



June 30, 2008

Elizabeth Caraker, AICP  
Senior Associate  
RBF Consulting  
3180 Imjin Road, Suite 110  
Marina, CA 93933

RE: Peer Review of the Historic Resource Report for Paraiso Hot Springs Prepared by Painter Preservation & Planning, February 2008.

Dear Elizabeth:

This letter has been prepared in response to your request to peer review the Paraiso Hot Springs Historic Resource Report prepared for the County of Monterey in February, 2008 (Painter Preservation & Planning, 2008). It is my understanding that the current owners of the Paraiso Hot Springs propose to develop the site; in November, 2003 the project proponents removed eighteen Victorian-era buildings on the site without a demolition permit in preparation for the proposed development. Subsequent to the demolition of the buildings, the County of Monterey is requiring the applicant to prepare an Environmental Impact Report (EIR) to identify the impacts that the proposed project may have on the environment in compliance with the California Environmental Quality Act (CEQA).

In February, 2008, Diana Painter of Painter Preservation & Planning prepared a Historic Resource Report of Paraiso Hot Springs that documented and analyzed the significance of the Paraiso Hot Springs buildings and landscape against the California Register Criteria in accordance with CEQA. Ms. Painter's report supplemented a prior report prepared in 2005 by Dr. Robert Cartier entitled *Revised Evaluation of Historic Resources at the Paraiso Springs at 34358 Paraiso Springs Road in the County of Monterey* that had concluded that the area was not significant as a historic district. To augment Cartier's report, Painter's 2008 Historic Resource Report evaluated the Hot Springs as a cultural landscape in a format recommended by *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. The report analyzed all major buildings over 50 years of age as of 2008, but documented the site as it existed in 2003 prior to the demolition of the eighteen buildings. The Painter report concluded that the Paraiso Hot Springs does not retain integrity as a historic vernacular landscape. However, Ms. Painter concluded that nine (9) of the buildings that were present in 2003 were individually historical resources for the purposes of CEQA.

Galvin Preservation Associates Inc. (GPA) was sub-contracted by RBF Consulting, on behalf of the County of Monterey to peer review the adequacy of the cultural resource

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reports as part of the EIR process. This peer review was conducted by Andrea Galvin, principal of Galvin Preservation Associates Inc. in June, 2008. Ms. Galvin visited Paraiso Hot Springs on June 27, 2008 and reviewed the documentation prepared by Painter Preservation & Planning. The report was reviewed for 1) general findings of eligibility, 2) thoroughness of the evaluation and consistency with the CEQA Guidelines as they relate to historic resources, and 3) the relevance and adequacy of the conclusions and the proposed mitigation measures. In addition, GPA determined whether or not any historical resources will be affected by the proposed project.

### **Summary of General Findings of Eligibility**

The CEQA Guidelines establishes that a "historical resource" is a property that is listed in or determined eligible for the California Register of Historical Resources. Therefore, the Paraiso Springs Historic Resources Report has evaluated the property against the California Register. The property has been identified as both a district and as a rural historic landscape. In addition, the report evaluates each property that is more than 50 years old individually for potential significance. I agree that the property constitutes a district and contains the general characteristics of a rural historic landscape; therefore the report adequately identifies the resource. The report identified twenty-six (26) buildings that were present in 2003, although eighteen (18) of those buildings have since been demolished. Nine (9) of the identified buildings were not evaluated due to their age or due to the fact that they had been moved and therefore were presumed to not be historically significant. Of the remaining seventeen (17) buildings that were evaluated as part of the report, eight (8) were determined not to be historically significant due to a lack of integrity and nine(9) were determined to be individually significant because they met the California Register of Historical Resources individually.

Ms. Painter does a very nice job of preparing the general historic context of the site over time. Based on the context, the period of significance was defined as 1872-1928, which reflects the date the first resort building was constructed on the site to the date that the fire destroyed the main hotel. Additionally, the context defined the area of significance as entertainment/recreation. Based on the defined context and the history of the site, the property clearly has historic significance within the identified context within the local area. However, a property must have historic significance and retain enough physical characteristics to convey its significance to be considered a historical resource for the purposes of CEQA. Therefore, this peer review takes into the account both the evaluation of the site within its context and the presence and integrity levels of each of the identified resources that constitute the site as a whole.

After visiting the site and reviewing the report, I agree with Ms. Painter's conclusion that the site as a whole does not meet the California Register of Historical Resources as a rural historic landscape or as a historic district due to an overall lack of integrity. This is due to the fact that the property has undergone numerous physical changes over the course of the past 80-100 years, such that the property no longer contains enough of the physical character defining features from the property's period of significance to

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adequately convey the property's historic significance. Therefore, the property as a whole is not a historical resource for the purposes of CEQA.

In addition to the evaluation of the property as a whole, Ms Painter also evaluated the extant buildings individually for historic significance against the California Register Criteria. Some of the buildings and features that were evaluated were of fairly recent construction (dating outside the property's period of significance) and were determined not to be historically significant. These include the Main Lodge (Map Reference #1), the Recreation Room (Map Reference #4), and the Workshop (Map Reference # 8).

Additionally, several other minor buildings and structures were evaluated and determined not to be historical resources for the purposes of CEQA. These include the swimming pools (Map Reference # 25), changing room/ rest rooms (Map Reference #5), the old baths (Map Reference #6), Indoor Bath (Map Reference #7), the basketball area, the pump house, the boiler room, and the fire equipment room. These determinations were made based on their overall integrity levels or their lack of historical contribution to the overall historic context.

However, nine (9) Victorian-era buildings were determined to meet the California Register individually due to their importance to the history of the site, their reflection of important architectural trends at the time, their relative integrity, and their relative rarity on the site and as part of the Victorian-era spa movement in the Monterey region. These include the Evergreen Cottage (Map Reference #12), the Brightside Cottage (Map Reference #13), the Monterey Cottage (Map Reference #14), the Cyprus Cottage (Map Reference #15), Romie Cottage (Map Reference #16), Buena Vista Cottage (Map Reference #17), Antlers Cottage (Map Reference #18), Pioneer Cottage (Map Reference #19), and Spreckels Cottage (Map Reference #23). The report found the Victorian-era pool not to be individually eligible for listing on the California Register due to a lack of integrity.

Overall, I agree with the individual significance determinations of the resources present in 2003. Therefore, there were nine (9) historical resources present within the proposed project area that had the potential to be impacted by the proposed project.

### **Evaluation of Consistency with the CEQA Guidelines**

In addition to review of the report for the general evaluation of significance, GPA reviewed the report for general consistency with the CEQA Guidelines as it relates to the evaluation of impacts to historical resources. Nine (9) resources were identified in the historical evaluation associated with this project. The Painter Report adequately identifies the resources present within the proposed project area and prepared a relevant historic context within which to evaluate the resources present. Additionally, the Painter Report adequately steps through the process of evaluating the resources according to National Register Bulletin Guidelines for Evaluating and Documenting Rural Historic Landscapes, including the evaluation of the natural systems and features, spatial organization, land use, cultural traditions, cluster arrangement, circulation, topography,

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vegetation, etc. The period of significance for the site was adequately identified and the contributing and non-contributing resources were also identified.

However, in addition to the evaluation of resources, CEQA also calls the lead agencies to assess the impacts that proposed projects may have on the environment, including ways to avoid or minimize impacts. This project is unusual in that the impacts on the environment had already occurred and therefore an analysis of ways to avoid or minimize impacts to the nine identified historical resources was a mute point. Yet, although the pre-mature demolition of the resources had an obvious impact on those resources, the report does not clearly step through the process of stating what the threshold of a significant impact is as defined by CEQA, including a substantial adverse change to historical resources. Nor does it identify ways to avoid or minimize impacts on those resources first.

A project that may have an impact on historic resources is a project that may cause a substantial adverse change on those resources such that the significance of that property may be materially impaired. Projects that materially impair historical resources are those projects that physically demolish or alter those characteristics that qualify them for the California Register of Historical Resources. Therefore, in the case of the project at Paraiso Hot Springs, the demolition of eighteen (18) buildings on the site would have a significant impact on nine identified historical resources because the removal of those resources would negate their ability to convey their historical significance.

### **Relevance and Adequacy of Proposed Mitigation Measures**

Typically, a project that has a significant impact on a historical resource must be mitigated (if possible to a level of less than significant). Mitigation measures are only required for impacts that are found to be significant and those mitigation measures should be commensurate to the level of impact on those historical resources. The measures must be enforceable through the local governing body and in themselves not cause an impact on the environment. The Painter Report modified a list of recommended mitigation measures prepared by Dr. Cartier in 2005 to include the following:

1. That any historic irrigation or related water conveyance structures discovered in the course of development be thoroughly documented, preserved and interpreted;
2. That Thompson Holdings LLC make copies of their own historic archives as well as obtain copies of additional materials available in the California State Library and California Historical Society that portray what Paraiso was like in the late nineteenth century and make these materials available to an appropriate historical society or museum as a collection. Thompson Holdings LLC will negotiate a matching grant to the selected entity, up to \$10,000, to assist with accessioning, cataloguing, displaying and archiving the collection. The Painter Report recommends that the entity be selected with a view to reaching the broadest and most relevant audience. Additionally, the report recommends that Thompson Holdings retain copies of these materials for their own on-site, interpretive display.

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3. That a brochure be developed about the history of the site that can be placed in a number of venues, including the Soledad Mission and local museums and other visitor-oriented locations.
4. That the results of archival and site research on the property to date be appropriately packaged and placed in local and regional archives; at minimum the Monterey Historical Society, the Monterey Public Library, and the California State Library, all of which have large files on Paraiso.
5. That the new plans utilize interpretive information throughout the resort along trails or at vista points on the property to let visitors know that the resort has been part of a long history as a resort and spa. This includes the potential for incorporating historic names associated with the site, where appropriate.

These proposed mitigation measures will collectively will help to mitigate the impacts that the proposed project had on the environment, yet will not mitigate impacts to a level of less than significant. Mitigation measures #2, #3, and #4 should be completed regardless of proposed new construction and particularly in the event that new construction does not occur on the site. As the significant historic buildings on the site have already been demolished, impacts to these resources can not be avoided or minimized and therefore must be mitigated. If new development does not occur on the site in the future, these resources have already been lost; measures 2-4 are the only remaining means to document the significance of these identified historical resources.

In addition to the above stated mitigation measures, the Painter Report makes recommendations not to create a specific site design that responds to the historic cultural landscape context as the site was determined to lack a historic vernacular landscape and because the property was determined not to qualify as a historic district due to a general lack of integrity. This statement is justified and I agree.

However, the report also recommends that no architectural style be proposed for the new resort that is tied to the historic site as “no historic architectural context exists today on the site,” and “there is no requirement, from a historic point of view and per the Secretary of the Interior’s Standards, that new construction be compatible with an existing historic context.” I can understand this statement only in relation to the property as a whole if the project included infill design.

Yet, in contrast to this statement, the report finds that several of the historical resources met the California Register under Criterion 3 because of their architectural style; particularly as rare examples of Victorian-era Gothic Revival style vernacular buildings. I agree that the identified historical resources were rare and very good examples of this style of architecture, particularly in California where the Gothic Revival style was not prevalent. These resources have been lost to demolition. Therefore, at least one mitigation measure should directly relate to the architecture of the site because the architecture is the basis for their historic significance. Therefore, I do not believe that it is outside the purview of the County to require that the cabins be reconstructed according to the Secretary of the Interior’s Standards for Reconstruction or that any new construction

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adopt the Gothic Revival style in its design to reflect the historic architectural tradition of the nine historic resources that were present on the site.

Therefore, in conclusion I believe that the mitigation measures are acceptable. However, I recommend that the County consider at least one mitigation measure that directly relates to the architectural significance of the buildings that were lost. Additionally, the mitigation measures should be re-written in the Environmental Impact Report (EIR) in a manner that is specific (ie. location of repositories, to what standard irrigation systems should be documented, what is an "appropriate" method of archiving the documentation, how many copies of reports, etc.). Additionally, the mitigation measures should be written in an enforceable manner such as Conditions of Approval or similar process with clear reporting periods for completion of the mitigation. Mitigation measures #2, #3, and #4 should be completed regardless of new development.

### **Conclusion**

Overall the Historic Resource Report for the Paraiso Hot Springs contains a thorough and systematic evaluation of the resources present on the Paraiso property. The report lacked a thorough discussion of methods to avoid impacts or levels of impacts, but this is understandably due to the fact that the resources had already been demolished. Although I may hold minor differences of professional opinion on minor aspects of certain individual resources such as the evaluation of integrity of association, etc. I agree with the overall conclusions of significance of the identified resources. The property does not contain sufficient integrity to be considered a rural historic landscape or a historic district. There are nine individual buildings that meet the Criteria for inclusion in the California Register of Historical Resources. The project had a significant impact on nine identified historical resources. The proposed mitigation measures may help to mitigate the impacts on these resources, but will not mitigate to a level of less than significant. The County should carefully consider the mitigation alternatives and re-write them to be more specific and to include reporting measures for completion regardless of proposed new development of measures 2-4.

I thank you for your consideration of my comments and welcome and questions that you may have. I may be reached by telephone at 310-792-2690 or by e-mail at [andrea@galvinpreservation.com](mailto:andrea@galvinpreservation.com).

Best regards,



Andrea Galvin,  
President  
Galvin Preservation Associates Inc.