

July 15, 2013

To: Delinda Robinson, Senior Planner
From: Meg Clovis, Cultural Affairs Manager
Subject: ANALYSIS OF REPORTS RECEIVED RE: 1170 SIGNAL HILL ROAD
(THE CONNELL HOUSE) PLN100338

In response to your recent request, I have completed a review of historical reports received to date by the County of Monterey regarding the significance of the Connell House located at 1170 Signal Hill Road in Pebble Beach. I concur with Dr. Anthony Kirk's opinion that the property does qualify for inclusion in the California Register of Historical Resources under Criterion 3.

My qualifications and experience to perform such a review span the past 35 years. After graduating from Boston University with a M.A. in Historic Preservation, I staffed the Ipswich Historical Commission in Ipswich, MA. I moved to California in 1979, and joined the firm of Charles Hall Page and Associates in San Francisco as an architectural historian. During that time I also did consulting work principally in the Santa Clara County area. In 1981 I was hired by Monterey County as County Historian and have served in that capacity for 32 years. I staff the County's Historical Advisory Commission and Museum Board. From 1998 to 2013 I staffed the County's Historic Resources Review Board. I am well versed in the criteria for both the California Register and the National Register and I meet the Secretary of the Interior's qualifications for Architectural Historian and Historian.

Background

The California Office of Historic Preservation recommends utilizing *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* when assessing a property for eligibility to the California Register of Historic Resources (CRHR).¹ As outlined in *Bulletin 15*, in order for a property to meet the criteria a building must be 1) associated with an important historic context and 2) retain historic integrity of those features necessary to convey its significance.

Architectural Historian Dr. Anthony Kirk prepared a Phase One report for property owner Massy Mehdipour for 1170 Signal Hill Rd. in Pebble Beach, known as the Connell House in October, 2010. Dr. Kirk found the property eligible for listing under Criterion 3 of the California Register. A property is eligible for listing under Criterion 3 if "it embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of a master, or possesses high artistic values."

Within the context of Modern Architecture in Pebble Beach, Dr. Kirk's report states that the Connell House is significant under CRHR Criterion 3 at a local level because it "embodies the distinctive characteristics of the American International or Contemporary

¹ U.S. Department of the Interior, National Park Service, *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 15, rev. ed. ([Washington D.C.: U.S. Government Printing Office], 1991).

style and reflects as well the design approach associated with the forward-looking second phase of the Bay Area Tradition.” In this case, the distinctive characteristics are drawn from the International Style, which Richard Neutra introduced to the United States in the 1920s. These characteristics include post-and-beam construction, cantilevered roof slabs and projecting beams, ribbon windows and glass walls, and what is considered “the single most essential character of his work, ‘the interpenetration of inner and outer space.’” These characteristics are evident in the Connell House.

In addition, Dr. Kirk found that despite a 1993 addition and some changes to the fenestration, that the character-defining features of the Connell House, including the original plan, form, fenestration, features, finishes and setting are still intact and therefore it retains its integrity.

Reports Received

On July 5, 2011, the Monterey County Planning Department received a peer review of Dr. Kirk’s assessment, prepared by Circa: Historic Property Development (Circa) Principal Sheila McElroy. In her peer review Ms. McElroy concludes that the Connell House is not eligible for listing under CRHR Criterion 3 because it “is not identified as one of Neutra’s exemplary or particularly distinctive residential designs” and is therefore of marginal significance and is not important to his body of work. Within the meaning of Criterion 3 a property is not eligible as the work of a master simply because it was designed by a prominent architect. Rather, the property must express a particular phase in the master’s career, an aspect of his or her work or a particular idea or theme. Per *Bulletin 15*, Ms. McElroy’s peer review of the second part of Criterion 3 is correct based on the evidence received, however it does not negate Dr. Kirk’s finding under the first part of Criterion 3.

On August 4, 2011 the HRRB considered both Dr. Kirk’s original report and Ms. McElroy’s peer review. After receiving public testimony and the considered opinions of the HRRB, the HRRB recommended to the Planning Department “that the residence in question does appear to be significant at the local level under Criterion 3 of the California Register of Historical Resources for, among other aspects, its architecture which embodies the distinctive characteristics of the American International or Contemporary style and reflects the design approach associated with the forward-looking second phase of the Bay Area Tradition.”

On October 24, 2011 the Monterey County Planning Department received a second peer review from Ms. McElroy which states that “the residence at 1170 Signal Hill Rd. does not exemplify the Second Bay Area Tradition and therefore the HRRB recommendation cannot be substantiated. On this basis the property also does not qualify for listing on the national, state or local registers.” However, Dr. Kirk’s report states that the residence “embodies the distinctive characteristics of the American International or Contemporary style” and “Architecturally, the house draws more on the ideals of the International Style than the Bay Area Tradition.” The reference to the Bay Area Tradition is related to how the house is sited and “the sensitivity with which it is set in the landscape.”

Ms. McElroy also refers to the seemingly late date of the house within the context of Modernism in Pebble Beach. Testimony received at the HRRB hearing by architectural historian Kent Seavey² explained that because of Mr. Morse's predilection for the Mediterranean Revival Styles, few modern styles were introduced to Pebble Beach until Morse began to relax his strict building parameters after WWII.

On November 16, 2011, Delinda Robinson received an email from Thomas Hines, UCLA Professor of History and Architecture, Emeritus, which stated that he strongly disagreed with Ms. McElroy's findings. Dr. Hines, who wrote *Richard Neutra and the Search for Modern Architecture*,³ considers the Connell House an "important work of architecture."

On December 8, 2011, Sheila McElroy submitted a third report, which assessed the Connell House's eligibility for listing on the County's Local Register of Historic Resources. She concluded that the building did not meet the eligibility criteria.

On February 2, 2012, Delinda Robinson received a letter from Barbara Lamprecht, a Neutra scholar and author of *Richard Neutra – Complete Works* and *Richard Neutra – Survival Through Design*.⁴ Lamprecht argues that the Connell House is a significant representative of Neutra's work and sums up her 3 page analysis with, "In my opinion, the Art Connell House would be considered an historic resource under CEQA."

On March 12, 2012, the Monterey County Planning Department received a *Response and Rebuttal to Comments by Circa: Historic Property Development and Bill Bernstein, AIA on the Evaluation of the Connell House, Pebble Beach, California Recorded by Anthony Kirk, Ph.D, 15 October 2010*. In this report Anthony Kirk expands on his original evaluation of the Connell House, rebuts reports received by Sheila McElroy and a letter from Bill Bernstein, and confirms his original findings. In fact, he concludes that, based on his expanded analysis, that the house also appears eligible "as a significant expression of the architectural genius of Richard Neutra."

In April, 2012 Monterey County submitted a grant to the Office of Historic Preservation for the purpose of preparing a context statement for Pebble Beach. The County was subsequently awarded a grant and the County selected, through a RFP process, the historic preservation firm of Page and Turnbull to prepare the context statement.

On May 21, 2012, Delinda Robinson received another report from Circa (dated May 18, 2012) which included 1) another evaluation of the Connell House based on Monterey County's Historic Register evaluation criteria 2) the results of a survey of 900 homes in the vicinity and 3) rebuttals to letters and emails that state the Connell House is

² Kent Seavey teaches a class on Monterey County's Modern Architecture at Monterey Peninsula College, has edited the publication, *Architecture of the Monterey Peninsula* and contributed to the Modernism inventory for the Documentation and Conservation of the Modern Movement on the Monterey Peninsula project.

³ Thomas Hines, *Richard Neutra and the Search for Modern Architecture*, 4th ed. (New York:Rizzoli, 2005).

⁴ Barbara Lamprecht, *Richard Neutra: Complete Works*, (Taschen 2000); *Richard Neutra, Survival Through Design* (Taschen, 2004).

significant from Dion Neutra, Barbara Lamprecht, DOCOMO⁵, and Thomas Hines. Included in the packet was a letter from Robert Chattel, President of Chattel Architecture, Planning and Preservation.

On July 15, 2013 Page and Turnbull submitted their final draft of the Pebble Beach context statement to Monterey County for review. The context statement follows the format prescribed by OHP and *Bulletin 15* in that it provides a historical background of the project area, identifies themes and property types and then establishes eligibility guidelines and integrity thresholds for each property type. The Connell House falls under the theme *Pebble Beach Post War (1946 – 1969)*. The property type is identified as Modern and more specifically as an example of the International style. On page 111 the Connell house is specifically mentioned as follows, “Other notable works in Pebble Beach include the Arthur Connell house at 1170 Signal Hill Road, built in 1958. Designed by master architect Richard Neutra, it appears to be an extremely rare example of an International style residence in Pebble Beach.” On page 120 the Connell House is referenced once again, this time under the Character Defining Features discussion as an example of the International style. The Connell House clearly meets the stated significance thresholds for the National Register, California Register and Monterey County Register, described on page 121, as follows:

“Residential buildings from this period may be significant for their architecture, as expressed by intact stylistic features, forms or construction methods. However, suburban Ranch style buildings are very common in Pebble Beach and California as a whole. Thus, architectural significance is best reserved for buildings that demonstrate particularly strong artistic merit, or clearly demonstrate the influence of a particular architect or builder. Consideration should also be given to examples of styles that are relatively rare as compared to other residential buildings of the period. Resources qualified under this criterion must be excellent examples of types and/or styles, and to retain most of their original features. In order to qualify for national, state, or local listing under this criterion, a mid-century residence must be an outstanding example of a Modern architectural style, and should ideally represent the work of a master architect.”

On page 112 Richard Neutra is listed as one of the master architects who designed homes in Pebble Beach and the Arthur Connell house is listed as the only example of his work in the context area.

Evaluating Properties within a Historic Context

Bulletin 15 states, “Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties if: it is the sole example of a property type that is important in illustrating the historic context or it clearly possesses the defined characteristics required to strongly represent the context.”⁶ Per Dr. Kirk’s March 12, 2012 evaluation of the Connell House, he confirms his original conclusion that the Connell House “embodies the distinctive characteristics of the American International style” and therefore clearly possesses the

⁵ Documentation and Conservation of the Modern Movement on the Monterey Peninsula

⁶ National Park Service, *How to Apply the National Register Criteria for Evaluation*, 9.

defined characteristics required to strongly represent the context in question. To date, no opinion has been submitted to the contrary, in other words, no report has been received that concludes that the Connell House **does not** embody the distinctive characteristics of the American International style. Therefore, per *Bulletin 15* instructions and information received to date, 1170 Signal Hill Road does not have to be evaluated against other properties.

Dr. Kirk evaluated the Connell House within the historic context of “Modern Architecture of Pebble Beach”. Ms McElroy, in her May 18, 2012 report, borrows from the *San Francisco Modern Architecture and Landscape Design (1935-1970) Historic Context Statement* prepared by the San Francisco City and County Planning Department, September 2010, to further define this context. In her report Ms. McElroy includes the following passage from San Francisco’s context statement: “For the purpose of this context statement, the terms Modern and Modernism will refer to a **style and design vocabulary** (emphasis added) in the United States that spanned from the late 1920s through the 1960s.” Although Ms. McElroy uses San Francisco’s Modern Architecture Historic Context (and includes the summary of the stylistic variants within Modernism in her report) to help define her report’s context, she does not use the context’s definition of the term Modern. Rather, she defines Modern based on construction dates, lumps all buildings together based on these dates, ignores stylistic variants and uses these premises as the foundation of her survey methodology. This methodology is not consistent with the *Secretary of the Interior’s Standards for Evaluation*⁷ or survey guidelines described in National Register Bulletin 24, *Guidelines for Local Surveys: A Basis for Preservation Planning*.⁸ *Bulletin 24* explains that a survey results in an “organized compilation of information on those properties that are evaluated as significant. Evaluation is the process of determining whether identified properties meet “**defined criteria** (emphasis added) of historical, **architectural** (emphasis added), archeological or cultural significance.” The results of Ms. McElroy’s survey give us the following information: 1) the number of homes constructed in Pebble Beach between 1944 and 1962 and 2) if the homes have a view of the ocean or golf course or both. This information does not correspond to any **defined criteria** and therefore does not give us the data necessary to evaluate any of these structures for significance within the context of Modern Architecture in Pebble Beach.

Bulletin 15 reviews the five factors that must be determined in order to evaluate whether or not a property is significant within its historic context. They are:

- 1) Determine what facet of history the property represents.
- 2) Determine if that facet of history is significant.
- 3) Determine if the property type has relevance and importance in illustrating the historic context.

⁷ Archeology and Historic Preservation: Secretary of the Interior’s Standards and Guidelines, Federal Register, September 29, 1983 (48FR44716).

⁸ U.S. Department of the Interior, National Park Service, *Guidelines for Local Surveys: A Basis for Preservation Planning*, National Register Bulletin 24, re. ed. ([Washington, D.C.: U.S. Government Printing Office], 1985).

- 4) Determine how the property illustrates that history.
- 5) Determine if the property possesses the physical features necessary to convey the aspect of history with which it is associated.

Using this systematic approach, (described by Dr. Kirk in his report dated March 12, 2012), Dr. Kirk determined that the Connell House is significant under Criterion 3 of the California Register. Properties eligible for Criterion 3 must **embody the distinctive characteristics of a type**, region or method of construction. In this case the type is the American International style. Counting homes that were built between 1944 and 1962 and the views they may or may not enjoy has no bearing on evaluating the significance of the Connell House, or any other house in Pebble Beach. The Circa survey does not identify any homes within the historic context that embody the distinctive characteristics of the American International style. Therefore the survey does not establish a basis of comparison whereby the Connell House can be evaluated against other examples of this property type. The survey methodology is not based upon the *Secretary of the Interior's Standards for Evaluation* and therefore the survey does not constitute substantial evidence for the purposes of CEQA.

Ms. McElroy conducted a “windshield survey” of Pebble Beach properties constructed between 1944 and 1962. These homes had 1) a view of the ocean and golf course 2) a view of the ocean only or 3) a view of the golf course only. She determined that a total of 134 Modern (the classification of Modern was based on construction date, not on a stylistic analysis) residences shared a similar setting as the Connell House. Since Ms. McElroy established at the outset of her report that she was utilizing terms defined in San Francisco’s Modernism survey, it is unclear why she predicated her survey on views rather than Modern architectural styles. The San Francisco Historic Context develops eight modern style evaluative frameworks, which reflects the most prevalent modern architectural styles in San Francisco. In addition, the character-defining features of each style are listed. Character-defining features must be considered as part of the evaluation process. *Bulletin 15* states, “Distinctive characteristics are the physical features or traits that commonly recur in individual types, periods or methods of construction. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period or method of construction.”⁹ However, Ms. McElroy chose to ignore architectural styles and their individual character-defining features in her survey.

Bulletin 15 states, that if a property is compared to other properties, it “will have to be evaluated against other examples of the property type.” Since Ms. McElroy chose to ignore the stylistic variants within the historic context, she did not compare the Connell House to other examples of the property type. Construction dates and views are immaterial in this context. Rather it is architectural styles that inform the context.

On June 7, 2012 I met with Sheila McElroy to review photographs of the 134 Modern residences with views she identified in her survey. Of the photographs I reviewed, none of the homes exemplified the American International style. Based on this information, it

⁹ National Park Service, *How to Apply the National Register Criteria for Evaluation*, 18.

may be inferred that the Connell House is the sole example of the American International style within the context of Modern Architecture in Pebble Beach and therefore, per *Bulletin 15*, it is not necessary to compare it against other properties.

Robert Chattel's letter dated April 19, 2012 states that "We do not concur with the consultant's findings [Dr. Kirk] that the subject property is significant under California Register Criterion 3 for its association with the second Bay Area tradition." It is unclear why he made this statement because Dr. Kirk's evaluation concluded that the Connell house was significant under Criterion 3 because it "embodies the distinctive characteristics of the American International style." It can only be presumed that, as an historic preservation professional, Mr. Chattel cannot honestly say that the Connell House is not a representative of the American International style.

Finally, a context statement is the cornerstone for the evaluation of the historical significance of any property. *Bulletin 15* states, "The significance of a historic property can be judged and explained **only** (emphasis added) when it is evaluated within its historic context". It is abundantly clear from the sections cited from the Pebble Beach Context Statement above that the Connell House is a significant within its historic context.

Conclusion

Based on my review of Dr. Kirk's reports, my review of other reports that have fallen far short of professional standards and the Pebble Beach Context statement it is my determination that the Connell House is historically significant.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read "Mea Glavis". The signature is written in a cursive style with a large, looping flourish at the bottom.