



August 4, 2019

Lupita Garcia, Assistant Planner
City of Corona Community Development Department
400 South Vicentia Avenue
Corona, California 92882

RE: Application for Landmark status on Corona's Register of Historic Resources for the property located at 506 East Seventh Street APN 117-205-002

Dear Ms. Garcia:

Please withdraw any previous letters or drafts of letters on this subject and substitute this letter as our response.

Over the years CHPS has received much advice and direction from sitting City Councilpersons that those properties on our local Register should represent the "best of the best" historic properties to be found in our community. We are mindful that the intent of the establishment of Corona Register was to provide a local register comparable with the California Register and the National Register, with similar criteria, definitions, and considerations, (Corona Municipal Code {CMC} Chapter 17.63.040 (A)). We also have concluded that Landmark properties listed on our local register may lack many details and are not necessarily worthy of consideration for the state or national register.

Members of our Society and former members of the Planning Staff have attended meetings of the California Historic Resources Commission where discussion took place on various applications to determine whether the acceptance criteria were met or not. State Office of Historic Preservation staff and Commission Members went to remarkable detailed lengths in taking their responsibilities very seriously and from time to time determined that a particular submission just did not measure up or didn't measure up at that moment. We have had similar experiences here in Corona.

This property was listed with "high" potential for future landmark consideration in the survey accomplished in 1982, that became Corona's Historic Resources Inventory List, based on its physical condition, continued integrity and year of construction (1900). Typically, only properties rated as "high" or restored to "high" status are considered for landmark designation, but additional criteria must also be met.

We understand that CMC Section 17.63.050 establishes our local Landmark Listing Criteria. Paragraph A defines what a landmark is and defines its eligibility if the City Council finds that **all** of the accompanying 4 criteria are met.

The Board of Directors of the Corona Historic Preservation Society offers the following concerns and comments for your consideration:

- CMC section 17.63.050 (A)(1) Requires that the property in question be 50 years old. This property clearly meets this criteria.
- CMC section 17.63.050 (A)(2) Requires that the property in question has significant historic, cultural, or architectural value and that its designation as a landmark is reasonable, appropriate and necessary to promote, preserve and further the purposes and intent of the Chapter. Our conclusion is that this property lacks significant historic, cultural or architectural value but it is one of the last remnants of a depleted stock of historic homes in our community so it does retain historic value.
- CMC section 17.63.050 (A)(3) Requires that the property exhibit one or more of the following 9 characteristics:
 - (a) It is associated with events that have made a significant contribution to the history of Corona, the region, the state or the nation;
 - (b) It is associated with the lives of persons significant in Corona's past;
 - (c) It embodies distinctive characteristics of a style, type, period or method of construction or a valuable example of the use of materials or craftsmanship;
 - (d) It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural or natural history;
 - (e) It is representative of the work of a notable builder, designer or architect;
 - (f) It exemplifies one of the best remaining architectural styles or types in a neighborhood or contains outstanding elements of architectural design, detail, materials or craftsmanship of a particular historic period;
 - (g) It is in a unique location or contains physical characteristics representing an established and familiar visual feature of a neighborhood;
 - (h) It is a potential source of archeological or paleontological interest;
 - (i) It is or contains a natural setting or feature that strongly contributes to the well being of the people of the city;

After a review of a revised applicant's statement of architectural significance, for this submittal, the CHPS Board of Directors observed that there was not a clear current photograph of the front elevation of the house for us to evaluate. We were able to determine that the property located at 506 East Seventh Street met the minimum requirements of CMC Section 17.63.050(A)(3)(f) only. This property does exemplify a "... remaining architectural style or type in a neighborhood."

CMC section 17.63.050 (A)(4)(a) Requires that the property in question has integrity of location, design, setting, materials, workmanship, feeling and association;

- (a) Integrity is the authenticity of an historic resource's physical identity, as evidenced by the survival of characteristics that existed during the historic resource's period of significance, to be recognizable and to convey the reasons for its significance. No significant alterations appear to have been made.

CMC section 17.63.050 (A)(4)(b) Requires that the property in question has "integrity of location, design, setting, materials, workmanship, feeling and association." After a review of a revised statement of significance, for this submittal, the CHPS Board of Directors determined that the property located at 506 East Seventh Street met the minimum requirements of CMC Section 17.63.050(A)(4)(a) and (b). It has been in place for 119 years and does possess "... integrity of location, design, setting, materials,

workmanship, feeling and association.”

CMC Section 17.63.050(A)(4)(b) further states that “. . . A site, . . . that has diminished . . . appearance may still have sufficient integrity for the Corona Register if it retains the potential to yield significant scientific or historical information or specific data or retains sufficient character to convey the reasons for its significance. Thus, it is possible that a site, improvement or natural feature may not retain sufficient integrity to meet the criteria for listing on the California Register or National Register, but it may still be eligible for listing on the Corona Register; We seriously doubt whether significant scientific or historical information or specific data can be obtained from this site to add to the merits of this application.

We have concluded that this property, in its current condition, forces the viewer, when traveling eastward on Seventh Street, to imagine what the face of the house looks like from curbside. It is simply not visible from that angle, nor is a clear full frontal view possible when traveling westbound. In earlier correspondence we commented that this property was not sufficiently “polished up” for presentation as Landmark property and action on this application should be postponed until a later date.

While we understand that Corona’s preservation agreements permit work plans to include street facing structural renovation and preservation as well as street facing front yard “greenscape” improvements. The decision on whether a property should be granted landmark status should not be based on promises by an owner to use any future Mills Act tax savings to bring the property landscaping up to community landmark expectations. To our knowledge, all of Corona’s Landmark properties were “camera ready” when the City Council took final action on them. This property is not “camera ready” now. It our feeling that granting landmark status when “landmark worthy” street facing aesthetic landscaping is absent sets a bad precedent, and breaks faith with all other Landmark property owners who were required to complete such improvements prior to appearing on Planning Commission/ City Council agendas.

CMC Section 17.63.050(A)(4)(c) does not appear to require a response from CHPS.

The owners deserve much credit for their compliance with the Secretary of the Interior’s Standards for Rehabilitation in all the restoration work accomplished on the home prior to the submission of the application. After careful evaluation we can only conclude that the structure meets minimum landmark criteria. However, this property’s curbside appearance is not up to the standards met by all previous Landmark applicants.

This house has been here for 119 years. There is no compelling reason to declare this property a landmark at a time when qualifying work is incomplete. The structure will still be here next year. It is our recommendation that the owner make the landscaping improvements this year and resubmit the Landmark application next year.

Your careful review of our concerns, comments and conclusions is appreciated.

Sincerely,

FOR THE BOARD OF DIRECTORS

Richard Winn

Richard Winn, Acting Secretary