: Supplemental Memo to Cultural Resources Assessment and Historical Resources Evaluation 301 West Palm Avenue, City of Redlands, San Bernardino County, California

BCR Consulting LLC (BCR Consulting) is presenting this Supplemental Memo to *Cultural Resources Assessment and Historical Resources Evaluation 301 West Palm Avenue, City of Redlands, San Bernardino County, California* dated July 16, 2020. This memo is intended to address comments offered during the City of Redlands Historic and Scenic Preservation Commission October 1, 2020 meeting.

The City of Redlands Historic and Scenic Preservation Commission is charged by the City with advising the “City Council on recommendations, decisions, and determinations concerning the designation, preservation, protection, enhancement, and perpetuation of historical, scenic, and cultural resources that contribute to the culture and aesthetic value of the City.” Its October 1, 2020 meeting was undertaken (in part) to discuss the Cultural Resource Assessment (CRA) prepared by BCR consulting and to “provide a recommendation to the Planning Commission on whether these documents adequately identify all impacts to cultural and historic resources and include adequate mitigation measures to mitigate all identified impacts to a level of less-than-significant.”

Staff briefly summarized the conclusions of the CRA and Commissioners then discussed the proposed project and the staff summary. It is important to note that the staff presentation provided a shorthand synopsis based on a table that was intended to assist the reader in comprehending the document’s complex content. The summary provided by staff is not a substitute for an understanding of the CRA as a whole. Therefore, we have provided the following emphases, clarifications, and reiterations of the CRA’s contents to be entered into the public discussion.

Historic District Definition

The CRA utilized the California Department of Park and Recreation (DPR) 523 D form to evaluate the property for California Register of Historical Resources listing eligibility (i.e. significance under CEQA) as well as for local listing. The property consists of a historic citrus estate comprising two residential buildings, a carriage house, a gravity-fed irrigation system, a concrete irrigation weir, a concrete incinerator, and historic landscape featuring stone masonry curbing, palms, and orange groves. Non-contributing features include a utilitarian grove barn, a stone masonry footing/fence along the property line, and a detached garage near the cottage. The term “district” raised questions at the meeting and is apparently the source of some confusion.

California’s Office of Historic Preservation (OHP) classifies five types of historical resources: buildings, structures, objects, sites, and districts. A district “possesses a significant

concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development” (California SHPO 1995). Thus “district” is the most accurate classification for a property consisting of multiple distinct resources that are linked both spatially and by historical development. Professional practice in historic preservation (led in California by OHP) has moved from a landmark-oriented evaluation to evaluation within historic context and the closely-related professional practice of documenting multiple resources as districts. A historic landscape such as the one present here also fits better into the definition of a district and is more easily recorded on the district forms.

For these reasons, the preparers chose to document this property as a district. The term “district” however is descriptive in nature and is simply meant to note the presence of multiple related resources. Although commissioners suggested that using the district category creates special burdens for property owners, the word “district” confers no special status on a property as a historical resource. Although the use of the district category was in my opinion the best professional practice for this property, it could have been evaluated as individual buildings, structures, and objects and such an evaluation would be equally valid.

Character-defining and Contributing Features of the Property

The following character-defining features of historic Redlands citrus estates were developed in the CRA based on comparative review:

- Five to ten-acre orange grove providing an aesthetic setting for a rural-residential estate
- Unique architect-designed house
- House visually prominent 50-200 feet from the public right of way
- Long driveway that provided an impressive vista
- A row of palms, eucalyptus trees, or hedges at the property boundary
- formal garden planted with exotic ornamental shrubs and trees as immediate setting of house
- Barn and/or carriage house
- Additional outbuildings located behind the house.

Character-defining/contributing features of the England/Attwood Estate as detailed in the CRA are as follows:

- Main residence, Prairie-style remodel by renowned local builder Garrett Huizing c1914
- Queen Anne-style cottage on Alvarado Street (architect J. Lee Burton)
- Ornate carriage house (architect J. Lee Burton)
- Spatial layout typical of Redlands citrus estates
- Historic landscape with multiple features:
 - Palms and cut-granite curbing at property borders
 - Formal semi-circular drive leading to house
 - Formal plantings enclosed by drive providing immediate setting for main house
 - Orange grove
 - Gravity-flow irrigation system
 - Concrete incinerator

Non-contributing features:

- Grove barn (c1908, alteration dates unknown) lacks significance

- Boundary footing/fence (unknown) lacks significance, altered outside the historic period
- Garage (1942, vehicle door replaced after 1990) constructed outside period of significance, altered outside the historic period
- Shed north of carriage house (unknown) lacks significance
- Treehouse near cottage (unknown) non-historic period

Historic Setting and Impact Assessment

During the meeting, the Commission characterized the grove as the most important feature of the property and indicated that groves define Redlands. The grove was described as older than the main house because of the c1914 remodel. No evidence or local precedents were cited. No methodological errors in the CRA were pointed out, and no new facts about the property were brought to light.

The CRA was prepared by experienced consultants who meet the Secretary of Interior's Standards for History and Architectural History, peer reviewed by a second firm with similar qualifications, and substantially edited in response to comments. Recommendations were informed by accepted professional standards as well as by CEQA's requirement to base findings on substantial evidence.

The CRA identified five major contributing elements to the property (see above): the three buildings, the historic landscape, and the character-defining spatial relationship between all the major and minor elements of the site. The historic landscape is the most complex contributing element and comprises multiple features: palms and cut-granite curbing along street-facing property borders, semi-circular drive, plantings enclosed by drive that provide the immediate setting for main house, orange grove, gravity-flow irrigation system, concrete incinerator.

Hierarchies of significance are problematic and difficult to define, but CEQA and the Secretary of Interior's Standards both focus on preservation of features that are highly visible and deemphasize rear facades, interiors, etc. The elements of the historic landscape closest to the buildings are essential to the historic setting of the buildings and also happen to be highly visible from the public right of way. Therefore, the palms, curbs, landscaping in front of the main house, northern portion of the orchard, and historic drive are much more important than the incinerator, weir, or portions of the grove near the rear of the property.

As discussed at much greater length in the CRA, the orange grove on the site is an important element of this landscape and is both historically and aesthetically significant. Elevation of this one element of the property above its other major features does not allow for an accurate fact-based assessment of the multi-faceted nature of this historic citrus estate. As the bullet points and discussion above demonstrate, the grove is just one of many historic features. Like the other features of this property, the significance of the grove is derived from its relationship to the estate as a whole. It is an important element of the estate, but it is not the informing spirit of the entire property. Furthermore, relative age does not make one element more significant than an element that was developed later within the period of significance. Additionally, features such as the carriage house and cottage are as old as the grove.

Setting is one of the seven aspects of integrity and thus extremely important to a property's ability to convey its historical significance. As stated in the Secretary of Interior's Standards

“most properties change over time” and many elements of this historic citrus estate have also changed over its 120 years of existence. A beloved Redlands landmark, A.K. Smiley Public Library, provides a relevant example of how integrity of a historic property in Redlands should be properly assessed. The immediate setting of the library grounds has been radically altered with the integration of the original path just north of the library (and within the original grounds) into the downtown vehicle grid. Over the second half of the twentieth century it was paved, widened, and its landscaped borders converted to automobile parking. Contemporary light standards, book drops, handrails, parking signs, striping, curb cuts, and power lines are also clearly visible in front of the library’s main façade. Yet the library, with its profuse architectural details and remnants of its original garden setting, maintains its ability to convey its historic identity in spite of these obvious negative impacts to its historic setting.

The proposed removal of a portion of the England/Attwood grove and the historic irrigation weir is closely analogous to the treatment of the Smiley Library. Loss of a portion of the trees undeniably has a negative impact on setting. However, this loss must be looked at in the context of preservation of three architecturally significant buildings and their spatial relationships as well as the most highly visible elements of the historic setting near the buildings. For these reasons, in my professional opinion (supported by a qualified peer review) the proposed project is an adverse change, but one that allows the property to continue to convey all seven aspects of integrity and thus does not constitute a substantial adverse change under CEQA and therefore, also does not have a significant effect on the environment, both within the meaning of CEQA Guidelines Section 15064.5(b). It is notable that the Redlands Conservancy expressed support for the proposed project and its preservation plan consistent with our recommendations.

Historic Use

The Secretary of the Interior’s Standards for the Treatment of Historic Properties states that “A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.” The regulations (36 CFR Part 68) state that the “Standards will be applied taking into consideration the economic and technical feasibility of each project.” Much discussion at the October 1, 2020 meeting appeared to indicate that this property’s historic use persists in 2020 and that this use should be encouraged indefinitely.

However, it must be noted that the property was originally a family-owned and operated residential-agricultural property devoted to commercial cultivation of oranges. With the death of the previous owner, the property’s combined residential/agricultural function ceased. At present, oranges are no longer being commercially cultivated, so it is no longer a working agricultural property. As stated in the letter from the Redlands Conservancy, attempts to preserve the property’s original function in recent years have failed. Recent owners have found that orange cultivation on the site is not economically viable. If there is no commercial value in the grove and non-profit attempts to preserve it have failed, its preservation in entirety appears infeasible. The grove cannot be converted to a new use in the way a warehouse can be converted to residential. These facts must be acknowledged in order to fairly assess what restrictions should be placed on redevelopment of the property.

Grove Barn

The Commission expressed an interest the grove barn being recommended a contributor and requested a more “robust argument” regarding its lack of significance. As detailed in the Methodology and References, the CRA report was thoroughly researched. In addition to a record search at the South Central Coastal Information Center (SCCIC), more than eighty references were consulted in the preparation of this document. They included primary and secondary sources: historic photographs, maps, aerials, dozens of newspaper stories, contemporaneous tourism-related publications, and Redlands histories were among the sources consulted.

No specific references to this building were discovered except for a mention of a 1908 building permit for a garage of wood/stone and iron that matched the existing building in dimensions. We made an educated guess that this information refers to the grove barn but no positive proof was discovered. The building does not appear in any of the historic photos. It appears to be a replacement of an earlier shed or dwelling in the same general location that is visible in the background of the 1891 photograph of the England Estate under construction.

Our field visit revealed a simple, moderately dilapidated shed of a typology common throughout most of the twentieth century. Corrugated metal shed construction is cheap and utilitarian and remains extremely common; the building’s physical characteristics are therefore not those of an architecturally significant or rare type of farm building. Large doors indicate probable use as equipment storage. Plastic over some windows and wood boards over others are alterations performed at unknown dates. None of the many textual references to the property that our research uncovered refer to the barn, so we have no evidence that its use was important to the function of the grove. The presence of an older, architecturally significant agricultural building also suggests that this building had a minor, unimportant role in the property’s history. Our long experience with historic research indicates that buildings that are not historically significant rarely leave an imprint on the historical record, so we do not think additional research would be likely to result in a fuller understanding of its role. In summary, our research, professional experience, and observation of the building’s design and materials strongly suggest that the building is merely old and lacks any historical or architectural significance and therefore our recommendation is that it be considered a non-contributor.