

July 29, 2022

Don Lee and Thu Mai 833 E. Walnut Avenue Burbank, CA 91501

Re: Historic Building Evaluation

Jenkins Building, 9502-9506 Magnolia Avenue/3790 Van Buren Boulevard

City of Riverside, Riverside County, California

Planning Case PR-2021-001079; CRM TECH Project No. 3748

Dear Mr. Lee and Ms. Mai:

At your request, we have completed a historic building study on the Jenkins Building at 9502-9506 Magnolia Avenue and 3790 Van Buren Boulevard in the City of Riverside, a 1910-vintage commercial building that has sustained extensive fire damages in June 2020. As you know, the building was previously evaluated during a community-wide cultural resources survey in 2003 and found to qualify as a "historical resource" under provisions of the California Environmental Quality Act (CEQA) at that time (Tang et al. 2003; Tibbet and Tang 2003; see App. 1).

Following the fire damages to the building, the City of Riverside required this study as part of the design review process for its repairs and rehabilitation before a Certificate of Appropriateness can be issued pursuant to CEQA and Title 20 (Cultural Resources Ordinance) of the Riverside Municipal Code (RMC). The purpose of the study is to determine if the Jenkins Building retains sufficient character-defining features after the fire to convey the previously established historic significance and thereby continues to be a "historical resource" for CEQA-compliance purposes.

The study was completed by CRM TECH principal investigator Bai "Tom" Tang, M.A., and project historian/architectural historian Terri Jacquemain, M.A., both of whom meet and exceed the Secretary of the Interior's Professional Qualification Standards for Architectural History (see App. 2). The scope of the study included a review of all existing cultural resources documentation on the Jenkins Building and a field inspection of the building in its current conditions. This letter presents a summary of the findings and conclusion of the study.

Documentation Review

During the 2003 survey, the Jenkins building (Fig. 1) was found to be ineligible for listing in the National Register of Historic Places or the California Register of Historical Resources but eligible for designation by the City of Riverside as a local "landmark" because it was a largely intact and the best-known historical commercial building in the heart of what was once the town of Arlington as well as an example of the work of influential local architect/builder G. Stanley Wilson (Tang et al. 2003; Tibbet and Tang 2003:2; see App. 1). As such, it met CEQA definition of a "historical resource" (see PRC §5020.1(j) and Title 14 CCR §15064.5(a)(1)-(3)). The 2003 conclusion was reiterated the next year during a study for a proposed widening of Van Buren Boulevard (Tang and Hogan 2004:9).

Tel: 909 824 6400 Fax: 909 824 6405



Figure 1. The Jenkins building as it appeared in 2003.

As a part of the 2003 survey, the Jenkins Building was formally recorded on the State of California's standard record forms that have since been on file at the City of Riverside (Tibbet and Tang 2003; see App. 1). The description of the building notes that the façades facing Magnolia Avenue and Van Buren Boulevard were "more elegant and detailed than others in the vicinity," with the most notable features being the "widely overhanging cornice along the edges of the flat roof, richly adorned with modillions of two different sizes at regular intervals" (Tibbet and Tang 2003:1; see App. 1).

Based on the results of the 2003 survey, the City of Riverside further determined that the historical Arlington downtown commercial district was eligible for designation as a "neighborhood conservation area," as provided by the City ordinance. As delineated at the time, the Arlington Village Commercial Neighborhood Conservation Area encompassed the Magnolia Avenue corridor between Roosevelt and Castleman Streets (9408-9595 Magnolia Avenue), with the Jenkins Building identified as a contributing element (Tang and Hogan 2004:9-10).

The neighborhood conservation area was never officially designated by the City before an amendment to the Cultural Resources Ordinance in 2010 eliminated that category of designation. While the neighborhood in question remains a potential candidate for consideration by the City as a "historic district" pursuant to RMC §20.50.010(O), the determination of its qualifications would require a systematic re-survey of the entire neighborhood to assess its current conditions, as the 2003 survey is now nearly 20 years old, and an evaluation under a different set of criteria. These endeavors, however, are well beyond the scope of statutory/regulatory-compliance concerns over the repairs and rehabilitation of the Jenkins Building and the responsibilities of its owners.

Field Inspection

The field inspection of the Jenkins Building was carried out by Terri Jacquemain on June 15, 2021. Field observations confirmed that repairs to the building were underway, and the second story had by then been entirely removed while an approximately three-foot-tall, unfinished wood frame had been erected along the perimeter at the top of the ground floor (Fig. 2). The surviving ground-floor façades remained similar to what was observed during the 2003 survey, when past alterations to the exterior were already evident in bricks painted yellow-tan or covered by stucco, with the upper portion covered by wooden sign panels over an assemblage of plate-glass storefront windows and steel-framed glass doors below. The original brick exterior at the rear of the building was crumbling

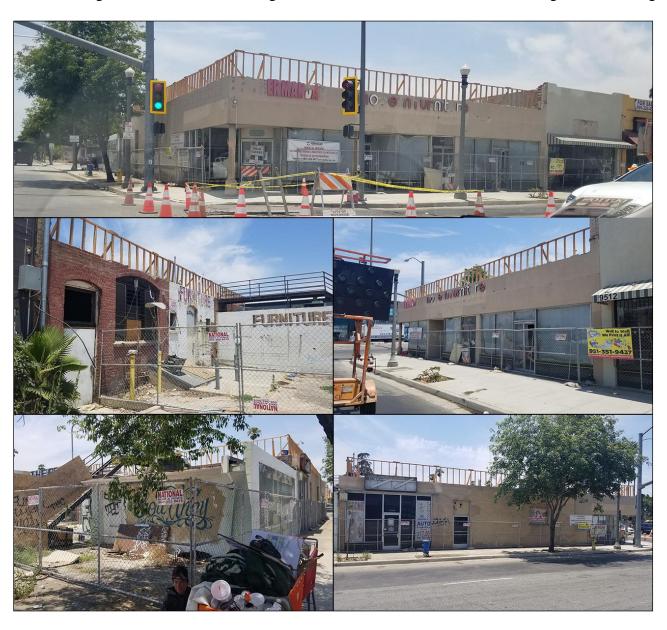


Figure 2. Post-fire condition of the Jensen Building. *Clockwise from top*: overview of both street-facing facades, to the southwest; Magnolia Avenue façade, view to the southeast; Van Buren Boulevard façade, view to the west; rear addition to the building, view to the north; rear façade, view to the northeast. (Photographs taken on June 15, 2021)

in spots, but two arched entryways, a large arched window opening, and two smaller square ones are still intact, as is the one-story concrete block addition at the southeastern corner of the building.

Discussion and Conclusion

Based on documentation and photographic records from the 2003 survey, the character-defining architectural features that embodied the historic integrity and significance of the Jenkins Building at the time were concentrated primarily on the upper level of the two street-facing façades. In particular, the ornamental treatment of the roof line and the continuous row of wood-framed windows on the second floor conveyed the original design of the building and a distinctive sense of the period of origin (Fig. 1). The wall cladding and metal-framed windows and doors on the first floor, in contrast, were the results of later alterations, which postdated the building's period of significance, namely the 1890-1913 era, by at least a half century (see App. 1). Reflecting common modern building practice that began to prevail in the 1960s-1970s, these elements did not contribute to the significance of the building. Rather, they represented past compromises to the building's historic integrity in terms of design, materials, workmanship, and feeling.

Unfortunately, after the fire in 2020, the City of Riverside Building Official determined the heavily damaged second story to be a major and immediate threat to public safety, which provided an overriding consideration for potential environmental concerns, including those related to cultural resources, under CEQA provisions. In the subsequent repair effort to eliminate such threat, the upper level of the building was removed in its entirety, and none of the original features identified above as the embodiment of the building's historic character remain extant today, leaving only the lower level with its extensively altered street-facing façades and relatively plain, utilitarian secondary façades (Fig. 2).

In its current condition, the Jenkins Building no longer retains sufficient historic integrity to relate to the early 20th century development of the town of Arlington or to G. Stanley Wilson's original architectural design. Consequently, it no longer appears eligible for designation as a City of Riverside "landmark" pursuant to the criteria outlined in RMC §20.50.010(U), nor does it appear to meet the criteria for designation in a secondary category, "structure or resource of merit," as outlined in RMC §20.50.010(FF). In particular, Criteria 4 and 6 provide that a potential "landmark" that does not exhibit a high level of integrity but retains sufficient integrity to convey significance would be eligible for the status of a "structure or resource of merit" (RMC §20.50.010(FF)). In this case, however, the nearly total loss of its character-defining architectural features has left the Jenkins Building with little integrity to meet these criteria.

For the same reason, the Jenkins Building no longer contribute materially to the historical fabrics of the neighborhood unless the upper level of the building is fully restored and replicated in accordance with the Secretary of the Interior's *Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings* (Weeks and Grimmer 2017:225-238). However, the Jenkins Building does not appear to meet all of the criteria for reconstruction to be considered a preferred treatment for historic buildings. Due to its advanced age, no architectural drawings or other similar documentation are known to have survived from the original construction in 1910, nor were any detailed, intensive-level graphic/photographic recordation of the characteristics of the building undertaken in the past studies on the building (Tang et al. 2003). As a result, the Jenkins Building lacks sufficient

documentation to ensure an accurate reproduction of its non-surviving features, as required by the Secretary of the Interior's Standards (*ibid*.:228).

In addition, the Secretary of the Interior's Standards specify that reconstruction should be reserved for such cases where physical replication of architectural elements is necessary to understand and interpret a property's historic value and where no other property known for similar historical associations has survived (Weeks and Grimmer 2017:228). The Jenkins Building, one of many surviving commercial buildings in the former downtown area of Arlington (albeit arguably among the most prominent ones) and one of many surviving works of G. Stanley Wilson in Riverside (and arguably among the less prominent ones), does not appear to meet either of these criteria.

Furthermore, the highly localized level of historic significance of the Jenkins Building does not appear to justify the substantial cost and technical expertise necessary to achieve the accurate duplication of original features in materials, design, color, and texture in accordance with the Secretary of the Interior's Standards (Weeks and Grimmer 2017:226). Based on these considerations, it is our opinion that the Jenkins Building no longer retains sufficient historical characteristics to convey its significance, either individually or as a contributor to a potential historic district. As such, it does not appear eligible, in its current condition, for local historical designation by the City of Riverside and thus does not meet CEQA's definition of a "historical resource."

Thank you for this opportunity to be of service. If you have any questions or need any further information, please do not hesitate to contact me and my staff at (909) 824-6400.

Sincerely,

Bai "Tom" Tang, M.A. Principal, CRM TECH

References Cited:

Tang, Bai "Tom," Jennifer A. Mermilliod, and Casey Tibbet

2003 Historic Resources Survey of the Arlington Neighborhood, City of Riverside, Riverside County, California. On file, Eastern Information Center, University of California, Riverside. Tang, Bai "Tom," and Michael Hogan

2004 Historical/Archaeological Resources Survey Report: Van Buren Boulevard Widening Project, Andrew Street to Garfield Avenue, Arlington Area, City of Riverside, Riverside County, California. On file, Eastern Information Center, University of California, Riverside.

Tibbet, Casey, and Bai "Tom" Tang

2003 California Historical Resources Inventory record forms, Jenkins Building at 9502-9506 Magnolia Avenue. On file, Community and Economic Development Department, Planning Division, City of Riverside.

Weeks, Kay D., and Anne E. Grimmer

2017 The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings; revised by Anne E. Grimmer. Technical Preservation Services, National Park Service, U.S. Department of the Interior, Washington, D.C.

APPENDIX 1:

CALIFORNIA HISTORICAL RESOURCES INVENTORY RECORD FORMS

(2003)

State of California - The Resources Agency Primary # **DEPARTMENT OF PARKS AND RECREATION** HRI# PRIMARY RECORD Trinomial Other Listings NRHP Status Code 5D2 **Review Code** Reviewer Page 1 of 2 *Resource Name or #: (Assigned by Recorder) 9502-9506 MAGNOLIA P1. Other Identifier: *P2. Location: Not for Publication × Unrestricted *a. County Riverside and (P2b and P2c or P2d. Attach a location map as necessary.) *b. USGS 7.5' Quad Date ____; R___; _ __ 1/4 of ___ 1/4 of Sec c. Address 9502 MAGNOLIA AV City Riverside _ Zip d. UTM: (Give more than one fr large and/or linear resources) Zone e. Other Locational Data: APN: 234112004 *P3a. Description: (Describe resource and its major elements. Include design, materials, condition, afterations, size, setting, and boudnaries) This two-story commercial building is situated on the southerly corner of the intersection of Magnolia Avenue and Van Buren Boulevard, in the heart of Arlington's once thriving commercial district. It is a box-shaped brick masonry structure that presents two strikingly different appearances. The two façades facing Magnolia Avenue and Van Buren Boulevard are much more elegant and elaborate in decorative details than the other two elevations, and indeed than any other commercial buildings in the vicinity. The most notable feature in these two façades is the widely overhanging cornice along the edges of the flat roof, richly adorned with modillions of two different sizes at regular intervals. The upper floor is fenestrated with a continuous row of woodframed, fixed windows, each with a large pane surrounded by five smaller panes. The lower level, which is covered with stucco in the two principal façades, features aluminum-framed windows and doors of much more recent vintages. The two elevations facing away from the street are evidently more original in appearance, characterized by unclad and unpainted brick walls punctuated by gently arched window openings filled with rectangular, wood-framed double-hungs with plain, single-pane sashes. *P3b. Resource Attributes: (List Attributes and codes) HP06 1-3 Story Commercial Building ☑ Building ☐ Structure ☐ Object ☐ Site ☐ District ☑ Element of District ☐ Other (isolates, etc.) *P4. Resources Present: P5b. Description of Photo: (View, date, accession #) *P6. Date Constructed: Age and Sources: X Historic ☐ Prehistoric ☐ Both *P7. Owner and Address: not available Riverside CA 'P8: Recorded by: Casey Tibbet Bai Tom Tang, M.A CRM Tech 4472 Orange Street Riverside P9. Date Recorded: 09/15/2003 P10. Survey Type: (Describe) Intensive Survey *P11. Report Citation: (Cite survey report and either sources, or enter *nane.*) Historic Resources Survey of the Arlington Neighborhood, City of Riverside, California, September 2003, CRM TECH., Riverside, CA NONE Location Map Sketch Map Continuation Sheet V Building, Structure, and Object Record Archaeological Record
District Record
Linear Reature Record
Milling Station Record
Rock Art Record Artifact Record Photograph Record Other (List)

State of California	a - The Resources Agency	Primary #
		HRI#
	RUCTURE, AND OBJECT RECORD	MAN (III)
Page 2 of 2		us Code: 5D2
D4 Uistaria Nama -		d by Recorder) 9502-9506 MAGNOLIA AV
B2. Common Name	Jenkins Building	- Inna-
	The state of the s	4. Present Use: Commercial
*B5. Architectural S	Style: Tri-partite Commercial	
*B6. Construction H	listory: (construction date, atterations, and date of alterations)	
	iginal Permit Permit #B-523; Brick wer Permit #4419; Sewer	c Block
1925 56*	ver remmit #4415, Sewer	
*B8. Related Feature		h Buildon Nilson C Charles
	Theme: Early Commercial Developme	b. Builder: Wilson, G. Stanley
	•	Property Type Commercial
Applicable Criteri		
(Discuss importance in term	is of historical or architectural context as defined by theme, period, ar	nd geographic scope: Also address integrity.)
building to have these reasons, t Riverside as a "	e survived from the historic period in the Jenkins building has been determine "landmark," as provided in the City's C	
persons or event and built by G. prolific career in which capacit example of Wilso Simon's Mortuary which was general architecture dur National Registe	ts of recognized significance in nation Stanley Wilson, the Jenkins building d as a builder and building designer, we ty he left the most tangible legacy in on's works, which include such prominency. Nor is it representative of a partially identified with bungalows during tring his most productive years. Based er and California Register eligibility,	ded to identify a close association with any mal, state, or local history. Although designed dates to the early years of Wilson's long and will before he became a licensed architect in 1923, local history. It is by no means an important at landmarks as the Mission Inn Rotunda and cular phase, theme, or aspect of Wilson's career, the early period and with Spanish-influenced on official guidelines for the evaluation of the Jenkins building does not appear eligible as or the California Register of Historical
B11. Additional Reso	purce Attributes: (List attributes and codes)	APTEC 4 C 4 C 4 C 4 C 4 C 4 C 4 C 4 C 4 C 4
*B12. References:	2	
City of Riversic records, City Di	de Building Permits, Tract Maps, Metros irectories	scan
B13. Remarks:		
F44000 125 1 15 7 8		
	ai Tom Tang, M.A.	
·	RM Tech	
	472 Orange Street iverside	
*Date of Evaluation		
(This space reserved	d for official comments.)	

APPENDIX 2: PERSONNEL QUALIFICATIONS

PRINCIPAL INVESTIGATOR, HISTORY/ARCHITECTURAL HISTORY Bai "Tom" Tang, M.A.

Education

1988-1993	Graduate Program in Public History/Historic Preservation, University of California,
	Riverside.
1987	M.A., American History, Yale University, New Haven, Connecticut.
1982	B.A., History, Northwestern University, Xi'an, China.
2000	"Introduction to Section 106 Review," presented by the Advisory Council on Historic
	Preservation and the University of Nevada, Reno.
1994	"Assessing the Significance of Historic Archaeological Sites," presented by the
	Historic Preservation Program, University of Nevada, Reno.

Professional Experience

2002-	Principal Investigator, CRM TECH, Riverside/Colton, California.
1993-2002	Project Historian/Architectural Historian, CRM TECH, Riverside, California.
1993-1997	Project Historian, Greenwood and Associates, Pacific Palisades, California.
1991-1993	Project Historian, Archaeological Research Unit, University of California, Riverside.
1990	Intern Researcher, California State Office of Historic Preservation, Sacramento.
1990-1992	Teaching Assistant, History of Modern World, University of California, Riverside.
1988-1993	Research Assistant, American Social History, University of California, Riverside.
1985-1988	Research Assistant, Modern Chinese History, Yale University.
1985-1986	Teaching Assistant, Modern Chinese History, Yale University.
1982-1985	Lecturer, History, Xi'an Foreign Languages Institute, Xi'an, China.

Cultural Resources Management Reports

Preliminary Analyses and Recommendations Regarding California's Cultural Resources Inventory System (with Special Reference to Condition 14 of NPS 1990 Program Review Report). California State Office of Historic Preservation working paper, Sacramento, September 1990.

Numerous cultural resources management reports with the Archaeological Research Unit, Greenwood and Associates, and CRM TECH, since October 1991.

PROJECT HISTORIAN/ARCHITECTURAL HISTORIAN Terri Jacquemain, M.A.

Education

2004	M.A., Public History and Historic Resource Management, University of California,
	Riverside.
2002	B.S., Anthropology, University of California, Riverside.
2001	Archaeological Field School, University of California, Riverside.
1991	A.A., Riverside Community College, Norco Campus.

Professional Experience

2003-	Historian/Architectural Historian/Report Writer, CRM TECH, Riverside/Colton,
	California.
2002-2003	Teaching Assistant, Religious Studies Department, University of California,
	Riverside.
2002	Interim Public Information Officer, Cabazon Band of Mission Indians.
2000	Administrative Assistant, Native American Student Programs, University of
	California, Riverside.
1997-2000	Reporter, Inland Valley Daily Bulletin, Ontario, California.
1991-1997	Reporter, <i>The Press-Enterprise</i> , Riverside, California.

Membership

California Preservation Foundation.