

TIM KELLEY CONSULTING, LLC
HISTORICAL RESOURCES

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John Bridges, Esq.
Fenton and Keller
P.O. Box 791
Monterey, CA 93942-0791

APPLICANT SUBMITTAL

Via email: jbridges@fentonkeller.com

Dear Mr. Bridges:

As you requested, I have reviewed the file on the Connell House, 1170 Signal Hill Road, Pebble Beach. In particular, I have reviewed documentation regarding a proposed mitigation program for demolition of the existing building, which has been alleged to be an Historical Resource. Two mitigation measures have been proposed and agreed to by the property owner:

1. Historical American Building Survey (HABS) level recordation including large format perspective-corrected photographs and a written report.
2. Funding in the amount of \$55,000 to help finance a survey and context statement on modernist architecture in Pebble Beach.

You have asked me specifically whether these mitigations appear to mitigate the proposed demolition to a less than significant level. In considering this question, I have examined the mitigations from the two fundamental considerations of any appropriate CEQA mitigation:

1. Nexus [PRC 15126.4(a)(2)(A)]
2. Proportionality [PRC 15126.4(a)(2)(B)]

In my opinion, the proposed mitigations meet both considerations and therefore do substantially reduce and lessen project impacts to a point where clearly no significant effect on the environment would occur.

Regarding Nexus, it is necessary first to identify the supposed impacts to be mitigated. In this case there are two distinct impacts implicitly alleged, loss of the Connell House itself and loss of the Connell House as a part of the visual character of the Pebble Beach area Circa Historic Property Development identified approximately 134 nearby homes as sharing characteristics of setting and design.¹

Proposed mitigation #1, HABS recordation of the Connell House would address the loss of the building directly by archival preservation of its design and appearance, thus satisfying the requirement for a clear nexus.

Proposed mitigation #2, funding for a survey and context statement of modernist architecture in Pebble Beach directly addresses the loss of the Connell house as part of the visual character of the Pebble Beach area by helping to formalize recordation of

¹ Circa letter to Massy Mehdipour May 18, 2012

similar homes in the area and providing a framework for evaluating any future projects that would affect that character. This provides a clear nexus to the identified impact on the area.

In considering Proportionality regarding the loss of the House itself, I note that the building is actually only minimally visible from the public right of way. In fact, the current visibility of the building from 17 Mile Drive is historically anomalous due to the recent removal of mature trees that formerly concealed the building near totally. Public visibility is an important consideration under CEQA, since the environment intended to be protected is the environment that can be perceived. So, the question is, if the Connell House were to disappear, what tangible impact would that have on the environment? Without going in to an extensive analysis, I think it is obvious that the loss to the public, while real, would be lessened by the negligible visibility of the building as it historically existed.

The CEQA Guidelines state that "in some cases photographic documentation may not be adequate mitigation for a demolition" implying that in some cases it may. The minimal visibility of the alleged Resource in this case would move consideration of the impact of its loss further towards the latter situation, i.e. one where HABS documentation would be adequate mitigation, thus satisfying the requirement for proportionality.

Regarding the Proportionality of the mitigations for the loss of the building as a visual component of community character, Circa, in their letter of May 18, 2012 states that there are a minimum of 134 buildings in Pebble Beach of like style. So, as far as can presently be determined, the loss of the Connell House would constitute a reduction of no more than .7% of these similar properties. Thus, funding for professional services to document the supposed character for future use is more than proportional to the possible impact.

I hope this will help in resolving the Connell House matter. Please let me know if you have any further questions.

Sincerely,



Tim Kelley