

MONTEREY COUNTY HISTORIC RESOURCES REVIEW BOARD

Thursday, February 3, 2022 11:30 a.m.
Monterey County Government Center
1441 Schilling Place, Salinas, CA 93901
Via Teleconference/Zoom

REGULAR MEETING

AGENDA

IMPORTANT NOTICE REGARDING COVID-19 AND PARTICIPATION IN THE HISTORIC RESOURCES REVIEW BOARD MEETING

NOTICE IS HEREBY GIVEN that the Historic Resource Review Board of the County of Monterey, State of California will hold a public hearing to consider the project described below. The hearing will be held on **Thursday, February 3, 2022** at the hour of **11:30 a.m.** This meeting will be held by teleconference to minimize the spread of the COVID-19 virus, in accordance with the State of Emergency proclaimed by Governor Newsom on March 4, 2020, Government Code section 54953 as amended by AB 361, and the Monterey County Health Officer recommendation of social distancing measures for meetings of legislative bodies.

Participate via Zoom Meeting Link:

<https://montereycty.zoom.us/j/93415405671?pwd=YnZpQXNndDU5TmdJSVJ0ZmcraWljUT09&from=addon>

Participate via Phone: 1-669-900-6833

Meeting ID Access Code: 934 1540 5671

Password (if required): 594890

Public Participation Instructions:

The meeting will be conducted via teleconference using the Zoom program, and Board Members will attend electronically or telephonically. The meeting will have no physical location to physically attend. The public may observe the Zoom meeting via computer by clicking on the meeting link listed above, or the public may listen via phone by dialing the phone number listed above and then when prompted, entering the Meeting ID Access Code listed above as well. You will be asked for a "Participant ID". You do not need a Participant ID to join the meeting, press the pound key (#) again and you will be automatically connected.

Members of the public may wish to comment on a specific agenda item while the matter is being heard.

When the Chair calls for public comment on an agenda item, they will then call on speakers and unmute their device one at a time. Public speakers may be broadcast in audio form only.

Members of the public who wish to make a general public comment for items not on the day's agenda may submit their comment via email, preferably limited to 250 words or less, to HernandezE7@co.monterey.ca.us .

Individuals with disabilities who desire to request a reasonable accommodation or modification to observe or participate in the meeting may make such request by sending an email to support staff at HernandezE7@co.monterey.ca.us . The request should be made no later than 2:00 p.m. on the Wednesday prior to the meeting date in order to provide time for the County to address the request.

CALL TO ORDER

ROLL CALL

APPROVAL OF MINUTES

1. HRRB Meeting Minutes from January 6, 2022.

PUBLIC COMMENT

The Historic Resources Review Board (HRRB) will receive public comment on non-agenda items within the purview of the HRRB. The Chair may limit the length of individual presentations.

PROJECT REVIEW

1. **Project:** PLN190140 – MID VALLEY PARTNERS LLC (MID VALLEY SHOPPING CENTER)
Project Location: 9550 Carmel Valley Rd, Carmel
Assessor's Parcel No.: 169-234-007-000
Planning Area: Carmel Valley Master Plan
Project Description: Facade upgrades and site improvements at the Mid Valley Shopping Center including:
 - New paint around the window trims and roof fascia;
 - Wrapping select aggregate concrete columns in a hardy board material that mimics rough-sawn siding;
 - Removal of the "breezeway" or overhead roof element connecting Buildings A and C;
 - Removal of portions of the roof at the front of tenant spaces exposing rafters in these areas on Buildings A, B & C;
 - New dormer with metal roof on Building C;
 - New entry roof gable with metal roof on Building C;
 - The roof areas at 6 corners would be removed exposing the fascia and joists and substituting a bronzed aluminum decorative panel;
 - New windows on Building C;
 - New rollup doors on Buildings B and A; and
 - New exterior paint colors, new wood vertical siding at walls and select columns. The proposed colors include tans, sage-like greens and blues. Select roof

elements would be upgraded to include a standing-seam steel material in a non-reflective silver tone. The project also includes replacement of portions of the existing landscaping with drought-tolerant landscaping.

Recommended to the: Planning Commission

Planner: Craig Spencer, Chief of Planning, HCD

OTHER MATTERS

1. Consider finding, pursuant to AB 361 and in order for the Historic Resources Review Board to continue meeting remotely, that the COVID-19 pandemic state of emergency declared by Governor Newsom is still in effect; the Historic Resources Review Board has reconsidered the circumstances of the state of emergency; and the Monterey County Health Officer continues to recommend social distancing measures for meetings of the legislative bodies.

HRRB COMMENTS

Members of the HRRB and/or staff may have comments on non-agenda items, which are within the purview of the Board. At this time, members may also request that an item be added to a future HRRB agenda.

ADJOURNMENT

For additional information, or if you are unable to attend the meeting, please contact Craig Spencer at (831) 755-5233. Should you have any questions regarding a specific project please contact the staff person or planner assigned to the project at (831) 755-4800.

NEXT MEETING

Date: March 3, 2022
Time: 11:30 a.m.
Location: Teleconference/Zoom

*Note: Digital Recordings of meeting minutes available at:
<https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/committees-hearings-agendas/historic-resource-review-board/agenda-minutes-and-audio-minutes-2022/-fsiteid-1#!/>

DOCUMENT DISTRIBUTION: Documents relating to agenda items that are distributed to the Board Members less than 72 hours prior to the meeting are available by request by sending an email to HernandezE7@co.monterey.ca.us. Documents distributed by County staff at the meeting of the Board Members will be available upon request by sending an email to HernandezE7@co.monterey.ca.us.

If requested, the agenda shall be made available in appropriate alternative formats to persons with a disability, as required by Section 202 of the Americans

with Disabilities Act of 1990 (42 USC Sec. 12132) and the federal rules and regulations adopted in implementation thereof. For information regarding how, to whom and when a person with a disability who requires a modification or accommodation in order to participate in the public meeting may make a request for disability-related modification or accommodation including auxiliary aids or services or if you have any questions about any of the items listed on this agenda, please call the Monterey County Housing and Community Development at (831) 755-5025.

MONTEREY COUNTY HISTORIC RESOURCES REVIEW BOARD

Thursday, January 6, 2022 11:30 a.m.
Monterey County Government Center
1441 Schilling Place, Salinas, CA 93901
Via Teleconference/Zoom

Minutes

CALL TO ORDER

Chair John Scourkes called the meeting to order at 11:32 a.m.

ROLL CALL

Present: John Scourkes, Michael Bilich, Salvador Munoz, Kellie Morgantini, Judy MacClelland, Belinda Taluban

Absent: Sheila Lee Prader

Staff: Phil Angelo (Secretary), Elizabeth Hernandez (Clerk)

Secretary, Phil Angelo, went over the Zoom meeting protocols.

APPROVAL OF MINUTES

1. Approval of the November 4, 2021 HRRB Meeting Minutes.

It was moved by Salvador Munoz and seconded by Kellie Morgantini to approve the HRRB Meeting Minutes for November 4, 2021.

RESULT: Passed (Unanimous)

MOVER: Salvador Munoz

SECONDER: Kellie Morgantini

AYES: Judy MacClelland, John Scourkes, Salvador Munoz, Michael Bilich, Kellie Morgantini, Belinda Taluban

ABSENT: Sheila Lee Prader

2. Approval of the December 2, 2021 HRRB Meeting Minutes.

It was moved by Salvador Munoz and seconded by Kellie Morgantini to accept the HRRB Meeting Minutes for December 2, 2021.

RESULT: Passed (Unanimous)

MOVER: Salvador Munoz

SECONDER: Kellie Morgantini

AYES: Judy MacClelland, John Scourkes, Salvador Munoz, Michael Bilich, Kellie Morgantini, Belinda Taluban

ABSENT: Sheila Lee Prader

3. Approval of the December 16, 2021 HRRB Meeting Minutes.

It was moved by Salvador Munoz and seconded by Judy MacClelland to approve the HRRB Meeting Minutes for December 16, 2021.

RESULT: Passed (Unanimous)

MOVER: Salvador Munoz
SECONDER: Judy MacClelland
AYES: Judy MacClelland, John Scourkes, Salvador Munoz, Michael Bilich, Kellie Morgantini, Belinda Taluban
ABSENT: Sheila Lee Prader

PUBLIC COMMENT

No Public Comment.

SCHEDULED ITEMS

None.

OTHER MATTERS

1. Consider finding, pursuant to AB 361 and in order for the Historical Advisory Committee to continue meeting remotely, that the COVID-19 pandemic state of emergency declared by Governor Newsom is still in effect; the Historical Advisory Committee has reconsidered the circumstances of the state of emergency; and the Monterey County Health Officer continues to recommend social distancing measures for meetings of the legislative bodies.

It was moved by Kellie Morgantini and seconded by Judy MacClelland to continue to approve to hold the meetings electronically due to the health and safety given the status of COVID-19.

RESULT: Passed (Unanimous)
MOVER: Kellie Morgantini
SECONDER: Judy MacClelland
AYES: Judy MacClelland, John Scourkes, Salvador Munoz, Michael Bilich, Kellie Morgantini, Belinda Taluban
ABSENT: Sheila Lee Prader

2. Review and finalize the CLG Report. The Board and Staff reviewed and discussed the draft report during the December 2, 2021 meeting. Final updated report will be submitted preceding the January 6, 2022 meeting.

It was moved by Kellie Morgantini and seconded by Salvador Munoz to approve and subject to updates incorporating additional training received by the Board members and addition of properties listed on the Monterey County Register of Historic Resources in the reporting period to Section III.C. of the report.

RESULT: Passed (Unanimous)
MOVER: Kellie Morgantini
SECONDER: Salvador Munoz
AYES: Judy MacClelland, John Scourkes, Salvador Munoz, Michael Bilich, Kellie Morgantini, Belinda Taluban
ABSENT: Sheila Lee Prader

3. Nomination of Officers.

Chair Scoukes nominated Salvador Munoz and Judy MacClelland to be on the committee for nomination of Officers.

4. Consider re-convening the Historic Resources Preservation Ordinance Update Sub Committee.

Chair Scourkes nominated Judy MacClelland, Kellie Morgantini, and himself to the committee.

HRRB COMMENTS

Kellie Morgantini mentioned she intends to attend the California Preservation seminars for 2022.

ADJOURNMENT

Meeting was adjourned by Chair Scourkes at 12:10 p.m.

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MONTEREY COUNTY

HOUSING AND COMMUNITY DEVELOPMENT

Erik Lundquist, AICP, Director



HOUSING, PLANNING, BUILDING, ENGINEERING, ENVIRONMENTAL SERVICES

1441 Schilling Place, South 2nd Floor
Salinas, California 93901-4527

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MEMORANDUM

Date: February 3, 2022

To: The Monterey County Historic Resources Review Board (HRRB)

From: Craig Spencer, Chief of Planning

Subject: Mid Valley Shopping Center (PLN190140).

cc: File No. PLN190140
Russ Stanley, Applicant
Anthony Lombardo, Applicant's representative
Pricilla Walton, Carmel Valley Association
Ed Stellingsma, Neighbor
Alli Wood, Neighbor

Recommendation

Staff recommends that the HRRB review the Draft Environmental Impact Report (EIR) prepared for the Mid Valley Shopping Center (**Attachment B**) together with a Design Approval application (PLN190140), requesting to allow exterior alterations to existing buildings at the Mid-Valley Shopping Center, and adopt a resolution making a recommendation to the Planning Commission. This recommendation will require a determination of the Mid Valley Shopping Center's historical significance. As such, there are two different courses of action as follows.

1. If the Center is found NOT eligible for listing as an historic resource, staff recommends that the HRRB recommend approval of the Design Approval to the Planning Commission.
2. If the Mid Valley Shopping center IS found eligible for listing as an historic resource, staff recommends that the HRRB:
 - a. Deny the request for consideration of a substantial financial hardship;
 - b. Recommend denial of the project as proposed; and
 - c. Recommend consideration of a project alternative (modified project) that would comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

A draft resolution denying the request for consideration of a substantial financial hardship and recommending denial of the project as proposed (Action 2), is attached for consideration (**Attachment A**). If Action 1 is taken rather than Action 2, a motion of intent to adopt the resolution finding that the Center is not eligible for listing may be made. Staff would schedule the resolution for consideration of the HRRB at its next meeting.

Background

The Carmel Valley Shopping Center, Mid-Valley Shopping Center, or Shopping Center is located west of Carmel Valley Road between Carmel Valley Road and Center Street. The shopping center is bordered on the west by Dorris Drive and on the east by Berwick Drive. The shopping center provides approximately 68,000 square feet of shops with a large central parking area. As shown on the project plans (**Attachment D**), and as described in the historic reports, the Shopping Center is comprised of 5 different buildings or blocks. Each building or “block” is identified in a letter system; Building A, anchored by Safeway, Building B, connected by a breezeway to Building A and containing multiple tenant spaces at the southeast corner of the property; Building C, formerly anchored by the cinema along the eastern side of the property; Building D, currently an Ace Hardware store; and Building E, and auto repair center.

In 2019, some work began at Mid Valley Shopping Center including the installing of Hardie Board and white paint on building C (the building that formerly contained a cinema). A stop work order was issued midway through the project and the applicant was directed to apply for a Design Approval or restore the site to its pre-existing condition. On May 8, 2019, the property owner, Russ Stanley representing Mid Valley Partners LLC (applicant), submitted a request for a Design Approval (PLN190140) to allow:

Facade upgrades and site improvements at the Mid Valley Shopping Center including:

- New paint around the window trims and roof fascia;
- Wrapping select aggregate concrete columns in a hardy board material that mimics rough-sawn siding;
- Removal of the “breezeway” or overhead roof element connecting Building A and Building C;
- Removal of portions of the roof at the front of tenant spaces exposing rafters in these areas on Buildings A, B & C to provide better visibility of the tenant spaces;
- Construction of a new dormer with metal roof on Building C;
- New entry roof gable with standing seam metal roof on Building C;
- The roof areas at 6 corners would be removed exposing the fascia and joists and substituting a bronzed aluminum decorative panel. The panels would be attached to the remaining joists and fascia;
- New windows on Building C;
- New rollup doors on Buildings B and A; and
- New exterior paint colors, new wood vertical siding at walls and select columns.

The proposed colors include tans, sage-like greens and blues. Select roof elements would be upgraded to include a standing-seam steel material in a non-reflective silver tone. The project also includes replacement of the portions of the existing landscaping with drought-tolerant landscaping.

As part of the review of that Design Approval, comments were submitted by the Carmel Valley Association (CVA) suggesting that the Mid Valley Shopping Center is an historic resource. In response, the applicant had Dr. Anthony Kirk prepare a Phase I historic assessment of the Shopping Center. Dr. Kirk submitted a letter dated September 18, 2019 finding that the Mid Valley Shopping center does not appear eligible for listing on the National, State, or Local registers. Several reasons were given for his conclusion.

The Carmel Valley Association (CVA) separately hired Page & Turnbull to conduct an assessment of the Mid Valley Shopping Center. Page & Turnbull provided a “Preliminary Opinion of Historic Significance” dated October 29, 2019. Page & Turnbull’s preliminary opinion was that the Mid Valley Shopping Center appears to possess sufficient significance and integrity to be eligible for listing in the California Register under Criterion 3, for its architectural style and association with architect Olof

Dahlstrand. Page & Turnbull later provided a Phase 1 Historic Assessment and Primary Records document using the Department of Parks and Recreation (DPR) forms.

Dr. Kirk provided a written rebuttal to the Page & Turnbull Preliminary Opinion dated November 4, 2019, in which he disagreed with the Page & Turnbull conclusion and provides additional details to support his earlier conclusion that the shopping center does not qualify for listing.

Later, the applicant commissioned another opinion from Dr. Laura Jones. Dr. Jones reviewed and summarized the previous reports and letters from Dr. Kirk and Page & Turnbull and provided her own analysis. Dr. Jones found no substantial evidence supporting a determination that the shopping center is eligible for listing as an historic resource and further found that even if it were considered eligible for listing, it lacks integrity and does not convey its original design (agreeing with and support the conclusions of Dr. Kirk).

Due to competing opinions on the matter, the County began the process of preparing an Environmental Impact Report (EIR). The California Environmental Quality Act (CEQA) Guidelines Section 15064(g) directs lead agencies to prepare an EIR (and treat impacts as significant) when there is disagreement among expert opinions that are substantiated by facts.

As part of the EIR preparation, another historian was contracted to perform a review and analysis of the Shopping Center, this time through contract with the County. Diana Painter was given all of the previous documentation and opinions and asked to form her own opinion on the matter. On December 21, 2020, Painter provided an Historic Resources Evaluation and Phase 1 Assessment; the conclusion, Mid Valley Shopping Center is eligible for listing for its design and association with Olof Dahlstrand and it retains integrity.

Ms. Painter also provided a preliminary analysis of the project's consistency with the Secretary of the Interior Standards for Rehabilitation. She found that the project, as proposed is not consistent with the standards. This conclusion has not been disputed (see discussion later).

All of the above referenced letters and reports were attached to the Draft EIR that was circulated for public comment from November 24, 2021 through January 10, 2022. The Draft EIR and all of the appendices can be found at <https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/current-major-projects/mid-valley-shopping-center-pln190140> and is attached as **Attachment B** to this report.

During the public comment period, the County received several comments on the Draft EIR. The comments are attached to this report as **Attachment C**. Comments submitted by the applicant's representative, Anthony Lombardo, contain attachments with additional information that are intended to justify a substantial financial hardship (see discussion below) and provide additional historic information from Dr. Kirk and another historian, Barbra Lamprecht. Ms. Lamprecht provides a review of the other letters and concludes that the shopping center is not significant and does not have integrity. Comment letters were also received by neighbors to the project along Center street. Their concerns are with the appearance and noise at the back of the building occupied by Safeway. The comments relate to the bushes and shrubs that had provided a buffer for those residences but have been removed. The applicant has expressed a willingness to provide for new fencing and/or vegetation to address this concern.

Project Overview and Review Approach

This project includes a Design Approval to allow exterior modifications at the Mid Carmel Valley Shopping Center. The proposed exterior alterations, according to the applicant, are intended to achieve the following objectives:

- Revitalize an otherwise stale and outdated center to assure its economic viability and growth;
- Provide a local job base, especially for local residents seeking employment;
- Bring an overall consistency to the design of the center while allowing for individual diversity and identification of businesses;
- Modernize and increase energy efficiency to reduce the carbon footprint of the shopping center;
- Attract new businesses and retain existing businesses that provide goods and services to local residents; and
- Provide a range of businesses that would allow local residents to shop and meet in one location rather than traveling to other properties thereby reducing traffic and related issues.

During review of the Design Approval, controversy surrounding shopping center's status as an historical resource has been the primary concern. This is the primary focus of this report.

The Planning Commission, and possibly the Board of Supervisors on appeal, will be tasked with considering the EIR and approving or denying the proposed Design Approval. The consideration of environmental impacts (in consideration of the EIR), together with the design review¹, will involve consideration of the historic significance of the Mid Valley Shopping Center. As such, the HRRB is asked to review and make a recommendation to the Planning Commission on this project.

Determining Historical Resource Significance or Eligibility for Listing

Qualified historians disagree on the historic significance of the Mid Valley Shopping Center. There is much that is consider in determining historic significance.

First, Section 15064.5(a) of the CEQA Guidelines states:

For purposes of this section, the term "historical resources" shall include the following:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California

¹ The purpose of [Design review] is to provide a district for the regulation of the location, size, configuration, materials, and colors of structures and fences, except agricultural fences, in those areas of the County of Monterey where the design review of structures is appropriate to assure protection of the public viewshed, neighborhood character, and to assure the visual integrity of certain developments without imposing undue restrictions on private property. (Chapter 21.44 MCC)

Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

In this case, the Mid Valley Shopping Center is not listed on any register (local, state, or federal) and there has been no determination of eligibility to date. It should be noted that the property owner does not believe the Mid Valley Shopping Center is an “historic resource” and does not consent to listing the property on any register at this time. Therefore, the determination on “historical significance” lies with the lead agency’s determination. Monterey County is the “lead agency” under CEQA in this case and our determination must be “supported by substantial evidence in the record.” Generally, a project that qualifies for listing, on the local, state, or national registers is treated as an “historical resource” under CEQA.

California Register:

Public Resources Code section 5020.1(j) contains the State’s definition of “Historical resource.”² Public Resources Code section 5024.1 establishes the California Register of Historical Resources and sets forth criteria and procedures for administration of the Register. The criterion for inclusion on the California Register pursuant to section 5024.1 align with the four criteria quoted in Section 15064.5 of the CEQA Guidelines (see quote above beginning on page 4). The only difference; the criteria are numbered 1 through 4 rather than lettered A through D.

National Register:

The preceding discussion outlines the CEQA definitions and California Register definitions of an “historical resource.” National Register criteria are similar to the California Register criteria but are interpreted at a broader (National) level. National Register Criteria include:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

² “Historical resource” includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.” (PRC Section 5020.1)

- B. *That are associated with the lives of persons significant in our past; or*
 - C. *That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
 - D. *That have yielded, or may be likely to yield, information important in prehistory or history.*
- (Code of Federal Regulations, Title 36, Part 60/National Register Bulletin 15)

The language between the State criterion and National Register criterion are very similar but have some notable and important differences. Criterion C, “the work of a master,” is the primary area where historians disagree. A master is “a figure of recognized greatness” in their field.

Local Register:

Criteria for listing on the Monterey County Register of Historic Resources can be found in Chapter 18.25 of the Monterey County Code. The criteria include:

An improvement, natural feature, or site may be designated an historical resource and any area within the County may be designated a historic district if such improvement, natural feature, site, or area meets the criteria for listing on the National Register of Historic Places, the California Register of Historic Resources, or one or more of the following conditions are found to exist:

A. *Historical and Cultural Significance.*

1. *The resource or district proposed for designation is particularly representative of a distinct historical period, type, style, region, or way of life.*
2. *The resource or district proposed for designation is, or contains, a type of building or buildings which was once common but is now rare.*
3. *The resource or district proposed for designation was connected with someone renowned.*
4. *The resource or district proposed for designation is connected with a business or use which was once common but is now rare.*
5. *The resource or district proposed for designation represents the work of a master builder, engineer, designer, artist, or.*
6. *The resource or district proposed for designation is the site of an important historic event or is associated with events that have made a meaningful contribution to the nation, State, or community.*
7. *The resource or district proposed for designation has a high potential of yielding information of archaeological interest.*

B. *Historic, Architectural, and Engineering Significance.*

1. *The resource or district proposed for designation exemplifies a particular architectural style or way of life important to the County.*
2. *The resource or district proposed for designation exemplifies the best remaining architectural type of a community.*
3. *The construction materials or engineering methods used in the resource or district proposed for designation embody elements of outstanding attention to architectural or engineering design, detail, material or craftsmanship.*

C. *Community and Geographic Setting.*

1. *The proposed resource materially benefits the historic character of the community.*
2. *The unique location or singular physical characteristic of the resource or district proposed for designation represents an established and familiar visual feature of the community, area, or county.*

3. *The district is a geographically definable area, urban or rural possessing a significant concentration or continuity of site, buildings, structures, or objects unified by past events, or aesthetically by plan or physical development.*
4. *The preservation of a resource or resources is essential to the integrity of the district.*
(Section 18.25.070 MCC)

The above-described criteria for listing at the local, state, and federal registers is the basis from which historians draw conclusions. There are many other factors and subcategories that are considered in reaching a conclusion. Many of those factors are described in the National Register Bulletin 14 (https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf). For instance, historic context must be evaluated, significance categories and criteria must be carefully considered, and integrity must be present. Housing & Community Development (HCD) staff will not attempt to describe or analyze these factors in detail. Instead, HCD staff has reviewed the opinions of five different historians and have attempted to summarize the relevant factors herein.

Points of Disagreement:

Five historians have reviewed the Mid Valley Shopping Center. Three of them have found that the property is not significant and/or lacks integrity and two of them found the property is historically significant and eligible for listing because of its design and association with Olof Dahlstrand, a “master architect” (Criteria C at the State level).

The main questions that must be decided by the County;

- Is the Shopping Center an Historic Resource?
 - Is Olof Dahlstrand a “master architect,” or “figure of recognized greatness”
 - Is the Mid Valley Shopping Center distinguishable from other works and representative of a particular phase in the development of Dahlstrand's career that is tied to the reasons he would qualify for distinction as a figure of recognized greatness?
- If the answer to both of those questions is yes, then, does the Mid Valley Shopping center retain integrity?

Olof Dahlstrand (1916-2014):

Olof Dahlstrand was born in Wisconsin. He earned his degree in architecture from Cornell University in 1939, and moved to the San Francisco Bay area in 1948 where he worked as an associate for Fred and Lois Langhorst. He took over the practice when the Langhorsts moved to Europe in 1950 and later worked for Skidmore, Owings & Merrill before establishing his own practice in the Monterey Bay area in the early 1960s. Dahlstrand's work was inspired by Frank Lloyd Wright and often contained strong horizontal and vertical elements of the Prairie style. Some of his notable projects include the Carmel Plaza Shopping Center, the Wells Fargo Building in Carmel, a few single-family residences in the “usonian” architectural style located in the Bay Area, renderings produced in collaboration with John Carl Warnecke, the UC Santa Cruz Faculty Housing, and more. Dahlstrand retired in 1984 but continued to be an active part of the Monterey Bay Community serving on the Carmel Planning Commission and participating in local art events.³ Some historians have pointed out that Dahlstrand has not been widely published has not received many of the accolades that are typical of a “master architect.” Others suggest that much of his greatness came from his ability to produce renderings which helped influence design.

³ Sources: 1: UC Berkely Environmental Design Archives; Dahlstrand, Olof; <https://archives.ced.berkeley.edu/collections/dahlstrand-olof/>;

2: AIA Presents “Olof Dahlstrand,” a Lecture by Pierluigi Serrano; <https://houseof8media.com/portfolio/aia-presents-olof-dahlstrand/>

Integrity:

According to the National Register Bulletin, *“Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance. Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.”*

The seven aspects of integrity are:

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

The integrity of the shopping center, or lack thereof, is discussed in several of the reports and letter’s prepared by individual historians. This has been a secondary issue to the question of does the shopping center qualify as an historic resource, as integrity is only evaluated if the project qualifies for listing in the first instance.

The two historians who found the Shopping Center eligible for listing provide 1966 to 1967/68 as the period of significance for the Shopping center. The shopping center remains in its original location but has undergone several changes in tenants and interior and exterior alterations overtime. Some of the buildings or blocks have been altered more than others. It is debated among historians if the alterations have significantly impacted the design, materials, feeling, and workmanship of the buildings and therefore impacted integrity of the center. Again, HCD staff will refer the HRRB and public to the documents produced by the historians and attached to the DEIR and comments thereon on this issue.

Secretary of the Interior Standards

Reports provided by historians have focused on the question of historic significance of the Shopping Center. Only Diana Painter with Painter Preservation has prepared an analysis of the proposed projects consistency with the Secretary of the Interior’s (SOI) for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer. In this case, standards for rehabilitating historic properties is the proper treatment. Painter found that the proposed project would not be consistent with the SOI standards as it is proposed. There is no known dispute or controversy over this determination. The dispute lies with question of significance that is the precursor to application of the SOI standards. In other words, the SOI standards are only relevant if the property is found to be an historic resource in the first place.

SOI defines rehabilitation as follows: *“Rehabilitation” is defined as “the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient*

*contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values."*⁴

Generally, projects that comply with the SOI standards do not have an adverse impact on historic properties and can be exempt from CEQA (Section 15331 of the CEQA Guidelines). The proposed project would remove the roof connecting buildings A and B, change fenestration by creating openings in the roof and adding roll-up doors, change the roof line by adding dormers with metal roofs, wrap the existing concrete columns with hardy board siding, and contain other improvements that would change or remove features of the Shopping Center that define the character of the original Dahlstrand design.

If the Shopping Center is found to be an historic resource, the project would have a potentially significant impact on that resource as it is currently designed because it has not been designed consistent with the SOI standards and would change the character defining features thus diminishing or destroying its historic character. If the Shopping Center is found not to be a significant resource, the SOI standards would be inapplicable.

County staff had prepared a Draft EIR for this project that has treated the property as an historic resource as required by Section 15064(g) of the CEQA Guidelines. Because the project would have a potentially significant impact on the thus far presumed historic resource, the project would have significant and unavoidable impacts on the environment. A project alternative has been included in the Draft EIR that includes a revised project proposal meeting the SOI standards. That alternative is conceptual at this point.

Substantial Financial Hardship

The applicant's representative, in commenting on the Draft EIR (See Attachment C, Letter from Anthony Lombardo dated January 10, 2022), contends that there would be a significant adverse economic impact if contemporary improvements to the Shopping Center are not allowed to proceed. To support this contention, a letter is attached to the comment prepared by Norman Hulberg of Valbridge Property Advisors, January 7, 2022. Mr. Hulberg provides his analysis of the impacts of a historic designation on the value of the Shopping Center. His analysis is that the Shopping center, and others like it (of its era), are in need of renovation or redevelopment to keep pace with changes in the market and to stay competitive. He finds that the consequences of an historic determination are that the shopping center will be unable to change with the times which will lead to:

- Decreasing occupancy rates
- Increase lag time in signing leases
- Decreasing rents
- Lowering of tenant credit strength
- Diminished desirability of the property as an investment
- Loss of customers to competitors; and
- Decreased ability to obtain loans for purchase or renovation.

The analysis finds that the shopping center has a current value of slightly over \$10 million dollars, that it is necessary to spend about \$1 million in renovations, and the adjusted current (unconstrained) value without the historic label and factoring in renovation costs, is slightly over \$9 million. Due to the factors listed above along with other information contained in the report, Mr. Hulberg suggests that the property would be worth just under \$6 million if it were considered historic and that the value would drop year after year by a factor of 10% until it would collapse from an economic point of view from decreased value, increased vacancies, and decreased rents.

⁴ National Parks Service, Secretary of the Interior Standards for Rehabilitation
<https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>

Staff has reviewed the letter and information and has reservations about the conclusion contained in the report. There are many examples in the State and nation of successful historic shopping centers and districts and many of them are destinations unto themselves because of the historic nature. None-the-less, staff has reviewed the information according to the criteria contained in Section 18.25.175 of the Monterey County Code. This section allows the HRRB to approve or conditionally approve a permit even though it does not meet the criteria contained in Chapter 18.25, provided that the applicant *“...presents facts and clear evidence demonstrating to the Review Board that failure to approve the application for a permit will cause an immediate and substantial financial hardship because of conditions peculiar to the particular structure or other feature involved, and the damage to the owner of the property is unreasonable in comparison to the benefit conferred to the community...”*

The request and information submitted by the applicant for a substantial financial hardship does not appear to meet the criteria established in Section 18.25.175 primarily because no information has been provided to demonstrate or substantiate that the Shopping Center cannot be remodeled or rehabilitated in a manner which would meet the SOI standards and allow a reasonable use of or return from the property to the property owner (18.25.175.C) and there has been no investigation into options for relief from economic hardship (18.25.175.D). It has not been determined with any certainty to this point that the Shopping Center could not be renovated or rehabilitated within the SOI standards. For this reason, staff recommends that the HRRB deny the request for consideration of a substantial financial hardship or provide more direction to the applicant and staff.

All of the discussion on the financial hardship is only relevant if the Shopping Center is considered historic by the HRRB.

Recommendation

Three historians, all commissioned by the applicant (Kirk, Jones, and Lamprecht), have found that the Shopping Center does not meet the criteria to be considered an historic resource pursuant to CEQA. Two historians, one commissioned by the Carmel Valley Association (CVA) (Kozakavich with Page & Turnbull), and one acting as a subcontractor to the County’s EIR consultant (Painter) have found the project qualifies as an historic resource pursuant to CEQA.

HCD Planning staff has followed the CEQA process, prepared a Draft EIR for the project, reviewed all of the reports and information, and has attempted to distill the relevant information in this report. The Planning Commission and/or Board of Supervisors will ultimately be asked to consider the EIR and the Design Approval. Consideration of the historic significance of the Shopping Center will be central to this consideration. The Historic Resource Review Board (HRRB) is asked to review the Draft EIR along with comments submitted on the EIR and make a recommendation on the Design Approval to the Planning Commission. The HRRB recommendation will be provided to the Planning Commission and/or Board of Supervisors and may form the basis for staff’s future recommendation on this matter.

The following attachments are on file with HCD:

- Attachment A - Draft Resolution
- Attachment B - Draft Environmental Impact Report (DEIR) with Appendices:
<https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/current-major-projects/mid-valley-shopping-center-pln190140>
- Attachment C - Comments received on the DEIR
- Attachment D - Project Plans and application

Attachment A

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DRAFT RESOLUTION

*Before the Historic Resources Review Board in and for
the County of Monterey, State of California*

Resolution No.: _____ (Mid-Valley
Shopping Center)

Resolution of the Monterey County
Historic Resources Review Board (HRRB)

to:

- 1) Certify that the Draft Environmental Impact Report prepared for the Mid-Valley Shopping Center Design Approval (SCH#2020090480) along with comments received during the comment period have been considered;
- 2) Recommend that the Mid-Valley Shopping Center qualifies for listing on the Monterey County Register of Historic Resources under criteria A.5 for its design by Olof Dahlstrand and therefore should be considered an historic resources;
- 3) Recommend that the project does not qualify for a substantial financial hardship pursuant to Section 18.25.175 of the Monterey County Code;
- 4) Recommend denial of the Design Approval (PLN190140) to allow modifications to the exterior of the Mid-Valley Shopping Center as it is currently proposed; and
- 5) Recommend consideration of modifications to the project that comply with the Secretary of the Interior Standards for the Rehabilitation of Historic Properties (Alternative 2 of the Draft EIR) or that the property be restored to its pre-violation state.

WHEREAS, this matter was heard by the Historic Resources Review Board (HRRB) on February 3, 2022, pursuant to authority provided in Chapter 2.56 of the Monterey County Code; and

WHEREAS, on May 8, 2019, Mid Valley Partners LLC filed an application for a Design Approval (File No. PLN190140) to allow exterior modifications to the Mid-Valley Shopping Center located at 9550 Carmel Valley Road, Carmel (Assessor's Parcel Number: 169-234-007-000). The proposed modifications include after-the fact permitting of a wrapping concrete columns with hardy board and painting on a portion of building C and would allow the following improvements:

- New paint around the window trims and roof fascia;
- Wrapping select aggregate concrete columns in a hardy board material that mimics rough-sawn siding;

- Removal of the “breezeway” or overhead roof element connecting Building A and Building C;
- Removal of portions of the roof at the front of tenant spaces exposing rafters in these areas on Buildings A, B & C to provide better visibility of the tenant spaces;
- Construction of a new dormer with metal roof on Building C;
- New entry roof gable with standing seam metal roof on Building C;
- The roof areas at 6 corners would be removed exposing the fascia and joists and substituting a bronzed aluminum decorative panel. The panels would be attached to the remaining joists and fascia;
- New windows on Building C;
- New rollup doors on Buildings B and A; and
- New exterior paint colors, new wood vertical siding at walls and select columns.

The proposed colors include tans, sage-like greens and blues. Select roof elements would be upgraded to include a standing-seam steel material in a non-reflective silver tone. The project also includes replacement of the portions of the existing landscaping with drought-tolerant landscaping; and

WHEREAS, during review of the Design Approval comments were received indicating that the Mid-Valley Shopping Center may be historic. In response, the applicant commissioned Dr. Anthony Kirk to prepare an historic assessment of the Shopping Center. Dr. Kirk submitted a letter dated September 18, 2019, finding that the Mid Valley Shopping center does not appear eligible for listing on the National, State, or Local registers; and

WHEREAS, the Carmel Valley Association (CVA) separately hired Page & Turnbull to conduct an assessment of the Mid Valley Shopping Center. Page & Turnbull provided a “Preliminary Opinion of Historic Significance” dated October 29, 2019. Page & Turnbull’s preliminary opinion was that the Mid Valley Shopping Center appears to possess sufficient significance and integrity to be eligible for listing in the California Register under Criterion 3, for its architectural style and association with architect Olof Dahlstrand. Page & Turnbull later provided a Phase 1 Historic Assessment and Primary Records document using the Department of Parks and Recreation (DPR) forms; and

WHEREAS, Dr. Kirk provided a written rebuttal to the Page & Turnbull Preliminary Opinion dated November 4, 2019, in which he disagreed with the Page & Turnbull conclusion and provides additional details to support his earlier conclusion that the shopping center does not qualify for listing. Additionally, the applicant commissioned Dr. Laura Jones to provide another historic assessment of the property. Dr. Jones found no substantial evidence supporting a determination that the shopping center is eligible for listing as an historic resource and further found that even if it were considered eligible for listing, it lacks integrity and does not convey its original design (agreeing with and support the conclusions of Dr. Kirk); and

WHEREAS, due to competing expert opinions on the historic significance of the Mid-Valley Shopping Center, the County initiated preparation of an Environmental Impact Report (EIR). A Draft EIR was prepared and circulated for public comment from November 24, 2021, through January 10, 2022 (SCH#2020090480); and

WHEREAS, Diana Painter with Painter preservation conducted an historic assessment of the Mid Valley Shopping Center under contract with the County’s EIR consultant. Painter concluded in her letter dated December 21, 2020, that the Mid Valley

Shopping Center is significant for its design and association with Olof Dahlstrand and it retains integrity; and

WHEREAS, Diana Painter with Painter preservation prepared a review of the proposed project for compliance with the Secretary of the Interior Standards for the treatment of Historic Properties dated January 12, 2021. In her report, Painter concludes that the project as currently proposed, does not conform with the Secretary of the Interior Standards; and

WHEREAS, during the public comment period, comments were received from Alli Wood, Ed Stellingsma, Pricilla Walton on behalf of the Carmel Valley Association, and Anthony Lombardo on behalf of the applicant. These comments are attached to the Staff report prepared for the HRRB hearing on February 3, 2022 as Attachment C; and

WHEREAS, comments submitted on the Draft EIR by Anthony Lombardo on behalf of the applicant contend that there would be a significant adverse economic impact if contemporary improvements to the Shopping Center are not allowed to proceed. To support this contention, a letter is attached to the comment prepared by Norman Hulberg of Valbridge Property Advisors, January 7, 2022; and

WHEREAS, the HRRB has considered the financial information provided by Mr. Lombardo and Mr. Hulberg pursuant to the criteria contained in Section 18.25.175 of the Monterey County Code (Substantial Financial Hardship); and

WHEREAS, comments submitted on the Draft EIR by Anthony Lombardo on behalf of the applicant contain attachments that include additional responses from Dr. Anthony Kirk dated January 3, 2020, and another historic evaluation from Barbara Lamprecht from Modern Resources dated April 2021. In her report, Lamprecht evaluates the previous reports and analysis and concludes that the Mid-Valley Shopping Center is not eligible for listing as an historic resource; and

WHEREAS, the HRRB has reviewed and considered the Draft EIR inclusive of the historic assessments, other appendices, and all of the comments received during the comment period prior to forwarding this recommendation; and

WHEREAS, the HRRB adopts the following findings and evidence in forwarding this recommendation:

WHEREAS, the HRRB has considered information submitted by the applicant on the economic impacts of the decision/recommendation to treat the property as an historic resource and finds that. No information has been provided to demonstrate or substantiate that the Shopping Center cannot be remodeled or rehabilitated in a manner which would meet the Secretary of the Interior's standards allowing for a reasonable use of or return from the property to the property owner (18.25.175.C). In addition, there has been no investigation into options for relief from economic hardship (18.25.175.D); and

WHEREAS, the HRRB, in finding the Mid-Valley Shopping Center is an historic resource, has reviewed the project plans and application for consistency with the Secretary of the Interior's Standards for the Rehabilitation of Historic Resources and finds that the project would adversely impact the character defining features of the property

- Finding: The Historic Resources Review Board has reviewed the Draft Environmental Impact Report and comments received thereon.
- Finding: The Mid-Valley Shopping Center is eligible for listing on the Monterey County Register of Historic Resources under criteria A.5 (18.25.070.A.5) due to its design by Olof Dahlstrand, a figure of recognized greatness in the field of architecture and architectural renderings.
- Finding: In finding the project qualifies for listing on the Monterey County Register of Historic Resource, the Shopping Center should be treated as an historic resource pursuant to CEQA.
- Finding: The application, as proposed, is inconsistent with the applicable Secretary of the Interior's Standards for the Treatment of Historic Properties (Rehabilitation) and the criteria contained in Section 18.25.170 of the Monterey County Code and as such, would have a substantial adverse impact on the historic resource.
- Finding: The applicant has not demonstrated to the satisfaction of the Historic Resources Review Board that this project would qualify for a substantial financial hardship pursuant to the criteria established in Section 18.25.175 of the Monterey County Code primarily because no information has been provided to demonstrate or substantiate that the Shopping Center cannot be remodeled or rehabilitated in a manner which would meet the SOI standards and allow a reasonable use of or return from the property to the property owner (18.25.175.C) and there has been no investigation into options for relief from economic hardship (18.25.175.D).
- Evidence:
1. Design Approval application and supporting materials submitted by Mid Valley Partner's LCC contained in File No. PLN190140.
 2. The Draft Environmental Impact Report Prepared for the Mid-Valley Shopping Center (SCH#2020090408) including appendices.
 3. Comments received on the Draft Environmental Impact Report.
 4. The General Plan Historic Preservation Goals and Policies
 5. The Secretary of the Interior's Standards for the Treatment of Historic Properties
 6. Chapter 18.25 of the Monterey County Code
 7. National Register Bulletin 15
 8. California Public Resources Code Sections 5020.1(j) (State's definition of "Historical resource) and 5024.1 California Historic Register criteria.
 9. UC Berkely Environmental Design Archives.

NOW, THEREFORE, BE IT RESOLVED THAT, it is the decision of the Monterey County Historic Resources Review Board to:

- 1) Certify that the Draft Environmental Impact Report prepared for the Mid-Valley Shopping Center Design Approval (SCH#2020090480) along with comments received during the comment period have been considered;
- 2) Recommend that the Mid-Valley Shopping Center qualifies for listing on the Monterey County Register of Historic Resources under criteria A.5 for its design by Olof Dahlstrand and therefore should be considered an historic resources;
- 3) Recommend that the project does not qualify for a substantial financial hardship pursuant to Section 18.25.175 of the Monterey County Code;
- 4) Recommend denial of the Design Approval (PLN190140) to allow modifications to the exterior of the Mid-Valley Shopping Center as it is currently proposed; and
- 5) Recommend consideration of modifications to the project that comply with the Secretary of the Interior Standards for the Rehabilitation of Historic Properties (Alternative 2 of the Draft EIR) or require the property to be restored to its pre-violation state.

PASSED AND ADOPTED this 3rd day of February 2022, upon motion of _____, seconded by _____, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Attest

Phil Angelo, Secretary

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Attachment B

The attachment can be found at the link below:

<https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/current-major-projects/mid-valley-shopping-center-pln190140>

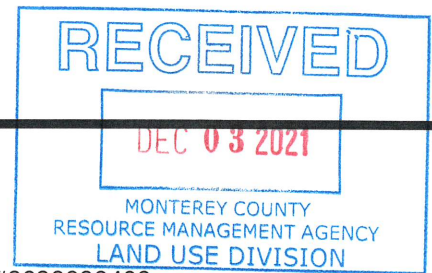
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Attachment C

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Friedrich, Michele x5189

From: Alli Wood <oficinouno@gmail.com>
Sent: Friday, December 3, 2021 1:28 PM
To: ceqacomments
Subject: MID VALLEY SHOPPING CENTER PLN190140 SCH#2020090480



[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Hello

I'm commenting on the environmental impact report for the Mid Valley Shopping Center

I live on 9500 Center St, Carmel-By-The-Sea, CA 93923, directly behind the Safeway. When I purchased my home there was a large wall with ivy blocking the view of the Mid Valley Shopping Center. It not only reduced noise from the delivery trucks, it also served as a barrier to the mess they leave at the back of the store daily. I was quite unaware until they tore it down only months after moving into my condo and now we have trucks delivering at all hours of the night and the bushes do not deter people from walking through and leaving garbage. From my window I can see the pallets, shopping carts, garbage that never goes completely away.

During the meeting held at St.Philips we discussed a fence and the owners agreed to look into plans for an attractive fence. We have not heard or seen any such updates.

The proposal states they will remove the existing landscaping and replace it with drought tolerant landscaping. The other residents of the condominiums agree that we need a wall/fence instead of small plants.

Thank you!
Alli Wood

831. 241.4548

Friedrich, Michele x5189

From: Sandra Schachter <schactersj@comcast.net>
Sent: Tuesday, December 14, 2021 9:30 AM
To: ceqacommments
Cc: Lundquist, Erik; 100-District 5 (831) 647-7755; Hardgrave, Sarah x7876; Eleanor Avila; Paola Berthoin; C.S. Noel; carmelvalleyassociation@gmail.com; Luana Conley; Rich Fox; Gawain, Marianne; Heyl, John; Janet Brennan; Kimes, Michael; Rick Manning; Marlene Martin; Mibs McCarthy; Robertson, Janice; Eric Sand; eric sand; Bob Siegfried; Dick Stott; Strasser Kauffman, Karin; Sudol, Andy; Priscilla Walton; Wiltsee, Lamont; jeff wood07
Subject: CVA comments on Mid-Valley shopping center DEIR
Attachments: midvalley letter 12-21.docx

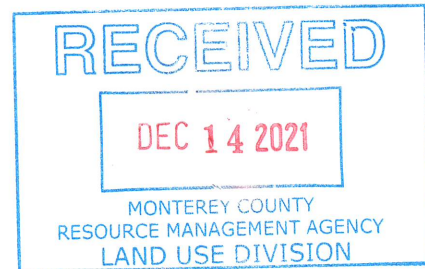
[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Attention: Craig Spencer

Dear Mr. Spencer

Attached are comments from Priscilla Walton, president of the Carmel Valley Association, in regard to the recent DEIR for the Carmel Valley Mid-Valley Shopping Center. Thank you for your consideration of our views.

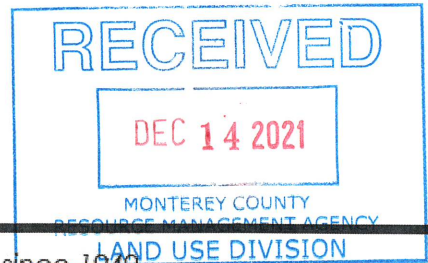
Sandra Schachter, Secretary, CVA





Carmel Valley Association

preserving the beauty, resources, and rural character of the Valley since 1949



**Comment on the Draft Environmental Impact Report (DEIR)
for the Mid-Valley Shopping Center Project
(PLN190140, SCH#2020090480)**

The Carmel Valley Association has reviewed the DEIR for the proposed project and has the following comments:

The DEIR finds the project would result in a significant and unavoidable impact:

“Therefore, approval of the project as proposed would result in a significant and unavoidable impact on an historical resource. The alternatives presented in this EIR will be considered by the County Planning Commission, or Board of Supervisors on appeal, in order to consider how to mitigate, if possible, the significant and unavoidable impacts of the proposed project.” (DEIR, p. 5-19)

The DEIR finds that Alternative 2: Design Modifications to Proposed Exterior Alterations in Compliance with the Secretary of the Interior’s Standards would not result in significant impacts on historical resources and would mitigate project impacts:

“Implementation of the design modifications above would ensure the proposed project would be consistent with the Secretary of the Interior’s Standards and would not result in significant impacts associated with historical resources. Submittal of revised plans reflecting these modifications will require review and approval by a qualified architectural historian selected by the County to ensure consistency with the Secretary of the Interior’s Standards.” (DEIR, p. 10-8)

When mitigation measures or alternatives are identified to reduce impacts to less than significant, CEQA requires their adoption. A fundamental mandate of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project” (PRC Sections 21002, 21081).

The DEIR affirms that the property is eligible for listing on Federal, California and Monterey County historic registers (DEIR, p. 5-16). The significant elements of the

MAIL P.O. Box 157, Carmel Valley, CA 93924

WEB www.carmelvalleyassociation.org | EMAIL president@carmelvalleyassociation.org

Mid-Valley Shopping Center's architecture are well documented, and its architect, Olof Dahlstrand, is acknowledged as a master with his body of work described in the appendix to the DEIR, Painter Preservation's Historic Resource Evaluation.

The DEIR's Alternative 2 meets project objectives by offering a framework for the developer to make repairs and improvements to the Mid-Valley Shopping Center while respecting its key architectural elements. By following this framework, new modifications to the property would avert environmental impacts, offensive alterations already made by the developer would be removed, and the changes would be consistent with the Secretary of the Interior's standards for historic resources.

The DEIR finds the project inconsistent with the following policies in the 2010 Monterey County General Plan: PS 12-12; PS 12-13 and PS 12-17. It also finds the project inconsistent with the Carmel Valley Master Plan Policy CV-3.13 and potentially inconsistent with Chapter 18.25 of the Monterey County Historic Preservation Ordinance. The DEIR should be revised to find that the project would have a significant impact on the environment, based on these findings.

Respectfully submitted,

Priscilla Walton, President
Carmel Valley Association
P.O. Box 157
Carmel Valley, CA 93924

Dated: December 14, 2021

Friedrich, Michele x5189

From: ed93940@aol.com
Sent: Wednesday, January 5, 2022 10:53 AM
To: Spencer, Craig x5233; ceqacomments
Cc: mvghoa@yahoo.com; gbyrne26@gmail.com; bpniak@redshift.com
Subject: Draft DEIR - Mid Valley Shopping Center
Attachments: Mid Valley Shopping Ctr - DEIR Input.pdf; Back side of Safeway at Mid Valley Shopping Center - December 2021.jpg; Back side of Safeway at Mid Valley Shopping Center - Sept. 2018.jpg; Landscape barrier behind Safeway prior to removal by Stanley Group.jpg

[CAUTION: This email originated from outside of the County. Do not click links or open attachments unless you recognize the sender and know the content is safe.]

Dear Mr. Spencer,

By way of a follow up to our telephone conversation of Jan. 4, 2022, I have enclosed the written response to the Draft DEIR for subject project. Please confirm receipt of the attached letter to you and its attachments.

Sincerely yours,

Ed J. Stellingsma, President Mid Valley Garden Homeowners Association





MID VALLEY GARDEN HOMEOWNER'S ASSOCIATION

Mr. Craig Spencer
Monterey County, Housing & Community Development
1441 Schilling Pl South, 2nd Floor - Salinas, CA 93901

January 4, 2022

**RE: Draft Environmental Impact Report (DEIR) - Mid Valley Shopping Center
9550 Carmel Valley Road, Carmel, CA 93923**

Dear Mr. Spencer:

As President of the Mid Valley Garden Home Owners Association (MVGHOA) I am writing on behalf of all the owners and residents at 9500 Center Street. Our complex, consisting of 20 two-story buildings face the entire block at the back-side of the Mid Valley Shopping Center.

We are excited and support the proposed improvements to the Shopping Center, however, significant visual/aesthetic, noise and delivery-truck traffic issues at the back of the Shopping Center must be addressed and mitigated. **Any approval for improvements must include an effective and attractive visual/sound barrier at the back of the Shopping Center.**

Such a fence/barrier was made a requirement by the Carmel Valley Land Use Committee during their hearing of July 15, 2019 and subsequent public hearings and was also agreed to by the current owner of the Shopping Center, Mr. Russel Stanley in his "Open Letter to the Community of July 26, 2019 (See attached).

I have enclosed the following documents related the blight and noise issues which surfaced after the removal of the previous landscape barrier after the Stanley Group's purchase of the Shopping Center:

- Email dated Sept. 14, 2018 to the Stanley Group's Mid Valley Shopping Center Manager.
- Letter dated November 15, 2018 to Mr. Russell Stanley.
- Ed Stellingsma's Presentation to the Carmel Valley Land Use Committee of July 15, 2019
- Open Letter to the Community dated July 26, 2019 by Mr. Russell W. Stanley.
- Letter to Mr. Brandon Swanson, Planning Services Mgr of Monterey Cty dated October 5, 2020.
- Photograph of visual blight behind the Safeway Store, December 2021.
- Photograph of the visual blight behind the Safeway Store Sept. 2018.
- Photograph of the landscape barrier behind Safeway prior to its removal by the Stanley Group.

Please feel free to contact me if you need any additional information.

Sincerely,

Ed J. Stellingsma, President MVGHOA



From: ed93940 <ed93940@aol.com>

To: wsterling <wsterling@sterlingmonterey.com>; tkurtz <tkurtz@sterlingmonterey.com>

Cc: MVGHOA <MVGHOA@yahoo.com>

Subject: Mid Valley Shopping Center - Meeting

Date: Fri, Sep 14, 2018 1:18 pm

Attachments: 9500 Center St - 1 Back side of Shopping Ctr.JPG (219K), 9500 Center St - 2 Removal of landscape buffer.JPG (205K), 9500 Center St - 3 Back side of Safeway.JPG (1133K)

Hello Trevor and Bill,

It was good to meet with you to address the recently exposed blight and noise increase at the back side of the shopping center after the removal of all the shrubs/landscape buffer. Needless to say, the shrubs provided a very efficient sight and noise buffer.

The residents at the condo complex at 9500 Center St across the back side of the shopping center are in a state of shock now that they have been exposed to a substantial increase in noise on account of refrigeration trucks' deliveries to the Safeway loading dock, loading and unloading activities, truck traffic, coffee grinding activities, etc. etc. and the visual blight of dumpsters, trash, pallets, on-site storage, trucks, etc.

I have enclosed three photographs, one was taken from the back side of the shopping center before the removal of the landscape buffer, one during the removal and one after.

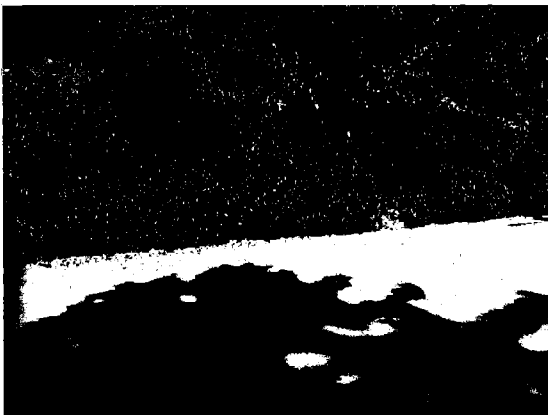
We shall look forward to a speedy resolution to this unfortunate decision that was made at the expense of the people in the neighborhood that have been loyal customers to the businesses at the Mid Valley Shopping Center. We also feel that this sudden exposure, after the removal of the landscaping that took many years to grow to the density and height, has reduced the property values of our condo complex.

I shall look forward to hearing about what resolutions will be initiated to alleviate the problems noted above.

Regards,

Ed J. Stellingsma, President - Mid Valley Garden Home Owners Association

3 Attached Images





MID VALLEY GARDEN HOMEOWNER'S ASSOCIATION

November 15, 2018

Mr. Russell Stanley
The Stanley Group
18840 Los Gatos/Saratoga Rd, Suite #A
Los Gatos, Calif. 95030

Re: Mid Valley Shopping Center, Carmel, CA.

Dear Mr. Stanley:

As President of the Mid Valley Garden Home Owners Association, I am writing this letter on behalf of the owners and residents of the neighborhood behind the Mid Valley Shopping Center. It is my understanding that you are the recent owner of the Shopping Center.

It is with dismay that we have witnessed the removal of all of the shrubs which, until last August, formed a very effective landscape barrier between the Shopping Center and its residents living in the neighborhood behind the Shopping Center. This landscape barrier took many years to grow to its density and height; it provided a very efficient sight and noise buffer (See enclosed "Before" photo).

The removal of the landscape "buffer" left us exposed to dumpsters, piles of trash, stacks of pallets, on-site storage, bales for recycling, truck traffic, excessive noise from refrigeration truck deliveries to the Safeway loading dock in back of the store and trash being blown across the street onto our landscaped gardens (See enclosed "After" photo).

After a meeting on September 13, '18 with two members of Sterling Property Management, we were led to believe that a solution would be forthcoming (See enclosed email dated Sept. 24, '18). Unfortunately, we are now being told that a resolution "is out of their hands".

The back side of this Shopping Center has become a neighborhood "nuisance" affecting the property values of our residences in violation of Para. 7 of the neighborhood's "Declaration of Conditions and Restrictions "Berwick Manor" which also govern the Shopping Center.

The people living in the neighborhood have been loyal customers to the businesses at the Mid Valley Shopping Center. We deserve an acceptable resolution to alleviate the problems noted above. We would appreciate an on-site meeting with you. I shall look forward to hear from you at (831) 626-1300 or our on-site manager Mr. Richard Helsten (831) 624-1912.

Sincerely,

Ed J. Stellingma, President Mid Valley Garden Home Owners Association

Copy of President Ed Stellingsma's presentation to the Carmel Valley Land Use Committee Hearing of July 15, '19 regarding proposed "improvements" by current owner to the Mid Valley Shopping Center. Among other recommendations, the Committee voted that the back-side of the Center be screened.

Good evening,

My name is Ed Stellingsma, I am the President of the Mid Valley Garden Home Owners Association representing 64 condominiums located on Center Street, directly behind the **Mid Valley Shopping Center**. A number of owners and residents have joined me here as well.

I appreciate the opportunity to provide feedback on tonight's proposal before you by **Mid Valley Partners LLC**.

Naturally, we are excited about any effort to improve our neighborhood Shopping Center **BUT** any approval for improvements should include a visual and sound barrier at the back of the Shopping Center.

Last August, shortly after the sale of the Shopping Center to the current owners, **we witnessed with dismay the removal of all the bushes and a number of major trees on the backside of the Shopping Center**. We were told by the Center's management company that the work was done on account of a rodent problem.

Actually the problem was created by stacking food waste on the ground each time the dumpster was full. This practice caused the rodent problem, not the bushes that had grown approx. 20 ft tall that formed a **very effective visual and sound barrier between the back-side to the Shopping Center and our condominium complex**.

I have some photographs that show the bushes **before** the massive removal, **during the work** and the **after**, exposing dumpsters, trash, stacks of pallets, bales of recycle cardboard, delivery trucks, etc.

The backside of the shopping center looks like an **industrial zone** facing our complex.

We have tried to address the problem with the Owner's representative but our request has fallen on deaf ears. That's why we are here to make sure that the visual and sound problems that plague our residential community are addressed with some visually attractive fence design solution incorporated with the request for improvements before you today.

Thank you.



The Stanley Group, Inc.

July 26, 2019

Open letter to the Community

Re: Mid Valley Shopping Center

As the new owner of the Mid Valley Shopping Center (we purchased the property a little over a year ago) it is and remains our intention to enhance the shopping center with a "soft modernization" of the exterior while retaining the rustic nature so prevalent in Carmel Valley. This would include creating many social areas where local residents and customers alike could mix to enjoy the atmosphere and catch up with their neighbors, allow young families to spend time outside the house in a fun, safe environment and create more harmony by providing social functions for the community. Our plans include the creation of a small park area for community events, water reduction through drought tolerant plants of up to 75% of current water usage, exterior paint, noise reduction fencing in the rear of the property and many other enhancements to the Shopping Center.

It is extremely important to us to respect the character of Carmel Valley. We are long term holders of property and look forward to many, many years of enjoyment with this Shopping Center through our enhancement of its beauty and character as well as our interaction with our tenants and the community. We have many positive community events in mind which we believe residents such as yourselves will appreciate.

To clarify our intent as it has been vastly distorted in the recent press, we are not planning any increase in building size or square footage. We do not intend to create a tourist destination with the center, but do believe our tenants need and desire to attract more business whether it be local or part of the tourists visiting Carmel Valley to enjoy its weather, restaurants, shops, and other features and benefits.

I'm hopeful the community values not just the auto repair business, but all our tenants, and if so, we need your support to keep them in business. Just during our recent ownership, we have lost a number of our tenants. The Mid Valley Center is old, tired and in need of substantial refurbishment in order to sustain our current tenants and attract new tenants. Like most small businesses today, many are struggling, and we need to find a way to drive additional foot traffic to the center.

With specific regard to some within the community who insist the auto repair shop remain, we have made a decision to rescind our application for the wine tasting room at the Auto Repair location and have agreed to a one year extension subject to their

agreement to reimburse us for normal operational costs of the center (as do all the other tenant's).

As environmentally conscious owners, we struggle with the idea having a tenant with solvents, gas, oil, radiator fluids and other hazardous chemicals just a few feet from the water table of the Carmel River. This causes us great concern, considerable anxiety and creates the potential for tremendous future liability for any hazardous release of toxics into the environment. We do not feel comfortable with such liability on a long-term basis.

We want the center to remain a local, neighborhood center and do not intend to change its character or integrity. A "soft rustic modernization" will go a long way toward bringing the center back to its luster and will provide residents with many more quality options nearby their homes rather than forcing them to drive a considerable distance for their daily needs. We intend to maintain the service nature of the center and will look to attract local tenants who fulfill basic necessities while also bringing a sense of today's needs into play.

Times change and businesses must evolve. When the center was first constructed there was a large movie theater built as part of the center, economics, demographics and time forced it out decades ago and the center was subsequently modified, storefronts changed, roofs adjusted, colors changed to reflect and attract other retail uses active at that time.

Likewise, with the advent of modern times, Amazon and the changing face of retail, changes in demographics and purchasing habits the center must change and evolve. It needs to be more service oriented and have more dining and social options. To remain the same will only result in the continued deterioration of the Shopping Center, loss of tenants and its eventual failure.

We intend to create a small park in the center for the benefit of local residents to sit and enjoy a sandwich, coffee or social hour with their neighbor, a place for young parents to spend time with the children while getting a break from parenting duties (if only for a few minutes). Many social events will be planned such as yoga on the grass, Easter egg hunts, outdoor BBQ, movie nights, etc. all again for the benefit of local residents.

Our goal is to bring back a strong sense of local community by creating and enhancing the Shopping Center to allow for greater social interaction between neighbors. Many residents live in somewhat remote areas or have large lots and do not have the benefit of daily interaction with their neighbors. We envision our center becoming a gathering place for those who desire more social interaction with their community.

We are planning a workshop on the evening of August 6th from 6:00-8:00pm which will allow us to present our ideas to the community and seek input and suggestions. I hope you will attend the workshop and if you are unable, I am happy to personally meet with anyone to discuss the property and our plans.

Everyone may have their own opinion as to our plans, but we have the best of intentions toward the local community and will continue to work toward proving ourselves with our future plans. I think when the dust settles the community will enjoy our plans and ideas, new social areas and appreciate the increased community interaction.

Sincerely,
Russel W. Stanley

A handwritten signature in black ink, appearing to read 'RS', written in a cursive style.

President
The Stanley Group, Inc.

From: ed93940@aol.com,

To: swansonb@co.monterey.ca.us,

Cc: mvghoa@yahoo.com, suzanne.zadeh966@gmail.com, kdklarich@sbcglobal.net, enos3@sbcglobal.net, bpniak@redshift.com, 24kdanz@gmail.com, gbyrne26@gmail.com,

Subject: Mid-Valley Shopping Center (PLN190140)

Date: Mon, Oct 5, 2020 4:05 pm

Attachments:

Dear Mr. Swanson:

In reference to subject Draft Environmental Impact Report, I am writing on behalf of all the residents/owners of the Mid Valley Garden HOA, located along the entire block of Center Street, directly behind the Mid Valley Shopping Center.

We have attended the Dec. 2, 2019 and July 15, 2019 CV Land Use Advisory Committee meetings and were assured that an attractively designed fence on the back side of the shopping center would be included in any design effort/approval of improvements at the Shopping Center.

The photos below illustrate the visual and sound blight that was created behind the shopping center after all the brush was removed by the current owner. The removal of the landscape "buffer" left us exposed to dumpsters, piles of trash, stacks of pallets, on-site storage, bales for recycling, truck delivery traffic, excessive noise from refrigeration truck deliveries, etc. etc.

The back of the shopping center has become a neighborhood "nuisance" affecting the property values of our residences in violation of Para. 7 of the neighborhood's "Declaration of Conditions and Restrictions "Berwick Manor" which govern the neighborhood, including the shopping center.

Yet, none of the Proposed Exterior elevations (Figure 4) of the Draft Environmental Impact Report appears to address this issue. We deserve an acceptable design resolution to alleviate the problems noted above.

Thank you for your consideration.

Please confirm receipt of this email.

Ed J. Stellingsma, President - Mid Valley Garden HOA



Mid Valley Garden HOA faces the back-side of the one-block long shopping center.







ANTHONY LOMBARDO & ASSOCIATES

A PROFESSIONAL CORPORATION

ANTHONY L. LOMBARDO
KELLY MCCARTHY SUTHERLAND
JOSEPH M. FENECH
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144 W. GABILAN STREET
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(831) 751-2330
FAX (831) 751-2331

January 10, 2022

Our File No: 5268.000

Craig Spencer, Chief of Planning
Monterey County
Housing & Community Development
1441 Schilling Place
Salinas, CA 93901

RE: Mid Valley Shopping Center DEIR Comments

Dear Craig:

We have completed our review of the Mid-Valley Shopping Center (MVC) Draft Environmental Impact Report (DEIR) and offer these comments:

GENERAL COMMENTS

The County of Monterey has not designated the MVC to be an historic resource as defined by Monterey County Code Section 18.25.030 nor has the County made a decision that the MVC is an historic resource under the California Environmental Quality Act.

The MVC DEIR is the result of conflicting opinions of the historic significance of the MVC. The MVC DEIR however was prepared based on the assumption that MVC is a significant historic resource relying solely on the opinion of Diana Painter. The DEIR does not objectively analyze any of the numerous expert opinions which have been submitted to the County which reached an entirely different conclusion than did Ms. Painter nor does it examine potential mitigations other than adherence to the Secretary of the Interior's Standards.

The purpose of an EIR is to fully and objectively inform decision makers¹ of a project's² potential significant adverse environmental impacts³ based on substantial evidence⁴ in the record.

¹ The basic purposes of CEQA are to: (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities. (2) Identify ways that environmental damage can be avoided or significantly reduced. (3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible. (4) Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. (14CCR15002)

² "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment... (14CCR15378)

³ "Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant. (14CCR15382)

⁴ (a) "Substantial evidence" as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made

In this case, the DEIR should serve two purposes. First, it should provide evidence upon which decision makers can decide if MVC is in fact historically significant. Then, if the conclusion is that MVC is significant, inform the decision makers of the impact of the proposed project, possible alternatives and the affect that determination will have on the future of the MVC.

The DEIR does not at an early stage adequately disclose that finding a property or object to be historically significant is reserved solely to Monterey County Board of Supervisors⁵. Many statements imply that the Monterey County Planning Commission has a statutory role in that determination; they do not.

The MVC DEIR should discuss that the CEQA Guidelines provide decisions that the significance or lack of significance of the MVC may be based on the preponderance of the evidence.⁶

The DEIR does not address the significant adverse economic impact to the MVC if contemporary improvements are not allowed to proceed. Loss of those improvements could lead to the further demise of the MVC. Mr. Norm Hulbert, MAI has prepared the attached letter (Exhibit A) which goes into significant detail to assess the significant adverse economic impact designating MVC as historically significant will have. Mr. Hulbert concludes:

The unconstrained scenario reflects a value of \$10,080,000; however, it is necessary to spend about \$1 million to renovate the property. Thus, for comparison purposes we should view the unconstrained value as \$9,080,000. This compares with the historic scenario of \$5,901,000, a difference of \$3,179,000.

Impact of Increasing Vacancy Due to Historic Designation

Year	2	3	4	5	6
Vacancy	10%	20%	30%	40%	50%
NOI	\$531,077	\$495,491	\$459,781	\$424,018	\$388,616
Cap Rate	9.0	9.0	9.0	9.0	9.0
Value	\$5,901,000	\$5,505,522	\$5,108,000	\$4,711,311	\$4,317,955

We did not run the analysis beyond Year 6 because at that point it is likely the entire operation would collapse, from an economic point of view. Recall that the non-historic value was \$9,080,000 (net of \$1M renovation). By Year 6 over half the value has been lost.

that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence. (b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. (14CCR15384)

⁵ Section 18.25.090 A, Monterey County Code

⁶ See Guidelines Section 15604.5.b(2)(B); The party bearing the burden of proof must present evidence which is more credible and convincing than that presented by the other party or which shows that the fact to be proven is more probable than not (Merriam Webster).

The reader is reminded that in Years 2-6 the only change was the vacancy rate. We did not decrease the rent. In the face of escalating vacancy, it is nearly assured that management would be forced to lower rents to “whatever they could get.” Thus, we believe that value erosion above to be conservative. Again, this is not an appraisal; a number of simplifying assumptions have been made.

In conclusion, change is constant in retail centers. Competitors emerge, consumer tastes change, designs change. It is unheard of for a retail center to remain locked in design without suffering economically. We believe Mid Valley Center would be significantly impacted were it to be placed in an historic district.

The DEIR does not discuss that financial impact of a project can be a factor in making a decision on the project:

“failure to approve the application for a permit will cause an immediate and substantial financial hardship because of conditions peculiar to the particular structure or other feature involved, and the damage to the owner of the property is unreasonable in comparison to the benefit conferred to the community, the Review Board may approve or conditionally approve such permit even though it does not meet the standards set forth in this Chapter.”⁷”

OTHER EXPERT ANALYSIS

Ms. Painter’s conclusion that the MVC is historically significant is based on her opinion that Olof Dahlstrand was a “master architect” and that the MVC was at one time architecturally significant (there is no clear or convincing evidence that it was) and it has maintained its integrity.

Dr. Laura Jones (Appendix G) reviewed both Dr. Kirk’s and Laura Kozakavich’s (Page and Turnbull) opinions and on page 1 of her report detailed the areas of agreement and disagreement between the two. She wrote:

“This report, prepared for the owner of the property, reviews the arguments presented in two prior evaluations of the Mid Valley Shopping Center: an evaluation by Anthony Kirk and a second by Stacey Kozakavich. Both Kirk and Kozakavich concur that:

- The shopping center is not significant for association with significant events.
- The shopping center is not significant for association with significant people.
- The shopping center is not a rare or early example of a shopping center, even at the local level.
- The building located at the southeast corner (“Building C”) is not significant for architectural design, or as the work of a master.
- The shopping center is not eligible for information potential.
- The shopping center’s integrity has been “compromised” by alterations.

⁷ Section 18.25.175, Monterey County Code

Kirk further finds that:

- There is no documentation that Dahlstrand designed the service station.
- There is no evidence for the rumor that the exposed aggregate in the integrally colored concrete was mined from the Carmel River; specifications suggest it was obtained from local building suppliers without any special instructions.

The two reviewers disagree regarding

- Is the shopping center significant as the work of a master?
- Does the shopping center maintain integrity?

This review *examines the evidence (emphasis added)* regarding these two factors [work of a master and architectural integrity].”

Dr. Jones report is clear, thorough, balanced and direct. She wrote regarding Olof Dahlstrand:

“What conclusions can we draw from this evidence?

- Olof Dahlstrand was a competent local architect who successfully practiced in a style developed by a figure of recognized greatness: Frank Lloyd Wright. However, Dahlstrand is not mentioned in the scholarly literature on “Organic Architecture.”
- Olof Dahlstrand was a talented artist and illustrator.
- Olof Dahlstrand is not a “figure of generally recognized greatness.”
- The Carmel Valley Shopping Center was not “the work of a master⁸.”

The Kozakavich finding that the shopping center is significant as the “work of a master” is not well-supported. Kirk’s report finds that the shopping center is not a significant design by Dahlstrand by comparison to other buildings he completed in the Carmel region. There is therefore no strong evidence to support a finding of significance for the Mid Valley Shopping Center as the “work of a master”.

Dr. Jones then presents a substantial discussion of the MVC’s architectural integrity on a building-by-building basis. She found:

“Dahlstrand’s design called for the following colors and materials: wood shake roof, weathered grey redwood framing, integrally-colored brown precast concrete with exposed aggregate, bronze aluminum, anodized glass, clay block and off-white filler panels. Where these elements have been replaced, obscured or altered there is a loss of integrity.

Alterations to exterior elevations and landscaping have altered nearly every feature on the original plan.

⁸ Monterey County Code defines a master architect as one “whose talent influenced a particular architectural style or way of life” (Section 18.070.25 (5)).

The Mid Valley Shopping Center has lost integrity of setting, design, workmanship, materials, feeling and association.

The finding that the Mid Valley Shopping Center is eligible for listing on the California Register as the “work of a master” is not supported by evidence that Olof Dahlstrand is a “figure of generally recognized greatness.” No substantial evidence has been offered for eligibility of all or part of the shopping center as a historic resource.

Even if a new argument were assembled to support such a finding, the complex lacks integrity and cannot convey its original design intent. It is my professional opinion that the Mid Valley Shopping Center would not be eligible for listing in the National Register of Historic Places nor the California Register of Historical Resources. It also does not appear eligible for the Monterey County Local Official Register of Historic Resources, if nominated. I concur with Kirk’s evaluation in this regard.”

These same issues and related evidence, including work by Diana Painter, were evaluated by Dr. Barbara Lamprecht (Exhibit B [Executive Summary] and Exhibit C [Letter of Memorandum]). Dr. Lamprecht concluded:

“Mr. Dahlstrand is not a *“figure of generally recognized greatness in a field.”* His work was not published widely at the state or national levels, it did not have an impact on the architecture profession, and it did not influence its wider direction. The Center was not a formative or pivotal design in his career nor has it had an important impact on the Carmel community.”

“The Center does not *“embody the distinctive characteristics of a type, period, or method of construction.”* It blends a number of styles from various sources and time periods. Its construction, combining concrete, heavy timbers, exposed aggregate, and wood shake roof is common in commercial work.”

“The National Register requires that a property possess *high* artistic values in order to be eligible for designation. While the Carmel Valley Shopping Center is a good example of Mr. Dahlstrand’s work, it is not an outstanding or innovative expression of Modernist ideals or values. Its low, broad, wood shake roofs and deep overhangs are old and familiar features on the Peninsula and Carmel, from Julia Morgan’s iconic Asilomar, 1913, to the area’s rustic vernacular architecture set amidst woods and pines. Thus, these features are not “Modern,” as characterized in other reports, which also associated such features as primarily inspired by Frank Lloyd Wright...” (Note: On Page 7 of Dr. Lamprecht’s memorandum (Exhibit C) she writes “While clearly inspired by Wright, both Page & Turnbull’s and Painter Preservation reports suggest that Dahlstrand had a close connection to his hero, however, it appears that Dahlstrand never apprenticed or worked for Wright.”

“The Center appears to be derivative of the nearby Del Monte Shopping Center, designed by master architect John Carl Warnecke FAIA and built in 1967. Mr. Dahlstrand’s own records note that he did renderings of the Del Monte complex for Warnecke in 1960 and in 1964, and the two centers strongly resemble one another. With its buildings wrapping around a large parking lot, the Carmel Valley Shopping Center’s plan follows a common paradigm for postwar suburban shopping centers.”

“It does not demonstrate a new and thoughtful approach to addressing the pedestrian along with the car – as does the Del Monte center, whose “corridor” of varied landscapes champions pedestrians while relegating cars to the perimeter.”

“The Carmel Valley Shopping Center is *not* a historic district, as has been argued in a previous evaluation. A historic district is usually interpreted as a group of buildings that are perhaps constructed at different times by varied persons but are all related by a common theme. Designed by one person, at one time, as a holistic design, the Carmel Valley Shopping Center is a single property with multiple buildings.”

“Notably, while the Center does not appear to be eligible for designation, none of its buildings, rooflines, and materials are being demolished. It will remain a familiar part of the community, enhanced by sensitive renovations, new retail opportunities, and more community involvement.”

Dr. Anthony Kirk, the author of the initial historic evaluation, wrote to Brandon Swanson in January 2020 (Exhibit D). That letter, which was not included in the DEIR appendices, went into great detail identifying numerous factual errors in the Page and Turnbull report’s conclusion that MVC was historically significant. Dr. Kirk concluded:

Finally, in my opinion, the Carmel Valley Shopping Center is not a “Wrightian-inspired design.” Wright was a master architect, possibly the most important and celebrated of all American architects. He designed a single shopping center over the course of his lifetime, the Anderton Court Shops, a small three-story complex that is on the National Register of Historic Places.

In my opinion the Carmel Valley Shopping Center is not eligible for the National Register of Historic Places, the California Register of Historical Resources, or the Monterey County Local Register of Historical Resources.

Dr. Kirk subsequently wrote to our office (Exhibit E) in December 2021, after reviewing the DEIR and confirmed his opinion. He wrote:

I have carefully read the Mid-Valley Shopping Center Design Approval Draft EIR. It has not altered my original opinion of the Carmel Valley Shopping Center, which, as you recall, is that it does not meet the criteria for inclusion in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or the Monterey County Local Register of Historical Resources under Criteria A5, C1,

or C2. [and is flawed by its] reliance for much of the information it contains on the report written by Page & Turnbull, dated 11 November 2019.

As I stated at the outset of this letter, the Carmel Valley Shopping Center does not appear to be eligible for listing in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or 6. Monterey County Local Register of Historical Resources under Criteria A5, C2. Dr. Lamprecht concurs with me.

Dr. Kirk also wrote to Russ Stanley in December 2021 (Exhibit F) discussing in depth his conclusion that Olof Dahlstrand was not a “master architect.” He wrote:

Other sources make it evident that Olof Dahlstrand was not considered a master architect. He was never named a Fellow of the American Institute of Architects, an honor accorded designers “who have made outstanding contributions to the profession through design excellence, contributions in the field of architectural education, or to the advancement of the profession.” He is not among the 8,400 architects listed in the Pacific Coast Architecture Database, which includes designers in California, Oregon, and Washington. No examples of his work are included in the National Register of Historic Places, nor is he mentioned in *Architectural Record*.

Although the Carmel Valley Shopping Center may be considered an expression of Organic architecture, it is clearly not a good example of the style. Dahlstrand retired early, devoting the last thirty years of his life to art and public service. To date, no evidence has appeared that suggests he was a master architect.

SPECIFIC COMMENTS

Where possible, specific quotes from the DEIR will be provided. Our comments in response to the quote will be in *italics*.

Page 1-2:

The DEIR states “The significant effects are discussed with emphasis in proportion to their severity and probability of occurrence.”

We cannot find any discussion of proportionality or severity of the “significant effects” in the DEIR. The DEIR concludes that any change that does not meet the Secretary of the Interior’s Standards will have a significant adverse impact on the MVC.

The DEIR does not discuss alternative mitigations, such as an on-site photo history of the MVC and Dahlstrand, which may reduce the impact to a less than significant level.

The DEIR does not examine the nexus or rough proportionality of the proposed mitigation in relation to the project’s actual impact.

The DEIR states regarding Forecasting “the report preparers and technical experts used best available efforts to find and disclose all that it reasonably can.”

Page 3-9 of the DEIR is clear that the only professional opinion utilized in the EIR is that of Diana Painter⁹. The DEIR references other professional opinions and includes some of them as appendices, however the DEIR makes no effort to objectively and independently evaluate those opinions and balance the evidence they present.

The DEIR makes no effort to evaluate the potential adverse impacts¹⁰ that are readily foreseeable should the MVC fail to thrive nor does it consider the impact to future projects in the MVC should MVC be determined to be historically significant. It should be acknowledged that every future change, such as paint, windows, landscaping, signs, etc., will need to be evaluated against the Secretary of Interior Standards and be subject to an extensive review process. This laborious process will severely impact leasing efforts as very few, if any, tenants would be willing to wait through such a difficult, expensive and time consuming process when the tenant can instead lease space nearby without all the excessive costs, restrictions and limitations.

The DEIR does not discuss the benefit of changing roofing materials from shake to a more fire safe material and whether that benefit outweighs the potential impact of that portion of the project.

Page 1-3:

The DEIR states “In accordance with CEQA Guidelines section 15148, preparation of this draft EIR was dependent upon information from many sources, including scientific documents relating to environmental features.”

That statement is inconsistent with the DEIR’s statement on page 3-9 that the only professional document utilized in the DEIR is that of Diana Painter⁷.

Page 1-5:

The DEIR states “Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects.”

This statement implies that any comments that challenge the DEIR’s conclusion that the project will have a significant environmental impacts and offers substantial evidence to support that conclusion are not “helpful.” It is our opinion that comments, supported by substantial evidence, which challenge the DEIR’s conclusions are essential to the validity of the CEQA

⁹ “The following consistency analysis uses Painter Preservation’s historic resource opinion, as Painter Preservation is under the County of Monterey’s contract with EMC Planning Group. Therefore, Painter Preservation’s opinion represents an objective evaluation. (MVC DEIR page 3-9)”

¹⁰ 14CCR15382 A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

process and to the DEIR itself. Without such comments, the decision makers would be denied vital information they would need to make a fully informed decision.

Page 1-6:

The DEIR states “CEQA Guidelines section 15090 requires lead agencies to certify the final EIR prior to approving a project. The lead agency shall certify that the final EIR has been completed in compliance with CEQA, the final EIR was presented to the decision-making body of the lead agency and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project, and that the final EIR reflects the lead agency’s independent judgment and analysis.”

This statement is somewhat misleading in that it gives the impression that the Board of Supervisors (the lead agency) must agree with the conclusions of the DEIR that MVC is historically significant to approve the project. It should be made clear that following the EIR process the Board could certify the FEIR, and conclude based on the preponderance of the evidence in the record that MVC is not historically significant and approve the project or if it is found to be significant adopt a statement of overriding consideration and approve the project.

Page 2.2:

The DEIR states “This [the no project alternative] would return the shopping center to its “baseline” condition prior to the unpermitted alterations that occurred in 2019.”

The decision as to whether or not the MVC was significant at the time the baseline was established has not been made. There is substantial evidence in the record that the MVC was not and is not significant.

The DEIR states “Under this alternative, certain proposed exterior alterations to the Mid-Valley Shopping Center would be modified to ensure consistency with the Secretary of the Interior’s Standards.”

There is no specificity in this statement. Which “certain proposed exterior alterations” would need to be modified? Which would not? What degree of significance and impact can be attributed to those changes?

Page 2-5:

The DEIR states “Consideration of an affordable housing project on the site as a project alternative was not considered as such an alternative would not meet any of the project objectives and would likely result in greater environmental effects including demolition of a potentially significant historical resource.”

This statement does not provide important information to the decision makers:

The Affordable Housing Overlay (AHO) program is laid out in great detail in the 2010 Monterey County General Plan policy LU-2.11 to “encourage the development of affordable and

workforce housing projects...” The AHO program is also an essential factor in the County’s Housing Element and as a means for the County to meet its State mandated affordable housing requirements. By dismissing the alternative because it would “likely result in greater environmental effects”, the County is also seemingly dismissing the viability of the AHO in this location, particularly if the MVC is found to be a significant historic resource. The DEIR provides no analysis or evidence to support this conclusion. This discussion needs to be expanded to address, at a minimum, these questions:

- *Does designating the MVC to be a significant historic resource impede or preclude a change in use to residential use?*
- *Could all or portions of the MVC be converted to residential use and keep the features that are alleged to make the MVC significant?*
- *How many units could be provided on site based on existing levels of use for traffic, water and wastewater?*
- *The AHO is larger than the MVC. The AHO is approximately 13 acres, meaning the AHO was expected to be available for at least 130 units, but as many as 390 units. How does this conclusion of “greater environmental effects” affect the viability of the balance of the Mid-Valley AHO?*
- *How will the potential loss of units in the AHO be replaced?*

The DEIR states “If the Monterey County Planning Commission, or Board of Supervisors on appeal, finds that the property is not eligible for listing on the local, state, or national historic registers, then the County’s decision would reflect a review and approval/denial of the proposed project without an impact on a historical resource.”

This error is repeated throughout the DEIR. Chapter 18.45 of the Monterey County Code is clear that the determination that a property, building or specific features are a significant historic resource is solely the responsibility of the Board of Supervisors. We have previously noted this error appears many times in the DEIR. Going forward we will not note each instance.

Page 2-6:

The DEIR states “The shopping center’s status as a historical resource is an issue to be resolved and is the subject of this EIR.”

This statement is inconsistent with page 1-1 which states “This EIR is an informational document that is intended to inform the decision makers and their constituents, as well as responsible and trustee agencies of the environmental impacts of the proposed project and to identify feasible mitigation measures that would avoid or reduce the severity of the impacts.”

The DEIR states “In light of the differing conclusions of historic resource evaluations submitted by the applicant and those opposed to the project, the County has chosen to prepare an objective historic resource evaluation, which serves as the primary basis in this EIR for determining whether the shopping center is a historical resource under CEQA and to evaluate the proposed project’s significant environmental effects.”

We do not find the DEIR to present an objective evaluation (see Footnote 7). The DEIR seemingly accepts Ms. Painter's opinion and makes no effort to evaluate any other opinion, to provide a balance among the opinions or in any way compare or contrast the opinions of other experts. The DEIR deems the Painter opinion to be objective based solely on the fact that she acted as a subconsultant to EMC. There is no peer review of her opinion and no apparent critical review by EMC or the County of that opinion.

There is no explanation of why the significant evidence presented in the Kirk, Jones and Lamprecht analyses are not objective or are somehow in error.

Page 3-1:

The DEIR describes the project setting as if it were a static site. The project setting is a shopping center and as such has had constant changes since it opened and has continued to change since work on the DEIR started. The DEIR needs to identify numerous exterior changes (as did Dr. Jones) that have occurred since the MVC opened and evaluate the cumulative effect of those changes on the significance of the MVC. As noted earlier, Dr. Jones found:

Dahlstrand's design called for the following colors and materials: wood shake roof, weathered grey redwood framing, integrally-colored brown precast concrete with exposed aggregate, bronze aluminum, anodized glass, clay block and off-white filler panels. Where these elements have been replaced, obscured or altered there is a loss of integrity.

Alterations to exterior elevations and landscaping have altered nearly every feature on the original plan.

Page 3-2:

The DEIR states the "environmental baseline upon which project is assessed is the condition of the Mid-Valley Shopping Center prior to the 2019 unpermitted exterior alterations..."

That baseline is incorrect. The correct baseline is "physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced..."¹¹ It is established in case law¹² that the actual physical condition can include conditions which were created without benefit of permits and approvals.

Page 3-9:

The DEIR states "The following consistency analysis uses Painter Preservation's historic resource opinion, as Painter Preservation is under the County of Monterey's contract with EMC Planning Group. Therefore, Painter Preservation's opinion represents an objective evaluation."

¹¹ 14CCR15125

¹² *Riverwatch v County of San Diego* (1999) 76 CA4th 1428, 1451; *Fat v County of Sacramento* (2002) 97 CA4th 1270

As previously stated, the DEIR's assertion that Ms. Painter's opinion is objective is based solely on the fact she acted as a subconsultant to EMC and is highly questionable. There is no peer review of her opinion and no apparent critical review by EMC or the County of that opinion. The DEIR makes no effort to evaluate any other opinion, to provide a balance among the opinions or in any way compare or contrast the varying opinions.

Table 3-1:

Table 3-1 is misleading in that it lists policies and code sections and analyzes them as if the decision that the MVC is historically significant has already been made. It should be made very clear that decision is reserved solely for the Board of Supervisors and that decision has not yet been made.

The same policy analysis table should be included based on the conclusion MVC is not a significant resource.

Page 4-2:

The DEIR's statement of the purpose of the Design Control district is incomplete. The full, stated purpose is "to provide a district for the regulation of the location, size, configuration, materials, and colors of structures and fences, except agricultural fences, in those areas of the County of Monterey where the design review of structures is appropriate to assure protection of the public viewshed, neighborhood character, and to assure the visual integrity of certain developments without imposing undue restrictions on private property¹³." The key portion of this statement is that the regulation is not to impose an undue restriction on the use of the property. The DEIR should be clear in its discussion designating the MVC to be a significant historic resource will put severe restrictions on the property and be a barrier to the ability of the MVC to continue to evolve to meet the needs of the community and businesses.

Page 4-6:

The DEIR indicates the FEIR will be used to evaluate PLN190140, demolition permits and building permits. It is not clear if the FEIR will be used in the review and evaluation of future projects at the MVC and, if so, how that will potentially impact future projects and the continuing evolution of the MVC that will be needed to meet the needs of residents and businesses.

Page 5-11:

The DEIR states "However, the final determination of historical significance of the shopping center lies with the Monterey County Planning Commission, or the Board of Supervisors on appeal, with County staff and the County's Historic Resources Review Board serving in an advisory role."

¹³ Section 21.44.010 Monterey County Code

The Historic Resources Review Board's role has very specific responsibility. They are required to "recommend to the Board of Supervisors approval, approval with conditions, disapproval, or modification of the proposal. The Review Board's recommendation shall be in writing and shall include findings of fact [which will have to be supported by the preponderance of the evidence] relating to the criteria for designation contained in Section 18.25.070 of this Code that constitute the basis for the Review Board's recommendation"¹⁴."

Page 5-11 through 5-13:

This portion of the DEIR attempts to summarize the various other reports and opinions that have been submitted and are in the appendices. Providing summaries of other professionals' opinions in the DEIR is questionable as they may inadvertently convey the bias of the persons who prepared the summary and may not adequately or accurately convey the opinion expressed in those reports and opinions. The DEIR should clearly direct the reader to the appendices for the specific evidence and analysis of the respective writers.

It should also be noted that the January 3, 2020 letter from Dr. Kirk to Brandon Swanson (Exhibit D) is not included in the Appendix.

Pages 5-15 through 5-18:

These pages are essentially a summary of Diana Painter's conclusions. We believe Ms. Painter's evaluations (Appendices I, J and K) are seriously in error. We have attached independent opinions of experts (Exhibits B-F) all of which conclude Painter's findings of MVC's architectural significance and concluding that Olof Dahlstrand was a master architect are flawed and lack substantial evidence to support her conclusions

Pages 7-1 through 7-10:

The DEIR states "Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."

It is unclear to us as to why cumulative impacts require discussion in this DEIR. The project is a design approval and not a change of use from the existing shopping center. The issue is whether or not the MVC is historically significant. Neither the project at hand or that determination can be expected to generate a measurable impact much less one that could be "cumulatively considerable."

Pages 8-1 and 8-2:

We find the Impact Analysis to be confusing.

The DEIR states "Based on the environmental analysis provided in this EIR, most of the

¹⁴ Section 18.25.080 C, Monterey County Code

significant impacts of the proposed project can be reduced to less than significant by implementing mitigation measures presented in this EIR. However, the project would result in the following significant unavoidable impact as summarized below... a project that follows the Secretary of the Interior's Standards for Rehabilitation, shall be considered as mitigated to a level of less-than-significant impact on the historical resource... alternative design considerations prepared by Painter Preservation that would ensure exterior alterations for the shopping center would be consistent with the Secretary of the Interior's Standards for Rehabilitation. However, no feasible mitigation was determined based on the applicant's objectives and proposed alterations and site improvements."

It is not clear which of the impacts can be reduced and which cannot. What constitutes "most of the impacts"? As we discussed previously the conclusion seems to be there is no mitigation except the Secretary's Standards. But as we pointed out:

The DEIR does not discuss alternative mitigations, such as an on-site photo history of the MVC and Dahlstrand, which may reduce the impact to a less than significant level.

The DEIR does not examine the nexus or rough proportionality of the proposed mitigation in relation to the project's actual impact.

Page 10-2:

The DEIR states "While this alternative would not change the shopping center's ability to continue to operate as it currently does, this alternative would not permit the applicant to revitalize or modernize the shopping center as stated in the applicant's objectives. However, returning the shopping center to its baseline conditions would still allow for attracting new businesses, providing a local job base, and providing a range of businesses to local in one central location."

The DEIR presents no evidence to support this conclusion. The DEIR contains no economic analysis which would support a conclusion that the MVC will attract business and provide jobs if it cannot evolve the use and look of the Center to meet the needs of today's competitive and rapidly changing business environment.

The letter from Norm Hulbert (Exhibit A) presented earlier makes a clear case that the MVC, if it cannot improve and somewhat re-invent itself will eventually fail.

We hope you find these comments helpful and look forward to seeing the responses. Please call me if you have any questions.

Sincerely,


Anthony L. Lombardo



San Francisco Bay Area/Silicon Valley
55 South Market Street, Suite 1210
San Jose, CA 95113-1207
408-279-1520 phone
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January 7, 2022

Norman C. Hulberg, MAI
408-279-1520, ext. 7142
nhulberg@valbridge.com

Dale Ellis
Anthony Lombardo & Associates
144 W. Gabilan Street
Salinas, CA 93901

Re: Executive Summary
Economic Impact of Proposed Historic District Designation
Mid Valley Center, Carmel Valley, CA

Dear Mr. Ellis:

As requested, we have prepared an analysis of the likely economic impact of an historic district designation on Mid Valley Center. Our report is attached.

This center is 54 years old and already in need of repositioning and remodeling. This should be no surprise; most centers of this age need remodeling.

Valbridge appraised this property in 2011, for the prior ownership. Nominal rents today are substantially lower than in 2011. Adding that CPI has changed by 26% since that date, the rental drop in "real" rates is dramatic.

Vacancy today is 11.4%. Without the sort of changes that would likely be blocked by a historic designation, we expect vacancy to accelerate. The attached analysis indicates a value drop of \$5 million over a short time. When vacancy becomes too great, the operation is no longer sustainable and needs to close.

Thanks for the opportunity to provide this study.

A handwritten signature in blue ink that reads 'Norman C. Hulberg'.

Norman C. Hulberg, MAI
Senior Managing Director
California Certified License #AG003542

EXHIBIT A



San Francisco Bay Area/Silicon Valley
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January 7, 2022

Norman C. Hulberg, MAI
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VIA E-Mail Only

Dale Ellis
Anthony Lombardo & Associates
144 W. Gabilan Street
Salinas, CA 93901

Re: Evaluation of Proposed Historic District Designation
Mid Valley Center
Carmel Valley, CA

Dear Mr. Ellis:

As requested, we are pleased to provide an analysis of the likely impact of the proposed historic district designation on the economic viability of Mid Valley Center.

Our role in this analysis is not to appraise the property, nor is it to comment on the architectural merits of the center or the importance of the architect, Olof Dahlstrand. This is a general economic analysis. We are particularly mindful of the Monterey County Code 18.25.175 regarding "substantial financial hardship."

Life Cycle of Neighborhood Shopping Centers

As part of our study, we attempted to locate other properties or districts with a historic designation. We first sought to define the type of property represented by Mid Valley Center.

Shopping centers are generally classed based on size, measured in gross leasable area. As a general guideline, neighborhood shopping centers are the smallest, community centers are midsize, and regional centers are largest. Mid Valley Center has about 62,000 square feet of retail space, putting it in the neighborhood center category.

The second criterion for differentiating centers is the anchor tenant. A neighborhood center generally has only a supermarket anchor while a community center usually has a supermarket, a drug store, and perhaps a discount department store.

EXHIBIT 1.1 Characteristics of Shopping Centers

Type of Center	Population Support Required	Leading Tenant (Basis for Classification)	Typical GLA (Square Feet)	General Range of GLA (Square Feet)	Usual Minimum Site Area (In Acres)
Convenience center		Minimarket	20,000	Up to 30,000	
Neighborhood center	3,000-40,000	Supermarket	60,000	30,000-100,000	3-10
Community center	40,000-150,000	Supermarket, drugstore, discount department store	180,000	100,000-400,000	10-30
Regional center	150,000 or more	One or two full-line department stores	600,000	300,000-900,000	10-60
Superregional center	300,000 or more	Three or more full-line department stores	1,000,000	600,000-2.0 million or more	15-100 or more

Source: Retail Development (Washington, D.C.: Urban Land Institute, 2008), 9.

There are some non-traditional centers not represented in the table above, including lifestyle centers, festival centers, entertainment centers, outlets, and discount centers. The Barnyard is an example of a non-traditional center.

It is noteworthy that the Urban Land Institute table above lists the population support required for a neighborhood center as 3,000 to 40,000. Carmel Valley had a population of just 4,407 as of the 2010 census, down from 4,700 at the 2000 census.

A historic designation would largely lock Mid Valley Center into its present appearance and configuration, but

Retailing has changed forever. Big-box stores and category killers . . . and the Internet are where today's consumers shop. The competition is fierce, and consumers want it all: low prices, endless variety, the latest designs, parking at the door and an environment so entertaining that they go there even when they don't need to shop! (*Ten Principles for Rebuilding Neighborhood Retail*, Urban Land Institute, 2003)

Mid Valley Center is now 54 years old. There is no one exact age that caps the potential life of a center. Obsolescence includes factors external to the property, including competition, demographics, and local economics. By the standard of most centers in this region, Mid Valley Center is nearing the end of its natural life, without renovation. Typically, significant changes are made to centers by age 50+.

Even within the center, we see internal obsolescence where the theater was converted to self-storage. The era of single-screen theaters ended soon after this project was built, transitioning to multiplexes, then Blockbuster (bankrupt in 2010), and now Netflix.

Increasingly, neighborhood centers are not places where retail goods are sold. E-commerce sales have risen from 11.3% in Q4 2019 to 14% in Q4 2020. The trend is obvious, even after accounting for what is surely above-typical online sales during the COVID-19 pandemic.

Neighborhood centers survive by providing services, as opposed to selling goods. This includes restaurants. Services cannot be ordered online and delivered by Amazon (yet). Indeed, our review of the tenant roster at

Mid Valley Center indicates that Safeway and Ace Hardware are the only retailers left; all the other tenants are in the service industry.

Competition

Mid Valley Center is somewhat insulated from competition as it has the only grocery store in the immediate neighborhood. During the quarantine, sales at Safeway were up as they were for virtually all grocery stores. But the loss of Safeway would be devastating to this center—or any neighborhood center. It is not true that Safeway is guaranteed to always stay. This is small grocery by modern standards with just 20,832 square feet, as compared with a Safeway modern average of double, at about 46,000 square feet.

Safeway has exercised their lease for another five years, beginning March 2022. Could they move? Yes, a viable option would seem to be Valley Hills Center, one-half mile west. Or perhaps a competitor would build there (Trader Joe's usually has 8,000 to 15,000 square feet; Whole Foods has about 36,000 square feet). Existing competition comes from outside of the mid-valley as nearly all residents pass by the larger and more modern Lucky's (Carmel Rancho Center) and Safeway at The Crossroads. For the retailers at Mid Valley Center, these other centers are current threats.

Later in this analysis, we will provide an example of the economic impact of a historic designation.

Search for Historic-Designated Properties

In studying the impact of a specific constraint, such as a historic designation, it would in theory be ideal to evaluate the long-term viability of a property (or district) with an historic designation compared to a property unconstrained. To be meaningful, the properties should be as similar as possible.

We have conducted a nationwide search for neighborhood retail centers with a historic designation. We contacted over 400 appraisers and performed an internet search. We engaged historic preservation consultant Bonnie Bamburg of Urban Programmers to help find similar historic-designated properties. Ms. Bamburg searched a number of historic resources. It is noteworthy that, despite an extensive search, we were unable to find any centers remotely similar to Mid Valley Center, constrained by a historic designation.

There are countless individual historic properties and sometimes streets. These are usually in older urban centers. Ms. Bamburg reported that in Monterey County there are over 200 properties listed on historic registers. Most are significant in California history, or they are residences. Some are commercial buildings.

Often, a historic property consists of a single iconic building, such as a bank, church, or theater. Our Valbridge office has appraised many such properties. Depending on their location and configuration, sometimes they can be adapted to a modern use; for example, a bank that becomes an office or restaurant. Theaters, with their sloped floors and lack of windows, present a special challenge. Many remain vacant for years. In California, in the past, many of these iconic properties were "rescued" by funding by "redevelopment agencies." However, former Governor Jerry Brown shut down the state's 400 redevelopment agencies in 2011.

The Burbank Theater in San Jose (552 and 560 South Bascom Avenue) is a recent example of a property lost in a time warp due to an historic designation. Built in 1949, the building developed a checkered history over the decades, showing arthouse films and most notoriously adult films from the 1970s to 2000, when it was shut down as a public nuisance. It was briefly a dance studio, then foreclosed in 1999. The property sold last

month for \$1.6 million. The buyer's planned use is unknown. Were it not for the historic designation, the building would have surely been demolished and redeveloped years ago.



Historic Burbank Theater, San Jose

There are countless other examples where historic designation caused years-long delays and substantial economic impacts. Valbridge has appraised many such properties.

Town & Country Village Centers

Having failed to find a neighborhood retail center similar to Mid Valley Center that is constrained by a historic designation, we turned to the closest analog: suburban retail centers constrained by active politics.

In the 1950s and '60s "Town & Country Village" shopping centers in the Bay Area were in Palo Alto, San Jose, Mill Valley, and Sunnyvale, all developed by Ron Williams. Except for in Palo Alto, all these centers were razed and redeveloped by the 1990s. Similar properties by other developers were redeveloped in Sacramento, Phoenix, and Los Angeles.

The Town & Country Village projects were similar to Mid Valley Center, built just a decade or two earlier. This is not to suggest that these properties are identical to Mid Valley Center; they are much larger in scale and better located. But they are similar to each other and tell a tale of obsolescence. And similar to Mid Valley Center in design.

All were low-slung buildings, surrounded by a sea of parking and mostly catering to small tenants—exactly as with Mid Valley Center. The original projects had floor area ratios on the order of 20-25%. Today, most well-located commercial projects have at least double that density. Often other uses are incorporated in the center, such as office, residential, and sometimes lodging.

San Jose Town & Country

Perhaps the most famous redevelopment was the Town & Country in San Jose, a 40-acre property. At the same time Mid Valley Center was developed, a 1965 directory of shops and services of San Jose's Town & Country Village described the shopping center this way:

Town & Country Village is a charming, rustic wonderland of the finest stores in Santa Clara Valley. The low, rambling architecture of the Village is suggestive of an early California hacienda. Tree-lined islands divide ample parking areas, just steps away from stores. Spanish tile roofs shelter wide sidewalks, inviting all-weather shopping.

The San Jose shopping center was 30%+ vacant and tired in appearance by 1997 when Federal Realty bought the property and replaced it with a 1.5 million-square-foot, mixed-use "lifestyle" development known as Santana Row. It is surely one of the most iconic redevelopment projects in the state, providing employment, generating millions in sales tax revenue annually, and driving customers to nearby businesses. The project pays annual property taxes of \$9,780,000.

At this time, Federal Realty is finalizing approvals for "Santana West," directly across Winchester Boulevard from Santana Row. This is mostly an office project. Santana West has its own historic tale, which includes the demolition of the Century 22 and 23 theaters. The first of the domed theaters, Century 21, was required to be retained. This theater surely resulted in an economic loss to the developer as this is a one-story theater. The balance of project will consist of 1 million square feet of office, including heights up to eight stories.

Palo Alto Town & Country

In the absence of finding suburban shopping centers with an historic designation, we have considered an example of a shopping center that did not have a true historic designation but was "politically constrained." The best example is Palo Alto's 171,000-square-foot Town & Country shopping center, which is in a politically active, preservationist community.



Palo Alto Town & Country, 1960s

Alone among the Town & Country projects, Palo Alto continues, with 70 mostly small shops. The center was built in the 1950s as a specialty retail shopping center, similar to the other Town & Country Villages. It had fallen into significant disrepair and vacancy by the time it was purchased by Ellis Partners in 2004. Ellis specializes in renovations of retail and commercial properties and also redeveloped Pruneyard Shopping Center in Campbell.

The renovation project ran into vociferous community opposition and ended up being scaled back. Still, the extent of what was done is far beyond what would likely be allowed at Mid Valley Center. The \$30 million in remodeling included addition of a Trader Joe's.



Recent Photo, after \$30 million renovation and addition of Trader Joe's

At this time, the center is nearly a third vacant. Sales are down 60-80%, in part reflecting the impact of COVID.

Even before COVID, the center was having trouble. Ellis petitioned the City to allow medical offices in the vacant spots. The proposal was for no more than 10% of the center. Medical uses would not have been allowed facing El Camino Real or Embarcadero. In June 2021, the City Council voted against allowing retail-oriented medical services.

As with this Palo Alto project, Mid Valley Center has many spaces with poor visibility.

While Palo Alto is not "historic" and has far fewer constraints than the presumable constraints of Mid Valley Center, the difference between it and the former Town & Country Villages in San Jose and Sunnyvale are stark. San Jose and Sunnyvale have been completely redone with a much higher floor area ratio and mix of uses.

Value Impact of Historic Designation

We turn next to the economic impact of an historic designation. As discussed earlier, most neighborhood retail centers of the vintage of Mid Valley Center have either been renovated, razed, or are planned for major changes. The consequences of an inability to change with the times include:

- Decreasing occupancy rates
- Increase in lag time in signing leases, for example if a tenant has to go through a six-month process to get a sign approved
- Decreasing rents
- Lowering of tenant credit strength
- Diminished desirability of the property as an investment
- Loss of customers to competitors
- Decreased ability to obtain loans, whether for a purchase or renovation

We have compared two antiquated properties recently appraised by our office with more modern nearby retail centers to derive examples of differences in rent and occupancy.

Moonlite Shopping Center, at 2600 El Camino Real, Santa Clara, was built circa 1960 and contains 170,599 square feet of building area. The center is anchored by Save Mart Supermarket and Rite Aid. Typical rents in the center range between \$1.20 to \$2.37/square foot/month. The average is about \$2.00. The center is antiquated in appearance. **Actual rents are about 67% of prevailing rents in the immediate area.**

Another recent appraisal by our office was Lakewood Shopping Center, at 1119 Lawrence Expressway and 1037 Lakehaven Drive, Sunnyvale, built in 1959. The center is anchored by New Wing Yuan Market. Average in-line space rent at Lakewood Shopping Center is approximately \$2.00/square foot/month. Other shopping centers in the Sunnyvale area have typical in-line space rents of \$2.50 to \$3.50. **Actual rents are about 60% of prevailing market rent.**

There are countless examples of retail centers past their prime, with rents and occupancies less than modernized properties, even without historic constraints.

As an example of the potential value impact, we have prepared an example of a standard "income approach" used in appraising. Our template is the same as the one we used when we appraised Mid Valley Center for the previous owners in 2011. It is noteworthy that rents in the center today are substantially below the level of 11 years ago. The CPI index alone has increased 26% since that time. Thus, the financial performance of the center is nothing short of dismal. It is indeed in need of a facelift and repositioning.

In the following two tables we contrast two proformas: without a historic designation (assuming renovation of about \$1million) and with the historic constraint. The two schedules vary in this way:

- The historic scenario has rents of 20% less than the non-historic scenario. For simplicity, we begin with a retail vacancy rate of 10% level for this first set of analyses (p. 10 & 11) . The actual vacancy is now

11.4%. There can be no doubt that over time vacancy will increase. Later in this letter we will evaluate the impact of increased vacancy over time.

- Capitalization rate increases by 200 basis points between the two scenarios. The "cap rate" is the ratio of net income to property value. Less desirable investments sell at higher cap rates. An investor would be concerned about gradual erosion of economic viability.
- The "non-history" scenario assumes \$1million in renovation in the near future.
- Neither of these analyses includes the service station parcel, which is comparatively de minimis.

Income Approach: Non-Historic

Potential Gross Income

Retail Rental Income	\$60,000 /mo. x 12	\$ 720,000
Storage Rental Income	\$12,000 /mo. x 12	\$ 144,000
Other Income (Storage Operation)		\$ 300
Scheduled Reimbursements (Reimbursed CAM Expenses)		\$260,000
Total Potential Gross Income		\$ 1,124,300
Less Vacancy & Collection Loss (10% for Retail)		\$ 72,000
Less Vacancy & Collection Loss (18% for Storage)		\$ 25,920
Effective Gross Income (EGI)		\$ 1,026,380
Less Unrecaptured CAM Expenses:	\$290,000	
Less Non-Reimbursable Expenses		
Non-reimbursable management (1% of EGI)	\$ 10,263.80	
Reserves for entire center (2% of EGI)	<u>\$ 20,527.60</u>	
Total Non-Reimbursable Expenses	\$30,791.40	
Total Expenses:		
Total Expenses (31.3% of EGI)		<u>\$320,791</u>
Net Operating Income (NOI)		\$705,589
Divided by Capitalization Rate (7.00%)		7.00
Leased Fee Value Indicated by the Income Approach		\$ 10,079,837
Rounded to:		\$10,080,000

Income Approach: Historic Constrained

Potential Gross Income

Retail Rental Income	\$48,000 /mo. x 12	\$ 576,000
Storage Rental Income	\$12,000 /mo. x 12	\$ 144,000
Other Income (Storage Operation)		\$ 300
Scheduled Reimbursements (Reimbursed CAM Expenses)		\$220,000
Total Potential Gross Income		\$ 940,300
Less Vacancy & Collection Loss (10% for Retail)		\$ 57,600
Less Vacancy & Collection Loss (18% for Storage)		\$ 25,920
Effective Gross Income (EGI)		\$ 856,780
Less Unrecaptured CAM Expenses:	\$300,000	
Less Non-Reimbursable Expenses		
Non-reimbursable management (1% of EGI)	\$ 8,567.80	
Reserves for entire center (2% of EGI)	<u>\$ 17,135.60</u>	
Total Non-Reimbursable Expenses	\$25,703.40	
Total Expenses:		
Total Expenses (38% of EGI)		<u>\$325,703</u>
Net Operating Income (NOI)		\$531,077
Divided by Capitalization Rate (9.00%)		9.00
Leased Fee Value Indicated by the Income Approach		\$ 5,900,851
Rounded to:		\$5,901,000

The unconstrained scenario reflects a value of \$10,080,000; however, it is necessary to spend about \$1million to renovate the property. Thus, for comparison purposes we should view the unconstrained value as \$9,080,000. This compares with the historic scenario of \$5,901,000, a difference of \$3,179,000.

Certainly, there are many alternative possible analyses, and this is not a true appraisal, but it is easy to see that an aging center is a recipe for economic loss.

So, the above comparison is between what can be considered “before” and “after,” in other words, before the historic designation and after. In time, there is no doubt that the vacancy rate will increase. To illustrate the erosion of value over time, we prepared an analysis similar to the preceding table but with vacancy increasing in increments of 10%. This 10% equates to an average loss of 5,700 square feet per year. Only the conclusions are listed below with hypothetical years. Of course, the exact year these impacts hit will depend on a lot of factors, including competition and the local and national economies. Significantly, the next Safeway rollover is in 2027. If Safeway does not renew its lease, 39% of the total building would rollover. Surely, many small tenants would leave, and vacancy would be far above 50%.

In the table below, we treat the preceding analysis as representing Year 2. In other words, two years from now.

Impact of Increasing Vacancy Due to Historic Designation

Year	2	3	4	5	6
Vacancy	10%	20%	30%	40%	50%
NOI	\$531,077	\$495,491	\$459,781	\$424,018	\$388,616
Cap Rate	9.0	9.0	9.0	9.0	9.0
Value	\$5,901,000	\$5,505,522	\$5,108,000	\$4,711,311	\$4,317,955

We did not run the analysis beyond Year 6 because at that point it is likely the entire operation would collapse, from an economic point of view. Recall that the non-historic value was \$9,080,000 (net of \$1M renovation). By Year 6 over half the value has been lost.

A center with plummeting occupancy has plummeting rental rates. The owner is less incentivized to invest in the center; operating expenses overwhelm the paltry gross income and the center closes. For Mid Valley, the property does have a general plan overlay of affordable housing, and it would likely be necessary to pursue such a redevelopment. Of course, with an historic designation, there would be a long process necessary to be able to demolish the center. We would, however, expect that eventually such approval would be granted, rather than leaving a decrepit, vacant center in place.

The reader is reminded that in Years 2-6 in the above table the only change was the vacancy rate. We did not decrease the rent. In the face of escalating vacancy, it is nearly assured that management would be forced to lower rents to “whatever they could get.” The cap rate would increase, as the desirability of the investment plummets. Thus, we believe the value erosion above to be conservative. Again, this is not an appraisal; a number of simplifying assumptions have been made.

In conclusion, change is constant in retail centers. Competitors emerge, consumer tastes change, designs change. It is unheard of for a retail center to remain locked in design without suffering economically. We believe Mid Valley Center would be significantly impacted were it to be placed in an historic district.

Dale Ellis, Esq.
January 7, 2022
Page 12 of 15

A handwritten signature in blue ink that reads "Norman C. Hulberg". The signature is written in a cursive, flowing style.

Norman C. Hulberg, MAI
Senior Managing Director
California Certified License #AG003542

Qualifications of Norman C. Hulberg, MAI Senior Managing Director

Valbridge Property Advisors | Northern California



Independent Valuations for a Variable World

State Certifications

Certified General
State of California

Education

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Business Administration
San Jose State University

Bachelor of Science
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Membership/Affiliations

Member: Appraisal Institute – MAI Designation
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Appraisal Institute & Related Courses

Continuing education courses taken through the Appraisal Institute and other real estate organizations.

Experience

Senior Managing Director

Valbridge Property Advisors | Northern California (2013-Present)

President

Hulberg & Associates, Inc. (1976-2013) (joined to create Valbridge in 2013)

Appraisal/valuation and consulting assignments include: Single-family, condominium, apartments, land, mobile home parks. Office buildings, hotels/motels, service stations, retail, vacant land. Industrial plants, research and development, warehouses, data centers. Fractional interest valuations, contaminated properties, special purpose properties, feasibility studies, market studies, condemnation, construction defects, litigation support, mediations, arbitrations and review appraisals.

Mr. Hulberg has provided valuation services in a wide variety of complex civil litigation including real estate, land use cases, condemnation, estate matters, property taxation, contract disputes, partnership and corporate disputes, environmental lawsuits, professional negligence cases, construction defect, and bankruptcy/creditors matters.

Qualified as an expert witness in most counties in the San Francisco and Monterey Bay and Central Valley areas, as well as and in the U.S. Tax Court in the U.S. District Courts in San Jose, San Francisco, Oakland, and Las Vegas. He is a highly experienced forensic appraiser, having provided testimony on over 300 occasions. This includes over 100 jury trials in state and federal courts in addition to numerous court trials. He has also testified in major arbitrations and before state and federal courts, as well as private arbitrations.

STANDARD TERMS OF CONSULTING ASSIGNMENT

1. Acceptance of this agreement assumes that our client will provide all necessary information needed for the assignment on a timely and truthful basis, and assumes that the client will provide sufficient access to the property to be appraised. A delay in receipt of information may delay completion of the assignment.
2. The fee quoted is based on our understanding of the assignment as outlined in the scope of work. Changes in scope will be billed at our normal hourly rates. If any employee of Valbridge | Hulberg is asked or required to appear and/or testify at any meeting, deposition, trial, or other proceeding about the preparation, conclusions, or agreement, client shall compensate employee for the time spent in appearing and/or testifying and in preparing to testify according to the employee's then current hourly rate, plus expenses.
3. The fee and estimated completion time are subject to change if the property is not as outlined in our proposal, or if issues come to light during the course of our investigation which, in our opinion, necessitate such change. If the client places an assignment "on hold," then reactivates the assignment, an additional charge may apply due to inefficiency created.
4. The Valbridge Property Advisors office responsible for the preparation of this report is independently owned and operated by Hulberg & Associates, Inc. Neither Valbridge Property Advisors, Inc. nor any of its affiliates has been engaged to provide this report. Valbridge Property Advisors, Inc. does not provide evaluation services, and has taken no part in the preparation of this report.
5. If any claim is filed against any of Valbridge Property Advisors, Inc. a Florida Corporation, its affiliates, officers or employees, or the firm providing this report, in connection with, or in any way arising out of, or relating to, this report, or the engagement of the firm providing this report, then (1) under no circumstances shall such claimant be entitled to consequential, special or other damages, except only for direct compensatory damages and (2) the maximum amount of such compensatory damages recoverable by such claimant shall be the amount actually received by the firm engaged to provide this report.
6. This report and any associated work files may be subject to evaluation by Valbridge Property Advisors, Inc. for quality control purposes. If Client is unwilling to waive confidentiality for this purpose, client must inform Valbridge | Hulberg upon acceptance of this assignment.
7. Should the assignment be terminated prior to completion, you agree to pay for time and costs incurred prior to our receipt of written notice of cancellation. If this assignment includes a provision for work performed on an hourly billing basis, such work is subject to periodic adjustment to our then-current rates. Valbridge | Hulberg shall provide 30 days' notice to client prior to any rate increase. If client chooses not to consent to the increased rates, client may terminate Valbridge | Hulberg's services by written notice effective when received by Valbridge | Hulberg.

8. You and Valbridge | Hulberg both agree that any dispute over matters in excess of \$5,000 will be submitted for resolution by arbitration. This includes fee disputes and any claim of malpractice. The arbitrator shall be mutually selected. If Valbridge | Hulberg and the client cannot agree on the arbitrator, the presiding head of the Santa Clara County Mediation & Arbitration panel shall select the arbitrator. Such arbitration shall be binding and final. In agreeing to arbitration, we both acknowledge that, by agreeing to binding arbitration, each of us is giving up the right to have the dispute decided in a court of law before a judge or jury. In the event that the client, or any other party, makes a claim against Hulberg or any of its employees in connection with or in any way relating to this assignment, the maximum damages recoverable from Valbridge | Hulberg or its employees shall be the amount of monies actually collected by Valbridge | Hulberg for this assignment, and under no circumstances shall any claim for consequential damages be made.
9. Valbridge | hulberg shall have no obligation, liability, or accountability to any third party. Any party who is not the "client" or intended user identified on the face of the assignment or in the engagement letter is not entitled to rely upon the contents of the report without the express written consent of Valbridge | Hulberg. "client" shall not include partners, affiliates or relatives of the party named in the engagement letter. Client shall hold Valbridge | Hulberg and its employees harmless in the event of any lawsuit brought by any third party, lender, partner or part owner in any form of ownership or any other party as a result of this assignment. The client also agrees that in case of lawsuit arising from or in any way involving these appraisal services, client will hold Valbridge | Hulberg harmless from and against any liability, loss, cost or expense incurred or suffered by Valbridge | Hulberg in such action, regardless of its outcome.
10. Distribution of this report is at the sole discretion of the client, but no third parties not listed as an intended user on the face of the assignment or engagement letter may rely upon the contents of the report. In no event shall client give a third party a partial copy of the report. We will make no distribution of the report without the specific direction of the client.
11. This agreement contains the entire agreement of the parties. No other agreement, statement or promise made on or before the effective date of this agreement will be binding on the parties. This agreement may only be modified by subsequent agreement of the parties.

Executive Summary
Carmel Valley / Mid Valley Shopping Center
9550 Carmel Valley Road, Carmel, County of Monterey
Olof Dahlstrand, Architect; completed 1966 - 1967
Lack of Eligibility, Criterion C, National Register of Historic Places
April 2021

Criterion C: *The property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.*

a. The Center does not “*embody the distinctive characteristics of a type, period, or method of construction.*” It blends a number of styles from various sources and time periods. Its construction, combining concrete, heavy timbers, exposed aggregate, and wood shake roof is common in commercial work.

b. The Center does not “*represent the work of a master.*” While Olof Dahlstrand was a locally respected architect and acknowledged in Carmel and Monterey County, as analyzed according to National Register Bulletin 15, federal General Services Administration tools for evaluating Modernist buildings, and other sources named in the various evaluations, Mr. Dahlstrand is not a “*figure of generally recognized greatness in a field.*” His work was not published widely at the state or national levels, it did not have an impact on the architecture profession, and it did not influence its wider direction. The Center was not a formative or pivotal design in his career nor has it had an important impact on the Carmel community.

c. The Center does not “*possess high artistic values.*” The National Register requires that a property possess *high* artistic values in order to be eligible for designation. While the Carmel Valley Shopping Center is a good example of Mr. Dahlstrand’s work, it is not an outstanding or innovative expression of Modernist ideals or values. Its low, broad, wood shake roofs and deep overhangs are old and familiar features on the Peninsula and Carmel, from Julia Morgan’s iconic Asilomar, 1913, to the area’s rustic vernacular architecture set amidst woods and pines. Thus, these features are not “Modern,” as characterized in other reports, which also associated such features as primarily inspired by Frank Lloyd Wright, instead of looking at the obvious regional sources close to hand. Furthermore, the Center appears to be derivative of the nearby Del Monte Shopping Center, designed by master architect John Carl Warnecke FAIA and built in 1967. Mr. Dahlstrand’s own records note that he did renderings of the Del Monte complex for Warnecke in 1960 and in 1964, and the two centers strongly resemble one another. With its buildings wrapping around a large parking lot, the Carmel Valley Shopping Center’s plan follows a common paradigm for postwar suburban shopping centers. It does not demonstrate a new and thoughtful approach to addressing the pedestrian along with the car – as does the Del Monte center, whose “corridor” of varied landscapes champions pedestrians while relegating cars to the perimeter.

d. The Center does not “*represent a significant and distinguishable entity whose components may lack individual distinction.*”

Per National Register Bulletin 15, this section of Criterion C refers to districts. The Carmel Valley Shopping Center is *not* a historic district, as has been argued in a previous evaluation. A historic district is usually interpreted as a group of buildings that are perhaps constructed at different times by varied persons but are all related by a common theme. Designed by one person, at one time, as a holistic design, the Carmel Valley Shopping Center is a single property with multiple buildings.

In conclusion, the Carmel Valley Shopping Center fails to meet any of the thresholds required for listing in the National Register of Historic Places.

Notably, while the Center does not appear to be eligible for designation, none of its buildings, rooflines, and materials are being demolished. It will remain a familiar part of the community, enhanced by sensitive renovations, new retail opportunities, and more community involvement.

EXHIBIT B

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April 2021

Brandon Swanson
Interim RMA Chief of Planning
Monterey County Resource Management Agency
1441 Schilling Place
Salinas, CA 93921

RE: **Letter of Memorandum, Carmel Valley (Mid Valley) Shopping Center**
9550 Carmel Valley Road, Carmel Valley
APNs 169-234-007-000, 169-234-008-000
Planning Area: Carmel Valley Master Plan

Dear Mr. Swanson,

On behalf of The Stanley Properties, I was asked to review the findings regarding the 6.5-acre Carmel Valley Shopping Center, primarily completed in 1967. As a qualified architectural historian, I was also asked to provide an evaluation of the property's eligibility for designation in consideration of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and Monterey County Local Register of Historic Resources and its status as a historical resource under the California Environmental Quality Act (CEQA) § 21084.1, and CEQA Guidelines section 15064.5. There have been four architectural historians involved with this project, each submitting reports, evaluations, and letters.

The property is variously called the Carmel Valley Shopping Center, its original name, and more recently the Mid Valley Shopping Center; throughout this report it is referred to as the Mid Valley / Carmel Valley Shopping Center to avoid any confusion.

Purpose of this Letter of Memorandum

These previously submitted documents contain much background data, extensive descriptions of the property, considerations of Olof Dahlstrand's (1916 – 2014) prominence as an architect, and assessments of the property's significance and integrity. Rather than reiterate this material, the objective here is to concisely lay out the principle arguments for my own finding, that the subject property does not meet the requirements for designation under Criterion C, architecture, the National Register of Historic Places, Bulletin 15.¹ This assessment concurs with those of qualified architectural historians Dr. Anthony Kirk and Dr. Laura Jones, Director of Heritage Services, Stanford University.

Consultant Qualifications

To ensure an objective and professional evaluation, cultural resource studies are typically carried out by specialists for the relevant field of study, in this case architectural history. The standards for such specialists

¹ The California Register's criteria for designation, 1 – 4, are patterned after the National Registers letters A – D, which will be used here with the understanding that eligibility for the latter extends to the former.

Letter of Memorandum, Carmel Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, March 2021, Dr. Barbara Lamprecht 1

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careers or the profession.”³ For example, Wright’s Robie House, Chicago, 1910; Falling Water, Bear Run, Pennsylvania, 1937; his Usonian designs of some sixty houses of the 1930s, ‘40s, and ‘50s; and the Guggenheim Museum, New York, 1959, were all were pivotal projects in Wright’s career and additionally were profoundly influential in the world of architecture, extensively written about and publicized in many books, articles, and scholarly papers.

Just as National Register qualifies the work of a master as needing to be a particular kind of milestone in the master’s oeuvre, some other agencies also qualify their definitions. The Historic Landmark criteria for the City of Beverly Hills, for example, requires not only that a resource possess high artistic or aesthetic value, but it also must be an “exceptional” work by a master. Along the same lines, the County of Monterey qualifies its definition of master with a tall order: a building must be not only by a great (“master”) architect, but they must be one “whose talent influenced a particular architectural style or way of life.”

Existing Reports and Findings

Prepared by four different architectural historians, there have been five major evaluations and other letters related to the project. The five major reports are:

1. Sept. 9, 2019. An evaluation of the Center by Dr. Anthony Kirk, for The Stanley Properties
2. Nov. 19, 2019. A Phase One Historic Assessment with DPR 523A and 523B form prepared by Page & Turnbull for the Carmel Valley Association
3. Oct. 16, 2020. A report by Dr. Laura Jones, Heritage Resources Consulting, for The Stanley Properties
4. Nov. 4, 2020. A second Assessment Report by Dr. Kirk for The Stanley Properties
5. Dec. 21, 2020. A Historic Resource Evaluation/Phase I Assessment by Painter Preservation requested by the County of Monterey and funded by The Stanley Properties

Previous Significance Statements finding the Center eligible under Criterion C Page & Turnbull

“The Mid Valley Shopping Center appears to be individually eligible under Criterion C/3 (Architecture) for its association with locally prominent architect, Olof Dahlstrand. The shopping center exemplifies Dahlstrand’s use of form and material in a Wrightian-inspired design that respects the features of its surrounding natural environment. Though an undoubtedly commercial complex, Frank Lloyd Wright’s influences can be seen in the use of naturalistic materials and dramatic roof lines echoing the surrounding hill slopes. Further, it is a unique example of the application of the architect’s work to a large suburban commercial complex, with integrated vehicle parking and circulation in addition to pedestrian walkways and courtyards. Most of Dahlstrand’s work consisted of individual residential and commercial buildings. In contrast, this appears to be one of only two shopping centers designed by the architect. The other, Carmel Plaza, represents a more urban location designed for a primarily pedestrian clientele. While the multi-building courtyard style of the

³ Ibid., p. 54.

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Per National Register Bulletin 15, a *master architect* is

“ ... a figure of generally recognized greatness in a field ...”

California’s Office of Historic Preservation has no guidance for the definition of a “master” other than that provided above.

Note that the language refers to “greatness.” How is greatness measured? Essentially, a “master architect” adds something—an innovation, some new method, idea, approach—to the discourse of architecture. That is, an element that is special, enduring, and recognized. Examples of master architects include:

- . Julia Morgan, who was mentored by Bernard Maybeck
- . William Wurster, who was mentored by Maybeck
- . Frank Lloyd Wright, who worked for the great nineteenth-century Chicago architect Louis Sullivan
- . Irving Gill, who worked under both Sullivan and Wright
- . John Lautner, who apprenticed with Wright
- . Helena Araheute, who worked for John Lautner
- . Albert Frey, the Swiss-American, Palm Springs-based architect, who worked for Le Corbusier
- . Richard Neutra and Rudolf Schindler, who both studied under Adolf Loos in Vienna

There are many other examples of such masters who studied and worked for others, but critically, all went on to make contributions to the profession and to humanity that were also distinctly individual.

Clearly there is a fine line between a Master and an excellent architect. Because it is often a subjective assessment, it calls for a framework for a more objective evaluation. However, as no such comprehensive framework exists, this evaluation is based on many sources, including:

- . The National Register’s definition, cited above
- . Appearances and discussions in data bases and historic context reports
- . The American Institute of Architects (AIA) criteria for the prestigious title Fellow, with outstanding, distinguished or lasting contributions in one of five categories:⁴
 - a. design, urban design or preservation
 - b. education, research literature, or practice
 - c. led the AIA or related organization
 - d. public service, government, industry, or organization
 - e. alternative career, volunteer work, or service to society
- . Broad recognition by the public
- . Respect of peers, demonstrated in professional recognitions and awards
- . Buildings landmarked or eligible for designation

⁴ <https://www.aia.org/awards/7076-fellowship>

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Dahlstrand is noted three times in *NorCalMod: Icons of Northern California Modernism* (Chronicle Books, 2006) written by architect, architectural historian, and scholar of Northern California Modernism Pierluigi Serraino, who interviewed Dahlstrand in 2003 as one of the Bay Area architects practicing Modern architecture in mid-century. Serraino's goal was to recast Modernism as interpreted by Northern California architects and to illuminate the little-known or unknown contributions of these individuals. However, by contrast to many other such prominent and lesser-known architects whose work is included in photographs and discussed in the text, the book does not include any photographs of work by Dahlstrand, his contributions are not discussed, and he is not included in the 36 pictorial biographies of architects and two photographers included at the end of the book.¹²

Dahlstrand's work "has been recognized as part of the larger body of Modernist architecture of the Monterey Bay area, included in presentations by Serraino's March 2019 lecture series for the Monterey Bay Chapter of the American Institute of Architects, 'Which Modernism is the Monterey Bay?' and historian Kent Seavey's *Carmel: A History in Architecture*."¹³

Olof Dahlstrand: The Usonian, 2007, Brook House Press, was written by Bill [sic] and Bea Welty. The self-published, 72-page book, focuses on the seven "Usonian" houses designed by Olof Dahlstrand between 1951 and 1958 (the first one, the Muscatine Residence, was designed by Dahlstrand's employer at the time, Fred and Lois Langhorst Architects; Dahlstrand was responsible for two additions.) Notably, the designs for the Dahlstrand "Usonian" (a pioneering concept developed by Wright in the late '1930s and '40s on behalf of middle-class owners in search of good design at a more modest price) follow Wright's work closely, using several identical details including Wright's famous 30-60 degree angles and triangles for defining spaces, horizontally oriented wide wood batten siding, mitred windows, textured concrete block, interior soffit lighting, angled concrete block fireplaces, and furniture design. While clearly inspired by Wright, both Page & Turnbull's and Painter Preservation reports suggest that Dahlstrand had a close connection to his hero, however, it appears that Dahlstrand never apprenticed or worked for Wright.

The occasional article and announcement on Dahlstrand were more likely to highlight his homes; a few articles on his commercial work appeared in local newspapers and rarely in national publications:

- . "Downtown Center for an Unusual West Coast Town," *Architectural Record*, June 1962
- . "Making it Fun to Shop," *Redwood News*, January 1963
- . A 2008 article in *SF Gate* titled "Work of Modernist Olof Dahlstrand Revisited in the East Bay. Here, architectural historian Serraino notes that Dahlstrand's work has a "strong Wrightian influence, but they are not totally derivative." The article's author, Joanne Furio, also notes that "one of the ways that Dahlstrand distinguished himself was through the use of sliding doors

¹² Pierluigi Serraino, *NorCalMod: Icons of Northern California Modernism* (San Francisco: Chronicle Books, 2006.) Dahlstrand is noted briefly on pp. 20, 59, 79.

¹³ Page & Turnbull, *ibid.*, citing Kent Seavey, *Carmel: A History in Architecture* (San Francisco: Arcadia Publishing, 2007), 113.

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3. The update lists the Wells Fargo Building, 1965, (San Carlos south of Ocean) as a “notable Carmel example” of the “Midcentury Modern/Bay Region Style (c1945 – 1990.)”²⁰ Dahlstrand is also credited with the design of the Nielson Market, 1979.

4. Dahlstrand is not noted in the Pebble Beach Historic Context Statement, 2013.²¹

Public Service

Dahlstrand has been widely acknowledged for his community involvement, which included advocating a “holding capacity” for Carmel based on the area’s “ecological limitations.”²² He was a member of the tree commission and the travel advisory board; he served on the Planning Commission for nine years and on the Carmel City Council for three years, and was “actively engaged with Carmel’s local politics when not in office.”²³ After his retirement from architecture in 1984, at the age of 68, he integrated his skills as a renderer with his love of fine arts painting.

Recognition by Peers, Awards

Primary sources, especially living people, are invaluable resources for recollections. Donald Wald is the retired founding principal of the Monterey-based architecture firm Wald, Ruhnke & Dost Architects, LLP. Founded in 1963, it is one of the oldest and largest firms in the Monterey-Carmel Valley area. Wald served in various executive positions of the Monterey chapter, American Institute of Architects, and served the standard one-year term in 1970 as the chapter’s president. Of Dahlstrand, he said, “He was a good architect, not bad ... we had a lot of good ones at the time. He did some nice work.” Wald said that Dahlstrand was not well known for his architecture among local practitioners but said that he was very active in the Carmel Arts Association and highly regarded as a fine artist. Wald named other figures such as Francis Palms, Bob [Robert] Jones, Bob [Robert] Stanton, and the firm of Burde, Shaw & Kearns as well-regarded local practitioners in mid-century Carmel and Monterey.

While attending Cornell University’s School of Architecture, Dahlstrand was the 1939 winner of the Architecture Prize, a competition sponsored by the alumni of the American Academy of Rome.

Dahlstrand consistently won local awards for his paintings.

²⁰ Carmel Update, 2019, p. 21. The text notes that this style, marked by natural materials, “dramatic” roof lines, low-pitched or hipped, is also called the Bay Area Style and also the Second Bay Tradition. By contrast, the Update states that the “Organic” style is marked by “larger ... and more eccentric” designs than the Bay Region Style, and that it is a philosophy established by Frank Lloyd Wright, rather than a Style.

²¹ Page & Turnbull, Pebble Beach Historic Context Statement, Monterey County, 2013.

²² *Adventures of a Home Town Tourist*, March 27, 2017, <http://carmelbytheseaca.blogspot.com/2017/03/>

²³ 2019 Update, Carmel Historic Context Statement 2019, 17.

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1. Carmel Plaza, 1960



Carmel Plaza, former I. Magnin building. Camera facing southwest. Photo by author.

According to the Page & Turnbull report, “Dahlstrand’s first shopping center in the area was the Carmel Plaza, centrally located in Carmel-by-the-Sea southwest of the intersection of Junipero Street and Ocean Avenue. Designed in multiple parts between 1959 and 1965, the portion of the much-altered center which today is most recognizably Dahlstrand’s is the 1960 store at the southeast corner of Ocean Avenue and Mission Street which was originally designed for I. Magnin & Company.”²⁹

However, research suggests a more complicated provenance for this corner building, the original I. Magnin (on the corner of Ocean Avenue and Junipero Street, not Ocean Avenue and Mission Street.) On March 15, 1960, the *San Francisco Chronicle* noted that Los Angeles architect Harold Chambers designed the one-story corner building. Harold Coulson Chambers Sr. was a Southern California architect who designed at least two other I Magnin stores in the late 1930s/early ‘40s with famed architect Myron Hunt, practicing as the firm Hunt and Chambers.³⁰ In reviewing I. Magnin stores on the website “thedeartmentstoremuseum.org” it can be seen that a consistent signature style for the upscale brand was the use of alternating vertically oriented panels of either glass or a material that was a contrast in color, texture, and depth to adjacent panels, setting up a clearly defined rhythm (see especially the stores: Santa Ana, 1958; Walnut Creek, 1967; Sherman Oaks, 1962; and Del Amo Fashion Square, 1967.)³¹

By contrast, an undated rendering in the Dahlstrand archives, also attached, states that the architect for the project was not Harold Chambers but Francis Palms, who “furnished the rendering of the project to the newspaper.” The design of the I. Magnin building of the Palms design is very similar to that of the Chambers design, especially pronounced in the rhythm of full-height solid white walls alternating with the “voids” of full-height windows. The rendering is stylistically very similar to Dahlstrand’s own renderings.

²⁹ Page & Turnbull, *ibid.*

³⁰ <http://pcad.lib.washington.edu/firm/327/>

³¹ <http://www.thedeartmentstoremuseum.org/search?q=magnin>

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Carmel Plaza Historic Block plans will be presented officially to the Carmel Planning Commission at its study session Wednesday. The elevation above, furnished by Francis Palms, architect for the project, shows the Ocean Avenue-Jupiter Street Institute as you would see it if you were standing on the northeast corner of Ocean and Jupiter. Pine pictured in the center Ocean Avenue planting is the Carmel Christmas tree. At the far right is the Bank of America building (Cowan and Mission) flanked by a small shop, which faces on the Main. Left of the Mail is Magnin's former site (wood and concrete). The two plans are on the front property, and will not be disturbed by Jupiter Street.

Unknown source, in Berkeley Archives adjacent to Chronicle clipping. Francis Palms is noted as architect

FRIDAY, MAY 15, 1959.



A 100' x 100' OVERLOOK, THURSDAY

PUNTON PROJECT—This is an artist's sketch of three commercial structures planned by Leslie C. Fenton for the south side of Carmel's Ocean Avenue, between Jupiter and Mission. All were designed by Carmel architect Olof Dahlstrand. Shown at far left is L. Magnin and Co. women's apparel shop. At opposite end of block will be a Bank of America branch. That building will also contain up to three shops. Structure between bank and Magnin's will have up to five stores. Building materials will be primarily "off-white" concrete brick and naturally weathered redwood. Stevenson Pacific Inc. and James L. Barnes Construction Co. of Redwood City are expected to begin work in about six weeks. The project will involve demolition of the Carmel Theater building.

The Monterey Peninsula Herald, May 15, 1959. Olof Dahlstrand noted as architect. Note that while the second story of the L. Magnin store has been removed, the ground story has remained the same.

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The Wells Fargo Bank, 1960. Upper photo, camera facing west. Lower photo, camera facing northeast. Photos by author.

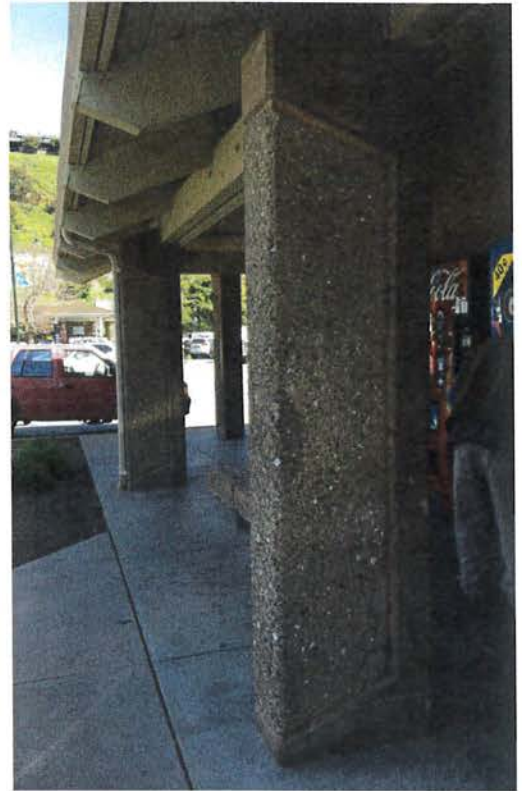


Sited perpendicular to San Carlos Street, the bank provides a quiet and strong statement in contrast to the surrounding busily decorative retail context of Ocean Avenue. Its unusually long cantilevered shed copper roof is anchored on the north by an incised, stepped, and crenellated volume of earth-colored stained concrete and exposed aggregate. Rising to meet this volume, the seemingly weightless roof simultaneously looms over and invites users into the broad pedestrian walkway leading east along long windows and brown tile walls to the entry. Engaged pilasters comprise earth-colored stained, board-formed, incised concrete forms that frame a U-shaped cladding of exposed aggregate. (In a slightly different form, these

Letter of Memorandum, Carmel Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, March 2021, Dr. Barbara Lamprecht

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Building C, the former Valley Cinema, now Iolis' Pizzeria, camera facing east, above. Typical columns for the Mid Valley / Carmel Valley Shopping Center, right. Note similarity to the pilasters of Wells Fargo Bank, Carmel-By-The-Sea. Photos by author.



*Letter of Memorandum, Carmel Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, 17
March 2021, Dr. Barbara Lamprecht*

The rear of the former Valley Cinema, Building C, adjacent to Berwick Drive, the eastern edge of the property. Camera facing northwest. Photos by author.

modern resources

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records, titled Olof Dahlstrand Renderings, show that in 1960 one of his 11 rendering projects that year for architect John Paul Warnecke and Associates was Warnecke's Del Monte Shopping Complex, Monterey, which opened in 1967, seven years later. In 1964, Dahlstrand rendered four more drawings for Warnecke on the Del Monte project.³⁵ Dahlstrand began his design for the Carmel Valley Shopping Center a year later, in 1965, completed in 1966 and 1967, thus he would have been intimately familiar with the Warnecke design. The two projects are just nine miles apart.

The Del Monte Center was noted in *Architectural Record*, April 1968, for the sensitive siting and variety of its buildings against a carefully choreographed setting of trees and landscaping, designed by the internationally renowned landscape architects Lawrence Halprin and Associates, so quite a prestigious project.³⁶ It was also lauded for its natural materials of stone, masonry, concrete, and wood.



John Carl Warnecke & Associates, Monterey, 1967, with Lawrence Halprin, landscape architects, was Monterey's first major shopping center.
<http://architecturalroadtripvol2.blogspot.com/>

As noted in the Pebble Beach Historic Context section addressing commercial buildings, the Del Monte Center's broad roof overhangs, rustic look, and low-sloped hip and gable roofs "are a most common," characteristic of many commercial buildings in the area.³⁷ Such properties include the Lodge Annex, The

³⁵ John Carl Warnecke (1919 – 2010) was an award-winning architect with many notable buildings; as a student at Harvard he studied with Walter Gropius. While he considered himself a Modernist, he is known for his work as a "contextural" architect, meaning designs that fit into their surrounding environment as well as their cultural and historical setting. Warnecke became a Fellow of the AIA in 1962.

³⁶ A former employee of distinguished Modern landscape architect Thomas (Tommy) Church, the world-famous Halprin was a frequent collaborator of architect William Wurster. Halprin was inducted as a Fellow of the American Society of Landscape Architects, FASLA, in 1969.

³⁷ Page & Turnbull, Pebble Beach Historic Context Statement, Aug. 29, 2013, p. 129.

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Both Warnecke's and Dahlstrand's designs recall many such vernacular characteristics, as well as recalling seminal icons such as Julia Morgan's design of Asilomar, completed in 1913. Morgan's broad roofs, exposed stone, and big timber wood framing continue to be influences permeating the region's design sensibilities.

Arguably, the influences of such familiar buildings are as equally influential for local architects as the work of Frank Lloyd Wright, as proposed in the Page & Turnbull report. Wright's work, very different at different times in his long career, can said to have "influenced" thousands of architects. His legendary Wasmuth Portfolio of drawings, 1910-11, deeply "influenced" Richard Neutra and Rudolf Schindler, but their architecture looks very different to that of Wright's designs, as the "influence" was not in outer appearance but in the underlying philosophical potential of Wright's truly radical thinking. One didn't mimic Wright's forms but absorbed his lessons.

Dahlstrand, Warnecke, and their Shopping Centers

A closer look of the two shopping complexes, Del Monte and Carmel Valley / Mid Valley, suggest that the latter was largely based on the former. (The similarities between the two are also noted in Painter Preservation's report, with no conclusions drawn.³⁸) Both are suburban shopping centers predicated on the car and share some of the same features and design strategies, including a relaxed spatial layout of buildings, roof lines of low, hipped roofs of wood shake or facsimile shake, linear patterns, and articulated concrete supporting columns supporting broad overhangs to create sheltered pedestrian colonnades. In the Warnecke design, the elegant, faceted pillars are tapered, slender at the top and larger at the base. Dahlstrand's columns are stouter and rectangular (like the columns of the Lodge Annex, seen above), with surfaces combining exposed aggregate and colored concrete intaglio figuring similar to the engaged pilasters at his Wells Fargo Bank, Carmel-By-The-Sea, 1965.

The Painter Preservation report evaluated the property as a historic district. However, the convention of a historic district—one acknowledged by many planning departments in lead agencies as well as by architectural historians—is that a district includes several properties that may have been built by different architects at different times but that are connected by a theme. By contrast, the Mid Valley / Carmel Valley should be interpreted as a single property with several buildings, conceived by one architect as one complex, designed as a unified whole (with the possible exception of the gas station, discussed below), built at the same time, and opened on the same day, October 19, 1966.³⁹ Were the logic conceiving several structures on one property as a district consistent, most single-family properties with outbuildings and a garage or other built features would be considered to be historic districts. They are not. They are treated and evaluated as one property.

³⁸ Mid Valley Shopping Center Historic Resource Evaluation, /Phase I Assessment 9550 Carmel Valley Road, p. 49.

³⁹ *Carmel Valley Outlook*, Oct. 19, 1966, p. 14.

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The Standard Oiler

NEW STATION DESIGNS ENHANCE MARKETING OUTREACH



Mid Valley Shopping Center / Mid Valley Shopping Center, The Stanley Properties, 23
March 2021, Dr. Barbara Lamprecht

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from the sight, smell, and noise of vehicular traffic. The staggered locations of buildings, fountains, small landscapes, and seating areas animate the central “corridor,” providing many different opportunities to gather. The faceted, slender concrete columns supporting the broad overhangs are tapered, narrower at the top, allowing easier views into store interiors, which subtly enhances the shopping experience.



The Linda Vista Shopping Center, San Diego, 1943, is another example of progressive principles applied to a new building type, the (almost) postwar suburban shopping center. Designed by Case Study House architect Whitney Smith (1911 – 2002), the center of the horse-shoe shaped complex was set aside for pedestrian circulation with landscape, entertainment, water elements, and green lawns in biomorphic forms that were surrounded by a wide circular walkway protected by broad overhangs. The buildings were periodically separated with inviting pathways into the hub, each pathway with a slightly different character. Meanwhile, cars and loading vehicles could “flow unimpeded around the outskirts.”⁴³

⁴³ Debi Howell-Ardila, “The USC Connection: Origins and Context in the Work of Whitney R. Smith,” *Outside In: The Architecture of Smith and Williams*, Santa Barbara: Art, Design & Architecture Museum, University of California Santa Barbara and Getty Publications, pp. 94, 95.

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These two criteria are more challenging because they are vague. However, arguably these criteria are important because they seek to avoid the cumulative “death by a thousand cuts” that can compromise the unique individuality, history, and sense of place that make an area special. Thus, change is potentially more difficult if not impossible because many buildings, features, etc., might be argued to “materially benefit the historic character of the community,” quite a subjective endeavor. Likewise, if in place long enough, virtually any structure, tree, fence, sign, etc. can be said to be “an established and familiar visual feature.”

It should be noted here that while this report evaluates the Mid Valley / Carmel Valley Shopping Center as not meeting the requisite thresholds of Criterion C, the familiar structures and rooflines of the Center will remain as they have since 1967, and thus the continuity of place will be preserved.

This concludes this evaluation of the Mid Valley / Carmel Valley Shopping Center.

*Anthony Kirk, Ph.D.
420 Alberto Way, No. 13
Los Gatos, CA 95032
408-827-4959*

3 January 2020

Brandon Swanson
Interim RMA Chief of Planning
Monterey County Resource Management Agency
1441 Schilling Place
Salinas, CA 93901

Dear Mr. Swanson:

I should like to draw your attention to errors in the evaluation of the Carmel Valley Shopping Center prepared by the firm Page & Turnbull. Much of the writing, if not most of it, is presumably the work of Stacy Kozakavich, Ph.D. Although she identifies herself as a “Cultural Resources Planner/Archaeologist,” on the Page & Turnbull website, she does not mention that she was trained as an anthropologist/archaeologist in her cover letter of 18 November 2019 to you, which accompanies her Phase One Historic Assessment of the Carmel Valley Shopping Center. Dr. Kozakavich received an M.A. in “Anthropology (Archaeology)” in 1988 from the University of Saskatchewan and a Ph.D. in Anthropology in 2007 from the University of California, Berkeley. She states she is a Cultural Resources Planner in her letter to you, but identifies herself as a “Cultural Resources Planner / Historian” in her Memorandum commenting on my evaluation of the Carmel Valley Shopping Center. She was trained as an anthropologist, not as an architectural historian or as a historian, which may explain the presence of significant mistakes in her evaluation of what she erroneously calls the Mid Valley Shopping Center. Possibly she and the firm for which she works are under the impression that an archaeologist and a historian are the same. They are not.

Dr. Kozakavich fails to understand the character of the report I wrote evaluating the Carmel Valley Shopping Center. When a resource does not appear to be significant, the County of Monterey requires a “letter stating why the property is not historically significant, citing local, state, and federal criteria to support the finding,” according to the Guidelines for Historic Assessments, published on 2 March 2017. A letter report is required, rather than DPR 523 forms, in order to save the property owner money. If the Monterey County employee who reads the evaluation is of the opinion that necessary information is missing in the evaluation, he or she may obviously request additional information from the evaluator.

Dr. Kozakavich’s comments on how my evaluation might be improved would increase the cost considerably—probably by a factor of five to ten—if implemented and run

EXHIBIT D

contrary to the express purpose of the Guidelines for Historic Assessments. There are a variety of errors in Dr. Kozakavich's review comments, such as calling a segmental arch a barrel vault, which are not worth bringing to your attention. Three of her many observations, however, demand to be addressed. (I have, it should be noted, corrected those sections of my evaluation that were in error and submitted a revised report to you.) The roof of Block 1, according to Dr. Kozakavich, should be described as a hipped roof rather than a flat roof surrounded by shed roofs (Memorandum, page 2). A quick glance on Google Maps at the roof of Block 1 (or Figure 1 of the DPR 523A forms prepared by Page & Turnbull makes it evident that it is not a hipped roof, but a flat roof bordered by low-pitched shed roofs. Dr. Kozakavich states that when Block 2 was altered in 1981, "the expansion was relatively small compared to the original complex as a whole (Memorandum, page 2)." The original building comprised 2,275 square feet, the addition 8,697 square feet. Dr. Kozakavich may think that the addition of 8,697 square feet is "relatively small compared to the original complex" of 2,275 square feet. I do not. Finally, and perhaps most important, Dr. Kozakavich is of the opinion that, with regard to the shopping center as a whole, much of my discussion of the "building's architectural significance" (by which she presumably means "buildings's architectural significance" or, more handily, "architectural significance of the buildings") is in fact "an integrity analysis (Memorandum, page 3)." There is no analysis of integrity in my evaluation. I did not find the shopping center to be architecturally or historically significant, and as such there was no reason to consider the matter of integrity in a clear and systematic manner. No more than four or five sentences in my entire evaluation touch on alterations to the buildings.

I should also like to draw your attention to two obviously erroneous statements that appear in the DPR 523 forms prepared by Page & Turnbull. Block 1 is said to be a "one-and two-story commercial building." Safeway, which ostensibly is two stories in height, is in fact a single-story building, with a roughly 1,000 square-foot mezzanine at the back of the 20,832 square-foot store. Both the store and the mezzanine, which holds a lounge, restrooms, and a mechanical room, share a single ceiling. It is ludicrous to describe the building as two stories in height. Entrance to Mid Valley Storage is not on the west side of Block 3, as stated, but on the east side, off of Berwick Drive. The entrance and lobby of what was originally Valley Cinema, commanding nearly 800 square feet, is occupied by Skinovation. It should also be noted that the photograph that forms Figure 47 and Figure 36, which is an edited version of the former image, was not taken in 1971, but rather about 1966, as work on Block 2 had not yet begun.

At the heart of the Page & Turnbull evaluation of the Carmel Valley Shopping Center is the conclusion that the complex is eligible for National Register of Historic Places, the California Register of Historical Resources, and the Monterey County Local Official Register of Historic Resources. In my opinion, it is not eligible for listing in any of these three registers. Of the five blocks that make up the shopping center, Block 2 dates largely to 1981, when an 8,697 square-foot addition was made to a 2,275 square-foot building. Most of the block is less than fifty years old, and lacking any significance in

design, it is not eligible for listing in any of the registers. Block 5 was designed as a service station and is entirely conventional in appearance, without a single element of interest. Block 4, which originally was occupied by Crocker-Citizens National Bank, is of some interest, but it lacks the element that define Block 1 and Block 3: a low-pitched roof that extends far beyond the exterior walls of the structures composing the block and rests on concrete piers featuring exposed aggregate on three sides. This feature provides a covered walkway that shields pedestrians from the sun in the summer and rain in the winter.

Olof Dahlstrand is among the many architects mentioned in *Historic Context Statement: Carmel-by-the-Sea* (2008) (pages 45, 48, 105), where his first name is misspelled Olaf. The single work he designed that is mentioned is the Wells Fargo Bank building, a singularly handsome structure that is listed in the Carmel Inventory of Historic Resources. Dahlstrand ceased to work as an architect about 1993 and devoted the last two decades of his life to art and served, as well, on both the Carmel planning commission and the city council

The Page & Turnbull evaluation states that the “shopping center exemplifies Dahlstrand’s use of form and material in a Wrightian-inspired design that respects the features of its surrounding natural environment. Though an undoubtedly commercial complex, Frank Lloyd Wright’s influences can be seen in the use of naturalistic materials and dramatic roof lines echoing the surrounding hill slopes. Further, it is a unique example of the application of the architect’s work to a large suburban commercial complex, with integrated vehicle parking and circulation in addition to pedestrian walkways and courtyards (page 39).” The shopping center may indeed be a “unique example” of Olof Dahlstrand’s work, but there is nothing unique about either the parking lots, the walkways, or courtyard. The two sole characteristics that ostensibly make the shopping center eligible for the National Register, the California Register, and the Monterey County Register are “the use of naturalistic materials and dramatic roof lines.” The use of walks with roofs supported by concrete piers is a nice touch, but the walks do not define the architecture of the shopping center. Dr. Kozakavich may find the roof lines dramatic, but the *Monterey Herald*, on 13 July 1966, reported that the developers of the Carmel Valley Shopping Center desired “that the architectural design and structural excellence of the project reflect the characteristic warm color and horizontal flow of the valley terrain.”

Block 2 is said to have been built in two stages, the first in 1977, the second in 1982 (page 39). Block 2 was constructed in three stages: 1967, 1981 and 1982. Roughly two-thirds of the building dates to 1982. Few of its features relate to the elements of Block 1 or Block 3, except for significant roof overhang. Block 4 is a handsome building, but the overhanging roof is not supported by concrete piers, as the roofs of Block 1 and Block 3 are. The design of Block 5 is conventional in every regard. Block 1 and Block 3 are of some interest, but their design does not, in my opinion, raise the shopping center to a level of architectural significance that would allow the complex of buildings to be placed

in any of the registers, national, state, or local. Finally, in my opinion, the Carmel Valley Shopping Center is not a “Wrightian-inspired design.” Wright was a master architect, possibly the most important and celebrated of all American architects. He designed a single shopping center over the course of his lifetime, the Anderton Court Shops, a small three-story complex that is on the National Register of Historic Places (figure 1).



Figure 1. Frank Lloyd Wright, Anderton Court Shops, Rodeo Drive, Beverly Hills, California. The small shopping center opened in 1952 and was added to the National Register of Historic Places in 2004.

Originally the center held four shops and a penthouse, with a spiral ramp that led from the ground level to the top. The building has the grace and panache of design that is completely absent in the Carmel Valley Shopping Center.

It is nothing short of astounding that a nomination spread over forty-two pages makes no mention of the significant alteration to two of the storefronts in Block 1, nor does it mention the work that transformed the entry and lobby of the Valley Theater into a shop occupying nearly 800 square feet, Skinovation. The transformation of the space, at the front of the block, enclosed an entry lined with movie posters and radically altered the terminus of the cross gable. These alterations have led to a loss of original materials, workmanship, and feeling.

In my opinion the Carmel Valley Shopping Center is not eligible for the National Register of Historic Places, the California Register of Historical Resources, or the Monterey County Local Register of Historical Resources.

Sincerely yours,



Anthony Kirk, Ph.D.

Anthony Kirk, Ph.D.
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831-818-2929

14 December 2021

Dale Ellis
Anthony Lombardo & Associates, Inc.
144 E. Gabilan Street
Salinas, CA 93901

Dear Mr. Ellis:

I have carefully read the Mid-Valley Shopping Center Design Approval Draft EIR. It has not altered my original opinion of the Carmel Valley Shopping Center, which, as you recall, is that it does not meet the criteria for inclusion in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or the Monterey County Local Register of Historical Resources under Criteria A5, C1, or C2. The Draft EIR appears to have been assembled in haste and is flawed by the absence of two critical documents, as well as reliance for much of the information it contains on the report written by Page & Turnbull, dated 11 November 2019. The documents that are missing from the Draft EIR comprise the following:

1. My letter to Brandon Swanson, Interim RMA Chief of Planning for the Monterey County Resource Management Agency, dated 3 January 2020. In this letter I bring attention to several errors made by Stacy Kozakavich, Ph.D., makes in her evaluation of the five buildings, termed “blocks” in her report, that comprise the Carmel Valley Shopping Center, the correct name of what the EIR erroneously calls the Mid-Valley Shopping Center.¹ She failed, most notably, to mention the transformation of the Valley

1. The drawings produced by Olof Dahlstrand, architect of the shopping center, almost invariably use the title Carmel Valley Shopping Center, although a few are titled Mid-Valley Shopping Center. The Olof Dahlstrand Collection in the College of Environmental Design, University of California, Berkeley, references the Carmel Valley Shopping Center as the proper name. News stories on the shopping center typically use the term Carmel Valley Shopping Center, as may be seen in *Carmel Valley Outlook* for 19 October 1966, the *Monterey Herald* for 13 July 1966, 23 August 1966, and 8 May 1967. The confusion between the two names undoubtedly arose because the developers of the Carmel Valley Shopping Center had chosen the name Mid Valley Associates for themselves.

EXHIBIT E

Theater, which became Mid Valley Self Storage and the shop Skinovation, in her evaluation of the integrity of the Shopping Center. The extensive alterations to the Valley Theater led to numerous changes in the design of Building 3, as well as to the loss of original materials, workmanship, and feeling, four of the seven aspects of integrity, according to National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation* ([Washington, D.C], 2002).

Parenthetically, I also noted in my letter that Building 1, or Block 1, is said on page 2 of Dr. Kozakavich's evaluation to be a "one- and two-story commercial building." Safeway, which is ostensibly two stories in height, is actually a single story in height, with a roughly 1,000-square-foot mezzanine at the rear of a 20,382-square foot store. Both the store and the mezzanine share a single ceiling. The entrance to Mid Valley Storage is not west side of Block 3, as stated, but on the east side, off Berwick Drive. The entrance and lobby of what was originally Valley Cinema, containing 800 square feet, was until relatively recently occupied by Skinovation. I also stated that the photographs forming Figure 36 and Figure 47 were not taken in 1971 as stated, but rather about 1966, as work on Block 2 had not yet begun.

2. Equally important is the absence of the Letter of Memorandum by Barbara Lamprecht, M.Arch. Ph.D., to Brandon Swanson, dated April 2021. This letter is both far-ranging and unusually perceptive in its discussion of the architect who designed the Carmel Valley Shopping Center, Olof Dahlstrand. It notes that Dahlstrand is not mentioned in the *Pebble Beach Historic Context Statement*, prepared in 2013 by Page & Turnbull for Monterey County Parks (Pebble Beach is adjacent to both Monterey and Carmel, lying between these two cities, and the Context Statement includes a selective discussion of these communities). Dr. Lamprecht concludes her twenty-seven-page evaluation by stating that the Carmel Valley Shopping Center does not meet the criteria for significance under Criterion C: it does not "embody the distinctive of a type, period, or method of construction," it does not "represent the work of a master," and does not possess "high artistic value." In other words, it fails to meet any of the criteria for designation and is not significant as an architectural expression of Olof Dahlstrand's work.
3. Because there is no mention of my letter to Brandon Swanson, dated 3 January 2020, nor Barbara Lamprecht's letter to Mr. Swanson, dated April

2021, Monterey County did not address the significant points in the two letters.

4. Among the significant points in my letter are the following:
 - (a) Dr. Kozakavich was trained as an Anthropologist, not as a Historian. Both I and Dr. Lamprecht are “qualified architectural historians,” meeting the National Park Service’s requirements as stated in the Code of Federal Regulations (CFR), Title 36, Part 6. Such qualifications are required to evaluate potential historic resources under the California Environmental Quality Act (CEQA). Dr. Kozakavich’s name does not appear on the Monterey County list of Qualified Historian and Architectural Historian Consultants, updated on 29 June 2020.
 - (b) Dr. Kozakavich failed to understand the character of my evaluation of the shopping center, stating in Appendix C of her 11 October 2019 evaluation, that my letter to the owner, Russell Stanley, lacked footnotes, bibliographic references, research repositories, a map or aerial photograph of the property, and countless other documentation. When a property is evaluated and found not to be historic, Monterey County requires only a letter report, “stating why the property is not Historically significant, citing local, state, and federal criteria to support the finding.” A letter report is required rather than DPR forms in order to save the client funds. If the Monterey County employee who reads the evaluation believes that necessary information is missing in the evaluation, he or she may request it.
 - (c) A variety of errors populate Dr. Kozakavich’s commentary on my evaluation, stating, for example, on page 2 that the roof on Building A, or Building 1 (beginning with the building where Safeway is located and proceeding counterclockwise around the shopping center) is crowned with a hipped roof rather than a flat roof bordered by low-pitched shed roofs. Had she bothered to look at the roof on Google Maps, she would have seen that the roof is flat, with a border of shed roofs.
 - (d) She subsequently states on page 2 that the shopping center was developed by “Porter-Marquard Realty.” Although I did not mention it in my letter, the shopping center was in fact developed by Mid

Valley Associates, formed by George Clemens, Paul E. Porter, and Norman J. Craft, not Porter-Marquand Realty.

- (e) She declares as well on page 2 that when Block 2 was enlarged in 1977, it was not as I stated, “nearly four times the size of the original structure,” but “was relatively small compared to the original complex as a whole.” The addition added 8,697 square feet to what had formerly comprised 2,275 square feet. In my opinion the addition was hardly “relatively small.”
- (f) Finally, she states on page 3 much of my evaluation of the “building’s architectural significance” is “an integrity analysis.” There is no evaluation of integrity in my letter. I did not find the shopping center to be architecturally or historically significant, and as such there was no reason to consider integrity. No more than four or five sentences touch on alterations to the buildings.

In April 2021 Barbara Lamprecht, M. Arch., Ph.D., wrote a letter to Brandon Swanson, Interim RMA Chief of Planning for the Monterey County Resource Management Agency. The letter made a number of points relating to the Carmel Valley Shopping Center and the architect, Olof Dahlstrand, who designed it. Among the significant points are the following:

- (a) The evaluations prepared by the firms Page & Turnbull and by Painter Preservation state that the shopping center is significant because it was designed by a master architect. While there is no doubt no doubt that he was an able and conscientious architect, there is no evidence that Olof Dahlstrand was a master architect. Among the evidence to support this supposition are the following facts: Dahlstrand does not appear in the Pacific Coast Architecture Data Base; his name is not listed in the AIA’s American Architects Directory; he wrote no books on architecture; he does not appear in Page & Turnbull’s, *Pebble Beach Historic Context Statement* (San Francisco, 2013); while he is mentioned on three occasions in Pierluigi Serraino’s *NorCalMod: Icons of Northern California Modernism* (San Francisco, 2006), the text includes no photographs of his work, no mention of his contribution to modern architecture, and no pictorial biography at the end of the volume. “Olof Dahlstrand does not meet the criteria for being a master [architect],” as Dr. Lamprecht states on page 10 of her letter to Brandon Swanson.

- (b) Dahlstrand was highly skilled as a renderer, and other architects regularly retained him to produce drawing. In the course of slightly more than thirty years, he worked on approximately twenty commercial projects, as Dr. Lamprecht writes.
- (c) Page & Turnbull state that Dahlstrand's first shopping center in the Carmel area was in Carmel itself. Dr. Lamprecht, however, on page 11 of her letter, provides a more complex history of the shopping center.
- (d) Dr. Lamprecht argues that Carmel Valley Shopping Center was based on the Del Monte Shopping Center, designed by John Carl Warnecke. Dahlstrand's earliest drawings for the latter center date to 1960, six years before work on the Carmel Valley Shopping Center was begun. As she writes on page 22, a close examination of the Del Monte Shopping Center suggests it was used as a model for the Carmel Valley Shopping Center, with the two centers "share some of the same features and design strategies."
- (e) Dr. Lamprecht refutes the idea that the Center is a historic district, which is commonly interpreted as a group of buildings that may be constructed at different times by varied persons but are all related by a common theme. By contrast, Dr. Lamprecht argues that the Carmel Valley Shopping Center is a single property with multiple buildings designed by one person, at one time, as a holistic design.
- (f) Comprehensively, as Dr. Lamprecht concludes on page 26, the Carmel Valley Shopping Center "is not particularly 'Modern' in expression but rather takes its cue from other local and prevalent styles." In other words, Dahlstrand's design fits in well with long established design paradigms well known in Carmel: rustic, low slung, hipped roofs, generous overhangs, and natural materials and colors. It does not 'represent a significant and distinguishable entity [i.e., a historic district] whose components may lack individual distinction.'"

As I stated at the outset of this letter, the Carmel Valley Shopping Center does not appear to be eligible for listing in the National Register of Historic Places under Criterion C, the California Register of Historical Resources under Criterion 3, or

Monterey County Local Register of Historical Resources under Criteria A5, C2.
Dr. Lamprecht concurs with me.

Sincerely yours,

A handwritten signature in blue ink that reads "Anthony Kirk". The signature is written in a cursive style with a large, looped initial "A".

Anthony Kirk, Ph.D.

Anthony Kirk, Ph.D.
2644 State Street, No. 22
Santa Barbara, CA 93105
831-818-2929

24 December 2021

Russel W. Stanley
The Stanley Group
2275 Winchester Boulevard
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Dear Mr. Stanley:

Olof Dahlstrand, who designed most if not all of the Carmel Valley Shopping Center, was not a master architect. Before beginning his architectural training at Cornell University in New York, he visited Taliesin, where he was impressed by the work of Frank Lloyd Wright. Following graduation in 1939, he practiced briefly in Wisconsin, then moved to San Francisco, where he served as an associate for the modernist architects Fred and Lois Langhorst. He became responsible for their practice when they took up residence in Europe. Much of Dahlstrand's work reflected the influence of Wright, although his houses were not directly derivative of Wright's architecture. In the 1950s he designed a number of Usonian houses in the San Francisco East Bay, following a design concept pioneered by Wright. Decades later a self-published book by one of the homeowners, William Welty, *Olof Dahlstrand: The Usonians, the Magnificent Seven of the East Bay* (San Francisco, 2007), featured Dahlstrand's work. None of his designs rose to a level comparable to Wrights. In 1958 Dahlstrand moved to Carmel, where he worked on a variety of projects, including the design of banks, educational buildings, shopping centers, and office buildings.

Stacy Kozakavich, Ph.D., takes the position in her evaluation of the Carmel Valley Shopping Center (what she calls the Mid Valley Shopping Center) that it is significant under Criterion C of the National Register of Historic Places and Criterion 3 of the California Register of Historical Resources "for its association with locally prominent architect, Olof Dahlstrand."¹ Although Dr. Kozakavich does not use the word "master" in connection with Dahlstrand, it is readily evident that this is the section of Criterion C/3 under which she finds the resource significant.

"A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the

1. Page & Turnbull, Inc., DPR 523L, Mid-Valley Shopping Center, 39.

development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft," according to National Register Bulletin 15.²

Dr. Kozakavich fails, however, to produce evidence that Dahlstrand was indeed a master, citing a single mention in the 27 April 1962 *Eureka Humboldt Standard* to a proposed project by the "noted architect."³ While many architects may be described as notable, prominent, or successful, such a description does not make them a "Master." Dahlstrand was successful in his design work, but he did not rise to the prominence of a master, even at the local level. He is among the many architects mentioned in the Carmel *Historic Context Statement*, where his name appears as Olaf Dalhstrand on one page and Olaf Dahlstrand on another. His biographical statement contains two sentences, far less than appears under the names of truly prominent Carmel architects. The single work he designed that is mentioned in the Context Statement is the Wells Fargo Bank building, constructed in 1965.⁴ Kent Seavey, the author of the DPR nominating the structure to the Carmel Inventory of Historic Resources, calls it "an excellent example of the Wrightian Organic Style of architecture." Although nominated in 2016, the building has yet to be placed in the inventory. Dahlstrand ceased to work as an architect about 1993 and devoted the last two decades of his life to art, serving, as well, on both the Carmel planning commission and the city council.

Dr. Diana Painter, proprietor of the Santa Rosa, California, firm Painter Preservation, echoes what Dr. Kozakavich has to say in her evaluation of the shopping center, dated 24 November 2020. In a letter to Ms. Terri Wissler Adam of the EMC Planning Group, dated 21 December 2020, Dr. Painter wrote that she obtained information on Olof Dahlstrand from Pierluigi Serraino. In an email to Dr. Painter, Serraino, wrote, "Only architects who were principles [*sic*] (in the area of modern design) gave us worthy structures. And Olof was unquestionably of them. That I am certain of beyond reasonable doubt."⁵ Leaving aside the nearly incoherent character of what Serraino wrote, he mentions Dahlstrand on just three occasions in his book *NorCalMod: Icons of Northern California Modernism* (San Francisco, 2006). He states that Daahlstrand was not a native Californian, that he spoke on at least one occasion of the shortage of wood after WWII, and that he provided information on the importance of the "Bay Region Style." The "Bay Region Style" was, of course, not a style, lasting as it did from the 1890s through the 1960s or 1970s, but rather what two towering figures of California architectural history, David Gebhard and Harold Kirker called the "Bay Area Tradition."

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2. National Park Service, National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, rev. ed. ([Washington D.C.], 1995), 20.
 3. Page & Turnbull, Inc., DPR 523L, Mid-Valley Shopping Center, 37.
 4. *Historic Context Statement: Carmel-by-the-Sea*, prepared for the City of Carmel-by-the Sea by Teresa Grimes and Leslie Heumann and updated by Architectural Resources Group, ([San Francisco, 2008]), 45, 48, 105.
 5. Quoted in Diana Painter to Terri Wissler Adam, EMC Planning Group, 21 December 2020, EMC Planning Group.

In his book Serraino does not mention a single structure nor provide a single photograph of a building designed by Dahlstrand. Dr. Painter states that the architect was prolific and “able to attract prize commissions,” yet she names only three buildings designed by him over the course of a quarter century.⁶

Other sources make it evident that Olof Dahlstrand was not considered a master architect. He was never named a Fellow of the American Institute of Architects, an honor accorded designers “who have made outstanding contributions to the profession through design excellence, contributions in the field of architectural education, or to the advancement of the profession.”⁷ He is not among the 8,400 architects listed in the Pacific Coast Architecture Database, which includes designers in California, Oregon, and Washington.⁸ No examples of his work are included in the National Register of Historic Places, nor is he mentioned in *Architectural Record*. Although a competent architect, Olof Dahlstrand was clearly not a master. When he died at the advanced age of 97 on 17 July 2014, his obituary in the *Monterey County Herald* called him “a talented architect and artist,” devoting a single sentence to his work as an architect and a single sentence to his work as an artist. Nonetheless, Dr. Kozakavich considers him a master, though she is unable to provide any meaningful evidence to support her assertion.

If Olof Dahlstrand were a master architect, the Carmel Valley Shopping Center would need to express “a particular phase in the development of the master’s career, an aspect of his or her work, or a particular idea or theme in his or her craft,” according to National Register Bulletin 15.⁹ Both Dr. Kozakavich and Dr. Painter believe that the Carmel Valley Shopping Center is significant for its design. Dr. Painter states in her letter to Terri Wissler Adam that it is “the first shopping center in the Carmel Valley to exhibit a cohesive, comprehensive modern architectural expression.” “It is also,” she writes, “the only shopping center designed in the Organic style, one of the hallmark styles in Carmel-by-the-Sea and Carmel Valley. . . .”¹⁰

Organic architecture, according to Cyril M. Harris, compiler of the encyclopedic *Dictionary of Architecture and Construction*, is “established in accordance with processes of nature rather than based on an imposed design.” Organic architecture emerged from the design philosophy of Frank Lloyd Wright, who believed that “a building (and its appearance) should follow forms that are in harmony with its natural environment. The materials used on the exterior should be sympathetic to the buildings locale, thereby relating the building to its setting, as if it were the result of natural growth.” Organic

6. Painter to Adam, 21 December 2020, EMC Planning Group.

7. “Fellow of the American Institute of Architects,” Wikipedia, https://en.wikipedia.org/wiki/Fellow_of_the_American_Institute_of_Architects, accessed 1 November 2020.

8. <http://pcad.lib.washington.edu/persons/?page=7>, accessed 1 November 2020.

9. National Park Service, National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, rev. ed. ([Washington D.C.], 1995), 20

10. Painter to Adam, 21 December 2020, EMC Planning Group.

architecture typically made use of low-pitched overhanging roofs.¹¹ There are indeed touches of Organic architecture in the shopping center, but parts of it, such as the Carmel Valley Auto Service, at the corner of Carmel Valley Road and Dorris Drive, are entirely conventional in appearance (figure 1).



1. Looking northeast at south side of Carmel Valley Auto Service, 19 August 2019. Photograph by Anthony Kirk, Ph.D.

According to Virginia Savage McAlester, author of the preeminent guide to American houses, "Organic architecture is based on the coalescence of the built environment with nature, allowing the design to respond to the natural environment rather than impose on it. While other modern movements more often championed straight lines and orthogonal designs, Organic modernism favored natural shapes and interesting geometries." As is evident from the illustrations in her book, Organic architecture in house design expressed itself in a fundamentally different way than in the Carmel Valley Shopping Center, which is a composition of "straight lines and orthogonal designs."¹²

11. Cyril M. Harris, ed., *Dictionary of Architecture and Construction*, 4th ed. (New York, 2006), 685.

12. Virginia Savage McAlester, *A Field Guide to American Houses*, rev. and expanded (New York, 2013), 658. Illustrations of Organic houses are found on pp. 656-59.

In her evaluation of the Carmel Valley Shopping Center, Dr. Kozakavich states that it “was built in a modern style influenced by the work of Frank Lloyd Wright.” Wright, to my knowledge, designed a single small shopping center, which is located on Rodeo Drive in Beverly Hills. Called the Anderton Court Shops, it originally contained four shops and a penthouse that were reached from an angular ramp that rose three stories in height (figure 2). It is clearly a masterpiece of design, while the Carmel Valley Shopping Center is not.

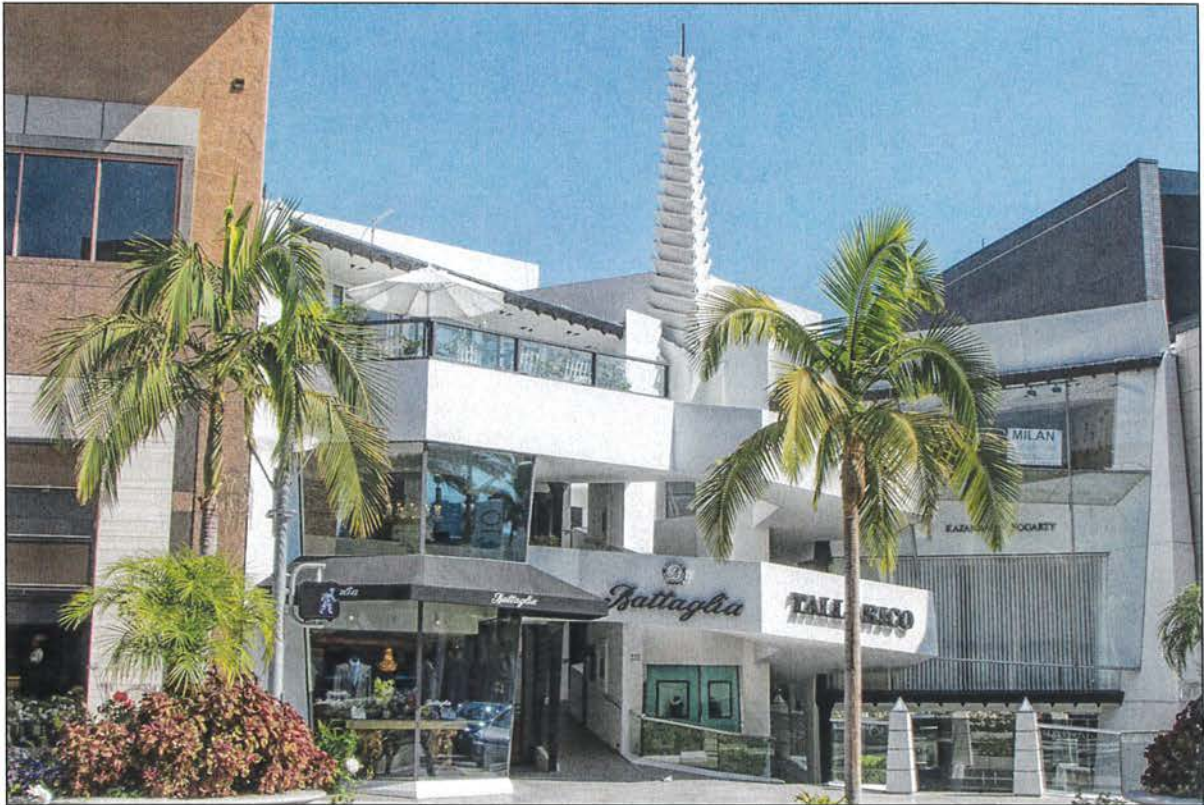


Figure 2. Anderton Court, Beverly Hills, designed in 1952 by Frank Lloyd Wright. Photograph by Anthony Kirk, Ph.D.

Olof Dahlstrand was not a master architect. He was a competent and able architect, best known for his design of the Wells Fargo building in Carmel. Some of his work, such as the design of seven Usonian houses east of San Francisco reflected Wright’s work, though it did not rise to the level of this internationally famous architect. Dr. Kozakavich, who takes the position that he was a master, found no evidence that he was, only a single newspaper article, from Eureka, California, that called him a “noted

architect.” He is mentioned only in passing in the *Historic Context Statement: Carmel-by-the-Sea*, which devotes substantially more space to other local architects. The architectural historian Pierluigi Serraino mentioned him briefly on three occasions, misspelling his first name, and provided no illustration of his work in his 288-page book, *NorCalMod: Icons of Northern California Modernism*. He was never named a Fellow of the American Institute of Architects. His name does not appear in the comprehensive Pacific Coast Architecture Database, which lists 8,400 architects. Although the Carmel Valley Shopping Center may be considered an expression of Organic architecture, it is clearly not a good example of the style. Dahlstrand retired early, devoting the last thirty years of his life to art and public service. To date, no evidence has appeared that suggests he was a master architect.

Sincerely yours,



Anthony Kirk, Ph.D

Attachment D

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DEMOLITION KEY NOTES

THE KEY NOTES THAT FOLLOW APPLY TO THE DRAWING(S) ON THIS SHEET ONLY. REFER TO FOLLOWING SHEETS FOR NOTES THAT ARE APPLICABLE TO THOSE DRAWINGS.

- D1 CONTRACTOR SHALL REMOVE AND LEGALLY DISPOSE OF EXISTING CONCRETE CURB, GUTTER AND WALKWAY. - TYPICAL AS SHOWN
D2 CONTRACTOR SHALL REMOVE AND LEGALLY DISPOSE OF EXISTING AC PAVING INCLUDING BUT NOT LIMITED TO AC PAVING, WHEEL STOPS (WHERE OCCUR), AND AGGREGATE BASE. - TYPICAL AS SHOWN
D3 CONTRACTOR SHALL REMOVE EXISTING 4" WIDE PAINTED STALL STRIPING AS REQUIRED TO ACCOMMODATE NEW WORK - TYPICAL AS SHOWN
D4 CONTRACTOR SHALL REMOVE AND LEGALLY DISPOSE OF EXISTING BREEZEWAY AS REQUIRED TO ACCOMMODATE NEW WORK - TYPICAL AS SHOWN
D5 CONTRACTOR SHALL REMOVE AND LEGALLY DISPOSE OF EXISTING LANDSCAPE PLANTER AS REQUIRED TO ACCOMMODATE NEW WORK - TYPICAL AS SHOWN
D6 CONTRACTOR SHALL REMOVE AND LEGALLY DISPOSE OF EXISTING CONCRETE FLATWORK AS REQUIRED TO ACCOMMODATE NEW WORK - TYPICAL AS SHOWN

WR&D WALD RUHNKE & DOST ARCHITECTS LLP 2340 GARDEN ROAD, SUITE 100 MONTEREY, CALIFORNIA 93940 PHONE: 831.649.4642 FAX: 831.649.3530 WWW.WRDARCH.COM

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DORRIS DRIVE

BUILDING 'E' SERVICE STATION

BUILDING 'D' ACE HARDWARE

BUILDING 'A'

BUILDING 'C'

BUILDING 'B'

BERWICK DRIVE

KEY NOTES

THE KEY NOTES THAT FOLLOW APPLY TO THE DRAWING(S) ON THIS SHEET ONLY. REFER TO FOLLOWING SHEETS FOR NOTES THAT ARE APPLICABLE TO THOSE DRAWINGS.

- 1 EXISTING 4" WIDE PAINTED STALL STRIPING.
2 EXISTING AC PAVED PARKING LOT AND/OR DRIVEWAY TO REMAIN INTACT. NO WORK U.O.N. PROTECT FROM DAMAGE.
3 EXISTING LANDSCAPING AND IRRIGATION.
4 EXISTING DRIVEWAY APPROACH TO REMAIN. CONTRACTOR TO PROTECT FROM DAMAGE.
5 INDICATES EXISTING TRASH / RECYCLE ENCLOSURE.
6 EXISTING CURB, GUTTER & SIDEWALK TO REMAIN. REPAIR AND REPLACE CURB / GUTTER / SIDEWALK AS REQUIRED TO ACCOMMODATE NEW WORK.
7 INDICATES PROPERTY LINE.
8 EXISTING COUNTY MAINTAINED ASPHALT ROAD TO REMAIN INTACT. NO WORK U.O.N. PROTECT FROM DAMAGE.

DEMOLITION GENERAL NOTES

- 1. THE CONTRACTOR SHALL VISIT THE PROJECT SITE PRIOR TO BIDDING TO DETERMINE THE EXACT EXTENT OF ALL SITE DEMOLITION ITEMS.
2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE VERIFICATION OF ALL EXISTING UTILITIES IN THE FIELD PRIOR TO WORK. LOCATIONS SHOWN ON THE PLANS ARE APPROXIMATE AND FOR GENERAL INFORMATION ONLY.
3. ALL WORK SHALL BE DONE IN ACCORDANCE WITH THE STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION STANDARD SPECIFICATIONS, THE PROJECT SPECIFICATIONS AND ANY APPLICABLE STANDARD DETAILS FOR THE PROJECT.
4. THE CONTRACTOR SHALL PERFORM ALL CLEARING, DEMOLITION, REMOVAL OF OBSTRUCTIONS AND SITE PREPARATIONS NECESSARY FOR THE PROPER EXECUTION OF ALL WORK SHOWN ON THESE PLANS.
5. THE CONTRACTOR SHALL NOTIFY UNDERGROUND SERVICE ALERT (U.S.A.) AT LEAST 48 HOURS PRIOR TO ANY EXCAVATION ON THIS PROJECT (800-227-2600). THE CONTRACTOR SHALL REMOVE ALL U.S.A. MARKINGS AS SOON AS THEY ARE NO LONGER NEEDED, BY USING A HIGH PRESSURE WATER METHOD ONLY.
6. THE CONTRACTOR SHALL BE RESPONSIBLE UNDER THIS CONTRACT FOR REPAIRING AND REPLACING AT CONTRACTOR EXPENSE, ANY STRUCTURES, FENCES, WALLS, OR PLANT LIFE DAMAGED OR DESTROYED BY THE OPERATIONS. LIKEWISE, THE CONTRACTOR SHALL BE RESPONSIBLE FOR REPAIRING OR REPLACING ANY AND ALL DAMAGES OCCURRING BY THE OPERATIONS ON ADJACENT PROPERTIES AND ANYWHERE OUTSIDE THE CONTRACT LIMIT LINES. THE DAMAGED ITEMS WILL BE RESTORED TO THEIR ORIGINAL CONDITION AND TO THE SATISFACTION OF THE ARCHITECT AND ENGINEER.
7. KEEP ALL PLANTING, PAVING AND CURB AREAS FREE FROM DEBRIS AND TRASH DURING THE ENTIRE DURATION OF THE CONTRACT.
8. CARE SHOULD BE TAKEN WITH EXISTING TREES TO REMAIN. GRADES WITHIN THE DRIP LINE OF THE TREE SHALL NOT BE CHANGED UNLESS OTHERWISE SPECIFIED ON THE PLANS. UNNECESSARY COMPACTION OF THE AREA WITHIN THE DRIP LINE SHALL BE AVOIDED. SEE LANDSCAPE PLANS FOR ADDITIONAL NOTATION.
9. ALL ITEMS INDICATED TO BE REMOVED SHALL BE DISPOSED OF FROM THE PROJECT SITE, EXCEPT ITEMS INDICATED TO BE SALVAGED.
10. UNDERGROUND UTILITIES WITHIN THE LIMITS OF DEMOLITION SHALL BE CAPPED AND ABANDONED OR REMOVED AS REQUIRED, UNLESS SHOWN OTHERWISE. SEE UTILITY PLANS FOR FURTHER DETAILS.
11. DEMOLITION WORK SHALL BE DONE IN ACCORDANCE WITH THE RECOMMENDATIONS IN THE GEOTECHNICAL REPORT.

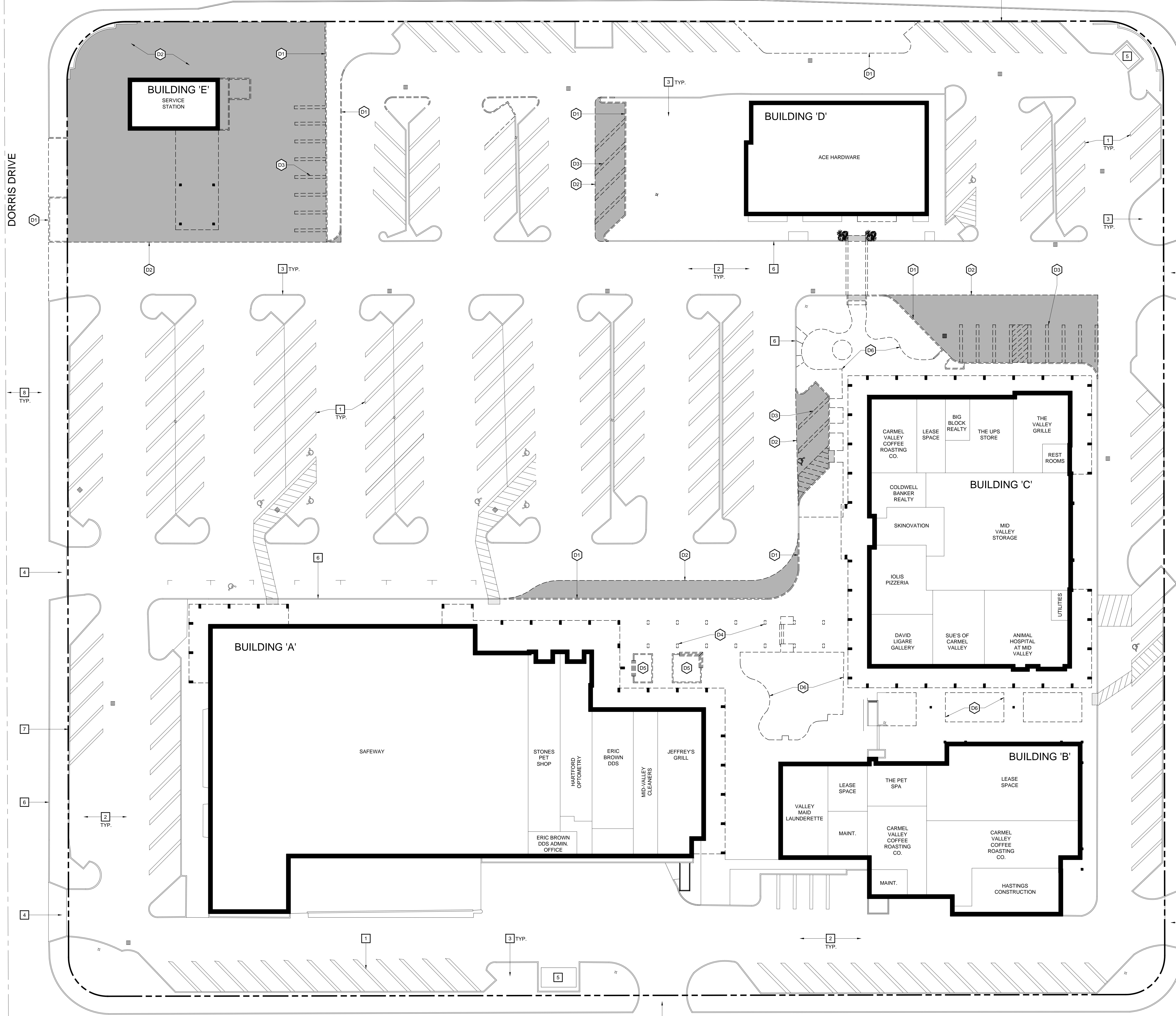
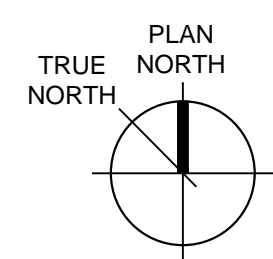
THE MARKETPLACE AT CARMEL VALLEY RENOVATION THE MARKETPLACE AT CARMEL VALLEY 9550 CARMEL VALLEY ROAD CARMEL VALLEY, CA 93923

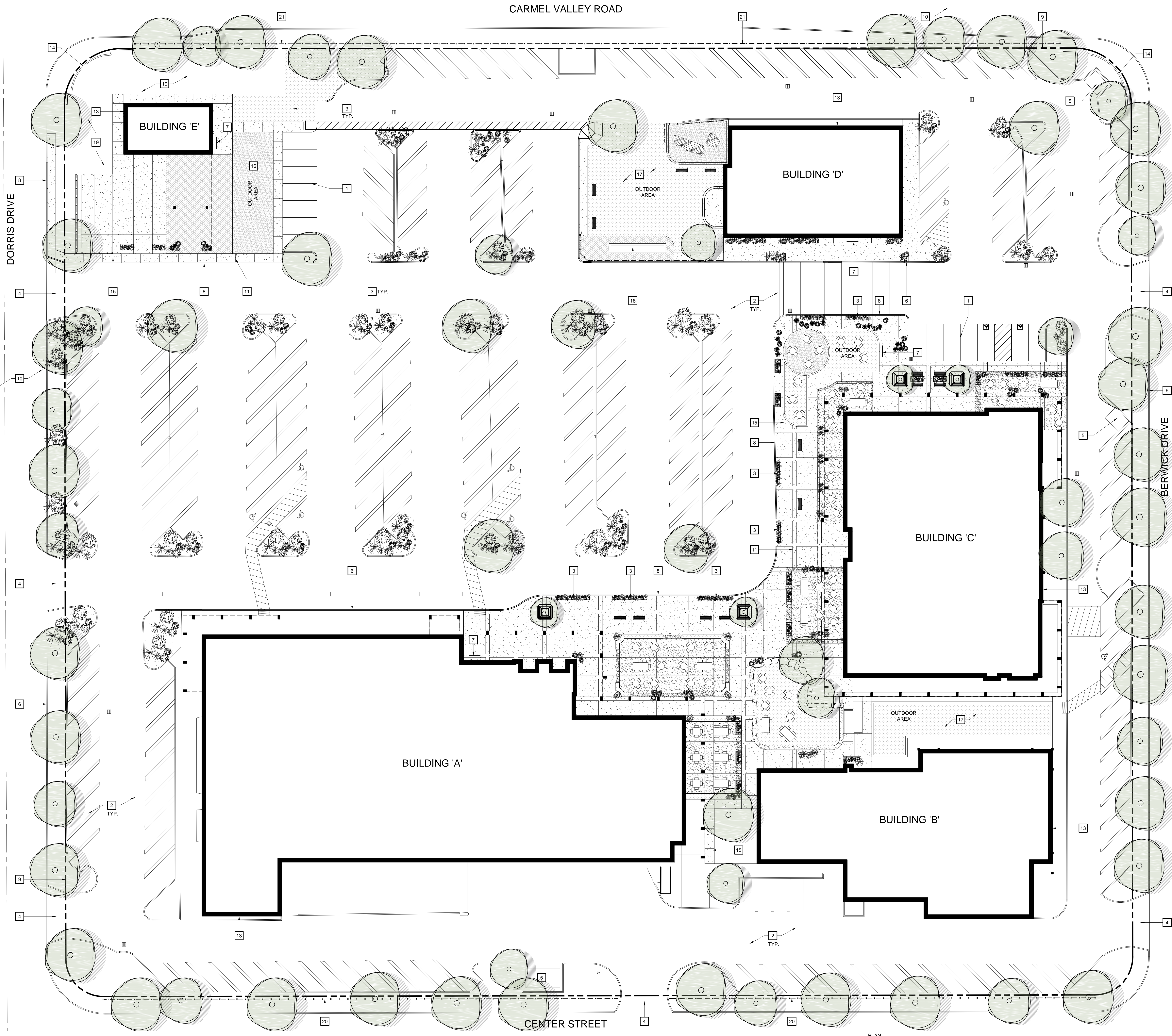
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SHEET NAME: OVERALL DEMOLITION SITE PLAN SHEET NO.: D100 FILE NAME: 18011-D100

OVERALL DEMOLITION SITE PLAN

SCALE: 1" = 20'-0"





KEY NOTES

- THE KEY NOTES THAT FOLLOW APPLY TO THE DRAWING(S) ON THIS SHEET ONLY. REFER TO FOLLOWING SHEETS FOR NOTES THAT ARE APPLICABLE TO THOSE DRAWINGS.
- 1 4" WIDE PAINTED STALL STRIPING PER COUNTY STANDARDS.
 - 2 EXISTING AC PAVED PARKING LOT AND/OR DRIVEWAY TO REMAIN INTACT. NO WORK U.O.N. PROTECT FROM DAMAGE.
 - 3 INDICATES LANDSCAPING AND IRRIGATION. SEE LANDSCAPE DRAWINGS FOR ADDITIONAL REQUIREMENTS.
 - 4 INDICATES EXISTING DRIVEWAY APPROACH TO REMAIN. CONTRACTOR TO PROTECT FROM DAMAGE.
 - 5 INDICATES EXISTING TRASH / RECYCLE ENCLOSURE.
 - 6 EXISTING CURB, GUTTER & SIDEWALK TO REMAIN. REPAIR AND REPLACE CURB / GUTTER / SIDEWALK AS REQUIRED TO ACCOMMODATE NEW WORK.
 - 7 INDICATES LOCATION OF METAL TUBE BIKE RACK.
 - 8 PROVIDE 6" HIGH CONCRETE CURB TYPICAL AS SHOWN.
 - 9 INDICATES PROPERTY LINE.
 - 10 EXISTING COUNTY MAINTAINED ASPHALT ROAD TO REMAIN INTACT. NO WORK U.O.N. PROTECT FROM DAMAGE.
 - 11 INDICATES CONCRETE CONTROL OR EXPANSION JOINTS AT CONCRETE WALKWAY.
 - 12 PROVIDE INTERNATIONAL SYMBOL OF ACCESSIBILITY.
 - 13 EXISTING BUILDING FOOTPRINT. PROTECT FROM DAMAGE.
 - 14 INDICATES LOCATION OF MONUMENT SIGN - DEFERRED SUBMITTAL.
 - 15 PROVIDE CONCRETE WALKWAY WITH SLIP RESISTANT FINISH (MEDIUM SALT FINISH, TYP.) CONCRETE WALK TO BE A MIN. 4'-0" WIDE. PROVIDE POSITIVE SLOPE AWAY FROM BUILDING WHERE APPLICABLE.
 - 16 INDICATES DECOMPOSED GRANITE.
 - 17 INDICATES OPEN LAWN AREA FOR OUTDOOR ACTIVITIES.
 - 18 'MY HEART' CARMEL VALLEY SCULPTURE.
 - 19 VINEYARD AREA
 - 20 4'-0" HIGH WOOD SCREEN WALL.
 - 21 RANCH STYLE WOOD FENCE.

50

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THE MARKETPLACE AT CARMEL VALLEY RENOVATION

THE MARKETPLACE AT CARMEL VALLEY
9550 CARMEL VALLEY ROAD
CARMEL VALLEY, CA 93923

A.P.N. NO.: 169-234-007, 169-234-008

JOB NO.
18011

PRINT DATE:
11.14.2019

DRAWN BY: JTI

CHECKED BY: SC

SET ISSUED:

PARKING REQUIREMENTS

TOTAL PARKING REQUIREMENTS:	62,480 / 250 = 249.9 (250) STALLS
EXISTING PARKING STALLS:	252 STALLS
PROPOSED PARKING STALLS:	259 STALLS
PER CBC TABLE 11B-208.2, (6) ACCESSIBLE SPACES ARE REQUIRED. (1) VAN ACCESSIBLE SPACE (CBC 11B-208.2.4)	
NUMBER OF ACCESSIBLE PARKING SPACES PROVIDED	7 ACCESSIBLE STALLS
NUMBER OF VAN ACCESSIBLE PARKING SPACES PROVIDED	1 ACCESSIBLE VAN STALL
TOTAL NUMBER OF ACCESSIBLE SPACES PROVIDED	8 ACCESSIBLE STALLS

SHEET NAME:
OVERALL SITE PLAN

SHEET NO.:

A100

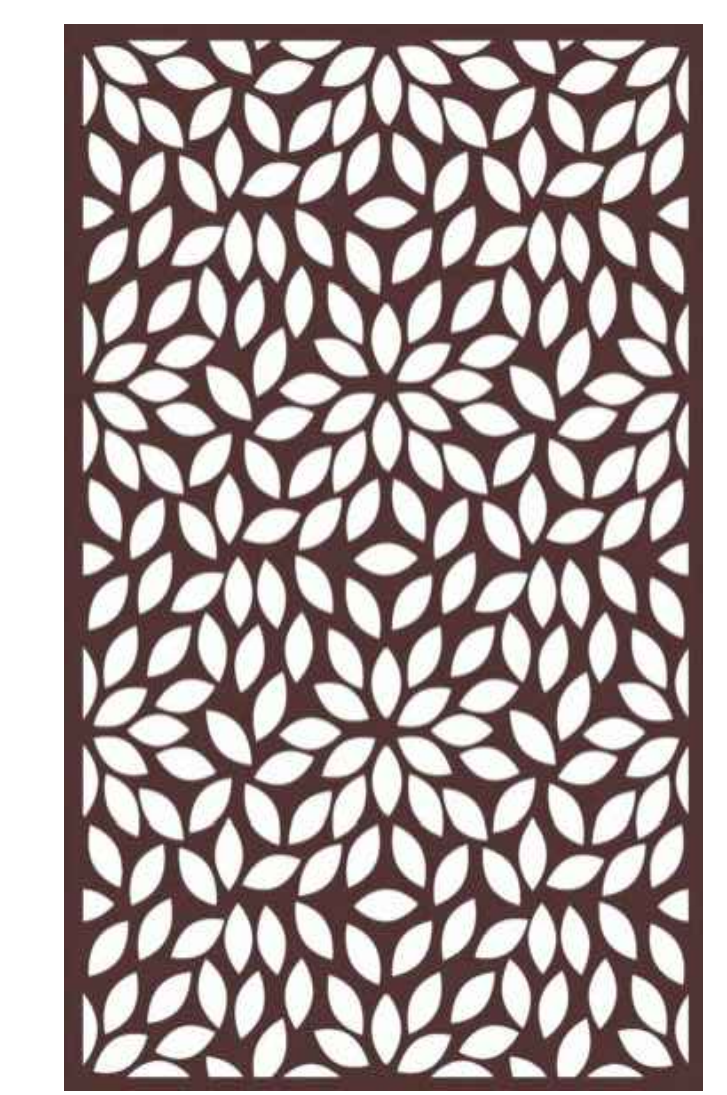
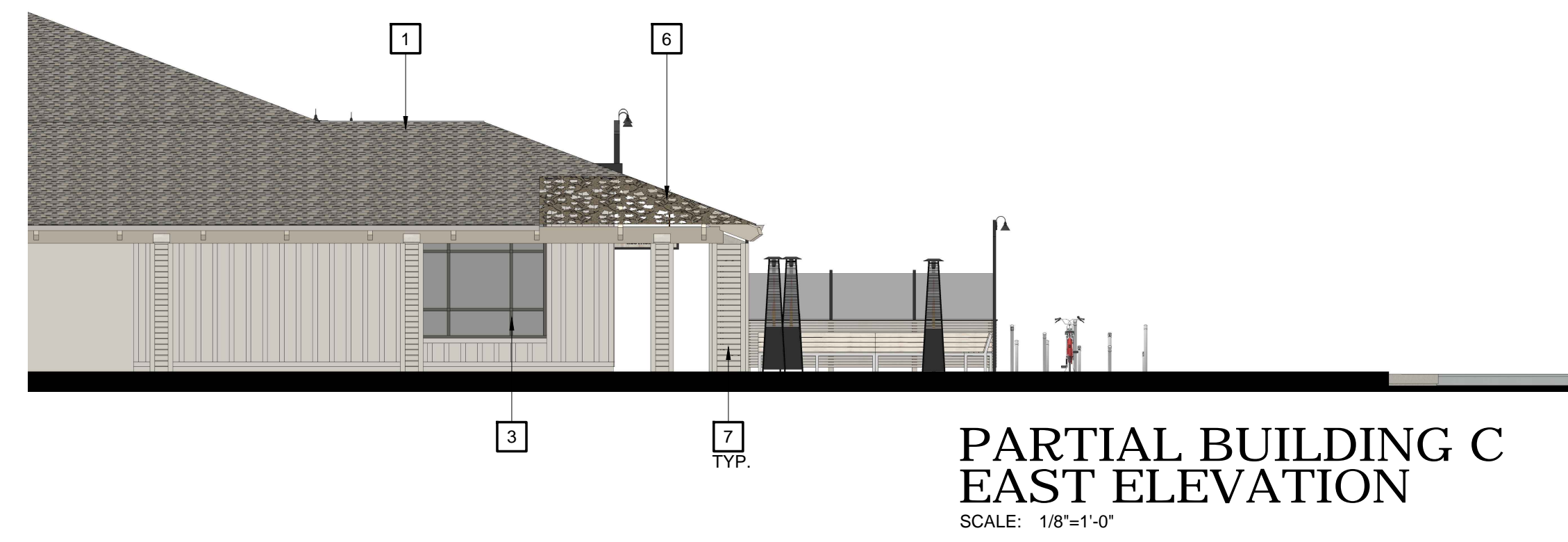
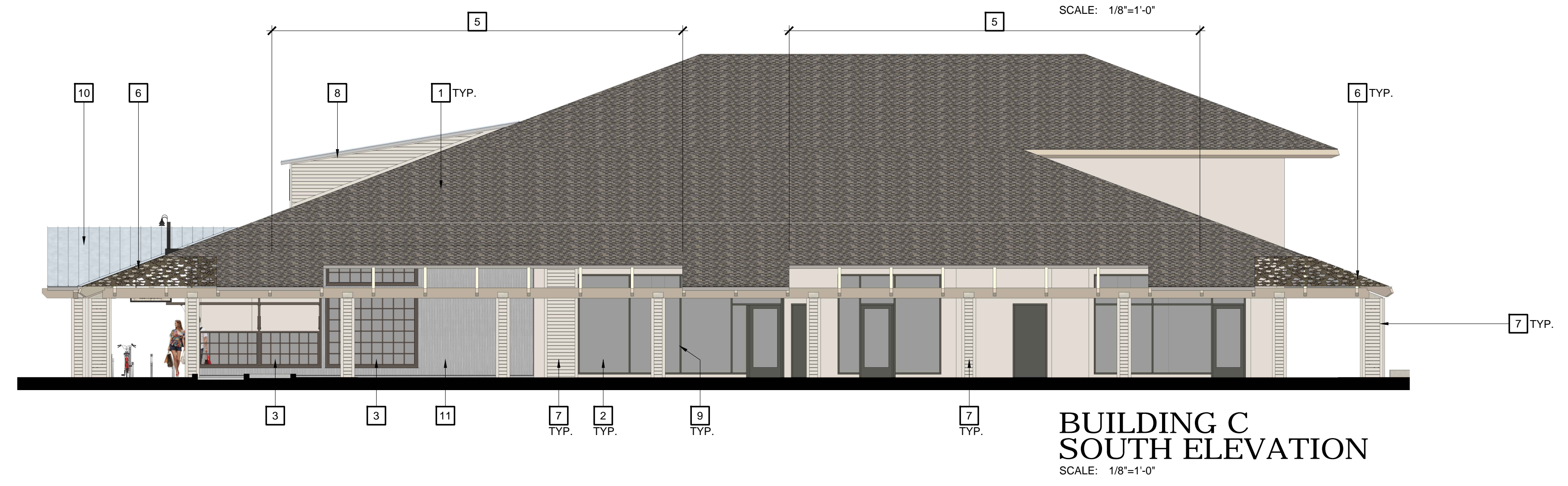
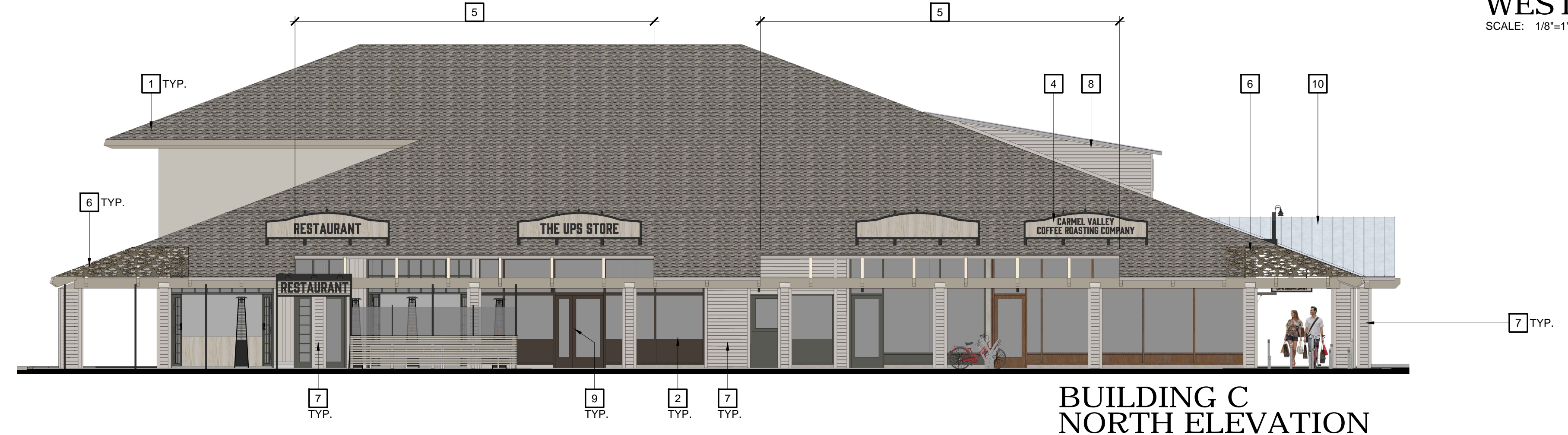
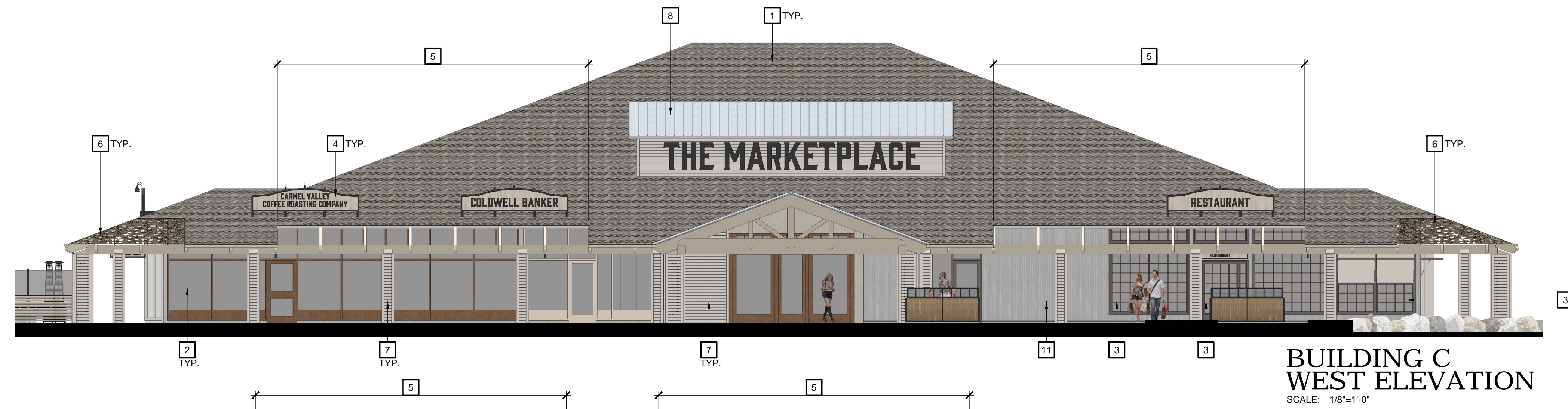
FILE NAME: 18011-A100

PLAN NORTH
TRUE NORTH

OVERALL SITE PLAN
SCALE: 1" = 20'-0"

KEY NOTES

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- 1 INDICATES EXISTING ROOF TO REMAIN. CONTRACTOR TO PROTECT FROM DAMAGE.
 - 2 INDICATES EXISTING STOREFRONT GLAZING TO REMAIN. CONTRACTOR TO PROTECT FROM DAMAGE.
 - 3 INDICATES LOCATION OF NEW WINDOWS. COLOR TO BE 'DUNN EDWARDS' DET630 RENWICK BROWN WITH A SATIN FINISH.
 - 4 INDICATES BUILDING SIGNAGE.
 - 5 INDICATES NEW OPENINGS AT THE EXISTING COVERED WALKWAYS.
 - 6 INDICATES NEW ARTISAN ALUMINUM PANELS. THE PANELS WILL ONLY BE LOCATED AT THE CORNER OPENINGS. SEE 1/A401 FOR EXAMPLE OF PANEL.
 - 7 INDICATES NEW 1'X4 HORIZONTAL SIDING TYPICAL AT EXTERIOR WALLS AND EXTERIOR COLUMNS. COLOR TO BE 'DUNN EDWARDS' DE6212 CRISP MUSLIN.
 - 8 INDICATES NEW ROOF DORMER, MARQUEE SIGNAGE LOCATION. ROOF DORMER TO HAVE 'BERRIDGE' METAL STANDING SEAM ROOF SYSTEM. COLOR TO BE NATURAL METAL FINISH.
 - 9 INDICATES EXISTING STOREFRONT FRAMES TO BE PAINTED. COLOR TO BE 'DUNN EDWARDS' DET630 RENWICK BROWN WITH A SATIN FINISH.
 - 10 INDICATES 'BERRIDGE' STANDING SEAM ROOF SYSTEM AT ENTRY ROOF GABLE. COLOR TO BE NATURAL METAL FINISH.
 - 11 INDICATES CORRUGATED METAL PANEL. COLOR TO BE NATURAL METAL FINISH.



1 ARTISAN PANEL
ALUMINUM BRONZE
SCALE: N.T.S.

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ELEVATIONS**

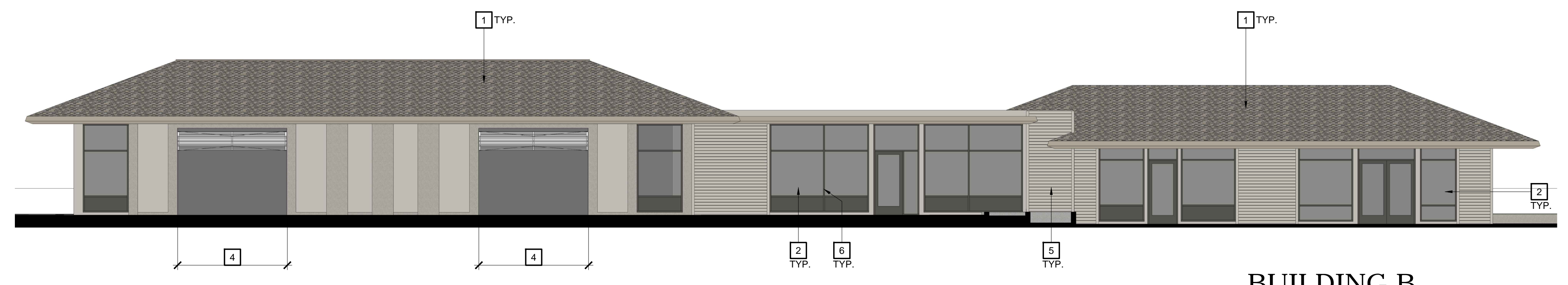
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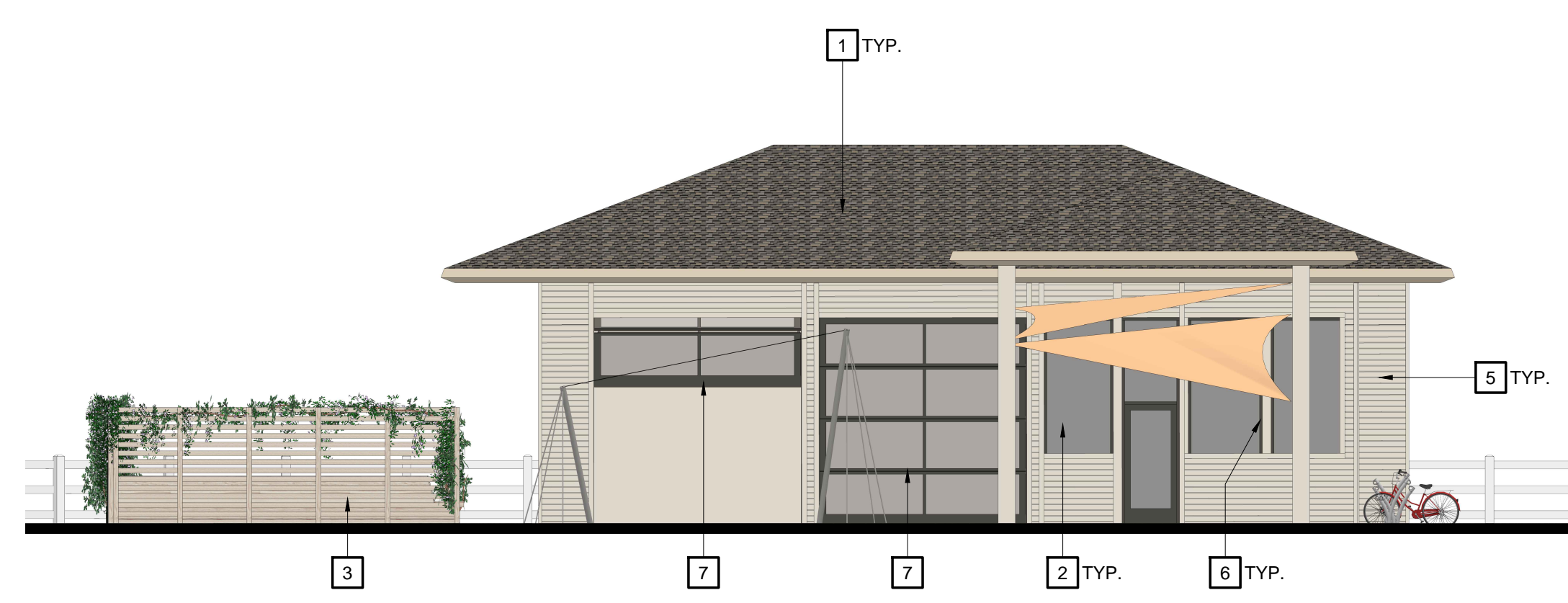
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KEY NOTES

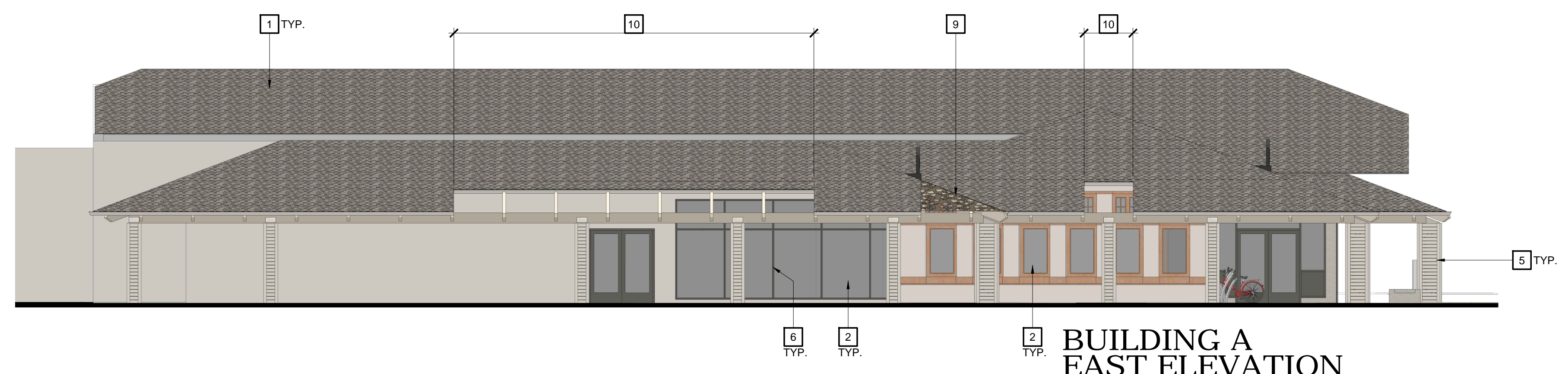
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- 1 INDICATES EXISTING ROOF TO REMAIN. CONTRACTOR TO PROTECT FROM DAMAGE.
 - 2 INDICATES EXISTING STOREFRONT GLAZING TO REMAIN. CONTRACTOR TO PROTECT FROM DAMAGE.
 - 3 INDICATES NEW FENCING AROUND ENCLOSED OUTDOOR AREA.
 - 4 INDICATES NEW 9'-0" HIGH x 12'-0" WIDE OPENINGS w/ SECTIONAL ROLL UP DOORS FOR OUTDOOR ACCESS.
 - 5 INDICATES NEW 1X4 HORIZONTAL SIDING TYPICAL AT EXTERIOR WALLS AND EXTERIOR COLUMNS. COLOR TO BE 'DUNN EDWARDS' DE6212 CRISP MUSLIN.
 - 6 INDICATES EXISTING STOREFRONT FRAMES TO BE PAINTED. COLOR TO BE 'DUNN EDWARDS' DET630 RENWICK BROWN WITH A SATIN FINISH.
 - 7 INDICATES EXISTING SECTION ROLL UP DOOR FRAMES TO BE PAINTED WITH COLOR TO BE 'DUNN EDWARDS' DET630 RENWICK BROWN WITH A SATIN FINISH.
 - 8 INDICATES BUILDING SIGNAGE.
 - 9 INDICATES NEW ARTISAN ALUMINUM PANELS. THE PANELS WILL ONLY BE LOCATED AT THE CORNER OPENINGS. SEE 1/A401 FOR EXAMPLE OF PANEL.
 - 10 INDICATES NEW OPENINGS AT THE EXISTING COVERED WALKWAYS.



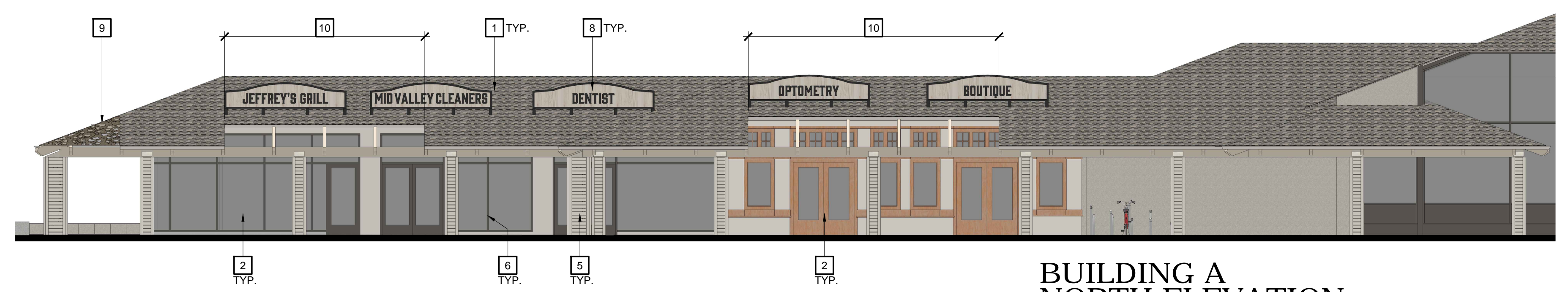
**BUILDING B
EXTERIOR ELEVATION**
SCALE: 1/8"=1'-0"



**BUILDING E
EXTERIOR ELEVATION**
SCALE: 1/8"=1'-0"



**BUILDING A
EAST ELEVATION**
SCALE: 1/8"=1'-0"



**BUILDING A
NORTH ELEVATION**
SCALE: 1/8"=1'-0"

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