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# LETTER REPORT
# PROPOSED DELETION OF A EUCALYPTUS TREE AS A CONTRIBUTOR TO THE HAWTHORNE RESIDENCE LANDMARK DESIGNATION

**April 25, 2025**

## 1. Background

At the request of California Baptist University (CBU), Wilkman Historical Services (WHS) has prepared a letter report addressing the degree to which a eucalyptus tree qualifies as a contributor to the Hawthorne Residence Landmark designation. The Hawthorne Residence is located at 3747 Monroe Street, on the east side of Monroe Street, south of Magnolia Avenue. Figures 1 and 2 show the location of the residence in relation to the eucalyptus tree.

Recently, a large tree fell on a student housing building elsewhere on the campus, causing significant damage to the residential building (Figure 3). Fortunately, there were no students in the damaged units. If there had been students present, significant injury could have occurred. After this incident, the University's insurance broker, National Risk Control – GGB, recommended that CBU assess all of the trees on campus to determine if other hazards might exist. Page 3 of the broker's letter addressing their recommendations is included as Attachment A. In following up on the broker's recommendations, CBU became concerned about the potential hazard associated with the eucalyptus tree mentioned above.

The eucalyptus tree in questions is massive in size and is located in an area of significant student and visitor activity, including pedestrian traffic, student housing, and athletic facilities. Figure 4 is a current photo of the tree and its associated plaque. To its north is the Colony student housing complex and to its south is an athletic field with grandstands and a restroom/utility building. Flanking the tree is a walkway/driveway serving the student housing complex (Figure 2). The detachment of a limb could cause significant damage and/or injury to students and/or visitors to the campus.

An arborist from Monarch Environmental has examined the tree (Attachment B) to evaluate its health and likelihood of failure. The Following excerpt from the arborist's report summarizes her findings:

"…we consider it possible – not necessarily probable – that the tree could fail within a one-year timeframe, which renders it a Moderate risk. If we were to extend the assessment timeframe out to three- to five years, the tree would potentially be bumped up into the probable failure likelihood level, which is highly concerning and puts the tree in the High-Risk category."

2. **History and Existing Conditions**

**a. Property History: T**he Hawthorne Residence was built for English Born New York stockbroker Archibald C.E. Hawthorne. Mr. Hawthorne left New York for Riverside in 1886, seeking the health benefits of Riverside's mild climate. Settling into the Riverside community, Hawthorne purchased Lots 4 and 5 of Block 23 (Figure 5) of the Riverside Land and Irrigating Company's 1875 subdivision. Here he built his home, the Hawthorne Residence, and planted the balance of the property with citrus trees and vines (Hall, 2005: 73-74). Figure 6 is a period photograph of the residence taken in c. 1895. Figure 7 is a 1948 aerial photo of the property, showing the location of the Hawthorne residence and the approximate location of the eucalyptus tree at that time. This aerial photo has current streets superimposed on it to give better context for the property in relation to the overall area as it exists today.

The residence was designed by noted local architect A.C. Willard in the Victorian tradition that was popular in the late 1800s. Standing two stories tall, the gabled residence has a Swiss Chalet theme and a cross-axial plan. Giving the home a sense of depth, the roof eaves are extra wide and are supported by curved braces that sweep downward in a sunray-like design. A variety of textures is expressed in the siding of the residence, which includes flush tongue and groove boards, plain shingles, and scalloped shingles. Tall, wood framed windows enhance the home's sense of height; while a wrap-around covered porch gives the residence a sense of being anchored to the ground. The porch includes turned posts and a fanciful balustrade composed of boards arranged in seemingly random geometric shapes. Upper floor decks feature the same balustrade treatment. Projecting bays provide added variety to the residence (Ibid). Figure 8 is a current photo of the residence.

**b. Existing Conditions:** The Hawthorne Residence is currently located within a surface parking lot that serves students enrolled at CBU (Figure 2). In conjunction with the approval of the 2012 CBU Specific Plan, the Hawthorne Residence was retained in its historic location. This was in accordance with a cultural resources component of the CBU Specific Plan prepared by cultural resources consultant Jennifer Mermilliod Researching and Consulting (JMRC). To give the residence a sense of connection to Monroe Street, no parking was placed between the residence and the Monroe Street right-of-way. Instead, this area was landscaped, primarily with citrus trees and a corridor of mature palm trees. The only interruption to this landscaping is a drive that connects two halves of the adjacent parking lot. The parking lot design and landscaping were approved by the Planning Commission under case Planning Case P11-0192. The landscape and site design for the Hawthorne House were approved by the Cultural Heritage Board under case P11-0196.

As noted above, a feature once associated with the residence is a mature eucalyptus tree situated approximately 870 feet south of the residence. It is believed it survives from c. 1890. This tree was one of many eucalyptus trees that once formed a windrow along the south property line, serving as a windbreak to the adjacent citrus grove. This massive tree is now located in a raised planter in the middle of an asphalt walkway/driveway that currently serves a contemporary student housing complex (The Colony at CBU).

Windrows, also known as windbreaks and shelterbelts date as far back as the 1400s when the Scottish Parliament encouraged local farmers to plant rows of trees to protect crops from wind damage. As settlement in the United States shifted westward, homesteaders planted trees to protect crops, homes, and livestock from wind related damage. In the 1930s the U.S. Congress adopted the Prairie States Forestry Project which facilitated the planting of windrows to lessen the effects of Dust Bowl conditions (Brandle, Hodges and Zhou, 2004: 65).

When the residence was designated a Landmark, the eucalyptus tree was determined to be a contributing feature of the residence. JMRC Mitigation measures called for the evaluation of the eucalyptus tree by a qualified arborist and the protection of the tree as recommended by the arborist (JMRC, 2012: 62). The tree is situated in a raised planter held in place by a low concrete block retaining wall. Some distance away, adjacent to Monroe Street, is a bronze plaque (Figure 4) that explains its association with the Hawthorne Residence.

**c. Landmark Designation:**

1. **CRM-Tech Cultural Resources Report:** In 2011, CRM-Tech prepared a report that analyzed the impacts to historic resources of the construction of a 317 space parking lot flanking two sides of the Hawthorne Residence (Tang and Hogan, 2011). The report also analyzed needed repairs and alterations associated with the adaptive reuse of the residence for administrative offices. The report determined that the residence appeared to be eligible for designation as a City of Riverside Landmark; however, the scope of work did not include the actual designation of the residence. The project addressed in the CRM-Tech report was approved subject to several mitigation measures (Planning Case P11-0196). No mention was made of the eucalyptus tree in the CRM-Tech report.

2. **JMRC Cultural Resources Report:** In 2012, JMRC prepared a cultural resources survey and evaluation of the CBU property in relation to a specific plan then underway for the CBU campus. Among the resources addressed in the JMRC report was the Hawthorne Residence (JMRC, 2012: 37, 38, and 62). The JMRC report found the residence to be eligible for designation as a City of Riverside Landmark, with the tree qualifying as a contributor to the historic residence.

3. **The Question as to whether the Eucalyptus Tree Qualifies as a Contributor to the Landmark Designation**

In WHS's analysis of the residence and tree, it was found that the tree fails three tests of a resource's qualification to be designated a contributor to a historic resource. First, it does not meet the qualifying criteria for designation as a local Landmark; second, it does not qualify as a contributor to a historic resource; and third it does not retain sufficient integrity to be designated a historic resource. Below is an analysis of these three factors.

**a. Criteria for Designation**: Based on the evaluation by JMRC, the Hawthorne Residence and eucalyptus tree were found to be eligible for local listing as contributor to a City Landmark under Title 20 of the Riverside Municipal Code (Planning Case P11-0663). Applicable criteria supporting its status as a contributor consisted of the following:

Criterion A: **"**Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history" (RMC 20.50.010).

Criterion I: "Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes, or distinctive examples of park or community planning" (Ibid).

Under Criterion A, the analysis asserts that the residence and tree are vestiges of early residential development along the Magnolia Avenue corridor; and that the tree is likely the last extant specimen associated with the earliest development of the subject property (Planning Case P11-0663).

WHS notes that, while the tree may be the last extant specimen associated with the earliest development of the property, significant urban development has occurred in the 870 feet between it and the residence and, thus, it is no longer significantly associated with the Hawthorne Residence.

Under Criterion I, the analysis notes that urban development has largely replaced the agricultural development once associated with the Magnolia Avenue corridor. In this regard the analysis asserts that the Hawthorne Residence and related eucalyptus tree represent a relatively intact example of a grove house and is one of the few remaining grove houses that once lined Magnolia Avenue at the turn of the century (Ibid).

WHS believes the residence and tree are not "a relatively intact example of a grove house" intactness involves the elements that combine to represent a coordinated entity. The remoteness of the tree in relation to the residence precludes it from being considered an intact element of the Landmark residence.

**b. Contributor/Noncontributor:** The eucalyptus tree is listed as a contributor to the Hawthorne Residence Landmark designation. Title 20 of the Riverside Municipal Code defines both "contributor" and "noncontributor." These definitions are as follows:

"Contributing feature means a site, improvement, or natural feature that within a Historic District, Neighborhood Conservation Area, or an individually significant property that provides appropriate historic context, historic architecture, historic association, or historic value, or is capable of yielding important information about the period including, but not limited to: streets, curbs, sidewalks, streetlights, street furniture, signs, landscaping, monuments, and works of art, gutters, setbacks, signage, parkway, alleys, walls, fencing, and gates (RMC 20.50.020).

"Non-contributing feature of a Historic District, Neighborhood Conservation Area, or individually significant property means a site, improvement, or natural feature within a

Historic District or Neighborhood Conservation Area that does not provide appropriate historic context, historic architecture, historic association or historic value, or is not capable of yielding important information about the period, because that element:

A. Was not present during the district's or area's period of historic significance; or

B. No longer possesses integrity due to alterations, disturbances, additions, or other changes; and

C. Does not independently meet the designation criteria as defined in this title" (Ibid).

WHS looked at the degree to which the tree is a contributor or noncontributor, focusing on the criteria that make a resource a noncontributor. In terms of item A above, the tree was in fact present during the district's period of significance. So this criterion does not apply. However, criteria B and C do apply. In terms of criterion B, there are significant changes to the vicinity of the tree that render it unqualified as a contributor. Specifically, it is important to note that the tree is no longer visible from the residence, due to its distance (870 feet) from the residence and the presence of significant landscaping and related buildings between the residence and the tree. This isolates the tree from the residence and compromises its historic setting. The average person looking at the tree would not likely associate it with the Hawthorne Residence. In terms of item C, as discussed above, the tree does not independently meet the designation criteria of Chapter 20.50.020.

**c. Integrity:** For a resource to qualify for designation as a Landmark, it must retain integrity. Title 20 of the Riverside Municipal code defines integrity as follows: "Integrity means the ability of a cultural resource to convey its significance. To retain integrity a cultural resource must retain most of the aspects that closely relate to the resource's significance including location, design, setting, materials, workmanship, feeling, and association" (RMC, 20.50.010).

WHS believes the eucalyptus tree does not retain sufficient integrity to qualify as a contributor to the Hawthorne Residence. Integrity of design, materials, and workmanship apply to buildings and structures and, thus, do not apply to a natural feature such as the tree in question. Location, setting, feeling and association do apply. While the Riverside Municipal code does not define the aspects of integrity, the National Register of Historic Places provides guidance in regard to the application of these aspects of integrity. These criteria are universally accepted as appropriate for judging the integrity of a potential resource. Here are excerpts from Bulletin 15 which details how to determine if a resource qualifies for designation in regard to integrity (National Register Bulletin 15, 1997:45).

**Location:** "Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons" (Ibid).

WHS believes that, while the location of the tree is unchanged, its relationship to its setting has changed significantly. As noted above the "…actual location of a historic property, *complemented by its setting*, is particularly important in recapturing the sense of historic events and persons" (Ibid). Because its setting has been significantly altered, the Hawthorne Residence eucalyptus tree does not meet this criterion.

**Setting:** "Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space" (Ibid).

As noted above, the setting of the tree has changed significantly. It is no longer in a rural environment, but rather it is in a very urban setting. The presence of campus buildings, parking, and landscaping in the 870 feet between it and the Hawthorne Residence are major detractors to the qualification of the tree as a contributor to the Hawthorne Residence Landmark designation. In this regard, it is noted that the tree cannot even be seen from the residence.

**Feeling:** "Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character" (Ibid).

WHS believes that the urbanization of the area around the tree detracts from its integrity of feeling. Its remoteness from the Hawthorne Residence is also a negative factor in relation to integrity of feeing.

**Association:** "Association is the direct link between an important historic event or person and a historic property" (Ibid).

Given the tree's 870 foot distance from the Hawthorne Residence and the presence of landscaping and buildings that obscure the view of the tree from the residence, the tree can no longer seen as an entity that is associated with the residence.

4. **Conclusion**

In essence, then, although the tree is no doubt historically related to the Hawthorne Residence, the distance it is from the residence and the urban development and landscaping between the tree and the residence render its relationship to the residence very weak. The following factors come into play here:

1. It does not meet the criteria for designation as a City Landmark.

2. It does not meet the four integrity criteria (location, setting, feeling, and association) that apply to a natural feature.

3. It meets items B and C of the definition of a noncontributor.

5. **Recommendation:** For the reasons noted above, WHS recommends the eucalyptus tree be deleted as a contributor to the Hawthorne Residence Landmark designation. WHS recommends the plaque be returned to the City of Riverside.

6. **Revised DPR Form**

   A revised DPR form (Attachment C) has been prepared to accommodate the above recommendation.

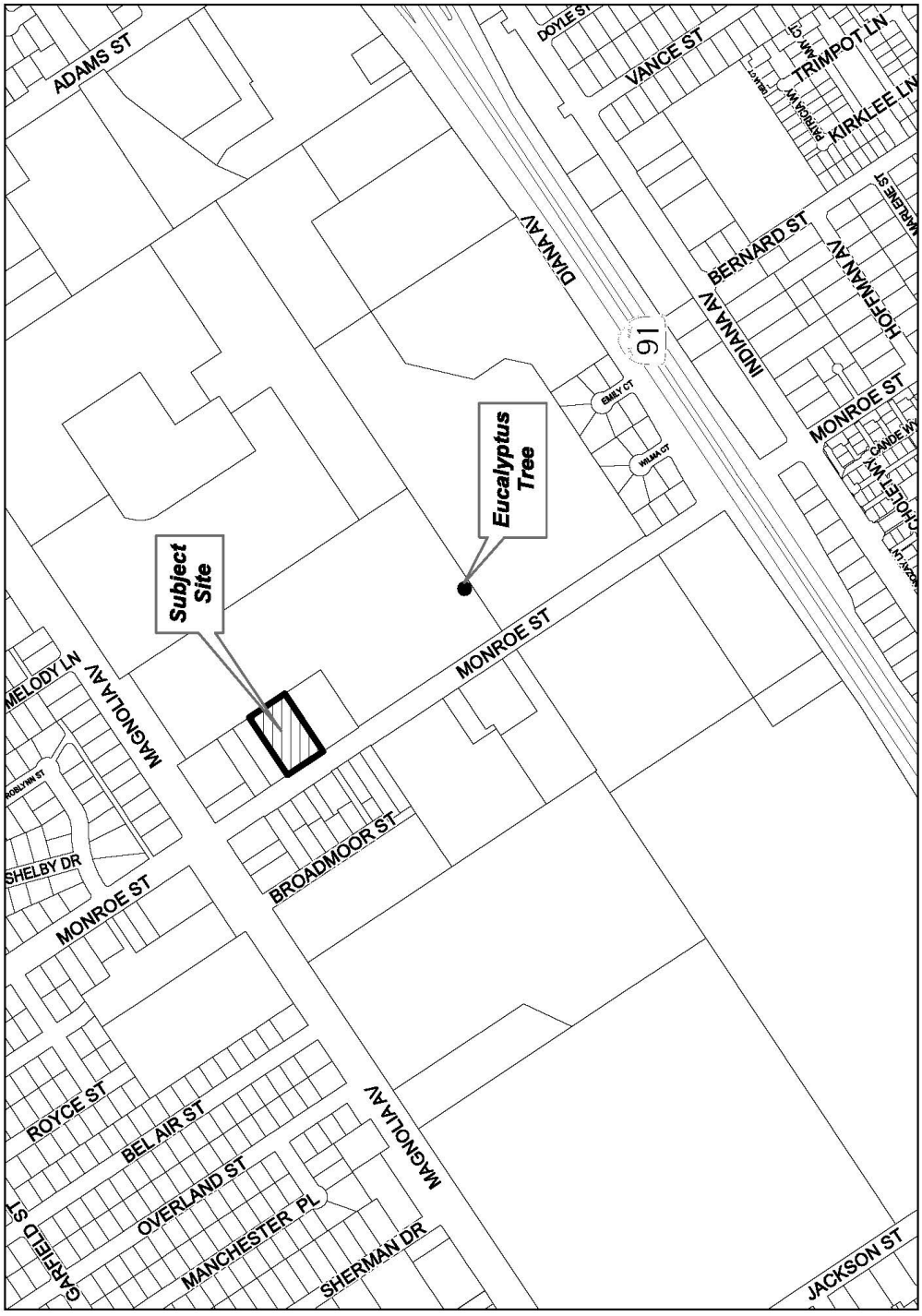


**Figure 1: Map Showing the Residence in Relation to the Eucalyptus Tree**

**Figure 2: Contemporary Aerial Photo Showing the Relationship between the Residence and Eucalyptus Tree**

**Figure 3: The tree that Fell on Student Housing in 2024**

**Figure 4: Eucalyptus Tree and Plaque**

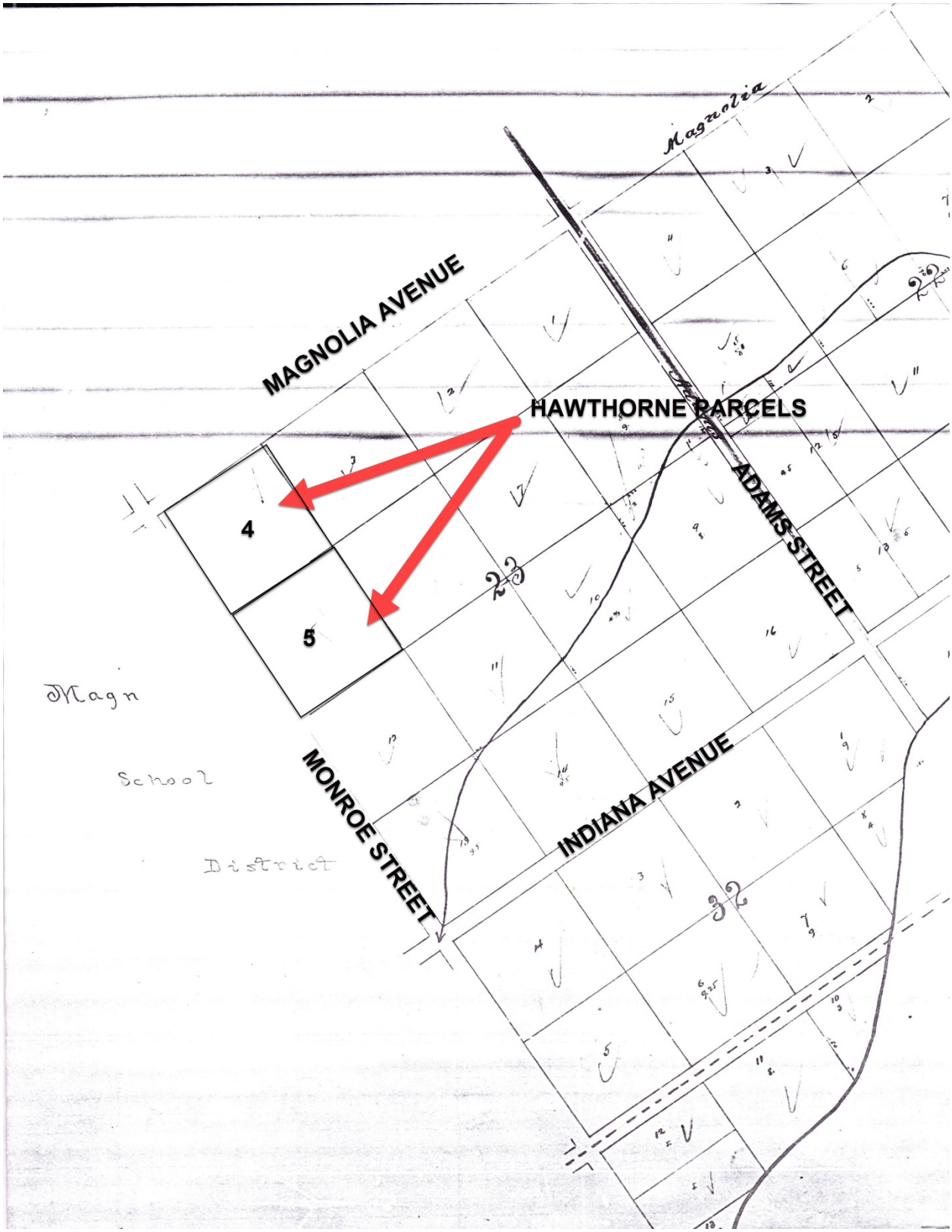


**Figure 5: Hawthorne Parcels c. 1889**

**Figure 6: Hawthorne Residence c. 1895**

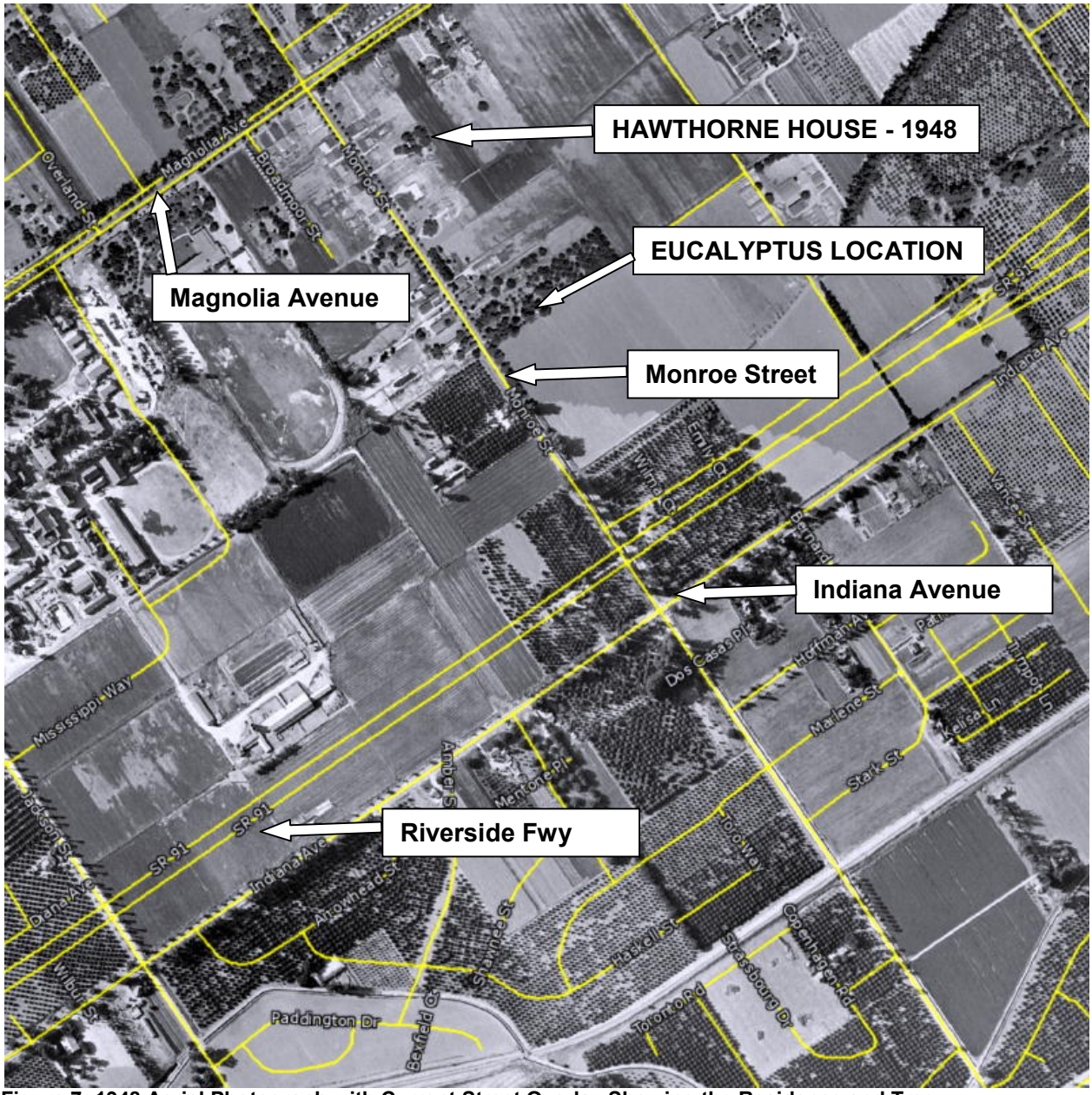


**Figure 7: 1948 Aerial Photograph with Current Street Overlay Showing the Residence and Tree**

**Figure 8: Contemporary Photo of the Hawthorne Residence**

**ATTACHMENT A: INSURANCE BROKER'S RECOMMENDATIONS**

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# Recommendations

The following recommendations are meant to help you in your efforts to improve your safety and risk management programs as well as aid in the reduction of your potential losses. These recommendations are based on our discussions and my observations. For you convince, I went ahead broke down each recommendation by area, type, and priority. Pictures, comments, and recommendations from the walkthrough are provided below.

| California Baptist University | |
|---|---|
| **24-01** | |
| **Priority: Needs Attention** | **Type: Life Safety** |
| | **Observation:**<br><br>Large trees are continuing to grow in and around the campus of California Baptist University including student housing.<br><br>**Concern:**<br><br>Trees have become property and life safety hazards to the campus and students. When large tree branches or entire trees fall after storms or other weather events, they pose risk to the structures, students, and students' personal property.<br><br>**Recommendation:**<br><br>While complying with local codes and regulations. Gallagher National Risk Control recommends the removal of trees as needed when they pose threat to property or life safety. |



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**ATTACHMENT B: ARBORIST'S REPORT**

# CALIFORNIA BAPTIST UNIVERSITY

## EUCALYPTUS TREE RISK ASSESSMENT

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**PREPARED FOR:**

## CALIFORNIA BAPTIST UNIVERSITY

**FACILITIES AND PLANNING SERVICES DEPARTMENT**

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**FEBRUARY 26, 2025**

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## INTRODUCTION & ASSIGNMENT

Monarch Environmental was recently asked to conduct a level three risk assessment of one Eucalyptus tree located on the California Baptist University campus in Riverside. We were asked to evaluate the tree's structural integrity, so we recommended utilizing resistance drilling and sonic tomography to evaluate the lower trunk for decay. The only limitations of note were that we conducted our assessment from the ground and did not inspect the canopy up close, nor did we excavate or otherwise inspect the tree's root system.

We performed the Resistograph and Tomograph testing on November 19th of this year, and in the following pages you will find our observations and recommendations, with readings and photos in the attached appendices.

## OBSERVATIONS

This tree is over 100 feet tall, and it has a trunk diameter of ninety-six (96) inches when measured at 4.5 feet above grade. It is in a raised planter, which appears to have been installed long after the tree was planted. There was a fungal conk present at the root collar, most likely of the *Laetiporus* genus, which is a wood decay organism. The tree's canopy was found to be in good health, and appears to be a heritage "wind row" Blue Gum Eucalyptus which were widely planted during the early- to mid-twentieth century along the edges of citrus and avocado groves in southern California. This tree is now surrounded by apartment homes and hardscapes, and it is almost certain that many of its roots have been pruned, or in some cases, removed, to facilitate the installation and / or repair of surrounding homes, parking lots, and sidewalks. Without excavating near the tree's trunk, we cannot be certain how many roots have been removed, but the likelihood of this having happened must be noted due to the presence of the retaining wall and the proximity of the tree to paved surfaces.

## TESTING & ANALYSIS

We began our advanced assessment by testing the wood density of the lower trunk with an IML PD 400 Resistograph, with drilling points located at various points around the trunk's circumference. The Resistograph is an important tool when it is necessary to get readings of wood density *below* natural grade as the drill can be angled downward to extend into the base of the trunk, and the drill bit extends a total of sixteen inches into the tree. When viewing the attached Resistograph readings, any section with a rapid drop or a flat line indicates a lack of resistance to the drill bit, which is indicative of a pocket of decay, a crack, and/or a cavity. The bark and cambium layers of trees do not provide the same resistance as heartwood, therefore the readings on the first couple of inches (read right to left) on each graph should not be considered too problematic. What we are looking for are signs of significant structural defects which may be symptomatic of diminished wood strength.

We followed up on the Resistograph testing by using a PiCus 3 Sonic Tomograph, using measuring points

arranged uniformly between six to twelve inches above grade. When viewing the Tomograph reading, dark brown wood is considered sound, whereas blues and purples indicate decay and / or cavities, and greens are considered to be somewhat of a transition area.

In the photos of the tree that can be found in the following pages, you'll note that both the Resistograph drilling points and Tomograph measurement points are indicated with numbered orange tags.

## DISCUSSION

When assessing the risk level of a given tree, there are many factors that come into play, primarily, the likelihood of the tree or tree part failing, likelihood of the tree or tree part hitting a given target (such as a person walking below, or an adjacent home), and the consequences of such a failure (injury, property damage, or loss of use of the area). Site factors such as a history of failures, root pruning for hardscape installation or repair, shallow and compacted soils, and generally limited rooting space all must be considered as well, in addition to species failure profiles. In this case, the branches, root systems, and root collars of certain Eucalyptus species are frequently more prone to failure than some other trees found in California.

While there are many instances where removing a potentially hazardous limb can decrease the risk of failure, in this tree's case, pruning out large lateral branches and creating sizeable wounds is not advised. The laterals growing over the adjacent student housing, walkways, and sports facility are so large that removing them would leave wounds over twenty-four inches in diameter, which are unlikely to fully close and compartmentalize. The likelihood of decay development in the canopy would be significant and highly concerning for a tree of this size.

After conducting the decay assessment, the tree was found to already have advanced decay at, below, and just above natural grade. This does not mean that the tree is likely to fail in the *immediate* future, but it should be noted that such decay will only worsen over time. The presence of trunk decay is not necessarily indicated by canopy health, which is why the tree currently has a full crown. Essentially, the appearance of good canopy health cannot be considered an indicator of whole-tree health. As we just mentioned, the existing decay will only worsen, which will undoubtedly lead to declining health and a significantly increased risk of trunk or root failure.

When taking all the aforementioned factors into account, we consider it *possible* – not necessarily probable – that the tree could fail within a one-year timeframe, which renders it a Moderate risk. If we were to extend the assessment timeframe out to three- to five years, the tree would potentially be bumped up into the *probable* failure likelihood level, which is highly concerning and puts the tree in the High-Risk category.

## RISK MATRICES

**Likelihood Matrix**

| Likelihood of Failure | Likelihood of Impacting Target | | | |
|---|---|---|---|---|
| | Very Low | Low | Medium | High |
| Imminent | Unlikely | Somewhat Likely | Likely | Very Likely |
| Probable | Unlikely | Unlikely | Somewhat Likely | Likely |
| Possible | Unlikely | Unlikely | Unlikely | Somewhat Likely |
| Improbable | Unlikely | Unlikely | Unlikely | Unlikely |

**Risk Rating Matrix**

| Likelihood of Failure & Impact | Consequences of Failure | | | |
|---|---|---|---|---|
| | Negligible | Minor | Significant | Severe |
| Very Likely | Low | Moderate | High | Extreme |
| Likely | Low | Moderate | High | High |
| Somewhat Likely | Low | Low | Moderate | Moderate |
| Unlikely | Low | Low | Low | Low |

## RECOMMENDATIONS & SUMMARY

Due to the risk factors discussed in this report, we recommend that the University consider removing this tree within the next year.

Please do not hesitate to contact us with any questions or concerns you may have. Thank you!

# SUPPORTING INFORMATION

# APPENDIX A

Figure 1: Map of the subject tree.

# APPENDIX B: TREE PHOTOS

Figure 2: The tree, as seen on November 19th.

Figure 3: Drilling points 1 - 4.

Figure 4: Drilling points 1 – 8.

Figure 5: Drilling points 5 – 13.

Figure 6: Drilling points 11 – 17.

Figure 7: Drilling points 17 - 21 and a fungal conk.

Figure 8: Drilling points 19 - 24 and a fungal conk.

Figure 9: Drilling points 23 - 29.

Figure 10: Drilling points 23 - 30 and the PiCus 3.

# APPENDIX B:

# RESISTOGRAPH & TOMOGRAPH READINGS

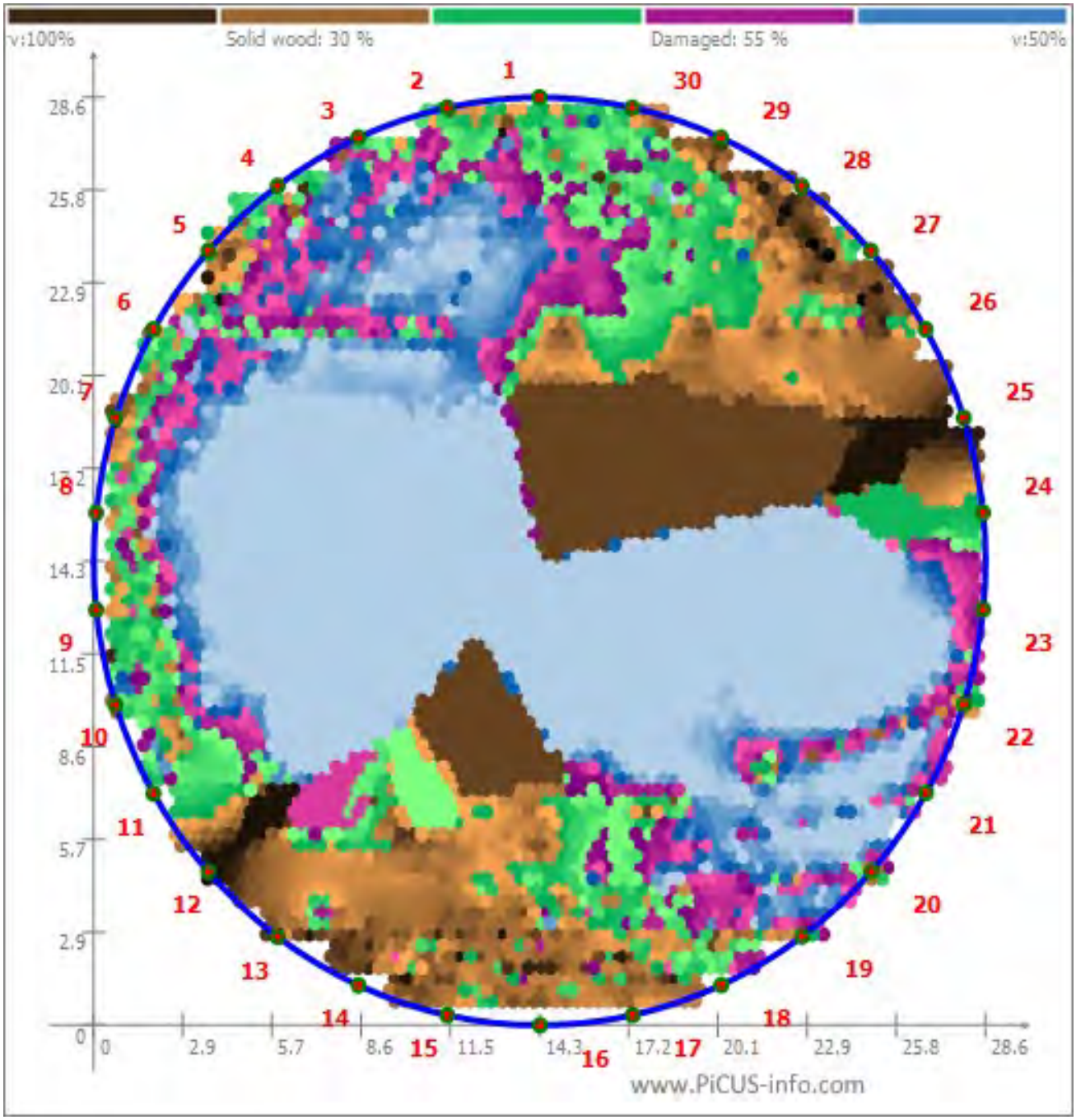


Figure 11: Tomograph reading. Note the measured solid wood at 31% and damaged wood at 55%.

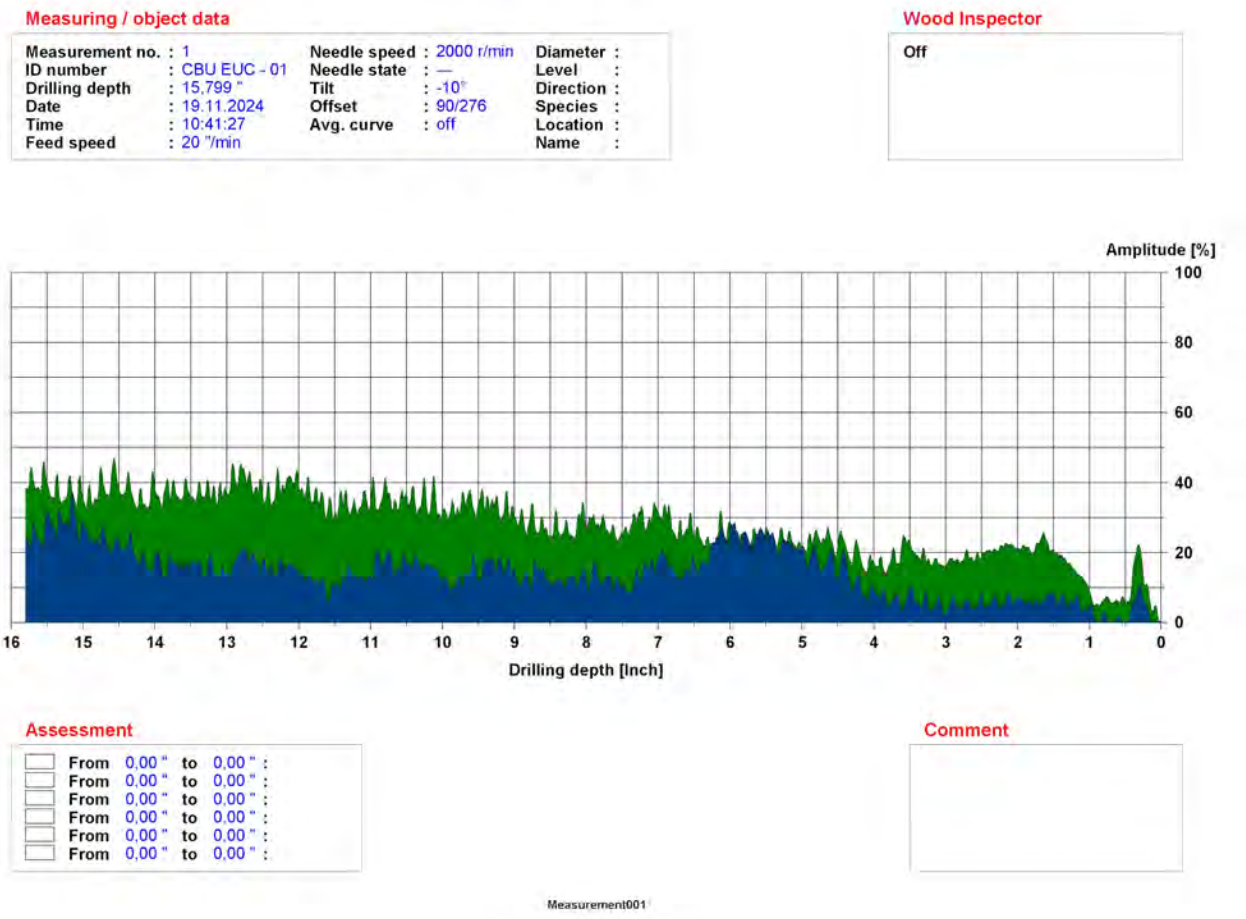


Figure 12: Resistograph reading for drilling point 1.

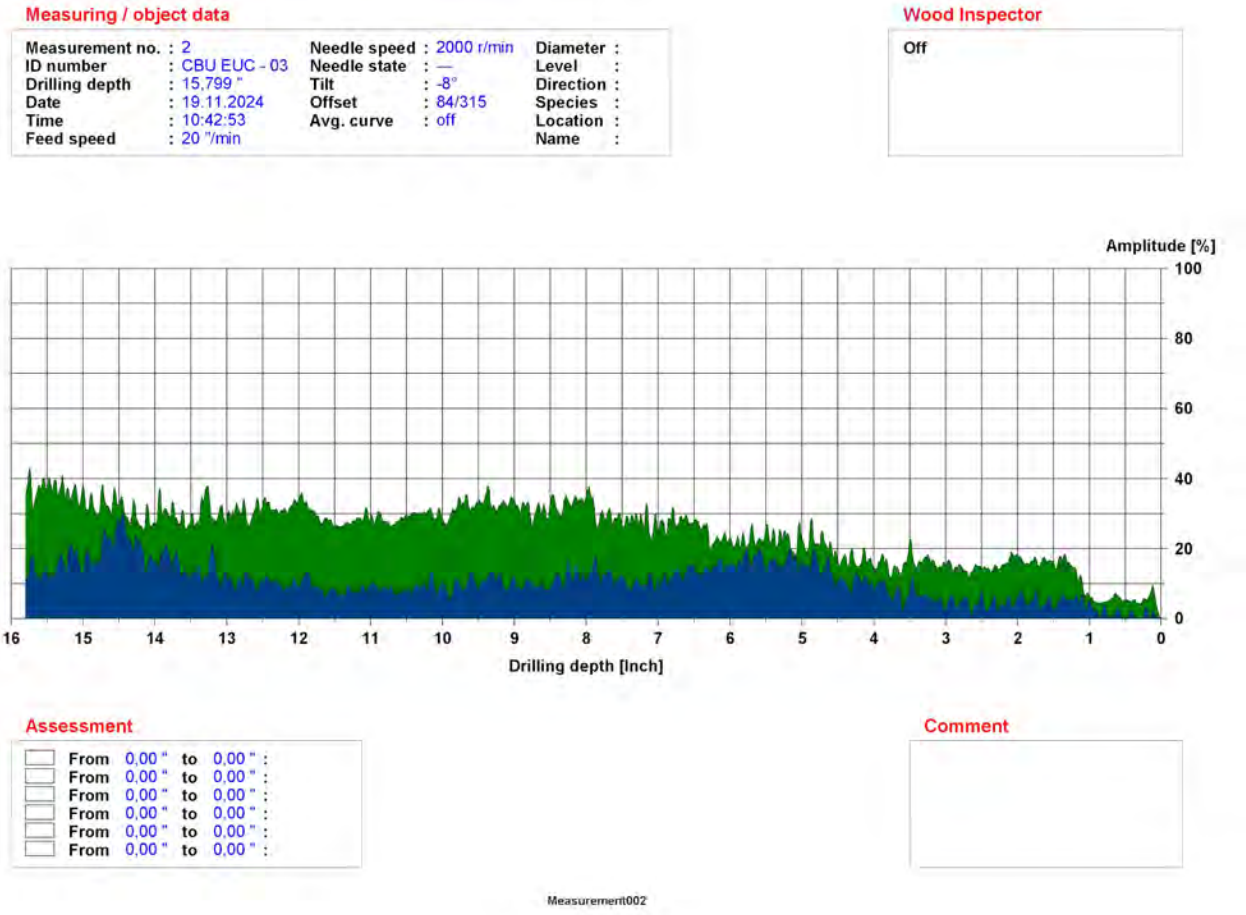


Figure 13: Resistograph reading for drilling point 3.

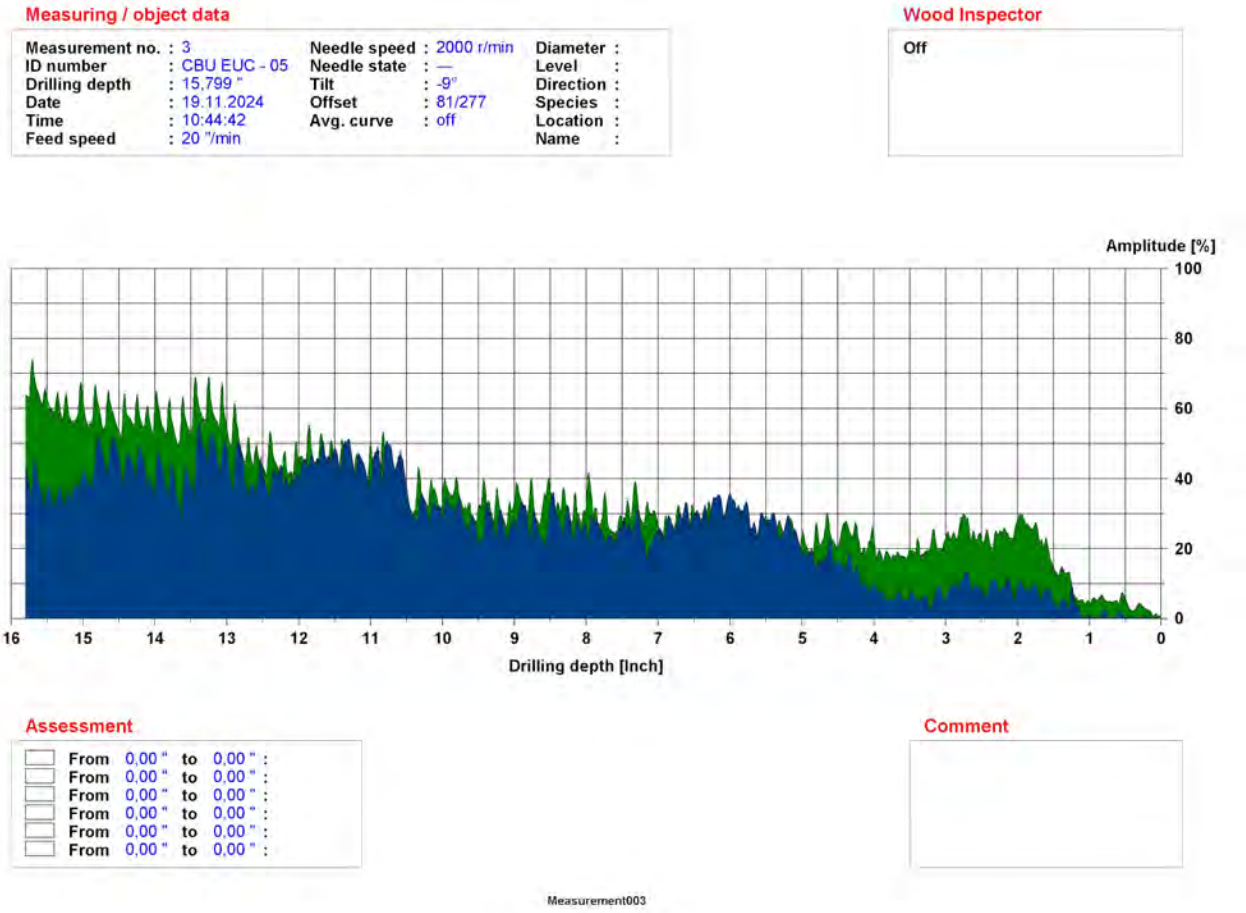


Figure 14: Resistograph reading for drilling point 5.

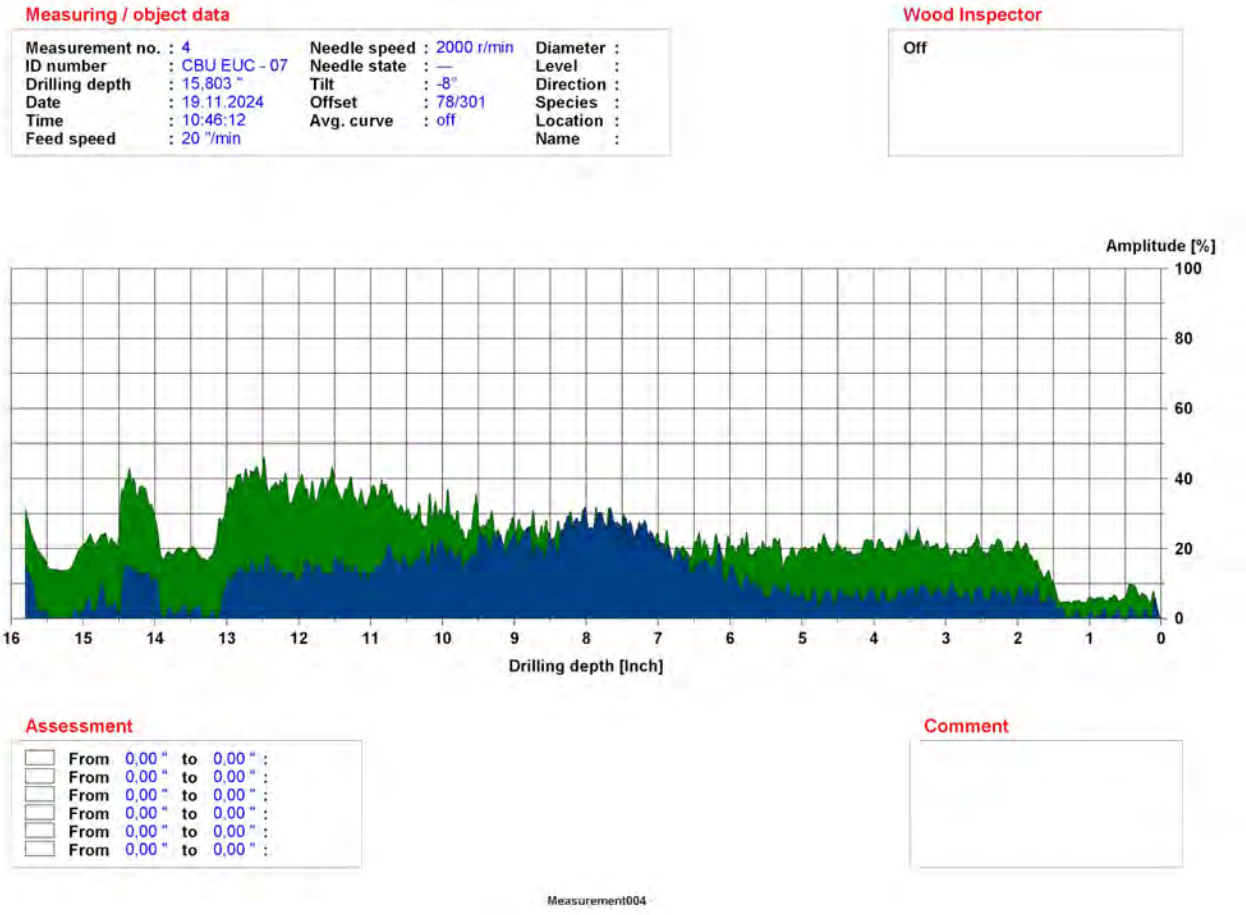


Figure 15: Resistograph reading for drilling point 7.

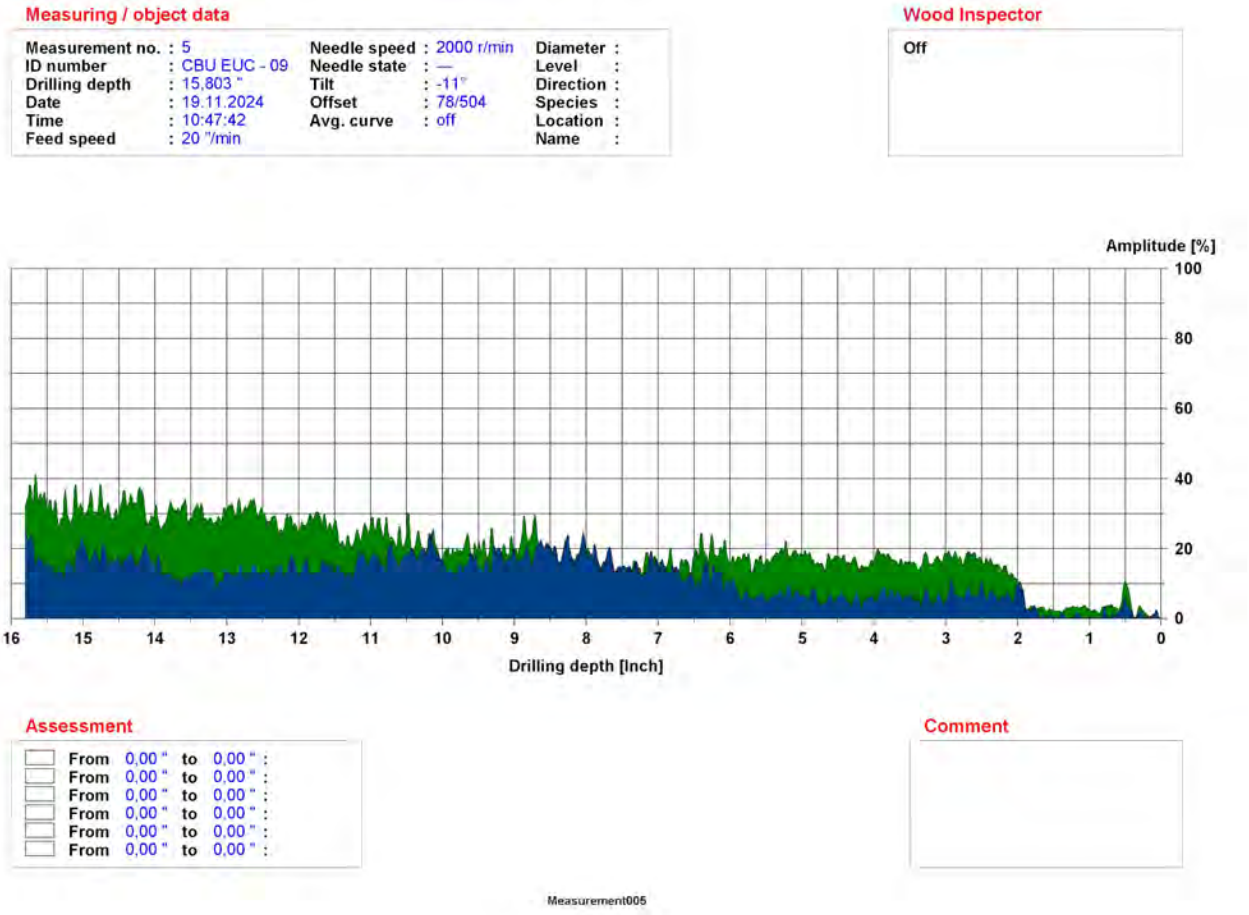


Figure 16: Resistograph reading for drilling point 9.

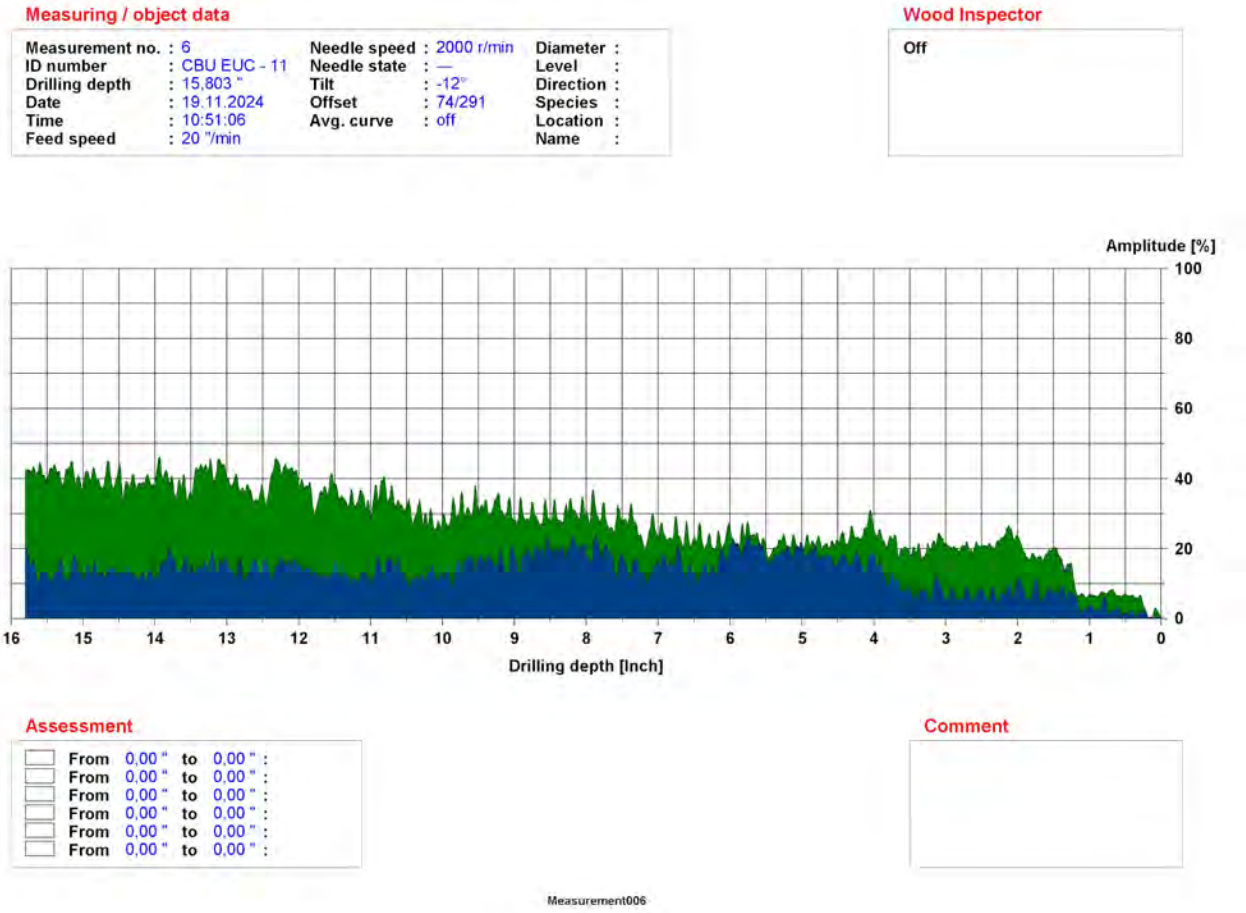


Figure 17: Resistograph reading for drilling point 11.

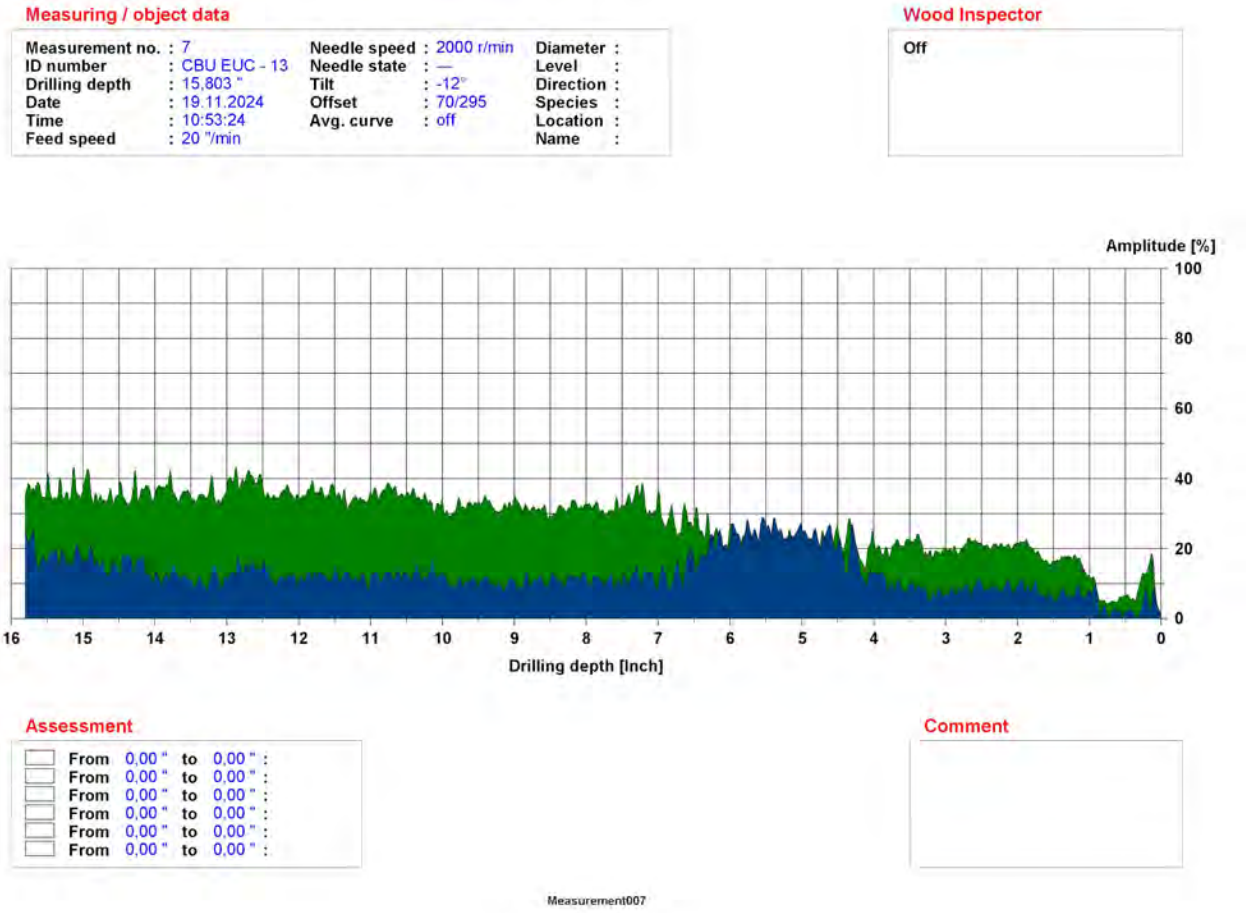


Figure 18: Resistograph reading for drilling point 13.

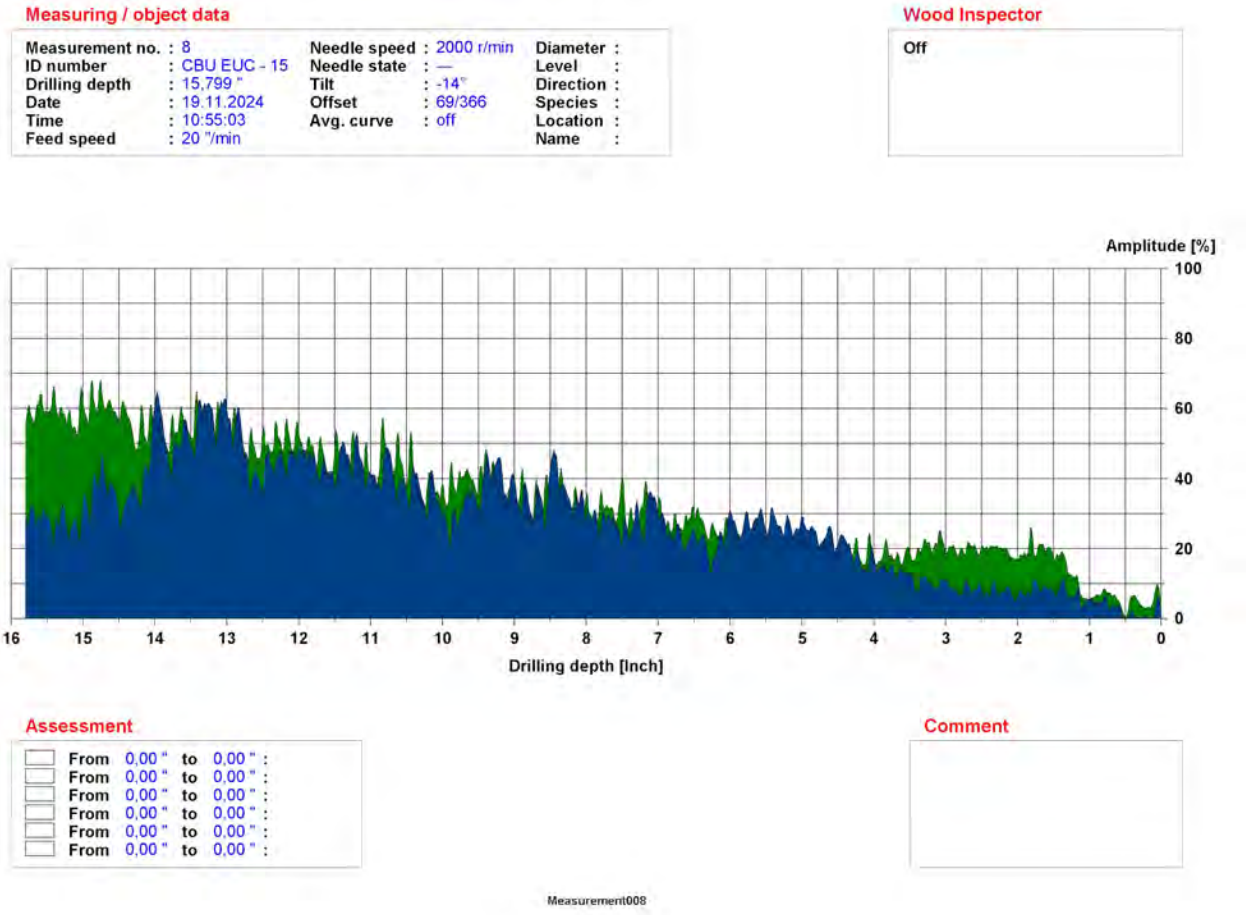


Figure 19: Resistograph reading for drilling point 15.

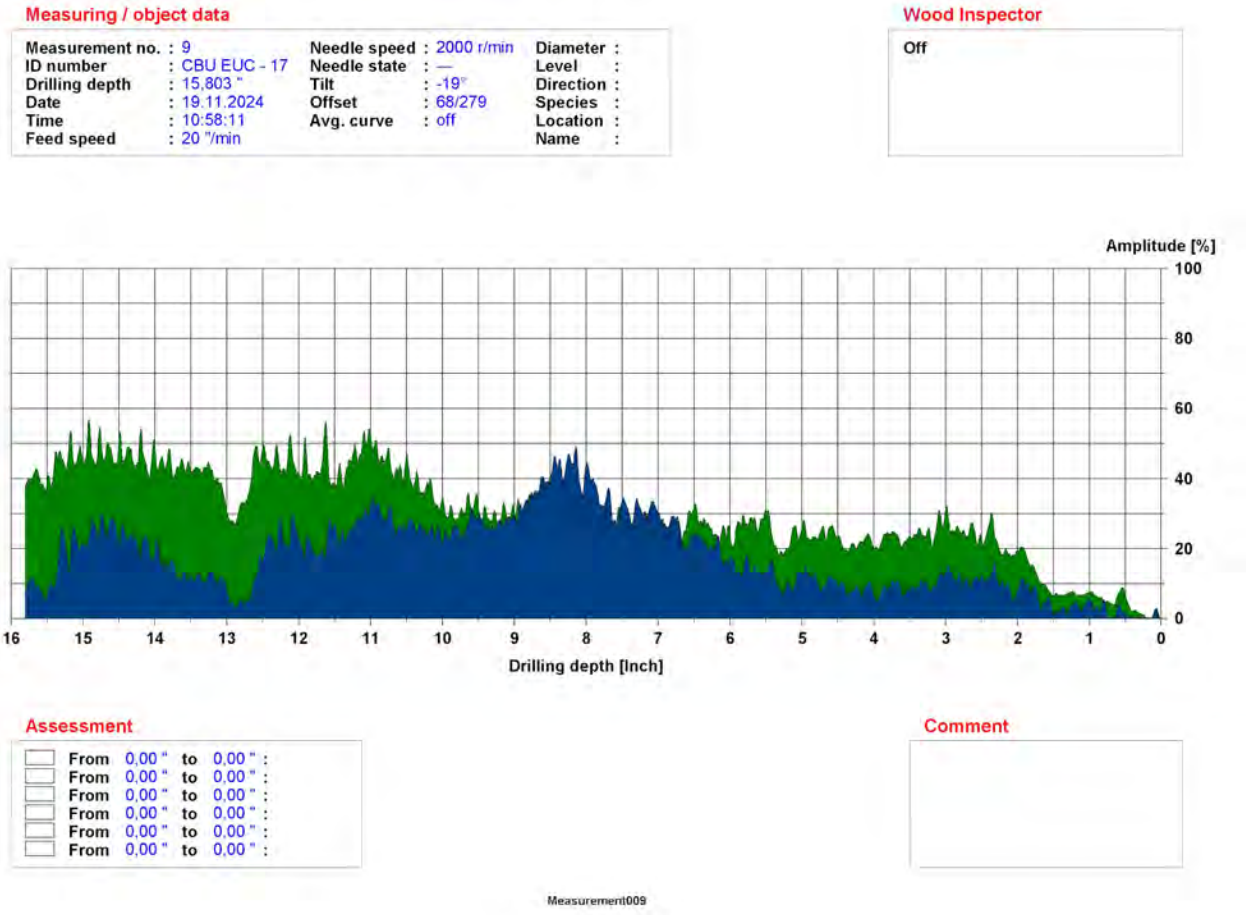


Figure 20: Resistograph reading for drilling point 17.

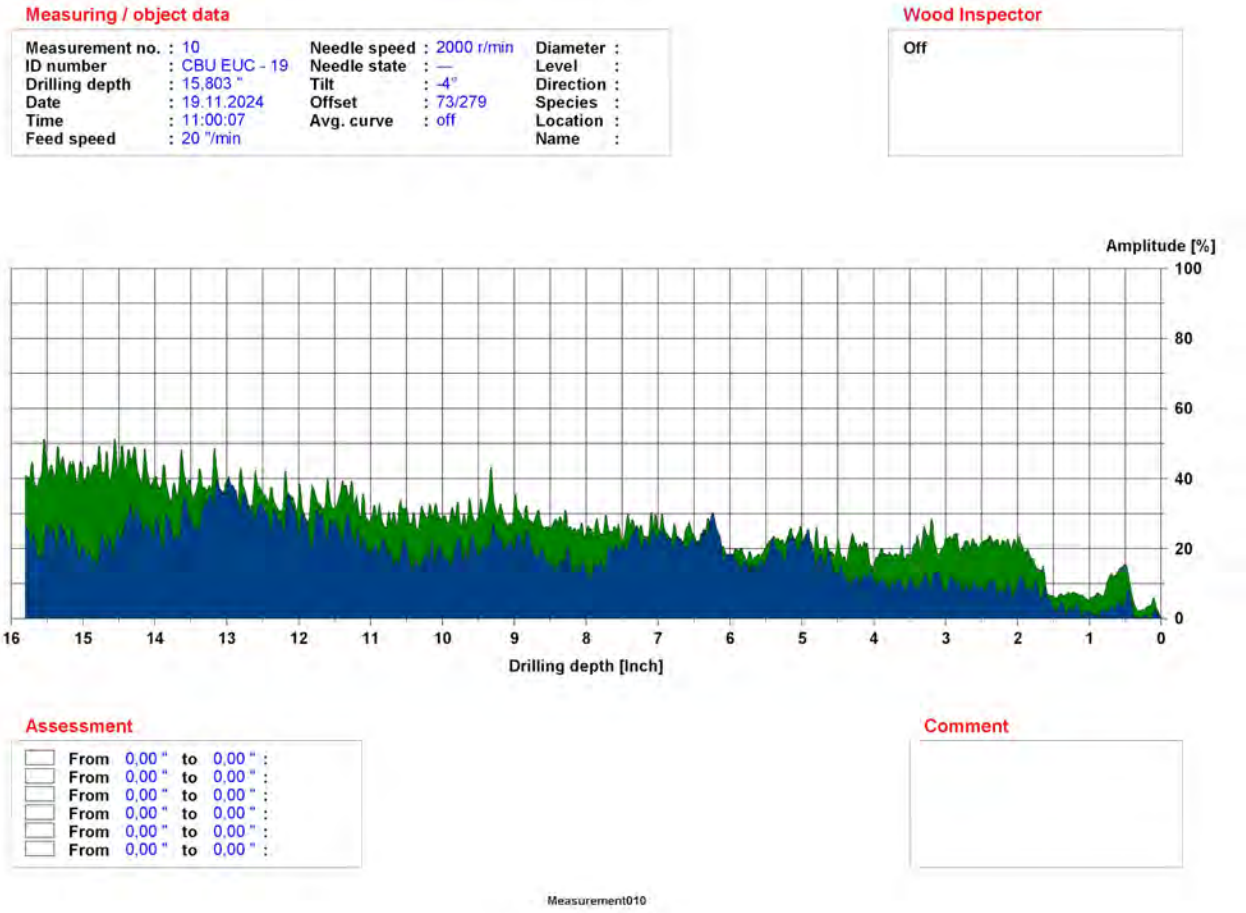


Figure 21: Resistograph reading for drilling point 19.

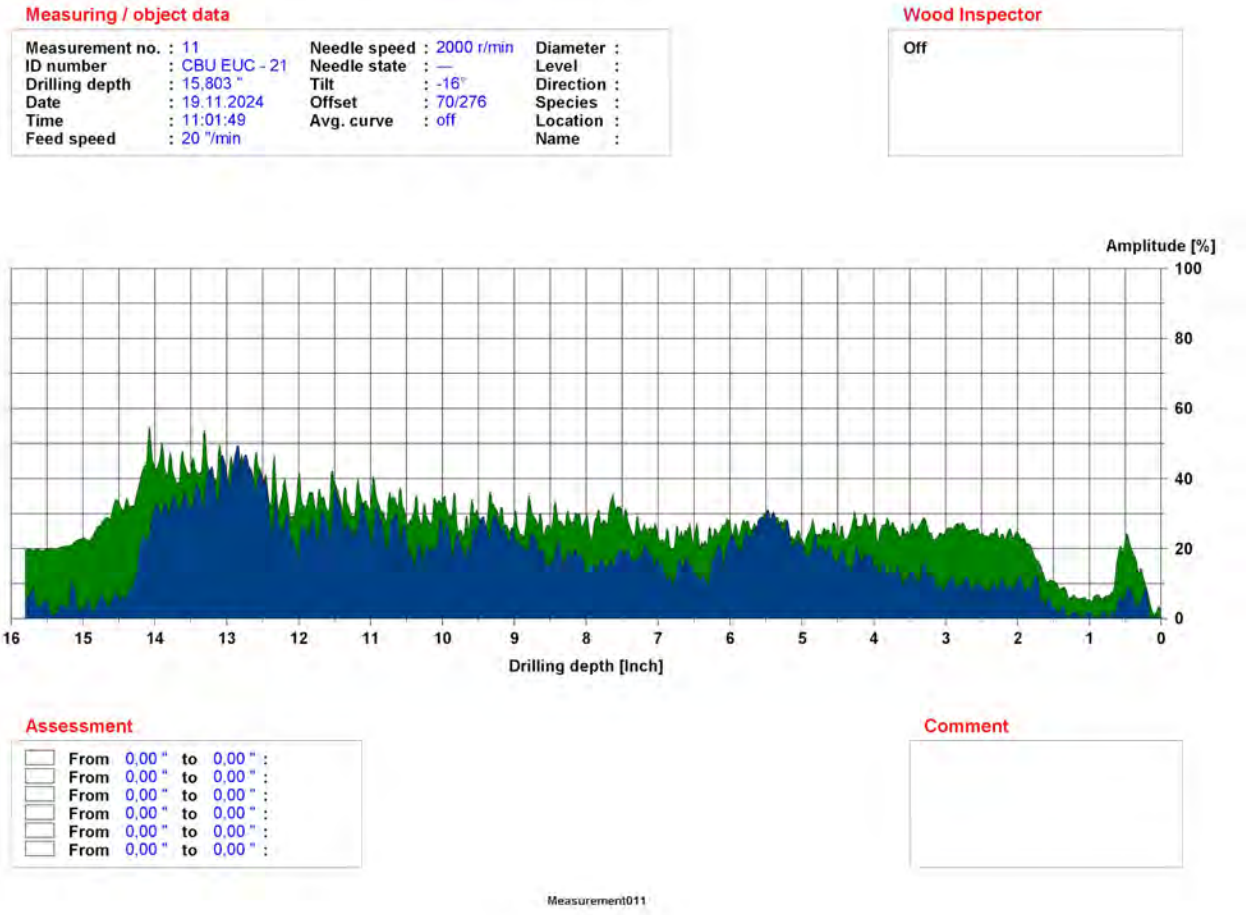


Figure 22: Resistograph reading for drilling point 21.

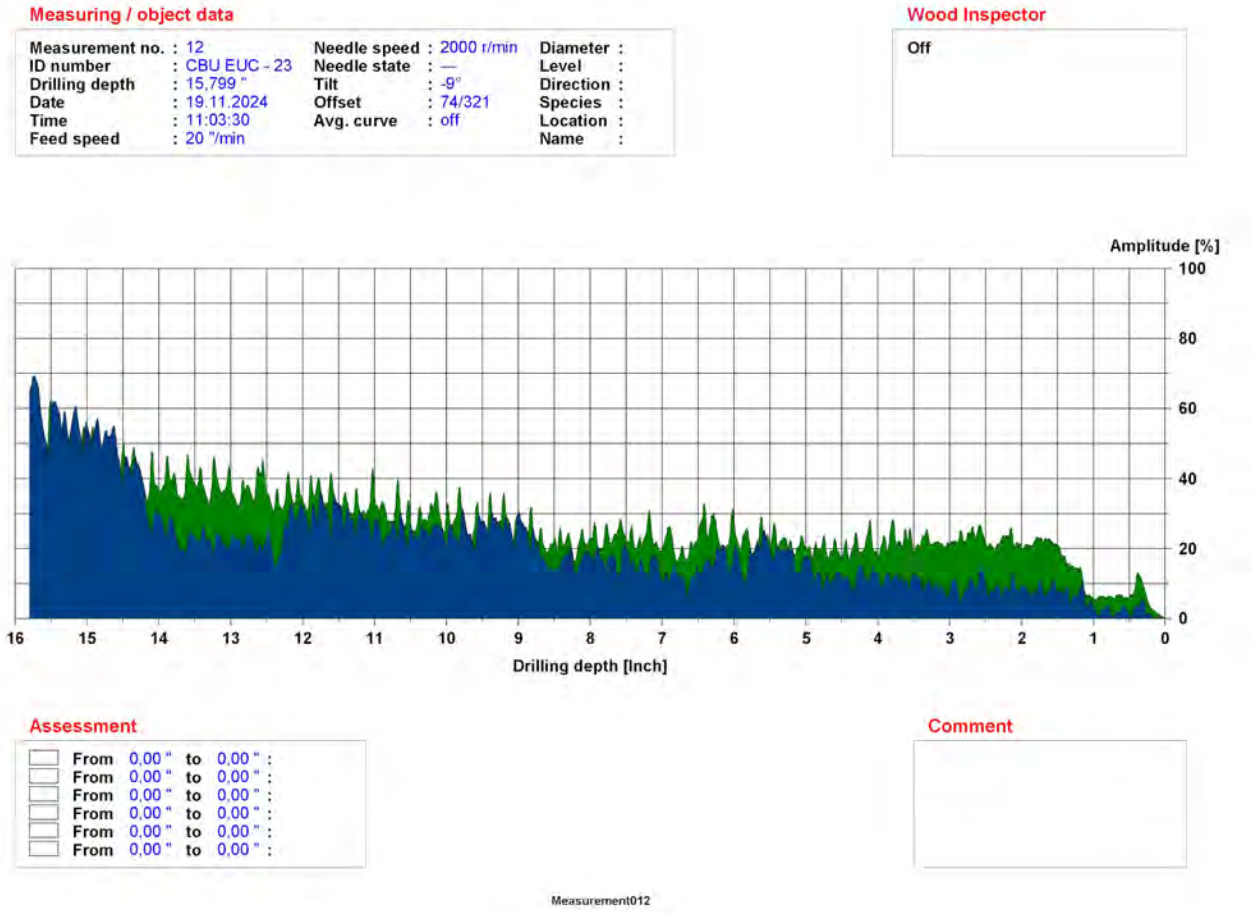


Figure 23: Resistograph reading for drilling point 23.

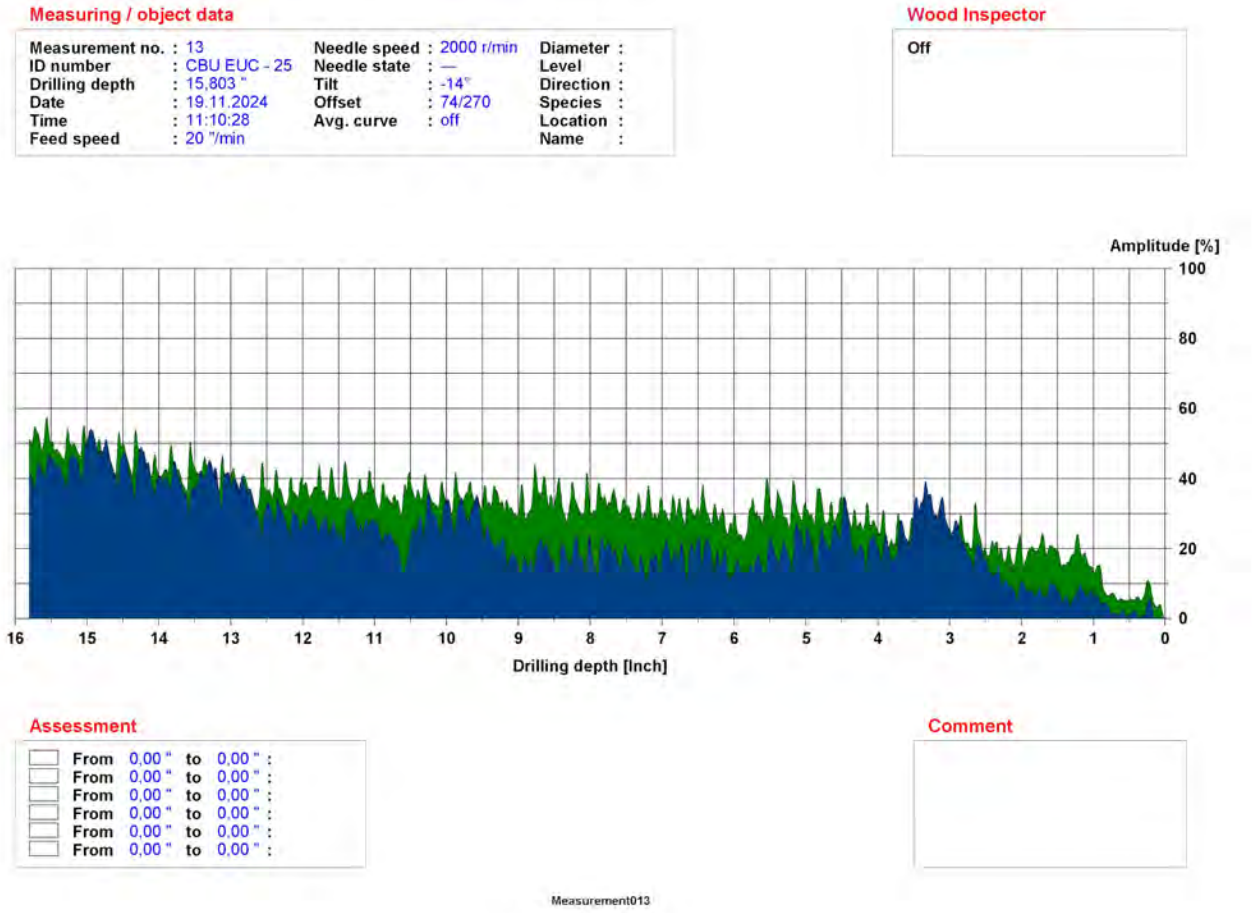


Figure 24: Resistograph reading for drilling point 25.

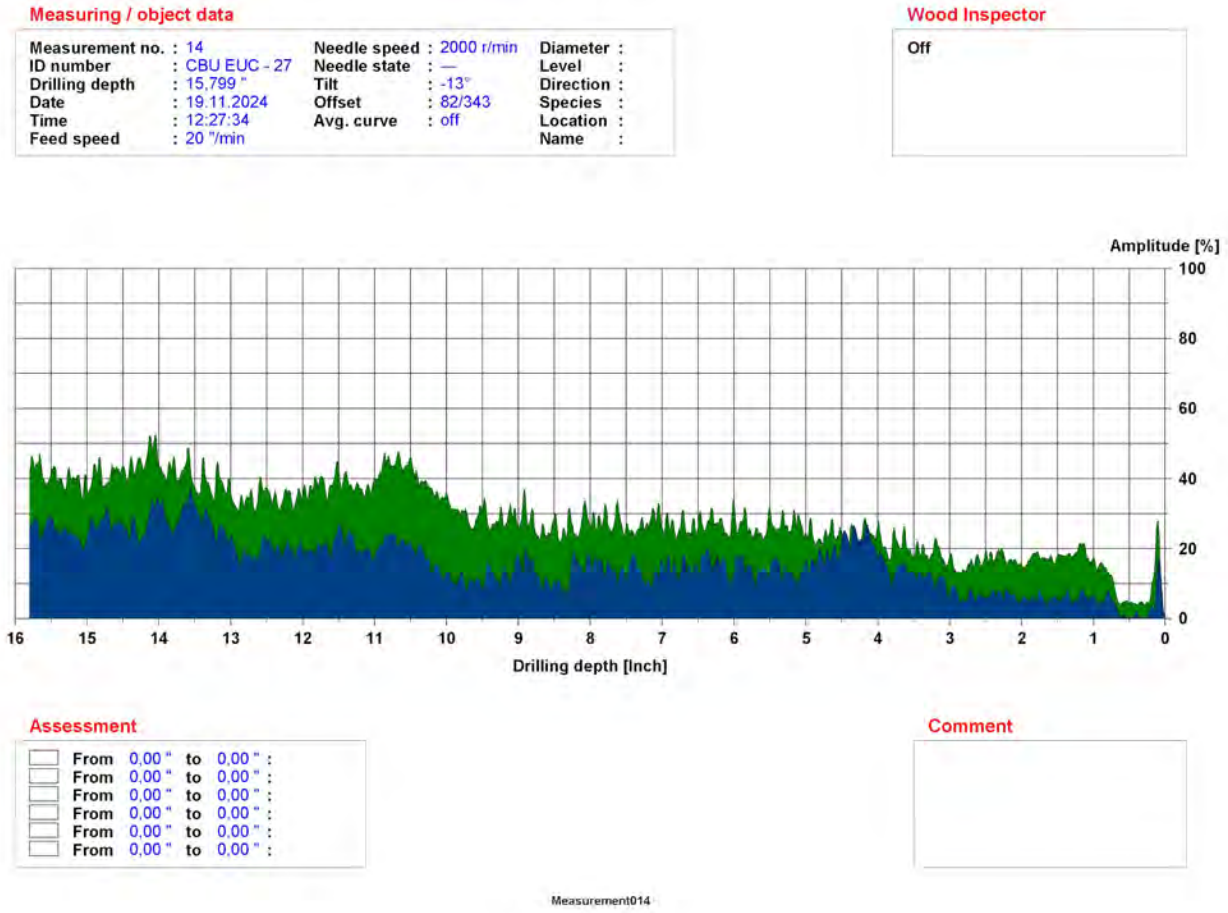


Figure 25: Resistograph reading for drilling point 27.

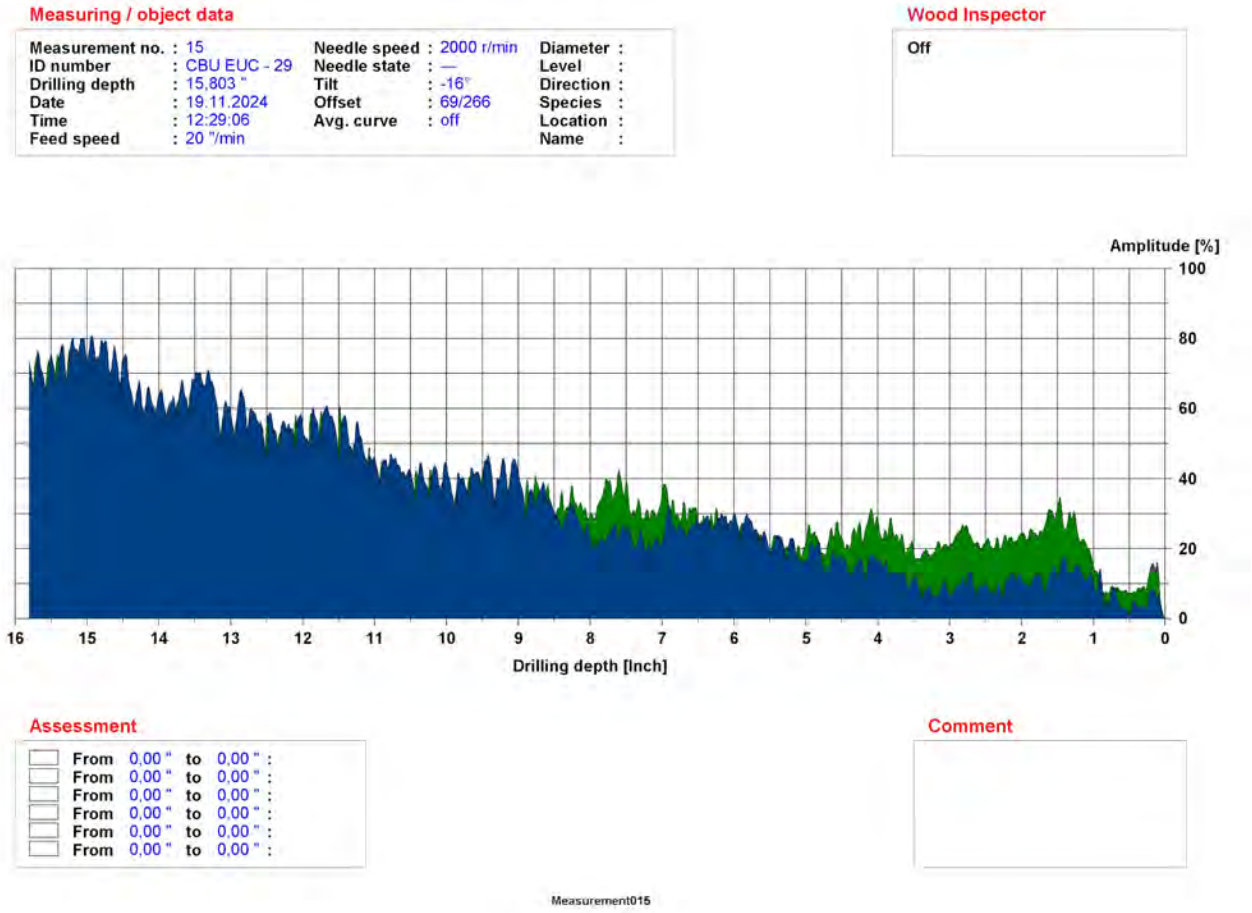


Figure 26: Resistograph reading for drilling point 29.

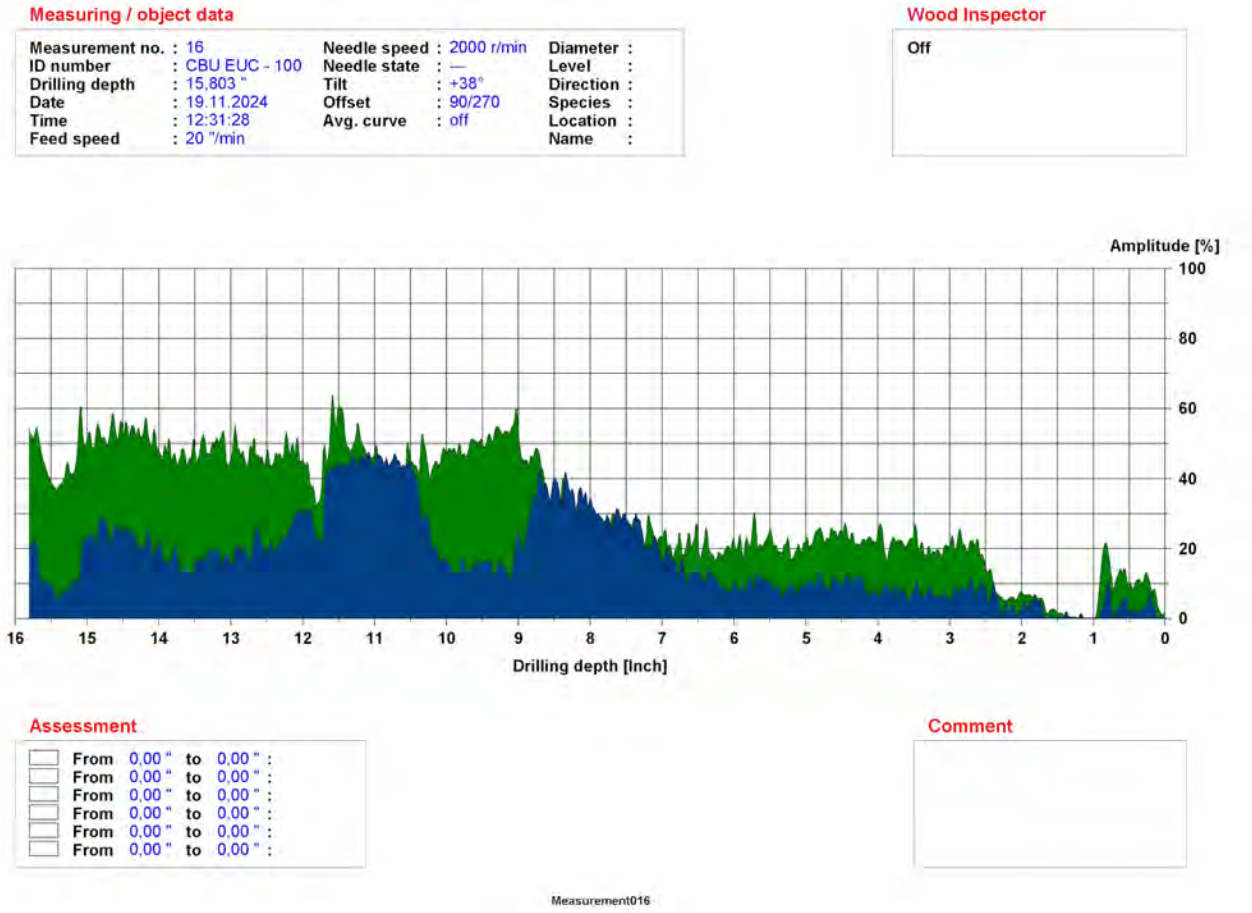


Figure 27: Resistograph reading for the area below the lowest limb.

# APPENDIX D

## ASSUMPTIONS & LIMITING CONDITIONS

While trees vary in their tolerance to changed conditions, disruption in any form of the environment to which the trees have grown accustomed may result in adverse reaction. Human activity among and near trees is inherently contrary to tree welfare and there are inherent risks associated. The following are limitations to this report:

- All information presented herein covers only the trees examined at the area of inspection, and reflects the conditions observed of said trees at the time of inspection.
- The assessments provided in this report are valid for a period of six months from date of delivery to client, and address the probable stability of the subject trees only during ordinary weather conditions.
- Observations were performed visually without probing, dissecting, coring, or exaction, unless noted above, and in no way shall the observer be held responsible for any defects that could have only been discovered by performing said services in specific area(s) where a defect was located.
- No guarantee or warranty is made, expressed or implied, that defects of the trees inspected may not arise in the future.
- No assurance can be offered that if the recommendations and precautionary measures are accepted and followed, that the desired results may be attained.
- No responsibility is assumed for the methods used by any person or company executing the recommendations provided in this report.
- The information provided herein represents an opinion, and in no way is the reporting of a specified finding, conclusion, or value based on the retainer.
- This report is proprietary to Monarch Environmental, Inc., and may not be reproduced in whole or part without written consent. This report has been prepared exclusively for use of the parties to which it has been submitted.
- Should any part of this report be altered, damaged, corrupted, or lost the entire evaluation shall be invalid.
- The information contained in this report is valid for a period of one year, unless otherwise noted.

**ATTACHMENT C: UPDATED DPR FORM**

At the request of California Baptist University, Wilkman Historical Services prepared an analysis of the Hawthorne Residence and a eucalyptus tree that was included as a contributor to the Hawthorne Residence Landmark designation. As a result of that analysis, it was found that the tree fails three tests of a resource's qualification to be designated a contributor to a historic resource. First, it does not meet the City of Riverside's qualifying criteria for designation as a historic resource; second, it does not qualify as a contributor to a historic resource; and third it does not retain sufficient integrity to be designated a historic resource. Below is an analysis of these three factors.

**a. Criteria for Designation**: Based on an evaluation by JMRC, the Hawthorne Residence and eucalyptus tree were found to be eligible for local listing as contributor to the Hawthorne Residence Landmark under Title 20 of the Riverside Municipal Code (Planning Case P11-0663). Applicable criteria supporting its status as a contributor consisted of the following:

Criterion A: **"**Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history" (RMC 20.50.010).

Criterion I: "Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes, or distinctive examples of park or community planning" (Ibid).

Under Criterion A, the JMRC asserts that the residence and tree are vestiges of early residential development along the Magnolia Avenue corridor; and that the tree is likely the last extant specimen associated with the earliest development of the subject property (Planning Case P11-0663).

WHS notes that, while the tree may be the last extant specimen associated with the earliest development of the property, significant urban development has occurred in the 870 feet between it and the residence and, thus, it is no longer significantly associated with the Hawthorne Residence.

Under Criterion I, JMRC notes that urban development has largely replaced the agricultural development once associated with the Magnolia Avenue corridor. In this regard JMRC asserts that the Hawthorne Residence and related eucalyptus tree represent a relatively intact example of a grove house and is one of the few remaining grove houses that once lined Magnolia Avenue at the turn of the century (Ibid).

WHS believes the residence and tree are not "a relatively intact example of a grove house" intactness involves the elements that combine to represent a coordinated entity. The remoteness of the tree in relation to the residence precludes it from being considered an intact element of the Landmark residence.

**b. Contributor/Noncontributor:** The eucalyptus tree is listed as a contributor to the Hawthorne Residence Landmark designation. Title 20 of the Riverside Municipal Code defines both "contributor" and "noncontributor." These definitions are as follows:

"Contributing feature means a site, improvement, or natural feature that within a Historic District, Neighborhood Conservation Area, or an individually significant property that provides appropriate historic context, historic architecture, historic association, or historic value, or is capable of yielding important information about the period including, but not limited to: streets, curbs, sidewalks, streetlights, street furniture, signs, landscaping, monuments, and works of art, gutters, setbacks, signage, parkway, alleys, walls, fencing, and gates (RMC 20.50.020).

"Non-contributing feature of a Historic District, Neighborhood Conservation Area, or individually significant property means a site, improvement, or natural feature within a Historic District or Neighborhood Conservation Area that does not provide appropriate historic context, historic architecture, historic association or historic value, or is not capable of yielding important information about the period, because that element:

A. Was not present during the district's or area's period of historic significance; or

B. No longer possesses integrity due to alterations, disturbances, additions, or other changes; and

C. Does not independently meet the designation criteria as defined in this title" (Ibid).

WHS looked at the degree to which the tree is a contributor or noncontributor, focusing on the criteria that make a resource a noncontributor. In terms of item A above, the tree was in fact present during the district's period of significance. So this criterion does not apply. However, criteria B and C do apply. In terms of criterion B, there are significant changes to the vicinity of the tree that render it unqualified as a contributor. In terms of item C, as discussed above, the tree does not independently meet the designation criteria of Chapter 20.50.020.

**c. Integrity:** For a resource to qualify for designation as a Landmark, it must retain integrity. Title 20 of the Riverside Municipal code defines integrity as follows: "Integrity means the ability of a cultural resource to convey its significance. To retain integrity a cultural resource must retain most of the aspects that closely relate to the resource's significance including location, design, setting, materials, workmanship, feeling, and association" (RMC, 20.50.010).

WHS believes the eucalyptus tree does not retain sufficient integrity to qualify as a contributor to the Hawthorne Residence. Integrity of design, materials, and workmanship apply to buildings and structures and, thus, do not apply to a natural feature such as the tree in question. Location, setting, feeling and association do apply. While the Riverside Municipal code does not define the aspects of integrity, the National Register of Historic Places provides guidance in regard to the application of these aspects of integrity. These criteria are universally accepted as appropriate

for judging the integrity of a potential resource. Here are excerpts from Bulletin 15 which details how to determine if a resource qualifies for designation in regard to integrity (National Register Bulletin 15, 1997:45).

Location: "Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons" (Ibid).

WHS believes that, while the location of the tree is unchanged, its relationship to its setting has changed significantly. As noted above the "…actual location of a historic property, *complemented by its setting*, is particularly important in recapturing the sense of historic events and persons" (Ibid). Because its setting has been significantly altered, the Hawthorne Residence eucalyptus tree does not meet this criterion.

Setting: "Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space" (Ibid).

As noted above, the setting of the tree has changed significantly. It is no longer in a rural environment, but rather it is in a very urban setting. The presence of campus buildings, parking, and landscaping in the 870 feet between it and the Hawthorne Residence are major detractors to the qualification of the tree as a contributor to the Hawthorne Residence Landmark designation. In this regard, it is noted that the tree cannot even be seen from the residence.

Feeling: "Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character" (Ibid).

WHS believes that the urbanization of the area around the tree detracts from its integrity of feeling. Its remoteness from the Hawthorne Residence is also a negative factor in relation to integrity of feeing.

Association: "Association is the direct link between an important historic event or person and a historic property" (Ibid).

Given the tree's 870 foot distance from the Hawthorne Residence and the presence of landscaping and buildings that obscure the view of the tree from the residence, the tree can no longer seen as an entity that is associated with the residence.

WHS believes that the urbanization of the area around the tree detracts from its integrity of feeling. Its remoteness from the Hawthorne Residence is also a negative factor in relation to integrity of feeing.

In essence, then, although the tree is no doubt historically related to the Hawthorne Residence, the distance it is from the residence and the urban development and landscaping between the tree and the residence render its relationship to the residence very weak. The following factors come into play here:

1. It does not meet the criteria for designation as a historic resource.



2. It does not meet three of the four integrity criteria (location, setting, and feeling) that apply to a natural feature.

3. It meets items B and C of the definition of a noncontributor.

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City of Riverside Planning Case P11--0196

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