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June 7, 2012  
John S. Bridges  
Fenton & Keller.  
Post Office Box 791  
Monterey, CA 93942-0791

Dear Mr. Bridges,

RE: 1170 Signal Road, Pebble Beach, CA

### **Mitigation Proposals**

Inasmuch as I have been asked to comment on a pre-authored mitigation plan - drafted by CIRCA, dated April 7, 2011 - rather than to compose a new plan, I am limited to providing more general remarks as to process and intent. Proposing specific measures or identifying entities capable of administering In Lieu Funding would constitute the work of creating a plan. The fact that the property in question has not been registered as a historic resource, but has been deemed by at least one expert as locally significant, suggests that the extent of mitigation is to be determined by negotiation with the Planning authorities.

I have consulted CEQA guidelines and various documents pertaining to environmental/historic review. Regarding this property, the local authorities will have to determine the amount of mitigation required. The ideal mitigation requires two actions: providing for a restoration roughly equivalent to the project impact, and two, that there should be a clear nexus between the demolished resource and the donation or other measure selected. In other words the measure should be devoted to historic resource or resources that are proximate and related in subject to the property in question. The potential for providing funds or services to assist in either recordation or preservation of similar properties/resources depends upon whether entities are presently established who can administer such efforts. Without such an entity readily identifiable in the immediate region, another measure might be acceptable in lieu.

Based upon the precedent of habitat or other environmental mitigation measures, the tool of In Lieu Funding, ILF, has been an accepted mitigation. In those cases where impacts due to development are unavoidable a permit applicant can pay a fee in-lieu to compensate for the impacts they propose in their development plans. The fee amount is based upon the compensation costs that would be otherwise necessary to restore, enhance, create or preserve the affected resource. The fee is banked in an account to be managed by a third party and the accumulated funds can then be spent on projects that restore, enhance, or preserve other resources with similar functions and values that are located within the same region as the permitted alteration.

In such cases a third party administering organization will be responsible for identifying eligible projects through application/proposal process and by conducting a review of local sites. If no such projects are currently available a donation could be applied to a combined fund, which could be used when projects are identified. At such time the authorities may enter into an enforceable, written agreement with a public, municipal or a private nonprofit organization for a restoration or protection project.

Precedents for the mitigation of buildings to be re-used re-modeled or removed involve restoration, preservation or re-building on remote sites. I know of one case in Santa Clara County wherein a retail developer agreed to restoration and preservation of a representative portion of an existing building that was then placed on the site adjacent to the new finished commercial development. This way visitors and customers of the new facility were able to experience a relic, as it were, of the earlier building. Saving a portion of the Connell house seems to be less valuable as a community historic relic or as a useful item for either the owner or for the municipality. Removal in whole would be more useful and meaningful. However such an effort may be beyond the abilities of the local authorities and can be considered unwarranted given the unregistered and indeed disputed historic value of the house.

Inasmuch as the mitigation measure needs to be achievable and carried out prior to demolition, the resolution of the Connell house mitigation would be best and most reasonably dealt with via a high quality recordation. Recently mitigation for properties demolished in San Francisco has been achieved by developing of a HABS, Level 2 documentation. As per the Department of Interiors Standards, HABS Level 2 documentation consists of a photographic recording of the property with 8x10 negatives, a historic report and perhaps an audio-visual document, perhaps interviews with knowledgeable historians as well as people involved with the property or the architect. Richard Neutra has two sons, both of whom are caretakers of his legacy, and have been involved with preservation and protection of others of their father's works. The reports are made in triplicate; one copy is delivered to the local library, another to a historic society and the third to the California Historic Resource Information Center (CHRIC). The CHRIC for Monterey is the Northwest Information Center, located at Sonoma State University, in Rohnert Park.

The Connell house is of historic interest, an example of postwar modern architecture and a product of the office of an acknowledged master. As such the building may be worthy of registration, but at this point has no such status. As regards its demolition, the building would seem deserving of respectful and high quality mitigation. Inasmuch as the mitigation should take place prior to demolition or alteration by the present owner, the provision of documentation as outlined above would seem to be the advisable first proposal to the local authorities. Such documentation combined with an ILF in the amount of \$30,000, plus \$25,000 to be used for related reconnaissance survey to be used for development of a Context Statement on modernism in the Pebble Beach Community – a document that could then be used in the future as a basis for National Register nominations - would constitute a reasonable mitigation, and would reduce CEQA impacts of the proposed project to a less than significant level.

I trust this letter will provide useful direction for the advancing of the project at 1170 Signal Road. Please let me know if I can be of additional service.

Very best regards,

A handwritten signature in black ink, appearing to read "Paul Adamson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Adamson, FAIA