

Attachment K



DIVERSIFIEDPACIFIC COMMUNITIES

November 5, 2020

The Historic and Scenic Preservation Commission
City of Redlands
35 Cajon Street, Suite 2
Redlands, California 92373

Subject: Cultural Resources Assessment/Historical Resource Evaluation (CRA)
TPM 20185, TTM 20305, and CUP 1143

Honorable Commissioners:

On behalf of Redlands Palm Investment, LLC, we respectfully ask for your consideration of the proposals (Project Enhancements) we are presenting in this letter and attachment. Thank you once again for your patience as we refine our applications.

After the special hearing of October 15th, we and our consulting team once again discussed your comments internally as well as with city planning staff and the city's consultant. In response to your suggestions, we also researched the HABS, HAER, and HALS programs and guidelines as administered by the National Park Service.

We were encouraged by your comments indicating support for our proposal to preserve additional citrus trees by removing the proposed park and blending the corner parcel with the Palm House parcel. This will create a three parcel TPM which will include an approx. 2.4-acre parcel for the Palm and Carriage Houses including the existing citrus trees up to the corner of Palm and Alvarado. Additional Project Enhancements are listed below.

After careful and respectful consideration of all the comments that have been presented by the commissioners, we must disagree that our professional research has been insufficient and that the removals proposed with our applications will result in the loss of the integrity of the site. We also believe that a HABS survey is not necessary since we are preserving the structures on the site. The HAER survey is not applicable to this site. Furthermore, there is no evidence to suggest that an archeological survey of the portion of the site to be disturbed will produce any findings.

Once again, we are preserving the Palm House, the Carriage House, and the Alvarado House in addition to the surrounding citrus trees on the expanded Palm parcel. We were disappointed that the Commissioners failed to attribute any value to or even acknowledge the letter of support submitted by the Redlands Conservancy.

We are, however, offering the following project enhancements in response to the Commissioners concerns:

- We will agree to a CoA on the TTM that requires us to complete a Level III HALS like report for the site. Level III is appropriate for sites that are less complex and of local and not national or state significance. This Level III survey must be completed before any grading or citrus tree removal can occur. Please see the attached memo from BCR for a further description of this report.
- We will agree to a CoA on the TTM to require us to apply for a “Historical Property” designation on the resulting Palm parcel (approx. 2.4 acres) as defined within the City of Redlands Municipal Code chapter 2.62.
- We will provide archaeological monitoring for all initial project-related ground disturbing activities. The monitor would work under the supervision of a Cultural Resource Professional that meets the U.S. Secretary of the Interior Professional Qualification Standards for Archaeology. In the event of an archaeological discovery, the monitor would have the authority to temporarily divert construction excavation in the vicinity of the find until it can be evaluated for significance. Please see the attached memo from BCR for a further description.
- We have modified our Landscape planting plan for lettered lots A-D of TTM 20305-PRD to include more mature citrus trees with a closer spacing. See the revised Landscape Plan.
- We will construct an interpretive kiosk in an appropriate location (within public view near the corner of Palm and Alvarado) which will document the entire site with archival photographs and messaging designed to inform the public of the history of the site. Please see the attached memo from BCR for a further description.

Consistent with our commitment to preserving the primary structures on the site, the restoration of the Alvarado house has begun. The work is being designed and constructed under the supervision of Brett Waterman. Brett’s reputation and body of work speak to his commitment to quality and his sensitivity in restoring properties in the Inland Empire, particularly in the City of Redlands.

We appreciate your careful consideration of the Project enhancements we have offered and the attached memo from BCR. Our team will be present for the continued hearing on a date to be determined to discuss our enhancements further and answer any other questions.

On behalf of Redlands Palm Investment, LLC, I thank you again for your dedication to the city, your kind consideration of our applications, and your willingness to consider the Project enhancements we have offered.

Best Regards,

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