

RESOLUTION NO. 2021-01

A RESOLUTION OF THE HISTORIC AND SCENIC PRESERVATION COMMISSION OF THE CITY OF REDLANDS DETERMINING THAT THE PROPOSED MITIGATED NEGATIVE DECLARATION AND CULTURAL RESOURCES ASSESSMENT PREPARED FOR TENTATIVE PARCEL MAP NO. 20185, TENTATIVE TRACT MAP NO. 20305, AND CONDITIONAL USE PERMIT NO. 1143, FOR THE SUBDIVISION OF AN APPROXIMATE 8.8-ACRE PARCEL OF PROPERTY LOCATED AT 301 W. PALM AVENUE, DO NOT ADEQUATELY ADDRESS POTENTIAL ADVERSE IMPACTS TO CULTURAL AND HISTORIC RESOURCES IN ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, Redlands Palm Investments, LLC (“Applicant”) has submitted applications to the city of Redlands for Tentative Parcel Map No. 20185, Tentative Tract Map No. 20305, and Conditional Use Permit No. 1143 for the subdivision and development of an 8.8-acre parcel located at 301 W. Palm Avenue (the “Project”); and

WHEREAS, the Secretary of the Interior’s “Standards for the Treatment of Historic Properties” provides guidelines for the preservation and rehabilitation of historic resources, adherence to these standards is accepted as a method of avoiding significant adverse effects under CEQA, and the Historic and Scenic Preservation Commission has reviewed the Project in accordance with the applicable CEQA thresholds and guidelines; and

WHEREAS, on October 1, 2020, the Historic and Scenic Preservation Commission held a duly noticed meeting to consider the verbal and written staff reports, the MND and related Cultural Resources Assessment and Historical Evaluation Report, and the testimony and the written evidence submitted by and on behalf of the Applicant and by members of the public; and

WHEREAS, on October 1, 2020, the Historic and Scenic Preservation Commission deliberated upon the Project, expressed concerns pertaining to potential impacts on historical and cultural resources, and continued the meeting to October 15, 2020, as requested by the Applicant, to allow the Applicant’s consultant additional time to prepare and submit further information pertaining to potentially significant impacts as discussed in the meeting; and

WHEREAS, on October 15, 2020, the Historic and Scenic Preservation Commission held a duly noticed special meeting to consider the additional information submitted by the Applicant and the Applicant’s historical resources consultant, deliberated upon the matter and reiterated its concerns pertaining to impacts on historical and cultural resources on, and adjacent to, the Project site, and continued the meeting to December 17, 2020, as requested by the Applicant, to allow the Applicant time to prepare further information and/or Project revisions; and

WHEREAS, on December 17, 2020, the Historic and Scenic Preservation Commission held a duly noticed special meeting to consider the additional information submitted by the Applicant and Project revisions, deliberated upon the matter and reiterated Commissioners’

concerns and determinations pertaining to potentially significant impacts on historical and cultural resources on, and adjacent to, the Project site; and

WHEREAS, a proposed Mitigated Negative Declaration (“MND”) has been prepared for the Project which concludes that implementation of the Project would result in no potentially significant impacts with the implementation of nine mitigation measures in the areas of Biological Resources, Cultural Resources, Geology and Soils, Noise, and Tribal Cultural Resources; and

WHEREAS, the Historic and Scenic Preservation Commission is composed of seven volunteer residents of the City with diverse backgrounds and expertise whose collective expertise meets the professional requirements in the area of historic preservation for Certified Local Governments, and five members’ individual expertise meets the professional qualification standards under the Secretary of the Interior’s Standards and Guidelines in the areas of archaeology, history, and architectural history; and

WHEREAS, the Historic and Scenic Preservation Commission has carefully reviewed the Cultural Resources Assessment and MND prepared for the Project and determines that removal of character-defining features, the addition of features incompatible with the Property’s period of significance, and the level of change to the Property’s historic setting are significant environmental impacts to this Property; and

WHEREAS, the Historic and Scenic Preservation Commission disagrees with the recommendation for a Less Than Significant Impact (after implementation of mitigation measures) for the topic of historical and cultural resources;

NOW, THEREFORE, BE IT RESOLVED by the Historic and Scenic Preservation Commission of the City of Redlands as follows:

Section 1. The Cultural Resources Assessment determines that the England/Attwood Estate is eligible for designation as an Historic District under both the California Register of Historic Resources (“CRHR”) and the City of Redlands’ Historic Register, and acknowledges the rareness of such estates and that “few extant comparable examples of citrus estates feature all the character-defining elements exhibited by the England Estate.” Following a detailed review and discussion of the Project, the MND and associated technical documents, and the Cultural Resources Assessment and Historic Resources Evaluation prepared for the Project, the Historic and Scenic Preservation Commission disagrees with the conclusion of the proposed MND that the Project “does not cause a substantial adverse change to a historical resource pursuant to CEQA (14 CCR § 15126.4(b) (1)),” and that impacts are “Less than Significant with Mitigation Incorporated,” for the following reasons and determinations:

A. The Project proposes to remove a majority of the orange grove, which the Cultural Resources Assessment acknowledges is an important character-defining element to citrus estates.

B. The Project proposes to remove irrigation and other features that the Cultural Resources Assessment argues are contributing elements to the Property, contributing to its completeness and CRHR eligibility.

C. Walls, gates and fences proposed as a perimeter to the housing development are not typical to the period or to this type of property in Redlands' history. Adding these elements to the estate would create substantial adverse visual impacts that would affect the historic setting of the CRHR eligible resource and its contributing elements.

D. The MND does not adequately identify or disclose the potentially significant impacts to the citrus estate's historical settings and surroundings, brought up by the HSPC and members of the public. The Applicant's proposal to designate the England/Attwood Estate house as a historical resource (subsequent to entitlement approval) does not fully mitigate the impacts to the entire estate's historical value and contribution to the City's agricultural history in terms of the property's existing condition.

E. The Project is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties in the following ways:

- (i) The removal of a majority of the citrus grove that is visible from the public right-of-way will cause significant damage to the historic character of the Property by removing distinctive features, spaces, and spatial relationships that constitute the visual historic setting of the citrus estate property type, as viewed from Palm Avenue and Alvarado Street.
- (ii) Additional clarification to mitigation measures for cultural resources, specifying the time and level of archaeological monitoring and treatment, should be identified and required to adequately protect and preserve archaeological resources on the Project site.
- (iii) The new additions to the property, specifically pertaining to the layout and design of the proposed residential tract and its supporting components, will destroy a significant portion of the visible portion of the citrus grove from the public right-of-way, essentially resulting in the destruction of historic features and their spatial relationship with the citrus estate that characterize the property.
- (iv) The alterations to the historic resource and its immediate surroundings would materially impair the significance of the historic resource constituting a substantial adverse change as defined under CEQA Guidelines Section 15064.5(b)(1), directly caused by the Project's inconsistency with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

F. The following are examples of the transcribed comments made by the members of the HSPC in support of the adoption of this resolution:

- (i) Chairperson Heidelberg: *"It's not typical of the period, or this type of property in Redlands' history. Adding these elements to the estate creates substantial visual*

*impacts that affect the historic setting of the proposed district and its contributing elements. The park in the western corner of the property, it doesn't appear to match anything that is particularly contemporaneous to the property's period, in Redlands' history nor is it typical for citrus estates. The removal of the citrus trees and addition of these park features takes away from the character of the property as a citrus estate. Now we move on to the proposed, I think it is 30 houses, the project is far more dense than any other housing in Redlands from the subject time period, particularly in the immediate vicinity. Even overlooking the removal of the citrus trees necessary to make way for this construction, the housing would even further diminish the historic setting of this proposed district. And then finally, the project would result in severe visual impacts with respect to the property's historic context and setting both from within the project itself and the surrounding streets, and adjacent historic period homes. Just to reiterate, this estate is a rare and extraordinarily representative example of a 19th century citrus estate with significance to the history of the city of Redlands and its general vicinity. The project, unfortunately would remove so much of the integrity that makes the property so meaningful resulting a housing development with remnant old buildings and some trees from an estate that once was. We are not going to have this estate, look and feel and setting anymore with the proposed development as I am seeing it in the presentations. So, much more work has to be done to the design of the project, before I can acknowledge a finding of no substantial adverse change."*

- (ii) Vice-Chairperson Keller: *"I just wanted to concur with what you said (to Heidelberg). This obviously would be a pretty significant impact to the district as it has been defined in the statement created for this project and I see no way around that. Certainly not as written. So yeah, more work needs to be done to assess the significance of this, where that significance lies, whether the significance would be so irreparably harmed by the removal of the grove and whether this particular thing this constellation of features is so significant to the history of Redlands that removal of that would really constitute a harm to the City and if we still wanted to do that as a City. Well, we need to do more than monitor it, we would have to do something much more than that and we would need to talk through that further so I agree with you [Heidelberg]"*
- (iii) Commissioner Holm: *"I have a couple of questions and I want to echo Vice Chair Keller that I agreed with everything she said but I have a couple specific questions that I was hoping you that guys get to the bottom of this. One, I'm curious to the choice of treating the estate as a district as opposed to an individual resource...The second question is regarding the grove barn, which you have listed as a non-contributor. The construction date falls within your designated period of significance but I didn't really see a discussion of why it's not a contributor. I was wondering if you guys can discuss why those choices were made."*
- (iv) Commissioner Bricker: *"The significance of this property really begins with the*

grove. The whole notion of the grove house is the relationship between the house and the grove. In fact, in this case, the grove is older than the main house because the main house was significantly altered in 1914. Yes, there is the cottage, and there is the carriage house, certainly those are very important features but the grove is really what defines this place, both historically and of course today, and groves are very, very limited and precious to what is Redlands. If there is one feature, one physical feature that identifies our city, it's the groves. And that is way I think we're expressing our concerns to such a great extent. So that's one thought. Another thought, is that, yes certainly this is zone residential, as Mr. Jordan pointed out, whether that means multifamily residential, I don't know but it is residential and if you look at the pattern of residential development in this area, typically the houses face towards the street in the majority of the cases, there's nothing obstructing the house from the street, unlike communities like Bel-Air, Beverley Hills where it is very hard to see the house. In this case, there is a very open relationship between the house and the street. It's part of the historic character of the area. The other thought I had about the houses, and how you sited them, is that certainly as it has be pointed out, the square footage of the houses is generous but the space around the houses is not. And that again, and I'm really thinking in historic terms, if you look at the pattern of development if you were to take an aerial view and turn it to a figure ground map or something like that, the relationship between the house and the surrounding sites is very different than what you are showing. It is much more generous outdoor space around the houses. So you know, my thinking increasingly, this is just my own opinion as a professor, and telling architecture students how to design is if it is essential, that new units be introduced to the site that they would be reserved the rear half of the site so that the frontage along West Palm can remain a grove and that the houses themselves are then set within the physical context of a grove that would be the middle ground in my mind, that would be more successful solution with access from Alvarado. That would be just a recommendation I would have. But once again, it's the grove that counts here in terms what makes it historically significant."

- (v) Vice-Chairperson Keller: "If the construction of this project, would impact the eligibility of the structures themselves, let alone the district as it's been identified, as having integrity and being eligible, at least locally and possibly to the state level. That is something that is not addressed in the document I have. It has not been fully evaluated and so I think that your suggestion which I have seconded that, this needs to go to another round like we need to have a lot more thought and information before the public can make a determination on whether or not they want this project to happen because right now it appears that the impacts are not being addressed and not being mitigated and that is my position that the impact that we can see been identified in the cultural report but not mitigated and so you do not have a mitigate negative declaration."
- (vi) Chairperson Heidelberg: "I think my position is pretty clear... I would like to move that the commission vote to make a recommendation to the planning

*commission to require an environmental impact report for this proposed project”*

- (vii) Vice-Chairperson Keller: *“I would like to see an amended ISMND. I think the cultural report is good but there aren’t appropriate mitigation provided at the moment. I seconded, recommending an EIR.”*

Section 3. This Resolution shall become effective upon adoption.

ADOPTED, SIGNED AND APPROVED this 4th day of March, 2021.

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Kurt Heidelberg, Historic and Scenic  
Preservation Commission Chair

ATTEST:

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Linda McCasland, Secretary

I, Linda McCasland, Historic and Scenic Preservation Commission Secretary of the City of Redlands, hereby certify that the foregoing resolution was duly adopted by the Historic and Scenic Preservation Commission at a regular meeting thereof held on the 4th day of March, 2021.

AYES:

NOES:

ABSENT:

ABSTAINED:

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Linda McCasland, Historic and  
Scenic Preservation Commission  
Secretary